FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

THIS IS THE BEGINNING OF MUR # 3309

DATE FILMED 8-4-93 CAMERA NO. 4

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 13, 1991

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

THROUGH: JOHN C. SURINA
STAFF DIRECTOR

FROM: ROBERT J. COSTA
ASSISTANT STAFF DIRECTOR
AUDIT DIVISION

SUBJECT: REFERRALS TO THE OFFICE OF GENERAL COUNSEL - FINAL AUDIT REPORT ON DOLE FOR PRESIDENT

On February 26, 1991 the Commission voted to refer to your office the following matters from the Final Audit Report (FAR) on the Dole for President Committee.

- Exhibit A Prohibited Contributions
- Exhibit B Use of Corporate Aircraft
- Exhibit C.1 Apparent Excessive Contributions (Inds)
- Exhibit C.2 Apparent Excessive Contributions (Pol. Comtes)
- Exhibit C.3 Apparent Excessive Contributions - Compliance Fund
- Exhibit E Allocation of Expenditures to States*/
- Exhibit G Delegate Committees - Failure to Maintain Records

  Delegate Committees - Failure to File Disclosure Reports
- Exhibit H Testing the Waters Expenditures Made by Campaign America

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*/ The Commission approved this matter subject to revisions to the Phone Banks Section (E.4.). The revised Phone Banks Section was approved by the Commission on March 26, 1991.

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The referrals were held pending Commission action on the FAR which when approved by the Commission on April 25, 1991, contained major changes to the "State Allocation" and "Testing the Waters" matters from when these matters were approved during the consideration of the referrals. Although no adjustments to the referrals have been made, a copy of the corresponding FAR finding is attached for your information (both matters are included in FAR Finding III.C.).

Regarding Exhibit A (Prohibited Contributions), we have identified on Attachment 1 the 61 contributions ($21,686.88) for which the Committee has submitted signed contributor statements indicating that the contributions were made from personal funds but for which we were given conflicting information from the various Secretaries of State. We have also attached copies of the 61 letters. When considering this matter, the Commission indicated that this information should be included with the referral.

In addition, the Committee also submitted personal funds letters from the same contributors as 21 other contributions included on Exhibit A, Attachment 1 ($2,845.00). However, these letters pertained to contributions which were not included in this finding. The Audit staff was unable to determine if contributions from the same contributors included in the finding were paid from the same bank accounts as items supported by these personal funds letters.

Also attached are the supporting schedules related to Exhibit C.1 (Excessive Contributions from Individuals). These schedules are attached as recommended in your Legal Analysis on the Dole for President FAR dated December 17, 1990 (Page 32).

If you have any questions, please contact Marty Favin or Joe Stoltz at 376-5320.

Attachments as stated

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DUE TO THEIR BULK, THE ATTACHMENTS SUBMITTED WITH THIS FINAL AUDIT REPORT HAVE BEEN DELETED FROM THE FILE. UPON REQUEST, THEY WILL BE MADE AVAILABLE FOR REVIEW AND COPYING.

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

FIRST GENERAL COUNSEL'S REPORT **SENSITIVE**

MUR 3309
STAFF MEMBERS:[1]
Anne Weissenborn
Elizabeth Campbell
Lawrence D. Parrish
Mary Taksar
Joi Roberson

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

RESPONDENTS:
Dole for President Committee and James L. Hagen, as treasurer

Campaign America and Judith F. Taggart, as treasurer

9 Corporations

23 Individuals

11 Political Committees

RELEVANT STATUTES:
2 U.S.C. § 432
2 U.S.C. § 434
2 U.S.C. § 441a
2 U.S.C. § 441b
26 U.S.C. § 9035(a)
11 C.F.R. § 100.7(a)(1)
11 C.F.R. § 100.8(b)(1)
11 C.F.R. § 102.9(e)
11 C.F.R. § 103.3(b)
11 C.F.R. § 104.3(f)
11 C.F.R. § 104.14(b)
11 C.F.R. § 110.1
11 C.F.R. § 110.2
11 C.F.R. § 110.14
11 C.F.R. § 114.9(e)
11 C.F.R. § 9003.3(a)
11 C.F.R. § 9034.4(a)(2)
11 C.F.R. § 9034.4(b)(4)
11 C.F.R. § 9038.2(b)(2)(ii)(A)
11 C.F.R. § 9038.6

1. Because of the size of this matter, it was divided among several staff in order to expedite the preparation of this report.

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INTERNAL REPORTS CHECKED: Audit Documents

FEDERAL AGENCIES CHECKED: None

I. GENERATION OF MATTER

This matter was generated by an audit of the Dole for President Committee pursuant to 26 U.S.C. § 9038(a) to determine whether there had been compliance with the provisions of the Federal Election Campaign Act of 1971, as amended ("the Act") and of the Presidential Primary Matching Payment Account Act ("Matching Payment Act"). See also, 26 U.S.C. § 9039(b) and 11 C.F.R. § 9038.1(a)(2). On February 26, 1991, the Commission voted to refer certain matters arising from the audit to the Office of General Counsel for enforcement purposes. On March 26, 1991, the Commission made certain revisions to the Phone Banks Section of the referral and further changes to the state allocations and testing the waters portions on April 25, 1991. The referral was forwarded to this Office on May 13, 1991.[2]

II. FACTUAL AND LEGAL ANALYSIS

A. Excessive State Expenditures

1. Background

For purposes of the Act and the Matching Payment Act a contribution includes any gift, subscription, loan, advance, or deposit of money or anything of value made for purposes of

2. Because of the revisions made by the Commission subsequent to the referral, the material at Attachment 1 does not contain Exhibits E and H relating to the allocation of expenditures to states and testing the waters expenditures made by Campaign America. Instead, the final audit report with the initial repayment determinations has been used and should be consulted.

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influencing a federal election. 2 U.S.C. § 431(8)(A) and 11 C.F.R. § 100.7(a); U.S.C. § 9032(4) and 11 C.F.R. § 9032.4. "Anything of value" includes in-kind contributions. 11 C.F.R. § 100.7(a)(1)(iii).

When an individual becomes a candidate, any funds received, loans obtained or disbursements made prior to becoming a candidate in connection with his or her campaign shall be deemed to have been received, obtained or made as an agent of his or her authorized committee. 11 C.F.R. § 101.2(b)

Funds received and payments made solely for the purpose of determining whether an individual should become a candidate are not contributions or expenditures for purposes of the Act. Examples of activities permissible under this exemption include, but are not limited to, conducting a poll, telephone calls, and travel. If the individual subsequently becomes a candidate, the funds received and expended would become contributions subject to the reporting requirements of the Act. Such contributions and expenditures must be reported with the first report filed by the principal campaign committee, regardless of the date the funds were received or expended. 11 C.F.R. §§ 100.7(b)(1), 100.8(b)(1), and 101.3.

The Commission has addressed the issue of testing the waters in Advisory Opinion ("AO") 1985-40 and Advisory Opinion 1986-6, both of which concerned an unauthorized political committee associated with a prospective presidential candidate. In AO 1985-40, the Commission concluded that expenses paid by an unauthorized political committee for an individual considering

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whether to become a candidate would be considered testing the waters expenses, if such activities related to the potential candidacy and that individual subsequently became a candidate. Such expenditures would be deemed qualified campaign expenses and would be subject to the candidate's expenditure limitations under 2 U.S.C. § 441a(b). In AO 1986-6, the Commission determined that expenditures made for testing the waters purposes must be treated as in-kind contributions to the candidate.

No candidate for the office of President of the United States, who is eligible under Section 9033 of Title 26 to receive payments from the Secretary of the Treasury, may make expenditures in any one state aggregating in excess of the greater of 16 cents multiplied by the voting age population of the state, or $200,000.00, as adjusted by changes in the Consumer Price Index. 2 U.S.C. §§ 441a(b)(1)(A) and 441a(c) and 26 U.S.C. § 9035(a). Except for expenditures exempted under 11 C.F.R. § 106.2, expenditures incurred by a candidate's authorized committee(s) for the purpose of influencing the nomination of that candidate for the office of President with respect to a particular state shall be allocated to that state. 11 C.F.R. § 106.2(a)(1).

The categories of expenditures exempted from state allocation are outlined at 2 U.S.C. § 431(9)(B)(vi) and 11 C.F.R. §§ 106.2(b)(2)(v) and 106.2(c). National campaign expenditures, including operating expenditures related to a national campaign headquarters, national advertising, and nationwide polls, are not allocable, nor are media production costs whether or not the

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media advertising is used in more than one state. 11 C.F.R. § 106.2(c)(1) and (2). Interstate travel and telephone calls are also exempt. 11 C.F.R. §§ 106.2(b)(2)(v) and 106.2(c)(4). An amount equal to 10 percent of campaign workers salaries and overhead expenditures in a particular state may be excluded from allocation to that state as an exempt compliance cost. An additional amount equal to 10 percent of such salaries and overhead expenditures in a particular state may be excluded from allocation to that state as exempt fundraising expenditures, but this exemption shall not apply within 28 calendar days of the primary election. 2 U.S.C. § 431(9)(B)(vi) and 11 C.F.R. § 106.2(c)(5). Overhead expenditures include, but are not limited to, rent, utilities, office equipment. furniture, supplies, and telephone service base charges. 11 C.F.R. § 106.2(b)(2)(iv). Overhead expenses of a committee's regional office or other office which services more than one state are to be allocated on a "reasonable and uniformly applied basis." 11 C.F.R. § 106.2(b)(2)(iv)(B).

2. Audit Determinations

For the 1988 presidential primary elections, the expenditure limitation for the State of Iowa was $775,217.60; for the State of New Hampshire the limitation was $461,000.00. The Committee initially provided computerized worksheets to the Audit Division that showed allocable costs to Iowa and New Hampshire of $793,230.82 and $462,462.20 respectively, as of October 31, 1988. These totals agreed with the totals disclosed by the Committee on its FEC Form 3P, Page 3, dated March 31, 1989. Thus, based upon

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the information provided by the Committee itself, the Committee exceeded the expenditure limitations by $18,013.22 in Iowa and by $1,462.20 in New Hampshire.

In its response to the Interim Audit Report, the Committee stated that it agreed with certain additional allocations to Iowa and New Hampshire for intrastate telephone calls and broadcast media. The audit had calculated an additional $23,280.46 in allocations to Iowa and an additional $1,696.44 to New Hampshire for intrastate calls. It also had allocated an additional $2,595.98 to Iowa and an additional $37,295.89 to New Hampshire for broadcast media. Thus, the original totals submitted by the Committee, plus the additional allocations agreed to by the Committee, resulted in the Committee's having exceeded the expenditure limits by at least $43,889.66 in Iowa and $40,454.53 in New Hampshire.

The Committee at the Interim Audit Report stage continued to take issue with other audit determination figures. After considering the Committee's arguments and staff recommendations, the Commission included in the initial determination the following additional allocations:

Additional Audit Allocations	Iowa	New Hampshire
1. Dole Travel	$28,450.36	$13,997.06
2. Fundraising Exemptions-Direct Mail Costs	51,935.78	43,618.56
3. New England Regional Office	-0-	54,341.62
4. Compliance Exemptions-Media Costs	16,061.46	13,961.15
5. Media Commissions (Production)	2,664.64	2,988.08

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6. Travel and Salary Costs	73,161.62	66,349.25
7. Non-Travel and Salary Costs	35,179.99	31,085.16
8. Polling Expenses	21,497.25	31,636.50
9. Testing the Waters Expenditures Made by Campaign America	33,889.32	4,517.29
Total amount in dispute:	**$262,840.42**	**$262,494.67**

On April 29, 1991, the Commission made an initial determination that the Committee be required to repay $170,043.82 ($609,679.28 in excessive expenditures in Iowa and New Hampshire times the repayment ratio of 27.8907 percent).

In its response to the Commission's initial repayment determination, the Committee has continued to oppose inclusion of the following four items cited above: (1) Dole travel, (2) expenses of the New England Regional Office, (3) media commissions (production), and (4) testing-the-waters expenditures made by Campaign America.[3] By no longer opposing the other

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3. The Committee's treasurer, in opposing the inclusion of Dole travel expenses, stated that a 25 percent exemption was taken with regard to costs of travel incurred by Senator and Elizabeth Dole to reflect the fundraising efforts associated with their intrastate travel and attendance at events. According to the treasurer, whenever Senator Dole and Elizabeth Dole traveled, they made requests for contributions. The Committee selected 25 percent as a "reasonable" judgment of what these requests were worth to the Committee's fundraising efforts. The Commission, in the absence of documentation supporting the Committee's position, has not found these expenditures to be covered by the fundraising exemption and therefore has found them allocable.

The Committee continues to oppose the inclusion of expenses of an office located in Manchester, New Hampshire which was designated the New England regional office. Certain expenditures were allocated to this office by the Committee as regional expenses, of which 60% were then allocated to New Hampshire. The Commission allocated 100% of some of these expenditures to New

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expenditures listed above, the Committee apparently concedes that it exceeded the Iowa expenditure limitation of $775,217.60 by at least $241,725.76 ($43,889.66 previously acknowledged plus $197,836.10 in additions included in the Final Audit Report), and the New Hampshire expenditure limitation of $461,000 by at least $227,105.15 ($40,454.53 previously acknowledged plus $186,650.62). All expenditures that the Commission decides, as part of the repayment process, are allocable to these states will be incorporated into this enforcement matter and appropriate adjustments made.

As explained above, based solely upon the original allocations to Iowa and New Hampshire made by the Committee and upon the additional allocations expressly accepted by the Committee for credit card telephone calls and broadcast media, the Committee exceeded the state by state expenditure limit by at least $43,889.66 in Iowa and $40,454.53 in New Hampshire. As stated above, the additional allocations seemingly no longer being contested by the Committee would raise those figures to $241,725.76 and $227,104.15 respectively. When the allocations

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(Footnote 3 continued from previous page)
Hampshire in light of information indicating that the office functioned primarily as the Committee's New Hampshire office.

Also opposed by the Committee is the inclusion of certain media commissions. The Committee paid Ringe Media Inc. ("RMI") a commission equal to 1.5% of gross air time costs for all placements of commercials produced by RMI. The Committee did not make allocations to Iowa and New Hampshire for the 1.5% commission paid to RMI, arguing that the commission payments were part of non-allocable production costs. The Commission has included the commissions as allocable media placement costs.

Finally, the Committee opposes the Commission's inclusion of payments made by Campaign America as allocable testing-the-waters expenditures.

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still being contested are added, the amounts of excessive expenditures would be $306,730.08 and $302,949.20 respectively.

Thus, the General Counsel recommends that the Commission find reason to believe that the Dole For President Committee and James L. Hagen, as treasurer, violated 2 U.S.C. § 441a(b)(1)(A) and 26 U.S.C. § 9035(a).

B. Testing the Waters -- Campaign America

No multi-candidate political committee shall make contributions to any candidate and his authorized political committee with respect to any election for Federal office which, in the aggregate, exceed $5,000.00. 2 U.S.C. § 441a(a)(2)(A) and 11 C.F.R. § 110.2(a)(1),

Campaign America is a registered multi-candidate committee associated with the candidate.[4] According to a Campaign America newsletter, Senator Dole is the "Honorary Chairman" of Campaign America.

A review of Campaign America records made available in response to a subpoena issued during the audit of the Dole Committee revealed that at least 19 Campaign America-sponsored events, speeches, or meetings were held in Iowa between March 31, 1986, and February 23, 1987. Four of these events were apparently testing the waters expenditures made by Campaign America on behalf of the Committee: (1) a February 7, 1987, town meeting in Orange City, Iowa; (2) a February 12, 1987, town meeting in Dubuque, Iowa; (3) a February 22, 1987, town meeting

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4. Campaign America registered with the Commission in March 1978.

in Des Moines, Iowa; and (4) a February 23, 1987, breakfast meeting in Davenport, Iowa.[5] The costs associated with the four events totaled $14,684.35.

These four events appear to have been similar to the events of the same name sponsored by the Committee. Invitation postcards for the town meetings sponsored by the Committee and by Campaign America were printed by the same Iowa firm and employed the same format and picture. (Attachments 3 and 4). The postcard for the February 22, 1987, event began with the message, "With the 1986 campaign behind us, Republican voters and candidates clearly have major challenges ahead in 1988. During this meeting I would like to hear your views and concerns while sharing some of my own with you regarding our shared Republican future."[6] The printing bill for the February 22 postcards also covered a flyer entitled "Bob Dole on the Issues" which contained the quotation, "If Senator Dole is running for the White House, he's off on the right foot." (Attachment 5).

Campaign America also supplied the Commission with a memorandum dated February 18, 1987, from Beverly Hubble to Senator Dole containing "Iowa talking points." The talking points memorandum begins with a section entitled "Quad Cities Issues." (Attachment 6). On February 23, 1987, Campaign America paid for the above-cited breakfast meeting for 53 people in

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5. The Dole Committee has continued to disagree with the treatment of Campaign America expenditures as testing the waters payments on behalf of Senator Dole's presidential candidacy.

6. No samples of the other postcard invitations are available.

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Davenport, Iowa, one of the Quad Cities.[7] Also included in this memo was a section entitled "Offer Iowans a Friend in the White House," which read, "If the candidates are confronted with the question: How should your PAST commitments assure IOWANS that if you are elected Iowa will have a friend in the White House . . . . It's likely NO ONE could answer that challenge as effectively as RFD. So we should make sure that question is asked . . . and asked . . . and asked."

In addition to finding that the $14,684.35 in Campaign America expenditures for the four events consisted of allocable testing the waters payments, the Commission has determined that Campaign America staff expenses associated with the same events were likewise allocable testing the waters payments and thus allocable. These expenditures totaled $10,214.70.

Campaign America also paid a firm $8,010.67 to purchase and edit an Iowa Republican voter tape previously compiled at Campaign America's expense, to print labels, to keypunch telephone canvas card data, to update the master file with survey data, and to print selected "Dole favorable" labels. In addition, Campaign America paid the same vendor $979.60 for selecting and printing Dole favorables, for computer tapes of Dole favorables, and for selecting and printing labels for persons in selected Iowa counties. It appears from the invoices that the survey data was used with respect to Campaign America events in Iowa in January and February 1987. The Committee used

7. The Quad Cities are comprised of the following: Davenport, IA; Bettendorf, IA; Moline, IL; and Rock Island, IL.

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the same vendor for its own activities.

A review of Campaign America records also revealed 117 payments in New Hampshire totaling $3,136.26 to various towns for voter lists in late 1986 and early 1987, plus $2,223.16 in telephone costs for a business telephone, the number of which was later used by the Committee and $1,381.03 of which cost was allocable to New Hampshire. The Commission has deemed these costs testing the waters expenditures made by Campaign America on behalf of Dole for President.

As testing the waters expenditures, the above Campaign America payments became in-kind contributions to the Committee which were subject to the $5,000.00 limitation at 2 U.S.C. § 441a(a)(2)(A). Because these Campaign America expenditures totaled $38,406.61, or $33,406.61 in excess of the limitation, the Office of the General Counsel recommends that the Commission find reason to believe that Campaign America violated 2 U.S.C. § 441a(a)(2)(A) and that Dole for President violated 2 U.S.C. § 441a(f).

C. Corporate Contributions and Corporate Aircraft

It is unlawful for any corporation to make a contribution or expenditure in connection with any election to any political office, or in connection with any primary election or political convention or caucus held to select candidates for any political office, or for any corporation whatever to make a contribution or expenditure in connection with any election at which presidential and vice presidential electors or a Senator or Representative in, or a Delegate or Resident Commissioner to, Congress are to be

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voted for, or in connection with any primary election or political convention or caucus held to select candidates for any of the foregoing offices. 2 U.S.C. § 441b(a). It is also unlawful for any candidate, political committee, or other person knowingly to accept or receive any contribution prohibited by this section, or any officer or any director of any corporation to consent to any contribution or expenditure by the corporation, prohibited by this section. Id.

The treasurer of a committee is responsible for examining all contributions received for evidence of illegality. 11 C.F.R. § 103.3(b). When contributions received present genuine questions as to whether they were made by corporations, within ten days of receipt, the treasurer can deposit the funds into a campaign depository or return them to the contributor. If any such contribution is deposited, the treasurer shall make at least one written or oral request for evidence of the legality of the contribution. If the contribution cannot be determined to be legal, the treasurer shall within thirty days of the treasurer's receipt of the contribution, refund the contribution to the contributor. 11 C.F.R. § 103.3(b)(1). However, if the treasurer determined at the time the contribution was received that it was not illegal, but later discovers its illegality based on new evidence not available to the committee at the time of receipt or deposit, the treasurer shall refund the contribution within thirty days of discovering its illegality. 11 C.F.R. § 103.3(b)(2). In addition, any contribution which appears to be illegal and which is deposited into a campaign depository shall

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not be used for any disbursements by the political committee until the contribution has been determined to be legal. The political committee must either establish a separate account in a campaign depository for such contributions or maintain sufficient funds to make all such refunds. 11 C.F.R. § 103.3(b)(4).

1. In-Kind Corporate Contributions

The examination and audit of the Dole for President Committee determined that the Committee received 213 contributions totaling $68,043.38, which were identified as contributions from corporations. Included in this total are two in-kind contributions totaling $3,750.00.[8] The review of the Committee's vendor records indicated that the Committee made a payment of $12,000 to H & W Aviation for use of a chartered aircraft. This amount appears to be $2,750 less than the fair market price for the services provided. In its response to the Interim Audit Report, the Committee contends that there was a dispute as to the amount charged for the services provided and that the payment of the $12,000 was not a reduced price. In addition, the Committee alleges that the amount of $12,000 represented the fair market price for the services provided. A letter from H & W Aviation stated that the $12,000 paid to H & W Aviation was a discount from the standard price and was reached as a compromise between

8. The third in-kind contribution identified in the referral totaling $70.82 was clarified by the Committee's response and has been deleted.

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the $14,750 price and the "partners" price of $9,800.[9] According to the audit, a review of the documentation in this matter failed to present any evidence which would indicate that the amount paid was not a discount. The Committee has also failed to submit any further documentation evidencing its contention that the $12,000 represents the fair market value for the services provided. Thus, it appears that the $2,750.00 discount from H & W Aviation would constitute an in-kind contribution from a corporation in violation of the Act.

In addition to the $12,000 payment to H & W Aviation, the Committee's vendor records also indicated that the Committee made a reimbursement of $9,905.00 to Owen & Associates for use of a private airplane.[10] This amount appears to be $1,000 less than the usual and normal charge for the service of the airplane. It appears from the evidence on hand that the charter rate for the aircraft was $150.00 per hour and that the Committee used 72.7 hours. Therefore the actual total due for the use of the aircraft was $10,905 ($150.00 X 72.7 hours = $10,905).

The Committee contends that the $1,000 difference was predicated on the $1,000 transportation expense exemption pursuant to 11 C.F.R. § 100.7(b)(8). Insomuch as the Committee did not proffer any documentation which would evidence the

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9. The meaning of "partners" price is not entirely clear. This Office is assuming it refers to the rental price charged when the aircraft's owners use it.

10. The payments to Owen & Associates were not made in advance of the use of the aircraft. The $9,905.00 payment is discussed in the following section covering the use of corporate aircraft.

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possibility that an individual paid for the aircraft from personal funds, the Committee has failed to support their contention that the $1,000 difference was not a corporate in-kind contribution. Furthermore, 11 C.F.R. § 100.7(b)(8) applies only to individuals. Thus, it appears that the $1,000 reduction from the usual and normal charge for the service of Owen & Associates' aircraft would constitute an in-kind contribution from a corporation in violation of the Act.

Therefore, the Office of the General Counsel recommends that the Commission find reason to believe that the Dole for President Committee violated 2 U.S.C. § 441b(a) by accepting in-kind corporate contributions from H & W Aviation and Owen & Associates. In addition, this Office recommends that the Commission find reason to believe that H & W Aviation and Owen & Associates[11] violated 2 U.S.C. § 441b(a) by making prohibited in-kind contributions to the Dole for President Committee.

2. Apparent Corporate Contributions

As noted, the Committee received 213 contributions totaling $68,043.38, all of which the audit has identified as contributions from corporations which were not refunded or not refunded in a timely manner. The audit identified 25 refunds out of the 213, totaling $7,201.00, which were not made timely. The 213 contributions included the 2 corporate in-kind contribution discussed in the previous section. It should also be noted a

11. As noted, the remaining $9,905.00 is also involved in an alleged violation of 2 U.S.C. § 441b(a) by failing to require advance payments before providing travel on its aircraft.

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separate account was not established by the Committee. However, the Committee appears to have maintained sufficient funds with which to make refunds.

In response to the Interim Audit Report, the Committee submitted documentation for some of the corporate contributions which consisted of either signed contributor letters and check copies indicating that the funds were personal. Based upon these documents, coupled with information from various Secretaries of State, the Audit deleted 37 contributions totaling $7,492.70 from its initial finding in reaching the 213 remaining corporate contributions. As to the other contributions, the Audit was able to obtain information from the various Secretaries of State which indicated that they had corporations in their states with the same names and addresses as to the remaining contributors. The checks also indicated the contributor was a business. In some cases this information was in conflict with the information which the Audit had received from the Committee indicating that these contributions were from non-corporate sources. Therefore, these items are still considered as apparent corporate contributions. The Committee also conceded that 11 of the 213 contributions were "probably corporate," but failed to submit any evidence indicating that refunds were made as to the these contributions. The Committee has had an opportunity to provide information to demonstrate that the above-mentioned contributions were not from a corporate source. Based upon the foregoing, it appears that the Committee has violated 2 U.S.C. § 441b by accepting prohibited corporate contributions.

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Therefore, the Office of the General Counsel recommends that the Commission find reason to believe that the Dole for President Committee violated 2 U.S.C. § 441b(a) by knowingly accepting corporate contributions. Furthermore, this Office recommends that the Commission find reason to believe that Bertram Associates, P and D Realty Co. and RBA Group violated 2 U.S.C. § 441b(a) by making prohibited corporate contributions to the Dole for President Committee. Along with H & W Aviation, these corporate contributions exceeded $1,000.

3. Use Of Corporate Aircraft

A candidate, candidate's agent, or person traveling on behalf of a candidate who uses an airplane which is owed or leased by a corporation, other than a corporation licensed to offer commercial services for travel in connection with a federal election must, in advance, reimburse the corporation. 11 C.F.R. § 114.9(e). In the case of travel to a city served by regularly scheduled commercial service, the reimbursement must be the first class air fare; in the case of travel to a city not served by a regularly scheduled commercial service, it must be the usual charter rate.

The audit review of the Committee's reports and records indicated that the Committee used private aircraft owned by corporations for campaign related travel. This review indicated that the Committee made 26 payments, totaling $54,264.85 to 15 corporations which were not made in advance as required by 11 C.F.R. § 114.9(e). It does not appear that these corporations were licensed to offer commercial services for travel. It also

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appears that payments for travel ranged from 1 day to 409 days after the date of travel. The audit notes that 13 of the payments, totaling $19,787.00, were made within 5 days after the dates of travel.

The following are the corporations which were reimbursed more than 5 days after the dates of travel and which received a total more than $1,000 for prior air travel:[12]

	Corporation	Amount
1.	Becon Construction Company, Inc.	$9,987.85 1,500.00
2.	Browning-Ferris Industries	630.00 1,254.00 1,280.00 2,709.00*[13] 2,414.00*
3.	Contran	1,662.00 1,571.00 1,571.00
4.	Long Lines Limited	3,880.00
5.	Owen and Associates	9,905.00[14]

The audit review of the Committee's documentation also discovered that the Committee chartered an aircraft from Becon

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12. This Office is making recommendations to pursue only those corporations which travel expenses total more than $1,000 and which received payment more than 5 days after the dates of travel.

13. *These payments were made within 5 days after the dates of travel.

14. This transaction is also discussed in the above-mentioned in-kind section.

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Construction Company, Inc. ("Becon"). The documentation indicated that Becon rendered $9,987.85 in travel services to the Committee, but that the Committee only paid $7,512.85. It is mentioned in the Committee's documentation that the difference of $2,475.00 in air fare was not authorized by the Committee, and that the difference was paid by an individual and not a corporation. The Committee has failed to offer any documentation that the $2,475.00 difference was paid by an individual and not a corporation.

It appears that the Committee has violated the Act by not reimbursing in advance 15 corporations for air travel totaling $54,264.85. It also appears that the Committee has violated the Act by accepting an in-kind contribution of $2,475.00 from Becon. This amount is included in the above-mentioned $54,264.85 total. In addition, it appears that Becon has violated the Act by making a $2,475.00 expenditure in connection with a federal election.

Therefore, the Office of the General Counsel recommends that the Commission find reason to believe the Dole for President Committee violated 2 U.S.C. § 441b(a) by failing to reimburse 15 corporations in advance for use of their aircraft and by accepting a $2,475.00 in-kind contribution from Becon Construction Company, Inc. This Office also recommends that the Commission find reason to believe that Becon Construction Company violated 2 U.S.C. § 441b(a) by making a $2,475.00 in-kind contribution as well as providing air travel without advance payment. Furthermore, this Office recommends that the Commission also find reason to believe that Browning-Ferris Industries,

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Contran, Long Lines Limited and Owen & Associates[15] violated 2 U.S.C. § 441b(a) by failing to require advance payments before providing travel on their aircraft.

D. Excessive Contributions

No person shall make contributions to any candidate with respect to any election for Federal office which, in the aggregate, exceed $1,000.00. 2 U.S.C. § 441a(a)(1)(A). No multicandidate political committee shall make contributions to any candidate and his authorized political committees with respect to any election for Federal office which, in the aggregate, exceed $5,000.00.[16] These limitations apply separately to each election, except that all elections held in any calendar year for the office of President of the United States (except a general election for such office) shall be considered to be one election. 2 U.S.C. § 441a(a)(6). No candidate or political committee shall knowingly accept any contributions in violation of these limitations. 2 U.S.C. § 441a(f).

Commission regulations explain that contributions which exceed the contribution limitations may be deposited into a

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15. The recommendation against Owen & Associates also includes the $1,000 in-kind contribution discussed above.

16. A multicandidate political committee means any committee that has been registered with the Commission for at least six months and has received contributions from more than 50 persons and, except for a state political party organization, has made contributions to five or more candidates. 2 U.S.C. § 441a(a)(4). A committee that has not met these requirements is subject to the $1,000 per election limit. Furthermore, an authorized political committee of a candidate may not contribute more than $1,000 to any other candidate for federal office regardless of whether it would otherwise meet the requirements of Section 441a(a)(4). 2 U.S.C. § 432(e)(3).

campaign depository. If any such contributions are so deposited, the treasurer may request redesignation or reattribution of the contribution by the contributor in accordance with Commission regulations. If a redesignation or reattribution is not obtained, the treasurer shall, within 60 days of the treasurer's receipt of the contribution, refund the contribution to the contributor. 11 C.F.R. § 103.3(b)(3). The regulations further provide that any contribution which appears to be illegal and which is deposited into a campaign depository shall not be used for any disbursements by the political committee until the contribution has been determined to be legal. The political committee must either establish a separate account in a campaign depository for such contributions or maintain sufficient funds to make such refunds. 11 C.F.R. § 103.3(b)(4).

1. **Apparent Excessive Contributions from Individuals**

Commission regulations provide that any contribution made by more than one person, except for a contribution made by a partnership, shall include the signature of each contributor on the check, money order, or other negotiable instrument or in a separate writing. A contribution made by more than one person that does not indicate the amount to be attributed to each contributor shall be attributed equally to each contributor. If a contribution to a candidate on its face or when aggregated with other contributions from the same contributor exceeds the limitations on contributions, the treasurer may ask the contributor whether the contribution was intended to be a joint contribution by more than one person. A contribution shall be

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considered to be reattributed to another contributor if the treasurer of the recipient political committees asks the contributor whether the contribution is intended to be a joint contribution by more than one person and informs the contributor that he or she may request the return of the excessive portion of the contribution if it is not intended to be a joint contribution and, within sixty (60) days from the date of the treasurer's receipt of the contribution, the contributors provide the treasurer with a written reattribution of the contribution, which is signed by each contributor and which indicates the amount to be attributed to each contributor if equal attribution is not intended. 11 C.F.R. § 110.1(k).

The examination and audit of the Dole for President Committee initially identified 549 contributions from 423 individuals totaling $246,187.31 that were in excess of the applicable limitations and had not been refunded, reattributed, or redesignated in a timely fashion. A list of these contributions was provided to the Committee at the exit conference. The audit also determined that the Committee had not established a separate account for the deposit of contributions which were possibly excessive or a method to monitor the amount to be kept in the Committee's accounts while the permissibility of the contributions was determined. The audit determined that the Committee appeared to have had sufficient permissible funds to have made the refunds.

These contributions included 397 contributions from 334 individuals totaling $206,670.21 which had been untimely refunded

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with the average number of days from date of deposit to date of refund being 108. An additional 139 contributions from 76 contributors totaling $32,856.60 were redesignated by the contributors and transferred to the compliance fund, but not in a timely manner. The average number of days from the date of deposit to the date of refund was 115. Four contributions from four contributors totaling $1,505.00 had been refunded but the refund checks had not cleared the Committee's account. Nine contributions from nine contributors totaling $5,155.00 had not been refunded. In response to the Interim Audit Report, the Committee provided certain information regarding the nine contributions that had not been refunded and the four refund checks that had not been cashed. The audit determination was adjusted to delete four contributions totaling $55.50.

Thus, the audit concluded that the Dole for President Committee had accepted 545 contributions in excess of the applicable limits from 419 contributors totaling $246,131.81 that were not timely refunded, redesignated or reattributed.

In addition, we note that 23 contributors made total contributions to the Dole for President Committee that exceeded their applicable limits by more than twice. They are:

	Contributor	Total Contributions
1.	Altman Brothers	$3,000
2.	Betty Ray Atkins	$2,430
3.	Mitzi Ayala	$2,500
4.	Floyd M. Ayers	$2,466
5.	Matthew N. Chapp, Jr.	$4,000
6.	Mrs. Edna M. Davol	$3,140
7.	Doris E. Freeman	$2,295
8.	Lydia Fried	$3,000
9.	Don Hall	$3,000
10.	John J. Hamilton, III	$2,025

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11. Willis S. Hesselroth	$3,000
12. John W. King	$2,500
13. Maurice A. Lancaster	$3,000
14. Katherine F. McCoy	$3,000
15. J.F. O'Shaughnessy	$2,500
16. Rebma Obermayer	$5,000
17. U.E. Patrick	$2,500
18. Lonnie Ken Pilgrim	$3,000
19. Donald H. Piser	$3,000
20. Delford M. Smith	$2,100
21. Leroy C. Tombs, Jr.	$2,350
22. Edmund S. Wartels	$3,833.33
23. Dave H. Williams	$3,000

2. Apparent Excessive Contributions from Political Committees

The examination and audit of the Committee initially determined that the Committee had accepted contributions from 13 political committees that exceeded the applicable limitations by $19,670. Four of these excessive contributions totaling $8,000.00 had been refunded but not in a timely manner. The average number of days from date of deposit to date of refund was 116. One excessive contribution totaling $2,000.00 was redesignated to the compliance fund but was not transferred in a timely manner (106 days). The remaining excessive contributions totaling $9,670 had not been refunded.

In response to the Interim Audit Report, the Committee stated it had no record of receiving 10 contributions totaling $14,120. The audit located check copies for 6 of these 10 contributions totaling $12,050.00 from the Committee's contribution batch records. The Committee conceded two contributions totaling $2,000.00 were excessive and stated a refund would be made, but to date no evidence of such refunds has been provided.

The audit further determined that four contributions totaling

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$795 were earmarked contributions. Two other contributions totaling $2,000.00 were reported by the Committee under the name of an individual, but no documentation was found to establish that they were earmarked. Two contributions totaling $1,500.00 appear excessive based on the contributing committee's reports.

Thus, the audit concluded that the Committee had accepted excessive contributions from 11 political committees totaling $18,875. The political committees making these excessive contributions and the excessive amounts are:

Committee	Excessive Amount
1. Arthur Young & CO. PAC	$2,500
2. Dallas Citizens PAC	$1,000
3. Fluor Corp. PAC	$2,000
4. Good Gov't PAC	$1,000
5. Hartford Insurance PAC	$2,000
6. Johnston for Congress	$1,000
7. Nat. Good Gov't Fund	$1,000
8. G.E. PAC	$2,000
9. Small Biz PAC	$4,000
10. Southwestern Bell PAC	$375
11. Tele-Comm. PAC	$2,000
Total	**$18,875**

The Dallas Citizens PAC terminated in 1988. Arthur Young & Company PAC is now known as Ernst & Young Los Angeles Political Action Committee.

3. Compliance Fund

Commission regulations permit a candidate to establish a legal and accounting compliance fund prior to being nominated as a major party candidate for President. 11 C.F.R. § 9003.3(a)(1)(i). Contributions which exceed the contributor's limitation for the primary election may be deposited in the

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compliance fund if the candidate obtains the contributor's redesignation of the contribution in accordance with 11 C.F.R. § 110.1. 11 C.F.R. § 9003.3(a)(1)(iii). If a candidate is not a candidate in the general election, any contribution made with respect to the general election shall be refunded, redesignated, or reattributed. 11 C.F.R. § 102.9(e). Such refunds, redesignations, and reattributions should be made within sixty (60) days from the date of the nomination for president by the party of the candidate who is not in the general election in accordance with 11 C.F.R. § 110.1(b)(3)(i).

The Dole for President Committee established a compliance fund in 1987 and registered it with the Commission. A total of $102,662.55 in funds were redesignated and transferred to the compliance fund in addition to $16,292.00 in direct contributions to the fund. Because the Republican Party nominated its candidate for President on August 17, 1988, the Committee should have refunded, redesignated, or reattributed these funds within sixty (60) days of August 17, 1988, or no later than October 16, 1988.

The fund reported $19,542.00 in refunds through September 30, 1988. In addition, letters were sent to all contributors offering them a choice of redesignating their contributions to the newly-established Penalty & Interest Fund or receiving a

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refund.[17] In response to this letter, contributors redesignated $50,814.00 to the Penalty & Interest Fund. The redesignation letters were date stamped as received back by the Committee between August 26, 1988, and September 22, 1988. Therefore, they were also made within the 60-day period.[18]

Thus, the remaining funds totaling $48,598.55 deposited into the compliance fund were not refunded or redesignated within 60 days. On January 25, 1991, the Committee submitted photocopies

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17. The letter was dated between August 9, 1988, and August 22, 1988, and signed by Scott Morgan, Chief Counsel for the Committee. It stated that the Committee had established the Penalty & Interest Fund "to pay any fines or penalties the Federal Election Commission might levy against Senator Dole and Dole for President after the completion of the FEC's current audit." The letter further noted that such a fund "is permitted under 11 C.F.R. § 9034.4(b)(4) of the Federal Election Commission regulations."

We note that this regulation provides that civil or criminal penalties paid pursuant to the Act are not qualified campaign expenses and cannot be defrayed from contributions or matching payments. The regulation further provides that any "amounts received or expended to pay such penalties shall not be considered contributions or expenditures but all amounts so received shall be subject to the prohibitions of the Act." It further adds that any "amounts received or expended under this section shall be reported in accordance with 11 CFR part 104." Although the Commission has not explicitly approved the establishment of separate penalty and interest funds, the language of the regulation would appear to permit a candidate to do so. The regulation does refer to "amounts received or expended" for the purpose of paying penalties and requires that they be reported. Since such funds are not contributions and since contributions or matching payments cannot be used to pay penalties, the establishment of a separate account would appear necessary. It would therefore follow that this separate account could register and report as a separate entity with the Commission. Moreover, transfers to such a fund from the compliance fund would also appear permissible when prior approval is first obtained from the contributor who is also given the option of requesting a refund.

18. The audit also noted that through September 30, 1988, the Penalty & Interest Fund had earned $6,035.18 in interest.

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of 105 contribution refund checks totaling $48,748.55 dated January 16 and 17, 1991.[19] Only the front of these checks were provided. Therefore, the audit could not determine whether or not these contributions had actually been refunded.[20] We note that the compliance fund reported making $41,381.50 in refunds on January 16, 1991, with remaining cash on hand of $12,544.97.[21]

4. Summary

Based on the foregoing, the Office of the General Counsel recommends that the Commission find reason to believe the Dole for President Committee violated 2 U.S.C. § 441a(f) by knowingly accepting excessive contributions from individuals totaling $246,131.81 and by knowingly accepting excessive contributions from political committees totaling $18,875 that were not redesignated, reattributed, or refunded in a timely manner, and by knowingly accepting contributions with respect to the general election through the compliance fund that were not refunded, redesignated, or reattributed within 60 days of the nomination of the Republican Party's candidate for President.

This Office further recommends that the Commission find

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19. The difference between $48,598.55 and $48,748.55 was explained by a transfer of $325 from the compliance fund to the penalty & interest fund that should have only been $175. The treasurer had stated that the $150 would be transferred back to the compliance fund. Instead, the Penalty & Interest Fund reported a $150 payment on January 30, 1991, to the Dole for President Committee as a reimbursement for accounting services.

20. The audit also noted that any refund checks that remain outstanding are governed by 11 C.F.R. 9038.6 which would require that such funds be made payable to the United States Treasury.

21. This amount appears to represent those contributions for which the Committee did not have current addresses.

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reason to believe the twenty-three (23) individuals who made excessive contributions of more than twice their limitation and four of the five (5) political committees[22] that had not qualified as multicandidate political committees and that made excessive contributions violated 2 U.S.C. § 441a(a)(1)(A) and that the six (6) multicandidate political committees that made excessive contributions violated 2 U.S.C. § 441a(a)(2)(A).

E. Delegate Committees

The Act requires that each treasurer of a political committee file reports of receipts and disbursements in accordance with the provisions of 2 U.S.C. § 434(a). 2 U.S.C. § 434(a). A principal campaign committee is required to consolidate in each of its report the reports submitted to it by any authorized committees. 11 C.F.R. § 104.3(f).

The treasurer of a committee shall keep an account of: all contributions received by or on behalf of such committee; the name and address of any person who makes any contribution in excess of $50, together with the date and amount of such contribution by any person; the identification of any person who makes a contribution or contributions aggregating more than $200 during a calendar year, together with the date and amount of any such contribution; the identification of any political committee which makes a contribution, together with the date and amount of any such contribution; and the name and address of every person to whom any disbursement is made, the date, amount, and purpose

22. No recommendation is made with respect to the Dallas Citizens PAC since it terminated in 1988.

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of the disbursement, and the name of the candidate and the office sought by the candidate, if any, for whom the disbursement was made, including a receipt, invoice, or canceled check for each disbursement in excess of $200. 2 U.S.C. § 432(c). The treasurer must preserve all the above-mentioned records and copies of all reports required to be filed by this subchapter for three years after the report is filed. 2 U.S.C. § 432(d). Political committees must maintain records, including bank records, with respect to matters required to be reported. 11 C.F.R. § 104.14(b). These records must provide, in sufficient detail, the necessary information and data from which the reports and statements may be explained, verified, and checked for accuracy and completeness. 11 C.F.R. § 104.14(b).

A candidate may designate additional political committees in accordance with 11 C.F.R. § 102.13 to serve as committees which will be authorized to accept contributions or make expenditures on behalf of the candidate. 11 C.F.R. § 101.1(b). A delegate committee is a group of persons that receives contributions or makes expenditures for the sole purpose of influencing the selection of one of more delegates to a national nominating convention. 11 C.F.R. § 110.14(b)(2). A delegate committee which qualifies as a political committee under 11 C.F.R. § 100.5 must register with the Commission and report its receipts and disbursements in accordance with 11 C.F.R. Part 104. Id.

The audit indicates that the Dole Committee failed to report certain receipts and disbursements by delegate committees in its reports to the Commission. The audit also indicates that records

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regarding these receipts and disbursements were not maintained. The funds involved were those received and disbursed by eighteen delegate committees, fifteen of which were located in Illinois and three of which were located in Maryland.

The audit reviewed the Dole Committee records for the delegate committees and the delegate committees' records, many of which were incomplete. The audit also reviewed the reports which the delegate committees filed with the Commission.[23] In order to obtain more complete information, the Commission subpoenaed the bank records of the delegate committees. Using all of the aforementioned information, the Audit department determined that the Dole Committee failed to report $27,531.83 in receipts and $42,660.10 in disbursements regarding the delegate committees.

As a principal campaign committee, the Dole Committee was responsible for consolidating the information contained in reports submitted to it by authorized committees in the Committee's reports to the Commission.[24] Most of the delegate

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23. Many of the delegate committees filed some of the required disclosure reports. However, most of the delegate committees failed to file all of the required reports.

24. Senator Dole authorized thirteen of the delegate committees by amending his statement of candidacy. In response to the Interim Audit Report, the Committee stated that "DFP had three delegate committees in Maryland and 15 in Illinois." Therefore, it appears that the Dole Committee viewed all eighteen of the delegate committees as authorized committees despite the fact that the amendments to Senator Dole's statement of candidacy do not list all of these committees. For instance, most of the Illinois delegates committees are listed as authorized. Moreover, four of the five committees not listed on Senator Dole statement of candidacy nevertheless filed statements of organizations identifying the Dole Committee as an affiliated committee. The remaining committee listed the Dole Committee treasurer as a signatory on its bank account. Therefore, we have

committees filed a few reports directly with the Commission. Nevertheless, as they were authorized committees, the Dole Committee was responsible for filing a consolidated report which included all of the delegate committees' activity. Even if the delegate committees did not submit reports to the Committee or submitted incomplete reports to the Committee, the Committee was still responsible for obtaining the information and reporting the receipts and disbursements to the Commission in a consolidated report.

Based on the foregoing, this Office recommends that the Commission find reason to believe that the Dole for President Committee violated 2 U.S.C. § 434 by failing to report the receipts and disbursements of the eighteen delegate committees in its consolidated reports.

Commission regulations provide that a principal campaign committee must file a consolidated report including the activity of all authorized committees since authorized committees do not separately file reports. Commission regulations also provide that delegate committees must register and file reports with the the Commission. 11 C.F.R. § 110.14(b)(2). Therefore, these regulations may have created some uncertainty as to whether delegate committees which are also authorized committees need to separately report. Nevertheless, this Office concludes that the general rule for principal campaign committees and authorized committees controls. Thus, this recommendation is made only with

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(Footnote 24 continued from previous page)
treated all Illinois delegate committees as authorized.

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respect to the Dole for President Committee.

The Regulations appear to make the delegate committees responsible for maintaining records regarding their receipts and disbursements for up to three years after the applicable report had been filed. Commission regulations at 11 C.F.R. § 9033.1(b)(6) provide that the candidate and his committee shall permit an examination and audit of the receipts and disbursements of all authorized committees and shall make available all records of such committees for that purpose. While this regulation places an obligation on the presidential committee to produce such records for purposes of the audit, it does not explicitly require the presidential committee to maintain such records. Instead, that requirement appears to apply only to the delegate committees themselves. In this particular situation, the eighteen delegate committees disbanded over three years ago. Therefore, we are making no recommendation regarding 2 U.S.C. § 432 and recordkeeping.

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III. RECOMMENDATIONS

1. Find reason to believe that Dole for President Committee and James L. Hagen, as treasurer, violated 2 U.S.C. §§ 434, 441a(b)(1)(A), 441a(f), and 441b and 26 U.S.C. § 9035(a).

2. Find reason to believe that Campaign America and Judith F. Taggart, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A).

3. Find reason to believe the following corporations violated 2 U.S.C. § 441b:

   a. Bertram Associates;
   b. Becon Construction Company, Inc.;
   c. Browning-Ferris Industries;
   d. Contran;
   e. H & W Aviation;
   f. Long Lines Limited;

g. Owen and Associates;
h. P and D Realty Company;
i. RBA Group;

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

a. Altman Brothers;
b. Betty Ray Atkins;
c. Mitzi Ayala;
d. Floyd M. Ayers;
e. Matthew N. Chapp, Jr.;
f. Edna M. Davol;
g. Doris E. Freeman;
h. Lydia Fried;
i. Don Hall;
j. John J. Hamilton, III;
k. Willis S. Hesselroth;
l. John W. King;
m. Maurice A. Lancaster;
n. Katherine F. McCoy;
o. J. F. O'Shaughnessy;
p. Rebma Obermayer;
q. U. E. Patrick;
r. Lonnie Ken Pilgrim;
s. Donald H. Piser;
t. Delform M. Smith;
u. Leroy C. Tombs, Jr.;
v. Edmund S. Wartels;
w. Dave H. Williams.

5. Find reason to believe the following political committees violated 2 U.S.C. § 441a(a)(1)(A):

a. Good Government Federal Political Action Committee and Neil B. Kornsweit, as treasurer;

b. Johnston for Congress and Benjamin F. Craven, Jr., as treasurer;

c. U.S. Federation of Small Businesses PAC and Carla L. Saunders, as treasurer;

d. Tele-Communications, Inc. PAC and Gary K. Bracken, as treasurer.

6. Find reason to believe the following political committees violated 2 U.S.C. § 441a(a)(2)(A):

a. Ernst & Young Los Angeles Political Action Committee and Harry D. Slaughter, as treasurer;

b. Fluor Corporation Public Affairs Committee and George H. Hessler, as treasurer;

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c. Hartford Insurance Group PAC and Robert J. Mageau, as treasurer;

d. The National Good Government Fund and Joe B. Allen, as treasurer;

e. Non-Partisan Political Support Committee (G.E.) and Helen B. Platt, as treasurer;

f. Southwestern Bell Corp. Employee Federal PAC and Donald E. Kiernan, as treasurer.

7. Approve the appropriate letters and attached Factual and Legal Analyses.

8/26/91
Date

Lawrence M. Noble
General Counsel

Attachments:
1. Audit Referral (less Exhibits E and H)
2. Factual and Legal Analyses
3. Campaign America invitation postcard
4. Dole for President Committee invitation postcard
5. Campaign America flyer
6. Talking points memorandum
7. Response to Initial Repayment Determination

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/BONNIE J. FAISON
COMMISSION SECRETARY

DATE: AUGUST 29, 1991

SUBJECT: MUR 3309 - FIRST GENERAL COUNSEL'S REPORT DATED AUGUST 26, 1991.

The above-captioned document was circulated to the Commission on TUESDAY, AUGUST 27, 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	XXX
Commissioner Elliott	XXX
Commissioner Josefiak	XXX
Commissioner McDonald	
Commissioner McGarry	
Commissioner Thomas	

This matter will be placed on the meeting agenda for TUESDAY, SEPTEMBER 17, 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 3309
Dole for President Committee and James L. Hagen, as treasurer; Campaign America and Judith F. Taggart, as treasurer; 9 Corporations; 23 Individuals; 11 Political Committees.	)	

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CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on October 29, 1991, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 3309:

1. Find reason to believe that Dole for President Committee and James L. Hagen, as treasurer, violated 2 U.S.C. §§ 434, 441a(b)(1)(A), 441a(f), and 441b and 26 U.S.C. § 9035(a).

2. Find reason to believe that Campaign America and Judith F. Taggart, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A).

(continued)

3. Find reason to believe the following corporations violated 2 U.S.C. § 441b:

a. Bertram Associates;
b. Becon Construction Company, Inc.
c. Browning-Ferris Industries;
d. Contran;
e. H & W Aviation;
f. Long Lines Limited;
g. Owen and Associates;
h. P and D Realty Company;
i. RBA Group.

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

a. Altman Brothers;
b. Betty Ray Atkins;
c. Mitzi Ayala;
d. Floyd M. Ayers;
e. Matthew N. Chapp, Jr.;
f. Edna M. Davol;
g. Doris E. Freeman;
h. Lydia Fried;
i. Don Hall;
j. John J. Hamilton, III;
k. Willis S. Hesselroth;
l. John W. King;
m. Maurice A. Lancaster;
n. Katherine F. McCoy;
o. J. F. O'Shaughnessy;
p. Rebma Obermayer;
q. U. E. Patrick;
r. Lonnie Ken Pilgrim;
s. Donald H. Piser;
t. Delform M. Smith;
u. Leroy C. Tombs, Jr.;
v. Edmund S. Wartels;
w. Dave H. Williams.

(continued)

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5. Find reason to believe the following political committees violated 2 U.S.C. § 441a(a)(1)(A):

   a. U.S. Federation of Small Businesses PAC and Carla L. Saunders, as treasurer;

   b. Tele-Communications, Inc. PAC and Gary K. Bracken, as treasurer;

6. Find reason to believe the following political committees violated 2 U.S.C. § 441a(a)(2)(A):

   a. Ernst & Young Los Angeles Political Action Committee and Harry D. Slaughter, as treasurer;

   b. Fluor Corporation Public Affairs Committee and George H. Hessler, as treasurer;

   c. Hartford Insurance Group PAC and Robert J. Mageau, as treasurer;

   d. Non-Partisian Political Support Committee (G.E.) and Helen B. Platt, as treasurer.

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

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

Attest:

11-1-91
Date

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

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

SENSITIVE

November 4, 1991

MEMORANDUM

TO: The Commission

FROM: Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

SUBJECT: Erroneous Finding in MUR 3309

On Tuesday, October 19, 1991, the Commission approved the General Counsel's recommendations contained in the First General Counsel's Report, dated August 26, 1991, in MUR 3309 (Dole for President, et al.).

Among the recommendations approved was one to find reason to believe the Non-Partisan Political Support Committee (G.E.) and Helen B. Platt, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A). This committee has a New York City address. The copies of the contribution checks that accompanied the audit referral showed that they had been written by the Non-Partisan Political Support Committee for General Electric Company Employees in Fairfield, Connecticut, and signed by Richard W. Nelson and one other individual. When staff checked the B Index, the only committee called the Non-Partisan Political Support Committee associated the General Electric that staff located was the one noted above. It has since come to our attention that the B Index also lists a General Electric Company Political Action Committee in Fairfield, Connecticut, with Richard W. Nelson, as treasurer. See Attachment 1.

Notwithstanding the differences between the name of the committee on the contribution checks and the name on the B Index, it appears that the recommendation, and thus the finding, were made against the wrong committee.

Therefore, this Office recommends that the Commission rescind the finding against the committee with Helen B. Platt, as treasurer, and instead make the reason to believe finding against the one with Richard W. Nelson, as treasurer. A revised factual and legal analysis is also attached for approval.

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RECOMMENDATIONS

1. Rescind the reason to believe finding made on October 29, 1991, that the Non-Partisan Political Support Committee (G.E.) and Helen B. Platt, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A).

2. Find reason to believe the General Electric Company Political Action Committee and Richard W. Nelson, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A).

3. Approve the attached factual and legal analysis and appropriate letter.

Attachments
1. B Index Excerpts
2. Factual and Legal Analysis

Staff person: George F. Rishel

2304095119987

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Non-Partisan Political Support Committee for (G.E.) and Helen B. Platt, as treasurer;	)	MUR 3309
	)	
General Electric Company Political Action Committee and Richard W. Nelson, as treasurer.	)	

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CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on November 6, 1991, the Commission decided by a vote of 6-0 to take the following actions in MUR 3309:

1. Rescind the reason to believe finding made on October 29, 1991, that the Non-Partisan Political Support Committee (G.E.) and Helen B. Platt, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A).

2. Find reason to believe the General Electric Company Political Action Committee and Richard W. Nelson, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A).

(Continued)

3. Approve the factual and legal analysis and appropriate letter, as recommended in the General Counsel's Memorandum dated November 4, 1991.

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

Attest:

11-7-91
Date

Delores Harris
for Marjorie W. Emmons
Secretary of the Commission

Received in the Secretariat: Mon., Nov. 4, 1991 1:08 p.m.
Circulated to the Commission: Mon., Nov. 4, 1991 4:00 p.m.
Deadline for vote: Wed., Nov. 6, 1991 4:00 p.m.

dr

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FEDERAL ELECTION COMMISSION
WASHINGTON D C 20463

November 21, 1991

Judith F. Taggart, Treasurer
Campaign America
511 Capitol Court, N.E.
Washington, D.C. 20002

RE: MUR 3309

Dear Ms. Taggart:

On October 29, 1991, the Federal Election Commission found that there is reason to believe Campaign America ("the Committee") and you, as treasurer, violated 2 U.S.C. § 441(a)(2)(A), 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 the Committee and you, as treasurer. 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 the Committee and you, as treasurer, 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

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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.

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 enclosed a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Anne A. Weissenborn, the attorney assigned to this matter, at (202) 219-3400.

Sincerely,

John Warren McGarry

John Warren McGarry
Chairman

Enclosures

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENTS: Campaign America and Judith F. Taggart, as treasurer **MUR:** 3309

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. 2 U.S.C. § 437g(a)(2). It is based on the audit of the Dole for President Committee ("Dole Committee") pursuant to 26 U.S.C. § 9038(a).

No multi-candidate political committee shall make contributions to any candidate and his authorized political committee with respect to any election for Federal office which, in the aggregate, exceed $5,000.00. 2 U.S.C. § 441a(a)(2)(A) and 11 C.F.R. § 110.2(a)(1),

Funds received and payments made solely for the purpose of determining whether an individual should become a candidate are not contributions or expenditures for purposes of the Act. Examples of activities permissible under this exemption include, but are not limited to, conducting a poll, telephone calls, and travel. If the individual subsequently becomes a candidate, the funds received and expended would become contributions subject to the reporting requirements of the Act. 11 C.F.R. §§ 100.7(b)(1), 100.8(b)(1), and 101.3.

The Commission has addressed the issue of testing the waters in Advisory Opinion ("AO") 1985-40 and Advisory Opinion 1986-6, both of which concerned an unauthorized political

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committee associated with a prospective presidential candidate. In AO 1985-40, the Commission concluded that expenses paid by an unauthorized political committee for an individual considering whether to become a candidate would be considered testing the waters expenses, if such activities related to the potential candidacy and that individual subsequently became a candidate. Such expenditures would be deemed qualified campaign expenses and would be subject to the candidate's expenditure limitations under 2 U.S.C. § 441a(b). In AO 1986-6, the Commission determined that expenditures made for testing the waters purposes must be treated as in-kind contributions to the candidate.

Campaign America is a registered multi-candidate committee associated with the candidate.[1] According to a Campaign America newsletter, Senator Dole is the "Honorary Chairman" of Campaign America.

A review of Campaign America records made available in response to a subpoena issued during the audit of the Dole Committee revealed that at least 19 Campaign America-sponsored events, speeches, or meetings were held in Iowa between March 31, 1986, and February 23, 1987. Four of these events were apparently testing the waters expenditures made by Campaign America on behalf of the Committee: (1) a February 7, 1987, town meeting in Orange City, Iowa; (2) a February 12, 1987, town

1. Campaign America registered with the Commission in March 1978.

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meeting in Dubuque, Iowa; (3) a February 22, 1987, town meeting in Des Moines, Iowa; and (4) a February 23, 1987, breakfast meeting in Davenport, Iowa. The costs associated with the four events totaled $14,684.35.

These four events appear to have been similar to the events of the same name sponsored by the Dole committee. Invitation postcards for the town meetings sponsored by the Dole committee and by Campaign America were printed by the same Iowa firm and employed the same format and picture. The postcard for the February 22, 1987, event began with the message, "With the 1986 campaign behind us, Republican voters and candidates clearly have major challenges ahead in 1988. During this meeting I would like to hear your views and concerns while sharing some of my own with you regarding our shared Republican future."[2] The printing bill for the February 22 postcards also covered a flyer entitled "Bob Dole on the Issues" which contained the quotation, "If Senator Dole is running for the White House, he's off on the right foot."

Campaign America also supplied the Commission with a memorandum dated February 18, 1987, from Beverly Hubble to Senator Dole containing "Iowa talking points." The talking points memorandum begins with a section entitled "Quad Cities Issues." On February 23, 1987, Campaign America paid for the above-cited breakfast meeting for 53 people in Davenport, Iowa,

2. No samples of the other postcard invitations are available.

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one of the Quad Cities.[3] Also included in this memo was a section entitled "Offer Iowans a Friend in the White House," which read, "If the candidates are confronted with the question: How should your PAST commitments assure IOWANS that if you are elected Iowa will have a friend in the White House . . . . It's likely NO ONE could answer that challenge as effectively as *RFD*. So we should make sure that question is asked . . . and asked . . . and asked."

In addition to finding that the $14,684.35 in Campaign America expenditures for the four events consisted of allocable testing the waters payments, the Commission has determined that Campaign America staff expenses associated with the same events were likewise allocable testing the waters payments and thus allocable. These expenditures totaled $10,214.70.

Campaign America also paid a firm $8,010.67 to purchase and edit an Iowa Republican voter tape previously compiled at Campaign America's expense, to print labels, to keypunch telephone canvas card data, to update the master file with survey data, and to print selected "Dole favorable" labels. In addition, Campaign America paid the same vendor $979.60 for selecting and printing Dole favorables, for computer tapes of Dole favorables, and for selecting and printing labels for persons in selected Iowa counties. It appears from the invoices that the survey data was used with respect to Campaign America events in Iowa in January and February 1987. The Dole committee

3. The Quad Cities are comprised of the following: Davenport, IA; Bettendorf, IA; Moline, IL; and Rock Island, IL.

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used the same vendor for its own activities.

A review of Campaign America records also revealed 117 payments in New Hampshire totaling $3,136.26 to various towns for voter lists in late 1986 and early 1987, plus $2,223.16 in telephone costs for a business telephone, the number of which was later used by the Dole committee and $1,381.03 of which cost was allocable to New Hampshire. The Commission has deemed these costs testing the waters expenditures made by Campaign America on behalf of Dole for President.

As testing the waters expenditures, the above Campaign America payments became in-kind contributions to the Dole committee which were subject to the $5,000.00 limitation at 2 U.S.C. § 441a(a)(2)(A). Campaign America expenditures totaled $38,406.61, or $33,406.61 in excess of the limitation. Therefore, there is reason to believe that Campaign America violated 2 U.S.C. § 441a(a)(2)(A).

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 21, 1991

Larry Pantirer
Bertram Associates
1001 Bertram Terrace
Union, NJ 07083

RE: MUR 3309
Bertram Associates

Dear Mr. Pantirer:

On October 29, 1991, the Federal Election Commission found that there is reason to believe Bertram Associates violated 2 U.S.C. § 441b, 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 along with answers to the enclosed questions 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 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. 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.

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 Lawrence D. Parrish, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

John Warren McGarry
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

Respondent: Bertram Associates MUR: 3309

I. GENERATION OF MATTER

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. 2 U.S.C. § 437g(a)(2). It is based on the audit of the Dole for President Committee pursuant to 26 U.S.C. § 9038(a).

II. FACTUAL AND LEGAL ANALYSIS

A. Prohibited Contributions

It is unlawful for any corporation to make a contribution or expenditure in connection with any election to any political office, or in connection with any primary election or political convention or caucus held to select candidates for any political office, or for any corporation whatever to make a contribution or expenditure in connection with any election at which presidential and vice presidential electors or a Senator or Representative in, or a Delegate or Resident Commissioner to, Congress are to be voted for, or in connection with any primary election or political convention or caucus held to select candidates for any of the foregoing offices. 2 U.S.C. § 441b(a).

