FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 2282

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BEFORE THE
FEDERAL ELECTION COMMISSION

COMMON CAUSE 2030 M Street, N.W. Washington, D.C. 20036 (202) 833-1200, Complainant, v. NATIONAL REPUBLICAN SENATORIAL COMMITTEE, Respondent.	COMPLAINT

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92 OCT 29 P12:08

COMPLAINT OF COMMON CAUSE

1. This Complaint charges that the National Republican Senatorial Committee ("NRSC") has violated and is violating the Federal Election Campaign Act, 2 U.S.C. § 431, et seq., as amended ("FECA") by making contributions to Senatorial candidates in excess of its contribution limits.

PARTIES

2. Complainant Common Cause is a nonprofit membership corporation organized under the laws of the District of Columbia. It has approximately 264,000 dues-paying members in the 50 states and the District of Columbia. Common Cause promotes, on a nonpartisan basis, its members' interest in open, honest and effective government and political representation. Common Cause seeks

92 OCT 28 P8:00

to achieve this objective by making government more responsive to the needs and demands of citizens through government and election reform.

3. Respondent NRSC provides financial support to Republican Senatorial candidates. NRSC's chairman is Senator John Heinz (R-Pa.).

APPLICABLE STATUTES AND REGULATIONS

4. The FECA provides that the Republican or Democratic Senatorial Committee and the national committee of each political party respectively are subject to a combined contribution limit of $17,500 for each Senate candidate during the year in which an election is held. 2 U.S.C. § 441a(h).

5. The FECA limits contributions by any individual to a candidate for federal office, or to such candidate's authorized political committee, to $1,000 per election. 2 U.S.C. § 441a(a)(1)(A); accord 11 C.F.R. § 110.1(a)(1).

6. Section 110.6(d)(1) of the Federal Election Commission ("Commission") regulations provides that if a person or entity acts as a conduit for the earmarked contribution of another person, then the conduit's contribution limits are "affected" by passing on earmarked contributions "where the conduit exercises any direction or control over the choice of the recipient candidate." 11 C.F.R. § 110.6(d)(1). The Commission's

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Campaign Guide restates this provision as follows: "If the conduit exercises direction and control over the contribution, the earmarked contribution must also be attributed to the contribution limitations of the conduit." Campaign Guide for Congressional Candidates and Committees at 28 (1985).

GROUNDS FOR COMPLAINT

Facts

7. NRSC has engaged in a massive violation of the FECA restrictions on the amounts it may contribute to Republican Senatorial candidates. It used direct mail to solicit contributions, received millions of dollars in checks made out to NRSC, deposited those checks, and then sent its own checks to Republican Senatorial candidates it chose. The candidates who have received the most money are among those involved in the closest Senatorial elections.

8. According to a Washington Post report dated October 20, 1986, NRSC sent a mail solicitation to certain potential contributors under the letterhead "Office of the Vice President" stating that "'[o]ur Republican Senate candidates in Colorado, Alabama, Florida, and Missouri are on the verge of running out of money,'" but without identifying the candidates by name. The article stated that NRSC sent other solicitees different versions of the same letter discussing additional senatorial

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races. According to the article, the NRSC's appeal announced: "'If you'll write out your $100 check directly to the NRSC, they'll see to it that every penny of your generous contribution is evenly split and immediately delivered to each of these four candidates.'" (See attachment #1.)

9. On information and belief, in response to these solicitations, contributors sent checks to NRSC that designated NRSC as the payee. The contributors did not name any Republican Senatorial candidates or direct NRSC to forward all or any portion of the money to any such candidates.

10. On information and belief, when NRSC received these checks, it deposited them in its own account(s).

11. NRSC reported these contributions as having been earmarked by the contributors for certain specific candidates, even though it appears that all or even many contributors had not taken action to earmark them in this way. An article appearing in the Atlanta Constitution dated October 22, 1986 states that several of the individuals whose contributions to NRSC were listed in NRSC's campaign finance report as earmarked for particular candidates denied having earmarked their checks. For example, E.W. Dixon, whom NRSC listed as having contributed to the Denton, Mattingly, Abdnor, and Hutchinson campaigns, "said he was surprised that his . . . contribution to the NRSC was listed as earmarked," and noted that "'I don't know Mattingly from

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Adam's old fox.'" Mrs. Katherine Eberhard of Grand Rapids, Michigan, whom NRSC listed as giving $90 to candidate Henson Moore of Louisiana, echoed this sentiment:

> "'I wouldn't send to any person -- never -- unless I knew them . . . I live in Michigan . . . No way I would have sent money to Louisiana to Senator Moore or whoever he is.'"

(See attachment #2.)

12. Reports filed by the NRSC for the period January 1, 1985 through September 30, 1986 disclose that, as of September 30, 1986, 31 of the 34 Republican Sentorial candidates had received from NRSC $15,000 or more of the $17,500 NRSC was allowed to contribute to them under 2 U.S.C. § 441a(h).

13. The NRSC's October 15, 1986 quarterly campaign finance report (July 1 - September 30, 1986) also discloses that NRSC made approximately $3.5 million in additional contributions to Republican Senatorial candidates during this period, beyond those referred to in paragraph 12. (This $3.5 million figure does not include so-called "bundled" contributions where NRSC forwarded checks from individuals made out directly to the candidates.) According to NRSC's campaign finance report for this period, for example, NRSC gave Republican Senate candidates in Alabama (Senator Denton), Colorado (Mr. Kramer), Florida (Senator Hawkins), and Missouri (Mr. Bond) contributions of this kind

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totaling $388,445, $401,005, $295,105, and $158,915, respectively during the July 1, 1986 - September 30, 1986 period. NRSC's total contributions of this kind during the election cycle from January 1, 1985 through September 30, 1986 was $4,005,862. (See attachment #3 for the NRSC contributions of this kind to each Republican Senatorial candidate during this election cycle.)

Violations

14. In making the contributions discussed in paragraph 13, NRSC disbursed its own money and was not acting as a conduit for individual earmarked contributions. The contributions were not, in fact, earmarked; the checks were made out to NRSC; and NRSC deposited those checks in its own account(s) before making any disbursements. NRSC's disbursements were, therefore, FECA "contributions" by NRSC to those candidates. When those contributions exceeded the $17,500 limit, NRSC violated 2 U.S.C. § 441a(h) in each instance.

15. Even if NRSC is not viewed as having contributed its own funds but as having acted as a conduit for earmarked contributions of others, NRSC's actions still violated 2 U.S.C. § 441a(h). The Commission's regulations have made clear that a conduit's contribution limits would be "affected" by passing on earmarked contributions "where the conduit exercises any direction or control over the choice of the recipient candidate."

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"Direction" and "control" are independent criteria; there is no need to demonstrate "control" as long as the intermediary exercises "direction" over the choice of the recipient. 11 C.F.R. § 110.6(d)(1).

16. In this solicitation, NRSC has exercised both direction and control over the choice of recipient of the contributors' funds. Unlike the situations in advisory opinions in which the Commission has declined to attribute "bundled" contributions to an intermediary, see, e.g., AO 1980-46 (NCPAC), the individuals' contribution checks here were made out to NRSC, not to the candidate; and NRSC itself wrote out its own checks to the candidates. Once NRSC received the individuals' checks, the power to direct the funds to Senatorial candidates rested exclusively with NRSC. NRSC determined when, to whom, and in what amount the contributions would be directed to the candidates. As noted above, at least some contributors were unaware of (and surprised about) which candidates received the money they gave to NRSC.

17. In these circumstances, NRSC's transfers to the candidates are "contributions" to those candidates and should be attributed to NRSC's contribution limits. See AO 1986-4 (Armstrong World Industries); In re AOR 1976-92 (Boeing Civic Pledge Program). Since NRSC's total contributions to Republican Senatorial candidates, including those discussed above, exceeded

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its $17,500 contribution limit per candidate under § 441a(h), NRSC violated the FECA in each instance.

18. In addition, NRSC's overall scheme indicates its "direction" of the contributions in question. NRSC designed its solicitation letters and mailed them in ways to raise the maximum amount of money for use in races that are among the closest elections. Examination of NRSC's strategy and procedure should disclose that it is not mere happenstance that NRSC directed so much money to Republican candidates who were in the closest, not the easiest, Senatorial races. (See attachment #4.)

19. NRSC's actions here -- soliciting and receiving contributions for use in making contributions to candidates -- is akin to the traditional activity engaged in by PACs. The FECA does not permit a political committee to circumvent its contribution limits merely by announcing to solicitees its plans to make contributions to certain candidates and its intention to split contributions received from solicitees equally among candidates unless instructed to do otherwise. Indeed, if such a practice were permissible, all PACs could avoid their contribution limits by engaging in such a charade and the FECA's contribution limits would be meaningless.

20. Moreover, if NRSC is viewed as having acted as a conduit which directed and controlled the contributions, NRSC's program may be facilitating or encouraging widespread violations

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of the $1,000 contribution limit for individuals. As the Atlanta Constitution article demonstrates, at least some of the individuals in question were unaware that NRSC had charged them with making contributions to particular candidates. Conceivably, these individuals could already have made, or might later make, the maximum allowable contributions directly to the same candidates. NRSC, in its solicitation, apparently did not attempt to prevent such violations of the FECA from occurring.

RELIEF

21. Common Cause respectfully urges the Commission to conduct a prompt and thorough investigation into the allegations in this Complaint and declare that the NRSC has violated the FECA and Commission regulations.

Respectfully submitted,

Adrienne Masters

Roger M. Witten
Adrienne Masters

Wilmer, Cutler & Pickering
2445 M Street, N.W.
Washington, D.C. 20037-1420
(202) 663-6000

Counsel for Common Cause

Of Counsel:

Marcy Frosh*
Common Cause
2030 M Street, N.W.
Washington, D.C. 20036

*Not Admitted to the Bar

October 28, 1986

2040734420

VERIFICATION

The undersigned counsel for complainant Common Cause swears that the statements in this complaint are based on the sources indicated, and, as such, are true and correct to the best of her information and belief.

Adrienne Masters
Adrienne Masters

District of Columbia) ss
Subscribed and sworn before me this 28th day of October, 1986.

Gwendolyn D. Woodard
Notary Public

My Commission Expires: 9-30-90

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WASHINGTON POST, October 20, 1986

Campaign Skirts Rules by 'Bundling' Contributions

By Thomas B. Edsall
Washington Post Staff Writer

The National Republican Senatorial Committee (NRSC) last week filed a 59,000-page quarterly report that sets a record for length and establishes a new standard for political parties seeking to skirt federal campaign laws restricting contributions.

The committee, which has "maxed out" by giving the highest amounts allowed under law to key Senate candidates, channeled an additional $6 million to GOP candidates using controversial "bundling" techniques.

"This is completely within the limits of the law," said David Narsavage, spokesman for the NRSC. The special program was "designed to give our contributors complete flexibility," he said, contending that there was no intent to evade legal limits on the amount the committee can give to individual Senate candidates.

Fred Wertheimer, president of Common Cause, countered: "What's going on here is ludicrous. This is a direct evasion of the limits that are in federal campaign law."

Federal campaign law limits the amounts political parties can give to Senate candidates under a formula keyed to population. In New York, the parties can give each candidate about $1 million, while in small states, the maximum is $104,000. A central purpose of these restrictions is to keep campaign spending down.

The NRSC, however, raises far more money than it can give to candidates, and it has devised a growing array of techniques to channel additional cash to its favored candidates.

The Federal Election Commission (FEC), for example, has permitted to NRSC to "bundle" contributions to candidates: Loyal contributors were persuaded to send the NRSC checks made out to specific candidates, which the committee then passed on to the candidates.

This ruling was protested by Democrats and Common Cause. "The purpose of bundling is transparent. It is to avoid [legal] contribution limits," Common Cause wrote in seeking revised FEC regulations. The group pointed out that in 1984, the NRSC transferred well over $200,000 to each of three Senate candidates.

This year, the GOP Senate committee has taken the bundling process a step further. Narsavage refused to provide copies of the new program's solicitations, but other sources supplied a sample of a mailing under the letterhead "Office of the Vice President," in which Vice President Bush tells the reader:

"Our Republican Senate candidates in Colorado, Alabama, Florida, and Missouri are on the verge of running out of money . . . . A shift of just four seats will give control back to the Democrats . . . . If each of these four candidates don't raise at least $236,500 in the next 21 days—they'll lose . . . . Your action—or inaction—now will quite literally mean political life or death for each of these candidates."

The candidates in these states are not named, and the states are changed in different versions so that all the tight contests are covered.

Readers are not asked to write checks to the individual candidates, as is the normal "bundling" practice, but instead they are told: "If you'll write out your $100 check directly to the NRSC, they'll see to it that every penny of your generous contribution is evenly split and immediately delivered to each of these four candidates."

The letter appeared to conflict with an assertion by Narsavage that contributors "are not directed" to give to specific campaigns. He said that the GOP committee provides a list of important races and provides options allowing the contributors to "give money to some or all or none" of the campaigns. "We would be in violation of the law" if specific direction were given, he said.

Attachment #1

Attachment #2

ATLANTA CONSTITUTION

October 22, 1986

Republican group's gifts to Mattingly not listed

Senator's finance report didn't include donations

By Andrew Mollison
Journal-Constitution Washington Bureau

WASHINGTON — Sen. Mack Mattingly's latest campaign finance report fails to list hundreds of small contributions that were raised for him by the National Republican Senatorial Committee from July through September.

The donors' names appear scattered among thousands of others in a 59,000-page report filed last week by the NRSC. The document, the biggest in the history of campaign reporting laws, lists contributions that the NRSC claims were earmarked for Mattingly or other GOP Senate candidates by the donors.

Several other Republican senators added the NRSC donor list to their most recent finance report, but Mattingly did not. The omission makes it harder to determine how much money he received from people who live outside Georgia.

A spokesman for the Federal Election Commission, while declining any comment on Mattingly's case, said that federal law requires Senate candidates to report the source of every dollar received from or through any committee for his re-election campaign.

"If it's an earmarked contribution, the identity of the person must be given no matter what the amount," said Fred Eiland of the FEC.

In reporting larger contributions raised by the NRSC, Mattingly's campaign did list individual givers but failed to disclose that those contributions were funneled through the NRSC.

Mattingly campaign spokesman Richard Moore said that in earlier reports the campaign filed even more information than it had to. He said the "huge volume" of contributions received by Mattingly between July 24 and Sept. 30 accounted for the failure to do so this time.

"Whatever information that would be required that was not included in the last report will be done in an amended report," Moore said. He said he didn't know how much Mattingly received from the NRSC in earmarked funds.

The NRSC legally can spend no more than $376,700 on Mattingly's behalf and directly give him only $17,500. But it also can serve as a "conduit" for funds from individuals who earmark their contributions for a particular candidate. That doesn't count against the committee's limits.

Telephone interviews with some of the contributors listed on the early pages of the NRSC report raised the question of whether the funds really were earmarked for particular candidates.

"I don't know Mattingly from Adam's old fox," said E.W. Dixon of Tulsa, Okla., who was listed in the NRSC report as a contributor to Mattingly's campaign.

Dixon said he was surprised that his $120 contribution to the NRSC was listed as earmarked for $30 each to Sens. Mattingly, Jeremiah A. Denton of Alabama and James Abdnor of South Dakota and Republican challenger Asa Hutchinson of Arkansas.

Charles S. Pope of San Francisco denied that he had earmarked his $440 check to be split evenly between the same four Republicans, although it was listed that way in the NRSC report.

"I wouldn't send to any person — never — unless I knew them," said Katherine Eberhard of Grand Rapids, Mich., who was listed as giving $90 to Republican Senate candidate Hensen Moore in Louisiana.

"I live in Michigan," she said. "No way I would have sent money to Louisiana to Senator Moore or whoever he is."

The NRSC says it sent out a series of fund-raising letters, over the names of such prominent Republicans as Vice President George Bush, which promised that any money raised through the letter would be split among specified candidates.

"I never read anything like that," Mrs. Eberhard said.

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Attachment #3

NRSC CONTRIBUTIONS TO CURRENT REPUBLICAN SENATE CANDIDATES
LISTED BY NRSC AS "EARMARKED" CONTRIBUTIONS

January 1, 1985 - September 30, 1986

Candidate	NRSC Contributions
James Abdnor (SD)	$644,125
James Santini (NV)	462,479
Ken Kramer (CO)	401,005
Jeremiah Denton (AL)	388,445
Henson Moore (LA)	319,108
Paula Hawkins (FL)	295,105
Richard Snelling (VT)	294,878
Asa Hutchinson (AR)	219,766
Ed Zschau (CA)	212,457
James Broyhill (NC)	170,473
Mack Mattingly (GA)	166,965
Christopher Bond (MO)	158,915
Steve Symms (ID)	46,331
Mark Andrews (ND)	45,814
Henry McMaster (SC)	38,406
John McCain (AZ)	20,180
Don Nickles (OK)	19,147
Robert Dole (KS)	16,030
Robert Kasten (WI)	14,233
Alfonse D'Amato (NY)	10,210
Judy Koehler (IL)	10,100
Arlen Specter (PA)	8,495
Slade Gorton (WA)	7,155
Thomas Kindness (OH)	6,816
Dan Quayle (IN)	4,675
Frank Murkowski (AK)	4,635
Charles Grassley (IA)	4,335
Warren Rudman (NH)	4,015
Linda Chavez (MD)	3,900
Robert Packwood (OR)	3,620
Roger Eddy (CT)	1,784
Jake Garn (UT)	1,150
Jackson Andrews (KY)	1,110
Total:	$4,005,862

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Attachment #4

THE WALL STREET JOURNAL

October 24, 1986

GOP Panel's Bypass of Federal Aid Cap Totals $6.6 Million for Senatorial Races

By Brooks Jackson
Staff Reporter of The Wall Street Journal

A new tally shows the National Republican Senatorial Committee has quietly funneled nearly $6.6 million extra into the coffers of GOP Senate candidates, using a technique that effectively nullifies federal limits on financial aid parties may provide.

The tabulation by The Wall Street Journal shows the GOP group is directing most of the extra money to relatively small states with tight races, where it could possibly prove decisive and help the party retain its narrow Senate majority. The states include Nevada, Alabama, Colorado and Vermont. In South Dakota, the senatorial committee's additional aid amounts to $1.85 for every person of voting age.

The money is in addition to the $12 million that federal law allows parties to spend for their Senate candidates this year. Financially strapped Democrats say they'll only manage about half that. Republicans, getting around the limits, may effectively give double that amount. One GOP fund-raiser said yesterday the GOP senatorial committee expects the $6.6 million, the total given through Sept. 30, to grow to perhaps $13 million or more by Election Day.

The National Republican Senatorial Committee's executive director, Tom Griscom, wouldn't comment on the Journal's tabulation or say how high the total might go by Election Day.

The unprecedented size of the committee's limit-skirting operation, and the efficient way in which the party has been able to control the destination of the extra money, is shown by this newspaper's tabulation of thousands of transactions reported by the GOP senatorial committee to the Federal Election Commission. The committee has refused to provide totals.

The technique used to get around the party limits is called "bundling" or, in legal language, earmarking. The committee asks its donors to designate their gifts for specific candidates rather than for the unrestricted use of the party, then passes on the donations. The committee says this is permitted by current regulations of the Federal Election Commission.

However, the GOP senatorial committee's operation goes far beyond anything seen previously. The self-styled citizens lobby Common Cause said it will file an official complaint about it.

Common Cause president Fred Wertheimer said the committee's actions "constitute a blatant violation of the party contribution limits in the law. . . . This is a classic example of the kind of flagrant abuse that can occur when people conclude they don't have to worry about the laws being enforced."

The bundling operation is giving the GOP enormous leverage in smaller states, where federal limits (which are based on population) are low and where television and radio advertisements are much cheaper than in giants like California and New York. For example, the senatorial committee has reported passing on $931,554 to the campaign of Sen. James Abdnor in South Dakota, which is nine times more than the federal limit on financial aid the party

Big Bundle

Contributions funneled to Republican Senate candidates by National Republican Senatorial Committee through "bundling"

Abdnor (S.D.)	$ 931,554
Santini (Nev.)	738,504
Denton (Ala.)	556,768
Hawkins (Fla.)	524,029
Kramer (Colo.)	508,910
Moore (La.)	492,700
Snelling (Vt.)	453,818
Zschau (Calif.)	414,436
Bond (Mo.)	310,850
Hutchinson (Ark.)	256,816
TOTAL (all candidates)	$6,599,855

Note: Partial listing

Source: WSJ tabulation

GOP candidates are also the primary beneficiaries of an unprecedented bout of independent spending by political-action committees run by major lobbying groups. For example, a PAC committee called Auto Dealers and Drivers for Free Trade, which is financed by U.S. dealers of Japanese automobiles, just reported buying $400,000 in advertising for GOP Sen. Paula Hawkins of Florida. It is one of the biggest single independent campaigns ever undertaken by a trade group, and the first one ever by the Japanese car dealers' PAC.

In Colorado, the National Association of Realtors reported pouring $323,000 into radio, television and print advertising on behalf of GOP Rep. Ken Kramer, who is in a nip-and-tuck battle with Democratic Rep. Timothy Wirth for an open Senate seat. The PAC also reported spending $243,092 in North Carolina for a targeted campaign of television and print advertising for GOP Sen. James Broyhill. Both the Colorado and North Carolina races are close, and the Realtors are hoping their shadow campaigns will prove decisive.

PAC giving isn't only to Republicans, of course. The biggest independent PAC effort this year is on behalf of a conservative Democrat, Rep. James Jones of Oklahoma. Realtors are spending an estimated $450,000 to back his uphill bid against GOP Sen. Don Nickles.

Also, a tally released yesterday by Common Cause shows PACs gave $15.4 million to Democratic Senate candidates and $18.6 million to Republicans in the 21 months ended Sept. 30. The total given to both sides was 62% higher than for the similar period in the 1984 Senate elections, Common Cause said. That counts only direct donations; a PAC may give only $5,000 per election directly to any one candidate.

Independent spending by PACs, which escapes these limits, is growing even more explosively. New wads of money are showing up almost every day as PACs file new reports. The American Medical Association just reported spending $72,436 to buy broadcast advertising time to support GOP Sen. Robert Kasten in Wisconsin.

SENSITIVE

FEDERAL ELECTION COMMISSION
999 E Street, N.W.
Washington, D.C. 20463

EXPEDITED FIRST GENERAL COUNSEL'S REPORT

97 OCT 30 P3:33

RESPONDENTS: National Republican Senatorial Committee, and Rodney A. Smith, Treasurer

MUR: 2282
DATE TRANSMITTED TO COMMISSION:

STAFF: George F. Rishel

COMPLAINANT: Common Cause

SUMMARY OF ALLEGATIONS

The Complainant alleges that the Respondent violated 2 U.S.C. § 441a(h) and 11 C.F.R. § 110.6 by making contributions to Senatorial candidates in excess of its contribution limits in that the Respondent has (1) solicited and received contributions made out to it as payee and then sent its own checks to Senatorial candidates; (2) erroneously reported contributions as earmarked by the contributors; and (3) passed on contributions where it had exercised direction and control with respect to the choice of the recipient candidate.

PRELIMINARY LEGAL ANALYSIS

The Office of General Counsel's initial review of the complaint indicates that violations of 2 U.S.C. §§ 441a(a)(8) and 441a(h) and 11 C.F.R. §§ 110.2(c) and 110.6 may have occurred by the Respondent's alleged contribution of its own funds to Senatorial candidates in excess of the limits and/or by its alleged passing on earmarked contributions over which the Respondent exercised direction and control over the choice of the recipient candidate. Therefore, because it is not immediately clear whether such contributions in excess of the Act's

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limitations have occurred, the Respondent must be given the opportunity to respond to the allegations before the Office of General Counsel can make recommendations regarding this matter.

Charles N. Steele
General Counsel

10/30/86
Date

BY: Lawrence M. Noble
Lawrence M. Noble
Deputy General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 31, 1986

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Rodney A. Smith, Treasurer
National Republican Senatorial Committee
440 First Street, NW
Suite 600
Washington, DC 20001

RE: MUR 2282

Dear Mr. Smith:

This letter is to notify you that on October 28, 1986, the Federal Election Commission received a complaint which alleges that the National Republican Senatorial Committee and you, as treasurer, have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 2282. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you and the National Republican Senatorial Committee in connection with this matter. You may respond to the allegations within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory period, the Commission may take further action based on available information.

You are encouraged to respond to this notification promptly. In order to facilitate an expeditious response to this notification, we have enclosed a pre-addressed, postage paid, special delivery envelope.

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

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

If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notification and other communications from the Commission.

If you have any questions, please contact George Rishel, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Charles N. Steele
General Counsel

By: Lawrence M. Noble
Deputy General Counsel

Enclosures
Complaint
Procedures
Envelope

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FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

October 31, 1986

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Adrienne Masters
Wilmer, Cutler & Pickering
2445 M Street, NW
Washington, DC 20037

RE: MUR 2282

Dear Ms. Masters:

This letter is to acknowledge receipt of your complaint on October 28, 1986, against the National Republican Senatorial Committee and Mr. Rodney A. Smith, as treasurer, which alleges violations of the Federal Election Campaign laws. A staff member has been assigned to analyze your allegations. The respondents will be notified of this complaint within 24 hours. You will be notified as soon as the Commission takes final action on your complaint. Should you have or receive any additional information in this matter, please forward it to this office. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Please be advised that this matter shall remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless the respondents notify the Commission in writing that they wish the matter to be made public.

Sincerely,

Charles N. Steele
General Counsel

By: Lawrence M. Noble
Deputy General Counsel

Enclosure

cc: Marcy Frosh
Common Cause

2273470

GCC#1972

EPSTEIN BECKER BORSODY & GREEN, P.C.
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703 684 1204

201 MAIN STREET
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(817) 334-0701

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515 EAST PARK AVENUE
TALLAHASSEE, FLORIDA 32301-2524
(904) 681-0596

*P.C. NEW YORK, WASHINGTON, D.C. AND VIRGINIA ONLY

RECEIVED
FEDERAL ELECTION
GENERAL COUNSEL
86 NOV 10 P 2:55

November 10, 1986

HAND DELIVERED

George F. Rishel, Esquire
Office of the General Counsel
Federal Election Commission
999 E Street, N.W.
Room 657
Washington, D.C. 20463

RE: MUR 2282: Respondent, National Republican Senatorial Committee

Dear George:

As discussed, enclosed please find a Statement of Designation of Counsel in the above-captioned matter. In addition, enclosed is a formal request for a twenty-day extension of time in which to respond to the complaint.

As always, please do not hesitate to contact this office if you have any questions regarding this matter.

Very truly yours,

Leslie J. Kerman

LJK/mbe
Enclosure

2040732431

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November 10, 1986

HAND DELIVERED

George F. Rishel, Esquire
Office of the General Counsel
Federal Election Commission
999 E Street, N.W.
Room 657
Washington, D.C. 20463

RE: MUR 2282: Respondent, National Republican Senatorial Committee

Dear Mr. Rishel:

On behalf of the National Republican Senatorial Committee ("NRSC" or "the Respondent"), we hereby request a twenty (20) day extension of time in which to respond to the allegations made by Common Cause in the above-captioned complaint.

Respondent's response currently is due to be filed with your office on or before November 20, 1986. Due to the extensive factual and legal analysis required to fully respond to Common Cause's allegations, a twenty-day extension of time in which to file this response is necessary and appropriate. Therefore, we request that the due date for the NRSC's response in the above-captioned matter be extended by twenty days, until December 10, 1986.

Thank you for your assistance with this matter. If you have any questions regarding this request, please do not hesitate to contact this office.

Very truly yours,

Stuart M. Gerson

Stuart M. Gerson
General Counsel
National Republican Senatorial Committee

LJK/mbe

[redacted]

MUR 2282

[redacted]: Stuart M. Gerson, Esquire

[redacted]: Epstein Becker Borsody & Green, P.C.
1140 19th Street, N.W., Suite 900
Washington, D.C. 20036

[redacted]: (202) 861-0900

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

November 6, 1986
Date

Rodney B. Smith
Signature
Treasurer
National Republican Senatorial Committee

[redacted]'S NAME: National Republican Senatorial Committee

[redacted]: 440 First Street, N.W.
Suite 600
Washington, D.C. 20001

[redacted]: - - -

[redacted]: (202) 347-0202

2204073243 3

GCC 2002

BEFORE THE
FEDERAL ELECTION COMMISSION

COMMON CAUSE 2030 M Street, N.W. Washington, D.C. 20036 (202) 833-1200, Complainant, v. NATIONAL REPUBLICAN SENATORIAL COMMITTEE, Respondent.	)	MUR 2282

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FEDERAL ELECTION COMMISSION
GENERAL COUNSEL
'86 NOV 14 P12:29

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SUPPLEMENT TO COMPLAINT OF COMMON CAUSE

1. On October 28, 1986, Common Cause filed a complaint with the Federal Election Commission ("Commission") charging that the National Republican Senatorial Committee ("NRSC") had violated the Federal Election Campaign Act ("FECA") by making contributions to Republican Senatorial candidates in excess of NRSC's statutory limits. In its campaign finance report, NRSC had treated these contributions as earmarked by individual contributors for particular candidates, despite the fact that the contribution checks had been made out directly to NRSC, apparently because of the manner in which the contributions were solicited.

2. In its Complaint, Common Cause quoted from a newspaper article reporting that a number of individuals whose contributions to NRSC were listed in NRSC's campaign finance report as earmarked for particular candidates denied having earmarked their checks. In this Supplement, Common Cause seeks to bring to the attention of the Commission two other newspaper articles which also report that individuals alleged by NRSC to have earmarked their contributions deny that they have done so.

3. According to an article appearing in the Arkansas Gazette on October 19, 1986,[1/] random telephone interviews with ten individuals listed by NRSC as contributors to the Senatorial campaign of Asa Hutchinson (Arkansas) revealed that not one of the supposed contributors "knew Hutchinson by name." According to the article, "[a]ll 10 [of those interviewed] had similar responses: They said they had made contributions to the [NRSC] but couldn't recall that they specified their contributions go to a specific campaign -- Hutchinson's or anyone else's." For example, Claude Dale of Twin Bridges, Montana, informed a reporter:

> "'I always go through the national committee' when making political contributions. He said he thought the Republican Senatorial Committee then distributed his contribution 'as they judge it should be' distributed. 'I couldn't tell you who -- which candidate -- it went to.'"

1/ "Hutchinson Gets Contributions From at Least 10 Strangers," Arkansas Gazette (Oct. 19, 1986).

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Similarly, Ralph Hilbert of Houston, Texas, "thought he had made a 'general contribution' to the [NRSC] 'to use as they see fit.'" Ray Simpson, of Mount Airy, Maryland, whose wife Helen was listed as a contributor,

> "said he and his wife contributed to" NRSC, but when "[a]sked if he or his wife . . . designated that their contribution go to Hutchinson, Simpson told a reporter, 'No. Somebody gave you a bum steer.'"

According to the report, "[o]nly one of the 10 persons interviewed . . . said 'perhaps I did' specify that his contribution to the Committee be sent to Hutchinson."

4. A New York Times article appearing on October 29, 1986,[2/] reported similar reactions by others who, according to NRSC, had earmarked their contributions for specific candidates. David T. Hooper, of West Redding, Connecticut, who, according to NRSC, had contributed to the campaigns of Senator Denton (Alabama), Senator Hawkins (Florida), Christopher Bond (Missouri), and Kenneth Kramer (Colorado), told a reporter:

> "'Wait a minute, . . . I don't remember Bond and Kramer. Those names don't even ring a bell. I don't know where you're getting this information from. I made a contribution to the Republican senatorial committee and rely on them to use the money in the most effective way.'"

2/ "'Who?' Some Donors Hadn't Heard of Candidates," New York Times (Oct. 29, 1986).

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And when William F. Alcock, of Matamcras, Pennsylvania, was asked whether he had heard of James Santini (Nevada), he replied: "'Who? DeConcini?'"

5. Copies of these articles are attached hereto as Attachments 1 and 2 respectively.

Respectfully submitted,

Adrienne Masters

Roger M. Witten
Adrienne Masters

Wilmer, Cutler & Pickering
2445 M Street, N.W.
Washington, D.C. 20037-1420
(202) 663-6000

Counsel for Common Cause

Of Counsel:

Marcy Frosh*
Common Cause
2030 M Street, N.W.
Washington, D.C. 20036

*Not Admitted to the Bar

November 14, 1986

2204073437

VERIFICATION

The undersigned counsel for complainant Common Cause swears that the statements in this Supplement to the Complaint are based on the sources indicated, and, as such, are true and correct to the best of her information and belief.

Adrienne Masters

Adrienne Masters

District of Columbia)
) ss

Subscribed and sworn to before me this 12th day of November, 1986

Notary Public

My Commission Expires: 9-30-90

2204073241738

Attachment #1

ARKANSAS GAZETTE, October 19, 1986

Hutchinson gets contributions from at least 10 strangers

By Scott Van Laningham
GAZETTE STAFF

"Who's he?" Ralph Hilbert of Houston, Tex., said Friday when asked about Asa Hutchinson of Fort Smith, the Republican candidate for the United States Senate in Arkansas. A Houston resident wouldn't necessarily be expected to know Hutchinson, except that Hilbert is listed as a contributor to Hutchinson's campaign.

Hilbert was one of 10 Hutchinson contributors, all from outside Arkansas and selected at random, interviewed by telephone by a *Gazette* reporter Friday. None of the 10 knew Hutchinson by name.

The 10 were among about 9,000 people who made what are called "conduit contributions" to Hutchinson's campaign. The contributions were sent to the National Republican Senatorial Committee, which serves as the "conduit" and passes such contributions along to candidates in the states.

Jennifer Duffy, a Committee spokesman, said in a telephone interview Friday that "absolutely, definitely each individual [contributor] specifies" which candidate is to receive the contribution. She said the contributors usually name the candidate in a letter that accompanies the check or write the candidate's name on the check.

When told that all 10 of the persons reached by the *Gazette* Friday didn't know who Hutchinson was, Duffy said she found that "extremely difficult to believe."

Contributors notified

Duffy said the Committee has documentation to show each contributor specified his or her contribution was for Hutchinson. She added the Committee's accounting department sends a statement to the contributors verifying their contributions went to the candidate they specified and the Committee and the candidates each send "thank you" letters to the contributors.

"These people do know where their contributions went," she insisted.

But only one of the 10 persons interviewed Friday — Claude Mulholland of Zumbro Falls, Minn. — said "perhaps I did" specify that his contribution to the Committee be sent to Hutchinson.

All 10 had similar responses. They said they had made contributions to the Committee but couldn't recall that they specified their contributions go to a specific campaign — Hutchinson's or anyone else's.

Under federal law the conduit contributions must be made by individuals. There is no limit on the amount of conduit contributions a national organization can pass along to a senatorial race in a state.

In the campaign finance report

(See CAMPAIGN on Page 5A.)

75 per cent of people listed on report from out of state

Asa Hutchinson of Fort Smith, the Republican candidate for the United States Senate, said last week that his latest campaign finance report demonstrated that "we're getting solid grass roots support from across Arkansas." But a review of Hutchinson's campaign finances shows that, at best, half of his contributions from individuals came from out-of-state residents.

The campaign finance report of United States Senator Dale Bumpers, the Democrat Hutchinson is opposing in the November 4 general election, shows that out-of-state residents accounted for only 11.1 per cent of the itemized contributions Bumpers received from individuals.

The campaign finance reports cover contributions received between July 1 and September 30. The reports were filed last week with the Federal Election Commission and copies were available at the secretary of state's office.

Hutchinson said in a news release last week that his report demonstrated his campaign's "grass roots support."

But figures compiled by the *Gazette* show that 75.6 per cent of the itemized contributions Hutchinson received from individuals came from out-of-state residents, as determined by the addresses listed in the report.

Hutchinson also reported $131,867 in unitemized contribu-

(See REPORT on Page 5A.)

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Campaign

Continued from Page 1A

filed Wednesday with the Federal Election Commission, copies of which also are filed with the secre- [illegible] Hutchinson reported conduit contributions from the National Republican Senatorial Committee totaling $110,316.

Hutchinson is opposing United States Senator Dale Bumpers, a Democrat, in the November 4 general election. Bumpers reported no conduit contributions in his FEC report.

FEC officials told the *Gazette* earlier in the week that conduit contributions are legal, but a contributor is supposed to specify which candidate is to receive the contribution. FEC officials couldn't be reached Friday for comment. FEC offices and other federal offices were closed Friday afternoon because Congress hadn't taken action on federal funding legislation.

Federal law allows the national organizations of each political party to contribute directly a maximum of $17,500 each to the campaigns of their respective party candidates. Bumpers has received $17,500 from the Democratic Senatorial Campaign Committee, and Hutchinson has received the direct support money from the National Republican Senatorial Committee.

'Co-ordinated' contributions

But in addition to the $17,500 in direct contributions, and those conduit contributions, the national organizations also may contribute a maximum of $149,442 to the Arkansas senatorial candidates in what are called "co-ordinated" contributions. The co-ordinated contributions are limited through a per-state formula and may be used to buy advertising and direct mail or finance other campaign expenses.

A spokesman for the Bumpers campaign said yesterday that the senator hadn't received any co-ordinated contributions from the Democratic Senatorial Campaign Committee.

Hutchinson said in a telephone interview Friday that his campaign has received "some" co-ordinated contributions but he didn't know the amount. He said the National Republican Senatorial Committee writes the checks directly to the vendors, such as advertisers, and the Committee reports the expenditures to the FEC. The co-ordinated expenditures aren't listed in the candidates' campaign finance reports.

Asked about the conduit contributions, Hutchinson said, "It just means we're receiving money from across the country."

He said political action committees tend to support incumbents, such as Bumpers, and conduit contributions are a way for challengers to offset the incumbent's PAC money advantage. "He's got his sources, and we've got ours," Hutchinson said. He said he would "much rather get help from individuals" than from PACs.

When told that those reached by the *Gazette* couldn't recall specifying that their contributions were to go to his campaign, Hutchinson said his campaign has sent thank-you notes to the contributors. "These people are concerned about putting conservatives in the Senate."

> "I don't recall. But I don't think I designated any particular one [candidate]."
>
> — Contributor

Although they didn't know Hutchinson, the 10 persons interviewed did indicate support for conservative candidates. Each person also contributed only small amounts, ranging from $2.50 to $12.50.

"I don't know him," Mulholland said. "Perhaps I did [specify Hutchinson]. I get so many requests. I just like to help Republican candidates when I can."

Hilbert, when asked about his contribution to the Arkansas GOP senatorial candidate, said, "I don't know anything about state politics in Arkansas."

When told that his contribution to the Republican Senatorial Committee has been channeled to Asa Hutchinson, Hilbert asked, "Who's he?" When told Hutchinson was a Republican candidate for the United States Senate, Hilbert said, "The name's familiar."

But Hilbert also said he thought he had made a "general contribution" to the National Republican Senatorial Committee "to use as they see fit." He added, "Basically, I'm a Democrat. But I'd like to see the president retain the leadership and see the Senate support President Reagan."

Vernon Gunvalson of Bemidji, Minn., another of the 10 interviewed, said he made a "general contribution" to the Republican Senatorial Committee. But the contribution was "not on his behalf," referring to Hutchinson.

Charles Hill of Spokane, Wash., said he wanted the Republicans "to get a little more strength" in Congress. He said he didn't know Hutchinson but did recall "some list of people" the Republican Senatorial Committee had "targeted" for funds. "I don't recall. But I don't think I designated any particular one [candidate]."

Claude Dale of Twin Bridges, Mont., said, "I always go through the national committee" when making political contributions. He said he thought the Republican Senatorial Committee then distributes his contribution "as they judge it should be" distributed. "I couldn't tell you who — which candidate — it went to."

Charles Hanner of Melbourne, Fla., said he belongs to the National Republican Senatorial Committee. "No, I never heard of him," he said when asked about his contribution to Hutchinson. "I just sent the contribution in, unless I overlooked something. I just help where I can."

Eloise Mazanyi of Long Lake, Minn., said she gave to the Republican Senatorial Committee but added, "No, I didn't express a preference" about which candidate received the contribution.

"I don't even know him," Pat Flenniken of Jerome, Ida., said when asked about her contribution to Hutchinson. "No, I wasn't aware it went to him," she added.

Hal Wiltermood of Oakland, Cal., said he contributed to the Republican Senatorial Committee. But when asked about designating the contribution for Hutchinson, Wiltermood said, "No. No. Not at all."

Ray Simpson of Mount Airy, Md., whose wife, Helen, was listed as a contributor, said he and his wife contributed to the Republican Senatorial Committee. Asked if he or his wife, who was unavailable for comment, designated that their contribution go to Hutchinson, Simpson told a reporter, "No. Somebody gave you a bum steer."

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Report

Continued from Page 1A

tions from individuals. Unitemized contributions from individuals are contributions of $200 or less, and the contributors aren't listed in finance reports, as are persons who contribute $201 or more.

Hutchinson said in a telephone interview late last week that his unitemized contributions from individuals came almost entirely from state residents. That would mean that Arkansas residents accounted for 50.4 per cent of the contributions Hutchinson received from individuals.

Hutchinson reported that his campaign received contributions totaling $425,875, of which $131,867 were unitemized contributions from individuals and $251,892 were itemized contributions from individuals. He reported contributions from political party committees and political action committees of $41,115.

Of Hutchinson's $251,892 in itemized contributions from individuals, the report shows that $61,570 (24.4 per cent) came from individuals with Arkansas addresses. The remaining $190,322 (75.6 per cent) came from contributors with out-of-state addresses.

The $190,322 includes $110,316 that Hutchinson received in so-called "conduit contributions" — contributions by individuals to the National Republican Senatorial Campaign Committee, which served as the "conduit" and passed the contributions on.

Bumpers reported total contributions of $432,551, of which $49,658 were unitemized contributions from individuals and $238,913 were itemized contributions from individuals. He reported contributions from political party committees and political action committees of $143,980.

Of Bumpers' $238,913 in itemized contributions from individuals, the report shows that $212,306 (88.8 per cent) came from individuals with Arkansas addresses and $26,607 (11.2 per cent) came from individuals with out-of-state addresses. Bumpers reported no conduit contributions.

If all of Bumpers' unitemized contributions from individuals also came from in-state residents, then Arkansans accounted for 90.7 per cent of Bumpers' contributions from individuals.

Hutchinson was asked last week about the percentage of out-of-state contributions to his campaign. He said the conduit contributions allowed challengers to match the funds political action committees traditionally donate to incumbents.

He added that the almost $200,000 his campaign had raised from Arkansas residents "shows good grass roots support when you're going up against a 12-year incumbent."

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NEW YORK TIMES, October 29, 1986

'Who?' Some Donors Hadn't Heard of Candidates

By RICHARD L. BERKE
Special to The New York Times

WASHINGTON, Oct. 28 — William F. Alcock is listed in a Federal campaign report as contributing $10 this year to the Senate campaign of James Santini, Republican of Nevada.

But Mr. Alcock, a retired communications manager in Matamoras, Pa., said he had never heard of a James Santini.

"Who? DeConcini?" he asked, confusing Mr. Santini, a Congressman from Nevada, with Senator Dennis DeConcini, Democrat of Arizona.

In random telephone interviews around the country this week, Mr. Alcott and several other contributors said they had no idea that the checks they sent to the National Republican Senatorial Committee had been earmarked for particular candidates.

The committee has exceeded Federal limits, apparently without breaking the law, on the amount it can contribute to individuals by asserting that the contributors designated money for specific candidates, and not for unrestricted spending by the committee.

Through this practice of "bundling" the committee has channeled about $1 million this year to Senate candidates, mostly in close races in smaller states, according to the committee's latest report to the Federal Election Commission. The reports show that the money has been collected from relatively small contributions solicited largely through direct mail.

In a letter dated Sept. 2 and signed by Vice President Bush, contributors were urged to donate to candidates in specific states, although names were not cited. Many loyal Republican donors responded swiftly to solicitations from Mr. Bush and others, and, as requested, wrote checks made out to the senatorial committee.

David T. Hooper, retired, of West Redding, Conn., is listed as contributing $5 to each of these Republican candidates for Senate: Senator Jeremiah Denton of Alabama, Senator Paula Hawkins of Florida, Christopher Bond of Missouri and Kenneth Kramer of Colorado.

"Wait a minute," said Mr. Hooper. "I don't remember Bond and Kramer. Those names don't even ring a bell. I don't know where you're getting this information from. I made a contribution to the Republican senatorial committee and rely on them to use the money in the most effective way."

David Narsavage, a spokesman for the senatorial committee, said the committee sent confirmation notices to donors and "thank you" notes from the designated candidates for their contributions. He contended that the committee did make it clear to the donors, both in the solicitations and follow-up letters, where their money was going.

Attachment #2

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

November 17, 1986

Stuart M. Gerson, Esquire
Epstein, Becker, Borsody & Green, P.C.
1140 Nineteenth Street, N.W.
Washington, D.C. 20036

RE: MUR 2282
National Republican Senatorial Committee;
Rodney A. Smith, as treasurer

Dear Mr. Gerson:

This is in response to your letter dated November 10, 1986, in which you request a twenty-day extension of time to respond to the allegations against your clients, the National Republican Senatorial Committee and Rodney A. Smith, as treasurer.

I have reviewed your request and agree to the requested extension. Accordingly, your response is due no later than December 10, 1986. If you have any questions, please contact George Rishel at (202) 376-5690.

Sincerely,

Charles N. Steele
General Counsel

By: Lois Lerner
Associate General Counsel

2207320443

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 20, 1986

Ms. Adrienne Masters
Wilmer, Cutler & Pickering
2445 M Street, N.W.
Washington, D.C. 20037

RE: MUR 2282

Dear Ms. Masters:

This letter acknowledges receipt of the supplemental information you provided which the Commission received on November 14, 1986. The respondents will be sent a copy of this supplemental information.

You will be notified as soon as the Commission takes final action on your complaint. Should you receive additional information in this matter, please forward it to this Office. We suggest that such information be sworn to in the same manner as the original complaint. If you have any questions, please contact Retha L. Dixon, docket chief, at (202) 376-3110.

Sincerely,

Charles N. Steele
General Counsel

By: Lois G. Lerner
Associate General Counsel

cc: Marcy Frosh
Common Cause

2204073244

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 20, 1986

Stuart M. Gerson, Esquire
Epstein Becker Borsody & Green, P.C.
1140 Nineteenth Street, N.W.
Washington, D.C. 20036

RE: MUR 2282
National Republican Senatorial Committee; Rodney A. Smith, as treasurer

Dear Mr. Gerson:

On October 31, 1986, the Federal Election Commission notified your clients of a complaint alleging that your clients may have violated sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). On November 14, 1986, this Office received a supplement to this complaint which is enclosed for your information.

If you have any questions, please contact George Rishel, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Charles N. Steele
General Counsel

By: Lois G. Lerner
Associate General Counsel

Enclosure
Supplement to Complaint

2207324345

GC#2283

EPSTEIN BECKER BORSODY & GREEN, P.C.

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December 15, 1986

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT
'86 DEC 16 P3:08

HAND DELIVERED

George F. Rishel, Esquire
Office of the General Counsel
Federal Election Commission
999 E Street, N.W.
Room 657
Washington, D.C. 20463

RE: MUR 2282: Respondent, National Republican Senatorial Committee

Dear George:

Enclosed please find response of the National Republican Senatorial Committee in the above-captioned matter.

As always, please do not hesitate to contact this office if you have any questions regarding this matter.

Very truly yours,

Leslie J. Kerman

Leslie J. Kerman

LJK:kb

Enclosure

2007324346

CCC# 2284

EPSTEIN BECKER BORSODY & GREEN, P.C.
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*P.C. NEW YORK, WASHINGTON, D.C. AND VIRGINIA ONLY

December 15, 1986

Charles N. Steele, Esquire
General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 2282

Dear Mr. Steele:

This letter and its attachments, including the affidavit of Ms. Maryanne E. Preztunik and related materials, are submitted on behalf of the National Republican Senatorial Committee ("NRSC") in response to a complaint filed on October 28, 1986, and supplemented on November 14, 1986, by the interest group Common Cause and designated as Matter Under Review ("MUR") 2282.

The complaint, which is based upon erroneous interpretations of both fact and law, concerns the NRSC's role as conduit for certain earmarked contributions to specific campaigns for the United States Senate in 1986.1/ These donor-directed

1/ The complaint is essentially based on newspaper reports and editorial opinions which in turn quote largely anecdotal sources. The Federal Election Commission historically has declined to proceed on such bases and, given the evidence of thorough compliance with applicable law and precedents by the NRSC, the Commission should find no reason to believe that a

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contributions were encouraged by the NRSC through a direct-mail solicitation on the letterhead of the Office of the Vice President of the United States. This mailing, which occurred on or about September 2, 1986, is the specific subject of Common Cause's misplaced grievance. For the reasons stated herein, the NRSC respectfully submits that the Federal Election Commission ("the Commission" or "FEC") should find that there is no reason to believe that the NRSC has violated the Federal Election Campaign Act of 1971, as amended ("the Act").

The Issues Raised by the Complaint

Cutting through the rhetoric of the complaint and its supplement, we find that Common Cause cites three aspects of the mailing at issue (a copy of which is appended to the Preztunik affidavit as Attachment A) that it claims subjected the monies received to NRSC "direction and control" and which the complainant argues therefore became excessive contributions by the NRSC to the campaigns that ultimately received the donations.

The specific matters complained of are:

1. the fact that the contributions were initiated by an NRSC solicitation to persons on its mailing list (Complaint at 3);

---

violation has occurred. As we discussed, the issues raised by Common Cause really are policy centered rather than fact specific and are better left to legislative or administrative resolution.

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2. the fact that the mailing did not identify candidates by name but instead by their campaign state (Complaint at 3); and

3. the fact that the NRSC was the payee of the checks received and deposited them in its own account for later distribution to the designated candidates (Complaint at 4, 6).

However, solicitation of earmarked contributions by conduits has been approved by the Commission and, especially in the case of a national political party committee such as the NRSC, is a constitutionally-protected activity. Additionally, there is no legal requirement that either a solicitation or a response identify a candidate by name rather than campaign, and the Commission has approved campaign-designated earmarking in the past. Moreover, because the NRSC mailing only concerned Senatorial races and there was only one such race and only one Republican candidate in any single state, there was absolutely no reasonable possibility of donor confusion. And finally, earmarking through the conduit's own account is specifically permitted by law and the NRSC has complied fully with all accounting and reporting requirements that insure that the conduit cannot direct or control the contribution.

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Factual Background

The NRSC is a national political party committee dedicated to the election of Republicans to the United States Senate. In addition to making direct contributions to candi-

dates' campaigns (see 2 U.S.C. § 441a(h)), and coordinated expenditures on their behalf (see 2 U.S.C. § 441a(d)(3)), the NRSC engages in a broad spectrum of party building and support activities. These activities have two essential and related goals -- one electoral, the other financial.

It is obvious that the foremost goal of the NRSC, indeed of any party committee, is the maximization through legitimate means of the votes cast in favor of the candidates that it endorses. Not too distantly subordinated, however, is the operative goal of attempting to assure that each Republican Senatorial campaign will have the maximum financial support allowed by law. Whether one agrees with Common Cause and others that campaigns are too expensive, or merely acknowledges that modern campaigning is a very costly activity, the fact remains that the best of candidates with the best of ideas can only engender broad-based support if they have the financial means to take advantage of increasingly-sophisticated communications technologies, data support, transportation and related services. This is hardly a revelation, but it is a truth.

In connection with its own fundraising and direct political support activities, the NRSC has developed a large group of reliable supporters with whom it communicates periodically by mail and to whom it offers a variety of programs and presentations concerning political and governmental developments.

In serving its nationwide support group, the NRSC has become cognizant of several important and related concepts.

For example, although any given Senatorial election campaign may be of an essentially local nature, certain unifying national issues emerge from the universe of campaigns in an election cycle. Persons interested in such national issues, even one as basic as attempting to maintain or gain party control of one of the legislative chambers, often are willing to contribute to campaigns for seats far from where they live or work. However, such persons, although vitally interested in national issues and the potential impact upon them of distant races, may have limited access to media coverage of those races and the candidates' prospects and needs.

Close attendance to national agendas is at the core of the national party committee's reason for existence and defines its need to associate itself with like-minded people throughout the country. Informing potential supporters and contributors of critical issues and important Senate races is among the most fundamental speech and associational activities undertaken by the NRSC, and the mailing at issue is exemplary of one type of this protected informational activity.

In carrying out its informational and associational functions, the NRSC recognized that, although the law may place a limit on the amount that an individual may contribute to a political campaign or committee, it cannot place a limit on the

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number of individuals who may so contribute. Based upon the advice of counsel (see Preztunik Affidavit ¶ 4) and Commission precedents (id.), the NRSC also was aware that a committee like itself was entitled to serve as a clearing house to forward individually-directed contributions to specific campaigns. The NRSC therefore concluded that it could further its party goals legitimately by calling attention to critical races and facilitating contributor support for Republican candidates by offering to serve as a conduit.

Statutory and Regulatory Requirements

Prior to undertaking the activity at issue in the MUR, the NRSC understood the legal requirements for conduiting activities and was intent upon full compliance with them. Preztunik Affidavit ¶¶ 5-8. That understanding begins with the Act itself which permits a person to receive a contribution on behalf of the political committee of someone else, subject to certain basic reporting and disclosure requirements detailed in regulations. See 2 U.S.C. §§ 432(b), 441a(a)(7)(A). This authority is amplified in the Commission's regulation (11 C.F.R. 110.6) which defines an earmarked contribution as one which a contributor directs, orally or in writing, to a candidate through a conduit or intermediary.

Because the conduit is merely the vehicle for the transfer of a donor-directed contribution to a designated campaign, the contribution is the donor's, not the conduit's, and

therefore counts against the donor's individual contribution limits. For the same reason, the conduit may not exercise direction or control over the choice of the recipient or the time of delivery of the earmarked contribution. Such contributions above $50 must be transferred to the ultimate recipient within 10 days of receipt (11 C.F.R. 102.8), and the contributions must be disclosed both on the conduit's next regularly-scheduled FEC report and in a special report to the recipient. 11 C.F.R. 110.6(c). Finally, the administrative costs of the conduiting activity are charged against the conduit's limits unless paid for the by recipient on a pro-rata basis. See General Counsel's Brief in Matter of Council for a Livable World, MUR 1028.

The Mailing At Issue

From both an operational and a constitutional standpoint, the NRSC had the unfettered right to associate and communicate with persons with whom it had dealt in the past to solicit their support in lawful activity, i.e., contributing to Senatorial campaigns through a conduit. However, the NRSC also was aware that, whatever it asked of its friends, they must remain free to accept or reject the NRSC's suggestions and the NRSC could have no discretion as to the disposition of any earmarked contributions that resulted from its communications. The mailing at issue in this MUR accommodated these interests and strictures.

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As the attached example of the September 2, 1986 mailing shows, the recipient was informed of the importance of the issue of Republican control of the United States Senate, and the mailing further described four specific Senatorial campaigns which required urgent assistance.[2/] The letter requested that donor send a contribution to be divided among the four campaigns and stated that a component of the NRSC had "agreed to serve as the central clearing house" for the distribution of the individual's donation. Although a specific amount was suggested, the reply form enclosed with the letter makes it clear that the donor had the complete option to designate the actual amount of his or her contribution and to confirm his or her intention that the "special candidate check" amount was to be split among the listed races.

As the mailing also demonstrates, although the law does not require it, the NRSC had arranged for a discrete-function bank account to deal with these conduited contributions. See also Preztunik Affidavit ¶ 8b. And from the time the letters were mailed, the NRSC's response was purely mechanical; it could not and did not exercise any direction or control over the donor-designated contributions it received as conduit. Nor could it comingle earmarked funds with other receipts.

2/ The four campaigns discussed varied slightly from letter to letter, but each letter mentioned four specific state campaigns in need of help.

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Unless the check received was accompanied by the reply sheet confirming the individual donor's intent to earmark his or her contribution, the NRSC did not deposit the check into its conduit account. Thus, each deposited check was supported by contemporaneous evidence of donor direction. Id.

Deposits of the checks into the designated conduiting account were made as quickly as possible and, in every case, the specific amounts earmarked were transmitted to the recipient campaigns within the 10 days the law requires; in most cases the transfer was made within 48 hours of NRSC's receipt. Id. at ¶ 8c. The NRSC also filed the required reports with the Commission and forwarded the appropriate special recipient reports to the campaigns, all in a timely manner. Id. at ¶ 8d. Finally, the NRSC assured that the administrative expenses of the conduiting activity properly were paid, either directly by the recipient campaigns or as a charge against the NRSC's coordinated expenditure limitations as to those recipients.

In sum, there is ample evidence of donor intention, and the NRSC was no more than a conduit acting mechanically, but scrupulously, in compliance with all legal requirements. The Complainant's specific charges to the contrary are without merit.

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I. NRSC SOLICITATION OF CONDUITED CONTRIBUTIONS IS A CONSTITUTIONALLY-PROTECTED ACTIVITY THAT CANNOT REPRESENT THE DIRECTION AND CONTROL FORBIDDEN BY FEC REGULATION.

The first of Common Cause's specific contentions is that the NRSC should be held to have exercised direction and control over the contributions received pursuant to the subject mailing because of its solicitation of the donors and suggestions as to how they might contribute. The complainant can offer no authority for this proposition and the law is quite to the contrary.3/

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3/ The term "direction or control" is not used in the statute authorizing conduiting, and it is not defined in the regulations or in any Advisory Opinion or reported decision of the Commission or a court. We note, however, that none of the three criteria that Common Cause would seek to impose to invoke the prohibition (solicitation, identification of the donee by campaign rather than by name, and receipt of checks to the order of a conduit's account rather than to the order of a candidate) ever has been held by the Commission to establish "direction or control" by a conduit. See MUR 335, Andrew Young, Congressman from Georgia, et al.; MUR 377, Citizens for John V. Tunney; MUR 409, Service Station Dealers PAC; MUR 427, Green for Senate Committee; MUR 446, UAW-V-CAP; MUR 491, Montgomery County Democratic Party, et al.; MUR 652, Vermont State Democratic Federal Campaign Committee, et al.; MUR 752, Missouri State Democratic Committee; MUR 1005, Rooney for Congress; MUR 1019, Bangor Democratic City Committee; MUR 1028, Council for a Livable World; MUR 1064, Perry R. Bass; MUR 1392, Carter-Kennedy Unity Dinner Committee, et al.; MUR 1462, Brown for U.S. Senate Independent Action, Inc.; MUR 1501, Rep. James Wright, Majority Congress Committee, et al.; MUR 1603, The Congressional Majority Committee; MUR 1868, Lewis E. Lehrman, et al.

In several of these cases, however, the Commission has, as we show infra, specifically approved each of the three challenged matters in the context of conduiting.

The NRSC's solicitation of supporters and potential donors is crucial to the attainment of its national political goals. This type of communication is subject to First Amendment protection both on associational and speech bases. As the Supreme Court has held, its "decisions involving associational freedoms establish that the right of association is a 'basic constitutional freedom,' Kusper v. Pontikes, 414 U.S. at 57, that is 'closely allied to freedom of speech and a right which, like free speech, lies at the foundation of a free society.' Shelton v. Tucker, 364 U.S. 479, 486 (1960)." Buckley v. Valeo, 424 U.S. 1, 25 (1976). See NAACP v. Button, 371 U.S. 415 (1963); NAACP v. Alabama, 357 U.S. 449 (1958). For the Commission to interpret the Act as Complainant would have it do -- to prevent a national political party committee from informing American citizens about crucial political issues and important races and inviting their participation in a manner specifically permitted by law -- would raise insuperable constitutional problems for the Commission.

While the Commission should decline Complainant's invitation, both now and in any subsequent rulemaking proceeding concerning conduiting, what is most germaine to the present inquiry is the fact that the NRSC is entitled to rely on the Commission's specific approval of solicitation by conduits.

For example, in Advisory Opinion 1980-46, Fed. Election Camp. Fin. Guide (CCH) ¶ 5508, p. 10,588 (July 8, 1980), the

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Commission took up the matter of a committee (the National Conservative Political Action Committee) whose asserted principal role was the making of independent expenditures on behalf of candidates. However, the Commission noted that when the subject committee solicited contributions for specific candidates with the intent that it would forward those contributions on behalf of the donors to the candidates, the committee was acting as a pure conduit and was required to report the contributions as such.

In requiring NCPAC to comply with the regulations governing earmarking, the Commission specifically considered the fact that it was NCPAC that was making the "clear suggestion that the individual receiving the communication make a contribution to a specific candidate through NCPAC as an intermediary." Id. at 10,590. But, the Commission noted, when the individual complied with the suggestion, "the individual contributor, not NCPAC, makes the choice whether to make a contribution to the specified candidate." Id. The Commission also noted that "[t]he fact that a potential contributor may decide against making a contribution indicates lack of control over the choice of the recipient candidate by NCPAC." Id.

In the instant MUR, the same evidence of a lack of direction and control is present. The recipient of the mailing was entirely free to have rejected the suggestion to contribute, as many in fact ignored the NRSC's request, and the NRSC had

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absolutely no discretion concerning the disposition and reporting of the monies that were directed by contributors.[4/]

In Advisory Opinion 1976-51, Fed. Election Camp. Fin. Guide (CCH) ¶ 5251, p. 10,157 (Sept. 14, 1976), the Commission held that an informal discussion group concerned with foreign policy issues was a political committee subject to registration and reporting requirements because of the likelihood that the group's members "would expressly assert their association when making a contribution to any of the candidates or committees that [they discussed]." The Commission also pointed out that the discussion group was subject to FEC earmarking regulations to the extent that it transmitted bundled contributions, thus expressly recognizing that it is entirely proper for an organization to discuss and solicit contributions directed by its members to candidates as long as the conduit complies with the rules regarding receipt, transmittal and reporting of the earmarked contributions.

Solicitation of earmarked contributions by the conduit itself also was approved by the Commission in Advisory Opinion 1983-18, Fed. Election Camp. Fin. Guide (CCH) ¶ 5662, p. 10,984 (Sept. 22, 1983). In that case, the Commission held that

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[4/] The checks sent to NCPAC were made out to individual campaigns, but as we have noted elsewhere, that fact is immaterial. Under the specific governing regulations, contributors are entitled to forward their earmarked contributions to the conduit's discrete function account.

employees may make contributions to their corporation's trade association PAC that are earmarked for the political action committee of a different trade association. The Commission specifically addressed the issue of solicitation and, finding it lawful in that case, again merely required complete compliance with the regulations governing conduiting.5/

Finally, in MUR 1028, Council for a Livable World, the General Counsel's Brief, which the Commission unanimously adopted in finding no probable cause to believe that the respondent had violated the Act and conduiting regulations, cites the fact that the Council's mailings profiled designated candidates and suggested that contributors donate to one or the other based on the initial of their last names. In considering whether this solicitation amounted to direction or control by the Council over the earmarked contributions, the General Counsel noted that control was absent because "the individual contributors, not the Council, determine whether or not contributions to candidates will be made." Brief at 4.

The General Counsel also noted that, "[i]n terms of direction, the Council does select the candidates for whom it

5/ A similar result was reached in Advisory Opinion 1981-57, Fed. Election Camp. Fin. Guide (CCH) ¶ 5636, p. 10,817 (Feb. 1, 1982), where the Commission held that the political action committee of a labor union was entitled both to solicit and to collect earmarked contributions through payroll deductions from members and then to distribute them to the designated candidates or committees.

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will make mailings and does suggest to its supporters that contributions be made." Id. But, "[a]fter a supporter has decided whether or not to act on the Council's suggestion, the Council cannot change the recipient or the amount." Id.

The same is true in the instant case. The NRSC made suggestions to its mailees quite similar to those made by the Council for a Livable World. However, those suggestions did not obligate a donor to contribute but, once he did, the NRSC could not alter the division requested or the campaigns designated. It was bound to undertake purely ministerial acts: the deposit and transmittal of the contribution to the designated campaign committees.

Based upon the foregoing holdings of the Commission and the overriding considerations of constitutional law, the NRSC respectfully submits that a conduit's solicitation of prospective donors is a protected activity and that the solicitation in the instant case cannot establish direction and control by the NRSC.

II. THE SOLICITATION OF CONTRIBUTIONS ON THE BASIS OF THE STATE OF THE REPUBLICAN CAMPAIGN IS ENTIRELY PERMISSIBLE.

Common Cause next takes issue with the NRSC's solicitation and receipt of earmarked contributions because the mailing and donor reply described the targeted Republican races by state rather than by the candidates' names. Again, there is no statutory or regulatory provision requiring the designation that the Complainant seeks, nor is there any need for one.

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Although the NRSC's mailing recipients surely had information that identified to them the specific candidates to whom they might earmark contributions, there is no requirement of such specific identification to or by the contributor. For example, in Advisory Opinion 1982-23, Fed. Election Camp. Fin. Guide (CCH) ¶ 5662, p. 10,862 (May 13, 1982), the Commission held that a terminating committee could make earmarked contributions through another committee. In so holding, the Commission specifically noted that it "has allowed a contribution to be earmarked for an undetermined Federal candidate where the facts indicated that the candidate was identifiable as to specific office, party affiliation, and election cycle." Indeed, in Advisory Opinion 1977-16, the Commission upheld earmarked contributions made to a "candidate" whose existence was not yet known.

In the instant case, the contributors clearly knew the office involved,[6] the party and the cycle, and while they also had reason to know a good deal more about the targeted candidates, this is all that the Commission has required.[7]

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[6] By definition, the NRSC is only involved in matters related to elections for the United States Senate and only seeks support for Republicans. There was no state which in 1986 had more than one Senate seat at issue and there was no more than one Republican candidate in any Senate race. The potentiality for confusion was nil.

[7] In MUR 377, Citizens for John v. Tunney, the matter which led to the regulations we are discussing here, the General Counsel, whose recommendation was accepted by the Commission, concluded that party-committee conduiting regulations should be applied in a situation where contributors issued no

III. EARMARKED CONTRIBUTIONS MADE PAYABLE TO A CONDUIT'S ACCOUNT ARE SPECIFICALLY PERMITTED BY LAW.

2 U.S.C. § 441a(a)(8) states that conduited contributions are to be treated as those of the donor not the intermediary. The section then provides that "[t]he intermediary or conduit shall report the original source and the intended recipient of such contribution to the Commission and to the intended recipient. If Congress anticipated that conduits merely would pass along checks made out to the ultimate recipient, as the Complainant argues, this identification provision would be superfluous. However, Congress clearly anticipated that earmarked contributions could pass through the conduit's account and the Commission specifically countenanced this form of conduiting in its regulations.

Thus, 11 C.F.R. 110.6 tracks the languages of section 441a(a)(8) of the Act in providing that "(a) All contributions by a person made on behalf of or to a candidate which are in any way earmarked or otherwise directed to the candidate through an intermediary or conduit, are contributions from the person to the

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specific instructions as to who would ultimately receive their contributions but merely "were aware that a portion of their monies would be used to support the Tunney Committee." General Counsel's Report at 7. Neither the General Counsel nor the Commission found these non-specific "designations" inappropriate as long as it was understood that their transmittal was a conduiting activity and that the contributions were subject to individual limits.

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candidate." Emphasis supplied. The regulation then provides for the two required forms of conduit reporting and contains the following specific mandate (11 C.F.R. 110.6(c)(1)(i)): "If the contribution passed through the conduit's account, disclose each contribution, regardless of amount, on schedules of itemized receipts and expenditures." Emphasis supplied.

There can be no question that receipt of donor's contributions into the conduit's discrete-function account, followed by the transmittal of the earmarked amount to the designated campaign committee through the conduit's check is specifically permitted by law. This approved method of conduit transfer cannot, by definition, amount to direction and control by the conduit. Common Cause's suggestion to the contrary is frivolous.8/

8/ At least two Commission Advisory opinions involve approved earmarking through the conduits' bank accounts. In Advisory Opinion 1981-57, supra, at 10,818, the Commission, having approved solicited earmarking, stated: "[t]he Act and Commission regulations permit the use of a payroll deduction plan for contributions to the separate segregated fund of either a corporation or a union."

And, in Advisory Opinion 1981-21, Fed. Election Camp. Fin. Guide (CCH) ¶ 5611, p. 10,776 (July 9, 1981), the Commission went so far as to hold that a person may authorize the transfer of previously-made contributions from his account with a state PAC to a federal PAC account.

IV. THE COMPLAINT RAISES ARGUMENTS THAT ARE INAPPROPRIATE TO AN ADJUDICATION ALTHOUGH THEY MIGHT BE ADDRESSED IN A LEGISLATIVE OR RULEMAKING CONTEXT.

Having disposed of the unavailing specific charges against the NRSC's conduiting activity, we turn to a consideration of what this complaint is really about. Although it is addressed to a particular NRSC mailing soliciting donor-directed contributions to various Senatorial campaigns, the NRSC's compliance with current legal requirements concerning conduiting is manifest enough that the complaint should be seen as having a broader goal -- the elimination of conduiting altogether.

That larger issue properly may be addressed by Congress and, to some degree, through administrative rulemaking such as that now underway before the Commission. See 51 Fed. Reg. 146 (July 30, 1986). But it is highly inappropriate to an adjudicatory matter such as this which must be controlled by the law as it is, not the law that Complainant would have adopted by fiat.

Complainant has been a highly-vocal advocate of revision of campaign-finance laws. An ardent proponent of public financing, it believes that elections are too expensive and that the need for money subjects incumbents and challengers to corrupting influences.9/ The evidentiary basis for its general attack is far from clear, and the attack is particularly

9/ Besides the complaint and its supplement, see e.g., Christian Science Monitor, October 14, 1986, at 3; Industry Week, April 14, 1986, at 27; National Journal, Vol. 17, No. 50, p. 2886.

tenuous when directed at the conduiting activity of a political party committee.

American political parties are not ideological monoliths demanding particular views of their candidates and able to impose across-the-board party loyalty. Both major parties represent a spectrum of political beliefs unified by a few transcendent characteristics or emphases, for example, concerning the proper role of government in matters of social or economic policy, or the relationship between national defense and foreign policy. But there is nothing to suggest that parties can somehow gain undue influence with their candidates or that there is something nefarious about party supporters earmarking their statutorily-limited contributions through party conduits. Indeed, there is much that is pro-democratic about it.

The party conduit stands as a kind of buffer between a contributor, who may have a very limited interest in mind, and the candidate. Even more importantly, the party that is able to galvanize supporters to participate through it in the political process is achieving something to be encouraged, not condemned.

This is not to say that conduiting should not be regulated and the disclosure and reporting requirements should not be reaffirmed or clarified. The NRSC has complied assiduously with present requirements and has no objection to any reasonable form of disclosure. The Commission's consideration of such measures, however, should take place in another context.

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CONCLUSION

For the foregoing reasons, the NRSC respectfully submits that the Commission should find no reason to believe that the NRSC has violated the Act through the conduiting activity that is the subject of this MUR.

Yours very truly,

Stuart M. Gerson

Stuart M. Gerson,
Counsel to the National Republican
Senatorial Committee

SMG:cr

cc: Commissioners Aikens
Elliot
Josefiak
McDonald
McGarry
Thomas

Rodney A. Smith
James K. Wholey, Esquire

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BEFORE THE
FEDERAL ELECTION COMMISSION

COMMON CAUSE Complainant, v. NATIONAL REPUBLICAN SENATORIAL COMMITTEE, Respondent.	)	MUR 2282

AFFIDAVIT

CITY OF WASHINGTON)
) SS.
DISTRICT OF COLUMBIA)

MARYANNE E. PREZTUNIK, being duly sworn, deposes and says:

1. I am the Comptroller and Director of Administration of the National Republican Senatorial Committee ("NRSC" or "the Committee") located at 440 First Street, N.W., Suite 600, Washington, D.C. 20001. I have held the position of Comptroller of the NRSC since February 14, 1983, and, in addition, have served as the NRSC's Director of Administration since January, 1985.

2. As the Comptroller and Director of Administration of the NRSC, I am responsible for the financial and day-to-day

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operations of the Committee as well as the fulfillment of the NRSC's disclosure obligations to the Federal Election Commission ("FEC" or "the Commission"). Moreover, I have signatory authority on all of the Committee's bank accounts.

3. In conjunction with the need to assure that Republican Senatorial candidates would receive the broadest financial support allowable by law, the NRSC, in connection with the 1986 Senatorial campaigns, decided that it would be available to serve as a conduit for donor-directed contributions to individual campaigns. As a result of this decision, the NRSC sent mailings, among which are the subject of this Matter Under Review, to its donor base. See Attachment A (sample solicitation letter including reply card and envelope). In these mailings, the Committee informed potential donors of races where there was particular need for funding, and asked them if they would earmark contributions through the NRSC to those Senate campaigns. The NRSC served as the conduit for said donor-directed contributions in the manner prescribed by the Federal Election Campaign Act of 1971, as amended, ("the Act") and the regulations promulgated thereunder.

4. I was aware that this conduiting activity was undertaken upon the advice of counsel and in reliance on past FEC Advisory Opinions and Enforcement Actions including the FEC General Counsel's analysis in Matter of Council for a Livable World, MUR 1028.

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5. From the outset, the NRSC was aware of, and was careful fully to comply with, the following statutory and regulatory requirements for serving as a conduit:

a. The basic rule that a conduit is merely the vehicle for the transfer of an individual's contribution to a designated campaign. The contribution is that of the donor, not the conduit. Thus, the conduit can exercise no direction or control over the choice of the intended recipient of the contribution or the time of delivery of the contribution;

b. The requirement that an earmarked contribution counts against the donor's individual contribution limits as set forth by law, and not against the contribution limits of the conduit;

c. The rule that a conduit must forward an earmarked contribution to the intended recipient committee within ten days of the conduit's receipt thereof;

d. The requirement that a political committee, such as the NRSC, which serves as a conduit of donor-designated contributions must disclose these earmarked contributions, regardless of amount, on two separate FEC reports: the committee's next regularly-scheduled report, and a special report to the recipient; and

e. The rule that the administrative costs incurred in the operation of a conduiting activity and in collecting and distributing the contributions to the designated candidates must be paid for by the recipient campaigns on a pro-rata basis or counted as an in-kind contribution to, or coordinated party expenditure on behalf of, the recipient candidate committees.

6. I have been involved from the outset with the implementation of the NRSC's conduiting activities. In particular, I formulated procedures to ensure that donor-directed contributions were transferred to the intended recipient committees in a timely fashion and were properly

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reported to the FEC as well as the recipient committees, and that the recipient Senatorial campaigns paid their pro-rata share of the costs of these conduiting activities.

7. The NRSC's conduiting activities were conducted at all times in full compliance with the requirements outlined in Paragraph 5. Moreover, the NRSC undertook additional steps beyond those required by FEC regulations to ensure that its conduiting activities would fall within the parameters previously set forth by the Commission for similar activities.

8. Specifically, the NRSC thoroughly complied with the FEC requirements regarding conduiting activities outlined in Paragraph 5 as follows:

a. At no time did or could the NRSC exercise direction or control over the choice of the intended recipient of a donor-designed contribution or the time of delivery of the contribution to the intended beneficiary. The conduit response cards which donors returned to the NRSC along with their contribution checks clearly demonstrated the donors' intent to direct their "special candidate" contributions to be split equally among specific campaigns. See Attachment A.

Thus, as it is legally required to do, the NRSC automatically processed such contribution checks as earmarked contributions to the intended recipient campaigns. No contribution checks were processed by the NRSC as earmarked contributions unless the Committee had documentation supporting the individual donor's intent to earmark his/her contribution;

b. All monies received by the NRSC in response to a conduit mailing were deposited into the NRSC's discrete function account, a special account opened solely for such proceeds. The monies in this discrete function account were never commingled with NRSC funds. Further, the only

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transfers made from the discrete function account were to Senatorial campaign committees for which the NRSC had received earmarked contributions.

As the maintenance of a separate account by a conduit for earmarked contributions is not prescribed by the FEC, the existence of this separate account serves to underscore that these earmarked contributions were subject to neither the direction nor control of the NRSC;

c. The NRSC's compliance with the ten-day transfer rule for earmarked contributions was scrupulous. In most instances, donor-directed contributions were transferred to the intended recipient committee within forty-eight (48) hours after their receipt by the NRSC. Without exception, earmarked contributions were transferred to their proper recipients within the ten (10) days allowed by law;

d. The extensive reports filed by the NRSC with the FEC during 1986 included the disclosure of all earmarked contributions received by the Committee. Moreover, all these required FEC reports were filed with the Commission on a timely basis. Further, in every instance earmarked contributions transferred to the intended recipient campaigns were accompanied by special recipient reports as required by law. See Attachment B (sample report pages, illustrating the manner in which the NRSC satisfied the FEC's reporting requirements with respect to conduiting earmarked contributions);

e. Recipients of donor-directed contributions either were billed on a monthly basis their pro-rata share of the administrative costs incurred by the NRSC in, or the NRSC charged that amount against the coordinated expenditures that it could make on behalf of the candidate's campaign. These charges were computed on a "per contributor" basis, with the actual amount determined by the direct fundraising costs associated with the mailing.

f. Finally, the NRSC sent thank you letters to contributors under the earmarking activity which confirming that their contributions had been forwarded pursuant to their request. Individual

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campaigns also were requested to send thank you letters to their contributors from this activity.

9. Therefore, as demonstrated herein, the NRSC's conduiting activities fully complied with applicable FEC regulations and precedents.

I declare under penalty of perjury that, to the best of my knowledge, the foregoing is true and accurate.

MARYANNE E. PREZTUNIK
Comptroller and Director
of Administration
National Republican
Senatorial Committee
440 First Street, N.W.
Suite 600
Washington, D.C. 20001

City of Washington)
)
District of Columbia)

I, Diana L. Richardson, a Notary Public, hereby certify that on the 15th day of December, 1986, there personally appeared before me Maryanne E. Preztunik, who acknowledged signing the foregoing document and that the statements therein are true.

Diana L. Richardson
Notary Public

DIANA L. RICHARDSON
NOTARY PUBLIC, DISTRICT OF COLUMBIA
My Commission Expires November 14, 1991

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Attachment A
To Affidavit

OFFICE OF THE
VICE PRESIDENT
THE HONORABLE GEORGE BUSH

September 2, 1986

Mr.

Dear Mr. ,

Our Republican Senate candidates in South Dakota, Nevada, Louisiana, and California are on the verge of running out of money.

And if these candidates don't receive emergency funding fast, they'll be defeated on November 4th.

President Reagan and I have discussed this situation, and we're both very concerned. Because a shift of just 4 seats will give control of the Senate back to the Democrats.

I regret having to send this urgent letter, but in my political career no letter has ever been more important.

And because you are one of our Party's most dedicated supporters, I felt I had to write to you myself to ask if you'd please send an immediate contribution of $25 today.

With the November elections only 63 days away, we don't have a single moment to spare. For if each of these four candidates don't raise at least $236,500 in the next 21 days -- they'll lose.

It's that simple -- and that frightening!

That's why I'm counting on you to rush me your check for $25 by return mail today.

There is no doubt that 1986 is a pivotal election year. And for you, myself and President Reagan -- the stakes couldn't be higher.

You see, on November 4th the American people will decide whether the Republican Leadership in the U.S. Senate is going to continue working "hand-in-hand" with President Reagan guiding our Nation.

Or whether our adversaries are going to be given the power to pull us off course.

And if these four candidates end up losing on election day

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because they ran out of money at this critical "Make or Break" point in their campaigns, then we're almost certainly going to lose President Reagan's precious Republican Majority in the U.S. Senate.

If this happens, you and I will never forgive ourselves if we know in our hearts we hadn't done everything within our power to help these four candidates in this -- their greatest hour of need.

That's why, as Vice President and therefore President of the U.S. Senate, I'm doing everything I can to help each of these four candidates. But I'm only one man. And my efforts alone aren't enough to ensure victory.

The hard reality is this: all four of these fine Republican Senate candidates desperately need your help today.

And your action -- or inaction -- now will quite literally mean political life or death for each of these candidates.

That's why it's absolutely essential that you send in an immediate $25 contribution today.

To expedite the distribution of your contribution, the Republican Presidential Task Force has agreed to serve as the central clearing house.

If you'll write out your $25 check directly to the Task Force, they'll see to it that every penny of your generous contribution is evenly split and immediately delivered to each of these four candidates.

Please, whatever you decide to send, even if it's not $25, I urge you to send it to me without delay.

I'm depending on you _____. And depending on a loyal friend like you to help me solve this crisis is good enough for me.

Sincerely,

George Bush

George Bush

P.S. I repeat! Without your immediate financial support, our Republican Senate candidates in South Dakota, Nevada, Louisiana, and California are going to lose. And we in turn could lose Republican control of the Senate.

That's why I urge you to send an emergency contribution of $25 today. Thank you!

REPUBLICAN PRESIDENTIAL TASK FORCE

EMERGENCY CANDIDATE SUPPORT REPLY

URGENT DEADLINE: SEPTEMBER 23RD

Dear Vice President Bush,

I understand that our Senate campaigns in South Dakota, Nevada, Louisiana, and California need immediate financial assistance to win this November. To make sure our candidates have the funds they need, I'm enclosing the most generous contribution I can to be split equally among them. Enclosed please find my special candidate check for:

( ) $40 ( ) $25 ( ) $___ Other

Mr.

6J13 00873690

PLEASE MAKE YOUR CHECK PAYABLE TO THE REPUBLICAN PRESIDENTIAL TASK FORCE.

