FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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MEMORANDUM

April 20, 1990

TO: Lawrence M. Noble
General Counsel

FROM: The Commissioners

SUBJECT: Possible Violations of 2 USC 441a(a)(3)

A recent news article (see attached) reported that several individuals have exceeded the $25,000 annual aggregate ceiling for contributions.

If these allegations are substantiated, it appears that the Federal Election Campaign Act may have been violated. Therefore, the Commission requests that the Office of the General Counsel prepare for its consideration, a report regarding these allegations, including a recommendation as to whether or not there is "reason to believe" a violation of the FECA occurred.

Joan D. Aikens,
Commissioner

Lee Ann Elliott,
Commissioner

Thomas J. Josefiak,
Commissioner

Danny Lee McDonald,
Commissioner

John Warren McGarry,
Commissioner

Scott E. Thomas,
Commissioner

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

April 20, 1990

TO: Larry Noble
General Counsel

FROM: John Surina
Staff Director

SUBJECT: Los Angeles Times Article re: 2 USC 441a(a)(3)

Attached are some computer listings that may prove useful in your analysis of the Commission's request that you preliminarily look at the allegations contained in the subject article. Kent Cooper ran these listings in anticipation of outside demand after he learned of the thrust of this article. Unlike the thorough analysis he witnessed by the Times staff, Kent purposefully used the most general search criteria possible; specifically, the correct spelling of the last name of the individual concerned.

He did not narrow the search by specifying any of the additional attributes we try to capture on individual contributors such as address, employer, occupation, etc. Doing so would be reliable only if these items were completely, consistently and accurately reported by the contributor to the recipient committee, then by the committee to the FEC, and then entered with the same completeness and accuracy into the computer. There are simply too many blank, inconsistent, or inaccurate entries to rely upon the computer system absent considerable manual follow-up.

Kent also notes that he did not broaden the search criteria to seek out last names that may merely sound like the last name of the individual at question. In at least one instance, the Times researchers did find one of the individuals they were researching by criteria other than last name where the last name was misspelled.

Notwithstanding all the above noted shortcomings, the listings are herewith provided for such use as you see fit.

Attachment

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Press Office

FEC - Press Office

COLUMN ONE

Campaign Gifts Flow From Rich

Donations to candidates are once again unrestrained and virtually unenforced. Some of the heaviest spenders are over their legal limit.

By SARA FRITZ and DWIGHT MORRIS
TIMES STAFF WRITERS

WASHINGTON—Over the past three years, as Congress debated legislation to limit hostile business takeovers, Texas corporate takeover specialist Harold C. Simmons and his family pumped more than $250,000 into the campaign coffers of key federal office-seekers. In the process, Simmons' contributions more than doubled the legal limit on political giving by the very rich.

Simmons made more than $120,000 in personal contributions to President Bush and members of Congress who were in a position to influence legislation governing corporate takeovers.

He gave $69,958 just to candidates seeking election in 1988, more than double the $25,000 limit. His relatives, after consulting with Simmons, gave to a similar list of candidates for public office after consulting with Simmons.

At the same time, Simmons proved an effective force in Congress. Campaign contributions and tireless lobbying by Simmons and others of the nation's biggest corporate raiders, according to congressional sources, have played a big role in blocking legislation that would have severely restricted leveraged buyouts and other hostile takeovers.

While Simmons is a leader among wealthy patrons of the American political system, he is certainly not the only millionaire who exceeded civil limits established by a Watergate-era law designed to prevent the rich from exerting undue influence on the political system.

A Times study, which used computer searches of federal election reports to focus on the political giving habits of more than 100 of the nation's wealthiest and most influential citizens, found that at least nine others also exceeded the legal limit during the 1988 election campaign.

The nine others were corporate buyout specialists Ronald O. Perelman, Meshulam Riklis and Henry Kravis, Kravis' brother, Raymond, Riklis' son, Ira, Manhattan developer Donald Trump, grain trader Dwayne O. Andreas, and his wife, Dorothy Inez, and Caroline Rose Hunt, daughter of the late Texas oilman H.L. Hunt.

Kravis, like Simmons, exceeded the limit by more than 100%, according to federal records.

When contacted by The Times, spokesmen for each of these rich contributors acknowledged the accuracy of the records.

"I can't make the problem go away," said John Garvett, Simmons' lawyer, after reviewing his client's canceled checks and contribution records.

Spokesmen for most of the other nine donors asserted that their violations were inadvertent. A few pointed out that they had exceeded the limit only by a few hundred or a few thousand dollars.

These heavy contributors are the sorts of people who have important business and financial interests affected by decisions made in Washington by officials they help to elect. So enormous have such contributions become that many of the congressional recipients of the largess are beginning to worry about the consequences and to agitate for reform.

"There is too much money in politics; there is too much special-interest influence," declared Sen. David L. Boren (D-Okla.), who himself has received thousands of dollars from these contributors and is leading the drive for reform. "It's an open invitation to corruption."

Ironically, the records suggest, wealthy individuals are giving even more money to presidential and congressional candidates than they did two decades ago when Congress enacted a law intended to restrain political contributions by the very rich.

Example of Donations

The Bass family of Ft. Worth, for example, distributed close to $700,000 to a variety of candidates for federal office over the past three years—most of them defenders of Texas oil interests. Many others doled out contributions of as much as $100,000 to a single presidential candidate.

The Times review of federal and state campaign records shows that political giving by the rich is now largely unrestrained.

Even many of those who technically abide by the $25,000 limit seem to have found other ways to channel additional money to candidates. Some have relatives who contribute to a similar collection of candidates. Some make so-called "soft money"—contributions to presidential and congressional candidates that are not limited by law because they are forwarded to state political parties for party-building activities.

Among the givers who used one or both of these entirely legal techniques for giving more than $25,000 were the Bass family; Hollywood executive Lew R. Wasserman; Disney executives Michael D. Eisner, Frank G. Wells and Jeffrey Katzenberg; Chicago industrialist Lester Crown, and several descendants of the late Texas oilman, H.L. Hunt.

Although Wasserman and the Bass family have been fined in the past by the Federal Election Commission for their unrestrained giving to political candidates, FEC officials acknowledge that they do not adequately monitor compliance with the limits on individual donations. A search through federal records showed no penalties exceeding $250.

Fred Wertheimer, president of Common Cause, the self-styled citizens' lobby, said the information uncovered by The Times' study of campaign giving "means that the laws on the books intended to prevent wealthy contributors from using large amounts of money to potentially influence government are being ignored."

The FEC's failure to enforce the laws governing donations by individual contributors demonstrates the need for a massive overhaul of federal election laws, which is currently being considered in Congress, according to Wertheimer. He said the FEC does not monitor compliance with the $25,000 limit, and also has failed to write regulations that would restrict soft-money contributions.

"If we had effective enforcement of the law today, the soft-money contributions would not be taking place and contributions over the aggregate limit would not be occurring," he said. "Since the FEC is not doing its job, Congress must again act to make sure the law means what it says."

Nixon Contributions

The current law, enacted in 1974, was intended to prevent the kinds of activities that occurred during the 1972 presidential campaign of Richard M. Nixon. According to public records, Nixon's aides collected contributions of $1 million or more from such rich industrialists as W. Clement Stone of Chicago, Max H. Fisher of Detroit and Richard M. Scaife of Pittsburgh.

Ex. A1 the time, these contributions were legal.

Under the law, contributors are permitted to give up to $2,000 to a congressional campaign, $5,000 a year to a political action committee and $20,000 a year to a party committee. Total contributions for a single year (donations in 1989 to a candidate running in 1990 count toward the 1990 limit) may not exceed $25,000.

Although the FEC has "no legal authority to fine anyone," according to FEC spokesman Scott Mosley, it can try to negotiate civil fines of up to $5,000 for unwitting violations and $10,000 for willful violations, but federal records showed no penalties approaching more than a fraction of those limits.

In violations deemed to be "substantial and willful," Mosley said, the FEC could refer cases to the Justice Department for criminal prosecution, and the penalties could range up to $25,000 and one year in jail.

In the 16 years since the law was passed, however, party leaders, candidates and their rich contributors have found numerous ways to circumvent those restrictions. The result is a system in which, as Wertheimer put it, "Watergate-size and Watergate-style campaign money are once again a major force in federal elections."

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Anita Dunn, communications director for the Democratic Senatorial Campaign Committee, said some contributors may actually be unaware of the $25,000 limit because the candidates, PACs and parties are not bound by law to remind them about it. "There's no rule that you have to inform people what the federal aggregate limit is," she said.

The giving habits of Simmons, Kravis and Perelman vividly illustrate how some very rich people are eager to fill the campaign coffers of influential candidates—especially when their business interests appear to be threatened by government action.

Those three men had a great deal at stake in 1988 and 1989, when Congress considered legislation that would have made it easier for corporate managers to fend off hostile takeovers. George Bush, first as a candidate and then as President, hinted that he might support legislation to toughen the tax treatment of corporate debt, which is a vital component of most hostile takeovers.

But both Bush and Congress eventually backed down.

Some members of Congress insist that individual contributions are so small when measured against their total fund-raising needs that they have little influence. "I really do not believe that senators are going to be bought for a $1,000 contribution or for a $5,000 contribution," said Sen. John C. Danforth (R-Mo.).

But economist Robert Reich of Harvard, among others who closely observed the process, says campaign contributions from corporate raiders were directly responsible for dissuading Congress and the President from taking any action against corporate takeovers.

"Wall Street has been pouring money onto Capitol Hill and both Democrats and Republicans have developed a strong thirst for it," he said. "All of this is manifest in Wall Street's extraordinary power and the resolute timidity of Congress in the face of that power."

Over the past three years, the Simmons, Kravis and Perelman families each made more than $200,000 in political contributions, most of them to Bush and members of Congress who were in a position to play a key role in killing any corporate takeover legislation.

In the House, Simmons gave contributions of between $500 and $1,000 to the men with the most control over such legislation: John D. Dingell (D-Mich.), chairman of the Energy and Commerce Committee, Edward J. Markey (D-Mass.), chairman of the subcommittee with direct responsibility for financial markets, and three other members of the committee—Mike Synar (D-Okla.), John Bryant (D-Tex.) and Joe L. Barton (R-Tex.).

While Markey's subcommittee held extensive hearings on the corporate buyout issue during 1989, it did not draft legislation.

In the Senate, Simmons and Kravis gave contributions of $1,000 to $2,000 to many members of the Banking and Finance Committees, which have jurisdiction over corporate finance. Finance Chairman Lloyd Bentsen (D-Tex.) received $5,000 from the Simmons family and $2,000 from Kravis for his 1988 ...ection campaign. After publicly criticizing the takeovers, Bentsen announced in March, 1989, ... pass it could propose no le...

Two year before, the ... Committee sent to the Senate ... a bill designed to curb corporate takeovers. But Sen. William Proxmire (D-Wis.), then the committee's chairman, abruptly pulled the bill from the floor after the Senate voted 57 to 40 in favor of an amendment that would have curbed the use of so-called "poison pills" by managers to avert outside takeovers.

That pro-takeover amendment effectively killed the bill, and 21 of the 26 senators who had received campaign contributions from Simmons, Kravis or Perelman over the past three years voted in favor of it. Only five—John Heinz (R-Pa.), Albert Gore Jr. (D-Tenn.), Donald W. Riegel Jr. (D-Mich.), Daniel Patrick Moynihan (D-N.Y.) and Paul Simon (D-Ill.)—voted to protect poison pills.

While contributing these large sums of money, Kravis, by his own account, also privately lobbied about 50 members of the House Ways and Means and Senate Finance Committees, arguing that corporate takeovers generally are good for the nation's competitiveness. One House member who met with him twice recalled that Kravis was "very persuasive."

Unlike Kravis, Simmons seldom if ever does any personal lobbying in Washington. Despite his wealth and phenomenal success, he remains a shy, unassuming personality.

A poor boy from rural Texas, Simmons, now 58, began his business career with an investment of $5,000 and built a successful drug store chain that he sold to the Eckard drug store chain. Then, through a series of corporate takeovers, he amassed a financial empire currently valued at nearly $2 billion. He recently lost a battle for control of Lockheed Corp.

Although FEC records show that Simmons contributed more than twice the $25,000 limit to candidates in 1988, his lawyers assert that $7,000 of those contributions were actually intended to be donated by his wife, Annette, but she did not sign the check.

The lawyers acknowledged that the FEC records are otherwise accurate. And even by their own accounting, Simmons was $27,958 over the annual limit for political giving set by federal law.

A lawyer representing Simmons said the couple wrongly believed they would not run afoul of the law if they kept their combined donations under $50,000. "That may not be the law, but that's the way he does it," Simmons' lawyer said. He did not explain how Simmons and his wife failed to abide by their self-imposed $50,000 ceiling.

In addition to Simmons' $50,958 in contributions, federal records show that his wife contributed $10,750, his two brothers and sister-in-law gave $15,175 and his four daughters—three of them still college students—kicked in anoth-

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Continued from A18

er $51,500. That brought the family's total contribution to more than $137,000.

Like most rich families that make substantial political contributions, all members of the Simmons clan gave money to a similar list of candidates. Critics of the current system view this pattern as evidence that individuals such as Simmons are actually responsible for all the donations. Indeed, according to party officials, the candidates who receive the money assume it is all coming from one source.

The parallel contributions of Simmons and his family members are particularly clear in the case of his three college-student daughters. In 1987, for example, Schuyler Simmons gave $5,000 to the PAC of one of her father's corporations, Conoco, and another $5,000 to the PAC of the Chicago-based law firm that does business for her father, Kirkland Ellis. Simmons' lawyer acknowledged that Simmons and his wife and daughters discussed their contributions before making them.

While Simmons shuns lobbying, Kravis and Perelman are well known in political circles, and both clearly enjoy rubbing elbows with Washington's power elite. Perelman's national reputation soared in 1986 when he acquired Revlon for $3 billion, but Kravis is best known for the biggest takeover in history, the $25-billion leveraged buyout of RJR Nabisco Inc. in 1988.

Records show that Kravis, 45, contributed $56,711 directly to federal candidates and political action committees in 1988, or more than twice the legal limit. His brother, Raymond, an internationally recognized oil and gas consultant, exceeded it by giving $34,500. His wife, fashion designer Carolyne Roehm, contributed another $2,711. Like the Simmons family, the different members of the Kravis clan gave mostly to the same candidates.

A spokesman for Kravis declined to comment on the FEC records of his contributions.

Kravis also made a so-called "soft money" contribution of $100,000 to Team 100, a program run out of Republican National Committee headquarters in 1988 by Bush's chief fund-raiser, Robert A. Mosbacher, now secretary of commerce.

Although the money was raised by Bush's presidential campaign, it was not subject to federal limitations because it technically was spent on the state level by the Republican Party for such things as voter registration and get-out-the-vote drives.

It is estimated that Bush and his Democratic opponent, Michael S. Dukakis, used this loophole in federal election laws to raise about $50 million between them in soft money in 1988. The money is used to supplement the $92.5 million in public funds received by presidential candidates.

While Simmons and Kravis favored Republican candidates, Perelman, 46, whose personal wealth is estimated at $2.75 billion, showed little or no party favoritism in his giving during the last election campaign. His soft-money contributions were evenhanded—$100,000 to the Republicans' Team

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100 and $100,000 to a similar fund created by Democratic front-runner Robert Farmer for Dukakis.

According to FEC records, Perelmans also gave a total of $90,000 in contributions that were subject to federal law, or more than $5,000 over the legal limit. Those included $1,000 each to Democratic presidential hopefuls Dukakis, Joseph R. Biden Jr., Gary Hart, Richard A. Gephardt and Gore, and $500 each to GOP presidential hopefuls Bush and Bob Dole.

A spokesman for Perelman, James Conroy, acknowledged that his boss in 1988 may have slightly exceeded the limit on contributions subject to federal law. But he argued that $5,000 of Perelman's $80,500 in donations reported to the FEC should not be subject to federal law because it was given to the Presidential Trust, a Republican Party fund, which Perelman mistakenly thought was a soft-money account.

Associated Press

Buyout specialist Ronald O. Perelman gave $100,000 soft-money contributions each to Republican and Democratic groups.

Another corporate raider, Rikita, 77, the Beverly Hills billionaire who owns the retail conglomerate Rapid-American and has been in the business of buying out corporations much longer than Simmons, Kravis and Perelman, also exceeded the limit on political giving by $1,000 in 1988, according to FEC records. Rikita' wife, singer Pia Zadora, gave $20,000, and his son, Ira, contributed $20,500, more than the law allows, to a list of candidates that was similar but not identical.

Attorney Arnold Brozer said the elder Rikita was under the mistaken impression the law would allow him to credit a $1,000 contribution to Biden's 1988 presidential campaign to 1987, since that was the year Biden dropped out of the race. He said Ira assumed that one of his federal contributions—he could not remember to whom—was a soft-money gift outside the purview of federal law.

"It was believed by [redacted] and Mesbadora [at the time they contributed the money] that they were not violating the law," Brozer said.

Breaks Pattern

The political giving of the Rikita family does not fit the pattern established by other corporate raiders. None of the candidates funded by Rikita are members of committees with direct jurisdiction over legislation affecting corporate takeovers or the varied business interests of his vast financial empire.

The favorite candidate of the Rikita family was Biden, the Delaware Democrat who is chairman of the Senate Judiciary Committee. He received $13,000 in campaign contributions from the Rikita family during the past three years for his Senate and presidential campaigns.

Friends say Rikita' son, Ira, is primarily responsible for these contributions. While a student at Wharton Business School, Ira met with Biden, decided he liked the Delaware senator's policies and persuaded his whole family to contribute.

It is not just the corporate raiders who have exceeded the limit on campaign contributions. The list includes men and women with other interests in Washington as well.

In supermarket tabloids, Donald Trump is known primarily for his stormy divorce battle with his wife, Ivana. In New York City, he is known as the owner of Trump Tower and the Trump Shuttle. But among many candidates for high office, it seems, he is known as a soft touch.

Federal records show that Trump made $42,300 in contributions subject to federal law during 1988 and exceeded the federal limit by $17,300. He also gave $100,000 in soft-money to Team 100, and his family members kicked in another $13,500 in contributions to various candidates.

Trump's beneficiaries range across the ideological spectrum from liberal Rep. Ted Weiss (D-N.Y.) to conservative Rep. Jim Courter (R-N.J.). Sources within the Republican and Democratic Parties say Trump appears to contribute money to politicians primarily because it gives him an opportunity to socialize with the nation's leaders.

Anthony Glodeman, an executive vice president of the Trump Organization, said that when his boss learned a year ago that he had exceeded the $25,000 limit in 1988, he quickly asked for refunds. But Glodeman knew of no refunds received by Trump, and none of the recipients have reported any refunds to the FEC, as required under federal law.

Andreas, chairman of Archer Daniels Midland Co., one of the largest grain trading firms in the world, has long been an acknowledged leader in the art of influencing government officials. He has been friends with every President since Harry S. Truman and currently makes frequent trips to Moscow in his corporate jet for private meetings with Soviet President Mikhail S. Gorbachev.

The grain industry enjoys government subsidies at every level of production and distribution—all of them regulated by Congress and the Administration in close consultation with the big agricultural leaders such as Andreas. Archer Daniels Midland owes much of its overseas sales to U.S. grain export subsidies.

Find Check

Two decades ago, Andreas played an unwitting role in the development of the legislation that he now appears to be violating. The law was written after Watergate investigators discovered that a $25,000 check written by Andreas to the 1972 campaign of President Nixon had found its way into a blind bank account of Bernard L. Barker, one of those arrested in the Watergate break-in.

That embarrassing disclosure did nothing to dampen Andreas' eagerness to contribute money to the American electoral system. To this day, he remains a stalwart financial backer of the Republican Party and a contributor to many Democratic candidates as well. In fact, Andreas, a regular churchgoer, has said he views political giving as an obligation similar to his commitment to contribute to his church.

In 1988, according to FEC records, Andreas made $28,000 in political contributions that are subject to federal law—or $3,000 more than the limit. Claudia Balding, a spokeswoman, said Andreas inadvertently violated the limit because he did not understand that

KENNY SCHAEFER / For The Times

Developer Donald Trump, known to some as a soft touch, made $42,300 in contributions subject to federal restrictions in 1988.

contributions to candidates in a non-election year are attributed to the year in which the candidate stands for election.

'Laws on the books intended to prevent wealthy contributors from using large amounts of money to potentially influence government are being ignored.'

FRED WERTHEIMER
Common Cause president

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CAMPAIGN: Some Wealthy Givers Circumventing Legal Limits

CAMPAIGN CONTRIBUTIONS OF THE SIMMONS CLAN

Harold C. Simmons
Source: Federal Election Commission

Contributions of the family of Texas corporate takeover specialist Harold C. Simmons to federal candidates

	1987	1989	1990
Harold C.	$24,600	$58,958	$22,250
Annette (wife)		10,750	5,000
Andrea (daughter)	5,000	10,000	
Lisa (daughter)	10,000	14,000	5,000
Scheryle (daughter)	10,000	17,000	
Serena (daughter)		4,000	5,000
Douglas (brother)		4,800	
G. Reuben (brother)		8,375	
Mrs. G. Reuben		2,000	
Total	$49,600	$135,883	$37,250

[illegible] Andrews] with [illegible] gave at least $37,000—a [illegible] $5,000 to a similar bill [illegible] Andrews controlled as a result of $96,000 to a similar bill of candidates.

The Andrews family list of favored clients is replete with members of Congress who have a role in making tax and spending policy governing oil and natural gas. Among those who gave a $100,000 contribution to Texas 100, the [illegible] committee of Chairman [illegible] (D-Tex.), Administration [illegible] Committee [illegible] (D-Calif.) and [illegible] Committee [illegible] (D-Tex.). Another who gave a $100,000 contribution to Texas 100, the [illegible] committee of Chairman [illegible] (D-Tex.), Administration [illegible] Committee [illegible] (D-Calif.) and [illegible] Committee [illegible] (D-Tex.).

The Simmons family of Texas gave $149,600 in 1987 through 1989 to a list of candidates dominated by Texas advocates of the oil industry. The leading contributors in the Simmons family were Caroline Simmons, 77, who gave $25,100 in 1988—$700 over the limit—and her half-brother Ray, 67, who contributed $17,000 plus $10,000 in soft money.

Jim Chamberlain, a spokesman for Caroline Rose Hunt, who runs a [illegible] her that the donations [illegible] such as [illegible] Democratic President [illegible] Dallas Cowboys Friends [illegible] are motivated [illegible] they are motivated [illegible] political giving within [illegible] letter of the law. In fact, Wolfe and other Dallas executives are a [illegible] program designed [illegible] by their lawyers to keep them from violating the law.

Family Donations

Federal and state records show that Wolfe, 58, and his wife, Lennon, gave at least $118,500 to candidates and political organizations over the last three years, including $60,000 in soft-money contributions to the Democratic Party and a $5,000 donation last year to the California Democratic Central Committee.

Like other Disney executives, Wolfe favors candidates supported by the Motion Picture Assn. of America. Then-MPAA Rep. Jack Brooks (D-Tex.), whose subcommittee on economic and commercial law has jurisdiction over many film industry issues, and California Democrats such as Reps. Howard L. Berman of Pacoima Chitz, Hollywood A. Waxman of Los Angeles and Anthony C. Beilenson of Los Angeles.

The Disney group also gave generously to the campaign of Sen. Bill Bradley (D-N.J.), but that was a different matter. Although Bradley serves on the tax-writing Senate Finance Committee, he is not up for reelection this year. Wolfe's interest in Bradley was sent to Hunt advising [illegible] of push hotels, said her $100,000 contribution to the GOP Presidential Trust was a soft-money donation not subject to federal law. But Republican spokeswoman Leslie Goodfellow said all contributions to the Presidential Trust are subject to federal law. She added that party records show that a letter was sent to Hunt advising [illegible]

Gives to Texans

The Bass family, whose wealth was derived originally from Texas oil, have contributed primarily to Texas politicians such as Democrat Jim Chapman, Reps. Martin Frost and Jim Wright and former Republican Rep. Phil Gramm and Reps. Joe L. Barton, Dick Armey and Lamar Smith. They have also contributed to the oil industry.

Although most rich contributors tended their retirement giving to individual of their own, Lester Crown, 64, whose $1-billion fortune is General Dynamics, mostly allocates his contributions with family members.

The Crown family contributed more than $364,000 over the past three years to a long list of House and Senate members whose committee assignments give them jurisdiction over arms sales, such as House Armed Services Committee Chairman Les Aspin (D-Wis.). Among other things, General Dynamics builds submarines for the U.S. Navy and many foreign governments.

A Crown spokesman explained that many contributions attributed to Lester in federal records were actually made by his 36-year-old brother, Henry. The dad gave the money," explained an aide, "but his brother was just available that day, so Lester signed his dad's check."

---> NAME

NOW SORTING AND PREPARING REPORT

FEDERAL ELECTION COMMISSION

DATE 16APR90

1989-90

PAGE 1

INDIVIDUAL CONTRIBUTOR--DATABASE REPORT

CONTRIBUTOR/LENDER/TRANSFERRER REPORTING ENTITY MICROFILM LOCATION TRANSACTION TYPE	STREET ADDRESS	CITY	STATE ZIP TYPE OF FILER REPORT TYPE DATE	ELECTION	AMOUNT
SIMMONS, ANNETTE PEOPLE FOR BOSCHWITZ 1990 89SEN/008/1780 #162016 CONTRIBUTION		DALLAS	TX 75240 SENATE MID-YEAR REPORT 26APR89	PRIMARY	1,000
SIMMONS, ANNETTE CONTRAN CORPORATION POLITICAL ACTION COMMITTEE (CONPAC) 90FEC/622/1278 #212782 CONTRIBUTION		DALLAS HOUSEWIFE	TX 75225 NON-PARTY QUALIFIED YEAR-END 14NOV89	PRIMARY	5,000
SIMMONS, ANNETTE U S FEDERATION OF SMALL BUSINESSES PAC (SMALL BIZ PAC) 90FEC/623/0487 #264925 CONTRIBUTION		DALLAS HOUSEWIFE	TX 75225 NON-PARTY QUALIFIED YEAR-END 17NOV89	PRIMARY	5,000
SIMMONS, ANNETTE BOB SMITH FOR U S SENATE 90SEN/001/4379 #269489 CONTRIBUTION		DALLAS HOUSEWIFE	TX 75240 SENATE YEAR-END 8DEC89	PRIMARY	1,000
SIMMONS, ANNETTE MRS HANK BROWN FOR U S SENATE 90SEN/001/3661 #308608 CONTRIBUTION		DALLAS HOMEMAKER	TX 75240 SENATE YEAR-END 9OCT89	PRIMARY	1,000
SIMMONS, ASA B MR DNC SERVICES CORPORATION/DEMOCRATIC NATIONAL COMMITTEE 90FEC/629/1578 #280109 CONTRIBUTION		NEWPORT	RI 02840 PARTY QUALIFIED FEBRUARY MONTHLY 16JAN90	PRIMARY	250
SIMMONS, BARBARA A BROOKLYN DEMOCRATS FEDERAL CAMPAIGN ACCOUNT; THE 89FEC/602/1861 #058490 CONTRIBUTION		BROOKLYN THE CARROL SCHOOL	NY 11235 NON-PARTY QUALIFIED MID-YEAR REPORT 17MAY89	PRIMARY	250
SIMMONS, BARBARA L CALIFORNIA REAL ESTATE POLITICAL ACTION COMMITTEE/FEDERAL (CREPAC/FEDERAL) AKA "99 CLUB" 89FEC/606/2824 #124827 CONTRIBUTION		THOUSAND OAKS REALTY WORLD EQUITY CENTER	CA 91362 NON-PARTY QUALIFIED MID-YEAR REPORT 5JUN89	PRIMARY	468
SIMMONS, BENAJAMIN L FRED LOCKWOOD FOR CONGRESS 90HSE/390/1783 #246120 CONTRIBUTION		LINCOLN TOUCHE ROSS & CO	NE 68502 HOUSE YEAR-END 11OCT89	PRIMARY	200
SIMMONS, BERNARD LARRY SMITH FOR CONGRESS (90) 90HSE/389/1390 #271139 CONTRIBUTION		HOLLYWOOD PHYSICIAN	FL 33019 HOUSE YEAR-END 6SEP89	PRIMARY	500
SIMMONS, CHARLES A MR SENATOR LLOYD BENTSEN ELECTION COMMITTEE 90SEN/005/2279 #266822 CONTRIBUTION		SCARSDALE DON LOHNES ET AL	NY 10583 SENATE YEAR-END 4AUG89	PRIMARY	350
SIMMONS, CHARLES E MR FRIENDS OF PHIL GRAMM A/K/A THE TEXAS PRESIDENTIAL GALA 90SEN/004/0703 #304147 CONTRIBUTION		HOUSTON	TX 77001 SENATE YEAR-END 12DEC89	PRIMARY	1,000

CONTRIBUTOR/LENDER/TRANSFERRER REPORTING ENTITY MICROFILM LOCATION TRANSACTION TYPE	STREET ADDRESS	CITY	STATE ZIP TYPE OF FILER REPORT TYPE DATE	ELECTION	AMOUNT
SIMMONS, CHARLES E MR FRIENDS OF PHIL GRAMM A/K/A THE TEXAS PRESIDENTIAL GALA 90SEN/004/0704 #304148 CONTRIBUTION		HOUSTON	TX 77001 SENATE YEAR-END 12DEC89	GENERAL	1,000
SIMMONS, CHARLES M DR BOB LANIER FOR CONGRESS 89HSE/384/3152 #141468 CONTRIBUTION		FT WORTH	TX 76107 HOUSE PRE-RUN-OFF 2AUG89	SPECIAL	200
SIMMONS, CHARLES M DR BOB LANIER FOR CONGRESS 89HSE/385/1760 #171951 CONTRIBUTION		FORT WORTH	TX 76107 HOUSE POST-RUN-OFF 29AUG89	RUNOFF	200
SIMMONS, CHARLES M MR NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS * 90SEN/002/3187 #277423 CONTRIBUTION	SR VICE PRESIDENT	FORT WORTH	TX 76101 PARTY QUALIFIED YEAR-END 25SEP89	PRIMARY	9,000
SIMMONS, CHARLES M MR FRIENDS OF PHIL GRAMM A/K/A THE TEXAS PRESIDENTIAL GALA 90SEN/006/1537 #297379 CONTRIBUTION		FORT WORTH	TX 76107 SENATE PRE-PRIMARY 16FEB90	GENERAL	350
SIMMONS, CHARLES M MR FRIENDS OF PHIL GRAMM A/K/A THE TEXAS PRESIDENTIAL GALA 90SEN/004/0359 #301882 CONTRIBUTION		FORT WORTH	TX 76107 SENATE YEAR-END 30NOV89	PRIMARY	350
SIMMONS, CHARLES M MR FRIENDS OF PHIL GRAMM A/K/A THE TEXAS PRESIDENTIAL GALA 90SEN/004/0359 #301883 CONTRIBUTION		FORT WORTH	TX 76107 SENATE YEAR-END 30NOV89	GENERAL	650
SIMMONS, CHRISTINE A MRS NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS * 89SEN/006/2591 #108152 CONTRIBUTION	HOMEMAKER	ATLANTA	GA 30327 PARTY QUALIFIED MID-YEAR REPORT 9JAN89	PRIMARY	1,000
SIMMONS, CHRISTINE A MRS NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS * 89SEN/006/2591 #108153 CONTRIBUTION	HOMEMAKER	ATLANTA	GA 30327 PARTY QUALIFIED MID-YEAR REPORT 7APR89	PRIMARY	250
SIMMONS, CHRISTINE A MRS NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS * 89SEN/006/2591 #108154 CONTRIBUTION	HOMEMAKER	ATLANTA	GA 30327 PARTY QUALIFIED MID-YEAR REPORT 8MAY89	PRIMARY	210
SIMMONS, CLYDE MRS NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS * 89SEN/006/2591 #108155 CONTRIBUTION		BARTOW	FL 33830 PARTY QUALIFIED MID-YEAR REPORT 15JUN89	PRIMARY	240
SIMMONS, DANIEL L DAN MICA FOR SENATE 90SEN/005/0956 #279383 CONTRIBUTION REF TO INDIVIDUAL		CLEARWATER	FL 33515 SENATE YEAR-END 26JUL89	PRIMARY	1,000-

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SIMMONS, DANIEL L MR TOM ANDERSON FOR CONGRESS 89HSE/385/0788 #168001 CONTRIBUTION		CLEARWATER	FL 34630	HOUSE PRE-RUN-OFF 15SEP89	SPECIAL	1,000
SIMMONS, DAVID H FRIENDS OF CONNIE MACK 89SEN/007/1884 #152331 CONTRIBUTION		ORLANDO DRAGE SIMMONS ET AL	FL 32802	SENATE MID-YEAR REPORT 6MAR89	PRIMARY	1,000
SIMMONS, DAVID H FRIENDS OF CONNIE MACK 90SEN/005/3542 #243440 CONTRIBUTION		ORLANDO DRAGE SIMMONS ET AL	FL 32802	SENATE YEAR-END 28AUG89	GENERAL	330
SIMMONS, DAVID L DELOITTE & TOUCHE FEDERAL POLITICAL ACTION COMMITTEE (AKA-TOUCHE ROSS PARTNERS FED PAC) 89FEC/585/2499 #002227 CONTRIBUTION		FARMINGTON HILLS PARTNER TOUCHE ROSS & CO	MI 48018	NON-PARTY QUALIFIED FEBRUARY MONTHLY 12JAN89	PRIMARY	200
SIMMONS, DAVID L MR DELOITTE & TOUCHE FEDERAL POLITICAL ACTION COMMITTEE (AKA-TOUCHE ROSS PARTNERS FED PAC) 89FEC/585/2499 #000962 CONTRIBUTION		FARMINGTON HILLS PARTNER TOUCHE ROSS & CO	MI 48018	NON-PARTY QUALIFIED FEBRUARY MONTHLY 12JAN89	PRIMARY	200
SIMMONS, DEE BOB SMITH FOR U S SENATE 90SEN/001/4380 #269494 CONTRIBUTION		HOUSEWIFE		SENATE YEAR-END 8DEC89	PRIMARY	1,000
SIMMONS, DENNIS E DISTRICT 2 MARINE ENGINEERS BENEFICIAL ASSN-ASSOCIATED MARITIME OFFICERS, AFL-CIO, PAF 89FEC/607/4565 #139760 CONTRIBUTION		ROCKLAND MERCHANT MARINE OFFICER	ME 04841	NON-PARTY QUALIFIED AUGUST MONTHLY 21JUL89	PRIMARY	200
SIMMONS, DONALD G MR OHIO REPUBLICAN PARTY'S FEDERAL CANDIDATES CAMPAIGN COMMITTEE 90FEC/626/1730 #222727 CONTRIBUTION		SHARON CENTER SIMMONS BROS CORP	OH 44274	PARTY QUALIFIED YEAR-END 10OCT89	PRIMARY	500
SIMMONS, DONALD M MR OKLAHOMANS FOR BOREN 89SEN/007/1718 #117990 CONTRIBUTION		MUSKOGEE PETROLEUM CONSULTANT	OK 74401	SENATE MID-YEAR REPORT 25MAY89	PRIMARY	500
SIMMONS, DONALD M MR OKLAHOMANS FOR BOREN 89SEN/007/1718 #117991 CONTRIBUTION		MUSKOGEE PETROLEUM CONSULTANT	OK 74401	SENATE MID-YEAR REPORT 25MAY89	GENERAL	500
SIMMONS, DONALD M SR MR NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS * 89SEN/006/2592 #108159 CONTRIBUTION		SAYRE MANUFACTURER INTIMATE A	PA 18840	PARTY QUALIFIED MID-YEAR REPORT 17JAN89	PRIMARY	800
SIMMONS, DONALD M SR MR NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS * 90SEN/002/3187 #277427 CONTRIBUTION		SAYRE MANUFACTURER INTIMATE A	PA 18840	PARTY QUALIFIED YEAR-END 28NOV89	PRIMARY	250

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SIMMONS, DONALD MR TOM ANDERSON FOR CONGRESS 89HSE/385/5077 #189084 CONTRIBUTION		GULFPORT CHRIS BEAUTY COLLEGE	MS 39501	HOUSE POST-RUN-OFF 11OCT89	RUNOFF	500
SIMMONS, DONALD O MRS TOM ANDERSON FOR CONGRESS 89HSE/385/0787 #167994 CONTRIBUTION		GULFPORT CHRIS' BEAUTY COLLEGE	MS 39501	HOUSE PRE-RUN-OFF 14SEP89	SPECIAL	500
SIMMONS, DONALD P BILL GRANT CAMPAIGN FUND 90HSE/390/2550 #257779 CONTRIBUTION		PANAMA CITY REAL ESTATE AGENT	FL 32405	HOUSE YEAR-END 20DEC89	PRIMARY	1,000
SIMMONS, DOROTHY PEOPLE FOR JOHN HEINZ COMMITTEE 90SEN/001/3293 #250454 CONTRIBUTION		SEWICKLEY HOUSEWIFE	PA 15143	SENATE YEAR-END 14NOV89	PRIMARY	500
SIMMONS, EILEEN CHRISTOPHER SHAYS FOR CONGRESS COMMITTEE 90HSE/391/3660 #248364 CONTRIBUTION REF TO INDIVIDUAL		GREENWICH	CT 06830	HOUSE YEAR-END 22NOV89	PRIMARY	150-
SIMMONS, ELLEN CHET EDWARDS FOR CONGRESS 90HSE/392/1307 #295873 CONTRIBUTION		HOUSTON HOMEMAKER	TX 77002	HOUSE PRE-PRIMARY 2FEB90	PRIMARY	1,000
SIMMONS, F W BROWN & WILLIAMSON TOBACCO CORPORATION EMPLOYEE POLITICAL ACTION COMMITTEE AKA EMPAC 90FEC/619/4155 #194720 CONTRIBUTION		MACON BROWN & WILLIAMSON	GA 31211	NON-PARTY QUALIFIED YEAR-END 15OCT89	PRIMARY	300
SIMMONS, FELIX AUTO DEALERS AND DRIVER FOR FREE TRADE PAC 89FEC/597/5000 #031124 CONTRIBUTION		HENDERSON HENDERSON TOYOTA	NC 27536	NON-PARTY QUALIFIED JUNE MONTHLY 2MAY89	PRIMARY	300
SIMMONS, FORD MR OKLAHOMANS FOR BOREN 89SEN/007/1718 #117992 CONTRIBUTION		ARDMORE RANCHER	OK 73402	SENATE MID-YEAR REPORT 30MAY89	PRIMARY	250
SIMMONS, FRED MASSACHUSETTS FINANCIAL SERVICES COMPANY POLITICAL ACTION COMMITTEE (MFS PAC) 90FEC/626/2603 #289925 CONTRIBUTION		DUXBURY MASSACHUSETTS FINANCIAL SERVICES CO	MA 02331	NON-PARTY NON-QUALIFIED YEAR-END 3DEC89	GENERAL	250
SIMMONS, G REUBEN STEVE BARTLETT CONGRESSIONAL CAMPAIGN COMMITTEE 90HSE/390/4345 #287431 CONTRIBUTION REF TO INDIVIDUAL		DALLAS	TX 75240	HOUSE YEAR-END 18OCT89	PRIMARY	100-
SIMMONS, G REUBEN MR PEOPLE FOR PETE DOMENICI (1990) 89SEN/007/2287 #114947 CONTRIBUTION		DALLAS	TX 75240	SENATE MID-YEAR REPORT 30MAY89	PRIMARY	1,000

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SIMMONS, GLENN PEOPLE FOR BOSCHWITZ 1990 89SEN/008/1880 #162689 CONTRIBUTION		DALLAS VAZHI INC	TX 75240 MID-YEAR REPORT 26APR89	SENATE PRIMARY	1,000
SIMMONS, GLENN MR LYNN MARTIN FOR SENATE 90SEN/006/2090 #312592 CONTRIBUTION		DALLAS CONTRAN CORPORATION	TX 75240 PRE-PRIMARY 16FEB90	SENATE PRIMARY	1,000
SIMMONS, GLENN R BOB SMITH FOR U S SENATE 90SEN/001/4379 #269493 CONTRIBUTION		DALLAS CONTRAN CORPORATION	TX 75240 YEAR-END 8DEC89	SENATE PRIMARY	1,000
SIMMONS, GLENN R MR MCCONNELL SENATE COMMITTEE '90 89SEN/006/4218 #134756 CONTRIBUTION		DALLAS CONTRAN CORP	TX 75240 MID-YEAR REPORT 26JUN89	SENATE PRIMARY	1,000
SIMMONS, GLENN R MR STEVE BARTLETT CONGRESSIONAL CAMPAIGN COMMITTEE 90HSE/390/4292 #285234 CONTRIBUTION		DALLAS CONTRAN CORPORATION	TX 75205 YEAR-END 18OCT89	HOUSE PRIMARY	1,000
SIMMONS, GLENN R MR HANK BROWN FOR U S SENATE 90SEN/001/3662 #308610 CONTRIBUTION		DALLAS CONTRAN	TX 75240 YEAR-END 90CT89	SENATE PRIMARY	1,000
SIMMONS, GLENN REUBEN MR FRIENDS OF PHIL GRAMM A/K/A THE TEXAS PRESIDENTIAL GALA 90SEN/004/0438 #302399 CONTRIBUTION		DALLAS CONTRAN CORP	TX 75234 YEAR-END 7DEC89	SENATE GENERAL	1,000
SIMMONS, GLENN REUBEN MRS FRIENDS OF PHIL GRAMM A/K/A THE TEXAS PRESIDENTIAL GALA 90SEN/004/0301 #301503 CONTRIBUTION		DALLAS	TX 75234 YEAR-END 7DEC89	SENATE PRIMARY	1,000
SIMMONS, GR MRS HANK BROWN FOR U S SENATE 90SEN/001/3661 #308609 CONTRIBUTION		DALLAS HOMEMAKER	TX 75240 YEAR-END 90CT89	SENATE PRIMARY	1,000
SIMMONS, GWEN DAN MICA FOR SENATE 90SEN/005/0959 #279410 CONTRIBUTION REF TO INDIVIDUAL		CLEARWATER	CA 34630 YEAR-END 27JUL89	SENATE PRIMARY	1,000-
SIMMONS, GWEN MS GUNTER FOR U S SENATE COMMITTEE 89SEN/008/2177 #065876 CONTRIBUTION		CLEARWATER ARTIST	FL 34630 MID-YEAR REPORT 14JAN89	SENATE PRIMARY	500
SIMMONS, GWEN MS GUNTER FOR U S SENATE COMMITTEE 89SEN/008/2177 #065877 CONTRIBUTION		CLEARWATER ARTIST	FL 34630 MID-YEAR REPORT 14JAN89	SENATE RUNOFF	1,000

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SIMMONS, HAROLD BILL BRADLEY FOR U S SENATE '90 89SEN/008/0803 #150026 CONTRIBUTION		NEW YORK SHEARSON LEHMAN HUTTON	NY 10128	SENATE MID-YEAR REPORT 16JUN89	GENERAL	1,000
SIMMONS, HAROLD DEMOCRATIC SENATORIAL CAMPAIGN COMMITTEE 89SEN/004/1951 #044408 CONTRIBUTION		DALLAS CONTRAN CO	TX 75240	PARTY QUALIFIED JULY MONTHLY 6JUN89	PRIMARY	15,000
SIMMONS, HAROLD ORTIZ FOR CONGRESS 89HSE/380/0203 #044795 CONTRIBUTION		DALLAS CONTRAN CORP	TX 75240	HOUSE MID-YEAR REPORT 21JUN89	PRIMARY	500
SIMMONS, HAROLD BOB SMITH FOR U S SENATE 89SEN/005/0583 #071304 CONTRIBUTION		DALLAS CON TRAN CORP	TX 75240	SENATE MID-YEAR REPORT 5JUN89	PRIMARY	1,000
SIMMONS, HAROLD FRIENDS OF DENNY SMITH 89HSE/383/0092 #076402 CONTRIBUTION		DALLAS CONTRAN	TX 75240	HOUSE MID-YEAR REPORT 19MAY89	PRIMARY	1,000
SIMMONS, HAROLD JOHN BRYANT CAMPAIGN COMMITTEE 89HSE/382/1112 #076883 CONTRIBUTION		DALLAS CONTRAN CORP	TX 75240	HOUSE MID-YEAR REPORT 23MAY89	PRIMARY	500
SIMMONS, HAROLD DR BOB LANIER FOR CONGRESS 89HSE/384/3155 #141488 CONTRIBUTION		DALLAS INVESTOR	TX 75240	HOUSE PRE-RUN-OFF 4AUG89	SPECIAL	500
SIMMONS, HAROLD FRIENDS OF CONNIE MACK 89SEN/007/1916 #152531 CONTRIBUTION		DALLAS INVESTOR	TX 75240	SENATE MID-YEAR REPORT 20JUN89	FOR 1988	1,000
SIMMONS, HAROLD PEOPLE FOR BOSCHWITZ 1990 89SEN/008/1668 #161268 CONTRIBUTION		DALLAS CONTRAN CORP	TX 75240	SENATE MID-YEAR REPORT 26APR89	GENERAL	1,000
SIMMONS, HAROLD PEOPLE FOR BOSCHWITZ 1990 89SEN/008/1770 #161951 CONTRIBUTION		DALLAS CONTRAN CORP	TX 75240	SENATE MID-YEAR REPORT 26APR89	PRIMARY	1,000
SIMMONS, HAROLD FRIENDS OF SENATOR DAVID KARNES 89SEN/009/2094 #168406 CONTRIBUTION		DALLAS CONTRAN	TX 75240	SENATE MID-YEAR REPORT 11JAN89	GENERAL	1,000
SIMMONS, HAROLD DR BOB LANIER FOR CONGRESS 89HSE/385/1780 #172052 CONTRIBUTION		DALLAS CON TRAN CORP	TX 75240	HOUSE POST-RUN-OFF 4SEP89	RUNOFF	500

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SIMMONS, HAROLD CONTRAN CORPORATION POLITICAL ACTION COMMITTEE (CONPAC) 90FEC/622/1278 #212781 CONTRIBUTION		DALLAS CONTRAN CORPORATION	TX 75225 YEAR-END 14NOV89	NON-PARTY QUALIFIED PRIMARY	5,000
SIMMONS, HAROLD U S FEDERATION OF SMALL BUSINESSES PAC (SMALL BIZ PAC) 90FEC/623/0487 #264924 CONTRIBUTION		DALLAS VALHI INC	TX 75240 YEAR-END 17NOV89	NON-PARTY QUALIFIED PRIMARY	5,000
SIMMONS, HAROLD BOB SMITH FOR U S SENATE 90SEN/001/4373 #269453 CONTRIBUTION		DALLAS CONTRAN CORPORATION	TX 75240 YEAR-END 8DEC89	SENATE GENERAL	1,000
SIMMONS, HAROLD MR TEXAS REPUBLICAN CONGRESSIONAL COMMITEE 89FEC/594/3200 #020139 CONTRIBUTION		DALLAS CONTRAN CORP	TX 75240 POST-SPECIAL 8FEB89	PARTY QUALIFIED PRIMARY	250
SIMMONS, HAROLD MR NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS * 89SEN/006/2592 #108156 CONTRIBUTION		DALLAS PRESIDENT	TX 75225 MID-YEAR REPORT 17APR89	PARTY QUALIFIED PRIMARY	1,000
SIMMONS, HAROLD MR PEOPLE FOR PETE DOMENICI (1990) 89SEN/007/2286 #114944 CONTRIBUTION		DALLAS CONTRAN CORPORATION	TX 75240 MID-YEAR REPORT 30MAY89	SENATE PRIMARY	1,000
SIMMONS, HAROLD MR OKLAHOMANS FOR BOREN 89SEN/007/1717 #117989 CONTRIBUTION		DALLAS	TX 75240 MID-YEAR REPORT 3APR89	SENATE PRIMARY	1,000
SIMMONS, HAROLD MR STEVE BARTLETT CONGRESSIONAL CAMPAIGN COMMITTEE 89HSE/383/3433 #122174 CONTRIBUTION		DALLAS CONTRAN CORPORATION	TX 75225 MID-YEAR REPORT 20APR89	HOUSE PRIMARY	250
SIMMONS, HAROLD MR FRIENDS OF MAX BAUCUS (1990 CAMPAIGN) 89SEN/006/3535 #128900 CONTRIBUTION		DALLAS CONTRAN CORPORATION	TX 75240 MID-YEAR REPORT 20JUN89	SENATE PRIMARY	1,000
SIMMONS, HAROLD MR MCCONNELL SENATE COMMITTEE '90 89SEN/006/3960 #133218 CONTRIBUTION		DALLAS CONTRAN CORPORATION	TX 75240 MID-YEAR REPORT 26JUN89	SENATE PRIMARY	1,000
SIMMONS, HAROLD MR MCCONNELL SENATE COMMITTEE '90 89SEN/006/3960 #133219 CONTRIBUTION		DALLAS CONTRAN CORPORATION	TX 75240 MID-YEAR REPORT 26JUN89	SENATE GENERAL	1,000
SIMMONS, HAROLD MR SIMON FOR SENATE 89SEN/008/3716 #147788 CONTRIBUTION		DALLAS	TX 75240 MID-YEAR REPORT 12JUN89	SENATE PRIMARY	1,000

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SIMMONS, HAROLD MR COHEN FOR SENATOR 90SEN/004/3224 #263605 CONTRIBUTION		DALLAS CONTRAN CORPORATION	TX 75240	SENATE YEAR-END 25OCT89	PRIMARY	1,000
SIMMONS, HAROLD MR CONGRESSMAN JOE BARTON COMMITTEE 90HSE/389/2073 #289692 CONTRIBUTION		DALLAS CONTRAN CORP	TX 75240	HOUSE YEAR-END 17JUL89	PRIMARY	1,000
SIMMONS, HAROLD MR HANK BROWN FOR U S SENATE 90SEN/001/3662 #308611 CONTRIBUTION		DALLAS CONTRAN	TX 75240	SENATE YEAR-END 90CT89	PRIMARY	1,000
SIMMONS, HAROLD MR LYNN MARTIN FOR SENATE 90SEN/006/2091 #312593 CONTRIBUTION		DALLAS CONTRAN CORPORATION	TX 75240	SENATE PRE-PRIMARY 16FEB90	PRIMARY	1,000
SIMMONS, HAROLD MR LYNN MARTIN FOR SENATE 90SEN/006/2091 #312594 CONTRIBUTION		DALLAS CONTRAN CORPORATION	TX 75240	SENATE PRE-PRIMARY 16FEB90	GENERAL	1,000
SIMMONS, HAROLD MRS STEVE BARTLETT CONGRESSIONAL CAMPAIGN COMMITTEE 90HSE/390/4293 #285235 CONTRIBUTION		DALLAS HOMEMAKER	TX 75225	HOUSE YEAR-END 16OCT89	PRIMARY	1,000
SIMMONS, JAMES JR MR FRIENDS OF PHIL GRAMM A/K/A THE TEXAS PRESIDENTIAL GALA 90SEN/004/0529 #303001 CONTRIBUTION		CYPRESS	TX 77429	SENATE YEAR-END 21DEC89	PRIMARY	350
SIMMONS, JAMES P RHODES FOR CONGRESS COMMITTEE 89HSE/380/0737 #045144 CONTRIBUTION		PHOENIX VALLEY NATL BANK	AZ 85007	HOUSE MID-YEAR REPORT 17MAR89	PRIMARY	225
SIMMONS, JAMES P RHODES FOR CONGRESS COMMITTEE 90HSE/390/4184 #239249 CONTRIBUTION		PHOENIX VALLEY NATIONAL BANK	AZ 85001	HOUSE YEAR-END 4NOV89	PRIMARY	250
SIMMONS, JAMES P MCCAIN REELECTION COMMITTEE 90SEN/001/3041 #268778 CONTRIBUTION		PHOENIX VALLEY NATIONAL BANK	AZ 85001	SENATE YEAR-END 17OCT89	PRIMARY	500
SIMMONS, JAMES P MCCAIN REELECTION COMMITTEE 90SEN/001/3041 #268779 CONTRIBUTION		PHOENIX VALLEY NATIONAL BANK	AZ 85001	SENATE YEAR-END 17OCT89	PRIMARY	500
SIMMONS, JAMES P MCCAIN REELECTION COMMITTEE 90SEN/001/3041 #268780 CONTRIBUTION		PHOENIX VALLEY NATIONAL BANK	AZ 85001	SENATE YEAR-END 28DEC89	GENERAL	1,000

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SIMMONS, JAMES P MR REPUBLICAN NATIONAL COMMITTEE - CONTRIBUTIONS (AKA REPUBLICAN NATIONAL FINANCE COMMITTEE 90FEC/623/4486 #224915 CONTRIBUTION		PARADISE VALLEY COMMERCIAL BANKER	AZ 85253	PARTY QUALIFIED YEAR-END 22DEC89	PRIMARY	1,000
SIMMONS, JAMES P MR JOHN KYL RE-ELECTION COMMITTEE 90HSE/391/1389 #248414 CONTRIBUTION		PARADISE VALLEY VALLEY NATL CORP	AZ 85253	HOUSE YEAR-END 21DEC89	PRIMARY	1,000
SIMMONS, JAMES P MRS JOHN KYL RE-ELECTION COMMITTEE 90HSE/391/1392 #248437 CONTRIBUTION		PARADISE VALLEY HOMEMAKER	AZ 85253	HOUSE YEAR-END 21DEC89	PRIMARY	1,000
SIMMONS, JAY MRS STEVE BARTLETT CONGRESSIONAL CAMPAIGN COMMITTEE 90HSE/390/4293 #285236 CONTRIBUTION		DALLAS HOUSEWIFE	TX 75209	HOUSE YEAR-END 4DEC89	PRIMARY	1,000
SIMMONS, JEAN IKE SKELTON FOR CONGRESS COMMITTEE 89HSE/380/1430 #044256 CONTRIBUTION		WINDSOR HOUSEWIFE	MO 65360	HOUSE MID-YEAR REPORT 8MAR89	PRIMARY	250
SIMMONS, JERRY M WOMEN IN PSYCHOLOGY FOR LEGISLATIVE ACTION 90FEC/627/4291 #271310 LOAN FROM INDIVIDUAL		SANTA MONICA SIMMONS & MCANDREWS	CA 90401	NON-PARTY NON-QUALIFIED YEAR-END 10JUL89	PRIMARY	250
SIMMONS, JIMMIE D DAVID PRYOR FOR U.S. SENATE COMMITTEE 89SEN/005/3166 #092694 CONTRIBUTION		SHREVEPORT ARKLA EXPLORATION CO	LA 71106	SENATE MID-YEAR REPORT 1MAR89	PRIMARY	500
SIMMONS, JOHN KEEP HOPE ALIVE POLITICAL ACTION COMMITTEE 89FEC/605/4334 #125867 CONTRIBUTION		AMHERST PARTICIPATION ASSOC	MA 01002	NON-PARTY NON-QUALIFIED MID-YEAR REPORT 11APR89	PRIMARY	1,000
SIMMONS, JOHN F MR NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS * 90SEN/002/3187 #277425 CONTRIBUTION		OLD REDFORD	MI 48219	PARTY QUALIFIED YEAR-END 12SEP89	PRIMARY	250
SIMMONS, JOHN F MR NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS * 90SEN/002/3187 #277426 CONTRIBUTION		OLD REDFORD	MI 48219	PARTY QUALIFIED YEAR-END 12SEP89	PRIMARY	275
SIMMONS, JOHN H CONGRESSMAN FLOYD H FLAKE CAMPAIGN COMMITTEE 89HSE/382/3525 #074573 CONTRIBUTION		JAMAICA REAL ESTATE BROKER	NY 11434	HOUSE MID-YEAR REPORT 12JAN89	PRIMARY	243
SIMMONS, JOHN J MR CARPENTERS LEGISLATIVE IMPROVEMENT COMM, UNITED BROTHERHOOD OF CARPENTERS & JOINERS OF AME 89FEC/614/5094 #180922 CONTRIBUTION		OSWEGO LOCAL UNION 747	NY 13126	NON-PARTY QUALIFIED NOVEMBER MONTHLY 16OCT89	PRIMARY	240

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SIMMONS, JOHN MR SIMON FOR SENATE 89SEN/008/3716 #147789 CONTRIBUTION		AMHERST BUSINESS MANAGEMENT CONSULTANT	MA 01002	SENATE MID-YEAR REPORT 23MAR89	PRIMARY	1,000
SIMMONS, JOHN MR DEMOCRATIC CONGRESSIONAL CAMPAIGN COMMITTEE INC 90HSE/389/0066 #220589 CONTRIBUTION		CHICAGO	IL 60614	PARTY QUALIFIED YEAR-END 12DEC89	PRIMARY	200
SIMMONS, JOHN M MR NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS * 90SEN/002/3187 #277424 CONTRIBUTION		FLINTRIDGE	CA 91011	PARTY QUALIFIED YEAR-END 1AUG89	PRIMARY	1,000
SIMMONS, KENNETT DURENBERGER FOR U S SENATE VOLUNTEER COMMITTEE 90SEN/004/3779 #294413 CONTRIBUTION		WAYZATA UNITED HEALTH CARE CORP	MN 55391	SENATE YEAR-END 21SEP89	PRIMARY	500
SIMMONS, LISA CONTRAN CORPORATION POLITICAL ACTION COMMITTEE (CONPAC) 90FEC/622/1278 #212784 CONTRIBUTION		DALLAS CONTRAN CORPORATION	TX 75209	NON-PARTY QUALIFIED YEAR-END 14NOV89	PRIMARY	5,000
SIMMONS, LISA U S FEDERATION OF SMALL BUSINESSES PAC (SMALL BIZ PAC) 90FEC/623/0487 #264928 CONTRIBUTION		DALLAS CONTRAN CORP	TX 75240	NON-PARTY QUALIFIED YEAR-END 16NOV89	PRIMARY	5,000
SIMMONS, LISA BOB SMITH FOR U S SENATE 90SEN/001/4379 #269492 CONTRIBUTION		DALLAS SIMMONS FOUNDATION	TX 75240	SENATE YEAR-END 8DEC89	PRIMARY	1,000
SIMMONS, LISA MS HANK BROWN FOR U S SENATE 90SEN/001/3662 #308612 CONTRIBUTION		DALLAS HAROLD SIMMONS FOUNDATION	TX 75225	SENATE YEAR-END 9OCT89	PRIMARY	1,000
SIMMONS, LISA MS LYNN MARTIN FOR SENATE 90SEN/006/2091 #312595 CONTRIBUTION		DALLAS HAROLD SIMMONS FOUND	TX 75240	SENATE PRE-PRIMARY 16FEB90	PRIMARY	1,000
SIMMONS, LORETTA B NATIONAL UTILITY CONTRACTORS ASSN LEGISLATIVE INFORMATION & ACTION COMMITTEE 89FEC/604/3082 #092039 CONTRIBUTION		ROCHESTER BLAIR SUPPLY CORP	NY 14624	NON-PARTY QUALIFIED MID-YEAR REPORT 6JUN89	PRIMARY	1,000
SIMMONS, MARILYN AMERICANS FOR A BI-PARTISAN COALITION 89FEC/603/2768 #143708 CONTRIBUTION		LITTLE ROCK HOUSEWIFE	AR 72212	NON-PARTY NON-QUALIFIED MID-YEAR REPORT 3MAY89	PRIMARY	250
SIMMONS, MARK MEL HANCOCK FOR CONGRESS 89HSE/382/2264 #067522 CONTRIBUTION		SILOAM SPRINGS POULTRY PRODUCER	AR 72761	HOUSE MID-YEAR REPORT 13JUN89	PRIMARY	1,000

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SIMMONS, MARK DAVID PRYOR FOR U.S. SENATE COMMITTEE 89SEN/005/3167 #092695 CONTRIBUTION		SILOAM SPRGS SIMMONS INDUSTRIES	AR 72761 SENATE MID-YEAR REPORT 17MAR89	PRIMARY	1,000
SIMMONS, MARK DAVID PRYOR FOR U.S. SENATE COMMITTEE 89SEN/005/3167 #092696 CONTRIBUTION		SILOAM SPRGS SIMMONS INDUSTRIES	AR 72761 SENATE MID-YEAR REPORT 17MAR89	GENERAL	1,000
SIMMONS, MARK MRS DAVID PRYOR FOR U.S. SENATE COMMITTEE 89SEN/005/3167 3092697 CONTRIBUTION		HOT SPRINGS HOUSEWIFE	AR 72761 SENATE MID-YEAR REPORT 23MAR89	PRIMARY	1,000
SIMMONS, MATTHEW CHET EDWARDS FOR CONGRESS 90HSE/392/1307 #295872 CONTRIBUTION		HOUSTON SIMMONS & COMPANY	TX 77002 HOUSE PRE-PRIMARY 2FEB90	PRIMARY	1,000
SIMMONS, MATTHEW R MR FRIENDS OF PHIL GRAMM A/K/A THE TEXAS PRESIDENTIAL GALA 89SEN/006/0353 #083619 CONTRIBUTION		HOUSTON SIMMONS & CO	TX 77002 SENATE MID-YEAR REPORT 27JAN89	PRIMARY	1,000
SIMMONS, MICHAEL BANKAMERICA FEDERAL ELECTION FUND 89FEC/606/3423 #076775 CONTRIBUTION		ALAMO BANK OF AMERICA	CA 94507 NON-PARTY QUALIFIED AUGUST MONTHLY 18JUL89	PRIMARY	1,000
SIMMONS, MICHAEL BILL BRADLEY FOR U S SENATE '90 90SEN/004/2143 #315102 CONTRIBUTION		ALAMO BANK OF AMERICA	CA 94507 SENATE YEAR-END 30NOV89	PRIMARY	1,000
SIMMONS, MICHAEL J DAN HEATH FOR CONGRESS COMMITTEE 89HSE/377/3784 #004253 CONTRIBUTION		FORT WAYNE COMCAST CABLE VISION	IN 46835 HOUSE PRE-SPECIAL 8MAR89	GENERAL	250
SIMMONS, MICKAIL MASSACHUSETTS FINANCIAL SERVICES COMPANY POLITICAL ACTION COMMITTEE (MFS PAC) 90FEC/626/2603 #289926 CONTRIBUTION		DUXBURY MASSACHUSETTS FINANCIAL SERVICES CO	MA 02331 NON-PARTY NON-QUALIFIED YEAR-END 3DEC89	GENERAL	250
SIMMONS, N O RIO GRANDE VALLEY ORTIZ FOR CONGRESS COMMITTEE 89HSE/380/0221 #044961 CONTRIBUTION		BROWNSVILLE REAL ESTATE	TX 78521 HOUSE MID-YEAR REPORT 19MAY89	PRIMARY	500
SIMMONS, ORMAN AMERICANS FOR A BI-PARTISAN COALITION 89FEC/603/2768 #143709 CONTRIBUTION		LITTLE ROCK DOCTOR	AR 72212 NON-PARTY NON-QUALIFIED MID-YEAR REPORT 3MAY89	PRIMARY	250
SIMMONS, ORMAN M REPUBLICAN PARTY OF ARKANSAS 89FEC/604/3297 #060901 CONTRIBUTION		LITTLE ROCK PHYSICIAN	AR 72212 PARTY QUALIFIED MID-YEAR REPORT 27APR89	PRIMARY	500

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SIMMONS, PATRICIA E TAUKE FOR SENATE COMMITTEE 89SEN/007/3170 #111319 CONTRIBUTION		ALEXANDRIA CENTEL CORPORATION	VA 22305	SENATE MID-YEAR REPORT 19APR89	PRIMARY	250
SIMMONS, PATRICIA E MCCAIN REELECTION COMMITTEE 90SEN/001/3051 #268840 CONTRIBUTION		PARADISE VALLEY HOUSEWIFE	AZ 85253	SENATE YEAR-END 28DEC89	PRIMARY	1,000
SIMMONS, PATRICK MR FRIENDS OF PHIL GRAMM A/K/A THE TEXAS PRESIDENTIAL GALA 90SEN/004/0752 #304451 CONTRIBUTION		MEXIA	TX 76667	SENATE YEAR-END 24OCT89	PRIMARY	250
SIMMONS, PAUL NEW MEXICANS FOR BILL RICHARDSON 90HSE/388/4668 #294490 CONTRIBUTION		SANTA FE	NM 87501	HOUSE YEAR-END 31JUL89	PRIMARY	500
SIMMONS, PAUL M A LOT OF PEOPLE WHO SUPPORT JEFF BINGAMAN (1994) 90SEN/004/3939 #283029 CONTRIBUTION		SANTA FE	NM 87501	SENATE YEAR-END 17NOV89	PRIMARY	333
SIMMONS, R P FRIENDS OF CONGRESSMAN TOM RIDGE COMMITTEE 89HSE/380/0071 #044935 CONTRIBUTION		SEWICKLEY ALLEGHENY LUDLOW CO	PA 15143	HOUSE MID-YEAR REPORT 18MAY89	PRIMARY	250
SIMMONS, RICHARD ALEXANDER CAMPAIGN COMMITTEE [AR/01] 90HSE/389/0617 #256169 CONTRIBUTION		RECTOR FARMER	AR 72461	HOUSE YEAR-END 8NOV89	PRIMARY	250
SIMMONS, RICHARD J MD AMERICAN ACADEMY OF OPHTHALMOLOGY INC POLITICAL COMMITTEE ("OPHTHPAC") 89FEC/615/3542 #181564 CONTRIBUTION		BOSTON OPHTHALMOLOGIST	MA 02114	NON-PARTY QUALIFIED POST-RUN-OFF 1NOV89	PRIMARY	250
SIMMONS, RICHARD MR HASTERT FOR CONGRESS COMMITTEE 89HSE/380/2535 #059128 CONTRIBUTION		WAYNE CENTER	IL 60185	HOUSE MID-YEAR REPORT 26JUN89	PRIMARY	250
SIMMONS, RICHARD MRS HASTERT FOR CONGRESS COMMITTEE 89HSE/380/2535 #059129 CONTRIBUTION		WAYNE CENTER	IL 60185	HOUSE MID-YEAR REPORT 26JUN89	PRIMARY	250
SIMMONS, RICHARD P PEOPLE FOR JOHN HEINZ COMMITTEE 90SEN/001/3255 #250229 CONTRIBUTION		PITTSBURGH ALLEGHENY LUDLUM STEEL	PA 15143	SENATE YEAR-END 18JUL89	PRIMARY	500
SIMMONS, RICHARD P MR NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS * 89SEN/006/2592 #108157 CONTRIBUTION		PITTSBURGH CHAIRMAN	PA 15222	PARTY QUALIFIED MID-YEAR REPORT 23MAR89	PRIMARY	2,000

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SIMMONS, RICHARD P MR CITIZENS FOR ARLEN SPECTER 89SEN/006/3151 #139871	CONTRIBUTION	PITTSBURGH ALLEGHENY LUDLUM STEEL	PA 15222	SENATE MID-YEAR REPORT 21JUN89	PRIMARY	1,000
SIMMONS, RICHARD P MR FRIENDS OF CLAUDINE 90HSE/391/2015 #288884	CONTRIBUTION	SEWICKLEY ALLEGHENY LUDLUM STEEL	PA 15143	SENATE YEAR-END 28DEC89	PRIMARY	500
SIMMONS, RICHARD P MR FRIENDS OF SENATOR ROCKEFELLER 90SEN/003/0234 #300183	CONTRIBUTION	SEWICKLEY ALLEGHENY LUDLUM CORPORATION	PA 15143	SENATE YEAR-END 18DEC89	PRIMARY	500
SIMMONS, RICHARD S KERRY FOR SENATE IN 90 COMMITTEE 89SEN/005/1098 #064969	CONTRIBUTION	NEW YORK CHEMICAL BANK	NY 11030	SENATE MID-YEAR REPORT 21MAR89	PRIMARY	500
SIMMONS, RICHARD W DB&S POLITICAL ACTION COMMITTEE 89FEC/606/0073 #151497	CONTRIBUTION	HOUSTON DOTSON, BABCOCK & SCOFIELD	TX 77002	NON-PARTY NON-QUALIFIED MID-YEAR REPORT 6JUN89	PRIMARY	207
SIMMONS, ROBERT L BUILD POLITICAL ACTION COMMITTEE OF THE NATIONAL ASSOCIATION OF HOME BUILDERS 90FEC/629/0750 #287738	CONTRIBUTION	GAITHERSBURG KETTLER FORLINES INC	MD 20879	NON-PARTY QUALIFIED FEBRUARY MONTHLY 8JAN90	PRIMARY	1,000
SIMMONS, ROSANNA FRIENDS OF LARRY PRESSLER 89SEN/007/3070 #113827	CONTRIBUTION	GREENWICH	CT 06830	SENATE MID-YEAR REPORT 20APR89	PRIMARY	250
SIMMONS, ROY MR CONGRESSMAN JOE BARTON COMMITTEE 90HSE/389/2076 #289704	CONTRIBUTION	MEXIA ATTORNEY	TX 76667	HOUSE YEAR-END 28SEP89	PRIMARY	250
SIMMONS, ROY MR FRIENDS OF PHIL GRAMM A/K/A THE TEXAS PRESIDENTIAL GALA 90SEN/004/0552 #303148	CONTRIBUTION	MEXIA SIMMONS & SIMMONS	TX 76667	SENATE YEAR-END 24OCT89	PRIMARY	250
SIMMONS, RUSSELL E RE-ELECT MARILYN LLOYD TO CONGRESS COMMITTEE 90HSE/391/0343 #280167	CONTRIBUTION	ROCKWOOD	TN 37854	HOUSE YEAR-END 24AUG89	PRIMARY	500
SIMMONS, SARA NEW MEXICANS FOR BILL RICHARDSON 90HSE/388/4668 #294491	CONTRIBUTION	SANTA FE	NM 87501	HOUSE YEAR-END 31JUL89	PRIMARY	500
SIMMONS, SARA G A LOT OF PEOPLE WHO SUPPORT JEFF BINGAMAN (1994) 90SEN/004/3939 #283030	CONTRIBUTION	SANTA FE	NM 87501	SENATE YEAR-END 17NOV89	PRIMARY	333

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SIMMONS, SERENA CONTRAN CORPORATION POLITICAL ACTION COMMITTEE (CONPAC) 90FEC/622/1278 #212783 CONTRIBUTION		DALLAS STUDENT	TX 75240 YEAR-END 14NOV89	NON-PARTY QUALIFIED PRIMARY	5,000
SIMMONS, SERENA U S FEDERATION OF SMALL BUSINESSES PAC (SMALL BIZ PAC) 90FEC/623/0487 #264926 CONTRIBUTION		DALLAS STUDENT	TX 75240 YEAR-END 17NOV89	NON-PARTY QUALIFIED PRIMARY	5,000
SIMMONS, SERENA BOB SMITH FOR U S SENATE 90SEN/001/4379 #269491 CONTRIBUTION		DALLAS STUDENT	TX 75240 YEAR-END 8DEC89	SENATE PRIMARY	1,000
SIMMONS, SERENA MS COHEN FOR SENATOR 90SEN/004/3257 #263807 CONTRIBUTION		DALLAS STUDENT	TX 75240 YEAR-END 25OCT89	SENATE PRIMARY	1,000
SIMMONS, SERENA MS FRIENDS OF PHIL GRAMM A/K/A THE TEXAS PRESIDENTIAL GALA 90SEN/004/0406 #302195 CONTRIBUTION		DALLAS STUDENT	TX 75240 YEAR-END 7DEC89	SENATE PRIMARY	1,000
SIMMONS, SERENA MS FRIENDS OF PHIL GRAMM A/K/A THE TEXAS PRESIDENTIAL GALA 90SEN/004/0406 #302196 CONTRIBUTION		DALLAS STUDENT	TX 75240 YEAR-END 7DEC89	SENATE GENERAL	1,000
SIMMONS, SERENA MS HANK BROWN FOR U S SENATE 90SEN/001/3662 #308613 CONTRIBUTION		DALLAS STUDENT	TX 75225 YEAR-END 9OCT89	SENATE PRIMARY	1,000
SIMMONS, SERENA MS LYNN MARTIN FOR SENATE 90SEN/006/2091 #312596 CONTRIBUTION		DALLAS STUDENT	TX 75240 PRE-PRIMARY 16FEB90	SENATE PRIMARY	1,000
SIMMONS, STEVE SENATOR HUGH PARMER COMMITTEE 89SEN/006/3653 #145770 CONTRIBUTION		EL PASO	TX 79925 MID-YEAR REPORT 30JUN89	SENATE PRIMARY	250
SIMMONS, STEVEN NATIONAL CABLE TELEVISION ASSOCIATION'S POLITICAL ACTION COMMITTEE (CABLE PAC) 89FEC/589/0095 #004818 CONTRIBUTION		GREENWICH SIMMONS COMMUNICATIONS	CO 06830 MARCH MONTHLY 14FEB89	NON-PARTY QUALIFIED PRIMARY	2,000
SIMMONS, T B JR FORD BANK GROUP POLITICAL ACTION COMMITTEE INC 90FEC/625/0990 #270076 CONTRIBUTION		LUBBOCK FORD BANK GROUP INC	TX 79410 YEAR-END 16NOV89	NON-PARTY NON-QUALIFIED PRIMARY	300
SIMMONS, TIFTON COELHO FOR CONGRESS COMMITTEE 89HSE/382/2667 #073200 CONTRIBUTION		NEW YORK SMITH BARNEY	NY 10019 MID-YEAR REPORT 12MAY89	HOUSE PRIMARY	1,000

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SIMMONS, WENDELL L MR NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS # 89SEN/006/2592 #108158 CONTRIBUTION		DUNEDIN	FL 33528 MID-YEAR REPORT 27MAR89	PARTY QUALIFIED PRIMARY	1,000
SIMMONS, WILBUR E MR MCMILLEN FOR CONGRESS 89HSE/382/3432 #073859 CONTRIBUTION		ANNAPOLIS THE KMS GROUP INC	MD 21403 MID-YEAR REPORT 4MAY89	HOUSE PRIMARY	500
SIMMONS, WILBUR E MRS MCMILLEN FOR CONGRESS 89HSE/382/3432 #073860 CONTRIBUTION		ANNAPOLIS THE KMS GROUP INC	MD 21403 MID-YEAR REPORT 4MAY89	HOUSE PRIMARY	500
SIMMONS, WILLARD B SR WARD PAC 89FEC/617/4865 #188218 CONTRIBUTION		CHICAGO IL ASSN COMM PHCY	IL 60601 DECEMBER MONTHLY 21NOV89	NON-PARTY QUALIFIED PRIMARY	200

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KRAVIS, BESSIE PEOPLE FOR BOSCHWITZ 1990 89SEN/008/1674 #161306 CONTRIBUTION		TULSA HOMEMAKER	OK 74114 SENATE MID-YEAR REPORT 30MAR89	GENERAL	1,000
KRAVIS, BESSIE PEOPLE FOR BOSCHWITZ 1990 89SEN/008/1856 #162526 CONTRIBUTION		TULSA HOMEMAKER	OK 74114 SENATE MID-YEAR REPORT 30MAR89	PRIMARY	1,000
KRAVIS, CAROLYN ROEHM PEOPLE FOR BOSCHWITZ 1990 90SEN/004/2825 #292018 CONTRIBUTION		NEW YORK CAROLYN ROEHM INC	NY 10018 SENATE YEAR-END 29DEC89	PRIMARY	1,000
KRAVIS, HELENE 500 CLUB 90FEC/620/1845 #199392 CONTRIBUTION		NEW YORK CULLMAN & KRAVIS	NY 10028 NON-PARTY QUALIFIED YEAR-END 8NOV89	PRIMARY	500
KRAVIS, HENRY PEOPLE FOR BOSCHWITZ 1990 89SEN/008/1795 #162119 CONTRIBUTION		NEW YORK INVESTOR	NY 10021 SENATE MID-YEAR REPORT 10APR89	PRIMARY	1,000
KRAVIS, HENRY PEOPLE FOR BOSCHWITZ 1990 89SEN/008/1795 #162120 CONTRIBUTION		NEW YORK	NY SENATE MID-YEAR REPORT 22JUN89	PRIMARY	1,000
KRAVIS, HENRY 500 CLUB 90FEC/620/1841 #199366 CONTRIBUTION		NEW YORK KOHLBERG KRAVIS	NY 10021 NON-PARTY QUALIFIED YEAR-END 16SEP89	PRIMARY	500
KRAVIS, HENRY PEOPLE FOR BOSCHWITZ 1990 90SEN/004/2873 #292168 CONTRIBUTION		NEW YORK KOHLBERG KRAVIS ROBERTS & COMPANY	NY 10021 SENATE YEAR-END 12AUG89	PRIMARY	1,000-
KRAVIS, HENRY PEOPLE FOR BOSCHWITZ 1990 90SEN/004/2873 #292169 CONTRIBUTION		NEW YORK	NY 10021 SENATE YEAR-END 12AUG89	GENERAL	1,000
KRAVIS, HENRY J MR CITIZENS FOR DOWNEY 89HSE/380/3917 #057767 CONTRIBUTION		NEW YORK KOHLBERG KRAVIS ROBERTS & CO	NY 10021 HOUSE MID-YEAR REPORT 19JUN89	PRIMARY	500
KRAVIS, HENRY R BILL BRADLEY FOR U S SENATE '90 89SEN/008/0690 #149137 CONTRIBUTION		NEW YORK KOHLBERG KRAVIS ROBERTS & CO	NY 10021 SENATE MID-YEAR REPORT 4MAY89	GENERAL	1,000
KRAVIS, HENRY R MR NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS # 89SEN/006/1932 #104705 CONTRIBUTION		NEW YORK GENERAL PARTNER	NY 10019 PARTY QUALIFIED MID-YEAR REPORT 31JAN89	PRIMARY	10,000

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KRAVIS, HENRY R MR NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS * 89SEN/006/1932 #104706 CONTRIBUTION		NEW YORK GENERAL PARTNER	NY 10019	PARTY QUALIFIED MID-YEAR REPORT 9FEB89	PRIMARY	650
KRAVIS, HENRY R MR PEOPLE FOR PETE DOMENICI (1990) 89SEN/007/2305 #115078 CONTRIBUTION		NEW YORK KRAVIS ROBERTSON CO	NY 10021	SENATE MID-YEAR REPORT 21APR89	PRIMARY	1,000
KRAVIS, HENRY R MR FRIENDS OF PHIL GRAMM A/K/A THE TEXAS PRESIDENTIAL GALA 90SEN/004/0873 #305254 CONTRIBUTION		NEW YORK KOHLBERG KRAVIS ROBERTS & CO	NY 10021	SENATE YEAR-END 21NOV89	PRIMARY	1,000
KRAVIS, RAYMOND OKLAHOMA LEADERSHIP COUNCIL 89FEC/605/0394 #063375 CONTRIBUTION		TULSA	OK 74114	PARTY QUALIFIED MID-YEAR REPORT 9MAR89	PRIMARY	500
KRAVIS, RAYMOND PEOPLE FOR BOSCHWITZ 1990 89SEN/008/1677 #161325 CONTRIBUTION		TULSA OIL & GAS PRODUCER	OK 74103	SENATE MID-YEAR REPORT 30MAR89	GENERAL	1,000
KRAVIS, RAYMOND PEOPLE FOR BOSCHWITZ 1990 89SEN/008/1852 #162502 CONTRIBUTION		TULSA INVES RAYMOND KRAVIS	OK 74103	SENATE MID-YEAR REPORT 30MAR89	PRIMARY	1,000
KRAVIS, RAYMOND F MIKE SYNAR FOR CONGRESS COMMITTEE 89HSE/381/4150 #060695 CONTRIBUTION		TULSA PETROLEUM CONSULTANT	OK 74103	HOUSE MID-YEAR REPORT 14APR89	PRIMARY	350
KRAVIS, RAYMOND F FRIENDS OF JIM INHOFE 89HSE/382/2582 #074662 CONTRIBUTION		TULSA	OK 74103	HOUSE MID-YEAR REPORT 12JUN89	PRIMARY	250
KRAVIS, RAYMOND F MR REPUBLICAN NATIONAL COMMITTEE - CONTRIBUTIONS (AKA REPUBLICAN NATIONAL FINANCE COMMITTEE 89FEC/591/1363 #011432 CONTRIBUTION		TULSA INVESTOR	OK 74103	PARTY QUALIFIED APRIL QUARTERLY 3JAN89	PRIMARY	10,000
KRAVIS, RAYMOND F MR REPUBLICAN CONGRESSIONAL BOOSTERS CLUB 89FEC/591/4202 #014190 CONTRIBUTION		TULSA RETIRED	OK 74103	NON-PARTY QUALIFIED APRIL MONTHLY 21MAR89	PRIMARY	500
KRAVIS, RAYMOND F MR CONSERVATIVE VICTORY COMMITTEE 89FEC/603/1879 #080871 CONTRIBUTION		TULSA	OK 74103	NON-PARTY QUALIFIED MID-YEAR REPORT 22MAR89	PRIMARY	1,000
KRAVIS, RAYMOND F MR FRIENDS OF SENATOR CARL LEVIN 89SEN/005/1962 #085343 CONTRIBUTION		TULSA INVESTMENTS	OK 74103	SENATE MID-YEAR REPORT 21APR89	PRIMARY	1,000

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KRAVIS, RAYMOND F MR		TULSA	OK 74103	SENATE	
OKLAHOMANS FOR BOREN			MID-YEAR REPORT	GENERAL	500
89SEN/007/1661 #117734	CONTRIBUTION	RAYMOND F KRAVIS AND ASSOC	23JUN89		
KRAVIS, RAYMOND F MR		PALM BEACH	FL 33480	SENATE	
MCCONNELL SENATE COMMITTEE '90			MID-YEAR REPORT	PRIMARY	1,000
89SEN/006/3964 #133242	CONTRIBUTION	OIL & GAS	10MAR89		
KRAVIS, RAYMOND F MR		TULSA	OK 74103	PARTY QUALIFIED	
NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS *			YEAR-END	PRIMARY	10,000
90SEN/002/2076 #275229	CONTRIBUTION		10JUL89		
KRAVIS, RAYMOND F MRS		TULSA	OK 74103	NON-PARTY QUALIFIED	
REPUBLICAN CONGRESSIONAL BOOSTERS CLUB			APRIL MONTHLY	PRIMARY	500
89FEC/591/4202 #014192	CONTRIBUTION	RETIRED	21MAR89		

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PERELMAN, CLAUDIA C MS COHEN FOR SENATOR 89SEN/008/0104 #066674 CONTRIBUTION		NEW YORK HOMEMAKER	NY 10021	SENATE MID-YEAR REPORT 23MAY89	PRIMARY	1,000
PERELMAN, CLAUDIA C MS COHEN FOR SENATOR 89SEN/008/0105 #066675 CONTRIBUTION		NEW YORK HOMEMAKER	NY 10021	SENATE MID-YEAR REPORT 23MAY89	GENERAL	1,000
PERELMAN, CLAUDIA COHEN KERRY FOR SENATE IN 90 COMMITTEE 89SEN/005/1067 #064712 CONTRIBUTION		NEW YORK WABC-TV	NY 10021	SENATE MID-YEAR REPORT 21MAR89	PRIMARY	1,000
PERELMAN, CLAUDIA COHEN KERRY FOR SENATE IN 90 COMMITTEE 89SEN/005/1067 #064713 CONTRIBUTION		NEW YORK WABC-TV	NY 10021	SENATE MID-YEAR REPORT 21MAR89	GENERAL	1,000
PERELMAN, CLAUDIA COHEN MRS DOLE FOR SENATE '92 89SEN/004/2590 #055967 CONTRIBUTION		NEW YORK WABC	NY 10021	SENATE MID-YEAR REPORT 22JUN89	PRIMARY	1,000
PERELMAN, CLAUDIA COHEN MRS FRIENDS OF MAX BAUCUS (1990 CAMPAIGN) 89SEN/006/3521 #128865 CONTRIBUTION		NEW YORK ABC NEWS	NY 10021	SENATE MID-YEAR REPORT 5JUN89	PRIMARY	1,000
PERELMAN, DON COMMITTEE TO SUPPORT THE ANTITRUST LAWS POLITICAL ACTION COMMITTEE (COSAL PAC) 90FEC/627/5208 #271247 CONTRIBUTION		PHILADELPHIA ATTORNEY	PA 19103	NON-PARTY NON-QUALIFIED YEAR-END 16OCT89	PRIMARY	200
PERELMAN, DONALD MR FRIENDS OF SENATOR CARL LEVIN 90SEN/001/1285 #215102 CONTRIBUTION		PHILADELPHIA LAWYER	PA 19103	SENATE YEAR-END 7NOV89	PRIMARY	500
PERELMAN, L J COMMITTEE FOR DEMOCRATIC OPPORTUNITY 89FEC/606/0382 #129012 CONTRIBUTION		PHILADELPHIA AMERICAN PAPER PRODUCTS CO	PA 19134	NON-PARTY QUALIFIED MID-YEAR REPORT 24APR89	PRIMARY	250
PERELMAN, LEON J MR CITIZENS FOR ARLEN SPECTER 89SEN/006/3162 #138936 CONTRIBUTION		CHERRY HILL AMERICAN PAPER PRODUCT	NJ 08002	SENATE MID-YEAR REPORT 11MAY89	PRIMARY	250
PERELMAN, MEL MR DAN COATS FOR INDIANA A/K/A DAN COATS FOR SENATE COMMITTEE 89SEN/008/1006 #153487 CONTRIBUTION		CARMEL	IN 46032	SENATE MID-YEAR REPORT 27JUN89	PRIMARY	1,000
PERELMAN, MELVIN ELI LILLY AND COMPANY POLITICAL ACTION COMMITTEE 89FEC/614/4779 #182003 CONTRIBUTION		CARMEL ELI LILLY & COMPANY	IN 46032	NON-PARTY QUALIFIED NOVEMBER MONTHLY 18OCT89	PRIMARY	1,000

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PERELMAN, RAYMOND G FOGLIETTA '90 COMMITTEE 90HSE/389/2680 #240336	CONTRIBUTION	PHILADELPHIA BELMONT INDUSTRIES	PA 19103	HOUSE YEAR-END 6DEC89	PRIMARY	250
PERELMAN, RAYMOND G MR CITIZENS FOR ARLEN SPECTER 89SEN/006/3143 #138818	CONTRIBUTION	PHILADELPHIA BELMONT INDUSTRIES INC	PA 19103	SENATE MID-YEAR REPORT 25APR89	PRIMARY	500
PERELMAN, RAYMOND G MR CITIZENS FOR ARLEN SPECTER 89SEN/006/3143 #138819	CONTRIBUTION	PHILADELPHIA BELMONT INDUSTRIES INC	PA 19103	SENATE MID-YEAR REPORT 25APR89	GENERAL	500
PERELMAN, RONALD O DEMOCRATIC SENATORIAL CAMPAIGN COMMITTEE 89SEN/003/3980 #023749	CONTRIBUTION	NEW YORK REVLON GROUP INC	NY 10021	PARTY QUALIFIED MAY MONTHLY 11APR89	PRIMARY	10,000
PERELMAN, RONALD O WHITTAKER FOR CONGRESS COMMITTEE 89HSE/380/1798 #044560	CONTRIBUTION	NEW YORK MACANDREWS & FORBES	NY 10021	HOUSE MID-YEAR REPORT 22JUN89	PRIMARY	800
PERELMAN, RONALD O DOLE FOR SENATE '92 89SEN/004/2590 #055965	CONTRIBUTION	NEW YORK MCANDREWS & FORBES	NY 10021	SENATE MID-YEAR REPORT 22JUN89	PRIMARY	1,000
PERELMAN, RONALD O DOLE FOR SENATE '92 89SEN/004/2590 #055966	CONTRIBUTION	NEW YORK MCANDREWS & FORBES	NY 10021	SENATE MID-YEAR REPORT 22JUN89	GENERAL	1,000
PERELMAN, RONALD O KERRY FOR SENATE IN 90 COMMITTEE 89SEN/005/1067 #064710	CONTRIBUTION	NEW YORK MCANDREWS AND FORBES INC	NY 10021	SENATE MID-YEAR REPORT 21MAR89	PRIMARY	1,000
PERELMAN, RONALD O KERRY FOR SENATE IN 90 COMMITTEE 89SEN/005/1067 #064711	CONTRIBUTION	NEW YORK MCANDREWS AND FORBES INC	NY 10021	SENATE MID-YEAR REPORT 21MAR89	GENERAL	1,000
PERELMAN, RONALD O GLICKMAN FOR CONGRESS COMMITTEE 89HSE/383/0596 #072836	CONTRIBUTION	NEW YORK MACANDREWS & FORBES HOLDING INC	NY 10021	HOUSE MID-YEAR REPORT 26JUN89	PRIMARY	1,000
PERELMAN, RONALD O MR COHEN FOR SENATOR 89SEN/008/0104 #066672	CONTRIBUTION	NEW YORK REVLON INC	NY 10021	SENATE MID-YEAR REPORT 23MAY89	PRIMARY	1,000
PERELMAN, RONALD O MR COHEN FOR SENATOR 89SEN/008/0104 #066673	CONTRIBUTION	NEW YORK REVLON INC	NY 10021	SENATE MID-YEAR REPORT 23MAY89	GENERAL	1,000

CONTRIBUTOR/LENDER/TRANSFERRER REPORTING ENTITY MICROFILM LOCATION	STREET ADDRESS TRANSACTION TYPE	CITY	STATE ZIP REPORT TYPE DATE	TYPE OF FILER ELECTION	AMOUNT
PERELMAN, RONALD O MR FRIENDS OF PHIL GRAMM A/K/A THE TEXAS PRESIDENTIAL GALA 90SEN/004/0876 #305272	CONTRIBUTION	NEW YORK REVLON INC	NY 10021 YEAR-END 21NOV89	SENATE PRIMARY	1,000
PERELMAN, RONALD O MR FRIENDS OF PHIL GRAMM A/K/A THE TEXAS PRESIDENTIAL GALA 90SEN/004/0876 #305273	CONTRIBUTION	NEW YORK REVLON INC	NY 10021 YEAR-END 21NOV89	SENATE GENERAL	1,000
PERELMAN, RONALD O MRS FRIENDS OF PHIL GRAMM A/K/A THE TEXAS PRESIDENTIAL GALA 90SEN/004/0325 #301667	CONTRIBUTION	NEW YORK	NY 10021 YEAR-END 21NOV89	SENATE PRIMARY	1,000
PERELMAN, RONALD O MRS FRIENDS OF PHIL GRAMM A/K/A THE TEXAS PRESIDENTIAL GALA 90SEN/004/0325 #301668	CONTRIBUTION	NEW YORK	NY 10021 YEAR-END 21NOV89	SENATE GENERAL	1,000
PERELMAN, STEVEN G BILL BRADLEY FOR U S SENATE '90 89SEN/008/0753 #149642	CONTRIBUTION	NEW YORK STUDENT	NY 10021 MID-YEAR REPORT 31MAR89	SENATE PRIMARY	1,000
PERELMAN, STEVEN G BILL BRADLEY FOR U S SENATE '90 89SEN/008/0753 #149643	CONTRIBUTION	NEW YORK STUDENT	NY 10021 MID-YEAR REPORT 31MAR89	SENATE GENERAL	1,000

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CONTRIBUTOR/LENDER/TRANSFERRER / REPORTING ENTITY / MICROFILM LOCATION	STREET ADDRESS / TRANSACTION TYPE	CITY	STATE ZIP / REPORT TYPE / DATE	TYPE OF FILER / ELECTION	AMOUNT
RIKLIS, IRA ROUNDTABLE POLITICAL ACTION COMMITTEE 89FEC/604/4417 #127926	CONTRIBUTION	NEW YORK RAPID AMERICAN	NY 10022 MID-YEAR REPORT 28FEB89	NON-PARTY QUALIFIED PRIMARY	2,000
RIKLIS, IRA D MID MANHATTAN POLITICAL ACTION COMMITTEE (MID PAC) 89FEC/605/3631 #125227	CONTRIBUTION	NEW YORK INVESTMENTS	NY 10028 MID-YEAR REPORT 7JUN89	NON-PARTY QUALIFIED PRIMARY	2,500
RIKLIS, M FRIENDS FOR HARRY REID 90SEN/006/0214 #245259	CONTRIBUTION	NEW YORK RAPID AMERICAN CORP	NY 10106 YEAR-END 29NOV89	SENATE PRIMARY	1,000
RIKLIS, M FRIENDS FOR HARRY REID 90SEN/006/0214 #245260	CONTRIBUTION	NEW YORK RAPID AMERICAN CORP	NY 10106 YEAR-END 29NOV89	SENATE GENERAL	1,000
RIKLIS, MESHULAM DEMOCRATIC SENATORIAL CAMPAIGN COMMITTEE 89SEN/003/2049 #004886	CONTRIBUTION	NEW YORK RAPID AMERICAN CORPORATION	NY 10022 MARCH MONTHLY 16FEB89	PARTY QUALIFIED PRIMARY	20,000
RIKLIS, MESHULAM MR CITIZENS FOR BIDEN COMMITTEE-1990 89SEN/006/3766 #132075	CONTRIBUTION	NEW YORK RAPID-AMERICAN CORP	NY 10022 MID-YEAR REPORT 27JAN89	SENATE PRIMARY	1,000
RIKLIS, MESHULAM MR PEOPLE FOR BOSCHWITZ 1990 90SEN/004/2791 #291789	CONTRIBUTION	NEW YORK E-II HOLDING	NY 10022 YEAR-END 26OCT89	SENATE PRIMARY	1,000
RIKLIS, MESHULAM MR PEOPLE FOR BOSCHWITZ 1990 90SEN/004/2791 #291790	CONTRIBUTION	NEW YORK E-II HOLDING	NY 10022 YEAR-END 26OCT89	SENATE GENERAL	1,000
RIKLIS, PIA ZADORA DEMOCRATIC SENATORIAL CAMPAIGN COMMITTEE 89SEN/003/2049 #004888	CONTRIBUTION	NEW YORK P Z PRODUCTIONS	NY 10022 MARCH MONTHLY 16FEB89	PARTY QUALIFIED PRIMARY	20,000
RIKLIS, PIA ZADORA MS CITIZENS FOR BIDEN COMMITTEE-1990 89SEN/006/3766 #132076	CONTRIBUTION	NEW YORK ENTERTAINER	NY 10022 MID-YEAR REPORT 27JAN89	SENATE PRIMARY	1,000

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TRUMP, DONALD FRIENDS FOR HARRY REID 89SEN/005/3274 #059049 CONTRIBUTION		LAS VEGAS TRUMP ENTERPRISES	NV 89109	SENATE MID-YEAR REPORT 14JUN89	PRIMARY	1,000
TRUMP, DONALD FRIENDS FOR HARRY REID 89SEN/005/3274 #059050 CONTRIBUTION		LAS VEGAS TRUMP ENTERPRISES	NV 89109	SENATE MID-YEAR REPORT 14JUN89	GENERAL	1,000
TRUMP, DONALD PEOPLE FOR BOSCHWITZ 1990 89SEN/008/1837 #162396 CONTRIBUTION		NEW YORK THE TRUMP ORGANIZATION	NY 10022	SENATE MID-YEAR REPORT 9JUN89	PRIMARY	1,000
TRUMP, DONALD CAMPAIGN AMERICA 89FEC/617/2810 #191212 CONTRIBUTION		NEW YORK TRUMP ORGANIZATION	NY 10022	NON-PARTY QUALIFIED DECEMBER MONTHLY 13NOV89	PRIMARY	2,000
TRUMP, DONALD SUSAN MOLINARI FOR CONGRESS 90HSE/392/3257 #312691 CONTRIBUTION		NEW YORK DEVELOPER	NY	HOUSE PRE-SPECIAL 6FEB90	PRIMARY	1,000
TRUMP, DONALD J KERRY FOR SENATE IN 90 COMMITTEE 89SEN/005/1116 #065122 CONTRIBUTION		NEW YORK REAL ESTATE DEVELOPER	NY	SENATE MID-YEAR REPORT 21MAR89	PRIMARY	1,000
TRUMP, DONALD J PRESIDENT'S DINNER/AKA 1989 REPUBLICAN SENATE/HOUSE DINNER COMMITTEE 89FEC/604/2133 #071000 CONTRIBUTION		NEW YORK TRUMP ORGANIZATION	NY 10022	PARTY NON-QUALIFIED MID-YEAR REPORT 26MAY89	PRIMARY	5,000
TRUMP, DONALD J COMMITTEE FOR CONGRESSMAN BILL GREEN 89HSE/382/3144 #073674 CONTRIBUTION		NEW YORK TRUMP-EQUITABLE CORP	NY 10022	HOUSE MID-YEAR REPORT 27FEB89	PRIMARY	1,000
TRUMP, DONALD J NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS * 89SEN/006/0884 #099262 MEMO(FILER'S % OF CONTRB GIVEN TO JT FR)		NEW YORK TRUMP ORGANIZATION	NY 10022	PARTY QUALIFIED MID-YEAR REPORT 26MAY89	PRIMARY	2,500
TRUMP, DONALD J NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE CONTRIBUTIONS 89HSE/381/4855 #121535 MEMO(FILER'S % OF CONTRB GIVEN TO JT FR)		NEW YORK TRUMP ORGANIZATION	NY 10022	PARTY QUALIFIED MID-YEAR REPORT 26MAY89	PRIMARY	2,500
TRUMP, DONALD J FUND FOR THE FUTURE COMMITTEE (FKA DANFORTH FOR SENATE CMTE) 90FEC/622/0669 #206292 CONTRIBUTION		NEW YORK INVESTOR	NY 10022	NON-PARTY QUALIFIED YEAR-END 15SEP89	PRIMARY	1,000
TRUMP, DONALD J TED WEISS FOR CONGRESS COMMITTEE 90HSE/388/4555 #218210 CONTRIBUTION		NEW YORK TRUMP ORGANIZATION	NY 10022	HOUSE YEAR-END 28OCT89	PRIMARY	500

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TRUMP, DONALD J FRIENDS OF HOWELL HEFLIN COMMITTEE 90SEN/005/2097 #249976 CONTRIBUTION		NEW YORK THE TRUMP ORGANIZATIONS	NY 10022	SENATE YEAR-END 21DEC89	PRIMARY	1,000
TRUMP, DONALD J LIEBERMAN '94 COMMITTEE 90SEN/004/0018 #269375 CONTRIBUTION		NEW YORK TRUMP ORGANIZATION	NY 10022	SENATE YEAR-END 3NOV89	PRIMARY	1,000
TRUMP, DONALD J MR COHEN FOR SENATOR 89SEN/008/0109 #066701 CONTRIBUTION		NEW YORK THE TRUMP ORGANIZATION	NY 10022	SENATE MID-YEAR REPORT 19MAY89	PRIMARY	1,000
TRUMP, DONALD J MR FRIENDS OF PHIL GRAMM A/K/A THE TEXAS PRESIDENTIAL GALA 89SEN/006/0256 #082948 CONTRIBUTION		NEW YORK THE TRUMP ORGANIZATION	NY 10022	SENATE MID-YEAR REPORT 12JUN89	GENERAL	1,000
TRUMP, DONALD J MR CITIZENS FOR JOE KENNEDY 1988 88HSE/383/3951 #096799 CONTRIBUTION		NEW YORK DEVELOPER	NY 10022	HOUSE MID-YEAR REPORT 10JAN89	PRIMARY	1,000
TRUMP, DONALD J MR PEOPLE FOR PETE DOMENICI (1990) 89SEN/007/2305 #115073 CONTRIBUTION		NEW YORK THE TRUMP ORGANIZATION	NY 10022	SENATE MID-YEAR REPORT 21APR89	PRIMARY	1,000
TRUMP, DONALD J MR CITIZENS FOR ARLEN SPECTER 89SEN/006/3154 #138887 CONTRIBUTION		NEW YORK TRUMP ORGANIZATION	NY 10022	SENATE MID-YEAR REPORT 30MAY89	GENERAL	1,000
TRUMP, DONALD J MR MCCONNELL SENATE COMMITTEE '90 90SEN/001/4486 #219367 CONTRIBUTION		NEW YORK THE TRUMP ORGANIZATION	NY 10022	SENATE YEAR-END 24OCT89	PRIMARY	1,000
TRUMP, DONALD J MR COMMITTEE TO RE-ELECT TOM FOLEY 90HSE/388/4429 #220718 CONTRIBUTION		NEW YORK THE TRUMP ORGANIZATION	NY 10022	HOUSE YEAR-END 20OCT89	PRIMARY	1,000
TRUMP, DONALD J MR LAUTENBERG COMMITTEE 90SEN/002/0021 #281744 CONTRIBUTION		NEW YORK THE TRUMP ORGANIZATION	NY 10022	SENATE YEAR-END 2NOV89	GENERAL	1,000
TRUMP, DONALD J MRS FRIENDS OF PHIL GRAMM A/K/A THE TEXAS PRESIDENTIAL GALA 90SEN/004/0464 #302570 CONTRIBUTION		NEW YORK PRIVATE INVESTOR	NY 10022	SENATE YEAR-END 29DEC89	PRIMARY	1,000
TRUMP, DONALD MR PEOPLE FOR BOSCHWITZ 1990 90SEN/004/2752 #291543 CONTRIBUTION		NEW YORK THE TRUMP ORGANIZATION	NY 10022	SENATE YEAR-END 27DEC89	GENERAL	1,000

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CONTRIBUTOR/LENDER/TRANSFERRER REPORTING ENTITY MICROFILM LOCATION TRANSACTION TYPE	STREET ADDRESS	CITY	STATE ZIP TYPE OF FILER REPORT TYPE DATE	ELECTION	AMOUNT
TRUMP, EDDIE NATIONAL PAC 89FEC/585/4499 #000804 CONTRIBUTION		NEW YORK TRUMP GROUP	NY 10153 NON-PARTY QUALIFIED FEBRUARY MONTHLY 26JAN89	PRIMARY	1,000
TRUMP, EDDIE FRIENDS OF SENATOR D'AMATO '92 89SEN/008/2079 #077616 CONTRIBUTION		NEW YORK THE TRUMP GROUP	NY 10022 SENATE MID-YEAR REPORT 7APR89	GENERAL	1,000
TRUMP, ELIZABETH J MS DEMOCRATIC CONGRESSIONAL CAMPAIGN COMMITTEE INC 89HSE/377/1346 #000025 CONTRIBUTION		NEW YORK	NY 10022 PARTY QUALIFIED FEBRUARY MONTHLY 4JAN89	PRIMARY	15,000
TRUMP, FRED C FRIENDS OF SENATOR D'AMATO '92 90SEN/004/3023 #260302 CONTRIBUTION		BROOKLYN THE TRUMP ORGANIZATION	NY 11223 SENATE YEAR-END 8AUG89	PRIMARY	1,000
TRUMP, FRED C FRIENDS OF SENATOR D'AMATO '92 90SEN/004/3023 #260303 CONTRIBUTION		BROOKLYN THE TRUMP ORGANIZATION	NY 11223 SENATE YEAR-END 8AUG89	GENERAL	1,000
TRUMP, FRED C KERRY FOR SENATE IN 90 COMMITTEE 90SEN/003/1679 #311477 CONTRIBUTION		BROOKLYN THE TRUMP ORGANIZATION	NY 11223 SENATE YEAR-END 18SEP89	PRIMARY	1,000
TRUMP, IVANA FRIENDS OF LARRY PRESSLER 90SEN/004/0214 #307054 CONTRIBUTION		NEW YORK HOUSEWIFE	NY 10022 SENATE YEAR-END 23OCT89	GENERAL	1,000
TRUMP, IVENA FRIENDS OF LARRY PRESSLER 89SEN/007/3085 #113931 CONTRIBUTION		NEW YORK HOUSEWIFE	NY 10022 SENATE MID-YEAR REPORT 5JUN89	PRIMARY	1,000
TRUMP, JULIUS NITA LOWEY FOR CONGRESS 89HSE/383/0154 #074757 CONTRIBUTION		MAMARONECK THE TRUMP GROUP	NY 10543 HOUSE MID-YEAR REPORT 23JUN89	FOR 1988	500
TRUMP, JULIUS FRIENDS OF SENATOR D'AMATO '92 89SEN/008/2078 #077613 CONTRIBUTION		MAMARONECK THE TRUMP GROUP	NY 10543 SENATE MID-YEAR REPORT 27MAR89	GENERAL	1,000
TRUMP, ROBERT S FRIENDS OF SENATOR D'AMATO '92 90SEN/004/3057 #260568 CONTRIBUTION		NEW YORK THE TRUMP ORGANIZATION	NY 10021 SENATE YEAR-END 18DEC89	PRIMARY	1,000
TRUMP, ROBERT S FRIENDS OF SENATOR D'AMATO '92 90SEN/004/3057 #260569 CONTRIBUTION		NEW YORK THE TRUMP ORGANIZATION	NY 10021 SENATE YEAR-END 18DEC89	GENERAL	1,000

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TRUMP, STEPHANIE FRIENDS OF SENATOR D'AMATO '92 89SEN/008/2078 #077614	CONTRIBUTION	MAMARONECK THE TRUMP GROUP	NY 10543 MID-YEAR REPORT 27MAR89	SENATE PRIMARY	1,000

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ANDREAS, B NATIONAL CONCRETE MASONRY ASSOCIATION POLITICAL ACTION COMMITTEE 89FEC/600/1104 #038119 CONTRIBUTION		ROCKY HILLS RAMPF MOLDS INDUSTRIES	NJ	NON-PARTY QUALIFIED MID-YEAR REPORT 28MAR89	PRIMARY	200
ANDREAS, BRENDA L FRIENDS OF BOB GRAHAM COMMITTEE 90SEN/001/3072 #268570 CONTRIBUTION		DECATUR HOUSEWIFE	IL 62521	SENATE YEAR-END 10NOV89	PRIMARY	500
ANDREAS, D I MRS MCCONNELL SENATE COMMITTEE '90 89SEN/006/4162 #134424 CONTRIBUTION		MIAMI BEACH HOUSEWIFE	FL 33154	SENATE MID-YEAR REPORT 15MAY89	PRIMARY	1,000
ANDREAS, D INEZ MICHEL FOR CONGRESS COMMITTEE 90HSE/388/1293 #213767 CONTRIBUTION		MIAMI BARRY UNIVERSITY	FL 33161	HOUSE YEAR-END 6SEP89	PRIMARY	1,000
ANDREAS, D INEZ MRS ILEANA ROS-LEHTINEN FOR CONGRESS 89HSE/380/0992 #145936 CONTRIBUTION		MIAMI SHORES BARRY UNIVERSITY	FL 33161	HOUSE PRE-SPECIAL 3JUL89	PRIMARY	1,000
ANDREAS, D INEZ MRS COMMITTEE TO RE-ELECT JAMIE WHITTEN 90HSE/387/4387 #212528 CONTRIBUTION		MIAMI BEACH HOUSEWIFE	FL 33154	HOUSE YEAR-END 20OCT89	PRIMARY	500
ANDREAS, D INEZ MRS FRIENDS OF BOB GRAHAM COMMITTEE 90SEN/001/3072 #268571 CONTRIBUTION		BAL HARBOUR HOUSEWIFE	FL 33154	SENATE YEAR-END 10NOV89	PRIMARY	500
ANDREAS, D INEZ MRS FRIENDS OF CLAUDINE 90HSE/391/1945 #288505 CONTRIBUTION		MIAMI BEACH HOUSEWIFE	MN 55134	SENATE YEAR-END 30NOV89	PRIMARY	500
ANDREAS, D O CRAIG THOMAS FOR CONGRESS (FKA WYOMING CONGRESSIONAL COMM) 89HSE/379/0975 #027561 CONTRIBUTION		MIAMI BEACH ARCHER DANIELS MIDLAND	FL	HOUSE POST-SPECIAL 25APR89	SPECIAL	1,000
ANDREAS, D O COMMITTEE TO RE-ELECT JAMIE WHITTEN 90HSE/387/4387 #212527 CONTRIBUTION		MIAMI BEACH ADM CO	FL 33154	HOUSE YEAR-END 20OCT89	PRIMARY	500
ANDREAS, D O MICHEL FOR CONGRESS COMMITTEE 90HSE/388/1293 #213764 CONTRIBUTION		DECATUR ADM	IL 62525	HOUSE YEAR-END 6SEP89	PRIMARY	1,000
ANDREAS, D O MR FRIENDS OF PHIL GRAHM A/K/A THE TEXAS PRESIDENTIAL GALA 90SEN/004/0625 #303634 CONTRIBUTION		MIAMI BEACH ARCHER DANIELS	FL 33154	SENATE YEAR-END 25OCT89	PRIMARY	500

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ANDREAS, D O MRS FRIENDS OF PHIL GRAHM A/K/A THE TEXAS PRESIDENTIAL GALA 90SEN/004/0905 #305464 CONTRIBUTION		MIAMI BEACH	FL 33154	SENATE YEAR-END 25OCT89	PRIMARY	500
ANDREAS, DAVID L OTIS FOR US SENATE COMMITTEE 90SEN/005/1143 #269835 CONTRIBUTION		MINNEAPOLIS NATIONAL CITY BANK	MN 55416	SENATE YEAR-END 5DEC89	PRIMARY	500
ANDREAS, DWAYNE D MR NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE CONTRIBUTIONS 90HSE/388/3650 #234256 CONTRIBUTION		DECATUR ARCHER DANIELS MIDLAND COMPANY	IL 62525	PARTY QUALIFIED YEAR-END 30NOV89	PRIMARY	2,500
ANDREAS, DWAYNE MR FRIENDS OF SENATOR CARL LEVIN 90SEN/001/1118 #214023 CONTRIBUTION		MIAMI BEACH ARCHER DANIELS MIDLAND	FL 33154	SENATE YEAR-END 11OCT89	PRIMARY	1,000
ANDREAS, DWAYNE D ARCHER DANIELS MIDLAND COMPANY-ADM PAC 89FEC/605/1465 #114215 CONTRIBUTION		MIAMI BEACH ADM	FL 33154	NON-PARTY QUALIFIED MID-YEAR REPORT 27JAN89	PRIMARY	5,000
ANDREAS, DWAYNE D FUND FOR A DEMOCRATIC MAJORITY 89FEC/605/2943 #118362 CONTRIBUTION		MIAMI BEACH ARCHER DANIELS	FL 62526	NON-PARTY QUALIFIED MID-YEAR REPORT 23JUN89	PRIMARY	1,000
ANDREAS, DWAYNE D DURKIN FOR U S SENATE 90SEN/005/3398 #245641 CONTRIBUTION		DECATUR ARCHER DANIELS MIDLAND	IL 62526	SENATE YEAR-END 20NOV89	PRIMARY	1,000
ANDREAS, DWAYNE D FRIENDS OF BOB GRAHAM COMMITTEE 90SEN/001/3073 #268578 CONTRIBUTION		BAL HARBOUR ARCHER DANIEL MIDLAND	FL 33154	SENATE YEAR-END 10NOV89	PRIMARY	500
ANDREAS, DWAYNE D MR MCCONNELL SENATE COMMITTEE '90 89SEN/006/3986 #133365 CONTRIBUTION		MIAMI BEACH ARCHER DANIELS MIDLAND	FL 33154	SENATE MID-YEAR REPORT 16MAY89	GENERAL	1,000
ANDREAS, DWAYNE D MR REPUBLICAN MAJORITY FUND 89FEC/613/4132 #174085 CONTRIBUTION		BAL HARBOUR ARCHER DANIELS MIDLAND	FL 33154	NON-PARTY QUALIFIED OCTOBER MONTHLY 7SEP89	PRIMARY	5,000
ANDREAS, DWAYNE D MR FRIENDS OF CLAUDINE 90HSE/391/1945 #288506 CONTRIBUTION		DECATUR ARCHER DANIELS MIDLAND	IL 62525	SENATE YEAR-END 30NOV89	PRIMARY	500
ANDREAS, G ALLEN FRIENDS OF BOB GRAHAM COMMITTEE 90SEN/001/3073 #268580 CONTRIBUTION		DECATUR ARCHER DANIEL MIDLAND	IL 62526	SENATE YEAR-END 10NOV89	PRIMARY	500

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ANDREAS, G ALLEN JR MICHEL FOR CONGRESS COMMITTEE 90HSE/388/1288 #213735 CONTRIBUTION		DECATUR ADM	IL 62526 HOUSE YEAR-END 6SEP89	PRIMARY	1,000
ANDREAS, L W HUMPHREY FOR SENATE CAMPAIGN COMMITTEE INC 89SEN/004/2605 #055970 CONTRIBUTION		DECATUR ARCHER DANIELS	IL 62525 SENATE MID-YEAR REPORT 30JUN89	GENERAL	200
ANDREAS, L W HUMPHREY FOR SENATE CAMPAIGN COMMITTEE INC 89SEN/004/2605 #055971 CONTRIBUTION		DECATUR ARCHER DANIELS	IL 62525 SENATE MID-YEAR REPORT 30JUN89	GENERAL	200
ANDREAS, L W MR HUMPHREY FOR SENATE CAMPAIGN COMMITTEE INC 90SEN/001/1947 #283843 CONTRIBUTION REF TO INDIVIDUAL		MANKATO	MN 56001 SENATE YEAR-END 11JUL89	PRIMARY	200-
ANDREAS, LOWELL W DURENBERGER FOR U S SENATE VOLUNTEER COMMITTEE 90SEN/004/3753 #294267 CONTRIBUTION		MANKATO	MN 56001 SENATE YEAR-END 13JUL89	PRIMARY	1,000
ANDREAS, MARTIN L ARCHER DANIELS MIDLAND COMPANY-ADM PAC 89FEC/605/1465 #114217 CONTRIBUTION		DECATUR ADM	IL 62521 NON-PARTY QUALIFIED MID-YEAR REPORT 16FEB89	PRIMARY	5,000
ANDREAS, MARTIN L MICHEL FOR CONGRESS COMMITTEE 90HSE/388/1290 #213749 CONTRIBUTION		DECATUR ADM	IL 62521 HOUSE YEAR-END 6SEP89	PRIMARY	1,000
ANDREAS, MARTIN L FRIENDS OF BOB GRAHAM COMMITTEE 90SEN/001/3073 #268576 CONTRIBUTION		CEDAR RAPIDS ARCHER DANIEL MIDLAND	IA 52401 SENATE YEAR-END 10NOV89	PRIMARY	500
ANDREAS, MARTIN L MR SIMON FOR SENATE 90SEN/006/2153 #310504 CONTRIBUTION		DECATUR	IL 62521 SENATE PRE-PRIMARY 12JAN90	PRIMARY	1,000
ANDREAS, MICHAEL COMMITTEE TO RE-ELECT JAMIE WHITTEN 90HSE/387/4386 #212526 CONTRIBUTION		DECATUR ADM CO	IL 62521 HOUSE YEAR-END 20CT89	PRIMARY	500
ANDREAS, MICHAEL D MICHEL FOR CONGRESS COMMITTEE 90HSE/388/1286 #213728 CONTRIBUTION		MANKATO ARCHER DANIELS MIDLAND CORP	MN 56001 HOUSE YEAR-END 6SEP89	PRIMARY	1,000
ANDREAS, MICHAEL D FRIENDS OF BOB GRAHAM COMMITTEE 90SEN/001/3072 #268573 CONTRIBUTION		DECATUR ARCHER DANIEL MIDLAND	IL 62521 SENATE YEAR-END 10NOV89	PRIMARY	500

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ANDREAS, MICHAEL D MR FRIENDS OF PHIL GRAMM A/K/A THE TEXAS PRESIDENTIAL GALA 90SEN/004/0371 #301966 CONTRIBUTION		DECATUR	IL 62521 SENATE YEAR-END 25OCT89	PRIMARY	500
ANDREAS, SALLY M MICHEL FOR CONGRESS COMMITTEE 90HSE/388/1287 #213729 CONTRIBUTION	HOMEMAKER	DECATUR	IL 62521 HOUSE YEAR-END 6SEP89	PRIMARY	1,000
ANDREAS, SALLY WHITLEY FRIENDS OF BOB GRAHAM COMMITTEE 90SEN/001/3072 #268572 CONTRIBUTION	HOUSEWIFE	DECATUR	IL 62521 SENATE YEAR-END 10NOV89	PRIMARY	500
ANDREAS, TERRY L BILL BRADLEY FOR U S SENATE '90 89SEN/008/0551 #148036 CONTRIBUTION	HOME MANAGER	NEW YORK CITY	NY 10023 SENATE MID-YEAR REPORT 3APR89	PRIMARY	1,000
ANDREAS, TERRY MS FRIENDS OF PHIL GRAMM A/K/A THE TEXAS PRESIDENTIAL GALA 90SEN/004/0473 #302630 CONTRIBUTION		NEW YORK CITY	NY 10023 SENATE YEAR-END 25OCT89	PRIMARY	500
ANDREAS, TONI K MICHEL FOR CONGRESS COMMITTEE 90HSE/388/1293 #213766 CONTRIBUTION	ADM	DECATUR	IL 62526 HOUSE YEAR-END 6SEP89	PRIMARY	1,000
ANDREAS, TONI K FRIENDS OF BOB GRAHAM COMMITTEE 90SEN/001/3073 #268579 CONTRIBUTION	HOUSEWIFE	DECATUR	IL 62526 SENATE YEAR-END 10NOV89	PRIMARY	500

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HUNT, A T MR CONSERVATIVE VICTORY FUND 90FEC/629/2763 #287807 CONTRIBUTION		RUSTON	LA 71270 FEBRUARY MONTHLY 12JAN90	NON-PARTY QUALIFIED PRIMARY	250
HUNT, ALEX T JR MR NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS * 90SEN/002/1833 #274782 CONTRIBUTION		RUSTON	LA 71270 YEAR-END 17JUL89	PARTY QUALIFIED PRIMARY	340
HUNT, ALVIS FRIENDS OF MIKE PARKER FOR CONGRESS 90HSE/390/0986 #269070 CONTRIBUTION	TRUSTMARK NATL BANK	JACKSON	MS 39205 YEAR-END 25OCT89	HOUSE FOR 1988	1,000
HUNT, BARBARA NATIONAL BEER WHOLESALERS' ASSOCIATION POLITICAL ACTION COMMITTEE (NBWA PAC) 89FEC/602/3224 #051995 CONTRIBUTION	BELCROSS BEVERAGE	ELIZABETH CITY	NC 27909 MID-YEAR REPORT 27JUN89	NON-PARTY QUALIFIED PRIMARY	200
HUNT, BETTYE M MRS MCCONNELL SENATE COMMITTEE '90 89SEN/006/4192 #134604 CONTRIBUTION	HUNT TRACTOR INC	LOUISVILLE	KY 40207 MID-YEAR REPORT 9JUN89	SENATE PRIMARY	250
HUNT, BOB FRIENDS OF JOHN TANNER 90HSE/389/4056 #282626 CONTRIBUTION	FARM BUREAU	UNION CITY	TN 38261 YEAR-END 15SEP89	HOUSE PRIMARY	250
HUNT, BONNIE I GENERAL DYNAMICS CORPORATION VOLUNTARY POLITICAL CONTRIBUTION PLAN 89FEC/597/2337 #030122 CONTRIBUTION REF TO INDIVIDUAL		ALTA LOMA	CA 91701 JUNE MONTHLY 23MAY89	NON-PARTY QUALIFIED PRIMARY	84-
HUNT, CAROL S MS MISSOURIANS FOR KIT BOND 1992 90SEN/003/0020 #268968 CONTRIBUTION	SALESPERSON	ST LOUIS	MO 63103 YEAR-END 31AUG89	SENATE PRIMARY	250
HUNT, CAROLINE ROSE MRS FRIENDS OF PHIL GRAMM A/K/A THE TEXAS PRESIDENTIAL GALA 90SEN/004/0957 #305807 CONTRIBUTION	ROSEWOOD PROPERTIES	DALLAS	TX 75201 YEAR-END 30NOV89	SENATE PRIMARY	1,000
HUNT, CAROLINE ROSE MS KENT HANCE SENATE COMMITTEE 89SEN/010/0235 #106580 CONTRIBUTION	ROSEWOOD CORPORATION	DALLAS	TX 75201 MID-YEAR REPORT 21MAR89	SENATE RUNOFF	500 AMENDMENT
HUNT, CAROLINE ROSE MS STEVE BARTLETT CONGRESSIONAL CAMPAIGN COMMITTEE 90HSE/390/4272 #285142 CONTRIBUTION	ROSEWOOD PROPERTIES	DALLAS	TX 75201 YEAR-END 1DEC89	HOUSE PRIMARY	700
HUNT, CHARLES W PEOPLE FOR LIGHTFOOT COMMITTEE INC 89HSE/380/3408 #070017 CONTRIBUTION	FARMER	ATLANTIC	IA 50022 MID-YEAR REPORT 6MAR89	HOUSE PRIMARY	250

INDIVIDUAL CONTRIBUTOR--DATABASE REPORT

CONTRIBUTOR/LENDER/TRANSFERRER / REPORTING ENTITY / MICROFILM LOCATION / TRANSACTION TYPE	STREET ADDRESS	CITY	STATE ZIP / REPORT TYPE / DATE	TYPE OF FILER / ELECTION	AMOUNT
HUNT, CHRISTOPHER FRAZER FOR CONGRESS COMMITTEE 90HSE/391/0405 #263206 CONTRIBUTION		OWINGS US GOVT	MD 20736 YEAR-END 10OCT89	HOUSE PRIMARY	250
HUNT, CHUCK NATIONAL RESTAURANT ASSOCIATION POLITICAL ACTION COMMITTEE 90FEC/625/4348 #243970 CONTRIBUTION		WHITE PLAINS OLLIVERS RESTAURANT CORP	NY 10601 YEAR-END 14NOV89	NON-PARTY QUALIFIED PRIMARY	1,000
HUNT, CLIFFORD J MR NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS * 89SEN/006/1786 #104026 CONTRIBUTION		SEMINOLE	FL 34647 MID-YEAR REPORT 16FEB89	PARTY QUALIFIED PRIMARY	250
HUNT, CLYDE L JR MR HELMS FOR SENATE 90SEN/006/0646 #311945 CONTRIBUTION		GREENSBORO SMALL BUSINESS OWNER	NC 27403 YEAR-END 24JUL89	SENATE PRIMARY AMENDMENT	250
HUNT, CLYDE L SR MR HELMS FOR SENATE 90SEN/006/0646 #311946 CONTRIBUTION		GREENSBORO HUNT AND COMPANY	NC 27410 YEAR-END 24JUL89	SENATE PRIMARY AMENDMENT	250
HUNT, DALE MR FRIENDS OF PHIL GRAMM A/K/A THE TEXAS PRESIDENTIAL GALA 89SEN/006/0220 #082704 CONTRIBUTION		GARWOOD RICE FARMER	TX 77442 MID-YEAR REPORT 16FEB89	SENATE GENERAL	250
HUNT, DALE MR FRIENDS OF PHIL GRAMM A/K/A THE TEXAS PRESIDENTIAL GALA 90SEN/004/0795 #304742 CONTRIBUTION		GARWOOD FARMER	TX 77442 YEAR-END 18AUG89	SENATE GENERAL	250
HUNT, DARYL S MR FRIENDS OF PHIL GRAMM A/K/A THE TEXAS PRESIDENTIAL GALA 90SEN/004/0405 #302183 CONTRIBUTION		KATY NCNB	TX 77450 YEAR-END 18AUG89	SENATE PRIMARY	250
HUNT, DAVID L FRIENDS OF ANTHONY HALL FOR CONGRESS 90HSE/390/1174 #286262 CONTRIBUTION		HOUSTON	TX 77207 YEAR-END 1DEC89	HOUSE RUNOFF	500
HUNT, DAVID L FRIENDS OF ANTHONY HALL FOR CONGRESS 90HSE/390/1205 #286373 CONTRIBUTION		HOUSTON	TX 77207 YEAR-END 8DEC89	HOUSE RUNOFF	500
HUNT, DAVID LAVON FRIENDS OF ANTHONY HALL FOR CONGRESS 89HSE/386/0668 #186749 CONTRIBUTION		HOUSTON	TX 77207 PRE-RUN-OFF 24OCT89	HOUSE SPECIAL	1,000
HUNT, DAVID STERLING AMERICAN MEDICAL ASSOCIATION POLITICAL ACTION COMMITTEE 89FEC/597/1814 #028662 CONTRIBUTION		ROANOKE PHYSICIAN	VA 24016 JUNE MONTHLY 25MAY89	NON-PARTY QUALIFIED PRIMARY	250

CONTRIBUTOR/LENDER/TRANSFERRER STREET ADDRESS CITY STATE ZIP TYPE OF FILER
REPORTING ENTITY REPORT TYPE ELECTION AMOUNT
MICROFILM LOCATION TRANSACTION TYPE DATE

HUNT, DEAN MR — LEXINGTON — KY 40523 — SENATE
MCCONNELL SENATE COMMITTEE '90 — MID-YEAR REPORT — PRIMARY — 1,000
89SEN/006/3984 #133354 CONTRIBUTION — ATTORNEY — 15MAY89

HUNT, DENNIS W — ROSEVILLE — MN 55113 — NON-PARTY QUALIFIED
MINNESOTA TRUCK OPERATORS' NON-PARTISAN COMMITTEE — YEAR-END — PRIMARY — 1,500
90FEC/626/3744 #270426 CONTRIBUTION — HUNT TRUCK LINES INC — 21DEC89

HUNT, DONALD — HINSDALE — IL 60521 — NON-PARTY QUALIFIED
HARRIS GOVERNMENT AFFAIRS FUND (HARRIS TRUST & SAVINGS BANK-SPONSOR) — MID-YEAR REPORT — PRIMARY — 500
89FEC/604/3774 #151512 CONTRIBUTION — HARRIS TRUST & SAVINGS BANK — 2FEB89

HUNT, DONNA — HONOLULU — HI 96821 — NON-PARTY QUALIFIED
BANCORP HAWAII SPECIAL POLITICAL EDUCATION COMMITTEE — MID-YEAR REPORT — PRIMARY — 250
89FEC/602/5087 #060365 CONTRIBUTION — BANK OF HAWAII — 30JUN89

HUNT, DONNA — HONOLULU — HI 96821 — NON-PARTY QUALIFIED
BANCORP HAWAII SPECIAL POLITICAL EDUCATION COMMITTEE — YEAR-END — PRIMARY — 300
90FEC/622/0980 #205456 CONTRIBUTION — BANK OF HAWAII — 31DEC89

HUNT, DOROTHY — NEW YORK — NY 10021 — PARTY NON-QUALIFIED
PRESIDENT'S DINNER/AKA 1989 REPUBLICAN SENATE/HOUSE DINNER COMMITTEE — MID-YEAR REPORT — PRIMARY — 1,500
89FEC/604/2093 #070719 CONTRIBUTION — 31MAY89

HUNT, DOROTHY — NEW YORK — NY 10021 — PARTY QUALIFIED
NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS * — MID-YEAR REPORT — PRIMARY — 750
89SEN/006/0843 #099009 MEMO(FILER'S % OF CONTRB GIVEN TO JT FR) — 31MAY89

HUNT, DOROTHY — NEW YORK — NY 10021 — PARTY QUALIFIED
NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE CONTRIBUTIONS — MID-YEAR REPORT — PRIMARY — 750
89HSE/381/4814 #121282 MEMO(FILER'S % OF CONTRB GIVEN TO JT FR) — 31MAY89

HUNT, DOROTHY S — ROCKWELL CITY — IA 50579 — PARTY QUALIFIED
REPUBLICAN PARTY OF IOWA — MID-YEAR REPORT — PRIMARY — 300
89FEC/606/0713 #062766 CONTRIBUTION — HUNT TRUCK LINES INC — 13MAR89

HUNT, E CHARLES — WHITE PLAINS — NY 10601 — NON-PARTY QUALIFIED
NATIONAL RESTAURANT ASSOCIATION POLITICAL ACTION COMMITTEE — MID-YEAR REPORT — PRIMARY — 1,000
89FEC/604/2827 #113166 CONTRIBUTION — OLLIVERS RESTAURANT CORP — 8JUN89

HUNT, E WOODROW MRS — SAN DIEGO — CA 92122 — PARTY QUALIFIED
NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS * — YEAR-END — PRIMARY — 270
90SEN/002/1832 #274781 CONTRIBUTION — 26JUL89

HUNT, GERT — ATLANTIC — IA 50022 — HOUSE
PEOPLE FOR LIGHTFOOT COMMITTEE INC — MID-YEAR REPORT — PRIMARY — 250
89HSE/380/3408 #070020 CONTRIBUTION — FARMER — 6MAR89

CONTRIBUTOR/LENDER/TRANSFERRER / REPORTING ENTITY / MICROFILM LOCATION / TRANSACTION TYPE	STREET ADDRESS	CITY	STATE ZIP / REPORT TYPE / DATE	TYPE OF FILER / ELECTION	AMOUNT
HUNT, GERTRUDE TAUKE FOR SENATE COMMITTEE 90SEN/005/3293 #291215 CONTRIBUTION		ATLANTIC	IA 50022 YEAR-END 11JUL89	SENATE PRIMARY	500
HUNT, GRANT J JR MR WALLY HERGER FOR CONGRESS COMMITTEE 90HSE/388/1506 #270762 CONTRIBUTION		CALISTOGA CONSULTANT	CA 94515 YEAR-END 3NOV89	HOUSE PRIMARY	250
HUNT, H L MRS STEVE BARTLETT CONGRESSIONAL CAMPAIGN COMMITTEE 89HSE/383/3431 #122166 CONTRIBUTION		DALLAS HOMEMAKER	TX 75202 MID-YEAR REPORT 3APR89	HOUSE PRIMARY	1,000
HUNT, H L MRS KENT HANCE SENATE COMMITTEE 89SEN/010/0235 #186581 CONTRIBUTION		DALLAS	TX 75202 MID-YEAR REPORT 4MAY89	SENATE PRIMARY AMENDMENT	1,000
HUNT, H L MRS KENT HANCE SENATE COMMITTEE 89SEN/010/0235 #186582 CONTRIBUTION		DALLAS	TX 75202 MID-YEAR REPORT 4MAY89	SENATE RUNOFF AMENDMENT	1,000
HUNT, HAROLD FRANK MR NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE CONTRIBUTIONS 90HSE/388/3267 #233660 CONTRIBUTION		YUBA CITY BSI ITT	CA 95991 YEAR-END 16OCT89	PARTY QUALIFIED PRIMARY	250
HUNT, HOUSTON MR HELMS FOR SENATE 89SEN/007/2069 #118966 CONTRIBUTION		DALLAS	TX 75201 MID-YEAR REPORT 15MAY89	SENATE PRIMARY	1,000
HUNT, HUGH UNITED STATES TELEPHONE ASS'N PAC (FORMERLY-UNITED STATES INDEPENDENT TELEPHONE ASS'N PAC) 89FEC/598/0022 #033532 CONTRIBUTION		BLAIR HUNTEL SYSTEMS	NE 68008 JUNE MONTHLY 4MAY89	NON-PARTY QUALIFIED PRIMARY	1,000
HUNT, HUGH UNITED STATES TELEPHONE ASS'N PAC (FORMERLY-UNITED STATES INDEPENDENT TELEPHONE ASS'N PAC) 90FEC/631/3092 #318531 CONTRIBUTION		BLAIR HUNTEL SYSTEMS INC	NE 68008 MARCH MONTHLY 6FEB90	NON-PARTY QUALIFIED PRIMARY	1,000
HUNT, JAMES PEOPLE FOR LIGHTFOOT COMMITTEE INC 89HSE/380/3408 #070019 CONTRIBUTION		ATLANTIC FARMER	IA 50022 MID-YEAR REPORT 6MAR89	HOUSE PRIMARY	250
HUNT, JAMES B JR TERRY SANFORD FOR U S SENATE 89SEN/008/2381 #077159 CONTRIBUTION		LUCAMA POYNER & SPRUILL	NC 27851 MID-YEAR REPORT 14MAR89	SENATE PRIMARY	250
HUNT, JAMES B JR STEVE NEAL FOR CONGRESS 90HSE/389/0940 #287907 CONTRIBUTION		RALEIGH POYNER & SPRUILL	NC 27605 YEAR-END 20NOV89	HOUSE PRIMARY	500

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HUNT, JAMES B JR PRICE FOR CONGRESS COMMITTEE 90HSE/391/2139 #298062 CONTRIBUTION		LUCAMA POYNER AND SPRUILL	NC 27851	HOUSE YEAR-END 9NOV89	PRIMARY	500
HUNT, JAMES B JR BILL BRADLEY FOR U S SENATE '90 90SEN/004/1991 #313913 CONTRIBUTION		LUCAMA POYNER & SPRUILL	NC 27851	SENATE YEAR-END 24OCT89	PRIMARY	250
HUNT, JAMES E TAUKE FOR SENATE COMMITTEE 90SEN/005/3213 #290797 CONTRIBUTION		ATLANTIC FARMER	IA 50022	SENATE YEAR-END 11JUL89	PRIMARY	500
HUNT, JOANNE J MRS CALIFORNIANS FOR SENATOR PETE WILSON 89SEN/007/2875 #155966 CONTRIBUTION		CORONA DEL MAR HOUSEWIFE	CA 92625	SENATE MID-YEAR REPORT 15MAR89	FOR 1988	250
HUNT, JOHN C MR COHEN FOR SENATOR 90SEN/004/3262 #263841 CONTRIBUTION		ATLANTA INVESTOR	GA 30327	SENATE YEAR-END 8NOV89	PRIMARY	1,000
HUNT, JOHN E SR BILL GRANT CAMPAIGN FUND 90HSE/390/2539 #257709 CONTRIBUTION		TALLAHASSEE HUNT INSURANCE GROUP INC	FL 32308	HOUSE YEAR-END 7DEC89	PRIMARY	1,000
HUNT, JOHN F MR MCCONNELL SENATE COMMITTEE '90 89SEN/006/4114 #134135 CONTRIBUTION		HANSON MIDWEST COAL HANDLING	KY 42413	SENATE MID-YEAR REPORT 26MAY89	PRIMARY	1,000
HUNT, JOHN JR VOICE OF TEACHERS FOR EDUC/CMTE ON POL EDUC OF NY STATE UNTD TEACHERS (VOTE/COPE) OF NYSUT 90FEC/626/1417 #238559 CONTRIBUTION		SAYVILLE TEACHER	NY 11782	NON-PARTY QUALIFIED YEAR-END 31DEC89	PRIMARY	260
HUNT, JOHN T JR MR COHEN FOR SENATOR 90SEN/004/3244 #263728 CONTRIBUTION		ORLAND PARK CHICAGO RESEARCH TRADI	IL 60462	SENATE YEAR-END 25SEP89	PRIMARY	1,000
HUNT, JOHN T JR MR COHEN FOR SENATOR 90SEN/004/3244 #263729 CONTRIBUTION		ORLAND PARK CHICAGO RESEARCH TRADI	IL 60462	SENATE YEAR-END 25SEP89	GENERAL	1,000
HUNT, JOSEPH J MR GEPHARDT IN CONGRESS COMMITTEE 90HSE/389/1961 #267142 CONTRIBUTION		WASHINGTON IRON WORKERS INTL UNION	DC 20006	HOUSE YEAR-END 20CT89	PRIMARY	500
HUNT, LAMAR JACK KEMP FOR PRESIDENT 89FEC/593/5187 #168743 CONTRIBUTION REF TO INDIVIDUAL		DALLAS	TX 75229	PRESIDENTIAL OCTOBER QUARTERLY 18SEP89	PRIMARY	1,000

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HUNT, LAURA B PRESIDENT'S DINNER/AKA 1989 REPUBLICAN SENATE/HOUSE DINNER COMMITTEE 89FEC/604/2093 #070720 CONTRIBUTION		DALLAS	TX 75205 PARTY NON-QUALIFIED MID-YEAR REPORT 12JUN89	PRIMARY	4,500
HUNT, LAURA B NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS * 89SEN/006/0844 #099010 MEMO(FILER'S % OF CONTRB GIVEN TO JT FR)		DALLAS	TX 75205 PARTY QUALIFIED MID-YEAR REPORT 12JUN89	PRIMARY	2,250
HUNT, LAURA B NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE CONTRIBUTIONS 89HSE/381/4815 #121283 MEMO(FILER'S % OF CONTRB GIVEN TO JT FR)		DALLAS	TX 75205 PARTY QUALIFIED MID-YEAR REPORT 12JUN89	PRIMARY	2,250
HUNT, LEROY D COMMITTEE TO RE-ELECT CONGRESSMAN LAGOMARSINO 90HSE/387/3526 #208654 CONTRIBUTION		SANTA BARBARA INVESTOR	CA 93111 HOUSE YEAR-END 19OCT89	PRIMARY	250
HUNT, LOUISE M PEOPLE FOR LIGHTFOOT COMMITTEE INC 89HSE/380/3408 #070018 CONTRIBUTION		ATLANTIC FARMER	IA 50022 HOUSE MID-YEAR REPORT 6MAR89	PRIMARY	250
HUNT, LYNN H COBLE FOR CONGRESS '90 89HSE/381/3693 #143395 CONTRIBUTION		HIGH POINT HOUSEWIFE	NC 27263 HOUSE MID-YEAR REPORT 18JAN89	PRIMARY	900
HUNT, MAX NATIONAL CONCRETE MASONRY ASSOCIATION POLITICAL ACTION COMMITTEE 89FEC/600/1100 #038095 CONTRIBUTION		ST CHARLES NORTHFIELD BLOCK CO	IL 60174 NON-PARTY QUALIFIED MID-YEAR REPORT 9MAR89	PRIMARY	200
HUNT, MAX L NATIONAL CONCRETE MASONRY ASSOCIATION POLITICAL ACTION COMMITTEE 90FEC/620/1112 #198934 CONTRIBUTION		ST CHARLES CHICAGO BLOCK CO	IL NON-PARTY QUALIFIED YEAR-END 25OCT89	PRIMARY	400
HUNT, MAX L HASTERT FOR CONGRESS COMMITTEE 90HSE/387/1769 #203444 CONTRIBUTION		ST CHARLES NORTHFIELD BLOCK CO	IL 60174 HOUSE YEAR-END 19JUL89	PRIMARY	250
HUNT, NANCY CRAIG THOMAS FOR CONGRESS (FKA WYOMING CONGRESSIONAL COMM) 89HSE/379/0968 #027519 CONTRIBUTION		DALLAS HOMEMAKER	TX HOUSE POST-SPECIAL 20APR89	SPECIAL	1,000
HUNT, NANCY MARTIN FROST CAMPAIGN COMMITTEE 89HSE/383/1961 #076968 CONTRIBUTION		DALLAS	TX 75202 HOUSE MID-YEAR REPORT 18MAY89	PRIMARY	1,000
HUNT, NANCY MARTIN FROST CAMPAIGN COMMITTEE 89HSE/383/1962 #076969 CONTRIBUTION		DALLAS	TX 75202 HOUSE MID-YEAR REPORT 18MAY89	GENERAL	1,000

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HUNT, PAUL F REALTORS POLITICAL ACTION COMMITTEE 89FEC/607/2730 #137293 CONTRIBUTION		COLUMBUS H E R INC	OH 43209 AUGUST MONTHLY 17JUN89	NON-PARTY QUALIFIED PRIMARY	236
HUNT, PENNY MINNESOTA WOMEN'S CAMPAIGN FUND 89FEC/602/0580 #069905 CONTRIBUTION		MINNEAPOLIS HOMEMAKER	MN 55405 MID-YEAR REPORT 14MAR89	NON-PARTY QUALIFIED PRIMARY	500
HUNT, RANDALL B CHRISTOPHER COX FOR CONGRESS 90HSE/391/1535 #232635 CONTRIBUTION		LAGUNA BEACH QUICKSILVER	CA 92651 YEAR-END 18OCT89	HOUSE PRIMARY	350
HUNT, RAY CRAIG THOMAS FOR CONGRESS (FKA WYOMING CONGRESSIONAL COMM) 89HSE/379/0968 #027517 CONTRIBUTION		DALLAS HUNT OIL	TX POST-SPECIAL 20APR89	HOUSE SPECIAL	1,000
HUNT, RAY L MARTIN FROST CAMPAIGN COMMITTEE 89HSE/383/1961 #076966 CONTRIBUTION		DALLAS HUNT OIL CO	TX 75202 MID-YEAR REPORT 18MAY89	HOUSE PRIMARY	800
HUNT, RAY L MARTIN FROST CAMPAIGN COMMITTEE 89HSE/383/1961 #076967 CONTRIBUTION		DALLAS HUNT OIL CO	TX 75202 MID-YEAR REPORT 18MAY89	HOUSE GENERAL	1,000
HUNT, RAY L JOHNSTON SENATE COMMITTEE 90SEN/003/0703 #222070 CONTRIBUTION		DALLAS HUNT OIL COMPANY	TX 75202 YEAR-END 31AUG89	SENATE PRIMARY	1,000
HUNT, RAY L TERRY SANFORD FOR U S SENATE 90SEN/004/1790 #243353 CONTRIBUTION		DALLAS HUNT OIL COMPANY	TX 75202 YEAR-END 15DEC89	SENATE PRIMARY	1,000
HUNT, RAY L MR STEVE BARTLETT CONGRESSIONAL CAMPAIGN COMMITTEE 89HSE/383/3431 #122168 CONTRIBUTION		DALLAS HUNT OIL COMPANY	TX 75248 MID-YEAR REPORT 17MAR89	HOUSE PRIMARY	1,000
HUNT, RAY L MR KENT HANCE SENATE COMMITTEE 89SEN/010/0235 #186584 CONTRIBUTION		DALLAS HUNT OIL COMPANY	TX 75202 MID-YEAR REPORT 4MAY89	SENATE PRIMARY AMENDMENT	1,000
HUNT, RAY L MR COHEN FOR SENATOR 90SEN/004/3226 #263617 CONTRIBUTION		DALLAS HUNT OIL CO	TX 75202 YEAR-END 25OCT89	SENATE PRIMARY	1,000
HUNT, RAY L MRS STEVE BARTLETT CONGRESSIONAL CAMPAIGN COMMITTEE 89HSE/383/3431 #122167 CONTRIBUTION		DALLAS HOMEMAKER	TX 75248 MID-YEAR REPORT 17MAR89	HOUSE PRIMARY	1,000

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HUNT, RAY L MRS KENT HANCE SENATE COMMITTEE 89SEN/010/0235 #186583 CONTRIBUTION		DALLAS HOUSEWIFE	TX 75202	SENATE MID-YEAR REPORT 4MAY89	RUNOFF	1,000 AMENDMENT
HUNT, RAY L MRS KENT HANCE SENATE COMMITTEE 89SEN/010/0236 #186585 CONTRIBUTION		DALLAS HUNT OIL COMPANY	TX 75202	SENATE MID-YEAR REPORT 4MAY89	RUNOFF	1,000 AMENDMENT
HUNT, RICHARD MR MECLA: MUNICIPAL ELECTIONS CMTE OF LOS ANGELES 89FEC/606/0287 #140224 CONTRIBUTION		LOS ANGELES	CA 90069	NON-PARTY QUALIFIED MID-YEAR REPORT 13MAR89	PRIMARY	1,200
HUNT, RILEY MR SAM NUNN CAMPAIGN COMMITTEE 90SEN/001/2080 #221936 CONTRIBUTION		PERRY WATSON-HUNT ENTERPRISES	GA 31069 PERRY SELF	SENATE YEAR-END 16OCT89	PRIMARY	200
HUNT, ROBERT J MR PEOPLE FOR BOSCHWITZ 1990 90SEN/004/2800 #291845 CONTRIBUTION		PINE CITY HUNT BUS COMPANY	MN 55063	SENATE YEAR-END 16NOV89	PRIMARY	1,000
HUNT, ROY H MR MCCONNELL SENATE COMMITTEE '90 89SEN/006/3919 #132976 CONTRIBUTION		LOUISVILLE HUNT TRAC & EQUIP CO	KY 40207	SENATE MID-YEAR REPORT 15MAY89	GENERAL	1,000
HUNT, ROY R MONTGOMERY COUNTY DEMOCRATIC CENTRAL COMMITTEE 89FEC/603/4347 #054490 CONTRIBUTION		SPENCERVILLE	MD 20868	PARTY QUALIFIED MID-YEAR REPORT 5MAY89	PRIMARY	1,000
HUNT, SAM H BILL BRADLEY FOR U S SENATE '90 90SEN/004/1991 #313912 CONTRIBUTION		GREENVILLE	SC 29604	SENATE YEAR-END 21NOV89	PRIMARY	250
HUNT, SWANEE SEAWELL FOR SENATE INC 89SEN/008/3024 #081277 CONTRIBUTION		DENVER PHILANTHROPIST	CO 80206	SENATE MID-YEAR REPORT 26JUN89	PRIMARY	1,000
HUNT, SWANEE COLORADO DEMOCRATIC WOMEN'S PAC 89FEC/606/2695 #156496 CONTRIBUTION		DENVER PHILANTHROPIST	CO 80206	NON-PARTY NON-QUALIFIED MID-YEAR REPORT 30JUN89	PRIMARY	500
HUNT, SWANEE/ROSARIO KENNEDY FOR CONGRESS EMILY'S LIST 89FEC/610/3308 #167084 EARMARKED INTERMEDIARY OUT				NON-PARTY QUALIFIED POST-SPECIAL 14AUG89	SPECIAL	200
HUNT, SWANEE MS DICK BOND FOR CONGRESS 90HSE/390/2108 #258187 CONTRIBUTION		DENVER COLORADO WOMENS FOUNDATION	CO 80206	HOUSE YEAR-END 90CT89	PRIMARY	1,000

CONTRIBUTOR/LENDER/TRANSFERRER STREET ADDRESS CITY STATE ZIP TYPE OF FILER
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HUNT, TANDY L ROSWELL NM 88201 HOUSE
COMMITTEE TO RE-ELECT CONGRESSMAN STEVE SCHIFF YEAR-END PRIMARY 250
90HSE/390/2653 #235731 CONTRIBUTION HUNT & CURRIER LAW FIRM 15DEC89

HUNT, THOMAS F JR MR BURNSVILLE MN 55337 SENATE
PEOPLE FOR BOSCHWITZ 1990 YEAR-END PRIMARY 500
90SEN/004/2759 #291582 CONTRIBUTION CAPITAL DIVERSIONS 10JUL89

HUNT, THOMAS MD BALTIMORE MD 21212 NON-PARTY QUALIFIED
COMMITTEE FOR QUALITY ORTHOPAEDIC HEALTH CARE INC YEAR-END PRIMARY 200
90FEC/620/2374 #199726 CONTRIBUTION MD 15NOV89

HUNT, TOM BURNSVILLE MN 55337 SENATE
PEOPLE FOR BOSCHWITZ 1990 MID-YEAR REPORT PRIMARY 500
89SEN/008/1876 #162665 CONTRIBUTION CAPITAL DIMENSIONS INC 28JUN89

HUNT, TORRENCE M PITTSBURGH PA 15232 SENATE
PEOPLE FOR JOHN HEINZ COMMITTEE YEAR-END PRIMARY 500
90SEN/001/3281 #250377 CONTRIBUTION ALCOA 23OCT89

HUNT, W L EL PASO TX 79984 HOUSE
COLEMAN FOR CONGRESS MID-YEAR REPORT GENERAL 1,000
89HSE/381/3396 #112475 CONTRIBUTION HUNT BLDG CORP 4APR89

HUNT, W L MR EL PASO TX 79922 SENATE
FRIENDS OF PHIL GRAMM A/K/A THE TEXAS PRESIDENTIAL GALA MID-YEAR REPORT GENERAL 500
89SEN/006/0051 #081547 CONTRIBUTION HUNT BUILDING CORPORATION 27FEB89

HUNT, W L MR EL PASO TX 79922 SENATE
FRIENDS OF PHIL GRAMM A/K/A THE TEXAS PRESIDENTIAL GALA YEAR-END GENERAL 250
90SEN/004/0900 #305428 CONTRIBUTION HUNT BUILDING CORPORATION 29DEC89

HUNT, W L MRS EL PASO TX 79922 SENATE
FRIENDS OF PHIL GRAMM A/K/A THE TEXAS PRESIDENTIAL GALA PRE-PRIMARY PRIMARY 250
90SEN/006/1567 #297577 CONTRIBUTION 1FEB90

HUNT, WALTER S JR DR RALEIGH NC 27612 SENATE
HELMS FOR SENATE MID-YEAR REPORT PRIMARY 500
89SEN/007/2069 #118967 CONTRIBUTION 22FEB89

HUNT, WARD MR DALLAS TX 75245 SENATE
FRIENDS OF PHIL GRAMM A/K/A THE TEXAS PRESIDENTIAL GALA PRE-PRIMARY PRIMARY 500
90SEN/006/1578 #297653 CONTRIBUTION MED CONTROL INC 5FEB90

HUNT, WILLIAM A PENSACOLA FL 32503 NON-PARTY QUALIFIED
ASSOCIATED GENERAL CONTRACTORS POLITICAL ACTION COMMITTEE MAY MONTHLY PRIMARY 1,000
89FEC/595/0651 #021574 CONTRIBUTION GULF ATLANTIC CONSTRS INC 25APR89

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HUNT, WILLIAM G JR FRIENDS OF JIM MATHIS 90HSE/392/2293 #293287 CONTRIBUTION		BROOKSIDE PRUDENTIAL	NJ 07926	HOUSE PRE-PRIMARY 8FEB90	PRIMARY	500
HUNT, WILLIAM J ILLINOIS REPUBLICAN STATE CENTRAL COMMITTEE 89FEC/603/4177 #054440 CONTRIBUTION		SPRINGFIELD MII INC LINCOLN	IL 62703	PARTY QUALIFIED MID-YEAR REPORT 19JUN89	PRIMARY	250
HUNT, WILLIAM J MACHTLEY FOR CONGRESS COMMITTEE 89HSE/381/1046 #096452 CONTRIBUTION		PORTSMOUTH SHORE INS INC	RI 02871	HOUSE MID-YEAR REPORT 11JAN89	GENERAL	250
HUNT, WILLIAM J MR REPUBLICAN NATIONAL COMMITTEE - CONTRIBUTIONS (AKA REPUBLICAN NATIONAL FINANCE COMMITTEE 89FEC/600/2090 #047634 CONTRIBUTION		SPRINGFIELD M I I INC	IL 62707	PARTY QUALIFIED JULY QUARTERLY 23JUN89	PRIMARY	500
HUNT, WILLIAM O JR FRIENDS OF SAM BEARD FOR THE U S SENATE 90SEN/001/0201 #196002 CONTRIBUTION		CHICAGO INVESTMENT BANKER	IL 60610	SENATE YEAR-END 1NOV89	PRIMARY	500
HUNT, WILLIAM R MR FRIENDS OF SENATOR ROCKEFELLER 90SEN/003/0200 #299952 CONTRIBUTION		MOUNDSVILLE REYNOLDS MEMORIAL HOSPITAL INC	WV 26041	SENATE YEAR-END 30DEC89	PRIMARY	250

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KRAVIS, BESSIE NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS * 87SEN/005/4722 0065952 CONTRIBUTION		TULSA HOMEMAKER	OK 74114 PARTY QUALIFIED MID-YEAR REPORT 13JUN87	PRIMARY	1,000
KRAVIS, BESSIE METZENBAUM FOR SENATE- 88 88SEN/007/4175 0301789 CONTRIBUTION		TULSA HOMEMAKER	OK 74114 SENATE APRIL QUARTERLY 11APR88	GENERAL	1,000
KRAVIS, BESSIE METZENBAUM FOR SENATE- 88 88SEN/007/4175 0301790 CONTRIBUTION		TULSA HOMEMAKER	OK 74114 SENATE APRIL QUARTERLY 11APR88	GENERAL	1,000
KRAVIS, BESSIE R GEORGE BUSH FOR PRESIDENT, INC 87FEC/470/0907 0023786 CONTRIBUTION		TULSA SELF-EMPLOYED	OK 74114 PRESIDENTIAL APRIL QUARTERLY 12AUG86	PRIMARY	750
KRAVIS, BESSIE R PETE DU PONT FOR PRESIDENT 87FEC/475/5110 0029773 CONTRIBUTION		TULSA HOMEMAKER	OK 74114 PRESIDENTIAL JULY QUARTERLY 30JUL87	PRIMARY	1,000
KRAVIS, BESSIE R GEORGE BUSH FOR PRESIDENT INC COMPLIANCE 87FEC/488/4605 0125643 CONTRIBUTION REF TO INDIVIDUAL		PALM BEACH	FL 33480 PRESIDENTIAL OCTOBER QUARTERLY 17AUG87	GENERAL	250-
KRAVIS, BESSIE R JACK KEMP FOR PRESIDENT 88FEC/506/5023 0211184 CONTRIBUTION		TULSA	OK 74114 PRESIDENTIAL FEBRUARY MONTHLY 25JAN88	PRIMARY	1,000
KRAVIS, BESSIE R FRIENDS OF JIM INHOFE 88HSE/366/1397 0614334 CONTRIBUTION		TULSA HOMEMAKER	OK 74114 HOUSE PRE-GENERAL 14OCT88	GENERAL	800
KRAVIS, BESSIE R MS HERB KOHL FOR UNITED STATES SENATE INC 88SEN/015/2402 0498751 CONTRIBUTION		TULSA HOMEMAKER	OK 74114 SENATE PRE-PRIMARY 28JUL88	PRIMARY	1,000
KRAVIS, CAROLYNE MOYNIHAN COMMITTEE INC 88SEN/012/2181 0449419 CONTRIBUTION		NEW YORK HOUSEWIFE	NY 10021 SENATE JULY QUARTERLY 23JUY88	PRIMARY	711
KRAVIS, CAROLYNE MRS GEORGE BUSH FOR PRESIDENT, INC 87FEC/488/2817 0105913 CONTRIBUTION		NEW YORK	NY 10021 PRESIDENTIAL OCTOBER QUARTERLY 7JUL87	PRIMARY	1,000
KRAVIS, CAROLYNE R PETE DAWKINS FOR SENATE 88SEN/004/4402 0246712 CONTRIBUTION		NEW YORK FASHION DESIGNR	NY 10021 SENATE YEAR-END 31DEC87	PRIMARY	1,000

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KRAVIS, CAROLYNE R PETE DAWKINS FOR SENATE 88SEN/004/4403 0246713 CONTRIBUTION		NEW YORK FASHION DESIGNR	NY 10021 SENATE YEAR-END 31DEC87	PRIMARY	1,000
KRAVIS, GEORGE PETER HOAGLAND FOR CONGRESS COMMITTEE 88HSE/367/0530 0638616 CONTRIBUTION		OMAHA KUTAK ROCK	NE 68102 HOUSE PRE-GENERAL 11OCT88	GENERAL	500
KRAVIS, HEDI 500 CLUB 88FEC/567/3428 0622908 CONTRIBUTION		NEW YORK DESIGN	NY 10028 NON-PARTY QUALIFIED POST-GENERAL 20NOV88	PRIMARY	500
KRAVIS, HELENE DIANE MS 500 CLUB 88FEC/498/1892 0165699 CONTRIBUTION		NEW YORK DESIGN	NY 10028 NON-PARTY QUALIFIED YEAR-END 31DEC87	PRIMARY	500
KRAVIS, HELENE DIANE S PETE DAWKINS FOR SENATE 88SEN/018/3970 0534494 CONTRIBUTION		NEW YORK	NY 10028 SENATE OCTOBER QUARTERLY 7SEP88	GENERAL	500
KRAVIS, HELENE S PETE DU PONT FOR PRESIDENT 87FEC/475/5110 0039774 CONTRIBUTION		NEW YORK	NY 10028 PRESIDENTIAL JULY QUARTERLY 11MAY87	PRIMARY	500
KRAVIS, HENRY MOYNIHAN COMMITTEE INC 88SEN/004/1653 0253653 CONTRIBUTION		NEW YORK KOHLBERG KRAVIS	NY 10021 SENATE YEAR-END 30DEC87	PRIMARY	711
KRAVIS, HENRY MOYNIHAN COMMITTEE INC 88SEN/004/1653 0253654 CONTRIBUTION		NEW YORK KOHLBERG KRAVIS	NY 10021 SENATE YEAR-END 30DEC87	GENERAL	289
KRAVIS, HENRY MOYNIHAN COMMITTEE INC 88SEN/007/3036 0339991 CONTRIBUTION		NEW YORK KOHLBERG KRAVIS	NY 10021 SENATE APRIL QUARTERLY 14APR88	GENERAL	711
KRAVIS, HENRY VICTORY '88 COMMITTEE 88FEC/561/5439 0541910 CONTRIBUTION			PARTY QUALIFIED PRE-GENERAL 4OCT88	PRIMARY	1,000
KRAVIS, HENRY MR 500 CLUB 88FEC/498/1890 0165687 CONTRIBUTION		NEW YORK KOLBERG KRAVIS	NY 10021 NON-PARTY QUALIFIED YEAR-END 14JUL87	PRIMARY	500
KRAVIS, HENRY MR METZENBAUM FOR SENATE- 88 88SEN/003/1858 0238392 CONTRIBUTION		NEW YORK INVESTMENT	NY 10021 SENATE YEAR-END 20NOV87	PRIMARY	1,000

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KRAVIS, HENRY MR METZENBAUM FOR SENATE- 88 88SEN/003/1888 8238555 CONTRIBUTION		NEW YORK INVESTMENT BROKER	NY 10021	SENATE YEAR-END 29NOV87	GENERAL	1,00
KRAVIS, HENRY R PETE DU PONT FOR PRESIDENT 87FEC/475/5110 8039775 CONTRIBUTION		NEW YORK NOR	NY 10021	PRESIDENTIAL JULY QUARTERLY 12JUN87	PRIMARY	1,00
KRAVIS, HENRY R DOLE FOR PRESIDENT COMMITTEE INC 87FEC/475/0813 8054882 CONTRIBUTION		NEW YORK	NY 10021	PRESIDENTIAL JULY QUARTERLY 6MAY87	PRIMARY	1,00
KRAVIS, HENRY R GEORGE BUSH FOR PRESIDENT, INC 87FEC/475/1889 8059108 CONTRIBUTION		NEW YORK	NY 10021	PRESIDENTIAL JULY QUARTERLY 14MAY87	PRIMARY	2,00
KRAVIS, HENRY R GEORGE BUSH FOR PRESIDENT, INC 87FEC/488/2620 8111393 CONTRIBUTION		NEW YORK	NY 10021	PRESIDENTIAL OCTOBER QUARTERLY 7JUL87	PRIMARY	1,00
KRAVIS, HENRY R DANFORTH FOR SENATE COMMITTEE 87SEN/006/4007 8149107 CONTRIBUTION		NEW YORK INVESTOR	NY 10019	SENATE MID-YEAR REPORT 30JUN87	PRIMARY	1,00
KRAVIS, HENRY R BILL BRADLEY FOR U S SENATE '90 87SEN/008/2648 8161683 CONTRIBUTION		NEW YORK KOHLBERG, KRAVIS, ROBERTS & CO	NY 10021	SENATE MID-YEAR REPORT 28MAY87	PRIMARY	1,00
KRAVIS, HENRY R FRIENDS OF MAX BAUCUS (1990 CAMPAIGN) 88SEN/001/3062 8227540 CONTRIBUTION		NEW YORK KOHLBERG KRAVIS ROBERTS & COMP	NY 10021	SENATE YEAR-END 29DEC87	PRIMARY	1,00
KRAVIS, HENRY R DANFORTH FOR SENATE COMMITTEE 88SEN/005/3667 8241963 CONTRIBUTION		NEW YORK INVESTOR	NY 10019	SENATE YEAR-END 28DEC87	GENERAL	1,00
KRAVIS, HENRY R PETE DAWKINS FOR SENATE 88SEN/004/4302 8246206 CONTRIBUTION		NEW YORK KOHLBERG KRAVIS ROBE	NY 10019	SENATE YEAR-END 31DEC87	PRIMARY	1,00
KRAVIS, HENRY R PETE DAWKINS FOR SENATE 88SEN/004/4302 8246207 CONTRIBUTION		NEW YORK KOHLBERG KRAVIS ROBE	NY 10019	SENATE YEAR-END 31DEC87	GENERAL	1,00
KRAVIS, HENRY R DUKAKIS FOR PRESIDENT COMMITTEE, INC 88FEC/511/4085 8258229 CONTRIBUTION		NEW YORK KRAVIS & ROBERTS	NY 10021	PRESIDENTIAL MARCH MONTHLY 2FEB88	PRIMARY	1,00

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KRAVIS, HENRY R CALIFORNIANS FOR PETE WILSON 1994 88SEN/004/2143 026P301 CONTRIBUTION		NEW YORK KOHLBERG KRAVIS ROBERTS & COMPANY	NY 10021	SENATE YEAR-END 08DEC87	PRIMARY	1,00
KRAVIS, HENRY R CALIFORNIANS FOR PETE WILSON 1994 88SEN/004/2143 026P302 CONTRIBUTION		NEW YORK KOHLBERG KRAVIS ROBERTS & COMPANY	NY 10021	SENATE YEAR-END 08DEC87	GENERAL	1,00
KRAVIS, HENRY R FUND FOR AMERICA'S FUTURE, INC; THE 88FEC/133/2023 030P335 CONTRIBUTION		NEW YORK KOHLBERG KRAVIS ROBERTS & CO	NY 10021	NON-PARTY QUALIFIED APRIL MONTHLY 21APR88	PRIMARY	5,00
KRAVIS, HENRY R NEW YORK REPUBLICAN COUNTY COMMITTEE 88FEC/320/0050 031P700 CONTRIBUTION		NEW YORK KOHLBERG KRAVIS & ROB	NY	PARTY QUALIFIED APRIL QUARTERLY 23FEB88	PRIMARY	5,00
KRAVIS, HENRY R ENGELEITER FOR SENATE COMMITTEE 88SEN/007/3260 037P750 CONTRIBUTION		NEW YORK	NY	SENATE APRIL QUARTERLY 14MAR88	PRIMARY	1,00
KRAVIS, HENRY R SENATE MAJORITY FUND 88FEC/535/0919 042P681 CONTRIBUTION		NEW YORK KOHLBERG KRAVIS ROBERTS & CO	NY 10021	NON-PARTY QUALIFIED JULY QUARTERLY 24JUN88	PRIMARY	5,00
KRAVIS, HENRY R CHALLENGE '88 88SEN/010/3510 043P364 MEMO(FILER'S I OF CONTRB GIVEN TO JT FR)		NEW YORK KOHLBERG KRAVIS ROBERTS	NY 10021	PARTY QUALIFIED JULY QUARTERLY 1JUN88	PRIMARY	1,00
KRAVIS, HENRY R PEOPLE FOR JOHN HEINZ COMMITTEE 88SEN/011/2526 043P314 CONTRIBUTION		NEW YORK KOHLBERG KRAVIS ROBERTS & CO	NY 10021	SENATE JULY QUARTERLY 11MAY88	GENERAL	1,00
KRAVIS, HENRY R PEOPLE FOR JOHN HEINZ COMMITTEE 88SEN/011/2562 043P481 CONTRIBUTION		NEW YORK KOHLBERG KRAVIS ROBERTS & CO	NY 10021	SENATE JULY QUARTERLY 1JUN88	GENERAL	1,00
KRAVIS, HENRY R/NATIONAL REPUBLICAN SENATORIAL COMMITTEE FRIENDS OF SENATOR DAVID KARNES 88SEN/012/2008 043P144 EARMARKED CONTRIBUTION				SENATE JULY QUARTERLY 7MAY88	GENERAL	1,00
KRAVIS, HENRY R WALLOP SENATE DRIVE, INC 88SEN/013/1085 046P668 CONTRIBUTION		NEW YORK KOHLBERG KRAVIS ROBER	NY	SENATE JULY QUARTERLY 6JUN88	PRIMARY	1,00
KRAVIS, HENRY R RICK MONTOYA FOR UNITED STATES SENATE COMMITTEE 88SEN/013/1332 048P335 CONTRIBUTION		NEW YORK KOHLBERG KRAVIS ROBERTS & CO	NY 10021	SENATE JULY QUARTERLY 24MAY88	PRIMARY	1,00

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KRAVIS, HENRY R NEW JERSEY REPUBLICAN STATE COMMITTEE 88FEC/556/3960 0530561 CONTRIBUTION		NEW YORK GOLDMAN SACHS	NY 10021	PARTY QUALIFIED OCTOBER QUARTERLY 05SEP88	PRIMARY	5,00
KRAVIS, HENRY R ROTH SENATE COMMITTEE 88SEN/020/2397 0574709 CONTRIBUTION		NEW YORK KKR	NY 10021	SENATE PRE-GENERAL 60CT88	GENERAL	1,00
KRAVIS, HENRY R CALIFORNIANS FOR PETE WILSON 1994 88SEN/018/3177 0593232 CONTRIBUTION		NEW YORK KOHLBERG KRAVIS ROBERTS & COMPANY	NY 10021	SENATE OCTOBER QUARTERLY 19SEP88	PRIMARY	1,00
KRAVIS, HENRY R PEOPLE FOR JOHN HEINZ COMMITTEE 88SEN/026/3225 0649649 CONTRIBUTION REF TO INDIVIDUAL		NEW YORK	NY 10021	SENATE POST-GENERAL 27OCT88	GENERAL	1,00
KRAVIS, HENRY R MR JACK KEMP FOR PRESIDENT 87FEC/475/3376 0044163 CONTRIBUTION		NEW YORK	NY 10019	PRESIDENTIAL JULY QUARTERLY 28APR87	PRIMARY	1,00
KRAVIS, HENRY R MR NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS @ 87SEN/006/0421 0075339 CONTRIBUTION		NEW YORK KOHLBERG, KRAVIS, ROBERTS & CO	NY 10019	PARTY QUALIFIED MID-YEAR REPORT 12MAY87	PRIMARY	10,00
KRAVIS, HENRY R MR FUND FOR AMERICA'S FUTURE, INC; THE 87FEC/480/3663 0084995 CONTRIBUTION		NEW YORK	NY 10021	NON-PARTY QUALIFIED MID-YEAR REPORT 15MAY87	PRIMARY	5,00
KRAVIS, HENRY R MR SENATOR LLOYD BENTSEN ELECTION COMMITTEE 87SEN/007/3022 0145625 CONTRIBUTION		NEW YORK KOHLBERG KRAVIS ETA	NY 10019	SENATE MID-YEAR REPORT 21MAY87	PRIMARY	1,00
KRAVIS, HENRY R MR SENATOR LLOYD BENTSEN ELECTION COMMITTEE 88SEN/004/1292 0241136 CONTRIBUTION		NEW YORK KOHLBERG KRAVIS ETA	NY 10021	SENATE YEAR-END 15DEC87	GENERAL	1,00
KRAVIS, HENRY R MR REPUBLICAN NATIONAL COMMITTEE - CONTRIBUTIONS (AKA REPUBLICAN NATIONAL FINANCE COMMITTEE 88FEC/534/3944 0402422 CONTRIBUTION		NEW YORK KOHLBERG KRAVIS ROBERTS & CO	NY 10021	PARTY QUALIFIED JULY QUARTERLY 27JUN88	PRIMARY	10,000
KRAVIS, HENRY R MR NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS @ 88SEN/010/4136 0409860 CONTRIBUTION		NEW YORK GENERAL PARTNER	NY 10019	PARTY QUALIFIED JULY QUARTERLY 20JUN88	PRIMARY	5,00
KRAVIS, HENRY R MR CALIFORNIANS FOR PETE WILSON 1994 88SEN/011/0995 0417194 CONTRIBUTION		NEW YORK INVESTOR	NY 10021	SENATE JULY QUARTERLY 7JUN88	PRIMARY	1,000

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KRAVIS, HENRY R CRANSTON FOR PRESIDENT COMMITTEE INC 87FEC/476/5484 8120687 CONTRIBUTION		NEW YORK KOHLBERT, KRAVIS, ROBERTS & CO	NY 10021 PRESIDENTIAL OCTOBER QUARTERLY 24JUL87	PRIMARY	1,000
KRAVIS, RAYMOND FRIENDS OF JIM INHOFE 88HSE/347/2919 8322815 CONTRIBUTION		TULSA FINANCIAL INVESTOR	OK 74103 HOUSE APRIL QUARTERLY 15MAR88	PRIMARY	500
KRAVIS, RAYMOND F GEORGE BUSH FOR PRESIDENT, INC 87FEC/470/0905 8022761 CONTRIBUTION		TULSA SELF-EMPLOYED	OK 74114 PRESIDENTIAL APRIL QUARTERLY 12AUG86	PRIMARY	750
KRAVIS, RAYMOND F PETE DU PONT FOR PRESIDENT 87FEC/470/0653 8029670 CONTRIBUTION		TULSA OIL & GAS DAVES	OK 74103 PRESIDENTIAL APRIL QUARTERLY 16MAR87	PRIMARY	1,000
KRAVIS, RAYMOND F DOLE FOR PRESIDENT COMMITTEE INC 87FEC/475/0813 8056804 CONTRIBUTION		TULSA SELF EMPLOYED	OK 74114 PRESIDENTIAL JULY QUARTERLY 29MAY87	PRIMARY	1,000
KRAVIS, RAYMOND F GEORGE BUSH FOR PRESIDENT INC COMPLIANCE 87FEC/488/4605 8125644 CONTRIBUTION REF TO INDIVIDUAL		PALM BEACH	FL 33480 PRESIDENTIAL OCTOBER QUARTERLY 17NOV87	GENERAL	250
KRAVIS, RAYMOND F METZENBAUM FOR SENATE- 88 88SEN/007/4175 8301787 CONTRIBUTION		TULSA INVESTOR	OK 74114 SENATE APRIL QUARTERLY 11MAR88	PRIMARY	1,000
KRAVIS, RAYMOND F METZENBAUM FOR SENATE- 88 88SEN/007/4175 8301788 CONTRIBUTION		TULSA INVESTOR	OK 74114 SENATE APRIL QUARTERLY 11MAR88	GENERAL	1,000
KRAVIS, RAYMOND F COMMITTEE TO ELECT HARRY A JOHNSTON II TO CONGRESS 88HSE/346/4257 8330083 CONTRIBUTION		PALM BEACH	FL 33480 HOUSE APRIL QUARTERLY 25MAR88	PRIMARY	500
KRAVIS, RAYMOND F/PEOPLE FOR JOHN HEINZ COMMITTEE NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS * 88SEN/010/4772 8412739 EARMARKED INTERMEDIARY OUT			PARTY QUALIFIED JULY QUARTERLY 20APR88	PRIMARY	1,000
KRAVIS, RAYMOND F/FRIENDS OF CONNIE MACK NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS * 88SEN/010/4793 8412834 EARMARKED INTERMEDIARY OUT			PARTY QUALIFIED JULY QUARTERLY 31MAY88	PRIMARY	1,000
KRAVIS, RAYMOND F/DURENBERGER FOR U S SENATE VOLUNTEER COM NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS * 88SEN/010/4794 8412835 EARMARKED INTERMEDIARY OUT			PARTY QUALIFIED JULY QUARTERLY 31MAY88	PRIMARY	1,000

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KRAVIS, RAYMOND F/FRIENDS FOR SLADE GORTON 1988 NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS * 88SEN/010/4803 0412884 EARMARKED INTERMEDIARY OUT				PARTY QUALIFIED JULY QUARTERLY 93JN88	PRIMARY	1,000
KRAVIS, RAYMOND F/SENATOR CHAFEE COMMITTEE NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS * 88SEN/010/4804 0412885 EARMARKED INTERMEDIARY OUT				PARTY QUALIFIED JULY QUARTERLY 93JN88	PRIMARY	1,000
KRAVIS, RAYMOND F/FRIENDS OF DICK LUGAR NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS * 88SEN/010/4304 0412886 EARMARKED INTERMEDIARY OUT				PARTY QUALIFIED JULY QUARTERLY 93JN88	PRIMARY	1,000
KRAVIS, RAYMOND F DURENBERGER FOR U S SENATE VOLUNTEER COMMITTEE 88SEN/012/2207 0425485 CONTRIBUTION	TULSA COMBUILT MFGC	OK 74103		SENATE JULY QUARTERLY 10JN88	PRIMARY	1,000
KRAVIS, RAYMOND F PEOPLE FOR JOHN HEINZ COMMITTEE 88SEN/011/2259 0430083 CONTRIBUTION	TULSA OIL & GAS INVESTMENT	OK 74103		SENATE JULY QUARTERLY 25APR88	PRIMARY	1,000
KRAVIS, RAYMOND F SENATOR CHAFEE COMMITTEE 88SEN/012/0637 0453219 CONTRIBUTION	TULSA OIL INVESTOR	OK 74102		SENATE JULY QUARTERLY 15JN88	PRIMARY	1,000
KRAVIS, RAYMOND F/NATIONAL REPUBLICAN SENATORIAL COMMITTEE FRIENDS OF CONNIE MACK 88SEN/011/2126 0456706 EARMARKED CONTRIBUTION				SENATE JULY QUARTERLY 7JN88	PRIMARY	1,000
KRAVIS, RAYMOND F MR REPUBLICAN CONGRESSIONAL BOOSTERS CLUB 87FEC/465/2270 0018776 CONTRIBUTION	PALM BEACH OIL & GAS PRODUCER	FL 33480	NON-PARTY QUALIFIED APRIL MONTHLY 6MAR87		PRIMARY	500
KRAVIS, RAYMOND F MR JACK KEMP FOR PRESIDENT 87FEC/475/3376 0044164 CONTRIBUTION	PALM BEACH	FL 33480	PRESIDENTIAL JULY QUARTERLY 4MAR87		PRIMARY	1,000
KRAVIS, RAYMOND F MR NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS * 87SEN/006/0423 0075379 CONTRIBUTION	TULSA OIL & GAS INVESTMENTS	OK 74103	PARTY QUALIFIED MID-YEAR REPORT 9JUN87		PRIMARY	10,000
KRAVIS, RAYMOND F MR OKLAHOMANS FOR BOREN 87SEN/007/0938 0139517 CONTRIBUTION	TULSA RAYMOND F KRAVIS AND ASSOC	OK 74114	SENATE MID-YEAR REPORT 16APR87		PRIMARY	1,000
KRAVIS, RAYMOND F MR REPUBLICAN NATIONAL COMMITTEE - CONTRIBUTIONS (AKA REPUBLICAN NATIONAL FINANCE COMMITTEE 88FEC/501/4352 0175676 CONTRIBUTION	TULSA OWNER	OK 74103	PARTY QUALIFIED YEAR-END 16MAR87		PRIMARY	10,000

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KRAVIS, RAYMOND F MR REPUBLICAN CONGRESSIONAL BOOSTERS CLUB 88FEC/523/0731 8310043 CONTRIBUTION		PALM BEACH RETIRED	FL 33480	NON-PARTY QUALIFIED APRIL MONTHLY 4MAR88	PRIMARY	750
KRAVIS, RAYMOND F MR GEPHARDT FOR PRESIDENT COMMITTEE INC 88FEC/522/0084 8312586 CONTRIBUTION		TULSA	OK 74103	PRESIDENTIAL APRIL MONTHLY 4MAR88	PRIMARY	500
KRAVIS, RAYMOND F MR REPUBLICAN NATIONAL COMMITTEE - CONTRIBUTIONS (AKA REPUBLICAN NATIONAL FINANCE COMMITTEE 88FEC/534/3944 8402423 CONTRIBUTION		TULSA OWNER	OK 74103	PARTY QUALIFIED JULY QUARTERLY 22JUN88	PRIMARY	10,000
KRAVIS, RAYMOND F MR NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS * 88SEN/010/4136 8409861 CONTRIBUTION		TULSA OIL & GAS INVESTMENTS	OK 74103	PARTY QUALIFIED JULY QUARTERLY 8JUN88	PRIMARY	4,000
KRAVIS, RAYMOND F MR FRIENDS OF DICK LUGAR 88SEN/011/0660 8420495 CONTRIBUTION		TULSA - INVESTOR	OK 74103	SENATE JULY QUARTERLY 14JUN88	GENERAL	1,000
KRAVIS, RAYMOND F MR FRIENDS OF PHIL GRAMM 86SEN/014/1947 8443379 CONTRIBUTION		TULSA	OK 74103	SENATE MID-YEAR REPORT 8JUN88	PRIMARY	500
KRAVIS, RAYMOND F MR FRIENDS FOR SLADE GORTON 1988 88SEN/012/2450 8455945 CONTRIBUTION		TULSA SELF-EMPL NRSC EARMARKED	OK 74103	SENATE JULY QUARTERLY 13JUN88	PRIMARY	1,000
KRAVIS, RAYMOND F MRS REPUBLICAN CONGRESSIONAL BOOSTERS CLUB 87FEC/465/2270 8018776 CONTRIBUTION		PALM BEACH OIL & GAS PRODUCER	FL 33480	NON-PARTY QUALIFIED APRIL MONTHLY 4MAR87	PRIMARY	500
KRAVIS, RAYMOND F MRS REPUBLICAN CONGRESSIONAL BOOSTERS CLUB 88FEC/523/0731 8310044 CONTRIBUTION		PALM BEACH RETIRED	FL 33480	NON-PARTY QUALIFIED APRIL MONTHLY 4MAR88	PRIMARY	750
ROEHN KRAVIS, CAROLYNE MS REPUBLICAN NATIONAL COMMITTEE - CONTRIBUTIONS (AKA REPUBLICAN NATIONAL FINANCE COMMITTEE 88FEC/534/4078 8402933 CONTRIBUTION		NEW YORK FASHION DESIGNER	NY 10021	PARTY QUALIFIED JULY QUARTERLY 30JUN88	PRIMARY	10,000

CONTRIBUTOR/LENDER/TRANSFERRER REPORTING ENTITY MICROFILM LOCATION TRANSACTION TYPE	STREET ADDRESS	CITY	STATE ZIP	TYPE OF FILER REPORT TYPE DATE	ELECTION	AMOUNT
PERELMAN, CLAUDIA COMMITTEE FOR DEMOCRATIC OPPORTUNITY 88FEC/564/0921 0589790 CONTRIBUTION		NEW YORK WABC-TV	NY 10021	NON-PARTY QUALIFIED PRE-GENERAL 17OCT88	PRIMARY	2,000
PERELMAN, CLAUDIA C PETE DAWKINS FOR SENATE 88SEN/018/3872 0534054 CONTRIBUTION		NEW YORK WABC	NY 10021	SENATE OCTOBER QUARTERLY 12JUL88	GENERAL	1,000
PERELMAN, CLAUDIA C MRS REPUBLICAN NATIONAL COMMITTEE - CONTRIBUTIONS (AKA REPUBLICAN NATIONAL FINANCE COMMITTEE 88FEC/534/4042 0402799 CONTRIBUTION		NEW YORK CITY WIFE	NY 10153	PARTY QUALIFIED JULY QUARTERLY 30JUN88	PRIMARY	20,000
PERELMAN, CLAUDIA COHEN MRS BIDEN FOR PRESIDENT 87FEC/489/0061 0118709 CONTRIBUTION		NEW YORK	NY 10021	PRESIDENTIAL OCTOBER QUARTERLY 17JUL87	PRIMARY	1,000
PERELMAN, CLAUDIA COHEN MS ALBERT GORE JR FOR PRESIDENT COMMITTEE INC 88FEC/527/1785 0344242 CONTRIBUTION		NEW YORK	NY 10021	PRESIDENTIAL MAY MONTHLY 22APR88	PRIMARY	1,000
PERELMAN, JEFFREY AUCTION MARKETS POLITICAL ACTION COMMITTEE OF THE CHICAGO BOARD OF TRADE A/K/A AMPAC/CBT 88FEC/500/0960 0168648 CONTRIBUTION		CHICAGO TRADER	IL 60614	NON-PARTY QUALIFIED YEAR-END 21JUL87	PRIMARY	500
PERELMAN, JEFFREY VIDMOLA FOR SENATE COMMITTEE 88SEN/018/0532 0520880 CONTRIBUTION		PHILADELPHIA GENERAL REFRACTORIES COMPANY	PA 19106	SENATE OCTOBER QUARTERLY 12JUL88	GENERAL	500
PERELMAN, JEFFREY AUCTION MARKETS POLITICAL ACTION COMMITTEE OF THE CHICAGO BOARD OF TRADE A/K/A AMPAC/CBT 88FEC/567/3585 0627427 CONTRIBUTION		CHICAGO COMMODITY TRADER	IL 60614	NON-PARTY QUALIFIED POST-GENERAL 04DV88	PRIMARY	2,500
PERELMAN, JEFFREY S AUCTION MARKETS POLITICAL ACTION COMMITTEE OF THE CHICAGO BOARD OF TRADE A/K/A AMPAC/CBT 88FEC/500/1011 0168797 CONTRIBUTION		CHICAGO TRADER	IL 60614	NON-PARTY QUALIFIED YEAR-END 17DEC87	PRIMARY	2,000
PERELMAN, JILL MRS GEORGE BUSH FOR PRESIDENT, INC 87FEC/488/2941 0107303 CONTRIBUTION		CARMEL --	IN 46032	PRESIDENTIAL OCTOBER QUARTERLY 15SEP87	PRIMARY	750
PERELMAN, MEL MR GEORGE BUSH FOR PRESIDENT, INC 87FEC/488/2885 0106607 CONTRIBUTION		CARMEL ELI LILLY AND COMPANY	IN 46032	PRESIDENTIAL OCTOBER QUARTERLY 15SEP87	PRIMARY	750
PERELMAN, MEL MR FRIENDS OF DICK LUGAR 88SEN/001/1386 0226370 CONTRIBUTION		CARMEL ELI LILLY	IN 46032	SENATE YEAR-END 15SEP87	PRIMARY	1,000

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CONTRIBUTOR/LENDER/TRANSFERRER REPORTING ENTITY MICROFILM LOCATION TRANSACTION TYPE	STREET ADDRESS	CITY	STATE ZIP TYPE OF FILER REPORT TYPE DATE	ELECTION	AMOUNT
PERELMAN, RONALD MOYNIHAN COMMITTEE INC 87SEN/008/3442 0137967 CONTRIBUTION		NEW YORK REVLON	NY 10021 SENATE MID-YEAR REPORT 29JUN87	PRIMARY	1,000
PERELMAN, RONALD MOYNIHAN COMMITTEE INC 87SEN/008/3442 0137968 CONTRIBUTION		NEW YORK REVLON	NY 10021 SENATE MID-YEAR REPORT 29JUN87	GENERAL	1,000
PERELMAN, RONALD TOM LANTOS FOR CONGRESS COMMITTEE 87HSE/335/1168 0157142 CONTRIBUTION		NEW YORK EXECUTIVE	NY 10021 HOUSE MID-YEAR REPORT 7APR87	PRIMARY	1,000
PERELMAN, RONALD COMMITTEE FOR SAM GIBBONS 88HSE/339/4006 0271234 CONTRIBUTION		NEW YORK CONSOLIDATED CIGAR	NY 10021 HOUSE YEAR-END 17JUN87	PRIMARY	1,000
PERELMAN, RONALD D METZENBAUM FOR SENATE- 88 87SEN/007/0795 0142969 CONTRIBUTION		NEW YORK	NY 10021 SENATE MID-YEAR REPORT 16JUN87	PRIMARY	1,000
PERELMAN, RONALD D COMMITTEE FOR CONGRESSMAN BILL GREEN 87HSE/335/4679 0151180 CONTRIBUTION		NEW YORK MAC ANDREWS & FORBES GROUP	NY 10021 HOUSE MID-YEAR REPORT 13FEB87	FOR 1986	1,000
PERELMAN, RONALD D COMMITTEE FOR CONGRESSMAN BILL GREEN 87HSE/335/4679 0151181 CONTRIBUTION		NEW YORK MAC ANDREWS & FORBES GROUP	NY 10021 HOUSE MID-YEAR REPORT 9MAR87	FOR 1986	1,000
PERELMAN, RONALD D BILL BRADLEY FOR U S SENATE '90 87SEN/008/2675 0162322 CONTRIBUTION		NEW YORK REVLON GROUP	NY 10021 SENATE MID-YEAR REPORT 13FEB87	PRIMARY	1,000
PERELMAN, RONALD D BILL BRADLEY FOR U S SENATE '90 87SEN/008/2675 0162323 CONTRIBUTION		NEW YORK REVLON GROUP	NY 10021 SENATE MID-YEAR REPORT 13FEB87	GENERAL	1,000
PERELMAN, RONALD D PETE DAWKINS FOR SENATE 88SEN/008/1509 0320240 CONTRIBUTION		NEW YORK -- REVLON GROUP INC	NY 10021 SENATE APRIL QUARTERLY 9FEB88	PRIMARY	1,000
PERELMAN, RONALD D PETE DAWKINS FOR SENATE 88SEN/008/1509 0320241 CONTRIBUTION		NEW YORK REVLON GROUP INC	NY 10021 SENATE APRIL QUARTERLY 9FEB88	GENERAL	500
PERELMAN, RONALD D DEMOCRATIC SENATORIAL CAMPAIGN COMMITTEE 88SEN/009/2921 0348752 CONTRIBUTION		NEW YORK REVLON GROUP INC	NY 10021 PARTY QUALIFIED MAY MONTHLY 22APR88	PRIMARY	10,000

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CONTRIBUTOR/LENDER/TRANSFERRER / REPORTING ENTITY / MICROFILM LOCATION / TRANSACTION TYPE	STREET ADDRESS	CITY	STATE ZIP	TYPE OF FILER / REPORT TYPE / DATE	ELECTION	AMOUNT
PERELMAN, RONALD O MCCARTHY FOR U S SENATOR 88SEN/011/1940 0427434 CONTRIBUTION		NEW YORK MAC ANDREWS & FORBES	NY 10021	SENATE JULY QUARTERLY 23MAY88	PRIMARY	1,000
PERELMAN, RONALD O LICHT '88 COMMITTEE 88SEN/012/0788 0428039 CONTRIBUTION		NEW YORK MACANDREWS & FORBES	NY 10021	SENATE JULY QUARTERLY 29APR88	PRIMARY	1,000
PERELMAN, RONALD O CITIZENS FOR ARLEN SPECTER 88SEN/013/3244 0462301 CONTRIBUTION		NEW YORK MACANDREW & FORBES	NY 10021	SENATE MID-YEAR REPORT 16MAY88	PRIMARY	1,000
PERELMAN, RONALD O DUKAKIS FOR PRESIDENT COMMITTEE COMPLIANCE FUND 87FEC/571/2915 0682458 CONTRIBUTION		NEW YORK REVLON INC	NY 10021	PRESIDENTIAL YEAR-END 08DEC88	GENERAL	1,000
PERELMAN, RONALD O MR BIDEN FOR PRESIDENT 87FEC/476/0736 0044044 CONTRIBUTION		NEW YORK MACANDREWS & FORBES GROUP INC	NY 10021	PRESIDENTIAL JULY QUARTERLY 25JUN87	PRIMARY	1,000
PERELMAN, RONALD O MR FRIENDS OF GARY HART-1988 INC 87FEC/476/0317 0059253 CONTRIBUTION		NEW YORK	NY 10021	PRESIDENTIAL JULY QUARTERLY 6MAY87	PRIMARY	1,000
PERELMAN, RONALD O MR GEORGE BUSH FOR PRESIDENT, INC 88FEC/505/1507 0186111 CONTRIBUTION		NEW YORK	NY 10021	PRESIDENTIAL YEAR-END 27OCT87	PRIMARY	500
PERELMAN, RONALD O MR GEPHARDT FOR PRESIDENT COMMITTEE INC 88FEC/506/2336 0189431 CONTRIBUTION		NEW YORK	NY 10021	PRESIDENTIAL YEAR-END 2NOV87	PRIMARY	1,000
PERELMAN, RONALD O MR DOLE FOR PRESIDENT COMMITTEE INC 88FEC/490/0877 0194634 CONTRIBUTION		NEW YORK	NY 10021	PRESIDENTIAL YEAR-END 20NOV87	PRIMARY	500
PERELMAN, RONALD O MR ALBERT GORE JR FOR PRESIDENT COMMITTEE INC 88FEC/527/1785 0344243 CONTRIBUTION		NEW YORK	NY 10021	PRESIDENTIAL MAY MONTHLY 22APR88	PRIMARY	1,000
PERELMAN, RONALD O MR REPUBLICAN NATIONAL COMMITTEE - CONTRIBUTIONS (AKA REPUBLICAN NATIONAL FINANCE COMMITTEE 88FEC/534/4042 0402800 CONTRIBUTION		NEW YORK CITY MACANDREWS & FORBES	NY 10153	PARTY QUALIFIED JULY QUARTERLY 30JUN88	PRIMARY	5,000
PERELMAN, RONALD O MR CALIFORNIANS FOR PETE WILSON 1994 88SEN/011/1157 0417463 CONTRIBUTION		NEW YORK REVLON INC	NY 10021	SENATE JULY QUARTERLY 27JUN88	GENERAL	1,000

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CONTRIBUTOR/LENDER/TRANSFERRER REPORTING ENTITY MICROFILM LOCATION	STREET ADDRESS TRANSACTION TYPE	CITY	STATE ZIP	TYPE OF FILER REPORT TYPE DATE	ELECTION	AMOUNT
PERELMAN, RONALD O MR RIEGLE FOR SENATE IN '88 COMMITTEE 88SEN/012/3295 8420685	CONTRIBUTION	NEW YORK MACANDREWS & FORBES	NY 10021	SENATE JULY QUARTERLY 7MAY88	PRIMARY	1,000

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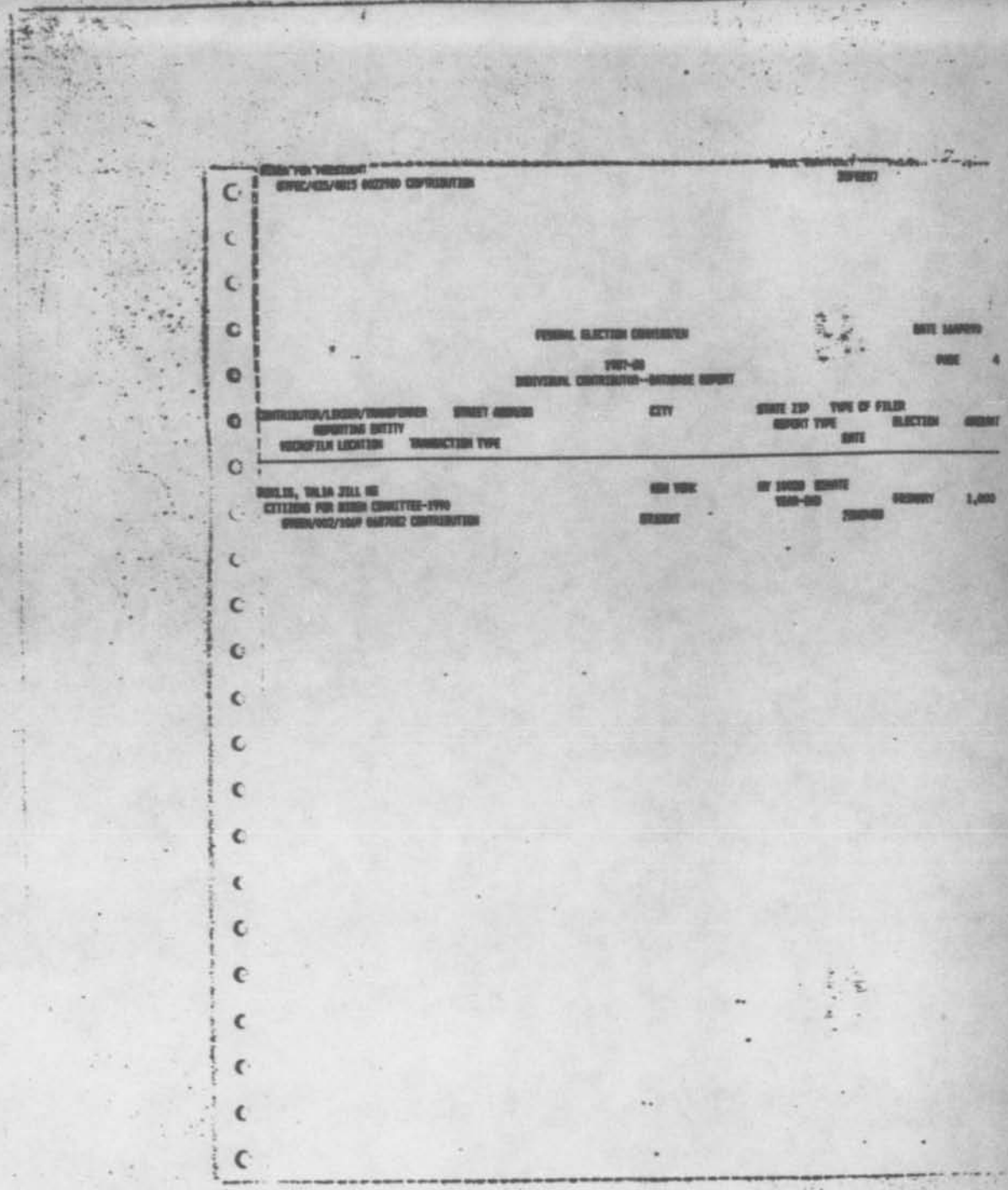

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INDIVIDUAL CONTRIBUTOR--SCHEDULE REPORT

CONTRIBUTOR/LENDER/TRANSFEROR REPORTING ENTITY MICROFILM LOCATION	STREET ADDRESS TRANSACTION TYPE	CITY	STATE ZIP	TYPE OF FILER REPORT TYPE DATE	ELECTION	AMOUNT
BERLIS, TALIA JILL MS CITIZENS FOR BIDEN COMMITTEE-1990 87HSN/H02/10SP 04870E2 CONTRIBUTION		NEW YORK BRONX	NY 10028 1988-SEN 2500488	SENIORITY	PRIMARY	1,000

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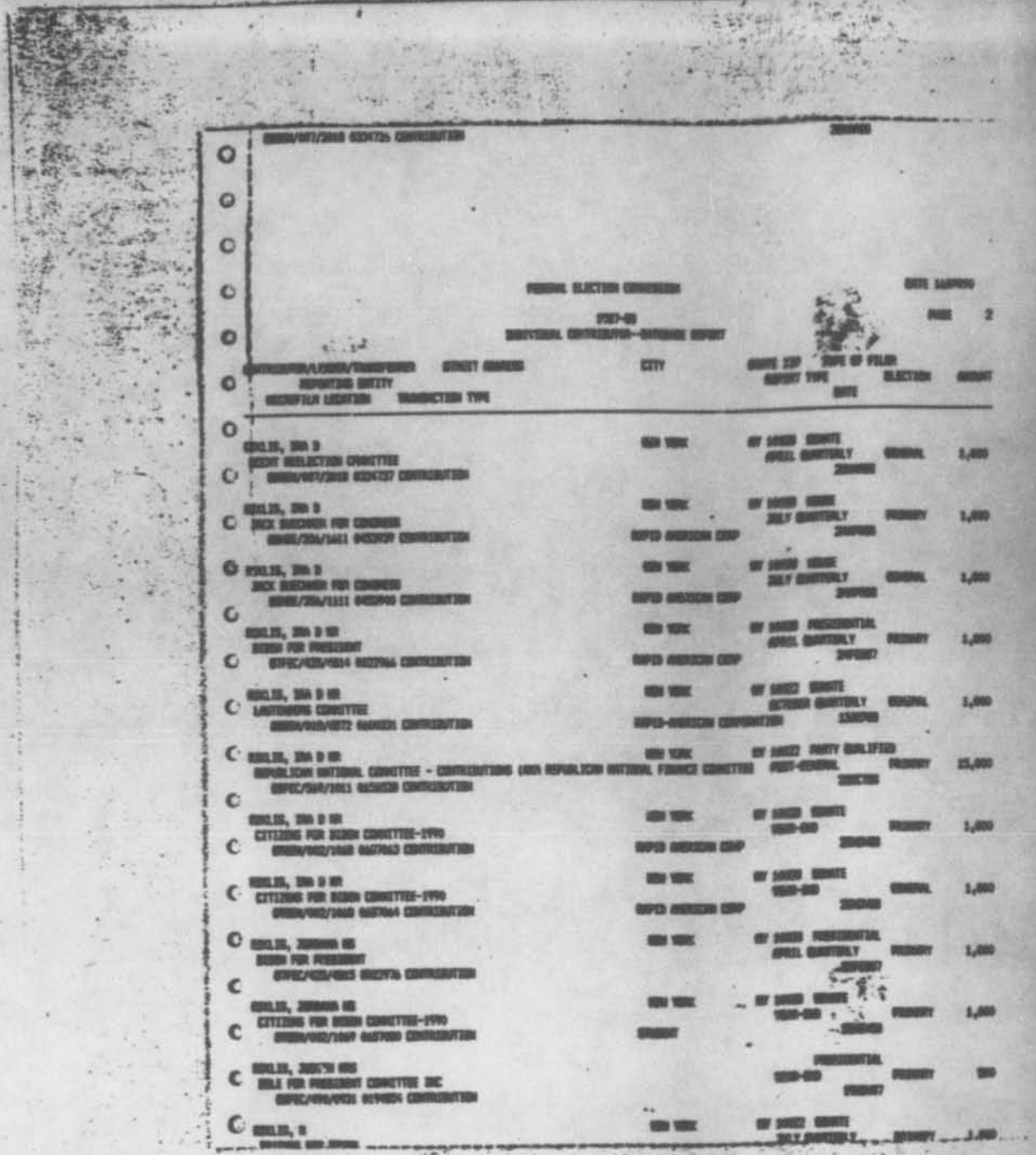
CONTRIBUTOR/LENDER/TRANSFERROR / REPORTING ENTITY / DISBURSEMENT PURPOSE	STREET ADDRESS / TRANSACTION TYPE	CITY	STATE ZIP / REPORT TYPE / DATE	TYPE OF FILER / ELECTION	AMOUNT
KOLIS, KENDALAH COMMITTEE TO RE-ELECT SENATOR EDWARD M KENNEDY 07/08/87 613824 CONTRIBUTION		NEW YORK AMICA MUTUAL INS CO	NY 10022 SENATE 12-DAY REPORT	PRIMARY	1,000
KOLIS, KENDALAH COMMITTEE TO RE-ELECT SENATOR EDWARD M KENNEDY 07/08/87 613824 CONTRIBUTION		NEW YORK AMICA MUTUAL INS CO	NY 10022 SENATE 12-DAY REPORT	GENERAL	1,000
KOLIS, KENDALAH MIGHT REELECTION COMMITTEE 07/08/87 613824 CONTRIBUTION		NEW YORK AMICA MUTUAL INS CO	NY SENATE APRIL QUARTERLY	PRIMARY	1,000
KOLIS, KENDALAH MIGHT REELECTION COMMITTEE 07/08/87 613824 CONTRIBUTION		NEW YORK AMICA MUTUAL INS CO	NY SENATE APRIL QUARTERLY	GENERAL	1,000
KOLIS, KENDALAH MR BIDEN FOR PRESIDENT 07/08/87 613824 CONTRIBUTION		NEW YORK	NY 10022 PRESIDENTIAL APRIL QUARTERLY	PRIMARY	1,000
KOLIS, KENDALAH MR DEMOCRATIC SENATORIAL CAMPAIGN COMMITTEE 07/08/87 613824 CONTRIBUTION		NEW YORK AMICA MUTUAL INSURANCE CO	NY 10022 PARTY QUALIFIED MARCH MONTHLY	PRIMARY	20,000
KOLIS, PIA JOSHUA MS BIDEN FOR PRESIDENT 07/08/87 613824 CONTRIBUTION		NEW YORK AMERIMARK	NY 10022 PRESIDENTIAL APRIL QUARTERLY	PRIMARY	1,000
KOLIS, PIA JOSHUA MS DEMOCRATIC SENATORIAL CAMPAIGN COMMITTEE 07/08/87 613824 CONTRIBUTION		NEW YORK P Z PRODUCTIONS	NY 10022 PARTY QUALIFIED MARCH MONTHLY	PRIMARY	20,000
KOLIS, PRAMODHA MIGHT REELECTION COMMITTEE 07/08/87 613824 CONTRIBUTION		NEW YORK ACMOS	SENATE APRIL QUARTERLY	PRIMARY	1,000
KOLIS, PRAMODHA MIGHT REELECTION COMMITTEE 07/08/87 613824 CONTRIBUTION		NEW YORK ACMOS	SENATE APRIL QUARTERLY	GENERAL	1,000
KOLIS, RIA D ALEXANDER FOR CONGRESS COMMITTEE 07/08/87 613824 CONTRIBUTION		NEW YORK AMICA MUTUAL INSURANCE	NY 10022 HOUSE 12-DAY	PRIMARY	1,000
KOLIS, TALIA JILL MS		NEW YORK	NY 10020 PRESIDENTIAL		



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INDIVIDUAL CONTRIBUTOR--DATABASE REPORT

CONTRIBUTOR/LENDER/TRANSFERER REPORTING ENTITY MICROFILM LOCATION TRANSACTION TYPE	STREET ADDRESS	CITY	STATE ZIP TYPE OF FILER REPORT TYPE DATE	ELECTION	AMOUNT
TRUMP, BLAINE MR GEORGE BUSH FOR PRESIDENT INC COMPLIANCE 88FEC/527/2634 0345410 CONTRIBUTION		NEW YORK CITY	NY 10151 PRESIDENTIAL MAY MONTHLY 15APR88	GENERAL	1,000
TRUMP, BLAINE MRS GEORGE BUSH FOR PRESIDENT, INC 88FEC/505/1129 0183907 CONTRIBUTION		NEW YORK CHRISTIE MANSON & WOODS	NY 10021 PRESIDENTIAL YEAR-END 21OCT87	PRIMARY	500
TRUMP, DONALD WALLOP SENATE DRIVE, INC 88SEN/004/3709 0237716 CONTRIBUTION		NY TRUMP ORGANIZATION	NY 10022 SENATE YEAR-END 19OCT87	PRIMARY	1,000
TRUMP, DONALD BURDICK CAMPAIGN COMMITTEE 88SEN/005/2295 0240862 CONTRIBUTION		NEW YORK THE TRUMP COMPANY	NY 10022 SENATE YEAR-END 2NOV87	PRIMARY	500
TRUMP, DONALD TED WEISS FOR CONGRESS COMMITTEE 88HSE/342/4415 0278659 CONTRIBUTION		NEW YORK SELF-EMPLOYED	NY 10022 HOUSE YEAR-END 1SEP87	PRIMARY	1,000
TRUMP, DONALD MOYNIHAN COMMITTEE INC 88SEN/007/3059 0336126 CONTRIBUTION		NEW YORK TRUMP CONSTRUCTION C	NY 10022 SENATE APRIL QUARTERLY 22MAR88	GENERAL	1,000
TRUMP, DONALD CHUCK DOUGLAS FOR CONGRESS 88HSE/358/4317 0402516 CONTRIBUTION		NEW YORK REAL ESTATE DEVL	NY HOUSE PRE-PRIMARY 4AUG88	PRIMARY	1,000
TRUMP, DONALD DEMOCRATIC CONGRESSIONAL CAMPAIGN COMMITTEE INC 89HSE/375/3980 0482553 CONTRIBUTION REF TO INDIVIDUAL		NEW YORK	NY 10022 PARTY QUALIFIED YEAR-END 30DEC88	PRIMARY	15,000-
TRUMP, DONALD J CRANSTON FOR PRESIDENT COMMITTEE INC 85FEC/332/4497 0001005 CONTRIBUTION		NEW YORK	NY 10022 PRESIDENTIAL APRIL QUARTERLY 23JAN85	PRIMARY	1,000
TRUMP, DONALD J NEW YORK REPUBLICAN COUNTY COMMITTEE 87FEC/481/4143 0093082 CONTRIBUTION		NEW YORK TRUMP CORP	NY 10022 PARTY QUALIFIED MID-YEAR REPORT 16JUL87	PRIMARY	5,000
TRUMP, DONALD J JACK KEMP FOR PRESIDENT 87FEC/488/1423 0105450 CONTRIBUTION		PALM BEACH	FL 33480 PRESIDENTIAL OCTOBER QUARTERLY 15SEP87	PRIMARY	1,000

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TRUMP, DONALD J NEW YORK STATE DEMOCRATIC COMMITTEE-FEDERAL ACCOUNT 87FEC/481/0860 0133299 CONTRIBUTION	NEW YORK TRUMP ORGANIZATION	NY 10022 PARTY QUALIFIED MID-YEAR REPORT 15MAY87	PRIMARY	1,000

CONTRIBUTOR/LENDER/TRANSFERRER REPORTING ENTITY MICROFILM LOCATION TRANSACTION TYPE	STREET ADDRESS	CITY	STATE ZIP TYPE OF FILER REPORT TYPE DATE	ELECTION	AMOUNT
TRUMP, DONALD J NEW YORK STATE DEMOCRATIC COMMITTEE-FEDERAL ACCOUNT 87FEC/481/0860 0133300 CONTRIBUTION		NEW YORK TRUMP ORGANIZATION	NY 10022 PARTY QUALIFIED MID-YEAR REPORT 15MAY87	PRIMARY	1,000
TRUMP, DONALD J COMMITTEE TO RE ELECT UNITED STATES SENATOR PAULA HAWKINS 87SEN/006/1200 0134827 CONTRIBUTION		NEW YORK	NY 10022 SENATE MID-YEAR REPORT 20FEB87	FOR 1986	1,000
TRUMP, DONALD J FRIENDS OF LARRY PRESSLER COMMITTEE 87SEN/009/1610 0146851 CONTRIBUTION		NEW YORK THE TRUMP ORGANIZATION	NY 10022 SENATE MID-YEAR REPORT 12MAY87	GENERAL	1,000
TRUMP, DONALD J DANFORTH FOR SENATE COMMITTEE 87SEN/006/4069 0149372 CONTRIBUTION		NEW YORK TRUMP ORGANIZATION	NY 10022 SENATE MID-YEAR REPORT 18JUN87	PRIMARY	1,000
TRUMP, DONALD J COMMITTEE FOR CONGRESSMAN BILL GREEN 87HSE/335/4683 0151201 CONTRIBUTION		NEW YORK CITY THE TRUMP ORGANIZATION	NY 10022 HOUSE MID-YEAR REPORT 10JUN87	PRIMARY	1,000
TRUMP, DONALD J CITIZENS FOR JOE KENNEDY-86 87HSE/336/2762 0152477 CONTRIBUTION		NEW YORK REAL ESTATE DEVLPR	NY 10022 HOUSE MID-YEAR REPORT 24FEB87	GENERAL	1,000
TRUMP, DONALD J RANGEL FOR CONGRESS COMMITTEE 87HSE/337/2250 0153715 CONTRIBUTION		NEW YORK THE TRUMP ORGANIZATION	NY 10022 HOUSE MID-YEAR REPORT 11JUN87	PRIMARY	1,000
TRUMP, DONALD J CITIZENS FOR TOWNSEND 87HSE/336/1779 0158111 CONTRIBUTION		NEW YORK TRUMP ORGANIZATION	NY 10022 HOUSE MID-YEAR REPORT 24FEB87	GENERAL	500
TRUMP, DONALD J EMPIRE LEADERSHIP FUND 88FEC/500/2146 0169195 CONTRIBUTION		NEW YORK THE TRUMP ORGANIZATION	NY 10022 NON-PARTY QUALIFIED YEAR-END 17SEP87	PRIMARY	2,500
TRUMP, DONALD J BABBITT FOR PRESIDENT COMMITTEE 88FEC/505/5369 0190018 CONTRIBUTION		NEW YORK TRUMP ORGANIZATION	NY 10022 PRESIDENTIAL YEAR-END 30OCT87	PRIMARY	1,000
TRUMP, DONALD J CITIZENS FOR ARLEN SPECTER 88SEN/003/2323 0226448 CONTRIBUTION		NEW YORK TRUMP ORGANIZATION	NY 10022 SENATE YEAR-END 10CT87	PRIMARY	1,000

TRUMP, DONALD J DANFORTH FOR SENATE COMMITTEE 88SEN/005/3723 8242121 CONTRIBUTION	NEW YORK TRUMP ORGANIZATION	NY 10022 SENATE YEAR-END 25NOV87		GENERAL	1,000

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INDIVIDUAL CONTRIBUTOR--DATABASE REPORT

CONTRIBUTOR/LENDER/TRANSFERRER REPORTING ENTITY MICROFILM LOCATION TRANSACTION TYPE	STREET ADDRESS	CITY	STATE ZIP REPORT TYPE DATE	TYPE OF FILER ELECTION	AMOUNT
TRUMP, DONALD J MECHT REELECTION COMMITTEE 88SEN/001/3624 8250752 CONTRIBUTION		NEW YORK THE TRUMP ORGANIZATION	NY 10022 SENATE YEAR-END 25AUG87	PRIMARY	1,000
TRUMP, DONALD J CONGRESSMAN FLOYD H FLAKE CAMPAIGN COMMITTEE 88HSE/342/4618 8253567 CONTRIBUTION		NEW YORK TRUMP ORGANIZATION	NY 10022 HOUSE YEAR-END 2NOV87	PRIMARY	500
TRUMP, DONALD J CONGRESSMAN FLOYD H FLAKE CAMPAIGN COMMITTEE 88HSE/342/4618 8253568 CONTRIBUTION		NEW YORK TRUMP ORGANIZATION	NY 10022 HOUSE YEAR-END 16NOV87	PRIMARY	500
TRUMP, DONALD J RANGEL FOR CONGRESS COMMITTEE 88HSE/341/2381 8275630 CONTRIBUTION		NEW YORK TRUMP ORGANIZATION	NY 10022 HOUSE YEAR-END 13NOV87	GENERAL	1,000
TRUMP, DONALD J FRIENDS OF SENATOR DAVID KARNES 88SEN/007/3194 8325041 CONTRIBUTION		NEW YORK ENTREPRENEUR	NY 10022 SENATE APRIL QUARTERLY 30MAR88	PRIMARY	1,000
TRUMP, DONALD J DEMOCRATIC CONGRESSIONAL CAMPAIGN COMMITTEE INC 88HSE/349/2811 8329635 CONTRIBUTION		NEW YORK TRUMP ORGANIZATION	NY 10022 PARTY QUALIFIED APRIL MONTHLY 24MAR88	PRIMARY	15,000
TRUMP, DONALD J HATCH ELECTION COMMITTEE 88SEN/007/3669 8342568 CONTRIBUTION		NEW YORK THE TRUMP ORGANIZA	NY 10022 SENATE APRIL QUARTERLY 2MAR88	PRIMARY	1,000
TRUMP, DONALD J BROOKLYN DEMOCRATS - FEDERAL CAMPAIGN ACCOUNT 88FEC/536/1595 8423524 CONTRIBUTION		NEW YORK TRUMP ORGANIZATION	NY NON-PARTY QUALIFIED JULY QUARTERLY 09FEB88	PRIMARY	800
TRUMP, DONALD J MCCARTHY FOR U S SENATOR 88SEN/011/1961 8427492 CONTRIBUTION		NEW YORK THE TRUMP ORGANIZATION	NY 10022 SENATE JULY QUARTERLY 24MAY88	PRIMARY	1,000
TRUMP, DONALD J PEOPLE FOR JOHN HEINZ COMMITTEE 88SEN/011/2335 8438453 CONTRIBUTION		NEW YORK THE TRUMP ORGANIZATION	NY 10022 SENATE JULY QUARTERLY 2MAY88	GENERAL	1,000
TRUMP, DONALD J PEOPLE FOR BIDEWARD! 88HSE/334/4800 8453912 CONTRIBUTION		NEW YORK TRUMP CORPORATION	NY 10021 HOUSE JULY QUARTERLY 31MAY88	PRIMARY	1,000

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TRUMP, DONALD J FRIENDS OF CONNIE MACK 88SEN/011/2194 0456968 CONTRIBUTION	PALM BEACH DEVELOPER	FL 33480 SENATE JULY QUARTERLY 24JUN88	PRIMARY	1,000

CONTRIBUTOR/LENDER/TRANSFERRER REPORTING ENTITY MICROFILM LOCATION TRANSACTION TYPE	STREET ADDRESS	CITY	STATE ZIP TYPE OF FILER REPORT TYPE DATE	ELECTION	AMOUNT
TRUMP, DONALD J FRIENDS FOR BRYAN 88SEN/018/0038 0505990 CONTRIBUTION		NEW YORK THE TRUMP ORGANIZATION	NY 10022 SENATE OCTOBER QUARTERLY 30AUG88	PRIMARY	1,000
TRUMP, DONALD J FLORIO '88 COMMITTEE 88HSE/367/2969 0540542 CONTRIBUTION		NEW YORK TRUMP ORGANIZATION	NY 10022 HOUSE PRE-GENERAL 12OCT88	GENERAL	1,000
TRUMP, DONALD J COMMITTEE TO RE-ELECT CLAUDINE SCHNEIDER 88HSE/372/5267 0650254 CONTRIBUTION		NEW YORK TRUMP INDUSTRIES	NY 10022 HOUSE POST-GENERAL 21OCT88	GENERAL	500
TRUMP, DONALD J PETE DAWKINS FOR SENATE 88SEN/026/2187 0660360 CONTRIBUTION		NEW YORK THE TRUMP CORPORATION	NY 10022 SENATE POST-GENERAL 13NOV88	GENERAL	1,000
TRUMP, DONALD J NEW YORK REPUBLICAN COUNTY COMMITTEE 89FEC/578/3241 0674375 CONTRIBUTION REF TO INDIVIDUAL		NEW YORK	NY 10022 PARTY QUALIFIED YEAR-END 21DEC88	PRIMARY	5,000-
TRUMP, DONALD J COMMITTEE TO ELECT HARRY A JOHNSTON II TO CONGRESS 89HSE/374/2391 0693923 CONTRIBUTION		NEW YORK TRUMP ORGANIZATION	NY 10022 HOUSE YEAR-END 13DEC88	GENERAL	500
TRUMP, DONALD J FRIENDS OF SENATOR D'AMATO '92 89SEN/002/2336 0695994 CONTRIBUTION		NEW YORK THE TRUMP ORGANIZATION	NY 10022 SENATE YEAR-END 8DEC88	PRIMARY	1,000
TRUMP, DONALD J MR ALBERT GORE JR FOR PRESIDENT COMMITTEE INC 87FEC/487/0503 0099457 CONTRIBUTION		NEW YORK	NY 10022 PRESIDENTIAL OCTOBER QUARTERLY 24AUG87	PRIMARY	1,000
TRUMP, DONALD J MR PAUL SIMON FOR PRESIDENT 87FEC/488/2352 0111360 CONTRIBUTION		NEW YORK TRUMP ORGANIZATION	NY 10022 PRESIDENTIAL OCTOBER QUARTERLY 11AUG87	PRIMARY	1,000
TRUMP, DONALD J MR DOLE FOR PRESIDENT COMMITTEE INC 87FEC/488/0627 0124339 CONTRIBUTION		NEW YORK TRUMP ORGANIZATION	NY 10022 PRESIDENTIAL OCTOBER QUARTERLY 28AUG87	PRIMARY	1,000
TRUMP, DONALD J MR FRIENDS OF PHIL GRAMM 87SEN/007/1300 0140523 CONTRIBUTION		NEW YORK THE TRUMP ORGANIZATION	NY 10022 SENATE MID-YEAR REPORT 17JAN87	PRIMARY	1,000

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TRUMP, DONALD J MR WEICKER '88 COMMITTEE 88SEN/001/0607 0251241 CONTRIBUTION	NEW YORK THE TRUMP ORGANIZATION	NY 10022	SENATE YEAR-END 6AUG87	PRIMARY	1,000

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INDIVIDUAL CONTRIBUTOR--DATABASE REPORT

CONTRIBUTOR/LENDER/TRANSFERRER REPORTING ENTITY MICROFILM LOCATION TRANSACTION TYPE	STREET ADDRESS	CITY	STATE ZIP	TYPE OF FILER REPORT TYPE DATE	ELECTION	AMOUNT
TRUMP, DONALD J MR CITIZENS FOR JOE KENNEDY 1988 88HSE/341/2237 0273267 CONTRIBUTION		NEW YORK RE DEVL	NY 10022	HOUSE YEAR-END 8DEC87	PRIMARY	1,000
TRUMP, DONALD J MR REPUBLICAN NATIONAL COMMITTEE - CONTRIBUTIONS (AKA REPUBLICAN NATIONAL FINANCE COMMITTEE 88FEC/519/2075 0301258 CONTRIBUTION		NEW YORK THE TRUMP ORGANIZATION	NY 10022	PARTY QUALIFIED APRIL QUARTERLY 25JAN88	PRIMARY	10,000
TRUMP, DONALD J MR BEPHARDT FOR PRESIDENT COMMITTEE INC 88FEC/522/0152 0312924 CONTRIBUTION		JAMAICA	NY 11432	PRESIDENTIAL APRIL MONTHLY 4MAR88	PRIMARY	1,000
TRUMP, DONALD J MR CALIFORNIANS FOR PETE WILSON 1994 88SEN/008/0261 0334360 CONTRIBUTION		NEW YORK THE TRUMP ORGANIZATION	NY 10022	SENATE APRIL QUARTERLY 5FEB88	PRIMARY	1,000
TRUMP, DONALD J MR WEICKER '88 COMMITTEE 88SEN/008/0540 0334892 CONTRIBUTION		NEW YORK	NY 10022	SENATE APRIL QUARTERLY 16FEB88	GENERAL	1,000
TRUMP, DONALD J MR COURTER FOR CONGRESS COMMITTEE 88HSE/354/3824 0455743 CONTRIBUTION		NEW YORK DEVELOPER	NY 10022	HOUSE JULY QUARTERLY 22JUN88	PRIMARY	1,000
TRUMP, DONALD J MR REPUBLICAN NATIONAL COMMITTEE - CONTRIBUTIONS (AKA REPUBLICAN NATIONAL FINANCE COMMITTEE 88FEC/552/1685 0514810 CONTRIBUTION		NEW YORK THE TRUMP ORGANIZATION	NY 10022	PARTY QUALIFIED OCTOBER QUARTERLY 6JUL88	PRIMARY	10,000
TRUMP, DONALD MR RIEGLE FOR SENATE IN '88 COMMITTEE 88SEN/003/0280 0263541 CONTRIBUTION		NEW YORK TRUMP ORGANIZATION	NY 10022	SENATE YEAR-END 4AUG87	PRIMARY	500
TRUMP, DONALD MR GEORGE BUSH FOR PRESIDENT INC COMPLIANCE 88FEC/527/2630 0345390 CONTRIBUTION		NEW YORK CITY DEVELOPER	NY 10151	PRESIDENTIAL MAY MONTHLY 15MAY88	GENERAL	1,000
TRUMP, DONALD MR REPUBLICAN NATIONAL COMMITTEE - CONTRIBUTIONS (AKA REPUBLICAN NATIONAL FINANCE COMMITTEE 89FEC/581/3015 0482611 CONTRIBUTION REF TO INDIVIDUAL		NEW YORK	NY 10022	PARTY QUALIFIED YEAR-END 21DEC88	PRIMARY	10,000
TRUMP, DOROTHY J MRS MISSOURI REPUBLICAN STATE COMMITTEE-FEDERAL COMMITTEE 88FEC/354/5024 0533224 CONTRIBUTION		ST LOUIS	MO 63131	PARTY QUALIFIED OCTOBER QUARTERLY 25AUG88	PRIMARY	500

TRUMP, EDDIE NATIONAL PAC 87FEC/444/1038 0018055 CONTRIBUTION	NEW YORK TRUMP GROUP	NY 10019 NON-PARTY QUALIFIED APRIL MONTHLY 12MAR87	PRIMARY	5,000

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TRUMP, EDDIE FRIENDS OF SENATOR D'AMATO '92 87SEN/008/3513 0227775 CONTRIBUTION		NEW YORK THE TRUMP GROUP	NY 10019 SENATE MID-YEAR REPORT 6MAY87	PRIMARY	1,000
TRUMP, EDDIE DUKAKIS FOR PRESIDENT COMMITTEE, INC 88FEC/522/4709 0337741 CONTRIBUTION		NEW YORK THE TRUMP GROUP	NY 10022 PRESIDENTIAL MAY MONTHLY 30APR88	PRIMARY	1,000
TRUMP, EDDIE MR PAUL SIMON FOR PRESIDENT 87FEC/475/0293 0043737 CONTRIBUTION		NEW YORK TRUMP ORGANIZATION	NY 10022 PRESIDENTIAL JULY QUARTERLY 30JUN87	PRIMARY	1,000
TRUMP, EDDIE MR BIDEN FOR PRESIDENT 87FEC/489/0083 0122981 CONTRIBUTION		NEW YORK TRUMP GROUP	NY 10079 PRESIDENTIAL OCTOBER QUARTERLY 29AUG87	PRIMARY	1,000
TRUMP, ELIZABETH J MS GEPHARDT FOR PRESIDENT COMMITTEE INC 88FEC/522/0152 0312925 CONTRIBUTION		NEW YORK	NY 10021 PRESIDENTIAL APRIL MONTHLY 7MAR88	PRIMARY	1,000
TRUMP, ELIZABETH MRS GEORGE BUSH FOR PRESIDENT INC COMPLIANCE 88FEC/531/1316 0376305 CONTRIBUTION		NEW YORK CHASE MANHATTAN BANK	NY 10021 PRESIDENTIAL JUNE MONTHLY 23MAY88	GENERAL	1,000
TRUMP, FRED MOYNIHAN COMMITTEE INC 87SEN/008/3449 0137804 CONTRIBUTION		NEW YORK TRUMP ORG	NY 10022 SENATE MID-YEAR REPORT 12MAY87	PRIMARY	1,000
TRUMP, FRED C CRANSTON FOR PRESIDENT COMMITTEE INC 85FEC/332/4497 0001006 CONTRIBUTION		BROOKLYN	NY 11223 PRESIDENTIAL APRIL QUARTERLY 23MAR85	PRIMARY	1,000
TRUMP, FRED C PAUL P RAO FOR CONGRESS 88HSE/356/0893 0423849 CONTRIBUTION		BROOKLYN REALTOR	NY 11223 HOUSE JULY QUARTERLY 17NOV88	GENERAL	500
TRUMP, FRED C MR GEORGE BUSH FOR PRESIDENT INC COMPLIANCE 88FEC/527/2632 0345398 CONTRIBUTION		JAMAICA ESTATES	NY 11432 PRESIDENTIAL MAY MONTHLY 15APR88	GENERAL	1,000
TRUMP, IVANA M PETE DAWKINS FOR SENATE 88SEN/026/2267 0660535 CONTRIBUTION		NEW YORK THE TRUMP ORGANIZATION	NY 10022 SENATE POST-GENERAL 13NOV88	GENERAL	1,000

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TRUMP, IVANA MINOWAYR MRS GEORGE BUSH FOR PRESIDENT, INC 88FEC/505/1373 0185331 CONTRIBUTION	NEW YORK	NY 10022 YEAR-END 31OCT87	PRESIDENTIAL	PRIMARY	50(

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TRUMP, IVANA MINOWAYR MS ALBERT GORE JR FOR PRESIDENT COMMITTEE INC 88FEC/517/3623 0297695 CONTRIBUTION		NEW YORK	NY 10022	PRESIDENTIAL APRIL MONTHLY 16APR88	PRIMARY	1,00(
TRUMP, JULIUS NATIONAL PAC 87FEC/466/1838 0018056 CONTRIBUTION	TRUMP GROUP	NEW YORK	NY 10019	NON-PARTY QUALIFIED APRIL MONTHLY 23MAR87	PRIMARY	5,00(
TRUMP, JULIUS DUKAKIS FOR PRESIDENT COMMITTEE, INC 88FEC/490/3405 0177997 CONTRIBUTION	TRUMP CORPORATION	WWWWWWCK	NY 10543	PRESIDENTIAL YEAR-END 17NOV87	PRIMARY	1,00(
TRUMP, JULIUS FRIENDS OF SENATOR D'AMATO '92 88SEN/003/3098 0228368 CONTRIBUTION	TRUMP GROUP	WWWWWWCK	NY 10543	SENATE YEAR-END 23NOV87	PRIMARY	1,00(
TRUMP, JULIUS MR BIDEN FOR PRESIDENT 87FEC/489/0083 0122984 CONTRIBUTION	TRUMP GROUP	NEW YORK	NY 10079	PRESIDENTIAL OCTOBER QUARTERLY 28JUL87	PRIMARY	1,00(
TRUMP, JULIUS MR DOLE FOR PRESIDENT COMMITTEE INC 88FEC/490/1115 0195600 CONTRIBUTION		NEW YORK	NY 10019	PRESIDENTIAL YEAR-END 16DEC87	PRIMARY	1,00(
TRUMP, ROBERT S PETE DAWKINS FOR SENATE 88SEN/004/4399 0244690 CONTRIBUTION	TRUMP ORGANIZATION	NEW YORK	NY 10021	SENATE YEAR-END 31DEC87	PRIMARY	1,00(
TRUMP, ROBERT S FLORIO '88 COMMITTEE 88HSE/267/2968 0540535 CONTRIBUTION	TRUMP ORGANIZATION	NEW YORK	NY 10022	HOUSE PRE-GENERAL 12OCT88	GENERAL	1,00(
TRUMP, ROBERT S PETE DAWKINS FOR SENATE 88SEN/021/3633 0585316 CONTRIBUTION	TRUMP ORGANIZATION	NEW YORK	NY 10021	SENATE PRE-GENERAL 12OCT88	GENERAL	1,00(
TRUMP, ROBERT S MR GEORGE BUSH FOR PRESIDENT, INC 88FEC/505/1322 0185029 CONTRIBUTION	THE TRUMP ORGANIZATION	NEW YORK	NY 10022	PRESIDENTIAL YEAR-END 16DEC87	PRIMARY	1,00(
TRUMP, ROBERT S MR GEORGE BUSH FOR PRESIDENT INC COMPLIANCE 88FEC/527/2643 0345463 CONTRIBUTION		NEW YORK CITY	NY 10151	PRESIDENTIAL MAY MONTHLY 15APR88	GENERAL	1,00(

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CONTRIBUTOR/LENDER/TRANSFERRER REPORTING ENTITY MICROFILM LOCATION TRANSACTION TYPE	STREET ADDRESS	CITY	STATE ZIP TYPE OF FILER REPORT TYPE DATE	ELECTION	AMOUN
ANDREAS, ALLEN JR CITIZENS FOR EDWARD R MADIGAN 88HSE/372/4231 0663958 CONTRIBUTION		DECATUR ADM	IL 62526 HOUSE POST-GENERAL 24OCT88	GENERAL	500
ANDREAS, BRENDA L MRS DOLE FOR PRESIDENT COMMITTEE INC 88FEC/506/4329 0208394 CONTRIBUTION		DECATUR	IL 62521 PRESIDENTIAL FEBRUARY MONTHLY 63AN88	PRIMARY	1,000
ANDREAS, BRENDA L MS PAUL SIMON FOR PRESIDENT 87FEC/488/2210 0107411 CONTRIBUTION		DECATUR ARCHER DANIELS MIDLAND COMPAN CORP	IL 62521 PRESIDENTIAL OCTOBER QUARTERLY 14SEP87	PRIMARY	1,000
ANDREAS, CONRAE COLORADANS FOR DAVID SKAGGS 88HSE/362/0901 0516528 CONTRIBUTION		BOULDER TRAINER & CONSULTANT	CO 80302 HOUSE OCTOBER QUARTERLY 28SEP88	GENERAL	1,000
ANDREAS, CONRAE NATIONAL COMMITTEE FOR AN EFFECTIVE CONGRESS 88FEC/573/1032 0651256 CONTRIBUTION		BOULDER PUBLISHER	CO 80302 NON-PARTY QUALIFIED POST-GENERAL 28OCT88	PRIMARY	250
ANDREAS, D I MRS PAUL SIMON FOR PRESIDENT 87FEC/475/0181 0041753 CONTRIBUTION		MIAMI BEACH BARRY UNIV	FL 33154 PRESIDENTIAL JULY QUARTERLY 31JUL87	PRIMARY	1,000
ANDREAS, D INES MRS BOWKER FOR CONGRESS COMMITTEE 88HSE/343/0755 0271459 CONTRIBUTION		BAL HARBOUR HOUSEWIFE	FL 33154 HOUSE YEAR-END 17DEC87	PRIMARY	1,000
ANDREAS, D INEZ BURNBERGER FOR U S SENATE VOLUNTEER COMMITTEE 87SEN/008/2382 0133359 CONTRIBUTION		BAL HARBOUR	FL 33154 SENATE MID-YEAR REPORT 17MAR87	PRIMARY	1,000
ANDREAS, D INEZ BURDICK CAMPAIGN COMMITTEE 88SEN/005/2280 0240768 CONTRIBUTION		MIAMI BEACH BARRY UNIVERSITY	FL 33154 SENATE YEAR-END 24NOV87	PRIMARY	1,000
ANDREAS, D INEZ WILLIAM LEHMAN CAMPAIGN FUND COMMITTEE 88HSE/347/3000 0341791 CONTRIBUTION		BAL HARBOUR BARRY UNIVERSITY	FL 33154 HOUSE APRIL QUARTERLY 12FEB88	PRIMARY	1,000
ANDREAS, D INEZ DUKAKIS FOR PRESIDENT COMMITTEE, INC		MIAMI BEACH	FL 33154 PRESIDENTIAL JUNE MONTHLY	PRIMARY	1,000

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88FEC/531/0082 0364186 CONTRIBUTION	BARRY UNIVERSITY		29MAY88		
ANDREAS, D INEZ	MIAMI BEACH	FL 33154 HOUSE			
FRIENDS OF JIM MOODY		JULY QUARTERLY		PRIMARY	1,000
88SEN/013/0981 0442931 CONTRIBUTION	HOUSEWIFE		30JUN88		