A review of the Dole for President Committee (the "DPC") records and reports indicated that on or about December 3, 1987, DPC received a contribution of $2,000.00 from Bertram

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Associates. The check submitted to DPC indicated that the $2,000.00 contribution was drawn on a corporate account. Furthermore, the New Jersey Secretary of State provided the Commission with information which indicated that Bertram Associates is a corporation. The DPC did not provide any information which demonstrated that Bertram Associates was not a corporation. Based upon the foregoing, it appears that Bertram Associates has violated 2 U.S.C. § 441b by making a prohibited corporate contribution to the Dole for President Committee.

Therefore, there is reason to believe that Bertram Associates violated 2 U.S.C. § 441b(a).

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 21, 1991

J.M. Komes, President
Becon Construction Company, Inc.
Southeast Headquaters
4651 Charlotte Park Drive
Building One - Suite 200
Charlotte, NC 28210

RE: MUR 3309
Becon Construction Company

Dear Mr. Komes:

On October 29, 1991, the Federal Election Commission found that there is reason to believe Becon Construction Company violated 2 U.S.C. § 441b, 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 along with answers to the enclosed questions 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 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. 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.

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 Lawrence D. Parrish, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

John Warren McGarry

John Warren McGarry
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

Respondent: Becon Construction Company, Inc. MUR: 3309

I. GENERATION OF MATTER

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. 2 U.S.C. § 437g(a)(2). It is based on the audit of the Dole for President Committee pursuant to 26 U.S.C. § 9038(a).

II. FACTUAL AND LEGAL ANALYSIS

A. Use Of Corporation Aircraft

It is unlawful for any corporation to make a contribution or expenditure in connection with any election to any political office, or in connection with any primary election or political convention or caucus held to select candidates for any political office, or for any corporation whatever to make a contribution or expenditure in connection with any election at which presidential and vice presidential electors or a Senator or Representative in, or a Delegate or Resident Commissioner to, Congress are to be voted for, or in connection with any primary election or political convention or caucus held to select candidates for any of the foregoing offices. 2 U.S.C. § 441b(a).

A candidate, candidate's agent, or person traveling on behalf of a candidate who uses an airplane which is owed or leased by a corporation, other than a corporation licensed to

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offer commercial services for travel in connection with a Federal election must, in advance, reimburse the corporation. 11 C.F.R. § 114.9(e). In the case of travel to a city served by regularly scheduled commercial service, the reimbursement must be the first class air fare; in the case of travel to a city not served by a regularly scheduled commercial service, it must be the usual charter rate.

A review of the Dole for President Committee's (the "DPC") records and reports indicated that from January 18, 1988 through March 8, 1988, the DPC used private aircraft owned by Becon Construction Company, Inc. ("Becon"), for campaign related travel. This review indicated that the DPC made payments of $7,512.85 and $1,500, totaling $9,012.85, to Becon which were not made in advance as required by 11 C.F.R. § 114.9(e). The Committee's documentation also indicated that Becon rendered $11,487.85 in travel services to the DPC, but the DPC only paid $9,012.85. The DPC did not offer any documentation which showed that the $2,475.00 difference was paid to Becon. It does not appear that Becon was licensed to offer commercial services for travel.

It appears that Becon is in violation of the Act, by making a $2,475 in-kind contribution as well as providing air travel without advance payment, thus constituting corporate expenditures by them.

Therefore, there is reason to believe that Becon Construction Company, Inc., violated 2 U.S.C. § 441b(a).

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 21, 1991

Bob Price
Browning-Ferris Industries
1150 Connecticut Ave., N.W.
Washington, DC 20036

RE: MUR 3309
Browning-Ferris Industries

Dear Mr. Price:

On October 29, 1991, the Federal Election Commission found that there is reason to believe Browning-Ferris Industries violated 2 U.S.C. § 441b, 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 along with answers to the enclosed questions 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 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. 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.

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 Lawrence D. Parrish, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

John Warren McGarry

John Warren McGarry
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

Respondent: Browning-Ferris Industries MUR: 3309

I. GENERATION OF MATTER

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. 2 U.S.C. § 437g(a)(2). It is based on the audit of the Dole for President Committee pursuant to 26 U.S.C. § 9038(a).

II. FACTUAL AND LEGAL ANALYSIS

A. Use Of Corporation Aircraft

It is unlawful for any corporation to make a contribution or expenditure in connection with any election to any political office, or in connection with any primary election or political convention or caucus held to select candidates for any political office, or for any corporation whatever to make a contribution or expenditure in connection with any election at which presidential and vice presidential electors or a Senator or Representative in, or a Delegate or Resident Commissioner to, Congress are to be voted for, or in connection with any primary election or political convention or caucus held to select candidates for any of the foregoing offices. 2 U.S.C. § 441b(a).

A candidate, candidate's agent, or person traveling on behalf of a candidate who uses an airplane which is owed or leased by a corporation, other than a corporation licensed to

offer commercial services for travel in connection with a Federal election must, in advance, reimburse the corporation. 11 C.F.R. § 114.9(e). In the case of travel to a city served by regularly scheduled commercial service, the reimbursement must be the first class air fare; in the case of travel to a city not served by a regularly scheduled commercial service, it must be the usual charter rate.

A review of the Dole for President Committee (the "DPC") records and reports indicated that from May 1, 1987 through November 18, 1987, the DPC used private aircraft owned by Browning-Ferris Industries for campaign related travel. This review indicated that the DPC made 5 payments, totaling $7,657.00 to Browning-Ferris Industries which were not made in advance as required by 11 C.F.R. § 114.9(e). It does not appear that Browning-Ferris Industries was licensed to offer commercial services for travel.

It appears that Browning-Ferris Industries is in violation of the Act, by failing to require payments before providing travel on their aircraft, thus constituting corporate expenditures by them.

Therefore, there is reason to believe that Browning-Ferris Industries violated 2 U.S.C. § 441b(a).

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FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

November 21, 1991

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

RE: MUR 3309
Contran

Dear Mr. Simmons:

On October 29, 1991, the Federal Election Commission found that there is reason to believe Contran violated 2 U.S.C. § 441b, 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 along with answers to the enclosed questions 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 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. 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.

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 Lawrence D. Parrish, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

John Warren McGarry
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

Respondent: Contran Corporation MUR: 3309

I. GENERATION OF MATTER

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. 2 U.S.C. § 437g(a)(2). It is based on the audit of the Dole for President Committee pursuant to 26 U.S.C. § 9038(a).

II. FACTUAL AND LEGAL ANALYSIS

A. Use Of Corporation Aircraft

It is unlawful for any corporation to make a contribution or expenditure in connection with any election to any political office, or in connection with any primary election or political convention or caucus held to select candidates for any political office, or for any corporation whatever to make a contribution or expenditure in connection with any election at which presidential and vice presidential electors or a Senator or Representative in, or a Delegate or Resident Commissioner to, Congress are to be voted for, or in connection with any primary election or political convention or caucus held to select candidates for any of the foregoing offices. 2 U.S.C. § 441b(a).

A candidate, candidate's agent, or person traveling on behalf of a candidate who uses an airplane which is owed or leased by a corporation, other than a corporation licensed to

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offer commercial services for travel in connection with a Federal election must, in advance, reimburse the corporation. 11 C.F.R. § 114.9(e). In the case of travel to a city served by regularly scheduled commercial service, the reimbursement must be the first class air fare; in the case of travel to a city not served by a regularly scheduled commercial service, it must be the usual charter rate.

A review of the Dole for President Committee (the "DPC") records and reports indicated that from January, 1988 through March 14, 1988, the DPC used private aircraft owned by Contran Corporation for campaign related travel. This review indicated that the DPC made 3 payments totaling $4,804.00 to Contran Corporation which were not made in advance as required by 11 C.F.R. § 114.9(e). It does not appear that Contran Corporation was licensed to offer commercial services for travel.

It appears that Contran Corporation is in violation of the Act, by failing to require payments before providing travel on their aircraft, thus constituting corporate expenditures by them.

Therefore, there is reason to believe that Contran Corporation violated 2 U.S.C. § 441b(a).

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 21, 1991

Geraldine A. Price
H & W Aviation
9400 North Broadway 1700
Oklahoma, OK 73114

RE: MUR 3309
H & W Aviation

Dear Mr. Price:

On October 29, 1991, the Federal Election Commission found that there is reason to believe H & W Aviation violated 2 U.S.C. § 441b, 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 along with answers to the enclosed questions 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 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. 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.

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 Lawrence D. Parrish, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

John Warren McGarry

John Warren McGarry
Chairman

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93040952015

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

Respondent: H & W Aviation MUR: 3309

I. GENERATION OF MATTER

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. 2 U.S.C. § 437g(a)(2). It is based on the audit of the Dole for President Committee pursuant to 26 U.S.C. § 9038(a).

II. FACTUAL AND LEGAL ANALYSIS

A. In-Kind Corporate Contribution

It is unlawful for any corporation to make a contribution or expenditure in connection with any election to any political office, or in connection with any primary election or political convention or caucus held to select candidates for any political office, or for any corporation whatever to make a contribution or expenditure in connection with any election at which presidential and vice presidential electors or a Senator or Representative in, or a Delegate or Resident Commissioner to, Congress are to be voted for, or in connection with any primary election or political convention or caucus held to select candidates for any of the foregoing offices. 2 U.S.C. § 441b(a).

The review of the Dole for President Committee's (the "DPC") vendor records indicated that the DPC made a payment of $12,000 to H & W Aviation for use of a chartered aircraft. This

amount appears to be $2,750 less than the fair market price for the services provided. A letter from H & W Aviation stated that the $12,000 paid to H & W Aviation was a discount from the standard price and was reached as a compromise between the $14,750 price and the "partners" price of $12,000. A review of the documentation in this matter failed to present any evidence which would indicate that the amount paid was not a discount. The DPC did not submit any documentation evidencing its contention that the $12,000 represents the fair market value for the services provided. Thus, it appears that the $2,750.00 discount from H & W Aviation would constitute an in-kind contribution from a corporation in violation of the Act.

Therefore, there is reason to believe that H & W Aviation violated 2 U.S.C. § 441b(a).

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FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

November 21, 1991

Jon Winkel
Long Lines Limited
504 4th Street
Sqt. Bluffs, Iowa 51054

RE: MUR 3309
Long Lines Limited

Dear Mr. Winkel:

On October 29, 1991, the Federal Election Commission found that there is reason to believe Long Lines Limited violated 2 U.S.C. § 441b, 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 along with answers to the enclosed questions 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 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. 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.

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 Lawrence D. Parrish, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

John Warren McGarry

John Warren McGarry
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

Respondent: Long Lines Limited MUR: 3309

I. GENERATION OF MATTER

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. 2 U.S.C. § 437g(a)(2). It is based on the audit of the Dole for President Committee pursuant to 26 U.S.C. § 9038(a).

II. FACTUAL AND LEGAL ANALYSIS

A. Use Of Corporation Aircraft

It is unlawful for any corporation to make a contribution or expenditure in connection with any election to any political office, or in connection with any primary election or political convention or caucus held to select candidates for any political office, or for any corporation whatever to make a contribution or expenditure in connection with any election at which presidential and vice presidential electors or a Senator or Representative in, or a Delegate or Resident Commissioner to, Congress are to be voted for, or in connection with any primary election or political convention or caucus held to select candidates for any of the foregoing offices. 2 U.S.C. § 441b(a).

A candidate, candidate's agent, or person traveling on behalf of a candidate who uses an airplane which is owed or leased by a corporation, other than a corporation licensed to

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offer commercial services for travel in connection with a Federal election must, in advance, reimburse the corporation. 11 C.F.R. § 114.9(e). In the case of travel to a city served by regularly scheduled commercial service, the reimbursement must be the first class air fare; in the case of travel to a city not served by a regularly scheduled commercial service, it must be the usual charter rate.

A review of the Dole for President Committee's (the "DPC") records and reports indicated that from December 23, 1987 through December 24, 1987, the DPC used private aircraft owned by Long Lines Limited for campaign related travel. This review indicated that the DPC made a $3,880.00 payment to Long Lines Limited which was not made in advance as required by 11 C.F.R. § 114.9(e). It does not appear that Long Lines Limited was licensed to offer commercial services for travel.

It appears that Long Lines Limited is in violation of the Act, by failing to require payments before providing travel on their aircraft, thus constituting corporate expenditures by them.

Therefore, there is reason to believe that Long Lines Limited violated 2 U.S.C. § 441b(a).

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 21, 1991

David C. Owen
Owen and Associtates
11827 West 112th Street
Suite 102
Overland Park, NJ 66210

RE: MUR 3309
Owen and Associtates

Dear Mr. Owen:

On October 29, 1991, the Federal Election Commission found that there is reason to believe Owen and Associtates violated 2 U.S.C. § 441b, 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 along with answers to the enclosed questions 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 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. 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.

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 Lawrence D. Parrish, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

John Warren McGarry

John Warren McGarry
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

Respondent: Owen and Associates MUR: 3309

I. GENERATION OF MATTER

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. 2 U.S.C. § 437g(a)(2). It is based on the audit of the Dole for President Committee pursuant to 26 U.S.C. § 9038(a).

II. FACTUAL AND LEGAL ANALYSIS

A. In-Kind Corporate Contribution

It is unlawful for any corporation to make a contribution or expenditure in connection with any election to any political office, or in connection with any primary election or political convention or caucus held to select candidates for any political office, or for any corporation whatever to make a contribution or expenditure in connection with any election at which presidential and vice presidential electors or a Senator or Representative in, or a Delegate or Resident Commissioner to, Congress are to be voted for, or in connection with any primary election or political convention or caucus held to select candidates for any of the foregoing offices. 2 U.S.C. § 441b(a).

A candidate, candidate's agent, or person traveling on behalf of a candidate who uses an airplane which is owed or leased by a corporation, other than a corporation licensed to

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offer commercial services for travel in connection with a Federal election must, in advance, reimburse the corporation. 11 C.F.R. § 114.9(e). In the case of travel to a city served by regularly scheduled commercial service, the reimbursement must be the first class air fare; in the case of travel to a city not served by a regularly scheduled commercial service, it must be the usual charter rate.

A review of the Dole for President Committee's (the "DPC)" vendor records also indicated that the DPC made a total reimbursement of $9,905.00 to Owen and Associates for use of a private airplane. This amount appears to be $1,000 less than the usual and normal charge for the service of the airplane. It appears from the evidence on hand that the charter rate for the aircraft was $150.00 per hour and that the DPC used 72.7 hours. Therefore the actual total due for the use of the aircraft was $10,905 ($150.00 X 72.7 hours = $10,905). The DPC did not proffer any documentation which evidence the payment of the $1,000 difference. Therefore, it appears that the $1,000 reduction from the usual and normal charge for the service of Owen and Associates' aircraft would constitute an in-kind contribution from a corporation in violation of the Act.

This review also indicated that DPC's payments to Owen and Associates, totaling $9,905.00, were not made in advance as required by 11 C.F.R. § 114.9(e). It does not appear that Owen and Associates was licensed to offer commercial services for travel. It appears that Owen and Associates is in violation of the Act, by failing to require payments before providing travel

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on their aircraft, thus constituting corporate expenditures by them.

Therefore, there is reason to believe that Owen and Associates violated 2 U.S.C. § 441b(a).

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FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

November 21, 1991

P and D Realty Company
28 Roxbury Hall
Succasunna, NJ 07876

RE: MUR 3309
P and D Realty Company

Dear Sir:

On October 29, 1991, the Federal Election Commission found that there is reason to believe P and D Realty Company violated 2 U.S.C. § 441b, 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 along with answers to the enclosed questions 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 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. 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.

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 Lawrence D. Parrish, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

John Warren McGarry

John Warren McGarry
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

Respondent: P and D Realty Co. MUR: 3309

I. GENERATION OF MATTER

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. 2 U.S.C. § 437g(a)(2). It is based on the audit of the Dole for President Committee pursuant to 26 U.S.C. § 9038(a).

II. FACTUAL AND LEGAL ANALYSIS

A. Prohibited Contributions

It is unlawful for any corporation to make a contribution or expenditure in connection with any election to any political office, or in connection with any primary election or political convention or caucus held to select candidates for any political office, or for any corporation whatever to make a contribution or expenditure in connection with any election at which presidential and vice presidential electors or a Senator or Representative in, or a Delegate or Resident Commissioner to, Congress are to be voted for, or in connection with any primary election or political convention or caucus held to select candidates for any of the foregoing offices. 2 U.S.C. § 441b(a).

A review of the Dole for President Committee (the "DPC") records and reports indicated that on or about November 11, 1987, DPC received a contribution of $2,000.00 from P and D

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Realty Co. The check submitted to DPC indicated that the $2,000.00 contribution was drawn on a corporate account. Furthermore, the New Jersey Secretary of State provided the Commission with information which indicated that Bertram Associates is a corporation. The DPC did not provide any information which demonstrated that P and D Realty Co. was not a corporation. Based upon the foregoing, it appears that P and D Realty Co. violated 2 U.S.C. § 441b by making a prohibited corporate contribution to the Dole for President Committee.

Therefore, there is reason to believe that P and D Realty Co. violated 2 U.S.C. § 441b(a).

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FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

November 21, 1991

William Garro
RBA Group
1 Evergreen Place
Morristown, NJ 07962-1927

RE: MUR 3309
RBA Group

Dear Mr. Garro:

On October 29, 1991, the Federal Election Commission found that there is reason to believe RBA Group violated 2 U.S.C. § 441b, 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 along with answers to the enclosed questions 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 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. 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.

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 enclosed a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 219-3690.

Sincerely,

John Warren McGarry

John Warren McGarry
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

Respondent: RBA Group MUR: 3309

I. GENERATION OF MATTER

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. 2 U.S.C. § 437g(a)(2). It is based on the audit of the Dole for President Committee pursuant to 26 U.S.C. § 9038(a).

II. FACTUAL AND LEGAL ANALYSIS

A. Prohibited Contributions

It is unlawful for any corporation to make a contribution or expenditure in connection with any election to any political office, or in connection with any primary election or political convention or caucus held to select candidates for any political office, or for any corporation whatever to make a contribution or expenditure in connection with any election at which presidential and vice presidential electors or a Senator or Representative in, or a Delegate or Resident Commissioner to, Congress are to be voted for, or in connection with any primary election or political convention or caucus held to select candidates for any of the foregoing offices. 2 U.S.C. § 441b(a).

A review of the Dole for President Committee (the "DPC") records and reports indicated that on or about December 2, 1987, DPC received a contribution of $2,000.00 from RBA Group. The

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check submitted to DPC indicated that the $2,000.00 contribution was drawn on a corporate account. Furthermore, the New Jersey Secretary of State provided the Commission with information which indicated that RBA Group is a corporation. The DPC did not provide any information which demonstrated that RBA Group was not a corporation. Based upon the foregoing, it appears that RBA Group has violated 2 U.S.C. § 441b by making a prohibited corporate contribution to the Dole for President Committee.

Therefore, there is reason to believe that RBA Group violated 2 U.S.C. § 441b(a).

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 21, 1991

Altman Brothers
115 New Street
Glenside, PA 19038

RE: MUR 3309

Dear Gentlemen:

On October 29, 1991, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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 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. 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.

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 enclosed a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 219-3690.

Sincerely,

John Warren McGarry

John Warren McGarry
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Altman Brothers **MUR:** 3309

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities, 2 U.S.C. § 437g(a)(2). It is based on the audit of the Dole for President Committee pursuant to 26 U.S.C. § 9038(a).

No person shall make contributions to any candidate with respect to any election for Federal office which, in the aggregate, exceed $1,000.00. 2 U.S.C. § 441a(a)(1)(A). These limitations apply separately to each election, except that all elections held in any calendar year for the office of President of the United States (except a general election for such office) shall be considered to be one election. 2 U.S.C. § 441a(a)(6). No candidate or political committee shall knowingly accept any contributions in violation of these limitations. 2 U.S.C. § 441a(f).

Commission regulations explain that contributions which exceed the contribution limitations may be deposited into a campaign depository. If any such contributions are so deposited, the treasurer may request redesignation or reattribution of the contribution by the contributor in accordance with Commission regulations. If a redesignation or reattribution is not obtained, the treasurer shall, within 60 days of the treasurer's receipt of the contribution, refund the contribution to the

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contributor. 11 C.F.R. § 103.3(b)(3).

Commission regulations provide that any contribution made by more than one person, except for a contribution made by a partnership, shall include the signature of each contributor on the check, money order, or other negotiable instrument or in a separate writing. A contribution made by more than one person that does not indicate the amount to be attributed to each contributor shall be attributed equally to each contributor. If a contribution to a candidate on its face or when aggregated with other contributions from the same contributor exceeds the limitations on contributions, the treasurer may ask the contributor whether the contribution was intended to be a joint contribution by more than one person. A contribution shall be considered to be reattributed to another contributor if the treasurer of the recipient political committees asks the contributor whether the contribution is intended to be a joint contribution by more than one person and informs the contributor that he or she may request the return of the excessive portion of the contribution if it is not intended to be a joint contribution and, within sixty (60) days from the date of the treasurer's receipt of the contribution, the contributors provide the treasurer with a written reattribution of the contribution, which is signed by each contributor and which indicates the amount to be attributed to each contributor if equal attribution is not intended. 11 C.F.R. § 110.1(k).

The examination and audit of the Dole For President Committee revealed that the Respondent had made contributions to the

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Committee that aggregated $3,000 and which were not redesignated to another election, reattributed to a spouse or other person, or refunded within 60 days of their receipt by the Committee. Thus, these contributions exceeded the $1,000 limitation for contributions to candidates for President of the United States.

Therefore, there is reason to believe Altman Brothers has violated 2 U.S.C. § 441a(a)(1)(A).

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 21,1991

Betty Ray Atkins
21 Canaan Close
New Canaan, CT 06840

RE: MUR 3309

Dear Ms. Atkins:

On October 29, 1991, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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 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. 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.

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 enclosed a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 219-3690.

Sincerely,

John Warren McGarry
Chairman

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23040952040

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Betty Ray Atkins **MUR:** 3309

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. 2 U.S.C. § 437g(a)(2). It is based on the audit of the Dole for President Committee pursuant to 26 U.S.C. § 9038(a).

No person shall make contributions to any candidate with respect to any election for Federal office which, in the aggregate, exceed $1,000.00. 2 U.S.C. § 441a(a)(1)(A). These limitations apply separately to each election, except that all elections held in any calendar year for the office of President of the United States (except a general election for such office) shall be considered to be one election. 2 U.S.C. § 441a(a)(6). No candidate or political committee shall knowingly accept any contributions in violation of these limitations. 2 U.S.C. § 441a(f).

Commission regulations explain that contributions which exceed the contribution limitations may be deposited into a campaign depository. If any such contributions are so deposited, the treasurer may request redesignation or reattribution of the contribution by the contributor in accordance with Commission regulations. If a redesignation or reattribution is not obtained, the treasurer shall, within 60 days of the treasurer's receipt of the contribution, refund the contribution to the

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contributor. 11 C.F.R. § 103.3(b)(3).

Commission regulations provide that any contribution made by more than one person, except for a contribution made by a partnership, shall include the signature of each contributor on the check, money order, or other negotiable instrument or in a separate writing. A contribution made by more than one person that does not indicate the amount to be attributed to each contributor shall be attributed equally to each contributor. If a contribution to a candidate on its face or when aggregated with other contributions from the same contributor exceeds the limitations on contributions, the treasurer may ask the contributor whether the contribution was intended to be a joint contribution by more than one person. A contribution shall be considered to be reattributed to another contributor if the treasurer of the recipient political committees asks the contributor whether the contribution is intended to be a joint contribution by more than one person and informs the contributor that he or she may request the return of the excessive portion of the contribution if it is not intended to be a joint contribution and, within sixty (60) days from the date of the treasurer's receipt of the contribution, the contributors provide the treasurer with a written reattribution of the contribution, which is signed by each contributor and which indicates the amount to be attributed to each contributor if equal attribution is not intended. 11 C.F.R. § 110.1(k).

The examination and audit of the Dole For President Committee revealed that the Respondent had made contributions to the

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Committee that aggregated $2,430 and which were not redesignated to another election, reattributed to a spouse or other person, or refunded within 60 days of their receipt by the Committee. Thus, these contributions exceeded the $1,000 limitation for contributions to candidates for President of the United States.

Therefore, there is reason to believe Betty Ray Atkins has violated 2 U.S.C. § 441a(a)(1)(A).

9304095200 43

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

November 21, 1991

Mitzi Ayala
744 Lake Terrace Circle
Davis, CA 95616

RE: MUR 3309

Dear Ms. Ayala:

On October 29, 1991, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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 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. 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.

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 enclosed a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 219-3690.

Sincerely,

John Warren McGarry
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Mitzi Ayala **MUR:** 3309

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. 2 U.S.C. § 437(a)(2). It is based on the audit of the Dole for President Committee pursuant to 26 U.S.C. § 9038(a).

No person shall make contributions to any candidate with respect to any election for Federal office which, in the aggregate, exceed $1,000.00. 2 U.S.C. § 441a(a)(1)(A). These limitations apply separately to each election, except that all elections held in any calendar year for the office of President of the United States (except a general election for such office) shall be considered to be one election. 2 U.S.C. § 441a(a)(6). No candidate or political committee shall knowingly accept any contributions in violation of these limitations. 2 U.S.C. § 441a(f).

Commission regulations explain that contributions which exceed the contribution limitations may be deposited into a campaign depository. If any such contributions are so deposited, the treasurer may request redesignation or reattribution of the contribution by the contributor in accordance with Commission regulations. If a redesignation or reattribution is not obtained, the treasurer shall, within 60 days of the treasurer's receipt of the contribution, refund the contribution to the

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contributor. 11 C.F.R. § 103.3(b)(3).

Commission regulations provide that any contribution made by more than one person, except for a contribution made by a partnership, shall include the signature of each contributor on the check, money order, or other negotiable instrument or in a separate writing. A contribution made by more than one person that does not indicate the amount to be attributed to each contributor shall be attributed equally to each contributor. If a contribution to a candidate on its face or when aggregated with other contributions from the same contributor exceeds the limitations on contributions, the treasurer may ask the contributor whether the contribution was intended to be a joint contribution by more than one person. A contribution shall be considered to be reattributed to another contributor if the treasurer of the recipient political committees asks the contributor whether the contribution is intended to be a joint contribution by more than one person and informs the contributor that he or she may request the return of the excessive portion of the contribution if it is not intended to be a joint contribution and, within sixty (60) days from the date of the treasurer's receipt of the contribution, the contributors provide the treasurer with a written reattribution of the contribution, which is signed by each contributor and which indicates the amount to be attributed to each contributor if equal attribution is not intended. 11 C.F.R. § 110.1(k).

The examination and audit of the Dole For President Committee revealed that the Respondent had made contributions to the

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Committee that aggregated $2,500 and which were not redesignated to another election, reattributed to a spouse or other person, or refunded within 60 days of their receipt by the Committee. Thus, these contributions exceeded the $1,000 limitation for contributions to candidates for President of the United States.

Therefore, there is reason to believe Mitzi Ayala has violated 2 U.S.C. § 441a(a)(1)(A).

23040952048

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

November 21, 1991

Floyd M. Ayers
19838 Encino Brook Street
San Antonio, TX 78359

RE: MUR 3309

Dear Mr. Ayers:

On October 29, 1991, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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 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. 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.

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 enclosed a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 219-3690.

Sincerely,

John Warren McGarry
Chairman

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2304095250

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Floyd M. Ayers **MUR:** 3309

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. 2 U.S.C. § 437(a)(2). It is based on the audit of the Dole for President Committee pursuant to 26 U.S.C. § 9038(a).

No person shall make contributions to any candidate with respect to any election for Federal office which, in the aggregate, exceed $1,000.00. 2 U.S.C. § 441a(a)(1)(A). These limitations apply separately to each election, except that all elections held in any calendar year for the office of President of the United States (except a general election for such office) shall be considered to be one election. 2 U.S.C. § 441a(a)(6). No candidate or political committee shall knowingly accept any contributions in violation of these limitations. 2 U.S.C. § 441a(f).

Commission regulations explain that contributions which exceed the contribution limitations may be deposited into a campaign depository. If any such contributions are so deposited, the treasurer may request redesignation or reattribution of the contribution by the contributor in accordance with Commission regulations. If a redesignation or reattribution is not obtained, the treasurer shall, within 60 days of the treasurer's receipt of the contribution, refund the contribution to the

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contributor. 11 C.F.R. § 103.3(b)(3).

Commission regulations provide that any contribution made by more than one person, except for a contribution made by a partnership, shall include the signature of each contributor on the check, money order, or other negotiable instrument or in a separate writing. A contribution made by more than one person that does not indicate the amount to be attributed to each contributor shall be attributed equally to each contributor. If a contribution to a candidate on its face or when aggregated with other contributions from the same contributor exceeds the limitations on contributions, the treasurer may ask the contributor whether the contribution was intended to be a joint contribution by more than one person. A contribution shall be considered to be reattributed to another contributor if the treasurer of the recipient political committees asks the contributor whether the contribution is intended to be a joint contribution by more than one person and informs the contributor that he or she may request the return of the excessive portion of the contribution if it is not intended to be a joint contribution and, within sixty (60) days from the date of the treasurer's receipt of the contribution, the contributors provide the treasurer with a written reattribution of the contribution, which is signed by each contributor and which indicates the amount to be attributed to each contributor if equal attribution is not intended. 11 C.F.R. § 110.1(k).

The examination and audit of the Dole For President Committee revealed that the Respondent had made contributions to the

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Committee that aggregated $2,466 and which were not redesignated to another election, reattributed to a spouse or other person, or refunded within 60 days of their receipt by the Committee. Thus, these contributions exceeded the $1,000 limitation for contributions to candidates for President of the United States.

Therefore, there is reason to believe Floyd M. Ayers has violated 2 U.S.C. § 441a(a)(1)(A).

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FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

November 21, 1991

Matthew N. Clapp, Jr.
720 Olive Way
Seattle, WA 98101

RE: MUR 3309

Dear Mr. Clapp:

On October 29, 1991, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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 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. 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.

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 enclosed a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 219-3690.

Sincerely,

John Warren McGarry
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Matthew N. Clapp, Jr. **MUR:** 3309

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. 2 U.S.C. § 437(a)(2). It is based on the audit of the Dole for President Committee pursuant to 26 U.S.C. § 9038(a).

No person shall make contributions to any candidate with respect to any election for Federal office which, in the aggregate, exceed $1,000.00. 2 U.S.C. § 441a(a)(1)(A). These limitations apply separately to each election, except that all elections held in any calendar year for the office of President of the United States (except a general election for such office) shall be considered to be one election. 2 U.S.C. § 441a(a)(6). No candidate or political committee shall knowingly accept any contributions in violation of these limitations. 2 U.S.C. § 441a(f).

Commission regulations explain that contributions which exceed the contribution limitations may be deposited into a campaign depository. If any such contributions are so deposited, the treasurer may request redesignation or reattribution of the contribution by the contributor in accordance with Commission regulations. If a redesignation or reattribution is not obtained, the treasurer shall, within 60 days of the treasurer's receipt of the contribution, refund the contribution to the

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contributor. 11 C.F.R. § 103.3(b)(3).

Commission regulations provide that any contribution made by more than one person, except for a contribution made by a partnership, shall include the signature of each contributor on the check, money order, or other negotiable instrument or in a separate writing. A contribution made by more than one person that does not indicate the amount to be attributed to each contributor shall be attributed equally to each contributor. If a contribution to a candidate on its face or when aggregated with other contributions from the same contributor exceeds the limitations on contributions, the treasurer may ask the contributor whether the contribution was intended to be a joint contribution by more than one person. A contribution shall be considered to be reattributed to another contributor if the treasurer of the recipient political committees asks the contributor whether the contribution is intended to be a joint contribution by more than one person and informs the contributor that he or she may request the return of the excessive portion of the contribution if it is not intended to be a joint contribution and, within sixty (60) days from the date of the treasurer's receipt of the contribution, the contributors provide the treasurer with a written reattribution of the contribution, which is signed by each contributor and which indicates the amount to be attributed to each contributor if equal attribution is not intended. 11 C.F.R. § 110.1(k).

The examination and audit of the Dole For President Committee revealed that the Respondent had made contributions to the

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Committee that aggregated $4,000 and which were not redesignated to another election, reattributed to a spouse or other person, or refunded within 60 days of their receipt by the Committee. Thus, these contributions exceeded the $1,000 limitation for contributions to candidates for President of the United States.

Therefore, there is reason to believe Matthew N. Clapp, Jr. has violated 2 U.S.C. § 441a(a)(1)(A).

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FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

November 21, 1991

Edna N. Davol
40 Holbrook Avenue
Rumford, RI 02916

RE: MUR 3309

Dear Ms. Davol:

On October 29, 1991, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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 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. 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.

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 enclosed a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 219-3690.

Sincerely,

John Warren McGarry

John Warren McGarry
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Mrs. Edna M. Davol MUR: 3309

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. 2 U.S.C. § 437(a)(2). It is based on the audit of the Dole for President Committee pursuant to 26 U.S.C. § 9038(a).

No person shall make contributions to any candidate with respect to any election for Federal office which, in the aggregate, exceed $1,000.00. 2 U.S.C. § 441a(a)(1)(A). These limitations apply separately to each election, except that all elections held in any calendar year for the office of President of the United States (except a general election for such office) shall be considered to be one election. 2 U.S.C. § 441a(a)(6). No candidate or political committee shall knowingly accept any contributions in violation of these limitations. 2 U.S.C. § 441a(f).

Commission regulations explain that contributions which exceed the contribution limitations may be deposited into a campaign depository. If any such contributions are so deposited, the treasurer may request redesignation or reattribution of the contribution by the contributor in accordance with Commission regulations. If a redesignation or reattribution is not obtained, the treasurer shall, within 60 days of the treasurer's receipt of the contribution, refund the contribution to the

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contributor. 11 C.F.R. § 103.3(b)(3).

Commission regulations provide that any contribution made by more than one person, except for a contribution made by a partnership, shall include the signature of each contributor on the check, money order, or other negotiable instrument or in a separate writing. A contribution made by more than one person that does not indicate the amount to be attributed to each contributor shall be attributed equally to each contributor. If a contribution to a candidate on its face or when aggregated with other contributions from the same contributor exceeds the limitations on contributions, the treasurer may ask the contributor whether the contribution was intended to be a joint contribution by more than one person. A contribution shall be considered to be reattributed to another contributor if the treasurer of the recipient political committees asks the contributor whether the contribution is intended to be a joint contribution by more than one person and informs the contributor that he or she may request the return of the excessive portion of the contribution if it is not intended to be a joint contribution and, within sixty (60) days from the date of the treasurer's receipt of the contribution, the contributors provide the treasurer with a written reattribution of the contribution, which is signed by each contributor and which indicates the amount to be attributed to each contributor if equal attribution is not intended. 11 C.F.R. § 110.1(k).

The examination and audit of the Dole For President Committee revealed that the Respondent had made contributions to the

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Committee that aggregated $3,140 and which were not redesignated to another election, reattributed to a spouse or other person, or refunded within 60 days of their receipt by the Committee. Thus, these contributions exceeded the $1,000 limitation for contributions to candidates for President of the United States.

Therefore, there is reason to believe Mrs. Edna M. Davol has violated 2 U.S.C. § 441a(a)(1)(A).

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 21, 1991

Doris E. Freeman
1103 Edgewater Drive
Orlando, FL 32804

RE: MUR 3309

Dear Ms. Freeman:

On October 29, 1991, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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 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. 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.

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 enclosed a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 219-3690.

Sincerely,

John Warren McGarry

John Warren McGarry
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Doris E. Freeman **MUR:** 3309

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities, 2 U.S.C. § 437(a)(2). It is based on the audit of the Dole for President Committee pursuant to 26 U.S.C. § 9038(a).

No person shall make contributions to any candidate with respect to any election for Federal office which, in the aggregate, exceed $1,000.00. 2 U.S.C. § 441a(a)(1)(A). These limitations apply separately to each election, except that all elections held in any calendar year for the office of President of the United States (except a general election for such office) shall be considered to be one election. 2 U.S.C. § 441a(a)(6). No candidate or political committee shall knowingly accept any contributions in violation of these limitations. 2 U.S.C. § 441a(f).

Commission regulations explain that contributions which exceed the contribution limitations may be deposited into a campaign depository. If any such contributions are so deposited, the treasurer may request redesignation or reattribution of the contribution by the contributor in accordance with Commission regulations. If a redesignation or reattribution is not obtained, the treasurer shall, within 60 days of the treasurer's receipt of the contribution, refund the contribution to the

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contributor. 11 C.F.R. § 103.3(b)(3).

Commission regulations provide that any contribution made by more than one person, except for a contribution made by a partnership, shall include the signature of each contributor on the check, money order, or other negotiable instrument or in a separate writing. A contribution made by more than one person that does not indicate the amount to be attributed to each contributor shall be attributed equally to each contributor. If a contribution to a candidate on its face or when aggregated with other contributions from the same contributor exceeds the limitations on contributions, the treasurer may ask the contributor whether the contribution was intended to be a joint contribution by more than one person. A contribution shall be considered to be reattributed to another contributor if the treasurer of the recipient political committees asks the contributor whether the contribution is intended to be a joint contribution by more than one person and informs the contributor that he or she may request the return of the excessive portion of the contribution if it is not intended to be a joint contribution and, within sixty (60) days from the date of the treasurer's receipt of the contribution, the contributors provide the treasurer with a written reattribution of the contribution, which is signed by each contributor and which indicates the amount to be attributed to each contributor if equal attribution is not intended. 11 C.F.R. § 110.1(k).

The examination and audit of the Dole For President Committee revealed that the Respondent had made contributions to the

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Committee that aggregated $2,295 and which were not redesignated to another election, reattributed to a spouse or other person, or refunded within 60 days of their receipt by the Committee. Thus, these contributions exceeded the $1,000 limitation for contributions to candidates for President of the United States.

Therefore, there is reason to believe Doris E. Freeman has violated 2 U.S.C. § 441a(a)(1)(A).

9304095520068

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 21, 1991

Lydia Fried
6 Vendome Court
Bethesda, MD 20817

RE: MUR 3309

Dear Ms. Fried:

On October 29, 1991, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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 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. 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.

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 enclosed a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 219-3690.

Sincerely,

John Warren McGarry
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Lydia Fried **MUR:** 3309

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. 2 U.S.C. § 437(a)(2). It is based on the audit of the Dole for President Committee pursuant to 26 U.S.C. § 9038(a).

No person shall make contributions to any candidate with respect to any election for Federal office which, in the aggregate, exceed $1,000.00. 2 U.S.C. § 441a(a)(1)(A). These limitations apply separately to each election, except that all elections held in any calendar year for the office of President of the United States (except a general election for such office) shall be considered to be one election. 2 U.S.C. § 441a(a)(6). No candidate or political committee shall knowingly accept any contributions in violation of these limitations. 2 U.S.C. § 441a(f).

Commission regulations explain that contributions which exceed the contribution limitations may be deposited into a campaign depository. If any such contributions are so deposited, the treasurer may request redesignation or reattribution of the contribution by the contributor in accordance with Commission regulations. If a redesignation or reattribution is not obtained, the treasurer shall, within 60 days of the treasurer's receipt of the contribution, refund the contribution to the

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contributor. 11 C.F.R. § 103.3(b)(3).

Commission regulations provide that any contribution made by more than one person, except for a contribution made by a partnership, shall include the signature of each contributor on the check, money order, or other negotiable instrument or in a separate writing. A contribution made by more than one person that does not indicate the amount to be attributed to each contributor shall be attributed equally to each contributor. If a contribution to a candidate on its face or when aggregated with other contributions from the same contributor exceeds the limitations on contributions, the treasurer may ask the contributor whether the contribution was intended to be a joint contribution by more than one person. A contribution shall be considered to be reattributed to another contributor if the treasurer of the recipient political committees asks the contributor whether the contribution is intended to be a joint contribution by more than one person and informs the contributor that he or she may request the return of the excessive portion of the contribution if it is not intended to be a joint contribution and, within sixty (60) days from the date of the treasurer's receipt of the contribution, the contributors provide the treasurer with a written reattribution of the contribution, which is signed by each contributor and which indicates the amount to be attributed to each contributor if equal attribution is not intended. 11 C.F.R. § 110.1(k).

The examination and audit of the Dole For President Committee revealed that the Respondent had made contributions to the

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Committee that aggregated $3,000 and which were not redesignated to another election, reattributed to a spouse or other person, or refunded within 60 days of their receipt by the Committee. Thus, these contributions exceeded the $1,000 limitation for contributions to candidates for President of the United States.

Therefore, there is reason to believe Lydia Fried has violated 2 U.S.C. § 441a(a)(1)(A).

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 21, 1991

John J. Hamilton, III
2929 Campus Drive #450
San Mateo, CA 94403

RE: MUR 3309

Dear Mr. Hamilton:

On October 29, 1991, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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 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. 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.

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 enclosed a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 219-3690.

Sincerely,

John Warren McGarry

John Warren McGarry
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: John J. Hamilton, III **MUR:** 3309

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. 2 U.S.C. § 437(a)(2). It is based on the audit of the Dole for President Committee pursuant to 26 U.S.C. § 9038(a).

No person shall make contributions to any candidate with respect to any election for Federal office which, in the aggregate, exceed $1,000.00. 2 U.S.C. § 441a(a)(1)(A). These limitations apply separately to each election, except that all elections held in any calendar year for the office of President of the United States (except a general election for such office) shall be considered to be one election. 2 U.S.C. § 441a(a)(6). No candidate or political committee shall knowingly accept any contributions in violation of these limitations. 2 U.S.C. § 441a(f).

Commission regulations explain that contributions which exceed the contribution limitations may be deposited into a campaign depository. If any such contributions are so deposited, the treasurer may request redesignation or reattribution of the contribution by the contributor in accordance with Commission regulations. If a redesignation or reattribution is not obtained, the treasurer shall, within 60 days of the treasurer's receipt of the contribution, refund the contribution to the

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contributor. 11 C.F.R. § 103.3(b)(3).

Commission regulations provide that any contribution made by more than one person, except for a contribution made by a partnership, shall include the signature of each contributor on the check, money order, or other negotiable instrument or in a separate writing. A contribution made by more than one person that does not indicate the amount to be attributed to each contributor shall be attributed equally to each contributor. If a contribution to a candidate on its face or when aggregated with other contributions from the same contributor exceeds the limitations on contributions, the treasurer may ask the contributor whether the contribution was intended to be a joint contribution by more than one person. A contribution shall be considered to be reattributed to another contributor if the treasurer of the recipient political committees asks the contributor whether the contribution is intended to be a joint contribution by more than one person and informs the contributor that he or she may request the return of the excessive portion of the contribution if it is not intended to be a joint contribution and, within sixty (60) days from the date of the treasurer's receipt of the contribution, the contributors provide the treasurer with a written reattribution of the contribution, which is signed by each contributor and which indicates the amount to be attributed to each contributor if equal attribution is not intended. 11 C.F.R. § 110.1(k).

The examination and audit of the Dole For President Committee revealed that the Respondent had made contributions to the

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Committee that aggregated $2,025 and which were not redesignated to another election, reattributed to a spouse or other person, or refunded within 60 days of their receipt by the Committee. Thus, these contributions exceeded the $1,000 limitation for contributions to candidates for President of the United States.

Therefore, there is reason to believe John J. Hamilton, III has violated 2 U.S.C. § 441a(a)(1)(A).

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FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

November 21, 1991

Willis A. Hesselroth
1 Gracie Terrace #9-B
New York, NY 10028

RE: MUR 3309

Dear Mr. Hesselroth:

On October 29, 1991, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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 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. 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.

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 enclosed a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 219-3690.

Sincerely,

John Warren McGarry

John Warren McGarry
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Willis S. Hesselroth **MUR:** 3309

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. 2 U.S.C. § 437(a)(2). It is based on the audit of the Dole for President Committee pursuant to 26 U.S.C. § 9038(a).

No person shall make contributions to any candidate with respect to any election for Federal office which, in the aggregate, exceed $1,000.00. 2 U.S.C. § 441a(a)(1)(A). These limitations apply separately to each election, except that all elections held in any calendar year for the office of President of the United States (except a general election for such office) shall be considered to be one election. 2 U.S.C. § 441a(a)(6). No candidate or political committee shall knowingly accept any contributions in violation of these limitations. 2 U.S.C. § 441a(f).

Commission regulations explain that contributions which exceed the contribution limitations may be deposited into a campaign depository. If any such contributions are so deposited, the treasurer may request redesignation or reattribution of the contribution by the contributor in accordance with Commission regulations. If a redesignation or reattribution is not obtained, the treasurer shall, within 60 days of the treasurer's receipt of the contribution, refund the contribution to the

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contributor. 11 C.F.R. § 103.3(b)(3).

Commission regulations provide that any contribution made by more than one person, except for a contribution made by a partnership, shall include the signature of each contributor on the check, money order, or other negotiable instrument or in a separate writing. A contribution made by more than one person that does not indicate the amount to be attributed to each contributor shall be attributed equally to each contributor. If a contribution to a candidate on its face or when aggregated with other contributions from the same contributor exceeds the limitations on contributions, the treasurer may ask the contributor whether the contribution was intended to be a joint contribution by more than one person. A contribution shall be considered to be reattributed to another contributor if the treasurer of the recipient political committees asks the contributor whether the contribution is intended to be a joint contribution by more than one person and informs the contributor that he or she may request the return of the excessive portion of the contribution if it is not intended to be a joint contribution and, within sixty (60) days from the date of the treasurer's receipt of the contribution, the contributors provide the treasurer with a written reattribution of the contribution, which is signed by each contributor and which indicates the amount to be attributed to each contributor if equal attribution is not intended. 11 C.F.R. § 110.1(k).

The examination and audit of the Dole For President Committee revealed that the Respondent had made contributions to the

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Committee that aggregated $3,000 and which were not redesignated to another election, reattributed to a spouse or other person, or refunded within 60 days of their receipt by the Committee. Thus, these contributions exceeded the $1,000 limitation for contributions to candidates for President of the United States.

Therefore, there is reason to believe Willis S. Hesselroth has violated 2 U.S.C. § 441a(a)(1)(A).

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 21, 1991

John W. King
31 Buckingham Road
Norwood, MA 02062

RE: MUR 3309

Dear Mr. King:

On October 29, 1991, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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 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. 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.

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 enclosed a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 219-3690.

Sincerely,

John Warren McGarry

John Warren McGarry
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: John W. King **MUR:** 3309

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. 2 U.S.C. § 437(a)(2). It is based on the audit of the Dole for President Committee pursuant to 26 U.S.C. § 9038(a).

No person shall make contributions to any candidate with respect to any election for Federal office which, in the aggregate, exceed $1,000.00. 2 U.S.C. § 441a(a)(1)(A). These limitations apply separately to each election, except that all elections held in any calendar year for the office of President of the United States (except a general election for such office) shall be considered to be one election. 2 U.S.C. § 441a(a)(6). No candidate or political committee shall knowingly accept any contributions in violation of these limitations. 2 U.S.C. § 441a(f).

Commission regulations explain that contributions which exceed the contribution limitations may be deposited into a campaign depository. If any such contributions are so deposited, the treasurer may request redesignation or reattribution of the contribution by the contributor in accordance with Commission regulations. If a redesignation or reattribution is not obtained, the treasurer shall, within 60 days of the treasurer's receipt of the contribution, refund the contribution to the

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contributor. 11 C.F.R. § 103.3(b)(3).

Commission regulations provide that any contribution made by more than one person, except for a contribution made by a partnership, shall include the signature of each contributor on the check, money order, or other negotiable instrument or in a separate writing. A contribution made by more than one person that does not indicate the amount to be attributed to each contributor shall be attributed equally to each contributor. If a contribution to a candidate on its face or when aggregated with other contributions from the same contributor exceeds the limitations on contributions, the treasurer may ask the contributor whether the contribution was intended to be a joint contribution by more than one person. A contribution shall be considered to be reattributed to another contributor if the treasurer of the recipient political committees asks the contributor whether the contribution is intended to be a joint contribution by more than one person and informs the contributor that he or she may request the return of the excessive portion of the contribution if it is not intended to be a joint contribution and, within sixty (60) days from the date of the treasurer's receipt of the contribution, the contributors provide the treasurer with a written reattribution of the contribution, which is signed by each contributor and which indicates the amount to be attributed to each contributor if equal attribution is not intended. 11 C.F.R. § 110.1(k).

The examination and audit of the Dole For President Committee revealed that the Respondent had made contributions to the

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Committee that aggregated $2,500 and which were not redesignated to another election, reattributed to a spouse or other person, or refunded within 60 days of their receipt by the Committee. Thus, these contributions exceeded the $1,000 limitation for contributions to candidates for President of the United States.

Therefore, there is reason to believe John W. King has violated 2 U.S.C. § 441a(a)(1)(A).

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 21, 1991

Maurice A. Lancaster
12204 Alhambra
Leawood, KS 66209

RE: MUR 3309

Dear Mr. Lancaster:

On October 29, 1991, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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 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. 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.

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 enclosed a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 219-3690.

Sincerely,

John Warren McGarry

John Warren McGarry
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Maurice A. Lancaster **MUR:** 3309

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. 2 U.S.C. § 437(a)(2). It is based on the audit of the Dole for President Committee pursuant to 26 U.S.C. § 9038(a).

No person shall make contributions to any candidate with respect to any election for Federal office which, in the aggregate, exceed $1,000.00. 2 U.S.C. § 441a(a)(1)(A). These limitations apply separately to each election, except that all elections held in any calendar year for the office of President of the United States (except a general election for such office) shall be considered to be one election. 2 U.S.C. § 441a(a)(6). No candidate or political committee shall knowingly accept any contributions in violation of these limitations. 2 U.S.C. § 441a(f).

Commission regulations explain that contributions which exceed the contribution limitations may be deposited into a campaign depository. If any such contributions are so deposited, the treasurer may request redesignation or reattribution of the contribution by the contributor in accordance with Commission regulations. If a redesignation or reattribution is not obtained, the treasurer shall, within 60 days of the treasurer's receipt of the contribution, refund the contribution to the

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contributor. 11 C.F.R. § 103.3(b)(3).

Commission regulations provide that any contribution made by more than one person, except for a contribution made by a partnership, shall include the signature of each contributor on the check, money order, or other negotiable instrument or in a separate writing. A contribution made by more than one person that does not indicate the amount to be attributed to each contributor shall be attributed equally to each contributor. If a contribution to a candidate on its face or when aggregated with other contributions from the same contributor exceeds the limitations on contributions, the treasurer may ask the contributor whether the contribution was intended to be a joint contribution by more than one person. A contribution shall be considered to be reattributed to another contributor if the treasurer of the recipient political committees asks the contributor whether the contribution is intended to be a joint contribution by more than one person and informs the contributor that he or she may request the return of the excessive portion of the contribution if it is not intended to be a joint contribution and, within sixty (60) days from the date of the treasurer's receipt of the contribution, the contributors provide the treasurer with a written reattribution of the contribution, which is signed by each contributor and which indicates the amount to be attributed to each contributor if equal attribution is not intended. 11 C.F.R. § 110.1(k).

The examination and audit of the Dole For President Committee revealed that the Respondent had made contributions to the

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Committee that aggregated $3,000 and which were not redesignated to another election, reattributed to a spouse or other person, or refunded within 60 days of their receipt by the Committee. Thus, these contributions exceeded the $1,000 limitation for contributions to candidates for President of the United States.

Therefore, there is reason to believe Maurice A. Lancaster has violated 2 U.S.C. § 441a(a)(1)(A).

93040952093

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

November 21, 1991

Katherine F. McCoy
P.O. Box 2413
West Palm Beach, FL 33402

RE: MUR 3309

Dear Ms. McCoy:

On October 29, 1991, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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 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. 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.

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 enclosed a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 219-3690.

Sincerely,

John Warren McGarry

John Warren McGarry
Chairman

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2304095295

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Katherine F. McCoy **MUR:** 3309

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. 2 U.S.C. § 437(a)(2). It is based on the audit of the Dole for President Committee pursuant to 26 U.S.C. § 9038(a).

No person shall make contributions to any candidate with respect to any election for Federal office which, in the aggregate, exceed $1,000.00. 2 U.S.C. § 441a(a)(1)(A). These limitations apply separately to each election, except that all elections held in any calendar year for the office of President of the United States (except a general election for such office) shall be considered to be one election. 2 U.S.C. § 441a(a)(6). No candidate or political committee shall knowingly accept any contributions in violation of these limitations. 2 U.S.C. § 441a(f).

Commission regulations explain that contributions which exceed the contribution limitations may be deposited into a campaign depository. If any such contributions are so deposited, the treasurer may request redesignation or reattribution of the contribution by the contributor in accordance with Commission regulations. If a redesignation or reattribution is not obtained, the treasurer shall, within 60 days of the treasurer's receipt of the contribution, refund the contribution to the

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contributor. 11 C.F.R. § 103.3(b)(3).

Commission regulations provide that any contribution made by more than one person, except for a contribution made by a partnership, shall include the signature of each contributor on the check, money order, or other negotiable instrument or in a separate writing. A contribution made by more than one person that does not indicate the amount to be attributed to each contributor shall be attributed equally to each contributor. If a contribution to a candidate on its face or when aggregated with other contributions from the same contributor exceeds the limitations on contributions, the treasurer may ask the contributor whether the contribution was intended to be a joint contribution by more than one person. A contribution shall be considered to be reattributed to another contributor if the treasurer of the recipient political committees asks the contributor whether the contribution is intended to be a joint contribution by more than one person and informs the contributor that he or she may request the return of the excessive portion of the contribution if it is not intended to be a joint contribution and, within sixty (60) days from the date of the treasurer's receipt of the contribution, the contributors provide the treasurer with a written reattribution of the contribution, which is signed by each contributor and which indicates the amount to be attributed to each contributor if equal attribution is not intended. 11 C.F.R. § 110.1(k).

The examination and audit of the Dole For President Committee revealed that the Respondent had made contributions to the

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Committee that aggregated $3,000 and which were not redesignated to another election, reattributed to a spouse or other person, or refunded within 60 days of their receipt by the Committee. Thus, these contributions exceeded the $1,000 limitation for contributions to candidates for President of the United States.

Therefore, there is reason to believe Katherine F. McCoy has violated 2 U.S.C. § 441a(a)(1)(A).

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FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

November 21, 1991

J. F. O'Shaughnessy
301 S. Market
Wichita, KS 67202

RE: MUR 3309

Dear Mr. O'Shaughnessy:

On October 29, 1991, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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 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. 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.

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 enclosed a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 219-3690.

Sincerely,

John Warren McGarry
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: J.F. O'Shaughnessy

MUR: 3309

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. 2 U.S.C. § 437(a)(2). It is based on the audit of the Dole for President Committee pursuant to 26 U.S.C. § 9038(a).

No person shall make contributions to any candidate with respect to any election for Federal office which, in the aggregate, exceed $1,000.00. 2 U.S.C. § 441a(a)(1)(A). These limitations apply separately to each election, except that all elections held in a calendar year for the office of President of the United States (except a general election for such office) shall be considered one election. 2 U.S.C. § 441a(a)(6). No candidate or political committee shall knowingly accept any contributions in violation of these limitations. 2 U.S.C. § 441a(f).

Commission regulations explain that contributions which exceed the contribution limitations may be deposited into a campaign depository. If such contributions are so deposited, the treasurer may request redesignation or reattribution of the contribution by the contributor in accordance with Commission regulations. If a redesignation or reattribution is not obtained, the treasurer within 60 days of the treasurer's receipt of the contribution must refund the contribution to the

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contributor. 11 C.F.R. § 103.3(b)(3).

Commission regulations provide that any contribution made by more than one person, except for a contribution made by a partnership, shall include the signature of each contributor on the check, money order, or other negotiable instrument or in a separate writing. A contribution made by more than one person that does not indicate the amount to be attributed to each contributor shall be attributed equally to each contributor. If a contribution to a candidate on its face or when aggregated with other contributions from the same contributor exceeds the limitations on contributions, the treasurer may ask the contributor whether the contribution was intended to be a joint contribution by more than one person. A contribution shall be considered to be reattributed to another contributor if the treasurer of the recipient political committees asks the contributor whether the contribution is intended to be a joint contribution by more than one person and informs the contributor that he or she may request the return of the excessive portion of the contribution if it is not intended to be a joint contribution and, within sixty (60) days from the date of the treasurer's receipt of the contribution, the contributors provide the treasurer with a written reattribution of the contribution, which is signed by each contributor and which indicates the amount to be attributed to each contributor if equal attribution is not intended. 11 C.F.R. § 110.1(k).

The examination and audit of the Dole For President Committee revealed that the Respondent had made contributions to the

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Committee that aggregated $2,500 and which were not redesignated to another election, reattributed to a spouse or other person, or refunded within 60 days of their receipt by the Committee. Thus, these contributions exceeded the $1,000 limitation for contributions to candidates for President of the United States.

Therefore, there is reason to believe J.F. O'Shaughnessy has violated 2 U.S.C. § 441a(a)(1)(A).

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FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

November 21, 1991

U. E. Patrick
P.O. Box 747
Jackson, MI 49204

RE: MUR 3309

Dear Mr. Patrick:

On October 29, 1991, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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 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. 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.

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 enclosed a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 219-3690.

Sincerely,

John Warren McGarry

John Warren McGarry
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: U.E. Patrick **MUR:** 3309

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. 2 U.S.C. § 437(a)(2). It is based on the audit of the Dole for President Committee pursuant to 26 U.S.C. § 9038(a).

No person shall make contributions to any candidate with respect to any election for Federal office which, in the aggregate, exceed $1,000.00. 2 U.S.C. § 441a(a)(1)(A). These limitations apply separately to each election, except that all elections held in any calendar year for the office of President of the United States (except a general election for such office) shall be considered to be one election. 2 U.S.C. § 441a(a)(6). No candidate or political committee shall knowingly accept any contributions in violation of these limitations. 2 U.S.C. § 441a(f).

Commission regulations explain that contributions which exceed the contribution limitations may be deposited into a campaign depository. If any such contributions are so deposited, the treasurer may request redesignation or reattribution of the contribution by the contributor in accordance with Commission regulations. If a redesignation or reattribution is not obtained, the treasurer shall, within 60 days of the treasurer's receipt of the contribution, refund the contribution to the

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contributor. 11 C.F.R. § 103.3(b)(3).

Commission regulations provide that any contribution made by more than one person, except for a contribution made by a partnership, shall include the signature of each contributor on the check, money order, or other negotiable instrument or in a separate writing. A contribution made by more than one person that does not indicate the amount to be attributed to each contributor shall be attributed equally to each contributor. If a contribution to a candidate on its face or when aggregated with other contributions from the same contributor exceeds the limitations on contributions, the treasurer may ask the contributor whether the contribution was intended to be a joint contribution by more than one person. A contribution shall be considered to be reattributed to another contributor if the treasurer of the recipient political committees asks the contributor whether the contribution is intended to be a joint contribution by more than one person and informs the contributor that he or she may request the return of the excessive portion of the contribution if it is not intended to be a joint contribution and, within sixty (60) days from the date of the treasurer's receipt of the contribution, the contributors provide the treasurer with a written reattribution of the contribution, which is signed by each contributor and which indicates the amount to be attributed to each contributor if equal attribution is not intended. 11 C.F.R. § 110.1(k).

The examination and audit of the Dole For President Committee revealed that the Respondent had made contributions to the

2304095210 7

Committee that aggregated $2,500 and which were not redesignated to another election, reattributed to a spouse or other person, or refunded within 60 days of their receipt by the Committee. Thus, these contributions exceeded the $1,000 limitation for contributions to candidates for President of the United States.

Therefore, there is reason to believe U.E. Patrick has violated 2 U.S.C. § 441a(a)(1)(A).

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 21, 1991

Lonnie Ken Pilgrim
P.O. Box 393
Pittsburgh, TX 75686

RE: MUR 3309

Dear Mr. Pilgrim:

On October 29, 1991, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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 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. 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.

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 enclosed a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 219-3690.

Sincerely,

John Warren McGarry

John Warren McGarry
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Lonnie Ken Pilgrim **MUR:** 3309

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. 2 U.S.C. § 437(a)(2). It is based on the audit of the Dole for President Committee pursuant to 26 U.S.C. § 9038(a).

No person shall make contributions to any candidate with respect to any election for Federal office which, in the aggregate, exceed $1,000.00. 2 U.S.C. § 441a(a)(1)(A). These limitations apply separately to each election, except that all elections held in any calendar year for the office of President of the United States (except a general election for such office) shall be considered to be one election. 2 U.S.C. § 441a(a)(6). No candidate or political committee shall knowingly accept any contributions in violation of these limitations. 2 U.S.C. § 441a(f).

Commission regulations explain that contributions which exceed the contribution limitations may be deposited into a campaign depository. If any such contributions are so deposited, the treasurer may request redesignation or reattribution of the contribution by the contributor in accordance with Commission regulations. If a redesignation or reattribution is not obtained, the treasurer shall, within 60 days of the treasurer's receipt of the contribution, refund the contribution to the

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contributor. 11 C.F.R. § 103.3(b)(3).

Commission regulations provide that any contribution made by more than one person, except for a contribution made by a partnership, shall include the signature of each contributor on the check, money order, or other negotiable instrument or in a separate writing. A contribution made by more than one person that does not indicate the amount to be attributed to each contributor shall be attributed equally to each contributor. If a contribution to a candidate on its face or when aggregated with other contributions from the same contributor exceeds the limitations on contributions, the treasurer may ask the contributor whether the contribution was intended to be a joint contribution by more than one person. A contribution shall be considered to be reattributed to another contributor if the treasurer of the recipient political committees asks the contributor whether the contribution is intended to be a joint contribution by more than one person and informs the contributor that he or she may request the return of the excessive portion of the contribution if it is not intended to be a joint contribution and, within sixty (60) days from the date of the treasurer's receipt of the contribution, the contributors provide the treasurer with a written reattribution of the contribution, which is signed by each contributor and which indicates the amount to be attributed to each contributor if equal attribution is not intended. 11 C.F.R. § 110.1(k).

The examination and audit of the Dole For President Committee revealed that the Respondent had made contributions to the

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Committee that aggregated $3,000 and which were not redesignated to another election, reattributed to a spouse or other person, or refunded within 60 days of their receipt by the Committee. Thus, these contributions exceeded the $1,000 limitation for contributions to candidates for President of the United States.

Therefore, there is reason to believe Lonnie Ken Pilgrim has violated 2 U.S.C. § 441a(a)(1)(A).

2304095211 3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 21, 1991

Donald H. Piser
45 W 60th Street
#32-K
New York, NY 10023

RE: MUR 3309

Dear Mr. Piser:

On October 29, 1991, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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 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. 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.

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 enclosed a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 219-3690.

Sincerely,

John Warren McGarry
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Donald H. Piser **MUR:** 3309

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. 2 U.S.C. § 437(a)(2). It is based on the audit of the Dole for President Committee pursuant to 26 U.S.C. § 9038(a).

No person shall make contributions to any candidate with respect to any election for Federal office which, in the aggregate, exceed $1,000.00. 2 U.S.C. § 441a(a)(1)(A). These limitations apply separately to each election, except that all elections held in any calendar year for the office of President of the United States (except a general election for such office) shall be considered to be one election. 2 U.S.C. § 441a(a)(6). No candidate or political committee shall knowingly accept any contributions in violation of these limitations. 2 U.S.C. § 441a(f).