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SCHEDULE A — ITEMIZED RECEIPTS — LINE NUMBER 11A
PERIOD: FROM 07/01/86 TO 09/30/86 — PAGE 1000 OF _____

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NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

FULL NAME, MAILING ADDRESS	EMPLOYER/OCCUPATION	DATE	AMOUNT
Billman , John A 3960 Woodsale Ave. Minneapolis, MN 55416 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE: _____ EARMARKED COMMITTEE(S): James Abdnor Jim Broyhill Dick Snelling Jim Santini	09/15/86	$ 25.00 $ 6.25 $ 6.25 $ 6.25 $ 6.25
Billmeyer , Mary P 701 N. Montgomery Ojai, CA 93023 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE: _____ EARMARKED COMMITTEE(S): Kenneth B. Kramer	09/16/86	$ 10.00 $ 10.00
Billmeyer , Miss 701 N. Montgomery Ojai, CA 93023 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE: _____ EARMARKED COMMITTEE(S): Jeremiah A. Denton Paula Hawkins Kenneth B. Kramer Kit Bond	09/25/86	$ 20.00 $ 5.00 $ 5.00 $ 5.00 $ 5.00
Billotte , Guy E. 786 Woodland Rd Mansfield, OH 44906 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE: _____ EARMARKED COMMITTEE(S): Jeremiah A. Denton Mack F. Mattingly James Abdnor Ase Hutchinson	09/15/86	$ 25.00 $ 6.25 $ 6.25 $ 6.25 $ 6.25

PAGE TOTAL: $ 90.00

SCHEDULE B — ITEMIZED DISBURSEMENTS — LINE NUMBER 21
FROM : 860701 TO : 860930 — PAGE 4 OF 84

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NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

FULLNAME, MAILING ADDRESS	PURPOSE OF DISBURSEMENT	DATE	AMOUNT
Asa Hutchinson for U.S. Senate Committee #1 RIVERFRONT PLACE #1 River Front Place North Little Rock, AR 72114	DISBURSEMENT FOR: GENERAL DISTRIBUTION OF EARMARKED CONTRIBUTIONS	08/27/86	$50.0 (SEE MEMO ENTRY)
Asa Hutchinson for U.S. Senate Committee #1 RIVERFRONT PLACE #1 River Front Place North Little Rock, AR 72114	DISBURSEMENT FOR: GENERAL DISTRIBUTION OF EARMARKED CONTRIBUTIONS	07/21/86	$70.0 (SEE MEMO ENTRY)
Asa Hutchinson for U.S. Senate Committee #1 RIVERFRONT PLACE #1 River Front Place North Little Rock, AR 72114	DISBURSEMENT FOR: GENERAL DISTRIBUTION OF EARMARKED CONTRIBUTIONS	09/16/86	$2052.0 (SEE MEMO ENTRY)
Asa Hutchinson for U.S. Senate Committee #1 RIVERFRONT PLACE #1 River Front Place North Little Rock, AR 72114	DISBURSEMENT FOR: GENERAL DISTRIBUTION OF EARMARKED CONTRIBUTIONS	08/27/86	$29020.0 (SEE MEMO ENTRY)
Asa Hutchinson for U.S. Senate Committee #1 RIVERFRONT PLACE #1 River Front Place North Little Rock, AR 72114	DISBURSEMENT FOR: GENERAL DISTRIBUTION OF EARMARKED CONTRIBUTIONS	09/16/86	$6.0 (SEE MEMO ENTRY)
Broyhill for Senate Committee 2920 HIGHWOODS BLVD, SUITE 100 Post Office Box 40967 Raleigh, NC 27629	DISBURSEMENT FOR: GENERAL DISTRIBUTION OF EARMARKED CONTRIBUTIONS	09/25/86	$8142. (SEE MEMO ENTRY)
SUBTOTAL OF DISBURSEMENTS THIS PAGE :			$39,340.76

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SCHEDULE B — ITEMIZED DISBURSEMENTS — LINE NUMBER 21
FROM : 860701 TO : 860930 — PAGE 13 OF 84

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NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

FULLNAME, MAILING ADDRESS	PURPOSE OF DISBURSEMENT	DATE	AMOUNT
Friends for Jim Abanor Post Office Box 806 Pierre, SD 57501	DISBURSEMENT FOR: GENERAL DISTRIBUTION OF EARMARKED CONTRIBUTIONS	09/25/86 (SEE MEMO ENTRY)	$23611.2
Friends for Jim Abanor Post Office Box 806 Pierre, SD 57501	DISBURSEMENT FOR: GENERAL DISTRIBUTION OF EARMARKED CONTRIBUTIONS	09/16/86 (SEE MEMO ENTRY)	$6596.5
Friends for Jim Abanor Post Office Box 806 Pierre, SD 57501	DISBURSEMENT FOR: GENERAL DISTRIBUTION OF EARMARKED CONTRIBUTIONS	07/28/86 (SEE MEMO ENTRY)	$13023.3
Friends for Jim Abanor Post Office Box 806 Pierre, SD 57501	DISBURSEMENT FOR: GENERAL DISTRIBUTION OF EARMARKED CONTRIBUTIONS	07/21/86 (SEE MEMO ENTRY)	$8637.6
Friends for Jim Abanor Post Office Box 806 Pierre, SD 57501	DISBURSEMENT FOR: GENERAL DISTRIBUTION OF EARMARKED CONTRIBUTIONS	07/23/86 (SEE MEMO ENTRY)	$8617.0
Friends for Jim Abanor Post Office Box 806 Pierre, SD 57501	DISBURSEMENT FOR: GENERAL DISTRIBUTION OF EARMARKED CONTRIBUTIONS	07/08/86 (SEE MEMO ENTRY)	$1885.0
Friends for Jim Abanor Post Office Box 806 Pierre, SD 57501	DISBURSEMENT FOR: GENERAL DISTRIBUTION OF EARMARKED CONTRIBUTIONS	09/08/86 (SEE MEMO ENTRY)	$1963.1
Friends for Jim Abanor Post Office Box 806 Pierre, SD 57501	DISBURSEMENT FOR: GENERAL DISTRIBUTION OF EARMARKED CONTRIBUTIONS	08/27/86 (SEE MEMO ENTRY)	$2979.0
Friends for Jim Abanor Post Office Box 806 Pierre, SD 57501	DISBURSEMENT FOR: GENERAL DISTRIBUTION OF EARMARKED CONTRIBUTIONS	08/11/86 (SEE MEMO ENTRY)	$7915.1
SUBTOTAL OF DISBURSEMENTS THIS PAGE :		$	75,128.44

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SCHEDULE B — ITEMIZED DISBURSEMENTS — LINE NUMBER 21
FROM : 860701 TO : 860930 — PAGE 32 OF 32

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NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

FULLNAME, MAILING ADDRESS	PURPOSE OF DISBURSEMENT	DATE	AMOUNT
Jake Garn Re-election Committee (1986/pcc) 1815 "h" Street Nw Suite 1000 Washington, DC 20006	DISBURSEMENT FOR: GENERAL DISTRIBUTION OF EARMARKED CONTRIBUTIONS	09/16/86 (SEE MEMO ENTRY)	$60.0
Jake Garn Re-election Committee (1986/pcc) 1815 "h" Street Nw Suite 1000 Washington, DC 20006	DISBURSEMENT FOR: GENERAL DISTRIBUTION OF EARMARKED CONTRIBUTIONS	08/01/86 (SEE MEMO ENTRY)	$90.0
Jeremiah Denton For Senate Committee Po Box 6237 Mobile, AL 36660	DISBURSEMENT FOR: GENERAL DISTRIBUTION OF EARMARKED CONTRIBUTIONS	09/25/86 (SEE MEMO ENTRY)	$13427.0
Jeremiah Denton For Senate Committee Po Box 6237 Mobile, AL 36660	DISBURSEMENT FOR: GENERAL DISTRIBUTION OF EARMARKED CONTRIBUTIONS	09/25/86 (SEE MEMO ENTRY)	$2082.9
Jeremiah Denton For Senate Committee Po Box 6237 Mobile, AL 36660	DISBURSEMENT FOR: GENERAL DISTRIBUTION OF EARMARKED CONTRIBUTIONS	09/16/86 (SEE MEMO ENTRY)	$100.0
Jeremiah Denton For Senate Committee Po Box 6237 Mobile, AL 36660	DISBURSEMENT FOR: GENERAL DISTRIBUTION OF EARMARKED CONTRIBUTIONS	09/16/86 (SEE MEMO ENTRY)	$2685.1
Jeremiah Denton For Senate Committee Po Box 6237 Mobile, AL 36660	DISBURSEMENT FOR: GENERAL DISTRIBUTION OF EARMARKED CONTRIBUTIONS	08/27/86 (SEE MEMO ENTRY)	$50.
SUBTOTAL OF DISBURSEMENTS THIS PAGE :			$ 18,495.02

SCHEDULE B — ITEMIZED DISBURSEMENTS — LINE NUMBER 21
FROM : 01/01/86 TO : 12/31/86 — PAGE 221 OF 222

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NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

FULLNAME, MAILING ADDRESS	PURPOSE OF DISBURSEMENT	DATE	AMOUNT
Mattingly For Senate P.o.box 1986 Brunswick, GA 31521	DISBURSEMENT FOR: GENERAL DISTRIBUTION OF EARMARKED CONTRIBUTIONS	09/08/86	$140.0 (SEE MEMO ENTRY)
Mattingly For Senate P.o.box 1986 Brunswick, GA 31521	DISBURSEMENT FOR: GENERAL DISTRIBUTION OF EARMARKED CONTRIBUTIONS	09/14/86	$200.0 (SEE MEMO ENTRY)
Mattingly For Senate P.o.box 1986 Brunswick, GA 31521	DISBURSEMENT FOR: GENERAL DISTRIBUTION OF EARMARKED CONTRIBUTIONS	09/16/86	$996.7 (SEE MEMO ENTRY)
Mattingly For Senate P.o.box 1986 Brunswick, GA 31521	DISBURSEMENT FOR: GENERAL DISTRIBUTION OF EARMARKED CONTRIBUTIONS	07/21/86	$90.0 (SEE MEMO ENTRY)
Mattingly For Senate P.o.box 1986 Brunswick, GA 31521	DISBURSEMENT FOR: GENERAL DISTRIBUTION OF EARMARKED CONTRIBUTIONS	08/11/86	$50.0 (SEE MEMO ENTRY)
Mattingly For Senate P.o.box 1986 Brunswick, GA 31521	DISBURSEMENT FOR: GENERAL DISTRIBUTION OF EARMARKED CONTRIBUTIONS	07/28/86	$180.0 (SEE MEMO ENTRY)
Mattingly For Senate P.o.box 1986 Brunswick, GA 31521	DISBURSEMENT FOR: GENERAL DISTRIBUTION OF EARMARKED CONTRIBUTIONS	09/25/86	$7332. (SEE MEMO ENTRY)
Mattingly For Senate P.o.box 1986 Brunswick, GA 31521	DISBURSEMENT FOR: GENERAL DISTRIBUTION OF EARMARKED CONTRIBUTIONS	08/21/86	$640. (SEE MEMO ENTRY)
Mattingly For Senate P.o.box 1986 Brunswick, GA 31521	DISBURSEMENT FOR: GENERAL DISTRIBUTION OF EARMARKED CONTRIBUTIONS	08/06/86	$140. (SEE MEMO ENTRY)
SUBTOTAL OF DISBURSEMENTS THIS PAGE : $			9,769.62

SCHEDULE B — ITEMIZED EXPENDITURES — LINE NUMBER 21
PERIOD: FROM 07/01/86 TO 09/30/86 — PAGE 2437 OF _____

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--- MEMO ENTRY ---

NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS
CONTRIBUTIONS EARMARKED FOR: Mattingly For Senate

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Carroll , Don 228 Royal Oaks Huntsville, TX 77340 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED NRSC CHECK	09/15/86	09/16/86	$ 18.75
Ogden , Hayden R.R. 1, Box 160-B Henderson, KY 42420 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED NRSC CHECK	09/15/86	09/16/86	$ 5.00
Billotte , Guy E. 786 Woodland Rd Mansfield, OH 44906 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED NRSC CHECK	09/15/86	09/16/86	$ 6.25
Menning , Russell 312 Main Street Neenah, WI 54956 RECEIPT FOR: GENERAL	INFORMATION REQUESTED Retired NRSC CHECK	09/15/86	09/16/86	$ 6.25
Timm , Hannah 101 Captainswalk Milford, CT 06460 RECEIPT FOR: GENERAL	INFORMATION REQUESTED Housewife NRSC CHECK	09/15/86	09/16/86	$ 17.50
Dornstacter , Josephine 27012 Hilliard Rd. Cleveland, OH 44145 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED NRSC CHECK	09/15/86	09/16/86	$ 5.00

PAGE TOTAL: $ 58.75 (MEMO)

SCHEDULE B — ITEMIZED EXPENDITURES — LINE NUMBER 21
PERIOD: FROM 07/01/86 TO 09/30/86 — PAGE 24095 OF ____

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--- MEMO ENTRY ---

NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS
CONTRIBUTIONS EARMARKED FOR: Jeremiah Denton For Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Ogden , Hayden R.R. 1, Box 160-B Henderson, KY 42420 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED NRSC CHECK	09/15/86	09/16/86	$ 5.00
Rowe , Alma 715 Natlin Drive Fostoria, OH 44830 RECEIPT FOR: GENERAL	INFORMATION REQUESTED Homemaker NRSC CHECK	09/15/86	09/16/86	$ 2.50
Billotte , Guy E. 786 Woodland Rd Mansfield, OH 44906 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED NRSC CHECK	09/15/86	09/16/86	$ 6.25
Menning , Russell 312 Main Street Neenah, WI 54956 RECEIPT FOR: GENERAL	INFORMATION REQUESTED Retired NRSC CHECK	09/15/86	09/16/86	$ 6.25
Evett , Eleanor 5707 W. 109th Street Crestwood, IL 60445 RECEIPT FOR: GENERAL	INFORMATION REQUESTED Retired NRSC CHECK	09/15/86	09/16/86	$ 6.25
Timm , Hannah 101 Captainswalk Milford, CT 06460 RECEIPT FOR: GENERAL	INFORMATION REQUESTED Housewife NRSC CHECK	09/15/86	09/16/86	$ 17.50

PAGE TOTAL: $ 43.75 (MEMO)

SCHEDULE B — ITEMIZED EXPENDITURES — LINE NUMBER 21
PERIOD: FROM 07/01/86 TO 09/30/86 — PAGE [illegible] OF ____

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--- MEMO ENTRY ---

NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS
CONTRIBUTIONS EARMARKED FOR: Friends for Jim Abdnor

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Rutledge , Sylvester Rt 1 Bx 122 Wellton, AZ 85356 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED NRSC CHECK	09/15/86	09/16/86	$ 1.25
Morillo , Luis 2211 Wimbleton Ln La Habra, CA 90631 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED NRSC CHECK	09/15/86	09/16/86	$ 2.50
Ogden , Hayden R.R. 1, Box 160-B Henderson, KY 42420 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED NRSC CHECK	09/15/86	09/16/86	$ 5.00
Billotte , Guy E. 786 Woodland Rd Mansfield, OH 44906 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED NRSC CHECK	09/15/86	09/16/86	$ 6.25
Swigart , Merrill 653 Brae Burn Mansfield, OH 44907 RECEIPT FOR: GENERAL	INFORMATION REQUESTED Retired NRSC CHECK	09/15/86	09/16/86	$ 5.00
Bednarczyk , Stanley 417 Walnut Street French Lick, IN 47432 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED NRSC CHECK	09/15/86	09/16/86	$ 8.75

PAGE TOTAL: $ 28.75 (MEMO)

SCHEDULE B — ITEMIZED EXPENDITURES — LINE NUMBER 21
PERIOD: FROM 07/01/86 TO 09/30/86 — PAGE 25345 OF _____

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--- MEMO ENTRY ---

NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS
CONTRIBUTIONS EARMARKED FOR: Asa Hutchinson for U.S. Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Carroll , Don 228 Royal Oaks Huntsville, TX 77340 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED NRSC CHECK	09/15/86	09/16/86	$ 18.75
Ogden , Hayden R.R. 1, Box 160-B Henderson, KY 42420 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED NRSC CHECK	09/15/86	09/16/86	$ 5.00
Billotte , Guy E. 786 Woodland Rd Mansfield, OH 44906 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED NRSC CHECK	09/15/86	09/16/86	$ 6.25
Menning , Russell 312 Main Street Neenah, WI 54956 RECEIPT FOR: GENERAL	INFORMATION REQUESTED Retired NRSC CHECK	09/15/86	09/16/86	$ 6.25
Timm , Hannah 101 Captainswalk Milford, CT 06460 RECEIPT FOR: GENERAL	INFORMATION REQUESTED Housewife NRSC CHECK	09/15/86	09/16/86	$ 17.50
Dornstadter , Josephine 27012 Hilliard Rd. Cleveland, OH 44145 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED NRSC CHECK	09/15/86	09/16/86	$ 5.00

PAGE TOTAL: $ 58.75 (MEMO)

BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

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In the Matter of	)	
	)	
National Republican Senatorial Committee:	)	MUR 2282
Richard G. Nelson, as Treasurer	)	

GENERAL COUNSEL'S REPORT

The complainant Common Cause is a nonprofit membership organization with approximately 264,000 members and states that it promotes governmental and electoral reform on a nonpartisan basis. It filed the administrative complaint in this matter on October 28, 1986, and supplemented it on November 14, 1986. The complaint alleges that the National Republican Senatorial Committee ("NRSC") made contributions to Republican Senate candidates in excess of the limitation of 2 U.S.C. § 44la(h).

The respondent NRSC is a national political party committee with the purpose of electing Republicans to the United States Senate. The respondent Richard G. Nelson[1/] is the treasurer of NRSC-Contributions, a registered political committee that reports receipts for the NRSC, and the treasurer of NRSC-Expenditures, a registered political committee that reports disbursements for the NRSC. The respondents filed their response to the administrative complaint on December 16, 1986, in which they denied the allegations in the complaint and defended the NRSC's actions in soliciting, transmitting, and reporting contributions to Republican Senate candidates as earmarked contributions.

1/ At the time the complaint was filed, Rodney A. Smith was treasurer of these committees. On February 19, 1987, the NRSC amended its Statements of Organization to show Richard G. Nelson as treasurer.

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After analyzing the submitted materials and reports filed with the Commission and considering the relevant law, the Office of General Counsel recommends that the Commission find reason to believe the NRSC and Richard G. Nelson. as treasurer, violated 2 U.S.C. §§ 441a(a)(8) and 441a(h) and 11 C.F.R. § 110.6(d)(2). Furthermore, on the basis of the information submitted in this matter, this Office also recommends that the Commission find reason to believe the NRSC and Richard G. Nelson, as treasurer, violated 2 U.S.C. § 441d(a).

FACTUAL AND LEGAL ANALYSIS

This section is divided into separate subdivisions for discussions of (1) the administrative complaint, (2) the Respondents' submissions, (3) the relevant law, (4) background information from the NRSC's reports; and (5) an analysis and recommendations.

A. Administrative Complaint

The complainant sets forth two basic theories regarding the alleged violations, as alternatives, in its administrative complaint: (1) that the contributions which the NRSC reported as earmarked by the contributors were not, in fact, earmarked by them; and (2) even if these contributions are viewed as earmarked, the NRSC exercised direction and control over the choice of the recipient candidates.

(1) Earmarking

With regard to the first theory, the complaint states that the NRSC solicited contributions through direct mail to be evenly

divided and delivered to four Republican Senate candidates, who were not identified by name but only by reference to four specific states. Different versions of the solicitation letter were sent under the letterhead "Office of the Vice President" and used varying combinations of the referenced states. The contributors sent checks to the NRSC that designated the NRSC as payee. The complaint alleges that these contributions did not name any Republican Senate candidates or direct the NRSC to forward all or any portion of the contributions to such candidates.

The complaint states that the NRSC deposited these checks into its own accounts and then sent its own check to specific candidates. The NRSC then reported these contributions as earmarked for the recipient candidates. It further alleges that it appears all or many contributors had not earmarked their contributions as the NRSC reported. It incorporates several newspaper articles which quote a number of contributors who apparently assumed that they had made a contributions to the NRSC and who were apparently surprised that their contributions were reported as earmarked for specific candidates. Several of these quoted contributors indicated that they did not know of, or were unfamiliar with, the candidates for whom their contributions were reported as earmarked.

On this basis, the complaint argues that the contributors had not, in fact, earmarked these contributions, although the

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NRSC had reported them as earmarked. It posits that the NRSC's solicitations merely announced to solicitees its plans to make contributions to certain candidates and its intention to split contributions received from solicitees equally among candidates unless instructed to do otherwise. Thus, the complaint concludes that the NRSC was not acting as a conduit for earmarked contributions, but was instead contributing its own funds to the candidates.

(2) Direction or Control

With regard to the second theory, the complaint alternatively contends that even if the contributions are viewed as earmarked by the contributor, the NRSC has exercised both direction and control over the choice of the recipient candidates. The complaint draws a distinction between those instances involving the passing of contributor checks to the candidates, such as that addressed in Advisory Opinion 1980-46 and MUR 1028 (Council for a Livable World), where the Commission declined to attribute such contributions to the conduit or intermediary and the present instance involving the passing of the conduit's own checks to the candidates. The complaint alleges that since the NRSC received individual contributor checks, made payable to the NRSC, it had the exclusive power to direct the funds to candidates. The complaint argues that the "NRSC determined when, to whom, and in what amount the contributions would be directed to the candidates."

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The complaint further contends that the NRSC's overall scheme indicates its direction of the contributions to candidates. It alleges that the NRSC designed its solicitation letters and mailed them in ways to raise the maximum amount of money for use in close Senate races. The complaint includes a tabulation of the amounts received by individual Senate candidates as support for its contention that some candidates received substantially more transfers than others. It concludes that the subject contributions should be attributed to the NRSC's contribution limitation on the basis of the NRSC's having exercised direction or control over the choice of the recipient candidates.

With regard to both theories, the complaint states that since the total amount transferred to individual Republican Senate candidates by the NRSC exceeded $17,500 each, the NRSC has made contributions to these candidates in excess of the limitation of 2 U.S.C. § 441a(h).2/

B. Respondents' Submissions

The respondents submitted a discussion of the complaint's allegations, an affidavit from the NRSC's comptroller and

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2/ The complaint also notes that if contributors were unaware that they were being reported as having made contributions to particular candidates, it is conceivable that the NRSC's program could have resulted in some contributors' making excessive contributions to the same candidates. The complaint, however, makes no allegation regarding violations of the contribution limitation of 2 U.S.C. § 441a(a)(1)(A) by any specific contributors.

director of administration, a sample copy of a solicitation letter and reply form, and excerpts from the NRSC's reports filed with the Commission.

The NRSC states that it has "developed a large group of reliable supporters with whom it communicates periodically by mail." It determined that it could further its party goals "by calling attention to critical races and facilitating contributor support for Republican candidates by offering to serve as a conduit." The NRSC submitted an example of a September 2, 1986, mailing to its donor base under the letterhead "Office of the Vice President" and signed by George Bush. The letter refers to "[o]ur Republican Senate candidates in South Dakota, Nevada, Louisiana, and California" and described their need for "an immediate contribution." It states that "if each of these four candidates don't [sic] raise at least $236,500 in the next 21 days -- they'll lose." It asks the recipient "to rush me your check for $25 by return mail today." The letter further states:

> To expedite the distribution of your contribution, the Republican Presidential Task Force has agreed to serve as the central clearing house.
>
> If you'll write out your $25 check directly to the Task Force, they'll see to it that every penny of your generous contribution is evenly split and immediately delivered to each of these four candidates.

In a postscript, the letter makes a second reference to "our Republican Senate candidates in South Dakota, Nevada, Louisiana, and California." The response states that "[t]he four campaigns

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discussed varied slightly from letter to letter, but each letter mentioned four specific state campaigns in need of help."

The letter was accompanied by a return envelope and a reply form, both addressed to Vice President George Bush. The reply form stated:

> I understand that our Senate campaigns in South Dakota, Nevada, Louisiana, and California need immediate financial assistance to win this November. To make sure our candidates have the funds they need, I'm enclosing the most generous contribution I can to be split equally among them. Enclosed please find my special candidate check for:
>
> ( ) $40 ( ) $25 ( ) $___Other

The reply form also contained a place for the contributor to put his or her name. It requested that checks be made payable to the Republican Presidential Task Force. It included a disclaimer that stated "Paid for and authorized by the National Republican Senatorial Committee."

The response states that the NRSC had established a discrete function bank account to receive these contributions and to make payments to the Senate campaigns.3/ It adds that unless a check

3/ Presumably, this discrete function bank account was established by the NRSC under the name "Republican Presidential Task Force," since the solicitations asked that checks be made payable to the "task force." The facts, however, are not clear on this point.

A further question may also arise whether the separate bank account should have been treated as another NRSC account or as another political committee (although one affiliated with the NRSC). The September 2 letter states that the task force has (Footnote 3 continued)

2 0 0 4 0 7 3 2 4 9 3

was accompanied by the reply form, the NRSC did not deposit the check into this conduit account. It states that the monies in this account were not commingled with other NRSC funds. The NRSC further states that check deposits were made as quickly as possible and that payments to the Senate campaigns were made within 10 days and in most cases within 48 hours.

The NRSC states that it reported the receipt and transmittal of these contributions on its reports filed with the Commission and that it forwarded the appropriate information to the campaigns. According to the response, the administrative expenses for the NRSC's activities in soliciting and transmitting these contributions were paid either directly by the recipient campaigns (which were billed on a monthly basis for their pro rata shares) or as a charge against the NRSC's coordinated party expenditure limitations with respect to those candidates. The NRSC states that the charges were computed on a "per contributor" basis with the actual amount determined by the direct fundraising costs associated with the mailings. The NRSC also states that it sent "thank you" letters to contributors confirming that their contributions had been forwarded according to the reply form.

(Footnote 3 continued)

agreed to serve as a clearing house in a manner that suggests to the reader that it may have been acting as more than merely the name of the payee for contributors' checks or as merely a discrete function bank account. There is also no evidence that the NRSC sought to treat this account as a joint fundraising depository or committee pursuant to 11 C.F.R. 102.17.

The NRSC contends that the complaint is essentially based on newspaper reports and editorial opinions which quote anecdotal sources and, thus, for this reason, warrants a "no reason to believe" finding. It also contends that the complainant's apparent motive in filing this complaint is the elimination of conduit activity altogether and that such a question cannot appropriately be addressed in an enforcement matter. In addition to these assertions, the NRSC also argues that the solicitation of earmarked contributions by conduits has been approved by the Commission and is a constitutionally protected activity. It further posits that such solicitations do not, by themselves, establish direction or control by the NRSC over the choice of the recipient candidates. The NRSC further argues that in soliciting earmarked contributions a conduit need not identify a candidate by name rather than by campaign. It contends that because the NRSC's mailing only concerned Senate races and because there was only one such race and one Republican Senate candidate in any single state, there was no reasonable possibility of donor confusion. Finally, the NRSC argues that Commission regulations specifically recognize that earmarked contributions may pass through the conduit's own account and that the NRSC's asserted compliance with the accounting and reporting requirements of the regulations, in and of itself, insures that a conduit cannot direct or control the contribution. It cites the establishment of a discrete function bank account as an example of how it could not have exercised direction or control over the contributions.

C. Relevant Law

The Federal Election Campaign Act of 1971, as amended ("the Act"), limits to an aggregate of $17,500 the amount of contributions that a Senate campaign committee, such as the NRSC, may make to a candidate for the U.S. Senate in an election cycle. 2 U.S.C. § 441a(h); 11 C.F.R. § 110.2(c). The Act also limits the contributions that individuals may make to Senate candidates to an aggregate of $1,000 per election and to a Senate campaign committee, such as the NRSC, to an aggregate of $20,000 per calendar year. 2 U.S.C. §§ 441a(a)(1)(A) and 441a(a)(1)(B); 11 C.F.R. §§ 110.1(a) and 110.1(b). The Act further provides that any person, which is defined to include a committee, may act as a conduit or intermediary of contributions earmarked for a particular candidate provided that the conduit or intermediary reports the original source and the intended recipient of such earmarked contributions to the Commission and the intended recipient. 2 U.S.C. § 441a(a)(8); 11 C.F.R. § 110.6.

Commission regulations state that "earmarked means a designation, instruction, or encumbrance (including those which are direct or indirect, express or implied, oral or written) which results in all or any part of a contribution or expenditure being made to, or expended on behalf of, a clearly identified candidate or a candidate's authorized committee." 11 C.F.R. § 110.6(b). Commission regulations require a conduit or intermediary to transmit an earmarked contribution to the

intended recipient within 10 days of the conduit's or intermediary's receipt of the contribution. 11 C.F.R. §§ 102.8(a) and (d). The regulations further require that the conduit or intermediary shall report to the Commission and to the intended recipient the identification of contributors, the amount of the contribution, the date received by the conduit, the intended recipient "as designated by the contributor," the date the contribution was passed on to the intended recipient and whether it was passed on in cash, by the contributor's check, or by the conduit's check. 11 C.F.R. § 110.6(c). Contributions which pass through the conduit's account are disclosed, regardless of amount, on schedules of itemized receipts and expenditures filed with the Commission by the conduit and are included in the total receipts and disbursements reported by the conduit. See 11 C.F.R. § 110.6(c)(1)(i).

Commission regulations further provide that a conduit's or intermediary's contribution limits are not affected by passing on earmarked contributions except where the conduit exercises any direction or control over the choice of the recipient candidate. 11 C.F.R. § 110.6(d)(1). The regulations state that if the conduit or intermediary exercises direction or control over the choice of the recipient candidate, the contribution shall be considered a contribution by both the original contributor and the conduit and shall be so reported. 11 C.F.R. § 110.6(d)(2).

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D. Background from NRSC'S Reports

According to reports filed by the NRSC, it has made direct contributions to Republican Senate candidates and coordinated party expenditures on behalf of these Senate candidates and has been a conduit or intermediary for contributions reported as earmarked and passed on in the form of both contributor checks and NRSC checks.4/ The complaint's allegations relate solely to the NRSC's reported activity as a conduit or intermediary for contributions reported as earmarked and passed on in the form of NRSC checks. The complaint makes no allegations with regard to the NRSC's reported activity as a conduit or intermediary for contributions passed on in the form of contributor checks, i.e., checks made payable to the recipient candidate's committee.5/

4/ The NRSC discloses direct contributions to candidates and coordinated party expenditures in the reports of NRSC-Expenditures. During 1986 (through November 24), the NRSC has reported making $323,904.40 in direct contributions to candidates, and its reports for 1985 and 1986 indicate that most if not all of its 34 candidates for the U.S. Senate in 1986 received at least $15,000 in such contributions. It also has reported making $10,011,062.81 in coordinated party expenditures during 1986. Some of these expenditures are identified as the payment of fundraising and solicitation expenses for particular candidates. In addition, NRSC-Contributions has reported the receipt of reimbursements for fundraising expenses from various Republican Senate candidates during 1986.

5/ NRSC-Contributions has disclosed on a separate Schedule A the receipt and transmittal of contributions totaling $3,142,726.70 as contributions passed on in the form of contributor checks through November 24. The amount of these contributions are not included in the totals on the Detailed Summary Page of FEC Form 3X. A preliminary review of these reports indicates that the average amount of a transmitted contributor check was approximately $600 for individuals and $1,000 for political committees.

NRSC-Contributions has reported and itemized the receipt and transmittal of contributions to Republican Senate candidates in the form of NRSC checks beginning in late 1985. Through November 24, 1986, it has disclosed the receipt and transmittal of such contributions totaling $5,107,482.86, of which $125,005 was received and transmitted in 1985. The NRSC's reports indicate that approximately 90 percent of the total amount of these contributions, however, were received and transmitted between Labor Day and Election Day in 1986. All of these contributions, regardless of their amount, were itemized on Schedule A and included in the totals for the appropriate categories on the Detailed Summary Page of FEC Form 3X. A preliminary review of these reports indicates that the average amount of these contributions was approximately $50, although some were as small as $2. The NRSC also itemized each disbursement to the candidates and by memo entry itemized the portion of each contribution included in each disbursement to a particular candidate.6/

Based on the number of pages of contributions itemized as earmarked for particular candidates (more than 25,000) and the average number of entries per page (three to four), it appears that between Labor Day and Election Day in 1986, the NRSC received and transmitted from 75,000 to 100,000 contributions in

6/ Examples of the NRSC's reporting of these contributions is included as Attachment B to the affidavit as part of the NRSC's response. See pages 45-53 of the attachments.

relatively small amounts that it reported as earmarked for Republican Senate candidates and which it passed on to such candidates in the form of NRSC checks. With few exceptions, each of these contributions (regardless of its amount) was reported as earmarked for four Republican Senate candidates in equal, one-fourth portions. It appears that varying combinations of four candidates were reported as the recipient candidates. A preliminary review of these reports suggests that the names of some Senate candidates appear more frequently than others as the recipient candidates, while the names of other Senate candidates appear infrequently or not at all. These reports also indicate that the NRSC transmitted these contributions to the candidates on the same day, or within one or two days, of their reported receipt by the NRSC.

E. Analysis and Recommendations

The complaint in this matter is based on information from the NRSC's reports as well as newspaper articles and information apparently developed by the complainant from these and other sources. The articles incorporated into the complaint were written by different reporters working for separate, respected newspapers in different geographical areas and contain specific factual information as well as direct quotes from numerous and different sources. These circumstances impart some degree of corroboration to the factual statements and quotations in these articles. Also, the description of the NRSC's solicitation

letter in one newspaper article is corroborated by the example included in the NRSC's submission. The complaint also meets the formal and substantive requirements of 11 C.F.R. § 111.4 regarding the sufficiency of a proper complaint. Thus, neither the incorporation of newspaper articles as part of the factual basis of the complaint nor the complainant's imputed subjective motive for filing the complaint provides any basis for dismissing the complaint or finding no reason to believe a violation may have occurred.

The NRSC also argues that its following the accounting and reporting requirements of Commission regulations regarding a conduit's transmittal of earmarked contributions, in effect, precludes a finding that the conduit exercised direction or control over the choice of the recipient candidate. It also posits that there is a "basic rule" that "the conduit can exercise no direction or control over the choice of the intended recipient." Commission regulations set out the reporting requirements that apply to a conduit for earmarked contributions and also specify that if the conduit exercises direction or control over the choice of the recipient candidates, the conduit shall report the contribution as both the conduit's and the original contributors'. See 11 C.F.R. §§ 110.6(c) and (d). Thus, the regulations explicitly recognize that a conduit for earmarked contributions may, in fact, exercise direction or

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control over the choice of the recipient candidates.7/ Accordingly, a conduit's accounting and reporting of contributions as earmarked and as attributable to only the original contributors is but one factor to consider regarding the question of direction or control.

The NRSC also reads the complaint's allegations regarding the NRSC's alleged exercise of direction or control as based on only these facts: (1) that the NRSC solicited earmarked contributions; (2) that the solicitations did not identify candidates by name: and (3) that the contributions passed through the NRSC's accounts. The NRSC contends that these facts do not establish direction or control and that the Commission has never found these facts as so establishing direction or control. The closed enforcement matters and advisory opinions that the NRSC cites for its argument on this point, however, are materially distinguishable from the situation presented in this matter or support a different interpretation.8/

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7/ The Commission has recognized that a conduit's compliance with the reporting and recordkeeping requirements regarding its passing on of earmarked contributions does not foreclose or determine the separate question whether the conduit has exercised direction or control over the choice of the recipient candidates. See, e.g., Advisory Opinions 1981-57 and 1981-21.

8/ In MUR's 335, 491, 1064, 1462, 1501, 1603, and 1868, the factual conclusion was made that the person or political committee was not, in fact, acting as a conduit for earmarked contributions. MUR 377 concerned the earmarking of contributions to a state party committee for the purpose of the party committee's making coordinated party expenditures on behalf of a candidate. In MUR 1019, the factual conclusion was made that a (Footnote 8 continued)

Moreover, the complaint should not be read as based solely on the above facts but instead as resting on all the relevant facts relating to the entire process and context of the NRSC's activities regarding the subject contributions of which the above three facts are but part of a larger whole. Furthermore, the central issues in this matter, i.e., whether the contributors earmarked the contributions or whether the NRSC exercised direction or control over the choice of the recipient candidates,

(Footnote 8 continued)

city party committee had acted as a collecting agent for contributions to the state party committee.

MUR 446 dealt with the failure of an individual to report as a conduit for an earmarked contribution. In MUR 652, the conclusion was made that the subject committee should amend its reports to reflect its receipt of earmarked contributions. MUR 1005 dealt with the failure to transmit contributions to the recipient committee within the proper time. MUR 1392 dealt, in part, with the failure to report earmarked contributions received by a joint fundraising committee. None of these matters addressed the question of direction or control.

MURs 409 and 427 involved a conduit's solicitation of contributions for a specific Senate candidate and the transmittal of such contributions to the candidate by the conduit's check. Since the Commission determined in MUR 409 that the conduit itself had made an excessive contribution and in MUR 427 that the candidate had accepted an excessive contribution from the conduit, the earmarked contributions were apparently attributed to the conduit for contribution limitation purposes, thus indicating that it had exercised direction or control over the contributions.

MUR 1028 and Advisory Opinion 1980-46 may be distinguished from the situation presented in this matter in that the solicitations by the conduits permitted contributors to make a choice regarding which candidate to contribute to as well as the amount of their contribution and in that the contributors' checks were made payable to the candidate or candidate's committee and did not pass through the conduits' accounts.
(Footnote 8 Continued)

are themselves factual issues necessitating an inquiry into all relevant facts and circumstances.9/ The information submitted in this matter and that reported to the Commission is at the present time insufficient or incomplete to resolve these questions or may suggest that these contributions should have also been attributed to the NRSC.

(1) Earmarking

The information indicates that the NRSC may have intended to solicit earmarked contributions and to treat the contributions received from these solicitations as earmarked to specific candidates. The solicitations stated the contributions would be "evenly split" and "immediately delivered" to four Republican

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(Footnote 8 continued)

Advisory Opinion 1976-51 dealt with the question whether the group of persons was a political committee and did not discuss the question of direction or control over earmarked contributions. Advisory Opinion 1981-57 expressly reserved the question whether the conduit would be exercising direction or control over earmarked contributions that passed through contributor accounts maintained by the conduit in cases where the conduit urged contributors to earmark their contributions for particular candidates. Advisory Opinion 1983-18 dealt with the earmarking of contributions by the original contributor and did not involve any solicitation by either the conduit or the recipients.

The Respondents did not refer to or discuss Advisory Opinions 1986-4 and 1975-10. See pages 20-22 of this report and Footnote 12.

9/ For instance, in Advisory Opinion 1975-74, the Commission noted that all contributions to a multicandidate political committee, such as the NRSC, would be construed as unearmarked in the absence of evidence to the contrary. It further noted that cases where such a committee acts as the conduit for earmarked contributions "will involve varying factual circumstances and will not be susceptible to a neat characterization."

Senate candidates identified by reference to their states, but not by their names. The NRSC posits that such a reference makes such candidates "clearly identified" under the Act and regulations as interpreted by the Commission and, therefore, the contributions were earmarked. Nevertheless, the quoted statements in the newspaper articles suggest that such references may not have, in fact, clearly identified these candidates to recipients of the NRSC's solicitations, who presumably earmarked the contributions.10/

Moreover, it is not known whether or how these solicitations may have been distinguishable by the recipients, the NRSC's donor base, from other solicitations the NRSC may have sent to this donor base in which it solicited contributions on its own behalf or also for use in supporting Republican Senate candidates. It should be noted that the disclaimer on the reply form is the disclaimer the NRSC would normally use on solicitations for contributions to the NRSC. Since the NRSC contends that these

10/ The Act and regulations define "clearly identified" to mean that the name or photograph of the candidate appears or that the identity of the candidate is apparent by unambiguous reference. See 2 U.S.C. § 431(18); 11 C.F.R. § 100.17. There is also authority that a reference to a candidate's status as a candidate, such as "the senatorial candidate of the Republican Party of Georgia," may suffice to make the candidate clearly identified. See, Buckley v. Valeo, 424 U.S. 1, 43 n.51 (1976). In Advisory Opinion 1982-23, the Commission noted that it has permitted a contribution to be earmarked for an undetermined Federal candidate where the facts indicated the candidate was identifiable as to specific office, party affiliation, and election cycle. The references in the NRSC's solicitations may be viewed as presumptively clearly identifying candidates. Nevertheless, the question whether these contributions were in fact earmarked does not turn solely on this point.

subject solicitations were on behalf of candidates, the disclaimer should have also stated that the solicitation was either paid for, or authorized by any candidate, an authorized committee of a candidate, or its agents. It appears that the NRSC's choice of a disclaimer is inconsistent with its contention that it was soliciting earmarked contributions as a conduit. Thus, the information available at this time is not complete or clear regarding whether the subject contributions should be viewed as, in fact, contributions earmarked by the original contributors for specific candidates.

(2) Direction or Control

With regard to the question whether the NRSC exercised direction or control over the choice of the recipient candidates, the information submitted in this matter and that reported to the Commission is also incomplete or tends to suggest that the NRSC may have exercised direction and control. Neither the Act nor the regulations define what is meant by exercising direction or control with respect to earmarked contributions.11/ The Commission has addressed this point in only a few circumstances.

11/ The regulations relating to the exercising of direction or control derive from the legislative history for the predecessor to Section 441a(a)(8). This history explains that "if a person exercises any direct or indirect control over the making of a contribution, then such contribution shall count toward the limitation imposed with respect to such person ... but it will not count toward such a person's contribution limitation when it is demonstrated that such person exercised no direct or indirect control over the making of the contribution involved." H.R. Rep. No. 1438, 93d Cong., 2d Sess. 51-52 (1974) (Conference
(Footnote 11 continued)

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In two advisory opinions the Commission considered this question in terms of whether the conduit or the original contributor was determining the recipient of the contribution, its amount, and its timing. In Advisory Opinion 1986-4, the Commission concluded that where a conduit canvassed individuals who had previously indicated a willingness to make a contribution and asked them to make checks payable to the candidate or the candidate's committee in suggested amounts until the desired total contribution was reached, the conduit would be viewed as having exercised direction or control over the contribution for limitation purposes.12/ In Advisory Opinion 1980-46, the Commission concluded that where a conduit sent a mailing advocating the election of several candidates and suggesting the recipient make a contribution to such candidates through the conduit, the totality of the circumstances did not establish the conduit's exercising direction or control over the contribution.

(Footnote 11 continued)

Report), reprinted in FEC, Legislative History of Federal Election Campaign Act Amendments of 1974 at 995-6 (1977). The original section, 18 U.S.C. § 608(b)(6), was reenacted without change by the 1976 Amendments as 2 U.S.C. § 441a(a)(8). See Pub. L. No. 94-283, § 112, 90 Stat. 475, 488 (1976).

12/ In Advisory Opinion 1975-10, a political committee sought to earmark contributions (originally made to the committee) to specific Federal candidates by obtaining consent from the original contributors. The Commission concluded that the committee "would be asserting some control over the earmarking by reason of the fact that it will actively seek to obtain funds for a specific Federal candidate." The Commission said that both the conduit and the original contributor should be regarded as having made the contribution.

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The opinion noted that the solicitation merely suggested a contribution be made and left to the contributor's discretion the decision regarding to which candidates a contribution was made as well as the amount of the contribution and its timing. The opinion specifically noted that an important fact indicating the conduit's lack of control over the contribution was that the contributors made their checks payable to the candidate or the candidate's committee. See also, MUR 1028.

Although there were 34 Republican Senate candidates, each NRSC solicitation referred to only four such candidates and stated that each contribution received would be evenly split among the four candidates. The NRSC apparently used different versions of this solicitation with varying combinations of four candidates who were not identified by name. The solicitation does not inform contributors that they may make contributions to Republican Senate candidates other than those referenced by state or that they may make a different allocation of their contribution among the candidates. Additionally, the reply form does not provide the means for contributors to designate their contribution for other candidates or to make a different allocation among the referenced candidates. Since the sample solicitation letter was dated September 2, it is not known whether it is also representative of the solicitations used by the NRSC for earmarked contributions on behalf of candidates in late 1985 and the first eight months of 1986. The NRSC has

reported all but a few of the contributions it received from these solicitations as earmarked for four specific candidates and as evenly divided among them. Furthermore, the NRSC apparently gained control over these funds since the checks were made payable to the Republican Presidential Task Force and deposited into an account established and controlled by the NRSC. The funds were passed on in the form of the conduit's checks rather than the contributors' checks.13/

All of the above facts indicate that the NRSC may have made the principal decisions regarding the choice of the recipient candidates as well as determining the portion of each contribution to be allocated to each selected candidate and the timing of the contribution to the candidates. It appears that the only decision the NRSC left to the original contributors was the decision whether or not to remit a check to the NRSC under the terms and conditions set out in the solicitation letter and

13/ The NRSC argues that the deposit of these contributions in a discrete function bank account demonstrates that it did not exercise direction or control. Yet, this account itself was apparently set up and controlled by the NRSC. See also Footnote 3.

The NRSC also posits that since Commission regulations permit a conduit to pass on an earmarked contribution in the form of either the conduit's check or the contributor's check, there is no basis for distinguishing between these two methods regarding the question of direction or control. The Commission, however, has previously noted that whether earmarked contributions pass through the conduit's account or by the contributor's check is an important and relevant fact to consider in relation to the other facts regarding this question. See Advisory Opinion 1980-46.

reply form. Also, the amount of the contributions so treated appears to be approximately $5.1 million.

Moreover, although some Senate candidates apparently received substantially more contributions reported by the NRSC as earmarked than other candidates, the facts are presently incomplete regarding whether or how the manner in which this activity was conducted may have had either the purpose or effect of allocating these contributions to selected candidates. It is also not known what information was exchanged between the NRSC and the recipient candidates regarding the establishment, implementation, and operation of this activity or what participation the recipient candidates had in this activity. Furthermore, it is not known if the person who received the subject solicitations also received solicitations for contributions to be passed on to Republican Senate candidates in the form of contributor checks.14/

Assuming these contributions (passed in the form of conduit checks) were earmarked, if it should be determined that the NRSC exercised direction or control over the choice of the recipient candidates, the NRSC should have attributed them to both the NRSC and the original contributors for reporting and limitation purposes. Since the NRSC has reported making contributions of at least $15,000 to most, if not all, Republican Senate candidates, the attribution of these contributions to the NRSC for

14/ The NRSC has also reported the passing on of approximately $3.1 million in earmarked contributions in the form of contributor checks. See Footnote 5.

contribution limitation purposes could result in the NRSC's having made excessive contributions to certain Senate candidates with respect to the 1986 elections.

For these reasons and to develop a more complete set of facts in this matter, the Office of the General Counsel recommends that the Commission find reason to believe the NRSC and Richard G. Nelson, as treasurer, violated 2 U.S.C. §§ 441a(a)(8) and 441a(h) and 11 C.F.R. §§ 110.6(d)(2) and to send the attached questions and requests for information. This Office, however, makes no recommendations at this time regarding the acceptance of excessive contributions by Republican Senate candidates, since such recommendations, if any, can be made only after further factual development in this matter.

F. Disclaimer

The Act and regulations provide that whenever any person, including a political committee, solicits any contribution through any direct mailing, a proper disclaimer shall appear to give the reader adequate notice of the identity of persons who paid for and, where required, who authorized the communication. See 2 U.S.C. § 441d(a); 11 C.F.R. § 110.11(a)(1). The Act and regulations provide that if the solicitation is paid for and authorized by a candidate, an authorized committee of a candidate or its agent, it shall clearly state that the solicitation has been paid for by the authorized political committee. 2 U.S.C. § 441d(a)(1); 11 C.F.R. § 110.11(a)(1)(i). The Act and

regulations further provide that if a solicitation is authorized by a candidate, an authorized committee of a candidate or an agent thereof, but is paid for by any other person, it shall clearly state that it is paid for by such person and is authorized by such candidate, authorized committee or agent. 2 U.S.C. § 441d(a)(2); 11 C.F.R. § 110.11(a)(1)(ii). If a solicitation is made on behalf of a candidate, but is paid for by any other person and is not authorized by a candidate, an authorized committee of a candidate or its agent, it shall so state. 2 U.S.C. § 441d(a)(3); 11 C.F.R. § 110.11(a)(1)(iii).

The reply form submitted by the NRSC as part of the example of its September 2 solicitation included a disclaimer that stated:

> Paid for and authorized by the National Republican Senatorial Committee.

The NRSC states in its response that these solicitations were paid for either directly by the recipient campaigns (which were billed on a monthly basis for their pro rata share) or as a charge against the NRSC's coordinated party expenditure limitations with respect to those candidates. Thus, it appears that these solicitations may have been paid for by the recipient candidates or their committees or, if paid for solely by the NRSC, were authorized by the candidates or their committees.

In those cases where the recipient candidates or committees paid for part or all of the solicitation, the disclaimer should have so stated. See 2 U.S.C. § 441d(a)(1); 11 C.F.R.

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§ 110.11(a)(1)(i). In those cases where the NRSC paid for the solicitation as a charge against its coordinated party expenditure limitation, the disclaimer should have also stated that the solicitations were authorized by the candidates or their committees or their agents, since coordinated expenditures would, by definition, be deemed to be authorized. See 2 U.S.C. § 441d(a)(2); 11 C.F.R. § 110.11(a)(1)(ii); see also 11 C.F.R. § 110.7(b)(4). The disclaimer which appears on the reply form example would be a proper disclaimer only if these solicitations were not on behalf of any candidate or were not paid for by the candidate, such as for a solicitation to the NRSC itself. See 11 C.F.R. § 110.11(a)(1)(iv)(A). Thus, on the basis of the information presently available, it does not appear that the NRSC used a complete or proper disclaimer on the subject solicitations.

Accordingly, the Office of the General Counsel recommends that the Commission find reason to believe that the NRSC and Richard G. Nelson, as treasurer, violated 2 U.S.C. § 441d(a).

RECOMMENDATIONS

1. Find reason to believe the National Republican Senatorial Committee and Richard G. Nelson, as treasurer, violated 2 U.S.C. §§ 441a(a)(8) and 441a(h) and 11 C.F.R. § 110.6(d)(2).

2. Find reason to believe the National Republican Senatorial Committee and Richard G. Nelson, as treasurer, violated 2 U.S.C. § 441d(a).

3. Approve and send the attached letter, General Counsel's Factual and Legal Analysis, and questions and requests for information.

Date 3/27/87

Lawrence M. Noble
Acting General Counsel

Attachments
1. Proposed Letter to Respondents
2. General Counsel's Factual and Legal Analysis
3. Proposed questions and requests for information
4. Respondents' submissions

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FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

MEMORANDUM TO: LAWRENCE M. NOBLE
ACTING GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/JOSHUA MCFADDEN

DATE: MARCH 31, 1987

SUBJECT: OBJECTION TO MUR 2282 - GENERAL COUNSEL'S REPORT SIGNED MARCH 27, 1987

The above-captioned document was circulated to the Commission on Monday, March 30, 1987 at 11:00 A.M.

Objections have been received from the Commissioners as indicated by the name(s) checked:

Commissioner Aikens _____

Commissioner Elliott _____

Commissioner Josefiak _____

Commissioner McDonald _____

Commissioner McGarry X

Commissioner Thomas _____

This matter will be placed on the Executive Session agenda for April 7, 1987.

Please notify us who will represent your Division before the Commission on this matter.

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

MEMORANDUM TO: LAWRENCE M. NOBLE
ACTING GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/JOSHUA MCFADDEN

DATE: APRIL 1, 1987

SUBJECT: OBJECTIONS TO MUR 2282 - GENERAL COUNSEL'S REPORT SIGNED MARCH 27, 1987

The above-captioned document was circulated to the Commission on Monday, March 30, 1987 at 11:00 A.M.

Objections have been received from the Commissioners as indicated by the name(s) checked:

Commissioner Aikens	
Commissioner Elliott	X
Commissioner Josefiak	X
Commissioner McDonald	X
Commissioner McGarry	X
Commissioner Thomas	

This matter will be placed on the Executive Session agenda for April 7, 1987.

Please notify us who will represent your Division before the Commission on this matter.

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
National Republican Senatorial Committee) MUR 2282
and Richard G. Nelson, as Treasurer)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of April 7, 1987, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 2282:

1. Find reason to believe the National Republican Senatorial Committee and Richard G. Nelson, as treasurer, violated 2 U.S.C. § 434(b) and § 441a(h) and 11 C.F.R. § 110.6(d)(2).

2. Find reason to believe the National Republican Senatorial Committee and Richard G. Nelson, as treasurer, violated 2 U.S.C. § 441d(a).

3. Direct the Office of General Counsel to send an appropriate letter, General Counsel's Factual and Legal Analysis, and questions and requests for information.

Commissioners Aikens, Elliott, Josefiak, McDonald, McGarry, and Thomas voted affirmatively for the decision.

Attest:

4-9-87
Date

Marjorie W. Emmons
Marjorie W. Emmons
Secretary of the Commission

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SCC# 9007

BEFORE THE
FEDERAL ELECTION COMMISSION

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
89 APR -7 PM 5:25

IN THE MATTER OF	X	
NATIONAL REPUBLICAN SENATORIAL COMMITTEE	X	MUR 2282
and	X	
FREDERICK W. BASSINGER, AS TREASURER	X	

BRIEF OF RESPONDENTS

Introduction

By letter dated January 28, 1988, the General Counsel of the Federal Election Commission ("the Commission" or "FEC") informed counsel for the respondents that he was prepared to recommend that the Commission find probable cause to believe that respondents hade violated 2 U.S.C. §§ 434(b), 441a(h) and 441d(a), and 11 C.F.R. 110.6(d)(2). The Commission had, on April 7, 1987, found that there was reason to believe that these alleged violations had occurred.

In their Supplemental Memorandum filed on June 2, 1987, and in their earlier papers, respondents have detailed their positions on the issues presented in this Matter Under Review ("MUR"). These positions are not materially altered by the General Counsel's Brief of January 28, 1988, and so we invite the Commission's attention to them. Several matters do require additional explanation, and we address them herein.

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Factual Background

The instant matter under review concerns the role of the National Republican Senatorial Committee ("NRSC") as conduit for certain earmarked contributions to candidates for the United States Senate in the 1986 elections. The complaint and most of the matters raised by the FEC's staff relate in particular to a mailing which occurred on or about September 6, 1986, in which the NRSC solicited various persons to make individual contributions to candidates, using the NRSC as a conduit for the transmission of those contributions.

The particular conduit function with which this MUR is concerned was part of an operation which the NRSC called "Direct To Auto," and which was one of five elements of the NRSC's overall "Direct To" earmarking program undertaken during the 1986 election cycle. The subject mailing, carried out on or about September 2, 1986, involved the sending of 24 variations of a basic letter requesting recommended monetary contributions to four designated senatorial races. Those races were identified by state rather than by candidates' names.

The recipients were requested to make their checks payable to the NRSC or one of its components for subsequent transmittal by the NRSC to the designated campaigns on behalf of the contributor. The reply form accompanying the letter listed the four designated races and reiterated the request for the suggested contribution, or a higher or "other" amount, "to be split equally among" the four campaigns.

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The variations among the letters reflected the selection of four specific campaigns out of a universe of twelve, and the amounts requested reflected the NRSC mailing list from which a donor's name originated and his or her contribution history. 565,239 such letters were mailed, and 43,371 returns were received containing a total of $2,340,664 in earmarked contributions.

The monies received through this program were deposited into an NRSC bank account set up for the discrete purpose of processing donor-directed contributions to candidates.[1] And, consistent with the directions of the contributors, these amounts were promptly transmitted to the respective candidates,[2] who in

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[1] The General Counsel's Brief at 5 n.4 states that a Commission audit of the campaign of a particular Republican candidate for the Senate in 1986 revealed "checks designated 'Majority 86' and 'Trust Account' which bore account numbers different from that of the 'Direct-To Account.'" The General Counsel does go on to conclude that there is "no evidence in hand that contributions received as a result of the Direct-To Auto program were deposited in other than the Direct-To Account." This conclusion is entirely correct, and is determinitive of what respondents felt was a new issue unnecessarily injected into this MUR.

During the pendency of this matter, the FEC's staff made available to counsel copies of the four checks to which the General Counsel apparently referred. Our review of those items confirms that they are in fact unrelated to any matter properly before the Commission at this time. Moreover, the transactions to which they do relate were properly conducted and reported. Thus, it is clear not only that the handling and accounting of contributions earmarked by contributors through the Direct-To Auto program were properly done, but that the treatment of non-"Auto" contributions forwarded to the committee mentioned by the General Counsel was proper as well.

[2] As the General Counsel accurately noted in his Brief at 4, in those instances where a donor neglected to place a mark on the return form for the amount remitted, the NRSC followed the

turn were charged for the cost of the solicitation on a per contribution basis.[3] All transactions were timely performed and reported to the FEC.

The General Counsel's Determinations

Based upon precedents including Buckley v. Valeo, 242 U.S. 1, 43, n.51 (1976), and FEC Advisory Opinion 1982-33, the General Counsel first concludes that the contributors in fact earmarked their contributions to clearly identified candidates in a manner consistent with 11 C.F.R. 110.6(b). This determination is both legally and factually correct.

Seemingly ignoring his initial determination, the General Counsel next concludes that the NRSC improperly exercised direction or control over the amounts received. He bases this conclusion on two factors: 1) the NRSC's solicitation for the campaigns it determined were most in need and, by its determination of the frequency that any one campaign would appear

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donor's intent, reflected by the entire form, and saw to it that the amount was divided equally among the four candidates listed. In those instances where a donor indicated an intention to make his contribution to the NRSC itself, the amount was segregated and so treated and reported. "However, in certain instances involving $108,086, the intention to contribute to the NRSC was not identified, and the checks were treated as earmarked for candidates."

[3] The candidates were no more than generally aware of the NRSC's direct-to activities. Indeed, the candidates or their representatives did no more than acknowledge, through letters of agreement, that they would have the legal responsibility to pay the costs of any solicitation that produced donor-directed contributions through a conduit. We reiterate that no candidate participated in the planning, approval, implementation, or oversight of the NRSC's earmarking activity, or approved or authorized any specific direct-to mailing.

in the mailings, its influence over how much any candidate might receive; and 2) the fact that the checks received were paid to and distributed through an NRSC bank account.

As we shall discuss, these conclusions are inconsistent with the governing statute and regulation, and with Commission precedent and, if adopted, would result in an unconstitutional application of a previously undefined and vague term.

Finally, the General Counsel maintains that the NRSC solicitations should have contained a candidate-specific disclaimer. We continue to believe that such a disclaimer would have been inaccurate, and that the NRSC disclaimer that the solicitations did contain was the appropriate one.

ARGUMENT

I. THE GENERAL COUNSEL IMPROPERLY DEFINES THE TERM "DIRECTION OR CONTROL"

As the General Counsel notes, the Commission's regulations do not define "direction or control" by a conduit. Nor does the General Counsel offer such a definition. Instead, he proposes dividing the term into two separate parts, and applying it irrespective of the indisputable evidence of the conduit's rigid acquiescence to donor intent. This ad hoc determination is erroneous.

Notwithstanding the General Counsel's views, we reiterate that a national political committee such as the NRSC has an absolute right to contact interested persons to inform them of important issues and the races in which those issues are being

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hotly contested, and also to solicit their assistance to candidates through earmarked contributions. The fact that emphasis or selectivity enters the recommendation process, which was geared to the natural and stated role of the NRSC to attempt to keep a Republican majority in the Senate, is the necessary outgrowth of the responsible exercise of that function and is entirely immaterial to a determination of "direction or control" of earmarked contributions.

Indeed, the Commission has so held. See, e.g., MUR 1028, Council for a Livable World; Advisory Opinion 1983-18, Fed. Election Camp. Fin. Guide (CCH) ¶ 5662 (1983); Advisory Opinion 1980-46, Fed. Election Camp. Fin. Guide (CCH) ¶ 5508 (1980); Advisory Opinion 1976-51, Fed. Election Camp. Fin. Guide (CCH) ¶ 5251 (1976). NRSC solicitation, or selectivity in making it, cannot be determinative of the FEC's evaluation of a contributor's decision to earmark.

In Council for a Livable World, in particular, the Commission approved a committee's solicitation of contributions to its designated candidates, and adopted the General Counsel's position that the controlling factor is whether "the individual contributors, not the Council, determine whether or not contributions to candidates will be made." That should be the standard here as well.

The determinative questions thus should be: whether or not the recipient of the mailing could and did make a choice independent of the NRSC; and, the contributor having made such a

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choice, whether the NRSC could countermand it. The General Counsel agrees that the recipients in fact made their own choice to earmark, and the evidence unequivocally demonstrates that once made, the NRSC could do, and did, no more than to process, transmit, document and report the donor-directed contribution.

The mailing at issue was received by more than 500,000 persons. Of that number, slightly more than 43,000 persons -- or about eight and one-half percent -- chose to earmark their contributions to candidates through the NRSC. On other words, more than nine out of every ten persons to have received the mailing either chose to reject or ignore the NRSC's suggestion or, based on the information contained in the mailing and elsewhere, decided to contribute to a candidate or candidates, but without using the NRSC as a conduit.

While the initial suggestions and descriptions of the candidates most in need of individual support properly originated with the NRSC, the determinative "direction" (i.e., the decision to earmark and the execution of that decision by sending the earmarked contribution through the NRSC) was the donor's, and the NRSC could not "control" a donor's making of that decision.

That decision having been made and evidenced, the NRSC could not exercise control by changing it. The fact that a donor might have been influenced in the making of his decision by the NRSC's description of candidate need, or that the number of donors who received the description might have reflected the number of mailings in which a particular race was highlighted, is

immaterial to the question of "direction or control." To hold otherwise would be to contradict the constitutionally-protected associational and speech rights of a national political committee and its members. See Buckley v. Valeo, supra.

The General Counsel's statement (Brief at 17) that

> the solicitation of checks payable to the NRSC and the use of an NRSC account to transmit the contributions . . . in fact placed the contributions under the actual control of the NRSC, whether or not that control was ever exercised by changing the recipients or the amounts to be distributed to each

is equally erroneous. The determinitive question is whether or not the putative conduit countermanded the donor's earmarking intent. If it did not, the fact that the earmarked contribution was made payable to the conduit or passed through the conduit's account is immaterial. In fact, it is specifically permitted.

Given the language of the statute that authorizes earmarking, 2 U.S.C. § 441a(a)(8), and most particularly, the Commission's conduiting regulation, 11 C.F.R. 110.6(c)(1)(i), which mandates certain disclosures if "the contribution passed through the conduit's account," the fact that the NRSC (again, with the contributors' understanding and authorization) processed the contributions through its own bank account is indicative of neither direction nor control, however those words might legally be construed. Contributors are specifically authorized to make earmarked contributions to the order of a conduit's account and such an account may in turn be used to transmit the contribution proceeds to the beneficiary candidate.

II. THE NRSC DISCLAIMER WAS ACCURATE AND LEGALLY SUFFICIENT

The General Counsel concludes that instead of the disclaimer which stated "Paid for and authorized by the National Republican Senatorial Committee," the September 2 mailing should have contained a disclaimer stating that the mailing had been authorized by or paid for by the recipient candidates. We respectfully disagree.

The evidence submitted shows only that the candidates were aware and approved that the NRSC intended generally to solicit earmarked contributions and that, if this effort was successful, certain legal requirements would have to be satisfied by the NRSC and the candidates.

However, the the September 2 mailing was not reviewed by the candidates prior to its dissemination and was not specifically authorized or approved by them. It would have been erroneous so to state. Notwithstanding the fact that the costs of the mailing were ultimately paid for by the candidates to whom the contributions had been directed, it also would have been erroneous to suggest that the mailing was "authorized" on this basis.

The General Counsel's reasoning concerning the NRSC's inability to make independent expenditures misses the mark. At the time the solicitation was made, no expenditure had been made on behalf of any candidate. Because the receipt of an earmarked contribution entirely depended upon the recipient's decision, and because that decision could not be made until the mailing had

been received by the contributor, no authorized, allocable event could have taken place until the NRSC, as conduit, obtained the contributor's instruction and check.

Finally, at the time the mailing was sent, no candidate had paid for it, and the portion of the cost for which any candidate would ultimately be responsible could not be identified or allocated until the responses were received by the NRSC. Theoretically, at least, an individual might have recieved nothing and so would have paid nothing. A disclaimer showing that a candidate had, at the time of the mailing, paid for it or was obligated to pay for it, would have been innacurate.

CONCLUSION

For the reasons stated herein, as well those previously advanced to the Commission, the respondents submit that the Commission should determine that there is no probable cause to believe that the respondents have violated the Act.

Respectfully submitted,

EPSTEIN BECKER & GREEN, P.C.

by: Stuart M. Gerson
STUART M. GERSON

April 7, 1988

Suite 900
1140 19th Street, N.W.
Washington, D.C. 20036
(202) 861-0900

Attorneys for Respondents

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 13, 1987

Stuart M. Gerson, Esquire
Epstein Becker Borsody & Green, P.C.
1140 19th Street, N.W., Suite 900
Washington, D.C. 20036

RE: MUR 2282
National Republican Senatorial Committee;
Richard G. Nelson, as Treasurer

Dear Mr. Gerson:

The Federal Election Commission notified your clients on October 31, 1986, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to your clients at that time.

Upon further review of the allegations contained in the complaint, and information supplied by your clients, the Commission, on April 7, 1987, determined that there is reason to believe that your clients have violated 2 U.S.C. § 434(b) and 441a(h), provisions of the Act, and 11 C.F.R. § 110.6(d)(2) of Commission Regulations. Specifically, it appears that if individual contributors did not, in fact, earmark their contributions to specific Federal candidates, the NRSC may have misreported them as earmarked contributions. Additionally, it appears that if these contributions were so earmarked, the NRSC may have exercised direction and control over the choice of the recipient candidates.

On April 7, 1987, the Federal Election Commission also determined that there is reason to believe your clients violated 2 U.S.C. § 441d(a), a provision of the Act. The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Your client's response to the Commission's initial notification of this complaint did not provide complete information regarding the matter in question. Please submit answers to the enclosed questions within fifteen days of receipt of this letter. Statements should be submitted under oath.

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If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of the General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, requests for pre-probable cause conciliation will not be entered after briefs on probable cause have been mailed to the respondent.

Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of General Counsel is not authorized to give extensions beyond 20 days.

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

If you have any questions, please contact George Rishel, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Scott E. Thomas
Chairman

Enclosures
Procedures
General Counsel's Factual and Legal Analysis

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CCC 3196

SENATOR RUDY BOSCHWITZ
CHAIRMAN

JANN CASTEN
EXECUTIVE DIRECTOR

National Republican Senatorial Committee

April 23, 1987

George Rishel, Esq.
Office of the General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

87 APR 24 P1:33

RE: MUR 2282

Dear Mr. Rishel:

By this letter, the National Republican Senatorial Committee ("NRSC") requests an extension of time in responding to the questions submitted by the Federal Election Commission in the above-captioned matter.

Respones to the questions will require considerable discovery work. In order to be responsive to the questions, NRSC will need more time than the fifteen days allowed in the FEC's letter of April 13, 1987, which was received on April 15, 1987. The meeting we have scheduled with you for Monday April 27, 1987 will enable us to determine how much of an extension will be needed.

We look forward to seeing you Monday.

Sincerely,

Benjamin L. Ginsberg
Legal Counsel

cc: Stuart M. Gerson, Esq.

BY HAND

440 FIRST STREET, N.W ■ SUITE 600 ■ WASHINGTON, D.C. 20001 ■ (202) 347-0202 ■ (202) 224-2351

PAID FOR AND AUTHORIZED BY THE NATIONAL REPUBLICAN SENATORIAL COMMITTEE

STATEMENT OF DESIGNATION OF CO-COUNSEL

MUR 2282

NAME OF CO-COUNSEL: Benjamin L. Ginsberg

ADDRESS: National Republican Senatorial Committee
440 First Street, N.W. Suite 600
Washington, D.C. 20001

TELEPHONE: (202) 347-0202 ext. 404

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

4/23/87
Date

Richard G. Nelson
Richard G. Nelson

RESPONDENT'S NAME _____

ADDRESS: _____

_____

_____

HOME PHONE: _____

BUSINESS PHONE: _____

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GCC # 3224

EPSTEIN BECKER BORSODY & GREEN, P.C.
ATTORNEYS AT LAW
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201 MAIN STREET
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515 EAST PARK AVENUE
TALLAHASSEE, FLORIDA 32301-2524
(904) 681-0596

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April 28, 1987

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
87 APR 28 P12:48

HAND DELIVERED

George Rishel, Esquire
Office of the General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 2282

Dear Mr. Rishel:

As attorney for the National Republican Senatorial Committee ("NRSC") in the above-captioned matter, I hereby request an extension of time, through and including June 1, 1987, within which to respond to the questions and requests for information propounded by the Commission.

As the NRSC noted in Mr. Ginsburg's letter to you of April 23, 1987, initially requesting an extension, and as we discussed yesterday, the NRSC will require substantial time beyond the current April 30 due date in order to gather the information requisite to a complete and satisfactory response.

There are two essential reasons for the NRSC's request. First, the Commission's questions require consultation with the former NRSC senior staff members who conceived and directed the activities at issue in the MUR. These persons, having left the employ of the NRSC, are now in new occupations that allow them little opportunity to meet with the NRSC's counsel who are preparing its response. The requested extension will permit the scheduling and completion of the necessary consultations.

Second, the NRSC's accounting and finance staff, which already has significant reporting obligations, will be required to analyze, extract and summarize voluminous documents in order to assist counsel in responding fully to the Commission herein. The requested extension will assure that these functions are carried out thoroughly and accurately.

For all of the foregoing reasons, the NRSC respectfully requests that the Commission should grant the instant request for an extension to June 1, 1987.

Sincerely,

Stuart M. Gerson

Stuart M. Gerson

SMG:cr

cc: Benjamin L. Ginsburg, Esquire

SENSITIVE

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

87 APR 30 AM 11:45

April 30, 1987

MEMORANDUM

TO: The Commission

FROM: Lawrence M. Noble
Acting General Counsel

SUBJECT: MUR 2282 - Request for Extension of Time

By letters dated April 23 and April 28, 1987, the Respondents requested an extension of 32 days in which to respond to the Commission's findings on April 7, 1987, and its interrogatories and request for documents. Staff of the Office of the General Counsel met with counsel and co-counsel for the Respondents on April 27, 1987, regarding the requested information. The letter explains that an extension is necessary in order for counsel to schedule meetings with former employees of the Respondents and for the Respondents' staff to collect the requested data.

The Office of the General Counsel recommends that the Commission grant the requested extension.

RECOMMENDATIONS:

1. Grant an extension of 32 days to the National Republican Senatorial Committee and Richard G. Nelson, as treasurer.

2. Approve the attached letter.

Attachments
1. Requests for Extension of Time
2. Letter to Respondents

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
National Republican Senatorial Committee and Richard G. Nelson, as treasurer	)	MUR 2282

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on May 4, 1987, the Commission decided by a vote of 5-0 to take the following actions in MUR 2282:

1. Grant an extension of 32 days to the National Republican Senatorial Committee and Richard G. Nelson, as treasurer, as recommended in the General Counsel's Memorandum to the Commission dated April 30, 1987.

2. Approve the letter, as recommended in the General Counsel's Memorandum to the Commission dated April 30, 1987.

Commissioners Aikens, Elliott, Josefiak, McDonald, and Thomas voted affirmatively for the decision; Commissioner McGarry did not cast a vote.

Attest:

5-4-87
Date

Marjorie W. Emmons
Secretary of the Commission

Received in the Office of Commission Secretary: Thurs., 4-30-87, 11:45
Circulated on 48 hour tally basis: Thurs., 4-30-87, 4:00
Deadline for vote: Mon., 5-04-87, 4:00

/jm/

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 6, 1987

Stuart M. Gerson, Esquire
Epstein Becker Borsody & Green, P.C.
1140 19th Street, N.W.
Washington, D. C. 20036

RE: MUR 2282
National Republican
Senatorial Committee and
Richard G. Nelson, as
treasurer

Dear Mr. Gerson:

This is in response to your letters dated April 23 and 28, 1987, requesting an extension of 32 days until June 1, 1987 to respond to the Commission's findings on April 7, 1987, and its interrogatories and request for documents. After considering the circumstances presented in your letter, the Federal Election Commission has granted the requested extension. Accordingly, your response is due by close of business on June 1, 1987.

If you have any questions, please contact George F. Rishel, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
Acting General Counsel

cc: Benjamin L. Ginsberg, Esquire
National Republican Senatorial Committee
440 First Street, N. W., Suite 600
Washington, D. C. 20001

2024073256

EPSTEIN BECKER BORSODY & GREEN, P.C.
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SIX LANDMARK SQUARE
STAMFORD, CONNECTICUT 06901-2704
(203) 348-3737

*D.C. NEW YORK, WASHINGTON, D.C.
CONNECTICUT AND VIRGINIA ONLY

RECEIVED AT THE FEC
GCC# 3522
87 JUN 2 A10:25

June 1, 1987

87 JUN 2 P3:01
RECEIVED
GENERAL COUNSEL'S OFFICE

HAND DELIVERED

Ms. Marjorie W. Emmons
Secretary
Federal Election Commission
999 E Street, N.W.
9th Floor
Washington, D.C. 20463

Re: MUR 2282

Dear Ms. Emmons:

Enclosed for filing in MUR 2282 are: (1) respondents' Responses to Questions and Requests for Information and the attachments thereto; and (2) respondents' Supplemental Memorandum addressing certain legal issues raised in Chairman Thomas' April 13, 1987 letter to me in this matter.

Thank you for your assistance.

Sincerely,

Stuart Gerson

Stuart M. Gerson
Attorney for Respondents

SMG:cr

Enclosures

cc: George Rishel, Esquire

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RECEIVED BY THE FEC
87 JUN 2 AM 10:25

FEDERAL ELECTION COMMISSION

87 JUN 2 P3:01

In the Matter of)
MUR 2282)
)
National Republican Senatorial Committee,)
Richard G. Nelson, as Treasurer,)
Respondents.)

RESPONSES TO QUESTIONS AND REQUESTS FOR INFORMATION

The National Republican Senatorial Committee ("NRSC") and its Treasurer, the respondents herein, by their attorneys, respectfully respond to the Questions and Requests for Information that the Federal Election Commission ("FEC" or "Commission") has propounded in this matter.

We note in so replying that counsel for the respondents and the Commission have consulted with each other in order to clarify and narrow the scope of these questions and requests. The parties' agreements in this regard are reflected specifically in the individual answers that follow:

1. Identify and list all individuals whether or not employed by the NRSC, who had supervisory or policy making responsibility for planning, approving, implementing, or operating the NRSC's earmarking activity and describe in detail the nature, scope, and dates of their role in this activity.

RESPONSE:

(a) Rodney A. Smith is a consultant as to political fundraising and management and can be contacted in care of the office of the undersigned counsel, Epstein Becker Borsody & Green, P.C., 1140 19th Street, N.W., Washington, D.C. 20036,

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861-0900. Mr. Smith was the Finance Director and Treasurer of the NRSC during the period at issue and had overall responsibility for the planning, approving, implementing and operating of the NRSC's fundraising activities relating to earmarking by contributors.

(b) Maryanne E. Preztunik is the Comptroller and Director of Administration of the NRSC, 440 First Street, N.W., Washington, D.C. 20001, 347-0202, and was so throughout the 1985-86 election cycle. She was responsible for the formulation of procedures to insure that donor-directed contributions were transferred to candidates in a timely fashion, that such contributions were appropriately accounted for and reported to the FEC, and that the recipients were assessed and paid their pro-rata shares of the costs of the NRSC's conduiting activities. Ms. Preztunik also maintained and supervised the discrete-function bank account that the NRSC used for conduiting purposes.

(c) Thomas C. Griscom is presently Assistant to the President for Communications and Planning, and also can be contacted through the office of the undersigned counsel. He was Executive Director of the NRSC during the period at issue, and participated in the development of the NRSC's activities relating to earmarking by contributors. He had final staff supervisory authority over these activities and received reports from subordinates concerning their conduct and results.

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(d) Scott Cottington, a political consultant, 6480 Little Falls Road, Arlington, Virginia 22213, was the NRSC's Political Director during the period at issue and participated in the development of the NRSC's conduiting activities and in their execution insofar as his division provided information concerning political conditions that served as the basis for communications by the NRSC to persons who might have wished to earmark contributions for transmittal by the NRSC to various candidates.

(e) James Kevin Wholey, Esquire, Legislative Director and General Counsel for Senator Alfonse D'Amato, 520 Hart Senate Office Building, Washington, D.C., 224-8358. Mr. Wholey was the NRSC's staff counsel during 1985-86, and he provided legal advice and opinions to the Committee concerning the conduct of earmarking activities. In furtherance of his official responsibilities and on behalf of the NRSC, Mr. Wholey, at times, also sought legal advice from outside counsel.

(f) Stuart M. Gerson, Esquire, Epstein Becker Borsody & Green, P.C., 1140 19th Street, N.W., Washington, D.C. 20036, 861-0900, respondents' counsel herein, also was outside legal counsel to the NRSC during the 1985-86 election cycle. From time to time, at the request of NRSC officials, he provided legal advice and opinions concerning the statutes and regulations governing earmarking and certain NRSC plans and activities related thereto.

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(g) Dina Beaumont is the NRSC's Assistant Comptroller. During the period at issue she also was the director of its contributor direct-to program. She had ministerial responsibilities regarding, inter alia, the execution of mailings and the receipt of responses thereto and the provision of information to various campaigns concerning direct-to matters.

(h) Amy Gilbert, Gilbert & Wolfand, 2201 Wisconsin Avenue, N.W., Washington, D.C. 20007, 342-6000, was accounting consultant to the NRSC and assisted Ms. Preztunik and Ms. Beaumont in the creation of an accounting system and computer program that accurately and completely would describe the NRSC's receipt and timely transmittal to candidates of donor-directed contributions and the timely preparation of reports to the FEC.

(i) Geoff Brown, Bond, Beebe, Barton & Muckelbauer, P.C., 4200 Wisconsin Avenue, N.W., Washington, D.C. 20016, 224-6500, was also an accountant for the NRSC regarding earmarking activities, and functioned in a manner similar to that of Ms. Gilbert. Mr. Brown's firm is responsible for the review and audit of the NRSC's reports and financial statements.

2. With respect to contributions passed on to Republican Senate candidates in the form of conduit checks as part of the NRSC's earmarking activity, please provide the following information:

(a) State how many contributors sent checks made payable to the Republican Presidential Task Force to the NRSC as part of this activity.

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(b) State the total dollar amount the NRSC passed on to each Republican Senate candidate as part of this activity. Please list the date and amount of each transfer to each Republican Senate candidate in 1985 and 1986.

(c) State the total cost of the NRSC's earmarking activity.

(d) State and describe in detail the method used to allocate these costs among Republican Senate candidates and include an example.

(e) For each Republican Senate candidate receiving earmarked funds in the form of NRSC checks:

(1) list the total costs allocated to that candidate;

(2) the portion of such costs paid for by each Republican Senate candidate, if any, including the date and amount of each payment to the NRSC;

(3) and the portion of such costs charged to the NRSC's coordinated party expenditure limitation (2 U.S.C. § 441a(d)(3)), if any, including the date and amount of each such charge and the vendor to whom such payment was made.

RESPONSE:

We preface this response by noting that the Commission and its staff are already aware from the voluminous reports that the NRSC has filed and from the papers that have been generated and discussions that have taken place in connection with the instant matter, that the NRSC had an overall "direct to" or

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"conduiting" program. Through this program, the NRSC solicited its base of previous or potential donors to make earmarked contributions to candidates by directing the NRSC to act as the conduit to transmit those contributions. This Matter Under Review essentially concerns the earmarked contributions generated under one predominant element of that program -- a mailing conducted on or about September 2, 1986. However, in answering specific questions from the FEC, we also include in this response certain information about the program as a whole. As we also describe, the NRSC used one discrete-function bank account for processing all donor-directed contributions that were received through the overall earmarking program.

(a) The total number of contributors who, in response to the mailing of September 2, 1986, sent checks made payable to the Republican Presidential Task Force was 20,665. Please note, as we discuss, in Response 3(a), several of the September 2 mailings also were sent to persons on non-Task-Force lists, requesting that they direct contributions to certain candidates by making checks out to the NRSC itself or to the NRSC's "Inner Circle." The additional number of persons so responding was 22,706.

(b) Subpart (b), which requests information as to transfers in 1985 and 1986, relates back to subpart (a) which requests information concerning direct to contributions sent through checks to the Republican Presidential Task Force as part of the September 2 mailing, which occurred in 1986.

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Although the NRSC's records show, as we have described herein, that the total amount of contributions earmarked by contributors who responded to the September 2 mailings was $2,340,664, the NRSC is currently unable to segregate and display the components of the total as transferred to the recipient candidates. The charts which are attached hereto at Tab A therefore represent the NRSC's compilation of the amounts and dates of the transfers to candidates of all donor-directed contributions that were conduited through the NRSC's discrete-function account following September 2, 1986, including, but not limited to, the contributions earmarked by recipients of the September 2 mailings. The total amounts shown transferred exceed the $2.34 million earmarked through the September 2 mailings by about $491,000.

(c) The total cost that the FEC's staff has informed us it is seeking through this question the total cost of the September 2, 1986 mailings, which was approximately $672,000.

(d) The method used to determine the allocable cost of the September 2 mailing was based upon the actual cost per mailing returned to the NRSC with earmarked contributions, as ultimately determined by projecting the rate of return as to mailing method, and then dividing to represent a given candidate's share of the cost of each multi-contribution check received.

To exemplify the calculation of allocable cost, we note first that the NRSC's actual average costs for the preparation

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and mailing for the September 2 effort were $1.52 per piece of certified mail and $1.02 per piece of first-class mail.

Based upon experience, and intending to err, if at all, on the side of prudence, the NRSC estimated the weight of return per thousand returns at 60 percent for those mailings sent by certified mail and 40 percent for those mailings sent by first-class mail. The multiplication of the estimated weights of return by the average cost per piece, produces a total allocable cost of checks received per thousand of $1,320, as shown in the following chart.

	Estimated Weighted Rate of Return	Average Cost Per Piece	Total Allocable Cost
Estimated Number Mailed Certified Mail (600)	60%	$1.52	$ 912
Estimated Number Mailed 1st Class (400)	40%	$1.02	$ 408
TOTAL CHECKS = 1,000			$1,320

Thus, each check received by the NRSC through a return from the September 2 mailings had a generously-estimated, average direct cost of $1.32. Because each check in fact represented a donor's contribution to four candidates (as shown on the return enclosure that the donors sent), a given recipient candidate's allocable share of each check received which included a contribution for him or her was 33 cents (i.e., $1.32 divided by four), and the candidate was so billed or charged.

(e) A complete tabulation of: (1) the total cost allocated to each candidate; (2) the portion, date and amount of each payment; and (3) the portion, date and amount charged against coordinated party expenditure limits is appended hereto at Tab B. The manner of those charges against coordinated limits reflected the fact that the NRSC was the entity to which the recipient candidates owed their respective portions of the allocable costs.

3. With respect to the NRSC's solicitations concerning its earmarking activity for contributions passed on in the form of conduit checks, please provide the following information.

(a) State how many different versions of the September 2 letter (submitted as part of the NRSC's response to the complaint) did the NRSC use to solicit these contributions. Please provide an example of each version and state how many copies of each version were mailed and the dates of such mailings.

(b) State whether these letters including any other versions were mailed to only persons who had previously contributed to the NRSC. State whether the NRSC sent multiple versions of the September 2 letter to such persons.

RESPONSE:

(a) There were four basic versions of the September 2, 1986 letter, all of which had essentially the same text requesting donors to contribute to four specific senatorial campaigns (out of a universe of 12), but which varied among each other as

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to the four races for which donor-directed contributions were solicited and the amount of the suggested contribution, and the class of mailing. These differences produced 24 variations of the four basic versions.

A copy of each of the 24 variations is appended hereto at Tab C.

The state groups were determined on the basis of the NRSC's belief that potential contributors would most likely be inclined to assist the candidates with earmarked contributions in those races that were the closest. Thus, the four candidate groups were derived from 12 campaigns. The amounts requested reflected what the NRSC thought was reasonable in view of the recipient's contribution history (or a reasoned projection of prospects' likelihood of contributing) which related to the NRSC list from which his or her name was derived. Because most of the recipients were previous donors of relatively small amounts (e.g., the "Task Force" and "Masterfile" recipients) or were prospects ("Non-NRSC"), most of the mailings sought lower level contributions (ranging from $15 to $200).

Each of the versions was mailed on or about September 2, 1986, and the number of each mailed (reflecting the state-groups on the mailing versions provided in the attachments hereto) was as follows:

Mailing	Total Mailed
I. TASK FORCE	
SD, NV, LA, CA	39,537
CO, AL, FL, MO	40,111
VT, NC, SD, NV	39,742
AR, SD, GA, AL	38,932
TOTAL	158,322
II. MASTERFILE	
SD, NV, LA, CA	26,606
CO, AL, FL, MO	27,592
VT, NC, SD, NV	27,720
AR, SD, GA, AL	27,339
TOTAL	109,257
III. NON - NRSC	
SD, NV, LA, CA	84,527
CO, AL, FL, MO	68,729
VT, NC, SD, NV	71,890
AR, SD, GA, AL	63,935
TOTAL	289,081
IV. INNER CIRCLE	
SD, NV, LA, CA	2,158
CO, AL, FL, MO	2,150
VT, NC, SD, NV	2,142
AR, SD, GA, AL	2,107
TOTAL	8,557

(b) Such letters were mailed to persons who had not previously contributed to the NRSC (289,081 pieces were sent to prospects) as well as to those who had. Care was taken to ensure that multiple versions of the letter were not sent out to an individual addressee.

4. With respect to the NRSC's earmarking activity, please provide a copy of each version of any solicitation for the 1986 election that the NRSC sent prior to September 1, 1986, in which it solicited contributions to be passed on to Republican Senate candidates in the form of conduit checks.

RESPONSE:

Copies of all such materials are appended hereto at Tab D.

5. With respect to the Republican Presidential Task Force and the NRSC's discrete function bank account, please provide the following information:

(a) State when, in what name, and with whom the NRSC established a discrete function bank account for use with respect to its earmarking activity.

(b) State who set up this account and whose names were originally on the signature card for this account. Please state whether this account remains open, its present purpose or use, the amount of funds in the account, and identify the person or persons whose names are now on the account's signature card. State also the total deposits into this fund and total withdrawals from it since its opening until 12-31-86.

(c) State whether checks made payable to the Republican Presidential Task Force were deposited into this account.

(d) State whether funds deposited into this account came from any source other than individuals who made

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checks payable to the Republican Presidential Task Force. If so, please state the source of such funds, the amounts and dates of their deposit.

(e) State whether disbursements from this account to Republican Senate candidates were made on checks using the name of the NRSC or the Republican Presidential Task Force. Please provide an example of the checks used to disburse funds from this account.

(f) State whether disbursements were made from this account to any person or entity other than Republican Senate candidates. If so, please state the person or entity to whom such transfers were made, the dates and amounts of such transfers, and their purpose.

(g) State whether the NRSC has used the name "Republican Presidential Task Force" during 1985 and 1986 for any purpose other than in connection with its earmarking activity. If so, please describe such other uses and their dates.

RESPONSE:

(a) The discrete-function account was opened on September 30, 1985, in the name of the National Republican Senatorial Committee - Direct To Program, with the Bank of Virginia.

(b) The account was set up by the NRSC's Comptroller, Ms. Preztunik, and, in addition to hers, the original names on the signature card for the account were those of Mr. Griscom, Mr.

Cottington and Kevin Talley, who was then a deputy to the Chairman.

The account remains open at the time of this response to await clearance of a single outstanding check.

The current book balance in the account is $388.17, and the persons whose names are now on the signature card are Ms. Preztunik and Jann L. Olsten, the NRSC's current Executive Director.

From the time of the opening of the account until December 31, 1986, the total deposits into the discrete-function account were $5,552,885.79, and the total amounts drawn from it were as follows:

$4,156,196.42	Donor-directed contributions to candidates from all programs
25,595.62	Insufficient funds checks returned
436.72	Bank service charges
1,370,443.72	Funds transferred to NRSC's own accounts where donor's direction and control over contribution could not be maintained or established.
223.31	Difference

(Note: book balance is $388.17; the discrepancy of $164.86, we believe, represents unaccounted for bank service charges.)

(c) Yes, but only in regard to earmarking activities.

(d) In consultation with the Commission's staff, we were informed that the NRSC was not being asked to provide an

item-by-item accounting of every direct-to transaction involving the NRSC. The staff suggested that the focus of the inquiry was the September 2 mailings and that we could satisfy the inquiry by providing summary data, which we do herein.

As noted in response to Question No. 2, supra, the September 2, 1986 mailings were sent to persons on other lists besides that of the Task Force. Consequently, as the attachments show, receipts from these mailings were also received with checks made payable to the NRSC, and in some cases to the Inner Circle. The amounts received from those mailings, which were deposited as soon as was practicable (and always within 10 days) thereafter, covering the period of September through November, 1986, was as follows:

I.	TASK FORCE	$1,078,502
II.	MASTERFILE	823,105
III.	NON-NRSC	165,877
IV.	INNER CIRCLE	273,180

In addition, as the staff was informed, the NRSC has on other occasions in the 1985-86 cycle solicited and distributed donor-directed contributions to candidates through the NRSC's direct-to account. Those amounts are reflected in the answer to Question 5(b), supra.

(e) Disbursements from the NRSC's discrete-function account of donor-directed contributions to candidates were made on checks denominating the National Republican Senatorial

Committee Direct To Program. An example of such a check is appended hereto at Tab E.

(f) Disbursements from the NRSC's direct-to account were only made payable to candidate's committees or, as noted in subsection (b), supra, to pay bank service charges. Additionally, monies raised from other mailings unrelated to the September 2, 1986 mailings were placed in this account and later transferred to the NRSC's general accounts where donor intent to earmark could not be determined or verified. Additionally, adjustments were made to the account balance in those cases where insufficient funds checks were returned.

(g) The Republican Presidential Task Force is an ongoing group of persons who have supported the NRSC periodically at relatively small levels. The name has been in use since September 1981 in connection with solicitations and informational programs unrelated to earmarking activity.

6. With respect to the example of the reply form submitted with the response to the complaint, please provide the following information:

(a) Please describe in detail how the NRSC dealt with instances in which individuals failed to include the reply form or failed to complete the form when they sent in checks made payable to the Republican Presidential Task Force.

(b) State how many individuals who sent in checks made payable to the Republican Presidential Task Force indicated that their check should be split among Republican Senate candi-

dates other than those referenced on the reply form. State how many indicated that their check should be divided among the referenced candidates in a manner other than that described on the reply form.

(c) Please explain the meaning, purpose, and use of this notation on the example reply form and what use it served:

6J13 00873690

(d) Please provide a copy of each version of the "thank you" letter the NRSC sent to persons who remitted checks made payable to the Republican Presidential Task Force as part of the NRSC's earmarking activity.

RESPONSE:

(a) In regard to those checks received in response to the September 2, 1986 mailing, whether made payable to the Republican Presidential Task Force, the NRSC or the Inner Circle, the NRSC took what it believes to have been reasonable efforts to insure its compliance with all legal and accounting requirements. On those occasions where the return form did not have a mark for the amount remitted, the NRSC followed the donor's intent indicated by the rest of the form and divided the check actually received equally among the four candidates listed.

On a significant number of occasions, the NRSC's staff was able to segregate checks where proper evidence of donor intent to earmark contributions to the NRSC existed, and they were placed in an appropriate NRSC account and were so reported.

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However, despite these good intentions, the NRSC discovered, in connection with the meticulous review of its data and materials that this inquiry by the Commission demanded, that a relatively small number of checks totalling $108,086, a slight percentage of the approximately $2,434,000 received from contributors, were deposited in the direct-to account and were transmitted to candidates as conduited contributions.

(b) All the persons who sent checks payable to the Republican Presidential Task Force responded in the suggested manner as to the candidates referenced. However, of the approximately 158,000 September 2 mailings soliciting donor-earmarked checks to the Task Force, only about 20,500 were received -- a return of less than 12 percent. The return on the Masterfile component of the September 2 mailing was approximately 18 percent; the return on the Non-NRSC component was about seven-tenths of a percent; and the return on the Inner Circle component was less than five percent. The recipients' ability to reject the NRSC's solicitations and suggestions is, therefore, clearly documented.

(c) The four-unit component (e.g., 6J13) is a source code designating the list from which the name was drawn. The eight-unit component (e.g., 00873690) is the NRSC's mailing contractor's computer record number for the individual.

(d) A copy of each version of the requested "thank you" letter is appended hereto at Tab F.

7. With respect to Republican Senate candidates to whom the NRSC passed on funds as part of its earmarking activity, please provide the following information:

(a) State whether any Republican Senate candidate participated in the planning, approval, implementation, operation, or oversight of the NRSC's earmarking activity. If so, please identify such candidates and describe in detail their role concerning this activity.

(b) State whether any Republican Senate candidate authorized, in any manner, the NRSC to solicit contributions on his or her behalf as part of the NRSC's earmarking activities. If so, please identify the Republican Senate candidates who made any such authorizations and the manner in which such authorizations were made.

(c) Please provide copies of any documents transmitted between the NRSC and Republican Senate candidates in 1985 and 1986 regarding the NRSC's earmarking activity with respect to the 1986 Senate elections.

RESPONSE:

(a) No Republican Senate candidate participated in the planning, approval, implementation, or oversight of the NRSC's earmarking activity.

(b) No Republican Senate candidate authorized or approved any specific direct-to mailing by the NRSC, e.g., the September 2, 1986 letters. However, at the end of 1985 and the beginning of 1986, the NRSC, through its field staff, circulated

to each campaign a form entitled "Direct-To Program Agreement." This form was not tied to any specific mailing, but the NRSC anticipated its participation in solicitations for donor-directed contributions and believed it important to inform each campaign of its hope that additional candidate support might be generated through such contributions.

The Agreement went on to describe the legal strictures governing the reporting and accounting of earmarked contributions and the fact that each campaign would be required to pay the cost of raising earmarked monies. The NRSC also discussed the mechanisms that it would employ to assure that these requirements would be satisfied, and requested that each campaign provide acknowledgement in writing of its understanding of the information that the NRSC provided. Copies of the individual authorizations, generally signed by a campaign official, are appended hereto at Tab G.