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ANDREAS, D INEZ		MIAMI BEACH	FL 33154 SENATE		
FRIENDS OF CONNIE MACK			JULY QUARTERLY	PRIMARY	1,000
88SEN/011/2193 0456959 CONTRIBUTION		BARRY UNIVERSITY	22JUL88		
ANDREAS, D INEZ		BAL HARBOR	FL 33154 SENATE		
DURENBERGER FOR U S SENATE VOLUNTEER COMMITTEE			POST-GENERAL	GENERAL	1,000
88SEN/025/0588 0627507 CONTRIBUTION			19NOV88		
ANDREAS, D INEZ		MIAMI BEACH	FL 33154 HOUSE		
GLICKMAN FOR CONGRESS COMMITTEE			PRE-GENERAL	GENERAL	1,000
89HSE/367/0049 0642781 CONTRIBUTION		HOMEMAKER	60CT88		
ANDREAS, D INEZ		MIAMI BEACH	FL 33154 SENATE		
FRIENDS OF CONNIE MACK			POST-GENERAL	GENERAL	1,000
88SEN/026/1246 0647697 CONTRIBUTION		BARRY UNIVERSITY	28OCT88		
ANDREAS, D INEZ MRS		MIAMI BEACH	FL 33154 SENATE		
FRIENDS OF ROBERT C BYRD COMMITTEE			MID-YEAR REPORT	PRIMARY	1,000
87SEN/009/0865 0147490 CONTRIBUTION		BARRY UNIVERSITY	17FEB87		
ANDREAS, D INEZ MRS		DECATUR	IL 62525 HOUSE		
KIKA DE LA GARZA FOR CONGRESS			MID-YEAR REPORT	GENERAL	1,000
87HSE/334/3865 0156634 CONTRIBUTION		CHAIRM BARRY UNIVERSITY	MIAMI SHORE 26FEB87		
ANDREAS, D INEZ MRS		BAL HARBOUR	FL 33154 NON-PARTY QUALIFIED		
WRIGHT APPRECIATION FUND			YEAR-END	PRIMARY	1,000
88HSE/344/1412 0248074 CONTRIBUTION		HOUSEWIFE	78EC87		
ANDREAS, D INEZ MRS		MIAMI BEACH	FL 33154 SENATE		
HECHT REELECTION COMMITTEE			YEAR-END	PRIMARY	1,000
88SEN/001/3625 0250759 CONTRIBUTION		BARRY UNIVERSITY	17SEP87		
ANDREAS, D INEZ MRS		MIAMI BEACH	FL 33154 SENATE		
FRIENDS OF SENATOR DAVID KARNES			YEAR-END	PRIMARY	1,000
88SEN/006/1345 0279114 CONTRIBUTION		BARRY UNIVERSITY	15OCT87		AMENDMENT
ANDREAS, D INEZ MRS		MIAMI BEACH	FL 33154 HOUSE		
COMMITTEE FOR BAM GIBBONS			APRIL QUARTERLY	PRIMARY	1,000
88HSE/346/4340 0333341 CONTRIBUTION		HOUSEWIFE	16MAR88		
ANDREAS, D INEZ MRS		MIAMI BEACH	FL 33154 PRESIDENTIAL		
ALBERT GORE JR FOR PRESIDENT COMMITTEE INC			MAY MONTHLY	PRIMARY	1,000

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88FEC/527/1639 0343829 CONTRIBUTION — BARRY UNIVERSITY — 4APR88

ANDREAS, D INEZ MRS — MIAMI BEACH — FL 33154 PARTY QUALIFIED — PRIMARY — 1,000
DEMOCRATIC SENATORIAL CAMPAIGN COMMITTEE — JUNE MONTHLY
88SEN/010/1101 0368244 CONTRIBUTION — HOUSEWIFE — 24MAY88

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ANDREAS, D INEZ MRS ASKEW FOR US SENATE 88SEN/007/2434 0374384 CONTRIBUTION		MIAMI BEACH HOUSEWIFE	FL 33154	SENATE APRIL QUARTERLY 12FEB88	PRIMARY	1,000
ANDREAS, D INEZ MRS REPUBLICAN NATIONAL COMMITTEE - CONTRIBUTIONS (AKA REPUBLICAN NATIONAL FINANCE COMMITTEE 88FEC/534/3695 0401517 CONTRIBUTION		MIAMI BEACH HOUSEWIFE	FL 33154	PARTY QUALIFIED JULY QUARTERLY 1JUN88	PRIMARY	5,000
ANDREAS, D INEZ MRS ASKEW FOR US SENATE 88SEN/011/2600 0445792 CONTRIBUTION REF TO INDIVIDUAL		MIAMI BEACH	FL 33154	SENATE JULY QUARTERLY 20JUN88	PRIMARY	320-
ANDREAS, D INEZ MRS MAJORITY CONGRESS COMMITTEE 88HSE/352/1333 0463245 MEMO(FILER'S I OF CONTRB GIVEN TO JT FR)		BAL HARBOUR HOUSEWIFE	FL 33154	NON-PARTY QUALIFIED APRIL MONTHLY 29DEC87	PRIMARY	750 AMENDMENT
ANDREAS, D INEZ MRS CAMPAIGN AMERICA 88FEC/561/4579 0584727 CONTRIBUTION		MIAMI BEACH	FL 33154	NON-PARTY QUALIFIED PRE-GENERAL 7OCT88	PRIMARY	1,000
ANDREAS, D MRS JESSE JACKSON FOR PRESIDENT '88 COMMITTEE 88FEC/527/3469 0346354 CONTRIBUTION		MIAMI SHORES	FL 33161	PRESIDENTIAL MAY MONTHLY 16MAR88	PRIMARY	1,000
ANDREAS, D MRS JESSE JACKSON FOR PRESIDENT '88 COMMITTEE 88FEC/527/3469 0346355 CONTRIBUTION		MIAMI SHORES	FL 33161	PRESIDENTIAL MAY MONTHLY 16MAR88	PRIMARY	1,000
ANDREAS, D O MATCH ELECTION COMMITTEE 87SEN/009/1233 0141325 CONTRIBUTION		DECATUR ARCHER DANIELS	IL 62525	SENATE MID-YEAR REPORT 15JUN87	PRIMARY	1,000
ANDREAS, D O KIKA DE LA GARZA FOR CONGRESS 87HSE/334/3845 0136635 CONTRIBUTION		DECATUR BUSINESS EXEC	IL 62525	HOUSE MID-YEAR REPORT 26MAR87	GENERAL	1,000
ANDREAS, D O BURDICK CAMPAIGN COMMITTEE 88SEN/005/2280 0240769 CONTRIBUTION		MIAMI BEACH ARCHER DANIELS MID/MD COMPANY	FL 33154	SENATE YEAR-END 24NOV87	PRIMARY	1,000
ANDREAS, D O ARIENT ASSOCIATION FUND		DECATUR	IL 62525	NON-PARTY QUALIFIED YEAR-END		

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88HSE/344/1411 0248073 CONTRIBUTION	ARCHER DANIELS MIDLAND	7DEC87		
ANDREAS, D O	DAL HARBOUR . FL 33154 HOUSE			
BOWKER FOR CONGRESS COMMITTEE		YEAR-END	PRIMARY	1,000
88HSE/343/0755 0271458 CONTRIBUTION	ARCHER DANIELS MIDLAND COMPANY	17DEC87		

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ANDREAS, D O		MIAMI BEACH	FL 33154 SENATE		
FRIENDS OF SENATOR DAVID KARNES			YEAR-END	PRIMARY	1,000
88SEN/006/1345 0279112 CONTRIBUTION		ARCHER DANIEL MIDLAND CO	13OCT87		AMENDMENT
ANDREAS, D O		DECATUR	IL 62525 NON-PARTY QUALIFIED		
COMMITTEE FOR DEMOCRATIC OPPORTUNITY			JULY QUARTERLY	PRIMARY	1,000
88FEC/538/5225 0434595 CONTRIBUTION		ARCHER DAXIELS MILLAND CO	28APR88		
ANDREAS, D O		DECATUR	IL 62525 NON-PARTY QUALIFIED		
MAJORITY CONGRESS COMMITTEE			APRIL MONTHLY	PRIMARY	750
88HSE/352/1332 0463244 AMND(FILER'S % OF CONTRB GIVEN TO JT FR)		ARCHER DANIELS MIDLAND	29DEC87		AMENDMENT
ANDREAS, D O		MIAMI BEACH	FL 33154 HOUSE		
MICHEL FOR CONGRESS COMMITTEE			OCTOBER QUARTERLY	GENERAL	1,000
88HSE/361/3486 0508331 CONTRIBUTION		ARCHER DANIELS MIDLAND CO	5NOV88		
ANDREAS, D O		MIAMI BEACH	FL 33154 HOUSE		
MICHEL FOR CONGRESS COMMITTEE			POST-GENERAL	GENERAL	1,000
88HSE/370/1506 0663910 CONTRIBUTION		MOMENAKER	16NOV88		
ANDREAS, D O MR		MIAMI BEACH	FL 33154 PRESIDENTIAL		
PAUL SIMON FOR PRESIDENT			JULY QUARTERLY	PRIMARY	1,000
87FEC/475/0181 0041754 CONTRIBUTION		ARCHER DANIELS MIDLAND	33UN87		
ANDREAS, DAVID		MINNEAPOLIS	MN 55416 SENATE		
HUMPHREY FOR SENATE CAMPAIGN COMMITTEE INC			JULY QUARTERLY	PRIMARY	700
88SEN/010/2424 0418540 CONTRIBUTION		NATIONAL CITY BANK	27MAY88		
ANDREAS, DAVID		MINNEAPOLIS	MN 55416 SENATE		
HUMPHREY FOR SENATE CAMPAIGN COMMITTEE INC			POST-GENERAL	GENERAL	700
88SEN/025/0773 0638573 CONTRIBUTION		NATL CITY BANK	4NOV88		
ANDREAS, DAVID L MR		MINNEAPOLIS	MN 55416 PRESIDENTIAL		
JESSE JACKSON FOR PRESIDENT '88 COMMITTEE			JULY MONTHLY	PRIMARY	500
89FEC/612/1381 0703502 CONTRIBUTION		NATIONAL CITY BANKCORPORATION	18JUN88		AMENDMENT
ANDREAS, DEBRA		MINNEAPOLIS	MN 55416 SENATE		
HUMPHREY FOR SENATE CAMPAIGN COMMITTEE INC			JULY QUARTERLY	PRIMARY	1,000
88SEN/010/2424 0418541 CONTRIBUTION		MOMENAKER	31MAY88		
ANDREAS, DEBRA		MINNEAPOLIS	MN 55416 SENATE		

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HUMPHREY FOR SENATE CAMPAIGN COMMITTEE INC		POST-GENERAL		GENERAL	700-
88SEN/025/0773 0638572 CONTRIBUTION	HOMEMAKER		4NOV88		
ANDREAS, DEBRA	MINNEAPOLIS	MN 55416	SENATE		
HUMPHREY FOR SENATE CAMPAIGN COMMITTEE INC		PRE-GENERAL		GENERAL	1,700
88SEN/021/0556 0640491 CONTRIBUTION	HOMEMAKER		4OCT88		

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ANDREAS, DWAYNE RIEGLE FOR SENATE IN '88 COMMITTEE 87SEN/007/1986 0135625 CONTRIBUTION		MIAMI BEACH ARCHER DANIELS MIDLAND COMPANY	FL 33154	SENATE MID-YEAR REPORT 22APR87	PRIMARY	1,000
ANDREAS, DWAYNE DANTE B FASCELL CAMPAIGN COMMITTEE 88HSE/339/4852 0253773 CONTRIBUTION		DECATUR ARCHER DANIELS MIDLA	IL 62525	HOUSE YEAR-END 21DEC87	PRIMARY	1,000
ANDREAS, DWAYNE METZENBAUM FOR SENATE- 88 88SEN/010/2653 0418178 CONTRIBUTION		DECATUR ARCHER DANIELS MIDLAND	IL 62525	SENATE JULY QUARTERLY 72JN88	GENERAL	1,000
ANDREAS, DWAYNE MR ASKEW FOR US SENATE 88SEN/011/3706 0447222 CONTRIBUTION REF TO INDIVIDUAL		MIAMI BEACH	FL 33154	SENATE JULY QUARTERLY 20JUN88	PRIMARY	320-
ANDREAS, DWAYNE D MONDALE/FERRARO COMMITTEE INC/LEGAL AND ACCOUNTING COMPLIANCE FUND 85FEC/355/3370 0004981 CONTRIBUTION		DECATUR ARCHER DANIELS MIDLAND CO	IL 62526	PRESIDENTIAL APRIL QUARTERLY 4FEB85	GENERAL	1,000
ANDREAS, DWAYNE D GEPHARDT FOR PRESIDENT COMMITTEE INC 87FEC/425/5208 0017048 CONTRIBUTION		MIAMI BEACH ARCHER DANIELS MIDLAND CO	FL 33154	PRESIDENTIAL APRIL QUARTERLY 20FEB87	PRIMARY	1,000
ANDREAS, DWAYNE D DURENBERGER FOR U S SENATE VOLUNTEER COMMITTEE 87SEN/008/2382 0133060 CONTRIBUTION		BAL HARBOUR	FL 33154	SENATE MID-YEAR REPORT 17MAR87	PRIMARY	1,000
ANDREAS, DWAYNE D HELCHER FOR SENATE COMMITTEE 87SEN/008/2517 0134348 CONTRIBUTION		BAL HARBOUR ARCHER DANIELS MIDLAND CO	FL 33154	SENATE MID-YEAR REPORT 63JN87	PRIMARY	1,000
ANDREAS, DWAYNE D HECHT REELECTION COMMITTEE 88SEN/001/3625 0250758 CONTRIBUTION		DECATUR ARCHER DANIELS MIDLAND COMPANY	IL 62525	SENATE YEAR-END 17SEP87	PRIMARY	1,000
ANDREAS, DWAYNE D DUKAKIS FOR PRESIDENT COMMITTEE, INC 88FEC/531/0082 0364187 CONTRIBUTION		DECATUR ARCHER DANIELS MIDLAND CO	IL 62525	PRESIDENTIAL JUNE MONTHLY 25MAY88	PRIMARY	1,000
ANDREAS, DWAYNE D		MIAMI BEACH	FL 33154	SENATE		

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ASKEW FOR US SENATE 88SEN/007/2434 0274383 CONTRIBUTION		APRIL QUARTERLY 12FEB88	PRIMARY	1,000
ANDREAS, DWAYNE O GRAY FOR U S SENATOR COMMITTEE 88SEN/012/1143 0429731 CONTRIBUTION	MIAMI BEACH *FL 33154 ARCHER DANIELS MIDLAND	SENATE JULY QUARTERLY 14APR88	PRIMARY	1,000

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ANDREAS, DWAYNE O FRIENDS OF CONNIE MACK 88SEN/011/2192 0456958 CONTRIBUTION		MIAMI BEACH ARCHER DANIELS	FL 33154	SENATE JULY QUARTERLY 22APR88	PRIMARY	1,000
ANDREAS, DWAYNE O BUREMBERGER FOR U S SENATE VOLUNTEER COMMITTEE 88SEN/025/0588 0627508 CONTRIBUTION		BAL HARBOR EXECUTIVE	FL 33154	SENATE POST-GENERAL 19NOV88	GENERAL	1,000
ANDREAS, DWAYNE O FRIENDS OF CONNIE MACK 88SEN/026/1246 0647698 CONTRIBUTION		MIAMI BEACH ARCHER DANIELS	FL 33154	SENATE POST-GENERAL 28OCT88	GENERAL	1,000
ANDREAS, DWAYNE O MR FRIENDS OF ROBERT C BYRD COMMITTEE 87SEN/009/0823 0147456 CONTRIBUTION		MIAMI BEACH ARCHER-DANIELS-MIDLAND	FL 33154	SENATE MID-YEAR REPORT 17FEB87	PRIMARY	1,000
ANDREAS, DWAYNE O MR MCCONNELL SENATE COMMITTEE '90 87SEN/007/0021 0148346 CONTRIBUTION		MIAMI BEACH ARCHER DANIELS MIDLAND CO	FL 33154	SENATE MID-YEAR REPORT 15MAY87	PRIMARY	1,000
ANDREAS, DWAYNE O MR SENATOR LLOYD BENTSEN ELECTION COMMITTEE 88SEN/004/1248 0240879 CONTRIBUTION		DECATUR ARCHER DANIELS MIDLN	IL 62525	SENATE YEAR-END 48DEC87	PRIMARY	1,000
ANDREAS, DWAYNE O MR FRIENDS OF DICK LUGAR 88SEN/006/3281 0301540 CONTRIBUTION		DECATUR	IL 62525	SENATE APRIL QUARTERLY 22APR88	PRIMARY	1,000
ANDREAS, DWAYNE O MR COMMITTEE FOR DAN GIBBONS 88HSE/346/4340 0333942 CONTRIBUTION		MIAMI BEACH ARCHER DANIELS	FL 33154	HOUSE APRIL QUARTERLY 14APR88	PRIMARY	1,000
ANDREAS, DWAYNE O MR ALBERT GORE JR FOR PRESIDENT COMMITTEE INC 88FEC/527/1640 0343840 CONTRIBUTION		MIAMI BEACH	FL 33154	PRESIDENTIAL MAY MONTHLY 46PR88	PRIMARY	1,000
ANDREAS, DWAYNE O MR DEMOCRATIC SENATORIAL CAMPAIGN COMMITTEE 88SEN/010/1102 0368245 CONTRIBUTION		BAL HARBOUR ARCHER DANIELS MIDLAND	FL 33154	PARTY QUALIFIED JUNE MONTHLY 24MAY88	PRIMARY	1,000
ANDREAS, DWAYNE O MR		DECATUR	IL 62525	PARTY QUALIFIED		

REPUBLICAN NATIONAL COMMITTEE - CONTRIBUTIONS (AKA REPUBLICAN NATIONAL FINANCE COMMITTEE 88FEC/534/3696 0401518 CONTRIBUTION	ARCHER-DANIELS-MIDLAND		JULY QUARTERLY 1JUN88	PRIMARY	5,000
ANDREAS, DWAYNE O MRS SENATOR LLOYD BENTSEN ELECTION COMMITTEE 88SEN/004/1240 0240881 CONTRIBUTION	MIAMI BEACH BARRY UNIVERSITY	FL 33152	SENATE YEAR-END 4NOV87	PRIMARY	1,000

CONTRIBUTOR/LENDER/TRANSFERRER REPORTING ENTITY MICROFILM LOCATION TRANSACTION TYPE	STREET ADDRESS	CITY	STATE ZIP	TYPE OF FILER REPORT TYPE DATE	ELECTION	AMOUNT
ANDREAS, G JESSE JACKSON FOR PRESIDENT '88 COMMITTEE 88FEC/527/3610 0346512 CONTRIBUTION		PELLA	IA 50219	PRESIDENTIAL MAY MONTHLY 22APR88	PRIMARY	1,000
ANDREAS, G A DUKAKIS FOR PRESIDENT COMMITTEE, INC 88FEC/531/0082 0364188 CONTRIBUTION		MANKATO	MN 56001	PRESIDENTIAL JUNE MONTHLY 25MAY88	PRIMARY	1,000
ANDREAS, G A ALLEN JR MR REPUBLICAN NATIONAL COMMITTEE - CONTRIBUTIONS (AKA REPUBLICAN NATIONAL FINANCE COMMITTEE 88FEC/534/3696 0401519 CONTRIBUTION	DECATUR ARCHER-DANIELS-MIDLAND	IL 62526	PARTY QUALIFIED JULY QUARTERLY 1JUN88	PRIMARY	5,000
ANDREAS, G A JR MR PAUL SIMON FOR PRESIDENT 87FEC/488/2211 0107414 CONTRIBUTION	DECATUR ARCHER DANIELS MIDLAND COMPAN	IL 62526	PRESIDENTIAL OCTOBER QUARTERLY 19NOV87	PRIMARY	1,000
ANDREAS, G A MR PAUL SIMON FOR PRESIDENT 87FEC/488/2210 0107412 CONTRIBUTION	MANKATO G ALLEN ANDREAS AND COMPANY	MN 56001	PRESIDENTIAL OCTOBER QUARTERLY 14SEP87	PRIMARY	1,000
ANDREAS, G A MR DOLE FOR PRESIDENT COMMITTEE INC 88FEC/506/4329 0208395 CONTRIBUTION	PELLA	IA 50219	PRESIDENTIAL FEBRUARY MONTHLY 6JAN88	PRIMARY	1,000
ANDREAS, G A MR REPUBLICAN NATIONAL COMMITTEE - CONTRIBUTIONS (AKA REPUBLICAN NATIONAL FINANCE COMMITTEE 88FEC/534/3696 0401520 CONTRIBUTION	PELLA	IA 50219	PARTY QUALIFIED JULY QUARTERLY 1JUN88	PRIMARY	5,000
ANDREAS, G ALLEN JR BURDICK CAMPAIGN COMMITTEE 88SEN/005/2281 0240773 CONTRIBUTION	DECATUR ARCHER DANIELS MIDLAND COMPANY	IL 62526	SENATE YEAR-END 18NOV87	PRIMARY	1,000
ANDREAS, G ALLEN JR DUKAKIS FOR PRESIDENT COMMITTEE, INC 88FEC/531/0082 0364190 CONTRIBUTION	DECATUR ARCHER DANIELS MIDLAND CO	IL 62526	PRESIDENTIAL JUNE MONTHLY 25MAY88	PRIMARY	1,000
ANDREAS, G ALLEN JR MICHEL FOR CONGRESS COMMITTEE 88HSE/361/3487 0508334 CONTRIBUTION	DECATUR ADM	IL 62526	HOUSE OCTOBER QUARTERLY 31AUG88	GENERAL	500
ANDREAS, G ALLEN JR	DECATUR	IL 62526	HOUSE		

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BURDIN FOR CONGRESS COMMITTEE 88HSE/370/4931 0670787 CONTRIBUTION		ARCHER DANIELS-MIDLAND	POST-GENERAL IMOV88	GENERAL	500
ANDREAS, G ALLEN JR MR GEORGE BUSH FOR PRESIDENT, INC 88FEC/505/1279 0184786 CONTRIBUTION	DECATUR	IL 62526 ARCHER DANIDS MIDLAND COMPANY	PRESIDENTIAL YEAR-END 15OCT87	PRIMARY	1,000

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ANDREAS, G ALLEN JR MR DOLE FOR PRESIDENT COMMITTEE INC 88FEC/506/4329 0208396 CONTRIBUTION		DECATUR	IL 62526 FEBRUARY MONTHLY 29JAN88	PRESIDENTIAL PRIMARY	1,000
ANDREAS, G ALLEN JR MR SENATOR LLOYD BENTSEN ELECTION COMMITTEE 88SEN/004/1248 0240082 CONTRIBUTION	ARCHER DANIELS MIDLN	DECATUR	IL 62525 YEAR-END 4NOV87	SENATE PRIMARY	1,000
ANDREAS, G ALLEN JR MR DEMOCRATIC SENATORIAL CAMPAIGN COMMITTEE 88SEN/010/1102 0368246 CONTRIBUTION	ARCHER DANIELS MIDLAND	DECATUR	IL 62526 JUNE MONTHLY 24MAY88	PARTY QUALIFIED PRIMARY	1,000
ANDREAS, G MR JESSE JACKSON FOR PRESIDENT '88 COMMITTEE 88FEC/527/3469 0346357 CONTRIBUTION	ARCHER DANIELS MIDLAND CO	DECATUR	IL 62526 MAY MONTHLY 14APR88	PRESIDENTIAL PRIMARY	1,000
ANDREAS, GEORGE C FRIENDS OF LARRY PRESSLER COMMITTEE 87SEN/009/1598 0146783 CONTRIBUTION	MC LEAN	VA 22101 MID-YEAR REPORT 31JUL87	SENATE PRIMARY	500	
ANDREAS, GEORGE C BUKAKIS FOR PRESIDENT COMMITTEE, INC 88FEC/517/3927 0301998 CONTRIBUTION	MCLEAN LANTZSCH ANDREAS	VA 22101 APRIL MONTHLY 25MAR88	PRESIDENTIAL PRIMARY	1,000	
ANDREAS, GEORGE C BUKAKIS FOR PRESIDENT COMMITTEE, INC 88FEC/548/2095 0542793 CONTRIBUTION	MCLEAN LANTZSCH ANDREAS ENTERPRISES INC	VA 22101 MAY MONTHLY 25MAR88	PRESIDENTIAL PRIMARY AMENDMENT	1,000-	
ANDREAS, GEORGE C BUKAKIS FOR PRESIDENT COMMITTEE, INC 88FEC/548/2095 0542794 CONTRIBUTION	MCLEAN LANTZSCH ANDREAS ENTERPRISES INC	VA 22101 MAY MONTHLY 27MAR88	PRESIDENTIAL PRIMARY AMENDMENT	500	
ANDREAS, GEORGE C MR VICTORY 88 88FEC/554/5168 0528549 CONTRIBUTION	VIENNA LANTZSCH-ANDREAS ENTERPRISES	VA 22180 OCTOBER QUARTERLY 22JUN88	PARTY QUALIFIED PRIMARY	1,000	
ANDREAS, GERI JESSE JACKSON FOR PRESIDENT '88 COMMITTEE 88FEC/527/3547 0346456 CONTRIBUTION	GROSSE POINT PARK MI	PRESIDENTIAL MAY MONTHLY 22APR88	PRIMARY	1,000	

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ANDREAS, GLENN	DECATUR	IL 62526	NON-PARTY QUALIFIED		
PAUL SIMON FOR PRESIDENT		MAY MONTHLY		PRIMARY	1,000
88FEC/527/2800 0346168 CONTRIBUTION		16APR88			
ANDREAS, GLENN A	DECATUR	IL 62526	NON-PARTY QUALIFIED		
ARCHER DANIELS MIDLAND COMPANY-ADM PAC		YEAR-END		PRIMARY	500
89FEC/582/0785 0681819 CONTRIBUTION	A D M	31DEC88			

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ANDREAS, GLENN A MR		PELLA	IA 50219	PARTY QUALIFIED		
DEMOCRATIC SENATORIAL CAMPAIGN COMMITTEE				JUNE MONTHLY	PRIMARY	1,000
88SEN/010/1102 0368247 CONTRIBUTION		RETIRED		24MAY88		
ANDREAS, J D		MIAMI SHORES	FL 33161	PRESIDENTIAL		
JESSE JACKSON FOR PRESIDENT '88 COMMITTEE				MAY MONTHLY	PRIMARY	1,000
88FEC/612/1670 0702824 CONTRIBUTION				16APR88		AMENDMENT
ANDREAS, L M		MINNEAPOLIS	MN 55401	NON-PARTY QUALIFIED		
ARCHER DANIELS MIDLAND COMPANY-ADM PAC				MID-YEAR REPORT	PRIMARY	5,000
87FEC/474/1160 0064327 CONTRIBUTION	ADM			22MAY87		
ANDREAS, L M		DECATUR	IL 62525	SENATE		
HUMPHREY FOR SENATE CAMPAIGN COMMITTEE INC				MID-YEAR REPORT	PRIMARY	1,000
87SEN/007/0201 0134874 CONTRIBUTION		ARCHER DANIELS		24JUN87		
ANDREAS, L M		DECATUR	IL 62525	SENATE		
HUMPHREY FOR SENATE CAMPAIGN COMMITTEE INC				POST-GENERAL	GENERAL	1,000
88SEN/025/0746 0638476 CONTRIBUTION		ARCHER DANIELS		4NOV88		
ANDREAS, L M MR				PRESIDENTIAL		
PAUL SIMON FOR PRESIDENT				APRIL MONTHLY	PRIMARY	1,000
88FEC/522/0669 0297819 CONTRIBUTION				31MAR88		
ANDREAS, LOWELL M		MANKATO	MN 56001	SENATE		
DURENBERGER FOR U S SENATE VOLUNTEER COMMITTEE				MID-YEAR REPORT	PRIMARY	1,000
87SEN/008/2418 0134017 CONTRIBUTION	ADM CO			21APR87		
ANDREAS, LOWELL M		MANKATO	MN 56001	SENATE		
DURENBERGER FOR U S SENATE VOLUNTEER COMMITTEE				POST-GENERAL	GENERAL	1,000
88SEN/025/0589 0627509 CONTRIBUTION				2NOV88		
ANDREAS, LOWELL M MR		MANKATO	MN 56001	PARTY QUALIFIED		
DEMOCRATIC SENATORIAL CAMPAIGN COMMITTEE				JUNE MONTHLY	PRIMARY	1,000
88SEN/010/1102 0368248 CONTRIBUTION		ARCHER DANIELS MIDLAND		24MAY88		
ANDREAS, M		GROSSE POINT PARK	MI	PRESIDENTIAL		
JESSE JACKSON FOR PRESIDENT '88 COMMITTEE				MAY MONTHLY	PRIMARY	1,000
88FEC/527/3610 0346510 CONTRIBUTION				22APR88		

ANDREAS, N STEPHEN DUKAKIS FOR PRESIDENT COMMITTEE, INC 88FEC/531/0083 0364191 CONTRIBUTION	GROSSE POINTE G ALLEN ANDREAS & CO	MI 48230	PRESIDENTIAL JUNE MONTHLY 29MAY88	PRIMARY	1,000
ANDREAS, MARTIN ARCHER DANIELS MIDLAND COMPANY-ADM PAC 88FEC/534/1557 0386537 CONTRIBUTION	DOLON ADM-CORN SWEETNERS	IA 52333	NON-PARTY QUALIFIED JULY QUARTERLY 19APR88	PRIMARY	5,000

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ANDREAS, MARTIN L KIKA DE LA GARZA FOR CONGRESS 88HSE/342/2168 0260336 CONTRIBUTION		DECATUR FARMER	IL 62521	HOUSE YEAR-END 23SEP87	GENERAL	500
ANDREAS, MARTIN L KICHEL FOR CONGRESS COMMITTEE 88HSE/361/3489 0508330 CONTRIBUTION		DECATUR ADM	IL 62521	HOUSE OCTOBER QUARTERLY 15OCT88	GENERAL	500
ANDREAS, MARTIN L MR BOLE FOR PRESIDENT COMMITTEE INC 88FEC/506/4329 0208397 CONTRIBUTION				PRESIDENTIAL FEBRUARY MONTHLY 63MAR88	PRIMARY	1,000
ANDREAS, MICHAEL HUMPHREY FOR SENATE CAMPAIGN COMMITTEE INC 88SEN/021/0556 0640497 CONTRIBUTION		GROSSE POINTE PARK	IL 48230	SENATE PRE-GENERAL 19OCT88	GENERAL	500
ANDREAS, MICHAEL D BURDICK CAMPAIGN COMMITTEE 88SEN/005/2280 0240770 CONTRIBUTION		DECATUR ARCHER DANIELS MIDLAND COMPANY	IL 52521	SENATE YEAR-END 18DEC87	PRIMARY	1,000
ANDREAS, MICHAEL D KIKA DE LA GARZA FOR CONGRESS 88HSE/342/2168 0260337 CONTRIBUTION		DECATUR FARMER	IL 62525	HOUSE YEAR-END 23SEP87	GENERAL	500
ANDREAS, MICHAEL D DUKAKIS FOR PRESIDENT COMMITTEE, INC 88FEC/531/0083 0364192 CONTRIBUTION		DECATUR ARCHER DANIELS MIDLAND CO	IL 62521	PRESIDENTIAL JUNE MONTHLY 29MAY88	PRIMARY	1,000
ANDREAS, MICHAEL D MICHEL FOR CONGRESS COMMITTEE 88HSE/361/3486 0508330 CONTRIBUTION		MANKATO ARCHER DANIELS MIDLAND CORP	MN 56001	HOUSE OCTOBER QUARTERLY 15OCT88	GENERAL	1,000
ANDREAS, MICHAEL D CITIZENS FOR EDMUND R MADIGAN 88HSE/372/4231 0663957 CONTRIBUTION		DECATUR ADM	IL 62521	HOUSE POST-GENERAL 24OCT88	GENERAL	500
ANDREAS, MICHAEL D BURBIN FOR CONGRESS COMMITTEE 88HSE/370/4932 0670790 CONTRIBUTION		DECATUR ARCHER DANIELS-MIDLAND	IL 62521	HOUSE POST-GENERAL 1NOV88	GENERAL	500

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ANDREAS, MICHAEL D MR PAUL SIMON FOR PRESIDENT 87FEC/488/2211 0107413 CONTRIBUTION	DECATUR ARCHER DANIELS MIDLAND CO	IL 62521	PRESIDENTIAL OCTOBER QUARTERLY 14SEP87	PRIMARY	1,000
ANDREAS, MICHAEL D MR ALBERT GORE JR FOR PRESIDENT COMMITTEE INC 88FEC/527/1640 0343841 CONTRIBUTION	DECATUR ARCHER DANIELS MIDLAND CO	IL 62521	PRESIDENTIAL MAY MONTHLY 4APR88	PRIMARY	1,000

CONTRIBUTOR/LENDER/TRANSFERRER REPORTING ENTITY MICROFILM LOCATION TRANSACTION TYPE	STREET ADDRESS	CITY	STATE ZIP	TYPE OF FILER REPORT TYPE DATE	ELECTION	AMOUNT
ANDREAS, MICHAEL D MR DEMOCRATIC SENATORIAL CAMPAIGN COMMITTEE 88SEN/010/1102 0366249 CONTRIBUTION		DECATUR ARCHER DANIELS MIDLAND	IL 62521	PARTY QUALIFIED JUNE MONTHLY 24JUN88	PRIMARY	1,000
ANDREAS, MICHAEL D MR REPUBLICAN NATIONAL COMMITTEE - CONTRIBUTIONS (AKA REPUBLICAN NATIONAL FINANCE COMMITTEE 88FEC/53A/3696 0401524 CONTRIBUTION		DECATUR ARCHER DANIELS MIDLAND CO	IL 62521	PARTY QUALIFIED JULY QUARTERLY 13JUN88	PRIMARY	5,000
ANDREAS, MICHAEL DWAY MR DOLE FOR PRESIDENT COMMITTEE INC 88FEC/506/4329 0208398 CONTRIBUTION		MANKATO	MN 56001	PRESIDENTIAL FEBRUARY MONTHLY 63JAN88	PRIMARY	1,000
ANDREAS, MICHAEL DWAYNE WRIGHT APPRECIATION FUND 88HSE/344/1412 0248075 CONTRIBUTION		DECATUR ARCHER DANIELS MIDLAND	IL 62525	NON-PARTY QUALIFIED YEAR-END 7DEC87	PRIMARY	1,000
ANDREAS, MICHAEL DWAYNE FRIENDS OF SENATOR DAVID KARNES 88SEN/006/1345 0279115 CONTRIBUTION		DECATUR ARCHER DANIELS MIDLAND	IL 62521	SENATE YEAR-END 15OCT87	PRIMARY AMENDMENT	1,000
ANDREAS, MICHAEL DWAYNE MAJORITY CONGRESS COMMITTEE 88HSE/352/1333 0463246 MEMO(FILER'S % OF CONTRB GIVEN TO JT FR)		DECATUR ARCHER DANIELS MIDLAND	IL 62525	NON-PARTY QUALIFIED APRIL MONTHLY 7DEC87	PRIMARY AMENDMENT	750
ANDREAS, MICHAEL DWAYNE MR SENATOR LLOYD BENTSEN ELECTION COMMITTEE 88SEN/004/1248 0240880 CONTRIBUTION		DECATUR ARCHER DANIELS MIDLN	IL 62521	SENATE YEAR-END 4NOV87	PRIMARY	1,000
ANDREAS, MICHAEL MR PAUL SIMON FOR PRESIDENT 88FEC/527/2808 0346169 CONTRIBUTION		DECATUR G ALLEN ANDREAS & COMPANY	IL 62521	PRESIDENTIAL MAY MONTHLY 1APR88	PRIMARY	1,000
ANDREAS, MICHAEL MR PAUL SIMON FOR PRESIDENT 88FEC/539/5080 0473659 CONTRIBUTION REF TO INDIVIDUAL		DECATUR	IL 62521	PRESIDENTIAL AUGUST MONTHLY 10JUL88	PRIMARY	1,000-
ANDREAS, NADINE HUMPHREY FOR SENATE CAMPAIGN COMMITTEE INC 87SEN/007/0281 0134875 CONTRIBUTION		DECATUR HOMEMAKER	IL 62525	SENATE MID-YEAR REPORT 24JUN87	PRIMARY	1,000

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WOREAS, NADINE DUREMBERGER FOR U S SENATE VOLUNTEER COMMITTEE 88SEN/003/2608 8250496 CONTRIBUTION	MANKATO	MN 56001 SENATE YEAR-END 6JUL87	GENERAL	1,000
WOREAS, NADINE DUREMBERGER FOR U S SENATE VOLUNTEER COMMITTEE 88SEN/025/0589 8627510 CONTRIBUTION	MANKATO HOMEMAKER	MN 56001 SENATE POST-GENERAL 7NOV88	GENERAL	1,000

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WOREAS, NADINE HUMPHREY FOR SENATE CAMPAIGN COMMITTEE INC 88SEN/025/0746 8638477 CONTRIBUTION		DECATUR HOMEMAKER	IL 62525 SENATE POST-GENERAL 4NOV88	GENERAL	1,000
WOREAS, NADINE B DEMOCRATIC SENATORIAL CAMPAIGN COMMITTEE 88SEN/010/1102 8368250 CONTRIBUTION		MANKATO HOUSEWIFE	MN 56001 PARTY QUALIFIED JUNE MONTHLY 24MAY88	PRIMARY	1,000
WOREAS, NADINE B MRS PAUL SIMON FOR PRESIDENT 88FEC/322/0670 8297820 CONTRIBUTION			PRESIDENTIAL APRIL MONTHLY 31MAR88	PRIMARY	1,000
WOREAS, SALLY M BURDICK CAMPAIGN COMMITTEE 88SEN/005/2280 8240771 CONTRIBUTION		DECATUR HOMEMAKER	IL 62521 SENATE YEAR-END 18NOV87	PRIMARY	1,000
WOREAS, SALLY M MRS REPUBLICAN NATIONAL COMMITTEE - CONTRIBUTIONS (AKA REPUBLICAN NATIONAL FINANCE COMMITTEE 88FEC/534/3696 8401525 CONTRIBUTION		DECATUR HOUSEWIFE	IL 62521 PARTY QUALIFIED JULY QUARTERLY 13JUN88	PRIMARY	5,000
WOREAS, SALLY WHITLE MS DOLE FOR PRESIDENT COMMITTEE INC 88FEC/506/4329 8208399 CONTRIBUTION		DECATUR HOMEMAKER	IL 62521 PRESIDENTIAL FEBRUARY MONTHLY 6JAN88	PRIMARY	1,000
WOREAS, SALLY WHITLEY MS ALBERT GORE JR FOR PRESIDENT COMMITTEE INC 88FEC/527/1640 8343842 CONTRIBUTION		DECATUR	IL 62521 PRESIDENTIAL MAY MONTHLY 4APR88	PRIMARY	1,000
WOREAS, SALLY WHITNEY DUKAKIS FOR PRESIDENT COMMITTEE, INC 88FEC/531/0083 8364193 CONTRIBUTION		DECATUR HOMEMAKER	IL 62521 PRESIDENTIAL JUNE MONTHLY 25MAY88	PRIMARY	1,000
WOREAS, STEVE COLORADANS FOR DAVID SKAGGS 88HSE/362/0901 8516529 CONTRIBUTION		BOULDER BOOK PUBLISHER	CO 80302 HOUSE OCTOBER QUARTERLY 28SEP88	GENERAL	950
WOREAS, STEVE NATIONAL COMMITTEE FOR AN EFFECTIVE CONGRESS 88FEC/573/1032 8651255 CONTRIBUTION		BOULDER PUBLISHER	CO 80302 NON-PARTY QUALIFIED POST-GENERAL 28OCT88	PRIMARY	250

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WOREAS, TONI BURDICK CAMPAIGN COMMITTEE 88SEN/005/2280 8240772 CONTRIBUTION	DECATUR HOMEMAKER	IL 62526 SENATE YEAR-END 16NOV87	PRIMARY	1,000
WOREAS, TONI DUKAKIS FOR PRESIDENT COMMITTEE, INC 88FEC/531/0083 8364194 CONTRIBUTION	DECATUR HOMEMAKER	IL 62526 PRESIDENTIAL JUNE MONTHLY 25MAY88	PRIMARY	1,000

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WOREAS, TONI K MS REPUBLICAN NATIONAL COMMITTEE - CONTRIBUTIONS (AKA REPUBLICAN NATIONAL FINANCE COMMITTEE 88FEC/534/3696 8401527 CONTRIBUTION		DECATUR ARCHER DANIELS MIDLAND	IL 62526 PARTY QUALIFIED JULY QUARTERLY 13JUN88	PRIMARY	5,000
WOREAS, TONI MS DOLE FOR PRESIDENT COMMITTEE INC 88FEC/506/4330 8208400 CONTRIBUTION		DECATUR	IL 62526 PRESIDENTIAL FEBRUARY MONTHLY 6JAN88	PRIMARY	1,000
WOREAS, TONI MS JESSE JACKSON FOR PRESIDENT '88 COMMITTEE 88FEC/527/3449 8346356 CONTRIBUTION		DECATUR HOUSEWIFE	IL 62526 PRESIDENTIAL MAY MONTHLY 16APR88	PRIMARY	1,000
WOREAS, TONI MS DEMOCRATIC SENATORIAL CAMPAIGN COMMITTEE 88SEN/010/1102 8368251 CONTRIBUTION		DECATUR HOUSEWIFE	IL 62526 PARTY QUALIFIED JUNE MONTHLY 24MAY88	PRIMARY	1,000
WOREAS, URSULA E DUKAKIS FOR PRESIDENT COMMITTEE, INC 88FEC/548/2095 8542795 CONTRIBUTION		MCLEAN	VA 22101 PRESIDENTIAL MAY MONTHLY 27APR88	PRIMARY	500 AMENDMENT
WOREAS, VERA I DUKAKIS FOR PRESIDENT COMMITTEE, INC 88FEC/531/0082 8364189 CONTRIBUTION		WANKATO	MN 56001 PRESIDENTIAL JUNE MONTHLY 25MAY88	PRIMARY	1,000
WOREAS, VERA I DEMOCRATIC SENATORIAL CAMPAIGN COMMITTEE 88SEN/010/1103 8368252 CONTRIBUTION		PELLA HOUSEWIFE	IA 50219 PARTY QUALIFIED JUNE MONTHLY 24MAY88	PRIMARY	1,000
WOREAS, VERA I MRS PAUL SIMON FOR PRESIDENT 88FEC/522/0670 8297821 CONTRIBUTION		WANKATO	MN 56001 PRESIDENTIAL APRIL MONTHLY 31MAR88	PRIMARY	1,000
WOREAS, VERA I MS DOLE FOR PRESIDENT COMMITTEE INC 88FEC/506/4330 8208401 CONTRIBUTION		PELLA	IA 50219 PRESIDENTIAL FEBRUARY MONTHLY 6JAN88	PRIMARY	1,000
WOREAS, VERA MS JESSE JACKSON FOR PRESIDENT '88 COMMITTEE 88FEC/527/3610 8346511 CONTRIBUTION		PELLA	IA 50219 PRESIDENTIAL MAY MONTHLY 22APR88	PRIMARY	1,000

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HUNT, ALAN R ESQ INC SERVICES CORPORATION/DEMOCRATIC NATIONAL COMMITTEE 88FEC/562/2949 0629700 CONTRIBUTION		SWARTHMORE DUANE MORRIS ET AL	PA 19081	PARTY QUALIFIED PRE-GENERAL 5OCT88	PRIMARY	1,000
HUNT, ALAN REEVE DUKAKIS FOR PRESIDENT COMMITTEE, INC 87FEC/476/4625 0096379 CONTRIBUTION		SWARTHMORE	PA 19081	PRESIDENTIAL OCTOBER QUARTERLY 19SEP87	PRIMARY	1,000
HUNT, ALBERT B MR NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS * 88SEN/002/1550 0230667 CONTRIBUTION		BOSTON CHAIRMAN OF THE BOARD	MA 02199	PARTY QUALIFIED YEAR-END 21OCT87	PRIMARY	1,000
HUNT, ALBERT B MR NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS * 88SEN/010/4045 0409733 CONTRIBUTION		BOSTON CHAIRMAN OF THE BOARD	MA 02199	PARTY QUALIFIED JULY QUARTERLY 31MAY88	PRIMARY	500
HUNT, ALEX T JR MR NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS * 88SEN/021/1453 0606974 CONTRIBUTION		RUSTON	LA 71270	PARTY QUALIFIED PRE-GENERAL 13OCT88	PRIMARY	1,000
HUNT, ALVARO MD JERRY SCHEXNEN FOR CONGRESS 88HSE/354/4085 0464043 CONTRIBUTION		NEW ORLEANS PHYSICIAN	LA 70123	HOUSE JULY QUARTERLY 25APR88	PRIMARY	500
HUNT, ALVARO MD JERRY SCHEXNEN FOR CONGRESS 88HSE/354/4085 0464044 CONTRIBUTION		NEW ORLEANS PHYSICIAN	LA 70123	HOUSE JULY QUARTERLY 29JUN88	GENERAL	500
HUNT, ALVIS FRIENDS OF MIKE PARKER FOR CONGRESS 88HSE/354/0204 0401339 CONTRIBUTION		JACKSON TRUSTMARK BANK JACKSON	MS 39205	HOUSE JULY QUARTERLY 0APR88	GENERAL	500
HUNT, ALVIS T MISSISSIPPIANS FOR WAYNE DOWDY 88SEN/019/0632 0519689 CONTRIBUTION		JACKSON TRUSTMARK NATL BANK	MS 39205	SENATE OCTOBER QUARTERLY 24NOV88	GENERAL	1,000
HUNT, ANDREW W SENATOR CHAFEE COMMITTEE		PROVIDENCE	RI 02906	SENATE APRIL QUARTERLY	PRIMARY	800

88EEN/008/2373 0366540 CONTRIBUTION	KIDDER PEABODY & CO		5FEB88	
HUNT, B M	DALLAS	TX 75201 HOUSE		
COMPRESSMAN JOE BARTON COMMITTEE		- POST-GENERAL	PRIMARY	1,000
88HSE/372/2797 0645353 CONTRIBUTION	HUNT ENERGY	14NOV88		
HUNT, BARBARA B	ST LOUIS	MO 63127 PRESIDENTIAL		
GEPHARDT FOR PRESIDENT COMMITTEE INC		APRIL QUARTERLY	PRIMARY	500
87FEC/425/5315 0032292 CONTRIBUTION		22FEB87		

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HUNT, BARBIE		DALLAS	TX 75234 PRESIDENTIAL		
LAROUCHE DEMOCRATIC CAMPAIGN			JUNE MONTHLY	PRIMARY	500
88FEC/531/2705 0360930 CONTRIBUTION		HOUSEWIFE	16MAY88		
HUNT, BOB		UNION CITY	TN 38261 HOUSE		
FRIENDS OF JOHN TANNER			APRIL QUARTERLY	PRIMARY	1,000
88HSE/348/3428 0325373 CONTRIBUTION		FARM BUREAU	10FEB88		
HUNT, BOB W MR		FAIRFIELD	IA 52556 PRESIDENTIAL		
AMERICANS FOR ROBERTSON INC			MARCH MONTHLY	PRIMARY	500
88FEC/514/3293 0265438 CONTRIBUTION			25FEB88		
HUNT, BRENDAN		WASHINGTON	DC 20003 PRESIDENTIAL		
DUKAKIS FOR PRESIDENT COMMITTEE, INC			OCTOBER MONTHLY	PRIMARY	500
88FEC/548/3290 0516658 CONTRIBUTION			30SEP88		
HUNT, CAROLINE		DALLAS	TX HOUSE		
FRIENDS OF DICK ARMEY			MID-YEAR REPORT	PRIMARY	1,000
87HSE/337/1805 0152234 CONTRIBUTION		HOUSEWIFE	22JUN87		
HUNT, CAROLINE		DALLAS	TX HOUSE		
FRIENDS OF DICK ARMEY			MID-YEAR REPORT	GENERAL	1,000
87HSE/337/1813 0152268 CONTRIBUTION		HOUSEWIFE	22JUN87		
HUNT, CAROLINE		DALLAS	TX 75201 NON-PARTY QUALIFIED		
CONSERVATIVE VICTORY COMMITTEE			AUGUST MONTHLY	PRIMARY	5,000
88FEC/542/3010 0469423 CONTRIBUTION			13JUL88		
HUNT, CAROLINE JR MRS		DALLAS	TX 75201 PARTY QUALIFIED		
REPUBLICAN NATIONAL COMMITTEE - CONTRIBUTIONS (AKA REPUBLICAN NATIONAL FINANCE COMMITTEE			JULY QUARTERLY	PRIMARY	10,000
88FEC/534/3906 0402275 CONTRIBUTION		INVESTMENTS	18APR88		
HUNT, CAROLINE R		DALLAS	TX 75201 NON-PARTY QUALIFIED		
CONSERVATIVE VICTORY COMMITTEE			AUGUST MONTHLY	PRIMARY	1,000
88FEC/542/3010 0469421 CONTRIBUTION			25JUL88		
HUNT, CAROLINE R MS		DALLAS	TX 75201 PRESIDENTIAL		
GEORGE BUSH FOR PRESIDENT INC COMPLIANCE			JUNE MONTHLY	GENERAL	1,000

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88FEC/531/1261 0376067 CONTRIBUTION			9MAY88		
HUNT, CAROLINE ROSE COTTONWOOD POLITICAL ACTION COMMITTEE A/K/A COTTONWOOD PAC 88FEC/520/2436 0317264 CONTRIBUTION	DALLAS ROSEWOOD HOTELS INC	TX 75201 APRIL QUARTERLY	NON-PARTY NON-QUALIFIED PRIMARY 4MAR88		1,000
HUNT, CAROLINE ROSE PRESIDENT'S DINNER/AKA 1988 REPUB SENATE-HOUSE DINNER CMTE 88FEC/534/4522 0399228 CONTRIBUTION	DALLAS	TX 75201 JULY QUARTERLY	PARTY QUALIFIED PRIMARY 25APR88		12,000
HUNT, CAROLINE ROSE NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS * 88SEN/010/4876 0410980 MEMO(FILER'S % OF CONTRB GIVEN TO JT FR)	DALLAS	TX 75201 JULY QUARTERLY	PARTY QUALIFIED PRIMARY 25APR88		6,000
HUNT, CAROLINE ROSE NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE CONTRIBUTIONS 88HSE/353/1882 0428692 MEMO(FILER'S % OF CONTRB GIVEN TO JT FR)	DALLAS	TX 75201 JULY QUARTERLY	PARTY QUALIFIED PRIMARY 25APR88		6,000
HUNT, CAROLINE ROSE JEFFORDS-WACK VICTORY COMMITTEE 88SEN/013/0152 0451320 CONTRIBUTION	DALLAS ROSEWOOD CORP	TX 75201 JULY QUARTERLY	SENATE PRIMARY 15JUN88		700
HUNT, CHARLES L MR ASKEW FOR US SENATE 88SEN/011/3597 0445752 CONTRIBUTION REF TO INDIVIDUAL	MIAMI	FL 33129 JULY QUARTERLY	SENATE PRIMARY 20JUN88		32-
HUNT, D H CONGRESSMAN JOE BARTON COMMITTEE 88HSE/372/2797 0645356 CONTRIBUTION	DALLAS HUNT ENERGY	TX 75201 POST-GENERAL	HOUSE PRIMARY 14NOV88		1,000
HUNT, DALE MR FRIENDS OF PHIL GRAMM 87SEN/007/1266 0140092 CONTRIBUTION	OAKWOOD RICE FARMER	TX 77442 MID-YEAR REPORT	SENATE PRIMARY 16JUN87		500
HUNT, DAVID A WASHINGTON STATE REPUBLICAN FEDERAL CAMPAIGN COMMITTEE 88FEC/572/1370 0645825 CONTRIBUTION	TACOMA CLOTHIER	POST-GENERAL	PARTY QUALIFIED PRIMARY 19OCT88		1,050
HUNT, DEAN HARRIS TO CONGRESS COMMITTEE 88HSE/348/2168 0321933 CONTRIBUTION	LEXINGTON ATTORNEY	KY 40523 APRIL QUARTERLY	HOUSE PRIMARY 11MAR88		1,000
HUNT, DELLA C GEORGE BUSH FOR PRESIDENT, INC 87FEC/488/2744 0116871 CONTRIBUTION	PIKEVILLE	KY 41501 OCTOBER QUARTERLY	PRESIDENTIAL PRIMARY 21SEP87		1,000
HUNT, DENNIS FRIENDS OF MARRILLION	LOS ANGELES	CA 90025 JULY QUARTERLY	HOUSE PRIMARY		1,000

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88HSE/355/5007 0423622 CONTRIBUTION		DAILVEY AND MATHER		28MAY88		
HUNT, DENNIS M DURENBERGER FOR U S SENATE VOLUNTEER COMMITTEE 88SEN/003/2536 0250388 CONTRIBUTION		ROSEVILLE	MN 55113	SENATE YEAR-END 28AUG87	PRIMARY	1,000
HUNT, DENNIS M MINNESOTA TRUCK OPERATORS' NON-PARTISAN COMMITTEE 88FEC/321/0952 0317259 CONTRIBUTION		ROSEVILLE HUNT TRUCK LINES INC	MN 55113	NON-PARTY QUALIFIED APRIL QUARTERLY 27JAN88	PRIMARY	500
HUNT, DIANE C DUKAKIS FOR PRESIDENT COMMITTEE, INC 88FEC/531/0285 0365022 CONTRIBUTION		ORINDA WALL STREET TRADING GROUP	CA 94563	PRESIDENTIAL JUNE MONTHLY 30MAY88	PRIMARY	1,000
HUNT, DONALD HARRIS GOVERNMENT AFFAIRS FUND 88FEC/550/3508 0498595 CONTRIBUTION		HINSDALE HARRIS TRUST & SAVINGS BANK	IL 60521	NON-PARTY QUALIFIED OCTOBER QUARTERLY 9NOV88	PRIMARY	500
HUNT, DONALD S HARRIS GOVERNMENT AFFAIRS FUND 88FEC/501/5072 0209376 CONTRIBUTION		HINSDALE HARRIS TRUST & SAVINGS BANK	IL 60521	NON-PARTY QUALIFIED YEAR-END 21JUL87	PRIMARY	500
HUNT, DONLEY F FRIENDS OF PAUL TRIBLE 88SEN/004/0181 0235044 CONTRIBUTION REF TO INDIVIDUAL		ALEXANDRIA	VA 22307	SENATE YEAR-END 12DEC87	PRIMARY	125-
HUNT, DONLEY F FRIENDS OF PAUL TRIBLE 88SEN/014/0139 0459868 CONTRIBUTION REF TO INDIVIDUAL		ALEXANDRIA	VA 22307	SENATE MID-YEAR REPORT 17FEB88	PRIMARY	25-
HUNT, E CHARLES NATIONAL RESTAURANT ASSOCIATION POLITICAL ACTION COMMITTEE 88FEC/503/1279 0221558 CONTRIBUTION		WHITE PLAINS THE AMERICAN RESTAURANT GROUP	NY 10601	NON-PARTY QUALIFIED YEAR-END 80CT87	PRIMARY	500
HUNT, E CHARLES NATIONAL RESTAURANT ASSOCIATION POLITICAL ACTION COMMITTEE 88FEC/536/1714 0433805 CONTRIBUTION		WHITE PLAINS OLLIVERS RESTAURANT CORPORATION	NY 10601	NON-PARTY QUALIFIED JULY QUARTERLY 4NOV88	PRIMARY	500
HUNT, E CHARLES NATIONAL RESTAURANT ASSOCIATION POLITICAL ACTION COMMITTEE 88FEC/552/4871 0508228 CONTRIBUTION		WHITE PLAINS OLLIVERS RESTAURANT CORPORATION	NY 10601	NON-PARTY QUALIFIED OCTOBER QUARTERLY 30NOV88	PRIMARY	500
HUNT, EMMETT L FRIENDS OF PAUL TRIBLE 88SEN/014/0355 0461160 CONTRIBUTION REF TO INDIVIDUAL		PRATTS	VA 22731	SENATE MID-YEAR REPORT 22FEB88	PRIMARY	15-
HUNT, EMERY JR CITIZENS FOR ERNIED DAVIS KRAMER		BLAIR	NE 68008	SENATE APRIL QUARTERLY	PRIMARY	1,000

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FRIENDS OF SENATOR DAVID KARNES — APRIL QUARTERLY — PRIMARY — 1,000
88SEN/007/3150 0324936 CONTRIBUTION — 29APR88

HUNT, EMORY JR — BLAIR — NE 68008 SENATE — GENERAL — 1,000
FRIENDS OF SENATOR DAVID KARNES — OCTOBER QUARTERLY — 15JUL86
88SEN/019/2545 0605526 CONTRIBUTION

HUNT, ERNEST C JR MR — CHARLOTTE — NC 28226 PRESIDENTIAL — PRIMARY — 500
DOLE FOR PRESIDENT COMMITTEE INC — APRIL MONTHLY — 29APR88
88FEC/517/1794 0293193 CONTRIBUTION

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HUNT, F N ANDY IRELAND CAMPAIGN COMMITTEE 87HSE/338/1832 0170795 CONTRIBUTION REF TO INDIVIDUAL		LAKE WALES	FL 33853	HOUSE MID-YEAR REPORT 20JAN87	PRIMARY	100- AMENDMENT
HUNT, FOREST J MR REPUBLICAN NATIONAL COMMITTEE - CONTRIBUTIONS (AKA REPUBLICAN NATIONAL FINANCE COMMITTEE 87FEC/474/2500 0040402 CONTRIBUTION	HUNT CONSULTING SERVICES	SAKJUAN CAPISTRANO	CA 92675	PARTY QUALIFIED JULY QUARTERLY 6JUN87	PRIMARY	550
HUNT, FRANCES G AMERICANS FOR ROBERTSON INC 87FEC/487/2776 0097875 CONTRIBUTION		DALLAS	TX 75216	PRESIDENTIAL OCTOBER QUARTERLY 88EP86	PRIMARY	500
HUNT, FRANK R JR FRIENDS OF CONNIE MACK 88SEN/019/0255 0552070 CONTRIBUTION				SENATE OCTOBER QUARTERLY 26JUN88	PRIMARY	1,000
HUNT, GARY DAVE BAKER FOR CONGRESS 88HSE/346/2021 0282478 CONTRIBUTION	THE IRVINE CO	CORONA DEL MAR	CA 92625	HOUSE APRIL QUARTERLY 29APR88	PRIMARY	500
HUNT, GARY A MR DOLE FOR PRESIDENT COMMITTEE INC 88FEC/490/0564 0193361 CONTRIBUTION	BAKER	YONKERS	NY 10705	PRESIDENTIAL YEAR-END 23DEC87	PRIMARY	500
HUNT, GARY D FRIENDS OF GARY HART-1988 INC 87FEC/476/0202 0055877 CONTRIBUTION	KARL, LORMAN VIDEO	IRVINE	CA 92714	PRESIDENTIAL JULY QUARTERLY 28DEC86	PRIMARY	750
HUNT, GARY D FRIENDS OF GARY HART-1988 INC 88FEC/511/0035 0213927 CONTRIBUTION REF TO INDIVIDUAL				PRESIDENTIAL FEBRUARY MONTHLY 27JAN88	PRIMARY	750-
HUNT, GARY D CITIZENS FOR TOWNSEND 88HSE/357/2543 0452089 CONTRIBUTION REF TO INDIVIDUAL		IRVINE	CA 92714	HOUSE MID-YEAR REPORT 27JAN88	PRIMARY	1,000-
HUNT, GARY H		CORONA DEL MAR	CA 92625	HOUSE		

DAVE BAKER FOR CONGRESS 88HSE/356/2727 0416621 CONTRIBUTION	IRVINE CO	JULY QUARTERLY 23MAY88	PRIMARY	500
HUNT, GARY H FRIENDS OF SENATOR DAVID KARNES 88SEN/025/1286 0622307 CONTRIBUTION	CORONA DEL MAR IRVINE COMPANY	CA 92625 SENATE POST-GENERAL 26OCT88	GENERAL	500
HUNT, GARY H MR GEORGE BUSH FOR PRESIDENT, INC 88FEC/505/0826 0182166 CONTRIBUTION	NEWPORT BEACH	CA 92660 PRESIDENTIAL YEAR-END 26OCT87	PRIMARY	2,000

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HUNT, GARY H MR GEORGE BUSH FOR PRESIDENT, INC 88FEC/505/0826 0182167 CONTRIBUTION		NEWPORT BEACH	CA 92660 PRESIDENTIAL YEAR-END 16DEC87	PRIMARY	1,000-
HUNT, GARY H MR CALIFORNIANS FOR PETE WILSON 1994 88SEN/018/2451 0592459 CONTRIBUTION		CORONA DEL MAR	CA 92625 SENATE OCTOBER QUARTERLY 15SEP88	GENERAL	1,000
HUNT, GAYLE MRS TEXAS REPUBLICAN CONGRESSIONAL COMMITTEE A/K/A VICTORY '88 88FEC/555/4507 0527636 CONTRIBUTION		EL PASO	TX 79904 PARTY QUALIFIED OCTOBER QUARTERLY 95EP88	PRIMARY	5,000
HUNT, GUY MR STAN MCDONALD FOR CONGRESS CAMPAIN 88HSE/371/4374 0669230 CONTRIBUTION		HOLLY POND STATE OF ALABAMA	AL 35083 HOUSE POST-GENERAL 24OCT88	GENERAL	750
HUNT, H L MR TEXAS REPUBLICAN CONGRESSIONAL COMMITTEE A/K/A VICTORY '88 88FEC/555/4481 0527466 CONTRIBUTION		DALLAS	TX PARTY QUALIFIED OCTOBER QUARTERLY 23AUG88	PRIMARY	5,000
HUNT, H L MRS GEORGE BUSH FOR PRESIDENT, INC 87FEC/470/0849 0022906 CONTRIBUTION		DALLAS HIDDN	TX 75202 PRESIDENTIAL APRIL QUARTERLY 14JUL86	PRIMARY	750
HUNT, H L MRS FUND FOR AMERICA'S FUTURE, INC; THE 87FEC/480/3655 0084582 CONTRIBUTION		DALLAS	TX 75283 NON-PARTY QUALIFIED MID-YEAR REPORT 17FEB87	PRIMARY	5,000
HUNT, H L MRS SENATOR LLOYD BENTSEN ELECTION COMMITTEE 87SEN/007/2977 0145466 CONTRIBUTION		DALLAS HOUSEWIFE	TX 75214 SENATE MID-YEAR REPORT 18MAY87	PRIMARY	1,000
HUNT, H L MRS SENATOR LLOYD BENTSEN ELECTION COMMITTEE 87SEN/007/2977 0145467 CONTRIBUTION		DALLAS HOUSEWIFE	TX 75214 SENATE MID-YEAR REPORT 18MAY87	GENERAL	1,000
HUNT, H L MRS		DALLAS	TX 75202 NON-PARTY QUALIFIED		

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HUNT OIL COMPANY POLITICAL ACTION COMMITTEE 88FEC/501/3857 8171673 CONTRIBUTION	HUNT OIL COMPANY	YEAR-END 31DEC87	PRIMARY	5,000
HUNT, H L MRS STEVE BARTLETT CONGRESSIONAL CAMPAIGN COMMITTEE 88HSE/343/0259 8278897 CONTRIBUTION	DALLAS HOMEMAKER	TX 75214 HOUSE YEAR-END 23OCT87	PRIMARY	1,000
HUNT, H L MRS FRIENDS OF PHIL GRAMM 88SEN/014/1934 8443333 CONTRIBUTION	DALLAS HOUSEWIFE	TX 75202 SENATE MID-YEAR REPORT 16JUN88	PRIMARY	1,000

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HUNT, H L MRS FRIENDS OF PHIL GRAMM 88SEN/014/1934 8443334 CONTRIBUTION		DALLAS HOUSEWIFE	TX 75202 SENATE MID-YEAR REPORT 16JUN88	GENERAL	1,000
HUNT, H L MRS REPUBLICAN NATIONAL COMMITTEE - CONTRIBUTIONS (AKA REPUBLICAN NATIONAL FINANCE COMMITTEE 88FEC/552/1095 8513456 CONTRIBUTION		SEABROOK HOUSEWIFE	TX 77586 PARTY QUALIFIED OCTOBER QUARTERLY 21JUL88	PRIMARY	10,000
HUNT, HANNA LARRY TUTTLE FOR CONGRESS 88HSE/363/1545 8607893 CONTRIBUTION		WASHINGTON CONSULTANT	DC 20003 HOUSE OCTOBER QUARTERLY 15OCT88	GENERAL	1,000
HUNT, HENRY H UNITED TECHNOLOGIES CORPORATION, POLITICAL ACTION COMMITTEE 88FEC/526/3394 8351563 CONTRIBUTION		GLASTONBURY PRATT & WHITNEY - ENGINEERING - CT	CT 06033 NON-PARTY QUALIFIED MAY MONTHLY 04MAY88	PRIMARY	500
HUNT, HOUSTON BUNKER DALLAS COUNTY VICTORY '88 COMMITTEE 88FEC/570/3001 8644115 CONTRIBUTION		DALLAS INVESTMENTS OIL & GAS	TX 75201 PARTY NON-QUALIFIED POST-GENERAL 28NOV88	PRIMARY	1,000
HUNT, HUGH UNITED STATES TELEPHONE ASS'N PAC (FORMERLY-UNITED STATESINDEPENDENT TELEPHONE ASS'N PAC 88FEC/526/3044 8347006 CONTRIBUTION		BLAIR HUNTEL TEL CO	NE 68008 NON-PARTY QUALIFIED MAY MONTHLY 04MAY88	PRIMARY	1,000
HUNT, HUGH W MARKEY FOR CONGRESS COMMITTEE 87HSE/335/1827 8155667 CONTRIBUTION		BLAIR HUNTEL SYSTEMS	NE 68008 HOUSE MID-YEAR REPORT 16JUN87	PRIMARY	500
HUNT, HUGH W FRIENDS OF SENATOR DAVID KARNES 88SEN/006/1383 8279370 CONTRIBUTION		BLAIR HUNTEL SYSTEMS	NE 68008 SENATE YEAR-END 29JUL87	PRIMARY AMENDMENT	1,000
HUNT, HUGH W HAL DAUB FOR SENATE COMMITTEE 87SEN/009/2100 8318728 CONTRIBUTION		BLAIR HUNTEL PHONE CO	NE 68008 SENATE MID-YEAR REPORT 23JUN87	PRIMARY AMENDMENT	1,000
HUNT, HUGH W		BLAIR	NE 68008 HOUSE		

JERRY SCHENKEN FOR CONGRESS 88HSE/347/3995 0322375 CONTRIBUTION	HUNTEL SYSTEMS	APRIL QUARTERLY 16FEB88	PRIMARY	500
HUNT, HUGH W FRIENDS OF SENATOR DAVID KEMMES 88SEN/019/2545 0605527 CONTRIBUTION	BLAIR HUNTEL SYSTEMS	*NE 68008 SENATE OCTOBER QUARTERLY 15JUL88	GENERAL	1,000
HUNT, INA L BUKACIS FOR PRESIDENT COMMITTEE, INC 88FEC/490/3079 0174708 CONTRIBUTION	SACRAMENTO HOMEMAKER	CA 95817 PRESIDENTIAL YEAR-END 21DEC87	PRIMARY	1,000

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HUNT, IRENE MONDALE FOR PRESIDENT COMMITTEE INC 85FEC/355/2533 0001098 CONTRIBUTION REF TO INDIVIDUAL		CLEARWATER	FL 33519 PRESIDENTIAL APRIL QUARTERLY 26FEB85	PRIMARY	300-
HUNT, IRENE M DR NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS * 88SEN/010/4045 0409734 CONTRIBUTION		PASADENA	CA 91104 PARTY QUALIFIED JULY QUARTERLY 9MAY88	PRIMARY	600
HUNT, IRENE MRS DNC SERVICES CORPORATION/DEMOCRATIC NATIONAL COMMITTEE 82FEC/357/0547 0586655 CONTRIBUTION		CLEARWATER CHARLES-SIMS-PUBLISH	FL 34625 PARTY QUALIFIED OCTOBER MONTHLY 21SEP88	PRIMARY	500
HUNT, IRENE MRS DNC SERVICES CORPORATION/DEMOCRATIC NATIONAL COMMITTEE 88FEC/369/2547 0675610 CONTRIBUTION		CLEARWATER CHARLES-SIMS-PUBLISH	FL 34625 PARTY QUALIFIED POST-GENERAL 4NOV88	PRIMARY	1,000
HUNT, IRENE MRS DNC SERVICES CORPORATION/DEMOCRATIC NATIONAL COMMITTEE 88FEC/369/2547 0675611 CONTRIBUTION		CLEARWATER CHARLES-SIMS-PUBLISH	NC 34625 PARTY QUALIFIED POST-GENERAL 1NOV88	PRIMARY	1,000
HUNT, J C/BILL TOLLEY FOR CONGRESS COMMITTEE HARRIS CORPORATION-FEDERAL POLITICAL ACTION COMMITTEE 88FEC/333/2192 0384726 EARMARKED INTERMEDIARY TREASURY OUT			NON-PARTY QUALIFIED JULY QUARTERLY 29JUL88	PRIMARY	800
HUNT, J C/HARRIS CORPORATION-FEDERAL POLITICAL ACT BILL TOLLEY FOR CONGRESS COMMITTEE 88HSE/355/1741 0429812 EARMARKED CONTRIBUTION			HOUSE JULY QUARTERLY 6AUG88	PRIMARY	800
HUNT, JACK R MR DOLE FOR PRESIDENT COMMITTEE INC 88FEC/514/0154 0261375 CONTRIBUTION		AUGUSTA REALTOR	KS 67010 PRESIDENTIAL MARCH MONTHLY 23FEB88	PRIMARY	850
HUNT, JAMES LAROUCHE CAMPAIGN 87FEC/489/4039 0160937 LOAN REPAYMENTS MADE TO INDIVIDUAL		MAPLE SHADE	NJ 08052 PRESIDENTIAL OCTOBER QUARTERLY 16JUL87	PRIMARY	100

HUNT, JAMES — MAPLE SHADE — NJ 08052 PRESIDENTIAL

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HUNT, [illegible] LAROUCHE CAMPAIGN 87FEC/489/4039 8160938 LOAN REPAYMENTS MADE TO INDIVIDUAL	[illegible]	[illegible]	[illegible] PRESIDENTIAL OCTOBER QUARTERLY 16JUL87	PRIMARY	50
HUNT, JAMES LAROUCHE CAMPAIGN 87FEC/489/4039 8160939 LOAN REPAYMENTS MADE TO INDIVIDUAL	MAPLE SHADE	NJ 08052 PRESIDENTIAL OCTOBER QUARTERLY 16JUL87		PRIMARY	50
HUNT, JAMES A CHABOT FOR CONGRESS COMMITTEE 88HSE/366/1601 8638700 CONTRIBUTION	CINCINNATI HUNT DEVELOPMENT	OH 45202 HOUSE PRE-GENERAL 5OCT88		GENERAL	800
HUNT, JAMES B JR TERRY SANFORD FOR U S SENATE 88SEN/014/2750 8456373 CONTRIBUTION	RALEIGH POYNER & SPRUILL	NC 27605 SENATE MID-YEAR REPORT 4MAR88		SPECIAL	900
HUNT, JAMES B JR MR ALBERT GORE JR FOR PRESIDENT COMMITTEE INC 88FEC/506/4066 8211361 CONTRIBUTION	RALEIGH POYNER & SPRUILL	NC 27605 PRESIDENTIAL FEBRUARY MONTHLY 25JAN88		PRIMARY	500
HUNT, JAMES L COMMITTEE TO RE-ELECT BARBARA BOXER TO CONGRESS 88HSE/361/3675 8516412 CONTRIBUTION	SAN FRANCISCO MCCUTCHEN DOYLE BROWN & ENERSEN	CA 94123 HOUSE OCTOBER QUARTERLY 12SEP88		GENERAL	500
HUNT, JAMES P JR HON NORTH CAROLINA STATE DEMOCRATIC EXECUTIVE COMMITTEE 87FEC/482/0255 8094824 CONTRIBUTION	RALEIGH SPRUILL, SPRUILL ET AL	NC 27605 PARTY QUALIFIED MID-YEAR REPORT 18FEB87		PRIMARY	500
HUNT, JAMES W HALL FOR CONGRESS COMMITTEE (RALPH HALL - ROCKWALL, TEXAS) 88HSE/343/0081 8271532 CONTRIBUTION	DALLAS OIL BUSINESS	TX 75219 HOUSE YEAR-END 20NOV87		PRIMARY	500
HUNT, JANE A FRIENDS OF SENATOR DAVID KARNES 88SEN/006/1384 8279371 CONTRIBUTION	BLAIR HOUSEWIFE	NE 68008 SENATE YEAR-END 19NOV87		PRIMARY AMENDMENT	800
HUNT, JANE A KILDEE FOR CONGRESS COMMITTEE 88HSE/357/5673 8475015 CONTRIBUTION	BLAIR	NE HOUSE JULY QUARTERLY 4AUG88		PRIMARY	500
HUNT, JANE A FRIENDS OF SENATOR DAVID KARNES 88SEN/019/2545 8605529 CONTRIBUTION	BLAIR HOUSEWIFE	NE 68008 SENATE OCTOBER QUARTERLY 15JUL88		GENERAL	1,000
HUNT, JANET M MRS GEPHARDT FOR PRESIDENT COMMITTEE INC 88FEC/522/0075 8312539 CONTRIBUTION	ST LOUIS HOUSEWIFE	MO 63127 PRESIDENTIAL APRIL MONTHLY 1MAR88		PRIMARY	500

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HUNT, JANYCE JERRY SCHENKEN FOR CONGRESS 88HSE/347/4002 0322401 CONTRIBUTION	BLAIR HOUSEWIFE	NE 68009 HOUSE APRIL QUARTERLY 24FEB88	PRIMARY	1,000
HUNT, JANYCE JERRY SCHENKEN FOR CONGRESS 88HSE/262/1395 0551916 CONTRIBUTION	BLAIR HOUSEWIFE	NE 68009 HOUSE OCTOBER QUARTERLY 4NOV88	GENERAL	1,000
HUNT, JANYCE FRIENDS OF SENATOR DAVID KARNES 88SEN/019/2545 0660528 CONTRIBUTION	BLAIR HOUSEWIFE	NE 68009 SENATE OCTOBER QUARTERLY 4NOV88	GENERAL	1,000

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CONTRIBUTOR/LENDER/TRANSFERRER REPORTING ENTITY MICROFILM LOCATION TRANSACTION TYPE	STREET ADDRESS	CITY	STATE ZIP TYPE OF FILER REPORT TYPE DATE	ELECTION	AMOUNT
HUNT, JANYCE MS PAUL SIMON FOR PRESIDENT 88FEC/506/0200 0179360 CONTRIBUTION		BLAIR HOUSEWIFE	NE 68008 PRESIDENTIAL YEAR-END 14DEC87	PRIMARY	590
HUNT, JEAN A FRIENDS OF PAUL TRIBLE 88SEN/004/0111 0234624 CONTRIBUTION REF TO INDIVIDUAL		BOWLING GREEN	VA 22427 SENATE YEAR-END 1[illegible]CT87	PRIMARY	12-
HUNT, JEANETTE HAL DAUB FOR SENATE COMMITTEE 88SEN/008/1611 0322629 CONTRIBUTION		BLAIR HOMEMAKER	NE 68008 SENATE APRIL QUARTERLY 4NOV88	PRIMARY	1,000
HUNT, JOANNE JAMESON MRS GEORGE BUSH FOR PRESIDENT, INC 88FEC/505/1623 0186781 CONTRIBUTION		NEWPORT BEACH	CA 92660 PRESIDENTIAL YEAR-END 18DEC87	PRIMARY	1,000
HUNT, JOHN INDIANA DEMOCRATIC CONGRESSIONAL VICTORY COMMITTEE 88FEC/552/3262 0519436 CONTRIBUTION		LOGANSPORT	IN 47953 PARTY QUALIFIED OCTOBER QUARTERLY 14SEP88	PRIMARY	500
HUNT, JOHN C MR GEORGE BUSH FOR PRESIDENT, INC 88FEC/511/0504 0210169 CONTRIBUTION		ATLANTA AZTEC CORP	GA 30327 PRESIDENTIAL FEBRUARY MONTHLY 25JAN88	PRIMARY	500
HUNT, JOHN E BILL GRANT CAMPAIGN FUND 88HSE/342/2618 0244913 CONTRIBUTION		TALLAHASSEE CEO INSURANCE GROUP	FL 32308 HOUSE YEAR-END 23OCT87	PRIMARY	600
HUNT, JOHN E SR ASKEW FOR US SENATE 88SEN/007/2629 0375185 CONTRIBUTION		TALLAHASSEE HUNT INSURANCE GROUP	FL 32317 SENATE APRIL QUARTERLY 30APR88	PRIMARY	1,000
HUNT, JOHN E SR MR ASKEW FOR US SENATE 88SEN/011/3718 0447376 CONTRIBUTION REF TO INDIVIDUAL		TALLAHASSEE	FL 32317 SENATE JULY QUARTERLY 21JUL88	PRIMARY	320-

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HUNT, JOHN F MR LAUTENBERG COMMITTEE 88SEN/018/0926 8600637 CONTRIBUTION	UPPER MONTCLAIR ATTORNEY	NJ 07043 SENATE OCTOBER QUARTERLY 13SEP88	GENERAL	1,000
HUNT, JOHN T CHICAGO BOARD OF OPTIONS EXCHANGE INC PAC 87FEC/492/1472 8126564 CONTRIBUTION	ORLAND PARK MARKET MAKER	IL 60462 NON-PARTY QUALIFIED OCTOBER MONTHLY 14SEP87	PRIMARY	5,000
HUNT, JOHN T EFFECTIVE GOVERNMENT COMMITTEE 88FEC/552/2633 8509120 CONTRIBUTION	ORLAND PARK CHICAGO RESEARCH & TRADING CORP	IL 60462 NON-PARTY QUALIFIED OCTOBER QUARTERLY 17NOV88	PRIMARY	5,000

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CONTRIBUTOR/LENDER/TRANSFERRER REPORTING ENTITY MICROFILM LOCATION	STREET ADDRESS TRANSACTION TYPE	CITY	STATE ZIP REPORT TYPE DATE	TYPE OF FILER ELECTION	AMOUNT
HUNT, JOHN T COMMODITY FUTURES POLITICAL FUND OF THE CHICAGO MERCANTILE EXCHANGE 86FEC/576/5445 8672000 CONTRIBUTION		ORLAND PARK CRT	IL 60462 NON-PARTY QUALIFIED YEAR-END 10DEC88	PRIMARY	2,000
HUNT, JOHN T JR DOLE FOR PRESIDENT COMMITTEE INC 87FEC/488/0306 8123861 CONTRIBUTION		ORLAND PARK	IL 60462 PRESIDENTIAL OCTOBER QUARTERLY 26AUG87	PRIMARY	1,000
HUNT, JOHN T JR GEPHARDT FOR PRESIDENT COMMITTEE INC 87FEC/488/3974 8126790 CONTRIBUTION		ORLAND PARK	IL 60462 PRESIDENTIAL OCTOBER QUARTERLY 30SEP87	PRIMARY	1,000
HUNT, JOHN T JR AUCTION MARKETS POLITICAL ACTION COMMITTEE OF THE CHICAGO BOARD OF TRADE A/K/A AMPAC/CBT 88FEC/500/1029 8168863 CONTRIBUTION		ORLAND PARK CRT SERVICES INC	IL 60462 NON-PARTY QUALIFIED YEAR-END 31DEC87	PRIMARY	5,000
HUNT, JOHN T JR FRIENDS OF SENATOR DAVID KARNES 88SEN/007/3150 8324937 CONTRIBUTION		ORLAND PARK CRT	IL 60462 SENATE APRIL QUARTERLY 7NOV88	PRIMARY	1,000
HUNT, JOSEPH F PETE DAWKINS FOR SENATE 88SEN/008/1469 8320056 CONTRIBUTION		SUMMIT FIRST BOSTON CORP	NJ 07901 SENATE APRIL QUARTERLY 11FEB88	PRIMARY	500
HUNT, JOSEPH J JR GEPHARDT FOR PRESIDENT COMMITTEE INC 87FEC/425/5315 8032293 CONTRIBUTION		ST LOUIS IRONWORKERS INTL	MO 63127 PRESIDENTIAL APRIL QUARTERLY 23FEB87	PRIMARY	500
HUNT, JUNE M PETE DAWKINS FOR SENATE 88SEN/008/1470 8320058 CONTRIBUTION		CONVENT STATION HOUSEWIFE	NJ 07961 SENATE APRIL QUARTERLY 21NOV88	PRIMARY	600
HUNT, K NEAL MR FETZER FOR CONGRESS COMMITTEE 88HSE/343/1337 8262561 CONTRIBUTION		RALEIGH HUNT PROPERTIES	NC 27612 HOUSE YEAR-END 29JUL87	PRIMARY	1,000

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HUNT, K NEAL MR FETZER FOR CONGRESS COMMITTEE 88HSE/343/1372 0266175 CONTRIBUTION REF TO INDIVIDUAL	RALEIGH	NC HOUSE YEAR-END 30NOV87	PRIMARY	40-
HUNT, K W DUKAKIS FOR PRESIDENT COMMITTEE, INC 88FEC/490/3079 0174706 CONTRIBUTION	SACRAMENTO HUNT PROPERTIES	CA 95817 PRESIDENTIAL YEAR-END 21DEC87	PRIMARY	1,000
HUNT, KAREN B FRIENDS OF SENATOR DAVID KARNES 88SEN/007/3150 0324938 CONTRIBUTION	BLAIR HUNTEL SYSTEMS	NE 68008 SENATE APRIL QUARTERLY 23JAN88	PRIMARY	771

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HUNT, KAREN B FRIENDS OF SENATOR DAVID KARNES 88SEN/019/2545 0405530 CONTRIBUTION		BLAIR HUNTEL SYSTEMS	NE 68008 SENATE OCTOBER QUARTERLY 15JUL88	GENERAL	1,000
HUNT, KAREN E VICTORY '88 COMMITTEE 88FEC/575/2906 0457229 CONTRIBUTION		NEW YORK	NY 10017 PARTY QUALIFIED POST-GENERAL 31OCT88	PRIMARY	1,000
HUNT, L ALVIN WEST VIRGINIA TRIAL LAWYERS ASSOCIATION LAWYERS POLITICAL ACTION COMMITTEE 88FEC/554/0977 0401019 CONTRIBUTION		CHAS HUNT & WILSON LAWYERS	WV 25329 NON-PARTY NON-QUALIFIED OCTOBER QUARTERLY 26SEP88	PRIMARY	625
HUNT, LACY H MR DOLE FOR PRESIDENT COMMITTEE INC 88FEC/506/4393 0208712 CONTRIBUTION		PHILADELPHIA	PA 19103 PRESIDENTIAL FEBRUARY MONTHLY 21JAN88	PRIMARY	1,000
HUNT, LAMAR MR JACK KEMP FOR PRESIDENT 87FEC/475/3346 0045551 CONTRIBUTION		DALLAS	TX 75201 PRESIDENTIAL JULY QUARTERLY 10JUN87	PRIMARY	1,000
HUNT, LAMAR MR JACK KEMP FOR PRESIDENT 88FEC/511/3812 0258886 CONTRIBUTION		DALLAS	TX 75229 PRESIDENTIAL MARCH MONTHLY 23FEB88	PRIMARY	1,000
HUNT, LAMAR MR JACK KEMP FOR PRESIDENT 88FEC/539/5377 0468917 CONTRIBUTION REF TO INDIVIDUAL		DALLAS	TX 75229 PRESIDENTIAL AUGUST MONTHLY 20JUL88	PRIMARY	1,000-
HUNT, LAMAR MR CAMPAIGN FOR A NEW MAJORITY (FEDERAL) (FKA CAMPAIGN FOR PROSPERITY) 88FEC/552/0452 0501370 CONTRIBUTION		DALLAS	TX 75201 NON-PARTY QUALIFIED OCTOBER QUARTERLY 12JUL88	PRIMARY	5,000
HUNT, LAMAR MRS JACK KEMP FOR PRESIDENT 87FEC/475/3346 0045554 CONTRIBUTION		DALLAS	TX 75229 PRESIDENTIAL JULY QUARTERLY 10JUN87	PRIMARY	1,000

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HUNT, LAMAR MRS JACK KEMP FOR PRESIDENT 88FEC/511/2812 0250887 CONTRIBUTION	DALLAS	TX 75229	PRESIDENTIAL MARCH MONTHLY 23FEB88	PRIMARY	1,000
HUNT, LAMAR MRS JACK KEMP FOR PRESIDENT 88FEC/539/5377 0468920 CONTRIBUTION REF TO INDIVIDUAL	DALLAS	TX 75229	PRESIDENTIAL AUGUST MONTHLY 20JUL88	PRIMARY	1,000-
HUNT, LAURA B MRS REPUBLICAN NATIONAL COMMITTEE - CONTRIBUTIONS (AKA REPUBLICAN NATIONAL FINANCE COMMITTEE 88FEC/534/3906 0402276 CONTRIBUTION	DALLAS INVESTOR	TX 75205	PARTY QUALIFIED JULY QUARTERLY 25APR88	PRIMARY	5,000

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HUNT, LAWRENCE H JR ILLINOIS REPUBLICAN STATE CENTRAL COMMITTEE 88FEC/552/3203 0519047 CONTRIBUTION		MINNETKA SIDLEY & AUSTIN	IL 60093 OCTOBER QUARTERLY 24SEP88	PARTY QUALIFIED PRIMARY	500
HUNT, LEIGH F MRS ASKEW FOR US SENATE 88SEN/011/3603 0445826 CONTRIBUTION REF TO INDIVIDUAL		TAMPA	FL 33606 JULY QUARTERLY 17JUN88	SENATE PRIMARY	9-
HUNT, MARGARET UTAH POWER & LIGHT COMPANY POLITICAL ACTION COMMITTEE - FEDERAL 87FEC/481/2733 0129944 CONTRIBUTION REF TO INDIVIDUAL		S L C	UT 84103 TERMINATION REPORT 30JUL87	NON-PARTY QUALIFIED PRIMARY	67-
HUNT, MARGOT BONIE DUKAKIS FOR PRESIDENT COMMITTEE, INC 88FEC/511/4063 0258158 CONTRIBUTION		SWARTHMORE HOUSEWIFE	PA 19081 MARCH MONTHLY 28FEB88	PRESIDENTIAL PRIMARY	500
HUNT, MARGOT BONIE DUKAKIS FOR PRESIDENT COMMITTEE, INC 88FEC/522/4479 0336925 CONTRIBUTION		SWARTHMORE HOMEMAKER	PA 19081 MAY MONTHLY 29APR88	PRESIDENTIAL PRIMARY	500
HUNT, MARION FRIENDS OF JIM GARRISON 88HSE/343/1462 0229238 CONTRIBUTION		SANTA MONICA	CA 90405 YEAR-END 23OCT87	HOUSE PRIMARY	500
HUNT, MARION KERREY FOR U S SENATE COMMITTEE 88SEN/019/3116 0568736 CONTRIBUTION		SANTA MONICA	CA 90405 OCTOBER QUARTERLY 29SEP88	SENATE GENERAL	1,000
HUNT, MARION M LEAGUE OF CONSERVATION VOTERS 88FEC/504/4409 0209609 CONTRIBUTION		SANTA MONICA	CA 90405 YEAR-END 10CT87	NON-PARTY QUALIFIED PRIMARY	2,000
HUNT, MARION M LOUISE SLAUGHTER RE-ELECTION COMMITTEE 88HSE/342/2903 0257769 CONTRIBUTION		SANTA MONICA INVESTOR	CA 90405 YEAR-END 31DEC87	HOUSE PRIMARY	1,000

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HUNT, MARION M MIKE LOWRY FOR U S SENATE COMMITTEE 88SEN/021/2725 0611957 CONTRIBUTION	SANTA MONICA	CA 90405 SENATE PRE-GENERAL 20CT88	GENERAL	1,000
HUNT, MARION M MISSISSIPPIANS FOR WAYNE DOWDY 88SEN/020/3804 0620195 CONTRIBUTION	SANTA MONICA	CA 90405 SENATE PRE-GENERAL 10OCT88	GENERAL	1,000
HUNT, MARY MISSISSIPPIANS FOR WAYNE DOWDY 88SEN/026/1486 0646273 CONTRIBUTION	JACKSON HOUSEWIFE	MS 39205 SENATE POST-GENERAL 27OCT88	GENERAL	1,000

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HUNT, MARY R MS REPUBLICAN NATIONAL COMMITTEE - CONTRIBUTIONS (AKA REPUBLICAN NATIONAL FINANCE COMMITTEE 88FEC/552/1096 0513457 CONTRIBUTION		SOUTH BEND ENVELOPES UNLIMITED	IN 46617 PARTY QUALIFIED OCTOBER QUARTERLY 22NOV88	PRIMARY	2,000
HUNT, MARY REILLY JACK KEMP FOR PRESIDENT 88FEC/505/0074 0178337 CONTRIBUTION		SOUTH BEND MARY REILLY HUNT & ASSOC	IN 46617 PRESIDENTIAL YEAR-END 13OCT87	PRIMARY	500
HUNT, MICHAEL NATHAN ROSENBERG FOR CONGRESS 88HSE/350/3520 0379363 CONTRIBUTION		CAMPBELL	CA 95008 HOUSE PRE-PRIMARY 46PR88	PRIMARY	500
HUNT, N B FRIENDS OF DICK ARMEY 87HSE/337/1805 0152235 CONTRIBUTION		DALLAS HUNT OIL	TX 75201 HOUSE MID-YEAR REPORT 22JUN87	PRIMARY	1,000
HUNT, N B FRIENDS OF DICK ARMEY 87HSE/337/1813 0152269 CONTRIBUTION		DALLAS HUNT OIL	TX HOUSE MID-YEAR REPORT 22JUN87	GENERAL	1,000
HUNT, N B MECHT REELECTION COMMITTEE 88SEN/001/3627 0250772 CONTRIBUTION		DALLAS	TX 75201 SENATE YEAR-END 30SEP87	PRIMARY	1,000
HUNT, N B ROHRABACHER FOR CONGRESS 88HSE/349/3412 0329536 CONTRIBUTION		DALLAS	TX 75201 HOUSE APRIL QUARTERLY 10MAR88	PRIMARY	500
HUNT, N B MR FRIENDS OF VOINOVICH 88SEN/008/2930 0306600 CONTRIBUTION		DALLAS	TX 75201 SENATE APRIL QUARTERLY 22FEB88	PRIMARY	500
HUNT, N B MR A LOT OF FRIENDS TO SEND LINDA BEAN-JONES TO CONGRESS 88HSE/348/0462 0330692 CONTRIBUTION		DALLAS INVESTOR/RANCHER	TX 75291 HOUSE APRIL QUARTERLY 24MAR88	PRIMARY	1,000

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HUNT, NANCIE C MS DOLE FOR PRESIDENT COMMITTEE INC 88FEC/490/0564 0193362 CONTRIBUTION	RINDOES	NJ 08551 PRESIDENTIAL YEAR-END 08DEC87	PRIMARY	1,000
HUNT, NANCY HUNT OIL COMPANY POLITICAL ACTION COMMITTEE 88FEC/501/3857 0171672 CONTRIBUTION	DALLAS HOMEMAKER	TX 75202 NON-PARTY QUALIFIED YEAR-END 31DEC87	PRIMARY	5,000
HUNT, NANCY MARTIN FROST CAMPAIGN COMMITTEE (1988) 88HSE/343/1031 0260875 CONTRIBUTION	DALLAS HOUSEWIFE	TX 75202 HOUSE YEAR-END 93UL87	PRIMARY	1,000

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CONTRIBUTOR/LENDER/TRANSFERRER REPORTING ENTITY MICROFILM LOCATION TRANSACTION TYPE	STREET ADDRESS CITY	STATE ZIP TYPE OF FILER REPORT TYPE DATE	ELECTION	AMOUNT
HUNT, NANCY MARTIN FROST CAMPAIGN COMMITTEE (1988) 88HSE/343/1031 0260876 CONTRIBUTION	DALLAS HOUSEWIFE	TX 75202 HOUSE YEAR-END 93UL87	GENERAL	1,000
HUNT, NANCY PETE DAWKINS FOR SENATE 88SEN/008/1469 0320055 CONTRIBUTION	DALLAS HOUSEWIFE	TX 75202 SENATE APRIL QUARTERLY 11FE988	PRIMARY	1,000
HUNT, NANCY A MRS FUND FOR AMERICA'S FUTURE, INC; THE 87FEC/480/3657 0084599 CONTRIBUTION	DALLAS HOUSEWIFE	TX 75202 NON-PARTY QUALIFIED MID-YEAR REPORT 98UL87	PRIMARY	5,000
HUNT, NANCY A MRS FRIENDS OF PHIL GRAMM 88SEN/014/1934 0443335 CONTRIBUTION	DALLAS HOUSEWIFE	TX 75202 SENATE MID-YEAR REPORT 16JUN88	PRIMARY	1,000
HUNT, NANCY A MRS FRIENDS OF PHIL GRAMM 88SEN/014/1934 0443336 CONTRIBUTION	DALLAS HOUSEWIFE	TX 75202 SENATE MID-YEAR REPORT 16JUN88	GENERAL	1,000
HUNT, NANCY L MS TEXAS REPUBLICAN CONGRESSIONAL COMMITTEE A/K/A VICTORY '88 88FEC/555/4447 0527244 CONTRIBUTION	DALLAS HOMEMAKER	TX PARTY QUALIFIED OCTOBER QUARTERLY 27AUG88	PRIMARY	5,000
HUNT, NELSON B CONSERVATIVE VICTORY COMMITTEE 88FEC/542/3010 0469424 CONTRIBUTION	DALLAS	TX 75201 NON-PARTY QUALIFIED AUGUST MONTHLY 13JUL88	PRIMARY	5,000
HUNT, NELSON B PETE DAWKINS FOR SENATE 88SEN/018/4130 0544453 CONTRIBUTION REF TO INDIVIDUAL	DALLAS	TX 75201 SENATE OCTOBER QUARTERLY 28SEP88	GENERAL	1,000-
HUNT, NELSON B MR AMERICANS FOR ROBERTSON INC 87FEC/487/3964 0099848 CONTRIBUTION	DALLAS OIL AND GAS	TX 75201 PRESIDENTIAL OCTOBER QUARTERLY 13JUL87	PRIMARY	1,000

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HUNT, NELSON BUNKER PETE DAWKINS FOR SENATE 88SEN/008/1470 8220057 CONTRIBUTION	DALLAS HUNT OIL COMPANY	TX 75202 SENATE APRIL QUARTERLY 10FEB88	PRIMARY	1,000
HUNT, NELSON BUNKER DALLAS COUNTY VICTORY '88 COMMITTEE 88FEC/570/3002 8644119 CONTRIBUTION	DALLAS INVESTMENTS OIL & GAS	TX 75201 PARTY NON-QUALIFIED POST-GENERAL 06DEC88	PRIMARY	1,000
HUNT, NOEL C III DR ALBERT GORE JR FOR PRESIDENT COMMITTEE INC 87FEC/475/4485 0030208 CONTRIBUTION	CHATTANOOGA PHYSICIAN	TN 37403 PRESIDENTIAL JULY QUARTERLY 42JUL87	PRIMARY	500

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CONTRIBUTOR/LENDER/TRANSFERRER REPORTING ENTITY MICROFILM LOCATION TRANSACTION TYPE	STREET ADDRESS	CITY	STATE ZIP TYPE OF FILER REPORT TYPE DATE	ELECTION	AMOUNT
HUNT, OLIVE H CITIZENS FOR HUNT 88HSE/342/4986 8276108 CONTRIBUTION		WASHINGTON RETIRED	DC 20016 HOUSE YEAR-END 28OCT87	PRIMARY	1,000
HUNT, OSWALD A COMMITTEE TO RE-ELECT CONGRESSMAN LAGOMARSINO 88HSE/355/0801 8446241 CONTRIBUTION		CARPINTERIA ATTORNEY	CA 93013 HOUSE JULY QUARTERLY 19MAY88	PRIMARY	500
HUNT, OSWALD A COMMITTEE TO RE-ELECT CONGRESSMAN LAGOMARSINO 88HSE/363/3972 8555169 CONTRIBUTION		CARPINTERIA ATTORNEY	CA 93013 HOUSE OCTOBER QUARTERLY 18AUG88	GENERAL	600
HUNT, PATRICK J DUKAKIS FOR PRESIDENT COMMITTEE, INC 87FEC/470/4752 9053659 CONTRIBUTION		WASHINGTON CWA UNION	DC 20003 PRESIDENTIAL JULY QUARTERLY 21MAY87	PRIMARY	500
HUNT, PENELOPE MINNESOTA WOMEN'S CAMPAIGN FUND 88FEC/552/4278 8523604 CONTRIBUTION		MINNEAPOLIS ATTORNEY	MN 55415 NON-PARTY QUALIFIED OCTOBER QUARTERLY 22SEP88	PRIMARY	500
HUNT, PENELOPE A ESQ DNC SERVICES CORPORATION/DEMOCRATIC NATIONAL COMMITTEE 88FEC/557/0547 8586656 CONTRIBUTION		MINNEAPOLIS ATTORNEY	MN 55415 PARTY QUALIFIED OCTOBER MONTHLY 18SEP88	PRIMARY	1,000
HUNT, PETER INDEPENDENT INSURANCE AGENTS OF AMERICA INC POLITICAL ACTION COMMITTEE (INSURPAC) 88FEC/499/2479 8171498 CONTRIBUTION		PORTLAND UNITED INSURANCE GROUP	ME 04104 NON-PARTY QUALIFIED YEAR-END 30DEC87	PRIMARY	500
HUNT, PETER INDEPENDENT INSURANCE AGENTS OF AMERICA INC POLITICAL ACTION COMMITTEE (INSURPAC) 88FEC/553/3749 8518799 CONTRIBUTION		PORTLAND UNITED INSURANCE GROUP	ME 04104 NON-PARTY QUALIFIED OCTOBER MONTHLY 19SEP88	PRIMARY	500
HUNT, PETER F MR GEORGE BUSH FOR PRESIDENT, INC 88FEC/505/0923 8189004 CONTRIBUTION		BUFFALO	NY 14216 PRESIDENTIAL YEAR-END 23DEC87	PRIMARY	500

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HUNT, PETER F MR GEORGE BUSH FOR PRESIDENT, INC 88FEC/505/0473 0183007 CONTRIBUTION	BUFFALO	NY 14216 PRESIDENTIAL YEAR-END 22DEC87	PRIMARY	500
HUNT, PRISCILLA S MR DNC SERVICES CORPORATION/DEMOCRATIC NATIONAL COMMITTEE 88FEC/562/2949 0629699 CONTRIBUTION	CAMBRIDGE	MA 02138 PARTY QUALIFIED PRE-GENERAL 12OCT88	PRIMARY	1,000
HUNT, RANDALL CHRISTOPHER COX FOR CONGRESS 88HSE/349/3176 0341993 CONTRIBUTION	LAGUNA BEACH QUIKSILVER INC	CA 92651 HOUSE APRIL QUARTERLY 29FEB88	PRIMARY	500

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HUNT, RANDALL D ROHRABACHER FOR CONGRESS 88HSE/349/3412 0329537 CONTRIBUTION		LAGUNA BEACH SELF-EMPLOYED	CA 92651 HOUSE APRIL QUARTERLY 14MAR88	PRIMARY	500
HUNT, RANDALL D ROHRABACHER FOR CONGRESS 88HSE/349/3412 0329538 CONTRIBUTION		LAGUNA BEACH SELF-EMPLOYED	CA 92651 HOUSE APRIL QUARTERLY 7MAR88	PRIMARY	500
HUNT, RANDALL MR JACK KEMP FOR PRESIDENT 88FEC/505/0342 0178690 CONTRIBUTION		LAGUNA BEACH QUIKSILVER	CA 92651 PRESIDENTIAL YEAR-END 23NOV87	PRIMARY	500
HUNT, RAY HUNT OIL COMPANY POLITICAL ACTION COMMITTEE 88FEC/501/3857 0171671 CONTRIBUTION		DALLAS HUNT OIL COMPANY	TX 75202 NON-PARTY QUALIFIED YEAR-END 31DEC87	PRIMARY	5,000
HUNT, RAY L GEORGE BUSH FOR PRESIDENT, INC 87FEC/470/0906 0023772 CONTRIBUTION		DALLAS SELF-EMPLOYED	TX 75202 PRESIDENTIAL APRIL QUARTERLY 14JUL86	PRIMARY	750
HUNT, RAY L FRIENDS OF PAUL TRIBLE 87SEN/009/0058 0143304 CONTRIBUTION		DALLAS HUNT OIL COMPANY	TX 75202 SENATE MID-YEAR REPORT 6MAY87	PRIMARY	1,000
HUNT, RAY L MARTIN FROST CAMPAIGN COMMITTEE (1988) 88HSE/343/1031 0260873 CONTRIBUTION		DALLAS HUNT OIL CO	TX 75202 HOUSE YEAR-END 93UL87	PRIMARY	1,000
HUNT, RAY L MARTIN FROST CAMPAIGN COMMITTEE (1988) 88HSE/343/1031 0260874 CONTRIBUTION		DALLAS HUNT OIL CO	TX 75202 HOUSE YEAR-END 93UL87	GENERAL	1,000
HUNT, RAY L PETE DAWKINS FOR SENATE		DALLAS	TX 75202 SENATE APRIL QUARTERLY	PRIMARY	1,000

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[illegible]	HUNT OIL COMPANY	11FEB88		
HUNT, RAY L MR FUND FOR AMERICA'S FUTURE, INC; THE 87FEC/480/3655 0004581 CONTRIBUTION	DALLAS HUNT OIL COMPANY	TX 75283 NON-PARTY QUALIFIED - MID-YEAR REPORT 17FEB87	PRIMARY	5,000
HUNT, RAY L MR FRIENDS OF PHIL GRAMM 87SEN/007/1233 0140263 CONTRIBUTION	DALLAS HUNT OIL COMPANY	TX 75202 SENATE MID-YEAR REPORT 30JN87	PRIMARY	1,000
HUNT, RAY L MR FRIENDS OF PHIL GRAMM 87SEN/007/1233 0140264 CONTRIBUTION	DALLAS HUNT OIL COMPANY	TX 75202 SENATE MID-YEAR REPORT 30JN87	GENERAL	1,000

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HUNT, RAY L MR SENATOR LLOYD BENTSEN ELECTION COMMITTEE 87SEN/007/2977 0145464 CONTRIBUTION		DALLAS HUNT OIL COMPANY	TX 75202 SENATE MID-YEAR REPORT 19MY87	PRIMARY	1,000
HUNT, RAY L MR SENATOR LLOYD BENTSEN ELECTION COMMITTEE 87SEN/007/2977 0145465 CONTRIBUTION		DALLAS HUNT OIL COMPANY	TX 75202 SENATE MID-YEAR REPORT 19MY87	GENERAL	1,000
HUNT, RAY L MR STEVE BARTLETT CONGRESSIONAL CAMPAIGN COMMITTEE 88HSE/343/0259 0278900 CONTRIBUTION		DALLAS HUNT OIL COMPANY	TX 75248 HOUSE YEAR-END 23OCT87	PRIMARY	1,000
HUNT NANCY ANN REPUBLICAN NATIONAL COMMITTEE - CONTRIBUTIONS (AKA REPUBLICAN NATIONAL FINANCE COMMITTEE 88FEC/352/10% 0513458 CONTRIBUTION		DALLAS UNKNOWN	TX 75202 PARTY QUALIFIED OCTOBER QUARTERLY 21JUL88	PRIMARY	10,000
HUNT, RAY L MR REPUBLICAN NATIONAL COMMITTEE - CONTRIBUTIONS (AKA REPUBLICAN NATIONAL FINANCE COMMITTEE 88FEC/352/10% 0513459 CONTRIBUTION		DALLAS HUNT OIL CO	TX 75202 PARTY QUALIFIED OCTOBER QUARTERLY 28JUL88	PRIMARY	10,000
HUNT, RAY L MRS GEORGE BUSH FOR PRESIDENT, INC 87FEC/470/0840 0022428 CONTRIBUTION		DALLAS HOUSEWIFE	TX 75202 PRESIDENTIAL APRIL QUARTERLY 14JUL86	PRIMARY	750
HUNT, RAY L MRS SENATOR LLOYD BENTSEN ELECTION COMMITTEE 87SEN/007/2977 0145468 CONTRIBUTION		DALLAS HOUSEWIFE	TX 75240 SENATE MID-YEAR REPORT 19MY87	PRIMARY	1,000
HUNT, RAY L MRS SENATOR LLOYD BENTSEN ELECTION COMMITTEE 87SEN/007/2977 0145469 CONTRIBUTION		DALLAS HOUSEWIFE	TX 75240 SENATE MID-YEAR REPORT 19MY87	GENERAL	1,000
HUNT, RAY L MRS STEVE BARTLETT CONGRESSIONAL CAMPAIGN COMMITTEE		DALLAS	TX 75248 HOUSE YEAR-END	PRIMARY	1,000

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88HSE/343/0259 0278898 CONTRIBUTION	HOMEMAKER		28DEC87	
HUNT, RAY MR TEXAS REPUBLICAN CONGRESSIONAL COMMITTEE A/K/A VICTORY '88 88FEC/355/4354 0526811 CONTRIBUTION	DALLAS OIL	TX 75201 PARTY QUALIFIED -OCTOBER QUARTERLY 27NOV88	PRIMARY	4,000
HUNT, RICHARD JERRY SCHENKEN FOR CONGRESS 88HSE/347/3995 0322376 CONTRIBUTION	BLAIR HUNTEL SYSTEMS	NE 68008 HOUSE APRIL QUARTERLY 24FEB88	PRIMARY	1,000
HUNT, RICHARD JERRY SCHENKEN FOR CONGRESS 88HSE/362/1583 0351895 CONTRIBUTION	BLAIR HUNTEL SYSTEMS	NE 68008 HOUSE OCTOBER QUARTERLY 4NOV88	GENERAL	1,000

CONTRIBUTOR/LENDER/TRANSFERRER REPORTING ENTITY MICROFILM LOCATION	STREET ADDRESS TRANSACTION TYPE	CITY	STATE ZIP REPORT TYPE DATE	TYPE OF FILER ELECTION	AMOUNT
HUNT, RICHARD A FRIENDS OF SENATOR DAVID KARNES 88SEN/006/1384 0279372 CONTRIBUTION		BLAIR HUNTEL SYSTEMS	NE 68008 SENATE YEAR-END 7NOV87	PRIMARY AMENDMENT	926
HUNT, RICHARD A FRIENDS OF SENATOR DAVID KARNES 88SEN/019/2546 0605531 CONTRIBUTION		BLAIR HUNTEL SYSTEMS	NE 68008 SENATE OCTOBER QUARTERLY 4NOV88	GENERAL	900
HUNT, RICHARD H PETE DU PONT FOR PRESIDENT 87FEC/476/4153 0095532 CONTRIBUTION		CAMBRIDGE	MA 02138 PRESIDENTIAL OCTOBER QUARTERLY 4NOV87	PRIMARY	1,000
HUNT, RICHARD H UTAH POWER & LIGHT COMPANY POLITICAL ACTION COMMITTEE - FEDERAL 87FEC/481/2733 0129945 CONTRIBUTION REF TO INDIVIDUAL		OGDEN	UT 84404 NON-PARTY QUALIFIED TERMINATION REPORT 30JUL87	PRIMARY	140-
HUNT, RICHARD H MR GEORGE BUSH FOR PRESIDENT, INC 88FEC/505/1007 0183199 CONTRIBUTION		CAMBRIDGE HARVARD UNIV	MA 02138 PRESIDENTIAL YEAR-END 13NOV87	PRIMARY	1,000
HUNT, RICHARD H MR DOLE FOR PRESIDENT COMMITTEE INC 88FEC/490/0564 0193363 CONTRIBUTION		CAMBRIDGE	MA 02138 PRESIDENTIAL YEAR-END 28OCT87	PRIMARY	1,000
HUNT, RICHARD H MR ALBERT GORE JR FOR PRESIDENT COMMITTEE INC 88FEC/506/4066 0211362 CONTRIBUTION		CAMBRIDGE UNIVERSITY TEACHER & ADMINISTRATION	MA 02138 PRESIDENTIAL FEBRUARY MONTHLY 25JAN88	PRIMARY	500
HUNT, ROBERT C HAL DAUB FOR SENATE COMMITTEE 88SEN/004/3427 0252482 CONTRIBUTION		BLAIR GREAT PLAINS COMMUNICATION	NE 68008 SENATE YEAR-END 10NOV87	PRIMARY	1,000
HUNT, ROBERT C FRIENDS OF WHITNEY DURAND		CHATTANOOGA	TN 37412 HOUSE TERMINATION REPORT	PRIMARY	23-

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88HSE/356/4942 0459016 CONTRIBUTION REF TO INDIVIDUAL			30JUN88	
HUNT, ROBERT C NATIONAL SECURITY POLITICAL ACTION COMMITTEE 88FEC/547/4314 0493637 CONTRIBUTION	BLAIR	NE 68008 NON-PARTY QUALIFIED SEPTEMBER MONTHLY 31AUG88	PRIMARY	500
HUNT, ROBERT C NEBRASKA REPUBLICAN FEDERAL CAMPAIGN COMMITTEE 88FEC/554/2514 0528902 CONTRIBUTION	BLAIR	NE 68008 PARTY QUALIFIED OCTOBER QUARTERLY 29JUL88	PRIMARY	1,000
HUNT, ROBERT C MR LAXALT FOR PRESIDENT COMMITTEE 87FEC/475/1306 0042620 CONTRIBUTION	PARADISE VALLEY HUNT CORP	AZ 85253 PRESIDENTIAL JULY QUARTERLY 93UN87	PRIMARY	1,000

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CONTRIBUTOR/LENDER/TRANSFERER REPORTING ENTITY MICROFILM LOCATION TRANSACTION TYPE	STREET ADDRESS	CITY	STATE ZIP TYPE OF FILER REPORT TYPE DATE	ELECTION	AMOUNT
HUNT, ROBERT G COMMITTEE TO RE-ELECT CONGRESSMAN LAGOMARSINO 87HSE/336/3093 0156537 CONTRIBUTION		ENCINO INDUSTRIAL ASPHALT	CA 91436 HOUSE MID-YEAR REPORT 27MAY87	PRIMARY	500
HUNT, ROBERT G CALIFORNIANS FOR PETE WILSON 1994 88SEN/004/2277 0269961 CONTRIBUTION		SCOTTSDALE PRESIDENT	AZ 85253 SENATE YEAR-END 29NOV87	PRIMARY	500
HUNT, ROBERT G COMMITTEE TO RE-ELECT CONGRESSMAN LAGOMARSINO 88HSE/348/4556 0342265 CONTRIBUTION		ENCINO INDUSTRIAL ASPHALT	CA 91436 HOUSE APRIL QUARTERLY 25JAN88	PRIMARY	500
HUNT, ROBERT G COMMITTEE TO RE-ELECT CONGRESSMAN LAGOMARSINO 88HSE/355/0801 0466242 CONTRIBUTION		ENCINO INDUSTRIAL ASPHALT	CA 91436 HOUSE JULY QUARTERLY 20JUN88	GENERAL	500
HUNT, ROBERT J MR GEORGE BUSH FOR PRESIDENT, INC 88FEC/505/0799 0182001 CONTRIBUTION		SEA RANCH LAKES HUNT COOK RIGGS & MEHR	FL 33308 PRESIDENTIAL YEAR-END 19NOV87	PRIMARY	1,000
HUNT, ROBERT L RON PAUL FOR PRESIDENT 87FEC/408/4531 0124635 CONTRIBUTION			VA PRESIDENTIAL OCTOBER QUARTERLY 15SEP87	GENERAL	700
HUNT, RONALD FRIENDS OF JIM MOODY 88HSE/359/0841 0495858 CONTRIBUTION REF TO INDIVIDUAL		MADISON	WI 53718 HOUSE PRE-PRIMARY 26JUL88	PRIMARY	50-
HUNT, RONALD K SCOTT FOR CONGRESS COMMITTEE 88HSE/348/3469 0305641 CONTRIBUTION		MOUTHCARD MOUNTAIN BELTING	KY 41548 HOUSE APRIL QUARTERLY 26FEB88	PRIMARY	750
HUNT, ROY R DEMOCRATIC STATE CENTRAL COMMITTEE OF MARYLAND		SPENCERVILLE	MD 20868 PARTY QUALIFIED YEAR-END	PRIMARY	1,000

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88FEC/307/3033 0244175 CONTRIBUTION			23OCT87		
HUNT, SAM TOM GILMORE FOR CONGRESS 88HSE/344/2252 0262594 CONTRIBUTION	BURLINGTON	NC 27215 HOUSE YEAR-END 31OCT87		PRIMARY	1,000
HUNT, SAM TERRY SANFORD FOR U S SENATE 88SEN/014/2757 0456365 CONTRIBUTION	BURLINGTON HUNT ELECTRIC SUPPLY CO	NC 27215 SENATE MID-YEAR REPORT 49WR88		GENERAL	1,000
HUNT, SAM TERRY SANFORD FOR U S SENATE 88SEN/014/2757 0456366 CONTRIBUTION	BURLINGTON HUNT ELECTRIC SUPPLY CO	NC 27215 SENATE MID-YEAR REPORT 49WR88		SPECIAL	1,000

CONTRIBUTOR/LENDER/TRANSFERER REPORTING ENTITY MICROFILM LOCATION TRANSACTION TYPE	STREET ADDRESS	CITY	STATE ZIP TYPE OF FILER REPORT TYPE DATE	ELECTION	AMOUNT
HUNT, SAM TERRY SANFORD FOR U S SENATE 89SEN/004/0481 0701617 CONTRIBUTION			SENATE MID-YEAR REPORT 49WR88	GENERAL	1,000- AMENDMENT
HUNT, SAM TERRY SANFORD FOR U S SENATE 89SEN/004/0481 0701618 CONTRIBUTION			SENATE MID-YEAR REPORT 49WR88	GENERAL	800 AMENDMENT
HUNT, SAM TERRY SANFORD FOR U S SENATE 89SEN/004/0481 0701619 CONTRIBUTION			SENATE MID-YEAR REPORT 49WR88	SPECIAL	1,000- AMENDMENT
HUNT, SAM TERRY SANFORD FOR U S SENATE 89SEN/004/0481 0701620 CONTRIBUTION			SENATE MID-YEAR REPORT 29OCT86	PRIMARY	800 AMENDMENT
HUNT, SAM H DEMOCRATIC PARTY OF SOUTH CAROLINA 88FEC/524/0452 0330983 CONTRIBUTION	GREENVILLE SOUTHERN BANK	SC 29603 PARTY QUALIFIED APRIL QUARTERLY 22JAN88		PRIMARY	1,000
HUNT, SAM H LIZ PATTERSON FOR CONGRESS 1988 88HSE/348/3395 0339408 CONTRIBUTION	GREENVILLE FIRST TRYON SECURITIES	SC 29603 HOUSE APRIL QUARTERLY 18MAR88		PRIMARY	1,000
HUNT, SAM H LIZ PATTERSON FOR CONGRESS 1988 88HSE/371/2404 0669046 CONTRIBUTION	GREENVILLE FIRST TRYON SECURITIES	SC 29603 HOUSE POST-GENERAL 31OCT88		GENERAL	1,000
HUNT, SAM H MR DMC SERVICES CORPORATION/DEMOCRATIC NATIONAL COMMITTEE 88FEC/530/0205 0362178 CONTRIBUTION	GREENVILLE	SC 29603 PARTY QUALIFIED JUNE MONTHLY 23MAY88		PRIMARY	1,000
HUNT, SAM MR	BURLINGTON	NC 27215 PRESIDENTIAL			

"Albert Gore Jr For President Committee Inc" 88FEC/506/4066 0211363 CONTRIBUTION	HUNT ELECTRIC SUPPLY CO		FEBRUARY MONTHLY 25JAN88	PRIMARY	1,000
HUNT, SAM MR TOM GILMORE FOR CONGRESS 88HSE/363/2983 0542066 CONTRIBUTION	BURLINGTON HUNT ELECTRIC	NC 27215 HOUSE	OCTOBER QUARTERLY 26JUL88	GENERAL	1,000
HUNT, SAMUEL-P MD AMERICANS WITH HART INC 87FEC/425/3203 0000984 CONTRIBUTION REF TO INDIVIDUAL	PROVIDENCE	RI 02906 PRESIDENTIAL	YEAR-END 31MAY84	PRIMARY	100
HUNT, SHELLI DEMOCRATIC SENATORIAL CAMPAIGN COMMITTEE 89SEN/002/0233 0683899 CONTRIBUTION	LAS VEGAS NEVADA TITLE COMPANY	NV 89102 PARTY QUALIFIED	YEAR-END 30DEC88	PRIMARY	500

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INDIVIDUAL CONTRIBUTOR--DATABASE REPORT

CONTRIBUTOR/LENDER/TRANSFERRER REPORTING ENTITY MICROFILM LOCATION TRANSACTION TYPE	STREET ADDRESS	CITY	STATE ZIP TYPE OF FILER REPORT TYPE DATE	ELECTION	AMOUNT
HUNT, SHERWIN NATIONAL SECURITY POLITICAL ACTION COMMITTEE 88FEC/572/2040 0643890 CONTRIBUTION		DALLAS EMPIRE OIL CO	TX 75205 NON-PARTY QUALIFIED POST-GENERAL 27OCT88	PRIMARY	1,000
HUNT, SHAREE AMERICANS WITH HART INC 86FEC/334/3049 0000626 CONTRIBUTION		DENVER HUNT OIL CO	CO 80206 PRESIDENTIAL JULY QUARTERLY 6JUN86	PRIMARY	1,000
HUNT, SHAREE FRIENDS OF GARY HART-1988 INC 87FEC/476/0202 0055878 CONTRIBUTION		DENVER HUNT OIL CO	CO 80206 PRESIDENTIAL JULY QUARTERLY 30MAR87	PRIMARY	1,000
HUNT, SHAREE SCHROEDER FUND FOR THE FUTURE INC 88FEC/506/1232 0207350 CONTRIBUTION		DENVER COMMUNITY ACTIV	CO 80206 INDEPENDENT EXPENDITURE YEAR-END 12AUG87	PRIMARY	1,000
HUNT, SHAREE COLORADANS FOR DAVID SKAGGS 88HSE/342/2647 0237091 CONTRIBUTION		DENVER HUNT OIL COMPANY	CO 80206 HOUSE YEAR-END 31DEC87	PRIMARY	1,060
HUNT, SHAREE COMMITTEE TO REELECT CONGRESSMAN JOHN MILLER 88HSE/356/3443 0477315 CONTRIBUTION		DENVER	CO 80206 HOUSE JULY QUARTERLY 24JUN88	PRIMARY	1,000
HUNT, SHAREE COLORADANS FOR DAVID SKAGGS 88HSE/362/0905 0516540 CONTRIBUTION		DENVER AUTHOR	CO 80206 HOUSE OCTOBER QUARTERLY 15AUG88	GENERAL	1,000
HUNT, SHAREE MS MARTHA EZZARD FOR CONGRESS 88HSE/356/2561 0454352 CONTRIBUTION		DENVER PHILANTHROPIST	CO 80206 HOUSE JULY QUARTERLY 18MAR88	PRIMARY	500
HUNT, SHAREE MS		DENVER	CO 80206 PARTY QUALIFIED		

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DNC SERVICES CORPORATION/DEMOCRATIC NATIONAL COMMITTEE 88FEC/546/3090 0484071 CONTRIBUTION	COLORADO SPRINGS SUNMON	SEPTEMBER MONTHLY 17NU88	PRIMARY	10,000
HUNT, SHANEE MS MARTHA EZZARD FOR CONGRESS 88HSE/363/1715 0526079 CONTRIBUTION	DENVER SELF - PHILANTHROPIST	CO 80206 HOUSE OCTOBER QUARTERLY 8NU88	PRIMARY	500
HUNT, SHANEE MS MARTHA EZZARD FOR CONGRESS 88HSE/363/1715 0526080 CONTRIBUTION	DENVER SELF - PHILANTHROPIST	CO 80206 HOUSE OCTOBER QUARTERLY 12NU88	GENERAL	1,000
HUNT, TIMOTHY A MR ASKEW FOR US SENATE 88SEN/011/3599 0445275 CONTRIBUTION REF TO INDIVIDUAL	TAMPA	FL 33606 SENATE JULY QUARTERLY 17JUN88	PRIMARY	12-

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INDIVIDUAL CONTRIBUTOR--DATABASE REPORT

CONTRIBUTOR/LENDER/TRANSFERRER REPORTING ENTITY MICROFILM LOCATION TRANSACTION TYPE	STREET ADDRESS	CITY	STATE ZIP TYPE OF FILER REPORT TYPE DATE	ELECTION	AMOUNT
HUNT, TORRENCE M PEOPLE FOR JOHN HEINZ COMMITTEE 88SEN/019/3986 0563729 CONTRIBUTION		PITTSBURGH ALCOA	PA 15232 SENATE OCTOBER QUARTERLY 15SEP88	GENERAL	500
HUNT, TORRENCE M SR ALLEGHENY COUNTY REPUBLICAN CAMPAIGN COMMITTEE FEDERAL 88FEC/538/5319 0418317 CONTRIBUTION		PITTSBURGH	PA 15232 PARTY NON-QUALIFIED JULY QUARTERLY 16MAY88	PRIMARY	500
HUNT, VERA F FRIENDS OF PAUL TRIBLE 88SEN/014/0355 0461161 CONTRIBUTION REF TO INDIVIDUAL		CLIFTON FORGE	VA 24422 SENATE MID-YEAR REPORT 22FEB88	PRIMARY	6-
HUNT, VERNON ASSOCIATION OF TRIAL LAWYERS OF AMERICA POLITICAL ACTION COMMITTEE 87FEC/468/1150 0029079 CONTRIBUTION REF TO INDIVIDUAL		SANTA ANA	CA 92701 NON-PARTY QUALIFIED PRE-SPECIAL 11NOV87	PRIMARY	83-
HUNT, VERNON M JR CALIFORNIANS FOR PETE WILSON 1994 88SEN/004/2162 0269389 CONTRIBUTION		SANTA ANA	CA 92701 SENATE YEAR-END 21OCT87	PRIMARY	500
HUNT, VERNON M JR JOHN HYLTON FOR CONGRESS 88HSE/349/1530 0299897 CONTRIBUTION		LAGUNA BEACH HUNT, COLAW & RICE INC	CA 92651 HOUSE APRIL QUARTERLY 29FEB88	PRIMARY	1,000
HUNT, W J HAMPTON ROADS CONGRESSIONAL CLUB AND FRIENDS OF OWEN PICKETT 88HSE/352/3589 0439023 CONTRIBUTION		VA BEACH	VA 23452 HOUSE JULY QUARTERLY 30JUN88	PRIMARY	500
HUNT, W L MR TEXAS REPUBLICAN CONGRESSIONAL COMMITTEE A/K/A VICTORY '88 88FEC/555/4322 0526694 CONTRIBUTION		EL PASO	TX 79904 PARTY QUALIFIED OCTOBER QUARTERLY 15SEP88	PRIMARY	5,000
HUNT, W L MOODY MR		EL PASO	TX 79904 SENATE		

SENATOR LLOYD BENTSEN ELECTION COMMITTEE 88SEN/004/1286 0241096 CONTRIBUTION	HUNT BUILDING CORP	YEAR-END 9NOV87	PRIMARY	1,000
HUNT, WILLIAM A ASSOCIATED GENERAL CONTRACTORS POLITICAL ACTION COMMITTEE 87FEC/485/2623 0125287 CONTRIBUTION	PENSACOLA GULF-ATLANTIC CONSTRUCTORS INC	FL 32503 NON-PARTY QUALIFIED SEPTEMBER MONTHLY 14AUG87	PRIMARY	1,000
HUNT, WILLIAM A ASSOCIATED GENERAL CONTRACTORS POLITICAL ACTION COMMITTEE 88FEC/521/4574 0309910 CONTRIBUTION	PENSACOLA GULF-ATLANTIC CONSTRS INC	FL 32503 NON-PARTY QUALIFIED APRIL MONTHLY 11MAR88	PRIMARY	1,000
HUNT, WILLIAM A FRIENDS OF CONNIE MACK 88SEN/011/2179 0456908 CONTRIBUTION	PENSACOLA GULF-ATLANTIC CORP	FL 32503 SENATE JULY QUARTERLY 20JUN88	PRIMARY	500

CONTRIBUTOR/LENDER/TRANSFERRER REPORTING ENTITY MICROFILM LOCATION TRANSACTION TYPE	STREET ADDRESS	CITY	STATE ZIP TYPE OF FILER REPORT TYPE DATE	ELECTION	AMOUNT
HUNT, WILLIAM A FRIENDS OF CONNIE MACK 88SEN/011/2179 0456909 CONTRIBUTION		PENSACOLA GULF-ATLANTIC CORP	FL 32503 SENATE JULY QUARTERLY 20JUN88	GENERAL	500
HUNT, WILLIAM A FRIENDS OF CONNIE MACK 88SEN/020/2578 0617481 CONTRIBUTION		PENSACOLA GULF-ATLANTIC CORP	FL 32503 SENATE PRE-GENERAL 19OCT88	GENERAL	900
HUNT, WILLIAM H MR GEORGE BUSH FOR PRESIDENT, INC 87FEC/488/2928 0107178 CONTRIBUTION		PORTLAND RETIRED	OR 97205 PRESIDENTIAL OCTOBER QUARTERLY 14JUL87	PRIMARY	500
HUNT, WILLIAM J PETE DAWKINS FOR SENATE 88SEN/021/3671 0585385 CONTRIBUTION		NEWARK DEMARIA ELLIS AND HUN	NJ 07102 SENATE PRE-GENERAL 30CT88	GENERAL	1,000
HUNT, WILLIAM J MR REPUBLICAN NATIONAL COMMITTEE - CONTRIBUTIONS (AKA REPUBLICAN NATIONAL FINANCE COMMITTEE 87FEC/474/2500 0040404 CONTRIBUTION		SPRINGFIELD	IL 62703 PARTY QUALIFIED JULY QUARTERLY 29JUN87	PRIMARY	500
HUNT, WILLIAM J MR REPUBLICAN NATIONAL COMMITTEE - CONTRIBUTIONS (AKA REPUBLICAN NATIONAL FINANCE COMMITTEE 88FEC/534/3907 0402277 CONTRIBUTION		SPRINGFIELD N I I INC	IL 62703 PARTY QUALIFIED JULY QUARTERLY 12MAY88	PRIMARY	500
HUNT, WILLIAM MR DOLE FOR PRESIDENT COMMITTEE INC 88FEC/490/1222 0196013 CONTRIBUTION		NEWARK DEMARIA COUNS AT LAW	NJ 07102 PRESIDENTIAL YEAR-END 10NOV87	PRIMARY	500
HUNT, WILLIAM S III MR ALBERT GORE JR FOR PRESIDENT COMMITTEE INC 87FEC/475/4485 0050209 CONTRIBUTION		NIXON HAGMANN COMPANY	TN 37343 PRESIDENTIAL JULY QUARTERLY 4JUN87	PRIMARY	1,000
HUNT, W		EL PASO	TX 79922 HOUSE		

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COLEMAN FOR CONGRESS
87HSE/335/1329 0155040 CONTRIBUTION

HUNT BLDG CORP — MID-YEAR REPORT — GENERAL — 500
11FEB87

PORTLAND — OR 97205 PARTY QUALIFIED

HUNT, WM H
OREGON REPUBLICAN PARTY
88FEC/354/2205 0532420 CONTRIBUTION

OCTOBER QUARTERLY — PRIMARY — 1,000
25JUL88

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INDIVIDUAL CONTRIBUTOR--DATABASE REPORT

CONTRIBUTOR/LENDER/TRANSFERRER — STREET ADDRESS — CITY — STATE ZIP — TYPE OF FILER — REPORT TYPE — ELECTION — AMOUNT
REPORTING ENTITY
MICROFILM LOCATION — TRANSACTION TYPE — DATE

CONTRIBUTION	256	337,062
EARMARKED CONTRIBUTION	1	800
MEMO(FILER'S % OF CONTRB GIVEN TO JT FR)	2	12,000
LOAN REPAYMENTS MADE TO INDIVIDUAL	3	200
CONTRIBUTION REF TO INDIVIDUAL	23	6,009-
EARMARKED INTERMEDIARY TREASURY OUT	1	800
TOTAL	286	344,853

SEARCH MENU

The following fields may be searched by menu:

1.	NAME	CONTRIBUTOR NAME
2.	PPB	PRINCIPLE PLACE OF BUSINESS
3.	CITY	CITY
4.	STATE	STATE
5.	ZIP	ZIP CODE
6.	RPTTY	REPORT CODE
7.	AI	AMENDMENT INDICATOR
8.	TRNTY	TRANSACTION CODE
9.	ACTDT	TRANSACTION DATE
10.	AMT	TRANSACTION AMOUNT
11.	ID	REPORTING COMMITTEE ID#
12.	OTHID	RECEIVING COMMITTEE ID#
13.	CMTE	REPORTING COMMITTEE NAME

Make up to 13 selections, one at a time, by field name or item number, enter RA to return to the MAIN MENU

Enter field or type GO to execute the search----> 1

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INDIVIDUAL CONTRIBUTOR--DATABASE REPORT

CONTRIBUTOR/LENDER/TRANSFERER / REPORTING ENTITY / MICROFILM LOCATION	STREET ADDRESS / TRANSACTION TYPE	CITY	STATE ZIP / REPORT TYPE / DATE	TYPE OF FILER / ELECTION	AMOUNT
SIMONS, A N MR ALBERT GORE JR FOR PRESIDENT COMMITTEE INC 88FEC/531/5431 0408457 CONTRIBUTION		AUSTIN	TX 78731 PRESIDENTIAL JULY MONTHLY 93JL88	PRIMARY	500
SIMONS, ADELE FRIENDS OF GARY HART-1988 INC 87FEC/476/0379 0059661 CONTRIBUTION		AMHERST	MA 01002 PRESIDENTIAL JULY QUARTERLY 15MAY87	PRIMARY	1,000
SIMONS, ADELE COMMITTEE TO RE-ELECT SENATOR EDWARD M KENNEDY 88SEN/007/2143 0352013 CONTRIBUTION		AMHERST HAMPSHIRE COLLEGE	MA 01002 SENATE APRIL QUARTERLY 14MAR88	PRIMARY	1,000
SIMONS, ADELE DR KIDSPAC 88FEC/509/3786 0216077 CONTRIBUTION		AMHERST HAMPSHIRE COLLEGE	MA 01002 NON-PARTY QUALIFIED FEBRUARY MONTHLY 63MAR88	PRIMARY	1,000
SIMONS, ADELE MS PAUL SIMON FOR PRESIDENT 87FEC/489/2330 0111252 CONTRIBUTION		AMHERST TRUSTEES OF HAMPSHIRE COLLEGE AMKIN 20AUG87	MA 01002 PRESIDENTIAL OCTOBER QUARTERLY	PRIMARY	500
SIMONS, ADELE SMITH DUKAKIS FOR PRESIDENT COMMITTEE, INC 87FEC/470/5161 0059481 CONTRIBUTION		AMHERST HAMPSHIRE COLLEGE	MA 01002 PRESIDENTIAL JULY QUARTERLY 24MAR87	PRIMARY	1,000
SIMONS, ADELE SMITH BROCK ADAMS SENATE COMMITTEE 87SEN/007/0619 0141302 CONTRIBUTION		AMHERST HAMPSHIRE COLLEGE	MA 01002 SENATE MID-YEAR REPORT 17FEB87	PRIMARY	1,000
SIMONS, ADELE SMITH DUKAKIS FOR PRESIDENT COMMITTEE COMPLIANCE FUND 88FEC/531/3043 0393944 CONTRIBUTION		AMHERST HAMPSHIRE COLLEGE	MA 01002 PRESIDENTIAL JULY MONTHLY 16JUN88	GENERAL	1,000

SIMMONS, ADELE SMITH MRS PAUL SIMON FOR PRESIDENT 88FEC/506/0399 0179787 CONTRIBUTION	AMHERST HAMPSHIRE COLLEGE	MA 01002 PRESIDENTIAL YEAR-END 22OCT87	PRIMARY	500
SIMMONS, AMY P PEOPLE FOR JOHN HEINZ COMMITTEE 88SEN/026/2970 0643158 CONTRIBUTION	WASHINGTON	DC 20008 SENATE POST-GENERAL 21OCT88	GENERAL	1,000
SIMMONS, ANDREA DOLE FOR PRESIDENT COMMITTEE INC 87FEC/475/0978 0061854 CONTRIBUTION	DALLAS	TX 75240 PRESIDENTIAL JULY QUARTERLY 20APR87	PRIMARY	1,000
SIMMONS, ANDREA CONTRAN CORPORATION POLITICAL ACTION COMMITTEE (CONPAC) 87FEC/473/4274 0067363 CONTRIBUTION	DALLAS CONTRAN CORPORATION	TX 75240 NON-PARTY QUALIFIED MID-YEAR REPORT 15APR87	PRIMARY	5,000

CONTRIBUTOR/LENDER/TRANSFERRER REPORTING ENTITY MICROFILM LOCATION TRANSACTION TYPE	STREET ADDRESS	CITY	STATE ZIP TYPE OF FILER REPORT TYPE DATE	ELECTION	AMOUNT
SIMMONS, ANDREA WALLOP SENATE DRIVE, INC 87SEN/009/0233 0134636 MEMO(FILER'S % OF CONTRB GIVEN TO JT FR)		DALLAS STUDENT	TX 75240 SENATE MID-YEAR REPORT 23APR87	PRIMARY	1,000
SIMMONS, ANDREA WTW REELECTION COMMITTEE 87SEN/009/0277 0141209 CONTRIBUTION		DALLAS STUDENT	TX 75240 SENATE MID-YEAR REPORT 23APR87	PRIMARY	3,000
SIMMONS, ANDREA HATCH ELECTION COMMITTEE 87SEN/009/1266 0141570 CONTRIBUTION		DALLAS STUDENT	TX 75240 SENATE MID-YEAR REPORT 21APR87	PRIMARY	1,000
SIMMONS, ANDREA HATCH ELECTION COMMITTEE 87SEN/009/1266 0141571 CONTRIBUTION		DALLAS STUDENT	TX 75240 SENATE MID-YEAR REPORT 21APR87	GENERAL	1,000
SIMMONS, ANDREA FRIENDS OF PAUL TRIBLE 87SEN/009/0138 6143500 MEMO(FILER'S % OF CONTRB GIVEN TO JT FR)		DALLAS STUDENT	TX 75240 SENATE MID-YEAR REPORT 4MAY87	PRIMARY	1,000
SIMMONS, ANDREA HECHT REELECTION COMMITTEE 87SEN/006/4148 0146943 CONTRIBUTION		DALLAS SMU	TX 75240 SENATE MID-YEAR REPORT 24APR87	PRIMARY	1,000
SIMMONS, ANDREA HECHT REELECTION COMMITTEE 87SEN/006/4149 0146944 CONTRIBUTION		DALLAS SMU	TX 75240 SENATE MID-YEAR REPORT 24APR87	GENERAL	1,000
SIMMONS, ANDREA HATCH ELECTION COMMITTEE 88SEN/001/3839 0243633 CONTRIBUTION REF TO INDIVIDUAL		DALLAS	TX 75240 SENATE YEAR-END 22OCT87	PRIMARY	1,000-

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SIMMONS, ANDREA LEHIGH VALLEY CITIZENS FOR DON RITTER 88HSE/342/2850 0268491 CONTRIBUTION	DALLAS STUDENT	TX 75240 HOUSE YEAR-END 28JUL87	PRIMARY	1,000	
SIMMONS, ANDREA FRIENDS OF SENATOR DAVID KARNES 88SEN/006/1424 0279745 CONTRIBUTION	DALLAS STUDENT	TX 75240 SENATE YEAR-END 27OCT87	PRIMARY	1,000	AMENDMENT
SIMMONS, ANDREA JEFFORDS-WACK VICTORY COMMITTEE 88SEN/013/0154 0451271 CONTRIBUTION	DALLAS STUDENT	TX 75240 SENATE JULY QUARTERLY 31MAY88	PRIMARY	2,000	
SIMMONS, ANDREA FRIENDS OF CONNIE MACK 88SEN/016/2465 0498933 MEMO(FILER'S % OF CONTRB GIVEN TO JT FR)	DALLAS STUDENT	TX 75240 SENATE PRE-PRIMARY 31MAY88	PRIMARY	1,000	AMENDMENT

CONTRIBUTOR/LENDER/TRANSFERER REPORTING ENTITY MICROFILM LOCATION TRANSACTION TYPE	STREET ADDRESS	CITY	STATE ZIP TYPE OF FILER REPORT TYPE DATE	ELECTION	AMOUNT
SIMMONS, ANDREA PEOPLE FOR JOHN HEINZ COMMITTEE 88SEN/019/3906 0563550 CONTRIBUTION		DALLAS STUDENT	TX 75240 SENATE OCTOBER QUARTERLY 22JUL88	GENERAL	1,000
SIMMONS, ANDREA WILLIAMS CONGRESS '88 88HSE/362/3085 0563550 CONTRIBUTION		DALLAS STUDENT	TX 75240 HOUSE OCTOBER QUARTERLY 12SEP88	GENERAL	1,000
SIMMONS, ANDREA MS FRIENDS OF VOINOVICH 88SEN/008/2931 0306605 CONTRIBUTION		DALLAS STUDENT	TX 75240 SENATE APRIL QUARTERLY 22FEB88	PRIMARY	1,000
SIMMONS, ANDREA MS HAIG FOR PRESIDENT 88FEC/531/0989 0370139 CONTRIBUTION		DALLAS	TX 75240 PRESIDENTIAL JUNE MONTHLY 10MAY88	PRIMARY	1,000
SIMMONS, ANDREA MS CALIFORNIANS FOR PETE WILSON 1994 88SEN/011/1205 0417524 CONTRIBUTION		DALLAS STUDENT	TX 75240 SENATE JULY QUARTERLY 23JUN88	GENERAL	1,000
SIMMONS, ANNETTE DOLE FOR PRESIDENT COMMITTEE INC 87FEC/475/0978 0061856 CONTRIBUTION		DALLAS	TX 75225 PRESIDENTIAL JULY QUARTERLY 17APR87	PRIMARY	1,000
SIMMONS, ANNETTE DOLE FOR PRESIDENT COMMITTEE INC 87FEC/475/1247 0062812 CONTRIBUTION REF TO INDIVIDUAL		DALLAS	TX 75225 PRESIDENTIAL JULY QUARTERLY 30JUN87	PRIMARY	250-
SIMMONS, ANNETTE HECHT REELECTION COMMITTEE 87SEN/006/4148 0146940 CONTRIBUTION		DALLAS HOMEMAKER	TX 75240 SENATE MID-YEAR REPORT 24APR87	PRIMARY	1,000

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SIMMONS, ANNETTE HECHT REELECTION COMMITTEE 87SEN/006/4148 0146942 CONTRIBUTION	DALLAS HOMEMAKER	TX 75240 SENATE MID-YEAR REPORT 24APR87	GENERAL	1,000	
SIMMONS, ANNETTE FRIENDS OF SENATOR DAVID KARNES 88SEN/006/1424 0279744 CONTRIBUTION	DALLAS HOUSEWIFE	TX 75240 SENATE YEAR-END 27OCT87	PRIMARY	1,000	AMENDMENT
SIMMONS, ANNETTE RICK MONTOYA FOR UNITED STATES SENATE COMMITTEE 88SEN/008/2282 0316799 CONTRIBUTION	DALLAS HOUSEWIFE	TX 75240 SENATE APRIL QUARTERLY 7MAY88	PRIMARY	1,000	
SIMMONS, ANNETTE JEFFORDS-MACK VICTORY COMMITTEE 88SEN/013/0154 0451269 CONTRIBUTION	DALLAS CIVIC LEADER	TX 75240 SENATE JULY QUARTERLY 31MAY88	PRIMARY	2,000	

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SIMMONS, ANNETTE FRIENDS OF CONNIE MACK 88SEN/016/2465 0498932 MEMO(FILER'S % OF CONTRB GIVEN TO JT FR)		DALLAS CIVIC LEADER	TX 75240 SENATE PRE-PRIMARY 31MAY88	PRIMARY	1,000 AMENDMENT
SIMMONS, ANNETTE PEOPLE FOR JOHN HEINZ COMMITTEE 88SEN/019/3906 0563351 CONTRIBUTION		DALLAS HOUSEWIFE	TX 75225 SENATE OCTOBER QUARTERLY 22JUL88	GENERAL	1,000
SIMMONS, ANNETTE MRS FRIENDS OF PHIL GRAMM 88SEN/014/2008 0443603 CONTRIBUTION		DALLAS	TX 75234 SENATE MID-YEAR REPORT 23JAN88	GENERAL	1,000
SIMMONS, ANNETTE MRS FRIENDS OF PHIL GRAMM 88SEN/014/2072 0444979 CONTRIBUTION REF TO INDIVIDUAL		DALLAS	TX 75234 SENATE MID-YEAR REPORT 23JAN88	PRIMARY	1,000-
SIMMONS, ANNETTE MS CALIFORNIANS FOR PETE WILSON 1994 88SEN/011/1206 0417527 CONTRIBUTION		DALLAS	TX 75240 SENATE JULY QUARTERLY 7JUN88	GENERAL	1,000
SIMMONS, B WAYNE MR LACEY SMITH FOR CONGRESS 88HSE/341/2768 0256418 CONTRIBUTION		PADUCAH SIMMONS ENGINEERING	KY 42001 HOUSE YEAR-END 16DEC87	PRIMARY	200
SIMMONS, BECKY LYNN NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE CONTRIBUTIONS 87HSE/334/0410 0087633 MEMO(FILER'S % OF CONTRB GIVEN TO JT FR)		AMARILLO INVESTMENTS	TX 79109 PARTY QUALIFIED MID-YEAR REPORT 10MAR87	PRIMARY	1,500
SIMMONS, BECKY LYNN PRESIDENT'S DINNER/AKA 1987 REPUBLICAN SENATE-HOUSE DINNER COMMITTEE 87FEC/480/0868 0090611 CONTRIBUTION		AMARILLO INVESTMENTS-RENTAL PROPERTY	TX 79109 PARTY NON-QUALIFIED MID-YEAR REPORT 10MAR87	PRIMARY	3,000

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SIMMONS, BECKY LYNN MRS NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS * 87SEN/006/0749 0085470 MEMO(FILER'S I OF CONTRB GIVEN TO JT FR) SELF-EMP	AMARILLO	TX 79109 PARTY QUALIFIED MID-YEAR REPORT 10JUL87	PRIMARY	1,500
SIMMONS, BENJAMIN L JR FRIENDS OF SENATOR DAVID KARNES 88SEN/007/2186 0325024 CONTRIBUTION	LINCOLN TOUCHE ROSS	NE 68502 SENATE APRIL QUARTERLY 21APR88	PRIMARY	1,000
SIMMONS, BENJAMIN L JR FRIENDS OF SENATOR DAVID KARNES 88SEN/019/2623 0605761 CONTRIBUTION	LINCOLN TOUCHE ROSS	NE 68502 SENATE OCTOBER QUARTERLY 14SEP88	GENERAL	1,000
SIMMONS, BERNARD ROBB FOR THE SENATE 88SEN/019/1726 0569289 CONTRIBUTION	RICHLANDS SIMMONS RAN & CO CORP	VA 24641 SENATE OCTOBER QUARTERLY 12AUG88	GENERAL	500

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SIMMONS, BRIAN P PEOPLE FOR JOHN HEINZ COMMITTEE 88SEN/026/2970 0643159 CONTRIBUTION		CHICAGO	IL 60657 SENATE POST-GENERAL 21OCT88	GENERAL	1,000
SIMMONS, CHARLES A FRIENDS OF DICK ARMEY 88HSE/343/4370 0266990 CONTRIBUTION		FT WORTH	TX 76101 HOUSE YEAR-END 19OCT87	PRIMARY	1,000
SIMMONS, CHARLES A PEOPLE FOR DIOGUARDI 88HSE/342/2262 0270696 CONTRIBUTION		SCARSDALE ATTORNEY	NY 10583 HOUSE YEAR-END 10JUL87	PRIMARY	1,000
SIMMONS, CHARLES A PEOPLE FOR DIOGUARDI 88HSE/342/2262 0270697 CONTRIBUTION		SCARSDALE ATTORNEY	NY 10583 HOUSE YEAR-END 90EC87	GENERAL	500
SIMMONS, CHARLES M GEORGE BUSH FOR PRESIDENT, INC 87FEC/470/1106 0025660 CONTRIBUTION		FORT WORTH	TX 76101 PRESIDENTIAL APRIL QUARTERLY 30APR87	PRIMARY	1,000
SIMMONS, CHARLES M CONSERVATIVE VICTORY COMMITTEE 88FEC/542/3010 0469427 CONTRIBUTION		FORT WORTH	TX 76101 NON-PARTY QUALIFIED AUGUST MONTHLY 25JUL88	PRIMARY	1,000
SIMMONS, CHARLES M TARRANT COUNTY REPUBLICAN VICTORY FUND 88FEC/564/0032 0555385 CONTRIBUTION		FORT WORTH INVESTOR	TX 76107 PARTY QUALIFIED PRE-GENERAL 17OCT88	PRIMARY	500
SIMMONS, CHARLES R JR GEPHARDT FOR PRESIDENT COMMITTEE INC 87FEC/488/4045 0127340 CONTRIBUTION		FLORISSANT	MO 63034 PRESIDENTIAL OCTOBER QUARTERLY 20OCT87	PRIMARY	530

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SIMMONS, CLIFFORD H MR NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE CONTRIBUTIONS 88HSE/347/0706 0288681 CONTRIBUTION	ANN ARBOR	MI 48108	PARTY QUALIFIED APRIL QUARTERLY 31MAR88	PRIMARY	2,500
SIMMONS, CLIFFORD H MR REPUBLICAN NATIONAL COMMITTEE - CONTRIBUTIONS (AKA REPUBLICAN NATIONAL FINANCE COMMITTEE 88FEC/519/2052 0301159 CONTRIBUTION	SALINE	MI 48176	PARTY QUALIFIED APRIL QUARTERLY 13JAN88	PRIMARY	500
SIMMONS, CLIFFORD H MR NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE CONTRIBUTIONS 88HSE/367/2773 0599249 CONTRIBUTION	ANN ARBOR	MI 48108	PARTY QUALIFIED PRE-GENERAL 19OCT88	PRIMARY	500
SIMMONS, CLIFFORD H MR REPUBLICAN NATIONAL COMMITTEE - CONTRIBUTIONS (AKA REPUBLICAN NATIONAL FINANCE COMMITTEE 89FEC/581/2888 0681585 CONTRIBUTION	ANN ARBOR	MI 48108	PARTY QUALIFIED YEAR-END 29DEC88	PRIMARY	500

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SIMMONS, CRAIG HECHT REELECTION COMMITTEE 88SEN/027/0634 0672358 CONTRIBUTION		WASHINGTON SENATOR CHICHECHT	DC 20007	SENATE YEAR-END 17AUG88	PRIMARY	750- AMENDMENT
SIMMONS, CRAIG E HECHT REELECTION COMMITTEE 88SEN/001/3624 0250751 CONTRIBUTION		WASHINGTON	DC 20007	SENATE YEAR-END 24AUG87	PRIMARY	750
SIMMONS, D R JR GEORGIA REPUBLICANS 89FEC/577/1680 0671119 CONTRIBUTION		BAINBRIDGE ELBERTA CRATE & BOX CO	GA 31717	PARTY QUALIFIED POST-GENERAL 17OCT88	PRIMARY	500
SIMMONS, DANIEL WAYNE OWENS FOR CONGRESS COMMITTEE 88HSE/342/4018 0260178 CONTRIBUTION		CLEARWATER	FL 33519	HOUSE YEAR-END 28DEC87	PRIMARY	1,000
SIMMONS, DANIEL L PETE DAWKINS FOR SENATE 88SEN/004/4366 0246513 CONTRIBUTION		CLEARWATER	FL 33519	SENATE YEAR-END 7DEC87	PRIMARY	1,000
SIMMONS, DANIEL L BOWKER FOR CONGRESS COMMITTEE 88HSE/343/0763 0271487 CONTRIBUTION		CLEARWATER JOHNSON SIMMONS COMPANY	FL 33519	HOUSE YEAR-END 28DEC87	PRIMARY	1,000
SIMMONS, DANIEL L BOWKER FOR CONGRESS COMMITTEE 88HSE/343/0763 0271488 CONTRIBUTION		CLEARWATER JOHNSON SIMMONS COMPANY	FL 33519	HOUSE YEAR-END 28DEC87	GENERAL	1,000
SIMMONS, DANIEL L JOE LIEBERMAN FOR U S SENATE		CLEARWATER	FL 34630	SENATE APRIL QUARTERLY	PRIMARY	1,000

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CONTRIBUTOR/LENDER/TRANSFERRER / REPORTING ENTITY / MICROFILM LOCATION / TRANSACTION TYPE	STREET ADDRESS	CITY	STATE ZIP	TYPE OF FILER / REPORT TYPE / DATE	ELECTION	AMOUNT
SIMMONS, DANIEL L MR COMMITTEE TO RE-ELECT CONGRESSMAN DAN MICA 88HSE/342/0328 0255050 CONTRIBUTION		CLEARWATER JOHNSON AND CO	FL 33519	HOUSE YEAR-END 14OCT87	PRIMARY	750
SIMMONS, DANIEL L MR COMMITTEE TO RE-ELECT CONGRESSMAN DAN MICA 88HSE/342/0328 0255051 CONTRIBUTION		CLEARWATER JOHNSON AND CO	FL 33519	HOUSE YEAR-END 14OCT87	GENERAL	750
SIMMONS, DANIEL L MR BEPHARDT FOR PRESIDENT COMMITTEE INC 88FEC/522/0137 0312856 CONTRIBUTION		CLEARWATER	FL 34630	PRESIDENTIAL APRIL MONTHLY 22MAR88	PRIMARY	2,000
SIMMONS, DANIEL L MR DAN MICA FOR SENATE 88SEN/008/3343 0374934 CONTRIBUTION		CLEARWATER JOHNSON AND CO	FL 33519	SENATE APRIL QUARTERLY 43MAR88	GENERAL	500

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SIMMONS, DANIEL L MR GUNTER FOR U S SENATE COMMITTEE 88SEN/013/1583 0454496 CONTRIBUTION		CLEARWATER THE JOHNSON SIMMONS COMPAN	IL 34616	SENATE JULY QUARTERLY 31MAY88	PRIMARY	1,000
SIMMONS, DANIEL L MR GUNTER FOR U S SENATE COMMITTEE 88SEN/015/0432 0475356 CONTRIBUTION		CLEARWATER THE JOHNSON SIMMONS COMPAN	FL 34616	SENATE PRE-PRIMARY 6AUG88	RUNOFF	1,000
SIMMONS, DANIEL L MR GUNTER FOR U S SENATE COMMITTEE 88SEN/017/0464 0506546 CONTRIBUTION		CLEARWATER THE JOHNSON SIMMONS COMPAN	FL 34624	SENATE OCTOBER QUARTERLY 15SEP88	GENERAL	500
SIMMONS, DANIEL L MR GUNTER FOR U S SENATE COMMITTEE 89SEN/002/1585 0686449 CONTRIBUTION REF TO INDIVIDUAL		CLEARWATER	FL 34264	SENATE YEAR-END 4NOV88	GENERAL	500-
SIMMONS, DARYL BOWKER FOR SENATE 89SEN/003/2877 0699180 CONTRIBUTION REF TO INDIVIDUAL		CLEARWATER	FL 33519	SENATE YEAR-END 31OCT88	PRIMARY	1,000-
SIMMONS, DAVID E WAYNE OWENS FOR CONGRESS COMMITTEE 88HSE/362/5346 0619524 CONTRIBUTION		SALT LAKE CITY SIMMONS FAMILY TRUST	UT 84123	HOUSE OCTOBER QUARTERLY 10SEP88	GENERAL	1,000
SIMMONS, DAVID H FRIENDS OF CONNIE MACK 88SEN/004/0813 0252980 CONTRIBUTION		ORLANDO BRAGE SIMMONS ET AL	FL 32802	SENATE YEAR-END 23DEC87	PRIMARY	1,000
SIMMONS, DAVID H FRIENDS OF CONNIE MACK		ORLANDO	FL 32802	SENATE PRE-GENERAL	GENERAL	500

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88SEN/020/2527 861375 CONTRIBUTION	BRADE SIMONS ET AL		17OCT88		
SIMONS, DAVID H MR BILL MCCOLLUM FOR CONGRESS 88HSE/342/4497 8250722 CONTRIBUTION	ORLANDO ATTORNEY	FL 32802 HOUSE YEAR-END 1NOV87		PRIMARY	500
SIMONS, DAVID I CALIFORNIA REPUBLICAN PARTY/VICTORY '88 88FEC/556/0124 8523429 CONTRIBUTION	HOLLYWOOD	CA 90068 PARTY QUALIFIED OCTOBER QUARTERLY 31AUG88		PRIMARY	500
SIMONS, DAVID M MR WYCHE FOWLER FOR SENATE 88SEN/001/2134 8482209 CONTRIBUTION	BEVERLY HILLS MANAGEMENT CONSULTANT	CA 90210 SENATE YEAR-END 26OCT88		PRIMARY	500
SIMONS, DIANE PEOPLE FOR JOHN HEINZ COMMITTEE 88SEN/019/3906 8563552 CONTRIBUTION	DALLAS HOUSEWIFE	TX 75240 SENATE OCTOBER QUARTERLY 22JUL88		GENERAL	1,000

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SIMONS, DONALD ASSOCIATION OF TRIAL LAWYERS OF AMERICA POLITICAL ACTION COMMITTEE 87FEC/468/1150 8029081 CONTRIBUTION REF TO INDIVIDUAL		WATERBURY	CT 06702 NON-PARTY QUALIFIED PRE-SPECIAL 13MAR87	PRIMARY	40-
SIMONS, DONALD D MR LACEY SMITH FOR CONGRESS 88HSE/341/2765 8256399 CONTRIBUTION		PADUCAH SIMONS ENGINEERING	KY 42086 HOUSE YEAR-END 18DEC87	PRIMARY	500
SIMONS, DONALD E DURENBERGER FOR U S SENATE VOLUNTEER COMMITTEE 88SEN/013/2224 8425524 CONTRIBUTION		IRVING	TX 75016 SENATE JULY QUARTERLY 11APR88	PRIMARY	1,000
SIMONS, DONALD M RANGEL FOR CONGRESS COMMITTEE 87HSE/337/2249 8153710 CONTRIBUTION		MUSKOGEE CONSULTANT	OK 74402 HOUSE MID-YEAR REPORT 5MAY87	PRIMARY	1,000
SIMONS, DONALD M WRIGHT APPRECIATION FUND 88HSE/344/1385 8248007 CONTRIBUTION		MUSKOGEE SIMONS ROYALTY COMPANY	OK 74401 NON-PARTY QUALIFIED YEAR-END 19NOV87	PRIMARY	1,000
SIMONS, DONALD M PRESIDENT'S DINNER/AKA 1988 REPUB SENATE-HOUSE DINNER CMTE 88FEC/534/4545 8399622 CONTRIBUTION		SAYRE	PA 18840 PARTY QUALIFIED JULY QUARTERLY 18MAY88	PRIMARY	1,500
SIMONS, DONALD M NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS * 88SEN/010/4899 8411093 MEMO(FILER'S I OF CONTRB GIVEN TO JT FR)		SAYRE	PA 18840 PARTY QUALIFIED JULY QUARTERLY 18MAY88	PRIMARY	750
SIMONS, DONALD M NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE CONTRIBUTIONS		SAYRE	PA 18840 PARTY QUALIFIED JULY QUARTERLY	PRIMARY	750

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88HSE/353/1905 0428805 MEMO(FILER'S % OF CONTRB GIVEN TO JT FR) 18MAY88

SIMMONS, DONALD M — MUSKOGEE OK 74401 NON-PARTY QUALIFIED
MAJORITY CONGRESS COMMITTEE — APRIL MONTHLY — PRIMARY — 750
88HSE/352/1306 0463185 MEMO(FILER'S % OF CONTRB GIVEN TO JT FR) SIMMONS ROYALTY COMPANY — 19NOV87 — AMENDMENT

SIMMONS, DONALD M MR — MUSKOGEE OK 74401 SENATE
OKLAHOMANS FOR BOREN — MID-YEAR REPORT — PRIMARY — 500
87SEN/007/0949 0139596 CONTRIBUTION PETROLEUM CONSULTANT — 9APR87

SIMMONS, DONALD M MR — MUSKOGEE OK 74401 PRESIDENTIAL
GEORGE BUSH FOR PRESIDENT INC COMPLIANCE — JULY MONTHLY — GENERAL — 1,000
88FEC/539/1313 0401162 CONTRIBUTION SIMMONS ROYALTY CO — 23JUN88

SIMMONS, DONALD M MR — MUSKOGEE OK 74402 PRESIDENTIAL
GEORGE BUSH FOR PRESIDENT INC COMPLIANCE — JULY MONTHLY — GENERAL — 1,000
88FEC/539/1314 0401166 CONTRIBUTION — 23JUN88

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SIMMONS, DOROTHY PEOPLE FOR JOHN HEINZ COMMITTEE 87SEN/008/4211 0139837 CONTRIBUTION		SEWICKLEY HOUSEWIFE	PA 15143	SENATE MID-YEAR REPORT 23JUN87	GENERAL	1,000
SIMMONS, DOROTHY PEOPLE FOR JOHN HEINZ COMMITTEE 88SEN/011/2520 0438298 CONTRIBUTION		SEWICKLEY HOUSEWIFE	PA 15143	SENATE JULY QUARTERLY 26APR88	GENERAL	1,000
SIMMONS, DOROTHY P MRS GEORGE BUSH FOR PRESIDENT, INC 87FEC/488/3043 0111709 CONTRIBUTION		SEWICKLEY	PA 15143	PRESIDENTIAL OCTOBER QUARTERLY 22SEP87	PRIMARY	1,000
SIMMONS, DOUG ALEXANDER CAMPAIGN COMMITTEE (AR/01) 88HSE/344/2484 0260474 CONTRIBUTION		WEST HELENA MERCHANTS & FARMERS BANK	AR 72390	HOUSE YEAR-END 08DEC87	PRIMARY	500
SIMMONS, DOUGLAS JEFFORDS-MACK VICTORY COMMITTEE 88SEN/013/0154 0451267 CONTRIBUTION		DALLAS CONTRAN CORP	TX 75205	SENATE JULY QUARTERLY 31MAY88	PRIMARY	1,000
SIMMONS, DOUGLAS FRIENDS OF CONNIE MACK 88SEN/016/2463 0490925 MEMO(FILER'S % OF CONTRB GIVEN TO JT FR)		DALLAS MANAGER	TX 75205	SENATE PRE-PRIMARY 31MAY88	PRIMARY	500 AMENDMENT
SIMMONS, DOUGLAS CONSERVATIVES ACTING FOR TEXANS POLITICAL ACTION COMMITTEE 88FEC/552/2120 0523661 CONTRIBUTION		DALLAS BROKER INVESTOR	TX 75205	NON-PARTY QUALIFIED OCTOBER QUARTERLY 11AUG88	PRIMARY	1,000
SIMMONS, DOUGLAS M DOLE FOR PRESIDENT COMMITTEE INC		DALLAS	TX 75205	PRESIDENTIAL JULY QUARTERLY	PRIMARY	1,000

87FEC/475/0970 0061858 CONTRIBUTION	CONTRAN CORPORATION		17JUN87	
SIMMONS, DOUGLAS H DOLE FOR PRESIDENT COMMITTEE INC 87FEC/488/0570 0125567 CONTRIBUTION	DALLAS CONTRAN CORPORATION	TX 75205	PRESIDENTIAL OCTOBER QUARTERLY 30SEP87	PRIMARY 750
SIMMONS, DOUGLAS H DOLE FOR PRESIDENT COMMITTEE INC 87FEC/488/1101 0128018 CONTRIBUTION REF TO INDIVIDUAL	DALLAS	TX 75205	PRESIDENTIAL OCTOBER QUARTERLY 30SEP87	PRIMARY 250-
SIMMONS, DOUGLAS H HATCH ELECTION COMMITTEE 87SEN/009/1266 0141572 CONTRIBUTION	DALLAS CONTRAN CORP	TX 75205	SENATE MID-YEAR REPORT 21APR87	PRIMARY 500
SIMMONS, DOUGLAS H DOLE FOR PRESIDENT COMMITTEE INC 88FEC/490/1914 0196851 CONTRIBUTION REF TO INDIVIDUAL	DALLAS	TX 75205	PRESIDENTIAL YEAR-END 31DEC87	PRIMARY 750-

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SIMMONS, DOUGLAS H HECHT REELECTION COMMITTEE 88SEN/001/3623 0250701 CONTRIBUTION		DALLAS	TX 75205 SENATE YEAR-END 30SEP87	PRIMARY	1,000
SIMMONS, DOUGLAS H CONTRAN CORPORATION POLITICAL ACTION COMMITTEE (CONPAC) 88FEC/537/1074 0442928 CONTRIBUTION		DALLAS CONTRAN CORPORATION	TX 75205 NON-PARTY QUALIFIED JULY QUARTERLY 15MAY88	PRIMARY	350
SIMMONS, EDWARD J MR ALBERT GORE JR FOR PRESIDENT COMMITTEE INC 87FEC/487/0467 0099329 CONTRIBUTION		WESTFIELD	NJ 07090 PRESIDENTIAL OCTOBER QUARTERLY 29SEP87	PRIMARY	1,000
SIMMONS, ELLEN C GEORGIA REPUBLICANS 89FEC/577/1680 0671122 CONTRIBUTION		BAINBRIDGE HOUSEWIFE	GA 31717 PARTY QUALIFIED POST-GENERAL 17OCT88	PRIMARY	500
SIMMONS, ERICA S DUKAKIS FOR PRESIDENT COMMITTEE, INC 87FEC/470/5161 0050470 CONTRIBUTION		AMHERST	MA 01002 PRESIDENTIAL JULY QUARTERLY 11JUN87	PRIMARY	1,000
SIMMONS, EUGENE B RE-ELECT NANCY JOHNSON TO CONGRESS COMMITTEE 88HSE/352/2320 0453365 CONTRIBUTION		EAST GRANBY AFS CONSTRUCTION	CT 06026 HOUSE PRE-PRIMARY 73UN88	PRIMARY	500
SIMMONS, EVELYN AMERICANS FOR ROBERTSON INC 88FEC/556/2951 0556259 CONTRIBUTION REF TO INDIVIDUAL		OKLAHOMA CITY	73116 PRESIDENTIAL NOVEMBER MONTHLY 18OCT88	PRIMARY	675-
SIMMONS, F C MR		DAVENTRY	PRESIDENTIAL		

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BUSH FOR PRESIDENT, INC 88FEC/548/5257 0520464 CONTRIBUTION			OCTOBER MONTHLY 25SEP88	GENERAL	1,000
SIMMONS, F W MR GEORGE BUSH FOR PRESIDENT, INC 87FEC/408/2832 0106005 CONTRIBUTION	PORTLAND	OR 97219	PRESIDENTIAL OCTOBER QUARTERLY 14JUL87	PRIMARY	500.
SIMMONS, FORREST FRIENDS OF DENNY SMITH 88HSE/341/3757 0256941 CONTRIBUTION	PORTLAND FIRST FARWEST INSURANC	OR 97219	HOUSE YEAR-END 12AUG87	PRIMARY	500
SIMMONS, FORREST FRIENDS OF DENNY SMITH 88HSE/348/0618 0329336 CONTRIBUTION	PORTLAND FIRST FARWEST INSURANCE	OR 97219	HOUSE APRIL QUARTERLY 16MAR88	PRIMARY	500
SIMMONS, FORREST FRIENDS OF DENNY SMITH 88HSE/348/0618 0329337 CONTRIBUTION	PORTLAND FIRST FARWEST INSURANCE	OR 97219	HOUSE APRIL QUARTERLY 16MAR88	PRIMARY	500

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SIMMONS, FORREST W NATIONAL SECURITY POLITICAL ACTION COMMITTEE 88FEC/559/1273 0551148 CONTRIBUTION		PORTLAND EXECUTIVE	OR 97208	NON-PARTY QUALIFIED OCTOBER MONTHLY 6SEP88	PRIMARY	500
SIMMONS, FORREST W MR BOB SMITH FOR CONGRESS COMMITTEE 88HSE/348/1245 0329310 CONTRIBUTION		PORTLAND FIRST FARWEST INS CO	OR 97204	HOUSE APRIL QUARTERLY 1MAR88	PRIMARY	1,000
SIMMONS, FRANK TEXANS FOR BEAU BOULTER 89SEN/002/2535 0684354 CONTRIBUTION		NORTHANTS UNIVERSAL OILFIELD SERVICES LIMITED		SENATE YEAR-END 7DEC88	GENERAL	1,000
SIMMONS, FRANKLIN C JIM CHAPMAN FOR CONGRESS COMMITTEE 88HSE/372/2920 0668656 CONTRIBUTION		NORTHANTS UNIVERSAL OILFIELD SERVICES LTD		HOUSE POST-GENERAL 17NOV88	GENERAL	1,000
SIMMONS, FREDERICK A INDIANA REPUBLICAN STATE CENTRAL COMMITTEE 88FEC/560/2543 0528750 CONTRIBUTION		INDIANAPOLIS	IN 46220	PARTY QUALIFIED PRE-GENERAL 13OCT88	PRIMARY	1,000
SIMMONS, G ROBB FOR THE SENATE 88SEN/019/1726 0569290 CONTRIBUTION		RICHMOND R E BROKER	VA 23220	SENATE OCTOBER QUARTERLY 16AUG88	GENERAL	1,000
SIMMONS, G R HECHT REELECTION COMMITTEE 88SEN/001/3631 0250801 CONTRIBUTION		DALLAS	TX 75240	SENATE YEAR-END 30SEP87	PRIMARY	1,000
SIMMONS, G R		DALLAS	TX 75240	PRESIDENTIAL		

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DOLE FOR PRESIDENT COMMITTEE INC — BOWLR MUNICIPAL — PRIMARY — 250
88FEC/514/0703 8266083 CONTRIBUTION REF TO INDIVIDUAL — 15FEB88

SIMMONS, G R MRS — DALLAS — TX 75224 PRESIDENTIAL
DOLE FOR PRESIDENT COMMITTEE INC — OCTOBER QUARTERLY — PRIMARY — 750
87FEC/488/0571 8125568 CONTRIBUTION — 30SEP87

SIMMONS, G REUBEN — DALLAS — TX 75240 SENATE
FRIENDS OF SENATOR DAVID KARNES — POST-GENERAL — GENERAL — 500
88SEN/025/1350 8623374 CONTRIBUTION — 25OCT88

SIMMONS, G REUBEN — DALLAS — TX 75240 SENATE
STRINDEN FOR U S SENATE — POST-GENERAL — GENERAL — 500
88SEN/025/3044 8658184 CONTRIBUTION — CONTRAN CORPORATION — 24OCT88

SIMMONS, G REUBEN — DALLAS — TX 75240 SENATE
CONRAD BURNS/U S SENATE — POST-GENERAL — GENERAL — 500
88SEN/025/1487 8672475 CONTRIBUTION — VALHI INC — 24OCT88

CONTRIBUTOR/LENDER/TRANSFERRER / REPORTING ENTITY / MICROFILM LOCATION / TRANSACTION TYPE	STREET ADDRESS	CITY	STATE ZIP / REPORT TYPE / DATE	TYPE OF FILER / ELECTION	AMOUNT
SIMMONS, G REUBEN MR SENATOR LLOYD BENTSEN ELECTION COMMITTEE 87SEN/007/3236 8146374 CONTRIBUTION		DALLAS CONTRAN CORPORATION	TX 75234 SENATE MID-YEAR REPORT 30JAN87	PRIMARY	1,000
SIMMONS, G REUBEN MRS SENATOR LLOYD BENTSEN ELECTION COMMITTEE 87SEN/007/3237 8146379 CONTRIBUTION		DALLAS HOUSEWIFE	TX 75240 SENATE MID-YEAR REPORT 30JAN87	PRIMARY	1,000
SIMMONS, GARY FRIENDS OF JOHN TANNER 88HSE/348/3436 8325432 CONTRIBUTION		MCKENZIE AUTO DEALER	TN 38201 HOUSE APRIL QUARTERLY 7AY88	PRIMARY	1,000
SIMMONS, GARY R MR GEPHARDT FOR PRESIDENT COMMITTEE INC 88FEC/514/0852 8272667 CONTRIBUTION		EIGHTY FOUR	PA 15330 PRESIDENTIAL MARCH MONTHLY 1FEB88	PRIMARY	500
SIMMONS, GENE MR DOLE FOR PRESIDENT COMMITTEE INC 88FEC/517/1867 8293448 CONTRIBUTION		GUNN H K INC	GU 96921 PRESIDENTIAL APRIL MONTHLY 6AN88	PRIMARY	500
SIMMONS, GLENN R DOLE FOR PRESIDENT COMMITTEE INC 87FEC/475/0978 8061859 CONTRIBUTION		DALLAS	TX 75240 PRESIDENTIAL JULY QUARTERLY 17JUN87	PRIMARY	1,000
SIMMONS, GLENN R HATCH ELECTION COMMITTEE 87SEN/009/1267 8141573 CONTRIBUTION		DALLAS CONTRAN CORP	TX 75205 SENATE MID-YEAR REPORT 14APR87	PRIMARY	500
SIMMONS, GLENN R		DALLAS	TX 75205 SENATE		

FRIENDS OF CONNIE MACK 88SEN/016/2463 0498724 MEMO(FILER'S % OF CONTRB GIVEN TO JT FR) KEYSTONE CONS IND		PRE-PRIMARY 25MAY88	PRIMARY	1,000 AMENDMENT
SIMMONS, GLENN R CONSERVATIVES ACTING FOR TEXANS POLITICAL ACTION COMMITTEE 88FEC/552/2121 0123662 CONTRIBUTION	DALLAS CONTRAN CORP	TX 75240 NON-PARTY QUALIFIED OCTOBER QUARTERLY 12AUG88	PRIMARY	1,000
SIMMONS, GLENN R PEOPLE FOR JOHN HEINZ COMMITTEE 88SEN/019/3906 0563553 CONTRIBUTION	DALLAS CONTRAN	TX 75240 SENATE OCTOBER QUARTERLY 22JUL88	GENERAL	1,000
SIMMONS, GLENN R MR STEVE BARTLETT CONGRESSIONAL CAMPAIGN COMMITTEE 88HSE/343/0277 0280174 CONTRIBUTION	DALLAS CONTRAN CORPORATION	TX 75240 HOUSE YEAR-END 26OCT87	PRIMARY	875
SIMMONS, GLENN R MR JEFFORDS-MACK VICTORY COMMITTEE 88SEN/013/0155 0451290 CONTRIBUTION	DALLAS KEYSTONE	TX 75205 SENATE JULY QUARTERLY 25MAY88	PRIMARY	1,000

CONTRIBUTOR/LENDER/TRANSFERRER REPORTING ENTITY MICROFILM LOCATION	STREET ADDRESS TRANSACTION TYPE	CITY	STATE ZIP REPORT TYPE DATE	TYPE OF FILER ELECTION	AMOUNT
SIMMONS, GLENN R MRS JEFFORDS-MACK VICTORY COMMITTEE 88SEN/013/0155 0451292 CONTRIBUTION		DALLAS KEYSTONE	TX 75205 SENATE JULY QUARTERLY 25MAY88	PRIMARY	1,000
SIMMONS, GLENN REUBEN MR FRIENDS OF PHIL GRAMM 88SEN/004/3810 0239156 CONTRIBUTION		DALLAS CONTRAN CORP	TX 75234 SENATE YEAR-END 27OCT87	PRIMARY	1,000
SIMMONS, GLENN W PETE DU PONT FOR PRESIDENT 87FEC/476/4227 0103583 CONTRIBUTION		MARIETTA OIL GAS INVESTMENTS	GA 30060 PRESIDENTIAL OCTOBER QUARTERLY 21SEP87	PRIMARY	500
SIMMONS, GLENORA PORTER GOSS FOR CONGRESS CAMPAIGN 88HSE/358/2283 0478586 CONTRIBUTION		FORT MYERS DALTROFF INVESTMENT CORP	FL 33907 HOUSE PRE-PRIMARY 16AUG88	PRIMARY	1,000
SIMMONS, GWEN DOLE FOR PRESIDENT COMMITTEE INC 87FEC/488/0571 0125569 CONTRIBUTION		CLEARWATER	FL 34630 PRESIDENTIAL OCTOBER QUARTERLY 10JUL87	PRIMARY	1,000
SIMMONS, GWEN JOE LIEBERMAN FOR U S SENATE 88SEN/007/3510 0331877 CONTRIBUTION		CLEARWATER HOUSEWIFE	FL 34630 SENATE APRIL QUARTERLY 31MAR88	PRIMARY	1,000
SIMMONS, GWEN MS DAN RICA FOR SENATE 88SEN/008/3343 0374935 CONTRIBUTION		CLEARWATER JOHNSON AND CO	FL 34630 SENATE APRIL QUARTERLY 43MAR88	PRIMARY	1,000
SIMMONS, GWEN MS		CLEARWATER	FL 34630 SENATE		

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DAN NICA FOR SENATE 88SEN/008/3343 0374939 CONTRIBUTION	JOHNSON AND CO		APRIL QUARTERLY 4JAN88	GENERAL	1,000
SIMMONS, GWEN MS GUNTER FOR U S SENATE COMMITTEE 88SEN/015/0432 0475357 CONTRIBUTION	CLEARWATER ARTIST	FL 34630	SENATE PRE-PRIMARY 6AUG88	PRIMARY	500
SIMMONS, HARDWICK JACK KEMP FOR PRESIDENT 87FEC/488/1168 0104013 CONTRIBUTION	NEW YORK SHEARSON LEHMAN BROTHERS	NY 10128	PRESIDENTIAL OCTOBER QUARTERLY 30SEP87	PRIMARY	500
SIMMONS, HARDWICK PETE DAWKINS FOR SENATE 87SEN/008/2806 0143718 CONTRIBUTION	NEW YORK SHEARSON LEHMAN BROS	NY 10128	SENATE MID-YEAR REPORT 30JUN87	PRIMARY	1,000
SIMMONS, HARDWICK PETE DAWKINS FOR SENATE 87SEN/008/2806 0143719 CONTRIBUTION	NEW YORK SHEARSON LEHMAN BROS	NY 10128	SENATE MID-YEAR REPORT 30JUN87	GENERAL	1,000

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INDIVIDUAL CONTRIBUTOR--DATABASE REPORT

CONTRIBUTOR/LENDER/TRANSFERRER REPORTING ENTITY MICROFILM LOCATION TRANSACTION TYPE	STREET ADDRESS	CITY	STATE ZIP	TYPE OF FILER REPORT TYPE DATE	ELECTION	AMOUNT
SIMMONS, HARDWICK BILL BRADLEY FOR U S SENATE '90 87SEN/008/2698 0162462 CONTRIBUTION		NEW YORK SHEARSON LEHMAN BROTHERS	NY 10128	SENATE MID-YEAR REPORT 10JUN87	PRIMARY	1,000
SIMMONS, HARDWICK/CHALLENGE '88 FRIENDS OF SENATOR DAVID KARNES 88SEN/021/3529 0606047 EARMARKED CONTRIBUTION				SENATE PRE-GENERAL 12OCT88	GENERAL	1,000
SIMMONS, HARDWICK/CHALLENGE '88 WALLOP SENATE DRIVE, INC 88SEN/021/0334 0616578 EARMARKED CONTRIBUTION				SENATE PRE-GENERAL 6OCT88	GENERAL	1,000
SIMMONS, HARDWICK MR DOLE FOR PRESIDENT COMMITTEE INC 88FEC/490/1019 0195221 CONTRIBUTION		NEW YORK SHEARSON LEHMAN & BROTHERS	NY 10128	PRESIDENTIAL YEAR-END 90CT87	PRIMARY	1,000
SIMMONS, HARDWICK MR JACK KEMP FOR PRESIDENT 88FEC/548/0684 0494659 CONTRIBUTION REF TO INDIVIDUAL		NEW YORK	NY 10128	PRESIDENTIAL SEPTEMBER MONTHLY 30AUG88	PRIMARY	150-
SIMMONS, HARDWICK MR REPUBLICAN NATIONAL COMMITTEE - CONTRIBUTIONS (AKA REPUBLICAN NATIONAL FINANCE COMMITTEE 88FEC/552/1579 0514549 CONTRIBUTION		NEW YORK SHEARSON LEHMAN HUTTON	NY 10128	PARTY QUALIFIED OCTOBER QUARTERLY 53UL88	PRIMARY	10,000
SIMMONS, HAROLD NL INDUSTRIES INC POLITICAL ACTION COMMITTEE 87FEC/473/0765 0035446 CONTRIBUTION		DALLAS NL INDUSTRIES INC	TX 75225	NON-PARTY QUALIFIED MID-YEAR REPORT 27APR87	PRIMARY	5,000

SIMMONS, HAROLD — DALLAS — TX 75240 — DEPOSITORY

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PETE DU PONT FOR PRESIDENT 87FEC/475/5165 0051089 CONTRIBUTION	CONTRAN CORPORATION		JULY QUARTERLY 1APR87	PRIMARY 1,000
SIMMONS, HAROLD DOLE FOR PRESIDENT COMMITTEE INC 87FEC/475/0979 0061861 CONTRIBUTION	DALLAS	TX 75225 PRESIDENTIAL	JULY QUARTERLY 17APR87	PRIMARY 1,000
SIMMONS, HAROLD DOLE FOR PRESIDENT COMMITTEE INC 87FEC/475/1248 0062819 CONTRIBUTION REF TO INDIVIDUAL	DALLAS	TX 75225 PRESIDENTIAL	JULY QUARTERLY 30JUN87	PRIMARY 250-
SIMMONS, HAROLD NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE 87FEC/480/0071 0075944 CONTRIBUTION	DALLAS	TX 75234 NON-PARTY QUALIFIED	MID-YEAR REPORT 9FEB87	PRIMARY 5,000
SIMMONS, HAROLD PETE DU PONT FOR PRESIDENT 87FEC/476/4228 0103586 CONTRIBUTION	DALLAS CONTIN CORP	TX 75240 PRESIDENTIAL	OCTOBER QUARTERLY 25SEP87	PRIMARY 1,000

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INDIVIDUAL CONTRIBUTOR--DATABASE REPORT

CONTRIBUTOR/LENDER/TRANSFERRER REPORTING ENTITY MICROFILM LOCATION TRANSACTION TYPE	STREET ADDRESS	CITY	STATE ZIP TYPE OF FILER REPORT TYPE DATE	ELECTION	AMOUNT
SIMMONS, HAROLD SIMPSON SENATE COMMITTEE 1990 87SEN/007/3481 0134548 MEMO(FILER'S I OF CONTRB GIVEN TO JT FR) OIL & GAS		DALLAS	TX 75240 SENATE MID-YEAR REPORT 21MAR87	PRIMARY	1,000
SIMMONS, HAROLD WALLOP SENATE DRIVE, INC 87SEN/009/0233 0134635 MEMO(FILER'S I OF CONTRB GIVEN TO JT FR) CONTRAN CORP		DALLAS	TX 75240 SENATE MID-YEAR REPORT 23APR87	PRIMARY	1,666
SIMMONS, HAROLD SIMPSON THEATRE COMMITTEE 87SEN/007/3457 0135067 CONTRIBUTION		DALLAS EXECUTIVE/OIL & GAS	TX 75240 SENATE MID-YEAR REPORT 21MAR87	PRIMARY	1,000 TERMINATED
SIMMONS, HAROLD FRIENDS OF MATTINGLY 87SEN/008/2279 0139887 CONTRIBUTION		DALLAS	TX 75240 SENATE MID-YEAR REPORT 26MAR87	GENERAL	1,000
SIMMONS, HAROLD MCEWEN '88 87SEN/008/3719 0140238 CONTRIBUTION		DALLAS	TX 75244 HOUSE MID-YEAR REPORT 93UN87	PRIMARY	500
SIMMONS, HAROLD MTN REELECTION COMMITTEE 87SEN/009/0277 0141208 CONTRIBUTION		DALLAS CONTRAN CORP	TX 75240 SENATE MID-YEAR REPORT 23APR87	PRIMARY	5,000
SIMMONS, HAROLD MATCH ELECTION COMMITTEE 87SEN/009/1267 0141574 CONTRIBUTION		DALLAS CONTRAN CORP	TX 75240 SENATE MID-YEAR REPORT 21APR87	PRIMARY	1,000

SIMMONS, HAROLD	DALLAS	TX 75240 SENATE		
HATCH ELECTION COMMITTEE		MID-YEAR REPORT	GENERAL	1,000
87SEN/009/1267 0141575 CONTRIBUTION	CONTRAN CORP	21APR87		
SIMMONS, HAROLD	DALLAS	TX 75240 SENATE		
FRIENDS OF PAUL TRIBLE		MID-YEAR REPORT	PRIMARY	1,000
87SEN/009/0138 0143499 MEMO(FILER'S % OF CONTRB GIVEN TO JT FR)	CONTRAN CORP	4MAY87		
SIMMONS, HAROLD	DALLAS	TX 75240 SENATE		
FRIENDS OF PAUL TRIBLE		MID-YEAR REPORT	GENERAL	666
87SEN/009/0139 0143506 MEMO(FILER'S % OF CONTRB GIVEN TO JT FR)	CONTRAN CORP	4MAY87		
SIMMONS, HAROLD	DALLAS	TX 75240 SENATE		
HECHT REELECTION COMMITTEE		MID-YEAR REPORT	PRIMARY	1,000
87SEN/006/4148 0146939 CONTRIBUTION	CONTRAN CORPORATION	24APR87		
SIMMONS, HAROLD	DALLAS	TX 75240 SENATE		
HECHT REELECTION COMMITTEE		MID-YEAR REPORT	GENERAL	1,000
87SEN/006/4148 0146941 CONTRIBUTION	CONTRAN CORPORATION	24APR87		

CONTRIBUTOR/LENDER/TRANSFERRER REPORTING ENTITY MICROFILM LOCATION TRANSACTION TYPE	STREET ADDRESS	CITY	STATE ZIP TYPE OF FILER REPORT TYPE DATE	ELECTION	AMOUNT
SIMMONS, HAROLD		DALLAS	TX 75240 HOUSE		
FRIENDS OF DICK ARNEY			MID-YEAR REPORT	PRIMARY	1,000
87HSE/337/1809 0152253 CONTRIBUTION		INVESTMENTS	22MAY87		
SIMMONS, HAROLD		DALLAS	TX 75240 HOUSE		
FRIENDS OF DICK ARNEY			MID-YEAR REPORT	GENERAL	1,000
87HSE/337/1813 0152272 CONTRIBUTION		INVESTMENTS	22MAY87		
SIMMONS, HAROLD		DALLAS	TX 75240 HOUSE		
ORTIZ FOR CONGRESS			MID-YEAR REPORT	PRIMARY	500
87HSE/336/4477 0154807 CONTRIBUTION		CONTIN CORP	26MAY87		
SIMMONS, HAROLD		DALLAS	TX 75240 NON-PARTY QUALIFIED		
U S FEDERATION OF SMALL BUSINESSES PAC (SMALL BIZ PAC)			YEAR-END	PRIMARY	5,000
88FEC/501/4953 0181655 CONTRIBUTION		VALHI INC	18NOV87		
SIMMONS, HAROLD		DALLAS	TX 75240 PRESIDENTIAL		
PETE DU PONT FOR PRESIDENT			YEAR-END	PRIMARY	1,000-
88FEC/490/4784 0200141 CONTRIBUTION REF TO INDIVIDUAL			80CT87		
SIMMONS, HAROLD		DALLAS	TX 75240 NON-PARTY NON-QUALIFIED		
DALLAS CITIZENS PAC (FKA DALLAS GOOD CANDIDATE COMMITTEE)			YEAR-END	PRIMARY	5,000
88FEC/503/1679 0216523 CONTRIBUTION		INVESTMENTS	11NOV87		
SIMMONS, HAROLD		DALLAS	TX 75240 SENATE		
FRIENDS OF PAUL TRIBLE			YEAR-END	PRIMARY	833-
88SEN/004/0242 0235413 CONTRIBUTION REF TO INDIVIDUAL			19NOV87		

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SIMMONS, HAROLD HATCH ELECTION COMMITTEE 88SEN/001/3839 8243635 CONTRIBUTION REF TO INDIVIDUAL	DALLAS	TX 75240 SENATE YEAR-END 22OCT87	PRIMARY	1,000-
SIMMONS, HAROLD FRIENDS OF SENATOR DAVID KARNES 88SEN/006/1424 8279746 CONTRIBUTION	DALLAS	TX 75240 SENATE YEAR-END 27OCT87	PRIMARY AMENDMENT	1,000
SIMMONS, HAROLD TEXANS FOR BEAU BOULTER 88SEN/006/3685 8299813 CONTRIBUTION	DALLAS CONTRAN CORPORATION	TX 75240 SENATE APRIL QUARTERLY 28MAR88	RUNOFF	1,000
SIMMONS, HAROLD RICK MONTOYA FOR UNITED STATES SENATE COMMITTEE 88SEN/008/2282 8316801 CONTRIBUTION	DALLAS CONTRAN	TX 75240 SENATE APRIL QUARTERLY 7MAR88	PRIMARY	1,000
SIMMONS, HAROLD CONSERVATIVES ACTING FOR TEXANS POLITICAL ACTION COMMITTEE 88FEC/520/4893 8319511 CONTRIBUTION	DALLAS CONTRAN	TX 75240 NON-PARTY QUALIFIED APRIL QUARTERLY 18FEB88	PRIMARY	5,000

CONTRIBUTOR/LENDER/TRANSFERRER REPORTING ENTITY MICROFILM LOCATION TRANSACTION TYPE	STREET ADDRESS	CITY	STATE ZIP TYPE OF FILER REPORT TYPE DATE	ELECTION	AMOUNT
SIMMONS, HAROLD PETE DAWKINS FOR SENATE 88SEN/008/1526 8320329 CONTRIBUTION		DALLAS	TX 75240 SENATE APRIL QUARTERLY 8FEB88	PRIMARY	1,000
SIMMONS, HAROLD DALLAS CITIZENS PAC (FKA DALLAS GOOD CANDIDATE COMMITTEE) 88FEC/523/0121 8321780 CONTRIBUTION REF TO INDIVIDUAL		DALLAS	TX 75240 NON-PARTY NON-QUALIFIED APRIL QUARTERLY 12FEB88	PRIMARY	4,000-
SIMMONS, HAROLD KIRKLAND & ELLIS PAC (FKA MSS PAC) 88FEC/525/2679 8335234 CONTRIBUTION		DALLAS CONTRAN CORPORATION	TX 75240 NON-PARTY QUALIFIED APRIL QUARTERLY 28MAR88	PRIMARY	5,000
SIMMONS, HAROLD JOHN D DINGELL FOR CONGRESS COMMITTEE 88HSE/347/2009 8338492 CONTRIBUTION		DALLAS VALHI INC	TX 75240 HOUSE APRIL QUARTERLY 29JAN88	PRIMARY	1,000
SIMMONS, HAROLD MARKEY FOR CONGRESS COMMITTEE 88HSE/346/4217 8342798 CONTRIBUTION		DALLAS CONTRAN CORP	TX 75240 HOUSE APRIL QUARTERLY 3FEB88	PRIMARY	1,000
SIMMONS, HAROLD CONSERVATIVE VICTORY COMMITTEE 88FEC/537/4052 8396336 CONTRIBUTION		DALLAS	TX 75240 NON-PARTY QUALIFIED JULY MONTHLY 30JUN88	PRIMARY	5,000
SIMMONS, HAROLD MICHEL FOR CONGRESS COMMITTEE 88HSE/352/5046 8423346 CONTRIBUTION		DALLAS CONTRAN CORPORATION	TX 75240 HOUSE JULY QUARTERLY 29APR88	GENERAL	1,000

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SIMMONS, HAROLD MILLIAMS CONGRESS '88 88HSE/354/2754 0425091 CONTRIBUTION	DALLAS CONTRAN CORP	TX 75240 HOUSE JULY QUARTERLY 30JUN88	GENERAL	500
SIMMONS, HAROLD RE-ELECT SENATOR FRANK MURKOWSKI COMMITTEE 88SEN/014/0776 0447733 CONTRIBUTION	DALLAS CONTRAN CORPORATION	TX 75244 SENATE MID-YEAR REPORT 18APR88	PRIMARY	1,000
SIMMONS, HAROLD JEFFORDS-WACK VICTORY COMMITTEE 88SEN/013/0154 0451268 CONTRIBUTION	DALLAS SELF-EMPLOYED	TX 75240 SENATE JULY QUARTERLY 31MAY88	PRIMARY	2,000
SIMMONS, HAROLD KENT HANCE FOR SENATE COMMITTEE 88SEN/014/1821 0452505 CONTRIBUTION	DALLAS CONTRAN CORPORATION	TX 75240 SENATE YEAR-END 30DEC87	PRIMARY AMENDMENT	1,000
SIMMONS, HAROLD FRIENDS OF DENNY SMITH 88HSE/355/2327 0455707 CONTRIBUTION	DALLAS EXECUTIVE	TX 75234 HOUSE JULY QUARTERLY 31MAY88	GENERAL	1,000

CONTRIBUTOR/LENDER/TRANSFERRER REPORTING ENTITY MICROFILM LOCATION TRANSACTION TYPE	STREET ADDRESS	CITY	STATE ZIP TYPE OF FILER REPORT TYPE DATE	ELECTION	AMOUNT
SIMMONS, HAROLD FRIENDS OF PAUL TRIBLE 88SEN/014/0200 0460224 CONTRIBUTION REF TO INDIVIDUAL		DALLAS	TX 75240 SENATE MID-YEAR REPORT 18FEB88	PRIMARY	166-
SIMMONS, HAROLD MIKE SYNAR FOR CONGRESS COMMITTEE 88HSE/354/5087 0470679 CONTRIBUTION		DALLAS VALHI INC	TX 75240 HOUSE JULY QUARTERLY 28JUN88	PRIMARY	500
SIMMONS, HAROLD FRIENDS OF CONNIE MACK 88SEN/016/2465 0490934 MEMO(FILER'S 1 OF CONTRB GIVEN TO JT FR)		DALLAS INVESTOR	TX 75240 SENATE PRE-PRIMARY 31MAY88	PRIMARY AMENDMENT	1,000
SIMMONS, HAROLD CONSERVATIVES ACTING FOR TEXANS POLITICAL ACTION COMMITTEE 88FEC/352/2121 0523663 CONTRIBUTION		DALLAS CONTRAN CORP	TX 75234 NON-PARTY QUALIFIED OCTOBER QUARTERLY 12AUG88	PRIMARY	5,000
SIMMONS, HAROLD PEOPLE FOR JOHN HEINZ COMMITTEE 88SEN/019/3906 0563554 CONTRIBUTION		DALLAS CONTRAN	TX 75225 SENATE OCTOBER QUARTERLY 22JUL88	GENERAL	1,000
SIMMONS, HAROLD JOHN BRYANT CAMPAIGN COMMITTEE 88HSE/362/3374 0594182 CONTRIBUTION		DALLAS CONTRAN CORP	TX 75240 HOUSE OCTOBER QUARTERLY 30SEP88	GENERAL	1,000
SIMMONS, HAROLD PETE DAWKINS FOR SENATE 89SEN/001/1353 0682357 CONTRIBUTION		DALLAS CONTRAN CORPORATION	TX 75240 SENATE YEAR-END 25DEC88	GENERAL	500

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SIMMONS, HAROLD C CONTRAN CORPORATION POLITICAL ACTION COMMITTEE (COMPAC) 87FEC/473/4274 0067355 CONTRIBUTION	DALLAS CONTRAN CORPORATION	TX 75225 NON-PARTY QUALIFIED MID-YEAR REPORT 15APR87	PRIMARY	5,000
SIMMONS, HAROLD MR CAMPAIGN AMERICA 87FEC/460/5396 0008895 CONTRIBUTION	DALLAS	TX 75234 NON-PARTY QUALIFIED FEBRUARY MONTHLY 29JAN87	PRIMARY	2,000
SIMMONS, HAROLD MR FREE CONGRESS PAC (FORMERLY: CNTE FOR THE SURVIVAL OF A FREE CONGRESS) 87FEC/465/4260 0016445 CONTRIBUTION	DALLAS CONTRAN CORPORATION	TX 75244 NON-PARTY QUALIFIED APRIL MONTHLY 23MAR87	PRIMARY	1,000
SIMMONS, HAROLD MR SENATE DEFENSE AND ECONOMIC POLITICAL ACTION COMMITTEE (FKA SEN JOHN TOWER PAC) 87FEC/482/3170 0116262 CONTRIBUTION	DALLAS CONTRAN CORPORATION	TX 75234 NON-PARTY QUALIFIED MID-YEAR REPORT 30JUN87	PRIMARY	660
SIMMONS, HAROLD MR SENATOR LLOYD BENTSEN ELECTION COMMITTEE 87SEN/007/3236 0146375 CONTRIBUTION	DALLAS CONTRAN CORPORATION	TX 75234 SENATE MID-YEAR REPORT 30JAN87	PRIMARY	1,000

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CONTRIBUTOR/LENDER/TRANSFERRER REPORTING ENTITY MICROFILM LOCATION TRANSACTION TYPE	STREET ADDRESS	CITY	STATE ZIP TYPE OF FILER REPORT TYPE DATE	ELECTION	AMOUNT
SIMMONS, HAROLD MR CONGRESSMAN JOE BARTON COMMITTEE 87HSE/336/3748 0155479 CONTRIBUTION		DALLAS CONTRAN CORP	TX 75234 HOUSE MID-YEAR REPORT 23APR87	PRIMARY	1,000
SIMMONS, HAROLD MR GEORGE BUSH FOR PRESIDENT, INC 88FEC/505/1641 0186893 CONTRIBUTION		DALLAS CONTRAN CORP	TX 75240 PRESIDENTIAL YEAR-END 20OCT87	PRIMARY	500
SIMMONS, HAROLD MR TEXANS FOR BEAU BOULTER 88HSE/340/3495 0260782 CONTRIBUTION		DALLAS CONTRAN CORPORATION	TX 75240 SENATE YEAR-END 10CT87	PRIMARY	1,000
SIMMONS, HAROLD MR ALBERT GORE JR FOR PRESIDENT COMMITTEE INC 88FEC/511/5051 0262394 CONTRIBUTION		DALLAS	TX 75240 PRESIDENTIAL MARCH MONTHLY 16FEB88	PRIMARY	1,000
SIMMONS, HAROLD MR STEVE BARTLETT CONGRESSIONAL CAMPAIGN COMMITTEE 88HSE/345/0790 0263588 CONTRIBUTION		DALLAS CONTRAN CORPORATION	TX 75240 HOUSE PRE-PRIMARY 29JAN88	GENERAL	1,000
SIMMONS, HAROLD MR STEVE BARTLETT CONGRESSIONAL CAMPAIGN COMMITTEE 88HSE/343/0277 0290175 CONTRIBUTION		DALLAS CONTRAN CORPORATION	TX 75225 HOUSE YEAR-END 26OCT87	PRIMARY	875
SIMMONS, HAROLD MR FRIENDS OF DICK LUGAR 88SEN/006/2242 0301416 CONTRIBUTION		DALLAS CONTRAN CORPORATION	TX 75240 SENATE APRIL QUARTERLY 20JAN88	PRIMARY	1,000

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SIMMONS, HAROLD MR FRIENDS OF DICK LUGAR 88SEN/006/2242 0301417 CONTRIBUTION	DALLAS CONTRAN CORPORATION	TX 75240 SENATE APRIL QUARTERLY 20JAN88	GENERAL	1,000
SIMMONS, HAROLD MR FRIENDS OF VOINOVICH 88SEN/008/2931 0306604 CONTRIBUTION	DALLAS CONTRAN CORP	TX 75240 SENATE APRIL QUARTERLY 22FEB88	PRIMARY	1,000
SIMMONS, HAROLD MR NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS * 88SEN/007/0977 0327375 CONTRIBUTION	DALLAS PRESIDENT	TX 75225 PARTY QUALIFIED APRIL QUARTERLY 26JAN88	PRIMARY	2,000
SIMMONS, HAROLD MR DANFORTH FOR SENATE COMMITTEE 88SEN/008/1307 0359517 CONTRIBUTION	DALLAS CONTRAN GROUP	TX 75240 SENATE APRIL QUARTERLY 11FEB88	PRIMARY	500
SIMMONS, HAROLD MR HAIG FOR PRESIDENT 88FEC/531/0989 0370140 CONTRIBUTION	DALLAS	TX 75240 PRESIDENTIAL JUNE MONTHLY 10MAY88	PRIMARY	1,000

CONTRIBUTOR/LENDER/TRANSFERRER REPORTING ENTITY MICROFILM LOCATION TRANSACTION TYPE	STREET ADDRESS	CITY	STATE ZIP TYPE OF FILER REPORT TYPE DATE	ELECTION	AMOUNT
SIMMONS, HAROLD MR GEORGE BUSH FOR PRESIDENT INC COMPLIANCE 88FEC/539/1277 0401004 CONTRIBUTION		DALLAS CONTRAN CORP	TX 75240 PRESIDENTIAL JULY MONTHLY 22JUN88	GENERAL	500
SIMMONS, HAROLD MR CALIFORNIANS FOR PETE WILSON 1994 88SEN/011/1205 0417525 CONTRIBUTION		DALLAS BUS EXECUTIVE	TX 75240 SENATE JULY QUARTERLY 30JUN88	GENERAL	1,000
SIMMONS, HAROLD MR FRIENDS OF PHIL GRAMM 88SEN/014/2008 0443604 CONTRIBUTION		DALLAS INVESTMENTS	TX 75234 SENATE MID-YEAR REPORT 23JAN88	GENERAL	1,000
SIMMONS, HAROLD MR FRIENDS OF PHIL GRAMM 88SEN/014/2072 0444980 CONTRIBUTION REF TO INDIVIDUAL		DALLAS	TX 75234 SENATE MID-YEAR REPORT 23JAN88	PRIMARY	1,000-
SIMMONS, HAROLD MR FRIENDS OF PHIL GRAMM 88SEN/014/2072 0444981 CONTRIBUTION REF TO INDIVIDUAL		DALLAS	TX 75234 SENATE MID-YEAR REPORT 2FEB88	PRIMARY	1,000-
SIMMONS, HAROLD MR FRIENDS FOR SLADE GORTON 1988 88SEN/016/0102 0485258 CONTRIBUTION		DALLAS CONTRAN CORP	TX 75240 SENATE PRE-PRIMARY 18JUL88	PRIMARY	1,000
SIMMONS, HAROLD MR CONGRESSMAN JOE BARTON COMMITTEE 88HSE/362/0704 0614249 CONTRIBUTION		DALLAS CONTRAN CORP	TX 75240 HOUSE OCTOBER QUARTERLY 13JUL88	GENERAL	1,000

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SIMMONS, HAROLD MRS SENATOR LLOYD BENTSEN ELECTION COMMITTEE 87SEN/007/3237 0146380 CONTRIBUTION	DALLAS HOUSEWIFE	TX 75240 SENATE MID-YEAR REPORT 30JUN87	PRIMARY	1,000
SIMMONS, HAROLD MRS CONGRESSMAN JOE BARTON COMMITTEE 88HSE/343/3253 0267767 CONTRIBUTION	DALLAS HOUSEWIFE	TX 75234 HOUSE YEAR-END 29SEP87	PRIMARY	1,000
SIMMONS, HAROLD MRS SENATOR LLOYD BENTSEN ELECTION COMMITTEE 88SEN/011/2842 0420260 CONTRIBUTION	DALLAS HOUSEWIFE	TX 75240 SENATE JULY QUARTERLY 28JUL88	GENERAL	1,000
SIMMONS, HARVEY D III WALSH FOR CONGRESS COMMITTEE 88HSE/359/0679 0501268 CONTRIBUTION	SKANEATELES CRUCIBLE MATERIALS COR	NY 13152 HOUSE PRE-PRIMARY 25AUG88	PRIMARY	500
SIMMONS, HERBERT J NEW YORK STATE DEMOCRATIC COMMITTEE-FEDERAL ACCOUNT 88FEC/541/4046 0474188 CONTRIBUTION	FRESH MEADOW KASNER ASSOC	NY 11361 PARTY QUALIFIED JULY QUARTERLY 5WAY88	PRIMARY	500

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CONTRIBUTOR/LENDER/TRANSFERRER REPORTING ENTITY MICROFILM LOCATION	STREET ADDRESS TRANSACTION TYPE	CITY	STATE ZIP REPORT TYPE DATE	TYPE OF FILER ELECTION	AMOUNT
SIMMONS, HOWELL B FRIENDS OF PAUL TRIBLE 88SEN/014/0464 0461817 CONTRIBUTION REF TO INDIVIDUAL		RESTON	VA 22001 SENATE MID-YEAR REPORT 24FEB88	PRIMARY	270-
SIMMONS, IAN T DUKAKIS FOR PRESIDENT COMMITTEE, INC 87FEC/470/5161 0058479 CONTRIBUTION		AMHERST	MA 01002 PRESIDENTIAL JULY QUARTERLY 11JUN87	PRIMARY	1,000
SIMMONS, J J III HONORABLE GEORGE BUSH FOR PRESIDENT, INC 87FEC/475/2108 0047831 CONTRIBUTION		WASHINGTON INTERSTATE COMMERCE COMMISSION	DC 20015 PRESIDENTIAL JULY QUARTERLY 10JUN87	PRIMARY	1,000
SIMMONS, J R MIKE ESPY FOR CONGRESS 88HSE/341/2334 0270441 CONTRIBUTION		YAZOO CITY FISH FARMER	MS 39194 HOUSE YEAR-END 23NOV87	PRIMARY	500
SIMMONS, JAMES B COMMODITY FUTURES POLITICAL FUND OF THE CHICAGO MERCANTILE EXCHANGE 88FEC/503/2065 0201044 CONTRIBUTION		CHICAGO CME	IL 60607 NON-PARTY QUALIFIED YEAR-END 23NOV87	PRIMARY	500
SIMMONS, JAMES B COMMODITY FUTURES POLITICAL FUND OF THE CHICAGO MERCANTILE EXCHANGE 88FEC/572/1688 0637761 CONTRIBUTION		CHICAGO CME	IL 60607 NON-PARTY QUALIFIED POST-GENERAL 21NOV88	PRIMARY	500
SIMMONS, JAMES GERALD DUKAKIS FOR PRESIDENT COMMITTEE, INC 87FEC/470/5161 0058480 CONTRIBUTION		NEW YORK	NY 10176 PRESIDENTIAL JULY QUARTERLY 11JUN87	PRIMARY	1,000

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SIMMONS, JAMES P DECONCINI '88 COMMITTEE 87SEN/006/2332 0148766 CONTRIBUTION	PHOENIX UNITED BANK OF ARIZONA	AZ 85062 SENATE MID-YEAR REPORT 25JUN87	PRIMARY	1,000
SIMMONS, JAMES P RHODES FOR CONGRESS COMMITTEE 88HSE/342/4146 0229992 CONTRIBUTION	PHOENIX UNITED BANK	AZ 85018 HOUSE YEAR-END 30DEC87	PRIMARY	500
SIMMONS, JAMES P CALIFORNIANS FOR PETE WILSON 1994 88SEN/004/2101 0269090 CONTRIBUTION	WASHINGTON	DC 20003 SENATE YEAR-END 70EC87	PRIMARY	500
SIMMONS, JAMES P MR GEORGE BUSH FOR PRESIDENT, INC 87FEC/475/2594 0053109 CONTRIBUTION	PHOENIX UNITED BANK OF ARIZONA	AZ 85012 PRESIDENTIAL JULY QUARTERLY 33JUN87	PRIMARY	900
SIMMONS, JAMES P MR REPUBLICAN STATE COMMITTEE OF ARIZONA 88FEC/556/4150 0528786 CONTRIBUTION	PHOENIX UNITED BANK OF AZ	AZ 85001 PARTY QUALIFIED OCTOBER QUARTERLY 21SEP88	PRIMARY	1,000

CONTRIBUTOR/LENDER/TRANSFERRER REPORTING ENTITY MICROFILM LOCATION TRANSACTION TYPE	STREET ADDRESS	CITY	STATE ZIP TYPE OF FILER REPORT TYPE DATE	ELECTION	AMOUNT
SIMMONS, JAY MRS PETE DU PONT FOR PRESIDENT 87FEC/425/3001 0008283 CONTRIBUTION		DALLAS	TX 75209 PRESIDENTIAL YEAR-END 29DEC86	PRIMARY	750
SIMMONS, JIM ARKLA, INC PAC OR ARKLAPAC 89FEC/579/3755 0678122 CONTRIBUTION		SHREVEPORT ARKLA INC	LA 71106 NON-PARTY QUALIFIED YEAR-END 30DEC88	PRIMARY	500
SIMMONS, JOHN FRIENDS OF GARY HART-1988 INC 87FEC/476/0379 0059666 CONTRIBUTION		AMHERST PARTICIPATION ASSOCIATES	MA 01002 PRESIDENTIAL JULY QUARTERLY 2FEB87	PRIMARY	1,000
SIMMONS, JOHN NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE CONTRIBUTIONS 87HSE/334/0409 0087621 MEMO(FILER'S I OF CONTRB GIVEN TO JT FR)		POMONA	CA 91767 PARTY QUALIFIED MID-YEAR REPORT 23APR87	PRIMARY	2,250
SIMMONS, JOHN NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE CONTRIBUTIONS 87HSE/334/0410 0087635 MEMO(FILER'S I OF CONTRB GIVEN TO JT FR)		POMONA	CA 91767 PARTY QUALIFIED MID-YEAR REPORT 23APR87	PRIMARY	2,250
SIMMONS, JOHN PRESIDENT'S DINNER/AKA 1987 REPUBLICAN SENATE-HOUSE DINNER COMMITTEE 87FEC/480/0868 0090612 CONTRIBUTION		POMONA	CA 91767 PARTY NON-QUALIFIED MID-YEAR REPORT 23APR87	PRIMARY	4,500
SIMMONS, JOHN PRESIDENT'S DINNER/AKA 1987 REPUBLICAN SENATE-HOUSE DINNER COMMITTEE 87FEC/480/0930 0091965 CONTRIBUTION REF TO INDIVIDUAL		POMONA	CA 91767 PARTY NON-QUALIFIED MID-YEAR REPORT 1MAY87	PRIMARY	4,500-

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SIMMONS, JOHN DUKAKIS FOR PRESIDENT COMMITTEE, INC 87FEC/476/4964 0100839 CONTRIBUTION	AMHERST	MA 01002	PRESIDENTIAL OCTOBER QUARTERLY 20SEP87	PRIMARY	1,000
SIMMONS, JOHN BROCK ADAMS SENATE COMMITTEE 87SEN/007/0619 0141303 CONTRIBUTION	AMHERST PARTICIPATION ASSOCIATES	MA 01002	SENATE MID-YEAR REPORT 17FEB87	PRIMARY	1,000
SIMMONS, JOHN DUKAKIS FOR PRESIDENT COMMITTEE COMPLIANCE FUND 88FEC/331/3843 0393943 CONTRIBUTION	AMHERST	MA 01002	PRESIDENTIAL JULY MONTHLY 16JUL88	GENERAL	1,000
SIMMONS, JOHN COMMITTEE FOR TIN NORTH INC 89SEN/002/3277 0687405 CONTRIBUTION	AMHERST	MA 01002	SENATE YEAR-END 95EP89	PRIMARY	1,000
SIMMONS, JOHN COMMITTEE FOR TIN NORTH INC 89SEN/002/3277 0687406 CONTRIBUTION	AMHERST	MA 01002	SENATE YEAR-END 95EP89	PRIMARY	1,000

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CONTRIBUTOR/LENDER/TRANSFERRER REPORTING ENTITY MICROFILM LOCATION TRANSACTION TYPE	STREET ADDRESS	CITY	STATE ZIP	TYPE OF FILER REPORT TYPE DATE	ELECTION	AMOUNT
SIMMONS, JOHN F MR NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS # 89SEN/001/4077 0690338 CONTRIBUTION		OLD REDFORD	MI 48219	PARTY QUALIFIED YEAR-END 19DEC89	PRIMARY	1,000
SIMMONS, JOHN KEVIN DUKAKIS FOR PRESIDENT COMMITTEE COMPLIANCE FUND 88FEC/544/4390 0486019 CONTRIBUTION		AMHERST	MA 01002	PRESIDENTIAL SEPTEMBER MONTHLY 17AUG88	GENERAL	1,000-
SIMMONS, JOHN M GEORGIA REPUBLICANS 89FEC/577/1680 0671127 CONTRIBUTION		BAINBRIDGE ELBERTA CRATE & BOX CO	GA 31717	PARTY QUALIFIED POST-GENERAL 17OCT89	PRIMARY	500
SIMMONS, JOHN MR NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS # 87SEN/006/0748 0085471 MEMO(FILER'S I OF CONTRB GIVEN TO JT FR)		POMONA	CA 91767	PARTY QUALIFIED MID-YEAR REPORT 23APR87	PRIMARY	2,250
SIMMONS, JOHN MR NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS # 87SEN/006/0749 0085479 MEMO(FILER'S I OF CONTRB GIVEN TO JT FR)		POMONA	CA 91767	PARTY QUALIFIED MID-YEAR REPORT 23APR87	PRIMARY	2,250
SIMMONS, JOHN MR JESSE JACKSON FOR PRESIDENT '88 COMMITTEE 88FEC/514/3959 0276959 CONTRIBUTION		AMHERST	MA 01002	PRESIDENTIAL FEBRUARY MONTHLY 13JAN88	PRIMARY AMENDMENT	1,000
SIMMONS, JOHN MR COMMITTEE TO RE-ELECT SENATOR EDWARD M KENNEDY 88SEN/007/2143 0352014 CONTRIBUTION		AMHERST PARTICIPATION ASSOC	MA 01002	SENATE APRIL QUARTERLY 29FEB88	PRIMARY	1,000

SIMMONS, JOHN MR INC SERVICES CORPORATION/DEMOCRATIC NATIONAL COMMITTEE 88FEC/546/3371 0484704 CONTRIBUTION	AMHERST CONSALTONO	MA 01002 PARTY QUALIFIED SEPTEMBER MONTHLY 29AUG88	PRIMARY	1,000
SIMMONS, JOHN MR COMMITTEE TO RE-ELECT SENATOR EDWARD M KENNEDY 88SEN/015/3229 0485477 CONTRIBUTION	AMHERST PARTICIPATION ASSOC	MA 01002 SENATE PRE-PRIMARY 29AUG88	GENERAL	1,000
SIMMONS, JOHN W MR NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS * 88SEN/002/2043 0231678 CONTRIBUTION	FLINTRIDGE	CA 91011 PARTY QUALIFIED YEAR-END 28SEP87	PRIMARY	1,000
SIMMONS, JOHN W MR NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS * 88SEN/010/4529 0410470 CONTRIBUTION	FLINTRIDGE	CA 91011 PARTY QUALIFIED JULY QUARTERLY 6APR88	PRIMARY	1,000
SIMMONS, KAREN R DUKAKIS FOR PRESIDENT COMMITTEE, INC 87FEC/476/4964 0100841 CONTRIBUTION	WEST NEWBURY	MA 01985 PRESIDENTIAL OCTOBER QUARTERLY 29AUG87	PRIMARY	1,000

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SIMMONS, KEITH D FRIENDS OF PAUL TRIBLE 88SEN/004/0263 0235539 CONTRIBUTION REF TO INDIVIDUAL		FAIRFAX	VA 2426 SENATE YEAR-END 24NOV87	PRIMARY	12-
SIMMONS, KEITH D FRIENDS OF PAUL TRIBLE 88SEN/014/0221 0460347 CONTRIBUTION REF TO INDIVIDUAL		FAIRFAX	VA 2426 SENATE MID-YEAR REPORT 18FEB88	PRIMARY	2-
SIMMONS, KEVIN D DUKAKIS FOR PRESIDENT COMMITTEE, INC 87FEC/470/5161 0058482 CONTRIBUTION		AMHERST	MA 01002 PRESIDENTIAL JULY QUARTERLY 11JUN87	PRIMARY	1,000
SIMMONS, KEVIN D DUKAKIS FOR PRESIDENT COMMITTEE COMPLIANCE FUND 88FEC/544/4371 0486004 CONTRIBUTION		AMHERST	MA 01002 PRESIDENTIAL SEPTEMBER MONTHLY 1AUG88	GENERAL	1,000
SIMMONS, L E MR GEORGE BUSH FOR PRESIDENT, INC 87FEC/475/2340 0049996 CONTRIBUTION		HOUSTON SIMMONS AND COMPANY INTERNATION	TX 77002 PRESIDENTIAL JULY QUARTERLY 8MAY87	PRIMARY	1,000
SIMMONS, LAWRENCE D MASSACHUSETTS DEMOCRATIC STATE CMTE - FED FUNDS ACCT 88FEC/570/1410 0637900 MEMO(FILER'S % OF CONTRB GIVEN TO JT FR) POWELL AND GOLDSTEIN		WASHINGTON	DC 20015 PARTY QUALIFIED POST-GENERAL 21OCT88	PRIMARY	595
SIMMONS, LAWRENCE D KENTUCKY STATE DEMOCRATIC CENTRAL EXECUTIVE COMMITTEE		WASHINGTON	DC 20015 PARTY QUALIFIED POST-GENERAL	PRIMARY	595

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SIMMONS, LAWRENCE B — WASHINGTON — DC 20015 PARTY QUALIFIED
DNC SERVICES CORPORATION/DEMOCRATIC NATIONAL COMMITTEE — POST-GENERAL — PRIMARY — 5,000
88FEC/569/397 [redacted] CONTRIBUTION — 21OCT88

SIMMONS, LISA — DALLAS — TX 75225 PRESIDENTIAL
DOLE FOR PRESIDENT COMMITTEE INC — JULY QUARTERLY — PRIMARY — 1,000
87FEC/475/0979 0061863 CONTRIBUTION — 20APR87

SIMMONS, LISA — DALLAS — TX 75240 SENATE
WALLOP SENATE DRIVE, INC — MID-YEAR REPORT — PRIMARY — 1,000
87SEN/009/0233 0134637 MEMO(FILER'S % OF CONTRB GIVEN TO JT FR) CONTRAN CORP — 23APR87

SIMMONS, LISA — DALLAS — TX 75240 SENATE
WTW REELECTION COMMITTEE — MID-YEAR REPORT — PRIMARY — 3,000
87SEN/009/0277 0141210 CONTRIBUTION — CONTRAN CORP — 23APR87

SIMMONS, LISA — DALLAS — TX 75240 SENATE
HATCH ELECTION COMMITTEE — MID-YEAR REPORT — PRIMARY — 1,000
87SEN/009/1267 0141576 CONTRIBUTION — CONTRAN CORP — 21APR87

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SIMMONS, LISA HATCH ELECTION COMMITTEE 87SEN/009/1267 0141577 CONTRIBUTION		DALLAS CONTRAN CORP	TX 75240 SENATE MID-YEAR REPORT 21APR87	GENERAL	1,000
SIMMONS, LISA FRIENDS OF PAUL TRIBLE 87SEN/009/0138 0143501 MEMO(FILER'S % OF CONTRB GIVEN TO JT FR)		DALLAS CONTRAN CORP	TX 75240 SENATE MID-YEAR REPORT 4MAY87	PRIMARY	1,000
SIMMONS, LISA HECHT REELECTION COMMITTEE 87SEN/006/4149 0146945 CONTRIBUTION		DALLAS CONTRAN CORPORATION	TX 75240 SENATE MID-YEAR REPORT 24APR87	PRIMARY	1,000
SIMMONS, LISA HECHT REELECTION COMMITTEE 87SEN/006/4149 0146946 CONTRIBUTION		DALLAS CONTRAN CORPORATION	TX 75240 SENATE MID-YEAR REPORT 24APR87	GENERAL	1,000
SIMMONS, LISA KIRKLAND & ELLIS PAC (FKA MBS PAC) 88FEC/500/2815 0198889 CONTRIBUTION		DALLAS	TX 75240 NON-PARTY QUALIFIED YEAR-END 21OCT87	PRIMARY	5,000
SIMMONS, LISA HATCH ELECTION COMMITTEE 88SEN/001/3839 0243634 CONTRIBUTION REF TO INDIVIDUAL		DALLAS	TX 75240 SENATE YEAR-END 22OCT87	PRIMARY	1,000-
SIMMONS, LISA FRIENDS OF SENATOR DAVID KARNES		DALLAS	TX 75240 SENATE YEAR-END	PRIMARY	1,000

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SIMMONS, LISA — DALLAS — TX 75240 SENATE
JEFFORDS-WACK VI[redacted] COMMITTEE — SELF-E[redacted] — JULY QUARTERLY — PRIMARY — 2,000
88SEN/013/0154[redacted] CONTRIBUTION — 31MAY88

SIMMONS, LISA — DALLAS — TX 75240 SENATE
FRIENDS OF CONNIE MACK — DIRECTOR — PRE-PRIMARY — PRIMARY — 1,000
88SEN/016/2465 0490935 MEMO(FILER'S % OF CONTRB GIVEN TO JT FR) — 31MAY88 — AMENDMENT

SIMMONS, LISA — DALLAS — TX 75240 SENATE
PEOPLE FOR JOHN HEINZ COMMITTEE — STUDENT — OCTOBER QUARTERLY — GENERAL — 1,000
88SEN/019/3906 0563555 CONTRIBUTION — 22JUL88

SIMMONS, LISA — DALLAS — TX 75240 HOUSE
WILLIAMS CONGRESS '88 — CONTRAN — OCTOBER QUARTERLY — GENERAL — 1,000
88HSE/362/3084 0583557 CONTRIBUTION — 12SEP88

SIMMONS, LISA K — DALLAS — TX 75209 NON-PARTY QUALIFIED
CONTRAN CORPORATION POLITICAL ACTION COMMITTEE (CONPAC) — CONTRAN CORPORATION — MID-YEAR REPORT — PRIMARY — 5,000
87FEC/473/4274 0067357 CONTRIBUTION — 15APR87

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SIMMONS, LISA MISS FRIENDS OF PHIL GRAMM 88SEN/004/3796 0239100 CONTRIBUTION		DALLAS	TX 75240	SENATE YEAR-END 30OCT87	GENERAL	1,000
SIMMONS, LISA MISS FRIENDS OF PHIL GRAMM 88SEN/004/3825 0239216 CONTRIBUTION		DALLAS	TX 75240	SENATE YEAR-END 30OCT87	PRIMARY	1,000
SIMMONS, LISA MS CONGRESSMAN JOE BARTON COMMITTEE 88HSE/343/3254 0267769 CONTRIBUTION		DALLAS CONTRAN CORPORATION	TX 75240	HOUSE YEAR-END 14OCT87	PRIMARY	1,000
SIMMONS, LISA MS FRIENDS OF VOINOVICH 88SEN/008/2932 0306606 CONTRIBUTION		DALLAS CONTRAN CORP	TX 75240	SENATE APRIL QUARTERLY 22FEB88	PRIMARY	1,000
SIMMONS, LISA MS CALIFORNIANS FOR PETE WILSON 1994 88SEN/011/1205 0417526 CONTRIBUTION		DALLAS DIRECTOR	TX 75240	SENATE JULY QUARTERLY 7JUN88	GENERAL	1,000
SIMMONS, LORETTA NATIONAL UTILITY CONTRACTORS ASSN LEGISLATIVE INFORMATION & ACTION COMMITTEE 87FEC/477/2115 0065852 CONTRIBUTION		ROCHESTER BLAIR SUPPLY	NY 14624	NON-PARTY QUALIFIED MID-YEAR REPORT 26FEB87	PRIMARY	550
SIMMONS, LORETTA NATIONAL UTILITY CONTRACTORS ASSN LEGISLATIVE INFORMATION & ACTION COMMITTEE		ROCHESTER	NY 14624	NON-PARTY QUALIFIED MID-YEAR REPORT	PRIMARY	1,000

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CONTRIBUTOR/LENDER/TRANSFERRER REPORTING ENTITY MICROFILM LOCATION TRANSACTION TYPE	STREET ADDRESS	CITY	STATE ZIP TYPE OF FILER REPORT TYPE DATE	ELECTION	AMOUNT
SIMMONS, LORRETT[illegible] NATIONAL UTILITY [illegible]RS ASSN LEGISLATIVE INFORMATION & ACTION COMMIT[illegible] 88FEC/534/5340 [illegible] CONTRIBUTION		ROC[illegible] BLAIR S[illegible]	NY 14624 NON-PARTY QUALIFIED JULY QUARTERLY 28APR88	PRIMARY	1,000
SIMMONS, LUCILE JOE LIEBERMAN FOR U S SENATE 88SEN/019/2264 0561262 CONTRIBUTION		MILLDALE	CT 06467 SENATE OCTOBER QUARTERLY 17AUG88	GENERAL	1,000
SIMMONS, LUCILE MS MEICKER '88 COMMITTEE 88SEN/025/0034 0622996 CONTRIBUTION		MILLDALE	CT 06467 SENATE POST-GENERAL 27OCT88	GENERAL	1,000
SIMMONS, MADELYN P MRS ALBERT GORE JR FOR PRESIDENT COMMITTEE INC 87FEC/487/0468 0099330 CONTRIBUTION		WESTFIELD	NJ 07090 PRESIDENTIAL OCTOBER QUARTERLY 29SEP87	PRIMARY	1,000
SIMMONS, MAMIE LENORA B FULANI'S COMMITTEE FOR FAIR ELECTIONS 88FEC/539/5460 0473721 CONTRIBUTION REF TO INDIVIDUAL		BRONX	NY 10463 PRESIDENTIAL AUGUST MONTHLY 29JUL88	PRIMARY	50-
SIMMONS, MARILYN G JOE LIEBERMAN FOR U S SENATE 88SEN/019/2264 0561261 CONTRIBUTION		BRISTOL MARKETING CONSULTANT	CT 06010 SENATE OCTOBER QUARTERLY 17AUG88	GENERAL	1,000
SIMMONS, MARILYN G MS MEICKER '88 COMMITTEE 88SEN/025/0035 0623005 CONTRIBUTION		BRISTOL MARKETING CONSULTANT	CT 06010 SENATE POST-GENERAL 27OCT88	GENERAL	1,000
SIMMONS, MARK JOHN PAUL HAMMERSCHMIDT RE-ELECTION COMMITTEE 88HSE/341/0884 0240660 CONTRIBUTION		SILOAM SPRINGS SIMMONS INDUSTRIES	AR 72761 HOUSE YEAR-END 28DEC87	PRIMARY	1,000
SIMMONS, MARK MEL HANCOCK FOR CONGRESS 88HSE/368/3611 0623867 CONTRIBUTION		SILOAM SPRINGS POULTRY PROD	AR 72761 HOUSE PRE-GENERAL 70CT88	GENERAL	500
SIMMONS, MARK MR SENATOR LLOYD BENTSEN ELECTION COMMITTEE 87SEN/007/3236 0146376 CONTRIBUTION		SILOAM SPRINGS SIMMONS INDUSTRIES	AR 72761 SENATE MID-YEAR REPORT 20MAY87	PRIMARY	1,000
SIMMONS, MARK MR DOLE FOR PRESIDENT COMMITTEE INC 88FEC/490/1019 0195222 CONTRIBUTION		SILOAM SPRINGS	AR 72761 PRESIDENTIAL YEAR-END 70EC87	PRIMARY	1,000
SIMMONS, MARTIN E MR TENNESSEE REPUBLICAN PARTY FEDERAL ELECTION ACCOUNT VICTORY '88		NASHVILLE	TN 37219 PARTY QUALIFIED POST-GENERAL	PRIMARY	500

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CONTRIBUTOR/LENDER/TRANSFERRER REPORTING ENTITY MICROFILM LOCATION	STREET ADDRESS TRANSACTION TYPE	CITY	STATE ZIP REPORT TYPE DATE	TYPE OF FILER ELECTION	AMOUNT
SIMMONS, MARY ALICE PRICE FOR CONGRESS COMMITTEE 88HSE/366/2270 0655294 CONTRIBUTION		RALEIGH	NC 27604 PRE-GENERAL 17OCT88	HOUSE GENERAL	1,000
SIMMONS, MARY ANNE DUKAKIS FOR PRESIDENT COMMITTEE, INC 87FEC/476/4964 0100040 CONTRIBUTION		TAMPA	FL 33606 OCTOBER QUARTERLY 10NOV87	PRESIDENTIAL PRIMARY	750
SIMMONS, MATTHEW R GEORGE BUSH FOR PRESIDENT, INC 87FEC/475/1869 9038651 CONTRIBUTION		HOUSTON SIMMONS AND COMPANY INTERNATION	TX 77002 JULY QUARTERLY 8MAY87	PRESIDENTIAL PRIMARY	1,000
SIMMONS, MATTHEW R BILL BRADLEY FOR U S SENATE '90 88SEN/003/2930 0240402 CONTRIBUTION		HOUSTON SIMMONS & COMPANY	TX 77098 YEAR-END 23NOV87	SENATE PRIMARY	1,000
SIMMONS, MATTHEW R FUND FOR AMERICA'S FUTURE, INC; THE 88FEC/523/2013 0305442 CONTRIBUTION		HOUSTON SIMMONS & COMPANY	TX 77002 APRIL MONTHLY 1MAR88	NON-PARTY QUALIFIED PRIMARY	5,000
SIMMONS, MICHAEL RIEGLE FOR SENATE IN '88 COMMITTEE 87SEN/007/2176 0163647 CONTRIBUTION		BOSTON FIDELITY INVESTMENTS	MA 02109 MID-YEAR REPORT 24JUN87	SENATE PRIMARY	1,000
SIMMONS, MICHAEL BANKAMERICA FEDERAL ELECTION FUND 88FEC/545/1230 0480009 CONTRIBUTION		CANTON BANK OF AMERICA	MA 02021 SEPTEMBER MONTHLY 17AUG88	NON-PARTY QUALIFIED PRIMARY	1,000
SIMMONS, MICHAEL MR DOLE FOR PRESIDENT COMMITTEE INC 88FEC/490/1019 0195223 CONTRIBUTION		BOSTON	MA 02109 YEAR-END 14DEC87	PRESIDENTIAL PRIMARY	500
SIMMONS, MICHAEL R CITIZENS FOR COLEMAN 87HSE/334/1048 0151209 CONTRIBUTION		OVERLAND PARK KANSAS CITY BOARD OF TRADE	KS 66212 MID-YEAR REPORT 15JUN87	HOUSE PRIMARY	500
SIMMONS, PATRICIA E MRS GEORGE BUSH FOR PRESIDENT, INC 87FEC/475/2061 0047126 CONTRIBUTION		PHOENIX	AZ 85108 JULY QUARTERLY 1JUN87	PRESIDENTIAL PRIMARY	1,000
SIMMONS, PAUL DEMOCRATIC PARTY OF NEW MEXICO 88FEC/553/3260 0505700 CONTRIBUTION		SANTA FE	NM 87501 OCTOBER QUARTERLY 22SEP88	PARTY QUALIFIED PRIMARY	1,000
SIMMONS, PERRY JR DR [illegible]		NEWARK	NJ 07108 [illegible]	PRESIDENTIAL PRIMARY	510

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CONTRIBUTOR/LENDER/TRANSFERRER / REPORTING ENTITY / MICROFILM LOCATION / TRANSACTION TYPE	STREET ADDRESS	CITY	STATE ZIP	TYPE OF FILER / REPORT TYPE / DATE	ELECTION	AMOUNT
88FEC/612/1397 0703501 CONTRIBUTION				14JUN88		AMENDMENT
SIMMONS, R P MR GEORGE BUSH FOR PRESID[illegible]C 88FEC/514/1753 0264575 CONTRIBUTION		BENICKLE[illegible]	PA 15143	PRESIDENTIAL MAY[illegible] MONTHLY 10FEB88	PRIMARY	500
SIMMONS, R P MR DANFORTH FOR SENATE COMMITTEE 88SEN/008/1321 0359991 CONTRIBUTION		BENICKLEY ALLEGHENY LUDLUM STEEL CORP	PA 15143	SENATE APRIL QUARTERLY 14MAR88	PRIMARY	500
SIMMONS, R R CASS BALLENGER FOR CONGRESS COMMITTEE 88HSE/354/4874 0423548 CONTRIBUTION		HKY HICKORY SPRINGS	28601	HOUSE JULY QUARTERLY 6MAY88	GENERAL	500
SIMMONS, R R MR NATIONAL SECURITY POLITICAL ACTION COMMITTEE 88FEC/543/3554 0477347 CONTRIBUTION		HICKORY	NC 28601	NON-PARTY QUALIFIED AUGUST MONTHLY 22JUL88	PRIMARY	1,000
SIMMONS, RAYMOND F JR CHRISTOPHER COX FOR CONGRESS 88HSE/356/2455 0429856 CONTRIBUTION		IRVINE INTL RESOURCE GROUP	CA 92715	HOUSE JULY QUARTERLY 23JUN88	GENERAL	1,000
SIMMONS, RHONDA REPUBLICAN PARTY OF FLORIDA FEDERAL CAMPAIGN COMMITTEE (FKA - FLORIDA VICTORY FUND) 88FEC/574/2322 0640841 CONTRIBUTION		WINTER PARK	FL 32789	PARTY QUALIFIED POST-GENERAL 10NOV88	PRIMARY	500
SIMMONS, RICHARD E COMMITTEE TO ELECT HARRY A JOHNSTON II TO CONGRESS 88HSE/346/4275 0338144 CONTRIBUTION		BOCA RATON FINANCIAL CONSULTANT	FL 33431	HOUSE APRIL QUARTERLY 28MAR88	PRIMARY	1,000
SIMMONS, RICHARD L MR CALIFORNIANS FOR PETE WILSON 1994 88SEN/018/2480 0592535 CONTRIBUTION		CARMEL SHAMROCK SEED CO	CA 93923	SENATE OCTOBER QUARTERLY 8AUG88	GENERAL	1,000
SIMMONS, RICHARD P ARLEN SPECTER FOR U S SENATE COMMITTEE 87SEN/008/3808 0139922 CONTRIBUTION		PITTSBURGH ALLEGHNY STEEL	PA 15222	SENATE MID-YEAR REPORT 13APR87	GENERAL	500
SIMMONS, RICHARD P PETE DAWKINS FOR SENATE 88SEN/011/4710 0426744 CONTRIBUTION		PITTSBURGH ALLEGHENY LUDLUM CORP	PA 15222	SENATE JULY QUARTERLY 27MAY88	PRIMARY	500
SIMMONS, RICHARD P PEOPLE FOR JOHN HEINZ COMMITTEE 88SEN/011/2520 0438299 CONTRIBUTION		PITTSBURGH ALLEGHENY LUDLUM STEEL	PA 15143	SENATE JULY QUARTERLY 26APR88	GENERAL	1,000
SIMMONS, RICHARD P PETE DAWKINS FOR SENATE		PITTSBURGH	PA 15222	SENATE [illegible] QUARTERLY	GENERAL	500

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CONTRIBUTOR/LENDER/TRANSFERRER REPORTING ENTITY MICROFILM LOCATION	STREET ADDRESS TRANSACTION TYPE	CITY	STATE ZIP REPORT TYPE DATE	TYPE OF FILER ELECTION	AMOUNT
SIMMONS, RICHARD P NATIONAL SECURITY POLITICAL ACTION COMMITTEE 88FEC/539/0976 #550645 CONTRIBUTION		SEWICKLEY CHAIRMAN	PA 15143 OCTOBER MONTHLY 29SEP88	NON-PARTY QUALIFIED PRIMARY	1,000
SIMMONS, RICHARD P MR PETE DU PONT FOR PRESIDENT 88FEC/490/4994 #198700 CONTRIBUTION		SEWICKLEY ALLEGHENY LUDLOW CORP	PA 15143 YEAR-END 29OCT87	PRESIDENTIAL PRIMARY	750
SIMMONS, RICHARD P MR SENATOR LLOYD BENTSEN ELECTION COMMITTEE 88SEN/011/2842 #420259 CONTRIBUTION		SEWICKLEY ALLEGHENY LUDLUM COR	PA 15143 JULY QUARTERLY 30JUN88	SENATE GENERAL	500
SIMMONS, RICHARD S PETE DU PONT FOR PRESIDENT 87FEC/475/5165 #051091 CONTRIBUTION		NEW YORK CHEMICAL BANK	NY 10172 JULY QUARTERLY 21APR87	PRESIDENTIAL PRIMARY	1,000
SIMMONS, RICHARD S MARKEY FOR CONGRESS COMMITTEE 88HSE/346/4217 #342799 CONTRIBUTION		NEW YORK	NY 10015 APRIL QUARTERLY 3FEB88	HOUSE PRIMARY	1,000
SIMMONS, RICHARD S MR SENATOR LLOYD BENTSEN ELECTION COMMITTEE 87SEN/007/3236 #146377 CONTRIBUTION		NEW YORK CHEMICAL BANK	NY 10172 MID-YEAR REPORT 21MAY87	SENATE PRIMARY	1,000
SIMMONS, RICHARD S MR SENATOR LLOYD BENTSEN ELECTION COMMITTEE 87SEN/007/3236 #146378 CONTRIBUTION		NEW YORK CHEMICAL BANK	NY 10172 MID-YEAR REPORT 21MAY87	SENATE GENERAL	1,000
SIMMONS, RICHARD S MR REPUBLICAN NATIONAL COMMITTEE - CONTRIBUTIONS (AKA REPUBLICAN NATIONAL FINANCE COMMITTEE 88FEC/534/4111 #403047 CONTRIBUTION		NEW YORK CHEMICAL BANK	NY 10172 JULY QUARTERLY 24JUN88	PARTY QUALIFIED PRIMARY	1,000
SIMMONS, ROBERT NATIONAL FEDERATION OF FEDERAL EMPLOYEES PUBLIC AFFAIRS COUNCIL 87FEC/480/4406 #100959 CONTRIBUTION		NEWARK US GOVT - VETERANS ADMINISTRATION	NJ 07108 JULY QUARTERLY 26JUN87	NON-PARTY QUALIFIED PRIMARY	500
SIMMONS, ROBERT WHEAT FOR CONGRESS COMMITTEE 88HSE/356/4723 #468555 CONTRIBUTION		PHILADELPHIA	PA 19130 JULY QUARTERLY 24SEP85	HOUSE PRIMARY	1,000
SIMMONS, ROBERT L FRIENDS OF PAUL TRIBLE 88SEN/004/0227 #235323 CONTRIBUTION REF TO INDIVIDUAL		GREAT FALLS	VA 22066 YEAR-END 18NOV87	SENATE PRIMARY	25-
SIMMONS, ROBERT L		GREAT FALLS	VA 22066	SENATE	-

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	88SEN/014/0185 [illegible] CONTRIBUTION REF TO INDIVIDUAL		MID-YEAR REPORT 18FEB88	PRIMARY	5-
SIMMONS, ROBERT L BUILD POLITICAL ACTION COMMITTEE OF THE NATIONAL ASSOCIATION OF HOME BUILDERS	88FEC/567/4971 0626914 CONTRIBUTION	GREAT FALL[illegible] SIMMONS CONSTR CO	VA 22066 NON-PARTY QUALIFIED POST-GENERAL 24OCT88	PRIMARY	1,000
SIMMONS, ROBYN WAYNE OWENS FOR CONGRESS COMMITTEE	88HSE/362/5342 0619514 CONTRIBUTION	KAYSVILLE HOME MAKER	UT 84037 HOUSE OCTOBER QUARTERLY 10SEP88	GENERAL	1,000
SIMMONS, ROGER D MR ASKEW FOR US SENATE	88SEN/011/3602 0445814 CONTRIBUTION REF TO INDIVIDUAL	HAVANA	FL 32333 SENATE JULY QUARTERLY 17JUN88	PRIMARY	8-
SIMMONS, ROGER M MR NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS *	88SEN/002/2943 0231679 CONTRIBUTION	AMARILLO REG REPRESENTATIVE	TX 79109 PARTY QUALIFIED YEAR-END 29SEP87	PRIMARY	2,000
SIMMONS, RONALD MR REPUBLICAN NATIONAL COMMITTEE - CONTRIBUTIONS (AKA REPUBLICAN NATIONAL FINANCE COMMITTEE	87FEC/474/2607 0040840 CONTRIBUTION	MELLSBORO GTE	PA 16901 PARTY QUALIFIED JULY QUARTERLY 30APR87	PRIMARY	1,000

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INDIVIDUAL CONTRIBUTOR--DATABASE REPORT

CONTRIBUTOR/LENDER/TRANSFERRER REPORTING ENTITY MICROFILM LOCATION TRANSACTION TYPE	STREET ADDRESS	CITY	STATE ZIP TYPE OF FILER REPORT TYPE DATE	ELECTION	AMOUNT
SIMMONS, RONALD MR REPUBLICAN NATIONAL COMMITTEE - CONTRIBUTIONS (AKA REPUBLICAN NATIONAL FINANCE COMMITTEE		MELLSBORO GTE	PA 16901 PARTY QUALIFIED JULY QUARTERLY 11MAY88	PRIMARY	1,200
SIMMONS, ROY M HATCH ELECTION COMMITTEE	88SEN/001/3786 0237962 CONTRIBUTION	KAYSVILLE ZIONS BANCORP	UT 84037 SENATE YEAR-END 21OCT87	PRIMARY	1,000
SIMMONS, ROY M HECHT REELECTION COMMITTEE	88SEN/007/1996 0334600 CONTRIBUTION	KAYSVILLE ZION FIRST NATL BANK	SENATE APRIL QUARTERLY 10MAY88	GENERAL	1,000
SIMMONS, ROY M HATCH ELECTION COMMITTEE	88SEN/010/1903 0441495 CONTRIBUTION	KAYSVILLE ZIONS BANCORP	UT 84037 SENATE JULY QUARTERLY 33JUN88	GENERAL	1,000
SIMMONS, SAMUEL J MR JESSE JACKSON FOR PRESIDENT '88 COMMITTEE	89FEC/612/0847 0703267 CONTRIBUTION	WASHINGTON	DC 20005 PRESIDENTIAL JUNE MONTHLY 14MAY88	PRIMARY AMENDMENT	900
SIMMONS, SAMUEL L DOLE FOR PRESIDENT COMMITTEE INC	87FEC/488/0571 0125570 CONTRIBUTION	NEW YORK ITT CORPORATION	NY 10021 PRESIDENTIAL OCTOBER QUARTERLY 31AUG87	PRIMARY	1,000
SIMMONS, SAMUEL L		NEW YORK	NY 10021 SENATE		

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TERRY SANFORD FOR U S SENATE — YEAR-END — GENERAL — 1,000
88SEN/093/2968 0227472 CONTRIBUTION — ITT CORP — 15SEP87

SIMMONS, SAMUEL L — NEW YORK — NY 10021 PARTY QUALIFIED
VICTORY '88 COMMITTEE — OCTOBER QUARTERLY — PRIMARY — 1,000
88FEC/554/0776 0530762 CONTRIBUTION — ITT — 26SEP88

SIMMONS, SAMUEL L — NEW YORK — NY 10021 SENATE
PETE DAWKINS FOR SENATE — OCTOBER QUARTERLY — GENERAL — 1,000
88SEN/018/3894 0534140 CONTRIBUTION — ITT CORP — 27JUL88

SIMMONS, SCHERYLE — DALLAS — TX 75240 PRESIDENTIAL
DOLE FOR PRESIDENT COMMITTEE INC — JULY QUARTERLY — PRIMARY — 1,000
87FEC/475/0979 0061864 CONTRIBUTION — 20APR87

SIMMONS, SCHERYLE — TUSCON — AZ 85716 NON-PARTY QUALIFIED
CONTRAN CORPORATION POLITICAL ACTION COMMITTEE (CONPAC) — MID-YEAR REPORT — PRIMARY — 5,000
87FEC/473/4274 0067359 CONTRIBUTION — CONTRAN CORPORATION — 15APR87

SIMMONS, SCHERYLE — DALLAS — TX 75240 PRESIDENTIAL
JOHN GLENN PRESIDENTIAL COMMITTEE INC — OCTOBER QUARTERLY — PRIMARY — 500
87FEC/487/0036 0122768 CONTRIBUTION — STUDENT — 24JUL87

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INDIVIDUAL CONTRIBUTOR--DATABASE REPORT

CONTRIBUTOR/LENDER/TRANSFERRER / REPORTING ENTITY / MICROFILM LOCATION / TRANSACTION TYPE	STREET ADDRESS	CITY	STATE ZIP / REPORT TYPE / DATE	TYPE OF FILER / ELECTION	AMOUNT
SIMMONS, SCHERYLE HATCH ELECTION COMMITTEE 87SEN/009/1267 0141578 CONTRIBUTION		DALLAS HOUSEWIFE	TX 75240 MID-YEAR REPORT 21APR87	SENATE PRIMARY	1,000
SIMMONS, SCHERYLE HATCH ELECTION COMMITTEE 87SEN/009/1267 0141579 CONTRIBUTION		DALLAS HOUSEWIFE	TX 75240 MID-YEAR REPORT 21APR87	SENATE GENERAL	1,000
SIMMONS, SCHERYLE LEHIGH VALLEY CITIZENS FOR DON RITTER 88HSE/342/2850 0268492 CONTRIBUTION		DALLAS HOUSEWIFE	TX 75240 YEAR-END 28JUL87	HOUSE PRIMARY	1,000
SIMMONS, SCHERYLE JEFFORDS-NACK VICTORY COMMITTEE 88SEN/013/0154 0451274 CONTRIBUTION		DALLAS HOUSEWIFE	TX 75240 JULY QUARTERLY 31MAY88	SENATE PRIMARY	2,000
SIMMONS, SCHERYLE FRIENDS OF CONNIE MACK 88SEN/016/2465 0498937 MEMO(FILER'S 1 OF CONTRB GIVEN TO JT FR)		DALLAS HOUSEWIFE	TX 75240 PRE-PRIMARY 31MAY88	SENATE PRIMARY	1,000 AMENDMENT
SIMMONS, SCHERYLE PEOPLE FOR JOHN HEINZ COMMITTEE 88SEN/019/3907 0563556 CONTRIBUTION		DALLAS STUDENT	TX 75240 OCTOBER QUARTERLY 22JUL88	SENATE GENERAL	1,000
SIMMONS, SCHERYLE		DALLAS	TX 75240 HOUSE		

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WILLIAMS CONGRESS '88			OCTOBER QUARTERLY	GENERAL	1,000
88HSE/362/3085 [illegible] CONTRIBUTION	HOMEMAKER		12SEP88		
SIMMONS, SCHERYLE J	DALLAS	TX 75240	SENATE		
FRIENDS OF PAUL TRIBLE			MID-YEAR REPORT	PRIMARY	1,000
87SEN/009/0138 0143902 MEMO(FILER'S % OF CONTRB GIVEN TO JT FR)	HOUSEWIFE		4MAY87		
SIMMONS, SCHERYLE JANN	DALLAS	TX 75240	SENATE		
WALLOP SENATE DRIVE, INC			MID-YEAR REPORT	PRIMARY	1,000
87SEN/009/0233 0134638 MEMO(FILER'S % OF CONTRB GIVEN TO JT FR)	HOUSEWIFE		23APR87		
SIMMONS, SCHERYLE JANN	DALLAS	TX 75240	SENATE		
WTW REELECTION COMMITTEE			MID-YEAR REPORT	PRIMARY	3,000
87SEN/009/0277 0141211 CONTRIBUTION	HOUSEWIFE		23APR87		
SIMMONS, SCHERYLE JANN	DALLAS	TX 75240	SENATE		
HECHT REELECTION COMMITTEE			MID-YEAR REPORT	PRIMARY	1,000
87SEN/006/4149 0146947 CONTRIBUTION	HOMEMAKER		24APR87		
SIMMONS, SCHERYLE JANN	DALLAS	TX 75240	SENATE		
HECHT REELECTION COMMITTEE			MID-YEAR REPORT	GENERAL	1,000
87SEN/006/4149 0146948 CONTRIBUTION	HOMEMAKER		24APR87		

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INDIVIDUAL CONTRIBUTOR--DATABASE REPORT

CONTRIBUTOR/LENDER/TRANSFERRER REPORTING ENTITY MICROFILM LOCATION TRANSACTION TYPE	STREET ADDRESS	CITY	STATE ZIP TYPE OF FILER REPORT TYPE DATE	ELECTION	AMOUNT
SIMMONS, SCHERYLE JANN		DALLAS	TX 75240 NON-PARTY QUALIFIED		
KIRKLAND & ELLIS PAC (FKA MSS PAC)			YEAR-END	PRIMARY	5,000
88FEC/500/2815 0196890 CONTRIBUTION			21OCT87		
SIMMONS, SCHERYLE JANN		DALLAS	TX 75240 SENATE		
FRIENDS OF SENATOR DAVID KARNES			YEAR-END	PRIMARY	1,000
88SEN/006/1424 0279749 CONTRIBUTION		HOUSEWIFE	27OCT87	AMENDMENT	
SIMMONS, SCHERYLE MS		DALLAS	TX 75240 SENATE		
FRIENDS OF VOINOVICH			APRIL QUARTERLY	PRIMARY	1,000
88SEN/008/2932 0306607 CONTRIBUTION		HOUSEWIFE	22FEB88		
SIMMONS, SCHERYLE MS		DALLAS	TX 75240 PRESIDENTIAL		
HAIG FOR PRESIDENT			JUNE MONTHLY	PRIMARY	1,000
88FEC/531/0989 0370141 CONTRIBUTION			10MAY88		
SIMMONS, SCHERYLE MS		DALLAS	TX 75240 HOUSE		
CONGRESSMAN JOE BARTON COMMITTEE			OCTOBER QUARTERLY	GENERAL	1,000
88HSE/362/0787 0614254 CONTRIBUTION		HOUSEWIFE	9SEP88		
SIMMONS, SERENA		DALLAS	TX 75240 SENATE		
JEFFORDS-HACK VICTORY COMMITTEE			JULY QUARTERLY	PRIMARY	2,000
88SEN/013/0154 0451276 CONTRIBUTION		STUDENT	31MAY88		
SIMMONS, SERENA		DALLAS	TX 75240 SENATE		

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CONTRIBUTOR/LENDER/TRANSFERRER / REPORTING ENTITY / MICROFILM LOCATION / TRANSACTION TYPE	STREET ADDRESS	CITY	STATE ZIP	TYPE OF FILER / REPORT TYPE / DATE	ELECTION	AMOUNT
FRIENDS OF CONNIE MACK 88SEN/016/2465 0498936 MEMO(FILER'S % OF CONTRB GIVEN TO JT FR)		STUDENT		E-PRIMARY 31MAY89	PRIMARY AMENDMENT	1,000
SIMMONS, SERENA PEOPLE FOR JOHN HEINZ COMMITTEE 88SEN/019/3907 0563557 CONTRIBUTION		DALLAS STUDENT	TX 75240	SENATE OCTOBER QUARTERLY 22JUL88	GENERAL	1,000
SIMMONS, SERENA MS FRIENDS OF VOINOVICH 88SEN/008/2932 0306608 CONTRIBUTION		DALLAS	TX 75240	SENATE APRIL QUARTERLY 22FEB88	PRIMARY	1,000
SIMMONS, SHERWIN P MR DNC SERVICES CORPORATION/DEMOCRATIC NATIONAL COMMITTEE 88FEC/569/3539 0676607 CONTRIBUTION		TAMPA	FL 33629	PARTY QUALIFIED POST-GENERAL 4NOV88	PRIMARY	1,000
SIMMONS, STEVEN J DUKAKIS FOR PRESIDENT COMMITTEE, INC 88FEC/531/0505 0365910 CONTRIBUTION		GREENWICH SIMMONS COMMUNICATION	CT 06830	PRESIDENTIAL JUNE MONTHLY 10MAY88	PRIMARY	1,000
SIMMONS, STEVEN J LICHT '88 COMMITTEE 88SEN/015/2826 0480917 CONTRIBUTION		GREENWICH SIMMONS COMMUNICATIONS COMPANY	CT 06830	SENATE PRE-PRIMARY 1AUG88	PRIMARY	1,000
SIMMONS, STEVEN J RE-ELECT CONGRESSMAN CHUCK SCHUMER 88HSE/359/0542 0496649 CONTRIBUTION		STAMFORD SIMMONS COMMUNICATIONS	CT 06905	HOUSE PRE-PRIMARY 5JUL88	PRIMARY	500
DEMOCRATIC CONGRESSIONAL CAMPAIGN COMMITTEE INC 87HSE/337/4818 0084259 CONTRIBUTION MADE TO NON-AFFILIATED				PARTY QUALIFIED AUGUST MONTHLY 14JUL87	PRIMARY	167
SIMMONS, TED JAY NIXON FOR UNITED STATES SENATE 88SEN/008/2758 0316968 CONTRIBUTION		CHESTERFIELD	MO 63017	SENATE APRIL QUARTERLY 10FEB88	PRIMARY	500
SIMMONS, TED L MR GEPHARDT FOR PRESIDENT COMMITTEE INC 88FEC/514/0852 0272668 CONTRIBUTION		CHESTERFIELD	MO 63017	PRESIDENTIAL MARCH MONTHLY 5FEB88	PRIMARY	1,000
SIMMONS, TERRY L MR LACEY SMITH FOR CONGRESS 88HSE/341/2765 0256397 CONTRIBUTION		WEST PADUCAH SIMMONS ENGINEERING	KY 42086	HOUSE YEAR-END 18DEC87	PRIMARY	500
SIMMONS, THOMAS D HECHT REELECTION COMMITTEE 88SEN/007/1987 0334537 CONTRIBUTION		HOUSTON TRAMMELL CROW	TX 77027	SENATE APRIL QUARTERLY 24FEB88	PRIMARY	1,000

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SIMMONS, THOMAS D JR TRANNELL CROW PARTNERS [illegible] COMMITTEE 88FEC/559/0478 0563845 [illegible]BUTION	HOUSTON TRANNELL CROW CO	TX 77027 NON-PARTY QUALIFIED OCTOBER MONTHLY 25SEP88	PRIMARY	1,000
SIMMONS, THOMAS D JR MR GEORGE BUSH FOR PRESIDENT, INC 87FEC/475/2543 0052660 CONTRIBUTION	HOUSTON	TX 77027 PRESIDENTIAL JULY QUARTERLY 08MY87	PRIMARY	1,000
SIMMONS, THOMAS D JR MR SENATOR LLOYD BENTSEN ELECTION COMMITTEE 87SEN/007/3237 0146381 CONTRIBUTION	HOUSTON TRANNEL CROW CO	TX 77027 SENATE MID-YEAR REPORT 22APR87	GENERAL	500
SIMMONS, THOMAS P TOM CAMPBELL FOR CONGRESS COMMITTEE 88HSE/350/4202 0363769 CONTRIBUTION	LOS ALTOS HILLS THOMAS MC KINNIN	CA 94022 HOUSE PRE-PRIMARY 26APR88	PRIMARY	500
SIMMONS, TIFTON JR GEORGE BUSH FOR PRESIDENT, INC 87FEC/475/1715 0047330 CONTRIBUTION	NEW YORK	NY 10105 PRESIDENTIAL JULY QUARTERLY 14APR87	PRIMARY	1,000
SIMMONS, TIFTON JR SMITH BARNEY BETTER GOVERNMENT COMMITTEE 87FEC/477/2199 0067499 CONTRIBUTION	NEWBURGH SBHU	NY 12550 NON-PARTY QUALIFIED JULY QUARTERLY 24AUG87	PRIMARY	5,000

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SIMMONS, TIFTON JR SMITH BARNEY BETTER GOVERNMENT COMMITTEE 88FEC/513/4652 0267800 CONTRIBUTION		NEWBURGH SBHU	NY 12550 NON-PARTY QUALIFIED MARCH MONTHLY 08FEB88	PRIMARY	5,000
SIMMONS, TIFTON JR NEW JERSEY REPUBLICAN STATE COMMITTEE 88FEC/556/3953 0530524 CONTRIBUTION		NEW YORK SMITH BARNEY	NY 10105 PARTY QUALIFIED OCTOBER QUARTERLY 25SEP88	PRIMARY	1,200
SIMMONS, TIFTON JR MR DNC SERVICES CORPORATION/DEMOCRATIC NATIONAL COMMITTEE 88FEC/557/1106 0587900 CONTRIBUTION		NEWBURGH SMITH BARNEY	NY 12550 PARTY QUALIFIED OCTOBER MONTHLY 21SEP88	PRIMARY	2,000
SIMMONS, V A MRS PRICE FOR CONGRESS COMMITTEE 88HSE/366/2270 0655295 CONTRIBUTION		RALEIGH RETIRED	NC 27604 HOUSE PRE-GENERAL 17OCT88	GENERAL	1,000
SIMMONS, V A MRS PRICE FOR CONGRESS COMMITTEE 88HSE/366/2293 0658339 CONTRIBUTION REF TO INDIVIDUAL		RALEIGH	NC 27604 HOUSE PRE-GENERAL 19OCT88	GENERAL	200-
SIMMONS, VERN CALIFORNIANS FOR PETE WILSON 1994 88SEN/009/3246 0375225 CONTRIBUTION		RANCHO SANTA FE REAL ESTATE INVEST	CA 92067 SENATE PRE-PRIMARY 17MAY88	PRIMARY	500

SIMMONS, W H MR TRENT LOTT FOR MISSISSI 88SEN/026/1790 0640 RIBUTION	COLUMBUS FIRST COLUMB	MS 39703 SENATE POST-GENERAL 4NOV88	GENERAL	500
SIMMONS, W J MR THOMAS COLLINS CONGRESSIONAL CAMPAIGN COMMITTEE 88HSE/362/1381 0565236 CONTRIBUTION	JACKSON	MS 39202 HOUSE OCTOBER QUARTERLY 20SEP88	GENERAL	640
SIMMONS, W J MRS THOMAS COLLINS CONGRESSIONAL CAMPAIGN COMMITTEE 88HSE/362/1381 0565233 CONTRIBUTION	JACKSON	MS 39202 HOUSE OCTOBER QUARTERLY 20SEP88	GENERAL	1,000
SIMMONS, W L NANCY PELOSI FOR CONGRESS 87HSE/333/2042 0039328 CONTRIBUTION	NAPA RETIRED	CA 94558 HOUSE PRE-GENERAL 27MAR87	PRIMARY	500
SIMMONS, W L MR NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS * 88SEN/024/1423 0664877 CONTRIBUTION	NAPA BUSINESS CONSULTANT	CA 94558 PARTY QUALIFIED POST-GENERAL 24OCT88	PRIMARY	1,000
SIMMONS, W L MR NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS * 88SEN/024/1423 0673606 CONTRIBUTION	NAPA BUSINESS CONSULTANT	CA 94558 PARTY QUALIFIED POST-GENERAL 24OCT88	PRIMARY	1,000

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SIMMONS, WENDELL L MIKE BILIRAKIS FOR CONGRESS 88HSE/340/3843 0255104 CONTRIBUTION		PALM HARBOR SIMMONS REALTY	FL 34684 HOUSE YEAR-END 20AUG87	PRIMARY	500
SIMMONS, WILBUR MCMILLEN FOR CONGRESS 88HSE/354/3561 0438806 CONTRIBUTION		COLUMBIA KMS GROUP INC	MO 21045 HOUSE JULY QUARTERLY 28APR88	GENERAL	1,000
SIMMONS, WILLIAM J TRENT LOTT FOR MISSISSIPPI 88SEN/008/1139 0335459 CONTRIBUTION		JACKSON	MS SENATE APRIL QUARTERLY 22MAR88	GENERAL	500
SIMMONS, WILLIAM J MR TRENT LOTT FOR MISSISSIPPI 88SEN/013/0600 0418774 CONTRIBUTION		JACKSON	MS 39202 SENATE JULY QUARTERLY 7JUN88	GENERAL	500
SIMMONS, WILLIAM J MRS TRENT LOTT FOR MISSISSIPPI 88SEN/013/0647 0418972 CONTRIBUTION		JACKSON HOUSEWIFE	MS 39202 SENATE JULY QUARTERLY 7JUN88	GENERAL	1,000
SIMMONS, WILLIS B MR TOMMY HUDSON COMMITTEE 87HSE/338/0046 0155406 CONTRIBUTION		BATON ROUGE CONTRACTOR	LA 70809 HOUSE MID-YEAR REPORT 25MAY87	PRIMARY	500

SIMMONS, Y J BUDDY MACKAY CAMPAIGN FUND 08SEN/011/3771 8463737 CONTRIBUTION	OCALA GREEN SIMMONS ETAL	[redacted] 32670 SENATE JULY QUARTERLY 30JUN88	PRIMARY	500
SIMMONS, Y J BUDDY MACKAY CAMPAIGN FUND 08SEN/016/1447 8496840 CONTRIBUTION	OCALA GREEN SIMMONS ETAL	FL 32670 SENATE PRE-RUN-OFF 12SEP88	RUNOFF	500
SIMMONS, Y J JON MILLS FOR CONGRESS 08HSE/374/03B1 8669293 CONTRIBUTION	OCALA LAWYER	FL 32670 HOUSE POST-GENERAL 17OCT88	GENERAL	500

CONTRIBUTOR/LENDER/TRANSFERRER REPORTING ENTITY MICROFILM LOCATION	STREET ADDRESS TRANSACTION TYPE	CITY	STATE ZIP	TYPE OF FILER REPORT TYPE DATE	ELECTION	AMOUNT
CONTRIBUTION	368	427,540				
EARMARKED CONTRIBUTION	2	2,000				
MEMO(FILER'S % OF CONTRB GIVEN TO JT FR)	29	33,272				
CONTRIBUTION REF TO INDIVIDUAL	29	21,206-				
CONTRIBUTION MADE TO NON-AFFILIATED	1	167				
TOTAL	429	441,773				

SEARCH MENU

The following fields may be searched by menu:

1.	NAME	CONTRIBUTOR NAME
2.	PPB	PRINCIPLE PLACE OF BUSINESS
3.	CITY	CITY
4.	STATE	STATE
5.	ZIP	ZIP CODE
6.	RPTTY	REPORT CODE
7.	AI	AMENDMENT INDICATOR
8.	TRNTY	TRANSACTION CODE
9.	ACTDT	TRANSACTION DATE
10.	AMT	TRANSACTION AMOUNT
11.	ID	REPORTING COMMITTEE ID#
12.	OTHID	RECEIVING COMMITTEE ID#

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SENSITIVE

FIRST GENERAL COUNSEL'S REPORT

Pre-MUR 230
STAFF MEMBER: Frances B. Hagan

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

RESPONDENTS: Dwayne O. Andreas
Dorothy Inez Andreas
Caroline Rose Hunt
Henry Kravis
Raymond Kravis
Ronald O. Perelman
Ira Riklis
Meshulam Riklis
Harold C. Simmons
Donald J. Trump

RELEVANT STATUTES: 2 U.S.C. § 441a(a)(3)
2 U.S.C. § 441a(a)(1)(A)
2 U.S.C. § 441a(a)(1)(C)
2 U.S.C. § 441a(f)

INTERNAL REPORTS CHECKED: Disclosure reports; FEC indexes

FEDERAL AGENCIES CHECKED: None

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I. GENERATION OF MATTER

A recent newspaper article reported that 10 individuals have exceeded the $25,000 annual aggregate limit on contributions in violation of the Federal Election Campaign Act of 1971, as amended ("the Act"). By memorandum dated April 20, 1990, the Commissioners requested the Office of the General Counsel to prepare a report on these allegations.[1] Accordingly, this matter, designated as Pre-MUR 230, has been internally generated

1. The referral package was circulated to the Commission on April 27, 1990. Thus, it is not duplicated as an attachment to this report.

as contemplated by Commission Directive 6.