Commission regulations explain that contributions which exceed the contribution limitations may be deposited into a campaign depository. If any such contributions are so deposited, the treasurer may request redesignation or reattribution of the contribution by the contributor in accordance with Commission regulations. If a redesignation or reattribution is not obtained, the treasurer shall, within 60 days of the treasurer's receipt of the contribution, refund the contribution to the

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contributor. 11 C.F.R. § 103.3(b)(3).

Commission regulations provide that any contribution made by more than one person, except for a contribution made by a partnership, shall include the signature of each contributor on the check, money order, or other negotiable instrument or in a separate writing. A contribution made by more than one person that does not indicate the amount to be attributed to each contributor shall be attributed equally to each contributor. If a contribution to a candidate on its face or when aggregated with other contributions from the same contributor exceeds the limitations on contributions, the treasurer may ask the contributor whether the contribution was intended to be a joint contribution by more than one person. A contribution shall be considered to be reattributed to another contributor if the treasurer of the recipient political committees asks the contributor whether the contribution is intended to be a joint contribution by more than one person and informs the contributor that he or she may request the return of the excessive portion of the contribution if it is not intended to be a joint contribution and, within sixty (60) days from the date of the treasurer's receipt of the contribution, the contributors provide the treasurer with a written reattribution of the contribution, which is signed by each contributor and which indicates the amount to be attributed to each contributor if equal attribution is not intended. 11 C.F.R. § 110.1(k).

The examination and audit of the Dole For President Committee revealed that the Respondent had made contributions to the

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Committee that aggregated $3,000 and which were not redesignated to another election, reattributed to a spouse or other person, or refunded within 60 days of their receipt by the Committee. Thus, these contributions exceeded the $1,000 limitation for contributions to candidates for President of the United States.

Therefore, there is reason to believe Donald H. Piser has violated 2 U.S.C. § 441a(a)(1)(A).

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 21, 1991

Delford M. Smith
3900 North Hembree
McMinnville, OR 97218

RE: MUR 3309

Dear Mr. Smith:

On October 29, 1991, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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 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. 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.

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 enclosed a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 219-3690.

Sincerely,

John Warren McGarry

John Warren McGarry
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Delford M. Smith **MUR:** 3309

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. 2 U.S.C. § 437(a)(2). It is based on the audit of the Dole for President Committee pursuant to 26 U.S.C. § 9038(a).

No person shall make contributions to any candidate with respect to any election for Federal office which, in the aggregate, exceed $1,000.00. 2 U.S.C. § 441a(a)(1)(A). These limitations apply separately to each election, except that all elections held in any calendar year for the office of President of the United States (except a general election for such office) shall be considered to be one election. 2 U.S.C. § 441a(a)(6). No candidate or political committee shall knowingly accept any contributions in violation of these limitations. 2 U.S.C. § 441a(f).

Commission regulations explain that contributions which exceed the contribution limitations may be deposited into a campaign depository. If any such contributions are so deposited, the treasurer may request redesignation or reattribution of the contribution by the contributor in accordance with Commission regulations. If a redesignation or reattribution is not obtained, the treasurer shall, within 60 days of the treasurer's receipt of the contribution, refund the contribution to the

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contributor. 11 C.F.R. § 103.3(b)(3).

Commission regulations provide that any contribution made by more than one person, except for a contribution made by a partnership, shall include the signature of each contributor on the check, money order, or other negotiable instrument or in a separate writing. A contribution made by more than one person that does not indicate the amount to be attributed to each contributor shall be attributed equally to each contributor. If a contribution to a candidate on its face or when aggregated with other contributions from the same contributor exceeds the limitations on contributions, the treasurer may ask the contributor whether the contribution was intended to be a joint contribution by more than one person. A contribution shall be considered to be reattributed to another contributor if the treasurer of the recipient political committees asks the contributor whether the contribution is intended to be a joint contribution by more than one person and informs the contributor that he or she may request the return of the excessive portion of the contribution if it is not intended to be a joint contribution and, within sixty (60) days from the date of the treasurer's receipt of the contribution, the contributors provide the treasurer with a written reattribution of the contribution, which is signed by each contributor and which indicates the amount to be attributed to each contributor if equal attribution is not intended. 11 C.F.R. § 110.1(k).

The examination and audit of the Dole For President Committee revealed that the Respondent had made contributions to the

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Committee that aggregated $2,100 and which were not redesignated to another election, reattributed to a spouse or other person, or refunded within 60 days of their receipt by the Committee. Thus, these contributions exceeded the $1,000 limitation for contributions to candidates for President of the United States.

Therefore, there is reason to believe Delford M. Smith has violated 2 U.S.C. § 441a(a)(1)(A).

93040952123

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

November 21, 1991

Leroy C. Tombs, Jr.
633 S 13th Street
Bonner Springs, KS 66012

RE: MUR 3309

Dear Mr. Tombs:

On October 29, 1991, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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 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. 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.

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 enclosed a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 219-3690.

Sincerely,

John Warren McGarry
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Leroy C. Tombs, Jr. **MUR:** 3309

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. 2 U.S.C. § 437(a)(2). It is based on the audit of the Dole for President Committee pursuant to 26 U.S.C. § 9038(a).

No person shall make contributions to any candidate with respect to any election for Federal office which, in the aggregate, exceed $1,000.00. 2 U.S.C. § 441a(a)(1)(A). These limitations apply separately to each election, except that all elections held in any calendar year for the office of President of the United States (except a general election for such office) shall be considered to be one election. 2 U.S.C. § 441a(a)(6). No candidate or political committee shall knowingly accept any contributions in violation of these limitations. 2 U.S.C. § 441a(f).

Commission regulations explain that contributions which exceed the contribution limitations may be deposited into a campaign depository. If any such contributions are so deposited, the treasurer may request redesignation or reattribution of the contribution by the contributor in accordance with Commission regulations. If a redesignation or reattribution is not obtained, the treasurer shall, within 60 days of the treasurer's receipt of the contribution, refund the contribution to the

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contributor. 11 C.F.R. § 103.3(b)(3).

Commission regulations provide that any contribution made by more than one person, except for a contribution made by a partnership, shall include the signature of each contributor on the check, money order, or other negotiable instrument or in a separate writing. A contribution made by more than one person that does not indicate the amount to be attributed to each contributor shall be attributed equally to each contributor. If a contribution to a candidate on its face or when aggregated with other contributions from the same contributor exceeds the limitations on contributions, the treasurer may ask the contributor whether the contribution was intended to be a joint contribution by more than one person. A contribution shall be considered to be reattributed to another contributor if the treasurer of the recipient political committees asks the contributor whether the contribution is intended to be a joint contribution by more than one person and informs the contributor that he or she may request the return of the excessive portion of the contribution if it is not intended to be a joint contribution and, within sixty (60) days from the date of the treasurer's receipt of the contribution, the contributors provide the treasurer with a written reattribution of the contribution, which is signed by each contributor and which indicates the amount to be attributed to each contributor if equal attribution is not intended. 11 C.F.R. § 110.1(k).

The examination and audit of the Dole For President Committee revealed that the Respondent had made contributions to the

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Committee that aggregated $2,350 and which were not redesignated to another election, reattributed to a spouse or other person, or refunded within 60 days of their receipt by the Committee. Thus, these contributions exceeded the $1,000 limitation for contributions to candidates for President of the United States.

Therefore, there is reason to believe Leroy C. Tombs, Jr. has violated 2 U.S.C. § 441a(a)(1)(A).

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 21, 1991

Edmund S. Wartels
180 Riverside Drive
New York, NY 10024

RE: MUR 3309

Dear Mr. Wartels:

On October 29, 1991, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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 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. 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.

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 enclosed a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 219-3690.

Sincerely,

John Warren McGarry

John Warren McGarry
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Edmund S. Wartels **MUR:** 3309

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. 2 U.S.C. § 437(a)(2). It is based on the audit of the Dole for President Committee pursuant to 26 U.S.C. § 9038(a).

No person shall make contributions to any candidate with respect to any election for Federal office which, in the aggregate, exceed $1,000.00. 2 U.S.C. § 441a(a)(1)(A). These limitations apply separately to each election, except that all elections held in any calendar year for the office of President of the United States (except a general election for such office) shall be considered to be one election. 2 U.S.C. § 441a(a)(6). No candidate or political committee shall knowingly accept any contributions in violation of these limitations. 2 U.S.C. § 441a(f).

Commission regulations explain that contributions which exceed the contribution limitations may be deposited into a campaign depository. If any such contributions are so deposited, the treasurer may request redesignation or reattribution of the contribution by the contributor in accordance with Commission regulations. If a redesignation or reattribution is not obtained, the treasurer shall, within 60 days of the treasurer's receipt of the contribution, refund the contribution to the

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contributor. 11 C.F.R. § 103.3(b)(3).

Commission regulations provide that any contribution made by more than one person, except for a contribution made by a partnership, shall include the signature of each contributor on the check, money order, or other negotiable instrument or in a separate writing. A contribution made by more than one person that does not indicate the amount to be attributed to each contributor shall be attributed equally to each contributor. If a contribution to a candidate on its face or when aggregated with other contributions from the same contributor exceeds the limitations on contributions, the treasurer may ask the contributor whether the contribution was intended to be a joint contribution by more than one person. A contribution shall be considered to be reattributed to another contributor if the treasurer of the recipient political committees asks the contributor whether the contribution is intended to be a joint contribution by more than one person and informs the contributor that he or she may request the return of the excessive portion of the contribution if it is not intended to be a joint contribution and, within sixty (60) days from the date of the treasurer's receipt of the contribution, the contributors provide the treasurer with a written reattribution of the contribution, which is signed by each contributor and which indicates the amount to be attributed to each contributor if equal attribution is not intended. 11 C.F.R. § 110.1(k).

The examination and audit of the Dole For President Committee revealed that the Respondent had made contributions to the

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Committee that aggregated $3,833.33 and which were not redesignated to another election, reattributed to a spouse or other person, or refunded within 60 days of their receipt by the Committee. Thus, these contributions exceeded the $1,000 limitation for contributions to candidates for President of the United States.

Therefore, there is reason to believe Edmund S. Wartels has violated 2 U.S.C. § 441a(a)(1)(A).

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 21, 1991

Dave H. Williams
510 Park Avenue
New York, NY 10022

RE: MUR 3309

Dear Mr. Williams:

On October 29, 1991, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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 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. 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.

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 enclosed a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 219-3690.

Sincerely,

John Warren McGarry

John Warren McGarry
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Dave H. Williams **MUR:** 3309

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. 2 U.S.C. § 437(a)(2). It is based on the audit of the Dole for President Committee pursuant to 26 U.S.C. § 9038(a).

No person shall make contributions to any candidate with respect to any election for Federal office which, in the aggregate, exceed $1,000.00. 2 U.S.C. § 441a(a)(1)(A). These limitations apply separately to each election, except that all elections held in any calendar year for the office of President of the United States (except a general election for such office) shall be considered to be one election. 2 U.S.C. § 441a(a)(6). No candidate or political committee shall knowingly accept any contributions in violation of these limitations. 2 U.S.C. § 441a(f).

Commission regulations explain that contributions which exceed the contribution limitations may be deposited into a campaign depository. If any such contributions are so deposited, the treasurer may request redesignation or reattribution of the contribution by the contributor in accordance with Commission regulations. If a redesignation or reattribution is not obtained, the treasurer shall, within 60 days of the treasurer's receipt of the contribution, refund the contribution to the

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contributor. 11 C.F.R. § 103.3(b)(3).

Commission regulations provide that any contribution made by more than one person, except for a contribution made by a partnership, shall include the signature of each contributor on the check, money order, or other negotiable instrument or in a separate writing. A contribution made by more than one person that does not indicate the amount to be attributed to each contributor shall be attributed equally to each contributor. If a contribution to a candidate on its face or when aggregated with other contributions from the same contributor exceeds the limitations on contributions, the treasurer may ask the contributor whether the contribution was intended to be a joint contribution by more than one person. A contribution shall be considered to be reattributed to another contributor if the treasurer of the recipient political committees asks the contributor whether the contribution is intended to be a joint contribution by more than one person and informs the contributor that he or she may request the return of the excessive portion of the contribution if it is not intended to be a joint contribution and, within sixty (60) days from the date of the treasurer's receipt of the contribution, the contributors provide the treasurer with a written reattribution of the contribution, which is signed by each contributor and which indicates the amount to be attributed to each contributor if equal attribution is not intended. 11 C.F.R. § 110.1(k).

The examination and audit of the Dole For President Committee revealed that the Respondent had made contributions to the

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Committee that aggregated $3,000 and which were not redesignated to another election, reattributed to a spouse or other person, or refunded within 60 days of their receipt by the Committee. Thus, these contributions exceeded the $1,000 limitation for contributions to candidates for President of the United States.

Therefore, there is reason to believe Dave H. Williams has violated 2 U.S.C. § 441a(a)(1)(A).

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 21, 1991

Carla L. Saunders, Treasurer
U.S. Federation of Small Businesses
PAC
208 G Street, N.E., 2nd Floor
Wshington, D.C. 20002

RE: MUR 3309
U.S. Federation of Small Businesses
PAC and
Carla L. Saunders, Treasurer

Dear Ms. Saunders:

On October 29, 1991, the Federal Election Commission found that there is reason to believe the U.S. Federation of Small Businesses, PAC ("Committee") and you, as treasurer, violated 2 U.S.C. § 441a(a)(1)(A), 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 the Committee and you, as treasurer. 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 the Committee and you, as treasurer, 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

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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.

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 enclosed a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 219-3690.

Sincerely,

John Warren McGarry
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENTS: U.S. Federation of Small Businesses PAC and Carla L. Saunders, as treasurer MUR: 3309

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. 2 U.S.C. § 437(a)(2). It is based on the audit of the Dole for President Committee pursuant to 26 U.S.C. § 9038(a).

No person shall make contributions to any candidate with respect to any election for Federal office which, in the aggregate, exceed $1,000.00. 2 U.S.C. § 441a(a)(1)(A). No multicandidate political committee shall make contributions to any candidate and his authorized political committees with respect to any election for Federal office which, in the aggregate, exceed $5,000.00.[1] These limitations apply separately to each election, except that all elections held in any calendar year for the office of President of the United States (except a general election for such office) shall be considered to be one election. 2 U.S.C. § 441a(a)(6).

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1. A multicandidate political committee means any committee that has been registered with the Commission for at least six months and has received contributions from more than 50 persons and, except for a state political party organization, has made contributions to five or more candidates. 2 U.S.C. § 441a(a)(4). A committee that has not met these requirements is subject to the $1,000 per election limit. Furthermore, an authorized political committee of a candidate may not contribute more than $1,000 to any other candidate for federal office regardless of whether it would otherwise meet the requirements of Section 441a(a)(4). 2 U.S.C. § 432(e)(3).

Commission regulations explain that contributions which exceed the contribution limitations may be deposited into a campaign depository. If any such contributions are so deposited, the treasurer may request redesignation or reattribution of the contribution by the contributor in accordance with Commission regulations. If a redesignation or reattribution is not obtained, the treasurer shall, within 60 days of the treasurer's receipt of the contribution, refund the contribution to the contributor. 11 C.F.R. § 103.3(b)(3).

The examination and audit of the Dole For President Committee revealed that the Respondents made the following contributions to the Committee:

Date	Amount
12/23/87	$1,000
3/11/88	$4,000

The respondents had not qualified as a multicandidate political committee at the time it made its contributions to the Committee. Moreover, these contributions exceed the $1,000 limitation on contributions to candidates for President of the United States.

Therefore, there is reason to believe U.S. Federation of Small Businesses PAC and Carla L. Saunders, as treasurer, violated 2 U.S.C. § 441a(a)(1)(A).

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 21, 1991

Gary K. Bracken, Treasurer
Tele-Communications, Inc., PAC
4643 S. Ulster Street, Suite 600
Denver, CO 80237

RE: MUR 3309
Tele-Communications, Inc., PAC
and Gary K. Bracken, as treasurer

Dear Mr. Bracken:

On Ocotber 29, 1991, the Federal Election Commission found that there is reason to believe Tele-Communications, Inc., PAC ("Committee") and you, as treasurer, violated 2 U.S.C. § 441a(a)(1)(A), 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 the Committee and you, as treasurer. 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 the Committee and you, as treasurer, 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

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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.

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 enclosed a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 219-3690.

Sincerely,

John Warren McGarry

John Warren McGarry
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENTS: Tele-Communications, Inc. PAC
and Gary K. Bracken, as treasurer

MUR: 3309

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. 2 U.S.C. § 437(a)(2). It is based on the audit of the Dole for President Committee pursuant to 26 U.S.C. § 9038(a).

No person shall make contributions to any candidate with respect to any election for Federal office which, in the aggregate, exceed $1,000.00. 2 U.S.C. § 441a(a)(1)(A). No multicandidate political committee shall make contributions to any candidate and his authorized political committees with respect to any election for Federal office which, in the aggregate, exceed $5,000.00.[1] These limitations apply separately to each election, except that all elections held in any calendar year for the office of President of the United States (except a general election for such office) shall be considered to be one election. 2 U.S.C. § 441a(a)(6).

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1. A multicandidate political committee means any committee that has been registered with the Commission for at least six months and has received contributions from more than 50 persons and, except for a state political party organization, has made contributions to five or more candidates. 2 U.S.C. § 441a(a)(4). A committee that has not met these requirements is subject to the $1,000 per election limit. Furthermore, an authorized political committee of a candidate may not contribute more than $1,000 to any other candidate for federal office regardless of whether it would otherwise meet the requirements of Section 441a(a)(4). 2 U.S.C. § 432(e)(3).

Commission regulations explain that contributions which exceed the contribution limitations may be deposited into a campaign depository. If any such contributions are so deposited, the treasurer may request redesignation or reattribution of the contribution by the contributor in accordance with Commission regulations. If a redesignation or reattribution is not obtained, the treasurer shall, within 60 days of the treasurer's receipt of the contribution, refund the contribution to the contributor. 11 C.F.R. § 103.3(b)(3).

The examination and audit of the Dole For President Committee revealed that the Respondents made the following contributions to the Committee:

Date	Amount
11/24/87	$2,000
3/29/88	$1,000

The respondents had not qualified as a multicandidate political committee at the time it made its contributions to the Committee. Moreover, these contributions exceed the $1,000 limitation on contributions to candidates for President of the United States.

Therefore, there is reason to believe Tele-Communications, Inc. PAC and Gary K. Bracken, as treasurer, violated 2 U.S.C. § 441a(a)(1)(A).

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 21, 1991

Harry D. Slaughter, Treasurer
Ernst & Young Los Angeles
Political Action Committee
(EYLA-PAC)
515 South Flower Street
Los Angeles, CA 90071

RE: MUR 3309
Ernst & Young Los Angeles
Political Action Committee
(EYLA-PAC) and
Harry D. Slaughter, as treasurer

Dear Mr. Slaughter:

On October 29, 1991, the Federal Election Commission found that there is reason to believe the Ernst & Young Los Angeles Political Action Committee (EYLA-PAC) ("Committee") and you, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A), 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 the Committee and you, as treasurer. 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 the Committee and you, as treasurer, 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

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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.

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 enclosed a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 219-3690.

Sincerely,

John Warren McGarry

John Warren McGarry
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENTS: Ernst & Young Los Angeles Political Action Committee and Harry D. Slaughter, as treasurer

MUR: 3309

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. 2 U.S.C. § 437(a)(2). It is based on the audit of the Dole for President Committee pursuant to 26 U.S.C. § 9038(a).

No multicandidate political committee shall make contributions to any candidate and his authorized political committees with respect to any election for Federal office which, in the aggregate, exceed $5,000.00.[1] 2 U.S.C. § 441a(a)(2)(A). These limitations apply separately to each election, except that all elections held in any calendar year for the office of President of the United States (except a general election for such office) shall be considered to be one election. 2 U.S.C. § 441a(a)(6).

Commission regulations explain that contributions which exceed the contribution limitations may be deposited into a campaign depository. If any such contributions are so deposited, the treasurer may request redesignation or reattribution of the contribution by the contributor in accordance with Commission

1. A multicandidate political committee means any committee that has been registered with the Commission for at least six months and has received contributions from more than 50 persons and, except for a state political party organization, has made contributions to five or more candidates. 2 U.S.C. § 441a(a)(4).

2304095219

regulations. If a redesignation or reattribution is not obtained, the treasurer shall, within 60 days of the treasurer's receipt of the contribution, refund the contribution to the contributor. 11 C.F.R. § 103.3(b)(3).

The examination and audit of the Dole for President Committee revealed that the Respondents made the following contributions to the Committee:

Date	Amount
6/03/87	$1,000
8/07/87	$1,000
12/23/87	$1,000
12/23/87	$4,000
12/31/87	$ 500

These contributions exceed the $5,000 limitation for contributions to candidates for President of the United States.

Therefore, there is reason to believe Ernst & Young Los Angeles Political Action Committee and Harry D. Slaughter, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A).

2304095215O

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 21, 1991

George S. Hessler, Treasurer
Flour Corporation Public Affairs Committee
(Flour PAC)
3333 Michelson Drive
Irvine, CA 92730

RE: MUR 3309
Flour Corporation Public Affairs
Committee (Flour PAC) and
George S. Hessler, as treasurer

Dear Mr. Hessler

On October 29, 1991, the Federal Election Commission found that there is reason to believe the Flour Corporation Public Affairs Committee (Flour PAC) ("Committee") and you, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A), 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 the Committee and you, as treasurer. 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 the Committee and you, as treasurer, 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

2304095211

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.

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 enclosed a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 219-3690.

Sincerely,

John Warren McGarry

John Warren McGarry
Chairman

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Designation of Counsel Form

9304095215 2

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENTS: Fluor Corporation Public Affairs Committee and George H. Hessler, as treasurer MUR: 3309

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. 2 U.S.C. § 437(a)(2). It is based on the audit of the Dole for President Committee pursuant to 26 U.S.C. § 9038(a).

No multicandidate political committee shall make contributions to any candidate and his authorized political committees with respect to any election for Federal office which, in the aggregate, exceed $5,000.00.[1] 2 U.S.C. § 441a(a)(2)(A). These limitations apply separately to each election, except that all elections held in any calendar year for the office of President of the United States (except a general election for such office) shall be considered to be one election. 2 U.S.C. § 441a(a)(6).

Commission regulations explain that contributions which exceed the contribution limitations may be deposited into a campaign depository. If any such contributions are so deposited, the treasurer may request redesignation or reattribution of the contribution by the contributor in accordance with Commission

1. A multicandidate political committee means any committee that has been registered with the Commission for at least six months and has received contributions from more than 50 persons and, except for a state political party organization, has made contributions to five or more candidates. 2 U.S.C. § 441a(a)(4).

9304095215 3

regulations. If a redesignation or reattribution is not obtained, the treasurer shall, within 60 days of the treasurer's receipt of the contribution, refund the contribution to the contributor. 11 C.F.R. § 103.3(b)(3).

The examination and audit of the Dole for President Committee revealed that the Respondents made the following contributions to the Committee:

Date	Amount
6/30/87	$5,000
11/04/87	$2,000

These contributions exceed the $5,000 limitation for contributions to candidates for President of the United States.

Therefore, there is reason to believe Fluor Corporation Public Affairs Committee and George H. Hessler, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A).

2304095215 4

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 21, 1991

Robert J. Mageau, Treasurer
Hartford Insurance Group
Political Action Committee
Controller Operations
Hartford Plaza
Hartford, CT 06115

RE: MUR 3309
Hartford Insurance Group
Political Action Committee and
Robert J. Mageau, as treasurer

Dear Mr. Mageau:

On October 29, 1991, the Federal Election Commission found that there is reason to believe the Hartford Insurance Group Political Action Committee ("Committee") and you, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A), 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 the Committee and you, as treasurer. 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 the Committee and you, as treasurer, 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

9304095215 5

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.

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 enclosed a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 219-3690.

Sincerely,

John Warren McGarry
Chairman

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9304095215 6

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENTS: Hartford Insurance Group PAC and
Robert J. Mageau, as treasurer

MUR: 3309

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. 2 U.S.C. § 437(a)(2). It is based on the audit of the Dole for President Committee pursuant to 26 U.S.C. § 9038(a).

No multicandidate political committee shall make contributions to any candidate and his authorized political committees with respect to any election for Federal office which, in the aggregate, exceed $5,000.00.[1] 2 U.S.C. § 441a(a)(2)(A). These limitations apply separately to each election, except that all elections held in any calendar year for the office of President of the United States (except a general election for such office) shall be considered to be one election. 2 U.S.C. § 441a(a)(6).

Commission regulations explain that contributions which exceed the contribution limitations may be deposited into a campaign depository. If any such contributions are so deposited, the treasurer may request redesignation or reattribution of the contribution by the contributor in accordance with Commission

1. A multicandidate political committee means any committee that has been registered with the Commission for at least six months and has received contributions from more than 50 persons and, except for a state political party organization, has made contributions to five or more candidates. 2 U.S.C. § 441a(a)(4).

2304095215 7

regulations. If a redesignation or reattribution is not obtained, the treasurer shall, within 60 days of the treasurer's receipt of the contribution, refund the contribution to the contributor. 11 C.F.R. § 103.3(b)(3).

The examination and audit of the Dole for President Committee revealed that the Respondents made the following contributions to the Committee:

Date	Amount
9/21/87	$2,000
3/17/88	$5,000

These contributions exceed the $5,000 limitation for contributions to candidates for President of the United States.

Therefore, there is reason to believe Hartford Insurance Group PAC and Robert J. Mageau, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A).

2304095215 8

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 21, 1991

Robert W. Nelson, Treasurer
General Electric Company PAC
3135 Easton Turnpike
Fairfield, CT 06431

RE: MUR 3309
General Electric Company PAC and
Robert W. Nelson, as treasurer

Dear Mr. Nelson:

On October 29, 1991, the Federal Election Commission found that there is reason to believe the General Electric Company, PAC ("Committee") and you, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A), 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 the Committee and you, as treasurer. 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 the Committee and you, as treasurer, 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

2340952159

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.

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 enclosed a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 219-3690.

Sincerely,

John Warren McGarry

John Warren McGarry
Chairman

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2304095216O

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENTS: General Electric Company Political Action Committee and Richard W. Nelson, as treasurer MUR: 3309

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. 2 U.S.C. § 437(a)(2). It is based on the audit of the Dole for President Committee pursuant to 26 U.S.C. § 9038(a).

No multicandidate political committee shall make contributions to any candidate and his authorized political committees with respect to any election for Federal office which, in the aggregate, exceed $5,000.00.[1] 2 U.S.C. § 441a(a)(2)(A). These limitations apply separately to each election, except that all elections held in any calendar year for the office of President of the United States (except a general election for such office) shall be considered to be one election. 2 U.S.C. § 441a(a)(6).

Commission regulations explain that contributions which exceed the contribution limitations may be deposited into a campaign depository. If any such contributions are so deposited, the treasurer may request redesignation or reattribution of the contribution by the contributor in accordance with Commission regulations. If a redesignation or reattribution is not

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1. A multicandidate political committee means any committee that has been registered with the Commission for at least six months and has received contributions from more than 50 persons and, except for a state political party organization, has made contributions to five or more candidates. 2 U.S.C. § 441a(a)(4).

2304095216 1

obtained, the treasurer shall, within 60 days of the treasurer's receipt of the contribution, refund the contribution to the contributor. 11 C.F.R. § 103.3(b)(3).

The examination and audit of the Dole for President Committee revealed that the Respondents made the following contributions to the Committee:

Date	Amount
11/23/87	$5,000
12/24/87	$1,000
2/12/88	$1,000

These contributions exceed the $5,000 limitation for contributions to candidates for President of the United States.

Therefore, there is reason to believe the General Electric Company Political Action Committee and Richard W. Nelson, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A).

9304095216 2

OGC 3582

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

91 DEC -2 PM 12:11

Donald H. Piser
45 West 60th Street, 32K
New York, NY 10023

November 26, 1991

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

91 DEC -2 PM 3:40

Mr. Jeffrey Long
Staff Member
Federal Election Commission
General Counsel's Office
Washington, DC 20463

Reference: MUR 3309

Dear Mr. Long:

With respect to John Warren McGarry's letter of November 21, 1991 concerning the belief that there was a political contribution made in excess of $1,000 to Senator Dole's campaign in 1987, I submit to you the following material which I have fortunately found in my files, and believe would resolve the matter entirely.

Enclosed please find copies of several documents which first verify that my initial check was written in the amount of $2,000. Unfortunately, the Bank of New York made an error and charged my account for $3,000. This was subsequently corrected as you will see in the correspondence. Furthermore, there is correspondence from Senator Dole's Committee requesting that the $2,000 contribution be split into two different funds, to which I agreed to. As you can also see from the enclosed check stub dated December 7, 1987, the $1,000 was actually refunded to me. The amount, therefore, contributed to the Dole for President Committee was $1,000, which I believe is not a cause for any alleged violation of the Federal Election Campaign Act.

I trust this information is sufficient to withdraw your letter; please correct your records accordingly.

Very truly,

Donald H. Piser

DHP:ml
Enclosures

2304095216 3

Sent 9/15/88

** PLEASE SIGN &
RETURN TODAY

August 22, 1988

Mr. Donald H. Piser
45 W. 60th Street, #32-K
New York, NY 10023

Dear Mr. Piser:

You may recall that earlier in the campaign you contributed, either directly or through reattribution, to Senator Dole's general election "Legal and Accounting Compliance Fund". This money was to be used to help Senator Dole meet the requirements of various federal statutes and regulations.

Now that Senator Dole is no longer in the race for the Republican nomination for president, it is necessary that his committee either refund your contribution from this account or seek your reattribution to Senator Dole's "Post-primary Obligation Fund". DFP is establishing this fund to pay any fines or penalties the Federal Election Commission might levy against Senator Dole and Dole for President after the completion of the FEC's current audit.

This fund is permitted under 11 CFR 9034.4(b)(4) of the Federal Election Commisssion regulations. Of course, if you would prefer, DFP will promptly refund your contribution. Which ever you decide, will you please take a few moments right now to check the appropriate box below and return it in the enclosed postage-paid envelope?

As always, thank you so much for your continued support. I am sorry that this is somewhat confusing but such is the nature of complying with the regulations of the Federal Election Commission.

Sincerely,

Scott

Scott E. Morgan
Chief Counsel

_____ YES, I want to attribute my previous contribution to the Dole for President "Legal and Accounting Compliance Fund" to the Dole for President "Post-primary Obligation Fund". My signature below indicates my agreement with this reattribution.

_____
(please sign here for reattribution)

_____ NO, I prefer to have my contribution refunded directly to me at the above address.

93040952164

Morse Diesel

Construction Company

1515 Broadway
New York, NY 10036
212 730-4000

Donald H. Piser
Director - Corporate Finance

1/22-23-24 DHP, RESOLVED!

December 10, 1987

Mr. Anthony Doherty
Account Administrator
Customer Service, Lower Level
The Bank of New York
530 Fifth Avenue
New York, NY 10036

REFERENCE:
Donald H. Piser

Dear Mr. Doherty:

For record purposes, I would like to document the following complaint regarding my referenced account.

On September 14, 1987, I wrote check No. 262 "Pay to the Order of - Dole for President Committee", a copy of which is enclosed for your review, in the amount of $2,000.00 (two thousand dollars). Upon reviewing my statement for the period of 09/25/87 through 10/23/87, it immediately became apparent that the amount of $3,000.00 was being held against my account. In trying to resolve this difference of $1,000, I discovered that The Bank of New York had, in fact, "VERIFIED" this amount of $3,000 as correct.

In trying to resolve this $1,000 discrepancy, it has become an embarrassing situation for myself as this was intended to be a contribution. As you can see from the copy of check No. 262, the amount of $2,000 (two thousand dollars) was very clearly written and this incident should not have occurred. In the event I did not have substantial funds to cover this amount, I would have been penalized by The Bank of New York.

Please advise me immediately what actions will be taken in this regard.

Sincerely,

DHP:ml

cc: Liam Ward - Account Executive
The Bank of New York

9304095216S5

YOUR ACCOUNT NO.

THE BANK OF NEW YORK

PAGE 1

SOCIAL SECURITY NO./TAX ID. NO.

H

IF BLANK SEE REVERSE SIDE

DONALD H PISER
45 WEST 60TH STREET
APT 32K
NEW YORK NY 10023

H ----

930409552166

DONALD H. PISER
45 WEST 60TH ST., APT. 32K
NEW YORK, NY. 10023

12 VERIFIED PJ

262

CH 10-01-87 021000247 19 2033405833 9/14 1987

1-1/210 53

PAY TO THE ORDER OF Dole For President Committee $2,000.00

Two Thousand and No/100 DOLLARS

THE BANK OF NEW YORK
530 FIFTH AVENUE, NEW YORK, N.Y. 10036

MEMO 01-JSNY

01

NEW YORK STATE BANK FOUNDED 1784

DONALD H. PISER
1515 BROADWAY, SUITE 4100
NEW YORK, NEW YORK 10036

December 7, 1987

Mr. Ross Kauffman
Accounting/Receipts Department
Dole for President
1828 L Street, N.W., Suite 805
Washington, DC 20036

Dear Mr. Kauffman:

Referencing your conversation today with my secretary, I am returning herewith a completed contribution form.

For your record purpose, please note that I am contributing $1,000 to the Dole for President Committee plus $1,000 for the "Legal and Accounting Compliance Fund". Therefore, a refund in the amount of $1,000 should be sent to my attention.

Thank you.

Sincerely,

DHP:ml
Enclosure

Home address:
45 West 60th Street
Apartment 32K
New York, NY 10023

93040952167

DOLE
PRESIDENT

1828 L Street, N.W. • Suite 805
Washington, D.C. 20036
(202) 223-9400
(TDD) (202) 223-9400

November 30, 1987

Mr. Donald H. Piser
45 W. 60th Street #32-K
New York, NY 10023

Dear Mr. Piser:

Thank you very much for your most recent contribution to Senator Dole's presidential effort. Unfortunately, you have contributed in excess of the $1,000.00 limit established by the Federal Election Commission. We are required to refund the excessive portion unless the contribution was intended to be a joint contribution. Accordingly, if anyone else has equitable ownership in the account used to make the contribution, then please have them fill out and sign "#1" on the attached form. If this is done, the campaign can attribute the excessive portion to that person and put it to work getting Senator Dole elected.

In addition, I would ask that you sign "#2." By doing this, the campaign can put the excessive portion toward a "Legal and Accounting Compliance Fund" to be used in helping Senator Dole in the general election.

Of course, if you would prefer a refund simply sign "#3" and the campaign will see to it that you receive a prompt refund.

Whatever you choose, I urge you to fill out the attached form and mail it back to the campaign immediately. We are under a severe time limit set by the Federal Election Commission.

Again, thank you for your support. I apologize for the paperwork, but I assure you that it is very important.

Sincerely,

Scott E. Morgan
Campaign Counsel

Enclosure

Paid for by Dole for President Committee

93040952168

New York Salute to Senator Robert Dole
Grand Hyatt Hotel, New York
September 16, 1987

Name DONALD H PISER

Address 45 WEST 60TH ST. APT 32F

City State [illegible] Zip [illegible]

Occupation [illegible]

Name of Business [illegible]

Spouse's Name [illegible]

Telephone [illegible] 247 [illegible]

☐ 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

930409521169

DONALD H. PISER
45 WEST 60TH ST., APT. 32K
NEW YORK, NY 10023

262

9/11 1987

PAY TO THE ORDER OF Dole For President Committee $ 2,000.00

Two Thousand and 00/100 DOLLARS

THE BANK OF NEW YORK
530 FIFTH AVENUE, NEW YORK, N.Y. 10036

MEMO

⑆ 1

OBC 3591

Owen & Associates, Inc.

David C. Owen, President

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

91 DEC -2 AM 11:50

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

91 DEC -2 PM 3:40

November 27, 1991

Mr. Lawrence D. Parrish
FEDERAL ELECTION COMMISSION
999 E Street, NW
Washington, D.C. 20463

Dear Mr. Parrish:

Pursuant to the letter I received dated November 21, 1991, from John Warren McGarry, I hereby request pre-probable cause conciliation in reference to MUR 3309.

I was unaware that the use of my company's (Owen & Associates, Inc.) plane in traveling on behalf of the Dole for President Committee violated any laws. However, upon being told that such use might be considered some sort of corporate contribution, I immediately informed the Dole for President Committee of my usage and documented the hours. It was my impression that the payment I received from the Committee for more than $9,000.00 was sufficient to clear up any unintended violations.

Please notify me at your earliest convenience of the next step I should take in this situation. More than three years after the fact, I am more than just a little interested in getting this matter resolved.

Sincerely,

David C. Owen

DCO/sw

9304095217O

11827 W. 112th Street, Suite 102 • Overland Park, Kansas 66210 • (913) 469-5614

OGC 3593

WILLIAM WOLSON & ASSOCIATES

November 26, 1991

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
91 DEC -2 PM 3:41

Mr. Jeffrey Long
FEDERAL ELECTION COMMISSION
Washington, D.C. 20463

Re: MUR3309

Dear Mr. Long:

After receiving John McGarry's letter of November 21, 1991, and in your absence, I spoke with George Rishell about the possible violation noted in the letter. I told George that I had taken a friend to a $1,000 a head fund raiser for Senator Dole not realizing that by writing a check for $2,000 to the committee that I was technically violating the Federal Election Campaign Act of 1971.

Several months subsequent to the dinner, the Dole For President Committee sent me a $1,000 check as a refund with a note stating that no individual could make a contribution of greater than $1,000. I trust the Commission's audit of the Dole For President Committee's books would reveal the issuance of this check.

Please let me know if you require any other information from me.

Sincerely,

John Hamilton
Senior Vice President

JH:vs

23040952171

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM
91 DEC -2 AM 11:45

2929 Campus Drive
Suite 450
San Mateo CA 94403
Telephone (415) 341-5300
Facsimile (415) 345-7619

06C 3579

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

Lydia F. Fried
6 Vendome Court
Bethesda, Maryland 20817

91 DEC -2 PM 12:15

November 26, 1991

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
91 DEC -2 PM 3:40

Mr. Jeffrey Long
Federal Election Commission
Washington, D.C. 20463

Re: Lydia Fried MUR 3309

Dear Mr. Long:

I have reviewed your letter of November 21, 1991, and the Federal Election Commission Factual and Legal Analysis enclosed along with said letter.

In order for me to make an informed decision as to which steps to take to resolve this matter, I need more factual information as to the alleged violation. Therefore, I request you provide me with photostatic copies of the checks that are attributed to me in this matter (as such information was not included in the Federal Election Commission Factual and Legal Analysis). If this is not possible, please provide me with any information in your possession concerning the amounts attributed to me, i.e., the dates, amounts, check numbers, etc.

In light of my need for additional information, I also request the Office of the General Counsel grant an extension of time until January 6, 1992, to respond to this matter.

Your attention to this matter is appreciated. If you have any questions or comments, please contact me from 10:00 a.m. to 3:00 p.m. at my office at (301)977-8887.

Very truly yours,

Lydia Fried

Lydia Fried

LF:kc
cc:files
MF:JLongLFF.MF

2304095217 2

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 12, 1991

Lydia Fried
6 Vendome Court
Bethesda, Maryland 20817

RE: MUR 3309
Lydia Fried

Dear Ms. Fried:

This is in response to your letter dated November 26, 1991, which we received December 2, requesting an extension to respond to the reason to believe finding in the above-referenced matter. 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 January 6, 1992.

The checks in question have been sent to Archives and copies are not available. We have enclosed the dates and amounts of the contributions as you have requested.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Jeffrey D. Long
Paralegal

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SCHEDULE B-P ITEMIZED DISBURSEMENTS Line Number 21B

NAME OF COMMITTEE
[illegible] Incumbent Committee, Inc.

[illegible] information copied from such Reports and 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.

NAME, ADDRESS, CITY, STATE, ZIP	PURPOSE OF DISBURSEMENT	DATE (MONTH, DAY, YEAR)	AMOUNT OF EACH DISBURSEMENT THIS PERIOD
D. L. Adams 603 Holliday Street Osage City KS 66523	Contribtuion Refund DISBURSEMENT FOR: PRIMARY	12/04/87	$50.00
S. Truman Cline, Jr. [illegible] Washington Street Hartford CT 06101	Contribution Refund DISBURSEMENT FOR: PRIMARY	12/21/87	[illegible]
Myrtle Housel [illegible] Harrison [illegible] SC [illegible]	Contribution Refund DISBURSEMENT FOR: PRIMARY	12/31/87	$100.00
[illegible] Fried [illegible] Broome St. [illegible] [illegible]	Contribution Refund DISBURSEMENT FOR: PRIMARY	12/04/87	$3000.00
Muriel S. Raymond [illegible] East Scenic Road Bloomfield PA 19054	Contribution Refund DISBURSEMENT FOR: PRIMARY	12/21/87	$130.50
Ruth C. W. Fried [illegible] Sunset Cay Ocean Road Key Largo FL 33037	Contribution Refund DISBURSEMENT FOR: PRIMARY	12/21/87	$25.00
Stephen Ebbing [illegible] Hosmer Street Greenwich CT 06831	Contribution Refund DISBURSEMENT FOR: PRIMARY	12/21/87	$500.00
SUBTOTAL OF DISBURSEMENTS THIS PAGE (optional)			$3,691.50
TOTAL THIS PERIOD (last page this line number only)			

SCHEDULE A-P ITEMIZED RECEIPTS PAGE 198 OF 653
NAME OF COMMITTEE - DOLE EXPLORATORY COMM LINE NUMBER 17A
PERIOD RUN 07/01/87 THRU 09/30/87

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.

NAME, ADDRESS, CITY, STATE, ZIP	EMPLOYER AND OCCUPATION	RECEIPT DATE	RECEIPT AMOUNT
FRIED, MRS. CAROLYN G. 292 HARBOR DRIVE LIDO BEACH NY 11561 (X)PRI ( )GEN ( )OTHER:	INFORMATION REQUESTED AGGREGATE YTD 500.00	08/19/87	500.00
FRIED, MRS LYDIA 6 VENDOME CT BETHESDA MD 20817 (X)PRI ( )GEN ( )OTHER:	SELF EMPLOYED BUILDER AGGREGATE YTD 3,000.00*	07/27/87 09/22/87	1,000.00 2,000.00
FRIED, MR MICHAEL S 6 VENDOME COURT BETHESDA MD 20817 (X)PRI ( )GEN ( )OTHER:	INFORMATION REQUESTED AGGREGATE YTD 2,000.00*	09/22/87	2,000.00
FRIED, MR MIKE 6 PETER COOPER RD NEW YORK CITY NY 10010 (X)PRI ( )GEN ( )OTHER:	THE RELATED COMPANIES EXECUTIVE AGGREGATE YTD 1,000.00	09/25/87	1,000.00
FRIED, MR STANLEY L 292 HARBOR DRIVE LIDO BEACH NY 11561 (X)PRI ( )GEN ( )OTHER:	INFORMATION REQUESTED AGGREGATE YTD 500.00	08/19/87	500.00
FRIEDBERG, MR M PAUL 116 WEST 88TH STREET NEW YORK NY 10024 (X)PRI ( )GEN ( )OTHER:	INFORMATION REQUESTED AGGREGATE YTD 1,000.00	09/25/87	1,000.00
FRIEDLANDER, MRS AUGUSTA R INFORMATION REQUESTED (X)PRI ( )GEN ( )OTHER:	INFORMATION REQUESTED AGGREGATE YTD 1,000.00	09/18/87	1,000.00
SUBTOTAL OF RECEIPTS THIS PAGE		RECEIPT AMOUNT	9,000.00

*SEE FOOTNOTE ON LAST PAGE OF LINE 17A

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Dole for President Exploratory Committee, Inc.

* The Committee was unable to determine if a contribution in excess of $1,000 (but written on a joint checking account) was intended as a joint contribution.
Reattribution letters were sent to the contributors seeking their direction. After receiving the contributors' replies (but within sixty days at the latest) the Committee will either reattribute the amount if meant to be a joint contribution or refund the amount in excess of $1,000 if from only one person.

MUR 3687

JOHN W. KING
31 BUCKINGHAM ROAD, NORWOOD, MASSACHUSETTS 02062

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

91 DEC -3 AM 11:06

AREA CODE 617 762-5210

November 26, 1991

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
91 DEC -3 PM 3:46

Mr. Jeffrey Long
Office of the General Counsel
Federal Election Commission
Washington, DC 20463

RE: MUR 3309

Dear Mr. Long:

This is in response to the letter dated November 21, 1991 from Chairman McGarry concerning a possible violation by me of the Federal Election Campaign Act of 1971 ("the Act").

The facts are these:

On March 9, 1988 I issued a check for $2,500 payable to the Dole for President Committee.

On July 11, 1988 I received a check for $1,500 from the Dole for President Committee returning the excess contribution. This check was received for deposit by the Bank on July 14. A copy of the deposit advice is enclosed.

I was not aware of the $1,000 limitation on contributions when I issued the check for $2,500.

While the failure of the Dole Committee to return the excess contribution within 60 days may put me in technical violation of the Act, this was not within my control.

Since the Dole for President Committee actually retained only the $1,000 contribution permitted by the Act, I ask that no action be taken against me.

With best regards,

J W King

John W. King

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P.O.. BOX 2197 BOSTON MA 021[redacted]

BANK [redacted]EW ENGLAND,N.A.
JULY 14, 1988 I

CUSTOMER TRANSACTION ADVICE

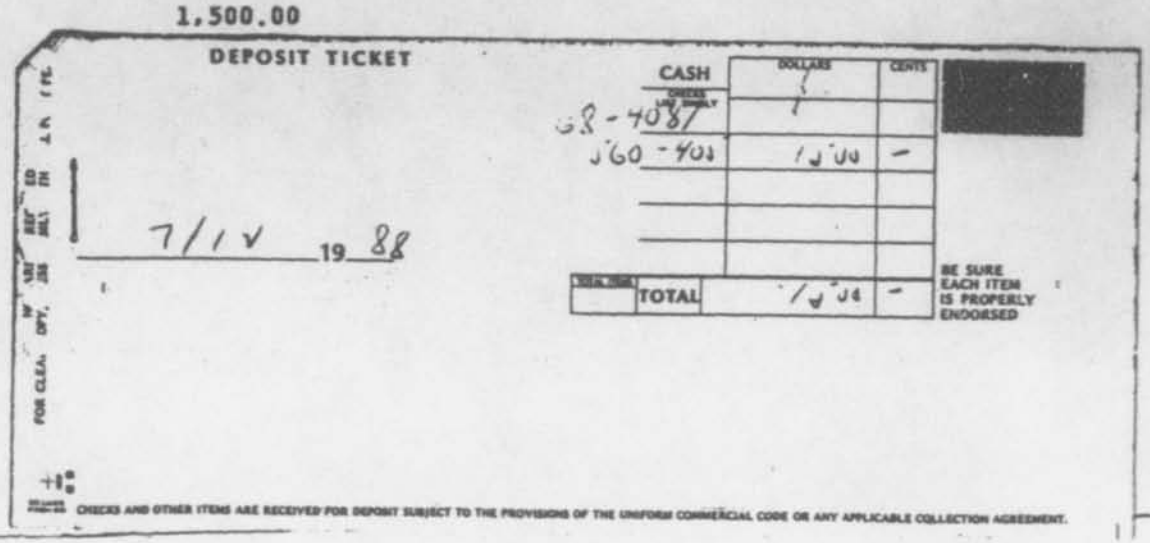
JOHN W KING
PRICILLA Y KING
31 BUCKINGHAM RD
NORWOOD MA 02062

ACCOUNT NUMBER:

THE FOLLOWING TRANSACTION(S) DESCRIBED BELOW WERE RECEIVED BY THE BANK AND PROCESSED ON JULY 14, 1988

WE HAVE CREDITED YOUR NOW ACCOUNT WITH THE FOLLOWING MAILED DEPOSITS:

1,500.00



THE BALANCE(S) OF YOUR ACCOUNT AS OF END OF BUSINESS 07-14-88 WERE:

NOW

IF THERE ARE ANY DISCREPANCIES NOTED ON THE INFORMATION PRINTED ABOVE INQUIRIES MAY BE MAILED TO:

BANK OF NEW ENGLAND, N.A.
P.O. BOX 2197 M02ADJ
BOSTON, MA 02106
ATTN: ADJUSTMENT DEPT.

OR CALL: 397-3000

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 26, 1991

MEMORANDUM

TO: The Commission

FROM: Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

SUBJECT: Erroneous Finding in MUR 3309

On Tuesday, October 29, 1991, the Commission approved the General Counsel's recommendations contained in the First General Counsel's Report, dated August 26, 1991, in MUR 3309 (Dole for President, et al.).

Among the recommendations approved was one to find reason to believe Rebma Obermayer had violated 2 U.S.C. § 441a(a)(1)(A) for making a $5,000 excessive contribution by failing to receive a timely refund from the Dole for President Committee. This name was taken from the audit workpapers listing the excessive contributors. A copy of the relevant page of these workpapers is attached. Attachment 1.

When staff of this Office sought to ascertain the addresses for the individual contributors, staff discovered that the "Rebma Obermayer" contribution was actually a $5,000 contribution from a Philadelphia law firm named Obermayer, Rebmann, Maxwell & Hippel. A copy of the page of the Dole for President Committee's reports disclosing this contribution is attached. Attachment 2. Staff of this Office has contacted the Pennsylvania Secretary of State's office and ascertained that this law firm is not incorporated.

Commission regulations at 11 C.F.R. § 110.1(e) explain that a contribution from a partnership is to be attributed to both the partnership and each partner in proportion to his or her share or by agreement of the partners as long as only the profits of the contributing partners are used to make the contribution in proportion to the attribution of the contribution. A partnership contribution shall not exceed the limitation for an individual who contributes to a federal candidate committee or $1,000 per election. Because partnership contributions are also attributed

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to the partners, as outlined above, it follows that the recipient committee must report the contribution as being received from the partnership and the partners. The Dole for President Committee did not report this attribution. Therefore, there is reason to believe they have also violated 2 U.S.C. § 434(b).

Therefore, this Office recommends that the Commission rescind the finding against Rebma Obermayer and instead make the reason to believe finding against Obermayer, Rebmann, Maxwell & Hippel. A revised factual and legal analysis is also attached for approval. This Office further recommends that the Commission also find reason to believe the Dole for President Committee and James L. Hagen, as treasurer, violated 2 U.S.C. § 434(b). The attached factual and legal analysis for the Dole for President Committee is the same one previously approved by the Commission with the appropriate revisions and additions to account for the excessive partnership contribution and the reporting violations.

RECOMMENDATIONS

1. Rescind the reason to believe finding made on October 29, 1991, that Rebma Obermayer violated 2 U.S.C. § 441a(a)(1)(A).

2. Find reason to believe Obermayer, Rebmann, Maxwell & Hippel violated 2 U.S.C. § 441a(a)(1)(A).

3. Find reason to believe the Dole for President Committee and James L. Hagen, as treasurer, violated 2 U.S.C. § 434(b).

4. Approve the attached factual and legal analyses and appropriate letters.

Attachments
1. Audit workpaper
2. Committee's report
3. Obermayer, Rebman, et al. Factual & Legal Analysis
4. Dole Factual & Legal Analysis

Staff person: Jeffrey D. Long

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Dole for President, et al.	)	MUR 3309
	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on November 29, 1991, the Commission decided by a vote of 6-0 to take the following actions in MUR 3309:

1. Rescind the reason to believe finding made on October 29, 1991, that Rebma Obermayer violated 2 U.S.C. § 441a(a)(1)(A).

2. Find reason to believe Obermayer, Rebmann, Maxwell & Hippel violated 2 U.S.C. § 441a(a)(1)(A).

3. Find reason to believe the Dole for President Committee and James L. Hagen, as treasurer, violated 2 U.S.C. § 434(b).

(continued)

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4. Approve the factual and legal analyses, and appropriate letters, as recommended in the General Counsel's Memorandum dated November 26, 1991.

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

Attest:

11-29-91
Date

Marjorie W. Emmons
Secretary of the Commission

Received in the Secretariat: Tues., Nov. 26, 1991 10:07 a.m.
Circulated to the Commission: Tues., Nov. 26, 1991 4:00 p.m.
Deadline for vote: Fri., Nov. 29, 1991 4:00 p.m.

bjf

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 5, 1991

Scott E. Morgan, Esquire
1618 Inverness Drive
Lawrence, Kansas 66047

RE: MUR 3309
Dole for President Committee, Inc.

Dear Mr. Morgan:

On October 29, 1991, the Federal Election Commission found that there is reason to believe your clients, the Dole for President Committee ("the Committee") and James L. Hagen, as treasurer, violated 2 U.S.C. §§ 434, 441a(b)(1)(A), 441a(f) and 441b, provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"), and 26 U.S.C. § 9035(a). On November 29, 1991, the Commission further found reason to believe the Committee violated 2 U.S.C. § 434(b). 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 the Committee and James L. Hagen, as treasurer. 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 clients, 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

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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.

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 enclosed a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Anne A. Weissenborn, the attorney 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

RESPONDENTS: Dole for President Committee and James L. Hagen, as treasurer MUR 3309

I. GENERATION OF MATTER

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. 2 U.S.C. § 437g(a)(2). It is based on an audit of the Dole for President Committee pursuant to 26 U.S.C. § 9038(a) to determine whether there had been compliance with the provisions of the Federal Election Campaign Act of 1971, as amended ("the Act") and of the Presidential Primary Matching Payment Account Act ("Matching Payment Act"). See also, 26 U.S.C. § 9039(b) and 11 C.F.R. § 9038.1(a)(2).

II. FACTUAL AND LEGAL ANALYSIS

A. Excessive State Expenditures

1. Background

For purposes of the Act and the Matching Payment Act a contribution includes any gift, subscription, loan, advance, or deposit of money or anything of value made for purposes of influencing a federal election. 2 U.S.C. § 431(8)(A) and 11 C.F.R. § 100.7(a); U.S.C. § 9032(4) and 11 C.F.R. § 9032.4. "Anything of value" includes in-kind contributions. 11 C.F.R. § 100.7(a)(1)(iii).

When an individual becomes a candidate, any funds received, loans obtained or disbursements made prior to becoming a

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candidate in connection with his or her campaign shall be deemed to have been received, obtained or made as an agent of his or her authorized committee. 11 C.F.R. § 101.2(b)

Funds received and payments made solely for the purpose of determining whether an individual should become a candidate are not contributions or expenditures for purposes of the Act. Examples of activities permissible under this exemption include, but are not limited to, conducting a poll, telephone calls, and travel. If the individual subsequently becomes a candidate, the funds received and expended would become contributions subject to the reporting requirements of the Act. Such contributions and expenditures must be reported with the first report filed by the principal campaign committee, regardless of the date the funds were received or expended. 11 C.F.R. §§ 100.7(b)(1), 100.8(b)(1), and 101.3.

The Commission has addressed the issue of testing the waters in Advisory Opinion ("AO") 1985-40 and Advisory Opinion 1986-6, both of which concerned an unauthorized political committee associated with a prospective presidential candidate. In AO 1985-40, the Commission concluded that expenses paid by an unauthorized political committee for an individual considering whether to become a candidate would be considered testing the waters expenses, if such activities related to the potential candidacy and that individual subsequently became a candidate. Such expenditures would be deemed qualified campaign expenses and would be subject to the candidate's expenditure limitations under 2 U.S.C. § 441a(b). In AO 1986-6, the Commission determined that

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expenditures made for testing the waters purposes must be treated as in-kind contributions to the candidate.

No candidate for the office of President of the United States, who is eligible under Section 9033 of Title 26 to receive payments from the Secretary of the Treasury, may make expenditures in any one state aggregating in excess of the greater of 16 cents multiplied by the voting age population of the state, or $200,000.00, as adjusted by changes in the Consumer Price Index. 2 U.S.C. §§ 441a(b)(1)(A) and 441a(c) and 26 U.S.C. § 9035(a). Except for expenditures exempted under 11 C.F.R. § 106.2, expenditures incurred by a candidate's authorized committee(s) for the purpose of influencing the nomination of that candidate for the office of President with respect to a particular state shall be allocated to that state. 11 C.F.R. § 106.2(a)(1).

The categories of expenditures exempted from state allocation are outlined at 2 U.S.C. § 431(9)(B)(vi) and 11 C.F.R. §§ 106.2(b)(2)(v) and 106.2(c). National campaign expenditures, including operating expenditures related to a national campaign headquarters, national advertising, and nationwide polls, are not allocable, nor are media production costs whether or not the media advertising is used in more than one state. 11 C.F.R. § 106.2(c)(1) and (2). Interstate travel and telephone calls are also exempt. 11 C.F.R. §§ 106.2(b)(2)(v) and 106.2(c)(4). An amount equal to 10 percent of campaign workers salaries and overhead expenditures in a particular state may be excluded from allocation to that state as an exempt compliance cost. An

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additional amount equal to 10 percent of such salaries and overhead expenditures in a particular state may be excluded from allocation to that state as exempt fundraising expenditures, but this exemption shall not apply within 28 calendar days of the primary election. 2 U.S.C. § 431(9)(B)(vi) and 11 C.F.R. § 106.2(c)(5). Overhead expenditures include, but are not limited to, rent, utilities, office equipment. furniture, supplies, and telephone service base charges. 11 C.F.R. § 106.2(b)(2)(iv). Overhead expenses of a committee's regional office or other office which services more than one state are to be allocated on a "reasonable and uniformly applied basis." 11 C.F.R. § 106.2(b)(2)(iv)(B).

2. Audit Determinations

For the 1988 presidential primary elections, the expenditure limitation for the State of Iowa was $775,217.60; for the State of New Hampshire the limitation was $461,000.00. The Committee initially provided computerized worksheets to the Audit Division that showed allocable costs to Iowa and New Hampshire of $793,230.82 and $462,462.20 respectively, as of October 31, 1988. These totals agreed with the totals disclosed by the Committee on its FEC Form 3P, Page 3, dated March 31, 1989. Thus, based upon the information provided by the Committee itself, the Committee exceeded the expenditure limitations by $18,013.22 in Iowa and by $1,462.20 in New Hampshire.

In its response to the Interim Audit Report, the Committee stated that it agreed with certain additional allocations to Iowa and New Hampshire for intrastate telephone calls and broadcast

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media. The audit had calculated an additional $23,280.46 in allocations to Iowa and an additional $1,696.44 to New Hampshire for intrastate calls. It also had allocated an additional $2,595.98 to Iowa and an additional $37,295.89 to New Hampshire for broadcast media. Thus, the original totals submitted by the Committee, plus the additional allocations agreed to by the Committee, resulted in the Committee's having exceeded the expenditure limits by at least $43,889.66 in Iowa and $40,454.53 in New Hampshire.

The Committee at the Interim Audit Report stage continued to take issue with other audit determination figures. After considering the Committee's arguments and staff recommendations, the Commission included in the initial determination the following additional allocations:

Additional Audit Allocations	Iowa	New Hampshire
1. Dole Travel	$28,450.36	$13,997.06
2. Fundraising Exemptions-Direct Mail Costs	51,935.78	43,618.56
3. New England Regional Office	-0-	54,341.62
4. Compliance Exemptions-Media Costs	16,061.46	13,961.15
5. Media Commissions (Production)	2,664.64	2,988.08
6. Travel and Salary Costs	73,161.62	66,349.25
7. Non-Travel and Salary Costs	35,179.99	31,085.16
8. Polling Expenses	21,497.25	31,636.50
9. Testing the Waters Expenditures Made by Campaign America	33,889.32	4,517.29
Total amount in dispute:	**$262,840.42**	**$262,494.67**

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On April 29, 1991, the Commission made an initial determination that the Committee be required to repay $170,043.82 ($609,679.28 in excessive expenditures in Iowa and New Hampshire times the repayment ratio of 27.8907 percent).

In its response to the Commission's initial repayment determination, the Committee has continued to oppose inclusion of the following four items cited above: (1) Dole travel, (2) expenses of the New England Regional Office, (3) media commissions (production), and (4) testing-the-waters expenditures made by Campaign America.[1] By no longer opposing the other

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1. The Committee's treasurer, in opposing the inclusion of Dole travel expenses, stated that a 25 percent exemption was taken with regard to costs of travel incurred by Senator and Elizabeth Dole to reflect the fundraising efforts associated with their intrastate travel and attendance at events. According to the treasurer, whenever Senator Dole and Elizabeth Dole traveled, they made requests for contributions. The Committee selected 25 percent as a "reasonable" judgment of what these requests were worth to the Committee's fundraising efforts. The Commission, in the absence of documentation supporting the Committee's position, has not found these expenditures to be covered by the fundraising exemption and therefore has found them allocable.

The Committee continues to oppose the inclusion of expenses of an office located in Manchester, New Hampshire which was designated the New England regional office. Certain expenditures were allocated to this office by the Committee as regional expenses, of which 60% were then allocated to New Hampshire. The Commission allocated 100% of some of these expenditures to New Hampshire in light of information indicating that the office functioned primarily as the Committee's New Hampshire office.

Also opposed by the Committee is the inclusion of certain media commissions. The Committee paid Ringe Media Inc. ("RMI") a commission equal to 1.5% of gross air time costs for all placements of commercials produced by RMI. The Committee did not make allocations to Iowa and New Hampshire for the 1.5% commission paid to RMI, arguing that the commission payments were part of non-allocable production costs. The Commission has included the commissions as allocable media placement costs.

Finally, the Committee opposes the Commission's inclusion of payments made by Campaign America as allocable testing-the-waters expenditures.

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expenditures listed above, the Committee apparently concedes that it exceeded the Iowa expenditure limitation of $775,217.60 by at least $241,725.76 ($43,889.66 previously acknowledged plus $197,836.10 in additions included in the Final Audit Report), and the New Hampshire expenditure limitation of $461,000 by at least $227,105.15 ($40,454.53 previously acknowledged plus $186,650.62). All expenditures that the Commission decides, as part of the repayment process, are allocable to these states will be incorporated into this enforcement matter and appropriate adjustments made.

As explained above, based solely upon the original allocations to Iowa and New Hampshire made by the Committee and upon the additional allocations expressly accepted by the Committee for credit card telephone calls and broadcast media, the Committee exceeded the state by state expenditure limit by at least $43,889.66 in Iowa and $40,454.53 in New Hampshire. As stated above, the additional allocations seemingly no longer being contested by the Committee would raise those figures to $241,725.76 and $227,104.15 respectively. When the allocations still being contested are added, the amounts of excessive expenditures would be $306,730.08 and $302,949.20.

Thus, there is reason to believe that the Dole For President Committee and James L. Hagen, as treasurer, violated 2 U.S.C. § 441a(b)(1)(A) and 26 U.S.C. § 9035(a).

B. Testing the Waters -- Campaign America

No multi-candidate political committee shall make contributions to any candidate and his authorized political

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committee with respect to any election for Federal office which, in the aggregate, exceed $5,000.00. 2 U.S.C. § 441a(a)(2)(A) and 11 C.F.R. § 110.2(a)(1),

Campaign America is a registered multi-candidate committee associated with the candidate.[2] According to a Campaign America newsletter, Senator Dole is the "Honorary Chairman" of Campaign America.