(c) The Commission's staff has stated that the NRSC need not provide a copy of each transactional document, but could limit itself to copies of the documents that were transmitted to candidates concerning the mechanics and requirements of direct-to activities. Thus, at Tab G, as noted, we have furnished a copy of the forms submitted to the various campaigns describing the rules and procedures governing earmarking. And, at Tab H, we are providing examples of the documents transmitted by the NRSC to campaigns relating to donor-directed contributions conduited through the NRSC.

Dated: June 1, 1987

Respectfully submitted,

EPSTEIN BECKER BORSODY & GREEN, P.C.

By: Stuart M. Gerson
Stuart M. Gerson

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Washington, D.C. 20036
(202) 861-0900

Attorneys for the Respondents

Of Counsel:

Benjamin L. Ginsburg, Esquire
Legal Counsel
National Republican Senatorial Committee
440 First Street, N.W.
Suite 600
Washington, D.C. 20001

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Certification

I, Rodney A. Smith, hereby certify that I was the NRSC's Finance Director and Treasurer during 1985-86, that I have reviewed the foregoing Responses regarding the planning, approving, implementing and operating of the NRSC's fundraising activities relating to earmarking by contributors, and that those Responses are true and correct to the best of my knowledge and belief.

Rodney A. Smith

Rodney A. Smith

Subscribed and sworn to before me this 1ST day of June, 1987.

Karen Brown Arnold

Notary Public

My Commission expires: 1/1/89

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Certification

I, Maryanne E. Preztunik, hereby certify that I was the NRSC's Comptroller and Director of Administration during 1985-86, that I have reviewed the foregoing Responses regarding the accounting and reporting of the NRSC's activities relating to earmarking by contributors and the establishment and operation of the NRSC's direct-to bank account, and that those Responses are true and correct to the best of my knowledge and belief.

Maryanne E. Preztunik

Subscribed and sworn to before me this 1st day of June, 1987.

Karen Brown Arnold
Notary Public

My Commission expires: 1/1/89

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ALABAMA

Jeremiah Denton

CHECK DATE	DOLLARS
09/16/86	$ 2,685.50
09/16/86	$ 100.00
09/16/86	$37,175.76
09/24/86	$42,581.45
09/24/86	$36,121.77
09/24/86	$32,724.25
09/25/86	$13,427.02
09/25/86	$ 2,082.50
09/27/86	$74,556.58
09/29/86	$24,268,59
10/08/86	$24,858.85
10/08/86	$ 294.50
10/14/86	$ 9,514.69
10/14/86	$ 380.00
10/15/86	$ 2,232.50
10/21/86	$ 2,505.25
10/28/86	$ 16.25
10/28/86	$ 2,771.25
10/31/86	$ 1,596.25
11/07/86	$ 1,672.84

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ARKANSAS

Asa Hutchinson

CHECK DATE	DOLLARS
09/16/86	$ 2,052.00
09/16/86	$ 6.25
09/16/86	$19,496.56
09/24/86	$56,622.26
09/25/86	$ 7,237.89
09/27/86	$35,544.67
09/29/86	$10,911.92
10/08/86	$11,803.77
10/08/86	$ 103.75
10/14/86	$ 50.00
10/14/86	$ 4,905.66
10/15/86	$ 769.50
10/21/86	$ 1,302.00
10/28/86	$ 1,379.00
10/28/86	$ 80.00
10/31/86	$ 928.75
11/07/86	$ 764.24

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CALIFORNIA

Ed Zschau

CHECK DATE	DOLLARS
09/16/86	$22,874.50
09/16/86	$ 2,337.50
09/24/86	$58,614.74
09/25/86	$ 9,250.87
09/27/86	$29,558.40
09/29/86	$10,063.51
10/08/86	$ 485.25
10/08/86	$ 9,393.00
10/14/86	$ 1,210.00
10/14/86	$ 3,520.67
10/15/86	$ 480.30
10/21/86	$ 1,185.95
10/28/86	$ 1,841.99
10/28/86	$ 310.00
10/31/86	$ 408.32
11/07/86	$ 434.25

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COLORADO

Kenneth Kramer

CHECK DATE	DOLLARS
09/16/86	$34,872.50
09/16/86	$ 4,776.75
09/24/86	$60,684.29
09/25/86	$12,068.15
09/27/86	$53,382.66
09/29/86	$17,389.85
10/08/86	$19,579.87
10/08/86	$ 222.00
10/14/86	$ 350.00
10/14/86	$ 8,000.56
10/15/86	$ 1,902.50
10/21/86	$ 2,179.25
10/28/86	$ 18.75
10/28/86	$ 2,315.00
10/31/86	$ 2,234.50
11/07/86	$ 1,876.37

FLORIDA

Paula Hawkins

CHECK DATE	DOLLARS
09/16/86	$17,929.31
09/16/86	$ 70.00
09/16/86	$ 2,326.58
09/24/86	$54,805.29
09/25/86	$ 7,746.65
09/27/86	$39,012.00
09/29/86	$13,356.73
10/08/86	$ 660.75
10/08/86	$13,055.12
10/14/86	$ 480.00
10/14/86	$ 4,609.06
10/15/86	$ 1,463.00
10/21/86	$ 1,203.25
10/28/86	$ 1,392.25
10/28/86	$ 6.25
10/31/86	$ 667.50
11/07/86	$ 908.62

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GEORGIA

Mack Mattingly

CHECK DATE	DOLLARS
09/16/86	$19,496.45
09/16/86	$ 60.00
09/16/86	$ 996.75
09/24/86	$56,622.18
09/26/86	$ 7,332.87
09/27/86	$35,544.58
09/29/86	$10,911.86
10/08/86	$11,803.73
10/08/86	$ 223.75
10/14/86	$ 4,905.63
10/15/86	$ 769.50
10/21/86	$ 1,302.00
10/28/86	$ 1,379.00
10/28/86	$ 10.00
10/31/86	$ 928.75
11/07/86	$ 764.22

LOUISIANA

Henson Moore III

CHECK DATE	DOLLARS
09/16/86	$22,874.50
09/16/86	$ 1,324.25
09/24/86	$52,556.49
09/24/86	$ 6,058.25
09/25/86	$ 8,615.87
09/27/86	$39,181.53
09/29/86	$12,746.74
10/08/86	$14,461.75
10/14/86	$ 5,699.50
10/08/86	$ 656.50
10/14/86	$ 327.00
10/15/86	$ 782.00
10/21/86	$ 1,326.25
10/28/86	$ 1,999.50
10/28/86	$ 100.00
10/31/86	$ 1,252.02
11/07/86	$ 577.50

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MISSOURI

Kit Bond

CHECK DATE	DOLLARS
09/16/86	$17,929.34
09/16/86	$ 1,240.00
09/24/86	$54,805.33
09/25/86	$ 7,364.15
09/27/86	$39,946.05
09/29/86	$14,251.96
10/08/86	$13,513.62
10/08/86	$ 190.75
10/14/86	$18,691.25
10/14/86	$ 580.00
10/15/86	$ 3,541.40
10/21/86	$36,158.58
10/28/86	$26,092.52
10/28/86	$ 143.75
10/31/86	$ 4,068.65
11/07/86	$ 2,017.64

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NEVADA

James Santini

CHECK DATE	DOLLARS
09/16/86	$ 49,499.97
09/16/86	$ 2,845.75
09/24/86	$120,376.74
09/25/86	$ 19,554.44
09/27/86	$ 85,531.17
09/29/86	$ 34,331.86
10/08/86	$ 29,733.25
10/08/86	$ 125.25
10/14/86	$ 12,892.71
10/14/86	$ 117.50
10/15/86	$ 2,842.75
10/21/86	$ 3,260.50
10/28/86	$ 5,335.00
10/28/86	$ 163.75
10/31/86	$ 2,913.04
11/07/86	$ 1,667.75

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NORTH CAROLINA

Jim Broyhill

CHECK DATE	DOLLARS
09/16/86	$21,979.47
09/16/86	$ 60.00
09/16/86	$ 1,042.75
09/24/86	$60,401.75
09/25/86	$ 8,142.51
09/28/87	$43,717.23
09/29/86	$20,979.90
10/08/86	$14,601.50
10/08/86	$ 88.75
10/14/86	$ 6,148.19
10/14/86	$ 167.50
10/15/86	$ 1,350.75
10/21/86	$ 1,584.25
10/28/86	$ 2,620.50
10/28/86	$ 18.75
10/31/86	$ 1,582.00
11/07/86	$ 756.25

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SOUTH DAKOTA

James Abdnor

CHECK DATE	DOLLARS
09/16/86	$ 65,177.97
09/16/86	$ 6,596.59
09/24/86	$175,865.67
09/25/86	$ 23,611.25
09/27/86	$120,306.31
09/29/86	$ 44,249.75
10/08/86	$ 229.00
10/08/86	$ 41,296.98
10/14/86	$ 16,823.32
10/14/86	$ 407.50
10/15/86	$ 2,952.25
10/21/86	$ 4,262.50
10/28/86	$ 6,189.00
10/28/86	$ 111.25
10/31/86	$ 3,757.77
11/07/86	$ 2,342.97

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VERMONT

Dick Snelling

CHECK DATE	DOLLARS
09/16/86	$ 3,012.75
09/16/86	$21,979.47
09/24/86	$60,401.75
09/25/86	$ 9,465.84
09/27/86	$44,623.74
09/29/86	$21,848.79
10/08/86	$15,046.51
10/08/86	$ 38.75
10/14/86	$ 6,642.86
10/14/86	$ 47.50
10/15/86	$ 1,403.55
10/21/86	$ 1,778.95
10/28/86	$ 138.75
10/28/86	$ 3,124.74
10/31/86	$ 1,750.30
11/07/86	$ 805.75

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CHARGED ALLOCATIONS AND PAYMENT RELATING TO SEPTEMBER 2 MAILING

(EACH PAYMENT MADE DIRECTLY BY CAMPAIGN UNLESS NOTED)

State/ Candidate	Total Amount Recv'd by NRSC From Campaign	Date of Receipt of Payment	Portion Attributable To Sept 2nd Mailing
Alabama	$ 8,000.00	10/15/86	$ 6,371.31
(Denton)	$ 1,225.98	04/02/87	$ 1,090.98
Arkansas	$ 3,138.96	10/15/86	$ 3,138.96
(Hutchinson)	$ 5,530.23	10/15/86	$ 523.05
California	$86,832.93	10/15/86	$ 2,987.16 (Charge Against Coordinated Exp.)
(Zschau)	$ 500.00	12/12/86	$ 311.19
Colorado	$15,000.00	10/15/86	$ 4,483.38
(Kramer)			
Florida	$ 3,232.68	10/10/86	$ 3,232.68
(Hawkins)	$ 567.93	10/27/86	$ 567.93
Georgia	$ 3,827.19	10/15/86	$ 3,138.96 (Charge Against Coordinated Exp.)
(Mattingly)	$ 523.05	10/20/86	$ 523.05
Louisiana	$23,153.08	10/15/86	$ 3,876.18
(Moore)			
Missouri	$ 3,269.97	10/15/86	$ 3,269.97
(Bond)	$ 1,923.00	11/17/86	$ 1,371.48
Nevada	$ 7,010.52	10/15/86	$ 7,010.52
(Santini)	$ 1,583.37	12/05/86	$ 1,151.37
North Carolina	$ 3,784.53	10/15/86	$ 3,666.30 (Charge Against Coordinated Exp.)
(Broyhill)	$ 2,214.00	12/10/86	$ 590.04
South Dakota	$20,076.23	10/15/86	$10,148.16
(Abdnor)	$ 2,085.30	01/07/87	$ 1,653.30
Vermont	$ 3,703.59	10/15/86	$ 3,703.59
(Snelling)	$ 821.04	01/07/87	$ 623.04

OFFICE OF THE
VICE PRESIDENT
THE HONORABLE GEORGE BUSH

VIA CERTIFIED MAIL

September 2, 1986

Mr. [redacted]

Dear Mr. [redacted]

Our Republican Senate candidates in South Dakota, Nevada, Louisiana, and California are on the verge of running out of money.

And if these candidates don't receive emergency funding fast, they'll be defeated on November 4th.

President Reagan and I have discussed this situation, and we're both very concerned. Because a shift of just 4 seats will give control of the Senate back to the Democrats.

I regret having to use certified mail, but in my political career no letter has ever been more important.

And because you are one of our Party's most dedicated supporters, I felt I had to write to you myself to ask if you'd please send an immediate contribution of $40 today.

With the November elections only 63 days away, we don't have a single moment to spare. For if each of these four candidates don't raise at least $236,500 in the next 21 days -- they'll lose.

It's that simple -- and that frightening!

That's why I'm counting on you to rush me your check for $40 by return mail today.

There is no doubt that 1986 is a pivotal election year. And for you, myself and President Reagan -- the stakes couldn't be higher.

You see, on November 4th the American people will decide whether the Republican Leadership in the U.S. Senate is going to continue working "hand-in-hand" with President Reagan guiding our Nation.

Or whether our adversaries are going to be given the power to pull us off course.

And if these four candidates end up losing on election day

because they ran out of money at this critical "Make or Break" point in their campaigns, then we're almost certainly going to lose President Reagan's precious Republican Majority in the U.S. Senate.

If this happens, you and I will never forgive ourselves if we know in our hearts we hadn't done everything within our power to help these four candidates in this -- their greatest hour of need.

That's why, as Vice President and therefore President of the U.S. Senate, I'm doing everything I can to help each of these four candidates. But I'm only one man. And my efforts alone aren't enough to ensure victory.

The hard reality is this: all four of these fine Republican Senate candidates desperately need your help today.

And your action -- or inaction -- now will quite literally mean political life or death for each of these candidates.

That's why it's absolutely essential that you send in an immediate $40 contribution today.

To expedite the distribution of your contribution, the Republican Presidential Task Force has agreed to serve as the central clearing house.

If you'll write out your $40 check directly to the Task Force, they'll see to it that every penny of your generous contribution is evenly split and immediately delivered to each of these four candidates.

Please, whatever you decide to send, even if it's not $40, I urge you to send it to me without delay.

I'm depending on you Mr. [redacted] And depending on a loyal friend like you to help me solve this crisis is good enough for me.

Sincerely,

George Bush

P.S. I repeat! Without your immediate financial support, our Republican Senate candidates in South Dakota, Nevada, Louisiana, and California are going to lose. And we in turn could lose Republican control of the Senate.

That's why I urge you to send an emergency contribution of $40 today. Thank you!

REPUBLICAN PRESIDENTIAL TASK FORCE

EMERGENCY CANDIDATE SUPPORT REPLY

Dear Vice President Bush,

I understand that our Senate campaigns in South Dakota, Nevada, Louisiana, and California need immediate financial assistance to win this November. To make sure our candidates have the funds they need, I'm enclosing the most generous contribution I can to be split equally among them. Enclosed please find my special candidate check for:

( ) $60 ( ) $40 ( ) $___ Other

Mr. [redacted]

6J05 00935361

PLEASE MAKE YOUR CHECK PAYABLE TO THE REPUBLICAN PRESIDENTIAL TASK FORCE.

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WASHINGTON, D.C. 20013

OFFICE OF THE
VICE PRESIDENT
THE HONORABLE GEORGE BUSH

CERTIFIED MAIL

September 2, 1986

Mrs. [redacted]

Dear Mrs. [redacted]

Our Republican Senate candidates in Colorado, Alabama, Florida, and Missouri are on the verge of running out of money.

And if these candidates don't receive emergency funding fast, they'll be defeated on November 4th.

President Reagan and I have discussed this situation, and we're both very concerned. Because a shift of just 4 seats will give control of the Senate back to the Democrats.

I regret having to use certified mail, but in my political career no letter has ever been more important.

And because you are one of our Party's most dedicated supporters, I felt I had to write to you myself to ask if you'd please send an immediate contribution of $200 today.

With the November elections only 63 days away, we don't have a single moment to spare. For if each of these four candidates don't raise at least $236,500 in the next 21 days -- they'll lose.

It's that simple -- and that frightening!

That's why I'm counting on you to rush me your check for $200 by return mail today.

There is no doubt that 1986 is a pivotal election year. And for you, myself and President Reagan -- the stakes couldn't be higher.

You see, on November 4th the American people will decide whether the Republican Leadership in the U.S. Senate is going to continue working "hand-in-hand" with President Reagan guiding our Nation.

Or whether our adversaries are going to be given the power to pull us off course.

And if these four candidates end up losing on election day

because they ran out of money at this critical "Make or Break" point in their campaigns, then we're almost certainly going to lose President Reagan's precious Republican Majority in the U.S. Senate.

If this happens, you and I will never forgive ourselves if we know in our hearts we hadn't done everything within our power to help these four candidates in this -- their greatest hour of need.

That's why, as Vice President and therefore President of the U.S. Senate, I'm doing everything I can to help each of these four candidates. But I'm only one man. And my efforts alone aren't enough to ensure victory.

The hard reality is this: all four of these fine Republican Senate candidates desperately need your help today.

And your action -- or inaction -- now will quite literally mean political life or death for each of these candidates.

That's why it's absolutely essential that you send in an immediate $200 contribution today.

To expedite the distribution of your contribution, the Republican Presidential Task Force has agreed to serve as the central clearing house.

If you'll write out your $200 check directly to the Task Force, they'll see to it that every penny of your generous contribution is evenly split and immediately delivered to each of these four candidates.

Please, whatever you decide to send, even if it's not $200, I urge you to send it to me without delay.

I'm depending on you Mrs. [redacted]. And depending on a loyal friend like you to help me solve this crisis is good enough for me.

Sincerely,

George Bush

P.S. I repeat! Without your immediate financial support, our Republican Senate candidates in Colorado, Alabama, Florida, and Missouri are going to lose. And we in turn could lose Republican control of the Senate.

That's why I urge you to send an emergency contribution of $200 today. Thank you!

REPUBLICAN PRESIDENTIAL TASK FORCE

EMERGENCY CANDIDATE SUPPORT REPLY

Dear Vice President Bush,

I understand that our Senate campaigns in Colorado, Alabama, Florida, and Missouri need immediate financial assistance to win this November. To make sure our candidates have the funds they need, I'm enclosing the most generous contribution I can to be split equally among them. Enclosed please find my special candidate check for:

( ) $300 ( ) $200 ( ) $___ Other

[redacted]

6J17 00030075

PLEASE MAKE YOUR CHECK PAYABLE TO THE REPUBLICAN PRESIDENTIAL TASK FORCE.

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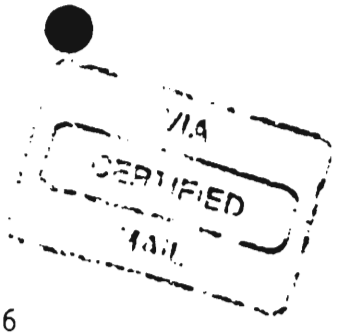
OFFICE OF THE
VICE PRESIDENT
THE HONORABLE GEORGE BUSH



September 2, 1986

Mr. [redacted]

Dear Mr. [redacted]

Our Republican Senate candidates in Vermont, North Carolina, South Dakota, and Nevada are on the verge of running out of money.

And if these candidates don't receive emergency funding fast, they'll be defeated on November 4th.

President Reagan and I have discussed this situation, and we're both very concerned. Because a shift of just 4 seats will give control of the Senate back to the Democrats.

I regret having to use certified mail, but in my political career no letter has ever been more important.

And because you are one of our Party's most dedicated supporters, I felt I had to write to you myself to ask if you'd please send an immediate contribution of $60 today.

With the November elections only 63 days away, we don't have a single moment to spare. For if each of these four candidates don't raise at least $236,500 in the next 21 days -- they'll lose.

It's that simple -- and that frightening!

That's why I'm counting on you to rush me your check for $60 by return mail today.

There is no doubt that 1986 is a pivotal election year. And for you, myself and President Reagan -- the stakes couldn't be higher.

You see, on November 4th the American people will decide whether the Republican Leadership in the U.S. Senate is going to continue working "hand-in-hand" with President Reagan guiding our Nation.

Or whether our adversaries are going to be given the power to pull us off course.

And if these four candidates end up losing on election day

because they ran out of money at this critical "Make or Break" point in their campaigns, then we're almost certainly going to lose President Reagan's precious Republican Majority in the U.S. Senate.

If this happens, you and I will never forgive ourselves if we know in our hearts we hadn't done everything within our power to help these four candidates in this -- their greatest hour of need.

That's why, as Vice President and therefore President of the U.S. Senate, I'm doing everything I can to help each of these four candidates. But I'm only one man. And my efforts alone aren't enough to ensure victory.

The hard reality is this: all four of these fine Republican Senate candidates desperately need your help today.

And your action -- or inaction -- now will quite literally mean political life or death for each of these candidates.

That's why it's absolutely essential that you send in an immediate $60 contribution today.

To expedite the distribution of your contribution, the Republican Presidential Task Force has agreed to serve as the central clearing house.

If you'll write out your $60 check directly to the Task Force, they'll see to it that every penny of your generous contribution is evenly split and immediately delivered to each of these four candidates.

Please, whatever you decide to send, even if it's not $60, I urge you to send it to me without delay.

I'm depending on you Mr. [redacted] And depending on a loyal friend like you to help me solve this crisis is good enough for me.

Sincerely,

George Bush

P.S. I repeat! Without your immediate financial support, our Republican Senate candidates in Vermont, North Carolina, South Dakota, and Nevada are going to lose. And we in turn could lose Republican control of the Senate.

That's why I urge you to send an emergency contribution of $60 today. Thank you!

REPUBLICAN PRESIDENTIAL TASK FORCE

EMERGENCY CANDIDATE SUPPORT REPLY

Dear Vice President Bush,

I understand that our Senate campaigns in Vermont, North Carolina, South Dakota, and Nevada need immediate financial assistance to win this November. To make sure our candidates have the funds they need, I'm enclosing the most generous contribution I can to be split equally among them. Enclosed please find my special candidate check for:

( ) $90 ( ) $60 ( ) $___ Other

Mr. [redacted]

6J35 00936418

PLEASE MAKE YOUR CHECK PAYABLE TO THE REPUBLICAN PRESIDENTIAL TASK FORCE.

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WASHINGTON, D.C. 20013

OFFICE OF THE
VICE PRESIDENT
THE HONORABLE GEORGE BUSH

VIA CERTIFIED MAIL

September 2, 1986

Mr. [redacted]

Dear Mr. Barnett,

Our Republican Senate candidates in Arkansas, South Dakota, Georgia, and Alabama are on the verge of running out of money.

And if these candidates don't receive emergency funding fast, they'll be defeated on November 4th.

President Reagan and I have discussed this situation, and we're both very concerned. Because a shift of just 4 seats will give control of the Senate back to the Democrats.

I regret having to use certified mail, but in my political career no letter has ever been more important.

And because you are one of our Party's most dedicated supporters, I felt I had to write to you myself to ask if you'd please send an immediate contribution of $120 today.

With the November elections only 63 days away, we don't have a single moment to spare. For if each of these four candidates don't raise at least $236,500 in the next 21 days -- they'll lose.

It's that simple -- and that frightening!

That's why I'm counting on you to rush me your check for $120 by return mail today.

There is no doubt that 1986 is a pivotal election year. And for you, myself and President Reagan -- the stakes couldn't be higher.

You see, on November 4th the American people will decide whether the Republican Leadership in the U.S. Senate is going to continue working "hand-in-hand" with President Reagan guiding our Nation.

Or whether our adversaries are going to be given the power to pull us off course.

And if these four candidates end up losing on election day

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because they ran out of money at this critical "Make or Break" point in their campaigns, then we're almost certainly going to lose President Reagan's precious Republican Majority in the U.S. Senate.

If this happens, you and I will never forgive ourselves if we know in our hearts we hadn't done everything within our power to help these four candidates in this -- their greatest hour of need.

That's why, as Vice President and therefore President of the U.S. Senate, I'm doing everything I can to help each of these four candidates. But I'm only one man. And my efforts alone aren't enough to ensure victory.

The hard reality is this: all four of these fine Republican Senate candidates desperately need your help today.

And your action -- or inaction -- now will quite literally mean political life or death for each of these candidates.

That's why it's absolutely essential that you send in an immediate $120 contribution today.

To expedite the distribution of your contribution, the Republican Presidential Task Force has agreed to serve as the central clearing house.

If you'll write out your $120 check directly to the Task Force, they'll see to it that every penny of your generous contribution is evenly split and immediately delivered to each of these four candidates.

Please, whatever you decide to send, even if it's not $120, I urge you to send it to me without delay.

I'm depending on you Mr. [redacted]. And depending on a loyal friend like you to help me solve this crisis is good enough for me.

Sincerely,

George Bush

George Bush

P.S. I repeat! Without your immediate financial support, our Republican Senate candidates in Arkansas, South Dakota, Georgia, and Alabama are going to lose. And we in turn could lose Republican control of the Senate.

That's why I urge you to send an emergency contribution of $120 today. Thank you!

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EMERGENCY CANDIDATE SUPPORT REPLY

Dear Vice President Bush,

I understand that our Senate campaigns in Arkansas, South Dakota, Georgia, and Alabama need immediate financial assistance to win this November. To make sure our candidates have the funds they need, I'm enclosing the most generous contribution I can to be split equally among them. Enclosed please find my special candidate check for:

( ) $180 ( ) $120 ( ) $___ Other

Mr. [redacted]

6J50 00970386

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WASHINGTON, D.C. 20013

OFFICE OF THE
VICE PRESIDENT
THE HONORABLE GEORGE BUSH

September 2, 1986

Mr. [redacted]

Dear Mr. [redacted]

Our Republican Senate candidates in South Dakota, Nevada, Louisiana, and California are on the verge of running out of money.

And if these candidates don't receive emergency funding fast, they'll be defeated on November 4th.

President Reagan and I have discussed this situation, and we're both very concerned. Because a shift of just 4 seats will give control of the Senate back to the Democrats.

I regret having to send this urgent letter, but in my political career no letter has ever been more important.

And because you are one of our Party's most dedicated supporters, I felt I had to write to you myself to ask if you'd please send an immediate contribution of $35 today.

With the November elections only 63 days away, we don't have a single moment to spare. For if each of these four candidates don't raise at least $236,500 in the next 21 days -- they'll lose.

It's that simple -- and that frightening!

That's why I'm counting on you to rush me your check for $35 by return mail today.

There is no doubt that 1986 is a pivotal election year. And for you, myself and President Reagan -- the stakes couldn't be higher.

You see, on November 4th the American people will decide whether the Republican Leadership in the U.S. Senate is going to continue working "hand-in-hand" with President Reagan guiding our Nation.

Or whether our adversaries are going to be given the power to pull us off course.

And if these four candidates end up losing on election day

[redacted]

because they ran out of money at this critical "Make or Break" point in their campaigns, then we're almost certainly going to lose President Reagan's precious Republican Majority in the U.S. Senate.

If this happens, you and I will never forgive ourselves if we know in our hearts we hadn't done everything within our power to help these four candidates in this -- their greatest hour of need.

That's why, as Vice President and therefore President of the U.S. Senate, I'm doing everything I can to help each of these four candidates. But I'm only one man. And my efforts alone aren't enough to ensure victory.

The hard reality is this: all four of these fine Republican Senate candidates desperately need your help today.

And your action -- or inaction -- now will quite literally mean political life or death for each of these candidates.

That's why it's absolutely essential that you send in an immediate $35 contribution today.

To expedite the distribution of your contribution, the National Republican Senatorial Committee (NRSC) has agreed to serve as the central clearing house.

If you'll write out your $35 check directly to the NRSC, they'll see to it that every penny of your generous contribution is evenly split and immediately delivered to each of these four candidates.

Please, whatever you decide to send, even if it's not $35, I urge you to send it to me without delay.

I'm depending on you Mr. [redacted]. And depending on a loyal friend like you to help me solve this crisis is good enough for me.

Sincerely,

George Bush

George Bush

P.S. I repeat! Without your immediate financial support, our Republican Senate candidates in South Dakota, Nevada, Louisiana, and California are going to lose. And we in turn could lose Republican control of the Senate.

That's why I urge you to send an emergency contribution of $35 today. Thank you!

NATIONAL REPUBLICAN SENATORIAL COMMITTEE

EMERGENCY CANDIDATE SUPPORT REPLY

Dear Vice President Bush,

I understand that our Senate campaigns in South Dakota, Nevada, Louisiana, and California need immediate financial assistance to win this November. To make sure our candidates have the funds they need, I'm enclosing the most generous contribution I can to be split equally among them. Enclosed please find my special candidate check for:

( ) $55 ( ) $35 ( ) $___ Other

Mr. [redacted]

L608 00307221

PLEASE MAKE YOUR CHECK PAYABLE TO THE NATIONAL REPUBLICAN SENATORIAL COMMITTEE.

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WASHINGTON, D.C. 20013

OFFICE OF THE
VICE PRESIDENT
THE HONORABLE GEORGE BUSH

September 2, 1986

Mrs. [redacted]

Dear Mrs [redacted]

Our Republican Senate candidates in Colorado, Alabama, Florida, and Missouri are on the verge of running out of money.

And if these candidates don't receive emergency funding fast, they'll be defeated on November 4th.

President Reagan and I have discussed this situation, and we're both very concerned. Because a shift of just 4 seats will give control of the Senate back to the Democrats.

I regret having to send this urgent letter, but in my political career no letter has ever been more important.

And because you are one of our Party's most dedicated supporters, I felt I had to write to you myself to ask if you'd please send an immediate contribution of $100 today.

With the November elections only 63 days away, we don't have a single moment to spare. For if each of these four candidates don't raise at least $236,500 in the next 21 days -- they'll lose.

It's that simple -- and that frightening!

That's why I'm counting on you to rush me your check for $100 by return mail today.

There is no doubt that 1986 is a pivotal election year. And for you, myself and President Reagan -- the stakes couldn't be higher.

You see, on November 4th the American people will decide whether the Republican Leadership in the U.S. Senate is going to continue working "hand-in-hand" with President Reagan guiding our Nation.

Or whether our adversaries are going to be given the power to pull us off course.

And if these four candidates end up losing on election day

because they ran out of money at this critical "Make or Break" point in their campaigns, then we're almost certainly going to lose President Reagan's precious Republican Majority in the U.S. Senate.

If this happens, you and I will never forgive ourselves if we know in our hearts we hadn't done everything within our power to help these four candidates in this -- their greatest hour of need.

That's why, as Vice President and therefore President of the U.S. Senate, I'm doing everything I can to help each of these four candidates. But I'm only one man. And my efforts alone aren't enough to ensure victory.

The hard reality is this: all four of these fine Republican Senate candidates desperately need your help today.

And your action -- or inaction -- now will quite literally mean political life or death for each of these candidates.

That's why it's absolutely essential that you send in an immediate $100 contribution today.

To expedite the distribution of your contribution, the Republican Presidential Task Force has agreed to serve as the central clearing house.

If you'll write out your $100 check directly to the Task Force, they'll see to it that every penny of your generous contribution is evenly split and immediately delivered to each of these four candidates.

Please, whatever you decide to send, even if it's not $100, I urge you to send it to me without delay.

I'm depending on you Mrs. [redacted]. And depending on a loyal friend like you to help me solve this crisis is good enough for me.

Sincerely,

George Bush

P.S. I repeat! Without your immediate financial support, our Republican Senate candidates in Colorado, Alabama, Florida, and Missouri are going to lose. And we in turn could lose Republican control of the Senate.

That's why I urge you to send an emergency contribution of $100 today. Thank you!

REPUBLICAN PRESIDENTIAL TASK FORCE

EMERGENCY CANDIDATE SUPPORT REPLY

URGENT

Dear Vice President Bush,

I understand that our Senate campaigns in Colorado, Alabama, Florida, and Missouri need immediate financial assistance to win this November. To make sure our candidates have the funds they need, I'm enclosing the most generous contribution I can to be split equally among them. Enclosed please find my special candidate check for:

( ) $150 ( ) $100 ( ) $___ Other

Mrs. [redacted]

6J28 00851337

PLEASE MAKE YOUR CHECK PAYABLE TO THE REPUBLICAN PRESIDENTIAL TASK FORCE.

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OFFICE OF THE
VICE PRESIDENT
THE HONORABLE GEORGE BUSH

September 2, 1986

Mr. [redacted]

Dear Mr. [redacted]

Our Republican Senate candidates in Vermont, North Carolina, South Dakota, and Nevada are on the verge of running out of money.

And if these candidates don't receive emergency funding fast, they'll be defeated on November 4th.

President Reagan and I have discussed this situation, and we're both very concerned. Because a shift of just 4 seats will give control of the Senate back to the Democrats.

I regret having to send this urgent letter, but in my political career no letter has ever been more important.

And because you are one of our Party's most dedicated supporters, I felt I had to write to you myself to ask if you'd please send an immediate contribution of $120 today.

With the November elections only 63 days away, we don't have a single moment to spare. For if each of these four candidates don't raise at least $236,500 in the next 21 days -- they'll lose.

It's that simple -- and that frightening!

That's why I'm counting on you to rush me your check for $120 by return mail today.

There is no doubt that 1986 is a pivotal election year. And for you, myself and President Reagan -- the stakes couldn't be higher.

You see, on November 4th the American people will decide whether the Republican Leadership in the U.S. Senate is going to continue working "hand-in-hand" with President Reagan guiding our Nation.

Or whether our adversaries are going to be given the power to pull us off course.

And if these four candidates end up losing on election day

because they ran out of money at this critical "Make or Break" point in their campaigns, then we're almost certainly going to lose President Reagan's precious Republican Majority in the U.S. Senate.

If this happens, you and I will never forgive ourselves if we know in our hearts we hadn't done everything within our power to help these four candidates in this -- their greatest hour of need.

That's why, as Vice President and therefore President of the U.S. Senate, I'm doing everything I can to help each of these four candidates. But I'm only one man. And my efforts alone aren't enough to ensure victory.

The hard reality is this: all four of these fine Republican Senate candidates desperately need your help today.

And your action -- or inaction -- now will quite literally mean political life or death for each of these candidates.

That's why it's absolutely essential that you send in an immediate $120 contribution today.

To expedite the distribution of your contribution, the Republican Presidential Task Force has agreed to serve as the central clearing house.

If you'll write out your $120 check directly to the Task Force, they'll see to it that every penny of your generous contribution is evenly split and immediately delivered to each of these four candidates.

Please, whatever you decide to send, even if it's not $120, I urge you to send it to me without delay.

I'm depending on you [redacted]. And depending on a loyal friend like you to help me solve this crisis is good enough for me.

Sincerely,

George Bush

George Bush

P.S. I repeat! Without your immediate financial support, our Republican Senate candidates in Vermont, North Carolina, South Dakota, and Nevada are going to lose. And we in turn could lose Republican control of the Senate.

That's why I urge you to send an emergency contribution of $120 today. Thank you!

REPUBLICAN PRESIDENTIAL TASK FORCE

EMERGENCY CANDIDATE SUPPORT REPLY

Dear Vice President Bush,

I understand that our Senate campaigns in Vermont, North Carolina, South Dakota, and Nevada need immediate financial assistance to win this November. To make sure our candidates have the funds they need, I'm enclosing the most generous contribution I can to be split equally among them. Enclosed please find my special candidate check for:

( ) $180 ( ) $120 ( ) $___ Other

Mr. [redacted]

6J42 00010696

PLEASE MAKE YOUR CHECK PAYABLE TO THE REPUBLICAN PRESIDENTIAL TASK FORCE.

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440 FIRST STREET, N.W., SUITE 700

P.O. BOX 1121

WASHINGTON, D.C. 20013

OFFICE OF THE
VICE PRESIDENT
THE HONORABLE GEORGE BUSH

September 2, 1986

Mr. [redacted]

Dear Mr. [redacted]

Our Republican Senate candidates in Arkansas, South Dakota, Georgia, and Alabama are on the verge of running out of money.

And if these candidates don't receive emergency funding fast, they'll be defeated on November 4th.

President Reagan and I have discussed this situation, and we're both very concerned. Because a shift of just 4 seats will give control of the Senate back to the Democrats.

I regret having to send this urgent letter, but in my political career no letter has ever been more important.

And because you are one of our Party's most dedicated supporters, I felt I had to write to you myself to ask if you'd please send an immediate contribution of $15 today.

With the November elections only 63 days away, we don't have a single moment to spare. For if each of these four candidates don't raise at least $236,500 in the next 21 days -- they'll lose.

It's that simple -- and that frightening!

That's why I'm counting on you to rush me your check for $15 by return mail today.

There is no doubt that 1986 is a pivotal election year. And for you, myself and President Reagan -- the stakes couldn't be higher.

You see, on November 4th the American people will decide whether the Republican Leadership in the U.S. Senate is going to continue working "hand-in-hand" with President Reagan guiding our Nation.

Or whether our adversaries are going to be given the power to pull us off course.

And if these four candidates end up losing on election day

because they ran out of money at this critical "Make or Break" point in their campaigns, then we're almost certainly going to lose President Reagan's precious Republican Majority in the U.S. Senate.

If this happens, you and I will never forgive ourselves if we know in our hearts we hadn't done everything within our power to help these four candidates in this -- their greatest hour of need.

That's why, as Vice President and therefore President of the U.S. Senate, I'm doing everything I can to help each of these four candidates. But I'm only one man. And my efforts alone aren't enough to ensure victory.

The hard reality is this: all four of these fine Republican Senate candidates desperately need your help today.

And your action -- or inaction -- now will quite literally mean political life or death for each of these candidates.

That's why it's absolutely essential that you send in an immediate $15 contribution today.

To expedite the distribution of your contribution, the Republican Presidential Task Force has agreed to serve as the central clearing house.

If you'll write out your $15 check directly to the Task Force, they'll see to it that every penny of your generous contribution is evenly split and immediately delivered to each of these four candidates.

Please, whatever you decide to send, even if it's not $15, I urge you to send it to me without delay.

I'm depending on you Mr. [redacted] And depending on a loyal friend like you to help me solve this crisis is good enough for me.

Sincerely,

George Bush

P.S. I repeat! Without your immediate financial support, our Republican Senate candidates in Arkansas, South Dakota, Georgia, and Alabama are going to lose. And we in turn could lose Republican control of the Senate.

That's why I urge you to send an emergency contribution of $15 today. Thank you!

REPUBLICAN PRESIDENTIAL TASK FORCE

EMERGENCY CANDIDATE SUPPORT REPLY

URGENT
DEADLINE

Dear Vice President Bush,

I understand that our Senate campaigns in Arkansas, South Dakota, Georgia, and Alabama need immediate financial assistance to win this November. To make sure our candidates have the funds they need, I'm enclosing the most generous contribution I can to be split equally among them. Enclosed please find my special candidate check for:

( ) $30 ( ) $15 ( ) $___ Other

[redacted]

6J56 00832234

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P.O. BOX 1121
WASHINGTON, D.C. 20013

OFFICE OF THE
VICE PRESIDENT
THE HONORABLE GEORGE BUSH

VIA CERTIFIED MAIL

September 2, 1986

Mr. [redacted]

Dear Mr. [redacted]

Our Republican Senate candidates in South Dakota, Nevada, Louisiana, and California are on the verge of running out of money.

And if these candidates don't receive emergency funding fast, they'll be defeated on November 4th.

President Reagan and I have discussed this situation, and we're both very concerned. Because a shift of just 4 seats will give control of the Senate back to the Democrats.

I regret having to use certified mail, but in my political career no letter has ever been more important.

And because you are one of our Party's most dedicated supporters, I felt I had to write to you myself to ask if you'd please send an immediate contribution of $35 today.

With the November elections only 63 days away, we don't have a single moment to spare. For if each of these four candidates don't raise at least $236,500 in the next 21 days -- they'll lose.

It's that simple -- and that frightening!

That's why I'm counting on you to rush me your check for $35 by return mail today.

There is no doubt that 1986 is a pivotal election year. And for you, myself and President Reagan -- the stakes couldn't be higher.

You see, on November 4th the American people will decide whether the Republican Leadership in the U.S. Senate is going to continue working "hand-in-hand" with President Reagan guiding our Nation.

Or whether our adversaries are going to be given the power to pull us off course.

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The hard reality is this: all four of these fine Republican Senate candidates desperately need your help today.

And your action -- or inaction -- now will quite literally mean political life or death for each of these candidates.

That's why it's absolutely essential that you send in an immediate $35 contribution today.

To expedite the distribution of your contribution, the National Republican Senatorial Committee (NRSC) has agreed to serve as the central clearing house.

If you'll write out your $35 check directly to the NRSC, they'll see to it that every penny of your generous contribution is evenly split and immediately delivered to each of these four candidates.

Please, whatever you decide to send, even if it's not $35, I urge you to send it to me without delay.

I'm depending on you Mr. [redacted] And depending on a loyal friend like you to help me solve this crisis is good enough for me.

Sincerely,

George Bush

George Bush

P.S. I repeat! Without your immediate financial support, our Republican Senate candidates in South Dakota, Nevada, Louisiana, and California are going to lose. And we in turn could lose Republican control of the Senate.

That's why I urge you to send an emergency contribution of $35 today. Thank you!

NATIONAL REPUBLICAN SENATORIAL COMMITTEE

EMERGENCY CANDIDATE SUPPORT REPLY

URGENT
DEADLINE

Dear Vice President Bush,

I understand that our Senate campaigns in South Dakota, Nevada, Louisiana, and California need immediate financial assistance to win this November. To make sure our candidates have the funds they need, I'm enclosing the most generous contribution I can to be split equally among them. Enclosed please find my special candidate check for:

( ) $55 ( ) $35 ( ) $___ Other

Mr. [redacted]

L606 00292368

PLEASE MAKE YOUR CHECK PAYABLE TO THE NATIONAL REPUBLICAN SENATORIAL COMMITTEE.

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P.O. BOX 2780

WASHINGTON, D.C. 20013

OFFICE OF THE
VICE PRESIDENT
THE HONORABLE GEORGE BUSH

CERTIFIED

September 2, 1986

Mr. [redacted]

Dear Mr. [redacted]

Our Republican Senate candidates in Colorado, Alabama, Florida, and Missouri are on the verge of running out of money.

And if these candidates don't receive emergency funding fast, they'll be defeated on November 4th.

President Reagan and I have discussed this situation, and we're both very concerned. Because a snift of just 4 seats will give control of the Senate back to the Democrats.

I regret having to use certified mail, but in my political career no letter has ever been more important.

And because you are one of our Party's most dedicated supporters, I felt I had to write to you myself to ask if you'd please send an immediate contribution of $25 today.

With the November elections only 63 days away, we don't have a single moment to spare. For if each of these four candidates don't raise at least $236,500 in the next 21 days -- they'll lose.

It's that simple -- and that frightening!

That's why I'm counting on you to rush me your check for $25 by return mail today.

There is no doubt that 1986 is a pivotal election year. And for you, myself and President Reagan -- the stakes couldn't be higher.

You see, on November 4th the American people will decide whether the Republican Leadership in the U.S. Senate is going to continue working "hand-in-hand" with President Reagan guiding our Nation.

Or whether our adversaries are going to be given the power to pull us off course.

And if these four candidates end up losing on election day

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because they ran out of money at this critical "Make or Break" point in their campaigns, then we're almost certainly going to lose President Reagan's precious Republican Majority in the U.S. Senate.

If this happens, you and I will never forgive ourselves if we know in our hearts we hadn't done everything within our power to help these four candidates in this -- their greatest hour of need.

That's why, as Vice President and therefore President of the U.S. Senate, I'm doing everything I can to help each of these four candidates. But I'm only one man. And my efforts alone aren't enough to ensure victory.

The hard reality is this: all four of these fine Republican Senate candidates desperately need your help today.

And your action -- or inaction -- now will quite literally mean political life or death for each of these candidates.

That's why it's absolutely essential that you send in an immediate $25 contribution today.

To expedite the distribution of your contribution, the National Republican Senatorial Committee (NRSC) has agreed to serve as the central clearing house.

If you'll write out your $25 check directly to the NRSC, they'll see to it that every penny of your generous contribution is evenly split and immediately delivered to each of these four candidates.

Please, whatever you decide to send, even if it's not $25, I urge you to send it to me without delay.

I'm depending on you Mr. [redacted] And depending on a loyal friend like you to help me solve this crisis is good enough for me.

Sincerely,

George Bush

P.S. I repeat! Without your immediate financial support, our Republican Senate candidates in Colorado, Alabama, Florida, and Missouri are going to lose. And we in turn could lose Republican control of the Senate.

That's why I urge you to send an emergency contribution of $25 today. Thank you!

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3 3 0 4 0 7 3 2 6 1 5

NATIONAL REPUBLICAN SENATORIAL COMMITTEE

EMERGENCY CANDIDATE SUPPORT REPLY

Dear Vice President Bush,

DUE: OCTOBER 23rd

I understand that our Senate campaigns in Colorado, Alabama, Florida, and Missouri need immediate financial assistance to win this November. To make sure our candidates have the funds they need, I'm enclosing the most generous contribution I can to be split equally among them. Enclosed please find my special candidate check for:

( ) $40 ( ) $25 ( ) $___ Other

Mr. [redacted]

L620 00923257

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OFFICE OF THE
VICE PRESIDENT
THE HONORABLE GEORGE BUSH

CERTIFIED

September 2, 1986

Mrs. [redacted]

Dear Mrs. [redacted]

Our Republican Senate candidates in Vermont, North Carolina, South Dakota, and Nevada are on the verge of running out of money.

And if these candidates don't receive emergency funding fast, they'll be defeated on November 4th.

President Reagan and I have discussed this situation, and we're both very concerned. Because a shift of just 4 seats will give control of the Senate back to the Democrats.

I regret having to use certified mail, but in my political career no letter has ever been more important.

And because you are one of our Party's most dedicated supporters, I felt I had to write to you myself to ask if you'd please send an immediate contribution of $50 today.

With the November elections only 63 days away, we don't have a single moment to spare. For if each of these four candidates don't raise at least $236,500 in the next 21 days -- they'll lose.

It's that simple -- and that frightening!

That's why I'm counting on you to rush me your check for $50 by return mail today.

There is no doubt that 1986 is a pivotal election year. And for you, myself and President Reagan -- the stakes couldn't be higher.

You see, on November 4th the American people will decide whether the Republican Leadership in the U.S. Senate is going to continue working "hand-in-hand" with President Reagan guiding our Nation.

Or whether our adversaries are going to be given the power to pull us off course.

And if these four candidates end up losing on election day

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because they ran out of money at this critical "Make or Break" point in their campaigns, then we're almost certainly going to lose President Reagan's precious Republican Majority in the U.S. Senate.

If this happens, you and I will never forgive ourselves if we know in our hearts we hadn't done everything within our power to help these four candidates in this -- their greatest hour of need.

That's why, as Vice President and therefore President of the U.S. Senate, I'm doing everything I can to help each of these four candidates. But I'm only one man. And my efforts alone aren't enough to ensure victory.

The hard reality is this: all four of these fine Republican Senate candidates desperately need your help today.

And your action -- or inaction -- now will quite literally mean political life or death for each of these candidates.

That's why it's absolutely essential that you send in an immediate $50 contribution today.

To expedite the distribution of your contribution, the National Republican Senatorial Committee (NRSC) has agreed to serve as the central clearing house.

If you'll write out your $50 check directly to the NRSC, they'll see to it that every penny of your generous contribution is evenly split and immediately delivered to each of these four candidates.

Please, whatever you decide to send, even if it's not $50, I urge you to send it to me without delay.

I'm depending on you Mrs. [redacted] And depending on a loyal friend like you to help me solve this crisis is good enough for me.

Sincerely,

George Bush

George Bush

P.S. I repeat! Without your immediate financial support, our Republican Senate candidates in Vermont, North Carolina, South Dakota, and Nevada are going to lose. And we in turn could lose Republican control of the Senate.

That's why I urge you to send an emergency contribution of $50 today. Thank you!

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NATIONAL REPUBLICAN SENATORIAL COMMITTEE

EMERGENCY CANDIDATE SUPPORT REPLY

Dear Vice President Bush,

I understand that our Senate campaigns in Vermont, North Carolina, South Dakota, and Nevada need immediate financial assistance to win this November. To make sure our candidates have the funds they need, I'm enclosing the most generous contribution I can to be split equally among them. Enclosed please find my special candidate check for:

( ) $75 ( ) $50 ( ) $___ Other

Mrs. [redacted]

L633 00734567

PLEASE MAKE YOUR CHECK PAYABLE TO THE NATIONAL REPUBLICAN SENATORIAL COMMITTEE.

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P.O. BOX 2780

WASHINGTON, D.C. 20013

OFFICE OF THE
VICE PRESIDENT

[redacted]

Mr. [redacted]

Dear Mr. [redacted]

Our Republican Senate candidates in Arkansas, South Dakota, Georgia, and Alabama are on the verge of running out of money.

And if these candidates don't receive emergency funding fast, they'll be defeated on November 4th.

President Reagan and I have discussed this situation, and we're both very concerned. Because a shift of just 4 seats will give control of the Senate back to the Democrats.

I regret having to use certified mail, but in my political career no letter has ever been more important.

And because you are one of our Party's most dedicated supporters, I felt I had to write to you myself to ask if you'd please send an immediate contribution of $120 today.

With the November elections only 63 days away, we don't have a single moment to spare. For if each of these four candidates don't raise at least $236,500 in the next 21 days -- they'll lose.

[redacted] -- [redacted]!

[redacted] by return mail today.

There is no doubt that 1986 is a pivotal election year. And for you, myself and President Reagan -- the stakes couldn't be higher.

You see, on November 4th the American people will decide whether the Republican Leadership in the U.S. Senate is going to continue working "hand-in-hand" with President Reagan guiding our Nation.

Or whether our adversaries are going to be given the power to pull us off course.

And if these four candidates end up losing on election day

because they ran out of money at this critical "Make or Break" point in their campaigns, then we're almost certainly going to lose President Reagan's precious Republican Majority in the U.S. Senate.

If this happens, you and I will never forgive ourselves if we know in our hearts we hadn't done everything within our power to help these four candidates in this -- their greatest hour of need.

That's why, as Vice President and therefore President of the U.S. Senate, I'm doing everything I can to help each of these four candidates. But I'm only one man. And my efforts alone aren't enough to ensure victory.

The hard reality is this: all four of these fine Republican Senate candidates desperately need your help today.

And your action -- or inaction -- now will quite literally mean political life or death for each of these candidates.

That's why it's absolutely essential that you send in an immediate $120 contribution today.

To expedite the distribution of your contribution, the Republican Presidential Task Force has agreed to serve as the central clearing house.

If you'll write out your $120 check directly to the Task Force, they'll see to it that every penny of your generous contribution is evenly split and immediately delivered to each of these four candidates.

Please, whatever you decide to send, even if it's not $120, I urge you to send it to me without delay.

I'm depending on you [redacted]. And depending on a loyal friend like you to help me solve this crisis is good enough for me.

Sincerely,

George Bush

P.S. I repeat! Without your immediate financial support, our Republican Senate candidates in Arkansas, South Dakota, Georgia, and Alabama are going to lose. And we in turn could lose Republican control of the Senate.

That's why I urge you to send an emergency contribution of $120 today. Thank you!

NATIONAL REPUBLICAN SENATORIAL COMMITTEE

EMERGENCY CANDIDATE SUPPORT REPLY

Dear Vice President Bush,

I understand that our Senate campaigns in Arkansas, South Dakota, Georgia, and Alabama need immediate financial assistance to win this November. To make sure our candidates have the funds they need, I'm enclosing the most generous contribution I can to be split equally among them. Enclosed please find my special candidate check for:

( ) $180 ( ) $120 ( ) $___ Other

Mr. [redacted]

6J50 00597905

PLEASE MAKE YOUR CHECK PAYABLE TO THE NATIONAL REPUBLICAN SENATORIAL COMMITTEE.

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P.O. BOX 1121
WASHINGTON, D.C. 20013

OFFICE OF THE
VICE PRESIDENT
THE HONORABLE GEORGE BUSH

VIA CERTIFIED MAIL

September 2, 1986

[redacted]

Our Republican Senate candidates in South Dakota, Arkansas, Georgia, and Alabama. are on the verge of running out of money.

And if these candidates don't receive emergency funding fast, they'll be defeated on November 4th.

President Reagan and I have discussed this situation, and we're both very concerned. Because a shift of just 4 seats will give control of the Senate back to the Democrats.

I regret having to use certified mail, but in my political career no letter has ever been more important.

And because you are one of our Party's most dedicated supporters, I felt I had to write to you myself to ask if you'd please send an immediate contribution of $1,000 today.

With the November elections only 63 days away, we don't have a single moment to spare. For if each of these four candidates don't raise at least $236,500 in the next 21 days -- they'll lose.

It's that simple -- and that frightening!

That's why I'm counting on you to rush me your check for $1,000 by return mail today.

There is no doubt that 1986 is a pivotal election year. And for you, myself and President Reagan -- the stakes couldn't be higher.

You see, on November 4th the American people will decide whether the Republican Leadership in the U.S. Senate is going to continue working "hand-in-hand" with President Reagan guiding our Nation.

Or whether our adversaries are going to be given the power to pull us off course.

And if these four candidates end up losing on election day

because they ran out of money at this critical "Make or Break" point in their campaigns, then we're almost certainly going to lose President Reagan's precious Republican Majority in the U.S. Senate.

If this happens, you and I will never forgive ourselves if we know in our hearts we hadn't done everything within our power to help these four candidates in this -- their greatest hour of need.

That's why, as Vice President and therefore President of the U.S. Senate, I'm doing everything I can to help each of these four candidates. But I'm only one man. And my efforts alone aren't enough to ensure victory.

The hard reality is this: all four of these fine Republican Senate candidates desperately need your help today.

And your action -- or inaction -- now will quite literally mean political life or death for each of these candidates.

That's why it's absolutely essential that you send in an immediate $1,000 contribution today.

To expedite the distribution of your contribution, the Republican Senatorial Inner Circle has agreed to serve as the central clearing house.

If you'll write out your $1,000 check directly to the Inner Circle, they'll see to it that every penny of your generous contribution is evenly split and immediately delivered to each of these four candidates.

Please, whatever you decide to send, even if it's not $1,000, I urge you to send it to me without delay.

I'm depending on you [redacted]. And depending on a loyal friend like you to help me solve this crisis is good enough for me.

Sincerely,

George Bush

P.S. I repeat! Without your immediate financial support, our Republican Senate candidates in South Dakota, Arkansas, Georgia, and Alabama are going to lose. And we in turn could lose Republican control of the Senate.

That's why I urge you to send an emergency contribution of $1,000 today. Thank you!

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REPUBLICAN SENATORIAL INNER CIRCLE

EMERGENCY CANDIDATE SUPPORT REPLY

URGENT
DEADLINE:
SEPTEMBER 23RD

Dear Vice President Bush,

I understand that our Senate campaigns in South Dakota, Arkansas, Georgia, and Alambama. need immediate financial assistance to win this November. To make sure our candidates have the funds they need, I'm enclosing the most generous contribution I can to be split equally among them. Enclosed please find my special candidate check for:

( ) $2,000 ( ) $1,000 ( ) $___ Other

[redacted]

6J82 00660982

PLEASE MAKE YOUR CHECK PAYABLE TO THE REPUBLICAN SENATORIAL INNER CIRCLE.

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WASHINGTON, D.C. 20001

OFFICE OF THE
VICE PRESIDENT
THE HONORABLE GEORGE BUSH

VIA CERTIFIED MAIL

September 2, 1986

[redacted]

Dear [redacted]

Our Republican Senate candidates in South Dakota, Nevada, Louisiana, and California are on the verge of running out of money.

And if these candidates don't receive emergency funding fast, they'll be defeated on November 4th.

President Reagan and I have discussed this situation, and we're both very concerned. Because a shift of just 4 seats will give control of the Senate back to the Democrats.

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Or whether our adversaries are going to be given the power to pull us off course.

And if these four candidates end up losing on election day

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because they ran out of money at this critical "Make or Break" point in their campaigns, then we're almost certainly going to lose President Reagan's precious Republican Majority in the U.S. Senate.

If this happens, you and I will never forgive ourselves if we know in our hearts we hadn't done everything within our power to help these four candidates in this -- their greatest hour of need.

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That's why it's absolutely essential that you send in an immediate $1,000 contribution today.

To expedite the distribution of your contribution, the Republican Senatorial Inner Circle has agreed to serve as the central clearing house.

If you'll write out your $1,000 check directly to the Inner Circle, they'll see to it that every penny of your generous contribution is evenly split and immediately delivered to each of these four candidates.

Please, whatever you decide to send, even if it's not $1,000, I urge you to send it to me without delay.

I'm depending on you [redacted]. And depending on a loyal friend like you to help me solve this crisis is good enough for me.

Sincerely,

George Bush

George Bush

P.S. I repeat! Without your immediate financial support, our Republican Senate candidates in South Dakota, Nevada, Louisiana, and California are going to lose. And we in turn could lose Republican control of the Senate.

That's why I urge you to send an emergency contribution of $1,000 today. Thank you!

8204073230

REPUBLICAN SENATORIAL INNER CIRCLE

EMERGENCY CANDIDATE SUPPORT REPLY

URGENT
DEADLINE:
SEPTEMBER 23RD

Dear Vice President Bush,

I understand that our Senate campaigns in South Dakota, Nevada, Louisiana, and California need immediate financial assistance to win this November. To make sure our candidates have the funds they need, I'm enclosing the most generous contribution I can to be split equally among them. Enclosed please find my special candidate check for:

( ) $2,000 ( ) $1,000 ( ) $___ Other

[redacted]

6J82 00660982

PLEASE MAKE YOUR CHECK PAYABLE TO THE REPUBLICAN SENATORIAL INNER CIRCLE.

440 FIRST STREET, N.W., SUITE 600 ■ WASHINGTON, D.C. 20001

PAID FOR AND AUTHORIZED BY THE NATIONAL REPUBLICAN SENATORIAL COMMITTEE.

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440 FIRST STREET, N.W., SUITE 600
WASHINGTON, D.C. 20001

OFFICE OF THE
VICE PRESIDENT
THE HONORABLE GEORGE BUSH

VIA CERTIFIED MAIL

September 2, 1986

[redacted]

Dear Ms. [redacted]

Our Republican Senate candidates in Colorado, Alabama, Florida, and Missouri are on the verge of running out of money.

And if these candidates don't receive emergency funding fast, they'll be defeated on November 4th.

President Reagan and I have discussed this situation, and we're both very concerned. Because a shift of just 4 seats will give control of the Senate back to the Democrats.

I regret having to use certified mail, but in my political career no letter has ever been more important.

And because you are one of our Party's most dedicated supporters, I felt I had to write to you myself to ask if you'd please send an immediate contribution of $1,000 today.

With the November elections only 63 days away, we don't have a single moment to spare. For if each of these four candidates don't raise at least $236,500 in the next 21 days -- they'll lose.

It's that simple -- and that frightening!

That's why I'm counting on you to rush me your check for $1,000 by return mail today.

There is no doubt that 1986 is a pivotal election year. And for you, myself and President Reagan -- the stakes couldn't be higher.

You see, on November 4th the American people will decide whether the Republican Leadership in the U.S. Senate is going to continue working "hand-in-hand" with President Reagan guiding our Nation.

Or whether our adversaries are going to be given the power to pull us off course.

And if these four candidates end up losing on election day

because they ran out of money at this critical "Make or Break" point in their campaigns, then we're almost certainly going to lose President Reagan's precious Republican Majority in the U.S. Senate.

If this happens, you and I will never forgive ourselves if we know in our hearts we hadn't done everything within our power to help these four candidates in this -- their greatest hour of need.

That's why, as Vice President and therefore President of the U.S. Senate, I'm doing everything I can to help each of these four candidates. But I'm only one man. And my efforts alone aren't enough to ensure victory.

The hard reality is this: all four of these fine Republican Senate candidates desperately need your help today.

And your action -- or inaction -- now will quite literally mean political life or death for each of these candidates.

That's why it's absolutely essential that you send in an immediate $1,000 contribution today.

To expedite the distribution of your contribution, the Republican Senatorial Inner Circle has agreed to serve as the central clearing house.

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Please, whatever you decide to send, even if it's not $1,000, I urge you to send it to me without delay.

I'm depending on you [redacted]. And depending on a loyal friend like you to help me solve this crisis is good enough for me.

Sincerely,

George Bush

George Bush

P.S. I repeat! Without your immediate financial support, our Republican Senate candidates in Colorado, Alabama, Florida, and Missouri are going to lose. And we in turn could lose Republican control of the Senate.

That's why I urge you to send an emergency contribution of $1,000 today. Thank you!

9204073263734

REPUBLICAN SENATORIAL INNER CIRCLE

EMERGENCY CANDIDATE SUPPORT REPLY

URGENT
DEADLINE:
SEPTEMBER 23RD

Dear Vice President Bush,

I understand that our Senate campaigns in Colorado, Alabama Florida and Missouri need immediate financial assistance to win this November. To make sure our candidates have the funds they need I'm enclosing the most generous contribution I can to be split e ually among them. Enclosed please find my special candidate check for:

( ) $2,000 ( ) $1,000 ( ) $___ Other

Ms. [redacted]

6J84 00666095

PLEASE MAKE YOUR CHECK PAYABLE TO THE REPUBLICAN SENATORIAL INNER CIRCLE.

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440 FIRST STREET, N.W., SUITE 600
WASHINGTON, D.C. 20001

OFFICE OF THE
VICE PRESIDENT
THE HONORABLE GEORGE BUSH

VIA CERTIFIED MAIL

September 2, 1986

[redacted]

Dear Mrs. [redacted]

Our Republican Senate candidates in Vermont, North Carolina, South Dakota, and Nevada are on the verge of running out of money.

And if these candidates don't receive emergency funding fast, they'll be defeated on November 4th.

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Or whether our adversaries are going to be given the power to pull us off course.

And if these four candidates end up losing on election day

[redacted]

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Please, whatever you decide to send, even if it's not $1,000, I urge you to send it to me without delay.

I'm depending on you [redacted]. And depending on a loyal friend like you to help me solve this crisis is good enough for me.

Sincerely,

George Bush

P.S. I repeat! Without your immediate financial support, our Republican Senate candidates in Vermont, North Carolina, South Dakota, and Nevada are going to lose. And we in turn could lose Republican control of the Senate.

That's why I urge you to send an emergency contribution of $1,000 today. Thank you!

REPUBLICAN SENATORIAL INNER CIRCLE

EMERGENCY CANDIDATE SUPPORT REPLY

URGENT
DEADLINE

Dear Vice President Bush,

I understand that our Senate campaigns in Vermont, North Carolina, South Dakota, and Nevada need immediate financial assistance to win this November. To make sure our candidates have the funds they need, I'm enclosing the most generous contribution I can to be split equally among them. Enclosed please find my special candidate check for:

( ) $2,000 ( ) $1,000 ( ) $___ Other

Mrs. [redacted]

6J87 00551002

PLEASE MAKE YOUR CHECK PAYABLE TO THE REPUBLICAN SENATORIAL INNER CIRCLE.

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440 FIRST STREET, N.W., SUITE 600
WASHINGTON, D.C. 20001

OFFICE OF THE
VICE PRESIDENT
THE HONORABLE GEORGE BUSH

September 2, 1986

[redacted]

Dear Mr. [redacted]

Our Republican Senate candidates in Colorado, Alabama, Florida, and Missouri are on the verge of running out of money.

And if these candidates don't receive emergency funding fast, they'll be defeated on November 4th.

President Reagan and I have discussed this situation, and we're both very concerned. Because a shift of just 4 seats will give control of the Senate back to the Democrats.

I regret having to send this urgent letter, but in my political career no letter has ever been more important.

And because you are one of our Party's most dedicated supporters, I felt I had to write to you myself to ask if you'd please send an immediate contribution of $100 today.

With the November elections only 63 days away, we don't have a single moment to spare. For if each of these four candidates don't raise at least $236,500 in the next 21 days -- they'll lose.

It's that simple -- and that frightening!

That's why I'm counting on you to rush me your check for $100 by return mail today.

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You see, on November 4th the American people will decide whether the Republican Leadership in the U.S. Senate is going to continue working "hand-in-hand" with President Reagan guiding our Nation.

Or whether our adversaries are going to be given the power to pull us off course.

And if these four candidates end up losing on election day because they ran out of money at this critical "Make or Break" point in their campaigns, then we're almost certainly going to lose

115151

President Reagan's precious Republican Majority in the U.S. Senate.

If this happens, you and I will never forgive ourselves if we know in our hearts we hadn't done everything within our power to help these four candidates in this -- their greatest hour of need.

That's why, as Vice President and therefore President of the U.S. Senate, I'm doing everything I can to help each of these four candidates. But I'm only one man. And my efforts alone aren't enough to insure victory.

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Please, whatever amount you decide to send, even if it's not $100, I urge you to send it to me without delay.

I'm depending on you Mr. [redacted] And depending on a loyal friend like you to help me solve this crisis is good enough for me.

Sincerely,

George Bush

P.S. I repeat! Without your immediate financial support, our Republican Senate candidates in Colorado, Alabama, Florida, and Missouri are going to lose. And we in turn could lose Republican control of the Senate.

That's why I urge you to send an emergency contribution of $100 today. Thank you!

NATIONAL REPUBLICAN SENATORIAL COMMITTEE

EMERGENCY CANDIDATE SUPPORT REPLY

URGENT DEADLINE: SEPTEMBER 23rd

Dear Vice President Bush,

I understand that our Senate campaigns in Colorado, Alabama, Florida, and Missouri need immediate financial assistance to win this November. To make sure our candidates have the funds they need, I'm enclosing the most generous contribution I can to be split equally among them. Enclosed please find my special candidate check for:

( ) $100 ( ) $50 ( )$___ Other

[redacted]

PLEASE MAKE YOUR CHECK PAYABLE TO THE NATIONAL REPUBLICAN SENATORIAL COMMITTEE.

K630 02100258

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% National Republican Senatorial Committee

440 First Street, N.W., Suite 700

P.O. Box 2780

Washington, D.C. 20013

OFFICE OF THE
VICE PRESIDENT
THE HONORABLE GEORGE BUSH

September 2, 1986

Mr. [redacted]

Dear Mr. [redacted]

Our Republican Senate candidates in Vermont, North Carolina, South Dakota, and Nevada are on the verge of running out of money.

And if these candidates don't receive emergency funding fast, they'll be defeated on November 4th.

President Reagan and I have discussed this situation, and we're both very concerned. Because a shift of just 4 seats will give control of the Senate back to the Democrats.

I regret having to send this urgent letter, but in my political career no letter has ever been more important.

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You see, on November 4th the American people will decide whether the Republican Leadership in the U.S. Senate is going to continue working "hand-in-hand" with President Reagan guiding our Nation.

Or whether our adversaries are going to be given the power to pull us off course.

And if these four candidates end up losing on election day because they ran out of money at this critical "Make or Break" point in their campaigns, then we're almost certainly going to lose

8904073264S

President Reagan's precious Republican Majority in the U.S. Senate.

If this happens, you and I will never forgive ourselves if we know in our hearts we hadn't done everything within our power to help these four candidates in this -- their greatest hour of need.

That's why, as Vice President and therefore President of the U.S. Senate, I'm doing everything I can to help each of these four candidates. But I'm only one man. And my efforts alone aren't enough to insure victory.

The hard reality is this: all four of these fine Republican Senate candidates desperately need your help today.

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I'm depending on you Mr. [redacted] And depending on a loyal friend like you to help me solve this crisis is good enough for me.

Sincerely,

George Bush

P.S. I repeat! Without your immediate financial support, our Republican Senate candidates in Vermont, North Carolina, South Dakota, and Nevada are going to lose. And we in turn could lose Republican control of the Senate.

That's why I urge you to send an emergency contribution of $100 today. Thank you!

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NATIONAL REPUBLICAN SENATORIAL COMMITTEE

EMERGENCY CANDIDATE SUPPORT REPLY

[illegible] RECEIVE: [illegible] EMBER 23RD

Dear Vice President Bush,

I understand that our Senate campaigns in Vermont, North Carolina, South Dakota, and Nevada need IMMEDIATE financial assistance to win this November. To make sure our candidates have the funds they need, I'm enclosing the most generous contribution I can to be split equally among them. Enclosed please find my special candidate check for:

( ) $100 ( ) $50 ( ) $ Other

[redacted]

PLEASE MAKE YOUR CHECK PAYABLE TO THE NATIONAL REPUBLICAN SENATORIAL COMMITTEE.

K644 02243111

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440 FIRST STREET, N.W., SUITE 700
P.O. BOX 2780
WASHINGTON, D.C. 20013

OFFICE OF THE
VICE PRESIDENT
THE HONORABLE GEORGE BUSH

September 2, 1986

Mr. [redacted]

Dear Mr. [redacted]

Our Republican Senate candidates in Arkansas, South Dakota, Georgia, and Alabama are on the verge of running out of money.

And if these candidates don't receive emergency funding fast, they'll be defeated on November 4th.

President Reagan and I have discussed this situation, and we're both very concerned. Because a shift of just 4 seats will give control of the Senate back to the Democrats.

I regret having to send this urgent letter, but in my political career no letter has ever been more important.

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Or whether our adversaries are going to be given the power to pull us off course.

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President Reagan's precious Republican Majority in the U.S. Senate.

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I'm depending on you Mr. [redacted] And depending on a loyal friend like you to help me solve this crisis is good enough for me.

Sincerely,

George Bush

P.S. I repeat! Without your immediate financial support, our Republican Senate candidates in Arkansas, South Dakota, Georgia, and Alabama are going to lose. And we in turn could lose Republican control of the Senate.

That's why I urge you to send an emergency contribution of $100 today. Thank you!

NATIONAL REPUBLICAN SENATORIAL COMMITTEE

EMERGENCY CANDIDATE SUPPORT REPLY

URGENT
DEADLINE:
SEPTEMBER [illegible]

Dear Vice President Bush,

I understand that our Senate campaigns in Arkansas, South Dakota, Georgia, and Alabama need immediate financial assistance to win this November. To make sure our candidates have the funds they need, I'm enclosing the most generous contribution I can to be split equally among them. Enclosed please find my special candidate check for:

( ) $100 ( ) $50 ( )$___ Other

Mr. [redacted]

PLEASE MAKE YOUR CHECK PAYABLE TO THE NATIONAL REPUBLICAN SENATORIAL COMMITTEE.

K660 02027523

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440 FIRST STREET, N.W., SUITE 700

P.O. BOX 2780

WASHINGTON, D.C. 20013

OFFICE OF THE
VICE PRESIDENT
THE HONORABLE GEORGE BUSH

September 2, 1986

Mr. [redacted]

Dear Mr. [redacted]

Our Republican Senate candidates in South Dakota, Nevada, Louisiana, and California are on the verge of running out of money.

And if these candidates don't receive emergency funding fast, they'll be defeated on November 4th.

President Reagan and I have discussed this situation, and we're both very concerned. Because a shift of just 4 seats will give control of the Senate back to the Democrats.

I regret having to send this urgent letter, but in my political career no letter has ever been more important.

And because you are one of our Party's most dedicated supporters, I felt I had to write to you myself to ask if you'd please send an immediate contribution of $35 today.

With the November elections only 63 days away, we don't have a single moment to spare. For if each of these four candidates don't raise at least $236,500 in the next 21 days -- they'll lose.

It's that simple -- and that frightening!

That's why I'm counting on you to rush me your check for $35 by return mail today.

There is no doubt that 1986 is a pivotal election year. And for you, myself and President Reagan -- the stakes couldn't be higher.

You see, on November 4th the American people will decide whether the Republican Leadership in the U.S. Senate is going to continue working "hand-in-hand" with President Reagan guiding our Nation.

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If this happens, you and I will never forgive ourselves if we know in our hearts we hadn't done everything within our power to help these four candidates in this -- their greatest hour of need.

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That's why it's absolutely essential that you send in an immediate $35 contribution today.

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If you'll write out your $35 check directly to the NRSC, they'll see to it that every penny of your generous contribution is evenly split and immediately delivered to each of these four candidates.

Please, whatever you decide to send, even if it's not $35, I urge you to send it to me without delay.

I'm depending on you Mr. [redacted] And depending on a loyal friend like you to help me solve this crisis is good enough for me.

Sincerely,

George Bush

George Bush

P.S. I repeat! Without your immediate financial support, our Republican Senate candidates in South Dakota, Nevada, Louisiana, and California are going to lose. And we in turn could lose Republican control of the Senate.

That's why I urge you to send an emergency contribution of $35 today. Thank you!

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NATIONAL REPUBLICAN SENATORIAL COMMITTEE

EMERGENCY CANDIDATE SUPPORT REPLY

DEADLINE

Dear Vice President Bush,

I understand that our Senate campaigns in South Dakota, Nevada, Louisiana, and California need immediate financial assistance to win this November. To make sure our candidates have the funds they need, I'm enclosing the most generous contribution I can to be split equally among them. Enclosed please find my special candidate check for:

( ) $50 ( ) $35 ( ) $___ Other

Mr. [redacted]

L614 00789246

PLEASE MAKE YOUR CHECK PAYABLE TO THE NATIONAL REPUBLICAN SENATORIAL COMMITTEE.

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440 FIRST STREET, N.W., SUITE 700

P.O. BOX 2780

WASHINGTON, D.C. 20013

OFFICE OF THE
VICE PRESIDENT
THE HONORABLE GEORGE BUSH

September 2, 1986

[redacted]

Dear [redacted]

Our Republican Senate candidates in Colorado, Alabama, Florida, and Missouri are on the verge of running out of money.

And if these candidates don't receive emergency funding fast, they'll be defeated on November 4th.

President Reagan and I have discussed this situation, and we're both very concerned. Because a shift of just 4 seats will give control of the Senate back to the Democrats.

I regret having to send this urgent letter, but in my political career no letter has ever been more important.

And because you are one of our Party's most dedicated supporters, I felt I had to write to you myself to ask if you'd please send an immediate contribution of $15 today.

With the November elections only 63 days away, we don't have a single moment to spare. For if each of these four candidates don't raise at least $236,500 in the next 21 days -- they'll lose.

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Or whether our adversaries are going to be given the power to pull us off course.

And if these four candidates end up losing on election day

because they ran out of money at this critical "Make or Break" point in their campaigns, then we're almost certainly going to lose President Reagan's precious Republican Majority in the U.S. Senate.

If this happens, you and I will never forgive ourselves if we know in our hearts we hadn't done everything within our power to help these four candidates in this -- their greatest hour of need.

That's why, as Vice President and therefore President of the U.S. Senate, I'm doing everything I can to help each of these four candidates. But I'm only one man. And my efforts alone aren't enough to ensure victory.

The hard reality is this: all four of these fine Republican Senate candidates desperately need your help today.

And your action -- or inaction -- now will quite literally mean political life or death for each of these candidates.

That's why it's absolutely essential that you send in an immediate $15 contribution today.

To expedite the distribution of your contribution, the National Republican Senatorial Committee (NRSC) has agreed to serve as the central clearing house.

If you'll write out your $15 check directly to the NRSC, they'll see to it that every penny of your generous contribution is evenly split and immediately delivered to each of these four candidates.

Please, whatever you decide to send, even if it's not $15, I urge you to send it to me without delay.

I'm depending on you [redacted] And depending on a loyal friend like you to help me solve this crisis is good enough for me.

Sincerely,

George Bush

George Bush

P.S. I repeat! Without your immediate financial support, our Republican Senate candidates in Colorado, Alabama, Florida, and Missouri are going to lose. And we in turn could lose Republican control of the Senate.

That's why I urge you to send an emergency contribution of $15 today. Thank you!

NATIONAL REPUBLICAN SENATORIAL COMMITTEE

EMERGENCY CANDIDATE SUPPORT REPLY

[illegible] DEADLINE

Dear Vice President Bush,

I understand that our Senate campaigns in Colorado, Alabama, Florida, and Missouri need immediate financial assistance to win this November. To make sure our candidates have the funds they need, I'm enclosing the most generous contribution I can to be split equally among them. Enclosed please find my special candidate check for:

( ) $30 ( ) $15 ( ) $___ Other

[redacted]

L623 00284684

PLEASE MAKE YOUR CHECK PAYABLE TO THE NATIONAL REPUBLICAN SENATORIAL COMMITTEE.

440 FIRST STREET, N.W., SUITE 700 ■ WASHINGTON, D.C. 20001

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℅ NATIONAL REPUBLICAN SENATORIAL COMMITTEE
440 FIRST STREET, N.W., SUITE 700
P.O. BOX 2780
WASHINGTON, D.C. 20013

OFFICE OF THE
VICE PRESIDENT
THE HONORABLE GEORGE BUSH

September 2, 1986

[redacted]

Dear [redacted]

Our Republican Senate candidates in Vermont, North Carolina, South Dakota, and Nevada are on the verge of running out of money.

And if these candidates don't receive emergency funding fast, they'll be defeated on November 4th.

President Reagan and I have discussed this situation, and we're both very concerned. Because a shift of just 4 seats will give control of the Senate back to the Democrats.

I regret having to send this urgent letter, but in my political career no letter has ever been more important.

And because you are one of our Party's most dedicated supporters, I felt I had to write to you myself to ask if you'd please send an immediate contribution of $25 today.

With the November elections only 63 days away, we don't have a single moment to spare. For if each of these four candidates don't raise at least $236,500 in the next 21 days -- they'll lose.

It's that simple -- and that frightening!

That's why I'm counting on you to rush me your check for $25 by return mail today.

There is no doubt that 1986 is a pivotal election year. And for you, myself and President Reagan -- the stakes couldn't be higher.

You see, on November 4th the American people will decide whether the Republican Leadership in the U.S. Senate is going to continue working "hand-in-hand" with President Reagan guiding our Nation.

Or whether our adversaries are going to be given the power to pull us off course.

And if these four candidates end up losing on election day

because they ran out of money at this critical "Make or Break" point in their campaigns, then we're almost certainly going to lose President Reagan's precious Republican Majority in the U.S. Senate.

If this happens, you and I will never forgive ourselves if we know in our hearts we hadn't done everything within our power to help these four candidates in this -- their greatest hour of need.

That's why, as Vice President and therefore President of the U.S. Senate, I'm doing everything I can to help each of these four candidates. But I'm only one man. And my efforts alone aren't enough to ensure victory.

The hard reality is this: all four of these fine Republican Senate candidates desperately need your help today.

And your action -- or inaction -- now will quite literally mean political life or death for each of these candidates.

That's why it's absolutely essential that you send in an immediate $25 contribution today.

To expedite the distribution of your contribution, the National Republican Senatorial Committee (NRSC) has agreed to serve as the central clearing house.

If you'll write out your $25 check directly to the NRSC, they'll see to it that every penny of your generous contribution is evenly split and immediately delivered to each of these four candidates.

Please, whatever you decide to send, even if it's not $25, I urge you to send it to me without delay.

I'm depending on you. And depending on a loyal friend like you to help me solve this crisis is good enough for me.

Sincerely,

George Bush

P.S. I repeat! Without your immediate financial support, our Republican Senate candidates in Vermont, North Carolina, South Dakota, and Nevada are going to lose. And we in turn could lose Republican control of the Senate.

That's why I urge you to send an emergency contribution of $25 today. Thank you!

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NATIONAL REPUBLICAN SENATORIAL COMMITTEE

EMERGENCY CANDIDATE SUPPORT REPLY

Dear Vice President Bush,

DEADLINE: NOVEMBER 23RD

I understand that our Senate campaigns in Vermont, North Carolina, South Dakota, and Nevada need immediate financial assistance to win this November. To make sure our candidates have the funds they need, I'm enclosing the most generous contribution I can to be split equally among them. Enclosed please find my special candidate check for:

( ) $40 ( ) $25 ( ) $___ Other

[redacted]

L644 00839191

PLEASE MAKE YOUR CHECK PAYABLE TO THE NATIONAL REPUBLICAN SENATORIAL COMMITTEE.

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P.O. BOX 2780

WASHINGTON, D.C. 20013

OFFICE OF THE
VICE PRESIDENT
THE HONORABLE GEORGE BUSH

September 2, 1986

Mr. [redacted]

Dear Mr. [redacted]

Our Republican Senate candidates in Arkansas, South Dakota, Georgia, and Alabama are on the verge of running out of money.

And if these candidates don't receive emergency funding fast, they'll be defeated on November 4th.

President Reagan and I have discussed this situation, and we're both very concerned. Because a shift of just 4 seats will give control of the Senate back to the Democrats.

I regret having to send this urgent letter, but in my political career no letter has ever been more important.

And because you are one of our Party's most dedicated supporters, I felt I had to write to you myself to ask if you'd please send an immediate contribution of $70 today.

With the November elections only 63 days away, we don't have a single moment to spare. For if each of these four candidates don't raise at least $236,500 in the next 21 days -- they'll lose.

It's that simple -- and that frightening!

That's why I'm counting on you to rush me your check for $70 by return mail today.

There is no doubt that 1986 is a pivotal election year. And for you, myself and President Reagan -- the stakes couldn't be higher.

You see, on November 4th the American people will decide whether the Republican Leadership in the U.S. Senate is going to continue working "hand-in-hand" with President Reagan guiding our Nation.

Or whether our adversaries are going to be given the power to pull us off course.

And if these four candidates end up losing on election day

because they ran out of money at this critical "Make or Break" point in their campaigns, then we're almost certainly going to lose President Reagan's precious Republican Majority in the U.S. Senate.

If this happens, you and I will never forgive ourselves if we know in our hearts we hadn't done everything within our power to help these four candidates in this -- their greatest hour of need.

That's why, as Vice President and therefore President of the U.S. Senate, I'm doing everything I can to help each of these four candidates. But I'm only one man. And my efforts alone aren't enough to ensure victory.

The hard reality is this: all four of these fine Republican Senate candidates desperately need your help today.

And your action -- or inaction -- now will quite literally mean political life or death for each of these candidates.

That's why it's absolutely essential that you send in an immediate $70 contribution today.

To expedite the distribution of your contribution, the National Republican Senatorial Committee (NRSC) has agreed to serve as the central clearing house.

If you'll write out your $70 check directly to the NRSC, they'll see to it that every penny of your generous contribution is evenly split and immediately delivered to each of these four candidates.

Please, whatever you decide to send, even if it's not $70, I urge you to send it to me without delay.

I'm depending on you [redacted]. And depending on a loyal friend like you to help me solve this crisis is good enough for me.

Sincerely,

George Bush

George Bush

P.S. I repeat! Without your immediate financial support, our Republican Senate candidates in Arkansas, South Dakota, Georgia, and Alabama are going to lose. And we in turn could lose Republican control of the Senate.

That's why I urge you to send an emergency contribution of $70 today. Thank you!

C20407366

NATIONAL REPUBLICAN SENATORIAL COMMITTEE

EMERGENCY CANDIDATE SUPPORT REPLY

Dear Vice President Bush,

I understand that our Senate campaigns in Arkansas, South Dakota, Georgia, and Alabama need immediate financial assistance to win this November. To make sure our candidates have the funds they need, I'm enclosing the most generous contribution I can to be split equally among them. Enclosed please find my special candidate check for:

( ) $100 ( ) $70 ( ) $___ Other

[redacted]

L656 00571783

PLEASE MAKE YOUR CHECK PAYABLE TO THE NATIONAL REPUBLICAN SENATORIAL COMMITTEE.

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P.O. BOX 2780

WASHINGTON, D.C. 20013

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OFFICE OF THE
VICE PRESIDENT
THE HONORABLE GEORGE BUSH

September 2, 1986

[redacted]

Dear [redacted]

Our Republican Senate candidates in South Dakota, Nevada, Louisiana, and California are on the verge of running out of money.

And if these candidates don't receive emergency funding fast, they'll be defeated on November 4th.

President Reagan and I have discussed this situation, and we're both very concerned. Because a shift of just 4 seats will give control of the Senate back to the Democrats.

I regret having to send this urgent letter, but in my political career no letter has ever been more important.

And because you are one of our Party's most dedicated supporters, I felt I had to write to you myself to ask if you'd please send an immediate contribution of $500 today.

With the November elections only 63 days away, we don't have a single moment to spare. For if each of these four candidates don't raise at least $236,500 in the next 21 days -- they'll lose.

It's that simple -- and that frightening!

That's why I'm counting on you to rush me your check for $500 by return mail today.

There is no doubt that 1986 is a pivotal election year. And for you, myself and President Reagan -- the stakes couldn't be higher.

You see, on November 4th the American people will decide whether the Republican Leadership in the U.S. Senate is going to continue working "hand-in-hand" with President Reagan guiding our Nation.

Or whether our adversaries are going to be given the power to pull us off course.

And if these four candidates end up losing on election day because they ran out of money at this critical "Make or Break" point in their campaigns, then we're almost certainly going to lose

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President Reagan's precious Republican Majority in the U.S. Senate.

If this happens, you and I will never forgive ourselves if we know in our hearts we hadn't done everything within our power to help these four candidates in this -- their greatest hour of need.

That's why, as Vice President and therefore President of the U.S. Senate, I'm doing everything I can to help each of these four candidates. But I'm only one man. And my efforts alone aren't enough to insure victory.

The hard reality is this: all four of these fine Republican Senate candidates desperately need your help today.

And your action -- or inaction -- now will quite literally mean political life or death for each of these candidates.

That's why it's absolutely essential that you send in an immediate $500 contribution today.

To expedite the distribution of your contribution, the National Republican Senatorial Committee (NRSC) has agreed to serve as the central clearing house.

If you'll write out your $500 check directly to the NRSC, they'll see to it that every penny of your generous contribution is evenly split and immediately delivered to each of these four candidates.

Please, whatever amount you decide to send, even if it's not $500, I urge you to send it to me without delay.

I'm depending on you [redacted] And depending on a loyal friend like you to help me solve this crisis is good enough for me.

Sincerely,

George Bush

P.S. I repeat! Without your immediate financial support, our Republican Senate candidates in South Dakota, Nevada, Louisiana, and California are going to lose. And we in turn could lose Republican control of the Senate.

That's why I urge you to send an emergency contribution of $500 today. Thank you!

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NATIONAL REPUBLICAN SENATORIAL COMMITTEE

EMERGENCY CANDIDATE SUPPORT REPLY

URGENT
DEADLINE

~~Dear Vice President Bush,~~

I understand that our Senate campaigns in South Dakota, Nevada, Louisiana, and California need IMMEDIATE financial assistance to win this November. To make sure our candidates have the funds they need, I'm enclosing the most generous contribution I can to be split equally among them. Enclosed please find my special candidate check for:

( ) $500 ( ) $250 ( ) $ Other

[redacted]

PLEASE MAKE YOUR CHECK PAYABLE TO THE NATIONAL REPUBLICAN SENATORIAL COMMITTEE.

K609 02243138

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WASHINGTON, D.C. 20013

BOB DOLE

SENATE MAJORITY LEADER

October 2, 1985

Ms. Joretta A. Watts
1441 Five Hill Trail
Va. Beach, Virginia 23452

Dear Raymond:

I would like you to have dinner with Vice President George Bush and myself here in Washington on November 14.

I know it's asking a lot of you to travel so far, but I have something extremely important to discuss with you.

You see, the Vice President and I are helping the National Republican Senatorial Committee spearhead the formation of a totally new program.

It's called Majority '86.

I want to explain to you why I believe Majority '86 is the key to our retaining Republican control of the Senate in 1986. In fact, I think Majority '86 is so important that I've already signed up to become a Charter Member.

But the power to save the Senate from Democrat takeover is not mine. It is yours and yours alone.

Twenty-two Republican Senate seats are at stake next year; more than at any one time since 1926.

One of those twenty-two Republican seats is my own. Campaigning for my own re-election means I won't be able to help our other 33 defenders and challengers as much as I'd like.

If any four of my current Republican colleagues are defeated -- and the Democrats hold their 12 seats -- the bright, brief years of Republican progress will be snuffed out completely.

That's why I would consider it a personal favor if you would agree to join with me in becoming a Charter Member of Majority '86.

Majority '86 involves a commitment of $5,000. One thousand dollars will go directly to the National Republican Senatorial Committee to help them raise the $11.5 million they need to fully fund each of the 34 Republican Senate campaigns.