II. FACTUAL AND LEGAL ANALYSIS

Introduction

The factual allegations are contained in an article from the Los Angeles Times, April 18, 1990. According to the L.A. Times, its researchers used FEC computer searches "to focus on the political giving habits of more than 100 of the nation's wealthiest and most influential citizens..." The newspaper's search indicated that 10 of those individuals appeared to have exceeded the 1988 annual contribution limit.

The article also alleged that family members of the 10 largest contributors sometimes gave contributions to some of the same candidates and may have discussed the contributions within the family. There were no allegations that minor children made contributions in violation of the Act. See 11 C.F.R. § 110.1(i)(2). Further, the article stated that some contributors may have made "soft money" contributions to state party committees to influence elections. Such activities do not appear to result in a violation of the Act.

This Office researched FEC indexes and disclosure reports to examine contributions by the 10 individuals who allegedly exceeded the annual contribution limits. Our review and recommendations address their particular contribution activity.

Excessive Contributions per Calendar Year

2 U.S.C. § 441a(a)(3) limits total contributions by an individual in any calendar year to $25,000. 11 C.F.R. § 110.5(c)(2) states that any contribution to a candidate or

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authorized committee with respect to a particular election made in a non-election year shall be considered to be made during the calendar year in which such election is held.

The newspaper article alleged that 10 individuals made contributions in excess of the annual limit. Our review of the 10 contributors revealed the following:[2]

CONTRIBUTOR	1988 TOTAL CONTRIBUTIONS[3]	AMOUNT IN EXCESS OF LIMITATIONS
1. Dorothy Inez Andreas	$29,680	$ 4,680
2. Dwayne O. Andreas	$37,680	$12,680
3. Caroline Rose Hunt	$32,700	$ 7,700
4. Henry Kravis	$62,711	$37,711
5. Raymond Kravis	$33,750	$ 8,750
6. Ronald O. Perelman	$32,500	$ 7,500
7. Meshulam Riklis	$26,000	$ 1,000
8. Ira Riklis	$29,500	$ 4,500
9. Harold C. Simmons	$64,626	$39,626
10. Donald J. Trump	$46,800	$21,800

In addition, Harold C. Simmons made contributions of $26,250 in 1989, thereby apparently exceeding the 1989 annual limit by $1,250.

Based on this information, this Office recommends that the

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2. The information was obtained from the FEC's "D" index listing contributions of $500 or more.

3. These totals include reductions for refunds, redesignations, and reattributions only if such actions appeared to be timely pursuant to 11 C.F.R. § 110.1(b)(3). Late remedial actions, which do not vitiate the violation, may be considered in conciliation negotiations.

Commission find reason to believe that the 10 individuals noted above violated 2 U.S.C. § 441a(a)(3).

Excessive Contributions to Committees

2 U.S.C. § 441a(a)(1)(A) limits individual contributions to federal candidates to $1,000 per election. 2 U.S.C. § 441a(a)(1)(C) limits individual contributions to political committees (other than candidate committees and party committees) to $5,000 per calendar year. 2 U.S.C. § 441a(f) provides that "[n]o candidate or political committee shall knowingly accept any contribution...in violation of the provisions of this section."

Our review of annual contributions revealed apparent excessive contributions as follows:

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Dorothy Inez Andreas

Recipient Committee	Amount	Date of Contribution	Amount of Excessive
Jesse Jackson for President	$1,000	4/01/88 (88P)	
	$1,000	4/01/88 (88P)	$1,000

Caroline Hunt

Recipient Committee	Amount	Date of Contribution	Amount of Excessive
Conservative Victory Committee (non-party)	$5,000	7/01/88	
	$1,000	7/25/88	$1,000

Henry Kravis

Recipient Committee	Amount	Date of Contribution	Amount of Excessive
Californians for Sen. Pete Wilson	$1,000	12/08/87 (88P)*	
	$1,000	12/08/87 (88G)	
	$1,000	9/19/88 (88P)	$1,000

Henry Kravis (continued)

People for John Heinz Committee	$1,000	5/11/88 (88G)	
	$1,000	6/01/88 (88G)**	$1,000

Harold C. Simmons

Conservatives Acting for Texans PAC	$5,000	2/18/88	
	$5,000	8/12/88	$5,000

*reattributed to spouse 9/19/88
**refunded to contributor 10/27/88

Based on this information, this Office recommends that the Commission find reason to believe that Dorothy Inez Andreas and Henry Kravis violated 2 U.S.C. § 441a(a)(1)(A), and that Caroline Hunt and Harold C. Simmons violated 2 U.S.C. § 441a(a)(1)(C).

III. RECOMMENDATIONS

1. Open a MUR.

2. Find reason to believe that the following individuals violated 2 U.S.C. § 441a(a)(3):

   a) Dorothy Inez Andreas;
   b) Dwayne O. Andreas;
   c) Caroline Rose Hunt;
   d) Henry Kravis;
   e) Raymond Kravis;
   f) Ronald O. Perelman;
   g) Ira Riklis;
   h) Meshulam Riklis;
   i) Harold C. Simmons;
   j) Donald J. Trump.

3. Find reason to believe that the following individuals violated 2 U.S.C § 441a(a)(1)(A):

   a) Dorothy Inez Andreas;
   b) Henry Kravis.

4. Find reason to believe that the following individuals violated 2 U.S.C. § 441a(a)(1)(C).

   a) Caroline Hunt;
   b) Harold C. Simmons.

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5. Approve the appropriate letters and Factual and Legal Analyses.

Lawrence M. Noble
General Counsel

7/31/90
Date

BY: _____
Lois G. Lerner
Associate General Counsel

Attachment:

Factual and Legal Analyses (10)
Contribution lists

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Dwayne O. Andreas; Dorothy Inez Andreas; Caroline Rose Hunt; Henry Kravis; Raymond Kravis; Ronald O. Perelman; Ira Riklis; Meshulam Riklis; Harold C. Simmons; Donald J. Trump.	)	Pre-MUR 230 (MUR 3104)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on August 3, 1990, the Commission decided by a vote of 6-0 to take the following actions in Pre-MUR 230:

1. Open a MUR.

2. Find reason to believe Dorothy Inez Andreas; Dwayne O. Andreas; Caroline Rose Hunt; Henry Kravis; Raymond Kravis; Ronald O. Perelman; Ira Riklis; Meshulam Riklis; Harold C. Simmons and Donald J. Trump violated 2 U.S.C. § 441a(a)(3).

3. Find reason to believe Dorothy Inez Andreas and Henry Kravis violated 2 U.S.C. § 441a(a)(1)(A).

4. Find reason to believe Caroline Hunt and Harold C. Simmons violated 2 U.S.C. § 441a(a)(1)(C).

(Continued)

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5. Approve the letters and Factual and Legal Analyses, as recommended in the General Counsel's Report dated July 31, 1990.

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

Attest:

8-6-90
Date

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

Received in the Secretariat: Wed., Aug., 1, 1990 12:07 p.m.
Circulated to the Commission: Wed., Aug., 1, 1990 4:00 p.m.
Deadline for vote: Fri., Aug., 3, 1990 4:00 p.m.

dr

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 17, 1990

Ms. Dorothy Inez Andreas
9909 Collins Avenue
Bal Harbor
Miami Beach, Florida 33154

RE: MUR 3104
Dorothy Inez Andreas

Dear Ms. Andreas:

On August 3, 1990, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. §§ 441a(a)(1)(A) and 441a(a)(3), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office and answer the following question within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath:

> List all contributions of any amount (including those less than $500.00) that you gave to any candidate for federal office in connection with the 1988 election cycle. This includes contributions made before and after 1988 that are attributable to the 1988 elections. Provide documentation for each of these contributions.

In the absence of any additional information demonstrating that no further action should be taken against you, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

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.

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Further, the Commission will not entertain requests for pre-probable cause conciliation 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 the General Counsel ordinarily will not give extensions beyond 20 days.

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

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 investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Frances B. Hagan, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,

Lee Ann Elliott

Lee Ann Elliott
Chairman

Enclosures
1. Factual and Legal Analysis
2. Contribution List
3. Procedures
4. Designation of Counsel Form

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Dorothy Inez Andreas MUR: 3104

Introduction

According to an article in the Los Angeles Times, certain individuals appear to have exceeded the 1988 annual contribution limit. Based on the L.A. Times allegations and at the Commission's direction, the Office of the General Counsel researched FEC indexes and disclosure reports to examine contributions by individuals who allegedly exceeded the annual contribution limits.

Excessive Contributions per Calendar Year

2 U.S.C. § 441a(a)(3) limits total contributions by an individual in any calendar year to $25,000. 11 C.F.R. § 110.5(c)(2) states that any contribution to a candidate or authorized committee with respect to a particular election made in a non-election year shall be considered to be made during the calendar year in which such election is held.

Our review of contributions revealed that in calendar year 1988, Dorothy Inez Andreas made contributions totaling $29,680, or $4,680 in excess of the annual limit.[1]

Excessive Contributions to Candidate Committee

2 U.S.C. § 441a(a)(1)(A) limits individual contributions to federal candidates to $1,000 per election.

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1. The information was obtained from the FEC's "D" index listing contributions of $500 or more.

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Our review of annual contributions revealed apparent excessive contributions to a candidate committee, as follows:

Dorothy Inez Andreas

Recipient Committee	Amount	Date of Contribution	Amount of Excessive
Jesse Jackson for President	$1,000	4/01/88	
	$1,000	4/01/88	$1,000

Therefore, there is reason to believe that Dorothy Inez Andreas violated 2 U.S.C. §§ 441a(a)(1)(A) and 441a(a)(3).

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DOROTHY INEZ ANDREAS

LAST	FIRST	AMOUNT	P/G	YOE	DATE	CANDIDATE/CMTE
ANDREAS	INEZ	$1,000.00	P	88	17-FEB-1987	BYRD,FRIENDS OF ROBE
ANDREAS	INEZ	$1,000.00	P	88	17-MAR-1987	DURENBERGER FOR SEN
ANDREAS	INEZ	$1,000.00	G	88	02-APR-1987	GARZA, KIKA DE LA FO
ANDREAS	INEZ	$1,000.00	P	88	03-JUN-1987	SIMON,PAUL FOR PRES.
ANDREAS	INEZ	$1,000.00	P	88	17-SEP-1987	HECHT REELECTION CMT
ANDREAS	INEZ	$1,000.00	P	88	15-OCT-1987	KARNES,CMT FOR SAM
ANDREAS	DWAYNE MRS	$1,000.00	P	88	04-NOV-1987	BENTSEN; SEN. LLOYD
ANDREAS	INEZ	$1,000.00	P	88	24-NOV-1987	BURDICK CAMPAIGN CMT
ANDREAS	INEZ	$1,000.00	P	88	04-NOV-1987	BENTSEN; SEN LLOYD
ANDREAS	INEZ	$1,000.00	P	88	07-DEC-1987	WRIGHT APPRECIATION
ANDREAS	INEZ	$1,000.00	P	88	17-DEC-1987	BONKER FOR CONGR.
ANDREAS	INEZ	$1,000.00	P	88	12-FEB-1988	ASKEW FOR SENATE
ANDREAS	INEZ	$1,000.00	P	88	12-FEB-1988	LEHMAN,WILLIAM CAMP
ANDREAS	INEZ	$1,000.00	P	88	16-MAR-1988	GIBBONS,CMT FOR SAM
ANDREAS	INEZ	$1,000.00	P	88	01-APR-1988	JACKSON,JESSE FOR PR
ANDREAS	INEZ	$1,000.00	P	88	01-APR-1988	JACKSON,JESSE FOR PR
ANDREAS	INEZ	$1,000.00	P	88	04-APR-1988	GORE,ALBERT FOR PRES
ANDREAS	INEZ	$1,000.00	P	88	22-APR-1988	MACK,FRIENDS OF CONN
ANDREAS	INEZ	$1,000.00	P	88	24-MAY-1988	DEM.SENATORIAL CAMP
ANDREAS	INEZ	$1,000.00	P	88	25-MAY-1988	DUKAKIS FOR PRES
ANDREAS	INEZ	$5,000.00	P	88	01-JUN-1988	REPUBLICAN NAT'L CMT
ANDREAS	INEZ	($320.00)	P	88	20-JUN-1988	ASKEW FOR SENATE
ANDREAS	INEZ	$1,000.00	P	88	30-JUN-1988	MOODY,FRIENDS OF JIM
ANDREAS	INEZ	$1,000.00	G	88	06-OCT-1988	GLICKMAN FOR CONGRES
ANDREAS	INEZ	$1,000.00	P	88	07-OCT-1988	CAMPAIGN AMERICA
ANDREAS	INEZ	$1,000.00	G	88	28-OCT-1988	MACK,FRIENDS OF CONN
ANDREAS	D O MRS	$1,000.00	G	88	16-NOV-1988	MICHEL FOR CONG CMTE
ANDREAS	INEZ	$1,000.00	G	88	19-NOV-1988	DURENBERGER FOR SEN
	TOTAL	$29,680.00				

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 17, 1990

Mr. Dwayne O. Andreas
9909 Collins Avenue
Bal Harbor
Miami Beach, Florida 33154

RE: MUR 3104
Dwayne O. Andreas

Dear Mr. Andreas:

On August 3, 1990, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(3), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office and answer the following question within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath:

> List all contributions of any amount (including those less than $500.00) that you gave to any candidate for federal office in connection with the 1988 election cycle. This includes contributions made before and after 1988 that are attributable to the 1988 elections. Provide documentation for each of these contributions.

In the absence of any additional information demonstrating that no further action should be taken against you, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

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.

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Further, the Commission will not entertain requests for pre-probable cause conciliation 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 the General Counsel ordinarily will not give extensions beyond 20 days.

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

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 investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Frances B. Hagan, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,

Lee Ann Elliott

Lee Ann Elliott
Chairman

Enclosures
1. Factual and Legal Analysis
2. Contribution List
3. Procedures
4. Designation of Counsel Form

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Dwayne O. Andreas MUR:3104

Introduction

According to an article in the Los Angeles Times, certain individuals appear to have exceeded the 1988 annual contribution limit. Based on the L.A. Times allegations and at the Commission's direction, the Office of the General Counsel researched FEC indexes and disclosure reports to examine contributions by individuals who allegedly exceeded the annual contribution limits.

Excessive Contributions per Calendar Year

2 U.S.C. § 441a(a)(3) limits total contributions by an individual in any calendar year to $25,000. 11 C.F.R. § 110.5(c)(2) states that any contribution to a candidate or authorized committee with respect to a particular election made in a non-election year shall be considered to be made during the calendar year in which such election is held.

Our review of contributions revealed that in calendar year 1988, Dwayne O. Andreas made contributions totaling $37,680, or $12,680 in excess of the annual limit.[1] Therefore, there is reason to believe that Dwayne O. Andreas violated 2 U.S.C. § 441a(a)(3).

1. The information was obtained from the FEC's "D" index listing contributions of $500 or more.

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DWAYNE ANDREAS

LAST	FIRST	AMOUNT	P/G	YOE	DATE	CANDIDATE/CMTE
ANDREAS	DWAYNE	$1,000.00	P	88	17-FEB-1987	BYRD; FR OF ROBERT C
ANDREAS	DWAYNE	$1,000.00	P	88	20-FEB-1987	GEPHART FOR PRESIDEN
ANDREAS	DWAYNE	$1,000.00	P	88	17-MAR-1987	DURENBERGER FR SEN
ANDREAS	D O	$1,000.00	G	88	02-APR-1987	GARZA,KIKA DE LA FOR
ANDREAS	DWAYNE	$1,000.00	P	88	22-APR-1987	RIEGLE FOR SENATE'88
ANDREAS	D O	$1,000.00	P	88	03-JUN-1987	SIMON, PAUL FR PRES
ANDREAS	DWAYNE	$1,000.00	P	88	06-JUN-1987	MELCHER FOR SENATE
ANDREAS	D O	$1,000.00	P	88	15-JUN-1987	HATCH ELECTION CMT
ANDREAS	DWAYNE	$1,000.00	P	88	17-SEP-1987	HECHT REELECT
ANDREAS	D O	$1,000.00	P	88	15-OCT-1987	KARNES;FR OF DAVID
ANDREAS	DWAYNE	$1,000.00	P	88	04-NOV-1987	BENTSEN;SEN LLOYD C
ANDREAS	D O	$1,000.00	P	88	24-NOV-1987	BURDICK CAMP CMT
ANDREAS	D O	$1,000.00	P	88	07-DEC-1987	WRIGHT APPRECIATION FND
ANDREAS	D O	$1,000.00	P	88	17-DEC-1987	BONKER FOR CONGRESS
ANDREAS	DWAYNE	$1,000.00	P	88	21-DEC-1987	FASCELL;DANTE B CON
ANDREAS	DWAYNE	$1,000.00	P	88	12-FEB-1988	ASKEW FOR SENATE
ANDREAS	DWAYNE	$1,000.00	P	88	16-MAR-1988	GIBBONS;CMTE FR SAM
ANDREAS	DWAYNE	$1,000.00	P	88	04-APR-1988	GORE, ALBERT PRES
ANDREAS	DWAYNE	$1,000.00	P	88	14-APR-1988	GRAY US SENATE
ANDREAS	DWAYNE	$1,000.00	P	88	22-APR-1988	MACK; FR OF CONNIE
ANDREAS	D O	$1,000.00	P	88	28-APR-1988	CMT FOR DEM.OPPORTUNITY
ANDREAS	DWAYNE	$5,000.00	P	88	06-APR-1988	ADM CO. (ADM PAC)
ANDREAS	DWAYNE	$1,000.00	P	88	22-MAY-1988	LUGAR; FR OF DICK
ANDREAS	DWAYNE	$1,000.00	P	88	24-MAY-1988	DSCC
ANDREAS	DWAYNE	$1,000.00	P	88	25-MAY-1988	DUKAKIS FOR PRESIDENT
ANDREAS	DWAYNE	$5,000.00	P	88	01-JUN-1988	RNC
ANDREAS	DWAYNE	$1,000.00	G	88	07-JUN-1988	METZENBAUM SEN '88
ANDREAS	DWAYNE	($320.00)	P	88	20-JUN-1988	ASKEW FOR SENATE
ANDREAS	D O	$1,000.00	G	88	05-AUG-1988	MICHEL FOR CONG. CMTE
ANDREAS	DWAYNE	$1,000.00	G	88	28-OCT-1988	MACK; FR OF CONNIE
ANDREAS	DWAYNE	$1,000.00	G	88	19-NOV-1988	DURENBERGER; US SENA
	TOTAL	$37,680.00				

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 17, 1990

Ms. Caroline Rose Hunt
Rosewood Corporation
100 Crescent Court, Suite 1700
Dallas, Texas 75201

RE: MUR 3104
Caroline Rose Hunt

Dear Ms. Hunt:

On August 3, 1990, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. §§ 441a(a)(1)(C) and 441a(a)(3), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office and answer the following question within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath:

> List all contributions of any amount (including those less than $500.00) that you gave to any candidate for federal office in connection with the 1988 election cycle. This includes contributions made before and after 1988 that are attributable to the 1988 elections. Provide documentation for each of these contributions.

In the absence of any additional information demonstrating that no further action should be taken against you, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

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.

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Further, the Commission will not entertain requests for pre-probable cause conciliation 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 the General Counsel ordinarily will not give extensions beyond 20 days.

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

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 investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Frances B. Hagan, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,

Lee Ann Elliott

Lee Ann Elliott
Chairman

Enclosures
1. Factual and Legal Analysis
2. Contribution List
3. Procedures
4. Designation of Counsel Form

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Caroline Rose Hunt **MUR:** 3104

Introduction

According to an article in the Los Angeles Times, certain individuals appear to have exceeded the 1988 annual contribution limit. Based on the L.A. Times allegations and at the Commission's direction, the Office of the General Counsel researched FEC indexes and disclosure reports to examine contributions by individuals who allegedly exceeded the annual contribution limits.

Excessive Contributions per Calendar Year

2 U.S.C. § 441a(a)(3) limits total contributions by an individual in any calendar year to $25,000. 11 C.F.R. § 110.5(c)(2) states that any contribution to a candidate or authorized committee with respect to a particular election made in a non-election year shall be considered to be made during the calendar year in which such election is held.

Our review of contributions revealed that in calendar year 1988, Caroline Rose Hunt made contributions totaling $32,700, or $7,700 in excess of the annual limit.[1]

Excessive Contributions to a Committee

2 U.S.C. § 441a(a)(1)(C) limits individual contributions to political committees (other than candidate committees and party

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1. The information was obtained from the FEC's "D" index listing contributions of $500 or more.

committees) to $5,000 per calendar year.

Our review of annual contributions revealed apparent excessive contributions to a committee as follows:

Caroline Hunt

Recipient Committee	Amount	Date of Contribution	Amount of Excessive
Conservative Victory Committee (non-party)	$5,000 $1,000	7/01/88 7/25/88	$1,000

Therefore, there is reason to believe that Caroline Rose Hunt violated 2 U.S.C. §§ 441a(a)(1)(C) and 441a(a)(3).

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CAROLINE HUNT

LAST	FIRST	AMOUNT	P/G	YOE	DATE	CANDIDATE/CMTE
HUNT	CAROLINE	$1,000.00	P	88	22-JUN-1987	ARMEY,FRIENDS OF DIC
HUNT	CAROLINE	$1,000.00	G	88	22-JUN-1987	ARMEY,FRIENDS TO DIC
HUNT	CAROLINE	$10,000.00	P	88	18-APR-1988	REP. NAT'L CMTE
HUNT	CAROLINE	$12,000.00	P	88	25-APR-1988	REP. PRESIDENT DINNE
HUNT	CAROLINE	$1,000.00	P	88	04-MAY-1988	COTTONWOOD PAC
HUNT	CAROLINE	$1,000.00	G	88	09-MAY-1988	BUSH,GEORGE FOR PRES
HUNT	CAROLINE	$700.00	P	88	15-JUN-1988	JEFFORDS-MACK VICTOR
HUNT	CAROLINE	$5,000.00	P	88	01-JUL-1988	CONSERVATIVE VICTORY
HUNT	CAROLINE	$1,000.00	P	88	25-JUL-1988	CONSERVATIVE VICTORY
	TOTAL	$32,700.00				

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 17, 1990

Mr. Henry Kravis
Kolberg, Kravis, Roberts
71 East 71st Street
New York, NY 10021

RE: MUR 3104
Henry Kravis

Dear Mr. Kravis:

On August 3, 1990, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. §§ 441a(a)(1)(A) and 441a(a)(3), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office and answer the following question within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath:

> List all contributions of any amount (including those less than $500.00) that you gave to any candidate for federal office in connection with the 1988 election cycle. This includes contributions made before and after 1988 that are attributable to the 1988 elections. Provide documentation for each of these contributions.

In the absence of any additional information demonstrating that no further action should be taken against you, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

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.

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Further, the Commission will not entertain requests for pre-probable cause conciliation 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 the General Counsel ordinarily will not give extensions beyond 20 days.

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

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 investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Frances B. Hagan, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,

Lee Ann Elliott

Lee Ann Elliott
Chairman

Enclosures
1. Factual and Legal Analysis
2. Contribution List
3. Procedures
4. Designation of Counsel Form

9304093277

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Henry Kravis MUR:3104

Introduction

According to an article in the Los Angeles Times, certain individuals appear to have exceeded the 1988 annual contribution limit. Based on the L.A. Times allegations and at the Commission's direction, the Office of the General Counsel researched FEC indexes and disclosure reports to examine contributions by individuals who allegedly exceeded the annual contribution limits.

Excessive Contributions per Calendar Year

2 U.S.C. § 441a(a)(3) limits total contributions by an individual in any calendar year to $25,000. 11 C.F.R. § 110.5(c)(2) states that any contribution to a candidate or authorized committee with respect to a particular election made in a non-election year shall be considered to be made during the calendar year in which such election is held.

Our review of contributions revealed that in calendar year 1988, Henry Kravis made contributions totaling $62,711, or $37,711 in excess of the annual limit.[1]

Excessive Contributions to Candidate Committees

2 U.S.C. § 441a(a)(1)(A) limits individual contributions to federal candidates to $1,000 per election.

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1. The information was obtained from the FEC's "D" index listing contributions of $500 or more.

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Our review of annual contributions revealed apparent excessive contributions to candidate committees, as follows:

Henry Kravis

Recipient Committee	Amount	Date of Contribution	Amount of Excessive
Californians for Sen. Pete Wilson	$1,000	12/08/87 (88P)*	
	$1,000	12/08/87 (88G)	
	$1,000	9/19/88 (88P)	$1,000
People for John Heinz Committee	$1,000	5/11/88 (88G)	
	$1,000	6/01/88 (88G)**	$1,000

*reattributed to spouse 9/19/88
**refunded to contributor 10/27/88

Therefore, there is reason to believe that Henry Kravis violated 2 U.S.C. §§ 441a(a)(1)(A) and 441a(a)(3).

9304093279

HENRY KRAVIS

LAST	FIRST	AMOUNT	P/G	YOE	DATE	CANDIDATE/CMTE
KRAVIS	HENRY	$1,000.00	P	88	28-APR-1987	KEMP, JACK FOR PRES
KRAVIS	HENRY	$1,000.00	P	88	06-MAY-1987	DOLE FOR PRES
KRAVIS	HENRY	$1,000.00	P	88	14-MAY-1987	BUSH, GEORGE PRES
KRAVIS	HENRY	$1,000.00	P	88	21-MAY-1987	BENTSEN, LLOYD SEN
KRAVIS	HENRY	$1,000.00	P	88	12-JUN-1987	DU PONT, PETE PRES
KRAVIS	HENRY	$1,000.00	P	88	30-JUN-1987	DANFORTH FOR SEN
KRAVIS	HENRY	$1,000.00	P	88	24-JUL-1987	CRANSTON FOR PRES
KRAVIS	HENRY	$1,000.00	P	88	20-NOV-1987	METZENBAUM, SEN '88
KRAVIS	HENRY	$1,000.00	G	88	20-NOV-1987	METZENBAUM, SEN '88
KRAVIS	HENRY	$1,000.00	P	88	08-DEC-1987	WILSON, PETE CMTE
KRAVIS	HENRY	($1,000.00)	G	88	08-DEC-1987	WILSON, PETE CMTE
KRAVIS	HENRY	$1,000.00	G	88	15-DEC-1987	BENTSEN, LLOYD SEN
KRAVIS	HENRY	$1,000.00	G	88	28-DEC-1987	DANFORTH FOR SEN
KRAVIS	HENRY	$711.00	P	88	30-DEC-1987	MOYNIHAN CMTE
KRAVIS	HENRY	$289.00	G	88	30-DEC-1987	MOYNIHAN CMTE
KRAVIS	HENRY	$1,000.00	P	88	31-DEC-1987	DAWKINS FOR SEN
KRAVIS	HENRY	$1,000.00	G	88	31-DEC-1987	DAWKINS FOR SEN
KRAVIS	HENRY	$1,000.00	P	88	02-FEB-1988	DUKAKIS FOR PRES
KRAVIS	HENRY	$5,000.00	P	88	23-FEB-1988	NY REP CO CMTE
KRAVIS	HENRY	$1,000.00	P	88	14-MAR-1988	ENGELEITER SEN
KRAVIS	HENRY	$711.00	G	88	14-MAR-1988	MOYNIHAN CMTE
KRAVIS	HENRY	$5,000.00	P	88	21-MAR-1988	FD FOR AMER FUTURE
KRAVIS	HENRY	$1,000.00	G	88	07-MAY-1988	KARNES, DAVID FR OF
KRAVIS	HENRY	$1,000.00	P	88	24-MAY-1988	MONTOYO, RICK SEN
KRAVIS	HENRY	$1,000.00	G	88	11-MAY-1988	HEINZ, JOHN PEO FOR
KRAVIS	HENRY	$1,000.00	G	88	01-JUN-1988	HEINZ, JOHN PEO FOR
KRAVIS	HENRY	$1,000.00	P	88	01-JUN-1988	CHALLENGE 88
KRAVIS	HENRY	$1,000.00	P	88	06-JUN-1988	WALLOP SEN DRIVE
KRAVIS	HENRY	$5,000.00	P	88	20-JUN-1988	NRSC
KRAVIS	HENRY	$5,000.00	P	88	24-JUN-1988	SEN MAJORITY FUND
KRAVIS	HENRY	$10,000.00	P	88	27-JUN-1988	RNC
KRAVIS	HENRY	$5,000.00	P	88	08-SEP-1988	NJ REP STATE CMTE
KRAVIS	HENRY	$1,000.00	P	88	19-SEP-1988	WILSON, PETE CMTE
KRAVIS	HENRY	$1,000.00	P	88	04-OCT-1988	VICTORY '88 CMTE
KRAVIS	HENRY	$1,000.00	G	88	06-OCT-1988	ROTH SEN CMTE
	TOTAL	$62,711.00				

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 17, 1990

Mr. Raymond Kravis
1804 First National Building
Tulsa, Oklahoma 74103

RE: MUR 3104
Raymond Kravis

Dear Mr. Kravis:

On August 3, 1990, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(3), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office and answer the following question within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath:

> List all contributions of any amount (including those less than $500.00) that you gave to any candidate for federal office in connection with the 1988 election cycle. This includes contributions made before and after 1988 that are attributable to the 1988 elections. Provide documentation for each of these contributions.

In the absence of any additional information demonstrating that no further action should be taken against you, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

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.

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Further, the Commission will not entertain requests for pre-probable cause conciliation 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 the General Counsel ordinarily will not give extensions beyond 20 days.

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

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 investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Frances B. Hagan, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,

Lee Ann Elliott

Lee Ann Elliott
Chairman

Enclosures
1. Factual and Legal Analysis
2. Contribution List
3. Procedures
4. Designation of Counsel Form

9304093282

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Raymond Kravis MUR: 3104

Introduction

According to an article in the Los Angeles Times, certain individuals appear to have exceeded the 1988 annual contribution limit. Based on the L.A. Times allegations and at the Commission's direction, the Office of the General Counsel researched FEC indexes and disclosure reports to examine contributions by individuals who allegedly exceeded the annual contribution limits.

Excessive Contributions per Calendar Year

2 U.S.C. § 441a(a)(3) limits total contributions by an individual in any calendar year to $25,000. 11 C.F.R. § 110.5(c)(2) states that any contribution to a candidate or authorized committee with respect to a particular election made in a non-election year shall be considered to be made during the calendar year in which such election is held.

Our review of contributions revealed that in calendar year 1988, Raymond Kravis made contributions totaling $33,750, or $8,750 in excess of the annual limit.[1] Therefore, there is reason to believe that Raymond Kravis violated 2 U.S.C. § 441a(a)(3).

1. The information was obtained from the FEC's "D" index listing contributions of $500 or more.

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RAYMOND KRAVIS

LAST	FIRST	AMOUNT	P/G	YOE	DATE	CANDIDATE/CMTE
KRAVIS	RAYMOND	$750.00	P	88	12-AUG-1986	BUSH, GEORGE PRES
KRAVIS	RAYMOND	$1,000.00	P	88	16-MAR-1987	DU PONT, PETE PRES
KRAVIS	RAYMOND	$1,000.00	P	88	04-MAR-1987	KEMP, JACK FOR PRES
KRAVIS	RAYMOND	$1,000.00	P	88	29-MAY-1987	DOLE FOR PRES
KRAVIS	RAYMOND	($250.00)	G	88	17-AUG-1987	BUSH, G. PRES [COMPL.]
KRAVIS	RAYMOND	$500.00	P	88	04-MAR-1988	GEPHARDT FOR PRES
KRAVIS	RAYMOND	$750.00	P	88	04-MAR-1988	REP CONG BOOSTERS CL
KRAVIS	RAYMOND	$1,000.00	P	88	11-MAR-1988	METZENBAUM FR SEN'88
KRAVIS	RAYMOND	$1,000.00	G	88	11-MAR-1988	METZENBAUM FR SEN'88
KRAVIS	RAYMOND	$500.00	P	88	15-MAR-1988	INHOFF, JIM FR OF
KRAVIS	RAYMOND	$500.00	P	88	25-MAR-1988	JOHNSTON II HARRY A
KRAVIS	RAYMOND	$1,000.00	P	88	20-APR-1988	NRSC
KRAVIS	RAYMOND	$1,000.00	P	88	25-APR-1988	HEINZ, JOHN PEO FOR
KRAVIS	RAYMOND	$1,000.00	P	88	31-MAY-1988	NRSC
KRAVIS	RAYMOND	$1,000.00	P	88	31-MAY-1988	NRSC
KRAVIS	RAYMOND	$1,000.00	P	88	07-JUN-1988	MACK, CONNIE FR OF
KRAVIS	RAYMOND	$4,000.00	P	88	08-JUN-1988	NRSC
KRAVIS	RAYMOND	$1,000.00	P	88	09-JUN-1988	NRSC
KRAVIS	RAYMOND	$1,000.00	P	88	09-JUN-1988	NRSC
KRAVIS	RAYMOND	$1,000.00	P	88	09-JUN-1988	NRSC
KRAVIS	RAYMOND	$1,000.00	P	88	10-JUN-1988	DURENBERGER, US SEN
KRAVIS	RAYMOND	$1,000.00	P	88	13-JUN-1988	GORTON, SLADE FR OF
KRAVIS	RAYMOND	$1,000.00	G	88	14-JUN-1988	LUGAR, DICK FR OF
KRAVIS	RAYMOND	$1,000.00	P	88	15-JUN-1988	CHAFEE, SEN CMTE
KRAVIS	RAYMOND	$10,000.00	P	88	22-JUN-1988	RNC
	TOTAL	$33,750.00				

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 17, 1990

Mr. Ronald O. Perelman
36 East 63rd Street
New York, NY 10021

RE: MUR 3104
Ronald O. Perelman

Dear Mr. Perelman:

On August 3, 1990, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(3), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office and answer the following question within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath:

> List all contributions of any amount (including those less than $500.00) that you gave to any candidate for federal office in connection with the 1988 election cycle. This includes contributions made before and after 1988 that are attributable to the 1988 elections. Provide documentation for each of these contributions.

In the absence of any additional information demonstrating that no further action should be taken against you, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

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.

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Further, the Commission will not entertain requests for pre-probable cause conciliation 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 the General Counsel ordinarily will not give extensions beyond 20 days.

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

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 investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Frances B. Hagan, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,

Lee Ann Elliott

Lee Ann Elliott
Chairman

Enclosures
1. Factual and Legal Analysis
2. Contribution List
3. Procedures
4. Designation of Counsel Form

9304093332886

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Ronald O. Perelman MUR: 3104

Introduction

According to an article in the Los Angeles Times, certain individuals appear to have exceeded the 1988 annual contribution limit. Based on the L.A. Times allegations and at the Commission's direction, the Office of the General Counsel researched FEC indexes and disclosure reports to examine contributions by individuals who allegedly exceeded the annual contribution limits.

Excessive Contributions per Calendar Year

2 U.S.C. § 441a(a)(3) limits total contributions by an individual in any calendar year to $25,000. 11 C.F.R. § 110.5(c)(2) states that any contribution to a candidate or authorized committee with respect to a particular election made in a non-election year shall be considered to be made during the calendar year in which such election is held.

Our review of contributions revealed that in calendar year 1988, Ronald O. Perelman made contributions totaling $32,500, or $7,500 in excess of the annual limit.[1] Therefore, there is reason to believe that Ronald O. Perelman violated 2 U.S.C. § 441a(a)(3).

1. The information was obtained from the FEC's "D" index listing contributions of $500 or more.

9304093332887

RONALD PERELMAN

LAST	FIRST	AMOUNT	P/G	YOE	DATE	CANDIDATE/CMTE
PERELMAN	RONALD	$1,000.00	P	88	29-JAN-1987	MOYNIHAN CMTE INC
PERELMAN	RONALD	$1,000.00	G	88	29-JAN-1987	MOYNIHAN CMTE INC
PERELMAN	RONALD	$1,000.00	P	88	09-MAR-1987	GREEN, BILL CMTE FR
PERELMAN	RONALD	$1,000.00	P	88	07-APR-1987	LANTOS, TOM FR CONG
PERELMAN	RONALD	$1,000.00	P	88	06-MAY-1987	HART, FRIENDS OF GAR
PERELMAN	RONALD	$1,000.00	P	88	16-JUN-1987	METZENBAUM SEN'88
PERELMAN	RONALD	$1,000.00	P	88	25-JUN-1987	BIDEN FOR PRES
PERELMAN	RONALD	$1,000.00	P	88	17-AUG-1987	GIBBONS, SAM CMTE FO
PERELMAN	RONALD	$500.00	P	88	27-OCT-1987	BUSH, GEORGE FR PRES
PERELMAN	RONALD	$1,000.00	P	88	02-NOV-1987	GEPHARDT FOR PRES
PERELMAN	RONALD	$500.00	P	88	20-NOV-1987	DOLE FOR PRES
PERELMAN	RONALD	$1,000.00	P	88	09-FEB-1988	DAWKINS, PETE SEN
PERELMAN	RONALD	$500.00	G	88	09-FEB-1988	DAWKINS, PETE SEN
PERELMAN	RONALD	$1,000.00	P	88	22-APR-1988	ALBERT GORE PRES
PERELMAN	RONALD	$10,000.00	P	88	22-APR-1988	DSCC
PERELMAN	RONALD	$1,000.00	P	88	29-APR-1988	LICHT '88 COMMITTEE
PERELMAN	RONALD	$1,000.00	P	88	09-MAY-1988	RIEGLE FOR SENATE'88
PERELMAN	RONALD	$1,000.00	P	88	23-MAY-1988	MCCARTHY FR US SENAT
PERELMAN	RONALD	$1,000.00	G	88	27-JUN-1988	WILSON, CAL FOR PETE
PERELMAN	RONALD	$5,000.00	P	88	30-JUN-1988	RNC
PERELMAN	RONALD	$1,000.00	G	88	08-DEC-1988	DUKAKIS FR PRES [COMPL]
	TOTAL	$32,500.00				

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 17, 1990

Mr. Ira Riklis
1020 Park Avenue
New York, NY 10028

RE: MUR 3104
Ira Riklis

Dear Mr. Riklis:

On August 3, 1990, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(3), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office and answer the following question within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath:

> List all contributions of any amount (including those less than $500.00) that you gave to any candidate for federal office in connection with the 1988 election cycle. This includes contributions made before and after 1988 that are attributable to the 1988 elections. Provide documentation for each of these contributions.

In the absence of any additional information demonstrating that no further action should be taken against you, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

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.

93040933289

Further, the Commission will not entertain requests for pre-probable cause conciliation 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 the General Counsel ordinarily will not give extensions beyond 20 days.

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

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 investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Frances B. Hagan, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,

Lee Ann Elliott

Lee Ann Elliott
Chairman

Enclosures
1. Factual and Legal Analysis
2. Contribution List
3. Procedures
4. Designation of Counsel Form

9304093290

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Ira Riklis MUR: 3104

Introduction

According to an article in the Los Angeles Times, certain individuals appear to have exceeded the 1988 annual contribution limit. Based on the L.A. Times allegations and at the Commission's direction, the Office of the General Counsel researched FEC indexes and disclosure reports to examine contributions by individuals who allegedly exceeded the annual contribution limits.

Excessive Contributions per Calendar Year

2 U.S.C. § 441a(a)(3) limits total contributions by an individual in any calendar year to $25,000. 11 C.F.R. § 110.5(c)(2) states that any contribution to a candidate or authorized committee with respect to a particular election made in a non-election year shall be considered to be made during the calendar year in which such election is held.

Our review of contributions revealed that in calendar year 1988, Ira Riklis made contributions totaling $29,500, or $4,500 in excess of the annual limit.[1] Therefore, there is reason to believe that Ira Riklis violated 2 U.S.C. § 441a(a)(3).

1. The information was obtained from the FEC's "D" index listing contributions of $500 or more.

9304093329 1

IRA RIKLIS

LAST	FIRST	AMOUNT	P/G	YOE	DATE	CANDIDATE/CMTE
RIKLIS	IRA	$1,000.00	P	88	09-FEB-1987	DANFORTH FOR SENATE
RIKLIS	IRA	$1,000.00	P	88	24-FEB-1987	BIDEN FOR PRES
RIKLIS	IRA	$500.00	P	88	08-DEC-1987	BURDICK CAMP CMTE
RIKLIS	IRA	$5,000.00	P	88	25-FEB-1988	NATIONAL PAC
RIKLIS	IRA	$1,000.00	P	88	28-MAR-1988	HECHT REELECT
RIKLIS	IRA	$1,000.00	G	88	28-MAR-1988	HECHT REELECT
RIKLIS	IRA	$1,000.00	P	88	24-APR-1988	BUECHNER, JACK FR CO
RIKLIS	IRA	$1,000.00	G	88	24-APR-1988	BUECHNER, JACK FR CO
RIKLIS	IRA	$2,000.00	P	88	10-MAY-1988	ROUNDTABLE PAC
RIKLIS	IRA	$1,000.00	G	88	13-SEP-1988	LAUTENBERG CMTE
RIKLIS	IRA	$15,000.00	P	88	28-OCT-1988	RNC
	TOTAL	$29,500.00				

93040933292

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 17, 1990

Mr. Meshulam Riklis
Rapid American Corporation
725 Fifth Avenue
New York, NY 10022

RE: MUR 3104
Meshulam Riklis

Dear Mr. Riklis:

On August 3, 1990, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(3), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office and answer the following question within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath:

> List all contributions of any amount (including those less than $500.00) that you gave to any candidate for federal office in connection with the 1988 election cycle. This includes contributions made before and after 1988 that are attributable to the 1988 elections. Provide documentation for each of these contributions.

In the absence of any additional information demonstrating that no further action should be taken against you, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

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.

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Further, the Commission will not entertain requests for pre-probable cause conciliation 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 the General Counsel ordinarily will not give extensions beyond 20 days.

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

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 investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Frances B. Hagan, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,

Lee Ann Elliott

Lee Ann Elliott
Chairman

Enclosures
1. Factual and Legal Analysis
2. Contribution List
3. Procedures
4. Designation of Counsel Form

9304093294

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Meshulam Riklis MUR: 3104

Introduction

According to an article in the Los Angeles Times, certain individuals appear to have exceeded the 1988 annual contribution limit. Based on the L.A. Times allegations and at the Commission's direction, the Office of the General Counsel researched FEC indexes and disclosure reports to examine contributions by individuals who allegedly exceeded the annual contribution limits.

Excessive Contributions per Calendar Year

2 U.S.C. § 441a(a)(3) limits total contributions by an individual in any calendar year to $25,000. 11 C.F.R. § 110.5(c)(2) states that any contribution to a candidate or authorized committee with respect to a particular election made in a non-election year shall be considered to be made during the calendar year in which such election is held.

Our review of contributions revealed that in calendar year 1988, Meshulam Riklis made contributions totaling $26,000, or $1,000 in excess of the annual limit.[1] Therefore, there is reason to believe that Meshulam Riklis violated 2 U.S.C. § 441a(a)(3).

1. The information was obtained from the FEC's "D" index listing contributions of $500 or more.

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MESHULAM RIKLIS

LAST	FIRST	AMOUNT	P/G	YOE	DATE	CANDIDATE/CMTE
RIKLIS	MESHULAM	$1,000.00	P	88	09-FEB-1987	KENNEDY, SEN EDWARD
RIKLIS	MESHULAM	$1,000.00	G	88	09-FEB-1987	KENNEDY, SEN EDWARD
RIKLIS	MESHULAM	$1,000.00	P	88	24-MAR-1987	BIDEN FOR PRES
RIKLIS	MESHULAM	$20,000.00	P	88	23-FEB-1988	DSCC
RIKLIS	MESHULAM	$1,000.00	P	88	28-MAR-1988	HECHT REELECT
RIKLIS	MESHULAM	$1,000.00	G	88	28-MAR-1988	HECHT REELECT
RIKLIS	MESHULAM	$1,000.00	P	88	17-MAY-1988	BRYAN, FRDS FR BRYAN
	TOTAL	$26,000.00				

93040933296

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 17, 1990

Mr. Harold C. Simmons
5430 LBJ Freeway, Suite 1700
Dallas, Texas 75240

RE: MUR 3104
Harold C. Simmons

Dear Mr. Simmons:

On August 3, 1990, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. §§ 441a(a)(3) and 441a(a)(1)(C), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office and answer the following question within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath:

> List all contributions of any amount (including those less than $500.00) that you gave to any candidate for federal office in connection with the 1988 and 1989 election cycles. This includes contributions made before and after these years that are attributable to the 1988 and 1989 elections. Provide documentation for each of these contributions.

In the absence of any additional information demonstrating that no further action should be taken against you, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

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.

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Further, the Commission will not entertain requests for pre-probable cause conciliation 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 the General Counsel ordinarily will not give extensions beyond 20 days.

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

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 investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Frances B. Hagan, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,

Lee Ann Elliott

Lee Ann Elliott
Chairman

Enclosures
1. Factual and Legal Analysis
2. Contribution List
3. Procedures
4. Designation of Counsel Form

9304093298

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Harold C. Simmons MUR: 3104

According to an article in the Los Angeles Times, certain individuals appear to have exceeded the 1988 annual contribution limit. Based on the L.A. Times allegations and at the Commission's direction, the Office of the General Counsel researched FEC indexes and disclosure reports to examine contributions by individuals who allegedly exceeded the annual contribution limits.

Excessive Contributions per Calendar Year

2 U.S.C. § 441a(a)(3) limits total contributions by an individual in any calendar year to $25,000. 11 C.F.R. § 110.5(c)(2) states that any contribution to a candidate or authorized committee with respect to a particular election made in a non-election year shall be considered to be made during the calendar year in which such election is held.

Our review of contributions revealed that in calendar year 1988, Harold C. Simmons made contributions totaling $64,626, or $39,626 in excess of the annual limit. In addition, Mr. Simmons made contributions of $26,250 in 1989, thereby apparently exceeding the 1989 annual limit by $1,250.[1]

Excessive Contributions to a Committee

2 U.S.C. § 441a(a)(1)(C) limits individual contributions to

1. The information was obtained from the FEC's "D" index listing contributions of $500 or more.

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political committees (other than candidate committees and party committees) to $5,000 per calendar year.

Our review of annual contributions revealed an apparent excessive contribution to a committee, as follows:

Harold C. Simmons

Recipient Committee	Amount	Date of Contribution	Amount of Excessive
Conservatives Acting for Texans PAC	$5,000	2/18/88	
	$5,000	8/12/88	$5,000

Therefore, there is reason to believe that Harold C. Simmons violated 2 U.S.C. § 441a(a)(3) and § 441a(a)(1)(C).

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HAROLD SIMMONS

LAST	FIRST	AMOUNT	P/G	YOE	DATE	CANDIDATE/CMTE
SIMMONS	HAROLD	$1,000.00	P	88	30-MAR-1987	BENTSEN, SEN LLOYD
SIMMONS	HAROLD	$1,000.00	P	88	01-APR-1987	DU PONT/PRES
SIMMONS	HAROLD	$1,000.00	P	88	17-APR-1987	DOLE/PRES
SIMMONS	HAROLD	$1,000.00	P	88	21-APR-1987	HATCH ELECT CMTE
SIMMONS	HAROLD	$1,000.00	G	88	21-APR-1987	HATCH ELECT CMTE
SIMMONS	HAROLD	$1,000.00	P	88	22-APR-1987	BARTON, CONGMAN JOE
SIMMONS	HAROLD	$5,000.00	P	88	23-APR-1987	WTW REELECT CMT [JT F/R]
SIMMONS	HAROLD	$1,000.00	P	88	24-APR-1987	HECHT REELECT CMTE
SIMMONS	HAROLD	$1,000.00	G	88	24-APR-1987	HECHT REELECT CMTE
SIMMONS	HAROLD	$1,000.00	P	88	22-MAY-1987	ARMEY, FR OF DICK
SIMMONS	HAROLD	$1,000.00	G	88	22-MAY-1987	ARMEY, FR OF DICK
SIMMONS	HAROLD	$500.00	P	88	26-MAY-1987	ORTIZ FR CONG
SIMMONS	HAROLD	$500.00	P	88	09-JUN-1987	MCEWEN '88
SIMMONS	HAROLD	($250.00)	P	88	30-JUN-1987	DOLE/PRES
SIMMONS	HAROLD	$1,000.00	P	88	01-OCT-1987	BOULTER, BEAU TX FOR
SIMMONS	HAROLD	$500.00	P	88	20-OCT-1987	BUSH, GEORGE PRES
SIMMONS	HAROLD	($1,000.00)	P	88	22-OCT-1987	HATCH ELECT CMTE
SIMMONS	HAROLD	$875.00	P	88	26-OCT-1987	BARTLETT, STEVE CONG
SIMMONS	HAROLD	$1,000.00	P	88	27-OCT-1987	KARNES, FR OF SEN DA
SIMMONS	HAROLD	($833.00)	P	88	19-NOV-1987	TRIBLE, FR OF PAUL
SIMMONS	HAROLD	$1,000.00	P	88	20-JAN-1988	LUGAR, FR OF DICK
SIMMONS	HAROLD	$1,000.00	G	88	20-JAN-1988	LUGAR, FR OF DICK
SIMMONS	HAROLD	$2,000.00	P	88	26-JAN-1988	NRSC
SIMMONS	HAROLD	$1,000.00	G	88	29-JAN-1988	BARTLETT, STEVE CONG
SIMMONS	HAROLD	$1,000.00	P	88	29-JAN-1988	DINGELL, JOHN FR CON
SIMMONS	HAROLD	$1,000.00	P	88	03-FEB-1988	MARKEY FR CONG
SIMMONS	HAROLD	$1,000.00	P	88	08-FEB-1988	DAWKINS, PETE FR SEN
SIMMONS	HAROLD	$500.00	P	88	11-FEB-1988	DANFORTH FR SEN
SIMMONS	HAROLD	$1,000.00	P	88	16-FEB-1988	GORE, ALBERT PRES
SIMMONS	HAROLD	$5,000.00	P	88	18-FEB-1988	CONSERV ACTNG FOR TX
SIMMONS	HAROLD	($166.00)	P	88	18-FEB-1988	TRIBLE, FR OF PAUL
SIMMONS	HAROLD	$1,000.00	P	88	22-FEB-1988	VOINOVICH FR OF
SIMMONS	HAROLD	$1,000.00	P	88	07-MAR-1988	MONTOYA FR US SEN CM
SIMMONS	HAROLD	$1,000.00	R	88	28-MAR-1988	BOULTER, TEXAN FR BE
SIMMONS	HAROLD	$5,000.00	P	88	28-MAR-1988	KIRKLAND & ELLIS PAC
SIMMONS	HAROLD	$1,000.00	G	88	29-APR-1988	MICHEL FOR CONG
SIMMONS	HAROLD	$1,000.00	P	88	10-MAY-1988	HAIG FOR PRES
SIMMONS	HAROLD	$2,000.00	P	88	31-MAY-1988	JEFFORDS-MACK VIC CM
SIMMONS	HAROLD	$1,000.00	G	88	31-MAY-1988	SMITH, FR OF DENNY
SIMMONS	HAROLD	$500.00	G	88	02-JUN-1988	BUSH, G. PRES [COMPL.]
SIMMONS	HAROLD	$500.00	P	88	28-JUN-1988	SYNAR, MIKE FR CONG
SIMMONS	HAROLD	$5,000.00	P	88	30-JUN-1988	CONSERV VICTORY CMTE
SIMMONS	HAROLD	$500.00	G	88	30-JUN-1988	WILLIAMS CONG 88
SIMMONS	HAROLD	$1,000.00	G	88	30-JUN-1988	WILSON, CAL FOR PETE
SIMMONS	HAROLD	$1,000.00	G	88	13-JUL-1988	BARTON, CONG JOE
SIMMONS	HAROLD	$1,000.00	P	88	18-JUL-1988	GORTON, FR OF SLADE
SIMMONS	HAROLD	$1,000.00	G	88	22-JUL-1988	HEINZ, PEOPLE FR JOH
SIMMONS	HAROLD	$5,000.00	P	88	12-AUG-1988	CONSERV ACT FR TEXAN
SIMMONS	HAROLD	$1,000.00	G	88	30-SEP-1988	BRYANT,JOHN CAMP CMT
SIMMONS	HAROLD	$500.00	G	88	25-DEC-1988	DAWKINS, PETE FR SEN
SIMMONS	HAROLD	$1,000.00	G	88	11-JAN-1989	KARNES,FRIENDS OF DA
SIMMONS	HAROLD	$1,000.00	P	88	19-MAY-1989	SMITH,FRIENDS OF DEN
SIMMONS	HAROLD	$1,000.00	G	88	20-JUN-1989	MACK,FRIENDS OF CONN
	TOTAL	$64,626.00				

LAST	FIRST	AMOUNT	P/G	YOE	DATE	CANDIDATE/CMTE
SIMMONS	HAROLD	$250.00	P	89	08-FEB-1989	TEXAS REP CONGR. CMT
SIMMONS	HAROLD	$1,000.00	P	89	17-APR-1989	NAT'L REP SEN CMT
SIMMONS	HAROLD	$15,000.00	p	89	06-JUN-1989	DSCC
SIMMONS	HAROLD	$5,000.00	P	89	14-NOV-1989	CONTRAN PAC
SIMMONS	HAROLD	$5,000.00	P	89	17-NOV-1989	SMALLBUSINESS PAC
	TOTAL	$26,250.00				

93040933302

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 17, 1990

Mr. Donald J. Trump
725 Fifth Avenue
New York, NY 10022

RE: MUR 3104
Donald J. Trump

Dear Mr. Trump:

On August 3, 1990, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(3), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office and answer the following question within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath:

> List all contributions of any amount (including those less than $500.00) that you gave to any candidate for federal office in connection with the 1988 election cycle. This includes contributions made before and after 1988 that are attributable to the 1988 elections. Provide documentation for each of these contributions.

In the absence of any additional information demonstrating that no further action should be taken against you, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

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.

9304093303

Further, the Commission will not entertain requests for pre-probable cause conciliation 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 the General Counsel ordinarily will not give extensions beyond 20 days.

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

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 investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Frances B. Hagan, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,

Lee Ann Elliott

Lee Ann Elliott
Chairman

Enclosures
1. Factual and Legal Analysis
2. Contribution List
3. Procedures
4. Designation of Counsel Form

9304093304

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Donald J. Trump MUR: 3104

Introduction

According to an article in the Los Angeles Times, certain individuals appear to have exceeded the 1988 annual contribution limit. Based on the L.A. Times allegations and at the Commission's direction, the Office of the General Counsel researched FEC indexes and disclosure reports to examine contributions by individuals who allegedly exceeded the annual contribution limits.

Excessive Contributions per Calendar Year

2 U.S.C. § 441a(a)(3) limits total contributions by an individual in any calendar year to $25,000. 11 C.F.R. § 110.5(c)(2) states that any contribution to a candidate or authorized committee with respect to a particular election made in a non-election year shall be considered to be made during the calendar year in which such election is held.

Our review of contributions revealed that in calendar year 1988, Donald J. Trump made contributions totaling $46,800, or $21,800 in excess of the annual limit.[1] Therefore, there is reason to believe that Donald J. Trump violated 2 U.S.C. § 441a(a)(3).

1. The information was obtained from the FEC's "D" index listing contributions of $500 or more.

9304093305

DONALD TRUMP

LAST	FIRST		AMOUNT	P/G	YOE	DATE	CANDIDATE/CMTE
TRUMP	DONALD		$1,000.00	P	88	23-JAN-1985	CRANSTON FOR PRESIDE
TRUMP	DONALD		$1,000.00	P	88	10-JUN-1987	GREEN, BILL CONG
TRUMP	DONALD		$1,000.00	P	88	11-JUN-1987	RANGEL FOR CONGRESS
TRUMP	DONALD		$1,000.00	P	88	18-JUN-1987	DANFORTH FOR SENATE
TRUMP	DONALD		$500.00	P	88	04-AUG-1987	RIEGLE FOR SEN '88 C
TRUMP	DONALD		$1,000.00	P	88	06-AUG-1987	WEIKER '88 CMTE
TRUMP	DONALD		$1,000.00	P	88	11-AUG-1987	SIMON,P. FOR PRES
TRUMP	DONALD		$1,000.00	P	88	24-AUG-1987	GORE,A.,JR. FOR PRES
TRUMP	DONALD		$1,000.00	P	88	25-AUG-1987	HECHT REELECT
TRUMP	DONALD		$1,000.00	P	88	28-AUG-1987	DOLE FOR PRES CMT IN
TRUMP	DONALD		$1,000.00	P	88	01-SEP-1987	WEISS, TED FR CONGRE
TRUMP	DONALD		$1,000.00	P	88	15-SEP-1987	KEMP, JACK FR PRESID
TRUMP	DONALD		$1,000.00	P	88	05-OCT-1987	BABBITT FOR PRES
TRUMP	DONALD		$1,000.00	P	88	19-OCT-1987	WALLOP SENATE DRIVE
TRUMP	DONALD		$500.00	P	88	02-NOV-1987	BURDICK CAMP CMTE
TRUMP	DONALD		$500.00	P	88	02-NOV-1987	FLAKE, CONG FLOYD H
TRUMP	DONALD		$1,000.00	G	88	13-NOV-1987	RANGEL FOR CONGRESS
TRUMP	DONALD		$500.00	P	88	16-NOV-1987	FLAKE, CONG FLOYD H
TRUMP	DONALD		$1,000.00	G	88	25-NOV-1987	DANFORTH FOR SEN
TRUMP	DONALD		$1,000.00	P	88	08-DEC-1987	KENNEDY, CIT. FOR [JOE]
TRUMP	DONALD		$10,000.00	P	88	25-JAN-1988	REP NAT'L CMT
TRUMP	DONALD		$1,000.00	P	88	05-FEB-1988	WILSON,CAL.FOR PETE'
TRUMP	DONALD		$1,000.00	G	88	16-FEB-1988	WEICKER '88 CMT
TRUMP	DONALD		$1,000.00	G	88	22-MAR-1988	MOYNIHAN CMTE
TRUMP	DONALD		$1,000.00	P	88	24-MAR-1988	HATCH ELEC CMT
TRUMP	DONALD	#1	$15,000.00	P	88	24-MAR-1988	DCCC
TRUMP	DONALD		$1,000.00	P	88	30-MAR-1988	KARNES,SEN DAVID FR
TRUMP	DONALD		$1,000.00	P	88	04-MAR-1988	GEPHARDT FOR PRES
TRUMP	DONALD		$800.00	P	88	08-APR-1988	BROOKLYNN DEM FED CAMP
TRUMP	DONALD		$1,000.00	P	88	15-APR-1988	BUSH,G. FR PRE.COMPLIA
TRUMP	DONALD		$1,000.00	P	88	24-MAY-1988	MCCARTHY FOR SEN
TRUMP	DONALD		$1,000.00	G	88	26-MAY-1988	HEINZ, JOHN PEOPLE C
TRUMP	DONALD		$1,000.00	P	88	31-MAY-1988	DIOGUARDI, PEOPLE FO
TRUMP	DONALD		$1,000.00	P	88	02-JUN-1988	COURTER FOR CONGRESS
TRUMP	DONALD		$1,000.00	P	88	24-JUN-1988	MACK,CONNIE,FRIENDS OF
TRUMP	DONALD		$10,000.00	P	88	06-JUL-1988	REP NAT'L CMT
TRUMP	DONALD		$1,000.00	P	88	04-AUG-1988	DOUGLAS, CHUCK FR CO
TRUMP	DONALD		$1,000.00	P	88	30-AUG-1988	BRYAN, FRIENDS FOR
TRUMP	DONALD		$1,000.00	G	88	12-OCT-1988	FLORIO, '88 CMT
TRUMP	DONALD		$500.00	G	88	21-OCT-1988	SCHNEIDER, CLAUDINE
TRUMP	DONALD		$1,000.00	G	88	13-NOV-1988	DAWKINS,PETE FOR SEN
TRUMP	DONALD		$500.00	G	88	13-DEC-1988	JOHNSTON,II TO CONGR
TRUMP	DONALD		($10,000.00)	P	88	21-DEC-1988	REP NAT'L CMT
TRUMP	DONALD		($15,000.00)	P	88	30-DEC-1988	DCCC
TRUMP	DONALD		$1,000.00	G	88	02-NOV-1989	LAUTENBERG CMT
	TOTAL		$46,800.00				

OGC 7654

MANATT, PHELPS, ROTHENBERG & PHILLIPS
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
ATTORNEYS AT LAW

1200 NEW HAMPSHIRE AVENUE, N.W.
SUITE 200
WASHINGTON, D.C. 20036

TELEPHONE (202) 463-4300
FAX (202) 463-4394
(202) 463-4395

LOS ANGELES
11355 WEST OLYMPIC BOULEVARD
LOS ANGELES, CALIFORNIA 90064
(213) 312-4000

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 AUG 29 PM 4:14

August 28, 1990

Fran Hagan
Office of the General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 3104, Ira Riklis

Dear Fran:

As we discussed by telephone, we represent Ira Riklis in the above-captioned MUR. Enclosed for your records is a Designation of Counsel Statement signed by our client. Due to previously scheduled travel commitments, we are hereby requesting an extension of fifteen days to respond, until September 20, 1990.

Your consideration of this request is appreciated.

Sincerely,

Eric

Eric F. Kleinfeld
Manatt, Phelps & Phillips

Enclosure

93040093307

STATEMENT OF DESIGNATION OF COUNSEL

MUR 3104

NAME OF COUNSEL: William C. Oldaker
Eric F. Kleinfeld

ADDRESS: Manatt, Phelps & Phillips
1200 New Hampshire Ave., NW
Suite 200
Washington, DC 20036

TELEPHONE: (202) 463-4300

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.

8/23/90
Date

Signature

RESPONDENT'S NAME: Ira Riklis

ADDRESS: 1020 Park Avenue
New York, NY 10026

HOME PHONE:

BUSINESS PHONE: (212) 735-9493

9304093308

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 31, 1990

William C. Oldaker, Esquire
Eric F. Kleinfeld, Esquire
Manatt, Phelps & Phillips
1200 New Hampshire Ave., N.W.
Washington, D.C. 20036

RE: MUR 3104
Ira Riklis

Dear Mr. Oldaker and Mr. Kleinfeld:

This is in response to your letter dated August 28, 1990, which we received on August 29, 1990, requesting an extension until September 20, 1990, to respond to the Commission's finding of reason to believe against your client. After considering the circumstances presented in your letter, I have granted the requested extension. Accordingly, your response is due by the close of business on September 20, 1990.

If you have any questions, please contact Frances B. Hagan, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lisa E. Klein
Assistant General Counsel

9304093309

0C7679
RECEIVED
FEDERAL ELECTION COMM
SECRETARIAT
90 AUG 30 PM 3:15

HERGE, SPARKS, CHRISTOPHER & BIONDI
ATTORNEYS AT LAW
SUITE 200
8201 GREENSBORO DRIVE
MCLEAN, VIRGINIA 22102
(703) 848-4700

J. CURTIS HERGE
ROBERT R. SPARKS, JR.
A. MARK CHRISTOPHER
GEORGE V. SIONDI
DONNA LYNN MILLER
DIANE H. MAHSHIE

TELECOPIER NUMBER
(703) 893-7371

August 29, 1990

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 AUG 30 PM 4:31

The Honorable Lee Ann Elliott,
Chairman
Federal Election Commission
999 K Street, N.W.
Washington, D. C. 20463

Attention: Frances B. Hagan
Office of General Counsel

Re: MUR 3104

Dear Madam Chairman:

This letter is written with reference to your letter to Mr. Donald J. Trump, dated August 17, 1990, in which you reported that the Federal Election Commission had found reason to believe that Mr. Trump may have violated the provisions of 2 U.S.C. § 441a(a)(3).

Mr. Trump has designated me as his counsel in connection with this matter, which has been designated as MUR 3104. A copy of the Statement of Designation of Counsel, which was telecopied to me today, is enclosed.

To permit me an opportunity to gather and analyze the relevant facts, and prepare a substantive response, I respectfully request an extension until September 21, 1990 within which to reply.

Sincerely yours,

J. Curtis Herge

:sbl

Enclosure

93040933310

STATEMENT OF DESIGNATION OF COUNSEL

MUR 3104

NAME OF COUNSEL: J. Curtis Herge

ADDRESS: Herge, Parks, Christopher & Biondi
Suite 200, 8201 Greensboro Drive
McLean, Virginia 22102

TELEPHONE: (703) 848-4700

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.

8/26/90
Date

Signature

RESPONDENT'S NAME: Donald J. Trump

ADDRESS: The Trump Organization
725 Fifth Avenue
New York, New York 10022

HOME PHONE:

BUSINESS PHONE: (212) 832-2000

9304093311

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 31, 1990

J. Curtis Herge, Esquire
Herge, Sparks, Christopher & Biondi
8201 Greensboro Drive, Suite 200
McLean, Virginia 22102

RE: MUR 3104
Donald J. Trump

Dear Mr. Herge:

This is in response to your letter dated August 29, 1990, which we received on August 30, 1990, requesting an extension until September 21, 1990, to respond to the Commission's finding of reason to believe against your client. After considering the circumstances presented in your letter, I have granted the requested extension. Accordingly, your response is due by the close of business on September 21, 1990.

If you have any questions, please contact Frances B. Hagan, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lisa E. Klein
Assistant General Counsel

9304093312

00C7676

SKADDEN, ARPS, SLATE, MEAGHER & FLOM

1440 NEW YORK AVENUE, N.W
WASHINGTON, D.C. 20005-2107

(202) 371-7000

FAX (202) 393-5760

DIRECT DIAL
(202) 371-

BOSTON
BRUSSELS
CHICAGO
HONG KONG
LONDON
LOS ANGELES
NEW YORK
SAN FRANCISCO
SYDNEY
TOKYO
TORONTO
WILMINGTON

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 AUG 30 PM 3:52

August 30, 1990

Lawrence Noble, Esq.
General Counsel
Federal Election Commission
999 E Street, Northwest
Washington, D.C. 20463

Re: MUR 3104

Dear Mr. Noble:

Enclosed please find Ronald O. Perleman's Statement of Designation of Counsel in the above referenced matter. We will need an extension of time of 20 days to respond in this matter so that we may review information relating to the contributions identified in the initial finding.

Thank you for your consideration of this request.

Sincerely,

Kenneth A. Gross

Kenneth A. Gross

Enclosure

9304093313

STATEMENT OF DESIGNATION OF COUNSEL

MUR 3104

NAME OF COUNSEL: Kenneth A. Gross

ADDRESS: Skadden, Arps, Slate, Meagher & Flom
1440 New York Ave., N.W.
Washington, D.C. 20005-2107

TELEPHONE: (202) 371-7007

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.

August 24, 1990
Date

Signature

RESPONDENT'S NAME: Ronald O. Perelman

ADDRESS: 36 East 63rd Street
New York, NY 10021

HOME PHONE: (212) 688-9000

BUSINESS PHONE: (212) 572-5050

9304093314

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 31, 1990

Kenneth A. Gross, Esquire
Skadden, Arps, Slate, Meagher & Flom
1440 New York Ave., N.W.
Washington, D.C. 20005-2107

RE: MUR 3104
Ronald O. Perelman

Dear Mr. Gross:

This is in response to your letter dated August 30, 1990, which we received that day, requesting an extension of 20 days to respond to the Commission's finding of reason to believe against your client. After considering the circumstances presented in your letter, I have granted the requested extension. Accordingly, your response is due by the close of business on September 24, 1990.

If you have any questions, please contact Frances B. Hagan, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lisa E. Klein
Assistant General Counsel

9304093315

OGC 7664

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT

90 AUG 29 PM 4:20

STATEMENT OF DESIGNATION OF COUNSEL

MUR 3104 - Harold C. Simmons

NAME OF COUNSEL: Mr. William S. Singer

ADDRESS: KIRKLAND & ELLIS
200 East Randolph Drive
Chicago, Illinois 60601

TELEPHONE: 312/861-2000

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 AUG 30 PM 12:34

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.

8/27/90
Date

Harold Simmons
Signature

RESPONDENT'S NAME: Harold C. Simmons

ADDRESS: 5430 LBJ Freeway, Suite 1700
Dallas, Tx. 75240-2697

HOME PHONE:

BUSINESS PHONE: 214/233-1700

9304093316

OGC 7702

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

M. RIKLIS
TRUMP TOWER
725 FIFTH AVENUE
NEW YORK, N.Y. 10022

90 AUG 31 AM 11:42

(212) 735-9501

August 29, 1990

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 AUG 31 PM 3:12

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

RE: MUR 3104
Meshulam Riklis

Dear Sir:

The following is submitted in response to your letter of August 17, 1990:

(1) The contribution list enclosed with your letter agrees with our records and constitutes all of the contributions that I made in connection with the Federal Elections which you advise are attributable to the 1988 "election cycle".

(2) However, please note that the contributions were made over two calendar years as follows:

	1987		
FEB 09	$1,000	Sen. Edward Kennedy	(Primary)
FEB 09	1,000	Sen. Edward Kennedy	(General)
MAR 24	1,000	Biden For President	(Primary)
TOTAL	$3,000		
	1988		
FEB 23	$20,000	DSCC	
MAR 28	1,000	Hecht Re-elect	(Primary)
MAR 28	1,000	Hecht Re-elect	(General)
MAY 17	1,000	Friends For Bryan	(Primary)
TOTAL	$23,000		

Thus, there were no contributions made in excess of $25,000 in calendar year 1987, calendar year 1988, or any other calendar year. As indicated in your reference to U.S.C. Section 441 (a) (3), total contributions by any individual for any calendar year is limited to $25,000. Accordingly, I believe I have complied with the foregoing.

9304093317

M. RIKLIS
TRUMP TOWER
725 FIFTH AVENUE
NEW YORK, N. Y. 10022

(212) 735-9501

(3) The factual and legal analysis indicates that contributions are attributable to the calendar year in which the election takes place, rather than the calendar year in which the contribution was made. However, please note that Senator Biden had withdrawn his candidacy from the election prior to December 31, 1987 and we therefore concluded that the contribution to Senator Biden should be attributable to calendar year 1987. Thus, based on this conclusion, the contributions made were not in violation of the Federal Elections laws.

In summary, my staff and I do not believe that the Federal Elections laws were violated. If any violation occured, it was inadvertent and highly technical. Since I have always endeavored to comply with the law, I would like to clear this matter up as quickly as possible. Accordingly, I am requesting pre-probable cause conciliation.

I request that any further communication be had directly with my counsel, Gerald Harris of the firm Rubin Baum Levin Constant & Friedman, 30 Rockefeller Plaza, New York, NY, 10019.

Sincerely,

Meshulam Riklis

MR/SCG/aaa
ENCLOSURES

CC: Frances B. Hagan
Federal Election Commission

CC: Gerald Harris
Rubin Baum Levin Constant & Friedman

9304093318

STATEMENT OF DESIGNATION OF COUNSEL

MUR 3104

NAME OF COUNSEL: Gerald Harris, Esq.

ADDRESS: Rubin Baum Levin Constant & Friedman
30 Rockefeller Plaza
New York, NY 10019

TELEPHONE: (212) 698-7800

Direct Line: (212) 698-7777

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.

8/30/90
Date

Signature

RESPONDENT'S NAME: Meshulam Riklis

ADDRESS: 725 Fifth Avenue
New York, NY 10022

HOME PHONE: (212) 751-3633

BUSINESS PHONE: (212) 735-9501

9304093319

06C7703

LAW OFFICES
WUNDER, RYAN, CANNON & THELEN
1615 L STREET, N.W., SUITE 650
WASHINGTON, D. C. 20036
(202) 659-3005
FACSIMILE: (202) 659-3010

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT
90 SEP -3 AM 11:10

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 SEP -5 AM 10:07

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 AUG 36 AM 10:04

93040933320

August 30, 1990

Lawrence M. Noble, Esq.
General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, DC 20463

Attn: Francis B. Hagan

RE: MUR 3104 - Henry Kravis and Raymond Kravis

Dear Mr. Noble:

Please find enclosed the designation of counsel statements for Mr. Henry Kravis and Mr. Raymond Kravis.

I have reviewed your correspondence which was received by the aforementioned respondent's on August 23, 1990. It appears you have requested a listing of contributions made by those individuals relative to the 1988 election cycle. In order to obtain the necessary documentation, review the documentation and to submit a response. It will require time greater than the allotted fifteen (15) days. Therefore, I am hereby requesting that the Federal Election Commission grant a fifteen (15) day extension in which to submit our response. By our calculations, the responses will be to your office no later than September 21, 1990.

Thank you for your attention to this matter.

Very truly yours,

Paul E. Sullivan

cc: Ken Levine

STATEMENT OF DESIGNATION OF COUNSEL

MUR 3104

NAME OF COUNSEL: Kenneth S. Levine and Paul E. Sullivan

ADDRESS: Wunder, Ryan, Cannon & Thelen
1615 L Street, NW, Suite 650
Washington, DC 20036

TELEPHONE: 202/659-3005

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.

8/30/20
Date

Signature

RESPONDENT'S NAME: Henry R. Kravis

ADDRESS: 71 East 71st Street
New York, NY 10021

HOME PHONE:

BUSINESS PHONE: 212/230-9403

93040933321

STATEMENT OF DESIGNATION OF COUNSEL

MUR 3104

NAME OF COUNSEL: Kenneth S. Levine and Paul E. Sullivan

ADDRESS: WUNDER, RYAN, CANNON AND THELEN
1615 "L" Street, N.W.
Suite 650
Washington, DC 20036

TELEPHONE: (202) 659-3005

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.

8/24/90
Date

Raymond F. Kravis
Signature

RESPONDENT'S NAME: Raymond F. Kravis

ADDRESS: 1804 First National Bldg.
Tulsa, OK 74103

HOME PHONE: 918-742-3294

BUSINESS PHONE: 918-587-5161

9304093322

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 12, 1990

Kenneth S. Levine, Esquire
Paul E. Sullivan, Esquire
Wunder, Ryan, Cannon & Thelen
1615 L Street, N.W., Suite 650
Washington, D.C. 20036

RE: MUR 3104
Henry R. Kravis
Raymond Kravis

Dear Mr. Levine and Mr. Sullivan:

This is in response to your letter dated August 30, 1990, which we received on September 5, 1990, requesting an extension until September 21, 1990, to respond to the Commission's findings of reason to believe against your clients. After considering the circumstances presented in your letter, I have granted the requested extension. Accordingly, your response is due by the close of business on September 21, 1990.

If you have any questions, please contact Frances B. Hagan, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lisa E. Klein
Assistant General Counsel

9304093323

OGC 7754

Processors of agricultural products

ADM

ARCHER DANIELS MIDLAND COMPANY BOX 1470 DECATUR, ILLINOIS 62525 TELEPHONE: 217/424-5515

DWAYNE O. ANDREAS
CHAIRMAN OF THE BOARD
AND CHIEF EXECUTIVE

August 29, 1990

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 SEP -5 AM 11:43

Ms. Lee Ann Elliott
Chairman
Federal Election Commission
Washington, D.C. 20463

9304093324

Dear Ms. Elliott:

This is in regard to MUR 3104 and your letter dated August 17. We have gone over our records and find that your listing of my campaign contributions for 1987 and 1988 are correct.

For a number of years, we have carefully monitored our annual contributions, believing that we were totally within the law by staying within $25,000 per calendar year. I am particularly surprised because, during that time, I can recall conversations with two lawyers and several professional fund raisers who all seemed to believe the same thing. Since I did not pay for a legal opinion, I certainly cannot fall back on that. Since the Times report came out, we have asked several fund raisers, two more lawyers, and three Senators and have not yet found anyone who seemed to know about the per-election interpretation.

My Administrative Assistant, Mrs. Claudia Madding, had the responsibility for staying within these limits. She kept very clear records, and we were extremely careful not to exceed that annual limit or other limits.

It was not until we read the story in the Los Angeles Times that the limit was cut in half by applying the contributions to the year of the election, no matter when they were made.

Of course, I am old enough to know that ignorance of the law is no excuse, and I would like to know if you have any suggestions as to how I can rectify this error.

We have made no contributions since the L. A. Times story came to our attention. If we continue that policy, our three years' average will soon be below the limit as we now understand it. Could this rectify our error?

Another suggestion. I could ask the candidates if my contribution was used in 1988 or to pay a 1986 debt; or if it was left over and used for the 1990 campaign.

For example, the $5000.00 given to the PAC very likely was not spent in the 1988 campaign. I have learned that the PAC I gave to had a balance of $138,367.86 on December 31, 1987. I gave $5,000.00 on April 2, 1988, but on December 31, 1988 it had a balance of $173,294.38. This could be interpreted to indicate that my $5,000.00 was not spent on a 1988 campaign.

Similarly, the $5000.00 given to the RNC could very well have still been there after the '88 campaign was over. This could also be true of other campaign funds. But I am hesitant to inquire of all of them unless you think the information is relevant.

In any case, it would be difficult, if not impossible, to prove that my $5,000.00 to the PAC was spent on the 1988 campaign.

If I were to uncover the fact that much of this money was not used in '88, could I in that way come within your parameters, or do you have any other suggestions?

In any event, conciliation would appear to be appropriate to resolve this matter.

Sincerely,

Dwayne Andreas

Dwayne O. Andreas

DOA:ji

9304093325

[illegible] 7752

RECEIVED
FEDERAL ELECTION COMMISSION
90 SEP -4 PM 3:53

MRS. [illegible] O. ANDREAS

Decatur, Ill.
Sept. 30, 1990

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 SEP -5 AM 11:43

Dear Madame Chairmen;

Regarding your letter of 'August 17th MUR 3104'. As far as I know the information is correct, except, that I did not give two checks to Jesse Jackson. I think that my $1000.00 check was enclosed with another Pac check for $1000 and mistakenly reported by The Jackson Committee.

I read my husbands letter and wish to reiterate what he said.

9304093333326

MRS. O. ANDREAS

I think it is quite likely that my contributions to

Michael for Congress - 1000
Campaign America - 5000
Republican Natl Com - 1000
Tom Lehman - 1000
Wittglit Appreciation - 1000
Sen. Floyd Bentsen - 1000

were not used in the 1988 campaign but I do not have proof at this time. If this were shown to be correct; I would be way under my limit.

I have not contributed any money since the L.A. Times article appeared; because I was afraid they might be applied to a 1988 debt, which would make my error greater.

93040933327

MRS. D. O. ANDREAS

I do believe that conciliation is the appropriate way to resolve this problem.

Yours Sincerely

Mrs DO Andreas

930409333328

HAND DELIVERED

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

90 SEP -5 AM 11:55

100 Crescent Court
Suite 1700
Dallas, Texas 75201
(214) 871-8400

FAX # 202/376-5280

September 4, 1990

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 SEP -5 PM 3:43

General Counsel's Office
Federal Election Commission
Washington D. C. 20463

Attention: Ms. Frances B. Hagan

Re: MUR 3104
Caroline Rose Hunt

Dear Ms. Hagan:

This will confirm our telephone call last Thursday, August 30, 1990, at which time I advised you that I represented Caroline Rose Hunt in connection with the above-referenced matter. You told me that you could not discuss the matter in detail until your office had received Ms. Hunt's Statement of Designation of Counsel. Because Ms. Hunt was out of town from August 22, 1990, the day of receipt of the Commission's letter dated August 17, 1990, until today, and you were going to be out of town today and the rest of this week, you suggested I file for an extension (by fax being acceptable) so that we could discuss the matter on Monday, September 10.

Accordingly, enclosed is a Statement of Designation of Counsel designating the undersigned to represent Ms. Hunt in this matter. The undersigned requests an extension of time until September 17, 1990 to file Ms. Hunt's answer to the Commission's letter due to Ms. Hunt's unavailability to sign the Designation until today, and your unavailability to discuss the matter this week.

Please let me know immediately if there is a problem with an extension so that if the request is denied, a timely response can be made. My telephone number is (214) 871-8428. Otherwise, I look forward to talking to you on Monday, September 10.

Very truly yours,

C. Jedson Nau

C. Jedson Nau
Attorney

9304093329

STATEMENT OF DESIGNATION OF COUNSEL

MUR 3104

NAME OF COUNSEL: C. Jedson Nau

ADDRESS: 100 Crescent Court
Suite 1700
Dallas, Texas 75201

TELEPHONE: (214) 871-8400

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.

9-4-90
Date

Caroline Rose Hunt
Signature

RESPONDENT'S NAME: Caroline Rose Hunt

ADDRESS: 100 Crescent Court
Suite 1700
Dallas, Texas 75201

HOME PHONE: (214)871-3200

BUSINESS PHONE: (214)871-8400

2304093330

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 12, 1990

C. Jedson Nau, Esquire
100 Crescent Court, Suite 1700
Dallas, Texas 75201

RE: MUR 3104
Caroline Rose Hunt

Dear Mr. Nau:

This is in response to your letter dated September 4, 1990, which we received on September 5, 1990, requesting an extension until September 17, 1990, to respond to the Commission's finding of reason to believe against your client. After considering the circumstances presented in your letter, I have granted the requested extension. Accordingly, your response is due by the close of business on September 17, 1990.

If you have any questions, please contact Frances B. Hagan, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lisa E. Klein
Assistant General Counsel

9304093331

OGC 7811

HAND DELIVERED

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

90 SEP 10 AM 10:41

KIRKLAND & ELLIS
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

200 East Randolph Drive
Chicago, Illinois 60601

To Call Writer Direct:
312 861-2142

312 861-2000

Facsimile:
312 861-2200

September 7, 1990

BY MESSENGER

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 SEP 10 PM 12:22

Ms. Frances B. Hagan
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 3104

Dear Ms. Hagan:

I represent the Respondent in MUR 3104, Harold C. Simmons, and am writing to request: a) an extension of time to respond to the Commission's August 17, 1990 correspondence; and b) the commencement of pre-probable cause conciliation.

Mr. Simmons did not receive the Commission's letter until August 24, 1990, and I did not see it until September 4, 1990 (having been away from the office during the intervening period). In light of your request for detailed information and Mr. Simmons' desire to provide a thorough and complete response, I respectfully request a 20-day extension from the date I received the August 17 correspondence, or September 24, 1990.

Also, please consider this letter as a formal request that pre-probable cause conciliation negotiations be opened. Mr. Simmons intends to cooperate fully with the Commission in this matter.

Sincerely yours,

William S. Singer

WSS:gc

9304093332

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 12, 1990

William S. Singer, Esquire
Kirkland & Ellis
200 East Randolph Drive
Chicago, Illinois 60601

RE: MUR 3104
Harold C. Simmons

Dear Mr. Singer:

This is in response to your letter dated September 7, 1990, which we received the same day, requesting an extension until September 24, 1990, to respond to the Commission's finding of reason to believe against your client. After considering the circumstances presented in your letter, I have granted the requested extension. Accordingly, your response is due by the close of business on September 24, 1990.

If you have any questions, please contact Frances B. Hagan, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lisa E. Klein
Assistant General Counsel

9304093333

OGC 7888

100 Crescent Court
Suite 1700
Dallas, Texas 75201
(214) 871-8400

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

90 SEP 17 AM 10:12

September 14, 1990

VIA FEDERAL EXPRESS

HAND DELIVERED

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

Attention: Frances B. Hagan

Re: MUR 3104; Caroline Rose Hunt

Dear Ms. Hagan:

The purpose of this letter is to set forth factual and legal matters to demonstrate that the Federal Election Commission ("Commission") should take no action against Caroline Rose Hunt ("Hunt") after the Commission's initial finding that there is reason to believe that Hunt violated 2 U.S.C. Sections 441a(a)(3) and 441a(a)(1)(C) of the Federal Election Campaign Act of 1971, as amended, and as described in the Commission's letter to Hunt dated August 17, 1990.

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 SEP 17 PM 12:33

The Commission's letter requested a list of all contributions of any amount made by Hunt to candidates for federal office in connection with the 1988 election cycle. Accordingly, that list is enclosed. Please note that the enclosed list includes additional contributions not shown on the Commission's list, and that it excludes a $2,000 contribution to Congressman Armey's campaign and a $5,000 contribution to the Conservative Victory Committee, both of which were erroneously attributed to Hunt. No cancelled checks exist for these erroneously attributed contributions, and the undersigned has confirmed with both committees that their records do not show these contributions by Hunt. Enclosed is a copy of a letter from the Conservative Victory Committee stating that the $5,000 contribution was not received from Hunt. Congressman Armey's campaign has advised that it, too, will send a letter stating that the $2,000 contribution was not received, and this letter will be forwarded to you when received. Copies of cancelled checks evidencing contributions that were made are also enclosed.

9304093334

Response to reason to believe finding regarding 2 U.S.C. Section 441a(a)(3).

The Commission found that there was reason to believe that Hunt violated 2 U.S.C. Section 441a(a)(3), which limits total contributions by an individual in any calendar year to $25,000.00.

The Office of the General Counsel investigated Hunt's contributions based on an article in the Los Angeles Times ("Times"). A reporter for the Times contacted a representative of Hunt's office in March, 1990, indicating that she believed Hunt had exceeded her annual limit in 1988. We immediately conducted an internal investigation to ascertain the facts.

Hunt was under the impression, based on discussions with organizers, that one of her two largest contributions--either to the President's Trust in the amount of $10,000 or to the President's Dinner in the amount of $12,000--did not count against her annual limit. Our investigation revealed that Hunt's impression was correct in that one of the events, the President's Dinner, did in fact allow (i) donations to be designated or reallocated to comply with limits on political contributions or (ii) checks to be made payable to "The President's Dinner - Building Fund" (in which case the amount would not be considered a contribution). Had either of these technical requirements been met including making the check payable to "The President's Dinner - Building Fund" rather than "The President's Dinner", Hunt's $12,000 contribution would not have been includable as a contribution against the calendar year limitation. Our investigation did reveal that through an inadvertent oversight neither of these technical steps had been taken and that The President's Dinner Committee reported her contribution. A copy of Hunt's information card for the President's Dinner is enclosed.

Based on the facts set forth in the preceding paragraph, it is easy to understand why Hunt believed one of her two largest contributions did not count against her limit. Thus, if, in fact, she exceeded her annual limit, which we maintain she did not as discussed below, it was inadvertent based on a miscommunication or misunderstanding over a technicality.

As the enclosed list of contributions reflects, if the entire $12,000 contribution to The President's Dinner is included as a 1988 contribution, then Hunt's total 1988 contributions are $28,150. Upon discovery that the $12,000 contribution to The President's Dinner and the $10,000 contribution to the President's Trust had both been included as contributions in those Committee's reports, efforts were immediately undertaken to address the situation. These efforts produced a refund check from The President's Dinner dated April 30, 1990, in the amount of $4,500. A copy of this check is enclosed. Thus, Hunt's net contribution to the President's Dinner in 1988 was $7,500 and her total net contributions for 1988 were $23,650, which amount is under the $25,000 limit.

The Code of Federal Regulations specifically provides for actions to address potentially excess contributions to political committees, but does not specifically provide for actions to address potentially excess contributions exceeding the calendar

9304093335

year limitation. For example, 11 C.F.R. Section 110.1(b)(3)(i)(A) specifically allows for a refund check to be issued by a candidate's authorized political committee if a contribution for a designated election is made after that election and exceeds net debts outstanding. Furthermore, if a candidate is not a candidate in a general election, all contributions for the general election (which would be by their nature excess contributions) must be returned, refunded, or redesignated. 11 C.F.R. Section 110.1(b)(3)(i). Finally, a treasurer of an authorized political committee may request a written redesignation of an excess contribution by a contributor to a different election, and that contribution may be considered redesignated, if a written redesignation is received and the contributor has been advised that a refund of the contribution may be requested. 11 C.F.R. Section 110.1(b)(5). In each of these examples, refunds are a recognized after the fact procedure that negate the excess contribution issue as if it had never occurred.

Once Hunt's potentially excess contributions were discovered, a refund was promptly requested and obtained consistent with a procedure that is acceptable in other circumstances under the Code of Federal Regulations. Hunt should therefore be allowed to net her $4,500 refund from the President's Dinner against her initial $12,000 contribution to the President's Dinner. After netting her contribution to and refund from the President's Dinner her total contribution to the President's Dinner is $7,500 and her total 1988 contributions are only $23,650, which is below the $25,000 annual limit. Therefore the Commission should take no further action with regard to this reason to believe finding.

Response to reason to believe finding regarding 2 U.S.C. Section 441a(a)(1)(C).

The Commission found reason to believe that Hunt contributed $6,000 to the Conservative Victory Committee in 1988, $1,000 in excess of the allowed amount. As stated earlier, Hunt has no record of ever having made a $5,000 contribution to the Conservative Victory Committee on July 1, 1988. A telephone call to that committee confirmed that it had no record of a $5,000 contribution by Hunt. Details of her $1,000 contribution were readily available. A copy of a letter from the Conservative Victory Committee stating it has no record of receiving a $5,000 contribution from Hunt in 1988 is enclosed. Hunt's only contribution to this Committee was her $1,000 contribution made July 14, 1988. This amount does not exceed the $5,000 limitation and therefore the Commission should take no further action with regard to this reason to believe finding.

If the Office of the General Counsel still thinks further action is warranted, pre-probable cause conciliation is requested.

9304093336

Please call me at 214/871-8428 if you have any questions or I may be of further assistance.

Very truly yours,

C. Jedson Nau

C. Jedson Nau, Attorney

CJN/cac

Enclosures

9304093333337

Contributions of Caroline Rose Hunt in Connection with the

1988 Election Cycle

Candidate/Committee/Payee	Date	Amount
Lloyd Bentsen Election Committee	02/24/87	$ 2,000.00
Steve Bartlett Congressional Campaign Committee	05/13/87	100.00
Texas Women for Bush (George Bush for President)	03/01/88	100.00
Cottonwood Political Action Committee	03/04/88	1,000.00
The President's Trust (Republican National Committee)	04/05/88	10,000.00
The President's Dinner	04/22/88	7,500.00*
George Bush for President Compliance Committee	04/27/88	1,000.00
Jeffords-Mack Victory Committee	05/31/88	700.00
Williams Congress '88	06/27/88	250.00
1988 Victory Gala (Conservative Victory Committee)	07/14/88	1,000.00
	TOTAL	$23,650.00

*$12,000 initially given by check #1229 dated April 22, 1988; but a refund in the amount of $4,500 was obtained from the President's Dinner by check #1114 dated April 30, 1990.

9304093338

Conservative Victory Committee

September 12, 1990

Mr. Jed Nau
100 Crescent Court, Ste. 1700
Dallas, TX 75201

Dear Jed:

After reviewing our financial records for 1988 very closely, I have observed that Caroline Rose Hunt made a single contribution of $1,000 to the Conservative Victory Committee. Mrs. Hunt's check #1305 was dated July 14, 1988 and was made payable to the 1988 Victory Gala, a special project of the Conservative Victory Committee.

There is absolutely no record of any additional contribution from Mrs. Hunt to the CVC during 1988.

I'm happy to provide this information to you; should you need any additional information, please don't hesitate to contact me.

Sincerely,

Richard

Richard W. Kimble
Finance Director

9304093339

InterFirst 321/1110

CAROLINE HUNT SCHOELLKOPF :

(SEPERATE)
DALLAS, TEXAS

0001827

VENDOR NO.	CHECK NUMBER	DATE
	0001827	2-23-87

AMOUNT OF CHECK
$**2,000.00**

EXACTLY 2000 AND 00 CTS

PAY TO THE ORDER OF:

Senator Lloyd Bentsen Election Committee

CAROLINE HUNT SCHOELLKOPF
(SEPERATE)

C. H. Cambon

NOT VALID OVER $2,000.00

930400933340

CAROLINE HUNT SCHOELLKOPF
SEPARATE PROPERTY

1013

100 CRESCENT CT., SUITE 1700
033 4008 DALLAS, TX 75201-37

32-7129
3110

PAY TO THE ORDER OF Steve Butler $ 100.00

RECEIVED
Southwest Savings
P.O. Box [illegible] • Dallas, TX 75219

FOR

LIGHT BANC
May 13
TELLER 57
MAY 20 1987
SIDE
SAVINGS ASSOCIATION

Caroline Hunt Schoellkopf

300

930400933341

Caroline Rose Hunt

Southwest Savings
P.O. Box 190808, Dallas, Texas 75219

Caroline Rose Hunt

9304093333342

First RepublicBank
Dallas, Texas

32-1
1110

CAROLINE ROSE HUNT
DALLAS, TEXAS

0002941

VENDOR NO.	CHECK NUMBER	DATE
006092	0002944	03-04-88

AMOUNT OF CHECK
$ 1,000.00

PAY EXACTLY**********1,000*DOLLARS AND 00 CENTS

PAY TO THE ORDER OF:

COTTONWOOD POLITICAL ACTION
COMMITTEE
200 CRESCENT COURT STE 300
DALLAS, TX 75201

CAROLINE ROSE HUNT

E R Hunt

⑈0002941⑈ ⑆111000025⑆ 9304009333343

Caroline Rose Hunt

2222

3-5

April 5

033 2019

The Presidential Trust

10,000.00

ten thousand + no/100

Southwest Savings

P.O. Box 190908, Dallas, Texas 75219

Caroline Rose Hunt

⑈0000 10000000⑈

Caroline Rose Hunt

1229

[illegible] Averill Dr.

033 300- The Presidents Division 12,000 00/100

Twelve thousand

Southwest savings

P.O. Box [illegible], Dallas, Texas 75219

Caroline Rose Hunt

000'

Caroline Rose Hunt

[redacted]

Dallas, Texas 75201

1230

April 27 19 93

PAY TO THE ORDER OF George Bush for Pres. Comptroller Com. $ 1000.00

one thousand + no/100 ——————— DOLLARS

Southwest Savings
P.O. Box 192008, Dallas, Texas 75219

Caroline Rose Hunt

DOC.

930400933346

Caroline Ross Hunt

1243

May 31 85

Jefferson Nat. Victory Executive Acct.

Seven hundred & 40/100

Southwest Savings

P.O. Box 199000, Dallas, Texas 75219

Caroline Ross Hunt

DOC.

930409333347

Caroline Rose Hunt

1301

2711 Stemmons Fwy, Ste 1100
Dallas, Texas 75201

June 27 88

PAY TO THE ORDER OF 071-007-88

William Cowgill 88 $ 250.00

two Hundred & fifty x 00/100 DOLLARS

Southwest Savings
P.O. Box 190809, Dallas, Texas 75219

Caroline Rose Hunt

"CC"

9300409333348

Caroline Rose Hunt

1305

2100 Ross Ave., Ste 1100
Dallas, Texas 75201

031-0011 05-27-88-33 [illegible]

1955 Victory Gold

[illegible] Thousand & 00/100

Southwest Savings
P.O. Box 192008, Dallas, Texas 75219

Caroline Rose Hunt

00

9304009333349

The Federal Election Law requires that we request the following information:

Caroline Rose Hunt

Name

1000 Louisiana Court Suite 1700

Address

Dallas, TX 75201

City State Zip

Business Telephone Home Telephone

Name of individual to contact regarding our Dinner tickets

Additional Information Requested:

Please check if self-employed ☐

Occupation

Place of Employment

105 I
4/25/88
TX-8 BP
FIT
A

Paid for by the President's Dinner Committee. Proceeds will be divided evenly between the National Republican Congressional Committee and the National Republican Senatorial Committee to go towards the 1988 Republican election efforts. Donations may be designated or reattributed to comply with Federal limits on political contributions.

Corporate, labor union, or personal funds may be given, without limit, to The President's Dinner-Building Fund of the National Republican Congressional Committee and the National Republican Senatorial Committee. Please make these checks payable to The President's Dinner-Building Fund.

Because The President's Dinner is a joint fundraising committee, Federal law permits qualified multi-candidate Political Action Committees to contribute up to $30,000 from contributions already given to the National Republican Congressional Committee and the National Republican Senatorial Committee in 1988). The annual contribution limit to this Committee is $15,000.

Personal donations are not tax-deductible.

TX-8-BP

Copies of Mr. Charles Simmons reply card

93040933350

03/22/1990 17:18 FROM PRESIDENT'S DINNER 1990 TO 6572201 P.02

THE PRESIDENT'S DINNER
1101 17TH ST., NW., SUITE 808
WASHINGTON, DC 20036
PH. 202-659-1771

1114

4/30 19 90

15-120/540 D01

PAY TO THE ORDER OF Caroline Hunt $ $4,500.00

Four thousand, five hundred dollars and 00/100---------- DOLLARS

SOVRAN BANK DC NATIONAL
MAIN OFFICE
1801 K STREET, NW
WASHINGTON, D.C. 20006

Linda Gregory

⑈001114⑈ ⑆054001204⑆ 410133 2⑈

930409333

THE PRESIDENT'S DINNER

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 DVCP-3 V-2

DATE	DESCRIPTION	AMOUNT
4-30-90	Refund of 1988 contribution	$4,500.00

V-2

Bye 4/30.

06C7906

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

90 SEP 17 PM 3:27

SIKADDEN, ARPS, SLATE, MEAGHER & FLOM
1440 NEW YORK AVENUE, N.W.
WASHINGTON, D.C. 20005-2107
(202) 371-7000

TELEX: 904343
SKARSLAW-WASH
TELECOPIER:
(202) 393-5760
DIRECT DIAL
(202) 371-

BOSTON
CHICAGO
LONDON
LOS ANGELES
NEW YORK
SAN FRANCISCO
TOKYO
WILMINGTON

September 17, 1990

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 SEP 18 PM 12:35

BY HAND

Ms. Fran Hagan
Office of General Counsel
Federal Election Commission
999 E Street, Northwest
Washington, D.C. 20463

Re: MUR 3104
Ronald O. Perelman

Dear Ms. Hagan:

This letter will confirm our conversation today concerning an extension of time in the above-referenced matter. Presently, our response to the Commission's reason to believe finding is due on Monday, September 24, 1990. We need an additional two days to submit our response because of the religious holiday on the Thursday and Friday preceding the due date. Thus, we request an extension of time to submit our response by Wednesday, September 26, 1990.

Thank you for your consideration of this request.

Sincerely,

Kenneth A. Gross

9304093352

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 19, 1990

Kenneth A. Gross, Esquire
Skadden, Arps, Slate, Meagher & Flom
1440 New York Ave., N.W.
Washington, D.C. 20005-2107

RE: MUR 3104
Ronald O. Perelman

Dear Mr. Gross:

This is in response to your letter dated September 17, 1990, which we received on September 18, 1990, requesting an additional extension of two days to respond to the Commission's finding of reason to believe against your client. After considering the circumstances presented in your letter, I have granted the requested extension. Accordingly, your response is due by the close of business on September 26, 1990.

If you have any questions, please contact Frances B. Hagan, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lisa E. Klein
Assistant General Counsel

9304093353

06C7890

LAW OFFICES
MANATT, PHELPS & PHILLIPS
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

TELEPHONE (202) 463-4300
FAX (202) 463-4394
(202) 463-4395

1200 NEW HAMPSHIRE AVENUE, N.W.
SUITE 200
WASHINGTON, D.C. 20036

LOS ANGELES
11355 WEST OLYMPIC BOULEVARD
LOS ANGELES, CALIFORNIA 90064
(213) 312-4000

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 SEP 17 PM 3:19

September 17, 1990

Ms. Fran Hagan
Office of General Counsel
Federal Election Commission
999 E Street, N.W.
6th Floor
Washington, D.C. 20463

Re: MUR 3104, Ira Riklis

Dear Fran:

Enclosed please find a copy of the response on behalf of our client Ira Riklis in MUR 3104. Should you need any additional information, please do not hesitate to contact me.

Sincerely,

Eric F. Kleinfeld

Eric F. Kleinfeld
Manatt, Phelps & Phillips

Enclosure

9304093354

LAW OFFICES
MANATT, PHELPS & PHILLIPS
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
1200 NEW HAMPSHIRE AVENUE, N.W.
SUITE 200
WASHINGTON, D.C. 20036

TELEPHONE (202) 463-4300
FAX (202) 463-4394
(202) 463-4395

LOS ANGELES
11355 WEST OLYMPIC BOULEVARD
LOS ANGELES, CALIFORNIA 90064
(213) 312-4000

September 17, 1990

Lawrence M. Noble, Esq.
General Counsel
Federal Election Commission
999 E Street, N.W.
6th Floor
Washington, D.C. 20463

Re: MUR 3104, Ira Riklis

Dear Mr. Noble:

This constitutes the response of our client, Ira Riklis, in the above-captioned MUR. The Federal Election Commission ("FEC" or "Commission"), on the basis of an article in the Los Angeles Times, found reason to believe that Mr. Riklis violated 2 U.S.C. § 441a(a)(3) of the Federal Election Campaign Act ("Act") by exceeding his 1988 annual aggregate contribution limitation. For the reasons stated below, respondent respectfully requests that the Commission take no further action in this MUR and close the file.

Attached to this response, as you requested, is a list of all contributions made by respondent to candidates for federal office in connection with the 1988 election. Copies of checks are also included. As you will note, Mr. Riklis' aggregate 1988 candidate contributions were $7,500. In addition to those candidate contributions, he made contributions to federal political committees (PACs) totalling $7,000 in 1988. Thus, Mr. Riklis' total federal candidate and PAC contributions for the 1988 election was $14,500.

In late October 1988, Mr. Riklis also made a $15,000 contribution to the "Presidential Trust," a fundraising vehicle established by the Republican National Committee ("RNC"). While Mr. Riklis was fully aware that this contribution was going to the Republican Party, he was unaware that the contribution was in any way connected with a federal election. See Affidavit of Ira D. Riklis, ¶ 5. In fact, respondent specifically intended and assumed that this contribution was to be used solely for non-

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federal election purposes.[1/] Id., ¶ 5. When the contribution was solicited, there was no indication to Mr. Riklis that any of the funds were to be used in connection with a federal election.

Because Mr. Riklis was told to make out the check to the Presidential Trust, he did not know into what type of account the RNC would actually deposit it. Moreover, the contribution was made immediately prior to the 1988 general election, during a period when the presidential candidates could not accept private contributions. This, when combined with the instructions to Mr. Riklis to make the check out to the Presidential Trust, led him to believe that he was making a non-federal donation to a non-federal account of the RNC.[2/] Id., ¶ 5. This assumption was apparently commonly made by donors to the Presidential Trust; more than just respondent believed this to be a non-federal account.[3/] See Los Angeles Times article.

After having made the RNC contribution, Mr. Riklis assumed it was deposited into a non-federal account and used in connection with non-federal elections or other non-federal party activity. Respondent initially learned that this assumption may have been incorrect through the Los Angeles Times' investigation in early 1990, some one and one-half years after the contribution was made. Immediately after learning that the RNC had not deposited his money into a non-federal account, Mr. Riklis sought a refund. The RNC responded by refunding $5,000 to Mr. Riklis on May 2, 1990, two weeks after the Los Angeles Times story.

Thus, the facts make completely clear that respondent did not intend to exceed his aggregate limit, and that he did not believe he had done so. The Commission has long recognized the dispositive nature of a contributor's state of mind when facts concerning the making of a contribution are in dispute. For example, a contribution which a contributor believes is allocated/designated to a particular election cannot be reallocated by the recipient on a whim, merely to satisfy the Act's requirement. Here, the contributor believed without question, that he was making a non-federal contribution. Despite that belief, the RNC misdeposited the money into an apparently federal account. Thus, the Commission

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1/ This was previously reported in the Los Angeles Times article on which the Commission bases its finding.

2/ Additionally, then-President Reagan was not a candidate, further leading to confusion over the purposes of the "Presidential Trust."

3/ While the details of the solicitation are unclear, contributors may have not been fully informed as to the character of the Presidential Trust.

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is proceeding against a contributor who, at the very least, is a victim of a misdeposit by the RNC, and more likely, was simply not informed that his money would be used contrary to his wishes. The obvious confusion which occurred over the purpose of Mr. Riklis' RNC contribution should serve as the primary basis for no further action by the Commission.

Moreover, Mr. Riklis believes strongly that he made only $14,500 in federal contributions in connection with the 1988 election.[4/] This amount is well within the limitation of 2 U.S.C. § 441a(a)(3). During the 1987-1988 election cycle, the time period for which the aggregate must be calculated, Mr. Riklis had no idea that he was at, or even near, his aggregate limit, since he had some $9,500 remaining to contribute. Non-federal contributions, including those made to political parties for non-federal purposes, fall outside the limitation of 2 U.S.C. § 441a(a)(3). Where a contributor believes that he is making a non-federal contribution to a political party, which is commonly known to maintain a non-federal account and to be raising money for that purpose, his contribution should not be applied to the $25,000 aggregate limit, notwithstanding the recipient's deposit. Based on his sworn belief, Mr. Riklis' RNC contribution should not be included in his 1988 aggregate limit, and on that basis, the Commission should take no further action.

However, assuming arguendo, a federal purpose to Mr. Riklis' RNC contribution, the prompt refund, prior to any Commission action, makes his 1988 aggregate total $24,500, within the limit of 2 U.S.C. § 441a(a)(3). Given this immediate remedial action, which was made necessary because the RNC did not act in accordance with its contributor's wishes, no further action is justified.

Accordingly, for the reasons stated above, and on the basis of Ira Riklis' sworn affidavit, respondent respectfully requests that the Commission take no further action and close the file in MUR 3104. Should the Commission decline to close this matter, respondent requests the opportunity to pursue conciliation prior to a Commission finding of probable cause.

Sincerely,

Eric F. Kleinfeld

William C. Oldaker
Eric F. Kleinfeld
Manatt, Phelps & Phillips

Attachments

4/ This figure is the sum of all federal candidate and PAC contributions and excludes the RNC donation.

9304093357

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
) MUR 3104
)
Ira D. Riklis)

Affidavit of Ira D. Riklis

I, Ira D. Riklis, declare as follows:

1. The list attached to my response is a true and accurate list of all contributions I made to federal candidates in connection with the 1988 election. The total of those federal contributions was $7,500.

2. I also made two contributions to federal PACs in 1988, totalling $7,000.

3. In late 1988, I was approached concerning a possible contribution to the Republican Party. I was instructed to make my check out to the "Presidential Trust."

4. At that time, I was aware that President Reagan was not a candidate for re-election, and thus, neither he, nor anyone one on his behalf, could receive contributions for the presidential election. I was also aware at that time of large "soft money" donations being made by various individuals to the national political parties.

5. Based on my knowledge in paragraph 4 above, I believed that, when making a check out to the "Presidential Trust," I was making a soft money donation. I fully intended my contribution to the Republican Party to be a soft money donation.

6. I did not intend for my contribution to the Republican Party to be used in connection with any federal candidate or

9304093358

election. I did not know that the Presidential Trust was involved in federal elections. In addition, I have no knowledge as to what purpose my contribution was put.

7. I did not include my Republican Party donation in my 1988 annual limit, because I did not believe that soft money donations needed to be included. I had no intent to violate the law.

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

Ira D. Riklis

State of New York)
) SS
County of NEW YORK)

I, ANTHONY N. LICALSI, a Notary Public, hereby certify that on the 12TH day of September, 1990, there personally appeared before me Ira D. Riklis, who acknowledged signing the foregoing document and that the statements contained therein are true.

Notary Public

My Commission expires _____, 19____.

ANTHONY N. LI CALSI
Notary Public, State of New York
No. 60-7542307
Qualified in Westchester County
Certificate Filed in New York County
Commission Expires April 30, 1992

930409333359

Contributions to Federal Candidates in Connection with the 1988 Election

Date	Recipient	Amount
January 30, 1987	Danforth for Senate	$1,000
February 24, 1987	Biden for President	1,000
December 8, 1987	Burdick Campaign Committee	500
February 22, 1988	Hecht Re-election Committee	1,000 primary
February 22, 1988	Hecht Re-election Committee	1,000 general
April 18, 1988	Jack Buechner for Congress	1,000 primary
April 18, 1988	Jack Buechner for Congress	1,000 general
September 13, 1988	Lautenberg Committee	1,000
	Total	$7,500

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IRA D. NIKLIS
685 MADISON AVENUE
NEW YORK, N.Y. 10022

1249

January 30 87

PAY TO THE ORDER OF Committee for Re-Elect Senator Danforth $ 1,000.00

One Thousand and----------no cents---------- DOLLARS

AMERICAN SECURITY BANK, N.A.
Corporate Banking
1501 Pennsylvania Avenue, N.W.
Washington, D.C. 20013

NOT NEGOTIABLE

IRA D. NIKLIS

DELUXE - FORM DVC-3 V-2

DATE	DESCRIPTION	AMOUNT
1/30/87	Political contribution Solicited by Seymour Zises	$1,000.00

IRA D. RIKLIS
DIANA J. RIKLIS
1020 PARK AVENUE
NEW YORK, NEW YORK 10028

15

February 24 87

15
5

PAY TO THE ORDER OF Biden for President $1,000.0

One Thousand and----------no cents----------DOLL

AMERICAN SECURITY BANK, N.A.
Corporate Banking
[illegible]

NOT NEGOTIABLE

IRA D. RIKLIS
DIANA J. RIKLIS

DELUXE - FORM DVC-3 V-2

[illegible]	DESCRIPTION	[illegible]
2/24/87	Political contribution	$1,000.(

930409336 2

IRA D. RIKLIS
DIANA J. RIKLIS
1920 PARK AVENUE
NEW YORK, NEW YORK 10028

1950

December 8, ; 87

15-55
540

PAY TO THE ORDER OF Burdick Campaign Committee $ 500.00

Five Hundred ---------- .00/100 DOLLARS

AMERICAN SECURITY BANK, N.A.

NOT NEGOTIABLE

IRA D. RIKLIS
DIANA J. RIKLIS

DELUXE - FORM DVC-3 V-2

DATE	DESCRIPTION	AMOUNT
12/8/87	Political Contribution	$500.00

IRA D. RIKLIS
DIANA J. RIKLIS
1050 PARK AVENUE
NEW YORK, NEW YORK 10028

2039

February 22, 19 88

PAY TO THE ORDER OF Hecht Re-Election Committee $ 2,000.00

Two Thousand ---------- .00/100 DOLLARS

[redacted] SECURITY BANK, N.A.

NOT NEGOTIABLE

IRA D. RIKLIS
DIANA J. RIKLIS

DELUXE - FORM DVC-3 V-2

DATE	DESCRIPTION	AMOUNT
2/22/88	Polictical Contribution - Primary	$2,000.00

IRA D. RIKLIS
DIANA J. RIKLIS
[illegible] PARK AVENUE
NEW YORK, NEW YORK [illegible]

0020

February 22, 88

15-65/745

PAY TO THE ORDER OF Hecht Re-Election Committee $ 2,000.00

Two Thousand ---------- .00/100 DOLLARS

[illegible]

NOT NEGOTIABLE

IRA D. RIKLIS
DIANA J. RIKLIS

DELUXE - FORM D703 V2

DATE	DESCRIPTION	AMOUNT
2/22/88	Political Contribution - General Election	$2,000.00

IRA D. RIZLIS
DIANA J. RIZLIS
1020 PARK AVENUE
NEW YORK, NEW YORK 10028

2152

April 18, 88

10-62-340

PAY TO THE ORDER OF Buechner For Congress $ 2,000.00

Two Thousand ---------- .00/100 DOLLARS

[illegible] BANK, N.A.

NOT NEGOTIABLE

IRA D. RIZLIS
DIANA J. RIZLIS

DELUXE - FORM D7C-3 V2

DATE	DESCRIPTION	AMOUNT
4/18/88	Political Contribution	$2,000.00

IRA D. RUKLIS
533 MADISON AVENUE
NEW YORK, N.Y. 10022

1427

September 13, 88

PAY TO THE ORDER OF Lautenberg Committee $1,000.00

One Thousand ---------- .00/100 DOLLARS

AMERICAN SECURITY BANK, N.A.

NOT NEGOTIABLE

IRA D. RUKLIS

DELUXE - FORM DVC-3 V-3

	DESCRIPTION	AMOUNT
9/13/88	Political Contribution for Senator Frank Lautenberg	$1,000.00

IRA D. RIKLIS
565 MADISON AVENUE
NEW YORK, N.Y. 10022

1437

October 18, 88

15-35
540

PAY TO THE ORDER OF Presidential Trust $15,000.00

Fifteen Thousand ---------- .00/100 DOLLARS

AMERICAN SECURITY BANK, N.A.

NOT NEGOTIABLE

IRA D. RIKLIS

DELUXE - FORM DVC-3 V-2

DATE	DESCRIPTION	AMOUNT
10/18/88	Political Contribution	$15,000.00

REPUBLICAN NATIONAL FINANCE COMMITTEE
310 FIRST STREET, SE.
WASHINGTON, D.C. 20003

2497

April 30 19 90

PAY TO THE ORDER OF IRA RICKLIS

$ ***5,000.00***

FIVE THOUSAND AND 00/100

DOLLARS

Bank of Virginia
1716 South Jefferson Davis Highway
Arlington, Virginia 22202

FOR 1988 REFUND

Pat Hunt

⑈0002497⑈ ⑆056004089⑆ 651⑈722064 3⑈

930409333 69

OGC 7919

HERGE, SPARKS, CHRISTOPHER & BIONDI
ATTORNEYS AT LAW
SUITE 200
8201 GREENSBORO DRIVE
McLEAN, VIRGINIA 22102
(703) 848-4700

J. CURTIS HERGE
ROBERT R. SPARKS, JR.
A. MARK CHRISTOPHER
GEORGE V. BIONDI
DONNA LYNN MILLER
DIANE H. MAHSHIE

TELECOPIER NUMBER
(703) 893-7371

September 20, 1990

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 SEP 20 PM 1:57

The Honorable Lawrence M. Noble
General Counsel
Federal Election Commission
999 K Street, N.W.
Washington, D. C. 20463

Attention: Frances B. Hagan
Office of General Counsel

Re: MUR 3104
Donald J. Trump

9304093370

Dear Mr. Noble:

By letter dated August 17, 1990, the Chairman of the Federal Election Commission advised Mr. Donald J. Trump that the Commission had found reason to believe that he may have violated the provisions of 2 U.S.C. §441a(a)(3). By letter dated August 29, 1990, we responded on behalf of Mr. Trump, filing his Statement of Designation of Counsel and requesting an extension until September 21, 1990 within which to submit a substantive reply. By letter dated August 31, 1990, you granted the requested extension.

In reply to the finding by the Commission that Mr. Trump may have violated the provisions of 2 U.S.C. §441a(a)(3), we are submitting to you herewith Mr. Trump's Affidavit dated September 19, 1990. That Affidavit reveals the following:

1. In December, 1988, it first came to Mr. Trump's attention that the law imposed some type of limitation on the aggregate amount an individual may contribute to Federal candidates and committees.

2. Immediately upon learning of the possibility of such a limitation, Mr. Trump sought and obtained the advice of counsel. Counsel responded verbally and in writing, in

December, 1988, that "no individual may make Federal contributions aggregating more than $25,000 in any calendar year."

3. Upon receiving the verbal advice of counsel - acting even before counsel's written advice was received - Mr. Trump instructed that his contribution record for 1988 be reviewed. The audit revealed that Mr. Trump had made contributions aggregating $44,330 to Federal candidates and committees through that point in time in December, 1988.

4. Acting in reliance on the advice of counsel and the examination conducted by his staff, Mr. Trump immediately sought and obtained in 1988 $25,000 in refunds which, combined with other corrective action, reduced his aggregate Federal contributions made in 1988 to $18,330.

We would like to stress the fact that Mr. Trump acted voluntarily and expeditiously to correct an unintentional and unwitting violation; a violation which he came to learn from counsel involved a limitation on the aggregate amount an individual may contribute in any calendar year. In addition to seeking professional advice on the law, he immediately instructed his staff to conduct a review of his contributions made in 1988 and he promptly recovered refunds in an amount sufficient to bring him into compliance with the law as instructed by counsel. By any standard, these are exemplary actions.

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SUMMARY OF ARGUMENT

Our recommendation is that the Commission take no further action against the respondent in this matter. This recommendation is predicated upon the mitigating factors present in this case; factors that have proved to be decisive in previous Commission actions. First, the respondent voluntarily solicited and obtained the advice of counsel. Second, he immediately sought refunds sufficient to reduce the aggregate of his calendar year contributions to below the $25,000 limit. Third, he received the refunds within the calendar year. Fourth, to impose a fine or take further action against this respondent would serve no useful purpose, because respondent took the initiative to

correct his error immediately upon learning of its existence and he did so in a good faith reliance upon the advice of counsel.

DISCUSSION

The respondent's voluntary efforts to resolve this matter should be considered by the Commission in determining whether to take further action on this matter. In previous instances where it has reviewed violations of the Act, the Commission has treated respondents' voluntary efforts to comply with the law and its regulations as a good faith act which did not warrant or justify further action. Specifically, in MUR 375, a Commission staff memorandum stated that voluntary compliance, as opposed to waiting for Commission action, should be viewed as a mitigating factor. It is clear that that principle was persuasive in three compliance matters that involved violations of §441a(a)(3) and facts parallel to those under review.

Specifically, in MUR 1526, MUR 1893 and MUR 2167, the Commission voted to take no action against respondents who had exceeded the limitation in §441a(a)(3). All three cases involved situations where the individual discovered the violation on his own, acted promptly to nullify the effect and obtained refunds before compliance proceedings were instituted. In each case, the General Counsel recommended that the Commission not pursue the matter because of these mitigating factors. Thus, in factual situations practically identical to those present in this case, the Commission voted to take no further action against respondents who immediately sought and obtained refunds of excess contributions before formal proceedings were instituted. The Commission has looked differently upon violations of §441a(a)(3) where such mitigating factors were not present. See, for example, MURs 892, 1098, 1101 and 1904. Thus, the existence of voluntary and expeditious action, before a compliance file has been opened, has led uniformly to decisions to take no further action.

The fact that Mr. Trump's counsel was not accurate in his advice on the law does not warrant further action against Mr. Trump. The provision in §441a(a)(3) that "no individual shall make contributions aggregating more than $25,000 in any calendar year" is, while not generally known by the public, clear and concise. However, the subsequent sentence in §441a(a)(3), which provides that "any calendar year" does not mean any calendar

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year, is obscure, baffling and not easily understood by other than the most experienced practitioners. Mr. Trump asked for and was given advice by his attorney. Whether through inadvertence or misunderstanding, his attorney did not advise Mr. Trump of the existence or meaning of the second sentence in §441a(a)(3). As a result, Mr. Trump did not know the limitation applied to contributions made in other than 1988 to candidates whose elections were held in 1988. Neither Mr. Trump, nor any other individual, should be charged with the responsibility of asking a second lawyer for advice on the same issue.* Our system does not impose such an obligation and, thus, recognizes that an individual is justified in a matter of this nature when he acts in good faith upon the advice of counsel. Through his actions, Mr. Trump demonstrated that, had he been advised "calendar year" also meant "election cycle," the corrective action he took would have also addressed the contributions he made prior to 1988.

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CONCLUSION

As disclosed in his Affidavit, Mr. Trump discovered in 1988 the fact that he unwittingly violated §441a(a)(3) by making $44,330 in Federal contributions in calendar year 1988. This discovery was based on the advice of counsel that no individual may make Federal contributions aggregating in excess of $25,000 in "any calendar year." As a result of that discovery and counsel, Mr. Trump immediately sought and obtained refunds to reduce his aggregate outlay in calendar year 1988 to $18,330. Because these facts and mitigating circumstances parallel those in MURs 1526, 1893 and 2167, no further action should be taken in this matter and the file should be closed.

Respectfully submitted,

Sincerely yours,

J. Curtis Herge
Counsel to Donald J. Trump

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* Suppose lawyer number two advised that the law was different than that as interpreted by lawyer number one. Should the individual choose between the advice of lawyers one and two, or must he engage lawyer number three?

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
DONALD J. TRUMP,	)	MUR 3104
	)	
Respondent.	)	

AFFIDAVIT OF DONALD J. TRUMP

STATE OF NEW YORK)
) ss:
COUNTY OF NEW YORK)

DONALD J. TRUMP, being duly sworn, deposes and says:

1. That I am the Donald J. Trump named as the Respondent in the matter pending before the Federal Election Commission numbered MUR 3104.

2. That I submit this Affidavit to the Federal Election Commission voluntarily, and of my own free will, in an effort to set forth the relevant facts and to explain my intention and efforts to comply, and be in compliance with, the provisions of the Federal Election Campaign Act.

3. That, in December 1988, a newspaper reporter called my attention to the fact that Federal law apparently imposes an aggregate limit of $25,000.00 on the total amount an individual may contribute to Federal candidates and committees in any calendar year. Although I had had a general awareness that Federal law imposed limitations on the amounts an individual could contribute to a particular candidate or to a

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Herge, Sparks, Christopher & Biondi
Attorneys at Law
8201 Greensboro Drive
McLean, Virginia 22102
(703) 848-4700

particular type of committee, I was previously unaware of the existence of an aggregate calendar year limitation.

4. Upon learning of the possible existence of some type of aggregate limitation, I immediately instructed my attorney, Lawrence A. Mandelker, Esq., a member of the law firm of Berger & Steingut, 600 Madison Avenue, New York, New York, 10022, to advise me on the law applicable to limitations on contributions to Federal candidates and committees.

5. At a time in early December, 1988, Lawrence A. Mandelker, Esq., advised me verbally that the law provides "no individual may make Federal contributions aggregating more than $25,000.00 in any calendar year." Mr. Mandelker later confirmed his advice in a memorandum addressed to Anthony Gliedman, Executive Vice President of the Trump Organization, dated December 29, 1988, a copy of which is attached hereto as Exhibit A. Attention is called to the second paragraph on page 3 of the subject memorandum, which states:

> "No individual may make federal contributions aggregating more than $25,000 in any calendar year. Contributions covered by this limitation are those to: a candidate for federal office, a federal multi-candidate committee, a committee making independent expenditures*, a National Party Committee and to 'Delegates'**" (Footnotes omitted; see footnotes in original).

Mr. Mandelker's verbal and written advice was without qualification, to wit: the $25,000.00 aggregate limitation related to contributions made in a <u>calendar</u> year.

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6. Upon being advised by Lawrence A. Mandelker, Esq. that no individual may make Federal contributions aggregating more than $25,000.00 in a calendar year, I immediately instructed my bookkeeper and staff to audit all political contributions made by me in 1988 and to take such steps as may be indicated to bring me into compliance with the law.

7. Attached hereto as Exhibit B are copies of the ledger sheets and workpapers prepared by my bookkeeper and staff regarding contributions made by me in 1988. The starting point in their analysis was the Federal Election Commission computer generated list of individual contributions, which had been given to me by the newspaper reporter referred to in paragraph 3 hereof. Extracted from the list were all contributions made by me and reported as having been received in 1988. The aggregate total extracted from that list was $37,080.00. (See, line 1 on page 1 of Exhibit B.) Next, there were listed all contributions made by me in the period July 1, 1988 through early December, 1988, none of such contributions having been reported on the Federal Election Commission computer generated list. The aggregate total of the contributions made by me to Federal candidates and committees during that period was $7,250.00. (See, line 2 on page 1 of Exhibit B.) The conclusion of their research was that, by that point in December, 1988, I had made contributions aggregating $44,330.00 to Federal candidates and committees. (See, line 3 on page 1 of Exhibit B.)

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8. As a result of the finding that I had apparently made $44,330.00 in contributions to Federal candidates and committees between January 1, 1988 and early December, 1988, I immediately directed that corrective action be taken.

Attached hereto as Exhibit C is a copy of a letter to the Chairman of the Democratic Congressional Campaign Committee, dated December 12, 1988, requesting the refund of a $15,000.00 contribution made by me in March, 1988; and, a copy of the refund check dated December 30, 1988.

Attached hereto as Exhibit D is a copy of a letter to the Finance Chairman of the Republican National Committee, dated December 12, 1988, requesting the refund of a $10,000.00 contribution made by me in January, 1988; and, a copy of the refund check dated December 21, 1988.

In addition to the foregoing, Citizens for Joseph Kennedy, for their own reasons, asked in 1988 if the $1,000.00 contribution made by me in December, 1988, could be set aside and used in the 1990 primary election. I concurred.

The consequence of these actions was to reduce the aggregate of the contributions made by me in calendar year 1988 to $18,330.00. (See, last line on page 1 of Exhibit B.)

9. I did not know, until early December, 1988, that Federal law imposed an aggregate limitation on the amount an individual may contribute to Federal candidates and committees. When counsel advised me that the law states that no individual

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may make Federal contributions aggregating more than $25,000.00 in any calendar year, I immediately instructed that my contribution history in 1988 be analyzed and, when excess was discovered, sought and obtained refunds. As a result of the foregoing voluntary actions, I believed in good faith that I was in full compliance with the law.

IN WITNESS WHEREOF, I have executed this Affidavit this 19th day of September, 1990.

DONALD J. TRUMP

Sworn to before me, a notary public, this 19th day of September, 1990.

Notary Public

My Commission Expires:_____.

NORMA I FOERDERER
Notary Public, State of New York
No. 31-4743494
Qualified in New York County
Commission Expires Sept. 30, 1991

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Exhibit A

BERGER & STEINGUT

MEMORANDUM

TO: Anthony Gliedman,
Trump Organization

DATE: December 29, 1988

FROM: Lawrence A. Mandelker

RE: Federal, City and State
Contribution Limits

You have asked me to submit a memorandum setting forth to applicable rules (and potential pitfalls) applicable to campaign contributions to Federal, New York State and New York City candidates.

A) Federal

1. Candidates and their authorized committees.

An individual may give $1,000 per election to a candidate for federal office or his authorized committee. A primary convention or caucus on the one hand and a general election of the other hand are considered two separate elections. Unless earmarked for the particular primary/convention/caucus or general election, a contribution received on or before the date of the primary/convention/caucus will be deemed to be a contribution to that election. A contribution received after that date will be deemed to be a contribution to the general election.

If there is no primary/caucus or convention, or if the candidate runs unopposed in a primary, caucus or general election, a separate election is deemed to be held on the date on which the primary, caucus or convention would have been held.

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Each spouse (even in a single income family) has his or own separate contribution limit. Minor children (under 18) have their own limits provided:

- the child's decision to contribute is knowing and voluntary.
- the child owns or exclusively controls that which is given
- the contribution is not made from the proceeds of a gift given to the child for such purpose

2. Political committees established and maintained by a National Political Party ("National Political Committees")

National Political Committees include: (a) the National Committee, the House campaign committee and the Senate campaign committee. Although each of these committees may receive up to $20,000 from a contributor in any calendar year, an individual may not give more than $20,000 in the aggregate to the National Political Committees of each party in any calendar year.*

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*This limitation does not apply when the contributor is a PAC. The PAC can give $20,000 to each of a party's National Political Committees

No individual may make contributions to any other federal political committee (e.g. a PAC) which aggregates more than $5,000 in any calendar year.

No individual may make federal contributions aggregating more than $25,000 in any calendar year. Contributions covered by this limitation are those to: a candidate for federal office, a federal multi-candidate committee, a committee making independent expenditures*, a National Party Committee and to "Delegates"**

Contributions from the treasuries of a corporation, labor union or a national bank are prohibited. Additionally, national banks and federally chartered corporations may not make a contribution in connnection with a state or local election.

However corporations, labor unions, or national banks may form separate segregated funds (popularly called PACs) which can make contributions.

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* An expenditure for a communication expressly advocating the election or defeat of a clearly identified candidate which is made totally independently of a candidate's campaign.

** Although contributions to persons seeking appointment or election as a delegate to a national convention or to a State,district or local convention or caucus which slects delegates to the national convention are neither subject to the limits of federal law nor even reportable thereunder, such contributions are included within the calendar year aggregate limitation of $25,000.

Contributions from federal government contractors are prohibited. The prohibition applies to both personal and business funds of individual or sole proprietorship contractors. It does not apply to personal contributions by employeees, partners, shareholders or officers of businesses with government contracts, nor to their separate segregated funds.

B) State of New York

No person may contribute to a candidate or to his authorized committee more, in connection with a primary more than the aggregate of the product of five cents multiplied by the number of enrolled voters in the candidates's party in the district in which he is a candidate. For the general election, the formula is changed to the product of five cents multiplied by the number of all registered voters in the district. Notwithstanding the foregoing, the maximum contribution under the formula shall be not less than $1,000 per election and not more than $50,000 per election.* The primary and general election are each separate elections.

If a nomination or election to State Senator is involved, the contributor may give the higher of the formula or $4,000. If a nomination for assemblyman is involved, the contributor may give the higher of the formula or $2,500.

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*Since application of the formula to either the Democratic primary or to the general election for Mayor of the City of New York would exceed the $50,000 maximum, aggregate contributions involving those races are limited to $50,000.

If the contribution is in connection with a State Wide office, the formula becomes the product of 1/2 cent multiplied by the number of voters enrolled in the candidate's party in the State, in the case of a primary; and by the number of registered voters in the State, in the case of a general election.

A loan to a candidate or his committee made other than in the lender's regular course of business, is deemed a contribution by the lender to the extent not repaid by the time of the primary, special or general election. If the loan was made in the lender's course of business, it is deemed a contribution by the obligor and by any other person endorsing, co-signing, guaranteeing, collateralizing or otherwise providing security.

No person may contribute, loan or guarantee an aggregate of $150,000 in connection with state or local elections held in New York State within a calendar year.

A corporation may contribute up to an aggregate $5,000 to state and local candidates within a calendar year. Each corporate affiliate, subsidiary or parent has its own $5,000 limit.

C) City of New York

If a candidate for city office opts into public financing, a contributor whether, individual or corporate, may not contribute more than $3,000 for City Wide office, $2,500 for Borough Wide office and $2,000 for councilman for the primary, (run-off in the case of City Wide office) and for the general election.

As applied to a corporation, the contribution limit for an election applies in the aggregate to a corporation and all of its affiliates, subsidiaries and parents.

No person, corporation or partnership which is an applicant or bidder in a matter before the Board of Estimates, and no person who owns more than 5% of the outstanding stock or who is an officer of such

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corporation, and no person who is a partner in such partnership may for a period:

a) commencing six months before and ending twelve months after official consideration by the Board*.

b) make a contribution or loan to an incumbent member or a candidate for such office (or their authorized committees) in excess of $3,000.00.

As I interpret the law, a corporate parent would fall under the law (owns more than 5% of the outstanding stock)** but an affiliate or subsidiary would not.

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*Unclear what official consideration is. I would use the vote. Others use time of first calendaring until vote

**the law says 5% of the outstanding stock and not 5% of the issued and outstanding stock.

Exhibit B

FEDER ELECTION COMMISSION DATE 18SEP89

SELECTED LIST OF RECEIPTS & EXPENDITURES (G) (87-88) PAGE 6281

SE ION I - INDIVIDUAL CONTRIBUTIONS

CONTRIBUTOR/LENDER/TRANSFERRER REPORTING ENTITY MICROFILM LOCATION TRANSACTION TYPE	STREET ADDRESS	CITY	STATE ZIP REPORT TYPE	TYPE OF FILER DATE	ELECTION	AMOUNT
TRUMP, DONALD J COMMITTEE TO RE ELECT UNITED STATES SENATOR PAUL A HAW NS 87SEN/006/1200 #134827 CONTRIBUTION		NEW YORK	NY 10022 MID-YEAR REPORT	20FEB87	FOR 1986	1,000
TRUMP, DONALD J CONGRESSMAN FLOYD H FLAKE CAMPAIGN COMMITTEE 88HSE/342/4618 #253567 CONTRIBUTION		NEW YORK TRUMP ORGANIZATION	NY 10022 YEAR-END	2NOV87	PRIMARY	500
TRUMP, DONALD J CONGRESSMAN FLOYD H FLAKE CAMPAIGN COMMITTEE 88HSE/342/4618 #253568 CONTRIBUTION		NEW YORK TRUMP ORGANIZATION	NY 10022 YEAR-END	16NOV87	PRIMARY	500
TRUMP, DONALD J CRANSTON FOR PRESIDENT COMMITTEE INC 85FEC/332/4497 #001005 CONTRIBUTION		NEW YORK	NY 10022 APRIL QUARTERLY	23JAN85	PRIMARY	1,000
TRUMP, DONALD J DANFORTH FOR SENATE 87SEN/006/4069 #149372 CONTRIBUTION		NEW YORK TRUMP ORGANIZATION	NY 10022 MID-YEAR REPORT	18JUN87	PRIMARY	1,000
TRUMP, DONALD J DANFORTH FOR SENATE 88SEN/005/3723 #242121 CONTRIBUTION		NEW YORK TRUMP ORGANIZATION	NY 10022 YEAR-END	25NOV87	GENERAL	1,000
TRUMP, DONALD J DEMOCRATIC CONGRESSIONAL CAMPAIGN COMMITTEE INC 88HSE/349/2811 #329635 CONTRIBUTION		NEW YORK TRUMP ORGANIZATION	NY 10022 APRIL MONTHLY	24MAR88	PRIMARY	15,000
TRUMP, DONALD J EMPIRE LEADERSHIP FUND 88FEC/500/2146 #169195 CONTRIBUTION		NEW YORK THE TRUMP ORGANIZATION	NY 10022 YEAR-END	17SEP87	PRIMARY	2,500
TRUMP, DONALD J FRIENDS OF CONNIE MACK 88SEN/011/2194 #456968 CONTRIBUTION		PALM BEACH DEVELOPER	FL 33480 JULY QUARTERLY	24JUN88	PRIMARY	1,000
TRUMP, DONALD J FRIENDS OF LARRY PRESSLER COMMITTEE 87SEN/009/1610 #146851 CONTRIBUTION		NEW YORK THE TRUMP ORGANIZATION	NY 10022 MID-YEAR REPORT	12MAY87	GENERAL	1,000
TRUMP, DONALD J FRIENDS OF SENATOR DAVID KARNES 88SEN/007/3194 #325041 CONTRIBUTION		NEW YORK ENTREPRENEUR	NY 10022 APRIL QUARTERLY	30MAR88	PRIMARY	1,000
TRUMP, DONALD J MATCH ELECTION COMMITTEE 88SEN/007/3669 #342549 CONTRIBUTION		NEW YORK THE TRUMP ORGANIZA	NY 10022 APRIL QUARTERLY	2MAR88	PRIMARY	1,000

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FE AL ELECTION COMMISSION — DATE 18SEP88

SELECTED LIS RECEIPTS & EXPENDITURES (G) (87-88) — PAGE 4280

CTION I - INDIVIDUAL CONTRIBUTIONS

CONTRIBUTOR/LENDER/TRANSFERRER REPORTING ENTITY MICROFILM LOCATION TRANSACTION TYPE	STREET ADDRESS	CITY	STATE ZIP REPORT TYPE	DATE	TYPE OF FILER ELECTION	AMOUNT
TRUMP, BLAINE MR GEORGE BUSH FOR PRESIDENT INC COMPLEANCE 88FEC/527/2634 #345410 CONTRIBUTEON		NEW YORK CITY	NY 10151 MAY MONTHLY	15APR88	GENERAL	1,000
TRUMP, BLAINE MRS GEORGE BUSH FOR PRESIDENT, INC 88FEC/505/1829 #183907 CONTRIBUTEON		NEW YORK CHRISTIE MANSON & WOODS	NY 10021 YEAR-END	21OCT87	PRIMARY	500
TRUMP, DONALD BURDICK CAMPAIGN COMMITTEE 88SEN/005/2295 #240862 CONTRIBUTEON		NEW YORK THE TRUMP COMPANY	NY 10022 YEAR-END	2NOV87	PRIMARY	500
TRUMP, DONALD MOYNIHAN COMMITTEE INC 88SEN/007/3059 #336126 CONTRIBUTEON		NEW YORK TRUMP CONSTRUCTION C	NY 10022 APRIL QUARTERLY	22MAR88	GENERAL	1,000
TRUMP, DONALD TED WEISS FOR CONGRESS COMMITTEE 88HSE/342/4415 #278659 CONTRIBUTEON		NEW YORK SELF-EMPLOYED	NY 10022 YEAR-END	15SEP87	PRIMARY	1,000
TRUMP, DONALD WALLOP SENATE DRIVE, INC 88SEN/004/3709 #237716 CONTRIBUTEON		NY TRUMP ORGANIZATION	NY 10022 YEAR-END	19OCT87	PRIMARY	1,000
TRUMP, DONALD J BABBITT FOR PRESIDENT COMMITTEE 88FEC/505/5369 #190018 CONTRIBUTEON		NEW YORK TRUMP ORGANIZATION	NY 10022 YEAR-END	5OCT87	PRIMARY	1,000
TRUMP, DONALD J BROOKLYN DEMOCRATS - FEDERAL CAMPAIGN ACCOUNT 88FEC/536/1595 #423524 CONTRIBUTEON		NEW YORK TRUMP ORGANIZATION	NY 00000 JULY QUARTERLY	8APR88	PRIMARY	500
TRUMP, DONALD J CITIZENS FOR ARLEN SPECTER 88SEN/003/2323 #226448 CONTRIBUTEON		NEW YORK TRUMP ORGANIZATION	NY 10022 YEAR-END	10CT87	PRIMARY	1,000
TRUMP, DONALD J CITIZENS FOR JOE KENNEDY-86 87HSC/336/2762 #152477 CONTRIBUTEON		NEW YORK REAL ESTATE DEVLPR	NY 10022 MID-YEAR REPORT	24FEB87	GENERAL	1,000
TRUMP, DONALD J CITIZENS FOR TOWNSEND 87HSE/336/[illegible] #158189 CONTRIBUTEON		NEW YORK TRUMP ORGANIZATION	NY 10022 MID-YEAR REPORT	24FEB87	GENERAL	500
TRUMP, DONALD J COMMITTEE FOR CONGRESSMAN BILL GREEN 87HSE/335/4693 #151201 CONTRIBUTEON		NEW YORK CITY THE TRUMP ORGANIZATION	NY 10022 MID-YEAR REPORT	10JUN87	PRIMARY	1,000

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FEDERAL ELECTION COMMISSION — DATE 18SEP88

SELECTED LIST - RECEIPTS & EXPENDITURES (G) (87-88) — PAGE 4,282
SECTION 1 - INDIVIDUAL CONTRIBUTIONS

CONTRIBUTOR/LENDER/TRANSFERRER REPORTING ENTITY MICROFILM LOCATION	STREET ADDRESS TRANSACTION TYPE	CITY	STATE	ZIP REPORT TYPE DATE	TYPE OF FILER ELECTION	AMOUNT
TRUMP, DONALD J REENT REELECTION COMMITTEE 88SEN/001/3624 #250752	CONTRIBUTION	NEW YORK	NY	10022 YEAR-END 25AUG87	PRIMARY	1,000
TRUMP, DONALD J JACK KEMP FOR PRESIDENT 87FEC/488/1423 #105458	CONTRIBUTION	PALM BEACH	FL	33480 OCTOBER QUARTERLY 15SEP87	PRIMARY	1,000
TRUMP, DONALD J MCCARTHY FOR U S SENATOR 88SEN/011/1961 #427492	CONTRIBUTION	NEW YORK THE TRUMP ORGANIZATION	NY	10022 JULY QUARTERLY 24MAY88	PRIMARY	1,000
TRUMP, DONALD J NEW YORK REPUBLICAN COUNTY COMMITTEE 87FEC/481/4143 #093082	CONTRIBUTION	NEW YORK TRUMP CORP	NY	10022 MID-YEAR REPORT 10MAR87	PRIMARY	5,000
TRUMP, DONALD J NEW YORK STATE DEMOCRATIC COMMITTEE-FEDERAL ACCOUN 87FEC/481/0860 #133299	CONTRIBUTION	NEW YORK TRUMP ORGANIZATION	NY	10022 MID-YEAR REPORT 15MAY87	PRIMARY	1,000
TRUMP, DONALD J NEW YORK STATE DEMOCRATIC COMMITTEE-FEDERAL ACCOUN 87FEC/481/0860 #133300	CONTRIBUTION	NEW YORK TRUMP ORGANIZATION	NY	10022 MID-YEAR REPORT 15MAY87	PRIMARY	1,000
TRUMP, DONALD J PEOPLE FOR DIOGUARDI 88HSE/354/4800 #453912	CONTRIBUTION	NEW YORK TRUMP CORPORATION	NY	10021 JULY QUARTERLY 31MAY88	PRIMARY	1,000
TRUMP, DONALD J PEOPLE FOR JOHN HEINZ COMMITTEE 88SEN/011/2555 #438453	CONTRIBUTION	NEW YORK THE TRUMP ORGANIZATION	NY	10022 JULY QUARTERLY 26MAY88	GENERAL	1,000
TRUMP, DONALD J RANGEL FOR CONGRESS COMMITTEE 87HSE/337/2250 #353715	CONTRIBUTION	NEW YORK THE TRUMP ORGANIZATION	NY	10022 MID-YEAR REPORT 11JUN87	PRIMARY	1,000
TRUMP, DONALD J RANGEL FOR CONGRESS COMMITTEE 88HSE/341/2387 #275630	CONTRIBUTION	NEW YORK TRUMP ORGANIZATION	NY	10022 YEAR-END 13NOV87	GENERAL	1,000
TRUMP, DONALD J MR ALBERT GORE JR FOR PRESIDENT COMMITTEE INC 87FEC/487/0503 #099457	CONTRIBUTION	NEW YORK	NY	10022 OCTOBER QUARTERLY 24AUG87	PRIMARY	1,000
TRUMP, DONALD J MR CALIFORNIANS FOR SENATOR PETE WILSON 88SEN/005/0261 #334367	CONTRIBUTION	NEW YORK THE TRUMP ORGANIZATION	NY	10022 APRIL QUARTERLY 5FEB88	PRIMARY	1,000

Check Deposited By N.Y. Republican County Committee

CONTRIBUTOR/LENDER/TRANSFERRER / REPORTING ENTITY / MICROFILM LOCATION / TRANSACTION TYPE	STREET ADDRESS	CITY	STATE ZIP	TYPE OF FILER / REPORT TYPE / DATE	ELECTION	AMOUNT
TRUMP, DONALD J MR CITIZENS FOR JOE KENNEDY 1988 88HSE/341/2233 #273267 CONTRIBUTION		NEW YORK RE DEVL	NY 10022	YEAR-END 8DEC87	PRIMARY	1,000
TRUMP, DONALD J MR COURTER FOR CONGRESS COMMITTEE 88HSE/354/3824 #455743 CONTRIBUTION		NEW YORK DEVELOPER	NY 10022	JULY QUARTERLY 23JUN88	PRIMARY	1,000
TRUMP, DONALD J MR DOLE FOR PRESIDENT COMMITTEE INC 87FEC/488/0627 #124339 CONTRIBUTION		NEW YORK TRUMP ORGANIZATION	NY 10022	OCTOBER QUARTERLY 28AUG87	PRIMARY	1,000
TRUMP, DONALD J MR FRIENDS OF PHIL GRAMM 87SEN/007/1300 #140525 CONTRIBUTION		NEW YORK THE TRUMP ORGANIZATION	NY 10022	MID-YEAR REPORT 19MAY87	PRIMARY	1,000
TRUMP, DONALD J MR GEPHARDT FOR PRESIDENT COMMITTEE INC 88FEC/522/0152 #312924 CONTRIBUTION		JAMAICA	NY 11432	APRIL MONTHLY 4MAR88	PRIMARY	1,000
TRUMP, DONALD J MR PAUL SIMON FOR PRESIDENT 87FEC/488/2352 #118368 CONTRIBUTION		NEW YORK TRUMP ORGANIZATION	NY 10022	OCTOBER QUARTERLY 11AUG87	PRIMARY	1,000
TRUMP, DONALD J MR REPUBLICAN NATIONAL COMMITTEE - CONTRIBUTIONS 88FEC/519/2075 #301258 CONTRIBUTION		NEW YORK A REPUBLICAN NATIONAL FINANCE COMMITTEE THE TRUMP ORGANIZATION	NY 10022	APRIL QUARTERLY 25JAN88	PRIMARY	10,000
TRUMP, DONALD J MR WEICKER '88 COMMITTEE 88SEN/001/0607 #251247 CONTRIBUTION		NEW YORK THE TRUMP ORGANIZATION	NY 10022	YEAR-END 6AUG87	PRIMARY	1,000
TRUMP, DONALD J MR WEICKER '88 COMMITTEE 88SEN/008/0540 #334892 CONTRIBUTION		NEW YORK	NY 10022	APRIL QUARTERLY 16FEB88	GENERAL	1,000
TRUMP, DONALD MR GEORGE BUSH FOR PRESIDENT INC COMPLIANCE 88FEC/527/2630 #345390 CONTRIBUTION		NEW YORK CITY DEVELOPER	NY 10151	MAY MONTHLY 15APR88	GENERAL	1,000
TRUMP, DONALD MR RIEGLE FOR SENATE IN '88 COMMITTEE 88SEN/003/0280 #243541 CONTRIBUTION		NEW YORK TRUMP ORGANIZATION	NY 10022	YEAR-END 4AUG87	PRIMARY	500
TRUMP, EDDIE DUKAKIS FOR PRESIDENT COMMITTEE, INC 88FEC/522/4702 #357743 CONTRIBUTION		NEW YORK THE TRUMP GROUP	NY 10022	MAY MONTHLY SUPERSEDED	PRIMARY	1,000

Received REFUND of $10,000 Contrib due to overage a contrib
Refund Received 12/15/88

9304093393

National 45-104 Eye-Ease 45-404 20/20 Bull Made in USA

SUMMARY OF FEDERAL POLITICAL CONTRIBUTIONS
ALL MADE BY O/S/K
1988

	1	2	3	4
1				
2	TOTAL PER FEDERAL ELECTION COMMISSION REPORT FOR THE PERIOD 1/1/88 - 6/30/88 (See attached)		37080 -	
3				
4				
5	TOTAL PER ATTACHED SCHEDULE 7/1/88 - 12/31/88		7250 -	
6				
7	TOTAL PAID FOR 1988			44330 -
8				
9				
10	LESS RETURN OF CONTRIBUTION MADE TO REPUBLICAN			
11	EAGLES (DEPOSITED TO O/S/K ACCOUNT 12/2/88)		10000 -	
12				
13	RETURN OF CONTRIBUTION MADE TO DEMOCRATIC			
14	CONGRESSIONAL DINNER		1500 -	
15				
16				
17	RE-ALLOCATION OF CONTRIBUTION TO CITIZENS			
18	FOR JOHN KENNEDY TO 1990 PRIMARY (See letter		1000 -	26000
19	on Back cover of folder)			
20				
21				
22				
23	NET FEDERAL POLITICAL CONTRIBUTIONS PAID			18330 -
24	BY O/S/K FOR 1988			
25				
26				
27				
28				
29				
30				
31				
32				
33				
34				
35				
36				
37				

Political Contributions
Paid By D/S 15

DATE	CK #	PAYEE	AMOUNT *BANK-VI	FLOOR TAL
2/19/88	4055	FRIENDS OF SENATOR D'AMATO	* 400	400
2/11	4023	DOUGLAS FOR CONGRESS	1000	1000
2/15	9422	FRIENDS FOR BRYAN	1000	1000
2/8	4324	COMMITTEE FOR GOODMAN	2000	
2/8	4325	HOUSE LEADERSHIP COUNCIL	1000	
9/6	4997	PUERTO RICAN VOLUNTEER COMMITTEE	* 1000	
9/19	4666	CITY COUNCIL POLITICAL ACTION COMM	* 1000	
	4667	DEMOCRATIC SENATORIAL CAMPAIGN COMM	* 250	
9/28	4685	MORGENTHAU 89	5000	
9/26	4687	FLORIO 88 COMMITTEE	* 1000	1000
10/1	1034	COMM RE-ELECT CLAUDINE SCHNEIDER	* 500	500
10/1	1119	TOM LIBOUS FOR STAT	1000	
10/24	1161	TED WEISS FOR CONGRESS	250	250
10/24	1147	DEMOCRATIC SENATE CAMPAIGN COMM	* 300	
10/24	1230	COMM FOR A GOLD	2500	
10/25	4749	JIM QUIGLEY CAMPAIGN FUND	1000	
	4750	ROBERT WEXLER CAMPAIGN FUND	1000	
11/1	1335	DAWKINS FOR U.S. SENATE	1000	1000
11/1	1332	SENATE DEMOCRATIC CAMPAIGN	5000	
11/4	1936	HARRY JOHNSTON FOR CONGRESS	500	500
11/4 (**)	1486	KEN ADAMS FOR CONGRESS	500	500 (**)
11/4	1577	FRIENDS OF SENATOR D'AMATO	* 1000	1000
11/4	1571	CITIZENS FOR JOE KOLTER	* 1000	1000
				7750
(**) CHECK VOIDED IN 12/88				(500)
				7250

9304093333993

Exhibit C

December 12, 1988

Beryl Anthony
Chairman
Democratic Congressional Campaign Committee
430 South Capital
2nd Floor
Washington, D.C. 20003

Dear Mr. Anthony:

In reviewing our books at year-end, we have discovered that campaign contributions in excess of the individual calendar year limitation were inadvertently made during 1988. Among the contributions was a $15,000 check made payable to the Democratic Congressional Campaign Committee on March 7, 1988. A copy of the check is enclosed.

Accordingly, we would appreciate it if the Democratic Congressional Campaign Committee would refund $15,000 by check payable to the contributor and sent to the undersigned.

Very truly yours,

Allen Weisselberg
Controller

AW/jc
Encl.

93040933394

THE TRUMP ORGANIZATION
725 FIFTH AVENUE · NEW YORK, N. Y. 10022 212 · 832 · 2000 TELEX · 427715

DONALD J. TRUMP

FFA 400 I

2881

3/7 19 87

PAY TO THE ORDER OF Democratic Congressional Dinner Committee

$ 15,000.00

EXACTLY FIFTEEN THOUSAND AND 00 CTS DOLLARS

The Chase Manhattan Bank, N.A.
161 - 10 Jamaica Avenue
Jamaica, NY 11432

CHASE

⑈000150000⑈

⑆021404093333395⑆

9239

930409333396

DEMOCRATIC CONGRESSIONAL
CAMPAIGN COMMITTEE
GENERAL CHECKING ACCOUNT
430 SOUTH CAPITOL STREET
WASHINGTON, D.C. 20003

SOVRAN BANK
DC NATIONAL
MAIN OFFICE
1501 K STREET, NW
WASHINGTON, D.C. 20005

15-170
540 D

December 30 19 88

PAY Fifteen thousand and xx/100 DOLLARS $ 15,000.

TO THE ORDER OF
Donald Trump
721 5th Avenue
New York, NY 10022

⑈00009239⑈ ⑆054001204⑆ ⑈268071 8⑈

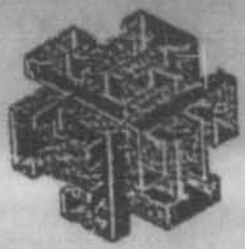
DEMOCRATIC CONGRESSIONAL
CAMPAIGN COMMITTEE

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 WVC-3 V-7

Contribution Refund
FFR 400I

Exhibit D



December 12, 1988

Lawrence E. Bathgate, III
Finance Chairman
Republican National Committee
310 First Street, S.E.
Washington, D.C. 20036

Dear Mr. Bathgate:

In reviewing our books at year-end, we have discovered that campaign contributions in excess of the individual calendar year limitation were inadvertently made during 1988. Among the contributions was a $10,000 check made payable to the Republican National Committee on January 11, 1988. A copy of the check is enclosed.

Accordingly, we would appreciate it if the Republican National Committee would refund $10,000 by check payable to the contributor and sent to the undersigned.

Very truly yours,

Allen Weisselberg
Controller

AW/jc
Encl.
Certified Mail, r.r.r.
#P 581 900 776

9304093398

THE TRUMP ORGANIZATION
725 FIFTH AVENUE · NEW YORK, N. Y. 10022 212·832·2000 TELEX·427715

THIS CHECK IS DELIVERED FOR PAYMENT OF THE FOLLOWING ACCOUNTS

DATE		AMOUNT	
TOTAL OF INVOICES			
LESS ___ % DISCOUNT			
LESS			
TOTAL DEDUCTIONS			
AMOUNT OF CHECK			

DONALD J. TRUMP

2340

1/11 19 88

1-2/210

PAY TO THE ORDER OF Republican Eagles $ 10,000.00

EXACTLY ***10,000 AND 00 CTS DOLLARS

CHASE

The Chase Manhattan Bank, N.A.
181 - 10 Jamaica Avenue
Jamaica, NY 11432

⑆021721206⑆ 0521-152

⑈002002000⑈

⑆021040933 3999

REPUBLICAN NATIONAL FINANCE COMMITTEE
310 FIRST STREET, SOUTHEAST WASHINGTON, D.C. 20003 202-863-8720

December 21, 1988

BY FEDERAL EXPRESS

Mr. Allen Weisselberg
Controller
The Trump Organization
725 Fifth Avenue
New York, New York 10022

Dear Mr. Weisselberg:

Per your letter of December 12, 1988, I've enclosed a refund check in the amount of $10,000 made payable to Mr. Donald Trump.

Please let me know if you have additional questions about this matter.

Sincerely,

Betsy Tyson

Elizabeth A. Tyson
Assistant Director/
Director, Team 100

cc: Lawrence E. Bathgate, II

9304093400

PAID FOR BY THE REPUBLICAN NATIONAL COMMITTEE

REPUBLICAN NATIONAL FINANCE COMMITTEE
310 FIRST STREET, SE.
WASHINGTON, D.C. 20003

2404

DECEMBER 21 19 88

52-408/540 476

PAY TO THE ORDER OF DONALD J. TRUMP $ 10,000.00

TEN THOUSAND AND 00/100 DOLLARS

Bank of Virginia
1758 South Jefferson Davis Highway
Arlington, Virginia 22202

FOR REFUND

⑈0002404⑈ ⑆056004089⑆ 651⑈7220643⑈

930409334 01

0647940

LAW OFFICES
WUNDER, RYAN, CANNON & THELEN
1615 L STREET, N.W., SUITE 650
WASHINGTON, D. C. 20036
(202) 659-3005
FACSIMILE: (202) 659-3010

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 SEP 21 PM 5:02

September 21, 1990

Lawrence M. Noble, Esq.
General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, DC 20463

Attn: Francis B. Hagan

RE: MUR 3104 - Henry Kravis and Raymond Kravis

Dear Mr. Noble:

Please find enclosed the response from Mr. Raymond Kravis and Mr. Henry Kravis in the above-referenced matter.

Thank you for your attention to this matter.

Very truly yours,

Paul E. Sullivan

cc: Kenneth Levine, Esq.
Raymond Kravis
Henry Kravis
Chairman Elliott
Vice-Chairman McGarry
Commissioner Aikens
Commissioner Josefiak
Commissioner McDonald
Commissioner Thomas

9304093402

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
Henry Kravis	)	**MUR 3104**
	)	

I.

INTRODUCTION

On August 23, 1990 Henry Kravis (hereinafter "Kravis" or "Respondent") received notice from the Federal Election Commission (hereinafter "FEC" or "Commission") indicating that pursuant to 2 U.S.C. §437g(a)(2), the Commission had found reason to believe ("RTB") that in 1988 the Respondent had exceeded the $25,000 annual aggregate limit and had made two excessive contributions to federal candidates in violation of 2 U.S.C. §441a(a)(3) and 2 U.S.C. §441(a)(1)(A).

On August 30, 1990 Respondent requested a fifteen (15) day extension of time in which to respond to the Commission's findings and the extension of time was granted by a letter from the Commission dated September 12, 1990. This filing is made in accordance with the September 21, 1990 extension granted by the Commission.

In its RTB notice to the Respondent, the Commission requested that the Respondent list all contributions, including those of less than $500, for the 1988 election cycle. Supporting documentation for those contributions was also requested.

Pursuant to that request, the appropriate contributions are listed herein and

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supporting documentation is provided. Respondent also has provided the Commission with documentation of refunds, reattributions, and explanations relative to the apparent discrepancy between Respondent's records and those maintained by the Commission.

II.

DOCUMENTATION AND ANALYSIS OF RESPONDENT'S 1988 CONTRIBUTIONS

Attached hereto, at Exhibit "A" is a listing of the contributions and copies of the corresponding checks which Respondent's records indicate were made for 1988 election cycle.

Explanations are required to clarify several discrepancies relevant to the FEC record and to clarify several allocation issues apparent from the face of the checks.

1. Bush for President:

   Check #1437 dated March 7, 1987 was intended as a contribution of $1,000 from Respondent and $1,000 from Respondent's spouse. The FEC record reflects this allocation.

2. Metzenbaum for Senate:

   Check #2090 in the amount of $2,000 dated November 4, 1987 was a contribution of $1,000 to the primary and $1,000 to the general election for Metzenbaum for Senate. The FEC records reflects this allocation.

3. Moynihan committee:

   Three separate checks were made payable to the Moynihan Committee totalling $3,000. The Commission's records do not reflect the contribution

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made by check #2864 dated April 15, 1988 in the amount of $1,000. The other two checks, #2281 for $1,000 dated December 11, 1987 and #2615 for $1,000 dated February 24, 1988 make up the balance of the $3,000 in contributions.

In compliance with the FEC regulations, the Moynihan Committee secured from the Respondent and his spouse the appropriate written redesignation allocating the contributions between Respondent and his spouse for the primary and general. Thus, the Moynihan records reflect that Respondent made a $1,000 contribution to the primary and general elections and his spouse, made contributions of $1,000 in the primary and $289 in the general election.

4. People for John Heinz:

In the Commission's RTB notice to Respondent's, the Commission indicates a total of $62,711 in contributions were made. That figure improperly includes a $1,000 contribution refunded to the Respondent by the Heinz Committee. Check #3062 for $1,000 dated May 20, 1988 was refunded to the contributor on October 27, 1988 based on the Commission's own records. Therefore, with respect to the 2 U.S.C 441a(a)(3) limits, this $1,000 should not be included.

5. Governor's Ball of New Jersey

Check #3429 in the amount of $25,000 dated August 31, 1988 represents a

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$20,000 contribution to the New Jersey Republican State Committee account and $5,000 to its Victory '88 federal account and is so reflected on the FEC reports.

6. Challenge '88:

The FEC records reflect a contribution on June 1, 1988 in the amount of $1,000 from Respondent. A review of Mr. Kravis' records indicates that no such contribution was made by the Respondent. Therefore, this amount of $1,000 should be deducted from the $62,711 aggregate excessive figure submitted by the Commission.

7. Hoagland for Congress:

Respondent made a contribution to Hoagland for Congress, check #2051 in the amount of $250 on October 27, 1987.

With these adjustments noted above, the Respondent's records indicate a total of $59,961 in contributions attributable to the 1988 election cycle by Respondent. A summary of these checks and adjustments are set forth at Exhibit "A" attached hereto.

Refunds

Prior to receiving notice from the Commission regarding these alleged violations, the Respondent on his own volition, sought and received refunds and redesignation so that his aggregate contributions for 1988 came within the $25,000 limit.

Respondent has received refunds or arranged for redesignation of contributions totalling $36,000. An itemized listing and copies of the appropriate redesignation or refunds are attached hereto at Exhibit"B".

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As a result of these redesignation and refunds, Respondent's 1988 aggregate contributions amount to $23,961.

III.

EXCESSIVE CONTRIBUTIONS TO CANDIDATES

The RTB notice alleges that the Respondent has made two excessive contributions to 1988 campaigns.

The first is an alleged $1,000 excessive contribution to People for Heinz Committee. As noted above, this contribution made May 20, 1988 was refunded to the contributor on October 27, 1988. Thus, this should not be counted toward the §441a(a)(3) violation.

The second alleged excessive contribution resulted from contributions made to Californians for Pete Wilson. Respondent issued two checks to the Wilson Campaign. The first check, #2184 in the amount of $2,000 dated November 24, 1987 was attributed $1,000 to the primary and $1,000 to the general election. The FEC record reflects this. The second check, #3078 dated May 26, 1988 in the amount of $1,000 is shown as having been received by the Wilson Campaign on September 19, 1988 for the primary election. The Commission records then indicate that $1,000 of the November 24th contribution was reattributed on September 19, 1988 to the Respondent's spouse. This appears to be a clerical error by the Californians for Wilson Committee. The last $1,000 check reported as having been received September 19, 1988 was intended to and should have been the contribution reattributed to the Respondent's spouse. It was not intended

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nor does it make sense to reattribute $1,000 of the initial contribution to the spouse rather than reattributing the last contribution received by the committee. Thus, the reattribution was made in accordance with 11 CFR 110.2(k)(B) and should not be the basis for an excessive contribution; the Respondent made a $1,000 contribution to the primary and the general and the Respondent's spouse, through timely reattribution, made a $1,000 contribution to the primary election.

CONCLUSION

These documents are submitted in response to the Commission's request for production of documents and should there be further questions, please contact us at your earliest opportunity.

Respectfully submitted,

Wunder, Ryan, Cannon and Thelen

By: _____
Kenneth S. Levine
Paul E. Sullivan, Counsel
for Respondent

cc: Chairman Elliott
Vice-Chairman McGarry
Commissioner Aikens
Commissioner Josefiak
Commissioner McDonald
Commissioner Thomas

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EXHIBIT "A"

HENRY R. KRAVIS

FEC Listed Contributions

Check #	Amount	Date of Check	Candidate/Committee
1243	$1,000	03/05/87	Kemp, Jack for Pres
1298	$1,000	03/24/87	Dole for Pres
1437	$2,000*	03/07/87	Bush for Pres
1492	$1,000	05/15/87	Bentsen, Lloyd Sen
1536	$1,000	06/01/87	Du Pont, Pete Pres
1595	$1,000	06/12/87	Danforth for Sen
1639	$1,000	06/24/87	Cranston for Pres
2090	$2,000**	11/04/87	Metzenbaum Senate '88
2184	$2,000***	11/24/87	Wilson, Pete Cmte
2229	$1,000	12/04/87	Bentsen, Lloyd Sen
2271	$1,000	12/11/87	Danforth for Sen
2281	$1,000****	12/11/87	Moynihan Cmte
751	$2,000*****	12/28/87	Dawkins for Sen
2340	$1,000	01/11/88	Dukakis for Pres
2590	$5,000	02/16/88	NY Rep Co Cmte
2674	$1,000	03/03/88	Engeleiter Sen
2615	$1,000******	02/24/88	Moynihan Cmte
2748	$5,000	03/18/88	Fd for Amer Future
3077	$1,000	05/26/88	Karnes, David Fr of
3048	$1,000	05/18/88	Montoya, Rick Sen
2953	$1,000	05/02/88	Heinz, John Peo For
3062	$1,000*******	05/20/88	Heinz, John Peo For
3076	$1,000	05/25/88	Wallop Sen Drive
3131	$5,000	06/08/88	NRSC

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Check #	Amount	Date of Check	Candidate/Committee
3013	$5,000	05/10/88	Sen Majority Fund
3194	$10,000	06/24/88	RNC Pres Trust
3429	$25,000********	08/31/88	Governors Ball of NJ
3078	$1,000	05/26/88	Wilson, Pete Cmte
1008	$1,000	09/20/88	Victory '88 Cmte
1057	$1,000	09/29/88	Roth Sen Cmte
TOTAL:	$59,711	Total contributed towards 1988 federal limit (including footnote explanations).	

---

* Check memo notes that contribution is both for Carolyne and Henry Kravis. Thus, contribution is credited: Henry Kravis, $1,000; Carolyn Kravis, $1,000.

** Contribution credited: $1,000 for primary election; $1,000 for general election.

*** Contribution credited: $1,000 for primary election; $1,000 for general election. Primary contribution reattributed to spouse 9/19/88.

**** Contribution attributed: $711 for primary election, $289 for general election.

***** Contribution credited: $1,000 for primary election; $1,000 for general election.

****** Contribution attributed: $711 to Henry Kravis; $289 to spouse.

******* Refunded to contributor 10/27/88.

******** The New Jersey State Republican Committee divided the contribution: $20,000 to New Jersey State Committee - State Account; $5,000 to Victory '88 - Federal Account.

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Contributions Listed by FEC
But No Check or Record of Contribution Found

Check #	Amount	Date of Check	Candidate/Committee
	$1,000	06/01/88	Challenge '88

Checks Not Listed by FEC

Check #	Amount	Date of Check	Candidate/Committee
2051	$250	10/27/87	Hoagland for Congress
2864	$1,000*	04/15/88	Moynihan Cmte
TOTAL:	$250		
GRAND TOTAL:	$59,961	(including footnote explanations)	

* Contribution reattributed to spouse.

Henry Kravis Refunds or Redesignations

	Amount	Date of Check	Candidate/Committee
Refund	$5,000	04/06/90	NRSC
Redesig-nation	$5,000	04/10/90	NY Rep Co Cmte
Refund	$5,000	04/20/90	Fd for Amer Future
Refund	$10,000	04/30/90	RNC Pres Trust
Redesig-nation	$5,000	05/22/90	NJ Rep State Cmte
Refund	$5,000	06/15/90	Senate Maj Fund
Refund	$1,000	09/20/90	Wilson Re-Elect Cmte
TOTAL REFUNDS - OR REDESIGNATIONS:	$36,000		
ADJUSTED GRAND TOTAL	$23,961		

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Henry Kravis Refunds or Redesignations

	Amount	Date of Check	Candidate/Committee
Refund	$5,000	04/06/90	NRSC
Redesig-nation	$5,000	04/10/90	NY Rep Co Cmte
Refund	$5,000	04/20/90	Fd for Amer Future
Refund	$10,000	04/30/90	RNC Pres Trust
Redesig-nation	$5,000	05/22/90	NJ Rep State Cmte
Refund	$5,000	06/15/90	Senate Maj Fund
Refund	$1,000	09/20/90	Wilson Re-Elect Cmte
TOTAL REFUNDS - OR REDESIGNATIONS	$36,000		
ADJUSTED GRAND TOTAL	$23,961		

93040933413

HENRY R. KRAVIS
[illegible] EAST 71ST STREET
NEW YORK, NY 10021

J8281i 1243

1-12
210

March 5 1987

PAY TO THE ORDER OF Jack Kemp for President $ 1000 00/100

One Thousand 00/100 DOLLARS

CHEMICAL BANK
540 Madison Avenue
New York, N.Y. 10022

FOR Contribution

Henry R. Kravis

⑈0000600000⑈

930'40933414

28

1298

HENRY R. KRAVIS
71 EAST 71ST STREET
NEW YORK, NY 10021

3-12
210

3/24 19 87

PAY TO THE ORDER OF Dole for President $ 1000 00

THE SUM ONE THOUSAND DOLS 00 CTS DOLLARS

CHEMICAL BANK
640 Madison Avenue
New York, N.Y. 10022

FOR 01-1WPC Contribution

202433261
Henry Kravis

⑈0000100000⑈

⑆930409334⑈5

HENRY R. KRAVIS
71 EAST 71ST STREET
NEW YORK, NY 10021

1437

1-12
210

May 7 1952

PAY TO THE ORDER OF Bush for President $ 2,000.00

THE SUM 2000 DOLS 00 CTS DOLLARS

CHEMICAL BANK
640 Madison Avenue
New York, N.Y. 10022

FOR Contribution - Carolyn + Henry Kravis

H R Kravis

"0000 200000"

⑈230409334⑈16

HENRY R. KRAVIS
71 EAST 71ST STREET
NEW YORK, NY 10021

1492

1-12
210

May 15 19 87

PAY TO THE ORDER OF Lloyd Bentsen Re-Election Committee $ 1000 XX

THE SUM ONE THOUSAND DOLS 00 CTS DOLLARS

CHEMICAL BANK
640 Madison Avenue
New York, N.Y. 10022

FOR Contribution
(Obligation)

Henry R. Kravis

"0000100000"

930409334117

HENRY R. KRAVIS
71 EAST 71ST STREET
NEW YORK, NY 10021

1536

1-12
210

June 1 19 87

PAY TO THE ORDER OF Pete du Pont for President $ 1000 XX

THE SUM I OOO DOLS OO CTS DOLLARS

CHEMICAL BANK
640 Madison Avenue
New York, N.Y. 10022

FOR Contribution

H R Kravis

⑈0000100000⑈

⑆021000021⑆ 930400933418

HENRY R. KRAVIS
71 EAST 71ST STREET
NEW YORK, NY 10021

1595

1-12
210

June 1x 19 87

PAY TO THE ORDER OF Senator Danforth $ 1000 ~~00~~

THE SUM 1 000 DOLS 00 CTS DOLLARS

CHEMICAL BANK
640 Madison Avenue
New York, N.Y. 10022

FOR Contributions

H R Kravis

"0000 100000"

930400933419

HENRY R. KRAVIS
71 EAST 71ST STREET
NEW YORK, NY 10021

1639

1-12
210

June 24 19 87

PAY TO THE ORDER OF Senator Alan Cranston $ 1,000 ZX

THE SUM ONE THOUSAND DOLS 00 CTS DOLLARS

CHEMICAL BANK
640 Madison Avenue
New York, N.Y. 10022

FOR contribution - presidential Henry R. Kravis

"0000100000"

930409334420

HENRY R. KRAVIS
71 EAST 71ST STREET
NEW YORK, NY 10021

2090

3400 3402 13 11-27/87 19 87 340802:01

PAY TO THE ORDER OF Metzenbaum for Senate $ 2000.00

THE SUM 2000 DOLS 00 CTS DOLLARS

CHEMICAL BANK
640 Madison Avenue
New York, N.Y. 10022

FOR Contribution

Henry Kravis

"0000 200000"

T — A

930400933421

HENRY R. KRAVIS
71 EAST 71ST STREET
NEW YORK, NY 10021

2184

11-12
210

11/24 1987

PAY TO THE ORDER OF Californians for Senator Pete Wilson $ 2000.00

THE SUM 2000 DOLS 00 CTS DOLLARS

CHEMICAL BANK
640 Madison Avenue
New York, N.Y. 10022

FOR Contribution

Henry Kravis

⑈0000 200000⑈

⑆930409334222

HENRY R. KRAVIS
71 EAST 71ST STREET
NEW YORK, NY 10021

CHI

2229

11-12
210

11/4 19 87

PAY TO THE ORDER OF Senator Lloyd Bentsen - Election Committee $ 1000 XX

THE SUM I 000 DOLS 00 CTS DOLLARS

CHEMICAL BANK
640 Madison Avenue
New York, N.Y. 10022

FOR Contribution

Henry R. Kravis

"0000 100000"

930400933423 1

HENRY R. KRAVIS
71 EAST 71ST STREET
NEW YORK, NY 10021

2271

1-12
210

7/11 19 87

PAY TO THE ORDER OF Senator Danforth $ 1000 xx

THE SUM 1000 DOLS 00 CTS DOLLARS

CHEMICAL BANK
640 Madison Avenue
New York, N.Y. 10022

FOR Contribution

H R Kravis

⑈0000100000⑈

⑆930400933424⑆

HENRY R. KRAVIS
71 EAST 71ST STREET
NEW YORK, NY 10021

2281

1-17
210

14 11 19 87

PAY TO THE ORDER OF Morgridge Committee $ 1000 00

THE SUM 1 0 0 0 DOLS 0 0 CTS DOLLARS

CHEMICAL BANK
640 Madison Avenue
New York, N.Y. 10022

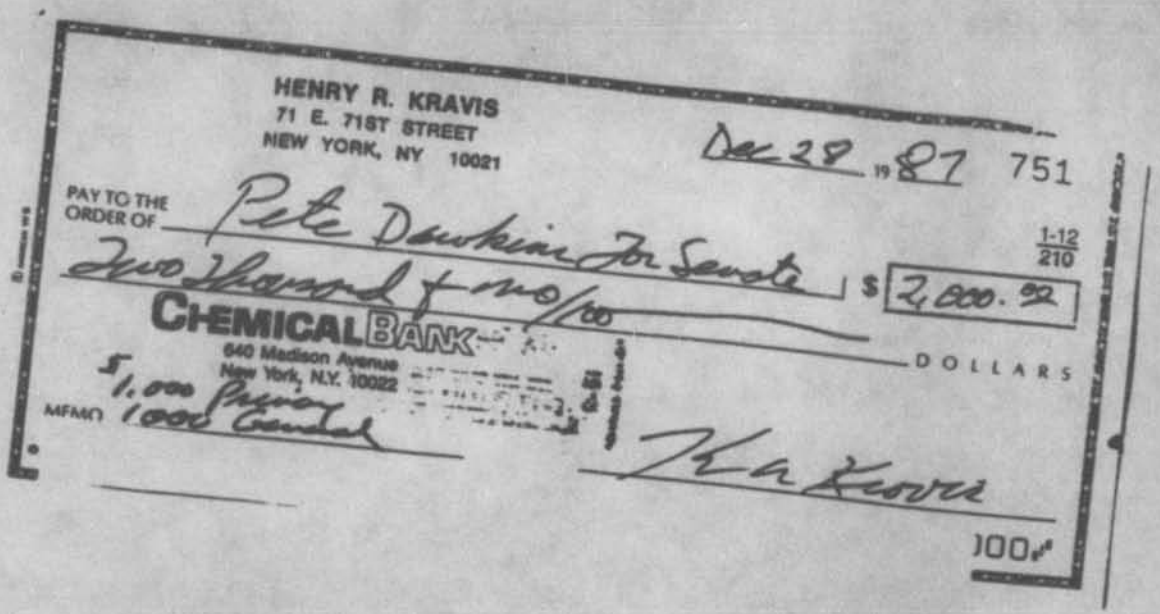
FOR Contribution

Henry Kravis

⑈0000 100000⑈

⑆—⑆

930409333425



HENRY R. KRAVIS
71 E. 71ST STREET
NEW YORK, NY 10021

Dec 28 19 87 751

PAY TO THE ORDER OF Pete Dawkins For Senate

1-12
210

Two Thousand + no/100 $ 2,000.92

DOLLARS

CHEMICAL BANK
640 Madison Avenue
New York, N.Y. 10022

MEMO $1,000 Primary
$1,000 General

Ira Kravis

⑈100⑈

930400933426

HENRY R. KRAVIS
71 EAST 71ST STREET
NEW YORK, NY 10021

2340

FROIT

Jan 11 19 88

PAY TO THE ORDER OF DUKAKIS FOR PRESIDENT $ 1,000 XX

THE SUM 1000 DOLS 00 CTS DOLLARS

CHEMICAL BANK
540 Madison Avenue
New York, N.Y. 10022

FOR Contribution

Henry Kravis

"0000 1000 00"

930400933427

HENRY R. KRAVIS
71 EAST 71ST STREET
NEW YORK, NY 10021

2590

Feb 16 1966

PAY TO THE ORDER OF Nat. Republican County Committee $ 5000 00

THE SUM 5000 DOLS 00 CTS DOLLARS

CHEMICAL BANK
640 Madison Avenue
New York, N.Y. 10022

FOR Contribution

Henry R. Kravis

⑈0000500000⑈

⑆930409334228

HENRY R. KRAVIS
71 EAST 71ST STREET
NEW YORK, NY 10021

MAR 1 [illegible] 492 2674

1-12
210

3/3 1985

PAY TO THE ORDER OF Eagleton for U.S. Senate Committee $ 1000 XX

THE SUM I OOO DOLS OO CTS DOLLARS

CHEMICAL BANK
640 Madison Avenue
New York, N.Y. 10022

FOR Contribution

Henry R. Kravis

"0000 100090"

E — A

930400933429

HENRY R. KRAVIS
71 EAST 71ST STREET
NEW YORK, NY 10021

2615

1-17/210

Feb 24 19 88

PAY TO THE ORDER OF Negroponte Committee $ 1000 XX

THE SUM 1 OOO DOLS OO CTS DOLLARS

CHEMICAL BANK
640 Madison Avenue
New York, N.Y. 10022

FOR Contribution

H R Kravis

"0000 100000"

930400933430

HENRY R. KRAVIS
71 EAST 71ST STREET
NEW YORK, NY 10021

2748

1-12
210

3/14 19 88

PAY TO THE ORDER OF Fund for American Future $ 5000 XX

THE SUM 5000 DOLS 00 CTS DOLLARS

CHEMICAL BANK
640 Madison Avenue
New York, N.Y. 10022

FOR Contribution

H R Kravis

⑈0000500000⑈

⑆930400933443 31⑆

HENRY R. KRAVIS
71 E. 71ST STREET
NEW YORK, NY 10021

3077

May 16 19 88

PAY TO THE ORDER OF David Kearns $ 1000 no

THE SUM 1000 DOLS 00 CTS DOLLARS

CHEMICAL BANK
640 Madison Avenue
New York, N.Y. 10022

FOR Campaign '88

Henry Kravis

⑈0000 100000⑈

⑆930409333432⑆

HENRY R. KRAVIS
71 E. 71ST STREET
NEW YORK, NY 10021

3048

1-12
210

May 18 19 88

PAY TO THE ORDER OF Rick Montaya for Senate $ 1000 00

THE SUM 1000 DOLS 00 CTS DOLLARS

CHEMICAL BANK
640 Madison Avenue
New York, N.Y. 10022

FOR Contribution

H. R. Kravis

"0000 100000"

930400933433

D182

HENRY R. KRAVIS
71 E. 71ST STREET
NEW YORK, NY 10021

2953

12
210

January 19 88

PAY TO THE ORDER OF People for John Heinz $ 1000 ~~00~~

THE SUM One Thousand DOLS 00 CTS DOLLARS

CHEMICAL BANK
640 Madison Avenue
New York, N.Y. 10022

FOR Contribution

Henry R. Kravis

0000 100000

930409334434

Seiz

HENRY R. KRAVIS
71 E. 71ST STREET
NEW YORK, NY 10021

3062

1-12
210

May 22 19 88

PAY TO THE ORDER OF People for John Heinz Committee $ 1000 ^{00}/_{xx}

THE SUM I ○○○ DOLS ○○ CTS DOLLARS

CHEMICAL BANK
640 Madison Avenue
New York, N.Y. 10022

FOR Contribution

Henry Kravis

⑈0000 100000⑈

⑆930409334435

HENRY R. KRAVIS
71 E. 71ST STREET
NEW YORK, NY 10021

3076

May 5 19 86

PAY TO THE ORDER OF Malcolm Wallop $ 1000 ZZ

THE SUM I OOO DOLS OO CTS DOLLARS

CHEMICAL BANK
640 Madison Avenue
New York, N.Y. 10022

326755305

FOR Campaign '88 Henry Kravis

⑈0000 100000⑈

⑆930400933436⑆

HENRY R. KRAVIS
71 E. 71ST STREET
NEW YORK, NY 10021

3131

1-12
210

June 8 19 88

PAY TO THE ORDER OF Republican Senatorial Trust $ 5000

THE SUM 5 0 0 0 DOLS 0 0 CTS DOLLARS

CHEMICAL BANK
640 Madison Avenue
New York, N.Y. 10022

FOR Pledge-Contribution - Pd in full

H R Kravis

⑈0000500000⑈

⑆ 930409334437

HENRY R. KRAVIS
71 E. 71ST STREET
NEW YORK, NY 10021

3013

May 10 19 86

PAY TO THE ORDER OF Senate Majority Fund P.A.C. $ 5000 =

THE SUM 5000 DOLS 00 CTS DOLLARS

CHEMICAL BANK
540 Madison Avenue
New York, N.Y. 10022

FOR Contribution

Henry R. Kravis

"0000500000"

930400933438

HENRY R. KRAVIS
71 E. 71ST STREET
NEW YORK, NY 10021

3194

1-12
210

June 24 1988

PAY TO THE ORDER OF Presidential Trust $ 10,000 00

THE SUM 10000 DOLS 00 CTS 40052597 DOLLARS

CHEMICAL BANK
640 Madison Avenue
New York, N.Y. 10022

FOR Contribution

H R Kravis

⑈000 10000⑈00⑈

⑆930409334339

HENRY R. KRAVIS
71 E. 71ST STREET
NEW YORK, NY 10021

3429

Aug 31 19 92

PAY TO THE ORDER OF Governor Bell of New Jersey $ 25.000

THE SUM 25000 DOLS 00 CTS DOLLARS

CHEMICAL BANK
640 Madison Avenue
New York, N.Y. 10022

FOR Contribution

Henry R. Kravis

"000 2500000"

930400933440

HENRY R. KRAVIS
71 E. 71ST STREET
NEW YORK, NY 10021

3078

1-112
210

May 16 19 88

PAY TO THE ORDER OF Pete Wilson $ 1000

THE SUM I OOO DOLS OO CTS DOLLARS

CHEMICAL BANK
640 Madison Avenue
New York, N.Y. 10022

FOR Campaign '88

Henry Kravis

⑈0000 100000⑈

⑆930400⑆ 33441

HENRY R. KRAVIS

1008

112
210

Sept. 20 19 88

PAY TO THE ORDER OF Victory '88 $ 1000 XX

THE SUM I OOO DOLS OO CTS DOLLARS

CHEMICAL BANK
PRIVATE BANKING
30 Rockefeller Plaza
New York, New York 10112

FOR Contribution

Henry R. Kravis

"0000 100000"

"930400933442

HENRY R. KRAVIS

1057

1-12
210

Sept 19 1988

PAY TO THE ORDER OF Leth Senate Committee $ 1000 xx

THE SUM I OOO DOLS OO CTS DOLLARS

CHEMICAL BANK
PRIVATE BANKING
30 Rockefeller Plaza
New York, New York 10112

FOR Contributions

Henry R. Kravis

⑈0000 100000⑈

⑆021000021⑆ 930400933443

HENRY R. KRAVIS
71 EAST 71ST STREET
NEW YORK, NY 10021

2051

Oct. 27 19 87

PAY TO THE ORDER OF Hoagland for Congress - Committee $ 250 00

THE SUM 250 DOLS 00 CTS DOLLARS

CHEMICAL BANK
640 Madison Avenue
New York, N.Y. 10022

FOR Contribution

Henry Kravis

"000002 5000"

930400 933444

HENRY R. KRAVIS
71 EAST 71ST STREET
NEW YORK, NY 10021

2864

April 15 1988

PAY TO THE ORDER OF Mayoralty Committee $ 1000 ^^

THE SUM I OOO DOLS OO CTS DOLLARS

CHEMICAL BANK
640 Madison Avenue
New York, N.Y. 10022

: 0142 :

FOR Contribution

Henry Kravis

:0000100000:

930400933446

EXHIBIT "B"

9304093344446

Henry Kravis Refunds or Redesignations

	Amount	Date of Check	Candidate/Committee
Refund	$5,000	04/06/90	NRSC
Redesig-nation	$5,000	04/10/90	NY Rep Co Cmte
Refund	$5,000	04/20/90	Fd for Amer Future
Refund	$10,000	04/30/90	RNC Pres Trust
Redesig-nation	$5,000	05/22/90	NJ Rep State Cmte
Refund	$5,000	06/15/90	Senate Maj Fund
Refund	$1,000	09/20/90	Wilson Re-Elect Cmte
TOTAL REFUNDS - OR REDESIGNATIONS	$36,000		
ADJUSTED GRAND TOTAL	$23,961		

93040933447

DANIEL P. MOYNIHAN
NEW YORK

United States Senator
WASHINGTON, D.C. 20510

July 12, 1990

Dear Ken:

As promised, enclosed are copies of the FEC form filings concerning contributions made by Henry Kravis and Carolyn Roehm.

Yours truly,

Joe

Joseph H. Gale
Chief Counsel

Kenneth S. Levine, Esq.
Wunder, Ryan, Cannon & Thielen
1615 L Street, NW
Washington, DC 20036

Enclosure

(Paid for by The Moynihan Committee)

9304093344 8

THE MOYNIHAN COMMITTEE, INC.

V

REQUEST FOR ADDITIONAL DATA REQUIRED
BY THE FEDERAL ELECTION COMMISSION

We thank you very much for your contribution but we need some additional data so we can prepare the reports required by the Federal Election Commission.

Please take a few minutes to -(1) fill in any missing information and (2) affix your authorization signature(s), and (3) mail this back to us.

Name Mr. Henry R. Kravis

Address 71 East 71st Street

New York, NY 10021

Telephone 212-230-9403.

Name of Employer Kohlberg Kravis

Occupation Partner

Primary $1000 General $1000

Spouse Name Carolyne

Address Same

Telephone

Name of Employer X CAROLYNE ROEHM, INC.

Occupation X FASHION DESIGNER

Primary $289 General

Unless otherwise indicated this is to authorize that my contributions to date should first be allocated to the primary election to the extent allowed by law and the remainder be then allocated to the general election to the extent allowed by law.

Further, unless otherwise indicated, this is also to authorize the equal split of any joint spouse contributions and once split equally the allocation between the primary and general elections is to follow the authorization rules stated in the prior paragraph.

Signature X [signature] Date April 26-88

Spouse* Signature X Carolyne Roehm Date May 4, 1988.

(*Spouse signature required to split spouse contributions)

A stamped return envelope is included for your convenience.

Thank you.

THE MOYNIHAN COMMITTEE, INC. ✓

REQUEST FOR ADDITIONAL DATA REQUIRED
BY THE FEDERAL ELECTION COMMISSION

We thank you very much for your contribution but we need some additional data so we can prepare the reports required by the Federal Election Commission.

Please take a few minutes to - (1) fill in any missing information and (2) affix your authorization signature(s), and (3) mail this back to us.

Name Henry R. Kravis	Spouse Name Carolyne Roehm
Street Address 11 East 71st St.	Street Address
City, State, Zip N.Y. NY 10021	City, State, Zip
Telephone	Telephone
Name of Employer Kohlberg Kravis Roberts	Name of Employer
Occupation Partner	Occupation Designer
Primary 1000 General $1000	Primary 1000 General 289

Unless otherwise indicated this to authorize that my contributions to date should first be allocated to the primary election to the extent allowed by law and the remainder be then allocated to the general election to the extent allowed by law.

Further, unless otherwise indicated, this is also to authorize the equal split of any joint spouse contributions and once split equally the allocation between the primary and general elections is to follow the authorization rules stated in the prior paragraph.

Signature X Henry Kravis Date June 24, 1988

Spouse* Signature X [illegible] Date _____

(*Spouse signature required to split spouse contributions)

A stamped return envelope is included for your convenience.

Thank You.

THE MOYNIHAN COMMITTEE, INC.

REQUEST FOR ADDITIONAL DATA REQUIRED
BY THE FEDERAL ELECTION COMMISSION

We thank you very much for your contribution but we need some additional data so we can prepare the reports required by the Federal Election Commission.

Please take a few minutes to - (1) fill in any missing information and (2) affix your authorization signature(s), and (3) mail this back to us.

Name Henry R. Kravis	Spouse Name
Street Address 71 E 71st St.	Street Address
City, State, Zip NY NY 10021	City, State, Zip
Telephone	Telephone
Name of Employer Kohlberg Kravis Roberts Co	Name of Employer
Occupation Partner	Occupation
Primary $1000 General 289	Primary General

$289 Partnership Check 1986

Unless otherwise indicated this to authorize that my contributions to date should first be allocated to the primary election to the extent allowed by law and the remainder be then allocated to the general election to the extent allowed by law.

Further, unless otherwise indicated, this is also to authorize the equal split of any joint spouse contributions and once split equally the allocation between the primary and general elections is to follow the authorization rules stated in the prior paragraph.

Signature X Henry Kravis Date 9/4/87

Spouse* Signature _____ Date _____

(*Spouse signature required to split spouse contributions)

A stamped return envelope is included for your convenience.

Thank You.

National Republican Senatorial Committee

SENATOR DON NICKLES
CHAIRMAN

DOYCE BOESCH
EXECUTIVE DIRECTOR

April 6, 1990

Mr. Paul Sullivan
Wunder, Ryan, Cannon & Thelen
1615 L Street, NWs Suite 650
Washington, DC 20036

Dear Paul,

Per our telephone discussion of 4/6/90, please find enclosed a check from our Federal account for a contribution refund to Mr. Henry Kravis.

The refund is for a donation received by the National Republican Senatorial Committee on June 20, 1988.

If Mr. Kravis wishes to contribute to our Non-Federal account, please make check payable to NRSC/Non-Federal and send to my attention.

Please thank Mr. Kravis for his continued support of our Republican candidates. If you have any questions, call me at 202/675-4291.

Respectfully,

James L. Hagen

James L. Hagen
Treasurer

RONALD REAGAN REPUBLICAN CENTER
425 SECOND STREET, N.E. ● WASHINGTON, D.C. 20002 ● (202) 675-6000

PAID FOR AND AUTHORIZED BY THE NATIONAL REPUBLICAN SENATORIAL COMMITTEE.

9304093452

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 WYTO-4 V-2

DATE	DESCRIPTION	AMOUNT
4-6-90	Contribution Refund (6/20/88) (Federal)	$5,000.00

NATIONAL REPUBLICAN
SENATORIAL COMMITTEE
425 SECOND STREET, N.E.
WASHINGTON, DC 20002

SIGNET BANK
Arlington, VA Virginia

33640

April 6 1990

68-408/560 475

PAY *Five Thousand and 00/100********** DOLLARS $*5,000.00*

TO THE ORDER OF
Henry R. Kravis
9 West 57th Street
New York, NY 10019

James L. Hagen

⑈00033640⑈ ⑆056004089⑆ 651⑈7172927⑈

DELUXE CHECK PRINTERS

9309335

Paul D. Tvetenstrand
527 West 110 Street, Apt 74
New York, New York 10025

April 10, 1990

Mr. Kenneth S. Levine
Wunder, Ryan, Cannon & Thelen
1615 L Street, N.W.
Suite 650
Washington, D.C. 20036

Dear Mr. Levine:

As you suspected, the $5,000 contribution to the New York Republican County Committee that was made by Mr. Henry R. Kravis in early 1988 was deposited into the Committee's federal account. As per your request we have transferred that contribution to our state account and will reflect such transfer on our disclosure filings.

If I may be of any further assistance, please give me a call at (212)912-7452.

Sincerely,

Paul D. Tvetenstrand

9304093454

THE FUND FOR AMERICA'S FUTURE

April 20, 1990

Mr. Kenneth S. Levine, Esq.
Wunder, Ryan, Cannon & Thelen
1615 L Street, N.W.
Suite 650
Washington, D.C. 20036

Dear Mr. Levine:

In accordance with your letter of April 13, 1990, please find enclosed a check made payable to Mr. Henry R. Kravis in the amount of $5,000. This check represents a refund of the contribution made by Mr. Kravis to The Fund for America's Future on March 21, 1988.

It is my understanding that Mr. Kravis has specifically requested this refund.

Sincerely,

Roy G. Hale
Treasurer

RGH/he
Enclosure/check

9304093345 5

Current address: P.O. Box 2634, La Plata, MD 20646

1200 18TH STREET, N.W., SUITE 300, WASHINGTON, D.C. 20036 (202) 842-1987

Paid for by The Fund For America's Future.

THE FUND FOR AMERICA'S FUTURE
1200 18th Street, N.W., Washington, D.C. 20036

The RIGGS NATIONAL BANK
of Washington, D.C.
20th & L Office
1550 L Street, N.W.

009937

CHECK NO.

Five Thousand Dollars and 00/100

DATE
4/20/90

AMOUNT
$5,000.00

PAY TO THE ORDER OF
Mr. Henry R. Kravis
9 West 57th Street
New York, NY

AUTHORIZED SIGNATURE

⑈009937⑈ ⑆054000030⑆ 23⑈0847916 7⑈

930409334456

REPUBLICAN NATIONAL FINANCE COMMITTEE
310 FIRST STREET, SE.
WASHINGTON, D.C. 20003

2495

April 30 19 90 52-421/550 475

PAY TO THE ORDER OF MR. HENRY R. KRAVIS $ 10,000.00***

TEN THOUSAND AND 00/100 DOLLARS

Bank of Virginia
1755 South Jefferson Davis Highway
Arlington, Virginia 22202

FOR 1988 REFUND

Pat Hughes Treasurer

⑈0000 2495⑈ ⑆056004089⑆ 651⑈ 7220643⑈

9304093345

THE REPUBLICAN
Governor's Club

Roger A. Bodman
Chairman

Trustees:
Lawrence E. Bathgate, II
S. Rodgers Benjamin
Cheryl F. Halpern
Mark L. Husik

May 23, 1990

Kenneth S. Levine
Wunder, Ryan, Cannon & Thelen
1615 L Street, N.W.
Suite 650
Washington, DC 20036

93040933458

Re: Henry R. Kravis

Dear Mr. Levine:

Pursuant to our telephone conversation and your request, I have transferred $5,000 attributed to Henry Kravis from the "Victory-88" Federal account into the New Jersey Republican State Committee State account on May 23, 1990. A copy of the check and deposit receipt are enclosed for your convenience. I hope this action resolves this situation to your satisfaction.

If you require further documentation or additional information, please do not hesitate to contact me.

Sincerely yours,

Rona L Goldberg

RONA L. GOLDBERG
Executive Director

RLG/trv
Enclosure

DATE 5-22-90

CURRENCY

COIN

CHECKS 5000

U.J.B./ CENTRAL, N.A. 06-215

1990 MAY 23 AM 10 34

U.J.B./M.A.

1

5000

TOTAL ITEMS 1

Checks and other items are received for deposit subject to the provisions of the Uniform Commercial Code or any applicable collection agreement.

DEPOSITS MAY NOT BE AVAILABLE FOR IMMEDIATE WITHDRAWAL

5000 -

NJ REPUBLICAN STATE COMM.
GOVERNOR'S BALL

ADDRESS

CITY & STATE ZIP

United Jersey Bank
CENTRAL, N.A.
150 W. State Street
Trenton, N.J. 08608

⑆031203054⑆ 32⑈50066⑈2⑈ 0003

VICTORY "88"
310 WEST STATE ST.
TRENTON, NJ 08618

2442

5-22 19 90

55-305/312

PAY TO THE ORDER OF New Jersey Republican State Committee $ 5,000.00

Five thousand & no/100 DOLLARS

United Jersey Bank
CENTRAL, N.A.
150 W. State Street
Trenton, N.J. 08608

FOR Transfer of funds - Henry Travis

Robert D. Bain

⑈002442⑈ ⑆031203054⑆ 906⑈70004 3⑈

289

SENATE MAJORITY FUND
1211 CONNECTICUT AVE., N.W., SUITE 700
WASHINGTON, DC 20036

15-3/540

6-15 19 90

Pay To the Order of Henry R Kravis $ 5000 00

Five thousand xx Dollars

RIGGS
The Riggs National Bank of Washington, D.C.

For Refund

Signature Patricia Suffin

"000289" :054000030: 26"0858 3925"

930400 3346 0

MILLER/ROOS & COMPANY
POLITICAL REPORTING CONSULTANTS

DATE: September 20, 1990

TO: Paul Sullivan

FROM: Chris Miller

RE: Californians for Pete Wilson contribution

- -

I have spoken with the Treasurer of the Californians for Pete Wilson committee, Mr. Larry Scott, on July 25, 1990 and on September 18, 1990 regarding the September 19, 1988 contribution by Henry Kravis to the Wilson Campaign. He has confirmed to me that a $1,000 refund is being issued by the Wilson campaign to Mr. Kravis.

In addition, I had informed him that we would pick up the refund when it was ready. I will forward the refund check to you immediately upon receiving it.

9304093346 1

BEFORE THE FEDERAL ELECTION COMMISSION

In The Matter of	)	
Raymond Kravis	)	**MUR 3104**
	)	

I.

INTRODUCTION

On August 23, 1990, Raymond Kravis (hereinafter "Kravis" or "Respondent") received notice the Federal Election Commission (hereinafter "FEC" or "Commission") had found reason to believe that pursuant to 2 U.S.C. §437g(a)(2), the Respondent had exceeded his annual contribution limit in violation of 2 U.S.C. §441a(a)(3).

On August 30, 1990 the Respondent requested a fifteen (15) day extension of time in which to respond. In a letter dated September 12, 1990 the Commission granted the Respondent's request. This response is filed in accordance with the September 21, 1990 extension.

The Commission, in its reason to believe ("RTB") notice dated August 17, 1990, requested that Respondent provide to the Commission with a list of contributions, including those of less than $500 that he made to federal candidate's and committees for the 1988 election cycle. Documentation for those contributions was also requested. Those documents and list of contributions are provided herein to the Commission pursuant to its request. In addition, the Respondent has set forth corrections and clarifications of the contributions which the FEC record attributes to Respondent.

9304093346 2

II.

DOCUMENTATION AND ANALYSIS

OF RESPONDENT'S 1988 CONTRIBUTIONS

Included in the Commission's RTB notice to Respondent is the allegation that Respondent made a total of $8,750 in contributions which were in excess of the $25,000 annual limit set forth at of 2 U.S.C. §441a(a)(3). Attached hereto at Exhibit "A", are copies of the checks and a corresponding summary list reflecting the contributions made for the 1988 election cycle. Contrasting those records with the Commission's records, there are several discrepancies which require clarification. Taking into consideration the adjustments based on the Respondent's records, and refunds which he has obtained as of this date, Respondent's 1988 aggregate contributions are now within the $25,000 annual limit.

1. NRSC Contributions:

The Commission's records reflect a total of $6,000 of contributions having been made by Respondent to the National Republican Senatorial Committee ("NRSC"). However, the Respondent's records do not show any such contributions being made. The contributions listed in the FEC's records indicate six separate $1,000 contributions to the NRSC; one made on April 20th, 1988, two such contributions made on May 31, 1988 and three such contributions made on June 9, 1988.

These contributions, as reported on the FEC record, appear to be the result of a double entry. The Respondent made six $1,000 contributions directly to 1988 candidates, and those contribution checks were apparently delivered to the NRSC. The checks were made payable to the respective

9304093346 63

principle campaign committees of the Senate candidates, however, the Commission should note that the face of each check has stamped on it, "Member of Senatorial Trust". The six checks in question are the following:

1. Check #5233 payable to People for Heinz
2. Check #5340 payable to Friends of Connie Mack
3. Check #5339 payable to Durenberger '88 Committee
4. Check #5406 payable to Slade Gorton for Senate
5. Check #5401 payable to Friends of Lugar
6. Check #5405 payable to John Chaffee for Senate

The fact that the six contribution checks in question were made payable to the principle campaign committees of the Senate candidates and not to the NRSC, mandates that the contributions only be attributed to the limits of the respective Senate campaigns. Also, notwithstanding the fact that the contributions were apparently delivered to the NRSC to be passed on to the principle campaign committees, such contributions must only be counted once for purposes of the §441a(a)(3) limits.

2. Republican Congressional Boosters Club:

Check #1699 for $1,500 dated February 23, 1988 was for a dinner dance sponsored by the Boosters Club and attended by the Respondent and his spouse. The charge for the dinner was $750 each. Therefore, as reflected on the FEC records, $750 was attributed to the Respondent and $750 to his spouse.

9304093364

3. Metzenbaum for Senate:

Check #1702 in the amount of $4,000 dated February 29, 1988, notes a memo entry that it is a contribution from Respondent and his spouse to Metzenbaum for Senate. It was also designated $1,000 each for the primary and $1,000 each for the general election and reported as such.

4. 1986 and 1987 Contributions Attributable to 1988 Limit:

There was a total of $1,200 in contributions made to candidates during 1986 and 1987 who were seeking election in the 1988 cycle. A summary of these checks, the amount, and date are attached hereto at Exhibit "B".

5. 1988 Contributions of Less Than $500:

There was a total of $1,350 in contributions of less than $500 which are required to be attributed to the 1988 election cycle. A listing of these checks, the amount, and the date of the check are attached hereto at Exhibit "B".

6. Spouse's Contributions Attributed:

A review of Respondent's records indicates that there were two contributions issued on the account of Raymond Kravis but attributed to Mrs. Kravis. The first check, #5635 in the amount of $200 dated August 22, 1988 was made payable to Friends of Jim Inhofe. A copy of the check and the accompanying notice attributing the contribution to Mrs. Kravis is attached hereto at Exhibit "C". Similarly, check #5673 signed by Respondent and made payable to Keyes for U.S. Senate was transmitted to the Keyes committee with a note indicating that the check represented a contribution from Mrs. Kravis.