A review of Campaign America records made available in response to a subpoena issued during the audit of the Dole Committee revealed that at least 19 Campaign America-sponsored events, speeches, or meetings were held in Iowa between March 31, 1986, and February 23, 1987. Four of these events were apparently testing the waters expenditures made by Campaign America on behalf of the Committee: (1) a February 7, 1987, town meeting in Orange City, Iowa; (2) a February 12, 1987, town meeting in Dubuque, Iowa; (3) a February 22, 1987, town meeting in Des Moines, Iowa; and (4) a February 23, 1987, breakfast meeting in Davenport, Iowa.[3] The costs associated with the four events totaled $14,684.35.

These four events appear to have been similar to the events of the same name sponsored by the Committee. Invitation postcards for the town meetings sponsored by the Committee and by Campaign America were printed by the same Iowa firm and employed

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2. Campaign America registered with the Commission in March 1978.

3. The Dole Committee has continued to disagree with the treatment of Campaign America expenditures as testing the waters payments on behalf of Senator Dole's presidential candidacy.

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the same format and picture. The postcard for the February 22, 1987, event began with the message, "With the 1986 campaign behind us, Republican voters and candidates clearly have major challenges ahead in 1988. During this meeting I would like to hear your views and concerns while sharing some of my own with you regarding our shared Republican future."[4] The printing bill for the February 22 postcards also covered a flyer entitled "Bob Dole on the Issues" which contained the quotation, "If Senator Dole is running for the White House, he's off on the right foot."

Campaign America also supplied the Commission with a memorandum dated February 18, 1987, from Beverly Hubble to Senator Dole containing "Iowa talking points." The talking points memorandum begins with a section entitled "Quad Cities Issues." On February 23, 1987, Campaign America paid for the above-cited breakfast meeting for 53 people in Davenport, Iowa, one of the Quad Cities.[5] Also included in this memo was a section entitled "Offer Iowans a Friend in the White House," which read, "If the candidates are confronted with the question: How should your PAST commitments assure IOWANS that if you are elected Iowa will have a friend in the White House . . . . It's likely NO ONE could answer that challenge as effectively as RFD. So we should make sure that question is asked . . . and asked . . . and asked."

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4. No samples of the other postcard invitations are available.

5. The Quad Cities are comprised of the following: Davenport, IA; Bettendorf, IA; Moline, IL; and Rock Island, IL.

In addition to finding that the $14,684.35 in Campaign America expenditures for the four events consisted of allocable testing the waters payments, the Commission has determined that Campaign America staff expenses associated with the same events were likewise allocable testing the waters payments and thus allocable. These expenditures totaled $10,214.70.

Campaign America also paid a firm $8,010.67 to purchase and edit an Iowa Republican voter tape previously compiled at Campaign America's expense, to print labels, to keypunch telephone canvas card data, to update the master file with survey data, and to print selected "Dole favorable" labels. In addition, Campaign America paid the same vendor $979.60 for selecting and printing Dole favorables, for computer tapes of Dole favorables, and for selecting and printing labels for persons in selected Iowa counties. It appears from the invoices that the survey data was used with respect to Campaign America events in Iowa in January and February 1987. The Committee used the same vendor for its own activities.

A review of Campaign America records also revealed 117 payments in New Hampshire totaling $3,136.26 to various towns for voter lists in late 1986 and early 1987, plus $2,223.16 in telephone costs for a business telephone, the number of which was later used by the Committee and $1,381.03 of which cost was allocable to New Hampshire. The Commission has deemed these costs testing the waters expenditures made by Campaign America on behalf of Dole for President.

As testing the waters expenditures, the above Campaign

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America payments became in-kind contributions to the Committee which were subject to the $5,000.00 limitation at 2 U.S.C. § 441a(a)(2)(A). Because these Campaign America expenditures totaled $38,406.61, or $33,406.61 in excess of the limitation, there is reason to believe that Dole for President violated 2 U.S.C. § 441a(f).

C. Corporate Contributions and Corporate Aircraft

It is unlawful for any corporation to make a contribution or expenditure in connection with any election to any political office, or in connection with any primary election or political convention or caucus held to select candidates for any political office, or for any corporation whatever to make a contribution or expenditure in connection with any election at which presidential and vice presidential electors or a Senator or Representative in, or a Delegate or Resident Commissioner to, Congress are to be voted for, or in connection with any primary election or political convention or caucus held to select candidates for any of the foregoing offices. 2 U.S.C. § 441b(a). It is also unlawful for any candidate, political committee, or other person knowingly to accept or receive any contribution prohibited by this section, or any officer or any director of any corporation to consent to any contribution or expenditure by the corporation, prohibited by this section. Id.

The treasurer of a committee is responsible for examining all contributions received for evidence of illegality. 11 C.F.R. § 103.3(b). When contributions received present genuine questions as to whether they were made by corporations, within

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ten days of receipt, the treasurer can deposit the funds into a campaign depository or return them to the contributor. If any such contribution is deposited, the treasurer shall make at least one written or oral request for evidence of the legality of the contribution. If the contribution cannot be determined to be legal, the treasurer shall within thirty days of the treasurer's receipt of the contribution, refund the contribution to the contributor. 11 C.F.R. § 103.3(b)(1). However, if the treasurer determined at the time the contribution was received that it was not illegal, but later discovers its illegality based on new evidence not available to the committee at the time of receipt or deposit, the treasurer shall refund the contribution within thirty days of discovering its illegality. 11 C.F.R. § 103.3(b)(2). In addition, any contribution which appears to be illegal and which is deposited into a campaign depository shall not be used for any disbursements by the political committee until the contribution has been determined to be legal. The political committee must either establish a separate account in a campaign depository for such contributions or maintain sufficient funds to make all such refunds. 11 C.F.R. § 103.3(b)(4).

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1. <u>In-Kind Corporate Contributions</u>

The examination and audit of the Dole for President Committee determined that the Committee received 213 contributions totaling $68,043.38, which were identified as contributions from corporations. Included in this total are two in-kind

contributions totaling $3,750.00.[6] The review of the Committee's vendor records indicated that the Committee made a payment of $12,000 to H & W Aviation for use of a chartered aircraft. This amount appears to be $2,750 less than the fair market price for the services provided. In its response to the Interim Audit Report, the Committee contends that there was a dispute as to the amount charged for the services provided and that the payment of the $12,000 was not a reduced price. In addition, the Committee alleges that the amount of $12,000 represented the fair market price for the services provided. A letter from H & W Aviation stated that the $12,000 paid to H & W Aviation was a discount from the standard price and was reached as a compromise between the $14,750 price and the "partners" price of $9,800.[7] According to the audit, a review of the documentation in this matter failed to present any evidence which would indicate that the amount paid was not a discount. The Committee has also failed to submit any further documentation evidencing its contention that the $12,000 represents the fair market value for the services provided. Thus, it appears that the $2,750.00 discount from H & W Aviation would constitute an in-kind contribution from a corporation in violation of the Act.

In addition to the $12,000 payment to H & W Aviation, the

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6. The third in-kind contribution identified in the referral totaling $70.82 was clarified by the Committee's response and has been deleted.

7. The meaning of "partners" price is not entirely clear. This Office is assuming it refers to the rental price charged when the aircraft's owners use it.

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Committee's vendor records also indicated that the Committee made a reimbursement of $9,905.00 to Owen & Associates for use of a private airplane.[8] This amount appears to be $1,000 less than the usual and normal charge for the service of the airplane. It appears from the evidence on hand that the charter rate for the aircraft was $150.00 per hour and that the Committee used 72.7 hours. Therefore the actual total due for the use of the aircraft was $10,905 ($150.00 X 72.7 hours = $10,905).

The Committee contends that the $1,000 difference was predicated on the $1,000 transportation expense exemption pursuant to 11 C.F.R. § 100.7(b)(8). Insomuch as the Committee did not proffer any documentation which would evidence the possibility that an individual paid for the aircraft from personal funds, the Committee has failed to support their contention that the $1,000 difference was not a corporate in-kind contribution. Furthermore, 11 C.F.R. § 100.7(b)(8) applies only to individuals. Thus, it appears that the $1,000 reduction from the usual and normal charge for the service of Owen & Associates' aircraft would constitute an in-kind contribution from a corporation in violation of the Act.

Therefore, there is reason to believe that the Dole for President Committee violated 2 U.S.C. § 441b(a) by accepting in-kind corporate contributions from H & W Aviation and Owen & Associates.

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8. The payments to Owen & Associates were not made in advance of the use of the aircraft. The $9,905.00 payment is discussed in the following section covering the use of corporate aircraft.

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2. Apparent Corporate Contributions

As noted, the Committee received 213 contributions totaling $68,043.38, all of which the audit has identified as contributions from corporations which were not refunded or not refunded in a timely manner. The audit identified 25 refunds out of the 213, totaling $7,201.00, which were not made timely. The 213 contributions included the 2 corporate in-kind contribution discussed in the previous section. It should also be noted a separate account was not established by the Committee. However, the Committee appears to have maintained sufficient funds with which to make refunds.

In response to the Interim Audit Report, the Committee submitted documentation for some of the corporate contributions which consisted of either signed contributor letters and check copies indicating that the funds were personal. Based upon these documents, coupled with information from various Secretaries of State, the Audit deleted 37 contributions totaling $7,492.70 from its initial finding in reaching the 213 remaining corporate contributions. As to the other contributions, the Audit was able to obtain information from the various Secretaries of State which indicated that they had corporations in their states with the same names and addresses as to the remaining contributors. The checks also indicated the contributor was a business. In some cases this information was in conflict with the information which the Audit had received from the Committee indicating that these contributions were from non-corporate sources. Therefore, these items are still considered as apparent corporate contributions.

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The Committee also conceded that 11 of the 213 contributions were "probably corporate," but failed to submit any evidence indicating that refunds were made as to the these contributions. The Committee has had an opportunity to provide information to demonstrate that the above-mentioned contributions were not from a corporate source. Based upon the foregoing, it appears that the Committee has violated 2 U.S.C. § 441b by accepting prohibited corporate contributions.

Therefore, there is reason to believe that the Dole for President Committee violated 2 U.S.C. § 441b(a) by knowingly accepting corporate contributions.

3. Use Of Corporate Aircraft

A candidate, candidate's agent, or person traveling on behalf of a candidate who uses an airplane which is owed or leased by a corporation, other than a corporation licensed to offer commercial services for travel in connection with a federal election must, in advance, reimburse the corporation. 11 C.F.R. § 114.9(e). In the case of travel to a city served by regularly scheduled commercial service, the reimbursement must be the first class air fare; in the case of travel to a city not served by a regularly scheduled commercial service, it must be the usual charter rate.

The audit review of the Committee's reports and records indicated that the Committee used private aircraft owned by corporations for campaign related travel. This review indicated that the Committee made 26 payments, totaling $54,264.85 to 15 corporations which were not made in advance as required by

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11 C.F.R. § 114.9(e). It does not appear that these corporations were licensed to offer commercial services for travel. It also appears that payments for travel ranged from 1 day to 409 days after the date of travel. The audit notes that 13 of the payments, totaling $19,787.00, were made within 5 days after the dates of travel.

The audit review of the Committee's documentation also discovered that the Committee chartered an aircraft from Becon Construction Company, Inc. ("Becon"). The documentation indicated that Becon rendered $9,987.85 in travel services to the Committee, but that the Committee only paid $7,512.85. It is mentioned in the Committee's documentation that the difference of $2,475.00 in air fare was not authorized by the Committee, and that the difference was paid by an individual and not a corporation. The Committee has failed to offer any documentation that the $2,475.00 difference was paid by an individual and not a corporation.

It appears that the Committee has violated the Act by not reimbursing in advance 15 corporations for air travel totaling $54,264.85. It also appears that the Committee has violated the Act by accepting an in-kind contribution of $2,475.00 from Becon. This amount is included in the above-mentioned $54,264.85 total.

Therefore, there is reason to believe the Dole for President Committee violated 2 U.S.C. § 441b(a) by failing to reimburse 15 corporations in advance for use of their aircraft and by accepting a $2,475.00 in-kind contribution from Becon Construction Company, Inc.

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D. Excessive Contributions

No person shall make contributions to any candidate with respect to any election for Federal office which, in the aggregate, exceed $1,000.00. 2 U.S.C. § 441a(a)(1)(A). No multicandidate political committee shall make contributions to any candidate and his authorized political committees with respect to any election for Federal office which, in the aggregate, exceed $5,000.00.[9] These limitations apply separately to each election, except that all elections held in any calendar year for the office of President of the United States (except a general election for such office) shall be considered to be one election. 2 U.S.C. § 441a(a)(6). No candidate or political committee shall knowingly accept any contributions in violation of these limitations. 2 U.S.C. § 441a(f).

Commission regulations explain that contributions which exceed the contribution limitations may be deposited into a campaign depository. If any such contributions are so deposited, the treasurer may request redesignation or reattribution of the contribution by the contributor in accordance with Commission regulations. If a redesignation or reattribution is not

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9. A multicandidate political committee means any committee that has been registered with the Commission for at least six months and has received contributions from more than 50 persons and, except for a state political party organization, has made contributions to five or more candidates. 2 U.S.C. § 441a(a)(4). A committee that has not met these requirements is subject to the $1,000 per election limit. Furthermore, an authorized political committee of a candidate may not contribute more than $1,000 to any other candidate for federal office regardless of whether it would otherwise meet the requirements of Section 441a(a)(4). 2 U.S.C. § 432(e)(3).

obtained, the treasurer shall, within 60 days of the treasurer's receipt of the contribution, refund the contribution to the contributor. 11 C.F.R. § 103.3(b)(3). The regulations further provide that any contribution which appears to be illegal and which is deposited into a campaign depository shall not be used for any disbursements by the political committee until the contribution has been determined to be legal. The political committee must either establish a separate account in a campaign depository for such contributions or maintain sufficient funds to make such refunds. 11 C.F.R. § 103.3(b)(4).

1. **Apparent Excessive Contributions from Individuals**

Commission regulations provide that any contribution made by more than one person, except for a contribution made by a partnership, shall include the signature of each contributor on the check, money order, or other negotiable instrument or in a separate writing. A contribution made by more than one person that does not indicate the amount to be attributed to each contributor shall be attributed equally to each contributor. If a contribution to a candidate on its face or when aggregated with other contributions from the same contributor exceeds the limitations on contributions, the treasurer may ask the contributor whether the contribution was intended to be a joint contribution by more than one person. A contribution shall be considered to be reattributed to another contributor if the treasurer of the recipient political committees asks the contributor whether the contribution is intended to be a joint contribution by more than one person and informs the contributor

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that he or she may request the return of the excessive portion of the contribution if it is not intended to be a joint contribution and, within sixty (60) days from the date of the treasurer's receipt of the contribution, the contributors provide the treasurer with a written reattribution of the contribution, which is signed by each contributor and which indicates the amount to be attributed to each contributor if equal attribution is not intended. 11 C.F.R. § 110.1(k). Commission regulations also provide special rules for the attribution of partnership contributions. 11 C.F.R. § 110.1(e).

The examination and audit of the Dole for President Committee initially identified 549 contributions from 422 individuals and one partnership totaling $246,187.31 that were in excess of the applicable limitations and had not been refunded, reattributed, or redesignated in a timely fashion. A list of these contributions was provided to the Committee at the exit conference.[10] The audit also determined that the Committee had not established a separate account for the deposit of contributions which were possibly excessive or a method to monitor the amount to be kept in the Committee's accounts while the permissibility of the contributions was determined. The audit determined that the Committee appeared to have had sufficient permissible funds to have made the refunds.

These contributions included 397 contributions from 333

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10. The list mistakenly identified the partnership contribution from Obermayer, Rebmann, Maxwell & Hipple of Pittsburgh as "Obermayer, Rebma."

individuals and one partnership totaling $206,670.21 which had been untimely refunded with the average number of days from date of deposit to date of refund being 108. An additional 139 contributions from 76 contributors totaling $32,856.60 were redesignated by the contributors and transferred to the compliance fund, but not in a timely manner. The average number of days from the date of deposit to the date of refund was 115. Four contributions from four contributors totaling $1,505.00 had been refunded but the refund checks had not cleared the Committee's account. Nine contributions from nine contributors totaling $5,155.00 had not been refunded. In response to the Interim Audit Report, the Committee provided certain information regarding the nine contributions that had not been refunded and the four refund checks that had not been cashed. The audit determination was adjusted to delete four contributions totaling $55.50.

Thus, the audit concluded that the Dole for President Committee had accepted 545 contributions in excess of the applicable limits from 419 contributors totaling $246,131.81 that were not timely refunded, redesignated or reattributed.

2. **Apparent Excessive Contributions from Political Committees**

The examination and audit of the Committee initially determined that the Committee had accepted contributions from 13 political committees that exceeded the applicable limitations by $19,670. Four of these excessive contributions totaling $8,000.00 had been refunded but not in a timely manner. The

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average number of days from date of deposit to date of refund was 116. One excessive contribution totaling $2,000.00 was redesignated to the compliance fund but was not transferred in a timely manner (106 days). The remaining excessive contributions totaling $9,670 had not been refunded.

In response to the Interim Audit Report, the Committee stated it had no record of receiving 10 contributions totaling $14,120. The audit located check copies for 6 of these 10 contributions totaling $12,050.00 from the Committee's contribution batch records. The Committee conceded two contributions totaling $2,000.00 were excessive and stated a refund would be made, but to date no evidence of such refunds has been provided.

The audit further determined that four contributions totaling $795 were earmarked contributions. Two other contributions totaling $2,000.00 were reported by the Committee under the name of an individual, but no documentation was found to establish that they were earmarked. Two contributions totaling $1,500.00 appear excessive based on the contributing committee's reports.

Thus, the audit concluded that the Committee had accepted excessive contributions from 11 political committees totaling $18,875. The political committees making these excessive contributions and the excessive amounts are:

	Committee	Excessive Amount
1.	Arthur Young & CO. PAC	$2,500
2.	Dallas Citizens PAC	$1,000
3.	Fluor Corp. PAC	$2,000
4.	Good Gov't PAC	$1,000
5.	Hartford Insurance PAC	$2,000
6.	Johnston for Congress	$1,000
7.	Nat. Good Gov't Fund	$1,000

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8.	G.E. PAC	$2,000
9.	Small Biz PAC	$4,000
10.	Southwestern Bell PAC	$375
11.	Tele-Comm. PAC	$2,000
	Total	**$18,875**

The Dallas Citizens PAC terminated in 1988. Arthur Young & Company PAC is now known as Ernst & Young Los Angeles Political Action Committee.

3. Compliance Fund

Commission regulations permit a candidate to establish a legal and accounting compliance fund prior to being nominated as a major party candidate for President. 11 C.F.R. § 9003.3(a)(1)(i). Contributions which exceed the contributor's limitation for the primary election may be deposited in the compliance fund if the candidate obtains the contributor's redesignation of the contribution in accordance with 11 C.F.R. § 110.1. 11 C.F.R. § 9003.3(a)(1)(iii). If a candidate is not a candidate in the general election, any contribution made with respect to the general election shall be refunded, redesignated, or reattributed. 11 C.F.R. § 102.9(e). Such refunds, redesignations, and reattributions should be made within sixty (60) days from the date of the nomination for president by the party of the candidate who is not in the general election in accordance with 11 C.F.R. § 110.1(b)(3)(i).

The Dole for President Committee established a compliance fund in 1987 and registered it with the Commission. A total of $102,662.55 in funds were redesignated and transferred to the compliance fund in addition to $16,292.00 in direct contributions

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to the fund. Because the Republican Party nominated its candidate for President on August 17, 1988, the Committee should have refunded, redesignated, or reattributed these funds within sixty (60) days of August 17, 1988, or no later than October 16, 1988.

The fund reported $19,542.00 in refunds through September 30, 1988. In addition, letters were sent to all contributors offering them a choice of redesignating their contributions to the newly-established Penalty & Interest Fund or receiving a refund.[11] In response to this letter, contributors redesignated

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11. The letter was dated between August 9, 1988, and August 22, 1988, and signed by Scott Morgan, Chief Counsel for the Committee. It stated that the Committee had established the Penalty & Interest Fund "to pay any fines or penalties the Federal Election Commission might levy against Senator Dole and Dole for President after the completion of the FEC's current audit." The letter further noted that such a fund "is permitted under 11 C.F.R. § 9034.4(b)(4) of the Federal Election Commission regulations."

We note that this regulation provides that civil or criminal penalties paid pursuant to the Act are not qualified campaign expenses and cannot be defrayed from contributions or matching payments. The regulation further provides that any "amounts received or expended to pay such penalties shall not be considered contributions or expenditures but all amounts so received shall be subject to the prohibitions of the Act." It further adds that any "amounts received or expended under this section shall be reported in accordance with 11 CFR part 104." Although the Commission has not explicitly approved the establishment of separate penalty and interest funds, the language of the regulation would appear to permit a candidate to do so. The regulation does refer to "amounts received or expended" for the purpose of paying penalties and requires that they be reported. Since such funds are not contributions and since contributions or matching payments cannot be used to pay penalties, the establishment of a separate account would appear necessary. It would therefore follow that this separate account could register and report as a separate entity with the Commission. Moreover, transfers to such a fund from the compliance fund would also appear permissible when prior approval is first obtained from the contributor who is also given the option of requesting a refund.

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$50,814.00 to the Penalty & Interest Fund. The redesignation letters were date stamped as received back by the Committee between August 26, 1988, and September 22, 1988. Therefore, they were also made within the 60-day period.[12]

Thus, the remaining funds totaling $48,598.55 deposited into the compliance fund were not refunded or redesignated within 60 days. On January 25, 1991, the Committee submitted photocopies of 105 contribution refund checks totaling $48,748.55 dated January 16 and 17, 1991.[13] Only the front of these checks were provided. Therefore, the audit could not determine whether or not these contributions had actually been refunded.[14] We note that the compliance fund reported making $41,381.50 in refunds on January 16, 1991, with remaining cash on hand of $12,544.97.[15]

4. Summary

Based on the foregoing, there is reason to believe the Dole for President Committee violated 2 U.S.C. § 441a(f) by knowingly accepting excessive contributions from individuals and a

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12. The audit also noted that through September 30, 1988, the Penalty & Interest Fund had earned $6,035.18 in interest.

13. The difference between $48,598.55 and $48,748.55 was explained by a transfer of $325 from the compliance fund to the penalty & interest fund that should have only been $175. The treasurer had stated that the $150 would be transferred back to the compliance fund. Instead, the Penalty & Interest Fund reported a $150 payment on January 30, 1991, to the Dole for President Committee as a reimbursement for accounting services.

14. The audit also noted that any refund checks that remain outstanding are governed by 11 C.F.R. 9038.6 which would require that such funds be made payable to the United States Treasury.

15. This amount appears to represent those contributions for which the Committee did not have current addresses.

partnership totaling $246,131.81 and by knowingly accepting excessive contributions from political committees totaling $18,875 that were not redesignated, reattributed, or refunded in a timely manner, and by knowingly accepting contributions with respect to the general election through the compliance fund that were not refunded, redesignated, or reattributed within 60 days of the nomination of the Republican Party's candidate for President. Furthermore, there is reason to believe the Dole for President Committee violated 2 U.S.C. § 434(b) by not reporting the attribution of the Obermayer, Rebmann, Maxwell & Hipple partnership contribution to the appropriate partners.

E. Delegate Committees

The Act requires that each treasurer of a political committee file reports of receipts and disbursements in accordance with the provisions of 2 U.S.C. § 434(a). 2 U.S.C. § 434(a). A principal campaign committee is required to consolidate in each of its report the reports submitted to it by any authorized committees. 11 C.F.R. § 104.3(f).

The treasurer of a committee shall keep an account of: all contributions received by or on behalf of such committee; the name and address of any person who makes any contribution in excess of $50, together with the date and amount of such contribution by any person; the identification of any person who makes a contribution or contributions aggregating more than $200 during a calendar year, together with the date and amount of any such contribution; the identification of any political committee which makes a contribution, together with the date and amount of

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any such contribution; and the name and address of every person to whom any disbursement is made, the date, amount, and purpose of the disbursement, and the name of the candidate and the office sought by the candidate, if any, for whom the disbursement was made, including a receipt, invoice, or canceled check for each disbursement in excess of $200. 2 U.S.C. § 432(c). The treasurer must preserve all the above-mentioned records and copies of all reports required to be filed by this subchapter for three years after the report is filed. 2 U.S.C. § 432(d). Political committees must maintain records, including bank records, with respect to matters required to be reported. 11 C.F.R. § 104.14(b). These records must provide, in sufficient detail, the necessary information and data from which the reports and statements may be explained, verified, and checked for accuracy and completeness. 11 C.F.R. § 104.14(b).

A candidate may designate additional political committees in accordance with 11 C.F.R. § 102.13 to serve as committees which will be authorized to accept contributions or make expenditures on behalf of the candidate. 11 C.F.R. § 101.1(b). A delegate committee is a group of persons that receives contributions or makes expenditures for the sole purpose of influencing the selection of one of more delegates to a national nominating convention. 11 C.F.R. § 110.14(b)(2). A delegate committee which qualifies as a political committee under 11 C.F.R. § 100.5 must register with the Commission and report its receipts and disbursements in accordance with 11 C.F.R. Part 104. Id.

The audit indicates that the Dole Committee failed to report

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certain receipts and disbursements by delegate committees in its reports to the Commission. The audit also indicates that records regarding these receipts and disbursements were not maintained. The funds involved were those received and disbursed by eighteen delegate committees, fifteen of which were located in Illinois and three of which were located in Maryland.

The audit reviewed the Dole Committee records for the delegate committees and the delegate committees' records, many of which were incomplete. The audit also reviewed the reports which the delegate committees filed with the Commission.[16] In order to obtain more complete information, the Commission subpoenaed the bank records of the delegate committees. Using all of the aforementioned information, the Audit department determined that the Dole Committee failed to report $27,531.83 in receipts and $42,660.10 in disbursements regarding the delegate committees.

As a principal campaign committee, the Dole Committee was responsible for consolidating the information contained in reports submitted to it by authorized committees in the Committee's reports to the Commission.[17] Most of the delegate

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16. Many of the delegate committees filed some of the required disclosure reports. However, most of the delegate committees failed to file all of the required reports.

17. Senator Dole authorized thirteen of the delegate committees by amending his statement of candidacy. In response to the Interim Audit Report, the Committee stated that "DFP had three delegate committees in Maryland and 15 in Illinois." Therefore, it appears that the Dole Committee viewed all eighteen of the delegate committees as authorized committees despite the fact that the amendments to Senator Dole's statement of candidacy do not list all of these committees. For instance, most of the Illinois delegates committees are listed as authorized. Moreover, four of the five committees not listed on Senator Dole

committees filed a few reports directly with the Commission. Nevertheless, as they were authorized committees, the Dole Committee was responsible for filing a consolidated report which included all of the delegate committees' activity. Even if the delegate committees did not submit reports to the Committee or submitted incomplete reports to the Committee, the Committee was still responsible for obtaining the information and reporting the receipts and disbursements to the Commission in a consolidated report.

Based on the foregoing, there is reason to believe that the Dole for President Committee violated 2 U.S.C. § 434 by failing to report the receipts and disbursements of the eighteen delegate committees in its consolidated reports.

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(Footnote 17 continued from previous page)
statement of candidacy nevertheless filed statements of organizations identifying the Dole Committee as an affiliated committee. The remaining committee listed the Dole Committee treasurer as a signatory on its bank account. Therefore, we have treated all Illinois delegate committees as authorized.

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 5, 1991

Obermayer, Rebmann, Maxwell & Hippel
Packard Building
Philadelphia, PA 19102

RE: MUR 3309
Obermayer, Rebmann, Maxwell & Hippel

Dear Sir:

On November 29, 1991, the Federal Election Commission found that there is reason to believe Obermayer, Rebmann, Maxwell & Hippel ("Respondents") violated 2 U.S.C. § 441a(a)(1)(A), 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 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 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

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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.

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 enclosed a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Jeffrey D. Long, the staff person assigned to this matter, at (202) 219-3690.

Sincerely,

John Warren McGarry

John Warren McGarry
Chairman

Enclosures
Factual and Legal Analysis
Procedures
Designation of Counsel Form

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Obermayer, Rebmann, Maxwell & Hippel **MUR:** 3309

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. 2 U.S.C. § 437(a)(2). It is based on the audit of the Dole for President Committee pursuant to 26 U.S.C. § 9038(a).

No person shall make contributions to any candidate with respect to any election for Federal office which, in the aggregate, exceed $1,000.00. 2 U.S.C. § 441a(a)(1)(A). These limitations apply separately to each election, except that all elections held in any calendar year for the office of President of the United States (except a general election for such office) shall be considered to be one election. 2 U.S.C. § 441a(a)(6). No candidate or political committee shall knowingly accept any contributions in violation of these limitations. 2 U.S.C. § 441a(f).

Commission regulations explain that contributions which exceed the contribution limitations may be deposited into a campaign depository. If any such contributions are so deposited, the treasurer may request redesignation or reattribution of the contribution by the contributor in accordance with Commission regulations. If a redesignation or reattribution is not obtained, the treasurer shall, within 60 days of the treasurer's receipt of the contribution, refund the contribution to the

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contributor. 11 C.F.R. § 103.3(b)(3).

Commission regulations provide that any contribution made by more than one person, except for a contribution made by a partnership, shall include the signature of each contributor on the check, money order, or other negotiable instrument or in a separate writing. A contribution made by more than one person that does not indicate the amount to be attributed to each contributor shall be attributed equally to each contributor. If a contribution to a candidate on its face or when aggregated with other contributions from the same contributor exceeds the limitations on contributions, the treasurer may ask the contributor whether the contribution was intended to be a joint contribution by more than one person. A contribution shall be considered to be reattributed to another contributor if the treasurer of the recipient political committees asks the contributor whether the contribution is intended to be a joint contribution by more than one person and informs the contributor that he or she may request the return of the excessive portion of the contribution if it is not intended to be a joint contribution and, within sixty (60) days from the date of the treasurer's receipt of the contribution, the contributors provide the treasurer with a written reattribution of the contribution, which is signed by each contributor and which indicates the amount to be attributed to each contributor if equal attribution is not intended. 11 C.F.R. § 110.1(k).

Commission regulations also provide that a contribution by an unincorporated partnership is attributed to the both the

2340952217

partnership and the partners (1) in direct proportion to his or her share of the partnership profits or (2) by agreement of the partners as long as only the profits of the partners to whom the contribution is attributed are reduced (or losses increased) and these partners' profits are reduced (or losses increased) in proportion to the contribution attributed to each of them. 11 C.F.R. § 110.1(e). A contribution by a partnership shall not exceed the limitation on contributions by individuals, or in the case of a candidate for nomination for President $1,000.

The examination and audit of the Dole For President Committee revealed that the Respondent had made contributions to the Committee that aggregated $5,000 and which were not redesignated to another election, reattributed to a spouse or other person, or refunded within 60 days of their receipt by the Committee. Thus, these contributions exceeded the $1,000 limitation for contributions to candidates for President of the United States.

Therefore, there is reason to believe Obermayer, Rebmann, Maxwell & Hippel has violated 2 U.S.C. § 441a(a)(1)(A).

9304095218

MUR 3638

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

91 DEC -5 PM 5:45

WILEY, REIN & FIELDING

1776 K STREET, N.W.
WASHINGTON, D.C. 20006
(202) 429-7000

FACSIMILE
(202) 429-7049
TELEX 248349 WYRN UR

December 5, 1991

WRITER'S DIRECT DIAL NUMBER

(202) 429-7301

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

Attn: Jeffrey Long

Re: MUR 3309 (General Electric Company PAC and Robert W. Nelson, as Treasurer)

Dear Mr. Noble:

This office has just been retained to represent the General Electric Company PAC and Robert W. Nelson, as Treasurer ("Respondents") in Matter Under Review ("MUR") 3309. An executed Statement of Designation of Counsel form is attached hereto.

A response to the Commission's Factual and Legal Analysis is currently due on December 10, 1991. In order to fully confer with our client and to obtain whatever information and documentation which may prove necessary, and in light of the upcoming holidays, Respondents respectfully request a thirty-day extension of time to and including January 9, 1992, to respond to this matter.

Your favorable consideration of this request will be appreciated.

Sincerely,

Carol A. Laham

Carol A. Laham

Enclosure

cc: Robert W. Nelson

9304095219

STATEMENT OF DESIGNATION OF COUNSEL

MUR 3309

NAME OF COUNSEL: Carol A. Laham

ADDRESS: Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, DC 20006

TELEPHONE: 202/429-7301

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.

11/27/91
Date

Robert W. Nelson
Signature

RESPONDENT'S NAME: Robert W. Nelson, Treasurer for General Electric Company PAC

ADDRESS: 3135 Easton Turnpike
Fairfield, CT 06431

HOME PHONE:

BUSINESS PHONE:

93040952220

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 11, 1991

Carol Laham, Esquire
Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, D.C. 20006

RE: MUR 3309
General Electric Company PAC
and Robert W. Nelson, as
treasurer

Dear Ms. Laham:

This is in response to your letter dated December 5, 1991, which we received on that day, requesting an extension of 30 days to respond to the reason to believe finding in the above-referenced matter. 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 January 9, 1992.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Jeffrey D. Long
Paralegal

2304095222 1

OBC 3635

MANATT, PHELPS, PHILLIPS & KANTOR
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
ATTORNEYS AT LAW
1200 NEW HAMPSHIRE AVENUE, N.W.
SUITE 200
WASHINGTON, D.C. 20036-6889

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

LOS ANGELES
1355 WEST OLYMPIC BOULEVARD
LOS ANGELES, CALIFORNIA 90064-1514
(310) 312-4000

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
91 DEC -5 PM 3:36

December 5, 1991

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

RE: MUR 3309 - Dave Williams, Respondent

Dear Mr. Noble:

This letter requests an extension of time until December 20, 1991 to respond to the above-referenced MUR. Mr. Williams response is presently due on December 10, 1991. The additional amount of time is necessary to prepare a response because of the respondent's travel schedule.

If you have any questions, please let me know.

Sincerely,

Lyn Utrecht

Lyn Utrecht

2304095222

STATEMENT OF DESIGNATION OF COUNSEL

MUR 3309

NAME OF COUNSEL: William C. Oldaker / Lyn Utrecht

ADDRESS: Suite 200
1200 New Hampshire Avenue, N.W.
Washington, D.C. 20036

TELEPHONE: 202-463-4300

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
91 DEC -4 PM 4:42

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

November 27, 1991
Date

Dave H. Williams
Signature

RESPONDENT'S NAME: Dave H. Williams

ADDRESS: 510 Park Avenue
New York, New York 10022

HOME PHONE: 212-969-1177

BUSINESS PHONE: 212-969-1020

2304095222 3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 11, 1991

Lyn Utrecht, Esquire
Manatt, Phelps, Phillips & Kantor
1200 New Hampshire Avenue, N.W.
Suite 200
Washington, D.C. 20036-6889

RE: MUR 3309
Dave Williams

Dear Ms. Utrecht:

This is in response to your letter dated December 5, 1991, which we received on that day, requesting an extension until December 20 to respond to the reason to believe finding in the above-referenced matter. 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 December 20, 1991.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Jeffrey D. Long
Paralegal

2304095222 4

MUR 3634

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

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
91 DEC -5 PM 3:36

December 5, 1991

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

RE: MUR 3309 - Browning-Ferris Industries ("BFI"), Respondent

Dear Mr. Noble:

This letter requests an extension of time until December 30, 1991 to respond to the above-referenced matter. The BFI response is presently due on December 10, 1991. The extension of time is necessary in order to obtain and review the records regarding the underlying matters at issue in the referral.

If you have any questions, please let me know.

Sincerely,

Lyn Utrecht

Lyn Utrecht

2304095222225

96C3621

STATEMENT OF DESIGNATION OF COUNSEL

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
91 DEC -4 PM 4:41

MUR 3309

NAME OF COUNSEL: William C. Oldaker / Lyn Utrecht

ADDRESS: Suite 200
1200 New Hampshire Ave., NW
Washington, D.C. 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.

December 4, 1991
Date

Robert V. Price
Signature

RESPONDENT'S NAME: Browning-Ferris Industries
Robert V. Price, Divisional Vice President

ADDRESS: 757 N. Eldridge
P.O. Box 3151
Houston, Texas 77253

HOME PHONE:

BUSINESS PHONE: 713-870-8024

93040952226

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 10, 1991

Lyn Utrecht, Esquire
Manatt, Phelps, Phillips & Kantor
Suite 200
1200 New Hampshire Ave., NW
Washington, DC 20036

Re: MUR 3309
Browning-Ferris Industries

Dear Ms. Utrecth:

This is in response to your letter dated December 5, 1991, which we received on December 5, 1991, requesting an extension until December 30, 1991 to respond to the Commission's 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 December 30, 1991.

Per your conversation with George Rishel, via telephone, copies of the requested documents have been enclosed for your review.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Lawrence D. Parrish

Lawrence D. Parrish
Staff Attorney

Encl:

2304095222 7

OGC 3604

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

December 5, 1991

BY HAND

Lawrence M. Noble, Esq.
General Counsel
Federal Election Commission
999 E Street, Northwest
Washington, D.C. 20364
Attn: Anne A. Weissborn

Re: MUR 3309

Dear Mr. Noble:

Enclosed please find a completed Designation of Counsel statement for Campaign America and Judith F. Taggart, as treasurer, the respondents in MUR 3309. Please date stamp the extra copy for our files.

Sincerely,

Kenneth A. Gross

Enclosure

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
91 DEC -5 PM 1:30

2300409522228

STATEMENT OF DESIGNATION OF COUNSEL

MUR 3309

NAME OF COUNSEL: Kenneth A. Gross

ADDRESS: Skadden, Arps, Slate, Meagher & Flom
1400 New York Ave., N.W.
Washington, D.C. 20005-2107

TELEPHONE: 202/371-7007

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
91 DEC -5 PM 1:31

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.

Dec. 4, 1991
Date

Jo-Anne L. Coe
Signature

RESPONDENT'S NAME: Campaign America
Judith F. Taggart, as Treasurer
Jo-Anne L. Coe, Assistant Treasurer

ADDRESS: Campaign America
* 511 Capitol Court, N.E. - Suite 100
Washington, D.C. 20002

HOME PHONE: 703/845-1714

BUSINESS PHONE: 202/543-5016

* Note: Effective December 18, address will be:
900 - 2nd Street, N.E. (Suite 114/115)
Washington, D.C. 20002
202/408-5105

93040952229

OGC 3688

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

December 9, 1991

BY HAND

Lawrence M. Noble, Esq.
General Counsel
Federal Election Commission
999 E Street, Northwest
Washington, D.C. 20463
Attn: Anne A. Weissborn, Esq.

Re: MUR 3309

Dear Mr. Noble:

Campaign America, Inc. and Judith Taggart, as treasurer, request pre-probable cause conciliation pursuant to 11 C.F.R. § 111.18(d). We are immediately requesting pre-probable cause conciliation in the hope that this matter will be resolved expeditiously and that the Commission will favorably view our effort to fully cooperate in this matter as we have in the course of the Dole for President audit.

Although we have requested pre-probable cause conciliation, we intend to proffer information to reduce the amount alleged to be in violation of law and mitigate the terms of the final disposition of this matter.

Sincerely,

Kenneth A. Gross

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
91 DEC -9 PM 4:48

2304095222230

MUR 3685

EMENS, HURD, KEGLER & RITTER CO., L.P.A.

ATTORNEYS AND COUNSELORS AT LAW
CAPITOL SQUARE
SUITE 1800
65 EAST STATE STREET
COLUMBUS, OHIO 43215-4294

TELEPHONE: (614) 462-5400
FAX: (614) 464-2634
CABLE: LAW EHKR

JOHN F. ALLEVATO
DONALD A. ANTRIM
JACK A. BJERKE
JOHN P. BRODY
WILLIAM J. BROWN
LARRY K. CARNAHAN
STEPHEN E. CHAPPELEAR
J. RICHARD EMENS
LAWRENCE F. FEHELEY
JOHN L. GRAY
DONALD W. GREGORY
ALLEN L. HANDLAN
EDWARD C. HERTENSTEIN
THOMAS W. HILL
GENE W. HOLLIKER
DWIGHT I. HURD
CHARLES J. KEGLER
R. KEVIN KERNS
RONALD L. MASON
LARRY J. McCLATCHEY
JOHN C. McDONALD
SAMUEL C. RANDAZZO
PAUL D. RITTER, JR.
STEVEN R. RUSSI
S. MARTIJN STEGER
ROGER P. SUGARMAN
KEVIN L. SYKES
JOHN R. THOMAS
JOHN B. TINGLEY
MELVIN D. WEINSTEIN
BEATRICE E. WOLPER
MICHAEL E. ZATEZALO

LORI A. BURRINGTON
ROBERT G. COHEN
ANN L. COLUSSI
JASON M. DOLIN
MICHAEL J. GALEANO
ROGER A. GILCREST
MARGARET L. GRAMANN
JAMES M. GRONER
PAUL R. HESS
ROBIN SMITH HOKE
PAUL L. HOKEMEYER
DAVID M. JOHNSON
DAVID A. KULWICKI
GREGORY D. MAY
SHELLEY A. McBRIDE
J. KEVIN MILLIKEN*
TODD F. PALMER
RICHARD P. ROSENBERRY
O. JUDSON SCHEAF, III
KARL W. SCHEDLER
RICHARD W. SCHUERMANN, JR.
ROBERT G. SCHULER
MICHAEL E. SCOLIERE
THEODORE SCOTT, JR.
AMY M. SHEPHERD
JAMES E. P. SISTO
MARY TEN EYCK TAYLOR
FRANK A. TITUS
TIMOTHY T. TULLIS
DOUGLAS V. WOLFE
NOREEN S. WOLFF

OF COUNSEL
JOHN C. DEAL
PAUL R. LEONARD
ROBERT D. MAROTTA
S. NOEL MELVIN
JOSEPH M. MILLIOUS

* ADMITTED TO PRACTICE ONLY IN NORTH CAROLINA

December 6, 1991

VIA FEDERAL EXPRESS

Federal Election Commission
999 E. St. N.W.
Room 657
Washington, D.C. 20463

Attn: Jeffrey Long

Re: MUR 3309

Dear Jeff:

This is to confirm our legal representation of Mr. U.E. Patrick in the above-captioned matter, as we discussed on December 3, 1991. Enclosed is the Statement of Designation of Counsel required by the Federal Election Commission (the "Commission").

Set forth below is our response to the Commission's Factual and Legal Analysis and request that this matter be dismissed.

On February 17, 1988, Mr. U.E. Patrick donated $2,500.00 by check to the Dole for President Committee. At the time, Mr. Patrick was unaware that this contribution was in excess of the amount allowed by an individual to a presidential candidate's committee with respect to an election.

On February 25, 1988, the Dole Committee apparently deposited Mr. Patrick's check. (See, attached correspondence marked as Exhibit A.) Thereafter, on March 28, 1988, the Dole Committee Campaign Counsel Scott E. Morgan wrote to Mr. Patrick advising that this contribution exceeded the Commission's $1,000.00 contribution limit. (See, Exhibit A.) Mr. Morgan requested instructions from Mr. Patrick regarding the excess portion of the contribution

91 DEC -9 PM 2:25
RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

91 DEC -9 AM 3:13
RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

93040952231

($,1500.00). (See, Exhibit A.) In response, on April 4, 1988, Mr. Patrick signed and mailed back the form Mr. Morgan provided, wherein Mr. Patrick instructed that he be refunded the excess portion of his contribution. (See, Exhibit A.)

On numerous dates subsequent (June 22, July 21 and August 17, 1988), Mr. Patrick's office called the Dole Committee to inquire regarding the status of the refund. (See, Exhibit A.). Finally, on August 29, 1988, the Dole Committee refunded the excess portion to Mr. Patrick. (See, attached correspondence marked as Exhibit B.)

Mr. Patrick inadvertently and unintentionally contributed in excess of the $1,000.00 limit. However, upon notification of the problem he immediately requested a refund of the excess portion of the contribution. By no fault of Mr. Patrick, and despite repeated follow-up by him, the Dole Committee failed to promptly provide the refund. It is clear that the failure to refund within 60 days from the receipt of the contribution lies with the Dole Committee's unresponsive handling of Mr. Patrick's timely request for refund. Mr. Patrick made every effort to comply with 11 CFR §103.3 (b) (3), which permits redesignation, reattribution or refunding of excess portions of contributions to correct an over-the-limit contribution. For these reasons, we do not believe that Mr. Patrick is in violation of 2 U.S.C. 441 (a) (1) (A).

Based upon these additional facts set forth here, we hope that the Commission will reconsider its position regarding this matter and dismiss the instant proceedings against Mr. Patrick. We look forward to hearing back from you regarding this matter at your earliest convenience. Please advise if any further information is required for reconciliation of this situation.

Sincerely,

Rusty

Richard W. Schuermann, Jr.

RWS:dkl
Enclosures
cc: Mr. U.E. Patrick
J. Richard Emens, Esq.
John C. McDonald, Esq.

9304095222232

STATEMENT OF DESIGNATION OF COUNSEL

MUR 3309

NAME OF COUNSEL: Richard W. Schuermann, Jr.

ADDRESS: Emens, Hurd, Kegler & Ritter Co., L.P.A.
65 E. State St., Suite 1800
Columbus, Ohio 43215

TELEPHONE: (614) 462-5400

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.

12-7-91
Date

U E Patrick
Signature

RESPONDENT'S NAME: U.E. Patrick

ADDRESS: Patrick Petroleum Co.
P.O. Box 747
Jackson, MI 49204

HOME PHONE:

BUSINESS PHONE:

9304095222333

DOLE
PRESIDENT

1828 L Street, N.W. • Suite 805
Washington, D.C. 20036
~~(202) 223-9400~~
(TDD) (202) 223-9400

DRAFT
mailed 4/4/88

Called 6-22-88 to check on reimbursement

703-525-0085
Nancy Roda

Called again 7-21-88

Called again 8-17-88

March 28, 1988

Mr. U. E. Patrick
PO Box 747
Jackson, MI 49204

Dear Mr. Patrick:

Thank you very much for your recent contribution to Senator Dole's presidential effort. Unfortunately, you have contributed in excess of the $1,000.00 limit established by the Federal Election Commission. We are required to refund the excessive portion unless the contribution was intended to be a joint contribution. Accordingly, if anyone else has equitable ownership in the account used to make the contribution, then please have them fill out and sign "#1" on the attached form. If this is done, the campaign can attribute the excessive portion to that person and put it to work getting Senator Dole elected.

Of course, if you would prefer a refund simply sign "#2" and the campaign will see to it that you receive a prompt refund.

Whatever you choose, I urge you to fill out the attached form and mail it back to the campaign immediately. We are under a severe time limit set by the Federal Election Commission.

Again, thank you for your support. I apologize for the paperwork, but I assure you that it is very important.

Sincerely,

Scott E. Morgan
Campaign Counsel

Enclosure

Paid for by Dole for President Committee.

93040952234

EXHIBIT "A"

Mr. U. E. Patrick
PO Box 747
Jackson, MI 49204

#1 (To be signed by original contributor and other individual) This is to certify that $1500.00 of the below mentioned contribution(s) should be attributed to me. The account contains my personal funds and our signatures appear below.

Check #	Date Deposited	Amount
378	2/25/88	2500.00

Name _____

Address _____

City/State _____

Signature _____
(please do not print)

Signature _____
(please do not print)

Employer/
Occupation _____

#2 No, the contribution is not joint nor do I want the excess amount transferred to another account. Please refund the excessive portion to me.

Signature _____
(please do not print)

If you have any questions please call 1-800-262-3653, and ask for the Receipts Department.

93040955222335

August 29, 1988

Mr. U.E. Patrick
P.O. Box 747
Jackson, Michigan 49204

Dear Mr. Patrick:

We apologize for the delay in your refund. We had difficulty getting the payment to the correct address.

Senator Dole appreciates all you support and looks forward to receiving your continued interest in his future political efforts.

Sincerely,

Nancy Ann Roda
Dole Committee

9350409522336

EXHIBIT "B"

DOLE FOR PRESIDENT
COMMITTEE, INC.

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 WV0-6 V-S

DATE	DESCRIPTION	AMOUNT
8/29/88	Contribution Refund – replaced ck 2007	$1500.00

Deposit
9-1-88
Comerica

1

93040952237

MUR 3672

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

91 DEC -9 AM 11:49

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 6, 1991

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

91 DEC -9 AM 3:12

Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 3309: Contran

Dear Sir or Madam:

Enclosed is the Designation of Counsel in the above-referenced matter. Please send me copies of the Dole campaign records from which the Commission concluded that there is reason to believe Contran violated 2 U.S.C. § 441b.

Sincerely,

Philip S. Beck

PSB/dec
Encl:

9304095223 8

STATEMENT OF DESIGNATION OF COUNSEL

MUR 3309

NAME OF COUNSEL: Philip S. Beck

ADDRESS: Kirkland & Ellis
200 East Randolph Drive
Chicago, IL 60601

TELEPHONE: 312-861-2388

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.

11/26/91
Date

Harold Simmons
Signature

RESPONDENT'S NAME: Contran Corporation

ADDRESS: 3 Lincoln Centre
5430 LBJ Freeway, Suite 1700
Dallas, Texas 75240

HOME PHONE:

BUSINESS PHONE: 214-233-1700

93040952239

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 10, 1991

Philip S. Beck, Esquire
Kirkland & Ellis
200 East Randolph Drive
Chicago, Illinois 60601

Re: MUR 3309
Contran

Dear Mr. Beck:

This is in response to your letter dated December 6, 1991, which we received on December 9, 1991, requesting copies of the records from which the Commission concluded their finding of reason to believe Contran violated 2 U.S.C. § 441b. Enclosed you will find copies of the requested documents for your review.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Lawrence D. Parrish

Lawrence D. Parrish
Staff Attorney

Encl:

9304095224O

DOLE FOR PRESIDENT COMMITTEE, INC.

Contran

DELUXE - FORM WVO-3 V-2

B1

DATE	DESCRIPTION	AMOUNT
2-3	Air travelBrock, Berkley	$1,662.00

DOLE FOR PRESIDENT COMMITTEE, INC.
1828 L STREET, N.W., SUITE 805
WASHINGTON D.C. 20036

SIGNET BANK
Vienna, VA Virginia

4786

3 February 1988

68-408/560 405

PAY One Thousand Six Hundred Sixty-Two and 00/100 DOLLARS $1,662.00

TO THE ORDER OF

Contran
5430 LBJ Freeway
Suite 1700
Dallas, TX 75230

ENTERED

NOT NEGOTIABLE

⑈00004786⑈ ⑆056004089⑆ 652⑈0024669⑈

930409522241

REQUESTED BY: [illegible]

COUNSEL:

COMPTROLLER:

DIR OF ADMIN:

DPTY CHAIRMAN:

A/P CODE: 483

G/L CODE: 5100-000-300

ENTERED 16171

✓ GIVE CHECK TO

____ MAIL CHECK

OTHER (5)(a)

DOLE FOR PRESIDENT

REQUEST FOR EXPENDITURE

RECEIVED
FEB - 3 1988

PLEASE MAKE CHECK PAYABLE TO: Conman

ADDRESS: 5430 LBJ Freeway
Suite 1700
Dallas, TX 75240

IN THE AMOUNT OF: $1662.00 CHECK NEEDED BY: 2/2 (date)

PURPOSE: Travel. Please see attached.

DATE: 2/2

REQUESTED BY: Scott Morgan

APPROVED BY:

DIVISION DIR:

COUNSEL:

COMPTROLLER:

DIR OF ADMIN:

DPTY CHAIRMAN:

A/P CODE: 483

G/L CODE: 5100-000-300

ENTERED 16171

✓ GIVE CHECK TO SM

____ MAIL CHECK

____ OTHER

93040952242

DOLE
PRESIDENT

1828 L Street, N.W. • Suite 805
Washington, D.C. 20036
(202) 223-9400
(TDD) (202) 223-9400

February 1, 1988

Contran
5430 LBJ Freeway
Suite 1700
Dallas, Texas 75240

Dear Sir or Madame:

Enclosed please find a check to cover air travel expenses incurred by Senator Dole and his staff on January 12, 1988. This payment is made according to Federal Election Commission regulations calculated by first class air fare. The following is a breakdown of expenses:

1/12/88	2 1st class fares (Brock, Berkley)	WDC-Birmingham,AL	$304.00 $608.00
1/12/88	2 1st class fares (Brock, Berkley)	Birmingham,AL-Montgomery,AL	$102.00 $204.00
1/12/88	2 1st class fares (Brock, Berkely)	Montgomery,AL-WDC	$425.00 $850.00
		TOTAL	$1662.00

I hope this calculation meets with your approval. Thank you for your assistance.

Sincerely,

Scott E. Morgan
Chief Counsel

SEM:jws

Enclosure

Paid for by Dole for President Committee

23040952243

DOLE FOR PRESIDENT COMMITTEE, INC.
Contran

DELUXE - FORM WVO-3 V-2

B2

DATE	DESCRIPTION	AMOUNT
3-24	Air travel 7900-000-600	$1,571.00

DOLE FOR PRESIDENT COMMITTEE, INC.
1828 L STREET, N.W., SUITE 805
WASHINGTON, D.C. 20036

SIGNET BANK
Vienna, VA Virginia

5540

24 March 88
19

68-408/560 405

PAY One Thousand Five Hundred Seventy One and 00/100 DOLLARS $ 1,571.00

TO THE ORDER OF
Contran
5430 LBJ Freeway
Suite 1700
Dallas, TX 75240

NOT NEGOTIABLE

"00005540" :056004089: 652"0024669"

930409522444

REQUESTED BY: DOLE COMPANY

COUNSEL:
COMPTROLLER:
DIR OF ADMIN:
DPTY CHAIRMAN:

A/P CODE: 483

G/L CODE: 7900-006-600

ENTERED 21516

✓ GIVE CHECK TO
MAIL CHECK
OTHER

(5)(6)

DOLE FOR PRESIDENT

REQUEST FOR EXPENDITURE

PLEASE MAKE CHECK PAYABLE TO: Conlan

ADDRESS: 5430 LBJ Freeway
Suite 1700
Dallas, Texas 75240

IN THE AMOUNT OF: $1,571.00

CHECK NEEDED BY: 3/24 (date)

PURPOSE: Travel. Office expenses.

DATE: 3/24

REQUESTED BY: Scott Brown

APPROVED BY:

DIVISION DIR:

COUNSEL:

COMPTROLLER:

DIR OF ADMIN:

DPTY CHAIRMAN:

A/P CODE: 483

G/L CODE: 7900-000-600

ENTERED 21516

✓ GIVE CHECK TO KS

___ MAIL CHECK

___ OTHER

930409522245

1828 L Street, N.W. • Suite 805
Washington, D.C. 20036
(202) 223-9400
(TDD) (202) 223-9400

March 14, 1988

Contran
5430 LBJ Freeway
Suite 1700
Dallas, Texas 75240

Dear Sir or Madame:

Enclosed please find a check to cover air travel expenses incurred by Mrs. Dole and staff on March 14, 1988. This payment is made according to Federal Election Commission regulations calculated by first class air fare or standard charter rate. The following is a breakdown of expenses:

3/14	4 1st class fares Chicago,IL-Rockford,IL (Dole, Brock, Kassebaum, Romig)	$77.00	$308.00
3/14	4 1st class fares Rockford,IL-Peoria,IL (Dole, Brock, Kassebaum, Romig)	$162.00	$648.00
3/14	5 1st class fares Peoria,IL-Springfield,IL (Dole, Brock, Kassebaum, Romig, Burkhardt)	$73.00	$365.00
3/14	1 1st class fare DuPage,IL-Palawaukee,IL (Brock)		$250.00*
		TOTAL	$1571.00

*Not served by regular air service. Calculated at a rate of $1,000 an hour.

Sincerely,

Scott E. Morgan
Chief Counsel

SEM:jws

Enclosure

Paid for by Dole for President Committee

93040952246

MITTEE, INC.
ad

DELUXE - FORM WVO-3 V-2

DATE	DESCRIPTION		AMOUNT
4-1	air travel B.Dole	7900-000-600 AP 483	$1,571/00

(33)

DOLE FOR PRESIDENT COMMITTEE, INC.
1828 L STREET, N.W., SUITE 805
WASHINGTON, D.C. 20036

SIGNET BANK
Vienna, VA Virginia

5569

1 April 19 88

68-408/560 405

PAY One Thousand Five Hundred Seventy One and 00/100 DOLLARS $ 1,571.00

TO THE ORDER OF
Contran
5430 LBJ Freeway
Suite 1700
Dallas, TX 75240

NOT NEGOTIABLE

⑈00005569⑈ ⑆056004089⑆ 6 82⑈00 24669⑈

930409522247

REQUESTED BY: Kath Morgan

ENTERED 2113

DIVISION DIR:
COUNSEL:
COMPTROLLER:
DIR OF ADMIN:
DPTY CHAIRMAN:

A/P CODE: 483

G/L CODE: 7 900-000-600

_____ GIVE CHECK TO _____

_____ MAIL CHECK

_____ OTHER _____

(5)(c)

DOLE FOR PRESIDENT

REQUEST FOR EXPENDITURE

PLEASE MAKE CHECK PAYABLE TO: Corhan

ADDRESS: 5420 LBJ Freeway
Suite 1700
DALLAS, TX 75240

IN THE AMOUNT OF: $1571.00 CHECK NEEDED BY: 3/14 (date)

PURPOSE: travel for 3/17

DATE: 3/14

REQUESTED BY: Scott Morgan

ENTERED 2113

APPROVED BY:

DIVISION DIR:

COUNSEL:

COMPTROLLER:

DIR OF ADMIN:

DPTY CHAIRMAN:

A/P CODE: 483

G/L CODE: 7 900-000-600

____ GIVE CHECK TO

____ MAIL CHECK

____ OTHER

93040952248

DOLE
PRESIDENT
1828 L Street, N.W. • Suite 805
Washington, D.C. 20036
(202) 223-9400
(TDD) (202) 223-9400

March 14, 1988

Contran
5430 LBJ Freeway
Suite 1700
Dallas, Texas 75240

Dear Sir or Madame:

Enclosed please find a check to cover air travel expenses incurred by Mrs. Dole and staff on March 14, 1988. This payment is made according to Federal Election Commission regulations calculated by first class air fare or standard charter rate. The following is a breakdown of expenses:

3/14	4 1st class fares Chicago,IL-Rockford,IL (Dole, Brock, Kassebaum, Romig)	$77.00	$308.00
3/14	4 1st class fares Rockford,IL-Peoria,IL (Dole, Brock, Kassebaum, Romig)	$162.00	$648.00
3/14	5 1st class fares Peoria,IL-Springfield,IL (Dole, Brock, Kassebaum, Romig, Burkhardt)	$73.00	$365.00
3/14	1 1st class fare DuPage,IL-Palawaukee,IL (Brock)		$250.00*
		TOTAL	$1571.00

*Not served by regular air service. Calculated at a rate of $1,000 an hour.

Sincerely,

Scott E. Morgan
Chief Counsel

SEM:jws

Enclosure

93040952249

Paid for by Dole for President Committee

MUR 3668

EVERGREEN INTERNATIONAL AVIATION, INC.

3850 Three Mile Lane • McMinnville, OR 97128-9496 USA
Phone (503) 472-9361 • Fax (503) 472-1048
Telex 360841 • SITA HDQ00EZ

30 YEARS OF QUALITY WITHOUT COMPROMISE

December 4, 1991

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

91 DEC -9 AM 11:56

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

91 DEC -9 AM 11

Mr. Jeffrey Long
Federal Election Commission
999 E Street N.W.
Washington, D.C. 20463

RE: MUR 3309
Delford M. Smith

Dear Mr. Long:

The above referenced matter was received in this office December 2, 1991.

In your absence, I spoke with Mr. George Rishel and discussed with him the following:

1. That our records indicate checks in a different amount than the $2100.00 indicated in the "Factual and Legal Analysis" provided by your office.

2. That the checks were: one, to an exploratory committee and the others for tickets to lunches and dinners. At least one check was not signed by Mr. Smith, but by an authorized signator, not an account holder.

3. That while election committees are intimately aware of limitations and while citizen donors usually unaware of any restrictions, the existing burden on committees to refund amounts in excess of the limitations should be pursued before innocent donors are brought to task.

We request an extension of time so that you may provide us with the details of your audit so that we may reconcile the amounts stated in your "Factual and Legal Analysis". Mr. George Rishel informed me that this request would be appropriate under the circumstances of this particular case and indicated that such requests are routinely granted.

It is my understanding that our next step following conciliation of the figures is that I will submit to your office a statement as to why the Federal Election Commission should not proceed further as to Mr. Smith.

93040952250

I further understand that should the Federal Election Commission decide to continue this matter following submission of the aforementioned letter, that we would request pre probable cause conciliation.

Further, that the Federal Election Commission is at this time pursuing the committee which received the funds in question and should they return any amounts in excess of the limits, that this matter will also be closed at that time.

Please verify the correctness of my understanding of the procedures and if they are not exactly correct, please advise me as to the specific procedural requirements. I may be reached at (503) 472-9361, ext. 4111.

Very truly yours,

Dennis V. Griffiths, esq.

DVG/ms

2304095225 1

STATEMENT OF DESIGNATION OF COUNSEL

MUR 3309

NAME OF COUNSEL: Dennis V. Griffiths

ADDRESS: 3850 Three Mile Lane
McMinnville, Oregon 97128

TELEPHONE: (503) 472-9361

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.

12-4-91
Date

DELFORD M. Smith
Signature

RESPONDENT'S NAME: Delford M. Smith

ADDRESS: 3900 North Hembree
McMinnville, Oregon 97128

HOME PHONE: (503) 472-7264

BUSINESS PHONE: (503) 472-0011

73040952252

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 12, 1991

Dennis V. Griffiths
3850 Three Mile Lane
McMinnville, Oregon 97128

RE: MUR 3309
Delford M. Smith

Dear Mr. Griffiths:

This is in response to your letter dated December 4, 1991, which we received December 9, requesting an extension to respond to the reason to believe finding in the above-referenced matter. 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 December 30, 1991.

The checks in question have been sent to Archives and copies are not available. We have enclosed the dates and amounts of the contributions as you have requested.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Jeffrey D. Long
Paralegal

9304095225 3

SCHEDULE A-P ITEMIZED RECEIPTS PAGE 545 OF 651
NAME OF COMMITTEE - DOLE EXPLORATORY COMM LINE NUMBER 11A
PERIOD RUN 07/01/87 THRU 09/30/87

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.