440 FIRST STREET, N.W., SUITE 600 • WASHINGTON, D.C. 20001 • (202) 347-0202

The balance of your Majority '86 commitment ($4,000) will go directly to any four selected candidates of your choice.

Here's how Majority '86 works:

1. You begin by making a $1,000 contribution to the National Republican Senatorial Committee's Majority '86.

2. You pledge to make individual contributions of $1,000 each directly to four Republican Senate candidates in the states of your choice, following their nomination.

3. You will be invited to four confidential briefings on the progress of the 1986 Senate campaigns between November 1985 and November 1986.

4. Your initial $1,000 contribution to Majority '86 also covers your membership dues in the Republican Senatorial Inner Circle for the exciting 1986 election year.

We can talk more about the specific details of Majority '86 over dinner on November 14. I do hope you'll make every effort to join us.

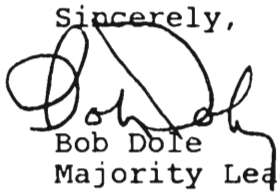
But if you cannot make it to the dinner, please don't let that stand in your way of joining Majority '86.

If we can retain Republican control of the Senate next year, there's a good chance we'll be able to carry the "Reagan Revolution" into the 21st century.

So I'm urging you to join the Vice President and me as a Charter Member of Majority '86.

I look forward to seeing you in November. If you have any questions regarding the program, please call the Majority '86 hotline at 1-800-722-1188.

Sincerely,



Bob Dole
Majority Leader

P.S. Prior to dinner on November 14, the Republican Senatorial Committee is sponsoring an in-depth Majority '86 briefing. Specific details on the day's activities will be mailed to you upon receipt of the Charter Membership Acceptance card I've enclosed. Since guest facilities for our dinner are limited, I'd be grateful if you could return your acceptance card by October 15th.

RONALD REAGAN

September 25, 1985

Dear Bob,

I agree with you that the success of Majority '86 is essential to our long range goal of further expanding freedom and opportunity within our nation and throughout the world.

My term as President has been blessed by six straight years of Republican majority control in the U.S. Senate. I know I don't have to explain to you what would happen to all that we've accomplished together if the Democrats regain control of both houses of Congress in 1986.

Bob, I believe Majority '86 is key to retaining a Republican Senate in the next election. That's why I'm glad you're doing everything in your power to insure the success of this critically important program.

Thanks once more for all you're doing and the best of luck to you in this vital endeavor.

Sincerely,

Ronald Reagan

Ronald Reagan

The Honorable Bob Dole
The Majority Leader
United States Senate
Washington, DC 20510

Paid for and authorized by the National Republican Senatorial Committee

CHARTER MEMBERSHIP ACCEPTANCE

Dear Senator Dole:

[ ] Yes, I accept your invitation to become a Charter Member of Majority '86. I've enclosed my check in the amount of $1,000, payable to Majority '86. I understand that my contribution automatically renews my membership for 1986 in the Republican Senatorial Inner Circle.

[ ] In addition, I pledge to contribute an additional $1,000 directly to four Senate candidates of my choice between now and Election Day, 1986.

[ ] As a Charter Member of Majority '86, I will attend the dinner in Washington, D.C.

[ ] Even though I've made a commitment to Majority '86, I won't be able to attend the dinner.

[ ] No, at this time I cannot accept your invitation to become a Charter Member of Majority '86, but I do wish to support the Majority '86 program with a contribution of $_____.

_____
signature

Ms. Joretta A. Watts
1441 Five Hill Trail
Va. Beach, Virginia 23452

_____ _____
date telephone

If your name or address is listed incorrectly, please make the necessary changes above. Thank you.

MJ28

440 FIRST STREET, N.W., SUITE 600
WASHINGTON, D.C. 20001

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MAJORITY '86: Why Is It Needed?

The 1986 elections for the United States Senate are the most important Senate elections in this century.

Here's why.

In 1986 there are 22 Republican Senate seats at risk. 15 of these Republican incumbents are freshmen–11 of whom won by a margin of 52% or less in states that have historically elected Democrats to the Senate.

And if history is any guide, the chances of the Republican Party retaining control of the Senate look pretty bleak.

In every second mid-term election since 1918, the party in control of the White House has lost an average of 7 seats in the United States Senate.

That is why the National Republican Senatorial Committee created an innovative new program called ***"Majority '86."***

Majority '86 is a totally new concept in political finance. It's the key to reversing the historical trend of major losses in the Senate by the Party of a second term President.

Majority '86 is the key to maintaining Republican control of the United States Senate in 1986.

A special program of the
National Republican Senatorial Committee

MAJORITY '86

Officers of the Senate

Vice President George Bush
President of the Senate

Hon. Strom Thurmond
President Pro Tempore

Hon. Robert J. Dole
Majority Leader

Hon. Alan K. Simpson
Assistant Majority Leader

Hon. John H. Chafee
Republican Conference Chairman

Hon. Thad Cochran
Republican Conference Secretary

Hon. William L. Armstrong
Republican Policy Committee Chairman

Hon. John Heinz
Republican Senatorial Committee Chairman

MAJORITY '86

The key to maintaining Republican control of the United States Senate

MAJORITY '86: What Is It?

Majority '86 is a unique concept designed to make certain that, when and where a Republican Senate candidate faces an unexpected danger or opportunity, he or she has the financial resources necessary to fend off the danger or take advantage of the opportunity.

In Senate campaigns, just as in businesses, sometimes $40 or $50 thousand—at just the right time and place—can tip the whole election.

MAJORITY '86: How Does It Work?

Majority '86 works as a nationwide campaign support network. It does this in two important ways:

1) Majority '86 links you, the Charter Member, with the accurate, up-to-the-minute information you need to make an informed decision as to where your campaign dollars can be most effectively utilized and can have the biggest impact.

2) Majority '86 provides each Republican Senate campaign with a source of emergency funding, if and when it is needed.

MAJORITY '86: What Is The Commitment?

As a Majority '86 Charter Member, you will be making a commitment of $5,000—100% of which will go directly to Republican candidates running for the U.S. Senate.

Your commitment will be distributed as follows:

- $1,000 will be deposited in an escrow account at the National Republican Senatorial Committee to help the NRSC meet its legal responsibility to spend $11.5 million in support of all 34 Republican Senate candidates.

(Note: Federal election law mandates that Senate candidates can get this $11.5 million allocation only from a Party committee, i.e., the National Republican Senatorial Committee.)

- $1,000 will go directly to each of four Republican Senate candidates ***you*** select. Your choice will be based on the information you receive through Majority '86 confidential briefings and reports.

MAJORITY '86: What Are The Benefits Of Membership?

Aside from the personal satisfaction of playing a vitally important role in maintaining Republican control of the U.S. Senate, Charter Membership in Majority '86 also offers ***you*** several tangible benefits in recognition of your extraordinary commitment.

These tangible benefits are:

- ***Confidential Briefings:*** You'll be invited to attend top-level briefings with Republican Senators, senior White House officials and key Party strategists during the election year. Our candidates and political experts will give you the latest facts on each race to help you make your decisions as to where your candidate contributions should go.

After each briefing there will be a "members only" evening social function with a host of Washington dignitaries, including Vice President Bush, Majority Leader Dole, the Republican Senate delegates and senior White House officials.

- ***Political Intelligence Alert:*** You'll receive regular issues of this confidential advisory that will keep you up-to-date on our best targets of opportunity: which of our incumbents truly need your immediate help, and where your Majority '86 dollars are necessary to tip the scale of victory in our favor.

- ***Membership in the Republican Senatorial Inner Circle:*** All Majority '86 members are automatically given full membership in the Inner Circle. As a member of this exclusive organization, you'll be invited to attend all Inner Circle functions, including two Washington events with White House and Party dignitaries.

In addition, every dues-paying member of the Inner Circle for 1986 is eligible to join Majority '86 if he or she chooses to make the commitment.

- ***Limited Edition Artwork:*** Upon making your $5,000 commitment, you'll be presented with a fine lithograph of an artist's drawing of Vice President Bush, along with his personal message of appreciation.

This exquisite keepsake will forever identify you as a special friend who stood with the Vice President and our Republican Senate majority when they needed you the most.

MAJORITY '86: Who Do I Contact For More Information?

If this unique funding concept is of interest to you, we invite you to join us as a Charter Member of Majority '86.

Please call Mr. Ed Forgotson, National Chairman of Majority '86, on our Majority '86 hotline number, 1-800-722-1188, or write the National Republican Senatorial Committee, 440 First Street, Northwest, Washington, D.C., 20001.

GEORGE BUSH

October 9, 1985

Mrs. Eleanor S. Todd
Box 146
Oldwick, New Jersey 08858

Dear Mrs. Todd:

I know it has been only a short while since Bob Dole invited you to join us for dinner in Washington, D.C., on November 14th.

But because I believe your presence and your support of our joint effort, Majority '86, is so important, I am following up Bob's letter with a personal invitation of my own.

First, I want to explain why I believe the outcome of the 1986 battle for control of the U.S. Senate will decide the future course of our nation for the rest of this century.

As Vice President, and therefore President of the U.S. Senate, for the last five years I've seen on countless occasions a critical program of President Reagan's pass the Senate only because of our 3-vote advantage over the Democrats.

Equally important, as the majority party, we have control over:

* the selection of Committee Chairmen, who decide when -- or even if -- legislation will reach the floor for a vote;

* the Senate calendar and schedule that sets the terms and times of debate on each bill;

* and dozens of other procedural matters that often go unnoticed, but have a direct impact on the thrust and content of each piece of Senate legislation.

In fact, these legislative control mechanisms are so important that it's no exaggeration to say that, in large measure, it's been our Republican majority that has made much of our progress, as a Party and a nation, possible.

If you and I want that progress to continue, we must do everything we can to retain control of the Senate next year.

But if history is any guide, you'd have to say that the odds are against us holding our Republican majority in 1986.

In every second mid-term election since 1918, the Party in control of the White House has lost an average of 7 seats. Next year, the Democrats need only 4 of our seats to win the majority.

440 FIRST STREET, N.W., SUITE 600 • WASHINGTON, D.C. 20001 • (202) 347-0202

PAID FOR BY THE NATIONAL REPUBLICAN SENATORIAL COMMITTEE

In 1986, we have nearly twice as many seats to defend as the Democrats. And 15 of our incumbents are freshmen -- 11 of whom won by a margin of 52% or less in states that have historically elected only Democrats to the Senate.

Clearly, it won't take a major loss next year in order for us to lose our Senate majority.

That's why I want to urge you to accept my personal invitation to become a Charter Member of Majority '86.

I hope you will join Bob and me for dinner on November 14th so we can discuss with you our plans for this unique project, and explain why your support is essential to our success. I also want to hear your suggestions and ideas for creating a winning Senate campaign in 1986.

I know, of course, that you are an active member of the Fund for America's Future. And I hope you know that your support of the Fund is essential to our goal of electing more Republicans at every level of government.

But your participation in Majority '86 is also important and, in fact, will complement your Fund membership. Your commitment will give our Party additional backing where it is needed most in 1986 -- in our battle to retain majority control of the U.S. Senate.

If you've already responded to Bob's invitation, please accept my heartiest thanks. But even if you are unable to attend, I do hope you'll take a moment now to complete and return the Charter Membership Acceptance I've enclosed.

If you have any questions concerning Majority '86 or the dinner, please call 1-800-722-1188.

I'm looking forward to seeing you on the 14th, and to thanking you personally for all you're doing to support the President, our candidates and our Party.

Sincerely,

George Bush

P.S. Unfortunately, our space for the dinner is somewhat limited, and Bob has already received quite a few acceptances. Please let me know as soon as you can whether you'll be joining us. If you cannot attend, I hope we can still count on your support of Majority '86.

Enclosures
cc: Senator Bob Dole

GERALD FORD

October 15, 1985

Mr. Edwin C. Andrews
400 Main Street, Rm. 512
Stamford, Connecticut 06901

Dear Edwin:

Recently, Vice President Bush and Senator Bob Dole asked me to write to you about becoming a Charter Member of Majority '86.

This unique and critically important campaign effort has been set up to insure that our Senate candidates have the full resources they need to overcome an unprecedented effort by the Democrat/liberal coalition to regain majority control of the U.S. Senate in 1986.

After talking with George and Bob about Majority '86, I felt that this new campaign program is so well-designed -- and so critical to a Republican victory next year -- that I decided to do more than ask you to join; I became a Charter Member myself.

And I am writing today to tell you why I joined Majority '86, and why I believe you should, too.

I know, from a very personal standpoint, what will happen if the Republican Party fails to hold our majority in the U.S. Senate in 1986.

During my years as President, I was forced to cast 66 Presidential vetoes, cancelling ill-conceived and wasteful spending programs passed by the Democrat-controlled Congress.

What's more, vital programs I supported -- such as balanced budgets, tax reductions and modernization of our defenses -- were stridently opposed by the liberal Democrat majority that controlled Congress.

But since 1980, President Reagan has been able to enact policies that have launched our nation into a new era of peace, prosperity and growth.

He has succeeded in large part because he's had the backing of our Republican majority in the United States Senate.

However, even though President Reagan has the overwhelming support of the American people, he will find his last two years in office very tough going if the Senate falls back into the hands of a Democrat majority.

And right now, the danger of our losing the Senate is greater than ever before.

If, on the other hand, we can hold on to our majority through the 1986 elections, there's every indication that the Senate will remain in Republican control for years to come -- possibly into the next century.

That would give Ronald Reagan's Republican successor a chance to continue the agenda the President has begun. It would also put our Party in a position to win control of the U.S. House of Representatives within the next few years.

But the key to all of this is stopping the Democrats from regaining control of the Senate in 1986.

And your active involvement in Majority '86, as well as my own, could very well prove to be the deciding factor in saving our Senate majority.

As George and Bob explained to you, becoming a member of Majority '86 involves a commitment of $5,000: $1,000 to be deposited in a candidate escrow account at the National Republican Senatorial Committee, and $4,000 to be contributed by you directly to the four Senate campaigns where you believe your dollars can have the greatest impact.

Majority '86, through confidential briefing sessions, will give you the information you need to choose the campaigns where your $1,000 could make the difference between victory and defeat for our candidates.

C20407363

I believe very strongly that keeping the Senate in Republican hands is worth every penny of my Majority '86 commitment. However, if you feel you cannot make such a substantial commitment, I do hope you will send at least $1,000 now to the NRSC's candidate escrow account, and reserve your right to join Majority '86 later on.

Senator Dole has informed me that your $1,000 contribution now will qualify you for membership in the exclusive Republican Senatorial Inner Circle for the 1986 election year.

Whatever you decide, I urge you to take a moment now to mail your reply form to me. There is still time to reserve your place at the first Majority '86 briefing and dinner, to be held in Washington on November 14.

I think Majority '86 has the potential to become the most potent political weapon in our campaign arsenal for 1986. And I look forward to working with you in the coming year to make Majority '86 a success.

With warm regards,

Jerry Ford

Gerald R. Ford

P.S. The Democrats need to win only four of our Senate seats to regain majority control. And the four campaigns you select may be the ones that tip the balance in our favor on Election Day. But without your help now, the odds will remain stacked against us. Please join me today as a Charter Member of Majority '86.

March 17, 1986

Mr. John Sample
123 Main Street
Anywhere, Virginia 12345

Mr. Sample:

On behalf of the Republican leadership of the U.S. Senate, I want to offer you a very special invitation.

We would like you to join us at the White House on April 15th for the Majority '86 Confidential Briefing on our 1986 Senate campaign.

Our Majority '86 meeting immediately follows the Inner Circle's 1986 Spring Briefing. And believe me, it will be worth staying for.

You'll receive the most current political intelligence on each of our Senate races, as well as a comprehensive campaign overview from four of the President's top political advisors.

As you may know, Majority '86 is our Party's newest campaign program, designed specifically and solely to meet the incredible challenge we face in this year's Senate elections.

It is a unique concept in political fundraising. Majority '86 allows you to decide, based on confidential campaign reports from Party leaders, where your dollars will have the greatest impact. Then you make your contributions directly to the Republican Senatorial candidates of your choice.

Our April 15th Confidential Briefing will be our second of the 1986 campaign season. Attendance is strictly limited to Majority '86 members -- each of whom must make a financial commitment of $5,000 (a $1,000 initial contribution to our Majority '86 candidate escrow account, followed by four $1,000 contributions directly to each of four Republican Senate candidates).

However, because you are a valued member of the Republican Senatorial Inner Circle, if you renew your Inner Circle membership today we will credit your 1986 dues of $1,000 to your Majority '86 commitment, if you join the program now.

In other words, we will waive your initial $1,000 membership contribution to Majority '86, so your total membership commitment

will be $4,000, or four $1,000 direct contributions to four Senate candidates of your choice.

To join Majority '86 under this special arrangement, please complete the Membership Acceptance and the Candidate Commitment Card I've enclosed.

Then return both with your $1,000 renewal contribution to the Inner Circle, along with your first Majority '86 candidate commitment check for $1,000.

The candidate you support is up to you. However, on your Briefing Registration Reply, I've listed three of our candidates who are in serious need of your help right now if they are to have a chance of winning in November.

Your $1,000 contribution today to one of these campaigns could turn the race around for our candidate, and put him in the Republican victory column on November 4th.

The invitation booklet I've enclosed explains our Majority '86 program in detail and gives you the complete agenda for our private meeting on the 15th.

I urge you to complete the registration reply I've enclosed and return it with your Inner Circle renewal check for $1,000, your first Candidate Commitment of $1,000 to join Majority '86 and your conference fee of $65.

Mr. Sample, my Republican colleagues and I agree that your loyal support of the Inner Circle warrants this special membership arrangement.

We also agree that your involvement in Majority '86 and our Confidential Briefing is critical to retaining our Republican majority in the Senate this year.

Please don't let this opportunity pass by to join the one campaign effort that could decide the outcome of this historic election battle.

I hope very much to see you on April 15th.

Sincerely,

John Heinz
Chairman

P.S. I urge you to take advantage of this special membership arrangement. We need your support of the Inner Circle AND Majority '86, and we need your input at our April Confidential Briefing. Please return the enclosed documents and your contribution checks today to guarantee your place at our event.

'86

Special Membership Accepta

Dear Senator

key

Republican Control of the U.S.

I also recognize that my financial commitment is essential
Majority '86 is to fulfill its potential of
has in
election battle.

( ) I hereby accept membership in Majority '86
special terms set up exclusively for members of the
Republican Senatorial Inner Circle.

enclosed my contributi
are made payable to Majority '86.

also completed the Ma
Committee. Enclosing it

Immediate -- Refer to Briefing Registration Reply

in greatest need of your help now.

( ) I
was
My Reg
Reply
and
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I am
joining
Special

Mr. John Sample
Main
Anywhere, USA 12345

Majority '86
Republican Senatorial Committee
N.W. Suite 500 • Washington, D.C. 20036

Mr. John Sample

OFFICE USE ONLY
Amt. Pd. _____
Ck. # _____
Date Rec'd _____
Mem. ID 00660672

MAJORITY '86 REGISTRATION FORM

Spring Confidential Briefing
Washington, D.C.
April 15, 1986

Member's Name _____

Social Security # _____ Date of Birth _____

Spouse Guest's Name _____

Social Security # _____ Date of Birth _____

Address _____

City _____ State _____ Zip _____

Telephone (Office) _____ (Home) _____

Hotel you plan to stay in _____

These are the Republican senatorial candidates who are in serious need of your support right now. Please indicate which candidate you will contribute to, then fill out the enclosed Candidate Commitment Card and return it with your check for $1,000 made payable to the candidate's campaign committee.

- ☐ **Senator Jeremiah Denton** (Incumbent—Alabama)
  Jeremiah Denton for Senate Committee
- ☐ **Former Governor Richard Snelling** (Challenger—Vermont)
  Snelling '86 Committee
- ☐ **Former U.S. Rep. James Santini** (Republican open seat—Nevada)
  Santini for Senate

Please indicate which of the following activities you will attend:

Member	Spouse Guest	Majority '86 Briefing Activities
☐	☐	**"Scoreboard Breakfast"**
☐	☐	**"White House Overview"** at the Old Executive Office Building (space limited)
☐	☐	**Luncheon with invited guest, White House Chief of Staff, Donald T. Regan**

The Majority '86 conference fee of $65 per person entitles you to attend each of the activities listed above. These activities are open only to charter members of Majority '86 and their spouses or guests.

Please make your check payable to CAPITOL CONFERENCE CATERING and enclose in the envelope provided addressed to:

Majority '86 Spring Confidential Briefing
c/o Capitol Conference Catering
Post Office Box 726
Falls Church, Virginia 22046-0726

To help our Regional Finance Directors better assist you during your visit to Washington, D.C., please indicate whether or not you plan to attend the Republican Senatorial Inner Circle Spring Briefing on April 13 & 14.

☐ **Yes** ☐ **No** ☐ **Undecided**

6C34

MAJORITY '86

CANDIDATE COMMITMENT FORM

440 First Street, N.W.
Washington, D.C. 20001

No. 12684

_____ 19 __
Commitment Date

PAY TO THE
ORDER OF THE
GENERAL ELECTION OF: **$1,000.00**

(TYPE OR PRINT CANDIDATE COMMITTEE NAME)

One thousand and no/100 _____ DOLLARS

THIS CANDIDATE COMMITMENT
WILL BE PAID BY:

_____ / _____ / _____
MONTH DAY YEAR

CANDIDATE'S COPY

_____
NAME

_____
SIGNATURE

May 21, 1986

Mrs. Deborah Dentzer
440 First Street, N.W.
Suite 600
Washington, D.C. 2001

Dear Deborah:

Enclosed is a Summary of the Proposed Tax Reform Provisions currently pending before the U.S. Congress.

This piece of Legislation was unanimously approved by the Senate Finance Committee and has President Reagan's strong backing. As a consequence, it has an excellent chance of passage sometime later this year.

And, as an active member of Majority '86, I'm sending you this summary analysis so I can have the benefit of your thoughts before the floor debate on this measure begins in the Senate early next month.

I have enclosed a business reply envelope and ask that you study this proposal and send me your thoughts, ideas, and concerns at your earliest convenience.

Sincerely,

John Heinz

John Heinz

P.S. Our prospects of retaining Republican control of the Senate this November are not good. As of today, we're behind in six Republican States, and donor apathy has seriously undercut our overall fundraising efforts.

So if you can see your way clear to send us a little something extra, I can assure you I'll put it to good use!

Thanks!

OFFICERS OF THE SENATE

VICE PRESIDENT GEORGE BUSH
PRESIDENT OF THE SENATE

HON. STROM THURMOND
PRESIDENT PRO TEMPORE

HON. ROBERT J. DOLE
MAJORITY LEADER

HON. ALAN K. SIMPSON
ASSISTANT MAJORITY LEADER

HON. JOHN H. CHAFEE
REPUBLICAN CONFERENCE CHAIRMAN

HON. THAD COCHRAN
REPUBLICAN CONFERENCE SECRETARY

HON. WILLIAM L. ARMSTRONG
REPUBLICAN POLICY COMMITTEE CHAIRMAN

HON. JOHN HEINZ
REPUBLICAN SENATORIAL COMMITTEE CHAIRMAN

440 FIRST STREET, N.W., SUITE 600 • WASHINGTON, D.C. 20001 • (202) 347-0202

PAID FOR BY THE NATIONAL REPUBLICAN SENATORIAL COMMITTEE

C0740732600

September 10, 1986

Mr. John Sample
123 Main Street
Anywhere, Virginia 12345

Dear John,

Enclosed is a very important video tape I'd like you to watch as soon as possible.

It's only 26 minutes long and it explains as succinctly as anything can why it is absolutely essential we maintain Republican control of the U.S. Senate. It also explains how you can help insure we accomplish this objective.

So I urge you to take just a moment to watch this tape.

Here, in a nutshell, is what you are going to see:

After a short introductory statement, a narrator off screen will highlight what our Republican Majority has actually done for you during the past six years.

Frankly, I think you may find many of the facts and figures more impressive and substantive than you might expect.

After this short briefing, you'll see a select group of TV commercials from seven of our closest and most hotly contested Senate races.

The tape concludes with a short pitch from me about why a prominent Republican leader such as you should help a new candidate support program called Majority '86.

Majority '86 involves a commitment of $5,000 -- $1,000 goes directly to the NRSC to help us raise the $11.5 million we need to fully fund our legal commitment to each of our 34 Senate candidates.

But because you are a member of the Republican Senatorial Inner Circle, this first $1,000 of your Majority '86 commitment will be covered by your Inner Circle membership dues.

The balance of your Majority '86 commitment ($4,000) goes directly to the four Senate candidates you decide to support.

440 FIRST STREET, N.W., SUITE 600 • WASHINGTON, D.C. 20001 • (202) 347-0202

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What's particularly important about your Majority '86 commitment is that every penny will be used to pay for air time to show candidate commercials of the type I've included on this video tape.

I've also enclosed a brochure that gives you more detailed information about our Majority '86 program.

After reading this brochure and watching the video tape, if you still have any questions or concerns, please don't hesitate to call our Majority '86 Chairman, Ed Forgotson, at 1-800-722-1188.

If after talking with Ed or one of his assistants, you are still not convinced your participation in Majority '86 is needed, then I'd deeply appreciate it if you would take a few moments to write me a personal note explaining why.

But whatever you decide, I need to hear from you without delay.

You see, every one of the seven Senate candidates you will see on this video tape is caught up in a tough Senate election that will quite literally be decided by just a few votes -- and just a few dollars -- either way.

So I think you can appreciate why I'm anxious to hear from you.

And why I'm anxious for you to join Majority '86 today.

Sincerely,

John Heinz

John Heinz
Chairman

P.S. Please watch the important video tape I've enclosed for you as soon as you can. It explains why we believe a new program called Majority '86 may very well be the key to saving our Senate majority this year.

As one of our party's foremost supporters, I also hope you'll take this opportunity to join Majority '86. Any contributions you have made to Republican Senate candidates in 1985 or 1986 count towards your total Majority '86 commitment. And I will, of course, see to it that your Inner Circle membership dues are also applied to your Majority '86 pledge.

If you have any questions regarding your Majority '86 commitment, please call the Majority '86 hotline at 1-800-722-1188. Thank you.

June 23, 1986

Mr. John Sample
123 Main Street
Anywhere, Virginia 12345

Dear Mr. Sample:

I'm writing to invite you to a private meeting here in Washington on July 23rd.

Attendance at this meeting is by invitation only and is strictly limited. That's why it's important you let me know by June 30th if you'll be able to attend.

The purpose of this meeting is to give a highly select group of proven Republican donors an in-depth, up-to-date status report on all the critically close United States Senate races.

I'm extending this invitation today to a select few of our Inner Circle members. The information you'll receive at this meeting is confidential.

This briefing is being conducted as part of a totally new candidate support program I've created called Majority '86.

Majority '86 is an important new way you can significantly advance our chances for Republican victory this year.

So I urge you to make a special effort to attend this July 23rd meeting.

This private, one day meeting is only open to Inner Circle membership deciding to participate in Majority '86.

The briefing begins promptly at 10:30 a.m., and by 3:30 p.m. you will be among a handful of Americans completely informed about the way the 1986 Senate elections are shaping up across the country.

After we conclude the briefings and adjourn for a break, we shall be joined for cocktails by Vice President and Mrs. Bush at the historic Decatur House across the street from the White House. Several of my colleagues from both the White House and the Senate will then join us for dinner.

OFFICERS OF THE SENATE

VICE PRESIDENT GEORGE BUSH
PRESIDENT OF THE SENATE

HON. STROM THURMOND
PRESIDENT PRO TEMPORE

HON. ROBERT J. DOLE
MAJORITY LEADER

HON. ALAN K. SIMPSON
ASSISTANT MAJORITY LEADER

HON. JOHN H. CHAFEE
REPUBLICAN CONFERENCE CHAIRMAN

HON. THAD COCHRAN
REPUBLICAN CONFERENCE SECRETARY

HON. WILLIAM L. ARMSTRONG
REPUBLICAN POLICY COMMITTEE CHAIRMAN

HON. JOHN HEINZ
REPUBLICAN SENATORIAL COMMITTEE CHAIRMAN

440 FIRST STREET, N.W., SUITE 600 • WASHINGTON, D.C. 20001 • (202) 347-0202

PAID FOR BY THE NATIONAL REPUBLICAN SENATORIAL COMMITTEE

But even if you cannot attend this confidential briefing, please don't let that stand in the way of your joining our important Majority '86 effort today.

Majority '86 membership entails an increased commitment to our Republican Senate election efforts. Majority '86 members pledge $5,000 over the course of this election year. $1,000 of this goes directly to the National Republican Senatorial Committee to help us raise the $11.5 million we need to fully fund each of our 34 Republican Senate campaigns.

As an Inner Circle member, your $1,000 annual membership dues have already covered this part of your Majority '86 commitment, should you decide to accept my invitation for Majority '86 membership today.

The remaining $4,000 Majority '86 commitment is divided into four equal contributions which are given directly to the Senate candidates of your choice. Please note on your Reply Memorandum that I've listed four of our Senate candidates who are in serious need of funds during this critical phase of the election. Your first $1,000 Majority '86 direct Candidate Contribution check to one of these candidates right now would be a tremendous boost to their campaign.

By the way, if you have already made a maximum contribution to one or more of our 1986 Senate candidates, we will of course count those donations as part of your Majority '86 commitment.

Majority '86 members enjoy a unique status within the entire Republican leadership community. Majority '86 members will routinely be asked to participate in social events at the Presidential and Vice Presidential level.

It is our commitment to keep our Majority '86 team members fully apprised of the political situation as it develops. The type of information we'll be providing at this upcoming event is not for the general public. Reporters will not be admitted to the briefing.

Majority '86 membership is a unique way to place yourself at the very heart of our national Republican political process.

We would be very proud to have you as a new member of this vital organization. Our candidates urgently need the financial boost your Majority '86 commitment would make in these closing months of the campaign.

Every indication is that this will be a well attended event, and since we are only extending an invitation to a select few of our regular Inner Circle membership, I urge you to fill out the Reply Memorandum form and return it with your conference fee of $100 ($200/couple) to reserve your place as soon as possible.

If you have any questions at all about Majority '86 membership, or need assistance in planning your trip to Washington, please don't hesitate to call my special assistant, Susan Ballard, on our Majority '86 hotline at (800) 722-1188.

Sincerely,

John Heinz

John Heinz
Chairman

REPLY MEMORANDUM

TO: SENATOR JOHN HEINZ, CHAIRMAN

FROM: Mr. John Sample
123 Main Street
Anywhere, Virginia 12345

_____ YES, I am interested in joining Majority '86. Enclosed is my $1,000 Candidate Contribution check(s) for one or more of the following candidates:

_____ Friends of Senator Jim Abdnor (South Dakota)

_____ Re-elect Paula Hawkins for Senate (Florida)

_____ Kramer for U.S. Senate Committee (Colorado)

_____ Ed Zschau for U.S. Senate Committee (California)

Additionally, you can expect my next Candidate Contribution check by: __/__/ 86.

_____ YES, I will be attending the July 23rd Majority '86 event. Enclosed is my check (made payable to Capital Conference Catering) for:

_____ $100 Conference fee (individual)

_____ $200 Conference fee (couple)

_____ NO, I cannot join Majority '86 at this time. However, I will make a special contribution to one of the above mentioned campaigns:

_____ $1000 _____ $750 _____ $500 _____ $250 _____ other

_____ _____
signature date

12345678 F07

440 First Street, N.W., Suite 700 • Washington, D.C. 20001

Paid for and authorized by the National Republican Senatorial Committee

MAJORITY '86

John Heinz
CHAIRMAN

February 21, 1986

Mr. John Sample
123 Main Street
Anywhere, Virginia 12345

Dear Mr. Sample:

It is indeed a privilege for me to offer you a unique opportunity to have a direct, personal influence on the outcome of this year's critically important battle to retain Republican control of the United States Senate.

I'm inviting you to become a Charter Member of Majority '86, the most innovative and potentially most powerful campaign program I've been involved with in my political career.

Your name was suggested to me because of your extraordinary record of support for our Party.

To recognize your very special commitment, and to encourage you to take on a new role this year as a member of Majority '86, I've been authorized by the White House to present you with the enclosed official photograph of President Reagan.

This beautiful photograph will serve as the model for the oil painting of President Reagan that will hang in the White House after his term has ended. It is the portrait by which our children and all future generations will come to know and remember this great American President.

The White House has released a very limited number of these photographic prints to Majority '86 to be dedicated and presented only to our Party's most loyal and trusted supporters.

It is because you are one of these very distinguished Americans that I believe your participation in Majority '86 is absolutely essential to our Party's success in this most critical of election years.

Majority '86 was designed with one goal in mind: to preserve our Republican majority in the U.S. Senate in 1986 -- the toughest election challenge we've faced since winning our majority six years ago.

Unlike any other fund-raising program, Majority '86 allows you to choose the candidates to whom your contributions will go.

440 First Street, N.W., Suite 600 • Washington, D.C. 20001
Paid for and authorized by the National Republican Senatorial Committee

8204073465

With your support, Majority '86 will provide our Republican Senate candidates with a weapon they've never had before: a nationwide network of prominent Republicans like you, giving their maximum financial and leadership support when and where it can have the most decisive impact.

Before I tell you more details about our programs, I want to explain why I believe the outcome of the 1986 battle for control of the U.S. Senate will decide the future course of our nation for the rest of this century.

Having been a Republican Senator since before we won majority control in 1980, I've seen first-hand what it means to be the majority party.

On countless occasions, critically important programs of President Reagan's have passed through the Senate only because of our three-vote advantage over the Democrats.

Equally important, as the majority party, we have control over:

* the selection of Committee Chairmen, who decide when -- or even if -- legislation will reach the floor for a vote;

* the Senate calendar and schedule, which sets the terms and times of debate on each bill;

* and dozens of other procedural matters that often go unnoticed, but have a direct impact on the thrust and content of each piece of Senate legislation.

In fact, these legislative control mechanisms are so important it's no exaggeration to say that, in large measure, it's been our Republican majority in the Senate that has made much of our progress, as a Party and a Nation, possible.

If you and I want that progress to continue, it is essential that we maintain control of the Senate this year.

This is why I believe Majority '86 is the most important political effort being carried out this year.

And your direct involvement as a Charter Member is essential to the success of our strategy.

Here's how Majority '86 works:

1) To become a Charter Member, you make a total commitment of $5,000 to Majority '86.

2) You contribute your first $1,000 to the National Republican Senatorial Committee's Candidate Escrow

3 2 0 4 0 7 3 6 3 7

Account, to help us raise the $11.5 million the NRSC can provide to our 34 Senate candidates.

3) You fulfill the balance of your commitment ($4,000) by making individual contributions of $1,000 each directly to four Republican Senate candidates of your choice following their nominations.

4) You will be invited to attend several confidential Majority '86 briefings in Washington on the 1986 races. At these briefings, you'll have an opportunity to meet and talk with our candidates to help you in making your four individual commitment choices.

5) In addition, your Charter Membership in Majority '86 entitles you to full membership in the Republican Senatorial Inner Circle, the prestigious donor group that meets twice each year in Washington with Republican leaders from both the Executive and Legislative branches.

Our next Majority '86 confidential briefing will be held in Washington on April 15th, in conjunction with the Inner Circle's Spring event. I do hope you'll make every effort to attend.

But even if you can't make it to the meeting, please don't let that stand in your way of joining Majority '86.

If we can retain Republican control of the Senate next year, there's a good chance we'll be able to expand the "Reagan Revolution" well into the next century.

But if we lose our majority, all our efforts and achievements -- yours, mine and President Reagan's -- will have been in vain.

And I'm convinced the only way we'll hold on to our Senate majority is to recruit the maximum support of you and every other prominent Republican for Majority '86.

I look forward to seeing you at our April briefing. If you have any questions regarding the program, please call our Majority '86 hotline at 1-800-722-1188.

Sincerely,

John Heinz

Senator John Heinz
Chairman

P.S. Reservations for our April 15th meeting are strictly limited to ensure that each member has the opportunity to speak personally with our Senators, candidates and other special guests. Please return your Commitment Card with your first contribution of $1,000 by March 17th to reserve your place.

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JOHN HEINZ
UNITED STATES SENATE

April 9, 1986

Mrs. Deborah Dentzer
440 First Street, N.W.
Suite 600
Washington, DC 20001

Dear Mrs. Dentzer:

I am writing to you personally today to invite you to become a member of the most exclusive organization in the Republican Party - The Republican Senatorial Trust.

The Republican leadership in the United States Senate first established the Senatorial Trust back in 1977. And for nearly ten years now, the Trust has provided a forum for the free exchange of ideas between Republican Senators and individuals like yourself who are recognized business and community leaders.

These confidential off-the-record sessions (there are an average of five per year) are always followed by an intimate reception and dinner at such places as the White House, the Vice President's residence, a Senator's home or another prominent place in Washington.

There are a number of reasons why the Senatorial Trust has proven so successful. One reason is the caliber of people who are invited to join the Trust. Another reason is that Trust membership is strictly limited to 200 individuals and as a result, each Trust member is guaranteed the opportunity to share ideas and opinions directly with our Republican Senators.

From time to time, vacancies occur in the Trust. At this moment, we have 14 memberships available and I would be honored if you would accept my invitation to join the Trust.

Membership in the Senatorial Trust involves an annual commitment of $10,000.

Trust members may either contribute the full $10,000 to the Trust (which in turn is deposited in a

Not Printed at Government Expense

separate bank account and spent only in direct support of Republican Senate campaigns) or Trust members may allocate all or a portion of their Trust dues directly to the Senatorial candidates of their choice.

Trust members who choose this alternative method of payment are asked to consult the National Republican Senatorial Committee for counsel as to which candidates are in the greatest need of financial support.

After you select the candidates you want to support, you're asked to forward your candidate contributions to our Trust office here at the NRSC, and we'll in turn immediately send them to the candidates with an appropriate cover note.

If you would like to accept membership in the Trust, all you need to do is to check the enclosed reply form and return it to me.

For your information, you'll be interested to know that our next Trust event is scheduled for Wednesday, May 7th.

This meeting will focus on the ramifications of the newly-proposed tax legislation. In addition, you will be introduced to a number of Senators and Senatorial candidates. The day's activities will conclude with a private dinner party at my home in Georgetown.

If you have any questions, please don't hesitate to call the Trust Coordinator, Gracia Barker-Cross, at (202) 662-0677.

I am looking forward to hearing from you.

Sincerely,

John Heinz

John Heinz
Chairman

P.S. I'm reserving one Trust membership just for you, so please, I need to hear from you soon! J.

C 0 2 7 3 0 4 0

OFFICIAL BUSINESS 000054

NATIONAL REPUBLICAN SENATORIAL COMMITTEE

FROM: Senator John Heinz, Chairman

TO: Mr. John Wallace
39 H. V. Pahmas Del Har
Humacao, Puerto Rico 00661

Dispatch No.	00563973
Dispatch Date	06/23/86
Dispatch Time	2015
Operator	dhw
Return Requested By	JULY 23

Dear Mr. Wallace:

On September 27th, we have the opportunity to win the first and most important U.S. Senate race of 1986.

This incredible opportunity exists in Louisiana. And this is a race we must win ... because our entire strategy for maintaining our Senate majority hinges on capturing this seat.

Under Louisiana state law, if a candidate wins 50% plus one vote in the open primary on September 27th, that candidate is elected Senator. A general election is not held.

And right now survey research shows our candidate, Rep. Henson Moore, can win this critically important race but to do so he urgently needs help from the N.R.S.C. before July 23.

Picking up this open Democrat seat in September means much more than just a victory in Louisiana. Because to retain our majority we must protect all the seats we now hold in the South.

But more importantly, an early Republican defeat in Louisiana could build the momentum for the Democrats to sweep the entire region by launching an all-out attack on our Republican incumbents in Florida, Georgia and Alabama and our open seat in North Carolina.

Mr. Wallace, if the Democrats win these four seats, we will lose our majority ... because there is nowhere else in the country where we could make up such a devastating loss of Republican seats.

But we can win Louisiana -- and protect our southern imcumbents -- if we have the immediate help of you and every other concerned Senatorial Club member.

Our Republican candidate, Congressman Henson Moore, currently beats his Democrat opponent by a 16% margin.

This is remarkable for a Republican candidate in a state where 81% of the voters are registered as Democrats.

But in spite of Henson's impressive standing at this time, the overwhelming majority of Louisianans still consider themselves to be Democrats.

And Henson's lead could quickly disappear because his opponent has launched a massive state-wide media blitz.

That's why I must ask you to send a special contribution of $90 or $100 if you can today.

We must raise $282,500 for Republican Moore now to mount an unprecedented voter contact campaign to stop the Democrats from destroying his lead. And we must begin no later than July 23.

If you and every Senatorial Club member can help out today, we can give Henson Moore the tools he needs to launch an all-out campaign blitz in every corner of the state -- and make sure he maintains his lead right up to election day.

There is virtually no question if Henson can keep the loyalty of Louisiana Democrats now, he'll win on September 27th.

And by winning the Louisiana Senate seat, Henson Moore will also go a long way to saving our Senate Majority.

But please understand we must -- repeat must -- raise $282,500 in the next 30 days to win Louisiana.

The Louisiana Senate election is only 3 months away. Please send your emergency contribution right away.

Sincerely,

John Heinz

John Heinz
Chairman

P.S. Louisiana is the first and most important Senate race we have this year. If we don't win we stand to lose our majority. But polls clearly show that our candidate Henson Moore can win -- but to do so we must raise $282,500 by July 23. Please send your contribution for $90 or even $100 today. Thank you.

LOUISIANA PRIMARY EMERGENCY RESPONSE

000054

TO: Senator John Heinz

Dear Senator Heinz,

I understand why, if we don't win this early Senate election in Louisiana, we risk losing all four of our Senate seats in the South—and our entire Republican Majority!

I want to do everything I possibly can to help the Senatorial Committee raise the $282,500 we must give Henson Moore immediately if he is to win the Louisiana election on September 24th.

I've enclosed the most generous contribution I can for:

☐ $90 ☐ $100 ☐ $_____ Other

signature _____ F621 00563973

Mr. John Wallace
39 H. V. Pahmas Del Har
Humacao, Puerto Rico 00661

Please make your check payable to National Republican Senatorial Committee

PROCESS IMMEDIATELY:
Urgent Campaign
Contribution Enclosed

NO POSTAGE
NECESSARY
IF MAILED
IN THE
UNITED STATES

BUSINESS REPLY MAIL
FIRST CLASS PERMIT NO. 10782 WASHINGTON, D.C.

POSTAGE WILL BE PAID BY ADDRESSEE

National Republican Senatorial Committee
440 First Street, N.W., Suite 700
P.O. Box 2780
Washington, D.C. 20013

9204073704

National Republican Senatorial Committee
440 First Street, N.W. • Suite 700
Washington, D.C. 20001

SS OFFICIAL BUSINESS OFFICIAL BUSINESS OFF

NATIONAL REPUBLICAN SENATORIAL COMMITTEE

From the Office of the Executive Director
Tom C. Griscom

August 13, 1986

Mrs. Maria D. Gonzalez
2 Rubi St. Vis Verde
Mayaguez, PR 00708

Dear Mrs. Gonzalez,

Please look at the Confidential Memo I've enclosed for you immediately. It shows that one of our most important "open seat" races is facing serious funding problems.

And I need your assistance to help us win this campaign before it is too late.

As you can see, Jim Santini, our candidate for retiring Senator Paul Laxalt's seat, faces an immediate crisis. He is running far short of cash compared to his opponent, liberal Democrat Harry Reid.

In a state the size of Nevada this means big trouble. Campaign funds go much farther there. And the difference of only a few thousand dollars can make a big difference.

And as things stand now, Jim's Democrat opponent has $118,357 more than he has.

Mrs. Gonzalez I can't state this strongly enough: winning Nevada is essential to our overall plan of retaining a Republican Majority in the U.S. Senate.

If we are forced to play catch-up in Nevada now we will lose one of our most important open seats that we will be unable to pick up anywhere else.

That's why I must ask you as directly as I can for an immediate, emergency contribution of $100 or even $150 to help us win this all-important Senate seat.

As you'll see from reading this memo, the Santini race is a race we can win. Indeed, it is a race we must win if we are to have any chance of retaining our Senate Majority.

Please, send the most generous contribution you can today to help us win this critically important race.

Sincerely,

Tom Griscom

Tom Griscom
Executive Director

440 First Street, N.W., Suite 700 • Washington, D.C. 20001
Paid for and authorized by the National Republican Senatorial Committee.

CONFIDENTIAL

MEMO

AUGUST 1, 1986

TO: Tom Griscom

FROM: Scott Cottington, Political Director

RE: Critical Cash Shortfall in Nevada Jeopardizes Seat

CAMPAIGN OVERVIEW: Winning Nevada Essential to Our Majority

As you know from the NRSC Strategic Overview of 04/30/86, we must win Nevada to hang on to our majority. It is one of the 7 critical open seats up this year and we know we have to take it to offset any incumbent seat losses.

As you are also aware, we had expected this race to be tough and close - but winnable. We hadn't expected any major problems. But that's not true now.

UNEXPECTED DEMOCRAT FUNDRAISING STRENGTH PUTS SEAT IN JEOPARDY

Liberal Democrat Harry Reid has shown extraordinary strength and skill in raising money. So much skill in fact that he now has significantly more cash on hand than our candidate Jim Santini.

All of this was triggered by Reid's latest Federal Election Commission filing which showed him having raised $567,176.

In a sparsely populated state like Nevada this means big trouble. Campaign dollars go much farther there and this has given Reid an unexpectedly strong edge to his campaign.

SOLUTION: RAISE MORE FOR SANTINI OR WRITE THE SEAT OFF

There's only one solution to this problem. We must raise at least $250,000 to counter Reid immediately. If we don't, Reid will be able to build too strong a lead for us to overcome by election day.

Tom, this is our only way out, period. It's clear the Democrats have targeted this seat. And it's equally obvious that this race is going to turn into a slugging match.

There is no doubt in my mind that it is a race we can win but we must have the money to do the job. We have to be able to match Reid dollar for dollar.

Please advise A.S.A.P.

NATIONAL REPUBLICAN SENATORIAL COMMITTEE

Urgent Nevada Support Reply

TO: Tom Griscom, Executive Director

FROM: Mrs. Maria D. Gonzalez
2 Rubi St. Vis Verde
Mayaguez, PR 00708

H677 334147

Dear Tom,

I've read your letter and Scott's Confidential Memorandum. And I understand that we must win Nevada to hang on to our Senate Majority this year.

To make sure the Santini campaign has the funds it needs to defeat liberal Democrat Harry Reid, I'm enclosing the most generous contribution I can today for:

[ ] $100 [ ] $150 [ ] $_____ Other

Please make your check payable to the National Republican Senatorial Committee.

NO POSTAGE
NECESSARY
IF MAILED
IN THE
UNITED STATES

BUSINESS REPLY MAIL

FIRST CLASS PERMIT NO. 10782 WASHINGTON, D.C.

POSTAGE WILL BE PAID BY ADDRESSEE

Tom C. Griscom, Executive Director
National Republican Senatorial Committee
440 First Street, N.W., Suite 700
P.O. Box 2780
Washington, D.C. 20013

NATIONAL REPUBLICAN
SENATORIAL COMMITTEE

440 First Street, N.W., Suite 700 Washington, D.C. 20001

CRITICAL SENATE ELECTION
INFORMATION ENCLOSED

E

9220407307111

Attachment (E)

CARB-OUT

DE LUXE CHECK PRINTERS, INC.

TOP VOUCHER

NATIONAL REPUBLICAN
SENATORIAL COMMITTEE

DETACH AND RETAIN THIS STATEMENT
THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW.
IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT DESIRED.

DELUXE - FORM WVTO-3 V-2

DATE	DESCRIPTION	AMOUNT

2 0 0 4 0 7 3 2 7 1 2

24-08A106

NATIONAL REPUBLICAN SENATORIAL COMMITTEE
DIRECT TO PROGRAM
440 FIRST ST., N.W., SUITE 600
WASHINGTON, D.C. 20001

Bank of Virginia
8330 Boone Boulevard
Vienna, Virginia 22180

0593

68-408/560 405

_____ 19____

PAY _____ DOLLARS $_____

TO
THE
ORDER
OF

_____

⑈00000593⑈ ⑆056004089⑆ 652⑈00112451⑈

F

0 0 4 0 7 3 2 7 1 3

Dear Ms. [redacted]

I want to express my deepest gratitude, on behalf of Vice President Bush, for your generous response to his emergency letter.

Your contribution of $[redacted] was absolutely imperative if our Senate candidates in South Dakota, Nevada, Louisiana and California, were to continue the fight against their liberal Democrat opponents.

The Vice President had every confidence in your understanding of the debilitating consequences of a Democrat controlled Senate -- a frightening but definite possibility if we were to lose the races in these four critical states.

We still have a lot of work to do, and only a very short time to do it. But thanks to your help, we now stand a fighting chance of victory in November.

Again, thank you for your support!

Sincerely,

P.S. Since the Vice President wrote you, Democrats have increased flow of liberal dollars into key targeted states. Your extra support <u>today</u> is essential to save GOP majority. Please help!

8240737 14

Dear Ms. [redacted]

I want to express my deepest gratitude, on behalf of Vice President Bush, for your generous response to his emergency letter.

Your contribution of $[redacted] was absolutely imperative if our Senate candidates in South Dakota, Nevada, Louisiana and California, were to continue the fight against their liberal Democrat opponents.

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We still have a lot of work to do, and only a very short time to do it. But thanks to your help, we now stand a fighting chance of victory in November.

Again, thank you for your support!

Sincerely,

John Heinz

P.S. Since the Vice President wrote you, Democrats have increased their flow of liberal dollars into key targeted states. Your extra support <u>today</u> is essential to save the GOP majority. Please help!

Dear Ms. [redacted]

I want to express my deepest gratitude, on behalf of Vice President Bush, for your generous response to his emergency letter.

Your contribution of $[redacted] was absolutely imperative if our Senate candidates in Colorado, Alabama, Florida, and Missouri, were to continue the fight against their liberal Democrat opponents.

The Vice President had every confidence in your understanding of the debilitating consequences of a Democrat controlled Senate -- a frightening but definite possibility if we were to lose the races in these four critical states.

We still have a lot of work to do, and only a very short time to do it. But thanks to your help, we now stand a fighting chance of victory in November.

Again, thank you for your support!

Sincerely,

John Heinz

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Dear Ms. [redacted]

I want to express my deepest gratitude, on behalf of Vice President Bush, for your generous response to his emergency letter.

Your contribution of $[redacted] was absolutely imperative if our Senate candidates in Colorado, Alabama, Florida and Missouri, were to continue the fight against their liberal Democrat opponents.

The Vice President had every confidence in your understanding of the debilitating consequences of a Democrat controlled Senate -- a frightening but definite possibility if we were to lose the races in these four critical states.

We still have a lot of work to do, and only a very short time to do it. But thanks to your help, we now stand a fighting chance of victory in November.

Again, thank you for your support!

Sincerely,

John Heinz

Since the Vice President wrote you, Democrats have increased flow of liberal dollars into key targeted states. Your extra support today is essential to save GOP majority. Please help!

9204073717

Dear Ms. [redacted]

I want to express my deepest gratitude, on behalf of Vice President Bush, for your generous response to his emergency letter.

Your contribution of $[redacted] was absolutely imperative if our Senate candidates in South Dakota, Vermont, North Carolina and Nevada, were to continue the fight against their liberal Democrat opponents.

The Vice President had every confidence in your understanding of the debilitating consequences of a Democrat controlled Senate -- a frightening but definite possibility if we were to lose the races in these four critical states.

We still have a lot of work to do, and only a very short time to do it. But thanks to your help, we now stand a fighting chance of victory in November.

Again, thank you for your support!

Sincerely,

John Heinz

Since the Vice President wrote you, Democrats have increased their flow of liberal dollars into key targeted states. Your extra support <u>today</u> is essential to save the GOP majority. Please help!

C20407378

Dear Ms. [redacted]

I want to express my deepest gratitude, on behalf of Vice President Bush, for your generous response to his emergency letter.

Your contribution of $[redacted] was absolutely imperative if our Senate candidates in Vermont, North Carolina, South Dakota and Nevada, were to continue the fight against their liberal Democrat opponents.

The Vice President had every confidence in your understanding of the debilitating consequences of a Democrat controlled Senate -- a frightening but definite possibility if we were to lose the races in these four critical states.

We still have a lot of work to do, and only a very short time to do it. But thanks to your help, we now stand a fighting chance of victory in November.

Again, thank you for your support!

Sincerely,

John Heinz

P.S. Since the Vice President wrote you, Democrats have increased flow of liberal dollars into key targeted states. Your extra support <u>today</u> is essential to save GOP majority. Please help!

Dear Ms. [redacted]

I want to express my deepest gratitude, on behalf of Vice President Bush, for your generous response to his emergency letter.

Your contribution of $[redacted] was absolutely imperative if our Senate candidates in Arkansas, South Dakota, Georgia and Alabama, were to continue the fight against their liberal Democrat opponents.

The Vice President had every confidence in your understanding of the debilitating consequences of a Democrat controlled Senate -- a frightening but definite possibility if we were to lose the races in these four critical states.

We still have a lot of work to do, and only a very short time to do it. But thanks to your help, we now stand a fighting chance of victory in November.

Again, thank you for your support!

Sincerely,

John Heinz

P.S. Since the Vice President wrote you, Democrats have increased their flow of liberal dollars into key targeted states. Your extra support <u>today</u> is essential to save the GOP majority. Please help!

9274073721

Dear Ms. [redacted]

I want to express my deepest gratitude, on behalf of Vice President Bush, for your generous response to his emergency letter.

Your contribution of $[redacted] was absolutely imperative if our Senate candidates in South Dakota, Arkansas, Georgia, and Alabama, were to continue the fight against their liberal Democrat opponents.

The Vice President had every confidence in your understanding of the debilitating consequences of a Democrat controlled Senate -- a frightening but definite possibility if we were to lose the races in these four critical states.

We still have a lot of work to do, and only a very short time to do it. But thanks to your help, we now stand a fighting chance of victory in November.

Again, thank you for your support!

Sincerely,

John Heinz

Since the Vice President wrote you, Democrats have increased their flow of liberal dollars into key targeted states. Your extra support <u>today</u> is essential to save the GOP majority. Please help!

8 9 0 4 0 7 3 2 7 2 2

Dear Ms. [redacted]

I want to express my deepest gratitude, on behalf of Vice President Bush, for your generous response to his emergency letter.

Your contribution of $[redacted] was absolutely imperative if our Senate candidates were to continue the fight against their liberal Democrat opponents.

The Vice President had every confidence in your understanding of the debilitating consequences of a Democrat controlled Senate -- a frightening but definite possibility if we were to lose the races in our most critical states.

We still have a lot of work to do, and only a very short time to do it. But thanks to your help, we now stand a fighting chance of victory in November.

Again, thank you for your support!

Sincerely,

P.S. Since the Vice President wrote you, Democrats have increased flow of liberal dollars into key targeted states. Your extra support <u>today</u> is essential to save GOP majority. Please help!

SENATOR JOHN HEINZ
CHAIRMAN

TOM GRISCOM
EXECUTIVE DIRECTOR

National Republican Senatorial Committee

Direct-To Program Agreement

The Direct-to Program is an effort organized by Sen. John Heinz and the National Republican Senatorial Committee for the general election benefit of individual candidates. Individual contributors from the NRSC's masterfile will be able to earmark contributions for a specific Senate general election campaign. Most Direct-to participants will be contributing individual amounts of $100 or more.

By law, the NRSC is allowed to contribute approximately $11 million to candidates through coordinated dollars. To maintain a Republican majority in 1986, Republican candidates will need more help. The NRSC's Direct-to Program allows individual contributors to specifically name a campaign (or campaigns) as the "earmarked " recipient(s) of a contribution. In this manner, the NRSC hopes that additional money can be made available to Senate general election candidates.

Money received through the Direct-to Program can only be deposited in the campaign's general election account and is to be used exclusively for the general election campaign. Each earmarked contribution must be applied against the contributor's limit to the campaign's general election. All Direct-to money is sent to the campaign through the NRSC. Although the NRSC will send a thank you letter to each of the contributors, a separate letter from the campaign to the contributor would be appreciated and will help establish a pattern of communication that will aid in resolicitation.

One person on the NRSC staff will serve as an information source for campaigns and in-house staff concerning Direct-to matters. Dina Beaumont will serve initially in this capacity, and can be reached at (202) 347-0202. Her responsibilities will include:

* Serve as liaison between the Direct-to Program and campaigns.
* Advise and assist campaigns with Direct-to concerns.
* Work with campaigns to verify adequate record-keeping and FEC compliance concerning the Direct-to money to campaigns.
* Announce the receipt of incoming Direct-to money by campaigns.
* Follow-up thank you notes from campaigns.

440 First Street, N.W. ■ Suite 600 ■ Washington, D.C. 20001 ■ (202) 347-0202 ■ (202) 224-2351

Paid for and authorized by the National Republican Senatorial Committee

8904073725

To alleviate confusion, Dina will be the only NRSC staff member announcing Direct-to contributions to campaigns.

Federal Election Law requires that a campaign must assume the direct fundraising costs associated with an effort such as the Direct-to Program. Participating campaigns will be billed on a monthly basis on the 10th of each month for money directed in the previous calendar month. Campaigns will be charged on a 'per contributor' basis, with the actual charge determined by the direct fundraising costs associated with a particular mailing/event. (The per contributor charge will be in the $3-$4 range.) Payment will be due from the campaign's general election account thirty days from the date of invoice.

To assist NRSC and campaign compliance with the Federal Election Campaign Act, up to five percent (5%) of the NRSC's maximum coordinated expenditure on behalf of a state will be escrowed until October 20 of the election year. If all payments have been made for the Direct-to Program, all coordinated money will be available for varied uses (i.e., media, mailings, office support). If payments have not been made, the escrowed coordinated money will be used to pay the campaign's invoiced portion of the direct costs associated with the Direct-to Program.

On behalf of the Arlen Specter campaign, I hereby acknowledge receipt of the above information pertaining to the NRSC's Direct-to Program and the _____ campaign's participation in the program.

J C Hadley 6/28/86
(NRSC representative) (date)

[signature] Campaign Director
(signature) (title)

June 17 1986
(date)

8 9 2 4 0 7 3 2 7 2 6

To alleviate confusion, Dina will be the only NRSC staff member announcing Direct-to contributions to campaigns.

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On behalf of the Henson Moore Election Committee campaign, I hereby acknowledge receipt of the above information pertaining to the NRSC's Direct-to Program and the Henson Moore Election Committee campaign's participation in the program.

(NRSC representative) (date)

R. Jerry Kenlaw - Campaign Manager
(signature) (title)

June 6, 1984
(date)

3 2 7 4 0 7 3 2 7 2 7

To alleviate confusion, Dina will be the only NRSC staff member announcing Direct-to contributions to campaigns.

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To assist NRSC and campaign compliance with the Federal Election Campaign Act, up to five percent (5%) of the NRSC's maximum coordinated expenditure on behalf of a state will be escrowed until October 20 of the election year. If all payments have been made for the Direct-to Program, all coordinated money will be available for varied uses (i.e., media, mailings, office support). If payments have not been made, the escrowed coordinated money will be used to pay the campaign's invoiced portion of the direct costs associated with the Direct-to Program.

On behalf of the Koehler for Senate campaign, I hereby acknowledge receipt of the above information pertaining to the NRSC's Direct-to Program and the Koehler campaign's participation in the program.

Scott Stringer

(NRSC representative) (date)

Fred J Nelson campaign manager

(signature) (title)

6/19/86

(date)

9204073728

To alleviate confusion, Dina will be the only NRSC staff member announcing Direct-to contributions to campaigns.

Federal Election Law requires that a campaign must assume the direct fundraising costs associated with an effort such as the Direct-to Program. Participating campaigns will be billed on a monthly basis on the 10th of each month for money directed in the previous calendar month. Campaigns will be charged on a 'per contributor' basis, with the actual charge determined by the direct fundraising costs associated with a particular mailing/event. (The per contributor charge will be in the $3-$4 range.) Payment will be due from the campaign's general election account thirty days from the date of invoice.

To assist NRSC and campaign compliance with the Federal Election Campaign Act, up to five percent (5%) of the NRSC's maximum coordinated expenditure on behalf of a state will be escrowed until October 20 of the election year. If all payments have been made for the Direct-to Program, all coordinated money will be available for varied uses (i.e., media, mailings, office support). If payments have not been made, the escrowed coordinated money will be used to pay the campaign's invoiced portion of the direct costs associated with the Direct-to Program.

On behalf of the SENATOR SLADE GORTON '86 COMMITTEE campaign, I hereby acknowledge receipt of the above information pertaining to the NRSC's Direct-to Program and the SENATOR SLADE GORTON '86 COMMITTEE campaign's participation in the program.

Scott Gorton

(NRSC representative) (date)

Helen Rasmussen CAMPAIGN MANAGER

(signature) (title)

6/23/86

(date)

0 0 0 4 0 7 3 2 7 2 9

To alleviate confusion, Dina will be the only NRSC staff member announcing Direct-to contributions to campaigns.

Federal Election Law requires that a campaign must assume the direct fundraising costs associated with an effort such as the Direct-to Program. Participating campaigns will be billed on a monthly basis on the 10th of each month for money directed in the previous calendar month. Campaigns will be charged on a 'per contributor' basis, with the actual charge determined by the direct fundraising costs associated with a particular mailing/event. (The per contributor charge will be in the $3-$4 range.) Payment will be due from the campaign's general election account thirty days from the date of invoice.

To assist NRSC and campaign compliance with the Federal Election Campaign Act, up to five percent (5%) of the NRSC's maximum coordinated expenditure on behalf of a state will be escrowed until October 20 of the election year. If all payments have been made for the Direct-to Program, all coordinated money will be available for varied uses (i.e., media, mailings, office support). If payments have not been made, the escrowed coordinated money will be used to pay the campaign's invoiced portion of the direct costs associated with the Direct-to Program.

On behalf of the Kramer for Senate campaign, I hereby acknowledge receipt of the above information pertaining to the NRSC's Direct-to Program and the _____ campaign's participation in the program.

6/12/86

(NRSC representative) (date) (signature) (title)

6/11/86

(date)

o alleviate confusion, Dina will be the only NRSC staff member announcing Direct-To contributions to campaigns.

Federal Election Law requires that a campaign must assume the Direct fundraising costs associated with an effort such as the Direct-To Program. Participating campaigns will be billed on a monthly basis on the 10th of each month for money directed in the previous calendar month. Campaigns will be charged on a 'per contributor' basis, with the actual charge determined by the direct fundraising costs associated with a particular mailing/event. (The per contributor charge will be in the $3-$4 range.) Payment will be due from the campaign thirty days from the date of invoice.

To assist NRSC and campaign compliance with the Federal Election Campaign Act, up to five percent (5%) of the NRSC's maximum coordinated expenditure on behalf of a state will be escrowed until October 20 of the election year. If all payments have been made for the Direct-To Program, all coordinated money will be available for varied uses (i.e., media, mailings, office support). If payments have not been made, the escrowed coordinated money will be used to pay the campaign's invoiced portion of the direct costs associated with the Direct-To Program.

On behalf of the Snelling '86 campaign, I hereby acknowledge receipt of the above information pertaining to the NRSC's Direct-To Program and the Snelling, IV campaign's participation in the program.

James E. Nicholson 1/23/86 — Duncan L. Boone, Treasurer

(NRSC representative) (date) (signature) (title)

1/14/86

(date)

0 0 0 4 0 7 3 7 3 1

To alleviate confusion, Dina will be the only NRSC staff member announcing Direct-to contributions to campaigns.

Federal Election Law requires that a campaign must assume the direct fundraising costs associated with an effort such as the Direct-to Program. Participating campaigns will be billed on a monthly basis on the 10th of each month for money directed in the previous calendar month. Campaigns will be charged on a 'per contributor' basis, with the actual charge determined by the direct fundraising costs associated with a particular mailing/event. (The per contributor charge will be in the $3-$4 range.) Payment will be due from the campaign's general election account thirty days from the date of invoice.

To assist NRSC and campaign compliance with the Federal Election Campaign Act, up to five percent (5%) of the NRSC's maximum coordinated expenditure on behalf of a state will be escrowed until October 20 of the election year. If all payments have been made for the Direct-to Program, all coordinated money will be available for varied uses (i.e., media, mailings, office support). If payments have not been made, the escrowed coordinated money will be used to pay the campaign's invoiced portion of the direct costs associated with the Direct-to Program.

On behalf of the McMASTER campaign, I hereby acknowledge receipt of the above information pertaining to the NRSC's Direct-to Program and the McMASTER campaign's participation in the program.

(NRSC representative) (date)

(signature)

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To alleviate confusion, Dina will be the only NRSC staff member announcing Direct-to contributions to campaigns.

Federal Election Law requires that a campaign must assume the direct fundraising costs associated with an effort such as the Direct-to Program. Participating campaigns will be billed on a monthly basis on the 10th of each month for money directed in the previous calendar month. Campaigns will be charged on a 'per contributor' basis, with the actual charge determined by the direct fundraising costs associated with a particular mailing/event. (The per contributor charge will be in the $3-$4 range.) Payment will be due from the campaign's general election account thirty days from the date of invoice.

To assist NRSC and campaign compliance with the Federal Election Campaign Act, up to five percent (5%) of the NRSC's maximum coordinated expenditure on behalf of a state will be escrowed until October 20 of the election year. If all payments have been made for the Direct-to Program, all coordinated money will be available for varied uses (i.e., media, mailings, office support). If payments have not been made, the escrowed coordinated money will be used to pay the campaign's invoiced portion of the direct costs associated with the Direct-to Program.

On behalf of the Rudman For Senate Committee campaign, I hereby acknowledge receipt of the above information pertaining to the NRSC's Direct-to Program and the _____ campaign's participation in the program.

_____ G. Allen Gallagher A.A

(NRSC representative) (date) (signature) (title)

1/27/86

(date)

0 0 0 4 2 7 3 2 7 3 5

To alleviate confusion, Dina will be the only NRSC staff member announcing Direct-to contributions to campaigns.

Federal Election Law requires that a campaign must assume the direct fundraising costs associated with an effort such as the Direct-to Program. Participating campaigns will be billed on a monthly basis on the 10th of each month for money directed in the previous calendar month. Campaigns will be charged on a 'per contributor' basis, with the actual charge determined by the direct fundraising costs associated with a particular mailing/event. (The per contributor charge will be in the $3-$4 range.) Payment will be due from the campaign's general election account thirty days from the date of invoice.

To assist NRSC and campaign compliance with the Federal Election Campaign Act, up to five percent (5%) of the NRSC's maximum coordinated expenditure on behalf of a state will be escrowed until October 20 of the election year. If all payments have been made for the Direct-to Program, all coordinated money will be available for varied uses (i.e., media, mailings, office support). If payments have not been made, the escrowed coordinated money will be used to pay the campaign's invoiced portion of the direct costs associated with the Direct-to Program.

On behalf of the Missourians for Kit Bond campaign, I hereby acknowledge receipt of the above information pertaining to the NRSC's Direct-to Program and the Missourians for Kit Bond campaign's participation in the program.

12/13/85 Emily J. Reynolds

(NRSC representative) (date) (signature) (title)

Finance Director

December 22, 1985

(date)

0040073734

To alleviate confusion, Dina will be the only NRSC staff member announcing Direct-to contributions to campaigns.

Federal Election Law requires that a campaign must assume the direct fundraising costs associated with an effort such as the Direct-to Program. Participating campaigns will be billed on a monthly basis on the 10th of each month for money directed in the previous calendar month. Campaigns will be charged on a 'per contributor' basis, with the actual charge determined by the direct fundraising costs associated with a particular mailing/event. (The per contributor charge will be in the $3-$4 range.) Payment will be due from the campaign's general election account thirty days from the date of invoice.

To assist NRSC and campaign compliance with the Federal Election Campaign Act, up to five percent (5%) of the NRSC's maximum coordinated expenditure on behalf of a state will be escrowed until October 20 of the election year. If all payments have been made for the Direct-to Program, all coordinated money will be available for varied uses (i.e., media, mailings, office support). If payments have not been made, the escrowed coordinated money will be used to pay the campaign's invoiced portion of the direct costs associated with the Direct-to Program.

On behalf of the Kindness for Senate campaign, I hereby acknowledge receipt of the above information pertaining to the NRSC's Direct-to Program and the Kindness campaign's participation in the program.

1/10/86 — (NRSC representative) (date)

Jean M. Curtis Campaign Mgr — (signature) (title)

1/10/86 — (date)

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To assist NRSC and campaign compliance with the Federal Election Campaign Act, up to five percent (5%) of the NRSC's maximum coordinated expenditure on behalf of a state will be escrowed until October 20 of the election year. If all payments have been made for the Direct-to Program, all coordinated money will be available for varied uses (i.e., media, mailings, office support). If payments have not been made, the escrowed coordinated money will be used to pay the campaign's invoiced portion of the direct costs associated with the Direct-to Program.

On behalf of the PAULA HAWKINS campaign, I hereby acknowledge receipt of the above information pertaining to the NRSC's Direct-to Program and the HAWKINS campaign's participation in the program.

_____ James J. Thorn, Administrative Assistant

(NRSC representative) (date) (signature) (title)

December 13, 1985

(date)

To alleviate confusion, Dina will be the only NRSC staff member announcing Direct-to contributions to campaigns.

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To assist NRSC and campaign compliance with the Federal Election Campaign Act, up to five percent (5%) of the NRSC's maximum coordinated expenditure on behalf of a state will be escrowed until October 20 of the election year. If all payments have been made for the Direct-to Program, all coordinated money will be available for varied uses (i.e., media, mailings, office support). If payments have not been made, the escrowed coordinated money will be used to pay the campaign's invoiced portion of the direct costs associated with the Direct-to Program.

On behalf of the GARN campaign, I hereby acknowledge receipt of the above information pertaining to the NRSC's Direct-to Program and the _____ campaign's participation in the program.

12/13/85 Manager

(NRSC representative) (date) (signature) (title)

1-23-86

(date)

To alleviate confusion, Dina will be the only NRSC staff member announcing Direct-to contributions to campaigns.

Federal Election Law requires that a campaign must assume the direct fundraising costs associated with an effort such as the Direct-to Program. Participating campaigns will be billed on a monthly basis on the 10th of each month for money directed in the previous calendar month. Campaigns will be charged on a 'per contributor' basis, with the actual charge determined by the direct fundraising costs associated with a particular mailing/event. (The per contributor charge will be in the $3-$4 range.) Payment will be due from the campaign's general election account thirty days from the date of invoice.

To assist NRSC and campaign compliance with the Federal Election Campaign Act, up to five percent (5%) of the NRSC's maximum coordinated expenditure on behalf of a state will be escrowed until October 20 of the election year. If all payments have been made for the Direct-to Program, all coordinated money will be available for varied uses (i.e., media, mailings, office support). If payments have not been made, the escrowed coordinated money will be used to pay the campaign's invoiced portion of the direct costs associated with the Direct-to Program.

On behalf of the Friends of Mattingly campaign, I hereby acknowledge receipt of the above information pertaining to the NRSC's Direct-to Program and the Friends of Mattingly campaign's participation in the program.

12/13/85 Robert Heckman, Manager

(NRSC representative) (date) (signature) (title)

1-20-86

(date)

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On behalf of the Missourians for Kit Bond campaign, I hereby acknowledge receipt of the above information pertaining to the NRSC's Direct-to Program and the Missourians for Kit Bond campaign's participation in the program.

12/13/85 Emily J. Reynolds

(NRSC representative) (date) (signature) (title)

Finance Director

December 22, 1985

(date)

To alleviate confusion, Dina will be the only NRSC staff member announcing Direct-to contributions to campaigns.

Federal Election Law requires that a campaign must assume the direct fundraising costs associated with an effort such as the Direct-to Program. Participating campaigns will be billed on a monthly basis on the 10th of each month for money directed in the previous calendar month. Campaigns will be charged on a 'per contributor' basis, with the actual charge determined by the direct fundraising costs associated with a particular mailing/event. (The per contributor charge will be in the $3-$4 range.) Payment will be due from the campaign's general election account thirty days from the date of invoice.

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On behalf of the Denton for Senate campaign, I hereby acknowledge receipt of the above information pertaining to the NRSC's Direct-to Program and the _____ campaign's participation in the program.

12/13/85 _____

(NRSC representative) (date) (signature) (title)

12/13/85

(date)

9204073740

To alleviate confusion, Dina will be the only NRSC staff member announcing Direct-to contributions to campaigns.

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To assist NRSC and campaign compliance with the Federal Election Campaign Act, up to five percent (5%) of the NRSC's maximum coordinated expenditure on behalf of a state will be escrowed until October 20 of the election year. If all payments have been made for the Direct-to Program, all coordinated money will be available for varied uses (i.e., media, mailings, office support). If payments have not been made, the escrowed coordinated money will be used to pay the campaign's invoiced portion of the direct costs associated with the Direct-to Program.

On behalf of the Nickles for Senate campaign, I hereby acknowledge receipt of the above information pertaining to the NRSC's Direct-to Program and the Nickles for Senate campaign's participation in the program.

12/13/85 — Campaign Manager

(NRSC representative) (date) (signature) (title)

12/13/85

(date)

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To alleviate confusion, Dina will be the only NRSC staff member announcing Direct-to contributions to campaigns.

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On behalf of the John McCain for Senate campaign, I hereby acknowledge receipt of the above information pertaining to the NRSC's Direct-to Program and the McCain campaign's participation in the program.

12/13/85 Campaign Director

(NRSC representative) (date) (signature) (title)

1/24/86

(date)

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To alleviate confusion, Dina will be the only NRSC staff member announcing Direct-to contributions to campaigns.

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On behalf of the Friends of Mathews campaign, I hereby acknowledge receipt of the above information pertaining to the NRSC's Direct-to Program and the Friends of Mathews campaign's participation in the program.

12/13/85 Robert Nelson, Manager

(NRSC representative) (date) (signature) (title)

1-20-86

(date)

9204073027443

To alleviate confusion, Dina will be the only NRSC staff member announcing Direct-to contributions to campaigns.

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To assist NRSC and campaign compliance with the Federal Election Campaign Act, up to five percent (5%) of the NRSC's maximum coordinated expenditure on behalf of a state will be escrowed until October 20 of the election year. If all payments have been made for the Direct-to Program, all coordinated money will be available for varied uses (i.e., media, mailings, office support). If payments have not been made, the escrowed coordinated money will be used to pay the campaign's invoiced portion of the direct costs associated with the Direct-to Program.

On behalf of the ANDREWS FOR SENATE campaign, I hereby acknowledge receipt of the above information pertaining to the NRSC's Direct-to Program and the ANDREWS FOR SENATE campaign's participation in the program.

(NRSC representative) (date)	(signature) (title)
9/17/86	9/17/86
	(date)

0004073274

To alleviate confusion, Dina will be the only NRSC staff member announcing Direct-to contributions to campaigns.

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To assist NRSC and campaign compliance with the Federal Election Campaign Act, up to five percent (5%) of the NRSC's maximum coordinated expenditure on behalf of a state will be escrowed until October 20 of the election year. If all payments have been made for the Direct-to Program, all coordinated money will be available for varied uses (i.e., media, mailings, office support). If payments have not been made, the escrowed coordinated money will be used to pay the campaign's invoiced portion of the direct costs associated with the Direct-to Program.

On behalf of the QUAYLE for SENATE campaign, I hereby acknowledge receipt of the above information pertaining to the NRSC's Direct-to Program and the QUAYLE for SENATE campaign's participation in the program.

Scott Allegra

(NRSC representative) (date)

(signature) (title)

2/26/86

(date)

To alleviate confusion, Dina will be the only NRSC staff member announcing Direct-to contributions to campaigns.

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On behalf of the Dole for Senate campaign, I hereby acknowledge receipt of the above information pertaining to the NRSC's Direct-to Program and the Dole for Senate campaign's participation in the program.

[illegible] 8/26/86
(NRSC representative) (date)

Carol A. Bell
(signature)

Campaign Coordinator
(title)

8-26-86
(date)

0007374 6

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On behalf of the EDDY for U.S. SENATE campaign, I hereby acknowledge receipt of the above information pertaining to the NRSC's Direct-to Program and the EDDY for U.S. SENATE campaign's participation in the program.

8/25/82

(NRSC representative) (date)

(signature) (title)

JOSIN L. SHEPARD

8/12/82

(date)

82407347

To alleviate confusion, Dina will be the only NRSC staff member announcing Direct-to contributions to campaigns.

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On behalf of the [illegible] campaign, I hereby acknowledge receipt of the above information pertaining to the NRSC's Direct-to Program and the [illegible] campaign's participation in the program.

Kevin Talley (usm) 8/13/86

(NRSC representative) (date)

[illegible]

(signature) (title)

Manager

8/14/86

(date)

To alleviate confusion, Dina will be the only NRSC staff member announcing Direct-to contributions to campaigns.

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On behalf of the Grassley campaign, I hereby acknowledge receipt of the above information pertaining to the NRSC's Direct-to Program and the Grassley campaign's participation in the program.

Kevin Talley 8/12/86 MAM
(NRSC representative) (date)

Robert Bass Campaign Manager
(signature) (title)

8-5-86
(date)

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lleviate confusion, Dina will be the only NRSC staff member nouncing Direct-to contributions to campaigns.

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To assist NRSC and campaign compliance with the Federal Election Campaign Act, up to five percent (5%) of the NRSC's maximum coordinated expenditure on behalf of a state will be escrowed until October 20 of the election year. If all payments have been made for the Direct-to Program, all coordinated money will be available for varied uses (i.e., media, mailings, office support). If payments have not been made, the escrowed coordinated money will be used to pay the campaign's invoiced portion of the direct costs associated with the Direct-to Program.

On behalf of the JIM BUNNING FOR SENATE campaign, I hereby acknowledge receipt of the above information pertaining to the NRSC's Direct-to Program and the _____ campaign's participation in the program.

Scott Livingston — (NRSC representative)

5/23/86 — (date)

Jim T. Lutheran — (signature)

CAMPAIGN MANAGER — (title)

5/23/86 — (date)

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On behalf of the KASTEN FOR SENATE campaign, I hereby acknowledge receipt of the above information pertaining to the NRSC's Direct-to Program and the KASTEN FOR SENATE campaign's participation in the program.

_____ _____ ASST. TREAS

(NRSC representative) (date) (signature) (title)

1/20/86

(date)

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To alleviate confusion, Dina will be the only NRSC staff member announcing Direct-to contributions to campaigns.

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On behalf of the D'Amato campaign, I hereby acknowledge receipt of the above information pertaining to the NRSC's Direct-to Program and the D'Amato campaign's participation in the program.

James E. Lyons Jr. 3/14/86 — Rob D'Amato Campaign Director

(NRSC representative) (date) (signature) (title)

2/28/86

(date)

8 9 0 4 0 7 3 2 7 5 2

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To assist NRSC and campaign compliance with the Federal Election Campaign Act, up to five percent (5%) of the NRSC's maximum coordinated expenditure on behalf of a state will be escrowed until October 20 of the election year. If all payments have been made for the Direct-to Program, all coordinated money will be available for varied uses (i.e., media, mailings, office support). If payments have not been made, the escrowed coordinated money will be used to pay the campaign's invoiced portion of the direct costs associated with the Direct-to Program.

On behalf of the People for Mark Andrews Comm. campaign, I hereby acknowledge receipt of the above information pertaining to the NRSC's Direct-to Program and the Andrews campaign's participation in the program.

Scott [illegible]
(NRSC representative) (date)

x Jacqueline Pulk-Tusa, Administrator
(signature) (title) Assistant

February 17-86
(date)

3224073275 3

avoid confusion, Dina will be the only NRSC staff member [illegible] Direct-to contributions to campaigns.

Federal Election Law requires that a campaign must assume the direct fundraising costs associated with an effort such as the Direct-to Program. Participating campaigns will be billed on a monthly basis on the 10th of each month for money directed in the previous calendar month. Campaigns will be charged on a 'per contributor' basis, with the actual charge determined by the direct fundraising costs associated with a particular mailing/event. (The per contributor charge will be in the $3-$4 range.) Payment will be due from the campaign's general election account thirty days from the date of invoice.

To assist NRSC and campaign compliance with the Federal Election Campaign Act, up to five percent (5%) of the NRSC's maximum coordinated expenditure on behalf of a state will be escrowed until October 20 of the election year. If all payments have been made for the Direct-to Program, all coordinated money will be available for varied uses (i.e., media, mailings, office support). If payments have not been made, the escrowed coordinated money will be used to pay the campaign's invoiced portion of the direct costs associated with the Direct-to Program.

On behalf of the Symms for Senate campaign, I hereby acknowledge receipt of the above information pertaining to the NRSC's Direct-to Program and the Symms campaign's participation in the program.

Kay Colleyo

(RSC representative) (date)

Steve Symms

(signature) (title)

February 14, 1986

(date)

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SENATOR JOHN HEINZ
CHAIRMAN

TOM GRISCOM
EXECUTIVE DIRECTOR

National Republican Senatorial Committee

Invoice Date 11/15/86 Invoice Number 302

Candidate Committee: Broyhill for Senate

Post Office Box 29532

Greensboro, NC 27429

"Direct To Program"/Bush Mailings

*Charges for Period of October 1, 1986 to November 7, 1986

Amount directed for the period $61077.27

48 Contributors at $3.00 each = $144.00
Direct To

1788 Contributors at ¢33. each = $590.04
Bush Mailing

PAST DUE BILLINGS:
1) #266 9/1/86 - 9/30/86 Amount Due $2214.00
2)
3)
4)

TOTAL: $2948.04
(Please pay this amount)

Payable upon receipt. Please make checks payable to the National Republican Senatorial Committee. ATTN: Dina Beaumont.

*There will be no further Direct To charges from the NRSC. This is your final bill!

440 First Street, N.W. • Suite 600 • Washington, D.C. 20001 • (202) 347-0202 • (202) 224-2351

Paid for and authorized by the National Republican Senatorial Committee.

9204073756

SENATOR JOHN HEINZ
CHAIRMAN

TOM GRISCOM
EXECUTIVE DIRECTOR

National Republican Senatorial Committee

September 26, 1986

Mr. Kim T. Hutchens
Broyhill for Senate
Post Office Box 18532
Greensboro, NC 27429

Dear Kim:

Senator John Heinz has asked me to forward the following check to Senator James Broyhill's campaign to help maintain a Republican majority in 1986.

This contribution was made available through the NRSC "Direct-to" Program, pursuant to the instructions of each individual contributor. This effort allows the NRSC to forward designated contributions directly to Senator James Broyhill's campaign.

As outlined in Section 110.6 (c) (2) of the Federal Election Campaign Act, I have enclosed all information for the referenced contributions for which we have served as conduit. Federal Election Law requires that the Broyhill for Senate Committee include all this information in the next FEC report.

This money can only be deposited in the Broyhill for Senate Committee general election account and is to be used exclusively to help Senator Broyhill in his general election. It is important to note that this contribution must be applied against the contributor's limit to your general election campaign.

If you have any questions please contact Dina Beaumont at (202) 347-0202. Thank you.

Sincerely,

Maryanne E. Preztunik
Comptroller

P.S. We would appreciate it if the Broyhill for Senate Committee would send a seperate thank you note to each contributor.

440 FIRST STREET, N.W. • SUITE 600 • WASHINGTON, D.C. 20001 • (202) 347-0202 • (202) 224-2351

PAID FOR AND AUTHORIZED BY THE NATIONAL REPUBLICAN SENATORIAL COMMITTEE

82704737

SENATOR JOHN HEINZ
CHAIRMAN

TOM GRISCOM
EXECUTIVE DIRECTOR

National Republican Senatorial Committee

September 26, 1986

Senator James Broyhill
Broyhill for Senate
Post Office Box 18532
Greensboro, NC 27429

Dear James,

This letter is to officially notify you that today $8,142.51 in "Direct To" contributions were sent through the NRSC directly to your campaign.

This money is being forwarded to your campaign pursuant to the instruction of individual contributors, with the clear understanding that it's to be used only for your general election campaign effort.

James, I'm personally committed to doing everything I can to ensure your re-election to the U.S. Senate.

And I want you to rest assured that my efforts to provide your campaign with meaningful and useful campaign support will continue right up to election day.