93040933465

Given the written documentation which accompanied these checks, and the fact that Mrs. Kravis had signator authority on the account, these two contributions should be attributed to Mrs. Kravis rather than to the Respondent.

7. Dole For President:

Check #5383 in the amount of $250 dated June 1, 1988 payable to the Dole for President Committee was timely reattributed by Mr. Kravis to Mrs. Kravis. This reattribution was appropriately reflected on the Dole for President Committee's FEC report. See letter from Dole Committee attached hereto at Exhibit "D".

Financial Summary:

The Respondent's records indicate a total of $31,000 in contributions attributable to the 1988 election cycle. This represents the adjustments from the recorded NRSC contributions, the 1986 and '87 contributions attributable to the '88 election cycle, the 1988 contributions of less than $500 and the two contributions attributed to Bessie Kravis. In the latter situation, the Respondent contends these were appropriately attributed to the Respondent's spouse, however, they are included in these financial figures only out of extreme caution for determing the appropriate refunds referenced below.

Refunds:

The Respondent has received two refund checks amounting to $6,800 representing funds from the 1988 election cycle. With this refund, the

9304093334666

Respondent's aggregate contributions for the 1988 election cycle amount to $24,200. Copies of the two reimbursement checks from the Republican National Committee are attached hereto at Exhibit "E".

CONCLUSION

The documents and information included in this response are provided to the Commission pursuant to its request for documentation. If there is further information which you require, please contact us at your earliest convenience.

Respectfully submitted,

Wunder, Ryan, Cannon and Thelen

By: _____
Kenneth S. Levine
Paul E. Sullivan, Counsel
for Respondent

cc: Chairman Elliott
Vice-Chairman McGarry
Commissioner Aikens
Commissioner Josefiak
Commissioner McDonald
Commissioner Thomas

9304093334667

9304093334668

EXHIBIT "A"

RAYMOND KRAVIS

FEC Listed Contributions

Check #	Amount	Date of Check	Candidate/Committee
4055	$750	08/05/86	The Vice President's Exploratory Account
1634	$1,000	03/09/87	Du Pont, Pete Pres
1631	$1,000	02/28/87	Kemp, Jack for Pres
4565	$1,000	05/19/87	Dole for Pres
1694	$500	02/11/88	Gephardt for Pres
1699	$1,500*	02/23/88	Rep Cong Boosters Club
1702	$4,000**	02/29/88	Metzenbaum for Senate
1701	$500	03/10/88	Inhofe, Jim Fr of
1705	$500	03/21/88	Johnston II, Harry A.
5233	$1,000	04/11/88	Heinz, John Peo For
5340	$1,000	05/20/88	Mack, Connie Fr of
5408	$4,000	06/03/88	NRSC
5339	$1,000	05/20/88	Durenberger 88
5406	$1,000	06/03/88	Gorton, Slade Fr of
5401	$1,000	06/03/88	Lugar, Dick Fr of
5405	$1,000	06/03/88	Chafee for Senate
5415	$10,000	06/08/88	RNC Presidential Trust
TOTAL:	$30,750		

930409334469

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* Contribution was for dinner dance for two; $750 charged to Raymond Kravis, $750 to Bessie Kravis (wife)

** Memo on check explains contribution made for Bessie and Raymond Kravis. Therefore, contribution is divided as follows: Raymond Kravis, $1,000 for primary election, $1,000 for general election; Bessie Kravis, $1,000 for primary election, $1,000 for general election.

1986 and 1987 Contributions
Less Than $500 Attributable to 1988 $25,000 Limit

Check #	Amount	Date of Check	Candidate/Committee
1364	$250	01/06/86	Friends of Dick Lugar
1446	$250	01/27/87	The Vice President's Exploratory Account
4637	$100	06/03/87	Friends of Dick Lugar
4927	$100	09/14/87	Friends of Dick Lugar
5067	$250	10/19/87	Friends of Dick Lugar
5193	$250	11/13/87	Friends of Jim Inhofe
TOTAL:	$1,200		

1988 Contributions Less Than $500

Check #	Amount	Date of Check	Candidate/Committee
5198	$100	04/05/88	RNC
5305	$250	04/25/88	Reid Moore for Congress
5383	$250	06/01/88	Dole for President
5416	$350	06/08/88	Synar for Congress
5918	$400	11/15/88	NRCC
TOTAL:	$1,350		

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Checks Less Than $500 Attributed to Bessie Kravis But Signed By Raymond Kravis on Raymond Kravis' Account

Check #	Amount	Date of Check	Candidate/Committee
5635	$200	08/22/88	Friends of Jim Inhofe
5673	$250	08/30/88	Keyes for Senate
TOTAL:	$450		
GRAND TOTAL:	$33,750 - 2,750 $31,000	Grand Total should be reduced by $2,750 because of the $2,000 Metzenbaum contribution and the $750 Republican Congressional Boosters Club contributions previously footnoted.	

Raymond Kravis Refunds

Check #	Amount	Date of Check	Candidate/Committee
2510	$4,300	09/17/90	RNC Presidential Trust
2515	$2,500	09/18/90	RNC Presidential Trust
TOTAL REFUNDS:	$6,800		

TOTAL CONTRIBUTIONS:	$31,000
TOTAL REFUNDS:	6,800
ADJUSTED 1988 CONTRIBUTIONS:	$24,200

93040933471

RAYMOND F. KRAVIS
1804 - 1ST NAT'L BLDG.
TULSA, OKLA. 74103

634

Nov 9 1987

86-3
1030

PAY TO THE ORDER OF Pete du Pont for President Campaign $1,000 00/100

One Thousand and 00/100 DOLLARS

MAR 19 87

BANK OF OKLAHOMA
P.O. Box 2300
Tulsa, Oklahoma 74102

MEMO Contribution

Raymond F. Kravis

⑈0000 100000⑈

930409334472

RAYMOND F. KRAVIS
1604 FIRST NATIONAL BUILDING
TULSA, OKLAHOMA 74103 . . .

BANK OF OKLAHOMA
TULSA, N.A.

4055

PAY

RAYMOND F. KRAVIS 750 DOLS 00 CTS

August 5, 1986
DATE

$750.00
AMOUNT

TO THE ORDER OF The Vice President's Exploratory Account

PAID MS&T BANK

RAYMOND F. KRAVIS

Raymond F. Kravis

"00000 75000"

930400933347

RAYMOND F. KRAVIS
1804 - 1ST NAT'L BLDG.
TULSA, OKLA. 74103

1631

Feb. 28 1987

86-3
1039

PAY TO THE ORDER OF Jack Kemp for President $ 1,000 00

One Thousand and no 100 DOLLARS

BANK OF OKLAHOMA
P.O. Box 2300
Tulsa, Oklahoma 74192

Contribution

Raymond F. Kravis

'0000100000'

930409334474

RAYMOND F. KRAVIS
1804 FIRST NATIONAL BUILDING
TULSA, OKLAHOMA 74103 . . .

BANK OF OKLAHOMA
TULSA, N.A.

36

4565

PAY ONE THOUSAND DOLS 00 CTS

May 19, 1987
DATE

$1,000.00
AMOUNT

TO THE ORDER OF Bob Dole for President

10 RAYMOND F. KRAVIS

Raymond F. Kravis

01 DOKS

"0000 100000"

930340933347

RAYMOND F. KRAVIS
1804 - 1ST NAT'L BLDG.
TULSA, OKLA. 74103

1694

Feb. 11 1988

86-3
1039

PAY TO THE ORDER OF Dephards for Friends of Committee $ 500 00/100

Five Hundred and no DOLLARS

BANK OF OKLAHOMA
P.O. Box 2300
Tulsa, Oklahoma 74192

OK62

Contribution

Raymond F. Kravis

#000005000#

930409334776

1699

RAYMOND F. KRAVIS
1804 - 1ST NAT'L BLDG.
TULSA, OKLA. 74103

Feb. 23 19 88

88-3
1039

PAY TO THE ORDER OF Republican Congressional Booster Club $ 1,500 00

Fifteen Hundred and no/100 DOLLARS

BANK OF OKLAHOMA
P.O. Box 2300
Tulsa, Oklahoma 74192

CANCELED

MEMO Contribution

Raymond F. Kravis

000150000

930409334477

RAYMOND F. KRAVIS
1800 [illegible] NAT'L BLDG.
TULSA, OKLA. 74103

1702

[illegible] 19 88 13005 95

88-3
1030

PAY TO THE ORDER OF Metzenbaum For Senate $ 4000 00

Four Thousand [illegible] DOLLARS

MAR 13 [illegible]

BANK OF OKLAHOMA
P.O. Box 2300
Tulsa, Oklahoma 74192

MEMO For David L. + Raymond F. Kr

Raymond F. Kravis

⑈004000000⑈

930409334478

5408

RAYMOND F. KRAVIS
1804 FIRST NATIONAL BUILDING
TULSA, OKLAHOMA 74103 . . .

BANK OF OKLAHOMA
TULSA

PAY RAYMOND F. KRAVIS 4000 DOLS 00 CTS June 3, 1988 $4,000.00
AMOUNT

TO THE ORDER OF National Republican Senatorial Committee

RAYMOND F. KRAVIS

Raymond F. Kravis

⑈0000400000⑈

⑆3304093347

5339

RAYMOND F. KRAVIS
1604 FIRST NATIONAL BUILDING
TULSA, OKLAHOMA 74103 . . .

MEMBER OF SENATORIAL TRUST

BANK OF OKLAHOMA
TULSA

86-1

PAY RAYMOND F. KRAVIS I OOO DOLS OO CTS

May 20, 1988
DATE

$1,000.00
AMOUNT

TO THE ORDER OF Durenberger '88 Re-election Committee

RAYMOND F. KRAVIS

Raymond F. Kravis

CANCELLED

⑈0000100000⑈

⑆307040933348⑆

RAYMOND F. KRAVIS
1804 FIRST NATIONAL BUILDING
TULSA, OKLAHOMA 74103 . . .

MEMBER OF
SENATORIAL
TRUST

BANK OF OKLAHOMA
TULSA

5406

PAY

RAYMOND F. KRAVIS 1000 DOLLARS 00 CTS

JUN

CANCELLED

June 3, 1988
DATE

$1,000.00
AMOUNT

TO THE ORDER OF

Slade Gorton for Senate

Raymond F. Kravis

"0000100000"

930409334

RAYMOND F. KRAVIS
1804 FIRST NATIONAL BUILDING
TULSA, OKLAHOMA 74103 . . .

MEMBER OF SENATORIAL TRUST

BANK OF OKLAHOMA
TULSA

5401

PAY

RAYMOND F. KRAVIS I 000 DOLLARS 00 CTS

June 3, 1988
DATE

$1,000.00
AMOUNT

TO THE ORDER OF

Friends of Dick Lugar

JUN 17 88

RAYMOND F. KRAVIS

Raymond F. Kravis

⑈0000100000⑈

⑆930409334⑆ 2

RAYMOND F. KRAVIS
1804 FIRST NATIONAL BUILDING
TULSA, OKLAHOMA 74103 . . .

MEMBER OF
SENATORIAL
TRUST

BANK OF OKLAHOMA
TULSA

PAY RAYMOND F. KRAVIS One Thousand Dollars CTS

June 3, 1988
DATE

$1,000
AMOUNT

TO THE ORDER OF Friends of Dick Lugar

JUN 17 88

RAYMOND F. KRAVIS

Raymond F. Kravis

#0000 10

930400933342

RAYMOND F. KRAVIS
1804 FIRST NATIONAL BUILDING
TULSA, OKLAHOMA 74103 . . .

MEMBER OF SENATORIAL TRUST

BANK OF OKLAHOMA
TULSA

5405

PAY RAYMOND F. KRAVIS ONE THOUSAND DOLS 00 CTS

June 3, 1988
DATE

$1,000.00
AMOUNT

TO THE ORDER OF John Chafee for Senate

RAYMOND F. KRAVIS

Raymond F. Kravis

⑈0000 100000⑈

3

DELUXE CHECK PRINTERS

930409334

5415

RAYMOND F. KRAVIS
1604 FIRST NATIONAL BUILDING
TULSA, OKLAHOMA 74103 . . .

BANK OF OKLAHOMA
TULSA

PAY RAYMOND F. KRAVIS ONE THOUSAND DOLS 00 CTS June 8 1988 $10,000.00
DATE AMOUNT

TO THE ORDER OF The Presidential Trust

JUN 24 1988

BANK OF OKLAHOMA

"RAYMOND F. KRAVIS

Raymond F. Kravis

"000 1000000"

DELUXE CHECK PRINTERS

9130409333 48

RAYMOND F. KRAVIS
1804 FIRST NATIONAL BUILDING
TULSA, OKLAHOMA 74103 . . .

MEMBER OF
SENATORIAL
TRUST

BANK OF OKLAHOMA
TULSA

5340

PAY RAYMOND F. KRAVIS ONE THOUSAND DOLS 00 CTS

May 20, 1988
DATE

$1,000.00
AMOUNT

TO THE ORDER OF Friends of Connie Mack

RAYMOND F. KRAVIS

Raymond F. Kravis

⑈0000 100000⑆

⑆930400933485⑈

1701

RAYMOND F. KRAVIS
1804 - 1ST NAT'L BLDG.
TULSA, OKLA. 74103

Mar 10 19 88

86-3
1039

PAY TO THE ORDER OF Friends of Jim Inhofe $ 500 00

Five Hundred and 00/100 DOLLARS

⑆1045285

BANK OF OKLAHOMA
P.O. Box 2300
Tulsa, Oklahoma 74192

MEMO

Raymond F. Kravis

⑈0000 50000⑈

930409334886

RAYMOND F. KRAVIS
1804 - 1ST NAT'L BLDG.
TULSA, OKLA. 74103

1705

Mar 21 19 88

86-3
1039

PAY TO THE ORDER OF Johnston for Congress $ 500 00/100

5048 5048 00 03-08-88 128168814

Five Hundred and no/100 DOLLARS

BANK OF OKLAHOMA
P.O. Box 2300
Tulsa, Oklahoma 74192

MEMO Contribution

Raymond F. Kravis

"00000 50000"

930400933 4887

Trust

RAYMOND F. KRAVIS
1804 FIRST NATIONAL BUILDING
TULSA, OKLAHOMA 74103 . . .

MEMBER OF SENATORIAL TRUST

BANK OF OKLAHOMA
TULSA

5233

PAY

RAYMOND F. KRAVIS 1000 DOLLARS 00 CTS

BANK OF OKLAHOMA TULSA OKLAHOMA

MAY 02 88

CANCELLED

April 11, 1988
DATE

$1,000.00
AMOUNT

TO THE ORDER OF

People for John Heinz

RAYMOND F. KRAVIS

Raymond F. Kravis

"0000100000"

930400933488

RAYMOND F. KRAVIS
1801 ~~1705~~ 1ST NAT'L BLDG.
TULSA, OKLA. 74103

1364

Jan 6 1986

86-3
1039

PAY TO THE ORDER OF Friends of Dick Lugar $250 00/100

Two Hundred Fifty and 00/100 DOLLARS

BANK OF OKLAHOMA
P.O. Box 2300
Tulsa, Oklahoma 74192

MEMO

Raymond F. Kravis

"00000 25000"

930409333439

RAYMOND F. KRAVIS
1800 - 1ST NAT'L BLDG.
TULSA, OKLA. 74103

1446

Jan 27 1987

88-3
1039

PAY TO THE ORDER OF The Vice President's Expenditure Account $ 250 00/100

Two Hundred Fifty and no/100 DOLLARS

BANK OF OKLAHOMA
P.O. Box 2300
Tulsa, Oklahoma 74192

MEMO

Raymond F. Kravis

"00000 25000"

930409334490

RAYMOND F. KRAVIS
1804 FIRST NATIONAL BUILDING
TULSA, OKLAHOMA 74103 . . .

BANK OF OKLAHOMA
TULSA, N.A.

4637

PAY RAYMOND F. KRAVIS ONE HUNDRED DOLS 00 CTS

June 3, 1987
DATE

$100.00
AMOUNT

TO THE ORDER OF Friends of Dick Lugar

RAYMOND F. KRAVIS

Raymond F. Kravis

⑈000004 10000⑈

DELUXE

930400933349

RAYMOND F. KRAVIS
1804 FIRST NATIONAL BUILDING
TULSA, OKLAHOMA 74103 . . .

BANK OF OKLAHOMA
TULSA, N.A.

4927

PAY RAYMOND F. KRAVIS ONE HUNDRED DOLS 00 CTS

September 14, 1987 DATE

$100.00 AMOUNT

TO THE ORDER OF Friends of Dick Lugar

RAYMOND F. KRAVIS

Raymond F. Kravis

⑈00000 10000⑈

⑆103004093349⑆2

RAYMOND F. KRAVIS
1804 FIRST NATIONAL BUILDING
TULSA, OKLAHOMA 74103 . . .

BANK OF OKLAHOMA
TULSA, N.A.

5067

PAY RAYMOND F. KRAVIS 250 DOLS 00 CTS

October 19, 1987
DATE

$250.00
AMOUNT

TO THE ORDER OF Friends of Dick Lugar

RAYMOND F. KRAVIS

Raymond F. Kravis

⑈00000 25000⑈

⑆093040933349 93⑆

5193

RAYMOND F. KRAVIS
1804 FIRST NATIONAL BUILDING
TULSA, OKLAHOMA 74103 . . .

BANK OF OKLAHOMA
TULSA

PAY 250 DOLS 00 CTS November 13, 1987 $250.00
DATE AMOUNT

TO THE ORDER OF Friends of Jim Inhofe

RAYMOND F. KRAVIS

Raymond F. Kravis

⑈00000 25000⑈

⑆307409334934⑆

RAYMOND F. KRAVIS
1804 FIRST NATIONAL BUILDING
TULSA, OKLAHOMA 74103 . . .

BANK OF OKLAHOMA
TULSA

5198

PAY RAYMOND F. KRAVIS ONE HUNDRED DOLS 00 CTS April 5, 1988 $100.00

TO THE ORDER OF Republican National Committee

Membership Fee

RAYMOND F. KRAVIS

Raymond F. Kravis

⑈00000 10000⑈

⑆930400933349⑆5

RAYMOND F. KRAVIS
1804 FIRST NATIONAL BUILDING
TULSA, OKLAHOMA 74103 . . .

BANK OF OKLAHOMA
TULSA

5305

PAY TO THE ORDER OF

RAYMOND F. KRAVIS 250 DOLS 00 CTS April 25, 1988 $250.00
AMOUNT

Reid Moore for Congress

RAYMOND F. KRAVIS

Raymond F. Kravis

⑈00000 25000⑈

DELUXE CHECK

⑆304093349⑆6

5383

RAYMOND F. KRAVIS
1804 FIRST NATIONAL BUILDING
TULSA, OKLAHOMA 74103 . . .

BANK OF OKLAHOMA
TULSA

PAY RAYMOND F. KRAVIS 250 DOLS 00 CTS June 1, 1988 $250.00
DATE AMOUNT

TO THE ORDER OF Dole for President Committee

RAYMOND F. KRAVIS

Raymond F. Kravis

ØIGBLT

⑈00000 25000⑈

DELUXE CHECK PRINTERS

⑆930400933349

Yes Mr. Vice President, I would like to help Senator Dole retire his campaign debt.
Enclosed is my contribution for:

☐ $1,000 ☐ $500 ☒ $250 ☐ $ Other_____

Make checks payable to:

Dole for President Committee
c/o Vice President George Bush
P.O. Box 756
La Plata, Maryland 20646

Name Raymond F. Kravis

Address 2109 East 30th Place

City Tulsa State OK Zip 74114 Telephone (918) 742-3294

Authorized by Dole for President Committee
Contributions to this Committee are not deductible for Federal income tax purposes.

930409334998

5416

RAYMOND F. KRAVIS
1804 FIRST NATIONAL BUILDING
TULSA, OKLAHOMA 74103 . . .

BANK OF OKLAHOMA
TULSA

PAY RAYMOND F. KRAVIS 350 DOLS 00 CTS

June 8, 1988
DATE

$350.00
AMOUNT

TO THE ORDER OF Synar for Congress Committee

RAYMOND F. KRAVIS

Raymond F. Kravis

⑈00000350000⑈

⑆093040933499⑆

5918

RAYMOND F. KRAVIS
1804 FIRST NATIONAL BUILDING
TULSA, OKLAHOMA 74103 . . .

BANK OF OKLAHOMA
TULSA

PAY RAYMOND F. KRAVIS 400 DOLS 00 CTS — November 15, 1938 (DATE) — $400.00 (AMOUNT)

TO THE ORDER OF National Republican Congressional Committee

RAYMOND F. KRAVIS

Raymond F. Kravis

"00004,0000"

DELUXE CHECK PRINTERS

930400933500

RAYMOND F. KRAVIS
1804 FIRST NATIONAL BUILDING
TULSA, OKLAHOMA 74103 . . .

BANK OF OKLAHOMA
TULSA

5635

PAY RAYMOND F. KRAVIS 200 DOLS 00 CTS August 22, 1988 $200.00
DATE AMOUNT

TO THE ORDER OF Friends of Jim Inhofe Committee

RAYMOND F. KRAVIS

Raymond F. Kravis

"00000 20000"

DELUXE CHECK

930409335501

INHOFE CONGRESSIONAL FORUM

_____ Yes, I will attend the Inhofe Congressional Forum reception and luncheon and am enclosing $_____ for myself and _____ guests at $200 per person.

_____ Yes, I will attend the Inhofe Congressional Forum luncheon only and am enclosing $_____ for myself and _____ guests at $50 per person.

_____ I will be unable to attend but am enclosing my check for $_____.

I have reached my $5,000 limit for this year. I am enclosing a check in the amount of $ 0 for which Mrs. Bessie Kravis is to receive credit.

NAME Bessie R. Kravis

NAME OF GUEST(S) _____

TELEPHONE 742-3294

ORGANIZATION/OCCUPATION Homemaker

ADDRESS 2109 East 30th Place

Tulsa, OK 74114

Federal Law only allows us to accept personal or federal PAC checks. Please make checks payable to Friends of Jim Inhofe Committee.

Paid for by Friends of Jim Inhofe Committee. A copy of our report is filed with the Federal Elections Commission and is available for purchase from the Federal Elections Commission, Washington, D.C. 20463.

Political contributions are not deductible as charitable contributions for Federal income tax purposes.

9040933502

RAYMOND F. KRAVIS
1804 FIRST NATIONAL BUILDING
TULSA, OKLAHOMA 74103 . . .

DMJ

BANK OF OKLAHOMA
TULSA

5673

PAY RAYMOND F. KRAVIS 250 DOLS 00 CTS August 30, 1988 $250.00
DATE AMOUNT

TO THE ORDER OF Alan Keyes for U. S. Senate

RAYMOND F. KRAVIS

Raymond F. Kravis

⑈00000 25000⑈

⑆930400933503

RAYMOND F. KRAVIS
1804 FIRST NATIONAL BUILDING
TULSA, OKLAHOMA 74103

August 30, 1988

Mr. Alan Keyes
8115 Fenton St., Suite 314
Silver Spring, MD 20910-0789

Dear Mr. Keyes:

Enclosed is a check from my wife, Bessie R. Kravis, in the amount of $250 for your campaign. I wish I could send you something, but I have reached my $25,000 limit and Mrs. Kravis is pretty close to it. I do, however, wish you much success in your campaign and after November 8 I hope I can address you as Senator Alan Keyes.

Sincerely,

Raymond F. Kravis

RFK:mh
Enclosure

93040933504

930409335 05

REPUBLICAN NATIONAL FINANCE COMMITTEE
310 FIRST STREET, SE.
WASHINGTON, D.C. 20003

2510

SEPTEMBER 17 19 90 89-408/860-475

PAY TO THE ORDER OF MR. RAYMOND F. KRAVIS $ $4,300.00

FOUR THOUSAND THREE HUNDRED AND 00/100 DOLLARS

Bank of Virginia
1755 South Jefferson Davis Highway
Arlington, Virginia 22202

FOR REFUND 1988 PRES TRUST

⑈00002510⑈ ⑆056004089⑆ 651⑈722064 3⑈

930409335506

REPUBLICAN NATIONAL FINANCE COMMITTEE
310 FIRST STREET, SE.
WASHINGTON, D.C. 20003

2515

9/18 19 90

99-409/650 475

PAY TO THE ORDER OF Mr. Raymond F. Kravis $**2,500.00**

Two thousand five hundred dollars and no cents DOLLARS

Bank of Virginia
1755 South Jefferson Davis Highway
Arlington, Virginia 22202

FOR refund 1988 contribution

⑈0000 2515⑈ ⑆056004089⑆ 651⑈ 722064 3⑈

EXHIBIT "B"

9304093335507

1986 and 1987 Contributions
Less Than $500 Attributable to 1988 $25,000 Limit

Check #	Amount	Date of Check	Candidate/Committee
1364	$250	01/06/86	Friends of Dick Lugar
1446	$250	01/27/87	The Vice President's Exploratory Account
4637	$100	06/03/87	Friends of Dick Lugar
4927	$100	09/14/87	Friends of Dick Lugar
5067	$250	10/19/87	Friends of Dick Lugar
5193	$250	11/13/87	Friends of Jim Inhofe
TOTAL:	$1,200		

1988 Contributions Less Than $500

Check #	Amount	Date of Check	Candidate/Committee
5198	$100	04/05/88	RNC
5305	$250	04/25/88	Reid Moore for Congress
5383	$250	06/01/88	Dole for President
5416	$350	06/08/88	Synar for Congress
5918	$400	11/15/88	NRCC
TOTAL:	$1,350		

9304093508

EXHIBIT "C"

9304093350 9

Checks Less Than $500 Attributed
to Bessie Kravis But Signed By Raymond Kravis
on Raymond Kravis' Account

Check #	Amount	Date of Check	Candidate/Committee
5635	$200	08/22/88	Friends of Jim Inhofe
5673	$250	08/30/88	Keyes for Senate
TOTAL:	$450		

93040933510

RAYMOND F. KRAVIS
1804 FIRST NATIONAL BUILDING
TULSA, OKLAHOMA 74103 . . .

BANK OF OKLAHOMA
TULSA

5635

PAY RAYMOND F. KRAVIS 200 DOLS 00 CTS August 22, 1988 $200.00
DATE AMOUNT

TO THE ORDER OF Friends of Jim Inhofe Committee

RAYMOND F. KRAVIS

Raymond F. Kravis

"00000 20000"

DELUXE CHECK PRINTERS

930409335111

INHOFE CONGRESSIONAL FORUM

_____ Yes, I will attend the Inhofe Congressional Forum reception and luncheon and am enclosing $_____ for myself and _____ guests at $200 per person.

_____ Yes, I will attend the Inhofe Congressional Forum luncheon only and am enclosing $_____ for myself and _____ guests at $50 per person.

_____ I will be unable to attend but am enclosing my check for $_____.

I have reached my $25,000 limit for this year. I am enclosing a check in the amount of $100 for Mrs. Bessie Kravis for her personal use.

NAME Bessie R. Kravis

NAME OF GUEST(S) _____

TELEPHONE 742-3294

ORGANIZATION/OCCUPATION Homemaker

ADDRESS 2109 East 30th Place

Tulsa, OK 74114

Federal Law only allows us to accept personal or federal PAC checks. Please make checks payable to Friends of Jim Inhofe Committee.

Paid for by Friends of Jim Inhofe Committee. A copy of our report is filed with the Federal Elections Commission and is available for purchase from the Federal Elections Commission, Washington, D.C. 20463.

Political contributions are not deductible as charitable contributions for Federal income tax purposes.

RAYMOND F. KRAVIS
1804 FIRST NATIONAL BUILDING
TULSA, OKLAHOMA 74103 . . .

dmj

BANK OF OKLAHOMA
TULSA

5673

PAY RAYMOND F. KRAVIS 250 DOLS 00 CTS August 30, 1988 $250.00
DATE AMOUNT

TO THE ORDER OF Alan Keyes for U. S. Senate

RAYMOND F. KRAVIS

Raymond F. Kravis

⑈00000250⑆00⑈

⑆930409335⑆13

RAYMOND F. KRAVIS
1804 FIRST NATIONAL BUILDING
TULSA, OKLAHOMA 74103

August 30, 1988

Mr. Alan Keyes
8115 Fenton St., Suite 314
Silver Spring, MD 20910-0789

Dear Mr. Keyes:

Enclosed is a check from my wife, Bessie R. Kravis, in the amount of $250 for your campaign. I wish I could send you something, but I have reached my $25,000 limit and Mrs. Kravis is pretty close to it. I do, however, wish you much success in your campaign and after November 8 I hope I can address you as Senator Alan Keyes.

Sincerely,

Raymond F. Kravis

RFK:mh
Enclosure

93040933514

EXHIBIT "D"

9304093351 5

DOLE
PRESIDENT

[redacted]

P.O. Box 859
McLean, VA 22101

September 20, 1990

Mr. Paul E. Sullivan
Wunder & Diefenderfer
1615 L Street, NW Suite 650
Washington, DC 20036

Dear Paul,

Pursuant to your request for information regarding contributions by Mr. Raymond Kravis to the Dole for President Committee, the following explanation is provided.

Dole for President Committee received a $1,000.00 contribution from Mr. Raymond Kravis in May 1987. An additional $250.00 contribution was received on June 8, 1988. Both contributions were reported on the Committee's Federal Election Commission reports. Since the second contribution of $250.00 resulted in an excess contribution, the Committee requested and received a letter of reattribution signed by Mr. Raymond Kravis and Mrs. Bessie Kravis reattributing the contribution to Mrs. Bessie Kravis. This reattribution was reported on August 15, 1988 on the Committee's Federal Election Commission report, (see attached).

If you need further assistance, please call me at 202/675-4291.

Respectfully,

James L. Hagen

James L. Hagen, Treasurer
Dole for President Committee

enclosure

Paid for by Dole for President Committee

23040933516

DOLE FOR PRESIDENT, INC.

MEMO ENTRY - LINE 17A - REATTRIBUTION OF CONTRIBUTIONS

ORIGINALLY:	REATTRIBUTION DATE	CONTRIBUTION AMOUNT	YEAR-TO-DATE AGGREGATE
Hon. M. Sotirhos U.S. Embassy-Kingston Washington, DC 20520 $500.00 7/14/88			
M. Sotirhos	8/28/88	250.00	250.00
Estelle Sotirhos	8/28/88	250.00	250.00
Mr. M. A. Self 444 East 4th Street Hinsdale, IL 60521 $500.00 7/27/88			
M.A. Self	8/31/88	250.00	250.00
Lila M. Self	8/31/88	250.00	250.00
Mr. Raymond Kravis 2109 East 30th Place Tulsa, OK 74114 $250.00 6/08/88			
Bessie Kravis	8/15/88	250.00	250.00
Nancy Boudakian 4531 Noeline Way Encino, CA 91436 $500.00 7/18/88			
Nancy BOUDAKIAN	8/30/88	250.00	250.00
Thomas Boudakian	8/30/88	250.00	250.00

EXHIBIT "E"

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Raymond Kravis Refunds

Check #	Amount	Date of Check	Candidate/Committee
2510	$4,300	09/17/90	RNC Presidential Trust
2515	$2,500	09/18/90	RNC Presidential Trust
TOTAL REFUNDS:	$6,800		

TOTAL CONTRIBUTIONS:	$31,000
LESS REFUNDS:	6,800
ADJUSTED 1988 CONTRIBUTIONS:	$24,200

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REPUBLICAN NATIONAL FINANCE COMMITTEE
310 FIRST STREET, SE.
WASHINGTON, D.C. 20003

2510

SEPTEMBER 17 19 90

88-408/560 475

PAY TO THE ORDER OF MR. RAYMOND F. KRAVIS $ $4,300.00

FOUR THOUSAND THREE HUNDRED AND 00/100 DOLLARS

Bank of Virginia
1758 South Jefferson Davis Highway
Arlington, Virginia 22202

FOR REFUND 1988 PRES TRUST

Pat Hyde

⑈00002510⑈ ⑆056004089⑆ 651⑈722064 3⑈

930409335 20

REPUBLICAN NATIONAL FINANCE COMMITTEE
310 FIRST STREET, SE.
WASHINGTON, D.C. 20003

2515

PAY TO THE ORDER OF Mr. Raymond F. Kravis

9/18 19 90

88-408/560 478

Two thousand five hundred dollars and no cents $**2,500.00**

DOLLARS

Bank of Virginia
1738 South Jefferson Davis Highway
Arlington, Virginia 22202

FOR refund 1988 contribution

"0000 2515" :056004089: 651-722643"

9 3 0 4 0 9 3 3 5 2 1

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

KIRKLAND & ELLIS

90 SEP 24 PM 5:49

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

06C7968

200 East Randolph Drive
Chicago, Illinois 60601

To Call Writer Direct:
312 861-2193

312 861-2000

Facsimile:
312 861-2200

September 24, 1990

Ms. Frances B. Hagan
Office of General Counsel
Federal Election Commission
999 E Street, N.W., 6th Floor
Washington, D.C. 20463

Re: **Response In Matter**

Dear Ms. Hagan:

Enclosed please find Mr. Simmons' Response in Matter Under Review No. 3104. If you have any questions, please feel free to call me.

Sincerely,

Gregg A. Garmisa

GAG:evh
Enclosure

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RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 SEP 24 PM 5:49

UNITED STATES OF AMERICA
BEFORE
THE FEDERAL ELECTION COMMISSION

In Re Matter Under Review No. 3104	
Harold C. Simmons, Respondent	RESPONSE OF HAROLD C. SIMMONS

INTRODUCTION

Respondent Harold C. Simmons ("Mr. Simmons"), through his attorneys, Kirkland & Ellis, submits this memorandum in support of his written request for conciliation negotiations dated September 7, 1990.

There are basically two factors to consider in this Matter Under Review ("MUR"). First, Mr. Simmons may have unintentionally or inadvertently breached certain provisions of the Federal Election Campaign Act (the "Act"). Second, and much more significant, Mr. Simmons fully intended to adhere to the Act at all times, and as soon as he learned of a potential compliance problem, he immediately adopted measures intended to correct any noncompliance. Mr. Simmons, therefore, respectfully submits that this controversy can, and should be, resolved speedily through the conciliation process.

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A. MR. SIMMONS TOOK ALL APPROPRIATE CORRECTIVE STEPS UPON LEARNING OF POTENTIAL MISINTERPRETATIONS OF HIS FEDERAL POLITICAL CONTRIBUTIONS.

1. Mr. Simmons learned of a potential problem through the media, but before that believed in the propriety of his conduct.

Mr. Simmons became aware of a possible compliance problem with the Act through a news story that appeared in the April 18, 1990 edition of the Los Angeles Times. See Affidavit of Harold C. Simmons ("Affidavit") attached hereto as Exhibit A. Prior thereto, Mr. Simmons believed that he was in full compliance with the Act. See Affidavit.

2. Mr. Simmons immediately moved to cure any defect.

Immediately thereafter, and prior to any notice from the Federal Election Commission ("Commission"), Mr. Simmons sought to correct any unintended exceeding of the spending limitations. See Affidavit. Mr. Simmons sent two letters (attached hereto as Exhibit B) to contributees from the 1988 cycle to ensure compliance with the Act. In those letters, Mr. Simmons explained the circumstances which generated this MUR as follows:

> First, I was unaware that certain contributions made in 1987 and 1989 to candidates standing for election in 1988 would be counted toward my 1988 limitation under FEC regulations. Second, I believed that certain contributions were to be recorded as joint contributions on behalf of my wife and me, but apparently not all records properly reflect this. The inclusion of 1987 and 1989 contributions in 1988 and the attribution of the entire amount of joint contributions to me alone had the effect of increasing my total contribution level beyond that which I had intended.

Exhibit B. One letter concludes with a request that the contribution be refunded and the other asks that the contribution be

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redesignated as a joint contribution from Mr. and Mrs. Simmons. (A complete list of recipients of those letters is attached hereto as Exhibit C.)

3. Mr. Simmons' efforts ensure his compliance with the Act.

a. The refund request letter.

As a result of the refund request letter, Mr. Simmons has obtained refunds, or has been assured of refunds, totalling $30,000,[1] as detailed below:

Recipient	Date	Amount	Status
NRSC	1/20/88	$2,000	Received
Cons. Victory Comm.	6/30/88	$5,000	Received
Sen. Connie Mack Comm.	6/14/89	$1,000	Received
Cong. Joe Barton Comm.	4/22/87	$1,000	Received
Cong. Joe Barton Comm.	7/13/88	$1,000	Received
Contran PAC	11/14/89	$5,000	Received
Kirkland & Ellis PAC	3/28/88	$5,000	Received
Conservatives Acting For Texans Comm.	2/18/88	$10,000	Will send check as soon as money available.
	Total	$30,000	

The effects of the refunds are threefold. First, the refund of the contributions from the Conservatives Acting for Texans Committee will remove doubts about compliance with § 441a-(a)(1)(c), which prohibits contributions in excess of $5,000 to certain committees. Second, the 1988 refunds (totalling $25,000) reduce significantly the amount attributable to Mr. Simmons for purposes of his individual spending limit for that year, although, standing alone, not sufficiently to comply with the $25,000

[1] All currently available cancelled checks and other documents recording the refunds are attached hereto as Exhibit D.

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individual limitation. Third, the refund of the 1989 $5,000 contribution from the Contran political action committee reduces Mr. Simmons' 1989 total contributions to a statutorily acceptable level. Mr. Simmons' efforts to obtain these refunds represent good faith gestures to adhere to the letter and spirit of the Act.

b. The reattribution request letter.

Additionally, Mr. Simmons' letter requesting reattribution of the contributing source would reconfigure his campaign contributions significantly. As the following table discloses, Mr. Simmons' contributions would be reduced by approximately $12,000:

Recipient	Date of Contribution	Harold C. Simmons	Annette Simmons
Friends of Denny Smith	5/31/88	$500	$500
Friends of Dick Armey	5/22/87	$500	$500
Friends of Dick Armey	5/22/87	$500	$500
Hatch Election Committee	4/21/87	$500	$500
John Bryant Campaign Committee	9/30/86	$500	$500
Dingell for Congress Committee	1/29/88	$500	$500
Williams Congress '88	6/30/88	$250	$250
Gore for President Committee	2/16/88	$500	$500
Danforth for Senate Committee	2/11/88	$250	$250
Friends for Slade Gorton 1988	7/18/88	$500	$500
Friends of Dick Lugar	1/20/88	$500	$500
Friends of Dick Lugar	1/20/88	$500	$500
Friends of Voinovich	2/22/88	$500	$500
Haig for President	5/10/88	$500	$500
Kent Hance for Senate Committee	12/30/87	$500	$500
Ashley for Congress Committee	5/03/88	$300	$300
McEwen '88	6/09/87	$250	$250
Michel for Congress Committee	4/29/88	$500	$500

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WYNSF FOR CONGRESS COMMITTEE	6/28/88	$250	$250
Ortiz for Congress	5/26/87	$250	$250
Pete Dawkins for Senate	2/08/88	$500	$500
Pete Dawkins for Senate	12/25/88	$250	$250
Pete DuPont for President	4/01/87	$500	$500
Texans for Beau Boulter	10/10/87	$500	$500
Texans for Beau Boulter	3/28/88	$500	$500
Steve Bartlett Congressional Campaign Committee	10/26/87	$437.50	$437.50
Steve Bartlett Congressional Campaign Committee	1/29/88	$300	$300
	TOTAL	$11,937.50	$11,937.50

c. **Without a doubt, Mr. Simmons has adopted measures to assure full compliance with the Act.**

The following tables incorporate Mr. Simmons' corrective measures, as described above, to provide an accurate overview of his contributions:

1988 Cycle Total Contributions:

Technical Total:	$58,426.00[2]
Less $25,000 in Refunds:	-25,000.00
Subtotal:	$33,426.00
Less $11,937.50 in reattributions	-11,937.50[3]
Actual Total:	$21,488.50

[2] The technical total in the Commission's "D" index attached to its letter dated August 17, 1990 is $64,626.00. Mr. Simmons, however, believes that there are errors in the Commission's records, which are discussed in greater detail in Section B, infra.

[3] After Mr. Simmons mailed the reattribution request letters, he learned from recipients' responses that due to reporting requirements imposed on candidates by 11 C.F.R. § 110(k)(3)(ii)(B) it would be impossible to comply with his request.

1989 Total Contributions:

Technical Total:	$26,250.00
Less $5,000 in Refunds:	-5,000.00
Actual Total:	$21,250.00

§ 441a(a)(1)(c) Total In 1988

Technical Total:	$10,000.00
Less $10,000 Refund:	-10,000.00
Actual Total:	$ 0.00

In sum, Mr. Simmons always intended to comply with the Act. Upon learning of potential violations, he immediately sought to remove any cloud of improper activity. Mr. Simmons' efforts are proving successful and, but for the impossibility of reattribution due to 11 C.F.R. § 110(k)(3)(ii)(B), he would be in compliance at this point. He has done everything he possibly can at this time to comply with the Act.

B. The Commission's Calculations Overstate Mr. Simmons' Contributions In The 1988 Election Cycle.

Mr. Simmons has examined the Commission's "D" index and has concluded that the Commission's total for the 1988 cycle ($64,626.00) misstates the extent of his political giving. First, the "D" index does not record a $1,000 refund received from the Pete Dupont for President campaign on November 25, 1987 (although it records the contribution), which is attached hereto as Exhibit E. Second, the $5,000 contribution to the WTW Reelection Committee properly reflects that it is a joint contribution from Mr. and Mrs. Simmons, and thus should be attributed equally to both. (That contribution currently is attributed solely to Mr. Simmons.) See

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Exhibit F attached hereto. Third, the $2,000 contribution to Friends of Dick Lugar dated January 20, 1988 also explicitly reflects that it is from Mr. and Mrs. Simmons for the primary and general elections. In other words, there were four $500 contributions (two from each contributor), not two $1,000 checks from Mr. Simmons. See Exhibit G attached hereto. Fourth, the $1,000 contribution to Californians for Pete Wilson and dated June 30, 1988 should be charged against the 1994 ceiling. A copy of the Commission's Selected List of Receipts & Expenditures for 1987-88, attached hereto as Exhibit H, shows that the contribution was for "Californians For Pete Wilson 1994." Finally, the May 19, 1989 contribution to Friends of Denny Smith, attached hereto as Exhibit I, should be counted toward the 1990 limitation. According to 11 C.F.R. § 110.1(b)(2)(ii), contributions which are not designated for a specific election are deemed to relate to the next future election, which in this instance is 1990.

In the interests of full disclosure and cooperation, Mr. Simmons has uncovered other contributions attributable to 1988. First, two $100 contributions to the Republican National Committee were made on December 8 and May 25, 1988. Second, a check totalling $100 payable to the Steve Bartlett Congressional Campaign Committee was written on March 27, 1987. Copies of all of these cancelled checks are attached hereto as Exhibit J.[4]

[4] Copies of all available cancelled checks which are relevant to this Matter Under Review are attached hereto as Exhibit K.

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Thus, the Commission's technical totals for the 1988 elections should be as set forth below:

Commission Technical Total:	$64,626.00
Plus RNC and Bartlett:	+ 300.00
Less DuPont refund:	- 1,000.00
Less $2,500 from WTW:	- 2,500.00
Less $1,000 from correction of Lugar entry:	- 1,000.00
Less $1,000 from correction of Wilson entry:	- 1,000.00
Less $1,000 from correction of Smith entry:	- 1,000.00
Actual Total:	$58,426.00

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SUMMARY AND CONCLUSION

This MUR alleges that Mr. Simmons committed three violations of the Act. First, the Commission contends that Mr. Simmons violated his individual contribution limitation for 1988. As discussed above, however, any unintentional overspending is being reduced through a vigorous effort to obtain refunds and Mr. Simmons' attempts to reattribute certain contributions. The success of his reattribution accomplishments is only frustrated by a technical provision of the Act's regulations. Second, the Commission states that Mr. Simmons made excessive contributions to a committee in 1988. As demonstrated above, however, the Conservatives Acting for Texans Committee has provided assurance that it will refund both 1988 contributions as soon as funds become available. Third, the Commission contends that Mr. Simmons exceeded the 1989 ceiling for individuals. Again, however, Mr.

Simmons has acted to correct any violation. In this case, the refund from the Contran political action committee removes any possible concerns about Mr. Simmons' desire to adhere to the Act.

Mr. Simmons may have inadvertently and technically exceeded applicable limitations. His intentions, however, were always to comply with the requirements of the Act. That intent is readily witnessed by Mr. Simmons' rapid efforts to correct any misunderstanding. Mr. Simmons' letters, and follow-up actions, are resulting in his adherence to the letter and spirit of the Act. In his continuing spirit of cooperation, Mr. Simmons respectfully requests that the conciliation phase of this MUR be commenced forthwith.

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Respectfully submitted,

HAROLD C. SIMMONS

Dated:

By: _____
William S. Singer
One of His Attorneys

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UNITED STATES OF AMERICA
BEFORE
THE FEDERAL ELECTION COMMISSION

In Re Matter Under Review No. 3104 Harold C. Simmons, Respondent	AFFIDAVIT OF HAROLD C. SIMMONS

I, Harold C. Simmons, being first duly sworn, hereby depose and state as follows:

1. Unless otherwise noted, the facts set forth herein are within my personal knowledge and, if called as a witness or in some other manner to testify under oath, I can competently testify with respect thereto.

2. Until a story regarding campaign contributions appeared in the Los Angeles Times on April 18, 1990 I believed that my political contributions fully complied with the requirements of the Federal Election Campaign Act.

3. As soon as I learned of the potential compliance problem under the Act, letters were sent to contributees for the 1988 election cycle requesting either refunds or reattribution of the contributing source (i.e. Harold and Annette Simmons).

4. Since those letters were mailed, I have recaptured, or have commitments of refunds of, $20,000.

5. To the extent that my total contributions attributable to 1988 exceeded applicable limitations, such overages were

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entirely unintentional. Any excess was neither willful nor intentional.

FURTHER AFFIANT SAYETH NOT.

Harold C. Simmons

Sworn to and subscribed before me this 21st day of September, 1990

Notary Public in and for Dallas County, Texas

My commission expires: 2-11-92

LaVELLE PHILLIPS
Notary Public, State of Texas
My Comm. Expires 2-11-92

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ATTACHMENT A

(Letter requesting refunds of contributions)

[HCS Letterhead]

[Name and Address of PAC/Candidate]

Dear _____:

It has recently come to my attention that Federal Election Commission records reflect federal campaign contributions on my behalf for 1988 in excess of the applicable $25,000 annual limitation. This situation is the result of two factors, neither of which I was aware of at the time the contributions were made.

First, I was unaware that certain contributions actually made in 1987 and 1989 to candidates standing for election in 1988 would be counted toward my 1988 limitation under FEC regulations. Second, I believed that certain contributions were to be recorded as joint contributions on behalf of my wife and me, but apparently not all records properly reflect this. The inclusion of 1987 and 1989 contributions in 1988 and the attribution of the entire amount of joint contributions to me alone had the effect of increasing my total contribution level beyond that which I had intended.

As it has always been my intention to comply fully with applicable contribution limitations, I wish to correct this situation. Accordingly, I am writing to request that my contribution of [$_____] on [date] be refunded to me. I apologize for any inconvenience caused by my request, and I appreciate your attention to this matter.

Sincerely,

Harold Simmons

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ATTACHMENT B

(Letter requesting redesigation of contributions)

[HCS Letterhead]

[Name and Address of PAC/Candidate]

Dear _____:

It has recently come to my attention that Federal Election Commission records reflect federal campaign contributions on my behalf for 1988 in excess of the applicable $25,000 annual limitation. This situation is the result of two factors, neither of which I was aware of at the time the contributions were made.

First, I was unaware that certain contributions actually made in 1987 and 1989 to candidates standing for election in 1988 would be counted toward my 1988 limitation under FEC regulations. Second, I believed that certain contributions were to be recorded as joint contributions on behalf of my wife and me, but apparently not all records properly reflect this. The inclusion of 1987 and 1989 contributions in 1988 and the attribution of the entire amount of joint contributions to me alone had the effect of increasing my total contribution level beyond that which I had intended.

As it has always been my intention to comply fully with applicable contribution limitations, I wish to correct this situation. Accordingly, I am writing to request that your records be updated to properly reflect the contribution of [$_____] on [date] as a joint contribution by my wife (Annette Simmons) and me. I apologize for any inconvenience caused by my request, and I appreciate your attention to this matter.

Sincerely,

Harold Simmons

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RECIPIENTS OF SIMMONS LETTERS

REFUND:

1. Conservative Victory Commission
2. Conservatives Acting for Texans
3. Kirkland & Ellis PAC
4. National Republican Senatorial Committee
5. Congressman Joe Barton Committee
6. Jeffords-Mack Victory Committee (refund requested from Mack only)
7. Friends of Connie Mack

REDESIGNATION:

1. Friends of Denny Smith
2. Friends of Dick Armey
3. Hatch Election Committee
4. John Bryant Campaign Committee
5. Dingell for Congress Committee
6. Williams Congress '88
7. Gore for President Committee
8. Danforth For Senate Committee
9. Friends for Slade Gorton 1988
10. Friends of Dick Lugar
11. Friends of Voinovich
12. Haig for President
13. Kent Hance for Senate Committee
14. Markey for Congress Committee
15. McEwen '88
16. Michel for Congress Committee

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17. Synar for Congress Committee

18. Ortiz for Congress

19. Pete Dawkins for Senate

20. Pete DuPont for President

21. Texans for Beau Boulter

22. Steve Bartlett Congressional Campaign Committee

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9 3 0 4 0 9 3 3 5 4 2

CAT/PAC

Conservatives Acting Together / Political Action Committee

Richard H. Collins
Chairman

August 20, 1990

Mr. Harold Simmons
5430 LBJ Freeway
Dallas, Texas 75240-2697

Dear Harold:

It has been brought to our attention that you gave a contribution of $5000 on February 18, 1988 and another $5000 on August 12, 1988 and due to an oversight on our part, we should not have accepted the second contribution. In order to avoid any appearance of impropriety, we will refund the full $10,000 and will do so as money comes available in the PAC's fund.

Again, I apologize for the oversight on our part.

Sincerely,

Fran Sauls

Fran Sauls
Treasurer

930409335543

2929 Carlisle, Suite 222 Dallas, Texas 75204 (214) 871-9300

1409

KIRKLAND & ELLIS PAC 11-86
c/o William S. Singer
200 East Randolph Dr., Ste. 5900
Chicago, Illinois 60601

2-75
710

May 18, 1990

PAY TO THE ORDER OF Harold Simmons $ 5,000.00

Five Thousand and 00/100---------- DOLLARS

CHICAGO BANK OF COMMERCE
Chicago, Illinois 60601

FOR Refund

⑈001409⑈ ⑆071000754⑆ ⑈00 7871 4⑈ ⑈0000500000⑈

9304092335|44

MY 90 29

⑆71000013⑆

MY 90 25
BANK ONE, TEXAS, NA
1910 POMARENCE ST.
DALLAS, TX 75201

⑆1110 006144

⑆111000144

BANK ONE, TEXAS, NA
DALLAS, TX 75201

⑆111000144

MAY 25 90

1019 $0839

For Payment only
Harold Simmons
Acct. #29-7328-5

CONSERVATIVE VICTORY COMMITTEE
PH. 703-684-6603
111 S. COLUMBUS STREET
ALEXANDRIA, VA. 22314

1ST AMERICAN BANK
FIRST AMERICAN BANK OF VIRGINIA
MCLEAN, VIRGINIA 22102

1447

Sept 18 1990

56-474/500 025

PAY five thousand and no/100---------- DOLLARS $ 5000.00

TO THE ORDER OF Harold Simmons

Jeanette R Bosley
Lyndon LaRouche

⑈0000 1447⑈ ⑆056004241⑆ 0057384 1⑈

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.

CONSERVATIVE VICTORY COMMITTEE

DELUXE - FORM BVCP-3 V-2

DATE	DESCRIPTION	AMOUNT
9/18/90	Contribution refund from 1988 4010F	$5000.00

9304093354 5

THE CONGRESSMAN JOE BARTON
COMMITTEE CAMPAIGN 1990
P. O. BOX 1444 214-875-6668
ENNIS, TX 75120

696

May 29 19 90

PAY TO THE ORDER OF Harold Simmons $ 2,000.00

Two thousand and 00/100 DOLLARS

Refund - In excess of $25,000 limit			
	April 22 1987	1000	00
	July 13 1988	1000	00

Judy Markley

NCNB

⑈000696⑈ ⑆113190768⑆ ⑈0120?

2 0 4 0 0 2 3 3 5 5 4 6

NATIONAL REPUBLICAN SENATORIAL COMMITTEE
425 SECOND STREET, NE.
WASHINGTON, DC 20002

01-SIMMONSH

SIGNET BANK
VIENNA, VA
56-408/560

41753

DATE	CONTROL NO.	AMOUNT
06/05/90	041753	*****$2,000.00

PAY TO THE ORDER OF

*******2,000 DOLLARS AND 00 CENTS

HAROLD SIMMONS
SUITE 1700
5430 LBJ FREEWAY
DALLAS TX 75240

James L. Hagen

⑈00041753⑈ ⑆056004089⑆ 651-7172927⑈

930409335547

FRIENDS OF CONNIE MACK
PRIMARY ACCOUNT
1211 N. WESTSHORE BLVD., SUITE 300
TAMPA, FLORIDA 33607

2375

June 1, 1990

PAY TO THE ORDER OF Harold Simmons $ 1,000.00

ONE THOUSAND AND 00/100----------DOLLARS

FIRST FLORIDA

First Florida Bank, N.A.
Hyde Park Office
601 W. Platt St.
Tampa, Florida 33606

⑈002375⑈ ⑆063100264⑆ 4008703938

093354

930

CONTRAN CORPORATION POLITICAL
ACTION COMMITTEE
5430 LBJ FRWY., STE. 1700
DALLAS, TX 75240

130

9-21 1990

PAY TO THE ORDER OF Howard L. Simmons $ 5,000.00

Five Thousand & No/100 DOLLARS

Refund 1988 Contribution

CONTRAN CORPORATION POLITICAL
ACTION COMMITTEE

E.L. Cardenas

NBank

⑈000130⑈ ⑆111000614⑆ 010000774⑈

3354 49

930400

9 3 0 4 0 9 3 3 5 5 0

DEPOSIT TICK

DATE Nov. 25 19 91

Checks and other items are received for deposit subject to the provisions of the Uniform Commercial Code or any applicable collection agreement

IB-002
1110

M Bank Lincoln Centre

HAROLD SIMMONS

CURRENCY		
COIN		
CHECKS	1,000.	00
	31.	85
	81.	90
	82.	20
	46.	00
TOTAL FROM OTHER SIDE	138.	38
TOTAL	1,395.	67

IF OTHER SIDE FOR ADDITIONAL LISTING

930409335551

9 3 0 4 0 9 3 3 5 5 2

8400 LBJ FWY., SUITE 1700
DALLAS, TEXAS 75240

April 20 1987

PAY TO THE ORDER OF WTW Reelection Committee $ 5,000.00

Five thousand dollars & no/100---------- DOLLARS

MBank Lincoln Centre
8400 LBJ Freeway, Suite 100
Dallas, Texas 75240

FOR Harold & Annette Simmons

Harold Simmons

⑈0000500000⑈

⑆930409335553

9 3 0 4 0 9 3 3 5 5 4

9

HAROLD SIMMONS

DALLAS, TEXAS 75240

0041

January 1988

PAY TO THE ORDER OF Lugar for Senate Committee $ 2,000.00

Two thousand dollars & no/100---------- DOLLARS

MBank Lincoln Centre

8400 LBJ Freeway
Dallas, Texas 75240

$1,000 Primary, $1,000 General

FOR Harold & Annette Simmons

Contribution

Harold Simmons

#0000200000#

930409335555

9 3 0 4 0 9 3 3 5 5 6

930409335557

SELECTED LIST OF RECEIPTS & EXPENDITURES (G) (87-88)
SECTION I - INDIVIDUAL CONTRIBUTIONS

CONTRIBUTOR/LENDER/TRANSFERER REPORTING ENTITY MICROFILM LOCATION TRANSACTION TYPE	STREET ADDRESS	CITY	STATE ZIP REPORT TYPE	TYPE OF FILER DATE	ELECTION	AMOUNT
SIMMONS, HAROLD C CONTRAN CORPORATION POLITICAL ACTION COMMITTEE (COMPAC) 87FEC/473/4274 #067355 CONTRIBUTION		DALLAS CONTRAN CORPORATION	TX 75225 MID-YEAR REPORT	15APR87	PRIMARY	5,000
SIMMONS, HAROLD MR ALBERT GORE JR FOR PRESIDENT COMMITTEE INC 88FEC/511/5051 #262394 CONTRIBUTION		DALLAS BUS EXECUTIVE	TX 75240 MARCH MONTHLY	16FEB88	PRIMARY	1,000
SIMMONS, HAROLD MR CALIFORNIANS FOR PETE WILSON 1994 88SEN/011/1205 #417525 CONTRIBUTION		DALLAS BUS EXECUTIVE	TX 75240 JULY QUARTERLY	30JUN88	GENERAL	1,000
SIMMONS, HAROLD MR CAMPAIGN AMERICA 87FEC/460/5396 #008895 CONTRIBUTION		DALLAS CONTRAN CORP	TX 75234 FEBRUARY MONTHLY	29JAN87	PRIMARY	2,000
SIMMONS, HAROLD MR CONGRESSMAN JOE BARTON COMMITTEE 87HSE/356/3748 #155479 CONTRIBUTION		DALLAS CONTRAN CORP	TX 75234 MID-YEAR REPORT	22APR87	PRIMARY	1,000
SIMMONS, HAROLD MR CONGRESSMAN JOE BARTON COMMITTEE 88HSE/362/0784 #614249 CONTRIBUTION		DALLAS CONTRAN GROUP	TX 75240 OCTOBER QUARTERLY	15JUL88	GENERAL	1,000
SIMMONS, HAROLD MR DANFORTH FOR SENATE COMMITTEE 88SEN/008/1307 #359517 CONTRIBUTION		DALLAS CONTRAN CORPORATION	TX 75240 APRIL QUARTERLY	11FEB88	PRIMARY	500
SIMMONS, HAROLD MR FREE CONGRESS PAC (FORMERLY: CMTE FOR THE SURVIVAL OF A FREE CONGRESS) 87FEC/465/4268 #016445 CONTRIBUTION		DALLAS CONTRAN CORP	TX 75244 APRIL MONTHLY	29MAR87	PRIMARY	1,000
SIMMONS, HAROLD MR FRIENDS FOR SLADE GORTON 1988 88SEN/016/0102 #485258 CONTRIBUTION		DALLAS CONTRAN CORPORATION	TX 75240 PRE-PRIMARY	18JUL88	PRIMARY	1,000
SIMMONS, HAROLD MR FRIENDS OF DICK LUGAR 88SEN/006/2242 #301416 CONTRIBUTION X		DALLAS CONTRAN CORPORATION	TX 75240 APRIL QUARTERLY	20JAN88	PRIMARY	1,000
SIMMONS, HAROLD MR FRIENDS OF DICK LUGAR 88SEN/006/2242 #301417 CONTRIBUTION X		DALLAS CONTRAN CORPORATION	TX 75240 APRIL QUARTERLY	20JAN88	GENERAL	1,000
SIMMONS, HAROLD MR FRIENDS OF PHIL GRAMM 88SEN/014/2008 #443704 CONTRIBUTION		DALLAS INVESTMENTS	TX 75234 MID-YEAR REPORT	23JUN88	GENERAL	1,000

03.19.90 01:48 PM
P08

9 3 0 4 0 9 3 3 5 5 8

A4

TEXAS 75240

PAY TO THE ORDER OF Friends of Denny Smith

May 5 19 89

$ 1,000.00

One thousand dollars & no/100---------- DOLLAR

MBank

FOR _____

Harold Simmons

"0000100000

930400933559

9 3 0 4 0 9 3 3 5 6 0

4.

1671

HAROLD SIMMONS

5430 LBJ FRWY., STE. 1700
DALLAS, TEXAS 75240

DEC. 9 - 1992

PAY TO THE ORDER OF Republican National Committee $ 100.00

One hundred dollars & no/100---------- DOLLARS

MBank
Lincoln Centre Office 5430 LBJ Frwy
Dallas, Texas 75240 980-2400

FOR _____

Harold Simmons

⑈00000 10000⑈

⑆930400933556⑆

8435 [illegible] FRWY., STE. 1700
D[illegible]

May 25 19 88

PAY TO THE ORDER OF The Republican National Committee $ 100.00

One hundred dollars & no/100---------- DOLLARS

MBank Lincoln Centre
8400 LBJ Freeway
Dallas, Texas 75240

FOR 1988 Membership

Donald Summons

#00000 10000#

930400933562

5430 LBJ FWY., SUITE 17[illegible]
DALLAS, TEXAS 7524

BRIGHT BANC

March 27 19 87

PAY TO THE ORDER OF Ste[illegible]essional Campaign Committee $ 100.00

One hundred dollars & no/100 DOLLARS

RECEIVED
MAR 30 1987

MBank Lincoln Centre
5430 LBJ Freeway, Suite 100
Dallas, Texas 75240
Steve Bartlett
Congressional Campaign Committee

FOR

Harold L. Simmons

⑈00000 10000⑈

93'040933563

9 3 0 4 0 9 3 3 5 6 4

DEPOSIT TICKET

DATE Nov. 25 19 87

Checks and other items are received for deposit subject to the provisions of the Uniform Commercial Code or any applicable collection agreement

JR-883
1110

MBank Lincoln Centre
[illegible]

HAROLD SIMMONS

CURRENCY		
COIN		
CHECKS	[illegible]	1,000. 00
LIST CHECKS SINGLY	[illegible]	31. 83
	[illegible]	81. 90
	[illegible]	8 20
	[illegible]	46. 69
TOTAL FROM OTHER SIDE		138. 35
TOTAL		1,355. 67

USE LIST FOR ADDITIONAL LISTING

930409335565

8430 LBJ FWY., SUITE 17
DALLAS, TEXAS 7524

March 2 87

PAY TO THE ORDER OF Senator Lloyd Bentsen Election Committee $ 2,000.00

Two thousand dollars & no/100---------- DOLLARS

MBank Lincoln Centre
8430 LBJ Freeway, Suite 100
Dallas, Texas 75243

FOR Contribution from Harold & Annette Simmons

Harold Simmons

0000200000

930400933566

8430 LBJ FWY., SUITE 1700
DALLAS, TEXAS 75240

March 19 19 87

PAY TO THE ORDER OF Pete DuPont for President Campaign $ 1,000.00

One thousand dollars & no/100---------- DOLLARS

MBank Lincoln Centre
8430 LBJ Freeway, Suite 100
Dallas, Texas 75240

FOR contribution

Harold Simmons

⑈0000 100000⑈

⑆930400933567

8420 LBJ FWY., SUITE 1700
DALLAS, TEXAS 752

April 15 19 87

PAY TO THE ORDER OF Dole Exploratory Committee $ 2,000.00

Two thousand dollars & no/100---------- DOLLARS

MBank Lincoln Centre 01 HS TX

FOR Contribution from Harold & Annette Simmons Harold T. Simmons

⑈0000200000⑈

930409335568

April 13 19 87

PAY TO THE ORDER OF Hatch Election Committee $ 2,000.00

Two thousand dollars & no/100---------- DOLLARS

MBank Lincoln Centre

FOR

Harold Simmons

⑈0000 200000⑈

⑆930400933569⑆

HAROLD SIMMONS

8430 LBJ FWY., SUITE 1
DALLAS, TEXAS 7

April 20 19 87

PAY TO THE ORDER OF Congressman Joe Barton Committee $ 1,000.00

One thousand dollars & no/100---------- DOLLARS

MBank Lincoln Centre

FOR

Harold Simmons

"0000 1000000"

930409335570

8430 LBJ FWY., SUITE 1700
DALLAS, TEXAS 75240

April 20 1987

PAY TO THE ORDER OF WTW Reelection Committee $ 5,000.00

Five thousand dollars & no/100---------- DOLLARS

MBank Lincoln Centre
8430 LBJ Freeway, Suite 160
Dallas, Texas 75240

PAID

FOR Harold & Annette Simmons

Harold Simmons

"0000500000"

930409335571

April 22 19 87

PAY TO THE ORDER OF Hecht Re-election Committee $ 4,000.00

Four thousand dollars & no/100---PAID NEXT BANK, NA--- --- DOLLARS

MBank Lincoln Centre
8400 LBJ Freeway, Suite 100
Dallas, Texas 75243

FOR Primary General Election from Harold & Annette Simmons

Harold Simmons

/0000400000/

930409335572

5400 LBJ FWY., SUITE 1700
DALLAS, TEXAS 75240

5/27 19 87

PAY TO THE ORDER OF Friends of Dick Armey $ 2,000.00

Two thousand and no/100 DOLLARS

MBank Lincoln Centre
5400 LBJ Freeway, Suite 100
Dallas, Texas 75240

FOR Contribution

Harold Simmons

⑈0000200000⑈

⑆930409335573⑆

DALLAS, TEXAS 75240

PAY TO THE ORDER OF Ortiz for Congress

5/26 19 87

$ 500.00

Five hundred and no/100 DOLLARS

MBank Lincoln Centre

FOR Donation

Harold Simmons

⑈000005000⑈

⑆930409335574⑆

8430 LBJ FWY., SUITE 1700
DALLAS, TEXAS 75240

5/15 19 87

PAY TO THE ORDER OF McKewen for Congress $ 500.00

Five hundred and no/100 DOLLARS

MBank Lincoln Centre
8440 LBJ Freeway, Suite 100
Dallas, Texas 75240

FOR Donation

Harold Simmons

⑈00000 50000⑈

⑆930409335575

DALLAS, TEXAS 75240

September 28 87

PAY TO THE ORDER OF Congressman [redacted] Bouter $ 1,000.00

One thousand dollars & no/100---------- DOLLARS

MBank Lincoln Centre
8400 LBJ Freeway
Dallas, Texas 75240

FOR _____

[redacted]

"0000100000"

9304093335576

DALLAS, TEXAS 75240

October 12 19 87

PAY TO THE ORDER OF George Bush for President $ 500.00

Five hundred dollars & no/100---------- DOLLARS

MBank Lincoln Centre
8400 LBJ Freeway
Dallas, Texas 75240

FOR _____

Harold W. Simmons

⑈00000 50000⑈

⑆930409335777

DEPOSIT TICKET

DATE 11-5 19 87

Checks and other items are received for deposit subject to the provisions of the Uniform Commercial Code or any applicable collection agreement.

32-382
1110

CURRENCY			
COIN			
CHECKS	Valley [redacted]	625	40
	[redacted]	1	20
	[redacted]	20	00
	[redacted]	109	26
	[redacted]	25	82
	[redacted]	48	14
TOTAL FROM OTHER SIDE		12	04
TOTAL		1864	26

USE OTHER SIDE FOR ADDITIONAL LISTING

MBank Lincoln Centre
[redacted]

HAROLD SIMMONS

MBank
LINCOLN CENTRAL
NOV 5 1987

.26

930400933578

HAROLD SIMMONS

[redacted]
[redacted], TEXAS 75240

Oct. 12 19 87

PAY TO THE ORDER OF Friends of David K. Karnes $ 1,000.00

One thousand dollars & no/100---------- DOLLARS

MBank Lincoln Centre
5400 LBJ Freeway
Dallas, Texas 75240

FOR

Harold Simmons

#0000100000#

930409335579

DATE Dec. 3 19 87

Checks and other items are received for collection subject to the provisions of the Uniform Commercial Code or any applicable collection agreement.

MBank Lincoln Centre

HAROLD SIMMONS

CURRENCY		
COIN		
CHECKS	Paul Trib	833.04
LIST SINGLY ALL ITEMS NOT CASH	LINCOLN CENTRE, N.A.	
TOTAL FROM OTHER SIDE		
TOTAL		1,458.04

USE OTHER SIDE FOR ADDITIONAL LISTING

140

930409335880

HAROLD SIMMONS

[redacted] TEXAS 75240

January 4 1988

PAY TO THE ORDER OF Lugar for Senate Committee $ 2,000.00

Two thousand dollars & no/100---------- DOLLARS

MBank Lincoln Centre
5400 LBJ Freeway
Dallas, Texas 75240

$1,000 Primary, $1,000 General
FOR Harold & Annette Simmons
Contribution

Harold Simmons

"0000 200000"

930400933581

8400 LBJ FRWY., SUITE 1700
[redacted]

Jan 21 19 88

PAY TO THE ORDER OF Republican Senatorial Inner Circle $ 2,000.00

Two thousand dollars & no/100---------- DOLLARS

MBank Lincoln Centre
8400 LBJ Freeway
Dallas, Texas 75240

FOR Mr. & Mrs. Harold Simmons Membership for 1988

Harold C. Simmons

⑈0000 200000⑈

⑆30400933582

8430 [illegible] FRWY., SUITE 1700
[illegible], TEXAS 75240

Jan. 27 19 88

PAY TO THE ORDER OF Steve Bartlett Congressional Campaign Committee $ 1,000.00

One thousand dollars & no/100 DOLLARS

MBank Lincoln Centre
8400 LBJ Freeway
Dallas, Texas 75240

FOR [illegible] David W. Simmons

⑈0000100000⑈

⑆930400933583

[redacted] FRWY., SUITE 1700
[redacted], TEXAS 75240

January 29, 88

PAY TO THE ORDER OF John D. Dingell for Congress Committee $ 1,000.00

One thousand dollars & no/100---------- DOLLARS

MBank Lincoln Centre
[redacted] LBJ Freeway
Dallas, Texas 75240

FOR _____

[redacted]

#0000100000#

9300409335584

841

SIMMONS

8400 LBJ FRWY., SUITE 1700
DALLAS, TEXAS 75240

Jan. 15 19 88

PAY TO THE ORDER OF Ed Markey for Congress Committee $ 500.00

Five hundred dollars & no/100---------- DOLLARS

MBank Lincoln Centre
8400 LBJ Freeway
Dallas, Texas 75240

FOR Contribution

Harold A. Simmons

"00000 50000"

930400933585

8400 LBJ FRWY., SUITE 1700
LAS, TEXAS 75240

Jan. 22 19 88

PAY TO THE ORDER OF Ed Markey for Congress Committee $ 500.00

Five hundred dollars & no/100---------- DOLLARS

MBank Lincoln Centre
8400 LBJ Freeway
Dallas, Texas 75240

FOR _____

Brenda L. Summers

#00000 50000#

9300409335586

5430 LBJ FWY., SUITE 1700
DAL TEXAS 75240

January 29 19 88

PAY TO THE ORDER OF Pete Dawkins for Senate $ 1,000.00

One thousand dollars & no/100---------- DOLLARS

MBank Lincoln Centre
5400 LBJ Freeway
Dallas, Texas 75240

FOR Fly

Harold Simmons

"0000100000"

930409335887

8400 LBJ FRWY., SUITE 1700
DA[illegible], TEXAS 75240

January 12 19 88

PAY TO THE ORDER OF Danforth for Senate $ 500.00

Five hundred dollars & no/100---------- DOLLARS

MBank Lincoln Centre
8400 LBJ Freeway
Dallas, Texas 75240

FOR

Harold Simmons

⑈00000 50000⑈

⑆930400933 5888

HAROLD SIMMONS

[redacted], TEXAS 75240

January 29 1988

PAY TO THE ORDER OF Gore for President Committee $ 1,000.00

One thousand dollars & no/100---------- DOLLARS

MBank Lincoln Centre
[redacted]
Dallas, Texas 75240

FOR [redacted]

Harold Simmons

"0000600000"

930409335389

5430 LBJ FRWY., STE. 1700
DALLAS, TEXAS 75240

Feb. 18 19 88

PAY TO THE ORDER OF CATPAC $ 5,000.00

Five thousand dollars & no/100---------- DOLLARS

MBank Lincoln Centre
5430 LBJ Freeway
Dallas, Texas 75240

FOR _____

"0000500000"

930409335590

DALLAS, TEXAS 75240

Feb. 1 19 88

PAY TO THE ORDER OF Voinovich for Senate Committee $ 1,000.00

One thousand dollars & no/100---------- DOLLAR

MBank Lincoln Centre
5400 LBJ Freeway
Dallas, Texas 75240

FOR

Harold Simmons

#0000100000

930409335591

.S. PKWY., STE. 1700
LLAS, TEXAS 75240

March 1 19 88

PAY TO THE ORDER OF Rick Montova for U.S. Senate Committee $ 2,000.00--

Two Thousand and no/100 - DOLLARS

MBank Lincoln Centre
5400 LBJ Freeway
Dallas, Texas 75240

Harold Simmons

FOR $1,000--Annette Simmons

"0000 200000"

930409335592

8430 LBJ FRWY., STE. 1700
, TEXAS 75240

arch 24 19 88

PAY TO THE ORDER OF Texans for Beau Boulter $ 1,000.00

One thousand dollars & no/100---------- DOLLARS

MBank Lincoln Centre
8430 LBJ Freeway
Dallas, Texas 75240

Harold Simmons

FOR

⑈0000 100000⑈

9304093335593

3430 LBJ FRWY., STE. 1700
LAS. TEXAS 75240

March 25 19 88

PAY TO THE ORDER OF WSS PAC $ 5,000.00

Five thousand dollars & no/100---------- DOLLARS

MBank Lincoln Centre
3400 LBJ Freeway
Dallas, Texas 75234

FOR _____

Harold Simmons

⑈0000500000⑈

⑆30400933594

1111

LAS, TEXAS 75240

April 13 19 88

PAY TO THE ORDER OF Michel for Congress $ 1,000.00

One thousand dollars & no/100---------- DOLLARS

MBank Lincoln Centre
8400 LBJ Freeway
Dallas, Texas 75240

FOR

Harold Simmons

"0000100000"

9304093355995

8430 I 8J FRWY., STE. 1700
[redacted], TEXAS 75240

April 29 19 88

PAY TO THE ORDER OF Haig for President $ 1,000.00

One thousand dollars & no/100---------- DOLLARS

MBank Lincoln Centre
8400 LBJ Freeway
Dallas, Texas 75240

FOR

Harold Simmons

"0000 100000"

930400933596

5420 LBJ FRWY., STE. 1700
DALLAS, TEXAS 75240

May 31 19 88

PAY TO THE ORDER OF Jeffords-Mack Victory Committee $ 2,000.00

Two thousand dollars & no/100---------- DOLLARS

MBank Lincoln Centre
5420 LBJ Freeway
Dallas, Texas 75240

FOR _____

Harold Simmons

⑈0000200000⑈

⑆930409335597⑆

9330 LBJ FRWY., STE. 1700
DALLAS, TEXAS 75240

May 26 19 88

PAY TO THE ORDER OF Friends of Denny Smith $ 1,000.00

One thousand dollars & no/100---------- DOLLARS

MBank Lincoln Centre
9400 LBJ Freeway
Dallas, Texas 75240

05-01-88 [illegible]

Harold Simmons

FOR _____

"0000100000"

9300409335598

9430 LBJ FRWY., STE. 1700
DA[redacted] TEXAS 75240

May 24 19 80

PAY TO THE ORDER OF George Bush for President $ 500.00

Five hundred dollars & no/100---------- DOLLARS

MBank Lincoln Centre
9400 LBJ Freeway
Dallas, Texas 75240

FOR _____

Harold Simmons

⑈00000 50000⑈

9304093335999

[redacted], TEXAS 75240

June 15 1988

PAY TO THE ORDER OF Synar for Congress Committee $ 500.00

Five hundred dollars & no/100---------- DOLLARS

MBank Lincoln Centre
[redacted]
Dallas, Texas 75240

FOR [redacted]

Harold Simmons

"00000 50000"

9304093360 00

DALLAS, TEXAS 75240

June 23 19 98

PAY TO THE ORDER OF Conservative Victory Committee $ 5,000.00

Five thousand dollars & no/100---------- DOLLARS

MBank Lincoln Centre
8400 LBJ Freeway
Dallas, Texas 75240

FOR _____

Harold Simmons

"0000500000"

930409336601

9430 LBJ FRWY., STE. 1700
DALLAS, TEXAS 75240

June 17 19 88

PAY TO THE ORDER OF Williams for Congress '88 $ 500.00

Five hundred dollars & no/100---------- DOLLARS

MBank Lincoln Centre
9400 LBJ Freeway
Dallas, Texas 75240

FOR _____

Harold Simmons

⑈00000 50000⑈

⑆930409336⑆02

[redacted] TEXAS 75240

July 13 19 88

PAY TO THE ORDER OF Congressman Joe Barton Committee $ 1,000.00

One thousand dollars & no/100---------- DOLLARS

MBank Lincoln Centre
8400 LBJ Freeway
Dallas, Texas 75240

FOR _____

Harold Simmons

⑈0000 100000⑈

⑆930400933603⑆

5430 LBJ FRWY., STE. 1700
D[illegible]S, TEXAS 75240

June 30 19 88

PAY TO THE ORDER OF Friends of Slade Gorton $ 1,000.00

One thousand dollars & no/100---------- DOLLARS

MBank Lincoln Centre
5430 LBJ Freeway
Dallas, Texas 75240

FOR _____

[signature]

"0000100000"

930409336004

DC

8430 LBJ FRWY., STE. 1700
DALLAS, TEXAS 75240

July 15 19 88

PAY TO THE ORDER OF People for John Heinz Committee $ 2,000.00

Two thousand dollars & no/100---------- DOLLARS

MBank Lincoln Centre
8430 LBJ Freeway
Dallas, Texas 75240

FOR Harold & Annette Simmons

Harold Simmons

"0000 200000"

930409336605

5430 LBJ FRWY., STE. 1700
[redacted] TEXAS 75240

August 12 1988

PAY TO THE ORDER OF CAT/PAC $ 5,000.00

Five thousand dollars & no/100---------- DOLLARS

MBank
Lincoln Centre Office 5430 LBJ Frwy.
Dallas, Texas 75240 385-1430

FOR

[redacted]

"0000500000"

930409336006

[redacted] FRWY., STE. 1700
[redacted], TEXAS 75240

September 26, 1988

PAY TO THE ORDER OF John Bryant Campaign $ 1,000.00

One thousand dollars & no/100---------- DOLLARS

MBank

Uptown Centre Office 5400 LBJ Freeway
Dallas, Texas 75240 233-7400

FOR _____

Harold Simmons

#0000 100000#

9304093336607

LBJ FRWY., STE. 1700
AS, TEXAS 75240

Dec. 20 19 88

PAY TO THE ORDER OF Pete Dawkins for U. S. Senate $ 500.00

Five hundred dollars & no/100 DOLLAR

MBank
Lincoln Centre Office 5400 LBJ Fwy
Dallas, Texas 75240 980-5400

FOR

Harold Simmons

⑈00000 50000

⑆930409336⑈08

PAY TO THE ORDER OF Friends of Danny Smith

May 5 19 89

$ 1,000.01

One thousand dollars & no/100---------- DOLL

MBank

FOR _____

Harold Simmons

"0000 10000

930409336009

June 14 1989

PAY TO THE ORDER OF Friends of Bennie Mack $ 1,000.00

One thousand dollars & no/100---------- DOLLA

MBank

FOR _____ Harold Simmons

"0000100000

930409336 10

DALLAS, TEXAS 75[illegible]

March 30 19 89

PAY TO THE ORDER OF Republican Se[illegible]orial Inner Circle $ 1,000.00

One thousand dollars &no/100---------- DOLLAR

MBank

Union Square Office [illegible]

FOR [illegible]

[illegible]

⑈0000100000

⑆930409336⑈11

PAY TO THE ORDER OF Democratic [redacted]torial Campaign May 24 19 89

Fifteen thousand dollars & no/100---------- $ 15,000.0

MBank

FOR _____ Harold Simmons

'000150000'

930409336 12

Nov 13 1985

PAY TO THE ORDER OF Contran Political Action Committee $ 5,000.00

Five thousand dollars & no/100---------- DOLLARS

MBank

Lincoln Square Office 6400 LBJ Frwy. Dallas, Texas 75240 (214) 960-7000

FOR _____ Harold Simmons

⑈0000 500000⑈

⑆930409336613⑆

PAY TO THE ORDER OF Small BIZ PAC

Nov. 14 1989

$ 5,000.00

Five thousand dollars & no/100---------- DOLLA

MBank

FOR

Harold Simmons

#0000 500000

930409336 14

1671

HAROLD SIMMONS

8400 LB
DALLAS, TEXAS 75240

DEC. 27 88-440

PAY TO THE ORDER OF Republican National Committee $ 100.00

One hundred dollars & no/100---------- DOLLARS

MBank
Lemmon Corner Office 8400 LBJ Frwy
Dallas, Texas 75243 234-7400

FOR

Harold Simmons

⑈00001 0000⑈

⑆930409336⑆15

[redacted]

[redacted] 20-10
May 25 19 88

PAY TO THE ORDER OF The Republican National Committee $ 100.00

One hundred dollars & no/100---------- DOLLARS

MBank Lincoln Centre
[redacted]

FOR 1988 Membership

Harold Simmons

⑈00000100000⑈

930409336 16

9400 LBJ FWY., SUITE 170
DALLAS, TEXAS 75240

PRIGHT VC

March 27 19 87

PAY TO THE ORDER OF Steve Bartlett Congressional Campaign Committee $ 100.00

One hundred dollars & no/100 DOLLARS

RECEIVED
MAR 30 1987

MBank Lincoln Centre
9400 LBJ Freeway, Suite 170
Dallas, Texas 75240

Steve Bartlett
Congressional Campaign Committee

FOR

Harold Simmons

⑈00000 $0000⑈

⑆930400933617

06C7974

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

90 SEP 25 AM 10:15

100 Crescent Court
Suite 1700
Dallas, Texas 75201
(214) 871-8400

HAND DELIVERED

September 24, 1990

VIA FEDERAL EXPRESS

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 SEP 25 AM 11:36

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

Attention: Frances B. Hagan:

Re: MUR 3104; Caroline Rose Hunt

Dear Ms. Hagan:

Pursuant to my letter dated September 14, 1990, enclosed is a copy of a letter from Congressman Dick Armey's campaign confirming that there was no $2,000 contribution received from Caroline Rose Hunt for the period in question.

Please call me at 214/871-8428 if you have any questions or I may be of further assistance.

Very truly yours,

C. Jedson Nau

C. Jedson Nau, Attorney

CJN/cac

Enclosure

9304093361 8

CONGRESSMAN DICK ARMEY
26TH DISTRICT OF TEXAS

September 23, 1990

Mrs. Caroline Rose Hunt
100 Crescent Court
Suite 1700
Dallas, Texas 75201

Attn: Jed Nau

Dear Mrs. Hunt,

I was contacted recently by Mr. Jed Nau regarding a question he had concerning a contribution record which appeared on an FEC report for 1987.

It is my understanding the Report indicates that you made a contribution to Congressman Dick Armey in June of 1987 but your records do not show such a contribution. After a thorough review of of our files, I find no record of a contribution made by you during the period in question.

While our records indicate contributions from other individuals with the last name of Hunt, none were from Caroline Rose Hunt. I trust this information will serve to clarify your concerns and to help resolve any dispute with the Federal Election Commission.

If you have further questions or need additional information, please do not hesitate to contact me at 214/434-2454.

Sincerely,

Lisa K. Ozee

LISA K. OZEE
Campaign Manager

930409336619

DICK ARMEY CAMPAIGN COMMITTEE P.O. BOX 85 LEWISVILLE, TEXAS 75067
PAID FOR BY THE DICK ARMEY CAMPAIGN COMMITTEE
CONTRIBUTIONS ARE NOT DEDUCTIBLE AS CHARITABLE CONTRIBUTIONS FOR FEDERAL INCOME TAX PURPOSES

OGC 7991

#18 #3

SKADDEN, ARPS, SLATE, MEAGHER & FLOM
1440 NEW YORK AVENUE, N.W.
WASHINGTON, D.C. 20005-2107

FAX: (202) 393-5760
DIRECT DIAL
(202) 371-

(202) 371-7000

BOSTON
CHICAGO
HONG KONG
LONDON
LOS ANGELES
NEW YORK
SYDNEY
SAN FRANCISCO
TOKYO
WILMINGTON

September 26, 1990

BY HAND

Lawrence M. Noble, Esq.
General Counsel
Federal Election Commission
999 E Street, Northwest
Washington, D.C. 20463
Attn: Frances B. Hagan

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 SEP 26 PM 5:11

Re: MUR 3104 - Respondent: Ronald O. Perelman

Dear Mr. Noble:

This letter is submitted on behalf of Ronald O. Perelman in response to the finding of the Federal Election Commission ("FEC" or "Commission") in the above-referenced matter. Preliminarily, as counsel for the respondent, we object to the procedure in this matter. Had we been afforded an opportunity to submit our position to the Commission prior to a finding of reason to believe, this matter might have been avoided saving the resources of both the Commission and the respondent. Reason to believe having been found without providing this opportunity, we submit this preliminary response to the Commission's finding of reason to believe and its request for information.

The Commission's Factual and Legal Analysis alleges that the respondent made contributions to federal candidates and political committees in excess of the 1988 annual contribution limit by $7,500. In response to the Commission's request for information, we have attached copies of both sides of canceled checks and solicitation materials pertaining to the list of contributions identified in the Factual and Legal Analysis. (Attachment A.) We further note that the respondent has no record of making any contributions of less than $500 pertaining to the 1988 election.

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Based on the information provided in response to the Commission's request for information, the additional documentation attached, and the arguments made herein, the Commission should exclude the following contributions from the respondent's 1988 calendar year limit: (1) Republican National Committee ("RNC") - $5,000; (2) Bill Green for Congress - $1,000; (3) Biden for President - $1,000; and (4) Moynihan Committee - $2,000. If the computation in the Factual and Legal Analysis is adjusted accordingly, the respondent's 1988 contribution total would be $23,500, $1,500 under the limit.* Accordingly, the Commission should find no probable cause a violation occurred.

Should the Commission conclude that the respondent exceeded the calendar limit, we ask that the following mitigating circumstances be considered: (1) respondent sought and obtained refunds; and (2) respondent did not come close to the contribution limit in any calendar year other than 1988. In fact, the respondent was so far below the limit in 1987 and 1989 that the entire $10,000 contribution to the Democratic Senatorial Campaign Committee could have been made in either year. Thus, the issue comes down to the timing of the contributions rather than the amount of the contributions. For all of these reasons, even if the reason to believe finding were supportable, the Commission should take no further action with regard to the respondent.

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* We note that on a straight calendar year basis, the respondent only contributed $23,500 in 1988 and $11,000 in 1987, even if all the contributions listed in the FEC schedules are counted as contributions for federal elections. This is true even if the Commission includes in the straight calendar year computation contributions made to candidates running in 1990.

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Exclusion of Specific Contributions

(1) Republican National Committee

The respondent has no record of making a contribution to the RNC or the Republican National Finance Committee, the entities identified on the FEC printout of respondent's contributions. (See Attachment B - FEC printout of Ronald O. Perelman's contributions.) On June 24, 1988, the respondent, however, made a $5,000 contribution to an entity or account called "The Presidential Trust," which was apparently deposited into an RNC federal election account. (See Attachment A(16) - copy of contribution check.) According to the Presidential Trust solicitation materials, a contributor to the Presidential Trust could attend a dinner with then Vice President and Mrs. George Bush. (See Attachment A(16) - copies of the Presidential Trust solicitation materials.) As was often Mr. Perelman's practice when making a political contribution, it was reviewed by Richard Halperin. Richard Halperin is the Senior Vice President of MacAndrews & Forbes Group Incorporated and Special Counsel to Ronald O. Perelman, Chairman of MacAndrews & Forbes Group Incorporated. As stated in Mr. Halperin's affidavit, at the time he authorized and decided that the contribution be made, he believed that the Presidential Trust contribution was a contribution to a non-federal account. (See Attachment C - Halperin affidavit.)

Mr. Halperin's confusion concerning the Presidential Trust contribution is understandable in view of prior contributions he had authorized. Beginning in 1986, through to the present year, Mr. Halperin authorized contributions every Spring to an RNC sponsored presidential dinner. In 1988, however, instead of authorizing a contribution to the Presidential Dinner, Mr. Halperin authorized the contribution to the Presidential Trust, which was featured as a vice-presidential dinner. It turned out, however, that the Presidential Trust contribution made in 1988 went to a federal account and the President's Dinner contributions in the other years went to non-federal accounts. It is not obvious from the solicitation materials received by Mr. Perelman, as compared with numerous other solicitations to both federal and non-federal accounts, that the Presidential Trust

dinner contribution counted toward the $25,000 annual limit on federal contributions. When Mr. Halperin learned that the Presidential Trust contribution was made to a federal account, he obtained a refund and "redonated" the funds to a non-federal account consistent with his original intent. (See Attachment D - refund check.)

A similar situation arose in MUR 1059 (Respondent: H.E. Chiles). In that case, the respondent intended to make a contribution to an RNC non-federal election account (the building fund) but the contribution was deposited into a federal account. The Commission, however, gave the contributor the benefit of the doubt and did not count the contribution as a federal contribution. As was the case in MUR 1059, Mr. Halperin in this case received several solicitations from the RNC for the federal election account and several solicitations for the non-federal election account. Because of the annual Spring giving to an RNC-sponsored presidential dinner that had been made to a non-federal election account prior to 1988, Mr. Halperin thought this was the same annual event. The payee on the contribution checks to the non-federal election account was "The President's Dinner," the payee on the contribution check in this case was "The Presidential Trust." As a consequence of this understandable confusion and because the contribution was intended for a non-federal election account, the Commission should not count the Presidential Trust contribution against Mr. Perelman's 1988 annual federal limit.

(2) Bill Green for Congress

On March 6, 1987, the respondent made a $1,000 contribution to the Committee for Congressman Bill Green ("Green Committee"). The purpose of the contribution was to join what Congressman Green calls his Congressional Club even though the funds are used for campaign purposes. Although the respondent made contributions to the Green Committee on February 11, 1987, and March 6, 1987, and it appears that the Green Committee intended to apply both contributions for 1986 debt retirement, the General Counsel has treated only the February contribution as a 1986 contribution. Indeed, the FEC public record shows both contributions as being made "For 1986." (See Attachment B - FEC computer printout.) Moreover, when the

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Green Committee accepted the March contribution from the respondent, it had sufficient outstanding net debt to apply the respondent's contribution to the 1986 campaign deficit. For this reason alone, the Commission should not count the March 1987 contribution to the Green Committee against Mr. Perelman's 1988 annual limit. There is an additional reason, however, not to charge Mr. Perelman's 1988 limit with the March 1988 Green Committee contribution. At the time of this contribution, the FEC's regulations concerning post-general election contributions were ambiguous.

When the Green Committee accepted the respondent's March 1987 contribution, the Commission's regulations did not address the handling of post-general election contributions in the way it addressed post-primary contributions. With regard to contributions received after the primary election but before the general election, the former regulations at 11 C.F.R. § 110.1(a)(2)(i) stated that such contributions must be designated by the contributor in writing in order to count the contribution toward the limit for the primary election that had just occurred (assuming there was a primary election debt). Otherwise the contribution would be applied to the general election. There was no similar regulation with respect to contributions received after the general election. In fact, the former regulations did not require a contribution received after the general election to be designated in writing by the contributor for the preceding election. Under 11 C.F.R. § 102.9(e), the recipient campaign could choose to designate the contribution to a prior campaign as long as the prior campaign had a net debt in excess of the amount of the contribution even without the contributor's written designation.

Soon after the respondent made the March contribution to the Green Committee, the Commission revised its regulations at 11 C.F.R. § 102.9(e) and 11 C.F.R. § 110.1(a)(2)(i). The revised regulations clarified that a campaign committee receiving a post-general election contribution may not redesignate that contribution without the contributor's written designation. The Explanation and Justification to the revised regulations for section 102.9(e) states that the purpose of the revised

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regulations was to correct a defect in the former regulations that allowed the recipient campaign to redesignate a post-general election contribution without the contributor's written designation. Thus, prior to the change in the regulations, regardless of the contributor's intent, the recipient campaign committee could designate a contribution as a contribution to a prior election as long as the campaign committee had net outstanding debt.

Based on the language of FEC's prior regulations, the FEC report noting that Mr. Perelman's contributions were for the "'86 deficit," and the FEC's computer-generated schedules showing the 1987 contributions as contributions "For 1986," the Commission should count the March 1987 contribution to the Green Committee against Mr. Perelman's 1986 calendar year limit.*

(3) Biden for President

On June 25, 1987, the respondent made a $1,000 contribution to Biden for President. On September 23, 1987, Senator Biden publicly withdrew from the presidential race and ceased to campaign for the presidency. (See Attachment E - copy of press report). It is anomalous and contrary to the FEC's regulations to count a contribution as being made in 1988 when the contribution, in fact, was made in 1987 to a candidate who renounced his candidacy in 1987 and never ran for election in 1988. The logic of applying the Biden for President contribution to the respondent's 1987 annual limit instead of the 1988 limit is supported by the FEC's dual candidacy regulations (former 11 C.F.R. § 110.3(a)(2)(v)(A), currently 11 C.F.R. § 110.3(c)(5)(i)(A)) when read in pari materia with the FEC's regulations on the $25,000 calendar year limit (formerly 11 C.F.R. § 110.5(b)(1), currently 11 C.F.R. 110.5(c)(2)).

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* As for the 1986 "per election" limits, the contributor can only be held accountable for contributions he gave during the 1986 cycle or designated in writing for the 1986 election.

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After abandoning the nomination for the presidency in 1987, Senator Biden was free to transfer his presidential campaign contributions to his 1990 senatorial campaign committee. The Commission's regulations state that if an individual is a candidate for two offices, he may transfer funds from one campaign committee to another if he is not actively seeking election to more than one office. Under section 110.3(c)(5)(ii) (formerly 11 C.F.R. § 110.3(a)(2)(v)(B)), contributions made to the abandoned transferor campaign are treated as if they were made to the transferee campaign. Thus, when Senator Biden publicly announced, in 1987, that he was no longer seeking the presidential nomination, those presidential campaign funds lost their character as 1988 contributions prior to calendar year 1988.

The FEC's regulations pertaining to the $25,000 annual limit stated that a contribution counts against a contributor's annual limit if the contribution is made in a year other than in the calendar year in which an election is held if the contribution is made with respect to a particular candidate and election (former 11 C.F.R. § 110.5(b)(1) revised in 1990 at 11 C.F.R. § 110.5(c)(2)). Pursuant to former section 110.5(b)(1), a contributor cannot make a contribution with respect to an election in an election year if a candidate publicly renounces his campaign under section 110.3(a)(2)(v)(B) prior to the election year. Thus, the abandonment of the campaign resulted in the abandonment of the use of those campaign funds for actively seeking nomination or election to office in the 1988 election.

Moreover, it is inconsistent to consider contributions made to the abandoned campaign as contributions counting against a contributor's 1988 annual year limit, the year of the election of the transferor committee, and have that same contribution count toward that contributor's 1990 per election limit upon transfer to a 1990 committee. Conversely, if the funds are not transferred, as in this case, and the presidential campaign is abandoned prior to the election year, those funds should not be treated as 1988 contributions for purposes of the annual year contributor limit.

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To avoid the anomalous result of counting contributions against a contributor's annual limit in a year that the recipient candidate never ran, the contributions made to that campaign should count against the contributor's annual limit in the calendar year in which the funds were contributed.

(4) Moynihan Contributions

The FEC's contributor index shows that Mr. Perelman contributed to the Moynihan Committee in January 1987. (See Attachment B - FEC computer printout.) As shown on the enclosed checks made out to the Moynihan Committee, the respondent made a $2,000 contribution in December 1986. (See Attachment A(1) - Copies of checks to the Moynihan Committee). Based on the Commission's treatment of prior MURs involving the $25,000 limit, if a contribution exceeded the annual limit in, for example, 1988, the Commission would not attempt to attribute the contributor's 1988 calendar year limit to a contribution made before 1987, i.e., beyond the election cycle. (See Attachment F - an example of an internally generated referral sheet from the Reports Analysis Division involving an alleged $25,000 annual limit violation.)

In this case, the respondent made a contribution to the Moynihan Committee in 1986, and Senator Moynihan did not publicly announce his reelection bid until 1988. (See Attachment G - a copy of Senator Moynihan's 1988 solicitation materials.) While Senator Moynihan was technically a candidate for the 1988 election in 1986, it is unreasonable to expect an individual contributing to a campaign to realize that a 1986 contribution will count towards his 1988 calendar year limit. Consequently, as a matter of fairness, the Commission should take into consideration this unprecedented application of the $25,000 annual limit provision and not count the contribution to the Moynihan Committee towards respondent's 1988 annual limit.

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Mitigating Circumstances the Commission Should Take Into Consideration in Dismissing This Matter.

Although the arguments made demonstrate that the Commission should find no probable cause that the respondent exceeded the 1988 annual limit, if the Commission continues to contend that the respondent may have exceeded the limit, we request that the Commission consider the following mitigating factors.

(1) Refunds Sought and Obtained

The respondent received a refund of $5,000 from the RNC for The Presidential Trust contribution. (See Attachment D - refund check.) In addition, the respondent has sought a $5,000 refund from the Democratic Senatorial Campaign Committee. The respondent hopes that this additional and abundantly cautious step in attempting to mitigate this situation will be taken into consideration in dismissing this matter.

(2) Respondent Has Not Come Close to the Limit in Other Years.

The respondent has never come close to the calendar year limit in any year other than 1988. As mentioned at the outset, the respondent's contribution of $10,000 to the Democratic Senatorial Campaign Committee could have been made in either 1987 or 1989. The total contributions made by the respondent over the 1987-1988 election cycle fall well below the $50,000 allowed over the election cycle. Moreover, in prior MURs, the Commission, after finding reason to believe, has taken no further action against respondents who have exceeded the limits in amounts far in excess of the amount involved in this case. See MURs 1893 (In Re J. Valenti) and 1526 (In Re M. Cogan). In fact, in no case has the Commission sought a civil penalty in a matter involving the extenuating circumstances described herein.

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For reasons stated, the Commission should find no probable cause that the respondent exceeded the 1988 annual limit, or in the alternative, the Commission should take no further action and dismiss this case.

Sincerely,

Kenneth A. Gross

Attachments

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FEDERAL ELECTION COMMISSION

Attachment A	Copies of both sides of canceled checks and some solicitation materials concerning the contributions listed in the attachment to the Commission's reason to believe finding.
1	The Moynihan Committee
2	Committee for Congressman Green
3	Friends of Tom Lantos
4	Friends of Gary Hart
5	Metzenbaum for Senate
6	Biden for President
7	Gephardt for President
8	Dole for President
9	Pete Dawkins for Senate
10	Albert Gore for President
11	Democratic Senatorial Campaign Committee
12	Licht '88 Committee
13	Riegle for Senate Committee
14	McCarthy for Senate
15	Californians for Pete Wilson
16	The Presidential Trust
17	Dukakis for President
Attachment B	FEC Printout of Ronald O. Perelman's contributions
Attachment C	Affidavit of Richard E. Halperin
Attachment D	Refund Check
Attachment E	Congressional Quarterly Report on Senator Biden's Withdrawal from the Presidential Race
Attachment F	Sample Reports Analysis Division Internal Referral Sheet
Attachment G	Copy of The Moynihan Committee's 1988 Solicitation Materials

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Attachment A

Copies of both sides of canceled checks and some solicitation materials concerning the contributions listed in the attachment to the Commission's reason to believe finding.

1. The Moynihan Committee
2. Committee for Congressman Green
3. Friends of Tom Lantos
4. Friends of Gary Hart
5. Metzenbaum for Senate
6. Biden for President
7. Gephardt for President
8. Dole for President
9. Pete Dawkins for Senate
10. Albert Gore for President
11. Democratic Senatorial Campaign Committee
12. Licht '88 Committee
13. Riegle for Senate Committee
14. McCarthy for Senate
15. Californians for Pete Wilson
16. The Presidential Trust
17. Dukakis for President

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Attachment A

1. The Moynihan Committee

9304093336332

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654

RONALD O. PERELMAN
36 EAST 63RD STREET
NEW YORK, NY 10021

1468

Dec 31, 1986

1-231
2103

PAY TO THE ORDER OF The Keynes Committee, Inc $2,000

Two Thousand and 00/100 DOLLARS

CHASE

The Chase Manhattan Bank, N.A.
726 Madison Avenue at
64th Street
New York, N.Y. 10021

MEMO

Ronald Perelman

RICHARD E. HALPERIN
36 EAST 63RD STREET
NEW YORK, NEW YORK 10021

31 December 1986

Mr. John Westergaard
The Moynihan Committee
Westergaard Fund
540 Madison Avenue - Fourth Floor
New York, N.Y. 10022

Dear John:

On behalf of Revlon's Chairman, Ronald O. Perelman, it is a pleasure to support Senator Moynihan.

Pat has consistently provided outstanding leadership on many important issues in the Senate.

Please keep us advised on Pat's future activiteis.

Warmest personal regards,

Sincerely,

Richard E. Halperin

Enclsoure: Moynihan Committee Inc. - $2000.00

RONALD O. PERELMAN
36 EAST 63RD STREET
NEW YORK, NY 10021

1468

Dec. 31, 1986

1-231
2103

PAY TO THE ORDER OF The Moynihan Committee, Inc. $2,000

Two Thousand and 00/100 DOLLARS

CHASE

The Chase Manhattan Bank, N.A.
726 Madison Avenue at
64th Street
New York, N.Y. 10021

MEMO

930409336334

Attachment A

2. Committee for Congressman Green

9304093336335

930409336336

032

RONALD O. PERELMAN

1727

March 6 19 87

1-291
2

PAY TO THE ORDER OF Committee for Congressman Green $ *1,000.00

*One thousand and NO/100 DOLLARS

CHASE

The Chase Manhattan Bank, N.A.
726 Madison Avenue at
64th Street
New York, N.Y. 10021

MEMO renewal for membership in club

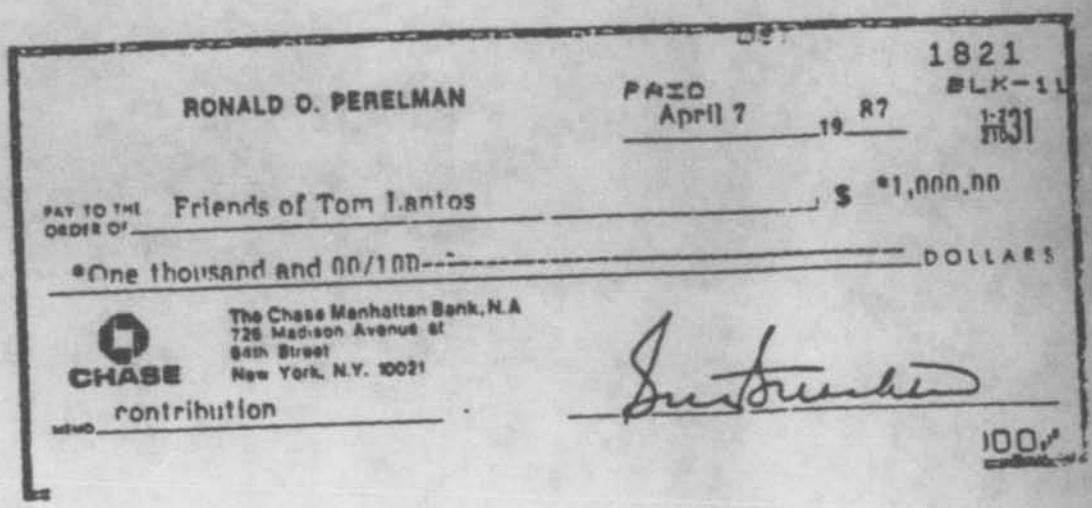
Ronald Perelman

000

Attachment A

3. Friends of Tom Lantos

93040933637



RONALD O. PERELMAN

1821

BLK-1L

PAID April 7 19 87

1-231
2131

PAY TO THE ORDER OF Friends of Tom Lantos $ *1,000.00

*One thousand and 00/100---------- DOLLARS

CHASE

The Chase Manhattan Bank, N.A.
726 Madison Avenue at
64th Street
New York, N.Y. 10021

MEMO contribution

100%

930409336638

Attachment A

4. Friends of Gary Hart

93040933639

RONALD O. PERELMAN
36 EAST 63RD STREET
NEW YORK, NY 10021

PAID

1996
BLK-1:

April 24 19 87

PAY TO THE ORDER OF Friends of Gary Hart $ *1,000.00

*One thousand and no/100---------- DOLLARS

CHASE
The Chase Manhattan Bank, N.A.
726 Madison Avenue at
64th Street
New York, N.Y. 10021

MEMO donation EVNY07,ECNY16

930400933640

The
Friends of Gary Hart
cordially invite you to join
Lee and Gary Hart
at
A Gala Dinner
on
Tuesday, May 5, 1987
at the
Sheraton Centre Hotel
Seventh Avenue at 52nd Street
Cocktails at 6:15
Dinner at 7:15

Business attire

RSVP

Miriam J Ornstein
Maurice S Paprin
Donald A Petrie
Hon Peter Peyser
Andrew Reegen
Douglas P Rosen
John Ryan
Loulette Samuels
Theodore C Sorensen
Howard M Squadron
Peter Stone
Zane Tankel
Jeffries W Tindell
Donald J Trump
Peter Tufo
Charles Uribe
Amy Vance
Katrina vanden Heuvel
Matthew Wanning
Cecille & Herbert Wasserman
Bruce Wasserstein
(Committee in formation)

930409336411

RONALD O. PERELMAN
36 EAST 63RD STREET
NEW YORK, NY 10021

1996

April 24 19 87

1-23
213

PAY TO THE ORDER OF Friends of Gary Hart $ *1,000.00

*One thousand and no/100 DOLLAR

The Chase Manhattan Bank, N.A.
726 Madison Avenue at
64th Street
New York, N.Y. 10021

CHASE

MEMO donation

Ron Perelman

Attachment A

5. Metzenbaum for Senate

9304093364 2

930400933643

2139

RONALD O. PERELMAN
38 EAST 63RD STREET
NEW YORK, NY 10021

June 5 19 87

1-231
210

PAY TO THE ORDER OF Howard Metzenbaum for Senator $ *1000.00

One thousand and no/100 DOLLARS

CHASE

The Chase Manhattan Bank, N.A.
736 Madison Avenue at
64th Street
New York, N.Y. 10021

MEMO contribution

Ron Perelman

00

Attachment A

6. Biden for President

93040933644

930409336645

RONALD O. PERELMAN
36 EAST 63RD STREET
NEW YORK, NY 10021

2258

June 25 19 87

1-231
2116

PAY TO THE ORDER OF Biden for President $ 1,000.00

One thousand & no/100 DOLLARS

CHASE
The Chase Manhattan Bank, N.A.
726 Madison Avenue at
64th Street
New York, N.Y. 10021

MEMO ROP contribution

Ron Perelman

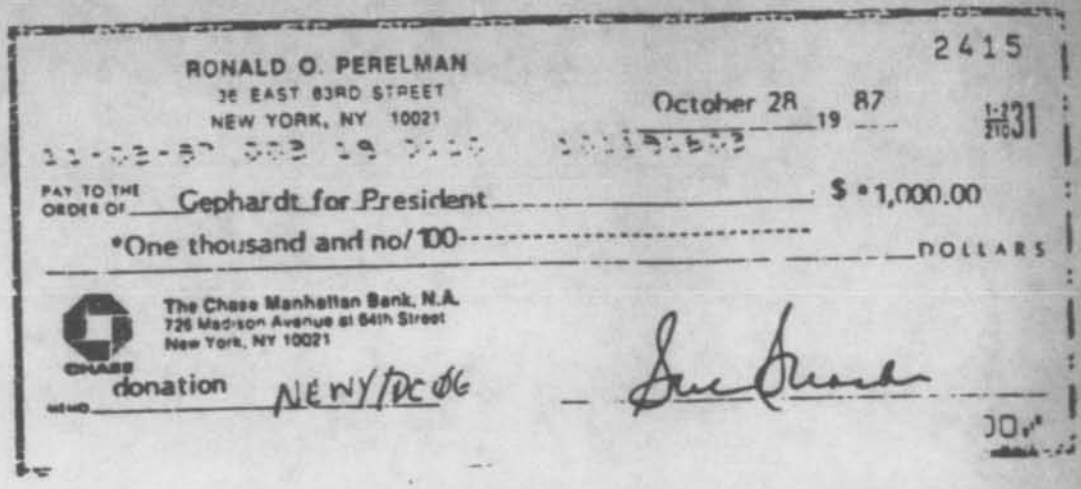
000

Attachment A

7. Gephardt for President

9304093336446

9300409336647



2415

RONALD O. PERELMAN
36 EAST 63RD STREET
NEW YORK, NY 10021

October 28 19 87

1-231
210 31

PAY TO THE ORDER OF Gephardt for President $ *1,000.00

*One thousand and no/100---------- DOLLARS

The Chase Manhattan Bank, N.A.
726 Madison Avenue at 64th Street
New York, NY 10021

CHASE

MEMO donation NEWY/PC06

Attachment A

8. Dole for President

9304093364 8

.930409336649

RONALD O. PERELMAN
36 EAST 63RD STREET
NEW YORK, NY 10021

17

2466

November 11 19 87

1-2/210 31

PAY TO THE ORDER OF Dole for President $ *500.00

*Five hundred and no/100---------- DOLLARS

The Chase Manhattan Bank, N.A.
726 Madison Avenue at 64th Street
New York, NY 10021

CHASE

MEMO pol. cont. ØLF-G NY

Ronald O. Perelman

100%

Dole for President

P. O. Box 9440
Mineola, New York 11501

930409336550

New York Salute to Senator Robert Dole
Grand Hyatt Hotel, New York
September 16, 1987

Name _____

Address _____

City/State _____ Zip _____

Occupation _____

Name of Business _____

Spouse's Name _____

Telephone Home _____ Business _____

☐ Yes, I will attend the Cocktail Reception on September 16th, honoring Senator Dole. Enclosed is my personal check for one thousand dollars ($1000).

☐ I regret I am unable to attend the Reception, however, enclosed is my contribution.

Please make checks payable to:
DOLE FOR PRESIDENT COMMITTEE
Corporate checks are not permitted by Federal Law

PLEASE RETURN THIS CARD TOGETHER WITH YOUR CONTRIBUTION
NO LATER THAN SEPTEMBER 1st.

Paid for by Dole for President Exploratory Committee

New York Salute to Senator Robert Dole

Dear Friend:

On Wednesday, September 16th, a very special event is being held at the Grand Hyatt in New York City honoring United States Senator Robert Dole. We are writing to cordially invite you to join Secretary of Transportation Elizabeth Dole and other distinguished guests to pay tribute to Senator Dole.

Bob Dole is a man of uncommon integrity who has devoted his life to public service. As a soldier during World War II, local legislator, Congressman, and United States Senator, he has consistently demonstrated his commitment to this great nation. His tenure as majority leader of the United States Senate led to the enactment of historic legislation which turned our economy around and increased our stature in the world community.

Many difficult challenges face this nation, and Bob Dole is the person we need as President leading us in the years ahead. Your contribution of $1000.00 will go to the committee created to promote Senator Dole's campaign for the Presidency.

Please join many of your fellow New Yorkers in supporting this important effort, and plan on being at the Grand Hyatt on September 16th from 5:30 to 7:30 p.m. to meet the next President of the United States.

Sincerely,

Charles A. Gargano
General Co-Chairman

Rand V. Araskog
General Co-Chairman

Stephen M. Ross
General Co-Chairman

Paid for by Dole for President Exploratory Committee

General
Co-Chairman
Charles A. Gargano
Rand V. Araskog
Stephen M. Ross
Reception
Committee
Agro, Mary Cunningham
Agro, William J
Alberca, Sara
Albright, Harry
Alger, Frederick M., III
Ames, John
Andreas, Dwayne O
Araskog, Jessie M
Asaro, Joseph
Axelrod, Michael
Balkany, Rabbi Yehoshua
Berber, Stuart
Berger, Lee
Bernstein, Harold
Bernstein, Martin
Bosh, Ken
Campbell, John
Carter, Donald C.
Carter, Jennifer
Carter, John B
Castle, John
Catalanotto, John
Charatan, Dvirah
Carmichia, Anthony
D'Amato, Armand
Davis, Martin
De Martini, Fred
De Nino, Vincent
Di Marco, Gerry
Doc Gianelli, Honorable Joseph
Donley, James
Dunne, Edward R., Jr.
Dunney, Robert
Edelman, Marty
Ehrlich, Lawrence
Falcone, Michael
Featherstonhaugh, James
Feldman, Irving
Feldner, Gary
Fisher, Richard
Ford, Charlotte
Fraser, Alice
Fried, Michael
Gabra, Francesco
Garofalo, Stephen
Ginsberg, Donald
Glick, Jeffrey
Goldstein, Sheldon
Goldstein, Lynn
Gordon, Edward
Gould, Fred
Graber, Frederic
Hallingby, Paul
Harriman, Richard
Hauser, Rita
Heard, Craig
Heard, Terry
Jeffries, Christopher
Jenkins, Dale
Joseph, Frederick H
Kalikow, Peter
Kapiloff, John
Karsch, Steven
Leader, Leonard
Levin, Neil
Lichtenberg, Jeffrey
Mack, David
Mallea, Robert
Marron, Donald
Marquez, James
Marshall, Alton
Massenger, Hans
Mayer, Edward
Milstein, Howard
Nacierio, Barbara
Nastad, Frank
Nasti, Richard
Pace, Anthony
Pagnano, Charles
Parker, Jack
Pasterenga, Nicholas
Pearce, Henry
Pearlman, Ronald
Peepas, James
Price, Robert
Pusatillo, Michael
Racanelli, Martin
Richer, John
Robertson, Julian
Rosenberg, Robert
Rosenfeld, John
Rudin, Lewis
Schulman, Milton
Schwerin, Warren
Sherman, Fred
Silverstein, Larry
Smith, Peter
Spahn, Constance
Speyer, Jerry
Steinberg, Saul P.
Steinberg, Gaylord
Tisch, James
Trump, Donald
Walsh, Neil
Weiss, Gene
Wyser-Pratte, Guy
Zises, Jay

930409336S1

New York Salute to

Senator Robert Dole

Charles A. Gargano
General Co-Chairman

Rand V. Araskog
General Co-Chairman

Stephen M. Ross
General Co-Chairman

The pleasure of your company is requested
at a cocktail reception in honor of

Senator Robert Dole

on Wednesday, the sixteenth of September
Nineteen hundred and eighty seven

Special Guest
The Honorable Elizabeth H. Dole

Empire State Ballroom
Grand Hyatt Hotel

Five thirty to
Seven thirty

Donation
$1000.00

Dole for President
P.O. Box 9000
Mineola, New York 11501

930409336552

Attachment A

9. Pete Dawkins for Senate

9304093336553

RONALD O. PERELMAN
36 EAST 63RD STREET
NEW YORK, NY 10021

2894

January 26 19 88

1-210 31

PAY TO THE ORDER OF Pete Dawkins for Senate $ *1,500.00

*One thousand five hundred and no/100---------- DOLLARS

The Chase Manhattan Bank, N.A.
726 Madison Avenue at 64th Street
New York, NY 10021

CHASE

MEMO $1,000 - Primary, 500 - General

Ronald O. Perelman

10

930400933654

Attachment A

10. Albert Gore for President

9304093365 5

93040933656

18.

RONALD O. PERELMAN
36 EAST 63RD STREET
NEW YORK, NY 10021

#17

EVAN TO FCNY21

3131

April 7 19 88

1-331
210

PAY TO THE ORDER OF Albert Gore for President $ *1,000.00

*One thousand and no/100---------- DOLLARS

CHASE

The Chase Manhattan Bank, N.A.
726 Madison Avenue at 64th Street
New York, NY 10021

MEMO contribution

000

Dinner Chairpersons

Alan John Blinken
Donald G. Drapkin
Pamela C. Harriman
Benjamin D. Holloway
Jerome R. McDougal
Sandy and Robert W. Pittman
Peter J. Solomon
Maurice Sonnenberg
Howard Squadron
Thomas J. Tisch
Charles Uribe

Dinner Committee

David Aaron
Marife Hernandez and Alan Alpern
Joanne F. and Donald E. Axinn
Roland Betts
Joanne and Richard Bing
Melinda Blinken
The Honorable Jacob Bronner
F. Forrester Church
Barbara and Arnold Cohen
John Connorton
Delores and Alfred DelBello
Robin Chandler Duke and
The Honorable Angier Biddle Duke
John S. Dyson
R. Peter M. Elrick
Arthur D. Emil
Joseph T. English, M.D.
Dasha Epstein
Kenneth K. Fisher
Ambassador and Mrs. Richard Gardner
John G. Heimann
Mildred and Alvin Hellerstein
The Honorable Richard Holbrooke
Bruce Johnson
Katharine Johnson
Richard Kahan
Sarah and Victor Kovner
Ramon A. Lamontagne
James Lindheim
Lawrence A. Mandelker
The Honorable Warren D. Manshel
Win and Anne McCormack
Estelle and Robert Miller
Roger Neece
Martin Peretz
Mike Pietrangelo
Sanford Prater
Kenneth E. Raske
Coates Redmond
Dorothy and Edwin Roer
Lois and Donald Rivkin
Joseph B. Rose
Howard Rosen
Jeffrey Sachs
Robert L. Schiffer
Peter Schoenfeld
Anne Seel
Richard Solomon
Gillian Sorenson
Joanne and Joseph Stein, Jr.
Howard B. Teich
Pauline Trigere
Wallace C. Turbeville
Mary and Alfred Winslow-Jones
Robert Zastrow

9304093657

NEW YORK DESERVES THE BEST!

Join

SENATOR AL GORE

for

Dinner at The Pierre
Tuesday, April 12
Fifth Avenue at 61st Street

Cocktails 7:30
Dinner 8:30

R.S.V.P. (212) 682-4060

9304093365

AL GORE FOR PRESIDENT

New York State Executive Committee

The Honorable Thomas J. Downey, Chairman
The Honorable Alfred B. DelBello, Vice Chairman
Alan John Blinken, Finance Chairman
Lawrence A. Mandelker, Counsel
Aida Alvarez, Co-Chairperson
John Connorton, Co-Chairperson
The Honorable Richard Gardner, Co-Chairperson
Sarah Kovner, Co-Chairperson

☐ I would like to attend the dinner @ $1000 per person Enclosed is my contribution of $ _____ for _____ tickets

☐ I am unable to attend, but am delighted to contribute to the campaign

Enclosed is my personal check for $ _____

Federal Law:
- permits individuals to give $1000 per presidential campaign per candidate ($1000 each from husbands and wives).
- prohibits corporate contributions

Make Checks payable to ALBERT GORE FOR PRESIDENT

Name _____

Residence _____

Town/Zip _____ Telephone _____

Occupation _____ Employer _____

Information required for Federal Election Commission
Authorized and paid for by Gore for President Campaign

5312

930409336559

GORE FOR PRESIDENT
565 FIFTH AVENUE, 6TH FLOOR
NEW YORK, NY 10017

Attachment A

11. Democratic Senatorial Campaign Committee

93040933660

930409336661

Inquiring

RONALD O. PERELMAN
58 EAST 63RD STREET
NEW YORK, NY 10021

3132

April 7 19 88 31-631
213

PAY TO THE ORDER OF Democratic Senatorial Campaign Committee $ *10,000.00

*Ten thousand and no/100---------- DOLLARS

The Chase Manhattan Bank, N.A.
726 Madison Avenue at 64th Street
New York, NY 10021

CHASE

MEMO contribution

Ronald Perelman

100

Attachment A

12. Licht '88 Committee

9304093366 62

930409336663

RONALD O. PERELMAN
38 EAST 63RD STREET
NEW YORK, NY 10021

3207

April 21 19 88

1-231
210

PAY TO THE ORDER OF Licht '88 Committee $ *1,000.00

*One thousand and no/100---------- DOLLARS

The Chase Manhattan Bank, N.A.
720 Madison Avenue at 64th Street
New York, NY 10021

CHASE

MEMO contribution

Ronald O. Perelman

00

Attachment A

13. Riegle for Senate Committee

9304093366 4

OCCUPATION

EMPLOYER

Corporate checks are not permitted by the Federal Election Com

RIEGLE FOR SENATE COMMITTEE
P.O. Box 2434
Washington, D.C. 20013

NAME Mr. Ronald O. Perelman

ADDRESS 36 East 63rd Street
New York NY 10021

PHONE

OCCUPATION

EMPLOYER

Corporate checks are not permitted by the Federal Election Commission

93040933665

RIEGLE FOR SENATE COMMITTEE

I, Ronald O. Perelman, want to support the re-election of Don Riegle to the U.S. Senate.

___ Yes, I can attend your event. My check is enclosed.

__X__ I cannot attend. However, my check is enclosed.

Please complete the Federal Election Commission information requirements on the reverse side of this card and return to:

Riegle for Senate Committee
P.O. Box 3434
Washington, D.C. 20013

Paid for by the Riegle for Senate Committee

930409336666

9304093366667

RONALD O. PERELMAN
36 EAST 63RD STREET
NEW YORK, NY 10021

3191

April 21 19 88

1-231
2103

PAY TO THE ORDER OF Riegle for Senate Committee $ *1,000.00

*One thousand and no/100---------- DOLLARS

The Chase Manhattan Bank, N.A.
726 Madison Avenue at 64th Street
New York, NY 10021

CHASE

MEMO contribution

Ron Perelman

00

Attachment A

14. McCarthy for Senate

9304093366 8

930409336669

RONALD O. PERELMAN
36 EAST 63RD STREET
NEW YORK, NY 10021

3314

May 16 19 88

31-31
216

PAY TO THE ORDER OF McCarthy for U.S. Senate $ *1,000.00

*One thousand and no/100 DOLLARS

The Chase Manhattan Bank, N.A.
726 Madison Avenue at 64th Street
New York, NY 10021

CHASE

MEMO donation

Ron Perelman

00

Attachment A

15. Californians for Pete Wilson

9304093670

930409336711

RONALD O. PERELMAN
38 EAST 63RD STREET
NEW YORK, NY 10021

3411

June 8 19 88

1-231
2131

PAY TO THE ORDER OF Californians for Senator Peter Wilson $ *1,000.00

*One thousand and no/100---------- DOLLARS

The Chase Manhattan Bank, N.A.
726 Madison Avenue at 64th Street
New York, NY 10021

CHASE

MEMO contribution

000

Attachment A

16. The Presidential Trust

9304093672

930409336673

RONALD O. PERELMAN
36 EAST 63RD STREET
NEW YORK, NY 10021

3488

June 24 RR 19

PAY TO THE ORDER OF The Presidential Trust $ *5,000.00

*Five thousand and no/100---------- DOLLARS

The Chase Manhattan Bank, N.A.
720 Madison Avenue at 64th Street
New York, NY 10021

CHASE

MEMO contribution

Attachment A

17. Dukakis for President

93040933674

930409336675

CHAIRMAN EMERITUS

RONALD O. PERELMAN
36 EAST 63RD STREET
NEW YORK, NY 10021

FRONK 3360

June 1 19 88 1-231/210

PAY TO THE ORDER OF Dukakis for President $ *1,000.00

*One thousand and no/100 DOLLARS

The Chase Manhattan Bank, N.A.
726 Madison Avenue at 64th Street
New York, NY 10021

CHASE

MEMO contribution

Susan Strecker

00

Attachment B

FEC Printout of
Ronald O. Perelman's Contributions

93040933676

93040923677

OTHER RELATED ITEMIZED TRANSACTIONS

CONTRIBUTOR/LENDER/TRANSFEROR REPORTING ENTITY MICROFILM LOCATION	STREET ADDRESS TRANSACTION TYPE	CITY	STATE ZIP REPORT TYPE DATE	TYPE OF FILER ELECTION	AMOUNT
PERELMAN, RONALD MOYNIHAN COMMITTEE INC 87SEN/008/3442 #137967	CONTRIBUTION	NEW YORK REVLON	NY 10021 MID-YEAR REPORT 29JAN87	PRIMARY	1,000
PERELMAN, RONALD MOYNIHAN COMMITTEE INC 87SEN/008/3442 #137968	CONTRIBUTION	NEW YORK REVLON	NY 10021 MID-YEAR REPORT 29JAN87	GENERAL	1,000
PERELMAN, RONALD FOR LANTOS FOR CONGRESS COMMITTEE 87HSE/335/1168 #137142	CONTRIBUTION	NEW YORK EXECUTIVE	NY 10021 MID-YEAR REPORT 7APR87	PRIMARY	1,000
PERELMAN, RONALD COMMITTEE FOR SAM GIBBONS 88HSE/339/4006 #271294	CONTRIBUTION	NEW YORK CONSOLIDATED CIGAR	NY 10021 MID-YEAR REPORT 17AUG87	PRIMARY	1,000
PERELMAN, RONALD O METZENBAUM FOR SENATE- 88 87SEN/007/0795 #142969	CONTRIBUTION	NEW YORK	NY 10021 MID-YEAR REPORT 16JUN87	PRIMARY	1,000
PERELMAN, RONALD O COMMITTEE FOR CONGRESSMAN BILL GREEN 87HSE/335/4679 #151180	CONTRIBUTION	NEW YORK MAC ANDREWS & FORBES GROUP	NY 10021 MID-YEAR REPORT 13FEB87	FOR 1986	1,000
PERELMAN, RONALD O COMMITTEE FOR CONGRESSMAN BILL GREEN 87HSE/335/4679 #151181	CONTRIBUTION	NEW YORK MAC ANDREWS & FORBES GROUP	NY 10021 MID-YEAR REPORT 9MAR87	FOR 1986	1,000
PERELMAN, RONALD O BILL BRADLEY FOR U S SENATE '90 87SEN/008/2675 #162332	CONTRIBUTION	NEW YORK REVLON GROUP	NY 10021 MID-YEAR REPORT 13FEB87	PRIMARY	1,000
PERELMAN, RONALD O BILL BRADLEY FOR U S SENATE '90 87SEN/008/2675 #162333	CONTRIBUTION	NEW YORK REVLON GROUP	NY 10021 MID-YEAR REPORT 13FEB87	GENERAL	1,000
PERELMAN, RONALD O PETE DAWKINS FOR SENATE 88SEN/008/1509 #320240	CONTRIBUTION	NEW YORK REVLON GROUP INC	NY 10021 APRIL QUARTERLY 9FEB88	PRIMARY	1,000
PERELMAN, RONALD O PETE DAWKINS FOR SENATE 88SEN/008/1509 #320241	CONTRIBUTION	NEW YORK REVLON GROUP INC	NY 10021 APRIL QUARTERLY 9FEB88	GENERAL	500
PERELMAN, RONALD O DEMOCRATIC SENATORIAL CAMPAIGN COMMITTEE 88SEN/009/2921 #346753	CONTRIBUTION	NEW YORK REVLON GROUP INC	NY 10021 MAY MONTHLY 22APR88	PRIMARY	10,000

FEDERAL ELECTION COMMISSION
UNITED STATES OF AMERICA

NOTICE: THE DOCUMENTS LISTED ABOVE ARE AVAILABLE FOR PUBLIC INSPECTION AND COPYING AT THE FEC. "ANY INFORMATION COPIED FROM SUCH REPORTS OR STATEMENTS MAY NOT BE SOLD OR USED BY ANY PERSON FOR THE PURPOSE OF SOLICITING CONTRIBUTIONS OR FOR COMMERCIAL PURPOSES, OTHER THAN USING THE NAME AND ADDRESS OF ANY POLITICAL COMMITTEE TO SOLICIT CONTRIBUTIONS FROM SUCH COMMITTEE." 2 U.S.C. §438(a)(4)

93040336578

CONTRIBUTOR/LENDER/TRANSFEREE STREET ADDRESS CITY STATE ZIP TYPE OF FILER
REPORTING ENTITY REPORT TYPE ELECTION AMOUNT
MICROFILM LOCATION TRANSACTION TYPE DATE

PERELMAN, RONALD O NEW YORK NY 10021
MCCARTHY FOR U S SENATOR JULY QUARTERLY PRIMARY 1,000
88SEN/011/1948 #427434 CONTRIBUTION MAC ANDREWS & FORBES 23MAY88

PERELMAN, RONALD O NEW YORK NY 10021
LIGHT '88 COMMITTEE JULY QUARTERLY PRIMARY 1,000
88SEN/012/0788 #428039 CONTRIBUTION MACANDREWS & FORBES 29APR88

PERELMAN, RONALD O NEW YORK NY 10021
CITIZENS FOR ARLEN SPECTER MID-YEAR REPORT PRIMARY 1,000
88SEN/013/3244 #462301 CONTRIBUTION MACANDREW & FORBES 16MAY88

PERELMAN, RONALD O NEW YORK NY 10021
DUKAKIS FOR PRESIDENT COMMITTEE COMPLIANCE FUND YEAR-END GENERAL 1,000
88FEC/571/2915 #682458 CONTRIBUTION REVLON INC 8DEC88

PERELMAN, RONALD O NEW YORK NY 10021
DUKAKIS FOR PRESIDENT COMMITTEE COMPLIANCE FUND COMP ADJUST AMEND GENERAL 1,000
90FEC/634/2988 #704801 CONTRIBUTION REVLON INC 8DEC88

PERELMAN, RONALD O NEW YORK NY 10021
DUKAKIS FOR PRESIDENT COMMITTEE, INC COMP ADJUST AMEND PRIMARY 1,000
90FEC/634/2776 #705008 CONTRIBUTION REVLON INC 8DEC88

PERELMAN, RONALD O MR NEW YORK NY 10021
BIDEN FOR PRESIDENT JULY QUARTERLY PRIMARY 1,000
87FEC/476/0736 #044844 CONTRIBUTION MCANDREWS & FORBES GROUP INC 25JUN87

PERELMAN, RONALD O MR NEW YORK NY 10021
FRIENDS OF GARY HART-1988 INC JULY QUARTERLY PRIMARY 1,000
87FEC/476/0317 #039253 CONTRIBUTION 6MAY87

PERELMAN, RONALD O MR NEW YORK NY 10021
GEORGE BUSH FOR PRESIDENT, INC YEAR-END PRIMARY 500
88FEC/506/1507 #186111 CONTRIBUTION 27OCT87

PERELMAN, RONALD O MR NEW YORK NY 10021
GEPHARDT FOR PRESIDENT COMMITTEE INC YEAR-END PRIMARY 1,000
88FEC/506/2336 #189431 CONTRIBUTION 2NOV87

PERELMAN, RONALD O MR NEW YORK NY 10021
DOLE FOR PRESIDENT COMMITTEE INC YEAR-END PRIMARY 500
88FEC/499/0877 #194634 CONTRIBUTION 20NOV87

PERELMAN, RONALD O MR NEW YORK NY 10021
ALBERT GORE JR FOR PRESIDENT COMMITTEE INC MAY MONTHLY PRIMARY 1,000
88FEC/527/1765 #544243 CONTRIBUTION 22APR88

NOTICE: THE DOCUMENTS LISTED ABOVE ARE AVAILABLE FOR PUBLIC INSPECTION AND COPYING AT THE FEC. "ANY INFORMATION COPIED FROM SUCH REPORTS OR STATEMENTS MAY NOT BE SOLD OR USED BY ANY PERSON FOR THE PURPOSE OF SOLICITING CONTRIBUTIONS OR FOR COMMERCIAL PURPOSES, OTHER THAN USING THE NAME AND ADDRESS OF ANY POLITICAL COMMITTEE TO SOLICIT CONTRIBUTIONS FROM SUCH COMMITTEE." 2 U.S.C. §438(a)(4).

CONTRIBUTOR/LENDER/TRANSFERER / REPORTING ENTITY / MICROFILM LOCATION / TRANSACTION TYPE	STREET ADDRESS	CITY	STATE ZIP	TYPE OF FILER / REPORT TYPE / DATE	ELECTION	AMOUNT
PERELMAN, RONALD O MR REPUBLICAN NATIONAL COMMITTEE - CONTRIBUTIONS (AKA REPUBLICAN NATIONAL FINANCE COMMITTEE 88FEC/534/4042 #402800 CONTRIBUTION		NEW YORK CITY MACANDREWS & FORBES	NY 10153	JULY QUARTERLY 30JUN88	PRIMARY	5,000
PERELMAN, RONALD O MR CALIFORNIANS FOR PETE WILSON 1994 88SEN/011/1157 #417463 CONTRIBUTION		NEW YORK REVLON INC	NY 10021	JULY QUARTERLY 27JUN88	GENERAL	1,000
PERELMAN, RONALD O MR RIEGLE FOR SENATE IN '88 COMMITTEE 88SEN/012/3285 #420685 CONTRIBUTION		NEW YORK [illegible]	NY 10021	JULY QUARTERLY 9MAY88	PRIMARY	1,000

NOTICE: THE DOCUMENTS LISTED ABOVE ARE AVAILABLE FOR PUBLIC INSPECTION AND COPYING AT THE FEC. "ANY INFORMATION COPIED FROM SUCH REPORTS OR STATEMENTS MAY NOT BE SOLD OR USED BY ANY PERSON FOR THE PURPOSE OF SOLICITING CONTRIBUTIONS OR FOR COMMERCIAL PURPOSES, OTHER THAN USING THE NAME AND ADDRESS OF ANY POLITICAL COMMITTEE TO SOLICIT CONTRIBUTIONS FROM SUCH COMMITTEE." 2 U.S.C. [illegible]

Attachment C

Affidavit of Richard E. Halperin

9304093380

BEFORE THE FEDERAL ELECTION COMMISSION

STATE OF NEW YORK)
: ss.: MUR 3104
COUNTY OF NEW YORK)

AFFIDAVIT OF RICHARD E. HALPERIN

Richard E. Halperin, being duly sworn, deposes and says, that

1. I am Senior Vice President of MacAndrews & Forbes Group Incorporated, and Special Counsel to Ronald O. Perelman, Chairman of MacAndrews & Forbes Group Incorporated. I have been in this position since February 1984. From September 1979 to January 1984, I served as Administrative Assistant to the Attorney General of New York State and as an Assistant Attorney General in the Executive Bureau.

2. As Senior Vice President and Special Counsel to the Chairman of MacAndrews & Forbes Group Incorporated, I have broad responsibilities involving the interests of Mr. Perelman, individually, MacAndrews and Forbes Group Incorporated, and its subsidiaries. For example, I chair charitable foundations funded by Mr. Perelman and the corporations, I am responsible for the real estate holdings of Mr. Perelman and the corporations, and although a small part of my overall duties, I am solely

9304093368 1

responsible for responding to solicitations for political contributions addressed to Ronald O. Perelman, individually, MacAndrews & Forbes Group Incorporated, and its subsidiaries. It is my responsibility to decide whether to contribute, how much to contribute, and from what source, i.e., Ronald Perelman's personal funds or corporate funds.

3. Every Spring, beginning in 1986, I have authorized contributions, on behalf of Ronald O. Perelman, to the Republican National Committee ("RNC") Presidential Dinner. In the Spring of 1988, however, a contribution I thought was the annual contribution to the RNC Presidential dinner was, in fact, a contribution to the Presidential Trust, which was featured as a dinner with then Vice-President and Mrs. George Bush.

4. Prior to 1988, contributions made to the Presidential Dinner were made either to the RNC's Building Fund or an account that accepted other than federal funds. In fact, upon review of our records, I authorized the 1986 and 1987 contributions to the Presidential Dinner, on Mr. Perelman's behalf, from corporate funds. The RNC apparently deposited those contributions in accounts that permitted the use of corporate funds.

9304093336882

5. In 1988, the solicitation for the Presidential Trust requested that the contribution be made from individual funds, not corporate funds. That did not indicate to me that the contribution would count against Mr. Perelman's annual federal contribution limit because I had recalled receiving a Democratic National Committee ("DNC") solicitation that requested individual funds even though the contribution was for a non-federal account. As was the case with the DNC, I believed that the RNC was requesting non-federal contributions from non-corporate sources in the presidential election year.

Richard E. Halperin

Sworn to and Subscribed before me
this 25th day of September, 1990.

KAREN A. DeMECO
Notary Public, State of New York
No. 41-4696582
Qualified in Queens County
Commission Expires March 30, 19 91

9304093336883

Attachment D

Refund Check

9304093336834

9304093368 5

REPUBLICAN NATIONAL FINANCE COMMITTEE
310 FIRST STREET, SE.
WASHINGTON, D.C. 20003

2494

April 30 19 90

PAY TO THE ORDER OF RONALD PERELMAN $ 5,000.00***

FIVE THOUSAND AND 00/100

DOLLARS

Bank of Virginia
1756 South Jefferson Davis Highway
Arlington, Virginia 22202

FOR 1988 REFUND

Pat Hoyt

⑈0000 2494⑈ ⑆056004089⑆ 651⑈722064 3⑈

Attachment E

Congressional Quarterly Report
On Senator Biden's Withdrawal
From The Presidential Race

9304093336886

Second Presidential Dropout:

Character Issue Strikes Again, Forcing Biden to Halt His Bid

When measuring how presidential candidates are faring in the long period before the first public vote in Iowa, it has been customary to look at public opinion polls, big-name endorsements and fund-raising success. But the stunning collapse of the second Democratic candidacy this year — that of Sen. Joseph R. Biden Jr. — makes it clear that the more nebulous area of personal character has emerged as a key bench mark in measuring candidates.

Former Democratic Sen. Gary Hart's campaign quickly unraveled in May when he failed to answer satisfactorily questions about sexual impropriety. Biden was unable to withstand charges of plagiarism that surfaced in mid-September, just as he opened the Senate Judiciary Committee hearings on President Reagan's Supreme Court nominee Robert H. Bork. Biden withdrew from the race in a statement delivered on Capitol Hill Sept. 23.

Sen. Joseph R. Biden Jr.

No Bedrock

In the traditional measurements of early campaign progress, Hart and Biden had both done reasonably well. When his candidacy collapsed in May, Hart was running atop the Democratic field; he had high name recognition in the polls and was in the process of building a large national organization. *(Background, Weekly Report p. 923)*

When he folded his campaign, Biden had raised more money (nearly $3.3 million by the end of the last reporting period in June) and had more cash on hand ($1.8 million) than any other Democrat except Massachusetts Gov. Michael S. Dukakis. After a slow start, Biden was also showing progress in recent polls in Iowa.

But neither Biden nor Hart felt he could keep his campaign afloat in the face of serious questions about his personal ethics.

Candidates with a large and loyal personal following might not have been forced to close up shop. If, for instance, similar questions regarding personal character were raised against the Rev. Jesse L. Jackson or the Rev. Pat Robertson, both probably would have been able to rally substantial support, since they have constituencies that are passionately loyal not only to them, but also to a cause.

Biden and Hart were perceived as less cause-oriented candidates; when the ground started slipping under them, they had no bedrock of support on which to stand.

A Political Joe Isuzu

As the Bork hearings opened, Biden was buffeted by charges of plagiarism that ranged from a law school paper in 1965 to some of his recent presidential campaign speeches. At a Capitol Hill news conference Sept. 17, he sought to defuse the controversy. He admitted that he had plagiarized a law review article while a student at the Syracuse University Law School and had mistakenly quoted some modern-day political figures without attribution in some of his presidential campaign speeches. But Biden emphasized that he was in the race to stay. *(Background, Weekly Report p. 2256)*

That public resolve lasted for only six days. When confronted by a new report that he had embellished his academic record when speaking at a coffee klatch in New Hampshire earlier this year, he was forced to admit more inaccuracies.

With this added to his earlier admissions, Biden appeared in danger of being widely viewed as a political version of Joe Isuzu, the grinning character in a current TV advertisement whose outrageous exaggerations about his product are accompanied by subtitles that set the record straight.

Biden campaign officials emphasized that Biden's misstatements covered no more than 15 minutes of a career that spanned 15 years in national politics, but the candidate admitted that "the exaggerated shadow of those mistakes has begun to obscure the essence of my candidacy and the essence of Joe Biden."

In his Sept. 23 withdrawal statement, the 44-year-old Biden outlined two basic choices — to concentrate on rebuilding his image in an effort to get his presidential campaign back on track; or to focus his attention on the Bork hearings, where he faces the demanding task of chairing the proceedings in a fair way while at the same time opposing Bork's nomination. "There will be other opportunities for me to campaign for president," he concluded, "but there will not be many other opportunities for me to influence President Reagan's choice on the Supreme Court."

Plenty More Hats

While Biden was taking his hat out of the ring, several other candidates were preparing to throw theirs in. Robertson will formally launch his bid for the Republican nomination Oct. 1. He is to be followed into the GOP race by Vice President George Bush, who has scheduled his formal announcement for Oct. 12.

Jackson is to enter the Democratic race officially on Oct. 10. Meanwhile, Rep. Patricia Schroeder of Colorado has indicated she will announce Sept. 28 whether she also is running for the Democratic nomination. ■

—By Rhodes Cook

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9304093368 7

Attachment F

Sample Reports Analysis
Division Internal Referral Sheet

9304093336888

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Attachment 2

NOVEMBER 23, 1979

MEMORANDUM

TO: OFFICE OF GENERAL COUNSEL

ATTENTION: LESTER SCALL

THROUGH: ORLANDO B. POTTER O.B.P. for O.B.P.

FROM: THOMAS J. HASELHORST

SUBJECT: INDIVIDUALS EXCEEDING $25,000 YEARLY LIMIT.

Attached are MUR updates to seven of nine RAD referrals concerning individuals who exceeded the $25,000 yearly limits. These updates contain contributions made in 1977 and 1979 to candidates or candidate committees which may be attributed to the 1978 limitations.

In the case of an individual residing in a community property state the pages of the G Index showing all contributions from the contributor and his/her spouse have been attached.

All contributions from an individual which aggregate in excess of $1,000 to a Federal candidate have been reviewed for election designation. Unless otherwise noted, no contributions aggregating in excess of $1,000 were designated to a particular election.

9304093336889

REPORTS ANALYSIS REFERRAL UPDATE

*ORIGIN: RAD

DATE 11-23-79

ANALYST Mary Luppi

TO: Office of General Counsel
ATTENTION: Lester Scall

TEAM CHIEF Peggy Sims

COMPLIANCE REVIEW Carroll Bowen

THROUGH: STAFF DIRECTOR

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS

MUR No. 1059

DATE OF ORIGINAL REFERRAL 10/22/79

**PURPOSE: INFORMATION

Contributions made by H. E. Chiles during the 1977 and 1979 calendar years but designated for the 1978 primary and general elections.

1977 itemized contributions (by committee).	Att. #1
1979 itemized contributions (by committee).	Att. #1
Supporting schedules for 1977 contributions.	Att. #2
Supporting schedules for 1979 contributions.	Att. #3
G Index-Section 1, 1977-78.	Att. #4
G Index- Section 1, 1979.	Att. #5
Independent Expenditure made against Jim Wright (TX/12).	Att. #6

OUTCOME: (if applicable)

*Commission unit which initiated original Referral (e.g. AUDIT/RAD/OGC).
**INFORMATION, or RESULTS OF RAD ACTION, as appropriate.

9304093336900

RESULTS OF REVIEW

Contributions made in 1977:	
Helms for Senate Committee	$250
Re-Elect Senator Baker Committee	1,250 *
Friends of George Roche	250
Friends of Jim Collins	250
Friends of Gillis Long	500
Berman for Congress - 78	1,000
Contributions made in 1979:	
Friends of Roger Jepsen	500
Bell for Senate Committee	1,000
Swigert Senate Committee	300
Gramm for Congress	1,000
Gearhart for Congress	1,000
Wes Mowery for Congress	1,000
1977 AND 1979 CONTRIBUTIONS TO CANDIDATES AND PCCS DESIGNATED FOR THE 1978 ELECTIONS. TOTAL:	8.300
TOTAL CONTRIBUTIONS FOR 1978 AS PREVIOUSLY LISTED ON RAD REFERRAL #9L-174:	26,250
TOTAL CONTRIBUTIONS BY H. E. CHILES FOR THE 1978 ELECTIONS:	34,550
Addition of 1977 contribution Phil Gramm for Congress Committee	1,000
	$35,550

* An RFAI will be sent for election designation to the Re-Elect Senator Baker Committee concerning the $1,250 contributed by H. E. Chiles.

9304092336911

Attachment G

The Moynihan Committee's
1988 Solicitation Material

9304093369 2

9 3 0 4 0 9 3 3 6 9 3

930409336 94

Monday

May 23, 1988

Daniel Patrick Moynihan

New York's Senior Senator

will announce

his candidacy

for a

third term

in the

United States Senate

PLEASE COME!

CHEER, WAVE BANNERS, SING

AND CELEBRATE!

at the

ANNOUNCEMENT PARTY

and

FUN-RAISING RALLY

IN SUPPORT OF PAT'S RE-ELECTION

5:30 - 7:30 PM

Empire State Ballroom

Grand Hyatt Hotel

42nd Street and Park Avenue

New York City

Contribution card enclosed

OGC 8231

LAW OFFICES
WUNDER, RYAN, CANNON & THELEN
1615 L STREET, N.W., SUITE 650
WASHINGTON, D. C. 20036
(202) 659-3005
FACSIMILE: (202) 659-3010

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

90 OCT 15 AM 11:51

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 OCT 16 PM 3:39

October 9, 1990

Lawrence M. Noble, Esq.
General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

RE: MUR ~~3026~~ 3104

Attn: Francis Hagen

Dear Ms. Hagen:

In the response I filed on September 21, 1990 in the above referenced matter, I reference Mr. Kravis was expecting a reimbursement check from Californians for Senator Wilson.

Please find enclosed, a copy of the check which has recently been received on behalf of Mr. Kravis pursuant to the previous notification of the Wilson Committee.

Thank you for your time and attention to this matter.

Very truly yours,

Paul E. Sullivan

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CALIFORNIANS FOR SENATOR PETE W...
San Diego, California 92101

001690

RETURN OF CONTRIBUTION

CALIFORNIANS FOR SENATOR PETE WILSON
1629 COLUMBIA STREET
SAN DIEGO, CALIFORNIA 92101
(619) 235-6531

GROSSMONT BANK
Downtown San Diego Office
San Diego, CA

90-3210
1222

001690
Check No.

ONE THOUSAND & 00/100

DATE
10-02-90

AMOUNT
$1,000.00

PAY TO THE ORDER OF
HENRY KRAVIS

930403336996

⑈001690⑈ ⑆122232109⑆ 07⑈004591⑈01

Common Cause

2030 M STREET, NW • WASHINGTON, D.C. 20036 • PHONE: (202) 833-1200 • FAX: (202) 659-3716

ARCHIBALD COX
Chairman

FRED WERTHEIMER
President

JOHN W. GARDNER
Founding Chairman

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
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RECEIVED
FEDERAL ELECTION COMMISSION
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November 1, 1990

Lee Ann Elliott
Chairman
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

MUR 3161

Dear Ms. Elliott:

I am enclosing for your information a complaint filed with the Commission today alleging that certain respondents violated the aggregate contribution limit of the FECA by making contributions in excess of $25,000 for 1988. Based on publicly available information, it appears that the FEC has taken no action against these individuals.

Regardless of whether the Commission is taking or has taken action against these specific individuals, it appears that the Commission has no adequate system to detect routinely such violations. We strongly urge the Commission, to the extent it has not already done so, to take appropriate action against these individuals and to institute procedures by which the FEC can regularly detect such violations.

The Commission maintains records from which it could detect violations of and enforce the aggregate limit of the FECA. The exhibits to the attached complaint, which list contributions by the name of the contributor, were generated from data maintained by the Commission. There is no reason why the Commission cannot and should not have an effective procedure by which such records are regularly monitored for violations of the aggregate limit.

We urge the Commission to take appropriate action against the individuals named in the attached complaint and to establish effective procedures by which the Commission regularly monitors the aggregate contributions of individuals for violations of the FECA.

Sincerely,

Fred Wertheimer
President

Enclosure

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FEDERAL ELECTION COMMISSION
ADMINISTRATIVE DIVISION

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BEFORE THE
FEDERAL ELECTION COMMISSION

MUR3161

COMMON CAUSE
2030 M Street, N.W.
Washington, D.C. 20036
(202) 833-1200,

Complainant,

v.

DWAYNE O. ANDREAS, DOROTHY INEZ ANDREAS,
HENRY KRAVIS, RAYMOND KRAVIS,
RONALD O. PERELMAN, IRA RIKLIS,
HAROLD SIMMONS,

Respondents.

COMPLAINT

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FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

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COMPLAINT OF COMMON CAUSE

1. This complaint charges that respondents have violated the Federal Election Campaign Act, 2 U.S.C. § 431 et seq., as amended ("FECA"), by making aggregate contributions in excess of the limits provided by the FECA.

PARTIES

2. Complainant Common Cause is a nonprofit membership corporation organized under the laws of the District of Columbia. It has approximately 280,000 dues-paying members in the 50 states and the District of Columbia. Common Cause promotes, on a non-partisan basis, its members' interest in open, honest and effective government and political representation. Common Cause seeks to achieve this objective by making government more

responsive to the needs and demands of citizens through government and election reform.

3. Respondents are individual contributors to various political committees.

APPLICABLE STATUTES AND REGULATIONS

4. The FECA limits aggregate contributions by any individual to $25,000 per calendar year. Contributions to a candidate made in a year other than the calendar year of the election with respect to which the contribution is made are considered to be made during the calendar year in which such election is held. 2 U.S.C. § 441a(a)(3); accord 11 C.F.R. § 110.5.

GROUNDS FOR COMPLAINT

6. On information and belief, respondent Harold Simmons made contributions attributed to the 1988 calendar year in the amount of $59,958. (See Attachments 1 and 2). These contributions exceed the $25,000 limit imposed by the FECA by $34,958.

7. On information and belief, respondent Henry Kravis made contributions attributed to the 1988 calendar year in the amount of $56,711. (See Attachments 1 and 3). These

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contributions exceed the $25,000 limit imposed by the FECA by $31,711.

8. On information and belief, respondent Raymond Kravis made contributions attributed to the 1988 calendar year in the amount of $34,500. (See Attachments 1 and 4). These contributions exceed the $25,000 limit imposed by the FECA by $9,500.

9. On information and belief, respondent Ronald O. Perelman made contributions attributed to the 1988 calendar year in the amount of $30,500. (See Attachments 1 and 5). These contributions exceed the $25,000 limit imposed by the FECA by $5,500.

10. On information and belief, respondent Ira Riklis made contributions attributed to the 1988 calendar year in the amount of $29,500. (See Attachments 1 and 6). These contributions exceed the $25,000 limit imposed by the FECA by $4,500.

11. On information and belief, respondent Dwayne O. Andreas made contributions attributed to the 1988 calendar year in the amount of $28,680. (See Attachments 1 and 7). These contributions exceed the $25,000 aggregate limit imposed by the FECA by $3,680.

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12. On information and belief, respondent Dorothy Inez Andreas made contributions attributed to the 1988 calendar year in the amount of $27,680. (See Attachments 1 and 8). These contributions exceed the $25,000 aggregate limit imposed by the FECA by $2,680.

13. Under the FECA, individuals are not permitted to make contributions aggregating more than $25,000 in any calendar year. On information and belief, each respondent has exceeded this aggregate limit.

RELIEF

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

Respectfully submitted,

Fred Wertheimer

Fred M. Wertheimer

COMMON CAUSE
2030 M Street, N.W.
Washington, D.C. 20036
(202) 833-1200

Dated: November 1, 1990

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VERIFICATION

The undersigned complainant, on behalf of 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 his information and belief.

Fred M. Wertheimer

District of Columbia)
) ss

Subscribed and sworn to before
me this 1st day of November, 1990

Notary Public

My Commission Expires: My commission expires June 30, 1992

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Attachment 1

Los Angeles Tim[redacted] 4/18/90

COLUMN ONE

Campaign Gifts Flow From Rich

■ Donations to candidates are once again unrestrained and virtually unenforced. Some of the heaviest spenders are over their legal limit.

By SARA FRITZ
and DWIGHT MORRIS
TIMES STAFF WRITERS

WASHINGTON—Over the past three years, as Congress debated legislation to limit hostile business takeovers, Texas corporate takeover specialist Harold C. Simmons and his family pumped more than $250,000 into the campaign coffers of key federal office-seekers. In the process, Simmons' contributions more than doubled the legal limit on political giving by the very rich.

Simmons made more than $120,000 in personal contributions to President Bush and members of Congress who were in a position to influence legislation governing corporate takeovers.

He gave $59,958 just to candidates seeking election in 1988, more than double the $25,000 limit. His relatives, after consulting with Simmons, gave to a similar list of candidates for public office after consulting with Simmons.

At the same time, Simmons proved an effective force in Congress. Campaign contributions and tireless lobbying by Simmons and others of the nation's biggest corporate raiders, according to congressional sources, have played a big role in blocking legislation that would have severely restricted leveraged buyouts and other hostile takeovers.

While Simmons is a leader among wealthy patrons of the American political system, he is certainly not the only millionaire who exceeded civil limits established by a Watergate-era law designed to prevent the rich from exerting undue influence on the political system.

A Times study, which used computer searches of federal election reports to focus on the political giving habits of more than 100 of the nation's wealthiest and most influential citizens, found that at least nine others also exceeded the legal limit during the 1988 election campaign.

The nine others were corporate buyout specialists Ronald O. Perelman, Meshulam Riklis and Henry Kravis; Kravis' brother, Raymond; Riklis' son, Ira; Manhattan developer Donald Trump; grain trader Dwayne O. Andreas, and his wife, Dorothy Inez, and Caroline Rose Hunt, daughter of the late Texas oilman H.L. Hunt.

Kravis, like Simmons, exceeded the limit by more than 100%, according to federal records.

When contacted by The Times, spokesmen for each of these rich contributors acknowledged the accuracy of the records.

"I can't make the problem go away," said John Garrett, Simmons' lawyer, after reviewing his client's canceled checks and contribution records.

Spokesmen for most of the other nine donors asserted that their violations were inadvertent. A few pointed out that they had exceeded the limit only by a few hundred or a few thousand dollars.

These heavy contributors are the sorts of people who have important business and financial interests affected by decisions made in Washington by officials they help to elect. So enormous have such contributions become that many of the congressional recipients of the largess are beginning to worry about the consequences and to agitate for reform.

"There is too much money in politics; there is too much special-interest influence," declared Sen. David L. Boren (D-Okla.), who himself has received thousands of dollars from these contributors and is leading the drive for reform. "It's an open invitation to corruption."

Ironically, the records suggest, wealthy individuals are giving even more money to presidential and congressional candidates than they did two decades ago when Congress enacted a law intended to restrain political contributions by the very rich.

Example of Donations

The Bass family of Ft. Worth, for example, distributed close to $700,000 to a variety of candidates for federal office over the past three years—most of them defenders of Texas oil interests. Many others doled out contributions of as much as $100,000 to a single presidential candidate.

The Times review of federal and state campaign records shows that political giving by the rich is now largely unrestrained.

Even many of those who technically abide by the $25,000 limit seem to have found other ways to channel additional money to candidates. Some have relatives who contribute to a similar collection of candidates. Some make so-called "soft money"—contributions to presidential and congressional candidates that are not limited by law because they are forwarded to state political parties for party-building activities.

Among the givers who used one or both of those entirely legal techniques for giving more than $25,000 were the Bass family; Hollywood executive Lew R. Wasserman; Disney executives Michael D. Eisner, Frank G. Wells and Jeffrey Katzenberg; Chicago industrialist Lester Crown, and several descendants of the late Texas oilman, H.L. Hunt.

Although Wasserman and the Bass family have been fined in the past by the Federal Election Commission for their unrestrained giving to political candidates, FEC officials acknowledge that they do not adequately monitor compliance with the limits on individual donations. A search through federal records shows no penalties exceeding $250.

Fred Wertheimer, president of Common Cause, the self-styled citizens' lobby, said the information uncovered by The Times' study of campaign giving "means that the laws on the books intended to prevent wealthy contributors from using large amounts of money to potentially influence government are being ignored."

The FEC's failure to enforce the laws governing donations by individual contributors demonstrates the need for a massive overhaul of federal election laws, which is currently being considered in Congress, according to Wertheimer. He said the FEC does not monitor compliance with the $25,000 limit, and also has failed to write regulations that would restrict soft-money contributions.

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"If we had effective enforcement of the law today, the soft-money contributions would not be taking place and contributions over the aggregate limit would not be occurring," he said. "Since the FEC is not doing its job, Congress must again act to make sure the law means what it says."

Nixon Contributions

The current law, enacted in 1974, was intended to prevent the kinds of activities that occurred during the 1972 presidential campaign of Richard M. Nixon. According to public records, Nixon's aides collected contributions of $1 million or more from such rich industrialists as W. Clement Stone of Chicago, Max N. Fisher of Detroit and Richard M. Scaife of Pittsburgh, Pa. At the time, those contributions were legal.

Under the law, contributors are permited to give up to $2,000 to a congressional campaign, $5,000 a year to a political action committee and $20,000 a year to a party committee. Total contributions for a single year (donations in 1989 to a candidate running in 1990 count toward the 1990 limit) may not exceed $25,000.

Although the FEC has "no legal authority to fine anyone," according to FEC spokesman Scott Moxley, it can try to negotiate civil fines of up to $5,000 for unwitting violations and $10,000 for willful violations, but federal records showed no penalties approaching more than a fraction of those limits.

In violations deemed to be "substantial and willful," Moxley said, the FEC could refer cases to the Justice Department for criminal prosecution, and the penalties could range up to $25,000 and one year in jail.

In the 16 years since the law was passed, however, party leaders, candidates and their rich contributors have found numerous ways to circumvent those restrictions. The result is a system in which, as Wertheimer put it, "Watergate-size and Watergate-style campaign money are once again a major force in federal elections."

Anita Dunn, communications director for the Democratic Senatorial Campaign Committee, said some contributors may actually be unaware of the $25,000 limit because the candidates, PACs and parties are not bound by law to remind them about it. "There's no rule that you have to inform people what the federal aggregate limit is," she said.

The giving habits of Simmons, Kravis and Perelman vividly illustrate how some very rich people coffers of influential candidates—especially when their business interests appear to be threatened by government action.

These three men had a great deal at stake in 1988 and 1989, when Congress considered legislation that would have made it easier for corporate managers to fend off hostile takeovers. George Bush, first as a candidate and then as President, hinted that he might support legislation to toughen the tax treatment of corporate debt, which is a vital component of most hostile takeovers.

But both Bush and Congress eventually backed down.

Some members of Congress insist that individual contributions are so small when measured against their total fund-raising needs that they have little influence. "I really do not believe that senators are going to be bought for a $1,000 contribution or for a $5,000 contribution," said Sen. John C. Danforth (R-Mo.).

But economist Robert Reich of Harvard, among others who closely observed the process, says campaign contributions from corporate raiders were directly responsible for dissuading Congress and the President from taking any action against corporate takeovers.

"Wall Street has been pouring money onto Capitol Hill and both Democrats and Republicans have developed a strong thirst for it," he said. "All of this is manifest in Wall Street's extraordinary power and the resolute timidity of Congress in the face of that power."

Over the past three years, the Simmons, Kravis and Perelman families each made more than $250,000 in political contributions, most of them to Bush and members of Congress who were in a position to play a key role in killing any corporate takeover legislation.

In the House, Simmons gave contributions of between $500 and $1,000 to the men with the most control over such legislation: John D. Dingell (D-Mich.), chairman of the Energy and Commerce Committee; Edward J. Markey (D-Mass.), chairman of the subcommittee with direct responsibility for financial markets, and three other members of the committee—Mike Synar (D-Okla.), John Bryant (D-Tex.) and Joe L. Barton (R-Tex.).

While Markey's subcommittee held extensive hearings on the corporate buyout issue during 1989, it did not draft legislation.

In the Senate, Simmons and Kravis gave contributions of $1,000 to $2,000 to many members of the Banking and Finance Committees, which have jurisdiction over corporate finance. Finance Chairman Lloyd Bentsen (D-Tex.) received $5,000 from the Simmons family and $2,000 from Kravis for his 1988 reelection campaign. After publicly criticizing the takeovers, Bentsen announced in March, 1989, that his panel could propose no legislation.

The year before, the Banking Committee sent to the Senate floor a bill designed to curb corporate takeovers. But Sen. William Proxmire (D-Wis.), then the committee's chairman, abruptly pulled the bill from the floor after the Senate voted 57 to 40 in favor of an amendment that would have curbed the use of so-called "poison pills" by managers to avert outside takeovers.

That pro-takeover amendment effectively killed the bill, and 21 of the 26 senators who had received campaign contributions from Simmons, Kravis or Perelman over the past three years voted in favor of it. Only five—John Heinz (R-Pa.), Albert Gore Jr. (D-Tenn.), Donald W. Riegel Jr. (D-Mich.), Daniel Patrick Moynihan (D-N.Y.) and Paul Simon (D-Ill.)—voted to protect poison pills.

While contributing these large sums of money, Kravis, by his own account, also privately lobbied about 50 members of the House Ways and Means and Senate Finance Committees, arguing that corporate takeovers generally are good for the nation's competitiveness. One House member who met with him twice recalled that Kravis was "very persuasive."

Unlike Kravis, Simmons seldom if ever does any personal lobbying in Washington. Despite his wealth and phenomenal success, he remains a shy, unassuming personality.

A poor boy from rural Texas, Simmons, now 58, began his business career with an investment of $5,000 and built a successful drug store chain that he sold to the Eckard drug store chain. Then, through a series of corporate takeovers, he amassed a financial empire currently valued at nearly $2 billion. He recently lost a battle for control of Lockheed Corp.

Although FEC records show that Simmons contributed more than twice the $25,000 limit to candidates in 1988, his lawyers assert that $7,000 of those contributions were actually intended to be donated by his wife, Annette, but she did not sign the check.

'Laws on the books intended to prevent wealthy contributors from using large amounts of money to potentially influence government are being ignored.'

— FRED WERTHEIMER
Common Cause president

The lawyers acknowledged that the FEC records are otherwise accurate. And even by their own accounting, Simmons was $27,958 over the annual limit for political giving set by federal law.

A lawyer representing Simmons said the couple wrongly believed they would not run afoul of the law if they kept their combined donations under $50,000. "That may not be the law, but that's the way he does it," Simmons' lawyer said. He did not explain how Simmons and his wife failed to abide by their self-imposed $50,000 ceiling.

In addition to Simmons' $59,958 in contributions, federal records show that his wife contributed $10,750, his two brothers and sister-in-law gave $15,175 and his four daughters—three of them still college students—kicked in another $51,500. That brought the family's total contribution to more than $137,000.

Like most rich families that make substantial political contributions, all members of the Simmons clan gave money to a similar list of candidates. Critics of the current system view this pattern as evidence that individuals such as Simmons are actually responsible for all the donations. Indeed, according to party officials, the candidates who receive the money assume it is all coming from one source.

The parallel contributions of Simmons and his family members are particularly clear in the case of his three college-student daughters. In 1987, for example, Scheryle Simmons gave $5,000 to the PAC of one of her father's corporations, Contran, and another $5,000 to the PAC of the Chicago-based law firm that does business for her father, Kirkland Ellis. Simmons' lawyer acknowledged that Simmons and his wife and daughters discussed their contributions before making them.

While Simmons shuns lobbying, Kravis and Perelman are well known in political circles, and both clearly enjoy rubbing elbows with Washington's power elite. Perelman's national reputation soared in 1986 when he acquired Revlon for $3 billion, and Kravis is best known for the biggest takeover in history, the $25-billion leveraged buyout of RJR Nabisco Inc. in 1988.

Records show that Kravis, 45, contributed $56,711 directly to federal candidates and political action committees in 1988, or more than twice the legal limit. His brother, Raymond, an internationally recognized oil and gas consultant, exceeded it by giving $34,500. His wife, fashion designer Carolyne Roehm, contributed another $3,711. Like the Simmons family, the different members of the Kravis clan gave mostly to the same candidates.

A spokesman for Kravis declined to comment on the FEC records of his contributions.

Kravis also made a so-called "soft money" contribution of $100,000 to Team 100, a program run out of Republican National Committee headquarters in 1988 by Bush's chief fund-raiser, Robert A. Mosbacher, now secretary of commerce.

Although the money was raised by Bush's presidential campaign, it was not subject to federal limitations because it technically was spent on the state level by the Republican Party for such things as voter registration and get-out-the-vote drives.

It is estimated that Bush and his Democratic opponent, Michael S. Dukakis, used this loophole in federal election laws to raise about $50 million between them in soft money in 1988. The money is used to supplement the $92.2 million in public funds received by presidential candidates.

While Simmons and Kravis favored Republican candidates, Perelman, 46, whose personal wealth is estimated at $2.75 billion, showed little or no party favoritism in his giving during the last election campaign. His soft-money contributions were evenhanded—$100,000 to the Republicans' Team 100 and $100,000 to a similar fund created by Democratic fund-raiser Robert Farmer for Dukakis.

According to FEC records, Perelman also gave a total of $30,500 in contributions that were subject to federal law, or more than $5,000 over the legal limit. These included $1,000 each to Democratic presidential hopefuls Dukakis, Joseph R. Biden Jr., Gary Hart, Richard A. Gephardt and Gore, and $500 each to GOP presidential hopefuls Bush and Bob Dole.

A spokesman for Perelman, James Conroy, acknowledged that his boss in 1988 may have slightly exceeded the limit on contributions subject to federal law. But he argued that $5,000 of Perelman's $30,500 in donations reported to the FEC should not be subject to federal law because it was given to the Presidential Trust, a Republican Party fund, which Perelman mistakenly thought was a soft-

Another corporate raider, Riklis, 77, the Beverly Hills billionaire who owns the retail conglomerate Rapid-American and has been in the business of buying out corporations much longer than Simmons, Kravis and Perelman, also exceeded the limit on political giving by $1,000 in 1988, according to FEC records. Riklis' wife, singer Pia Zadora, gave $23,000, and his son, Ira, contributed $29,500, more than the law allows, to a list of candidates that was similar but not identical.

Attorney Arnold Brozer said the elder Riklis was under the mistaken impression the law would allow him to credit a $1,000 contribution to Biden's 1988 presidential campaign to 1987, since that was the year Biden dropped out of the race. He said Ira assumed that one of his federal contributions—he could not remember to whom—was a soft-money gift outside the purview of federal law.

"It was believed by both Ira and Meshulam [at the time they contributed the money] that they were not violating the law," Brozer said.

Breaks Pattern

The political giving of the Riklis family does not fit the pattern established by other corporate raiders. None of the candidates funded by Riklis are members of committees with direct jurisdiction over legislation affecting corporate takeovers or the varied business interests of his vast financial empire.

The favorite candidate of the Riklis family was Biden, the Delaware Democrat who is chairman of the Senate Judiciary Committee. He received $12,000 in campaign contributions from the Riklis family during the past three years for his Senate and presidential campaigns.

Friends say Riklis' son, Ira, is primarily responsible for these contributions. While a student at Wharton Business School, Ira met with Biden, decided he liked the Delaware senator's policies and persuaded his whole family to contribute.

It is not just the corporate raiders who have exceeded the limit on campaign contributions. The list includes men and women with other interests in Washington as

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In supermarket tabloids, Donald Trump is known primarily for his stormy divorce battle with his wife, Ivana. In New York City, he is known as the owner of Trump Tower and the Trump Shuttle. But among many candidates for high office, it seems, he is known as a soft touch.

Federal records show that Trump made $42,300 in contributions subject to federal law during 1988 and exceeded the federal limit by $17,300. He also gave $100,000 in soft-money to Team 100, and his family members kicked in another $13,500 in contributions to various candidates.

Trump's beneficiaries range across the ideological spectrum from liberal Rep. Ted Weiss (D-N.Y.) to conservative Rep. Jim Courter (R-N.J.). Sources within the Republican and Democratic Parties say Trump appears to contribute money to politicians primarily because it gives him an opportunity to socialize with the nation's leaders.

Anthony Gliedman, an executive vice president of the Trump Organization, said that when his boss learned a year ago that he had exceeded the $25,000 limit in 1988, he quickly asked for refunds. But Gliedman knew of no refunds received by Trump, and none of the recipients have reported any refunds to the FEC, as required under federal law.

Andreas, chairman of Archer Daniels Midland Co., one of the largest grain trading firms in the world, has long been an acknowledged leader in the art of influencing government officials. He has been friends with every President since Harry S. Truman and currently makes frequent trips to Moscow in his corporate jet for private meetings with Soviet President Mikhail S. Gorbachev.

The grain industry enjoys government subsidies at every level of production and distribution—all of them regulated by Congress and the Administration in close consultation with the big agricultural leaders such as Andreas. Archer Daniels Midland owes much of its overseas sales to U.S. grain export subsidies.

Find Check

Two decades ago, Andreas played an unwitting role in the development of the legislation that he now appears to be violating. The law was written after Watergate investigators discovered that a $25,000 check written by Andreas to the 1972 campaign of President Nixon had found its way into a Miami bank account of Bernard L. Barker, one of those arrested in the Watergate break-in.

That embarrassing disclosure did nothing to dampen Andreas' eagerness to contribute money to the American electoral system. To this day, he remains a stalwart financial backer of the Republican Party and a contributor to many Democratic candidates as well. In fact, Andreas, a regular churchgoer, has said he views political giving as an obligation similar to his commitment to contribute to his church.

In 1988, according to FEC records, Andreas made $28,680 in political contributions that are subject to federal law—or $3,680 more than the limit. Claudia Madding, a spokeswoman, said Andreas inadvertently violated the limit because he did not understand that contributions to candidates in a non-election year are attributed to the year in which the candidate stands for election.

In addition, Andreas' wife, Dorothy Inez, gave at least $27,680—or $2,680 over the limit—to a nearly identical list of candidates. Eight other Andreas relatives contributed a total of $99,500 to a similar list of candidates.

The Andreas family list of favored candidates is replete with members of Congress who have big roles in making tax and agriculture policy governing export and sales of U.S. grain, such as House Agriculture Committee Chairman E. (Kika) de la Garza (D-Tex.). Andreas also gave a $100,000 contribution to Team 100, the Bush campaign's soft-money fund.

The Hunt family of Texas gave $148,000 in 1987 through 1989 to a list of candidates dominated by Texas advocates of the oil industry. The leading contributors in the Hunt family were Caroline Rose, 77, who gave $25,700 in 1988—$700 over the limit—and her half-brother Ray, 47, who contributed $17,000 plus $10,000 in soft money.

Jim Oberwetter, a spokesman for Caroline Rose Hunt, who runs a chain of posh hotels, said her $10,000 contribution to the GOP Presidential Trust was a soft-money donation not subject to federal law. But Republican spokeswoman Leslie Goodman said all contributions to the Presidential Trust are subject to federal law. She added that party records show that a letter was sent to Hunt advising her that the donation was not soft money.

Some wealthy donors, such as Disney President and Chief Executive Officer Frank G. Wells, say they are meticulous about keeping their political giving within the letter of the law. In fact, Wells and other top Disney executives use a computer program designed for them by their lawyers to keep them from violating the law.

Family Donations

Federal and state records show that Wells, 58, and his wife, Luanne, gave at least $118,250 to candidates and political organizations over the last three years, including $50,000 in soft-money contributions to the Democratic Party and a $5,000 donation last year to the California Democratic Central Committee.

Like other Disney executives, Wells favors candidates supported by the Motion Picture Assn. of America. These include Rep. Jack Brooks (D-Tex.), whose subcommittee on economic and commercial law has jurisdiction over many film industry issues, and California Democrats such as Reps. Howard L. Berman of Panorama City, Henry A. Waxman of Los Angeles and Anthony C. Beilenson of Los Angeles.

The Disney group also gave generously to the campaign of Sen. Bill Bradley (D-N.J.), but that was a different matter. Although Bradley serves on the tax-writing Senate Finance Committee, he is also a close friend of Disney chairman Michael Eisner and a man whom Disney executives would like to see run for President in 1992.

Another big Hollywood giver, MCA chairman Wasserman, 76, has also carefully monitored his contributions ever since December, 1980, when the FEC fined him $250 for exceeding the $25,000 maximum. His wife, Edith, also gives to political causes.

Over the past three years, Wasserman has made $72,000 in contributions that were subject to federal law and his wife has given $37,500, according to FEC records. In addition, he was among those who gave $100,000 to Dukakis' soft-money fund in 1988.

Like Wasserman, Texas oilman Perry Richardson Bass, 75, was fined $250 by the FEC in 1981 for violating the $25,000 limit. Although he said he had intended that half of the contributions be listed in the name of his wife, Nancy Lee, there was no record of this. The FEC ruled that in order for a contribution to be recorded in the name of both spouses, the check or an accompanying letter must be signed by both. Otherwise, the full donation would be counted as coming from the individual who signed the check.

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The fine did not discourage the Bass family from giving huge sums of money to political candidates. Bass, his four multimillionaire sons, Sid, 46, Edward, 44, Robert, 41 and Lee, 33, as well as other relatives gave more than $680,000 over the past three years, making them the most generous family in The Times survey. These gifts included soft-money contributions of nearly $400,000 to Bush, Dukakis and the Texas Republican Party.

Associated Press

Buyout specialist Ronald O. Perelman gave $100,000 soft-money contributions each to Republican and Democratic groups.

Gives to Texans

The Bass family, whose wealth was derived originally from Texas oil, have contributed primarily to Texas politicians such as Democrats Bentsen, Reps. Martin Frost and Jim Chapman and former House Speaker Jim Wright, and Republicans including Sen. Phil Gramm and Reps. Joe L. Barton, Dick Armey and Lamar Smith. They have also contributed to PACs that advocate the views of the oil industry.

Although most rich contributors insist that their relatives' giving is independent of their own, Lester Crown, 64, whose $2-billion financial empire includes a 22% interest in General Dynamics, readily admits some cooperation with family members.

The Crown family contributed more than $154,000 over the past three years to a long list of House and Senate members whose committee assignments give them jurisdiction over arms sales, such as House Armed Services Committee Chairman Les Aspin (D-Wis.). Among other things, General Dynamics manufactures the F-16 fighter plane used by the U.S. Navy and many foreign governments.

A Crown spokesman explained that many contributions attributed to Lester in federal records were actually made by his 96-year-old father, Henry. "His dad gave the money," explained an aide, "but his father was not available that day, so Lester signed his dad's check."

MINDY SCHAUER / For The Times

Developer Donald Trump, known to some as a soft touch, made $42,300 in contributions subject to federal restrictions in 1988.

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CAMPAIGN CONTRIBUTIONS OF THE SIMMONS CLAN

Harold C. Simmons

Source: Federal Election Commission

Contributions of the family of Texas corporate takeover specialist Harold C. Simmons to federal candidates:

	1987	1988	1989
Harold C.	$24,660	$59,958	$22,250
Annette (wife)		10,750	5,000
Andrea (daughter)	5,000	16,000	
Lisa (daughter)	10,000	14,000	5,000
Scheryle (daughter)	10,000	17,000	
Serena (daughter)		4,000	5,000
Douglas (brother)		4,800	
G. Reuben (brother)		8,375	
Mrs. G. Reuben		2,000	
Total	$49,600	$136,883	$37,250

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DAN MICA FOR SENATE		APRIL QUARTERLY	GENERAL	1,000
88SEN/008/2343 0374939 CONTRIBUTION	JOHNSON AND CO	4JAN88		
SIMMONS, GWEN RS	CLEARWATER	FL 34630 SENATE		
GUNTER FOR U S SENATE COMMITTEE		PRE-PRIMARY	PRIMARY	500
88SEN/015/0432 0475357 CONTRIBUTION	ARTIST	6AUG88		
SIMMONS, HARDWICK	NEW YORK	NY 10128 PRESIDENTIAL		
JACK KEMP FOR PRESIDENT		OCTOBER QUARTERLY	PRIMARY	500
87FEC/488/1168 0104013 CONTRIBUTION	SHEARSON LEHMAN BROTHERS	30SEP87		
SIMMONS, HARDWICK	NEW YORK	NY 10128 SENATE		
PETE DAWKINS FOR SENATE		MID-YEAR REPORT	PRIMARY	1,000
87SEN/008/2806 0143718 CONTRIBUTION	SHEARSON LEHMAN BROS	30JUN87		
SIMMONS, HARDWICK	NEW YORK	NY 10128 SENATE		
PETE DAWKINS FOR SENATE		MID-YEAR REPORT	GENERAL	1,000
87SEN/008/2806 0143719 CONTRIBUTION	SHEARSON LEHMAN BROS	30JUN87		

CONTRIBUTOR/LENDER/TRANSFERRER REPORTING ENTITY MICROFILM LOCATION	STREET ADDRESS TRANSACTION TYPE	CITY	STATE ZIP REPORT TYPE DATE	TYPE OF FILER ELECTION	AMOUNT
SIMMONS, HARDWICK		NEW YORK	NY 10128 SENATE		
BILL BRADLEY FOR U S SENATE '90			MID-YEAR REPORT	PRIMARY	1,000
87SEN/008/2698 0162462 CONTRIBUTION		SHEARSON LEHMAN BROTHERS	10JUN87		
SIMMONS, HARDWICK/CHALLENGE '88			SENATE		
FRIENDS OF SENATOR DAVID KARNES			PRE-GENERAL	GENERAL	1,000
88SEN/021/3529 0606047 EARMARKED CONTRIBUTION			13OCT88		
SIMMONS, HARDWICK/CHALLENGE '88			SENATE		
WALLOP SENATE DRIVE, INC			PRE-GENERAL	GENERAL	1,000
88SEN/021/0334 0616578 EARMARKED CONTRIBUTION			6OCT88		
SIMMONS, HARDWICK MR		NEW YORK	NY 10128 PRESIDENTIAL		
DOLE FOR PRESIDENT COMMITTEE INC			YEAR-END	PRIMARY	1,000
88FEC/490/1019 0195221 CONTRIBUTION		SHEARSON LEHMAN & BROTHERS	9DEC87		
SIMMONS, HARDWICK MR		NEW YORK	NY 10128 PRESIDENTIAL		
JACK KEMP FOR PRESIDENT			SEPTEMBER MONTHLY	PRIMARY	150-
88FEC/548/0684 0494669 CONTRIBUTION REF TO INDIVIDUAL			30NOV88		
SIMMONS, HARDWICK MR		NEW YORK	NY 10128 PARTY QUALIFIED		
REPUBLICAN NATIONAL COMMITTEE - CONTRIBUTIONS (AKA REPUBLICAN NATIONAL FINANCE COMMITTEE			OCTOBER QUARTERLY	PRIMARY	10,000
88FEC/552/1579 0514549 CONTRIBUTION		SHEARSON LEHMAN HUTTON	13JUL88		
SIMMONS, HAROLD		DALLAS	TX 75225 NON-PARTY QUALIFIED		
NL INDUSTRIES INC POLITICAL ACTION COMMITTEE			MID-YEAR REPORT	PRIMARY	5,000
87FEC/473/0765 9035446 CONTRIBUTION		NL INDUSTRIES INC	27JUN87		

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CONTRIBUTOR/LENDER/TRANSFERRER / REPORTING ENTITY / MICROFILM LOCATION / TRANSACTION TYPE	STREET ADDRESS	CITY	STATE ZIP	TYPE OF FILER / REPORT TYPE / DATE	ELECTION	AMOUNT
PETE DU PONT FOR PRESIDENT 87FEC/475/5165 00510089 CONTRIBUTION		CONTRAN CORPORATION		JULY QUARTERLY 14APR87	PRIMARY	1,000
SIMMONS, HAROLD DOLE FOR PRESIDENT COMMITTEE INC 87FEC/475/0979 0061861 CONTRIBUTION		DALLAS	TX 75225	PRESIDENTIAL JULY QUARTERLY 17APR87	PRIMARY	1,000
SIMMONS, HAROLD DOLE FOR PRESIDENT COMMITTEE INC 87FEC/475/1248 0062819 CONTRIBUTION REF TO INDIVIDUAL		DALLAS	TX 75225	PRESIDENTIAL JULY QUARTERLY 30JUN87	PRIMARY	250-
SIMMONS, HAROLD NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE 87FEC/408/0071 0073944 CONTRIBUTION		DALLAS	TX 75234	NON-PARTY QUALIFIED MID-YEAR REPORT 9FEB87	PRIMARY	5,000
SIMMONS, HAROLD PETE DU PONT FOR PRESIDENT 87FEC/476/4228 0100386 CONTRIBUTION		DALLAS CONTRON CORP	TX 75240	PRESIDENTIAL OCTOBER QUARTERLY 25SEP87	PRIMARY	1,000

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CONTRIBUTOR/LENDER/TRANSFERRER / REPORTING ENTITY / MICROFILM LOCATION / TRANSACTION TYPE	STREET ADDRESS	CITY	STATE ZIP	TYPE OF FILER / REPORT TYPE / DATE	ELECTION	AMOUNT
SIMMONS, HAROLD SIMPSON SENATE COMMITTEE 1990 87SEN/007/3481 0134548 MEMO(FILER'S I OF CONTRB GIVEN TO JT FR) OIL & GAS		DALLAS	TX 75240	SENATE MID-YEAR REPORT 31MAR87	PRIMARY	1,000
SIMMONS, HAROLD WALLOP SENATE DRIVE, INC 87SEN/009/0223 0134635 MEMO(FILER'S I OF CONTRB GIVEN TO JT FR) CONTRAN CORP		DALLAS	TX 75240	SENATE MID-YEAR REPORT 23APR87	PRIMARY	1,666
SIMMONS, HAROLD SIMPSON THEATRE COMMITTEE 87SEN/007/3457 0135867 CONTRIBUTION		DALLAS EXECUTIVE/OIL & GAS	TX 75240	SENATE MID-YEAR REPORT 31MAR87	PRIMARY	1,000 TERMINATED
SIMMONS, HAROLD FRIENDS OF MATTINGLY 87SEN/008/2279 0139887 CONTRIBUTION		DALLAS	TX 75240	SENATE MID-YEAR REPORT 26MAR87	GENERAL	1,000
SIMMONS, HAROLD ACEMEN '88 87SEN/008/3719 0140220 CONTRIBUTION		DALLAS	TX 75244	HOUSE MID-YEAR REPORT 9JUN87	PRIMARY	500
SIMMONS, HAROLD WTH REELECTION COMMITTEE 87SEN/009/0277 0141208 CONTRIBUTION		DALLAS CONTRAN CORP	TX 75240	SENATE MID-YEAR REPORT 23APR87	PRIMARY	5,000
SIMMONS, HAROLD HATCH ELECTION COMMITTEE 87SEN/009/1267 0141574 CONTRIBUTION		DALLAS CONTRAN CORP	TX 75240	SENATE MID-YEAR REPORT 21APR87	PRIMARY	1,000

HATCH ELECTION COMMITTEE				
07SEN/009/1267 0141575 CONTRIBUTION	CONTRAN CORP	MID-YEAR REPORT 21APR87	GENERAL	1,000
SIMMONS, HAROLD	DALLAS	TX 75240 SENATE		
FRIENDS OF PAUL TRIBLE		MID-YEAR REPORT	PRIMARY	1,000
07SEN/009/0139 0143499 MEMO(FILER'S I OF CONTRB GIVEN TO JT FR)	CONTRAN CORP	4MAY87		
SIMMONS, HAROLD	DALLAS	TX 75240 SENATE		
FRIENDS OF PAUL TRIBLE		MID-YEAR REPORT	GENERAL	666
07SEN/009/0139 0143506 MEMO(FILER'S I OF CONTRB GIVEN TO JT FR)	CONTRAN CORP	4MAY87		
SIMMONS, HAROLD	DALLAS	TX 75240 SENATE		
HECHT REELECTION COMMITTEE		MID-YEAR REPORT	PRIMARY	1,000
07SEN/006/4148 0146939 CONTRIBUTION	CONTRAN CORPORATION	24APR87		
SIMMONS, HAROLD	DALLAS	TX 75240 SENATE		
HECHT REELECTION COMMITTEE		MID-YEAR REPORT	GENERAL	1,000
07SEN/006/4148 0146941 CONTRIBUTION	CONTRAN CORPORATION	24APR87		

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INDIVIDUAL CONTRIBUTOR--DATABASE REPORT

CONTRIBUTOR/LENDER/TRANSFERRER / REPORTING ENTITY / MICROFILM LOCATION / TRANSACTION TYPE	STREET ADDRESS	CITY	STATE ZIP / REPORT TYPE / DATE	TYPE OF FILER / ELECTION	AMOUNT
SIMMONS, HAROLD		DALLAS	TX 75240 HOUSE		
FRIENDS OF DICK ARMEY			MID-YEAR REPORT	PRIMARY	1,000
07HSE/337/1809 0152253 CONTRIBUTION		INVESTMENTS	22MAY87		
SIMMONS, HAROLD		DALLAS	TX 75240 HOUSE		
FRIENDS OF DICK ARMEY			MID-YEAR REPORT	GENERAL	1,000
07HSE/337/1813 0152272 CONTRIBUTION		INVESTMENTS	22MAY87		
SIMMONS, HAROLD		DALLAS	TX 75240 HOUSE		
ORTIZ FOR CONGRESS			MID-YEAR REPORT	PRIMARY	500
07HSE/336/4477 0154807 CONTRIBUTION		CONTRON CORP	26MAY87		
SIMMONS, HAROLD		DALLAS	TX 75240 NON-PARTY QUALIFIED		
U S FEDERATION OF SMALL BUSINESSES PAC (SMALL BIZ PAC)			YEAR-END	PRIMARY	5,000
08FEC/391/4953 0181655 CONTRIBUTION		VALHI INC	18DEC87		
SIMMONS, HAROLD		DALLAS	TX 75240 PRESIDENTIAL		
PETE DU PONT FOR PRESIDENT			YEAR-END	PRIMARY	1,000-
08FEC/490/4784 0200141 CONTRIBUTION REF TO INDIVIDUAL			05OCT87		
SIMMONS, HAROLD		DALLAS	TX 75240 NON-PARTY NON-QUALIFIED		
DALLAS CITIZENS PAC (FKA DALLAS GOOD CANDIDATE COMMITTEE)			YEAR-END	PRIMARY	5,000
08FEC/303/1679 0216523 CONTRIBUTION		INVESTMENTS	11DEC87		
SIMMONS, HAROLD		DALLAS	TX 75240 SENATE		
FRIENDS OF PAUL TRIBLE			YEAR-END	PRIMARY	833-
08SEN/004/0242 0220413 CONTRIBUTION REF TO INDIVIDUAL			19DEC87		

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SIMMONS, HAROLD HAYDN ELECTION COMMITTEE 88SEN/001/3859 0243635 CONTRIBUTION REF TO INDIVIDUAL	DALLAS	TX 75240	SENATE YEAR-END 22OCT87	PRIMARY	1,000-
SIMMONS, HAROLD FRIENDS OF SENATOR DAVID KARNES 88SEN/006/1424 0279746 CONTRIBUTION	DALLAS	TX 75240	SENATE YEAR-END 27OCT87	PRIMARY AMENDMENT	1,000
SIMMONS, HAROLD TEXANS FOR BEAU BOULTER 88SEN/006/2685 0299813 CONTRIBUTION	DALLAS CONTRAN CORPORATION	TX 75240	SENATE APRIL QUARTERLY 28MAR88	RUNOFF	1,000
SIMMONS, HAROLD RICK HUTCHISON FOR UNITED STATES SENATE COMMITTEE 88SEN/008/2282 0316801 CONTRIBUTION	DALLAS CONTRAN	TX 75240	SENATE APRIL QUARTERLY 7MAR88	PRIMARY	1,000
SIMMONS, HAROLD CONSERVATIVES ACTING FOR TEXANS POLITICAL ACTION COMMITTEE 88FEC/520/4893 0319511 CONTRIBUTION	DALLAS CONTRAN	TX 75240	NON-PARTY QUALIFIED APRIL QUARTERLY 18FEB88	PRIMARY	5,000

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INDIVIDUAL CONTRIBUTOR--DATABASE REPORT

CONTRIBUTOR/LENDER/TRANSFERRER REPORTING ENTITY MICROFILM LOCATION TRANSACTION TYPE	STREET ADDRESS	CITY	STATE ZIP	TYPE OF FILER REPORT TYPE DATE	ELECTION	AMOUNT
SIMMONS, HAROLD PETE DAWKINS FOR SENATE 88SEN/008/1526 0320329 CONTRIBUTION		DALLAS	TX 75240	SENATE APRIL QUARTERLY 8FEB88	PRIMARY	1,000
SIMMONS, HAROLD DALLAS CITIZENS PAC (FKA DALLAS GOOD CANDIDATE COMMITTEE) 88FEC/522/0121 0321780 CONTRIBUTION REF TO INDIVIDUAL		DALLAS	TX 75240	NON-PARTY NON-QUALIFIED APRIL QUARTERLY 12FEB88	PRIMARY	4,000-
SIMMONS, HAROLD KIRKLAND & ELLIS PAC (FKA KEE PAC) 88FEC/525/2679 0335234 CONTRIBUTION		DALLAS CONTRAN CORPORATION	TX 75240	NON-PARTY QUALIFIED APRIL QUARTERLY 28MAR88	PRIMARY	5,000
SIMMONS, HAROLD JOHN D DINGELL FOR CONGRESS COMMITTEE 88HSE/347/2009 0330492 CONTRIBUTION		DALLAS VALKI INC	TX 75240	HOUSE APRIL QUARTERLY 29JAN88	PRIMARY	1,000
SIMMONS, HAROLD MARKEY FOR CONGRESS COMMITTEE 88HSE/344/4217 0342798 CONTRIBUTION		DALLAS CONTRAN CORP	TX 75240	HOUSE APRIL QUARTERLY 3FEB88	PRIMARY	1,000
SIMMONS, HAROLD CONSERVATIVE VICTORY COMMITTEE 88FEC/537/4052 0396336 CONTRIBUTION		DALLAS	TX 75240	NON-PARTY QUALIFIED JULY MONTHLY 30JUN88	PRIMARY	5,000
SIMMONS, HAROLD MICHEL FOR CONGRESS COMMITTEE 88HSE/382/3046 0423346 CONTRIBUTION		DALLAS CONTRAN CORPORATION	TX 75240	HOUSE JULY QUARTERLY 29APR88	GENERAL	1,000

SIMMONS, HAROLD	DALLAS	TX 75240 HOUSE		
WILLIAMS CONGRESS '88		JULY QUARTERLY	GENERAL	500
88HSE/35A/2754 0425091 CONTRIBUTION	CONTRAN CORP	30JUN88		
SIMMONS, HAROLD	DALLAS	TX 75244 SENATE		
RE-ELECT SENATOR FRANK MURKOWSKI COMMITTEE		MID-YEAR REPORT	PRIMARY	1,000
88SEN/014/0776 0447723 CONTRIBUTION	CONTRAN CORPORATION	18APR88		
SIMMONS, HAROLD	DALLAS	TX 75240 SENATE		
JEFFORDS-HACK VICTORY COMMITTEE		JULY QUARTERLY	PRIMARY	2,000
88SEN/013/0154 0451268 CONTRIBUTION	SELF-EMPLOYED	31MAY88		
SIMMONS, HAROLD	DALLAS	TX 75240 SENATE		
KENT HANCE FOR SENATE COMMITTEE		YEAR-END	PRIMARY	1,000
88SEN/014/1821 0452505 CONTRIBUTION	CONTRAN CORPORATION	30DEC87		AMENDMENT
SIMMONS, HAROLD	DALLAS	TX 75234 HOUSE		
FRIENDS OF BOBBY SMITH		JULY QUARTERLY	GENERAL	1,000
88HSE/355/2327 0455707 CONTRIBUTION	EXECUTIVE	31MAY88		

CONTRIBUTOR/LENDER/TRANSFERER REPORTING ENTITY MICROFILM LOCATION TRANSACTION TYPE	STREET ADDRESS	CITY	STATE ZIP TYPE OF FILER REPORT TYPE DATE	ELECTION	AMOUNT
SIMMONS, HAROLD		DALLAS	TX 75240 SENATE		
FRIENDS OF PAUL TRIBLE			MID-YEAR REPORT	PRIMARY	166-
88SEN/014/0200 0460224 CONTRIBUTION REF TO INDIVIDUAL			18FEB88		
SIMMONS, HAROLD		DALLAS	TX 75240 HOUSE		
MIKE SYNAR FOR CONGRESS COMMITTEE			JULY QUARTERLY	PRIMARY	500
88HSE/354/3087 0470679 CONTRIBUTION		VALHI INC	28JUN88		
SIMMONS, HAROLD		DALLAS	TX 75240 SENATE		
FRIENDS OF CONNIE MACK			PRE-PRIMARY	PRIMARY	1,000
88SEN/016/2465 0490934 MEMO(FILER'S I OF CONTRB GIVEN TO JT FR)		INVESTOR	21MAY88		AMENDMENT
SIMMONS, HAROLD		DALLAS	TX 75234 NON-PARTY QUALIFIED		
CONSERVATIVES ACTING FOR TEXANS POLITICAL ACTION COMMITTEE			OCTOBER QUARTERLY	PRIMARY	5,000
88FEC/592/2121 0522643 CONTRIBUTION		CONTRAN CORP	12NOV88		
SIMMONS, HAROLD		DALLAS	TX 75225 SENATE		
PEOPLE FOR JOHN HEINZ COMMITTEE			OCTOBER QUARTERLY	GENERAL	1,000
88SEN/019/3906 0562554 CONTRIBUTION		CONTRAN	22JUL88		
SIMMONS, HAROLD		DALLAS	TX 75240 HOUSE		
JOHN BRYANT CAMPAIGN COMMITTEE			OCTOBER QUARTERLY	GENERAL	1,000
88HSE/262/3374 0594182 CONTRIBUTION		CONTRAN CORP	30SEP88		
SIMMONS, HAROLD		DALLAS	TX 75240 SENATE		
PETE WILSON FOR SENATE			YEAR-END	GENERAL	500
89SEN/001/1393 0682267 CONTRIBUTION		CONTRAN CORPORATION	25DEC88		

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SIMMONS, HAROLD C CONTRAN CORPORATION POLITICAL ACTION COMMITTEE (CONPAC) 87FEC/473/4274 0067205 CONTRIBUTION	DALLAS CONTRAN CORPORATION	TX 75225 NON-PARTY QUALIFIED MID-YEAR REPORT 15APR87	PRIMARY	5,000
SIMMONS, HAROLD MR CAMPAIGN AMERICA 87FEC/460/5396 0008895 CONTRIBUTION	DALLAS	TX 75234 NON-PARTY QUALIFIED FEBRUARY MONTHLY 29JAN87	PRIMARY	2,000
SIMMONS, HAROLD MR FREE CONGRESS PAC (FORMERLY: CMTE FOR THE SURVIVAL OF A FREE CONGRESS) 87FEC/465/4268 0016445 CONTRIBUTION	DALLAS CONTRAN CORPORATION	TX 75244 NON-PARTY QUALIFIED APRIL MONTHLY 23MAR87	PRIMARY	1,000
SIMMONS, HAROLD MR SENATE DEFENSE AND ECONOMIC POLITICAL ACTION COMMITTEE (FKA SEN JOHN TOWER PAC) 87FEC/482/3170 0116262 CONTRIBUTION	DALLAS CONTRAN CORPORATION	TX 75234 NON-PARTY QUALIFIED MID-YEAR REPORT 30JAN87	PRIMARY	660
SIMMONS, HAROLD MR SENATOR LLOYD BENTSEN ELECTION COMMITTEE 87SEN/007/3226 0144375 CONTRIBUTION	DALLAS CONTRAN CORPORATION	TX 75234 SENATE MID-YEAR REPORT 30JAN87	PRIMARY	1,000

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SIMMONS, HAROLD MR CONGRESSMAN JOE BARTON COMMITTEE 87HSE/336/3748 0135479 CONTRIBUTION		DALLAS CONTRAN CORP	TX 75234 HOUSE MID-YEAR REPORT 22APR87	PRIMARY	1,000
SIMMONS, HAROLD MR GEORGE BUSH FOR PRESIDENT, INC 88FEC/505/1641 0186893 CONTRIBUTION		DALLAS CONTRAN CORP	TX 75240 PRESIDENTIAL YEAR-END 20OCT87	PRIMARY	500
SIMMONS, HAROLD MR TEXANS FOR BEAU BOULTER 88HSE/340/3495 0260782 CONTRIBUTION		DALLAS CONTRAN CORPORATION	TX 75240 SENATE YEAR-END 10OCT87	PRIMARY	1,000
SIMMONS, HAROLD MR ALBERT GORE JR FOR PRESIDENT COMMITTEE INC 88FEC/511/5051 0262394 CONTRIBUTION		DALLAS	TX 75240 PRESIDENTIAL MARCH MONTHLY 16FEB88	PRIMARY	1,000
SIMMONS, HAROLD MR STEVE BARTLETT CONGRESSIONAL CAMPAIGN COMMITTEE 88HSE/345/0790 0263588 CONTRIBUTION		DALLAS CONTRAN CORPORATION	TX 75240 HOUSE PRE-PRIMARY 29JAN88	GENERAL	1,000
SIMMONS, HAROLD MR STEVE BARTLETT CONGRESSIONAL CAMPAIGN COMMITTEE 88HSE/343/0277 0280175 CONTRIBUTION		DALLAS CONTRAN CORPORATION	TX 75225 HOUSE YEAR-END 26OCT87	PRIMARY	875
SIMMONS, HAROLD MR FRIENDS OF DICK LUGAR 88SEN/006/2242 0301416 CONTRIBUTION		DALLAS CONTRAN CORPORATION	TX 75240 SENATE APRIL QUARTERLY 20JAN88	PRIMARY	1,000

SIMMONS, HAROLD MR FRIENDS OF DICK LUBAR 88SEN/006/22452 8301417 CONTRIBUTION	DALLAS CONTRAN CORPORATION	TX 75240 SENATE APRIL QUARTERLY 20JAN88	GENERAL	1,000
SIMMONS, HAROLD MR FRIENDS OF VOINOVICH 88SEN/008/2931 8306604 CONTRIBUTION	DALLAS CONTRAN CORP	TX 75240 SENATE APRIL QUARTERLY 22FEB88	PRIMARY	1,000
SIMMONS, HAROLD MR NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS F 88SEN/007/0977 8327275 CONTRIBUTION	DALLAS PRESIDENT	TX 75225 PARTY QUALIFIED APRIL QUARTERLY 26JAN88	PRIMARY	2,000
SIMMONS, HAROLD MR DANFORTH FOR SENATE COMMITTEE 88SEN/008/1307 8309517 CONTRIBUTION	DALLAS CONTRAN GROUP	TX 75240 SENATE APRIL QUARTERLY 11FEB88	PRIMARY	500
SIMMONS, HAROLD MR HAIG FOR PRESIDENT 88FEC/531/0989 8370140 CONTRIBUTION	DALLAS	TX 75240 PRESIDENTIAL JUNE MONTHLY 10MAY88	PRIMARY	1,000

CONTRIBUTOR/LENDER/TRANSFERRER REPORTING ENTITY MICROFILM LOCATION	STREET ADDRESS TRANSACTION TYPE	CITY	STATE ZIP REPORT TYPE DATE	TYPE OF FILER ELECTION	AMOUNT
SIMMONS, HAROLD MR GEORGE BUSH FOR PRESIDENT INC COMPLIANCE 88FEC/539/1277 8401004 CONTRIBUTION		DALLAS CONTRAN CORP	TX 75240 PRESIDENTIAL JULY MONTHLY 23JUN88	GENERAL	500
SIMMONS, HAROLD MR CALIFORNIANS FOR PETE WILSON 1994 88SEN/011/1205 8417525 CONTRIBUTION		DALLAS BUS EXECUTIVE	TX 75240 SENATE JULY QUARTERLY 30JUN88	GENERAL	1,000
SIMMONS, HAROLD MR FRIENDS OF PHIL GRAMM 88SEN/014/2008 8443604 CONTRIBUTION		DALLAS INVESTMENTS	TX 75234 SENATE MID-YEAR REPORT 23JAN88	GENERAL	1,000
SIMMONS, HAROLD MR FRIENDS OF PHIL GRAMM 88SEN/014/2072 8444980 CONTRIBUTION REF TO INDIVIDUAL		DALLAS	TX 75234 SENATE MID-YEAR REPORT 23JAN88	PRIMARY	1,000-
SIMMONS, HAROLD MR FRIENDS OF PHIL GRAMM 88SEN/014/2072 8444981 CONTRIBUTION REF TO INDIVIDUAL		DALLAS	TX 75234 SENATE MID-YEAR REPORT 2FEB88	PRIMARY	1,000-
SIMMONS, HAROLD MR FRIENDS FOR SLADE GORTON 1988 88SEN/016/0102 8485258 CONTRIBUTION		DALLAS CONTRAN CORP	TX 75240 SENATE PRE-PRIMARY 18JUL88	PRIMARY	1,000
SIMMONS, HAROLD MR CONGRESSMAN JOE BARTON COMMITTEE 88HSE/363/0784 8614249 CONTRIBUTION		DALLAS CONTRAN CORP	TX 75240 HOUSE OCTOBER QUARTERLY 13JUL88	GENERAL	1,000

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INDIVIDUAL CONTRIBUTOR--DATABASE REPORT

CONTRIBUTOR/LENDER/TRANSFERRER REPORTING ENTITY MICROFILM LOCATION TRANSACTION TYPE	STREET ADDRESS	CITY	STATE ZIP REPORT TYPE DATE	TYPE OF FILER ELECTION	AMOUNT
KRAVIS, CAROLYNE R PETE DAWKINS FOR SENATE 88SEN/004/4403 0246713 CONTRIBUTION		NEW YORK FASHION DESIGNR	NY 10021 SENATE YEAR-END 31DEC87	PRIMARY	1,000
KRAVIS, GEORGE PETER HOAGLAND FOR CONGRESS COMMITTEE 88HSE/367/0538 0438616 CONTRIBUTION		OMAHA KUTAK ROCK	NE 68102 HOUSE PRE-GENERAL 11OCT88	GENERAL	500
KRAVIS, HEDI 500 CLUB 88FEC/567/3428 0622908 CONTRIBUTION		NEW YORK DESIGN	NY 10028 NON-PARTY QUALIFIED POST-GENERAL 20NOV88	PRIMARY	500
KRAVIS, HELENE DIANE MS 500 CLUB 88FEC/498/1892 0165699 CONTRIBUTION		NEW YORK DESIGN	NY 10028 NON-PARTY QUALIFIED YEAR-END 31DEC87	PRIMARY	500
KRAVIS, HELENE DIANE S DAWKINS FOR SENATE 88SEN/018/3970 0534494 CONTRIBUTION		NEW YORK	NY 10028 SENATE OCTOBER QUARTERLY 7SEP88	GENERAL	500
KRAVIS, HELENE S PETE DU PONT FOR PRESIDENT 87FEC/475/5110 0039774 CONTRIBUTION		NEW YORK	NY 10028 PRESIDENTIAL JULY QUARTERLY 11MAY87	PRIMARY	500
KRAVIS, HENRY MOYNIHAN COMMITTEE INC 88SEN/004/1653 0253653 CONTRIBUTION		NEW YORK KOHLBERG KRAVIS	NY 10021 SENATE YEAR-END 30DEC87	PRIMARY	711
KRAVIS, HENRY MOYNIHAN COMMITTEE INC 88SEN/004/1653 0253654 CONTRIBUTION		NEW YORK KOHLBERG KRAVIS	NY 10021 SENATE YEAR-END 30DEC87	GENERAL	289
KRAVIS, HENRY MOYNIHAN COMMITTEE INC 88SEN/007/3036 0335991 CONTRIBUTION		NEW YORK KOHLBERG KRAVIS	NY 10021 SENATE APRIL QUARTERLY 14APR88	GENERAL	711
KRAVIS, HENRY VICTORY '88 COMMITTEE 88FEC/561/5439 0541910 CONTRIBUTION			PARTY QUALIFIED PRE-GENERAL 4OCT88	PRIMARY	1,000
KRAVIS, HENRY MR 500 CLUB 88FEC/498/1890 0165687 CONTRIBUTION		NEW YORK KOLBERG KRAVIS	NY 10021 NON-PARTY QUALIFIED YEAR-END 14JUL87	PRIMARY	500
KRAVIS, HENRY MR METZENBAUM FOR SENATE- 88 88SEN/003/1858 0238392 CONTRIBUTION		NEW YORK INVESTMENT	NY 10021 SENATE YEAR-END 20NOV87	PRIMARY	1,000

CONTRIBUTOR/LENDER/TRANSFERROR / REPORTING ENTITY / MICROFILM LOCATION / TRANSACTION TYPE	STREET ADDRESS	CITY	STATE ZIP / REPORT TYPE / DATE	TYPE OF FILER / ELECTION	AMOUN
KRAVIS, HENRY MR METZENBAUM FOR SENATE- 88 88SEN/003/1888 0238095 CONTRIBUTION		NEW YORK INVESTMENT BROKER	NY 10021 SENATE YEAR-END 20NOV87	GENERAL	1,00
KRAVIS, HENRY R PETE DU PONT FOR PRESIDENT 87FEC/475/5110 0039775 CONTRIBUTION		NEW YORK KKR	NY 10021 PRESIDENTIAL JULY QUARTERLY 12JUN87	PRIMARY	1,00
KRAVIS, HENRY R DOLE FOR PRESIDENT COMMITTEE INC 87FEC/475/0813 0056882 CONTRIBUTION		NEW YORK	NY 10021 PRESIDENTIAL JULY QUARTERLY 6MAY87	PRIMARY	1,00
KRAVIS, HENRY R GEORGE BUSH FOR PRESIDENT, INC 87FEC/475/1889 0059108 CONTRIBUTION		NEW YORK	NY 10021 PRESIDENTIAL JULY QUARTERLY 14MAY87	PRIMARY	2,00
KRAVIS, HENRY R GEORGE BUSH FOR PRESIDENT, INC 87FEC/488/2A20 0111393 CONTRIBUTION		NEW YORK	NY 10021 PRESIDENTIAL OCTOBER QUARTERLY 7JUL87	PRIMARY	1,00
KRAVIS, HENRY R DANFORTH FOR SENATE COMMITTEE 87SEN/006/4007 0149107 CONTRIBUTION		NEW YORK INVESTOR	NY 10019 SENATE MID-YEAR REPORT 30JUN87	PRIMARY	1,00
KRAVIS, HENRY R BILL BRADLEY FOR U S SENATE '90 87SEN/008/2648 0161683 CONTRIBUTION		NEW YORK KOHLBERG, KRAVIS, ROBERTS & CO	NY 10021 SENATE MID-YEAR REPORT 28MAY87	PRIMARY	1,00
KRAVIS, HENRY R FRIENDS OF MAX BAUCUS (1990 CAMPAIGN) 88SEN/001/3062 0227540 CONTRIBUTION		NEW YORK KOHLBERG KRAVIS ROBERTS & COMP	NY 10021 SENATE YEAR-END 29DEC87	PRIMARY	1,00
KRAVIS, HENRY R DANFORTH FOR SENATE COMMITTEE 88SEN/005/3667 0241963 CONTRIBUTION		NEW YORK INVESTOR	NY 10019 SENATE YEAR-END 28DEC87	GENERAL	1,00
KRAVIS, HENRY R PETE DAWKINS FOR SENATE 88SEN/004/4302 0246206 CONTRIBUTION		NEW YORK KOHLBERG KRAVIS ROBE	NY 10019 SENATE YEAR-END 31DEC87	PRIMARY	1,00
KRAVIS, HENRY R PETE DAWKINS FOR SENATE 88SEN/004/4302 0246207 CONTRIBUTION		NEW YORK KOHLBERG KRAVIS ROBE	NY 10019 SENATE YEAR-END 31DEC87	GENERAL	1,00
KRAVIS, HENRY R DUKAKIS FOR PRESIDENT COMMITTEE, INC 88FEC/511/4085 0298229 CONTRIBUTION		NEW YORK KRAVIS & ROBERTS	NY 10021 PRESIDENTIAL MARCH MONTHLY 2FEB88	PRIMARY	1,00

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KRAVIS, HENRY R CALIFORNIANS FOR PETE WILSON 1994 88SEN/004/2143 02A9201	CONTRIBUTION	NEW YORK KOHLBERG KRAVIS ROBERTS & COMPANY	NY 10021	SENATE YEAR-END 31DEC87	PRIMARY	1,000
KRAVIS, HENRY R CALIFORNIANS FOR PETE WILSON 1994 88SEN/004/2143 02A9202	CONTRIBUTION	NEW YORK KOHLBERG KRAVIS ROBERTS & COMPANY	NY 10021	SENATE YEAR-END 31DEC87	GENERAL	1,000
KRAVIS, HENRY R FUND FOR AMERICA'S FUTURE, INC: THE 88FEC/523/2022 K005035	CONTRIBUTION	NEW YORK KOHLBERG KRAVIS ROBERTS & CO	NY 10021	NON-PARTY QUALIFIED APRIL MONTHLY 21MAR88	PRIMARY	5,000
KRAVIS, HENRY R NEW YORK REPUBLICAN COUNTY COMMITTEE 88FEC/520/0050 0319700	CONTRIBUTION	NEW YORK KOHLBERG KRAVIS & ROB	NY 10021	PARTY QUALIFIED APRIL QUARTERLY 23FEB88	PRIMARY	5,000
KRAVIS, HENRY R ELEITER FOR SENATE COMMITTEE 88SEN/007/2260 0376750	CONTRIBUTION	NEW YORK	NY	SENATE APRIL QUARTERLY 14MAR88	PRIMARY	1,000
KRAVIS, HENRY R SENATE MAJORITY FUND 88FEC/535/0919 0429681	CONTRIBUTION	NEW YORK KOHLBERG KRAVIS ROBERTS & CO	NY 10021	NON-PARTY QUALIFIED JULY QUARTERLY 24JUN88	PRIMARY	5,000
KRAVIS, HENRY R CHALLENGE '88 88SEN/010/2510 0433364 MEMO(FILER'S I OF CONTRB GIVEN TO JT FR)		NEW YORK KOHLBERG KRAVIS ROBERTS	NY 10021	PARTY QUALIFIED JULY QUARTERLY 1JUN88	PRIMARY	1,000
KRAVIS, HENRY R PEOPLE FOR JOHN HEINZ COMMITTEE 88SEN/011/2526 0438314	CONTRIBUTION	NEW YORK KOHLBERG KRAVIS ROBERTS & CO	NY 10021	SENATE JULY QUARTERLY 11MAY88	GENERAL	1,000
KRAVIS, HENRY R PEOPLE FOR JOHN HEINZ COMMITTEE 88SEN/011/2562 0438481	CONTRIBUTION	NEW YORK KOHLBERG KRAVIS ROBERTS & CO	NY 10021	SENATE JULY QUARTERLY 1JUN88	GENERAL	1,000
KRAVIS, HENRY R/NATIONAL REPUBLICAN SENATORIAL COMMITTEE FRIENDS OF SENATOR DAVID KARNES 88SEN/012/2008 043P144	EARMARKED CONTRIBUTION			SENATE JULY QUARTERLY 7MAY88	GENERAL	1,000
KRAVIS, HENRY R WALLOP SENATE DRIVE, INC 88SEN/013/1085 0442668	CONTRIBUTION	NEW YORK KOHLBERG KRAVIS ROBER	NY	SENATE JULY QUARTERLY 6JUN88	PRIMARY	1,000
KRAVIS, HENRY R RICK MONTOYA FOR UNITED STATES SENATE COMMITTEE 88SEN/013/1332 0480555	CONTRIBUTION	NEW YORK KOHLBERG KRAVIS ROBERTS & CO	NY 10021	SENATE JULY QUARTERLY 24MAY88	PRIMARY	1,000

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KRAVIS, HENRY R NEW JERSEY REPUBLICAN STATE COMMITTEE 88FEC/336/3960 0530561		NEW YORK GOLDMAN SACHS	NY 10021 PARTY QUALIFIED OCTOBER QUARTERLY 05SEP88	PRIMARY	5,000
KRAVIS, HENRY R ROTH SENATE COMMITTEE 88SEN/020/2297 0574709	CONTRIBUTION	NEW YORK KKR	NY 10021 SENATE PRE-GENERAL 60CT88	GENERAL	1,000
KRAVIS, HENRY R CALIFORNIANS FOR PETE WILSON 1994 88SEN/018/3177 0593222	CONTRIBUTION	NEW YORK KOHLBERG KRAVIS ROBERTS & COMPANY	NY 10021 SENATE OCTOBER QUARTERLY 19SEP88	PRIMARY	1,000
KRAVIS, HENRY R PEOPLE FOR JOHN HEINZ COMMITTEE 88SEN/026/3225 0649649	CONTRIBUTION REF TO INDIVIDUAL	NEW YORK	NY 10021 SENATE POST-GENERAL 27OCT88	GENERAL	1,000
IS, HENRY R MR K KEMP FOR PRESIDENT 87FEC/475/2376 0044163	CONTRIBUTION	NEW YORK	NY 10019 PRESIDENTIAL JULY QUARTERLY 29APR87	PRIMARY	1,000
KRAVIS, HENRY R MR NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS @ 87SEN/006/0421 0075329	CONTRIBUTION	NEW YORK KOHLBERG, KRAVIS, ROBERTS & CO	NY 10019 PARTY QUALIFIED MID-YEAR REPORT 12MAY87	PRIMARY	10,000
KRAVIS, HENRY R MR FUND FOR AMERICA'S FUTURE, INC: THE 87FEC/480/3643 0084995	CONTRIBUTION	NEW YORK	NY 10021 NON-PARTY QUALIFIED MID-YEAR REPORT 15MAY87	PRIMARY	5,000
KRAVIS, HENRY R MR SENATOR LLOYD BENTSEN ELECTION COMMITTEE 87SEN/007/3022 0145625	CONTRIBUTION	NEW YORK KOHLBERG KRAVIS ETA	NY 10019 SENATE MID-YEAR REPORT 21MAY87	PRIMARY	1,000
KRAVIS, HENRY R MR SENATOR LLOYD BENTSEN ELECTION COMMITTEE 88SEN/004/1292 0241136	CONTRIBUTION	NEW YORK KOHLBERG KRAVIS ETA	NY 10021 SENATE YEAR-END 15DEC87	GENERAL	1,000
KRAVIS, HENRY R MR REPUBLICAN NATIONAL COMMITTEE - CONTRIBUTIONS (AKA REPUBLICAN NATIONAL FINANCE COMMITTEE 88FEC/534/3944 0402422	CONTRIBUTION	NEW YORK KOHLBERG KRAVIS ROBERTS & CO	NY 10021 PARTY QUALIFIED JULY QUARTERLY 27JUN88	PRIMARY	10,000
KRAVIS, HENRY R MR NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS @ 88SEN/010/4136 0409860	CONTRIBUTION	NEW YORK GENERAL PARTNER	NY 10019 PARTY QUALIFIED JULY QUARTERLY 20JUN88	PRIMARY	5,000
KRAVIS, HENRY R MR CALIFORNIANS FOR PETE WILSON 1994 88SEN/011/0995 0417194	CONTRIBUTION	NEW YORK INVESTOR	NY 10021 SENATE JULY QUARTERLY 7JUN88	PRIMARY	1,000

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KRAVIS, HENRY R CRANSTON FOR PRESIDENT COMMITTEE INC 87FEC/476/5484 0126687	CONTRIBUTION	NEW YORK KOHLBERT, KRAVIS, ROBERTS & CO	NY 10021 OCTOBER QUARTERLY 24JUL87	PRESIDENTIAL PRIMARY	1,000
KRAVIS, RAYMOND FRIENDS OF JIM INHOFE 88HSE/347/2919 0322815	CONTRIBUTION	TULSA FINANCIAL INVESTOR	OK 74103 APRIL QUARTERLY 15MAR88	HOUSE PRIMARY	500
KRAVIS, RAYMOND F GEORGE BUSH FOR PRESIDENT, INC 87FEC/470/0905 0022761	CONTRIBUTION	TULSA SELF-EMPLOYED	OK 74114 APRIL QUARTERLY 12AUG86	PRESIDENTIAL PRIMARY	750
KRAVIS, RAYMOND F PETE DU PONT FOR PRESIDENT 87FEC/470/0653 0029670	CONTRIBUTION	TULSA OIL & GAS INVES	OK 74103 APRIL QUARTERLY 16MAR87	PRESIDENTIAL PRIMARY	1,000
KRAVIS, RAYMOND F FOR PRESIDENT COMMITTEE INC 87FEC/475/0813 0056884	CONTRIBUTION	TULSA SELF EMPLOYED	OK 74114 JULY QUARTERLY 29MAY87	PRESIDENTIAL PRIMARY	1,000
KRAVIS, RAYMOND F GEORGE BUSH FOR PRESIDENT INC COMPLIANCE 87FEC/488/4605 0125644	CONTRIBUTION REF TO INDIVIDUAL	PALM BEACH	FL 33480 OCTOBER QUARTERLY 17AUG87	PRESIDENTIAL GENERAL	250
KRAVIS, RAYMOND F METZENBAUM FOR SENATE- 88 88SEN/007/4175 0301787	CONTRIBUTION	TULSA INVESTOR	OK 74114 APRIL QUARTERLY 11MAR88	SENATE PRIMARY	1,000
KRAVIS, RAYMOND F METZENBAUM FOR SENATE- 88 88SEN/007/4175 0301788	CONTRIBUTION	TULSA INVESTOR	OK 74114 APRIL QUARTERLY 11MAR88	SENATE GENERAL	1,000
KRAVIS, RAYMOND F COMMITTEE TO ELECT HARRY A JOHNSTON II TO CONGRESS 88HSE/346/4257 0330083	CONTRIBUTION	PALM BEACH	FL 33480 APRIL QUARTERLY 25MAR88	HOUSE PRIMARY	500
KRAVIS, RAYMOND F/PEOPLE FOR JOHN HEINZ COMMITTEE NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS * 88SEN/010/4772 0412739	EARMARKED INTERMEDIARY OUT		PARTY QUALIFIED JULY QUARTERLY 20APR88	PRIMARY	1,000
KRAVIS, RAYMOND F/FRIENDS OF CONNIE MACK NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS * 88SEN/010/4793 0412834	EARMARKED INTERMEDIARY OUT		PARTY QUALIFIED JULY QUARTERLY 31MAY88	PRIMARY	1,000
KRAVIS, RAYMOND F/DURENBERGER FOR U S SENATE VOLUNTEER COM NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS * 88SEN/010/4794 0412835	EARMARKED INTERMEDIARY OUT		PARTY QUALIFIED JULY QUARTERLY 31MAY88	PRIMARY	1,000

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CRAVIS, HENRY R CRANSTON FOR PRESIDENT COMMITTEE INC 87FEC/476/5484 8120687 CONTRIBUTION	NEW YORK	KIRKLAND, KRAVIS, ROBERTS & CO	NY 10021 PRESIDENTIAL OCTOBER QUARTERLY 24JUL87	PRIMARY	1,000
CRAVIS, RAYMOND FRIENDS OF JIM INHOFE 88HSE/347/2919 8322815 CONTRIBUTION	TULSA	FINANCIAL INVESTOR	OK 74103 HOUSE APRIL QUARTERLY 15MAR88	PRIMARY	500
CRAVIS, RAYMOND F GEORGE BUSH FOR PRESIDENT, INC 87FEC/470/0905 8022761 CONTRIBUTION	TULSA	SELF-EMPLOYED	OK 74114 PRESIDENTIAL APRIL QUARTERLY 12JUL88A	PRIMARY	750
CRAVIS, RAYMOND F PETE DU PONT FOR PRESIDENT 87FEC/470/0653 8029670 CONTRIBUTION	TULSA	OIL & GAS INVES	OK 74103 PRESIDENTIAL APRIL QUARTERLY 16MAR87	PRIMARY	1,000
CRAVIS, RAYMOND F FOR PRESIDENT COMMITTEE INC 87FEC/475/0813 8054884 CONTRIBUTION	TULSA	SELF EMPLOYED	OK 74114 PRESIDENTIAL JULY QUARTERLY 29MAY87	PRIMARY	1,000
CRAVIS, RAYMOND F GEORGE BUSH FOR PRESIDENT INC COMPLIANCE 87FEC/488/4605 8125644 CONTRIBUTION REF TO INDIVIDUAL	PALM BEACH		FL 33480 PRESIDENTIAL OCTOBER QUARTERLY 17AUG87	GENERAL	250
CRAVIS, RAYMOND F METZENBAUM FOR SENATE- 88 88SEN/007/4175 8301787 CONTRIBUTION	TULSA	INVESTOR	OK 74114 SENATE APRIL QUARTERLY 11MAR88	PRIMARY	1,000
CRAVIS, RAYMOND F METZENBAUM FOR SENATE- 88 88SEN/007/4175 8301788 CONTRIBUTION	TULSA	INVESTOR	OK 74114 SENATE APRIL QUARTERLY 11MAR88	GENERAL	1,000
CRAVIS, RAYMOND F COMMITTEE TO ELECT HARRY A JOHNSTON II TO CONGRESS 88HSE/346/4257 8308063 CONTRIBUTION	PALM BEACH		FL 33480 HOUSE APRIL QUARTERLY 29MAR88	PRIMARY	500
CRAVIS, RAYMOND F/PEOPLE FOR JOHN HEINZ COMMITTEE NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS T 88SEN/010/4772 8412739 EARMARKED INTERMEDIARY OUT			PARTY QUALIFIED JULY QUARTERLY 20APR88	PRIMARY	1,000
CRAVIS, RAYMOND F/FRIENDS OF CONNIE MACK NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS T 88SEN/010/4793 8412834 EARMARKED INTERMEDIARY OUT			PARTY QUALIFIED JULY QUARTERLY 31MAY88	PRIMARY	1,000
CRAVIS, RAYMOND F/DURENBERGER FOR U S SENATE VOLUNTEER COM NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS T 88SEN/010/4794 8412832 EARMARKED INTERMEDIARY OUT			PARTY QUALIFIED JULY QUARTERLY 31MAY88	PRIMARY	1,000

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KRAVIS, RAYMOND F/FRIENDS FOR SLADE GORTON 1988 NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS * 88SEN/010/4803 8412804 EARMARKED INTERMEDIARY OUT				PARTY QUALIFIED JULY QUARTERLY 9JUN88	PRIMARY	1,000
KRAVIS, RAYMOND F/SENATOR CHAFEE COMMITTEE NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS * 88SEN/010/4804 8412885 EARMARKED INTERMEDIARY OUT				PARTY QUALIFIED JULY QUARTERLY 9JUN88	PRIMARY	1,000
KRAVIS, RAYMOND F/FRIENDS OF DICK LUGAR NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS * 88SEN/010/4804 8412886 EARMARKED INTERMEDIARY OUT				PARTY QUALIFIED JULY QUARTERLY 9JUN88	PRIMARY	1,000
KRAVIS, RAYMOND F DUPENBERGER FOR U S SENATE VOLUNTEER COMMITTEE 88SEN/013/2207 8425485 CONTRIBUTION	TULSA CONDUIT MRSC	OK 74103		SENATE JULY QUARTERLY 10JUN88	PRIMARY	1,000
IS, RAYMOND F -:PLE FOR JOHN HEINZ COMMITTEE 88SEN/011/2359 8438083 CONTRIBUTION	TULSA OIL & GAS INVESTMENT	OK 74103		SENATE JULY QUARTERLY 25APR88	PRIMARY	1,000
KRAVIS, RAYMOND F SENATOR CHAFEE COMMITTEE 88SEN/012/0637 8453219 CONTRIBUTION	TULSA OIL INVESTOR	OK 74102		SENATE JULY QUARTERLY 15JUN88	PRIMARY	1,000
KRAVIS, RAYMOND F/NATIONAL REPUBLICAN SENATORIAL COMMITTEE FRIENDS OF CONNIE MACK 88SEN/011/2126 8456706 EARMARKED CONTRIBUTION				SENATE JULY QUARTERLY 7JUN88	PRIMARY	1,000
KRAVIS, RAYMOND F MR REPUBLICAN CONGRESSIONAL BOOSTERS CLUB 87FEC/465/2270 8018776 CONTRIBUTION	PALM BEACH OIL & GAS PRODUCER	FL 33480		NON-PARTY QUALIFIED APRIL MONTHLY 4MAR87	PRIMARY	500
KRAVIS, RAYMOND F MR JACK KEMP FOR PRESIDENT 87FEC/475/3376 8044164 CONTRIBUTION	PALM BEACH	FL 33480		PRESIDENTIAL JULY QUARTERLY 4MAR87	PRIMARY	1,000
KRAVIS, RAYMOND F MR NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS * 87SEN/006/0423 8075379 CONTRIBUTION	TULSA OIL & GAS INVESTMENTS	OK 74103		PARTY QUALIFIED MID-YEAR REPORT 9JUL87	PRIMARY	10,000
KRAVIS, RAYMOND F MR OKLAHOMANS FOR BOREN 87SEN/007/0938 8139517 CONTRIBUTION	TULSA RAYMOND F KRAVIS AND ASSOC	OK 74114		SENATE MID-YEAR REPORT 16APR87	PRIMARY	1,000
KRAVIS, RAYMOND F MR REPUBLICAN NATIONAL COMMITTEE - CONTRIBUTIONS (AKA REPUBLICAN NATIONAL FINANCE COMMITTEE 88FEC/501/4352 8175676 CONTRIBUTION	TULSA OWNER	OK 74103		PARTY QUALIFIED YEAR-END 16NOV87	PRIMARY	10,000

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KRAVIS, RAYMOND F MR REPUBLICAN CONGRESSIONAL BOOSTERS CLUB 88FEC/523/0731 8310043 CONTRIBUTION		PALM BEACH RETIRED	FL 33480	NON-PARTY QUALIFIED APRIL MONTHLY 4MAR88	PRIMARY	750
KRAVIS, RAYMOND F MR BEPHARDT FOR PRESIDENT COMMITTEE INC 88FEC/522/0084 8312586 CONTRIBUTION		TULSA	OK 74103	PRESIDENTIAL APRIL MONTHLY 4MAR88	PRIMARY	500
KRAVIS, RAYMOND F MR REPUBLICAN NATIONAL COMMITTEE - CONTRIBUTIONS (AKA REPUBLICAN NATIONAL FINANCE COMMITTEE 88FEC/534/3944 8402423 CONTRIBUTION		TULSA OWNER	OK 74103	PARTY QUALIFIED JULY QUARTERLY 22JUN88	PRIMARY	10,000
KRAVIS, RAYMOND F MR NATIONAL REPUBLICAN SENATORIAL COMMITTEE - CONTRIBUTIONS (88SEN/010/4136 8409861 CONTRIBUTION		TULSA OIL & GAS INVESTMENTS	OK 74103	PARTY QUALIFIED JULY QUARTERLY 8JUN88	PRIMARY	4,000
S, RAYMOND F MR FRIENDS OF DICK LUGAR 88SEN/011/0660 8420495 CONTRIBUTION		TULSA INVESTOR	OK 74103	SENATE JULY QUARTERLY 14JUN88	GENERAL	1,000
KRAVIS, RAYMOND F MR FRIENDS OF PHIL GRAMM 88SEN/014/1947 8443379 CONTRIBUTION		TULSA	OK 74103	SENATE MID-YEAR REPORT 8JUL88	PRIMARY	500
KRAVIS, RAYMOND F MR FRIENDS FOR SLADE GORTON 1988 88SEN/012/2450 8435945 CONTRIBUTION		TULSA SELF-EMPL MUSIC EARNWRKER	OK 74103	SENATE JULY QUARTERLY 13JUN88	PRIMARY	1,000
KRAVIS, RAYMOND F MRS REPUBLICAN CONGRESSIONAL BOOSTERS CLUB 87FEC/465/2270 8018778 CONTRIBUTION		PALM BEACH OIL & GAS PRODUCER	FL 33480	NON-PARTY QUALIFIED APRIL MONTHLY 4MAR87	PRIMARY	500
KRAVIS, RAYMOND F MRS REPUBLICAN CONGRESSIONAL BOOSTERS CLUB 88FEC/523/0731 8310044 CONTRIBUTION		PALM BEACH RETIRED	FL 33480	NON-PARTY QUALIFIED APRIL MONTHLY 4MAR88	PRIMARY	750
ROEHM KRAVIS, CAROLYNE MS REPUBLICAN NATIONAL COMMITTEE - CONTRIBUTIONS (AKA REPUBLICAN NATIONAL FINANCE COMMITTEE 88FEC/534/4078 8402933 CONTRIBUTION		NEW YORK FASHION DESIGNER	NY 10021	PARTY QUALIFIED JULY QUARTERLY 30JUN88	PRIMARY	10,000

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PERELMAN, RONALD REVNIHAN COMMITTEE INC 87SEN/008/3442 0137967 CONTRIBUTION		NEW YORK REVLON	NY 10021 SENATE MID-YEAR REPORT 29JAN87	PRIMARY	1,000
PERELMAN, RONALD REVNIHAN COMMITTEE INC 87SEN/008/3442 0137968 CONTRIBUTION		NEW YORK REVLON	NY 10021 SENATE MID-YEAR REPORT 29JAN87	GENERAL	1,000
PERELMAN, RONALD TOM LANTOS FOR CONGRESS COMMITTEE 87HSE/335/1168 0157142 CONTRIBUTION		NEW YORK EXECUTIVE	NY 10021 HOUSE MID-YEAR REPORT 7APR87	PRIMARY	1,000
PERELMAN, RONALD COMMITTEE FOR DAN GIBBONS 88HSE/339/4806 0271234 CONTRIBUTION		NEW YORK CONSOLIDATED CIGAR	NY 10021 HOUSE YEAR-END 17JUL87	PRIMARY	1,000
PERELMAN, RONALD O METZENBAUM FOR SENATE- 88 87SEN/007/0795 0142969 CONTRIBUTION		NEW YORK	NY 10021 SENATE MID-YEAR REPORT 16JUN87	PRIMARY	1,000
PERELMAN, RONALD O COMMITTEE FOR CONGRESSMAN BILL GREEN 87HSE/335/4679 0151180 CONTRIBUTION		NEW YORK MAC ANDREWS & FORBES GROUP	NY 10021 HOUSE MID-YEAR REPORT 13FEB87	FOR 1986	1,000
PERELMAN, RONALD O COMMITTEE FOR CONGRESSMAN BILL GREEN 87HSE/335/4679 0151181 CONTRIBUTION		NEW YORK MAC ANDREWS & FORBES GROUP	NY 10021 HOUSE MID-YEAR REPORT 9MAR87	FOR 1986	1,000
PERELMAN, RONALD O BILL BRADLEY FOR U S SENATE '90 87SEN/008/2675 0162322 CONTRIBUTION		NEW YORK REVLON GROUP	NY 10021 SENATE MID-YEAR REPORT 13FEB87	PRIMARY	1,000
PERELMAN, RONALD O BILL BRADLEY FOR U S SENATE '90 87SEN/008/2675 0162323 CONTRIBUTION		NEW YORK REVLON GROUP	NY 10021 SENATE MID-YEAR REPORT 13FEB87	GENERAL	1,000
PERELMAN, RONALD O PETE DAWKINS FOR SENATE 88SEN/008/1509 0320240 CONTRIBUTION		NEW YORK REVLON GROUP INC	NY 10021 SENATE APRIL QUARTERLY 9FEB88	PRIMARY	1,000
PERELMAN, RONALD O PETE DAWKINS FOR SENATE 88SEN/008/1509 0320241 CONTRIBUTION		NEW YORK REVLON GROUP INC	NY 10021 SENATE APRIL QUARTERLY 9FEB88	GENERAL	500
PERELMAN, RONALD O DEMOCRATIC SENATORIAL CAMPAIGN COMMITTEE 88SEN/009/2921 0348752 CONTRIBUTION		NEW YORK REVLON GROUP INC	NY 10021 PARTY QUALIFIED MAY MONTHLY 22MAY88	PRIMARY	10,000