NAME, ADDRESS, CITY, STATE, ZIP	EMPLOYER AND OCCUPATION	RECEIPT DATE	INFO AMOUNT
SMITH, MRS. ANN R. 6416 ENSLEY LANE SHAWNEE MISSION KS 66208	INFORMATION REQUESTED	08/11/87	250.00
(X)PRI ( )GEN ( )OTHER:	AGGREGATE YTD 250.00		
SMITH, MR CHARLES E 1802 KALORAMA SQUARE WASHINGTON DC 20014	CHARLES E SMITH COMPANIES CHAIRMAN OF THE BOARD	08/19/87	1,000.00
(X)PRI ( )GEN ( )OTHER:	AGGREGATE YTD 1,000.00		
SMITH, MR CHARLES L 503 FALL RIVER RD HOUSTON TX 77024	SELF-EMPLOYED	07/28/87	250.00
(X)PRI ( )GEN ( )OTHER:	AGGREGATE YTD 500.00		
SMITH, MR CHARLES L JR 94 BLACK HORSE LANE COHASSET MA 02025	EXECUTIVE	08/26/87	500.00
(X)PRI ( )GEN ( )OTHER:	AGGREGATE YTD 500.00		
SMITH, MR CLARENCE R JR 8270 RAUB AVE PO BOX 3107 YOUNGSTOWN OH 44512	COMPCO	08/04/87	1,000.00
(X)PRI ( )GEN ( )OTHER:	AGGREGATE YTD 1,000.00		
SMITH, MR DAVID C PO BOX 4545 HOUSTON TX 77210	INFORMATION REQUESTED	09/24/87	1,000.00
(X)PRI ( )GEN ( )OTHER:	AGGREGATE YTD 1,000.00		
SMITH, MR DELFORD M 3900 NORTH HEMBREE MC MINNVILLE OR 97123	INFORMATION REQUESTED	08/19/87	1,000.00
(X)PRI ( )GEN ( )OTHER:	AGGREGATE YTD 1,000.00		

SUBTOTAL OF RECEIPTS THIS PAGE RECEIPT AMOUNT 5,000.00

FEC FORM 3-A ITEMIZED DISBURSEMENTS Page 16 of 37
Line Number 28A

NAME OF COMMITTEE
[illegible] for President Committee, Inc.

[illegible] information copied from such Reports and Statements may not be sold or [illegible] 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.

NAME, ADDRESS, CITY, STATE, ZIP	PURPOSE OF DISBURSEMENT	DATE (MONTH, DAY, YEAR)	AMOUNT OF EACH DISBURSEMENT THIS PERIOD
[illegible] A. Smith [illegible] North Meadows McMinnville OR 97218	Contribution Refund DISBURSEMENT FOR: PRIMARY	12/21/87	$100.00
[illegible] Battleplace [illegible] Fairway Loop Eugene OR 97401	Contribution Refund DISBURSEMENT FOR: PRIMARY	12/21/87	$170.00
[illegible] Battleplace [illegible] Fairway Loop Eugene OR 97401	Contribution Refund DISBURSEMENT FOR: PRIMARY	12/31/87	$50.00
[illegible] A. Brannan P.O. Box 711 [illegible] IL 62507	Contribution Refund DISBURSEMENT FOR: PRIMARY	12/21/87	$100.00
[illegible] D. Gibbs [illegible] Santa Blanca West [illegible] Mills CA 92653	Contribution Refund DISBURSEMENT FOR: PRIMARY	12/31/87	[illegible]
[illegible] D. Edwards [illegible] Mariner Ridge Dr. Glendale CA 91207	Contribution Refund DISBURSEMENT FOR: PRIMARY	12/31/87	[illegible]
Mary A. Winkel [illegible] S. Belcher Road, #667 [illegible] FL 34641	Contribution Refund DISBURSEMENT FOR: PRIMARY	12/21/87	$1250.00
SUBTOTAL OF DISBURSEMENTS THIS PAGE (optional)			23,370.00
TOTAL THIS PERIOD (last page this line number only)			

23040955225

SCHEDULE A-P
NAME OF COMMITTEE -
PERIOD FROM 01/01/88 THRU 01/31/88

PAGE 111 OF 158
LINE NUMBER 17A

ANY INFORMATION COPIED FROM [illegible] OR USED BY ANY PERSON OR ORGANIZATION FOR COMMERCIAL PURPOSES OR FOR THE SOLICITATION OF CONTRIBUTIONS BY ANY POLITICAL COMMITTEE TO SOLICIT CONTRIBUTIONS FROM SUCH COMMITTEE.

NAME, ADDRESS, CITY, STATE, ZIP	EMPLOYER AND OCCUPATION	RECEIPT DATE	INFO AMOUNT
SMATHERS, MR JOHN F 2706 N DINWIDDIE ST ARLINGTON VA 22207	INFORMATION REQUESTED	01/06/88	1,000.00
(X)PRI ( )GEN ( )OTHER:	AGGREGATE YTD 1,000.00		
SMITH, MR DELFORD M 3900 NORTH [illegible] MC MINNVILLE OR 97218	INFORMATION REQUESTED	01/22/88	1,000.00
(X)PRI ( )GEN ( )OTHER:	AGGREGATE YTD 1,000.00		
SMITH, MR EMMET PO BOX 216 LONG BEACH WA 98631	[illegible]	01/15/88 01/15/88	200.00 250.00
(X)PRI ( )GEN ( )OTHER:	AGGREGATE YTD 450.00		
SMITH, MR EUGENE L. 228 CORNELL LIBERAL KS 67901	[illegible] & BROOKS	01/12/88	500.00
(X)PRI ( )GEN ( )OTHER:	AGGREGATE YTD 500.00		
SMITH, MS MARTHA B COTTAGE 114 BOX 956 SEA ISLAND GA 31561	INFORMATION REQUESTED	01/27/88	1,000.00
(X)PRI ( )GEN ( )OTHER:	AGGREGATE YTD 1,000.00		
SMOUSE, MS HAZEL 3434 CHARLES ST BAILEY'S CROSS ROADS VA 22641	INFORMATION REQUESTED	01/21/88	210.00
(X)PRI ( )GEN ( )OTHER:	AGGREGATE YTD 210.00		
SNIDER, MR JEROME G 4821 43RD ST NW WASHINGTON DC 20016	INFORMATION REQUESTED	01/06/88	1,000.00
(X)PRI ( )GEN ( )OTHER:	AGGREGATE YTD 1,000.00		

SUBTOTAL OF RECEIPTS THIS PAGE — RECEIPT AMOUNT 5,160.00

[illegible] POSITIVE OR ZERO
[illegible] AND LINE 6(A) $1,000,000.00

23040952256

SCHEDULE B-P ITEMIZED DISBURSEMENTS Page 25 of 36
Line Number 28A

NAME OF COMMITTEE
Dole for President Committee, Inc.

Any information copied from such Reports and 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.

NAME, ADDRESS, CITY, STATE, ZIP	PURPOSE OF DISBURSEMENT	DATE (MONTH, DAY, YEAR)	AMOUNT OF EACH DISBURSEMENT THIS PERIOD
Leola White 1535 S. Manhattan Place #3 Los Angeles CA 90019	Contribution Refund DISBURSEMENT FOR: PRIMARY	04/27/88	$50.00
Delford M. Smith 3900 North Hancock Mcminnville OR 97128	Contribution Refund DISBURSEMENT FOR: PRIMARY	04/28/88	$1000.00
Beatrice Williams 500 El Trigo Dodge City KS 67801	Contribution Refund DISBURSEMENT FOR: PRIMARY	04/28/88	$25.00
George Wright RR. 1, Box 81 Newport PA 17074	Contribution Refund DISBURSEMENT FOR: PRIMARY	04/15/88	$50.00
Helen Pearson 5609 Oakwater Point Drive Orlando FL 32806	Contribution Refund DISBURSEMENT FOR: PRIMARY	04/27/88	$100.00
Edward First 2610 Midland Rd. Harrisburg PA 17104	Contribution Refund DISBURSEMENT FOR: PRIMARY	04/15/88	$500.00
Dixie Rae Melancon 4270 Avenue A Beaumont TX 77705	Contribution Refund DISBURSEMENT FOR: PRIMARY	04/15/88	$153.00
SUBTOTAL OF DISBURSEMENTS THIS PAGE (optional)			$1,878.00
TOTAL THIS PERIOD (last page this line number only)			

93040952257

OBC 3697

STATEMENT OF DESIGNATION OF COUNSEL

MUR 3309

NAME OF COUNSEL: James G. Vetter, Jr.

ADDRESS: Godwin, Carlton & Maxwell
3300 NCNB Plaza
901 Main Street

Dallas, TX 75202

TELEPHONE: 214/939-4817

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

91 DEC 10 PM 2:56

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.

12-4-91
Date

Lonnie Ken Pilgrim
Signature

RESPONDENT'S NAME: Lonnie Ken Pilgrim

ADDRESS: P. O. Box 393

Daingerfield Street

Pittsburg, TX 75686

HOME PHONE: 903/856-6864

BUSINESS PHONE: 903/856-7901

9304095258

OGC3703

U.S. Federation of Small Businesses PAC
208 G Street, N.E.
Washington, D.C. 20002

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
91 DEC 10 PM 4:51

December 10, 1991

John Warren McGarry
Federal Election Commission
Washington, D.C. 20463

Re: MUR 3309

Dear Mr. McGarry:

I was out of town and regret the delay in responding to your November 21 letter.

Small BIZ-PAC gave $1,000 to Dole for President on 11/23/87 which we were qualified to do at that time. Then, anticipating our qualification as a multi-candidate PAC in May of 1988, we wrote a $4,000 check (dated 5/11/88) to Dole for President for a future event. A Small BIZ-PAC member inadvertently gave the check to Dole for President in March of 1988. The Dole for President committee deposited it and the bank cleared it in March even though the check was dated May 1988. Once we found out the check was cashed, we asked for a refund which we received from Dole for President on 4/14/88. Then, for some reason, several months later, Dole for President sent another refund check for $4,000. We refunded Dole for President $3,000 to effectively zero out our account. In effect, we did not give any contribution to Dole for President.

On the FEC's first charge, it appears that, technically, we issued a check when not a multi-candidate committee though we anticipated being one by the date on the check and did not anticipate the check to be delivered and cashed prior to its date. But that check was refunded which negated the transaction. On the second finding, we did not exceed the FEC limits to presidential campaigns since we gave nothing to Dole for President, after the Dole for President refunds.

I regret the handling of this matter was very awkward and confusing and can only plead ignorance and lack of time in tending to details.

I hope this satisfies the Commission's findings.

Very truly yours,

Carla L. Saunders

93040952259

MUR 3693

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

AIKEN, ST. LOUIS & SILJEG, P.S.
ATTORNEYS AT LAW
1215 NORTON BUILDING
801 SECOND AVENUE
SEATTLE, WASHINGTON 98104
FACSIMILE: 206-623-5764
TELEPHONE: 206-624-2650

ROBERT ST. LOUIS
CHARLES E. SILJEG
ARTHUR H. McKEAN
GEORGE S. MARTIN
DOUGLAS W. McQUAID
WALLACE E. SKIDMORE, JR.
STEVEN SOHA

WILLIAM A. OLSON
THOMAS J. LUCAS
JAMES R. WOEPPEL
R. LIND STAPLEY

OF COUNSEL
MARTIN J. DURKAN

RETIRED
WALLACE AIKEN

91 DEC 10 AM 10:56

December 4, 1991

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Jeffrey Long
Federal Election Commission
Washington, D.C. 20463

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
91 DEC 10 PM 2:56

Re: Matthew M. Clapp, Jr.
Your Re: MUR 3309

Dear Mr. Long:

I spoke with Mr. George Rishel today regarding the above matter. Mr. Rishel informed me that you were in Montana and requested that I write to you regarding the purpose of my call.

A letter dated November 21, 1991, was sent to Mr. Clapp. He received it on or about November 25. A response is due on or about December 10. Because I will be out of town, and since Mr. Clapp is attempting to obtain financial information pertinent to this matter, this is to request that we have until January 2, 1992, in which to respond to your inquiry letter.

Please accept this letter as our formal request for an extension. If anything further is required, please contact my office. Although I will be out of the country until December 15, 1991, I will be back on Monday, December 16. I thank you in advance for your assistance and consideration of this matter. I have also attached a Statement of Designation of Counsel appointing this firm and myself, which has been signed by Mr. Clapp.

Very truly yours,

AIKEN, ST. LOUIS & SILJEG, P.S.

Thomas J. Lucas

Thomas J. Lucas

TJL:bjd
Enclosure
cc: Mr. M. Clapp, Jr.
Ms. S. Kelley

clapma/1204long

2304095226O

STATEMENT OF DESIGNATION OF COUNSEL

MUR 3309

NAME OF COUNSEL: Thomas J. Lucas

ADDRESS: Aiken, St. Louis & Siljeg, P.S.
1215 Norton Building
801 Second Avenue
Seattle, WA 98104

TELEPHONE: (206) 624-2650

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.

Dec. 4, 1991
Date

Matthew N. Clapp Jr.
Signature

RESPONDENT'S NAME: Matthew N. Clapp, Jr.

ADDRESS: 720 Olive Way
Seattle, WA 98101

HOME PHONE:

BUSINESS PHONE: 623-6634

2304095226 1

DOC 3699

LEROY C. TOMBS, JR.
8304 Oakland
Kansas City, Kansas 66011
(913) 334-6689

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
91 DEC 10 PM 2:57

December 3, 1991

John Warren McGarry
Chairman
Federal Election Commission
999 E Street
Washington, D.C. 20463

Re: Federal Election Commission vs. Leroy C. Tombs, Jr.
MUR 3309

Dear Chairman McGarry:

This response is provided to your November 21, 1991 correspondence alleging I made an excessive contribution to the Dole for President Committee. I wish to provide the following factual information and state mitigating circumstances which I believe demonstrate no legal action should be taken against me.

First, I would like to state I have a very accurate record keeping system. As such, my records indicate an aggregate amount of only $1,350.00 not $2,350.00 was given to Senator Dole. Additionally, my records indicate the following:

(1) Check no. 284 dated 6/10/87 in the amount of $1,000 payable to Dole for President Exploratory Committee;

(2) Check no. 251 dated 11/27/87 in the amount of $250 payable to Dole for President;

(3) Check no. 252 dated 11/27/87 in the amount of $100 payable to Dole for President.

I am unaware where the additional $1,000 contribution attributed under my name came from; however, there are several possibilities. First, my father's name is Leroy C. Tombs also. His name is usually proceeded by a Sr. and mine by a Jr. It is possible Senator Dole's office improperly attributed the $1,000 to myself rather than to my father. Further, it is possible the

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records provided to the Federal Election Commission were simply overlooked attributing the additional $1,000 to myself rather than my father. The additional $1,000, if attributed to my father, would have had a different address listed on it. I would appreciate the records on this issue being rechecked. I believe if I am guilty of giving an excessive contribution, it was for $1,350 not $2,350.

Second, I believe the $1,350 contribution was both redesignated by Senator Dole to another election fund and a portion of it returned to me. I have enclosed for your review the following documents from Senator Dole's office:

(1) A letter dated December 28, 1987 requesting an attribution, redesignation or a refund. Attached to said correspondence is my response showing $250 should be redesignated to another election fund;

(2) A letter dated February 10, 1988 enclosing a $100 refund along with the check stub;

(3) A letter dated September 15, 1988 indicating an additional refund. No check stub is available on this. However, I believe it was $1,000 that was refunded.

According to my calculations, said amounts which were excessive under the statute were transferred to separate accounts of Senator Dole's. The enclosed correspondence from Senator Dole's office clearly indicates that such action was taken. I feel that Senator Dole's redesignation of the excessive funds to a separate account plus the eventual return of said monies indicates compliance with the statute.

Furthermore, please note that the checks were made payable to separate committees. Drafts nos. 251 and 252 were payable to Dole for President. Draft no. 284 was payable to Dole for President Exploratory Committee.

Thirdly, I would like to set forth the mitigating circumstances in this case. This is the first time I have given to a political candidate in any federal election. As such, I was unaware of the law in this case. I did rely on the Dole for President Committee to inform me of the law. Furthermore, Dole for President Committee correspondence which I have enclosed clearly indicates in all three correspondence that I had complied by the law by Senator Dole's office redesignating portions and giving several refunds. Please review the December 28, 1987,

93040952263

correspondence in the second paragraph which states, "If... the contribution was not joint, I would ask that you sign '#2'. By doing this, the campaign can put the excessive portions toward a 'Legal and Accounting Compliance Fund' to be used in helping Senator Dole in the general election." I executed the same within a timely manner and returned it. According to this document, the contribution put toward the Legal and Accounting Compliance Fund would have made this amount inapplicable to my contribution. It appears that $250 was transferred within 60 days from November 27, 1987, the date of my $250 contribution.

The February 10, 1988 correspondence indicates a refund of $100. The Dole for President Committee indicates it is refunding $100 which is over the $1,000 limitation. The letter further goes on to state that Senator Dole would accept any contribution to the Dole for President Compliance Fund in helping Senator Dole in the general election. Again, it appears that said refund could have possibly been made within the 60 days. As previously stated, draft no. 252 was dated November 27, 1987. Based upon the mailing system, it is possible that said amount was refunded to myself within 60 days.

Furthermore, the September 15, 1988 correspondence indicates a refund was enclosed. The letter clearly indicates that my total contribution was in compliance with the $1,000 limit set by the Federal Election Commission. It appears from the date of this letter that the $250 was put in the Dole for President Legal and Accounting Compliance Account for possibly the general election. Upon the loss of the primary election by Senator Dole, the committee then proceeded to refund an amount. I believe $1,000 was refunded. It appears that this refunded amount again would bring my contributions within the legal limitations set.

Lastly, at this time I do not wish to be represented by counsel. I may at a later date choose to have an attorney enter his/her appearance.

In the meantime, I request you review the factual and mitigating circumstances set forth in my case which demonstrate no legal action should be taken. Should your office choose to pursue this matter, I am requesting to participate in pre-probable cause conciliation.

2304095226 4

I look forward to your response. If you have any questions or comments regarding the foregoing, please feel free to contact me.

Very truly yours,

Leroy C. Tombs, Jr.

LCT/dd
Enclosures

cc: Jeffrey Long
Federal Election Commission

93040952265

DOLE
PRESIDENT

1828 L Street, N.W. • Suite 805
Washington, D.C. 20036
(202) 223-9400
(TDD) (202) 223-9400

December 28, 1987

Mr. Leroy C. Tombs, Jr.
633 South 134th
Bonner Springs, KS 66012

Dear Mr. Tombs:

Thank you very much for your recent contribution to Senator Dole's presidential effort. Unfortunately, you have contributed in excess of the $1,000.00 limit established by the Federal Election Commission. We are required to refund the excessive portion unless the contribution was intended to be a joint contribution. Accordingly, if anyone else has equitable ownership in the account used to make the contribution, then please have them fill out and sign "#1" on the attached form. If this is done, the campaign can attribute the excessive portion to that person and put it to work getting Senator Dole elected.

If, however, the contribution was not joint, I would ask that you sign "#2." By doing this, the campaign can put the excessive portion toward a "Legal and Accounting Compliance Fund" to be used in helping Senator Dole in the general election.

Of course, if you would prefer a refund simply sign "#3" and the campaign will see to it that you receive a prompt refund.

Whatever you choose, I urge you to fill out the attached form and mail it back to the campaign immediately. We are under a severe time limit set by the Federal Election Commission.

Again, thank you for your support. I apologize for the paperwork, but I assure you that it is very important.

Sincerely,

Scott E. Morgan
Campaign Counsel

Enclosure

Paid for by Dole for President Committee

93040952266

1828 L Street, N.W. • Suite 805
Washington, D.C. 20036
(202) 223-9400
(TDD) (202) 223-9400

December 17, 1987

Mr. Leroy C. Tombs
Bonner Springs, KS 66012

Dear Mr. Leroy C. Tombs:

Thank you for your recent contribution. However, Federal law requires that we obtain additional information before we can submit for matching funds a contribution made by money order, cashier's check, traveler's check or other similar negotiable instrument. If the statement below is accurate, will you please sign and return it to the Committee at your earliest convenience?

Thank you for your help.

Sincerely,

Nancy L. Rode
Dole for President
Exploratory Committee

I made a contribution of $1,000.00, by money order, cashier's check, traveler's check or other similar negotiable instrument deposited November 17, 1987. This is to verify that the contribution was made with my personal funds.

Name Leroy C Tombs Jr.
Address 633 So. 134 St - P.O. Box 437
City Bonner Springs
State Kansas Zip 66012
Your signature Leroy C Tombs Jr.
(please do not print)

ID: U66012 TMBS 000 L 1 Bseq: 007727-0007 Ltr: 05

Paid for by Dole for President Committee

23004095522067

Mr. Leroy C. Tombs, Jr.
633 South 134th
Bonner Springs, KS 66012

#1 (To be signed by original contributor and other individual) This is to certify that $250.00 of the below mentioned contribution(s) should be attributed to me. The account contains my personal funds and our signatures appear below.

Check #	Date Deposited	Amount
251	11/30/87	250.00

Name _____

Address _____

City/State _____

Signature _____
(please do not print)

Signature _____
(please do not print)

Employer/
Occupation _____

#2 (To be signed if original contribution was not joint) This is to certify that $250.00 of contributions I have made to the Dole for President Committee may be transferred to the "Legal and Accounting Compliance Fund." This contribution represents my personal funds. I understand that I could have received a refund for this amount instead.

Signature _____
(please do not print)

#3 No, the contribution is not joint nor do I want the excess amount transferred to another account. Please refund the excessive portion to me.

Signature _____
(please do not print)

If you have any questions please call 1-800-262-3653, and ask for the Receipts Department.

93040952268

DOLE
PRESIDENT

1828 L Street, N.W. • Suite 805
Washington, D.C. 20036
(202) 223-9400
(TDD) (202) 223-9400

February 10, 1988

Mr. Leroy C. Tombs, Jr.
633 South 134th Street
Bonner Springs, KS 66012

Dear Mr. Tombs:

Your most recent contribution to Dole for President was received and deposited.

However, because Federal Election Commission regulations limit the amount an individual may contribute to a political candidate to $1,000.00, it is necessary for us to refund to you the $100.00 that is over the limit.

Senator Dole would, of course, gladly accept any contributions to the "Dole for President Compliance Fund," to be used in helping Senator Dole in the general election. You can be sure that Senator Dole very much appreciates your contribution and hopes that you will continue your support of his presidential effort.

Yours truly,

Dole for President
Committee

Enclosure

930409522069

Paid for by Dole for President Committee

9304095222/0

CHECK NO. 016150

VENDOR: L TOMBS

OUR REF NO	YOUR INV NO	INVOICE DATE	INVOICE AMOUNT	AMOUNT PAID	DISCOUNT TAKEN	NET CHECK AMOUNT
14220	REFUND	01/30/88	100.00	100.00	.00	100.00
					CHECK TOTAL	100.00

DOLE
PRESIDENT

1828 L Street, N.W. • Suite 805
Washington, D.C. 20036
(202) 223-9400
(TDD) (202) 223-9400

September 15, 1988

Dear Contributor:

Per your request, we are refunding your contribution which was deposited into the Dole for President Legal & Compliance Account.

Since you have indicated that you do not want to transfer the money to the Post Primary Obligation Fund, this refund should bring your total contribution in compliance with the $1,000 limit set by the Federal Election Commission.

The Senator appreciates your support and looks foward to your continued interest in his political endeavors.

Sincerely,

Nancy A. Roda
Dole for President Inc.

Enclosure

Paid for by Dole for President Committee

93040952271

MUR 3700

THE HARTFORD
The Insurance People of ITT

Henry Katz
Vice President

Hartford Plaza
Hartford, CT 06115
Telephone (203) 547-5000

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
91 DEC 10 PM 2:57

December 2, 1991

Hon. John Warren McGarry, Chairman
Federal Election Commission
Washington, D.C. 20463

Re: MUR 3309
Hartford Insurance Group
Political Action Committee and
Robert J. Mageau, as treasurer

Attention: Mr. Jeffrey Long

Dear Mr. Long:

This will refer to Mr. McGarry's November 21, 1991 letter bearing the above caption. We are pleased to be able to respond and we believe that, based upon the following information, the Commission will agree that there has been no violation of the Federal Campaign Act of 1971 and that this inquiry can be closed.

Mr. McGarry's letter indicates that the information concerning our contributions to the Dole for President Committee came from an audit of the Dole for President Committee. That letter goes on to correctly recite two contributions which were made by The Hartford Insurance Group Political Action Committee. These contributions were $2,000.00 by check dated September 3, 1987 and, inadvertently, another $5,000.00 by check dated February 22, 1988. However, the audit of the Dole for President Committee should also have indicated that this inadvertent error was soon discovered and, on May 30, 1988, the Dole for President Committee returned to The Hartford Insurance Group Political Action Committee its check for $2,000.00 representing the excess contribution.

Attached are copies of the Summary Page, Detailed Summary Page and Schedule A (line number 16) from the FEC Form 3X filed by The Hartford Insurance Group Political Action Committee on October 14 1988, covering the period July 1, 1988 through September 30, 1988. You will note that item 16 in column A of the Detailed Summary Page reflects a $2,000.00 refund of a contribution made to a federal candidate. Schedule A for line number 16 identifies that refund as a $2,000.00 refund from the Dole for President Committee.

9304095222 72

I am also enclosing a copy of the invoice which accompanied check No. 030079 which we received from the Dole for President Committee, dated May 30, 1988. Due to internal confusion as to how to account for this refund we erred in not reporting it until the October 14, 1988 FEC Form 3X report. However, we believe that as of the return of this excess contribution, this inadvertent violation had been cured, and that The Hartford Insurance Group Political Action Committee was in compliance with the Federal Election Campaign Act of 1971.

Additionally, we have instituted new procedures to monitor all contributions to federal candidates during an election cycle to minimize the likelihood that an inadvertent excess contribution will be made in the future.

If the foregoing explanation of this matter is acceptable, I trust you will advise us that your file is being closed. Should you have any additional questions, we will be pleased to respond to them.

Very truly yours,

HK:amf

enc.

1894Q/40

93040952273

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee

(Summary Page)

File - H16 PAC

USE FEC MAILING LABEL OR TYPE OR PRINT

1. NAME OF COMMITTEE (in full)
Hartford Insurance Group political Action Committee (H16-PAC)

ADDRESS (number and street) ☐ Check if different than previously reported
Waterside Crossing, Bldg 1 Floor 2
Accounting Control Division

CITY, STATE and ZIP CODE
Windsor, CT. 06095

2. FEC IDENTIFICATION NUMBER
C 00168864

3. ☐ This committee qualified as a multicandidate committee DURING THIS Reporting Period on 1/31/84 (date).

4. TYPE OF REPORT

(a) ☐ 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)
☐ Termination Report

Monthly Report Due On:
☐ February 20 ☐ June 20 ☐ October 20
☐ March 20 ☐ July 20 ☐ November 20
☐ April 20 ☐ August 20 ☐ December 20
☐ May 20 ☐ September 20 ☐ January 31

☐ 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 _____

(b) Is this Report an Amendment? ☐ YES ☑ NO

23U40955227 4

SUMMARY

		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5.	Covering Period 7/1/88 through 9/30/88		
6.	(a) Cash on Hand January 1, 19 88		$ 63,551 05
	(b) Cash on Hand at Beginning of Reporting Period	$ 85,949 85	
	(c) Total Receipts (from Line 18)	$ 17,399 64	$ 62,970 41
	(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	$ 103,349 49	$ 126,721 49
7.	Total Disbursements (from Line 28)	$ 34,710 00	$ 55,182 00
8.	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	$ 68,539 49	$ 68539 49
9.	Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	$ 0	
10.	Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	$ 0	

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.

Type or Print Name of Treasurer
Richard K. Zlotnick, Assistant Treasurer

Signature of Treasurer (Asst)
Richard K Zlotnick

Date
10/14/88

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

10/14/88

FEC FORM 3X

DETAILED SUMMARY PAGE
of Receipts and Disbursements
(Page 2, FEC FORM 3X)

ID # C00168864

Name of Committee (in full): Hartford Teachers Coop (HTC PAC)

Report Covering Period From: 7/1/88 To: 9/30/88

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			
(i) Itemized (use Schedule A)	943 72	6,276 54	11(a)
(ii) Unitemized	13,386 59	51,633 03	11(a)
(iii) Total of contributions from individuals	14,330 31	57,909 97	11(a)
(b) Political Party Committees			11(b)
(c) Other Political Committees (such as PACs)			11(c)
(d) TOTAL CONTRIBUTIONS (add 11(a)(iii), (b), and (c))	14,330 31	57,909 97	11(c)
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES	-	-	12
13. ALL LOANS RECEIVED	-	-	13
14. LOAN REPAYMENTS RECEIVED	-	-	14
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	-	-	15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	2000 00	2000 00	16
17. OTHER RECEIPTS (Dividends, Interest, etc.)	1369 43	2961 44	17
18. TOTAL RECEIPTS (add 11(d), 12, 13, 14, 15, 16 and 17)	17699 74	62,870 41	18
II. DISBURSEMENTS			
19. OPERATING EXPENDITURES	-	-	19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES	15,000 00	15,000 00	20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	14435 00	42,195 00	21
22. INDEPENDENT EXPENDITURES (use Schedule E)	-	-	22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 441a(d)) (use Schedule F)	-	-	23
24. LOAN REPAYMENTS MADE	-	-	24
25. LOANS MADE	-	-	25
26. REFUNDS OF CONTRIBUTIONS TO:			
(a) Individuals/Persons Other Than Political Committees			26(a)
(b) Political Party Committees			26(b)
(c) Other Political Committees (such as PACs)			26(c)
(d) TOTAL CONTRIBUTION REFUNDS (add 26(a), (b), and (c))	-	-	26(d)
27. OTHER DISBURSEMENTS. Federal income tax	275 00	997 00	27
28. TOTAL DISBURSEMENTS (add 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	34710 00	58,192 00	28
III. NET CONTRIBUTIONS/OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than loans)(from Line 11(d))	14,330 31	57,909 97	29
30. TOTAL CONTRIBUTION REFUNDS (from Line 26(d))	-	-	30
31. NET CONTRIBUTIONS (other than loans)(subtract Line 30 from 29)	14,330 31	57,909 97	31
32. TOTAL OPERATING EXPENDITURES (from Line 19)	-	-	32
33. OFFSETS TO OPERATING EXPENDITURES (from Line 15)	-	-	33
34. NET OPERATING EXPENDITURES (subtract Line 33 from 32)	-	-	34

23040952275

SCHEDULE A — ITEMIZED RECEIPTS

Use separate schedule(s) for each category of the Detailed Summary Page

PAGE 1 OF 1

FOR LINE NUMBER 16

Any information copied from such Reports and 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.

NAME OF COMMITTEE (in Full)

The Hartford Insurance Group political Action Committee (HIG PAC)

A. Full Name, Mailing Address and ZIP Code Dole for President Committee 1825 L. Street NW. Suite 505 Washington, DC. 20036 Receipt For: ☐ Primary ☐ General ☑ Other (specify): Refund of contribution to primary	Name of Employer: N/A Occupation: N/A Aggregate Year-to-Date > $ N/A	Date (month, day, year): 9/24/88	Amount of Each Receipt this Period: $2,000.00
B. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > $	Date (month, day, year)	Amount of Each Receipt this Period
C. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > $	Date (month, day, year)	Amount of Each Receipt this Period
D. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > $	Date (month, day, year)	Amount of Each Receipt this Period
E. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > $	Date (month, day, year)	Amount of Each Receipt this Period
F. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > $	Date (month, day, year)	Amount of Each Receipt this Period
G. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > $	Date (month, day, year)	Amount of Each Receipt this Period

SUBTOTAL of Receipts This Page (optional)	$2,000.00
TOTAL This Period (last page this line number only)	$2,000.00

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030079

R PRESIDENT COMMITTEE, INC.

OD NUM	YOUR INVOICE NUMBER	INVOICE DATE	INVOICE AMOUNT	AMOUNT PAID	DISCOUNT TAKEN	NET CHECK AMOUNT
000 03	REFUND	05/30/88	2000.00	2000.00	0.00	2000.00

93040952217

86C3722

The RBA Group

ENGINEERS • ARCHITECTS • PLANNERS

William Gatto, P.E., P.P. • Warren Bendixen, R.A., P.P. • John Murphy, R.A.

December 4, 1991

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
91 DEC 11 PM 3:33

Lawrence D. Parrish, Esq.
Federal Election Commission
Washington, DC 20463

Re: MUR 3309
The RBA Group

Dear Mr. Parrish:

This is to confirm our recent telephone conversation regarding the above. At your suggestion, I contacted your General Information Office for the mailing address of the Dole for President Committee. I am enclosing a copy of our request to the Committee to provide documents that will assist in presenting the facts of this matter.

In order to avail the Committee an opportunity to review their files, I am requesting at least twenty additional days within which to respond to the FEC. Furthermore, pursuant to the Freedom of Information Act, I am requesting from you those documents identified during your audit of the Dole Committee records and any other materials in your possession that are relevant to this matter. In addition, I am enclosing our "Statement of Designation of Counsel." Lastly, in view of our belief that the allegations do not involve a knowing and willful violation of the statute, The RBA Group is interested in pursuing pre probable cause conciliation. Thank you.

Very truly yours,

John J. Maiorana

John J. Maiorana
Counsel

JJM:sjp (FEC.LET)

Enclosure

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM
91 DEC 11 PM 2:21

9304095278

1 EVERGREEN PLACE, P.O. BOX 1927, MORRISTOWN, NJ 07962-1927 (201) 898-0300 • FAX (201) 898-9472
Morristown, NJ • New York, NY • Columbia, MD • Atlanta, GA • Baton Rouge, LA • Doylestown, PA • Charlotte, NC

The RBA Group
ENGINEERS • ARCHITECTS • PLANNERS
William Garris, P.E., P.P. • Warren Bendixen, R.A., P.P. • [illegible]

December 4, 1991

Dole for President Committee
P.O.Box 859
McLean, VA 22101

Re: NJ Tribute to Senator Bob Dole
December 8, 1987

Dear Sir or Madam:

In response to a New Jersey Dole for President Committee invitation, The RBA Group purchased two tickets to the above function. On November 21, 1991, the Federal Election Commission advised RBA of reason to believe that the purchase of these tickets violated 2 U.S.C. 441b insomuch as the payment was made by corporate check.

The principals of RBA believe that correspondence was exchanged between your Committee and RBA shortly after these tickets were purchased, and that said correspondence is relevant to the FEC charges. In fact, we believe there may have been a refund issued to RBA in order to avoid any improprieties in this regard.

We are searching our records and have yet to locate the above referenced documents. It is respectfully requested that you review your files and provide us with copies of pertinent correspondence and evidence of any refund from the Committee.

In addition, it is requested that you provide this information to us as quickly as possible as a response to the FEC is due on December 30, 1991, contingent upon the FEC granting a twenty day extension of time. Thank you for your cooperation.

Very truly yours,

John J. Maiorana

John J. Maiorana
Counsel

JJM:sjp (DOLE.LET)

cc: Lawrence D. Parrish, Esq.

9304095279

1 EVERGREEN PLACE, P.O. BOX 1927, MORRISTOWN, NJ 07962-1927 (201) 898-0300 • FAX (201) 898-9472
Morristown, NJ • New York, NY • Columbia, MD • Atlanta, GA • Baton Rouge, LA • Doylestown, PA • Charlotte, NC

STATEMENT OF DESIGNATION OF COUNSEL

MUR 3309

NAME OF COUNSEL: John J. Maiorana

ADDRESS: c/o The RBA Group
1 Evergreen Place-P.O.Box 1927
Morristown, NJ 07962-1927

TELEPHONE: (201) 898-0300
FAX.NO. (201) 898-9472

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.

12/4/91
Date

William Raiford
Signature

RESPONDENT'S NAME: The RBA Group

ADDRESS: 1 Evergreen Place- P.O.Box 1927
Morristown, NJ 07962-1927

HOME PHONE:

BUSINESS PHONE: (201) 898-0300

93040952280

06C3726

December 2, 1991

Mr. John Warren McGarry
Chairman
Federal Election Commission
Washington D.C. 20463

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT
91 DEC 11 PM 3:34

RE MUR 3309

Dear Mr. McGarry:

Pursuant to your letter of November 21, 1991 I regret that I inadvertently violated 2 U.S.C. # 441 a(a)(1)(A). I would be very interested in pursuing pre-probable cause conciliation.

Sincerely,

Willis Hesselroth
4433 Sea Forest Drive
Kiawah Island S.C. 29455

2304095522281

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 12, 1991

Scott E. Morgan, Esquire
1618 Inverness Drive
Lawrence, Kansas 66047

RE: MUR 3309
Dole for President Committee
James L. Hagen, as treasurer

Dear Mr. Morgan:

Pursuant to your request, enclosed are copies of the documents presented to your clients at the audit exit conference which support the audit determination that the Dole for President Committee ("the Committee") accepted excessive contributions from individuals.

You have also expressed orally an interest in pursuing a conciliation agreement which would encompass both the Committee's violations and any individual contributors who have been named as respondents in this matter. If you want to pursue this approach, you will need to request in writing the names of the individual respondents. This Office would submit such a request to the Commission with a favorable recommendation.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Anne A. Weissenborn

Anne A. Weissenborn
Senior Attorney

Enclosure
Audit documents

2304095222882

86-C3751

LAW OFFICES

JENNER & BLOCK

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

601 THIRTEENTH STREET, N. W.
TWELFTH FLOOR
WASHINGTON, D. C. 20005

(202) 639-6000
(202) 639-6066 FAX

DIRECT DIAL NUMBER:

JONATHAN B. SALLET

CHICAGO OFFICE
ONE IBM PLAZA
CHICAGO, IL 60611
(312) 222-9350
(312) 527-0484 FAX

MIAMI OFFICE
ONE BISCAYNE TOWER
MIAMI, FL 33131
(305) 530-3535
(305) 530-0006 FAX

LAKE FOREST OFFICE
ONE WESTMINSTER PLACE
LAKE FOREST, IL 60045
(708) 295-9200
(708) 295-7810 FAX

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

91 DEC 13 PM 12:17

December 12, 1991

John Warren McGarry
Chairman
Federal Election Commission
Washington D.C. 20463

Re: MUR 3309, Long Lines Limited

Dear Mr. Chairman:

I am appearing in this matter as counsel for the respondent, Long Lines Limited. Enclosed is a completed form designating me as counsel for this matter.

Your letter informing Long Lines Limited of the pending matter was received on December 2, 1991. Accordingly, we will be responding on or before December 17, 1991, 15 days after receipt of the letter.

Sincerely,

Jonathan B. Sallet

Enclosure
Statement of Designation
of Counsel

cc: Lawrence D. Parrish, Esq.

2304095228 3

STATEMENT OF DESIGNATION OF COUNSEL

MUR 3309

NAME OF COUNSEL: Jonathan B. Sallet

ADDRESS: Jenner & Block
601 Thirteenth Street, N.W., 1200S
Washington, D.C. 20005

TELEPHONE: 202-639-6030

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.

12/10/91
Date

CEO
Signature
John Wankel
President & CEO

RESPONDENT'S NAME: Long Lines Limited

ADDRESS: 504 4th Street
Sgt. Bluffe, Iowa 51054

HOME PHONE:

BUSINESS PHONE: 712-943-5566

9304095222884

becon CONSTRUCTION COMPANY, INC.
P.O. BOX 53392 - HOUSTON, TEXAS 77052 - (713) 235-1600

MUR 3309

December 13, 1991

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
91 DEC 16 PM 3:13

Federal Election Commission
Washington, D. C. 20463

Attention: Lawrence D. Parrish, Esq.

Re: MUR 3309

Dear Mr. Parrish:

This letter is to confirm the message I left on your voice mail yesterday, December 12, 1991. I called to confirm the receipt of Mr. McGarry's November 21, 1991 letter to J. M. Komes, as President of Becon, informing Mr. Komes of a possible violation of the Federal Election Campaign Act by Becon Construction Company, Inc. The delay in receipt is due to the fact that Mr. Komes is no longer employed by Becon, and that the letter was addressed to an office in Charlotte, North Carolina which is no longer a Becon office. Mr. George Risher of the Commission re-addressed the letter to Mr. Komes in Houston on December 4, 1991. The letter was finally received by the current President of Becon yesterday, December 12, 1991.

We are reviewing the situation in order to respond within the required 15 day time period, which we assume will expire on December 27, 1991.

If you have any questions regarding this letter, please do not hesitate to call me at (713) 235-1529.

Sincerely,

Grayson M. Hippard

Grayson M. Hippard

2304095228 5

MUR 3821

LAW OFFICES

JENNER & BLOCK

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

601 THIRTEENTH STREET, N. W.
TWELFTH FLOOR
WASHINGTON, D. C. 20005

(202) 639-6000
(202) 639-6066 FAX

DIRECT DIAL NUMBER:

JONATHAN B. SALLET

CHICAGO OFFICE
ONE IBM PLAZA
CHICAGO, IL 60611
(312) 222-9350
(312) 527-0484 FAX

MIAMI OFFICE
ONE BISCAYNE TOWER
MIAMI, FL 33131
(305) 530-3535
(305) 530-0008 FAX

LAKE FOREST OFFICE
ONE WESTMINSTER PLACE
LAKE FOREST, IL 60045
(708) 295-9200
(708) 295-7810 FAX

December 17, 1991

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

91 DEC 17 AM 11:09

Lawrence D. Parrish, Esq.
Office of the General Counsel
Federal Election Commission
Washington, D.C. 20463

Re: MUR 3309

Dear Mr. Parrish:

On behalf of the respondent Long Lines Limited, I request an extension of time until the close of business January 3, 1992, in which to respond to Chairman McGarry's letter of November 21, 1991.

As you know, our original due date for a response is today, December 17th. It was our original intention to adhere to this date but, for two reasons, we respectfully request a twenty-day extension.

First, we would like to complete a thorough factual investigation before we respond. In that manner, we hope to expedite this process. Unfortunately, that factual review is not yet complete.

Second, my own schedule over the next few weeks is fairly difficult. I am getting married this coming Saturday and will not return to Washington until December 30th. Also, given the advent of the holiday season, it would be difficult for me to have an another experienced attorney handle this matter in my absence and it might be difficult to have the necessary communications with my client.

2304095222886

I apologize for filing this request less than five days before the response date but, as detailed herein, it was not until today that the need for an extension became obvious.

I appreciate your attention to this matter.

Sincerely,

Jonathan B. Sallet

2304095222887

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 19, 1991

Courier Pick-up

Jonathan Sallet
Jenner & Block
601 Thirteenth Street, N.W.
Washington, DC 20005

Re: MUR 3309
Long Lines Limited

Dear Mr. Sallet:

This is in response to your letter dated December 17, 1991, which we received on December 17, 1991, requesting an extension until January 3, 1992 to respond to the Commission's 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 January 3, 1992.

Per our conversation, via telephone, I have enclosed copies of the requested documents for your review.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Lawrence D. Parrish
Staff Attorney

Encl:

9304095228 8

086-3825

P&D REALTY
MORRIS CANAL PLAZA
1070 US HWY. 46
LEDGEWOOD, NEW JERSEY 07852

December 12, 1991

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
91 DEC 17 PM 2:04

CERTIFIED MAIL - RETURN RECEIPT REQUESTED (P 377 172 899)

Mr. John Warren McGarry
Federal Election Commission
Washington, DC 20463

Dear Mr. McGarry:

Subject: MUR 3309 - P&D Realty

We are in receipt of your letter dated November 21, received on November 27. **Be advised that P&D Realty is a Partnership, not a Corporation.**

Enclosed is a copy of the Partnership Agreement of P&D Realty. Also enclosed is the first page of our partnership return for the past three years.

Therefore, based upon your letter of November 21, P&D Realty is not in violation of the laws as quoted. We would appreciate a letter retracting this issue.

Sincerely,

David P. Romano
Administrator

DPR:lar
Enclosure

DPR:D146/007

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1. NAME AND BUSINESS. The parties do hereby form a partnership under the name of P&D Realty Associates for the purpose of holding and leasing certain real estate, commercial establishments and other items of similar nature. The principal place of business of said partnership shall be 28 Roxbury Mall, Rt. 10, Succasunna, New Jersey 07876.

2. TERM. The partnership shall begin upon the execution of this Agreement, and shall continue until terminated as provided herein.

3. CAPITAL. The capital of the partnership shall be contributed in cash or other property by the partners from time to time, the initial contribution being set forth on schedule as attached to this Agreement. Subsequent contributions may be made from time to time as may be unanimously agreed by the partners. A separate capital account shall be maintained for each partner.

4. EXECUTIVE SECRETARY. Once each year an executive secretary of the partnership shall be elected by the unanimous vote of partners. The executive secretary shall have physical possession of the books and records of the partnership, shall give such notices to the partners as may, from time to time, be required or deemed advisable, and shall perform the necessary ministerial functions of the partnership.

5. MEETING. Regular meetings of the partnership shall be held at least once each year, or more often as determined by the partnership. Notice of the time and place of each regular meeting shall be given in writing by the executive secretary to each partner at least once a week before such meeting. Special meetings may be called by the executive secretary or any two partners on such notice as he may determine.

6. CAPITAL ACCOUNTS. The individual capital accounts maintained for

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each partner shall consist of his original capital contribution: (a) increased by his additional contributions to capital and by his share of partnership profits transferred to capital; (b) decreased by his share of partnership losses and by distributions to him in reduction of his capital; and (c) increased or decreased (as the case may be) based on any valuation of the net value of partnership assets. All of the above shall be accomplished as of the end of the fiscal or calendar year of the

partnership or at such other times as shall be unanimously agreed by all partners.

7. VALUATION AND VALUATION DATE. The net value of partnership assets shall be determined only on and as of the date of the admission of new partners into the partnership, and withdrawal of existing partners from the partnership (whether voluntary or involuntary, by death or otherwise). Valuation of partnership assets for purposes of determining the capital accounts of the individual partners, may be made at such other times, upon the unanimous vote of all partners. Valuation shall be determined by a team of three reputable appraisers bearing the MAI designation, who by a majority decision, shall fix the value of each asset to be appraised. One appraiser shall be designated by a vote of partners who own a majority in amount of the total capital accounts of all the partners. One appraiser shall be designated by the withdrawing partner, or his representative. One appraiser shall be designated jointly, by the partnership and by the withdrawing partner, or his representative. Notwithstanding the foregoing, valuation of the assets of the partnership upon the admission of a new partner into said partnership, shall be made by a reputable appraiser designated unanimously by all partners.

8. PROFIT AND LOSS. The net profit or net losses of the partnership shall be allocated or charged to the partners, at least once each year, or more often as determined by the partnership, in the ratios of their respective capital accounts on that date. A separate income account shall be maintained by each partner. Partnership profits and losses shall be charged or credited to the separate income account of each

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partner. If a partner has no credit balance in his income account, losses shall be charged to his capital account. Each partner may, from time to time, withdraw the credit balance in his income account.

9. SALARIES AND DRAWINGS. No partner shall receive any salary for non-professional services rendered to the partnership, unless by unaimous vote of the partners.

10. INTEREST. No interest shall be paid on the initial contributions to the capital of the partnership or on any subsequent contributions of capital.

11. MANAGEMENT. Each partner shall have a voice in the management of the partnership business. Except as otherwise provided in this Agreement, all decisions relating to the partnership business must be by unanimous vote of the partners.

12. CUSTODY OF PARTNERSHIP ASSETS. All partnership assets, including but not limited to, personalty, general intangibles, choses in action, and all interests appertaining thereto, owned or held in the name of the partnership shall be in the primary custody of the executive secretary, who shall hold such assets for the benefit of the partners.

13. RESTRICTION ON PARTNERS. No partners, without the prior written consent of all other partners, shall:

(a) Sell, assign, mortgage, grant a security interest in, or pledge his interest in the partnership;

(b) Borrow or lend money on behalf of the partnership, or purchase any assets, on behalf of the partnership, except for cash in full;

(c) Assign, transfer, pledge, compromise, or release any claim of the partnership except for full payment, or arbitrate, or consent to the arbitration of any of its disputes or controversies;

(d) Use the name, credit, or property of the partnership for any purpose other than a proper partnership purpose;

(e) Do any act detrimental to the partnership business or which would

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make it impossible to carry on that business;

(f) On behalf of the partnership, endorse any note, or act as an accomodation party, or otherwise become surety for any person or

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corporation.

14. ADDITIONAL PARTNERS. With the unanimous consent of all partners, additional persons may be admitted as partners effective as of the date of a regular meeting of the partnership.

15. BANKING. All funds of the partnership shall be deposited in its name in such checking account or accounts as shall be designated by a vote of partners who own a majority in amount of the capital accounts of all partners. All withdrawals are to be made upon checks signed by the Executive Secretary.

16. BOOKS AND RECORDS. The partnership books, to include adequate accounting records of all partnership business, shall be maintained at the principal office of the partnership and these shall be open to inspection by any of the partners at all reasonable times. The books shall be maintained on a calendar year basis, unless otherwise determined by the accountant for the partnership, and shall be closed and balanced at the end of each calendar year. Also at the end of each calendar year, a complete accounting of the affairs of the partnership shall be furnished to each partner, together with such appropriate information as may be required by each partner for the purpose of preparing his income tax return for that year. The partnership, by a vote of partners who own two-thirds in amount of the total capital accounts of all partners, may select a Certified Public Accountant to prepare the necessary Statements, tax returns, etc., as may be required by law or otherwise.

17. VOLUNTARY TERMINATION. The partnership may be dissolved and terminated upon the unanimous vote or agreement of partners, and shall be dissolved and terminated upon the failure of the remaining or surviving partners to exercise an option to purchase granted under paragraphs 18 and 19 of this Agreement. The partnership name may be sold with the other assets of the business. The assets of the partnership business

9304095229 5

shall be used and distributed in the following manner:

(a) To pay or provide for payment of all partnership liabilities and liquidating expenses and obligations;

(b) To discharge the balance of the capital accounts of the partners;

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(c) To discharge the balance of the income accounts of the partners;

(d) Distribute the remaining assets among the partners in accordance with the ratio of their respective capital accounts on that date.

18. RETIREMENT. Any Partner shall have the right to retire from the Partnership at the end of any fiscal year. Written notice of the intention to retire shall be served upon the other partners at the office of the Partnership at least ninety (90) days before the end of the fiscal year. The retirement of any Partner shall have no effect upon the continuance of the Partnership business.

(a) In the event that a Retiring Partner intends to sell or transfer his interest in the Partnership to an individual not having a Partnership interest in the Partnership, the Retiring Partner must first offer to sell his Partnership interest to the other Partner at a purchase price to be established pursuant to the provisions of Paragraph 19(b) and payment of the purchase price shall be made in accordance with the provisions of Paragraph 19(c). The remaining Partners' right to purchase the Retiring Partner's interest shall expire if it has not been exercised in writing within thirty (30) days of written notice of the Retiring Partner's offer to sell which notice shall be accompanied by the valuations of the Retiring Partner's Partnership interest.

(b) If the Remaining Partner does not exercise his option to purchase the Retiring Partner's interest in accordance with the provisions hereinabove, the Retiring Partner shall have the right to sell or transfer his interest in the Partnership to any person, firm or corporation without regard to the above-stated option rights, which right, however, shall expire at the end of the fiscal year following the year in which the Retiring Partner gave notice of his intention to retire. Such right to sell or transfer the Partnership interest shall be subject, however, to the approval of the Remaining Partners, which

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approval shall not be withheld unreasonably.

19. DEATH. (a) Upon the death of a Partner, the estate of the decedent shall have the option to remain a non-voting Partner in the Partnership or to sell the decedent's interest in the Partnership to the surviving

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Partner pursuant to Paragraph 19(b). The estate of the decedant shall have nine months from the date of death of the decedent to exercise said option in writing ("acceptance period").

(b) If the decedent's interest in the Partnership is purchased by the other Partner, the purchase price shall be the fair market value thereof, as of the month end prior to the date of death, as determined by appraisers as set forth in Paragraph 7 hereof.

No allowance shall be made for good will, trade name, patents or other intangible assets, except as those assets have been reflected on the Partnership books immediately prior to the decendent's date of death.

(c) The purchase price shall be paid as follows: Twenty-nine percent thereof in cash on the Closing Date as hereinafter defined; the balance by such Purchaser's execution and delivery of three (3) promissory notes, each in the principal amount of one-third (1/3) of the balance of the purchase price, each payable with interest at the prime interest rate charged by the First Fidelity Bank to the order of decedent's personal representative at a Morristown, New Jersey bank, the first of such notes to be payable twelve (12) months following the Closing Date and the remaining two (2) notes to be paid successively every twelve (12) months thereafter. Such note shall provide for the privilege of prepayment at any time (except within the year of closing) without premium or penalty and shall recite that all such notes shall become due at the option of the holder if all or any part of the principal or interest due under any such note remains unpaid for 30 days after the date on which the same becomes due. The closing date shall be the 30th day after the expiration of the acceptance period.

(d) Simultaneously with the delivery to the decedent's personal representative by the respective Purchasers of the notes and the initial cash payments above provided for, the decedent's representatives shall

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deliver to the respective Purchasers appropriate duly executed instruments of transfer and assignment assigning and transferring good and marketable title to the portion or portions of the decedent's entire Partnership interest thus purchased free from any liens or encumbrances

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or rights of others therein. The decedent's entire Partnership interest thus transferred shall comprise all of his right, title and interest in and to the Partnership, its firm name and all assets thereof including but not limited to the decedent's capital account as of the date of his death, his share of any undrawn profits for any fiscal year up to his death and his share of net profits from the beginning of the fiscal year in which his death occurs and for all periods after his death. The decedent's entire Partnership interest shall not be deemed to include any debts and liabilities of the Partnership to the decedent for loans and advances (other than by way of capital contribution) made by him which shall be repaid by the Partnership as required by the terms of such loans and advances and by law. The percentage of each Purchaser in the profits and losses of the Partnership shall be increased by that portion of the decedent's percentage therein equal to the fraction of the decedent's entire Partnership interest purchased by such Purchaser.

20. CONTINUATION. If the capital account of a withdrawing or deceased partner is purchased in accordance with an option to purchase granted under the provisions of paragraph 18 and 19 of this agreement, the partnership business shall not terminate but shall continue, as of the effective date of withdrawal, after an appropriate adjustment is made in the capital accounts of the remaining or surviving partners, as the case may be, in accordance with the provisions of the agreement.

21. NEGLIGENCE. Except to the extent that the partnership is insured against liability, a partner guilty of negligence or wrongdoing shall reimburse the partnership for damages sustained by it as the result of such negligence or wrongdoing.

22. EXPENSES. No partner shall charge to the partnership any expenses for automobiles, entertainment, professional dues, conventions, charitable contributions, club dues or any item connected with the

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operation or maintenance of his home, unless the prior written approval of all the partners is first obtained.

23. OTHER LEGAL DISABILITIES. In the event of the insolvency, bankruptcy, or adjudication of incompetency or any partner or partners,

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the partnership shall be terminated as of the end of the accounting year, and not before. Thereafter the other partner or partners shall have the rights, obligations, and elections hereinbefore prescribed in paragraph 19 for the surviving partner or partners in the case of death of one or more of the partners, and the receiver, trustee, committee, guardian, conservator, or other representative of the partner incurring any of such

aforementioned legal disabilities shall have all of the rights, obligation, interests and options prescribed for an estate of a deceased partner in such paragraph 19.

24. NOTICES. Wherever provision is made in this Agreement for the giving, service, or delivery of any notice, statement, or other instruments, such notice shall be deemed to have been duly given, served, and delivered, if mailed by United States Registered Mail, addressed to the party entitled to receive the same at his address set forth on the addendum attached hereto as Schedule A made a part of this Agreement; provided, however, that each party hereto may change his mailing address by giving to each other party hereto, by United States Registered or Certified Mail, written notice of election to change such address and of such new address. Except where otherwise specified in this Agreement, any notice, statement or other instrument shall be deemed to have been given, served and delivered on the date on which such notice was mailed as herein provided.

25. MERGER OF PRIOR AGREEMENTS. This Agreement contains the sole and entire agreement and understanding of the parties with respect to the entire subject matter hereof. Any an all prior discussions, negotiations, commitments and understandings relating thereto are hereby merged herin. This Agreement cannot be changed or terminated orally.

26. BENEFIT. The covenants and agreements herein contained shall inure to the benefit of and be binding upon the parties hereto and their respective executors, administrators, and assigns.

27. INDEMNITY FOR BREACH. Any partner who intentionally violates any of the terms, provisions and conditions of this Agreement, in addition to being subjected to the other remedies, liabilities and obligations that

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DEC-12-91 THU 10:44 SOBEL & CO P.01

may be imposed upon him therefor, shall save the other partners harmless of any and all claims, demands, and actions that may arise out of or by reason of such violation.

28. ARBITRATION. Any controversy or claim arising out of or relating to this agreement or to the interpretation, breach or enforcement thereof shall be submitted to three arbitrators and settled by arbitration in the Town of Morristown, New Jersey in accordance with the rules then obtaining of the of the American Arbitration Association, provided, however, and not withstanding any other provision of such rules if the matter submitted to arbitration shall involve a dispute as to the adjusted Partnership interest, such arbitration shall be held before three arbitrators, one of whom shall be a certified public accountant, a lawyer and a real estate appraisers holding the qualification of MAI. Any award made by a majority of such arbitration shall be final, binding, and conclusive on all parties hereto for all purposes and Judgement amy be entered thereon in any Court having jurisdiction thereof. Nothing herein contained shall be deemed to bar any part from obtaining appropriate equitable relief in a court of competent jurisdiction. None of the arbitrators, accountants or appraisers shall be employed, affiliated with any of the Partners of the Partnership.

IN WITNESS WHEREOF, the parties have hereunto affixed their signatures to this Agreement.

Pasquale V. Romano 12/31/87
PASQUALE V. ROMANO

Dominick V. Romano 12/31/87
DOMINICK V. ROMANO

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OGC 3885

MANATT, PHELPS, PHILLIPS & KANTOR
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
ATTORNEYS AT LAW
1200 NEW HAMPSHIRE AVENUE, N.W.
SUITE 200
WASHINGTON, D.C. 20036-6889

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

LOS ANGELES
1355 WEST OLYMPIC BOULEVARD
LOS ANGELES, CALIFORNIA 90064-1614
(310) 312-4000

December 23, 1991

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
91 DEC 23 PM 4:25

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

RE: MUR 3309 - Browning-Ferris Industries, Respondent

Dear Mr. Noble:

This letter is submitted on behalf of Browning-Ferris Industries ("BFI") in response to the above-referenced matter which arose from the Federal Election Commission ("Commission" or "FEC") audit of the 1988 Dole for President Committee. By notification of November 21, 1991, the FEC advised BFI that it found reason to believe that BFI violated 2 U.S.C. § 441b and 11 C.F.R. § 114.9(e) by failing to obtain advance payment for Dole campaign staff flights on the BFI airplane in the amount of $7,657.[1/]

For the following reasons set forth more fully below, the Commission should dismiss this matter as it pertains to BFI. The record before the Commission from the FEC audit clearly indicates that BFI made every effort to obtain advance payment in each instance in which its plane was made available to the Dole campaign.

Each of the five specific allegedly late payments in this referral resulted because of the care taken both by BFI and the

---

1/ The FEC Factual and Legal Analysis states that the total amount involved pertaining to the questioned flights is $7,657. The FEC Analysis did not itemize the particular flights questioned, nor did it provide any detail as to dates or specific circumstances. Because of the lack of detail, we requested from the General Counsel's office copies of the individual invoices and checks. The checks provided by OGC amount to $9,237. Part of this discrepancy can be accounted for because the payment of $2,414 was included in a check for $3,364. There is still, however, a discrepancy of $630 in the figures. We assume that this is a mathematical error. Copies of the checks are attached.

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Dole committee to insure that correct advance payments were made pursuant to the FEC regulations. Thus, both BFI and the Dole Committee regularly reviewed their records to insure that accurate payments were made in each instance. Two of the five payments were replacement checks for payments previously made in a timely fashion. Of the other three, one resulted from a review of the records and a request by BFI for a supplemental payment for additional persons later discovered to have been on three previous flights; one pertained to travel by a Member of Congress unrelated to campaign activity; and the final one was apparently an oversight that was corrected in a matter of days after the flight occurred.

Indeed, from a review of the records and correspondence it is difficult to imagine how a corporation allowing a candidate to use its airplane could have been more diligent in seeking to avoid any inadvertent prohibited corporate contribution.

Under 11 C.F.R. § 114.9(e) a political committee must pay in advance for a candidate, candidate's agent or person travelling on behalf of a candidate who uses an airplane which is owned or leased by a corporation. The records reviewed by the auditors clearly reflect that BFI and the Dole Committee complied in every respect with the requirement.

The first check at issue, dated July 8, 1987, was a reimbursement by the Dole Committee to BFI for $630 to cover the provision of air travel for Senator Charles Grassley on May 1, 1987 and June 27, 1987. Although Senator Grassley, who is the Senator from Iowa, travelled with Senator Dole to Iowa, BFI was advised by the Dole Committee that Senator Grassley did not participate in any political activity with Senator Dole. Thus, Senator Grassley's trip to Iowa was not campaign related and thus is not covered by 11 C.F.R. 114.9(e).

The second check in question, dated March 15, 1988, was a payment from the Dole Committee to BFI for provision of travel to Mrs. Elizabeth Dole and staff on March 7, 1988. Although the payment came one week late, the Dole campaign did reimburse BFI for all expenses calculated at first class fare as soon as it discovered that the payment had inadvertently not been made.

The third instance involved a check for $1,280, dated March 24, 1988. This payment was made to BFI when the company informed the Dole Committee that a review of the trip records indicated that additional persons had been on flights occurring on July 28, 1987, October 11, 1987 and November 18, 1987. When these discrepancies were brought to the Dole campaign's attention, they promptly issued a supplemental check.

The fourth check in question was for $2,709 and was dated May 5, 1987. This check, which reimbursed BFI for travel expenses

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incurred by Senator Dole and staff on May 1-3, 1987, was a replacement for an earlier one which had been incorrectly calculated by the Dole Committee.

The final payment in question involved reimbursements for travel incurred by Elizabeth Dole and staff between November 17-18, 1987. On November 20, 1987, the Dole Committee provided a check for $3,364.00 to BFI which reimbursed the company for $2,414.00 in expenses for air travel during the dates mentioned above, plus $950 dollars for a trip scheduled on November 22, 1987. Again, the records reflect that this was a corrected check replacing one previously issued.

It is clear from the foregoing explanations that BFI made every effort to insure full compliance with the Act. BFI established a compliance system, whereby BFI staff recorded and audited travel logs and monitored payments to assure that the company was fully reimbursed. In the cases noted above where discrepancies were found, BFI acted quickly to notify the Committee that additional payments were necessary. All such corrections were made promptly--in most instances within a few days of the trips.

Under the circumstances described above, no further action is warranted in this matter and we urge the Commission to close the file as it pertains to BFI.