Sincerely,

John Heinz

440 FIRST STREET, N.W. ■ SUITE 600 ■ WASHINGTON, D.C. 20001 ■ (202) 347-0202 ■ (202) 224-2351

PAID FOR AND AUTHORIZED BY THE NATIONAL REPUBLICAN SENATORIAL COMMITTEE

C00427758

NATIONAL REPUBLICAN
SENATORIAL COMMITTEE

DELUXE - FORM WVTO-3 V-2

DATE	DESCRIPTION	AMOUNT
9/26/86	Earmarked Contribution through NRSC Direct-To Program (See Attached List)	$8,142.51

NATIONAL REPUBLICAN SENATORIAL COMMITTEE
DIRECT TO PROGRAM
440 FIRST ST., N.W., SUITE 600
WASHINGTON, D.C. 20001

Bank of Virginia
1710 Goodridge Drive
McLean, Virginia 22102

0495

September 26, 19 86

68-408/560 405

PAY Eight Thousand One Hundred Forty-Two Dollars and 51/100 * * * DOLLARS $ 8,142.51

TO THE ORDER OF
Broyhill for Senate
General Election
Post Office Box 29532
Greensboro, NC 27429

NOT NEGOTIABLE

⑈00000495⑈ ⑆056004089⑆ 652⑈00112451⑈

SCHEDULE A — ITEMIZED RECEIPTS — LINE NUMBER 11A
PERIOD: FROM 09/25/86 TO 09/25/86 — PAGE _____ OF _____

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--- MEMO ENTRY ---

CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Neal Jr. , W. T. Rural Route 1, Box 138 Brewton, AL 36426 RECEIPT FOR: GENERAL	T.R. Miller Mill Co. INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/16/86	09/25/86	$ 76.25 NRSC CHECK
Nelson , A. C. Rural Route 3, Box 2 DuBois, PA 15801 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 6.25 NRSC CHECK
Walsh , C. S 220 El Bravo Way Palm Beach, FL 33480 RECEIPT FOR: GENERAL	Waterman Steamship Ca Chairman of Board AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 60.00 NRSC CHECK
Bromfield , M. C. 14213 East Marina Drive Aurora, CO 80014 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 25.00 NRSC CHECK
Fulton , Cyrus L. 127 West Wheeling Street Lancaster, OH 43130 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 30.00 NRSC CHECK
Espinoso , J. Haloway 231 San Angelo Boulevard San Antonio, TX 78212 RECEIPT FOR: GENERAL	114000094669121 Retired AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 12.50 NRSC CHECK

PAGE TOTAL: $ 210.00 (MEMO)

SCHEDULE A — ITEMIZED RECEIPTS — LINE NUMBER 11A

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Faulk , R. T. 1404 Forsythe Avenue Monroe, LA 71201 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 30.00 NRSC CHECK
Seidensticker , L. W. Post Office Box 1337 San Bruno, CA 94066 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 30.00 NRSC CHECK
Blount , H. E. Post Office Box 2 Philadelphia, MS 39350 RECEIPT FOR: GENERAL	INFORMATION REQUESTED Farmer AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 30.00 NRSC CHECK
Beauchamp , J. V. 3705 46th Street Lubbock, TX 79413 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 30.00 NRSC CHECK
Stewart , J. B. 1607 Shell Midland, TX 79705 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/16/86	09/25/86	$ 30.00 NRSC CHECK
Hale , W. C. 534 West 2nd North Street Morristown, TN 37814 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 6.25 NRSC CHECK

PAGE TOTAL: $ 156.25 (MEMO)

SCHEDULE A — ITEMIZED RECEIPTS — LINE NUMBER 11A

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Kapin , Herbert R. 901 El Dorado Street Fullerton, CA 92632 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 6.25 NRSC CHECK
Saldana , Jorge Post Office Box 1786 Old San Juan, PR 00903 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 30.00 NRSC CHECK
Dimick , Frederick W. 8343 Placita Prado Tucson, AZ 85710 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 10.00 NRSC CHECK
Drielsma , William F. 24 Dawson Drive West Caldwell, NJ 07006 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 6.25 NRSC CHECK
Workman , T. A. 3300 Marquette Dallas, TX 75225 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/25/86	09/25/86	$ 25.00 NRSC CHECK
Converse , H. I. Post Office Box 66 Mutual, OK 73853 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 17.50 NRSC CHECK

PAGE TOTAL: $ 95.00 (MEMO)

SCHEDULE A — ITEMIZED RECEIPTS — LINE NUMBER 11A

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Davis , W. K. Post Office Box 1322 Fairhope, AL 36533 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 30.00 NRSC CHECK
Christenson , Verne S. 514 Fourth Street Tephyrhills, FL 34248 RECEIPT FOR: GENERAL	INFORMATION REQUESTED Retired AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 12.50 NRSC CHECK
Feuer , Martha S 11 Cherrywood Dr. East Northport, NY 11731 RECEIPT FOR: GENERAL	INFORMATION REQUESTED Rn AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 7.50 NRSC CHECK
Jones , R. B. Post Office Box 455 Plains, TX 79355 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 30.00 NRSC CHECK
Golden , Clair W. 3042 Rossmoor Parkway, #1 Walnut Creek, CA 94595 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 12.50 NRSC CHECK
Kientz , R. B. 600 Graystone Terrace Orinda, CA 94563 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 30.00 NRSC CHECK

PAGE TOTAL: $ 122.50 (MEMO)

SCHEDULE A — ITEMIZED RECEIPTS — LINE NUMBER 11A

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Huegy , H. W. 101 West Windsor, #1214 Urbana, IL 61801 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 25.00 NRSC CHECK
Callahan , G. M. 17 Lancaster Road obile, AL 36608 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 7.50 NRSC CHECK
Benscheidt , Newton H. 5400 North Plum Street Hutchinson, KS 67501 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 25.00 NRSC CHECK
Pennypacker , A. H. 501 Main Street Pennsburg, PA 18073 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 2.50 NRSC CHECK
Unterveger , F. E. 201 Cortez, #408 El Paso, TX 79905 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 2.50 NRSC CHECK
Klepper , H. G P.O. Box 4265 Denver, CO 80204 ECEIPT FOR: GENERAL	INFORMATION REQUESTED Retired AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ .25 NRSC CHECK

PAGE TOTAL: $ 62.75 (MEMO)

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Gange , R. 81 Johnson Road Belle Mead, NJ 08502 RECEIPT FOR: GENERAL	R.C.A. Laboratories Scientist/engineer AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 12.50 NRSC CHECK
Hoster Jr. , J. P. 1776 6th Street, Northwes inter Haven, FL 33880 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 15.00 NRSC CHECK
Di Giorgio , J. A. 2300 Beech Street Bakersfield, CA 93301 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 12.50 NRSC CHECK
Lathrope , T. R. 540 North Pine Reedsburg, WI 53959 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 5.00 NRSC CHECK
Citta , Joseph A. Post Office Box 4 248 Washington Street Toms River, NJ 08753 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/25/86	09/25/86	$ 12.50 NRSC CHECK

PAGE TOTAL: $ 57.50 (MEMO)

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Eddy , Eugene G. 3115 Thatcher Avenue Marina Del Rey, CA 90292 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 7.50 NRSC CHECK
Dorr , W. C 2195 E. Egbert St. 114 Brighton, CO 80601 RECEIPT FOR: GENERAL	5002-021103 None AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 2.00 NRSC CHECK
Gregory , D. B 5101 Arthur St. Moss Point, MS 39563 RECEIPT FOR: GENERAL	INFORMATION REQUESTED Retired AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 12.50 NRSC CHECK
Lafean Jr. , W. L. 286 Cartwright Road Boston, MA 02181 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 30.00 NRSC CHECK
Houston , W. H. Rural Route 1, Box 337 Lenoir City, TN 37771 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 6.25 NRSC CHECK

PAGE TOTAL: $ 58.25 (MEMO)

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Karlen , G. E. Post Office Box 1394 Tacoma, WA 98401 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 41.25 NRSC CHECK
Junkunc , E. C. 2634 North Keeler Avenue Chicago, IL 60639 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 2.50 NRSC CHECK
Campbell , W. R. 2000 Smith Drive Kennesaw, GA 30144 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 26.25 NRSC CHECK
Mortensen , M. J. 5530 Sheridan Saginaw, MI 48601 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 25.00 NRSC CHECK
Lillard , R. J. Rural Route 1, Box 323 Ruckersville, VA 22968 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 10.00 NRSC CHECK
Werner , A. A. 5967 S.W. 24th Street Ter Topeka, KS 66614 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 12.50 NRSC CHECK

PAGE TOTAL: $ 117.50 (MEMO)

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Parrott , A. W. 701 La Fonda Roswell, NM 88201 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 50.00 NRSC CHECK
Brown , W. T. 437 East Causeway Bouleva ero Beach, FL 32960 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 25.00 NRSC CHECK
Kinsler , G. A. 202 West 5th Street Emporium, PA 15834 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 16.25 NRSC CHECK
Marr , M. C. 535 Church Street, Northw Marietta, GA 30060 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 30.00 NRSC CHECK
Curtiss , S. L. 810 East Maple Street Mount Pleasant, MI 48858 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 7.50 NRSC CHECK
Sanders , G. P. 7241 Esfera Street Carlsbad, CA 92008 ECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 17.50 NRSC CHECK

PAGE TOTAL: $ 146.25 (MEMO)

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
McCullough , M. E. 607 Hamilton Building Wichita Falls, TX 76301 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 125.00 NRSC CHECK
Olson , R. P. 4275 Greenhaven Drive acramento, CA 95831 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 8.75 NRSC CHECK
Greer , H. T. Anguilla, MS 38721 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 25.00 NRSC CHECK
Ballman , E. C. 1530 Bedford Forge Court, C/O Jane O. Risk Chesterfield, MO 63017 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 25.00 NRSC CHECK
Petersen , Flora 1235 East Colonial Drive Racine, WI 53405 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 13.75 NRSC CHECK

PAGE TOTAL: $ 197.50 (MEMO)

SCHEDULE A — ITEMIZED RECEIPTS — LINE NUMBER 11A

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Mendell , W. T. 712 Main Street, #2200 Houston, TX 77002 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 37.50 NRSC CHECK
Lonabaugh , E. E. Post Office Drawer 5059 Sheridan, WY 82801 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 12.50 NRSC CHECK
Shipman , L. H. Post Office Box 4142 Scott City, MO 63780 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 30.00 NRSC CHECK
Couch , R. B. 75 Underdown Road Ann Arbor, MI 48105 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 12.50 NRSC CHECK
Daughetee , C. R. 206 North Hall, #4 Valentine, NE 69201 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 5.00 NRSC CHECK
Keesecker , M. Vernaine 202 Hillview Drive Greenville, OH 45331 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 15.00 NRSC CHECK

PAGE TOTAL: $ 112.50 (MEMO)

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
McGowan , L. Mary Rural Route 2, Box 1000 Clinton, ME 04927 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 37.50 NRSC CHECK
McElroy , R. S. Post Office Box 1234 Princeton, IN 47670 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 6.25 NRSC CHECK
Werby , Gibran B. 522 East Beach Gulfport, MS 39501 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 45.00 NRSC CHECK
Smith , Nancy D Post Office Box 594 Glen Rose, TX 76043 RECEIPT FOR: GENERAL	5004-045301 21 Housewife AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 12.50 NRSC CHECK
Dunderman , H. E. Post Office Box 1417 Delray Beach, FL 33447 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 12.50 NRSC CHECK
Holly , W. G. 5095 Rochester Place Riverside, CA 92504 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 30.00 NRSC CHECK

PAGE TOTAL: $ 143.75 (MEMO)

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Devoe , R. J. Flora 527 2871 North Ocean Boulevar Boca Raton, FL 33431 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 25.00 NRSC CHECK
C'lins , K. D. 10 Short Street Lawrenceburg, IN 47025 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 97.50 NRSC CHECK
Coombs , W. E. 5810 Date Avenue Rialto, CA 92376 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 12.50 NRSC CHECK
Anderson , M. A. Rural Route E, Box 617 Caulfield, MO 65626 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 8.75 NRSC CHECK
Davenport , Fred 6001 Four Seasons Drive Sioux City, IA 51106 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 25.00 NRSC CHECK

PAGE TOTAL: $ 168.75 (MEMO)

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Henderson , E. M Post Office Box 344 Winter Garden, FL 32787 RECEIPT FOR: GENERAL	Self E. M. Henderson, Real AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 2.50 NRSC CHECK
Weaver , R. H 567 State Route 43 Suffield, OH 44260 RECEIPT FOR: GENERAL	INFORMATION REQUESTED 44260WVER667R AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 6.25 NRSC CHECK
Athow , J. K 105 Palmer Street,W. Sequim, WA 98382 RECEIPT FOR: GENERAL	INFORMATION REQUESTED Retired AGGREGATE YEAR TO DATE _____	09/19/86	09/25/86	$ 5.00 NRSC CHECK
White , A. J. 18 Seaside Sparrow Hilton Head Island, SC 29 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 25.00 NRSC CHECK
Simpson , C. D. Post Office Box 7556, Box South Lake Tahoe, CA 9573 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 18.75 NRSC CHECK
Danforth , H. D. 120 West Koplin Street Cissna Park, IL 60924 ECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 8.75 NRSC CHECK

PAGE TOTAL: $ 66.25 (MEMO)

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--- MEMO ENTRY ---

CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Padgett Jr. , H. K. 7200 Bridges Fort Worth, TX 76118 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/25/86	09/25/86	$ 15.00 NRSC CHECK
Kinney , E. S. 307 Fern Street an Diego, CA 92102 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 25.00 NRSC CHECK
Wilcoxson , M. K. Post Office Box 117 Childress, TX 79201 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 8.75 NRSC CHECK
Sanderlin , R. W. 6937 Wyoming Avenue La Mesa, CA 92041 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 6.25 NRSC CHECK
Sustad , V. A. 320 South Sycamore Street Santa Ana, CA 92701 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 60.00 NRSC CHECK
Fecke , A. J. Post Office Box 592 West Chatham, MA 02669 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 12.50 NRSC CHECK

PAGE TOTAL: $ 127.50 (MEMO)

SCHEDULE A — ITEMIZED RECEIPTS — LINE NUMBER 11A

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Ames , J. C. 1358 Snow Street Mountain View, CA 94041 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 25.00 NRSC CHECK
Haverstick , J. B. 1145 Harman Avenue ayton, OH 45419 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 12.50 NRSC CHECK
Thielens , W. P. 19 Essex Circle, N.E. Tuscaloosa, AL 35406 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 6.25 NRSC CHECK
Christopher , W. S. 7 Calvin Circle Evanston, IL 60201 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 17.50 NRSC CHECK
Markham , Mae Lenore 16223 Elisa Pl. Encino, CA 91316 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 25.00 NRSC CHECK
Mitchell , J. W 26920 S.W. 157th Avenue Homestead, FL 33031 ECEIPT FOR: GENERAL	INFORMATION REQUESTED Houswife AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 25.00 NRSC CHECK

PAGE TOTAL: $ 111.25 (MEMO)

SCHEDULE A — ITEMIZED RECEIPTS — LINE NUMBER 11A

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Bloomquist , Albert 1125 Lincoln Ave Lansing, MI 48910	2 Retired Teacher	09/17/86	09/25/86	$ 25.00
RECEIPT FOR: GENERAL	AGGREGATE YEAR TO DATE _____			NRSC CHECK
Schlienger , M. A. 1348 South Dora Street Ukiah, CA 95482	INFORMATION REQUESTED INFORMATION REQUESTED	09/17/86	09/25/86	$ 10.00
RECEIPT FOR: GENERAL	AGGREGATE YEAR TO DATE _____			NRSC CHECK
Daniels , W. E. 2611 Spring Street Paso Robles, CA 93446	INFORMATION REQUESTED INFORMATION REQUESTED	09/18/86	09/25/86	$ 30.00
RECEIPT FOR: GENERAL	AGGREGATE YEAR TO DATE _____			NRSC CHECK
Riebe , Dorothy D 141 Del Mesa Carmel Carmel, CA 93921	INFORMATION REQUESTED Housewife	09/17/86	09/25/86	$ 10.00
RECEIPT FOR: GENERAL	AGGREGATE YEAR TO DATE _____			NRSC CHECK
Peterson , P. K. 3332 Edmund Boulevard Minneapolis, MN 55406	INFORMATION REQUESTED INFORMATION REQUESTED	09/17/86	09/25/86	$ 8.75
RECEIPT FOR: GENERAL	AGGREGATE YEAR TO DATE _____			NRSC CHECK
Harriman , R. 30335 Woodhaven Lane Birmingham, MI 48010	INFORMATION REQUESTED INFORMATION REQUESTED	09/23/86	09/25/86	$ 38.75
RECEIPT FOR: GENERAL	AGGREGATE YEAR TO DATE _____			NRSC CHECK

PAGE TOTAL: $ 122.50 (MEMO)

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Davidson , William J. Route 2, Box 236 Atmore, AL 36502 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 1.50 NRSC CHECK
Ward , J. 4 Oak Street ichwood, WV 26261 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ .50 NRSC CHECK
Kenderdine , R. L. 1001 East Angelina Street Post Office Box C Palestine, TX 75801 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 3.75 NRSC CHECK
Cabaniss , W. J. 3324 East Briarcliff Road Birmingham, AL 35223 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 62.50 NRSC CHECK
Buchkosky , H. W. 2100 Governors Drive New Port Richey, FL 33552 RECEIPT FOR: GENERAL	Buchkosky Jewelers Retired AGGREGATE YEAR TO DATE _____	09/25/86	09/25/86	$ 10.00 NRSC CHECK

PAGE TOTAL: $ 78.25 (MEMO)

SCHEDULE A — ITEMIZED RECEIPTS — LINE NUMBER 11A

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Moulder , E. L. P.O. Box 348 Clarkesville, GA 30523 RECEIPT FOR: GENERAL	06110568511032820215 Retired AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 2.50 NRSC CHECK
Bullard , L.G. 510 Hwy. West B.S. 457 abasso, FL 32970 RECEIPT FOR: GENERAL	INFORMATION REQUESTED Retired AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 7.50 NRSC CHECK
Knudson , Juanita L 5 Downs Place Clemson, SC 29631 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 5.00 NRSC CHECK
Foias , Ciprian I. 3822 Brownridge Road Bloomington, IN 47405 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 12.50 NRSC CHECK
Fannin Sr. , R. W. Rural Route 1, Box 153 Ramer, AL 36069 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 6.25 NRSC CHECK
Sellman , C. J. Post Office Box 811 Mertzon, TX 76941 ECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 10.00 NRSC CHECK

PAGE TOTAL: $ 43.75 (MEMO)

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Clahassey , E. G. 1425 Michigan Avenue, N.E Grand Rapids, MI 49503 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 8.75 NRSC CHECK
Wade , B. F. 2348 Minneman Road Richmond, IN 47374 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 5.00 NRSC CHECK
Matthews , H. R. 1112 North 77th Avenue Laurel, MS 39440 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 1.25 NRSC CHECK
Mather , W. B. P.O. Box 366 Mount Gretna, PA 17064 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 12.50 NRSC CHECK
Hazzard , W. H. 4388 Arcadia Drive San Diego, CA 92103 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 25.00 NRSC CHECK
Hillmert , W. J. 11227 Maplewood Avenue Chicago, IL 60655 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 6.25 NRSC CHECK

PAGE TOTAL: $ 58.75 (MEMO)

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Nielsen , G. L. 4863 Poseidon Place Lake Worth, FL 33463 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 10.00 NRSC CHECK
Dyjak , M. R. 1217 West 10th Street anama City, FL 32401 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 2.50 NRSC CHECK
Siefkes , S. C. 2611 Canterbury Drive Santa Rosa, CA 95405 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 2.50 NRSC CHECK
Bailey , W. R. P.O. Box 4681 Incline, NV 89450 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 25.00 NRSC CHECK
Roebuck , A. A. 107 Queen Ann Drive Hazlehurst, MS 39083 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 3.75 NRSC CHECK
Thai , Tran Quan 9041 Greenville Avenue Westminster, CA 92683 ECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 2.50 NRSC CHECK

PAGE TOTAL: $ 46.25 (MEMO)

SCHEDULE A — ITEMIZED RECEIPTS — LINE NUMBER 11A

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Woods , W. A. 2211 Main Street Big Spring, TX 79720 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 2.50 NRSC CHECK
Hanson , W. E. 3223 North 36th Street oise, ID 83703 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 5.00 NRSC CHECK
Skeen , G. S. 2831 Marmount Drive Bluefield, WV 24701 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 5.00 NRSC CHECK
Sheppard , W. L. 923 Old Manoa road Upper Darby, PA 19083 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 3.75 NRSC CHECK
Murray Jr. , H. D. 420 Eastwood Fort Worth, TX 76107 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 25.00 NRSC CHECK
Williamson , W. J. P.O. Box 467 Greenville, AL 36037 ECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 30.00 NRSC CHECK

PAGE TOTAL: $ 71.25 (MEMO)

SCHEDULE A — ITEMIZED RECEIPTS — LINE NUMBER 11A

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Hilaire , Armand C. 53 Sindle Avenue Little Falls, NJ 07424	INFORMATION REQUESTED INFORMATION REQUESTED	09/17/86	09/25/86	$ 40.00
RECEIPT FOR: GENERAL	AGGREGATE YEAR TO DATE _____			NRSC CHECK
Szegho , E. 215 Ross Avenue ambridge Springs, PA 164	INFORMATION REQUESTED INFORMATION REQUESTED	09/17/86	09/25/86	$ 12.50
RECEIPT FOR: GENERAL	AGGREGATE YEAR TO DATE _____			NRSC CHECK
Campbell , J. T. 204 Lynn Avenue Laurens, SC 29360	INFORMATION REQUESTED INFORMATION REQUESTED	09/17/86	09/25/86	$ 5.00
RECEIPT FOR: GENERAL	AGGREGATE YEAR TO DATE _____			NRSC CHECK
Coffee , R. E. 303 North 10th Avenue Fort Calhoun, NE 68023	INFORMATION REQUESTED INFORMATION REQUESTED	09/17/86	09/25/86	$ 7.50
RECEIPT FOR: GENERAL	AGGREGATE YEAR TO DATE _____			NRSC CHECK
Bragg , W. W. 113 Lind Street Mc Minnville, TN 37110	INFORMATION REQUESTED INFORMATION REQUESTED	09/17/86	09/25/86	$ 30.00
RECEIPT FOR: GENERAL	AGGREGATE YEAR TO DATE _____			NRSC CHECK
Enloe , B. L. 293 Brantewood Road Buffalo, NY 14226	INFORMATION REQUESTED INFORMATION REQUESTED	09/17/86	09/25/86	$ 25.00
ECEIPT FOR: GENERAL	AGGREGATE YEAR TO DATE _____			NRSC CHECK

PAGE TOTAL: $ 120.00 (MEMO)

SCHEDULE A — ITEMIZED RECEIPTS — LINE NUMBER 11A

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Montin , J.R. T. Post Office Box 517 Plains, MT 59859 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 3.75 NRSC CHECK
Robinson , D. S. 318 North 5th Street upo, IL 62239 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 12.50 NRSC CHECK
Brown Jr. , A. S. 2411 Chuchura Road Birmingham, AL 35244 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 50.00 NRSC CHECK
Weeks , D. T. Rural Route 4, Box 95 Greenville, AL 36037 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 5.00 NRSC CHECK
Murphy , F. E. 806 5th Avenue S.E. Berlin, ND 58401 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 6.25 NRSC CHECK
Shewey , C. F. Box 108 Kermit, WV 25674 ECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 12.50 NRSC CHECK

PAGE TOTAL: $ 90.00 (MEMO)

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Taylor , F. W. 216 West Liveoak Street Coleman, TX 76834 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 25.00 NRSC CHECK
Thompson , L. E. 10701 West 6th Avenue hompson Lou Cadillac Inc Denver, CO 80215 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 25.00 NRSC CHECK
Jenkins , P. H. 28 Apache Lane Willow Street, PA 17584 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 30.00 NRSC CHECK
Blackburn , M. Lee 1919 East Sandhurst Drive Florence, SC 29501 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 6.25 NRSC CHECK
McKee , W. R. 313 Lakeview Lee's Summit, MO 64063 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 12.50 NRSC CHECK

PAGE TOTAL: $ 98.75 (MEMO)

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Garrison , T. R. 417 Forest Avenue Spartanburg, SC 29302 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 5.00 NRSC CHECK
Smart , Earl B. 4301 North 79th Street cottsdale, AZ 85251 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 12.50 NRSC CHECK
Everett , R. L. 1767 Avenida Americas Tucson, AZ 85704 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 6.25 NRSC CHECK
Cosby , M. B. 10619 Doud Houston, TX 77035 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 6.25 NRSC CHECK
Eustice , Eunice B. 309 Park Avenue Galena, IL 61036 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 7.50 NRSC CHECK
Quest , C. F. 8050 Pennsylvania Road Bloomington, MN 55438 ECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 50.00 NRSC CHECK

PAGE TOTAL: $ 87.50 (MEMO)

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Ruley , L. R 1601 Mathews Ave. Manhattan Beach, CA 90266 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 7.50 NRSC CHECK
Detamore , H. R. 909 East Druid Road Clearwater, FL 33516 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 8.75 NRSC CHECK
Walker , S. M. 624 Ridgetop Circle Birmingham, AL 35206 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 15.00 NRSC CHECK
McCord Jr. , W. H. Post Office Box 861 Brentwood, TN 37027 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 8.75 NRSC CHECK
Hughes , D. C. 5116 Braeburn Drive Bellaire, TX 77401 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 2.50 NRSC CHECK
Dulaney , D. U. 201 Edington Drive Mobile, AL 36607 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 6.25 NRSC CHECK

PAGE TOTAL: $ 48.75 (MEMO)

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--- MEMO ENTRY ---

CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Olson , J. V. 2725 Pemberton Houston, TX 77005 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 25.00 NRSC CHECK
Keeler , M. V. 429 North Owl Drive arasota, FL 33577 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 5.00 NRSC CHECK
Bernacki , Kasimierz 919 Hillside Boulevard New Hyde Park, NY 11040 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 8.75 NRSC CHECK
Bratcher Jr. , B. B. 402 North 18th Lamesa, TX 79331 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 6.25 NRSC CHECK
Edwards , J. H. 1336 Branch Water Lane Birmingham, AL 35216 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 17.50 NRSC CHECK
King , D. D. 2402 Vance Lane Austin, TX 78746 ECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 25.00 NRSC CHECK

PAGE TOTAL: $ 87.50 (MEMO)

SCHEDULE A — ITEMIZED RECEIPTS — LINE NUMBER 11A

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Bruce , W. L. 27800 Grosse Point Drive Canyon Lake, CA 92381 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 2.50 NRSC CHECK
James Jr. , G. W. Post Office Box 0 uston, LA 71270 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 125.00 NRSC CHECK
Underwood , J. P. Rural Route 1, Box 107 Forgan, OK 73938 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 8.75 NRSC CHECK
Varner , S. J. 54 East Yolo Street Orland, CA 95963 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 8.75 NRSC CHECK
Glasgow , J. D. 53 Alta Vista Drive Santa Cruz, CA 95060 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 8.75 NRSC CHECK
Hayward , W. R. 233 Milnes Road Hillsdale, MI 49242 ECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 6.25 NRSC CHECK

PAGE TOTAL: $ 160.00 (MEMO)

SCHEDULE A — ITEMIZED RECEIPTS — LINE NUMBER 11A

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Hollingsworth , A. J. 2716 Wood Drive N.E. Birmingham, AL 35215 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 2.50 NRSC CHECK
Paschetto , R. 1215 Wilbraham Road pringfield, MA 01119 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 5.00 NRSC CHECK
Michenko , K. 950 Matterhorn Drive Reynoldsburg, OH 43068 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 2.50 NRSC CHECK
Pena , F. M. 1307 Saint Augustin Avenu Laredo, TX 70040 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 2.50 NRSC CHECK
Eikenberry , W. M. 8364 Riesling Way San Jose, CA 95135 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 3.75 NRSC CHECK
Curtis , C. E. 2151 West Marion Avenue Punta Gorda, FL 33950 ECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 7.50 NRSC CHECK

PAGE TOTAL: $ 23.75 (MEMO)

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Fowler , L. W. 117 Berkshire Lane Beaumont, TX 77707 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 30.00 NRSC CHECK
Shillat , H. P. 901 Minnesota Avenue ranite Falls, MN 56241 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 5.00 NRSC CHECK
Bechtold , R. A. 4215 Grand Avenue Des Moines, IA 50312 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 2.50 NRSC CHECK
Summers , C. M. Rural Route 3, Box 501 Brownsville, TN 38012 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 2.50 NRSC CHECK
Coreland , H. F. Sugar Valley, GA 30746 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 2.50 NRSC CHECK
Marsden , G. R. 127 Esparta Way Santa Monica, CA 90402 ECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 30.00 NRSC CHECK

PAGE TOTAL: $ 72.50 (MEMO)

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Yeates , J. P. 1510 West Lynn Street Austin, TX 78703 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 30.00 NRSC CHECK
Anderson Jr. , A.E. J. 3835 Cambay Place acksonville, FL 32210 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 2.50 NRSC CHECK
Grossman , Franklin Arthur 3173 South Vrain Street Denver, CO 80236 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 10.00 NRSC CHECK
McGehee , B. H. 403 Woodroof Road Newport News, VA 23606 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 25.00 NRSC CHECK
Skeivys , Joseph 6601 South Artesian Avenu Chicago, IL 60629 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 6.25 NRSC CHECK
Moore , J. D. 4775 Cove Circle, #402 St. Petersburg, FL 33708 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 12.50 NRSC CHECK

PAGE TOTAL: $ 86.25 (MEMO)

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CONDUIT THRCUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Hill , B. C. P.O. Box 583 302 Cahaba Road Linden, AL 36743 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 12.50 NRSC CHECK
Hudson , J. V. 707 Pine Street Pascagoula, MS 39567 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 3.75 NRSC CHECK
Honodel , R. A. 1002 East North Manteca, CA 95336 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 6.25 NRSC CHECK
Caldwell , W. D. 20 Spoon Court Alpharetta, GA 30201 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 15.00 NRSC CHECK
Hardwick , L. M. 404 Elm Street Oneonta, AL 35121 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 7.50 NRSC CHECK

PAGE TOTAL: $ 45.00 (MEMO)

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Parks , R. E. 600 West Tuskeena Street Wetumpka, AL 36092 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 6.25 NRSC CHECK
Nater , Herman A. 325 Knollwood Road Tarpon Springs, FL 33589 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/16/86	09/25/86	$ 5.00 NRSC CHECK
Scheeringa , R. H. 7122 West Hamilton Road Fort Wayne, IN 46804 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/16/86	09/25/86	$ 30.00 NRSC CHECK
Faris , F. L. Post Office Box 869 Harriman, TN 37748 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 12.50 NRSC CHECK
Evins , E. W. Edgewood Street Alexandria, TN 37012 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/16/86	09/25/86	$ 50.00 NRSC CHECK
Dixon , R. 3062 Sheridan Avenue St. Louis, MO 63106 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 7.50 NRSC CHECK

PAGE TOTAL: $ 111.25 (MEMO)

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Chandless , A. H. 8 West Clearview Avenue Wilmington, DE 19809 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 2.50 NRSC CHECK
Morales , A. J. 11344 Bainbridge Drive aton Rouge, LA 70817 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 30.00 NRSC CHECK
Lofgren , Torbjorn G. 5295 20th Avenue, N.E. Fort Lauderdale, FL 33308 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/16/86	09/25/86	$ 5.00 NRSC CHECK
Liu , Frank 17227 S. F. Mission Blvd Granada Hills, CA 91344 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 2.50 NRSC CHECK
Sellars , W. Carroll 3100 Crescent Rim Drive, Boise, ID 83706 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 1.25 NRSC CHECK
Melton , H. T. North 16th Street Belleville, KS 66935 ECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 2.50 NRSC CHECK

PAGE TOTAL: $ 43.75 (MEMO)

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Barnett , C. L 633 Dahlia Ave. Holly Hill, FL 32017 RECEIPT FOR: GENERAL	INFORMATION REQUESTED Retired AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 2.50 NRSC CHECK
Musiel , H. J. 1847 Crystal Terrace oconut Grove, FL 33133 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 60.00 NRSC CHECK
McDuffee , R. W. 103 Brandywine Road Savannah, GA 31405 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 30.00 NRSC CHECK
Arneson , L. W. 23008 Kent Avenue Torrance, CA 90505 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 5.00 NRSC CHECK
Farr , R. K. 3710 Primrose Street Seal Beach, CA 90740 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 2.50 NRSC CHECK
McDaniel , M. C. Post Office Box 467 Clinton, MS 39056 ECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/16/86	09/25/86	$ 12.50 NRSC CHECK

PAGE TOTAL: $ 112.50 (MEMO)

SCHEDULE A — ITEMIZED RECEIPTS — LINE NUMBER 11A

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
DesRoches , E. P. 703 Avenue #B Marrero, LA 70072 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/16/86	09/25/86	$ 5.00 NRSC CHECK
Bredenhoeft , J. K. 1413 Loretto Street ulphur, LA 70663 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/16/86	09/25/86	$ 2.50 NRSC CHECK
Waddell , W. C. 1006 Katherine Lane Lafayette, CA 94549 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 8.75 NRSC CHECK
Myer , J. L. Rural Route 4, Box 506 Coopersburg, PA 18036 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 10.00 NRSC CHECK
Gerry , Samuel B. 2220 Avenue of the Stars Los Angeles, CA 90067 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 17.50 NRSC CHECK
Rhea Sr. , W. G. Rhea Clinic 302 Caldwell Avenue aris, TN 38242 ECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 18.75 NRSC CHECK

PAGE TOTAL: $ 62.50 (MEMO)

SCHEDULE A — ITEMIZED RECEIPTS — LINE NUMBER 11A

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Seaton , George L. 6110 South County Line Hinsdale, IL 60521 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 6.25 NRSC CHECK
Pattengill , Keith P. 1006 Old Santa Fe Trail anta Fe, NM 87501 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 8.75 NRSC CHECK
Atkinson , B. E. P.O. Drawer 788 Lufkin, TX 75901 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 25.00 NRSC CHECK
Costantino , Emil 3400 Bayside Walk San Diego, CA 92109 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 18.75 NRSC CHECK
McIlvaine , R. L. 1150 Tarpon Center Road, South Venice, FL 33595 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 6.25 NRSC CHECK
Menges , Robert H. 11409 Stonybrook Drive Grand Blanc, MI 48439 ECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 2.50 NRSC CHECK

PAGE TOTAL: $ 67.50 (MEMO)

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Gunti , C. J. 1241 Fruit Cove Road Jacksonville, FL 32223 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 25.00 NRSC CHECK
Link , L. R. 70 Hernandez Avenue an Francisco, CA 94127 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 12.50 NRSC CHECK
Telfeyan , G. J. 283 Imperial Lane Lauderdale by Sea, FL 333 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 5.00 NRSC CHECK
Huber , Frederick F. 435 East 2nd Street Jennings, LA 70546 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 5.00 NRSC CHECK
Heuckendorf , I. A. 9001 East Bloomington Frw Bloomington, MN 55420 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 2.50 NRSC CHECK
Davidson , A. T. 4637 50th Street San Diego, CA 92115 ECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 6.25 NRSC CHECK

PAGE TOTAL: $ 56.25 (MEMO)

SCHEDULE A — ITEMIZED RECEIPTS — LINE NUMBER 11A

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Coffman , G. R 13735 E. Cypress Forest Houston, TX 77070 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 5.00 NRSC CHECK
Sword , W. E. Route 2, Malibu Bay 9 Oak Lane Flint, TX 75762 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 3.75 NRSC CHECK
Auchincloss , B. C 2327 Santa Barbara St. Santa Barbara, CA 93105 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 11.25 NRSC CHECK
O'Donald , L. L. 21 Island Drive Rye, NY 10580 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 8.75 NRSC CHECK
Van Saun , W. G. 6933 Kinnikinnick Drive Roscoe, IL 61073 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 10.00 NRSC CHECK

PAGE TOTAL: $ 38.75 (MEMO)

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Jeanes Jr. , T. W. 1756 West Alabama Houston, TX 77098 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 8.75 NRSC CHECK
Holcomb , R. C 12318 Mandarin Road Jacksonville, FL 32217 RECEIPT FOR: GENERAL	INFORMATION REQUESTED Real Estate AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 3.75 NRSC CHECK
Harrington , M. T. 2405 Burton Drive Bryan, TX 77801 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 3.75 NRSC CHECK
Ingram , Bernice 313 Oak Drive Lake Jackson, TX 77566 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 1.25 NRSC CHECK
Cary , David Rural Route 2, Box 387 Hamilton, IN 46742 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 5.00 NRSC CHECK
Cary , Orpha Rural Route 2 Hamilton, IN 46742 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 5.00 NRSC CHECK

PAGE TOTAL: $ 27.50 (MEMO)

SCHEDULE A — ITEMIZED RECEIPTS — LINE NUMBER 11A

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--- MEMO ENTRY ---

CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Hockenberry , L. A. Post Office Box 98 Slippery Rock, PA 16057 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 25.00 NRSC CHECK
Landsverk , H. P. 157 17th Avenue N.W. reat Falls, MT 59404 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 1.25 NRSC CHECK
Weaver , Asachel H. 7638 Millbrook Avenue Dublin, CA 94566 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 5.00 NRSC CHECK
Hoke , M. J. Star Route, Box 14 Irvine, PA 16329 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 8.75 NRSC CHECK
Triplett , W. T. 1818 Lake Bluff Court Wilsonville, OR 97214 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 12.50 NRSC CHECK
Magalhales , W. S. 3415 Candleknoll Lane Spring, TX 77388 ECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 6.00 NRSC CHECK

PAGE TOTAL: $ 58.50 (MEMO)

SCHEDULE A — ITEMIZED RECEIPTS — LINE NUMBER 11A

PERIOD: FROM 09/25/86 TO 09/25/86 — PAGE _____ OF _____

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--- MEMO ENTRY ---

CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Shirley , L. W. Rural Route 5 Goffstown, NH 03045 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 10.00 NRSC CHECK
Middleton , A. E. 1205 Cheseapeake Avenue olumbus, OH 43212 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 8.75 NRSC CHECK
Beauchamp , A. P. Rural Route 1, Box 133 Hardinsburg, KY 40143 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 3.75 NRSC CHECK
Sawyer , A. A. 17935 Kuykendahl Spring, TX 77379 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/16/86	09/25/86	$ 6.25 NRSC CHECK
Furtner , H. J. 309 Fawn San Antonio, TX 78231 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/16/86	09/25/86	$ 6.25 NRSC CHECK
Dunten , N. S. 2855 Stratford Columbia, SC 29204 ECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 12.50 NRSC CHECK

PAGE TOTAL: $ 47.50 (MEMO)

SCHEDULE A — ITEMIZED RECEIPTS — LINE NUMBER 11A

PERIOD: FROM 09/25/86 TO 09/25/36 — PAGE _____ OF _____

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Dixon , J. J. 103 South Scott Street Camilla, GA 31730 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 7.50 NRSC CHECK
Miller , F. Stuart Post Office Box 266 Salisbury, CT 06068 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 12.50 NRSC CHECK
Hewston , H. E. 3240 Taffrail Lane Oxnard, CA 93030 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 2.50 NRSC CHECK
Rheaume , Mary 100 Water Street, #524 Haverhill, MA 01830 RECEIPT FOR: GENERAL	5002-082094 Retired AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 2.25 NRSC CHECK
Malloy , C. E. 436 Los Verdes Drive Santa Barbara, CA 93111 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/36	$ 6.25 NRSC CHECK
Armstrong , J. F. 1209 Shirley Lane Midland, TX 79701 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/36	09/25/86	$ 3.75 NRSC CHECK

PAGE TOTAL: $ 34.75 (MEMO)

SCHEDULE A — ITEMIZED RECEIPTS — LINE NUMBER 11A

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Ward , F. T. 110 Mount Pleasant Avenue Roxbury, MA 02119 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION-REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 18.75 NRSC CHECK
Fritzsche Jr. , Wo 200 Judith Drive ayton, OH 45429 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 25.00 NRSC CHECK
Lebold , W. H. 6615 North 17th Avenue Phoenix, AZ 85015 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 8.75 NRSC CHECK
Peterson , B. E. Post Office Box 1525 Friendswood, TX 77563 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 12.50 NRSC CHECK
Kauffman , E. J. Post Office Box 76 Avalon, NJ 08202 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 3.75 NRSC CHECK
McNab , M. E. 1320 Fairfax Avenue North Tonawanda, NY 14120 ECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 6.25 NRSC CHECK

PAGE TOTAL: $ 75.00 (MEMO)

SCHEDULE A — ITEMIZED RECEIPTS — LINE NUMBER 11A

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Pattison , J. M. 325 Lafayette Avenue Cincinnati, OH 45220 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 5.00 NRSC CHECK
Klein , C. J. 4901 West Armitage hicago, IL 60635 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ .50 NRSC CHECK
Thomas , H. 541 Col. Denees Road Wayne, PA 19087 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 7.50 NRSC CHECK
Riisma , Oswald 555 North Riverside Drive Pompano Beach, FL 33062 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 18.75 NRSC CHECK
Gould , D. R. 18769 Lookout Circle Cleveland, OH 44126 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 6.25 NRSC CHECK
Justus , E. J. 1826 Sherwood Drive Beloit, WI 53511 ECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 6.25 NRSC CHECK

PAGE TOTAL: $ 44.25 (MEMO)

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
McAlpin , R. L. 22157 Eccles Street Canoga Park, CA 91304 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 3.75 NRSC CHECK
Boemermann , Dorothy E. 231 Juniper Drive ebastian, FL 32958 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 2.50 NRSC CHECK
Yasinski , D. 20 Center Street Oradell, NJ 07649 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 6.25 NRSC CHECK
Thompson , D. D. 5300 Hamilton Avenue, #10 Cincinnati, OH 45224 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 2.50 NRSC CHECK
Fleckenstein , W. D. 9 Craig Court Colts Neck, NJ 07722 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 6.25 NRSC CHECK
Le Clercq , E. 3375 Foothill Road, #334 Carpinteria, CA 93013 ECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 12.50 NRSC CHECK

PAGE TOTAL: $ 33.75 (MEMO)

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Cornetet , Lucile 5800 Forest Hills Blvd, # Columbus, OH 43229 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 2.50 NRSC CHECK
Walters Jr. , E. W. 7932 Westleigh Drive Indianapolis, IN 46268 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 6.25 NRSC CHECK
Popp , H. W. 417 East Adams Avenue State College, PA 16803 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 5.00 NRSC CHECK
Wightman , M. E. 3010 Meyers Road Oak Brook, IL 60521 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 6.25 NRSC CHECK
Ross , Esther 13900 West Burleigh Road Brookfield, WI 53005 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 6.25 NRSC CHECK
Kubik , C. R. 31549 Trillium Trail Cleveland, OH 44124 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 6.25 NRSC CHECK

PAGE TOTAL: $ 32.50 (MEMO)

SCHEDULE A — ITEMIZED RECEIPTS — LINE NUMBER 11A

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Palmer , E. V. 113 West Wyoming Avenue Absecona, NJ 08201 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 8.75 NRSC CHECK
Bradley , L. F. 415 Mill Creek Lane San Gabriel, CA 91775 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 6.25 NRSC CHECK
Becker , E. W. Rural Route 1, Box 258 Whitehouse, TX 75791 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 6.25 NRSC CHECK
Fruth , Martin 5268 County Road 133 St. Cloud, MN 56301 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 6.25 NRSC CHECK
Phister Sr. , J. R. 72 Sweetbriar Avenue Fort THomas, KY 41075 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/19/86	09/25/86	$ 3.75 NRSC CHECK
Holdgrafer , V. H. J. 520 Leslie Avenue Helena, MT 59601 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/19/86	09/25/86	$ 6.25 NRSC CHECK

PAGE TOTAL: $ 37.50 (MEMO)

SCHEDULE A — ITEMIZED RECEIPTS — LINE NUMBER 11A

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Lybeck , H. M. Esmond, ND 58332 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/19/86	09/25/86	$ 5.00 NRSC CHECK
Serebraklian , Edward 534 Olmsted Drive lendale, CA 91202 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 2.50 NRSC CHECK
Ohanessian , Kirk 1704 South West 325th Pla Federal Way, WA 98023 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 5.00 NRSC CHECK
Kursch , Daisy Estes 1613 East Blackthorne Pla Milwaukee, WI 53211 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 2.50 NRSC CHECK
Tamman , Al 18 Ralston Avenue Piscataway, NJ 08854 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 11.25 NRSC CHECK
Maynard , Theodore 615 Palm Street West Palm Beach, FL 33401 ECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/17/86	09/25/86	$ 1.00 NRSC CHECK

PAGE TOTAL: $ 27.25 (MEMO)

SCHEDULE A — ITEMIZED RECEIPTS — LINE NUMBER 11A

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--- MEMO ENTRY ---

CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Baird , J. A. 4412 Westridge Avenue Fort Worth, TX 76116 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 30.00 NRSC CHECK
Smothers , E. S. 1117 Saturn Spring Drive arland, TX 75041 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 3.75 NRSC CHECK
Hyde , E. V. 2155 Wedglea Drive #1112 Dallas, TX 75211 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 5.00 NRSC CHECK
Kastrin , William C. J. 3940 Flamingo Road El Paso, TX 79902 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 90.00 NRSC CHECK
Van Bergen , G. J. 608 Front Street Dunellen, NJ 08812 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 3.75 NRSC CHECK
Bailey , W. E. 28 West 615 Ferry Road Warrenville, IL 60555 ECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 2.50 NRSC CHECK

PAGE TOTAL: $ 135.00 (MEMO)

SCHEDULE A — ITEMIZED RECEIPTS — LINE NUMBER 11A

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Weilmuenster , J. Post Office Box 111 Grapevine, TX 76051 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ .50 NRSC CHECK
Fusaro , P. 9611 14th Avenue rooklyn, NY 11228 RECEIPT FOR: GENERAL	INFORMATION REQUESTED Retired AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ .25 NRSC CHECK
Shingelo , V. 232 Elm Avenue Teaneck, NJ 07666 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 3.75 NRSC CHECK
Reddell , William H. 5837 Northgap San Antonio, TX 78239 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 25.00 NRSC CHECK
Sullivan Jr. , W. W. 41 Mission Drive Canyon Lake, TX 78130 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 5.00 NRSC CHECK
Choate , H. V. 528 East Mallory Avenue Memphis, TN 38106 ECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 3.75 NRSC CHECK

PAGE TOTAL: $ 38.25 (MEMO)

SCHEDULE A — ITEMIZED RECEIPTS — LINE NUMBER 11A

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--- MEMO ENTRY ---

CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Bretherick , J. A. 1007 North Avalon West Memphis, AR 72301 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____ NRSC CHECK	09/18/86	09/25/86	$ 2.50
Westbrook , L. C. Rural Route 3, Box 202 Saint Marys, WV 26170 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____ NRSC CHECK	09/18/86	09/25/86	$ 30.00
Cain , E. S. 138 Bonniebrook Drive Napa, CA 94558 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____ NRSC CHECK	09/18/86	09/25/86	$ 7.50
Hartsfield , G. P. Post Office Box 174 Cameron, TX 76520 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____ NRSC CHECK	09/18/86	09/25/86	$ 3.75
Flores Jr. , J. N. Post Office Box 9301 San Antonio, TX 78204 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____ NRSC CHECK	09/18/86	09/25/86	$ 15.00
Ashmore , R. T. Manly Drive Route 9 Greenville, SC 29609 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____ NRSC CHECK	09/18/86	09/25/86	$ 3.51

PAGE TOTAL: $ 62.26 (MEMO)

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Goergen , s. 10 Ravenwood Road Hartford, CT 06107 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 3.75 NRSC CHECK
Boren , J. D. 910 Greenstone uncanville, TX 75137 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 2.50 NRSC CHECK
Christensen , S. D. 1625 Chalcedony Street #1 San Diego, CA 92109 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 6.25 NRSC CHECK
Gullixson , W. C. 210 North Black Eagle Dri Manato, MN 56001 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 2.50 NRSC CHECK
Kelley , E. M. 6932 Lakeshore Drive Dallas, TX 75214 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 6.25 NRSC CHECK
Hennen Jr. , A. E. 3 Lynwood Avenue Wheeling, WV 26003 ECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 12.50 NRSC CHECK

PAGE TOTAL: $ 33.75 (MEMO)

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--- MEMO ENTRY ---

CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Dietsche , H. B. Post Office Box 337 Vinita, OK 74301 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 5.00 NRSC CHECK
Stephens , P. H. 1207 Slusser Avenue adsden, AL 35903 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 8.75 NRSC CHECK
Garner , L. S. 603 Cabrillo Road Arcadia, CA 91006 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 2.50 NRSC CHECK
Nilsson , N. E. 720 Palmer Lane Palm Harbor, FL 33563 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 12.50 NRSC CHECK
Parry , T. J. 1505 North East Edna, TX 77957 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 5.00 NRSC CHECK
Schlicher , R. E. 409 South Polk Street Welsh, LA 70591 ECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 5.00 NRSC CHECK

PAGE TOTAL: $ 38.75 (MEMO)

SCHEDULE A — ITEMIZED RECEIPTS — LINE NUMBER 11A

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--- MEMO ENTRY ---

CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Lozynsky , L. 80-38 170th Street Jamaica, NY 11432 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 1.25 NRSC CHECK
Eastin , W. J. Post Office Box 325 ille Platte, LA 70586 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 25.00 NRSC CHECK
Rea , E. C. 54 Banyan Court Lake Jackson, TX 77566 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 25.00 NRSC CHECK
Mylroie , Kathryne C. 306 Ocean Avenue, #103 Boynton Beach, FL 33435 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 5.00 NRSC CHECK
Dougherty , R. P. 4780 Huntley Drive, N.E. Atlanta, GA 30342 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 3.75 NRSC CHECK
Burk , F. M. 1421 Swan Drive Bartlesville, OK 74003 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 3.75 NRSC CHECK

PAGE TOTAL: $ 63.75 (MEMO)

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Meyer Jr. , Charles G. 518 Centre Island Road Oyster Bay, NY 11771 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 30.00 NRSC CHECK
Engan , William L. 1417 Ponds Edge Road West Chester, PA 19380 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 5.00 NRSC CHECK
Verity , R. C. Post Office Box 93 Corona, CA 91720 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 8.75 NRSC CHECK
Coleman , J. L. Rural Route 2, Box 762 Ridgeway, VA 24148 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 8.75 NRSC CHECK
Cover , F. A. 23375 Shoreland Elkhart, IN 46514 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 6.25 NRSC CHECK
Carrington , R. E. 118 Persia Randolph A.F.B., TX 78148 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 3.75 NRSC CHECK

PAGE TOTAL: $ 62.50 (MEMO)

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--- MEMO ENTRY ---

CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Newton , F. D. 7734 East Chaparral Road Scottsdale, AZ 85253 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 12.50 NRSC CHECK
Kalpakian , S. A. 436 Iowa Drive an Mateo, CA 94402 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 6.25 NRSC CHECK
Barnett , M. H. Post Office Box 714 Washington, GA 30637 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 6.25 NRSC CHECK
Younghaus , Marie A. 632 Waterloo Drive Waterloo, IL 62298 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 2.50 NRSC CHECK
Schmitt , L. S. 1123 North Ninth Tacoma, WA 98403 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 3.75 NRSC CHECK
Wilson , Paul C. 7551 Hampton Oaks Portage, MI 49081 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 3.75 NRSC CHECK

PAGE TOTAL: $ 35.00 (MEMO)

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Hancock , John K. 3665 Bryan Drive Beaumont, TX 77707 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 6.25 NRSC CHECK
McWilliams , E. D. 3631 Oakdale Drive Birmingham, AL 35223 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 13.75 NRSC CHECK
Meserve , R. L. 5600 Southwest 14 Avenue Golden Gate, FL 33999 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 2.50 NRSC CHECK
Shores Jr. , L. M. 897 Murray Road VT-7 NAS Meridian, MS 39305 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 5.00 NRSC CHECK
Cunningham , H. P. 1218 Pine Street Apartmen South Pasadena, CA 91030 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/19/86	09/25/86	$ 12.50 NRSC CHECK

PAGE TOTAL: $ 40.00 (MEMO)

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Cornelius , Elizabeth D. 8315 Saint Matins Lane Philadelphia, PA 19118 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 6.25 NRSC CHECK
McDowell , C. 780 Arundel, #106 aint Paul, MN 55103 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 3.75 NRSC CHECK
Foote , M. E. Post Office Box 322 Jensen Beach, FL 33457 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 6.25 NRSC CHECK
Kinnamon , W. B. 3122 Oxford Road Madison, WI 53705 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 3.75 NRSC CHECK
Walken , N. I. 1558 East 3rd Street Salem, OH 44460 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 2.50 NRSC CHECK
Hardt , E. F. 925 Pecan Kerrville, TX 78028 ECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 6.25 NRSC CHECK

PAGE TOTAL: $ 28.75 (MEMO)

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Eerkes , C. E. 19601 Van Aken Boulevard Shaker Heights, OH 44122 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 6.25 NRSC CHECK
Galicki , W. S. [illegible]0 Spring Road [illegible]hapaqua, NY 10514 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 2.50 NRSC CHECK
Emmons , M. L. 1250 West 87th Los Angeles, CA 90044 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 6.25 NRSC CHECK
Olsen , O. J. 703 Manitou Boulevard Colorado Springs, CO 8090 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 2.50 NRSC CHECK
VanNess , Harriet B. 155 Granite Street Valparaiso, IN 46383 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 7.50 NRSC CHECK
Brandstetter , F. X. 442 Boca Ciega Point Blvd Saint Petersburg, FL 3370 ECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 7.50 NRSC CHECK

PAGE TOTAL: $ 32.50 (MEMO)

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Lange , E. F. 706 Washington Street Sturgis, KY 42459 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 2.50 NRSC CHECK
Herwood , Francis 718 La Mirada Road Pasadena, CA 91105 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 6.25 NRSC CHECK
Morris , John Calvin P.O. Box 898 Josiah's Bridge Farm Blairsville, GA 30512 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 5.00 NRSC CHECK
Rosser Sr. , T. N. 8401 North Park Avenue Indianapolis, IN 46240 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 6.25 NRSC CHECK
Sloan , W. H. 22386 West Sunset Los Banos, CA 93635 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 8.75 NRSC CHECK

PAGE TOTAL: $ 28.75 (MEMO)

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Tyrrell , R. W. Rural Route 4, Box 85 Grand Bay, AL 36541 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 6.25 NRSC CHECK
Hanks , J. B. Post Office Box 5602 Shreveport, LA 71135 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 6.25 NRSC CHECK
Boyd , J. H. 1788 North Albert St. Paul, MN 55113 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 5.00 NRSC CHECK
Morris , N. W. 5177 Langston Road Virginia Beach, VA 23462 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 8.75 NRSC CHECK
Hutchison , A. B. Post Office Box 75 Stephenville, TX 76401 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 6.25 NRSC CHECK
Aitchison , J. R. 272 Market Street Port Hueneme, CA 93041 ECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 2.50 NRSC CHECK

PAGE TOTAL: $ 35.00 (MEMO)

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Linsenbigler , H. C. 8060 Sigle Lane poland, OH 44514 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 37.50 NRSC CHECK
Philbrook , W. D. Sherwood Oaks Box 317 ars, PA 16046 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 5.00 NRSC CHECK
Roper , T. M. 1282 Northwest Cherry Dri North Roseburg, OR 97470 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 6.25 NRSC CHECK
Chapman II , I. B. Post Office Box 12077 Fort Worth, TX 76116 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 50.00 NRSC CHECK
Adkins , E. H. 2515 West Bancroft Toledo, OH 43607 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 6.25 NRSC CHECK
Hooks , Q. P. 207 South Frisco Henderson, TX 75652 ECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 25.00 NRSC CHECK

PAGE TOTAL: $ 130.00 (MEMO)

SCHEDULE A — ITEMIZED RECEIPTS — LINE NUMBER 11A

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--- MEMO ENTRY ---

CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Chrisman , G. F. 14005 Jeffrey Drive Edmond, OK 73034 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 12.50 NRSC CHECK
Atkins Jr. , H. L. 1409 Byron Avenue Odessa, TX 79761 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 2.50 NRSC CHECK
Marks , G. M. P.O. Box 345 Lovelady, TX 75851 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 15.00 NRSC CHECK
Kime , J. H. HC 74, Box 31 Nenzel, NE 69219 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 1.25 NRSC CHECK
Burns , M. Post Office Box 414 Venus, FL 33960 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 2.50 NRSC CHECK
Cammack , N. G. Rural Route 2, Box 521 Selma, AL 36701 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 7.50 NRSC CHECK

PAGE TOTAL: $ 41.25 (MEMO)

SCHEDULE A — ITEMIZED RECEIPTS — LINE NUMBER 11A

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Hunt , W. M. 2290 Rogue River Highway Grants Pass, OR 97527 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ .25 NRSC CHECK
Thomas Jr. , E. A. Rural Route 3, Box 590 Granbury, TX 76048 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 8.75 NRSC CHECK
Norton , L. M. 6445 Northeast Windermere Seattle, WA 98105 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 12.50 NRSC CHECK
O'Donnell , James Post Office Box 531 Inverness, IL 60067 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 12.50 NRSC CHECK
Turner , W. W. Post Office Box 387 Leesburg, FL 32748 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 12.50 NRSC CHECK
Johnson , H. R. 8725 Florence Avenue Brentwood, MO 63144 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 5.00 NRSC CHECK

PAGE TOTAL: $ 51.50 (MEMO)

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Gray , A. R. 1004 East North Magnolia, AR 71753 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 3.75 NRSC CHECK
Trusty , Fay S. 4734 Southern Parkway Louisville, KY 40214 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 2.50 NRSC CHECK
Campbell , H. P. 5710 Junonia Fort Myers, FL 33908 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 6.25 NRSC CHECK
Hull , Warren T. 16055 Woodvale Road Encino, CA 91436 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 12.50 NRSC CHECK
Ross , John A. 6625 Sanger Avenue Waco, TX 76710 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 10.00 NRSC CHECK
Whittlesey , W. W. 1505 Everglade Tyler, TX 75703 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 6.25 NRSC CHECK

PAGE TOTAL: $ 41.25 (MEMO)

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Luginbill , M. B. 22007 Alizondo Drive Woodland Hills, CA 91364 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 6.25 NRSC CHECK
Hawkins , Ernest Post Office Drawer C Moriarty, NM 87035 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 25.00 NRSC CHECK
Faggard , J. M. Post Office Drawer V Pleasanton, TX 78064 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 45.00 NRSC CHECK
Anderson , M. N. 3221 13th Street Bay City, TX 77414 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 6.25 NRSC CHECK
Guither , R. E. 830-3 North Shore Drive, Saint Petersburg, FL 3370 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 2.50 NRSC CHECK
Burrell , H. T. Rural Route 1, Box 289 Campobello, SC 29322 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 25.00 NRSC CHECK

PAGE TOTAL: $ 110.00 (MEMO)

SCHEDULE A — ITEMIZED RECEIPTS — LINE NUMBER 11A

PERIOD: FROM 09/25/86 TO 09/25/86 — PAGE _____ OF _____

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--- MEMO ENTRY ---

CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Berry , W. E. 1725 Holt Street Fort Worth, TX 76103 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 5.00 NRSC CHECK
amapani , S. A. Post Office Box 874 Claremont, CA 91711 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 2.50 NRSC CHECK
razier , J. T. 2221 Cedar Paris, TX 75460 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 8.75 NRSC CHECK
urm , H. G. 23422 Pomita Street Valencia, CA 91355 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 6.25 NRSC CHECK
homas , M. L. 403 Avenue C Seagoville, TX 75159 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 2.50 NRSC CHECK
radling , Gaither Post Office Box 639 Trussville, AL 35173 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 30.00 NRSC CHECK

PAGE TOTAL: $ 55.00 (MEMO)

SCHEDULE A — ITEMIZED RECEIPTS — LINE NUMBER 11A

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Dodds , F. F. 12110 Holmes Road,#114 Kansas City, MO 64145 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 8.75 NRSC CHECK
Brudos , J. E. 115 3rd Avenue,S. Onalaska, WI 54650 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 12.50 NRSC CHECK
Regan , H. E. 1706 Northeast 179th, #20 Seattle, WA 98155 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 2.50 NRSC CHECK
Montgomery , William D. 5250-70 Foster Road Paradise, CA 95969 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 6.25 NRSC CHECK
Richardson , D. J. 1104 17th Street Nederland, TX 77627 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 6.25 NRSC CHECK
Maisheff , E. 5703 58th Place San Diego, CA 92115 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 6.25 NRSC CHECK

PAGE TOTAL: $ 42.50 (MEMO)

SCHEDULE A — ITEMIZED RECEIPTS — LINE NUMBER 11A

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Ulbrich , W. S. 17678 Springer Road Mountain View, CA 94040 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 2.50 NRSC CHECK
Rogers , T. A. 3015 25th Street Lubbock, TX 79410 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 18.75 NRSC CHECK
Milburn , H. R. 5619 Roxberry Terrace Indianapolis, IN 46226 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 1.25 NRSC CHECK
Walentine , A. H. 310 Minor Avenue Bertrand, NE 68927 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 5.00 NRSC CHECK
Fenster , M. M. 1302 North Creycroft Tucson, AZ 85712 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 6.25 NRSC CHECK
Haley , W. C. 4907 Lake Englewood Waco, TX 73710 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 12.50 NRSC CHECK

PAGE TOTAL: $ 46.25 (MEMO)

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Cason Jr. , D. L. Post Office Box 535 Madison, FL 32340 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 5.00 NRSC CHECK
Snoddy , M. E. 10234 Bridgegate Way Dallas, TX 75243 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 6.25 NRSC CHECK
Coulter , W. B. 127 Greeves Street Kane, PA 16735 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 6.25 NRSC CHECK
Johnson , F. M. 9940 Lakemere Dallas, TX 75238 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 6.25 NRSC CHECK
Yeomans , F. K. 4645 West Rotamer Road Milton, WI 53563 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 12.50 NRSC CHECK
Stark , C. A. 4516 Sparrow Road Minnetonka, MN 55345 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 2.50 NRSC CHECK

PAGE TOTAL: $ 38.75 (MEMO)

SCHEDULE A — ITEMIZED RECEIPTS — LINE NUMBER 11A

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
McNamara , Susan 1800 Haeg Drive Bloomington, MN 55431 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION-REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 6.25 NRSC CHECK
Weathers , J. N. 1607 Gurley Avenue Waco, TX 76706 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 25.00 NRSC CHECK
Allen , A. G. 47 Herencia Circle Diamondhead, AR 71909 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 7.50 NRSC CHECK
Hayden , H. L. 942 Main Street Lancaster, MA 01523 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 6.25 NRSC CHECK
Racero , Daniel D. 905 East 13th Street Weslaco, TX 78596 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 3.75 NRSC CHECK
Davison , R. W. 202 Buckingham Road Pittsburgh, PA 15215 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 25.00 NRSC CHECK

PAGE TOTAL: $ 73.75 (MEMO)

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Dillingham , N. A. 1212 Punahou Street, #300 Honolulu, HI 96826 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 25.00 NRSC CHECK
Slone , D. W. Post Office Box 56 Lakeland, GA 31635 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 8.75 NRSC CHECK
Russell , A. J. 7175 Cosgrove Drive Dallas, TX 75231 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 25.00 NRSC CHECK
Engstrom , R. H. Post Office Box 20737 Dallas, TX 75220 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 12.50 NRSC CHECK
Schiele , W. R. 12335 Fernando Drive San Diego, CA 92128 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 26.25 NRSC CHECK
Roberts Jr. , L. R. 1885 Kashlan Road La Habra, CA 90631 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 8.75 NRSC CHECK

PAGE TOTAL: $ 106.25 (MEMO)

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Skipper , P. K. 5101 North Avenue "A", #2 Midland, TX 79705 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 8.75 NRSC CHECK
Jensen , W. C. 1717 West Biggs Ground Ro Gridley, CA 95948 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 6.25 NRSC CHECK
Lambrecht , C. A. Post Office Box 126 Marco, FL 33937 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 6.25 NRSC CHECK
Dobrow , Richard B. 733 South Andresen Road Vancouver, WA 98661 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 6.25 NRSC CHECK
Gillespie , L. J. 2059 Sandpiper Drive Palm Harbor, FL 33563 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 6.25 NRSC CHECK
Darling , R. B. 205 Prince George Avenue Hopewell, VA 23860 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 6.25 NRSC CHECK

PAGE TOTAL: $ 40.00 (MEMO)

SCHEDULE A — ITEMIZED RECEIPTS — LINE NUMBER 11A
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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Eldred , M. H. 314 Telegraph Road, #21 Bellingham, WA 98225 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 2.50 NRSC CHECK
Crawford , A. S. Post Office Box 2750 Beaumont, TX 77704 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 10.00 NRSC CHECK
Hood , M. J. Post Office Box 59207 Norwalk, CA 90652 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 20.00 NRSC CHECK
Wong , J. K. Route 4, Box 467 Trenton, TN 38382 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 25.00 NRSC CHECK
Freeman Jr. , S. D. 3603 Stillmeadow Bryan, TX 77801 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 12.50 NRSC CHECK
Irby , P. E. 3215 Sarah Street Bossier City, LA 71112 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/19/86	09/25/86	$ 33.75 NRSC CHECK

PAGE TOTAL: $ 103.75 (MEMO)

SCHEDULE A — ITEMIZED RECEIPTS — LINE NUMBER 11A

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Vanderpool , H. C. 1608 Texas Street,#511 Fort Worth, TX 76102 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 6.25 NRSC CHECK
Arneson , M. A. 411 South Shore Drive Clare Lake, IA 50428 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 12.50 NRSC CHECK
Heckel Jr. , E. P. HCR 5, Box 571-J Kerrville, TX 78028 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 6.25 NRSC CHECK
Sigman , J. A. Rural Route 6 West Chester, PA 19382 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 6.25 NRSC CHECK
Bunker , F. R. 1428 South Marengo Avenue Alhambra, CA 91803 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 7.50 NRSC CHECK
Lovik , E. M. 230 South Maple Avenue Oak Park, IL 60302 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/18/86	09/25/86	$ 6.25 NRSC CHECK

PAGE TOTAL: $ 45.00 (MEMO)

SCHEDULE A — ITEMIZED RECEIPTS — LINE NUMBER 11A

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--- MEMO ENTRY ---

CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Isensee , R. H.	INFORMATION REQUESTED INFORMATION REQUESTED	09/23/86	09/25/86	$ 12.50
RECEIPT FOR: GENERAL	AGGREGATE YEAR TO DATE _____			NRSC CHECK
Folmar , L. V. 712 Vanguard ustin, TX 78734	INFORMATION REQUESTED INFORMATION REQUESTED	09/23/86	09/25/86	$ 6.25
RECEIPT FOR: GENERAL	AGGREGATE YEAR TO DATE _____			NRSC CHECK
Devall , Charles K. 820 Crimwood Lane Kilgore, TX 75662	INFORMATION REQUESTED INFORMATION REQUESTED	09/23/86	09/25/86	$ 5.00
RECEIPT FOR: GENERAL	AGGREGATE YEAR TO DATE _____			NRSC CHECK
Martin , B. C. Post Office Box 93 Tchula, MS 36169	INFORMATION REQUESTED INFORMATION REQUESTED	09/23/86	09/25/86	$ 3.75
RECEIPT FOR: GENERAL	AGGREGATE YEAR TO DATE _____			NRSC CHECK
Ohler , B. M. 107 Oakhill Avenue Plymouth, IN 46563	INFORMATION REQUESTED INFORMATION REQUESTED	09/23/86	09/25/86	$ 12.50
RECEIPT FOR: GENERAL	AGGREGATE YEAR TO DATE _____			NRSC CHECK
Gabler , G. E. 7801 Southwest 50th Court Miami, FL 33143	INFORMATION REQUESTED INFORMATION REQUESTED	09/23/86	09/25/86	$ 30.00
ECEIPT FOR: GENERAL	AGGREGATE YEAR TO DATE _____			NRSC CHECK

PAGE TOTAL: $ 70.00 (MEMO)

SCHEDULE A — ITEMIZED RECEIPTS — LINE NUMBER 11A

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Umberson , Jack 3915 Potrero Avenue, #9 Richmond, CA 94804 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 12.50 NRSC CHECK
Copeland , C. M. 2931 Virginia Road Birmingham, AL 35223 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 5.00 NRSC CHECK
Bybee , B. L. 522 Gretna Green Way Los Angeles, CA 90049 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 6.25 NRSC CHECK
Jacobs , Lillian L. 71 East Lagoona Drive Brick Town, NJ 08723 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 2.50 NRSC CHECK
Kressler , Marion 704 Coliseum Street New Orleans, LA 70118 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 6.25 NRSC CHECK
Kranert , L. W. 1119 Locust Avenue, S.E. Huntsville, AL 35801 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 30.00 NRSC CHECK

PAGE TOTAL: $ 62.50 (MEMO)

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Nettleton , E. H. 920 Oak Sandpoint, ID 83381 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 5.00 NRSC CHECK
Moberly , W. Y. Post Office Box 1896 Kalispell, MT 59901 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 12.50 NRSC CHECK
Frederick , H. E. 97924 Lively Lane Brookings, OR 97415 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 5.00 NRSC CHECK
Panisch , H. J. 1504 Montpelier Street Mobile, AL 36609 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 15.00 NRSC CHECK
Mojica , Mauro C. 2037 Lorraine Street West Covina, CA 91792 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 2.50 NRSC CHECK
Long , H. J. 1104 South Calvin Monahans, TX 79756 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 60.00 NRSC CHECK

PAGE TOTAL: $ 100.00 (MEMO)

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Hestes , K. D. 20 Cliff Drive Mineral Wells, TX 76067 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 15.00 NRSC CHECK
Crandall , D. R. 340 Riviera Drive St. Clair Shores, MI 4808 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 7.50 NRSC CHECK
Ellis , S. H. Rural Route 5, Box 7298 Phenix City, AL 36867 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 7.50 NRSC CHECK
Southwick , H.G. 2231 Dover Avenue Ft Myers, FL 33907 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 30.00 NRSC CHECK
Plowden Jr. , A. D. Post Office Box 2518 Sumter, SC 29150 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 25.00 NRSC CHECK
McCulley , M. F. 2601 West 154th Street Alondra, CA 90249 ECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 5.00 NRSC CHECK

PAGE TOTAL: $ 90.00 (MEMO)

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--- MEMO ENTRY ---

CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Lascari , J. A. 201 North Jeff Davis New Orleans, LA 70119 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 30.00 NRSC CHECK
Safer , D. L. Post Office Box 2444 Baton Rouge, LA 70821 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 6.25 NRSC CHECK
Moran , R. P. Post Office Box 4082 Gulfport, MS 39501 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 8.75 NRSC CHECK
Kelly , E. W. 1101 Kavanaugh Boulevard Little Rock, AR 72205 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 2.50 NRSC CHECK
Bates , W. F. 16644 Merivale Lane Pacific Palisades, CA 902 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 6.25 NRSC CHECK
Gatlin , R. E. 3405 Virginia Amarillo, TX 79109 ECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 3.75 NRSC CHECK

PAGE TOTAL: $ 57.50 (MEMO)

SCHEDULE A — ITEMIZED RECEIPTS — LINE NUMBER 11A

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Dunmire , Ralph G. 2834 Camas Court Missoula, MT 59801 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____ NRSC CHECK	09/23/86	09/25/86	$ 7.50
Higley , Margaret H. Post Office Box 2175 Carmel, CA 93921 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____ NRSC CHECK	09/23/86	09/25/86	$ 30.00
Bradshaw Jr. , R. S. 1111 Morningside Drive Lufkin, TX 75901 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____ NRSC CHECK	09/23/86	09/25/86	$ 25.00
Edwards , William C. 9701 Manslick Road Louisville, KY 40272 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____ NRSC CHECK	09/23/86	09/25/86	$ 30.00
Ross , J. T. Rural Route 14, Box 392 Charlotte, NC 28208 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____ NRSC CHECK	09/23/86	09/25/86	$ 7.50
Utley , Larry Jay 3373 Station Street Indianapolis, IN 46218 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____ NRSC CHECK	09/23/86	09/25/86	$ 2.50

PAGE TOTAL: $ 102.50 (MEMO)

SCHEDULE A — ITEMIZED RECEIPTS — LINE NUMBER 11A

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Travis , F. A. 212 Elkay Drive Eugene, OR 97404 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 2.50 NRSC CHECK
Birkenfeld , J. M.A. 1011 Miller Avenue erkley, CA 94708 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 2.50 NRSC CHECK
Richardson Jr. , J. 117 2nd Street Irvington, NJ 07111 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 2.50 NRSC CHECK
Truluck , T. D. 101 Eastwood Avenue Union, SC 29379 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 10.00 NRSC CHECK
Lyon , Beth M. Post Office Box 253 Georgetown, CA 95634 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 12.50 NRSC CHECK
Coldren , L. F. 3204 Maxwell Drive Midland, TX 79705 ECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 30.00 NRSC CHECK

PAGE TOTAL: $ 60.00 (MEMO)

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Henton , G. H. 4247 Northeast Glisan Portland, OR 97213 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 3.75 NRSC CHECK
Shanafelt , P. W. 1121 Shell Point Village ort Meyers, FL 33908 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 30.00 NRSC CHECK
Sanders , Jesse L. 48 Talmadge Street Asheville, NC 28806 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/25/86	09/25/86	$ 120.00 NRSC CHECK
Houser , L. M. Rural Route 1, Box 120 Marion, LA 71260 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 12.50 NRSC CHECK
Kneisler , M. Rural Route 2, Box 93 Keystone Heights, FL 3265 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 2.50 NRSC CHECK
Damon , J. A. P.O. Box 2120 Alliance, OH 44601 ECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 12.50 NRSC CHECK

PAGE TOTAL: $ 181.25 (MEMO)

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Dunstan , T. K. Post Office Box 364 Green Farms, CT 06436 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 2.50 NRSC CHECK
Sanderson , C. B. R.F.D. 2 ambria, WI 53923 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 2.50 NRSC CHECK
Scoggin , E. K. 3701 Bryant Avenue,S.,#20 Minneapolis, MN 55409 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 2.50 NRSC CHECK
Huey Jr. , W. R. 6421 West 96th Street Zionsville, TX 46077 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 17.50 NRSC CHECK
Klingemann , E. L North 4724 Washington Str Spokane, WA 99208 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 25.00 NRSC CHECK
Livingston , D. W. P.O. Box 5 Heidelberg, MS 39439 ECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 25.00 NRSC CHECK

PAGE TOTAL: $ 75.00 (MEMO)

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Scovell , T. H. 607 North McDonald Avenue De Land, FL 32704 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 8.75 NRSC CHECK
Gully , R. J. 3174 Peninsular Harbor aytona Beach, FL 32018 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 25.00 NRSC CHECK
Schupak , E. 282 Broadway Darien Center, NY 14040 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 2.50 NRSC CHECK
Allen Sr. , D. E. Post Office Box 250 Siloam Springs, AR 72761 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 17.50 NRSC CHECK
Bigelow , Boyd 7033 East Warren Drive Denver, CO 80224 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 25.00 NRSC CHECK
Romberg , F. B. Post Office Box 218 Holland, TX 76534 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 10.00 NRSC CHECK

PAGE TOTAL: $ 88.75 (MEMO)

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Savallo , J. P. Post Office Box 202 Grand Saline, TX 75140 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 5.00 NRSC CHECK
Orscheln , G. A. 339 North Williams oberly, MO 65270 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 62.50 NRSC CHECK
Cousar , R. W. Presbyterian Home Clinton, SC 29325 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 8.75 NRSC CHECK
Stephenson , J. D. 21272 East River Road Gross Ile, MI 48138 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 2.50 NRSC CHECK
Bedingfield , J. A. Tippin Street Baxley, GA 31513 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 6.25 NRSC CHECK
Wilcox , L. J. 108 Cape Cod Lane Beach Haven, NJ 08008 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 6.25 NRSC CHECK

PAGE TOTAL: $ 91.25 (MEMO)

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Wells , Harriet S. 1615 Waverly Road Pasadena, CA 91108 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 3.75 NRSC CHECK
Ballou , F. H. 4020 East Calle Del Sud cottsdale, AZ 85251 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 5.00 NRSC CHECK
Johnson , H. B. 3401 Malcolm Avenue Oakland, CA 94605 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 6.25 NRSC CHECK
Schlitters , E. M. 1357 Yorkshire Grosse Pointe Park, MI 48 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 17.50 NRSC CHECK
Bailey , R. E. Post Office Box 764 Goldfield, NV 89013 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 8.75 NRSC CHECK
Hall , J. E. 101 Jericho Road Weston, MA 02193 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 17.50 NRSC CHECK

PAGE TOTAL: $ 58.75 (MEMO)

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Mitchell , E. H. Post Office Box 641 Picayune, MS 39466 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 15.00 NRSC CHECK
Richardson , H. E. 1 Wellington Court Richmond, KY 40475 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 6.25 NRSC CHECK
Lawry , G. C. 3737 Atlantic Avenue, #71 Long Beach, CA 90807 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 3.75 NRSC CHECK
Sprauer , J. W. 200 Dakota Avenue Wilmington, DE 19803 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 12.50 NRSC CHECK
Green , H. F. Rural Route 1, Box 264 Austin, TX 78725 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 25.00 NRSC CHECK
Calicut , G. H. 511 El Lejon Oil Pale, CA 93308 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 5.00 NRSC CHECK

PAGE TOTAL: $ 67.50 (MEMO)

SCHEDULE A — ITEMIZED RECEIPTS — LINE NUMBER 11A

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Barber Jr. , W. F. 101 Clubhouse Lane Naples, FL 33942 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 6.25 NRSC CHECK
Andersen , C. R. 501 East Nishna Road henandoah, IA 51601 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 2.50 NRSC CHECK
Meyer , Thomas E. 8131 Paseo Del Ocaso La Jolla, CA 92037 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 6.25 NRSC CHECK
Wintersteen , Phyllis A. 1945 East Cantrell Decatur, IL 62521 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 6.25 NRSC CHECK
Noble , Caroline 3433 College Avenue Sacramento, CA 95818 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 10.00 NRSC CHECK
Jensen , Boyd F. 5380 Hillside Drive Murray, UT 84107 ECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 17.50 NRSC CHECK

PAGE TOTAL: $ 48.75 (MEMO)

SCHEDULE A — ITEMIZED RECEIPTS — LINE NUMBER 11A

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Glidden , A. L. Post Office Box 145 New Canaan, CT 06840 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 60.00 NRSC CHECK
Walker , R. E. 302 Hermosa ong Beach, CA 90802 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 5.00 NRSC CHECK
Schmid , A. H. 12370 State Road A1A Alt. Lake Park, FL 33410 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 2.50 NRSC CHECK
Thomas , V. B. 820 Northeast 3rd Avenue Hillsboro, OR 97124 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 5.00 NRSC CHECK
Walters Sr. , J. F. Post Office Box 7318 A Birmingham, AL 35253 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 17.50 NRSC CHECK

PAGE TOTAL: $ 90.00 (MEMO)

SCHEDULE A — ITEMIZED RECEIPTS — LINE NUMBER 11A

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Sharpe , W. G. 208 Jarvis Avenue Somerset, KY 42501 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 6.25 NRSC CHECK
Gidcumb , Dewey Post Office Box 151 ovington, LA 70434 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 5.00 NRSC CHECK
Saunders , T. A. Post Office Box 396 South Hill, VA 23970 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 8.75 NRSC CHECK
Revere , J. H. Post Office Box 413 Kenbridge, VA 23944 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 6.25 NRSC CHECK
Calvert , Lawrence C. Rural Route 6, Box 4210 Cullman, AL 35055 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 5.00 NRSC CHECK
Marchman , R. L. 56 Perimeter Center East, Atlanta, GA 30346 ECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 7.50 NRSC CHECK

PAGE TOTAL: $ 38.75 (MEMO)

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Holman , H. H. 1622 Crestmont Drive Norman, OK 73069 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 6.25 NRSC CHECK
Herzstein , A. 6141 Westview ouston, TX 77050 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 12.50 NRSC CHECK
Lawrence , B. A. &^#) Bellfort Houston, TX 77061 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 6.25 NRSC CHECK
Backman , H. E. 1884 Berkshire Lane Plymouth, MN 55441 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 12.50 NRSC CHECK
Turner Jr. , C. B. Post Office Box 3628, CRS Johnson City, TN 37602 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 6.25 NRSC CHECK
Lang , Anita 13 Chatham Circle Kankakee, IL 60901 ECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 30.00 NRSC CHECK

PAGE TOTAL: $ 73.75 (MEMO)

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Crandall , R. S. 3009 Skyline Boulevard Bakersfield, CA 93305 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 5.00 NRSC CHECK
Snook , M. K. 1915 North Kentucky exico, MO 65265 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 2.50 NRSC CHECK
McCommons , R. D. 8910 Main Street Mc Kean, PA 16426 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 12.50 NRSC CHECK
Johnson , M. R. 1105 West 13th McCook, ME 69001 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 30.00 NRSC CHECK
Anderson Jr. , A. G. 401 Slash Pine Court Fort Walton Beach, FL 325 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 12.50 NRSC CHECK
Bailey , H. N. 25256 Terreno Drive Mission Viejo, CA 92691 ECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 5.00 NRSC CHECK

PAGE TOTAL: $ 67.50 (MEMO)

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Girbau , Mario 292 Northwest 56th Avenue Miami, FL 33126 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 1.25 NRSC CHECK
Baskerville , W. H. 3680 Edd Tide Lane ulf Breeze, FL 32561 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 30.00 NRSC CHECK
Erickson , C. L. 11326 Donovan Road Los Alamitos, CA 90720 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 50.00 NRSC CHECK
Hawkins , R. H. 2185 Norwood Eugene, OR 97402 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 30.00 NRSC CHECK
Johnson , Richard J. 1010 South Garfield Avenu Traverse City, MI 49684 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 25.00 NRSC CHECK
Norman , M. E. 58 Wansley Road Laurel, MS 39440 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 30.00 NRSC CHECK

PAGE TOTAL: $ 166.25 (MEMO)

SCHEDULE A — ITEMIZED RECEIPTS — LINE NUMBER 11A

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Prouty , C. E. 4690 Kingswood Drive Okemos, MI 48864 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 2.50 NRSC CHECK
Waterman , M. N. 67 Linden Lane hatham, NJ 07928 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 3.75 NRSC CHECK
Gmeiner , S. M. Rural Route White Lake, WI 54491 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 7.50 NRSC CHECK
Staudenmeier , C. W. 1134 Spruce Street Ashland, PA 17921 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 6.25 NRSC CHECK
Hanson , E. A. 17117 Gulf Boulevard, #13 St. Petersburg, FL 33708 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 3.75 NRSC CHECK
Ferguson , A. L. 181 North Liberty, #1 Boise, ID 83704 ECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 2.50 NRSC CHECK

PAGE TOTAL: $ 26.25 (MEMO)

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Howard , M. 14012 Evers Ave. Compton, CA 90222 RECEIPT FOR: GENERAL	INFORMATION REQUESTED Barber AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 3.75 NRSC CHECK
DeMarco , R. 833 South 28th Street maha, NE 68105 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 6.25 NRSC CHECK
Burchard , R. E. Bridge Street La Belle, FL 33935 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 30.25 NRSC CHECK
Adams , T. W. 4200 Stacey Road Jacksonville, FL 32250 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 2.50 NRSC CHECK
Lockhart , G. R. 2604 Arroyo Drive Durango, CA 81301 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 5.00 NRSC CHECK
Muniz , Francisco L. GPA Box 2407 San Juan, PR 00936 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 6.25 NRSC CHECK

PAGE TOTAL: $ 54.00 (MEMO)

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Roberts , M. C. Post Office Box 908 Levelland, TX 79336 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 30.00 NRSC CHECK
Dehart , C. H. 4643 Bundy Road New Orleans, LA 70127 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 1.25 NRSC CHECK
Whitworth , S. E. 26 North Walnut Street Dillon, MT 59725 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 8.75 NRSC CHECK
Ferguson , W. M. 123 North Jefferson Wellington, KS 67152 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 62.50 NRSC CHECK
Donnell , William L 3237 NW 21st Oklahoma City, OK 73107 RECEIPT FOR: GENERAL	IMPLOYERS Casualty Co Special Agent AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 2.50 NRSC CHECK
Gennet , A. R. 27 Tremont Terrace Livingston, NJ 07039 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 25.00 NRSC CHECK

PAGE TOTAL: $ 130.00 (MEMO)

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Neal , J. W. Post Office Box 278 Hobbs, NM 88240 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86 NRSC CHECK	09/25/86	$ 5.00
Corff , N. C. 12500 Blue Sage Road klahoma City, OK 73120 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86 NRSC CHECK	09/25/86	$ 5.00
Welp , J. H. Bancroft, IA 50517 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86 NRSC CHECK	09/25/86	$ 6.25
McClanahan , M. E. 2307 Lakeshore Drive Cleburne, TX 76031 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86 NRSC CHECK	09/25/86	$ 30.00
Martin , W. K. 710 North 3rd Street Aspen, CO 81611 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86 NRSC CHECK	09/25/86	$ 12.50
Schmidt , T. J. 1047 Kreis Lane Cincinnati, OH 45205 ECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86 NRSC CHECK	09/25/86	$ 6.25

PAGE TOTAL: $ 65.00 (MEMO)

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Christ , C. J. Post Office Box 10037. St Houma, LA 70363 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 2.50 NRSC CHECK
Holmes , Robert E. 16 Rockcreek Drive reenville, SC 29605 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 6.25 NRSC CHECK
Rettig , W. F. 116 Hawthorne Drive, SE Washington C. H., OH 4316 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 8.75 NRSC CHECK
Meierbachtol , E. C. 8100 Highwood Drive, #G33 Bloomington, MN 55438 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 6.25 NRSC CHECK
Kufdakis , A. D. 1411 Denison Springfield, IL 62704 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 6.25 NRSC CHECK
Crawford , George V 7260 S.W. 130th St. Miami, FL 33156 RECEIPT FOR: GENERAL	INFORMATION REQUESTED Retired AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 18.75 NRSC CHECK

PAGE TOTAL: $ 48.75 (MEMO)

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Hardin , N. C. 321 North 5th Street Louisiana, MO 63353 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 6.25 NRSC CHECK
Aycock , Robert V. 310 West 49th Street ansas City, MO 64112 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 6.25 NRSC CHECK
Warner , J. F. 468 Dewey Street Wheelersburg, OH 45694 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 5.00 NRSC CHECK
Prince , Virginia M. 68 Wheatley Road Glen Head, NY 11545 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 25.00 NRSC CHECK
Allen Sr. , Willis M. 1131 Wall Street La Jolla, CA 92037 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 12.50 NRSC CHECK
Pusinelli , Maxine G. 453 East 6th Street Hinsdale, IL 60521 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 50.00 NRSC CHECK

PAGE TOTAL: $ 105.00 (MEMO)

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Bell , Roland R. 2502 Blanding Boulevard Jacksonville, FL 32210 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 30.00 NRSC CHECK
Kraemer , Alyce M. 620 Ridge Road West Bend, WI 53095 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 25.00 NRSC CHECK
Storer , Martha 421 North Michael Street Saint Marys, PA 15857 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/23/86	09/25/86	$ 6.25 NRSC CHECK
Holbine , Louise 117 East Atlantic Avenue, Haddon Heights, NJ 08035 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/25/86	09/25/86	$ 50.00 NRSC CHECK
Warwick , H. Paul 1200 South Ocean Boulevar P.O. Box 1409 Boca Raton, FL 33432 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/25/86	09/25/86	$ 12.50 NRSC CHECK

PAGE TOTAL: $ 123.75 (MEMO)

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Sullivan , Bolton 77 Pembroke Drive Lake Forest, IL 60045 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/25/86	09/25/86	$ 87.50 NRSC CHECK
Manning , E. H 430 N.E. 22 Ter. #205 iami, FL 33137 RECEIPT FOR: GENERAL	INFORMATION REQUESTED Retired AGGREGATE YEAR TO DATE _____	09/25/86	09/25/86	$ 3.75 NRSC CHECK
Hartman , Robert E. P.O. Box 578 Somis, CA 93066 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/25/86	09/25/86	$ 30.00 NRSC CHECK
Lenfestey , F. J. 903 North Broadway De Pere, WI 54115 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/25/86	09/25/86	$ 30.00 NRSC CHECK
Wright , C. E. P.O. Box 404 Woodville, TX 75979 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/25/86	09/25/86	$ 30.00 NRSC CHECK
Hinson , R. P. Route 1, Box 284D Barnwell, SC 29812 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/25/86	09/25/86	$ 6.25 NRSC CHECK

PAGE TOTAL: $ 187.50 (MEMO)

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CONDUIT THROUGH NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS

NAME OF CANDIDATE COMMITTEE:
Broyhill for Senate Committee

FULL NAME, MAILING ADDRESS	EMPLOYER/ OCCUPATION	DATE RECEIVED	DATE SENT	AMOUNT
Frye , Helen H. 124 Upham Street Melrose, MA 02176 RECEIPT FOR: GENERAL	INFORMATION REQUESTED INFORMATION REQUESTED AGGREGATE YEAR TO DATE _____	09/25/86	09/25/86	$ 2.50 NRSC CHECK
Roark , Cecil B Box 268 De Ridder, LA 70634 RECEIPT FOR: GENERAL	INFORMATION REQUESTED Retired AGGREGATE YEAR TO DATE _____	09/25/86	09/25/86	$ 45.00 NRSC CHECK

PAGE TOTAL: $ 47.50 (MEMO)

TOTAL: $

RECEIVED AT THE FEC

87 JUN 2 A10 : 25

FEDERAL ELECTION COMMISSION

In the Matter of)
MUR 2282)
)
National Republican Senatorial Committee,)
Richard G. Nelson, as Treasurer,)
Respondents.)

SUPPLEMENTAL MEMORANDUM

Introduction

The National Republican Senatorial Committee ("NRSC") and its Treasurer, the respondents herein, by their attorneys, respectfully submit this short Supplemental Memorandum in response to the April 13, 1987 letter from the Chairman of the Federal Election Commission ("the Commission" or "the FEC") to the respondents' counsel, setting forth the Commission's April 7, 1987 findings of reason to believe that the respondents had violated the Federal Election Campaign Act of 1971 ("the Act").

By the same April 13 letter, the Chairman also forwarded a set of Questions and Requests for Information to which the respondents have provided answers in a document filed separately on this date. Based upon those answers, and the additional discussion in this Memorandum, the respondents submit that the Commission should find no probable cause to believe that the respondents have violated the Act.

I. THOSE REPLYING TO THE SEPTEMBER 2 SOLICITATION EARMARKED THEIR CONTRIBUTIONS TO SPECIFIC FEDERAL CANDIDATES.

The respondents submit that their answers to the Commission's Questions and Requests for Information further

demonstrate that those persons who replied to the mailings of September 2, 1986 in fact earmarked their contributions to specific federal candidates. The NRSC, therefore, properly reported those contributions.

As we discussed at length in our initial submission to the FEC, a political committee has an absolute right to contact interested persons to inform them of important issues and the races in which those issues are being hotly contested, and also to solicit their assistance to candidates through earmarked contributions. Indeed, the Commission has so held. See, e.g., MUR 1028, Council for a Livable World; Advisory Option 1983-18, Fed. Election Camp. Fin. Guide (CCH) ¶5662 (1983); Advisory Opinion 1980-46, Fed. Election Camp. Fin. Guide (CCH) ¶5508 (1980); Advisory Opinion 1976-51, Fed. Election Camp. Fin. Guide (CCH) ¶5251 (1976). NRSC solicitation is thus not legally determinative of the FEC's evaluation of a contributor's decision to earmark.