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PERELMAN, RONALD O MCCARTHY FOR U S SENATOR 88SEN/011/1948 0427434 CONTRIBUTION		NEW YORK MC ANDREWS & FORBES	NY 10021	SENATE JULY QUARTERLY 23MAY88	PRIMARY	1,000
PERELMAN, RONALD O LICHT '88 COMMITTEE 88SEN/012/0788 0428039 CONTRIBUTION		NEW YORK MCANDREWS & FORBES	NY 10021	SENATE JULY QUARTERLY 29APR88	PRIMARY	1,000
PERELMAN, RONALD O CITIZENS FOR ARLEN SPECTER 88SEN/013/2244 0462301 CONTRIBUTION		NEW YORK MCANDREW & FORBES	NY 10021	SENATE MID-YEAR REPORT 16MAY88	PRIMARY	1,000
PERELMAN, RONALD O DUKAKIS FOR PRESIDENT COMMITYEE COMPLIANCE FUND 88FEC/571/2915 0682458 CONTRIBUTION		NEW YORK REVLON INC	NY 10021	PRESIDENTIAL YEAR-END 08DEC88	GENERAL	1,000
PERELMAN, RONALD O MR BIDEN FOR PRESIDENT 87FEC/476/0736 0044844 CONTRIBUTION		NEW YORK MCANDREWS & FORBES GROUP INC	NY 10021	PRESIDENTIAL JULY QUARTERLY 25JUN87	PRIMARY	1,000
PERELMAN, RONALD O MR FRIENDS OF GARY HART-1988 INC 87FEC/476/0317 0059253 CONTRIBUTION		NEW YORK	NY 10021	PRESIDENTIAL JULY QUARTERLY 6MAY87	PRIMARY	1,000
PERELMAN, RONALD O MR GEORGE BUSH FOR PRESIDENT, INC 88FEC/505/1507 0186111 CONTRIBUTION		NEW YORK	NY 10021	PRESIDENTIAL YEAR-END 27OCT87	PRIMARY	500
PERELMAN, RONALD O MR GEPHARDT FOR PRESIDENT COMMITTEE INC 88FEC/506/2336 0189431 CONTRIBUTION		NEW YORK	NY 10021	PRESIDENTIAL YEAR-END 28DEC87	PRIMARY	1,000
PERELMAN, RONALD O MR DOLE FOR PRESIDENT COMMITTEE INC 88FEC/490/0877 0194634 CONTRIBUTION		NEW YORK	NY 10021	PRESIDENTIAL YEAR-END 28DEC87	PRIMARY	500
PERELMAN, RONALD O MR ALBERT GORE JR FOR PRESIDENT COMMITTEE INC 88FEC/527/1785 0344243 CONTRIBUTION		NEW YORK	NY 10021	PRESIDENTIAL MAY MONTHLY 22APR88	PRIMARY	1,000
PERELMAN, RONALD O MR REPUBLICAN NATIONAL COMMITTEE - CONTRIBUTIONS (AKA REPUBLICAN NATIONAL FINANCE COMMITTEE 88FEC/534/4042 0402800 CONTRIBUTION		NEW YORK CITY MCANDREWS & FORBES	NY 10153	PARTY QUALIFIED JULY QUARTERLY 30JUN88	PRIMARY	5,000
PERELMAN, RONALD O MR CALIFORNIANS FOR PETE WILSON 1994 88SEN/011/1157 0417463 CONTRIBUTION		NEW YORK REVLON INC	NY 10021	SENATE JULY QUARTERLY 27JUN88	GENERAL	1,000

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CONTRIBUTOR/LENDER/TRANSFERER REPORTING ENTITY MICROFILM LOCATION	STREET ADDRESS TRANSACTION TYPE	CITY	STATE ZIP REPORT TYPE DATE	TYPE OF FILER ELECTION	AMOUNT
PERELMAN, RONALD O MR RIEGLE FOR SENATE IN '88 COMMITTEE 386EN/012/2285	0420685 CONTRIBUTION	NEW YORK MACANDREWS & FORBES	NY 10021 SENATE JULY QUARTERLY 90AY88	PRIMARY	1,000

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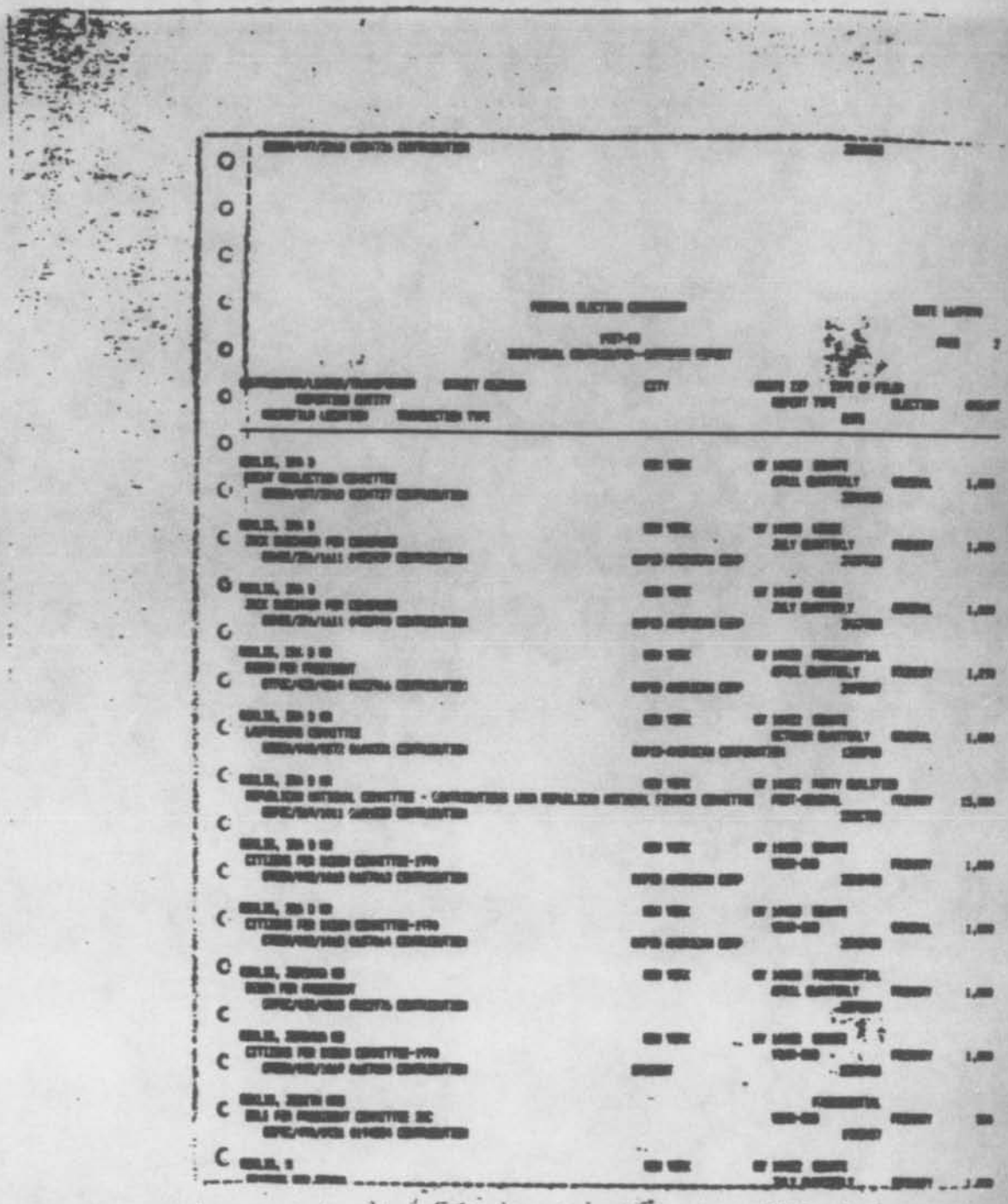
Attachment 6



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88FEC/527/1639 0343809 CONTRIBUTION	BARRY UNIVERSITY	4WYBB		
ANDREAS, D DREZ MRS				
DEMOCRATIC SENATORIAL CAMPAIGN COMMITTEE	MIAMI BEACH	FL 33154 PARTY QUALIFIED		
88BBV/010/1101 0346244 CONTRIBUTION	HOUSEWIFE	JUNE MONTHLY 24WY88	PRIMARY	1,000

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CONTRIBUTOR/LENDER/TRANSFERROR REPORTING ENTITY MICROFILM LOCATION	STREET ADDRESS TRANSACTION TYPE	CITY	STATE ZIP REPORT TYPE DATE	TYPE OF FILER ELECTION	AMOUNT
ANDREAS, D DREZ MRS					
ABCEN FOR US SENATE		MIAMI BEACH	FL 33154 SENATE		
88BBV/007/2434 0274384 CONTRIBUTION		HOUSEWIFE	APRIL QUARTERLY 12FEB88	PRIMARY	1,000
ANDREAS, D DREZ MRS					
REPUBLICAN NATIONAL COMMITTEE - CONTRIBUTIONS (AKA REPUBLICAN NATIONAL FINANCE COMMITTEE		MIAMI BEACH	FL 33154 PARTY QUALIFIED		
88FEC/534/3695 0401517 CONTRIBUTION		HOUSEWIFE	JULY QUARTERLY 13JUN88	PRIMARY	5,000
ANDREAS, D DREZ MRS					
ABCEN FOR US SENATE		MIAMI BEACH	FL 33154 SENATE		
88BBV/011/2600 0445792 CONTRIBUTION REF TO INDIVIDUAL			JULY QUARTERLY 20JUN88	PRIMARY	320-
ANDREAS, D DREZ MRS					
MAJORITY CONGRESS COMMITTEE		BAL HARBOUR	FL 33154 NON-PARTY QUALIFIED		
88NGE/352/1320 0443245 MEMO(FILER'S I OF CONTRB GIVEN TO JT FR)		HOUSEWIFE	APRIL MONTHLY 7DEC87	PRIMARY	750 AMENDMENT
ANDREAS, D DREZ MRS					
CAMPAIGN AMERICA		MIAMI BEACH	FL 33154 NON-PARTY QUALIFIED		
88FEC/361/4579 0384727 CONTRIBUTION			PRE-GENERAL 7OCT88	PRIMARY	1,000
ANDREAS, D MRS					
JESSE JACKSON FOR PRESIDENT '88 COMMITTEE		MIAMI SHORES	FL 33161 PRESIDENTIAL		
88FEC/527/3469 0346384 CONTRIBUTION			MAY MONTHLY 1APR88	PRIMARY	1,000
ANDREAS, D MRS					
JESSE JACKSON FOR PRESIDENT '88 COMMITTEE		MIAMI SHORES	FL 33161 PRESIDENTIAL		
88FEC/527/3469 0346385 CONTRIBUTION			MAY MONTHLY 1APR88	PRIMARY	1,000
ANDREAS, D O					
HATCH ELECTION COMMITTEE		DECATUR	IL 62525 SENATE		
87BBV/009/1233 0141225 CONTRIBUTION		ARCHER DANIELS	MID-YEAR REPORT 15JUL87	PRIMARY	1,000
ANDREAS, D O					
KIKA DE LA GARZA FOR CONGRESS		DECATUR	IL 62525 HOUSE		
87HGE/334/2865 0156635 CONTRIBUTION		BUSINESS EXEC	MID-YEAR REPORT 30JUL87	GENERAL	1,000
ANDREAS, D O					
BURDICK CAMPAIGN COMMITTEE		MIAMI BEACH	FL 33154 SENATE		
88BBV/005/2280 0240769 CONTRIBUTION		ARCHER DANIELS MIDLAND COMPANY	YEAR-END 24DEC87	PRIMARY	1,000
ANDREAS, D O					
[illegible]		DECATUR	IL 62525 NON-PARTY QUALIFIED		

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88HGE/344/1411 0240073 CONTRIBUTION	ARCHER DANIELS MIDLAND		70EC87		1,000
ANDREAS, D O	BAL HARBOUR .	FL 33154 HOUSE			
BOWKER FOR CONGRESS COMMITTEE			YEAR-END	PRIMARY	1,000
88HGE/343/0735 0271498 CONTRIBUTION	ARCHER DANIELS MIDLAND COMPANY		17DEC87		

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CONTRIBUTOR/LENDER/TRANSFERROR / REPORTING ENTITY / MICROFILM LOCATION / TRANSACTION TYPE	STREET ADDRESS	CITY	STATE ZIP	TYPE OF FILER / REPORT TYPE / DATE	ELECTION	AMOUNT
ANDREAS, D O		MIAMI BEACH	FL 33154	SENATE		
FRIENDS OF SENATOR DAVID KARNES				YEAR-END	PRIMARY	1,000
88SEN/006/1345 0279112 CONTRIBUTION		ARCHER DANIEL MIDLAND CO		15DEC87		AMENDMENT
ANDREAS, D O		DECATUR	IL 62525	NON-PARTY QUALIFIED		
COMMITTEE FOR DEMOCRATIC OPPORTUNITY				JULY QUARTERLY	PRIMARY	1,000
88FEC/538/5225 0434095 CONTRIBUTION		ARCHER DANIELS MIDLAND CO		28APR88		
ANDREAS, D O		DECATUR	IL 62525	NON-PARTY QUALIFIED		
MAJORITY CONGRESS COMMITTEE				APRIL MONTHLY	PRIMARY	750
88HGE/352/1332 0463244 MEMO(FILER'S T OF CONTRB GIVEN TO JT FR)		ARCHER DANIELS MIDLAND		25DEC87		AMENDMENT
ANDREAS, D O		MIAMI BEACH	FL 33154	HOUSE		
MICHEL FOR CONGRESS COMMITTEE				OCTOBER QUARTERLY	GENERAL	1,000
88HGE/361/3486 0508331 CONTRIBUTION		ARCHER DANIELS MIDLAND CO		5AUG88		
ANDREAS, D O		MIAMI BEACH	FL 33154	HOUSE		
MICHEL FOR CONGRESS COMMITTEE				POST-GENERAL	GENERAL	1,000
88HGE/370/1506 0663910 CONTRIBUTION		MEMEMAKER		16NOV88		
ANDREAS, D O MR		MIAMI BEACH	FL 33154	PRESIDENTIAL		
PAUL SIMON FOR PRESIDENT				JULY QUARTERLY	PRIMARY	1,000
87FEC/475/0181 0041754 CONTRIBUTION		ARCHER DANIELS MIDLAND		23JUN87		
ANDREAS, DAVID		MINNEAPOLIS	MN 55416	SENATE		
HUMPHREY FOR SENATE CAMPAIGN COMMITTEE INC				JULY QUARTERLY	PRIMARY	700
88SEN/010/2424 0418540 CONTRIBUTION		NATIONAL CITY BANK		27MAY88		
ANDREAS, DAVID		MINNEAPOLIS	MN 55416	SENATE		
HUMPHREY FOR SENATE CAMPAIGN COMMITTEE INC				POST-GENERAL	GENERAL	700
88SEN/025/0773 0638573 CONTRIBUTION		NATL CITY BANK		4NOV88		
ANDREAS, DAVID L MR		MINNEAPOLIS	MN 55416	PRESIDENTIAL		
JESSE JACKSON FOR PRESIDENT '88 COMITTEE				JULY MONTHLY	PRIMARY	500
89FEC/612/1381 0703502 CONTRIBUTION		NATIONAL CITY BANCORPORATION		18JAN88		AMENDMENT
ANDREAS, DEBRA		MINNEAPOLIS	MN 55416	SENATE		
HUMPHREY FOR SENATE CAMPAIGN COMMITTEE INC				JULY QUARTERLY	PRIMARY	1,000
88SEN/010/2424 0418541 CONTRIBUTION		MEMEMAKER		31MAY88		
ANDREAS, DEBRA		MINNEAPOLIS	MN 55416	SENATE		

[illegible] 700-
[illegible]/025/0773 0638572 CONTRIBUTION [illegible] 4JUN90

ANDREAS, DEBRA [illegible] MINNEAPOLIS MN 55416 SENATE
[illegible] FOR SENATE CAMPAIGN COMITTEE INC PRE-GENERAL GENERAL 1,700
[illegible]/021/0556 0640491 CONTRIBUTION [illegible] 4OCT90

CONTRIBUTOR/LENDER/TRANSFERRER STREET ADDRESS CITY STATE ZIP TYPE OF FILER
REPORTING ENTITY REPORT TYPE ELECTION AMOUNT
MICROFILM LOCATION TRANSACTION TYPE DATE

ANDREAS, DWAYNE STATE BEACH FL 33154 SENATE
RIEGLE FOR SENATE IN '88 COMMITTEE MID-YEAR REPORT PRIMARY 1,000
87SEN/007/1986 0135625 CONTRIBUTION ARCHER DANIELS MIDLAND COMPANY 23APR87

ANDREAS, DWAYNE DECATUR IL 62525 MIDDLE
DWAYNE D FASCELL CAMPAIGN COMMITTEE YEAR-END PRIMARY 1,000
88HSE/339/4832 0253773 CONTRIBUTION ARCHER DANIELS MIDLA 21DEC87

ANDREAS, DWAYNE DECATUR IL 62525 SENATE
METZENBAUM FOR SENATE- 88 JULY QUARTERLY GENERAL 1,000
88SEN/010/2653 0418178 CONTRIBUTION ARCHER DANIELS MIDLAND 7JUL88

ANDREAS, DWAYNE MR MIAMI BEACH FL 33154 SENATE
ADAIR FOR US SENATE JULY QUARTERLY PRIMARY 320-
88SEN/011/3706 0447222 CONTRIBUTION REF TO INDIVIDUAL 20JUL88

ANDREAS, DWAYNE D DECATUR IL 62526 PRESIDENTIAL
KENDALE/FERRARO COMMITTEE INC/LEGAL AND ACCOUNTING COMPLIANCE FUND APRIL QUARTERLY GENERAL 1,000
87FEC/285/3370 0004981 CONTRIBUTION ARCHER DANIELS MIDLAND CO 4FEB87

ANDREAS, DWAYNE D MIAMI BEACH FL 33154 PRESIDENTIAL
[illegible] FOR PRESIDENT COMMITTEE INC APRIL QUARTERLY PRIMARY 1,000
87FEC/425/5208 0017048 CONTRIBUTION ARCHER DANIELS MIDLAND CO 20FEB87

ANDREAS, DWAYNE D BAL HARBOUR FL 33154 SENATE
[illegible] FOR U S SENATE VOLUNTEER COMMITTEE MID-YEAR REPORT PRIMARY 1,000
87SEN/008/2382 0133040 CONTRIBUTION 17JUL87

ANDREAS, DWAYNE D BAL HARBOUR FL 33154 SENATE
HELCHER FOR SENATE COMMITTEE MID-YEAR REPORT PRIMARY 1,000
87SEN/008/2517 0134348 CONTRIBUTION ARCHER DANIELS MIDLAND CO 6JUL87

ANDREAS, DWAYNE D DECATUR IL 62525 SENATE
HECHT REELECTION COMMITTEE YEAR-END PRIMARY 1,000
88SEN/001/2625 0250798 CONTRIBUTION ARCHER DANIELS MIDLAND COMPANY 17FEB87

ANDREAS, DWAYNE D DECATUR IL 62525 PRESIDENTIAL
[illegible] FOR PRESIDENT COMMITTEE, INC JUNE MONTHLY PRIMARY 1,000
88FEC/531/0002 0264187 CONTRIBUTION ARCHER DANIELS MIDLAND CO 22JUL88

ANDREAS, DWAYNE D MIAMI BEACH FL 33154 SENATE

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[illegible] FOR US SENATE				APRIL QUARTERLY	PRIMARY	1,000
88SEN/007/2434 0374382 CONTRIBUTION				12FEB88		
ANDREAS, DWAYNE O		MIAMI BEACH	FL 33154	SENATE		
GRAY FOR U S SENATOR COMMITTEE				JULY QUARTERLY	PRIMARY	1,000
88SEN/012/1143 0429731 CONTRIBUTION		ARCHER DANIELS MIDLAND		14APR88		

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CONTRIBUTOR/LENDER/TRANSFERRER / REPORTING ENTITY / MICROFILM LOCATION / TRANSACTION TYPE	STREET ADDRESS	CITY	STATE ZIP	TYPE OF FILER / REPORT TYPE / DATE	ELECTION	AMOUNT
ANDREAS, DWAYNE O		MIAMI BEACH	FL 33154	SENATE		
FRIENDS OF CONNIE MACK				JULY QUARTERLY	PRIMARY	1,000
88SEN/011/2192 0456958 CONTRIBUTION		ARCHER DANIELS		22APR88		
ANDREAS, DWAYNE O		BAL HARBOR	FL 33154	SENATE		
EURENBERGER FOR U S SENATE VOLUNTEER COMMITTEE				POST-GENERAL	GENERAL	1,000
88SEN/025/0588 0627908 CONTRIBUTION		EXECUTIVE		19NOV88		
ANDREAS, DWAYNE O		MIAMI BEACH	FL 33154	SENATE		
FRIENDS OF CONNIE MACK				POST-GENERAL	GENERAL	1,000
88SEN/026/1246 0647698 CONTRIBUTION		ARCHER DANIELS		28OCT88		
ANDREAS, DWAYNE O MR		MIAMI BEACH	FL 33154	SENATE		
FRIENDS OF ROBERT C BYRD COMMITTEE				MID-YEAR REPORT	PRIMARY	1,000
87SEN/009/0823 0147456 CONTRIBUTION		ARCHER-DANIELS-MIDLAND		17FEB87		
ANDREAS, DWAYNE O MR		MIAMI BEACH	FL 33154	SENATE		
MCCONNELL SENATE COMMITTEE '90				MID-YEAR REPORT	PRIMARY	1,000
87SEN/007/0021 0148046 CONTRIBUTION		ARCHER DANIELS MIDLAND CO		15MAY87		
ANDREAS, DWAYNE O MR		DECATUR	IL 62525	SENATE		
SENATOR LLOYD BENTSEN ELECTION COMMITTEE				YEAR-END	PRIMARY	1,000
88SEN/004/1248 0240879 CONTRIBUTION		ARCHER DANIELS MIDLA		4MAR87		
ANDREAS, DWAYNE O MR		DECATUR	IL 62525	SENATE		
FRIENDS OF DICK LUGAR				APRIL QUARTERLY	PRIMARY	1,000
88SEN/006/2301 0301540 CONTRIBUTION				22MAR88		
ANDREAS, DWAYNE O MR		MIAMI BEACH	FL 33154	HOUSE		
COMMITTEE FOR SAM GIBBONS				APRIL QUARTERLY	PRIMARY	1,000
88HSE/344/4340 0333342 CONTRIBUTION		ARCHER DANIELS		16MAR88		
ANDREAS, DWAYNE O MR		MIAMI BEACH	FL 33154	PRESIDENTIAL		
ALBERT GORE JR FOR PRESIDENT COMMITTEE INC				MAY MONTHLY	PRIMARY	1,000
88PEC/527/1640 0343840 CONTRIBUTION				6APR88		
ANDREAS, DWAYNE O MR		BAL HARBOUR	FL 33154	PARTY QUALIFIED		
DEMOCRATIC SENATORIAL CAMPAIGN COMMITTEE				JUNE MONTHLY	PRIMARY	1,000
88SEN/010/1102 0348245 CONTRIBUTION		ARCHER DANIELS MIDLAND		24MAY88		
ANDREAS, DWAYNE O MR		DECATUR	IL 62525	PARTY QUALIFIED		

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REPUBLICAN NATIONAL COMMITTEE - CONTRIBUTIONS (AKA REPUBLICAN NATIONAL FINANCE COMMITTEE				JULY QUARTERLY	PRIMARY	5,000
C00FEC/534/3696 0401518 CONTRIBUTION	ARCHER-DANIELS-MIDLAND			13JUL88		
ANDREAS, DWAYNE O MRS	MIAMI BEACH	FL	33132	SENATE		
SENATOR LLOYD BENTSEN ELECTION COMMITTEE				YEAR-END	PRIMARY	1,000
C00SEN/004/1248 0240881 CONTRIBUTION	BARRY UNIVERSITY			490487		

CONTRIBUTOR/LENDER/TRANSFERROR / REPORTING ENTITY / MICROFILM LOCATION / TRANSACTION TYPE	STREET ADDRESS	CITY	STATE	ZIP	TYPE OF FILER / REPORT TYPE / DATE	ELECTION	AMOUNT
ANDREAS, G		PELLA	IA	50219	PRESIDENTIAL		
JESSE JACKSON FOR PRESIDENT '88 COMMITTEE					MAY MONTHLY	PRIMARY	1,000
C00FEC/527/3610 0346512 CONTRIBUTION					23MAY88		
ANDREAS, G A		WAUKATO	NH	56001	PRESIDENTIAL		
DUKAKIS FOR PRESIDENT COMMITTEE, INC					JUNE MONTHLY	PRIMARY	1,000
C00FEC/531/0002 0364180 CONTRIBUTION					23MAY88		
ANDREAS, G A ALLEN JR MR		DECATUR	IL	62526	PARTY QUALIFIED		
REPUBLICAN NATIONAL COMMITTEE - CONTRIBUTIONS (AKA REPUBLICAN NATIONAL FINANCE COMMITTEE					JULY QUARTERLY	PRIMARY	5,000
C00FEC/534/3696 0401519 CONTRIBUTION	ARCHER-DANIELS-MIDLAND				13JUL88		
ANDREAS, G A JR MR		DECATUR	IL	62526	PRESIDENTIAL		
PAUL SIMON FOR PRESIDENT					OCTOBER QUARTERLY	PRIMARY	1,000
C77FEC/488/2211 0107414 CONTRIBUTION	ARCHER DANIELS MIDLAND COMPAN				19NOV87		
ANDREAS, G A MR		WAUKATO	NH	56001	PRESIDENTIAL		
PAUL SIMON FOR PRESIDENT					OCTOBER QUARTERLY	PRIMARY	1,000
C77FEC/488/2210 0107412 CONTRIBUTION	G ALLEN ANDREAS AND COMPANY				14DEC87		
ANDREAS, G A MR		PELLA	IA	50219	PRESIDENTIAL		
DOLE FOR PRESIDENT COMMITTEE INC					FEBRUARY MONTHLY	PRIMARY	1,000
C00FEC/306/4329 0208395 CONTRIBUTION					4JAN88		
ANDREAS, G A MR		PELLA	IA	50219	PARTY QUALIFIED		
REPUBLICAN NATIONAL COMMITTEE - CONTRIBUTIONS (AKA REPUBLICAN NATIONAL FINANCE COMMITTEE					JULY QUARTERLY	PRIMARY	5,000
C00FEC/534/3696 0401520 CONTRIBUTION					13JUL88		
ANDREAS, G ALLEN JR		DECATUR	IL	62526	SENATE		
BURDICK CAMPAIGN COMMITTEE					YEAR-END	PRIMARY	1,000
C00SEN/005/2201 0240773 CONTRIBUTION	ARCHER DANIELS MIDLAND COMPANY				18DEC87		
ANDREAS, G ALLEN JR		DECATUR	IL	62526	PRESIDENTIAL		
DUKAKIS FOR PRESIDENT COMMITTEE, INC					JUNE MONTHLY	PRIMARY	1,000
C00FEC/531/0002 0364190 CONTRIBUTION	ARCHER DANIELS MIDLAND CO				23MAY88		
ANDREAS, G ALLEN JR		DECATUR	IL	62526	HOUSE		
MICHEL FOR CONGRESS COMMITTEE					OCTOBER QUARTERLY	GENERAL	500
C00HSE/261/2407 0500334 CONTRIBUTION	ADM				31JUL88		
ANDREAS, G ALLEN JR		DECATUR	IL	62526	HOUSE		

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ANDREAS, ALLEN JR CITIZENS FOR EDWARD R MADIGAN 08HOE/372/4231 0663958 CONTRIBUTION		DECATUR ADM	IL 62526 HOUSE POST-GENERAL 24OCT88	GENERAL	500
ANDREAS, BRENDA L MRS BOLE FOR PRESIDENT COMMITTEE INC 08PEC/306/4329 0268394 CONTRIBUTION		DECATUR	IL 62521 PRESIDENTIAL FEBRUARY MONTHLY 63088	PRIMARY	1,000
ANDREAS, BRENDA L MS PAUL SIMON FOR PRESIDENT 07PEC/488/2210 0107411 CONTRIBUTION		DECATUR ARCHER DANIELS MIDLAND COMPANY CORP	IL 62521 PRESIDENTIAL OCTOBER QUARTERLY 14OCT87	PRIMARY	1,000
ANDREAS, CHARLENE COLORADANS FOR DAVID SKAGGS 08HOE/362/0901 0514528 CONTRIBUTION		BOULDER TRAINER & CONSULTANT	CO 80302 HOUSE OCTOBER QUARTERLY 28SEP88	GENERAL	1,000
ANDREAS, CHARLENE NATIONAL COMMITTEE FOR AN EFFECTIVE CONGRESS 08PEC/373/1432 0651256 CONTRIBUTION		BOULDER PUBLISHER	CO 80302 NON-PARTY QUALIFIED POST-GENERAL 28OCT88	PRIMARY	250
ANDREAS, D : MRS PAUL SIMON FOR PRESIDENT 07PEC/475/0181 0041753 CONTRIBUTION		MIAMI BEACH BARRY UNIV	FL 33154 PRESIDENTIAL JULY QUARTERLY 31JUL87	PRIMARY	1,000
ANDREAS, D DOES MRS BOXER FOR CONGRESS COMMITTEE 08HOE/343/0755 0271459 CONTRIBUTION		BAL HARBOUR HOUSEWIFE	FL 33154 HOUSE YEAR-END 17DEC87	PRIMARY	1,000
ANDREAS, D INEZ BUNDESRAT FOR U S SENATE VOLUNTEER COMMITTEE 07PEN/008/2382 0133359 CONTRIBUTION		BAL HARBOUR	FL 33154 SENATE MID-YEAR REPORT 17JUL87	PRIMARY	1,000
ANDREAS, D INEZ BURDICK CAMPAIGN COMMITTEE 08NDH/005/2280 0240748 CONTRIBUTION		MIAMI BEACH BARRY UNIVERSITY	FL 33154 SENATE YEAR-END 24DEC87	PRIMARY	1,000
ANDREAS, D INEZ WILLIAM LEHMAN CAMPAIGN FUND COMMITTEE 08HOE/347/2000 0341791 CONTRIBUTION		BAL HARBOUR BARRY UNIVERSITY	FL 33154 HOUSE APRIL QUARTERLY 12FEB88	PRIMARY	1,000
ANDREAS, D INEZ BUSKUS FOR PRESIDENT COMMITTEE, INC		MIAMI BEACH	FL 33154 PRESIDENTIAL JUNE MONTHLY	PRIMARY	1,000

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88FEC/331/0082 0364186 CONTRIBUTION	BARRY UNIVERSITY		25NOV88	
ANDREAS, D DREI	MIAMI BEACH	FL 33154 HOUSE		
FRIENDS OF JIM HOOBY		JULY QUARTERLY	PRIMARY	1,000
88REN/013/0981 0442931 CONTRIBUTION	HOUSEWIFE		30JUN88	

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INDIVIDUAL CONTRIBUTOR--DATABASE REPORT

CONTRIBUTOR/LENDER/TRANSFEROR REPORTING ENTITY MICROFILM LOCATION TRANSACTION TYPE	STREET ADDRESS	CITY	STATE ZIP TYPE OF FILER REPORT TYPE DATE	ELECTION	AMOUNT
ANDREAS, D DREI		MIAMI BEACH	FL 33154 SENATE		
FRIENDS OF CONNIE MACK			JULY QUARTERLY	PRIMARY	1,000
88REN/011/2193 0456959 CONTRIBUTION		BARRY UNIVERSITY	22JUL88		
ANDREAS, D DREI		BAL HARBOR	FL 33154 SENATE		
BUSHBERGER FOR U S SENATE VOLUNTEER COMMITTEE			POST-GENERAL	GENERAL	1,000
88REN/025/0388 0627507 CONTRIBUTION			19NOV88		
ANDREAS, D DREI		MIAMI BEACH	FL 33154 HOUSE		
GLICKMAN FOR CONGRESS COMMITTEE			PRE-GENERAL	GENERAL	1,000
88HSE/367/0009 0642781 CONTRIBUTION		HOMEMAKER	26OCT88		
ANDREAS, D DREI		MIAMI BEACH	FL 33154 SENATE		
FRIENDS OF CONNIE MACK			POST-GENERAL	GENERAL	1,000
88REN/026/1246 0647697 CONTRIBUTION		BARRY UNIVERSITY	28OCT88		
ANDREAS, D DREI MRS		MIAMI BEACH	FL 33154 SENATE		
FRIENDS OF ROBERT C BYRD COMMITTEE			MID-YEAR REPORT	PRIMARY	1,000
87REN/009/0065 0147490 CONTRIBUTION		BARRY UNIVERSITY	17FEB87		
ANDREAS, D DREI MRS		DECATUR	IL 62525 HOUSE		
KIKA DE LA GARZA FOR CONGRESS			MID-YEAR REPORT	GENERAL	1,000
87HSE/334/2065 0156634 CONTRIBUTION		CHAIRM BARRY UNIVERSITY	MIAMI SHORE 24JUL87		
ANDREAS, D DREI MRS		BAL HARBOUR	FL 33154 NON-PARTY QUALIFIED		
WRIGHT APPRECIATION FUND			YEAR-END	PRIMARY	1,000
88HSE/344/1412 0240074 CONTRIBUTION		HOUSEWIFE	70DEC87		
ANDREAS, D DREI MRS		MIAMI BEACH	FL 33154 SENATE		
HECHT REELECTION COMMITTEE			YEAR-END	PRIMARY	1,000
88REN/001/2625 0250759 CONTRIBUTION		BARRY UNIVERSITY	17DEC87		
ANDREAS, D DREI MRS		MIAMI BEACH	FL 33154 SENATE		
FRIENDS OF SENATOR DAVID KARNES			YEAR-END	PRIMARY	1,000
88REN/006/1345 0279114 CONTRIBUTION		BARRY UNIVERSITY	15DEC87		AMENDMENT
ANDREAS, D DREI MRS		MIAMI BEACH	FL 33154 HOUSE		
COMMITTEE FOR DAN GIBBONS			APRIL QUARTERLY	PRIMARY	1,000
88HSE/346/4340 0333341 CONTRIBUTION		HOUSEWIFE	16APR88		
ANDREAS, D DREI MRS		MIAMI BEACH	FL 33154 PRESIDENTIAL		
ALBERT GORE JR FOR PRESIDENT COMMITTEE INC			MAY MONTHLY	PRIMARY	1,000

88FEC/527/1639 03438CP CONTRIBUTION	BARRY UNIVERSITY		4APR88	
ANDREAS, D INEZ MRS	MIAMI BEACH	FL 33154	PARTY QUALIFIED	
DEMOCRATIC SENATORIAL CAMPAIGN COMMITTEE			JUNE MONTHLY	PRIMARY 1,000
88SEN/010/1101 03462244 CONTRIBUTION	HOUSEWIFE		24MAY88	

FEDERAL ELECTION COMMISSION DATE 16APR90

1987-88 PAGE 2

INDIVIDUAL CONTRIBUTOR--DATABASE REPORT

CONTRIBUTOR/LENDER/TRANSFERRER / REPORTING ENTITY / MICROFILM LOCATION / TRANSACTION TYPE	STREET ADDRESS	CITY	STATE ZIP	TYPE OF FILER / REPORT TYPE / DATE	ELECTION	AMOUNT
ANDREAS, D INEZ MRS		MIAMI BEACH	FL 33154	SENATE		
ANDREAS FOR US SENATE				APRIL QUARTERLY	PRIMARY	1,000
88SEN/007/2434 03743B4 CONTRIBUTION		HOUSEWIFE		12FEB88		
ANDREAS, D INEZ MRS		MIAMI BEACH	FL 33154	PARTY QUALIFIED		
REPUBLICAN NATIONAL COMMITTEE - CONTRIBUTIONS (AKA REPUBLICAN NATIONAL FINANCE COMMITTEE				JULY QUARTERLY	PRIMARY	5,000
88FEC/534/3695 0401517 CONTRIBUTION		HOUSEWIFE		13JUN88		
ANDREAS, D INEZ MRS		MIAMI BEACH	FL 33154	SENATE		
ANDREAS FOR US SENATE				JULY QUARTERLY	PRIMARY	320-
88SEN/011/2600 0445792 CONTRIBUTION REF TO INDIVIDUAL				20JUN88		
ANDREAS, D INEZ MRS		BAL HARBOUR	FL 33154	NON-PARTY QUALIFIED		
MAJORITY CONGRESS COMMITTEE				APRIL MONTHLY	PRIMARY	750
88HSE/352/1333 0463245 MEMO(FILER'S 1 OF CONTRB GIVEN TO JT FR)		HOUSEWIFE		7DEC87		AMENDMENT
ANDREAS, D INEZ MRS		MIAMI BEACH	FL 33154	NON-PARTY QUALIFIED		
CAMPAIGN AMERICA				PRE-GENERAL	PRIMARY	1,000
88FEC/561/4579 0504727 CONTRIBUTION				7OCT88		
ANDREAS, D MRS		MIAMI SHORES	FL 33161	PRESIDENTIAL		
JESSE JACKSON FOR PRESIDENT '88 COMMITTEE				MAY MONTHLY	PRIMARY	1,000
88FEC/527/3469 0346354 CONTRIBUTION				16MAY88		
ANDREAS, D MRS		MIAMI SHORES	FL 33161	PRESIDENTIAL		
JESSE JACKSON FOR PRESIDENT '88 COMMITTEE				MAY MONTHLY	PRIMARY	1,000
88FEC/527/3469 0346355 CONTRIBUTION				16MAY88		
ANDREAS, D G		DECATUR	IL 62525	SENATE		
MATCH ELECTION COMMITTEE				MID-YEAR REPORT	PRIMARY	1,000
87SEN/009/1233 0141325 CONTRIBUTION		ARCHER DANIELS		15JUN87		
ANDREAS, D G		DECATUR	IL 62525	HOUSE		
KIKA DE LA GARZA FOR CONGRESS				MID-YEAR REPORT	GENERAL	1,000
87HSE/334/3865 0136635 CONTRIBUTION		BUSINESS EXEC		26JUN87		
ANDREAS, D G		MIAMI BEACH	FL 33154	SENATE		
BURDICK CAMPAIGN COMMITTEE				YEAR-END	PRIMARY	1,000
88SEN/005/2280 0240749 CONTRIBUTION		ARCHER DANIELS MIDLAND COMPANY		24DEC87		
ANDREAS, D G		DECATUR	IL 62525	NON-PARTY QUALIFIED		

ARCHER DANIELS MIDLAND CO. MAIL

930409337742

CONTRIBUTOR/LENDER/TRANSFERER REPORTING ENTITY MICROFILM LOCATION TRANSACTION TYPE	STREET ADDRESS	CITY	STATE ZIP	TYPE OF FILER REPORT TYPE DATE	ELECTION	AMOUNT
REPUBLICAN NATIONAL COMMITTEE - CONTRIBUTIONS (AKA REPUBLICAN NATIONAL FINANCE COMMITTEE FEC/534/2696 0401518 CONTRIBUTION		ARCHER-DANIELS-MIDLAND		JULY QUARTERLY 13JUL88	PRIMARY	5,000
ANDREAS, DWAYNE O MRS SENATOR LLOYD BENTSEN ELECTION COMMITTEE FEC/004/1248 0240881 CONTRIBUTION		MIAMI BEACH BARRY UNIVERSITY	FL 33132	SENATE YEAR-END 06DEC87	PRIMARY	1,000
ANDREAS, G JESSE JACKSON FOR PRESIDENT '88 COMMITTEE FEC/527/3610 0346512 CONTRIBUTION		PELLA	IA 50219	PRESIDENTIAL ANY MONTHLY 23APR88	PRIMARY	1,000
ANDREAS, G A DUKAKIS FOR PRESIDENT COMMITTEE, INC FEC/531/0082 0364188 CONTRIBUTION		MONMOUTH	IL 61462	PRESIDENTIAL JUNE MONTHLY 23MAY88	PRIMARY	1,000
ANDREAS, G A ALLEN JR MR REPUBLICAN NATIONAL COMMITTEE - CONTRIBUTIONS (AKA REPUBLICAN NATIONAL FINANCE COMMITTEE FEC/534/2696 0401519 CONTRIBUTION		DECATUR ARCHER-DANIELS-MIDLAND	IL 62526	PARTY QUALIFIED JULY QUARTERLY 13JUL88	PRIMARY	5,000
ANDREAS, G A JR MR PAUL SIMON FOR PRESIDENT FEC/488/2211 0107414 CONTRIBUTION		DECATUR ARCHER DANIELS MIDLAND COMPANY	IL 62526	PRESIDENTIAL OCTOBER QUARTERLY 19NOV87	PRIMARY	1,000
ANDREAS, G A MR PAUL SIMON FOR PRESIDENT FEC/488/2210 0107412 CONTRIBUTION		MONMOUTH G ALLEN ANDREAS AND COMPANY	IL 61462	PRESIDENTIAL OCTOBER QUARTERLY 14SEP87	PRIMARY	1,000
ANDREAS, G A MR BOLE FOR PRESIDENT COMMITTEE INC FEC/506/4329 0208095 CONTRIBUTION		PELLA	IA 50219	PRESIDENTIAL FEBRUARY MONTHLY 03MAR88	PRIMARY	1,000
ANDREAS, G A MR REPUBLICAN NATIONAL COMMITTEE - CONTRIBUTIONS (AKA REPUBLICAN NATIONAL FINANCE COMMITTEE FEC/534/2696 0401520 CONTRIBUTION		PELLA	IA 50219	PARTY QUALIFIED JULY QUARTERLY 13JUL88	PRIMARY	5,000
ANDREAS, G ALLEN JR BABICK CAMPAIGN COMMITTEE FEC/005/2281 0240773 CONTRIBUTION		DECATUR ARCHER DANIELS MIDLAND COMPANY	IL 62526	SENATE YEAR-END 18DEC87	PRIMARY	1,000
ANDREAS, G ALLEN JR DUKAKIS FOR PRESIDENT COMMITTEE, INC FEC/531/0082 0364190 CONTRIBUTION		DECATUR ARCHER DANIELS MIDLAND CO	IL 62526	PRESIDENTIAL JUNE MONTHLY 23MAY88	PRIMARY	1,000
ANDREAS, G ALLEN JR MICHEL FOR CONGRESS COMMITTEE H8IL/261/2487 0308334 CONTRIBUTION		DECATUR ADM	IL 62526	HOUSE OCTOBER QUARTERLY 31AUG88	GENERAL	500
ANDREAS, G ALLEN JR						

930400933743

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 14, 1990

Mr. Fred M. Wertheimer
Common Cause
2030 M Street, N.W.
Washington, D.c. 20036

RE: MUR 3161

Dear Mr. Wertheimer:

This letter acknowledges receipt on November 2, 1990, of your complaint alleging possible violations of the Federal Election Campaign Act of 1971, as amended ("the Act"), by Ms. Dorothy Inez Andreas, Mr. Henry Kravis, Mr. Ronald O. Perelman, Mr. Dwayne O. Andreas, Mr. Raymond Kravis, Mr. Ira Riklis, and Mr. Harold Simmons. The respondents will be notified of this complaint within five days.

You will be notified as soon as the Federal Election Commission takes final action on your complaint. Should you receive any additional information in this matter, please forward it to the Office of the General Counsel. Such information must be sworn to in the same manner as the original complaint. We have numbered this matter MUR 3161. Please refer to this number in all future correspondence. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

If you have any questions, please contact Retha Dixon, Docket Chief, at (202) 376-3110.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure
Procedures

9304093337744

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 14, 1990

Ms. Dorothy Inez Andreas
9909 Collins Avenue
Bal Harbor
Miami Beach, FL 33154

RE: MUR 3161

Dear Ms. Andreas:

The Federal Election Commission received a complaint which alleges that you may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3161. 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 in this matter. 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. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

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 completing the enclosed form stating the name, address and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

9304093337345

If you have any questions, please contact Frances B. Hagan, the staff member assigned to this matter at (202) 376-8200. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosures
1. Complaint
2. Procedures
3. Designation of Counsel Statement

93040933746

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 14, 1990

Mr. Dwayne O. Andreas
9909 Collins Avenue
Bal Harbor
Miami Beach, FL 33154

RE: MUR 3161

Dear Mr. Andreas:

The Federal Election Commission received a complaint which alleges that you may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3161. 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 in this matter. 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. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

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9304093337747

If you have any questions, please contact Frances B. Hagan, the staff member assigned to this matter at (202) 376-8200. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Lavrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosures
1. Complaint
2. Procedures
3. Designation of Counsel Statement

93040933748

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 14, 1990

Mr. Henry Kravis
Kolberg, Kravis, Roberts
71 East 71st Street
New York, NY 10021

RE: MUR 3161

Dear Mr. Kravis:

The Federal Election Commission received a complaint which alleges that you may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3161. 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 in this matter. 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. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

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9304093337749

If you have any questions, please contact Frances B. Hagan, the staff member assigned to this matter at (202) 376-8200. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosures
1. Complaint
2. Procedures
3. Designation of Counsel Statement

93040933750

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 14, 1990

Mr. Raymond Kravis
1804 First National Bldg.
Tulsa, OK 74103

RE: MUR 3161

Dear Mr. Kravis:

The Federal Election Commission received a complaint which alleges that you may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3161. 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 in this matter. 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. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

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9304093375 1

If you have any questions, please contact Frances B. Hagan, the staff member assigned to this matter at (202) 376-8200. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosures
1. Complaint
2. Procedures
3. Designation of Counsel Statement

9304093337752

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 14, 1990

Mr. Ronald O. Perelman
36 East 63rd Street
New York, NY 10021

RE: MUR 3161

Dear Mr. Perelman:

The Federal Election Commission received a complaint which alleges that you may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3161. 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 in this matter. 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. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

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9304093337553

If you have any questions, please contact Frances B. Hagan, the staff member assigned to this matter at (202) 376-8200. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosures
1. Complaint
2. Procedures
3. Designation of Counsel Statement

93040933754

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 14, 1990

Mr. Ira Riklis
1020 Park Avenue
Nev York, NY 10028

RE: MUR 3161

Dear Mr. Riklis:

The Federal Election Commission received a complaint which alleges that you may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3161. 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 in this matter. 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. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

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9304093755

If you have any questions, please contact Frances B. Hagan, the staff member assigned to this matter at (202) 376-8200. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosures
1. Complaint
2. Procedures
3. Designation of Counsel Statement

9304093337556

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 14, 1990

Mr. Harold Simmons
5430 LBJ Freeway
Suite 1700
Dallas, TX 75240

RE: MUR 3161

Dear Mr. Simmons:

The Federal Election Commission received a complaint which alleges that you may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3161. 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 in this matter. 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. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

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 completing the enclosed form stating the name, address and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

9304093757

If you have any questions, please contact Frances B. Hagan, the staff member assigned to this matter at (202) 376-8200. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosures
1. Complaint
2. Procedures
3. Designation of Counsel Statement

9304093337758

Processors of agricultural products

ADM

0GC8782

ARCHER DANIELS MIDLAND COMPANY BOX 1470 DECATUR, ILLINOIS 62525 TELEPHONE: 217/424-5515

DWAYNE O. ANDREAS
CHAIRMAN OF THE BOARD
AND CHIEF EXECUTIVE

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 NOV 29 AM 3:42

November 28, 1990

Mr. Lawrence M. Noble
General Counsel
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Attention: Lois G. Lerner
Associate General Counsel

RE: MUR 3161

Dear Mr. Noble:

This is in reply to your letter of November 14 stating that you have received a Complaint alleging that Mrs. Andreas and I have violated the Federal Election Campaign Act. I am not engaging a lawyer because I see no need for one. Also, I have not had time to check all the records, but I am sure that the contributions mentioned in the Complaint were in fact made. So there is nothing there to quarrel about.

On August 29, 1990, Mrs. Andreas and I wrote a letter to Ms. Lee Ann Elliott, Chairman, Federal Election Commission, in regard to this matter. I am enclosing copies of both of those letters and wish to incorporate them as part of my reply to this Complaint.

In addition, I want to state the following:

1. I have made a computer run of all the stories that appeared in the newspapers I would ordinarily read. They are the Los Angeles Times, New York Times, Washington Post, Wall Street Journal and Common Cause. From this I have found that they have run 32 stories about this Act before the one accusing people of violating it. In substantially all of these stories, it was stated that the limit was $25,000 per calendar year. In only two or three of them does it infer that it has to do with elections over a two year span.

2. Since this matter was brought up by the Los Angeles Times, just out of my own curiosity, I have asked several Senators, Congressmen, lawyers and professional political fund raisers and not a single one that I asked was aware that the limit was $25,000 per two year election period.

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From these facts, I have concluded that substantially every Congressman and Senator who voted for that law thought they were voting for a $25,000 per year limit.

As a result of this preponderance of evidence, I mistakenly believed it was $25,000 per year so did Mrs. Andreas and so did Mrs. Madding, my Administrative Assistant, who carefully accounted for these contributions to keep them within the $25,000 a year limit.

Under these circumstances, there is clearly no willful violation here to deal with. But since I am a great admirer of the work of Common Cause, I would suggest that you penalize me for not reading the fine print of the law. My suggestion is that I make a donation to Common Cause to be used expressly for the purpose of warning other givers that this widespread misunderstanding can get them into difficulties.

For your convenience, I have summarized the comments made in those 32 newspapers stories and also have included copies of the full stories in case you care to see them.

Sincerely,

Dwayne O. Andreas

/c

9304093337760

ADM

ARCHER DANIELS MIDLAND COMPANY BOX 1470 DECATUR, ILLINOIS 62525 TELEPHONE: 217/424-5515

DWAYNE O. ANDREAS
CHAIRMAN OF THE BOARD
AND CHIEF EXECUTIVE

August 29, 1990

Ms. Lee Ann Elliott
Chairman
Federal Election Commission
Washington, D.C. 20463

9304093337761

Dear Ms. Elliott:

This is in regard to MUR 3104 and your letter dated August 17. We have gone over our records and find that your listing of my campaign contributions for 1987 and 1988 are correct.

For a number of years, we have carefully monitored our annual contributions, believing that we were totally within the law by staying within $25,000 per calendar year. I am particularly surprised because, during that time, I can recall conversations with two lawyers and several professional fund raisers who all seemed to believe the same thing. Since I did not pay for a legal opinion, I certainly cannot fall back on that. Since the Times report came out, we have asked several fund raisers, two more lawyers, and three Senators and have not yet found anyone who seemed to know about the per-election interpretation.

My Administrative Assistant, Mrs. Claudia Madding, had the responsibility for staying within these limits. She kept very clear records, and we were extremely careful not to exceed that annual limit or other limits.

It was not until we read the story in the Los Angeles Times that the limit was cut in half by applying the contributions to the year of the election, no matter when they were made.

Of course, I am old enough to know that ignorance of the law is no excuse, and I would like to know if you have any suggestions as to how I can rectify this error.

We have made no contributions since the L. A. Times story came to our attention. If we continue that policy, our three years' average will soon be below the limit as we now understand it. Could this rectify our error?

Another suggestion. I could ask the candidates if my contribution was used in 1988 or to pay a 1986 debt; or if it was left over and used for the 1990 campaign.

For example, the $5000.00 given to the PAC very likely was not spent in the 1988 campaign. I have learned that the PAC I gave to had a balance of $138,367.86 on December 31, 1987. I gave $5,000.00 on April 2, 1988, but on December 31, 1988 it had a balance of $173,294.38. This could be interpreted to indicate that my $5,000.00 was not spent on a 1988 campaign.

Similarly, the $5000.00 given to the RNC could very well have still been there after the '88 campaign was over. This could also be true of other campaign funds. But I am hesitant to inquire of all of them unless you think the information is relevant.

In any case, it would be difficult, if not impossible, to prove that my $5,000.00 to the PAC was spent on the 1988 campaign.

If I were to uncover the fact that much of this money was not used in '88, could I in that way come within your parameters, or do you have any other suggestions?

In any event, conciliation would appear to be appropriate to resolve this matter.

Sincerely,

Dwayne Andreas

Dwayne O. Andreas

DOA:ji

9304093337662

MRS. D. O. ANDREAS

Decatur, Ill.
Sept. 30, 1990

Dear Madame Chairman;

Regarding your letter of 'August 17th MUR 3104'. As far as I know the information is correct, except, that I did not give two checks to Jesse Jackson. I think that my $1000.00 check was enclosed with another Pac check for $1000 and mistakenly reported by The Jackson Committee.

I read my husbands letter and wish to reiterate what he said.

93040933763

MRS. D. O. ANDREAS

I think it is quite likely that my contributions to

Michael for Congress - 1000
Campaign America - 5000
Republican Natl Com - 1000
Tom Lehman - 1000
Wright Appreciation - 1000
Sen. Lloyd Bentsen - 1000

were not used in the 1988 campaign but I do not have proof at this time. If this were shown to be correct; I would be way under my limit.

I have not contributed any money since the L.A. Times article appeared; because I was afraid they might be applied to a 1988 debt, which would make my error greater.

93040933764

MRS. D. O. ANDREAS

I do believe that conciliation is the appropriate way to resolve this problem.

Yours Sincerely

Mrs D O Andreas

930409337765

DIGEST OF QUOTATIONS PERTAINING TO THE FEDERAL ELECTION CAMPAIGN ACT OF 1974

01/31/73 -- **The Wall Street Journal**, p. 1
Title: A Campaign Spending Bill Strictly Limiting Donations Cleared The Senate

Quote: No one could give more than $3,000 in any contest; anything over $50 couldn't be in cash; **an individual's total donations to federal candidates in a year couldn't exceed $25,000.**

10/25/73 -- **The Wall Street Journal**, p. 24
Title: The Need to Curb Dollar Politics

Quote: A start was made nonetheless during the summer when the Senate passed the first bill in American history putting a ceiling on individual or political committee contributions to presidential and congressional candidates ($50 cash, $3,000 in cash and checks, and **a $25,000 limit to contributions for all candidates in one year.**)

11/06/73 -- **The Wall Street Journal**, p. 1
Title: Watergate Ripple

Quote: **Under the Senate measure, a person's gifts in any calendar year couldn't exceed $25,000 to all candidates.**

10/16/74 -- **The New York Times**, p. 31
Title: Bill to Reform Campaign Funds Signed by Ford Despite Doubts

Quote: Under the limits on contributions, **no individual could contribute more than $25,000 to all Federal candidates and organizations in an election year.**

01/02/75 -- **The New York Times**, p. 27
Title: Major Campaign Reforms Take Effect

Quote: **Beginning today, individuals are limited to overall contributions of $25,000 in a single year** and no more than $3,000 to an individual candidate -- $1,000 each in the primaries, a runoff, and the general election.

08/09/75 -- **The Washington Post**, p. A1
Title: Campaign Act Loophole is Discovered

Quote: The campaign law already is under challenge in the courts on grounds that its contribution limits of $1,000 to any one candidate for President and **$25,000 overall violates the giver's rights of free speech and petition.**

9304093337666

08/25/75 -- **The Wall Street Journal**, p. 5
Title: Firms' Worker-Financed Political Funds Are Expected to Multiply Under New Law

Quote: **The combination of all gifts couldn't top the individual's maximum limit of $25,000 a year.**

10/07/75 -- **The Los Angeles Times**, p. 1
Title: Justices Will Rule on Campaign Laws

Quote: Under the law, individuals would be able to contribute no more than $1,000 to a candidate in any one campaign and **no more than $25,000 to all political hopefuls in one calendar year.**

12/07/75 -- **The Los Angeles Times**, II; p.5
Title: Central Issue is Reform Financing

Quote: **An individual can contribute no more than a total of $25,000 to all federal candidates.**

01/31/76 -- **The Washington Post**, p. A1
Title: Spending Limits Struck Down

Quote: The difference, said the court, is that limits on contributions -- $1,000 per individual for each candidate, $5,000 for political organizations and committees and a **$25,000 limit for all political giving by an individual in any one year** -- are less direct and less serious restrictions than the limits on expenditures.

01/31/76 -- **The Los Angeles Times**, Part I p. 1
Title: Justices Void Key Election Money Curbs

Quote: The court split, 6 to 2, in upholding the law's contribution limits, which permit an individual to contribute no more than $1,000 to a candidate in any one campaign and **no more than $25,000 in one calendar year.**

02/07/76 -- **Facts on File World News Digest**, p. 86
Title: Election Law Upheld on Public Financing and Disclosure; Spending Limits and FEC Voided

Quote: The court thus struck down several provisions of the campaign laws: the ceilings on expenditures by congressional candidates in their campaigns; the $1,000 a year limit on expenditures by an individual in independent efforts for or against a specific candidate **(and the $25,000 limit on all such expenditures by an individual in a year)**, and the ceilings on campaign spending (from either their own, or contributed funds) by presidential candidates who did not accept federal subsidies.

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05/29/78 -- **The New York Times**, p. 8
Title: Vote Panel Issues Warning Bills

Quote: The commission also reported in the statement that **no individual could donate a total of more than $25,000 a year to political committees**, even if some or all of them were conducting unlimited independent campaigns.

01/01/78 -- **Common Cause Frontline**, v. 4, n. 1; p. 9
Title: Once Again: The Big Money Flows

Quote: While individuals are limited legally to contributing $1,000 per candidate per election, with an **overall contribution ceiling of $25,000 to all federal candidates**, a qualified PAC may give...

08/09/76 -- **U.S. News & World Report**, p. 61
Title: A Complicated Set of Rules Limits How Much You Can Contribute to Campaigns of Candidates for Federal Offices

Quote: **You can give a grand total of $25,000 a year to federal candidates and political committees.**

08/19/76 -- **The Washington Post**, p. B1
Title: The Influential Powers of Positive Giving

Quote: Donors may contribute to congressional races at $1,000 per candidate, **but may not contribute more than a total of $25,000 in a year.**

04/01/77 -- **Common Cause Frontline**, v. 5, n. 2; p. 5
Title: Report to the American People on the Financing of Congressional Election Campaigns

Quote: **Individuals may give no more than a total of $25,000 to all federal candidates in any calendar year.**

05/29/78 -- **U.S. News & World Report**, p. 79
Title: Politicians Strike a New Bonanza

Quote: They note that individual contributors are limited by law to $5,000 a year per individual campaign or PAC plus $1,000 per election for an individual candidate and **$25,000 total each year**

12/18/79 -- **The Associated Press**, PM Cycle
Quote: He (Eugene McCarthy) said future suits will seek to ban contributions limits for all challenging candidates and minority parties, **to remove the $25,000 annual ceiling on campaign contributions by individuals**, ...

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10/07/80 -- **The New York Time**, p. B12
Title: Justices Will Rule on Authority to Revoke Passport

Quote: In a ruling four years ago, the Supreme Court upheld the $1,000 **limit on contributions to individual candidates as well as an overall $25,000 contribution limit by individuals.**

06/26/81 -- **The Associated Press**
Quote: Under the same law, the medical association's individual members are free to donate $5,000 each to a number of political action committees, **subject to a $25,000 ceiling on contributions.**

11/19/81 -- **United Press International**
Quote: The annual contribution level an individual could make to all candidates in an election year would be increased from $25,000 to $40,000.

01/18/82 -- **United Press International**
Quote: He (FEC spokesman, Fed Eiland) noted that individuals can contribute up to $1,000 per election for each candidate and that **each person cannot contribute more than a total of $25,000 to candidates during an election year.**

04/04/82 -- **Heritage Foundation Reports**
Title: PACs, The Taxpayer and Campaign Finance Reform

Quote: Under the 1974 law, individuals were limited to contributing no more than $1,000 per candidate per election, with an annual overall aggregate limit of $25,000 for all political contributions.

Individuals could contribute only $1,000 to a candidate per election; $5,000 to a political committee; and $20,000 to the national committee of a political party, so long as the annual aggregate of all political contributions did not exceed $25,000.

Many agree it should be substantially raised. The overall aggregate **annual limit of $25,000** makes no sense..

09/01/82 -- **Common Cause Magazine**, p. 33
Title: Beyond Watergate

Quote: **Between candidates, political parties and PACs, individuals are now limited in their annual giving to a total of $25,000.**

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05/05/84 -- **National Journal**, v. 16, n, 35; p. 1618
Title: Another Campaign, Another Loophole

Quote: It added, however, that contributions to delegates could come only from authorized sources -- for example, from PACs but not from corporation or labor union treasuries -- **and that they were chargeable against an individual donor's $25,000 annual contribution limit.**

07/21/84 -- **National Journal**, p.5
Title: The Democratic Party's 'Fat Cats' Are Back

Quote: Although **the campaign law specifically limits individuals to contributing a maximum of $25,000 per year** to all federal candidates and political committees, the commission's ruling circumvented the law the agency is supposed to enforce.

09/01/84 -- **National Journal**, v. 16, n. 35; p. 1618
Title: Republicans and Democrats battling to Raise Big Bucks for Voter Drives

Quote: **Such contributions are limited to individuals and qualified PACs and count against the $25,000 annual federal spending limit for individuals.**

Like corporate and union treasury funds, any contributions made in excess of an **individual's $25,000 yearly federal limit** will be ineligible for use in the DNC's presidential and state parties' federal accounts.

03/16/85 -- **National Journal**, v.17, n. 11; p. 590
Title: Congress's Appetite for Controversial Campaign Finance Reforms Diminishing

Quote: Not only were contributions to a congressional candidate limited to $1,000 for individuals and $5,000 for PACs **(single donors could give no more than $25,000 in all during an election cycle)**, but candidates also faced severe spending limits.

11/12/85 -- **Daily Report For Executives**, No. 216; p. A-7
Title: Witnesses Call on Congress to Expand FEC's Powers, Curtail Major Party Donations

Quote: For example, McGarry said, because of "shortcomings" in its computer data base, **the agency is not possible to monitor the $25,000 overall annual contribution limit on individuals** unless violations ar brought to FEC's attention.

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02/02/87 -- **Legal Times**, p. II
Title: Court Erases Ban on Political Spending By Advocacy Group

Quote: The plain language of the statute would suggest that an individual may give more than $5,000 in political contributions to a non-profit corporation, as long as the corporation is not a political committee, **but may not exceed the $25,000 annual limit on total political contributions.**

11/15/90 -- **1990 State News Service**
Quote: The complaint, filed Nov. 1, charges the seven with violating the Federal Election Campaign Act, **which forbids individuals from giving aggregate amounts of more the $25,000 to political candidates in a calendar year.**

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Common Cause **frontline** April-May 1977

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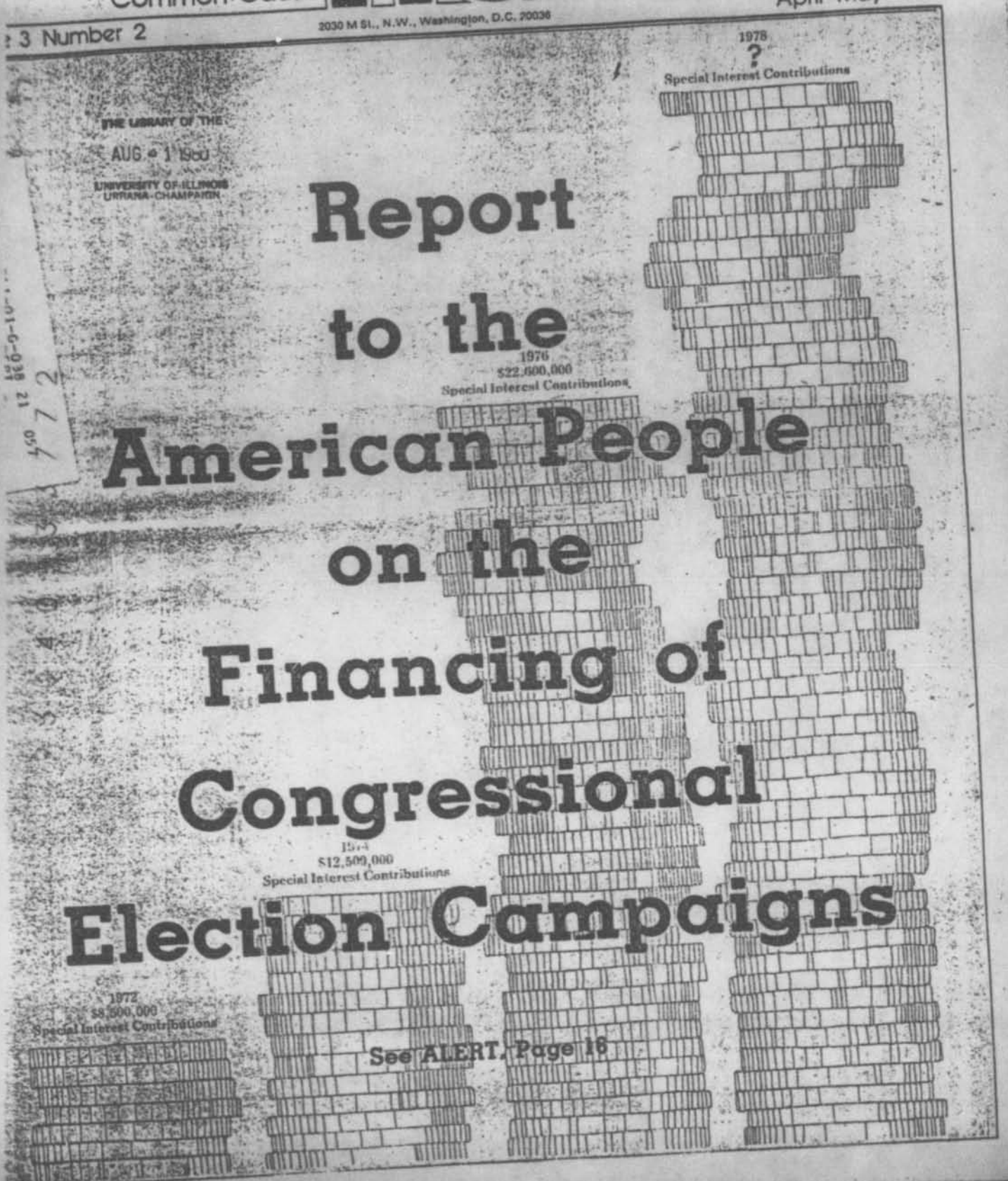
Report to the American People on the Financing of Congressional Election Campaigns



See ALERT, Page 16

The Present System

Any citizen who meets age and residency requirements may run for election to Congress. But, the costs of mounting a realistic election campaign have risen astronomically. While wealthy candidates can spend as much of their own funds as they wish, those candidates unable to afford the vast outlays of dollars the average campaign requires, must seek other money sources.

Last year 817 House candidates spent approximately $55 million in the 1976 general election campaigns trying to win a seat in the House of Representatives, while 64 Senate candidates spent $38 million in the races for 33 seats in the U.S. Senate. The total—$93 million—surpassed 1974's total of $74 million.

The winners of last year's race spent more than $55 million of their own and other people's money on their political campaigns. It cost the 292 Democrats and 11 Republicans who won Senate seats in 1976 an average of $617,000 each to win. The successful representatives—292 Democrats and 143 Republicans—spent an average of $80,000.

But many candidates spent much more. For example, nine candidates for the Senate, from states with over 10 million population, each spent more than $1 million on their 1976 campaigns.

Costs of campaigning are different in a state like Montana than they are in New York, and while some candidates spend much more than the average, others spend much less.

But even when a candidate walks the state, as did Sen. Lawton Chiles in 1970 during his Senate race in Florida, and stays overnight with supporters, communication with the public through the media requires money.

Radio and TV advertising, billboards, pamphlets describing qualifications for office and positions on issues—all these expensive means of communication must be used by a candidate to compete successfully against others who are running for the same office.

Money is the lifeblood of politics. One might even say that money buys elections—simply because it can buy

Dan McCoy—BLACK STAR

the exposure necessary to get a candidate elected.

So how does a candidate raise the amount of money needed to wage a successful campaign?

Under our present system, if candidates are not wealthy enough to pay for their own campaigns, they must search for other sources of campaign funds.

The "richman's loophole"—the ability of wealthy candidates to use their own money in their campaigns for office without limitation—allows wealthy candidates to retain unfair political advantages over non-wealthy challengers. In the 1976 Congressional election, H. John Heinz III, heir to the ketchup and pickle fortune, spent almost $2.5 million of his own family's money to become a U.S. Senator from Pennsylvania.

Contributions for political campaigns come from three sources: individuals, political parties and economic or ideological interest groups.

Although direct corporate contributions to candidates in Federal elections have been prohibited since 1907 when Congress passed the Tillman Act, business, labor and other interest group money has nevertheless found its way into political campaigns through "Political Action Committees" (PACs)—which are permitted under law.

It has been only in the last several years that the public could find out who was giving how much to which political candidates.

In 1971, public pressure on Congress brought about passage of a new Federal Election Campaign Act which required disclosure of key information. Prior to 1971, the only disclosure law on the books was the weak and loophole-ridden Federal Corrupt Practices Act of 1925, which had seldom been enforced.

The 1971 Act required all contributors of more than $100 to be identified by name, occupation and place of business. It was amended in 1974 —in a reaction against the flagrant campaign finance abuses exposed by "Watergate"—to provide for a public financing system for Presidential campaigns, an independent Federal Election Commission to administer and enforce the law, and to set limits on how much any one person or group could legally give to a candidate for Congress.

A Supreme Court ruling in 1976 upheld these provisions as constitutional, but said that no limits could be put on how much a candidate could spend of his or her own money—or how much a candidate could spend in all—unless the candidate received public funds. And while public funds are now used for the Presidential election campaigns, there is at present no system for public funds to be used in Congressional campaigns.

The special interest political contributions, which in last year's campaigns reached a record high of $22.6 million, are not distributed haphazardly.

Rather, as is apparent from the record of who gives and who gets, special interests give in order to receive.

Although the contributions do not actually "buy" votes, such contributions ensure an open door and easy access to public officials—therefore they are carefully placed,

Contributions by Individuals

In the 1974 election campaign, individuals associated with the following industries or occupations made direct contributions of over $500 each to House and Senate candidates, to total $22,177,611. Below is the occupation or industry connection of the top givers.

Connection of Individual	Total Contributions
General business	$4,458,129
Attorneys	2,651,828
Construction and Real Estate	2,467,651
Financial	2,289,434
Banks ($711,118), Investments ($1,013,483), Insurance ($564,833)	1,682,620
Oil, Gas, Natural Resources	1,639,895
Manufacturing	716,845
Agriculture	578,795
Doctors	358,035
Transportation	

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The Present Law . . .

- Individuals may contribute up to $1,000 in the primary and $1,000 in the general election to any candidate for the House or Senate.
- Individuals may give no more than a total of $25,000 to all federal candidates in any calendar year.
- Organizations or groups (political action committees) may contribute up to $5,000 in the primary and $5,000 in the general election to any candidate for the House or Senate. Groups are not limited as to the total number of candidates they may give to.
- Each national and state political party committee may contribute $5,000 in the primary and $5,000 in the general election to a candidate for the House or Senate,
- In addition, each political party's national and state committee may spend in each state up to 2 cents times the number of eligible voters in that state on behalf of the party's Senatorial nominees, and $10,000 per Congressional nominee.
- An individual may contribute up to $5,000 to a multi-candidate committee—a committee formed to give money to a number of political candidates.
- An individual can contribute up to $20,000 to political committees maintained by a national political party.

Candidates, due to leadership roles, committee assignments or seniority—or merely their incumbency—are more valuable friends to have in Congress than others.

A good example is Minority leader John Rhodes (R-Ariz.) who led all other House candidates in the amount of contributions received from special interest groups in 1976. Rhodes collected more than $98,000 from business, professional and agricultural groups for his 1976 campaigns. As former Ford press secretary Gerald ter Horst wrote, "All those gifts came his way because the donors were making an investment in a man who happens to be House Republican leader . . . The more influential you are in Congress, the more money you are apt to get from special interest lobbies."

Two senior Democrats who became members of the House leadership for the first time in 1977 turned out to have been among the leading recipients of special interest group contributions—Democratic Majority Leader Jim Wright (D-Tex.), $40,500; and Deputy Majority Leader Daniel Rostenkowski (D-Ill.), $44,400.

Reports filed with the Federal Election Commission also demonstrate the proven appeal of incumbents for special interest contributors.

Incumbents consistently get three times as much from special interest groups as their challengers, some groups favoring incumbents in their contributions by 7 to 1—regardless of whether the incumbent is Democrat or Republican, or the contributor corporate or labor. (See chart)

And interest groups are not the only givers to favor incumbents. So do individual contributors. During the 1972 and 1974 Congressional elections, incumbents were able to raise and spend an overall total of $62 million on their campaigns—compared with $36 million raised and spent by their challengers.

"It is particularly disturbing that the bulk of special interest contributions represents a sort of investment in the careers of incumbent Congressmen and Senators, with the aim of enhancing the influence of the financing groups as the power of incumbents grows . . . Obviously this money is given to buy influence," a Wall Street Journal analyst recently reported.

Well, sir, if you're trying to bribe me you'll end up in jail, but if you mean it as a campaign contribution it's quite another thing

Ideological groups who only accounted for $1.2 million of contributions to 1976 general election candidates were the one group to favor challengers over incumbents—by a margin of 1½ to 1.

While incumbency and large special interest contributions tend to assure election success, there are exceptions: Former Sen. John Tunney, incumbent of California, who received a total of $164,223 from labor groups—the most sizable contribution from labor in 1976—was nonetheless defeated by Sen. S.I. Hayakawa. And former Sen. James Buckley, incumbent of New York, who received $120,339 from business, professional and agricultural groups in 1976, lost to Sen. Daniel Moynihan.

The relationship, however, between special interest contributions and political success is clear.

Women candidates—most of whom are challengers—are another group who strongly feel the result of the incumbency patterns of interest group giving.

Women candidates received very limited funds in 1976 from interest groups and rarely receive any contribution over $2,500 from an individual interest group.

Of the 96 women party candidate running in House primaries, 88 re ceived no individual interest grou contributions during the primar period of more than $2,500; 48 o those 88 received no political actio committee money at all; and 21 o the 88 received total interest grou contributions of $5,000 or less. Of 3 women major party candidates wh made it into the general election, 2 received no individual contributio over $2,500 during the general elec tion period and 11 of these receive total interest group contributions o $5,000 or less.

There is the sense of a close circle involved in the special interes giving to incumbents—incumbent win in large part because they ge most of the money, and they ge most of the money because they ar incumbents.

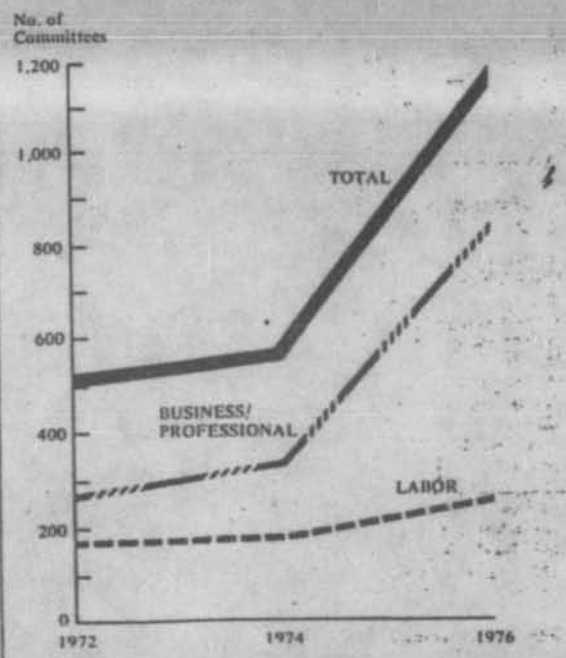
Members of key committees where the fate of legislation often lies, are also heavy favorites t garner sizable special interest con tributions.

"The members of House Way and Means and Senate Finance Com mittees that write tax, social securit and foreign trade legislation, re ceived more than $2 million in cam paign contributions last year, eve though many of them had safe seat and faced nominal opposition o none," the New York Times reporte recently.

"In the same pattern, the dair lobby gave to members of the Agri culture Committee, the Maritim unions to those on maritime commit tees and the teachers' lobby to mem bers of the education committees There is nothing unusual about thi pattern of special interest giving, bu there is nothing very good about i either."

The seven members of the Senat Finance Committee who sought re election in 1974 received about $3 million in contributions in a 16-month period. About 45 percen of that came from individual con tributors of $500 or more and specia interest groups. One Senator re ceived 69 percent of his total con tributions from these contributors and another, 63 percent.

PACS: what they are/how they grow/what they give



Contributions

Interest Group Contributions to Congressional Candidates

	1974	1976
Business/ professional/agriculture	$4,804,473	$11,562,012
Business	2,506,946	7,091,374
Health	1,936,487	2,694,910
Lawyers		241,280
Agriculture	361,040	1,534,447
Labor	6,315,488	8,206,578

The above table shows the growth in political committees since 1972 and how the amount of money that they gave to congressional candidates in the 1974 and 1976 elections was affected by that growth.

A continuing relationship exists between special interest contributors and those whose campaigns they finance. Lawmakers receive money for their campaigns—and if they continue to represent the interests of the givers when the votes come—they can usually count on more money for their next campaigns.

For example, in July 1976, the Senate voted for a major tax break for the maritime industry, despite strong opposition from the U.S. Treasury. Nonetheless, the measure passed. Among Senators voting for the tax break were 30 who had received more than $270,000 in campaign contributions from maritime unions in their campaigns since 1972. The chief sponsor of the tax break had received $22,000 from the maritime interests in 1974; the other 29 had received contributions ranging from $21,000 to $1,000 each.

Just who are the "special interests" who poured $22.6 million into House and Senate races in 1976—and what did they stand to gain?

Labor Union PACs continued in 1976 to be the single largest interest group givers to Congressional candidates, with $8.2 million in total from the various labor PACs. This represented a $2 million or 25 percent increase over what they had given in 1974. Within the unions—

- The AFL-CIO "COPES" were the biggest contributors with nearly $1 million in contributions;
- Next largest givers in the labor group were the Maritime-related unions, which gave $980,000;

PACs representing corporate, business trade associations, the agricultural interests and professions (doctors, lawyers, health professionals)—when looked at together—gave an even larger amount in 1976 than labor—$11.6 million nearly triple what these interests gave in 1974 ($4.9 million). Within these groups:

- Agricultural interests, which contributed $361,000 in 1974 jumped more than 400 percent to a record $1.5 million in 1976. Dairy committees alone gave $1.4 million, a six-fold increase over 1974 when in the wake of the Watergate scandals involving "laundered" money they decreased their contributions to $225,000. In 1976, it was back to business as usual for the dairy interests.
- The Health groups together gave $2.7 million in 1976, about a third more than the $1.9 million they contributed in 1974. The American Medical Association led health group giving with its PAC gifts of $1.8 million.
- Business groups nearly tripled their giving from $2.5 million in 1974 to $7.1 million in 1976 campaigns. They were second only to labor in the total amount of contributions given to congressional candidates in 1976 campaigns. For example, the National Association of Realtors substantially increased their political activities in 1976, giving $606,000 to Congressional candidates up from $261,000 in 1974.

For the first time last year, these special interest groups were by law limited to a $5,000 contribution to any one candidate for the House or Senate in the primary, and another $5,000 in the general election.

But the potentially limiting effect of the contribution limits was undermined by the most significant campaign finance development of the 1976 Congressional elections—the entry of more than 500 new organizations into the political action-giving arena. Each could contribute $5,000 to a candidate in the primary and another $5,000 in the general election.

What do interest groups stand to gain from their contributions to candidates for Congress?

Sen. Russell Long (D-La.) Chairman of the Senate Finance Committee, calls campaign contributions "monetary bread cast upon the water to be returned 1,000 fold."

And Rep. Morris Udall (D-Ariz.) has said:

"This money is used, not to buy specific votes, but to assure a generally favorable atmosphere for each group's legislative aims—aims which involve public policies that mean vast amounts of money to those groups at the expense of the general public."

Following are three examples which show how campaign "investments" can be used to try to influence decisions.

the dairy industry . . .

After the scandals of Watergate, some Congressional candidates in the 1974 election were actually refusing to accept dairy industry money. But the dairy lobby is now back in business in full force.

With crucial dairy price supports under the jurisdiction of the House Agriculture Committee, it comes as no surprise that $181,225 of this milk largess went to 17 of the 31 Democratic members, plus $24,761 to 6 of the 15 Republican members for a total of $205,986. That's a lot of milk.

American Medical Association . . .

One of the most far-reaching considerations before this Congress will be the passage—or rejection—of some form of national health insurance. Depending on the way it is written, it could bring billions of

Political Action Committees (PACs) are organized by interest groups as the most advantageous way to make contributions to political candidates.

While individuals are limited legally to contributing $1,000 per candidate per campaign, with an overall contribution ceiling of $25,000 per campaign, a qualified PAC may give $5,000 per candidate, with no overall limitation, according to 1974 amendments to the Federal Election Campaign Act.

Another advantage to the interest group is that a PAC contribution is readily identifiable to the candidate as representing a special interest—which is not necessarily apparent from the contributions of individuals.

Federal law states that to qualify for the higher contribution limits, a PAC must:

- have 50 or more donors.
- be in existence for six months or more.
- make contributions to five or more federal candidates.

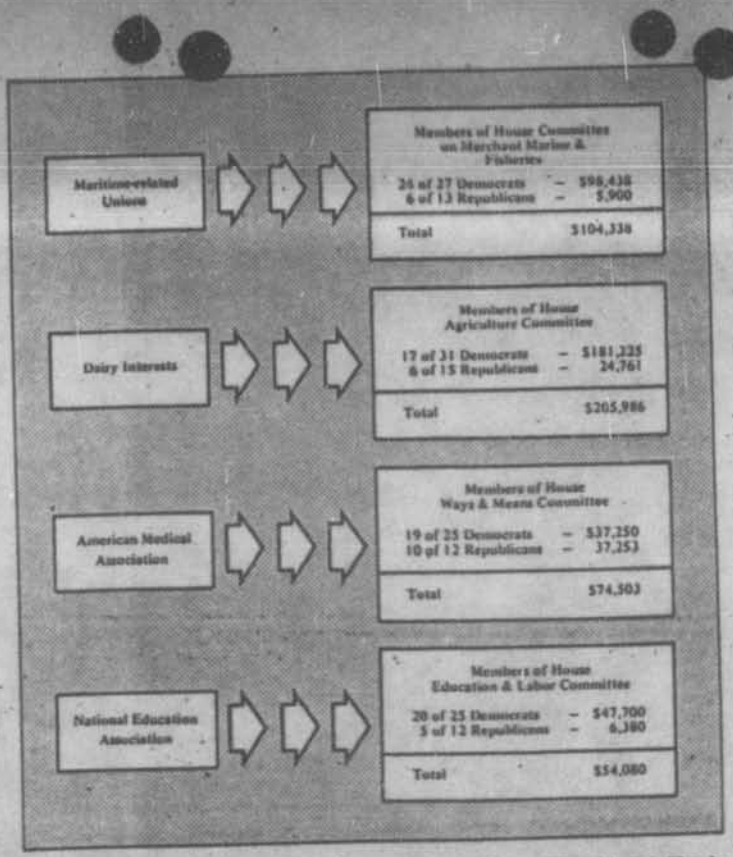
PACs must also be funded by voluntary contributions.

Corporations, labor unions and national banks may not make political contributions other than through a PAC, and PAC funds must be kept separate from other funds. A corporation may solicit contributions from its shareholders, senior executives and managerial personnel and their families; a union may solicit from its membership and their families. As a rule, decisions as to who receives contributions are made at the top of the organization.

Like candidates, PACs must file periodic reports with the Federal Election Commission listing name, occupation, address and principal place of business for all contributors of more than $100, as well as expenditures and receipts. There are well over 1,000 PACS nationally.

The Committee Connection

Special interest groups target their campaign giving to members of key committees which have jurisdiction over matters involving their interest. The following examples from 1976 election reports show the connection.



dollars into the pockets of physicians and billions of costs to the taxpayers.

Little wonder then, that the AMA has risen to the top of the special-interest contributors' list with $1.8 million given to 1976 Congressional candidates by their political committees. Contributions of over $74,000 went to 29 of the Members on the 37-member House Ways and Means Committee, where the fate of national health insurance could be decided.

real estate interests . . .

On Dec. 4, 1975, the House of Representatives rejected an amendment designed to tighten real estate tax-shelter loopholes. Supported by the Treasury Department, but opposed by the real estate industry—the passage of this amendment would have raised an additional $167 million in tax revenue in 1976 alone, and a cumulative total of over $2 billion by 1981.

Delving into the campaign contributions of the Real Estate Political Education Committee (REPEC), Common Cause discovered that 100 House members who opposed the amendment to plug this loophole had received $100,500 in contributions during the 1974 elections. In all, the REPEC gave over $251,000 to federal candidates during the 1974 campaign, and 1976 contributions from real estate interests more than doubled to $605,973.

In introducing legislation for public financing of Congressional campaigns in the House of Representatives in March of this year, Rep. Morris Udall (D-Ariz.) called on House Members to put a "not for sale" sign on Congress:

"More than anything else—more than the sex scandals or junkets or the issues of pay and fringe benefits—I believe the institution of Congress is damaged, both in public perception and in the integrity of its functioning by the escalating costs of campaigning and the massive amounts of special interest money being pumped into election campaigns."

Despite the reform legislation passed in 1971 and 1974 to deal with campaign finance abuses, there is clear evidence that the present campaign financing system for Congress has resulted in some fundamental problems:

- It permits special interests—business, labor and professional groups—to "invest" in a candidate's campaign, thus causing government decision-making to be influenced by campaign contributions at the expense of the public interest.
- It heavily favors incumbents who can raise double the money raised by their opponents and who enjoy the perquisites of office such as postage-free mailing privileges.
- It allows wealthy candidates to retain unfair political advantage over less wealthy candidates;

As a result the system compromises the integrity of Congress and diminishes public trust in government.

Pollster Louis Harris has told a Senate subcommittee that a Harris survey disclosed that 74 percent of the people believe that "special interests get more from government than the people do."

The special interest contributions tie the hands of Congress and undermine its capacity to provide national leadership in policy issues. When money provides special access to elected officials and preferential treatment for campaign contributors, the political process is distorted and public trust is severely undermined.

Congress pays a big price for this system. So does every incumbent office holder—every challenger and every citizen.

Perhaps the most disturbing result of the present system is its inherent stifling of competition in House and Senate races.

Citizens who might wish to become involved in politics can be deterred by the need to become indebted to special interests in a process Sen. Hubert Humphrey has described as "demeaning and degrading"—and if they are not wealthy themselves, the odds are stacked against them.

". . . only those who are themselves wealthy or are closely tied to special interests can challenge incumbents with any hope of parity in campaign resources. And democracy, like the free market, can only function properly when there is active spirited competition," said chief sponsors in March when they introduced public financing legislation for Congressional campaigns in the House of Representatives.

What does it all add up to for the public?

Clearly to the need for a new system of financing Congressional election campaigns—a new system which will free those seeking public office from money ties to special interests.

Incumbent/ Challenger Ratio for 1976 Interest Group Giving

Agriculture	7.29 to 1
Business	4.01 to 1
Health	3.43 to 1
Lawyers	5.86 to 1
BUSINESS/ PROFESSIONAL	4.13 to 1
LABOR	2.97 to 1
MISCELLANEOUS	2.40 to 1
IDEOLOGICAL	.69 to 1
TOTAL INTEREST COMMITTEES	3.14 to 1

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Once Again: The Big Money Flows

Three recent Common Cause reports on special interest giving to Congressional candidates indicate that it will be "business as usual" in the 1978 Congressional campaigns unless public financing passes this session.

The studies show that:

More than 230 new Political Action Committees (PACs) registered for the first time with the Federal Election Commission during 1977—a 20 percent increase over the total number of PACs registered for the 1976 election. Among the new PACs are Committees formed by General Motors Corp.; American Telephone and Telegraph; United Airlines; Boeing Co.; Motorola Inc.; Nabisco Inc.; Honeywell Inc.; Ashland Oil Co.; General Dynamics Corp.; and the American Petroleum Refiners Association.

Sixty-three House members from 26 states held campaign fund-raisers in Washington, D.C. during the first nine months of 1977—a clear invitation to Washington lobbyists and the interest groups they represent to channel special interest money to Members of Congress.

Members of the House Ways and Means Health Subcommittee received contributions totaling $73,462 during their past two Congressional campaigns from the PACs of the American Medical Association and the Federation of American Hospitals. These two health interest groups have strongly opposed President Carter's legislation to impose controls on rising hospitalization costs, legislation which has been assigned to the 13-member Subcommittee for consideration. The Subcommittee Chairman, Daniel Rostenkowski (D-Ill.), received $5,000 from the AMA in both 1974 and 1976. Another member of the Subcommittee, Rep. Omar Burleson (D-Texas), received $4,000 from the AMA in both 1974 and 1976, despite the fact he has been unopposed in both his primary and general election races for Congress since 1970.

The number of PACs soared from 516 in 1974 to 1,166 for the 1976 election and the flow of special interest money did the same—nearly doubling during that period from $12.5 million in 1974 to $22.6 million in campaign contributions in 1976.

Political Action Committees are organized by interest groups as the most advantageous vehicles to make contributions to political candidates. While individuals are limited legally to contributing $1,000 per candidate per election, with an overall contribution ceiling of $25,000 to all federal candidates, a qualified PAC may give $5,000 per candidate per election, with no limitation on the overall total it may give to all federal candidates.

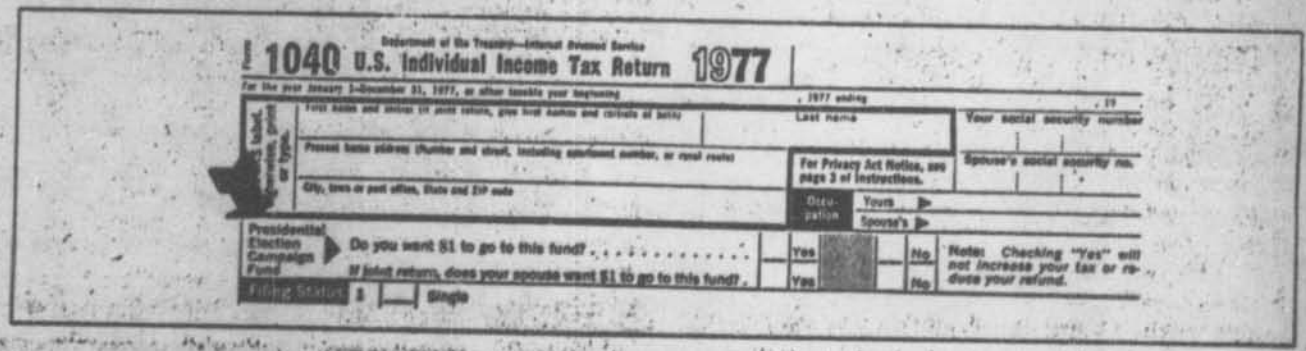
Another advantage to the interest group is that a PAC contribution is easily and readily identifiable to the candidate as representing a special interest.

Campaign contributions from interest groups during the first 10 months of 1977, a non-election year, reached $2.4 million, according to one of the Common Cause studies.

In a report on Washington fund-raisers released Feb. 1, Common Cause Senior Vice President Fred Wertheimer said the Washington, D.C. fund-raising system "ought to be done away with but it won't be until the system for financing Congressional races is changed."

Special interest groups, according to the Common Cause study, gave $13.2 million to 1976 House and Senate incumbents compared with $4.1 million to their challengers—more than a 3 to 1 ratio.

"Washington fund-raisers play a central role in channeling contributions to incumbents," Wertheimer said.


Form 1040 U.S. Individual Income Tax Return 1977

Presidential Election Campaign Fund — Do you want $1 to go to this fund? Yes / No. If joint return, does your spouse want $1 to go to this fund? Yes / No. Note: Checking "Yes" will not increase your tax or reduce your refund.

Filing Status 1 Single

Don't Forget the $1 Check-off

It's check-off time again.

The check-off—key to cleaning up Presidential campaign financing—tells the government to direct $1 ($2 on joint returns) of your taxes into the Presidential Election Campaign Fund. The funds collected through the check-off go into an account to be divided among the major and minor presidential candidates for use in the general election campaigns.

The check-off simply assigns $1 (or $2) of the tax you already owe.

Political donors should also remember that they may deduct from taxes owed up to half of contributions up to $25 on a single return or $50 on a

ALL THE PRESIDENT'S DONORS

Watergate closed out an era of fat-cat influence at the White House but a new one has begun.

THE MOSBACHER CONNECTION

COVER STORY

by Jean Cobb, Jeff Denny, Vicki Kemper and Viveca Novak

IT'S OCTOBER 1971. American Airlines Chairman and CEO George Spater is dining in New York with Herbert Kalmbach and another fundraiser for CREEP, the Committee to Re-elect President Nixon, when Kalmbach makes Spater a bold offer: Give $100,000 to CREEP and become part of a "select class" of Nixon supporters.

Spater is more than interested, mindful that American Airlines has about 20 substantial business matters pending with the federal government, including a proposed merger with another airline and new routes to Australia, the Orient and Europe. Spater arranges for American to make the contribution. Why? "There were two aspects," he later would tell the Senate Watergate Committee. ▶

EVERETT PECK

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THE TEAM 100

The RNC did not release the professional affiliations of contributors to Team 100. *Common Cause Magazine* determined the connections of these individuals (as of 1988) using FEC records, news clips and other sources.

Food, Alcohol & Tobacco

Dwayne Andreas** Archer Daniels Midland
Louis Bantle U.S. Tobacco
James Boswell J.G. Boswell & Co.
W.L. Lyons Brown Brown, Forman Distilleries
John Dorrance** Campbell Soup
Tom Etheridge Choctaw Maid Farms
Jose 'Pepe' Fanjul Chontalpa Corp.
Donald Philip Kelly Beatrice Co.
Jack Laughery Insco-Hartco
Howard Leach Cypress Farms
Howard Long Coronet Foods
Howard Margolese Sun World International
Mrs. Myron Jean Mantle Rancher
Mr. & Mrs. George Pillsbury Pillsbury
Asst. Robert Stuart Jr. Quaker Oats

Real Estate & Construction

George Argyros Arnel Development
James Baldwin The Baldwin Cos.
Peter Bedford Bedford Properties
Ralph Bodine The Marlin Group
John Bell Chateau Land Development
Joe Ministrelli Chateau Land Development
William Bone Sunrise Co.
Burton Boothby MPM Inc.
Donald Bren Bren Investments, Irvine Co.
Fred Bullard Sound Builders, BCH Buildings
John Cafaro Cafaro Co.
Janet Silvestri Cafaro wife of above
A. James Clark Clark Construction
Alec Courtelis** Courtelis Cos.
William Lloyd Davis Davis Pacific
Edward DeBartolo Jr. DeBartolo Corp.
Robert DeMattia DeMattia Co.
T. Lloyd Ecclestone National Investment
Joseph B. Gildenhorn* JBG Associates
Albert Ginsberg Plaza Realty Investors
Kenneth Good Gulfstream Land & Development
Murray Goodman Goodman Co.
Sheldon Gordon Developer
Cheryl Halpern CFYM Associates
Charles Heather* Pacific Southwest Capital, Black Mountain Commerce Park
George Kettle Century 21
John B. 'Kirsy' Sr. Kirsy Industries
Jay Kislak** Kislak Mortgage
George Klein Park Tower Realty
Don Koll Koll Co.
Douglas Kropp Kropp Co.
Alan Lindsay Carnegie Center Assoc.
Gen. William Lyon Pac. William Lyon Co.
Robert E. Magnuson III Magnuson Hotels Portland, Palm Leasing
Edgar Masters III Southdown Inc.
Leonard Miller Lennar Corp.
Herbert Morgan Real Trip Co.
Robert Mosbacher Kimbob Inc.
David Murdock Pacific Holdings
Spencer Partrick Lasky, Acquisitions
Allen Paulucci Pyptex MPX
J. Michael Quenon J. Michael Quenon & Assoc.
Richard Rubin Rubin Cos.

CONTINUED ▶

* Ambassadorial nominee
** Also gave to CREEP
*** Also gave $100,000 to the Democrats' soft money fund

"Would you get something if you gave it, or would you be prevented from getting something if you didn't give it?"

Fast forward to the 1988 election campaign. Eastern Airlines Chairman Frank Lorenzo comes up with $100,000 that helps the 1988 Bush presidential bid, putting him in a select group of Republican donors known as Team 100.

Lorenzo's airlines have several substantial matters pending with federal agencies in 1988 in addition to the usual government airline regulation. Eastern is locked in a bitter struggle with its unions, and the National Mediation Board is trying to settle the dispute. At the urging of the unions, two federal agencies have conducted probes to determine whether Eastern and another Lorenzo airline, Continental, are fit to continue operating.

Fast forward again to March 1989. George Bush, who has been in the White House for two months, sides with Lorenzo in the continuing Eastern dispute by rejecting the recommendation of the National Mediation Board, which had urged the president to create a federal emergency strike settlement board providing a 60-day cooling-off period. Days later the unions walk. It's the first time in the board's 56-year history that a president has declined to take its advice in any airline labor dispute.

Months later, Bush vetoes Lorenzo-opposed legislation that would have created a congressional "blue ribbon" commission to investigate the Eastern strike. And currently, the Bush White House is floating a veto threat against a House-passed bill that includes a "two-time loser" provision targeted at preventing airline owners in bankruptcy — read: Lorenzo — from buying out other airlines. "The Bush administration has pretty consistently taken a position that is against the interests of workers and in the interest of Lorenzo," charges John Mazor, spokesman for the Air Line Pilots Association in Washington.

Rep. Doug Bosco (D-Calif.), a critic of Lorenzo for more than a decade, believes that the airline magnate's $100,000 donation was an important part of his successful all-out lobbying blitz.

"Frank Lorenzo knows how to use and abuse this system very well," Bosco says. "A hundred thousand dollars is a big contribution. You don't give it anonymously and send it to a post office box; you give it to people who guarantee you'll be remembered for it. Anytime you give that kind of contribution you do it to have your name known among the highest echelons of the party."

Lorenzo is only one of 249 people listed as having provided $100,000 to Team 100, a big-money drive operated out of the Republican National Committee (RNC) by Robert Mosbacher, a longtime fundraiser for George Bush and chief fundraiser for Bush's 1988 presidential campaign. After Bush won the GOP nomination in August 1988, Mosbacher ran Team 100 at the RNC and raised more than $25 million that helped elect President Bush.

A *Common Cause Magazine* investigation reveals that Mosbacher's Team 100 is a veritable Who's Who of American business. The $100,000 contributors include 66 in the investment and banking community, 58 in real estate and construction, another 17 in the oil industry, and 15 from food and agriculture. Team 100 also includes members of the entertainment, cable, insurance, steel and auto industries.

Almost across the board, Team 100 members or the companies they are associated with want something from the government — whether it's broad policy initiatives like Bush's proposed reduction in the capital gains tax or favors more specific to a company or industry. Many gave their $100,000 at a time when they had significant business or regulatory matters pending with the federal government — or knew they likely would under the Bush administration. Most of those contacted declined to comment on their contributions.

Lorenzo's Continental Airlines asked the Transportation Department for approval in January to fly non-stop four times weekly between Houston and Tokyo. Already pending was its request to fly three weekly one-stop flights to Tokyo. In December Eastern landed a $52 million government contract to provide air travel to federal workers.

There's no evidence that Eastern Airlines received any special favors under the Bush administration as a result of Lorenzo's $100,000 contribution. Lorenzo's spokesman did not return repeated telephone calls, and the White House press office would not respond.

But there's a perception problem — and a risk of more than that. When an individual who has served as a presidential candidate's chief fundraiser seeks huge contributions from corporations, or their executives, it raises fundamental questions in the public's mind. Did the contributors give in an effort to influence government decisions? And will such contributions ultimately have this effect?

The Bush administration makes no pretense about maintaining an arms-length relationship with the Team 100 donors. They are wined and dined at the White House and at events held in their honor. They are given special briefings

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Jean Cobb is associate editor, Jeff Denny is senior research associate, Vicki Kemper is editorial consultant and Viveca Novak is senior staff writer. Editorial assistant Amy Young, research assistant Warren Cohen and interns Peter Indivino and David Hyden helped with research.

and regularly hobnob with ranking Bush appointees.

Meanwhile corporate executives and others on Team 100 are being asked to continue giving big money. "They're still giving to the party, it's not like they dropped off after the presidential year," explains Mary Matalin, chief of staff of the RNC. "They're still Team 100 guys, and they're still giving $25,000 a year, which is how it works."

According to Matalin, Team 100 members are now giving $25,000 a year and in 1992 will give an additional $100,000. So by the time Bush runs for reelection, donors who stay on Team 100 will have contributed at least $275,000.

Neither Mosbacher nor the RNC would fully disclose the extent to which corporations themselves contributed to Team 100, which, as *The New York Times* noted in an editorial, would "make it easier for the public to see if big donors are rewarded with White House favors." In November 1988, the RNC disclosed about a fifth of its $100,000 contributors.

Then in January 1989, when Mosbacher's Senate confirmation as Commerce secretary was threatened by the refusal to make a full disclosure of the $100,000 donors, the RNC released the Team 100 list. An RNC spokesman said 30 percent of the names on the list represented contributions from corporations, but the party won't say which ones. In other words, it's still not clear, 17 months after the election, whether Frank Lorenzo's $100,000 contribution came out of his own pocket or out of Eastern's corporate coffers.

Using the Federal Election Commission's records and numerous other sources, *Common Cause Magazine* has linked the Team 100 names with their corporate and other business affiliations. In describing Team 100 members' business before the federal government, this story does not distinguish between corporate and personal contributions, except where the RNC has made it clear.

Mosbacher did not answer a list of questions submitted by *Common Cause Magazine* in connection with this story. "The secretary is too busy to respond," says Marci Robinson, a Commerce Department spokeswoman.

THEY'RE BACK

As Team 100 chairman, Mosbacher set out to raise $100,000 contributions from corporations and wealthy individuals, saying he was responding to a similar fundraising drive mounted by Michael Dukakis's finance chairman Robert Farmer. The two men together injected more than $45 million in large private contributions into the 1988 presidential race.

Some question the legality of these fundraising drives. Corporate and labor union contributions have been illegal in federal elections for decades. American Airlines pleaded guilty and was fined in 1973 for its contributions to the Nixon campaign (Spater was not charged because he voluntarily disclosed the corporate contribution). In addition, post-Watergate reforms limited contributions from individuals to $1,000 per election. And those same reforms created a public-financing mechanism for presidential campaigns to prevent the corrupting impact of private money. Bush and Dukakis each received $46.1 million in public funds, as their parties' nominees, and that's all the presidential candidates were supposed to spend.

But the Bush and Dukakis campaigns seized on a way to raise more and get big-money contributors back into the business of helping elect the president. It's called soft money, and the system worked like this: Mosbacher and Farmer, working out of their national parties, raised the $100,000 contributions. The money was directed, reportedly by presidential campaign officials, to party affiliates in states where the presidential contest was expected to be close. From there the money was spent on "ground war" campaign activities, such as get-out-the-vote drives. The soft money windfall also allowed the campaigns to devote their public funds to an expensive "air war" — broadcast advertising.

Critics charge that the soft money system is nothing more than a laundering operation designed to bring illegal federal contributions into federal elections. But Republican Party officials contend that the Team 100 contributions were not for Bush, but for the party. They concede that many Team 100 members are longtime Bush supporters, and naturally contributors wanted to help the party because it would help Bush. But they claim that soft money is aimed at candidates up and down the party's ticket, in theory all the way down to local school board candidates. "It's very clear that people gave money to the party because they support the party, the issues and the candidates," maintains Leslie Goodman, the RNC's press secretary.

But the distinction disappears when fundraisers associated with the presidential campaigns are involved in raising soft money. For example, A.G. "Gus" Spanos, the nation's 16th largest builder, gave $100,000 because "he really liked George Bush and Bush was behind in the polls and he wanted to help him," according to a Spanos spokeswo-

ROBERT MOSBACHER
Chief fundraiser for Team 100
— now Commerce secretary

Almost across the board, members of Team 100 want something from the government.

FRANK LORENZO
Controversial airline operator

UPI/BETTMAN NEWSPHOTOS

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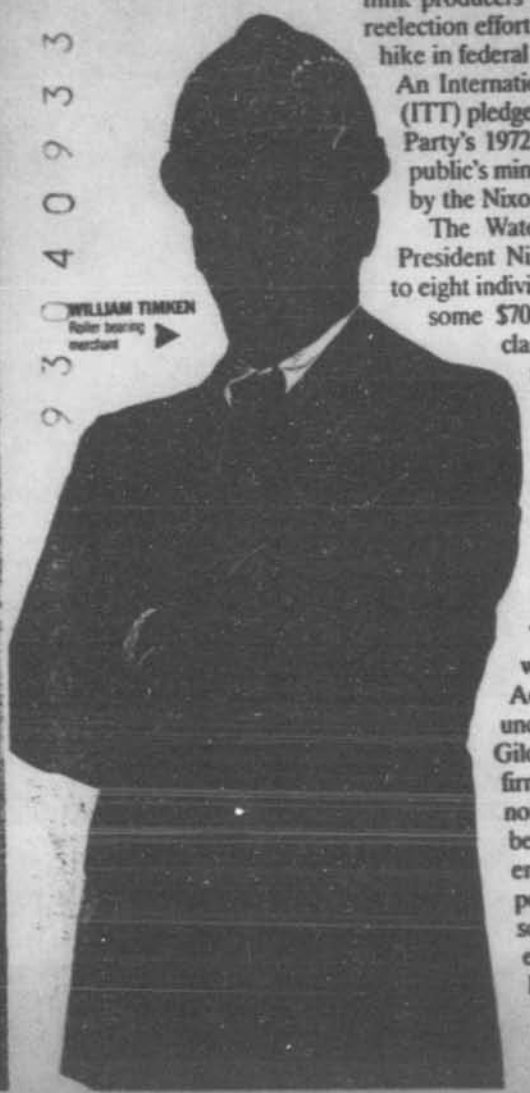
"These are people who are highly successful, who don't *need* to give $100,000 to get access to the president," says a Republican Party spokeswoman.



WILLIAM TIMKEN
Roller bearing merchant

man. The same goes for Thomas Blair, who gave his $100,000 contribution when he was president of Jurgovan & Blair, an employee health benefits management company now called Direct Help. "I thought Bush was the best candidate," Blair says. "I contribute to help candidates win."

Other GOP officials concede the obvious: The soft money system was the way for mega-donors to help Bush. "I can't read the mind of guys who write checks for $100,000," says Keith McNamara, chairman of the Ohio Bush-Quayle campaign in 1988, "but I assume they are not naive or stupid, and I assume they know they could not write a check for $100,000 — or a dollar and a half — to the presidential campaign, but could help build the party, which in turn in its way has to inure to the benefit of the presidential candidate."

THEY DON'T NEED ACCESS

As the Watergate investigation found, CREEP solicited contributions of $100,000 and more from a number of corporate officials and received some $750,000 in illegal contributions from 12 corporations that had business matters pending before the federal government. The milk producers pledged $2 million to Nixon's reelection effort and, it was alleged, received a hike in federal milk price supports as a result. An International Telephone and Telegraph (ITT) pledge of $400,000 to the Republican Party's 1972 convention was linked in the public's mind to a favorable antitrust ruling by the Nixon Justice Department.

The Watergate probe also found that President Nixon awarded ambassadorships to eight individuals who together contributed some $700,000 to CREEP. Nixon declared in a 1974 news conference that "ambassadorships have not been for sale," but that same day Herbert Kalmbach pleaded guilty to promising an ambassador to Trinidad a better post in Europe in return for a $100,000 contribution.

President Bush has awarded ambassadorships to seven Team 100 contributors. Two were criticized by the American Academy of Diplomacy as being unqualified for the posts: Joseph Gildenhorn, who has been confirmed, and Joy Silverman, whose nomination the Senate has rejected because she lacks relevant experience. "Such appointees may well possess qualifications beyond personal wealth or fundraising prowess," Sen. Paul Sarbanes (D-Md.) said during the confirmation hearings of several ambassadorial nominees. "But even when that is true, the appearances are that they *bought* their jobs."

Republican Party officials reject the notion that big donors were trying to buy influence or favors from the White House — or that they would get them.

"I'll tell you the reality of it: It is not buying access," the RNC's Mary Matalin told *Common Cause Magazine*. "You can keep making that argument, and the facts fit it, but it's not the right thing, I'm telling you.

"These are people who in their walks of life are highly successful people who don't *need* to give $100,000 to get access to the president," Matalin says.

"Every week," Matalin continues, "Lee Atwater has a meeting with one of these guys if they're in town. They want to come in and they just move around in these circles. But they don't need Lee, or they don't need anybody to go and see the president. They've got all these high-powered lawyers who lobby for them if they happen to do business with the government. . . . [White House Chief of Staff] John Sununu or [GOP Chairman] Lee Atwater would never let somebody go in to see the president who is going to strong-arm him or something because they're a Team 100 guy. It just does not work that way. It just flat-out doesn't."

David Dorsen, one of the three assistant chief counsels of the Senate Watergate Committee in 1973, says the parallels between 1972 and 1988 are striking.

"In 1988 I think the same material is there for investigation and the perception that there is a quid pro quo exists," Dorsen says. He speculates that "if there were a full-fledged investigation, some really interesting things would turn up."

WHO ARE THEY AND WHAT DO THEY WANT?

One of President Bush's top economic priorities has been to cut the tax on capital gains, profits made when assets such as stocks, bonds and real estate are sold. Under the 1986 tax reform bill, the capital gains tax preference was eliminated in exchange for lower income tax rates for individuals in the top brackets. But before the election, the Reagan administration began to make noises about lowering the capital gains rate again — in effect, undoing the deal — and Bush used the issue as a campaign plank, claiming a cut in the capital gains tax would stimulate new investments.

Bush wants the cuts to be retroactive, benefiting the sale of not only assets purchased after the break takes effect, but assets purchased years ago — undercutting his argument that the goal is to encourage new investments. Tax reform advocate Robert McIntyre, head of Citizens for Tax Justice, says the Bush plan "has a

WIDE WORLD PHOTOS

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lot to do with campaign contributions," adding, "The people who are lobbying for it are the people who are already rich and who make a lot of campaign contributions."

Bush's proposed tax break undoubtedly would provide an avalanche of financial benefits to individuals involved in finance, oil and real estate. These interests are well represented on Team 100.

RISKY BUSINESS — Many of the big names in hostile takeovers, leveraged buyouts, stock buybacks, mergers and acquisitions and other high-risk, big-money deals gave $100,000 to the Republicans, at least $6.6 million all told.

Among the $100,000 contributors are prominent raiders Ronald Perelman and William Belzberg, and leveraged buyout artists like Henry Kravis and George Roberts. Takeover engineers T. Boone Pickens and Meshulam Riklis also made the Team. And so did officials of RJR Nabisco, Beatrice, Occidental Petroleum, Coastal and SCI Holdings, companies for which Drexel Burnham Lambert, the giant bankrupt brokerage house, underwrote high-risk debt during the 1980s.

Team 100 donor Charles H. Keating Jr. also financed dicey deals before the government seized his Lincoln Savings and Loan Association. A target of a $1.1-billion U.S. government fraud and racketeering suit, Keating's thrift underwrote the now-souring broadcast deals of two other mega-raiders on Team 100, Saul Steinberg and George Gillett. Keating also financed $30 million in junk bonds for Lorenzo's takeover of Eastern, which is in bankruptcy.

What do these so-called risk-arbitrageurs want from the Bush administration? "Status quo," Columbia University economics professor Louis Lowenstein says. "What they have in the United States is almost no rules on how the game gets played," and they want to keep it that way.

This community also wants the Bush administration to relax a year-old regulation that is making banks more reluctant to finance big deals, a problem now that junk bonds are an endangered species. Under the new rule, banks must use a standard government definition of risk when reporting how many chancy deals they've financed. Previously banks could themselves define risk, making it easier to gloss over shaky portfolios. The problem is, when risky loans from banks fail, the taxpayers have to bail them out "and there'll be a replay of the savings and loan bailout," Lowenstein predicts.

Billionaire raider Paul Bilzerian gave at least $100,000 to Team 100 at about the time the Securities and Exchange Commission (SEC) was investigating alleged securities fraud by Bilzerian. In December 1988, in a suit brought by the Justice Department, Bilzerian was indicted on 12 counts of securities and tax fraud, conspiracy and making false statements to the government. Edward DeBartolo Jr. and a DeBartolo corporation gave $100,000 and $250,000 respectively. The SEC was also looking into the possibility that DeBartolo's father, Edward Sr., was an accomplice to Bilzerian. DeBartolo Sr. got a deal: Pay back more than $2 million in allegedly illegal profits while neither admitting nor denying guilt. Bilzerian wasn't so fortunate. He is now appealing a four-year prison sentence and a $1.5-million fine.

Team 100 member Bill Belzberg, who gave $100,000, belongs to a Canadian family of corporate raiders that was hit by a 1988 Federal Trade Commission lawsuit charging that they violated federal takeover restrictions in connection with their acquisition of Ashland Oil stock two years earlier. A similar suit was filed against $100,000 donor Donald Trump that year. Both suits were settled the same year.

BLACK GOLD — George Bush made a sizable fortune in the oil industry, and his election effort attracted considerable support from that sector. In all, oil companies or their executives contributed at least $1.7 million to the Bush campaign. Team 100 members include executives of Atlantic Richfield Company, Alkek Oil, Amerada Hess Corp., Fina Oil, Occidental Petroleum, Phillips Petroleum and other oil investors and producers.

A number of oil companies, Occidental in particular, are interested in opening up offshore drilling in California and Florida. For this they have a friend in the Bush cabinet: Interior Secretary Manuel Lujan Jr. Lujan has strongly opposed the current congressional ban on further offshore drilling in those states (see page 30). Assisting the administration in this controversy will be Barry Williamson, appointed by Bush to head an Interior Department office that controls oil and gas leases on the Outer Continental Shelf. He is the son-in-law of $100,000 donor Robert Holt, a Midland, Texas, oilman, rancher and key Bush fundraiser.

With oil imports on the rise and the nation's petroleum reserves unusually low, many oil executives are pushing the Bush administration to call for tax breaks that they say would stimulate domestic drilling. Another item on the industry's wish list is the opening up of Alaska's Arctic National Wildlife Refuge for exploratory drilling.

The nation's seventh-largest oil company, and the one with the greatest stake in the Alaska oil drilling dispute, is Atlantic Richfield Co. In 1988 Arco Chairman Lodwrick M. Cook and President and CEO Robert E. Wycoff together contributed at least $200,000 to the Bush effort. Company spokesman Albert Greenstein says Cook has long been a Republican Party supporter and that he chaired a gala at the Republican Party's 1988 national convention where

Richard Sambol Sambol Construction
Mel Sembler* Sembler Co
Charles Shelton Sr. Shelton Cos
Ed Shelton Shelton Cos
Jeffrey Silverman Fly-Gem Industries
Joy Silverman* wife of above
Donald Smith Jr. Devcon International
Gordon Smith Miller & Smith Inc.
Alex G. Spanos A.G. Spanos Construction
A. Alfred Taubman*** The Taubman Co.
John Tedesco Coastal Group
Kathryn G. Thompson A&C Properties; K.G. Thompson Co
Howard Wilkins Jr.* The Maverick Co.; Maverick Development
Lynn Wolfson Venture W
Joseph Zappala* Zappala & Assoc.

Investors, Bankers and the Super-Rich

Randolph Apley, Michael Timmis Talon
Chris Axentiou Universal Brokerage Corp.
J. Patrick Barrett Carpel Investments
Lee M. Bass Lee M. Bass Inc.
Mr. & Mrs. Robert Bass*** The Robert Bass Group; Bass Brothers Enterprises
Patricia Beck Patricia Beck Enterprises
Bill Belzberg First Financial
Paul Bilzerian Seger Co.
Gerald Blakely Jr. Blakely Waddox Investment
David Brennan Brenlin Group
Raymond Chambers Wesray Capital
E.S. Chester Peoples Bank & Trust
Dee Cook III Goldman Sachs
Edward Cook Cook International
Jack Copeland Copeland Wickersham Wiley & Co.
Trammel Crow Trammel Crow Co.*
J. Morton Davis** DH Blair & Co.; Engex
Marvin Davis*** Davis Companies
Richard D'R. Dowling Hermes Investment
Baldwin Drummond Self-employed investor
Asher Edelman Arbitrage Securities
Lewis Eisenberg Goldman Sachs
William S. Farish W.S. Farish & Co.
Leonard Firestone** Self-employed investor
Arnold & Richard Fisher Fisher Bros.
Max Fisher** Self-employed investor
Joseph Fogg III Morgan Stanley
Nicholas Forstmann Forstmann Little
Theodore Forstmann Forstmann Little
Bradford Freeman Riordan, Freeman & Spogli
W. Grant Gregory Gregory & Hamerneyer
Jim Higgins JDH Enterprises
F. Ross Johnson RJR Nabisco
Robert Wood Johnson IV Johnson Co.
Charles Keating Jr. American Continental
John Kluge Metromedia
Henry Kravis Kohlberg, Kravis, Roberts
Ronald Lauder Lauder Cosmetics
Carl Lindner*** American Financial
Brian Little Forstmann Little
Donald B. Marron Paine Webber
Louis Marx Prospect Group
W.G. Champion Mitchell RJR Nabisco
Peter O'Donnell Self-employed investor
Santo Panzarella St. Paul Capital
Ronald Perelman*** Revlon; MacAndrews & Forbes
Earl Phillips First Factors
T. Boone Pickens Mesa Ltd.
Frank Richardson Wesray Capital
Meshulam Riklis** Rapid American
Thomas Roberts DHI Investments
George Roberts Kohlberg, Kravis, Roberts
David Rockefeller Jr. Chase Manhattan
Stephen Ross Related Cos.
Herman Sarkowsky Sarkowsky Investments
Dudley Schoales Morgan Stanley
Mrs. Dudley Schoales wife of above

CONTINUED

* Ambassadorial nominee
** Also gave to CREEP
*** Also gave $100,000 to the Democrats' soft money fund

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◀ RONALD PERELMAN
LBO artist and billionaire cosmetics mogul

Bush's proposed capital gains tax cut would provide an avalanche of benefits to high rollers on Team 100.

▲ DONALD TRUMP
Manhattan tycoon

more than $2 million was raised.

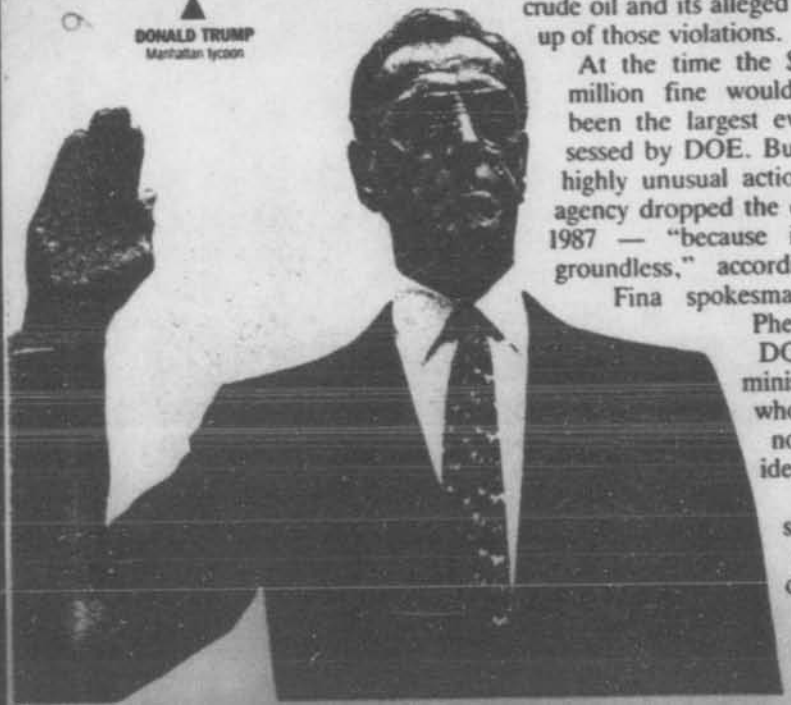
The same year that Arco's top two executives were joining the ranks of Team 100, the Internal Revenue Service notified the company that it owed the government more than $1 billion in allegedly unpaid windfall profits taxes and interest. Arco appealed the claim; the matter is pending.

Arco is also the defendant in an important antitrust case, in which an independent gasoline distributor has charged that Arco violated federal antitrust laws by cutting its prices and thereby bankrupting smaller competitors. The Bush administration has sided with the oil company. When the case was argued before the U.S. Supreme Court last December, the U.S. solicitor general, acting as a "friend of the court," contended that Arco's actions had not violated antitrust laws. A decision on the case is expected soon.

American Petrofina, a Dallas-based oil producer and refiner, has not been a big political contributor, FEC records show. Chairman Paul D. Meek, however, ended up as a Team 100 donor.

Fina Oil had a close and potentially expensive brush with the Department of Energy (DOE) during the 1980s. A 1982 DOE investigation concluded that between 1979 and 1980 Fina had boosted its crude oil prices some $349 million over the amount allowed under federal oil-price controls. DOE and Fina had reached a tentative settlement on that case but, according to government documents leaked to *The Dallas Morning News*, Fina employees later told the DOE that company executives, including Chairman Meek, had known about the oil overcharging scheme and acted to conceal it.

The *News* reported in December 1986 that DOE planned to propose an $841.1-million fine against Fina for its alleged overcharging for crude oil and its alleged cover-up of those violations.



At the time the $841.1-million fine would have been the largest ever assessed by DOE. But, in a highly unusual action, the agency dropped the case in 1987 — "because it was groundless," according to Fina spokesman Bill Phelps. A DOE administrator, who asked not to be identified, would say only that "a decision was made not to [proceed]." But a non-government source familiar with the case said it was dropped against the advice of DOE attorneys.

According to Phelps, Fina Chairman Meek contributed $100,000 in 1988 because Mosbacher, an oil man himself, "said we'd get to be on the winning team." The company had no business or legal matters pending with the government when the company made its contribution, Phelps says.

Occidental Petroleum Corp. did have an oil overcharging case pending before the Department of Energy when, according to the RNC, Paul Hebner, an executive vice president, contributed $100,000 in company funds to the Team 100 effort. In September 1988 the Energy Department proposed a $710-million fine against Occidental for alleged oil-price violations committed by Cities Service Oil and Gas Corp. before it was acquired by Occidental. But in February 1989 DOE announced it had settled with Occidental for a fine of only $150 million, or 21 cents on the dollar.

Three months later Rep. John Dingell (D-Mich.) asked the Energy Department and the General Accounting Office to investigate charges that, when the case was pending in 1988, then-Energy Secretary John Herrington had intervened in the case. Occidental CEO Armand Hammer had requested his help. The inquiries are still pending. Hammer was convicted of violating campaign finance rules during Watergate and was subsequently pardoned by President Reagan.

LAND SHARKS — Real estate moguls, developers and construction companies contributed some $5.8 million to Team 100. In fact one of them, Florida mega-developer Alec Courtelis, currently heads the team now that Mosbacher is U.S. Commerce secretary. Courtelis, himself a $100,000 donor, recently was mentioned in *The Washington Post* as having pushed the Bush administration to appoint a major Democratic fundraiser to the Interstate Commerce Commission to "take him out of the fundraising business."

Two names from the Team 100 list who are into real estate big-time surfaced last year during investigations of the Department of Housing and Urban Development (HUD) for allegedly distributing special favors to friends and political supporters.

According to an internal HUD report, a former acting assistant secretary with the agency arranged to sell the William Lyon Co. 827 acres of rural south Orange County, Calif., real estate in 1985 even after being warned by the HUD general counsel that Lyon's original bid was not the best offer. William "The General" Lyon, a former Air Force pilot and retired two-star general who began building look-alike low-cost homes in the 1950s, got the Robinson Ranch

WIDE WORLD PHOTOS

WIDE WORLD PHOTOS

◀ CHARLES KEATING
Ex-S&L kingpin

property for $16 million after he was allowed to submit a second bid — an opportunity not given to other bidders, the HUD report said. In fact, the land may have been worth as much as $35 million at the time, agency documents show. According to news reports last fall, the company had gross income of $72 million to $97 million from roughly 400 homes sold on the property by then. Since 1983, Lyon and his wife Willa Dean have contributed at least $115,000 to Republican campaigns, and in 1988 his company gave more than $100,000 through Team 100.

Another name to surface in the HUD investigation is that of Stephen M. Ross, president of the Manhattan-based real-estate conglomerate Related Companies Inc. The firm or its subsidiaries have been involved as partners or management agents in more than 100 HUD projects. According to a report in *The Wall Street Journal*, Ross and several other developers received preferential treatment when they got HUD funding for a 316-unit project in Amherst, N.Y.; in addition, a critical waiver of HUD regulations was granted in 1988, saving the developers from losing their $1.8 million annual rent subsidy.

RICH FOOD — Executives of some of the biggest names in agribusiness and food products manufacturing — including Beatrice, Campbell Soup and Quaker Oats — signed up for Team 100. With interests that range from crop supports to ingredient labeling, the food interests are well versed in Washington's workings.

Among these, Dwayne Andreas, CEO and chairman of Archer Daniels Midland Corp., is in a class by himself. The nation's largest food processor, ADM posted $6.8 billion in sales in 1988, much of it from soybean products, corn sweeteners and ethanol — all of which rely heavily on federal subsidies.

Cut from the same cloth as famed globetrotting executive Armand Hammer, Andreas is friend to presidents, congressmen and Soviet leader Mikhail Gorbachev. He's also a $100,000 contributor whose generous donations date back at least as far as the Watergate scandal. Andreas's $25,000 contribution to CREEP, found in the account of a Watergate burglar, helped crack the break-in case. He gave Nixon's campaign a total of $200,000.

If there's any clue to what ADM could get from the Bush administration, consider what it has gotten in the past. ADM controls about 55 percent of the market in ethanol, a corn-based fuel that can be mixed with gasoline. But ethanol is not even remotely cost effective without massive government subsidies, mostly through a two-thirds' exemption from the federal gasoline excise tax.

Several years ago, the drop in oil prices made ethanol less attractive and threatened to put some smaller producers out of business. The government bailed the industry out with $54 million worth of free corn — and ADM took more than half of the subsidy. ADM has also successfully lobbied for tough government restrictions on foreign ethanol imports.

Four years ago the Agriculture Department issued a blunt report saying ethanol production "cannot be justified on economic grounds." But alternative fuels are now on the administration's agenda. "The president is keenly interested in this subject," says Dave Lindahl, head of the Department of Energy's alcohol fuels division. The administration's version of the Clean Air Act reauthorization package called for greater use of alternative fuels. The bill is now being negotiated in Congress. In addition, Bush's Treasury Department has proposed tax credits for ETBE, a new fuel additive made from ethanol. Analyses show the subsidy could cost the government $500 million over the next five years.

As the nation's largest maker of high fructose corn syrup, ADM wants high sugar prices so it can sell its products for just a little less. ADM, in partnership with domestic sugar growers, has repeatedly and successfully lobbied Congress and the White House to block sugar imports — boosting the fortunes of people like Andreas while hurting the economies of some of the same Caribbean nations whose ethanol the U.S. won't accept either.

In soybeans, ADM is more concerned with exports than imports. Several years ago, the American Soybean Association alleged that U.S. producers and exporters of oilseeds were being harmed by European soybean subsidies. U.S. Trade Representative Carla Hills has gone to bat for the industry and in December a panel of the General Agreement on Tariffs and Trade decided in favor of the U.S. No agreement has yet been reached on a remedy, but an end to European Community subsidies "would be greatly significant" for soybean processors like ADM, says Brose McVey, executive vice president of the National Oilseed Processors Association.

BIG DEALS — John McGoff, a controversial former newspaper publisher, gave $100,000 to the Team in 1988 at a time when federal investigators were checking into various aspects of his business dealings.

McGoff became internationally notorious in the late 1970s when he was implicated in a scandal involving top South African government officials who created a multimillion-dollar secret slush fund for an overseas propaganda campaign to bolster their country's image. The affair brought the fall of the South African government in 1978, but not of McGoff.

McGoff was using South African government

continued on page 38

Stephen Schwarzman Blackstone Group
Thomas Spiegel Columbia Savings & Loan Assoc.
Saul Steinberg** Reliance Group Holdings
Jack Stephens Stephens Inc.
Ivan Tillem Pacific Financial
Donald Trump Trump Organization
George Vellessis Franklin Enterprises
Thomas Walker Goldman Sachs
John Whitehead investment banker

Oil

Albert Allbok Alaska Oil
Bruce Calder Oil producer
Lodwrick Cook Atlantic Richfield
Robert Day Freeport-McMoRan; Trust Co. of the West
Michel Halbouty Halbouty Energy
Frederic Hamilton Hamilton Oil
Paul Hoboer Occidental Petroleum
Leon Hess** Amerada Hess
Robert Holt Oil producer
Mary Ralph Lowe Oil investor
Paul Meek American Petrofina
Robert Mosbacher** Mosbacher Energy
William Moss Oil investor
James Paul Coastal Corp.
Chesley Pruet Pruet Drilling
C.J. Silas Phillips Petroleum
Robert Wycoff Atlantic Richfield

Manufacturing

Craig Berkman Synalloy
Donald Bollinger Bollinger Machine Shop
Richard DeVos Amway
Michael Diagman The Henley Group
Delbert Dunmire*** Growth Industries
Bob Gaddy Pace Industries
Stan Gault Rubbermaid
Seymour Graham Kama Corp.
Henry Hillman The Hillman Co.
R.D. Hubbard AFG Industries
James T.Keenan Pace Industries
James F. Keenan Pace Industries
Susan Keenan Pace Industries
John McConnell Worthington Industries
Robert Meyerson Tefron
Ervin Nutter Etaco
William Timken** Timken Co.
Jay Van Andel Amway

Automobiles and Transportation

Bert Boeckmann Gelpin Motors
James Click Jim Click Ford
Peter Cook Mazda Great Lakes
Richard Duchossois Duchossois Enterprises
David T. Fischer, Ken Meade Suburban Motors
Frank Lorenzo Eastern Airlines
W.J. Morvan Central Transportation Centre Inc.
Michael Parkar Parker North American
Roger Penske Sr. Penske Corp.; Hertz Penske
Heinz Prechter American Sunroof
John Rollins** RLC Corp.
Dellord Smith Evergreen Helicopters

Media, Entertainment

Walter Annenberg** Triangle Publications
Mike Cork Cork Communications
Bill Daniels Daniels & Associates

CONTINUED ON PAGE 38 ▶

* Ambassadorial nominee
** Also gave to CREEP
*** Also gave $100,000 to the Democrats' soft money fund

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CONTINUED FROM PAGE 27

Edward Gaylord Oklahoma Publishing
Alan Gerry Cablevision Industries
George Gillett Jr. Gillett Holdings
Wayne Huizenga Blockbuster Entertainment
Donald Jones Star Cablevision
Richard Joutras Bradley Printing
Robert Petersen Petersen Publishing
Roy Speer Home Shopping Network
Burt Sugarman Burris Industries
Jerry Weintraub Weintraub Entertainment
Carl Williams Televents

Politics & Partners

Lawrence Bathgate II Bathgate, Wegener, Wolens & Newman
George Deukmejian Governor of California
Michael Galvin Winston & Strawn
Sen. Ray Goodman NY state senator
Gerald Parsky Gibson Dunn & Crutcher
Nicolas Salgo Ambassador to Hungary
Peter Schabarum LA County Board of Supervisors
Rockwell Schnabel Ambassador to Finland
Sen. John Seymour CalR legislator

Insurance

Thomas Blair Jurgovan and Blair
Eugene Dey Transcapital Finance
Glen Holden Holden Group
John Lindsey Lindsey Insurance Agency
Patrick Ryan AON Corp.
W. Clement Stone** AON Corp.; Combined Insurance
Arlen Williams AL Williams Insurance
Arthur Williams AL Williams Insurance

Miscellaneous

George Abbott Retired businessman
Edwards Addison Southern Co.
Sheldon Adelson*** Interface Group
Peter Blaudt Edsel & Eleanor Ford House
Hushang Ansary Sun Resorts
Ted Arison Carnival Cruise Lines
Sam Banieh Industrial Development Group
Edmond Bayani Retired businessman
Bruce Benson Benson Minerals
John Berry Berry Investments
J. Hoot Blue General Atomic Technologies
Enio de Chiara Business political consultant
Frank DeFrancis Laurel Racing Associates
Richard Farmer Cintas Corp.
Patricia Winsor Hewitt Friendship Farms
Wilhelm Kast DP Corporate Service
Thomas Kershaw The Hampshire House
Mrs. Gorham Knowles Robert Dollar Co. Trust
J.W. Marriott Jr. Marriott Corp.
John McGoff Global Communications
Parker Montgomery Coopervision
Henry O'Neill Evergreen Quality Concessions
Milton Petrie Petrie Stores
David Price American Golf Corp.
Kenneth Rainin Rainin Instrument Co.
Jay Reibel Preferred Health Care
Anthony Soave City Management Corp.
Stanley Tollman Tollman-Hundley Hotels
John Waller Physician
Thomas Watson*** IBM, chairman emeritus
Wheelock Whitney** Minnesota Council on Health
Charles Wyly Sterling Software
Sam Wyly Sterling Software; Michaels Stores

* Ambassadorial nominee
** Also gave to CREEP
*** Also gave $100,000 to the Democrats' soft money fund

TEAM 100, *continued from page 27*

money when he unsuccessfully tried to buy the *Washington Star* in the mid-1970s and then purchased the Sacramento *Union*, said a South African judicial commission. In this country, the Securities and Exchange Commission in 1983 cited him for filing false and misleading statements in connection with some of this activity. McGoff consented to an injunction without admitting or denying guilt.

JOHN McGOFF
Former Michigan publisher and friend of South Africa

But it wasn't until 1986 that the Justice Department got around to criminally charging McGoff with acting as an unregistered foreign agent on behalf of South Africa. This was just a few months after then-Vice President Bush was guest of honor at a fund-raiser for a Republican congressional candidate at McGoff's home and told protesters he knew nothing about McGoff's South African ties.

"The question is, why did it take so long to get authority to indict John McGoff?" says Joseph diGenova, former U.S. attorney for the District of Columbia, who worked on the case. "It's a Byzantine story that many of us would like to know the answer to. . . . The case had a tortured history of review inside the department." In fact, the charges came too late: In December 1986, the case was dismissed because the statute of limitations had expired.

The matter arose again in separate, extensive governmental investigations of the Michigan-based Kinross Manufacturing Corp., in which McGoff's Global Communications Corp. had a 39 percent stake. A participant in the Small Business Administration's contracting program for socially and economically disadvantaged businesspersons, Kinross obtained $22 million in Department of Defense contracts, mostly for making practice grenades.

The Army cited unspecified "problems" with Kinross. But that was just the tip of the iceberg. Kinross was created by some of the same consultants who were involved with the scandal-plagued Wedtech Corp. According to documents obtained by the *Detroit Free Press*, convicted influence peddler E. Robert Wallach was asked by officials of Wedtech to intercede with close friend and former U.S. Attorney General Edwin Meese III on McGoff's behalf in the Justice Department's then-developing case regarding McGoff's South Africa connections. Wallach has denied having done so.

In 1988 and 1989 at least one federal grand jury in Michigan was probing the question of whether Meese hampered Justice's proceedings against McGoff as part of a larger investigation of government influence peddling, according to news reports. Investigators were also reportedly trying to determine whether McGoff, a non-minority, actually controlled the company. The U.S. attorney for the Western District of Michigan says the investigations are still open. Meanwhile Kinross has been kicked out of the SBA's minority program for alleged offenses ranging from mountainous debts to diversions of corporate funds to Kinross officers and others; some of the SBA's charges involve McGoff. At this point Kinross has been investigated by at least four federal agencies and a Senate committee.

HOW MAY I HELP YOU?

As Team 100's quarterback, Robert Mosbacher was the one to call if corporations and wealthy individuals wanted to contribute $100,000 to help the Bush presidential ticket. Now Commerce secretary, Mosbacher is the one to call if corporations want the administration's help in obtaining and expanding valuable overseas markets.

When Mosbacher took the helm at Commerce it was clear that the traditionally dormant facts-and-figures agency would take a more aggressive role. Bush and Mosbacher's personal friendship, spanning three decades, has made him a force to be reckoned with in Bush's cabinet.

At his Senate confirmation hearings, Mosbacher said he would seek closer cooperation between government and industry, that he might push for relaxing antitrust laws and that he would vigorously enforce anti-dumping and countervailing duties laws, which punish unfair market practices by foreign companies that export to the United States.

In the latter case, the Commerce secretary and his political appointees can help out a company simply by deciding to take up an anti-dumping or countervailing duties complaint. A favorable ruling can significantly affect a business's profit margin. Clyde Prestowitz Jr., an assistant secretary of Commerce for economic policy in the Reagan administration, says while the procedures of the Commerce Department are quasi-judicial, the decision to take up an anti-dumping case by its nature has political implications.

"In the sense of, does the White House personnel office or the RNC get a chance to check on it, no, they don't," says Prestowitz. But, he adds, "you have to remember that the secretary of Commerce is a political appointee, as is the assistant secretary of Commerce. And so, in a sense, from the beginning these things are in political hands."

A favorable government ruling in an anti-dumping case is what $100,000 donor William

DETROIT FREE PRESS

Timken has been fighting for since 1986. He owns the Timken Co., inventor and largest American maker of tapered roller bearings, used in manufacturing and heavy machinery. His complaint alleged that seven countries — Japan, Taiwan, Hungary, Romania, Italy, China and Yugoslavia — were unfairly selling tapered roller bearings at below cost.

Anti-dumping disputes are jointly taken up by the Commerce Department's International Trade Administration (ITA) and the independent International Trade Commission (ITC). They determine whether dumping is occurring and if so whether the U.S. company is being injured. If they decide in the company's favor, the ITA then determines how to correct the situation, usually through increased tariffs.

In 1987 Commerce and the ITC ruled in favor of Timken's anti-dumping petition and slapped higher tariffs on roller bearings from the seven countries. Last fall in an appeal filed by Marsuda-Rogers International, a company that imports Hungarian tapered roller bearings, the Court of International Trade agreed with Marsuda-Rogers that Hungarian imports were not hurting the Timken Co. and sent the case back to the ITC. The ITC subsequently changed its ruling on Hungary. Timken is expected to appeal that decision.

A spokesman for Timken would not respond to questions about Timken's Team 100 donation except to say that he has been a longtime Republican supporter. Timken was unavailable for comment.

Motorola is another company with regular business before the Commerce Department. Michael Galvin, whose father, Robert, owns the multibillion-dollar electronics firm, gave $100,000; Galvin Jr. has been nominated for and is serving in the choice post of assistant Commerce secretary for export administration, awaiting confirmation by the Senate. In this role, Galvin helps formulate policy on U.S. exports, technology transfers to other nations and, perhaps most important, product licensing for the $70 billion export market. Galvin has said he will recuse himself from any decisions affecting Motorola.

The Bush administration has alleged that Japan is not abiding by telecommunications trade agreements, an action that could lead to U.S. retaliation against Japan. A prime beneficiary of such action would be Motorola, according to *The Wall Street Journal*. Motorola CEO Robert Galvin was one of a handful of businessmen invited to go with Mosbacher and other high-level officials on a mission to Poland to explore investment opportunities there.

A spokesman for Motorola would not comment on Michael Galvin's role at Commerce, saying only that "he was never a Motorola employee."

BIG MONEY RETURNS

CREEP's fundraising in 1972 created the perception that big donors were in the position to receive special government favors engineered by the Nixon White House. It took a full-scale probe complete with subpoenas, lawsuits, interviews under oath and a review of corporate and personal records in order to determine whether favors were granted to big donors. The Watergate prosecution task force looked at Justice Department actions in antitrust matters, Environmental Protection Agency decisions in enforcement proceedings, the handling of criminal prosecutions, the awarding of bank charters, rulings on airline routes and mergers, determinations on product safety standards, the setting of oil import allocations and other government actions.

David Dorsen, the Watergate Committee assistant chief counsel, says there is again a widespread perception that big money wields tremendous clout. Contributors are assumed to want something in return, he says, and any government help they do get looks odd.

"The perception of a quid pro quo is a very serious matter because it undermines faith in the democracy, faith in the even-handedness of justice and equal opportunity," Dorsen says. "Even if there is no specific quid pro quo, the kind of things that have happened in terms of payments, campaign contributions and then rewards, even if they are fortuitous — which frankly is hard to believe — undermines confidence in the federal government." ♦

MESHAM MALTCHAYAN

CARL LINDNER
Millionaire banking and insurance mogul ▶

NO QUESTIONS ASKED

Team 100 fundraisers were admittedly undiscriminating. "There is no screening process for good money versus bad money," says Republican National Committee press secretary Leslie Goodman. "That would be quite a violation of civil rights if you think about it." Among the donors with colorful pasts:

- **Jose "Pepe" Fanjul**: Osceola Farms Co., of which Fanjul is president, in 1986 agreed to an $85,000 settlement of EPA-alleged violations of the Clean Air Act. In 1988 the firm was fined another $55,000 for not meeting all the requirements of the settlement agreement.
- **Albert B. Alkek**: Pleaded guilty in 1979 to failing to report an illegal oil-pricing scheme. Drew a $3.24-million fine, which the U.S. attorney allowed Alkek to write off as a business loss on his income taxes. Granted a pardon by President Reagan.
- **Dwayne Andreas**: Archer Daniels Midland Corp., of which Andreas is chairman and CEO, pleaded no contest in 1978 to price-fixing charges and paid $200,000 in criminal penalties in connection with sale of grain to the Food for Peace program.
- **Paul Bilzerian**: Under investigation in 1988 for securities fraud, he has been convicted and sentenced to four years in prison and fined $1.5 million, the stiffest penalty to come out of the SEC's crackdown on Wall Street. He has appealed the decision.
- **Carl Lindner and Charles Keating**: In 1979 the Securities and Exchange Commission charged Lindner and Keating with violating anti-fraud and anti-manipulation laws in connection with activities by Lindner's American Financial Corp., where Keating had been an officer and a director. The allegations involved fraudulently diverting corporate assets to personal use. Both men signed consent agreements in which they neither admitted nor denied guilt. Keating is currently the target of a $1.1-billion government lawsuit charging, among other things, that he diverted funds from Lincoln Savings & Loan to fund his "personal, political and charitable convictions."

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DIGEST OF QUOTATIONS PERTAINING TO FEDERAL ELECTIONS CAMPAIGN ACT OF 1974

01/31/73 -- **The Wall Street Journal**, p. 1
Title: A Campaign Spending Bill Strictly Limiting Donations Cleared The Senate

Quote: No one could give more than $3,000 in any contest; anything over $50 couldn't be in cash; **an individual's total donations to federal candidates in a year couldn't exceed $25,000.**

10/25/73 -- **The Wall Street Journal**, p. 24
Title: The Need to Curb Dollar Politics

Quote: A start was made nonetheless during the summer when the Senate passed the first bill in American history putting a ceiling on individual or political committee contributions to presidential and congressional candidates ($50 cash, $3,000 in cash and checks, and **a $25,000 limit to contributions for all candidates in one year.**)

11/06/73 -- **The Wall Street Journal**, p. 1
Title: Watergate Ripple

Quote: **Under the Senate measure, a person's gifts in any calendar year couldn't exceed $25,000 to all candidates.**

01/02/75 -- **The New York Times**, p. 27
Title: Major Campaign Reforms Take Effect

Quote: **Beginning today, individuals are limited to overall contributions of $25,000 in a single year** and no more than $3,000 to an individual candidate -- $1,000 each in the primaries, a runoff, and the general election.

08/25/75 -- **The Wall Street Journal**, p. 5
Title: Firms' Worker-Financed Political Funds Are Expected to Multiply Under New Law

Quote: **The combination of all gifts couldn't top the individual's maximum limit of $25,000 a year.**

10/07/75 -- **The Los Angeles Times**, p. 1
Title: Justices Will Rule on Campaign Laws

Quote: Under the law, individuals would be able to contribute no more than $1,000 to a candidate in any one campaign and **no more than $25,000 to all political hopefuls in one calendar year.**

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01/31/76 -- **The Washington Post**, p. A1
Title: Spending Limits Struck Down

Quote: The difference, said the court, is that limits on contributions -- $1,000 per individual for each candidate, $5,000 for political organizations and committees and a **$25,000 limit for all political giving by an individual in any one year** -- are less direct and less serious restrictions than the limits on expenditures.

01/31/76 -- **The Los Angeles Times**, Part 1 p. 1
Title: Justices Void Key Election Money Curbs

Quote: The court split, 6 to 2, in upholding the law's contribution limits, which permit an individual to contribute no more than $1,000 to a candidate in any one campaign and **no more than $25,000 in one calendar year.**

02/07/76 -- **Facts on File World News Digest**, p. 86
Title: Election Law Upheld on Public Financing and Disclosure; Spending Limits and FEC Voided

Quote: The court thus struck down several provisions of the campaign law: the ceilings on expenditures by congressional candidates in their campaigns; the $1,000 a year limit on expenditures by an individual in independent efforts for or against a specific candidate **(and the $25,000 limit on all such expenditures by an individual in a year)**, and the ceilings on campaign spending (from either their own, or contributed funds) by presidential candidates who did not accept federal subsidies.

05/29/76 -- **The New York Times**, p. 8
Title: Vote Panel Issues Warning Gifts

Quote: The commission also reported in the statement that **no individual could donate a total of more than $25,000 a year to political committees**, even if some or all of them were conducting unlimited independent campaigns.

08/09/76 -- **U.S. News & World Report**, p. 61
Title: A Complicated Set of Rules Limits How Much You Can Contribute to Campaigns of Candidates for Federal Offices

Quote: **You can give a grand total of $25,000 a year to federal candidates and political committees.**

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04/01/77 -- **Common Cause Frontline**, v. 3, n. 2; p. 7

Title: Report to the American People on the Financing of Congressional Election Campaigns

Quote: **Individuals may give no more than a total of $25,000 to all federal candidates in any calendar year.**

05/29/78 -- **U.S. News & World Report**, p. 79

Title: Politicians Strike a New Bonanza

Quote: They note that individual contributors are limited by law to $5,000 a year per individual campaign or PAC plus $1,000 per election for an individual candidate and **$25,000 total each year**

12/18/79 -- **The Associated Press**, PM Cycle

Quote: He [Eugene McCarthy] said future suits will seek to ban contributions limits for all challenging candidates and minority parties, **to remove the $25,000 annual ceiling on campaign contributions by individuals**, ...

09/01/83 -- **Common Cause Magazine**, p. 33

Title: Beyond Watergate

Quote: **Between candidates, political parties and PAC's, individuals are now limited in their annual giving to a total of $25,000.**

05/05/84 -- **National Journal**, v. 16, n. 18; p. 873

Title: Another Campaign, Another Loophole

Quote: It added, however, that contributions to delegates could come only from authorized sources -- for example, from PACs but not from corporation or labor union treasuries -- **and that they were chargeable against an individual donor's $25,000 annual contribution limit.**

07/21/84 -- **National Journal**, p.5

Title: The Democratic Party's 'Fat Cats' Are Back

Quote: Although **the campaign law specifically limits individuals to contributing a maximum of $25,000 per year** to all federal candidates and political committees, the commissions's ruling circumvented the law the agency is supposed to enforce.

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09/01/84 -- **National Journal**, v. 16, n. 35; p. 1618
Title: Republicans and Democrats battling to Raise Big Bucks for Voter Drives

Quote: **Such contributions are limited to individuals and qualified PACs and count against the $25,000 annual federal spending limit for individuals.**

Like corporate and union treasury funds, any contributions made in excess of an **individual's $25,000 yearly federal limit** will be ineligible for use in the DNC's presidential and state parties' federal accounts.

11/12/85 -- **Daily Report For Executives**, No. 218; p. A-7
Title: Witnesses Call on Congress to Expand FEC's Powers, Curtail Major Party Donations

Quote: For example, McGarry said, because of 'shortcomings' in its computer data base, **the agency is not possible to monitor the $25,000 overall annual contribution limit on individuals** unless violations ar brought to FEC's attention.

02/02/87 -- **Legal Times**, p. 11
Title: Court Erases Ban on Political Spending By Advocacy Group

Quote: The plain language of the statute would suggest that an individual may give more than $5,000 in political contributions to a non-profit corportaion, as long as the corporation is not a political committee, **but may not exceed the $25,000 annual limit on total political contributions.**

11/15/90 -- **1990 State News Service**
Quote: The complaint, filed Nov. 1, charges the seven with violating the Federal Election Campaign Act, **which forbids individuals from giving aggregate amounts of more the $25,000 to political candidates in a calendar year.**

ARTICLES SPECIFICALLY STATE AN ANNUAL $25,000 LIMIT
COVERS 01/31/73 - 11/27/90

9304093337900

ADM

INTER-OFFICE LETTER

TO: Dwayne Andreas

DATE: November 26, 1990

FROM: Teresa A. Moore, Library

Enclosed are the Federal Election Campaign Act articles you requested. The articles in this stack state the $25,000.00 as an annual limit.

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THE WALL STREET JOURNAL

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EASTERN EDITION — TUESDAY, JULY 31, 1973

What's News—

ss and Finance

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selling all 23 of its U.S.
individual investors "to
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other New York Stock
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World-Wide

HALDEMAN SAID TAPES of Nixon's conversations dispute Dean's testimony.

H. R. Haldeman, who resigned April 30 as President Nixon's chief of staff, began his testimony before the Senate Watergate committee by saying he had recently reviewed the tapes the panel wants to see. They don't back up former White House Counsel John Dean's version of September 1972 and March 1973 meetings with Nixon, he said. Haldeman, reading a prepared statement, said neither he nor Nixon knew of the burglary of the Democratic National Committee's headquarters or of any attempt to hide the truth about it.

Earlier, former White House domestic aide John Ehrlichman ended his five days of testimony in a session spiced by caustic exchanges with chief counsel Samuel Dash.

• • •

A CAMPAIGN SPENDING BILL strictly limiting donations cleared the Senate.

Obviously mindful of the Watergate scandal and its tales of loosely controlled outlays of election cash, the Senate by an 82-to-8 vote clamped tight restrictions on both contributions and candidate spending. No one could give more than $3,000 in any contest; anything over $50 couldn't be in cash; an individual's total donations to federal candidates in a year couldn't exceed $25,000. On the spending side, candidates couldn't lay out more than 10 cents a voter in primaries or 15 cents a voter in general elections.

There has been little push in the House for a bill as tough as the Senate's. And some have criticized the Senate bill as too complex, possibly even unconstitutional.

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It Just Looks L
And It's the
But Not Eve

By Leslie
Staff Reporter of The Wa

NEW YORK—Women
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more than underwear.

At least, some women
"I don't like it. It w
Diane Von Furstenberg,
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The Need to Curb Dollar Politics

By Robert M. Kaufman

A glorious opportunity lies waiting for the businessmen throughout the country who contributed, willingly or otherwise, to the 1972 election campaign.

The same businessmen who came up with the bulk of nearly $100 million raised for presidential candidates in the last election may be the only group with enough clout to see that it never happens again—that meaningful reform of election financing is enacted while the country is in the mood for it.

These big businessmen and many not-so-big businessmen for years have contributed either from a sense of duty to support the party or the candidate they felt would do the country the most good, or out of fear. To the average businessman, government decisions are an ever-increasing factor in the earnings performance of his company. A phone call from a fund-raiser known to represent powerful political forces is a mighty hard thing to ignore.

But the reputation of the business community as a whole has unquestionably been tarnished by the actions of a sizable minority who have made contributions seeking direct political influence in matters affecting their business interests. The $200,000 Vesco contribution and the contributions by the dairymen's funds and by Howard Hughes appear to have such motivations. And it is hard to believe any other explanation for the actions of the seven major corporations that broke the law by making contributions totaling half a million dollars to the Nixon fund.

A New Chance

The great majority of businessmen who want to clear the name of business in politics after these excesses have their chance to do so in the present Congress. There is increasing evidence that without some urging from the businessmen who contributed to their election, congressional leaders may twiddle their thumbs for quite some time. After all, many incumbents are counting on heavy financial support in congressional elections coming up next year.

The Common Cause study of congressional campaign spending has shown that, like the President, the incumbent Congressmen raised a record amount of money in the last campaign (about $325,000 for the average Senator, and $60,000 for the average Representative—in both cases about double the amount raised by their challengers). To ask people who are supported that well by the system to take the initiative in tearing down the system is asking quite a lot.

A start was made nonetheless during the summer when the Senate passed the first bill in American history putting a ceiling on individual or political committee contributions to presidential and congressional candidates ($50 cash, $3,000 in cash and checks, and a $25,000 limit to contributions for all candidates in one year). While this bill has some flaws, it would be a big step forward.

A companion bill passed by the Senate would create a new Commission on Federal Election Reform to study more fundamental changes in law with respect to more basic issues such as the philosophy of campaign financing, tax laws applicable to campaign financing, nomination procedures and even the length of the terms of federal officials.

The trouble with long-term solutions to campaign financing reform is that if we put limits on campaign contributions, which is such a simple thing to do, we must immediately find some alternative way to raise money for election campaigns. It would certainly be impossible to run a presidential campaign in 1976 without again tapping huge sums from the business community unless an alternative is found.

The currently favored alternative is federal subsidizing of election campaigns. This idea is embodied in a bill sponsored by Representatives Udall and Anderson in the House, under which the Treasury would match the first $50 of private contributions, which would be limited to $1,000 for congressional candidates and $3,000 for presidential candidates.

The idea of such federal subsidizing of election spending has drawn mixed reactions in the business community, according to a recent Chamber of Commerce survey. This is scarcely surprising in the light of the business community's traditional resistance to further intrusion of federal power in areas where business is accustomed to enjoying the freedom to look after its interests. One can only hope that the abuses of that freedom by a significant minority will dampen the enthusiasm of the great majority of businessmen for playing their chips in the political world on the scale they did in 1972.

The immediate and important problem is that there is no sign that the House will act quickly, either on limiting contributions or on finding an alternative. House Administration Committee Chairman Wayne L. Hays of Ohio is presently proceeding at a pace which belies no sense of the urgency of the problem. Yet, unless action on these bills is taken promptly, the problems that faced the business community in the 1972 presidential campaign will be repeated all over again in the 1974 congressional campaign.

That is why the businessmen who are and will otherwise continue to be the chief targets of political fund raisers have every reason to be concerned with this problem. As the parties most likely to be affected, they should enter actively into the discussion of this legislation that would both limit their ability to influence future elections and substitute other sources of funds for such purposes.

Anticipate the Future

Reform of campaign financing is another one of those public issues—like equal opportunity and pollution—that will backfire on the business community if it is too myopic to anticipate the future. There can be no doubt that the black eyes that businessmen got as the abused victims of fund-raisers in the excesses of the last presidential campaign did harm to the image of business in general with the public.

Watergate and other recent disclosures taught us all a lesson about the corruptibility of ordinary mortals—a lesson that apparently has to be repeated at least once every generation. Since human nature is unchanging, the best thing for the nation to turn its attention to is changing the system that makes corruption so easy in a society where so many have so much money to throw around for such purposes.

Business leadership in getting this job done would go a long way towards clearing the bad reputation business has acquired from the sequence of shabby misdeeds that has come to light in the aftermath of Watergate. It will be fascinating to see whether business has the foresight to wield its power for reform before getting itself trapped again in the conditions that led to the abuses of the 1972 election.

Mr. Kaufman is chairman of the Special Committee on Campaign Expenditures, of the Association of the Bar of the City of New York.

Who Really Discovered the North Pole?

By Edmund Fuller

What a mercy it is that the first landings of men on the moon were seen and heard live around the world and that the courses of our spacecraft were verifiable by observatories in many countries. Otherwise, given the atmosphere of space race that long prevailed, one shudders to imagine the aftermath of an American expedition returning from the skies with the announcement, supported by little hard data, that it had landed on the moon. Or, The physical appearance of his diary raised suspicions that it was fake. Inconsistencies between Matthew Henson's first published accounts of the journey and the captain's tend to reinforce the other objections to the claim. Peary also "borrowed" 110 photographs taken by Henson, which were never returned or seen again. From shadows cast in those, the altitude of the sun at the alleged pole might have been determined.

In contrast, Hugh Eames thinks that both lor of those around them and of the public at large, are fascinating as drama.

To both men, fame was the spur, but with Peary it was an obsession, asserted over years in letters to his mother: "I must be the peer or superior of those about me to be comfortable. . . . I shall not be satisfied . . . until my name is known from one end of the world to the other. . . . Remember, Mother, I *must* have fame." He was jealous of sharing it, and among other instances, the subtle com-

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Wall Street Journal Nov 6, 1973

Watergate Ripple

Scandals Give Impetus To New State Laws On Campaign Funding

7 States Have Acted in '73, Trying to Close Loopholes; Agnew's Maryland Is One

Protection of Incumbents?

By URBAN C. LEHNER
Staff Reporter of THE WALL STREET JOURNAL

Until recently, John Bishop Jr. was *persona non grata* among his colleagues in the Maryland senate. Normally something of a maverick anyway, Mr. Bishop, a Republican from the Baltimore suburb of Towson, compounded his problems last year by attacking some influential fellow legislators.

"The word went around to kill all of Bishop's bills," Mr. Bishop relates. "And they did. Every damn one of them. Every one. And I came out with my tail dragging last year."

Then Mr. Bishop's luck improved. In five previous sessions, he had tried—and failed—to push through legislation requiring more disclosure of contributions to election campaigns. This time, two of his disclosure proposals sailed through practically unopposed.

What did it, he says, was the combined impact of the Watergate affair and reports of election-funding irregularities in state and local campaigns in Maryland. (The laws were enacted before disclosure of the troubles of former Vice President Spiro Agnew of Maryland.) "People were afraid to speak against these measures," Mr. Bishop says gleefully.

Hawaii to New Jersey

Tougher campaign-finance laws are becoming an unanticipated side-effect of Watergate in a lot of places, and Mr. Agnew's conviction on an income-tax-evasion charge stemming from contributions is likely to intensify the trend. Already this year, measures designed to close loopholes in old laws have been enacted in New Jersey, Hawaii, Florida, Texas, California and Nevada as well as Maryland. Other states—including Pennsylvania, Michigan, Ohio and Massachusetts—are debating proposals with similar aims. In Illinois, the largest of nine states with no laws on campaign funding, a stringent bill went further than in previous sessions, passing the House before dying in the Senate.

"People are asking questions about the ways in which we finance politics," says Herbert E. Alexander, director of Citizens Research Foundation, a private group in Princeton, N.J., that keeps track of political funding. "There are a lot of states in which there's ferment, in which bills are being introduced and are being taken seriously—in some places for the first time."

Lawmakers say that some changes would have come eventually even without this year's political scandals, because of growing public concern over the high cost of campaigning and the prominence of millionaire politicians. Purely local situations spawned some moves.

Casinos in Nevada

In Nevada, says one state senator, fear of increasing dependence on the casino industry for campaign money was "the unexpressed premise" of a new law limiting spending by legislative contestants to $15,000, or 50 cents for each vote tallied by the winner of the previous election, whichever is higher.

But lawmakers and other observers agree

What's Nev

Business and Finance

NEW-CAR SALES last month slowed 12% on a daily-rate basis to 976,070 units, convincing analysts that the long-awaited downturn has begun. Domestic models' sales fell 11% to 857,070 units, while import sales dropped 15% to 119,000 cars.
(Story on Page 3)

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General Motors declared a year-end dividend of $2.35 a share, its largest such payment since a three-for one stock split in 1955. That brought its 1973 payout to $5.25 a share, up from 1972's $4.45 a share.
(Story on Page 3)

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Ford and Chrysler warned that catalytic converters needed to meet 1975-model auto-emission standards threaten fuel and, perhaps, health penalties. Their arguments at the first day of Senate Public Works Committee hearings seemed to stir little support.
(Story on Page 11)

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U.S. Steel raised prices of sheet and strip products, effective Jan. 1, and eliminated an intermediate-grade of cold-rolled sheet. Its action, following over three weeks of study, thus ratifies a pattern set by Bethlehem Steel, although U.S. Steel appears to have added three products to the move.
(Story on Page 2)

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Interest rates rose sharply yesterday in the money market after the Treasury announced plans to offer $1.2 billion more short-term bills, including a $1.1 billion "strip" offering.
(Story on Page 31)

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Trans World Airlines halted all domestic and international flights after it was struck by nearly 5,100 U.S.-based flight attendants. TWA said most customers were being accommodated by competitors, but some of these lines said the jet-fuel shortage prevented them from adding any flights.
(Story on Page 4)

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The stock market continued its sharp and broad retreat yesterday in moderately active trading; uncertainties over the energy crisis and governmental leadership were cited. The Dow Jones industrial average dropped 15.88 points to 919.40, following a 51.78-point plunge last week.
(Story on Page 43)

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Shumate & Co. was rebuffed in its $4.5 million antitrust complaint seeking, in effect, permission for New York and American Stock Exchange members to trade listed securities over the counter with nonmembers. A judge issued a directed verdict against the small broker-dealer.
(Story on Page 6)

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[illegible] election, whichever is higher.

...ful lawmakers and other observers agree ... Watergate disclosures of "laundered" money, influence peddling, evasion and cover-up have spotlighted local abuses that might otherwise have been shrugged off. The attention has speeded enactment of new laws and forced more sweeping changes than might have gone through later, they say.

New Jersey's new statute, for example, specifies criminal penalties for willful violators. Legislators say they were "stampeded" into acting by Watergate and by scandals growing out of Gov. William Cahill's 1969 campaign. In Texas, observers say the conviction of high state officials on stock manipulation charges "put the legislature on good behavior," smoothing the way for a new disclosure law. And in Hawaii, a newspaper series linking campaign money and preferential legislative treatment sparked that state's new statute.

Lobbyists in Florida

A series of articles in The Miami Herald earlier this year detailed how in 1972, lobbyists gave half of the $2.7 million in campaign money received by candidates for the Florida legislature. As a result, the legislators passed a stiff new measure providing for limits on spending, for detailed disclosure and for an independent elections commission with enforcement powers.

The stakes involved in state campaign funding aren't small. Last year, candidates for 500,000 state and local offices accounted for roughly 50% of the estimated $400 million spent on all elections. The price tag for one race can range from a few hundred dollars to the $7 million Nelson Rockefeller spent running for his fourth term as New York's governor in 1970. In the recent mayoral match-up in Los Angeles, it cost Thomas Bradley $1.2 million to knock off incumbent Sam Yorty, who doled out $1 million going down to defeat.

In 1971 Congress passed the Federal Election Campaign Act, which limits media spending and requires fuller disclosure of gifts in elections for federal office. Now Congress is taking another look at campaign funding. A measure that the Senate passed last July by an 82-to-8 vote and a bill introduced in the House are being considered by a House subcommittee.

$25,000 Limit

Under the Senate measure, a person's gifts in any calendar year couldn't exceed $25,000 to all candidates. The limit to any one candidate would be $3,000 per primary or general election. The House measure contemplates even more stringent limits, and provides for public financing in the form of matching grants designed to encourage small contributions -a private contribution of $50 or $100 to a candidate would be matched with federal money while a larger gift wouldn't.

Advocates of revision say change is needed even more at the state level. "Lobbyist contributions are a much larger percentage of overall gifts to state candidates than they are to congressional," asserts Thomas Belford, field

Please Turn to Page 17, Column 1

(Story on Page 6)

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Occidental Petroleum brou[ght] Joseph E. Baird, a 39-year-old in[dus]tional banker, as president and operating officer. He replaces D[ar]mand Hammer, 75, who continu[es] chairman and chief executive.

(Story on Page 18)

• • •

Wonder Bread ads falsely in[di]that the product is an unusually [nu]tious food that produces dra[ma]growth in children, the Federal [Trade] Commission ruled. But it dismisse[d] rest of a 1971 complaint chargin[g] Continental Baking, an Interna[tional] Telephone unit, with making num[erous] false nutritional claims for W[onder] Bread and Hostess cakes.

(Story on Page 7)

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A key tax question—whether [com]panies that use their own gear in l[easing] ing plants and other facilities [can] write off such use as a currentl[y de]ductible expense or whether it mu[st be] capitalized—will be decided by th[e Su]preme Court.

(Story on Page 8)

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General Electric was given [a] million contract for a high-voltag[e di]rect-current transmission system [the] first such system to be built in the [U.S.] since the mid-1960s. The award is [from] Square Butte Electric Cooperative.

(Story on Page 10)

• • •

Lockheed Aircraft received a $[...] million addition to a Navy contra[ct] 45 S3A antisubmarine-warfare pl[anes]

(Story on Page 5)

• • •

Over $5 billion in bond issue[s] state and local governments will b[e] cided by voters today. About 80[%] volve transportation systems in [the] states—$3.5 billion in New York [and] $500 million in West Virginia.

(Story on Page 35)

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Markets—

Stocks — Volume 17,150,000 shares Jones Industrials 919.40, off 15.88; tran[sp]tion 176.73, off 3.28; utilities 97.78; off 0.60

Bonds Dow Jones 40 bonds 72.92, o[ff]

Commodities — Dow Jones futures 282.08, up 8; spot index 301.41; up 5.41.

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Watergate Ripple: Scandals Give Impetus to Campaign-Fund Laws

Continued From First Page

representative of Common Cause, a group advocating new laws. "These guys just don't have the prestige and visibility to raise money from other sources."

Trying to clean up election campaigns was an American pastime before baseball parks started selling hot dogs and beer. In 1867, Congress acted to protect civil servants from political "assessments"; the protection was broadened in 1883. Other state and federal laws enacted over the years ban contributions by companies and labor unions, require disclosure of gifts, and place some mostly unenforceable or unenforced ceilings on contributions.

Before it was beefed up this year, Florida's 20-year-old "Who-Gave-It, Who-Got-It" law was considered a model state statute although it had flaws. Like the new Florida law, also considered a prototype, it had provisions for disclosure and for spending ceilings. However, no one was specifically given the task of enforcing them, and disclosure was required from candidates only.

In fact, the Florida House Elections Committee determined in 1970 that ex-Gov. Claude R. Kirk Jr. didn't have to report the $500-a-year dues that members paid to belong to his "Governor's Club" because the money wasn't given to him as a candidate. Mr. Kirk used part of the proceeds to rent a jet airplane, according to testimony before the committee.

Laws in other states were similarly flawed. A Philadelphia newspaper editorialized recently that Pennsylvania's act is "a pattern of loopholes surrounded by a shell of good intentions." To call Michigan's law a disclosure act, a Detroit Free Press political columnist wrote last year, "is to say war is peace."

One of the new Maryland measures prevents supporters from avoiding disclosure by buying tickets to fund-raising dinners rather than making direct gifts, a common loophole in many states. The other Maryland act requires corporations doing $10,000 annual business with the state to disclose their contributions (Maryland is one of 16 states allowing firms to give). They must also enumerate their dealings with the state in detail. Since the law requires disclosure regardless of whether an election is in progress, it takes away from corporations the ploy of avoiding disclosure by giving to politicians who aren't yet officially "candidates."

Critics fear that spending-limitation laws could turn into little more than "incumbent protection" measures. They theorize that entrenched officeholders don't need to spend large sums to make themselves known, but challengers straining to unseat them do.

Pennsylvania's proposed new law galls some critics. In 1966, Philadelphia industrialist Milton J. Shapp shelled out $3.4 million of his own money in a losing bid to become Pennsylvania's governor. In 1970 he rolled into the governor's mansion with a 500,000-vote margin while spending $2.7 million. Now, Gov. Shapp, who is expected to run for reelection next year, wants a spending ceiling.

The law he supports would limit spending to 50% of the salary of the office sought plus 15 cents for each voting-age citizen in the relevant territory or district. For gubernatorial candidates, it would work out to a ceiling of $1.2 million.

But Mr. Shapp's aides say he isn't trying to protect himself from the kind of blitzkrieg he launched in 1966 and 1970. Rather, they say, he wants to prevent politics from becoming the exclusive preserve of independently wealthy candidates. The governor's "philosophical feeling," according to one adviser, is "that money shouldn't be the only factor in getting people elected."

Critics also worry about the constitutionality of spending-limitation laws. If you can't spend to get your message across, your freedom of speech has been abridged, they reason.

One obvious problem is what to do about expenditures by "independent" individuals and committees in the candidate's behalf. The dilemma, political scientists say, is this: Unless the candidate is held responsible for such expenditures, they could be used to evade the intent of spending-limitation laws; but if the candidate can block expenditures by genuinely independent individuals and committees, he in effect is empowered to squelch their freedom of speech. The 1971 federal law, with its ceilings on media spending, has been challenged on just those grounds.

Government subsidies for campaigns have been suggested as one way of freeing politicians from the grasp of special-interest groups. But they may not prove very popular with the voters, observes Mr. Alexander, the election funding expert. He says:

"At a time when taxes are high, and they're talking about cutting out welfare programs, they're cutting out the health program or that education program, here along come the politicians and they enact legislation to provide their campaign with the wherewithal. You know, people may not take too kindly to that."

Dearborn-Storm Adds Six New Directors

By a WALL STREET JOURNAL Staff Reporter

CHICAGO — Dearborn-Storm Corp. expanded its board to 18 members from 10, said it will move its corporate headquarters to Houston and indicated it is getting out of the computer-leasing business.

The company said a special committee was appointed to consider the sale, spin-off or retention of its computer-leasing operations. Earlier this year, Dearborn-Storm said it was accelerating depreciation on its International Business Machines Corp. 360 computers because of marketing risks.

In addition, the company said it is considering further enlarging its fleet of offshore-drilling rigs.

The company will move to Houston "sometime" in 1974 because of the increasing importance of its petroleum business, it said.

Dearborn-Storm said six new directors were elected Nov. 1 as the result of the acquisition of 40% of its common by Trafalgar House Investments Ltd. They are: Nigel Broacks, 39 years old, chairman of Trafalgar; E. W. Parker, 43, Trafalgar deputy managing director; N. S. Thompson, managing director of Trafalgar's Cunnard Steamship Co. unit; George Williams, 55, managing director of Trafalgar Offshore Ltd.; D. J. C. Berens, Trafalgar group investment manager, and Elmer Johnson, 42, a partner in the Chicago law firm of Kirkland & Ellis.

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Major Campaign Reforms Take Effect

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WASHINGTON, Jan. 1 (UPI) —The most sweeping political campaign reforms in the nation's history took effect today.

The changes, a direct result of Watergate, are considered certain to revolutionize campaigns for Federal office.

The law already faces a court challenge, and revisions may be attempted by the 94th Congress.

Senator James L. Buckley, Conservative - Republican of New York, and former Senator Eugene J. McCarthy, Democrat of Minnesota, have joined in a suit challenging parts of the law on constitutional grounds contending that insufficient provisions were made for minority parties.

Some members of Congress want to broaden the law by providing taxpayers' financing of Congressional elections and repealing the "equal time" provision that forces broadcasters to give time to all candidates for an office if they give it to one.

Limit on Contributions

The law, which President Ford signed with reservations, provides for public financing of Presidential elections, primaries and national conventions; a limit on political contributions, and ceilings on candidate spending.

The law creates a six-member Federal Elections Commission, with civil enforcement powers. Many believe the success of the reforms will depend on how zealously the commission enforces them.

The initial impact of the law will fall on candidates for the 1976 Presidential nominations.

Gov. Jimmy Carter of Georgia and Representative Morris K. Udall of Arizona already have announced their candidacies. Other Democrats — notably Senator Henry M. Jackson of Washington and Lloyd K. Bentsen of Texas — have begun well-financed exploratory operations.

Whatever money they spent before midnight is not affected by the law. But any money spent from now on — even though donated before Jan. 1 — will be subject to the spending ceiling.

A similar rule will apply to Senate and House incumbents with campaign funds left over from previous years.

Any Democrat or Republican who decides to enter the primaries can become eligible for taxpayer financing.

To qualify for the financing, the candidate must raise $100,000 — with $5,000 each from 20 states in contributions of $250 or less. The Government will match that $100,000 plus every additional contribution of $250,000 or less up to a total of $5-million. Primary candidates cannot spend more than $10-million for the nomination.

The winners of the Democratic and Republican Presidential nominations can get $20-million for the general election from the Government or can choose to use only private contributions. In either case, a Presidential nominee can spend no more than $20-million.

Reports Required

In addition, the law provides $2-million for each major party convention.

Beginning today, individuals are limited to overall contributions of $25,000 in a single year and no more than $3,000 to an individual candidate — $1,000 each in the primaries, a runoff, and the general election. Organizations are limited to contributions of $5,000 in each of three possible races for one candidate.

The law limits spending by Senate and House candidates, bans cash contributions over $100 and requires reports on contributions and expenditures.

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WALL STREET JOURNAL 8/25/75 p.

T Unit Gets ing to Boost $280 Million

ide Urges New York phone Receive 57% Requested Rate Rise

STREET JOURNAL *Staff Reporter*

— New York Telephone Co. 1280 million in annual rate in- 37% of the amount it seeks, if a official's recommendations are

A. Gollomp, hearing examiner e-rate case, is recommending he $187 million in annual rate in earlier state agency staff re- ged. New York Telephone is 8 million in higher revenue to sed costs.

er is pending before the New Service Commission. New York unit of American Telephone & , and intervenors have 20 days ions to the hearing examiner's n there will be 15 more days plies to these exceptions. The commission has until Oct. 22 to al decision.

the PSC acknowledges our additional revenue," a New e spokesman said. "However, recommended by the examiner siderably short of the earnings e to what inflation has taken ided.

e Rates

e recommendations in the ex- page report is one that the uldn't double the charge for ls to 20 cents. New York Tele- such calls have an operating 18 cents each.

p agreed with the PSC staff 20% rate increases for intra- nce calls should be limited to ytime hours. But he agreed ork Telephone proposal to re- ber of "distance bands" to 13

bands" are the toll rates age distances. The company's ory runs on a straight-line les from the eastern tip of the northwest corner of New rmally, a phone company ob- t would be expected that the istance of a phone call the st. But the upward curve flat- the first 50 miles, so New e wants to reduce the number or mileage, "bands."

ulpment Offerings"

more important rate structure ng involves "terminal equip- ." These are the rates for ent—such as pink "Princess' ed design instead of tradition- es; extra extensions; office and so on.

Telephone says it wants to -tal equipment rates an aver-

Firms' Worker-Financed Political Funds Are Expected to Multiply Under New Law

By ARLEN J. LANGE
Staff Reporter of THE WALL STREET JOURNAL

WASHINGTON — Corporate political funds fueled by voluntary contributions from employes are expected to multiply under a federal law that took effect this year.

The Federal Election Commission, which supervises gift-giving to candidates for federal office, last week started reviewing an employe-contributions fund proposed by Sun Oil Co. U.S. Steel Corp. plans shortly to announce creation of a similar "good government" fund for transmitting employe gifts to candidates picked by the company.

The surfacing of Sun Oil's plan "is probably the breakthrough that many companies have been waiting for," says Buck Byers, a fund-raiser for the Republican National Committee, which expects the corporate fund-raising plans to be especially helpful to GOP candidates. "Quite certainly, a great many corporations will establish this type of fund very soon," he says.

Automatic Deductions

Both the U.S. Chamber of Commerce and the National Association of Manufacturers are encouraging companies to devise similar plans as a counterweight to the political gift-giving clout of the AFL-CIO's Committee on Political Education, or COPE. COPE transmits money to favored candidates, usually Democrats, from contributions by members.

Under Sun Oil's proposal, company employes will be invited to authorize automatic deductions from their twice-monthly paychecks. The money will go into Sun's Political Action Committee, or Sun PAC, for ultimate distribution to candidates for President or Congress selected by a 15-member control group.

Under federal law, the most any employe could put into the company's political fund is $25,000 a year. David Twomey, who runs Sun's "Responsible Citizenship Program," says that ceiling is far above what even the company's top executives expect to give.

If cleared by the Election Commission, the company's fund would be eligible to disburse up to $5,000 to any single candidate in a given election, whether primary or general. Thus Sun, as a company, would reap the candidate's appreciation without violating the law against political contributions of corporate money.

Sun also is seeking clearance of a second plan providing for an automatic paycheck deduction for deposit in a bank. Upon the employe's authorization, the bank would send a contribution to a particular candidate, up to the limit of $1,000 on gifts by individuals. An employe also could operate outside the company contribution system, of course, giving up to $1,000 to any candidate. The combination of all gifts couldn't top the individual's maximum limit of $25,000 a year.

Around for a Long Time

Arrangements for pooling of voluntary contributions to win maximum political influence have been around for a long time. A Chamber of Commerce tally of reports filed with federal election supervisors showed about 100 contribution-pooling plans were being run by corporations last year, along with 200 operated by associations and special-interest groups.

In 1971, however, Congress put a crimp in the spread of this practice by forbidding government contractors, whether corporations or unions, to operate contributory political funds. In 1974 Congress reversed itself and removed this ban, effective last Jan. 1.

Sun Oil could have started up its new plan simply by registering as the law requires, but it submitted the details to the Federal Election Commission for clearance to be on the safe side. U.S. Steel similarly plans to get advance permission from the panel for its forthcoming fund-raising pool, according to a company spokesman in Washington.

Skittish Givers

Corporate executives were skittish political givers last year after so many big companies got into trouble with illegal corporate gifts to the 1972 Nixon reelection campaign. Now, fund-raisers at the Republican National Committee think the rewritten law allowing employes to pool their contributions in the company's name is much clearer, and they expect this money to come rolling in for next year's presidential and congressional races.

The Republican National Committee's Mr. Byers has been rovi[illegible] the country urging corporate managers to set up employe-contribution plans. He made one such pitch to executives at a recent luncheon in Houston, and plans similar drum-beating in Pittsburgh, Dallas and Los Angeles.

The Democrats' [illegible]

Court Dismisses Suit Challenging Navy On Trident Sub Base

WASHINGTON (AP) — A federal district judge dismissed a suit seeking to stop the Navy from building a $500 million Trident submarine base in Washington State, saying the environmental costs "are minute when compared with the benefits to the national defense and security."

Judge George L. Hart Jr. said his decision "is a realization that some changes, even major changes in the environment, may be required for the survival of the republic."

The suit was brought against the government by a coalition of environmental groups called "Concerned About Trident," which claimed the Navy failed to make proper environmental impact studies before starting work on the project.

The base, intended as the main facility for missile-firing Trident submarines in the Pacific, is being constructed in a rural area along Hood Canal on Puget Sound. Much of the controversy over the base has pitted local business leaders, builders and land de-

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k Telephone says it wants to special-equipment rates an aver- al to $30 million a year in reve- C staff doesn't want the com- k and choose which special- rates should be increased by s than others. It says that all ment rates should be boosted and then another 25% six or later.

mp, the examiner, recommends crease of 20% across the board cial-service items with a rise of nths later.

hem Steel Tells s It May Close ation Facilities

STREET JOURNAL Staff Reporter

HEM, Pa. — Bethlehem Steel ficials of two of its unions that costs in its fabricated steel division aren't "competitive" shops, and said that unless ced the company would sched- of its four structural steel fabri- ies.

officials are set to meet Sept. Steelworkers union officials he matter, "the company said tement.

are continuing at Bethlehem's ocating shops in Bethlehem, Pottstown, Pa., and Tore- said. About 2,640 workers are the facilities. They are mem- teelworkers union and also the ican Federation of Technical

any in the past year announced ies for its Pinole Point, Calif., plants due to "lack of busi- ," a company spokesman. oint plant has been closed and ant is being phased out.

em spokesman refused com- y employment costs weren't currently, and wouldn't dis- s of the fabricating shops.

a Steelworkers union spokes- underlying issue could be the wages and benefits between by the basic steel contract, Steelworkers' contract with the producers, and shops at anies that aren't covered by tract. "Nobody could be higher steel rates," he said.

Bethlehem announced devel- oal mine near Johnstown, Pa., month. The mine is scheduled production in 1978, to produce nnually of metallurgical coal, in steelmaking, and to employ e estimated life of the facility thlehem said.

ola Co. Acquires see Syrup Firm

ranch Journal Staff Reporter

— Coca-Cola Co. said it ac- ola Bottling Co. (Thomas) Inc. million.

noogs, Tenn., company was aining "parent bottler" of the U.S. It didn't bottle the

the controversy over the base has pitted local business leaders and land de- velopers against people who live in the sur- rounding countryside.

In its environmental impact statement, the Navy said that as the area is developed to handle 27,000 new residents "some areas with a rustic visual quality will possibly be- come suburbanized and lose some of their natural scenic appeal."

The coalition claimed the Navy's studies were arbitrary and capricious.

But Judge Hart, in his decision, said: "In the light of the long-run development of the Trident system and the present state of nu- clear capabilities and operational necessi- ties, it cannot be said that the substantive decision to proceed with Trident was arbi- trary, capricious or an abuse of discretion."

He said national defense decisions put a peculiar aspect on environmental considera- tions. "This is a recognition that national defense is a unique area and . . . proper ju- dicial review can only examine the substan- tive decision under the arbitrary-capricious standard," the decision said.

Second Gulf Oil Holder Sues Directors, Officers Over Stock-Option Plan

By a WALL STREET JOURNAL Staff Reporter

NEW YORK — Another Gulf Oil Corp. shareholder filed a lawsuit charging that certain Gulf officers and directors cost the company $2.8 million through manipulation of its stock-option plan.

In a two-part suit filed in a federal court here, Abraham Wechsler, the shareholder, also asked that the company's directors be forced to repay $10 million in political con- tributions that Gulf earlier acknowledged making between 1960 and 1973.

In Pittsburgh, a Gulf spokesman said the company wasn't aware the suit had been filed and thus couldn't comment on it. The suit is similar to one filed by another Gulf shareholder earlier this month in Pitts- burgh.

The complaint of Mr. Wechsler, identi- fied only as a citizen of New York State, cited the rescinding by Gulf in November 1974 of earlier-granted stock options for 760,000 common shares at an average option exercise price of $21.75 and the granting of new options for 715,000 shares at an aver- age option price of $17.81. "The rescission of the earlier option plan and reissuance of options was in violation of the provisions of the stock-option plan approved by stock- holders of Gulf," the suit claims.

Philippine Government, Japanese Firm to Build $72 Million Dry Dock

MANILA (AP)—The Philippine govern- ment said it has signed with Kawasaki Heavy Industries of Japan a letter of intent to jointly establish a ship-repair yard cost- ing the equivalent of $72 million in Subic Bay, 65 miles northwest of here.

Under the letter of intent, Kawasaki will build a dry dock capable of handling 300,000 tons of shipping annually. It will service Pittsburgh, Dallas and Los Angeles.

The Democrats don't expect much butter on their bread from the corporate pools. "We aren't promoting it, though we expect to get a share of the contribution," says a spokesman for the Democratic National Committee. He agrees the Republicans will be the main beneficiaries.

Sun Oil's Mr. Twomey says the compa- ny-controlled political action fund "is a minor subsystem" in a much-broader pro- gram of encouraging employe political par- ticipation. As would be expected, he pledges there won't be any pressure on employes to put money into the fund. "If the employes don't like it, man, we're going to let it die," he says. "There's no way we can impose this on anyone," he adds.

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LA TIMES — 10/7/75
Part 1 pg 7

Justices Will Rule on Campaign Laws

BY LINDA MATHEWS
Times Staff Writer

WASHINGTON—The Supreme Court set the stage Monday for a showdown on the constitutionality of the sweeping campaign financing reforms enacted after the Watergate scandal.

Acting with extraordinary speed, the high court called for arguments this fall on the complex and controversial 1974 Federal Election Campaign Act and on the tax law setting up public funding for presidential campaigns.

The justices will hear four hours of arguments on the intertwined issues, probably next month. It is understood that the court hopes to hand down its decision by Christmas, before the 1976 presidential campaign gets into full swing.

The campaign financing law limits the size of political contributions, imposes spending ceilings on candidates, requires disclosure of all contributions above $100 and establishes a Federal Election Commission to enforce the regulations.

The major provisions of the statute were sustained in August by the U.S. Court of Appeals here, which declared that the law's "incidental impact" on First Amendment rights was justified by the need to rid American politics of "the corrosive influence of money."

An unusual coalition of liberals and conservatives, led by Sen. James L. Buckley (Cons-R-N.Y.), independent presidential candidate Eugene J. McCarthy and the New York Civil Liberties Union, appealed that decision to the high court.

Their primary argument is that the financing law, by restricting how much contributors can give and how much candidates can spend, impedes the exchange of political views in violation of First Amendment freedoms of speech, press and association.

Also under attack in the case (Buckley vs. Valeo, 75-436 and 75-437) is the public financing of presidential elections from $1 and $2 contributions designated by taxpayers on the "checkoff" section of their tax returns.

According to the challengers, the formula by which these public funds will be disbursed heavily favors major presidential contenders and established political parties at the expense of independents, new parties and splinter groups.

"Congress (has) accorded the two major parties an entrenched position as the only serious contenders in presidential politics," the challengers argued in their appeal.

Supreme Court review had been more or less preordained. At Buckley's behest, Congress amended the finance law to permit direct appeals to the justices for a definitive decision before the 1976 election season.

Although the law breezed by the appeals court, it may not fare so well in the Supreme Court. The court's three liberal members, holdovers from the era of Chief Justice Earl Warren, tend to be staunch defenders of First Amendment rights, as is Justice Potter Stewart.

And although President Nixon's four appointees often defer to Congress on policy issues and might be inclined to uphold the law, two of them, Justices Harry A. Blackmun and Lewis F. Powell Jr., recently have shown an increasing sympathy for free speech claims.

Even the appeals court conceded that some sections of the law were of dubious constitutionality. It held nonetheless that "these latest efforts on the part of our government to cleanse its democratic processes should at least be given a chance to prove themselves. Certainly they should not be rejected because they might have some incidental, not clearly defined, effect on First Amendment freedoms."

Under the law, individuals would be able to contribute no more than $1,000 to a candidate in any one campaign and no more than $25,000 to all political hopefuls in one calendar year.

The law's spending ceilings, which vary from $140,000 for candidates for House seats to $30 million for presidential nominees, have been subjected to especially harsh criticism. Critics charge that the ceilings favor incumbents and discriminate against political novices who might need to spend more to make themselves known.

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Washington Post

Court Upholds Election Law, Voids Portions

End Seen Near For Commission

By Stephen Isaacs
Washington Post Staff Writer

The most severely injured victim of the Supreme Court decision on the 1974 election laws yesterday is the Federal Election Commission.

The commission, established by Congress to enforce its campaign limits, is 8 months old today, and, from indications yesterday, probably will not live to see its ninth monthly anniversary.

The reason is that the key man in the House who could save the commission, Rep. Wayne L. Hays (D-Ohio), said yesterday that he intends to abolish it.

A major part of the court's decision was its declaration that the method of choosing commission members is unconstitutional.

Hays in 1974 insisted that Congress and not the White House retain control over the commission, and thus succeeded in changing the Senate bill by having four of the six commission members be congressional appointees. The original Senate bill specified that the President name all six.

The court struck down the arrangement on the basis that it violated the Constitution's separation of powers doctrine, that the Congress cannot both legislate and enforce.

It said that, unless Congress changes the way the members are chosen in the next 30 days, the commission will be limited to the functions of a congressional committee. In effect it would be reduced to the record-keeping and occasional auditing function that was performed, before the 1974 law, by the clerk of the House, secretary of the Senate and General Accounting Office.

In the Senate, staff aides planned to work through the weekend to write the legislation necessary to repair the damage, with Sens. Edward M. Kennedy (D-Mass.), Hugh Scott (R-Pa.) and Dick Clark (D-Iowa) taking the lead.

They said their intention is to submit a bill Monday.

Aides to these senators were working to reassemble the coalition of liberal senators that included those three, plus Sens. Walter F. Mondale (D-Minn.), Richard S. Schweiker (R-Pa.) and Alan Cranston (D-Calif.), to pull together another winning combination speedily.

One of the aides said yesterday that the weekend group will discuss whether to insert in the bill to be proposed Monday the public financing of all Senate and House races. Hays removed this provision in 1974. The senators also are to consider an attempt to close what some of them see as a loophole, created by the court's decision, permitting individuals to

See IMPACT, A4, Col. 1

Spending Limits Struck Down

By John P. MacKenzie
Washington Post Staff Writer

The Supreme Court upheld major sections of the 1974 federal election law yesterday, including the public financing of presidential races, ceilings on political contributions, and financial disclosure requirements.

At the same time the court struck down limits on what candidates can spend, and it held that the method for selecting Federal Election Commission members, who enforce the law, is unconstitutional.

The court ruled that although Congress cannot compel presidential candidates to observe spending ceilings as a flat rule, it can make them observe the limits if they accept federal matching grants. As a result, most if not all of the 1976 presidential aspirants are expected to adhere to the ceilings, almost $13 million for the primaries and nearly $22 million for the general election.

Both sides claimed victory in the mixed results. John Gardner, chairman of the citizen lobby Common Cause, called it a win "for all those who have worked so hard to clean up politics in this country. The fat cats won't be able to buy elections or politicians any more."

Sen. James L. Buckley (Cons.R-N.Y.), who led a challenge on behalf of political independents and others who charged their consitutional rights were violated, said the court "struck a major blow for the forces of freedom" by permitting unlimited political spending. He added that the court had left standing "a clearly unworkable set of ground rules" that Congress must revise.

The decision created an immediate problem for Congress over whether to revive the commission, which the court said could not exercise its far-reaching powers to enforce the law so long as any of its six voting commissioners are appointed by Congress rather than the President. Now four are appointed by Congress.

The justices, who were unanimous in ruling that the makeup of the commission was unconstitutional, said their ruling would be stayed for 30 days to give Congress time to "reconstitute the commission by law or to adopt other valid enforcement mechanisms."

In the meantime the court said about $5 million given out last month by the commission in matching grants to 12 presidential candidates was valid.

The decision was spelled out in an unsigned 137-page opinion for the court and five separate opinions by justices concurring and dissenting on various issues in the complex case.

See COURT, A4, Col. 4

United Press International

e agency's Langley headquarters.

CIA's Colby Makes Way For Bush

By Laurence Stern
Washington Post Staff Writer

William E. Colby walked the last few steps to his dusty Buick Skylark for his final drive home from CIA headquarters, leaving behind his successor, George Bush, and the President of the United States.

There was a rising gust of applause as the crowd of colleagues, some of them wet-eyed, realized that Colby had detached himself from the transitional spectacle for his solitary departure yesterday — a victim of changing public attitudes and the revelations that he himself had set in motion.

The car, with Colby at the wheel, moved slowly away from the guards and the applause as President Ford and Bush shook hands and pressed flesh as though the big white building surrounded by miles of chain link fence were a suburban supermarket at campaign time...

It was an ending that would

Ford N.H. Campaign Shifts

By David S. Broder
Washington Post Staff Writer

CONCORD, N.H., Jan. 30 — President Ford's campaign

Florida, also, the Ford committee is now putting an emphasis on phone banks in an effort to match the Reagan

Spencer gave no figures but said the survey showed "it's a horse race, but our support is firmer than it was."

Washington Post A4 col 3
January 31, 1976

Election Act Upheld; Portions Voided

COURT, From A1

Chief Justice Warren E. Burger, who announced the judgment in a special court session yesterday, disagreed with most of it and filed a dissent that would have struck down virtually the entire law.

The vote was 6 to 2 to sustain the contribution limits as Justice Harry A. Blackmun joined Burger in dissent. The vote to strike down the expenditure ceilings was 7 to 1, with Justice Byron R. White dissenting. Justice Thurgood Marshall added a partial dissent, saying the court should have upheld restrictions on personal campaign spending by wealthy candidates.

Extensive financial disclosure and the law's plan for subsidizing presidential races were upheld, 7 to 1, over Burger's lone dissent. The vote against the commission's composition was 8 to 0. Justice John Paul Stevens, who joined the court after arguments were heard, did not take part.

The court had been under pressure to issue its ruling in advance of the current campaign season. The lawsuit was speeded through a lower court and taken to the high court on direct appeal under a provision of the 1974 law that Buckley had sponsored in hopes that the courts would quickly kill the law.

Buckley, independent candidate Eugene J. McCarthy (a former Democratic senator from Minnesota), and a host of political and civil liberties organizations contended that the law was a gross violation of their First Amendment rights of free speech and political expression.

Supporters of the law admitted that the money restrictions involved some limitation on political speech but argued that they were justified by the need to curb big-money abuses highlighted by Watergate scandals.

The court majority agreed with Buckley's argument for spending ceilings but rejected it for the contribution limits.

The difference, said the court, is that limits on contributions — $1,000 per individual for each candidate, $5,000 for political organizations and committees and a $25,000 limit for all political giving by an individual in any one year — are less direct and less serious restrictions than the limits on expenditures.

A contribution limit "entails only a marginal restriction upon the contributor's ability to engage in free communication," the court said, and it "does not in any way infringe on the contributor's freedom to discuss candidates and issues."

By contrast, the court said, restricting what a candidate can spend "necessarily reduces the quantity of expression by restricting the number of issues discussed, the depth of their exploration and the size of the audience reached. This is because virtually every means of communicating ideas in today's mass society requires the expenditures of money."

In a footnote, the majority opinion said, "Being free to engage in unlimited political expression subject to a ceiling on expenditures is like being free to drive an automobile as far and as often as one desires on a single tank of gasoline."

The same defect was found in the law's limitation of $1,000 per individual on so-called "independent expenditures" that have the effect of supporting a clearly identified candidate.

This provision, defended as a "loophole-closing" device that would thwart efforts to circumvent the contribution limits, would have made it a crime for an individual to place a quarter-page political advertisement in a metropolitan newspaper, the court noted, because such an ad would cost more than $1,000.

The court majority said the provision was ineffectual, given the "ingenuity and resourcefulness" of persons determined to skirt the restriction, and it imposed too great a burden on First Amendment rights.

The court said the independent political activity restricted by the provision "does not presently appear to pose dangers of real or apparent corruption comparable to those identified with large campaign contributions."

Opponents of the law said yesterday that by striking down this provision, the court was allowing candidates' supporters to pay for duplicating advertisements, to reproduce and distribute campaign material and to lend other aid without violating the law because such activity would not require them to consult with the candidates. Consultation, they conceded, would involve the supporters in restrictions applicable to the candidates.

Disclosure provisions, which require political committees to identify everyone contributing as little as $100 to a campaign, were sustained against the charge that they would harass minor parties and bury them in red tape.

The court left open the possibility that minor parties may yet escape the requirement by showing that they are in danger of specific harassment that would deter their supporters from contributing. Otherwise, the court said, the disclosure provision serves the valid purpose of informing the public about political financing, deterring corruption and making it easier to detect violations of the law.

Public financing of presidential campaigns was upheld against claims that it favored the established parties against new political forces and favored incumbents at the expense of challengers.

Funds for the campaign subsidies come from money designated by individual taxpayers who may authorize the deduction of $1 from their tax bills for that purpose.

The distribution formula allows major-party candidates to receive their money during the campaign, but candidates of new parties receive subsidies only after the campaign is over — and then only if they have received more than 5 per cent of the popular vote. Any new party receiving more than 5 per cent of the vote in a presidential election would automatically be entitled in the next election to federal matching funds based on the percentage of vote received.

The distribution formula, the court said, "is a congressional effort, not to abridge, restrict or censor speech, but rather to use public money to facilitate and enlarge public discussion and participation in the electoral process — goals vital to a self-governing people."

As for the alleged discrimination, the court said Congress was entitled to take into account, as a political "fact of American life," that for a century "no third party has posed a credible threat to the two major parties in presidential elections" with the exception of the 1912 Bull Moose campaign that split the Republican Party.

Justice William H. Rehnquist, joining Burger in a partial dissent on this point, said the law has "enshrined the Republican and Democratic parties in a permanently preferred position."

Federal Election Commission Asked to Rule on Morton Pay

By Edward Walsh
Washington Post Staff Writer

The Ford administration, acting the same day the Supreme Court ruled that the Federal Election Commission is improperly constituted, asked the FEC yesterday to decide whether portions of the salaries of aides to public officials should be considered campaign expenditures.

In a formal request for an advisory opinion from the FEC, White House Counsel Philip W. Buchen pledged that President Ford will abide by such an opinion in the case of Commerce Secretary Rogers C.B. Morton, who will join the White House staff next week as a $44,600-a-year adviser to the President on economic and political issues.

Buchen said the President Ford Committee will reimburse the federal treasury for any portion of Morton's salary that the FEC finds should be considered a political expenditure.

While Buchen asked for a speedy ruling, a spokesman for the FEC said it is "highly unlikely" the FEC will act on any such issues for at least 30 days because of the Supreme Court ruling.

In a lengthy ruling yesterday, the court upheld limits on political contributions but struck down the campaign spending ceilings set in the new federal election law. The court also held that the FEC itself is unconstitutionally made up because, while it performs an executive function, a majority of its members are congressional appointees.

The court delayed formal implementation of its ruling on the FEC makeup for 30 days to give Congress a chance to correct it.

Buchen's letter was prompted by the controversy over Morton's appointment to the White House staff and the question of how much of his time he would spend on political activities in connection with Mr. Ford's campaign for the Republican presidential nomination. Earlier, the Democratic National Committee filed a complaint with the FEC on the Morton appointment.

In his letter to FEC Chairman Thomas B. Curtis, Buchen broadened the potential impact of future commission rulings on the subject by asking for an opinion not just on Morton's case but also one covering "any portion of the salaries of assistants to public officials" in general.

Last week, Buchen met with Curtis and suggested a possible compromise in the Morton case — that Morton work 40 hours a week on official White House matters and spend any additional time as a "volunteer" on political activities. Curtis happily accepted the idea.

The bulk of Buchen's letter dealt with what he said would be Morton's official White House duties, including advising the President on domestic issues and serving on the Economic Policy Board, the Energy Resources Council and the Domestic Council.

"Apart from the aforementioned official duties," Buchen wrote, "Secretary Morton plans to spend time of his own participating in campaign activities on behalf of the President. In particular, Secretary Morton will participate in PFC (President Ford Committee) political strategy sessions, deliver political speeches, attend PFC fund-raisers and engage in other campaign activities."

Buchen did not specify how much time each week Morton would spend on "official White House duties" and how much on "campaign activities."

Court Denies New Trial in Killing

(Tony) Boyle was found guilty

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NEW CHIEF AT CIA—George Bush, left, just sworn in as director of the Central Intelligence Agency, talks with his predecessor, William E. Colby, and President Ford, who went to CIA headquarters in Langley, Va., for the ceremony. Colby, who had continued to serve as CIA chief three months after Ford fired him, was cheered by CIA employes as he drove off in family car for the last time.

STORY IN PART 1, PAGE 3

AP Wirephoto

Justices Void Key Election Money Curbs

Most Reforms Upheld but Vote Commission Is Stripped of Powers

BY LINDA MATHEWS
Times Staff Writer

WASHINGTON—The Supreme Court Friday upheld almost all of the sweeping campaign finance reforms enacted in the wake of the Watergate scandal but ruled that Congress had trampled on First Amendment freedoms by imposing limits on campaign spending.

Sustained by the high court were the major provisions of the 1974 Federal Election Campaign Act Amendments, including the public financing of presidential campaigns, wide-ranging public disclosure requirements and limits on individual contributions to candidates for federal office.

But the justices adopted what they referred to as the old folk adage that "money talks" and struck down the expenditure ceilings of the act as "direct and substantial restraints" on freedom of expression.

Although the court explicitly removed the spending ceilings, the impact of that ruling will be felt primarily by candidates for the House and Senate, rather than by presidential contenders.

The justices held, with very little explanation, that any presidential candidate who had received federal subsidies for his campaign still must observe the act's spending limits of $10 million for the primaries and $20 million for the general election.

This strange turn of events came about because all the major presidential contenders, 10 Democrats and two Republicans, had signed a pledge to abide by the spending limits when they were granted matching funds. Now the candidates are bound by that pledge, the high court held.

Both supporters and opponents of the federal election law hailed the decision as a victory, apparently because the 137-page majority opinion was so confusing, in places even inconsistent, that it seemed to provide a little something for everyone.

Sen. James L. Buckley (R-Cons-N.Y.), leader of the unusual coalition of liberals, conservatives and civil liberties groups that had pressed the court test of the law, said that the decision "struck a major blow for the forces of freedom" by invalidating compulsory spending limits.

Former Sen. Eugene J. McCarthy (D-Minn.), another opponent of the law who is now mounting an independent drive for the Presidency, also expressed "great satisfaction," though he said the court should have gone further.

On the other side of the litigation, John W. Gardner of Common Cause, the self-styled citizens' lobby, was equally pleased by the outcome, particularly by the court's upholding of the requirement that all donations of $100 or more be disclosed publicly. "We're never going back to the old corrupt way of campaign financing that was destroying our American political system," Gardner said.

If there was a big loser Friday, it was the Federal Elections Commission, the agency set up to enforce the financing reforms.

The justices, in the only unanimous section of the decision, stripped the commission of most of its powers, in-

Please Turn to Page 7, Col. 1

Doctors Assail Brown Malpractice Proposal

Call It 'Inadequate'; McCarthy Would Drop Support if Tax Funds Are Used

BY LARRY STAMMER
Times Staff Writer

SACRAMENTO—Gov. Brown's long-awaited medical malpractice reform bill, heralded by him as a compromise, was formally unveiled Friday and was immediately assailed by striking doctors as "wholly inadequate."

At the same time, Assembly Speaker Leo T. McCarthy (D-San Francisco), who only last Wednesday agreed to support the bill, privately informed the Administration in the strongest terms he would not hesitate to withdraw his support if there were even a hint that taxpayers would be asked to subsidize the plan.

The negative reactions from McCarthy and physicians indicated the governor's program as it stands faces a doubtful future.

But Assembly Minority Leader Paul Priolo (R-Pacific Palisades) said Republicans are behind the plan's concept and urged doctors to return to work.

"Hopefully, this plan will demonstrate to physicians who are walking out, who have walked out, or are thinking about it that a real effort is being made by the Legislature," Priolo said.

Even as details of the proposal were disclosed during a joint press conference called by the governor and the bill's author, Assemblyman Howard Berman (D-Los Angeles), plans were underway for a meeting next week between Berman and doctors to discuss possible amendments.

Meanwhile, two meetings by physicians were scheduled this weekend in Los Angeles to assess the program and gauge the reaction from doctors.

But the initial response from spokesmen for United Physicians of California and the California Medical Assn. Friday ranged from cautious to openly hostile.

Dr. Carl Goetsch, president of the 26,000-member California Medical Assn., declared, "The Administration must realize that this proposal is wholly inadequate. We question whether the Administration yet fully understands the problem.

"Its proposal is unlikely to solve the malpractice insurance dilemma that is disrupting medical care in Southern California," Goetsch said.

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WHICH IS BEST?

Four Options —a Dilemma for Doctors

BY ALEXANDER AUERBACH
Times Staff Writer

The debate over malpractice insurance may go on for years, but sometime soon the doctors of California will have to sit down with their checkbooks and figure out what form of coverage is best for them.

The alternatives, include the state insurance fund proposed by Gov. Brown, any of the several doctor-owned reciprocal or mutual insurance companies now operating in the state, Travelers Insurance Co., or "going bare"—practicing with no liability insurance at all.

Each of the alternatives carries a price tag. And each has significantly different short and long-range implications not only in terms of cash but in the way the physician will be practicing medicine in the future. So each doctor's decision probably will be based on much more than the dollars to be paid out this year.

A state fund is the most difficult to evaluate because it still subject to legislation. Important details that will affect its ultimate cost have not been ironed out—indeed, its planners admitted Friday that there were significant issues that they hadn't even considered until questioned by the press.

Participation in a state fund also involves philosophical issues, since doctors covered by it would be answerable to review committees that

Please Turn to Page 18, Col. 1

Justice Department Seeks Investigations of IRS Chief

Will Ask Grand Juries to Inquire Into Suspension of Probe of Caribbean Tax Haven, Other Charges

BY ROBERT L. JACKSON and GAYLORD SHAW
Times Staff Writers

WASHINGTON—The Justice Department has decided to ask two federal grand juries to investigate allegations involving Internal Revenue Service Commissioner Donald C. Alexander, The Times learned Friday.

The department's decision to bring witnesses before the grand juries—one based in Washington and another in Miami—marks an escalation of a three-month-old FBI inquiry into Alexander's conduct as the nation's chief tax collector.

The FBI has been examining the sworn congressional testimony of Alexander and other IRS officials about the agency's suspension last August of a Caribbean tax haven investigation.

FBI agents have also been checking out an informant's report that a convicted swindler arranged to meet with Alexander aboard a yacht to discuss the ex-convict's income tax debt. Apparently, there never was such a meeting but agents have sought to learn if one was canceled at the last moment.

Several sources said the purpose of these grand juries would be to unravel conflicting statements.

The investigation is not at the stage where evidence is being presented for the purpose of returning indictments, one source said.

Robert J. Havel, a Justice Department spokesman, refused to comment on the Alexander investigation, as did Leon Levine, an IRS spokesman.

Alexander has repeatedly denied any wrongdoing. He has charged that he is the target of "faceless liars" and "a small goon squad of congressional investigators."

Aside from the Justice Department investigation, Alexander's stewardship of the IRS is being examined by two House subcommittees. These inquiries are partly the result of a long-running controversy over the IRS intelligence division's operations, which Alexander has curtailed on

Please Turn to Page 4, Col. 1

Art Fraud Losses Put in Millions

Beverly Hills Dealer Enters Plea of Guilty

BY WILLIAM FARR
Times Staff Writer

A Beverly Hills art dealer accused by Dist. Atty. John Van de Kamp of generating $5 million in fraudulent sales of masterpieces by Picasso, Matisse, Van Gogh and others pleaded guilty Friday to grand theft charges.

The victims included prominent Los Angeles area businessmen, attorneys, and even a bank.

Frank Heller surrendered to district attorney's investigator Jack Exworthy after being informed that the Los Angeles County Grand Jury was looking into his art dealings.

Kissinger Warns Third World on Opposing U.S.

From Times Wire Services

WASHINGTON—Secretary of State Henry A. Kissinger warned Third World nations Friday that they must cooperate with the United States in the United Nations and other international forums if they want preferential trade treatment.

"The hostility of some Third World spokesmen and bloc voting have made constructive discussion in U.N. forums between the industrial and developing worlds almost impossible," Kissinger said.

He also said that the Ford Administration will not seek to remove restrictions on trade with the Soviet Union or try for new major economic deals with Moscow because of Russian interference in Angola.

Testifying before the Senate Finance Committee, Kissinger asked about the $300 million limit put on credits to Russia and other impediments to trade with Moscow.

He answered that he still opposes such restrictions in principle, but "in view of the situation in Angola" he plans no efforts to rescind the limits, at least "not in the immediate future."

At another point, Sen. Paul J. Fannin, (R-Ariz.) asked if Kissinger would support any new large-scale trade arrangements with the Russians.

Again pointing to the massive Soviet intervention in Angola, the secretary answered, "This is not the time to come forward with large-scale economic projects" with Moscow.

Discussing Third World ties, Kissinger said he had asked U.S. embassies to make clear that the United

Please Turn to Page 9, Col. 3

...ON INDUSTRY

...oves to Open

...s to Woman

PRESIDENTIAL RACE SEEMS UNAFFECTED

RULING ON ELECTION REFORMS

Continued from First Page

cluding authority to issue regulations, release advisory opinions, disqualify candidates found in violation of the law and institute court proceedings against continued disobedience.

The separation-of-powers principle of the Constitution prohibits the commission from exercising these administrative functions, the court said, as long as a majority of its members were appointed by Congress rather than by the President.

As required by Congress, which sought to ensure that no political party would dominate it, the commission currently includes two members appointed by the President, two named by the Speaker of the House and two by the President Pro tem of the Senate. The secretary of the Senate and the clerk of the House also sit on the commission as ex-officio members, although they cannot vote.

The high court, although conceding Congress' wide-ranging powers to regulate federal elections, ruled that the commission's composition violated the "appointments clause" of the Constitution. That provision grants the President authority to nominate all government officials responsible for enforcing federal laws.

Rather than order the commission out of business immediately and leave no one to enforce the law, the court said that its ruling would not take effect for 30 days, thus giving Congress time to restructure the commission.

President Ford promptly called on congressional leaders to meet with him to discuss emergency legislation to save the elections commission. But there were doubts Friday about whether that would be possible, in the face of formidable opposition from Rep. Wayne L. Hays (D-Ohio), a long-time foe of the commission. Hays vowed to introduce a bill to abolish it.

In the unsigned majority opinion, the heftiest issued by the court in recent years, the justices carefully picked their way through the complex finance law, striking down some sections, upholding others.

Only three justices—William J. Brennan Jr., Lewis F. Powell Jr. and Potter Stewart—fully subscribed to the court's opinion, a sign that they probably were its primary authors.

Five other justices filed separate opinions, concurring in some sections of the majority opinion and dissenting from others.

The newest member of the court, Justice John Paul Stevens, took office a month after the case (Buckley vs. Valeo, 75-436) had been argued and did not vote on it.

The chief casualty of the ruling, the limits on campaign spending, fell on a 7-1 vote, with Justice Byron R. White dissenting. The majority adopted the argument of the law's opponents, that such ceilings impeded the exchange of political views, the very kind of expression that the First Amendment was intended to protect.

"A restriction on the amount of money a person or group can spend on political communication during a campaign necessarily reduces the quantity of expression," the high court held. "This is because virtually every means of communicating ideas in today's mass society requires the expenditure of money."

The court knocked down not only the overall ceilings on campaign expenditures, which let a candidate for the House spend $168,000 and a presidential nominee $20 million, but also the limits on a candidate's use of his personal fortune.

Rejected were the contentions that these limits were justified by the need to stop the race in campaign spending, to reduce the candidates' dependence on so-called "fat cat" contributors and to offset the inherent advantages enjoyed by affluent candidates for public office.

The skyrocketing costs of electioneering do not justify such intrusions, the court majority held, because "the First Amendment denies government the power to determine that spending to promote one's political views is wasteful, excessive or unwise . . . It is not the government but the people . . . who must retain control over the quantity and range of debate . . ."

The corrupting influence of big money best could be curbed by the contribution limits of the law, the court said, rather than by shutting off spending. And it makes little sense to stop wealthy politicians from dipping into their own fortunes to finance their campaigns, the court added, because—if anything—these self sufficient candidates are in a better position to ward off evil outside influences.

Another casualty of the ruling was what had come to be known as the "loophole-closing" section of the law, which made it a federal crime for individual citizens to spend more than $1,000 in support of a "clearly identified candidate."

This provision was inserted in the law so that a contributor, after donating to a campaign the $1,000 maximum decreed by the law, could not circumvent the limit by, for example, buying expensive television and radio time on his own to back the same candidate.

But the high court said that this limit on individual expenditures went too far, making it impossible even for a private citizen to buy a quarter-page ad in a major American newspaper to express his political preferences.

As long as such expenditures are truly independent of the candidate and are not controlled or coordinated with his campaign, an individual citizen is free to spend as much as he chooses to voice his own opinions, the court held.

In dissent, White complained that the expenditure limits were needed to "reinforce the contribution limits" upheld by the court and to halt the notion that candidates "purchase their election." He particularly criticized elimination of the loophole-closer.

Justice Thurgood Marshall filed a short dissenting opinion protesting only the majority's decision to allow rich candidates unlimited access to their own fortunes, rather than the maximum of $50,000 established by the law. Marshall said that the majority had afforded rich men a "significant head start" that their poorer competitors would "never overcome."

The court split, 6 to 2, in upholding the law's contribution limits, which permit an individual to contribute no more than $1,000 to a candidate in any one campaign and no more than $25,000 in one calendar year.

Chief Justice Warren E. Burger and Justice Harry A. Blackmun, in separate dissents, said that the contribution limits infringed on political expression as much as the expenditure ceilings and should have been similarly invalidated.

Indeed, Burger would have struck down the entire law, he said, because the court had "cast off (so many) vital parts" that it had left "no more than a shadow of what Congress contemplated." He added: "I question whether the residue leaves a workable program."

The chief justice dissented again as the court voted, 6 to 2, to uphold public financing of campaigns, including matching funds for all serious presidential contenders, a $2 million subsidy to the national parties for their conventions and a $20 million lump sum for each of the major party nominees.

Justice William H. Rehnquist wrote a limited dissenting opinion on public financing, decrying that part of the law for discriminating against minor parties and splinter groups by denying them subsidies on equal footing with major parties.

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Facts on File World News Digest
February 7, 1976

SECTION: U.S. AFFAIRS
PAGE: Pg. 86 C1
LENGTH: 1648 words
HEADLINE: Election Law Upheld on Public Financing and Disclosure; Spending Limits and FEC Voided;
Supreme Court rules on election law
BODY:

The Supreme Court Jan. 30 in a landmark ruling upheld various portions of the 1974 Federal Election Campaign Act and struck down others. The decision (different parts of which were supported by different numbers of justices) upheld government financing of presidential campaigns and campaign contribution disclosure requirements, but struck down limits on political expenditures (except for presidential candidates who accepted federal subsidies). The decision also upheld ceilings on political contributions, and ruled that the Federal Election Commission (the agency created to enforce and administer the law) was unconstitutional as presently set up. [See 1975, pp. 95683, 78282; 1974, p. 85063]

Political commentators generally thought that it would take some time and several elections before all of the effects of the ruling upon the political scene could be tallied.

The 1974 law was challenged by a number of groups, as well as by the former Democratic senator from Minnesota, Eugene McCarthy, and by the Conservative Party senator from New York, James L. Buckley. They argued that the law violated the First Amendment guarantee of freedom of speech, and discriminated against minority parties and non-incumbents.

The challengers greeted the voiding of limits on political expenditures as an essential triumph. Brice Clagget, the main lawyer for the challengers, was reported in the Feb. 1 New York Times to have said in reference to a part of that ruling, "If that had gone the other way, the First Amendment would have been dead." In ruling as it did, the Supreme Court held that political spending was "speech," and so protected from limitation by the constitution.

But supporters of the election law also found reason to approve of the ruling, in its upholding of major portions of the 1974 law.

The rulings on specific parts of the law were as follows:

Public financing of presidential election campaigns -- The 1974 law was upheld on the financing provisions. Briefly, those provisions were: the major parties would receive $2 million each for their national conventions, and the candidates selected by those conventions would receive $20 million each (provided sufficient funds were generated by individuals checking off the $1 campaign subsidy item in their income tax returns). Candidates in presidential primaries could receive matching federal funds for each dollar raised (up to a $10 million public-private total, plus $2 million for fund raising) if they demonstrated broad national support by raising at least $100,000, with at least $5,000 coming from each of 20 states, and no individual contribution counting for more than $250. Finally, minor and new party candidates would receive funding in proportion to their votes, provided they obtained at least 5% of the total.

The court observed that these provisions were challenged "because [according to the claims of the appellants] they work invidious discrimination against minor and new parties in violation of the Fifth Amendment." The court disagreed. It held that the major parties had historically demonstrated their difference from other parties, and went on to say that, "Sometimes the grossest

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discrimination can lie in treating things that are different as though they were exactly alike . . . Since the Presidential elections of 1856 and 1860, when the Whigs were replaced as a major party by the Republicans, no third party has posed a credible threat to the two major parties in Presidential elections." The court further stated that the "appellants have made no showing that the election funding plan disadvantages nonmajor parties by operating to reduce their strength below that attained without any public financing."

Chief Justice Burger dissented from this part of the ruling on the grounds that public financing of presidential campaigns was "an impermissible intrusion by the government into the traditionally private political process."

Justice William H. Rehnquist dissented on the grounds advanced by the challengers. He argued that, while Congress could demand new or minor parties to show some evidence of support before granting them public funds, "Congress in this legislation has done a good deal more than that. It has enshrined the Republican and Democratic Parties in a permanently preferred position, and has established requirements for funding minor party and independent candidates to which the two major parties are not subject." He added: "I find it impossible to subscribe to the court's reasoning that because no third party had posed a credible threat to the two major parties in presidential elections since 1860, Congress may by law attempt to assure that this pattern will endure forever."

Expenditures and contributions -- The court generally accepted the contention of the challengers of the law that, in modern society, effective political speech required money, and limitations on the use of money were limitations of speech. However, it distinguished between political expenditures and contributions. Limitations on expenditures, it held, directly violated the First Amendment. **The court thus struck down several provisions of the campaign law: the ceilings on expenditures by congressional candidates in their campaigns; the $1,000 a year limit on expenditures by an individual in independent efforts for or against a specific candidate (and the $ 25,000 limit on all such expenditures by an individual in a year), and the ceilings on campaign spending (from either their own, or contributed funds) by presidential candidates who did not accept federal subsidies.** The court ruled, however, that candidates who accepted federal subsidies were subject to the limitations on spending specified in the act. (All of the major candidates for the presidency in 1976 have accepted the subsidies, so they remained bound by the ceilings.)

Justices Marshall and White dissented in favor of sustaining the limit on expenditures by a presidential candidate from his own or family funds. Justice White also dissented in favor of sustaining the other spending limits.

On the point of political contributions, however, the court sustained the ceilings provided for in the election law. It said: "It is unnecessary to look beyond the act's primary purpose -- to limit the actuality and appearance of corruption resulting from large individual financial contributions -- in order to find a constitutionally sufficient justification for the $1,000 contribution tribution limitation." It held that the "limited effect upon First Amendment freedoms" was outweighed by the purposes served by the act.

Chief Justice Burger dissented from the ruling sustaining contribution limits, saying that the "limitations infringe on First Amendment liberties and suffer from the same infirmities that the court correctly sees in the expenditure ceilings." Justice Blackmun also dissented.

Disclosure requirement -- The court upheld the law's requirements that the names and addresses of contributors of more than $10, and the names, addresses and business occupations of contributors of more than $100 be reported. The decision observed that three interests were served by disclosure: the public gained more information about the candidate, the requirement deterred both the actuality and the appearance of corruption, and the reporting and record-keeping

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would aid the government in enforcing the limit on contributions. Against these interests, the court acknowledged, had to be weighed the danger that public disclosure of contributions might inhibit some people from contributing, and "in some instances, disclosure may even expose contributors to harassment or retaliation." Challengers of the law argued that these dangers, especially in regard to contributors to minority or new parties, were such that the disclosure requirement should be voided. The court disagreed, but it did allow that "only a reasonable probability" of harassment or injury contingent upon disclosure need by proved by minor parties to gain exemption from the requirement.

Chief Justice Burger dissented, saying that the "act's disclosure scheme is impermissibly broad and violative of the First Amendment as it relates to reporting $10 and $100 contributions."

The Federal Election Commission -- The court unanimously held that the Federal Election Commission (FEC) as presently set up was unconstitutional. The FEC, it reasoned, in enforcing the election law performed executive duties. Therefore, according to the doctrine of the separation of powers, its officers should be appointed by the executive branch. The 1974 law gave Congress the power to appoint the majority of the officers.

(The court did not object to the composition of the FEC in respect to those of its duties which might be considered as delegated from Congress -- investigating and making public campaign practices.)

The court gave Congress 30 days to refashion the FEC, or enact some substitute means of enforcing the election law, before its ruling would take effect. It also validated all of the actions of the FEC to date. Chief Justice Burger dissented from the 30-day extension and validation of past actions.

Congressional observers foresaw a major battle facing legislators attempting to rework the FEC to comply with the Supreme Court decision. There was considerable doubt whether Congress could enact legislation dealing with the problem within the 30 day time limit.

The 137-page decision was not signed, but rather delivered per curiam, "by the court." Justices Brennan, Stewart and Powell concurred with the decision in its entirety. Justices White, Marshall, Blackmun, and Rehnquist and Chief Justice Burger dissented in part. Justice Stevens did not participate in the ruling, having been sworn in after oral arguments were heard.

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TITLE: WHAT THE NEW ELECTION LAW SAYS YOU CAN DO
REFR: Nation's Business Vol 64 No 8 pp 52-53, JOURNAL-CODE NAB
DATE: August 1976
ABST: FEDERAL LAW NOW SAYS A CORPORATE POLITICAL ACTION COMMITTEE ' PAC ' CAN SEEK CONTRIBUTIONS FROM RANK-AND-FILE WORKERS THROUGH ONLY TWO ANNUAL MAILINGS TO THEIR HOMES. NON-CONTRIBUTORS AND THOSE GIVING LESS THAN $50 REMAIN ANONYMOUS. GENERAL SOLICITING CAN ONLY BE GIVEN TO BOARDS, SHAREHOLDERS, EXECUTIVES - THOSE MAKING MANAGERIAL OR SUPERVISORY DECISIONS. UNIONS CAN ONLY SOLICIT MEMBER CONTRIBUTIONS AND SHAREHOLDERS OR NON-UNION MEN IN TWICE A YEAR WRITTEN REQUESTS. THOSE SOLICITED MUST BE TOLD THE PAC'S GOALS. CORPORATIONS MUST PROVIDE MAILING LISTS TO UNIONS OR INDEPENDENT MAILING SERVICES. INDIVIDUAL LIMITS ARE NOW $5,000 YEARLY, OR $ 25,000 OVERALL. PAC LIMITS ARE $15,000 YEARLY TO NATIONAL PARTIES OR $5,000 PER CANDIDATE. LIMITATIONS ALSO AFFECT NON-PARTISAN COMMITTEES, NON-STOCK FIRMS, AND OTHER ACTIVITIES.

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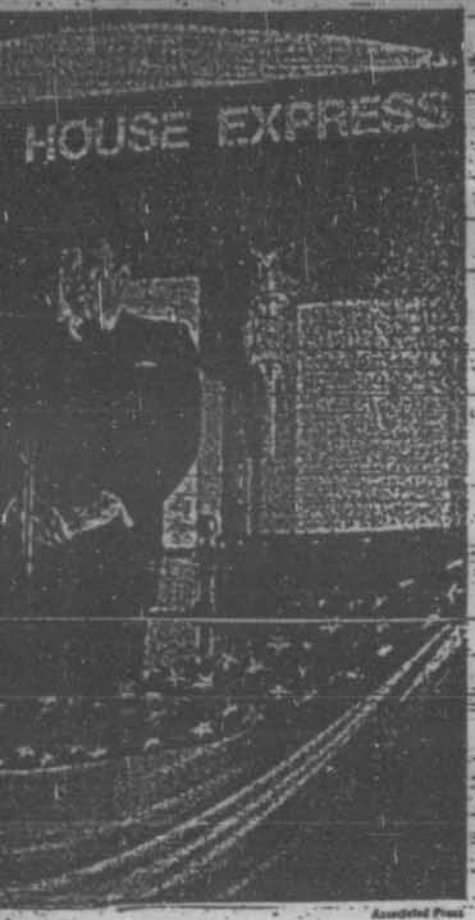

Associated Press

ters at San Diego home of Harry Summers Thursday
nearby in Mr. Summers's yard served as the stage.

Concessions if He Is Loser

In Washington so vigor- and by contending that Federal Government was use of much of the coun- ills, he has given observ- think he would be reluc- o choose a Vice Presiden- candidate from among ers of Congress.

former conservative Re- an governors upon which w also seem to circum- his options.

today, he said he would ile out a running mate served in Congress. He aid he might look to the e sector for a choice or mer governor."

ed if Senator Baker or or Brock — names that been circulating as possib- ning mates — were accep- to him. Mr. Reagan re- ed: "Neither one has ever philosophical position eat — from — ming. I've ht of them as philosophic- imilar to me."

er, at a news conference, id a lack of information th the public by the Ford inistration about foreign r moves this week "seems a developing pattern of y."

referred to the signing of ear treaty with the Soviet C and to reports that the nment is considering sell- ms to China.

Sees Soviet Threat

said that like most Ameri- he might welcome both t, but that the paucity of nation about each was un- e. The prospective China

"But we won't do that until after the election," he said. "We've postponed the negotiations on the Panama Canal until after the election, and that too was denied until they couldn't deny it any longer."

The American public was "also kept in the dark" on alleged Soviet violations of the strategic arms limitation agreements, he added. He saw similar secrecy surrounding American security interests in Angola.

"Here is another agreement [with the Russians] that is being signed and once again it is a fait accompli," Mr. Reagan said. "Never any text made available so that the American people know as to what is in this agreement. How can I comment or anyone else as to whether it is to our advantage when we have not been given the details?"

U.S. Rules Out Prosecution in Kentucky Political Inquiry

LOUISVILLE, Ky., May 28 (AP)—A United States Justice Department investigation of fund-raising activities by the Kentucky Democratic party has ended with a decision not to prosecute anyone connected with the case, United States Attorney Eldon Webb says.

Mr. Webb said yesterday that the case "is a dead issue," adding, A determination has been made that there will not be further steps taken."

A General Accounting Office

VOTE PANEL ISSUES WARNING ON GIFTS

Independent Groups Are Told Individual Limit Is $5,000

Special to The New York Times

WASHINGTON, May 28—The Federal Election Commission warned groups conducting independent campaigns on behalf of political candidates today that they could not accept more than $5,000 worth of support a year from any individual contributor.

Although a policy statement made public by the agency did not identify any suspected violators, the commissioners were reportedly concerned that some political committees were soliciting much larger contributions under the belief that the practice was legal.

The Supreme Court ruled in January that Congress could not impose any spending limit on "independent" campaigns. These are supplementary efforts to promote a candidate by print or broadcast advertising that are conducted without his knowledge or consent by backers who have no connection with his regular organization.

But the new campaign law establishes a ceiling of $5,000 on the amount any contributor can give to a committee, other than the national committee of a political party or the authorized campaign committee of a candidate.

Under the new law, an individual would still be able to spend unlimited amounts of money on behalf of a candidate as long as the contribution was a private effort, such as a newspaper ad paid for personally.

Before that statute was enacted, the American Conservative Union said that it had received contributions above $1,000—the limit for direct gifts to a candidate—and some as high as $5,000—to support its Ronald Reagan of California in "independent" advertising campaign in support of former Gov. the Republican primaries.

The commission's policy statement, drafted at a closed meeting yesterday, said that the new $5,000 contribution ceiling applied to committees making independent expenditures, even though their total spendin was unlimited under the Supreme Court decision.

As a result, the limit also would apply to gifts to the kind of operation that supporters of Mr. Reagan conducted in the Texas primary, organizing a parallel committee called Delegates for Reagan that they maintained was independent of the candidate's organization and thus enjoyed freedom from spending ceilings.

This position is embodied in new regulations that the commission has made public since its reconstitution a week ago, but they will probably not receive the necessary clearance from Congress and acquire the force of law for another three months.

The commission also reported in the statement that no individual could donate a total of more than $25,000 a year to political committees, even if some or all of them were conducting unlimited independent campaigns.

Brown Sr. on Sidelines As His Son Campaigns

Continued From Page 1, Col. 8

be useful one way, he would be useful another. So he got on the phone to old campaign contributors and dictated letters to Democratic governors of his generation, not one of whom was still in office, asking them to use their influence for his son.

And while the present California Governor was out of state campaigning, the former Governor filled in for him on speaking engagements here.

Ever since, he has worried about every tactical decision and has stayed as close to the campaign as he could, but that has not been very close and he has never been consulted. In the two months since his son announced, he says, he has spoken to him perhaps six times on the phone and seen him only at fund-raising dinners.

At a dinner here Wednesday night, the former Governor was seated next to Mayor Thomas Bradley of Los Angeles when his son was swept into the ballroom on a tide of television crews and photographers and seated, finally, next to Candice Bergen, the actress. The candidate passed within inches of his father and the Mayor but seemed to see neither of them.

To avoid the appearance of a snub, Pat Brown urgently maneuvered the Mayor into the TV lights that were shining on his son, then stood aside, waiting his turn to say a few words. In that moment, he could have been mistaken for a contributor who wanted to be introduced.

Ovation for Father

The night before, at a dinner in San Francisco, the sensitive nerve ends of the relationship were even more exposed. The Democratic Presidential candidate mentioned his father only at the end of a long speech and in a manner that seemed offhand. But the former Democratic Governor rose to the evening's strongest ovation.

Later the son turned away brusquely when the father tried to get him to cut short a TV interview. And when Governor Brown was leaving the hall, his father had to remind him to say goodnight to his mother. "Laura, I thought I'd die," the senator Brown then said to no one in tones that were plainly exasperated.

But by the next afternoon, Pat Brown was boasting about his son's speech and the write-in votes he had accumulated in Oregon, which were not enough for the stunning victory Jerry Brown had sought there but twice as much as his father had imagined he might get.