Sincerely,

William C. Oldaker
Manatt, Phelps, Phillip & Kantor

93040952308

COMMITTEE, INC. Browning-Ferris Industries

CP-71, (82)

DATE	ACCOUNT	DESCRIPTION	AMOUNT
7/8/87	337	air travel	$630.00

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
91 DEC 23 PM 4:25

DOLE FOR PRESIDENT COMMITTEE, INC.
1828 L STREET, N.W., SUITE 805
WASHINGTON, D.C. 20036

№ 2147

SIGNET BANK
Virginia

68-408-405
560

July 8 87

Six hundred thirty dollars and no/100 ***630.00****

Browning-Ferris Industries

COPY NON NEGOTIABLE

⑈00002147⑈ ⑆056004089⑆ 652⑈0024669⑈

COMPTROLLER:

CAMPAIGN DIR:

337
Code: 7900-

Check Date:

Check No.:

✓ Give check to

___ Mail check

___ Other

1797

(3) (a)

RECEIVED
JUL - 8 1987

Request for Expenditure

PLEASE MAKE CHECK PAYABLE TO: Browning-Ferris Industries

ADDRESS: ~~1150 Connecticut Ave, NW~~ c/o Mr. Henry Phillips
~~Suite 500~~ P.O. Box 3151
~~Washington, DC 20036~~ Houston, TX 77253

IN THE AMOUNT OF: $630 CHECK NEEDED BY ASAP (DATE)

PURPOSE: Travel
6/27 DC-DM, IA Sen. Grassley #315
5/1 DC-DM, IA Sen. Grassley #315
~~Senator Grassley~~ ~~DEP~~ DO NOT ~~PAY~~ Co. DEP BUT
travel needs to be reimbursed under Senate rules. $630

DATE: 7/7/87

REQUESTED BY: SM

APPROVED BY

DIVISION DIR: SM
COUNSEL: SM
COMPTROLLER:
CAMPAIGN DIR:

337
Code: 7900-

Check Date:

Check No.:

✓ Give check to
Mail check
Other

1797

930409523310

93040952311

DOLE FOR PRESIDENT COMMITTEE, INC.
1828 L STREET, N.W., SUITE 805
WASHINGTON, D.C. 20036

No 2147

SIGNET BANK Virginia

68-408-405
560

July 8 1987

PAY Six hundred thirty dollars and no/100---------- DOLLARS $ ***630.00****

TO THE ORDER OF Browning-Ferris Industries

James L. Hagen

⑈0000214 7⑈ ⑆056004089⑆ 652⑈00246 69⑈

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
91 DEC 23 PM 4:25

BOB DOLE President

(B)

July 9, 1987

Mr. Bob Price
1150 Connecticut Avenue, NW
Suite 500
Washington, D.C. 20036

Dear Bob:

Please find enclosed check No. 2147. This check is for $630 and is to reimburse Browning-Ferris Industries for air travel provided for Senator Grassley on May 1 and June 27. Both trips were from Washington to Des Moines and the reimbursement is calculated at the one-way first class fare of $315. Although Senator Grassley participated in no campaign activity for our committee, the reimbursement is made pursuant to Senate Rules.

I appreciate your assistance.

Sincerely,

Scott E. Morgan
Campaign Counsel

cc: Senator Grassley

9300409523312

1828 L Street, N.W., Suite 805, Washington, D.C. 20036
(202) 223-9400
Paid for by Dole for President Exploratory Committee

DOLE FOR PRESIDENT COMMITTEE, INC. Browning Ferris Industries

CP-9/2

DATE	ACCOUNT	DESCRIPTION	AMOUNT
11/20/87	~~2037~~ 2056 337	Air Travel 7100-000-600 Replace check no.3540 dated 11/17/86	3,364.00

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
87 DEC 23 PM 4:26

DOLE FOR PRESIDENT COMMITTEE, INC.
1828 L STREET, N.W., SUITE 806
WASHINGTON, D.C. 20036

No 3585

SIGNET BANK
Virginia

68-408/560 406

November 20, 87

Three thousand three hundred sixtyfour and no/100 3.364.00

Browning Ferris Industries
1150 Connecticut Ave, NW - Suite 500
Washington, DC 20036

Attn: Mr. Bob Price

COPY NON-NEGOTIABLE

⑈00003585⑈ ⑆056004089⑆ 652⑈0024669⑈

7100-000-600

COMPTROLLER:

CAMPAIGN DIR: OK

Code:

Check Date:

Check No.:

X Give check to MM.

___Mail check

___Other

Resubmitted on 11/20-

ENTERED 8730

original check being returned!

Exploratory Committee

Request for Expenditure

PLEASE MAKE CHECK PAYABLE TO: BFI Browning-Ferris Industries.

ADDRESS:

1150 Connecticut Ave., NW. suite 500
Washington D.C. 20036

attn: Mr. Bob Price

IN THE AMOUNT OF: ~~#4139~~ ~~2212~~ 3,364.00 (1:00pm)

CHECK NEEDED BY 11-17-87 (DATE)

PURPOSE: Elizabeth Dole & Staff Travel

DATE: 11-16-87

REQUESTED BY: Mary Mills

7100-000-600

APPROVED BY

DIVISION DIR: [signature]

COUNSEL: [signature]

COMPTROLLER: Hegn

CAMPAIGN DIR: [signature] oc

Code: _____

Check Date: _____

Check No.: _____

X Give check to MM.

__ Mail check

__ Other _____

Resubmitted on 11/20-

ENTERED 8730

original check being returned!

23040952314

Senator Bob Dole

November 17, 1987

Browning-Ferris Industries
Mr. Bob Price
1150 Connecticut Avenue N.W.
Suite 500
Washington, D.C. 20036

Dear Mr. Price:

This is to confirm payment made on November 17, 1987 to cover expenses incurred by Elizabeth Dole and staff on that date. This payment is made according to Federal Election Commission regulations, calculated by your standard charter rate. The following is a breakdown of expenses:

11/17/87 Washington, DC to Houston, Texas (Elizabeth Dole, Christy Varney)	($372 x 2)	$744.00
11/18/87 Houston, Texas to St. Louis, Missouri (Dole, Varney, Dave Owen)	($271 x 3)	$813.00
St. Louis, MO. to Kirksville, MO. (Dole, Kathleen Harrington)	($120 x 2)	$240.00
Kirksville, MO. to Milwaukee, WI. (Dole, Harrington)	($343 x 2)	$686.00
Milwaukee, WI. to Mason City, IA. (Dole, Mark Romig)	($353 x 2)	$706.00
DesMoines, IA. to Washington, D.C. (Dole, Romig)	($475 x 2)	$950.00
TOTAL AMOUNT		$4139.00

We appreciate your assistance.

Sincerely,

Scott E. Morgan
Campaign Counsel

Paid for by Dole for President Exploratory Committee, 1828 L Street, N.W., Washington, D.C. 20036.

9304095231 5

Senator Bob Dole

November 20, 1987

Browning-Ferris Industries
Mr. Bob Price
1150 Connecticut Avenue N.W.
Suite 500
Washington, D.C. 20036

Dear Mr. Price:

This is to confirm payment made on November 20, 1987 for
expenses incurred by Elizabeth Dole and staff. Payment was
made according to Federal Election Commission regulations
calculated by your standard charter rate.
The following is a breakdown of expenses:

11/17/87 Washington, DC to Houston, Texas (Elizabeth Dole, Christy Varney)	($372 x 2) $744.00
11/18/87 Houston, Texas to St. Louis, Missouri (Dole)	($271 x 1) $271.00
St. Louis, MO. to Kirksville, MO. (Dole, Kathleen Harrington, John Thompson)	($120 x 3) $360.00
Kirksville, MO. to Milwaukee, WI. (Dole, Harrington)	($343 x 2) $686.00
Milwaukee, WI. to Mason City, IA. (Dole)	($353 x 1) $353.00
11/22/87 DesMoines, IA. to Washington, D.C. (Dole, Mark Romig)	($475 x 2) $950.00
TOTAL AMOUNT	$3364.00

We appreciate your assistance.

Sincerely,

Scott E. Morgan
Campaign Counsel

Paid for by Dole for President Exploratory Committee, 1828 L Street, N.W., Washington, D.C. 20036.

Dole for President
Exploratory Committee

CP-91-2

B7

Request for Expenditure

PLEASE MAKE CHECK PAYABLE TO: Browning-Ferris Industries

ADDRESS:

IN THE AMOUNT OF: $2,709 CHECK NEEDED BY ASAP (DATE)

PURPOSE: Once again — Correction of Check #1554
Travel of Sen, Sec. & Glowen on 5/1-3/3
DC, Dn, Lou, DC.

DATE: 5/5/87

REQUESTED BY: Sgt Mongtl

APPROVED BY

DIVISION DIR: Sm

COUNSEL: Sm

COMPTROLLER: Hayes

CAMPAIGN DIR: WB

Code:

Check Date: 5/5/87

Check No.: 1554

___Give check to

___Mail check

___Other

#237 - Secretary
#2,472 - Tour

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
91 DEC 23 PM 4:26

7304029523717

BOB DOLE President

May 5, 1987

Mr. Bob Price
1150 Connecticut Avenue, NW
Suite 500
Washington, D.C. 20036

Dear Bob:

Enclosed please find a check to cover air travel expense incurred by Senator Dole and staff on May 1-3, 1987. This check replaces the earlier one incorrectly calculated by DFPEC. We apologize for the delay and any inconvienence. This payment is made according to Federal Election Committee regulations, calculated by fair market value. The following is a breakdown of expenses:

5/1/87 3 1st class fares:	Washington, DC - Des Moines, IA	$945.00
5/1/87 3 1st class fares:	Des Moines, IA - Louisville, KY	1053.00
5/3/87 3 1st class fares:	Louisville, KY - Washington, DC	711.00

Total Amount Due: $2709.00

I hope that this calculation meets with your approval. I truly appreciate your help in providing air transportation for the Senator on this trip.

Sincerely,

Scott E. Morgan
Campaign Counsel

SEM:jws

1828 L Street, N.W., Suite 805, Washington, D.C. 20036
(202) 223-9400
Paid for by Dole for President Exploratory Committee

9304095231 8

9304095231 9

DOLE FOR PRESIDENT COMMITTEE INC.
1828 L STREET, NW
SUITE 805
WASHINGTON, DC 20036

1554

68-409-405
560

05 May 19 87

PAY TO THE ORDER OF Browning-Ferris Industries | $ 2,709.00

Two Thousand Seven-Hundred Nine and 00/100 DOLLARS

SIGNET BANK
Virginia

FOR

James L. Hayes

⑈0001554⑈ ⑆056004089⑆ 652⑈00246691⑈

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
91 DEC 23 PM 4:26



(A)

May 5, 1987

Mr. Bob Price
Browning Ferris Industries
1150 Connecticut Avenue, NW
Suite 500
Washington, D.C. 20036

Dear Bob:

Enclosed please find check #1554, covering air travel expense incurred by Senator Dole and staff on May 1-3, 1987. This check replaces check #1539 dated May 1, which was incorrectly calculated by DFPEC. We apologize for the delay and any inconvienence. This payment is made according to Federal Election Commission regulations, calculated by fair market value. The following is a breakdown of expenses:

5/1/87 3 lst class fares:	Washington, DC - Des Moines, IA	$945.00
5/1/87 3 lst class fares:	Des Moines, IA - Louisville, KY	1053.00
5/3/87 3 lst class fares:	Louisville, KY - Washington, DC	711.00

Total Amount Due: $2709.00

I hope that this calculation meets with your approval. I truly appreciate your help in providing air transportation for the Senator on this trip.

Sincerely,

Scott E. Morgan
Campaign Counsel

SEM:jws

1828 L Street, N.W., Suite 805, Washington, D.C. 20036
(202) 223-9400
Paid for by Dole for President Exploratory Committee

23040952320



May 5, 1987

Mr. Bob Price
Browning Ferris Industries
1150 Connecticut Avenue, NW
Suite 500
Washington, D.C. 20036

Dear Bob:

This letter is to serve as an explanation of why DFPEC's payment to Browning Ferris Industries for travel by Senator Dole and staff did not include payment for Senator Grassley.

Federal Regulations governing the use of corporate aircraft (11 CFR 114.9(e)) require that a political committee pay in advance for "a candidate, candidate's agent, or person traveling on behalf of a candidate who uses an airplane which is owned or leased by a corporation..."

Although Senator Grassley travelled with Senator Dole to Iowa, he did not participate in any political activity for Senator Dole while there. Senate Rules do, however, require reimbursement within a reasonable time. I will be in contact with you to insure payment is made for Senator Grassley's travel.

Sincerely,

Scott E. Morgan
Campaign Counsel

9304095321

1828 L Street, N.W., Suite 805, Washington, D.C. 20036
(202) 223-9400
Paid for by Dole for President Exploratory Committee

DOLE FOR PRESIDENT COMMITTEE, INC.
Browning Ferris Industries

DELUXE - FORM WVO-S V-2

CP-11/1 (B6)

DATE	DESCRIPTION	AMOUNT
3-15	air travel E.Dole 7100-000-600	$1,254.00

DOLE FOR PRESIDENT COMMITTEE, INC.
1828 L STREET, N.W., SUITE 805
WASHINGTON, D.C. 20036

SIGNET BANK
Virginia
Vienna, VA

5481

15 March 19 88

68-408/560 405

PAY One Thousand Two Hundred Fifty Four and 00/100 DOLLARS $1,254.00

TO THE ORDER OF
Browning-Ferris Industries
1150 Connecticut Ave. NW
Suite 500
Washington, DC 20036

NOT NEGOTIABLE

⑈0000548 1⑈ ⑆056004089⑆ 652⑈0024669⑈

DIR OF ADMIN:

DPTY CHAIRMAN:

A/P CODE: 337

G/L CODE:

ENTERED 20216

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
91 DEC 23 PM 4:26

✓ GIVE CHECK TO JS.

_____ MAIL CHECK

_____ OTHER _____

(3)(b)

DOLE FOR PRESIDENT

REQUEST FOR EXPENDITURE

E CHECK PAYABLE TO: Browning - Ferris Industries

1150 Connecticut Ave., N.W.
Ste 500
Washington DC 20036
Attn: Bob Price

IN THE AMOUNT OF: $ 1254.00 CHECK NEEDED BY: 3/17 (date)

PURPOSE: travel 3/7.

DATE: 2/15

REQUESTED BY: Scott Morgan

APPROVED BY:

DIVISION DIR:

COUNSEL:

COMPTROLLER:

DIR OF ADMIN:

DPTY CHAIRMAN:

A/P CODE: 337

G/L CODE:

ENTERED 20216

✓ GIVE CHECK TO JS.

____ MAIL CHECK

____ OTHER

DOLE
PRESIDENT
1828 L Street, N.W. • Suite 805
Washington, D.C. 20036
(202) 223-9400
(TDD) (202) 223-9400

March 14, 1988

Mr. Robert V. Price
Browning Ferris Industries
1150 Connecticut Avenue, N.W.
Suite 500
Washington, D.C. 20036

Dear Mr. Price:

Enclosed please find a check to cover travel expenses incurred by Secretary Dole and and her staff on March 7, 1988. This payment is made according to Federal Election Commission Regulations calculated by first class fare. The following is a breakdown of expenses:

3/7	6 1st class fares Winston Salem,NC-Asheville,NC (Dole, Romig, Wellborn, Hanford, Bechtel, Blackwelder)	$94.00	$564.00
3/7	3 1st class fares Asheville,NC-Washington,DC (Dole, Romig, Wellborn)	$230.00	$690.00
		TOTAL	$1254.00

I hope this calculation meets with your approval. Thank you for your assistance.

Sincerely,

Scott E. Morgan
Chief Counsel

SEM:jws

Enclosure

Paid for by Dole for President Committee

93040952324

DOLE FOR PRESIDENT
COMMITTEE, INC.
Browning Ferris Indust

THE ATTAC... IF NOT CORRE... RE... THIS STATEMENT ... OF ITEMS DESCRIBED BELOW NOTIFY US PROMPTLY ... NO RECEIPT DESIRED

DELUXE - FORM WVO-3 V-2...

DATE	DESCRIPTION			AMOUNT
3-15	air travel	E. Dole	7100-000-600	$1,254.00

94

DOLE FOR PRESIDENT COMMITTEE, INC.
1828 L STREET, N.W., SUITE 805
WASHINGTON, D.C. 20036

SIGNET BANK
Vienna, VA Virginia

5481

68-408/560 405

15 March 1988

PAY One Thousand Two Hundred Fifty Four and 00/100---------- DOLLARS $1,254.00

TO THE ORDER OF
Browning-Ferris Industries
1150 Connecticut Ave. NW
Suite 500
Washington, DC 20036
ATTN: Bob Price

James L. Hagler

⑈0000548 1⑈ ⑆056004089⑆ 652⑈00 24669⑈

DELUXE CHECK PRINTERS

30409523225

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
91 DEC 23 PM 4:26

DOLE
PRESIDENT
1828 L Street, N.W. • Suite 805
Washington, D.C. 20036
(202) 223-9400
(TDD) (202) 223-9400

March 14, 1988

Mr. Robert V. Price
Browning Ferris Industries
1150 Connecticut Avenue, N.W.
Suite 500
Washington, D.C. 20036

Dear Mr. Price:

Enclosed please find a check to cover travel expenses incurred by Secretary Dole and and her staff on March 7, 1988. This payment is made according to Federal Election Commission Regulations calculated by first class fare. The following is a breakdown of expenses:

3/7	6 1st class fares (Dole, Romig, Wellborn, Hanford, Bechtel, Blackwelder)	Winston Salem,NC-Asheville,NC	$94.00 $564.00
3/7	3 1st class fares (Dole, Romig, Wellborn)	Asheville,NC-Washington,DC	$230.00 $690.00
		TOTAL	$1254.00

I hope this calculation meets with your approval. Thank you for your assistance.

Sincerely,

Scott E. Morgan
Chief Counsel

SEM:jws

Enclosure

Paid for by Dole for President Committee

DATE	DESCRIPTION		
3-24	air travel	7900-000-600	$1,280.00

CP-71

B7

DOLE FOR PRESIDENT COMMITTEE, INC.
1828 L STREET, N.W., SUITE 805
WASHINGTON, D.C. 20036

SIGNET BANK
Virginia
Vienna, VA

5541

24 March 19 88

68-408/560 405

PAY 11 Browning-Ferris Industries Eighty and 00/100 DOLLARS $ 1,280.00

TO THE ORDER OF
Browning-Ferris Industries
1150 Connecticut Avenue NW
Washington, DC 20036
ATTN: Bob Price

ENTERED

NOT NEGOTIABLE

⑈00005541⑈ ⑆056004089⑆ 652⑈0024669⑈

REQUESTED BY: Scott Morgan

DIVISION DIR:

COUNSEL:

COMPTROLLER:

DIR OF ADMIN:

DPTY CHAIRMAN:

ENTERED 21521

A/P CODE: 337

G/L CODE: 7900-000-600

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
91 DEC 23 PM 4:26

✓ GIVE CHECK TO

____ MAIL CHECK

____ OTHER

(3)(c)

DOLE
PRESIDENT
1828 L Street, N.W. • Suite 805
Washington, D.C. 20036
(202) 223-9400
(TDD) (202) 223-9400

March 14, 1988

Mr. Robert V. Price
Browning Ferris Industries
1150 Connecticut Avenue, N.W.
Suite 500
Washington, D.C. 20036

Dear Mr. Price:

Enclosed please find a check for $1280.00 to cover additional air travel expenses incurred by staff aides to Senator and Secretary Dole on the dates listed below. I appreciate your bringing these discrepancies to the campaign's attention.

This payment is made according to Federal Election Commission Regulations calculated by first class fare. The following is a breakdown of additional expenses incurred:

7/28	1 1st class fare Boston,MA-Washington,DC (Barry Gottehur)		$297.00
10/11	1 1st class fare Boston,MA-Washington,DC (aide)		$297.00
11/18	2 1st class fares St. Louis,MO-Kirksville,MO (Margaret Warner, Marian Loche)	$120.00	$240.00
11/18	2 1st class fares Kirksville,MO-Milwaukee,WI (Margaret Warner, Marian Loche)	$343.00	$686.00
			$1520.00
10/4	Payment for cancelled trip	CREDIT	$240.00
		TOTAL	$1280.00

I apologize for any inconvenience. Thank you for your assistance.

Sincerely,

Scott E. Morgan
Chief Counsel

SEM:jws

Enclosure

Paid for by Dole for President Committee.

23040955233 28

DOLE FOR PRESIDENT

REQUEST FOR EXPENDITURE

RECEIVED
MAR 19 1996

PLEASE MAKE CHECK PAYABLE TO: Browning-Ferris Industries

ADDRESS: 1150 Connecticut Ave., N.W.
Ste 500
Washington, DC 20036
Attn: Bob Price

IN THE AMOUNT OF: $1280. CHECK NEEDED BY: ~~3/11~~ (date)

PURPOSE: Travel payment. See attached

DATE: 3/15

REQUESTED BY: Scott Morgan

ENTERED 21521

A/P CODE: 337

G/L CODE: 7900-000-600

APPROVED BY:

DIVISION DIR:

COUNSEL: S

COMPTROLLER: Hay

DIR OF ADMIN:

DPTY CHAIRMAN:

✓ GIVE CHECK TO

____ MAIL CHECK

____ OTHER

DOLE FOR PRESIDENT
,COMMITTEE, INC.

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.

Browning INdustries DELUXE - FORM WVO-3

DATE	DESCRIPTION		AMOUNT
3-24	air travel	7900-000-800	$1,280.00

V-2

DOLE FOR PRESIDENT COMMITTEE, INC.
1828 L STREET, N.W., SUITE 805
WASHINGTON, D.C. 20036

SIGNET BANK
Vienna, VA Virginia

5541

24 March 19 88

68-408/560 405

PAY One Thousand Two Hundred Eighty and 00/100---------- DOLLARS $ 1,280.00

TO THE ORDER OF
Browning-Ferris Industries
1150 Connecticut Avenue NW
Washington, DC 20036
ATTN: Bob Price

James L. Hagen

⑈0000554 1⑈ ⑆056004089⑆ 652⑈0024669⑈

⑈0040952330

DELUXE CHECK PRINTERS

This Credit involves
3 different matters
Jfw

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
91 DEC 23 PM 4:26

DOLE
PRESIDENT
1828 L Street, N.W. • Suite 805
Washington, D.C. 20036
(202) 223-9400
(TDD) (202) 223-9400

March 14, 1988

Mr. Robert V. Price
Browning Ferris Industries
1150 Connecticut Avenue, N.W.
Suite 500
Washington, D.C. 20036

Dear Mr. Price:

Enclosed please find a check for $1280.00 to cover additional air travel expenses incurred by staff aides to Senator and Secretary Dole on the dates listed below. I appreciate your bringing these discrepancies to the campaign's attention.

This payment is made according to Federal Election Commission Regulations calculated by first class fare. The following is a breakdown of additional expenses incurred:

7/28	1 1st class fare Boston,MA-Washington,DC (Barry Gottehur)		$297.00
10/11	1 1st class fare Boston,MA-Washington,DC (aide)		$297.00
11/18	2 1st class fares St. Louis,MO-Kirksville,MO (Margaret Warner, Marian Loche)	$120.00	$240.00
11/18	2 1st class fares Kirksville,MO-Milwaukee,WI (Margaret Warner, Marian Loche)	$343.00	$686.00
			$1520.00
10/4	Payment for cancelled trip	CREDIT	$240.00
		TOTAL	$1280.00

I apologize for any inconvenience. Thank you for your assistance.

Sincerely,

Scott E. Morgan
Chief Counsel

SEM:jws

Enclosure

Paid for by Dole for President Committee

OGL3871

MANATT, PHELPS, PHILLIPS & KANTOR
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
ATTORNEYS AT LAW
1200 NEW HAMPSHIRE AVENUE, N.W.
SUITE 200
WASHINGTON, D.C. 20036-6869

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

LOS ANGELES
1355 WEST OLYMPIC BOULEVARD
LOS ANGELES, CALIFORNIA 90064-1514
(310) 312-4000

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
DEC 20 PM 3:58

December 19, 1991

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

RE: MUR 3309, Dave Williams

Dear Mr. Noble:

This response is filed on behalf of Dave Williams in the above-referenced matter. By notification dated November 21, 1991, the Commission advised Mr. Williams that it had found reason to believe that he exceeded the contribution limit to the 1988 Dole for President Committee. According to the Factual and Legal Analysis accompanying this notification, the Commission incorrectly alleges that Mr. Williams exceeded the contribution limit by $2,000. For the following reasons, the Commission should dismiss this matter as it pertains to Mr. Williams.

On March 30, 1987, Mr. Williams made a contribution of $1,000 to the Dole Committee. On October 15, 1987, Mr. Williams and his spouse made an additional contribution of $2,000 in the aggregate to attend a Dole fundraising event. Both checks were drawn on a joint account of Dave and Reba Williams. The first check was signed only by Dave Williams. The second check was signed by Dave Williams, but the accompanying contributor card was signed by both Dave and Reba Williams.

1. The Commission has incorrectly attributed the entire second contribution of $2,000 to Dave Williams.

As evidenced by the contributor card accompanying the $2,000 October check, that contribution should be attributed equally to Dave and Reba Williams. The contribution was made from a joint account and the contributor card accompanying it contained signatures of both Dave and Reba Williams. These signatures on the contributor card satisfy the requirement set forth in 11 C.F.R. § 9034.2(c)(1) that "to be attributed equally to other joint tenants of the account, the check or other accompanying document shall contain the signature(s) of the joint tenant(s)." This section further provides that in the absence of a specific

9304095233 2

attribution, a joint check will be attributed equally to the contributors who have signed the check or other written documentation. Thus, the check written on October 15, 1987, and accompanied by the contributor card containing the signatures of both joint tenants must be attributed equally to Dave and Reba Williams.

2. Dave Williams was not aware that his second check would be considered an excessive contribution unless it was specifically earmarked for the general election compliance fund.

Under the Commission's regulations a contribution made to a presidential candidate prior to the date of nomination is presumed to be made for the primary unless it is designated in writing for another election. Mr. Williams was unaware that his second contribution of $1,000 to the Dole Committee was thus in excess of his $1,000 primary limit unless it was designated in writing for the general election compliance fund.

While the Act certainly assumes that individual contributors are responsible to be aware of the contribution limits, the Commission's regulations recognize the reality that the burden for monitoring possible excessive contributions must rest primarily with the recipient committee. Thus, the regulations permit a committee treasurer to deposit possible excessive contributions and to seek reattribution where necessary, either to another joint tenant of the account or to another election. 11 C.F.R. § 110.1(k)(3).

Therefore, in a case such as this, where the individual could permissibly have designated the second contribution to the general election compliance fund, it is unwarranted for the Commission to take any action against the contributor.

As set forth in his accompanying affidavit, Mr. Williams had no intention of making an excessive contribution to the Dole campaign. For the foregoing reasons, we request that the Commission take no further action and dismiss this matter as it pertains to Mr. Williams.

Sincerely,

Lyn Utrecht

Lyn Utrecht
Manatt, Phelps, Phillips & Kantor

9304095233

Before the Federal Election Commission

In the Matter of Dave Williams	MUR 3309

AFFIDAVIT OF DAVE WILLIAMS

I, Dave Williams, being duly sworn, state as follows:

1. I made a contribution of $1,000 on March 30, 1987 to the Dole for President campaign. On October 15, 1987 my wife and I made an additional contribution of $2,000 to the campaign. This contribution was accompanied by a contributor card signed by both Dave and Reba Williams.

2. I was unaware of the fact that I should have designated in writing my portion of the $2,000 check to the general election campaign to distinguish its purpose from that of my previous $1,000 donation to the primary campaign.

3. Since the second check for $2,000 was a joint contribution, my personal contribution to the Dole for President campaign including the first check and half of the second brought my total contribution to $2,000 for the campaign cycle.

4. It was never my intention to contribute an excessive amount of money to the campaign.

I hereby swear or affirm under penalty of perjury that, to the best of my knowledge and belief, the foregoing statements are true and correct.

Dave Williams

9304095233 4

Post Office Box 5630
Denver, Colorado 80217
(303) 721-5500

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

91 DEC 24 AM 11:32

TELE-COMMUNICATIONS, INC.

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

91 DEC 27 AM 10:57

December 19, 1991

General Counsel's Office
Federal Election Commission
999 E Street, NW
Washington, D.C. 20463

Re: MUR 3309
Tele-Communications, Inc., PAC
and Gary K. Bracken, Treasurer

Dear Sir or Madam:

We are in receipt of your letter of November 21, 1991, regarding a possible violation of 2 U.S.C. Section 441a(a)(1)(A).

Please be advised that we are interested in pursuing pre-probable cause conciliation. In connection with our request for conciliation, please consider the fact that we requested a partial refund when it came to our attention that we had made an overpayment to Dole for President. Dole for President refunded $1,000 of the November 3, 1987 contribution.

We have recently relocated our offices to 5619 DTC Parkway, Englewood, CO 80111-3000. Please send any further correspondence to this address.

Very truly yours,

Colin R. Stoner

Colin R. Stoner
Assistant Treasurer

An Equal Opportunity Employer

9304095233 5

LAW OFFICES OF
SCHLEICHER, LATZ, LOYD, PATTERSON & LACY
A PROFESSIONAL CORPORATION

CHARLES P. SCHLEICHER**
ROBERT C. LATZ
ROBERT W. LOYD*
DOUGLAS J. PATTERSON
WILLIAM S. LACY, JR.
SCOTT E. MORGAN*
MARK A. FIRESTONE
ERIC C. PEDEN**
STEVEN J. SCHLEICHER**
MICHELLE HURSH

*ADMITTED IN KANSAS
**ADMITTED IN KANSAS AND MISSOURI
ALL OTHERS ADMITTED IN MISSOURI

418 PLAZA CENTER BUILDING
800 WEST 47TH STREET
KANSAS CITY, MISSOURI 64112-1246
TELEPHONE (816) 756-0800

PLEASE REPLY TO MISSOURI OFFICE

KANSAS OFFICE
9808 WENONGA
LEAWOOD, KANSAS
66206

TELECOPIER (816) 561-3185

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM
91 DEC 24 AM 9:59

December 19, 1991

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

Re: MUR 3309
Dole for President Committee, Inc.

Dear Anne:

In behalf of the Dole for President Committee, Inc., I am responding to Mr. McGarry's letter of December 5, 1991, which I received on December 12, 1991.

The Committee is very interested in pursuing pre-probable cause conciliation and hereby make that request. However, I must say that we are hesitant to pursue active conciliation until the Commission has acted upon our June 11, 1991 objections to the initial repayment determination. I presume that the final repayment determination will be issued soon.

The Committee would also be interested in seeing some of the materials discussed in the Factual and Legal Analysis. I note that I received a significant amount of material in yesterday's (December 18th) mail but have not yet reviewed it.

Please let me know at your earliest opportunity yours and the Commission's intentions with this matter. I know it is the Committee's sincere desire to move as quickly as possible to resolve all outstanding issues.

Sincerely,

Scott E. Morgan

SEM/hjp

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
91 DEC 27 AM 10:57

93040952336

Geraldine A[illegible]
Agency Control[illegible]

MassMutual

One Benham Place
9400 North Broadway, Suite 700
Oklahoma City, OK 73114-7493
405 478-5360

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
91 DEC 27 AM 10:58

December 17, 1991

Mr. John Warren McGarry
Chairman
Federal Election Commission
Washington, D. C. 20463

RE: MUR 3309
H & W Aviation

Dear Mr. McGarry:

In response to your November 21, 1991 letter addressed to my attention, I would like to first make you aware that H & W Aviation was never a corporation. It was formed as a joint venture in 1983 and disbanded in 1990 when the aircraft was sold. During this period of time, the two owners used the aircraft for various trips, paid the particular costs associated with those trips, and divided the overhead costs on a pro-rated basis.

Also during this time, because the aircraft wasn't used full time by the partners, the pilots performed some charter service, for which an hourly rate was charged. The excess revenues from these charters were used to reduce the overhead costs shared by the partners.

It was agreed that the pilots would pick up some members of the Dole Campaign staff in Washington D. C., deliver them to various cities in the midwest and return them to Washington D. C. They had been quoted an hourly rate for the use of the aircraft, which was consistent with other charter flights. After the trip, we received a letter from a member of the Dole Campaign staff asking us to reduce the charges to $7,000, which they felt was equal to first class fares for the trips and people involved. I would have no way of knowing how accurate this figure might be. The $7,000 was less than the actual out of pocket costs for this trip, and the intent of the partners was to cover these costs plus have excess revenue to cover overhead expenses of the time added to the aircraft's engines.

The charter occurred on March 4 and 5, 1988, and the bill was not paid till June. In an effort to collect as much as possible, it was agreed to reduce the charges slightly from the original quote. This bill might have otherwise been uncollectable.

Sincerely,

Geraldine Ann Price

Geraldine Ann Price

cc: Senator Dole

Massachusetts Mutual Life Insurance Company
and affiliated insurance companies
Springfield, MA 01111-0001

The Wilson Financial Group
J. Hawley Wilson, Jr., CLU
General Agent

23040952337

LAW OFFICES OF
NIELSEN, MERKSAMER,
HODGSON, PARRINELLO & MUELLER
A PARTNERSHIP INCLUDING A PROFESSIONAL CORPORATION
591 REDWOOD HIGHWAY, #4000
MILL VALLEY, CALIFORNIA 94941
TELEPHONE (415) 389-6800

SACRAMENTO
770 L STREET, SUITE 800
SACRAMENTO, CALIFORNIA 95814
TELEPHONE (916) 446-6752

SAN FRANCISCO
650 CALIFORNIA STREET, SUITE 2650
SAN FRANCISCO, CALIFORNIA 94108
TELEPHONE (415) 989-6800

December 18, 1991

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
91 DEC 27 AM 10:59

John Warren McGarry, Chair
Jeffrey Long, Esq.
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Re: MUR 3309

Dear Sirs:

This letter is in response to your request for information regarding our client, the Fluor Corporation Public Affairs Committee (Fluor PAC), a multi-candidate separate segregated fund of Fluor Corporation. You inquired about two PAC contributions to the Dole for President Committee in 1987. Based on the following factual information, we believe the Commission will find that Fluor PAC did not violate the Federal Election Campaign Act.

As your letter correctly states, Fluor PAC made two contributions to the Bob Dole for President Committee in 1987. The first contribution made on June 19, 1987 was for $5,000 to the Bob Dole for President Exploratory Committee to support his candidacy for President. (Check # 1298.) The second contribution made on October 16, 1987 to the Bob Dole for President Committee was for $2,000. (Check # 1319.) This contribution was made to help fund Doles's "legal and accounting compliance fund", as permitted by 11 CFR Section 9003.3 if he became the Republican nominee for President. According to this section, presidential candidates may establish a legal and accounting compliance fund prior to being nominated or selected as the candidate of a political party for the Office of President. See 11 CFR § 9003.3 [a][1][i]

Fluor PAC's intention in making this second contribution was that it be used solely for deposits into the Dole legal and accounting compliance fund. First, Fluor PAC's internal authorization for the $2,000 contribution specifically directed the issuer of the contribution to "make sure funds (are) earmarked for legal and accounting fund". (See Exhibit A.) Second, both the internal authorization and the check stub describe the contribution as a "1988 General Election. Compliance fund contribution". (See Exhibit B.) Third, before making the second contribution, a Fluor PAC call was made to us as its political law legal counsel to discuss the permissibility of the

9304095233 8

additional $2,000 contribution. Our memo confirms that Fluor PAC could not make an additional contribution to the Committee for campaign purposes but could make a contribution to the "Legal and Accounting Compliance Fund". A copy of this memo will be made available if necessary.

Fourth, the Fluor PAC Corporation PAC 3X Report for the period July 1 through December 31, 1987 specifically identifies that the $2,000 contribution as "earmarked for legal and accounting funds". (See Exhibit C.)

Fifth, the Dole for President counsel, Scott Morgan, wrote Fluor PAC a letter stating that it erroneously "deposited check Number 1319, which (was) earmarked for the Compliance Fund into the general account". The Dole Committee asked Fluor PAC to sign a statement requesting that the $2,000 "be transferred to the 'Legal and Accounting Compliance Fund'". Fluor PAC's Chairman, Bob Fluor signed and returned the letter to the Dole Committee. (See Exhibit D.) We believe that these factors evidence Fluor PAC's indisputable intention to have the $2,000 check deposited only in the Dole for President legal and accounting compliance fund.

We look forward to an early resolution of this matter and hope to be of continued assistance to you. Please, feel free to call me with any questions.

Sincerely,

Chip Nielsen

Vigo G. (Chip) Nielsen, Jr.

VGN/LHW/cn

9304095239

AUTHORIZATION FOR
POLITICAL CONTRIBUTION OR EXPENDITURE
(REPORTABLE AND NONREPORTABLE)

EXHIBIT A

Date: September 3, 1987

AMOUNT: $2000.00

FORM: ☐ Cash ☒ Check ☐ In-kind _____

DONOR: ☐ Fluor Corporation ☒ Fluor PAC ☐ Other _____

RECIPIENT:

Name Bob Dole for President

Address 515 South Flower Street, Los Angeles, CA 90071

Identification Number C002113850

If Committee, name of Treasurer _____

PURPOSE OF CONTRIBUTION OR EXPENDITURE:

☒ Support or opposition of candidate. (List candidate and election, specifying date of election and whether primary, general or other.)

~~Bob Dole fundraiser on October 19, 1987.~~ 1988 General election.

COMPLIANCE FUND CONTRIBUTION.

☐ Qualification of ballot measure. (Specify measure and qualification deadline.)

_____ ☐ Support ☐ Oppose

_____

☐ Support or opposition of ballot measure. (Specify measure and date of election.)

_____ ☐ Support ☐ Oppose

_____

☐ Support or opposition of activity to influence legislative or administrative action ("lobbying"). (Specify bill number or agency.)

_____ ☐ Support ☐ Oppose

_____

☐ Other _____ legal and accounting fund

_____

APPLICABLE LIMITATIONS: ☒ make sure funds earmarked for ~~disbar~~ are at limit. ~~[illegible]~~

[If contribution or expenditure ~~relates~~ to a Federal election or other election or activity for which contribution or expenditure limits are in effect or for which extraordinary reporting requirements apply (e.g., certain state elections such as Alaska and certain local elections such as Orange County), check above and complete below.]

8-80 $2500 7-82 $1000 2-84 $2000 2-85 $3000 1-86 $1000 3-87 $5000 6-87 $5000

Amounts previously contributed or expended (specify election): $19,500.00

Total amounts contributed or expended during same calendar quarter (lobbying only): $ _____

INITIATED BY: J. Robert Fluor II

DATE CHECK REQUIRED ASAP DATE CHECK ISSUED 10-16-87

APPROVALS

JRFluor II _____ Notations or conditions to approval _____

Law _____

Tax _____

Treasurer _____

930409523340

STATEMENT OF DESIGNATION OF COUNSEL

BY FLUOR CORPORATION PUBLIC AFFAIRS COMMITTEE ("FLUOR PAC")
AND VICTOR L. PRECHTL, AS TREASURER

MUR _____

NAME OF COUNSEL: Chip Nielsen, Esq. and Lezlee Westine, Esq.
ADDRESS: Nielsen, Merksamer, Hodgson, Parrinello & Mueller
591 Redwood Highway, Suite 4000
Mill Valley, California 94941
TELEPHONE: (415) 389-6800

OR

NAME OF COUNSEL: Anne Marie Oldham, Esq.
ADDRESS: Fluor Corporation
3333 Michelson Drive, Suite 330I
Irvine, California 92730
TELEPHONE: (714) 975-6918

The above-named individuals are each hereby designated as my and Fluor PAC's counsel and are authorized to receive any notifications and other communications from the Commission and to act on my and Fluor PAC's behalf before the Commission.

December 11, 1991
Date

B L Prechtl
Signature

RESPONDENT'S NAME: Victor L. Prechtl
ADDRESS: Fluor Corporation
3333 Michelson Drive, Suite 330E
Irvine, California 92730
HOME PHONE: (714) 730-3664
BUSINESS PHONE: (714) 975-6737

AMO\PAC\COUNSEL.DSG

2304095234 1

HARLAND

EXHIBIT B

FLUOR PUBLIC AFFAIRS COMMITTEE

3333 MICHELSON DRIVE
IRVINE, CALIFORNIA 92730
TELEPHONE: (714) 975-2000

№ 001319

~~16-313~~
1220

10/16 1987

PAY TO THE ORDER OF BOB DOLE FOR PRESIDENT $ 2,000.00

TWO THOUSAND DOLLARS AND 00/100 XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX DOLLARS

CALIFORNIA CANADIAN BANK
1600 JAMBOREE BLVD. 714-752-6042
NEW PORT BEACH, CALIFORNIA 92660

"001319" ⑆122003134⑆005730308 3"

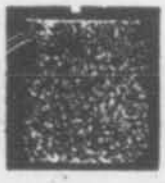
HARLAND 812

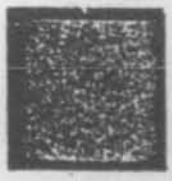
DETACH AND RETAIN THIS STATEMENT
THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW. IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT DESIRED

FLUOR PUBLIC AFFAIRS COMMITTEE

DATE	DESCRIPTION	AMOUNT
10/16/87	BOB DOLE FOR PRESIDENT 515 SOUTH FLOWER STREET LOS ANGELES, CA 90071 1988 GENERAL ELECTION. COMPLIANCE FUND CONTRIBUTION.	$2,000.00

930409523342





REPORT OF RECEIPTS AND DISBURSEMENTS

EXHIBIT C

For Other Than An Authorized Committee

(Summary Page)

USE FEC MAILING LABEL OR TYPE OR PRINT

1. NAME OF COMMITTEE (in full)
FLUOR CORPORATION - PUBLIC AFFAIRS COMMITTEE

ADDRESS (number and street) ☐ Check if different than previously reported
3333 Michelson Drive

2. FEC IDENTIFICATION NUMBER
C00034132

CITY, STATE and ZIP CODE
Irvine, CA 92730

3. ☐ This committee qualified as a multicandidate committee DURING THIS Reporting Period on _____ (date).

4. TYPE OF REPORT

(a) ☐ 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)
☐ Termination Report

Monthly Report Due On:
☐ February 20 ☐ June 20 ☐ October 20
☐ March 20 ☐ July 20 ☐ November 20
☐ April 20 ☐ August 20 ☐ December 20
☐ May 20 ☐ September 20 ☐ January 31

☐ 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 _____

(b) Is this Report an Amendment? ☐ YES ☒ NO

SUMMARY

5. Covering Period July 1, 1987 through December 31, 1987

		COLUMN A This Period	COLUMN B Calendar Year-to-Date
6. (a)	Cash on Hand January 1, 19 87		$ 25,751.70
(b)	Cash on Hand at Beginning of Reporting Period	$ 2,370.02	
(c)	Total Receipts (from Line 18)	$ 18,999.03	$ 34,584.35
(d)	Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	$ 21,369.05	$ 60,336.05
7.	Total Disbursements (from Line 28)	$ 20,775.00	$ 59,742.00
8.	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	$ 594.05	$ 594.05
9.	Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	$	
10.	Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or 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.

Type or Print Name of Treasurer
V. L. Prechtl

Signature of Treasurer
V L Prechtl

Date
1/28/88

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

FEC FORM 3X
(revised 4/87)

93040952343

EXHIBIT C

SCHEDULE B — ITEMIZED DISBURSEMENTS

Use separate schedule(s) for each category of the Detailed Summary Page

PAGE 2 OF 4

FOR LINE NUMBER 21

Any information copied from such Reports and 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.

NAME OF COMMITTEE (in Full)

FLUOR CORPORATION - PUBLIC AFFAIRS COMMITTEE

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Trent Lott For Congress Committee P.O. Box 1744 Gulfport, MS 39502	Trent Lott (R-MS-5) Disbursement for: [X] Primary [ ] General [ ] Other (specify) $1,000.00	10/8/87	$1,000.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Friends of Congressman Ben Blaz P.O. Box 4031 Agana, Guam 96910	Ben Blaz (R-Guam) Disbursement for: [X] Primary [ ] General [ ] Other (specify) $ 350.00	10/8/87	$ 350.00
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Ortiz for Congress Committee P.O. Box 75610 Washington, DC 20013	Solomon P. Ortiz (D-TX-27) Disbursement for: [X] Primary [ ] General [ ] Other (specify) $ 500.00	10/8/87	$ 500.00
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
DeLay Well Done P.O. Box 101 Sugar Land, TX 77487-0101	Thomas D. DeLay (R-TX-22) Disbursement for: [X] Primary [ ] General [ ] Other (specify) $ 500.00	10/16/87	$ 250.00
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Bob Dole for President 515 South Flower Street Los Angeles, CA 90071	Robert Dole - 1988 Presidential Campaign Disbursement for: [ ] Primary [X] General [ ] Other (specify) $2,000.00	10/16/87	$2,000.00 *
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
George Bush for President Committee P.O. Box 9394 Newport Beach, CA 92658-9394	George Bush - 1988 Presidential Campaign Disbursement for: [X] Primary [ ] General [ ] Other (specify) $2,000.00	11/18/87	$2,000.00
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Pete Wilson's Orange County Senator's Club P.O. Box 9394 Newport Beach, CA 92658-9394	Pete Wilson (R-CA) Disbursement for: [ ] Primary [X] General [ ] Other (specify) $4,000.00	11/23/87	$1,000.00
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Congressional Victory Fund P.O. Box 2884 Washington, DC 20013	California Democratic Delegation Disbursement for: [X] Primary [ ] General [ ] Other (specify) $ 250.00	11/23/87	$ 250.00
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Liz Patterson for Congress P.O. Box 2884 Washington, D C 20013	Elizabeth Patterson (D-SC-4) Disbursement for: [X] Primary [ ] General [ ] Other (specify) $ 550.00	11/23/87	$ 300.00

SUBTOTAL of Disbursements This Page (optional)	$7,650.00
TOTAL This Period (last page this line number only)	

* Earmarked for legal and accounting funds.

93U4095523444

File - MHC

RECEIVED
JAN 27 1988
Law Department

EXHIBIT D

DOLE
PRESIDENT
1828 L Street, N.W. • Suite 805
Washington, D.C. 20036
(202) 223-9400
(TDD) (202) 223-9400

RECEIVED
JAN 26 1988
J. Robert Fluor II

January 19, 1988

Fluor Public Affairs Committee
3333 Michelson Drive
Irvine, CA 92730

Dear Sirs:

Thank you for your past contributions to the Dole for President Committee. Unfortunately, we deposited check number 1319, which you earmarked for the Compliance Fund, into the general account. In order to correct this problem, we ask that you sign the detachment below so we will be able to transfer the money to the Compliance account. If you have any questions please call 1-800-262-3653, and ask for the Receipts Department.

Thank you for your support and cooperation.

Yours truly,

Scott Morgan
Dole for President Committee

Fluor Public Affairs Committee
3333 Michelson Drive
Irvine, CA 92730

This is to certify that $2000.00 of the contributions that have been made to the Dole for President Committee may be transferred to the "Legal and Accounting Compliance Fund."

Signature _____
(please do not print)

_____
(please do not print)

APPROVED
LWF
Law Dept.

Paid for by Dole for President Committee

93004095523345

LEROY C. TOMBS, JR.
8304 Oakland
Kansas City, Kansas 66011
(913) 334-6689

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
91 DEC 27 AM 10:59

December 18, 1991

John Warren McGarry, Chairman
Federal Election Commission
999 E Street
Washington, D.C. 20463

Re: Federal Election Commission vs. Leroy C. Tombs, Jr.
MUR 3309

9304095234 6

Dear Chairman McGarry:

This letter will serve to supplement my December 3, 1991 response to your November 21, 1991 correspondence alleging I made an excessive contribution to the Dole for President Committee.

Please be advised I recently located a Dole for President letter dated July 1, 1988 attaching a refund in the amount of $1,000.00. Enclosed please find a copy of said correspondence along with a copy of the check stub showing a refund in the amount of $1,000.00.

I feel this information is relevant to support my contentions. First, recall that my records reflect I did not contribute $2,350.00. Second, the letter along with the check stub shows that an additional $1,000.00 was refunded to me. Third, the letter further shows that the Dole for President Committee indicates I am within the Commission regulations limitations.

If I can be of any further assistance, please let me know. I look forward to your response.

Very truly yours,

Leroy C. Tombs, Jr.

LCT/bbk
Enclosures

cc: Jeffrey Long
Federal Election Commission

DOLE FOR PRESIDENT COMMITTEE, INC.

030146

OUR REF. NUMBER	YOUR INVOICE NUMBER	INVOICE DATE	INVOICE AMOUNT	AMOUNT PAID	DISCOUNT TAKEN	NET CHECK AMOUNT
000667	REFUND	05/30/88	1000.00	1000.00	0.00	1000.00

9504095234 7

DOLE
PRESIDENT

1828 L Street, N.W. • Suite 805
Washington, D.C. 20036
(202) 223-9400
(TDD) (202) 223-9400

July 1, 1988

Dear Contributor:

Your most recent contribution to the Dole Committee has been received and deposited.

However, because Federal Election Commission regulations limit the amount an individual may contribute to a political candidate to $1000.00, it is necessary for us to refund to you the $1000. that you are in excess of that limit.

Senator Dole appreciates your contribution to his campaign and hopes that he can count on your continued support of his future political efforts.

If you have any questions regarding the refunded money, please contact Nancy Roda at (703) 525-0085.

Yours Truly,

Nancy A. Roda

Dole for President
Committee

Enclosure

93040952348

Paid for by Dole for President Committee

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

91 DEC 23 PM 1:35

KATZ & PANTIRER
A PROFESSIONAL CORPORATION
COUNSELLORS AT LAW
1325 MORRIS AVENUE
P.O. BOX 685
UNION, NEW JERSEY 07083
(201) 688-5454

TELECOPIER (201) 688-8248

STEVEN W. KATZ*
LARRY PANTIRER
RICHARD J. BIRDOFF**
LAWRENCE P. BLENDEN

*ALSO MEMBER OF FLORIDA AND PENNSYLVANIA BARS

**ALSO MEMBER OF NEW YORK, FLORIDA AND GEORGIA BARS

MONMOUTH COUNTY
290 NORWOOD AVENUE
DEAL, NEW JERSEY 07723

REPLY TO UNION OFFICE

FILE NO

December 17, 1991

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

91 DEC 27 AM 10:59

Lawrence D. Parrish, Esq.
999 E Street Northwest
Room No. 657
Washington, DC 20463

RE: **Bertram Associates**
MUR 3309

Dear Mr. Parrish:

Please be advised that our office represents Bertram Associates. We are in receipt of your letter, dated November 21, 1991. We would appreciate it if you would send to us a copy of the check of Bertram Associates which was allegedly given to the Dole For President Committee.

Thank you very much.

Very truly yours,

STEVEN W. KATZ

SWK:cmi

cc: Bertram Associates

23040952349

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 8, 1992

Steven W. Katz, Esquire
Katz & Pantirer
1325 Morris Avenue
P.O. Box 685
Union, New Jersey 07083

Re: MUR 3309
Bertram Associates

Dear Mr. Katz:

This is in response to your letter dated December 17, 1991, which we received on December 27, 1991, requesting a copy of Bertram Associates' contribution check to the Dole for President Committee from which the Commission concluded their finding of reason to believe Bertram Associates violated 2 U.S.C. § 441b. Enclosed you will find a copy of the requested document for your review.

If you have any questions, please contact me at (202) 219-3400.

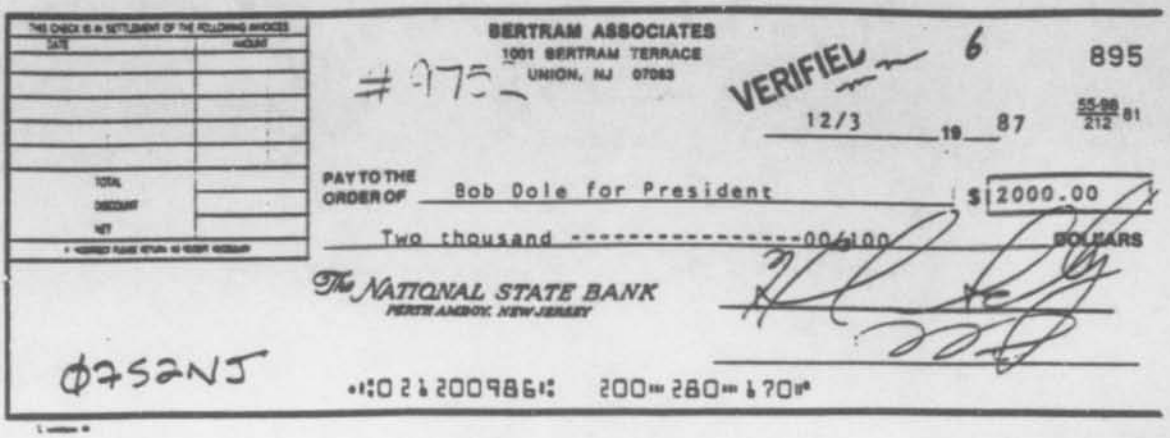
Sincerely,

Lawrence D. Parrish

Lawrence D. Parrish
Staff Attorney

Encl:

9304095235O



THIS CHECK IS IN SETTLEMENT OF THE FOLLOWING INVOICES

DATE	AMOUNT
TOTAL	
DISCOUNT	
NET	

BERTRAM ASSOCIATES
1001 BERTRAM TERRACE
UNION, NJ 07083

#975

VERIFIED 6

895

12/3 19 87

55-98/212 81

PAY TO THE ORDER OF Bob Dole for President $ 2000.00

Two thousand ----------00/100 DOLLARS

The NATIONAL STATE BANK
PERTH AMBOY, NEW JERSEY

Ø752NJ

⑆021200986⑆ 200 280 670

23

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

91 DEC 26 AM 10:15

LAW OFFICES

OBERMAYER, REBMANN, MAXWELL & HIPPEL

14TH FLOOR PACKARD BUILDING

S.E. CORNER 15TH AND CHESTNUT STREETS

PHILADELPHIA, PA. 19102

(215) 665-3000

TELECOPIER 215-569-1586

TWX 7:085700392

December 18, 1991

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

91 DEC 27 PM 5:56

Federal Election Commission
Office of General Counsel
Washington, D.C. 20463

Re: Your File MUR 3309
Obermayer, Rebmann, Maxwell & Hippel

Dear Sir or Madam:

We are in receipt of a letter from John Warren McGarry, Chairman of the Federal Election Commission, dated December 5, 1991, which states that there is reason to believe that we may have violated the Federal Election Campaign Act of 1971, as amended, by virtue of having made a contribution of $5,000 to the Dole for President Committee in violation of 2 U.S.C. §441a(a)(1)(A).

This assertion is based on an apparent typographical error. Our firm made only one contribution to the Dole for President Committee in the amount of $1,000, which is in compliance with the Act. A copy of such check is enclosed.

We would therefore appreciate your advising us, after your further review and verification, that this matter has been closed. If, however, you believe after such further review that your assertion is accurate, we would request the opportunity to examine the applicable records in order to ascertain the basis for your conclusion that we contributed $5,000 so that we may respond to this assertion appropriately.

Very truly yours,

Obermayer, Rebmann, Maxwell &
Hippel

By: _____

DSB:29459.1

9304095223352

OBERMAYER, REBMANN, MAXWELL & HIPPEL
ATTORNEYS AT LAW
PACKARD BLDG. • PHILADELPHIA, PA. 19102

14 45953 3-2/310

June 23, 19 87

PAY TO THE ORDER OF Dole for President $1,000 00/100

EXACTLY 1,0[illegible]

07 RM DC

FIRST PENNSYLVANIA BANK
PHILADELPHIA, PA.

OBERMAYER, REBMANN, MAXWELL & HIPPEL
202282078

⑈0 3 1 0 0 0 0 2 4⑈ ⑆6 9 1⑆ 3 1 2⑆ 3⑈ ⑈0000 100000⑈

930409523 53

P.E.G. SIGNET BANK/

09-07-01-87 0279

DOLE FOR PRESIDENT COMMITTEE
652-0024719
FOR DEPOSIT ONLY
CONTRIBUTION
THANK YOU FOR YOUR

PAY ANY BANK, P.E.G.
SIGNET BANK/VIRGINIA

056004089

930409523554

MUR 3942

KENNEDY COVINGTON LOBDELL & HICKMAN

ATTORNEYS AT LAW
3300 NCNB PLAZA
CHARLOTTE, NORTH CAROLINA 28280-8082
TELEPHONE 704/377-6000

SOUTH CAROLINA OFFICE
THE GUARDIAN BUILDING
ONE LAW PLACE-SUITE 301
P. O. BOX 11429
ROCK HILL, S.C. 29731-1429
TELEPHONE 803/327-6171

FACSIMILES
CHARLOTTE 704/331-7598
ROCK HILL 803/324-4737

WRITER'S DIRECT DIAL NUMBER
704/331-7452

MARCUS T. HICKMAN
CLARENCE W. WALKER
JAMES E. (BILL) WALKER
HENRY C. LOMAX
EDGAR LOVE III
CHARLES V. TOMPKINS, JR.
GLEN B. HARDYMON
J. DONNELL LASSITER
ROSS J. SMYTH
A. ZACHARY SMITH III
WILLIAM F. DREW, JR.
CHARLES O. DuBOSE
RALEIGH A. SHOEMAKER
JOHN M. MURCHISON, JR.
STEPHEN M. S. COURTLAND
RICHARD D. STEPHENS
F. FINCHER JARRELL
MAYNARD E. TIPPS
WAYNE P. HUCKEL
J. NORFLEET PRUDEN III
WILLIAM C. LIVINGSTON
LEE WEST MOVIUS

JOSEPH B. C. KLUTTZ
JONATHAN A. BARRETT
EUGENE C. PRIDGEN
STEPHEN K. RHYNE
E. ALLEN PRICHARD
RAYMOND E. OWENS, JR.
HENRY W. FLINT
DAVID H. JONES
NANCY BLACK NORELLI
JAMES C. HARDIN III*
PETER McLEAN III
MYLES E. STANDISH
KIRAN H. MEHTA
MICHAEL S. HAWLEY
JAMES P. COONEY III
CAROL NASH NORMAN*
BRIAN P. EVANS
JEFFERSON W. BROWN
LYNN OLIVER WENIGE
GEORGE C. COVINGTON*
DANIEL L. JOHNSON, JR.

WALTER D. FISHER, JR.*
LISA HYMAN LANE*
ALICE CARMICHAEL RICHEY
DENNARD LINDSEY TEAGUE
DEAN A. WARREN
STEPHEN R. McCRAE, JR.**
H. WILLIAM PALMER, JR.
JOHN H. CULVER III
BOBBY D. HINSON*
WILLIAM B. KIRK, JR.
MICHELLE C. LANDERS
W. HENRY SIPE III**
BEVERLY A. CARROLL**
LESLEE K. DAUGHERTY
LEROY P. HUTCHINSON
BRIAN C. REEVE
RANDALL W. LEE
MARK E. SWOFFORD**
WILLIAM N. HARRIS
ALLISON R. BARNHILL
BARBARA R. FRITH
J. ANDRE HALL

A. LEE HOGEWOOD III
CORY HOHNBAUM
C. CORLEY HOLT
FELICIA A. WASHINGTON
DAVID W. BROWN, JR.
JAMES E. EARLE
KENNETH L. FREDERICK**
CLIFFORD R. JARRETT
CAROL A. JONES VAN BUREN

FRANK H. KENNEDY
1893-1975
HUGH L. LOBDELL
1908-1982

OF COUNSEL
W. T. COVINGTON, JR.
DAVID GRIER MARTIN, JR.

SPECIAL COUNSEL
THOMAS R. PAYNE
ROBERT R. CARPENTER**

EXCEPT AS NOTED ATTORNEYS ADMITTED IN N.C. ONLY
*ADMITTED IN N.C. AND S.C.
**ADMITTED IN S.C. ONLY

December 26, 1991

Federal Election Commission
Washington, DC 20463

Attention: Mr. Lawrence D. Parrish
General Counsel's Office

Re: MUR 3309 Becon Construction Company

Dear Mr. Parrish:

We represent Becon Construction Company in connection with the above referenced matter.

I have received from client a copy of the letter of the Federal Election Commission dated November 21, 1991, addressed to J. M. Komes, President, Becon Construction Company, Inc., Southeast Headquarters, Charlotte, North Carolina, together with Federal Election Commission Factual and Legal Analysis with respect to the above referenced matter.

Apparently, this correspondence was received by client in San Francisco on either December 12 or December 13 and a copy was faxed to the undersigned on December 13, 1991.

Upon receipt of the correspondence with respect to this matter, I immediately retrieved my file on this matter from storage and have tried on at least three (3) occasions to reach you by telephone, the first time being December 17. I need more information before I can respond to this matter. To be specific, I need the date, trip (including city of departure, each city of destination, etc.), as well as the dollar amount of each trip. It would also be helpful to know the name of the individual or individuals who was (were) the passenger(s) for each specific trip.

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM
91 DEC 30 AM 9:19

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
92 JAN -2 AM 10:42

23040952355

I also note that the Factual and Legal Analysis states that "DPC used private aircraft owned by Becon Construction Company, Inc. for campaign related travel." I do not believe that this is correct, however, it may well be the DPC was incorrectly billed through Becon Construction Company, Inc. However, I will investigate this fact further.

For the reasons hereinabove given, we will need additional time to respond to the alleged violation.

If you have any questions with respect to the requested information or requested additional time to answer, I would greatly appreciate your calling me at the above number.

Very truly yours,

Marcus T. Hickman
For the Firm

MTH:ekl

7304095523356

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 8, 1992

Marcus T. Hickman, Esquire
Kennedy Covington Lobdell
& Hickman
3300 NCNB Plaza
Charlotte, NC 28280-6000

Re: MUR 3309
Becon Construction Company

Dear Mr. Hickman:

This is in response to your letter dated December 26, 1991, which we received on December 30, 1991, requesting an extension until January 17, 1992 to respond to the Commission's finding. 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 January 17, 1992.

Per our conversation, via telephone, I have enclosed copies of the requested documents for your review.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Lawrence D. Parrish

Lawrence D. Parrish
Staff Attorney

Encl:

2304095523357

DOLE FOR PRESIDENT COMMITTEE, INC.

Gary Bechtel

DELUXE - FORM WVO-3 V-2

DATE	DESCRIPTION	AMOUNT
4-7	travel for E. Dole 7100-000-600	$7,512.85
	Marcus Hitchman	

DOLE FOR PRESIDENT COMMITTEE, INC.
1828 L STREET, N.W., SUITE 805
WASHINGTON, D.C. 20036

SIGNET BANK
Vienna, VA Virginia

5596

7 April 88

68-408/560 405

PAY Seven Thousand Five Hundred Twelve and 85/100 DOLLARS $ 7,512.85

TO THE ORDER OF
Gary Bechtel
4651 Charlotte Park Drive
Building One Suite 280
Charlotte, NC 28217

ENTERED

NOT NEGOTIABLE

"00005596" :056004089: 652-00246691

REQUESTED BY: Scott Mayfield DIVISION DIR:

COUNSEL: SM

COMPTROLLER:

DIR OF ADMIN:

DPTY CHAIRMAN:

A/P CODE: 4541

G/L CODE: 7100-000-600

ENTERED 2979

✓ GIVE CHECK TO R 2,475.00

____ MAIL CHECK

____ OTHER

2 (a) (1)

DOLE FOR PRESIDENT

REQUEST FOR EXPENDITURE

PLEASE MAKE CHECK PAYABLE TO: Mr. Tony Bechtel
Bruno Construction Company, Inc.

ADDRESS: 4651 Charlotte Park Drive
Building One - Suite 200
Charlotte, NC 28217

IN THE AMOUNT OF: $ 7,512.85 CHECK NEEDED BY: 6/7 (date)

PURPOSE: Travel for Secretary Dole, please see attached.