Additionally, in determining whether contributions in fact were earmarked by their donors, the Commission has never required more than that "the facts indicated that the candidate was identifiable as to specific office, party affiliation, and election cycle." Advisory Opinion 1982-23, Fed. Election Camp. Fin. Guide (CCH) ¶5662 (1982). Thus, the Commission has upheld earmarked contributions made through a committee other than that which received the donation in the first place, and in response to solicitations for a "candidate" who had not been selected yet.

In the instant case, there can be no doubt that each recipient of the September 2 mailing knew that the solicitation was for Republican candidates in the 1986 elections for the United States Senate, and the targeted races were both clearly identified to and by the recipient in the documents that were exchanged.

Finally, and, given the FEC's specific question on the subject, most importantly, it would be superficial and erroneous for the Commission to conclude that merely because those who responded to the September 2 mailing essentially did so in the manner suggested by the NRSC, they did not earmark their contributions. In fact, the data included in the NRSC's answers to the FEC's questions show that most of the recipients of the mailing made a choice other than that suggested by the NRSC, and that those who did respond actually made their own choice.

The governing standard on the subject of the contributor's earmarking decision is that set forth in the matter of Council for a Livable World, supra. There, approving the committee's solicitation of contributions to its designated candidates, the Commission adopted the General Counsel's position that the controlling factor is whether "the individual contributors, not the Council, determine whether or not contributions to candidates will be made." General Counsel's Brief at 4.

In the instant case, the September mailing actually was received by well-in-excess-of a half-million persons. Of that number, slightly more than 43,000 persons -- or about eight and

one-half percent -- chose to earmark their contributions to candidates through the NRSC. In other words, more than nine out of every ten persons to have received the mailing either chose to reject or ignore the NRSC's suggestion or, based on the information contained in the mailing and elsewhere, decided to contribute to a candidate or candidates, but without using the NRSC as a conduit.

In short, the determinative questions are: whether or not the recipient of the mailing could and did make a choice independent of the NRSC; and, the contributor having made such a choice, whether the NRSC could countermand it. The evidence submitted demonstrates that each recipient in fact made the controlling choice and that, once made, the NRSC could do, and did, no more than to process, transmit, document and report the donor-directed contribution.

2 0 1 4 0 7 3 2 8 6 8

II. THE NRSC DID NOT EXERCISE "DIRECTION AND CONTROL" OVER THE CHOICE OF CANDIDATES.

In the Chairman's letter, the Commission posits "that if these contributions were so earmarked, the NRSC may have exercised direction and control over the choice of the recipient candidates." The documentary evidence thoroughly supports the conclusion that the NRSC could not, and did not, countermand the designations made by any contributor. Once the NRSC obtained the contributors' earmarked contributions with the enclosure listing the candidates that the donor intended to receive them, the NRSC's activities were wholly non-discretionary.

While the initial suggestions and descriptions of the candidates most in need of individual support originated with the NRSC, the determinative "direction" (i.e., the decision to earmark and the execution of that decision by sending the earmarked contribution through the NRSC) was exclusively the donor's. Further, the NRSC could not, and did not, "control" a donor's making of that decision. And that decision having been made and evidenced, the NRSC could not, and did not, exercise control by changing it.

Given the language of the statute that authorizes earmarking, 2 U.S.C. § 441a(a)(8), and most particular, the Commission's conduiting regulation, 11 C.F.R. 110.6(c)(1)(i), which mandates certain disclosures if "the contribution passed through the conduit's account," the fact that the NRSC (again, with the contributors' understanding and authorization) processed the contributions through its own bank account is indicative of neither direction nor control, however those words might legally be construed. Contributors are specifically authorized to make earmarked contributions to the order of a conduit's account and such an account may in turn be used to transmit the contribution proceeds to the beneficiary candidate.

For these reasons, we respectfully submit not only that the contributors who replied to the September 2 mailings earmarked their contributions, but also that, notwithstanding that donor earmarking, the NRSC did not exercise "direction or

control" over the choice of recipient candidates or over the monies conduited.

III. THE NRSC DISCLAIMER ON THE SEPTEMBER 2 MAILING WAS PROPER.

The General Counsel's Factual and Legal Analysis concludes that instead of the disclaimer which stated "Paid for and authorized by the National Republican Senatorial Committee," the September 2 mailing should have contained a disclaimer stating that the mailing had been authorized by or paid for by the recipient candidates. We respectfully disagree.

Question No. 7 of the FEC's Questions and Requests for Information asks the NRSC to describe what, if any, authorizations were received from various candidates for the September 2 mailing and what information and documents were provided by the NRSC to the candidates. As the answers and supporting documentation submitted by the NRSC to that question establish, the candidates were aware and approved that the NRSC intended generally to solicit earmarked contributions and that, if this effort was successful, certain legal requirements would have to be satisfied by the NRSC and the candidates.

However, the September 2 mailing was not reviewed by the candidates prior to its dissemination and was not specifically authorized or approved by them. It would have been erroneous so to state.

2 0 0 4 3 2 7 0

Notwithstanding the fact that the costs of the mailing were ultimately paid for (either directly or as a charge against coordinated expenditures) by the candidates to whom the contributions had been directed, it also would have been erroneous to suggest that the mailing was "authorized" on this basis. Because the receipt of an earmarked contribution entirely depended upon the contributor's decision, and because that decision could not be known or predicted prior to the mailing or be made until the mailing had been received by the contributor, no authorized, allocable event could have taken place until the NRSC, as conduit, obtained the contributor's instruction and check.

Finally, at the time the mailing was sent, no candidate had paid for it, and the portion of the cost for which any candidate would ultimately be responsible could not be identified or allocated until the responses were received by the NRSC. Theoretically, at least, an individual might have received nothing and so would have paid nothing. A disclaimer showing that a candidate had, at the time of the mailing, paid for it or was obligated to pay for it, would have been inaccurate.

CONCLUSION

For the reasons stated herein, as well as in the related submissions made to the Commission, the respondents submit that the Commission should determine that there is no probable cause to believe that the respondents have violated the Act.

Dated June 1, 1987

Respectfully submitted,

EPSTEIN BECKER BORSODY & GREEN, P.C.

By: Stuart M. Gerson

Stuart M. Gerson

1140 19th Street, N.W.
Washington, D.C. 20036
(202) 861-0900

Attorneys for the Respondents

Of Counsel:

Benjamin L. Ginsburg, Esquire
Legal Counsel
National Republican Senatorial Committee
440 First Street, N.W.
Suite 600
Washington, D.C. 20001

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SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
National Republican Senatorial Committee and Richard G. Nelson, as treasurer	)	MUR 2282

GENERAL COUNSEL'S REPORT

On April 7, 1987, the Commission found reason to believe the respondents had violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"), and issued interrogatories and requests for documents to the respondents to initiate its investigation of this matter. At the request of the respondents, the Commission (on May 4, 1987) granted the respondents an extension of time until June 1, 1987, in which to respond to these interrogatories and requests for documents.

On June 2, 1987, the respondents submitted their answers to the interrogatories and furnished documents in response to the Commission's request. The respondents' submission consists of a substantial amount of information and data. This Office is presently examining and studying this material. Once this examination is completed, this Office will make a further report to the Commission.

Lawrence M. Noble
Acting General Counsel

6/9/87
Date

BY: George F. Rishel
George F. Rishel
Acting Associate General Counsel

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

MEMORANDUM TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/JOSHUA MCFADDEN

DATE: OCTOBER 22, 1987

SUBJECT: OBJECTION TO MURs 2282 & 2314 - GENERAL COUNSEL'S REPORT
SIGNED OCTOBER 20, 1987

The above-captioned document was circulated to the Commission on Wednesday, October 21, 1987 at 4:00 P.M.

Objections have been received from the Commissioners as indicated by the name(s) checked:

Commissioner Aikens _____
Commissioner Elliott X
Commissioner Josefiak _____
Commissioner McDonald _____
Commissioner McGarry _____
Commissioner Thomas _____

This matter will be placed on the Executive Session agenda for October 27, 1987.

Please notify us who will represent your Division before the Commission on this matter.

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BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

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In the Matter of	)	
	)	
National Republican Senatorial Committee	)	MUR 2282
	)	
	)	
Frederick W. Bassinger, as treasurer	)	

GENERAL COUNSEL'S REPORT

The Office of the General Counsel is prepared to close the investigation in this matter as to the National Republican Senatorial Committee, based on the assessment of the information presently available.

1/19/89
Date

Lawrence M. Noble
General Counsel

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SENSITIVE

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

FEDERAL ELECTION COMMISSION
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January 28, 1988

MEMORANDUM

TO: The Commission

FROM: Lawrence M. Noble
General Counsel

SUBJECT: MUR 2282

Attached for the Commission's review is a brief stating the position of the General Counsel on the legal and factual issues of the above-captioned matter. A copy of this brief and a letter notifying the respondent of the General Counsel's intent to recommend to the Commission a finding of probable cause to believe was mailed on January 28, 1988. Following receipt of the respondent's reply to this notice, this Office will make a further report to the Commission.

Attachments

1. Brief
2. Letter to respondents

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RECEIVED
FEDERAL ELECTION COMMISSION
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FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

January 28, 1988

Stuart M. Gerson, Esquire
Epstein, Becker, Borsody
and Green, P.C.
1140 19th Street, N.W.
Washington, D.C. 20036-6601

RE: MUR 2282
National Republican
Senatorial Committee
Frederick W. Bassinger,
as treasurer

Dear Mr. Gerson:

Based on a complaint filed with the Federal Election Commission on October 28, 1986, and information supplied by your clients, the National Republican Senatorial Committee, and Frederick W. Bassinger, as treasurer, the Commission, on April 7, 1987, found that there was reason to believe your clients violated 2 U.S.C. §§434(b), 441a(h), 441d(a) and 11 C.F.R. § 110.6(d)(2), and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find probable cause to believe that violations have occurred.

The Commission may or may not approve the General Counsel's recommendations. Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within 15 days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. (Three copies of such brief should also be forwarded to the Office of the General Counsel, if possible.) The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of whether there is probable cause to believe a violation has occurred.

If you are unable to file a responsive brief within 15 days, you may submit a written request for an extension of time. All requests for extensions of time must be submitted in writing five days prior to the due date and good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

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A finding of probable cause to believe requires that the Office of the General Counsel attempt for a period of not less than 30, but not more than 90 days, to settle this matter through a conciliation agreement.

Should you have any questions, please contact Anne A. Weissenborn, the attorney assigned to handle this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

Enclosure
Brief

3304073278

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
National Republican Senatorial Committee	)	MUR 2282
Frederick W. Bassinger, as treasurer	)	
	)	

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

On April 7, 1987, the Commission found reason to believe that the National Republican Senatorial Committee ("NRSC") and Richard G. Nelson, as treasurer,[1/] had violated 2 U.S.C. § 434(b) and 11 C.F.R. § 110.6(d)(2) by failing to report contributions to candidates for the United States Senate over which, as a conduit, the NRSC had exercised direction or control; 2 U.S.C. § 441a(h) by exceeding the NRSC's contribution limitation of $17,500 per Senatorial candidate during an election year; and 2 U.S.C. § 441d(a) by failing to use a complete or proper disclaimer on certain solicitations. This matter was initiated by a complaint filed on October 28, 1986, by Common Cause.

II. ANALYSIS

A. Factual Background

The particular conduit operation cited in the complaint in this matter was one of five elements in the NRSC's "Direct To" conduit or earmarking program undertaken in 1985-86 in support of

1/ On September 15, 1987, the NRSC filed an amended Statement of Organization designating Frederick W. Bassinger as treasurer.

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Republican candidates for the U.S. Senate. (NRSC response, MUR 2314, page 1). Each of these conduit operations was primarily directed to a different contributor base of the Republican Party. The operations were entitled "Direct To" , "Direct To Auto" (the program at issue here), "Miscellaneous Conduiting," "The Trust Fund," and "Majority '86."

According to the NRSC's response to interrogatories, the predominant element of the Direct-To Auto program was a mailing carried out on or about September 2, 1986 (Attachment 1).[3] This mailing consisted of variations on a solicitation letter bearing the signature of Vice President George Bush. (See Attachment 2 for examples. On the bills submitted to candidates for administrative costs associated with this operation, the program is referred to as "Bush Mailing.") Each version of the letter stated that Republican Senatorial candidates in four named states were "on the verge of running out of money," cited a specific total ($236,500 each) without which they would lose, and requested a specific amount from the solicitee which was to be divided equally among the four candidates. The candidates

3/ Another aspect of the Direct To Auto program involved letters soliciting contributions for specific candidates. These contributions were deposited into the NRSC Direct-To Account and forwarded to the candidates by means of NRSC checks.

themselves were not named. Twelve campaigns were cited in the twenty-four different versions of the letter sent out, although some appeared more often than others. For example, South Dakota appeared in eighteen versions, Nevada and Alabama in twelve and the rest (Arkansas, California, Colorado, Florida, Georgia, Louisiana, Missouri, North Carolina, and Vermont) in six each. (Attachment 1, page 11). The amount of the joint contribution requested of each potential contributor varied from version to version according to the mailing list used, the list in turn reflecting either the prior contribution history of the prospective contributors or the fact that the persons being contacted were prospects, not earlier contributors. The reply forms accompanying the letters in each instance cited as possible amounts the sum requested in the letter, a higher amount, or "other." The form listed the same four states as were named in the letter, and contained the statement, "to make sure our candidates have the funds they need, I'm enclosing the most generous contribution I can to be split equally among them." (Attachment 3). A total of 565,239 letters were mailed, 289,081 to persons who had not previously contributed to the NRSC.

The Direct-To Auto program used in part mailing lists designated "Presidential Task Force," with recipients being asked to make their checks payable to the Task Force. Other solicitations involved in this program went to persons on non-Task Force lists such as "Masterfile," "Inner Circle" and "non-

NRSC"; in these latter instances the contributor's checks were to be made payable to the NRSC or to the "Inner Circle."

As a result of the September 2 mailing, the NRSC received responses from 20,665 contributors whose checks were made payable to the Republican Presidential Task Force, and from 22,706 contributors on the non-Task Force lists whose checks were made payable to the NRSC or to the Inner Circle. A total of $2,340,664 in earmarked contributions was received as a result of this mailing. Counsel for the NRSC notes that the return rate on solicitations using the Republican Presidential Task Force list was less than 12%, while the return on the Masterfile list was 18%, that on the non-NRSC component (prospect list) was 7/10 of 1% and that on the Inner Circle component was less than 5%.

In response to the Commission's interrogatories, counsel for the NRSC stated that "[o]n those occasions where the return form did not have a mark for the amount remitted, [See Attachment 3], the NRSC followed the donor's intent indicated by the rest of the form and divided the check actually received equally among the four candidates listed." Counsel went on to explain that "[o]n a significant number of occasions" the donor apparently intended to earmark the contribution to the NRSC, and that such checks were segregated, placed in an appropriate NRSC account and so reported; however, in certain instances involving $108,086, the intention to contribute to the NRSC was not identified, and the checks were treated as earmarked for candidates. (See infra, page 10.)

The recipient candidates, pursuant to agreements signed in late 1985 or 1986 by themselves or a campaign staff person, agreed to assume their shares of the fundraising costs incurred by the NRSC for the Direct-To Program. (Attachment 4). Under the agreement, the NRSC issued bills once a month to each recipient campaign, the amount charged being determined on a per contribution basis. The NRSC found that the actual average cost to prepare and mail the solicitations involved in the September 2 mailing was $1.52 per piece of certified mail and $1.02 per piece of first class mail or an average direct cost of $1.32, which was then divided by four. Each candidate was thus charged 33 cents for each contribution received. (Attachment 1, page 8).

All contributions received as a result of the Direct-To Auto program were deposited into the NRSC's Direct-To Program Account, as were other contributions received as a result of the NRSC's earmarking solicitations.[4/] Disbursements to candidates were made by means of wire transfers or by checks bearing the heading "National Republican Senatorial Committee and the subheading "Direct To Program." (Attachment 5). These disbursements were apparently accompanied by letters to the recipient committee and

4/ The response to the Commission's questions states that "the NRSC used one discrete-function bank account for processing all donor-directed contributions which were received through the overall earmarking program." A Commission audit of the Friends of Mattingly Committee produced NRSC checks designated "Majority 86" and "Trust Account" which bore account numbers different from that of the "Direct-To Account." There is, however, no evidence in hand that contributions received as a result of the Direct-To Auto program were deposited in other than the Direct-To Account.

to the candidate and by a copy of the relevant NRSC Schedule A's itemizing the contributions involved in support of Line 11A (contributions from individuals). (Attachments 6 and 7). They were not reported as contributions from the NRSC. The NRSC also sent thank you letters to the contributors. (Attachment 8). The recipients were later billed for administrative costs. (Attachment 9). Again in response to the Commission's interrogatories, counsel for the NRSC has stated that "[n]o Republican Senate candidate participated in the planning, approval, implementation, or oversight of the NRSC's earmarking activity," nor did any Republican candidate authorize or approve any specific direct-to mailing, except for their receipt of the agreement letters noted above. (Attachment 1, pages 19-20).

The NRSC has been unable to determine the exact amount transferred to each of the twelve recipient candidates as a result of the September 2 mailing. The figures which are available are for total transfers beginning September 16, 1986; these include not only receipts resulting from the September 2 mailing, but also receipts from other conduit programs such as "Direct-To." The difference between the total Direct-To Auto receipts of $2,340,664 for all twelve candidates and the total transferred from all sources to these twelve candidates was $491,000. (Attachment 1, page 7).

B. Legal Analysis

a. The Act and Regulations

The Federal Election Campaign Act of 1971, as amended ("the Act"), limits to an aggregate of $17,500 the amount of

contributions that a Senate campaign committee, such as the NRSC, may make to a candidate for the U.S. Senate in an election cycle. 2 U.S.C. § 441a(h); 11 C.F.R. § 110.2(c). The Act further provides that any person, which is defined to include a committee, may act as a conduit or intermediary of contributions earmarked for a particular candidate, provided that the conduit or intermediary reports the original source and the intended recipient of such earmarked contributions to the Commission and the intended recipient. 2 U.S.C. § 441a(a)(8); 11 C.F.R. § 110.6.

Commission regulations state that "earmarked means a designation, instruction, or encumbrance (including those which are direct or indirect, express or implied, oral or written) which results in all or any part of a contribution or expenditure being made to, or expended on behalf of, a clearly identified candidate or a candidate's authorized committee." 11 C.F.R. § 110.6(b). Commission regulations require a conduit or intermediary to transmit an earmarked contribution to the intended recipient within 10 days of the conduit's or intermediary's receipt of the contribution. 11 C.F.R. §§ 102.8(a) and (d). The regulations further require that the conduit or intermediary shall report to the Commission and to the intended recipient the identification of each contributor, the amount of the contribution, the date received by the conduit, the intended recipient "as designated by the contributor," the date the contribution was passed on to the intended recipient and whether it was passed on in cash, by the contributor's check, or

by the conduit's check. 11 C.F.R. § 110.6(c). Contributions which pass through the conduit's account are to be disclosed, regardless of amount, on schedules of itemized receipts and expenditures filed with the Commission by the conduit and are to be included in the total receipts and disbursements reported by the conduit. See 11 C.F.R. § 110.6(c)(1)(i).

Commission regulations also provide that a conduit's or intermediary's contribution limits are not affected by passing on earmarked contributions except where the conduit exercises any direction or control over the choice of the recipient candidate. 11 C.F.R. § 110.6(d)(1). The regulations state that if the conduit or intermediary exercises direction or control over the choice of the recipient candidate, the contribution shall be considered a contribution by both the original contributor and the conduit and shall be so reported. 11 C.F.R. § 110.6(d)(2).

b. Earmarking

The first issue to be addressed in the present matter is whether the contributions received by the NRSC in response to its Direct-To Auto program, and then sent on to the twelve candidate committees, were in fact earmarked for those candidates. Pursuant to 11 C.F.R. § 110.6(b), it must be determined whether the contributions received by the NRSC were accompanied by a "designation, instruction or encumbrance " whether "direct or indirect, express or implied," which showed that the contribution was being made to a clearly identified candidate.

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As discussed above, all versions of the NRSC solicitations sent out as part of the September 2 mailings included a form entitled "Emergency Candidate Support Reply," which cited the need for financial assistance on the parts of the four Senate campaigns also named in the solicitation letter, and which contained language regarding an eventual even division of the contribution. Checks were to be made payable to the NRSC, not to the individual campaigns to be benefited.

11 C.F.R. § 100.17 defines "clearly identified candidate" to mean that the name of the candidate appears, there is a photograph or drawing of the candidate, "or the identity of the candidate is apparent by unambiguous reference." In a footnote in Buckley v. Valeo, 242 U.S.C. 1, 43, n.51 (1976), the Supreme Court indicated that a reference to a candidate's status as a candidate, such as to "the senatorial candidate of the Republican Party of Georgia" may be sufficient to clearly identify a candidate.

In the present instance, the names and pictures of the candidates were not provided in the solicitations; rather, only the state in which they were candidates served to identify the intended recipients. Counsel for the NRSC, in a supplemental memorandum submitted with the Committee's response to questions, cites Advisory Opinion 1982-23 as support for the NRSC's identification of suggested recipients by state, party and as "Senate candidates in the election this November," rather than by name. In that opinion, the Commission permitted a committee to

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earmark a contribution to an as yet unselected Republican candidate from the 24th Congressional District of New York. As noted by counsel, the opinion stated, "The Commission has allowed a contribution to be earmarked for an undetermined Federal candidate where the facts indicated that the candidate was identifiable as to specific office, party affiliation, and election cycle." Counsel states, "[T]here can be no doubt that each recipient of the September 2 mailing knew that the solicitation was for Republican candidates in the 1986 elections for the United States Senate, and the targeted races were both clearly identified to and by the recipient in the documents that were exchanged." (Attachment 10, page 3).

The complaint in this matter enclosed copies of newspaper articles quoting several named contributors as saying that they had not earmarked contributions to the candidates to whom they were reported by the NRSC as having contributed. The NRSC has acknowledged that it sent on to candidates $108,086 in contributions which had been earmarked to the NRSC, not for particular campaigns. If, however, the contributions of the individuals cited in the newspaper articles were not included in that $108,086, it would be difficult to argue that the contributors were not informed of the proposed destinations of their contributions, given the language of both the letter and the reply form. Rather, if the contributors had read both of these documents, they would have known that their contributions would be divided as stated therein. There is no evidence that the NRSC

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forwarded the contributions designated for Senatorial campaigns in any way other than that which was explained in the solicitations. Therefore, it is the opinion of the Office of the General Counsel that, with the exception of the contributions expressly earmarked by the contributors for the NRSC, the contributions resulting from the September 2, 1986, mailing were earmarked for Senatorial campaigns, even though it appears that the individual contributors merely ratified the designation or earmarking set out in the NRSC's letters and reply forms.

As stated above, the NRSC has acknowledged transmitting to candidate committees as earmarked contributions $108,086 which had in fact been earmarked for the NRSC itself. Therefore, this Office recommends that the Commission find probable cause to believe that the NRSC violated 2 U.S.C. § 434(b) by misreporting $108,086 in contributions as earmarked for candidates.

c. Direction or Control

The Commission's regulations do not define "direction" or "control" by a conduit. The Commission, however, has addressed the issue of direction or control of earmarked contributions in an advisory opinion and an enforcement matter where the fact patterns partially parallel, but also differ from, the present situation.[5/]

In Advisory Opinion 1980-46 the Commission considered a proposed project in which the National Conservative Political

5/ The Commission has also addressed this issue in several advisory opinions concerning corporate or labor organization communications or the activities of separate segregated funds. See, e.g., Advisory Opinions 1976-92, 1981-57, 1981-21, and 1986-4. NRSC is a political committee without a connected organization. Thus the analyses and conclusions in these opinions are less relevant than the opinions discussed in the body of this brief.

Action Committee ("NCPAC") would undertake a mass mailing suggesting that the recipient send to NCPAC for forwarding a contribution to a specific candidate's committee. The proposed solicitation would suggest that the contributions be in the form of checks made payable to the candidate committee, not to NCPAC.

The Commission cited three factors supporting its determination that NCPAC's activities would not constitute "direction or control." First, the ability of a potential contributor to decide not to contribute was seen as a lack of "control" on NCPAC's part over the selection of a candidate to be supported. Next, NCPAC was under the duty imposed by the Commission's regulations to forward the contributions within ten days of receipt. Finally, NCPAC could not alter the intended recipient or the amount given because the checks were to be made payable to the recipient candidate or that candidate's committee.

MUR 1028 involved mailings sent to supporters of the Council for a Livable World in 1978 suggesting that a contribution be made to one of two named candidates or to the Council itself, the suggested recipient to be dependent upon the contributor's own last initial. Contributions to candidates were to be in the form of checks made payable to the recipient candidate's committee. No amounts were suggested. The General Counsel's brief in that matter, recommending no probable cause to believe a violation had occurred, relied upon the facts that the individual contributors had made the decisions about whether to contribute, and that the contributions were made by means of contributor, not Council,

checks with the result that no changes of recipient or amount could be made by the Council. The checks were not deposited into a Council account.

In the present instance, the NRSC solicited contributions for twelve Senate campaigns, with particular emphasis upon three of the campaigns - those in South Dakota, Nevada and Alabama. According to counsel, "[T]he state groups were determined on the basis of the NRSC's belief that potential contributors would most likely be inclined to assist the candidates with earmarked contributions in those races that were the closest." (Attachment 1, page 10.) Specific amounts were requested, the amount depending upon the mailing list used. Contributors were instructed to make their checks payable to the Republican Presidential Task Force, to the NRSC or to the NRSC's "Inner Circle." All checks received in response to the September 2 mailing apparently were deposited into the NRSC's Direct-To Program Account from which disbursements were made to the campaigns by means of NRSC checks or wire transfers.[6/]

Counsel for the NRSC relies upon two principal bases for arguing that his client did not exercise direction or control over the earmarked contributions here at issue. First, he asserts that "[o]nce the NRSC obtained the contributors' earmarked contributions with the enclosure listing the candidates that the donor intended to receive them, the NRSC's activities were wholly non-discre-

6/ Respondents have stated, in an affidavit signed by Maryanne E. Preztunik, Comptroller of the NRSC, that "[w]ithout exception, earmarked contributions were transferred to their proper recipients within the ten (10) days allowed by law." It is asserted that in most instances the contributions were sent on within forty-eight hours of receipt.

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tionary." Counsel agrees that NRSC offered "initial suggestions and descriptions of the candidates most in need of support," (Attachment 10, page 4) but goes on to assert that "the determinative 'direction' (i.e., the decision to earmark and the execution of that decision by sending the earmarked contribution through the NRSC) was exclusively the donor's. Further, the NRSC could not, and did not, 'control' a donor's making of that decision. And that decision having been made and evidenced, the NRSC could not, and did not, exercise control by changing it." (Attachment 10, pages 4-5).

Counsel also argues that most of the recipients of the NRSC September 2 solicitations did not respond, thereby making "a choice other than that suggested by the NRSC . . . ." (Attachment 10, page 3). "The recipients' ability to reject the NRSC's solicitations and suggestions is, therefore, clearly documented." (Attachment 1, page 18).

Counsel's arguments thus emphasize the solicitees' control over whether or not to contribute and the NRSC's asserted inability to distribute contributions received in a manner other than that indicated on the reply form. These arguments do not, however, address the direction and control inherent in the Direct-To Auto solicitation program as a whole. More importantly, they ignore NRSC's control over the funds received.

The NRSC's involvement in the solicitation of earmarked contributions went beyond mere requests for assistance for certain campaigns. As outlined above, each solicitation letter

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and accompanying reply form used in the NRSC's Direct To Auto program cited Senatorial campaigns in four named states as being virtually without funds, and requested specific sums to be divided among those campaigns. It was the NRSC which decided which races were "closest" and thus which campaigns were most in need of assistance. Even the twelve campaigns selected were not treated equally, the South Dakota campaign having been included in three times the versions of solicitation letters as were nine other campaigns, and the campaigns in Nevada and Alabama in twice as many. Therefore, it appears that many more people were solicited for contributions to the campaigns in South Dakota, Alabama and Nevada than were solicited for the remaining nine, a conclusion which is confirmed by the total amounts of earmarked contributions sent on to candidates (e.g., $153,958.22 to the candidate in Arkansas between September 16 and November 7, 1986, versus $514,180.08 to the candidate in South Dakota during the same time period). (See infra, page 19).[7/]

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7/ As stated above, counsel has noted that the figures in the Committee's response represent transfers of all "donor-directed" contributions to the candidates from the Direct-To Account after September 2, not just those from responses to the September 2 mailings. According to counsel, the amounts transferred during this period exceeded the $2.34 million in proceeds from the September 2 mailing by $491,000. This means that 83% of the funds transferred were the result of the September 2 mailings, a percentage which does not invalidate the premise that more was received from the September 2 mailings for certain campaigns than for others because the more fortunate ones were included in a larger number of solicitation letters.

It is clear that NRSC selected certain campaigns as more in need than others, and that by carefully matching certain campaigns with certain mailing lists, which in turn dictated the amounts requested, the NRSC channelled monies to the selected campaigns, and more to some of them than to others. Although the solicitations did not expressly state that contributions to campaigns in states other than those listed were prohibited, they provided no encouragement for such and did not indicate that any distribution other than a four-way split of a contribution was possible.

The NRSC selected the recipient campaigns, determined goals for the amounts to be transmitted to the various recipients, and suggested to the solicitees specific amounts to contribute. The persons solicited for contributions could, to be sure, choose to give or not to give, but once they chose to give, their contributions were made on terms established by the NRSC from which few if any contributors deviated. The only apparent choice was to give to the campaigns in all four states listed or not to give at all.

Further, unlike the solicitation programs at issue in Advisory Opinion 1980-46 and MUR 1028, the NRSC Direct-To Auto project solicited checks made payable to the NRSC or one of its programs, not to the targeted candidate committees. These checks were then deposited into an NRSC account. The NRSC asserts that it was bound by the designations on the contributors' reply forms to forward equal shares of the amounts given to the Senatorial

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campaigns in the states named, and, with the exception of the $108.086 earmarked for the NRSC discussed above, it appears that the NRSC did distribute the funds according to information on the accompanying reply forms. However, the solicitation of checks payable to the NRSC and the use of an NRSC account to transmit the contributions to the ultimate recipients in fact placed the contributions under the actual control of the NRSC, whether or not that control was ever exercised by changing the recipients or the amounts to be distributed to each.

In summary, the NRSC directed the attention of particular groups of potential contributors to particular races, urged the contribution of specific amounts to reach specified goals, and acquired control over the contributions received by having the checks made payable to itself and by depositing those checks into its own account. This combination of solicitation methods and direct involvement in the flow of funds between the contributors and the recipient committees distinguishes the facts in this matter from those before the Commission in AO 1980-46 and MUR 1028, and clearly constituted "direction or control."

d. Violation of 2 U.S.C. § 434(b) and 11 C.F.R. § 110.6(d)(2)

Once having established that the NRSC directed and/or controlled the earmarked contributions solicited under its "Direct-To Auto" program, it is then necessary to address the ramifications of this direction or control for the NRSC's

reporting obligations under the Act. As stated above, 11 C.F.R. § 110.6(d)(2) requires that a conduit which exercises direction or control over a contributor's choice of a candidate report that contribution as coming from both the contributor and the conduit. In the present instance, the NRSC did not report the contributions received pursuant to the Direct-To Auto September 2 mailing as contributions from itself, but only as coming from the contributors. Therefore, this Office recommends that the Commission find probable cause to believe that the NRSC violated 2 U.S.C. § 434(b) and 11 C.F.R. § 110.6(d)(2) by failing to report as contributions from the NRSC contributions over which the NRSC exercised direction or control.

e. Violation of 2 U.S.C. § 441a(h)

As also stated above, 2 U.S.C. § 441a(h) limits to $17,500 the amount which the Republican or Democratic Senatorial Campaign Committee may contribute to a candidate for nomination for election, or for election, to the Senate during the year in which an election is held for which the recipient is a candiate. This establishes a calendar year limitation of $17,500. Pursuant to 11 C.F.R. § 110.2(e). "[a]ny contribution made by such committee to a Senatorial candidate . . . in a year other than the calendar year in which the election is held shall be considered to be made during the calendar year in which the election is held"

Between September 16, 1986, and November 7, 1986, the NRSC sent multiple checks or wire transfers representing aggregated

earmarked contributions to the twelve targeted campaigns. According to information contained in its quarterly reports, the NRSC also made other contributions to the same campaigns in 1985 and 1986. The following chart shows the totals of the earmarked contributions identified by the NRSC as going to the recipients from the Direct-To Account within the above time frame, other NRSC contributions, the totals attributable to the NRSC, and the resulting amounts by which the NRSC apparently exceeded the $17,500 limitation as a result of the Direct-To Auto program.

State	Earmarked Contributions	Other NRSC Contributions	Total Contributions	Amount in Excess of Limitation
Alabama	$312,568.80	$15,654.00	$328,222.80	$310.722.80
Arkansas	153,958.22	16,813.00	170,771.22	153,271.22
California	151,969.25	1,336.00	153.305.25	135,805.25
Colorado	221,853.00	16,000.00	237,853.00	220,353.00
Florida	159,692.36	15,625.00	175,317.36	157,817.36
Georgia	153,051.27	16,832.00	169,883.27	152,383.27
Louisiana	170,539.65	16,413.00	186,952.65	169,452.65
Missouri	240,534.99	15,424.38	266,088.99	248.588.99
Nevada	371,191.43	15,517.00	386,708.43	369,208.43
North Carolina	185,242.05	15,000.00	200,242.05	182,742.05
South Dakota	514,180.08	16,298.00	530,478.08	512,978.08
Vermont	192,119.00	15,625.00	207,744.00	190,244.00

Given the direction and/or control exerted by the NRSC over the earmarked contributions listed above, it is apparent that the NRSC exceeded its 2 U.S.C. § 44la(h) contribution limitation with regard to the twelve campaigns benefited by the Direct-To Auto Program. Therefore, the Office of the General Counsel recommends that the Commission find probable cause to believe that the NRSC violated 2 U.S.C. § 44la(h).

f. Violation of 2 U.S.C. § 441d

2 U.S.C. § 441d requires that communications soliciting contributions state that they have been paid for and authorized by a candidate, if such is the case. In the present instance, the solicitations used in the NRSC's September 2, 1986 Direct-To Auto mailings bore on the reply forms only the statement that they had been "paid for and authorized by the National Republican Senatorial Committee."

Counsel for the NRSC argues that "the September 2 mailing was not reviewed by the candidates prior to its dissemination and was not specifically authorized or approved by them." Counsel also argues that the payment by the recipient campaigns of mailing costs did not constitute authorization, and that because the payments took place after the mailings were sent, it could not have been said at the time of the mailings that they had been paid for by the candidates. (Attachment 10, pages 6-7).

The beneficiary campaigns were aware that the NRSC would be undertaking solicitations on their behalf and signed agreements regarding future payments associated with those solicitations. As has been explained above, the potential recipients each signed a "Direct-To Program Agreement" in 1985 or 1986 which generally described the overall Direct-To Program and explained the plan to charge campaigns on a "per contributor" basis for the fund-raising costs involved. By signing this agreement, each candidate or other representative of a particular campaign in effect authorized the NRSC's conduit activity on the candidate's

behalf; i.e., the letters of agreement constituted authorizations by the candidate committees of the NRSC to undertake solicitations for the benefit of the campaigns. Whether or not the committees saw and/or authorized the specific solicitation letters mailed on September 2, 1986, is not dispositive. Rather, it was the blanket authorization which compelled the inclusion of language in the disclaimers that the solicitations had been authorized by the candidates in the states listed, pursuant to 2 U.S.C. § 441d(a)(2).[8/] In addition, although the recipient candidates ultimately paid only for the portions of the solicitations from which they actually benefited by receiving contributions, at the time the solicitations were mailed, the candidates or their representative had signed agreements with the NRSC to pay shares of the solicitation costs. It is the position of this Office that these agreements were sufficient to require the statement that the solicitation materials were paid for by the campaigns cited in the solicitation letters.

This Office recommends that the Commission find probable cause to believe that the NRSC violated 2 U.S.C. § 441d(a)(1).

8/ Pursuant to 11 C.F.R. § 110.7(b)(4), party committees may not make independent expenditures on behalf of federal candidates in general elections. Therefore, even without the letters of agreement, NRSC's solicitations would be deemed to have been authorized by the benefited candidates.

RECOMMENDATION

1. Find probable cause to believe that the National Republican Senatorial Committee violated 2 U.S.C. §§ 434(b), 441a(h), and 441d(a)(1) and 11 C.F.R. § 110.6(d)(2).

1/28/88
Date

Lawrence M. Noble
General Counsel

Attachments

1. Response to Questions and Requests for Information - NRSC
2. Sample solicitation letters (2)
3. Sample contributor reply forms (2)
4. Direct-To Program Agreement
5. Sample check
6. Sample letters to recipient committee and to candidate
7. Sample Schedule A
8. Sample thank-you letter
9. Sample invoice
10. Supplemental Memorandum - NRSC

8204073200

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
88 FEB 12 PM 2:13

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P.C. NEW YORK, WASHINGTON, D.C.
CONNECTICUT AND VIRGINIA ONLY

February 9, 1988

Anne A. Weissenborn, Esquire
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 2282
National Republican Senatorial Committee
Frederick W. Bassinger, as treasurer

Dear Ms. Weissenborn:

Pursuant to our telephone discussion of earlier today, I write on behalf of the respondents to request a 60-day extension of time within which to file a brief in response to the General Counsel's Brief recommending a Commission finding of probable cause. That brief was received by me on February 1, 1988, and so the response is presently due on or before February 16th. With the requested extension, the response would then be due on or before Monday, April 16, 1988.

There are two reasons for the requested extension. First, the General Counsel's Brief (at 5, n.4) raises a new matter relating to the audit of the principal campaign committee of one of the recipients of donor-directed contributions and the account of the National Republican Senatorial Committee through which those contributions were transmitted.

While not central to the General Counsel's recommendation itself, this matter is something which respondents believe merits their review of the underlying factual materials and, if then deemed appropriate, a response. Accordingly, I asked you for the opportunity to examine pertinent documents and other information concerning the audit in question. You then stated that, after the necessary inquiry, you would respond to this request.

Second, because the matter in question dates back to a previous election cycle, it is necessary for me to consult with various key persons who no longer are agents of respondents. These persons are often travelling in their current activities and additional time is therefore necessary to obtain key facts and allow involved individuals the chance to review the submissions which concern them.

Thank you for your consideration.

Sincerely,

Stuart M. Gerson

Stuart M. Gerson

SMG:gj

cc: Benjamin Ginsburg, Esquire

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RECEIVED
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OFFICE OF GENERAL COUNSEL

88 FEB 29 AM 12:05

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CONNECTICUT AND VIRGINIA ONLY

February 29, 1988

HAND DELIVER

Anne A. Weissenborn, Esquire
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 2282
National Republican Senatorial Committee
Frederick W. Bassinger, as treasurer

Dear Ms. Weissenborn:

It is my understanding that the matter of respondents' pending request for an extension of time until April 16, 1988, within which to file a brief in response to the General Counsel's recommendation of a probable cause finding is on the Commission's calendar for tomorrow, March 1, 1988. One of the principal reasons for that request was the General Counsel's reliance on an audit that is not yet on the public record.

Recently, you provided information concerning four checks, but you have not disclosed anything further, especially the audit document itself. As I mentioned to you, the information now available does not give us a sufficient basis to make a comprehensive and meaningful response. Respondents therefore reiterate their request to examine the full audit file before responding to the Commission, and ask that this be considered by

the Commission in conjunction with respondents' request for an extension of time within which to file their brief. And, for all of the reasons previously set forth, respondents also renew their application for the extension.

Yours very truly,

Stuart M. Gerson

Stuart M. Gerson

SMG:gj
cc: Benjamin Ginsburg, Esquire

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FEDERAL ELECTION COMMISSION
88 FEB 18 PM 3:47
EXECUTIVE SESSION
MAR 01 1988
SENSITIVE

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

February 18, 1988

MEMORANDUM

TO: The Commission

FROM: Lawrence M. Noble
General Counsel

SUBJECT: MUR 2282 - Request for Extension of Time to File Response Brief

By letter dated February 9, 1988, which was received by this Office on February 12, 1988, counsel for the National Republican Senatorial Committee ("NRSC") and Frederick W. Bassinger, as treasurer, has requested an extension of 60 days in which to respond to the General Counsel's Brief in MUR 2282. This request is based upon the asserted necessity of reviewing information contained in a footnote in the General Counsel's Brief concerning accounts used by the NRSC for transmitting earmarked contributions, and upon the need to consult with key persons who are not now agents of the respondents and who are presently involved in campaigns outside the Washington area.

This Office recommends that the Commission deny the requested extension of 60 days, but grant a lesser extension which would end two weeks after the date on which the attached letter is mailed. As acknowledged by counsel, clarification of the exact NRSC accounts used to transfer earmarked contributions has no bearing upon resolution of the issues involved in MUR 2282. Those issues themselves are more legal than factual in nature, thus reducing the need for extensive consultations with numerous former agents of the NRSC. Finally, the Commission is under an order of the U.S. District Court for the District of Columbia in Civil Action NO. 87-2224 to inform the court of the time needed to reach a final decision in MUR 2282 after receipt of the respondents' brief. The Commission is also required by the court to update continuously its chronology in the case, thereby keeping the court apprised of the present status of this matter. Thus, a grant of an inordinate extension of time to respondents for filing their brief might have to be justified to the court.

RECOMMENDATIONS

1. Deny the request of counsel for respondents for a 60 day extension of time within which to file a reply brief in MUR 2282.

2. Grant to respondents in MUR 2282 an extension of time of two weeks within which to file a reply brief, such time to begin upon receipt of the attached letter.

3. Approve attached letter.

Attachments

1. Request for Extension of Time
2. Letter

2204073200

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/JOSHUA MCFADDEN

DATE: FEBRUARY 22,1988

SUBJECT: OBJECTION TO MUR 2282 - General Counsel's Memorandum to the Commission dated Feb., 18, 1988

The above-captioned document was circulated to the Commission on Friday, February 19, 1988 at 12:00 P.M.

Objections have been received from the Commissioners as indicated by the name(s) checked:

Commissioner Aikens	X
Commissioner Elliott	X
Commissioner Josefiak	
Commissioner McDonald	
Commissioner McGarry	
Commissioner Thomas	

This matter will be placed on the Executive Session agenda for March 1, 1988.

Please notify us who will represent your Division before the Commission on this matter.

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Submitted Late

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

EXECUTIVE SESSION
MAR 01 1988

February 29, 1983

MEMORANDUM

TO: The Commission

FROM: Lawrence M. Noble
General Counsel

SUBJECT: MUR 2282 - Letter from Counsel

Attached for the Commission's consideration is a letter from counsel for the National Republican Senatorial Committee related to the Committee's request for an extension of time in which to respond to the General Counsel's Brief in MUR 2282. This Office asks that the rules regarding the placing of documents on the Commission's agenda be suspended so that this letter may be included in the discussion of the Committee's request during the Executive Session of March 1, 1988. .

Attachment

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88 FEB 29 AM 12:05

February 29, 1988

HAND DELIVER

Anne A. Weissenborn, Esquire
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 2282
National Republican Senatorial Committee
Frederick W. Bassinger, as treasurer

Dear Ms. Weissenborn:

It is my understanding that the matter of respondents' pending request for an extension of time until April 16, 1988, within which to file a brief in response to the General Counsel's recommendation of a probable cause finding is on the Commission's calendar for tomorrow, March 1, 1988. One of the principal reasons for that request was the General Counsel's reliance on an audit that is not yet on the public record.

Recently, you provided information concerning four checks, but you have not disclosed anything further, especially the audit document itself. As I mentioned to you, the information now available does not give us a sufficient basis to make a comprehensive and meaningful response. Respondents therefore reiterate their request to examine the full audit file before responding to the Commission, and ask that this be considered by

9204073299

the Commission in conjunction with respondents' request for an extension of time within which to file their brief. And, for all of the reasons previously set forth, respondents also renew their application for the extension.

Yours very truly,

Stuart M. Gerson

Stuart M. Gerson

SMG:gj
cc: Benjamin Ginsburg, Esquire

2204073910

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
National Republican Senatorial Committee and Frederick W. Bassinger, as treasurer	)	MUR 2282

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of March 1, 1988, do hereby certify that the Commission decided by a vote of 6-0 to reject the recommendations contained in the General Counsel's February 18, 1988 report on MUR 2282 and instead direct the Office of the General Counsel to take the following actions:

1. Inform the respondent by telephone on March 1, 1988, that the Commission will grant a thirty-day extension beginning March 1, 1988, in which to respond to the General Counsel's brief in MUR 2282.

2. Send an appropriate letter.

Commissioners Aikens, Elliott, Josefiak, McDonald, McGarry, and Thomas voted affirmatively for the decision.

Attest:

3/2/88
Date

Marjorie W. Emmons
Marjorie W. Emmons
Secretary of the Commission

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 3, 1988

Stuart M. Gerson, Esquire
Epstein Becker and Green, P.C.
1140 19th Street, N.W.
Washington, D.C. 22036

RE: MUR 2282
National Republican Senatorial Committee
Frederick W. Bassinger, as treasurer

Dear Mr. Gerson:

This is in response to your letter dated February 9, 1988, requesting an extension of sixty days in which to respond to the General Counsel's Brief in the above-cited matter. The Commission has considered your request and has granted a thirty-day extension beginning March 1, 1988.

In response to your request to examine the audit file relative to footnote 4 in the General Counsel's Brief, we are enclosing copies of four NRSC checks which constituted the basis for the statements in that footnote concerning NRSC accounts used to process donor-directed contributions. The footnote was intended to be solely informational.

If you have any questions, please contact Anne A. Weissenborn, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

Enclosure

2204073291 2

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
	)	
	)	MUR 2282
National Republican Senatorial Committee	)	
Frederick W. Bassinger, as treasurer	)	

SENSITIVE
EXECUTIVE SESSION
MAY 03 1988

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On April 7, 1987, the Commission found reason to believe that the National Republican Senatorial Committee ("NRSC") and Richard G. Nelson, as treasurer, had violated 2 U.S.C. §§ 434(b), 441a(h), and 441d(a), and 11 C.F.R. § 110.6(d)(2). On September 15, 1987, the NRSC filed an amended Statement of Organization designating Frederick W. Bassinger, as treasurer.

Following the issuance of a subpoena for documents and an order for answers to written questions, and the receipt of responses thereto, a General Counsel's Brief was forwarded to respondents on January 28, 1988. A request for an extension of time of sixty days in which to respond to the General Counsel's Brief was received on February 12, 1988, and the Commission determined on February 18 to grant an extension to March 31, 1988. Respondents' Brief was received on April 7 and forwarded to the Commission.

II. ANALYSIS (See General Counsel's Brief of January 28, 1988)

A. Direction or Control

There is no dispute between this Office and respondents over the facts in this matter. Therefore, the issue before the

Commission as regards the Direct-To Auto program as a whole is whether, pursuant to 11 C.F.R. § 110.6(d)(2), the NRSC directed or controlled the selection of candidates for which contributions were solicited.

Counsel for respondents argues, in the Brief for Respondents as earlier, that the "determinative questions" are whether the recipient of an NRSC mailing were presented with and made a choice "independent of the NRSC," and whether that choice could be "countermanded" by the NRSC. Counsel argues that the NRSC could properly suggest and describe candidates most in need, but that the "determinative 'direction'" of the contribution was the donor's, "and the NRSC could not 'control' a donor's making of that decision" nor change that decision afterwards. Counsel finds "immaterial" to "direction or control" any NRSC influence over the decision made or the numbers of persons asked to make that decision.

As is set forth in the General Counsel's Brief, this Office finds the nature and extent of the NRSC's influence over the prospective donors' choices to have been not only material but crucial to the issue of direction or control in this matter. Any prospective contributors to political campaigns are presented with two different choices, to give or not to give, and to whom to give. In the present matter it is true that those solicited could decide not to contribute at all, but once a contributor decided to respond positively to the NRSC's solicitation, he or she was not presented with a choice other than to contribute to the candidates running in the four states named in the solicitation materials. Thus the NRSC's Direct-To Auto program

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was carefully designed to channel receipts in ways determined by the NRSC itself, proof of NRSC "direction," and, in fact, "control" over the second level of choice faced by the contributors.

Counsel also argues, with regard to the use of the NRSC's own account, that the "determinative question is whether or not the putative conduit countermanded the donor's earmarking intent." As is stated in the General Counsel's Brief, it is the position of this Office that the NRSC exerted actual control over the contributions once they were deposited into an NRSC account, with attendant possibilities for altering the amount and the timing of their distribution even though those possibilities were apparently not utilized.

This Office recommends that the Commission find probable cause to believe that the NRSC and Frederick W. Bassinger, as treasurer, violated 2 U.S.C. § 434(b) and 11 C.F.R. § 110.6(d)(2) by failing to report as contributions from the NRSC contributions over which the NRSC exercised direction or control, and 2 U.S.C. 441a(h) by exceeding the limitation imposed by that statutory provision upon contributions by the NRSC to Senatorial candidates.

B. Misreporting of Contributions

Counsel does not dispute the statement by this Office in the General Counsel's Brief that the NRSC violated 2 U.S.C. § 434(b) by misreporting $108,086 in contributions as earmarked for candidates rather than as contributions to the NRSC. (See, General Counsel's Brief, pages 10-11.)

C. Disclaimers

The Brief of Respondents reiterates earlier arguments that the disclaimers on the September 2, 1986, NRSC solicitation letters were sufficient. Counsel argues that it would have been erroneous to state that the campaigns cited by state in the solicitation letters had authorized the specific letters at issue because they had neither reviewed nor authorized them prior to mailing. The position of this Office continues to be that the letters of agreement signed in 1985 and 1986 with regard to the overall Direct-To program constituted authorization by the candidates' committees of the NRSC's subsequent solicitations.

Counsel also argues that, at the time the solicitations were mailed, no candidate had paid any of the costs because the amount of any such payment was to be determined only after responses to the solicitations has been received. This emphasis, however, disregards the fact that the candidates had earlier agreed to pay on a per contributor basis, thereby obligating themselves to pay portions of the solicitation costs in amounts yet to be determined. This obligation before the fact sufficed to necessitate the statement in each solicitation letter that the campaigns to be benefited had paid for the solicitation. 1/

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1/ Counsel disputes footnote 8 in the General Counsel's Brief by stating that at the time of the solicitation "no expenditure had been made on behalf of any candidate. Because the receipt of an earmarked contribution entirely depended upon the recipients' decision, and because that decision could not be made until the mailing had been received by the contributor, no authorized,

RECOMMENDATIONS

1. Find probable cause to believe that the National Republican Senatorial Committee, and Frederick W. Bassinger, as treasurer, violated 2 U.S.C. § 434(b), 2 U.S.C. § 441a(h), 2 U.S.C. § 441a(d), and 11 C.F.R. § 110.6(d)(2).

2. Approved the attached conciliation agreement and letter.

4/21/88
Date

Lawrence M. Noble
General Counsel

Attachments

1. Conciliation Agreement
2. Letter

2 0 0 3 6 3 0 0 1 7

(Footnote 1 continued)
allocable event could have taken place until the NRSC, as conduit, obtained the contributor's instructions and check." (Brief of Respondents, page 9.)

This statement, together with the fact that the NRSC considered the costs of successful solicitations not paid for by the recipient committees to be coordinated expenditures on behalf of those campaigns, indicates that Respondents consider only the costs of successful solicitations be actual or potential in-kind contributions. Since the costs of the unsuccessful solicitations were incurred equally for purposes of influencing Federal elections, this Office cannot agree with Respondents' position; however, the costs of the solicitations involved in the Direct-To Auto program are not before the Commission in the present matter.

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 6, 1988

Stuart M. Gerson, Esquire
Epstein Becker Borsody and Green, P.C.
1140 19th Street, N.W.
Washington, D.C. 20036-6601

RE: MUR 2282
National Republican
Senatorial Committee
Frederick M. Bassinger,
as treasurer

Dear Mr. Gerson:

On May 3, 1988, the Commission instructed this Office to request of your clients certain additional information concerning two fact situations involved in MUR 2282. The first of these involves the $108,086 in contributions earmarked for the NRSC which was sent on to candidates, while the second concerns the costs of the portion of the September 2, 1986, Direct-To Auto solicitation which did not result in the receipt of contributions. Information is also requested concerning the coordinated expenditure limitations available to the NRSC as regards the twelve Senatorial campaigns benefited by the 1986 Direct-To Auto Program.

Please provide answers to the following inquiries:

1. Identify the candidates who received the contributions included in the $108,086 which were earmarked for the NRSC and the amounts received by each candidate.

2. It is the understanding of this Office that of the $672,000 total cost of the September 2, 1986, solicitation, $62,909 was either reimbursed by the recipient candidate committees or charged to the NRSC's Section 441a(d) limitations. It is understood that this $62,909 represents the sum of the amounts billed each recipient candidate committee based upon the numbers of contributions received. Was the remaining $610,891 ever allocated as contributions in-kind to the recipient candidate committees? If not, how were those expenditures reported?

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3. What would be a reasonable allocation among the twelve recipient candidate committees of the $610,891 in Direct-To-Auto solicitation costs which did not result in the receipt of contributions?

4. It is the understanding of this Office that the Republican state committees in all of the states involved in the Direct-To Auto Program, except South Dakota, assigned their Section 441a(d) limitations to the NRSC for their respective 1986 Senatorial campaigns. For certain states the reports filed by the NRSC indicate that that committee spent the maximum amount under both its own and the state parties' limitations; however, in the states of California, Florida, Georgia, Nevada, and North Carolina, it appears that varying amounts of the limitations were not utilized. Please confirm whether the NRSC was in fact assigned some or all of the state parties' Section 441a(d) limitations in the twelve states involved in the Direct-To Auto Program, provide the percentage of that limitation assigned in each instance, and state the amounts, if any, of the limitations available to, but not utilized by, the NRSC.

It is requested that your clients provide answers to the above questions within 10 days of your receipt of this letter or that you inform this Office of any difficulties foreseen or experienced in gathering the requested information.

Thank you for your cooperation.

Sincerely,

Lawrence M. Noble
General Counsel

2046736169

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

May 26, 1988

Stuart M. Gerson, Esquire
Epstein, Becker, Borsody
and Green, P.C.
1140 19th Street, N.W
Washington, D.C. 20036-6601

RE: MUR 2282
National Republican
Senatorial Committee
Frederick M. Bassinger,
as treasurer

Dear Mr. Gerson:

On May 6, 1988, this Office mailed a letter to you as counsel to the above-cited respondents, in which were posed a number of questions raised by the Commission during its consideration of MUR 2282 on May 3, 1988. It was requested that answers to these questions be provided within 10 days of your receipt of this letter, which we understand took place on or about May 8, 1988.

This Office has just received an order signed by Judge Gerhard A. Gesell, dated May 20, 1988, in Common Cause v. Federal Election Commission, Civil Action No. 87-2224 (D.D.C. filed Aug. 12, 1987). The order states that unless a decision is reached in MUR 2282 by August 1, 1988, "a factual hearing comporting with standards set by Federal Election Commission v. Rose, 806 F.2d 1081 (D.C. Cir. 1986) will be scheduled." Therefore, it is in the interest of all concerned to speed the resolution of MUR 2282. The information requested in this Office's letter of May 6 is necessary to that resolution. For that reason we urge your clients' timely cooperation in supplying such.

Sincerely,

Lawrence M. Noble
General Counsel

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June 8, 1988

HAND DELIVER

Lawrence M. Noble
General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 2282
National Republican Senatorial Committee
Frederick M. Bassinger, as treasurer

Dear Mr. Noble:

The Federal Election Commission ("Commission") has propounded certain additional questions to the National Republican Senatorial Committee ("NRSC") in the above-captioned Matter Under Review, concerning the NRSC's 1986 Direct-To Auto Program. Those answers are as follows:

1. The candidates who received contributions included in the $108,086 which were earmarked for the NRSC, and the amounts they received were:

Candidate	Amount
Abdnor	$24,887
Broyhill	$24,887
Santini	$24,887
Snelling	$24,887

Please note, the above listings do not account for $8,578 of the $108,086 total. The information concerning the distribution of that amount is not readily available because of the absence of the particular NRSC employee who has access to it. In the interest of forestalling delay, we submit the information now available and we shall supplement this letter as soon as possible to give the Commission the additional information requested.

2. Of the cost of the September 2, 1986 mailing that was not billed to the committees of recipient candidates, no allocation as in-kind contributions was made. For the reasons previously stated and discussed again at 3. infra, no such further allocation was warranted.

Those expenditures were in fact reported to the Commission and are reflected in the NRSC's listed payments to the vendors who performed the services (e.g., mailing, printing, etc.) in the subject program.

3. As the NRSC described in its Responses to Questions and Requests for Information, previously submitted, the share of the costs allocated to the recipient candidates was made on the basis of each contribution to that candidate that was received. Prior to that receipt, no candidate had participated in the planning, approval, implementation, or oversight of the mailing. We therefore submit that the allocation decision made by the NRSC was a reasonable one.

4. The NRSC was assigned 100 percent of all 12 states' (including South Dakota's) Section 441a(d) limitations. The non-utilized amounts are as follows:

State	Cash	Coordinated
California	$ 1.88	$41,277.53
Florida	246.24	56,152.89
Georgia	-0-	775.13
Nevada	1,833.62	249.06
North Carolina*	1,376.00	3,540.31

* Single limits

We hope that this information is sufficient to answer the Commission's inquiries and remain available to provide additional information upon request.

Sincerely,

Stuart M. Gerson

Stuart M. Gerson

SMG:gj
cc: Anne A. Weissenborn, Esquire

CCC#9546

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June 20, 1988

HAND DELIVER

Lawrence M. Noble
General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 2282
National Republican Senatorial Committee
Frederick M. Bassinger, as treasurer

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Dear Mr. Noble:

This will supplement our letter of June 8, 1988, in the above-referenced Matter Under Review.

In numbered paragraph 1 of that letter, we provided an apportionment of $99,548 of the $108,086 in contributions which were earmarked for the National Republican Senatorial Committee. This left an undelineated balance of $8,538, which we now are able to say was transmitted as follows:

Candidate	Amount
Bond	$2,902.92
Snelling	$2,817.54
Zschau	$2,817.54

Thank you for your consideration.

Sincerely,

Stuart M. Gerson

Stuart M. Gerson

SMG:gj

cc: Anne A. Weissenborn, Esquire

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

SENSITIVE

June 27, 1988

MEMORANDUM

TO: The Commission

FROM: Lawrence M. Noble
General Counsel

SUBJECT: MUR 2282

Attached for the Commission's review is a supplemental brief stating the positions of the General Counsel on legal and factual issues raised during the Commission's discussion on May 3, 1988, of the General Counsel's Brief and Report in this matter dated January 28, 1988, and April 21, 1988. A copy of this supplemental brief was mailed to counsel for the respondents on June 24, 1988. Following receipt of the respondents' reply to this notice, this Office will make a further report to the Commission.

Attachments

1. Supplemental brief
2. Letter

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 24, 1988

HAND DELIVERED
Stuart M. Gerson, Esquire
Epstein, Becker, Borsody and Green, P.C.
1140 19th Street, N.W.
Washington, D.C. 20036-6601

RE: MUR 2282
National Republican
Senatorial Committee
Frederick W. Bassinger,
as treasurer

Dear Mr. Gerson:

On January 28, 1988, this Office forwarded to you the General Counsel's Brief in MUR 2282 which contained recommendations that the Commission find probable cause to believe that the National Republican Senatorial Committee ("NRSC") and Frederick W. Bassinger, as treasurer, had violated 2 U.S.C. §§ 434(b), 44la(h), and 44ld(a)(1), and 11 C.F.R. § 110.6(d)(2). The Brief of Respondents responding to the General Counsel's Brief and to the recommendations contained therein was received on April 7, 1988.

The Commission on May 3, 1988, requested that additional information be sought concerning certain fact situations involved in this matter. On that same date the Commission also directed this Office to prepare a supplemental brief addressing those issues.

Having received your clients' responses to the questions posed pursuant to the Commission's instructions, this Office now submits for your review a supplemental brief stating the General Counsel's positions on the legal and factual issues about which additional information was requested, and also on an additional issue involving the reporting of expenditures made pursuant to 2 U.S.C. § 44la(d) which has arisen as a result of the responses filed. This supplemental brief addresses related and additional bases for the original recommendations of this Office that the Commission find probable cause to believe that the NRSC had violated 2 U.S.C. §§ 434(b) and 44la(h).

Within 15 days of your receipt of this notice you may file with the Secretary of the Commission a brief (ten copies if possible) stating your clients' positions on these issues and replying to the supplemental brief of the General Counsel. (Three

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copies of the brief should also be forwarded to the Office of the General Counsel, if possible.) The General Counsel's supplemental brief and any response which you may submit will be considered by the Commission before proceeding to a vote of whether there is probable cause to believe violations have occurred.

If you are unable to file a responsive brief within 15 days, you may submit a written request for an extension of time. All requests for extensions of time must be submitted in writing five days prior to the due date, and good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.
Page 2

Should you have any questions, please contact Anne A. Weissenborn, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

Enclosure
Supplemental Brief

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 2282
National Republican Senatorial Committee)
Frederick W. Bassinger, as treasurer)

GENERAL COUNSEL'S SUPPLEMENTAL BRIEF

I. STATEMENT OF THE CASE

On May 3, 1988, the Commission considered the issues being addressed in the present matter plus the recommendations in the report of the General Counsel dated April 21, 1988, and voted to return the latter report to the Office of the General Counsel for further investigation and the preparation of a supplemental brief. The subjects concerning which further information was to be sought were (1) the identities of the candidate committees which received the $108,036 earmarked by contributors for the NRSC itself and the amount received by each, (2) the reporting and appropriate allocation of expenditures related to Direct-To Auto solicitations which did not result in the receipt of contributions to be forwarded to candidates, and (3) the amounts expended by the NRSC pursuant to 2 U.S.C. § 441a(d) on behalf of the twelve candidates which received the earmarked contributions involved in this matter.

On May 6, 1988, this Office sent to counsel for respondents a letter containing the inquiries which had been requested by the Commission. Counsel's responses were received on June 8 and 20, 1988. (Attachment 1). The following is an analysis of those responses. This Supplemental Brief also incorporates by reference the General Counsel's Brief previously sent to respondents in this matter.

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A. Distribution of $108,086

According to counsel, the $108,086 in contributions earmarked for the NRSC, but forwarded to candidate committees, was distributed as follows:

Candidate	State	Amount
Abdnor	South Dakota	$24,887
Bond	Missouri	2,902.92
Broyhill	North Dakota	24,887
Santini	Nevada	24,887
Snelling	Vermont	27,704.54
Zshau	California	2,817.54
	Total	$108,086.00

In the original General Counsel's Brief in this matter dated January 28, 1988, figures were included at page 19 for the total amounts of earmarked contributions forwarded to the twelve recipient candidate committees from the Direct-To Account between September 16, 1986 and November 7, 1986. The $108,086 in non-earmarked contributions forwarded to the above-listed campaigns was included in the figures provided by the respondents for the amounts forwarded to each campaign pursuant to the Direct-To program beginning September 16, 1986. The General Counsel's Brief also listed at page 19 "Other Contributions" made by the NRSC to these candidates, the combined totals of the earmarked contributions and the other contributions, and the amounts by which the NRSC apparently had exceeded the $17,500 limitations established at 2 U.S.C. § 441a(h).

A similar chart including only distribution of the non-earmarked contributions totalling $108,086 produces the following results:

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State	Earmarked for NRSC	Other Reported NRSC Contributions	Total NRSC Contributions	Amount in Excess of Limitation
California	$ 2,817.54	$ 2,496 1/	$ 5,313.54	$ -0-
Missouri	2,902.92	16,615	19,517.92	2,017.92
North Carolina	24,887	15,000	39,887	22,387
South Dakota	24,887	16,718	41,605	24,105
Nevada	24,887	15,666	40,553	23,053
Vermont	27,704.54	16,230	43,934.54	26,434.54
			Total	$97,997.46

The figures given above demonstrate that with regard to the $108,086 in contributions earmarked by the contributors for the NRSC but distributed to candidates, the NRSC exceeded its 2 U.S.C. § 441a(h) limitation of $17,500 per Senatorial candidate by a total of $97,997.96 with regard to the campaigns in North Carolina, South Dakota, Nevada and Vermont. The Committee also misreported these contributions as coming from the individuals, not as contributions from itself, in violation of 2 U.S.C. § 434(b).

B. Allocation of Solicitation Costs

The second issue for which additional information has been sought concerns the portion of the cost of the Direct-To Auto Solicitation dated September 2, 1986, for which the recipient candidate committees were not billed. According to information supplied in response to the Commission's interrogatories, the total cost of the September 2, 1986 mailing was $670,000. Of this amount,

1/ Certain figures in this column differ from those in the comparable column on page 19 of the General Counsel's Brief as the result of the application of a more detailed computer search.

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$52,909 was reimbursed by the candidate committees which received the contributions generated by this mailing, the reimbursements having been made in response to NRSC billings. Each committee was charged $.33 per contribution forwarded by the NRSC. The benefited committees were not charged for the portion of the solicitation costs which did not result in the receipt of contributions; i.e., the NRSC absorbed $610,891 in costs related to unsuccessful solicitations.

It has been, and continues to be, the position of the NRSC that no allocation is required of the costs of unsuccessful solicitations. In his discussion in the Brief of Respondents dated April 7, 1988, concerning the asserted accuracy of the NRSC's disclaimer on the solicitation materials, counsel stated,

> At the time the solicitation was made, no expenditure had been made on behalf of any candidate. Because the receipt of an ear-marked contribution entirely depended upon the recipient's decision, and because that decision could not be made until the mailing had been received by the contributor, no authorized, allocable event could have taken place until the NRSC, as conduit, obtained the contributor's instruction and check.

More recently, in response to questions posed by this Office concerning the allocation of costs related to unsuccessful solicitations, counsel states that "[o]f the cost of the September 2, 1986 mailings that was not billed to the committees of recipient candidates, no allocation as in-kind contributions was made." Counsel explains that such costs were reported by the NRSC as payments to vendors and states further, "Prior to [the] receipt [of a contribution], no candidate had participated in the planning, approval, implementation, or oversight of the

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mailing. We therefore submit that the allocation decision made by the NRSC was a reasonable one." (Attachment 1, page 2).

11 C.F.R. § 106.1(a) states that as a general rule "expenditures . . . made on behalf of more than one candidate shall be attributed to each candidate in proportion to, and shall be reported to reflect, the benefit reasonably expected to be derived." 11 C.F.R. § 106.1(c)(1) provides that expenditures for fund-raising need not be attributed to individual candidates "unless these expenditures are made on behalf of a clearly identified candidate and the expenditure can be directly attributed to that candidate." 11 C.F.R. § 106.1(d) defines "clearly identified" to mean either that the candidate's name appears, a photograph or drawing of the candidate appears, or "the identity of the candidate is apparent by unambiguous reference." As noted in the General Counsel's Brief with regard to parallel language at 11 C.F.R. § 100.17, the United States Supreme Court has indicated that a reference to a candidate's status as a candidate, including "the senatorial candidate of the Republican Party of Georgia" may be enough to clearly identify such candidate." Buckley v. Valeo, 242 U.S. 1, 43, n. 51 (1976).

2 U.S.C. § 431(8)(A) and 11 C.F.R. § 100.7(a)(1) define "contribution" to mean "any gift, . . . loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for Federal office." 11 C.F.R. § 100.7(iii)(A) defines "anything of value" as including all in-kind contributions, and states that "the provision of any goods or services without charge . . . is a contribution."

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To determine in the present matter whether the costs borne by the NRSC for unsuccessful solicitations made through its Direct-To Auto program should be allocated as in-kind contributions to the twelve Senatorial campaigns involved, it is necessary to establish that the costs were incurred for purposes of influencing Federal elections, that there were benefits derived by the candidate committees, and that the expenditures resulting in those benefits can be directly attributed to clearly identified candidates.

All of the solicitation letters mailed as part of the Direct-To Auto program on September 2, 1986, and signed by Vice President George Bush began with statements that "[o]ur Republican Senate candidates in [four named states] are on the verge of running out of money. And if these candidates don't receive emergency funding fast, they'll be defeated on November 4th. President Reagan and I have discussed this situation and we're both very concerned. Because a shift in just 4 seats will give control of the Senate back to the Democrats." (Emphasis in original.) (Attachment 2). These statements, and others later in the letters, were clearly Federal election-related.

It is apparently the respondents' position that solicitations by a third party which produce no contributions are of no benefit to a candidate committee - that only solicitation expenditures which produce income can be deemed to be of assistance to, and made on behalf of, that candidate. This argument ignores the fact that if any of the candidate committees

involved had undertaken a solicitation program comparable to the NRSC's Direct-To Auto effort, that committee would have paid for both successful and unsuccessful solicitation costs. The candidate committees thus benefited considerably from being relieved of the financial burden of unsuccessful solicitations. Further, the solicitation letters, with their emphasis upon the issue of Senate control, contained an electioneering message beyond the request for financial assistance. Something of value was thus indeed provided by the NRSC to each of the Senatorial campaigns cited in the letters whether or not a contribution resulted, something of value which constituted an in-kind contribution on behalf of each of the candidates whose campaigns were cited in the solicitation letters.

Finally, the candidates who derived benefit from the soliciations were "clearly identified." As noted above, the Commission's regulations, and the United States Supreme Court, do not require that candidates be identified by name. Identification by political party, office and state is sufficient, and all of this information was included in the September 2, 1986, letters.

In summary, the costs of the NRSC's September 2, 1986, mailings were allocable among the candidates whose campaigns were cited therein, whether or not the solicitations resulted in contributions to be forwarded to the candidate committees. By failing to allocate and report the costs of the unsuccessful solicitations as contributions to the candidate committees, the NRSC violated 2 U.S.C. § 434(b) and 11 C.F.R. § 106.1.

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Because the NRSC has declined to provide a reasonable allocation method with regard to the unsuccessful solicitation costs, this Office has undertaken to divide the $610,891 involved according to the number of versions of the basic solicitation in which each campaign was cited.

As explained in the General Counsel's Brief, there were twenty-four different versions of the solicitation letter, with the various campaigns appearing in differing numbers of versions. South Dakota appeared in 18, Nevada and Alabama in 12, and Arkansas, California, Colorado, Florida, Georgia, Louisiana, Missouri, North Carolina and Vermont in 6 each for a total of 96 appearances. South Dakota thus accounted for 18.75% of the slots, Nevada and Alabama for 12.5% each and the remaining states for 6.25% each. Application of these percentages to the $610,891 to be allocated produces the following results:

State	Amount
South Dakota	$114,542.06
Alabama	76,361.38
Nevada	76,361.38
Louisiana	38,180.69
North Carolina	38,180.69
Missouri	38,180.69
Florida	38,180.69
Colorado	38,180.69
Georgia	38,180.69
Arkansas	38,180.69
Vermont	38,180.69
California	38,180.69
Total	$610,891.03

Then, again using a chart similar to that at page 19 of the General Counsel's Brief, we arrive at the following figures for excessive contributions pursuant to 2 U.S.C. § 441a(h) resulting

from the NRSC's absorption of solicitation costs:

State	Share of Solicitation Costs	Other Reported NRSC Contributions	Total NRSC Contributions	Amount In Excess
Alabama	$ 76,361.38	$ 16,553	$ 92,914.38	$ 75,414.38
Arkansas	38,180.69	17,662	55,842.69	38,342.69
California	38,180.69	2,496	40,676.69	23,176.69
Colorado	38,180.69	16,806	54,986.69	37,486.69
Florida	38,180.69	16,852	55,032.69	37,532.69
Georgia	38,180.69	16,832	55,012.69	37,512.69
Louisiana	38,180.69	17,197	55,377.69	37,877.69
Missouri	38,180.69	16,615	54,795.69	37,295.69
Nevada	76,361.38	15,666	92,027.38	74,527.38
North Carolina	38,180.69	15,000	53,180.69	35,680.69
South Dakota	114,542.06	16,718	131,260.06	113,760.06
Vermont	38,180.69	16,230	54,410.69	36,910.69
			Total	$585,518.07

C. Non-Earmarked Contributions Plus Solicitation Costs

A combination of the contributions earmarked for the NRSC, but distributed to candidates, and of the costs of the unsuccessful solicitations produces the following:

State	Non-Earmarked Contributions	Share of Solicitation Costs	Other Reported NRSC Contributions	Total NRSC Contributions	Amount In Excess
Alabama	-	$ 76,361.38	$ 16,553	$ 92,914.38	$ 75,414.38
Arkansas	-	38,180.69	17,662	55,842.69	38,342.69
California	$ 2,817.54	38,180.69	2,496	43,494.23	25,994.23
Colorado	-	38,180.69	16,806	54,986.69	37,486.69
Florida	-	38,180.69	16,852	55,032.69	37,532.69
Georgia	-	38,180.69	16,832	55,012.69	37,512.69
Louisiana	-	38,180.69	17,197	55,377.69	37,877.69
Missouri	2.902.92	38,180.69	16,615	57,698.61	40,198.61
Nevada	$ 24,887	76,361.38	15,666	116,914.38	99,414.38
N. Carolina	$ 24,887	38,180.69	15,000	78,067.69	60,567.69
S. Dakota	$ 24,887	114,542.06	16,664	156,093.06	138,593.06
Vermont	$ 27,704.54	38,180.69	16,230	82,115.23	64,615.23
				Total	$693,550.03

D. Coordinated Expenditure Limitations

2 U.S.C. § 441a(d) permits national party committees and state party committees each to spend in connection with the general

election campaign of a candidate for the U.S. Senate the greater of $20,000 or 2 cents times the voting age population of the state involved. This Office has been asked to determine whether the NRSC expended its Section 441a(d) limitations in 1986 with regard to the twelve campaigns benefited by the Direct-To Auto program.

In response to questions posed by this Office, counsel for the respondents has stated that "the NRSC was assigned 100 percent of all 12 states' (including South Dakota's) Section 441a(d) limitations." Thus, the NRSC could spend double the national party's limitation on each of the twelve campaigns here at issue. Counsel then itemized the amounts not utilized with regard to five of those states. (Attachment 1, page 2).

The following chart details the amounts available to the NRSC in 1986, the amounts utilized and remaining pursuant to counsel's response, and the amounts utilized and remaining pursuant to reports filed by the NRSC.

State	Amounts Available	Amounts Utilized Per Response	Amounts Utilized Per Reports	Amounts Remaining Per Response	Amounts Remaining Per Report
Alabama	$ 253,344.96	$ 253,344.96	$ 254,240.96	$ -0-	$ (946.00)
Arkansas	149,442.12	149,442.12	155,010.00	-0-	(5,567.88)
California	1,703,361.00	1,662,083.50	1,700,115.00	41,277.53	3,246.00
Colorado	206,497.08	206,497.08	206,495.08	-0-	2.08
Florida	770,329.70	714,176.31	714,176.00	56,152.89	56,153.00
Georgia	376,702.32	375,927.19	375,912.00	775.13	775.00
Louisiana	272,712.24	272,712.24	272,712.00	-0-	-0-
Missouri	322,942.48	322,962.48	322,528.00	-0-	434.00
Nevada	87,240.00	86,990,94	63,099.00	249.06	24,141.00
N. Carolina	407,061.84	403,521.53	403,521.00	3,540.31	3,540.84
S. Dakota	87,240.00	87,240.00	100.00	-0-	87,140.00
Vermont	87,240.00	87,240.00	87,202.00	-0-	38.00

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The figures above show that this Office and respondents agree that the NRSC has fully expended, or more than expended, its Section 44la(d) limitations as to the campaigns in Alabama, Arkansas, Colorado, Georgia and Louisiana. It is agreed that $56,153 is available to be applied against the NRSC's excessive contributions in the Florida campaign and that $3,540 is similarly available to apply against excessive contributions in the North Carolina race. Small discrepancies exist as to remaining amounts for Missouri and Vermont.

There are larger discrepancies with regard to expenditures for the California, Nevada, and South Dakota campaigns. With regard to California, counsel's response states that $41,277.53 remains to be spent; however, NRSC's reports show a total of $1,700,115 in expenditures leaving only $3,246 to be spent. Thus, reported expenditures far exceed counsel's figures.

More serious are the situations involving Nevada and South Dakota campaigns. Counsel's response states that only $249.06 remains unspent in Nevada of the $87,240 limitation available, while the NRSC's reports show only $63,099 in such expenditures leaving an unspent amount of $24,141. It thus appears that more than $24,000 in Section 44la(d) expenditures were not reported.

Turning to South Dakota, the response from counsel indicates no remaining amount out of the $87,240 limitation available. The NRSC's reports, however, contain only one $100 expenditure against the Section 44la(d) limitation, for a discrepancy of over $87,000. It appears that expenditures totaling $87,000 or more were never reported.

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2 U.S.C. § 434(b)(6)(A)(iv) requires the reporting of the recipients of expenditures made pursuant to 2 U.S.C. § 441a(d) as well as the purpose of the expenditure and the candidate on whose behalf the expenditure is made. By failing to report at least $111,281 in Section 441a(d) expenditures on behalf of the Senatorial campaigns in Nevada and South Dakota in 1986, the NRSC has violated 2 U.S.C. § 434(b).

II. RECOMMENDATIONS

The General Counsel's Brief of January 28, 1988, contained recommendations that the Commission find probable cause to believe that the National Republican Senatorial Committee violated 2 U.S.C. §§ 434(b), 441a(h), 441d(a)(1), and 11 C.F.R. § 110.6(d)(2). The present supplemental brief addresses related and additional violations of 2 U.S.C. § 434(b) and 441a(h); therefore, no additional recommendations are required.

6/24/88
Date

Lawrence M. Noble
General Counsel

Attachments
Responses to questions
Sample solicitation letter

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* P.C. NEW YORK, WASHINGTON, D.C.
CONNECTICUT AND VIRGINIA ONLY

July 1, 1988

HAND DELIVER

Lawrence M. Noble
General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 2282
National Republican Senatorial Committee
Frederick W. Bassinger, as treasurer

Dear Mr. Noble:

As the attorney for the respondents in the above-captioned matter, the undersigned respectfully requests an extension of time of 20 days, to and including July 28, 1988, within which to file a brief in response to the General Counsel's Supplemental Brief.

The grounds for this request are as follows:

1. In order to furnish a meaningful response to the General Counsel's view that there were certain discrepancies in the National Republican Senatorial Committee's ("NRSC") reporting of coordinated expenditures, it will be necessary to review records with the former Finance Director and the former administrator of the NRSC. Both of these persons currently are outside of the District of Columbia, and the records that they would need to see have not yet been retrieved. The additional time requested is absolutely necessary to allow consultation with these persons; and

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2. Counsel's time has been circumscribed by litigation commitments, particularly to the completion of judicially-mandated discovery and the beginning of trial of a complex securities case before the Securities and Exchange Commission (In the Matter of Moyer, et al., No. 3-6985).

We submit that these grounds constitute good cause for the requested extension.

Sincerely,

Stuart M. Gerson

Stuart M. Gerson

SMG:gj

cc: Benjamin Ginsburg, Esquire
Anne A. Weissenborn, Esquire

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RECEIVED
FEDERAL ELECTION COMMISSION
88 JUL -7 PM 3:30

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

SENSITIVE
EXECUTIVE SESSION
JUL 12 1988
Submitted Late

July 7, 1988

MEMORANDUM

TO: The Commission

FROM: Lawrence M. Noble
General Counsel

SUBJECT: MUR 2282 - Memoradum re. Request for Extension of Time

Attached for the Commission's consideration is a memorandum from the Office of the General Counsel concerning a request from counsel for the National Republican Senatorial Committee for an extension of time in which to respond to the General Counsel's Supplemental Brief in MUR 2282. In light of time constraints outlined in the memorandum, this Office asks that the rules regarding the placing of documents on the Commission's agenda be suspended so that this memorandum may be considered by the Commission at its Executive Session of July 12, 1988.

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FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

July 7, 1988

MEMORANDUM

TO: The Commission

FROM: Lawrence M. Noble
General Counsel

SUBJECT: MUR 2282
Request for Extension of Time

On June 24, 1988, this Office hand-delivered to counsel for the National Republican Senatorial Committee and Frederick M. Bassinger, as treasurer, the General Counsel's Supplemental Brief in the above-cited matter which, inter alia, addresses issues raised during the Commission's Executive Session of May 3, 1988. The letter which accompanied the supplemental brief provided for a fifteen day response period, thus setting July 9, 1988, as the latest date for receipt of such response.

On July 1, 1988, this Office received from counsel a request for a twenty-day extension of time which, if granted, would establish July 29, 1988, as the response deadline. (See Attachment 1). In light of Judge Gerhard A. Gesell's order of May 20, 1988, in Common Cause v. F.E.C., which sets an August 1, 1988, deadline for Commission action in this matter, this Office informed counsel that it was not possible to grant the full twenty-day extension. Counsel was offered an extension until July 15, but he stated that it will not be possible for him to provide a complete response by that date.

It was the intention of this Office to deny an extension of time pursuant to its own authority. Given, however, counsel's apparent intention to submit a request for a twenty-day extension directly to the Commission and the time constraints imposed by the court's deadline of August 1 and the fact that no Commission meeting is scheduled for July 19, this Office is asking that the Commission, at its meeting on July 12, deny counsel's original request for a twenty-day extension of time to respond to the General Counsel's Supplemental Brief, grant an extension of time to July 15 for receipt of such a response, and approve the attached letter. 1/

1/ Counsel for respondents has been informed of this Office's intention to recommend Commission action on the original request.

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RECOMMENDATIONS

1. Deny the request of the National Republican Senatorial Committee and Frederick M. Bassinger, as treasurer, for an extension of twenty days to respond to the General Counsel's Supplemental Brief in MUR 2282.

2. Grant an extension of time to July 15, 1988.

3. Approve the attached letter.

Attachments

1. Request for extension of time
2. Letter

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
National Republican Senatorial Committee and Frederick M. Bassinger, as treasurer	)	MUR 2282

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of July 12, 1988, do hereby certify that the Commission decided by a vote of 5-0 to take the following actions in MUR 2282:

1. Deny the request of the National Republican Senatorial Committee and Frederick M. Bassinger, as treasurer, for an extension of twenty days to respond to the General Counsel's Supplemental Brief in MUR 2282.

2. Grant an extension of time to July 15, 1988.

3. Approve the letter attached to the General Counsel's report dated July 7, 1988.

Commissioners Aikens, Elliott, Josefiak, McGarry, and Thomas voted affirmatively for the decision; Commissioner McDonald was not present.

Attest:

7-13-88
Date

Marjorie W. Emmons
Marjorie W. Emmons
Secretary of the Commission

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 15, 1988

Stuart M. Gerson, Esquire
Epstein Becker and Green, P.C.
1140 19th Street, N.W.
Washington, D.C. 20036-66001

RE: MUR 2282
National Republican Senatorial Committee
Frederick M. Bassinger, as treasurer

Dear Mr. Gerson:

This is in response to your letter dated July 1, 1988, requesting an extension of twenty days to respond to the General Counsel's Supplemental Brief in the above-cited matter.

In light of Judge Gerhard A. Gesell's order of May 20, 1988, in Common Cause v. Federal Election Commission, which was cited in our letter to you of May 26, 1988, and which sets an August 1, 1988, deadline for Commission action in this matter, the Commission has denied your full request, but did extend the deadline to July 15, 1988. Accordingly, your response will be due by the close of business on that date.

If you have any questions, please contact Anne A. Weissenborn, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

2042732047

GCC# 9803

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† P.C. NEW YORK, WASHINGTON, D.C.
CONNECTICUT AND VIRGINIA ONLY

July 18, 1988

HAND-DELIVERED

Lawrence M. Noble
General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

88 JUL 18 AM 11:00

Re: MUR 2282
National Republican Senatorial Committee
Frederick W. Bassinger, as treasurer

Dear Mr. Noble:

Enclosed please find the Respondents' Response to General Counsel's Supplemental Brief in the above-captioned matter under review.

Sincerely,

Stuart M. Gerson

Stuart M. Gerson

SMG/dlb

cc: Benjamin Ginsburg, Esquire
Anne A. Weissenborn, Esquire

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88 JUL 18 AM11:00

BEFORE THE
FEDERAL ELECTION COMMISSION

IN THE MATTER OF	X	
NATIONAL REPUBLICAN SENATORIAL COMMITTEE	X	MUR 2282
and	X	
FREDERICK W. BASSINGER, AS TREASURER	X	

RESPONSE TO GENERAL COUNSEL'S SUPPLEMENTAL BRIEF

Introduction

The General Counsel of the Federal Election Commission ("the Commission" or "FEC") had, on January 28, 1988, informed counsel for the respondents that he was prepared to recommend that the Commission find probable cause to believe that respondents hade violated 2 U.S.C. §§ 434(b), 441a(h) and 441d(a), and 11 C.F.R. 110.6(d)(2). This followed the Commission's April 7, 1987 finding that there was reason to believe that these alleged violations had occurred.

Now, through a Supplemental Brief dated June 24, 1988, the General Counsel suggests that additional violations of sections 434(b) and 441a(h). While respondents have, in their previous memoranda, set out their defenses to the General Counsel's charges in considerable detail, the contents of the Supplemental Brief and the circumstances surrounding it, unnecessarily will have resulted in a deprivation of respondents' right adequately to confront the charges against them.

Upon first reading, it was apparent that the General Counsel's Supplemental Brief was based upon a number of patent errors and miscalculations. However, because the individuals most directly involved in the conduct of the 1986-election-cycle program at issue long since have left the employ of the National Republican Senatorial Committee ("NRSC"), it was equally apparent that it would take more than 15 days to prepare a complete and detailed response.

Accordingly, on July 1, 1988, counsel for respondent accepted the suggestion contained in the General Counsel's June 24 letter, and formally requested a 20-day extension. Actually, the General Counsel had misstated the amount of additional time he had the authority to grant (which in fact is 45 days), but the NRSC felt that it could accomplish its task within 20 days, and so asked for no more than that.

While they have yet to receive any formal written response to their counsel's request, respondents were informed telephonically that their request first was deferred to the Commission by the General Counsel, and then was denied. The reason for this denial was purported to relate to litigation to which respondents are not party. Respondents were, however, given an extra week to respond to the Supplemental Brief, but circumstances occurring since that grant only have served to complicate respondents' situation.

In order to maximize the utility of the short additional time granted to them, and to contribute to the Commission's

having accurate information before it, respondent's counsel conferred with staff counsel to demonstrate that certain of the data upon which the Supplemental Brief is based are erroneous. Staff counsel apparently agrees with our corrections.

Accordingly, the General Counsel's submission to the Commission must be revised. But because of the schedule upon which the General Counsel insists, there will not be time for respondents to review and comment upon this revised submission. While staff counsel have been most cooperative in consulting with us, the fact remains that a formalistic position on scheduling has deprived respondents of their right of reply to the matter actually placed before the Commission. This is both unnecessary and unfair.

The instant response is thus far less extensive than respondents would have been able to provide to the Commission had their rights been secured. Nevertheless, there are several points which usefully can be made in the hope that the Commission will choose to terminate this Matter Under Review without a probable cause finding.

A. Distribution of $108,086

This was a matter initially disclosed by the NRSC itself and already has been the subject of some negotiation between counsel. Respondents are unable to comment upon the General Counsel's ultimate conclusion as to these monies because it is not possible to determine the source of the amounts designated "Other Reported NRSC Contributions" in the chart at page 3 of the Supplemental

Brief.