At 71 years of age, the former Governor is well-tanned from the golf course and as exuberant, still, as most candidates the voters will see this year. That exuberance is not easily checked but he understands how it is with sons and can even find the words a son might use to talk about a father. "You love him," he said, "but you don't want to overwhelm him."

He paused but held on to the perspective. "You love him," he said again, "but you don't want to have anything to do with him." Perhaps there was a trace of bitterness in his words, but there was none in his voice. His son is not cold, he said.

"How the hell," he asked, "can a guy be cold that at 18 years of age will determine to enter the monastery to devote his entire life to God?" It was just that his son was undemonstrative, he said, a trait inherited from his wife's side of the family.

Decision to Quit Jesuits

"Jerry always buys birthday presents, Christmas presents for his mother," he said. "But then he comes in and just puts it down and says, 'A present.' Without even kissing her. It's a kind of inferiority complex with respect to human relations. He's just a little bit afraid to show love and affection. I'm just the opposite but, gee, Jerry and I have been very, very close."

The moment of closeness that came to his mind was a conversation in which his son confided his decision to leave the Jesuits after three and a half years of study for the priesthood.

Girls who have gone out with him that I've talked to really love him," the father went on. "But he's an individual soul—there's no question about that."

If he were asked, Mr. Brown would advise his son to reach out now to his elders — men like George Meany, Senator Edward M. Kennedy, Mayor Richard J. Daley and Senator Hubert H. Humphrey—in hopes of eventually getting their endorsements. But he is not sure what course his son will follow on his candidacy or on other matters such as Proposition 13, the hotly contested referendum question that seeks to block the further development of nuclear power in California.

The senior Mr. Brown is co-chairman of the committee to defeat the initiative. There is even a 30-second Pat Brown spot on television on behalf of the "no" vote. In the coming week, it will be competing for the attention of viewers with the Jerry Brown spots.

Conceivably, father and son could clash on other than this subliminal level, for the present Governor has yet to take a stand on Proposition 13. "He may just endorse it to counteract me," his father said. "He may just feel that I've identified him with the negative side."

The phone rang as the former Governor rose to see his guest to the door. Once he lifted the receiver, an expression of happy relief came-

Standards Bureau Nominee

WASHINGTON, May 28 (AP) — President Ford nominated Ernest Ambler of Bethesda, Md., today to head the National Bureau of Standards. Mr. Ambler has been acting director

MAY 29

Copyright (c) 1976 U.S.News & World Report
August 9, 1976
SECTION: NEWSLETTERS: NEWS You Can Use; IN YOUR PERSONAL PLANNING; Pg. 61
LENGTH: 410 words
HEADLINE: A complicated set of rules limits how much you can contribute to campaigns of candidates for federal office. But you can still give a lot, if you wish.;
DATELINE: Washington, D.C.
BODY:

Jimmy Carter, the Democratic nominee, has chosen to finance his campaign entirely from public funds provided by the income-tax check-off. That bars him from accepting any private donation for use in the campaign. If the Republican nominee also decides to use public funds, he, too, will be unable to accept campaign gifts from individuals.

Other campaigns. You are free, however, to donate money to candidates for the U.S. Senate and House and to other political committees -- up to specified ceilings. Under the Federal Election Campaign Act, as amended this year --

***You can give a grand total of $ 25,000 a year to federal candidates and political committees. Contributions to individual candidates or their campaign committees made or earmarked before or after 1976 for expenses of the 1976 election are treated as if they were made in 1976.**

*Individuals may contribute up to $1,000 per election to a candidate or his campaign committee. Only $100 may be in cash; the rest must be by check. For purposes of this ceiling, each of the following is considered a separate election: a primary, a general election, a run-off election, a special election or a party caucus or convention which has power to put a candidate on a general-election ballot.

*Your contributions to any other political committee are limited to $5,000 a year. An exception are gifts to national-party committees, which can total up to $20,000 annually. Included in this category: a party's national committee, the Republican and Democratic Senate and House campaign committees and any committee set up by a party's national committee, as long as it is not authorized by a candidate. For 1976 only, contributions made before May 11 to these groups do not come under the ceilings.

*There is no limit on what an individual can spend independently in support of, or opposition to, a federal candidate. But expenditures must be made without consultation with, or the co-operation of, the candidate or his agent. Check the special rules on independent spending. For further information, write or call the Federal Election Commission's Office of Information at 1325 K Street, N.W., Washington, D.C. 20463. In Washington, the telephone number is 382-4733. Elsewhere, the toll-free number is (800) 424-9530. Note: In addition to these rules for federal elections, many States have limits on gifts to candidates for State and local office.

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May 29, 1978

SECTION: Pg. 79
LENGTH: 1410 words
HEADLINE: Politicians Strike A New Bonanza
HIGHLIGHT:
Campaign funds are pouring in from business, unions and independent groups. The debate now: Is it good or bad for American politics?
BODY:

A flood of political campaign money is deluging candidates and pressure groups under relaxed ground rules that delight some and alarm others.

Corporation and private fund-raisers, operating under changed election laws and recent court decisions, are hustling to outdo labor unions in amassing millions of dollars to elect favored candidates. The vehicle for collecting these millions: political-action committees, known as PAC's.

For years it was illegal for corporations or unions to solicit political funds from employes or members. Unions got around the law by forming "educational" groups such as the Committee on Political Education (COPE) as a funnel for political contributions. Businesses reached the same end by setting up informal but often uniform "voluntary contributions" by executives to candidates' campaign funds.

The Federal Election Campaign Act of 1971 modified campaign-fund restrictions, and rules have since been loosened further.

Rapid surge. Only four years ago, there were fewer than 100 PAC's registered. Today, more than 1,600 corporate, labor, trade and nonaligned PAC's are on file with the Federal Election Commission. The figures is expected to hit 2,000 by the end of 1978.

During 1977, a nonelection year, the PAC's took in more than 33 million dollars, saving most of it to help congressional candidates this November. The total nears 70 million if money given to the two major political parties is counted.

Supporters of the revised campaign-financing regulations that touched off the sudden growth of PAC's exult over the effect. They contend that the new rules permit involvement of employes and stockholders who never before had a financial role in election campaigns.

Critics warn that the increasing emphasis on corporate and labor money threatens to wrap the political process. They make the argument that money alone - rather than a candidate's recognized ability, experience or beliefs - may determine who holds important elective positions.

Fred Wertheimer, vice president of Common Cause, a self-styled citizens' lobby, asserts that "special-interest money is rushing in" to PAC groups at a record clip. He warns: "In a few years, members of Congress will represent PAC's instead of constituents."

Dan Horgan, chief executive officer of the Democratic National Committee, sees the number of PAC's reaching 16,000 within a few elections.

Most political professionals insist, however, that they are not particularly alarmed about PAC's diverting money from the two major parties or their congressional-campaign treasuries. They note that individual contributors are limited by law to $5,000 a year per individual campaign or PAC plus $1,000 per election for an individual candidate and $ 25,000 total each year. There is no limit on what a candidate can donate to his own campaign.

The Federal Election Commission served notice on May 18 that it intends to enforce the law. The commission fined Gun Owners of America and two affiliated groups a record $11,000 for illegal use of corporate contributions for political activity.

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Still, the money unquestionably is flowing freely these days to PAC's and congressional-campaign committees. The Republicans have budgeted 25 million dollars for the 1978 elections, compared with 9 million for the Democrats. Corporate, union and other types of PAC's are expected to add at least another 50 million.

The growth of corporate political-action committees has been explosive. In the last three years, PAC's set up by businesses have increased from around 100 to more than 600, with more on the way. Among companies entering the political arena are some of the biggest names in U.S. commerce. Included: Alcoa, American Can, Anaconda, Bendix, Boeing, Boise Cascade, Bristol-Myers, Chrysler, Citicorp, Coca-Cola, Dow Chemical, Ford, General Electric, Goodyear, Kellogg, Kennecott Copper, McDonald's, Merrill Lynch, Mobil, Monsanto, Pan American, Pillsbury, Southern Railway, U.S. Steel, Wells Fargo, Weyerhaeuser and Sears, Roebuck.

And lesser known companies also are getting into the act - Alaska Airlines, Baltimore Gas & Electric, First National Bank of Topeka, Cleveland Cliffs Iron, Utica Mutual Insurance, Maine Central Railroad, Turtle Creek Convalescent Centres.

Where the money goes. The corporate PAC, however, has not been the bonus to Republicans that some Democrats feared. A study of the 1976 elections showed that only 58.9 percent of corporate PAC contributions went to the GOP. Union PAC's are weighted to favor incumbents - who already have a big advantage in congressional elections.

A Common Cause study reported that 68 percent of business-PAC money and 63.3 percent of labor contributions went to incumbents in the 1976 elections. Contrary to what might be expected, corporate fund-raisers favored Democratic incumbents over Republican challengers by a ratio of more than 2 to 1. The chief reason: Businessmen feared alienating the "ins" by siding with the "outs."

Common Cause and organized labor argue that public financing of Senate and House campaigns, as already exists for presidential races, is the best alternative to the current system. Says Common Cause's Wertheimer: "PAC money is largely incumbent money, and is tied to lobbying. Public financing is the only answer."

Albert J. Zack, spokesman for the AFL-CIO, claims that corporate power in politics also has been increased by a recent Supreme Court decision that gives company officials the right to spend unlimited funds to help sway the voting on issues of public policy.

Zack adds that PAC's have created a "whole new industry" of direct-mail solicitation for campaign funds.

Union officials assert that their major campaign contribution comes not in money but in the form of manpower - ready-built campaign structures plus people willing to do the humdrum jobs of getting out the vote. There is no legal limit on manpower in campaigns.

A 23-minute AFL-CIO film warns members of what it sees as a threat by the growing number of conservative PAC's financed by direct mail.

The Committee for the Survival of a Free Congress is one of those groups. It has a million-dollar budget for 1978, financed by an averaged contribution of $14. The organization will aid about 50 House and 10 Senate candidates this year, mostly Republicans and largely by in-kind support rather than direct cash. That type of help includes experienced field agents to aid in campaigns.

Paul Weyrich, director of the committee, credits an ideological opponent with starting the massive direct-mail campaigns. Says Weyrich: "George McGovern was the first on a national scale, in 1972, to understand that a lot of people had never been asked for a political contribution and were willing to give if asked."

Another big conservative money raiser, the National Conservative Political

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Action Committee, collected nearly 1.3 million dollars last year and distributed only $20,000. Committee officials explain that they intended it that way and are earmarking most of the money for lobbying and surveys to build a solid conservative base.

Seminar programs. On the corporate PAC front, three organizations - the Chamber of Commerce of the U.S., the National Association of Manufacturers and the National Federation of Independent Business - are conducted one-day seminars around the country on establishing and operating PAC's. Organizers report especially feverish interest by companies in the Midwest and West.

James D. "Mike" McKevitt, a former Colorado congressman now with the National Federation of Independent Business, says that corporate officials interested in forming PAC's are encouraged to give to challengers as well as incumbents, to Democrats as well as Republicans "if they support business."

McKevitt reports that businessmen, traditionally reluctant to engage in politics, are taking the plunge because they are "mad about Washington and their increasing costs."

Another head of a commercial PAC, however, says that businessmen still are not raising political contributions at anything close to their potential.

Virtually all the major figures behind the PAC boom - whether corporate, labor, philosphical or single-issue - agree that it is the most powerful force in politics today.

For better or worse, millions of dollars in fresh campaign funds are piling up, and a lot of politicians are going after it in the 1978 campaign.

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The Associated Press

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BODY:

A liberal-conservative coalition led by Eugene J. McCarthy and Sen. Gordon J. Humphrey, R-N.H., plans court challenges to some provisions of the Federal Election Campaign Act.

The first suit will ask the U.S. District Court here to strike down spending restrictions for individuals or groups acting outside a particular candidate's official campaign organization, McCarthy said Monday. He said future suits will seek to ban contribution limits for all challenging candidates and minority parties, to remove the $ 25,000 annual ceiling on campaign contributions by individuals, and to abolish special postage rates for the Democratic and Republican committees.

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BEYOND WATERGATE

Ten years after the Saturday Night Massacre, some critics are saying the post-Watergate reforms went "too far." The real story may be that they didn't go far enough.

By Patricia Theiler and Nina Easton

Watergate. You almost have to drag out the 10-year-old newspaper stories and read them again to believe it ever happened. Corporate money, some of it in cash and "laundered" checks, funneled illegally into election campaigns. Government wiretapping and spying on innocent citizens.

While subsequent investigations revealed that many of these abuses didn't start with Watergate, they were egregious under the Nixon administration. The extent of corruption that surfaced taught Americans a new lesson: Their government and many of its laws were in desperate need of reform.

Congress responded. Old ethics standards were reviewed; a host of new ones were introduced. In the decade since Watergate, Congress has overhauled rules governing everything from the way campaigns are financed to the kinds of information government makes available to citizens. Numerous reforms were enacted to restrict the role of money in elections, to open up government so citizens could better understand its policies and programs, to reduce government intrusion into the lives of private citizens and to subject government leaders to tougher standards regarding potential conflicts of interest.

In the past couple of years, however, post-Watergate reforms have been attacked by the Reagan administration and some Members of Congress. While neither has been able to amend key reforms, the administration has succeeded, through executive orders and other administrative changes, to substantially cut back on the amount of government information available to the public. The reason in many cases, say administration of-

Patricia Theiler is associate editor of Common Cause Magazine. *Nina Easton is a staff writer. The article is based on an upcoming report by Michal Freedman, CC associate director of Issues Development. Ron Brownstein, a* National Journal *staff writer, also contributed research to this story.*

ASSEMBLAGE BY ALEX LEWIS. PHOTOGRAPHED BY BOB GROVE.

"Watergate, and revisionists' effort to weaken or repeal the reforms, teach the need for constant public vigilance against not only the corrupting influence of power but also the cynicism of those who scorn the basic idealism of the American people."

—Archibald Cox, Former Watergate Special Prosecutor
Writing in *The New York Times*

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ficials, is national security. The White House, together with some in Congress, also has proposed legislation—which has so far been unsuccessful—to weaken laws governing overseas bribery and public access to information. Other ideas—to weaken enforcement of campaign finance laws and to limit public disclosure of federal officials' financial interests—have been proposed and dropped.

It's crucial to periodically review any law to judge its effectiveness. The post-Watergate reforms, with their far-reaching impact on the quality of government, are no exception. And as with any law, the post-Watergate reforms have some flaws. But now, on the tenth anniversary of the Saturday Night Massacre, when Watergate Special Prosecutor Archibald Cox was fired, take a close look at the reforms, the events leading up to them and their effect on the political process today. You may find that the real story is not that these laws went too far, but that they didn't go far enough.....

At about 9 p.m. on Saturday, October 20, 1973, two FBI agents entered the offices of then Watergate Special Prosecutor Archibald Cox, sealed the records and closed down the investigation.

The agents were carrying out orders from President Richard Nixon in a chain of events that came to be known as the Saturday Night Massacre.

In one of the most dramatic events of Watergate, Nixon tried to squelch Cox's investigation into the break-in at Democratic National Committee headquarters and the possible link to the White House by firing him. But Nixon's attempt to pluck the thorn in his side served mainly to spread the irritation.

When Nixon ordered Attorney General Elliot Richardson to fire Cox, he refused and resigned. Similarly, Deputy Attorney General William Ruckelshaus refused to carry out Nixon's orders and he, too, resigned. Finally, Solicitor General Robert Bork, next in the chain of command, did the dirty work.

At issue in the controversy was whether the president of the United States was subject to the same laws as any other citizen. President Nixon argued that he wasn't. He refused to hand over tapes of conversations and other records despite a court order, saying he didn't have to comply with the investigation because of "executive privilege." "If the president does it, then it can't be against the law," Nixon asserted even after Watergate had run its full course.

From the start, Cox and others disagreed with the president's claims of immunity from investigation. Cox argued that his job was to pursue all evidence even if it meant digging into White House files.

On the evening of his firing, Cox echoed his belief that the country's highest officer must be subject to the same laws as others: "Whether ours shall continue to be a government of laws and not of men is now for Congress and ultimately the American people to decide."

Cox's words proved prophetic. The courts ruled that not even the president could obstruct the judicial process and ordered Nixon to hand over the tapes of his conversations on Watergate. Eventually, Nixon surrendered the tapes.

Presidential accountability was just one element of the crisis called Watergate. Other abuses of power during the Nixon administration included violations of civil liberties and campaign laws and contempt for the public trust. By the end of the investigation, Nixon officials had pleaded guilty to crimes ranging from burglary and perjury to breaking campaign finance laws and distributing false campaign materials. President Nixon was forced to resign from office when the released tapes showed he had tried to stop the FBI investigation into the Watergate break-in.

But if the history of Watergate reads like a detective story, its conclusion echoes the principles found in any civics book.

Public outrage over the scandals convinced Congress to pass tougher laws designed to ensure that ours is indeed a government of "laws" not of "men."

From Dirty Money To Public Financing

Anyone who wants a refresher course in the corrupting influence of money in political campaigns need only look back a decade.

Several wealthy individuals who gave generously to Nixon's campaign—often in excess of $100,000—were later rewarded with ambassadorial appointments. The milk producers pledged $2 million to Nixon's reelection effort and, it was alleged, received a hike in federal milk price supports as thanks.

American Airlines made illegal contributions to Nixon's 1972 campaign while waiting to hear about a request it made to the White House for approval of a merger with another airline. A pledge by International Telephone and Telegraph to give $400,000 to the 1972 Republican National Convention was followed by a favorable ruling by the Nixon Justice Department on alleged antitrust actions by the multinational conglomerate.

And in 1972, campaign money may have even financed criminal activity. After the break-in at Democratic headquarters in the Watergate complex, investigations turned up thousands of dollars in campaign contributions that had been funneled into the bank account of one of the men arrested at the Watergate, Bernard Barker.

It was against this backdrop that Congress strengthened the Federal Election Campaign Act in 1974.

Congress had already enacted a campaign financing law that required comprehensive disclosure of all contributions over $100. The law was in effect barely two months when the Watergate burglars were apprehended.

The 1974 amendments were designed to strengthen existing laws by establishing public financing for presidential campaigns, limiting the amounts individuals and groups could contribute and setting up a nonpartisan, independent agency called the Federal Election Commission (FEC) to enforce the campaign laws that had been so easily evaded before.

For example, since 1907 corporations have been prohibited from contributing to federal campaigns (that prohibition was extended to labor unions in 1947), but the millions of dollars that corporations illegally funneled into Nixon's reelection effort suggested the law was not being taken seriously. The 1974 amendments made it far more difficult for a corporation to conceal illegal campaign contributions.

The 1974 provisions also sought to limit the influence of "fat cats" by capping the amount that an individual or group could contribute during an election. Today individuals can give up to $1,000 to a candidate for federal office in each primary and general election, up to $20,000 to a political party and up to $5,000 to individual political action committees (PACs). Between candidates, political parties and PACs, individuals are now limited in their annual giving to a total of $25,000. A PAC is limited to contributing $5,000 to a candidate for federal office in each primary and $5,000 in each general election.

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A key tenet of the 1974 reforms, of course, was public financing of presidential campaigns, a way to limit special interest influence over candidates. Each time you check off the appropriate box on your federal income tax form, $1 goes toward financing presidential campaigns. After raising a specified level of money from private donors, candidates in the primaries are eligible for matching federal funds. In the general election, major party candidates automatically qualify for federal funding; in return they must abide by spending limits. A proportional system of federal funding also exists for qualified minor party and independent candidates.

Though the 1974 reforms substantially cleaned up presidential campaigns, congressional campaigns—because they are not publicly financed—are still vulnerable to influence buying. Congress refused to establish public financing for its campaigns and opened the door for the explosive growth of political action committees by repealing a law that barred government contractors from creating PACs. In 1974 there were 608 PACs; today there are more than 3,400. And in 1982 PACs gave some $86 million to congressional candidates. PAC spending can determine not only congressional races, but also key legislative fights that deeply affect the public (see In Common, page 42).

With the scandals of Watergate receding in the public's memory, there was a recent—unsuccessful—attempt to challenge one key reform of 1974: Some Senate Republicans and the White House have considered plans to eliminate or reduce the powers of the FEC.

Even its proponents concede that the agency has been plagued by weak management and is in need of some reform to better enforce the federal election laws. However, those who want to eliminate the agency appear to want less enforcement, not better enforcement.

Campaigns aren't the only opportunity for monied special interests to buy influence. Honoraria—fees that special interests give to Members of Congress for speeches and articles—pose obvious conflicts of interest (*Common Cause Magazine*, July/August).

Lavish gifts from special interests also raised the specter of unethical attempts to influence legislation. The Koreagate scandal of the 1970s is a case in point. Its focus was a South Korean businessman, Tongsun Park, who dispensed thousands of dollars in cash and gifts to Members of Congress and other U.S. officials largely to influence federal policy on military and foreign aid.

Reacting to public outrage, Congress in 1977 clamped down on gift giving practices and honoraria. Congress prohibited its Members from accepting gifts worth $100 or more from foreigners or any individual or group with "a direct interest in legislation before Congress." Congress also stipulated that executive branch officials must turn over to the government gifts from foreign nations. Later laws required executive branch officials to disclose all gifts.

That same year Congress placed tighter limits than had already been enacted in 1974 on the amount of outside earnings Members could receive. The House later raised its ceiling; and the Senate repealed two ceilings—one in its ethics code and the other in a governing statute, therefore enabling senators to earn unlimited honoraria. Finally, in 1983 the Senate reinstated a ceiling on senators' outside earnings which is due to go into effect next January.

In 1968 the House and Senate had adopted the first financial disclosure law for Members in the history of Congress. But the requirements were limited. So in 1977, amid public concern over some Members' conduct, Congress began to require stringent and detailed disclosure of Members' finances.

The public can now find out who is giving gifts or speaking fees to a Member of Congress by looking through the Member's financial disclosure statement. But it is much more difficult to get a clear picture of the extent of special interest lobbying on Capitol Hill. That's because thousands of lobbyists are not registered, and hundreds of millions of dollars spent on lobbying are not reported.

There is a law, enacted in 1946, that requires lobbyists to register with Congress and file quarterly reports of the money spent and received in lobbying Congress. But the law has been so narrowly interpreted that many groups claim they are not required to file.

For example, groups and corporations such as the Chamber of Commerce, AT&T and Exxon claim they don't have to file reports even though they spend substantial amounts of money on lobbying activities, contending the law requires you to file only if your principal purpose is lobbying. They also claim the law doesn't apply to grass roots lobbying.

A case in point involves the recent battle in Congress over a proposal, scheduled to take effect July 1, 1983, to withhold taxes on interest and dividends. Thousands of individual

Reforming The System

1974 Congress strengthens the Federal Election Campaign Act.

1974 Congress strengthens the Freedom of Information Act.

1976 Government in Sunshine Act passes.

1976 Congress passes the Tax Reform Act, which includes a provision making information given to the IRS confidential.

1977 Foreign Corrupt Practices Act passes.

1977 Congress passes ethics codes that set tighter limits on honoraria and gifts and requires detailed disclosure of Members' finances.

1978 Ethics in Government Act passes.

1978 Foreign Intelligence Surveillance Act passes.

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banks, savings and loan institutions and credit unions nationwide conducted a massive lobbying campaign against the withholding plan, mailing millions of "statement stuffers" and congressional form letters to their customers advocating its repeal. Yet none of those individual institutions filed federal disclosure reports listing lobbying expenses during the six months at the peak of their lobbying campaign; and only two of the five trade associations spearheading the campaign disclosed significant lobbying expenditures.

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Behind Closed Doors

During the Watergate years the White House wasn't the only place where government business was hidden from public view. Before Congress passed the Government in Sunshine Act of 1976, agencies throughout Washington regularly conducted secret meetings where they made decisions on issues affecting Americans' everyday lives—from the price of natural gas to the allocation of the nation's air waves.

The Sunshine Act opened up a substantial amount of government business by requiring that the public have access to meetings at agencies headed by two or more officials. Sunshine provisions do not apply to Cabinet departments, because they are headed by one person, or the White House. But about 50 agencies, including the Federal Communications Commission, the Nuclear Regulatory Commission and the Consumer Product Safety Commission, must give advance notice of their meetings and, in most cases, permit the public to attend.

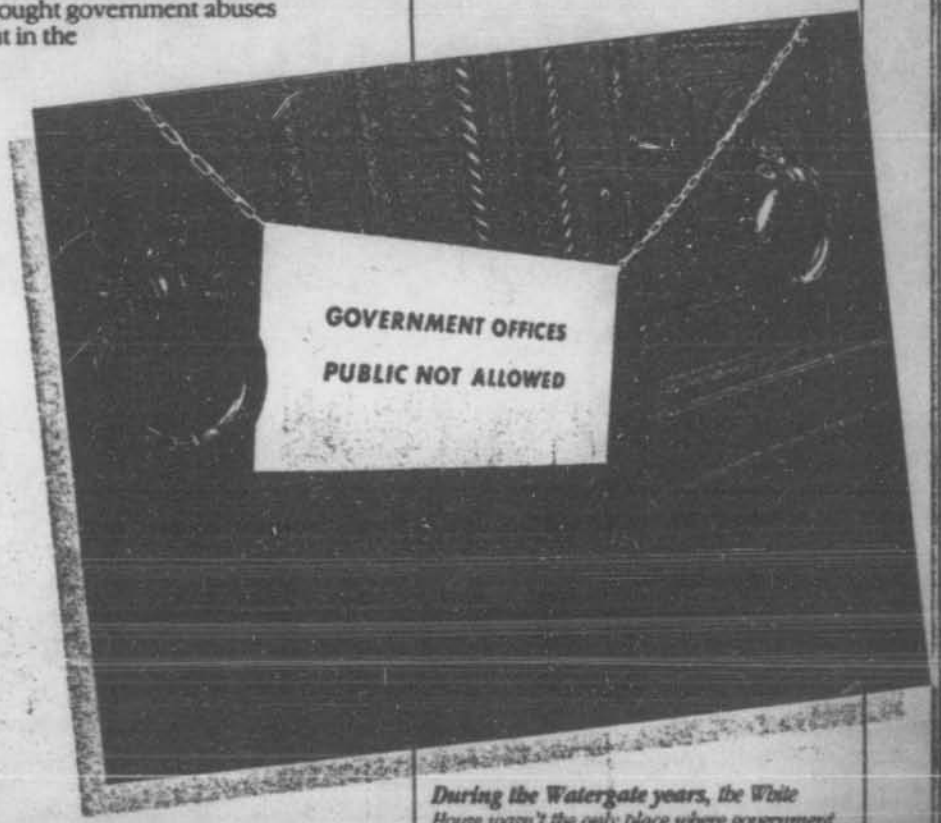
"With a few exceptions—national defense information, plans for criminal prosecutions or material that would constitute an invasion of privacy—there is no common sense reason why citizens shouldn't be able to watch how government spends their money and reaches decisions affecting their businesses, their communities and their future," Sen. Lawton Chiles (D-Fla.) has commented. "Citizens cannot hold government officials accountable if they don't know what those officials are doing."

As invaluable as it is, the Sunshine Act sometimes doesn't accomplish all it could. Some agencies have interpreted exemptions in the act as a way to close meetings that should be open. Reform advocates seek more rigorous enforcement of the law in the future.

They are also keeping an eye on the Freedom of Information Act (FOIA), which has been under attack. Right now anyone can obtain government documents on any number of subjects, provided release of that information won't hurt national security or disseminate trade secrets, among other things. Nearly a million FOIA requests are made each year by businesses, journalists, academics, public interest groups and other individuals.

The Freedom of Information Act has brought government abuses out in the open, informed the public about environmental hazards and provided an important tool for historians. Thanks to FOIA a Ralph Nader group was able to confirm, through Environmental Protection Agency documents it requested, that drinking water near New Mexico uranium mines had high levels of radioactivity and poisonous wastes. *The Philadelphia Bulletin* obtained results of an investigation by the Food and Drug Administration that showed that 10 patients in a Philadelphia nursing home had died while they were the subjects of drug experiments.

Prior to the 1974 FOIA amendments, agencies regularly levied fees for identifying and copying documents—fees that could run into the thousands of dollars—and the wait for documents was often extremely long. The 1974 provisions granted fee waivers in cases where a request was "in the public interest" and required agencies to respond promptly.



During the Watergate years, the White House wasn't the only place where government business was hidden from public view.

Now the White House and some Members of Congress want to weaken the law. The Reagan administration has already sent a directive to agencies that essentially changes a policy of "when in doubt disclose" to "when in doubt withhold" information. Diana Autin, director of the Fund for Open Information and Accountability, a New York-based group that assists people in using the act, says the new guidelines have made it more difficult to obtain information from the government. According to Autin, in some cases documents that were previously released automatically have been withheld; in one case a Japanese woman was denied access to most of the documents she requested on her deceased father's internment during World War II. "That information would have been automatically declassified under the old executive order," Autin believes.

In addition, the administration has issued guidelines making it more difficult to obtain fee waivers. When Coretta Scott King requested FBI records on herself and her husband, Martin Luther King, which she said she intended to place in the King library and archives in Georgia, she was denied a fee waiver. A TV reporter in Indianapolis received a $1,064 bill from the Department of Housing and Urban Development (HUD) after he used documents he had obtained through the FOIA to reveal a scandal at a local HUD office. A freelance writer who requested records on the CIA infiltration of the underground press in the 1970s received a bill for more than $60,000. (The fee was waived after he went to court.) All had been denied fee waivers because their requests weren't considered "in the public interest."

The administration also backs legislation, now pending before Congress, that would exempt more business and law enforcement records. And some administration officials, such as CIA Director William Casey, have suggested completely exempting the CIA from the act.

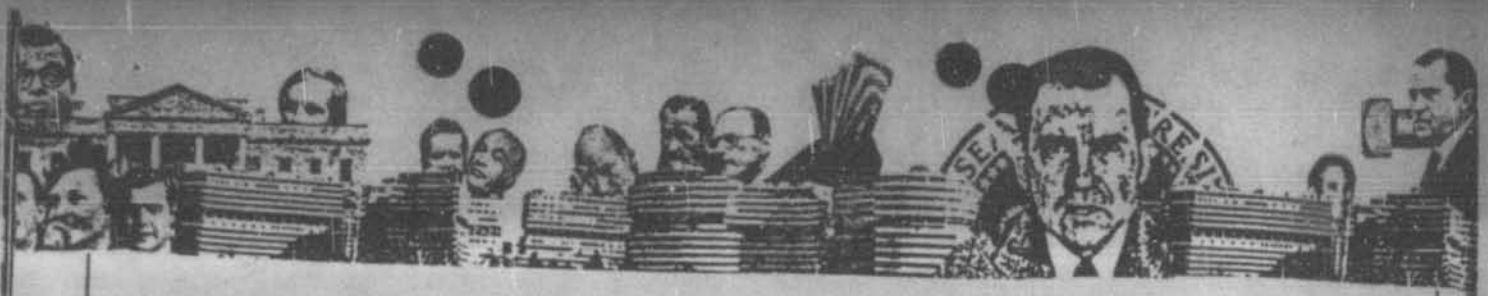
There are other ways in which secrecy is creeping back into government. Citing national security concerns, the Reagan administration has dramatically increased the use of classification to prevent information from being released. In April 1982 President Reagan signed an executive order that reversed recent government efforts to make it more difficult to classify federal documents. According to an analysis by the House Government Operations Committee, Reagan's executive order will increase the amount of information subject to classification, weaken the minimum standard for classifying information and drop the requirement that classifiers balance the public's need to know certain information against the government's need to protect it.

That order also gave the government the authority to reclassify documents that were previously declassified, something the Reagan administration has already done in some cases.

Just recently, the president signed another executive order on secrecy that says all employees with access to classified information "may be required" to submit to lie detector tests during investigations of leaks, even though the reliability of such tests is questionable (they are not permissible evidence in court in some states for that reason).

The order also says all officials with the highest security clearance must agree to preclear with the government

Residents of southern Utah *are using the Freedom of Information Act to obtain information to use in a court case to prove that the government knew about the dangers of above ground nuclear testing in nearby Nevada during the 1950s.*



Republic and Patrice Lumumba of Zaire.

In 1978, Congress passed the Foreign Intelligence Surveillance Act, which said the government had to seek court approval before wiretapping the home or office of an American citizen in this country.

But in other areas, the CIA and FBI retained a high degree of freedom. The FBI adopted only voluntary standards when it came to surveillance activities other than wiretaps (among them guidelines limiting full investigations to individuals or groups purporting violence).

Because the guidelines are voluntary, they can be modified, ignored or revoked if the public is less vigilant about civil liberties.

President Reagan has continually chipped away at domestic surveillance measures passed after Watergate. For example, a Reagan executive order signed in December 1981 now permits the infiltration of political organizations as long as the U.S. attorney general approves.

The same order greatly expanded the CIA powers to allow not only foreign but domestic intelligence activities as well. For the first time, the CIA has authority to conduct covert domestic actions. A coalition of religious, political, and educational groups are suing Reagan to eliminate the executive order.

The Internal Revenue Service has "more information about more people than any other agency in this country" in the words of former IRS Commissioner Donald Alexander. And, according to a report by the Center for National Security Studies, during several administrations the IRS conducted tax audits in order to harass individuals and organizations who had opposing political views—at the IRS' own initiative or the White House's or Congress' request. Among those targeted: the U.S. Commission on Civil Rights, the National Council of Churches, the American Library Association and Common Cause.

During the Nixon years, a special IRS staff targeted political organizations for tax purposes. The president asked the IRS to audit other individuals opposed to his policies—IRS officials have maintained that they resisted these efforts.

Presidents and others were able to manipulate the IRS for political purposes partly because tax returns weren't confidential and could be disclosed to federal agencies. In response to the litany of abuses, Congress passed the Tax Reform Act of 1976, which made tax returns and most other information gathered by the IRS confidential and subject to disclosure by the IRS only in rare cases.

Despite the law, and a "no" vote in the House in 1981 against allowing the practice, the Reagan administration has allowed the Selective Service System to use Social Security and IRS records to identify and locate young men who have not registered for the draft.

The Reagan administration also came under criticism when the Social Security Administration wrote letters to four million Supplemental Security Income recipients, asking them for the first time to authorize disclosure of IRS records on interest and dividends and warning that failure to release the information could affect their Social Security benefits. More than 90 percent of the recipients authorized disclosure; meanwhile, the SSA says no one has had benefits terminated for failing to respond. Senior citizens' organizations have criticized the letters for their coercive nature. The National Senior Citizens Law Center has contended in a lawsuit that the government's use of tax records for Social Security purposes is improper.

Above The Law

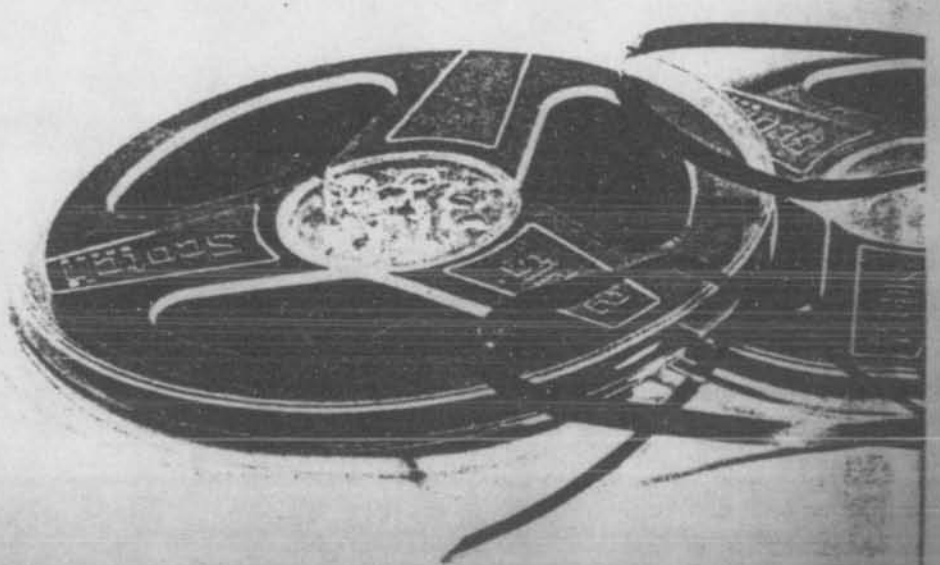
Americans were shocked when the Watergate trail led to the president himself. But the final lesson of Watergate was that the strength of the Constitution was greater than the will of the president.

The president tried to block the investigation of Special Prosecutor Archibald Cox by claiming that the president, as chief executive officer, didn't have to comply with the judicial process. The theory of separation of powers ensured the executive branch's independence from the judicial, Nixon argued.

However, the Supreme Court rejected Nixon's claims of absolute immunity from the law.

Besides affirming the Constitution's principle that the law, not the president, is the final authority, Watergate revealed the shortcomings of the investigations by the Justice Department, which had shown favoritism by keeping Nixon informed of the process of the FBI Watergate investigation.

The attorney general has divided



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for the rest of their lives any books, articles, speeches, testimony or even memos that draw on classified information. This would allow each successive administration to censor the work of its predecessors and could prevent former officials from issuing timely comments and articles on current events.

Overseas Bribery

The Lockheed Corp. paid at least $22 million between 1970 and 1975 to foreign officials and political leaders to obtain aerospace contracts....McDonnell Douglas Corp. made $1.6 million in secret commission payments on the sale of DC-10 jetliners to Pakistan and other countries in the early 1970s.

Among the disturbing disclosures made during the Watergate investigations was corporate bribery of foreign officials. In probing illegal contributions to Nixon's campaign committee, the Watergate special prosecutor discovered that several corporations maintained secret "slush funds" to purchase political influence in the U.S. and abroad. Subsequent investigations by the Senate Foreign Relations Committee and the Securities and Exchange Commission revealed that several hundred U.S. corporations had made questionable payments to foreign officials.

Foreign bribery, as it turned out, was a widely accepted practice. As A. Carl Kotchian, former Lockheed vice president, told a Senate subcommittee: "In our judgment, this was the only way we could sell our product."

Those disclosures led to the enactment of the Foreign Corrupt Practices Act of 1977. The act made bribery of foreign officials a criminal offense and required corporations to keep accurate records of their transactions.

While some business organizations have complained loudly that the law hurts their ability to compete in foreign markets, fewer than 1 percent of the corporations responding to a General Accounting Office survey claimed the act had had a significant negative effect on them. Nevertheless the administration supports legislation to weaken the law.

If Congress significantly weakens the act, charges Sen. William Proxmire (D-Wis.), one of the original law's authors, "Americans can once again do business overseas by bribery."

Big Brother Is Watching

President Nixon found many ways to use intelligence agencies to serve his own political purposes—at the expense of individual freedoms. For example, during the Watergate investigation itself, the FBI helped cover up the investigation by, among other things, destroying materials it had removed from the White House safe of Watergate plumber Howard Hunt.

But the abuses of civil liberties went beyond the Watergate break-in. The Nixon administration drew up a "political enemies list." Administration memos discussed the need to "use the available federal machinery to screw" them. The FBI used the cloak of national security to spy on many citizens and members of the press, such as four newsmen who were wiretapped from 1969-1971 to discover the souce of leaks of classified information.

The Watergate investigation revealed that the intelligence agencies had been abusing their powers during several administrations. A congressional investigation into violations of civil liberties by the FBI and CIA described the agencies' methods of operation as "occasionally reminiscent of the tactics of totalitarian regimes."

In 1964, for example, the FBI bugged the hotel room of civil rights leader Martin Luther King Jr. as part of a campaign to destroy his reputation. According to Frank Donner of the American Civil Liberties Union, the FBI burglarized close to 7,500 homes and offices from the early '40s to the early '70s in order to steal information or install wiretaps.

During the Watergate investigations, it was revealed that the CIA, officially the *foreign* intelligence arm of the government, kept records on 300,000 persons in this country and infiltrated black, antiwar and political organizations. Even public officials, including Supreme Court Justice William Douglas, Rep. Claude Pepper (D-Fla.) and former Rep. Bella Abzug (D-N.Y.) were monitored.

During the Watergate investigations, it was also discovered that the CIA reviewed more than 28 million letters and opened more than 200,000 letters during a 20-year period, despite a criminal statute prohibiting mail tampering. The CIA even checked out the correspondence of President Nixon, along with that of Sen. Hubert Humphrey (D-Minn.), Federal Reserve Board Chairman Arthur Burns, Sen. Frank Church (D-Idaho) and novelist John Steinbeck.

CIA activities weren't limited to spying, however. Between 1953 and 1963, the CIA tested behavior influencing drugs, such as LSD, on unknowing subjects—experiments which killed one man and induced unknown heartache in other victims. Americans also were shocked to learn that the CIA stretched its mandate to include plotting the assassinations of foreign leaders, including Fidel Castro, Rafael Trujillo of the Dominican

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loyalties that make it necessary to appoint an independent investigator who can't be reined in by the president when investigating top officials.

Even now, the U.S. attorney general is the nation's chief law enforcer *and* a political appointee *and* primary legal adviser to the president.

The 1978 Ethics in Government Act authorizes an independent, court-appointed prosecutor, who can't be fired by the president, to investigate suspected criminal behavior by high government officials.

Despite the obvious and proven need for the special prosecutor in cases such as Watergate, President Reagan called for repeal of this provision, but Congress extended the legislation which calls for a special prosecutor in these cases.

Conflict Of Interest

The Watergate investigations also shed light on illegal payments made to government officials by outside interests. This raised concerns about potential conflicts of interest, or cases where an official's decisions have a direct bearing on his or her own pocketbook.

Even before Watergate, laws prohibited executive branch officials from making decisions where they had a conflict of interest. But there was no way to enforce the law because officials didn't have to disclose their holdings. One investigation in 1976 revealed that an oil engineer in the Department of Interior owned stock in oil companies at the same time that he was monitoring oil company operations on federal leased lands.

As a result of this and other cases, Congress in 1978 passed laws requiring the president, vice president, Members of Congress and others to disclose their financial holdings in annual reports. It also created the Office of Government Ethics to review these reports for potential conflicts of interest.

The Reagan administration has criticized the law as an invasion of privacy. Early on in the administration, Reagan's ethics adviser, Fred Fielding (former deputy to Nixon White House Counsel John Dean), recommended that disclosure reports be available exclusively to congressional committees. But without public disclosure, Americans probably wouldn't have learned, for example, that CIA Director William Casey traded heavily in the stock market in 1981 while privvy to classified information that could affect stock prices. Public pressure forced Casey to put his holdings in a blind trust—a step that many top officials take to assure compliance with the conflict of interest laws.

Revolving Door

The ethics laws passed after Watergate also included provisions to limit potential conflicts of interest created by the "revolving door syndrome," which encourages executives to pass in and out of jobs in industries and the government agencies that regulate them.

The Ethics in Government Act bars some former top officials who take jobs in the private sector temporarily from conducting business with their former agency.

Among the greatest users of the revolving door are former Department of Defense (DOD) officials and former military officers who take jobs with defense contractors. While there are conflict of interest statutes which cover Pentagon officials, many, including Sen. William Proxmire (D-Wis.), feel they haven't been adequately enforced. That's why Proxmire persuaded Congress to approve a reporting requirement—open to the public—to help identify potential conflicts and to serve as a deterrent.

DOD officials are required to report their job changes on a simple disclosure form. The Reagan administration and DOD are trying to eliminate this limited form of monitoring.

Congress, meanwhile, has not made any serious effort to deal with the revolving door problem on Capitol Hill. The Senate does prohibit its Members from contacting senators as paid lobbyists during the year after they leave office. However, Members aren't prohibited from eventually returning to the Hill as highly paid lobbyists. Defense contractors, among others, are more than happy to fill a lobbying slot with an ex-Member, particularly one who has served on one of the defense committees. In fiscal year 1981, eight of the top nine defense contractors employed ex-Members who had served on the Armed Services Committee or on the Appropriations Defense Subcommittee. ●

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National Journal
May 5, 1984
SECTION: CAMPAIGN REPORT 1984; Vol. 16, No. 18; Pg. 873
LENGTH: 3507 words
HEADLINE: Another Campaign, Another Loophole -- This Time, It's Delegate Committees
BYLINE: BY MAXWELL GLEN
HIGHLIGHT:
The issue is whether federal campaign laws allow committees to promote candidacy of convention delegates to spend on behalf of the candidates they support.
BODY:

Campaign money and how it is used by supporters of Walter F. Mondale may not prove to be a sufficiently lucrative political issue to revive Gary Hart's struggling presidential campaign in the final month of the presidential primary season. Nevertheless, the Colorado Democrat has helped focus attention on a loophole in the campaign finance law that, if it hasn't already, could become significant in election years to come.

At issue is the independence of committees formed by individuals to further their election as delegates to the national party nominating conventions.

In 1980, the Federal Election Commission (FEC) permitted these delegate committees to raise funds in the same ways that any political committee can as long as they spent the money only for specific kinds of grass-roots activities.

But the commission was less than clear on the extent to which the groups could operate in conjunction with the presidential candidate under whose banner the delegates are running. As a result, the FEC may have to decide whether the way the delegate committees are being used is illegal -- or at least not in keeping with the spirit of the election law reforms.

In 1980, relatively few groups of delegates formed committees. This year, however, more than 120 have been formed in at least 19 states by delegate candidates who support Mondale. By mid-April, the committee had raised and spent $400,000-$500,000 -- with most of the money coming from labor union political action committees (PACs) -- and with some evidence of guidance from the Mondale camp.

None of the delegate committees' spending counted against the Mondale campaign's own expenditure limits. Candidates who accept federal matching funds may spend only $20.2 million, plus an additional $4 million for fund-raising costs, by convention time.

Even if the highest estimates are accepted, spending so far by Mondale delegate committees pales next to the $13.3 million the Mondale campaign spent through the first quarter of 1984.

Moreover, labor will probably spend as much, if not more, money on "communications" with its members in support of Mondale's candidacy.

But Hart, who was the first presidential contender to disavow PAC contributions, has seized upon the delegate committees' acceptance of labor PAC contributions to step up his attack on Mondale as a tool of special interests. In Austin, Texas, last month, Hart contended that "the treasury of organized labor has virtually become the treasury of the Mondale campaign."

Hart cites links between the delegate committees and the Mondale campaign to support his contention that the committee's expenditures ought to be counted against the candidate's spending limits. On NBC's Meet the Press, he asserted, for example, that Mondale staffers had been effectively transferred from the campaign to the committees, raising "serious questions . . . on whether or not this is even in violation of the laws of the United States."

Mondale, who has also forsworn PAC contributions to his campaign, had, once

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the word of their activities had become public, asked the delegate committees, "as a matter of policy," not to accept PAC funds. At the same time, however, he has continued to insist that the groups functioned within the law.

On April 27, he went further, saying he would return about $300,000 contributed to the committees, including all PAC gifts, and count all committee expenditures against his campaign's legal spending limit.

CREATING A LOOPHOLE

Ultimately, the FEC will have to decide for itself the issue of whether the delegate committees must be independent of the candidates. Americans with Hart, the candidate's campaign committee, filed a complaint with the commission last month, but a high-ranking FEC official said that a ruling would probably not come until after the Democratic convention that begins in San Francisco on July 16.

Each side of the debate contends that it has correctly interpreted commission regulations governing delegate fund raising and spending.

Yet FEC sources concede that the commissioners may have overlooked some key questions in their rule making. For example, did the commission intend that delegate committees, whose participants are often closely affiliated with a presidential candidate's local organization, should function with total autonomy, or is autonomy required only when they make independent expenditures on the candidate's behalf?

Similarly, to what extent can a delegate committee include information about a presidential candidate in its own literature without changing the true purpose of that literature, which is ostensibly to promote the delegates' election?

"It's a sticky issue," the FEC official conceded.

Rep. Bill Frenzel, R-Minn., an author of 1979 legislation that generally encouraged certain expenditures for grass-roots political activity, says that Congress may have committed an oversight as well. "Clearly there is a loophole," he said. The delegate committee controversy "was something we didn't envision under the law"

In fact, the delegate committee imbroglio can be traced to an afterthought by federal regulators.

In its last major effort at campaign finance reform, the 1979 amendments to the Federal Election Campaign Act, Congress permitted the national political parties to transfer funds to state and local parties for grass-roots political activities such as the use of car bumper stickers, buttons, handbills and lawn signs. Congress acted after both parties contended that amendments to the campaign finance law in 1974 and 1976 had frozen out such spending by forcing campaigns to focus their resources on mass media.

Implicit in the 1979 law was a call for more voluntary political activity in general. But the statute included no provision for grass-roots activities by delegates and delegate candidates.

In a 1980 advisory opinion that was subsequently written into regulations, the FEC addressed the oversight.

Because delegates do not seek federal office, the commission ruled, the money they spend to advocate their own election could not be subject to federal expenditure limits or reporting requirements. It added, however, that contributions to delegates could come only from authorized sources -- for example, from PACs but not from corporation or labor union treasuries -- and that they were chargeable against an individual donor's $ 25,000 annual contribution limit.

Meanwhile, the FEC advised, slates of delegates could set up their own political committees. And, if they spent more than $1,000 during a calendar year, the committees became subject to federal contribution and reporting requirements.

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The rules also said that delegate candidates and, by inference, delegate committees could spend unlimited funds on public communications media -- billboards, radio, television and newspapers -- in which they promoted their own candidacies and included information or references to the presidential candidates of their choice. But such expenditures would be considered in-kind contributions to the candidates if they were made with the candidates' assistance or express approval.

Delegates and delegate committees could also spend unlimited funds on materials for grass-roots political activity -- buttons, bumper stickers, handbills and the like -- that included information about a presidential candidate along with a plug for the delegates themselves.

In its regulations, however, the FEC did not explicitly provide for penalties for delegates or delegate committees that coordinate with a presidential candidate on expenditures for such materials (although the rules do state that republication of campaign literature undertaken with a candidate's express approval is chargeable against the candidate's expenditure limits).

Whether this broad exception was intentional or simply an oversight, it is the loophole through which the Mondale delegate committees slipped.

THE MONDALE COMMITEES

Very little delegate committee activity was reported in 1980. By the time the rules became effective, in early August of that year, Ronald Reagan had already been nominated in Detroit and President Carter had accumulated enough committed delegates to be virtually assured of renomination. According to political scientist Herbert E. Alexander, in his book, Financing the 1980 election (Lexington Books, 1983), most delegate expenditures that year were unreportable.

It took a full-fledged and closely contested campaign to bring out the implications of an ambiguous law.

FEC records show that virtually every one of this year's delegate committees registered with the commission after the Feb. 20 Iowa caucuses and the Feb. 28 New Hampshire primary. By that point, Mondale had been spending at a rapid pace in anticipation of an early knockout of his rivals for the nomination. Hart's strong showing in Iowa and his resounding victory in New Hampshire suggested, however, that the contest would be a lengthy -- and costly -- affair.

Delegate committees gave Mondale an ostensibly legitimate way to underwrite the expenses of his delegate slates while relieving his campaign of some of its own grass-roots activity costs.

New Hampshire Second District Delegates for Mondale, which set up shop in January, was the first such group to organize.

Long before the primary season began, however, Mondale campaign officials had already anticipated that delegate committees could come in handy. Last summer, they reportedly first considered establishing delegate committees. The campaign's general counsel, David Ifshin, is said to have given the committees his stamp of approval. In December, according to a senior Mondale aide, the campaign told its delegate slates that delegate committees were permissible.

In the same month, the FEC issued a newsletter in which it outlined the rules under which such committees must operate.

On Jan. 12, Mondale's chief delegate coordinator, Elaine Kamarck, outlined the dos and don'ts of delegate committees in a memorandum to Mondale delegates. In her advisory, she wrote that PAC contributions to the committees were "permitted."

"Please follow the instructions on the enclosed memorandum," Kamarck wrote, "and when in doubt, do not hesitate to call the office of the legal counsel here at the campaign headquarters."

For Hart campaign officials, the Kamarck memo was a smoking gun, evidence that Mondale intended to make the delegate committees an adjunct to his

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campaign. More such evidence emerged in the form of an April 5 fund-raising letter from Charlene Drew Jarvis, chief of the Mondale D.C. Delegate Committee, in which she said her committee had been established "with the assistance of the Mondale national campaign office."

FEC records, in fact, reveal an extensive pattern of cooperation among the committees, the Mondale campaign and organized labor, primarily but not exclusively in states where delegates are selected in direct elections or at caucuses.

By mid-April, the 19 states in which delegate committees had formed were Arizona (which had one committee), California (2), Colorado (1), Florida (15), Idaho (1), Illinois (20), Indiana (1), Kentucky (1), Maryland (10), Michigan (1), Montana (1), New Hampshire (2), New York (32), Ohio (3), Pennsylvania (22), Rhode Island (2), Texas (4), Virginia (1) and Wisconsin (2).

In most of these states, delegates to the national conventions are chosen directly by the voters in the polling booths or in party caucuses and conventions. The exceptions are Indiana, New Hampshire and Ohio, where delegates are chosen before primary elections or in post-primary caucuses and, in effect, do not compete for election.

Most of the heaviest delegate committee activity has occurred in states that have already had their primaries and in states where union members account for large portions of many delegate slates.

Most delegate committees had reported less than $10,000 in receipts by mid-April. Among the exceptions were At Large Delegates for Mondale, in New York, which received $37,500 (all but $1,000 from labor PACs) in a three-week period ending April 15; Pennsylvania At Large Delegates for Mondale, which received $28,500 in the first three months of the year; and the committee in New Hampshire's second congressional district, with almost $60,000 in receipts.

Virtually every delegate committee has relied on local contributors for some of its cash flow. The level of individual contributions, however, has been minimal. The lion's share of delegate committee receipts have come from labor PACs and transfers from other delegate committees.

Four AFL-CIO affiliates with large shares of slated delegates -- the American Federation of State, County and Municipal Employees, the American Federation of Teachers, the Communications Workers of America and the United Auto Workers -- have contributed more than any other labor organizations. The teachers' union, for example, concedes that it gave more than $54,000 to 38 committees before deciding, at Mondale's request, to cease its assistance. According to a count by The Wall Street Journal, the government workers union has spent more than $43,000, and the auto workers at least $33,500.

Labor officials say the unions have spread most of their money in states where they have members running for delegates. For example, the teachers' union, with 85 delegates in all, boasted 20 slated delegates in New York, 10 in Florida and 6 in Illinois. It contributed $21,600 to delegate committees in New York, $9,500 to committees in Florida and $6,500 to Illinois committees.

"We've only contributed to our own," said Rochelle Horowitz, political director of the teachers' union, who added that her group's large member base in early primary states was another reason for its relatively high expenditures. Ben Albert, a spokesman for the AFL-CIO's Committee on Political Education, said his group had similarly focused its contributions.

Delegate committees have also relied on each other. The Pennsylvania committee, for example, received $2,500 from a counterpart in New Hampshire. In turn, it gave $8,500 to nine other Mondale delegate committees inside the state and out.

Most committee-to-committee transfers have followed the primary schedule. Two days after the March 20 Illinois primary, for example, 22nd Congressional

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District (Illinois) Delegates for Mondale sent $1,000 to a delegate committee in Kansas, which held caucuses on March 24 and April 14. After the New Hampshire primary, New Hampshire Second District Delegates for Mondale made disbursements of more than $12,000 to Mondale delegate committees in Florida, Illinois and Pennsylvania.

HART'S COMPLAINTS

Along with efforts by national labor organizations, the timing of these financial transfers and reports to the FEC has given Mondale's critics some of the ammunition for their allegations that the delegate committees have been centrally operated. (For example, of the 19 reports by Illinois-based Mondale delegate committees filed with the FEC by April 4, 16 had been hand-delivered on March 7 in envelopes stamped with the same "Illinois for Mondale" address).

Other evidence of centralized control has come in the form of staffing expenditures. Shortly before the April 7 Wisconsin caucuses, the Wisconsin At Large Delegate Committee paid the salaries of at least eight staffers who, earlier that month, had received paychecks from Mondale's campaign committee. The Wall Street Journal reported on April 20 that more than 30 Mondale staffers had switched to the payrolls of Mondale delegate committees, a report confirmed by an aide in Mondale's central field office.

"Staff members have in effect been transferred from the national campaign to these independent committees, but paid through the back door," Hart said on Meet the Press on April 22.

In at least one instance, a Mondale aide was working for both the campaign committee and a delegate panel. Millie Bruner acted as treasurer for a Mondale delegate committee, now closed, in Dallas while also running a phone bank operation for Mondale's Texas campaign.

Some campaign finance experts say that such coordination may constitute grounds for legal action.

"If delegates raise and spend money and coordinate with the [presidential candidate's] campaign, their spending should count against the candidate's limits," said Jan Baran, an executive assistant to former FEC chairwoman Joan D. Aikens and now chairman of the American Bar Association's Committee on Election Laws.

In an April 9 memorandum to Hart campaign manager Oliver (Pudge) Henkel Jr., the campaign's general counsel, John M. Quinn, made the same argument. "Since these committees are set up by the same group of persons, they should be considered as affiliated with one another," Quinn wrote. "Accordingly, their expenditures on behalf of the Mondale candidacy, which constitute in-kind contributions to the Mondale campaign, are limited to $1,000 in the aggregate."

FEC records do not show that much, if any, of the delegate committee resources have gone to newspaper, radio and television advertisements or billboard space. In one case, that of Illinois's 4th Congressional District, the delegate committee spent $455.92 on March 15 (five days before that state's primary) for an advertisement in the Joliet News.

If conducted in coordination with the Mondale campaign, such advertisements would constitute a violation of laws governing independent expenditures.

Quinn contends that many of the "grass-roots" materials paid for by delegate committees are indistinguishable from the usual pro-Mondale literature -- a charge borne out by the materials themselves. Handbills, newsletters and other campaign paraphernalia have, in many cases, mentioned the delegates only in the fine print while touting Mondale's candidacy in big headlines.

"There are at least serious questions whether this limitation is being complied with," Quinn said, "because the large expenditures by these committees appear to include at least a consequential portion devoted to promotion of Mr. Mondale's candidacy."

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Quinn insists that this use of campaign materials stretches the intent of delegate spending rules. "The [election] commission fashioned a limited exception to expenditure and contribution limitations for individuals to further their own candidacies for delegates . . .," he said. "To allow delegates to band together in the type of nationally coordinated offensive the Mondale campaign is conducting here inflates that exception so much as to rob the limitations . . of any force."

To many Mondale supporters, however, the emphasis on the candidate seems only logical. "You don't promote the delegate without promoting the candidate," said David M. Valderrama, head of the 4th District Delegates for Mondale in Maryland. "As a matter of fact, I'm promoting Mondale first."

IN THE FEC'S COURT

The nature of the delegate-candidate relationship will be among the issues when the FEC takes up Hart's complaint. But it will also have to examine the delegate selection process, the extent to which delegate activities can be restricted under federal law and its original intentions for delegate committees.

Citing transcripts from 1980 FEC deliberations on the delegate activities rules, the Hart forces contend that the commission believed delegate expenditures made with the approval of or guidance from a presidential candidate's campaign ought to be counted as in-kind contributions. At a Feb. 14, 1980, meeting, for example, assistant counsel Patricia Fiore said, "Expenditures which are in cooperation, consultation or concern with, or at the request or suggestion of the candidate are contributions."

But a veteran FEC official contends that commission members were not so sure. "There was a lot of talk about delegate committees" during the original rule making, he said. "But they didn't know how to deal with it.

"Delegates, by their nature, have always been a gray area. It's probably grayer this year because you don't have to vote for [a candidate] on the first ballot" at the national convention.

Though Mondale has felt compelled to call for termination of his delegate committees, it is unclear whether he will suffer in their absence. With a string of primary victories in big states, Mondale enjoys a comfortable lead in delegates. While the big states to come, with their high media costs, could squeeze an already tight campaign budget, past experience does not necessarily bode ill for the front-runner. Four years ago, for example, Reagan's campaign had already reached 75 per cent of its federal spending limit by April 1.

But even if the issue proves to be no more than a political tempest in a teapot this year, the senior FEC official warned that delegate committees, if not restricted more explicitly, "could become a serious loophole, maybe not this year but certainly in the future, as people figure out how to use them better."

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Copyright (c) 1984 National Journal Inc.;
National Journal
July 21, 1984
SECTION: NATIONAL JOURNAL CONVENTION SPECIAL; Pg. 5
LENGTH: 572 words
HEADLINE: The Democratic Party's 'Fat Cats' Are Back
BYLINE: By Robert Walters
BODY:

Like virtually everything else in the marketplace, presidential nominating conventions just aren't as cheap as they once were. In fact, they've become outrageously expensive.

Gone forever are the days of nickel cigars, dime telephone calls, $4,000 autos and quadrennial political conventions with a bargain price of $10 million or less.

This year's Democratic National Convention will cost about $20 million, and the price of the Republican National Convention in Dallas is expected to be about $15 million.

Soaring expenses have forced both parties to turn increasingly to funding from various public treasuries and to "creative financing" schemes designed to provide tax breaks and other inducements to potential private donors.

The principal cause of those ambitious fund-raising schemes is the Federal Election Campaign Act, the statute that constrains the financial activities of national-level candidates and political organizations.

The law, for example, authorizes a maximum of $6 million in federal funds to be given to each major political party to assist in paying convention bills.

On June 29, just before the convention recess, Congress approved a bill that would allow each party to spend an additional $2 million in federal funds.

The city of San Francisco produced another $7 million from its municipal treasury for the Democrats, but the party still faced a $5 million shortfall.

Both major parties, however, convinced the Federal Election Commission to issue a legal opinion authorizing convention "host" committees to collect unlimited amounts of tax-deductible contributions from individuals, corporations, labor unions and other benefactors.

Although the campaign law specifically limits individuals to contributing a maximum of $ 25,000 per year to all federal candidates and political committees, the commission's ruling circumvented the law the agency is supposed to enforce.

As a result, the Democrats were able to enlist eight "fat cats" who each agreed to raise or donate at least $250,000 to underwrite convention costs.

In return for their generosity, all of those wealthy individuals were designated "honorary convention co-chairmen," a title whose perquisites included access to the convention podium -- an area traditionally off limits to all except speakers and selected party officials.

All contributors of $5,000 or more were given special passes to a hospitality room in a posh San Francisco hotel and to a VIP suite at the convention hall -- both stocked with an unlimited supply of food and drink -- as well as invitations to a series of parties.

Those who gave $10,000 were invited to a reception with the party's presidential nominee following his acceptance speech, while $ 25,000 contributors were included on the guest list of a special dinner party that evening.

Those who donated $50,000 were given access to special "skybox" lounges ringing the convention floor, while 100,000 contributors had an opportunity to be photographed with the presidential nominee.

Although the campaign law prohibits contributions from corporations to

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national political committees, the new exemption paved the way not only for direct donations but also for the sale of corporate sponsorships.

As a result, the Democratic convention for the first time has an "official" airline, an "official" courier service, an "official" bank and even an "official" piano.

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Daily Report For Executives
November 12, 1985, Tuesday
SECTION: REGULATORY AND LEGAL DEVELOPMENTS; Federal Elections; DER No. 218; Pg. A-7
LENGTH: 753 words
HEADLINE: WITNESSES CALL ON CONGRESS TO EXPAND FEC'S POWERS, CURTAIL MAJOR PARTY DONATIONS

BODY:

Members of Congress, law firms, and public interest group called on legislators Nov. 7 to expand the powers of the Federal Election Commission and to make it illegal for national political parties to use state and local campaign organizations to divert millions of dollars for federal elections.

FEC officials testifying before the House Administration Elections Subcommittee welcomed the proposals to expand post-Watergate election laws, but at the same time warned legislators that without greatly increased budget authority, the agency will have problems enforcing the law similar to those now being experienced because of insufficient funds and the explosion of political action committees (PACs) since 1980.

FEC Chairman John McGarry told the panel during a one-day oversight hearing that his agency has improved timeliness in dealing with its growing workload, but "there are still many activities and projects the commission ought to undertake which are impossible due to our exceedingly tight budget." For example, McGarry said, because of "shortcomings" in its computer data base, the agency is not possible to monitor the $ 25,000 overall annual contribution limit on individuals unless violations are brought to FEC's attention.

Other witnesses told the panel that FEC's problems were not just monetary. The agency needs better guidance from Congress on how to do its jobs, said Rep. Howard Nielson (R-Utah). He said that FEC also needs better guidance from Congress about the focus at the agency.

Rep. William Cobey (R-NC) echoed Nielson's testimony and also said that FEC has "an apparent readiness to tightly regulate voluntary participation while lacking a similar eagerness to tightly regulate involuntary political participation" in federal elections. Specifically, he cited the collection of union dues, which often are used by union PACs to support or oppose candidates for federal office.

Although courts have ruled that unions may not use employee dues for political purposes, FEC has not written regulations to carry out the court rulings, Cobey said.

Rep. William Ford (D-Mich) proposed two ways to make FEC more effective in discharging its duties. Ford suggested that Congress amend the 1971 Federal Election Campaign Act to require candidates for federal office to issue disclosure statements once they have received $5,000 in campaign contributions. The current "trigger" for such reporting is $10,000.

Ford also would limit the amount of funds candidates may receive during primary and general elections. Current law allows candidate's committees to accept $1,000 from a person and $5,000 from a multicandidate PAC during any election. "As a practical matter, and absent a runoff, in an election cycle individuals may contribute $2,000 to a nominated candidate and multicandidate political committees may contribute $10,000," Ford said.

To help control the amount of funds directed to candidates for federal office, Ford suggested that Congress limit acceptable contributions to $1,000 for individuals and $5,000 for PACs.

To avoid getting around either current law or future changes, Ellen Miller, executive director for the Center for Responsive Polities, urged legislators to tighten up FEC rules involving so-called soft money, which involves funds that

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indirectly support federal candidates.

Miller said that because soft money is not disclosed "in any meaningful way," FEC contribution limits can be escaped. For example, Miller noted that monies collected by national parties are not supposed to be directly used to support or oppose individual candidates for federal office. However, Miller said, a study by her group showed that monies can be channeled to the state level and re-directed to federal candidates (Report No. 217, A-18).

Although FEC officials are aware of problems associated with soft money operations, Miller said the agency has "avoided any meaningful disclosure" by the national parties nor issued clear guidelines regarding the allocation and use of overhead expenses or various party building expenses shared by federal and non-federal parties. "It is a classic case of reluctance on the part of the commission to act decisively," Miller said.

Bill Oldaker, a lawyer with Epstein, Becker, Borsody & Green, said that FEC needs to better manage its resources and spend more time investigating possible abuses and clarifying existing regulations related to the uses of contributions, particularly involving PACs.

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Legal Times
February 2, 1987

SECTION: ANALYSIS; Pg. 11
LENGTH: 3743 words
HEADLINE: Court Erases Ban On Political Spending By Advocacy Groups
BYLINE: BY JONATHAN EPSTEIN; Jonathan Epstein, a Washington, D.C., attorney, is employed by the Federation of Tax Administrators, an association of state tax departments. Between 1983 and 1986, he was an associate at a law firm that concentrated in the area of campaign finance regulation.

HIGHLIGHT:
Striking down part of the campaign finance law, the Supreme Court has made it easier for certain non-profit organizations to express support for, or opposition to, political candidates.

BODY:

The U.S. Supreme Court's decision last Dec. 15 in Federal Election Commission v. Massachusetts Citizens for Life Inc. n1 presents both new opportunities and significant dangers for corporations and unions that seek to increase their political activities.

n1 107 S. Ct. 616 (Dec. 15, 1986), aff'g 769 F.2d 13 (1st Cir. 1985) (hereinafter MCFL).

In a 5-4 decision, the Court ruled that the statutory prohibition against corporate political activity, set out in 2 U.S.C. @ 441b, is unconstitutional as applied to the independent political expenditures of MCFL, a non-profit anti-abortion organization.

While this holding only applies to certain kinds of non-profit corporations, another aspect of the Court's decision applies to all corporations and unions. The court construed @ 441b, which prohibits corporate and union contributions and expenditures in connection with federal elections, to forbid only those independent political disbursements that expressly advocate the election or defeat of a candidate.

The expenditures at issue involved the publication and distribution by Massachusetts Citizens for Life (MCFL) of a September 1978 special election edition of its newsletter. The election edition encouraged readers to "Vote Pro-Life" and identified candidates that it deemed pro-life and those it did not. At a cost of $ 9,812.76, MCFL published and mailed the election edition to 5,986 individuals who had contributed money to the organization and to 50,674 members of the general public.

In the first part of his opinion, Associate Justice William Brennan, speaking for a unanimous Court, ruled that MCFL had indeed financed a political expenditure prohibited by @ 441b. MCFL had contended that the language of the statute only reached direct contributions to a candidate or expenditures coordinated with a candidate, not disbursements made independently of the candidate. n2

n2 Brief for Appellee at 10-12.

Yet the Court held, on the basis of the legislative history of the statute, that @ 441b prohibits independent expenditures by corporations and unions as well as direct contributions and coordinated expenditures.

The Court did agree with MCFL that @ 441b had to be narrowly construed to prohibit only those independent political disbursements that expressly advocated the election or defeat of a particular candidate. On the facts presented, however, the Court ruled that the MCFL election edition did constitute express advocacy because it told its readers to vote for "pro-life" candidates and then identified which candidates held the desired position.

The Court further held that the election edition did not fit within the

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exception for publications by members of the press. The justices pointed out that the election publication was written by a person who did not prepare regular editions of the MCFL newsletter; that it was distributed to an audience 20 times the size of the regular readership; and that it did not contain the newsletter's masthead or volume and issue numbers.

Burden on Free Speech

Having determined that the statute had been violated, a plurality of the Court, consisting of Associate Justices Brennan, Thurgood Marshall, Lewis Powell Jr., and Antonin Scalia, stated that @ 441b imposed a substantial burden on the group's First Amendment rights.

The Court was concerned that the statutory requirement that a corporation employ a political action committee (PAC) to make independent expenditures dictated a more formal organization, involved substantial administrative costs for recordkeeping and reporting, and would vastly reduce the amount of funds available for the political activities of such non-membership corporations as MCFL. Under the Campaign Act, a non-profit corporation may solicit contributions for its PAC only from its members, and to be a "member," a person must pay periodic dues to the parent corporation and have the right to participate in the governance of the corporation. n3

n3 2 U.S.C. @ 441b(b)(4)(C). See also Advisory Opinion 1984-22 (June 18, 1984), Fed. Election Camp. Fin. Guide (CCH) paragraph 5767.

Associate Justice Sandra Day O'Connor, while joining the remainder of Justice Brennan's opinion, indicated that the plurality might be undermining the disclosure requirements the Court upheld in 1976 in Buckley v. Valeo n4 and stated her view that the burden of @ 441b on MCFL stemmed only from a decrease in funds available for political speech and the requirement of a more formal organization.

n4 424 U.S. 1, 60-84 (1976) (per curiam).

The five-person majority decisively held that the governmental interests underlying @ 441b — the prevention of political corruption and the protection of the First Amendment rights of dissenting members -- did not justify the statute's ban on MCFL's support of or opposition to candidates.

In rejecting the corruption rationale, the Court departed from the reasoning it used in earlier cases to strike down limitations on independent expenditures by individuals and political committees -- namely that the uncoordinated nature of these expenditures undermined their value to a candidate and they were therefore unlikely to result in political debts owed by a candidate. n5

n5 See Federal Election Comm'n v. National Conservative Political Action Comm., 105 S. Ct. 1459, 1469 (1985); Buckley, 424 U.S. at 45-47.

Instead, the Court defined corruption as the acquisition of influence in the political marketplace by entities using resources that were obtained in the economic arena and that, therefore, did not reflect popular support for any particular set of beliefs.

Since MCFL was organized to advance a political agenda and its resources only reflected its popularity in the political marketplace, the Court held that the group's independent expenditures did not constitute the "unfair deployment of wealth" and did not raise the specter of corruption. n6

n6 MCFL, 107 S. Ct. at 628.

The Court dismissed the contention that @ 441b was necessary to protect contributors who supported MCFL's position on abortion but who opposed its electoral endorsements, noting that a narrower remedy would simply be to disclose to contributors that their funds might be used to finance independent expenditures.

Some Broader Implications

The Court's opinion sent a clear signal that the Campaign Act is

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constitutional as applied to political activities by ordinary corporations and unions. In earlier rulings, the Court had affirmed the validity of @ 441b as applied to corporate and union contributions and to expenditures coordinated with candidates. n7 Although the Court left the issue open, the majority's reasoning in MCFL clearly suggests that @ 441b is valid as applied to the independent expenditures of business corporations and labor unions, since these entities would otherwise employ resources obtained in the economic sphere to advance their political beliefs.

n7 See National Conservative Political Action Committee, 105 S. Ct. at 1468; Federal Election Comm'n v. National Right to Work Comm., 459 U.S. 197 (1982).

In analyzing the statutory prohibition in terms of its effects on non-profit organizations, rather than lumping all types of corporations together, the Court took a significant step forward. In its 1982 decision on a related issue in FEC v. National Right to Work Committee, by contrast, the Court had declined to distinguish ideological corporations from business firms; instead, it deferred to the congressional determination that regulation of all corporate contributions was necessary. n8

n8 National Right to Work Comm., 459 U.S. at 210.

Chief Justice William Rehnquist, in his dissent in MCFL, contended that similar deference was appropriate in this case and that the majority was engaged in legislative line-drawing. The Court, however, has often reviewed the validity of a restriction under the First Amendment by analyzing its effect on the parties before it, rather than by upholding the restriction because it is valid in most other situations.

In Buckley v. Valeo, for example, the Court established an exemption to election law disclosure requirements for minor parties subject to governmental or private harassment. n9 A few years later, it applied this exemption to protect one such political party in Brown v. Socialist Workers '74 Campaign Committee. n10

n9 Buckley, 424 U.S. 15 68-74.

n10 459 U.S. 87 (1982).

By analogy, the Court has exempted a number of civil rights groups and unions from statutes prohibiting the unauthorized practice of law or the improper solicitation of legal business, n11 noting in one case that "broad prophylactic rules in the area of free expression are suspect." n12 It appears, therefore, that the majority in MCFL was simply doing justice to the defendant before it, not engaging in legislative linedrawing.

n11 In re Primus, 436 U.S. 412 (1978); United Transp. Union v. Michigan Bar, 401 U.S. 576 (1971); United Mine Workers v. Illinois Bar Ass'n, 3898 U.S. 217 (1967); Brotherhood of R.R. Trainmen v. Virginia Bar, 377 U.S. 1 (1964); NAACP v. Button, 371 U.S. 415 (1963).

n12 Button, 371 U.S. 438.

The majority's rationale in rejecting the state interests offered in justification by the government is nonetheless potentially troublesome. The Court acknowledged "the legitimacy of Congress' concern that organizations that amass great wealth in the economic marketplace not gain unfair advantage in the political marketplace." n13 This proposition, however, is contrary to the Court's traditional view that a legislature may not limit speech in order to protect what it perceives to be the proper functioning of the marketplace of ideas.

n13 MCFL, 107 S. Ct. 15 631.

Notably, in First National Bank of Boston v. Bellotti, n14 the Court struck down a state statute banning corporate speech on referendum issues even though the corporate funds to be used in referenda were obtained through banking and business transactions. The majority in Bellotti, dismissing the contention that

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business funds might overwhelm the decision-making ability of Massachusetts citizens, stated that "if there be any danger that the people cannot evaluate the information and arguments advanced by appellants, it is a danger contemplated by the framers of the First Amendment." n15

n14 435 U.S. 765 (1978).

n15 Id. at 792.

Similarly, in other decisions, the Court has struck down a statute that prohibited election-day editorial endorsements by newspapers, n16 a statute requiring newspapers to give free space to candidates who had been criticized by the papers, n17 an administrative order mandating that a utility include in its billing envelopes the publications of a pro-consumer group in addition to its own newsletter, n18 and a statute construed to prohibit a candidate from promising to serve at a lower salary than that allowed by law. n19

n16 Mills v. Alabama, 384 U.S. 214 (1966).

n17 Miami Herald Publishing Co. v. Tornillo, 418 U.S. 241 (1974).

n18 Pacific Gas & Elec. Co. v. Public Util. Comm'n., 106 S. Ct. 903 (1986).

n19 Brown v. Hartlage, 456 U.S. 45 (1982).

In the latter case, the Court pointed out that "the State's fear that voters might make an ill-advised choice does not provide the State with a compelling justification for limiting speech." n20

n20 Id. at 60.

Only in the electronic media has the Court, citing the scarcity of transmission frequencies, approved legislative regulation of access, reaffirming that individuals and candidates must be given free time to respond, respectively, to personal attacks and editorial endorsements of opponents n21 and that candidates must be permitted to buy reasonable amounts of air time to further their campaigns. n22

n21 Red Lion Broadcasting Co. v. FCC, 395 U.S. 367 (1969).

n22 CBS Inc. v. FCC, 453 U.S. 367 (1981).

How Is This Case Different?

The Court's rationale in MCFL -- based on its stated concern over the use in politics of funds amassed in business -- may thus have been primarily intended as a way of distinguishing between the independent expenditures of non-profit organizations and those of business firms and unions. Had the Court employed its usual reasoning that focuses on whether political debts are created, the path would have been largely cleared for business corporations and unions to engage in independent expenditures, since these do not result in political debts.

Consequently, the Court's conclusion that in this case Congress may regulate access to the political marketplace may constitute a one-time departure from its traditional view that citizens can distinguish between good ideas and bad without the need for legislative oversight.

In order to make the distinction between non-profit groups and other organizations, the Court had to spell out, of course, the characteristics a corporation must possess before it may use treasury funds for independent expenditures. The last part of the Court's opinion sets forth three such characteristics.

First, the corporation must be formed for the express purpose of promoting political ideas and cannot engage in business activities. Political fund-raising events are not a business activity if they are "expressly denominated as requests for contributions that will be used for political purposes, including direct expenditures." n23

n23 MCFL, 107 S. Ct. at 631.

Although MCFL, for example, limited its fund-raising events to bake sales, dances, picnics, and the like, a non-profit corporation presumably could engage

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in more systematic activities, such as direct sales to individuals of items reflecting an organization's theme -- for example, wildlife books from a conservation organization. If funds are raised using such corporate intermediaries as a chain of bookstores, however, a problem with @ 441b would arise.

Second, the non-profit corporation must not have been established by a business corporation or a labor union and must not accept contributions from these entities, and third, the non-profit corporation must not have shareholders or other persons that possess a claim on its assets or earnings.

In sum, the decision in MCFL allows independent expenditures only by nonprofit ideological corporations that do not accept funds, directly or indirectly, from business corporations or labor unions.

A non-profit corporation that seeks to use its treasury funds to finance independent expenditures will be subject to the Campaign Act's disclosure requirements, a point noted by the Court in rejecting the contention that business and labor might secretly funnel money to non-profit groups for candidate advocacy. Any entity or individual that makes independent expenditures in excess of $ 250 in a calendar year must report the identities of all contributors who annually provide more than $ 200 in funds intended to further these independent expenditures and all recipients who annually receive political disbursements of more than $ 200. n24

n24 2 U.S.C. @ 434(c).

In addition, independent expenditures, or solicitations for contributions, made through general public political advertising must clearly state the name of the non-profit corporation that paid for the communication and that the communication was not authorized by a candidate or a candidate's committee. n25

n25 2 U.S.C. @ 441d.

Should the independent political disbursements of an organization become so extensive that its major purpose may be regarded as campaign activity, the Campaign Act would categorize the organization as a political committee, triggering a host of other reporting, record-keeping, and organizational obligations. n26

n26 See MCFL, 107 S. Ct. 15 630.

Further, the Federal Election Campaign Act imposes limits on the political contributions of an individual, including an aggregate limit of $ 25,000 on total federal political contributions in a calendar year and an annual limit of $ 5,000 on contributions to a single political action committee. n27 The plain language of the statute would suggest that an individual may give more than $ 5,000 in political contributions to a non-profit corporation, as long as the corporation is not a political committee, but may not exceed the $ 25,000 annual limit on total political contributions.

n27 2 U.S.C. @@ 441a(a)(1)(C), 441a(a)(3). For purposes of the $ 25,000 limit, a contribution given to a candidate in a non-election year is deemed made in the subsequent election year. See 2 U.S.C. @ 441a(a)(3).

The constitutionality of these limits as applied to contributions to independent expenditure groups has yet to be resolved by the Supreme Court, although in Buckley v. Valeo the Court did uphold the $ 25,000 limit in the context of contributions to candidate committees. n28 Associate Justice Harry Blackmun, in a 1981 concurring opinion, explicitly questioned the constitutionality of the $ 5,000 limit as applied to contributions to independent expenditure committees. n29

n28 Buckley, 424 U.S. at 38. See also Mott v. Federal Election Comm'n, 494 F. Supp. 131 (D.D.C. 1980) (holding the $ 5,000 and $ 25,000 limits constitutional as applied to contributions made to independent expenditure committees).

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n29 California Medical Ass'n v. Federal Election Comm'n, 453 U.S. 182, 203-204 (1981) (Blackmun, J., concurring).

The Internal Revenue Code imposes its own series of restrictions on the partisan political expenditures of non-profit corporations. A corporation organized under I.R.C. @ 501(c)(3) is flatly prohibited from making partisan political expenditures. A corporation organized under I.R.C. @ 501(c)(4) may engage in candidate advocacy but must primarily involve itself in the promotion of social welfare rather than political campaigning. n30

n30 See Rev. Rul. 81-95, 1981-1 C.B. 332.

The Internal Revenue Code imposes a penalty tax on the independent expenditures of a @ 501(c) corporation unless these expenditures are made from a segregated account consisting of political contributions, not a general treasury account. Currently, I.R.C. @ 527(f) sets this penalty tax at a rate of 46 percent on the lesser of a @ 501(c) organization's partisan expenditures or investment income. n31

n31 Treas. Reg. @ 1.527-6(e)(3). The interest income on the segregated account will be taxed pursuant to I.R.C. @ 527(b) and a separate return (Form 1120-POL) must be filed annually.

'Express Advocacy' Standard

For most corporations and labor unions, the Court's most important ruling in MCFL is probably its holding that @ 441b only prohibits those independent political disbursements that expressly advocate the election or defeat of a candidate. The express advocacy standard was first adopted by the Court in Buckley v. Valeo to establish a constitutionally distinct line between protected issue discussions and reportable candidate advocacy. n32

n32 Buckley, 424 U.S. at 74-82.

As a consequence of the Court's statutory interpretation, corporations and unions will be allowed under the Campaign Act to engage in issue advocacy around election time -- as long as the political disbursements are made independently of any candidate or political party and do not expressly advocate the election or defeat of a candidate.

Thus, for example, a business firm could take out advertisements supporting free trade despite the fact that a federal candidate has taken a protectionist electoral stance.

It should be clear that corporations and unions may well be able to use the "issue advocacy" doctrine to inject substantial funds into the electoral process. As the Supreme Court stated in Buckley v. Valeo, persons and groups would not have much difficulty "devising expenditures that skirted the restriction on express advocacy of election or defeat but nonetheless benefitted the candidate's campaign." n33

n33 Id. at 45.

In MCFL, the Court could have simply assumed the express advocacy standard applied and need not have decided this issue, the course taken by the 1st Circuit in the case. This would have been especially appropriate since the question had not been squarely presented.

Notably, the Federal Election Commission defines express advocacy as a "communication containing a message advocating election or defeat," n34 a standard that encompasses implicit candidate advocacy and is broader in scope than the Supreme Court's delineation of "express words of advocacy of election or defeat." n35

n34 11 C.F.R. @ 109.1(b)(2).

n35 Buckley, 424 U.S. at 44 n.52.

In an en banc decision, the 2nd Circuit has, however, rejected the commission's construction and held that the words "expressly advocating" mean exactly what they say. n36 On Jan. 9, 1987, a 9th Circuit panel ruled, however,

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that the effect of a communication, its message taken as a whole, and its context were relevant factors in determining the absence or presence of express advocacy. n37

n36 Federal Election Comm'n v. Central Long Island Tax Reform Immediately Comm., 616 F.2d 45, 53 (2d Cir. 1980) (en banc) (per curiam). See also Federal Election Comm'n v. AFSCME, 471 F. Supp. 315 (D.D.C. 1979) (holding that a poster satirizing then-President Ford's pardon of Richard Nixon does not constitute express advocacy).

n37 Federal Election Comm'n v. Furgatch, No. 85-5524, slip op. at 12-15 (9th Cir. Jan. 9, 1987). The author of this article participated in the briefing of this case on behalf of defendant.

The court held that a newspaper advertisement telling readers not to let then-President Carter engage in unethical campaign practices constituted express advocacy because the advertisement was published during the week preceding the election; because it contained references to President Carter's campaign; and, according to the court, because the only option available to a reader who agreed with the ad was to vote against President Carter. n38

n38 Id. at 16-18.

In trying to sort out whether a particular communication contains express candidate advocacy, a corporation or union may wish to request an advisory opinion from the Federal Election Commission.

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November 15, 1990, Thursday

LENGTH: 409 words
BYLINE: By States News Service
DATELINE: WASHINGTON
KEYWORD: Complaint
BODY:

Political watchdog group Common Cause has filed a complaint with the Federal Election Commission against seven prominent business executives who reportedly exceeded campaign contribution limits in 1988.

The complaint, filed Nov. 1, charges the seven with violating the Federal Election Campaign Act, which forbids individuals from giving aggregate amounts of more than $ 25,000 to political candidates in a calendar year.

The Common Cause list includes Ira Riklis, son of Riveria Hotel owner Meshulam Riklis, who Common Cause alleges gave $4,500 more to candidates than allowed by law.

Common Cause officials said Wednesday the complaint was lodged based on an April 18 article in the Los Angeles Times that quoted unnamed congressional sources who said contributions from corporate raiders have resulted in blocking bills restricting leveraged buyouts and hostile takeovers.

"There is no reason why the Commission cannot and should not have an effective procedure by which such records are regularly monitored for violations of the aggregate limit," Common Cause representatives said in a prepared statement.

The Times story said Meshulam Riklis, 77, exceeded the $ 25,000 ceiling by $1,000 in 1988. His lawyer was quoted as saying Riklis thought he could credit a $1,000 donation to Delaware Sen. Joseph Biden's 1988 presidential run to 1987, when Biden dropped out of the effort.

Biden, chairman of the Senate Judiciary Committee, was described in the Times as the "favorite candidate" of the Riklis family, receiving $12,000 from the Riklises during the last four years.

Others named in the Common Cause complaint are: corporate buyout experts Harold Simmons, who gave candidates $59,958 in 1988; Henry Kravis, who contributed $56,711; Raymond Kravis, who gave $34,500; and Ronald O. Perelman, who contributed $30,500, according to Common Cause and the Los Angeles Times.

Dwayne Andreas, chairman of Archer Daniels Midland, exceeded the $ 25,000 limit by $3,680, and his wife, Dorothy Inez Andreas, exceeded the amount by $2,680, according to Common Cause and the Times.

Anyone named in an FEC complaint must receive a copy of the complaint in five days, and then has 15 days to respond. The FEC could negotiate civil fines of as much as $10,000 for willful violations of election laws.

The commission has the authority to refer violations to the Justice Department for criminal prosecution, where fines could go as high as $ 25,000.

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September 1, 1984
SECTION: POLITICS; Campaign Report 1984; Vol. 16, No. 35; Pg. 1618
LENGTH: 4498 words
HEADLINE: Republicans and Democrats Battling To Raise Big Bucks for Voter Drives
BYLINE: BY MAXWELL GLEN
DATELINE: WINSTON SALEM, N.C.
HIGHLIGHT:
The national parties are coordinating the fund raising by state and local parties, which has already triggered charges that efforts violate election finance laws.
BODY:

Caroline Loggins is a platoon leader in a war that will determine the next President. And, like most commanders in the field, she's relying on local resources more than promises from supreme head quarters.

Loggins manages the 5th Congressional District office of the North Carolina Democratic Party's "Unity Campaign," a statewide effort to register voters and get them to the polls on Nov. 6. From its headquarters in Raleigh, the state party is coordinating local registration and voter drives in the hope of improving upon the Democrats' showing in the 1980 presidential election, when Ronald Reagan carried this heavily Democratic state by 41,383 votes.

Reagan won this traditionally closely contested district by only 14,692 votes in 1980. This year, with a woman on the Democratic presidential ticket and a hotly fought Senate race between Gov. James B. Hunt Jr. and the Republican incumbent, Jesse A. Helms, Loggins is counting on Democrats to turn out in greater numbers.

Loggins knows that her efforts and those of other party organizers in 22 selected precincts could mean the difference in a battle over a few percentage points. But there's only a short time in which to do it all. Under state law, voter registration ends on Oct. 8. Less than a month will remain after that for rallying likely Democratic voters, new and old, and getting them to the polls.

What's more, signing up and gathering the troops may require more money than the Democrats can raise. North Carolina law limits individual contributions to $4,000 per political committee and prohibits direct assistance to candidates from corporate and union treasuries; federal campaign finance law, which also prohibits direct corporate and union support, requires further that any purchases made on behalf of federal candidates be paid from contributions that meet federal standards. And where resources are available, there are always numerous candidates and causes seeking their share.

The Democrats nationally are attempting to offset Republican wealth and experience in perhaps the most electorally important battle of the 1984 campaign: the effort by both of the parties to raise and spend money for voter registration and to get out the vote.

As the presidential nominees this year, Reagan and Democrat Walter F. Mondale are each eligible to receive $40.4 million in public funds and up to $6.9 million from their parties. Federal law prohibits additional expenditures on behalf of the nominees in all but a few instances. One of those is spending for or against a candidate without his or her help or express approval.

Another involves expenditures by state and local parties for, among other things, bumper stickers, pins and other campaign-oriented paraphernalia; volunteer phone banks; and door-to-door canvassing. Federal law permits unlimited expenditures of this sort when conducted primarily on behalf of the presidential and vice presidential nominees; that exemption from contribution limits extends only to purchases of campaign materials for House and Senate

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candidates.

Meanwhile, the states have jurisdiction over grass-roots activities that do not explicitly or implicitly promote or involve federal candidates. Many states, in fact, permit the use of funds that would be illegal if spent on behalf of federal candidates. In some states, for example, corporations and unions may underwrite part or all of the expense of grass-roots activities -- with funds drawn directly from their treasuries; individual donors, who are limited to $ 25,000 in contributions that would fall under Federal Election Commission (FEC) rules per year, may often contribute as much as they wish for nonfederal purposes.

Because voter drives for one or more of a party's candidates tend to help the rest, both Republicans and Democrats have turned their relatively unrestricted state and local groups into conduits for "soft money" -- contributions that would be illegal under federal campaign finance law.

The Republicans, who according to one estimate funneled as much as $15 million in 1980 into grass-roots activities for Reagan, are expected to match and probably surpass that total this year. The Republican National Committee (RNC) has established a new program, The Victory '84 Alliance, to coordinate fundraising efforts with state and local parties; additionally, the GOP is trying to channel money to nominally nonpartisan, conservative groups that are engaging in voter registration and get-out-the-vote campaigns.

After a relatively underfinanced grassroots effort in 1980, the Democrats have pledged to raise and distribute $15.2 million to state and local parties this year. Mondale's chief fund raiser, Tim Finchem, has assumed the reins of a new Democratic Party affiliate, the Democratic Victory Fund, that will coordinate that effort as well as raise the $6.9 million the party is allowed to spend on the presidential election.

In 1980, the Democrats raised only $4.1 million of the $4.6 million the party was permitted to spend that year. Some skeptics wonder whether that augurs poorly for this year's efforts, especially because the party is starting the fund-raising effort so late in the campaign.

Moreover, some states, such as North Carolina, forbid corporate and union contributions and limit individual donations. Consequently, any national effort to maximize potential financial support for grass-roots activities is an enormous legal and accounting challenge.

Officials of both parties insist that their expenditures on voter registration and get-out-the-vote drives will comply with federal and state guidelines.

But some critics aren't so sure. The varying estimates of soft spending in past years indicate the difficulty of accounting for all of it, they contend. State disclosure laws and the enforcement record of state election boards vary. Critics of the soft money allowances contend that a sophisticated party organization can spend millions of dollars on a coordinated grass-roots campaign without reporting a penny of it.

Such coordination, some former FEC officials admit, may not have been what the commission had in mind when, in the late 1970s, it decided to encourage "party building" expenditures. On Aug. 28, the Center for Responsive Politics, a Washington-based nonprofit group, filed a complaint challenging the legality of party building expenses with the FEC. Common Cause president Fred Wertheimer says his group plans to register a complaint or request an FEC rule making soon on soft money expenditures. As the campaign heats up, more such actions may follow.

MAZE OF RULES

This year's effort by both parties suggests a more sophisticated understanding than ever of the rules and opinions regarding state and local

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party expenditures.

Election law specialists cite a 1978 FEC advisory opinion (AOR 78-10) as the legal basis for dividing grass-roots activities into federal and nonfederal accounts. The advisory opinion, which has since been written into FEC regulations, came in response to a request from the Republican State Committee of Kansas.

Then-FEC chairman Joan D. Aikens wrote that state and local party committees could divide the costs of registration and get-out-the-vote activities between federal and nonfederal categories; costs allocated to federal categories would count toward FEC limitations. (Subsequent rules and opinions have provided the various formulas used to determine the state-federal distribution of costs.)

The advisory opinion ostensibly compelled state and local parties to maintain separate accounts for federal and nonfederal expenditures. Funds deemed permissible for promoting federal candidates were colloquially called "hard money;" those which could be technically spent on behalf of nonfederal candidates were similarly termed "soft money."

At the time of its 1978 opinion, federal law prohibited state parties from spending on behalf of any federal candidates. Voter registration and get-out-the-vote activities fell under these limitations.

In 1979, Congress amended the Federal Election Campaign Act and lifted some of the spending limitations on state parties. They were allowed to spend unlimited funds on voter registration and get-out-the-vote drives as long as those activities were primarily on behalf of a presidential nominee; expenditures by state parties for buttons, placards and other campaign materials for all federal candidates were unlimited. Expenditures for other activities on behalf of House and Senate candidates were limited to two cents a voter.

While the FEC's advisory opinion may have sanctioned the combined use of hard and soft money by state parties for grassroots activities, the 1979 amendments were more important for the national parties, which traditionally had left their state and local affiliates to fend for themselves. Because the state parties could play a larger financing role, federal candidates encouraged their national parties to focus more on lower-level organizations.

The "party building" incentives introduced the parties to a melange of often conflicting state laws. Political contributions from corporate and union treasuries, for example, are permissible in some states and proscribed in others; and some of the most restrictive states have a sizable share of electoral votes.

According to a compilation by the FEC, corporate and union contributions are unlimited in 18 states, which control 195 electoral votes: California, Colorado, Georgia, Idaho, Illinois, Louisiana, Missouri, Nebraska, Nevada, New Jersey, New Mexico, North Dakota, Oregon, Rhode Island, South Carolina, Utah, Virginia and Washington. Eleven more states with 123 electoral votes -- Iowa, Kentucky, Massachusetts, Michigan, Minnesota, Montana, Ohio, Oklahoma, Tennessee, West Virginia and Wisconsin -- permit limited or unlimited political gifts from union dues but prohibit corporate contributions; no state permits unlimited or limited corporate contributions while prohibiting union donations.

In 12 states, controlling 116 electoral votes, both corporations and unions may make limited contributions: Alaska, Arkansas, Delaware, Florida, Hawaii, Indiana, Kansas, Maine, Maryland, Mississippi, New York and Vermont. Alabama (9 electoral votes), which sanctions unlimited gifts from union treasuries, limits but does not forbid corporate contributions.

Seven states and the District of Columbia, in addition to North Carolina, prohibit all direct corporate or union gifts. The others are Arizona, Connecticut, New Hampshire, Pennsylvania, South Dakota, Texas and Wyoming. Combined, these states have 95 electoral votes.

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Individual donors and political action committees (PACs) enjoy uniformly freer rein. Individual gifts are unlimited in 27 states, accounting for 326 electoral votes and limited in varying degrees in the others. According to the FEC, PAC contributions are unlimited in 30 states controlling 339 electoral votes and subject to various limits elsewhere.

All this makes for a political strategist's as well as an accountant's nightmare. Some key states from the strategist's view -- Pennsylvania and Texas, for example -- prohibit some contributions that less important states, such as Rhode Island, do not.

Yet there is a bright side. Individuals, PACs, corporations and unions that are restricted in one state can, in most cases, extend their generosity to another. Only four states -- Michigan, Nebraska, North Carolina and Oregon -- regulate the receipt of out-of-state contributions. None, according to the FEC, forbids it.

House Democrats, who led the effort to approve the 1979 amendments, believed that the new party-building incentives would help their party more than the GOP.

In 1980, however, Republicans proved far more prepared to exploit the new rules. In her book, Politics and Money (MacMillan, 1983), Elizabeth Drew quoted GOP officials admitting as much. "We picked out the states that needed the money, identified money from major contributors and funneled it into the states," Robert Perkins, a soft money campaign fund raiser in 1980, told Drew. "This was outside the federal limits; there were no federal limits on these contributions." Perkins is now finance director of the National Republican Senatorial Committee.

Estimates of the 1980 soft money drives vary. Drew attributed to Perkins a $9 million estimate for the GOP grass-roots effort on behalf of the Reagan-Bush ticket. In his book, Financing the 1980 Election, (Lexington Books, 1983) political scientist Herbert E. Alexander writes that state and local party committees added another $6 million to the GOP grass-roots operation, bringing the total to about $15 million. Although Drew offered no estimate of state and local party expenditures on behalf of the Carter-Mondale ticket, Alexander said they were in the $4 million range.

None of this money could be spent on behalf of federal candidates, including the presidential nominees. Instead, the soft money helped free up hard money for use solely on behalf of federal candidates.

REPUBLICAN REPRISE

Among the Republican fund raisers who played a big role in the GOP's soft money drive were Tennessean Ted Welch, Senate Majority Leader Howard H. Baker Jr.'s chief fund raiser; Robert Mosbacher, a Texas oilman and a leading money raiser for Vice President George Bush in 1980; and Reagan kitchen cabinet member Holmes Tuttle.

This year, the GOP is counting on these fund raisers and others to raise millions more for voter registration and get-out-the-vote drives by state and local parties. It is also channeling money to a nonprofit foundation, Americans for a Responsible Government, that is underwriting "nonpartisan" voter registration drives.

Last May, Joe Rodgers, the national finance committee chairman of the Reagan-Bush '84 campaign, left to set up a corporation that would help coordinate both efforts. The new company, Leadership '84, has set for the two programs a budget of $8 million, according to a Rodgers aide. The RNC, which with Rodgers's firm established the Victory Alliance '84, said on Aug. 28 that it plans to spend $19.6 million on state and local activities, of which $2.8 million will come from public funds; Democrats estimate that the GOP will spend from $50 million-$70 million on coordinated state and local party operations.

In an interview, Rodgers said that his company had won commitments from

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volunteers in 45 states to solicit contributions of $5,000 or less for state party federal accounts. Such contributions are limited to individuals and qualified PACs and count against the $ 25,000 annual federal spending limit for individuals.

Many of the program's state chairmen served in the same capacity during the Reagan-Bush primary campaign, which raised 75 per cent of its $16 million in private funds through the mail. Rodgers did not specify how much each state is expected to raise, but initial forecasts would place the goal in the $5 million-$6 million range.

That figure is likely to change as the spending strategy is altered throughout the campaign. The program's North Carolina state chairman, Sally Cone of Greensboro, said that the decision to add a phone bank had increased her quota from approximately $35,000 to "something like $200,000."

Rodgers says that Americans for a Responsible Government's 130 volunteer fund raisers have met half of a $2 million goal; because the group is a nonprofit, nonpartisan foundation, it may receive unlimited contributions from individuals and corporations and need not file reports with the FEC. Among the volunteer collectors is Tuttle, who Rodgers said mailed a personal solicitation to approximately 100 friends.

Half of every dollar raised for the group is destined for an El Cajon (Calif.)-based organization, the American Coalition for Traditional Values. Organized by evangelist Tim LaHaye and other conservative Christian leaders, the coalition has launched a voter drive aimed at the members of 110,000 U.S. churches. More than 200 representatives of the group met with President Reagan at the White House last July.

Among the other likely beneficiaries are the American Defense Foundation, which Rodgers said has established a program to register military personnel and antigun control and anti-abortion groups. In all, Rodgers said, "I know of 15 programs that . . . we'd like to fund."

While most of those programs are likely to focus on potential Reagan supporters, Rodgers insisted that his foundation's intentions are pure. "We have Democrats at every meeting, he said. "We try very hard to be nonpartisan."

COUNTERATTACK

It's no secret that the Democrats have relied for years on the efforts of nonprofit voter education groups to register sympathetic constituent groups. About a dozen such groups operating in five or more states have qualified for nonprofit status, which enables them to receive corporate as well as large donor support.

Because the Democratic Victory Fund is an arm of the Democratic National Committee (DNC), it cannot provide financial support to these nonprofit groups without jeopardizing their nonpartisan status.

Instead, Finchem said that his group would be targeting state parties and that most of the $15.2 million budgeted for them would be eligible for use on behalf of federal candidates.

Finchem's $27 million program, from which the Democrats expect also to finance the DNC's presidential allowance and other national committee projects, will draw on a variety of sources: small and large individual donors; PACs; and union and corporate treasuries. "Our program will be fairly balanced," he said.

Finchem is counting on contributions of $100 or less to provide at least $9 million, or a third, of the fund-raising goal. Direct mail is expected to provide $4 million of that amount. On an as yet unscheduled evening in October, Finchem hopes to add another $5 million at 20,000 parties held in conjunction with a 30-minute videotape aired on national television.

Last December, a similar effort, America for Mondale, raised $1.4 million at 3,000-4,000 parties.

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Meanwhile, selected women's groups, through either their own mailing lists or events organized by their members, are to raise $3 million in various amounts.

But big givers will determine whether the Democratic Victory Fund is a success or failure. About $10 million is to be raised through major events at which Mondale or Geraldine A. Ferraro or their surrogates will appear; teleconferences are expected to add another $1 million. Corporations, unions and individual givers of $ 25,000 or more will be tapped for equal shares of the remaining $4 million.

About 20-25 labor organizations are to be tapped for assistance, Finchem said. To solicit large individual gifts, he added, he is relying heavily on such past Mondale fund raisers as Maryland builder Nathan Landow, Daytona Beach (Fla.) attorney William Crotty, Chicago developer Thomas B. Rosenberg and New York arbitrageur Robert E. Rubin. Most large gifts will range from $1,000-$20,000. But Landow, who is organizing a major dinner that Mondale is expected to attend, said there was "an interest in bringing in new people who are willing to give $50,000 and up.

Finchem contended that one of the Democrats' objectives is to expand the horizons of its big contributors. "Traditionally, the large donor has been a candidate donor," he said. "Our idea is to transfer some of those candidate donors into party donors." Crotty described his role as similar to that of an investment counselor. "We basically have all these vehicles for people to do what they want to do," he said. By mid-August, Crotty said he had raised $100,000 of a $1.2 million quota for his state; a Dallas event, organized by veteran Democratic fund raiser Jess Hay, recently netted $650,000, said The Sun (Baltimore).

Like corporate and union treasury funds, any contributions made in excess of an individual's $ 25,000 yearly federal limit will be ineligible for use in the DNC's presidential and state parties' federal accounts.

Yet Finchem expects most of the money he raises can be used for voter registration and get-out-the-vote efforts on be half of federal candidates. "Most of it will be federal dollars," he said. Indeed, he added, "We'll probably raise more federal dollars than we spend on federal-related purposes."

The next few weeks will determine the accuracy of the Democratic Victory Fund's projections. "It's a matter of motivating the Mondale donor base," Finchem said. "It's also a matter of motivating the states where there is a program.

But the party's unprecedented effort to coordinate its fund raising must contend with unfavorable factors.

One is time. Finchem said that about 40 per cent of the $27 million goal will have been raised by October, when most states end voter registration. About $4 million has already been collected through major donors and a written appeal by New York Gov. Mario M. Cuomo, Finchem said. "I'm confident that we'll get $5 million into voter registration in the states." But by late last month, Democratic Party officials were still developing the detailed plan for spending the money that will be an essential sales tool.

Meanwhile, the reliability of key Democratic resources -- labor and big individual donors -- is less certain than that of GOP donors. Financially strapped after a heated primary campaign, labor organizations will be hard-pressed to finance voter drives among their members, let alone Democrats at large. "About 90 per cent of the [Democratic Victory Fund's] labor allotment will probably come from 8 or 10 unions," not the 20-25 solicited, said an AFL-CIO official.

Even some of the likely backers are wary of the legal hazards of a coordinated state-by-state effort. Said Kenneth Melley, director of political affairs at the National Education Association: "You have to be very careful in

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the implementation [of such a program] to make sure that the laws are being complied with."

After an expensive presidential primary campaign, from which almost $11 million in debts is still outstanding, wealthy Democrats may simply require a harder sell than their Republican counterparts, who so far have played a relatively small role in Reagan-Bush committee fund raising. As attorney Carroll Gardner, the Democratic chairman for North Carolina's 5th Congressional District, said, "I'm sympathetic with what [the Democratic Victory Fund] is attempting to do, but are you aware of how many people are trying to raise money?"

FUTURE CHALLENGES

The generosity of Democratic and Republican donors is not an issue for critics of the parties' soft and hard money campaigns. They question whether federal and nonfederal activities can be adequately accounted for and whether either Congress or the FEC ever intended state and local grass-roots activities to be coordinated and financed at the national level. A not unrelated concern is whether a nonprofit voter registration organization with close links to a political party deserves tax-exempt status.

Despite the efforts of both parties to give their grass-roots programs the appearance of legitimacy, the weak nature and enforcement of many states' election laws leaves those appearances open to question. Disclosure requirements vary and bookkeeping standards may not be strictly enforced, an important problem given the mandate to separate federal and nonfederal dollars. "It's all a lot of arithmetic," said Jan Baran, a former FEC official who now chairs the American Bar Association's Committee on Election Laws.

A recent article in Regardie's magazine illustrated the ways in which a political committee, Mondale's defunct Committee for the Future America, may have commingled hard and soft dollars with impunity. "Virtually every expense the PAC incurred, from long-distance telephone service to a UPI machine for election night 1982, could be split in some way -- paid partly with hard money and partly with soft money," wrote the authors, Bill Hogan and Alan Green, after a five-month study of available records. Much of the soft money, Hogan and Green contended, had come from affiliated committees established in states where otherwise illegal contributions were permissible.

Critics of the use of soft and hard money accounts contend that the practice only encourages abuses.

Meanwhile, campaign finance specialists are at odds over whether lawmakers and regulators ever envisioned the sort of cooperation now in effect. Patricia Fiore, a former assistant counsel at the FEC who now works for the Mondale-Ferraro Committee, says that the right of parties to coordinate state and local expenditures is implicit in the record. "The commission never tried to answer that question head on," Fiore said. "But we know from the [FEC's] pronouncements that parties can coordinate within themselves."

However, William C. Oldaker, who was the FEC's general counsel at the time of the commission's 1978 advisory opinion, said, "The commission never forsaw the implications of the [1979 amendments' state and local party] provisions."

Alexander and Wertheimer are similarly certain about Congress's intentions. Wertheimer asserts that lawmakers merely desired to give state and local parties a right already enjoyed by each party's national committee to participate in grass-roots fund raising on behalf of a presidential candidate. Until the 1979 amendments, the law was silent on state and local party involvement.

Contrary to Congress's original intentions, said Wertheimer, the state parties have become "vehicles for the national parties at the local level." He said that Common Cause will probably ask the FEC to "draw the line" on such coordination.

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In its complaint before the FEC, the Center for Responsive Politics contended "there is no readily apparent way for the commission to confirm, absent a time-consuming audit, that the increasing amounts of nonfederal funds being raised by party committees are being confined to nonfederal purposes, and are not being used in connection with a federal election.

The group said that the Republican and Democratic National Committees funneled $67,000 and $20,000 respectively in nonfederal funds to affiliates in Washington during the last 6 weeks of the 1983 campaign. Yet, it charges there was only one statewide race.

"In recognition of the dominant role of the U.S. Senate race played as the only statewide race in the November election, a portion in excess of 75 per cent of such party building activities should have been attributable to the federal election," the group said.

The complaint asks the FEC, among other things, to clarify its guidelines regarding the allocation of federal and non-federal funds and to amend its reporting requirements.

Despite the likely barrage of complaints, the FEC is unlikely to act any time soon. Said Baran: "I don't think it knows how it's going to handle this."

GRAPHIC: Picture 1, Tia Finchem, Mondale's chief fund raiser who has assumed the reins of a new Democratic Party affiliate, the Democratic Victory Fund, says that one of the Democrats' objectives is to expand the horizons of big contributors.; Picture 2, Joe Rodgers, former finance committee chairman of the Reagan-Bush '84 campaign, set up a company that has a goal of raising $6.2 million to coordinate voter registration and get-out-the-vote drives.; Picture 3, The Democratic Victory Fund is counting on such Mondale fund raisers as Maryland builder Nathan Landow to help it raise $15.2 million. Landow says there is "an interest in bringing in new people who are willing to give $50,000 and up."; Picture 4, Common Cause president Fred Wertheimer says the state parties have become "vehicles for the national parties at the local level." He says that Common Cause will probably ask the FEC to "draw the line" on such coordination. Pictures 1 through 4, Richard A. Bloom

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10/16/74 -- **The New York Times**, p. 31
Title: Bill to Reform Campaign Funds Signed by Ford Despite Doubts

Quote: Under the limits on contributions, no individual could contribute more than $25,000 to all Federal candidates and organizations in an election year.

08/09/75 -- **The Washington Post**, p. A1
Title: Campaign Act Loophole is Discovered

Quote: The campaign law already is under challenge in the courts on grounds that its contribution limits of $1,000 to any one candidate for President and $25,000 overall violates the giver's rights of free speech and petition.

12/07/75 -- **The Los Angeles Times**, II; p.5
Title: Central Issue is Reform Financing

Quote: An individual can contribute no more than a total of $25,000 to all federal candidates.

08/19/76 -- **The Washington Post**, p. B1
Title: The Influential Powers of Positive Giving

Quote: Donors may contribute to congressional races at $1,000 per candidate, but may not contribute more than a total of $25,000 in a year.

01/01/78 -- **Common Cause Frontline**, v. 4, n. 1; p.9
Title: Once Again: The Big Money Flows

Quote: While individuals are limited legally to contributing $1,000 per candidate per election, with an overall contribution ceiling of $25,000 to all federal candidates, a qualified PAC may give...

10/07/80 -- **The New York Time**, p. B12
Title: Justices Will Rule on Authority to Revoke Passport

Quote: In a ruling four years ago, the Supreme Court upheld the $1,000 limit on contributions to individual candidates as well as an overall $25,000 contribution limit by individuals.

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06/26/81 -- The Associated Press

Quote: Under the same law, the medical association's individual members are free to donate $5,000 each to a number of political action committees, subject to a $25,000 ceiling on contributions.

11/19/81 -- United Press International

Quote: The annual contribution level an individual could make to all candidates in an election year would be increased from $25,000 to $40,000.

01/18/82 -- United Press International

Quote: He (FEC spokesman, Fred Eiland) noted that individuals can contribute up to $1,000 per election for each candidate and that each person cannot contribute more than a total of $25,000 to candidates during an election year.

04/04/83 -- Heritage Foundation Reports

Title: PACs, The Taxpayer and Campaign Finance Reform

Quote: Under the 1974 law, individuals were limited to contributing no more than $1,000 per candidate per election, with an annual overall aggregate limit of $25,000 for all political contributions.

Individuals could contribute only $1,000 to a candidate per election; $5,000 to a political committee; and $20.000 to the national committee of a political party, so long as the annual aggregate of all political contributions did not exceed $25,000.

Many agree it should be substantially raised. The overall aggregate annual limit of $25,000 makes no sense..

03/16/85 -- National Journal, v.17, n. 11; p. 590

Title: Congress's Appetite for Controversial Campaign Finance Reforms Diminishing

Quote: Not only were contributions to a congressional candidate limited to $1,000 for individuals and $5,000 for PACs (single donors could give no more than $25,000 in all during an election cycle), but candidates also faced severe spending limits.

ARTICLES STATE A $25,000 LIMIT, BUT TIME FRAME IS AMBIGUOUS*

COVERS 01/31/73 - 11/27/90

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ADM

INTER-OFFICE LETTER

TO: Dwayne Andreas

DATE: November 26, 1990

FROM: Teresa A, Moore, Library

Enclosed are the Federal Election Campaign Act articles you requested. The articles in this stack state the $25,000.00 limit as being "per election year", while the remaining articles in this stack are ambiguous about the time frame.

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...in Kansas City

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Strauss Predicts Gains

WASHINGTON, Oct. 15 (UPI) —Robert S. Strauss, Democratic national chairman, predicted today that his party would win "at least four and maybe five" new Senate seats, 28 to 32 House seats and three or more Governorships in the Nov. 5 elections.

The New York Times/Oct. 16, 1974

Bill to Reform Campaign Funds Signed by Ford Despite Doubts

By JOHN HERBERS
Special to The New York Times

WASHINGTON, Oct. 15—President Ford signed with reservations today legislation for the most extensive reform of Federal campaign-financing practices in American history.

In a signing ceremony in the East Room of the White House, Mr. Ford said that although he had doubts about the use of Federal funds to finance campaigns and was concerned that restricting contributions might interfere with First Amendment rights of citizens, "the times demand this legislation."

"There are certain periods in our nation's history when it becomes necessary to face up to certain unpleasant truths," the President said in a written statement accompanying the signing. "We have passed through one of those periods. The unpleasant truth is that big money influence has come to play an unseeming role in our electoral processes."

Members of Congress who had worked for many months on the legislation, representatives of public interest groups who had lobbied for it and the chairmen of the two major parties looked on and applauded as Mr. Ford signed the bill.

Watergate Cited

In formal remarks to the guests, Mr. Ford made it clear that, whatever his reservations, the legislation was a response to public indignation over Watergate and related scandals.

"The American people want this legislation" he said, saying that his mail had been filled with demands for reform.

The new law is designed to limit the political influence of special-interest groups and wealthy individuals. It provides for public financing of Presidential primaries and elections. In addition, it will restrict the amount of money that contributors may give to candidates for President, Vice President and Congress and the amount that these candidates may spend in their campaigns.

"Although I support the aim of this legislation, I still have some reservations about it, especially about the use of Federal funds to finance elections," Mr. Ford said.

The provisions of the new law go into effect the first of next year. Under the public-financing provision, a candidate in a Presidential primary would be limited to an over-all outlay of $10-million in public and private funds plus $2-million for strictly fund-raising activities. In the general election for President, each major party candidate would receive $20-million.

Under the limits on contributions, no individual could contribute more than $25,000 to all Federal candidates and organizations in an election year.

LEFKOWITZ STRESSES HIS AID TO WORKERS

Louis J. Lefkowitz told a trade-union meeting yesterday that since he became State Attorney General 18 years ago, his office had handled 12,000 workmen's compensation cases and had obtained more than $7-million in settlements and back pay.

The Republican-Liberal candidate for re-election, who was on a campaign tour of Long Island, told the meeting of the International Brotherhood of Carpenters and Joiners in Port Jefferson that the $7-million included wages, fringe benefits and compensation for injured workers.

A poll taken for Newsday and the Gannett Newspapers showed yesterday that Mr. Lefkowitz was far ahead of Bronx Borough President Robert Abrams, his Democratic opponent. The poll gave Mr. Lefkowitz 45 per cent against 24 per cent for Mr. Abrams, with 4 per cent for Edward Campbell, the Conservative, and 27 per cent undecided.

During a news conference in Yonkers, Mr. Abrams accused Mr. Lefkowitz of showing a lack of concern for workers injured or killed on the job. He said that if he was elected, he would work vigorously to protect workers from unnecessary hazards to their health and safety.

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SUITS $50-$60-$70
Hand-Tailored
Sport Coats & Blaze
$25-$35-$45 NONE HIGHER
Famous Designer
SLACKS $10-$15-$2
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CLIFTON, N.J.—550 Getty Avenue (Sir... Bldg. Adjoining the Garden State Parkway) 546-9300 (Open Mon. through Fri. Noon to... Sat. 10 AM—7 PM, Closed Sun.)
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Republic National Bank of New Yo... selling to licensed users, is now se... coupon). You may purchase coins ... The minimum mailing order—shipp... is 10 coins. For mailing coins in lot...
Call for today's quotes before order... Out of N.Y. State, call toll-free 800-...
Please mail me the following gold coi... quantities indicated. (For less than 10 c... lots add $5.00 shipping.) Date quoted...
Note: All payments for orders must be po... marked the same day order is placed.
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___ English Old Sovereign†
___ Hungarian 100 Korona*
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Republic Natio...
452 Fifth Avenue (at 40th Street)

New York Times
10/16/74 p. 31

Lisbon Transition Cabinet Sworn In

By Marcus Ferrar
Reuter

LISBON, Aug. 8—A new Portuguese government of radical left-wingers headed by Prime Minister Vasco Goncalves took office today, bitterly contested by a powerful group of moderate officers and the Socialist Party.

The Cabinet consists of officers close to the pro-Communist Gen. Goncalves and of Marxist civilian technocrats who, with one exception, have no formal party ties.

Its narrow political base—representing only about 18 per cent of the votes cast in April's elections for a constituent assembly—raised immediate doubts about how long it could survive in face of rising anti-Communist violence in the north.

It replaces the coalition of soldiers, Communists, Socialists and center-left Popular Democrats that collapsed nearly a month ago when the two moderate parties resigned to protest the country's increasingly radical course. President Francisco da Costa Gomes described the new Cabinet as transitional.

The long battle between radical leftists and moderates within the Armed Forces Movement—the political body of the officers who staged last year's coup—burst into the open today in a welter of threats and accusations.

The supreme military triumvirate—Costa Gomes, Goncalves and Gen. Otelo Saraiva de Carvalho—publicly reprimanded moderate soldiers who last night issued an opposition manifesto declaring that the new government "lacks credibility and is manifestly incapable of governing."

The triumvirate said the document was divisive, only served to prolong the crisis and infringed military ethics and discipline. Commander Jorge Correia Jesuino, the information minister, threatened to punish those responsible either by mobilizing the masses or "by military means."

See PORTUGAL, A13, Col. 1

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CAB, A10, Col. 1

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See PRESIDE...

...how Soviet Grain Setback

The CIA material has been circulated widely in the administration and in Congress, where policy makers are attempting to evaluate it and gauge the possible impact of such a poor crop on American farm exports.

It was not possible to determine yesterday how much credence the CIA analysis gave the new information, from unidentified sources. However, the fact that it was widely disseminated appeared to give it credibility.

On July 24, the Department of Agriculture issued a revised estimate of the Soviet crop, figuring grain production at 185 million tons and import needs at 20 million tons. In 1972, the Soviets produced 168 million tons and placed orders totaling 21.5 million tons from abroad. Some 13.5 million tons came from this country, contributing to a surge in grain prices here.

David M. Schoonover, Soviet crop analyst in the department's economic research service, said yesterday that his agency stuck by the July 24 estimates.

"The information I see does not suggest a major change," he said. Schoonover said the Soviet crop situation

See GRAIN, A6, Col. 1

Campaign Act Loophole Is Discovered

By Jules Witcover
Washington Post Staff Writer

A loophole has been discovered in the federal limit on presidential campaign financing "big enough to drive a President through," in the words of one candidate's campaign manager.

Congress' failure to impose a limit on what anyone campaigning to be a convention delegate may raise and spend to get himself or herself elected could negate the limits imposed on the presidential candidates by the new campaign reform law, a Federal Election Commission spokesman acknowledged yesterday.

If no restriction is imposed, he admitted, a presidential candidate will be able to advise supporters to funnel contributions directly to delegate candidates committed to him, thus shifting much of the cost of local, county and state-level campaigning to these delegate-candidates.

With more than 5,000 delegates to be selected for the Democratic and Republican national conventions in precinct, county and state conventions and primaries, individual campaigns for delegate would offer a means to pour

See LOOPHOLE, A6, Col. 1

Asks Kissinger to Delay Tr...

Israel Seen W...

By Yuval Elizur
Special to The Washington Post

JERUSALEM, Aug. 8—Israel has asked U.S. Secretary of State Henry A. Kissinger not to begin a new round of shuttle diplomacy in the Middle East until the gap between the Israeli and Egyptian negotiating positions is further narrowed, officials said here today.

The Israelis' request was in response to reports that Kissinger has suggested the third week of August, possibly Aug. 20, to begin a new round of personal diplomacy in the region.

Israel asked Kissinger to postpone any new trip until it receives clarifications of the latest Egyptian positions on an interim agreement in the Sinai Peninsula.

Despite the Israeli appeal to Kissinger to postpone his trip, sources here indicated today that the Israeli negotiating team is united in its conviction that the negotiations should be concluded as soon as possible. Prime Minister Yitzhak Rabin, who at one stage believed that Israel might gain by "taking its time" and trying to counter each Egyptian negotiating position one by one, now believes that no more time should be lost.

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dent coming into the state to aid Wyman, facing Democrat John A. Durkin in a rerun of their contested election last November.

"Let's say it very clearly," Thomson said. "There is an excellent chance the two of them (Ford and Reagan) may be campaigning for Republican votes next winter."

The governor said he told Sears to advise Reagan to "hurry up and make his announcement and get going," and he predicted Reagan would do so "in late September or early October."

See REAGAN, A5, Col. 1

RONALD REAGAN
... aide conveyed plans

Washington Post Aug 9, 1975

chases.

However, the ILA war of nerves continued with reports that the organization, in anticipation of boycotts, is trying to track down the vessels that will carry the grain ordered in the last month.

International grain companies signed sales contracts for 9.8 million tons of corn, wheat and barley in July. Most will come from the United States.

These purchases have threatened to embroil the Ford administration in a political controversy over their domestic price impact, just as the Nixon administration's sales to the Soviets did in 1972.

and Conservation Service, which conducts a weekly survey.

Two-thirds of Iowa's 100 counties, many of which had virtually no rain in July, indicated that their crop prospects for the October harvest are fair or poor, while 31 per cent listed the prospects as good. Two per cent said they were excellent.

Two weeks ago 13 per cent of the counties said crop prospects were excellent, 68 per cent said they were good and 19 per cent said they were fair. None reported poor prospects.

In today's report, the rapid deterioration indicated in last week's report continues, with 57 per cent of the counties reporting fair crop prospects

The July 1 estimate for Iowa by the USDA's Crop Reporting Board, which is scheduled to issue another estimate Monday, was 100 bushels per acre. Awtry speculated yesterday the figure may be 20 bushels below that, or a shortfall of about 242 million bushels for Iowa's 12.1 million acres under cultivation.

Iowa usually produces about 18 per cent of the nation's corn and traditionally is the country's leader in corn production.

Other states, especially those east of the Mississippi River, are not in the poor shape parts of Iowa are in, according to Thatcher Johnson, Iowa's deputy secretary of agriculture.

Loophole Discovered in Campaign Act

LOOPHOLE, From A1

countless millions of dollars into the 1976 presidential race.

The commission, charged with overseeing financing of the 1976 campaign, has created a special task force to deal with the dilemma. The commission spokesman yesterday said new legislation may be required to close the loophole.

A flat prohibition against independent fund-raising and spending by individual candidates for delegates would doubtless be challenged as a deprivation of First Amendment rights. The campaign law already is under challenge in the courts on grounds that its contribution limits of $1,000 to any one candidate for President and $25,000 overall violates the giver's rights of free speech and petition.

Also, such a prohibition would place delegate-candidates running uncommitted to any presidential aspirant at a very great disadvantage in competition with pledged delegates financed by a national campaign.

The commission could rule that all money raised and spent for electing delegates must be charged against the limits of the presidential candidate to whom they are pledged. But such a ruling would not touch individuals running uncommitted.

In that event, such uncommitted delegate-candidates could become vehicles for well financed campaigns in particular states against individuals running pledged to a presidential hopeful. For example, a stop-George Wallace effort could be mounted via an unpledged slate, with no lid on how much could be raised and spent.

Awareness of the loophole came in the course of considering requests to the commission for rulings on how the campaign act applies to candidates for delegate from the Michigan Democratic Party and the Republican State Committee of Pennsylvania. Commissioner Thomas Harris has been placed in charge of the examining task force.

Representatives of most of the declared or anticipated candidates for the Democratic presidential nomination met several days ago at the Democratic National Committee to consider the problem.

Later, representatives of both the Democratic and Republican national committees met with the commission.

Robert Keefe, campaign director for Sen. Henry M. Jackson (D-Wash.), who characterizes the loophole as "big enough to drive a President through," said the Jackson campaign has no recommendation, except that the commission make a speedy and clear-cut ruling on the matter.

John Gabusi, campaign director for Rep. Morris K. Udall (D-Ariz.), said the Udall campaign believes Congress intended that all spending be kept within the $10 million limit and the commission should so rule, with some provision for also limiting how much an uncommitted delegate-candidate may raise and spend. To permit unlimited spending by uncommitted delegates "would be a disaster," he said.

Advertisement Advertisement

PUBLIC NOTICE

D. C. PROPOSED SOCIAL SERVICES PLAN UNDER TITLE XX OF THE SOCIAL SECURITY ACT

Joseph P. Yeldell, Director, Department of Human Resources, gives notice that changes have been made in the Department's proposed plan for social services and in the detailed summary of the plan. A description of that plan was published in this newspaper on July 13, 14, 15, 1975.

Copies of the corrected information are available, at no charge, from the DHR Office of Community Relations (629- or the Office of the Associate Director for Planning and State Agency Affairs (737-1708)

The Department will accept public comments on the plan until September 22, 1975. Comments should be addressed to:

Mr. William H. Whitehurst, Jr.
Associate Director for Planning and State Agency Affairs
Department of Human Resources
1350 E Street, N.W., Room 426 (District Bldg.)
Washington, D.C. 20004
Telephone: 737-1703

Public Hearings: D.C. Council Chambers
August 13, 1975
1:00 to 4:00 p.m. and 7:00 to 9:00 p.m.

A brief description of the final plan is to be published in this newspaper on or before October 1, 1975.

Washington Post Aug 9, 1975

Central Issue Is Reform of Financing

BY ROBERT J. SAMUELSON

Remember the Tillman Act? Probably not. The Tillman Act was a tardy reaction to the presidential campaign of 1896—a campaign in which Republican financier and party chieftain Mark Hanna raised more than $3 million (a prodigious sum for the 19th century) to elect William McKinley over William Jennings Bryan. Hanna methodically solicited major businessmen, earning the nickname "the fat fryer" because he sought to "try the fat out of the manufacturers."

In the election's aftermath, campaign financing continually bubbled to the surface as a political issue, and, in 1905, President Theodore Roosevelt—having himself been accused of receiving secret contributions—urged campaign reform. In 1907, Congress passed the Tillman Act, which prohibited corporations or banks from making "money" contributions to candidates.

It didn't work. Among other things, the law didn't prevent "in kind" contribution of services or payments of candidates' bills. And there weren't any reporting requirements. Since then, most subsequent efforts at campaign finance reform have been similarly unsuccessful: loopholes soon surfaced, or the laws simply weren't enforced.

So the issue is back again in the form of the Federal Election Campaign Act of 1974—an outgrowth of Watergate, skyrocketing campaign expenses, and the persistent belief that "big money" corrupts democracy. More than any of its predecessors, the 1974 law attempts to curb and reform campaign spending, but the law is as detailed and controversial that the Supreme Court may well rule part or all of it unconstitutional. A decision could come as early as next week.

The boldest part of the new law—"revolutionary" in the words of one political consultant—is public financing of presidential elections. Each of the two major party candidates is guaranteed $20 million of federal funds. (Actually, the figure may be slightly larger, because the $20 million will be increased by an inflation factor in January.) In addition, all primary candidates are entitled to up to $5 million in public funds. To qualify for these matching funds, a candidate must raise $5,000 in each of 20 states. After reaching that threshold, the candidate is entitled to federal funds equal to all individual contributions of $250 or less (contributions over that don't qualify for matching funds).

There isn't yet any provision for public financing of congressional and Senate races—though reformers are likely to press for coverage if the law survives the Supreme Court test—but the law does set strict spending ceilings and contribution limits for all federal elections. The details are complicated, but basically the law [illegible] Sets $1,000 as the maximum contribution [illegible] for an individual to a candidate for Congress or the Presidency. (In the presidential election, separate contributions of $1,000 each can be given in both the primary elections and the general election.) An individual can contribute no more than a total of $25,000 to all federal candidates.

—Restricts total spending in the presidential election to $20 million for each major party candidate (which would come from the federal treasury). Primary candidates are restricted to $10 million each, of which a maximum of $5 million could be provided in matching funds. Candidates for the House of Representatives have a spending ceiling of $70,000 for both the primary and general elections. The limit for Senate races is a formula: the state's voting age population multiplied times 8 cents in the primary and 12 cents in the general election. For California, permissible spending in the primary would total about $1,120,000 and in the general election $1,735,000. (In addition, candidates for all offices are allowed to spend an additional 20% over the official ceilings for the costs of fund raising.)

Among both supporters and opponents, there's a general agreement that the new law has transformed campaign financing—at least at the presidential level. Typically, most candidates for the Presidency relied heavily on large donations for loans, which might or might not be repaid, depending on how the candidate fared). A victory in an early primary could be quickly translated into a spurt of new contributions.

Richard Kline, finance director for Sen. Henry M. Jackson (D-Washington), says that "in the old days—the last election—a guy won a primary and then went to a few backers and got $50,000 or $100,000 contributions. You could make a few phone calls."

Now, with the $1,000 limit on individual contributions and the 20-state requirement to qualify for matching funds, that approach will no longer work. "The techniques for getting small contributions are being refined to a greater extent than ever before," says Robert Thomson, an attorney for the Democratic Senatorial Campaign Committee. "First there is direct mail. Second, there are concerts, and then there are small political dinners—bean feeds—with admission of $25 to $50 a head."

Compared with small numbers of large contributions, however, the cost of raising funds by small donations can be expensive and time-consuming. Consider the most popular technique, direct mail. The George Wallace campaign (which raises almost all its money by direct mail) has, by all accounts, the most sophisticated and successful operation of that type. The campaign has a list of nearly 250,000 contributors who receive regular solicitations, and the mailing schedule is now being stepped up from once every two months to once every six weeks. With each mailing, the campaign expects to receive an average of $14 from about 13% of the list, according to Richard Viguerie, the private consultant who directs the Wallace mailings.

Getting that list of 250,000 faithful contributors wasn't easy. When Viguerie took over in the summer of 1972, Wallace had 60,000 names. In the next two years, Viguerie's operation made so-called "prospect" mailings to about 10 million persons, using mailing lists, which are rented from various organizations. "Maybe they (the prospects) subscribe to conservative publications like National Review or a magazine like the Saturday Evening Post. We may have used 400 different mailing lists in the last couple of years," he said.

The returns on these prospect mailings have been low—perhaps 1%—and the cost has just about equalled the contributions of $1.7 million.

"It's pretty much a break-even situation," Viguerie said. "The profit is made going back to people a second and third time."

Viguerie thinks that most of the other candidates have started too late to perfect genuinely efficient mail operations. Of the Democratic candidates, only Wallace and Jackson, he believes, may qualify for the full $5 million in matching funds. Both candidates claim to have raised more than $3 million; Jackson's approach, unlike that of Wallace, relies heavily on dinners and "cocktail parties." In Los Angeles, for example, Jackson has been holding dinners or cocktail parties since September, 1974, and has raised nearly $300,000, according to Kline.

The contrast between presidential campaign expenditures as envisioned by the 1974 law and as practice in the recent past is vivid. The $20 million per candidate spending limit—plus the potential $10 million in the primary—represents a sharp reduction in spending. In 1972, former President Nixon and Sen. George McGovern (D-S.D.), together spent nearly $84 million ($55 for the Nixon campaign and the rest for McGovern). That represents an 83% increase over the 1968 total of $58.4 million and a 210% increase over the 1960 figure of $27.1 million. In the same period, the consumer price index increased 41%.

Moreover, the appeals for funds—especially by the Nixon campaign staff—were particularly heavy-handed in the 1972 campaign. The Nixon fund raisers conducted a systematic campaign among wealthy businessmen, resulting in more than 100 contributions exceeding $40,000. These included a $2 million contribution from insurance magnate W. Clement Stone and illegal contributions from nine large firms—American and Braniff airlines, Gulf, Ashland and Phillips Oil, the Northrup Corp., Goodyear Tire and Rubber, Minnesota Mining and Manufacturing and American Shipbuilding Co.

The reform of these practices, however, has spawned dissatisfaction and disquiet. Some reformers believe that the changes have not gone far enough. Common Cause, for example, would like to see public financing applied to Congressional elections, where, in 1974, contributions from special interest groups—such as labor, business, farm and health organizations—continued to increase rapidly. (Under existing law, neither labor unions nor corporations are allowed to use their own funds for contributions. However, they can solicit their members, employes or shareholders and distribute these funds through political action committees. The best known of these is the Committee on Political Education, or COPE, of the AFL-CIO.)

There are many complaints about the law's practical consequences. Thomson, the Democratic senatorial campaign lawyer, worries that the importance assigned to small contributions means that the primary process will favor candidates who tend toward ideological extremes—such as Wallace or McGovern. Slim like this, he reasons, may strike more of an emotional response in their followers and therefore may be better able to generate small contributions through direct mail solicitations. "The vast majority of people just aren't contributors," Thomson said. "Therefore the law may stunt participation toward the ends of the political spectrum."

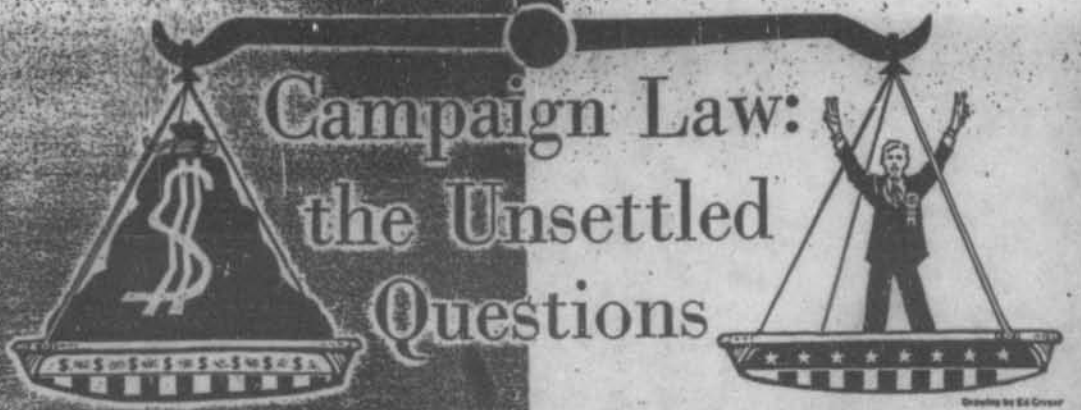
Richard Thaxton, director of political research for the Republican National Committee, sees a giant loophole favoring the Democratic: labor organizations can spend large amounts of money campaigning among their own members for favored candidates, but this spending—which would complement and substitute for a candidate's own activities—doesn't fall under the federal ceiling. Because unions traditionally throw their weight behind Democratic candidates, Thaxton contends that the Republicans are at an automatic spending disadvantage in heavily unionized states. Indeed, he thinks that heavy union canvassing may have made the difference in the recent New Hampshire senatorial contest, where both candidates spent near the limit and the Democrat won.

Should the Supreme Court rule that some—or all—of the 1974 law is unconstitutional, the impact on the campaign would be immediate, although not entirely predictable. Most candidates have counted on receiving matching funds, and if the court rules that out there probably would be a frantic scramble for private contributions. Slim candidates might be forced out of the race entirely. As one observer puts it, "The candidates with access to big money contributors might be all right, but those who expect a grass roots upheaval to thrust them into the White House could be in a lot of trouble."

Passed by Congress in the wake of Watergate, the Federal Election Campaign Act of 1974 is now being challenged as unconstitutional. Its critics charge that the law violates the First and Fifth Amendments.

The Supreme Court is expected to rule within days because of the imminent political campaign and could throw out all or part of the law. Its chief provisions are discussed here, with pros and cons.

Campaign Law: the Unsettled Questions



Drawing by Ed Crosier

LA TIMES 12/7/75 IV PAGE 5

> boost it into a category be- reported $16-million-offer from the Times ... to pay off ... Washington Post Aug 19, 1976 Section B Page 1 Col 6.

Protester

by the uncommitted protesters who are waiting to see which way the wind is blowing."

I noticed a sign next to him it said "$%$&- - - " or words to that effect.

"You've left a blank in the space next to your unprintable epithet," I said.

"Yeah, I have a magic marker in my pocket, and when I decide which guy I really hate the most I'll put his name in."

"What does it hinge on now?"

"Probably on who Ford chooses as his running mate. I'll be honest with you. There isn't a tinker's damn difference between them ideologically. My only concern is who can give Carter the best contest. Protesting is a lot of work, and if the Republicans come up with a weak ticket, I may sit the election out."

"So this could be your last hurrah."

"I would say so. The party is finished. Look at all these idiots standing on the hill screaming every obscenity in the book at the delegates, and the President, and no one even looks around. Even the cops don't give a damn about us any more. When you have a party that doesn't get shocked at Yippies, man, it's all over."

"What would it take for you to commit yourself as a protester to one or the other of the candidates?"

"An affair of Secretary of State or 10 ounces of grass—whichever is worth more."

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The Powers Of Positive Giving

By Donnie Radcliffe

KANSAS CITY—The man in the Palm Beach suit is late. At the velvet rope they demand proof that he belongs. He is annoyed and it shows in the set of his mouth beneath the pencil-thin moustache.

He searches his pockets and for an instant, Positive Mental Attitude (PMA) might not exist. Then his fingers produce the tickets and he rushes ahead, only to encounter yet another barrier. On this day of Presidents and would-be Presidents, security and officiousness are natural companions.

He is W. Clement Stone, a multimillionaire whose largesse to Richard Nixon totaled "well over" $3 million in the 1968 and 1972 presidential campaigns, he says. He is the last of the big spenders to arrive at the $1,000-a-couple United Republican Victory Luncheon in the Raddison-Muehlebach Hotel—and perhaps the last of the big spenders, period. His 1976 candidate has come and gone: the one man he does not want to see win.

See MONEY, B3, Col. 1

Multimillionaire W. Clement Stone, who explains his big campaign donations: "I wanted to change the course of history for the better—and I did."

By Bill Snead—The Washington Post

9304093385 7

THE WASHINGTON POST
Thursday, August 28, 1975

The Influential Powers of Positive Giving

MONEY, From B1

Ronald Reagan—is now inside the ballroom with 750 latter day Republican moneymen.

But Stone, who is nothing if he is not optimistic—after all, he invented PMA—smooths back his thinning jet black hair while impatiently waiting for his wife to catch up. Then, with a smile he jauntily strides ahead into the power-jammed room, where the care and feeding of the moneymen has already begun.

The style of Republican conventions (as well as Democratic) may be changing because of the new federal campaign spending laws. That doesn't mean that affluence coupled with influence is also gone. Millionaires and multi-millionaires may not be as visible as they once were but they are still to be found here.

This week, for example, those leaders of American industry, the traditional backbone of Republicanism, have been scurrying between committee meetings, delegate caucuses, prayer breakfasts and delegation lunches to lend influence and persuasion their still-commanding presences.

Stone, an Illinois delegate, is a member of the Committee on Permanent Organization. Joseph Coors, the Colorado beer baron, is a member of the Committee on Resolutions.

Wealthy Michigan industrialist Max M. Fisher, a close friend of Gerald Ford and once-generous donor to Richard Nixon, is a member of the Michigan delegation.

And Ronald Reagan's "closet cabinet" officers, Justin Dart, of Dart Industries, which includes Tupperware, West Bend household appliances, Thatcher glass and petrochemicals, and Holmes Tuttle of Los Angeles' largest Ford dealership, are California delegates.

In addition, there are bankers; insurance company, lumber and investment tycoons; heads of steel mills and oil companies; presidents of transportation systems and chain stores.

They are an impressive group. And if they cannot donate their money the way they once might have, they still seem important to the party or to the candidates.

(The new campaign spending law limits individual contributions in a presidential campaign to primaries, unless a candidate foregoes the federal contribution to his political party. It limits individual contributions to $1,000 and group gifts to $5,000. Donors may contribute to congressional races at $1,000 per candidate, but may not contribute more than a total of $25,000 in a year.)

W. Clement Stone's convention command post is a few floors below that of President Ford at the luxurious, ultramodern Crown Center. From it, Stone lobbies, cajoles, nudges and massages Republicans of various ideological persuasions.

The way the new campaign spending laws affect him, he says, is that "I have to do more work in getting other persons involved . . . There is nothing in the law that prevents me from getting you to not only vote for the candidate, but to put up the legal limit or whatever you choose. Before, many of us wouldn't take the time."

On the coffee table, spread out in neat piles, are recent copies of one Stone publication, "Success Unlimited," reminders that this man is a modern Horatio Alger figure who rose from poverty on Chicago's South Side to a $400-million fortune. He did it, he says, through what he calls Positive Mental Attitude, i.e., "that with every adversity there's a seed of equivalent or greater benefit."

It was he, Stone says without equivocation, who in 1968 decided that Richard Nixon was "ready." I decided there was no power on earth that would prevent him from making it. And that we could neutralize the power of the unions, and so forth, by raising large funds."

When Maurice Stans was appointed Nixon campaign finance chairman, Stone recalls, "We met and I gave him some principles on how to raise large sums, and in fact started out with a matching fund. In other words, money would not be the reason he (Nixon) would lose."

Stone's objective really was quite simple:

"I wanted to change the course of history for the better—and I did. The same thing now—the reason I'm involved is that I want to stop this trend from the left. If the Democrats get in this time," he continues, "you might as well know that you're going to make a forward leap into socialism."

Over in the equally luxurious if older Alameda Plaza Hotel, the candidate is different but the ambience is the same. Justin Dart's hilltop vantage point of Kansas City is a couple of floors beneath that occupied by Ronald Reagan.

Dart, and the man he calls his "Gold Dust twin"—Holmes Tuttle — have been "partners" in the political fortunes of Ronald Reagan since the beginning. "We worked the same side of the street," says Dart of his and Tuttle's endeavors to, first, put Reagan in the California state house, then in the White House.

What was in it for them, says Dart, was "preserving some kind of quasi-free competitive America for our kids and grandchildren. And that's the ballgame now, that's survival. If you don't think so, just look at the U.K."

Beyond that, the "wonderful thing," says Tuttle, is "we never wanted anything . . . at no time did we ever ask for anything for ourselves. We were concerned about the direction our government was taking."

Dart says it was Tuttle "more than any other man" who persuaded Ronald Reagan to enter politics. And Tuttle takes the credit matter-of-factly, recalling how Reagan almost singlehandedly, through a nationally televised speech, raised "many millions of dollars" to help pay off Barry Goldwater's campaign debts. What surprised everybody, a short while later, was Reagan's "name identification"—"85-90 per cent, that's unheard of," says Tuttle.

Right then and there, Reagan became their man to rebuild the party in California so Tuttle and his wife went up to see Reagan and his wife. "We talked and talked and talked. I said I could raise money through my friends." The larget campaign became the gubernatorial race of 1966.

Justin Dart calls Tuttle and himself Ronald Reagan's "bang board" and what he means is that they listen. "You see, we never wanted anything for ourselves."

If they have given generously, they have not given extravagantly, they say. Neither will go beyond saying that their donations to Reagan or Richard Nixon or other GOP candidates of bygone years was more than in the "substantial middle range."

Dart says he thinks "limiting unlimited contributions is good—I do not think elections should be bought." But if he could name a sum that individuals might give to presidential candidates, he would pick $5,000.

Like other wealthy donors who are feeling outnumbered and disadvantaged, perhaps, for the first time in their long careers as political benefactors, he laments the "advantages" of labor. They have more "latitude" in their gifts.

So Dart and others like him look for other ways to retain their influence, if giving is to be denied them.

"If the government changes the rules," says Stone, "you take the rules as they are and you play by the rules."

By Bill Snead—The Washington Post

California fund-raisers Holmes Tuttle, left, and Justin Dart.

Morty Gunty: The Hard Game of Big-Time Humor Hustling

GUNTY, From B1

only the day before yesterday. "I sang, did impressions of Danny Kaye (his idol), Jerry Lewis and Johnny Ray. When I saw I was getting a better reaction from the jokes than from the singing, I broke into talking."

Then it was from broke to break. Spotted by an agent in 1953 while taking part in a benefit show at Madison Square Garden, he took his act from club to club. As remains the case today, his routines—"I wrote most, but can still remember buying one from Neil Simon in '54"— were based primarily on his own experiences . . . and his family's.

"I have a 14-year-old daughter who lives alone . . . in my house. I haven't seen her since she was 12. It's a phantom with a phone. She bought herself a pair of those 7-inch platform shoes. Last week she fell off them, but her eyelashes broke her fall.

Gunty is not a Gleason, a Berle or a Hope. He is not a Carson or a Hackett, a Green or a Rickles. He is the first to concede that he is more a Red Buttons, a Jan Murray, a Jack Carter —an accomplished pro who sometimes opens for name singers.

"Comedy is a strange occupation," says Gunty, who last week opened for Robert Goulet in Albany and this week is headlining at New York's

you in the warm, relaxed manner that typifies his off-stage personality. "'Go, get it while you can,' I say, but don't expect that you'll have it made if you're lucky enough to be around in 10 or 15 years.

"You gotta be ready for producers who say, 'Him? He's been around 100 years. Let's get somebody new.' A guy like Phil Foster was fortunate because they needed a older-type man for 'Laverne and Shirley' on TV. Danny Thomas is playing a grandfather on 'The Practice.'"

And be prepared for setbacks to go with the glory. Gunty has just missed more than once. "I did a pilot for a television comedy with Carl Reiner in 1958," he recollects somewhat wistfully. "The show was purchased but

hood, no one needs narcotics. We have food pushers instead. They hang out on street corners selling fixes—of chocolate cake."

Along for the ride and doing some of the pedaling as well as the gliding has been the comedian's wife, Marilyn, the good-natured butt of many of his jokes. Their two daughters, ages 17 and 14, have also—and often—been offered up for tender sacrifice to the ears of laugh-craving audiences.

"I've never been married to anyone else," Marilyn explains matter-of-factly. "I do know enough women married to comics who convince me that you have to be a special kind of person. The life certainly isn't routine.

"I heard a psychologist say one day that comedians are actually still chil-

verbal, says everything that is on his mind, and needs a lot of feedback.

"My wife gave up cooking forever . . . she turned the oven into a planter."

Being his wife—however successful Gunty may be — also means being "very, very supportive," and very, very tactful.

"If he tries out a joke or routine and asks what I think," Marilyn says, "it's hard to give an honest opinion if my reaction is negative. In those circumstances, it's almost as if you are treating a child. Before you criticize, you tell it 400 good things it is doing. Then you lay in, 'Well, that wasn't so hot . . .' and you learn to laugh a lot because Morton is a very funny man."

Sheryl Gunty, the couple's older daughter who plans a career as a singer, enjoys her father and the work [illegible] occasionally accompanies

crazy—really be very funny just fooling around."

He also can be somewhat of a small, unintentional burden. "I've known for a fact that guys have gone out with me because of who my father is," Sheryl says. "Some people are friendly with me because they want to get into show business and think he can help them."

In other words, nothing is all good or all bad. Take it as it comes, let it happen, and roll with the inevitable punches and love-pats.

"Look, I'm a realist," Gunty says. "Once a good thing has happened to me, then and only then, do I believe it. Maybe that's a bit cynical, but that's the way I feel. I'm a happy guy. I'm doing the work I want to do, and I've got one major plan in life—to survive.

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The New York Times
October 7, 1980, Tuesday, Late City Final Edition
SECTION: Section B; Page 12, Column 3; National Desk
LENGTH: 843 words
HEADLINE: JUSTICES WILL RULE ON AUTHORITY TO REVOKE PASSPORT
BYLINE: By LINDA GREENHOUSE, Special to the New York Times
DATELINE: WASHINGTON, Oct. 6
BODY:

The Supreme Court today agreed to decide whether the President had the authority to revoke the passport of an American citizen on the ground that the citizen's international travel was a threat to national security.

Opening its 1980-81 term, the Court agreed to hear the Carter Administration's appeal from a ruling that it lacked the legal authority to revoke the passport of Philip Agee, a former intelligence agent who has traveled widely exposing Central Intelligence Agency methods and personnel.

The Department of State revoked Mr. Agee's passport last December, informing him by letter that his activities in several foreign countries ''have caused serious damage to the national security and foreign policy of the United States.''

The department, acting under Presidential authority, cited a Federal regulation under which such a finding can be the basis for revoking a passport. Mr. Agee, who lives in West Germany, brought suit. A month later, the United States District Court for the District of Columbia ordered the passport returned on the ground that Congress had never given the executive branch the authority to issue the regulation or to revoke a passport on national security or foreign policy grounds. The Federal appeals court affirmed that ruling in June.

Administration Position

In its request for Supreme Court review, the Administration told the Justices ''it is inconceivable that Congress intended to deprive the Executive'' of the authority to revoke a passport under such circumstances.

The Administration contended that the appeals court had been mistaken in relying on a 1958 Supreme Court decision, Kent v. Dulles, which held that the State Department could not prohibit the issuance of passports to members of the Communist Party.

In the Kent case, the Administration said, the denial had been based on the political beliefs of the passport applicants. In today's case, Haskie v. Agee, No. 80-83, the revocation was based not on Mr. Agee's political philosophy but on his specific actions.

Mr. Agee is represented by the American Civil Liberties Union. His attorney, Melvin Wulf, urged the Justices not to take the Government's appeal, arguing that the lower court opinion ''faithfully follows more than 22 years of right-to-travel jurisprudence.''

The Court also took the following actions today:

Campaign Funding

The Court agreed to review the constitutionality of the Federal Election Campaign Act's $5,000 limit on contributions to political action committees. The case, California Medical Association v. Federal Election Commission, No. 79-1952, was brought by the state doctors' group after it was charged with exceeding the limit in contributions to the California Medical Political Action Committee.

The appellants argue that the contribution limit violates their constitutional free speech rights. In a ruling four years ago, the Supreme Court upheld the $1,000 limit on contributions to individual candidates as well as an

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overall $ 25,000 contribution limit by individuals.

Parent's Rights

The Court agreed to decide whether a state can authorize an adoption over the objection of one of the natural parents of the child. The case, Johnson v. J.D.L., No. 80-45, is an appeal by a divorced father from a ruling that allowed his former wife's new husband to adopt the children.

The Court announced that the case would be argued in tandem with a case involving the conditions that a state must meet in order to remove a child permanently from its parents' custody. That case, Doe v. Delaware, No. 79-5932, was accepted last term and will be argued early next year.

Arrest Warrants

The Court agreed to decide whether an arrest warrant provides sufficient authorization for the police to enter a third party's home to search for the person named in the warrant. The question is the subject of dispute among the Federal appeals courts. Last year, in Payton v. New York, the Court established that an arrest warrant was sufficient for the police to enter the named person's own home, but did not settle the question of whether further authorization in the form of a search warrant was needed to enter a different location. The case is Steagald v. U.S., No. 79-6777.

Voting Rights

In a case involving the water district that supplies most of the drinking water for Phoenix, Ariz., the Court agreed to decide whether a state can bar persons who do not own property from voting in an election to choose directors of the special district. A Federal appeals court ruled that the property limitation was unconstitutional. Special districts that provide various municipal services are common throughout the country. (Ball v. James, No. 79-1740).

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Proprietary to the United Press International 1981
November 19, 1981, Thursday, AM cycle

SECTION: Regional News
DISTRIBUTION: Maryland
LENGTH: 218 words
DATELINE: WASHINGTON
BODY:

A spokesman for Sen. Charles McC. Mathias, R-Md., said Thursday inflation is the primary reason the senator is sponsoring a measure to boost the ceiling for individual campaign contributions to federal office seekers.

Under the proposed amendment to the 1971 Federal Election Campaign Act, the individual limit for a single candidate would be raised from $1,000 to $4,000. The annual contribution level an individual could make to all candidates in an election year would be increased from $ 25,000 to $40,000.

"The current level was set in 1974. If you look at the increase in inflation and the performance of the economy since then, you see things have virtually doubled," said Jack Eddinger, Mathias' press secretary.

Although he conceded Republicans have traditionally been able to raise more money than Democrats when contribution ceilings are relaxed, Eddinger denied the Mathias effort was a partisan one.

"That's not his intention at all," Eddinger said. "Republicans don't raise more money just because they're Rebublicans, anyway. It's because of the efficiency of their direct mail operations."

If approved, he said the amendments would also lessen the impact of political action committees, whose campaign contributions have been growing at a faster rate than those of individuals.

The Associated Press
The materials in the AP file were compiled by The Associated Press. These materials may not be republished without the express written consent of The Associated Press.

June 26, 1981, Friday, PM cycle

SECTION: Washington Dateline
LENGTH: 500 words
BYLINE: By KEVIN M. COSTELLOE, Associated Press Writer
DATELINE: WASHINGTON
KEYWORD:
Supreme Court of the United States-Political
BODY:

Unincorporated associations and individuals have no right to contribute more than $5,000 a year to any one political action committee, the Supreme Court ruled today.

By a 5-4 vote, the high court rejected a constitutional challenge to that part of the federal campaign financing laws.

The 25,000 -member California Medical Association challenged the amount it could contribute to its political arm, the California Medical Political Action Committee.

The high court's decision also made clear that the limit is constitutional as applied to an individual citizen's contributions.

At issue was the amount of money that can be contributed to political committees not affiliated with any one particular candidate.

Such political action committees have expanded recently both in number and influence.

In May 1980, the 9th U.S. Circuit Court of Appeals upheld the limit, which is one of several included in the Federal Election Campaign Act, saying it did

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not violate the medical group's rights.

Today's opinion affirms that appeals court ruling.

"(The association's) claim of unfair treatment ignores the plain fact that the statute as a whole imposes far fewer restrictions on individuals and unincorporated associations than it does on corporations and unions," Justice Thurgood Marshall wrote for the majority, denying the group's claim that it was denied equal protection of the laws.

Under the same law, the medical association's individual members are free to donate $5,000 each to a number of political action committees, subject to a $ 25,000 ceiling on contributions.

Labor unions and corporations are allowed to contribute unlimited amounts of administrative support to their political committees.

However, unlike unincorporated groups, corporations and labor unions are prohibited from contributing directly to the support of federal political campaigns.

The segment of Marshall's opinion saying that the restrictions do not violate the group's freedom of speech attracted only three other votes.

Voting with Marshall to uphold the appeals court ruling were Justices Byron R. White, Harry A. Blackmun, John Paul Stevens and William J. Brennan.

Justice Potter Stewart, joined by Chief Justice Warren E. Burger and Justices Lewis F. Powell and William J. Rehnquist, dissent on procedural grounds.

In 1976, the Supreme Court upheld major portions of the same campaign financing law.

Current law allows individuals and various groups to contribute up to $1,000 to each candidate and his committee in a federal election.

And, among other things, it places a $5,000 limit on contributions by multi-candidate political committees to a candidate or his own political committee.

The political action committee in today's case qualified as a multi-candidate committee because it received contributions from numerous supporters and gave contributions to at least five candidates.

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INTRODUCTION

When Walter Mondale formally announced on February 21, 1983, his candidacy for the Democratic nomination for the office of President of the United States, he promised that he would refuse to accept political action committee (PAC) contributions for his campaign. At the same time, he pledged his support for proposals that would extend government financing to all federal elections.

Similar positions taken by Senator Gary Hart and others seem to be the latest response to the steady drumbeat, by groups such as Common Cause and by the media throughout the 1982 elections, against PACs and their alleged pernicious effects on the electoral process. The claim is that corporate, trade association, and other "special interest" PACs allegedly "buy" the votes of congressmen with contributions for their increasingly expensive campaigns, and that this erodes the confidence of the public in their elected officials.

Special criticism is heaped against those PACs that engage in independent expenditures because such efforts allegedly exploit the "loopholes" in the election law's strict limits on campaign contributions and are made by groups that critics claim are unaccountable to the political system. The solution prescribed for these "problems" is to eliminate or sharply curtail PAC contributions and independent expenditures, and to substitute public financing for congressional and senatorial elections similar to that provided for presidential elections. These election "reforms," embodied in one form or another in legislative proposals introduced in the last Congress, are now being reintroduced in the 98th Congress. Hearings were held before the Senate Rules Committee in late January, and more are expected before that Committee and the House Administration Committee as well later this spring.

The trouble is that the "reform" proposals largely ignore (1) that PACs in fact play a relatively minor role in financing federal elections; (2) that the source of PAC money is many individuals who share common beliefs and voluntarily pool small contributions; (3) that PAC contributions are fully disclosed under the current law so that voters can determine for themselves whether their elected leaders are voting in the constituents', or some "special," interest; (4) that the so-called loophole exploited by independent expenditures is nothing less than the First Amendment right of free speech and association; (5) that the great majority of the American public opposes taxpayer financing of elections; and (6) that more regulation will only increase the power of the Federal Election Commission, a bureaucracy that has consistently trampled upon basic rights and freedoms, the latest example of which, discussed briefly herein, are proposed FEC regulations sent to Congress for its consideration on March 1, 1983, which, if not vetoed, would seriously limit the rights of corporations and expand those of unions.

interest not to curtail PACs and private contributions. Instead, the political process should be opened further to encourage more direct citizen involvement in democracy's fundamental function: the selection of its leaders.

HISTORY OF CAMPAIGN FINANCE REGULATION

The Tillman Act of 1907 was the first such regulatory law to be enacted. It prohibited national banks and corporations from making money contributions in connection with federal elections. The primary reason for this was the notion

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that boards of directors should not use stockholders' money for political contributions. In addition, there was concern that large amounts of money would have an undue influence, not on the candidates, but rather on the electorate in choosing its leaders. n1

n1 President Theodore Roosevelt in his 1905 annual message recognized that "in political campaigns in a country as large and populous as ours it is inevitable that there should be much expense of an entirely legitimate kind. This, of course, means that money contributions, and some of them of large size must be made. . . ." 40 Cong. Rec. 96 (1905). The following year President Roosevelt further advocated "let individuals contribute as they desire. . . ." 41 Cong. Rec. 22 (1906). In 1907, President Roosevelt proposed what he considered a "very radical" concept of public financing -- one that provided monies only to the major national parties, while still permitting individual contributions to candidates. The reason stated for such public financing did not appear to be in response to any issue of corruption, but merely to be an expedient solution to the problem of the major parties raising large amounts of contributions. 42 Cong. Rec. 78 (1907). This reason of "expediency" for public financing as well as others are analyzed and refuted later in this paper. For an excellent historical and constitutional analysis of the legislation regulating campaign finance, see Bolton, "Constitutional Limitations on Restricting Corporate and Union Political Speech," 22 Arizona Law Review 373 (1980).

In 1910, Congress passed the first law requiring political committees to disclose contributions and disbursements, but much of it was ruled unconstitutional by the Supreme Court in 1921. Four years later, Congress enacted the Federal Corrupt Practices Act, which continued the prohibition of money contributions on the part of corporations and further barred their making contributions of "anything of value" or "in-kind" contributions.

In 1940, the Hatch Act, which banned overt partisan involvement by most federal employees, was modified to prohibit any political committee from raising or spending more than $3 million dollars. Individuals and political committees could give no more than $5,000 to any candidate or political committee. There was no limit on the aggregate amount of money that could be given by individuals or groups to various committees, which could then direct those sums to the same candidate. There were limited provisons for disclosure of contributions and independent expenditures.

As part of the Smith-Connally Act of 1943, Congress extended the coverage of the Corrupt Practices Act to labor unions, who were thereby prohibited from making any political contributions. The debate surrounding this measure reveals that Congress for the first time had begun to address the regulation of the political participation of other interest groups in addition to corporations.

In 1947, the Taft-Hartley Act amended the Corrupt Practices Act to prohibit labor unions' use of union treasury funds for expenditures, whether those expenditures were independent or not Subsequent court decisions, however, limited the extent of this prohibition.

In 1971, Congress enacted the Federal Election Campaign Act, which limited the amount candidates for federal office could spend on media promotions; limited the amount they could contribute to their own campaigns; required fuller disclosure of receipts and expenditures; and established a public financing mechanism to fund future presidential elections. There were no limits on contributions to individual candidates.

As part of its "post-Watergate" reforms, Congress amended the law in 1974 and imposed for the first time strict contribution limits and detailed recordkeeping and reporting requirements. It also established the Federal Election Commission as an independent regulatory agency to administer and enforce the law, with

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the authority to promulgate regulations, issue advisory opinions, conduct audits, and file civil lawsuits. The 1974 law retained the prohibition of corporate and union contributions and expenditures, but, apparently to accommodate prior court decisions, provided that a corporation or union may establish a "separate segregated fund" consisting of voluntary contributions from employees and union members. This "separate segregated fund" has become the well-known PAC (political action committee). Another category of political action committees includes those that are not sponsored by a parent organization but are independently organized. These PACs are known as the "ideological" or independent PACs, and their funds are contributed to candidates. n2

n2 Corporations and unions were permitted to use funds from their treasuries to defray administrative expenses of their political committee, thereby undercutting to some extent the notion in 1907 that corporate directors should not use stockholders' money for political uses.

Under the 1974 law, individuals were limited to contributing no more than $1,000 per candidate per election, with an annual overall aggregate limit of $ 25,000 for all political contributions. Multi-candidate committees, i.e., political action committees, could contribute up to $5,000 to a candidate although there was no overall aggregate limit of the amount that a PAC could give. Independent expenditures were limited to $1,000 dollars, and candidates were limited as to the amount of money they could spend for their own campaigns.

After a coalition of liberals and conservatives filed a lawsuit challenging the 1974 amendments, the Supreme Court in Buckley v. Valeo struck down, as a violation of the First Amendment, any limits on independent expenditures and on the amounts a candidate can use of his own money to promote his own campaign. The Court also ruled that the Federal Election Commission as constituted violated the constitutional system of appointing officers of the United States. The Supreme Court did uphold, however, the contribution limits and disclosure provisions of the Act but only after carefully balancing the constitutional rights of individuals to participate in a campaign with the power of Congress to regulate elections. The Court also upheld the Presidential public financing scheme and the limits on expenditures of those presidential candidates who accepted public funding. The case did not raise, nor did the Court address, any of the issues relating to restrictions on corporate political activity.

Congress responded in 1976 to the Buckley decision by reconstituting the FEC and recodifying those provisions of the 1974 law left intact by the Supreme Court:

* Individuals could contribute only $1,000 to a candidate per election; $5,000 to a political committee; and $20,000 to the national committee of a political party, so long as the annual aggregate of all political contributions did not exceed $ 25,000.

* Multi-candidate committees (PACs) could contribute only $5,000 per candidate per election, with no overall aggregate limit. Affiliated committees were deemed to be a single committee for purposes of applying the contribution limits.

* Political party committees were given higher contribution and expenditure limits based on various formulas.

In its 1976 action, Congress further restricted the ability of corporate and labor political action committees to solicit contributions by limiting the class of persons who could be solicited. But on March 1, 1983, the Federal Election Commission issued proposed amendments to their regulations that would, among other things, greatly expand the permissible class of persons unions may solicit to include not only their own union members, but also the union's executive and administrative personnel and their families, many of whom are members of another union or no union at all. Such a proposed change in favor of the unions is

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clearly contrary to the current law which limits solicitations only to the union's own members. At the same time, the proposed regulations would sharply limit the rights of corporations to engage in activity that heretofore was thought to be permitted by the First Amendment.

Unless vetoed by either House of Congress within 30 legislative days, i.e. mid- to late April, the proposed FEC regulations would:

* Make it illegal for a corporation to invite a Congressman who is a candidate to visit the factory or plant and meet with company officials and employees or attend a company picnic or function unless the company offers "the same opportunity" to all other candidates for the seat held by that Congressman. The rule could be triggered even if the Congressman is primarily invited to attend for reasons relating to his legislative capacity. This absurd and constitutionally defective rule is akin to the Federal Communication Commission's "equal time" rules that are fraught with regulatory and bureaucratic dangers. Should the Socialist Workers' Party candidate invoke his right to the "same opportunity" to appear, does that mean the company must hold another company picnic or convention, or conduct the same plant tour as the Congressman had, meeting the same people, and for the same length of time? Yes, according to the reading of the proposed regulation.

* Make it illegal for a corporation to have a representative of a political party, such as a county chairman, to "meet employees" of the company unless "the same opportunity" is given to representatives of all other political parties, even those fringe political parties who do not have candidates on any ballot, as long as they "are actively engaged in placing" a candidate on a ballot in some state.

* Make it illegal for any employee -- executive or rank and file -- to "support or oppose any candidate, group of candidates or political party" before, during, or after i.e. "in conjunction with," the Congressman/candidate's appearance at the company. Mere applause for the speaker could be considered showing "support."

* Make it illegal for corporations to publish views expressed by candidates on issues unless "equal time" is given to all candidates, and the questions posed to the candidates pass FEC censors to insure that the "wording of the questions presented does not suggest . . . any position on the issues covered." For example, a defense contractor would probably not be allowed to ask the candidate whether he favored building the B-1 bomber.

* Allow for unions to engage in "nonpartisan," get-out-the-vote" drives, including donating compulsory dues monies to nonprofit groups such as Planned Parenthood to conduct voter registration drives. Ostensibly, corporations are given the same right, but experience clearly shows that such regulations will benefit organized labor and activist organizations. Indeed, the Commission expressly stated in its alleged "justification" for these regulations, that the proposed rule allowing nonprofit corporations to conduct voter registration was designed to codify an earlier FEC ruling given to Planned Parenthood of New York City allowing them to register their patients and families. Even that ruling had forced a dissenting Democrat Commissioner to label it "specious ratiocination."

* For the first time, the meaning of "corporation" first used in the 1907 law referring to large economic entities, will be expanded in these rules to encompass any entity that is technically incorporated, that is, "corporations without capital stock" such as nonprofit organizations. Thus, a presidential or other candidate could not speak to or meet students at a University, or members of a church, without triggering all the labyrinthian rules applicable to business corporations, such as "equal time" and the like.

These proposed regulations clearly demonstrate all that is wrong with the FEC

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controlling political activity. To the extent that these proposed changes are intended to incorporate earlier FEC advisory opinions and rulings, that in itself is an admission by the FEC that those rulings were illegal since the law expressly forbids the FEC to issue opinions without first proposing them to Congress as regulations. In other words, the FEC is engaging in a post hoc justification for their misguided rulings. Thus, there are ample procedural and substantive reasons why Congress would do well in vetoing the proposed rules.

PACS: THE MYTHS AND REALITIES

Despite the attention they receive, PACs play a relatively minor role in campaign finance or in influencing legislation. Examples:

* Of the approximately $300 million raised by candidates in the 1981-1982 election cycle, all PACs -- labor, corporate, trade/membership, and ideological -- accounted for less than 27 percent.

* Corporate PAC contributions accounted for less than 10 percent of candidate receipts for the 1982 election.

* Of the 3,371 PACs registered with the FEC as of December 31, 1982, approximately 700 raised and spent no money; 50 percent of all PACs raised and spent less than $10,000 during 1981-1982.

* The average corporate PAC contribution is approximately $500 which is only 0.04 percent of the average cost of a successful Senate campaign and 0.25 percent of the cost of a House campaign.

* Less than .06 percent (6/10,000) of all corporations have PACs.

* The average contribution to a PAC is $10-$20. n3

n3 The average contribution to three of the largest PACs is as follows: American Medical Association PAC -- $30; Fund for a Conservative Majority -- less than $25; Realtors PAC -- $12.33.

Rather than representing a monolithic force as is sometimes charged, PACs reflect the multitude and variety of interests that compose a democratic and pluralistic society from agriculture, building trades, environment to education, energy, defense. Through PACs, Americans can exercise their constitutional rights of freedom of association and speech. There are conservative PACs and liberal PACs. There are PACs that favor abortion and those in opposition. The list goes on and on. So varied and diffuse is PAC power that PAC influence seems marginal.

In Senator Dave Durenberger's (R-Minn.) 1982 race, for example, all PAC contributions together comprised approximately 25 percent of the funds for his $4 million campaign, but the average PAC contribution amounted to only 3/100 of 1 percent of his total campaign expenditures. As he told the Senate Rules Committee this past January:

Under no circumstances could these legally limited contributions be deemed significant enough to make any Senator "beholden" to the contributor, or for that matter, any more thankful to the PAC than to any of the 34,200 individual contributors who also supported the campaign.

Nor do I believe there is a qualitative difference between PAC contributions and individual donations. PAC funds come from individual large numbers of individuals who contribute to their political action committees. I do not understand why a $1,500 contribution from the ACME PAC can be deemed pernicious, while a contribution of equal size from the President of ACME or several of its stockholders is not.

It is no wonder that, of the hundreds of votes cast in Committees and Congress, critics can point only to a couple of examples that indicate a hint of PAC money influence.

The favorite case study purportedly showing vote buying that is often cited by Common Cause, an advocacy organization critical of PACs, in the action of

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Congress last year that killed a proposed Federal Trade Commission rule that would have required used car dealers to disclose to purchasers known defects in a car. The proposed FTC rule was so vague that even lawyers had to guess at its meaning. Violators were to be subject to fines of up to $10,000, even if the dealer honestly did not recognize the so-called defect, or even if the buyer already knew of the undisclosed defect before purchasing the car.

The rule was to be applied only to used car dealers. This would have discriminated against them, for they constitute only half of the re-sale market in used cars, and would have given private sellers a built-in competitive advantage. Used car dealers would be forced to pass the costs of this regulation on to the consumer. This vague and costly rule, moreover, was proposed at a time when car dealers were suffering a business slump. It is not surprising that it was defeated by a House vote of 286-133.

Common Cause and Ralph Nader's Congress Watch have tried to demonstrate that this rule was defeated not on its merits, or lack thereof, but because of the alleged influence of contributions from the automobile dealers' PAC to the Congressmen who defeated the bill. But even their own figures show that 52 of the Congressmen who voted to kill the rule received no money from the dealers' PAC, and that 41 who did receive the PAC money voted to save the rule. The correlation between votes cast and money received fails utterly to make a case for causation. n4

n4 Paul H. Rubin and James B. Kau, professors of economics at Baruch College and the University of Georgia respectively, have been professionally examining the correlation between votes and contributions for a number of years using sophisticated econometric models and have concluded that "the fear of business PACs is overestimated." Their research and evidence found that ideology is a strong motivating factor that explains voting. Thus, PACs, just like individuals, make contributions to incumbents and challengers to support those candidates whose basic philosophy on government, economics, and other issues is already in concert with the supporters of the PAC.

It is difficult to understand why direct PAC contributions to candidates are widely criticized, yet a PAC's soliciting and forwarding to the candidate "earmarked" contributions from the public are not. For example, the Council for a Livable World (CLW), a PAC larger than 99 percent of all other PACs, regularly solicits its supporters to send in contributions payable directly to suggested liberal candidates who support reduced defense spending and the nuclear freeze. CLW then forwards those contributions to the candidates. In this manner, CLW was able to contribute, for example, at least $23,200 to Senator Paul Sarbanes (D-Md.), $23,900 to Senator Howard Metzenbaum (D-Ohio), and $26,500 to Congresswoman Millicent Fenwick (R-N.J.) in 1982. If this "earmarking" procedure is regarded as beneficial as it certainly must be because the PAC acts as a catalyst to citizen involvement in the political process, then it is no different from other PACs, all of whom serve that precise function, regardless of whether contributions are earmarked or not.

If the critics of PACs are truly concerned about election financing reform, they should focus on the abuses like unaccounted expenditure by labor leaders of hundreds of millions of dollars out of compulsory union dues for "in-kind" and unreported political support as telephone banks, canvassing, and the like, in addition to the support costs of the union PACs. No union member or any other American should be forced to subsidize political beliefs they object to. A recent lawsuit in Maryland against the Communication Workers of America revealed that almost 80 percent of a worker's compulsory dues were used for the political activities of the union. n5 A proposal by Congressman William Dickinson (R-Ala.) and Senator Jesse Helms (R-N.C.) would correct this problem and protect individual rights by ensuring that political activity is funded voluntarily.

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n5 The amount expended by corporations from their treasuries for political activity is but a small fraction of that spent by labor unions. And in response to those who argue that the union's use of compulsory dues for political purposes is no different than a corporation's use of stockholder's money, Justice Brennan of the Supreme Court accurately observed: "[W]hile a stockholder acquires his stock voluntarily and is free to dispose of it, union membership and the payment of union dues is often involuntary because of union security and check-off provisions. . . . It is therefore arguable that the federal interest in the relationship between members and their unions is much greater than the parallel interest in the relationship between stockholders and state-created corporations." Cort vs. Ash, 422 U.S. 66, 81, n.13 (1975).

HOW THE FEC ENFORCES THE LAW

The Federal Election Commission has added to the problems and confusion of campaign financing by selected overzealousness in enforcing complicated and vague laws. A number of FEC actions make this point:

FEC v. CLITRIM

The FEC spotted what it regarded as a violation of the election laws in New Jersey and New York where citizens' groups had spent $135.00 circulating handbills describing the voting records of incumbents on tax and spending issues. The FEC spent over $50,000 prosecuting this group. After several years of litigation, the entire panel of the U.S. Court of Appeals for the Second Circuit dismissed the case, with Chief Judge Kaufman observing:

[T]he insensitivity to First Amendment values displayed by the Federal Election Commission (FEC) in proceeding against these defendants compels me to add a few words about what I perceive to be the disturbing legacy of the Federal Election Campaign Act (FECA), 2 U.S.C. @@ 431, et seq.

I find this episode somewhat perverse. It is disturbind because citizens of this nation should not be required to account to this court for engaging in debate of political issues.

Our decision today should stand as an admonition to the Commission that, at least in this case, it has failed abysmally to meet this awesome responsibility.

FEC v. Reader's Digest and The Pink Sheet

In two separate 1981 lawsuits, the FEC attacked the Reader's Digest and The Pink Sheet on the Left, a conservative newsletter published by Phillips Publishing, Inc. Their alleged offense was publishing statements critical of Senator Edward Kennedy (D-Mass.) during the 1980 election. In the case of the Pink Sheet, the FEC issued subpoenas and sought their enforcement in court demanding the names and addresses of all the editorial staff of the Phillips Publishing, Inc., as well as all its bank accounts. In both cases, it took federal courts to rein in the FEC. As in CLITRIM, tens of thousands of taxpayer dollars were spent on this assault against the First Amendment.

FEC v. Massachusetts Citizens for Life

The FEC has filed a federal suit against a pro-life citizens' group that distributed a brochure indicating various candidates' positions on abortion. This nonprofit group is incorporated as a not-for-profit corporation, as are most charitable, religious, and educational institutions and associations. The FEC claims that this citizens' group is violating the provisions of the law that prohibit corporate contributions and expenditures. This case clearly assaults the First Amendment rights of individuals as well as corporations, whether the corporation were concerned as here, with a social issue or whether in another context, it were concerned with economic issues.

Dozens of such questionable lawsuits have been brought. In addition, there are hundreds of cases where citizens or candidates have been forced to capitulate to FEC demands. Furthermore, these examples do not include the thousands of pages of confusing regulations and advisory opinions that the FEC

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has issued restricting the legitimate expression of views and other lawful political activity.

A rule that has caused the most regulation and confusion among corporations, trade associations, membership organizations, and unions alike sharply limits the class of persons that a corporation, membership, or union PAC can solicit for voluntary contributions and the method of such solicitations as well. Currently, they can solicit only their stockholders, executive employees, or members. And yet the law allows anyone else to contribute to those PACs so long as they are not solicited first.

The FEC thus clearly impedes the political process and serves no valid public interest other than as a repository of campaign reports. It should be abolished or its enforcement powers transferred to the Justice Department, which already has responsibility for enforcing laws on bribery and obstruction of justice. These laws were enacted to protect the integrity of the political process. They were the basis for the indictments and convictions of those involved in the Watergate and Abscam cases, the attempted bribery of former Senator Howard Cannon by a Teamsters' official, and the case of a feminist who tried to bribe an Illinois legislator to vote for the Equal Rights Amendment. What the U.S. does not need is an FEC law that makes criminals of citizens who engage in legitimate political activity.

THE CASE AGAINST TAXPAYER FINANCING OF ELECTIONS

Together, the 1976 and 1980 presidential elections cost the taxpayers approximately $175 million. Because of built-in cost-of-living increases in the public financing law, the Office of Management and Budget has estimated that approximately $140 million of the taxpayers' money will be given away for the 1984 election. Indeed, presidential aspirants for the 1984 election already have begun to line up. Some want public financing extended to congressional and senatorial races. Yet such financing schemes do not serve the public interest well and should not be substituted for the current voluntary financing system.

Where does this money come from? Even before indicating his filing status, the American taxpayer is asked by the Internal Revenue Service on the individual income tax return whether he wants one dollar to go to the Presidential Election Campaign Fund. nó The impression given is that only those taxpayers who earmark their dollar to the fund are paying for the system. In fact, the dollar "check-off" is merely an accounting mechanism for computing how much money is to be appropriated each year out of general treasury revenues for the presidential election campaigns thereby reducing receipts available for other budget items. Thus, all taxpayers bear the burden of funding the campaigns even of those candidates whom they may oppose. Only 28 percent of the taxpayers checked "yes" on their 1980 returns and 27 percent, in 1981. Over 70 percent of American taxpayers apparently do not approve this financing scheme. This amounts to a referendum that indicts the system and manifests the public's rejection of paying for elections out of the the U.S. Treasury. It is reason enough for abolishing rather than extending the public financing of elections.

nó The first line of IRS Form 1040 asks, "Do you want one dollar to go to this fund? . . . . Checking 'yes' will not increase your tax or reduce your refund." A more informed request, however, should be cast in terms of something like, "Do you want over $100 million dollars of taxpayers' money to be given to political candidates and political parties not of your choice for their campaigns? . . . . Checking 'no' may decrease your taxes next year." Such an inquiry could only engender a resounding negative response to public financing.

Where does this money go? Under the current system, any candidate running in a presidential primary election, after meeting a minimum threshold of fundraising, can receive matching funds for each campaign contribution received, the matchable portion of which cannot exceed $250.00. Candidates of the major

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parties in the general election automatically receive complete and full public financing, approximately $30 million dollars each in 1980. The major national party committees are each given $4.4 million dollars to pay for the costs of their nominating conventions. Minor or new party candidates are eligible to receive a percentage of what the major parties receive. A variety of minor party and fringe candidates can qualify for this federal funding. Socialist, Communist, and Nazi Party candidates are all eligible and welcome to apply for and receive taxpayer funds if they meet the threshold requirements.

Should the American taxpayer be forced to pay for political campaign expenses? Clearly not, for it requires a taxpayer to subsidize political beliefs that he or she may oppose. Experience shows that grass-roots efforts in the presidential general election have been substantially curtailed since candidates, as a condition for receiving full public funding, are prohibited from receiving any kind of private support. Moreover, public financing injects the federal government into the sensitive area of regulating the political and electoral process. n7 Rather than more public financing of partisan activity, the nation needs relaxation of such strict controls to allow more private voluntary contributions from persons, either as individuals, or together as political action committees.

n7 For example, does public financing of a candidate who advocates prayer in schools or the advancement of religious principles, violate the Establishment Clause of the First Amendment? Could such a candidate purchase and distribute Bibles or other religious materials or literature with the public funds received? Are recipients of public funds for campaigns subject to the myriad of laws and regulations applicable to other "grant" recipients of public funds, such as affirmative action rules and the like? The possibilities of government interference in the electoral process are limitless.

"Public Financing Will Reduce the Influence of Private Contributions"

A principal reason advanced for government financing of elections is that such public funding would eliminate the alleged pernicious influence of private funds on the candidate.

A common feature of all the proposals is a system of matching funds. Under such a system no more than half of a candidate's campaign funds can be publicly financed. At least 50 per cent must come from voluntary private sources. n8 Since the current sources of private financing represent hundreds of various and often competing interests, rather than a monolithic force singular in purpose, what difference is there in the amount of influence that is allegedly "bought" by a $500 dollar private contribution (whether it be from an individual or a PAC) in a system that is completely private and voluntary, as opposed to that same $500 dollar private contribution given in a public financing matching system? If the $500 dollar private contribution in a private system is so pernicious, why is not that same $500 dollar contribution pernicious in the matching fund system. Indeed, if the degree of "perniciousness" is measured by the amount of money given, then a $500 contribution in a matching fund system is twice as pernicious since that $500 is really worth $1,000 to the candidate, on the basis of the matching portion from the Treasury funded by anonymous taxpayers. n9

n8 Experience with public financing of presidential primary elections reveals that approximately two-thirds of the $95 million dollars spent for the presidential primaries in 1980 were from private sources and less than one-third came from Treasury matching funds.

n9 This is assuming that the $500 is fully matchable. Whatever the exact formula devised for matching, the principle is the same: a private contribution is worth more in a matching fund system than in a strictly private system.

And even if PAC contributions were not matchable or were limited in an

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aggregate or percentage amount under some of these proposals, a $500 contribution, the average contribution given by a PAC today, would still be permitted. Further, nothing prevents the president of a corporation, union, or trade association from giving a personal and matchable contribution to the candidate. In fact, under any of the proposed matching financing systems, most candidates would still be able to receive roughly the same amount of PAC contributions that they receive under the current system, if not more.

Thus, if the advocates of public financing are truly concerned about eliminating what they claim are the abuses of private financing, they must disavow any concept of a mixed or matching system and advocate a full 100 percent system of public financing. Perhaps realizing this inherent inconsistency, Common Cause and other proponents of partial public financing argue that matching funds can "magnify the importance of small individual contributors." But this is precisely the function of PACs, which receive and collect many small contributions from individuals -- at no cost to the public Treasury. To accept the argument that a matching fund system is good because it enhances the value of private contributions is to reject the concept of complete or full public financing because such a system flatly prohibits any kind of private contribution to the candidate. Advocates of taxpayer financing cannot have it both ways.

"Campaigns Cost Too Much"

Many advocates of public financing believe campaign costs are too high and should be limited. Yet public financing does not decrease the cost of a campaign. Television or newspaper advertisements cost the same whether they are paid for by taxpayers' funds or by private voluntary contributions. What proponents of public financing believe, however, is that overall limits on campaign spending can be imposed by legislation if the recipient decides to take public funds. The Supreme Court in Buckley v. Valeo so ruled with respect to limits on presidential campaigns that are publicly financed.

Whether the costs of individual campaigns are too high or not is a relative question, which hardly seems appropriate for consideration by the federal government. As an aggregate amount, the $300 million dollars spent on all 1982 federal elections may seem high, but may be modest in comparison, for example, to the $600 million dollar annual advertising and public relations budget for Procter and Gamble. Surely, the promotion of views of candidates and the education of the electorate on political issues is at least as valuable as the promotion of the commercial products of one company. Even such supporters of public financing as the American Bar Association reject limiting the amount of campaign expenditures.

Will the imposition of spending limits on those who accept public financing lower the aggregate costs of campaigning? Review of the various matching fund proposals indicates that there would be little, if any, reduction. A wealthy candidate, such as Minnesota's Mark Dayton, who lost a costly bid for a Senate seat, could afford to forego public funds and spend his own money which cannot be constitutionally limited. Meantime, marginal candidates will be encouraged to line up for public funds. Accordingly, under a public financing scheme, the aggregate costs of campaigning could well increase rather than decrease.

"The Public Already Pays For the Cost of Elections"

In his opening statement during hearings held before the Senate Rules Committee on January 26, 1983 concerning campaign finance, Chairman Charles McC. Mathias (R-Md.) said:

No one should be so naive or so foolish as to think that the public isn't already paying for this billion-dollar election. n10 If the money is contributed on behalf of some large economic interest, the odds are 100 to 1 that much of that contribution ends up, directly or indirectly, as a deductible expense. And

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if I am wrong about that, it is bound to end up as one of the overall costs of doing business which are passed along to consumers. So either as taxpayers or as consumers, the public pays that billion-dollar cost.

n10 Senator Mathias estimated that $1 billion was the total cost of the 1982 elections, counting $300 million for federal elections and approximately $600 million for state and local races.

This observation is dead wrong. In the first place, PAC funds consist of voluntary contributions given by individuals. Corporations have been barred since 1907 from making contributions to campaigns. Therefore, a contribution made to the candidate by the PAC in no way is or can be considered a "deductible expense" to the PAC's sponsoring corporation under the tax laws. A PAC contribution simply is not a "cost item" to the corporation passed on to the consumer and no accountant would ever consider it one. n11 Corporate PACs, moreover, account for only a small share of campaign receipts.

n11 Corporations are permitted to defray certain administrative costs of the PAC, but the Internal Revenue Service has disallowed the deductibility of this cost. Further, there are many PACs that defray most or all of their operating expenses with their voluntary PAC money rather than with corporate money.

Nevertheless, there is some truth to what Senator Mathias says. The cost of elections is indeed paid for by the public, but it is a self-selected group who pay through voluntary donations to candidates, PACs, and party committees. Public financing would force a change from a voluntary to a compulsory system paid for by the taxpayers who have consistently and overwhelmingly rejected the notion.

"Soliciting Voluntary Contributions Is Demeaning"

Many of its proponents argue that public financing is needed because soliciting private voluntary contributions is "demeaning." Senator Mathias refers to fundraising as "the most demeaning part of the whole political process." Senator Thomas Eagleton (D-Mo.) stated that he found it to be a "degrading spectacle of elected representatives completing detailed questionnaires on their positions" on issues of great concern to various segments of our society.

Others disagree. And indeed America's Founding Fathers did not think it "demeaning" to solicit support for their cause or explain their position on issues. An elected official should explain publicly his positions on issues and seek moral and financial support for them. Those who consider it demeaning to solicit private voluntary contributions for their campaigns apparently have no qualms, however, about taking money from the taxpayers without even stating their position on important issues.

THE CASE FOR INDEPENDENT EXPENDITURES

The 1974 campaign law not only placed strict limits on contributions to candidates and committees and required full disclosure, but also sought to place a $1,000 limit on the amount that a person or group could spend for independent expenditures. Independent expenditures are simply communications, whether in the form of leaflets, television advertisements, or other media, which expressly advocate the election or defeat of a clearly identified candidate, and are made without the direction or control of the candidate to be supported. If the particular expenditure is not made independently, it is considered instead as an "in-kind" contribution to the candidate and subject to the regular contributions limits.

In 1976, the Supreme Court in Buckley v. Valeo ruled that any limits on independent expenditures violated the First Amendment's guarantee of free speech and properly so. A government imposed limit on political spending is a government imposed limit on the amount of speech and communication. Whether such expenditures are viewed as "positive" -- those supporting a candidate -- or

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"negative" -- those attacking or opposing a candidate -- or whether in fact they hare or help the candidate is not the issue.

Although the Supreme Court has stated on many occasions that the First Amendment needs "breathing room," the Federal Election Commission and public financing champions such as Common Cause have been suffocating those rights. FEC regulations defining what expenditures can be considered "independent" are so vague and broad that they chill the legitimate expression of views. For example, assume that a citizen volunteers a weekend of his time to distribute leaflets for a campaign and is reimbursed ten dollars for expenses. Thereafter, the citizen has no further contact with the campaign, but subsequently decides to purchase a newspaper advertisement urging his fellow citizens to vote for the candidate. Under FEC regulations, 11 C.F.R. Section 109.1(b)(4)(i)(B), the advertisement is presumed to be a coordinated and possibly illegal expenditure because the individual had at one time been reimbursed by the campaign. Such regulations stifle completely legitimate and lawful communications and activity between a campaign and the making of an independent expenditure. This is not the kind of environment that fosters free and robust debate on important issues.

Some campaign public financing advocates consider the use of independent expenditures as a "loophole" in the contribution limits of the law, because while contributions to a candidate are limited, independent expenditures intended to help that candidate are not subject to the limits. To accept this argument would be to regard the First Amendment as a loophole.

Another criticism is that those who make independent expenditures are unaccountable to the political process and free to level charges against candidates. Groups that make independent expenditures, however, are held very accountable by their supporters. If their efforts are unsuccessful, the support stops. And while it is true that those who make independent expenditures may be unaccountable to the candidate, political party, or the government, that is precisely how it becomes a genuinely independent expenditure.

Critics object to those independent expenditures that fund attacks on a candidate; these are, it is claimed, "negative" and thus should be eliminated from political dialogue. Such criticism suggests that the federal government somehow act as censor or regulator of the content of the communication -- a notion wholly alien to the First Amendment.

In 1980, Common Cause and the Federal Election Commission filed suit in federal court against three organizations which were making independent campaign expenditures in support of Ronald Reagan. The legal basis of the suit was a provision in the public financing laws that limited independent expenditures in presidential elections to $1,000. A parallel provision in the election laws had been struck down as unconstitutional by the Supreme Court in the Buckley decision. Nevertheless, Common Cause and the FEC were arguing in the new suit that, in the context of public financing, the government can restrict independent speech of private citizens. A special three-judge district court unanimously ruled in 1980 against Common Cause and the FEC, stating that the law was unconstitutional. Common Cause and the Federal Election Commission immediately appealed to the Supreme Court. Before the Supreme Court, Common Cause and its President Archibald Cox essentially argued that citizens have only limited rights of speech and association under the First Amendment. If Americans, however, exercise their rights by contributing to a large and professional organization, they pose a danger to the electoral system. But the three-judge district court had stated that the speech of a large political committee is the speech of the thousands of small contributors. Without writing any opinion, the Supreme Court ruled 4 to 4 on the appeal, thus affirming the lower court by an equally divided vote.

Undaunted, the FEC has announced recently that it will continue to monitor

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independent expenditures with respect to presidential campaigns, giving the impression that they view the Supreme Court decision as not definitive. The Federal Election Commission and perhaps Common Cause are thus expected to renew their assault on the First Amendment in a future lawsuit, unless Congress repeals the provision limiting independent expenditures to conform with current rulings by the Supreme Court and the First Amendment.

CONCLUSION

The attacks by Common Cause, much of the media, and other critics of voluntary campaign financing systems against PACs and independent expenditures are actually attacks on the constitutional rights of citizens representing a variety of social, economic, and political interests to form voluntary political associations and committees. The suggested alternative of forcing taxpayers to pay hundreds of millions of dollars to candidates with whom they disagree politically would further inject federal regulation and control over political activity. This already has been rejected overwhelmingly by the taxpayers.

While most agree that disclosure has been beneficial, the restrictions on contributions and soliciting contributions have caused unnecessary regulation, limiting candidates' access to much needed financing. Through a system of disclosure only, the public can be the judge of whether a candidate is beholden to a special interest if he received $5,000 from his mother, which is currently illegal, or $500 from a corporate PAC, which is legal.

Campaign financing laws indeed need reform — not to expand the government's role but to enhance that of individuals. The current $1,000 limit to a candidate, for instance, was set in 1975 and is now worth about half that amount. Many agree it should be substantially raised. The overall aggregate annual limit of $ 25,000 makes no sense: If a citizen does not corrupt the system by contributing $1,000 each to 25 candidates, he certainly does not corrupt the 26th candidate by also giving him a contribution. (PACs do not have a similar limit.)

Even if the avowed purpose of contribution limits to candidates is to prevent the emergence of corruption, there is no compelling governmental interest in limiting the amount a citizen wishes to give to a PAC. PACs do not run for office or vote on legislation, and they are already limited as to how much they can give a single candidate. The limit on contributions to PACs thus should be abolished.

Some critics would like to limit the overall aggregate contributions from all PACs to a single candidate. This appears to be constitutionally suspect, however, as well as incorrectly based on the assumption that PACs are a monolithic force rather than representative of many different interests. The limits suggested, moreover, are arbitrary and fail to take into account the needs of particular campaigns.

Any attempt to limit independent expenditures would be unconstitutional. Proposals that would give candidates free media time if allegedly attacked by an independent expenditure also raise a host of constitutional and regulatory problems. Is an expenditure that describes the candidate's voting record an attack? Is a message that says "Vote for Candidate X because he is a big spender" an attack? Such a rule would discourage rather than encourage independent expenditures and would thus limit their use to those wealthy PACs who could afford not only the "attack" but the follow-up "counterattack."

The campaign laws do indeed need reforming, but the current proposals are not in the public interest. Congress would better serve the voters by opening up the system rather than imposing further restrictions, which would only add another layer to the already confusing and overly complex set of rules that regulate the financing of campaigns.

Nothing written here is to be construed as necessarily reflecting the views of The Heritage Foundation or as an attempt to aid or hinder the passage of

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any bill before Congress.

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LENGTH: 2870 words
HEADLINE: Congress's Appetite for Controversial Campaign Finance Reforms Diminishing
BYLINE: BY MAXWELL GLEN

HIGHLIGHT:

Congress hasn't amended campaign financing laws since 1979. Many Members say changes are overdue, but Democrats and Republicans can't agree on what to do.

BODY:

This year, Rep. David R. Obey, D-Wis., may make news for something he does not do.

In recent years, Obey has led the House fight to enact public financing of congressional elections. When that effort proved quixotic, he changed strategies. In the past Congress, he sponsored a modified public financing bill that would have increased the tax credit for contributions to congressional candidates who accepted certain limitations on receipts and spending.

Obey hasn't lost his desire for campaign finance reform, but he appears reluctant to play a prominent role on the issue in the 99th Congress. Part of his hesitation stems from his increasingly busy schedule; he recently became chairman of the Joint Economic Committee and the Appropriations Subcommittee on Foreign Operations. But his pessimism about the prospects for change may be the controlling factor.

"I'm still interested in the subject, but nothing has a snowball's chance in you know where of passing," Obey said. He said that he's "still looking at the situation and talking to people" but conceded, "I can count."

If Obey retreats from his perennial charge, some of his past co-sponsors may rise to succeed him. But his disillusionment is shared by many who believe changes in the Federal Election Campaign Act are long overdue. While many lawmakers see problems with the law, they cannot agree on solutions.

Since 1979, the last time Congress approved significant amendments to the law, there have been hundreds of proposals for further tinkering. The ideas have ranged from such sweeping changes as public financing and spending limits for congressional campaigns to merely adjusting contribution limits for inflation. While most of the bills barely gained a hearing, some, such as Obey's, attracted many co-sponsors.

Yet neither chamber has approved any of the changes. Many supporters and skeptics of campaign finance reform attribute the inertia to partisan politics: Democrats and Republicans don't want to give away competitive advantages.

"Reform is necessary," said Rep. Tony Coelho, D-Calif., chairman of the Democratic Congressional Campaign Committee. "But it won't be done with the Republicans controlling the Senate and Republicans in the White House."

"When you have a Republican Senate and Democratic House, these political deals aren't going to pass," added Bill Frenzel, R-Minn., the ranking minority member of the House Administration Committee, which has jurisdiction over many election-law bills. "You need to and some common elements that everybody agrees are needed."

But finding those elements requires more than a partisan divining rod. Proposed limits on political action committees (PACs), for example, draw mixed responses from Members of both parties. So do increased tax credits and suggested restraints on the use of television.

Incumbency, of course, is to blame for many Members' hesitancy to enact reforms; many officeholders fear bringing new uncertainty to a system under which they have succeeded. Reelection also tends to diminish some reformists'

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zeal: Sen. Gordon J. Humphrey, R-N.H., who sponsored campaign spending limitations in the past Congress, has lost interest in reintroducing the measure now that he has won a second term.

Common Cause president Fred Wertheimer, who has played a role in every major campaign finance reform effort since 1971, concedes that public outrage may be insufficient to bring the issue to critical mass. "Without a Watergate," Wertheimer said, "it's never going to be sitting [up] there with the national economy. It's not for a lack of information. You need a spark. You might need a couple of sparks."

Barring resurgent public interest, some influential Members don't intend to fan a flame where there is no fire. "I'm not [interested in] dealing with an issue that can't be done," Coelho said. "It's not a topic that's on the stove, let alone the front burner or back burner."

But two other pessimists -- Al Swift, D-Wash., chairman of the new House Administration Subcommittee on Elections, and Charles McC. Mathias Jr., R-Md., who heads the Senate Rules and Administration Committee -- said that their panels would hold hearings this year on various campaign finance bills. While most of the proposals are likely to be controversial, at least one -- a bill to create a bipartisan commission on campaign finance has a chance to pass this Congress.

Meanwhile, representatives of both major parties have met to discuss potential technical and substantive changes in the law. Out of these efforts, some insiders say, a consensus could emerge on something more than the fact that at this point, potential revisions are going nowhere. No one, however, expects any substantive changes until at least 1987.

FITS AND STARTS

Recent history shows that reform, if necessary, is possible. Since 1971, Congress has enacted major campaign finance legislation four times. Until 1971, there had been no significant legislation regulating congressional campaigns since the 1925 Federal Corrupt Practices Act, except for a public financing measure that was repealed shortly after its enactment in 1966.

Enactment of detailed disclosure requirements and certain expenditure limits in 1971 was considered then as being just short of revolutionary. Congress was understandably reluctant to travel in virtually uncharted waters.

But the increasing cost of campaigns, particularly presidential races, had fueled public demand for improving upon the much-ignored Corrupt Practices Act. Ironically, President Nixon's veto of campaign finance disclosure legislation in Congress rejected proposals for public financing, a new regulatory agency (though the Senate endorsed the idea) and contribution and spending limits.

But thanks, in part, to the new disclosure requirements, the law soon proved inadequate. Reporting violations in the thousands overwhelmed the House and Senate officials required to foward them to the Justice Department. The reports also revealed a pattern of contributions and spending that, according to Wertheimer, "were worse than you could imagine." Amid these findings, Watergate compelled an otherwise reluctant Congress in 1974 to enact limits on spending and contributions and create the Federal Election Commission (FEC).

While a provision to provide public financing of congressional campaigns lost by 47 votes in the House after passing the Senate, the 1974 amendments broke significant ground. Not only were contributions to a congressional candidate limited to $1,000 for individuals and $5,000 for PACs (single donors could give no more than $ 25,000 in all during an election cycle), but candidates also faced severe spending limits. Because of pressure from both business and labor, government contractors were allowed to operate PACs.

what is an election cycle ?

But in early 1976, spending limits on candidates and on independent expenditures on behalf of candidates were ruled unconstitutional by the Supreme

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Court in Buckley v. Valeo. Five months later, Congress responded with its second set of amendments to the 1971 act, which provided for presidential appointment of FEC commissioners, revised enforcement procedures and, significantly, removed limits on what candidates could spend on their own behalf.

When Congress moved to revise the law again, in 1979, there was nothing like Watergate or the Buckley case prompting action. Congress eased some administrative requirements, withdrew the FEC's right to conduct random audits of campaign reports and let political parties spend unlimited sums on grass-roots activities in presidential campaigns.

That provision, of course, caused headaches for Democratic Party strategists in 1984, when the GOP mounted a well-financed grass-roots effort on behalf of the Reagan-Bush ticket. But, at the time of its approval, the "party-building" measure was not controversial. Many Democrats believed that their party would benefit from it more than the Republicans.

Since 1979, fear of a "hidden agenda" has undermined each party's confidence in the other's proposals for further change. Given their fund-raising disadvantage, Democrats don't want to increase or eliminate the caps on party expenditures. The more affluent GOP generally opposes spending restrictions.

CROSSING PARTY LINES

But strictly partisan explanations tend to obscure the fact that campaign finance is an issue to which every Member of Congress brings personal experience. As a result, on specific proposals Republi- cans and Democrats line up together with sometimes surprising positions. Public financing of congressional elections offers a helpful illustration: Although often identified as a Democratic idea, it failed on several occasions during the 1970s to clear a Democratic-controlled Congress. Moreover, some of its most enthusiastic backers were Republicans.

Conservative Republicans have backed some of the most restrictive proposals in recent years. In the last Congress, for example, Sen. Ted Stevens of Alaska sponsored a constitutional amendment that would allow Congress to restrict over-all spending in federal campaigns. This year, Stevens has endorsed a bill sponsored by Sen. Barry Goldwater of Arizona that would not only abolish public financing of presidential campaigns but also limit total expenditures. Goldwater reportedly believes that the experience of recent years would persuade the Supreme Court to allow the measure to stand.

Goldwater and Stevens believe that without a cap on spending, wealthy candidates enjoy an unfair advantage over less affluent rivals. Goldwater faced that predicament in his last campaign. "I don't think [campaign spending] is a partisan issue at all," Stevens said.

Sen. Slade Gorton, R-Wash., also contends that self-financed candidates are a threat, but he has a different solution: tripling the contribution limits for candidates whose opponents spend a significant amount of their own money. Gorton plans to reintroduce a bill this year to do that.

Democrats also fail to agree, particularly on the PAC issue. Some of the most stringent PAC limitations have been proposed by Democrats; in general, they would limit a candidate's PAC receipts to a maximum dollar figure or to a percentage of a total spending limit. Sen. David L. Boren of Oklahoma, for example, would impose a $100,000 ceiling for PAC receipts on House candidates; Senate contenders would receive a higher limit, depending on the size of their state. Sen. William Proxmire of Wisconsin would limit PAC receipts to 30 per cent of an over-all spending limit.

But at a time when some Members have their own PACs, Boren and Proxmire are two of only three Senators (the other is Democrat John F. Kerry of Massachusetts) and a handful of House Members who, according to Common Cause, did not accept PAC contributions in their last campaign. (Boren conceded, in an

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interview, that he might in the future).

Democrats, in fact, are far more dependent on PAC money than Republicans are. According to a study of federal candidate receipts through Oct. 17, 1984, by Michael J. Malbin and Thomas W. Skladony of the American Enterprise Institute for Public Policy Research, PAC gifts in the past election cycle accounted for 45 per cent of the funds raised by House Democratic incumbents and 30 per cent of the money raised by Democrats challenging GOP incumbents. For the GOP the comparable figures were 37 and 17 per cent.

now many of its enthusiasts have retreated. After supporters lost a key Senate vote in early 1977, public financing legislation became more a parliamentary tool used to tie up other bills than measures that were considered seriously on their own merits.

More recently, public financing advocates have pushed an apparently more palatable alternative: increased tax credits for some contributions. This year, Sens. Proxmire and Christopher J. Dodd, D-Conn., have each sponsored legislation that would essentially increase from 50 per cent to 100 per cent the tax credit for certain contributions if the recipient agreed to limits on spending and on PAC receipts.

A proposal by Richard P. Conlon, executive director of the Democratic Study Group, would increase the credit without imposing spending or PAC restrictions; in the last Congress, Conlon's proposal, designed to encourage contributions from individual donors, was introduced in a House bill sponsored by Matthew F. McHugh, D-N.Y., and Barber B. Conable Jr., R-N.Y., now retired.

Conlon believes an increased tax credit has a fighting chance if it is not linked to an expenditure cap. "Even if we could come up with a spending limit that would make sense in 435 congressional districts, the Republicans would have a knee-jerk reaction against it," he said.

But Frenzel said that even a clean tax credit increase wouldn't be immune to bigger issues. "With the current bind on the budget," he contended, "tax credit bills are going to have great difficulty. The tax committees don't want to give new credits when they're already having trouble defending the old ones."

And Mathias said that if the tax simplification movement succeeds, the tax credit concept is "likely to go down the drain." In fact, the Treasury Department's tax reform proposal would abolish the presidential contribution checkoff and the existing 50 per cent tax credit for political contributions.

OUTLOOK

Logjams on such fundamental issues as tax credits and spending limits have encouraged some Members to suggest seemingly noncontroversial reforms, such as adjusting contribution limits for inflation. The $1,000 cap on individual contributions to federal candidates, for example, has not changed since 1974. But the consensus in Congress is that because of the sensitivity of campaign financing and the multitude and complexity of reform proposals, potentially noncontroversial changes ought to be part of a comprehensive reform effort.

Reform "is easier done in some kind of comprehensive context," said Rep. Swift. "It's not something you can do one step at a time."

That ostensibly places considerable pressure on Swift and Mathias, who chair the panels that would consider most of the proposed measures. Both have long supported public financing -- a position that puts them out of step with the majority of their colleagues.

Neither chairman sees light at the end of the tunnel. Swift intends to hold hearings first on election issues on which there is a broader consensus, such as news media projections based on exit polls "When there develops a consensus on campaign finance reform or on a bill that has bipartisan support, then the House Administration Committee will act," he said.

Mathias, who said he hadn't "given up" on public financing, gave a similar

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assessment for Rules Committee consideration of Senate reform proposals. "We don't have the votes to bring them out," he said.

Although Wertheimer said Common Cause will continue to concentrate on the House, Coelho and other House leaders are reluctant to act at least until after 1986. Another concern is the Supreme Court's pending decision in FEC v. National Conservative Political Action Committee and related cases. The FEC hopes the Court will overturn a lower court's ruling that the $1,000 limit on independent expenditures in the general presidential election is unconstitutional. The Court heard oral arguments last fall and is expected to rule by the end of its term in early summer.

The major parties are trying to sort out their differences, at least on noncontroversial items such as the much maligned state-by-state spending limit in presidential primaries. Last January, Peter G. Kelly, then national finance chairman of the Democratic National Committee, and Michael S. Berman, a former aide to Walter F. Mondale, met with a delegation of Republicans, including Frenzel, Rep. William M. Thomas of California and Republican National Committee counsel E. Mark Braden.

"The chances for anything happening are relatively low," conceded Braden, who prepared the GOP's list of approximately 35 proposals submitted to the Democrats. "The status quo is substantially advantageous to Republican candidates," he added, and "it's clearly more difficult for [the Democrats] to come up with a consensus than us."

But in the meantime, a proposal that enjoys bipartisan support may provide some Members short-term relief. Introduced last month in the Senate by Republican Warren Rudman of New Hampshire and in the House by Frenzel and Democrat Morris K. Udall of Arizona, the bill would create a bipartisan commission to evaluate and endorse suggested reforms.

"Quite frankly, I have never been a great believer in establishing commissions to solve public policy problems," said Rudman, who in separate bills has also proposed to restrict media advertising expenditures and content. But "this is an area where recent history teaches us that . . . any potential solution needs to be considered in a thorough and deliberate fashion."

For the time being, that may be the reformists' most palatable alternative.

GRAPHIC: Picture 1, common cause president Fred Wertheimer; ; Picure 2, Sen. Charles McC.Mathias Jr., Pictures 1 and 2, Richard A. Bloom

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KIRKLAND & ELLIS

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

200 East Randolph Drive
Chicago, Illinois 60601

312 861-2000

Facsimile:
312 861-2200

Gregg A. Garmisa
To Call Writer Direct:
312 861-2193

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OFFICE OF GENERAL COUNSEL

90 NOV 30 AM 12:39

November 29, 1990

VIA FEDERAL EXPRESS

Ms. Frances B. Hagan
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 3161

Dear Ms. Hagan:

I am enclosing Harold Simmons' Statement Of Designation Of Counsel for MUR 3161. This letter will also serve as Mr. Simmons' Response to MUR 3161.

Mr. Simmons, for his Response, incorporates by reference herein his Response to MUR 3104 dated September 24, 1990. A courtesy copy of that document is enclosed.

Mr. Simmons welcomes the Commission's decision to merge MUR 3161 into the pre-existing MUR 3104, and is prepared to begin the conciliation process immediately. On the subject of the merger, you mentioned that I would receive formal notification of the Commission's decision and the ensuing process. I would appreciate your transmittal of that notice at your earliest convenience.

Sincerely,

Gregg A. Garmisa

GAG:dg

Enclosures (2)

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STATEMENT OF DESIGNATION OF COUNSEL

MUR 3161

NAME OF COUNSEL: William S. Singer

ADDRESS: Kirkland & Ellis
200 E. Randolph Drive
Chicago, Illinois 60601

TELEPHONE: (312) 861-2000

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.

11/28/90
Date

Harold Simmons
Signature

RESPONDENT'S NAME: Harold Simmons

ADDRESS: 5430 LBJ Freeway
Suite 1700
Dallas, Texas 75240

HOME PHONE:

BUSINESS PHONE: (214) 233-1700

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UNITED STATES OF AMERICA
BEFORE
THE FEDERAL ELECTION COMMISSION

In Re Matter Under Review No. 3104 Harold C. Simmons, Respondent	RESPONSE OF HAROLD C. SIMMONS

INTRODUCTION

Respondent Harold C. Simmons ("Mr. Simmons"), through his attorneys, Kirkland & Ellis, submits this memorandum in support of his written request for conciliation negotiations dated September 7, 1990.

There are basically two factors to consider in this Matter Under Review ("MUR"). First, Mr. Simmons may have unintentionally or inadvertently breached certain provisions of the Federal Election Campaign Act (the "Act"). Second, and much more significant, Mr. Simmons fully intended to adhere to the Act at all times, and as soon as he learned of a potential compliance problem, he immediately adopted measures intended to correct any noncompliance. Mr. Simmons, therefore, respectfully submits that this controversy can, and should be, resolved speedily through the conciliation process.

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A. MR. SIMMONS TOOK ALL APPROPRIATE CORRECTIVE STEPS UPON LEARNING OF POTENTIAL MISINTERPRETATIONS OF HIS FEDERAL POLITICAL CONTRIBUTIONS.

1. Mr. Simmons learned of a potential problem through the media, but before that believed in the propriety of his conduct.

Mr. Simmons became aware of a possible compliance problem with the Act through a news story that appeared in the April 18, 1990 edition of the Los Angeles Times. See Affidavit of Harold C. Simmons ("Affidavit") attached hereto as Exhibit A. Prior thereto, Mr. Simmons believed that he was in full compliance with the Act. See Affidavit.

2. Mr. Simmons immediately moved to cure any defect.

Immediately thereafter, and prior to any notice from the Federal Election Commission ("Commission"), Mr. Simmons sought to correct any unintended exceeding of the spending limitations. See Affidavit. Mr. Simmons sent two letters (attached hereto as Exhibit B) to contributees from the 1988 cycle to ensure compliance with the Act. In those letters, Mr. Simmons explained the circumstances which generated this MUR as follows:

> First, I was unaware that certain contributions made in 1987 and 1989 to candidates standing for election in 1988 would be counted toward my 1988 limitation under FEC regulations. Second, I believed that certain contributions were to be recorded as joint contributions on behalf of my wife and me, but apparently not all records properly reflect this. The inclusion of 1987 and 1989 contributions in 1988 and the attribution of the entire amount of joint contributions to me alone had the effect of increasing my total contribution level beyond that which I had intended.

Exhibit B. One letter concludes with a request that the contribution be refunded and the other asks that the contribution be

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redesignated as a joint contribution from Mr. and Mrs. Simmons. (A complete list of recipients of those letters is attached hereto as Exhibit C.)

3. Mr. Simmons' efforts ensure his compliance with the Act.

a. The refund request letter.

As a result of the refund request letter, Mr. Simmons has obtained refunds, or has been assured of refunds, totalling $30,000,[1] as detailed below:

Recipient	Date	Amount	Status
NRSC	1/20/88	$2,000	Received
Cons. Victory Comm.	6/30/88	$5,000	Received
Sen. Connie Mack Comm.	6/14/89	$1,000	Received
Cong. Joe Barton Comm.	4/22/87	$1,000	Received
Cong. Joe Barton Comm.	7/13/88	$1,000	Received
Contran PAC	11/14/89	$5,000	Received
Kirkland & Ellis PAC	3/28/88	$5,000	Received
Conservatives Acting For Texans Comm.	2/18/88	$10,000	Will send check as soon as money available.
	Total	$30,000	

The effects of the refunds are threefold. First, the refund of the contributions from the Conservatives Acting for Texans Committee will remove doubts about compliance with § 441a-(a)(1)(c), which prohibits contributions in excess of $5,000 to certain committees. Second, the 1988 refunds (totalling $25,000) reduce significantly the amount attributable to Mr. Simmons for purposes of his individual spending limit for that year, although, standing alone, not sufficiently to comply with the $25,000

[1] All currently available cancelled checks and other documents recording the refunds are attached hereto as Exhibit D.

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individual limitation. Third, the refund of the 1989 $5,000 contribution from the Contran political action committee reduces Mr. Simmons' 1989 total contributions to a statutorily acceptable level. Mr. Simmons' efforts to obtain these refunds represent good faith gestures to adhere to the letter and spirit of the Act.

b. The reattribution request letter.

Additionally, Mr. Simmons' letter requesting reattribution of the contributing source would reconfigure his campaign contributions significantly. As the following table discloses, Mr. Simmons' contributions would be reduced by approximately $12,000:

Recipient	Date of Contribution	Harold C. Simmons	Annette Simmons
Friends of Denny Smith	5/31/88	$500	$500
Friends of Dick Armey	5/22/87	$500	$500
Friends of Dick Armey	5/22/87	$500	$500
Hatch Election Committee	4/21/87	$500	$500
John Bryant Campaign Committee	9/30/88	$500	$500
Dingell for Congress Committee	1/29/88	$500	$500
Williams Congress '88	6/30/88	$250	$250
Gore for President Committee	2/16/88	$500	$500
Danforth for Senate Committee	2/11/88	$250	$250
Friends for Slade Gorton 1988	7/18/88	$500	$500
Friends of Dick Lugar	1/20/88	$500	$500
Friends of Dick Lugar	1/20/88	$500	$500
Friends of Voinovich	2/22/88	$500	$500
Haig for President	5/10/88	$500	$500
Kent Hance for Senate Committee	12/30/87	$500	$500
Markey for Congress Committee	2/03/88	$500	$500
McEwen '88	6/09/87	$250	$250
Michel for Congress Committee	4/29/88	$500	$500

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Synar for Congress Committee	6/28/88	$250	$250
Ortiz for Congress	5/26/87	$250	$250
Pete Dawkins for Senate	2/08/88	$500	$500
Pete Dawkins for Senate	12/25/88	$250	$250
Pete DuPont for President	4/01/87	$500	$500
Texans for Beau Boulter	10/10/87	$500	$500
Texans for Beau Boulter	3/28/88	$500	$500
Steve Bartlett Congressional Campaign Committee	10/26/87	$437.50	$437.50
Steve Bartlett Congressional Campaign Committee	1/29/88	$500	$500
	TOTAL	$11,937.50	$11,937.50

c. Without a doubt, Mr. Simmons has adopted measures to assure full compliance with the Act.

The following tables incorporate Mr. Simmons' corrective measures, as described above, to provide an accurate overview of his contributions:

1988 Cycle Total Contributions:

Technical Total:	$58,426.00[2]
Less $25,000 in Refunds:	-25,000.00
Subtotal:	$33,426.00
Less $11,937.50 in reattributions	-11,937.50[3]
Actual Total:	$21,488.50

9304093388887

[2] The technical total in the Commission's "D" index attached to its letter dated August 17, 1990 is $64,626.00. Mr. Simmons, however, believes that there are errors in the Commission's records, which are discussed in greater detail in Section B, infra.

[3] After Mr. Simmons mailed the reattribution request letters, he learned from recipients' responses that due to reporting requirements imposed on candidates by 11 C.F.R. § 110(k)(3)(ii)(B) it would be impossible to comply with his request.

1989 Total Contributions:

Technical Total:	$26,250.00
Less $5,000 in Refunds:	-5,000.00
Actual Total:	$21,250.00

§ 441a(a)(1)(c) Total In 1988

Technical Total:	$10,000.00
Less $10,000 Refund:	-10,000.00
Actual Total:	$ 0.00

In sum, Mr. Simmons always intended to comply with the Act. Upon learning of potential violations, he immediately sought to remove any cloud of improper activity. Mr. Simmons' efforts are proving successful and, but for the impossibility of reattribution due to 11 C.F.R. § 110(k)(3)(ii)(B), he would be in compliance at this point. He has done everything he possibly can at this time to comply with the Act.

B. The Commission's Calculations Overstate Mr. Simmons' Contributions In The 1988 Election Cycle.

Mr. Simmons has examined the Commission's "D" index and has concluded that the Commission's total for the 1988 cycle ($64,626.00) misstates the extent of his political giving. First, the "D" index does not record a $1,000 refund received from the Pete Dupont for President campaign on November 25, 1987 (although it records the contribution), which is attached hereto as Exhibit E. Second, the $5,000 contribution to the WTW Reelection Committee properly reflects that it is a joint contribution from Mr. and Mrs. Simmons, and thus should be attributed equally to both. (That contribution currently is attributed solely to Mr. Simmons.) See

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Exhibit F attached hereto. Third, the $2,000 contribution to Friends of Dick Lugar dated January 20, 1988 also explicitly reflects that it is from Mr. and Mrs. Simmons for the primary and general elections. In other words, there were four $500 contributions (two from each contributor), not two $1,000 checks from Mr. Simmons. See Exhibit G attached hereto. Fourth, the $1,000 contribution to Californians for Pete Wilson and dated June 30, 1988 should be charged against the 1994 ceiling. A copy of the Commission's Selected List of Receipts & Expenditures for 1987-88, attached hereto as Exhibit H, shows that the contribution was for "Californians For Pete Wilson 1994." Finally, the May 19, 1989 contribution to Friends of Denny Smith, attached hereto as Exhibit I, should be counted toward the 1990 limitation. According to 11 C.F.R. § 110.1(b)(2)(ii), contributions which are not designated for a specific election are deemed to relate to the next future election, which in this instance is 1990.

In the interests of full disclosure and cooperation, Mr. Simmons has uncovered other contributions attributable to 1988. First, two $100 contributions to the Republican National Committee were made on December 8 and May 25, 1988. Second, a check totalling $100 payable to the Steve Bartlett Congressional Campaign Committee was written on March 27, 1987. Copies of all of these cancelled checks are attached hereto as Exhibit J.[4]

[4] Copies of all available cancelled checks which are relevant to this Matter Under Review are attached hereto as Exhibit K.

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Thus, the Commission's technical totals for the 1988 elections should be as set forth below:

Commission Technical Total:	$64,626.00
Plus RNC and Bartlett:	+ 300.00
Less DuPont refund:	- 1,000.00
Less $2,500 from WTW:	- 2,500.00
Less $1,000 from correction of Lugar entry:	- 1,000.00
Less $1,000 from correction of Wilson entry:	- 1,000.00
Less $1,000 from correction of Smith entry:	- 1,000.00
Actual Total:	$58,426.00

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SUMMARY AND CONCLUSION

This MUR alleges that Mr. Simmons committed three violations of the Act. First, the Commission contends that Mr. Simmons violated his individual contribution limitation for 1988. As discussed above, however, any unintentional overspending is being reduced through a vigorous effort to obtain refunds and Mr. Simmons' attempts to reattribute certain contributions. The success of his reattribution accomplishments is only frustrated by a technical provision of the Act's regulations. Second, the Commission states that Mr. Simmons made excessive contributions to a committee in 1988. As demonstrated above, however, the Conservatives Acting for Texans Committee has provided assurance that it will refund both 1988 contributions as soon as funds become available. Third, the Commission contends that Mr. Simmons exceeded the 1989 ceiling for individuals. Again, however, Mr.

Simmons has acted to correct any violation. In this case, the refund from the Contran political action committee removes any possible concerns about Mr. Simmons' desire to adhere to the Act.

Mr. Simmons may have inadvertently and technically exceeded applicable limitations. His intentions, however, were always to comply with the requirements of the Act. That intent is readily witnessed by Mr. Simmons' rapid efforts to correct any misunderstanding. Mr. Simmons' letters, and follow-up actions, are resulting in his adherence to the letter and spirit of the Act. In his continuing spirit of cooperation, Mr. Simmons respectfully requests that the conciliation phase of this MUR be commenced forthwith.

9304093389 1

Respectfully submitted,

HAROLD C. SIMMONS

Dated: 9/24/90

By: _____
William B. Singer
One of His Attorneys

93040933392

(A)

UNITED STATES OF AMERICA
BEFORE
THE FEDERAL ELECTION COMMISSION

In Re Matter Under Review No. 3104 Harold C. Simmons, Respondent	AFFIDAVIT OF HAROLD C. SIMMONS

I, Harold C. Simmons, being first duly sworn, hereby depose and state as follows:

1. Unless otherwise noted, the facts set forth herein are within my personal knowledge and, if called as a witness or in some other manner to testify under oath, I can competently testify with respect thereto.

2. Until a story regarding campaign contributions appeared in the Los Angeles Times on April 18, 1990 I believed that my political contributions fully complied with the requirements of the Federal Election Campaign Act.

3. As soon as I learned of the potential compliance problem under the Act, letters were sent to contributees for the 1988 election cycle requesting either refunds or reattribution of the contributing source (i.e. Harold and Annette Simmons).

4. Since those letters were mailed, I have recaptured, or have commitments of refunds of, $20,000.

5. To the extent that my total contributions attributable to 1988 exceeded applicable limitations, such overages were

9304093393

entirely unintentional. Any excess was neither willful nor intentional.

FURTHER AFFIANT SAYETH NOT.

Harold C. Simmons

Sworn to and subscribed
before me this ____ day
of September, 1990

Notary Public in and for
Dallas County, Texas

My commission expires: _____

93040933894

(B)

ATTACHMENT A

(Letter requesting refunds of contributions)

[HCS Letterhead]

[Name and Address of PAC/Candidate]

Dear _____:

It has recently come to my attention that Federal Election Commission records reflect federal campaign contributions on my behalf for 1988 in excess of the applicable $25,000 annual limitation. This situation is the result of two factors, neither of which I was aware of at the time the contributions were made.

First, I was unaware that certain contributions actually made in 1987 and 1989 to candidates standing for election in 1988 would be counted toward my 1988 limitation under FEC regulations. Second, I believed that certain contributions were to be recorded as joint contributions on behalf of my wife and me, but apparently not all records properly reflect this. The inclusion of 1987 and 1989 contributions in 1988 and the attribution of the entire amount of joint contributions to me alone had the effect of increasing my total contribution level beyond that which I had intended.

As it has always been my intention to comply fully with applicable contribution limitations, I wish to correct this situation. Accordingly, I am writing to request that my contribution of [$_____] on [date] be refunded to me. I apologize for any inconvenience caused by my request, and I appreciate your attention to this matter.

Sincerely,

Harold Simmons

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ATTACHMENT B

(Letter requesting redesigation of contributions)

[HCS Letterhead]

[Name and Address of PAC/Candidate]

Dear _____:

It has recently come to my attention that Federal Election Commission records reflect federal campaign contributions on my behalf for 1988 in excess of the applicable $25,000 annual limitation. This situation is the result of two factors, neither of which I was aware of at the time the contributions were made.

First, I was unaware that certain contributions actually made in 1987 and 1989 to candidates standing for election in 1988 would be counted toward my 1988 limitation under FEC regulations. Second, I believed that certain contributions were to be recorded as joint contributions on behalf of my wife and me, but apparently not all records properly reflect this. The inclusion of 1987 and 1989 contributions in 1988 and the attribution of the entire amount of joint contributions to me alone had the effect of increasing my total contribution level beyond that which I had intended.

As it has always been my intention to comply fully with applicable contribution limitations, I wish to correct this situation. Accordingly, I am writing to request that your records be updated to properly reflect the contribution of [$_____] on [date] as a joint contribution by my wife (Annette Simmons) and me. I apologize for any inconvenience caused by my request, and I appreciate your attention to this matter.

Sincerely,

Harold Simmons

9304093338896

(C)

RECIPIENTS OF SIMMONS LETTERS

REFUND:

1. Conservative Victory Commission
2. Conservatives Acting for Texans
3. Kirkland & Ellis PAC
4. National Republican Senatorial Committee
5. Congressman Joe Barton Committee
6. Jeffords-Mack Victory Committee (refund requested from Mack only)
7. Friends of Connie Mack

REDESIGNATION:

1. Friends of Denny Smith
2. Friends of Dick Armey
3. Hatch Election Committee
4. John Bryant Campaign Committee
5. Dingell for Congress Committee
6. Williams Congress '88
7. Gore for President Committee
8. Danforth For Senate Committee
9. Friends for Slade Gorton 1988
10. Friends of Dick Lugar
11. Friends of Voinovich
12. Haig for President
13. Kent Hance for Senate Committee
14. Markey for Congress Committee
15. McEwen '88
16. Michel for Congress Committee

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17. Synar for Congress Committee

18. Ortiz for Congress

19. Pete Dawkins for Senate

20. Pete DuPont for President

21. Texans for Beau Boulter

22. Steve Bartlett Congressional Campaign Committee

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D

CAT/PAC

Conservatives Acting Together / Political Action Committee

Richard H. Collins
Chairman

August 20, 1990

Mr. Harold Simmons
5430 LBJ Freeway
Dallas, Texas 75240-2697

Dear Harold:

It has been brought to our attention that you gave a contribution of $5000 on February 18, 1988 and another $5000 on August 12, 1988 and due to an oversight on our part, we should not have accepted the second contribution. In order to avoid any appearance of impropriety, we will refund the full $10,000 and will do so as money comes available in the PAC's fund.

Again, I apologize for the oversight on our part.

Sincerely,

Fran Sauls

Fran Sauls
Treasurer

930409338999

2929 Carlisle, Suite 222 Dallas, Texas 75204 (214) 871-9300

1409

KIRKLAND & ELLIS PAC 11-86
c/o William S. Singer
200 East Randolph Dr., Ste. 5900
Chicago, Illinois 60601

May 18, 1990

2-78
710

PAY TO THE ORDER OF Harold Simmons $ 5,000.00

Five Thousand and 00/100---------- DOLLARS

CHICAGO BANK OF COMMERCE
Chicago, Illinois 60601

FOR Refund

⑈001409⑈ ⑆071000754⑆ ⑈00 7871 4⑈ ⑈0000500000⑈

For deposit only
Harold Simmons
Acct. #30-7328-5

930409339940

CONSERVATIVE VICTORY COMMITTEE
PH. 703-684-6903
111 S. COLUMBUS STREET
ALEXANDRIA, VA. 22314

1ST AMERICAN BANK
FIRST AMERICAN BANK OF VIRGINIA
MCLEAN, VIRGINIA 22101

1447

Sept 18 1990

56-174
560 025

PAY five thousand and no/100---------- DOLLARS $ 5000.00

TO THE ORDER OF Harold Simmons

Jeanette R Bosley
Lyn Shaw

⑈00001447⑈ ⑆056004241⑆ 0057384 1⑈

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.