DATE: 6/7 APPROVED BY:

REQUESTED BY: Scott Morgan DIVISION DIR:

COUNSEL: SM

COMPTROLLER:

DIR OF ADMIN:

A/P CODE: 4544 DPTY CHAIRMAN:

G/L CODE: 7100-000-600

ENTERED 2791

✓ GIVE CHECK TO R

MAIL CHECK

OTHER

(2) (a) (2)

930409523559

DOLE
PRESIDENT
1828 L Street, N.W. • Suite 805
Washington, D.C. 20036
(202) 223-9400
(TDD) (202) 223-9400

March 29, 1988

MEMO TO: Scott/Jenny

FROM: Christy

RE: Charter Aircraft from Gary Bechtel

Attached are the bills from the aircraft we chartered from Gary Bechtel. As I mentioned to Scott, I spoke with Gary's assistant, Peggy Luerssen, who explained that Mr. Bechtel charters this aircraft from the corporation on a monthly rate. At this time, Mr. Bechtel has paid with his personal funds $9,987.85 for use of the aircraft. The amount represents charter airfare for Elizabeth Dole (approximately 1,600), Robin Dole, General Haig, and DTT staff members. However, there is a portion of this amount ($2,475.00) which represents the airfare for Carolyn Bechtel and Susan Thigpen to distribute voter cards on Super Tuesday. I am not aware that this amount was authorized- possibly Judy Harbaugh or Jerry Blackwelder can clear this up.

One final thing- Peggy did mention that no portion of this amount has been paid according to her records. (I mentioned to you that I thought some of Mrs. Dole's airfare had been paid). In addition, as I previously told you, Marianne Means a reporter- did ride on the aircraft for the Ashville, NC - Ashboro- Greensboro portion which I submitted to Susan. Let me know if you have any questions regarding this billing.

thanks!

Paid for by Dole for President Committee

(2) (a) (3)

93040952360

becon CONSTRUCTION COMPANY, INC.

Southeast Headquarters
4661 CharlottePark Drive • Building One – Suite 200 • Charlotte, N.C. 28210 • 529-3000

March 22, 1988

Mr. Christopher T. Cushing
Director of Finance Committee
Dole for President Committee
1828 L. Street, N.W., Suite 805
Washington, DC 20036

Dear Mr. Cushing:

As a follow-up to your conversation with Mr. Gary Bechtel in Washington on March 21, 1988, please find attached copies of unpaid aircraft charges that have been previously mailed to Kristy Varney.

These invoices now total $7,512.85 and some are more than 90 days past due. $9,987.85

I would appreciate any prompt attention you could give these aircraft bills to bring payments up to date. Please make the check payable to Mr. Gary Bechtel, as I have already paid these bills from his personal business account.

Charlotte to Charleston Voter Cards

If you have any questions, please call me.

Very truly yours,

Peggy Luerssen
Staff Assistant

Attachments

9,987.85
7,512.85
2,475.00

(2) (a) .(4)

9304095236 1

becon CONSTRUCTION COMPANY, INC.

4651 CharlottePark Drive • Building One — Suite 200 • Charlotte, N.C. 28210 • 704/523-2942

January 5, 1988

Ms. Kristy Varney
Dole Campaign Committee
1828 L Street N.W.
Suite 805
Washington, DC 20036

Dear Ms. Varney:

As per our conversation today, enclosed is the aircraft billing for two trips in December.

Please make the check payable to Mr. Gary Bechtel and send it to the address above. This aircraft bill has been paid by Mr. Bechtel.

If you have any questions or need additional information please feel free to contact me.

Very truly yours,

Peggy Luerssen
Staff Assistant

Enclosure

9304092523562

Smilin' Jack Ltd.

P. O. Box 2985, Charlotte, N.C. 28211

January 5, 1988

Ms. Kristy Varney
Dole Campaign Committee
1828 L Street N.W.
Suite 805
Washington, DC 20036

Dear Ms. Varney:

INVOICE

Aircraft charges for the following trips:

12/3/87	*Ashville, North Carolina to Ashboro, North Carolina to Greensboro, North Carolina.*	*$ 500.00*
	(Mrs. Dole)	
12/12/87	*Raleigh, North Carolina to Washington, DC and return to Raleigh, North Carolina*	*$1,000.00*
	(Robin Dole, Kristy Varney, and Bill Lacy)	
	TOTAL AMOUNT DUE:	*$1,500.00*

9304095523663

(6)

Smilin' Jack Ltd.

P. O. Box 2985, Charlotte, N.C. 28211

January 20, 1988

Ms. Kristy Varney
Dole Campaign Committee
1828 L. Street N.W.
Suite 805
Washington, DC 20036

INVOICE

Dear Kristy:

OK'd

Aircraft charges for January 18, 1988:

Hickory, NC to Fayetteville, NC to Winston-Salem, NC	1.2 Hours	$540.00

(Mrs. Elizabeth Dole-passenger)

Please remit payment made payable to :

Mr. Gary Bechtel
4651 CharlottePark Drive, Suite 200
Charlotte, NC 28217

Very truly yours,

Peggy Luerssen
Staff Assistant

(7)

23040955236 4

becon CONSTRUCTION COMPANY, INC.

4651 CharlottePark Drive • Building One — Suite 200 • Charlotte, N.C. 28210 • 704/523-2942

February 29, 1988

Ms. Kristy Varney
Dole Campaign Committee
1828 L. Street N.W.
Suite 805
Washington, DC 20036

Dear Ms. Varney:

INVOICE

Reimbursement of aircraft charges for February 25,26,27, 1988 for Ms. Robin Dole:

Charlotte, NC to Macon, GA to Fort Lauderdale, FL to Washington, DC plane return Charlotte, NC	7.3 hours x $450.00 = $3,285.00
Crew Expenses	$632.85
Total Amount Due this Trip:	$3,917.85
Past Due Invoices:	
12/03/87	$500.00
12/12/87	$1,000.00
01/08/88	$540.00
	$2,040.00
GRAND TOTAL DUE UPON RECEIPT:	$5,957.85

Very truly yours,

Peggy Luerssen
Staff Assistant

9304095523365

becon CONSTRUCTION COMPANY, INC.

Southeast Headquarters
4651 Charlotte Park Drive • Building One – Suite 200 • Charlotte, N.C. 28210 • 529-3000

March 22, 1988

Ms. Kristy Varney
Dole Campaign Committee
1828 L Street N.W.
Suite 805
Washington, DC 20036

Dear Kristy:

INVOICE

Aircraft charges for the following trips in March, 1988:

3/5/88	Charlotte to Greenville, NC to Washington, DC and return to Charlotte, NC (passenger: Alexander Haig)	$1,305.00	2.9 hours
3/08/88	Greensboro, NC to Salisbury, NC to Greensboro	$ 250.00	.5 hour
	Total Due	$1,555.00	

Very truly yours,

Peggy Luerssen
Staff Assistant

23040952366

7

VOR: 008566 CHECK NO. 018720

E NO.	YOUR INV. NO.	INVOICE DATE	INVOICE AMOUNT	AMOUNT PAID	DISCOUNT TAKEN	NET CHECK AMOUNT
19596	00019596	02/25/88	1,500.00	1,500.00	.00	1,500.00
					CHECK TOTAL	1,500.00

CHECK NO	CHECK DATE	VENDOR NO
18720	04/01/88	008566

DOLE FOR PRESIDENT COMMITTEE, INC.
1828 L STREET, NW
SUITE 805
WASHINGTON, DC 20036

CHECK NO. 018720

56-408-405
660

SIGNET BANK
VIRGINIA

ONE THOUSAND FIVE HUNDRED AND 00/100 DOLLARS

CHECK AMOUNT
******1,500.00

PAY TO THE ORDER OF
Gary Sechtel
Becon Const. Co Bldg.1
Suite 200, 4651 Charlotte Park
Charlotte NC 28210

NON-NEGOTIABLE

Louis L Hays

⑈018720⑈ ⑆056004089⑆ 652⑈00246⑈

REQUESTED BY: Per Susan Sheridan

COUNSEL: _____

COMPTROLLER: _____

DIR OF ADMIN: _____

DPTY CHAIRMAN: _____

ENTERED 19596

A/P CODE: 4544

G/L CODE: 7100-000-600

GIVE CHECK TO _____

X MAIL CHECK

_____ OTHER _____

(2) (b)

DOLE FOR PRESIDENT

REQUEST FOR EXPENDITURE

RECEIVED
FEB 26 1988

PLEASE MAKE CHECK PAYABLE TO: Mr. Gary Bechtel

ADDRESS: Becon Construction Company, Inc.
4651 Charlotte Park Drive
Building One, Suite 200
Charlotte, N.C. 28210

IN THE AMOUNT OF: $1,500.00

CHECK NEEDED BY: 2/26/88 (date)

PURPOSE: reimburse for aircraft charges for North Carolina campaign trip 12/3 - 12/12 1987.

DATE: 2/25/88

REQUESTED BY: Kathy Foreman
per Susan Sheridan

APPROVED BY:

DIVISION DIR:

COUNSEL:

COMPTROLLER:

DIR OF ADMIN:

DPTY CHAIRMAN:

A/P CODE: 4544

ENTERED 19596

G/L CODE: 7100-000-600

X GIVE CHECK TO

MAIL CHECK

OTHER

93U4095523368

DECON CONSTRUCTION COMPANY, INC.
Building One — Suite 200 • Charlotte, N.C. 28210 • 704/523-2942

551-6520

[redacted]ry 5, 1988

Ms. Kristy Varney
Dole Campaign Committee
1828 L Street N.W.
Suite 805
Washington, DC 20036

Dear Ms. Varney:

As per our conversation today, enclosed is the aircraft billing for two trips in December.

Please make the check payable to Mr. Gary Bechtel and send it to the address above. This aircraft bill has been paid by Mr. Bechtel.

If you have any questions or need additional information please feel free to contact me.

Very truly yours,

Peggy Luerssen
Staff Assistant

Enclosure

930409523569

Millin' Jack Ltd. P. O. Box 2985, Charlotte, N.C. 28211

January 5, 1988

Ms. Kristy Varney
Dole Campaign Committee
1828 L Street N.W.
Suite 805
Washington, DC 20036

Dear Ms. Varney:

INVOICE

Aircraft charges for the following trips:

12/3/87	Ashville, North Carolina to Ashboro, North Carolina to Greensboro, North Carolina. (Mrs. Dole) - staff + Marianne + Lacy.	$ 500.00
12/12/87	Raleigh, North Carolina to Washington, DC and return to Raleigh, North Carolina (Robin Dole, Kristy Varney, and Bill Lacy)	$1,000.00
	TOTAL AMOUNT DUE:	$1,500.00

23040952370

MUR 3309

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

92 JAN -2 AM 10:41

AIKEN, ST. LOUIS & SILJEG, P.S.
ATTORNEYS AT LAW
1215 NORTON BUILDING
801 SECOND AVENUE
SEATTLE, WASHINGTON 98104
FACSIMILE 206-623-5764
TELEPHONE 206-624-2650

ROBERT ST. LOUIS
CHARLES E. SILJEG
ARTHUR H. McKEAN
GEORGE S. MARTIN
DOUGLAS W. McQUAID
WALLACE E. SKIDMORE, JR.
STEVEN SOHA
WILLIAM A. OLSON
THOMAS J. LUCAS

JAMES R. WOEPPEL
R. LIND STAPLEY
GREGORY L. URSICH

OF COUNSEL
MARTIN J. DURKAN
PAMELA A. LANG

RETIRED
WALLACE AIKEN

December 27, 1991

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Jeffrey Long
Federal Election Commission
Washington, D.C. 20463

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
92 JAN -3 AM 10:39

Re: Matthew M. Clapp, Jr.
Your Re: MUR 3309

Dear Mr. Long:

I previously wrote to you on December 4, 1991, and included a designation of counsel. Copies of both are attached. My letter confirmed our request for an extension of time in which to respond to a notice sent to our client, Matthew M. Clapp, Jr.

The notice sent to Mr. Clapp states that he made a contribution to the Dole for President Commission "that aggregated $4,000 . . . ." Since this exceeded the $1,000 limitation, the notice indicates reason to believe a violation of 2 U.S.C. §441a(a)(1)(A).

Our client acknowledges that he did in fact make a contribution to that campaign in excess of $1,000. His records indicate that the actual contribution was for $5,000. Although our client recalls a refund of some $4,000 having been made by the Dole Committee, he has, despite an attempt to resurrect his 1987-88 records, been unable to verify that repayment. Similarly, we have no proof that the refund was made within the required time.

Although acknowledging that the contribution was made, we request, on behalf of our client, that no action be taken by the Federal Election Commission (the "Commission"). We have three reasons for this request.

First, as the members of the Commission recognize, the current laws regarding campaign contributions can be somewhat confusing. For example, while there is a $1,000 limitation on contributions to a candidate, $5,000 can be contributed to other political committees in a calendar year. And, there is a $20,000

9304095237 1

limitation on contributions to political committees established by national political parties. Frankly, our client was unaware of the campaign limitations. Had he known, he would not have exceeded the permissible limits. He did not have that information, however, and to his knowledge, the materials supplied by the candidate were also silent on limits.

Secondly, if our client's recollection is in fact correct, $4,000 was returned to him. Although not timely, and while written proof is unavailable, the refund is a showing that the permitted contribution amount was not exceeded. Thus, to the extent that the legislation is intended to keep candidates on an equal footing, that goal was met.

Finally, the goal of ensuring that our particular client will not make excessive contributions in the future is certain. We can definitely assure you that our client is most concerned about this matter, and he wishes to do whatever is necessary to both clear his name and demonstrate his respect for the law.

Although your notice does not indicate it, our client has indicated that he also made a $5,000 contribution to the General Alexander Haig presidential campaign at the same time that he made the contribution to the Dole campaign. Again, Mr. Clapp was unaware of the limits at that time, and he is unsure if any portion of that amount was refunded. There is no showing from his records that a refund was received.

While this check indicates that a second contribution was made in error, I think it also more realistically indicates that Mr. Clapp did not know what the limitations were; and, he had no intent to specially benefit any one candidate. Nevertheless, in a spirit of candidness, and as an indication to the Commission of his sincerity, he has asked that we inform you of that payment. As with the Dole matter, we request a dismissal of any future action that might be claimed regarding that contribution.

Because there was no knowing intent to avoid the law, since our client believes that the excess contribution was returned to him, and because there is a more than adequate showing that the law will not be violated again, we request, in accordance with CFR Section 111.6, that the Commission take no further action on the present claim against Mr. Clapp, and no future action on his contribution to the Haig campaign.

9304095237 2

We further request that no additional findings be made, other than dismissal of the complaint. Should the Commission deny our request that it take no further action, other than dismissal, then we wish to enter into conciliation with the Commission under CFR Section 111.18.

We look forward to your response to our request. In the meantime, if we can provide any further information to assist you, we would appreciate that opportunity.

Very truly yours,

AIKEN, ST. LOUIS & SILJEG, P.S.

Thomas J. Lucas

Thomas J. Lucas

TJL:bjd
Enclosures
cc: Mr. M. Clapp, Jr.

clapma/1226long
5103-0 (001)

23040952373

AIKEN, ST. LOUIS & SILJEG, P.S.
ATTORNEYS AT LAW
215 NORTON BUILDING
801 SECOND AVENUE
SEATTLE, WASHINGTON 98104
FACSIMILE 206-623-5764
TELEPHONE 206-624-2650

ROBERT ST LOUIS
CHARLES E SILJEG
ARTHUR H McKEAN
GEORGE S MARTIN
DOUGLAS W McQUAID
WALLACE E SKIDMORE JR
STEVEN SOHA

WILLIAM A OLSON
THOMAS J LUCAS
JAMES R WOEPPEL
R LIND STAPLEY

OF COUNSEL
MARTIN J DURKAN

RETIRED
WALLACE AIKEN

December 4, 1991

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Jeffrey Long
Federal Election Commission
Washington, D.C. 20463

Re: Matthew M. Clapp, Jr.
Your Re: MUR 3309

Dear Mr. Long:

I spoke with Mr. George Rishel today regarding the above matter. Mr. Rishel informed me that you were in Montana and requested that I write to you regarding the purpose of my call.

A letter dated November 21, 1991, was sent to Mr. Clapp. He received it on or about November 25. A response is due on or about December 10. Because I will be out of town, and since Mr. Clapp is attempting to obtain financial information pertinent to this matter, this is to request that we have until January 2, 1992, in which to respond to your inquiry letter.

Please accept this letter as our formal request for an extension. If anything further is required, please contact my office. Although I will be out of the country until December 15, 1991, I will be back on Monday, December 16. I thank you in advance for your assistance and consideration of this matter. I have also attached a Statement of Designation of Counsel appointing this firm and myself, which has been signed by Mr. Clapp.

Very truly yours,

AIKEN, ST. LOUIS & SILJEG, P.S.

Thomas J. Lucas

Thomas J. Lucas

TJL:bjd
Enclosure
cc: Mr. M. Clapp, Jr.
Ms. S. Kelley

clapma/1204long

9304095237 4

STATEMENT OF DESIGNATION OF COUNSEL

MUR 3309

NAME OF COUNSEL: Thomas J. Lucas

ADDRESS: Aiken, St. Louis & Siljeg, P.S.
1215 Norton Building
801 Second Avenue
Seattle, WA 98104

TELEPHONE: (206) 624-2650

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.

Dec. 4, 1991
Date

Matthew N. Clapp Jr.
Signature

RESPONDENT'S NAME: Matthew N. Clapp, Jr.

ADDRESS: 720 Olive Way
Seattle, WA 98101

HOME PHONE:

BUSINESS PHONE: 623-6634

2304095523375

P 165 767 527

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

Sent to Jeffrey Long.	
Street and No. Fed. Election Commission	
P.O., State and ZIP Code Wash DC 20463	
Postage	$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to whom and Date Delivered	
Return receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	$
Postmark or Date 12-4-91	

* U.S.G.P.O. 1984-446-014

PS Form 3800, Feb. 1982

P 165 767 527

SENDER:
- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt Fee will provide you the signature of the person delivered to and the date of delivery.

I also wish to receive the following services (for an extra fee):
1. ☐ Addressee's Address
2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
Jeffrey Long
Federal Election Comm.
Washington DC 20463

4a. Article Number P165 767 527

4b. Service Type
☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail ☐ Return Receipt for Merchandise

7. Date of Delivery

5. Signature (Addressee)

6. Signature (Agent)

8. Addressee's Address (Only if requested and fee is paid)

PS Form 3811, November 1990 * U.S. GPO: 1991—287-066 DOMESTIC RETURN RECEIPT

9 3 0 4 0 9 5 2 3 7 6

MUR 3963

LAW OFFICES

JENNER & BLOCK

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

601 THIRTEENTH STREET, N. W.
TWELFTH FLOOR
WASHINGTON, D. C. 20005

(202) 639-6000
(202) 639-6066 FAX

DIRECT DIAL NUMBER:

JONATHAN B. SALLET

CHICAGO OFFICE
ONE IBM PLAZA
CHICAGO, IL 60611
(312) 222-9350
(312) 527-0484 FAX

MIAMI OFFICE
ONE BISCAYNE TOWER
MIAMI, FL 33131
(305) 530-3535
(305) 530-0006 FAX

LAKE FOREST OFFICE
ONE WESTMINSTER PLACE
LAKE FOREST, IL 60045
(708) 295-9200
(708) 295-7810 FAX

January 3, 1992

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
92 JAN -3 PM 12:26

2304095237 7

Lawrence D. Parrish, Esq.
Office of the General Counsel
Federal Election Commission
Washington, D.C. 20463

Re: MUR 3309

Dear Mr. Parrish:

Pursuant to 11 C.F.R. 111.18(d), the respondent Long Lines Limited requests pre-probable cause conciliation of MUR 3309.

The documents supplied to us by the FEC show that on one occasion in late 1987 the Dole-for-President campaign paid for the use of aircraft owned by the respondent after the flights had occurred. As the FEC Factual and Legal Analysis states, the flights in question took place on December 23 and 24, 1987, and payment was sent on December 31, 1987. A letter sent to Long Lines Limited by the Dole campaign counsel stated that the payment was being made "according to Federal Election Commission regulations."[1/] As noted above, payment was not made prior to the flights as required by 11 C.F.R. § 114.9(e). The respondent does not assert that it was licensed to offer commercial services for travel.

Because the respondent has no reason to doubt the factual and legal analysis relied upon by the FEC, the respondent requests pre-probable cause conciliation.

1/ The letter from the campaign counsel bears the date December 31, 1988, but accompanying documents show that the actual date of the letter was December 31, 1987, the date on which the check to the respondent is dated.

For the following reasons, the Commission should enter into negotiations directed towards reaching a conciliation agreement. First, the respondent has no prior history of any FEC violations. Second, as a practical matter, the respondent relied upon the Dole campaign to assure that federal election procedures were being followed. Indeed, the letter from the Dole campaign counsel represented that the charter payment in question was being made "according to" FEC regulations. Although the respondent fully recognizes its responsibility for ensuring its own compliance with FEC regulations, the practical circumstances here led the respondent to err inadvertently in this single instance. Third, the respondent will take appropriate measures to ensure that FEC violations do not occur in the future. Fourth, although the regulation was violated, the violation was minor. The sum in controversy was relatively small and payment was sent by the Dole campaign within a week of the time that the flights occurred. Indeed, had the Dole campaign used another method of transport, the payment would clearly have been made within a "commercially reasonable time." See 11 C.F.R. 114.9(e)(2).

For these reasons, the respondent respectfully requests initiation of a conciliation process.

Sincerely,

Jonathan B. Sallet

2304095237 8

MUR 3975

VIA MESSENGER

Mrs. Lydia F. Fried
#6 Vendome Court
Bethesda, MD 20817

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
92 JAN -6 PM 2:00

January 6, 1992

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

Re: MUR 3309
Lydia Fried

Dear Mr. Long:

Based on the information which you sent me, I have ascertained that of the $5,000 which was mistakenly contributed, $3,000 was returned to me by the Dole Committee. The remaining $2,000 was a joint contribution written on a joint checking account and was intended as a joint contribution. A copy of this joint account check will be furnished at your request.

To the best of my knowledge, the Dole for President Exploratory Committee, Inc., did not send me a reattribution letter, or if it was sent, I do not remember receiving same. However, the remaining $2,000 that was contributed after the refund, should be attributed to my husband, Michael S. Fried, and to me, Lydia F. Fried. See Records of contributions and refund attached hereto.

Hope this additional information will be sufficient and you will find that no violation has occurred. If there is anything further I need to do with reference to your letter, I will be glad to give you my full cooperation. Thank you for your assistance in the above matter.

Very truly yours,

Lydia Fried/by MF

Lydia Fried

LFF:kc
Enclosures as stated
cc:file
MF:JLongFEC.LFF

93040952379

SCHEDULE B-P — ITEMIZED DISBURSEMENTS

NAME OF COMMITTEE
[illegible] Committee, Inc.

[illegible] copied from such reports and 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.

NAME, ADDRESS, CITY, STATE, ZIP	PURPOSE OF DISBURSEMENT	DATE (MONTH, DAY, YEAR)	AMOUNT OF EACH DISBURSEMENT THIS PERIOD
[illegible] Adams [illegible] Holliday Street [illegible] City AS 65523	Contribution Refund DISBURSEMENT FOR: PRIMARY	12/04/87	550.00
[illegible] Truman Gline, Jr. [illegible] Washington Street [illegible] CT 06101	Contribution Refund DISBURSEMENT FOR: PRIMARY	[illegible]	[illegible]
Myrtle Mo[illegible] [illegible] Carolina [illegible] SC 29501	Contribution Refund DISBURSEMENT FOR: PRIMARY	12/21/87	100.00
Linda Fried 16 Vendome Ct. Bethesda [illegible] MD 20817	Contribution Refund DISBURSEMENT FOR: PRIMARY	12/04/87	3000.00
[illegible] S. Reymond [illegible] East Scenic Road [illegible]ngfield PA 19064	Contribution Refund DISBURSEMENT FOR: PRIMARY	12/21/87	130.50
Ruth S. [illegible] Fried 15 Sunset Bay Ocean Road Key Largo FL 33037	Contribution Refund DISBURSEMENT FOR: PRIMARY	12/21/87	525.00
Stephen Ehrlich 57-A Hospital Street [illegible]chusetts CT 06231	Contribution Refund DISBURSEMENT FOR: PRIMARY	12/21/87	500.00
SUBTOTAL OF DISBURSEMENTS THIS PAGE (optional)			3,691.50
TOTAL THIS PERIOD (last page this line number only)			

93040952380

SCHEDULE A-P ITEMIZED RECEIPTS PAGE 134 OF 153
NAME OF COMMITTEE (IN FULL) CONTINUATION COVER LINE NUMBER 17A
PERIOD FROM 07/01/87 THRU 09/30/87

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.

NAME, ADDRESS, CITY, STATE, ZIP	EMPLOYER AND OCCUPATION	RECEIPT INFO DATE	RECEIPT INFO AMOUNT
FRIED, MRS. CAROLYN G. 292 HARBOR DRIVE LIDO BEACH NY 11561	INFORMATION REQUESTED	08/19/87	500.00
(X)PRI ( )GEN ( )OTHER:	AGGREGATE YTD 500.00		
FRIED, MRS LYDIA 6 VENDOME CT BETHESDA MD 20817	SELF EMPLOYED BUILDER	07/27/87 09/22/87	1,000.00 2,000.00
(X)PRI ( )GEN ( )OTHER:	AGGREGATE YTD 3,000.00*		
FRIED, MR MICHAEL S 6 VENDOME COURT BETHESDA MD 20817	INFORMATION REQUESTED	09/22/87	2,000.00
(X)PRI ( )GEN ( )OTHER:	AGGREGATE YTD 2,000.00*		
FRIED, MR MIKE 6 PETER COOPER RD NEW YORK CITY NY 10010	THE RELATED COMPANIES EXECUTIVE	09/25/87	1,000.00
(X)PRI ( )GEN ( )OTHER:	AGGREGATE YTD 1,000.00		
FRIED, MR STANLEY L 292 HARBOR DRIVE LIDO BEACH NY 11561	INFORMATION REQUESTED	08/19/87	500.00
(X)PRI ( )GEN ( )OTHER:	AGGREGATE YTD 500.00		
FRIEDBERG, MR M PAUL 116 WEST 88TH STREET NEW YORK NY 10024	INFORMATION REQUESTED	09/25/87	1,000.00
(X)PRI ( )GEN ( )OTHER:	AGGREGATE YTD 1,000.00		
FRIEDLANDER, MRS AUGUSTA R INFORMATION REQUESTED	INFORMATION REQUESTED	09/18/87	1,000.00
(X)PRI ( )GEN ( )OTHER:	AGGREGATE YTD 1,000.00		

SUBTOTAL OF RECEIPTS THIS PAGE RECEIPT AMOUNT 9,000.00

*SEE FOOTNOTE ON LAST PAGE OF LINE 17A

FEC 9304095238 1

06C3978

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

92 JAN -6 PM 1:11

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

92 JAN -6 PM 3:41
RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

January 3, 1992

Lawrence D. Parrish, Esq.
Staff Attorney
Federal Election Commission
Washington, D.C. 20463

Re: MUR 3309 -- Contran

Dear Mr. Parrish:

Confirming our telephone conversation this morning, Contran desires to pursue pre-probable cause conciliation. I am currently gathering information that should be useful in this process, and I should be sending it to you in the next few weeks.

Sincerely,

Philip S. Beck

PSB/dec

2304095523382

MUR 3309

EVERGREEN INTERNATIONAL AVIATION, INC.

3850 Three Mile Lane • McMinnville, OR 97128-9496 USA
Phone (503) 472-9361 • Fax (503) 472-1048
Telex 360841 • SITA HDQ00EZ

December 29, 1991

30 YEARS OF QUALITY WITHOUT COMPROMISE

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
92 JAN -6 PM 3:42

Mr. Jeffrey Long
Federal Election Commission
999 E. Street N.W.
Washington, D.C. 20463

Re: MUR 3309, Delford M. Smith

This letter is in follow up to our telephone conversation of December 30, 1991 wherein I informed you that the material which you supplied me in your letter of December 12th, (which was received here of December 17th) did not clarify the discrepancies between checks and the amount stated in your November 12th letter "Factual and Legal Analysis" attachment.

Mr. Smith, being the owner of one of the major businesses in Oregon, is continuously sought out for donations, and is generous in his support of those who seek him out. There is more than one authorized signor on his personal account and at least one of the checks in question was signed by another party who was possibly unaware of Mr. Smith's other donation, and who most likely was unaware of any limitations on donations.

You stated that your were dealing with a large number of respondents in this case and acknowledged, that for the most part, such violations were in innocent unawareness of the limitations.

The campaign committees and the persons who operate them should certainly be aware of the limitations, and I would ask that you consider placing the burden with those with the knowledge and who are soliciting the funds.

I look forward to this matter being closed without penalty to Mr. Smith, and a refund of his donation over the limit as is required by law.

Thank you for assistance and your consideration.

Very truly yours,

Dennis V. Griffiths, Esq.

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM
92 JAN -6 AM 10:06

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MUR 3997

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

92 JAN -7 AM 7:42

EDMUND S. WARTELS
Crow Hill Road
Mt. Kisco, New York 10549

January 6, 1992
FEDERAL EXPRESS

92 JAN -7 AM 11:13
RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

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

Re: **MUR 3309**

Gentlemen:

In response to your letter dated November 21, 1991, I respectfully submit this letter in support of my belief that I did not violate the Federal Election Campaign Act of 1971 or the regulations thereunder.

In 1987 Craig P. Heard, Chief Executive Officer of Winston Network, Inc. (the "Company"), which was at that time a client of the law firm of Hall, Dickler, Lawler, Kent & Friedman in which I was then and now am a partner, was supporting Senator Bob Dole in his campaign to obtain the Republican Presidential nomination. Mr. Heard asked our Firm to make a contribution to the Dole campaign. The Firm sent its check for $3,000 to the Dole For President Exploratory Committee in July 1987. By letter dated July 27, 1987 (copy enclosed), the Committee advised the Firm that under the Federal Election Law it could only retain $1,000 of this contribution and accordingly, returned $2,000 to the Firm. I did not see this letter at that time.

Subsequently, by check dated August 27, 1987 (copy of cancelled check enclosed), I made a contribution of $1,000 from my personal funds to the Dole For President Exploratory Committee. I made no other contribution to this Committee. My records further indicate that the Dole For President Exploratory Committee returned $833.33 to me in early January 1988, which I deposited to my account on January 6, 1988. The net effect of this was that I made a personal contribution of $166.67 to the Dole For President Exploratory Committee.

9304095238 4

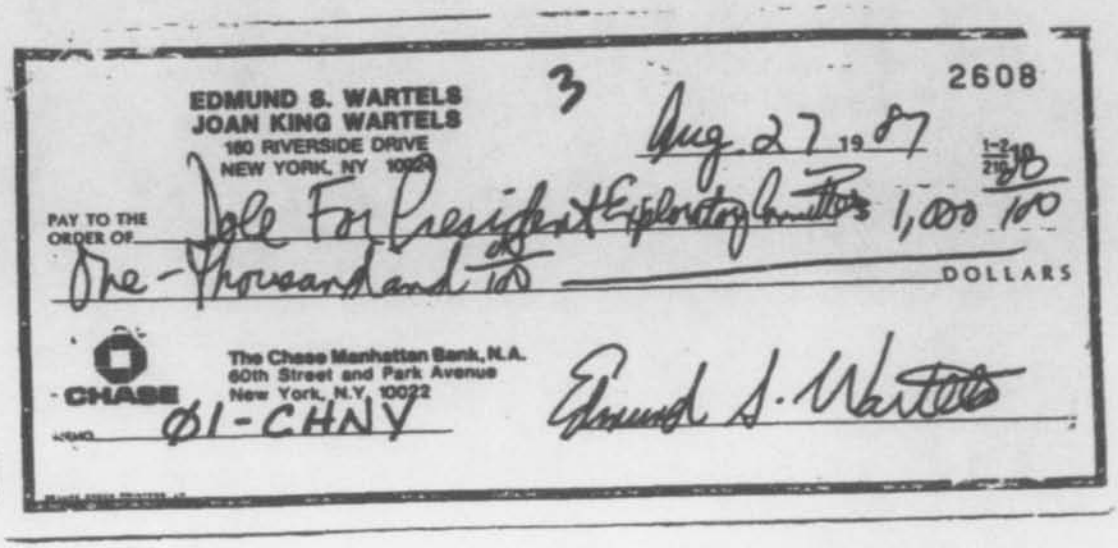
At the time the Firm contributed $1,000 to the Committee, there were 23 partners in the Firm; accordingly, my pro-rata share of that contribution was $43.48, which, when added to my $166.67 personal contribution, would indicate that I made a total contribution of $210.15.

Very truly yours,

Edmund S. Wartels

Encs.

23040952385



EDMUND S. WARTELS
JOAN KING WARTELS
160 RIVERSIDE DRIVE
NEW YORK, NY 10024

3

2608

Aug 27 1987

1-2
210

PAY TO THE ORDER OF Sole For Prezight Exploratory Limited $ 1,000 00/100

One-Thousand and 00 DOLLARS

CHASE

The Chase Manhattan Bank, N.A.
60th Street and Park Avenue
New York, N.Y. 10022

⑆021-CHNY

Edmund S. Wartels

⑈2608⑈ ⑆021000021⑆ 930409523886

BOB DOLE President

July 27, 1987

Hall, Dickler, Lawler, Kent & Friedman
460 Park Avenue
New York, New York 10022

Dear Sirs:

Thank you very much for your recent contribution of $3,000 to Senator Dole's Presidential effort. Unfortunately, we must return $2,000 of your contribution inasmuch as Federal Election law limits contributions to $1,000 per partnership.

You can be sure that Senator Dole appreciates your support and would, of course, be delighted if the partners wished to make a personal contribution. It should be noted that a partner's share of a partnership contribution counts against that partner's individual $1,000 limit as well.

Yours truly,

Dole for President
Exploratory Committee, Inc.

Enclosure

93040952387

1828 L Street, N.W., Suite 805, Washington, D.C. 20036
(202) 223-9400
Paid for by Dole for President Exploratory Committee

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 8, 1992

John J. Maiorana, Esquire
RBA Group
1 Evergreen Place
P.O. Box 1927
Morristown, NJ 07962-1927

Re: MUR 3309
RBA Group

Dear Mr. Maiorana:

Enclosed you will find the requested copy of the contribution check from the RBA Group to the Dole for President Committee from which the Commission concluded their finding of reason to believe the RBA Group violated 2 U.S.C. § 441b.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Lawrence D. Parrish

Lawrence D. Parrish
Staff Attorney

Encl:

9304095523888

3389

[redacted]

The RBA (ENGINEERS • ARCHITECTS • PLANNERS)
Morristown, NJ
New York, NY
Columbia, MD
Atlanta, GA
Baton Rouge, LA

020175

55-98
212

PAY **TWO THOUSAND DOLLARS AND 00/100**

VERIFIED #5885

DATE 12/2/87

PAY EXACTLY $ **2,000.00**

TO THE ORDER OF DOLE FOR PRESIDENT COMMITTEE

THE NATIONAL STATE BANK
Hillside, N.J.

William L. Rowe
AUTHORIZED SIGNATURE

Lillard E. Knapp
AUTHORIZED SIGNATURE

[redacted] 752NV

⑈020175⑈ ⑆021200986⑆ 200-119-931⑈

WILEY, REIN & FIELDING

1776 K STREET, N.W.
WASHINGTON, D.C. 20006
(202) 429-7000

FACSIMILE
(202) 429-7049
TELEX 248349 WYRN UR

January 9, 1992

WRITER'S DIRECT DIAL NUMBER
(202) 429-7301

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

Attn: Jeffrey Long

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
92 JAN -9 AM 9:51

Re: MUR 3309 (General Electric Company Political Action Committee and Robert W. Nelson, as Treasurer)

Dear Mr. Noble:

This Response, including the attached affidavit, is submitted on behalf of the General Electric Company Political Action Committee ("GEPAC") and Robert W. Nelson, as Treasurer ("Respondents"), in reply to the Federal Election Commission's finding that there is reason to believe that GEPAC violated the Federal Election Campaign Act of 1971, as amended ("Act"), in Matter Under Review ("MUR") 3309. For the reasons set forth herein, the Federal Election Commission ("FEC" or "Commission") should find no probable cause to believe that GEPAC violated the Act.

2340952390

The Factual and Legal Analysis

The Factual and Legal Analysis in this Matter explains that, based on the Commission's examination and audit of the

Dole Committee records, the Commission found reason to believe that GEPAC made three contributions to the Dole for President Committee ("Dole Committee") which, when aggregated, are in excess of the $5,000 contribution limit applicable to multi-candidate committees pursuant to 2 U.S.C. § 441a(a)(2)(A).[1] However, the relevant documentation for this disputed $7,000 has not been attached to the Factual and Legal Analysis.

Response

Contrary to the representation in the Factual and Legal Analysis, GEPAC did not make any contributions to the Dole for President Committee. Affidavit Before the Federal Election Commission in Matter Under Review 3309 ("Nelson Aff.") at ¶ 3. Thus, not only is GEPAC not over the contribution limits, but all of the contributions referenced in the Factual and Legal Analysis were earmarked to the Dole For President Committee by General Electric employees.

---

[1] The contributions were identified as follows:

Date	Amount
11/23/87	$5,000
12/24/87	$1,000
2/12/88	$1,000.

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While the Factual and Legal Analysis does not provide copies of the contributions it references, GEPAC "has undertaken to reconstruct the events which may have led to the conclusion that it made any contributions to the Dole for President Committee." Id. In so doing, GEPAC has identified three checks which were issued in proximity to the dates and amounts identified in the Factual and Legal Analysis. Id. ¶ 4. Each of these checks, attached hereto, dated November 12, 1987 for $5,000, December 3, 1987 for $1,000, and February 1, 1988 for $1,000 states, on its face, that it represents an earmarked contribution. Id.

Further, each check was accompanied by a letter which notified the Dole for President Committee that the contributions were earmarked by each of the individuals identified in the letters. Id., Exhibit 1. Each contribution was reported by GEPAC as an earmarked contribution. Id. Thus, each of these contributions should have been treated by the Dole for President Committee as having been made by each of the individuals in question, not by the Committee, pursuant to 2 U.S.C. § 441a(a)(8) and 11 C.F.R. § 110.6.

In summary, GEPAC made no contributions to the Dole for President Committee. Rather, each of the contributions at

9304095239 2

issue was earmarked to the Dole Committee through the GEPAC which acted only as a conduit for these contributions. Perhaps, the Dole Committee records did not contain the documentation previously provided by GEPAC, and attached to this response (Exhibit 1, Attachment A). Any failure by the Dole Committee to properly report these contributions does not provide the basis for finding that the GEPAC violated the law.

Accordingly, at the appropriate time, the Commission should find no probable cause to believe that the General Electric Company Political Action Committee and Robert W. Nelson, as Treasurer, violated the law.

Sincerely,

Carol A. Laham

Carol A. Laham

Counsel for General Electric
Company Political Action
Committee and Robert W. Nelson,
as Treasurer

cc: Robert W. Nelson

2340952393

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OFFICE OF GENERAL COUNSEL
92 JAN -9 AM 9:51

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EXHIBIT 1

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OFFICE OF GENERAL COUNSEL
92 JAN -9 AM 9:51

BEFORE THE FEDERAL ELECTION COMMISSION

State of Florida)
) Matter Under Review 3309
County of Palm Beach)

AFFIDAVIT OF ROBERT W. NELSON

ROBERT W. NELSON, first being duly sworn, deposes and says:

1. I am Robert W. Nelson. I am the Treasurer of the General Electric Company Political Action Committee ("Committee").

2. I have reviewed the Factual and Legal Analysis sent to the Committee as an attachment to Chairman McGarry's letter which notified the Committee that the Federal Election Commission had found reason to believe that it may have violated the Federal Election Campaign Act of 1971, as amended ("Act"). As Treasurer of the Committee, I am familiar with each contribution made by the Committee.

3. The Factual and Legal Analysis identifies the following contributions as having been made by the Committee:

Date	Amount
11/23/87	$5,000
12/24/87	$1,000
2/12/88	$1,000.

However, the relevant documentation for this disputed $7,000 was not attached to the Factual and Legal Analysis, and, in fact, the Committee did not make any contributions to the Dole for President Committee. Thus, the Committee has

2304095239 5

undertaken to reconstruct the events which may have led to the conclusion that it made any contributions to the Dole for President Committee.

4. In reviewing our records, the Committee has identified three checks representing earmarked contributions to either the Dole for President Committee of the Dole Compliance Fund by individual executives of General Electric which were issued in proximity to the contribution dates identified above. Attached hereto are copies of each of the checks, dated November 12, 1987 for $5,000, December 3, 1987 for $1,000, and February 1, 1988 for $1,000 sent to the Dole For President Committee which on their face identified each of the contributions as having been earmarked to the Committee, in addition to the letters which I sent to the Dole Committee at the time of these contributions identifying the contributions as having been earmarked through the Committee and providing the names of the individuals who had made the contributions and in the amounts made. Further, the Committee reported each of these contributions as earmarked contributions to the Dole for President Committee or the Dole Compliance Fund.

5. As earmarked contributions, these contributions were not made by the Committee and were not excessive, rather they were attributable to each of the

9304095239 6

individuals who chose to earmark their contributions to the Dole for President Committee.

6. Upon receiving the Factual and Legal Analysis, the Committee reviewed the Dole for President Committee filings and has determined that none of these contributions were reported as having been earmarked.

The above information is true and correct to the best of my knowledge.

Robert W. Nelson

Robert W. Nelson

Boca Raton, Florida

Subscribed to and sworn before me this 7th day of January, 1992.

Betty J Lance

Notary Public

My Commission Expires: Nov. 19, 1992

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OFFICE OF GENERAL COUNSEL
92 JAN -9 AM 9:51

ATTACHMENT A

93040095239 8

NON • PARTISAN POLITICAL SUPPORT COMMITTEE
FOR GENERAL ELECTRIC COMPANY EMPLOYEES

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
92 JAN -9 AM 9:51

November 12, 1987

The Honorable Robert J. Dole
Dole for President Committee, Inc. (C00213850)
1828 L Street, NW - Suite 805
Washington, DC 20036

Dear Senator Dole:

On behalf of General Electric executive and professional employees contributing to the Non-Partisan Political Support Committee, it gives me great pleasure to enclose this Committee check for $5,000 to help finance your 1988 Presidential primary election campaign.

This contribution to your campaign has been specifically earmarked by the General Electric executives listed below. You may wish to acknowledge receipt of the contribution directly to them.

We wish you all success in your campaign.

Sincerely,

Robert W. Nelson

Robert W. Nelson
Treasurer

RWN:glc

Enclosure

c: Richard E. Fagerberg
Constituent Relations Program Manager

(Please see attached for list of individuals earmarking)

General Electric Company, Fairfield, Ct. 06431
(203) 373-2052 or Dial Comm 8-229-2052

93040952399

Individuals earmarking for Senator Dole:

Francis X. Barrett ($750)
President & General Manager
Electric Mutual Liability Insurance Company
General Electric Company
715 Lynnway
Lynn, MA 01905

Philip J. Caliendo ($250)
Manager
Engineering Resources
General Electric Company
1285 Boston Avenue
Bridgeport, CT 06601-2385

James J. Costello ($1,000)
Vice President & Comptroller
Corporate Accounting Operation
General Electric Company
3135 Easton Turnpike
Fairfield, CT 06431

Phillips S. Peter ($1,000)
Vice President
Corporate Government Relations
General Electric Company
1331 Pennsylvania Avenue, NW
Suite 800 South
Washington, DC 20004

Louis V. Tomasetti ($1,000)
Senior Vice President
GE Aerospace
General Electric Company
Valley Forge Space Center
P.O. Box 8555
Philadelphia, PA 19101

Paul W. Van Orden ($1,000)
Corporate Executive Office
Executive Vice President
General Electric Company
3135 Easton Turnpike
Fairfield, CT 06431

930409524000

NON PARTISAN POLITICAL
SUPPORT COMMITTEE
FOR GENERAL ELECTRIC
COMPANY EMPLOYEES,
FAIRFIELD, CT 06431

9 JR VERIFIED

4453

1-24-87 009 03 [illegible] 204425920

51-32
211 85

November 12, 1987

PAY
TO THE
ORDER OF Dole for President Committee, Inc. $ **5000.00**

**Five thousand and 00/100---------- DOLLARS

17 11-23-87 [illegible] 200430838

Connecticut National Bank Bc- BCBE 24-87 [illegible]

FOR (C00213850) 1988 Presidential - Primary
Earmarked

David F St. Laurent

"004453" :021600329: 0607 9180" "0000500000"

930409524001

[illegible] 204425920

THANK YOU FOR YOUR CONTRIBUTION
FOR DEPOSIT ONLY
TO 952-0024719
DOLE FOR PRESIDENT COMMITTEE

PROCESSED
JAN 24 1992

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
92 JAN -9 AM 9:51

NON • PARTISAN POLITICAL SUPPORT COMMITTEE
FOR GENERAL ELECTRIC COMPANY EMPLOYEES

December 3, 1987

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
92 JAN -9 AM 9:51

The Honorable Robert J. Dole
Dole for President Committee, Inc. (C00213850)
1828 L Street, NW - Suite 805
Washington, DC 20036

Dear Senator Dole:

On behalf of General Electric executive and professional employees contributing to the Non-Partisan Political Support Committee, it gives me great pleasure to enclose this Committee check for $1,000 to help finance your 1988 Presidential primary election campaign.

This contribution to your campaign has been specifically earmarked by the General Electric executive listed below. You may wish to acknowledge receipt of the contribution directly to him.

We wish you all success in your campaign.

Sincerely,

Robert W. Nelson

Robert W. Nelson
Treasurer

RWN:glc

Enclosure

c: Richard E. Fagerberg
Constituent Relations Program Manager

Lawrence A. Bossidy
Vice Chairman of the Board & Executive Office
General Electric Company
3135 Easton Turnpike
Fairfield, CT 06431

General Electric Company, Fairfield, Ct. 06431
(203) 373-2052 or Dial Comm 8-229-2052

930409524002

NON PARTISAN POLITICAL SUPPORT COMMITTEE
FOR GENERAL ELECTRIC COMPANY EMPLOYEES
FAIRFIELD, CT 06431

4463

VERIFIED

2-28-87 00 0633 204351609

51-32/211 85

PAY TO THE ORDER OF Dole for President Committee, Inc.

12-24-87 552002471 9 103812325 December 3, 19 87

One thousand and 00/100---------- $ **1000.00

DOLLARS

Connecticut National Bank
CTPMCT

FOR (C00213850) Presidential Primary
Earmarked

Robert W. Nelson
David F St. Germain

"004463" :021600329: 0607 9180" "0000100000"

9300409524003

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

92 JAN -9 AM 9:51

NON • PARTISAN POLITICAL SUPPORT COMMITTEE

FOR GENERAL ELECTRIC COMPANY EMPLOYEES

February 1, 1988

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
92 JAN -9 AM 9:52

The Honorable Robert J. Dole
Dole for President Committee, Inc. (C00213850)
1828 L Street, NW - Suite 805
Washington, DC 20036

Dear Senator Dole:

On behalf of General Electric executive and professional employees contributing to the Non-Partisan Political Support Committee, it gives me great pleasure to enclose this Committee check for $1,000 to help finance your 1988 Presidential campaign. This is to be allocated to your Compliance Fund.

This contribution to your campaign has been specifically earmarked by the General Electric executive listed below. You may wish to acknowledge receipt of the contribution directly to him.

We wish you all success in your campaign.

Sincerely,

Robert W. Nelson

Robert W. Nelson
Treasurer

RWN:glc

Enclosure

c: Richard E. Fagerberg
Constituent Relations Program Manager

Lawrence A. Bossidy
Vice Chairman of the Board & Executive Officer
General Electric Company
3135 Easton Turnpike
Fairfield, CT 06431

General Electric Company, Fairfield, Ct. 06431
(203) 373-2052 or Oial Comm 8-229-2052

93040952404

NON PARTISAN POLITICAL SUPPORT COMMITTEE
FOR GENERAL ELECTRIC COMPANY EMPLOYEES
FAIRFIELD, CT 06431

4507

VERIFIED

February 1, 19 88

91-32/211

PAY TO THE ORDER OF Dole for President Committe, Inc. $ **1000.00**

**One thousand and 00/100 DOLLARS

Connecticut National Bank

FOR (C00213850) 1988 Presidential Compliance Fund

Earmarked

⑈004507⑈ ⑆021100329⑆ 0607 9180⑈ ⑈0000100000⑈

0111-0046-1 PARAMUS BANK 0510-0003-3
WINDSOR LOCKS OFFICE CHECKING 0510-0003-3
1 02-15-88 30451156

P.E. FOR PRESIDENT COMMITTEE
FOR DEPOSIT ONLY
CONTRIBUTION
THANK YOU FOR YOUR

SIGNET BANK/VA 051000778
12-88 6520024719 1042634

1723 31164

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
92 JAN -9 AM 9:52

930409524005

KENNEDY COVINGTON LOBDELL & HICKMAN

ATTORNEYS AT LAW
3300 NCNB PLAZA
CHARLOTTE, NORTH CAROLINA 28280-8082
TELEPHONE 704/377-6000

SOUTH CAROLINA OFFICE
THE GUARDIAN BUILDING
ONE LAW PLACE-SUITE 301
P. O. BOX 1429
ROCK HILL, S.C. 29731-1429
*TELEPHONE 803/327-6171

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CHARLOTTE 704/331-7598
ROCK HILL 803/324-4737

WRITER'S DIRECT DIAL NUMBER
704/331-7452

MARCUS T. HICKMAN
CLARENCE W. WALKER
JAMES E. (BILL) WALKER
HENRY C. LOMAX
EDGAR LOVE III
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WILLIAM N. HARRIS
ALLISON R. BARNHILL
BARBARA R. FRITH
J. ANDRE HALL

A. LEE HOGEWOOD III
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C. CORLEY HOLT
FELICIA A. WASHINGTON
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CLIFFORD R. JARRETT
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FRANK H. KENNEDY
1893-1975
HUGH L. LOBDELL
1908-1982

OF COUNSEL
W. T. COVINGTON, JR.
DAVID GRIER MARTIN, JR.

SPECIAL COUNSEL
THOMAS R. PAYNE
ROBERT R. CARPENTER**

EXCEPT AS NOTED ATTORNEYS ADMITTED IN N.C. ONLY
*ADMITTED IN N.C. AND S.C.
**ADMITTED IN S.C. ONLY

January 14, 1992

Lawrence D. Parrish, Esq.
General Counsel's Office
Federal Election Commission
Washington, D.C. 20463

Re: MUR 3309
Becon Construction Company
Our File No. 06423-007

Dear Mr. Parrish:

Pursuant to our telephone conversation of this afternoon, request is hereby made for an extension until February 6, 1992, to respond to the Commission's findings in the above-referenced matter.

As I advised you by telephone, I hope that we will be able to secure the additional documentation which we need in order to respond to the Commission's findings from Scott Morgan of the Dole for President Committee.

As I also advised you, the documents which you so kindly forwarded to me are quite helpful.

If you have any questions, please contact me at (704) 331-7452.

Sincerely,

Marcus T. Hickman
For the Firm

MTH/bc

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
92 JAN 16 PM 3:39

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM
92 JAN 16 AM 11:29

93040952406

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 17, 1992

Marcus T. Hickman, Esquire
Kennedy Covington Lobdell
& Hickman
3300 NCNB Plaza
Charlotte, NC 28280-6000

Re: MUR 3309
Becon Construction Company

Dear Mr. Hickman:

This is in response to your letter dated January 14, 1992, which we received on January 15, 1992, requesting an additional extension until February 6, 1992 to respond to the Commission's finding. 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 February 6, 1992.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Lawrence D. Parrish

Lawrence D. Parrish
Staff Attorney

2304095240 7

OGC 4095

JONES, DAY, REAVIS & POGUE

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AUSTIN
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TAIPEI
TOKYO

METROPOLITAN SQUARE
1450 G STREET, N.W.
WASHINGTON, D.C. 20005-2088

TELEPHONE 202-879-3939
TELEX: DOMESTIC 892410
TELEX: INTERNATIONAL 64363
CABLE: ATTORNEYS WASHINGTON
FACSIMILE 202-737-2832
WRITER'S DIRECT NUMBER:

2765.1:rtj
283650-005-001

(202) 879-4640

January 15, 1992

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
92 JAN 15 PM 3:34

VIA HAND DELIVERY

Mr. Jeffrey Long
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 3309

Dear Jeffrey:

Pursuant to our telephone conversation of today, please find enclosed an originally executed Statement of Designation of Counsel for the above-referenced matter.

If I can be of further assistance, please call.

Sincerely,

R. Todd Johnson

Enclosure

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
92 JAN 15 PM 3:46

JONES, DAY, REAVIS & POGUE

9304095240 8

92 JAN 15 PM 3:34

FEDERAL ELECTION COMMISSION

STATEMENT OF DESIGNATION OF COUNSEL

MUR 3309

NAME OF COUNSEL: R. Todd Johnson, Esq.

ADDRESS: Jones, Day, Reavis & Pogue
Metropolitan Square
1450 G. Street, N.W.
Washington, D.C. 20005-2088

TELEPHONE: (202) 879-4610

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.

JAN 13, 1992
Date

Harry D. Slaughter by
Signature

RESPONDENT'S NAME: Ernst & Young Los Angeles Political Action Committee (EYLA-PAC) (FKA, AYLA-PAC)
Harry D. Slaughter, Treasurer
515 South Flower Street
Los Angeles, California 90017

BUSINESS PHONE:

930400952409

Ernst & Young - Los Angeles
Political Action Committee
515 South Flower Street
Los Angeles, CA 90071

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

92 JAN 16 AM 11:25

January 10, 1992

Mr. Jeffrey Long
Federal Election Commission
999 E Street, NW
Washington , DC 20463

92 JAN 16 PM 3:39
RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

Matter Under Review (MUR #3309)

Dear Mr. Long:

This letter is to confirm our telephone conversation earlier this week concerning the allegations that the Ernst & Young Los Angeles PAC had made contributions to the Dole for President Committee in excess of the contributions allowed by law.

I informed you that the PAC referred to in your MUR #3309 had made no contributions to the campaign of Dole for President. I have checked the records of the PAC then know as the Arthur Young Los Angeles PAC for the entire year of 1987 and also 1986 to assure that there were no such contributions.

You indicated in your return phone call to me that it did appear there was a mistake in associating these contributions with this PAC (FEC ID# C00103606).

Please let me know if any further action is required on my part to resolve this matter.

If there are any questions my direct phone in Los Angeles is 213/977-3567.

Sincerely,

Harry D. Slaughter III, Treasurer
Ernst & Young - Los Angeles PAC

Copy to: John E. Toole

9304095241 0

KENNEDY COVINGTON LOBDELL & HICKMAN

ATTORNEYS AT LAW
3300 NCNB PLAZA
CHARLOTTE, NORTH CAROLINA 28280-8082
TELEPHONE 704/377-6000

SOUTH CAROLINA OFFICE
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CHARLOTTE 704/331-7598
ROCK HILL 803/324-4737

WRITER'S DIRECT DIAL NUMBER
704/331-7452

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A. LEE HOGEWOOD III
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JAMES E. EARLE
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CLIFFORD R. JARRETT
CAROL A. JONES VAN BUREN

FRANK H. KENNEDY
1893-1975
HUGH L. LOBDELL
1908-1982

OF COUNSEL
W. T. COVINGTON, JR.
DAVID GRIER MARTIN, JR.

SPECIAL COUNSEL
THOMAS R. PAYNE
ROBERT R. CARPENTER**

EXCEPT AS NOTED ATTORNEYS ADMITTED IN N.C. ONLY
*ADMITTED IN N.C. AND S.C.
**ADMITTED IN S.C. ONLY

January 30, 1992

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
92 FEB -3 PM 3:48

Lawrence D. Parrish, Esq.
General Counsel's Office
Federal Election Commission
Washington, D. C. 20463

Re: MUR 3309
Becon Construction Company
Our File No. 06423-007

Dear Mr. Parrish:

Pursuant to our telephone conversation of today, request is hereby made for an extension until February 26, 1992, to respond to the Commission's findings in the above-referenced matter.

As I advised you by telephone, I am still trying to secure additional material and documentation on one item. We are anxious to bring this matter to a conclusion at the earliest possible time. Hopefully, this matter can be resolved within the requested 20-day extension.

Sincerely,

Marcus T. Hickman
For the Firm

MTH/bc

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM
92 FEB -3 AM 9:00

93040952411

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 11, 1992

Marcus T. Hickman, Esquire
Kennedy Covington Lobdell
& Hickman
3300 NCNB Plaza
Charlotte, NC 28280-6000

Re: MUR 3309
Becon Construction Company

Dear Mr. Hickman:

This is in response to your letter dated January 30, 1992, which we received on February 3, 1992, requesting an additional extension until February 26, 1992 to respond to the Commission's finding. 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 February 26, 1992.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Lawrence D. Parrish

Lawrence D. Parrish
Staff Attorney

2304095241 2

OGC 42 69

JONES, DAY, REAVIS & POGUE

ATLANTA, AUSTIN, BRUSSELS, CHICAGO, CLEVELAND, COLUMBUS, DALLAS, FRANKFURT, GENEVA, HONG KONG, IRVINE, LONDON, LOS ANGELES, NEW YORK, PARIS, PITTSBURGH, RIYADH, TAIPEI, TOKYO

METROPOLITAN SQUARE
1450 G STREET, N.W.
WASHINGTON, D.C. 20005-2088

TELEPHONE: 202-879-3939
TELEX: DOMESTIC 892410
TELEX: INTERNATIONAL 64363
CABLE: ATTORNEYS WASHINGTON
FACSIMILE: 202-737-2832
WRITER'S DIRECT NUMBER:

January 31, 1992

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
92 JAN 31 PM 3:37

VIA HAND DELIVERY

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

Re: MUR 3309

Dear Jeff:

Enclosed for filing on behalf of Ernst & Young Los Angeles -- Political Action Committee and Harry D. Slaughter, III is a Submission in Response to Federal Election Commission MUR 3309. Please note that the original Submission contains an originally executed affidavit.

For your convenience, I am also enclosing four complementary copies of our Submission. Please return the fifth copy of our Submission, file-stamped, with the messenger.

As I mentioned in our telephone conversation this afternoon, I would appreciate the opportunity to meet concerning our Submission with representatives of the Office of General Counsel, the Audit Division and the Reports Analysis Division. Please give me a call so that we might arrange a mutually agreeable time for such a meeting.

Sincerely,

R. Todd Johnson

Enclosures

9304095241 3

1931K

JONES, DAY, REAVIS & POGUE

ATLANTA
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CHICAGO
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DALLAS
FRANKFURT
GENEVA
HONG KONG
IRVINE
LONDON
LOS ANGELES
NEW YORK
PARIS
PITTSBURGH
RIYADH
TAIPEI
TOKYO

METROPOLITAN SQUARE
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TELEPHONE: 202-879-3939
TELEX: DOMESTIC 892410
TELEX: INTERNATIONAL 64363
CABLE: ATTORNEYS WASHINGTON
FACSIMILE: 202-737-2832
WRITER'S DIRECT NUMBER:

January 31, 1992

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
92 JAN 31 PM 3:37

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

Re: Submission in Response to Federal Election Commission MUR 3309

Dear Mr. Noble:

Ernst & Young Los Angeles - Political Action Committee (ID #C00103606), formerly known as Arthur Young & Company - Los Angeles Political Action Committee or AYLA-PAC ("EYLA-PAC"), and Harry D. Slaughter III, as treasurer, by and through their attorneys, respectfully request that, for the reasons set forth herein, no further action be taken (1) in connection with the respondents in MUR 3309, and (2) in connection with the facts upon which MUR 3309 is based.

By letter dated November 21, 1991, the Federal Election Commission (the "FEC" or the "Commission") notified EYLA-PAC and Harry Slaughter that on October 29, 1991, the FEC found reason to believe that EYLA-PAC and Mr. Slaughter, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A). Tab 18. In particular, the Factual and Legal Analysis accompanying the November 21, 1991 FEC letter alleges that EYLA-PAC contributed $7,500 to the Dole for President Committee, Inc., formerly known as the Dole for President Exploratory Committee (the "Dole Committee"), between May 1987 and December 1987.

Mr. Slaughter reviewed the records of EYLA-PAC, found no contributions by EYLA-PAC to the Dole Committee during 1987 or 1986, and conveyed his findings (by telephone and then by letter dated January 10, 1992) to Jeffrey Long, Staff Member at

9304095241 4

the FEC. Tab 19.[1/] In that initial telephone conversation and again in subsequent conversations between FEC staff members and representatives of EYLA-PAC, the Commission staff has acknowledged that EYLA-PAC was improperly named as the respondent in MUR 3309. Although a separate political committee sponsored by other partners of Arthur Young & Company did make contributions to the Dole Committee in 1987 and 1988, such contributions did not exceed the amount permitted by law and thus did not violate 2 U.S.C. § 441a(a)(2)(A).

For these reasons and for the reasons set forth below, we respectfully request that no further action be taken against EYLA-PAC or its treasurer, or against any other entity in connection with the facts upon which MUR 3309 is based.

BACKGROUND

EYLA-PAC was established in September 1978 by the partners of the Los Angeles office of Arthur Young & Company. EYLA-PAC was terminated on November 1, 1991. Prior to the merger of Arthur Young & Company and Ernst & Whinney to form Ernst & Young on or about October 1, 1990, different partners of Arthur Young & Company sponsored several political committees in addition to EYLA-PAC:

1. Federal Arthur Young & Company Political Action Committee ("FAY-PAC") (ID #C00035493);[2/]

2. Arthur Young & Company, Dallas, Political Action Committee ("AYD-PAC") (ID #C00134650) (terminated January 5, 1990);

3. Arthur Young - Milwaukee Political Action Committee ("AYM-PAC") (ID #C00163824) (terminated August 2, 1991);

1/ A subsequent review of the public records of EYLA-PAC from the date of its origin in 1978 to the date of its termination in November 1991 reveals that EYLA-PAC never reported making a contribution to the Dole Committee.

2/ Originally known as the Arthur Young Employees Political Action Committee when it was organized in January 1976, FAY-PAC changed its name in 1978 to the Arthur Young & Company Political Action Committee, and again in December 1987 to the Federal Arthur Young Political Action Committee. Tab 9. FAY-PAC was terminated as of September 21, 1990.

2304095241 5

4. Arthur Young - Kansas City Political Action Committee ("AYKC-PAC") (ID #C00180851) (terminated in August 1986).

Neither EYLA-PAC nor any of the political committees sponsored by the various partners of Arthur Young & Company ever made contributions to the Dole Committee except for FAY-PAC.[3/] FAY-PAC is a qualified multi-candidate committee within the meaning of 11 CFR 100.5(e)(3), and was so qualified prior to 1987. Therefore, during the 1987-1988 election cycle, FAY-PAC was entitled to contribute $5,000 per election to any candidate for election to federal office. 2 U.S.C. § 441a(a)(2)(A).