It is stated that these data differ from information previously supplied by the General Counsel, but without knowing what it is that he now relies upon, we cannot reply intelligently to him. Indeed, given the fact that we have found conceded errors in other portions of the data included in the Supplemental Brief, it is reasonable for us not to accept this information on faith.

Accordingly, respondents submit that the General Counsel should be required to detail this information and that they should be given a reasonable period of time to reply.

B. Allocation of Solicitation Costs

Contrary to the General Counsel's view, the NRSC has not declined to provide a reasonable method for the allocation of the costs of solicitation of the Direct-To Auto program. Our position on this is detailed in our earlier memoranda, and without belaboring our point, we invite the Commission's attention to those pleadings.

We do note that respondents' burden should be satisfied by providing a "reasonable" basis for allocation, and they have done so. What the General Counsel is proposing to do is to supply an allocation method that he considers more reasonable. While this exceeds his proper role, he is also quite unreasonable.

11 C.F.R. § 106.1(a), upon which the General Counsel principally relies, provides that costs ought to be allocated among candidates based upon "the benefit reasonably expected to

be derived." That prospective standard would have been of little realistic use to the NRSC in its conduct of solicitations for earmarked contributions which did not involve the participation, approval or input of any individual campaign, and the results of which were highly unpredictable. Under these circumstances, the NRSC's post-hoc allocation was entirely reasonable.

The fact that prospective recipients were clearly identifiable or that their campaigns might have followed an allocation formulation different from the NRSC's had they themselves made the solicitation is irrelevant to the determination of the reasonableness of the method actually chosen by the NRSC. In the context of the NRSC's national party-building role and the broad-based nature of the Direct-To Auto solicitation, it was appropriate for the NRSC to assign the basic solicitation costs to its own vendor expenses and to allocate actual costs to candidates on the basis of contributions actually received on their behalf.

Finally, irrespective of his substantive views, with which we take great issue, the General Counsel's assignment of solicitation costs as "Amount[s] In Excess" of the NRSC's 2 U.S.C. § 441a(h) limitations is irrational. See Supplemental Brief at 9.

First, the amounts listed are tainted by errors appearing elsewhere in the Supplemental Brief. Second, there is no reason why, under any theory, these costs should be counted against direct, rather than coordinated expenditures under 2 U.S.C. §

441a(d).

At the very least, the costs of solicitation were incurred by the NRSC on behalf of the subject candidates. They were not paid directly by any candidate. Thus, even under the General Counsel's unreasonable theory of allocation, solicitation costs were incurred by the NRSC in connection with the election campaigns of Senate candidates and should be viewed in terms of funds remaining available for coordinated expenditures. As we show in the next section of this brief, the General Counsel is in error in his determination of these amounts as well.

C. Coordinated Expenditure Limitations

At page 10 of the Supplemental Brief, the General Counsel sets forth a chart purporting to show, among other things, the coordinated expenditure amounts remaining to the NRSC as to the campaigns involved in this matter. As we explained to staff counsel, we are entirely at a loss to know where many of these interpolations and extrapolations originated. What we do know is that they are often erroneous.

Based upon a review of the NRSC's FEC reports that document the final expenditures (and adjustments for returns, etc.) made on behalf of the various campaigns, and of the NRSC's internal ledgers, the following are the accurate data:

State	Actually Spent	Amount Remaining
Alabama	$253,069.52	$275.44
Arkansas	149,440.58	1.54
California	1,662,083.47	41,277.53

State	Actually Spent	Amount Remaining
Colorado	206,497.08	0
Florida	714,176.31	51,152.89
Georgia	375,927.19	775.13
Louisiana	272,712.24	0
Missouri	321,492.10	1,470.38
Nevada	62,999.94 [1]	249.06
North Carolina	403,521.53	3,540.31
South Dakota	100.00 [2]	87,140.00
Vermont	87,240.00	0

It is clear from the foregoing that there are no discrepancies in the NRSC's reporting of coordinated expenditures. Section D. of the Supplemental Brief therefore should be removed and the data in it which are relied upon elsewhere in the Brief should be altered. Staff counsel apparently now agrees with us about this and will revise the General Counsel's submission to the Commission accordingly.

However, as we have noted, there is insufficient time to allow respondents' counsel the opportunity to review and comment upon this revision. Respondents are entitled to this review and, in the event that this matter is to proceed, the Commission

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[1] Note: $23,991.00 taken back by State party.

[2] $87,140.00, which had been available, was not expended or transmitted to the South Dakota campaign, and so was transferred back into the NRSC's operating account.

should afford it to them.

CONCLUSION

For the reasons stated herein, as well those previously advanced to the Commission, the respondents submit that the Commission should determine that there is no probable cause to believe that the respondents have violated the Act.

Respectfully submitted,

EPSTEIN BECKER & GREEN, P.C.

by: Stuart M. Gerson
STUART M. GERSON

July 18, 1988

Suite 900
1140 19th Street, N.W.
Washington, D.C. 20036
(202) 861-0900

Attorneys for Respondents

FEDERAL ELECTION COMMISSION
88 JUL 20 PM 12:24

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

SENSITIVE
EXECUTIVE SESSION
JUL 26 1988
Submitted Late

July 20, 1988

MEMORANDUM

TO: The Commission

FROM: Lawrence M. Noble
General Counsel

SUBJECT: MUR 2282 - General Counsel's Report

Attached for the Commission's consideration is a report of the Office of the General Counsel recommending Commission determinations of probable cause to believe in the above-cited matter. In light of time constraints imposed by the United States District Court for the District of Columbia, this Office asks that the rules regarding the placing of documents on the Commission's agenda be suspended so that this report may be considered by the Commission at its Executive Session of July 26, 1988.

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
	)	MUR 2282
	)	
National Republican Senatorial Committee	)	
Frederick W. Bassinger as treasurer	)	

GENERAL COUNSEL'S REPORT

On May 3, 1988, the Commission directed the Office of the General Counsel to obtain information related to three specific issues which had arisen during its discussion of MUR 2282. These issues involved (1) the identities of, and amounts received by, the recipients of $108,036 in contributions earmarked for the National Republican Senatorial Committee ("NRSC") but distributed in 1986 by the NRSC as earmarked for candidates; (2) the appropriate allocation to candidates and the reporting of expenditures related to unsuccessful Direct-To Auto solicitations; and (3) the amounts still available to the NRSC pursuant to 2 U.S.C. § 441a(d) for expenditures on behalf of the twelve candidates whose committees benefited from the Direct-To Auto program.

Having received responses to questions covering these three issues, this Office on June 24, 1988, mailed to counsel for the respondents the General Counsel's Supplemental Brief which analyzed the information which had been supplied by counsel and which raised an additional issue involving the reporting of expenditures made pursuant to 2 U.S.C. § 441a(d). The Supplemental Brief incorporated by reference the General

Counsel's Brief in this matter which had been mailed to counsel on January 28, 1988.

On July 12, 1988, the Commission denied respondents' request for an additional twenty days in which to reply to the General Counsel's Supplemental Brief, granting instead an extension until July 15. On July 18 Counsel submitted a Response to the General Counsel's Supplemental Brief.

A. Distribution of $108,086

As discussed in the Supplemental Brief, counsel has stated that the $108,086 in contributions earmarked for the NRSC was distributed among six committees in varying amounts. The respondents do not dispute the recommendations in the Supplemental Brief concerning the NRSC's failure to report these contributions as coming from itself. Counsel does question the source of the figures on page 3 of the Supplemental Brief under the heading "Other Reported NRSC Contributions." These figures in fact represent the sums of all contributions reported to the Commission by the NRSC as having been made in 1985-86 to the twelve campaigns which were also aided by the Direct-To Auto Program.

B. Allocation of Solicitation Costs

Respondents continue to dispute the allocability of the $610,891 in costs related to unsuccessful solicitations. Counsel argues that the respondents have utilized a "reasonable" method of allocation, and that for this Office to supply another method is both outside the General COunsel's "proper role" and "quite

unreasonable." In support of their argument against any allocation to candidates, counsel cites 11 C.F.R. § 106.1(a) with emphasis upon "the benefits reasonably expected to be derived," and then emphasizes the non-involvement of the individual campaigns in the Direct-To Auto Program and the unpredictability of the results of the solicitations. Finally, counsel finds "irrational" the inclusion in the Supplemental Brief of solicitation costs as determined by this Office and the use of those cost figures to reach the amounts by which the NRSC exceeded its $17,500 contribution limitations.

It is apparent that the respondents will admit to no benefit being derived from an unsuccessful solicitation. This Office, as explained in its Supplemental Brief, disagrees. All solicitation programs result in high rates of non-response, yet the costs of the program related to that non-response must be met just as much as those costs related to solicitations which yield contributions. To have another entity pay for unsuccessful solicitations on behalf of a candidate is a benefit to that candidate. Such a benefit is a contribution.1/

1/ In the discussion of the figures included on page 9 of the Supplemental Brief, counsel stated that "the amounts listed are tainted by errors appearing elsewhere in the Supplemental Brief." No explanation is provided as to what errors are being cited. A meeting between staff of this Office and counsel prior to receipt of the response to the Supplemental Brief did reveal certain additions and changes to the respondents' answers to this Office's questions regarding remaining coordinated expenditures limitations; these changes are also included in the response to the Supplemental Brief. The tables on page 9 of the Supplemental Brief do not, however, include adjustments to total excessive contributions as the result of remaining Section 441a(d) expenditure limitations; the headings "Amount in Excess" refer simply to total contributions minus the $17,500 contribution limitation established by 2 U.S.C. § 441a(h).

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C. Coordinated Expenditure Limitations

Attached to the General Counsel's Supplemental Brief was counsel's response to the questions posed by this Office following the Commission's meeting of May 3, including information at #4 concerning unutilized amounts of the NRSC's expenditure limitations pursuant to 2 U.S.C. § 441a(d). The response to the Supplemental Brief received on July 18 contains a number of additions and adjustments to the figures provided in the responses to this Office's questions which were received on June 8.

As is noted in the Supplemental Brief, the NRSC was assigned 100% of all twelve state party committees' expenditure limitations pursuant to Section 441a(d). A comparison of the amounts of Section 441a(d) limitations remaining, as stated by respondents on June 8, with the amounts itemized in the NRSC's reports to the Commission appeared to result in significant discrepancies between amounts reported and amounts now found to be remaining, particularly with regard to the states of Nevada and South Dakota. The amounts reported to the Commission were lower than the figures supplied by counsel by approximately $24,000 for Nevada and $87,000 for South Dakota. The Supplemental Brief therefore raised the issue of an apparent additional violation of 2 U.S.C. § 434(b) as a result of the NRSC's having failed to report all expenditures made pursuant to 2 U.S.C § 441a(d).

In response to the Supplemental Brief counsel has provided additional information showing that the NRSC in fact spent only $62,999.94 of the combined limit for Nevada and returned $23,199

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of the state party committee's limitation to that committee. Therefore, only $249.06 remains of the expenditure limitation for that state. With regard to South Dakota, counsel states that the NRSC utilized only $100 of its combined $87,240 limitation, leaving $87,140 unspent. None of this remainder has been returned to the state party committee.

Given these explanations it appears that the NRSC did not fail to report certain of its coordinated expenditures on behalf of the Senatorial candidates in Nevada and South Dakota; therefore, this Office no longer believes it appropriate to recommend that the Commission find probable cause to believe that a violation of 2 U.S.C. § 434(b) occurred in this respect.

D. Summary of General Counsel's Recommendations

1. Violations of 2 U.S.C. § 434(b) and 11 C.F.R. § 110.6(b)(2)

This Office reiterates its recommendation in the General Counsel's Report dated April 21, 1988, that the Commission find probable cause to believe that in 1986 the National Republican Senatorial Comittee, and Frederick W. Bassinger, as treasurer, violated 2 U.S.C. § 434(b) and 11 C.F.R. § 110.6(b)(2) by failing to report as contributions from itself earmarked contributions, solicited through the Direct-To Auto Program and forwarded to authorized committees, over which it exerted direction or control concerning the choice of recipient campaigns. These contributions earmarked for candidates came to approximately $2,718,823.10. Also included in the approximately $2,826,909.10 in total contributions solicited and forwarded through this program was $108,086 in contributions which had been earmarked

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for the NRSC itself, not for candidates; failure to report these latter contributions as coming from the NRSC rather than as conduited contributions from individuals also provide a basis for a finding of probable cause to believe that the respondents have violated 2 U.S.C. § 434(b).

Added to these violations of 2 U.S.C. § 434(b) should be the respondents' failure to allocate and report as contributions to the candidates benefited $610,891.03 in costs related to unsuccessful Direct-To Auto solicitations.

2. Violations of 2 U.S.C. § 441a(h)

The total NRSC contributions in 1985-86 to the twelve candidate committees benefited by the Direct-To Auto Program were as follows:

State	Directed or Controlled and Non-Earmarked Contributions	Solic. Costs	Reported NRSC Contributions	Total NRSC Contributions
Alabama	$312,568.80	$76,361.38	$16,553	$405,483.18
Arkansas	153,958.22	38,180.69	17,662	209,800.91
California	151,969.25	38,180.69	2,496	192,645.94
Colorado	221,853.00	38,180.69	16,806	277,459.69
Florida	159,692.36	38,180.69	16,852	214,725.05
Georgia	153,051.27	38,180,69	16,832	208,063.96
Louisiana	170,539.65	38,180.69	17,197	225,917.34
Missouri	240,534.99	38,180.69	16,615	295,330.68
Nevada	371,191.43	76,361.38	15,666	463,218.81
N.Carolina	185,242.05	38,180.69	15,000	238,422.74
S.Dakota	514,189.08	114,542.06	16,718	645,449.14
Vermont	192,119.00	38,180.69	16,230	246,529.69

These contributions, reduced by the NRSC's $17,500 contribution limitation per campaign and by that committee's remaining combined coordinated expenditure limitations, total:

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State	Total NRSC Contributions	less	$17,500 Limitation	less	Remaining 441a(d) Expenditure Limitation	=	Total Excess Contributions
Alabama	$405,483.18		$17,500		$ 274.44		$ 387,708.74
Arkansas	209,800.91		17,500		1.54		192,299.37
Calif.	192,645.94		17,500		41,277.53		133,868.41
Colorado	277,459.69		17,500		-0-		259,959.69
Florida	214,725.05		17,500		56,152.89		141,072.16
Georgia	208,063.96		17,500		775.13		189,788.83
Louisiana	225,917.34		17,500		-0-		208,417.34
Missouri	295,330.68		17,500		1,470.38		276,360.30
Nevada	463,218.81		17,500		249.06		445,469.75
N.Carolina	238,422.14		17,500		3,540.31		217,381.83
S. Dakota	645,449.14		17,500		87,140.00		540.809.14
Vermont	246,529.69		17,500		-0-		229,029.69
					TOTAL		$3,222,165.25

Thus, this Office recommends that the Commission find probable cause to believe that the NRSC and Frederick W. Bassinger, as treasurer, violated 2 U.S.C. § 441a(h) by making excessive contributions to twelve authorized committees in 1986 totaling $3,222,165.25.[2/]

2/ As stated in the General Counsel's Supplemental Brief, the combination of only the $108,086 in non-earmarked contributions plus solicitation costs plus reported NRSC contributions results in the following total contributions:

State	Non-Earmarked Contributions	Share of Solicitation Costs	Reported NRSC Contributions	Total NRSC Contributions
Alabama	-	$ 76,361.38	$ 16,553	$ 92,914.38
Arkansas	-	38,180.69	17,662	55,842.69
California	$ 2,817.54	38,180.69	2,496	43,494.23
Florida	-	38,180.69	16,852	55,032.69
Georgia	-	38,180.69	16,832	55,012.69
Louisiana	-	38,180.69	17,197	55,377.69
Missouri	2,902.92	38,180.69	16,615	57,698.61
Nevada	24,887	76,361.38	15,666	116,914.38
N. Carolina	24,887	38,180.69	15,000	78,067.69
S. Dakota	24,887	114,542.06	16,718	156,093.06
Vermont	27,704.54	38,180.69	16,230	82,115.23

(continued on next page)

3. Violation of 2 U.S.C. § 441d(a)(1)

This Office also reiterates the recommendation contained in the General Counsel's Report dated April 21, 1988, that the Commission find probable cause to believe that the National Republican Senatorial Committee and Frederick W. Bassinger, as treasurer, violated 2 U.S.C. § 441d(a)(1) by failing to include a statement on the Direct-To Auto solicitations that those solicitations had been paid for by the authorized committees of the candidates benefited.

RECOMMENDATIONS

1. Find probable cause to believe that the National Republican Senatorial Committee and Frederick W. Bassinger, as treasurer, violated 2 U.S.C. § 434(b) and 11 C.F.R. § 110.6(d)(2) by failing to report as contributions from itself approximately $2,718,813.60 in contributions forwarded in 1986 to twelve authorized committees of candidates for the United States Senate over which the NRSC had exerted direction or control concerning the choice of recipients.

(Footnote 2 continued)
Reductions of these figures by the NRSC's $17,500 contribution limitation per campaign and by the remaining combined expenditure limitations as itemized in counsel's response to the Supplemental Brief leave the following excessive figures:

State	Total NRSC Contributions	less	§ 441a(h) Limitation	less	Remaining § 441a(d) Limitation	=	Total Excessive Contributions
Alabama	$92,914.38		$17,500		$ 274.44		$75,139.94
Arkansas	55,842.69		17,500		1.54		38,341.15
California	43,494.23		17,500		41,277.53		-0-
Colorado	54,986.69		17,500		-0-		37,486.69
Florida	55,032.69		17,500		56,152.89		-0-
Georgia	55,012.69		17,500		775.13		36,737.56
Louisiana	55,377.69		17,500		-0-		37,877.69
Missouri	57,698.61		17,500		1,470.38		38,728.23
Nevada	116,914.38		17,500		249.06		99,165.32
N. Carolina	78,067.69		17,500		3,540.31		57,027.38
S. Dakota	156,093.06		17,500		87,140.00		51,453.06
Vermont	82,115.23		17,500		-0-		64,615.23
					TOTAL		$536,572.25

2. Find probable cause to believe that the National Republican Senatorial Committee and Frederick W. Bassinger, as treasurer, violated 2 U.S.C. § 434(b) by failing to report as contributions from itself $108,086 in contributions earmarked for the NRSC but forwarded to six authorized committees as contributions from individuals.

3. Find probable cause to believe that the National Republican Senatorial Committee and Frederick W. Bassinger, as treasurer, violated 2 U.S.C. § 434(b) by failing to report as contributions to twelve authorized committees $610,891.03 in costs related to unsuccessful solicitations.

4. Find probable cause to believe that the National Republican Senatorial Committee and Frederick W. Bassinger, as treasurer, violated 2 U.S.C. § 441a(h) by exceeding the $17,500 limitation on contributions to twelve authorized committees by a total of $3,222,165.25.

5. Find probable cause to believe that the National Republican Senatorial Committee and Frederick W. Bassinger, as treasurer, violated 2 U.S.C. § 441d(a)(1).

6. Approve the attached conciliation agreement and letter.

7/20/88
Date

Lawrence M. Noble
General Counsel

Attachments
1. Conciliation Agreement
2. Letter

Staff Member: Anne A. Weissenborn

2240732965

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
National Republican Senatorial Committee and Frederick W. Bassinger, as treasurer	)	MUR 2282

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of July 26, 1988, do hereby certify that the Commission took the following actions in MUR 2282:

1. Failed in a vote of 3-3 to pass a motion to find probable cause to believe that the National Republican Senatorial Committee and Frederick W. Bassinger, as treasurer, violated 2 U.S.C. § 434(b) and 11 C.F.R. § 110.6(d)(2) by failing to report as contributions from itself approximately $2,718,813.60 in contributions forwarded in 1986 to twelve authorized committees of candidates for the United States Senate over which the NRSC had exerted direction and control concerning the choice of recipients.

   Commissioners McDonald, McGarry, and Thomas voted affirmatively for the motion; Commissioners Aikens, Elliott, and Josefiak dissented.

(continued)

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2. Decided by a vote of 6-0 to find probable cause to believe that the National Republican Senatorial Committee and Frederick W. Bassinger, as treasurer, violated 2 U.S.C. § 434(b) by failing to report as contributions from itself $108,086 in contributions earmarked for the NRSC but forwarded to six authorized committees as contributions from individuals.

   Commissioners Aikens, Elliott, Josefiak, McDonald, McGarry, and Thomas voted affirmatively for the decision.

3. Decided by a vote of 6-0 to find probable cause to believe that the National Republican Senatorial Committee and Frederick W. Bassinger, as treasurer, violated 2 U.S.C. § 434(b) by failing to report as contributions to twelve authorized committees $608,568 in costs related to unsuccessful solicitations.

   Commissioners Aikens, Elliott, Josefiak, McDonald, McGarry, and Thomas voted affirmatively for the decision.

4. Decided by a vote of 6-0 to find probable cause to believe that the National Republican Senatorial Committee and Frederick W. Bassinger, as treasurer, violated 2 U.S.C. § 441a(h) by exceeding the $17,500 limitation on contributions to twelve authorized committees by a total of $534,249.25.

   Commissioners Aikens, Elliott, Josefiak, McDonald, McGarry, and Thomas voted affirmatively for the decision.

(continued)

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5. Decided by a vote of 6-0 to find probable cause to believe that the National Republican Senatorial Committee and Frederick W. Bassinger, as treasurer, violated 2 U.S.C. § 441d.

   Commissioners Aikens, Elliott, Josefiak, McDonald, McGarry, and Thomas voted affirmatively for the decision.

6. Failed in a vote of 3-3 to pass a motion to approve the conciliation agreement attached to the General Counsel's report dated July 20, 1988,

   Commissioners Aikens, Elliott, and Josefiak voted affirmatively for the decision; Commissioners McDonald, McGarry, and Thomas dissented.

7. Decided by a vote of 5-1 to approve the conciliation agreement attached to the General Counsel's report dated July 20, 1988,

   Commissioners Elliott, Josefiak, McDonald, McGarry, and Thomas voted affirmatively for the decision; Commissioner Aikens dissented.

8. Decided by a vote of 6-0 to direct the General Counsel to send an appropriate letter pursuant to the above-noted actions.

   Commissioners Aikens, Elliott, Josefiak, McDonald, McGarry, and Thomas voted affirmatively for the decision.

Attest:

7-28-88
Date

Marjorie W. Emmons
Marjorie W. Emmons
Secretary of the Commission

2204073269

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 4, 1988

Stuart M. Gerson, Esquire
Epstein Becker and Green, P.C.
1140 19th Street, N.W.
Washington, D.C. 20036-6601

RE: MUR 2282
National Republican
Senatorial Committee
Frederick W. Bassinger,
as treasurer

Dear Mr. Gerson:

On July 26, 1988, the Federal Election Commission found that there is probable cause to believe that the National Republican Senatorial Committee and Frederick W. Bassinger, as treasurer, violated 2 U.S.C. §§ 434(b), 441a(h), and 441d, provisions of the Federal Election Campaign Act of 1971, as amended, in connection with the Committee's 1986 Direct-To Auto program in support of candidates for the United States Senate.

The Commission has a duty to attempt to correct such violations for a period of 30 to 90 days by informal methods of conference, conciliation and persuasion, and by entering into a conciliation agreement with a respondent. If we are unable to reach an agreement during that period, the Commission may institute a civil suit in United States District Court and seek payment of a civil penalty.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If you agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission within 10 days. I will then recommend that the Commission approve the agreement. Please make the check for the civil penalty payable to the Federal Election Commission.

If you have any questions or suggestions for changes in the enclosed conciliation agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Anne A. Weissenborn, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

Enclosure
Conciliation Agreement

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FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

September 20, 1988

Stuart M. Gerson, Esquire
Epstein Becker and Green, P.C.
1140 19th Street, N.W.
Washington, D.C. 20036-6601

RE: MUR 2282
National Republican
Senatorial Committee
Frederick M. Bassinger,
as treasurer

Dear Mr. Gerson:

On August 4, 1988, you were notified that the Federal Election Commission had found probable cause to believe that your clients had violated 2 U.S.C. §§ 434(b), 441a(h), and 441d. On that same date you were sent a conciliation agreement offered by the Commission in settlement of this matter.

Although you have indicated several times that your clients' response to the conciliation agreement would be provided to this Office in the near future, it has not yet arrived. Please note that pursuant to 2 U.S.C. § 437g(a)(4)(A)(i), the conciliation period in this matter may not extend for more than 90 days, but may cease after 30 days. Insofar that more than 30 days have elapsed since your receipt of the Commission's proposed agreement, a recommendation concerning the filing of a civil suit will be made to the Commission by the Office of the General Counsel unless we receive a response within ten working days following your receipt of this letter.

Should you have any questions, please contact Anne A. Weissenborn, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

EXECUTIVE SESSION
NOV 01 1988
SENSITIVE
SUBMITTED LATE

October 27, 1988

MEMORANDUM

TO: The Commission

FROM: Lawrence M. Noble
General Counsel

SUBJECT: MUR 2282 - General Counsel's Report

Attached for the Commission's consideration is a report of the Office of the General Counsel concerning post-probable cause conciliation with the National Republican Senatorial Committee in the above-cited matter and recommending that the Commission authorize the filing of a civil suit. In light of the time constraints imposed by the FECA on post-probable cause conciliation and of the civil action pending in the United States District Court for the District of Columbia involving this matter, this Office asks that the rules regarding the placing of documents on the Commission's agenda be suspended so that this report may be considered by the Commission at its Executive Session of November 1, 1988.

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 2282
National Republican Senatorial Committee	)	
Frederick W. Bassinger as treasurer	)	

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a conciliation agreement which has been signed by counsel for the National Republican Senatorial Committee and Frederick W. Bassinger, as treasurer.

The agreement contains no changes from the agreement approved by the Commission on December 12, 1988. A check for the civil penalty has been received.

II. RECOMMENDATIONS

1. Accept the attached conciliation agreement with the National Republican Senatorial Committee and Frederick W. Bassinger, as treasurer.

2. Close the file.

3. Approve the attached letters.

12/20/88

Lawrence M. Noble
General Counsel

Attachments
1. Conciliation Agreement
2. Photocopy of civil penalty check
3. Letter to Respondent
4. Letter to Complainant

Staff Assigned: Anne A. Weissenborn

2204073274

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

December 29, 1988

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Roger M. Witten, Esquire
Adrienne Masters, Esquire
Wilmer, Cutler and Pickering
2445 M Street, N.W.
Washington, D.C. 20037-1420

RE: MUR 2282
National Republican
Senatorial Committee
Frederick W. Bassinger,
as treasurer

Dear Mr. Witten and Ms. Masters:

This is in reference to the complaint which you filed with the Federal Election Commission on October 28, 1986, on behalf of Common Cause concerning activities in 1986 by the National Republican Senatorial Committee on behalf of candidates for election to the United States Senate.

After conducting an investigation in this matter, the Commission, on July 26, 1988, found there was probable cause to believe that the Respondents had violated 2 U.S.C. §§ 434(b), 441a(h) and 441d(a), provisions of the Federal Election Campaign Act of 1971, as amended. On that same date the Commission failed, by a evenly divided vote, to find probable cause to believe that the Respondents had violated 2 U.S.C. § 434(b) and 11 C.F.R. § 110.6(d)(2) by failing to report as contributions from itself contributions forwarded to twelve authorized committees of candidates for the United States Senate. A Statement of Reasons explaining this latter decision will be forwarded at a later date.

On December 23, 1988, a conciliation agreement signed on behalf of the respondents was accepted by the Commission, thereby concluding the matter. Accordingly the Commission closed the file in this matter on December 23, 1988. A copy of the agreement is enclosed for your information.

If you have any questions, please contact Anne A. Weissenborn, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

Enclosure
Conciliation Agreement

2204073976

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

December 29, 1988

Stuart M. Gerson
Epstein Becker & Green, P.C.
1140 19th Street, N.W
Washington, D.C. 20036-66011

RE: MUR 2282

Dear Mr. Gerson:

On December 23, 1988, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on your clients' behalf in settlement of violations of 2 U.S.C. §§ 434(b), 441a(h) and 441d(a), provisions of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter.

This matter will become a part of the public record within 30 days. If you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel

Please be advised the information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. See 2 U.S.C. § 437g(a)(4)(B). The enclosed conciliation agreement, however, will become a part of the public record.

Enclosed you will find a copy of the fully executed conciliation agreement for your files. If you have any questions, please contact Anne A. Weissenborn, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

Enclosure
Conciliation Agreement

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
National Republican Senatorial Committee and Frederick W. Bassinger, as treasurer	)	MUR 2282

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on December 23, 1988, the Commission decided by a vote of 4-0 to take the following actions in MUR 2282:

1. Accept the conciliation agreement with the National Republican Senatorial Committee and Frederick W. Bassinger, as treasurer, as recommended in the General Counsel's Report signed December 20, 1988.

2. Close the file.

3. Approve the letters, as recommended in the General Counsel's Report signed December 20, 1988.

Commissioners Elliott, Josefiak, McDonald, and Thomas voted affirmatively for the decision. Commissioners Aikens and McGarry did not cast votes.

Attest:

December 23, 1988
Date

Hilda Arnold
for Marjorie W. Emmons
Secretary of the Commission

Received in the Office of Commission Secretary: Tues., 12-20-88, 4:41
Circulated on 48 hour tally basis: Wed., 12-21-88, 11:00
Deadline for vote: Fri., 12-23-88, 11:00

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
National Republican Senatorial Committee	)	MUR 2282
Frederick W. Bassinger, as treasurer	)	
	)	

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CONCILIATION AGREEMENT

This matter was initiated by a signed, sworn, and notarized complaint by Common Cause. An investigation was conducted, and the Federal Election Commission ("the Commission") found probable cause to believe that the National Republican Senatorial Committee ("NRSC") and Frederick W. Bassinger, as treasurer, violated 2 U.S.C. §§ 434(b), 441a(h), and 441d(a).

NOW, THEREFORE, the Commission and the Respondents, having duly entered into conciliation pursuant to 2 U.S.C. § 437g(a)(4)(A)(i), do hereby agree as follows:

I. The Commission has jurisdiction over the Respondents and the subject matter of this proceeding.

II. Respondents have had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondents and the Commission have disagreed on various issues in this matter, but because they are desirous of settling this matter without further dispute, respondents enter voluntarily into this agreement with the Commission.

IV. The pertinent facts in this matter are as follows:

1. Respondent NRSC is a political committee within the meaning of 2 U.S.C. § 431(4).

Attachment 1

2. Respondent Frederick W. Bassinger is the treasurer of the NRSC.

3. 2 U.S.C. § 431(8)(A) defines "contribution" to mean "any gift, . . . loan, advance or deposit of money or anything of value made by any person for the purpose of influencing any election for Federal office."

4. 11 C.F.R. § 100.7(iii)(A) defines "anything of value" to include all in-kind contributions, and states that "the provision of any goods or services without charge . . . is a contribution."

5. 2 U.S.C. & 441a(h) limits to $17,500 the amount which a Senate campaign committee such as the NRSC may contribute to a candidate for the United States Senate in a given election cycle.

6. 2 U.S.C. § 441a(d) permits the national committees of political parties and state political committees each to make expenditures in connection with the general election campaigns of candidates for the United States Senate of the greater of $20,000 or 2 cents times the voting age population of the state involved.

7. 2 U.S.C. § 434(b) requires political committees to report all contributions made to other political committees.

8. 2 U.S.C. § 441a(a)(8) permits persons, including committees, to serve as conduits of contributions earmarked for particular candidates, provided that the conduit or intermediary reports the original source and the intended recipient of such earmarked contributions.

9. 2 U.S.C. § 441d(a)(1) requires that communications soliciting contributions, which are paid for and authorized by a candidate or a candidate's committee, state that they have been paid for by such candidate's committee.

10. 2 U.S.C. § 441d(a)(2) requires that communications soliciting contributions, which are paid for by other persons but authorized by a candidate or a candidate's committee, state that they have been paid for by such other persons and authorized by such candidate or candidate's committee.

11. During 1986 the NRSC, as a national party committee, solicited contributions to twelve campaigns for the United Senate as part of its "Direct-To Auto Program."

12. The NRSC forwarded to the twelve recipient campaigns as earmarked contributions funds received through the Direct-To Auto Program.

13. The NRSC included in the amounts forwarded as earmarked for candidates $108,086 in contributions that had been contributed to the NRSC. This money was distributed as follows:

Candidate	State	Amount
Zschau	California	$ 2,817.54
Bond	Missouri	2,902.92
Santini	Nevada	24,887.00
Broyhill	North Carolina	24,887.00
Abdnor	South Dakota	24,887.00
Snelling	Vermont	27,704.54

During its preparation of a response in this matter, the NRSC identified this error and immediately and voluntarily brought it to the attention of the Commission's staff.

14. The NRSC during 1985 and 1986 made the following direct contributions to the twelve recipient campaigns:

Candidate	State	Amount
Denton	Alabama	$16,553.00
Hutchinson	Arkansas	17,662.00
Zschau	California	2,496.00
Kramer	Colorado	16,806.00
Hawkins	Florida	16,852.00
Mattingly	Georgia	16,832.00
Moore	Louisiana	17,197.00
Bond	Missouri	16,615.00
Santini	Nevada	15,666.00
Broyhill	North Carolina	15,000.00
Abdnor	South Dakota	16,718.00
Snelling	Vermont	16,230.00

15. The total cost to the NRSC of the Direct-To Auto solicitations was $672,000 of which $63,432 was reimbursed by the candidate committees which received the contributions generated or applied against the NRSC's expenditure limitations pursuant to 2 U.S.C. § 44la(d).

16. The NRSC paid the remaining $608,568 in costs related to unsuccessful Direct-To Auto solicitations and did not allocate these costs to the candidates' committees. The NRSC contends that this procedure was based upon its belief that no allocable event had occurred regarding these costs, and that the NRSC itself had derived a benefit from these mailings.

17. Based upon the number of versions of the solicitation letter in which each campaign was cited, the Commission has determined that the $608,568 in costs cited at Section IV, 16, should have been allocated in this particular case among the benefited candidates' committees as follows:

Candidate	State	Amount
Denton	Alabama	$ 76,071.00
Hutchinson	Arkansas	38,035.50
Zschau	California	38,035.50
Kramer	Colorado	38,035.50
Hawkins	Florida	38,035.50
Mattingly	Georgia	38,035.50
Moore	Louisiana	38,035.50
Bond	Missouri	38,035.50
Santini	Nevada	76,071.00
Broyhill	North Carolina	38,035.50
Abdnor	South Dakota	114,106.50
Snelling	Vermont	38,035.50

18. The Commission has determined that if the solicitation costs were properly allocated among the candidates in proportion to the number of mailings in which each was mentioned, then the reportable NRSC contributions to those candidates would be as follows:

State	Non-Earmarked Contributions	Solic. Costs	Reported NRSC Contributions	Total NRSC Contributions
Alabama	-0-	$76,071.00	$16,553	$ 92,624.00
Arkansas	-0-	38,035.50	17,662	55,697.50
California	$ 2,817,54	38,035.50	2,496	43,349.04
Colorado	-0-	38,035.50	16,806	54,841.50
Florida	-0-	38,035.50	16,852	54,887.50
Georgia	-0-	38,035.50	16,832	54,867.50
Louisiana	-0-	38,035.50	17,197	55,232.50
Missouri	2,902.92	38,035.50	16,615	57,553.43
Nevada	24,887.00	76,071.00	15,666	116,624.00
N.Carolina	24,887.00	38,035.50	15,000	77,922.50
S.Dakota	24,887.00	114,106.50	16,718	155,711.50
Vermont	27,704.54	38,035.50	16,230	81,970.04

19. The NRSC was assigned 100% of the state party committee's expenditure limitations pursuant to 2 U.S.C. § 441a(d) for each of the 12 states involved in the Direct-To Auto Program.

20. The amounts of the combined NRSC and state party committee expenditure limitations pursuant to 2 U.S.C.

§ 441a(d) which remain unused and available to the NRSC are as follows:

State	Amount
Alabama	$ 274.44
Arkansas	1.54
California	41,277.53
Colorado	-0-
Florida	56,152.89
Georgia	775.13
Louisiana	-0-
Missouri	1,470.38
Nevada	249.06
North Carolina	3,540.31
South Dakota	87,140.00
Vermont	-0-

21. The Commission has determined, based upon the foregoing fact pattern, that the NRSC exceeded its $17,500 contribution limitations in this case by the following:

State	Total NRSC Contributions	less	§ 441a(h) Limitation	less	Remaining 441a(d) Expenditure Limitation	=	Total Excessive Contributions
Alabama	$ 92,624.00		$17,500		$ 274.44		$ 74,849.56
Arkansas	55,697.50		17,500		1.54		38,195.96
California	43,494.23		17,500		41,277.53		-0-
Colorado	54,841.50		17,500		-0-		37,341.50
Florida	54,887.50		17,500		56,152.89		-0-
Georgia	54,867.50		17,500		775.13		36,592.37
Louisiana	55,232.50		17,500		-0-		37,732.50
Missouri	57,553.42		17,500		1,470.38		38,583.05
Nevada	116,624.00		17,500		249.06		98,874.94
N.Carolina	77,922.50		17,500		3,540.31		56,882.19
S. Dakota	155,711.50		17,500		87,140.00		51,071.50
Vermont	81,970.04		17,500		-0-		64,470.04

22. The solicitation materials used by the NRSC for the Direct-To Auto Program bore on the reply forms the statement that they had been "paid for and authorized by the National Republican Senatorial Committee." The NRSC contends that this language was based upon its understanding

of the terms of its agreement with the various campaigns involved and the nature of its own undertakings.

23. Each of the recipient campaigns signed a "Direct-To Program Agreement" in 1985 or 1986 which generally described the Direct-To Program and explained that recipients would be charged on a "per contributor" basis for the costs of the solicitations. The Commission has determined that, by signing the Direct-To-Program Agreement, each recipient campaign authorized the NRSC solicitations and agreed to pay a share of the costs. The NRSC contends that the Agreements did not envision the review by any campaign of the solicitation materials or activities or the guarantee or expectation of receipt of any specific level of contribution.

V. The NRSC reported contributions in the amount of $108,068, earmarked for itself, as contributions earmarked for candidates in violation of 2 U.S.C. § 434(b).

VI. The NRSC did not allocate to the twelve candidate committees benefited, and report as contributions, any of the $608,568 in costs related to the unsuccessful Direct-To Auto solicitations in violation of 2 U.S.C. § 434(b). The NRSC contends that it did not allocate and report any of these costs based upon its understanding of the agreements that it had entered into with the candidate committees and of the nature of its activities, and its belief that the NRSC derived substantial benefit for itself from these activities.

VII. Based on the foregoing fact pattern, the NRSC exceeded its $17,500 contribution limitation in 1986 with regard to each of

the 12 campaigns benefited by the Direct-To Auto Program by a total of as much as $545,249.25 in violation of 2 U.S.C. § 441a(h).

VIII. The NRSC failed to include on the Direct-To Auto solicitation materials the statement that those communications had been authorized and paid for by the campaigns for which contributions were being sought in violation of 2 U.S.C. § 441d. The NRSC contends that its language was based upon its interpretation of the agreements it had with the various candidate committees, but agrees that, if it undertakes this type of solicitation in the future, it will include in solicitation materials statements appropriately ascribing to the candidates and to itself the sources of authority and payment as to those solicitations.

IX. Respondents will pay a civil penalty to the Federal Election Commission in the amount of Twenty Thousand Dollars ($20,000), pursuant to 2 U.S.C. § 437g(a)(5)(A).

X. 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 motion, 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 for the District of Columbia.

XII. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

XIII. Respondents will have no more than thirty (30) days from the date this agreement becomes effective to comply with and

implement the requirements contained in this agreement and to so notify the Commission.

XIV. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained in this written agreement shall be enforceable.

FOR THE COMMISSION:

Lawrence M. Noble
General Counsel

12/29/88
Date

FOR THE RESPONDENTS:

Stuart M. Gerson
Counsel
by Authority of the National
Republican Senatorial Committee

December 16, 1988
Date

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
National Republican Senatorial Committee	)	MUR 2282
Frederick W. Bassinger as treasurer	)	

Statement of Reasons

COMMISSIONER THOMAS J. JOSEFIAK

On July 26, 1988, the Federal Election Commission approved recommendations of the Office of General Counsel to find probable cause to believe that the National Republican Senatorial Committee and Frederick W. Bassinger, as treasurer, violated: 2 U.S.C. §434(b) by failing to report $108,086 as contributions from itself that had been designated for the NRSC but that it had forwarded to six candidates' authorized committees as contributions from individuals; 2 U.S.C. §434(b) for failing to report $608,568 in fundraising solicitation costs as contributions to twelve candidates' authorized committees; 2 U.S.C. §441a(h) by exceeding the limitation on contributions to twelve authorized committees by a total of $534,249.25; and 2 U.S.C. §441d for failure to provide a complete disclaimer for certain fundraising solicitations that were authorized and paid for, in part, by twelve candidates' authorized committees.

The Commission declined to approve, by a three-to-three vote, the General Counsel's recommendation to find probable cause to believe the named respondents had violated the Act by failing to report, as contributions from the NRSC as well as from individual contributors, $2,718,813.60 in earmarked contributions it had forwarded to twelve candidates' authorized committees. The recommendation was based upon the following provision of the Commission's 'conduit' regulations at

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11 CFR §110.6(d):

> "(1) A conduit or intermediary's contribution limits are not affected by passing on earmarked contributions, except where the conduit exercises any direction or control over the choice of the recipient candidate. (2) If a conduit exercises any direction or control over the choice of the recipient candidate, the contribution shall be considered a contribution by both the original contributor and the conduit, and shall be so reported by the conduit to the Commission ..."

I voted against the recommendation in this matter regarding "direction or control," and opposed the General Counsel's underlying legal analysis. Although the analysis avoids stating the legal issues plainly, I believe that to support that recommendation would have required approval of at least one of the following propositions: 1) whenever earmarked contributions to candidates pass through a conduit's account, such contributions will be deemed to have been 'controlled' by the conduit; 2) whenever a conduit solicits earmarked contributions for specific candidates, such contributions will be deemed to have been 'directed' by the conduit; or 3) whenever the first two circumstances exist together, resulting contributions will be deemed to have been 'directed or controlled' by the conduit.

I cannot support any of these three legal conclusions on the basis of the Act or regulations as presently written and traditionally interpreted. I do not view these propositions to correctly describe the appropriate determinations for finding a conduit to have exercised direction or control over the donor's choice of a recipient candidate. But these points do appear to be the only basis to so find under the facts and circumstances of this case, and are the fundamental arguments, if not directly articulated, of the General Counsel's brief.

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Nor can I support a less direct characterization of the issues at controversy in this matter. Particularly, I reject a purely case-by-case approach that avoids the genuine and difficult legal questions and relies upon the so-called 'totality of the circumstances' argument to determine "direction or control." While the "direction or control" issue does indeed raise questions of fact for the Commission's determination, that inquiry must operate within identifiable standards or thresholds for permissible political activity.

As evidenced by the General Counsel's brief and by the arguments of the Commissioners who approved it, the 'totality' approach substitutes subjective and colloquial meanings for "direction or control" in place of any objectively recognizable legal meaning. That approach abandons all pretense of legal argument and simply deteriorates into moralizing about the propriety of contemporary fundraising methods. From the standpoint of enforcement of (and compliance with) the Federal Election Campaign Act, however, providing anything less than a reasonably clear line in conduit activity is drawing no line at all.

Control: Earmarked contributions passing through a conduit's account.

The General Counsel's brief argued that the NRSC had "control" over the contributors' choice of recipient candidates in these circumstances because the contributions were made payable to the NRSC and deposited into NRSC accounts ("discrete-function accounts" used for transmitting earmarked contributions) before passing the contributions on to the candidates for whom the contributions were earmarked. That argument is flatly inconsistent with the conduit

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regulations in two important respects.

First, the wording of the conduit regulations as to the reporting of earmarked contributions clearly contemplates such contributions either being made payable to and passing through a conduit's account or being made payable to the earmarked candidates' campaigns directly and passed on by the intermediary. The separate and subsequent language regarding "direction or control" seems clearly intended to apply to either approach, and nowhere indicates even an implied distinction regarding "direction or control" between earmarked contribution checks that are 'candidate-payee' or 'conduit-payee.' Section 110.6 provides no suggestion of any automatic rule or presumption as to "direction or control" for those contributions passing through a conduit's account. Actually, true 'earmarking' would always involve contribution checks made payable to a conduit; passing on checks made payable to a candidate is more accurately described by what has become known as 'bundling' of contributor checks by an intermediary (though reportable as conduit activity).

Second, in creating a distinction that is not in the regulations, the Counsel's brief ignores a word that is explicitly and prominently used in §110.6(d). The regulations refer to the exercise of direction or control, not to the opportunity for control that is inherent in every case in which an earmarked contribution is first placed in a conduit's account. It is a ridiculous reading of §110.6 to say a conduit has automatically contravened the "control" standard by depositing in its bank account an earmarked contribution made payable

to it, pursuant to the directions of the regulation itself, because of its potential for exercising control over the money. The General Counsel's brief concludes, however, at pp. 16-17:

> "The NRSC asserts that it was bound by the designations on the contributors' reply forms to forward equal shares of the amounts given to the Senatorial campaigns in the states named, and [with the exception of the $108,086] ... it appears that the NRSC did distribute the funds according to information on the accompanying reply forms. However, the solicitation of checks payable to the NRSC and the use of an NRSC account to transmit the contributions to the ultimate recipients in fact placed the contributions under the actual control of the NRSC, whether or not that control was ever exercised by changing the recipients or the amounts to be distributed to each." (emphasis added)

I find that interpretation and application of §110.6 to be absolutely contrary to the very terms of the regulation.

In passing on the earmarked contributions to candidates according to the distributions designated by the individual contributors in their responses to the solicitation, the NRSC did not exercise control over the donors' choice of recipient candidates. The only way for the Commission to conclude that the NRSC exercised "control" under these facts would be to decide that such control is exercised by a conduit whenever earmarked contributions pass through a conduit's account. Under that rule, contributions earmarked to candidates but made payable to the conduit would be 'per se' attributable to both the donor and the conduit. I cannot, however, support a rule that is so wholly unsupported by a fair reading of the regulation itself.

Direction: Solicitation of contributions for specific candidates.

The General Counsel's argument is far less direct, but no less apparent in its implications, regarding the exercise of "direction."

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The Counsel, as well as Commissioners supporting the recommendation as to "direction or control," appears to acknowledge that a conduit is entitled to solicit earmarked contributions to specific candidates without automatically triggering 'dual attribution' under §110.6 -- that merely recommending or suggesting is not 'directing' (at least for 'candidate-payee' contributions). The brief unconvincingly argues that the nature of the NRSC's solicitations under these facts is particularly 'selective' in recommending candidates. It is impossible to meaningfully distinguish those solicitations, however, from any typical fundraising pitch that recommends a particular candidate or group of candidates and encourages earmarked contributions to them.

a. Method of solicitation.

The General Counsel's argument regarding the NRSC's methods for soliciting earmarked contributions is not based upon any definable legal principle, standard or limit. At pp. 14-16 of its brief, the General Counsel simply presents a series of extra-legal criticisms of the style and implementation of this type of fundraising program. The argument gives no particular weight or relative significance to these features, provides no guidance as to what level or assortment of these fundraising elements would or would not constitute "direction" by a conduit soliciting contributions, and offers no real distinctions between this fundraising program and contemporary, commonplace fundraising generally.

First, the brief states that the solicitations "cited Senatorial campaigns in four states as being virtually without funds," implying

that the solicitations exaggerated the financial need of the campaigns for which earmarked contributions were asked. Such hyperbole as to the urgency of need is, of course, common in solicitations -- the very language of fundraising. Except to the extent the FECA requires that certain information identifying the federal purpose of contributions, the intended recipients and the persons funding the solicitation be clearly presented to potential contributors, the Commission is not empowered to generally regulate truth-in-advertising in the context of fundraising.

Second, the brief observes that the solicitations "requested specific sums." Again, however, a fundamental tenet of effective fundraising is to provide simple and clear choices for potential contributors, including recommending a specific amount for the contribution being requested. That widely used technique may seem overbearing to some, but is not impermissible direction any more than the suggestion of a recipient. Also, the brief notes at p. 3: "The reply form accompanying the letters in each instance cited as possible amounts the sum requested in the letter, a higher amount, or 'other.'"

Third, the brief argues that the NRSC "decided which races were 'closest' and thus which campaigns were most in need of assistance" and "selected certain campaigns as more in need than others." It is always, however, the prerogative of someone requesting contributions for specific candidates to select those to be recommended. Selecting candidates for a solicitation is the inherent choice of the solicitor, as is the criteria for such selection. No reasonable rule can be

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derived from the "direction or control" standard that would permit requesting contributions for specific candidates but would prohibit selecting from among all potential recipients, forbid expressing a suggestion or recommendation as to them, or preclude selection on the basis of 'close races.' This issue most clearly reveals the broader meaning of the General Counsel's argument.

Moreover, it is perfectly natural for a political party committee to identify those 'close' races in which the party's candidates need special help and recommend those candidates to potential contributors. 'Targeting' candidates is a fundamental role of party committees. The Commission has no legal basis for proscribing that normal and benign informational activity, whether in the context of party fundraising mailings or in their communications with PAC directors.

Fourth, the brief argues that "even the twelve campaigns selected were not treated equally," since some campaigns were recommended in more letters than others. This is simply an attentuated version of the prior argument, and an even less convincing effort to distinguish and criticize this particular solicitation program. The requesting entity may select particular candidates on whose behalf earmarked contributions are suggested. During the course of a campaign or a fundraising effort, it can decide to drop a particular candidate from the list of endorsed or suggested candidates, or add more. Having selected candidates to recommend, that requestor may favor or emphasize any from among that group in the frequency of solicitations. The requestor is entitled to request contributions more often for

three of its list of four recommended candidates, just as it is entitled to have had a list of only three in the first place. The frequency of solicitations for particular candidates could affect the allocation of solicitation costs, but varying or 'unequal' emphasis in a direct mail solicitation program would not bear upon "direction or control" over the donors' choice of recipient.

Fifth, the brief suggests that "by carefully matching certain campaigns with certain mailing lists, which in turn dictated the amounts requested, the NRSC channelled monies to the selected campaigns, and more to some of them than others." Besides rehashing the issue of selectivity in recommending candidates, and interjecting terms such as 'dictating' and 'channelling,' this argument appears to add the component of mailing list selection. Rational decision-making in the selection of mailing lists for solicitations on behalf of particular candidates is normal and clearly permissible behavior, however, whether those choices are based upon donors' contribution history, policy preferences or personal characteristics (e.g., occupation). The General Counsel's argument on this point, as on the others, reveals an overwhelming bias against sophisticated fundraising practices currently and widely in use -- as if they somehow 'stack the deck' too much in favor of successful fundraising results. That concern has no legitimate bearing on the legal issue of "direction or control" as long as the donors' choices are deliberate and voluntary.

Sixth, the brief observes that the solicitations did not describe available options for earmarking contributions to other candidates,

nor encourage any variation in the four-way earmarking proposal. As the General Counsel concedes, the solicitations did not expressly or affirmatively mislead potential contributors into thinking the only means or opportunity for making earmarked contributions to candidates was that which was provided by the solicitation. Nor can the NRSC's solicitations, by having described only one requested contribution, be fairly read to even implicitly mislead or constrain potential contributors in any manner beyond the typical request for support for a particular candidate. Offering a range of alternatives is certainly not the usual or favored technique in fundraising appeals, and is not in any way required by the FECA.

These points in the General Counsel's brief reveal an underlying hostility toward the scope and sophistication of the NRSC's program to solicit contributions for targeted candidates. Rather than applying the "direction or control" standard of §110.6 of the regulations, these arguments suggest the NRSC had too much 'direction and control' over its own fundraising effort by virtue of planning, coordination and foreseeably successful results. From that perspective, perhaps, the General Counsel's proposed standard is that conduits who solicit contributions for specific candidates will be deemed to have exercised "direction or control" over the contributions if the solicitation program is too large-scale, carefully designed or effective.

In some specific instances, particularly as to thresholds or permissive exemptions, federal election law imposes restrictions that activity be less than an aggregate dollar amount, or be 'occasional'

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or 'independent' or conducted by 'volunteers.' Generally, however, rights to engage in political activity are not lost or encumbered because one's actions are too well-organized, deliberate, professional or 'slick.' There is no legitimate governmental interest in limiting the political activity at issue here to the spontaneous, amateurish, ineffective or unsuccessful, and no reasonable manner for doing so. Large-scale fundraising operations may inherently bring certain legal consequences or raise potential problems, particularly as to payment or allocation of solicitation costs, but such efforts are not inherently contrary to the letter or spirit of the law by virtue of the scale on which they are conducted. Federal election law contemplates participants in the competitive game of politics will play strenuously under -- and to the fullest extent permitted by -- reasonably and fairly drawn rules. The General Counsel provides no rules for the conduct of solicitations here, except a vague warning that common fundraising techniques and approaches can combine to be 'too much' for the contributor to resist.

b. Contributor choice.

At p. 3, the General Counsel's brief observes that the reply form "listed the same four states as were named in the letter, and contained the statement, 'to make sure our candidates have the funds they need, I'm enclosing the most generous contribution I can to be split among them.'" From the facts presented, the General Counsel reaches the following conclusion as to 'earmarking' at p. 10-11:

> "... it would be difficult to argue that the contributors were not informed of the proposed destinations of their contributions,

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> given the language of both the letter and the reply form. Rather, if the contributors had read both of these documents, they would have known that their contributions would be divided as stated therein. There is no evidence that the NRSC forwarded the contributions designated for Senatorial campaigns in any way other than that which was explained in the solicitations."

It is precisely the specificity of the solicitations, and the presumptive knowledge of the contributors as to the 'destination' and 'division' of their earmarked contributions, that most clearly should preclude finding that the NRSC exercised "direction or control over the choice of the recipient." The NRSC did not solicit contributions to be allocated among an unspecified group of 'targeted' candidates, nor seek or receive any discretionary authority in choosing recipients or allocating amounts as between them. Donors' direction and control over the choice of recipient was not compromised or diminished but, rather, secured by having been given a specific recommendation.

Nevertheless, the brief addresses the 'exercise of any direction or control over the choice of the recipient' on p. 16 and asserts:

> "The NRSC selected the recipient campaigns, determined goals for the amounts to be transmitted to the various recipients, and suggested to the solicitees specific amounts to contribute. The persons solicited for contributions could, to be sure, choose to give or not to give, but once they chose to give, their contributions were made on terms established by the NRSC from which few if any contributors deviated. The only apparent choice was to give to the campaigns in all four states listed or not to give at all."

Whether to give or not to give according to the solicitation is, of course, the only "apparent choice" in most all solicitations. In this instance, over 90% of those receiving these NRSC solicitations chose <u>not</u> to give, and a significant number of those who responded chose to not earmark for candidates but to give to the NRSC.

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Nowhere does the General Counsel's brief argue, nor does any evidence before the Commission indicate, that the contributors who chose to participate in response to these solicitations made anything but a deliberate, voluntary and contemporaneous choice to earmark their contributions as recommended. See: Advisory Opinion 1980-46. Nowhere is it argued that the contributors' choice to give or not to give, or to give according to the recommended earmarking, was surrendered to or coopted by the NRSC. The decision to make a contribution and to earmark it for the four candidates was made exclusively by the contributor at the moment the contributor chose to sign the reply card and send in his or her check. The choice of recipient and amount was fully determined at that time; no power to direct or control preceded that action, and no discretion resided with the NRSC following it.

Ironically, it is the very specificity of the solicitation that the General Counsel finds most offensive and legally significant. According to the brief at p. 11, "the individual contributors merely ratified the designation or earmarking set out in the NRSC's letters and reply forms." The General Counsel's argument essentially alleges "coercion" or "undue influence" at this point, engrafting upon the "direction or control" standard of §110.6 some 'consumer protection.' It would determine an adverse legal consequence for fundraising solicitations based upon the Commission's value judgment that the sales pitch is too focused, too targeted or too 'hard sell,' or that responding according to the earmarking recommendation was made too easy and attractive, or that prospective contributors in the lists

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selected were too likely to acquiesce in the recommendation. That approach suggests that solicitees are helpless idiots who need the "direction" standard to protect them from cleverly designed solicitations they cannot resist.

Certainly, alleged 'coercion' in soliciting contributions would be a relevant factor under the "direction or control" standard of §110.6 under some factual circumstances. In the context of employers asking for contributions from employees or shop stewards seeking contributions from union members, for example, where a job or livelihood may be jeopardized by a refusal to comply, and the contact between solicitor and solicitee may be direct and personal, the potential clearly exists for earmarked contributions to have been 'directed or controlled' by means of coercion, harassment or undue pressure. The opportunity for candidate-specific solicitations to move beyond mere recommendation, endorsement or suggestion and to constitute direction will depend upon the nature of the relationship between the soliciting entity and the contributors solicited.

But surely a party committee's direct mail solicitations to lists containing thousands of potential contributors fit at the end of the spectrum where the least opportunity for coercive effects or undue pressure may be fairly or reasonably imputed. Despite the General Counsel's references to 'selecting,' 'matching,' 'dictating' or 'channelling,' whatever pressure was arguably applied to these contributors by these mass mailings could not be less personal, direct or focused. The General Counsel appears troubled that a number of the

NRSC's contributors seemed so willing to respond according to the solicitations' recommendations, and concludes that their will power was unfairly tested.

No legitimate argument can be made that the NRSC's solicitation program constituted coercive 'direction' over the contributors without condemning all direct mail solicitations to falling under the standard. The General Counsel's analysis attempts to be based upon the facts of this case, but its reasoning represents a broad policy prohibition for which any and all conduit solicitations for earmarked contributions to specific candidates would be indistinguishable -- except, perhaps, those the Commission could subjectively determine were sufficiently neutral and unpersuasive.

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Direction or control: Combinations and totality of circumstances.

After having presented the arguments regarding the nature of the NRSC's fundraising solicitations and its role as 'conduit-payee' for passing on the donors' earmarked contributions, the General Counsel's brief finally concludes, at p. 17, that it is the "combination of solicitation methods and direct involvement in the flow of funds between the contributors and the recipient committees" that distinguishes these circumstances from Commission precedent and determines that the "direction or control" threshold of §110.6 was crossed. The argument suggests that these two elements in tandem created impermissible "direction or control," regardless of their independent legal significance.

It is conceivable in legal interpretation, though unlikely, that two otherwise permissible actions become impermissible when undertaken together. In those circumstances, however, one action must have some significant bearing, effect or impact upon the other. The actions must be shown to be somehow dependent upon each other, so that the practical result and legal consequences of one or both is changed by the presence of the other.

No such practical or legal interdependency can be demonstrated under the facts of this case. Acting as a conduit did not make the NRSC's solicitation methods any more or less 'direction over the choice of the recipient,' and soliciting contributions for specific candidates did not make the act of passing on the earmarked contributions any more or less 'control.' The permissible conduit activity and the permissible solicitation activity have no significant bearing upon each other. Each activity is allowed under the FECA without triggering a finding of "direction or control"; together, they add up to two allowable activities. The General Counsel's approach simply found both practices subjectively objectionable and particularly offensive when combined in the same fundraising program.

Similarly, the generalized 'totality of the circumstances' theory has been misapplied here to justify an intuitive judgment and avoid a definable legal conclusion. It is certainly true that the Commission has the capacity and responsibility to review the entire range of facts presented by an enforcement matter, and to conclude that particular behavior 'crosses the line' and constitutes a violation of

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the FECA. But we should do so based upon some recognizable standards, limits or thresholds regarding political activity or speech. We must attempt to point to a specific activity, a particular type of conduct or the very language of a communication, or identify as precisely as possible what there is about a combination of actions or words -- the totality of the circumstances -- that results in adverse legal consequences. That is the essence not only of fair and reasonable enforcement, but of promoting, or even making possible, compliance with the law.

In this matter, "direction or control over the choice of the recipient candidate" could have been found in a combination of factual elements if the cumulative or combined effect was that contributors had been denied, or had declined, a voluntary, deliberate and specific choice as to which candidates would receive specific amounts of their earmarked contributions, and the conduit had exercised some decision-making over the actual making of the contribution independently of the contributors. The Commission would still be obligated to identify which of NRSC's actions, or combination of actions, caused that legal result.

In my opinion, the circumstances of this case do not indicate any legally relevant facts that would distinguish the NRSC's solicitation and conduit activity from that activity fully allowed and contemplated by the Act, nor from similar activity widely conducted by others actively engaged in the political process. And no such line-drawing was provided by the General Counsel's arguments in support of its

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recommendation to find a reporting violation by the NRSC pursuant to the "direction or control" standard of §110.6. Instead, the Counsel's brief offered only a narrative composed of disapproving, pejorative language criticizing the style and scope of the NRSC's fundraising methods, coupled with unsupportable legal interpretation regarding earmarked contributions passing through a conduit's account, to reach a value judgment as to the over-powering influence of these requests upon potential contributors.

Adoption of the General Counsel's approach would provide no fair warning or guidance to those soliciting or transmitting earmarked contributions, and simply cast a vague and menacing pall over this type of fundraising. It would only discourage permissible activity, of which the Commission might subjectively disapprove or consider altogether 'too much,' rather than prevent activity that is recognizably impermissible.

Under the facts of this case, and as presented by the General Counsel, I could not vote to find probable cause to believe the NRSC had exercised direction or control over the choice of recipient candidates by those donating earmarked contributions in response to NRSC solicitations without adopting broad 'per se' rules regarding conduit solicitations of earmarked contributions, or earmarked contributions passing through a conduit's account, or a combination of the two circumstances. If the Commission is to impose adverse legal consequences upon such activity, then we ought to define and proscribe such behavior by redrafting our regulations. In interpreting the Act

and regulations as currently written, however, I could not vote for the recommendation.

1/30/89

Thomas J. Josefiak
Commissioner

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

CLOSED

MEMORANDUM

TO: COMMISSIONERS
EX-OFFICIOS
STAFF DIRECTOR
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/JOSHUA MCFADDEN

DATE: FEBRUARY 27, 1989

SUBJECT: STATEMENT OF REASONS FOR MUR 2282

Attached is a copy of Commissioners Aikens' and Elliott's signed Statement of Reasons in MUR 2282 received in the Commission Secretary's Office on Friday, February 24, 1989.

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BEFORE THE FEDERAL ELECTION COMMISSION

In the matter of	)	
	)	
National Republican	)	**MUR 2282**
Senatorial Committee	)	
Frederick W. Bassinger	)	
as treasurer	)	

CONCURRENCE

Commissioner Joan D. Aikens
Commissioner Lee Ann Elliott

We fully concur with the rationale and legal analysis presented by Commissioner Josefiak in his Statement of Reasons in MUR 2282.

We specifically agree with Commissioner Josefiak's reasoning why there was no probable cause to believe the respondents exercised any direction or control over the contributions in this case.

Joan D. Aikens
Commissioner

Lee Ann Elliott
Commissioner

February 24, 1989

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FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

THE FOLLOWING MATERIAL IS BEING ADDED TO THE PUBLIC FILE OF CLOSED MUR 2282.

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BEFORE THE FEDERAL ELECTION COMMISSION

In the matter of	)	
	)	
National Republican Senatorial Committee	)	MUR 2282
Frederick W. Bassinger as treasurer	)	
	)	

CONCURRENCE

Commissioner Joan D. Aikens
Commissioner Lee Ann Elliott

We fully concur with the rationale and legal analysis presented by Commissioner Josefiak in his Statement of Reasons in MUR 2282.

We specifically agree with Commissioner Josefiak's reasoning why there was no probable cause to believe the respondents exercised any direction or control over the contributions in this case.

Joan D. Aikens
Commissioner

Lee Ann Elliott
Commissioner

February 24, 1989

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SEPARATOR

FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

THE FOLLOWING MATERIAL IS BEING ADDED TO THE PUBLIC FILE OF CLOSED MUR 2282.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

June 21, 1989

MEMORANDUM

TO: THE COMMISSION

FROM: MARJORIE W. EMMONS
COMMISSION SECRETARY

MWE

SUBJECT: STATEMENT OF REASONS - MUR 2282

Transmitted herewith is a copy of the Statement of Reasons for MUR 2282 signed by Chairman McDonald, Commissioner McGarry, and Commissioner Thomas.

This was received in the Secretariat on June 21, 1989.

Attachment as noted

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Applying the statute, legislative history, and Commission regulations to the facts of this case, we conclude that the $2.3 million given to the twelve Republican senatorial candidates by the NRSC were contributions to those candidates from the NRSC. Accordingly, we agree with the General Counsel's recommendation to find probable cause to believe that the NRSC violated 2 U.S.C. §441a(h) by exceeding the limitations on contributions to senate candidates and 2 U.S.C. §434(b) and 11 C.F.R. §110.6(d)(2) by failing to report as contributions the monies it had given.

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I.

The Federal Election Campaign Act of 1971, as amended ("the Act"), limits the contributions and expenditures that may be made by party committees to or on behalf of candidates for federal office. 2 U.S.C. §441a. Section 441a(h) authorizes the "Republican or Democratic Senatorial Campaign Committee, or the national committee of a political party, or any combination of such committees" to contribute "not more than $17,500" to a senatorial candidate. The NRSC, which is a political committee organized specifically to support Republican candidates in elections for the United States Senate, is subject to the §441a(h) contribution limitation.

The Act also allows the national and state committees of the political parties to make so-called "coordinated expenditures" in connection with the general election campaigns of the parties' candidates, but such expenditures may not exceed certain dollar

In order to ensure that the contribution limitations are not evaded or circumvented, Congress enacted a number of provisions designed to prevent the indirect funneling of contributions to specific candidates. Of particular significance to this case, the statute attributes as contributions to a candidate not only those payments made to a candidate's authorized committee, §441a(a)(7)(A), but also those payments "earmarked" through an intermediary or conduit for a particular candidate, §441a(a)(8).3/ An intermediary or conduit is required to report the original source and intended recipient of the contributions to the Commission. See 11 C.F.R. 110.6(c). Moreover, an intermediary or conduit must forward earmarked contributions for an authorized candidate committee no later than 10 days after receipt. 11 C.F.R. §102.8(c).

The general rule with regard to the receipt of earmarked contributions by a conduit is that "a conduit or intermediary's contribution limits are not affected by passing on earmarked contributions, except where the conduit exercises any direction or control over the choice of the recipient candidate." 11 C.F.R. §110.6(d)(1) (emphasis added). When a conduit exercises such direction or control, "the contribution shall be considered a contribution by both the original contributor and the conduit,

3/ 2 U.S.C. §441a(a)(8) provides, in pertinent part:
For purposes of the limitations imposed by this section, all contributions made by a person, either directly or indirectly, on behalf of a particular candidate, including contributions which are in any way earmarked or otherwise directed through an intermediary or conduit to such candidate, shall be treated as contributions from such person to such candidate.

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In response to the NRSC solicitation, over 43,000 individuals sent in a total of $2,340,664 in earmarked contributions. The 43,000 checks received by the NRSC were made payable to either the NRSC or the Republican Presidential Task Force or the Republican Inner Circle. All contributions received by the NRSC were deposited by the NRSC into an NRSC controlled bank account. Disbursements to the various candidates were made by the NRSC through wire transfers or checks from the NRSC account bearing the heading "National Republican Senatorial Committee." The total cost to the NRSC of the solicitation was $672,000 of which $63,432 was reimbursed by the candidate committees which received the contributions generated or applied against the NRSC's §441a(d) expenditure limitations. The NRSC paid the remaining $608,568 in costs related to the unsuccessful solicitations and did not allocate these costs to the candidate committees.

On October 28, 1986, Common Cause filed a complaint with the Federal Election Commission alleging that the National Republican Senatorial Committee had made contributions to Republican Senate candidates in excess of the §441a(h) limitations. The complaint described the September 2, 1986, NRSC solicitation and the subsequent transmission of contributions to candidates by the NRSC. The complaint stated that the contributions which the NRSC reported as earmarked by the contributors were not, in fact, earmarked by them. The complaint further stated that even if these contributions were viewed as earmarked, the NRSC exercised

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contributions forwarded in 1986 to the authorized committees of twelve Senate candidates. The General Counsel found that the NRSC had exercised direction or control over the selection of the recipient candidates to be benefited by its fundraising activity, thereby becoming a contributor of the earmarked funds solicited and forwarded to the campaigns.

A motion to adopt the General Counsel's recommendation regarding direction or control by the NRSC failed to secure the four affirmative votes necessary to make a probable cause to believe determination. 5/ 2 U.S.C. §437g(a)(4). Three Commissioners supported the General Counsel's recommendation and three Commissioners opposed the recommendation.

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5/ By a vote of 6-0, the Commission agreed with the General Counsel's recommendation to find probable cause to believe that the NRSC violated (1) §434(b) by failing to report as contributions from itself $108,086 in contributions earmarked for the NRSC but forwarded to six committees as contributions from individuals; (2) §434(b) by failing to report as in-kind contributions to twelve authorized committees $608,568 in solicitation costs; and (3) §441d by failing to include a proper disclaimer on its solicitation.

The General Counsel also recommended that the Commission find probable cause to believe that the NRSC had violated §441a(h) by $3,222,165. This figure included the $2.3 million in contributions over which the NRSC had exercised direction or control. The Commission did not vote on this recommendation, however, since it had already split 3-3 on whether the $2.3 million should be viewed as a contribution for reporting purposes from the NRSC to the twelve candidate committees. Removing the direction or control amount and other NRSC monies sent to the twelve candidate committees during the same time period, the Commission found probable cause to believe that the NRSC exceeded the contribution limitations of §441a(h) by $534,249. This figure represented previously unallocated solicitation costs, the non-earmarked contributions and reported NRSC contributions less the §441a(h) and remaining §441a(d) limitations.

On December 23, 1988, the Commission accepted a conciliation agreement signed by the NRSC in settlement of the violation of 2 U.S.C. §§434(b), 441a(h) and 441d(a). In the conciliation agreement, the NRSC admitted that they had violated the provisions of the Act and agreed to pay a civil penalty of $20,000.

A.

The "direction or control" provision contained in 11 C.F.R. §110.6(d)(2) expressly reflects congressional concern that the contribution limitations not be circumvented in any way:

> It is the understanding of the committee that the following rule will apply with respect to the application of the contribution limitations established by subsection (b): if a person exercises any direct or indirect control over the making of a contribution, then such contribution shall count toward the limitation imposed with respect to such person under subsection (b), but it will not count toward such a person's contribution limitation when it is demonstrated that such person exercised no direct or indirect control over the making of the contribution involved.

H.R. Rep. No. 1239, 93d Cong., 2d Sess. 16 (1974)(emphasis added). In deciding whether a person has exercised "any direct or indirect control," the Commission has applied a "totality of the circumstances" test and looked to several factors. Specifically, the Commission has focused on the degree to which the conduit influences the making and transmittal of the contribution, including choosing the recipient candidate, deciding on the total amount to be forwarded, establishing suggested contribution levels and affecting the timing of the contribution.

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and control over the making of such earmarked contributions as well as act as the conduit and intermediary for them." (emphasis added.) 7/

In reaching its conclusion, the Commission expressly noted that the facts of Advisory Opinion 1986-4 were "materially indistinguishable" from an opinion it had issued some 10 years earlier. In Advisory Opinion Request 1976-92, an organization proposed a solicitation plan whereby it would make a decision as to which candidates it wished to support and the amount of the contribution. 1 Fed. Elec. Camp. Fin. Guide (CCH), ¶ 6951. If a candidate were recommended for support, a program administrator would solicit contributions from individuals selected by the administrator on the basis of potential interest in a particular candidate. The contributors would make their checks payable to the candidate's committee but the administrator would collect the

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7/ In spite of the General Counsel's contrary recommendation, three Commissioners decided that the NRSC exercised no direction or control. One Commissioner, who filed a Statement of Reasons for his vote, has emphatically rejected the use of a "totality of the circumstances" test:

> As evidenced...by the arguments of the Commissioners who approved it, the 'totality' approach substitutes subjective and colloquial meanings for "direction or control" in place of any objectively recognizable legal meaning. That approach abandons all pretense of legal argument and simply deteriorates into moralizing about the propriety of contemporary fundraising methods.

Josefiak Statement of Reasons at 3 (emphasis added.) We note, however, that the author of the above statement did join the unanimous opinion of the Commission and voted for the use of the totality of the circumstances approach in Advisory Opinion 1986-4.

candidates. This activity, painstakingly choreographed by the NRSC so that the resulting contributions to particular candidates were all but preordained, is the very epitome of direction or control.

At the outset, it is important to recognize that the NRSC's September 2, 1986 mailing was not a general fundraising letter. Rather, the NRSC had selected and prioritized specific candidates whom it intended to support. In the mailing, the NRSC solicited contributions for twelve Senate campaigns with a particular emphasis on what the NRSC believed to be close Senate races in South Dakota, Nevada and Alabama.

Having decided that it wished to support specific candidates, the NRSC sought to "match-up" particular contributors from its "donor base" with particular candidates. MUR 2282, NRSC December 15, 1986 Response, Affidavit of NRSC Comptroller Preztunik at ¶3. To this end, the NRSC sent out 24 different versions of the September 2, 1986 letter. Half of those targeted for contributions were previous contributors to the NRSC or an NRSC sponsored program. The NRSC has stated that "[i]n connection with its own fundraising...the NRSC has developed a large group of reliable supporters." MUR 2282, NRSC December 15, 1986 Response at 4. The NRSC concedes that particular Senate races were "matched-up" with these "reliable" contributors: "[T]he state groups were determined on the basis of the NRSC's belief that potential contributors would most likely be inclined to assist the candidates with earmarked contributions in the races

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checks payable to only one or two of the candidates alluded to in the solicitation, or to candidates not mentioned in the solicitation, or even to the NRSC itself. If the recipient of the NRSC solicitation wished to contribute there was but one choice -- write a check that would be automatically divided among four candidates selected by the NRSC.

Not only were would-be contributors limited in their choice of candidate, but they were also limited in deciding the amount of the contribution to a candidate. Without exception, a contribution to the NRSC account was equally split between the four candidates alluded to in the solicitation. Nor did the NRSC indicate that any distribution other than a four way split was possible. Instead, the NRSC simply announced what would automatically be done with a contribution that was remitted in response to the solicitation. By insisting that contributors had to give specific amounts which were automatically split between four candidates, the NRSC, not the contributor, effectively controlled how much a candidate would receive from a contribution.

As the final element of NRSC's fundraising scheme, contributor checks were made payable to the NRSC -- not the candidate -- and deposited in an NRSC account before they were funneled by the NRSC to the candidates. The contributor was directed to use the NRSC as the only means for delivery of a contribution to a candidate. It is beyond dispute that money

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choice to the single option of sending an earmarked contribution on behalf of a specific candidate. Such a distinction must be part of the "direction or control" analysis as demonstrated by MUR 1028 where solicitees were given the additional option of making an unearmarked contribution to Council for a Livable World. In contrast, the NRSC's communications clearly confined the solicitees' option to making an earmarked contribution on behalf of specified candidates only. This provided an element of direction or control over the solicitees' choice not evident in AO 1980-46 and MUR 1028.

A second distinction is that in AO 1980-46 and MUR 1028 there was no apparent suggestion as to the amount to be contributed. The NRSC's plea for a specified amount confined the solicitees' choice. Indeed, the contributors were not advised that they could give to only certain of the listed campaigns or give more to one campaign than the other. The amount contributed would be automatically apportioned in equal amounts among the four specified races.

Finally, in AO 1980-46 and MUR 1028 the contributions collected were not in the form of checks payable to and deposited in the conduit's own bank account. Here the checks were made payable to the NRSC and deposited in its accounts. 8/ Even though the NRSC had some obligation to forward these earmarked

8/ This distinction alone undermines the NRSC's reliance on Advisory Opinion 1980-46. The Act specifically states that an advisory opinion can only be relied on by another person if the "specific transaction or activity [is] indistinguishable in all its material aspects...." 2 U.S.C. §437f(c)(1)(B).

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individual had a clear opportunity to decide against making a contribution. Indeed, if respondents' narrow reading of AO 1980-46 were adopted, it is difficult to imagine a set of circumstances under which direction or control could be found since all solicitations, by definition, provide the solicited individual an opportunity to decline the solicitation.

In our opinion, the General Counsel properly considered the totality of the circumstances in this matter. In deciding whether the NRSC exercised direction or control over the making of earmarked contributions, the General Counsel made the following finding:

> [T]he NRSC directed the attention of particular groups of potential contributors to particular races, urged the contribution of specific amounts to reach specified goals, and acquired control over the contributions received by having the checks made payable to itself and by depositing those checks into its own account.

MUR 2282, General Counsel's Probable Cause Brief at 17. We concur with these findings and agree with the General Counsel's conclusion that "this combination of solicitation methods and direct involvement in the flow of funds between the contributors and the recipient committees...clearly constituted 'direction or control.'" Id.

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Through §441a(d) and §441a(h), Congress provided generous allowances for party activity in Senate election races. Yet, Congress did not intend that party expenditures and contributions be open-ended and without limits. Not only do the very terms of these provisions expressly limit expenditures and contributions by party committees, see n.2 and p.2, supra, but the legislative history clearly underscores that intent.

In passing §441a(d), Congress sought to "allow the parties to play a strong role in the electoral process, while at the same time assuring that limitations are placed on their activities." H.R. Rep. No. 93-1239, 93d Cong., 2d Sess. 157 (1974)(supplemental views of Rep. Frenzel). Congressional recognition of the need to place some limitations on party activity is clear from the 1974 FECA legislative history. At one point, the Senate passed an amendment proposed by Senator Brock that would have exempted congressional campaign committees such as the NRSC from the Act's expenditure limits. 120 Cong. Rec. S5189 - S5191 (daily ed. April 3, 1974). The Senate reversed itself, however, five days later. 120 Cong. Rec. S5411 - S5415 (daily ed. April 8, 1974). Successfully urging repeal of the Brock Amendment, Senator Clark noted the "loophole" created by the Brock Amendment and stated, "To permit unlimited expenditures would be a serious mistake." 120 Cong. Rec. S5413, S5414 (daily ed. April 8, 1974)(remarks of Senator Clark).

Similarly, calls for increased party activity were balanced with a recognition that limitations on such activity were needed

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IV.

Consistent with the Commission's prior rulings in this area, we agree with the Commission's General Counsel that the NRSC exercised "direction or control" over the making of $2.3 million dollars in earmarked contributions. Accordingly, we agree with the General Counsel's recommendations to find probable cause to believe that the NRSC violated 2 U.S.C. §434(b) and 11 C.F.R. §110.6(d)(2) by failing to report as contributions from itself approximately $2.3 million in contributions forwarded in 1986 to the authorized committees of twelve Senate candidates.

6-2-89
Date

Danny Lee McDonald
Chairman

6/2/89
Date

John Warren McGarry
Commissioner

6/2/89
Date

Scott E. Thomas
Commissioner

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

T06-06-89

THE FOLLOWING MATERIAL IS BEING ADDED TO THE

PUBLIC RECORD IN (CLOSED) MUR 2282

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
	)	
National Republican Senatorial Committee	)	**MUR 2282**
Frederick W. Bassinger as treasurer	)	

STATEMENT OF REASONS

Chairman Danny L. McDonald
Commissioner John Warren McGarry
Commissioner Scott E. Thomas

In Matter Under Review ("MUR") 2282, the Federal Election Commission and its General Counsel examined a massive candidate support effort initiated, planned, and carried out by the National Republican Senatorial Committee ("NRSC"). A single large-scale, NRSC solicitation raised over $2.3 million dollars in checks made out either to the NRSC or an NRSC sponsored project. No candidate names were mentioned on the checks. After the NRSC deposited these checks into an NRSC bank account, the NRSC gave $2.3 million dollars to twelve Republican senatorial candidates.

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Applying the statute, legislative history, and Commission regulations to the facts of this case, we conclude that the $2.3 million given to the twelve Republican senatorial candidates by the NRSC were contributions to those candidates from the NRSC. Accordingly, we agree with the General Counsel's recommendation to find probable cause to believe that the NRSC violated 2 U.S.C. §441a(h) by exceeding the limitations on contributions to senate candidates and 2 U.S.C. §434(b) and 11 C.F.R. §110.6(d)(2) by failing to report as contributions the monies it had given.

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I.

The Federal Election Campaign Act of 1971, as amended ("the Act"), limits the contributions and expenditures that may be made by party committees to or on behalf of candidates for federal office. 2 U.S.C. §441a. Section 441a(h) authorizes the "Republican or Democratic Senatorial Campaign Committee, or the national committee of a political party, or any combination of such committees" to contribute "not more than $17,500" to a senatorial candidate. The NRSC, which is a political committee organized specifically to support Republican candidates in elections for the United States Senate, is subject to the §441a(h) contribution limitation.

The Act also allows the national and state committees of the political parties to make so-called "coordinated expenditures" in connection with the general election campaigns of the parties' candidates, but such expenditures may not exceed certain dollar

limitations. 2 U.S.C. §441a(d).1/ Because the NRSC is not considered a "national" or "state" committee of a political party for §441a(d) purposes, it is not authorized by §441a(d) to make expenditures on behalf of candidates for election to the Senate. The national and state party committees may authorize the NRSC, however, to expend their respective §441a(d) allowance on their behalf. See FEC v. Democratic Senatorial Campaign Committee, 454 U.S. 27 (1981) ("FEC v. DSCC").2/

1/ Specifically, §441a(d) provides in pertinent part:

> (3) The national committee of a political party, or a State committee of a political party, including any subordinate committee of a State committee, may not make any expenditure in connection with the general election campaign of a candidate for Federal office in a State who is affiliated with such party which exceeds--
> (A) in the case of a candidate for election to the office of Senator, or of Representative from a State which is entitled to only one Representative, the greater of--
> (i) 2 cents multiplied by the voting age population of the State (as certified under subsection (e) of this section); or
> (ii) $20,000;

2/ The §441a(d) expenditure allowance is considerably larger than the allowable contribution limit for a Senate race. For the 1988 elections, even in the least populated States, the State party and national party were each entitled to spend $46,100 under §441a(d) for their Senate nominee. With the coordinated expenditure and contribution limit provisions, Congress struck a reasonable balance between the need to encourage party activity and the need to prevent parties from becoming a vehicle for evading the limits on contributions to candidates. Without the limits on party spending, a person could easily effect support on behalf of particular candidates in excess of the limits of 2 U.S.C. §441a(a)(1)(A) or (2)(A) by contributing not only to the candidate but also to party committees likely to spend on behalf of such candidates. Limits on party spending effectuate the underlying contribution limits of the Act by reducing the opportunity to assure additional candidate support through the parties.

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In order to ensure that the contribution limitations are not evaded or circumvented, Congress enacted a number of provisions designed to prevent the indirect funneling of contributions to specific candidates. Of particular significance to this case, the statute attributes as contributions to a candidate not only those payments made to a candidate's authorized committee, §441a(a)(7)(A), but also those payments "earmarked" through an intermediary or conduit for a particular candidate, §441a(a)(8).3/ An intermediary or conduit is required to report the original source and intended recipient of the contributions to the Commission. See 11 C.F.R. 110.6(c). Moreover, an intermediary or conduit must forward earmarked contributions for an authorized candidate committee no later than 10 days after receipt. 11 C.F.R. §102.8(c).

The general rule with regard to the receipt of earmarked contributions by a conduit is that "a conduit or intermediary's contribution limits are not affected by passing on earmarked contributions, except where the conduit exercises any direction or control over the choice of the recipient candidate." 11 C.F.R. §110.6(d)(1) (emphasis added). When a conduit exercises such direction or control, "the contribution shall be considered a contribution by both the original contributor and the conduit,

3/ 2 U.S.C. §441a(a)(8) provides, in pertinent part:
For purposes of the limitations imposed by this section, all contributions made by a person, either directly or indirectly, on behalf of a particular candidate, including contributions which are in any way earmarked or otherwise directed through an intermediary or conduit to such candidate, shall be treated as contributions from such person to such candidate.

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and shall be so reported by the conduit to the Commission." 11 C.F.R. §110.6(d)(2).

II.

In September of 1986, the NRSC sent a solicitation letter signed by Vice President George Bush to 565,239 individuals across the country. Each version 4/ of the letter began by stating the concern of President Reagan and Vice President Bush that "a shift of just 4 seats will give control of the Senate back to the Democrats." (emphasis in the original). The letter stated that Republican senatorial candidates in four named states were "on the verge of running out of money," cited a specific total ($236,500 each) without which they would lose, and requested a specific amount from the solicitees which was to be divided equally among the four unnamed candidates chosen by NRSC. There was no opportunity for the contributor to designate any other candidate.

Each letter was accompanied by a reply form which listed the figure mentioned in the letter, a higher amount, or "other" as possible contribution amounts. The reply form listed the same four states as were named in the letter and contained the statement, "to make sure our candidates have the funds they need, I'm enclosing the most generous contribution I can to be split equally among them."

4/ Twelve campaigns were cited in the twenty-four different versions of the letter sent out, although some appeared more often than others. For example, South Dakota appeared in eighteen versions, Nevada and Alabama in twelve and the rest in six each.

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In response to the NRSC solicitation, over 43,000 individuals sent in a total of $2,340,664 in earmarked contributions. The 43,000 checks received by the NRSC were made payable to either the NRSC or the Republican Presidential Task Force or the Republican Inner Circle. All contributions received by the NRSC were deposited by the NRSC into an NRSC controlled bank account. Disbursements to the various candidates were made by the NRSC through wire transfers or checks from the NRSC account bearing the heading "National Republican Senatorial Committee." The total cost to the NRSC of the solicitation was $672,000 of which $63,432 was reimbursed by the candidate committees which received the contributions generated or applied against the NRSC's §441a(d) expenditure limitations. The NRSC paid the remaining $608,568 in costs related to the unsuccessful solicitations and did not allocate these costs to the candidate committees.

On October 28, 1986, Common Cause filed a complaint with the Federal Election Commission alleging that the National Republican Senatorial Committee had made contributions to Republican Senate candidates in excess of the §441a(h) limitations. The complaint described the September 2, 1986, NRSC solicitation and the subsequent transmission of contributions to candidates by the NRSC. The complaint stated that the contributions which the NRSC reported as earmarked by the contributors were not, in fact, earmarked by them. The complaint further stated that even if these contributions were viewed as earmarked, the NRSC exercised

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direction and control over the choice of the recipient candidates.

The Office of General Counsel prepared a report for Commission consideration that contained a factual and legal analysis of the allegations presented in the Common Cause complaint. On April 7, 1987, the Commission unanimously agreed with the General Counsel's recommendations and found reason to believe that the NRSC and Richard G. Nelson, as treasurer, had violated 2 U.S.C. §441a(h) by exceeding the NRSC's contribution limitation. The Commission also found reason to believe that respondents had violated 2 U.S.C. §434(b) and 11 C.F.R. §110.6(d)(2) by failing to report contributions to candidates for the Senate over which, as a conduit, the NRSC had exercised direction or control. The Commission further found reason to believe that the NRSC had violated 2 U.S.C. §441d(a) by failing to use a complete or proper disclaimer on certain solicitations.

After a comprehensive investigation and review of the numerous responses and materials submitted by the NRSC, the Office of General Counsel prepared a report for Commission consideration analyzing the pertinent factual and legal issues. Among its findings, the General Counsel recommended that the Commission find probable cause to believe that the NRSC violated 2 U.S.C. §434(b) and 11 C.F.R. §110.6(d)(2) by failing to report as contributions from itself approximately $2,718,813.60 (this amount included the $2.3 million received from the September, 1986 solicitation and forwarded to the candidates) in

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contributions forwarded in 1986 to the authorized committees of twelve Senate candidates. The General Counsel found that the NRSC had exercised direction or control over the selection of the recipient candidates to be benefited by its fundraising activity, thereby becoming a contributor of the earmarked funds solicited and forwarded to the campaigns.

A motion to adopt the General Counsel's recommendation regarding direction or control by the NRSC failed to secure the four affirmative votes necessary to make a probable cause to believe determination. 5/ 2 U.S.C. §437g(a)(4). Three Commissioners supported the General Counsel's recommendation and three Commissioners opposed the recommendation.