CONSERVATIVE VICTORY COMMITTEE

DELUXE - FORM BVCP-3 V-2

DATE	DESCRIPTION	AMOUNT
9/18/90	Contribution refund from 1988	$5000.00
	4010F	

930409339 01

9304093902

THE CONGRESSMAN JOE BARTON
COMMITTEE CAMPAIGN 1990
P. O. BOX 1444 214-875-0888
ENNIS, TX 75120

696

May 29 19 90

PAY TO THE ORDER OF Harold Simmons $ 2000.00

Two thousand and °°/100 DOLLARS

NCNB

Refund - In excess of			
$25,000 limit			
	April 22 1987	1000	00
	July 13 1988	1000	00

Judy Markley

⑈000576⑈ ⑆111901758⑆ ⑈0120 7⑈

NATIONAL REPUBLICAN
SENATORIAL COMMITTEE
425 SECOND STREET, NE.
WASHINGTON, DC 20002

01-SIMMONSH

SIGNET BANK
VIENNA, VA
56-400/560

41753

DATE	CONTROL NO.	AMOUNT
06/05/90	041753	*****$2,000.00

PAY TO THE ORDER OF ******2,000 DOLLARS AND 00 CENTS

HAROLD SIMMONS
SUITE 1700
5430 LBJ FREEWAY
DALLAS TX 75240

James L. Hayes
Joyce Beard

⑈00041753⑈ ⑆056004089⑆ 651-7172927⑈

930409339003

FRIENDS OF CONNIE MACK
PRIMARY ACCOUNT
1211 N. WESTSHORE BLVD., SUITE 300
TAMPA, FLORIDA 33607

2375

June 1, 19 90

PAY TO THE ORDER OF Harold Simmons $ 1,000.00

ONE THOUSAND AND 00/100----------DOLLARS

FIRST FLORIDA

First Florida Bank, N.A.
Hyde Park Office
401 W. Platt St.
Tampa, Florida 33606

7000

⑈002375⑈ ⑆063100264⑆ 4008703938

93390 4

93004

CONTRAN CORPORATION POLITICAL
ACTION COMMITTEE
5430 LBJ FRWY., STE. 1700
DALLAS, TX 75240

130

9-21 1990

PAY TO THE ORDER OF Howard L Simmons $ 500.00

Five Thousand & No/100 DOLLARS

MBank

Refund 1989
Contribution

CONTRAN CORPORATION POLITICAL
ACTION COMMITTEE

E L Anderson

⑈000130⑈ ⑆111000614⑆ 010000774⑈

930409 330905

9 3 0 4 0 9 3 3 9 0 6

7

DEPOSIT TICK

DATE May 25 19 93

Checks and other items are received for deposit subject to the provisions of the Uniform Commercial Code or any applicable collection agreement

88-687
1110

M Bank Lincoln Centre

HAROLD SIMMONS

CURRENCY		
COIN		
CHECKS		1,000.00
		31.58
		21.90
		82.60
		44.00
TOTAL FROM OTHER SIDE		138.38
TOTAL		1,995.67

IF OTHER SIDE FOR ADDITIONAL LISTING

93040933907

9 3 0 4 0 9 3 3 9 0 8

6430 LBJ FWY., SUITE 1700
DALLAS, TEXAS 75240

April 20 1987

PAY TO THE ORDER OF WTW Reelection Committee $ 5,000.00

Five thousand dollars & no/100---------- DOLLARS

MBank Lincoln Centre
6688 LBJ Freeway, Suite 160
Dallas, Texas 75240

FOR Harold & Annette Simmons

Harold Simmons

⑈0000500000⑈

⑆930409339⑆09

9 3 0 4 0 9 3 3 9 1 0

9

HAROLD D SIMMONS

DALLAS, TEXAS 75240

901

January 4 1988

PAY TO THE ORDER OF Lugar for Senate Committee $ 2,000.00

Two thousand dollars & no/100---------- DOLLARS

MBank Lincoln Centre

8400 LBJ Freeway
Dallas, Texas 75240

$1,000 Primary, $1,000 General

FOR Harold & Annette Simmons

Contribution

Harold Simmons

#0000200000#

#30409339111#

9 3 0 4 0 9 3 3 9 1 2

FEDERAL ELECTION COMMISSION

DATE 28NOV90

SELECTED LIST OF RECEIPTS & EXPENDITURES (G) (87-88)
SECTION I - INDIVIDUAL CONTRIBUTIONS

PAGE 1000

CONTRIBUTOR/LENDER/TRANSFERER REPORTING ENTITY MICROFILM LOCATION	STREET ADDRESS TRANSACTION TYPE	CITY	STATE ZIP REPORT TYPE	TYPE OF FILER DATE	ELECTION	AMOUNT
SIMMONS, HAROLD C CONTRAN CORPORATION POLITICAL ACTION COMMITTEE (COMPAC) 87FEC/473/4274 #067355 CONTRIBUTION		DALLAS CONTRAN CORPORATION	TX 75225 MID-YEAR REPORT	15JUL87	PRIMARY	5,000
SIMMONS, HAROLD MR ALBERT GORE JR FOR PRESIDENT COMMITTEE INC 88FEC/511/5051 #262394 CONTRIBUTION		DALLAS	TX 75240 MARCH MONTHLY	16FEB88	PRIMARY	1,000
SIMMONS, HAROLD MR CALIFORNIANS FOR PETE WILSON 1994 88SEN/011/1205 #417525 CONTRIBUTION		DALLAS BUS EXECUTIVE	TX 75240 JULY QUARTERLY	30JUN88	GENERAL	1,000
SIMMONS, HAROLD MR CAMPAIGN AMERICA 87FEC/460/5396 #008895 CONTRIBUTION		DALLAS	TX 75234 FEBRUARY MONTHLY	29JAN87	PRIMARY	2,000
SIMMONS, HAROLD MR CONGRESSMAN JOE BARTON COMMITTEE 87HSE/356/3748 #155479 CONTRIBUTION		DALLAS CONTRAN CORP	TX 75234 MID-YEAR REPORT	22JUN87	PRIMARY	1,000
SIMMONS, HAROLD MR CONGRESSMAN JOE BARTON COMMITTEE 88HSE/362/0784 #614249 CONTRIBUTION		DALLAS CONTRAN CORP	TX 75240 OCTOBER QUARTERLY	15JUL88	GENERAL	1,000
SIMMONS, HAROLD MR DANFORTH FOR SENATE COMMITTEE 88SEN/008/1307 #359517 CONTRIBUTION		DALLAS CONTRAN GROUP	TX 75240 APRIL QUARTERLY	11FEB88	PRIMARY	500
SIMMONS, HAROLD MR FREE CONGRESS PAC (FORMERLY: CMTE FOR THE SURVIVAL OF A FREE CONGRESS) 87FEC/465/4268 #016445 CONTRIBUTION		DALLAS CONTRAN CORPORATION	TX 75244 APRIL MONTHLY	25MAR87	PRIMARY	1,000
SIMMONS, HAROLD MR FRIENDS FOR SLADE GORTON 1988 88SEN/016/0102 #485258 CONTRIBUTION		DALLAS CONTRAN CORP	TX 75240 PRE-PRIMARY	18JUL88	PRIMARY	1,000
SIMMONS, HAROLD MR FRIENDS OF DICK LUGAR 88SEN/006/2242 #301416 CONTRIBUTION X		DALLAS CONTRAN CORPORATION	TX 75240 APRIL QUARTERLY	20JAN88	PRIMARY	1,000
SIMMONS, HAROLD MR FRIENDS OF DICK LUGAR 88SEN/006/2242 #301417 CONTRIBUTION X		DALLAS CONTRAN CORPORATION	TX 75240 APRIL QUARTERLY	20JAN88	GENERAL	1,000
SIMMONS, HAROLD MR FRIENDS OF PHIL GRAMM 88SEN/014/2008 #443/14 CONTRIBUTION		DALLAS INVESTMENTS	TX 75234 MID-YEAR REPORT	23JAN88	GENERAL	1,0

03.19.90 01:48 PM

P08

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A4

TEXAS 75240

PAY TO THE ORDER OF Friends of Danny Smith May 5 19 89 $ 1,000.00

One thousand dollars & no/100---------- DOLLARS

MBank

FOR _____ Harold Simmons

"0000 100000

9304009339915

9 3 0 4 0 9 3 3 9 1 6

4.

1671

[redacted] SIMMONS

[redacted] PRWY., STE. 1720
DALLAS, TEXAS 75240

DEC. [redacted] 19[redacted]

PAY TO THE ORDER OF Republican National Committee $ 100.00

One hundred dollars & no/100---------- DOLLARS

MBank

FOR _____

Harold Simmons

⑈00000 10000⑈

⑆930400933917

5430 [illegible] FRWY., STE. 1700
D: [illegible] 3214

May 25 19 88

PAY TO THE ORDER OF The Republican National Committee $ 100.00

One hundred dollars & no/100---------- DOLLARS

MBank Lincoln Centre
5430 LBJ Freeway
Dallas, Texas 75240

FOR 1988 Membership

Harold Simmons

#00000 10000#

930409339918

8430 LBJ FWY., SUITE 17[illegible]
DALLAS, TEXAS 7524

BRIGHT HAND

March 27 19 87

PAY TO THE ORDER OF Steve [illegible] ssional Campaign Committee $ 100.00

One hundred dollars & no/100 DOLLARS

RECEIVED
MAR 30 1987

MBank Lincoln Centre
8400 LBJ Freeway, Suite 100
Dallas, Texas 75240
State Ballot
Congressional Campaign Committee

FOR

Harold Summers

⑈00000 10000⑈

930409339919

9304093392O

DEPOSIT TICKET

DATE Nov. 25 19 87

Checks and other items are received for collection in accordance with the Uniform Commercial Code or any applicable collection agreement

31-462
1110

MBank Lincoln Centre
5470 LBJ Freeway, Suite 100
Dallas, Texas 75240

HAROLD SIMMONS

CURRENCY		
COIN		
CHECKS	Little Cuyo	1,000. 00
LIST CHECKS SINGLY	Cantrell	31. 83
	Cantrell	81. 90
	Cantrell	8 2 60
	Cantrell	46. 00
TOTAL FROM OTHER SIDE		138. 38
TOTAL		1,393. 67

NOTE: USE SIDE FOR ADDITIONAL LISTING

930409339921

5430 LBJ FWY., SUITE 17
DALLAS, TEXAS 7524

March 2 87

PAY TO THE ORDER OF Senator Lloyd Bentsen Election Committee $ 2,000.00

Two thousand dollars & no/100---------- DOLLARS

MBank Lincoln Centre
5430 LBJ Freeway, Suite 100
Dallas, Texas 75240

FOR Contribution from Harold & Annette Simmons

Harold L. Simmons

#0000200000#

930409339922

DALLAS, TEXAS 75240

March 19 10 87

PAY TO THE ORDER OF Pete DuPont for President Campaign $ 1,000.00

One thousand dollars & no/100---------- DOLLARS

MBank Lincoln Centre

FOR contribution

Harold Simmons

#0000100000#

930409339923

8430 LBJ FWY., SUITE 170
DALLAS, TEXAS 752

April 13 19 87

PAY TO THE ORDER OF Dole Exploratory Committee $ 2,000.00

Two thousand dollars & no/100---------- DOLLARS

MBank Lincoln Centre 01 MSTX

FOR Contribution from Harold & Annette Simmons Harold C Simmons

"0000200000"

930409339924

PAY TO THE ORDER OF Hatch Election Committee

April 13 19 87

$ 2,000.00

Two thousand dollars & no/100---------- DOLLARS

MBank Lincoln Centre

FOR

Harold Simmons

⑈0000 200000⑈

⑆3040933925⑆

HAROLD SIMMONS

5430 LBJ FWY., SUITE 1
DALLAS, TEXAS 7

A 2 U

April 20 19 87

PAY TO THE ORDER OF Congressman Joe Barton Committee $ 1,000.00

One thousand dollars & no/100---------- DOLLARS

MBank Lincoln Centre

FOR

Harold Simmons

⑈0000 1000⑈

⑆930409339926

9430 LBJ FWY., SUITE 1700
DALLAS, TEXAS 75240

April 20 1987

PAY TO THE ORDER OF WTW Reelection Committee $ 5,000.00

Five thousand dollars & no/100---------- DOLLARS

MBank Lincoln Centre
9430 LBJ Freeway, Suite 100
Dallas, Texas 75240

FOR Harold & Annette Simmons

Harold Simmons

⑈0000500000⑈

⑆930409339927

DALLAS, TEXAS 75240

April 22 19 87

PAY TO THE ORDER OF Hecht Re-election Committee $ 4,000.00

Four thousand dollars & no/100---PAID-NEXT-BANK,-NA-- --DOLLARS

MBank Lincoln Centre
8400 LBJ Freeway, Suite 100
Dallas, Texas 75243

FOR Primary General Election from Harold & Annette Simmons

Harold Simmons

⑈0000400000⑈

⑆930409339928⑆

8430 LBJ FWY., SUITE 1150
DALLAS, TEXAS 75240

5/27 19 87

PAY TO THE ORDER OF Friends of Dick Armey $ 2,000.00

Two thousand and no/100 DOLLARS

MBank Lincoln Centre
8430 LBJ Freeway, Suite 150
Dallas, Texas 75240

FOR Contribution

Harold Simmons

"0000200000"

930409339229

DALLAS, TEXAS 75240

PAY TO THE ORDER OF Ortiz for Congress

5/26 19 87

$ 500.00

Five hundred and no/100 DOLLARS

MBank Lincoln Centre

FOR Donation

Harold Simmons

⑈00000 50000

⑆930409339330

8430 LBJ FWY., SUITE 1700
DALLAS, TEXAS 75243

8-88/1110

PAY TO THE ORDER OF McKeown for Congress — 5/26 19 87

$ 500.00

Five hundred and no/100 DOLLARS

MBank Lincoln Centre
8400 LBJ Freeway, Suite 100
Dallas, Texas 75243

FOR Donation

Harold Simmons

⑈00000 50000⑈

⑆930409333931

DALLAS, TEXAS 75219

September 28 87

PAY TO THE ORDER OF Congressman [redacted] Bentsen $ 1,000.00

One thousand dollars & no/100---------- DOLLARS

MBank Lincoln Centre
5400 LBJ Freeway
Dallas, Texas 75240

FOR _____

Henri Simmons

⑈0000 100000⑈

⑆930409339932⑆

PAY TO THE ORDER OF George Bush for President $ 500.00

Five hundred dollars & no/100---------- DOLLARS

MBank Lincoln Centre
8400 LBJ Freeway
Dallas, Texas 75243

FOR

Gerald W. Simmons

#00000 50000#

9304093339333

DEPOSIT TICKET

DATE 11-5 19 87

Checks and other items are received for deposit subject to the provisions of the Uniform Commercial Code or any applicable collection agreement.

32-202
1110

CURRENCY			
COIN			
CHECKS	Valley	625	40
	Total Electrical Supply	1	00
	Cantex	20	00
	Cantex	10	26
	Cantex	25	82
	Cantex	48	14
TOTAL FROM OTHER SIDE		12	04
TOTAL		1,864	26

SEE OTHER SIDE FOR ADDITIONAL LISTING

MBank Lincoln Centre

HAROLD SIMMONS

MBank
LINCOLN CENTRAL
NOV 5 1987
N.A.

.26

9304093393934

HAROLD SIMMONS

[redacted]
[redacted], TEXAS 75240

Oct. 12 19 87

PAY TO THE ORDER OF Friends of David K. Karnes $ 1,000.00

One thousand dollars & no/100---------- DOLLARS

MBank Lincoln Centre
[redacted]

FOR _____

Harold Simmons

#0000 100000

930409339335

DATE Dec. 3 19 87

Checks and other items are received for deposit subject to the provisions of the Uniform Commercial Code or any applicable collection agreement.

M Bank Lincoln Centre

HAROLD SIMMONS

CURRENCY		
COIN		
CHECKS	Paul Trib	833.04
TOTAL FROM OTHER SIDE		
TOTAL		1,458.04

USE OTHER SIDE FOR ADDITIONAL LISTING

14

930409339336

TEXAS 75240

January 4 1988

PAY TO THE ORDER OF Lugar for Senate Committee $ 2,000.00

Two thousand dollars & no/100---------- DOLLARS

MBank Lincoln Centre

$1,000 Primary, $1,000 General

FOR Harold & Annette Simmons

Contribution

Harold Simmons

#0000200000#

9300409339937

8400 LBJ FRWY., SUITE 1700
[redacted]

Jan 21 19 88

PAY TO THE ORDER OF Republican Senatorial Inner Circle $ 2,000.00

Two thousand dollars & no/100---------- DOLLARS

MBank Lincoln Centre
8400 LBJ Freeway
Dallas, Texas 75240

FOR Mr. & Mrs. Harold Simmons Membership for 1988

Harold C. Simmons

#0000 200000#

930400933938

8430 LBJ FRWY., SUITE 1700
DALLAS, TEXAS 75240

Jan. 27 19 88

PAY TO THE ORDER OF Steve Bartlett Congressional Campaign Committee $ 1,000.00

One thousand dollars & no/100 DOLLARS

MBank Lincoln Centre
8400 LBJ Freeway
Dallas, Texas 75243

FOR

David L. Simmons

#0000100000#

9304009339339

[redacted] PKWY., SUITE 1700
[redacted], TEXAS 75240

January 29, 88

PAY TO THE ORDER OF John D. Dingell for Congress Committee $ 1,000.00

One thousand dollars & no/100---------- DOLLARS

MBank Lincoln Centre
[redacted] LBJ Freeway
Dallas, Texas 75240

FOR _____

[redacted]

⑈0000100000⑈

930409339940

841

SIMMONS

8430 LBJ FRWY., SUITE 1700
DALLAS, TEXAS 75240

Jan. 15 19 88

PAY TO THE ORDER OF Ed Markey for Congress Committee $ 500.00

Five hundred dollars & no/100---------- DOLLARS

MBank Lincoln Centre
8400 LBJ Freeway
Dallas, Texas 75240

FOR Contribution

Harold W. Simmons

"0000050000"

930400933941

8430 LBJ FRWY., SUITE 1700
LAS, TEXAS 75240

Jan. 22 19 88

PAY TO THE ORDER OF Ed Markey for Congress Committee $ 500.00

Five hundred dollars & no/100---------- DOLLARS

MBank Lincoln Centre
8430 LBJ Freeway
Dallas, Texas 75240

FOR _____

Diana L. Lorraine

⑈00000 50000⑈

⑆30040933942⑆

8430 LB ...WY., SUITE 1700
DAL... TEXAS 75240

...RUARY 29 19 88

PAY TO THE ORDER OF Pete Dawkins for Senate $ 1,000.00

One thousand dollars & no/100---------- DOLLARS

MBank Lincoln Centre
8400 LBJ Freeway
Dallas, Texas 75240

FOR File

Harold Simmons

"0000100000"

930400933943

9400 LBJ FRWY., SUITE 1700
D[redacted], TEXAS 75240

January 12, 19 88

PAY TO THE ORDER OF Danforth for Senate $ 500.00

Five hundred dollars & no/100---------- DOLLARS

MBank Lincoln Centre
9400 LBJ Freeway
Dallas, Texas 75240

FOR _____

Harold Simmons

⑈00000 50000⑈

⑆930400933944⑆

[redacted] TEXAS 75219

January 29 19 88

PAY TO THE ORDER OF Gore for President Committee $ 1,000.00

One thousand dollars & no/100---------- DOLLARS

MBank Lincoln Centre
[redacted] LBJ Freeway
Dallas, Texas 75240

FOR _____

Harold Simmons

⑈0000 600000⑈

9304009339945

5430 LBJ FRWY., STE. 1700
DALLAS, TEXAS 75240

Feb. 18 19 88

PAY TO THE ORDER OF CATPAC $ 5,000.00

Five thousand dollars & no/100---------- DOLLARS

MBank Lincoln Centre
5430 LBJ Freeway
Dallas, Texas 75240

FOR _____

"0000500000"

930409339946

DALLAS, TEXAS 75240

Feb. 1 19 88

PAY TO THE ORDER OF Voinovich for Senate Committee $ 1,000.00

One thousand dollars & no/100---------- DOLLAR

MBank Lincoln Centre
[illegible]

FOR _____ Harold Simmons

/0000100000

9300409339947

.AS FRWY., STE. 1700
.LAS, TEXAS 75240

March 1 19 88

PAY TO THE ORDER OF Rick Montoya for U.S. Senate Committee $ 2,000.00--

Two Thousand and no/100 - DOLLARS

MBank Lincoln Centre
[illegible]

FOR $1,000--Annette Simmons

Harold Simmons

⑈0000200000⑈

⑆930409339948⑆

[redacted] LBJ FRWY., STE. 1700
[redacted], TEXAS 75240

arch 24 19 88

PAY TO THE ORDER OF Texans for Beau Boulter $ 1,000.00

One thousand dollars & no/100---------- DOLLARS

MBank Lincoln Centre
[redacted] LBJ Freeway
[redacted], Texas 75240

Harold Simmons

FOR _____

⑈0000 100000⑈

⑆930409339949

5430 LBJ FRWY., STE. 1700
LAB. TEXAS 75240

March 25 19 88

PAY TO THE ORDER OF WSS PAC $ 5,000.00

Five thousand dollars & no/100---------- DOLLARS

MBank Lincoln Centre
5430 LBJ Freeway
Dallas, Texas 75240

FOR _____

Harold Simmons

⑈0000500000⑈

⑆930400933950

1111

AS, TEXAS 75240

April 18 19 88

PAY TO THE ORDER OF Michel for Congress $ 1,000.00

One thousand dollars & no/100---------- DOLLARS

MBank Lincoln Centre
8400 LBJ Freeway
Dallas, Texas 75240

FOR _____

Harold Simmons

"0000100000"

9304093395 1

5430 LBJ FRWY., STE. 1700
[redacted], TEXAS 75240

April 29 19 88

PAY TO THE ORDER OF Haig for President $ 1,000.00

One thousand dollars & no/100---------- DOLLARS

MBank Lincoln Centre
5430 LBJ Freeway
Dallas, Texas 75240

FOR _____

Harold Simmons

"0000100000C"

930400933952

8400 LBJ FRWY., STE. 1700
DALLAS, TEXAS 75240

May 31 19 88

PAY TO THE ORDER OF Jefferds-Mack Victory Committee $ 2,000.00

Two thousand dollars & no/100---------- DOLLAR

MBank Lincoln Centre
8400 LBJ Freeway
Dallas, Texas 75240

FOR

Harold Simmons

⑈0000 200000⑈

⑆930409339553⑆

[redacted] SJ FRWY., STE. 1700
[redacted] AS, TEXAS 75240

May 26 19 88

PAY TO THE ORDER OF Friends of Denny Smith $ 1,000.00

One thousand dollars & no/100---------- DOLLARS

MBank Lincoln Centre
[redacted] LBJ Freeway
[redacted], Texas 75240

[redacted]

FOR [redacted]

Harold Simmons

"0000100000"

9304093395 4

6430 LBJ FRWY., STE. 1700
DA[redacted] TEXAS 75240

May 24 19 88

PAY TO THE ORDER OF George Bush for President $ 500.00

Five hundred dollars & no/100---------- DOLLARS

MBank Lincoln Centre
6430 LBJ Freeway
Dallas, Texas 75240

FOR _____

Harold Simmons

"00000 50000"

9304093395 5

, TEXAS 75240

June 15 19 88

PAY TO THE ORDER OF Synar for Congress Committee $ 500.00

Five hundred dollars & no/100---------- DOLLARS

MBank Lincoln Centre
8400 LBJ Freeway
Dallas, Texas 75240

FOR _____

Harold Simmons

"00000 50000"

9304093399556

DALLAS, TEXAS 75240

June 23 19 88

PAY TO THE ORDER OF Conservative Victory Committee $ 5,000.00

Five thousand dollars & no/100---------- DOLLARS

MBank Lincoln Centre

Harold Simmons

FOR

"0000500000"

930409339957

5410 LBJ FRWY., STE. 1100
DALLAS, TEXAS 75240

June 17 19 88

PAY TO THE ORDER OF Williams for Congress '88 $ 500.00

Five hundred dollars & no/100---------- DOLLARS

MBank Lincoln Centre
5400 LBJ Freeway
Dallas, Texas 75240

FOR

Harold Simmons

⑈00000 50000⑈

⑆930400933 9958⑆

[redacted] TEXAS 75240

July 13 19 88

PAY TO THE ORDER OF Congressman Joe Barton Committee $ 1,000.00

One thousand dollars & no/100---------- DOLLARS

MBank Lincoln Centre

Harold Simmons

FOR _____

"0000 600000"

930400933959

5430 LBJ FRWY., STE. 1700
DALLAS, TEXAS 75240

June 30 19 88

PAY TO THE ORDER OF Friends of Slade Gorton $ 1,000.00

One thousand dollars & no/100---------- DOLLARS

MBank Lincoln Centre
5430 LBJ Freeway
Dallas, Texas 75240

FOR _____

[signature]

"0000100000"

9304093399600

DALLAS, TEXAS 75240

July 15 19 88

PAY TO THE ORDER OF People for John Heinz Committee $ 2,000.00

Two thousand dollars & no/100---------- DOLLARS

MBank Lincoln Centre
8400 LBJ Freeway
Dallas, Texas 75243

FOR Harold & Annette Simmons

Harold Simmons

"0000 200000"

930409339961

5430 LBJ FRWY., STE. 1700
[redacted] TEXAS 75240

[redacted] August 12 1988

PAY TO THE ORDER OF CAT/PAC $ 5,000.00

Five thousand dollars & no/100---------- DOLLARS

MBank
[redacted]

FOR _____

[redacted] Harold J. Simmons

"0000500000"

930409339962

[illegible] RAMP FRWY., STE. 1700
[illegible], TEXAS 75240

September 26, 1988

PAY TO THE ORDER OF John Bryant Campaign $ 1,000.00

One thousand dollars & no/100---------- DOLLARS

MBank

FOR _____

Harold Simmons

⑈0000100000⑈

⑆930409339963⑆

[redacted] LBJ FRWY., STE. 1700
[redacted], TEXAS 75240

Dec. 20 19 88

PAY TO THE ORDER OF Pete Dawkins for U. S. Senate $ 500.00

Five hundred dollars & no/100 DOLLAR

MBank
[redacted]

FOR

Harold Simmons

/00000 50000

9304093399 64

PAY TO THE ORDER OF Friends of [redacted]y Smith

May 5 19 89

$ 1,000.01

One thousand dollars & no/100----------

DOLL

MBank

FOR _____

Harold Simmons

"0000 10000

930409339965

June 14 1989

PAY TO THE ORDER OF Friends of Connie Mack $ 1,000.00

One thousand dollars & no/100---------- DOLLA

MBank

FOR

Harold Simmons

⑈0C00100000⑈

9304093399666

DALLAS, TEXAS 75240 [illegible]

March 30 19 89

PAY TO THE ORDER OF Republican S[illegible]orial Inner Circle $ 1,000.00

One thousand dollars &no/100---------- DOLLAR

MBank

Uptown Grove Office 8400 LBJ Frwy. Dallas, Texas 75240 [illegible]

FOR [illegible]

[illegible]

⑈0000100000

930409339967

PAY TO THE ORDER OF Democratic [illegible]terial Campaign

May 24 19 89

$ 15,000.0

Fifteen thousand dollars & no/100---------- DOLLA

Mbank

FOR

Harold Simmons

'000 i 500000

930409339968

Nov. 13 1984

PAY TO THE ORDER OF Contran Political Action Committee $ $5,000.00

Five thousand dollars & no/100---------- DOLLARS

MBank

Lemmon Avenue Office 3400 Lemmon Ave. Dallas, Texas 75204

FOR _____

Harold Simmons

⑈0000500000⑈

⑆930400933969⑆

DALLAS, TEXAS 75240

PAY TO THE ORDER OF Small Biz PAC

Nov. 14 1992

$ 5000.00

Five thousand dollars & no/100---------- DOLLARS

MBank

FOR

Harold Simmons

#0000500000C

930409339970

1671

LD SIMMONS

DALLAS, TEXAS 75240

DEC. 27 19 89 46

PAY TO THE ORDER OF Republican National Committee $ 100.00

One hundred dollars & no/100 DOLLARS

MBank

FOR

Harold Simmons

#00000 10000#

930409339971

[redacted] 20-10
[redacted] 23 19 88

PAY TO THE ORDER OF The Republican National Committee $ 100.00

One hundred dollars & no/100---------- DOLLARS

MBank Lincoln Centre

FOR 1988 Membership

Harold Simmons

⑈00000100000⑈

⑆930409339972

[illegible]

5400 LBJ FWY., SUITE 170
DALLAS, TEXAS 75240

PRIGHT VC

March 27 19 87

PAY TO THE ORDER OF Steve [illegible] Congressional Campaign Committee $ 100.00

One hundred dollars & no/100 DOLLARS

RECEIVED
MAR 30 1987

MBank Lincoln Centre
5400 LBJ Freeway, Suite 170
Dallas, Texas 75240
Steve Bartlett
Congressional Campaign Committee

FOR

Harold L. Simmons

⑈00000 10000⑈

930409339973

LAW OFFICES
WUNDER, RYAN, CANNON & THELEN
1615 L STREET, N.W., SUITE 650
WASHINGTON, D. C. 20036
(202) 659-3005
FACSIMILE: (202) 659-3010

November 30, 1990

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 NOV 30 AM 3:49

Lawrence M. Noble, Esq.
General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

RE: MUR 3161: Henry Kravis Response

Attn: Francis Hagan

Dear Ms. Hagan:

On November 26, 1990 we received a copy of the complaint filed by Common Cause in MUR 3161 relating to Mr. Henry Kravis ("Respondent"). This response is submitted to the Commission pursuant to 2 U.S.C. §437g(a)(1) on behalf of the Respondent. By this document, the Respondent requests that the Commission take no further action relative to the alledged violations contained in the complaint.

This complaint is based on the same factual situation as presented in MUR 3026, namely that Respondent has exceeded his aggregate calendar year contribution limit as set forth at 2 U.S.C. §441a(a)(3). In response to this matter, Respondent relies upon and fully incorporates herein the response submitted to the Commission on September 21, 1990 in MUR 3104. (Hereinafter "Kravis Response").

As noted in the Kravis Response, Mr. Kravis, on his own volition, prior to the filing of this complaint and the complaint to MUR 3104, sought and received refunds from political committees designated for the 1988 elections so as to bring his aggregate contributions below the $25,000 annual limit. (See Kravis Response, page 4).

In view of the fact that the Respondent has acted on his own volition to obtain refunds of contributions prior to the time that this complaint was filed, the Respondent hereby requests that the Commission make a finding of no reason to believe and close this matter.

Respectfully submitted,
Wunder, Ryan, Cannon & Thelen

By Kenneth S. Levine and
Paul E. Sullivan

cc: Chairman Elliott
Vice-Chairman McGarry
Commissioner Aikens
Commissioner Josefiak
Commissioner McDonald
Commissioner Thomas

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STATEMENT OF DESIGNATION OF COUNSEL

MUR 3161

NAME OF COUNSEL: Kenneth S. Levine and Paul Sullivan

ADDRESS: Wunder, Ryan, Cannon & Thelen
1615 L Street, N.W., Suite 650
Washington, D.C. 20036

TELEPHONE: (202) 659-3005

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.

11/28/90
Date

Signature

RESPONDENT'S NAME: Henry R. Kravis

ADDRESS: 71 East 71st Street
New York, New York 10021

HOME PHONE:

BUSINESS PHONE: (212) 230-9403

9304093399776

OGC 8809

LAW OFFICES
WUNDER, RYAN, CANNON & THELEN
1615 L STREET, N.W., SUITE 650
WASHINGTON, D. C. 20036
(202) 659-3005
FACSIMILE: (202) 659-3010

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 NOV 30 AM 3:49

November 30, 1990

Lawrence M. Noble, Esq.
General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

RE: MUR 3161: Raymond Kravis Response

Attn: Francis Hagan

Dear Ms. Hagan:

On November 26, 1990 we received a copy of the complaint filed by Common Cause in MUR 3161 relating to Mr. Raymond Kravis ("Respondent"). This response is submitted to the Commission pursuant to 2 U.S.C. §437g(a)(1) on behalf of the Respondent. By this document, the Respondent requests that the Commission take no further action relative to the alleged violations contained in the complaint.

This complaint is based on the same factual situation as presented in MUR 3026, namely that Respondent has exceeded his aggregate calendar year contribution limit as set forth at 2 U.S.C. §441a(a)(3). In response to this matter, Respondent relies upon and fully incorporates herein the response submitted to the Commission on September 21, 1990 in MUR 3104. (Hereinafter "Kravis Response").

Prior to the time that this complaint was filed, Raymond Kravis on his own volition, sought and received refunds from political committees so as to bring his aggregate contribution amount for calendar year 1988 below the $25,000 aggregate limit. (See Kravis Response, pages 5 and 6).

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In view of the fact that the Respondent has acted on his own volition to obtain refunds of contributions prior to the time that this complaint was filed, the Respondent hereby requests that the Commission make a finding of no reason to believe and close this matter.

Respectfully submitted,
Wunder, Ryan, Cannon & Thelen

By Kenneth S. Levine and
Paul E. Sullivan

cc: Chairman Elliott
Vice-Chairman McGarry
Commissioner Aikens
Commissioner Josefiak
Commissioner McDonald
Commissioner Thomas

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STATEMENT OF DESIGNATION OF COUNSEL

MUR 3161

NAME OF COUNSEL: Kenneth S. Levine and Paul Sullivan

ADDRESS: Wunder, Ryan, Cannon & Thelen
1615 L Street, N.W., Suite 650
Washington, D.C. 20036

TELEPHONE: (202) 659-3005

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.

Nov. 29, 1990
Date

Raymond F. Kravis
Signature

RESPONDENT'S NAME: Raymond F. Kravis

ADDRESS: 1804 First National Building
Tulsa, Oklahoma 74103

HOME PHONE: (918) 742-3294

BUSINESS PHONE: (918) 587-5161

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SKADDEN, ARPS, SLATE, MEAGHER & FLOM
1440 NEW YORK AVENUE, N.W.
WASHINGTON, D.C. 20005-2107

(202) 371-7000

FAX: (202) 393-5760
DIRECT DIAL
(202) 371-

BOSTON
CHICAGO
HONG KONG
LONDON
LOS ANGELES
NEW YORK
SYDNEY
SAN FRANCISCO
TOKYO
WILMINGTON

RECEIVED
FEDERAL ELECTION COMMISSION
90 DEC -3 AM 11:57

December 3, 1990

BY HAND

Lawrence M. Noble, Esq.
General Counsel
Federal Election Commission
999 E Street, Northwest
Washington, D.C. 20463

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 DEC -4 AM 10:57

Re: MUR 3161 - Respondent: Ronald O. Perelman

Dear Mr. Noble:

The letter is submitted in response to the complaint filed by Common Cause against several individuals alleging that they made excessive contributions to federal political committees in 1988. Our response in MUR 3104 demonstrates that Mr. Perelman did not exceed the limit. Rather than repeating our response, we incorporate by reference the response we submitted in MUR 3104 and attach a copy for your convenience.

Accordingly, our response demonstrates that the Commission should dismiss both cases.

Please call me if you have any questions.

Sincerely,

Kenneth A. Gross

Attachment

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SKADDEN, ARPS, SLATE, MEAGHER & FLOM
1440 NEW YORK AVENUE, N.W.
WASHINGTON, D.C. 20005-2107
(202) 371-7000

FAX (202) 393-5760
DIRECT DIAL
(202) 371-

BOSTON
CHICAGO
HONG KONG
LONDON
LOS ANGELES
NEW YORK
SYDNEY
SAN FRANCISCO
TOKYO
WILMINGTON

September 26, 1990

90 SEP 26 PM 5:11

BY HAND

Lawrence M. Noble, Esq.
General Counsel
Federal Election Commission
999 E Street, Northwest
Washington, D.C. 20463
Attn: Frances B. Hagan

Re: MUR 3104 - Respondent: Ronald O. Perelman

Dear Mr. Noble:

This letter is submitted on behalf of Ronald O. Perelman in response to the finding of the Federal Election Commission ("FEC" or "Commission") in the above-referenced matter. Preliminarily, as counsel for the respondent, we object to the procedure in this matter. Had we been afforded an opportunity to submit our position to the Commission prior to a finding of reason to believe, this matter might have been avoided saving the resources of both the Commission and the respondent. Reason to believe having been found without providing this opportunity, we submit this preliminary response to the Commission's finding of reason to believe and its request for information.

The Commission's Factual and Legal Analysis alleges that the respondent made contributions to federal candidates and political committees in excess of the 1988 annual contribution limit by $7,500. In response to the Commission's request for information, we have attached copies of both sides of canceled checks and solicitation materials pertaining to the list of contributions identified in the Factual and Legal Analysis. (Attachment A.) We further note that the respondent has no record of making any contributions of less than $500 pertaining to the 1988 election.

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Based on the information provided in response to the Commission's request for information, the additional documentation attached, and the arguments made herein, the Commission should exclude the following contributions from the respondent's 1988 calendar year limit: (1) Republican National Committee ("RNC") - $5,000; (2) Bill Green for Congress - $1,000; (3) Biden for President - $1,000; and (4) Moynihan Committee - $2,000. If the computation in the Factual and Legal Analysis is adjusted accordingly, the respondent's 1988 contribution total would be $23,500, $1,500 under the limit.* Accordingly, the Commission should find no probable cause a violation occurred.

Should the Commission conclude that the respondent exceeded the calendar limit, we ask that the following mitigating circumstances be considered: (1) respondent sought and obtained refunds; and (2) respondent did not come close to the contribution limit in any calendar year other than 1988. In fact, the respondent was so far below the limit in 1987 and 1989 that the entire $10,000 contribution to the Democratic Senatorial Campaign Committee could have been made in either year. Thus, the issue comes down to the timing of the contributions rather than the amount of the contributions. For all of these reasons, even if the reason to believe finding were supportable, the Commission should take no further action with regard to the respondent.

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* We note that on a straight calendar year basis, the respondent only contributed $23,500 in 1988 and $11,000 in 1987, even if all the contributions listed in the FEC schedules are counted as contributions for federal elections. This is true even if the Commission includes in the straight calendar year computation contributions made to candidates running in 1990.

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Exclusion of Specific Contributions

(1) Republican National Committee

The respondent has no record of making a contribution to the RNC or the Republican National Finance Committee, the entities identified on the FEC printout of respondent's contributions. (See Attachment B - FEC printout of Ronald O. Perelman's contributions.) On June 24, 1988, the respondent, however, made a $5,000 contribution to an entity or account called "The Presidential Trust," which was apparently deposited into an RNC federal election account. (See Attachment A(16) - copy of contribution check.) According to the Presidential Trust solicitation materials, a contributor to the Presidential Trust could attend a dinner with then Vice President and Mrs. George Bush. (See Attachment A(16) - copies of the Presidential Trust solicitation materials.) As was often Mr. Perelman's practice when making a political contribution, it was reviewed by Richard Halperin. Richard Halperin is the Senior Vice President of MacAndrews & Forbes Group Incorporated and Special Counsel to Ronald O. Perelman, Chairman of MacAndrews & Forbes Group Incorporated. As stated in Mr. Halperin's affidavit, at the time he authorized and decided that the contribution be made, he believed that the Presidential Trust contribution was a contribution to a non-federal account. (See Attachment C - Halperin affidavit.)

Mr. Halperin's confusion concerning the Presidential Trust contribution is understandable in view of prior contributions he had authorized. Beginning in 1986, through to the present year, Mr. Halperin authorized contributions every Spring to an RNC sponsored presidential dinner. In 1988, however, instead of authorizing a contribution to the Presidential Dinner, Mr. Halperin authorized the contribution to the Presidential Trust, which was featured as a vice-presidential dinner. It turned out, however, that the Presidential Trust contribution made in 1988 went to a federal account and the President's Dinner contributions in the other years went to non-federal accounts. It is not obvious from the solicitation materials received by Mr. Perelman, as compared with numerous other solicitations to both federal and non-federal accounts, that the Presidential Trust

dinner contribution counted toward the $25,000 annual limit on federal contributions. When Mr. Halperin learned that the Presidential Trust contribution was made to a federal account, he obtained a refund and "redonated" the funds to a non-federal account consistent with his original intent. (See Attachment D - refund check.)

A similar situation arose in MUR 1059 (Respondent: H.E. Chiles). In that case, the respondent intended to make a contribution to an RNC non-federal election account (the building fund) but the contribution was deposited into a federal account. The Commission, however, gave the contributor the benefit of the doubt and did not count the contribution as a federal contribution. As was the case in MUR 1059, Mr. Halperin in this case received several solicitations from the RNC for the federal election account and several solicitations for the non-federal election account. Because of the annual Spring giving to an RNC-sponsored presidential dinner that had been made to a non-federal election account prior to 1988, Mr. Halperin thought this was the same annual event. The payee on the contribution checks to the non-federal election account was "The President's Dinner," the payee on the contribution check in this case was "The Presidential Trust." As a consequence of this understandable confusion and because the contribution was intended for a non-federal election account, the Commission should not count the Presidential Trust contribution against Mr. Perelman's 1988 annual federal limit.

(2) Bill Green for Congress

On March 6, 1987, the respondent made a $1,000 contribution to the Committee for Congressman Bill Green ("Green Committee"). The purpose of the contribution was to join what Congressman Green calls his Congressional Club even though the funds are used for campaign purposes. Although the respondent made contributions to the Green Committee on February 11, 1987, and March 6, 1987, and it appears that the Green Committee intended to apply both contributions for 1986 debt retirement, the General Counsel has treated only the February contribution as a 1986 contribution. Indeed, the FEC public record shows both contributions as being made "For 1986." (See Attachment B - FEC computer printout.) Moreover, when the

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Green Committee accepted the March contribution from the respondent, it had sufficient outstanding net debt to apply the respondent's contribution to the 1986 campaign deficit. For this reason alone, the Commission should not count the March 1987 contribution to the Green Committee against Mr. Perelman's 1988 annual limit. There is an additional reason, however, not to charge Mr. Perelman's 1988 limit with the March 1988 Green Committee contribution. At the time of this contribution, the FEC's regulations concerning post-general election contributions were ambiguous.

When the Green Committee accepted the respondent's March 1987 contribution, the Commission's regulations did not address the handling of post-general election contributions in the way it addressed post-primary contributions. With regard to contributions received after the primary election but before the general election, the former regulations at 11 C.F.R. § 110.1(a)(2)(i) stated that such contributions must be designated by the contributor in writing in order to count the contribution toward the limit for the primary election that had just occurred (assuming there was a primary election debt). Otherwise the contribution would be applied to the general election. There was no similar regulation with respect to contributions received after the general election. In fact, the former regulations did not require a contribution received after the general election to be designated in writing by the contributor for the preceding election. Under 11 C.F.R. § 102.9(e), the recipient campaign could choose to designate the contribution to a prior campaign as long as the prior campaign had a net debt in excess of the amount of the contribution even without the contributor's written designation.

Soon after the respondent made the March contribution to the Green Committee, the Commission revised its regulations at 11 C.F.R. § 102.9(e) and 11 C.F.R. § 110.1(a)(2)(i). The revised regulations clarified that a campaign committee receiving a post-general election contribution may not redesignate that contribution without the contributor's written designation. The Explanation and Justification to the revised regulations for section 102.9(e) states that the purpose of the revised

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regulations was to correct a defect in the former regulations that allowed the recipient campaign to redesignate a post-general election contribution without the contributor's written designation. Thus, prior to the change in the regulations, regardless of the contributor's intent, the recipient campaign committee could designate a contribution as a contribution to a prior election as long as the campaign committee had net outstanding debt.

Based on the language of FEC's prior regulations, the FEC report noting that Mr. Perelman's contributions were for the "'86 deficit," and the FEC's computer-generated schedules showing the 1987 contributions as contributions "For 1986," the Commission should count the March 1987 contribution to the Green Committee against Mr. Perelman's 1986 calendar year limit.*

(3) Biden for President

On June 25, 1987, the respondent made a $1,000 contribution to Biden for President. On September 23, 1987, Senator Biden publicly withdrew from the presidential race and ceased to campaign for the presidency. (See Attachment E - copy of press report). It is anomalous and contrary to the FEC's regulations to count a contribution as being made in 1988 when the contribution, in fact, was made in 1987 to a candidate who renounced his candidacy in 1987 and never ran for election in 1988. The logic of applying the Biden for President contribution to the respondent's 1987 annual limit instead of the 1988 limit is supported by the FEC's dual candidacy regulations (former 11 C.F.R. § 110.3(a)(2)(v)(A), currently 11 C.F.R. § 110.3(c)(5)(i)(A)) when read in pari materia with the FEC's regulations on the $25,000 calendar year limit (formerly 11 C.F.R. § 110.5(b)(1), currently 11 C.F.R. 110.5(c)(2)).

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* As for the 1986 "per election" limits, the contributor can only be held accountable for contributions he gave during the 1986 cycle or designated in writing for the 1986 election.

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After abandoning the nomination for the presidency in 1987, Senator Biden was free to transfer his presidential campaign contributions to his 1990 senatorial campaign committee. The Commission's regulations state that if an individual is a candidate for two offices, he may transfer funds from one campaign committee to another if he is not actively seeking election to more than one office. Under section 110.3(c)(5)(ii) (formerly 11 C.F.R. § 110.3(a)(2)(v)(B)), contributions made to the abandoned transferor campaign are treated as if they were made to the transferee campaign. Thus, when Senator Biden publicly announced, in 1987, that he was no longer seeking the presidential nomination, those presidential campaign funds lost their character as 1988 contributions prior to calendar year 1988.

The FEC's regulations pertaining to the $25,000 annual limit stated that a contribution counts against a contributor's annual limit if the contribution is made in a year other than in the calendar year in which an election is held if the contribution is made with respect to a particular candidate and election (former 11 C.F.R. § 110.5(b)(1) revised in 1990 at 11 C.F.R. § 110.5(c)(2)). Pursuant to former section 110.5(b)(1), a contributor cannot make a contribution with respect to an election in an election year if a candidate publicly renounces his campaign under section 110.3(a)(2)(v)(B) prior to the election year. Thus, the abandonment of the campaign resulted in the abandonment of the use of those campaign funds for actively seeking nomination or election to office in the 1988 election.

Moreover, it is inconsistent to consider contributions made to the abandoned campaign as contributions counting against a contributor's 1988 annual year limit, the year of the election of the transferor committee, and have that same contribution count toward that contributor's 1990 per election limit upon transfer to a 1990 committee. Conversely, if the funds are not transferred, as in this case, and the presidential campaign is abandoned prior to the election year, those funds should not be treated as 1988 contributions for purposes of the annual year contributor limit.

9304093339387

To avoid the anomalous result of counting contributions against a contributor's annual limit in a year that the recipient candidate never ran, the contributions made to that campaign should count against the contributor's annual limit in the calendar year in which the funds were contributed.

(4) Moynihan Contributions

The FEC's contributor index shows that Mr. Perelman contributed to the Moynihan Committee in January 1987. (See Attachment B - FEC computer printout.) As shown on the enclosed checks made out to the Moynihan Committee, the respondent made a $2,000 contribution in December 1986. (See Attachment A(1) - Copies of checks to the Moynihan Committee). Based on the Commission's treatment of prior MURs involving the $25,000 limit, if a contribution exceeded the annual limit in, for example, 1988, the Commission would not attempt to attribute the contributor's 1988 calendar year limit to a contribution made before 1987, i.e., beyond the election cycle. (See Attachment F - an example of an internally generated referral sheet from the Reports Analysis Division involving an alleged $25,000 annual limit violation.)

In this case, the respondent made a contribution to the Moynihan Committee in 1986, and Senator Moynihan did not publicly announce his reelection bid until 1988. (See Attachment G - a copy of Senator Moynihan's 1988 solicitation materials.) While Senator Moynihan was technically a candidate for the 1988 election in 1986, it is unreasonable to expect an individual contributing to a campaign to realize that a 1986 contribution will count towards his 1988 calendar year limit. Consequently, as a matter of fairness, the Commission should take into consideration this unprecedented application of the $25,000 annual limit provision and not count the contribution to the Moynihan Committee towards respondent's 1988 annual limit.

9304093399888

9304093399

Mitigating Circumstances the Commission Should Take Into Consideration in Dismissing This Matter.

Although the arguments made demonstrate that the Commission should find no probable cause that the respondent exceeded the 1988 annual limit, if the Commission continues to contend that the respondent may have exceeded the limit, we request that the Commission consider the following mitigating factors.

(1) Refunds Sought and Obtained

The respondent received a refund of $5,000 from the RNC for The Presidential Trust contribution. (See Attachment D - refund check.) In addition, the respondent has sought a $5,000 refund from the Democratic Senatorial Campaign Committee. The respondent hopes that this additional and abundantly cautious step in attempting to mitigate this situation will be taken into consideration in dismissing this matter.

(2) Respondent Has Not Come Close to the Limit in Other Years.

The respondent has never come close to the calendar year limit in any year other than 1988. As mentioned at the outset, the respondent's contribution of $10,000 to the Democratic Senatorial Campaign Committee could have been made in either 1987 or 1989. The total contributions made by the respondent over the 1987-1988 election cycle fall well below the $50,000 allowed over the election cycle. Moreover, in prior MURs, the Commission, after finding reason to believe, has taken no further action against respondents who have exceeded the limits in amounts far in excess of the amount involved in this case. See MURs 1893 (In Re J. Valenti) and 1526 (In Re M. Cogan). In fact, in no case has the Commission sought a civil penalty in a matter involving the extenuating circumstances described herein.

For reasons stated, the Commission should find no probable cause that the respondent exceeded the 1988 annual limit, or in the alternative, the Commission should take no further action and dismiss this case.

Sincerely,

Kenneth A. Gross

Attachments

93040093399O

Attachment A	Copies of both sides of canceled checks and some solicitation materials concerning the contributions listed in the attachment to the Commission's reason to believe finding.
1	The Moynihan Committee
2	Committee for Congressman Green
3	Friends of Tom Lantos
4	Friends of Gary Hart
5	Metzenbaum for Senate
6	Biden for President
7	Gephardt for President
8	Dole for President
9	Pete Dawkins for Senate
10	Albert Gore for President
11	Democratic Senatorial Campaign Committee
12	Licht '88 Committee
13	Riegle for Senate Committee
14	McCarthy for Senate
15	Californians for Pete Wilson
16	The Presidential Trust
17	Dukakis for President
Attachment B	FEC Printout of Ronald O. Perelman's contributions
Attachment C	Affidavit of Richard E. Halperin
Attachment D	Refund Check
Attachment E	Congressional Quarterly Report on Senator Biden's Withdrawal from the Presidential Race
Attachment F	Sample Reports Analysis Division Internal Referral Sheet
Attachment G	Copy of The Moynihan Committee's 1988 Solicitation Materials

9304093391

Attachment A

Copies of both sides of canceled checks and some solicitation materials concerning the contributions listed in the attachment to the Commission's reason to believe finding.

1. The Moynihan Committee
2. Committee for Congressman Green
3. Friends of Tom Lantos
4. Friends of Gary Hart
5. Metzenbaum for Senate
6. Biden for President
7. Gephardt for President
8. Dole for President
9. Pete Dawkins for Senate
10. Albert Gore for President
11. Democratic Senatorial Campaign Committee
12. Licht '88 Committee
13. Riegle for Senate Committee
14. McCarthy for Senate
15. Californians for Pete Wilson
16. The Presidential Trust
17. Dukakis for President

9304093399 2

Attachment A

1. The Moynihan Committee

9304093399 93

930409339944

654

1468

RONALD O. PERELMAN
36 EAST 63RD STREET
NEW YORK, NY 10021

Dec. 31, 1986. 1-231 / 1131

PAY TO THE ORDER OF The Mayoralty Committee, Inc. $ 2,000

Two Thousand and 00/100 DOLLARS

CHASE

The Chase Manhattan Bank, N.A.
726 Madison Avenue at
64th Street
New York, N.Y. 10021

MEMO

Ronald Perelman

RICHARD E HALPERIN
36 EAST 63RD STREET
NEW YORK, NEW YORK 10021

31 December 1986

Mr. John Westergaard
The Moynihan Committee
Westergaard Fund
540 Madison Avenue - Fourth Floor
New York, N.Y. 10022

Dear John:

On behalf of Revlon's Chairman, Ronald O. Perelman, it is a pleasure to support Senator Moynihan.

Pat has consistently provided outstanding leadership on many important issues in the Senate.

Please keep us advised on Pat's future activiteis.

Warmest personal regards,

Sincerely,

Richard E. Halperin

Enclsoure: Moynihan Committee Inc. - $2000.00

RONALD O. PERELMAN
36 EAST 63RD STREET
NEW YORK, NY 10021

1468

Dec. 31, 1986

1-23
210

PAY TO THE ORDER OF The Moynihan Committee, Inc. $2,000

Two Thousand and 00/100 DOLLARS

CHASE
The Chase Manhattan Bank, N.A.
726 Madison Avenue at
64th Street
New York, N.Y. 10021

MEMO

9304009339995

Attachment A

2. Committee for Congressman Green

93040933996

930409339997

1727

RONALD O. PERELMAN

March 6 19 87

PAY TO THE ORDER OF Committee for Congressman Green $ *1,000.00

*One thousand and NO/100 DOLLARS

CHASE

The Chase Manhattan Bank, N.A.
726 Madison Avenue at
64th Street
New York, N.Y. 10021

renewal for membership in club

Ronald Perelman

Attachment A

3. Friends of Tom Lantos

93040933998

930400933999

RONALD O. PERELMAN

1821

BLK-1L

PAID April 7 19 87

1-231
2103

PAY TO THE ORDER OF Friends of Tom Lantos $ *1,000.00

*One thousand and 00/100---------- DOLLARS

CHASE

The Chase Manhattan Bank, N.A.
726 Madison Avenue at
64th Street
New York, N.Y. 10021

MEMO contribution

100

Attachment A

4. Friends of Gary Hart

93040934000

RONALD O. PERELMAN
38 EAST 63RD STREET
NEW YORK, NY 10021

PAID

1996

April 24 19 87

PAY TO THE ORDER OF Friends of Gary Hart $ *1,000.00

*One thousand and no/100---------- DOLLARS

CHASE
The Chase Manhattan Bank, N.A.
726 Madison Avenue at
64th Street
New York, N.Y. 10021

MEMO donation EVNYC7, ECNY16

Ron Perelman

00

9300409340001

The
Friends of Gary Hart
cordially invite you to join
Lee and Gary Hart
at
A Gala Dinner
on
Tuesday, May 5, 1987
at the
Sheraton Centre Hotel
Seventh Avenue at 52nd Street
Cocktails at 6:15
Dinner at 7:15

Business attire

RSVP

Miriam J Ornstein
Maurice S Paprin
Donald A Petrie
Hon Peter Peyser
Andrew Reegen
Douglas P Rosen
John Ryan
Loulette Samuels
Theodore C Sorensen
Howard M Squadron
Peter Stone
Zane Tankel
Jeffrey W Tindell
Donald J Trump
Peter Tufo
Charles Uribe
Amy Vance
Katrina vanden Heuvel
Matthew Wanning
Cecille & Herbert Wasserman
Bruce Wasserstein
(Committee in formation)

930409340002

RONALD O. PERELMAN
36 EAST 63RD STREET
NEW YORK, NY 10021

1996

April 24 19 87

PAY TO THE ORDER OF Friends of Gary Hart $ *1,000.00

*One thousand and no/100 DOLLAR

CHASE
The Chase Manhattan Bank, N.A.
726 Madison Avenue at
64th Street
New York, N.Y. 10021

MEMO donation

Ron Perelman

Attachment A

5. Metzenbaum for Senate

9304093400003

2139

RONALD O. PERELMAN
38 EAST 63RD STREET
NEW YORK, NY 10021

June 5 19 87

1-230
2131

PAY TO THE ORDER OF Howard Metzenbaum for Senator $ *1000.00

*One thousand and no/100= DOLLARS

CHASE

The Chase Manhattan Bank, N.A.
726 Madison Avenue at
64th Street
New York, N.Y. 10021

MEMO contribution

00

930400934004

Attachment A

6. Biden for President

93040934005

930040934 0006

RONALD O. PERELMAN
36 EAST 63RD STREET
NEW YORK, NY 10021

2258

June 25 19 87

1-210
2131

PAY TO THE ORDER OF Biden for President $ 1,000.00

One thousand & no/100 DOLLARS

CHASE
The Chase Manhattan Bank, N.A.
726 Madison Avenue at
64th Street
New York, N.Y. 10021

MEMO ROP contribution

000

Attachment A

7. Gephardt for President

93040934007

9304093400 8

RONALD O. PERELMAN
36 EAST 63RD STREET
NEW YORK, NY 10021

2415

October 28 19 87

PAY TO THE ORDER OF Gephardt for President $ *1,000.00

*One thousand and no/100---------- DOLLARS

The Chase Manhattan Bank, N.A.
726 Madison Avenue at 64th Street
New York, NY 10021

CHASE

donation NEWY/PC06

Ronald O. Perelman

Attachment A

8. Dole for President

9304093400 09

.930400934010

RONALD O. PERELMAN
39 EAST 63RD STREET
NEW YORK, NY 10021

17

2466

November 11 19 87

PAY TO THE ORDER OF Dole for President $ *500.00

*Five hundred and no/100---------- DOLLARS

The Chase Manhattan Bank, N.A.
726 Madison Avenue at 64th Street
New York, NY 10021

CHASE

MEMO pol. cont. FLEG NY

Jane Stanton

100%

Dole for President

P. O. Box 9000
Mineola, New York 11501

930409340111

New York Salute to Senator Robert Dole
Grand Hyatt Hotel, New York
September 16, 1987

Name _____

Address _____

City/State _____ Zip _____

Occupation _____

Name of Business _____

Spouse's Name _____

Telephone Home _____ Business _____

☐ Yes, I will attend the Cocktail Reception on September 16th, honoring Senator Dole. Enclosed is my personal check for one thousand dollars ($1000)

☐ I regret I am unable to attend the Reception, however, enclosed is my contribution.

Please make checks payable to:
DOLE FOR PRESIDENT COMMITTEE
Corporate checks are not permitted by Federal Law

PLEASE RETURN THIS CARD TOGETHER WITH YOUR CONTRIBUTION
NO LATER THAN SEPTEMBER 1st.

SF

Paid for by Dole for President Exploratory Committee

New York Salute to Senator Robert Dole

General Co-Chairman
Charles A. Gargano
Rand V. Araskog
Stephen M. Ross
Honorary Committee
Agre, Mary Cunningham
Agre, William J.
Alberto, Sam
Albright, Harry
Alger, Frederick M., III
Ames, John
Andrews, Dwayne O.
Araskog, Jessie M.
Asaro, Joseph
Axelrad, Michael
Balkany, Rabbi Yehoshua
Barker, Stuart
Berger, Lee
Bernstein, Harold
Bernstein, Marvin
Brady, Ken
Campbell, John
Carter, Donald C.
Carter, Jennifer
Carter, John B.
Castle, John
Catsimatidis, John
Charasse, Deborah
Camacho, Anthony
D'Amato, Armand
Davis, Martin
De Masters, Fred
De Vino, Vincent
Di Marco, Gerry
Dio Guardi, Honorable Joseph
Dooley, James
Dorne, Edward B., Jr.
Downey, Robert
Edelman, Marty
Elsesser, Lawrence
Falcone, Michael
Farchgrasshaugh, James
Feldman, Irving
Feldner, Gary
Fisher, Richard
Ford, Charlotte
Frazer, Aline
Fried, Michael
Galea, Francesco
Garofalo, Josephine
Glenberg, Donald
Glick, Jeffrey
Goldstein, Sheldon
Goldman, Lynn
Gordon, Edward
Gould, Fred
Gruber, Frederic
Hallingby, Paul
Hartman, Richard
Hauser, Rita
Heard, Craig
Heard, Terry
Jeffries, Christopher
Jenkins, Dale
Joseph, Frederick H.
Kellner, Peter
Kapiloff, John
Karsch, Steven
Landes, Leonard
Levin, Neil
Lichtenberg, Jeffrey
Mark, David
Mallin, Robert
Marron, Donald
Marquez, James
Marshall, Alton
Messinger, Hans
Meyer, Edward
Milstein, Howard
Nacterin, Barbara
Nastasi, Frank
Neal, Richard
Pace, Anthony
Pagano, Charles
Parker, Jack
Pastoressa, Nicholas
Pastore, Henry
Peartree, Ronald
Perpich, James
Price, Robert
Pustilla, Michael
Ratcliffe, Martin
Rieber, John
Robertson, Julian
Rosenberg, Robert
Rosenwald, John
Rudin, Lewis
Schulman, William
Schwartz, Warren
Sherman, Fred
Silverstein, Larry
Smith, Peter
Spahn, Constance
Sawyer, Jerry
Steinberg, Saul P.
Steinberg, Gudrun
Tisch, James
Trump, Donald
Walsh, Neil
Weiss, Gene
Wyser-Pratte, Guy
Zorn, Jay

Dear Friend:

On Wednesday, September 16th, a very special event is being held at the Grand Hyatt in New York City honoring United States Senator Robert Dole. We are writing to cordially invite you to join Secretary of Transportation Elizabeth Dole and other distinguished guests to pay tribute to Senator Dole.

Bob Dole is a man of uncommon integrity who has devoted his life to public service. As a soldier during World War II, local legislator, Congressman, and United States Senator, he has consistently demonstrated his commitment to this great nation. His tenure as majority leader of the United States Senate led to the enactment of historic legislation which turned our economy around and increased our stature in the world community.

Many difficult challenges face this nation, and Bob Dole is the person we need as President leading us in the years ahead. Your contribution of $1000.00 will go to the committee created to promote Senator Dole's campaign for the Presidency.

Please join many of your fellow New Yorkers in supporting this important effort, and plan on being at the Grand Hyatt on September 16th from 5:30 to 7:30 p.m. to meet the next President of the United States.

Sincerely,

Charles A. Gargano
General Co-Chairman

Rand V. Araskog
General Co-Chairman

Stephen M. Ross
General Co-Chairman

Paid for by Dole for President Exploratory Committee

930409340012

New York Salute to

Senator Robert Dole

Charles A. Gargano
General Co-Chairman

Rand V. Araskog
General Co-Chairman

Stephen M. Ross
General Co-Chairman

The pleasure of your company is requested
at a cocktail reception in honor of

Senator Robert Dole

on Wednesday, the sixteenth of September
Nineteen hundred and eighty seven

Special Guest
The Honorable Elizabeth H. Dole

Empire State Ballroom
Grand Hyatt Hotel

Five thirty to
Seven thirty

Donation
$1000.00

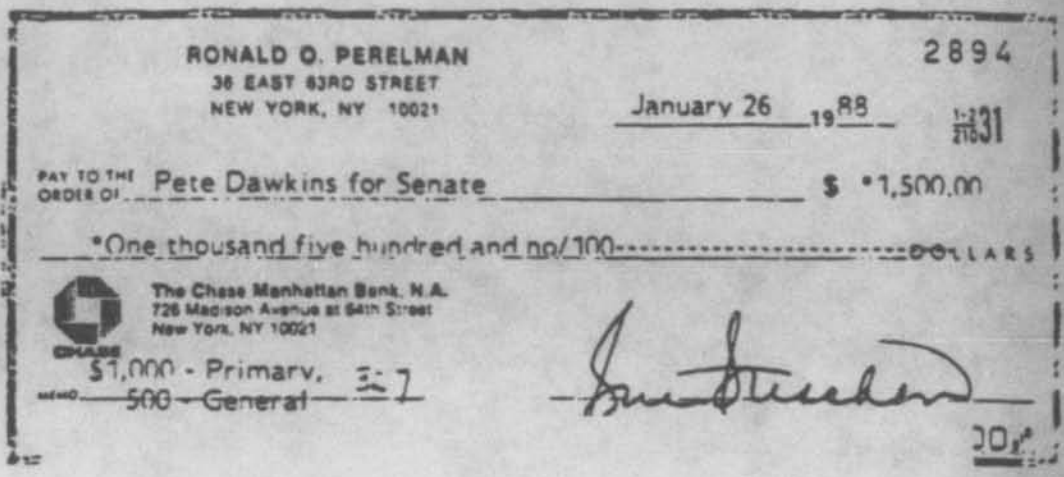
9304093400013

Dole for President
P.O. Box 9000
Mineola, New York 11501

Attachment A

9. Pete Dawkins for Senate

9304093401 4



RONALD O. PERELMAN
36 EAST 63RD STREET
NEW YORK, NY 10021

2894

January 26 1988

1-210/231

PAY TO THE ORDER OF Pete Dawkins for Senate $ *1,500.00

*One thousand five hundred and no/100 DOLLARS

The Chase Manhattan Bank, N.A.
726 Madison Avenue at 64th Street
New York, NY 10021

CHASE

memo $1,000 - Primary, 500 - General

Ron Perelman

930400934015

Attachment A

10. Albert Gore for President

9304093401 6

93040934017

18.

RONALD O. PERELMAN
36 EAST 63RD STREET
NEW YORK, NY 10021

#17

EVN V 10
FCNY21

3131

April 7 19 88

1-231
2131

PAY TO THE ORDER OF Albert Gore for President $ *1,000.00

*One thousand and no/100---------- DOLLARS

The Chase Manhattan Bank, N.A.
726 Madison Avenue at 64th Street
New York, NY 10021

CHASE

MEMO contribution

000

Dinner Chairpersons

Alan John Blinken
Donald G. Drapkin
Pamela C. Harriman
Benjamin D. Holloway
Jerome R. McDougal
Sandy and Robert W. Pittman
Peter J. Solomon
Maurice Sonnenberg
Howard Squadron
Thomas J. Tisch
Charles Uribe

Dinner Committee

David Aaron
Marife Hernandez and Alan Alpern
Joanne F. and Donald E. Axinn
Roland Betts
Joanne and Richard Bing
Melinda Blinken
The Honorable Jacob Bronner
F. Forrester Church
Barbara and Arnold Cohen
John Connorton
Delores and Alfred DelBello
Robin Chandler Duke and
The Honorable Angier Biddle Duke
John S. Dyson
R. Peter M. Elrick
Arthur D. Emil
Joseph T. English, M.D.
Dasha Epstein
Kenneth K. Fisher
Ambassador and Mrs. Richard Gardner
John G. Heimann
Mildred and Alvin Hellerstein
The Honorable Richard Holbrooke
Bruce Johnson
Katharine Johnson
Richard Kahan
Sarah and Victor Kovner
Ramon A. Lamontagne
James Lindheim
Lawrence A. Mandelker
The Honorable Warren D. Manshel
Win and Anne McCormack
Estelle and Robert Miller
Roger Neece
Martin Peretz
Mike Pietrangelo
Sanford Prater
Kenneth E. Raske
Coates Redmond
Dorothy and Edwin Roer
Lois and Donald Rivkin
Joseph B. Rose
Howard Rosen
Jeffrey Sachs
Robert L. Schiffer
Peter Schoenfeld
Anne Seel
Richard Solomon
Gillian Sorenson
Joanne and Joseph Stein, Jr.
Howard B. Teich
Pauline Trigere
Wallace C. Turbeville
Mary and Alfred Winslow-Jones
Robert Zastrow

93040934018

NEW YORK DESERVES THE BEST!

Join

SENATOR AL GORE

for

Dinner at The Pierre
Tuesday, April 12
Fifth Avenue at 61st Street

Cocktails 7:30
Dinner 8:30

R.S.V.P. (212) 682-4060

9304093

AL GORE FOR PRESIDENT

New York State Executive Committee

The Honorable Thomas J. Downey, Chairman
The Honorable Alfred B. DelBello, Vice Chairman
Alan John Blinken, Finance Chairman
Lawrence A. Mandelker, Counsel
Aida Alvarez, Co-Chairperson
John Connorton, Co-Chairperson
The Honorable Richard Gardner, Co-Chairperson
Sarah Kovner, Co-Chairperson

☐ I would like to attend the dinner @ $1000 per person Enclosed is my contribution of $ _____ for _____ tickets

☐ I am unable to attend, but am delighted to contribute to the campaign

Enclosed is my personal check for $ _____

Federal Law
- permits individuals to give $1000 per presidential campaign per candidate ($1000 each from husbands and wives)
- prohibits corporate contributions

Make Checks payable to ALBERT GORE FOR PRESIDENT

Name _____

Residence _____

Town/Zip _____ Telephone _____

Occupation _____ Employer _____

Information required for Federal Election Commission
Authorized and paid for by Gore for President Campaign

* 5312

9304093400 20

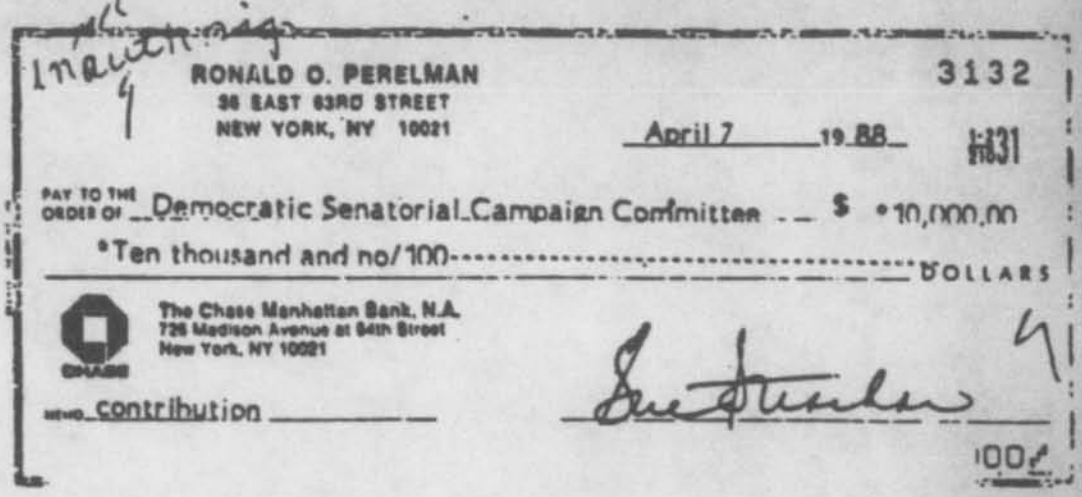
GORE FOR PRESIDENT
565 FIFTH AVENUE, 6TH FLOOR
NEW YORK, NY 10017

Attachment A

11. Democratic Senatorial Campaign Committee

93040934021

930409340022



RONALD O. PERELMAN
36 EAST 63RD STREET
NEW YORK, NY 10021

3132

April 7 19 88

PAY TO THE ORDER OF Democratic Senatorial Campaign Committee $ *10,000.00

*Ten thousand and no/100 DOLLARS

The Chase Manhattan Bank, N.A.
726 Madison Avenue at 64th Street
New York, NY 10021

CHASE

MEMO contribution

Ronald O. Perelman

1:0321 0031

1002

Attachment A

12. Licht '88 Committee

9304093400023

930409340024

RONALD O. PERELMAN
38 EAST 63RD STREET
NEW YORK, NY 10021

3207

April 21 19 88

1-231
210

PAY TO THE ORDER OF Licht '88 Committee $ *1,000.00

*One thousand and no/100 DOLLARS

The Chase Manhattan Bank, N.A.
726 Madison Avenue at 64th Street
New York, NY 10021

CHASE

MEMO contribution

Ronald O. Perelman

00

Attachment A

13. Riegle for Senate Committee

9304093400 25

EMPLOYER

Corporate checks are not permitted by the Federal Election Commission

RIEGLE FOR SENATE COMMITTEE
P.O. Box 2434
Washington, D.C. 20013

NAME Mr. Ronald O. Perelman

ADDRESS 36 East 63rd Street
New York NY 10021

PHONE

OCCUPATION

EMPLOYER

Corporate checks are not permitted by the Federal Election Commission

93040934026

RIEGLE FOR SENATE COMMITTEE

I, Ronald O. Perelman, want to support the re-election of Don Riegle to the U.S. Senate.

___ Yes, I can attend your event. My check is enclosed.

__X__ I cannot attend. However, my check is enclosed.

Please complete the Federal Election Commission information requirements on the reverse side of this card and return to:

Riegle for Senate Committee
P.O. Box 3424
Washington, D.C. 20013

Paid for by the Riegle for Senate Committee

930409340027

93040934028

RONALD O. PERELMAN
36 EAST 63RD STREET
NEW YORK, NY 10021

3191

April 21 19 88

1-231
2-031

PAY TO THE ORDER OF Riegle for Senate Committee $ *1,000.00

*One thousand and no/100---------- DOLLARS

The Chase Manhattan Bank, N.A.
726 Madison Avenue at 64th Street
New York, NY 10021

CHASE

MEMO contribution

Ron Perelman

00

Attachment A

14. McCarthy for Senate

9304093340229

930400934030

RONALD O. PERELMAN
38 EAST 63RD STREET
NEW YORK, NY 10021

3314

May 16 19 RR

1-31
210

PAY TO THE ORDER OF McCarthy for U.S. Senate $ *1,000.00

*One thousand and no/100---------- DOLLARS

The Chase Manhattan Bank, N.A.
726 Madison Avenue at 64th Street
New York, NY 10021

CHASE

MEMO donation

00

Attachment A

15. Californians for Pete Wilson

9304093403 1

930409340332

RONALD O. PERELMAN
38 EAST 63RD STREET
NEW YORK, NY 10021

3411

June 8 19 88

1-231
212

PAY TO THE ORDER OF Californians for Senator Peter Wilson $ *1,000.00

*One thousand and no/100---------- DOLLARS

The Chase Manhattan Bank, N.A.
726 Madison Avenue at 64th Street
New York, NY 10021

CHASE

MEMO contribution

000

Attachment A

16. The Presidential Trust

9304093403 33

930409340034

RONALD O. PERELMAN
58 EAST 63RD STREET
NEW YORK, NY 10021

3488

June 24 RR 19

PAY TO THE ORDER OF The Prudential Trust $ *5,000.00

*Five thousand and no/100 DOLLARS

The Chase Manhattan Bank, N.A.
726 Madison Avenue at 64th Street
New York, NY 10021

CHASE

MEMO contribution

1000

Attachment A

17. Dukakis for President

9304093400335

9304093400336

CHAIRMAN
REVNON

RONALD O. PERELMAN
36 EAST 63RD STREET
NEW YORK, NY 10021

FRONK 3360

June 1 19 88

1-2/210 31

PAY TO THE ORDER OF Dukakis for President $ *1,000.00

*One thousand and no/100---------- DOLLARS

The Chase Manhattan Bank, N.A.
726 Madison Avenue at 64th Street
New York, NY 10021

CHASE

MEMO contribution

Susan Strasberg

00

Attachment B

FEC Printout of
Ronald O. Perelman's Contributions

9304093440037

93040934938

[illegible]	[illegible]	CITY	STATE ZIP	[illegible]	[illegible]
			REPORT TYPE	[illegible]	[illegible]
				DATE	
[illegible], RONALD		NEW YORK	NY 10021		
[illegible]			MID-YEAR REPORT	[illegible]	[illegible]
[illegible] 3442 $137.67 CONTRIBUTION		REVLON		[illegible]	
[illegible], [illegible]		NEW YORK	NY 10021		
[illegible] $137.63 CONTRIBUTION		REVLON	MID YEAR REPORT	GENERAL	1,000
			30JAN87		
[illegible], [illegible]		NEW YORK	NY 10021		
[illegible] COMMITTEE		[illegible]	MID-YEAR REPORT	PRIMARY	1,000
[illegible] $137142 CONTRIBUTION		[illegible]	7APR87		
[illegible], [illegible]		[illegible]	[illegible]		
[illegible] GIBBONS		[illegible]	[illegible]	PRIMARY	1,000
[illegible] $271234 CONTRIBUTION		CONSOLIDATED C[illegible]	17AUG87		
[illegible], RONALD O		[illegible]	[illegible]		
[illegible] FOR SENATE '88			[illegible] REPORT	PRIMARY	1,000
[illegible] $142962 CONTRIBUTION			16JUN87		
[illegible], [illegible] O		NEW [illegible]	[illegible]		
[illegible] FOR CONGRESSMAN BILL GREEN			[illegible] YEAR REPORT	[illegible]	[illegible]
[illegible] $151180 CONTRIBUTION		MAC A[illegible] FORBES [illegible]	15FEB87		
[illegible], [illegible] O		NEW [illegible]	[illegible]		
[illegible] CONGRESSMAN BILL GREEN			[illegible] YEAR REPORT	FOR 1988	
[illegible] $151181 CONTRIBUTION		MAC A[illegible] [illegible]ORKERS [illegible]	30APR87		
[illegible], [illegible] O		NEW YORK	NY 10021		
[illegible] U S SENATE '90			MID-YEAR REPORT	[illegible]	[illegible]
[illegible] $162333 CONTRIBUTION		REVLON GROUP [illegible]	[illegible]		
[illegible], [illegible] O		NEW YORK	NY 10021		
BILL GREEN FOR U S SENATE '90			MID-YEAR REPORT	GENERAL	[illegible]
[illegible] $162323 CONTRIBUTION		REVLON GROUP [illegible]	[illegible]		
[illegible], [illegible] O		NEW YORK	NY 10021		
[illegible] FOR SENATE			APRIL QUARTERLY	PRIMARY	[illegible]
[illegible] $320240 CONTRIBUTION		REVLON GROUP INC	[illegible]		
[illegible], [illegible] O		NEW YORK	NY 10021		
ELIE DAWKINS FOR SENATE			APRIL QUARTERLY	GENERAL	[illegible]
[illegible] $329241 CONTRIBUTION		REVLON GROUP INC	[illegible]		
[illegible], RONALD O		NEW YORK	NY 10021		
[illegible] SENATORIAL CAMPAIGN COMMITTEE			MAY QUARTERLY	PRIMARY	[illegible]
[illegible] $34[illegible] CONTRIBUTION		REVLON GROUP INC	[illegible]		

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9 5 0 4 0 9 3 4 0 1 9

CONTRIBUTOR NAME / RECIPIENT NAME	CITY	STATE ZIP	TYPE OF ELECTION	AMOUNT
OCCUPATION EMPLOYER	TRANSACTION TYPE	REPORT TYPE DATE		
PERELMAN, RONALD O	NEW YORK	NY 10021		
MCCARTHY FOR U S SENATOR		JULY QUARTERLY	PRIMARY	1,000
BRSEN/011.1946 #427451 CONTRIBUTION	MAC ANDREWS & FORBES	20MAY88		
PERELMAN, RONALD O	NEW YORK	NY 10021		
LIGHT U.S. SENATE		JULY QUARTERLY	PRIMARY	1,000
BRSEN/012.0788 #428039 CONTRIBUTION	MACANDREWS & FORBES	29APR88		
PERELMAN, RONALD O	NEW YORK	NY 10021		
CITIZENS FOR ARLEN SPECTER		MID YEAR REPORT	PRIMARY	1,000
BRSEN/012.3214 #463301 CONTRIBUTION	MACANDREWS & FORBES	16MAY88		
PERELMAN, RONALD O	NEW YORK	NY 10021		
DUKAKIS FOR PRESIDENT COMMITTEE COMPLIANCE FUND		YEAR END	GENERAL	1,000
BRSEC/012.0788 #463458 CONTRIBUTION	REVLON INC	30DEC88		
PERELMAN, RONALD O	NEW YORK	NY 10021		
DUKAKIS FOR PRESIDENT COMMITTEE COMPLIANCE FUND		COMP/AMEND	GENERAL	1,000
BRSEC/012.0788 #704801 CONTRIBUTION	REVLON	08DEC88		
PERELMAN, RONALD O	NEW YORK	NY 10021		
DUKAKIS FOR PRESIDENT COMMITTEE, INC		COMP ADJUST AMEND	PRIMARY	1,000
BRSEC/012.0788 #705008 CONTRIBUTION	REVLON	08DEC88		
PERELMAN, RONALD O MR	NEW YORK	NY 10021		
BIDEN FOR PRESIDENT		JULY QUARTERLY	PRIMARY	1,000
BRSEC/012.0788 #044844 CONTRIBUTION	MACANDREWS & FORBES GR	INC 25JUN87		
PERELMAN, RONALD O MR	NEW YORK	NY 10021		
FRIENDS OF GARY HART 1988 INC		JULY QUARTERLY	PRIMARY	1,000
BRSEC/012.0317 #059253 CONTRIBUTION		6MAY87		
PERELMAN, RONALD O MR	NEW YORK	NY 10021		
GEORGE BUSH FOR PRESIDENT, INC		YEAR-END	PRIMARY	500
BRSEC/012.0150. #186111 CONTRIBUTION		27OCT87		
PERELMAN, RONALD O MR	NEW YORK	NY 10021		
GEPHARDT FOR PRESIDENT COMMITTEE INC.		YEAR-END	PRIMARY	1,000
BRSEC/012.0788 #103431 CONTRIBUTION		3NOV87		
PERELMAN, RONALD O MR	NEW YORK	NY 10021		
DOLE FOR PRESIDENT COMMITTEE INC		YEAR-END	PRIMARY	500
BRSEC/012.0987 #174634 CONTRIBUTION		20NOV87		
PERELMAN, RONALD O MR	NEW YORK	NY 10021		
ALBERT GORE JR FOR PRESIDENT COMMITTEE INC.		MAY MONTHLY	PRIMARY	1,000
BRSEC/012.0788 #431413 CONTRIBUTION		31MAY88		

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CONTRIBUTOR/LENDER/TRANSFERER / REPORTING ENTITY / MICROFILM LOCATION / TRANSACTION TYPE	STREET ADDRESS	CITY	STATE ZIP	TYPE OF FILER / REPORT TYPE / DATE	ELECTION	AMOUNT
PERELMAN, RONALD O MR REPUBLICAN NATIONAL COMMITTEE - CONTRIBUTIONS (AKA REPUBLICAN NATIONAL FINANCE COMMITTEE 88FEC/534/4042 #402800 CONTRIBUTION		NEW YORK CITY MACANDREWS & FORBES	NY 10153	JULY QUARTERLY 30JUN88	PRIMARY	5,000
PERELMAN, RONALD O MR CALIFORNIANS FOR PETE WILSON 1994 88SEN/011/1157 #417463 CONTRIBUTION		NEW YORK REVLON INC.	NY 10021	JULY QUARTERLY 27JUN88	GENERAL	1,000
PERELMAN, RONALD O MR RIEGLE FOR SENATE IN '88 COMMITTEE 88SEN/012/3285 #420685 CONTRIBUTION		NEW YORK MACANDREWS & FORBES	NY 10021	JULY QUARTERLY 9MAY88	PRIMARY	1,000

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Attachment C

Affidavit of Richard E. Halperin

9304093404041

BEFORE THE FEDERAL ELECTION COMMISSION

STATE OF NEW YORK)
: ss.: MUR 3104
COUNTY OF NEW YORK)

AFFIDAVIT OF RICHARD E. HALPERIN

Richard E. Halperin, being duly sworn, deposes and says, that

1. I am Senior Vice President of MacAndrews & Forbes Group Incorporated, and Special Counsel to Ronald O. Perelman, Chairman of MacAndrews & Forbes Group Incorporated. I have been in this position since February 1984. From September 1979 to January 1984, I served as Administrative Assistant to the Attorney General of New York State and as an Assistant Attorney General in the Executive Bureau.

2. As Senior Vice President and Special Counsel to the Chairman of MacAndrews & Forbes Group Incorporated, I have broad responsibilities involving the interests of Mr. Perelman, individually, MacAndrews and Forbes Group Incorporated, and its subsidiaries. For example, I chair charitable foundations funded by Mr. Perelman and the corporations, I am responsible for the real estate holdings of Mr. Perelman and the corporations, and although a small part of my overall duties, I am solely

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responsible for responding to solicitations for political contributions addressed to Ronald O. Perelman, individually, MacAndrews & Forbes Group Incorporated, and its subsidiaries. It is my responsibility to decide whether to contribute, how much to contribute, and from what source, i.e., Ronald Perelman's personal funds or corporate funds.

3. Every Spring, beginning in 1986, I have authorized contributions, on behalf of Ronald O. Perelman, to the Republican National Committee ("RNC") Presidential Dinner. In the Spring of 1988, however, a contribution I thought was the annual contribution to the RNC Presidential dinner was, in fact, a contribution to the Presidential Trust, which was featured as a dinner with then Vice-President and Mrs. George Bush.

4. Prior to 1988, contributions made to the Presidential Dinner were made either to the RNC's Building Fund or an account that accepted other than federal funds. In fact, upon review of our records, I authorized the 1986 and 1987 contributions to the Presidential Dinner, on Mr. Perelman's behalf, from corporate funds. The RNC apparently deposited those contributions in accounts that permitted the use of corporate funds.

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5. In 1988, the solicitation for the Presidential Trust requested that the contribution be made from individual funds, not corporate funds. That did not indicate to me that the contribution would count against Mr. Perelman's annual federal contribution limit because I had recalled receiving a Democratic National Committee ("DNC") solicitation that requested individual funds even though the contribution was for a non-federal account. As was the case with the DNC, I believed that the RNC was requesting non-federal contributions from non-corporate sources in the presidential election year.

Richard E. Halperin

Sworn to and Subscribed before me
this 25th day of September, 1990.

KAREN A. DeMECO
Notary Public, State of New York
No. 41-4669592
Qualified in Queens County
Commission Expires March 30, 19 91

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Attachment D

Refund Check

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REPUBLICAN NATIONAL FINANCE COMMITTEE
310 FIRST STREET, SE.
WASHINGTON, D.C. 20003

2494

April 30 19 90

PAY TO THE ORDER OF RONALD PERELMAN $ 5,000.00***

FIVE THOUSAND AND 00/100

DOLLARS

Bank of Virginia
1756 South Jefferson Davis Highway
Arlington, Virginia 22202

FOR 1988 REFUND

Pat Heyn

⑈0000 2494⑈ ⑆056004089⑆ 651⑈ 7220643⑈

Attachment E

Congressional Quarterly Report
On Senator Biden's Withdrawal
From The Presidential Race

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Second Presidential Dropout:

Character Issue Strikes Again, Forcing Biden to Halt His Bid

When measuring how presidential candidates are faring in the long period before the first public vote in Iowa, it has been customary to look at public opinion polls, big-name endorsements and fund-raising success. But the stunning collapse of the second Democratic candidacy this year — that of Sen. Joseph R. Biden Jr. — makes it clear that the more nebulous area of personal character has emerged as a key bench mark in measuring candidates.

Former Democratic Sen. Gary Hart's campaign quickly unraveled in May when he failed to answer satisfactorily questions about sexual impropriety. Biden was unable to withstand charges of plagiarism that surfaced in mid-September, just as he opened the Senate Judiciary Committee hearings on President Reagan's Supreme Court nominee Robert H. Bork. Biden withdrew from the race in a statement delivered on Capitol Hill Sept. 23.

Sen. Joseph R. Biden Jr.

No Bedrock

In the traditional measurements of early campaign progress, Hart and Biden had both done reasonably well. When his candidacy collapsed in May, Hart was running atop the Democratic field; he had high name recognition in the polls and was in the process of building a large national organization. *(Background, Weekly Report p. 923)*

When he folded his campaign, Biden had raised more money (nearly $3.3 million by the end of the last reporting period in June) and had more cash on hand ($1.8 million) than any other Democrat except Massachusetts Gov. Michael S. Dukakis. After a slow start, Biden was also showing progress in recent polls in Iowa.

But neither Biden nor Hart felt he could keep his campaign afloat in the face of serious questions about his personal ethics.

Candidates with a large and loyal personal following might not have been forced to close up shop. If, for instance, similar questions regarding personal character were raised against the Rev. Jesse L. Jackson or the Rev. Pat Robertson, both probably would have been able to rally substantial support, since they have constituencies that are passionately loyal not only to them, but also to a cause.

Biden and Hart were perceived as less cause-oriented candidates; when the ground started slipping under them, they had no bedrock of support on which to stand.

A Political Joe Isuzu

As the Bork hearings opened, Biden was buffeted by charges of plagiarism that ranged from a law school paper in 1965 to some of his recent presidential campaign speeches. At a Capitol Hill news conference Sept. 17, he sought to defuse the controversy. He admitted that he had plagiarized a law review article while a student at the Syracuse University Law School and had mistakenly quoted some modern-day political figures without attribution in some of his presidential campaign speeches. But Biden emphasized that he was in the race to stay. *(Background, Weekly Report p. 2256)*

That public resolve lasted for only six days. When confronted by a new report that he had embellished his academic record when speaking at a coffee klatch in New Hampshire earlier this year, he was forced to admit more inaccuracies.

With this added to his earlier admissions, Biden appeared in danger of being widely viewed as a political version of Joe Isuzu, the grinning character in a current TV advertisement whose outrageous exaggerations about his product are accompanied by subtitles that set the record straight.

Biden campaign officials emphasized that Biden's misstatements covered no more than 15 minutes of a career that spanned 15 years in national politics, but the candidate admitted that "the exaggerated shadow of those mistakes has begun to obscure the essence of my candidacy and the essence of Joe Biden."

In his Sept. 23 withdrawal statement, the 44-year-old Biden outlined two basic choices — to concentrate on rebuilding his image in an effort to get his presidential campaign back on track; or to focus his attention on the Bork hearings, where he faces the demanding task of chairing the proceedings in a fair way while at the same time opposing Bork's nomination. "There will be other opportunities for me to campaign for president," he concluded, "but there will not be many other opportunities for me to influence President Reagan's choice on the Supreme Court."

Plenty More Hats

While Biden was taking his hat out of the ring, several other candidates were preparing to throw theirs in. Robertson will formally launch his bid for the Republican nomination Oct. 1. He is to be followed into the GOP race by Vice President George Bush, who has scheduled his formal announcement for Oct. 12.

Jackson is to enter the Democratic race officially on Oct. 10. Meanwhile, Rep. Patricia Schroeder of Colorado has indicated she will announce Sept. 28 whether she also is running for the Democratic nomination. ■

—By Rhodes Cook

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Attachment F

Sample Reports Analysis
Division Internal Referral Sheet

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JJ 507

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Attachment 2

NOVEMBER 23, 1979

MEMORANDUM

TO: OFFICE OF GENERAL COUNSEL

ATTENTION: LESTER SCALL

THROUGH: ORLANDO B. POTTER A.L. for O.A.P.

FROM: THOMAS J. HASELHORST

SUBJECT: INDIVIDUALS EXCEEDING $25,000 YEARLY LIMIT.

Attached are MUR updates to seven of nine RAD referrals concerning individuals who exceeded the $25,000 yearly limits. These updates contain contributions made in 1977 and 1979 to candidates or candidate committees which may be attributed to the 1978 limitations.

In the case of an individual residing in a community property state the pages of the G Index showing all contributions from the contributor and his/her spouse have been attached.

All contributions from an individual which aggregate in excess of $1,000 to a Federal candidate have been reviewed for election designation. Unless otherwise noted, no contributions aggregating in excess of $1,000 were designated to a particular election.

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U

REPORTS ANALYSIS REFERRAL UPDATE

*ORIGIN: RAD

DATE 11-23-79

ANALYST Mary Luppi

TO: Office of General Counsel
ATTENTION: Lester Scall

TEAM CHIEF Peggy Sims

COMPLIANCE REVIEW Carroll Bowen

THROUGH: STAFF DIRECTOR

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS

MUR No. 1059

DATE OF ORIGINAL REFERRAL 10/22/79

**PURPOSE: INFORMATION

Contributions made by H. E. Chiles during the 1977 and 1979 calendar years but designated for the 1978 primary and general elections.

1977 itemized contributions (by committee).	Att. #1
1979 itemized contributions (by committee).	Att. #1
Supporting schedules for 1977 contributions.	Att. #2
Supporting schedules for 1979 contributions.	Att. #3
G Index-Section 1, 1977-78.	Att. #4
G Index- Section 1, 1979.	Att. #5
Independent Expenditure made against Jim Wright (TX/12).	Att. #6

OUTCOME: (if applicable)

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*Commission unit which initiated original Referral (e.g. AUDIT/RAD/OGC).
**INFORMATION, or RESULTS OF RAD ACTION, as appropriate.

RESULTS OF REVIEW

Contributions made in 1977:	
Helms for Senate Committee	$250
Re-Elect Senator Baker Committee	1,250 *
Friends of George Roche	250
Friends of Jim Collins	250
Friends of Gillis Long	500
Berman for Congress - 78	1,000
Contributions made in 1979:	
Friends of Roger Jepsen	500
Bell for Senate Committee	1,000
Swigert Senate Committee	300
Gramm for Congress	1,000
Gearhart for Congress	1,000
Wes Mowery for Congress	1,000
1977 AND 1979 CONTRIBUTIONS TO CANDIDATES AND PCCS DESIGNATED FOR THE 1978 ELECTIONS. TOTAL:	8.300
TOTAL CONTRIBUTIONS FOR 1978 AS PREVIOUSLY LISTED ON RAD REFERRAL #9L-174:	26,250
TOTAL CONTRIBUTIONS BY H. E. CHILES FOR THE 1978 ELECTIONS:	34,550
Addition of 1977 contribution Phil Gramm for Congress Committee	1,000
	$35,550

* An RFAI will be sent for election designation to the Re-Elect Senator Baker Committee concerning the $1,250 contributed by H. E. Chiles.

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Attachment G

The Moynihan Committee's
1988 Solicitation Material

9304093405 53

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9 3 0 4 0 9 3 4 0 5 5

Monday

May 23, 1988

Daniel Patrick Moynihan

New York's Senior Senator

will announce

his candidacy

for a

third term

in the

United States Senate

PLEASE COME!

CHEER, WAVE BANNERS, SING

AND CELEBRATE!

at the

ANNOUNCEMENT PARTY

and

FUN-RAISING RALLY

IN SUPPORT OF PAT'S RE-ELECTION

5:30 - 7:30 PM

Empire State Ballroom

Grand Hyatt Hotel

42nd Street and Park Avenue

New York City

Contribution card enclosed

OGC 8884

LAW OFFICES
MANATT, PHELPS & PHILLIPS
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

TELEPHONE (202) 463-4300
FAX (202) 463-4394
(202) 463-4395

1200 NEW HAMPSHIRE AVENUE, N.W.
SUITE 200
WASHINGTON, D.C. 20036

LOS ANGELES
11355 WEST OLYMPIC BOULEVARD
LOS ANGELES, CALIFORNIA 90064
(213) 312-4000

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 DEC -7 PM 4:09

December 7, 1990

Lawrence M. Noble, Esq.
General Counsel
Federal Election Commission
999 E Street, N.W.
6th Floor
Washington, D.C. 20463

Re: MUR 3161, Ira Riklis

Dear Mr. Noble:

This constitutes the response of our client, Ira Riklis, in the above-captioned MUR. The Federal Election Commission received a complaint alleging that Mr. Riklis violated 2 U.S.C. § 441a(a)(3) of the Federal Election Campaign Act of 1971, as amended ("Act"), by exceeding his 1988 aggregate contribution limitation. The violation alleged in the complaint is identical to that alleged in the Commission's Factual and Legal Analysis in MUR 3104, to which Mr. Riklis previously responded on September 17, 1990. No new, different or additional allegations are made by complainant. In fact, the factual basis for the alleged violation in this complaint is the very same Los Angeles Times newspaper article which was the sole basis for the Commission's earlier MUR.

Because the Commission currently has two open MURs with identical factual bases and alleged violations, respondent requests that both MURs immediately be merged into a single proceeding. Such action is consistent with the Commission's past actions and is the sole way in which to ensure the expeditious and equitable resolution of this matter.

Moreover, it is unfair and unduly burdensome to ask Mr. Riklis to respond continually each time some complainant wishes to file a copy of the same newspaper article. For that reason, we hereby incorporate our detailed response to the Commission's reason to believe determination in MUR 3104 as our response to the complaint in this matter (copy attached). In short, Mr. Riklis, in a sworn affidavit, states that he fully believed that the contribution made to the "Presidential Trust" was for non-federal, i.e., soft money, electoral purposes. He, in no way, intended that money to assist the presidential or other federal election. As argued in our earlier response, given this clear indication of donative

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intent, Mr. Riklis should not be held responsible for the Republican party's contrary use of his money.

For further details of our response and Mr. Riklis' sworn statement, please refer to the enclosed documents. As indicated above, we respectfully request that MUR 3161 be merged into MUR 3104, so that this matter may be concluded as expeditiously as possible.[1/]

Sincerely,

Eric F. Kleinfeld
Manatt, Phelps & Phillips

Attachment

cc: Ira Riklis

9304093400 57

CRANESPOINT CREST

1/ As in MUR 3104, respondent respectfully requests that the Commission take no further action and close the file herein, based on our previously detailed response. Alternatively, should the Commission not decide to close these matters, respondent renews his request to pursue pre-probable cause conciliation, but requests that it be done in a single MUR.

LAW OFFICES
MANATT, PHELPS & PHILLIPS
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
1200 NEW HAMPSHIRE AVENUE, N.W.
SUITE 200
WASHINGTON, D.C. 20036

TELEPHONE (202) 463-4300
FAX (202) 463-4394
(202) 463-4395

LOS ANGELES
11355 WEST OLYMPIC BOULEVARD
LOS ANGELES, CALIFORNIA 90064
(213) 312-4000

90 SEP 17 P1:3:19

September 17, 1990

Ms. Fran Hagan
Office of General Counsel
Federal Election Commission
999 E Street, N.W.
6th Floor
Washington, D.C. 20463

Re: MUR 3104, Ira Riklis

Dear Fran:

Enclosed please find a copy of the response on behalf of our client Ira Riklis in MUR 3104. Should you need any additional information, please do not hesitate to contact me.

Sincerely,

Eric F. Kleinfeld
Manatt, Phelps & Phillips

Enclosure

2304093400 58

LAW OFFICES
MANATT, PHELPS & PHILLIPS
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
1200 NEW HAMPSHIRE AVENUE, N.W.
SUITE 200
WASHINGTON, D.C. 20036

TELEPHONE (202) 463-4300
FAX (202) 463-4394
(202) 463-4395

LOS ANGELES
11355 WEST OLYMPIC BOULEVARD
LOS ANGELES, CALIFORNIA 90064
(213) 312-4000

September 17, 1990

Lawrence M. Noble, Esq.
General Counsel
Federal Election Commission
999 E Street, N.W.
6th Floor
Washington, D.C. 20463

Re: MUR 3104, Ira Riklis

Dear Mr. Noble:

This constitutes the response of our client, Ira Riklis, in the above-captioned MUR. The Federal Election Commission ("FEC" or "Commission"), on the basis of an article in the Los Angeles Times, found reason to believe that Mr. Riklis violated 2 U.S.C. § 441a(a)(3) of the Federal Election Campaign Act ("Act") by exceeding his 1988 annual aggregate contribution limitation. For the reasons stated below, respondent respectfully requests that the Commission take no further action in this MUR and close the file.

Attached to this response, as you requested, is a list of all contributions made by respondent to candidates for federal office in connection with the 1988 election. Copies of checks are also included. As you will note, Mr. Riklis' aggregate 1988 candidate contributions were $7,500. In addition to those candidate contributions, he made contributions to federal political committees (PACs) totalling $7,000 in 1988. Thus, Mr. Riklis' total federal candidate and PAC contributions for the 1988 election was $14,500.

In late October 1988, Mr. Riklis also made a $15,000 contribution to the "Presidential Trust," a fundraising vehicle established by the Republican National Committee ("RNC"). While Mr. Riklis was fully aware that this contribution was going to the Republican Party, he was unaware that the contribution was in any way connected with a federal election. See Affidavit of Ira D. Riklis, ¶ 5. In fact, respondent specifically intended and assumed that this contribution was to be used solely for non-

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federal election purposes.[1/] Id., ¶ 5. When the contribution was solicited, there was no indication to Mr. Riklis that any of the funds were to be used in connection with a federal election.

Because Mr. Riklis was told to make out the check to the Presidential Trust, he did not know into what type of account the RNC would actually deposit it. Moreover, the contribution was made immediately prior to the 1988 general election, during a period when the presidential candidates could not accept private contributions. This, when combined with the instructions to Mr. Riklis to make the check out to the Presidential Trust, led him to believe that he was making a non-federal donation to a non-federal account of the RNC.[2/] Id., ¶ 5. This assumption was apparently commonly made by donors to the Presidential Trust; more than just respondent believed this to be a non-federal account.[3/] See Los Angeles Times article.

After having made the RNC contribution, Mr. Riklis assumed it was deposited into a non-federal account and used in connection with non-federal elections or other non-federal party activity. Respondent initially learned that this assumption may have been incorrect through the Los Angeles Times' investigation in early 1990, some one and one-half years after the contribution was made. Immediately after learning that the RNC had not deposited his money into a non-federal account, Mr. Riklis sought a refund. The RNC responded by refunding $5,000 to Mr. Riklis on May 2, 1990, two weeks after the Los Angeles Times story.

Thus, the facts make completely clear that respondent did not intend to exceed his aggregate limit, and that he did not believe he had done so. The Commission has long recognized the dispositive nature of a contributor's state of mind when facts concerning the making of a contribution are in dispute. For example, a contribution which a contributor believes is allocated/designated to a particular election cannot be reallocated by the recipient on a whim, merely to satisfy the Act's requirement. Here, the contributor believed without question, that he was making a non-federal contribution. Despite that belief, the RNC misdeposited the money into an apparently federal account. Thus, the Commission

---

1/ This was previously reported in the Los Angeles Times article on which the Commission bases its finding.

2/ Additionally, then-President Reagan was not a candidate, further leading to confusion over the purposes of the "Presidential Trust."

3/ While the details of the solicitation are unclear, contributors may have not been fully informed as to the character of the Presidential Trust.

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is proceeding against a contributor who, at the very least, is a victim of a misdeposit by the RNC, and more likely, was simply not informed that his money would be used contrary to his wishes. The obvious confusion which occurred over the purpose of Mr. Riklis' RNC contribution should serve as the primary basis for no further action by the Commission.

Moreover, Mr. Riklis believes strongly that he made only $14,500 in federal contributions in connection with the 1988 election.[4/] This amount is well within the limitation of 2 U.S.C. § 441a(a)(3). During the 1987-1988 election cycle, the time period for which the aggregate must be calculated, Mr. Riklis had no idea that he was at, or even near, his aggregate limit, since he had some $9,500 remaining to contribute. Non-federal contributions, including those made to political parties for non-federal purposes, fall outside the limitation of 2 U.S.C. § 441a(a)(3). Where a contributor believes that he is making a non-federal contribution to a political party, which is commonly known to maintain a non-federal account and to be raising money for that purpose, his contribution should not be applied to the $25,000 aggregate limit, notwithstanding the recipient's deposit. Based on his sworn belief, Mr. Riklis' RNC contribution should not be included in his 1988 aggregate limit, and on that basis, the Commission should take no further action.

However, assuming arguendo, a federal purpose to Mr. Riklis' RNC contribution, the prompt refund, prior to any Commission action, makes his 1988 aggregate total $24,500, within the limit of 2 U.S.C. § 441a(a)(3). Given this immediate remedial action, which was made necessary because the RNC did not act in accordance with its contributor's wishes, no further action is justified.

Accordingly, for the reasons stated above, and on the basis of Ira Riklis' sworn affidavit, respondent respectfully requests that the Commission take no further action and close the file in MUR 3104. Should the Commission decline to close this matter, respondent requests the opportunity to pursue conciliation prior to a Commission finding of probable cause.

Sincerely,

Eric F. Kleinfeld

William C. Oldaker
Eric F. Kleinfeld
Manatt, Phelps & Phillips

Attachments

4/ This figure is the sum of all federal candidate and PAC contributions and excludes the RNC donation.

9304093406 1

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
	)	MUR 3104
	)	
Ira D. Riklis	)	

Affidavit of Ira D. Riklis

I, Ira D. Riklis, declare as follows:

1. The list attached to my response is a true and accurate list of all contributions I made to federal candidates in connection with the 1988 election. The total of those federal contributions was $7,500.

2. I also made two contributions to federal PACs in 1988, totalling $7,000.

3. In late 1988, I was approached concerning a possible contribution to the Republican Party. I was instructed to make my check out to the "Presidential Trust."

4. At that time, I was aware that President Reagan was not a candidate for re-election, and thus, neither he, nor anyone one on his behalf, could receive contributions for the presidential election. I was also aware at that time of large "soft money" donations being made by various individuals to the national political parties.

5. Based on my knowledge in paragraph 4 above, I believed that, when making a check out to the "Presidential Trust," I was making a soft money donation. I fully intended my contribution to the Republican Party to be a soft money donation.

6. I did not intend for my contribution to the Republican Party to be used in connection with any federal candidate or

9304093406 2

election. I did not know that the Presidential Trust was involved in federal elections. In addition, I have no knowledge as to what purpose my contribution was put.

7. I did not include my Republican Party donation in my 1988 annual limit, because I did not believe that soft money donations needed to be included. I had no intent to violate the law.

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

Ira D. Riklis

State of New York)
) SS
County of NEW YORK)

I, ANTHONY N. LICALSI, a Notary Public, hereby certify that on the 12TH day of September, 1990, there personally appeared before me Ira D. Riklis, who acknowledged signing the foregoing document and that the statements contained therein are true.

Notary Public

My Commission expires _____, 19____.

ANTHONY N. LI CALSI
Notary Public, State of New York
No. 60-7842307
Qualified in Westchester County
Certificate Filed in New York County
Commission Expires April 30, 1992

9304093400663

Contributions to Federal Candidates in Connection with the 1988 Election

Date	Recipient	Amount
January 30, 1987	Danforth for Senate	$1,000
February 24, 1987	Biden for President	1,000
December 8, 1987	Burdick Campaign Committee	500
February 22, 1988	Hecht Re-election Committee	1,000 primary
February 22, 1988	Hecht Re-election Committee	1,000 general
April 18, 1988	Jack Buechner for Congress	1,000 primary
April 18, 1988	Jack Buechner for Congress	1,000 general
September 13, 1988	Lautenberg Committee	1,000
	Total	$7,500

9304093400564

IRA D. RIKLIS
515 MADISON AVENUE
NEW YORK, N.Y. 10022

1249

January 30 87

15-35
540

PAY TO THE ORDER OF Committee for Re-Elect Senator Danforth $ 1,000.00

One Thousand and----------no cents---------- DOLLARS

AMERICAN SECURITY BANK, N.A.
Corporate Banking
1501 Pennsylvania Avenue, N.W.
Washington, D.C. 20013

NOT NEGOTIABLE

IRA D. RIKLIS

DELUXE - FORM DVC-3 V-2

SECURITY CO

1/30/87	Political contribution	$1,000.00
	Solicited by Seymour Zises	

IRA D. RIKLIS
DIANA J. RIKLIS
1020 PARK AVENUE
NEW YORK, NEW YORK 10028

15

February 24 87

15
5

PAY TO THE ORDER OF Biden for President $1,000.0

One Thousand and----------no cents----------DOLL

AMERICAN SECURITY BANK, N.A.
Georgetown Facility
3301 Pennsylvania Avenue, N.W.
Washington, D.C. 20010

NOT NEGOTIABLE

IRA D. RIKLIS
DIANA J. RIKLIS

DELUXE - FORM BVC-3 V-2

DATE	DESCRIPTION	AMOUNT
2/24/87	Political contribution	$1,000.(

930409340 66

IRA D. RIKLIS
DIANA J. RIKLIS
1020 PARK AVENUE
NEW YORK, NEW YORK 10028

1950

December 8, 87

15-55
540

PAY TO THE ORDER OF Burdick Campaign Committee $ 500.00

Five Hundred ---------- .00/100 DOLLARS

AMERICAN SECURITY BANK, N.A.
Corporate Banking
1501 Pennsylvania Avenue, N.W.
Washington, D.C. 20013

NOT NEGOTIABLE

IRA D. RIKLIS
DIANA J. RIKLIS

DELUXE - FORM DVC-3 V-2

DATE	DESCRIPTION	AMOUNT
12/8/87	Political Contribution	$500.00

IRA D. RIELS
DIANA J. RIELS
[redacted] PARK AVENUE
NEW YORK, NEW YORK 10028

2009

February 22, 88

PAY TO THE ORDER OF Hecht Re-Election Committee $ 2,000.00

Two Thousand ---------- .00/100 DOLLARS

[redacted] NATIONAL BANK

NOT NEGOTIABLE

IRA D. RIELS
DIANA J. RIELS

DELUXE - FORM DVO-3 V-2

DATE	DESCRIPTION	AMOUNT
2/22/88	Polictical Contribution - Primary	$2,000.00

IRA D. ELLIS
DIANA J. ELLIS
1120 PARK AVENUE
NEW YORK, NEW YORK 10128

2020

February 22, 88

PAY TO THE ORDER OF Hecht Re-Election Committee $ 2,000.00

Two Thousand ---------- .00/100 DOLLARS

NOT NEGOTIABLE

IRA D. ELLIS
DIANA J. ELLIS

DELUXE - FORM DVC3 V2

DATE	DESCRIPTION	AMOUNT
2/22/88	Political Contribution - General Election	$2,000.00

IRA D. RIGLIS
DIANA J. RIGLIS
1020 PARK AVENUE
NEW YORK, NEW YORK 10028

2152

April 18, 88

16-62-340

PAY TO THE ORDER OF Buechner For Congress $ 2,000.00

Two Thousand ---------- .00/100 DOLLARS

[illegible] BANK, N.A.

NOT NEGOTIABLE

IRA D. RIGLIS
DIANA J. RIGLIS

DELUXE - FORM DVC-3 V 2

DATE	DESCRIPTION	AMOUNT
4/18/88	Political Contribution	$2,000.00

IRA D. RUKLIS
533 MADISON AVENUE
NEW YORK, N.Y. 10022

1427

September 13, 88

PAY TO THE ORDER OF Lautenberg Committee $1,000.00

One Thousand ---------- .00/100 DOLLARS

AMERICAN SECURITY BANK, N.A.

NOT NEGOTIABLE

IRA D. RUKLIS

DELUXE - FORM DVC-3 V-2

	DESCRIPTION	AMOUNT
9/13/88	Political Contribution for Senator Frank Lautenberg	$1,000.00

IRA D. RIKLIS
565 MADISON AVENUE
NEW YORK, N.Y. 10022

1437

October 18, 88

PAY TO THE ORDER OF Presidential Trust $15,000.00

Fifteen Thousand ---------- .00/100 DOLLARS

AMERICAN SECURITY BANK, N.A.
Connecticut Building
1001 Pennsylvania Avenue, N.W.
Washington, D.C. 20004

NOT NEGOTIABLE

IRA D. RIKLIS

DELUXE - FORM DVC-3 V-2

DATE	DESCRIPTION	AMOUNT
10/18/88	Political Contribution	$15,000.00

REPUBLICAN NATIONAL FINANCE COMMITTEE
310 FIRST STREET, SE.
WASHINGTON, D.C. 20003

2497

April 30 19 90

PAY TO THE ORDER OF IRA RICKLIS

$ ***5,000.00***

FIVE THOUSAND AND 00/100

DOLLARS

Bank of Virginia
1716 South Jefferson Davis Highway
Arlington, Virginia 22202

FOR 1988 REFUND

⑈0000 2497⑈ ⑆056004089⑆ 651-722064 3⑈

930409340 73

06C9797

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM
91 JAN 11 AM 10:58

KIRKLAND & ELLIS

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

200 East Randolph Drive
Chicago, Illinois 60601

312 861-2000

Facsimile:
312 861-2200

Gregg A. Garmisa
To Call Writer Direct:
312 861-2193

January 9, 1991

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
91 JAN 11 PM 12:05

Frances B. Hagan
Staff Attorney
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

MUR
3161

Dear Fran:

I trust things are settling down in the office and hope that the new year starts out well. To reiterate, following our January 8 conversation, Mr. Simmons remains ready to begin conciliation negotiations as soon as the Commission is prepared. Also, I would like to confirm my understanding from that discussion that the Commission will provide written assurance that Mr. Simmons will not be subject to any double-jeopardy problems resulting from Common Cause's mirror image complaint of the Commission's pre-existing investigation. I look forward to hearing from you soon.

Sincerely,

Gregg A. Garmisa

GAG:dg

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RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT
91 JAN 14 PM 12:27

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

SENSITIVE

FIRST GENERAL COUNSEL'S REPORT

MUR 3161
DATE COMPLAINT RECEIVED
BY OGC: November 2, 1990
DATE OF NOTIFICATION TO
RESPONDENTS: November 14, 1990
STAFF MEMBER: Frances B. Hagan

COMPLAINANT: Common Cause

RESPONDENTS: Dwayne O. Andreas
Dorothy Inez Andreas
Henry Kravis
Raymond Kravis
Ronald O. Perelman
Ira Riklis
Harold C. Simmons

RELEVANT STATUTES: 2 U.S.C. § 441a(a)(3)
2 U.S.C. § 441a(a)(1)(A)
2 U.S.C. § 441a(a)(1)(C)
2 U.S.C. § 441a(f)

INTERNAL REPORTS CHECKED: Disclosure reports; FEC indexes

FEDERAL AGENCIES CHECKED: None

93040934075

I. GENERATION OF MATTER

On November 2, 1990, a complaint was submitted by Common Cause, a non-profit membership corporation organized to promote "open, honest and effective government and political representation." Based on an article in the Los Angeles Times and on FEC contributor indexes, Common Cause alleges that seven individuals violated 2 U.S.C. § 441a(a)(3) by making contributions in excess of the $25,000 annual limit attributable to calendar year 1988.

II. ANALYSIS

2 U.S.C. § 441a(a)(3) limits total contributions by an individual in any calendar year to $25,000. 11 C.F.R. § 110.5(c)(2) states that any contribution to a candidate or authorized committee with respect to a particular election made in a non-election year shall be considered to be made during the calendar year in which such election is held.

The Commissioners requested that the Office of the General Counsel prepare a report on the allegations contained in the same April 18, 1990, article from the Los Angeles Times. As a result of that report, the Commission, on August 3, 1990, found reason to believe that ten individuals named in the article, including the seven mentioned by Common Cause, violated 2 U.S.C. § 441a(a)(3). At the same time, the Commission found reason to believe that two of the ten individuals violated 2 U.S.C. § 441a(a)(1)(A); and two violated 2 U.S.C. § 441a(a)(1)(C).

The respondents in MUR 3104 have submitted responses to that complaint, and are similarly responding to MUR 3161. Because the basis for the Common Cause complaint (MUR 3161) is identical to MUR 3104, and the same respondents are involved in the investigation already underway in MUR 3104, this Office recommends that the matters be merged. Three respondents named in the newspaper article and in MUR 3104 are not named in MUR 3161, and are not privy to the Common Cause complaint.[1]

9304093407 6

1. Common Cause did not allege a violation by the following respondents in MUR 3104: Caroline Rose Hunt, Meshulam Riklis, and Donald Trump.

Therefore, we recommend that the merged matter retain the name MUR 3104.

III. **RECOMMENDATIONS**

1. Merge MUR 3161 with MUR 3104.

2. Approve the appropriate letters.

Lawrence M. Noble
General Counsel

Date 1/14/91

BY: Lois G. Lerner
Associate General Counsel

9304093340077

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Dwayne O. Andreas;	)	
Dorothy Inez Andreas;	)	
Henry Kravis;	)	MUR 3161
Raymond Kravis;	)	
Ronald O. Perelman;	)	
Ira Riklis;	)	
Harold C. Simmons.	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on January 16, 1991, the Commission decided by a vote of 6-0 to take the following actions in MUR 3161:

1. Merge MUR 3161 with MUR 3104.

2. Approve the appropriate letters, as recommended in the General Counsel's Report dated January 14, 1991.

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

Attest:

Jan. 17, 1991
Date

Marjorie W. Emmons
Secretary of the Commission

Received in the Secretariat: Mon., Jan. 14, 1991 12:27 p.m.
Circulated to the Commission: Mon., Jan. 14, 1991 4:00 p.m.
Deadline for vote: Wed., Jan. 16, 1991 4:00 p.m.

dr

9304093340078

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 18, 1991

Mr. and Mrs. Dwayne O. Andreas
9909 Collins Avenue
Bal Harbor
Miami Beach, FL 33154

RE: MUR 3104 (formerly 3161)
Dwayne O. Andreas
Dorothy Inez Andreas

Dear Mr. and Mrs. Andreas:

On November 14, 1990, the Federal Election Commission notified you 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 each of you at that time.

Because the issues in the Common Cause complaint (MUR 3161) are identical to those in the ongoing MUR 3104, the Commission, on January 16, 1991, determined to merge MUR 3161 into MUR 3104, to be called MUR 3104.

If you have any questions, please contact Frances B. Hagan, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,

John Warren McGarry

John Warren McGarry
Chairman

93040934079

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 18, 1991

Kenneth S. Levine, Esquire
Paul Sullivan, Esquire
Wunder, Ryan, Cannon & Thelen
1615 L Street, N.W., Suite 650
Washington, D.C. 20036

RE: MUR 3104 (formerly 3161)
Henry Kravis

Dear Mr. Levine and Mr. Sullivan:

On November 14, 1990, the Federal Election Commission notified your client 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 client at that time.

Because the issues in the Common Cause complaint (MUR 3161) are identical to those in the ongoing MUR 3104, the Commission, on January 16, 1991, determined to merge MUR 3161 into MUR 3104, to be called MUR 3104.

If you have any questions, please contact Frances B. Hagan, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,

John Warren McGarry

John Warren McGarry
Chairman

93040934080

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 18, 1991

Kenneth S. Levine, Esquire
Paul Sullivan, Esquire
Wunder, Ryan, Cannon & Thelen
1615 L Street, N.W., Suite 650
Washington, D.C. 20036

RE: MUR 3104 (formerly 3161)
Raymond Kravis

Dear Mr. Levine and Mr. Sullivan:

On November 14, 1990, the Federal Election Commission notified your client 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 client at that time.

Because the issues in the Common Cause complaint (MUR 3161) are identical to those in the ongoing MUR 3104, the Commission, on January 16, 1991, determined to merge MUR 3161 into MUR 3104, to be called MUR 3104.

If you have any questions, please contact Frances B. Hagan, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,

John Warren McGarry

John Warren McGarry
Chairman

9304093408 1

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 18, 1991

Kenneth A. Gross, Esquire
Skadden, Arps, Slate, Meagher & Flom
1440 New York Avenue, N.W.
Washington, D.C. 20005-2107

RE: MUR 3104 (formerly 3161)
Ronald O. Perlman

Dear Mr. Gross:

On November 14, 1990, the Federal Election Commission notified your client 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 client at that time.

Because the issues in the Common Cause complaint (MUR 3161) are identical to those in the ongoing MUR 3104, the Commission, on January 16, 1991, determined to merge MUR 3161 into MUR 3104, to be called MUR 3104.

If you have any questions, please contact Frances B. Hagan, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,

John Warren McGarry

John Warren McGarry
Chairman

9304093400882

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 18, 1991

Eric F. Kleinfeld, Esquire
Manatt, Phelps & Phillips
1200 New Hampshire Ave., N.W.
Suite 200
Washington, D.C. 20036

RE: MUR 3104 (formerly 3161)
Ira Riklis

Dear Mr. Kleinfeld:

On November 14, 1990, the Federal Election Commission notified your client 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 client at that time.

Because the issues in the Common Cause complaint (MUR 3161) are identical to those in the ongoing MUR 3104, the Commission, on January 16, 1991, determined to merge MUR 3161 into MUR 3104, to be called MUR 3104.

If you have any questions, please contact Frances B. Hagan, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,

John Warren McGarry

John Warren McGarry
Chairman

9304093400883

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 18, 1991

Gregg A. Garmisa, Esquire
Kirkland & Ellis
200 East Randolph Drive
Chicago, IL 60601

RE: MUR 3104 (formerly 3161)
Harold Simmons

Dear Mr. Garmisa:

On November 14, 1990, the Federal Election Commission notified your client 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 client at that time.

Because the issues in the Common Cause complaint (MUR 3161) are identical to those in the ongoing MUR 3104, the Commission, on January 16, 1991, determined to merge MUR 3161 into MUR 3104, to be called MUR 3104.

If you have any questions, please contact Frances B. Hagan, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,

John Warren McGarry

John Warren McGarry
Chairman

9304093400084

06-C 1109

100 Crescent Court
Suite 1700
Dallas, Texas 75201
(214) 871-8400

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

91 MAY 13 AM 9:11

May 8, 1991

VIA FACSIMILE 202/376-5280

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

91 MAY 13 PM 2:38

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

Attention: Frances B. Hagan

Re: MUR 3104; Caroline Rose Hunt

Dear Ms. Hagan:

In response to your call yesterday about Ms. Hunt's $2,000 check dated February 23, 1987, not designating that the total amount should have been split between the primary and general elections enclosed is a copy of the check as delivered to the Bentsen Committee. I had earlier sent to you only a copy of the cancelled check rather than the entire document delivered to the Bentsen campaign that included the detachable portion of the check that designated $1,000 for the primary election and $1,000 for the general election.

Very truly yours,

C. Jedson Nau

C. Jedson Nau, Attorney

CJN/cac

Enclosure

9304093400885

THIS VOUCHER IS IN FULL SETTLEMENT OF ITEMS BELOW

0001827

VENDOR NO.	INVOICE DATE	VENDOR INVOICE NUMBER	VOUCHER REFERENCE	GROSS AMOUNT	DISCOUNT	NET AMOUNT
Political contribution designated one-half for use in the Primary Election and one-half for use in the General Election						2,000.00

InterFirst 32-1 1110

CAROLINE HUNT SCHOELLKOPF

(SEPERATE)
DALLAS, TEXAS

0001827

VOUCHER NO.	CHECK NUMBER	DATE
	00001827	2-23-87

AMOUNT OF CHECK
$**2,000.00**

930409

PAY TO THE ORDER OF:

EXACTLY $ 2000 AND 00 CTS
CAROLINE HUNT SCHOELLKOPF
(SEPERATE)

Senator Lloyd Bentsen Election Committee

930409

08C 1146

SKADDEN, ARPS, SLATE, MEAGHER & FLOM
1440 NEW YORK AVENUE, N.W.
WASHINGTON, D.C. 20005-2107
(202) 371-7000

FAX (202) 393 5760
DIRECT DIAL
(202) 371-

May 14, 1991

BY HAND

Ms. Frances B. Hagan
Office of General Counsel
Federal Election Commission
999 E Street, Northwest
Washington, D.C. 20463

Re: MUR 3161
Ronald O. Perelman

Dear Ms. Hagan:

Per your request, enclosed are additional documents concerning the above referenced matter.

Let me know if you need anything else.

Sincerely,

Kenneth A. Gross

Enclosures

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
91 MAY 14 PM 3:43

9304093400087

1991 - RNC

2304093408888

Guy Vander Jagt
Chairman
National Republican
Congressional Committee

Robert H. Michel
Republican Leader of the House

GEORGE BUSH
THE PRESIDENT'S DINNER

Howard H. Baker, Jr.
Dinner Chairman

Phil Gramm
Chairman
National Republican
Senatorial Committee

Bob Dole
Republican Leader of the Senate

FACT SHEET

DATE:	Thursday, June 13, 1991
LOCATION:	Washington Convention Center Washington, DC
TIME:	6:00 p.m. Reception 7:00 p.m. Dinner
TICKET PRICE:	INDIVIDUAL AND PAC CONTRIBUTIONS: $ 1,500 per person $15,000 per table of ten TRUST CONTRIBUTIONS: $ 2,000 per person $20,000 per table of ten
HOSTS:	The President and Mrs. Bush The Vice President and Mrs. Quayle The Republican Members of the U.S. Senate and the U.S. House of Representatives
DINNER CHAIRMAN:	Howard H. Baker, Jr.
OFFICE ADDRESS:	The President's Dinner 1101 17th Street, N.W., Suite 808 Washington, DC 20036 Phone: (202) 659-1771 Fax: (202) 833-2491

9304093340089

CHECKS SHOULD BE MADE PAYABLE TO:

The President's Dinner - Individual and PAC contributions

The President's Dinner Trust - Corporate funds and individual or PAC contributions exceeding the federal limits

Paid for by The President's Dinner Committee. Proceeds will be divided evenly between the National Republican Senatorial Committee and the National Republican Congressional Committee for the benefit of Republican candidates. Donations may be designated or reallocated in order to comply with federal limits on political contributions. Contributors to The President's Dinner are not deductible for federal income

GEORGE BUSH
THE PRESIDENT'S DINNER

Guy Vander Jagt
Chairman
National Republican Congressional Committee

Robert H. Michel
Republican Leader of the House

Howard H. Baker, Jr.
Dinner Chairman

Phil Gramm
Chairman
National Republican Senatorial Committee

Bob Dole
Republican Leader of the Senate

1991 BENEFITS FOR TABLEBUYERS

- Private Reception hosted by President and Mrs. Bush - 2 people.

OR

Cabinet Reception hosted by the President's Cabinet and Ranking Republican Members - 2 people.

- Luncheon at the Vice President's Residence hosted by Vice President and Mrs. Quayle - 2 people.

- Senate-House Leadership Breakfast hosted by Senator Bob Dole and Congressman Bob Michel - 2 people.

- Option to request a Member of the House of Representatives to complete the table of ten. With purchase of a second table, option to request one Senator or one Senior Administration Official.

9304093400900

(202) 659-1771 (202) 833-2491 (FAX)
1101 17th Street, N.W. ✦ Suite 808 ✦ Washington, D.C. 20036

Paid for by The President's Dinner Committee. Proceeds will be divided evenly between the National Republican Senatorial Committee and the National Republican Congressional Committee for the benefit of Republican candidates. Donations may be designated or reallocated in order to comply with federal limits on political contributions. Contributions to The President's Dinner are not deductible for federal income tax purposes.

BENEFITS FOR 1991 TABLEBUYERS AND FUNDRAISERS

TABLEBUYERS

- Private Reception hosted by President and Mrs. Bush - 2 people.
  OR
  Cabinet Reception hosted by the President's Cabinet and Ranking Republican Members - 2 people.
- Luncheon at the Vice President's Residence hosted by Vice President and Mrs. Quayle - 2 people.
- Senate-House Leadership Breakfast hosted by Senator Bob Dole and Congressman Bob Michel - 2 people.
- Option to request a Member of the House of Representatives to complete the table of ten. With purchase of a second table, option to request one Senator or one Senior Administration Official.

FUNDRAISERS - TWO TABLES

- Private Reception hosted by President and Mrs. Bush - 2 people.
  OR
  Cabinet Reception hosted by the President's Cabinet and Ranking Republican Members - 2 people.
- Luncheon at the Vice President's Residence hosted by Vice President and Mrs. Quayle - 2 people.
- Reception with Senator Bob Dole at U.S. Capitol - 2 people.
- Senate-House Leadership Breakfast hosted by Senator Bob Dole and Congressman Bob Michel - 2 people.

FUNDRAISERS - $75,000 AND ABOVE

- Photo Opportunity with President Bush - 1 person.
- Private Reception hosted by President and Mrs. Bush - 2 people.
  OR
  Cabinet Reception hosted by the President's Cabinet and Ranking Republican Members - 2 people.
- Luncheon at the Vice President's Residence hosted by Vice President and Mrs. Quayle - 2 people.
- Reception with Senator Bob Dole at U.S. Capitol - 2 people.
- Senate-House Leadership Breakfast hosted by Senator Bob Dole and Congressman Bob Michel - 2 people.

TOP FUNDRAISERS

- Opportunity to be seated at a headtable with the President or Vice President based on ticket sales.

Note: Attendance at all events is limited.

9304093402091

THE 1991 PRESIDENT'S DINNER

CONTRIBUTION GUIDELINES

INDIVIDUAL CONTRIBUTIONS

Individual and PAC contributions to The President's Dinner are used to directly support Republican candidates for the U.S. Senate and House of Representatives. The net proceeds from the Dinner will be divided evenly between the National Republican Senatorial Committee and the National Republican Congressional Committee.

- Up to $25,000 may be contributed per individual to The President's Dinner for candidate support (this must be non-corporate).
- The spouse of a contributor can also give $25,000 in non-corporate funds to The President's Dinner for candidate support.
- An unlimited sum may be contributed by an individual to The President's Dinner - Trust.

PAC CONTRIBUTIONS

- Up to $30,000 may be contributed by a Political Action Committee to The President's Dinner for candidate support.
- An unlimited sum may be contributed by a PAC to The President's Dinner - Trust.

CORPORATE CONTRIBUTIONS

Corporate contributions must be made payable to The President's Dinner - Trust. These contributions are placed into a separate bank account and are not used to directly support candidates for federal office. A portion of the funds will be used, however, to help defray the cost associated with planning The Dinner.

Contributions to The Dinner are not tax-deductible.

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TRUST CONTRIBUTIONS

Contributions to The President's Dinner Trust will be utilized by the National Republican Congressional Committee and the National Republican Senatorial Committee in one or more of the following ways:

1) To fund the non-federal portion of generic Republican party building activities, such as get-out-the-vote and voter registration efforts, in those states which allow the use of corporate contributions for such purposes.

2) To pay for the non-federal share of the administrative and fundraising expenses incurred by The President's Dinner Committee.

3) To pay off the existing mortgages of the NRSC and NRCC as well as to fund future capital improvements to these same buildings.

93040934093

THE 1991 PRESIDENT'S DINNER

FUNDRAISER TALKING POINTS

- The President's Dinner is the largest and most successful annual fundraiser in the history of the Republican Party. The proceeds, which in 1990 reached nearly $7 million, are split equally between the National Republican Congressional Committee and the National Republican Senatorial Committee to fund Republican candidates for the U.S. House and Senate.

- In 1992, next to the campaign for the White House, the Senate and House campaigns will have the greatest impact on the social and economic direction this country will take in the years ahead.

- Top priority is being given to candidate recruitment, solid voter education programs and strong voter registration efforts in the coming months. Investing in these three programs now will pay off on Election Day in 1992.

- A successful candidate recruitment program is as essential to victory as any last-minute polls, media or get-out-the-vote efforts.

- In the 1992 elections there will be 35 Senate seats up for grabs, the most opportunities we've had in more than a decade to win additional Republican seats. There are 19 Democrats presently seeking reelection and an open Democrat seat in California. The key to winning will be the candidates we can recruit in the coming months to carry our party's standard.

- As a result of population shifts recorded in the 1990 Census, the Democrats will lose 10 to 12 Congressional seats in the predominantly Democrat areas of the Northeast. To replace those districts, new ones will be created in the South and West, where the Republican Party has been gaining strength for a decade. The result is an unprecedented number of open seats in the 1992 election.

- We need a U.S. Congress that is firmly behind George Bush to implement the programs and policies we elected him to carry out.

- Our Republican incumbents and challengers will once again be counting heavily on The President's Dinner to put together strong, viable campaigns.

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9304093 4095

003986

"THE PRESIDENT'S
DINNER TRUST"

04/17/91 INVOICE DATE: 4/16/91 $20,000.00

REVLON

No. 003986

04 17 91 2017

20,000.00

TWENTY THOUSAND DOLLARS AND ----------00/100

"THE PRESIDENT'S DINNER TRUST"

1990 - RNC

9304093400996

GEORGE BUSH

THE PRESIDENTS DINNER

May 17, 1990

Mr. Ronald O. Perelman
Revlon Group Incorporated
767 5th Avenue, 49th Floor
New York, NY 10153

Dear Ronald,

A short note to thank you for participating in The 1990 President's Dinner.

Your commitment toward making this event a major success, means that President Bush can look forward to increased support for his programs and policies as we add to our Republican strength in both the U.S. House of Representatives and the U.S. Senate this November.

The President's Dinner serves as a way for all of us to say "thank you" to both our President and First Lady, and your generosity will ensure that this year's tribute is one of the greatest of all.

I have made arrangements to have your tickets available for pick-up at the Will Call desk, Lobby 2, in the Washington Convention Center (900 9th Street, N.W.) on the following dates and times:

Monday, June 11	1:00 PM - 8:00 PM
Tuesday, June 12	10:00 PM - 8:00 PM

Again, thanks for your special efforts. We look forward to seeing you on June 12th.

Sincerely,

Howard Baker

Howard H. Baker, Jr.
Dinner Chairman

COPIER 7021

(202) 659-1771
1101 17th Street, N.W. ✦ Suite 808 ✦ Washington, D.C. 20036

Paid for by The President's Dinner Committee. Proceeds will be divided evenly between the National Republican Senatorial Committee and the National Republican Congressional Committee for the benefit of Republican candidates. Donations may be designated or reallocated in order to comply with federal limits on political contributions. Contributions to The President's Dinner are not deductible for federal income tax purposes.

9304093340097

GEORGE BUSH

July 17, 1990

Mr. Ronald Peralman
Revlon Group Incorporated
767 5th Avenue, 49th Floor
New York, NY 10153

Dear Mr. Peralman:

Barbara and I would like to thank you for your personal efforts in making the 1990 President's Dinner an overwhelming success.

While we traditionally enjoy this annual gathering of friends, this year's added birthday celebration was especially meaningful to me.

Thanks to your generous support, our candidates for the U.S. House of Representatives and the U.S. Senate will have more of the resources necessary to add to our Republican strength in the Congress -- strength that will work for all Americans.

Again, thank you for your continued commitment and support.

Sincerely,

George Bush

930409340998

(202) 659-1771
1101 17th Street, N.W. ✦ Suite 808 ✦ Washington, D.C. 20036

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THE 1990 PRESIDENT'S DINNER

BENEFITS FOR TABLEBUYERS

- Option to request a Member of the House of Representatives to complete the table of ten. With purchase of a second table, option to request one Senator or one Senior Administration Official.

- Senate-House Leadership Breakfast hosted by Senator Bob Dole and Congressman Bob Michel - 2 people.

- Private White House Reception hosted by President and Mrs. Bush - 2 people.

OR

Cabinet Reception hosted by the President's Cabinet and Ranking Republican Members - 2 people.

9304009340099

Guy Vander Jagt
Chairman
National Republican
Congressional Committee

Robert H. Michel
Republican Leader of the House

GEORGE BUSH
THE PRESIDENT'S DINNER

Howard H. Baker, Jr.
Dinner Chairman

Don Nickles
Chairman
National Republican
Senatorial Committee

Bob Dole
Republican Leader of the Senate

Leadership Committee

Howard P. Allen
Dwayne O. Andreas
Gregory H. Barnhill
Joseph C. Canizaro
Charles T. Condy
Lodwrick M. Cook
Alec P. Courtelis
Walter J. Ganzi, Jr.
Rudolph W. Giuliani
James A. Haslam, II
Bobby Holt
Henry A. Kissinger
Drew Lewis
Carl Lindner
James T. Lynn
Jack McDonald
David H. Murdock
Admiral Daniel J. Murphy
Dean O'Hare
T. Boone Pickens
Joe M. Rodgers
John W. Rollins, Sr.
Frederick W. Smith
Alex G. Spanos
Jackson T. Stephens, Sr.
Donald Stone
John C. Whitehead
Ted Welch
Frank G. Zarb

930409341 00

September 7, 1990

Mr. Ronald Perelman
Revlon Group Incorporated
767 5th Avenue, 49th Floor
New York, New York 10153

Dear Mr. Perelman:

Because you played such an active part in the success of this year's President's Dinner, I thought you would be interested in reviewing the enclosed newsletter containing an update on some of the most pivotal campaigns of 1990.

As you know, the success of our candidates in November's elections are vital to our continued efforts to increase our party's strength in both the Senate and the U.S. House of Representatives.

The good news is that right now, a number of our Senate and House challengers stand on the verge of victory. Whether it's Pat Saiki in Hawaii looking to put that state's Senate seat in the Republican column for the first time, or Dick Waterfield in Texas trying to retake a traditional GOP District, all of our candidates are working overtime to win -- and win big on November 6th.

Again, thank you for your continued support of our President and our party. As Chairman of the 1991 President's Dinner, I would like to assure you that your contribution has already helped all of our candidates and I look forward to working with you in the coming months.

Sincerely,

Howard Baker

Howard H. Baker, Jr.

(202) 659-1771
1101 17th Street, N.W. ✦ Suite 808 ✦ Washington, D.C. 20036

Paid for by The President's Dinner Committee. Proceeds will be divided evenly between the National Republican Senatorial Committee and the National Republican Congressional Committee for the benefit of Republican candidates. Donations may be designated or reallocated in order to comply with federal limits on political contributions. Contributions to The President's Dinner are not deductible for federal income tax purposes.

REVLON
GROUP INCORPORATED

21 EAST 63RD STREET
NEW YORK, N.Y. 10021

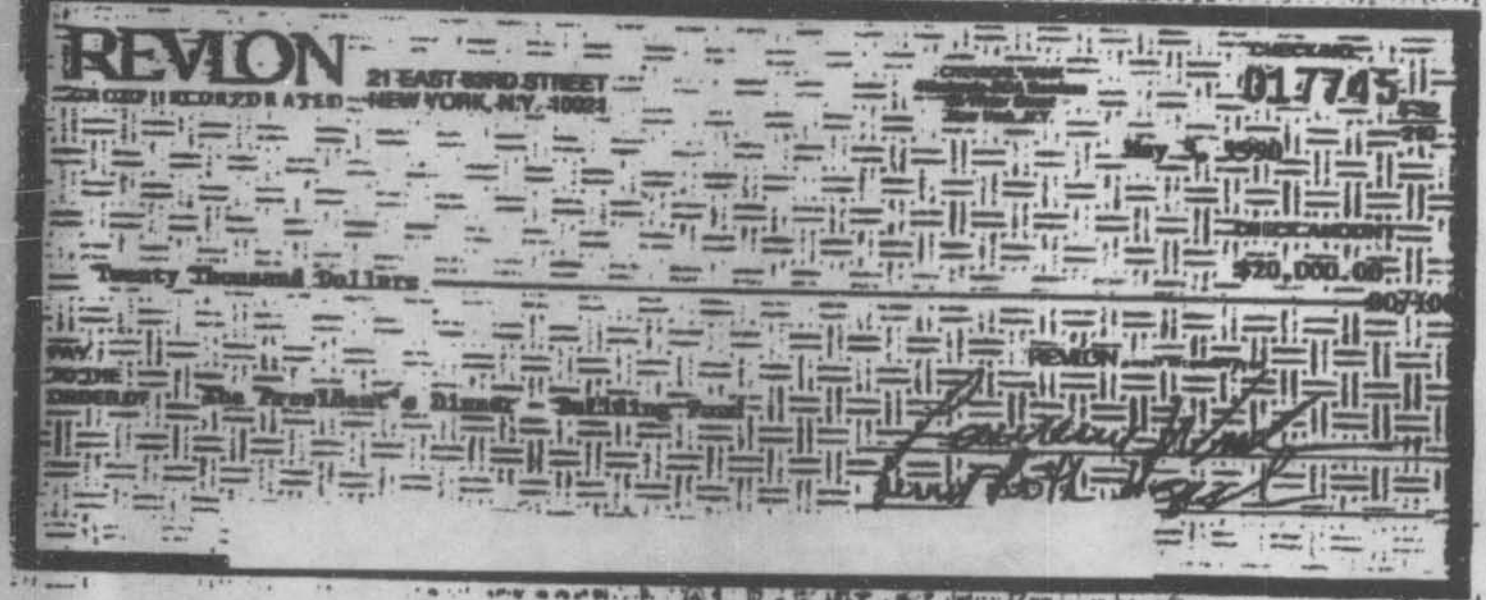
CHECK NO.
017745

May 3, 1990

The President's Dinner - Building Fund

Amount $20,000.00

DETACH AND RETAIN THIS STATEMENT



SEN- 5-14-91 12:13PM ; 2125725058-
BY:MacAndrews 48th F. ; TELECOPY DEPT:# 3

1989 - RNC

9304093411102

The President's Dinner
Leadership

Dinner Chairman

David H. Murdock

Co-Chairmen

Dwayne O. Andreas
Gregory Hurd Barnhill
Geoffrey T. Boisi
Joseph C. Canizaro
Victor Ganzi
W. G. Champion Mitchell
T. Boone Pickens
Jay S. Reibel
Peter Semopoulos
Jonathan Tisch

National Co-Chairmen

Lawrence E. Bathgate II
Ledwrick Cook
Alec P. Courtelis
Walter J. Ganzi, Jr.
Martin G. Hamberger
Drew Lewis
Carl Lindner
Jack McDonald
William Moss
Joe M. Rodgers
Alex G. Spanos

Committee Chairmen

Don Nickles
Chairman
National Republican
Senatorial Committee

Bob Dole
Republican Leader of the Senate

Guy Vander Jagt
Chairman
National Republican
Congressional Committee

Robert H. Michel
Republican Leader of the House

9304093411O3

President and Mrs. George Herbert Walker Bush

Vice President and Mrs. James Danforth Quayle

and

The Republican Members of the United States Senate
and House of Representatives

request the pleasure of your company

at

The President's Dinner

on

Wednesday, the fourteenth of June
Nineteen hundred and eighty-nine

Washington Convention Center
900 Ninth Street, Northwest
Washington, D.C.

Cocktail Reception
Six-thirty p.m.
R.s.v.p. by enclosed card

Dinner
Seven-thirty p.m.
Black Tie

The President's Dinner
Leadership

Dinner Chairman

David H. Murdock

Co-Chairmen

Dwayne O. Andreas
Gregory Hind Ramhill
Geoffrey T. Boisi
Joseph C. Canizaro
Victor Ganzi
W. G. Champion Mitchell
T. Boone Pickens
Ray S. Reibel
Peter Scrugoubes
Jonathan Tisch

National Co Chairmen

Lawrence E. Rathgate II
Frederick Cook
Alec P. Courtelis
Walter J. Ganzl, Jr.
Martin G. Hamberger
Drew Lewis
Carl Lindner
Jack McDonald
William Moss
Joe M. Rodgers
Alex G. Spanos

Committee Chairmen

Don Nickles
Chairman
National Republican
Senatorial Committee

Bob Dole
Republican Leader of the Senate

Guy Vander Jagt
Chairman
National Republican
Congressional Committee

Robert H. Michel
Republican Leader of the House

9304093411O4

President and Mrs. George Herbert Walker Bush
Vice President and Mrs. James Danforth Quayle
and
The Republican Members of the United States Senate
and House of Representatives
request the pleasure of your company
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The President's Dinner
on
Wednesday, the fourteenth of June
Nineteen hundred and eighty-nine

Washington Convention Center
900 Ninth Street, Northwest
Washington, D.C.

Cocktail Reception
Six-thirty p.m.
R.s.v.p. by enclosed card

Dinner
Seven-thirty p.m.
Black Tie

★★★ THE ★★★
PRESIDENT'S DINNER

9 3 0 4 0 9 3 4 1 0 5

★ ★ ★ ★ ★ ★

Please complete the following information:

Name

Name of corporation or PAC affiliate organization

Address

City/state/zip code

( ) ( )

Business telephone Home telephone

Name of individual to contact regarding ticket distribution

The Federal Election Law requires we ask the following information:

Occupation

Employer

Paid for by The President's Dinner Committee. Proceeds will be divided evenly between the National Republican Senatorial Committee and the National Republican Congressional Committee to assist Republican candidates in their election efforts. Donations may be designated or reallocated to comply with federal laws on political contributions.

Corporate, labor union, or personal contributions may be given, without limit, to The President's Dinner Building Fund, but cannot be used for direct candidate support. Checks should be made payable to "The President's Dinner Building Fund."

Since The President's Dinner is a joint fundraising committee, federal law permits qualified multi-candidate Political Action Committees to contribute up to $10,000 for candidate support (this contribution attributable made to the National Republican Senatorial Committee and the National Republican Congressional Committee in 1989). The annual contribution limit on such contributions are not deductible for federal income tax purposes.

MD
81

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THE PRESIDENT'S DINNER

1101 17th Street, N.W. Suite 808
Washington, D.C. 20036
(202) 659-1771

☐ **Yes,** I will attend The President's Dinner on Wednesday, June 14 at the Washington Convention Center. Enclosed is my contribution in the amount of $_____. Please make my reservation for the following:

_____ ticket(s) at $1,500

_____ table(s) of ten at $15,000

Each tablebuyer will receive a complimentary invitation admitting two individuals to one of the events listed below. Attendance will be limited at both receptions. Please indicate your choice by checking the appropriate space below.

☐ A private White House reception hosted by President and Mrs. Bush

☐ An exclusive Cabinet Reception

☐ Sorry, but I am unable to attend The President's Dinner this year. However, I have enclosed my maximum contribution in the amount of $_____ to help elect Republican candidates to the U.S. Senate and House of Representatives.

Seating will be assigned according to order of response.

☐ Special handicapped access will be needed for myself or one of my guests.

Please make checks payable to "The President's Dinner."

THE PRESIDENT'S DINNER
1101 17th Street, N.W.
Suite 808
Washington, D.C. 20036

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* * * * * *

Please complete the following information:

Name

Name of corporation or PAC affiliate organization

Address

City/state/zip code

( ) ( )

Business telephone Home telephone

Name of individual to contact regarding ticket distribution

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Since The President's Dinner is a joint fundraising committee, federal law permits qualified multi-candidate Political Action Committees to contribute up to $30,000 for candidate support (less contributions already made to the National Republican Senatorial Committee and the National Republican Congressional Committee in 1989). The current contribution limit to each Committee is $15,000.

Contributions are not deductible for federal income tax purposes.

MD
JT

9 3 0 4 0 9 3 4 1 0 8

THE PRESIDENT'S DINNER
LEADERSHIP

Dinner Chairman
David H. Murdock

National Co-Chairmen	Co-Chairmen
Lawrence E. Bathgate II	Dwayne O. Andreas
Lodwrick Cook	Gregory Hurd Barnhill
Alec P. Courtelis	Geoffrey T. Boisi
Walter J. Ganzi, Jr.	Joseph C. Canizaro
Martin G. Hamberger	Victor Ganzi
Drew Lewis	W. G. Champion Mitchell
Carl Lindner	T. Boone Pickens
Jack McDonald	Jay S. Reibel
William Moss	Peter Senopoulos
Joe M. Rodgers	Jonathan Tisch
Alex G. Spanos	

Don Nickles
Chairman
National Republican
Senatorial Committee

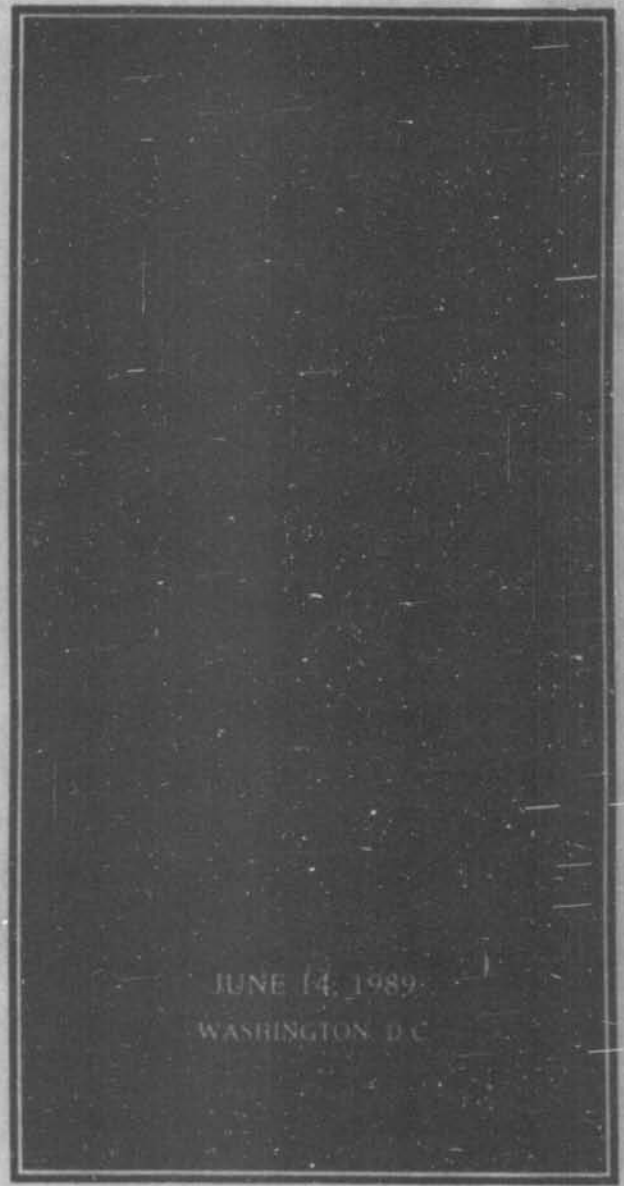
Bob Dole
Republican Leader
of the Senate

Guy Vander Jagt
Chairman
National Republican
Congressional Committee

Robert H. Michel
Republican Leader
of the House

For reservations and information, please contact:
The President's Dinner
1101 17th Street, N.W., Suite 808
Washington, D.C. 20036
(202) 659-1771

Paid for by The President's Dinner Committee.
Contributions are not deductible for federal income tax purposes.



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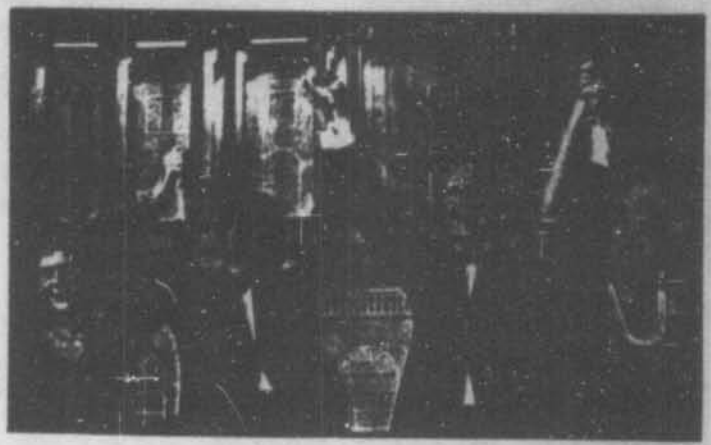
THE 1989 PRESIDENT'S DINNER



The tradition of The President's Dinner will continue this year on June 14 as we honor our new President and First Lady—George and Barbara Bush. Your support of The President's Dinner will be seen as a vote of confidence to President Bush as he begins to lead our country into the new decade ahead.

The legacy left behind for President Bush is one of a strong and prosperous nation, and he is committed to institutionalizing this second American revolution of hope and opportunity. Let us dedicate ourselves to his ideals of a kinder and gentler America—an honest pledge to our common mission of progress.

Together, by supporting The President's Dinner, we are making a vow to help elect a working coalition of Republicans in the U.S. Congress to work with President Bush for a stronger America.

The President's Dinner is the single largest fundraising event in the history of the Republican Party. Every dollar raised will be directed towards regaining control of the U.S. Senate and increasing our forces in the U.S. House of Representatives. It is our pledge of support to our President and his Congress, and to the future of America.

Join us in honoring President and Mrs. Bush with your support and participation in The 1989 President's Dinner.

★ ★

"I think we're all gathered here tonight because we share a common goal—electing more Republicans to the House and Senate. And believe me, nobody in this room wants that more than I do . . . I want it because it would be good for this country and for all the ideals we believe in as Republicans."

George Bush
The President's Dinner
May 11, 1988

President & Mrs. George Herbert Walker Bush

Vice President & Mrs. James Danforth Quayle

and the

Republican Members of the United States Senate
and House of Representatives

cordially invite you to attend

The 1989 President's Dinner

on

Wednesday, June 14, 1989

at

The Washington Convention Center
900 Ninth Street, N.W.
Washington, D.C.

6:30 p.m. Cocktail Reception — $1,500 per person
7:30 p.m. Dinner — $15,000 per table of ten
Black Tie

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FUNDRAISING BENEFITS

TABLEBUYERS
$15,000

An invitation for two individuals to attend one of the following special events:

A private White House reception hosted by President and Mrs. Bush

OR

An exclusive Cabinet Reception

AND

Option of a Republican VIP leader to complete your table of ten

An individual, corporation, or Political Action Committee may purchase a table for $15,000 and receive the Tablebuyer benefits of The President's Dinner. Tablebuyers are responsible for the purchase of two VIP tickets to complete their table of ten.

VICE CHAIRMEN
$30,000

An invitation for two individuals to attend three special events, including:

A luncheon with Vice President and Mrs. Quayle at their residence in Washington, D.C.

A special reception with Bob Dole, Republican Leader of the Senate, hosted in his U.S. Capitol office

The Republican Leadership Breakfast in the U.S. Capitol

VICE CHAIRMEN
$45,000

All benefits of a $30,000 Vice Chairman, along with an invitation for two individuals to attend:

A private White House reception hosted by President and Mrs. Bush

OR

An exclusive Cabinet Reception

CHAIRMEN
$75,000 and up

All benefits of a $30,000 Vice Chairman along with an invitation for two individuals to attend:

A private White House reception hosted by President and Mrs. Bush

AND

A private photo opportunity with President Bush for one person

PLEASE NOTE: Attendance at the private White House reception and the exclusive Cabinet Reception is limited. Reservations will be confirmed based on the actual date of receipt of contributions.

GEORGE BUSH

May 1, 1989

Mr. Ronald O. Perelman
A.M.K. Acquisition Corporation
36 East 63rd Street
New York, New York 10021

Dear Mr. Perelman:

You recently received a very special invitation to join Barbara and me at The President's Dinner on June 14 in Washington, D.C.

Over the past years, The President's Dinner has played an important part in raising the necessary funds for Republican Senate and House candidates across the country. In fact, there is no other fundraising event that focuses exclusively on the goal of regaining control of the U.S. Senate and ultimately the House of Representatives.

I hope you will take a few moments today and consider becoming an active part of The 1989 President's Dinner.

Barbara and I look forward to seeing you in Washington on June 14.

Sincerely,

George Bush

930409341111

THE PRESIDENT'S DINNER
1101 17th Street, N.W., Suite 808 Washington, D.C. 20036

Paid for by The President's Dinner Committee. Proceeds will be divided evenly between the National Republican Senatorial Committee and the National Republican Congressional Committee for the benefit of Republican candidates. Donations may be designated to a candidate in order to comply with federal laws on political contributions. Contributions to The President's Dinner are not deductible for federal income tax purposes.

THE PRESIDENT'S DINNER
1101 17th Street, N.W., Suite 808
Washington, D.C. 20036
(202) 659-1771

Mr. Ronald O. Perelman
A.M.K. Acquisition Corporation
36 East 63rd Street
New York, NY 10021

☐ YES, I plan to attend The 1989 President's Dinner on Wednesday, June 14, in Washington, D.C.

Enclosed is my maximum contribution in the amount of $ _____ for

____ ticket(s) at $1,500 each

____ table(s) of ten at $15,000 each

Each Tablebuyer will receive a complimentary invitation admitting two individuals to one of the events listed below. Attendance will be limited at both receptions. Please indicate your choice by checking the appropriate space below.

☐ A private White House reception hosted by The President and Mrs Bush

☐ An exclusive Cabinet Reception

☐ Sorry, but I am unable to attend The President's Dinner this year. However, I have enclosed my maximum contribution in the amount of $ _____ to help elect Republican candidates to the U.S. Senate and House of Representatives.

Seating will be assigned according to order of response

☐ Special handicapped access will be needed for myself or one of my guests.

Please make checks payable to "The President's Dinner."

8921

BUSINESS REPLY MAIL
FIRST CLASS PERMIT NO. 17492 WASHINGTON, D.C.

The President's Dinner
1101 17th Street, N.W.
Suite 808
Washington, D.C. 20077-6472

NO POSTAGE NECESSARY IF MAILED IN THE UNITED STATES

9304093411 2

Please help The President's Dinner update our files by making any necessary changes in your name or address as listed on the front. Thank you!

Name

Title/Organization (if applicable)

Street Address

City/State/Zip Code

( ) ( )

Business Telephone Home Telephone

Name of individual to contact regarding ticket distribution (if applicable)

Federal election law requires we ask the following information

Occupation

Employer

Paid for by The President's Dinner Committee. Proceeds will be divided evenly between the National Republican Senatorial Committee and the National Republican Congressional Committee to assist Republican candidates in their election efforts. Donations may be designated or earmarked to comply with federal limits on political contributions.

Since The President's Dinner is a joint fundraising committee, federal law gives qualified multi-candidate Political Action Committees (PACs) the opportunity to contribute up to $15,000 to candidates' support (per contribution) which goes to the National Republican Senatorial Committee and the National Republican Congressional Committee in 1988. The annual contribution limit to each Committee is $15,000.

Corporate, labor union or personal contributions may be given without limit to The President's Dinner Building Fund but cannot be used for direct candidate support. Checks should be made payable to: The President's Dinner Building Fund.

Contributions are not deductible for federal income tax purposes.

930409341113

9304093411 4

REVLON
GROUP INCORPORATED

21 EAST 63RD STREET
NEW YORK, N.Y. 10021

CHECK NO.
011688

May 25, 1989

The Presidente Dinner Building Fund

Amount - $15,000.00

DETACH AND RETAIN THIS STATEMENT

REVLON
GROUP INCORPORATED

21 EAST 63RD STREET
NEW YORK, N.Y. 10021

CHEMICAL BANK
Worldwide Data Services
55 Water Street
New York, N.Y.

CHECK NO.
011688

1-110
210

May 25, 1989

CHECK AMOUNT
$15,000.00

Fifteen Thousand Dollars and ---------- 00/100

PAY
TO THE
ORDER OF The Presidente Dinner Building Fund

REVLON

[redacted]

[redacted]

SENT BY:MacAndrews 49th F. ; 5-16-91 ;12:12PM ; 2125726350-
-ELECOPY DEPT'M 2

1988 - RNC

9304093411 5

REPUBLICAN NATIONAL FINANCE COMMITTEE
310 FIRST STREET SOUTHEAST WASHINGTON, D.C. 20003 202-863-8720

LAWRENCE E. BATHGATE, II
CHAIRMAN

July 5, 1988

Mr. Ronald O. Perelman
MacAndrews and Forbes Holdings Inc.
36 East 63rd Street
New York, New York 10021

Dear Ronnie:

Thursday's Presidential Trust event in New York City broke all records, raising over $2.3 million for Vice President George Bush.

Without your efforts this would not have been possible.

On behalf of the Vice President and all of us at the Republican National Committee, thank you for your leadership and support.

Most cordially,

Lawrence E. Bathgate, II

LEB:kmr

Ron-
Thanks

this letter only material relating to Trust which I'm entitled to see

930409341116

PAID FOR BY THE REPUBLICAN NATIONAL COMMITTEE

ALFONSE D'AMATO
UNITED STATES SENATOR

April 22, 1988

Mr. Ronald O. Perelman
A.M.K. Acquisition Corporation
36 East 63rd Street
New York, New York 10021

Dear Ronald,

You recently received an invitation and a letter from President Reagan asking you to attend a very special event. I, too, am anxious to see you at The President's Dinner in Washington on May 11.

The President's Dinner is very important to me and to New York. 100% of the proceeds from this annual event go directly to supporting our 1988 election efforts on behalf of Republican candidates for the U.S. Senate and the U.S. House of Representatives.

I know how important the money raised from the Dinner can be, because my campaign, as well as those of other Republican Senators and Representatives from New York, have greatly benefitted from this event.

In 1988, our state's thirty-four House of Representatives seats will be up for reelection. The President's Dinner will provide the key source of funding to make these winning campaigns for our Republican candidates.

That's why it's so important that you attend on May 11th, and why I'm writing you today.

The President's Dinner is a celebration of the commitment that put this country on the road to recovery, and that will take a strong and proud America into the twenty-first century.

It also provides a unique opportunity for you to meet all the Republican leaders of our nation, while thanking President and Mrs. Reagan for the eight years of leadership and friendship they have given this country.

I'm counting on you to work with me to continue to strengthen the Republican party in New York by supporting The President's Dinner. Even if you can't be with us, you can still make a difference by sending a contribution.

Let's show the President that New York supports his vision for the future of this country.

Sincerely,

Alfonse D'Amato

Alfonse D'Amato

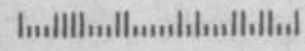
PAID FOR BY THE PRESIDENT'S DINNER COMMITTEE
CONTRIBUTIONS ARE NOT TAX DEDUCTIBLE

930409341117

9304093411 8

ALFONSE D'AMATO

Mr. Ronald O. Perelman
A.M.K. Acquisition Corporation
36 East 63rd Street
New York, New York 10021



The President's Dinner
1101 17TH STREET, N.W., SUITE 808
WASHINGTON, D.C. 20036

1988 PRESIDENT'S DINNER
SCHEDULE OF EVENTS
MAY 11, 1988

Function: REPULICAN LEADER'S RECEPTION *
Time: 11:15 - 12:00 noon
Location: US Capitol, Sen. Dole's Office S-230
Host: Senator Bob Dole
Attendees: Chairman, Co-Chairmen
Fundraisers at $30,000

Function: LEADERSHIP LUNCHEON
Time: 12:00 pm - 2:00pm
Location: Dirksen Senate Office Building, Room 106
Hosts: Senator Bob Dole & Congressman Bob Michel
Attendees: Chairman, Co-Chairmen
Fundraisers at $30,000
Selected Senators & Congressmen

Function: VICE PRESIDENT BUSH LUNCHEON *
Time: 12:00 - 1:30
Location: Vice President's Residence, Observatory Hill
Hosts: Vice President & Mrs. Bush
Attendees: Chairman, Co-Chairmen
Fundraisers at $45,000

Function: PRESIDENTIAL PHOTO OPPORTUNITY *
Time: 2:30 - 3:00pm
Location: The White House, Oval Office
Host: President Reagan
Attendees: Fundraisers at $60,000

Function: WHITE HOUSE RECEPTION *
Time: 5:00 - 6:00pm
Location: The White House
Hosts: The President & Mrs. Reagan
Attendees: Table Buyers at $15,000
Fundraisers at $30,000 (buy 1 table/sell 1)

Function: CABINET RECEPTION
Time: 5:00 - 6:00pm
Location: The Willard Inter-Continental Crystal Room
Hosts: James A. Baker, III - Sec. of Treasury
Attendees: Fundraisers at $45,000 and above

9304093411119

Function: CO-CHAIRMEN'S RECEPTION *
Time: 6:15 - 7:00pm
Location: Washington Convention Center, Room 32
Hosts: Co-Chairmen
Attendees: Vice President Bush, Selected Congressmen Senators, Special Guests

Function: GENERAL RECEPTION
Time: 6:30 - 7:30pm
Location: Washington Convention Center, Lobby 1
Hosts: Republican Members of Congress
Attendees: All Dinner Guests

Function: BUSH RECEPTION *
Time: 7:00 - 7:25pm
Location: Washington Convention Center, Holding Area
Hosts: David Murdock & George Bush
Attendees: 8 - 9 selected guests

Function: THE PRESIDENT'S DINNER *
Time: 7:30 - 10:00pm
Location: Washington Convention Center, Hall A
Hosts: President & Mrs. Reagan
Vice President & Mrs. Bush
Republican Members of Congress

Function: APRES DINNER RECEPTION
Time: 10:00 - 12:00 midnight
Location: Washington Convention Center, Lobby 1
Hosts: The President's Dinner Committee
Attendees: All Dinner Guests

Function: CHAIRMAN'S APRES DINNER PARTY *
Time: 10:00pm - 1:00 am
Location: Hay Adams Hotel
Host: Mr. David Murdock
Attendees: Selected Guests

9304093411 20

The President's Dinner
1101 17th Street, N.W., Suite 808
Washington, D.C. 20036
(202) 659-1771

9304093411211

Name

☐ Plan(s) to attend the President's Dinner on May 11, 1988. Enclosed is my maximum contribution of $_____ for:

_____ ticket(s) at $1,500

_____ table(s) of ten at $15,000
Each tablebuyer will receive one complimentary invitation which will admit two persons to one of the following:

☐ An exclusive reception with Cabinet Members (limited to first 150 respondents)

or

☐ A White House reception to be hosted by President and Mrs. Reagan (attendance will be limited)

(please indicate choice by checking appropriate space above)

☐ I or one of my guests will require special handicapped access.

☐ Regrets. I'm sorry I won't be able to attend. However, I want to support The President's Dinner and have enclosed my maximum contribution of $_____

Seating will be assigned according to the order of response.

Please make checks payable to: The President's Dinner

(Please see reverse side for important information)

THE PRESIDENT'S DINNER
1101 17TH STREET, NW SUITE 808
WASHINGTON, D.C. 20036

TELEPOST

ACTION ALERT

1STCLASS:LNGPRD1>VOLUME:PPBRE
PRESID-PABCI-AI04001:66

April 29, 1988 13:51

Mr. Ronald O. Perelman
A.M.K. Acquisition Corporation
36 East 63rd Street
New York, New York 10021

ATTENTION . . . PRESIDENT AND MRS. REAGAN NEED YOUR HELP. THE PRESIDENT'S DINNER IS $1 MILLION SHORT OF GOAL.

AS A LOYAL CONTRIBUTOR TO PAST DINNERS, YOUR SUPPORT IS URGENTLY NEEDED. IF YOUR HELP IS NOT SECURED, ADEQUATE FUNDING FOR OUR 1988 SENATE AND HOUSE CANDIDATES WILL NOT BE SUPPLIED. WE MUST ENSURE THAT THE LEGACY OF THE REAGAN ADMINISTRATION IS CARRIED ON INTO THE FUTURE BY A STRONG REPUBLICAN COALITION IN CONGRESS.

THE RESPONSIBILITY IS NOW OURS. PRESIDENT AND MRS. REAGAN HAVE GIVEN ALL OF AMERICA A GREAT GIFT FOR WHICH WE MUST SHOW OUR APPRECIATION. DO NOT LET THEM DOWN.

BECAUSE OF YOUR ESTABLISHED LOYALTY TO THE PRESIDENT'S DINNER, YOU ARE ONE OF A SPECIAL GROUP WHOSE SUPPORT IS REPORTED TO PRESIDENT REAGAN.

WE WILL HOLD TICKETS IN YOUR NAME UNTIL WE HEAR FROM YOU. RESPOND TODAY. IF YOU CAN'T BE WITH US ON MAY 11, IT IS IMPORTANT THAT YOU JOIN US IN SPIRIT BY SENDING A SPECIAL CONTRIBUTION.

YOU MAY CALL OUR DINNER OFFICE (202) 659-1771 WITH YOUR RESERVATIONS OR RETURN THE ATTACHED FORM WITH YOUR CONTRIBUTION TODAY.

IF YOU HAVE ALREADY SENT IN YOUR CONTRIBUTION, PLEASE ACCEPT OUR APOLOGIES -- THIS IS TOO CRITICAL FOR US TO TAKE THE CHANCE OF MISSING YOU.

THANK YOU FOR YOUR SUPPORT.

RUDY BOSCHWITZ
CHAIRMAN, NATIONAL REPUBLICAN
SENATORIAL COMMITTEE

GUY VANDER JAGT
CHAIRMAN, NATIONAL REPUBLICAN
CONGRESSIONAL COMMITTEE

** PLEASE DETACH AND RETURN IN THE ENCLOSED POSTAGE-PAID ENVELOPE **

☐ YES, I WILL ATTEND THE PRESIDENT'S DINNER ON MAY 11.
ENCLOSED IS MY CONTRIBUTION OF $_____ OR:

_____TICKETS AT $1,500 EACH _____TABLES AT $15,000 EACH

☐ NO, I CANNOT ATTEND, BUT I WANT TO HELP. ENCLOSED IS MY MAXIMUM CONTRIBUTION OF $_____.

Mr. Ronald O. Perelman
A.M.K. Acquisition Corporation
36 East 63rd Street
New York, New York 10021

PRLM036R
AI04

FIRST CLASS PERMIT #10782 WASH DC
POSTAGE WILL BE PAID BY ADDRESSEE

THE PRESIDENT'S DINNER
1101 17TH STREET, NW SUITE 808
P.O. BOX 96500
WASHINGTON, D.C. 20077-7554

PLEASE MAKE CHECKS PAYABLE TO: THE PRESIDENT'S DINNER
PAID FOR BY THE PRESIDENT'S DINNER COMMITTEE
CONTRIBUTIONS ARE NOT TAX DEDUCTIBLE

9304093411 23

THE PRESIDENT'S DINNER

DAVID H. MURDOCK
CHAIRMAN

March 10, 1988

Mr. Ronald O. Perelman
A.M.K. Acquisition Corporation
36 East 63rd Street
New York, New York 10021

Dear Ronald:

It is with a great sense of honor that I have accepted President Reagan's personal request to serve as Chairman of The 1988 President's Dinner. The President and Mrs. Reagan especially emphasized their strong desire to make this the best and most successful fundraising Dinner to date.

This is a very special event. It is our opportunity to honor the President and Mrs. Reagan for their eight years of leadership for this country and their many years of friendship to us.

As Dinner Chairman, I am pleased to tell you that in the next couple of days you will be receiving an invitation to join the President of the United States and Mrs. Reagan at The 1988 President's Dinner on May 11th. On behalf of the President, I am asking for your support again this year.

Your participation will help provide the financial support needed to elect Republican candidates for Congress.

President Reagan's legacy will be a strong and prosperous America. Let us honor this legacy by continuing to elect Republican Senators and Congressmen who will carry President Reagan's policies into the next century. Let's make sure our children and grandchildren grow up in a country made strong by Ronald Reagan and the principles he has instituted.

I am asking you, personally, to join our effort to say thank you to one of the great American Presidents: Ronald Reagan.

I know the President and Mrs. Reagan are looking forward to seeing you on May 11th in Washington, D.C.

Sincerely,

David H. Murdock

9304093411124

1101 17th Street, N.W., Suite 808, Washington, D.C. 20036 (202) 659-1771

Paid for by The President's Dinner Committee. Proceeds will be divided evenly between the National Republican Congressional Committee and the National Republican Senatorial Committee for the benefit of Republican candidates. Donations may be designated or reallocated in order to comply with Federal limits on political contributions. Contributions to The President's Dinner are not deductible as charitable contributions for Federal income Tax purposes.

930409341125

RONALD O. PERELMAN
36 EAST 63RD STREET
NEW YORK, NY 10021

3488

June 24 19 88

1-131
2113

PAY TO THE ORDER OF The Presidential Trust $ *5,000.00

*Five thousand and no/100---------- DOLLARS

The Chase Manhattan Bank, N.A.
726 Madison Avenue at 64th Street
New York, NY 10021

CHASE

MEMO contribution

0000

1987 - RNC

9304093411 26

A M K ACQUISITION CORPORATION

ACCOUNT NUMBER

2169

1-2/210 000

April 10, 1987

PAY TO THE ORDER OF "The President's Dinner - Building Fund" $ 6,000.00**

Six Thousand & 00/100******** DOLLARS

CHASE The Chase Manhattan Bank, N.A.
1 Chase Manhattan Plaza, New York, N.Y. 10081

FOR

Richard E. Hall

A M K ACQUISITION CORPORATION

ACCOUNT NUMBER

2170

1-2/210 000

April 10, 1987

PAY TO THE ORDER OF "The President's Dinner - Building Fund" $ 9,000.00**

Nine Thousand & 00/100********* DOLLARS

CHASE The Chase Manhattan Bank, N.A.
1 Chase Manhattan Plaza, New York, N.Y. 10081

FOR

Richard E. Hall

930409341127

1986 - RNC

9304093411 28

John Heinz
Chairman, National Republican Senatorial Committee

Robert Dole
Majority Leader of the Senate

Guy Vander Jagt
Chairman, National Republican Congressional Committee

Robert H. Michel
Republican Leader of the House

The President's Dinner

Drew Lewis
Dinner Chairman

T. Boone Pickens
Dinner Co-Chairman

Walter Wriston
Dinner Co-Chairman

Ted Welch
Ex-Officio Dinner Chairman

Jack McDonald
Dinner Co-Chairman

Howard Allen
Dinner Co-Chairman

May 14, 1986

Mr. Richard Halperin
36 East 63rd Street
New York, New York 10021

Dear Richard:

Thank you very much for your contribution of $3,000 to The President's Dinner. I am pleased to hear that you will be joining us on Wednesday, May 21.

On behalf of President and Mrs. Reagan, Vice President and Mrs. Bush, and all the Republican members of the U.S. Senate and House of Representatives, I would like to tell you how deeply we appreciate your support of the Dinner and our Party.

All Dinner tickets will be held at "Will Call" which, for your convenience, is going to be open at the Washington, D.C. Convention Center (900 Ninth Street, N.W.) on Tuesday, May 20 from 12 noon to 6:30 p.m. and Wednesday, May 21 from 10 a.m. to 8 p.m. "Will Call" will be located in Lobby 2 at the Ninth Street entrance of the Convention Center. No tickets will be mailed before the Dinner. If you have any guests joining you the night of the Dinner, please have them request their tickets under the purchaser's name.

Should circumstances prevent your attendance or if you should require special assistance, please call Brian Kraft, at The President's Dinner, (202) 659-1771.

Again, thank you for your generosity and commitment. I look forward to seeing you on Wednesday, May 21.

Sincerely,

Drew Lewis

P.S. I've enclosed a card listing special hotel and airline rates for Dinner attendees.

9304093412 9

1101 17th Street, N.W., Suite 808, Washington, D.C. 20036 (202) 659-1771

Paid for by The President's Dinner Committee. Proceeds will be divided evenly between the National Republican Congressional Committee and the National Republican Senatorial

9304093411311

THE PRESIDENT'S DINNER

—HOTEL ACCOMMODATIONS—

Five hotels will participate in housing for The President's Dinner in Washington. These hotels are all centrally located in Washington and provide easy access to the Convention Center, where the Dinner will take place.

The Washington Hilton 1919 Connecticut Ave., N.W. Washington, D.C. 20009	(202) 483-3000 Rates: Single—$88* Double—$108*
Vista International Hotel 1400 M Street, N.W. Washington, D.C. 20005	(202) 429-1700 Rates: Single—$150* Double—$170*
J.W. Marriott Hotel 1331 Pennsylvania Ave., N.W. Washington, D.C. 20001	(202) 393-2000 Rates: Single—$125* Double—$125*
The Ritz-Carlton Hotel 2100 Massachusetts Ave., N.W. Washington, D.C. 20008	(202) 293-2100 Rates: Single—$160* Double—$185*
The Mayflower 1127 Connecticut Ave., N.W. Washington, D.C. 20036	(202) 347-3000 Rates: Single—$135* Double—$135*

When calling for reservations, please inform the hotel that you are attending The President's Dinner on May 21st.

—LIMOUSINE SERVICE—

Admiral Limousine Service	(703) 548-4382
Thompson & Sons Limousine, Inc.	(202) 584-1653

*Note: Hotel rates do not include applicable taxes.

RONALD REAGAN

July 18, 1986

Mr. Richard Halperin
36 East 63rd Street
New York, New York 10021

Dear Richard:

I would like to thank you for your very generous support of the 1986 President's Dinner.

Every year, The President's Dinner grows in importance to our Senate and House of Representatives candidates. This year's Dinner, because of loyalists like you, was a record-breaking success!

I've said before that for the American people, nothing is impossible, no victory is beyond our reach, no glory is ever too great. Well, you've shown me again just how true this is.

I hope you will join Nancy and me next year at the 1987 President's Dinner. Our good friend T. Boone Pickens will serve as Dinner Chairman, and I urge you to support him in this most worthy endeavor. I know he will do a spectacular job with your cooperation.

Once more, thank you very much for all you have done to make this grand Dinner possible.

Sincerely,

Ronald Reagan

Ronald Reagan

930409341 32

Paid for and authorized by The President's Dinner Committee.

National Community Bank of New Jersey

No. 280600

MAY 6, 86

55-271
212

BANK MONEY ORDER

Pay HARMON MEADOW SECAUCUS, N.J. 3,000dol's00cts

To The Order of Contribution

PRESIDENT'S DINNER

CONGAR TRADEMARKS

Rosemary Sibarco

Debra L Whitney
AUTHORIZED SIGNATURE

"280600" :021202719: 00000 001 9"

930409341133

RONALD O. PERELMAN
36 EAST 63RD STREET
NEW YORK, NY 10021

2695

October 21 19 87

1-231
2131

PAY TO THE ORDER OF George Bush for President Campaign $ *500.00

*Five hundred and no/100 DOLLARS

CHASE

The Chase Manhattan Bank, N.A.
726 Madison Avenue at 64th Street
New York, NY 10021

For contribution

300

930400934134

2395

RONALD O. PERELMAN
36 EAST 63RD STREET
NEW YORK, NY 10021

Aug 4 19 07

1-231
2163

PAY TO THE ORDER OF Gibbons For Congress $ *1,000.00

One thousand & NO/100 DOLLARS

CHASE
The Chase Manhattan Bank, N.A
726 Madison Avenue at
64th Street
New York, N.Y. 10021

MEMO Contribution

Ron Perelman

100

930409341135

Democratic Senatorial Campaign Committee

DATE	INVOICE NO.	DESCRIPTION	GROSS AMT	DISCOUNT	NET AMT
5/7/91		contribution refund	5,000.00		

Democratic Senatorial Campaign Committee
OPERATING ACCOUNT
430 S. CAPITOL ST., S.E. PH. 202-224-2447
WASHINGTON, DC 20003

SOVRAN® BANK DC NATIONAL
1801 K STREET, NW • WASHINGTON, DC 20006

15-120/540 D01

DATE	CHECK NO.	PAYEE I.D.
5/7/91		

Five Thousand and xx/100 ----------

PAY THIS AMOUNT
5,000.00

PAY TO THE ORDER OF
Ronald O. Perelman
21 E. 63rd Street
New York, NY 10021

Robert W. Hyland
Thomas J. Lehrer

⑈000201 6⑈ ⑆054001204⑆ ⑈272166 2⑈

930409341 36

REPORTS OF RECEIPTS AND DISBURSEMENTS
For Authorized Committee

(Summary Page)

1. Name of Committee (in Full)
The Moynihan Committee, Inc.

2. FEC Identification Number
C0078295

Address (Number and Street)
540 Madison Avenue

3. Is this Report an Amendment?
☐ YES ☒ NO

City, State and Zip Code
New York, NY 10022

☐ Check if address is different than previously reported.

H.D.

4. TYPE OF REPORT

- ☐ April 15 Quarterly Report
- ☐ July 15 Quarterly Report
- ☐ October 15 Quarterly Report
- ☐ January 31 Year End Report
- ☒ July 31 Mid Year Report (Non-election Year Only)
- ☐ Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____
- ☐ Thirtieth day report following the General Election on _____ in the State of _____
- ☐ Termination Report

This report contains activity for – ☒ Primary Election ☒ General Election ☐ Special Election ☐ Runoff Election

8702000834222

		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5.	Covering Period SUMMARY 1/1/87 through 6/30/87		
6.	Net Contributions (other than loans)		
(a)	Total Contributions (other than loans) (From Line 11 (a))	$ 499,968.95	$ 499,968.95
(b)	Total Contribution Refunds (from Line 29 (d))	50.00	50.00
(c)	Net Contributions (other than loans) Subtract Line 6 (b) from 6 (a))	499,918.95	499,918.95
7.	Net Operating Expenditures		
(a)	Total Operating Expenditures (from Line 17)	139,234.25	139,234.25
(b)	Total Offsets to Operating Expenditures (from Line 18)	646.09	646.09
(c)	Net Operating Expenditures (Subtract Line 7 (b) from 7 (a))	138,588.16	138,588.16
8.	Cash on Hand at Close of Reporting Period (from Line 27)	$1,301,615.35	
9.	Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)		
10.	Debts and Obligations Owed BY The Committee (Itemize all on Schedule C or Schedule D)		

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

John Vastyrsaard
Type or Print Name of Treasurer

Signature of Treasurer

7/30/87
Date

Per Sandra Libenguth, Section
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463
Toll Free 800-424-9530
Local 202-376-3120

NOTE: Submission of false, erroneous or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g

All previous versions of this FEC Form 3 are obsolete and should no longer be used.

FEC FORM 3 (3/86)

of Receipts and Disbursements
(Page 2, FEC FORM 3)

Name of Committee (in Full)	Report Covering the Period		
The Moynihan Committee, Inc.	From: 1/1/87	To: 6/30/87	
I. RECEIPTS	**COLUMN A Total This Period**	**COLUMN B Calendar Year-to-Date**	
11 CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees	$ 244,568.95	$ 244,568.95	11 (a)
(Memo Entry Unitemized $ 43,958.95)			
(b) Political Party Committees	17,500.00	17,500.00	11 (b)
(c) Other Political Committees	237,900.00	237,900.00	11 (c)
(d) The Candidate			11 (d)
(e) TOTAL CONTRIBUTIONS (other than loans (add 11(a), 11(b), 11(c) and 11(d).	499,968.95	499,968.95	11 (e)
12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES			12
13. LOANS:			
(a) Made or Guaranteed by the Candidate			13 (a)
(b) All Other Loans			13 (b)
(c) TOTAL LOANS (add 13 (a) and 13 (b))			13 (c)
14. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	646.09	646.09	14
15. OTHER RECEIPTS (Dividends, Interest, etc.)	25,668.70	25,668.70	15
16. TOTAL RECEIPTS (add 11 (e), 12, 13 (c), 14 and 15)	$ 526,283.74	$ 526,283.74	16
II. DISBURSEMENTS			
17. OPERATING EXPENDITURES . (Unitemized $5,792.59)	139,234.25	139,234.25	17
18. TRANSFERS TO OTHER AUTHORIZED COMMITTEES			18
19. LOAN REPAYMENTS:			
(a) Of Loans Made or Guaranteed by the Candidate			19 (a)
(b) Of All Other Loans			19 (b)
(c) TOTAL LOAN REPAYMENTS (add 19 (a) and 19 (b))			19 (c)
20. REFUNDS OF CONTRIBUTIONS TO:			
(a) Individuals/Persons Other Than Political Committees	50.00	50.00	20 (a)
(b) Political Party Committees			20 (b)
(c) Other Political Committees			20 (c)
(d) TOTAL CONTRIBUTION REFUNDS (add 20 (a), 20 (b), and 20 (c))			20 (d)
21. OTHER DISBURSEMENTS	5,000.00	5,000.00	21
22. TOTAL DISBURSEMENTS (add 17, 18, 19 (c), 20 (d) and 21)	144,284.25	144,284.25	22

III. CASH SUMMARY

23 CASH ON HAND AT BEGINNING OF REPORTING PERIOD	$ 919,615.86	23
24. TOTAL RECEIPTS THIS PERIOD (From Line 16)	$ 526,283.74	24
25. SUBTOTAL (Add Line 23 and Line 24)	$ 1,445,899.60	25
26. TOTAL DISBURSEMENTS THIS PERIOD (From Line 22)	$ 144,284.25	26
27 CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (Subtract Line 26 from 25)	$ 1,301,615.35	27

87020083423

The Moynihan Committee, Inc.
348 Madison Avenue, New York, NY 10022

ITEMIZED RECEIPTS

FOR LINE # 11a

PERIOD 01/01/87 TO 06/30/87

NAME AND ADDRESS	EMPLOYER AND OCCUPATION	DATE	AMOUNT	ELECTION
I. Pei 600 Madison Avenue New York NY 10022 YEAR TO DATE $1000.00	I. M Pei & Partners Architect	05/12/87	$1000.00	Primary -87
Ronald Perelman 740 Park Avenue New York NY 10021 YEAR TO DATE $2000.00	Revlon Chairman	01/23/87 01/23/87	$1000.00 $1000.00	Primary -87 General-87
Lawrence Peters 143 Cabot Road Massapequa NY 11758 YEAR TO DATE $500.00	Dime Savings Bank Banking	06/03/87	$500.00	Primary -87
Donald Petrie Box 888 Mainecott NY 11975 YEAR TO DATE $1000.00	Lazard Freres & Co. Investment Banking	05/12/87	$1000.00	Primary -87
George Phillips Shearson Lehman Brothers American Express Tower New York NY YEAR TO DATE $1000.00	Shearson Lehman Investment Banking	02/24/87	$1000.00	Primary -87
Suzanne Pincus 466 Lexington Avenue 16th Floor New York NY 10017 YEAR TO DATE $1000.00	Housewife	05/05/87	$1000.00	Primary -87
Sidney Port 1040 Lake Shore Dr., 6B1A Chicago IL 60611 YEAR TO DATE $250.00	On Request	05/05/87	$250.00	Primary -87
Kathleen Quayle P. O. Box 147 Pound Ridge NY 10576 YEAR TO DATE $250.00	First Boston Corp. Investment Banking	01/23/87	$250.00	Primary -87
Patricia Raynes 229 East 85th Street New York NY YEAR TO DATE	Housewife			-87

87020033442

06C2210

RECEIVED
FEDERAL ELECTION COMMISSION
ADMINISTRATIVE DIVISION
91 AUG 13 AM 11:37

SKADDEN, ARPS, SLATE, MEAGHER & FLOM
1440 NEW YORK AVENUE, N.W.
WASHINGTON, D.C. 20005-2107
(202) 371-7000

FAX (202) 393-5760
DIRECT DIAL
(202) 371-

BOSTON
BRUSSELS
CHICAGO
HONG KONG
LONDON
LOS ANGELES
NEW YORK
SAN FRANCISCO
SYDNEY
TOKYO
TORONTO
WILMINGTON

August 14, 1991

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
91 AUG 15 AM 10:44

BY HAND

Lawrence M. Noble, Esq.
General Counsel
Federal Election Commission
999 E Street, Northwest
Washington, D.C. 20463
Attn: Lisa Klein
Frances Hagan

Re: MUR 3104 - Ronald O. Perelman

Dear Mr. Noble:

This letter supplements our prior responses in this matter concerning political contributions made by Ronald O. Perelman ("Respondent"). It is our understanding, based on discussions with members of the Office of General Counsel ("OGC"), that OGC may recommend to the Commission that it make a reason to believe finding regarding a $2,000 contribution that the Respondent made to The Moynihan Committee, Inc. ("Moynihan Committee"), Senator Moynihan's principal campaign committee. The Moynihan Committee received the Respondent's contribution in January 1987.

The Respondent strongly objects to OGC making this reason to believe recommendation. As demonstrated below, past Commission decisions dictate that no action should be taken concerning this contribution.

The Respondent contributed $2,000 to the Moynihan Committee and, consistent with the Respondent's intent, the Moynihan Committee designated $1,000 to the primary election campaign and $1,000 to the general election campaign. The Moynihan Committee maintained a separate accounting of primary election and general election contributions and reported to the FEC the designation of the Respondent's contribution to the primary and general elections. Under the regulations in effect at the time of the contribution, an advisory opinion and several

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enforcement matters, there is no basis for the Commission to pursue this matter.

1. Former Regulation

Former 11 C.F.R. § 102.9(e), the regulation in effect at the time the Respondent contributed to the Moynihan Committee, allowed a recipient of a contribution to allocate an undesignated pre-primary contribution to the general election limit. See Compilation of the Explanation and Justification for the Federal Election Commission's Regulations at 246 (1990) (explaining the revision to 11 C.F.R. § 102.9(e)). That is precisely what the Moynihan Committee did with the Respondent's pre-primary contribution to the extent it exceeded $1,000.

2. Advisory Opinion

In FEC Advisory Opinion 1980-67 (In re Long for Senate), the Commission found that under former section 102.9(e) a recipient candidate could attribute to the general election an undesignated pre-primary contribution. Under AO 1980-67, even if a recipient redesignates a contribution from the primary to the general election, neither the contributor nor the recipient may be found in violation of the law. Neither the former regulation nor AO 1980-67 required that a contributor designate the contribution in writing or consent to the recipient's redesignation. Moreover, even if the contributor were required to provide a written designation showing the intent of the contributor, the recipient committee would not be required to maintain a copy of the written designation relating to a contribution more than three years after the contribution is reported to the Commission. 2 U.S.C. § 432(d). The time for maintaining documents related to the contribution in question passed before this matter was initiated.

3. Enforcement Actions

In several enforcement cases, the Commission has ruled to take no further action against the recipients of contributions which were designated by the recipient in accordance with former 11 C.F.R. § 102.9(e). The

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dismissals in those cases were based on language in the former regulation which provided for recipient redesignations even though the contributor did not designate the allocation of the contribution between the primary and general elections. See MURs 1588 (In re Fenwick for Senate); 1637 (In re The Committee to Reelect Senator Kennedy); 1648 (In re Riegle for Senate); 1674 (In re Harriett Woods for Senate); and 1696 (In re Citizens for Sarbanes).

Plainly, all contributions made before April 8, 1987, the effective date of the revised Section 102.9(e), may be redesignated by the recipient without the consent of the contributor. Indeed, it is difficult to understand why the Commission would now open an investigation that is based on the application of a flawed regulation (since corrected) to a contribution that was made so many years ago.

In our prior submissions, we urged the Commission to find no probable cause or, in the alternative, to take no further action against the Respondent for allegedly exceeding the annual contribution limit. For the reasons stated in our prior submissions and the arguments raised herein, we reassert the request to dismiss this entire matter along with the allegation concerning the Respondent's contribution to the Moynihan Committee.

Sincerely,

Kenneth A. Gross

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 3104
Dwayne O. Andreas	)	
Dorothy Inez Andreas	)	
Caroline Rose Hunt	)	
Henry Kravis	)	
Raymond Kravis	)	
Ronald O. Perelman	)	
Ira Riklis	)	
Meshulam Riklis	)	
Harold C. Simmons	)	
Donald J. Trump	)	

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GENERAL COUNSEL'S REPORT

I. BACKGROUND

Based on allegations in a Los Angeles Times newspaper article, the Commission found reason to believe that the following ten individuals violated 2 U.S.C. § 441a(a)(3) by making contributions in excess of annual limits: Dorothy Inez Andreas; Dwayne O. Andreas; Caroline Rose Hunt; Henry Kravis; Raymond Kravis; Ronald O. Perelman; Ira Riklis; Meshulam Riklis; Harold C. Simmons; and Donald J. Trump. The Commission also found reason to believe that Dorothy Inez Andreas and Henry Kravis violated 2 U.S.C. § 441a(a)(1)(A); and that Caroline Rose Hunt and Harold C. Simmons violated 2 U.S.C. § 441a(a)(1)(C).[1]

To date, the respondents have complied with this Office's discovery requests. In addition, they have submitted responses to the Commission's reason-to-believe findings, some of which

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1. Subsequently, Common Cause filed a complaint (former MUR 3161) alleging violations of 2 U.S.C. § 441a(a)(3) by seven of the ten individuals noted above. Complainant based the allegations on the newspaper article mentioned above. On January 16, 1991, the Commission decided to merge the complaint into MUR 3104.

include requests for no further action and/or pre-probable cause conciliation. Attachment A.[2]

II. ANALYSIS

This report includes recommendations regarding those respondents requesting no further action and/or those requesting pre-probable cause conciliation. It also includes new reason to believe recommendations regarding some of the respondents, as necessary. Resolution of issues involving those respondents who did not request pre-probable cause conciliation will be discussed in General Counsel's briefs.

The Office of the General Counsel thoroughly analyzed each response, reviewed check copies and other documentation submitted, and compared information in the responses with items on disclosure reports. Information obtained through review of respondents' documents was incorporated as appropriate. Our review of the available information revealed the following:

Dwayne O. and Dorothy Inez Andreas

The Commission found reason to believe that Mr. and Mrs. Andreas each exceeded Section 441a(a)(3)'s $25,000 limitation by $13,680 and $4,680, respectively.[3] In their responses, they both stated that they were unaware that a contribution to a candidate committee with respect to a

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2. Respondents submitted voluminous documents with their responses; therefore, not all of the check copies and attachments have been included with this report. The complete file is available for inspection in this Office's docket room.

3. Because of an addition error, Mrs. Andreas' total 1988 contributions originally were understated by $1,000.

particular election made in a non-election year will be considered to be made during the calendar year in which such election is held. Attachment A at 1 (Mrs. Andreas) and 4 (Mr. Andreas). Although Mr. Andreas acknowledged that "ignorance of the law is no excuse," he did suggest that there is widespread misunderstanding of the law based on his review of news articles and from his conversations with lawyers and office holders. Id. at 4. Both Mr. and Mrs. Andreas posit that some of their contributions may not have been used in 1988 based on the cash on hand of some of the recipient committees. Id. at 2 and 5. However, it is the making of the contribution, not the actual use of the contributed funds by the recipient that matters for purposes of the Act. They offered no evidence of contribution refunds or redesignations.

The Commission also found reason to believe that Mrs. Andreas had violated 2 U.S.C. § 441a(a)(1)(A) by contributing $2,000 to Jesse Jackson for President for the 1988 primary election. Mrs. Andreas contends that she made only one $1,000 contribution to that Committee. A review of checks obtained from the Audit Division's review of the Jackson Committee's matching funds submission indicates that these checks were drawn on one account that bears Mrs. Andreas' name. One check dated March 1, 1988, was signed by Mr. Andreas and another, dated March 9, 1988, was signed by Mrs. Andreas. We have not been able to reach Mrs. Andreas for clarification; however, the bank honored the check Mr. Andreas signed, indicating that he had signatory power on that account.

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Based on the supporting documentation, the Office of the General Counsel recommends that the Commission take no further action regarding this Section 441a(a)(1)(A) issue as it pertains to Mrs. Andreas, and increase the amount of Mr. Andreas' Section 441a(a)(3) violation by $1,000, making his total $14,680. We further recommend that the Commission enter into pre-probable cause conciliation concerning Mr. and Mrs. Andreas' violations of 2 U.S.C. § 441a(a)(3).

Meshulam Riklis

The Commission found reason to believe that Meshulam Riklis violated 2 U.S.C. § 441a(a)(3), exceeding the $25,000 limitation by $1,000. In his response to the Commission's reason to believe finding, Mr. Riklis argued that his contribution of $1,000 to the Biden for President campaign in 1987 should be attributable to that calendar year since the candidate dropped out of the race in 1987. Attachment A at 32-33. However, Mr. Biden remained a candidate for the 1988 election for purposes of the Act, see 2 U.S.C. § 431(2), and Mr. Riklis' contribution was made "with respect to a particular election," the 1988 election. Moreover, it does not appear that any contributions to Mr. Biden were returned because the candidate's campaign ended. Thus, the $1,000 contribution in question is attributable to Mr. Riklis' 1988 calendar year total.

However, in light of the amount involved and given that this is the only finding against Mr. Riklis, this Office recommends that the Commission take no further action against Mr. Riklis and close the file as it pertains to him.

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Caroline Rose Hunt

The Commission found reason to believe that Ms. Hunt violated 2 U.S.C. § 441a(a)(3) by $7,700 and that she violated 2 U.S.C. § 441a(a)(1)(C) by making an excessive contribution to a multi-candidate committee. Counsel for respondent has responded to this Office's discovery and requested that the Commission take no further action in this matter, or in the alternative enter into conciliation prior to a finding of probable cause to believe. Counsel states that Ms. Hunt was under the impression that one of her two largest contributions, either the $12,000 contribution to the RNC President's Dinner or her $10,000 contribution to the RNC Presidential Trust, would not count against her annual limit. Attachment A at 8-10. The President's Dinner contributor card, apparently included with the solicitation materials and submitted by respondent, states that the President's Dinner Committee is a joint fundraising committee, and that proceeds from the effort would be divided between the National Republican Congressional Committee and the National Republican Senatorial Committee pursuant to Federal law. The solicitation materials also indicate that contributors could designate their donations to "the President's Dinner--Building Fund," a non-federal account. Id. at 24. However, Ms. Hunt apparently did not exercise that option. Respondent received a refund of $4,500 from the President's Dinner on April 30, 1990, shortly after the Los Angeles Times article appeared and two years after she made the contribution.

In the original calculation of Ms. Hunt's contributions,

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two $1,000 contributions made in July 1988 to the Friends of Dick Armey were attributed to her annual limits. Counsel provided a letter from the Armey Committee stating that such contributions were not received. Id. at 114. The two contributions to the Armey Committee reportedly were made by a Caroline Hunt who resides at a different address from Caroline Rose Hunt. Counsel for the respondent also provided a letter from the non-party related Conservative Victory Committee stating that "Caroline Rose Hunt made a single contribution of $1,000 to the [Committee]." Id. at 13. An additional contribution of $5,000 originally attributed to this respondent is reported by the Conservative Victory Committee as a contribution from a Caroline Hunt having the same address as the contributor to the Armey Committee. Counsel explained that there is a Caroline Hunt married to respondent Caroline Rose Hunt's brother. Finally, respondent provided copies of additional contribution checks totaling $2,450.

Based on the evidence and information provided on behalf of Ms. Hunt, the amount in violation of Section 441a(a)(3) has been adjusted, resulting in a net amount of $3,150 in excess of the annual contribution limitation. Accordingly, this Office recommends that the Commission deny Ms. Hunt's request to take no further action and grant her request to enter into pre-probable cause conciliation. With regard to the Section 441a(a)(1)(C) issue, this Office further recommends that the Commission take no further action against Ms. Hunt.

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Ira Riklis

The Commission found reason to believe that Mr. Ira Riklis violated the annual contribution limit by $4,500. Mr. Riklis stated in an affidavit that he did not know a contribution he made to the Republican National Committee's "Presidential Trust" was for federal activity. Attachment A at 27-18 and 30-31. He also indicated that his RNC contribution of $15,000 was intended for non-federal activity and alleged that the RNC misdeposited the money into a federal account. Id. However, this assertion cannot be supported as Mr. Riklis did not provide a copy of the solicitation materials, nor did he show evidence that his donative intent was communicated to the party committee. Mr. Riklis obtained a partial refund of $5,000 from the Republican National Finance Committee after the Los Angeles Times article appeared. However, that refund occurred more than one and a half years after the date of the contribution.

In addition, based on our review of checks produced in response to the our discovery requests, it appears that respondent made additional excessive contributions to two candidate committees as follows:

Recipient Committee	Amount	Date of Contribution	Amount of Excessive
Hecht Re-election Comm.	$2,000	3/28/88(88P)	$1,000
	$2,000	3/28/88(88G)	$1,000
Jack Beuchner Comm.	$2,000	4/24/88(88P)	$1,000

Although Mr. Riklis' two contributions of $2,000 each to the Hecht Committee were designated for the primary and general

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elections, they were not partially attributed to his spouse pursuant to Commission regulations. Further, Mr. Riklis' contribution check of $2,000 to the Beuchner Committee contained no designations or attributions. As a result, Mr. Riklis' contributions to these two committees increase the amount of his Section 441a(a)(3) violation to $6,500. Moreover, these contributions exceed the limitations set forth at 2 U.S.C. § 441a(a)(1)(A).

In light of the foregoing, this Office recommends that the Commission find reason to believe that Mr. Riklis violated 2 U.S.C. § 441a(a)(1)(A). Counsel for Mr. Riklis has been advised of this recommendation but has not requested that this issue be included in Mr. Riklis' request for pre-probable cause conciliation. Accordingly, we recommend that the Commission deny Mr. Riklis' request to take no further action or in the alternative to enter into pre-probable cause conciliation at this time.

Harold Simmons

The Commission originally found reason to believe that Mr. Simmons exceeded the contribution limitation of Section 441a(a)(3) by $39,626 in 1988 and by $1,250 in 1989. The Commission also found reason to believe that Mr. Simmons exceeded the contribution limitations of 2 U.S.C. § 441a(a)(1)(C) by $5,000.

Pursuant to Commission regulations, a contribution must be designated in writing for a particular election pursuant to 11 C.F.R. § 110.1(b)(4) or it is presumed to be allocated to the

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next election. Contributions made by more than one person are to include the signatures of each contributor on the check or in a separate writing. 11 C.F.R. § 110.1(k).

In his response, Mr. Simmons stated that he was not aware that his contributions made in non-election years would be attributable toward his 1988 annual limit pursuant to 11 C.F.R. § 110.5(c)(2). Attachment A at 35. He stated that he also assumed certain contributions would be attributed as joint contributions with his wife. Id. After learning of possible compliance problems through the April 1990 Los Angeles Times newspaper article, respondent apparently sent letters to certain committees requesting contribution refunds and reattributions. Id. at 35-38. Between May and December 1990, Mr. Simmons received $20,000 in refunds. However, none of the attempted reattributions were timely and moreover, none included his wife's signature. Thus, these actions do not comport with the regulations at 11 C.F.R. §§ 103.3(b) and 110.1(k). The refunds, however, may serve as mitigating factors in conciliation negotiations.

In addition, six thousand dollars ($6,000) in excessive contributions from Mr. Simmons to candidate committees were found during a review of check copies provided by the respondent in answer to our request for documentation. The contributions were made as follows to the candidate committees:

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Recipient Committee	Amount	Date of Contribution	Amount of Excessive
Dole for President	$2,000	4/17/87(88P)	$1,000
Hatch Election Comm.	$2,000	4/21/87(88P)	$1,000
Hecht Re-election Comm.	$4,000	4/24/87(88P)	$1,000
		(88G)	$1,000
Friends of Dick Armey	$2,000	5/22/87(88P)	$1,000
Montoya for U.S. Senate	$2,000	3/07/88(88P)	$1,000

Respondent's check copies and/or accompanying documents show that the contributions above lacked election designations or a spouse's signature. Thus, these additional contributions are in violation of 2 U.S.C. § 441a(a)(1)(A), which prohibits contributions to candidate committees from individuals in excess of $1,000 per election. Moreover, these contributions, along with certain unitemized contributions provided by the respondent, also increase the amount attributable to the 1988 annual limit. The net result of these adjustments is to increase the amount of Mr. Simmons' Section 441a(a)(3) violation by $5,300 for a total of $44,926.

In light of the foregoing, this Office recommends that the Commission find reason to believe that Harold Simmons violated 2 U.S.C. § 441a(a)(1)(A). Since respondent has requested that any additional reason to believe findings be included with his request for pre-probable cause conciliation, this Office further recommends that the Commission enter into pre-probable cause conciliation with Harold Simmons.

Raymond Kravis

The Commission previously found reason to believe that

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Mr. Kravis violated 2 U.S.C. § 441a(a)(3). Respondent has responded to the Commission's reason to believe finding and discovery requests, but has not requested to enter into pre-probable cause conciliation. A review of check copies submitted by the respondent shows that on March 11, 1988, Mr. Kravis made a contribution of $4,000, which is $3,000 in excess of the limitations set forth at 2 U.S.C. § 441a(a)(1)(A), to the Metzenbaum Senate '88 campaign. The check, on its face, does not contain primary and general election designations, nor has other documentation containing such designations been produced in connection with this check. See 11 C.F.R. § 110.1(b)(2). Although the check bears a memo entry noting that it is "[f]or Bessie R. and Raymond F. Kravis," it does not include both spouses' signatures for a joint contribution as required by the Commission's regulations. See 11 C.F.R. § 110.1(k)(1). Therefore, in addition to the previous Commission finding regarding 2 U.S.C. § 441a(a)(3), this Office recommends that the Commission find reason to believe that Raymond Kravis violated 2 U.S.C. § 441a(a)(1)(A).

Ronald O. Perelman

The Commission found reason to believe that Mr. Perelman violated 2 U.S.C. § 441a(a)(3). In his response, Mr. Perelman has requested that the Commission find no probable cause to believe that he violated the Act or in the alternative that the Commission take no further action. Attachment A at 42. Mr. Perelman bases his request on the grounds that he intended his 1988 contribution to a RNC fundraising dinner to go to a

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non-federal account as had been his practice in other years. Id. at 48-49. The photocopies of his checks for those other annual RNC dinners reveal that they were made payable to the "President's Dinner-Building Fund," the designated non-federal account. By contrast, Mr. Perelman's 1988 contribution is made payable to the Presidential Trust. It thus appears that Mr. Perelman failed to designate properly his 1988 contribution for the non-federal account. With regard to his request for a no probable cause determination, such request is primature at this time. Accordingly, this Office recommends that the Commission deny Mr. Perelman's request to take no further action against him and move on to the next enforcement stage.

A review of checks submitted in response to the Commission's discovery requests also shows that Mr. Perelman made a contribution of $2,000 to the Moynihan Committee. This check, which was reportedly received on January 29, 1987, was not designated between the primary and general elections, nor was it partially attributed to respondent's spouse. See 11 C.F.R. §§ 110.1(b)(4) and 110.1(k). In this regard, Mr. Perelman's contribution to the Moynihan Committee is $1,000 in excess of the limitations set forth at 2 U.S.C. § 441a(a)(1)(A).

During a meeting with respondent's counsel to review documentation, we noted the additional Section 441a(a)(1)(A) problem. Counsel subsequently submitted a supplemental response to address this issue.

Respondent's counsel acknowledges that although

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Mr. Perelman may have violated Section 441a(a)(1)(A) of the Act, the Commission should not pursue this issue based on the regulations in effect at the time, an advisory opinion, and on the Commission's actions in certain similar enforcement matters. More specifically, counsel notes that former 11 C.F.R. § 102.9(e) appeared to allow recipient committees to designate to the general election contributions received prior to the primary election. Soon after the contribution at issue was made, the regulation was changed to make it consistent with 11 C.F.R. § 110.1. See 52 Fed. Reg. 760 (January 9, 1987) (revised to clarify that, effective April 8, 1987, only contributors could designate contributions). Respondent argues that the Moynihan Committee allocated the undesignated primary contribution between the primary and general elections in keeping with the regulation.

Respondent also notes that in Advisory Opinion 1980-67, the Commission cited former regulation 11 C.F.R. § 102.9(e) as support for allowing the recipient committee to redesignate pre-primary contributions between the primary and general elections. Further, several enforcement cases were dismissed before the regulation was clarified where respondents argued that Section 102.9(e) allowed designation of contributions by recipient committees. See, e.g., MUR 1696 (Citizens for Sarbanes); MUR 1674 (Harriet Woods for Senate); MUR 1648 (Riegle for Senate); MUR 1637 (Committee to Re-elect Senator Kennedy); and MUR 1588 (Fenwick for Senate). Therefore, based on past Commission action regarding this issue, this Office recommends

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that the Commission find reason to believe Ronald O. Perelman violated 2 U.S.C. § 441a(a)(1)(A), but take no further action.

Donald J. Trump

Counsel for respondent Trump asserts that the Commission should take no further action against Mr. Trump for violating 2 U.S.C. § 441a(a)(3) on the grounds that Mr. Trump attempted to take remedial action with regard to this violation before formal Commission action. Attachment A at 105-113. Apparently, Mr. Trump was advised by his counsel that the statute imposed a $25,000 calendar year contribution limit. Id. at 105-06. Counsel allegedly failed to advise Mr. Trump of the very next statutory sentence which unambiguously states that any contribution made to a federal candidate in a non-election year will be considered to be made during the calendar year in which such election is held. Id. at 106. See 2 U.S.C. § 441a(a)(3). Although this inaccurate legal advice may be a mitigating factor and possibly the basis for legal action against counsel, it does not warrant a finding of no further action with regard to this violation. Accordingly, this Office recommends that the Commission reject respondent's request to take no further action in this matter.

III. DISCUSSION OF CONCILIATION PROVISIONS AND CIVIL PENALTY

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IV. RECOMMENDATIONS

1. Find reason to believe that the following violated 2 U.S.C. § 441a(a)(1)(A) in this matter:

    a) Raymond Kravis;
    b) Ira Riklis;
    c) Harold C. Simmons; and
    d) Ronald O. Perelman.

2. Deny at this time the request of Ira Riklis to take no further action or, in the alternative to enter into conciliation prior to a finding of probable cause to believe.

3. Deny Ronald O. Perelman's request for no further action concerning a violation of 2 U.S.C. § 441a(a)(3), but take no further action against Ronald O. Perelman concerning a violation of 2 U.S.C. § 441a(a)(1)(A).

4. Take no further action against Dorothy Inez Andreas concerning a violation of 2 U.S.C. § 441a(a)(1)(A).

5. Deny the request of Caroline Rose Hunt to take no further action concerning a violation of 2 U.S.C. § 441a(a)(3), but take no further action against Caroline Rose Hunt concerning a violation of 2 U.S.C. § 441a(a)(1)(C).

6. Take no further action against Meshulam Riklis and close the file as it relates to him.

7. Deny the request of Donald J. Trump to take no further action.

8. Enter into conciliation with the following prior to a finding of probable cause to believe:

   a) Dorothy Inez Andreas;
   b) Dwayne O. Andreas;
   c) Caroline Rose Hunt; and
   d) Harold C. Simmons.

9. Approve the attached proposed conciliation agreements, Factual and Legal Analyses and the appropriate letters.

Lawrence M. Noble
General Counsel

9/17/91
Date

BY: _____
Lois G. Lerner
Associate General Counsel

Attachments
A. Requests for conciliation and/or no further action
B. Proposed Conciliation Agreements (4)
C. Factual and Legal Analyses (4)
D. Contribution Lists (6)

Staff assigned: Frances B. Hagan

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/ DONNA ROACH
COMMISSION SECRETARY

DATE: SEPTEMBER 19, 1991

SUBJECT: MUR 3104 - GENERAL COUNSEL'S REPORT DATED SEPTEMBER 17, 1991.

The above-captioned document was circulated to the Commission on WEDNESDAY, SEPTEMBER 18, 1991 at 11:00 A.M.

Objection(s) have been received from the Commissioner(s) as indicated by the name(s) checked below:

Commissioner Aikens	
Commissioner Elliott	XXX
Commissioner Josefiak	
Commissioner McDonald	
Commissioner McGarry	
Commissioner Thomas	XXX

This matter will be placed on the meeting agenda for THURSDAY, SEPTEMBER 26, 1991.

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	)	
	)	MUR 3104
Dwayne O. Andreas;	)	
Dorothy Inez Andreas;	)	
Caroline Rose Hunt;	)	
Henry Kravis;	)	
Raymond Kravis;	)	
Ronald O. Perelman;	)	
Ira Riklis;	)	
Meshulam Riklis;	)	
Harold C. Simmons;	)	
Donald J. Trump.	)	

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CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on September 26, 1991, do hereby certify that the Commission decided by a vote of 4-1 to take the following actions in MUR 3104:

1. Find reason to believe that Raymond Kravis, Ira Riklis, Harold C. Simmons, and Ronald O. Perelman violated 2 U.S.C. § 441a(a)(1)(A) in this matter.

2. Deny at this time the request of Ira Riklis to take no further action, or in the alternative to enter into conciliation prior to a finding of probable cause to believe.

(continued)

3. Deny Ronald O. Perelman's request for no further action concerning a violation of 2 U.S.C. § 441a(a)(3).

4. Take no further action against Dorothy Inez Andreas concerning a violation of 2 U.S.C. 441a(a)(1)(A).

5. Deny the request of Caroline Rose Hunt to take no further action concerning a violation of 2 U.S.C. § 441a(a)(3), but take no further action against Caroline Rose Hunt concerning a violation of 2 U.S.C. § 441a(a)(1)(C).

6. Take no further action against Meshulan Riklis and close the file as it relates to him.

7. Deny the request of Donald J. Trump to take no further action.

8. Enter into conciliation with Dorothy Inez Andreas, Dwayne O. Andreas, Caroline Rose Hunt, and Harold C. Simmons prior to a finding of probable cause to believe.

9. Approve the proposed conciliation agreements, Factual and Legal Analyses, and the appropriate letters as recommended in the General Counsel's report dated September 17, 1991.

Commissioners Aikens, Josefiak, McGarry and Thomas voted affirmatively for the decision; Commissioner Elliott dissented; Commissioner McDonald was not present.

Attest:

9/30/91
Date

Marjorie W. Emmons
Secretary of the Commission

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 11, 1991

Ms. Dorothy Inez Andreas
9909 Collins Avenue
Bal Harbor
Miami Beach, Florida 33154

RE: MUR 3104
Dorothy Inez Andreas

Dear Ms. Andreas:

On August 3, 1990, the Federal Election Commission found reason to believe that you violated 2 U.S.C. §§ 441a(a)(3) and 441a(a)(1)(A), and began an investigation in this matter.

The Commission, on September 26, 1991, determined to take no further action concerning the violation of 2 U.S.C. § 441a(a)(1)(A). At the same time, at your request, the Commission determined to enter into negotiations directed towards reaching a conciliation agreement in settlement of the violation of 2 U.S.C. § 441a(a)(3) prior to a finding of probable cause to believe.

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. In light of the fact that conciliation negotiations prior to a finding of probable cause to believe are limited to a maximum of 30 days, you should respond to this notification as soon as possible.

If you have any questions or suggestions for changes in the agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Frances B. Hagan, the staff member assigned to this matter, at (202) 219-3400.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure
Conciliation Agreement
Contribution List

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DOROTHY INEZ ANDREAS

LAST	FIRST	AMOUNT	P/G	YOE	DATE	CANDIDATE/CMTE
ANDREAS	INEZ	$1,000.00	P	88	17-FEB-1987	BYRD,FRIENDS OF ROBE
ANDREAS	INEZ	$1,000.00	P	88	17-MAR-1987	DURENBERGER FOR SEN
ANDREAS	INEZ	$1,000.00	G	88	02-APR-1987	GARZA, KIKA DE LA FO
ANDREAS	INEZ	$1,000.00	P	88	03-JUN-1987	SIMON,PAUL FOR PRES.
ANDREAS	INEZ	$1,000.00	P	88	17-SEP-1987	HECHT REELECTION CMT
ANDREAS	INEZ	$1,000.00	P	88	15-OCT-1987	KARNES,CMT FOR SAM
ANDREAS	DWAYNE MRS	$1,000.00	P	88	04-NOV-1987	BENTSEN; SEN. LLOYD
ANDREAS	INEZ	$1,000.00	P	88	24-NOV-1987	BURDICK CAMPAIGN CMT
ANDREAS	INEZ	$1,000.00	P	88	04-NOV-1987	BENTSEN; SEN LLOYD
ANDREAS	INEZ	$1,000.00	P	88	07-DEC-1987	WRIGHT APPRECIATION
ANDREAS	INEZ	$1,000.00	P	88	17-DEC-1987	BONKER FOR CONGR.
ANDREAS	INEZ	$1,000.00	P	88	12-FEB-1988	ASKEW FOR SENATE
ANDREAS	INEZ	$1,000.00	P	88	12-FEB-1988	LEHMAN,WILLIAM CAMP
ANDREAS	INEZ	$1,000.00	P	88	16-MAR-1988	GIBBONS,CMT FOR SAM
ANDREAS	INEZ	$1,000.00	P	88	01-APR-1988	JACKSON,JESSE FOR PR
ANDREAS	INEZ	$1,000.00	P	88	04-APR-1988	GORE,ALBERT FOR PRES
ANDREAS	INEZ	$1,000.00	P	88	22-APR-1988	MACK,FRIENDS OF CONN
ANDREAS	INEZ	$1,000.00	P	88	24-MAY-1988	DEM.SENATORIAL CAMP
ANDREAS	INEZ	$1,000.00	P	88	25-MAY-1988	DUKAKIS FOR PRES
ANDREAS	INEZ	$5,000.00	P	88	01-JUN-1988	REPUBLICAN NAT'L CMT
ANDREAS	INEZ	($320.00)	P	88	20-JUN-1988	ASKEW FOR SENATE
ANDREAS	INEZ	$1,000.00	P	88	30-JUN-1988	MOODY,FRIENDS OF JIM
ANDREAS	INEZ	$1,000.00	G	88	06-OCT-1988	GLICKMAN FOR CONGRES
ANDREAS	INEZ	$1,000.00	P	88	07-OCT-1988	CAMPAIGN AMERICA
ANDREAS	INEZ	$1,000.00	G	88	28-OCT-1988	MACK,FRIENDS OF CONN
ANDREAS	D O MRS	$1,000.00	G	88	16-NOV-1988	MICHEL FOR CONG CMTE
ANDREAS	INEZ	$1,000.00	G	88	19-NOV-1988	DURENBERGER FOR SEN
	TOTAL	$29,680.00				

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 11, 1991

Mr. Dwayne O. Andreas
Archer Daniels Midland Company
Box 1470
Decatur, Illinois 62525

RE: MUR 3104
Dwayne O. Andreas

Dear Mr. Andreas:

On August 3, 1990, the Federal Election Commission found reason to believe that you violated 2 U.S.C. § 441a(a)(3), and began an investigation in this matter.

At your request, on September 26, 1991, the Commission determined to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe.

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. In light of the fact that conciliation negotiations prior to a finding of probable cause to believe are limited to a maximum of 30 days, you should respond to this notification as soon as possible.

If you have any questions or suggestions for changes in the agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Frances B. Hagan, the staff member assigned to this matter, at (202) 219-3400.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure
Conciliation Agreement
Contribution List

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DWAYNE O. ANDREAS

LAST	FIRST	AMOUNT	P/G	YOE	DATE	CANDIDATE/CMTE
ANDREAS	DWAYNE	$1,000.00	P	88	17-FEB-1987	BYRD; FR OF ROBERT C
ANDREAS	DWAYNE	$1,000.00	P	88	20-FEB-1987	GEPHART FOR PRESIDEN
ANDREAS	DWAYNE	$1,000.00	P	88	17-MAR-1987	DURENBERGER FR SEN
ANDREAS	D O	$1,000.00	G	88	02-APR-1987	GARZA,KIKA DE LA FOR
ANDREAS	DWAYNE	$1,000.00	P	88	22-APR-1987	RIEGLE FOR SENATE'88
ANDREAS	D O	$1,000.00	P	88	03-JUN-1987	SIMON, PAUL FR PRES
ANDREAS	DWAYNE	$1,000.00	P	88	06-JUN-1987	MELCHER FOR SENATE
ANDREAS	D O	$1,000.00	P	88	15-JUN-1987	HATCH ELECTION CMT
ANDREAS	DWAYNE	$1,000.00	P	88	17-SEP-1987	HECHT REELECT
ANDREAS	D O	$1,000.00	P	88	15-OCT-1987	KARNES;FR OF DAVID
ANDREAS	DWAYNE	$1,000.00	P	88	04-NOV-1987	BENTSEN;SEN LLOYD C
ANDREAS	D O	$1,000.00	P	88	24-NOV-1987	BURDICK CAMP CMT
ANDREAS	D O	$1,000.00	P	88	07-DEC-1987	WRIGHT APPRECIATION FND
ANDREAS	D O	$1,000.00	P	88	17-DEC-1987	BONKER FOR CONGRESS
ANDREAS	DWAYNE	$1,000.00	P	88	21-DEC-1987	FASCELL;DANTE B CON
ANDREAS	DWAYNE	$1,000.00	P	88	12-FEB-1988	ASKEW FOR SENATE
ANDREAS	DWAYNE	$1,000.00	P	88	16-MAR-1988	GIBBONS;CMTE FR SAM
ANDREAS	DWAYNE	$1,000.00	P	88	01-APR-1988	JACKSON, JESSE FOR PR.
ANDREAS	DWAYNE	$1,000.00	P	88	04-APR-1988	GORE, ALBERT PRES
ANDREAS	DWAYNE	$5,000.00	P	88	06-APR-1988	ADM CO. (ADM PAC)
ANDREAS	DWAYNE	$1,000.00	P	88	14-APR-1988	GRAY US SENATE
ANDREAS	DWAYNE	$1,000.00	P	88	22-APR-1988	MACK; FR OF CONNIE
ANDREAS	D O	$1,000.00	P	88	28-APR-1988	CMT FOR DEM.OPPORTUNITY
ANDREAS	DWAYNE	$1,000.00	P	88	22-MAY-1988	LUGAR; FR OF DICK
ANDREAS	DWAYNE	$1,000.00	P	88	24-MAY-1988	DSCC
ANDREAS	DWAYNE	$1,000.00	P	88	25-MAY-1988	DUKAKIS FOR PRESIDENT
ANDREAS	DWAYNE	$5,000.00	P	88	01-JUN-1988	RNC
ANDREAS	DWAYNE	$1,000.00	G	88	07-JUN-1988	METZENBAUM SEN '88
ANDREAS	DWAYNE	($320.00)	P	88	20-JUN-1988	ASKEW FOR SENATE
ANDREAS	D O	$1,000.00	G	88	05-AUG-1988	MICHEL FOR CONG. CMTE
ANDREAS	DWAYNE	$1,000.00	G	88	28-OCT-1988	MACK; FR OF CONNIE
ANDREAS	DWAYNE	$1,000.00	G	88	19-NOV-1988	DURENBERGER; US SENA
	TOTAL	$38,680.00				

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 11, 1991

C. Jedson Nau, Esquire
100 Crescent Court
Suite 1700
Dallas, Texas 75201

RE: MUR 3104
Caroline Rose Hunt

Dear Mr. Nau:

On August 3, 1990, the Federal Election Commission found reason to believe that your client, Caroline Rose Hunt, violated 2 U.S.C. §§ 441a(a)(3) and 441a(a)(1)(C), and began an investigation in this matter.

The Commission, on September 26, 1991, determined to take no further action concerning the violation of 2 U.S.C. § 441a(a)(1)(C). At the same time, the Commission denied your client's request to take no further action concerning a violation of 2 U.S.C. § 441a(a)(3). However, at your request, the Commission determined to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If your client agrees with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations prior to a finding of probable cause to believe are limited to a maximum of 30 days, you should respond to this notification as soon as possible.

If you have any questions or suggestions for changes in the agreement, or if you wish to arrange a meeting in connection with

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a mutually satisfactory conciliation agreement, please contact Frances B. Hagan, the staff member assigned to this matter, at (202) 219-3400.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure
Conciliation Agreement
Contribution List

93040934167

CAROLINE HUNT

LAST	FIRST	AMOUNT	P/G	YOE	DATE	CANDIDATE/CMTE
HUNT	CAROLINE	$2,000.00	P/G	88	24-FEB-1987	BENTSEN, LLOYD SEN.
HUNT	CAROLINE	$100.00	P	88	13-MAY-1987	BARTLETT, STEVE CONG.
HUNT	CAROLINE	$100.00	P	88	01-MAR-1988	TX WOMEN FOR BUSH (BUSH FOR PRES.)
HUNT	CAROLINE	$10,000.00	P	88	18-APR-1988	REP. NAT'L CMTE
HUNT	CAROLINE	$12,000.00	P	88	25-APR-1988	REP. PRESIDENT DINNE
HUNT	CAROLINE	$1,000.00	P	88	04-MAY-1988	COTTONWOOD PAC
HUNT	CAROLINE	$1,000.00	G	88	09-MAY-1988	BUSH,GEORGE FOR PRES
HUNT	CAROLINE	$700.00	P	88	15-JUN-1988	JEFFORDS-MACK VICTOR
HUNT	CAROLINE	$250.00	P	88	27-JUN-1988	WILLIAMS CONG.' 88
HUNT	CAROLINE	$1,000.00	P	88	25-JUL-1988	CONSERVATIVE VICTORY
	TOTAL	$28,150.00				

9304093411168

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 11, 1991

Kenneth S. Levine, Esquire
Paul Sullivan, Esquire
Wunder, Ryan, Cannon & Thelen
1615 L Street, N.W., Suite 650
Washington, D.C. 20036

RE: MUR 3104
Raymond Kravis

Dear Mr. Levine and Mr. Sullivan:

On August 3, 1990, the Federal Election Commission found reason to believe that your client, Raymond Kravis, violated 2 U.S.C. § 441a(a)(3), and began an investigation in this matter.

In addition, the Commission, on September 26, 1991, found that there is reason to believe your clients violated 2 U.S.C. § 441a(a)(1)(A), a provision of the Act. The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against your client. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath.

In the absence of any additional information demonstrating that no further action should be taken against your client, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If your client is 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, the Commission will not entertain requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent.

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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 the General Counsel ordinarily will not 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 you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Frances B. Hagan, the staff member assigned to this matter, at (202) 219-3400.

Sincerely,

John Warren McGarry

John Warren McGarry
Chairman

Enclosures
Factual and Legal Analysis
Procedures

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Raymond Kravis MUR: 3104

Based on allegations in a Los Angeles Times newspaper article, the Commission, on August 3, 1990, found reason to believe that Raymond Kravis violated 2 U.S.C. § 441a(a)(3) by making contributions in excess of annual limits.

Additional Violation

2 U.S.C. § 441a(a)(1)(A) limits individual contributions to federal candidates to $1,000 per election.

A review of Mr. Kravis' response and documentation revealed that on March 11, 1988, he made a contribution of $4,000 to the Metzenbaum Senate '88 campaign. Mr. Kravis' check does not contain primary and general election designations nor does it include his spouse's signature as required by 11 C.F.R. §§ 110.1(b)(2) and 110.1(k). Thus, this contribution is in excess of the contribution limitations of Section 441a(a)(1)(A) by $3,000.

Therefore, there is reason to believe that Raymond Kravis violated 2 U.S.C. § 441a(a)(1)(A).

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 11, 1991

Kenneth A. Gross, Esquire
Skadden, Arps, Slate, Meagher & Flom
1440 New York Avenue, N.W.
Washington, D.C. 20005-2107

RE: MUR 3104
Ronald O. Perelman

Dear Mr. Gross:

On August 3, 1990, the Federal Election Commission found reason to believe that your client, Ronald O. Perelman violated 2 U.S.C. § 441a(a)(3), and began an investigation in this matter.

The Commission, on September 26, 1991, denied your client's request for no further action concerning a violation of 2 U.S.C. § 441a(a)(3). At the same time, the Commission found that there is reason to believe your client violated 2 U.S.C. § 441a(a)(1)(A), a provision of the Act. The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against your client. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath.

In the absence of any additional information demonstrating that no further action should be taken against your client, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If your client is 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, the Commission will not entertain requests for pre-probable cause conciliation after briefs on probable cause

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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 the General Counsel ordinarily will not 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 you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Frances B. Hagan, the staff member assigned to this matter, at (202) 219-3400.

Sincerely,

John Warren McGarry
Chairman

Enclosures
Factual and Legal Analysis
Procedures

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Ronald O. Perelman MUR: 3104

Based on allegations in a Los Angeles Times newspaper article, on August 3, 1990, the Commission found reason to believe that Ronald O. Perelman violated 2 U.S.C. § 441a(a)(3) by making contributions in excess of annual limits.

Additional Violation

2 U.S.C. § 441a(a)(1)(A) limits individual contributions to federal candidates to $1,000 per election.

A review of Mr. Perelman's response and documentation revealed that on January 29, 1987, he made a contributaion of $2,000 to the Moynihan Committee, Inc. Mr. Perelman's check is not designated between elections, nor is it partially attributed to his spouse in accordance with 11 C.F.R. §§ 110.1(b)(4) and 110.1(k). Thus, this contribution is in excess of the contribution limitations of 2 U.S.C. § 441a(a)(1)(A) by $1,000.

Respondent argues that this issue not be pursued based on the regulations in effect at the time, an advisory opinion, and the Commission's actions in certain similar enforcement matters. Former 11 C.F.R. § 102.9(e) appeared to allow recipient committees to designate to the general election contributions received prior to the primary election. Soon after Mr. Perelman's contribution was made, the regulation in question was changed to make it consistent with 11 C.F.R. § 110.1. See 52 Fed. Reg. 760 January 9, 1987) (revised to clarify that,

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effective April 8, 1987, only contributors could designate contributions.) Respondent argued that the Moynihan Committee allocated the undesignated primary contribution between the primary and general elections.

Respondent also notes that in Advisory Opinion 1980-67, the Commission cited former regulation 11 C.F.R. § 102.9(e) as support for the recipient committee to redesignate pre-primary contributions between the primary and general elections.

In several enforcement cases dealing with this issue before the regulation was clarified, the Commission took no further action against the recipient political committees when these respondents argued that former Section 102.9(e) allowed designation of contributions by recipient committees. However, in such cases, the Commission did not dismiss the case against contributors based on the regulatory ambiguity, as the regulation applied only to the recipients' actions. See e.g., MUR 1588 (Fenwick for Senate), MUR 1637 (Committee to Re-elect Senator Kennedy), MUR 1648 (Riegle for Senate), MUR 1674 (Harriet Woods for Senate), and MUR 1696 (Citizens for Sarbanes).

Therefore, there is reason to believe that Ronald O. Perelman violated 2 U.S.C. § 441a(a)(1)(A) in this matter.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 11, 1991

Lyn Utrecht, Esquire
Manatt, Phelps & Phillips
1200 New Hampshire Avenue, N.W.
Suite 200
Washington, D.C. 20036

RE: MUR 3104
Ira Riklis

Dear Ms. Utrecht:

On August 3, 1990, the Federal Election Commission found reason to believe that your client, Ira Riklis, violated 2 U.S.C. § 441a(a)(3), and began an investigation in this matter.

The Commission, on September 26, 1991, found that there is reason to believe your client violated 2 U.S.C. § 441a(a)(1)(A), a provision of the Act. The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information. At the same time, the Commission denied at this time your client's request to take no further action or, in the alternative, to enter into conciliation prior to a finding of probable cause to believe regarding the violation of 2 U.S.C. § 441a(a)(3).

Under the Act, you have an opportunity to demonstrate that no action should be taken against your client. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath.

In the absence of any additional information demonstrating that no further action should be taken against your client, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If your client is 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

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so that it may complete its investigation of the matter. Further, the Commission will not entertain requests for pre-probable cause conciliation 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 the General Counsel ordinarily will not 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 you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Frances B. Hagan, the staff member assigned to this matter, at (202) 219-3400.

Sincerely,

John Warren McGarry
Chairman

Enclosures
Factual and Legal Analysis
Procedures

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Ira Riklis MUR: 3104

Based on allegations in a Los Angeles Times newspaper article, the Commission, on August 3, 1990, found reason to believe that Ira Riklis violated 2 U.S.C. § 441a(a)(3) by making contributions in excess of annual limits.

Additional Violations

2 U.S.C. § 441a(a)(1)(A) limits individual contributions to federal candidates to $1,000 per election.

A review of Mr. Riklis' response and documentation revealed that he made the following contributions:

Recipient Committee	Amount	Date of Contribution	Amount of Excessive
Hecht Re-election Comm.	$2,000	3/28/88(88P)	$1,000
	$2,000	3/28/88(88G)	$1,000
Jack Beuchner Comm.	$2,000	4/24/88(88P)	$1,000

Respondent's contributions to the Hecht Committee were designated to the primary and general elections, but were not partially attributed to his spouse pursuant to Commission regulations. See 11 C.F.R. §§ 110.1(b)(2) and (k)(1). In addition, Respondent's contribution to the Beuchner campaign contained no designations or attributions. Thus, these three contributions exceed the contribution limitations of Section 441a(a)(1)(A) by a total of $3,000.

Therefore, there is reason to believe that Ira Riklis violated 2 U.S.C. § 441a(a)(1)(A).

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 11, 1991

Gerald Harris, Esquire
Rubin, Baum, Levin, Constant & Friedman
30 Rockefeller Plaza
New York, NY 10019

RE: MUR 3104
Meshulam Riklis

Dear Mr. Harris:

On August 17, 1990, your client, Meshulam Riklis, was notified that the Federal Election Commission found reason to believe that he violated 2 U.S.C. § 441a(a)(3). On August 31, 1990, Mr. Riklis submitted a response to the Commission's reason to believe finding.

After considering the circumstances of the matter, the Commission determined on September 26, 1991, to take no further action against Mr. Riklis, and closed the file as it pertains to your client. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

The Commission reminds you that the contributions Mr. Riklis made in excess of the 1988 annual limit appear to be in violation of 2 U.S.C. § 441a(a)(3). Your client should take immediate steps to insure that this activity does not occur in the future.

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If you have any questions, please contact Frances B. Hagan, the staff member assigned to this matter, at (202) 219-3400.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 11, 1991

Gregg A. Garmisa, Esquire
Kirkland & Ellis
200 East Randolph Drive
Chicago, Illinois 60601

RE: MUR 3104
Harold C. Simmons

Dear Mr. Garmisa:

On August 3, 1990, the Federal Election Commission found reason to believe that your client, Harold C. Simmons, violated 2 U.S.C. §§ 441a(a)(3) and 441a(a)(1)(C), and began an investigation in this matter.

The Commission, on September 26, 1991, found that there is reason to believe your client violated 2 U.S.C. § 441a(a)(1)(A), a provision of the Act. The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

At your request, on September 26, 1991, the Commission determined to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter, including the Section 441a(a)(1)(A) issue, prior to a finding of probable cause to believe.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If your client agrees with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations prior to a finding of probable cause to believe are limited to a maximum of 30 days, you should respond to this notification as soon as possible.

If you have any questions or suggestions for changes in the agreement, or if you wish to arrange a meeting in connection with

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a mutually satisfactory conciliation agreement, please contact Frances B. Hagan, the staff member assigned to this matter, at (202) 219-3400.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure
Factual and Legal Analysis
Conciliation Agreement
Contribution List

93040934182

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Harold C. Simmons MUR: 3104

Based on allegations in a Los Angeles Times newspaper article, the Commission, on August 3, 1990, found reason to believe that Harold C. Simmons violated 2 U.S.C. § 441a(a)(3) by making contributions in excess of annual limits. The Commission also found that Mr. Simmons violated 2 U.S.C. § 441a(a)(1)(C) by making excessive contributions to a political committee.

Additional Violation

2 U.S.C. § 441a(a)(1)(A) limits individual contributions to federal candidates to $1,000 per election. Pursuant to Commission Regulations, a contribution must be designated in writing for a particular election pursuant to 11 C.F.R. § 110.1(b)(2) or it is presumed to be allocated to the next election. Contributions made by more than one person are to include the signatures of each contributor on the check or in a separate writing. 11 C.F.R. § 110.1(k).

Six thousand dollars ($6,000) in excessive contributions to candidate committees were found during a review of check copies provided by the respondent in answer to the Office of the General Counsel's request for documentation. The contributions were made to the following candidate committees:

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Recipient Committee	Amount	Date of Contribution	Amount of Excessive
Dole for President	$2,000	4/17/87(88P)	$1,000
Hatch Election Comm.	$2,000	4/21/87(88P)	$1,000
Hecht Re-election Comm.	$4,000	4/24/87(88P)	$1,000
		(88G)	$1,000
Friends of Dick Armey	$2,000	5/22/87(88P)	$1,000
Montoya for U.S. Senate	$2,000	3/07/88(88P)	$1,000

Respondent's check copies or accompanying documents showed that all of these contributions lacked the proper election designation or the signature of Mr. Simmons' spouse. Thus, these additional contributions exceed the contributions limitations of Section 441a(a)(1)(A) by a total of $6,000.

Therefore, there is reason to believe that Harold C. Simmons violated 2 U.S.C. § 441a(a)(1)(A).