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5/ By a vote of 6-0, the Commission agreed with the General Counsel's recommendation to find probable cause to believe that the NRSC violated (1) §434(b) by failing to report as contributions from itself $108,086 in contributions earmarked for the NRSC but forwarded to six committees as contributions from individuals; (2) §434(b) by failing to report as in-kind contributions to twelve authorized committees $608,568 in solicitation costs; and (3) §441d by failing to include a proper disclaimer on its solicitation.

The General Counsel also recommended that the Commission find probable cause to believe that the NRSC had violated §441a(h) by $3,222,165. This figure included the $2.3 million in contributions over which the NRSC had exercised direction or control. The Commission did not vote on this recommendation, however, since it had already split 3-3 on whether the $2.3 million should be viewed as a contribution for reporting purposes from the NRSC to the twelve candidate committees. Removing the direction or control amount and other NRSC monies sent to the twelve candidate committees during the same time period, the Commission found probable cause to believe that the NRSC exceeded the contribution limitations of §441a(h) by $534,249. This figure represented previously unallocated solicitation costs, the non-earmarked contributions and reported NRSC contributions less the §441a(h) and remaining §441a(d) limitations.

On December 23, 1988, the Commission accepted a conciliation agreement signed by the NRSC in settlement of the violation of 2 U.S.C. §§434(b), 441a(h) and 441d(a). In the conciliation agreement, the NRSC admitted that they had violated the provisions of the Act and agreed to pay a civil penalty of $20,000.

III.

This case is about the circumvention of the contribution limitations. In the 1986 elections, the NRSC targeted twelve Senate races for victory in order to retain majority control of the United States Senate. To achieve this end, the NRSC virtually exhausted the statutorily available means of candidate support for each of these twelve candidates. The NRSC made full use of the §441a(d) expenditure allowance assigned to it by the twelve state parties as well as the $17,500 per candidate contribution provision of §441a(h). This, however, was not enough. In order to augment the applicable contribution limits under the Act and funnel more money to its candidates, the NRSC devised the fundraising scheme which is at issue in this case.

We agree with the Commission's General Counsel that the NRSC exercised "direction or control" when it raised and funneled an additional $2.3 million to the twelve Republican senatorial candidates. We believe that this result is consistent with previous matters in which the Commission has set out the analysis for determining whether a conduit or intermediary has exercised direction or control. Moreover, this result effectuates the legislative intent that political committees may not use intermediary or conduit status as a vehicle for widescale circumvention of the contribution limitations.

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A.

The "direction or control" provision contained in 11 C.F.R. §110.6(d)(2) expressly reflects congressional concern that the contribution limitations not be circumvented in any way:

> It is the understanding of the committee that the following rule will apply with respect to the application of the contribution limitations established by subsection (b): if a person exercises any direct or indirect control over the making of a contribution, then such contribution shall count toward the limitation imposed with respect to such person under subsection (b), but it will not count toward such a person's contribution limitation when it is demonstrated that such person exercised no direct or indirect control over the making of the contribution involved.

H.R. Rep. No. 1239, 93d Cong., 2d Sess. 16 (1974)(emphasis added). In deciding whether a person has exercised "any direct or indirect control," the Commission has applied a "totality of the circumstances" test and looked to several factors. Specifically, the Commission has focused on the degree to which the conduit influences the making and transmittal of the contribution, including choosing the recipient candidate, deciding on the total amount to be forwarded, establishing suggested contribution levels and affecting the timing of the contribution.

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In Advisory Opinion 1986-4, 1 Fed. Elec. Camp. Fin. Guide (CCH), ¶ 5846, issued six months before the NRSC sent out its September 2, 1986 mailing,6/ the Commission applied the totality of the circumstances test to proposed fundraising activity by Armstrong World Industries, Inc. ("Armstrong"). Responding to solicitations for contributions from federal candidates, Armstrong planned to determine whether a contribution should be made and, where appropriate, the total amount of the contribution. Once it decided to provide a candidate with contributions, Armstrong proposed to solicit those contributions from likely contributors it had "matched-up" with specific candidates. Armstrong planned to collect these contribution checks, made payable to the candidate's committee, and then send these checks to Armstrong's Washington office which, in turn would deliver the bundled checks to the candidate's committee. In a unanimous opinion, the Commission concluded that "Armstrong will, in the totality of these circumstances, exercise direction

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6/ Any doubts which an organization might have about its rights and obligations under the Act may be cleared up by obtaining a binding advisory opinion from the Commission. The courts have long viewed the Commission's advisory opinion process as a "prompt means of resolving doubts with respect to the statute's reach." Martin Tractor Co. v. FEC, 627 F.2d 375, 384 (D.C. Cir. 1980), cert. denied, 449 U.S. 954 (1980)(emphasis added). On a number of occasions, the NRSC has successfully utilized the advisory opinion process. See, e.g., Advisory Opinions 1978-25, 1978-64, 1980-119 and 1983-8 reported respectively at 1 Fed. Elec. Camp. Guide (CCH), ¶¶ 5315 and 5320, 5347, 5561 and 5713.

The NRSC, however, chose not to ask for an advisory opinion on its proposed fundraising activity at issue in MUR 2282 despite the serious problems suggested with that course by Advisory Opinion 1986-4.

and control over the making of such earmarked contributions as well as act as the conduit and intermediary for them." (emphasis added.) 7/

In reaching its conclusion, the Commission expressly noted that the facts of Advisory Opinion 1986-4 were "materially indistinguishable" from an opinion it had issued some 10 years earlier. In Advisory Opinion Request 1976-92, an organization proposed a solicitation plan whereby it would make a decision as to which candidates it wished to support and the amount of the contribution. 1 Fed. Elec. Camp. Fin. Guide (CCH), ¶ 6951. If a candidate were recommended for support, a program administrator would solicit contributions from individuals selected by the administrator on the basis of potential interest in a particular candidate. The contributors would make their checks payable to the candidate's committee but the administrator would collect the

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7/ In spite of the General Counsel's contrary recommendation, three Commissioners decided that the NRSC exercised no direction or control. One Commissioner, who filed a Statement of Reasons for his vote, has emphatically rejected the use of a "totality of the circumstances" test:

> As evidenced...by the arguments of the Commissioners who approved it, the 'totality' approach substitutes subjective and colloquial meanings for "direction or control" in place of any objectively recognizable legal meaning. That approach abandons all pretense of legal argument and simply deteriorates into moralizing about the propriety of contemporary fundraising methods.

Josefiak Statement of Reasons at 3 (emphasis added.) We note, however, that the author of the above statement did join the unanimous opinion of the Commission and voted for the use of the totality of the circumstances approach in Advisory Opinion 1986-4.

checks and forward them to the candidate. As in Advisory Opinion 1986-4, the Commission concluded that the earmarked contributions would be viewed as contributions from both the individuals who made the original contribution as well as the conduit committee.

By contrast, in Advisory Opinion 1981-57, 1 Fed. Elec. Camp. Fin. Guide (CCH), ¶ 5636, the Commission held permissible a plan whereby union members could authorize payroll deduction amounts to be forwarded to the separate segregated fund and then on to candidates specified by them. Unlike MUR 2282 and Advisory Opinion 1986-4 and Re: Advisory Opinion Request 1976-92, the facts in Advisory Opinion 1981-57 showed that there was no direction or control since members would be advised that "they may earmark their contributions to any candidate or political committee." (emphasis added.) Further, in obtaining payroll deduction agreements, the separate segregated fund "would not limit [contributors] to a particular candidate or group of candidates."

B.

In MUR 2282, the NRSC selected specific candidates whom it intended to help, "matched-up" particular would-be contributors with those particular candidates, confined the contributor's choice of recipients to those particular candidates, suggested the amount to be given by the particular contributor, arranged for the checks to be made payable to the NRSC, deposited the funds in an NRSC account, and then forwarded such funds to the

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candidates. This activity, painstakingly choreographed by the NRSC so that the resulting contributions to particular candidates were all but preordained, is the very epitome of direction or control.

At the outset, it is important to recognize that the NRSC's September 2, 1986 mailing was not a general fundraising letter. Rather, the NRSC had selected and prioritized specific candidates whom it intended to support. In the mailing, the NRSC solicited contributions for twelve Senate campaigns with a particular emphasis on what the NRSC believed to be close Senate races in South Dakota, Nevada and Alabama.

Having decided that it wished to support specific candidates, the NRSC sought to "match-up" particular contributors from its "donor base" with particular candidates. MUR 2282, NRSC December 15, 1986 Response, Affidavit of NRSC Comptroller Preztunik at ¶3. To this end, the NRSC sent out 24 different versions of the September 2, 1986 letter. Half of those targeted for contributions were previous contributors to the NRSC or an NRSC sponsored program. The NRSC has stated that "[i]n connection with its own fundraising...the NRSC has developed a large group of reliable supporters." MUR 2282, NRSC December 15, 1986 Response at 4. The NRSC concedes that particular Senate races were "matched-up" with these "reliable" contributors: "[T]he state groups were determined on the basis of the NRSC's belief that potential contributors would most likely be inclined to assist the candidates with earmarked contributions in the races

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that were the closest." MUR 2282, NRSC June 1, 1987 Response reprinted in General Counsel's Probable Cause Brief, Attachment 1, page 10. Indeed, the General Counsel's investigation revealed that the solicitation was so specific that even "the amount of the joint contribution requested of each potential contributor varied from version to version according to the mailing list used, the list in turn reflecting either the prior contribution history of the prospective contributors or the fact that the persons being contacted were prospects, not earlier contributors." MUR 2282, General Counsel's Probable Cause Brief at 3.

Once the NRSC had matched up a particular contributor to a particular group of candidates, it confined the choice of the contributors to those candidates. In Advisory Opinion 1981-57, no direction or control was found where the solicitation was not limited to a particular candidate or group of candidates and would-be contributors were advised that they may earmark their contributions to any candidate or group of candidates. These contributor opportunities, however, are not present in this case. Rather, as in Advisory Opinion 1986-4 where direction or control was found, an individual solicited by the NRSC could contribute only to the particular candidates to whom he was directed by the NRSC. The reply form did not provide contributors with a means to designate their contributions for other candidates. The NRSC did not want to give any suggestion to the recipients of its mailings that they would have the flexibility to make their

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checks payable to only one or two of the candidates alluded to in the solicitation, or to candidates not mentioned in the solicitation, or even to the NRSC itself. If the recipient of the NRSC solicitation wished to contribute there was but one choice -- write a check that would be automatically divided among four candidates selected by the NRSC.

Not only were would-be contributors limited in their choice of candidate, but they were also limited in deciding the amount of the contribution to a candidate. Without exception, a contribution to the NRSC account was equally split between the four candidates alluded to in the solicitation. Nor did the NRSC indicate that any distribution other than a four way split was possible. Instead, the NRSC simply announced what would automatically be done with a contribution that was remitted in response to the solicitation. By insisting that contributors had to give specific amounts which were automatically split between four candidates, the NRSC, not the contributor, effectively controlled how much a candidate would receive from a contribution.

As the final element of NRSC's fundraising scheme, contributor checks were made payable to the NRSC -- not the candidate -- and deposited in an NRSC account before they were funneled by the NRSC to the candidates. The contributor was directed to use the NRSC as the only means for delivery of a contribution to a candidate. It is beyond dispute that money

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deposited in a bank account set up by the NRSC was under the NRSC's control.

The NRSC asserts that its conduit program was similar to solicitation programs at issue in Advisory Opinion 1980-46 and MUR 1028 where the Commission found no "direction or control." In Advisory Opinion 1980-46, 1 Fed. Elec. Camp. Fin. Guide (CCH), ¶5508, the Commission held that a plan, whereby the National Conservative Political Action Committee ("NCPAC") suggested contributions to a specified candidate and fowarded contributor checks, did not require attribution of amounts forwarded to NCPAC's contribution limit. And in MUR 1028, the Commission found that there was no statutory violation in a plan whereby the Council for a Livable World sent mailings suggesting that a contribution be sent to a particular candidate. No contribution amount was suggested, and contributions to candidates were to be in the form of checks made payable to the recipient candidate's committee.

These cases are readily distinguishable from the present matter. First, there was no indication in the NCPAC request of whether the "suggestion" to contribute to a particular candidate was presented as the only option or as one of several options (for example, sending a contribution directly to the candidate, sending an unearmarked contribution to NCPAC, or sending an earmarked contribution to NCPAC). Without the specific text of NCPAC's proposal before it, the Commission could not presume it was dealing with a communication clearly limiting the solicitee's

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choice to the single option of sending an earmarked contribution on behalf of a specific candidate. Such a distinction must be part of the "direction or control" analysis as demonstrated by MUR 1028 where solicitees were given the additional option of making an unearmarked contribution to Council for a Livable World. In contrast, the NRSC's communications clearly confined the solicitees' option to making an earmarked contribution on behalf of specified candidates only. This provided an element of direction or control over the solicitees' choice not evident in AO 1980-46 and MUR 1028.

A second distinction is that in AO 1980-46 and MUR 1028 there was no apparent suggestion as to the amount to be contributed. The NRSC's plea for a specified amount confined the solicitees' choice. Indeed, the contributors were not advised that they could give to only certain of the listed campaigns or give more to one campaign than the other. The amount contributed would be automatically apportioned in equal amounts among the four specified races.

Finally, in AO 1980-46 and MUR 1028 the contributions collected were not in the form of checks payable to and deposited in the conduit's own bank account. Here the checks were made payable to the NRSC and deposited in its accounts. 8/ Even though the NRSC had some obligation to forward these earmarked

8/ This distinction alone undermines the NRSC's reliance on Advisory Opinion 1980-46. The Act specifically states that an advisory opinion can only be relied on by another person if the "specific transaction or activity [is] indistinguishable in all its material aspects...." 2 U.S.C. §437f(c)(1)(B).

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contributions within a certain time, see 2 U.S.C. §432(b)(2), as a practical matter it could control the time of forwarding within those parameters and had use of the funds until it did forward them.

To the extent respondents suggest that under Advisory Opinion 1980-46 no direction or control exists so long as the solicited individual has an opportunity to decide against making a contribution, 9/ this legal conclusion is inconsistent with previous and subsequent Commission advisory opinions and furthermore, we are hard-pressed to find any subsequent advisory opinion which stands for this remarkable proposition. In an early Advisory Opinion Request, 1976-92, supra, the Commission found "direction or control" present in a solicitation plan even though the solicited individual had a clear opportunity to decide against making a contribution. Likewise in a later advisory opinion, AO 1986-4, supra, the Commission found "direction or control" present in a solicitation plan even though the solicited

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9/ Unfortunately, the Commission's analysis in Advisory Opinion 1980-46 was less than complete. The question of direction or control was only one of several issues discussed in AO 1980-46 and was, in fact, overshadowed by the question of whether NCPAC's proposed activity constituted independent expenditures. See Dissenting Views of Commissioner Friedersdorf and Dissenting Opinion of Commissioner Aikens.

individual had a clear opportunity to decide against making a contribution. Indeed, if respondents' narrow reading of AO 1980-46 were adopted, it is difficult to imagine a set of circumstances under which direction or control could be found since all solicitations, by definition, provide the solicited individual an opportunity to decline the solicitation.

In our opinion, the General Counsel properly considered the totality of the circumstances in this matter. In deciding whether the NRSC exercised direction or control over the making of earmarked contributions, the General Counsel made the following finding:

> [T]he NRSC directed the attention of particular groups of potential contributors to particular races, urged the contribution of specific amounts to reach specified goals, and acquired control over the contributions received by having the checks made payable to itself and by depositing those checks into its own account.

MUR 2282, General Counsel's Probable Cause Brief at 17. We concur with these findings and agree with the General Counsel's conclusion that "this combination of solicitation methods and direct involvement in the flow of funds between the contributors and the recipient committees...clearly constituted 'direction or control.'" Id.

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C.

At issue in MUR 2282 is the NRSC funding of Republican Senate candidates in twelve states. Each of these twelve states as well as the national party authorized the NRSC to make §441a(d) expenditures on their behalf. As a result of these authorizations, NRSC spent $4.5 million of the $4.7 million it was allowed to spend on behalf of these twelve Republican candidates.

In addition, the NRSC was allowed to contribute up to $17,500 to each of the twelve Republican candidates pursuant to §441a(h). This represented an additional $210,000 which could be spent on the twelve Senate races. As with its §441a(d) limits, the NRSC virtually exhausted its §441a(h) limit when it contributed nearly $185,000 of the $210,000 available directly to the twelve candidates.

Beyond the §441a(d) and §441a(h) activity, the NRSC spent an additional $3 million on these twelve Republican Senate candidates. The figures indicate that the NRSC spent $600,000 to raise over $2.3 million in earmarked contributions for these candidates. In addition, there was over $100,000 that was earmarked for the NRSC but distributed by the NRSC to six of the Senate candidates.

Viewed in this context, it is easy to understand why MUR 2282 concerns the integrity of the contribution limitations.

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Through §441a(d) and §441a(h), Congress provided generous allowances for party activity in Senate election races. Yet, Congress did not intend that party expenditures and contributions be open-ended and without limits. Not only do the very terms of these provisions expressly limit expenditures and contributions by party committees, see n.2 and p.2, supra, but the legislative history clearly underscores that intent.

In passing §441a(d), Congress sought to "allow the parties to play a strong role in the electoral process, while at the same time assuring that limitations are placed on their activities." H.R. Rep. No. 93-1239, 93d Cong., 2d Sess. 157 (1974)(supplemental views of Rep. Frenzel). Congressional recognition of the need to place some limitations on party activity is clear from the 1974 FECA legislative history. At one point, the Senate passed an amendment proposed by Senator Brock that would have exempted congressional campaign committees such as the NRSC from the Act's expenditure limits. 120 Cong. Rec. S5189 - S5191 (daily ed. April 3, 1974). The Senate reversed itself, however, five days later. 120 Cong. Rec. S5411 - S5415 (daily ed. April 8, 1974). Successfully urging repeal of the Brock Amendment, Senator Clark noted the "loophole" created by the Brock Amendment and stated, "To permit unlimited expenditures would be a serious mistake." 120 Cong. Rec. S5413, S5414 (daily ed. April 8, 1974)(remarks of Senator Clark).

Similarly, calls for increased party activity were balanced with a recognition that limitations on such activity were needed

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during the passage of §441a(h) in 1976. As originally proposed by Senator Johnston, the provision would have increased to $20,000 the amounts which the Democratic or Republican Senatorial Campaign Committee could contribute to senatorial candidates. Prior to the Johnston Amendment, the senatorial committees were limited to $5,000 per election or a total of $10,000 for both the primary and general elections. Despite criticism that the amendment "carved out" an unnecessary exception for party committees and would "open up the flood gates" of increased election spending, the amendment passed the Senate. See 122 Cong. Rec. S3807-3808 (daily ed. March 18, 1976)(remarks of Senator Clark). At conference, however, the $20,000 figure was trimmed back to the $17,500 figure currently found in §441a(h). H.R. Rep. No. 94-1057, 94th Cong., 2d Sess. 59 (1976).

Applying this legislative history to the facts of this case, we think Congress did not intend to allow NRSC to supplement its §441a(d) and §441a(h) limits by orchestrating approximately $2.3 million in earmarked contributions. We believe that through a series of complex and sophisticated fundraising techniques, the NRSC sought to do indirectly what it could not do directly -- provide a specified amount of contributions for particular candidates. Such fundraising activity plainly circumvents the contribution limitations carefully prescribed by Congress.

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IV.

Consistent with the Commission's prior rulings in this area, we agree with the Commission's General Counsel that the NRSC exercised "direction or control" over the making of $2.3 million dollars in earmarked contributions. Accordingly, we agree with the General Counsel's recommendations to find probable cause to believe that the NRSC violated 2 U.S.C. §434(b) and 11 C.F.R. §110.6(d)(2) by failing to report as contributions from itself approximately $2.3 million in contributions forwarded in 1986 to the authorized committees of twelve Senate candidates.

6-2-89
Date

Danny Lee McDonald
Chairman

6/2/89
Date

John Warren McGarry
Commissioner

6/2/89
Date

Scott E. Thomas
Commissioner

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FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

THE FOLLOWING MATERIAL IS BEING ADDED TO THE PUBLIC FILE OF CLOSED MUR 2282 .

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
	)	
National Republican Senatorial Committee	)	**MUR 2282**
Frederick W. Bassinger as treasurer	)	

STATEMENT OF REASONS

Chairman Danny L. McDonald
Commissioner John Warren McGarry
Commissioner Scott E. Thomas

In Matter Under Review ("MUR") 2282, the Federal Election Commission and its General Counsel examined a massive candidate support effort initiated, planned, and carried out by the National Republican Senatorial Committee ("NRSC"). A single large-scale, NRSC solicitation raised over $2.3 million dollars in checks made out either to the NRSC or an NRSC sponsored project. No candidate names were mentioned on the checks. After the NRSC deposited these checks into an NRSC bank account, the NRSC gave $2.3 million dollars to twelve Republican senatorial candidates.

Applying the statute, legislative history, and Commission regulations to the facts of this case, we conclude that the $2.3 million given to the twelve Republican senatorial candidates by the NRSC were contributions to those candidates from the NRSC. Accordingly, we agree with the General Counsel's recommendation to find probable cause to believe that the NRSC violated 2 U.S.C. §441a(h) by exceeding the limitations on contributions to senate candidates and 2 U.S.C. §434(b) and 11 C.F.R. §110.6(d)(2) by failing to report as contributions the monies it had given.

I.

The Federal Election Campaign Act of 1971, as amended ("the Act"), limits the contributions and expenditures that may be made by party committees to or on behalf of candidates for federal office. 2 U.S.C. §441a. Section 441a(h) authorizes the "Republican or Democratic Senatorial Campaign Committee, or the national committee of a political party, or any combination of such committees" to contribute "not more than $17,500" to a senatorial candidate. The NRSC, which is a political committee organized specifically to support Republican candidates in elections for the United States Senate, is subject to the §441a(h) contribution limitation.

The Act also allows the national and state committees of the political parties to make so-called "coordinated expenditures" in connection with the general election campaigns of the parties' candidates, but such expenditures may not exceed certain dollar

limitations. 2 U.S.C. §441a(d).1/ Because the NRSC is not considered a "national" or "state" committee of a political party for §441a(d) purposes, it is not authorized by §441a(d) to make expenditures on behalf of candidates for election to the Senate. The national and state party committees may authorize the NRSC, however, to expend their respective §441a(d) allowance on their behalf. See FEC v. Democratic Senatorial Campaign Committee, 454 U.S. 27 (1981) ("FEC v. DSCC").2/

1/ Specifically, §441a(d) provides in pertinent part:

> (3) The national committee of a political party, or a State committee of a political party, including any subordinate committee of a State committee, may not make any expenditure in connection with the general election campaign of a candidate for Federal office in a State who is affiliated with such party which exceeds--
> (A) in the case of a candidate for election to the office of Senator, or of Representative from a State which is entitled to only one Representative, the greater of--
> (i) 2 cents multiplied by the voting age population of the State (as certified under subsection (e) of this section); or
> (ii) $20,000;

2/ The §441a(d) expenditure allowance is considerably larger than the allowable contribution limit for a Senate race. For the 1988 elections, even in the least populated States, the State party and national party were each entitled to spend $46,100 under §441a(d) for their Senate nominee. With the coordinated expenditure and contribution limit provisions, Congress struck a reasonable balance between the need to encourage party activity and the need to prevent parties from becoming a vehicle for evading the limits on contributions to candidates. Without the limits on party spending, a person could easily effect support on behalf of particular candidates in excess of the limits of 2 U.S.C. §441a(a)(1)(A) or (2)(A) by contributing not only to the candidate but also to party committees likely to spend on behalf of such candidates. Limits on party spending effectuate the underlying contribution limits of the Act by reducing the opportunity to assure additional candidate support through the parties.

In order to ensure that the contribution limitations are not evaded or circumvented, Congress enacted a number of provisions designed to prevent the indirect funneling of contributions to specific candidates. Of particular significance to this case, the statute attributes as contributions to a candidate not only those payments made to a candidate's authorized committee, §441a(a)(7)(A), but also those payments "earmarked" through an intermediary or conduit for a particular candidate, §441a(a)(8).3/ An intermediary or conduit is required to report the original source and intended recipient of the contributions to the Commission. See 11 C.F.R. 110.6(c). Moreover, an intermediary or conduit must forward earmarked contributions for an authorized candidate committee no later than 10 days after receipt. 11 C.F.R. §102.8(c).

The general rule with regard to the receipt of earmarked contributions by a conduit is that "a conduit or intermediary's contribution limits are not affected by passing on earmarked contributions, except where the conduit exercises any direction or control over the choice of the recipient candidate." 11 C.F.R. §110.6(d)(1) (emphasis added). When a conduit exercises such direction or control, "the contribution shall be considered a contribution by both the original contributor and the conduit,

3/ 2 U.S.C. §441a(a)(8) provides, in pertinent part:
For purposes of the limitations imposed by this section, all contributions made by a person, either directly or indirectly, on behalf of a particular candidate, including contributions which are in any way earmarked or otherwise directed through an intermediary or conduit to such candidate, shall be treated as contributions from such person to such candidate.

and shall be so reported by the conduit to the Commission." 11 C.F.R. §110.6(d)(2).

II.

In September of 1986, the NRSC sent a solicitation letter signed by Vice President George Bush to 565,239 individuals across the country. Each version 4/ of the letter began by stating the concern of President Reagan and Vice President Bush that "a shift of just 4 seats will give control of the Senate back to the Democrats." (emphasis in the original). The letter stated that Republican senatorial candidates in four named states were "on the verge of running out of money," cited a specific total ($236,500 each) without which they would lose, and requested a specific amount from the solicitees which was to be divided equally among the four unnamed candidates chosen by NRSC. There was no opportunity for the contributor to designate any other candidate.

Each letter was accompanied by a reply form which listed the figure mentioned in the letter, a higher amount, or "other" as possible contribution amounts. The reply form listed the same four states as were named in the letter and contained the statement, "to make sure our candidates have the funds they need, I'm enclosing the most generous contribution I can to be split equally among them."

4/ Twelve campaigns were cited in the twenty-four different versions of the letter sent out, although some appeared more often than others. For example, South Dakota appeared in eighteen versions, Nevada and Alabama in twelve and the rest in six each.

In response to the NRSC solicitation, over 43,000 individuals sent in a total of $2,340,664 in earmarked contributions. The 43,000 checks received by the NRSC were made payable to either the NRSC or the Republican Presidential Task Force or the Republican Inner Circle. All contributions received by the NRSC were deposited by the NRSC into an NRSC controlled bank account. Disbursements to the various candidates were made by the NRSC through wire transfers or checks from the NRSC account bearing the heading "National Republican Senatorial Committee." The total cost to the NRSC of the solicitation was $672,000 of which $63,432 was reimbursed by the candidate committees which received the contributions generated or applied against the NRSC's §441a(d) expenditure limitations. The NRSC paid the remaining $608,568 in costs related to the unsuccessful solicitations and did not allocate these costs to the candidate committees.

On October 28, 1986, Common Cause filed a complaint with the Federal Election Commission alleging that the National Republican Senatorial Committee had made contributions to Republican Senate candidates in excess of the §441a(h) limitations. The complaint described the September 2, 1986, NRSC solicitation and the subsequent transmission of contributions to candidates by the NRSC. The complaint stated that the contributions which the NRSC reported as earmarked by the contributors were not, in fact, earmarked by them. The complaint further stated that even if these contributions were viewed as earmarked, the NRSC exercised

direction and control over the choice of the recipient candidates.

The Office of General Counsel prepared a report for Commission consideration that contained a factual and legal analysis of the allegations presented in the Common Cause complaint. On April 7, 1987, the Commission unanimously agreed with the General Counsel's recommendations and found reason to believe that the NRSC and Richard G. Nelson, as treasurer, had violated 2 U.S.C. §441a(h) by exceeding the NRSC's contribution limitation. The Commission also found reason to believe that respondents had violated 2 U.S.C. §434(b) and 11 C.F.R. §110.6(d)(2) by failing to report contributions to candidates for the Senate over which, as a conduit, the NRSC had exercised direction or control. The Commission further found reason to believe that the NRSC had violated 2 U.S.C. §441d(a) by failing to use a complete or proper disclaimer on certain solicitations.

After a comprehensive investigation and review of the numerous responses and materials submitted by the NRSC, the Office of General Counsel prepared a report for Commission consideration analyzing the pertinent factual and legal issues. Among its findings, the General Counsel recommended that the Commission find probable cause to believe that the NRSC violated 2 U.S.C. §434(b) and 11 C.F.R. §110.6(d)(2) by failing to report as contributions from itself approximately $2,718,813.60 (this amount included the $2.3 million received from the September, 1986 solicitation and forwarded to the candidates) in

contributions forwarded in 1986 to the authorized committees of twelve Senate candidates. The General Counsel found that the NRSC had exercised direction or control over the selection of the recipient candidates to be benefited by its fundraising activity, thereby becoming a contributor of the earmarked funds solicited and forwarded to the campaigns.

A motion to adopt the General Counsel's recommendation regarding direction or control by the NRSC failed to secure the four affirmative votes necessary to make a probable cause to believe determination. 5/ 2 U.S.C. §437g(a)(4). Three Commissioners supported the General Counsel's recommendation and three Commissioners opposed the recommendation.

5/ By a vote of 6-0, the Commission agreed with the General Counsel's recommendation to find probable cause to believe that the NRSC violated (1) §434(b) by failing to report as contributions from itself $108,086 in contributions earmarked for the NRSC but forwarded to six committees as contributions from individuals; (2) §434(b) by failing to report as in-kind contributions to twelve authorized committees $608,568 in solicitation costs; and (3) §441d by failing to include a proper disclaimer on its solicitation.

The General Counsel also recommended that the Commission find probable cause to believe that the NRSC had violated §441a(h) by $3,222,165. This figure included the $2.3 million in contributions over which the NRSC had exercised direction or control. The Commission did not vote on this recommendation, however, since it had already split 3-3 on whether the $2.3 million should be viewed as a contribution for reporting purposes from the NRSC to the twelve candidate committees. Removing the direction or control amount and other NRSC monies sent to the twelve candidate committees during the same time period, the Commission found probable cause to believe that the NRSC exceeded the contribution limitations of §441a(h) by $534,249. This figure represented previously unallocated solicitation costs, the non-earmarked contributions and reported NRSC contributions less the §441a(h) and remaining §441a(d) limitations.

On December 23, 1988, the Commission accepted a conciliation agreement signed by the NRSC in settlement of the violation of 2 U.S.C. §§434(b), 441a(h) and 441d(a). In the conciliation agreement, the NRSC admitted that they had violated the provisions of the Act and agreed to pay a civil penalty of $20,000.

III.

This case is about the circumvention of the contribution limitations. In the 1986 elections, the NRSC targeted twelve Senate races for victory in order to retain majority control of the United States Senate. To achieve this end, the NRSC virtually exhausted the statutorily available means of candidate support for each of these twelve candidates. The NRSC made full use of the §441a(d) expenditure allowance assigned to it by the twelve state parties as well as the $17,500 per candidate contribution provision of §441a(h). This, however, was not enough. In order to augment the applicable contribution limits under the Act and funnel more money to its candidates, the NRSC devised the fundraising scheme which is at issue in this case.

We agree with the Commission's General Counsel that the NRSC exercised "direction or control" when it raised and funneled an additional $2.3 million to the twelve Republican senatorial candidates. We believe that this result is consistent with previous matters in which the Commission has set out the analysis for determining whether a conduit or intermediary has exercised direction or control. Moreover, this result effectuates the legislative intent that political committees may not use intermediary or conduit status as a vehicle for widescale circumvention of the contribution limitations.

A.

The "direction or control" provision contained in 11 C.F.R. §110.6(d)(2) expressly reflects congressional concern that the contribution limitations not be circumvented in any way:

> It is the understanding of the committee that the following rule will apply with respect to the application of the contribution limitations established by subsection (b): if a person exercises any direct or indirect control over the making of a contribution, then such contribution shall count toward the limitation imposed with respect to such person under subsection (b), but it will not count toward such a person's contribution limitation when it is demonstrated that such person exercised no direct or indirect control over the making of the contribution involved.

H.R. Rep. No. 1239, 93d Cong., 2d Sess. 16 (1974)(emphasis added). In deciding whether a person has exercised "any direct or indirect control," the Commission has applied a "totality of the circumstances" test and looked to several factors. Specifically, the Commission has focused on the degree to which the conduit influences the making and transmittal of the contribution, including choosing the recipient candidate, deciding on the total amount to be forwarded, establishing suggested contribution levels and affecting the timing of the contribution.

In Advisory Opinion 1986-4, 1 Fed. Elec. Camp. Fin. Guide (CCH), ¶ 5846, issued six months before the NRSC sent out its September 2, 1986 mailing,6/ the Commission applied the totality of the circumstances test to proposed fundraising activity by Armstrong World Industries, Inc. ("Armstrong"). Responding to solicitations for contributions from federal candidates, Armstrong planned to determine whether a contribution should be made and, where appropriate, the total amount of the contribution. Once it decided to provide a candidate with contributions, Armstrong proposed to solicit those contributions from likely contributors it had "matched-up" with specific candidates. Armstrong planned to collect these contribution checks, made payable to the candidate's committee, and then send these checks to Armstrong's Washington office which, in turn would deliver the bundled checks to the candidate's committee. In a unanimous opinion, the Commission concluded that "Armstrong will, in the totality of these circumstances, exercise direction

6/ Any doubts which an organization might have about its rights and obligations under the Act may be cleared up by obtaining a binding advisory opinion from the Commission. The courts have long viewed the Commission's advisory opinion process as a "prompt means of resolving doubts with respect to the statute's reach." Martin Tractor Co. v. FEC, 627 F.2d 375, 384 (D.C. Cir. 1980), cert. denied, 449 U.S. 954 (1980)(emphasis added). On a number of occasions, the NRSC has successfully utilized the advisory opinion process. See, e.g., Advisory Opinions 1978-25, 1978-64, 1980-119 and 1983-8 reported respectively at 1 Fed. Elec. Camp. Guide (CCH), ¶¶ 5315 and 5320, 5347, 5561 and 5713.

The NRSC, however, chose not to ask for an advisory opinion on its proposed fundraising activity at issue in MUR 2282 despite the serious problems suggested with that course by Advisory Opinion 1986-4.

and control over the making of such earmarked contributions as well as act as the conduit and intermediary for them." (emphasis added.) 7/

In reaching its conclusion, the Commission expressly noted that the facts of Advisory Opinion 1986-4 were "materially indistinguishable" from an opinion it had issued some 10 years earlier. In Advisory Opinion Request 1976-92, an organization proposed a solicitation plan whereby it would make a decision as to which candidates it wished to support and the amount of the contribution. 1 Fed. Elec. Camp. Fin. Guide (CCH), ¶ 6951. If a candidate were recommended for support, a program administrator would solicit contributions from individuals selected by the administrator on the basis of potential interest in a particular candidate. The contributors would make their checks payable to the candidate's committee but the administrator would collect the

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7/ In spite of the General Counsel's contrary recommendation, three Commissioners decided that the NRSC exercised no direction or control. One Commissioner, who filed a Statement of Reasons for his vote, has emphatically rejected the use of a "totality of the circumstances" test:

> As evidenced...by the arguments of the Commissioners who approved it, the 'totality' approach substitutes subjective and colloquial meanings for "direction or control" in place of any objectively recognizable legal meaning. That approach abandons all pretense of legal argument and simply deteriorates into moralizing about the propriety of contemporary fundraising methods.

Josefiak Statement of Reasons at 3 (emphasis added.) We note, however, that the author of the above statement did join the unanimous opinion of the Commission and voted for the use of the totality of the circumstances approach in Advisory Opinion 1986-4.

checks and forward them to the candidate. As in Advisory Opinion 1986-4, the Commission concluded that the earmarked contributions would be viewed as contributions from both the individuals who made the original contribution as well as the conduit committee.

By contrast, in Advisory Opinion 1981-57, 1 Fed. Elec. Camp. Fin. Guide (CCH), ¶ 5636, the Commission held permissible a plan whereby union members could authorize payroll deduction amounts to be forwarded to the separate segregated fund and then on to candidates specified by them. Unlike MUR 2282 and Advisory Opinion 1986-4 and Re: Advisory Opinion Request 1976-92, the facts in Advisory Opinion 1981-57 showed that there was no direction or control since members would be advised that "they may earmark their contributions to any candidate or political committee." (emphasis added.) Further, in obtaining payroll deduction agreements, the separate segregated fund "would not limit [contributors] to a particular candidate or group of candidates."

B.

In MUR 2282, the NRSC selected specific candidates whom it intended to help, "matched-up" particular would-be contributors with those particular candidates, confined the contributor's choice of recipients to those particular candidates, suggested the amount to be given by the particular contributor, arranged for the checks to be made payable to the NRSC, deposited the funds in an NRSC account, and then forwarded such funds to the

candidates. This activity, painstakingly choreographed by the NRSC so that the resulting contributions to particular candidates were all but preordained, is the very epitome of direction or control.

At the outset, it is important to recognize that the NRSC's September 2, 1986 mailing was not a general fundraising letter. Rather, the NRSC had selected and prioritized specific candidates whom it intended to support. In the mailing, the NRSC solicited contributions for twelve Senate campaigns with a particular emphasis on what the NRSC believed to be close Senate races in South Dakota, Nevada and Alabama.

Having decided that it wished to support specific candidates, the NRSC sought to "match-up" particular contributors from its "donor base" with particular candidates. MUR 2282, NRSC December 15, 1986 Response, Affidavit of NRSC Comptroller Preztunik at ¶3. To this end, the NRSC sent out 24 different versions of the September 2, 1986 letter. Half of those targeted for contributions were previous contributors to the NRSC or an NRSC sponsored program. The NRSC has stated that "[i]n connection with its own fundraising...the NRSC has developed a large group of reliable supporters." MUR 2282, NRSC December 15, 1986 Response at 4. The NRSC concedes that particular Senate races were "matched-up" with these "reliable" contributors: "[T]he state groups were determined on the basis of the NRSC's belief that potential contributors would most likely be inclined to assist the candidates with earmarked contributions in the races

that were the closest." MUR 2282, NRSC June 1, 1987 Response reprinted in General Counsel's Probable Cause Brief, Attachment 1, page 10. Indeed, the General Counsel's investigation revealed that the solicitation was so specific that even "the amount of the joint contribution requested of each potential contributor varied from version to version according to the mailing list used, the list in turn reflecting either the prior contribution history of the prospective contributors or the fact that the persons being contacted were prospects, not earlier contributors." MUR 2282, General Counsel's Probable Cause Brief at 3.

Once the NRSC had matched up a particular contributor to a particular group of candidates, it confined the choice of the contributors to those candidates. In Advisory Opinion 1981-57, no direction or control was found where the solicitation was not limited to a particular candidate or group of candidates and would-be contributors were advised that they may earmark their contributions to any candidate or group of candidates. These contributor opportunities, however, are not present in this case. Rather, as in Advisory Opinion 1986-4 where direction or control was found, an individual solicited by the NRSC could contribute only to the particular candidates to whom he was directed by the NRSC. The reply form did not provide contributors with a means to designate their contributions for other candidates. The NRSC did not want to give any suggestion to the recipients of its mailings that they would have the flexibility to make their

checks payable to only one or two of the candidates alluded to in the solicitation, or to candidates not mentioned in the solicitation, or even to the NRSC itself. If the recipient of the NRSC solicitation wished to contribute there was but one choice -- write a check that would be automatically divided among four candidates selected by the NRSC.

Not only were would-be contributors limited in their choice of candidate, but they were also limited in deciding the amount of the contribution to a candidate. Without exception, a contribution to the NRSC account was equally split between the four candidates alluded to in the solicitation. Nor did the NRSC indicate that any distribution other than a four way split was possible. Instead, the NRSC simply announced what would automatically be done with a contribution that was remitted in response to the solicitation. By insisting that contributors had to give specific amounts which were automatically split between four candidates, the NRSC, not the contributor, effectively controlled how much a candidate would receive from a contribution.

As the final element of NRSC's fundraising scheme, contributor checks were made payable to the NRSC -- not the candidate -- and deposited in an NRSC account before they were funneled by the NRSC to the candidates. The contributor was directed to use the NRSC as the only means for delivery of a contribution to a candidate. It is beyond dispute that money

deposited in a bank account set up by the NRSC was under the NRSC's control.

The NRSC asserts that its conduit program was similar to solicitation programs at issue in Advisory Opinion 1980-46 and MUR 1028 where the Commission found no "direction or control." In Advisory Opinion 1980-46, 1 Fed. Elec. Camp. Fin. Guide (CCH), ¶5508, the Commission held that a plan, whereby the National Conservative Political Action Committee ("NCPAC") suggested contributions to a specified candidate and fowarded contributor checks, did not require attribution of amounts forwarded to NCPAC's contribution limit. And in MUR 1028, the Commission found that there was no statutory violation in a plan whereby the Council for a Livable World sent mailings suggesting that a contribution be sent to a particular candidate. No contribution amount was suggested, and contributions to candidates were to be in the form of checks made payable to the recipient candidate's committee.

These cases are readily distinguishable from the present matter. First, there was no indication in the NCPAC request of whether the "suggestion" to contribute to a particular candidate was presented as the only option or as one of several options (for example, sending a contribution directly to the candidate, sending an unearmarked contribution to NCPAC, or sending an earmarked contribution to NCPAC). Without the specific text of NCPAC's proposal before it, the Commission could not presume it was dealing with a communication clearly limiting the solicitee's

choice to the single option of sending an earmarked contribution on behalf of a specific candidate. Such a distinction must be part of the "direction or control" analysis as demonstrated by MUR 1028 where solicitees were given the additional option of making an unearmarked contribution to Council for a Livable World. In contrast, the NRSC's communications clearly confined the solicitees' option to making an earmarked contribution on behalf of specified candidates only. This provided an element of direction or control over the solicitees' choice not evident in AO 1980-46 and MUR 1028.

A second distinction is that in AO 1980-46 and MUR 1028 there was no apparent suggestion as to the amount to be contributed. The NRSC's plea for a specified amount confined the solicitees' choice. Indeed, the contributors were not advised that they could give to only certain of the listed campaigns or give more to one campaign than the other. The amount contributed would be automatically apportioned in equal amounts among the four specified races.

Finally, in AO 1980-46 and MUR 1028 the contributions collected were not in the form of checks payable to and deposited in the conduit's own bank account. Here the checks were made payable to the NRSC and deposited in its accounts. 8/ Even though the NRSC had some obligation to forward these earmarked

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8/ This distinction alone undermines the NRSC's reliance on Advisory Opinion 1980-46. The Act specifically states that an advisory opinion can only be relied on by another person if the "specific transaction or activity [is] indistinguishable in all its material aspects...." 2 U.S.C. §437f(c)(1)(B).

contributions within a certain time, see 2 U.S.C. §432(b)(2), as a practical matter it could control the time of forwarding within those parameters and had use of the funds until it did forward them.

To the extent respondents suggest that under Advisory Opinion 1980-46 no direction or control exists so long as the solicited individual has an opportunity to decide against making a contribution, 9/ this legal conclusion is inconsistent with previous and subsequent Commission advisory opinions and furthermore, we are hard-pressed to find any subsequent advisory opinion which stands for this remarkable proposition. In an early Advisory Opinion Request, 1976-92, supra, the Commission found "direction or control" present in a solicitation plan even though the solicited individual had a clear opportunity to decide against making a contribution. Likewise in a later advisory opinion, AO 1986-4, supra, the Commission found "direction or control" present in a solicitation plan even though the solicited

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9/ Unfortunately, the Commission's analysis in Advisory Opinion 1980-46 was less than complete. The question of direction or control was only one of several issues discussed in AO 1980-46 and was, in fact, overshadowed by the question of whether NCPAC's proposed activity constituted independent expenditures. See Dissenting Views of Commissioner Friedersdorf and Dissenting Opinion of Commissioner Aikens.

individual had a clear opportunity to decide against making a contribution. Indeed, if respondents' narrow reading of AO 1980-46 were adopted, it is difficult to imagine a set of circumstances under which direction or control could be found since all solicitations, by definition, provide the solicited individual an opportunity to decline the solicitation.

In our opinion, the General Counsel properly considered the totality of the circumstances in this matter. In deciding whether the NRSC exercised direction or control over the making of earmarked contributions, the General Counsel made the following finding:

> [T]he NRSC directed the attention of particular groups of potential contributors to particular races, urged the contribution of specific amounts to reach specified goals, and acquired control over the contributions received by having the checks made payable to itself and by depositing those checks into its own account.

MUR 2282, General Counsel's Probable Cause Brief at 17. We concur with these findings and agree with the General Counsel's conclusion that "this combination of solicitation methods and direct involvement in the flow of funds between the contributors and the recipient committees...clearly constituted 'direction or control.'" Id.

C.

At issue in MUR 2282 is the NRSC funding of Republican Senate candidates in twelve states. Each of these twelve states as well as the national party authorized the NRSC to make §441a(d) expenditures on their behalf. As a result of these authorizations, NRSC spent $4.5 million of the $4.7 million it was allowed to spend on behalf of these twelve Republican candidates.

In addition, the NRSC was allowed to contribute up to $17,500 to each of the twelve Republican candidates pursuant to §441a(h). This represented an additional $210,000 which could be spent on the twelve Senate races. As with its §441a(d) limits, the NRSC virtually exhausted its §441a(h) limit when it contributed nearly $185,000 of the $210,000 available directly to the twelve candidates.

Beyond the §441a(d) and §441a(h) activity, the NRSC spent an additional $3 million on these twelve Republican Senate candidates. The figures indicate that the NRSC spent $600,000 to raise over $2.3 million in earmarked contributions for these candidates. In addition, there was over $100,000 that was earmarked for the NRSC but distributed by the NRSC to six of the Senate candidates.

Viewed in this context, it is easy to understand why MUR 2282 concerns the integrity of the contribution limitations.

Through §441a(d) and §441a(h), Congress provided generous allowances for party activity in Senate election races. Yet, Congress did not intend that party expenditures and contributions be open-ended and without limits. Not only do the very terms of these provisions expressly limit expenditures and contributions by party committees, see n.2 and p.2, supra, but the legislative history clearly underscores that intent.

In passing §441a(d), Congress sought to "allow the parties to play a strong role in the electoral process, while at the same time assuring that limitations are placed on their activities." H.R. Rep. No. 93-1239, 93d Cong., 2d Sess. 157 (1974)(supplemental views of Rep. Frenzel). Congressional recognition of the need to place some limitations on party activity is clear from the 1974 FECA legislative history. At one point, the Senate passed an amendment proposed by Senator Brock that would have exempted congressional campaign committees such as the NRSC from the Act's expenditure limits. 120 Cong. Rec. S5189 - S5191 (daily ed. April 3, 1974). The Senate reversed itself, however, five days later. 120 Cong. Rec. S5411 - S5415 (daily ed. April 8, 1974). Successfully urging repeal of the Brock Amendment, Senator Clark noted the "loophole" created by the Brock Amendment and stated, "To permit unlimited expenditures would be a serious mistake." 120 Cong. Rec. S5413, S5414 (daily ed. April 8, 1974)(remarks of Senator Clark).

Similarly, calls for increased party activity were balanced with a recognition that limitations on such activity were needed

during the passage of §441a(h) in 1976. As originally proposed by Senator Johnston, the provision would have increased to $20,000 the amounts which the Democratic or Republican Senatorial Campaign Committee could contribute to senatorial candidates. Prior to the Johnston Amendment, the senatorial committees were limited to $5,000 per election or a total of $10,000 for both the primary and general elections. Despite criticism that the amendment "carved out" an unnecessary exception for party committees and would "open up the flood gates" of increased election spending, the amendment passed the Senate. See 122 Cong. Rec. S3807-3808 (daily ed. March 18, 1976)(remarks of Senator Clark). At conference, however, the $20,000 figure was trimmed back to the $17,500 figure currently found in §441a(h). H.R. Rep. No. 94-1057, 94th Cong., 2d Sess. 59 (1976).

Applying this legislative history to the facts of this case, we think Congress did not intend to allow NRSC to supplement its §441a(d) and §441a(h) limits by orchestrating approximately $2.3 million in earmarked contributions. We believe that through a series of complex and sophisticated fundraising techniques, the NRSC sought to do indirectly what it could not do directly -- provide a specified amount of contributions for particular candidates. Such fundraising activity plainly circumvents the contribution limitations carefully prescribed by Congress.

IV.

Consistent with the Commission's prior rulings in this area, we agree with the Commission's General Counsel that the NRSC exercised "direction or control" over the making of $2.3 million dollars in earmarked contributions. Accordingly, we agree with the General Counsel's recommendations to find probable cause to believe that the NRSC violated 2 U.S.C. §434(b) and 11 C.F.R. §110.6(d)(2) by failing to report as contributions from itself approximately $2.3 million in contributions forwarded in 1986 to the authorized committees of twelve Senate candidates.

6-2-89
Date

Danny Lee McDonald
Chairman

6/2/89
Date

John Warren McGarry
Commissioner

6/2/89
Date

Scott E. Thomas
Commissioner

FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

THE FOLLOWING MATERIAL IS BEING ADDED TO THE PUBLIC FILE OF CLOSED MUR 2282 .

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

FEDERAL ELECTION COMMISSION

In the Matter of	)	
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	)	
National Republican Senatorial Committee	)	MUR 2282
Frederick W. Bassinger as treasurer	)	
	)	

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STATEMENT OF REASONS

Chairman Danny L. McDonald
Commissioner John Warren McGarry
Commissioner Scott E. Thomas

In Matter Under Review ("MUR") 2282, the Federal Election Commission and its General Counsel examined a massive candidate support effort initiated, planned, and carried out by the National Republican Senatorial Committee ("NRSC"). A single large-scale, NRSC solicitation raised over $2.3 million dollars in checks made out either to the NRSC or an NRSC sponsored project. No candidate names were mentioned on the checks. After the NRSC deposited these checks into an NRSC bank account, the NRSC gave $2.3 million dollars to twelve Republican senatorial candidates.

Applying the statute, legislative history, and Commission regulations to the facts of this case, we conclude that the $2.3 million given to the twelve Republican senatorial candidates by the NRSC were contributions to those candidates from the NRSC. Accordingly, we agree with the General Counsel's recommendation to find probable cause to believe that the NRSC violated 2 U.S.C. §441a(h) by exceeding the limitations on contributions to senate candidates and 2 U.S.C. §434(b) and 11 C.F.R. §110.6(d)(2) by failing to report as contributions the monies it had given.

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I.

The Federal Election Campaign Act of 1971, as amended ("the Act"), limits the contributions and expenditures that may be made by party committees to or on behalf of candidates for federal office. 2 U.S.C. §441a. Section 441a(h) authorizes the "Republican or Democratic Senatorial Campaign Committee, or the national committee of a political party, or any combination of such committees" to contribute "not more than $17,500" to a senatorial candidate. The NRSC, which is a political committee organized specifically to support Republican candidates in elections for the United States Senate, is subject to the §441a(h) contribution limitation.

The Act also allows the national and state committees of the political parties to make so-called "coordinated expenditures" in connection with the general election campaigns of the parties' candidates, but such expenditures may not exceed certain dollar

limitations. 2 U.S.C. §441a(d).1/ Because the NRSC is not considered a "national" or "state" committee of a political party for §441a(d) purposes, it is not authorized by §441a(d) to make expenditures on behalf of candidates for election to the Senate. The national and state party committees may authorize the NRSC, however, to expend their respective §441a(d) allowance on their behalf. See FEC v. Democratic Senatorial Campaign Committee, 454 U.S. 27 (1981) ("FEC v. DSCC").2/

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1/ Specifically, §441a(d) provides in pertinent part:

> (3) The national committee of a political party, or a State committee of a political party, including any subordinate committee of a State committee, may not make any expenditure in connection with the general election campaign of a candidate for Federal office in a State who is affiliated with such party which exceeds--
> (A) in the case of a candidate for election to the office of Senator, or of Representative from a State which is entitled to only one Representative, the greater of--
> (i) 2 cents multiplied by the voting age population of the State (as certified under subsection (e) of this section); or
> (ii) $20,000;

2/ The §441a(d) expenditure allowance is considerably larger than the allowable contribution limit for a Senate race. For the 1988 elections, even in the least populated States, the State party and national party were each entitled to spend $46,100 under §441a(d) for their Senate nominee. With the coordinated expenditure and contribution limit provisions, Congress struck a reasonable balance between the need to encourage party activity and the need to prevent parties from becoming a vehicle for evading the limits on contributions to candidates. Without the limits on party spending, a person could easily effect support on behalf of particular candidates in excess of the limits of 2 U.S.C. §441a(a)(1)(A) or (2)(A) by contributing not only to the candidate but also to party committees likely to spend on behalf of such candidates. Limits on party spending effectuate the underlying contribution limits of the Act by reducing the opportunity to assure additional candidate support through the parties.

In order to ensure that the contribution limitations are not evaded or circumvented, Congress enacted a number of provisions designed to prevent the indirect funneling of contributions to specific candidates. Of particular significance to this case, the statute attributes as contributions to a candidate not only those payments made to a candidate's authorized committee, §441a(a)(7)(A), but also those payments "earmarked" through an intermediary or conduit for a particular candidate, §441a(a)(8).3/ An intermediary or conduit is required to report the original source and intended recipient of the contributions to the Commission. See 11 C.F.R. 110.6(c). Moreover, an intermediary or conduit must forward earmarked contributions for an authorized candidate committee no later than 10 days after receipt. 11 C.F.R. §102.8(c).

The general rule with regard to the receipt of earmarked contributions by a conduit is that "a conduit or intermediary's contribution limits are not affected by passing on earmarked contributions, except where the conduit exercises any direction or control over the choice of the recipient candidate." 11 C.F.R. §110.6(d)(1) (emphasis added). When a conduit exercises such direction or control, "the contribution shall be considered a contribution by both the original contributor and the conduit,

3/ 2 U.S.C. §441a(a)(8) provides, in pertinent part:
For purposes of the limitations imposed by this section, all contributions made by a person, either directly or indirectly, on behalf of a particular candidate, including contributions which are in any way earmarked or otherwise directed through an intermediary or conduit to such candidate, shall be treated as contributions from such person to such candidate.

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and shall be so reported by the conduit to the Commission." 11 C.F.R. §110.6(d)(2).

II.

In September of 1986, the NRSC sent a solicitation letter signed by Vice President George Bush to 565,239 individuals across the country. Each version 4/ of the letter began by stating the concern of President Reagan and Vice President Bush that "a shift of just 4 seats will give control of the Senate back to the Democrats." (emphasis in the original). The letter stated that Republican senatorial candidates in four named states were "on the verge of running out of money," cited a specific total ($236,500 each) without which they would lose, and requested a specific amount from the solicitees which was to be divided equally among the four unnamed candidates chosen by NRSC. There was no opportunity for the contributor to designate any other candidate.

Each letter was accompanied by a reply form which listed the figure mentioned in the letter, a higher amount, or "other" as possible contribution amounts. The reply form listed the same four states as were named in the letter and contained the statement, "to make sure our candidates have the funds they need, I'm enclosing the most generous contribution I can to be split equally among them."

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4/ Twelve campaigns were cited in the twenty-four different versions of the letter sent out, although some appeared more often than others. For example, South Dakota appeared in eighteen versions, Nevada and Alabama in twelve and the rest in six each.

In response to the NRSC solicitation, over 43,000 individuals sent in a total of $2,340,664 in earmarked contributions. The 43,000 checks received by the NRSC were made payable to either the NRSC or the Republican Presidential Task Force or the Republican Inner Circle. All contributions received by the NRSC were deposited by the NRSC into an NRSC controlled bank account. Disbursements to the various candidates were made by the NRSC through wire transfers or checks from the NRSC account bearing the heading "National Republican Senatorial Committee." The total cost to the NRSC of the solicitation was $672,000 of which $63,432 was reimbursed by the candidate committees which received the contributions generated or applied against the NRSC's $441a(d) expenditure limitations. The NRSC paid the remaining $608,568 in costs related to the unsuccessful solicitations and did not allocate these costs to the candidate committees.

On October 28, 1986, Common Cause filed a complaint with the Federal Election Commission alleging that the National Republican Senatorial Committee had made contributions to Republican Senate candidates in excess of the $441a(h) limitations. The complaint described the September 2, 1986, NRSC solicitation and the subsequent transmission of contributions to candidates by the NRSC. The complaint stated that the contributions which the NRSC reported as earmarked by the contributors were not, in fact, earmarked by them. The complaint further stated that even if these contributions were viewed as earmarked, the NRSC exercised

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direction and control over the choice of the recipient candidates.

The Office of General Counsel prepared a report for Commission consideration that contained a factual and legal analysis of the allegations presented in the Common Cause complaint. On April 7, 1987, the Commission unanimously agreed with the General Counsel's recommendations and found reason to believe that the NRSC and Richard G. Nelson, as treasurer, had violated 2 U.S.C. §441a(h) by exceeding the NRSC's contribution limitation. The Commission also found reason to believe that respondents had violated 2 U.S.C. §434(b) and 11 C.F.R. §110.6(d)(2) by failing to report contributions to candidates for the Senate over which, as a conduit, the NRSC had exercised direction or control. The Commission further found reason to believe that the NRSC had violated 2 U.S.C. §441d(a) by failing to use a complete or proper disclaimer on certain solicitations.

After a comprehensive investigation and review of the numerous responses and materials submitted by the NRSC, the Office of General Counsel prepared a report for Commission consideration analyzing the pertinent factual and legal issues. Among its findings, the General Counsel recommended that the Commission find probable cause to believe that the NRSC violated 2 U.S.C. §434(b) and 11 C.F.R. §110.6(d)(2) by failing to report as contributions from itself approximately $2,718,813.60 (this amount included the $2.3 million received from the September, 1986 solicitation and forwarded to the candidates) in

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contributions forwarded in 1986 to the authorized committees of twelve Senate candidates. The General Counsel found that the NRSC had exercised direction or control over the selection of the recipient candidates to be benefited by its fundraising activity, thereby becoming a contributor of the earmarked funds solicited and forwarded to the campaigns.

A motion to adopt the General Counsel's recommendation regarding direction or control by the NRSC failed to secure the four affirmative votes necessary to make a probable cause to believe determination. 5/ 2 U.S.C. §437g(a)(4). Three Commissioners supported the General Counsel's recommendation and three Commissioners opposed the recommendation.

5/ By a vote of 6-0, the Commission agreed with the General Counsel's recommendation to find probable cause to believe that the NRSC violated (1) §434(b) by failing to report as contributions from itself $108,086 in contributions earmarked for the NRSC but forwarded to six committees as contributions from individuals; (2) §434(b) by failing to report as in-kind contributions to twelve authorized committees $608,568 in solicitation costs; and (3) §441d by failing to include a proper disclaimer on its solicitation.

The General Counsel also recommended that the Commission find probable cause to believe that the NRSC had violated §441a(h) by $3,222,165. This figure included the $2.3 million in contributions over which the NRSC had exercised direction or control. The Commission did not vote on this recommendation, however, since it had already split 3-3 on whether the $2.3 million should be viewed as a contribution for reporting purposes from the NRSC to the twelve candidate committees. Removing the direction or control amount and other NRSC monies sent to the twelve candidate committees during the same time period, the Commission found probable cause to believe that the NRSC exceeded the contribution limitations of §441a(h) by $534,249. This figure represented previously unallocated solicitation costs, the non-earmarked contributions and reported NRSC contributions less the §441a(h) and remaining §441a(d) limitations.

On December 23, 1988, the Commission accepted a conciliation agreement signed by the NRSC in settlement of the violation of 2 U.S.C. §§434(b), 441a(h) and 441d(a). In the conciliation agreement, the NRSC admitted that they had violated the provisions of the Act and agreed to pay a civil penalty of $20,000.

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III.

This case is about the circumvention of the contribution limitations. In the 1986 elections, the NRSC targeted twelve Senate races for victory in order to retain majority control of the United States Senate. To achieve this end, the NRSC virtually exhausted the statutorily available means of candidate support for each of these twelve candidates. The NRSC made full use of the §441a(d) expenditure allowance assigned to it by the twelve state parties as well as the $17,500 per candidate contribution provision of §441a(h). This, however, was not enough. In order to augment the applicable contribution limits under the Act and funnel more money to its candidates, the NRSC devised the fundraising scheme which is at issue in this case.

We agree with the Commission's General Counsel that the NRSC exercised "direction or control" when it raised and funneled an additional $2.3 million to the twelve Republican senatorial candidates. We believe that this result is consistent with previous matters in which the Commission has set out the analysis for determining whether a conduit or intermediary has exercised direction or control. Moreover, this result effectuates the legislative intent that political committees may not use intermediary or conduit status as a vehicle for widescale circumvention of the contribution limitations.

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A.

The "direction or control" provision contained in 11 C.F.R. §110.6(d)(2) expressly reflects congressional concern that the contribution limitations not be circumvented in any way:

> It is the understanding of the committee that the following rule will apply with respect to the application of the contribution limitations established by subsection (b): if a person exercises any direct or indirect control over the making of a contribution, then such contribution shall count toward the limitation imposed with respect to such person under subsection (b), but it will not count toward such a person's contribution limitation when it is demonstrated that such person exercised no direct or indirect control over the making of the contribution involved.

H.R. Rep. No. 1239, 93d Cong., 2d Sess. 16 (1974)(emphasis added). In deciding whether a person has exercised "any direct or indirect control," the Commission has applied a "totality of the circumstances" test and looked to several factors. Specifically, the Commission has focused on the degree to which the conduit influences the making and transmittal of the contribution, including choosing the recipient candidate, deciding on the total amount to be forwarded, establishing suggested contribution levels and affecting the timing of the contribution.

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In Advisory Opinion 1986-4, 1 Fed. Elec. Camp. Fin. Guide (CCH), ¶ 5846, issued six months before the NRSC sent out its September 2, 1986 mailing,6/ the Commission applied the totality of the circumstances test to proposed fundraising activity by Armstrong World Industries, Inc. ("Armstrong"). Responding to solicitations for contributions from federal candidates, Armstrong planned to determine whether a contribution should be made and, where appropriate, the total amount of the contribution. Once it decided to provide a candidate with contributions, Armstrong proposed to solicit those contributions from likely contributors it had "matched-up" with specific candidates. Armstrong planned to collect these contribution checks, made payable to the candidate's committee, and then send these checks to Armstrong's Washington office which, in turn would deliver the bundled checks to the candidate's committee. In a unanimous opinion, the Commission concluded that "Armstrong will, in the totality of these circumstances, exercise direction

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6/ Any doubts which an organization might have about its rights and obligations under the Act may be cleared up by obtaining a binding advisory opinion from the Commission. The courts have long viewed the Commission's advisory opinion process as a "prompt means of resolving doubts with respect to the statute's reach." Martin Tractor Co. v. FEC, 627 F.2d 375, 384 (D.C. Cir. 1980), cert. denied, 449 U.S. 954 (1980)(emphasis added). On a number of occasions, the NRSC has successfully utilized the advisory opinion process. See, e.g., Advisory Opinions 1978-25, 1978-64, 1980-119 and 1983-8 reported respectively at 1 Fed. Elec. Camp. Guide (CCH), ¶¶ 5315 and 5320, 5347, 5561 and 5713.

The NRSC, however, chose not to ask for an advisory opinion on its proposed fundraising activity at issue in MUR 2282 despite the serious problems suggested with that course by Advisory Opinion 1986-4.

and control over the making of such earmarked contributions as well as act as the conduit and intermediary for them." (emphasis added.) 7/

In reaching its conclusion, the Commission expressly noted that the facts of Advisory Opinion 1986-4 were "materially indistinguishable" from an opinion it had issued some 10 years earlier. In Advisory Opinion Request 1976-92, an organization proposed a solicitation plan whereby it would make a decision as to which candidates it wished to support and the amount of the contribution. 1 Fed. Elec. Camp. Fin. Guide (CCH), ¶ 6951. If a candidate were recommended for support, a program administrator would solicit contributions from individuals selected by the administrator on the basis of potential interest in a particular candidate. The contributors would make their checks payable to the candidate's committee but the administrator would collect the

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7/ In spite of the General Counsel's contrary recommendation, three Commissioners decided that the NRSC exercised no direction or control. One Commissioner, who filed a Statement of Reasons for his vote, has emphatically rejected the use of a "totality of the circumstances" test:

> As evidenced...by the arguments of the Commissioners who approved it, the 'totality' approach substitutes subjective and colloquial meanings for "direction or control" in place of any objectively recognizable legal meaning. That approach abandons all pretense of legal argument and simply deteriorates into moralizing about the propriety of contemporary fundraising methods.

Josefiak Statement of Reasons at 3 (emphasis added.) We note, however, that the author of the above statement did join the unanimous opinion of the Commission and voted for the use of the totality of the circumstances approach in Advisory Opinion 1986-4.

checks and forward them to the candidate. As in Advisory Opinion 1986-4, the Commission concluded that the earmarked contributions would be viewed as contributions from both the individuals who made the original contribution as well as the conduit committee.

By contrast, in Advisory Opinion 1981-57, 1 Fed. Elec. Camp. Fin. Guide (CCH), ¶ 5636, the Commission held permissible a plan whereby union members could authorize payroll deduction amounts to be forwarded to the separate segregated fund and then on to candidates specified by them. Unlike MUR 2282 and Advisory Opinion 1986-4 and Re: Advisory Opinion Request 1976-92, the facts in Advisory Opinion 1981-57 showed that there was no direction or control since members would be advised that "they may earmark their contributions to any candidate or political committee." (emphasis added.) Further, in obtaining payroll deduction agreements, the separate segregated fund "would not limit [contributors] to a particular candidate or group of candidates."

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B.

In MUR 2282, the NRSC selected specific candidates whom it intended to help, "matched-up" particular would-be contributors with those particular candidates, confined the contributor's choice of recipients to those particular candidates, suggested the amount to be given by the particular contributor, arranged for the checks to be made payable to the NRSC, deposited the funds in an NRSC account, and then forwarded such funds to the

candidates. This activity, painstakingly choreographed by the NRSC so that the resulting contributions to particular candidates were all but preordained, is the very epitome of direction or control.

At the outset, it is important to recognize that the NRSC's September 2, 1986 mailing was not a general fundraising letter. Rather, the NRSC had selected and prioritized specific candidates whom it intended to support. In the mailing, the NRSC solicited contributions for twelve Senate campaigns with a particular emphasis on what the NRSC believed to be close Senate races in South Dakota, Nevada and Alabama.

Having decided that it wished to support specific candidates, the NRSC sought to "match-up" particular contributors from its "donor base" with particular candidates. MUR 2282, NRSC December 15, 1986 Response, Affidavit of NRSC Comptroller Preztunik at ¶3. To this end, the NRSC sent out 24 different versions of the September 2, 1986 letter. Half of those targeted for contributions were previous contributors to the NRSC or an NRSC sponsored program. The NRSC has stated that "[i]n connection with its own fundraising...the NRSC has developed a large group of reliable supporters." MUR 2282, NRSC December 15, 1986 Response at 4. The NRSC concedes that particular Senate races were "matched-up" with these "reliable" contributors: "[T]he state groups were determined on the basis of the NRSC's belief that potential contributors would most likely be inclined to assist the candidates with earmarked contributions in the races

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that were the closest." MUR 2282, NRSC June 1, 1987 Response reprinted in General Counsel's Probable Cause Brief, Attachment 1, page 10. Indeed, the General Counsel's investigation revealed that the solicitation was so specific that even "the amount of the joint contribution requested of each potential contributor varied from version to version according to the mailing list used, the list in turn reflecting either the prior contribution history of the prospective contributors or the fact that the persons being contacted were prospects, not earlier contributors." MUR 2282, General Counsel's Probable Cause Brief at 3.

Once the NRSC had matched up a particular contributor to a particular group of candidates, it confined the choice of the contributors to those candidates. In Advisory Opinion 1981-57, no direction or control was found where the solicitation was not limited to a particular candidate or group of candidates and would-be contributors were advised that they may earmark their contributions to any candidate or group of candidates. These contributor opportunities, however, are not present in this case. Rather, as in Advisory Opinion 1986-4 where direction or control was found, an individual solicited by the NRSC could contribute only to the particular candidates to whom he was directed by the NRSC. The reply form did not provide contributors with a means to designate their contributions for other candidates. The NRSC did not want to give any suggestion to the recipients of its mailings that they would have the flexibility to make their

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checks payable to only one or two of the candidates alluded to in the solicitation, or to candidates not mentioned in the solicitation, or even to the NRSC itself. If the recipient of the NRSC solicitation wished to contribute there was but one choice -- write a check that would be automatically divided among four candidates selected by the NRSC.

Not only were would-be contributors limited in their choice of candidate, but they were also limited in deciding the amount of the contribution to a candidate. Without exception, a contribution to the NRSC account was equally split between the four candidates alluded to in the solicitation. Nor did the NRSC indicate that any distribution other than a four way split was possible. Instead, the NRSC simply announced what would automatically be done with a contribution that was remitted in response to the solicitation. By insisting that contributors had to give specific amounts which were automatically split between four candidates, the NRSC, not the contributor, effectively controlled how much a candidate would receive from a contribution.

As the final element of NRSC's fundraising scheme, contributor checks were made payable to the NRSC -- not the candidate -- and deposited in an NRSC account before they were funneled by the NRSC to the candidates. The contributor was directed to use the NRSC as the only means for delivery of a contribution to a candidate. It is beyond dispute that money

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deposited in a bank account set up by the NRSC was under the NRSC's control.

The NRSC asserts that its conduit program was similar to solicitation programs at issue in Advisory Opinion 1980-46 and MUR 1028 where the Commission found no "direction or control." In Advisory Opinion 1980-46, 1 Fed. Elec. Camp. Fin. Guide (CCH), ¶5508, the Commission held that a plan, whereby the National Conservative Political Action Committee ("NCPAC") suggested contributions to a specified candidate and fowarded contributor checks, did not require attribution of amounts forwarded to NCPAC's contribution limit. And in MUR 1028, the Commission found that there was no statutory violation in a plan whereby the Council for a Livable World sent mailings suggesting that a contribution be sent to a particular candidate. No contribution amount was suggested, and contributions to candidates were to be in the form of checks made payable to the recipient candidate's committee.

These cases are readily distinguishable from the present matter. First, there was no indication in the NCPAC request of whether the "suggestion" to contribute to a particular candidate was presented as the only option or as one of several options (for example, sending a contribution directly to the candidate, sending an unearmarked contribution to NCPAC, or sending an earmarked contribution to NCPAC). Without the specific text of NCPAC's proposal before it, the Commission could not presume it was dealing with a communication clearly limiting the solicitee's

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choice to the single option of sending an earmarked contribution on behalf of a specific candidate. Such a distinction must be part of the "direction or control" analysis as demonstrated by MUR 1028 where solicitees were given the additional option of making an unearmarked contribution to Council for a Livable World. In contrast, the NRSC's communications clearly confined the solicitees' option to making an earmarked contribution on behalf of specified candidates only. This provided an element of direction or control over the solicitees' choice not evident in AO 1980-46 and MUR 1028.

A second distinction is that in AO 1980-46 and MUR 1028 there was no apparent suggestion as to the amount to be contributed. The NRSC's plea for a specified amount confined the solicitees' choice. Indeed, the contributors were not advised that they could give to only certain of the listed campaigns or give more to one campaign than the other. The amount contributed would be automatically apportioned in equal amounts among the four specified races.

Finally, in AO 1980-46 and MUR 1028 the contributions collected were not in the form of checks payable to and deposited in the conduit's own bank account. Here the checks were made payable to the NRSC and deposited in its accounts. 8/ Even though the NRSC had some obligation to forward these earmarked

8/ This distinction alone undermines the NRSC's reliance on Advisory Opinion 1980-46. The Act specifically states that an advisory opinion can only be relied on by another person if the "specific transaction or activity [is] indistinguishable in all its material aspects...." 2 U.S.C. §437f(c)(1)(B).

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contributions within a certain time, see 2 U.S.C. §432(b)(2), as a practical matter it could control the time of forwarding within those parameters and had use of the funds until it did forward them.

To the extent respondents suggest that under Advisory Opinion 1980-46 no direction or control exists so long as the solicited individual has an opportunity to decide against making a contribution, 9/ this legal conclusion is inconsistent with previous and subsequent Commission advisory opinions and furthermore, we are hard-pressed to find any subsequent advisory opinion which stands for this remarkable proposition. In an early Advisory Opinion Request, 1976-92, supra, the Commission found "direction or control" present in a solicitation plan even though the solicited individual had a clear opportunity to decide against making a contribution. Likewise in a later advisory opinion, AO 1986-4, supra, the Commission found "direction or control" present in a solicitation plan even though the solicited

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9/ Unfortunately, the Commission's analysis in Advisory Opinion 1980-46 was less than complete. The question of direction or control was only one of several issues discussed in AO 1980-46 and was, in fact, overshadowed by the question of whether NCPAC's proposed activity constituted independent expenditures. See Dissenting Views of Commissioner Friedersdorf and Dissenting Opinion of Commissioner Aikens.

individual had a clear opportunity to decide against making a contribution. Indeed, if respondents' narrow reading of AO 1980-46 were adopted, it is difficult to imagine a set of circumstances under which direction or control could be found since all solicitations, by definition, provide the solicited individual an opportunity to decline the solicitation.

In our opinion, the General Counsel properly considered the totality of the circumstances in this matter. In deciding whether the NRSC exercised direction or control over the making of earmarked contributions, the General Counsel made the following finding:

> [T]he NRSC directed the attention of particular groups of potential contributors to particular races, urged the contribution of specific amounts to reach specified goals, and acquired control over the contributions received by having the checks made payable to itself and by depositing those checks into its own account.

MUR 2282, General Counsel's Probable Cause Brief at 17. We concur with these findings and agree with the General Counsel's conclusion that "this combination of solicitation methods and direct involvement in the flow of funds between the contributors and the recipient committees...clearly constituted 'direction or control.'" Id.

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C.

At issue in MUR 2282 is the NRSC funding of Republican Senate candidates in twelve states. Each of these twelve states as well as the national party authorized the NRSC to make $441a(d) expenditures on their behalf. As a result of these authorizations, NRSC spent $4.5 million of the $4.7 million it was allowed to spend on behalf of these twelve Republican candidates.

In addition, the NRSC was allowed to contribute up to $17,500 to each of the twelve Republican candidates pursuant to $441a(h). This represented an additional $210,000 which could be spent on the twelve Senate races. As with its $441a(d) limits, the NRSC virtually exhausted its $441a(h) limit when it contributed nearly $185,000 of the $210,000 available directly to the twelve candidates.

Beyond the $441a(d) and $441a(h) activity, the NRSC spent an additional $3 million on these twelve Republican Senate candidates. The figures indicate that the NRSC spent $600,000 to raise over $2.3 million in earmarked contributions for these candidates. In addition, there was over $100,000 that was earmarked for the NRSC but distributed by the NRSC to six of the Senate candidates.

Viewed in this context, it is easy to understand why MUR 2282 concerns the integrity of the contribution limitations.

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Through §441a(d) and §441a(h), Congress provided generous allowances for party activity in Senate election races. Yet, Congress did not intend that party expenditures and contributions be open-ended and without limits. Not only do the very terms of these provisions expressly limit expenditures and contributions by party committees, see n.2 and p.2, supra, but the legislative history clearly underscores that intent.

In passing §441a(d), Congress sought to "allow the parties to play a strong role in the electoral process, while at the same time assuring that limitations are placed on their activities." H.R. Rep. No. 93-1239, 93d Cong., 2d Sess. 157 (1974)(supplemental views of Rep. Frenzel). Congressional recognition of the need to place some limitations on party activity is clear from the 1974 FECA legislative history. At one point, the Senate passed an amendment proposed by Senator Brock that would have exempted congressional campaign committees such as the NRSC from the Act's expenditure limits. 120 Cong. Rec. S5189 - S5191 (daily ed. April 3, 1974). The Senate reversed itself, however, five days later. 120 Cong. Rec. S5411 - S5415 (daily ed. April 8, 1974). Successfully urging repeal of the Brock Amendment, Senator Clark noted the "loophole" created by the Brock Amendment and stated, "To permit unlimited expenditures would be a serious mistake." 120 Cong. Rec. S5413, S5414 (daily ed. April 8, 1974)(remarks of Senator Clark).

Similarly, calls for increased party activity were balanced with a recognition that limitations on such activity were needed

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during the passage of §441a(h) in 1976. As originally proposed by Senator Johnston, the provision would have increased to $20,000 the amounts which the Democratic or Republican Senatorial Campaign Committee could contribute to senatorial candidates. Prior to the Johnston Amendment, the senatorial committees were limited to $5,000 per election or a total of $10,000 for both the primary and general elections. Despite criticism that the amendment "carved out" an unnecessary exception for party committees and would "open up the flood gates" of increased election spending, the amendment passed the Senate. See 122 Cong. Rec. S3807-3808 (daily ed. March 18, 1976)(remarks of Senator Clark). At conference, however, the $20,000 figure was trimmed back to the $17,500 figure currently found in §441a(h). H.R. Rep. No. 94-1057, 94th Cong., 2d Sess. 59 (1976).

Applying this legislative history to the facts of this case, we think Congress did not intend to allow NRSC to supplement its §441a(d) and §441a(h) limits by orchestrating approximately $2.3 million in earmarked contributions. We believe that through a series of complex and sophisticated fundraising techniques, the NRSC sought to do indirectly what it could not do directly -- provide a specified amount of contributions for particular candidates. Such fundraising activity plainly circumvents the contribution limitations carefully prescribed by Congress.

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IV.

Consistent with the Commission's prior rulings in this area, we agree with the Commission's General Counsel that the NRSC exercised "direction or control" over the making of $2.3 million dollars in earmarked contributions. Accordingly, we agree with the General Counsel's recommendations to find probable cause to believe that the NRSC violated 2 U.S.C. §434(b) and 11 C.F.R. §110.6(d)(2) by failing to report as contributions from itself approximately $2.3 million in contributions forwarded in 1986 to the authorized committees of twelve Senate candidates.

6-2-89
Date

Danny Lee McDonald
Chairman

6/2/89
Date

John Warren McGarry
Commissioner

6/2/89
Date

Scott E. Thomas
Commissioner

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FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

THE FOLLOWING MATERIAL IS BEING ADDED TO THE

PUBLIC RECORD IN (CLOSED) MUR 2282

2 2 0 4 2 7 6 0 2 2 1

CGC 3681

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(703) 684-1204

P.C. NEW YORK, WASHINGTON, D.C.
CONNECTICUT, VIRGINIA AND
TEXAS ONLY

July 27, 1989

HAND DELIVER

Anne A. Weissenborn, Esquire
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 2282

Dear Ms. Weissenborn:

Enclosed is a check from the National Republican Senatorial Committee in the amount of $3,000. When added to the $2,000 that the Commission has on account from the cashing of the NRSC check previously provided, the Commission will be in possession of the entire $5,000 required under the parties' conciliation agreement.

I look forward to the return of the executed conciliation document.

Sincerely,

Stuart M. Gerson

Stuart M. Gerson

SMG:gj
Enclosure

cc: Hon. Richard A. Snelling
William B. Canfield, Esquire

RECEIVED
FEDERAL ELECTION COMMISSION
89 JUL 31 PM 4:05

CLOSED

MEMORANDUM

06C3601

TO: DEBRA A. TRIMIEW

FROM: CHERYL T WILLIAMS

TO: CHERYL T WILLIAMS

FROM: DEBRA A. TRIMIEW

CHECK NO. 35087 { A COPY OF WHICH IS ATTACHED } RELATING TO

MUR 2282 (Weissenborn) AND NAME National Republican Senatorial Cmte.

WAS RECIEVED ON 7/31/89. PLEASE INDICATE THE ACCOUNT INTO

WHICH IT SHOULD BE DEPOSITED:

/ / BUDGET CLEARING ACCOUNT { 95F3875.16 }

/ ✓ / CIVIL PENALTIES ACCOUNT { 95-1099.160 }

/ / OTHER _____

SIGNATURE Debra A. Trimiew DATE 8/1/89

89 JUL 31 P11 4:05

FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THE FOLLOWING DOCUMENTATION IS ADDED TO

THE PUBLIC RECORD IN CLOSED MUR 2282.

2004081076

FEDERAL ELECTION COMMISSION
WASHINGTON D.C.

MEMORANDUM

TO: Commissioners
General Counsel Noble
Staff Director Surina
Press Officer Elland

FROM: Marjorie W. Emmons/Delores Harris
Commission Secretary

DATE: December 10, 1990

SUBJECT: Statement of Reasons for **MUR 2282** (on remand pursuant to Common Cause v. FEC, Civil Action No. 89-0524(GAG D.D.C. Jan. 24, 1990).

Attached are two copies of the Statement of Reasons for MUR 2282 (on remand pursuant to Common Cause v. FEC, Civil Action No. 89-0524(GAG D.D.C. Jan. 24, 1990) signed by Commissioners Aikens, Elliott, and Josefiak, received in the Commission Secretary's Office on December 10, 1990 at 11:39 a.m.

Attachments (2 copies)

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

M E M O R A N D U M

TO: Office of the Secretary
Federal Election Commission

FROM: Commissioner Joan D. Aikens
Commissioner Lee Ann Elliott
Commissioner Thomas J. Josefiak

DATE: December 10, 1990

SUBJECT: Statement of Reasons
MUR 2282 on remand pursuant to Common Cause v. FEC, Civil Action No. 89-0524(GAG) D.D.C. Jan. 24, 1990)

We request that the attached copies of our Statement of Reasons be placed on the public record in both the files for MUR 2282 and Common Cause v. FEC, Civil Action No. 89-0524(GAG) D.D.C. Jan. 24, 1990).

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	
National Republican Senatorial Committee	MUR 2282 (on remand pursuant to Common Cause v. FEC, Civil Action No. 89-0524(GAG) (D.D.C. Jan. 24, 1990))
James L. Hagen, as treasurer	

Statement of Reasons

COMMISSIONER JOAN D. AIKENS

COMMISSIONER LEE ANN ELLIOTT

COMMISSIONER THOMAS J. JOSEFIAK

On February 8, 1990, the Federal Election Commission failed to approve, by a three-to-three deadlock vote, the recommendation of the Office of General Counsel to appeal the decision of the U.S. District Court in Common Cause v. FEC, Civil Action No. 89-0524 GAG (D.D.C. Jan. 24, 1990). We strongly supported the General Counsel's recommendation to appeal the district court's ruling.

On February 15, 1990, the Commission voted to reopen MUR 2282 for further proceedings in accordance with the court's directives. Pursuant to the court's order, the Commission voted to find probable cause to believe that the National Republican Senatorial Committee and James L. Hagen, as treasurer, violated 2 U.S.C. §434(b) and 11 CFR 110.6(d)(2) by failing to report approximately $2,718,813.60 in contributions to twelve authorized committees of U.S. Senate candidates in 1986 (contributions previously reported as earmarked by the original donors), and that respondents violated 2 U.S.C. §441a(h) by exceeding the $17,500 limitation on party committee contributions to the twelve candidate committees by approximately

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$2,676,916. We also approved a conciliation agreement for submission to the respondents, in conformity with our statutory obligation under 2 U.S.C. §437g(a)(4)(A)(i) to seek settlement of the case through conciliation after making a "probable cause" finding. On August 21, 1990, the Commission voted to file suit against the National Republican Senatorial Committee when probable cause conciliation reached an impasse. [1]

We believe it is our responsibility to explain for the record our actions in this important matter. The record in this case has not previously reflected our rationale for voting to find "probable cause to believe" and for then filing suit against the National Republican Senatorial Committee. In now making our position clear, it is not our intention to reargue the merits of MUR 2282. We continue to stand by our interpretation of "direction or control" under the Commission's regulations at 11 CFR 110.6, and reaffirm our support for the legal analysis presented in Commissioner Josefiak's Statement of Reasons of January 30, 1989. [2]

We admit to having had strong reservations in deciding whether to accept remand of this decision and to attempt to implement Judge Gesell's order. We ultimately decided we were obligated to follow the court's order once the Commission had rejected the opportunity to appeal. It would be indefensible for the agency to both decline

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1. This motion carried on a 5-0 vote (Commissioner Aikens absent).

2. We also continue to stand by the Commission's long-standing position regarding the "earmarking" issue. The conclusion that contributions had been sufficiently earmarked was unanimously accepted by the Commission in MUR 2282, and was the necessary premise for the General Counsel's "direction or control" argument.

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to appeal a court decision and decline to follow it.[3]

We found ourselves compelled to accept remand and make new probable cause findings in compliance with the district court's decision. Because acceptance of the remand required enforcement of the district court's order, the Commission did not rebrief the case for respondents. Instead, we moved directly to offering an appropriate conciliation agreement proposal.

When conciliation negotiations with the NRSC failed, we were forced to decide wnether to litigate the case. We believed it would have been an indefensible exercise of prosecutorial discretion for us to make a finding of "probable cause" that violations of this magnitude had occurred and then to drop the matter, even if such findings were the result of an unappealed court decision that put a gun to our heads. Therefore, on August 21, 1990, the Commission voted to authorize the General Counsel to file a civil suit against the NRSC specifically based on the Probable Cause To Believe Findings made by the Commission on February 15, 1990, which was based upon Judge Gesell's order.

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3. Section 437g(8)(C) of the Act provides:

> In any proceeding under this paragraph the court may declare that the dismissal of the complaint or failure to act is contrary to law, and may direct the Commission to conform with such declaration within 30 days, failing which the complainant may bring, in the name of such complainant, a civil action to remedy the violation involved in the original complaint.

This provision is ambiguous as to the nature of the Commission's obligation to conform to a court's ruling that its dismissal of a complaint was "contrary to law." But the positing of a remedy for the Commission's failure to do so appears to contemplate the Commission declining to act upon a court's instruction.

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We voted to make new findings against the NRSC consistent with the district court's decision and to litigate this case solely because of our obligation to uphold the law. Unfortunately, the law of this case is the unchallenged ruling of Judge Gesell.

The Commission's authority to decide the legal issues within its jurisdiction was taken from it by Judge Gesell's decision. We are now in the remarkable situation, however, where the deference generally afforded the Commission's interpretation of the law may be granted to the FEC in its current litigation against the NRSC, even though no majority of the Commission has ever agreed to the legal interpretation of our regulations upon which the case is based. An imprimatur of agency authority may be wrongly conveyed in the new case brought by the FEC, even though the litigation has resulted from a court decision in which such deference to the Commission was wholly disregarded. [4]

We wish to make clear for the record that we believe the "law" of this case is bad law. We strongly resent the district court's characterization of our votes in the original case as "arbitrary and capricious" or our opinions on the legal issues to be "contrary to law." [5] Unless and until it is reviewed by a higher court, we

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4. In the context of the Commission's dismissal of a complaint, which was the circumstance presented Judge Gesell, the U.S. Supreme Court has held that the Commission "is precisely the type of agency to which deference should presumptively be afforded." FEC v. DSCC, 454 U.S. 27, 37 (1981).

5. Contrary to Judge Gesell's rationale, neither our disagreement with the General Counsel's recommendation regarding "direction or control" nor the Commission's split vote over "probable cause" serve to make our decisions unreasonable or arbitrary. Courts have held that these elements provide an insufficient basis to find the Commission's actions "contrary to law."

consider the district court's decision to now stand as simply the aberrant law of one case, unattached to Commission precedent and decisional authority.

December 10, 1990

JOAN D. AIKENS

LEE ANN ELLIOTT

THOMAS J. JOSEFIAK

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(Footnote 5 continued from previous page)
See DCCC v. FEC, 831 F.2d 1131, 1135 n.5 (D.C. Cir. 1987); Orloski v. FEC, 795 F.2d 156, 161 (D.C. Cir. 1986); DSCC v. FEC, No. 90-1504, slip op. at 7 (D.D.C. Aug. 27, 1990); Stark v.FEC, 683 F. Supp. 836, 841 (D.D.C. 1988).