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HAROLD SIMMONS

LAST	FIRST	AMOUNT	P/G	YOE	DATE	CANDIDATE/CMTE
SIMMONS	HAROLD	$100.00	P	88	27-MAR-1987	BARTLETT, STEVE CONG.
SIMMONS	HAROLD	$1,000.00	P	88	30-MAR-1987	BENTSEN, SEN LLOYD
SIMMONS	HAROLD	$1,000.00	P	88	01-APR-1987	DU PONT/PRES
SIMMONS	HAROLD	$2,000.00	P	88	17-APR-1987	DOLE/PRES
SIMMONS	HAROLD	$2,000.00	P	88	21-APR-1987	HATCH ELECT CMTE
SIMMONS	HAROLD	$1,000.00	P	88	22-APR-1987	BARTON, CONGMAN JOE
SIMMONS	HAROLD	$5,000.00	P	88	23-APR-1987	WTW REELECT CMT [JT F/R]
SIMMONS	HAROLD	$4,000.00	P/G	88	24-APR-1987	HECHT REELECT CMTE
SIMMONS	HAROLD	$2,000.00	P	88	22-MAY-1987	ARMEY, FR OF DICK
SIMMONS	HAROLD	$500.00	P	88	26-MAY-1987	ORTIZ FR CONG
SIMMONS	HAROLD	$500.00	P	88	09-JUN-1987	MCEWEN '88
SIMMONS	HAROLD	($250.00)	P	88	30-JUN-1987	DOLE/PRES
SIMMONS	HAROLD	$1,000.00	P	88	01-OCT-1987	BOULTER, BEAU TX FOR
SIMMONS	HAROLD	$500.00	P	88	20-OCT-1987	BUSH, GEORGE PRES
SIMMONS	HAROLD	$875.00	P	88	26-OCT-1987	BARTLETT, STEVE CONG
SIMMONS	HAROLD	$1,000.00	P	88	27-OCT-1987	KARNES, FR OF SEN DA
SIMMONS	HAROLD	($833.00)	P	88	19-NOV-1987	TRIBLE, FR OF PAUL
SIMMONS	HAROLD	$2,000.00	P/G	88	20-JAN-1988	LUGAR, FR OF DICK
SIMMONS	HAROLD	$2,000.00	P	88	26-JAN-1988	NRSC
SIMMONS	HAROLD	$1,000.00	G	88	29-JAN-1988	BARTLETT, STEVE CONG
SIMMONS	HAROLD	$1,000.00	P	88	29-JAN-1988	DINGELL, JOHN FR CON
SIMMONS	HAROLD	$1,000.00	P	88	03-FEB-1988	MARKEY FR CONG
SIMMONS	HAROLD	$1,000.00	P	88	08-FEB-1988	DAWKINS, PETE FR SEN
SIMMONS	HAROLD	$500.00	P	88	11-FEB-1988	DANFORTH FR SEN
SIMMONS	HAROLD	$1,000.00	P	88	16-FEB-1988	GORE, ALBERT PRES
SIMMONS	HAROLD	$5,000.00	P	88	18-FEB-1988	CONSERV ACTNG FOR TX
SIMMONS	HAROLD	($166.00)	P	88	18-FEB-1988	TRIBLE, FR OF PAUL
SIMMONS	HAROLD	$1,000.00	P	88	22-FEB-1988	VOINOVICH FR OF
SIMMONS	HAROLD	$2,000.00	P	88	07-MAR-1988	MONTOYA FR US SEN CM
SIMMONS	HAROLD	$1,000.00	R	88	28-MAR-1988	BOULTER, TEXAN FR BE
SIMMONS	HAROLD	$5,000.00	P	88	28-MAR-1988	KIRKLAND & ELLIS PAC
SIMMONS	HAROLD	$1,000.00	G	88	29-APR-1988	MICHEL FOR CONG
SIMMONS	HAROLD	$1,000.00	P	88	10-MAY-1988	HAIG FOR PRES
SIMMONS	HAROLD	$100.00	P	88	25-MAY-1988	RNC
SIMMONS	HAROLD	$2,000.00	P	88	31-MAY-1988	JEFFORDS-MACK VIC CM
SIMMONS	HAROLD	$1,000.00	G	88	31-MAY-1988	SMITH, FR OF DENNY
SIMMONS	HAROLD	$500.00	G	88	02-JUN-1988	BUSH, G. PRES [COMPL.]
SIMMONS	HAROLD	$500.00	P	88	28-JUN-1988	SYNAR, MIKE FR CONG
SIMMONS	HAROLD	$5,000.00	P	88	30-JUN-1988	CONSERV VICTORY CMTE
SIMMONS	HAROLD	$500.00	G	88	30-JUN-1988	WILLIAMS CONG 88
SIMMONS	HAROLD	$1,000.00	G	88	30-JUN-1988	WILSON, CAL FOR PETE
SIMMONS	HAROLD	$1,000.00	G	88	13-JUL-1988	BARTON, CONG JOE
SIMMONS	HAROLD	$1,000.00	P	88	18-JUL-1988	GORTON, FR OF SLADE
SIMMONS	HAROLD	$1,000.00	G	88	22-JUL-1988	HEINZ, PEOPLE FR JOH
SIMMONS	HAROLD	$5,000.00	P	88	12-AUG-1988	CONSERV ACT FR TEXAN
SIMMONS	HAROLD	$1,000.00	G	88	30-SEP-1988	BRYANT,JOHN CAMP CMT
SIMMONS	HAROLD	$100.00	G	88	08-DEC-1988	RNC
SIMMONS	HAROLD	$500.00	G	88	25-DEC-1988	DAWKINS, PETE FR SEN
SIMMONS	HAROLD	$1,000.00	G	88	11-JAN-1989	KARNES,FRIENDS OF DA
SIMMONS	HAROLD	$1,000.00	P	88	19-MAY-1989	SMITH,FRIENDS OF DEN
SIMMONS	HAROLD	$1,000.00	G	88	20-JUN-1989	MACK,FRIENDS OF CONN
	TOTAL	$69,926.00				

LAST	FIRST	AMOUNT	P/G	YOE	DATE	CANDIDATE/CMTE
SIMMONS	HAROLD	$250.00	P	89	08-FEB-1989	TEXAS REP CONGR. CMT
SIMMONS	HAROLD	$1,000.00	P	89	17-APR-1989	NAT'L REP SEN CMT
SIMMONS	HAROLD	$15,000.00	p	89	06-JUN-1989	DSCC
SIMMONS	HAROLD	$5,000.00	P	89	14-NOV-1989	CONTRAN PAC
SIMMONS	HAROLD	$5,000.00	P	89	17-NOV-1989	SMALLBUSINESS PAC
	TOTAL	$26,250.00				

93040934186

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 11, 1991

J. Curtis Herge, Esquire
Herge, Sparks, Christopher & Biondi
Suite 200
8201 Greensboro Drive
McLean, Virginia 22102

RE: MUR 3104
Donald J. Trump

Dear Mr. Herge:

On August 3, 1990, the Federal Election Commission found reason to believe that your client, Donald J. Trump, violated 2 U.S.C. § 441a(a)(3), and began an investigation in this matter. The Commission, on September 26, 1991, denied your client's request to take no further action concerning this violation.

Therefore, absent a request for settlement of this matter through conciliation prior to a finding of probable cause to believe, the Office of the General Counsel will proceed to the next stage of the enforcement process.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

9304093418 7

OGC 3234

SKADDEN, ARPS, SLATE, MEAGHER & FLOM
1440 NEW YORK AVENUE, N.W.
WASHINGTON, D.C. 20005-2107
(202) 371-7000

FAX (202) 393-5760
DIRECT DIAL
(202) 371-

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LOS ANGELES
NEW YORK
SAN FRANCISCO
SYDNEY
TOKYO
TORONTO
WILMINGTON

October 24, 1991

BY HAND

Lawrence M. Noble, Esq.
General Counsel
Federal Election Commission
999 E Street, Northwest
Washington, D.C. 20463
Attn: Lisa Klein
Fran Hagan

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
91 OCT 24 PM 4:04

Re: MUR 3104
Ronald O. Perelman

Dear Mr. Noble:

On October 15, 1991, we received notification that the Commission had found reason to believe that Ronald O. Perelman violated 2 U.S.C. § 441a(a)(1)(A) for making an excessive contribution to The Moynihan Committee. We request a ten day extension of time to file our response to that finding. To file a further response in this matter, we must review activity that occurred almost five years ago and additional time is required to fully conduct this review.

Thank you for your consideration of this request.

Sincerely,

Kenneth A. Gross

9304093418 8

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 28, 1991

Kenneth A. Gross, Esquire
Skadden, Arps, Slate, Meagher & Flom
1440 New York Avenue, N.W.
Washington, D.C. 20002-2107

RE: MUR 3104
Ronald O. Perelman

Dear Mr. Gross:

This is in response to your letter dated October 24, 1991, which we received the same day, requesting an extension of 10 days to respond to the Commission's latest reason to believe finding. After considering the circumstances presented in your letter, I have granted the requested extension. Accordingly, your response is due by the close of business on November 12, 1991.

If you have any questions, please contact Frances B. Hagan, the staff member assigned to this matter, at (202) 219-3400.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lisa E. Klein
Assistant General Counsel

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MUR 3104

RECEIVED
FEDERAL ELECTION COMMISSION
MAIN COPY ROOM
91 OCT 28 AM 11:01

KIRKLAND & ELLIS
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

200 East Randolph Drive
Chicago, Illinois 60601

312 861-2000

Facsimile:
312 861-2200

Gregg A. Garmisa
To Call Writer Direct:
312-861-2193

October 24, 1991

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
91 OCT 28 AM 11:21

Frances B. Hagan
Staff Attorney
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Dear Fran:

This is to acknowledge your agreement in our telephone conference today that the 30-day period for pre-probable cause conciliation began to run on October 15, 1991, the date on which I received the FEC's October 11, 1991 letter, and that the 30-day negotiation period can be extended by agreement of the FEC and Mr. Simmons.

Sincerely,

Gregg A. Garmisa

GAG:kvs

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FEDERAL ELECTION COMMISSION
MAIL COPY ROOM

LAW OFFICES
WUNDER, DIEFENDERFER, RYAN, CANNON & THELEN
1615 L STREET, N.W., SUITE 650
WASHINGTON, D. C. 20036

(202) 659-3005
FACSIMILE: (202) 659-3010

91 OCT 28 AM 11:08

October 24, 1991

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
91 OCT 28 AM 8:20

Lawrence Noble, Esq.
General Counsel's Office
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Re: MUR 3104
Raymond Kravis

Attn: Francis Hagan

Dear Ms. Hagan:

Pursuant to your letter of October 11, 1991, please accept this letter as a formal request to enter into pre-probable cause conciliation regarding all matters involving Raymond Kravis in the above referenced MUR.

Should you have any questions regarding this matter, please contact me at your convenience.

Very truly yours,

Kenneth S. Levine

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OBC 3486

SKADDEN, ARPS, SLATE, MEAGHER & FLOM
1440 NEW YORK AVENUE, N.W.
WASHINGTON, D.C. 20005-2107
(202) 371-7000

FAX (202) 393-5760
DIRECT DIAL
(202) 371-

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RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE SERVICES BR.
91 NOV 12 PM 4:

November 12, 1991

BY HAND

Lawrence M. Noble, Esq.
General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463
Attn: Lisa Klein
Fran Hagan

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE SERVICES BRANCH
91 NOV 12 PM 4:59

Re: MUR 3104
Ronald O. Perelman

Dear Mr. Noble:

This letter is in response to the Federal Election Commission's September 26, 1991 finding that the Respondent in this matter violated 2 U.S.C. § 441a(a)(1)(A) by making a $1,000 excessive contribution to The Moynihan Committee, Inc.

The purpose of this response is not to reiterate the arguments we have already made but to draw attention to the shortcomings of the Commission's basis for its reason to believe finding. Inexplicably, the analysis of the Commission in its finding merely mentions that the Respondent cites Advisory Opinion 1980-67, 1 Fed. Camp. Fin. Guide ¶ 5527 (Aug. 12, 1980), as a basis for dismissal, but does not discuss the substance of the advisory opinion, and ignores the significant precedent 1980-67 established. The Commission's reason to believe finding in this case rests solely on the Commission's conclusion that the enforcement actions we cited in our August 14, 1991 response cannot be relied upon because the regulatory "ambiguity" contained in former section 102.9(e) did not result in the dismissal of the FEC's cases against the contributors; it only resulted in the dismissal against the recipients of contributions.

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OFFICE OF GENERAL COUNSEL
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The Commission cannot ignore the unequivocal precedent of AO 1980-67. In AO 1980-67, the requestor asked whether an individual could make a $2,000 pre-primary contribution to a candidate by check written on a joint checking account, but signed by only one individual. The Commission's response cited former section 102.9(e) as the basis for finding that if a contributor makes a $2,000 contribution prior to a primary election, the candidate or his authorized committee may designate $1,000 of that contribution to the primary election and $1,000 for the general election. AO 1980-67, 1 Fed. Camp. Fin. Guide ¶ 5527 at 10,621.

AO 1980-67 concludes that the candidate may redesignate the contribution without contributor consent. Specifically, the advisory opinion contrasts the recipient redesignation of a contribution from the primary to the general election under former section 102.9(e), which did not require contributor action, to the spousal reattribution rule, which did require contributor action.

While the Commission acknowledged in the MURs cited in our previous response that former section 102.9(e) was defective, the Commission found violations against contributors anyway. The contributors in those cases, however, were not individuals; they were reporting entities under the Federal Election Campaign Act, i.e., labor union PACs, and it is this fact that accounts for the Commission's findings. When confronted with cases involving individual contributors making alleged excessive contributions involving the application of former section 102.9(e), the Commission dismissed the cases against those contributors. See MURs 2127 and 2543. In MUR 2127, the Commission declined to find reason to believe against five individuals who made undesignated contributions to a candidate in excess of $1,000 prior to the primary election. Similarly, in MUR 2543 the Commission found reason to believe and took no further action against two individuals in precisely the same situation as in this case.

As a matter of consistent practice, the Commission imposes a greater burden on political committees which have FEC filing obligations than on individual contributors who do not. This case falls squarely within

9304093411 93

the Commission's finding in AO 1980-67 and the treatment of the contributors in MURs 2127 and 2543. The situations in those instances are parallel to the circumstances in this case because the contributor in this case and the contributors in those instances are individuals.

There is no legal basis for the Commission to pursue this legally flawed and aged case. We request that it go no further and that the entire matter be dismissed.

Sincerely,

Kenneth A. Gross

9304093411 94

[redacted]

MUR 3104

NAME OF COUNSEL: Robert F. Bauer, Esq.

ADDRESS: Perkins Coie

607 Fourteenth Street, NW - Suite 800

Washington, DC 20005-2011

TELEPHONE: 202/628-6600

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.

11/19/91
Date

Dorothy Ivan Andreas
Signature

RESPONDENT'S NAME: Dorothy Ivan Andreas

ADDRESS: c/o Archer Daniels Midland Company

PO Box 1470

Decatur, IL 62525

HOME PHONE: 217-424-5534

BUSINESS PHONE: 217/424-5200

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
91 NOV 20 AM 11:35

93004093341195

06 c 348

STATEMENT OF DESIGNATION OF COUNSEL

MUR 3104

NAME OF COUNSEL: Robert F. Bauer, Esq.

ADDRESS: Perkins Coie

607 Fourteenth Street, NW - Suite 800

Washington, DC 20005-2011

TELEPHONE: 202/628-6600

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
91 NOV 20 AM 11:35

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.

11/19/91
Date

D O Andreas
Signature

RESPONDENT'S NAME: Dwayne Andreas

ADDRESS: c/o Archer Daniels Midland Company

PO Box 1470

Decatur, IL 62525

HOME PHONE:

BUSINESS PHONE: 217/424-5200

9304093419 96

SENT BY:PERKINS COIE DC 3 ; 11-19-91 ; 8:44 ; 2024341680+ ;# 2

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 6, 1991

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Robert F. Bauer, Esquire
Perkins Coie
607 Fourteenth Street, N.W., Suite 800
Washington, D.C 20005-2011

RE: MUR 3104
Dwayne O. Andreas
Dorothy Inez Andreas

Dear Mr. Bauer:

On October 11, 1991, your clients were notified that, at their request, the Federal Election Commission determined to enter into negotiations directed toward reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe. On that same date they were sent conciliation agreements offered by the Commission in settlement of this matter.

Please note that conciliation negotiations entered into prior to a finding of probable cause to believe are limited to a maximum of 30 days. To date, you have not responded to the proposed agreements on behalf of your clients. The 30 day period for negotiations has expired. Unless we receive a response from you within five days, this Office will consider these negotiations terminated and will proceed to the next stage of the enforcement process.

Should you have any questions, please contact Frances B. Hagan, the staff member assigned to this matter, at (202) 219-3400.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lisa E. Klein
Assistant General Counsel

9304093419 7

RECEIVED
FEC
91 DEC -9 AM 11: 14

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 3104
Raymond Kravis, Ira Riklis,)
Caroline Rose Hunt, et.al.)
)

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On August 3, 1990, the Commission found reason to believe that Raymond Kravis, Ira Riklis, and Caroline Rose Hunt violated 2 U.S.C. § 441a(a)(3) by making contributions in excess of the 1988 annual limit. On September 26, 1991, the Commission found reason to believe that Mr. Kravis and Mr. Riklis violated 2 U.S.C. § 441a(a)(1)(A) by making excessive contributions to candidate committees. By letter and telephone request, Mr. Kravis and Mr. Riklis subsequently requested resolution of these matters through pre-probable cause conciliation.[1] On September 26, 1991, the Commission also approved Ms. Hunt's request for conciliation prior to a probable cause finding.

II. ANALYSIS

For analysis of issues concerning Mr. Kravis, Mr. Riklis, and Ms. Hunt, see the General Counsel's Report dated September 17, 1991.

III. DISCUSSION OF CONCILIATION PROVISIONS AND CIVIL PENALTY

1. The Office of the General Counsel will make recommendations regarding other respondents in this case as appropriate.

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IV. RECOMMENDATIONS

1. Enter into conciliation with the following prior to a finding of probable cause to believe:

   a) Raymond Kravis;
   b) Ira Riklis.

2. Approve the attached proposed conciliation agreements.

3. Accept the attached signed conciliation agreement with Caroline Rose Hunt.

4. Close the file as it pertains to Caroline Rose Hunt.

5. Approve the appropriate letters.

Lawrence M. Noble
General Counsel

12/6/91
Date

BY: _____
Lois G. Lerner
Associate General Counsel

Attachments
A. Requests for conciliation
B. Proposed Conciliation Agreements (2)
C. Signed Conciliation Agreement

Staff assigned: Frances B. Hagan

93040934200

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS /DONNA ROACH DR
COMMISSION SECRETARY

DATE: DECEMBER 11, 1991

SUBJECT: MUR 3104 - GENERAL COUNSEL'S REPORT
DATED DECEMBER 6, 1991

93040934201

The above-captioned document was circulated to the Commission on MONDAY, DECEMBER 9, 1991 at 4:00 P.M.

Objection(s) have been received from the Commissioner(s) as indicated by the name(s) checked below:

Commissioner Aikens	
Commissioner Elliott	XXX
Commissioner Josefiak	
Commissioner McDonald	
Commissioner McGarry	
Commissioner Thomas	

This matter will be placed on the meeting agenda for THURSDAY, DECEMBER 19, 1991.

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

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 3104
Raymond Kravis; Ira Riklis; Caroline Rose Hunt; et. al.	)	

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on December 19, 1991, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 3104:

1. Enter into conciliation with Raymond Kravis and Ira Riklis prior to a finding of probable cause to believe.

2. Approve the proposed conciliation agreements attached to the General Counsel's report dated December 6, 1991

3. Accept the signed conciliation agreement with Caroline Rose Hunt as recommended in the General Counsel's report dated December 6, 1991.

4. Close the file as it pertains to Caroline Rose Hunt.

(continued)

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5. Approve the appropriate letters as recommended in the General Counsel's report dated December 6, 1991.

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

Attest:

12-24-91
Date

Marjorie W. Emmons
Secretary of the Commission

9304093420 3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 13, 1992

C. Jedson Nau, Esquire
100 Crescent Court
Suite 1700
Dallas, Tx 75201

RE: MUR 3104
Caroline Rose Hunt

Dear Mr. Nau:

On December 19, 1991, the Federal Election Commission accepted the signed conciliation agreement submitted on your client's behalf in settlement of a violation of 2 U.S.C. § 441a(a)(3), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter as it pertains to your client.

This matter will become a part of the public record within 30 days after it has been closed with respect to all other respondents involved. 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 that 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.

The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

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Enclosed you will find a copy of the fully executed conciliation agreement for your files. Please note that the civil penalty is due within 30 days of the conciliation agreement's effective date. If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Noriega E. James

Noriega E. James
Paralegal

Enclosure
Conciliation Agreement

9304093420 5

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Caroline Rose Hunt	)	MUR 3104
	)	

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission ("Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. On August 30, 1990, the Commission found reason to believe that Caroline Rose Hunt ("Respondent") violated 2 U.S.C. § 441a(a)(3).

NOW, THEREFORE, the Commission and the Respondent, having participated in informal methods of conciliation prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondent and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 2 U.S.C. § 437g(a)(4)(A)(i).

II. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondent enters voluntarily into this agreement with the Commission.

IV. The pertinent facts in this matter are as follows:

1. Respondent Caroline Rose Hunt is an individual contributor to political committees for the 1988 elections.

2. 2 U.S.C. § 441a(a)(3) limits total contributions by an individual in any calendar year to $25,000. 11 C.F.R.

9304093420 6

§ 110.5(c)(2) states that any contribution to a candidate or authorized committee with respect to a particular election made in a non-election year shall be considered to be made during the calendar year in which such election is held.

3. The FEC review of contributions made for the 1988 elections revealed that respondent made contributions totaling $28,150 or $3,150 in excess of the annual limit.

4. At respondent's request, on April 30, 1990, respondent received a refund of $4,500.

V. Respondent made contributions in excess of the annual contribution limit for 1988 in violation of 2 U.S.C. § 441a(a)(3). Respondent contends that the violation was not knowing and willful.

VI. Respondent will pay a civil penalty to the Federal Election Commission in the amount of eight hundred dollars ($800), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VII. 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.

VIII. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

IX. Respondent shall have no more than 30 days from the date

93040934207

this agreement becomes effective to comply with and implement the requirement contained in this agreement and to so notify the Commission.

X. 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

BY: Lois G. Lerner
Lois G. Lerner
Associate General Counsel

Date 1/13/92

FOR THE RESPONDENT:

Caroline Rose Hunt
(Name)
(Position)

Date

9304093420 8

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 13, 1992

Kenneth S. Levine, Esquire
Paul Sullivan, Esquire
Wunder, Ryan, Cannon & Thelen
1615 L Street, N.W., Suite 650
Washington, DC 20036

RE: MUR 3104
Raymond Kravis

Dear Mr. Levine and Mr. Sullivan:

On August 3, 1990, and September 26, 1991, the Federal Election Commission found reason to believe that Raymond Kravis violated 2 U.S.C. §§ 441a(a)(3) and 441a(a)(1)(A), respectively. At your request, on December 19, 1991, the Commission determined to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If your client agrees with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible.

If you have any questions or suggestions for changes in the agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact me at (202) 219-3400.

Sincerely,

Noriega E. James
Paralegal

Enclosure
Conciliation Agreement

9304093342209

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 13, 1992

Lyn Utrecht, Esquire
Manatt, Phelps & Phillips
1200 New Hampshire Avenue, N.W.
Suite 200
Washington, DC 200036

RE: MUR 3104
Ira Riklis

Dear Ms. Utrecht:

On August 3, 1990, and September 26, 1991, the Federal Election Commission found reason to believe that Ira Riklis violated 2 U.S.C. §§ 441a(a)(3) and 441a(a)(1)(A), respectively. At your request, on December 19, 1991, the Commission determined to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If your client agrees with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible.

If you have any questions or suggestions for changes in the agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact me at (202) 219-3400.

Sincerely,

Noriega E. James
Paralegal

Enclosure
Conciliation Agreement

9304093421O

MUR 3806

WUNDER, DIEFENDERFER, RYAN, CANNON & THELEN
1615 L STREET, N.W., SUITE 650
WASHINGTON, D. C. 20036
(202) 659-3005

KENNETH S. LEVINE

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM
91 DEC 16 AM 10:54

December 13, 1991

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
91 DEC 16 PM 3:58

Lawrence Noble, Esquire
General Counsel's Office
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 3104
Raymond Kravis

ATTN: Francis Hagan

Dear Ms. Hagan:

On October 11, 1991, Chairman McGarry informed me by letter that the Federal Election Commission on September 26, 1991, found that there is reason to believe that my client, Raymond Kravis, violated 2 U.S.C. § 441a(a)(1)(A).

I have recently obtained copies of records kept by the Metzenbaum for Senate campaign which show that the contribution in question was properly attributed and designated by Mr. Kravis and his wife, Bessie, in the appropriate amounts to the appropriate general and primary campaigns. Therefore, it appears that there is no violation of 2 U.S.C. § 441a(a)(1)(A).

I enclose copies of the new information recently obtained from the Metzenbaum for Senate campaign for your review. If you have any questions, please let me know. I look forward to hearing from you on this matter in the near future.

Sincerely,

Kenneth S. Levine

KSL/wkc
Enclosures

9304093421 1

Metzenbaum for Senate

Post Office Box 75113, Washington, D.C. 20013

March, 1988

CONTRIBUTION VERIFICATION

In order to comply with Federal Election Commission regulations, the Metzenbaum for Senate Committee requests you to complete, sign and return in the enclosed self addressed envelope the following:

My contribution in the amount of $2000- is to be divided in the following manner:

$1000- to the Primary

$1000- to the General

$2000- Total

Raymond F. Kravis

Must be personally signed by the contributor

Thank you.

Raymond Kravis

9304093421 2

Paid for by the Metzenbaum for Senate Committee

Metzenbaum for Senate

Post Office Box 75113, Washington, D.C. 20013

March, 1988

CONTRIBUTION VERIFICATION

In order to comply with Federal Election Commission regulations, the Metzenbaum for Senate Committee requests you to:

1. ___ Verify and correct the information presented below.

2. ___ Add any missing information

3. ___ Personally sign the affidavit at the bottom of the form. (All checks must be personally signed by the contributor.)

4. X The signature of your spouse is necessary along with information requested to indicate that he/she has willingly contributed to the Metzenbaum for Senate Campaign.

PLEASE INDICATE ADDITIONS/CORRECTIONS (PLEASE PRINT)

TITLE Raymond Kravis NAME

ADDRESS 2109 E. 30 Pl.

CITY Tulsa STATE OK ZIP 74114

TELEPHONE 918-742-3294

OCCUPATION Investor

COMPANY NAME self

CITY Tulsa STATE Okla. ZIP 74114

AMOUNT OF CONTRIBUTION $ 2000 - Raymond - Raymond F. Kravis
2000 - Bessie CONTRIBUTION

The contribution set forth above:

A. Represents my personal funds, the giving of which represents no violation of any trust or escrow agreement; and

B. Has not been drawn on an account maintained by an incorporated entity.

Must be personally signed by the contributo

Please return as soon as possible in the enclosed self addressed envelope.
Thank you.

Paid for by the Metzenbaum for Senate Committee

930409342213

218 522 7272 11-22-91 09:43AM P002 #16

Metzenbaum for Senate

Post Office Box 75113, Washington, D.C. 20013

March, 1988.

CONTRIBUTION VERIFICATION

In order to comply with Federal Election Commission regulations, the Metzenbaum for Senate Committee requests you to complete, sign and return in the enclosed self addressed envelope the following:

My contribution in the amount of $ 2000 - is to be divided in the following manner:

$ 1000 - to the Primary

$ 1000 - to the General

$ 2000 - Total

Bessie R Kramis

Must be personally signed by the contributor

93040934214

Thank you.
Bessie Kramis

Paid for by the Metzenbaum for Senate Committee

MUR 3943

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM
91 DEC 30 AM 9:01

KIRKLAND & ELLIS
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

200 East Randolph Drive
Chicago, Illinois 60601

312 861-2000

Facsimile:
312 861-2200

Philip S. Beck
To Call Writer Direct:
312 861-2388

December 26, 1991

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
92 JAN -2 AM 10:42

Noriega James, Esq.
Federal Election Commission
Washington, D.C. 20463

Re: MUR 3104 -- Harold Simmons

Dear Mr. James:

Enclosed are two signed copies of the conciliation agreement in the above-referenced matter. Please have one copy signed and returned to me.

Sincerely,

Philip S Beck

Philip S. Beck

PSB/nf
Enclosures

9304093421 5

RECEIVED
F.E.C.
SECRETARIAT
92 JAN 13 PM 2:48

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

SENSITIVE

January 13, 1992

MEMORANDUM

TO: The Commission

FROM: Lawrence M. Noble
General Counsel

SUBJECT: MUR 3104 - Donald J. Trump

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 were mailed on January 13, 1992. 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 respondent

9304093421 6

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 13, 1992

J. Curtis Herge, Esquire
Herge, Sparks, Christopher & Biondi
8201 Greensboro Drive, Suite 200
McLean, Virginia 22102

RE: MUR 3104
Donald J. Trump

Dear Mr. Herge:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, on August 3, 1990, the Federal Election Commission found reason to believe that your client, Donald J. Trump, violated 2 U.S.C. § 441a(a)(3), and instituted an investigation in 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 a violation has occurred.

The Commission may or may not approve the General Counsel's recommendation. 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 (ten 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.

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.

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Should you have any questions, please contact Noriega James, the staff member assigned to this matter, at (202) 219-3400.

Sincerely,

Lawrence M. Noble
General Counsel

Enclosure
Brief

93040934218

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 3104
Donald J. Trump)

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

Based on allegations in a Los Angeles Times newspaper article, the Commission found reason to believe that Donald J. Trump violated 2 U.S.C. § 441a(a)(3) by making contributions in excess of annual limits. Mr. Trump has responded to the Commission's finding and to discovery requests. The Office of the General Counsel thoroughly analyzed the response, reviewed check copies and other documentation submitted, and compared information in the response with items on disclosure reports.

II. ANALYSIS

2 U.S.C. § 441a(a)(3) limits total contributions by an individual in any calendar year to $25,000. The statute also states that any contribution made to a candidate in a year other than the calendar year in which the election is held with respect to which such contribution is made, is considered to be made during the calendar year in which such election is held.

11 C.F.R. § 110.5(c)(2) states that any contribution to a candidate or authorized committee with respect to a particular election made in a non-election year shall be considered to be made during the calendar year in which such election is held.

The FEC review of contributions made for the 1988 elections revealed that respondent made contributions totaling $72,050, or

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$47,050 in excess of the annual limit. On December 21 and 30, 1988, respondent received refunds from two party committees totaling $25,000. The refunds were not timely pursuant to 11 C.F.R. § 103.3(b).

Counsel for respondent Trump asserted that the Commission should take no further action against Mr. Trump for violating 2 U.S.C. § 441a(a)(3) on the grounds that Mr. Trump attempted to take remedial action with regard to this violation before formal Commission action. Apparently, Mr. Trump was advised by his counsel that the statute imposed a $25,000 calendar year contribution limit. Counsel allegedly failed to advise Mr. Trump of the very next statutory sentence which unambiguously states that any contribution made to a federal candidate in a non-election year will be considered to be made during the calendar year in which such election is held. See 2 U.S.C. § 441a(a)(3). Inaccurate legal advice does not vitiate the violation and does not warrant a finding of no further action with regard to this violation. Accordingly, on September 26, 1991, the Commission rejected respondent's request to take no further action in this matter.

Therefore, based on the evidence of excessive contributions made by the respondent, the Office of the General Counsel is prepared to recommend that the Commission find probable cause to believe that Donald J. Trump violated 2 U.S.C. § 441a(a)(3) in this matter.

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III. GENERAL COUNSEL'S RECOMMENDATION

Find probable cause to believe that Donald J. Trump violated 2 U.S.C. § 441a(a)(3).

Date 1/10/92

Lawrence M. Noble
General Counsel

93040093422 1

FAXED 1-22-92

HERGE, SPARKS, CHRISTOPHER & BIONDI

ATTORNEYS AT LAW

SUITE 200

8201 GREENSBORO DRIVE

MCLEAN, VIRGINIA 22102

(703) 848-4700

J. CURTIS HERGE
ROBERT R. SPARKS, JR.
A. MARK CHRISTOPHER
GEORGE V. BIONDI
MATTHEW SCOTT McCONNELL

TELECOPIER NUMBER
(703) 893-7371

January 22, 1992

Lawrence M. Noble, Esq.
General Counsel
Federal Election Commission
999 K Street, N.W.
Washington, D. C. 20463

Attention: Noriega James
Office of General Counsel

Re: MUR 3104
Donald J. Trump

Dear Mr. Noble:

We are writing with reference to your letter, dated January 13, 1992, in which you reported that the Office of the General Counsel is prepared to recommend that the Federal Election Commission find probable cause to believe that a violation occurred in the above-captioned matter.

Due to the schedule of our client and his advisors and our need to communicate with our client about our responsive brief, we respectfully request an extension until Tuesday, February 11, 1992, within which to file our brief with the Secretary of the Commission.

Sincerely,

J. Curtis Herge

J. Curtis Herge

:slc

cc: Donald J. Trump

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RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

92 JAN 23 AM 10:54

RECEIVED
F.E.C.
SECRETARIAT

BEFORE THE FEDERAL ELECTION COMMISSION

2000 JAN 24 AM 10:00

In the Matter of)
) MUR 3104
Harold Simmons)

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a conciliation agreement which has been signed by Philip S. Beck, counsel for Harold Simmons.

9304093422 23

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II. RECOMMENDATIONS

1. Accept the attached conciliation agreement with Harold Simmons.

2. Close the file as to this respondent.

3. Approve the appropriate letter.

Lawrence M. Noble
General Counsel

Date 1/23/92

BY: _____
Lois G. Lerner
Associate General Counsel

Attachment
Conciliation Agreement

Staff Assigned: Noriega E. James

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Harold Simmons.) MUR 3104

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on January 28, 1992, the Commission decided by a vote of 6-0 to take the following actions in MUR 3104:

1. Accept the conciliation agreement with Harold Simmons, as recommended in the General Counsel's Report dated January 23, 1992.

2. Close the file as to this respondent.

3. Approve the appropriate letter, as recommended in the General Counsel's Report dated January 23, 1992.

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

Attest:

1-28-92
Date

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

Received in the Secretariat: Fri., Jan. 24, 1992 10:00 a.m.
Circulated to the Commission: Fri., Jan. 24, 1992 12:00 p.m.
Deadline for vote: Tues., Jan. 28, 1992 4:00 p.m.

dr

9304093425

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 3, 1992

Phil Beck, Esquire
Kirkland & Ellis
200 East Randolph Drive
Chicago, IL 60601

RE: MUR 3104
Harold C. Simmons

Dear Mr. Beck:

On January 28, 1992, the Federal Election Commission accepted the signed conciliation agreement submitted on your client's behalf in settlement of violations of 2 U.S.C. §§ 441a(a)(1)(A) and (C), and 441a(a)(3), provisions of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter as it pertains to your client.

This matter will become a part of the public record within 30 days after it has been closed with respect to all other respondents involved. 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 that 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.

The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

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Enclosed you will find a copy of the fully executed conciliation agreement for your files. Please note that the civil penalty is due within 30 days of the conciliation agreement's effective date. If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Noriega E. James
Paralegal

Enclosure
Conciliation Agreement

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Harold C. Simmons	)	MUR 3104
	)	

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission ("Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that Harold C. Simmons ("Respondent") violated 2 U.S.C. §§ 441a(a)(1)(A) and (C), and 441a(a)(3).

NOW, THEREFORE, the Commission and the Respondent, having participated in informal methods of conciliation prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondent and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 2 U.S.C. § 437g(a)(4)(A)(i).

II. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondent enters voluntarily into this agreement with the Commission.

IV. The pertinent facts in this matter are as follows:

1. Respondent Harold C. Simmons is an individual contributor to candidates for federal office.

2. 2 U.S.C. § 441a(a)(3) limits total contributions by

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an individual in any calendar year to $25,000. 11 C.F.R. § 110.5(c)(2) states that any contribution to a candidate or authorized committee with respect to a particular election made in a non-election year shall be considered to be made during the calendar year in which such election is held.

3. The FEC review of contributions made for the 1988 elections revealed that respondent made contributions totaling $69,926 or $44,926 in excess of the annual limit. Respondent's contributions during 1989 totaled $26,250, or $1,250 in excess of the annual limit.

4. Respondent contends that he did not realize that contributions actually made in 1987 and 1989 would count as 1988 contributions if they were made with respect to the 1988 election. Respondent contends that he and his wife intended half his contributions to be attributable to his wife, and several checks bear notations to this effect. However, her signature did not appear on the checks or accompanying documents as required under 11 C.F.R. 110.1(k).

5. Before notification by the FEC that his contributions exceeded the annual limits, respondent sought refunds from certain recipients. Between May and December 1990, respondent received refunds totaling $20,000.

6. 2 U.S.C. § 441a(a)(1)(A) limits individual contributions to federal candidates to $1,000 per election. A review of contributions and check copies provided by the respondent revealed that during 1988, the respondent made contributions to five candidate committees totaling $6,000 in

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excess of limits.

7. 2 U.S.C. § 441a(a)(1)(C) limits individual contributions to political committees (other than candidate committees and party committees) to $5,000 per calendar. A review of contributions and check copies provided by the respondent revealed that during 1988, respondent made contributions to a political committee totaling $5,000 in excess of limits.

V. Respondent made contributions in excess of the annual contribution limits for 1988 and 1989 in violation of 2 U.S.C. § 441a(a)(3); in excess of limitations in violation of 2 U.S.C. § 441a(a)(1)(A); and in excess of limitations in violation of 2 U.S.C. § 441a(a)(1)(C).

VI. Respondent contends that the violations were not knowing and willful. Respondent will pay a civil penalty to the Federal Election Commission in the amount of nineteen thousand eight hundred dollars ($19,800), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VII. 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.

VIII. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

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IX. Respondent shall have no more than 30 days from the date this agreement becomes effective to comply with and implement the requirement contained in this agreement and to so notify the Commission.

X. 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

BY: _____ 1/31/92
Lois G. Lerner
Associate General Counsel
Date

FOR THE RESPONDENT:

Philip S Beck (attorney for Mr. Simons) 12/26/91
(Name)
(Position)
Date

93040934231

COPY

HERGE, SPARKS, CHRISTOPHER & BIONDI
ATTORNEYS AT LAW
SUITE 200
8201 GREENSBORO DRIVE
McLEAN, VIRGINIA 22102
(703) 848-4700

J. CURTIS HERGE
ROBERT R. SPARKS, JR.
A. MARK CHRISTOPHER
GEORGE V. BIONDI
MATTHEW SCOTT McCONNELL

TELECOPIER NUMBER
(703) 893-7371

February 6, 1992

HAND-DELIVERED

Commission Secretary
Federal Election Commission
999 E Street, N.W.
Washington, D. C. 20463

Re: MUR 3104; Donald J. Trump

Dear Madam Secretary:

In accordance with the provisions of 11 C.F.R. §111.16(c), we submit to you herewith ten (10) copies of a Brief which sets forth the position of the Respondent, Donald J. Trump, on the factual and legal issues involved in MUR 3104.

A copy of this letter and three (3) copies of Respondent's Brief are being filed simultaneously with the General Counsel.

Very truly yours,

J. Curtis Herge
Counsel to Donald J. Trump

:slc

Enclosures

cc: General Counsel
Federal Election Commission
(with 3 copies of Brief)

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RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
92 FEB -6 PM 4:15

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of DONALD J. TRUMP, Respondent.	MUR 3104

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
92 FEB -6 PM 4:16

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BRIEF OF RESPONDENT

I. Statement of the Case.

On August 3, 1990, the Federal Election Commission (hereinafter "the Commission") found reason to believe that Respondent, Donald J. Trump, may have violated the provisions of 2 U.S.C. §441a(a)(3) by reason of the fact that aggregate contributions made by him in 1985, 1987, 1988 and 1989 exceeded the $25,000 limitation applicable to calendar year 1988. In response to that finding, Mr. Trump provided evidence to the General Counsel of the Commission (1) that, in 1988, he first heard of the possible existence of an aggregate, as opposed to a per candidate or per committee, limitation; (2) that he promptly solicited the advice of counsel on the nature of such a limitation; (3) that his counsel advised him in writing that no individual may make Federal contributions aggregating in excess of $25,000 in "any calendar year"; (4) that counsel neglected or failed to advise him that "any calendar year" also means that any contribution made to a candidate in a year other than the calendar year in which the election is held is considered to be

made during the calendar year in which such election is held; (5) that, as a consequence of and in reliance upon the advice of counsel, he promptly took corrective action, soliciting and collecting refunds of contributions made in "calendar year" 1988 in order to reduce the aggregate contributions made by him in "calendar year" 1988 to less than $25,000.

Notwithstanding the foregoing facts and circumstances, and the parallel between those facts and circumstances and those found in MUR'S 1526, 1893 and 2167, where no further action was taken by the Commission, the General Counsel is now recommending that the Commission find probable cause to believe that Respondent violated 2 U.S.C. §441a(a)(3). It is the position of Respondent that to impose a fine or take any further action in this matter would be unreasonable and serve no useful purpose; and, in fact, would be violative of his right of equal protection. First, the mitigating factors present in this MUR have proven to be decisive in Commission actions involving other individuals. Second, while inaccurate legal advise does not necessarily vitiate all violations of law, the Commission should appreciate the difficulty that all but the most experienced practitioners have in deciphering and understanding that "in any calendar year" does not at all mean what it appears to mean. Third, a fine in this matter may have a chilling effect upon individuals and reduce their incentive to correct errors they discover promptly and in good faith. Civil justice is disserved by ignoring equity, precedents and the good faith of those who,

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in reliance upon legal counsel, have every reason to believe they have complied with the law and have caused no demonstrable wrong.

The attention of the Commission is also called to a disturbing element in this case which, if true, is violative of Respondent's right to due process and equal protection under the law. The initial action in this matter was taken by the Commission on August 3, 1990. Respondent's full and complete submission in response to the Commission's action was made on September 20, 1990. Query: Why was no further action taken on this matter for fifteen months, an extraordinarily long period of time as compared to the standard time it takes the Office of General Counsel to process compliance proceedings? Could it be that this matter was intentionally pigeon-holed until it could be resurrected in a Presidential election year, the intent being that a fine imposed on an individual with a nationally recognized name would result in wide-spread publicity about the true meaning of the $25,000 aggregate contribution limitation? If so, Respondent's rights have been clearly violated. The Commission has and should use less malevolent ways of educating the general public about the provisions of 2 U.S.C. §441a(a)(3).

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II. Facts.

Annexed to this brief, as Exhibit A, is a copy of the Affidavit, dated September 19, 1990, which Respondent submitted to the Office of General Counsel in this matter. In his Affidavit, Respondent disclosed that he first heard of the

possible existence of a $25,000 aggregate contribution limit in early December, 1988, in the course of an interview with a newspaper reporter. Respondent immediately contacted his attorney, Lawrence A. Mandelker, Esq., of Berger & Steingut, 600 Madison Avenue, New York, New York, and asked him for advice on the law applicable to limitations on contributions to Federal candidates and committees. Mr. Mandelker advised Respondent verbally that the law provides "no individual may make Federal contributions aggregating more than $25,000 in any calendar year." At Respondent's request, Mr. Mandelker confirmed his advice in writing. A copy of Mr. Mandelker's memorandum, addressed to Anthony Gliedman, then Executive Vice President of the Trump Organization, dated December 29, 1988, is attached to Respondent's Affidavit at Exhibit A to this brief. Attention is called to the second paragraph on page 3 of Mr. Mandelker's memorandum, which states:

> "No individual may make federal contributions aggregating more than $25,000 in any calendar year. Contributions covered by this limitation are those to: a candidate for federal office, a federal multi-candidate committee, a committee making independent expenditures*, a National Party Committee and to 'Delegates'**" (Footnotes omitted; see footnotes in original).

Mr. Mandelker's verbal and written advice was without qualification, to wit: the $25,000 aggregate limitation related to contributions made in a <u>calendar</u> year.

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Acting in reliance upon his attorney's advice, Respondent immediately instructed his bookkeeper and staff to audit all Federal contributions made by Respondent in calendar year 1988; and, to take immediate steps to obtain refunds, if necessary, to bring the aggregate total to no more than $25,000. The result of the staff audit was Respondent had made contributions, to that point in 1988, aggregating $44,330 to Federal candidates and committees. See, page 3 of Respondent's Affidavit at Exhibit A. Refunds were solicited and a total of $25,000 in contribution refunds were received by Respondent before December 31, 1988. An additional $1,000 was reattributed, at the request of a candidate's committee, to the 1990 primary election. See, page 4 of Respondent's Affidavit at Exhibit A. As a consequence of these actions, all taken in December, 1988, Respondent closed the year in the belief that the aggregate of the Federal contributions made by him in calendar year 1988 had been reduced to $18,330.

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III. Discussion.

The Respondent's voluntary efforts to resolve this matter should be considered by the Commission in determining whether to take further action on this matter. In previous instances where it has reviewed violations of the Act, the Commission has treated respondents' voluntary efforts to comply with the law and its regulations as a good faith act which did not warrant or justify further action. Specifically, in MUR 375,

a Commission staff memorandum stated that voluntary compliance, as opposed to waiting for Commission action, should be viewed as a mitigating factor. It is clear that that principle was persuasive in three compliance matters that involved violations of §441a(a)(3) and facts parallel to those under review.

Specifically, in MUR 1526, MUR 1893 and MUR 2167, the Commission voted to take no action against respondents who had exceeded the limitation in §441a(a)(3). All three cases involved situations where the individual discovered the violation on his own, acted promptly to nullify the effect and obtained refunds before compliance proceedings were instituted. In each case, the General Counsel recommended that the Commission not pursue the matter because of these mitigating factors and the Commission concurred. Thus, in factual situations practically identical to those present in this case, the Commission voted to take no further action against respondents who immediately sought and obtained funds of excess contributions before formal proceedings were instituted. The Commission has looked differently upon violations of §441a(a)(3) where such mitigating factors were not present. See, for example, MURs 892, 1098, 1101 and 1904. Thus, the existence of voluntary and expeditious action, before a compliance file has been opened, has led uniformly to decisions to take no further action.

The fact that Mr. Trump's counsel was not accurate in his advice on the law does not warrant further action against Mr. Trump. The provision in §441a(a)(3) that "no individual shall

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make contributions aggregating more than $25,000 in any calendar year" is, while not generally known to the public, clear and concise. However, the subsequent sentence in §441a(a)(3), which provides that "any calendar year" does not mean any calendar year when it comes to contributions to candidates, is obscure, baffling and not easily understood by other than the most experienced practitioners. Mr. Trump asked for and was given advice by his attorney. Whether through inadvertence or misunderstanding, his attorney did not advise Mr. Trump of the existence or meaning of the second sentence in §441a(a)(3). Neither Mr. Trump, nor any other individual, should be charged with the responsibility of asking a second lawyer for advice on the same issue. Our system does not impose such an obligation and, thus, recognizes that an individual is justified in a matter of this nature when he acts in good faith upon the advice of counsel.

The General Counsel argues that the second sentence in §441a(a)(3) "unambiguously states that any contribution made to a federal candidate in a non-election year will be considered to be made during the calendar year in which such election is held." (Emphasis added.) See, General Counsel's Brief at page 2. In fact, the statute does not, as the General Counsel asserts, set forth the law in such a concise and unambiguous way. The statute flatly states that "no individual shall make contributions aggregating more than $25,000 in any calendar year." That, we concede, is unambiguous. However, the statute then goes on, in

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one of the most classic examples of literary obfuscation, to state: "any contribution made to a candidate in a year other than the calendar year in which the election is held with respect to which such contribution is made, is considered to be made during the calendar year in which such election is held." That is unambiguous? The phrase, "in a non-election year," is so much better than "in a year other than the calendar year in which the election is held with respect to which such contribution is made." Perhaps the uninitiated could better understand the law if, in fact, the clause were written as the General Counsel has paraphrased it in his Brief.

The General Counsel also argues that the refunds secured by Respondent "were not timely pursuant to 11 C.F.R. §103.3(b)." See, General Counsel's Brief at page 2. In response thereto, it should be noted that 11 C.F.R. §103.3(b) imposes burdens and responsibilities on the treasurer of a committee, not on a contributor. Thus, because no time constraints or limitations are imposed on a contributor in 11 C.F.R. §103.3(b), the General Counsel's point is not relevant to this matter. Further, it should be noted that the respondents in MURs 1526, 1893 and 2167 were each rewarded for having acted "promptly" after the error was discovered, whenever that discovery was made. In this matter, Respondent discovered the error, took corrective action and secured refunds all within a matter of weeks. The respondents in the cited compliance proceedings were not brought

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to task by 11 C.F.R. §103.3(b); Respondent should be treated no differently.

IV. Conclusion.

We would like to stress the fact that Mr. Trump acted voluntarily and expeditiously to correct an unintentional and unwitting violation; a violation which he came to learn from counsel involved a limitation on the aggregate amount an individual may contribute in any calendar year. In addition to seeking professional advice on the law, he immediately instructed his staff to conduct a review of the contributions he had made in 1988 and he promptly recovered refunds in an amount sufficient to bring him into compliance with the law as instructed by counsel. By any standard, these are exemplary actions. Because these facts and mitigating circumstances parallel those in MURs 1526, 1893 and 2167, no futher action should be taken in this matter and the file should be closed.

Respectfully submitted,

(Sgd) J. Curtis Herge

J. Curtis Herge, Esq.
Herge, Sparks, Christopher & Biondi
Suite 200
8201 Greensboro Drive
McLean, Virginia 22102
(703) 848-4700

Counsel for Respondent,
Donald J. Trump

Dated: February 6, 1992

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Exhibit A

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of DONALD J. TRUMP, Respondent.	)	MUR 3104

RECEIVED
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OFFICE OF GENERAL COUNSEL
92 FEB -6 PM 4:16

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AFFIDAVIT OF DONALD J. TRUMP

STATE OF NEW YORK)
) ss:
COUNTY OF NEW YORK)

DONALD J. TRUMP, being duly sworn, deposes and says:

1. That I am the Donald J. Trump named as the Respondent in the matter pending before the Federal Election Commission numbered MUR 3104.

2. That I submit this Affidavit to the Federal Election Commission voluntarily, and of my own free will, in an effort to set forth the relevant facts and to explain my intention and efforts to comply, and be in compliance with, the provisions of the Federal Election Campaign Act.

3. That, in December 1988, a newspaper reporter called my attention to the fact that Federal law apparently imposes an aggregate limit of $25,000.00 on the total amount an individual may contribute to Federal candidates and committees in any calendar year. Although I had had a general awareness that Federal law imposed limitations on the amounts an individual could contribute to a particular candidate or to a

Herge, Sparks, Christopher & Biondi
Attorneys at Law
8201 Greensboro Drive
McLean, Virginia 22102
(703) 848-4700

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particular type of committee, I was previously unaware of the existence of an aggregate calendar year limitation.

4. Upon learning of the possible existence of some type of aggregate limitation, I immediately instructed my attorney, Lawrence A. Mandelker, Esq., a member of the law firm of Berger & Steingut, 600 Madison Avenue, New York, New York, 10022, to advise me on the law applicable to limitations on contributions to Federal candidates and committees.

5. At a time in early December, 1988, Lawrence A. Mandelker, Esq., advised me verbally that the law provides "no individual may make Federal contributions aggregating more than $25,000.00 in any calendar year." Mr. Mandelker later confirmed his advice in a memorandum addressed to Anthony Gliedman, Executive Vice President of the Trump Organization, dated December 29, 1988, a copy of which is attached hereto as Exhibit A. Attention is called to the second paragraph on page 3 of the subject memorandum, which states:

> "No individual may make federal contributions aggregating more than $25,000 in any calendar year. Contributions covered by this limitation are those to: a candidate for federal office, a federal multi-candidate committee, a committee making independent expenditures*, a National Party Committee and to 'Delegates'**" (Footnotes omitted; see footnotes in original).

Mr. Mandelker's verbal and written advice was without qualification, to wit: the $25,000.00 aggregate limitation related to contributions made in a <u>calendar</u> year.

6. Upon being advised by Lawrence A. Mandelker, Esq. that no individual may make Federal contributions aggregating more than $25,000.00 in a calendar year, I immediately instructed my bookkeeper and staff to audit all political contributions made by me in 1988 and to take such steps as may be indicated to bring me into compliance with the law.

7. Attached hereto as Exhibit B are copies of the ledger sheets and workpapers prepared by my bookkeeper and staff regarding contributions made by me in 1988. The starting point in their analysis was the Federal Election Commission computer generated list of individual contributions, which had been given to me by the newspaper reporter referred to in paragraph 3 hereof. Extracted from the list were all contributions made by me and reported as having been received in 1988. The aggregate total extracted from that list was $37,080.00. (See, line 1 on page 1 of Exhibit B.) Next, there were listed all contributions made by me in the period July 1, 1988 through early December, 1988, none of such contributions having been reported on the Federal Election Commission computer generated list. The aggregate total of the contributions made by me to Federal candidates and committees during that period was $7,250.00. (See, line 2 on page 1 of Exhibit B.) The conclusion of their research was that, by that point in December, 1988, I had made contributions aggregating $44,330.00 to Federal candidates and committees. (See, line 3 on page 1 of Exhibit B.)

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8. As a result of the finding that I had apparently made $44,330.00 in contributions to Federal candidates and committees between January 1, 1988 and early December, 1988, I immediately directed that corrective action be taken.

Attached hereto as Exhibit C is a copy of a letter to the Chairman of the Democratic Congressional Campaign Committee, dated December 12, 1988, requesting the refund of a $15,000.00 contribution made by me in March, 1988; and, a copy of the refund check dated December 30, 1988.

Attached hereto as Exhibit D is a copy of a letter to the Finance Chairman of the Republican National Committee, dated December 12, 1988, requesting the refund of a $10,000.00 contribution made by me in January, 1988; and, a copy of the refund check dated December 21, 1988.

In addition to the foregoing, Citizens for Joseph Kennedy, for their own reasons, asked in 1988 if the $1,000.00 contribution made by me in December, 1988, could be set aside and used in the 1990 primary election. I concurred.

The consequence of these actions was to reduce the aggregate of the contributions made by me in calendar year 1988 to $18,330.00. (See, last line on page 1 of Exhibit B.)

9. I did not know, until early December, 1988, that Federal law imposed an aggregate limitation on the amount an individual may contribute to Federal candidates and committees. When counsel advised me that the law states that no individual

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may make Federal contributions aggregating more than $25,000.00 in any calendar year, I immediately instructed that my contribution history in 1988 be analyzed and, when excess was discovered, sought and obtained refunds. As a result of the foregoing voluntary actions, I believed in good faith that I was in full compliance with the law.

IN WITNESS WHEREOF, I have executed this Affidavit this 19th day of September, 1990.

DONALD J. TRUMP

Sworn to before me, a notary public, this 19th day of September, 1990.

Notary Public

My Commission Expires:_____.

NORMA I FOERDERER
Notary Public, State of New York
No. 31-4743494
Qualified in New York County
Commission Expires Sept. 30, 19-1 |

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BERGER & STEINGUT

MEMORANDUM

TO: Anthony Gliedman,
Trump Organization

DATE: December 29, 1988

FROM: Lawrence A. Mandelker

RE: Federal, City and State Contribution Limits

You have asked me to submit a memorandum setting forth to applicable rules (and potential pitfalls) applicable to campaign contributions to Federal, New York State and New York City candidates.

A) Federal

1. Candidates and their authorized committees.

An individual may give $1,000 per election to a candidate for federal office or his authorized committee. A primary convention or caucus on the one hand and a general election of the other hand are considered two separate elections. Unless earmarked for the particular primary/convention/caucus or general election, a contribution received on or before the date of the primary/convention/caucus will be deemed to be a contribution to that election. A contribution received after that date will be deemed to be a contribution to the general election.

If there is no primary/caucus or convention, or if the candidate runs unopposed in a primary, caucus or general election, a separate election is deemed to be held on the date on which the primary, caucus or convention would have been held.

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Each spouse (even in a single income family) has his or own separate contribution limit. Minor children (under 18) have their own limits provided:

- the child's decision to contribute is knowing and voluntary.
- the child owns or exclusively controls that which is given
- the contribution is not made from the proceeds of a gift given to the child for such purpose

2. **Political committees established and maintained by a National Political Party ("National Political Committees")**

National Political Committees include: (a) the National Committee, the House campaign committee and the Senate campaign committee. Although each of these committees may receive up to $20,000 from a contributor in any calendar year, an individual may not give more than $20,000 in the aggregate to the National Political Committees of each party in any calendar year.*

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*This limitation does not apply when the contributor is a PAC. The PAC can give $20,000 to each of a party's National Political Committees

No individual may make contributions to any other federal political committee (e.g. a PAC) which aggregates more than $5,000 in any calendar year.

No individual may make federal contributions aggregating more than $25,000 in any calendar year. Contributions covered by this limitation are those to: a candidate for federal office, a federal multi-candidate committee, a committee making independent expenditures*, a National Party Committee and to "Delegates"**

Contributions from the treasuries of a corporation, labor union or a national bank are prohibited. Additionally, national banks and federally chartered corporations may not make a contribution in connnection with a state or local election.

However corporations, labor unions, or national banks may form separate segregated funds (popularly called PACs) which can make contributions.

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* An expenditure for a communication expressly advocating the election or defeat of a clearly identified candidate which is made totally independently of a candidate's campaign.

** Although contributions to persons seeking appointment or election as a delegate to a national convention or to a State,district or local convention or caucus which slects delegates to the national convention are neither subject to the limits of federal law nor even reportable thereunder, such contributions are included within the calendar year aggregate limitation of $25,000.

Contributions from federal government contractors are prohibited. The prohibition applies to both personal and business funds of individual or sole proprietorship contractors. It does not apply to personal contributions by employeees, partners, shareholders or officers of businesses with government contracts, nor to their separate segregated funds.

B) State of New York

No person may contribute to a candidate or to his authorized committee more, in connection with a primary more than the aggregate of the product of five cents multiplied by the number of enrolled voters in the candidates's party in the district in which he is a candidate. For the general election, the formula is changed to the product of five cents multiplied by the number of all registered voters in the district. Notwithstanding the foregoing, the maximum contribution under the formula shall be not less than $1,000 per election and not more than $50,000 per election.* The primary and general election are each separate elections.

If a nomination or election to State Senator is involved, the contributor may give the higher of the formula or $4,000. If a nomination for assemblyman is involved, the contributor may give the higher of the formula or $2,500.

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*Since application of the formula to either the Democratic primary or to the general election for Mayor of the City of New York would exceed the $50,000 maximum, aggregate contributions involving those races are limited to $50,000.

If the contribution is in connection with a State Wide office, the formula becomes the product of 1/2 cent multiplied by the number of voters enrolled in the candidate's party in the State, in the case of a primary; and by the number of registered voters in the State, in the case of a general election.

A loan to a candidate or his committee made other than in the lender's regular course of business, is deemed a contribution by the lender to the extent not repaid by the time of the primary, special or general election. If the loan was made in the lender's course of business, it is deemed a contribution by the obligor and by any other person endorsing, co-signing, guaranteeing, collateralizing or otherwise providing security.

No person may contribute, loan or guarantee an aggregate of $150,000 in connection with state or local elections held in New York State within a calendar year.

A corporation may contribute up to an aggregate $5,000 to state and local candidates within a calendar year. Each corporate affiliate, subsidiary or parent has its own $5,000 limit.

C) City of New York

If a candidate for city office opts into public financing, a contributor whether, individual or corporate, may not contribute more than $3,000 for City Wide office, $2,500 for Borough Wide office and $2,000 for councilman for the primary, (run-off in the case of City Wide office) and for the general election.

As applied to a corporation, the contribution limit for an election applies in the aggregate to a corporation and all of its affiliates, subsidiaries and parents.

No person, corporation or partnership which is an applicant or bidder in a matter before the Board of Estimates, and no person who owns more than 5% of the outstanding stock or who is an officer of such

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corporation, and no person who is a partner in such partnership may for a period:

a) commencing six months before and ending twelve months after official consideration by the Board*.

b) make a contribution or loan to an incumbent member or a candidate for such office (or their authorized committees) in excess of $3,000.00.

As I interpret the law, a corporate parent would fall under the law (owns more than 5% of the outstanding stock)** but an affiliate or subsidiary would not.

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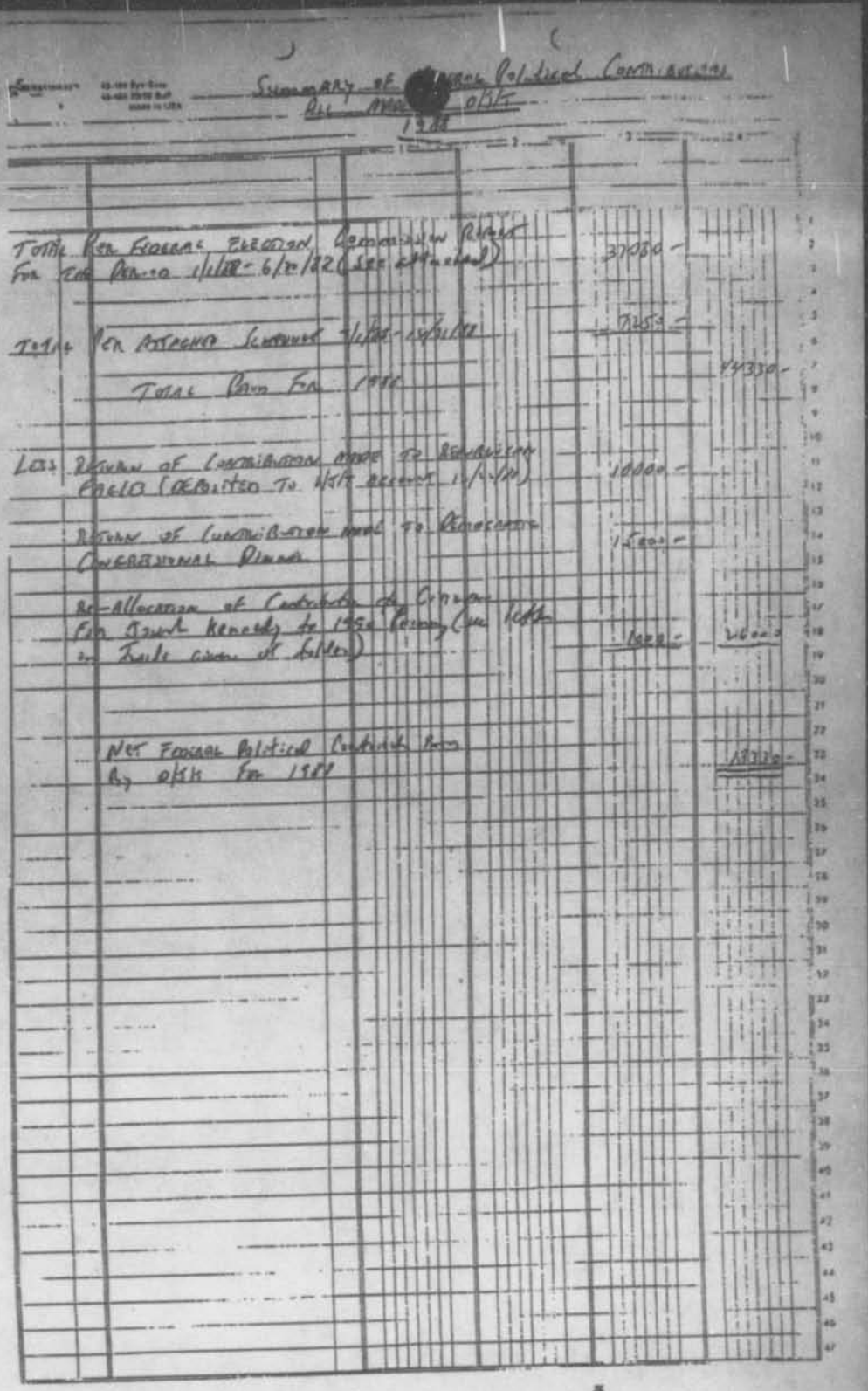
*Unclear what official consideration is. I would use the vote. Others use time of first calendaring until vote

**the law says 5% of the outstanding stock and not 5% of the issued and outstanding stock.



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Political Contributions Paid By D/S 1T

DATE	CK #	PAYEE			AMOUNT	FOR LOCAL
2/19/88	4055	FRIENDS OF SENATOR D AMATO			400	400
2/11	4023	DOUGLAS FOR CONGRESS			1000	1000
2/13	4022	FRIENDS FOR BRYAN			1000	1000
2/8	4324	COMMITTEE FOR GOODMAN			2000	
2/8	4325	HOUSE LEADERSHIP COUNCIL			1000	
9/6	4997	YORKTOWN VOLUNTEER COMMITTEE		*	1000	
9/19	4666	CITY COUNCIL POLITICAL ACTION COMM		*	1000	
	4667	DEMOCRATIC SENATE CAMPAIGN COMM		*	250	
9/28	4695	MORGENTHAU 89			5000	
12/26	4687	FLORICO 88 COMMITTEE		*	1000	1000
10/1	1034	COMM RE-ELECT CLAUDINE SCHNEIDER		*	500	500
10/1	1119	TOM LIBOUS FOR STAT			1000	
10/24	1161	TCO. WOMEN FOR CONGRESS			250	250
10/24	1147	DEMOCRATIC SENATE CAMPAIGN COMM		*	300	
10/24	1230	COMM FOR A GOLD			2500	
10/25	4749	JIM QUIGLEY CAMPAIGN FUND			1000	
	4750	ROBERT WEXLER CAMPAIGN FUND			1000	
11/1	1334	DANIELS FOR U.S. SENATE			1000	1000
11/1	1333	SENATE DEMOCRATIC COMPAIGN			5000	
11/4	1936	HARRY JOHNSTON FOR CONGRESS			500	500
11/14 (*)	1486	KEN ADAMS FOR CONGRESS			500	500 (*)
11/1	1577	FRIENDS OF SENATOR D'AMATO		X	1000	1000
11/1	1571	CITIZENS FOR JOE KOLTON		X	1000	1000
						7750
(*)	CHECK VOIDED IN 12/22					(500)
						7250

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FEDER ELECTION COMMISSION

SELECTED LIST OF RECEIPTS & EXPENDITURES (G) (87-88)
SE ION I -- INDIVIDUAL CONTRIBUTIONS

CONTRIBUTOR/LENDER/TRANSFERRER REPORTING ENTITY MICROFILM LOCATION TRANSACTION TYPE	STREET ADDRESS	CITY	STATE ZIP REPORT TYPE DATE	TYPE OF FILER ELECTION	AMOUNT
TRUMP, DONALD J COMMITTEE TO RE ELECT UNITED STATES SENATOR PAUL A HAM 87SEN/006/1200 #134827 CONTRIBUTION	NS	NEW YORK	NY 10022 MID-YEAR REPORT 20FEB87	FOR 1988	1,000
TRUMP, DONALD J CONGRESSMAN FLOYD H FLAKE CAMPAIGN COMMITTEE 88HSE/342/4618 #253567 CONTRIBUTION		NEW YORK TRUMP ORGANIZATION	NY 10022 YEAR-END 2NOV87	PRIMARY	500
TRUMP, DONALD J CONGRESSMAN FLOYD H FLAKE CAMPAIGN COMMITTEE 88HSE/342/4618 #253568 CONTRIBUTION		NEW YORK TRUMP ORGANIZATION	NY 10022 YEAR-END 16NOV87	PRIMARY	500
TRUMP, DONALD J CRANSTON FOR PRESIDENT COMMITTEE INC 88FEC/332/4497 #001005 CONTRIBUTION		NEW YORK	NY 10022 APRIL QUARTERLY 23JAN88	PRIMARY	1,000
TRUMP, DONALD J DANFORTH FOR SENATE 87SEN/006/4069 #149372 CONTRIBUTION		NEW YORK TRUMP ORGANIZATION	NY 10022 MID-YEAR REPORT 18JUN87	PRIMARY	1,000
TRUMP, DONALD J DANFORTH FOR SENATE 88SEN/005/3723 #242321 CONTRIBUTION		NEW YORK TRUMP ORGANIZATION	NY 10022 YEAR-END 25NOV87	GENERAL	1,000
TRUMP, DONALD J DEMOCRATIC CONGRESSIONAL CAMPAIGN COMMITTEE INC 88HSE/349/2811 #329635 CONTRIBUTION		NEW YORK TRUMP ORGANIZATION	NY 10022 APRIL MONTHLY 24MAR88	PRIMARY	15,000
TRUMP, DONALD J EMPIRE LEADERSHIP FUND 88FEC/500/2146 #169195 CONTRIBUTION		NEW YORK THE TRUMP ORGANIZATION	NY 10022 YEAR-END 17SEP87	PRIMARY	2,500
TRUMP, DONALD J FRIENDS OF CONNIE MACK 88SEN/011/2194 #456968 CONTRIBUTION		PALM BEACH DEVELOPER	FL 33480 JULY QUARTERLY 24JUN88	PRIMARY	1,000
TRUMP, DONALD J FRIENDS OF LARRY PRESSLER COMMITTEE 87SEN/009/1610 #146851 CONTRIBUTION		NEW YORK THE TRUMP ORGANIZATION	NY 10022 MID-YEAR REPORT 12MAY87	GENERAL	1,000
TRUMP, DONALD J FRIENDS OF SENATOR DAVID KARNES 88SEN/007/3194 #325041 CONTRIBUTION		NEW YORK ENTREPRENEUR	NY 10022 APRIL QUARTERLY 30MAR88	PRIMARY	1,000
TRUMP, DONALD J MATCH ELECTION COMMITTEE 88SEN/007/3669 #342569 CONTRIBUTION		NEW YORK THE TRUMP ORGANIZA	NY 10022 APRIL QUARTERLY 2MAR88	PRIMARY	1,000

FEDERAL ELECTION COMMISSION — DATE 18SEP88 — PAGE 4269

SELECTED LISTING — RECEIPTS & EXPENDITURES (G) (87-88) — SECTION I - INDIVIDUAL CONTRIBUTIONS

CONTRIBUTOR/LENDER/TRANSFERER / REPORTING ENTITY / MICROFILM LOCATION / TRANSACTION TYPE	STREET ADDRESS	CITY	STATE ZIP / REPORT TYPE	TYPE OF FILER / DATE	ELECTION	AMOUNT
TRUMP, BLAINE MR GEORGE BUSH FOR PRESIDENT INC COMPLIANCE 88FEC/527/2634 #345410 CONTRIBUTION		NEW YORK CITY	NY 10151 MAY MONTHLY	15APR88	GENERAL	1,000
TRUMP, BLAINE MRS GEORGE BUSH FOR PRESIDENT, INC 88FEC/505/1829 #183907 CONTRIBUTION		NEW YORK CHRISTIE MANSON & WOODS	NY 10021 YEAR-END	21OCT87	PRIMARY	500
TRUMP, DONALD BURDICK CAMPAIGN COMMITTEE 88SEN/005/2295 #240862 CONTRIBUTION		NEW YORK THE TRUMP COMPANY	NY 10022 YEAR-END	2NOV87	PRIMARY	500
TRUMP, DONALD MOYNIHAN COMMITTEE INC 88SEN/007/3059 #336126 CONTRIBUTION		NEW YORK TRUMP CONSTRUCTION C	NY 10022 APRIL QUARTERLY	22MAR88	GENERAL	1,000
TRUMP, DONALD TED WEISS FOR CONGRESS COMMITTEE 88HSE/342/4415 #278659 CONTRIBUTION		NEW YORK SELF-EMPLOYED	NY 10022 YEAR-END	15SEP87	PRIMARY	1,000
TRUMP, DONALD WALLOP SENATE DRIVE, INC 88SEN/004/3709 #237716 CONTRIBUTION		NY TRUMP ORGANIZATION	NY 10022 YEAR-END	19OCT87	PRIMARY	1,000
TRUMP, DONALD J BABBITT FOR PRESIDENT COMMITTEE 88FEC/505/5369 #190018 CONTRIBUTION		NEW YORK TRUMP ORGANIZATION	NY 10022 YEAR-END	5OCT87	PRIMARY	1,000
TRUMP, DONALD J BROOKLYN DEMOCRATS - FEDERAL CAMPAIGN ACCOUNT 88FEC/536/1595 #423524 CONTRIBUTION		NEW YORK TRUMP ORGANIZATION	NY 00000 JULY QUARTERLY	8APR88	PRIMARY	500
TRUMP, DONALD J CITIZENS FOR ARLEN SPECTER 88SEN/003/2323 #226448 CONTRIBUTION		NEW YORK TRUMP ORGANIZATION	NY 10022 YEAR-END	10OCT87	PRIMARY	1,000
TRUMP, DONALD J CITIZENS FOR JOE KENNEDY-88 87HSC/336/2762 #152477 CONTRIBUTION		NEW YORK REAL ESTATE DEVLPR	NY 10022 MID-YEAR REPORT	24FEB87	GENERAL	1,000
TRUMP, DONALD J CITIZENS FOR JOHNSEND 87HSE/336/3770 #158188 CONTRIBUTION		NEW YORK TRUMP ORGANIZATION	NY 10022 MID-YEAR REPORT	24FEB87	GENERAL	500
TRUMP, DONALD J COMMITTEE FOR CONGRESSMAN BILL GREEN 87HSE/335/4693 #151298 CONTRIBUTION		NEW YORK CITY THE TRUMP ORGANIZATION	NY 10022 MID-YEAR REPORT	30JUN87	PRIMARY	1,000

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SELECTED LIST - F RECEIPTS & EXPENDITURES (G) (87-88)
SECTION 3 - INDIVIDUAL CONTRIBUTIONS

CONTRIBUTOR/LENDER/TRANSFERRER REPORTING ENTITY MICROFILM LOCATION TRANSACTION TYPE	STREET ADDRESS	CITY	STATE ZIP REPORT TYPE DATE	TYPE OF FILER ELECTION	AMOUNT
TRUMP, DONALD J HECHT REELECTION COMMITTEE 88SEN/C01/3624 #250752 CONTRIBUTION		NEW YORK	NY 10022 YEAR-END 25AUG87	PRIMARY	1,000
TRUMP, DONALD J JACK KEMP FOR PRESIDENT 87FEC/488/3423 #105450 CONTRIBUTION		PALM BEACH	FL 33480 OCTOBER QUARTERLY 15SEP87	PRIMARY	1,000
TRUMP, DONALD J MECARTHY FOR U S SENATOR 88SEN/C11/1961 #427492 CONTRIBUTION		NEW YORK THE TRUMP ORGANIZATION	NY 10022 JULY QUARTERLY 24MAY88	PRIMARY	1,000
TRUMP, DONALD J NEW YORK REPUBLICAN COUNTY COMMITTEE 87FEC/481/4143 #093082 CONTRIBUTION		NEW YORK TRUMP CORP	NY 10022 MID-YEAR REPORT 10MAR87	PRIMARY	5,000
TRUMP, DONALD J NEW YORK STATE DEMOCRATIC COMMITTEE-FEDERAL ACCOUN 87FEC/481/0860 #133299 CONTRIBUTION		NEW YORK TRUMP ORGANIZATION	NY 10022 MID-YEAR REPORT 15MAY87	PRIMARY	1,000
TRUMP, DONALD J NEW YORK STATE DEMOCRATIC COMMITTEE-FEDERAL ACCOUN 87FEC/481/086D #133300 CONTRIBUTION		NEW YORK TRUMP ORGANIZATION	NY 10022 MID-YEAR REPORT 15MAY87	PRIMARY	1,000
TRUMP, DONALD J PEOPLE FOR DIOGUARDI 88HSE/356/4800 #455912 CONTRIBUTION		NEW YORK TRUMP CORPORATION	NY 10021 JULY QUARTERLY 31MAY88.	PRIMARY	1,000
TRUMP, DONALD J PEOPLE FOR JOHN HEINZ COMMITTEE 88SEN/C11/2555 #438453 CONTRIBUTION		NEW YORK THE TRUMP ORGANIZATION	NY 10022 JULY QUARTERLY 26MAY88	GENERAL	1,000
TRUMP, DONALD J RANGEL FOR CONGRESS COMMITTEE 87HSE/337/2250 #153715 CONTRIBUTION		NEW YORK THE TRUMP ORGANIZATION	NY 10022 MID-YEAR REPORT 11JUN87	PRIMARY	1,000
TRUMP, DONALD J RANGEL FOR CONGRESS COMMITTEE 88HSE/347/2342 #275630 CONTRIBUTION		NEW YORK TRUMP ORGANIZATION	NY 10022 YEAR-END 13NOV87	GENERAL	1,000
TRUMP, DONALD J MR ALBERT GORE JR FOR PRESIDENT COMMITTEE INC 87FEC/487/0503 #092457 CONTRIBUTION		NEW YORK	NY 10022 OCTOBER QUARTERLY 24AUG87	PRIMARY	1,000
TRUMP, DONALD J MR CALIFORNIANS FOR SENATOR PETE WILSON 88SEN/C05/0261 #334367 CONTRIBUTION		NEW YORK THE TRUMP ORGANIZATION	NY 10022 APRIL QUARTERLY 5FEB88	PRIMARY	1,000

Check Deposited By N.Y. Republican (Cnty, (Complete

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DATE RECEIVED

FEDERAL ELECTION COMMISSION

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SELECTED L OF RECEIPTS & EXPENDITURES (FD (87-88)
SECTION I - INDIVIDUAL CONTRIBUTIONS

CONTRIBUTOR/LENDER/TRANSFERRER REPORTING ENTITY MICROFILM LOCATION	STREET ADDRESS TRANSACTION TYPE	CITY	STATE ZIP REPORT TYPE DATE	TYPE OF FILER ELECTION	AMOUNT
TRUMP, DONALD J MR CITIZENS FOR JOE KENNEDY 1988 88HSE/341/2223 #273267	CONTRIBUTION	NEW YORK RE DEVL	NY 10022 YEAR-END 8DEC87	PRIMARY	1,000
TRUMP, DONALD J MR COURTER FOR CONGRESS COMMITTEE 88HSE/354/3824 #455743	CONTRIBUTION	NEW YORK DEVELOPER	NY 10022 JULY QUARTERLY 23JUN88	PRIMARY	1,000
TRUMP, DONALD J MR DOLE FOR PRESIDENT COMMITTEE INC 87FEC/488/0627 #124339	CONTRIBUTION	NEW YORK TRUMP ORGANIZATION	NY 10022 OCTOBER QUARTERLY 28AUG87	PRIMARY	1,000
TRUMP, DONALD J MR FRIENDS OF PHIL GRAMM 87SEN/007/1300 #140523	CONTRIBUTION	NEW YORK THE TRUMP ORGANIZATION	NY 10022 MID-YEAR REPORT 19MAY87	PRIMARY	1,000
TRUMP, DONALD J MR GEPHARDT FOR PRESIDENT COMMITTEE INC 88FEC/522/0152 #312924	CONTRIBUTION	JAMAICA	NY 11432 APRIL MONTHLY 6MAR88	PRIMARY	1,000
TRUMP, DONALD J MR PAUL SIMON FOR PRESIDENT 87FEC/488/2352 #111368	CONTRIBUTION	NEW YORK TRUMP ORGANIZATION	NY 10022 OCTOBER QUARTERLY 11AUG87	PRIMARY	1,000
TRUMP, DONALD J MR REPUBLICAN NATIONAL COMMITTEE - CONTRIBUTIONS !		A REPUBLICAN NATIONAL FINANCE COMMITTEE THE TRUMP ORGANIZATION	NY 10022 APRIL QUARTERLY 25JAN88	PRIMARY	10,000
88FEC/519/2075 #301258	CONTRIBUTION	NEW YORK THE TRUMP ORGANIZATION	NY 10022 YEAR-END 6AUG87	PRIMARY	1,000
TRUMP, DONALD J MR WEICKER '88 COMMITTEE 88SEN/001/0607 #251247	CONTRIBUTION	NEW YORK	NY 10022 APRIL QUARTERLY 16FEB88	GENERAL	1,000
TRUMP, DONALD J MR WEICKER '88 COMMITTEE 88SEN/008/0540 #334892	CONTRIBUTION	NEW YORK CITY DEVELOPER	NY 10151 MAY MONTHLY 15APR88	GENERAL	1,000
TRUMP, DONALD MR GEORGE BUSH FOR PRESIDENT INC COMPLIANCE 88FEC/527/2630 #345390	CONTRIBUTION	NEW YORK TRUMP ORGANIZATION	NY 10022 YEAR-END 6AUG87	PRIMARY	$30
TRUMP, DONALD MR RIEGLE FOR SENATE IN '88 COMMITTEE 88SEN/003/0280 #203541	CONTRIBUTION	NEW YORK THE TRUMP GROUP	NY 10022 MAY MONTHLY 6MAR88	PRIMARY	1,000
TRUMP, EDDIE DUKAKIS FOR PRESIDENT COMMITTEE, INC 88FEC/522/4702 #337761	CONTRIBUTION				

Refund of $10,000 Contrib due to merge - both

December 12, 1988

Beryl Anthony
Chairman
Democratic Congressional Campaign Committee
430 South Capital
2nd Floor
Washington, D.C. 20003

Dear Mr. Anthony:

In reviewing our books at year-end, we have discovered that campaign contributions in excess of the individual calendar year limitation were inadvertently made during 1988. Among the contributions was a $15,000 check made payable to the Democratic Congressional Campaign Committee on March 7, 1988. A copy of the check is enclosed.

Accordingly, we would appreciate it if the Democratic Congressional Campaign Committee would refund $15,000 by check payable to the contributor and sent to the undersigned.

Very truly yours,

Allen Weisselberg
Controller

AW/jc
Encl.

9304093426O

THE TRUMP ORGANIZATION
725 FIFTH AVENUE · NEW YORK, N. Y. 10022 212 · 832 · 2000 TELEX · 427715

DONALD J. TRUMP

3/7 19 88

PAY TO THE ORDER OF Democratic Congressional Dinner Committee $ 15,000.00

EXACTLY ***15000 AND 00 CTS DOLLARS

The Chase Manhattan Bank, N.A.
181 - 10 Jamaica Avenue
Jamaica, NY 11432

CHASE

⑈000150000⑈

⑆021000021⑆ 930400934261

9239

930409341262

DEMOCRATIC CONGRESSIONAL
CAMPAIGN COMMITTEE
GENERAL CHECKING ACCOUNT
430 SOUTH CAPITOL STREET
WASHINGTON, D.C. 20003

SOVRAN BANK
DC NATIONAL

MAIN OFFICE
1801 K STREET, NW
WASHINGTON, D.C. 20006

15-170
540

December 30 19 88

PAY Fifteen thousand and xx/100 DOLLARS $ 15,000.

TO THE ORDER OF
Donald Trump
721 5th Avenue
New York, NY 10022

⑈00009239⑈ ⑆054001204⑆ ⑈26807 8⑈

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.

DEMOCRATIC CONGRESSIONAL
CAMPAIGN COMMITTEE

DELUXE - FORM WVC-3 V-7

Contribution Refund
FFR 400I

December 12, 1988

Lawrence E. Bathgate, III
Finance Chairman
Republican National Committee
310 First Street, S.E.
Washington, D.C. 20036

Dear Mr. Bathgate:

In reviewing our books at year-end, we have discovered that campaign contributions in excess of the individual calendar year limitation were inadvertently made during 1988. Among the contributions was a $10,000 check made payable to the Republican National Committee on January 11, 1988. A copy of the check is enclosed.

Accordingly, we would appreciate it if the Republican National Committee would refund $10,000 by check payable to the contributor and sent to the undersigned.

Very truly yours,

Allen Weisselberg
Controller

AW/jc
Encl.
Certified Mail, r.r.r.
#P 581 900 776

THE TRUMP ORGANIZATION
725 FIFTH AVENUE · NEW YORK, N. Y. 10022 212 · 832 · 2000 TELEX · 427715

9304093422623

2340

DONALD J. TRUMP

1-21
210

1/11 19 88

PAY TO THE ORDER OF Republican Eagles $ 10,000.00

EXACTLY $10,000 AND 00 CTS DOLLARS

The Chase Manhattan Bank, N.A.
781 - 90 Jamaica Avenue
Jamaica, NY 11432

CHASE

⑆021521152⑆ 172206431⑈

⑈000010000⑈

THIS CHECK IS OFFERED FOR PAYMENT ON THE FOLLOWING ACCOUNTS

DATE		AMOUNT	
TOTAL OF INVOICES			
LESS ____ % DISCOUNT			
LESS			
TOTAL DEDUCTIONS			
AMOUNT OF CHECK			

⑈0 4 0 9 3 4 2 6 4

REPUBLICAN NATIONAL FINANCE COMMITTEE
310 FIRST STREET, SOUTHEAST WASHINGTON, D.C. 20003 202-863-8720

December 21, 1988

BY FEDERAL EXPRESS

Mr. Allen Weisselberg
Controller
The Trump Organization
725 Fifth Avenue
New York, New York 10022

Dear Mr. Weisselberg:

Per your letter of December 12, 1988, I've enclosed a refund check in the amount of $10,000 made payable to Mr. Donald Trump.

Please let me know if you have additional questions about this matter.

Sincerely,

Betsy Tyson

Elizabeth A. Tyson
Assistant Director/
Director, Team 100

cc: Lawrence E. Bathgate, II

PAID FOR BY THE REPUBLICAN NATIONAL COMMITTEE

9304093426 5

REPUBLICAN NATIONAL FINANCE COMMITTEE
310 FIRST STREET, SE.
WASHINGTON, D.C. 20003

2404

DECEMBER 21 19 88

52-408/560 475

PAY TO THE ORDER OF DONALD J. TRUMP $ 10,000.00

TEN THOUSAND AND 00/100 DOLLARS

Bank of Virginia
1753 South Jefferson Davis Highway
Arlington, Virginia 22202

FOR REFUND

⑈0000 2404⑈ ⑆056004089⑆ 651⑈ 722064 3⑈

2304093426866

100 Crescent Court
Suite 1700
Dallas, Texas 75201
(214) 871-8400

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

92 FEB 11 AM 11:44

February 10, 1992

VIA EXPRESS MAIL

Federal Election Commission
Washington, D. C. 20463

Attention: Ms. Noriega E. James

Re: MUR 3104
Caroline Rose Hunt

Dear Ms. James:

In accordance with your letter dated January 13, 1992, and the executed conciliation agreement, enclosed is Caroline Rose Hunt's check in the amount of $800.00.

Very truly yours,

C. Jedson Nau

C. Jedson Nau, Attorney

CJN/cac

Enclosure

9304093342267

MANATT, PHELPS, PHILLIPS & KANTOR
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
ATTORNEYS AT LAW

TELEPHONE (202) 463-4300
FAX (202) 463-4394
(202) 463-4395

1200 NEW HAMPSHIRE AVENUE, N.W.
SUITE 200
WASHINGTON, D.C. 20036-6889

LOS ANGELES
1355 WEST OLYMPIC BOULEVARD
LOS ANGELES, CALIFORNIA 90064-1514
(310) 312-4000

March 3, 1992

Lawrence M. Noble, Esq.
General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 3104

Dear Mr. Noble:

Enclosed is a signed conciliation agreement submitted on behalf of Ira Riklis in settlement of the above-referenced matter. Also enclosed is a check in the amount of $2,500.00 for payment of the civil penalty.

Sincerely,

Lyn Utrecht

Lyn Utrecht

Enclosures

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RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
92 MAR -3 PM 1:06

100% COTTON
RECYCLED FIBER

MUR 3304
OGC4341

SKADDEN, ARPS, SLATE, MEAGHER & FLOM
1440 NEW YORK AVENUE, N.W.
WASHINGTON, D.C. 20005-2107
(202) 371-7000

FAX (202) 393-5760
DIRECT DIAL
(202) 371-

BOSTON
BRUSSELS
CHICAGO
HONG KONG
LONDON
LOS ANGELES
NEW YORK
SAN FRANCISCO
SYDNEY
TOKYO
TORONTO
WILMINGTON

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM
92 MAR -9 PM 2:25

March 6, 1992

VIA FAX

Mr. Noriega James
Federal Election Commission
Office of the General Counsel
999 E Street, Northwest
Washington, D.C. 20463

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
92 MAR -9 PM 3:11

Dear Mr. James:

Enclosed is a letter from the Republican National Committee which explains that the use of project names in the solicitation of funds to The President's Trust caused confusion because the Republican Party uses similar names for federal and non-federal committees. Consequently, when Mr. Perelman contributed to The President's Trust, he believed that he was contributing to a non-federal account.

We again request, based on the arguments that we have made, past precedent, and the information provided herein, that the Commission take no further action in this matter.

Sincerely,

Kenneth A. Gross

Enclosure

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Republican
National
Committee

Benjamin L. Ginsberg
Chief Counsel

Michael A. Hess
Janice P. Lacy
Deputy Chief Counsels

March 6, 1992

Mr. Kenneth A. Gross, Esq.
Skadden, Arps, Slate, Meagher & Flom
1440 New York Avenue, Northwest
Washington, DC 20005-2107

Dear Mr. Gross:

We understand that in 1988, Ronald O. Perelman made a $5,000 contribution to The President's Trust; an account established by the Republican National Committee ("RNC") that accepted proceeds for a Republican Party function held in New York City. We understand that Mr. Perelman was advised by someone unconnected with the Republican National Committee, or any other Republican entity, that The President's Trust was a non-federal political committee. Although Mr. Perelman intended the contribution to be deposited into a non-federal account, the RNC deposited Mr. Perelman's contribution into its federal account because The President's Trust was actually a federal account.

You have also informed us that at approximately the same time as the RNC solicited funds for The President's Trust, the National Republican Senatorial Committee and the National Republican Congressional Committee, committees unaffiliated with the RNC, solicited Mr. Perelman for an event called The President's Dinner, which accepted funds for a non-federal account.

The Republican Party encompasses three national party committees with the similarity of "Republican" in the committee names. These committees occasionally conduct fundraising programs for federal and non-federal accounts with the head of the party, the President, and so use his title in their fundraising projects. Although the RNC solicitations for contributions contain the disclaimers required under the law, a contributor unfamiliar with the intricacies of party committees and fundraising projects could confuse these committees and accounts. It is also possible that there could have

Dwight D. Eisenhower Republican Center • 310 First Street Southeast • Washington, D.C. 20003 • (202) 863-8636
Telex: 701144 • FAX: (202) 863-8820

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been some confusion over Mr. Perelman's contribution because The President's Trust fundraiser was a state event held in New York.

According to counsel, Mr. Perelman's lack of familiarity with project names sponsored by the various Republican committees resulted in Mr. Perelman making a contribution to a federal account when he intended to make a contribution to a non-federal account. While we regret that the similarity of the project names was the apparent basis for this misunderstanding, the simple fact remains that misunderstandings of this type still occasionally arise.

Please let us know if you need additional information.

Sincerely,

Benjamin L. Ginsberg

93040934271

WUNDER, DIEFENDERFER, RYAN, CANNON & THELEN
1615 L STREET, N.W., SUITE 850
WASHINGTON, D. C. 20036

(202) 659-3005

KENNETH S. LEVINE

March 6, 1992

Noriega James, Esq
General Counsel's Office
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: Mur 3104
Henry Kravis

Attn: Noriega James

Dear Mr. James:

Please accept this letter as a formal request to enter into pre-probable cause conciliation regarding all matters involving Henry Kravis in the above referenced MUR.

Should you have any questions regarding this matter, please contact me at your convenience.

Very truly yours,

Kenneth S. Levine

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OGC 4349

PERKINS COIE

A LAW PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
607 FOURTEENTH STREET, N.W. • WASHINGTON, D.C. 20005-2011 • (202) 628-6600

ROBERT F. BAUER
(202) 434-1602

March 10, 1992

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

92 MAR 10 PM 1:25

Lawrence R. Noble, Esq.
General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, DC 20463

Attn: Noriega E. James

Re: MUR 3104
Dwayne O. Andreas
Dorothy Ines Andreas

Dear Mr. Noble:

Our principal concern at this time is the separate finding of liability against Mrs. Andreas. She relied on her husband and his staff to assure that all their contributions complied with lawful limits. This is not an uncommon arrangement in households where one spouse is more politically active than the other. Typically, in these households, the less politically active spouse relies upon the other spouse to decide which candidates to support and the amounts of the contributions to be made to those candidates. Nevertheless, the Commission has decided to hold Mrs. Andreas liable by singling her out as a "respondent."

This approach cannot satisfy any goal or accomplish any enforcement priority objective. As I have noted in another MUR (2575) raising the same issue, the General Counsel's Office should consider the consequences of its position in this case very thoroughly. Other agencies, in particular the Internal Revenue Service, have encountered similar situations and carefully resolved them. In 1970, Congress added a provision to the tax code to address the problem caused by imposing liability on an "innocent spouse" for the filing of a fraudulent joint tax return. Under the Internal Revenue Code

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[17035-0001/DA920690.040]

a spouse filing a joint return is relieved of liability for fraudulent filings if she or he establishes that she or he did not know of the omission or other understatements constituting the fraud. 26 U.S.C. § 6013(e). The provision reads in full as follows:

> (e) SPOUSE RELIEVED OF LIABILITY IN CERTAIN CASES. -
>
> (1) IN GENERAL.-Under regulations prescribed by the Secretary, if-
>
> (A) a joint return has been made under this section for a taxable year,
>
> (B) on such return there is a substantial understatement of tax attributable to grossly erroneous items of one spouse,
>
> (C) the other spouse establishes that in signing the return he or she did not know, and had no reason to know, that there was such substantial understatement, and
>
> (D) taking into account all the facts and circumstances, it is inequitable to hold the other spouse liable for the deficiency in tax for such taxable year attributable to such substantial understatement,
>
> then the other spouse shall be relieved of liability for tax including interest, penalties, and other amount(s) for such taxable year to the extent such liability is attributable to such substantial understatement.

The rationale for granting relief to an "innocent spouse" under the tax code is fundamentally the same as the justification for granting relief in this case. It is not fair or equitable to hold one spouse liable for the actions of the other spouse. As the Senate Finance Committee stated in its report accompanying the legislation adding the "innocent spouse" provision: "[n]umerous cases have arisen in which the imposition of joint liability upon an innocent spouse has resulted in the Committee's opinion in grave injustice. . . .

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This proposal seeks to correct the unfairness in [these] situations and to bring government. . . practices into accord with basic principles of equity and fairness." S. Rep. No. 91-5137, reprinted in 1970 U.S. Code Cong. & Admin. News 6089, 6090, 6091 (emphasis added).

The text of the current tax law clearly states that the IRS must take into account "all facts and circumstances" in determining whether it is "inequitable" to hold one spouse liable for the other's execution of a fraudulent return. 26 U.S.C. § 6013(e)(1)(D). Considerations of equity compel the IRS in making this determination to focus, for example, on whether the spouse claiming relief under this provision has had any prior experience or financial responsibility in the preparation and filing of tax returns for his or her household.

Federal election law and the Internal Revenue Code intersect often and Congress has endeavored for the laws to work together smoothly. The problem posed by an "innocent spouse" in a FEC proceeding may be a situation where one agency can benefit from the experiences of the other. In addition, a decision to follow the example set by the IRS would be completely consistent with Commission decisions and regulations under the Federal Election Campaign Act which recognize the allocation of responsibilities within a household.*

In reaching the decision regarding Mrs. Andreas, the Commission appears to have taken a detour in the direction of holding the less experienced spouse liable in circumstances such as these. The Commission should not take this step lightly. Fundamental considerations of equity are involved here and it is the belief of the Andreases that settlement in this case should not proceed without excusing Mrs. Andreas from the proceedings as a separate respondent. At the most, it may make sense for Mrs. Andreas' contributions to be identified in the recitation of facts. Any suggestion that

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*Elsewhere, the Commission has recognized the special problems raised uner the statute by joint household finances. For example, the regulations allow a spouse without separate income to draw upon a joint account for an individual contribution (11 C.F.R. § 110.1(i)(l), and identify that portion of joint assests that a candidate may rely upon for collateral in obtaining a FECA regulated loan (11 C.F.R. § 100.7(a) (1)(i)(D)).

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she is a respondent with separate individual legal liability for these acts contravenes fundamental considerations of equity and fairness.

Very truly yours,

Robert F. Bauer
Counsel for Respondents

RFB:smb

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RECEIVED
F.E.C.
SECRETARIAT
92 APR 15 PM 4:10

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 3104
Henry Kravis)
Ronald O. Perelman)
Dwayne O. Andreas)
Dorothy Inez Andreas)
Ira Riklis)

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On August 3, 1990, the Commission found reason to believe that Henry Kravis violated 2 U.S.C. §§ 441a(a)(1)(A) and 441a(a)(3). Also on August 3, 1990, the Commission found reason to believe that Ronald O. Perelman, Dwayne O. Andreas, Dorothy Inez Andreas and Ira Riklis violated 2 U.S.C. § 441a(a)(3). Thereafter, on September 26, 1991, the Commission found reason to believe that Mr. Perelman and Mr. Riklis also violated 2 U.S.C. § 441a(a)(1)(A).

II. DISCUSSION

As a result of written responses to the Commission's findings and subsequent discussions with counsel, this Office recommends that the Commission proceed as follows with regard to these respondents:

Henry Kravis

The Commission originally found reason to believe that Mr. Kravis violated 2 U.S.C. § 441a(a)(3) by making contributions of $62,711 for the 1988 election, or $37,711 in excess of the annual limit and that he violated 2 U.S.C. § 441a(a)(1)(A) by making excessive contributions of $2,000 to two candidate committees. Counsel for the respondent answered

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this Office's discovery requests and produced a list of Mr. Kravis' contributions and check copies attributable to 1988. Counsel also provided supporting documents for refunds, redesignations and reattributions of certain contributions. Respondent's materials disclose that respondent made a $250 contribution to the Peter Hoagland for Congress Committee that was not included in this Office's original calculation of Mr. Kravis' contributions for 1988. The original calculation included $1,000 contributions each to the Friends of Senator David Karnes and the Challenge '88 committees. However, a review of respondent's materials discloses that respondent actually made only one $1,000 contribution to the Friends of Senator David Karnes committee and that Challenge '88, a joint fundraising committee, served as the conduit for the contribution.

In regard to the Commission's reason to believe finding that Henry Kravis violated 2 U.S.C. § 441a(a)(1)(A), by making excessive contributions, totaling $2,000, to two candidate committees, counsel noted that the excessive contributions have either been refunded or reattributed. Therefore, according to counsel, $2,000 should be deducted from the respondent's overall 1988 contribution total. However, neither the refund nor reattribution was made within 60 days of receipt and therefore they were not done timely.[1]

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1. Respondent's $1,000 contribution to the Wilson for Senate committee actually was received on June 7, 1988, and not reattributed until September 19, 1988.

Accordingly, this Office has adjusted the respondent's 1988 contribution total to $61,961[2] or $36,961 in excess of the annual limit. Counsel for Henry Kravis has requested resolution of this matter through pre-probable cause conciliation. See Attachment 1.

This Office recommends that the Commission enter into conciliation with Henry Kravis prior to a finding of probable cause to believe. Attached for the Commission's approval is a proposed conciliation agreement to resolve this matter.

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Ronald O. Perelman

On August 3, 1990, the Commission found reason to believe that Mr. Perelman violated 2 U.S.C. § 441a(a)(3) and began an investigation into the matter. On September 26, 1991, the Commission denied respondent's request for no further action and

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2. Counsel for respondent calculates this total to be $59,961. However, in addition to adding $250 for the Hoagland contribution and deleting $1,000 for the Challenge '88 contribution, counsel also deducted $2,000 which represents the excessive contributions which were not refunded or reattributed timely.

also found that there is reason to believe that respondent violated 2 U.S.C. § 441a(a)(1)(A) by making a $2,000 contribution, in the form of a check, to Moynihan for Senate Inc. which was not designated between elections nor partially attributed to his spouse in accordance with 11 C.F.R. §§ 110.1(b)(4) and 110.1(k).

In responses which were considered by the Commission prior to denying respondent's request for no further action concerning this matter, counsel argued that these issues should not be pursued based on the regulations in effect at the time, an Advisory Opinion, the contention that certain contributions are not attributable to the 1988 elections, and on the Commission's actions in certain similar enforcement matters.[3] See Attachment 2, pages 7-14. In particular, counsel argued that a $1,000 contribution to the Committee for Bill Green is attributable to the 1986 elections. However the contribution, which was undesignated, was made after the date of the 1986 general election and was not reported by the committee as being attributable to its 1986 election debt. According to counsel, at the time the contribution was made, Commission regulations were ambiguous concerning post general election contributions and former regulation 11 C.F.R. § 102.9(e) would have allowed the recipient committee to designate the contribution to be used

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3. On November 12, 1991, counsel submitted another response which advanced similar reasons for not pursuing this matter. See Attachment 2, pages 4-6.

to pay its 1986 election debt.[4] However, this argument is not on point because by the time the contribution in question was made, the respondent had already contributed the statutory limit to Bill Green for the 1986 elections. The committee would have clearly been in violation of 2 U.S.C. § 441a if it had accepted or "designated" the contribution in question for the 1986 elections. Therefore, the contribution is attributable to the 1988 election year.

Counsel also argued that a $5,000 contribution to the RNC's "Presidential Trust" was intended for the committee's non-federal account although the check was not designated as such. On March 9, 1992, counsel produced a copy of a letter from the RNC's chief counsel which states that the "Republican Party" encompasses three national party committees which conduct fundraising programs for federal and non-federal accounts and that a "contributor unfamiliar with the intricacies of party committees and fundraising projects could confuse these committees and accounts." See Attachment 2, pages 1-3. However, nothing in this letter suggests that respondent Perelman's contribution to the RNC's Presidential Trust was misdeposited into a federal account.

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4. Former 11 C.F.R. § 102.9(e) appeared to allow recipient committees to designate contributions. This regulation was revised to clarify that, effective April 8, 1987, only contributors could designate contributions. Although the Commission has not interpreted the former regulation to mean that recipients can determine election designations, the Commission has declined to proceed against recipient committees which accepted contributions for the primary or general elections in a manner that ensured compliance with 2 U.S.C. § 441a. See MURs 2543, 2127, 1696, 1674, 1648, 1637 and 1588.

Counsel further argued that a $1,000 contribution to Biden for President is not attributable to the 1988 election because Mr. Biden ceased to be a candidate in September of 1987. Counsel contends that a contributor cannot make a contribution pursuant to 11 C.F.R. § 110.5(c)(2) with respect to an election and election year if the candidate "publicly renounces his campaign." Counsel points to nothing in the statute, regulations or prior Commission determinations to support his contention. In any event, Section 110.3(c)(4)(iv) explains that an individual ceases to be a candidate in an election on the date that the candidate publicly announces he or she will no longer be a candidate. A review of the Commission's records and disclosure reports discloses that Mr. Perelman made his contribution and that the committee apparently used the contribution before Mr. Biden announced that he would no longer be a candidate in the 1988 elections. Therefore, the contribution is correctly attributed to the 1988 calendar year.

Finally, counsel argued that a $2,000 contribution to Moynihan for Senate Inc., which was made in 1986, should not count against respondent's 1988 annual contribution limit because it is "unreasonable" to expect an individual contributor to realize that a contribution made in 1986 would count against his 1988 calendar year limit. Counsel also argued that the Commission should take no further action on its reason to believe finding that respondent violated 2 U.S.C. § 441a(a)(1)(A) in regard to the Moynihan contribution. Counsel argued that although respondent did not designate his $2,000

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contribution between elections, the committee, on its own, designated the contribution in a manner that was consistent with the respondent's intent. Again, counsel raises the argument that former 11 C.F.R. § 102.9(e) appeared to allow the recipient committee to assign contributions to a particular election. Counsel noted that in Advisory Opinion 1980-67, the Commission cited former regulation 11 C.F.R. § 102.9(e) as support for allowing the recipient committee to redesignate contributions. Counsel also noted that in certain MURs, where the application of former regulation 11 C.F.R. § 102.9(e) was an issue, the Commission determined to find reason to believe and then take no further action against contributors and recipient committees where the regulation was applied in a manner that ensured compliance with 2 U.S.C. § 441a. See Attachment 2, pages 7-14. However the matter here is distinguishable from the previous matters cited by respondent for two reasons. First, except for a few $1,000 excessive contributions, the amount of money involved with respect to each individual contributor was very small. Secondly, with respect to each contributor, there was only one violation of the Act at issue.

In short, respondent's supplemental materials and arguments fail to establish that any of the disputed contributions should be excluded from respondent's 1988 contribution total. Therefore, this Office recommends that the Commission reject respondent's request to take no further action in this matter. In an effort to expedite the resolution of this matter, this Office also recommends that the Commission offer to

9304093428 83

enter into conciliation with Ronald O. Perelman prior to a finding of probable cause to believe. Attached for the Commission's approval is a proposed conciliation agreement.

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Dwayne O. Andreas and Dorothy Inez Andreas

On August 3, 1990, the Commission found reason to believe that Dwayne O. Andreas and Dorothy Inez Andreas violated 2 U.S.C. § 441a(a)(3). On September 26, 1991, per respondents' requests, the Commission determined to enter into preprobable cause conciliation with each respondent. Thereafter, this Office received respondents' designations of counsel and began conciliation negotiations.

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In this most recent response, counsel sought to draw an analogy between Mrs. Andreas' situation and the situation covered by 26 U.S.C. § 6013(e), a section of the tax code which relieves a spouse of liability when that spouse unknowingly signs a joint tax return which contains a

substantial understatement of tax attributable to grossly erroneous items of the other spouse. Counsel asserted that the rationale for granting relief in such situations was fundamentally the same as the justification for granting relief to Mrs. Andreas: "[i]t is not fair or equitable to hold one spouse liable for the actions of the other spouse."[5]

As a threshold matter, the section of law cited by counsel is part of the tax code and not the Federal Election Campaign Act. By no means is the Commission required to follow that section. Moreover, Commission regulations seek to insure that each spouse knows of and takes full responsibility for all contributions attributed to each of them by prohibiting contributions which are made in the name of another and by requiring that joint contributions be signed by both spouses. See 11 C.F.R. §§ 110.4(b) and 110.1(k). In this regard, there is nothing in the responses and materials submitted that would suggest that the contributions which are attributed to Mrs. Andreas were not made in accordance with these regulations. On the contrary, Mrs. Andreas' original response clearly indicated that she takes full responsibility for the contributions which are attributed to her. See Attachment 3, pages 17-19. Although inaccurate advice from her spouse may be a mitigating factor in this matter, it does not warrant a finding of no further action with regard to Mrs. Andreas'

5. The same argument regarding spousal liability is being made by respondents in MUR 2575.

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violation. Accordingly, this Office recommends that the Commission deny counsel's request to take no further action against Dorothy Inez Andreas in this matter.

Ira Riklis

Attached is a conciliation agreement which has been signed on behalf of Ira Riklis.

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This Office recommends that the Commission accept the

attached signed conciliation agreement with Ira Riklis and close its file in this matter as it pertains to him.

III. **RECOMMENDATIONS**

1. Enter into conciliation with Henry Kravis prior to a finding of probable cause to believe.

2. Deny the request to take no further action against Ronald O. Perelman.

3. Enter into conciliation with Ronald O. Perelman prior to a finding of probable cause to believe.

4. Deny the request to take no further action against Dorothy Inez Andreas.

5. Accept the attached signed conciliation agreement with Ira Riklis and close the file in this matter as it pertains to him.

6. Approve the attached proposed conciliation agreements and the appropriate letters.

Lawrence M. Noble
General Counsel

Date 4/15/92

BY: [signature]
Lois G. Lerner
Associate General Counsel

Attachments
1. Request for conciliation (Henry Kravis)
2. Response from Ronald O. Perelman
3. Responses from Dorothy and Dwayne Andreas
4. Signed conciliation agreement (Ira Riklis)
5. Proposed Conciliation Agreements (3)

Staff assigned: Noriega E. James

93040934288

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Henry Kravis;	)	MUR 3104
Ronald O. Perelman;	)	
Dwayne O. Andreas;	)	
Dorothy Inez Andreas;	)	
Ira Riklis.	)	

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CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on April 21, 1992, the Commission decided by a vote of 6-0 to take the following actions in MUR 3104:

1. Enter into conciliation with Henry Kravis prior to a finding of probable cause to believe.

2. Deny the request to take no further action against Ronald O. Perelman.

3. Enter into conciliation with Ronald O. Perelman prior to a finding of probable cause to believe.

4. Deny the request to take no further action against Dorothy Inez Andreas.

(Continued)

5. Accept the signed conciliation agreement with Ira Riklis and close the file in this matter as it pertains to him.

6. Approve the proposed conciliation agreements and the appropriate letters, as recommended in the General Counsel's Report dated April 15, 1992.

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

Attest:

4-22-92
Date

Delores R. Harris
for Marjorie W. Emmons
Secretary of the Commission

Received in the Secretariat: Wed., April 15, 1992 4:10 p.m.
Circulated to the Commission: Thurs., April 16, 1992 4:00 p.m.
Deadline for vote: Tues., April 21, 1992 4:00 p.m.

dr

9304093342290

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 28, 1992

Robert F. Bauer, Esquire
Perkins Coie
607 Fourteenth Street, N.W., Suite 800
Washington, D.C. 20005-2011

RE: MUR 3104
Dwayne O. Andreas
Dorothy Inez Andreas

Dear Mr. Bauer:

On August 3, 1990, the Commission found reason to believe that Dwayne O. Andreas and Dorothy Inez Andreas violated 2 U.S.C. § 441a(a)(3). On October 11, 1991, your clients were notified that, at their requests, the Federal Election Commission determined to enter into negotiations directed toward reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe. On the same date, your clients were sent conciliation agreements offered by the Commission in settlement of this matter.

On April 21, 1992, after reviewing your response, dated March 9, 1992, the Commission determined to deny the request to take no further action against Dorothy Inez Andreas in this matter.

The Commission is still hopeful that this matter can be settled through a conciliation agreement. Insofar as the 30 day period for pre-probable cause conciliation has elapsed, you should respond within five days of your receipt of this notification. If a response is not received within this period this matter will proceed to the next stage of the enforcement process.

If you have any further questions, please contact me at (202) 219-3400.

Sincerely,

Noriega E. James

Noriega E. James
Paralegal

Enclosure
Conciliation Agreement

93040934291

FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

April 28, 1992

Kenneth S. Levine, Esquire
Wunder, Ryan, Cannon & Thelen
1615 L Street, N.W., Suite 650
Washington, DC 20036

RE: MUR 3104
Henry Kravis

Dear Mr. Levine:

On August 3, 1990, the Federal Election Commission found reason to believe that Henry Kravis violated 2 U.S.C. §§ 441a(a)(3) and 441a(a)(1)(A). At your request, on April 21, 1992, the Commission determined to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If your client agrees with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible.

If you have any questions or suggestions for changes in the agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact me at (202) 219-3400.

Sincerely,

Noriega E. James

Noriega E. James
Paralegal

Enclosure
Conciliation Agreement

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 28, 1992

Kenneth A. Gross, Esquire
Skadden, Arps, Slate, Meagher & Flom
1440 New York Avenue, N.W.
Washington, D.C. 20005-2107

RE: MUR 3104
Ronald O. Perelman

On August 3, 1990, the Commission found reason to believe that Ronald O. Perelman violated 2 U.S.C. § 441a(a)(3) and began an investigation into this matter. On September 26, 1991, the Commission denied your client's request for no further action concerning the violation of 2 U.S.C. § 441a(a)(3). On the same date, the Commission also found reason to believe that your client violated 2 U.S.C. § 441a(a)(1)(A).

On April 21, 1992, after reviewing the subsequent responses submitted on behalf of your client, the Commission determined to deny the request to take no further action against your client concerning the violations. However, in order to expedite the resolution of this matter, the Commission has also decided to offer to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe. Enclosed is a conciliation agreement that the Commission has approved.

If your client is interested in expediting the resolution of this matter by pursuing preprobable cause conciliation and if your client agrees with the provisions of the enclosed agreement, please sign and return the agreement, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible. If a response is not received within this period, this matter will proceed to the next stage of the enforcement process.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Noriega E. James

Noriega E. James
Paralegal

Enclosure
Conciliation Agreement

93040934293

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 28, 1992

Lyn Utrecht, Esquire
Manatt, Phelps & Phillips
1200 New Hampshire Avenue, N.W.
Suite 200
Washington, DC 20036

RE: MUR 3104
Ira Riklis

Dear Ms. Utrecht:

On April 21, 1992, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on your client's behalf in settlement of violations of 2 U.S.C. §§ 441a(a)(3) and 441a(a)(1)(A), provisions of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter as it pertains to your client.

This matter will become a part of the public record within 30 days after it has been closed with respect to all other respondents involved. 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 that 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.

The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

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Enclosed you will find a copy of the fully executed conciliation agreement for your files. If you have any questions, please contact me at (202) 219-3400

Sincerely,

Noriega E. James
Paralegal

Enclosure
Conciliation Agreement

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Ira Riklis	)	MUR 3104
	)	

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission ("Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that Ira Riklis ("Respondent") violated 2 U.S.C. §§ 44la(a)(3) and 44la(a)(l)(A).

NOW, THEREFORE, the Commission and the Respondent, having participated in informal methods of conciliation prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondent and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 2 U.S.C. § 437g(a)(4)(A)(i).

II. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondent enters voluntarily into this agreement with the Commission.

IV. The pertinent facts in this matter are as follows:

1. Respondent Ira Riklis is an individual contributor to political committees for the 1988 elections.

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2. 2 U.S.C. § 441a(a)(3) limits total contributions by an individual in any calendar year to $25,000. 11 C.F.R. § 110.5(c)(2) states that any contribution to a candidate or authorized committee with respect to a particular election made in a non-election year shall be considered to be made during the calendar year in which such election is held.

3. The FEC review of contributions made for the 1988 elections revealed that respondent made contributions totaling $31,500 or $6,500 in excess of the annual limit.

4. Respondent contends that he did not intend his $15,000 contribution to the "Presidential Trust" to be used in connection with federal elections. Upon learning his check had been deposited in a federal account by the RNC, respondent requested, and on April 30, 1990, received a refund of $5,000.

6. 2 U.S.C. § 441a(a)(1)(A) limits individual contributions to federal candidates to $1,000 per election.

7. A review of contributions and check copies provided by the respondent revealed that during 1988, the respondent made contributions to two candidates totaling $3,000 in excess of the limits.

8. Respondent contends that these contributions were intended to be joint contributions from respondent and his spouse. However, her signature did not appear on the checks or accompanying documents as required under 11 C.F.R. § 110.1(k).

V. 1. Respondent made contributions in excess of the annual contribution limit for 1988 in violation of 2 U.S.C. § 441a(a)(3).

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2. Respondent made contributions in excess of the limitations in violation of 2 U.S.C. § 44la(a)(1)(A).

3. Respondent contends that the violations were not knowing and wilful.

VI. Respondent will pay a civil penalty to the Federal Election Commission in the amount of two thousand five hundred dollars ($2,500), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VII. 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.

VIII. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

IX. Respondent shall have no more than 30 days from the date this agreement becomes effective to comply with and implement the requirement contained in this agreement and to so notify the Commission.

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X. 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

BY: Lois G. Lerner — 4/28/92
Lois G. Lerner — Date
Associate General Counsel

FOR THE RESPONDENT:

Lyn Utrecht — March 2, 1992
Lyn Utrecht — Date
Manatt, Phelps, Phillips & Kantor

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 3104
Raymond Kravis)

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a conciliation agreement which has been signed on behalf of Raymond Kravis.

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This Office recommends that the Commission accept the attached signed conciliation agreement with Raymond Kravis and close its file in this matter as it pertains to him.

II. **RECOMMENDATIONS**

1. Accept the attached conciliation agreement with Raymond Kravis.

2. Close the file as to this respondent.

3. Approve the appropriate letter.

Lawrence M. Noble
General Counsel

4/20/92
Date

BY:

Lois G. Lerner
Associate General Counsel

Attachments
1. Conciliation Agreement
2. Respondent's response

Staff Assigned: Noriega E. James

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Raymond Kravis.) MUR 3104

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on April 24, 1992, the Commission decided by a vote of 5-0 to take the following actions in MUR 3104:

1. Accept the conciliation agreement with Raymond Kravis, as recommended in the General Counsel's Report dated April 20, 1992.

2. Close the file as to this respondent.

3. Approve the appropriate letter, as recommended in the General Counsel's Report dated April 20, 1992.

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

Attest:

4-24-92
Date

Marjorie W. Emmons
Secretary of the Commission

Received in the Secretariat: Tues., April 21, 1992 11:16 a.m.
Circulated to the Commission: Tues., April 21, 1992 4:00 p.m.
Deadline for vote: Fri., April 24, 1992 4:00 p.m.

dr

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 28, 1992

Kenneth S. Levine, Esquire
Wunder, Ryan, Cannon & Thelen
1615 L Street, N.W., Suite 650
Washington, DC 20036

RE: MUR 3104
Raymond Kravis

Dear Mr. Levine:

On April 24, 1992, the Federal Election Commission accepted the signed conciliation agreement submitted on your client's behalf in settlement of a violation of 2 U.S.C. § 441a(a)(3), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter your client.

This matter will become a part of the public record within 30 days after it has been closed with respect to all other respondents involved. 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 that 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.

The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

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Enclosed you will find a copy of the fully executed conciliation agreement for your files. Please note that the civil penalty is due within 30 days of the conciliation agreement's effective date. If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Noriega E. James
Paralegal

Enclosure
Conciliation Agreement

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Raymond Kravis) MUR 3104
)

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission ("Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that Raymond Kravis ("Respondent") violated 2 U.S.C. § 441a(a)(3).

NOW, THEREFORE, the Commission and the Respondent, having participated in informal methods of conciliation prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondent and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 2 U.S.C. § 437g(a)(4)(A)(i).

II. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondent enters voluntarily into this agreement with the Commission.

IV. The pertinent facts in this matter are as follows:

1. Respondent Raymond Kravis is an individual contributor to political committees for the 1988 elections.

2. 2 U.S.C. § 441a(a)(3) limits total contributions by an individual in any calendar year to $25,000. 11 C.F.R. § 110.5(c)(2) states that any contribution to a candidate or

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authorized committee with respect to a particular election made in a non-election year shall be considered to be made during the calendar year in which such election is held.

3. The FEC review of contributions made for the 1988 elections revealed that Respondent made contributions totaling $31,250 or $6,250 in excess of the annual limit.

4. Respondent contends that $1,200 of this amount was intended to be contributions from his spouse and indicated so in writing at the time of those contributions. However, her signature did not appear on the checks or accompanying documents as required under 11 C.F.R. § 110.1(k).

5. On September 17 and 18, 1990, Respondent received refunds totaling $6,800, thus putting Respondent below the $25,000 annual limit on contributions to 1986 political committees.

V. Respondent made contributions in excess of the annual contribution limit for 1988 in violation of 2 U.S.C. § 441a(a)(3). Respondent contends that the violation was not knowing and willful.

VI. Respondent will pay a civil penalty to the Federal Election Commission in the amount of One Thousand Dollars ($1,000), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VII. 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

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the District of Columbia.

VIII. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

IX. Respondent shall have no more than 30 days from the date this agreement becomes effective to comply with and implement the requirement contained in this agreement and to so notify the Commission.

X. 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

BY: _____ 4/28/92
Lois G. Lerner
Associate General Counsel
Date

FOR THE RESPONDENT:

_____ 4/16/92
(Name)
(Position)
Date

9304093433 08

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 24, 1992

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Phil Beck, Esquire
Kirkland & Ellis
200 East Randolph Drive
Chicago, Illinois 60601

RE: MUR 3104

Dear Mr. Beck:

On January 28, 1992, the Federal Election Commission and your client, Harold C. Simmons entered into a conciliation agreement in settlement of violations of 2 U.S.C §§ 441a(a)(1)(A) and (C), and 441a(a)(3). According to the agreement your client was required to pay a civil penalty of $19,800.00 within thirty days of the fully executed agreement.

According to Commission records no payment has been received. Please be advised that, pursuant to 2 U.S.C. § 437g(a)(5)(D), violation of any provision of the conciliation agreement may result in the institution of a civil suit for relief in the United States District Court. Unless we receive the payment in five days, this Office will recommend that the Commission file suit to remedy this violation.

If you believe the Commission's records are in error, or if you have any questions, please contact me at (202) 219-3400.

Sincerely,

Noriega E James

Noriega James
Paralegal

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KIRKLAND & ELLIS
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

200 East Randolph Drive
Chicago, Illinois 60601

Philip S. Beck
To Call Writer Direct:
312 861-2388

312 861-2000

Facsimile:
312 861-2200

May 1, 1992

92 MAY -6 PM 3:46

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

Registered & Certified

Mr. Noriega James, Paralegal
Federal Election Commission
Washington, D.C. 20463

Re: MUR 3104

Dear Mr. James:

Enclosed is a check for $19,800 in settlement of the above matter.

Sincerely,

Philip S. Beck

PSB/dec
Encl:

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92 MAY -6 PM 3:46

Mutual Disbursement Account

KIRKLAND & ELLIS
200 East Randolph Drive Chicago, Illinois 60601

No. 600145

70-2328
719

CONTINENTAL BANK
CHICAGO, ILLINOIS 60697

	Check No.	Date	Amount
Pay $19,800.00	600145	5/01/92	$19,800.00

To the Order Of: FEDERAL ELECTION COMMISSION
WASHINGTON DC 20463

KIRKLAND & ELLIS
Mutual Disbursement Account

Mary Pat Chall
Fletcher M Rucinski

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WUNDER, DIEFENDERFER, RYAN, CANNON & THELEN
1615 L STREET, N.W., SUITE 650
WASHINGTON, D. C. 20036

(202) 659-3005

KENNETH S. LEVINE

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May 15, 1992

Noriega E. James, Esq.
Federal Election Commission
Washington, D.C. 20463

RE: MUR 3104
Raymond Kravis

Dear Mr. James:

Please find enclosed a check in the amount of $1,000 payable to the Federal Election Commission pursuant to the conciliation agreement entered into by Mr. Raymond Kravis and the Federal Election Commission on April 28, 1992.

If you have any questions, please let me know.

Sincerely,

Kenneth S. Levine

Enclosures

9304093431 2

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 1, 1992

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Kenneth S. Levine, Esquire
Wunder, Ryan, Cannon & Thelen
1615 L Street, N.W., Suite 650
Washington, DC 20036

RE: MUR 3104
Henry Kravis

Dear Mr. Levine:

On April 28, 1992, you were notified that, at your request, the Federal Election Commission determined to enter into negotiations directed toward reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe. On that same date you were sent a conciliation agreement offered by the Commission in settlement of this matter.

Please note that conciliation negotiations entered into prior to a finding of probable cause to believe are limited to a maximum of 30 days. The 30 day period for negotiations has expired. Unless we receive a signed conciliation agreement from you within five days, this Office will consider these negotiations terminated and will proceed to the next stage of the enforcement process.

Should you have any questions, please contact me at (202) 219-3400.

Sincerely,

Noriega E. James
Paralegal

9304093433

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 4, 1992

Robert F. Bauer, Esquire
Perkins Coie
607 Fourteenth Street, N.W., Suite 800
Washington, D.C. 20005-2011

RE: MUR 3104
Dwayne O. Andreas
Dorothy Inez Andreas

Dear Mr. Bauer:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, on August 3, 1990, the Federal Election Commission found reason to believe that your clients, Dwayne O. Andreas and Dorothy Inez Andreas, violated 441a(a)(3), and instituted an investigation in 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 recommendation. 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 (ten 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 Noriega E. James, the staff member assigned to this matter, at (202) 219-3400.

Sincerely,

Lawrence M. Noble
General Counsel

Enclosure
Brief

93040934315

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 3104
Dwayne O. Andreas	)	
Dorothy Inez Andreas	)	

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

Based on allegations in a Los Angeles Times newspaper article, the Commission found reason to believe that Dwayne O. Andreas and Dorothy Inez Andreas violated 2 U.S.C. § 441a(a)(3) by making contributions in excess of the annual limit. Dwayne and Dorothy Andreas have responded to the Commission's finding and to discovery requests. The Office of the General Counsel thoroughly analyzed the responses, reviewed check copies and other documentation submitted, and compared information in the responses with items on disclosure reports.

II. ANALYSIS

2 U.S.C. § 441a(a)(3) limits total contributions by an individual in any calendar year to $25,000. The statute also states that any contribution made to a candidate in a year other than the calendar year in which the election is held, with respect to which such contribution is made, is considered to be made during the calendar year in which such election is held. See also 11 C.F.R. § 110.5(c)(2) (any contribution to a candidate or authorized committee with respect to a particular election made in a non-election year shall be considered to be made during the calendar year in which such election is held).

The Commission's review of contributions made for the 1988

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elections revealed that respondent Dwayne O. Andreas made contributions totaling $38,680, or $13,680 in excess of the annual limit, and that respondent Dorothy Inez Andreas made contributions totaling $29,680, or $4,680 in excess of the annual limit.

Therefore, based on the evidence of excessive contributions made by the respondents, the Office of the General Counsel is prepared to recommend that the Commission find probable cause to believe that Dwayne O. Andreas and Dorothy Inez Andreas violated 2 U.S.C. § 441a(a)(3) in this matter.

III. GENERAL COUNSEL'S RECOMMENDATION

Find probable cause to believe that Dwayne O. Andreas and Dorothy Inez Andreas violated 2 U.S.C. § 441a(a)(3).

6/3/92
Date

Lawrence M. Noble
General Counsel

9304093437

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 10, 1992

Kenneth S. Levine, Esquire
Wunder, Ryan, Cannon & Thelen
1615 L Street, N.W., Suite 650
Washington, DC 20036

RE: MUR 3104
Henry Kravis

Dear Mr. Levine:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, on August 3, 1990, the Federal Election Commission found reason to believe that your client, Henry Kravis, violated 2 U.S.C. §§ 441a(a)(3) and 441a(a)(1)(A), and instituted an investigation in 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 recommendation. 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 (ten 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 Noriega E. James, the staff member assigned to this matter, at (202) 219-3400.

Sincerely,

Lawrence M. Noble
General Counsel

Enclosure
Brief

9304093419

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 3104
Henry Kravis	)	

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

Based on allegations in a Los Angeles Times newspaper article, the Commission found reason to believe that Henry Kravis violated 2 U.S.C. § 441a(a)(3) by making contributions in excess of the annual limit and that he violated 2 U.S.C. § 441a(a)(1)(A) by exceeding the amount an individual may contribute to a candidate per election. Henry Kravis has responded to the Commission's finding and to discovery requests. The Office of the General Counsel thoroughly analyzed the response, reviewed check copies and other documentation submitted, and compared information in the response with items on disclosure reports.

II. ANALYSIS

2 U.S.C. § 441a(a)(3) limits total contributions by an individual in any calendar year to $25,000. The statute also states that any contribution made to a candidate in a year other than the calendar year in which the election is held, with respect to which such contribution is made, is considered to be made during the calendar year in which such election is held. See also 11 C.F.R. § 110.5(c)(2) (any contribution to a candidate or authorized committee with respect to a particular election made in a non-election year shall be considered to be

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made during the calendar year in which such election is held).

2 U.S.C. § 441a(a)(1)(A) limits contributions by an individual to a federal candidate to $1,000 per election.

The Commission's review of contributions made for the 1988 elections revealed that respondent made contributions totaling $61,961, or $36,961 in excess of the annual limit and excessive contributions to two candidate committees, totaling $2,000 in excess of the per election limit.

Therefore, based on the evidence of excessive contributions made by the respondent, the Office of the General Counsel is prepared to recommend that the Commission find probable cause to believe that Henry Kravis violated 2 U.S.C. §§ 441a(a)(3) and 441a(a)(1)(A) in this matter.

III. GENERAL COUNSEL'S RECOMMENDATION

Find probable cause to believe that Henry Kravis violated §§ 441a(a)(3) and 441a(a)(1)(A).

6/5/92
Date

Lawrence M. Noble
General Counsel

2304093432 1

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 26, 1992

Kenneth A. Gross, Esquire
Skadden, Arps, Slate, Meagher & Flom
1440 New York Avenue, N.W.
Washington, D.C. 20005-2107

RE: MUR 3104
Ronald O. Perelman

Dear Mr. Gross:

9304093432 2

After considering all the evidence available to the Commission and in light of our inability to settle this matter through preprobable cause conciliation, 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 recommendation. 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 (ten 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.

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 Noriega E. James, the staff member assigned to this matter, at (202) 219-3400.

Sincerely,

LM Noble (JH2)

Lawrence M. Noble
General Counsel

Enclosure
Brief

9304093433323

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 3104
Ronald O. Perelman	)	

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

Based on allegations in a Los Angeles Times newspaper article, the Commission found reason to believe that Ronald O. Perelman violated 2 U.S.C. § 441a(a)(3) by making contributions in excess of the annual limit and that he violated 2 U.S.C. § 441a(a)(1)(A) by exceeding the amount an individual many contribute to a candidate per election. Ronald O. Perelman has responded to the Commission's finding and to discovery requests. The Office of the General Counsel thoroughly analyzed the response, reviewed check copies and other documentation submitted, and compared information in the response with items on disclosure reports.

II. ANALYSIS

2 U.S.C. § 441a(a)(3) limits total contributions by an individual in any calendar year to $25,000. The statute also states that any contribution made to a candidate in a year other than the calendar year in which the election is held, with respect to which such contribution is made, is considered to be made during the calendar year in which such election is held. See also 11 C.F.R. § 110.5(c)(2) (any contribution to a candidate or authorized committee with respect to a particular election made in a non-election year shall be considered to be

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made during the calendar year in which such election is held).

2 U.S.C. § 441a(a)(1)(A) limits contributions by an individual to a federal candidate to $1,000 per election.

The Commission's review of contributions made for the 1988 elections revealed that respondent made contributions totaling $32,500, or $7,500 in excess of the annual limit and contributions to a candidate committees, totaling $1,000 in excess of the per election limit.

Therefore, based on the evidence of excessive contributions made by the respondent, the Office of the General Counsel is prepared to recommend that the Commission find probable cause to believe that Ronald O. Perelman violated 2 U.S.C. §§ 441a(a)(3) and 441a(a)(1)(A) in this matter.

III. GENERAL COUNSEL'S RECOMMENDATION

Find probable cause to believe that Ronald O. Perelman violated §§ 441a(a)(3) and 441a(a)(1)(A).

Date

Lawrence M. Noble
General Counsel

9304093425

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
92 JUN 29 AM 9:03

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 3104
Dwayne O. Andreas	)	
Dorothy Inez Andreas	)	

RESPONSE TO GENERAL COUNSEL'S BRIEF

I. Introduction

Somewhat to Respondents' surprise, the General Counsel's brief does not address the critical issues preventing resolution of this matter.

At no time has Mr. Andreas disputed his own personal responsibility for exceeding the $25,000 annual limit. All the same, he is seeking an adequate record, appropriate for inclusion in the conciliation agreement, of the factual circumstances giving rise to his failure to meet that responsibility. The Commission and its General Counsel do not appear willing to yield on this question of fact.

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II. **The Conciliation Agreement:**

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IV. Note on General Counsel's Brief

The General Counsel's brief has set out a position which does not clarify the issues standing in the way of a resolution. The brief simply states that the Andreases each exceeded their annual limitation for the period in question. This was previously known. The question has never been

whether the limitations were violated, only how those violations should be treated for purposes of structuring a resolution.

These involve "factual issues": the law in place at the time contributions were made, and the reliance of Mrs. Andreas on her husband's knowledge of the federal legal limitations on individual political contributions. The General Counsel's brief, by avoiding these issues, has failed to permit the proper framing of this case for Commission review.

Accordingly the Andreases respectively request that the General Counsel present views on these issues in an amended probable cause brief, so that the Commission can properly evaluate the issues.

6-26-92
Date

Robert F. Bauer
Counsel to Respondents

9304093433 1

WUNDER, DIEFENDERFER, RYAN, CANNON & THELEN
1615 L STREET, N.W., SUITE 650
WASHINGTON, D. C. 20036

(202) 659-3005

KENNETH S. LEVINE

July 2, 1992

92 JUL -7 AM 10:43

Lawrence M. Noble, Esquire
General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

RE: MUR 3104
Henry Kravis

Dear Mr. Noble:

By that notification I was also advised that my response to the General Counsel is due on July 15, 1992. I am hereby requesting an extension of time until August 4, 1992 to respond to the brief. I will be out of town on pre-arranged business matters and attending the Democratic National Convention between now and July 15, 1992, and as a result would not have an opportunity to adequately respond to the brief within the fifteen day period.

For this reason, I request an extension of twenty days setting the new deadline on August 4, 1992. Thank you for your consideration of this request. I can be reached at 202/659-3005.

Sincerely,

Kenneth S. Levine

9304093433332

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 10, 1992

Kenneth S. Levine, Esquire
Wunder, Ryan, Cannon & Thelen
1615 L Street, N.W., Suite 650
Washington, DC 20036

RE: MUR 3104
Henry Kravis

Dear Mr. Levine:

This is in response to your letter dated July 2, 1992, requesting an extension of 20 days to respond to the General Counsel's brief. After considering the circumstances presented in your letter, the Office of the General Counsel has granted the requested extension. Accordingly, your response is due by the close of business on August 4, 1992.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Noriega E. James

Noriega E. James
Paralegal

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9383 OGC#5131

SENT BY:14 : 7-13-92 5:16PM : 9383 202 376 2146;# 2

SKADDEN, ARPS, SLATE, MEAGHER & FLOM

1440 NEW YORK AVENUE, N.W.
WASHINGTON, D.C. 20005-2107

(202) 371-7000

FAX (202) 393-5760

DIRECT DIAL
(202) 371-

BOSTON
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NEW YORK
SAN FRANCISCO
SYDNEY
TOKYO
TORONTO
WILMINGTON

July 13, 1992

VIA FAX

Mr. Noriega E. James
Federal Election Commission
999 E Street, Nortwest
Washington, D.C. 20463

Re: MUR 3104
Ronald O. Perelman

Dear Mr. James:

This letter will confirm our recent conversation concerning our request for a twenty day extension of time to file a response to the General Counsel's brief in the above referenced matter. We received the General Counsel's brief on July 1, 1992. If granted the 20 days, our brief will be due on August 5, 1992.

We need the additional time to respond because I will be out of the office the week of July 13, 1992, attending the Democratic National Convention.

Thank you for your consideration of this request.

Sincerely,

Kenneth A. Gross

9304093433334

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 16, 1992

Kenneth A. Gross, Esquire
Skadden, Arps, Slate, Meagher & Flom
1440 New York Avenue, N.W.
Washington, D.C. 20005-2107

RE: MUR 3104
Ronald O. Perelman

Dear Mr. Gross:

This is in response to your letter dated July 13, 1992, requesting an extension of 20 days to respond to the General Counsel's brief. After considering the circumstances presented in your letter, the Office of the General Counsel has granted the requested extension. Accordingly, your response is due by the close of business on August 5, 1992.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Noriega E. James
Paralegal

9304093433335

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 29, 1992

Kenneth A. Gross, Esquire
Skadden, Arps, Slate, Meagher & Flom
1440 New York Avenue, N.W.
Washington, D.C. 20005-2107

RE: MUR 3104
Ronald O. Perelman

Dear Mr. Gross:

Per our discussion today, the Office of the General Counsel has granted the requested extension. Accordingly, your response is due by the close of business on August 7, 1992.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Noriega E. James

Noriega E. James
Paralegal

9304009334336

OGC6002

WUNDER, DIEFENDERFER, RYAN, CANNON & THELEN
1615 L STREET, N.W., SUITE 650
WASHINGTON, D. C. 20036

(202) 659-3005

KENNETH S. LEVINE

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
92 AUG -4 PM 4:12

August 4, 1992

Lawrence M. Noble
General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D. C. 20463

RE: MUR 3104
Henry Kravis

Dear Mr. Noble:

Enclosed is our response to the General Counsel's Probable Cause Brief.

As you requested, I have enclosed three copies of the response. If you have any questions or desire additional information, please let me know.

Sincerely,

Kenneth S. Levine

ksl/kjr
Enclosures

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RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
92 AUG -4 PM 4:

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	**MUR 3104**
Henry Kravis	)	

RESPONSE TO PROBABLE CAUSE BRIEF

By letter dated June 10, 1992, respondent Henry Kravis was notified that the General Counsel is prepared to recommend that the Commission find probable cause to believe in the above referenced matter. This response is hereby submitted to the General Counsel's Brief.

BACKGROUND

In March 1990, it came to the attention of Henry Kravis that contributions he made related to the 1988 election cycle may have exceeded his 1988 annual contribution limit.[1] As set forth in his affidavit (Attachment A), the apparent excessive amount of these contributions was entirely unintentional and was based on the following: Mr. Kravis' belief that $25,000 of these contributions were made to non-federal committees; the incorrect designations of some of his candidate contributions by the candidate committees; and lack of awareness that contributions Mr. Kravis made in 1987 to candidates for election in 1988 counted towards his 1988 limit.

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[1] There is a discrepancy of $2,000 between the amount of 1988 contributions as calculated by the Office of General Counsel and by Mr. Kravis. This discrepancy relates to contributions to the Heinz and Wilson campaigns. Both of these matters were resolved in 1988. The Heinz contribution was initially improperly reported by the Committees for the general election and was ultimately refunded to Mr. Kravis on October 27, 1988. Had it been properly attributed by the Committee in the first place, there would have been no need for a refund. The excess $1,000 Wilson contribution was intended as a contribution from Mr. Kravis' spouse, Carolyne Roehm, and was formally designated as such in September 1988. These contributions to Heinz and Wilson were clearly within the joint contribution limits of Mr. Kravis and his spouse for the primary and general elections. The failure of the Committees in question to properly attribute and redesignate these contributions should not result in the finding of any additional violation by Mr. Kravis.

$16,250 of his 1988 candidate contributions were actually made in 1987.

As soon as Mr. Kravis was aware that he may have exceeded his 1988 annual limit, he took immediate steps to request refunds and make appropriate redesignation of these contributions. These steps were taken in March 1990, months before Mr. Kravis received the FEC notification of this matter on August 23, 1990. In all, Mr. Kravis obtained $36,000 in refunds of redesignation.

On August 23, 1990, Mr. Kravis received notification that the FEC found reason to believe that he exceeded his 1988 annual limit in violation of 2 U.S.C. § 441a(a) (3), and that he made excessive contributions to two federal candidates in violation of 2 U.S.C. § 441a(a) (1). Accompanying this notification were interrogatories and a request for documents. In response, Mr. Kravis submitted complete information including copies of checks relating to his 1988 contributions, and explained fully why the individual candidate contributions were not excessive, as well as the reasons why he had no idea that he had exceeded his 1988 annual limit.

After the Commission and respondent failed to reach pre-probable cause conciliation in this matter on June 26, 1992, Mr. Kravis received notification that the General Counsel is prepared to recommend probable cause to believe that he violated the Act by exceeding the 1988 annual limit.

The General Counsel's Brief in this matter is 1-1/2 pages long and does not address any of the arguments or responses made by Mr. Kravis at any point during this two year process, either in his written responses or in his counsel's discussions with staff. It does not acknowledge that the allegedly excessive individual contributions were in fact redesignated or refunded before the election in 1988 some two years before the FEC first looked at this matter; it does not

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address Mr. Kravis' belief that $25,000 in contributions to committees were made for non-federal purposes; it does not respond to Mr. Kravis' misunderstanding as to the method of counting candidate contributions attributable to the annual limit; and it does not acknowledge that that full amount of excessive contributions were remedied prior to the FEC notification of its initial finding in this matter.

ARGUMENT

As recently as March 1992, the FEC has recommended to Congress a statutory change in the manner of calculation of the individual overall annual contribution limit of 2 U.S.C. §441a (a) (3). In its 1992 Legislative Recommendations the Commission stated:

> This provision has led to some confusion among contributors. For example, a contributor wishing to support Candidate Smith in an election year contributes to her in November of the year before the election. The contributor assumes that the contribution counts against his limit for the year in which he contributed. Unaware that the contribution actually count against the year in which Candidate Smith's election is held, the contributor makes other contributions during the election year and inadvertently exceeds his $25,000 limit.... By requiring contributions to count against the limit of the calendar year in which the donor contributes, confusion would be eliminated and fewer contributors would inadvertently violate the law.

Thus, the Commission itself has acknowledged that the annual limit is confusing and that here is a widespread misunderstanding as to the proper method for counting contributions attributable to the limit. As a result, the Commission has explicitly recommended that contributions count toward the annual limit for the year in which they are <u>made</u> by the contributor and not for the year of the election to which they pertain. Mr. Kravis is clearly not

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alone in his misunderstanding as to which contributions count toward to the annual limit.

I. Mr. Kravis did not believe that he made contributions in excess of $25,000 in connection with federal elections in 1988.

A. $25,000 in PAC contributions made by Mr. Kravis were to entities that he believed not to be federal committees.

As set forth in his Affidavit, Mr.Kravis had no idea that his contributions to the New York Republican County Committee, the New Jersey Governor's Ball, the Presidential Trust, and the Fund for America's Future were to federal political committees.[2] Although all of these entities apparently have both federal and non-federal accounts, Mr. Kravis was unaware of this at the time he contributed and did not intend that these contributions be used in connection with federal elections. The fact that these committees deposited his contributions erroneously in a federal account should not result in a finding that Mr. Kravis violated the Act.

B. $16,250 of Mr. Kravis' individual contributions to candidates for 1988 elections were made in 1987.

In addition to the contributions outlined above that Mr. Kravis did not believe pertained to federal elections, $16,250 for the contributions he made to candidates for 1988 elections were actually made during calendar year 1987. As the Commission has acknowledged, it is not unusual for individual contributors to believe that these contributions count toward their annual limit for the year in which these contributions are made, and not for the year of the

---

[2] Mr. Kravis' belief that his contributions to these entities were non-federal was entirely reasonable. In fact, it is unusual for county party committees to have registered federal committees. Ordinarily, the presumption would be that a contribution to a county party committee would be for local and not federal purposes. Similarly, the New Jersey Governor's Ball neither sounds like nor would appear to be a federal political committee.

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election. In his Affidavit, Mr. Kravis stated that at the time he made these contributions he was unaware that they would count toward his 1988 limit.

Thus, in light of his belief that $25,000 of his contributions were not even made in connection with federal elections and the fact that $16,250 of his candidate contributions were made in 1987, it is understandable that Mr. Kravis did not believe that he had exceeded his $25,000 annual limit.

II. Mr. Kravis' contributions to Senator Heinz and Wilson were permissible, if properly attribute by the Committees.

As described in his Affidavit and supported by the documentation submitted by Mr. Kravis to the Commission, both the Heinz and Wilson contributions were permissible had they been properly attributed by the respective committees. Mr. Kravis intended that his May 2, 1988 $1,000 contribution to People for John Heinz be attributed to the primary election. His subsequent $1,000 contribution on May 20, 1988 was for the general election. While these contributions were permissible had the Committee properly designated them, the Heinz campaign refunded $1,000 to Mr. Kravis in October 1988, prior to the date of the election, two years before the FEC notification in this matter and for years ago.

A similar administrative Committee error led to the mistake with regard to the contributions to California for Pete Wilson. On November 27, 1987 Mr. Kravis contributed $2,000 to the Wilson champaign, $1,000 for the primarily and $1,000 for the general election. A second check for 1,000 dated May 26, 1988 and reportedly received by the Committee on September 19, 1988 should have been reattributed to Mr. Kravis' spouse. Instead the Committee reattributed part of the 1987 contribution to his spouse. Thus, the reattribution, had

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it been correctly reflected, was made in a timely fashion and there was no excessive contribution.[3]

In summary, neither of these contributions should be treated as excessive contributions under 2 U.S.C. §441a(a) (1).

CONCLUSION

For the reasons set forth above, the Commission should find no probable cause to believe that Mr. Kravis violated 2 U.S.C. §§441a(a) (1), or alternatively close the file in this matter with no further action.

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[3] $1,000 was ultimately refunded by the Wilson campaign in September 1990.

BEFORE THE FEDERAL ELECTIONS COMMISSION

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
92 AUG -4 PM 4:12

In the Matter of	)	
	)	MUR 3104
Henry Kravis	)	

AFFIDAVIT OF HENRY KRAVIS

I, Henry Kravis, being duly sworn, state as follows:

1. I am making this statement in regard to FEC matter MUR 3104 in which the Commission contends that I exceeded my 1988 annual contribution limit and made two excessive contributions to individual candidates.

2. I did not intend to violate any provision of the Federal Election Campaign Act. To the best of my knowledge at the time, the contributions I made in 1988 did not exceed this limit.

3. As soon as I was aware that some of the contributions I believed were to non-federal entities were deposited in federal accounts, I requested redesignations and refunds of those contributions. Similarly, when it came to my attention that contributions I made to individual candidates may not have been properly attributed by those candidates to the correct election or reattributed to my spouse, I requested refunds or reattributions of these contributions. All refunds and redesignations were requested voluntarily by me on my own motion prior to receipt of any notification from the FEC regarding this matter.

3. $25,000 of the contributions at issue in MUR 3104 made during 1988 were contributed to committees which I believed to be non-federal committees or non-federal accounts. These contributions were to the New York Republican County Committee, the New Jersey Governor's Ball, the Presidential Trust and the Fund for America's Future. I had no idea that the New York Republican County Committee or the New Jersey Governor's Ball accepted funds to be used in any way on behalf of federal campaigns. As to the Presidential Trust and the Fund for America's Future, I believed and intended that my contributions were to be deposited in a non-federal account for non-federal use. I did not intend that any of these funds be used in connection with federal elections.

4. On May 2, 1988 I made a contribution to People for John Heinz in the amount of $1,000. I intended that this contribution be designated for the Senator's 1988 primary election campaign. On May 20, 1988 I made a second contribution to People for John Heinz in the amount of $1,000. I intended that this contribution be designated for the Senator's 1988 general election campaign.

5. On November 24, 1987 I contributed $2,000 to the Pete Wilson Committee, $1,000 for the Senator's primary campaign and $1,000 for the Senator's general election campaign. On May 26, 1988 I wrote an additional check to the campaign in the amount of $1,000. This check should have been reattributed by the Wilson campaign to my spouse, Carolyne Roehm.

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6. Of the contributions I made to federal candidates related to the 1988 election, $16,250 of these contributions were actually made during calendar year 1987. At the time these contributions were made, I was unaware that contributions made to candidates count toward the annual limit for the year of the election and not the year in which the contributions were made.

7. Once it was brought to my attention that I may have unknowingly exceeded my 1988 annual limit, I took immediate steps to remedy the situation prior to any action by the FEC. In total, $36,000 of these contributions were redesignated or refunded to me during 1990, thus bringing my total contributions related to the 1988 election and calendar year to $23,961.

Henry Kravis

State of New York)
) SS
County of NEW YORK)

I, LESLEY V. HARRISON, a Notary Public, hereby certify that on the 31ST day of JULY, 1992, there personally appeared before me Henry Kravis, who acknowledged signing the foregoing document and that the statements contained therein are true.

Lesley V. Harrison
Notary Public

LESLEY V. HARRISON
Notary Public, State of New York
No. 31-4720901
Qualified in New York County
Commission Expires April 30, 1994

My Commission expires _____, 19___.

9304093433345

SKADDEN, ARPS, SLATE, MEAGHER & FLOM
1440 NEW YORK AVENUE, N.W.
WASHINGTON, D.C. 20005-2107
(202) 371-7000

FAX: (202) 393-5760
DIRECT DIAL
(202) 371-

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COMMISSION
ADMINISTRATIVE DIVISION
Aug 7 5 11 PM '92

August 7, 1992

BY HAND

Lawrence M. Noble, Esq.
General Counsel
Federal Election Commission
999 E Street, Northwest
Washington, D.C. 20463

Re: MUR 3104
Ronald O. Perelman

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
92 AUG 10 PM 3:20

9304093446

Dear Mr. Noble:

This letter is in response to the General Counsel's recommendation that the Federal Election Commission ("Commission") find probable cause to believe that Ronald O. Perelman ("Respondent") violated 2 U.S.C. §§ 441a(a)(3) and 441a(a)(1)(A). The Respondent has argued throughout this proceeding that he did not violate the law and that even if the Commission finds that an unintentional technical violation has occurred, the case does not warrant further pursuit.

The probable cause stage of the proceeding gives the Commission an opportunity to view this case not in the context of an initial finding of reason to believe, but under the Federal Election Campaign Act's highest threshold for determining whether a violation has occurred and whether, in the Commission's discretion, the case should be pursued. This response demonstrates that the Commission should not proceed against Respondent.

I. 1988 Annual Contribution Limit

A. The Presidential Trust Contribution

The alleged violation of section 441a(a)(3) is largely based on a $5,000 contribution that the Respondent made to The Presidential Trust, a fundraising project name for a Republican National Committee ("RNC") event held in New York City. Every Spring since 1986,

the Respondent's Special Counsel, Richard E. Halperin, authorized contributions, on behalf of the Respondent or a corporation solely owned by Respondent, to the Republican Party's President's Dinner. In Spring 1988, a $5,000 contribution was made to The Presidential Trust, a federal account, instead of as in previous years, to the non-federal account of The President's Dinner. As the sworn testimony demonstrates, the non-descriptive project name, The Presidential Trust, confused Halperin. The Presidential Trust contribution was intended for and was believed to be going to a non-federal account. (Attachment I - Affidavit of Richard E. Halperin). The confusion caused by the use of the project name is confirmed by the letter from the RNC's Chief Counsel. (Attachment II - Affidavit of Benjamin Ginsberg). The RNC's counsel stated that the Republican Party encompasses three national party committees and those committees conduct fundraising projects for federal and non-federal accounts, with the head of the party, the President, in the name of the fundraising projects. The RNC's counsel further acknowledged that, despite the existence of disclaimers on the fundraising literature, the similarities of the names of the federal and non-federal projects could confuse contributors and was the apparent cause of the confusion in this case. As soon as Halperin realized that The Presidential Trust contribution had been deposited in a federal account instead of a non-federal account, he obtained a refund on behalf of Respondent and made a new contribution, consistent with his initial intent, to the RNC's non-federal account.

The General Counsel's brief ignores this confusion because The Presidential Trust material carried a disclaimer in small print stating that it was a project of a federal account. The Commission, however, in its recent proposed rulemaking concerning project names, recognized that the mere existence of a disclaimer on fundraising materials is insufficient to avoid confusing the contributor when the project name used in fundraising is ambiguous. See 57 Fed. Reg. 31,424 (1992) (to be codified 11 C.F.R. § 102.14). There is no doubt that the name "The Presidential Trust" confused the contributor and the confusion is understandable in view of the similarity of project names used by the RNC and the circumstances surrounding this particular contribution. For

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all these reasons, the Commission should not count The Presidential Trust contribution against the Respondent's 1988 annual limit.

B. Bill Green for Congress

On March 6, 1987, a $1,000 contribution was made to the Committee for Congressman Bill Green ("Green Committee"). The purpose of the contribution was to join what Congressman Green calls his Congressional Club, again a project name used for raising funds for Congressman Green's campaign. The contribution check states "renewal for membership in club." Although the Respondent made contributions to the Green Committee on February 11, 1987, and March 6, 1987, and the Green Committee applied both contributions toward 1986 debt retirement, the General Counsel has treated only the February contribution as a 1986 contribution. (Attachment III - Green Committee 1987 FEC report showing debt designation of Respondent's contribution and the Green Committee's debt schedule showing a $237,000 debt). Indeed, the FEC public record shows both contributions as being made "For 1986." (Attachment IV - FEC computer schedules showing both contributions to the Green Committee as 1986 debt contributions). Moreover, when the Green Committee accepted the March contribution from the Respondent, it had sufficient outstanding debt to apply the Respondent's contribution to the 1986 campaign deficit. For this reason alone, the Commission should not count the March 1987 contribution to the Green Committee against the Respondent's 1988 annual limit.

There is yet another basis not to charge the Respondent's 1988 limit with the March 1988 Green Committee contribution: at the time of this contribution, the FEC's regulations concerning post-general election contributions were ambiguous. When the Green Committee accepted the Respondent's March 1987 contribution, the Commission's regulations did not address the handling of post-general election contributions in the way it addressed post-primary contributions. With regard to contributions received after the primary election but before the general election, the former regulations at 11 C.F.R. § 110.1(a)(2)(i) stated that such contributions must be designated by the contributor in writing in order to

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count the contribution toward the limit for the primary election that had just occurred. Otherwise, the contribution would be applied to the general election. There was no similar regulation with respect to contributions received after the general election. In fact, the former regulations did not require a contribution received after the general election to be designated in writing by the contributor for the preceding election. Under former 11 C.F.R. § 102.9(e), the recipient campaign could choose to designate the contribution to a prior campaign as long as the prior campaign had a net debt in excess of the amount of the contribution, even without the contributor's written designation.

Soon after the Respondent made the March contribution to the Green Committee, the Commission revised its regulations at 11 C.F.R. § 102.9(e) and 11 C.F.R. § 110.1(a)(2)(i). The revised regulations clarified that a recipient campaign committee may not redesignate a contribution without the contributor's written designation. The Explanation and Justification to the revised regulations for section 102.9(e) states that the purpose of the revised regulations was to correct a defect in the former regulations that allowed the recipient campaign committee to redesignate a post-general election contribution without the contributor's written designation. Thus, prior to the change in the regulations, regardless of the contributor's intent, the recipient campaign committee could designate a contribution as a contribution to a prior election as long as the campaign committee had net outstanding debt. According to the Green Committee's FEC report, the Green Committee did what the law allowed at the time and redesignated, without contributor consent, the Respondent's 1987 contributions to retire 1986 debt. Consequently, the Respondent's contribution to the Green Committee should not count against the Respondent's 1988 annual limit.

Moreover, in no case has the Commission pursued an individual contributor (as opposed to a political committee) beyond the reason to believe stage for a violation that occurred as a result of the defect in former section 102.9(e). Based on the language of the FEC's prior regulations, the FEC report showing that the Respondent's contributions were for the "'86 deficit," and

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the FEC's computer-generated schedules showing the 1987 contributions as contributions "For 1986," the Commission should not count the March 1987 contribution to the Green Committee against Respondent's 1988 calendar year limit.

C. Biden Presidential Contribution

A contribution made in 1987 to the Biden Presidential Campaign that was abandoned in 1987, should not be counted toward the Respondent's 1988 limit. The Commission, in its recent legislative recommendation to Congress, advises that Congress should modify the $25,000 individual limit so that it is calculated on a calendar year basis. See 1992 FEC Legislative Recommendations. While the Commission has not attempted to implement the calendar year interpretation pending its recommendation to Congress, at least in this extreme situation of a 1987 contribution made to a campaign that folded prior to calendar year 1988, the Commission should, in its discretion, not count this contribution toward the Respondent's 1988 limit.

This is particularly compelling when taking into consideration the ultimate fact that the Respondent contributed on a calendar year basis a total of $11,000 to federal elections in 1987 and $23,500 to federal elections in 1988.

II. Campaign Committee Contribution Limit

The General Counsel has also cited the Respondent for a violation of 2 U.S.C. § 44la(a)(1)(A) for a $2,000 contribution to The Moynihan Committee in January 1987 and failing to reattribute $1,000 of the contribution to the general election. The public record shows that $1,000 of the $2,000 contribution was attributed to the general election and The Moynihan Committee separately accounted for $1,000 of the contribution. While there is no record of a signed reattribution, the time for maintaining documents relating to the 1987 contribution expired before this case was initiated.

Moreover, there are no enforcement actions where the Commission pursued an individual contributor for making an excessive contribution of $1,000 or less

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prior to the Commission correcting the defect in former 11 C.F.R. ¶ 102.9(e). See, e.g., MURs 2543 and 2127.

III. Conclusion

The General Counsel has not even attempted to refute compelling defenses raised by the Respondent throughout this proceeding. The General Counsel's brief merely recites the law and restates the complainant's allegations as if there were no response or defense raised by the Respondent at all. In the General Counsel's apparent effort to achieve uniformity with the other respondents in this case, the General Counsel has taken an inflexible and unresponsive approach to the Respondent's unique arguments throughout this proceeding.

The Respondent respectfully submits that the Commission find no probable cause to believe a violation occurred, or in the alternative, find probable cause to believe a violation occurred and take no further action.

Respectfully submitted,

Kenneth A. Gross

Attachments

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RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
92 AUG 10 PM 3:20

Attachment I

Affidavit of Richard E. Halperin

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BEFORE THE FEDERAL ELECTION COMMISSION

STATE OF NEW YORK)
: ss.:
COUNTY OF NEW YORK)

MUR 3104

AFFIDAVIT OF RICHARD E. HALPERIN

Richard E. Halperin, being duly sworn, deposes and says, that

1. I am Senior Vice President of MacAndrews & Forbes Group Incorporated, and Special Counsel to Ronald O. Perelman, Chairman of MacAndrews & Forbes Group Incorporated. I have been in this position since February 1984. From September 1979 to January 1984, I served as Administrative Assistant to the Attorney General of New York State and as an Assistant Attorney General in the Executive Bureau.

2. As Senior Vice President and Special Counsel to the Chairman of MacAndrews & Forbes Group Incorporated, I have broad responsibilities involving the interests of Mr. Perelman, individually, MacAndrews and Forbes Group Incorporated, and its subsidiaries. For example, I chair charitable foundations funded by Mr. Perelman and the corporations, I am responsible for the real estate holdings of Mr. Perelman and the corporations, and although a small part of my overall duties, I am solely

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responsible for responding to solicitations for political contributions addressed to Ronald O. Perelman, individually, MacAndrews & Forbes Group Incorporated, and its subsidiaries. It is my responsibility to decide whether to contribute, how much to contribute, and from what source, i.e., Ronald Perelman's personal funds or corporate funds.

3. Every Spring, beginning in 1986, I have authorized contributions, on behalf of Ronald O. Perelman, to the Republican National Committee ("RNC") Presidential Dinner. In the Spring of 1988, however, a contribution I thought was the annual contribution to the RNC Presidential dinner was, in fact, a contribution to the Presidential Trust, which was featured as a dinner with then Vice-President and Mrs. George Bush.

4. Prior to 1988, contributions made to the Presidential Dinner were made either to the RNC's Building Fund or an account that accepted other than federal funds. In fact, upon review of our records, I authorized the 1986 and 1987 contributions to the Presidential Dinner, on Mr. Perelman's behalf, from corporate funds. The RNC apparently deposited those contributions in accounts that permitted the use of corporate funds.

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5. In 1988, the solicitation for the Presidential Trust requested that the contribution be made from individual funds, not corporate funds. That did not indicate to me that the contribution would count against Mr. Perelman's annual federal contribution limit because I had recalled receiving a Democratic National Committee ("DNC") solicitation that requested individual funds even though the contribution was for a non-federal account. As was the case with the DNC, I believed that the RNC was requesting non-federal contributions from non-corporate sources in the presidential election year.

Richard E. Halperin

Sworn to and Subscribed before me
this 25th day of September, 1990.

KAREN A. DeMECO
Notary Public, State of New York
No. 41-4699582
Qualified in Queens County
Commission Expires March 30, 19 91

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Attachment II

Affidavit of Benjamin Ginsberg

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Republican
National
Committee

Benjamin L. Ginsberg
Chief Counsel

Michael A. Hess
Janice P. Lacy
Deputy Chief Counsels

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March 6, 1992

Mr. Kenneth A. Gross, Esq.
Skadden, Arps, Slate, Meagher & Flom
1440 New York Avenue, Northwest
Washington, DC 20005-2107

Dear Mr. Gross:

We understand that in 1988, Ronald O. Perelman made a $5,000 contribution to The President's Trust; an account established by the Republican National Committee ("RNC") that accepted proceeds for a Republican Party function held in New York City. We understand that Mr. Perelman was advised by someone unconnected with the Republican National Committee, or any other Republican entity, that The President's Trust was a non-federal political committee. Although Mr. Perelman intended the contribution to be deposited into a non-federal account, the RNC deposited Mr. Perelman's contribution into its federal account because The President's Trust was actually a federal account.

You have also informed us that at approximately the same time as the RNC solicited funds for The President's Trust, the National Republican Senatorial Committee and the National Republican Congressional Committee, committees unaffiliated with the RNC, solicited Mr. Perelman for an event called The President's Dinner, which accepted funds for a non-federal account.

The Republican Party encompasses three national party committees with the similarity of "Republican" in the committee names. These committees occasionally conduct fundraising programs for federal and non-federal accounts with the head of the party, the President, and so use his title in their fundraising projects. Although the RNC solicitations for contributions contain the disclaimers required under the law, a contributor unfamiliar with the intricacies of party committees and fundraising projects could confuse these committees and accounts. It is also possible that there could have

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Telex: 701144 • FAX: (202) 863-8820

been some confusion over Mr. Perelman's contribution because The President's Trust fundraiser was a state event held in New York.

According to counsel, Mr. Perelman's lack of familiarity with project names sponsored by the various Republican committees resulted in Mr. Perelman making a contribution to a federal account when he intended to make a contribution to a non-federal account. While we regret that the similarity of the project names was the apparent basis for this misunderstanding, the simple fact remains that misunderstandings of this type still occasionally arise.

Please let us know if you need additional information.

Sincerely,

Benjamin L. Ginsberg

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Attachment III

Green Committee 1987 FEC Report

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FEC140046
BRUCE ROSENBLATT
COMMITTEE FOR CONGRESSMAN BILL GREEN
501 FIFTH AVENUE SUITE 1814
NEW YORK NY 10017

4. TYPE OF REPORT

- [ ] April 15 Quarterly Report
- [ ] July 15 Quarterly Report
- [ ] October 15 Quarterly Report
- [ ] January 31 Year End Report
- [ ] July 31 Mid-Year Report (Non-election Year Only)
- [ ] Twelfth day report preceding _____ election on _____ in the State of _____
- [ ] Thirtieth day report following the General Election on _____ in the State of _____
- [ ] Termination Report

This report contains activity for:
- [X] Primary Election
- [ ] General Election
- [ ] Special Election
- [ ] Runoff Election

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
92 AUG 10 PM 3:

SUMMARY

	COLUMN A	COLUMN B
5. Covering Period 1/1/92 through 6/30/92		
6. Net Contributions (other than loans)		
(a) Total Contributions (other than loans) (from Line 11(a))	132,150.91	132,150.91
(b) Total Contribution Refunds (from Line 11(b))	1,925.00	1,925.00
(c) Net Contributions (other than loans) (subtract Line 6(b) from 6(a))	130,225.91	130,225.91
7. Net Operating Expenditures		
(a) Total Operating Expenditures (from Line 19)	52,139.89	52,139.89
(b) Total Offsets to Operating Expenditures (from Line 14)	2,447.37	2,447.37
(c) Net Operating Expenditures (subtract Line 7(b) from 7(a))	49,692.52	49,692.52
8. Cash on Hand at Close of Reporting Period (from Line 8(f))	92,201.12	
9. Debts and Obligations Owed To Committee (Itemize all on Schedule C)		
10. Debts and Obligations Owed By Committee (Itemize all on Schedule D)		

For Further Information contact: Federal Election Commission, 999 E Street, NW, Washington, DC 20463, Toll Free 800-424-9530, Local 202-376-3120

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Signature of Treasurer: Bruce Rosenblatt

Date: 7/31/92

NOTE: Submission of false, incomplete or misleading information may subject treasurer signing this Report to the penalties of 2 U.S.C. 437g.

FILING FEC
Office Use Only

[redacted]

Name of Committee (in full)

Committee [redacted]

I. RECEIPTS

11. Contributions (other than loans) from:		
(a) Individuals/Persons Other Than Political Committees		
(i) Itemized (see Schedule A)	[redacted]	
(ii) Unitemized	[redacted]	
(iii) Total of contributions from Individuals	[redacted]	[redacted]
(b) Political Party Committees		
(c) Other Political Committees (such as PACs)	[redacted]	[redacted]
(d) The Candidate		
(e) TOTAL CONTRIBUTIONS (other than loans)	[redacted]	[redacted]
12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES		
13. Loans:		
(a) Made or Guaranteed by the Candidate		
(b) All Other Loans		
(c) TOTAL LOANS		
14. OFFSETS TO OPERATING EXPENDITURES		[redacted]
15. OTHER RECEIPTS		[redacted]
16. TOTAL RECEIPTS		[redacted]

II. [redacted]

17. OPERATING EXPENDITURES	[redacted]	
18. TRANSFERS TO OTHER AUTHORIZED [redacted]		
19. LOAN REPAYMENTS:		
(a) Of Loans Made or Guaranteed by the Candidate		
(b) Of All Other Loans		
(c) TOTAL LOAN REPAYMENTS		
20. REFUNDS OF CONTRIBUTIONS		
(a) Individuals/Persons Other Than Political Committees	[redacted]	[redacted]
(b) Political Party Committees		
(c) Other Political Committees		
(d) TOTAL CONTRIBUTIONS	[redacted]	[redacted]
21 OTHER DISBURSEMENTS		
22 TOTAL DISBURSEMENTS	[redacted]	[redacted]

III. [redacted]

23. CASH ON HAND AT [redacted]	[redacted]
24. TOTAL RECEIPTS THIS PERIOD	[redacted]
25. SUBTOTAL	[redacted]
26. TOTAL DISBURSEMENTS THIS PERIOD	[redacted]
27 CASH ON HAND AT CLOSE OF THIS [redacted]	[redacted]

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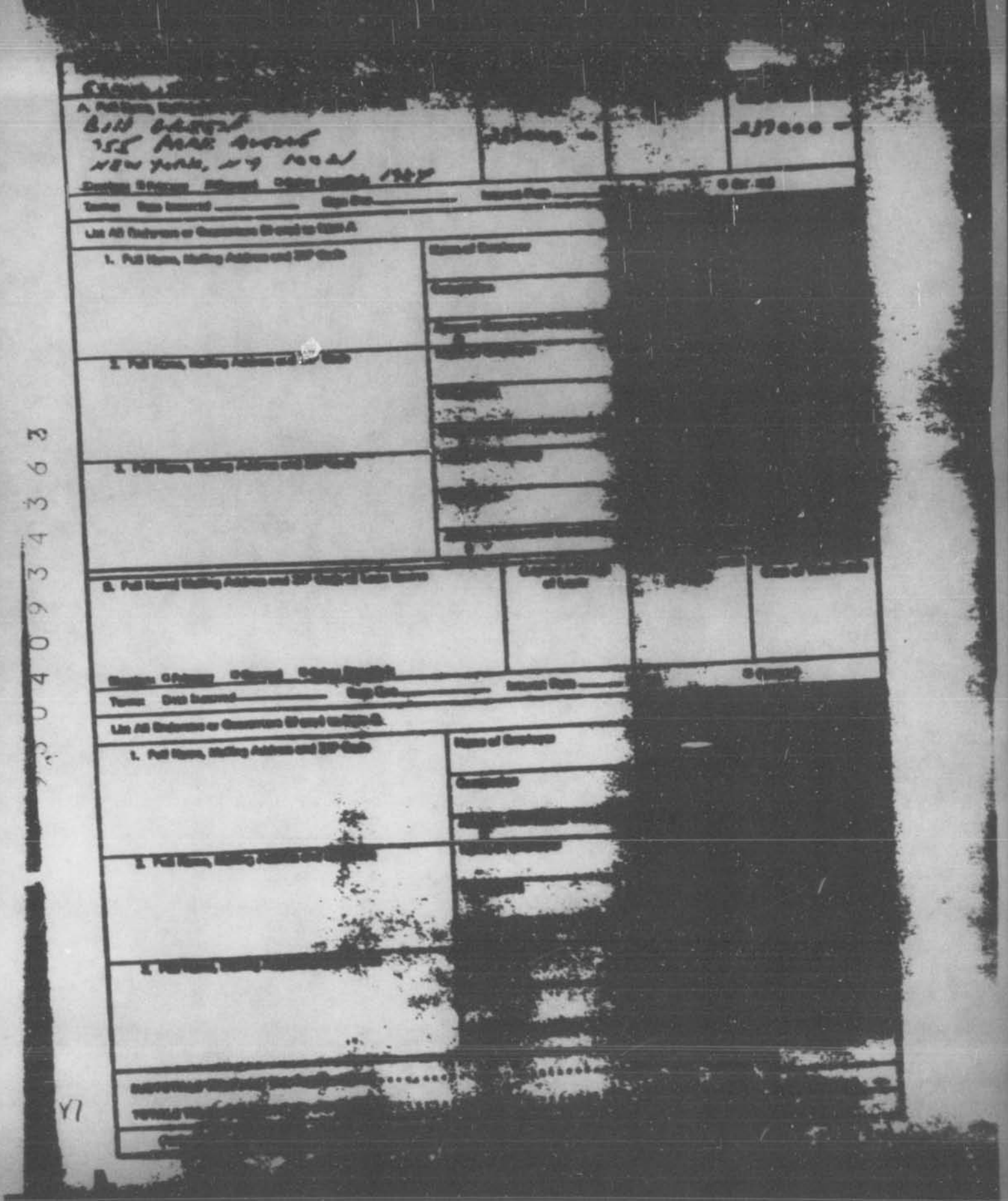
SCHEDULE A

Any information [illegible]

NAME OF COMMITTEE (In Full)

COMMITTEE FOR CONGRESSMAN BILL GREEN

A. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation	Date Received (Mo., Day, Yr.)	Amount of Each Receipt this Period
Joseph D. Rinto 815 Park Avenue New York City 10021	self employed Accountant and Auditor	2/6/87	250
Receipt For: ☐ Primary ☐ General ☑ Other (specify): 86 Deficit	Aggregate Year-to-Date > $250		
B. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation	Date Received (Mo., Day, Yr.)	Amount of Each Receipt this Period
Ronald O. Perelman 36 East 63rd St and New York, N.Y. 10021	MacAndrews & Forbes Group Chairman	2/13/87 3/4/87	4,000 1,000
Receipt For: ☑ Primary ☐ General ☑ Other (specify): 86 Deficit	Aggregate Year-to-Date > $5,000		
C. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation	Date Received (Mo., Day, Yr.)	Amount of Each Receipt this Period
Roswell B. Perkins 1120 Fifth Ave. New York City 10128	Debevoise Plimpton Attorney	6/1/87	250
Receipt For: ☑ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date > $250		
D. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation	Date Received (Mo., Day, Yr.)	Amount of Each Receipt this Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date >		
E. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation	Date Received (Mo., Day, Yr.)	Amount of Each Receipt this Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date >		
F. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation	Date Received (Mo., Day, Yr.)	Amount of Each Receipt this Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date >		
G. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation	Date Received (Mo., Day, Yr.)	Amount of Each Receipt this Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date >		
SUBTOTAL of Receipts This Page (optional)			
TOTAL This Period (last page only)			



Attachment IV

FEC Computer Schedules

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CONTRIBUTOR/LENDER/TRANSFERER OCCUPATION/EMPLOYER ALLOCATION LOCATION	STREET ADDRESS	CITY	STATE ZIP REPORT TYPE	TYPE OF SALE ELECTION DATE	AMOUNT
FEKELMAN, RONALD FLORIDA COMMITTEE INC 07SEN/008/3442 $137767 CONTRIBUTION		NEW YORK REVLON	NY 10021 MID-YEAR REPORT	PRIMARY 29JAN87	[illegible]
FEKELMAN, RONALD [illegible] 07SEN/[illegible] $137763 CONTRIBUTION		NEW YORK REVLON	NY 10021 MID-YEAR REPORT	GENERAL 29JAN87	[illegible]
FEKELMAN, RONALD [illegible] COMMITTEE 07SEN/[illegible] $137143 CONTRIBUTION		NEW YORK [illegible]	NY 10021 MID-YEAR REPORT	PRIMARY 7APR87	[illegible]
FEKELMAN, RONALD COMMITTEE FOR BAD GIBBONS 08HSEL/[illegible] $171234 CONTRIBUTION		[illegible] CONSOLIDATED [illegible]	[illegible] [illegible] REPORT	PRIMARY 17AUG87	4,000
FEKELMAN, RONALD D REFELMAN FOR SENATE- 88 07SEN/[illegible] $142963 CONTRIBUTION		NEW YORK	[illegible] MID-YEAR REPORT	PRIMARY 16JUN87	1,000
FEKELMAN, RONALD D COMMITTEE FOR CONGRESSMAN BILL GREEN 07HSEL/[illegible] $151180 CONTRIBUTION		NEW [illegible] MAC ANDREWS & FORBES [illegible]	[illegible] [illegible] YEAR REPORT	FOR 1986 13FEB87	1,000
FEKELMAN, RONALD D COMMITTEE FOR CONGRESSMAN BILL GREEN 07HSEL/[illegible] $151181 CONTRIBUTION		NEW YORK MAC ANDREWS & FORBES GROUP	[illegible] MID-YEAR REPORT	FOR 1986 9MAR87	1,000
FEKELMAN, RONALD D [illegible] FOR U S SENATE '90 07SEN/[illegible] $162333 CONTRIBUTION		NEW YORK REVLON GROUP	NY 10021 MID-YEAR REPORT	PRIMARY 13FEB87	1,000
FEKELMAN, RONALD D BILL BRADLEY FOR U S SENATE '90 07SEN/[illegible] $162333 CONTRIBUTION		NEW YORK REVLON GROUP	NY 10021 MID-YEAR REPORT	GENERAL 13FEB87	1,000
FEKELMAN, RONALD D FRITZ DANKER FOR SENATE 08SEN/[illegible] $320240 CONTRIBUTION		NEW YORK REVLON GROUP INC	NY 10021 APRIL QUARTERLY	PRIMARY 9FEB88	1,000
FEKELMAN, RONALD D FRITZ DANKER FOR SENATE 08SEN/[illegible] $320241 CONTRIBUTION		NEW YORK REVLON GROUP INC	NY 10021 APRIL QUARTERLY	GENERAL 9FEB88	500
FEKELMAN, RONALD D DEMOCRATIC SENATORIAL CAMPAIGN COMMITTEE 08SEN/[illegible] $344[illegible] CONTRIBUTION		NEW YORK REVLON GROUP INC	NY 10021 MAY MONTHLY	PRIMARY [illegible]	10,000

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USER SELECTED ITEMIZED TRANSACTIONS

CONTRIBUTOR/LENDER/TRANSFER NAME / REPORTING ENTITY / MICROFILM LOCATION	CITY / TRANSACTION TYPE	STATE ZIP / REPORT TYPE	TYPE OF FILER / DATE	ELECTION	AMOUNT
PERELMAN, RONALD O MCCARTHY FOR U S SENATOR 08SEN/011/1946 #427431 CONTRIBUTION	NEW YORK MAC ANDREWS & FORBES	NY 10021 JULY QUARTERLY	23MAY88	PRIMARY	1,000
PERELMAN, RONALD O LIGHT [illegible] COMMITTEE 08SEN/013/9708 #428039 CONTRIBUTION	NEW YORK MACANDREWS & FORBES	NY 10021 JULY QUARTERLY	29APR88	PRIMARY	1,000
PERELMAN, RONALD O CITIZENS FOR ARLEN SPECTER 08SEN/013/3214 #462301 CONTRIBUTION	NEW YORK MACANDREW & [illegible]	NY 10021 MID-YEAR REPORT	16MAY88	PRIMARY	1,000
PERELMAN, RONALD O DUKAKIS FOR PRESIDENT COMMITTEE COMPLIANCE FUND 08PE[illegible]15 #683458 CONTRIBUTION	NEW YORK REVLON INC	NY 10021 YEAR-END	8DEC88	GENERAL	1,000
PERELMAN, RONALD O DUKAKIS FOR PRESIDENT COMMITTEE COMPLIANCE FUND 08PEC/[illegible]2968 #704801 CONTRIBUTION	NEW YORK REVLON INC	NY 10021 COMP ADJUST AMEND	8DEC88	GENERAL	1,000
PERELMAN, RONALD O DUKAKIS FOR PRESIDENT COMMITTEE, INC 08PE[illegible]2776 #705008 CONTRIBUTION	NEW [illegible] REVLON [illegible]	NY 10021 COMP ADJUST AMEND	8DEC88	PRIMARY	1,000
PERELMAN, RONALD O MR BIDEN FOR PRESIDENT 08FEC/[illegible]736 #044844 CONTRIBUTION	NEW [illegible] MACANDREWS [illegible] GRP INC	[illegible] QUARTERLY	25JUN87	PRIMARY	1,000
PERELMAN, RONALD O MR FRIENDS OF GARY HART-1988 INC 08FEC/[illegible]317 #059253 CONTRIBUTION	NEW YORK	NY 10021 JULY QUARTERLY	6MAY87	PRIMARY	1,000
PERELMAN, RONALD O MR GEORGE BUSH FOR PRESIDENT, INC 08FEC/[illegible]507 #186111 CONTRIBUTION	NEW YORK	NY 10021 YEAR-END	27OCT87	PRIMARY	500
PERELMAN, RONALD O MR GEPHARDT FOR PRESIDENT COMMITTEE INC 08FEC/[illegible]336 #184431 CONTRIBUTION	NEW YORK	NY 10021 YEAR-END	2NOV87	PRIMARY	1,000
PERELMAN, RONALD O MR DOLE FOR PRESIDENT COMMITTEE INC 08FEC/[illegible]087 #194634 CONTRIBUTION	NEW YORK	NY 10021 YEAR-END	20NOV87	PRIMARY	500
PERELMAN, RONALD O MR ALBERT GORE JR FOR PRESIDENT COMMITTEE INC 08FEC/[illegible]765 #344243 CONTRIBUTION	NEW YORK	NY 10021 MAY MONTHLY	23APR88	PRIMARY	1,000

NOTICE THE DOCUMENTS LISTED ABOVE ARE AVAILABLE FOR PUBLIC INSPECTION AND COPYING AT THE FEC. ANY INFORMATION COPIED FROM SUCH REPORTS OR STATEMENTS MAY NOT BE SOLD OR USED BY ANY PERSON FOR THE PURPOSE OF SOLICITING CONTRIBUTIONS OR FOR COMMERCIAL PURPOSES, OTHER THAN USING THE NAME AND ADDRESS OF ANY POLITICAL COMMITTEE TO SOLICIT CONTRIBUTIONS FROM SUCH COMMITTEE." 2 U.S.C. §438(a)(4).

CONTRIBUTOR/LENDER/TRANSFERRER REPORTING ENTITY MICROFILM LOCATION	STREET ADDRESS TRANSACTION TYPE	CITY	STATE ZIP	TYPE OF FILER REPORT TYPE DATE	ELECTION	AMOUNT
PERELMAN, RONALD O MR REPUBLICAN NATIONAL COMMITTEE - CONTRIBUTIONS (AKA REPUBLICAN NATIONAL FINANCE COMMITTEE 88FEC/534/4042 0402800 CONTRIBUTION		NEW YORK CITY MACANDREWS & FORBES	NY 10153	JULY QUARTERLY 30JUN88	PRIMARY	5,000
PERELMAN, RONALD O MR CALIFORNIANS FOR PETE WILSON 1994 88SEN/011/1157 0417463 CONTRIBUTION		[illegible]	NY 10021	JULY QUARTERLY 27JUN88	GENERAL	[illegible],000
PERELMAN, RONALD O MR RIEGLE FOR SENATE IN '88 COMMITTEE 88SEN/012/3285 0420685 CONTRIBUTION		[illegible]	[illegible]10021	[illegible]ULY QUARTERLY 9MAY88	PRIMARY	[illegible],000

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BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

In the Matter of	)	
	)	
Donald J. Trump	)	MUR 3104
Dwayne O. Andreas	)	
Dorothy Inez Andreas	)	
Ronald O. Perelman	)	
Henry Kravis	)	

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GENERAL COUNSEL'S REPORT

I. BACKGROUND

The Commission found reason to believe that Donald J. Trump, Dwayne O. Andreas, Dorothy Inez Andreas, Ronald O. Perelman and Henry Kravis each violated 2 U.S.C. § 441a(a)(3) by making aggregate 1988 contributions in excess of that statute's $25,000 annual limit. Additionally, the Commission found reason to believe that Ronald O. Perelman and Henry Kravis each violated 2 U.S.C. § 441a(a)(1)(A) by making excessive contributions to candidate committees. The respondents all responded to the Commission's findings and to discovery requests. After investigation, including a thorough review of all materials submitted by Respondent Trump, this Office prepared a brief recommending that the Commission find probable cause to believe that Mr. Donald J. Trump violated Section 441a(a)(3). The Commission, at the requests of Respondents Dwayne O. Andreas, Dorothy Inez Andreas, Ronald O. Perelman and Henry Kravis, entered into preprobable cause conciliation, but attempts to negotiate mutually acceptable agreements with these Respondents failed. Accordingly, the General Counsel prepared briefs, which are incorporated herein by reference, with respect to these

latter Respondents. Reply briefs have been submitted on behalf of these remaining Respondents and the arguments raised therein are discussed below.

II. ANALYSIS

A. Donald J. Trump

Mr. Trump argues that the Commission should take no further action against him for three reasons. See Attachment 1, pages 1 - 35. First, Mr. Trump argues that imposition of a civil penalty in this case would be contrary to Commission precedent. Second, he argues that action against him would constitute selective prosecution in violation of his constitutional right to equal protection of the laws. Finally, he argues that he should not be penalized for the mistake of his original counsel in misreading the statute. None of these arguments has merit.

Mr. Trump does not dispute that the Commission has imposed civil penalties against respondents for violating Section 441a(a)(3), or that he exceeded the limit therein. Rather, citing MURs 1526, 1893 and 2167, Mr. Trump argues that "the existence of voluntary and expeditious action, before a compliance file has been opened, has led uniformly to decisions to take no further action." Id. at 6. Mr. Trump misreads these precedents. In all of the MURs cited, the voluntary and expeditious action that the Commission found mitigating was the sua sponte initiation of the proceeding by the respondent. Moreover, the respondents in MURs 1526, 1893 and 2167 promptly obtained refunds of

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their excessive contributions, which in all three cases amounted to less than $10,000. By contrast, this matter was generated not by Mr. Trump but by the Commission itself and the remedial action taken by Mr. Trump was neither complete nor timely. Mr. Trump has obtained refunds of little more than half of his $47,050 in excessive contributions, and even these were not obtained until after the Los Angeles Times published an article questioning whether Mr. Trump had exceeded the annual limit, some nine to eleven months after Mr. Trump made the contributions.

Mr. Trump suggests this matter has not yet been concluded because the Commission "intentionally pigeon-hole[d]" the matter until it could penalize Mr. Trump, a person with "a nationally-recognized name", during an election year in an attempt to publicize both the $25,000 annual limit and the consequences of violating it. Mr. Trump asserts this alleged plan violates his rights to equal protection and due process. Id. at 3. Mr. Trump appears to be asserting a claim of selective prosecution, which, as shown below, is totally lacking in merit.

Allegations of selective prosecution must be evaluated according to "ordinary equal protection standards," which require Mr. Trump to show not only that the proceeding against him is discriminatory, but that the discrimination is intentional. Wayte v. United States, 470 U.S. 598, 608 (1985); accord, Attorney Gen. of United States v. Irish People, Inc., 796 F.2d 520, 525 (D.C. Cir. 1986); FEC v.

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Nat'l Conservative Political Action Comm., No. 85-2898, mem. op. at 9 (D.D.C. Apr. 29, 1987) ("NCPAC"). To establish such a claim in this case, Mr. Trump has a particularly heavy burden, for he must present enough evidence to overcome the presumption that Federal agencies such as the Commission act from proper motives. Schweiker v. McClure, 456 U.S. 188, 195 (1982); Withrow v. Larkin, 421 U.S. 35, 47 (1975). Mr. Trump in fact fails to carry his evidentiary burden on either prong of the test. The closest Mr. Trump comes to even alleging, much less proving, a discriminatory effect is an argument that he should be treated similarly to respondents in MURs 1526, 1893 and 2167. But as discussed above, those cases are clearly distinguishable from this one. Similarly, Mr. Trump is unable to show a discriminatory purpose behind this proceeding. At best, Mr. Trump relies on mere "[c]onjecture, speculation and suspicion about [the Commission's] motive[s]," which are insufficient to support an allegation of selective prosecution. NCPAC, mem. op. at 10.

Finally, Mr. Trump argues that he should not be penalized for his original counsel's failure to advise him that, pursuant to the second sentence of 2 U.S.C. § 441a(a)(3), any contribution made to a federal candidate in a non-election year will be considered to be made during the calendar year in which such election is held. However, as the Court of Appeals for the District of Columbia Circuit has noted, "[e]veryone in our society bears the risk of getting bad legal advice." Ayuda, Inc. v. Thornburgh, 948 F.2d 742,

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756 (D.C. Cir. 1991). Inaccurate legal advice does not vitiate the violation and does not warrant a finding of no further action.

Therefore, based on the evidence of excessive contributions made by Mr. Trump, the Office of the General Counsel recommends that the Commission deny Respondent's request to take no further action in this matter. This Office also recommends that the Commission find probable cause to believe that Donald J. Trump violated 2 U.S.C. § 441a(a)(3).

B. Dwayne O. and Dorothy Inez Andreas

In their reply brief, Respondents do not dispute that they violated 2 U.S.C. § 441a(a)(3). See Attachment 1, pages 36 - 41. Instead, Respondents purportedly challenge the sufficiency of the General Counsel's Brief on the grounds that it does not address what they perceive as "the critical issues preventing resolution of this matter." Id. at 36. Those "critical issues" consist of the legal arguments and factual assertions advanced by counsel but rejected by the Commission throughout the course of this enforcement matter.

In particular, Mr. Andreas again disputes responsibility for exceeding the limit because of alleged confusion surrounding the application of the $25,000 annual limit statutory provision, which he contends the FEC acknowledged in revising its regulations at Part 110. In addition, counsel reiterates that Mrs. Andreas relied upon her husband, contending that that reliance was justifiable and

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unavoidable. The Commission has previously considered these arguments and the General Counsel's response to them and has found that they do not vitiate the violations at issue

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Although the circumstances outlined by counsel may be mitigating, they do not vitiate the violations nor do they warrant taking no further action. Given the evidence of excessive contributions admittedly made by the Respondents, the Office of the General Counsel recommends that the Commission deny counsel's request that the General Counsel rebrief this matter. This Office also recommends that the Commission find probable cause to believe that Dwayne O. Andreas and Dorothy Inez Andreas each violated 2 U.S.C. § 441a(a)(3).

C. Ronald O. Perelman

In Respondent Perelman's reply brief, counsel again focuses on three contributions which he maintains should not be included in Mr. Perelman's 1988 annual limit: a $1,000 contribution to Bill Green; a $5,000 contribution to the Presidential Trust of the Republican National Committee and; a $2,000 contribution to Patrick Moynihan. See Attachment 1, pages 42 - 63. Counsel previously raised many of these same arguments and the Commission has rejected them. See General Counsel's Reports, dated September 17, 1991, April 15, 1992, and June 18, 1992. Accordingly, to the extent possible, we confine our discussion here to the only new argument raised

in Respondent Perelman's reply brief.[1]

Respondent reiterates his earlier contention that he misunderstood the RNC contribution to be a nonfederal contribution and that he now has obtained a refund of it. Counsel argues that although the solicitation materials clearly stated that contributions to the Presidential Trust would be deposited into a federal account, the confusion was attributable to the "non-descriptive project name" and the similarities of the names of federal and nonfederal [RNC Fundraising] projects. See Attachment 1 at 42 - 44. Counsel then points to the Commission's recent proposed rulemaking on project names to suggest that such statements identifying the solicitation for a federal account are insufficient to eliminate contributor confusion, and concludes that the Commission should not count the Presidential Trust contribution against the Respondent's 1988 annual limit.

Accordingly in light of the foregoing, this Office recommends that the Commission find probable cause to believe that Ronald O. Perelman violated 2 U.S.C. §§ 441a(a)(3) and

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1. With regard to the other contested contributions, counsel essentially repeats his earlier arguments. For example, counsel maintains that Respondent's March 1987, contribution to the Bill Green for Congress Committee is attributable to the committee's 1986 debt; that Respondent's 1987 contribution to the Biden for President committee should not be counted towards the 1988 calendar year because Mr. Biden withdrew from the 1988 election; and that no further action should be taken with respect to Respondent's $2,000 contribution to the Moynihan Committee because the committee, on its own, reported the contribution in a manner that ensured compliance with 2 U.S.C. § 441a. As noted, this Office has previously responded to these arguments in earlier reports which were approved by the Commission.

441a(a)(1)(A). This Office also recommends that the Commission deny counsel's request to find probable cause to believe but to take no further action in this matter.

D. Henry Kravis

In Respondent Kravis' reply brief, counsel again argues that Respondent Kravis should not be held responsible for exceeding the limits for three reasons. First, counsel cites to alleged confusion surrounding the application of the $25,000 annual limit statutory provision, which he contends the Commission has acknowledged when it recommended to Congress a statutory change in the manner of calculating the individual overall annual contribution limit. Secondly, he contends that contributors are often confused by the names of certain federal committees which, according to counsel, have names suggesting nonfederal activity. Finally, he asserts that certain candidate committees did not designate or attribute contributions as Mr. Kravis intended. See Attachment 1, pages 64 - 71 and the General Counsel's Report, signed June 18, 1992. In regard to the last two assertions, counsel states that the committees did not handle the contributions in accordance with Mr. Kravis' intentions; however, counsel still has not presented any documentation such as copies of checks and/or allocation instructions or solicitation materials to show that the recipient committees were at fault in this matter.

Based on these arguments, counsel insists that the violations were unintentional and the Commission should find

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no probable cause to believe that Mr. Kravis violated the Act, or in the alternative close the file in this matter with no further action. The Commission previously considered counsel's arguments and the General Counsel's response to them and found that although they may be considered mitigating, they do not vitiate the violations. See General Counsel's Report, signed June 18, 1992. Therefore, the Office of the General Counsel recommends that the Commission find probable cause to believe that Henry Kravis violated 2 U.S.C. §§ 441a(a)(3) and 441a(a)(1)(A) and deny respondent's request to take no further action in this matter.

II. **DISCUSSION OF CONCILIATION AGREEMENT AND CIVIL PENALTY**

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IV. RECOMMENDATIONS

1. Find probable cause to believe that Donald J. Trump, Dwayne O. Andreas, Dorothy Inez Andreas, Ronald O. Perelman and Henry Kravis each violated 2 U.S.C. § 441a(a)(3).

2. Find probable cause to believe that Henry Kravis and Ronald O. Perelman violated 2 U.S.C. § 441a(a)(1)(A).

3. Deny counsels' requests for findings of no probable cause to believe and/or no further action against Donald J. Trump, Dwayne O. Andreas, Dorothy Inez Andreas, Ronald O. Perelman and Henry Kravis with regard to the violations in this matter.

4. Approve the attached conciliation agreements and appropriate letters.

10/6/92
Date

Lawrence M. Noble
General Counsel

Attachments
Respondents' Reply Briefs (4)
Proposed Conciliation Agreements (5)

Staff Assigned: Noriega E. James

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/BONNIE J. ROSS
COMMISSION SECRETARY

DATE: OCTOBER 13, 1992

SUBJECT: MUR 3104 - GENERAL COUNSEL'S REPORT
DATED OCTOBER 6, 1992.

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The above-captioned document was circulated to the Commission on Wednesday, October 7, 1992 at 11:00 a.m.

Objection(s) have been received from the Commissioner(s) as indicated by the name(s) checked below:

Commissioner Aikens	_____
Commissioner Elliott	XX
Commissioner McDonald	_____
Commissioner McGarry	_____
Commissioner Potter	_____
Commissioner Thomas	_____

This matter will be placed on the meeting agenda for Tuesday, October 20, 1992.

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

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 3104
Donald J. Trump;	)	
Dwayne O. Andreas;	)	
Dorothy Inez Andreas;	)	
Ronald O. Perelman;	)	
Henry Kravis.	)	

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on October 20, 1992, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 3104:

1. Find probable cause to believe that Donald J. Trump, Dwayne O. Andreas, Dorothy Inez Andreas, Ronald O. Perelman and Henry Kravis each violated 2 U.S.C. § 441a(a)(3).

2. Find probable cause to believe that Henry Kravis and Ronald O. Perelman violated 2 U.S.C. § 441a(a)(1)(A).

3. Deny counsels' requests for findings of no probable cause to believe and/or no further action against Donald J. Trump, Dwayne O. Andreas, Dorothy Inez Andreas, Ronald O. Perelman and Henry Kravis with regard to the violations in this matter.

(continued)

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4. Approve the conciliation agreements and appropriate letters as recommended in the General Counsel's report dated October 6, 1992

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

Attest:

10-20-92
Date

Marjorie W. Emmons
Secretary of the Commission

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 29, 1992

Kenneth S. Levine, Esquire
Wunder, Ryan, Cannon & Thelen
1615 L Street, N.W., Suite 650
Washington, DC 20036

RE: MUR 3104
Henry Kravis

Dear Mr. Levine:

On October 20, 1992, the Federal Election Commission found that there is probable cause to believe your client, Henry Kravis, violated 2 U.S.C. §§ 441a(a)(1)(A) and 441a(a)(3), provisions of the Federal Election Campaign Act of 1971, as amended, in connection with MUR 3104. At the same time, the Commission voted to deny your request to take no further action in this matter.

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 ten days. I will then recommend that the Commission accept the agreement. Please make your 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 Noriega E. James, the staff member assigned to this matter, at (202) 219-3400.

Sincerely,

Lawrence M. Noble
General Counsel

Enclosure
Conciliation Agreement

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 29, 1992

Robert F. Bauer, Esquire
Perkins Coie
607 Fourteenth Street, N.W., Suite 800
Washington, D.C. 20005-2011

RE: MUR 3104
Dwayne O. Andreas
Dorothy Inez Andreas

Dear Mr. Bauer:

On October 20, 1992, the Federal Election Commission found that there is probable cause to believe your clients, Dwayne O. Andreas and Dorothy Inez Andreas, violated 2 U.S.C. § 441a(a)(3), a provision of the Federal Election Campaign Act of 1971, as amended, in connection with MUR 3104. At the same time, the Commission voted to deny your request to amend the General Counsel's brief in this matter.

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 ten days. I will then recommend that the Commission accept the agreement. Please make your 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 Noriega E. James, the staff member assigned to this matter, at (202) 219-3400.

Sincerely,

Lawrence M. Noble
General Counsel

Enclosure
Conciliation Agreement

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 29, 1992

J. Curtis Herge, Esquire
Herge, Sparks, Christopher & Biondi
8201 Greensboro Drive
McLean, VA 22102

RE: MUR 3104
Donald J. Trump

Dear Mr. Herge:

On October 20, 1992, the Federal Election Commission found that there is probable cause to believe your client, Donald J. Trump, violated 2 U.S.C. § 441a(a)(3), a provision of the Federal Election Campaign Act of 1971, as amended, in connection with MUR 3104. At the same time, the Commission voted to deny your request to take no further action in this matter.

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 ten days. I will then recommend that the Commission accept the agreement. Please make your 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 Noriega E. James, the staff member assigned to this matter, at (202) 219-3400.

Sincerely,

Lawrence M. Noble
General Counsel

Enclosure
Conciliation Agreement

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 29, 1992

Kenneth A. Gross, Esquire
Skadden, Arps, Slate, Meagher & Flom
1440 New York Avenue, N.W.
Washington, D.C. 20005-2107

RE: MUR 3104
Ronald O. Perelman

Dear Mr. Gross:

On October 20, 1992, the Federal Election Commission found that there is probable cause to believe your client, Ronald O. Perelman, violated 2 U.S.C. §§ 441a(a)(1)(A) and 441a(a)(3), provisions of the Federal Election Campaign Act of 1971, as amended, in connection with MUR 3104. At the same time, the Commission voted to deny your request to take no further action in this matter.

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 ten days. I will then recommend that the Commission accept the agreement. Please make your 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 Noriega E. James, the staff member assigned to this matter, at (202) 219-3400.

Sincerely,

Lawrence M. Noble
General Counsel

Enclosure
Conciliation Agreement

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 24, 1992

Kenneth A. Gross, Esquire
Skadden, Arps, Slate, Meagher & Flom
1440 New York Avenue, N.W.
Washington, D.C. 20005-2107

RE: MUR 3104
Ronald O. Perelman

Dear Mr. Gross

On October 29, 1992, you were notified that the Federal Election Commission found probable cause to believe that your client, Ronald O. Perelman, violated 2 U.S.C. §§ 441a(a)(1)(A) and 441a(a)(3). On that same date, you were sent a conciliation agreement offered by the Commission in settlement of this matter.

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 as more than 30 days have elapsed without a response from you, 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 from you within 10 days of receipt of this letter.

Should you have any questions, please contact me at (202) 219-3400.

Sincerely,

Noriega E. James
Paralegal

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SKADDEN, ARPS, SLATE, MEAGHER & FLOM
1440 NEW YORK AVENUE, N.W.
WASHINGTON, D.C. 20005-2107
(202) 371-7000

FAX: (202) 393-5760
DIRECT DIAL
(202) 371-

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January 11, 1993

RECEIVED
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OFFICE OF GENERAL COUNSEL

Lisa Klein, Esq.
Noriega James
Federal Election Commission
999 E Street, Northwest
Washington, D.C. 20463

Re: MUR 3104

Dear Lisa and Noriega:

Enclosed is a signed conciliation agreement in the above matter regarding Ronald O. Perelman. I have also enclosed a check for $1,800 in payment of the civil penalty in this matter.

Please date-stamp the extra copy for our records.

Sincerely,

Kenneth A. Gross

Enclosures

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 3104
Dwayne O. Andreas)
Dorothy Inez Andreas)
Henry Kravis)

SENSITIVE

JAN 12 1993

EXECUTIVE SESSION

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On October 20, 1992, the Commission found probable cause to believe that Henry Kravis violated 2 U.S.C. §§ 441a(a)(1)(A) and 441a(a)(3). By same date, the Commission also found probable cause to believe that Dwayne O. Andreas and Dorothy Inez Andreas violated 2 U.S.C. § 441a(a)(3). Respondents were sent conciliation agreements and staff of this Office had several conversations with Respondents' counsel in an attempt to negotiate conciliation proposals that the General Counsel could recommend favorably to the Commission. However, as set forth below, the Office of the General Counsel must recommend that the counteroffers submitted by Respondents be rejected.

A. Dwayne O. Andreas and Dorothy Inez Andreas

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II. **RECOMMENDATIONS**

1. Reject the counteroffer presented on behalf of Dwayne O. Andreas and Dorothy Inez Andreas.

2. Reject the counteroffer presented on behalf of Henry Kravis.

3. Authorize the Office of the General Counsel to file civil suit in the event Respondents do not accept the attached conciliation agreements within 5 days of receipt.

4. Approve the attached counterproposals and the appropriate letters.

1/4/93
Date

Lawrence M. Noble
General Counsel

Attachments
1. Counteroffer from Mr. and Mrs. Andreas
2. Counteroffer from Henry Kravis
3. Proposed counterproposals(2)

Staff Assigned: Noriega E. James

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 3104
Henry Kravis)

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On January 11, 1992, counsel for Mr. Kravis submitted a new counter-proposal

This Office recommends that the Commission accept this counter-offer.

II. RECOMMENDATIONS

1. Accept the counteroffer presented on behalf of Henry Kravis.
2. Close the file with respect to Respondent Henry Kravis.
3. Approve the the appropriate letter.

Lawrence M. Noble
General Counsel

1/12/93
Date

BY: Lois G. Lerner
Associate General Counsel

Attachment
1. Counteroffer from Henry Kravis

Staff Assigned: Noriega E. James

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 3104
Dwayne O. Andreas;	)	
Dorothy Inez Andreas;	)	
Henry Kravis.	)	

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on January 12, 1993, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 3104:

1. Reject the counteroffer presented on behalf of Dwayne O. Andreas and Dorothy Inez Andreas.

2. Authorize the Office of the General Counsel to file a civil suit against Dwayne O. Andreas and Dorothy Inez Andreas if these Respondents do not accept the conciliation agreement recommended in the FEC General Counsel's report dated January 7, 1993, within five days of receipt of this agreement.

3. Accept the counteroffer presented on behalf of Henry Kravis as recommended in the FEC General Counsel's report dated January 12, 1993.

4. Close the file with respect to Respondent Henry Kravis.

(continued)

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5. Direct the Office of General Counsel to send appropriate letters pursuant to the actions noted above.

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

Attest:

1-13-93
Date

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

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 21, 1993

Kenneth S. Levine, Esquire
Wunder, Ryan, Cannon & Thelen
1615 L Street, N.W., Suite 650
Washington, DC 20036

RE: MUR 3104
Henry Kravis

Dear Mr. Levine:

On January 12, 1993, the Federal Election Commission accepted the signed conciliation agreement submitted on your client's behalf in settlement of a violation of 2 U.S.C. §§ 441a(a)(1)(A) and 441a(a)(3), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Accordingly, the file has been closed in this matter as it pertains to Henry Kravis.

This matter will become public within 30 days after it has been closed with respect to all other respondents involved. Please be advised that 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.

You are advised that the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) still apply with respect to all respondents still involved in this matter. The Commission will notify you when the entire file has been closed.

Enclosed you will find a copy of the fully executed conciliation agreement for your files. Please note that the civil penalty is due within 30 days of the conciliation agreement's effective date. If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Noriega E. James

Noriega E. James
Paralegal

Enclosure
Conciliation Agreement

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 3104
Henry Kravis	)	

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission ("Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found probable cause to believe that Henry Kravis ("Respondent") violated 2 U.S.C. §§ 441a(a)(1)(A) and 44la(a)(3).

NOW, THEREFORE, the Commission and the Respondent, 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 Respondent and the subject matter of this proceeding.

II. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondent enters voluntarily into this agreement with the Commission.

IV. The pertinent facts in this matter are as follows:

1. Respondent Henry Kravis is an individual contributor to political committees for the 1988 elections.

2. 2 U.S.C. § 44la(a)(3) limits total contributions by an individual in any calendar year to $25,000. Section 44la(a)(3) also states that any contribution to a candidate or authorized committee with respect to a particular election made in a non-election year shall be considered to be made during the calendar year in which such election is held.

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3. A review of contributions made for the 1988 elections revealed that Respondent made federal contributions totaling $61,961 or $36,961 in excess of the annual limit.

4. Between April and October 1990, Respondent received refunds or redesignated contributions totaling $37,000 to bring the aggregate amount of his 1988 calendar year contributions under $25,000.

5. 2 U.S.C. § 44la(a)(1)(A) limits individual contributions to federal candidates to $1,000 per election.

6. A review of contributions and check copies provided by the Respondent revealed that for 1988, the Respondent made excessive contributions to two candidate committees, totaling $2,000 in excess of the statutory limit.

7. Respondent has received refunds of the excessive contributions made to the candidate committees.

V. Respondent made contributions to federal committees that exceeded, by $36,961 and $2,000 respectively, the limits established by 2 U.S.C. §§ 44la(a)(3) and 44la(a)(1)(A). Respondent contends that he did not knowingly and willfully violate the Federal Election Campaign Act of 1971, as amended.

VI. Respondent will pay a civil penalty to the Federal Election Commission in the amount of Eight Thousand Dollars ($8,000), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VII. 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

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has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

VIII. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

IX. Respondent shall have no more than 30 days from the date this agreement becomes effective to comply with and implement the requirement contained in this agreement and to so notify the Commission.

X. 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.

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FOR THE COMMISSION:

Lawrence M. Noble
General Counsel

BY: _____ 1/19/95
Lois G. Lerner
Associate General Counsel
Date

FOR THE RESPONDENT:

_____ 1/11/95
Kenneth S. Levine
Date

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

January 21, 1993

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Robert F. Bauer, Esquire
Perkins Coie
607 Fourteenth Street, N.W.
Suite 800
Washington, D.C. 20005-2011

RE: MUR 3104
Dwayne O. Andreas
Dorothy Inez Andreas

Dear Mr. Bauer:

This letter is to confirm the Federal Election Commission's receipt of the proposed conciliation agreement submitted on behalf of Dwayne O. Andreas and Dorothy Inez Andreas on December 18, 1992. The Commission has reviewed and rejected the counterproposal. In an effort to resolve this matter, however, the Commission has approved another counteroffer.

Although I am hopeful that this matter can be settled through a conciliation agreement, please be advised that in the absence of your clients' acceptance of the enclosed agreement within 5 days of receipt, the Commission has authorized this Office to institute a civil suit in the U.S. District Court.

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Should you have any questions, please contact Noriega E. James, the staff member assigned to this matter, at (202) 219-3400.

Sincerely,

Lawrence M. Noble
General Counsel

Enclosure
Conciliation Agreement

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 3104
Ronald O. Perelman)

SENSITIVE

GENERAL COUNSEL'S REPORT

I. **BACKGROUND**

On October 20, 1992, the Commission found probable cause to believe Ronald O. Perelman violated 2 U.S.C. §§ 441a(a)(3) and 441a(a)(1)(A). Respondent was sent a proposed conciliation agreement approved by the Commission in settlement of this matter.

II. **DISCUSSION**

Attached is a conciliation agreement that has been signed on behalf of Ronald O. Perelman.

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III. RECOMMENDATIONS

1. Accept the signed conciliation agreement with Ronald O. Perelman and close the file in this matter as it pertains to him.

2. Approve the appropriate letter.

Lawrence M. Noble
General Counsel

1/23/13
Date

BY: _____
Lois G. Lerner
Associate General Counsel

Attachments
1. Signed conciliation agreement
2. Copy of civil penalty check

Staff Assigned: Noriega E. James

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Ronald O. Perelman.	)	MUR 3104
	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on February 3, 1993, the Commission decided by a vote of 5-0 to take the following actions in MUR 3104:

1. Accept the signed conciliation agreement with Ronald O. Perelman and close the file in this matter as it pertains to him, as recommended in the General Counsel's Report dated January 28, 1993.

2. Approve the appropriate letter, as recommended in the General Counsel's Report dated January 28, 1993.

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

Attest:

2-3-93
Date

for Delores Hardy
Marjorie W. Emmons
Secretary of the Commission

Received in the Secretariat: Thurs., Jan. 28, 1993 4:50 p.m.
Circulated to the Commission: Fri., Jan. 29, 1993 12:00 p.m.
Deadline for vote: Wed., Feb. 03, 1993 4:00 p.m.

bjr

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 5, 1993

Kenneth A. Gross, Esquire
Skadden, Arps, Slate, Meagher & Flom
1440 New York Avenue, N.W.
Washington, D.C. 20005-2107

RE: MUR 3104
Ronald O. Perelman

Dear Mr. Gross:

On February 3, 1993, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on your client's behalf in settlement of a violation of 2 U.S.C. §§ 441a(a)(1)(A) and 441a(a)(3), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Accordingly, the file has been closed in this matter as it pertains to Ronald O. Perelman.

This matter will become public within 30 days after it has been closed with respect to all other respondents involved. Please be advised that 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.

You are advised that the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) still apply with respect to all respondents still involved in this matter. The Commission will notify you when the entire file has been closed.

Enclosed you will find a copy of the fully executed conciliation agreement for your files. If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Noriega E. James
Paralegal

Enclosure
Conciliation Agreement

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 3104
Ronald O. Perelman)

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission ("Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found probable cause to believe that Ronald O. Perelman ("Respondent") violated 2 U.S.C. §§ 441a(a)(1)(A) and 441a(a)(3).

NOW, THEREFORE, the Commission and the Respondent, 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 Respondent and the subject matter of this proceeding.

II. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondent enters voluntarily into this agreement with the Commission.

IV. The pertinent facts in this matter are as follows:

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1. Respondent Ronald O. Perelman is an individual contributor to political committees for the 1988 elections.

2. 2 U.S.C. § 441a(a)(3) limits total contributions by an individual in any calendar year to $25,000. Section 441a(a)(3) also states that any contribution to a candidate or authorized committee with respect to a particular election made in a non-election year shall be considered to be made during the calendar year in which such election is held.

3. A review of contributions made in connection with the 1988 elections revealed that Respondent made federal contributions totaling $32,500 or $7,500 in excess of the annual limit. Respondent contends that he acted upon the advice of counsel and that his $5,000 contribution to the Presidential Trust was intended for a nonfederal account.

4. Respondent has obtained and or requested refunds of the amount in excess of the annual limit.

5. 2 U.S.C. § 441a(a)(1)(A) limits individual contributions to federal candidates to $1,000 per election.

6. A review of contributions and check copies provided by the Respondent revealed that during 1986,

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Respondent made a $1,000 excessive contribution to a candidate committee that is attributable to the 1988 election. Respondent contends that he acted upon the advice of counsel and that the $1,000 excessive contribution was intended for the general election although it was made prior to the primary election and there is no written evidence that the contribution was designated for the general election.

V. Respondent made contributions to federal committees that exceeded, by $7,500 and $1,000 respectively, the limits established by 2 U.S.C. §§ 441a(a)(3) and 441a(a)(1)(A).

VI. Respondent will pay a civil penalty to the Federal Election Commission in the amount of One Thousand Eight Hundred Dollars ($1,800), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VII. 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.

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VIII. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

IX. Respondent shall have no more than 30 days from the date this agreement becomes effective to comply with and implement the requirement contained in this agreement and to so notify the Commission.

X. 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:

By: _____ 2/3/93
Lois G. Lerner
Associate General Counsel
Date

By: _____ January 11, 1993
Kenneth A. Gross
Attorney for Respondent
Date

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WUNDER, DIEFENDERFER, RYAN, CANNON & THELEN
1615 L STREET, N.W., SUITE 650
WASHINGTON, D. C. 20036

(202) 659-3005

KENNETH S. LEVINE

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February 5, 1993

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FEDERAL ELECTION COMMISSION
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Mr. Noriega James
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

RE: MUR 3104
Henry Kravis

Dear Mr. James:

Enclosed please find a payment in the amount of Eight Thousand Dollars ($8,000) to fully comply with and implement the requirement contained in the signed conciliation agreement (attached) submitted on behalf of my client, Henry Kravis and accepted by the Federal Election Commission on January 12, 1993.

If you have any questions, please let me know.

Sincerely,

Kenneth S. Levine

KSL/gmj

Enclosures

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 3104
Dwayne O. Andreas	)	
Dorothy Inez Andreas	)	

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a conciliation agreement which has been signed on behalf of Dwayne and Dorothy Andreas. The attached agreement contains no changes from the agreement approved by the Commission on January 12, 1993.

II. RECOMMENDATIONS

1. Accept the attached conciliation agreement with Dwayne and Dorothy Andreas.
2. Close the file as to these respondents.
3. Approve the appropriate letter.

Lawrence M. Noble
General Counsel

2/2/93
Date

BY: _____
Lois G. Lerner
Associate General Counsel

Attachment
Conciliation Agreement

Staff Assigned: Noriega E. James

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Dwayne O. Andreas;	)	MUR 3104
Dorothy Inez Andreas.	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on February 8, 1993, the Commission decided by a vote of 6-0 to take the following actions in MUR 3104:

1. Accept the conciliation agreement with Dwayne and Dorothy Andreas, as recommended in the General Counsel's Report dated February 2, 1993.

2. Close the file as to these respondents.

3. Approve the appropriate letter, as recommended in the General Counsel's Report dated February 2, 1993.

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

Attest:

2/8/93
Date

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

Received in the Secretariat: Wed., Feb. 3, 1993 12:20 p.m.
Circulated to the Commission: Wed., Feb. 3, 1993 4:00 p.m.
Deadline for vote: Mon., Feb. 8, 1993 4:00 p.m.

dr

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 11, 1993

Robert F. Bauer, Esquire
Perkins Coie
607 Fourteenth Street, N.W.
Suite 800
Washington, D.C. 20005-2011

RE: MUR 3104
Dwayne O. Andreas
Dorothy Inez Andreas

Dear Mr. Bauer:

On February 8, 1993, the Federal Election Commission accepted the signed conciliation agreement submitted on your clients' behalf in settlement of a violation of 2 U.S.C. § 441a(a)(3), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). Accordingly, the file has been closed in this matter as it pertains to Dwayne O. Andreas and Dorothy Inez Andreas.

This matter will become public within 30 days after it has been closed with respect to all other respondents involved. Please be advised that 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.

You are advised that the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) still apply with respect to all respondents still involved in this matter. The Commission will notify you when the entire file has been closed.

Enclosed you will find a copy of the fully executed conciliation agreement for your files. Please note that the civil penalty is due within 30 days of the conciliation agreement's effective date. If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Noriega E. James
Paralegal

Enclosure
Conciliation Agreement

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Dwayne O. Andreas	)	MUR 3104
Dorothy Inez Andreas	)	

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission ("Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found probable cause to believe that Dwayne O. Andreas and Dorothy Inez Andreas ("Respondents") violated 2 U.S.C. § 441a(a)(3).

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 enter voluntarily into this agreement with the Commission.

IV. The pertinent facts in this matter are as follows:

1. Respondents Dwayne O. Andreas and Dorothy Inez Andreas are individual contributors to political committees for the 1988 elections.

2. 2 U.S.C. § 441a(a)(3) limits total contributions by an individual in any calendar year to $25,000. Section 441a(a)(3) also states that any contribution to a candidate or

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authorized committee with respect to a particular election made in a non-election year shall be considered to be made during the calendar year in which such election is held.

3. The Commission's review of contributions made for the 1988 elections revealed that respondent Dwayne O. Andreas made contributions totaling $38,680, or $13,680 in excess of the annual limit, and that respondent Dorothy Inez Andreas made contributions totaling $29,680, or $4,680 in excess of the annual limit.

4. Respondents contend that they did not realize that contributions actually made in 1987 and 1989 would count as 1988 contributions if they were made with respect to the 1988 election.

V. Respondents made contributions in excess of the annual contribution limit with respect to the 1988 elections in violation of 2 U.S.C. § 441a(a)(3). Respondents contend that the violations were not knowing and willful.

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of Eight Thousand Dollars ($8,000), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VII. 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.

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VIII. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

IX. Respondents shall have no more than 30 days from the date this agreement becomes effective to comply with and implement the requirement contained in this agreement and to so notify the Commission.

X. 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

BY: _____ Date 2/10/93
Lois G. Lerner
Associate General Counsel

FOR THE RESPONDENTS:

_____ Date 1-29-93
(Name) Robert F. Bauer
(Position) Counsel to Dwayne O. Andreas and Dorothy Inez Andreas

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BEFORE THE FEDERAL ELECTION COMMISSION

EXECUTIVE SESSION

FEB 2 3 1993

In the Matter of)
) MUR 3104
Donald J. Trump)

GENERAL COUNSEL'S REPORT SENSITIVE

SUBMITTED LATE

I. BACKGROUND

On October 20, 1992, the Commission found probable cause to believe Donald J. Trump violated 2 U.S.C. § 441a(a)(3). Respondent was sent a proposed conciliation agreement approved by the Commission in settlement of this matter.

II. DISCUSSION

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III. **RECOMMENDATIONS**

1. Reject the counteroffer presented on behalf of Donald J. Trump.

2. Authorize the Office of the General Counsel to file civil suit in the event Donald J. Trump does not accept the attached conciliation agreement within 10 days of receipt.

3. Approve the attached counterproposal and the appropriate letter.

2-18-93
Date

LM Noble (GP)
Lawrence M. Noble
General Counsel

Attachments
1. Counteroffer
2. Proposed counterproposal

Staff Assigned: Noriega E. James

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 3104
Donald Trump)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on February 23, 1993, do hereby certify that the Commission decided by a vote of 5-0 to take the following actions in MUR 3104:

1. Reject the counteroffer presented on behalf of Donald J. Trump.

2. Approve the counterproposal and the appropriate letter as recommended in the FEC General Counsel's report dated February 18, 1993.

3. Authorize the Office of the General Counsel to file civil suit in the event Donald J. Trump does not accept the conciliation agreement from the FEC within ten days of receipt.

Commissioners Elliott, McDonald, McGarry, Potter, and Thomas voted affirmatively for the decision; Commissioner Aikens was not present.

Attest:

2-23-93
Date

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

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 25, 1993

J. Curtis Herge, Esquire
Herge, Sparks, Christopher & Biondi
8201 Greensboro Drive
McLean, VA 22102

RE: MUR 3104
Donald J. Trump

Dear Mr. Herge:

This letter is to confirm the Federal Election Commission's receipt of the proposed conciliation agreement submitted on behalf of Donald J. Trump on November 9, 1992. The Commission has reviewed and rejected the counterproposal. In an effort to resolve this matter, however, the Commission has approved a final counteroffer.

Although I am hopeful that this matter can be settled through a conciliation agreement, please be advised that in the absence of your client's acceptance of the enclosed agreement within 10 days of receipt, the Commission has authorized this Office to institute a civil suit in the U.S. District Court.

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Should you have any questions, please contact Noriega E. James, the staff member assigned to this matter, at (202) 219-3400.

Sincerely,

Lawrence M. Noble
General Counsel

Enclosure
Conciliation Agreement

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BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

In the Matter of)
) MUR 3104
Donald J. Trump)

GENERAL COUNSEL'S REPORT

I. **BACKGROUND**

Attached is a conciliation agreement which has been signed on behalf of Donald J. Trump.[1] The attached agreement contains no changes from the agreement approved by the Commission on February 23, 1993.

II. **RECOMMENDATIONS**

1. Accept the attached conciliation agreement with Donald J. Trump.
2. Close the file.
3. Approve the appropriate letter.

Lawrence M. Noble
General Counsel

3/8/93
Date

BY: _____
Lois G. Lerner
Associate General Counsel

Attachment
Conciliation Agreement

Staff Assigned: Noriega E. James

1. This agreement was submitted by telefacsimile. Counsel has stated that the signed original agreement will be sent by postal service.

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Donald J. Trump.) MUR 3104

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on March 12, 1993, the Commission decided by a vote of 4-0 to take the following actions in MUR 3104:

1. Accept the conciliation agreement with Donald J. Trump, as recommended in the General Counsel's Report dated March 8, 1993.

2. Close the file.

3. Approve the appropriate letter, as recommended in the General Counsel's Report dated March 8, 1993.

Commissioners Aikens, Elliott, McGarry and Potter voted affirmatively for the decision; Commissioners McDonald and Thomas did not cast votes.

Attest:

3-12-93
Date

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

Received in the Secretariat: Tues., Mar. 9, 1993 9:57 a.m.
Circulated to the Commission Tues., Mar. 9, 1993 11:00 a.m.
Deadline for vote: Fri., Mar. 12, 1993 4:00 p.m.

dr

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FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

March 15, 1993

J. Curtis Herge, Esquire
Herge, Sparks, Christopher & Biondi
8201 Greensboro Drive
McLean, VA 22102

RE: MUR 3104
Donald J. Trump

Dear Mr. Herge:

On March 12, 1993, the Federal Election Commission accepted the signed conciliation agreement submitted on your client's behalf in settlement of a violation of 2 U.S.C. § 441a(a)(3), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). Accordingly, the file has been closed in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receiving your additional materials, any permissible submissions will be added to the public record upon receipt.

Please be advised that 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.

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Enclosed you will find a copy of the fully executed conciliation agreement for your files. Please note that the civil penalty is due within 30 days of the conciliation agreement's effective date. If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Noriega E. James (FAX)

Noriega E. James
Paralegal

Enclosure
Conciliation Agreement

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 3104
Donald J. Trump)

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission ("Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found probable cause to believe that Donald J. Trump ("Respondent") violated 2 U.S.C. § 441a(a)(3).

NOW, THEREFORE, the Commission and the Respondent, 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 Respondent and the subject matter of this proceeding.

II. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondent enters voluntarily into this agreement with the Commission.

IV. The pertinent facts in this matter are as follows:

1. Respondent Donald J. Trump is an individual contributor to political committees for the 1988 elections.

2. 2 U.S.C. § 441a(a)(3) limits total contributions by an individual in any calendar year to $25,000. Section 441a(a)(3) also states that any contribution to a candidate or authorized committee with respect to a particular election made in a non-election year shall be considered to be made during the

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calendar year in which such election is held.

3. The FEC review of contributions made by respondent which are attributable to the 1988 calendar year reveals that, in calendar years 1985, 1987, 1988, and 1989, respondent made contributions totaling $72,050 or $47,050 in excess of the 1988 annual contribution limit.

4. Respondent contends that in December, 1988, after the contributions in question had been made, he solicited and received advice from counsel that the limitation in 2 U.S.C. § 441a(a)(3) applied only to contributions made within a calendar year. Respondent contends that he was not advised by counsel that any contributions to a candidate or authorized committee with respect to a particular election made in a non-election year are considered to be made during the calendar year in which such election is held. Respondent further contends that based upon the advice from his counsel, he requested and, on December 21 and 30, 1988, received refunds totaling $25,000.

V. Respondent made contributions in excess of the annual contribution limit for 1988 in violation of 2 U.S.C. § 441a(a)(3). Respondent contends that the violation was not knowing and willful.

VI. Respondent will pay a civil penalty to the Federal Election Commission in the amount of Fifteen Thousand Dollars ($15,000), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VII. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at

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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.

VIII. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

IX. Respondent shall 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.

X. 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

BY: _____ 3/15/93
Lois G. Lerner
Associate General Counsel
Date

FOR THE RESPONDENT:
DONALD J. TRUMP

By: _____ March 5, 1993
(Name) J. Curtis Herge
(Position) Counsel to Respondent
Date

93004093444429

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 15, 1993

Robert F. Bauer, Esquire
Perkins Coie
607 Fourteenth Street, N.W., Suite 800
Washington, D.C. 20005-2011

RE: MUR 3104
Dwayne O. Andreas
Dorothy Inez Andreas

Dear Mr. Bauer:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receiving your additional materials, any permissible submissions will be added to the public record upon receipt.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Noriega E. James (NEJ)
Noriega E. James
Paralegal

9304093443430

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 15, 1993

C. Jedson Nau, Esquire
100 Crescent Court
Suite 1700
Dallas, TX 75201

RE: MUR 3104
Caroline Rose Hunt

Dear Mr. Nau:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receiving your additional materials, any permissible submissions will be added to the public record upon receipt.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Noriega E. James

Noriega E. James
Paralegal

9304093443431

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 15, 1993

Kenneth S. Levine, Esquire
Wunder, Ryan, Cannon & Thelen
1615 L Street, N.W., Suite 650
Washington, DC 20036

RE: MUR 3104
Henry Kravis

Dear Mr. Levine:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receiving your additional materials, any permissible submissions will be added to the public record upon receipt.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Noriega E. James (NEJ)
Noriega E. James
Paralegal

9304093443 2

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 15, 1993

Kenneth S. Levine, Esquire
Wunder, Ryan, Cannon & Thelen
1615 L Street, N.W., Suite 650
Washington, DC 20036

RE: MUR 3104
Raymond Kravis

Dear Mr. Levine:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receiving your additional materials, any permissible submissions will be added to the public record upon receipt.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Noriega E. James (JER)

Noriega E. James
Paralegal

9304093444333

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 15, 1993

Kenneth A. Gross, Esquire
Skadden, Arps, Slate, Meagher & Flom
1440 New York Avenue, N.W.
Washington, D.C. 20005-2107

RE: MUR 3104
Ronald O. Perelman

Dear Mr. Gross:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receiving your additional materials, any permissible submissions will be added to the public record upon receipt.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Noriega E. James

Noriega E. James
Paralegal

9304093444334

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 15, 1993

Lyn Utrecht, Esquire
Manatt, Phelps & Phillips
1200 New Hampshire Avenue, N.W.
Suite 200
Washington, DC 20036

RE: MUR 3104
Ira Riklis

Dear Ms. Utrecht:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receiving your additional materials, any permissible submissions will be added to the public record upon receipt.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Noriega E. James (jfk)

Noriega E. James
Paralegal

9304093435

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 15, 1993

Gerald Harris, Esquire
Rubin, Baum, Levin, Constant & Friedman
30 Rockefeller Plaza
New York, NY 10019

RE: MUR 3104
Meshulam Riklis

Dear Mr. Harris

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receiving your additional materials, any permissible submissions will be added to the public record upon receipt.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Noriega E. James (NEJ)
Noriega E. James
Paralegal

9304093444336

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 15, 1993

Phil Beck, Esquire
Kirkland & Ellis
200 East Randolph Drive
Chicago, IL 60601

RE: MUR 3104
Harold C. Simmons

Dear Mr. Beck:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receiving your additional materials, any permissible submissions will be added to the public record upon receipt.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Noriega E. James
Paralegal

9304093444437

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 15, 1993

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Fred M. Wertheimer
Common Cause
2030 M Street, N.W.
Washington, D.C. 20036

RE: MUR 3104

Dear Wertheimer:

This is in reference to the complaint you filed with the Federal Election Commission on November 2, 1990, concerning possible violations of the Federal Election Campaign Act of 1971, as amended ("the Act"). The matter was originally designated MUR 3161. Because the issues in your complaint were identical to those in ongoing MUR 3104, the Commission, on January 16, 1991, determined to merge MUR 3161 into MUR 3104.

The Commission found that there was either reason to believe or probable cause to believe Dorothy Inez Andreas, Dwayne O. Andreas, Henry Kravis, Raymond Kravis, Ronald O. Perelman, Ira Riklis and Harold C. Simmons violated 2 U.S.C. § 441a(a)(3). Additionally, the Commission found that there was either reason to believe or probable cause to believe Henry Kravis, Ronald O. Perelman and Ira Riklis violated 2 U.S.C. § 441a(a)(1)(A) and that Harold C. Simmons violated 2 U.S.C. §§ 441a(a)(1)(A) and 441a(a)(1)(C). Subsequent to the Commission's investigation in this matter, each respondent signed a conciliation agreement that includes an admission of the violation(s) and calls for the payment of a civil penalty.

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Accordingly, the Commission closed the file in this matter on March 12, 1993. Copies of these agreements are enclosed for your information.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Noriega E. James
Paralegal

Enclosures
Conciliation Agreements(6)

9304093444439

FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

THIS IS THE END OF MUR # 3104

DATE FILMED 3/17/93 CAMERA NO. 4

CAMERAMAN E.E.S.

93040093444 40

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

✓ Microfilm

_____ Public Rcds

_____ Press

THE FOLLOWING DOCUMENTATION IS ADDED TO

THE PUBLIC RECORD IN CLOSED MUR 3104.

3/23/93

93040934674

HERGE, SPARKS & CHRISTOPHER
ATTORNEYS AT LAW
SUITE 300
8280 GREENSBORO DRIVE
McLEAN, VIRGINIA 22102
(703) 848-4700

J. CURTIS HERGE
ROBERT B. SPARKS, JR.
A. MARK CHRISTOPHER
MATTHEW SCOTT McCONNELL
MARGO A. OWEN
PETER H. FARLEY

TELECOPIER NUMBER
(703) 893-7371

FEDERAL ELECTION COMMISSION
93 MAR 22 PM 4:50

March 16, 1993

Lawrence M. Noble, Esq.
General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D. C. 20463

Re: MUR 3104: Donald J. Trump

Dear Mr. Noble:

This will acknowledge the receipt of the notification from your office that, on March 12, 1993, the Federal Election Commission accepted the conciliation agreement of our client, Donald J. Trump, in settlement of the matters addressed in MUR 3104. As set forth in that conciliation agreement, we are submitting to you herewith Respondent's check, drawn to the order of Federal Election Commission in the amount of $15,000.00, in payment of the civil penalty.

Sincerely yours,

J. Curtis Herge
Counsel to Donald J. Trump

:sbl

Enclosure

93040934675

MAR 19 11 28 AM '93
FEDERAL ELECTION COMMISSION
MAIL ROOM

93 MAR 22 PM 4:33

DONALD J. TRUMP

8279

March 4, 1993

63-101

PAY TO THE ORDER OF Federal Election Commission $ 15,000 XX/100

EXACTLY 15000 AND 00 CTS DOLLARS

CHASE The Chase Manhattan Bank, N.A.
161 - 10 Jamaica Avenue
Jamaica, NY 11432

9304093476

OGC 9757

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 8, 1993

TWO WAY MEMORANDUM

TO: OGC, Docket

FROM: Philomena Brooks
Accounting Technician

SUBJECt: Account Determination for Funds Received

We recently received a check from Donald J. Trump, check number 5207, dated March 4, 1993, and in the amount of $15,000.00. Attached is a copy of the check and any correspondence that was forwarded. Please indicate below the account into which it should be deposited, and the MUR number and name.

TO: Philomena Brooks
Accounting Technician

FROM: OGC, Docket By aa

In reference to the above check in the amount of $15,000.00, the MUR number is 3104 and in the name of Donald J. Trump. The account into which it should be deposited is indicated below:

✓ Budget Clearing Account (OGC), 95F3875.16

__ Civil Penalties Account, 95-1099.160

__ Other: _____

Anita Alexander
Signature

3/22/93
Date

93040934677

FEDERAL ELECTION COMMISSION
WASHINGTON DC 20463

March 18, 1993

Robert F. Bauer, Esquire
Perkins Coie
607 Fourteenth Street, N.W., Suite 800
Washington, D.C. 20005-2011

RE: MUR 3104
Dwayne O. Andreas
Dorothy Ines Andreas

Dear Mr. Bauer:

On February 8, 1993, the Federal Election Commission and your clients, Dwayne O. Andreas and Dorothy Ines Andreas, entered into a conciliation agreement in settlement of violations of 2 U.S.C. § 441a(a)(3). According to the agreement, your clients were required to pay a civil penalty of $8,000.

According to Commission records, the payment has not been received. Please be advised that, pursuant to 2 U.S.C. § 437g(a)(5)(D), violation of any provision of the conciliation agreement may result in the institution of a civil suit for relief in the United States District Court. Unless we receive the payment from your clients by March 26, 1993, this Office will recommend that the Commission file suit to remedy this violation.

If you believe the Commission's records are in error, or if you have any questions, please contact me at (202) 219-3400.

Sincerely,

Noriega E. James

Noriega E. James
Paralegal

93040934678