There has been no violation of 2 U.S.C. § 441a(a)(2)(A). The contributions totaling $7,500, as identified by the FEC in its Factual and Legal Analysis supporting its letter of November 21, 1991 to Harry D. Slaughter, include $5,000 in contributions to FAY-PAC that were specifically earmarked by the contributor for the Dole Committee. Under relevant provisions of the Federal Election Campaign Act of 1971, as amended (the "Act"), and Commission regulations, earmarked contributions are deemed to be made by the original contributor and not the political committee that acts as a conduit or intermediary in forwarding such contributions to the designated candidate without exercising direction or control over the funds. The following summary of the facts relevant to the Commission's allegations, together with the attached supporting

---

3/ The Commission's error in making a "reason to believe finding" against EYLA-PAC arises from a simple error by the Commission staff. The FEC's computer system incorrectly refers to EYLA-PAC in the 1987-88 data base as Arthur Young & Company PAC -- the same name printed on the checks discovered in the audit of the Dole Committee and which the Commission alleges as evidence of $7,500 in contributions by a political committee in 1987. Of course, a simple search by the Commission staff would have revealed the mistaken identity in a number of ways: (1) EYLA-PAC's reports show no contributions to the Dole Committee; (2) the signatory on each of the checks discovered in the Commission's audit of the Dole Committee was, in fact, the treasurer of FAY-PAC from the date of its formation until the date of its termination, a fact that could have been discovered through a computer search of Commission data; and (3) FAY-PAC's reports disclose the contributions in question as a combination of earmarked contributions and direct contributions.

9304095241 6

documentation and affidavit all support a finding that no further action should be taken under MUR 3309 or in connection with the facts alleged therein.

FACTS

Of the $7,500 contributed to the Dole Committee by or through FAY-PAC in 1987-88, only $2,500 -- half of the amount permitted by law -- consisted of direct contributions by FAY-PAC.[4/] The remaining $5,000 were individual contributions to FAY-PAC specifically earmarked by the contributors for the Dole Committee. The earmarked contributions were deposited in FAY-PAC's account, but were forwarded promptly to the Dole Committee through checks of FAY-PAC.

The transactions at issue began on May 21, 1987, when FAY-PAC wrote a $1,000 check to the Dole Committee. Tab 1. FAY-PAC disclosed this contribution in its 1987 June Monthly Report of Receipts and Disbursements. Tab 2. The Dole Committee reported receipt of this contribution in its 1987 July 15 Quarterly Report of Receipts and Disbursements. Tab 3. FAY-PAC contributed another $1,000 to the Dole Committee by check dated July 23, 1987 (Tab 4) and reported the disbursement in its 1987 August Monthly Report of Receipts and Disbursements. Tab 5.[5/]

In December of 1987, FAY-PAC received checks made payable to FAY-PAC from ten individuals, which designated a total of $5,000 for Dole:

9304095241 7

4/ If the $1,000 refund from the Dole Committee (see footnote 6 infra) is applied, the total amount contributed by or through FAY-PAC to the Dole Committee was $6,500, of which only $1,500 was a direct contribution by FAY-PAC.

5/ Our research revealed no record of this contribution in the Dole Committee's Reports of Receipts and Disbursements.

12/02/87	Nathan Adler	$ 450
12/01/87	William Gladstone	$ 500
12/03/87	Jerome Goldman	$ 200
12/06/87	Bruce Greenwald	$ 300
11/27/87	Carl Harnick	$ 500
12/08/87	Thomas Hudgins	$1,000
12/02/87	Paul Kramer	$ 500
12/01/87	Bryant McCarthy	$ 450
12/03/87	William McNamara	$ 500
11/29/87	Richard Young	$ 600

Tab 6. On December 9, 1987, FAY-PAC drew two checks totaling $5,000 payable to the Dole Committee (Tab 7). Mr. Liggio, treasurer of FAY-PAC, sent the checks on December 11, 1987 to the Dole Committee, in care of Robert Greenhill, a Dole Committee representative, under cover of a letter stating that $4,000 of the $5,000 contribution represented earmarked contributions for the Dole Committee from the following nine individuals:

Nathan Adler	$ 450
William Gladstone	$ 500
Jerome Goldman	$ 200
Bruce Greenwald	$ 300
Carl Harnick	$ 500
Thomas Hudgins	$1,000
Bryant McCarthy	$ 450
William McNamara	$ 500
Richard Young	$ 600

Tab 8. In fact, however, these enumerated contributions totaled $4,500 -- not $4,000 as stated in the body of the letter -- and the $500 contribution by Paul Kramer to FAY-PAC and earmarked for the Dole Committee was inadvertently omitted. Compare Tab 6 with Tab 8. The Dole Committee disclosed the $1,000 and $4,000 contributions in its 1987 Year-end Report of Receipts and Disbursements. Tab 11.[6/]

6/ The Dole Committee apparently was not informed by Mr. Greenhill that a substantial portion of the funds included in the FAY-PAC checks represented amounts earmarked by individual contributors. As a result, the Dole Committee reported FAY-PAC as the sole contributor of all $5,000. Tab 11. Of course, had FAY-PAC made this

[FOOTNOTE CONTINUED ON NEXT PAGE]

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On February 1, 1988, FAY-PAC filed its 1987 Year End Report of Receipts and Disbursements disclosing the following contributions from ten individuals totaling $8,000 as earmarked contributions, but without indicating for whom the contributions were earmarked:

$ 900	Nathan Adler
$1,000	William Gladstone
$ 200	Jerome Goldman
$ 300	Bruce Greenwald
$1,000	Carl Harnick
$1,000	Thomas Hudgins
$ 500	Paul Kramer
$ 900	Bryant McCarthy
$1,000	William McNamara
$1,200	Richard Young

Tab 12.7/ In the same report, FAY-PAC disclosed a disbursement to the Dole Committee of $5,000, including earmarked funds totaling $4,500.

[FOOTNOTE CONTINUED FROM PREVIOUS PAGE]

$5,000 contribution from funds other than funds earmarked by individual contributors for the Dole Committee, FAY-PAC would have made $2,000 in excessive contributions to the Dole Committee. On January 20, 1988, the Dole Committee, erroneously believing that FAY-PAC had made an excessive contribution, refunded $1,000 to FAY-PAC by check dated December 31, 1987. Tab 10. The Dole Committee disclosed this transaction by footnoting its entry for FAY-PAC's aggregate year-to-date total on its 1987 Year-end Report of Receipts and Disbursements. Tab 11.

Our research revealed no disclosure of this refund by FAY-PAC in its 1987 or 1988 Reports of Receipts and Disbursements.

7/ These earmarked contributions totalled $8,000 because they also included $3,500 earmarked for the George Bush presidential campaign. Tab 16. Unfortunately, in preparing its 1987 Year End Report of Receipts and Disbursements FAY-PAC still failed to recognize that Mr. Kramer had in fact contributed a total of $1,000, of which $500 was earmarked for Dole and $500 for Bush. This one error, and the failure by the Dole Committee to recognize certain of the contributions from FAY-PAC as derived from individual contributions earmarked for the Dole Committee, have contributed to much of the confusion on this matter.

9304095241 9

In response to a Request for Additional Information by the FEC in late February 1988 (Tab 14), FAY-PAC submitted an amended 1987 Year End Report of Receipts and Disbursements under cover of a letter dated March 15, 1988. Tab 16.[8/] The amended 1987 Year End Report contained notations for the earmarked contributions from the relevant ten individuals, as follows:

$ 450	Nathan Adler for Dole
$ 450	Nathan Adler for Bush
$ 500	William Gladstone for Dole
$ 500	William Gladstone for Bush
$ 200	Jerome Goldman for Dole
$ 300	Bruce Greenwald for Dole
$ 500	Carl Harnick for Dole
$ 500	Carl Harnick for Bush
$1,000	Thomas Hudgins for Dole
$ 500	Paul Kramer for Bush
$ 450	Bryant McCarthy for Dole
$ 450	Bryant McCarthy for Bush
$ 500	William McNamara for Dole
$ 500	William McNamara for Bush
$ 600	Richard Young for Dole
$ 600	Richard Young for Bush

Tab 16. These contributions were properly reported as receipts (with notations for whom the contributions were earmarked) and as disbursements (as "Memo Entries" under the appropriate contribution by FAY-PAC to the designated candidate). However, the $4,500 of earmarked contributions to the Dole Committee represented by the foregoing list still inadvertently omitted the $500 of Paul Kramer's contribution that was earmarked for the Dole Committee.[9/]

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8/ Shortly after the letter was sent, but before it was received by the FEC, the Commission renewed its request by letter dated March 17, 1988. Tab 17.

9/ As can be seen in the Amended 1987 Year End Report, FAY-PAC correctly disclosed that Mr. Kramer had contributed a total of $1,000 and that $500 of that amount was earmarked for the Bush campaign. FAY-PAC failed to recognize again, however, that the remaining $500 contributed by Mr. Kramer had been earmarked for the Dole Committee. Tab 6.

On February 19, 1988, FAY-PAC attempted to correct the perceived $500 discrepancy between the $4,500 it disclosed as contributions earmarked for the Dole Committee in its 1987 Year End Report and the $4,000 noted by Mr. Liggio in his December 11, 1987 letter to Robert Greenhill as the total of earmarked funds for the Dole Committee, by drawing a $500 FAY-PAC check for the Dole Committee. FAY-PAC sent the $500 check to the Dole Committee with a note indicating that the $500 was for the remaining balance due of earmarked funds received by FAY-PAC. Tab 13. FAY-PAC disclosed this $500 contribution in its 1988 March Monthly Report of Receipts and Disbursements, but failed to designate the contribution as one derived from funds earmarked for Dole. Tab 15.[10/]

Thus, as of March 1988, FAY-PAC had contributed to the Dole Committee $4,500 derived from funds earmarked for Dole and which were properly identified to the Dole Committee and the FEC[11/] as such. As of March 1988, FAY-PAC had also contributed what it believed to be $3,000 of its own funds -- $500 of which was actually attributable to a $500 contribution by Paul Kramer earmarked for the Dole Committee (an error which still had not been noticed), and $1,000 of which appears to have been returned to FAY-PAC by the Dole Committee as noted above.

DISCUSSION

Subsection 441a(a)(2)(A) of the Act provides that, "[n]o multi-candidate political committee shall make

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10/ One possible explanation for this omission is that $4,500 in earmarked funds already had been reported to the FEC, which FAY-PAC (having still failed to notice that Mr. Kramer had earmarked $500 for the Dole Committee) presumably believed to be the full amount earmarked.

Our research revealed no report to the FEC by the Dole Committee of this contribution.

11/ The one exception is the February 1988 contribution which was identified to the Dole Committee as part of the earmarked funds previously identified in the letter to Mr. Greenhill dated December 11, 1987, but which inadvertently was not identified as earmarked funds in FAY-PAC's 1988 March Monthly Report of Receipts and Disbursements. See footnote 10 above.

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contributions . . . to any candidate and his authorized political committees with respect to any election for Federal office which, in the aggregate, exceed $5,000." 2 U.S.C. § 441a(a)(2)(A)(1991). FAY-PAC made no contributions to the Dole Committee in excess of $5,000 and thus did not violate Subsection 441a(a)(2)(A) of the Act. Although FAY-PAC concedes that it drew an aggregate of $7,500 in checks payable to the Dole Committee, $5,000 of that amount consisted of contributions received by FAY-PAC from individuals and earmarked for Dole.

Earmarked contributions receive special treatment under the Act and the relevant Commission regulations. 2 U.S.C. §§ 431 et seq.; 11 CFR part 110.6. Subsection 441a(a)(8) of the Act provides that "[f]or purposes of the limitations imposed by this section, all contributions made by a person, either directly or indirectly, on behalf of a particular candidate, including contributions which are in any way earmarked or otherwise directed through an intermediary or conduit to such candidate, shall be treated as contributions from such person to such candidate." 2 U.S.C. § 441a(a)(8)(1988). Therefore, under this subsection, the contributions totalling $5,000 by FAY-PAC to the Dole Committee that resulted from contributions by individuals that were earmarked for Dole, were contributions by the original donors to the Dole Committee.

Moreover, the Commission regulations make it clear that the earmarked funds are not to be treated as contributions by FAY-PAC: "A conduit or intermediary's contribution limits are not affected by passing on earmarked contributions, except where the conduit exercises any direction or control over the choice of the recipient candidate." 11 CFR 110.6(d)(1)(1987). Based on the facts presented as supported by the attached contemporaneous documents, FAY-PAC drew checks payable to the Dole Committee as directed by the individual contributors, for the exact amount of the contributions received from the individual contributors that were earmarked for Dole, and did so within two weeks of receipt of the first such earmarked contribution.[12/] Therefore, no fact exists to

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12/ As noted above, a total of $5,000 in contributions earmarked for Dole was received by FAY-PAC, and FAY-PAC in turn drew checks payable to the Dole Committee totalling $5,000 in December, 1987. Because of the ongoing error with respect to Mr. Kramer's contribution, however, only $4,500 of that contribution was reported to the FEC and to the Dole Committee as earmarked.

9304095242 2

suggest that FAY-PAC exercised direction or control over the earmarked funds. In addition, by Affidavit dated January 27, 1992, Carl D. Liggio, the treasurer of FAY-PAC from its inception in 1978 until its termination in 1990, states that at no time did he or FAY-PAC "exercise any direction or control over the choice of the recipient candidate in connection" with the contributions received by FAY-PAC and earmarked for Dole. Tab 20. Accordingly FAY-PAC should not be treated as the contributor of the $5,000 contribution to the Dole Committee and such amount should not count against FAY-PAC's contribution limitation.

Therefore, of the $7,500 contributed to the Dole Committee through checks drawn on FAY-PAC's account[13/], $5,000 were attributable to earmarked funds and are treated as contributions made by the contributing individuals and not by FAY-PAC: $450 by Nathan Adler, $500 by William Gladstone, $200 by Jerome Goldman, $300 by Bruce Greenwald, $500 by Carl Harnick, $1,000 by Thomas Hudgins, $450 by Bryant McCarthy, $500 by William McNamara, $600 by Richard Young, and $500 by Paul Kramer. Even if the Commission presumes that the $500 contributed to FAY-PAC by Mr. Kramer, but designated for Dole failed to constitute an earmarked contribution due to FAY-PAC's inadvertent failure to report the contribution as earmarked funds, the aggregate amount of contributions to the Dole Committee by FAY-PAC was still well below the $5,000 permitted by applicable law. Therefore, because neither FAY-PAC nor any other political committee sponsored by partners of Arthur Young & Company (including the respondent EYLA-PAC) violated 2 U.S.C. § 441a(a)(2)(A) based on the facts alleged by the FEC in MUR 3309, no further action should be taken in connection with MUR 3309 or the facts alleged therein.

Respectfully submitted,

R. Todd Johnson

13/ This amount decreases to $6,500 if the $1,000 refund from the Dole Committee is applied.

2304095243

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
92 JAN 31 PM 3:42

Attachments to
Submission in Response to
Federal Election Commission
MUR 3309

January 31, 1992

93040955244

R. Todd Johnson
Jones, Day, Reavis & Pogue
1450 G Street, N.W.
Washington, D.C. 20005
(202) 879-4640

6230k

Attachments to Submission in Response
to Federal Election Commission MUR 3309

January 31, 1992

Table of Contents

Tab	Description
1	FAY-PAC check for $1,000 dated May 21, 1987, payable to the Dole Committee
2	Relevant pages from FAY-PAC's 1987 June Monthly Report of Receipts and Disbursements
3	Relevant pages from the Dole Committee's 1987 July 15 Quarterly Report of Receipts and Disbursements
4	FAY-PAC check for $1,000 dated July 23, 1987, payable to the Dole Committee
5	Relevant pages from FAY-PAC's 1987 August Monthly Report of Receipts and Disbursements
6	Checks from ten individuals to FAY-PAC dated between November 27, 1987 and December 8, 1987
7	FAY-PAC checks for $1,000 and $4,000 each dated December 9, 1987, payable to the Dole Committee
8	Letter dated December 11, 1987 from Carl D. Liggio, treasurer of FAY-PAC, to Robert F. Greenhill, a representative of the Dole Committee
9	Letter dated December 17, 1987 from Carl D. Liggio, treasurer of FAY-PAC, to Ms. Tammy Rollins, Reports Analyst, FEC
10	Letter dated January 20, 1988 from the Dole Committee to FAY-PAC, together with a Dole Committee check for $1,000 dated December 31, 1987, payable to FAY-PAC
11	Relevant pages from the Dole Committee's 1987 Year-end Report of Receipts and Disbursements

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12	Relevant pages from FAY-PAC's 1987 Year End Report of Receipts and Disbursements
13	FAY-PAC check for $500 dated February 19, 1988, payable to the Dole Committee together with a note to Ms. Shepard
14	FEC Request for Additional Information dated February 23, 1988, regarding FAY-PAC's Year End Report (12/1/87 - 12/31/87)
15	Relevant pages from FAY-PAC's 1988 March Monthly Report of Receipts and Disbursements
16	Letter dated March 15, 1988 from FAY-PAC to the FEC, together with an amended 1987 Year End Report of Receipts and Disbursements
17	FEC's Second Request for Additional Information dated March 17, 1988, regarding the Year End Report (12/1/87 - 12/31/87)
18	Letter dated November 21, 1991 from John Warren McGarry, Chairman, FEC, to Harry D. Slaughter, treasurer, EYLA-PAC
19	Letter dated January 10, 1992 from Harry D. Slaughter III, treasurer, EYLA-PAC, to Mr. Jeffrey Long, FEC
20	Affidavit of Carl D. Liggio dated January 27, 1992

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LAST NAME: Arthur Young PAC Check No. 501

SALUTATION: _____

ACKNOWLEDGMENT TYPE: NA

Other Required Information _____

_____

_____ 1000

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BANKERS TRUST COMPANY
NEW YORK, N. Y.

ARTHUR YOUNG & COMPANY
POLITICAL ACTION COMMITTEE
277 PARK AVENUE • NEW YORK, N.Y. 10017

1 No. 501

1-103
210

DATE May 21, 1987 $1,000.00

PAY ONE THOUSAND DOLLARS ---------- DOLLARS

TO THE ORDER OF Dole for President Exploratory Cmte.

ARTHUR YOUNG & COMPANY
POLITICAL ACTION COMMITTEE

Carl D Liggio
AUTHORIZED SIGNATURE

01 AD KS

⑈000501⑈ ⑆021001033⑆ 001-500269⑈

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REPORT OF RECEIPTS AND DISBURSEMENTS
For a Political Committee Other Than an Authorized Committee

(Summary Page)

1. Name of Committee (In Full)

ARTHUR YOUNG + COMPANY POLITICAL ACTION COMMITTEE

Address (Number and Street)

277 PARK AVENUE

City, State and ZIP Code

NEW YORK, NY 10172

☐ Check here if address is different than previously reported.

2. FEC Identification Number

C-00035492

3. ☐ This committee qualified as a multicandidate committee during this Reporting Period on _____ (Date)

4. TYPE OF REPORT (Check appropriate boxes)

(a) ☐ April 15 Quarterly Report ☐ October 15 Quarterly Report
☐ July 15 Quarterly Report ☐ January 31 Year End Report
☐ July 31 Mid Year Report (Non-Election Year Only)
☑ Monthly Report for MAY 1987
☐ 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

(b) Is this Report an Amendment?
☐ YES ☐ NO

SUMMARY	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period MAY 1 through MAY 31, 1987		
6. (a) Cash on hand January 1, 1987		$ 44814.85
(b) Cash on Hand at Beginning of Reporting Period	$ 56630.07	
(c) Total Receipts (from Line 18)	$ 450.07	$ 22877.71
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	$ 57080.14	$ 6769256
7. Total Disbursements (from Line 28)	$ 4552.07	$ 15164.49
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	$ 52528.07	$ 52528.07
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.

Carl D. Liggio
Type or Print Name of Treasurer

Carl D. Liggio
SIGNATURE OF TREASURER

6/19/87
Date

For further information contact:
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 FEC FORM 3 and FEC FORM 3s are obsolete and should no longer be used.

FEC FORM 3X (3/80)

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DETAILED SUMMARY PAGE
of Receipts and Disbursements
(Page 2, FEC FORM 3X)

Name of Committee (in Full): ARTHUR YOUNG & CO. POLITICAL ACTION COMMITTEE

Report Covering the Period: From: MAY 1 To: MAY 31 1987

	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date	
I. RECEIPTS			
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees. (Memo Entry Unitemized $ 188.00)	450.72	22725.21	11(a)
(b) Political Party Committees			11(b)
(c) Other Political Committees			11(c)
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b) and 11(c))	450.72	22725.21	11(d)
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES		152.50	12
13. ALL LOANS RECEIVED			13
14. LOAN REPAYMENTS RECEIVED			14
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)			15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES			16
17. OTHER RECEIPTS (Dividends, Interest, etc.)			17
18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)	450.72	22877.71	18
II. DISBURSEMENTS			
19. OPERATING EXPENDITURES	52.72	414.49	19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES			20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	4500.00	14750.00	21
22. INDEPENDENT EXPENDITURES (use Schedule E)			22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. § 441 a(d)) (Use Schedule F)			23
24. LOAN REPAYMENTS MADE			24
25. LOANS MADE			25
26. REFUNDS OF CONTRIBUTIONS TO			
(a) Individuals/Persons Other Than Political Committees			26(a)
(b) Political Party Committees			26(b)
(c) Other Political Committees			26(c)
(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c))			26(d)
27. OTHER DISBURSEMENTS			27
28. TOTAL DISBURSEMENTS (add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	4552.72	15164.49	28
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)	450.72	22877.71	29
30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)			30
31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)	450.72	22877.71	31
32. TOTAL OPERATING EXPENDITURES from Line 19	52.72	414.49	32
33. OFFSETS TO OPERATING EXPENDITURES from Line 15			33
34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)	52.72	414.49	34

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SCHEDULE B — ITEMIZED DISBURSEMENTS

Use separate schedule(s) for each category of the Detailed Summary Page

PAGE 1 OF 1

FOR LINE NUMBER 21

Any information copied from such Reports and 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.

NAME OF COMMITTEE (in Full)

ARTHUR YOUNG & COMPANY POLITICAL ACTION COMMITTEE

	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. Full Name, Mailing Address and ZIP Code Arlen Specter for US Senate 831 Grant Bldg. Pittsburgh, PA 15219	US. Senate Cmgn ID # C00125880 Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	5/31/87	$ 500.00
B. Full Name, Mailing Address and ZIP Code George Bush for President PO Box 1188 Houston, Texas 77251-1188	Purpose of Disbursement Bush for President Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	5/31/87	$ 3000.00
C. Full Name, Mailing Address and ZIP Code Dole for President Exploratory Cmte 1828 L Street NW Ste 805 Washington DC 20036	Purpose of Disbursement Dole for President Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	5/31/87	$ 1000.00
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional)	
TOTAL This Period (last page this line number only)	$ 4500.00

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9 3 0 4 0 9 5 2 4 3 3

25/0540

FEC Form 3P, Page 1
Federal Election Commission
1328 K Street, N.W.
Washington, D.C. 20463

REPORT OF RECEIPTS AND DISBURSEMENTS BY AN AUTHORIZED COMMITTEE OF A CANDIDATE FOR THE OFFICE OF PRESIDENT

RECEIVED : THE FEC
HAND DELIVERED
87 JUL 15 PM 2:28

NOTE: *This report is to be used by an authorized committee of a candidate seeking nomination or election to the Office of President or Vice President of the United States whether or not public funds are used.*

1. NAME OF COMMITTEE IN FULL
DOLE FOR PRESIDENT EXPLORATORY COMMITTEE, INC.

2. IDENTIFICATION NUMBER
C00213850

ADDRESS (Number and Street)
1828 L Street, N.W. Suite 805

CITY: Washington | STATE: D.C. | ZIP CODE: 20036 | ☐ Check if name or address is changed

3. IS THIS REPORT OF RECEIPTS AND DISBURSEMENTS FOR:
☒ Primary ☐ General

4. TYPE OF REPORT ("X" appropriate box and complete, if applicable)
☐ Amendment for (Report) _____
☐ Monthly Report (month) _____
☐ April 15 Quarterly Report
☐ July 15 Quarterly Report
☐ October 15 Quarterly Report
☐ January 31 Year-end Report
☐ Termination Report

☐ Twelfth Day Before Election
☐ Thirtieth Day After Election
TYPE OF ELECTION
STATE | ELECTION DATE

COMMITTEE SUMMARY OF RECEIPTS AND DISBURSEMENTS

5. COVERING PERIOD: FROM APRIL 1, 1987 THROUGH JUNE 30, 1987

SUMMARY	6. CASH ON HAND AT BEGINNING OF THE REPORTING PERIOD	208,742.71
	7. TOTAL RECEIPTS THIS PERIOD (From Line 22 Column A)	3,345,878.28
	8. SUBTOTAL (Add Line 6 and 7)	3,554,621.09
	9. TOTAL DISBURSEMENTS THIS PERIOD (From Line 30 Column A)	1,869,118.85
	10. CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (Subtract Line 9 from 8)	1,685,502.24
	11. DEBTS AND OBLIGATIONS OWED TO THE COMMITTEE (Itemize All on Schedule C or Schedule D)	-0-
	12. DEBTS AND OBLIGATIONS OWED BY THE COMMITTEE (Itemize All on Schedule C or Schedule D)	347,351.41
	13. EXPENDITURES SUBJECT TO LIMITATION (From FEC Form 3P, Page 4)	2,148,790.64
NET YEAR-TO-DATE CONTRIBUTIONS AND EXPENDITURES	14. NET CONTRIBUTIONS (Other than Loans) (Subtract Line 28d Column B from 17e Column B)	3,679,445.15
	15. NET OPERATING EXPENDITURES (Subtract Line 20a Column B from 23 Column B)	2,148,790.64

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

TYPE OR PRINT NAME OF TREASURER
JAMES L. HAGEN, Assistant Treasurer

SIGNATURE OF TREASURER
James L. Hagen

DATE
July 15, 1987

For further information contact
Federal Election Commission
Toll Free 800-424-9530
Local 523-4068

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 FEC Form 3P are obsolete and should no longer be used.

FEC Form 3P (7-85)

H7ID51750 930409524334

DETAILED SUMMARY OF RECEIPTS AND DISBURSEMENTS
(Page 2, FEC FORM 3P)

NAME OF COMMITTEE (in Full)
BUSH FOR PRESIDENT EXPLORATORY COMMITTEE, INC.

REPORT COVERING THE PERIOD
From 4/1/87 Through 6/30/87

	COLUMN A Total This Period	COLUMN B Calendar Year to Date
I. RECEIPTS		
16 FEDERAL FUNDS (Itemize on Schedule A-P)		
17 CONTRIBUTIONS (other than loans) FROM:		
(a) Individuals/Persons Other Than Political Committees	2,942,930.43	3,541,556.43
(b) Political Party Committees	152,509.72	170,509.72
(c) Other Political Committees	3,095,440.15	3,716,216.15
(d) The Candidate	250,000.00	255,913.87
(e) TOTAL CONTRIBUTIONS (other than loans) (Add 17(a), 17(b), 17(c) and 17(d))		
18 TRANSFERS FROM OTHER AUTHORIZED COMMITTEES		
19 LOANS RECEIVED		
(a) Loans Received From or Guaranteed by Candidate		
(b) Other Loans		
(c) TOTAL LOANS (Add 19(a) and 19(b))	438.23	438.23
20 OFFSETS TO EXPENDITURES (Refunds, Rebates, etc.)		
(a) Operating		
(b) Fundraising		
(c) Legal and Accounting	438.23	438.23
(d) TOTAL OFFSETS TO EXPENDITURES (Add 20(a), 20(b) and 20(c))		
21 OTHER RECEIPTS (Dividends, Interest, etc.)		
22 TOTAL RECEIPTS (Add 16, 17(e), 18, 19(c), 20(d) and 21)	3,345,878.38	3,972,268.53
II. DISBURSEMENTS		
23 OPERATING EXPENDITURES	1,757,474.95	2,149,228.82
24 TRANSFERS TO OTHER AUTHORIZED COMMITTEES		
25 FUNDRAISING DISBURSEMENTS	75,822.90	100,515.14
26 LEGAL AND ACCOUNTING DISBURSEMENTS		
27 REPAYMENTS MADE		
(a) Repayments of Loans Made or Guaranteed by Candidate		
(b) Other Repayments	30,522.00	31,...
(c) TOTAL REPAYMENTS MADE (Add 27(a) and 27(b))		
28 [illegible]	5,000.00	5,...
(a) [illegible]	34,...	...
(b) [illegible]		
(c) [illegible]		
(d) [illegible]		
29 [illegible]		
30 [illegible]		
31 [illegible]		
32 [illegible]		
33 [illegible]		
34 [illegible]		

SCHEDULE A-C ITEMIZED RECEIPTS
NAME OF COMMITTEE - BOLD
PERIOD RUN 04/01/87 THRU 06/30/87

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.

NAME,ADDRESS,CITY,STATE,ZIP	EMPLOYER AND OCCUPATION	RECEIPT INFO DATE	AMOUNT
AETNA LIFE AND CASUALTY PAC INFORMATION REQUESTED (X)PRI ( )GEN ( )OTHER:	AGGREGATE YTD 500.00	06/22/87	500.00
AMERICAN AIRLINES PAC PO BOX 61944 DFW AIRPORT TX 75261 (X)PRI ( )GEN ( )OTHER:	AGGREGATE YTD 1,000.00	06/30/87	1,000.00
AMERICAN FAMILY PAC PO BOX 1480 COLUMBUS GA 31902 (X)PRI ( )GEN ( )OTHER:	AGGREGATE YTD 5,000.00	06/30/87	5,000.00
ARCHER DANIELS MIDLAND PAC PO BOX 1470 DECATUR IL 62525 (X)PRI ( )GEN ( )OTHER:	AGGREGATE YTD 1,000.00	05/01/87	1,000.00
ARTHUR YOUNG & COMPANY PAC 277 PARK AVENUE NEW YORK NY 10017 (X)PRI ( )GEN ( )OTHER:	AGGREGATE YTD 1,000.00	06/03/87	1,000.00
AT & T PAC 550 MADISON AVE NEW YORK NY 10022 (X)PRI ( )GEN ( )OTHER:	AGGREGATE YTD 5,000.00	06/30/87	5,000.00
BAKE PAC SUITE 1004 1701 K ST NW WASHINGTON DC 20006 (X)PRI ( )GEN ( )OTHER:	AGGREGATE YTD 1,000.00	05/01/87	1,000.00

SUBTOTAL OF RECEIPTS THIS PAGE — RECEIPT AMOUNT 14,500.00

93004095524336

9304095 2437

ARTHUR [redacted].G & COMPANY POLITICAL ACTION CO[redacted]TTEE

ACCOUNT NUMBER	EMPLOYEE NUMBER	AMOUNT	CHECK NUMBER	DATE	VENDOR NUMBER	OFFICE NUMBER	DEPT NUMBER	INVOICE NUMBER	INVOICE DATE
1-4	5-8	9-17	19-24	26-31	33-36	37-38	40-41	42-47	48-53
		$1000.00	№ 504	7/23/87		86			

DESCRIPTION

Robert Dole for President

BANKERS TRUST COMPANY
NEW YORK, N. Y.

ARTHUR YOUNG & COMPANY
POLITICAL ACTION COMMITTEE
277 PARK AVENUE • NEW YORK, N.Y. 10017

№ 504

1-103
210

DATE July 23, 1987 $1,000.00

PAY ONE THOUSAND DOLLARS ---------- DOLLARS

TO THE ORDER OF Robert Dole for President
c/o John Miller
Providence Mutual Ins. Co.
1600 Market Street
Philadelphia, PA 19103

ARTHUR YOUNG & COMPANY
POLITICAL ACTION COMMITTEE

AUTHORIZED SIGNATURE

930 4095 2438

⑈000504⑈ ⑆021001033⑆ 001⑈500 26911⑈

9304095 2439

REPORT OF RECEIPTS AND DISBURSEMENTS
For Other Than An Authorized Committee
(Summary Page)

USE FEC MAILING LABEL OR TYPE OR PRINT

1. NAME OF COMMITTEE (in full)
ARTHUR YOUNG POLITICAL ACTION COMMITTEE

ADDRESS (number and street) ☐ Check if different than previously reported
277 PARK AVENUE

CITY, STATE and ZIP CODE
NEW YORK, NY 10172

2. FEC IDENTIFICATION NUMBER
C-00035492

3. ☐ This committee qualified as a multicandidate committee DURING THIS Reporting Period on _____ (date).

4. TYPE OF REPORT

(a) ☐ 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)
☐ Termination Report

Monthly Report Due On:
☐ February 20 ☐ June 20 ☐ October 20
☐ March 20 ☐ July 20 ☐ November 20
☐ April 20 ☒ August 20 ☐ December 20
☐ May 20 ☐ September 20 ☐ January 31

☐ 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 _____

(b) Is this Report an Amendment? ☐ YES ☒ NO

SUMMARY

		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5.	Covering Period July 1 through July 31, 1987		
6.	(a) Cash on Hand January 1, 1987	- 1	$ 44814.85
	(b) Cash on Hand at Beginning of Reporting Period	$ 52688.32	
	(c) Total Receipts (from Line 18)	$ 193.72	$ 24584.40
	(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	$ 52882.04	$ 69399.25
7.	Total Disbursements (from Line 28)	$ 1552.72	$ 18069.93
8.	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	$ 51329.32	$ 51329.32
9.	Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	$	
10.	Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or 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.

Type or Print Name of Treasurer: CARL D. LIGGIO

Signature of Treasurer: Carl D Liggio

Date: 8/19/87

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g

FEC FORM 3X
(revised 4/87)

9304095244O

DETAILED SUMMARY PAGE

of Receipts and Disbursements
(Page 2, FEC FORM 3X)

Name of Committee (in full)	Report Covering the Period From:	To:	
ARTHUR YOUNG & CO POLITICAL ACTION COMMITTEE	July 1	July 31 1987	
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			
(i) Itemized (use Schedule A)	52.72	9672.68	11(i)
(ii) Unitemized	141.00	14759.22	11(ii)
(iii) Total of contributions from individuals	193.72	24431.90	11(iii)
(b) Political Party Committees			11(b)
(c) Other Political Committees (such as PACs)			11(c)
(d) TOTAL CONTRIBUTIONS (add 11(a)(iii), (b), and (c))	193.72	24431.90	11(d)
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES		152.50	12
13. ALL LOANS RECEIVED			13
14. LOAN REPAYMENTS RECEIVED			14
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)			15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES			16
17. OTHER RECEIPTS (Dividends, Interest, etc.)			17
18. TOTAL RECEIPTS (add 11(d), 12, 13, 14, 15, 16 and 17)	193.72	24584.40	18
II. DISBURSEMENTS			
19. OPERATING EXPENDITURES	52.72	519.93	19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES			20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	1500.00	17550.00	21
22. INDEPENDENT EXPENDITURES (use Schedule E)			22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 441a(d)) (use Schedule F)			23
24. LOAN REPAYMENTS MADE			24
25. LOANS MADE			25
26. REFUNDS OF CONTRIBUTIONS TO:			
(a) Individuals/Persons Other Than Political Committees			26(a)
(b) Political Party Committees			26(b)
(c) Other Political Committees (such as PACs)			26(c)
(d) TOTAL CONTRIBUTION REFUNDS (add 26(a), (b), and (c))			26(d)
27. OTHER DISBURSEMENTS			27
28. TOTAL DISBURSEMENTS (add 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	1552.72	18069.93	28
III. NET CONTRIBUTIONS/OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than loans)(from Line 11(d))	193.72	24431.90	29
30. TOTAL CONTRIBUTION REFUNDS (from Line 26(d))			30
31. NET CONTRIBUTIONS (other than loans)(subtract Line 30 from 29)	193.72	24431.90	31
32. TOTAL OPERATING EXPENDITURES (from Line 19)	52.72	519.93	32
33. OFFSETS TO OPERATING EXPENDITURES (from Line 15)			33
34. NET OPERATING EXPENDITURES (subtract Line 33 from 32)	52.72	519.93	34

P30409524 41

SCHEDULE B **ITEMIZED DISBURSEMENTS**

Use separate schedule(s) for each category of the Detailed Summary Page

PAGE 1 OF 1

FOR LINE NUMBER 21

Any information copied from such Reports and 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.

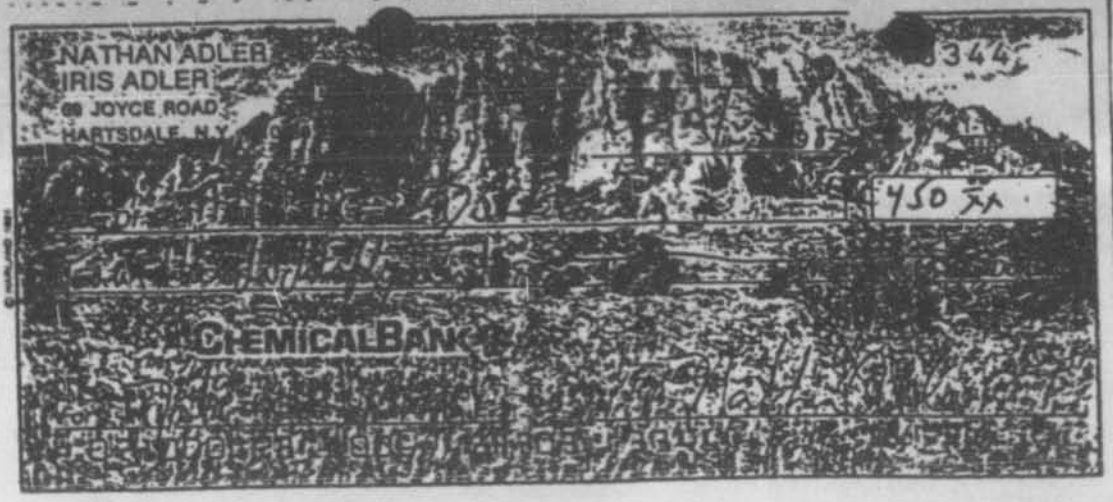
NAME OF COMMITTEE (in Full)

ARTHUR YOUNG + COMPANY POLITICAL ACTION COMMITTEE

A. Full Name, Mailing Address and ZIP Code Robert Dole for President c/o John Miller Providence Mutual Ins. Co. 1600 Market St. Philadelphia, Pa 19103	Purpose of Disbursement Robert Dole for President Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 7/21/87	Amount of Each Disbursement This Period $ 1000.00
B. Full Name, Mailing Address and ZIP Code Walgren for Congress Committee PO Box 70500 Washington, D.C. 20024	Purpose of Disbursement Walgren for Congress Committee - House Disbursement for: ☑ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 7/21/87	Amount of Each Disbursement This Period $ 500.00
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			$ 1500.00

93040952442

9 3 0 4 0 9 5 2 4 4 3


NATHAN ADLER
IRIS ADLER
69 JOYCE ROAD
HARTSDALE, N.Y.
344
450 00
CHEMICAL BANK

JEROME L. GOLDMAN
MARY M. GOLDMAN
34 MOUNTAIN AVE.
LARCHMONT, NY 10538

2942

December 3 1987

1-12/210

PAY TO THE ORDER OF AYPAC $ 200.00

Two Hundred & 00/xx DOLLARS

Irving Trust

Irving Trust Company
345 Park Avenue, New York, NY 10017

MEMO Dole

Jerome Goldman

THOMAS M. HUDGINS
ELIZABETH S. HUDGINS
12 RIDGECREST EAST
SCARSDALE, NY 10583

941

Dec. 8 1987

50-1019/210

PAY TO THE ORDER OF AYPAC $ 1000.00

One thousand and 00/100 DOLLARS

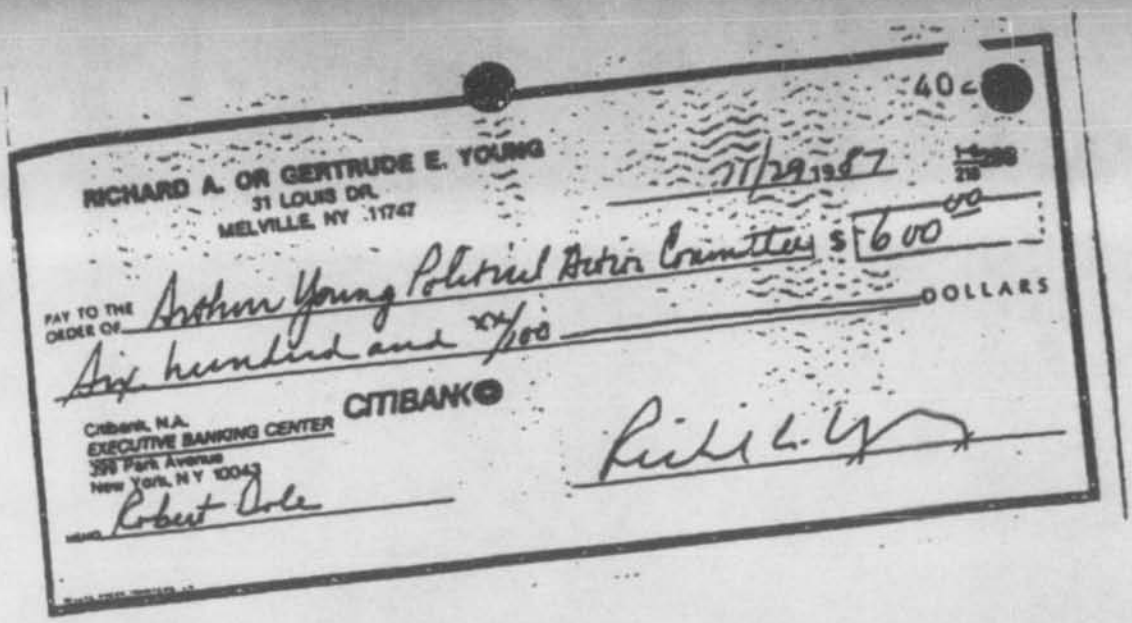
Irving Bank Corporation

Scarsdale National

Scarsdale National Bank and Trust Company
Scarsdale, NY 10583

MEMO R. Dole

930409524444



RICHARD A. OR GERTRUDE E. YOUNG
31 LOUIS DR.
MELVILLE, NY 11747

40

11/29 1987

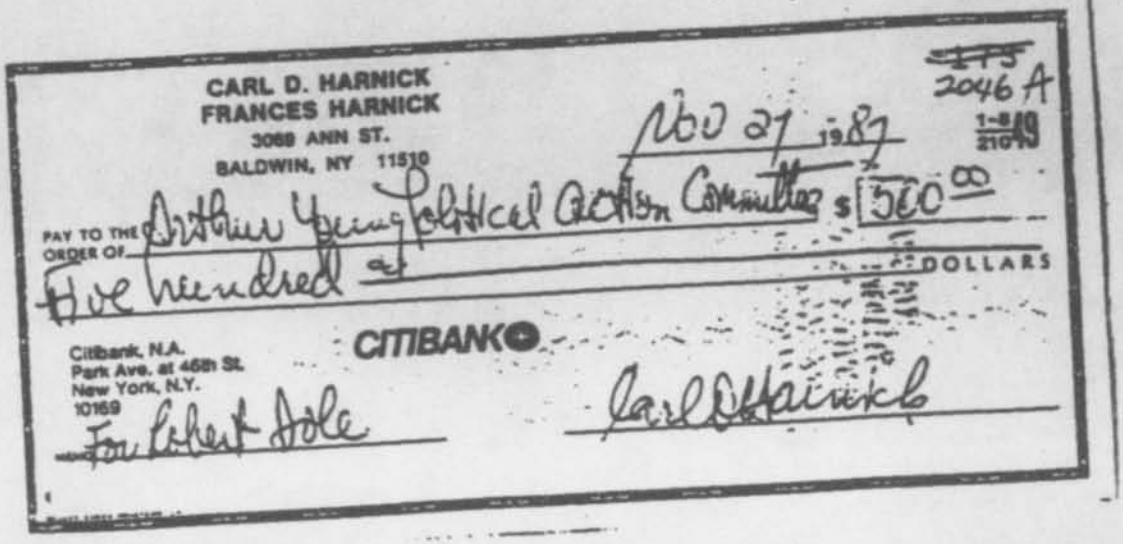
PAY TO THE ORDER OF Arthur Young Political Action Committee $ 600 00

Six hundred and xx/100 DOLLARS

CITIBANK

Citibank, N.A.
EXECUTIVE BANKING CENTER
399 Park Avenue
New York, N.Y. 10043

For Robert Dole



CARL D. HARNICK
FRANCES HARNICK
3069 ANN ST.
BALDWIN, NY 11510

2046 A

NOV 27 1987

PAY TO THE ORDER OF Arthur Young Political Action Committee $ 500 00

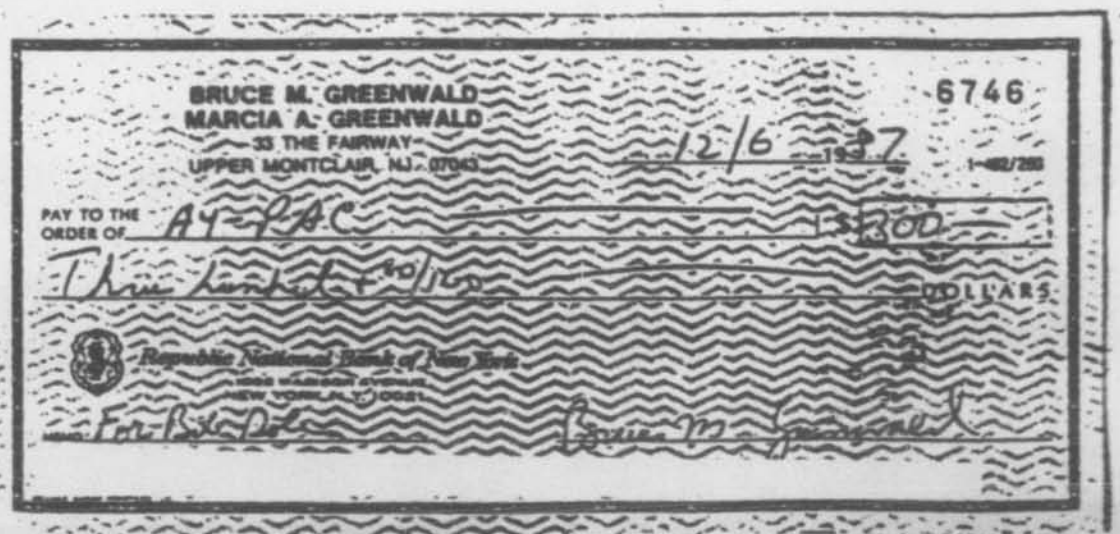
Five Hundred xx DOLLARS

CITIBANK

Citibank, N.A.
Park Ave. at 46th St.
New York, N.Y.
10169

For Robert Dole

Carl D Harnick



BRUCE M. GREENWALD
MARCIA A. GREENWALD
33 THE FAIRWAY
UPPER MONTCLAIR, NJ 07043

6746

12/6 1987

PAY TO THE ORDER OF AT-PAC $ 300

Three hundred xx/100 DOLLARS

Republic National Bank of New York
452 MADISON AVENUE
NEW YORK, N.Y. 10022

For Bob Dole

Bruce M Greenwald

930409552445

PAUL S. KR
MARILYN A. Kr
17 HUNTLEY ROAD
HOLMDEL, NJ 07733

December 19 87 1301

1-12
210

PAY TO THE ORDER OF Arthur Young Political Action Com $ 1,000 00

One Thousand and 00/100 DOLLARS

CHEMICAL BANK
277 Park Avenue
New York, N.Y. 10172

MEMO # 500 - BU 414 # 500 - DOLE

Paul S. Kramer

8532

BRYANT M. McCARTHY
112-30-2972

Dec. 1 19 87 1-12/219

Arthur Young Political Action Committee $ 150 00

one hundred fifty and 00/100 DOLLARS

CITIBANK

Dole

Bryant M. McCarthy

WILLIAM J. MC NAMARA
MARY C. MC NAMARA
20 CREST DRIVE
MIDLAND PARK, NJ 07432

December 19 87 1665

1-12
210

PAY TO THE ORDER OF Arthur Young Political Action Com $ 500 00

Five hundred and 00/100 DOLLARS

CHEMICAL BANK
277 Park Avenue
New York, N.Y. 10172

MEMO For Robert Dole

William J. McNamara

930409524446

William L. Gladstone

118

1-23/210

December 1, 1987

Pay to the order of Arthur Young Political Action Committee $500.00/100

Five hundred and 00/100 Dollars

Morgan Guaranty Trust Company
OF NEW YORK

Memo For Bob Dole

William L. Gladstone

930409552447

9304095 2448

ACCOUNT NUMBER	EMPLOYEE NUMBER	AMOUNT	CHECK NUMBER	DATE	VENDOR NUMBER	OFFICE NUMBER	DEPT NUMBER	INVOICE NUMBER	INVOICE DATE
1-4	5-8	9-17	19-24	26-31	33-36	38	40-41	42-47	48-53
		$1,000.00	№ 523	12/9/87		86			

DESCRIPTION

Bob Dole Campaign
As per letter dated 12/9/87

BANKERS TRUST COMPANY
NEW YORK, N. Y.

ARTHUR YOUNG & COMPANY
POLITICAL ACTION COMMITTEE
277 PARK AVENUE • NEW YORK, N.Y. 10017

№ 523

1-103
210

DATE December 9, 1987 $ 1,000.00

PAY ONE THOUSAND DOLLARS ---------- DOLLARS
TO THE ORDER OF

Bob Dole for President

ARTHUR YOUNG & COMPANY
POLITICAL ACTION COMMITTEE

Paul Thayer
AUTHORIZED SIGNATURE

⑈000523⑈ ⑆021001033⑆ 001⑈500269⑆⑆

930409524449

Sent by hand
12/14/87

ACCOUNT NUMBER	EMPLOYEE NUMBER	AMOUNT	CHECK NUMBER	DATE	VENDOR NUMBER	OFFICE NUMBER	DEPT. NUMBER	INVOICE NUMBER	INVOICE DATE
1-4	5-8	9-17	18-24	26-31	33-36	38	40-41	42-47	48-53
		$4,000.00	№ 522	12/9/87		86			

DESCRIPTION

Bob Dole Campaign
As per letter dated 12/9/87

BANKERS TRUST COMPANY
NEW YORK, N. Y.

ARTHUR YOUNG & COMPANY
POLITICAL ACTION COMMITTEE
277 PARK AVENUE • NEW YORK, N.Y. 10017

№ 522

1-103
210

DATE December 9, 1987 $ 4,000.00

PAY FOUR THOUSAND DOLLARS---------- DOLLARS

TO THE ORDER OF Bob Dole for President

ARTHUR YOUNG & COMPANY
POLITICAL ACTION COMMITTEE

AUTHORIZED SIGNATURE

⑈000522⑈ ⑆021001033⑆ 001⑉500269⑆⑈

930409524500

9304095245 1

ARTHUR YOUNG & COMPANY
POLITICAL ACTION COMMITTEE

277 PARK AVENUE
NEW YORK, N. Y. 10172
212-407-2367

December 11, 1987

Robert F. Greenhill
Morgan Stanley & Co. Incorporated
1251 Avenue of the Americas
New York, NY 10020

Dear Mr. Greenhill:

Enclosed is a check from the AYPAC in the amount of $5,000 for the Bob Dole campaign. This represents a $1,000 contribution from AYPAC. The $4,000 check represents earmarked contributions as follows:

Name and Address	
Thomas M. Hudgins 12 Ridgecrest East, Scarsdale, NY 10583	$1,000.00
Jerome L. Goldman 34 Mountain Ave., Larchmont, NY 10538	200.00
Nathan Adler 69 Joyce Road, Hartsdale, NY 10530	450.00
Bruce Greenwald 33 The Fairway, Upper Montclair, NJ 07043	300.00
William L. Gladstone 277 Park Avenue, New York, NY 10172	500.00
Carl D. Harnick 3069 Ann St., Baldwin, NY 11510	500.00

2304095524452

Richard A. Young 31 Louis Drive, Melville, NY 11747	600.00
William J. McNamara 20 Crest Drive, Midland Park NJ 07432	500.00
Bryant McCarthy 277 Park Avenue, New York, NY 10172	450.00

Each of the foregoing is a partner in Arthur Young & Company.

Very truly yours,

Carl D. Liggio
General Counsel

Enclosure

APPLESHARE 'A' FOLDER: CDL/DAK DOC: cdl.l.
FILE NAME: AYPAC
DAYBOOK

23040952453

[redacted]

277 Park Avenue
New York, New York 10172

FEDERAL ELECTION COMMISSION
87 DEC 21 AM 8:56

December 17, 1987

Ms. Tammy Rollins
Reports Analyst
Federal Election Commission
Reports Analysis Division
Washington, DC 20463

Dear Ms. Rollins:

In accordance with the telephone conversation you had with my secretary, this is to advise you that to avoid confusion, Arthur Young & Company Political Action Committee, originally registered as the Arthur Young Employees Political Action Committee, has changed its name to the "Federal Arthur Young & Company Political Action Committee".

Very truly yours,

Carl D. Liggio
Treasurer

[redacted]

93040952455

DOLE
PRESIDENT

1828 L Street, N.W. • Suite 805
Washington, D.C. 20036
(202) 223-9400
(TDD) (202) 223-9400

January 20, 1988

Arthur Young & Company
Political Action Committee
277 Park Avenue
New York, NY 10017

Dear Sirs:

Thank you very much for your $4,000.00 contribution to Dole for President.

However, Federal Law prohibits presidential campaigns from accepting contributions greater than $5,000.00 from multi candidate political action committees. As it appears that Arthur Young & Company Political Action Committee is a multi candidate PAC we have enclosed a refund of $1,000.00.

Senator Dole would, of course, gladly accept any additional personal contributions to the campaign. You can be sure that Senator Dole very much appreciates your contribution and hopes that you will continue your support of his presidential effort.

Yours truly,

Robert L Cleveland

Dole for President
Committee

Enclosure

Paid for by Dole for President Committee

23040952457

DOLE FOR PRESIDENT COMMITTEE, INC. Arthur Young & Company

DATE	ACCOUNT	DESCRIPTION	AMOUNT
12-31-87		Contribution Refund	$1000.00

DETACH AND RETAIN THIS STATEMENT
THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED ABOVE. IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT DESIRED.

DOLE FOR PRESIDENT COMMITTEE, INC.
1828 L STREET, N.W., SUITE 806
WASHINGTON, D.C. 20036

№ 4094

SIGNET BANK
Virginia

56-408/563 406

31 December 19 87

PAY One thousand dollars and no/100---------- DOLLARS $ 1000.00----

TO THE ORDER OF Arthur Young & Company
Political Acton Committee
277 Park Avenue
New York, NY 10017

James L. Hagen

⑈00004094⑈ ⑆056004089⑆ 652⑈0024669⑈

9 3 0 4 0 9 5 2 4 5 9

HAND DELIVERED

FEC Form 3P (Page 1)
Federal Election Commission
1328 K Street, N.W.
Washington, D.C. 20463

REPORT OF RECEIPTS AND DISBURSEMENTS BY AN AUTHORIZED COMMITTEE OF A CANDIDATE FOR THE OFFICE OF PRESIDENT

88 JAN 29 PM 4:47

NOTE: This report is to be used by an authorized committee of a candidate seeking nomination or election to the Office of President or Vice President of the United States whether or not public funds are used.

1. NAME OF COMMITTEE IN FULL: Dole for President Committee, Inc.	2. IDENTIFICATION NUMBER: C00213850
ADDRESS (Number and Street): 1828 L Street NW	3. IS THIS REPORT OF RECEIPTS AND DISBURSEMENTS FOR: [X] Primary [ ] General
CITY: Washington; STATE: DC; ZIP CODE: 20036; [ ] Check if name or address is changed	

4. TYPE OF REPORT ("X" appropriate box and complete if applicable)

- [ ] Amendment for (Report)
- [ ] Monthly Report (month)
- [ ] April 15 Quarterly Report
- [X] January 31 Year-end Report
- [ ] July 15 Quarterly Report
- [ ] Termination Report
- [ ] October 15 Quarterly Report
- [ ] Twelfth Day Before Election
- [ ] Thirtieth Day After Election

TYPE OF ELECTION

STATE | ELECTION DATE

COMMITTEE SUMMARY OF RECEIPTS AND DISBURSEMENTS

5. COVERING PERIOD: FROM October 1, 1987 THROUGH December 31,

SUMMARY	6. CASH ON HAND AT BEGINNING OF THE REPORTING PERIOD	2,[illegible]
	7. TOTAL RECEIPTS THIS PERIOD (From Line 22 Column A)	6,[illegible]
	8. SUBTOTAL (Add Line 6 and 7)	8,567,014.61
	9. TOTAL DISBURSEMENTS THIS PERIOD (From Line 30 Column A)	6,358,331.78
	10. CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (Subtract Line 9 from 8)	2,208,682.83
	11. DEBTS AND OBLIGATIONS OWED TO THE COMMITTEE (Itemize All on Schedule C or Schedule D)	4,415,252.34
	12. DEBTS AND OBLIGATIONS OWED BY THE COMMITTEE (Itemize All on Schedule C or Schedule D)	973,371.22
	13. EXPENDITURES SUBJECT TO LIMITATION (From FEC Form 3P, Page 4)	9,482,714.16
NET YEAR-TO-DATE CONTRIBUTIONS AND EXPENDITURES	14. NET CONTRIBUTIONS (Other than Loans) (Subtract Line 28d Column B from 17e Column B)	13,832,273.98
	15. NET OPERATING EXPENDITURES (Subtract Line 20a Column B from 23 Column B)	9,482,714.16

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

TYPED OR PRINTED NAME OF TREASURER: James L. Hagen, Assistant Treasurer

SIGNATURE OF TREASURER: James L. Hagen | DATE: January 29, 1988

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 FEC Form 3P are obsolete and should no longer be used.

For further information, contact:
Federal Election Commission
Toll Free 800-424-9530
Local 523-4068

FEC Form 3P (2/83)

23040952460

DETAILED SUMMARY OF RECEIPTS AND DISBURSEMENTS
(Page 2, FEC FORM 3P)

NAME OF COMMITTEE
Bush for President Committee, Inc.

REPORT COVERING THE PERIOD
From 10/1/87 Through 12/31/87

	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date	
I RECEIPTS			
16 FEDERAL FUNDS (Schedule A-P)			16
17 CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees	6,040,428.14	13,403,724.24	17(a)
(b) Political Party Committees			17(b)
(c) Other Political Committees	304,606.78	640,441.81	17(c)
(d) The Candidate			17(d)
(e) TOTAL CONTRIBUTIONS (other than loans) (Add 17(a), 17(b), 17(c) and 17(d))	6,345,034.92	14,044,166.05	17(e)
18 TRANSFERS FROM OTHER AUTHORIZED COMMITTEES		255,913.87	18
19 LOANS RECEIVED:			
(a) Loans Received From or Guaranteed by Candidate			
(b) Other Loans			
(c) TOTAL LOANS (Add 19(a) and 19(b))			
20 OFFSETS TO EXPENDITURES (Refunds, Rebates, etc.):			
(a) Operating	7,158.01		
(b) Fundraising			
(c) Legal and Accounting			20(c)
(d) TOTAL OFFSETS TO EXPENDITURES (Add 20(a), 20(b) and 20(c))	7,158.01	9,042.27	20(d)
21 OTHER RECEIPTS (Dividends, Interest, etc.)			21
22 TOTAL RECEIPTS (Add 16, 17(e), 18, 19(c), 20(d) and 21)	6,352,192.93	14,309,122.19	22
II DISBURSEMENTS			
23 OPERATING EXPENDITURES	4,082,113.82	9,491,756.43	23
24 TRANSFERS TO OTHER AUTHORIZED COMMITTEES			24
25 FUNDRAISING DISBURSEMENTS	1,698,775.23	1,735,326.58	25
26 EXEMPT LEGAL AND ACCOUNTING DISBURSEMENTS	386,047.28	606,644.90	26
27 REPAYMENTS OF LOANS:			
(a) Repayments of Loans Made or Guaranteed by Candidate			27(a)
(b) Repayments of All Other Loans			27(b)
(c) TOTAL LOAN REPAYMENTS MADE (Add 27(a) and 27(b))			27(c)
28 REFUNDS OF CONTRIBUTIONS TO:			
(a) Individuals/Persons Other Than Political Committees	131,457.07	190,892.07	28(a)
(b) Political Party Committees			28(b)
(c) Other Political Committees	16,000.00	21,000.00	28(c)
(d) TOTAL CONTRIBUTION REFUNDS (Add 28(a), 28(b) and 28(c))	147,457.07	211,892.07	28(d)
29 OTHER DISBURSEMENTS	43,938.38	54,819.38	29
30 TOTAL DISBURSEMENTS (Add 23, 24, 25, 26, 27(c), 28(d) and 29)	6,358,331.78	12,100,439.36	30
III CONTRIBUTED ITEMS (Stock, Art Objects, Etc.)			
31 ITEMS ON HAND TO BE LIQUIDATED (Attach List)			31

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SCHEDULE A-P ITEMIZED RECEIPTS
NAME OF COMMITTEE - DOLE
PERIOD RUN 10/01/87 THRU 12 31 87

PAGE 3 OF 28
LINE NUMBER 11C

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.

NAME, ADDRESS, CITY, STATE, ZIP	EMPLOYER AND OCCUPATION	RECEIPT DATE	INFO AMOUNT
ARCO PAC [illegible] S Flower Street, Suite 3287 [illegible] Angeles, CA 90071 (X)PRI ( )GEN ( )OTHER:	INFORMATION REQUESTED AGGREGATE YTD $4,000.00	11/04/87	4,000.00
ARNOLD & PORTER POLT ACT COMM 1200 NEW HAMPSHIRE AVE NW WASHINGTON DC 20036 (X)PRI ( )GEN ( )OTHER:	INFORMATION REQUESTED AGGREGATE YTD 1,000.00	11/19/87	1,000.00
ARTHUR YOUNG & COMPANY POLITICAL ACTION COMMITTEE 277 PARK AVENUE NEW YORK NY 10017 (X)PRI ( )GEN ( )OTHER:	INFORMATION REQUESTED AGGREGATE YTD 5,000.00 *	12/23/87 12/23/87	1,000.00 4,000.00
ASIAN INDIAN ACTION COMMITTEE PO BOX 1430 HAVERTOWN PA 19083 (X)PRI ( )GEN ( )OTHER:	INFORMATION REQUESTED AGGREGATE YTD 1,000.00	11/04/87	1,000.00
AUTO DEALERS & DRIVERS FOR 153-12 HILLSIDE AVE FREE TRADE JAMAICA NY 11435 PAC (X)PRI ( )GEN ( )OTHER:	INFORMATION REQUESTED AGGREGATE YTD 5,000.00	11/20/87	5,000.00
BALTIMORE FEDERAL FINANCIAL [illegible] E [illegible]-hard Baltimore, Maryland 21201 (X)PRI ( )GEN ( )OTHER:	INFORMATION REQUESTED AGGREGATE YTD 200.00	11/20/87	200.00

SUBTOTAL OF RECEIPTS THIS PAGE RECEIPT AMOUNT 16,200.00

* $1000.00 Refunded 12-31-87

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REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee

(Summary Page)

USE FEC MAILING LABEL OR TYPE OR PRINT

1. NAME OF COMMITTEE (in full)
Federal
ARTHUR YOUNG POLITICAL ACTION COMMITTEE

ADDRESS (number and street) ☐ Check if different than previously reported
277 PARK AVENUE

CITY, STATE and ZIP CODE
NEW YORK, NY 10172

2. FEC IDENTIFICATION NUMBER
C-00035492

3. ☐ This committee qualified as a multicandidate committee DURING THIS Reporting Period on _____ (date).

4. TYPE OF REPORT

(a) ☐ 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)
☐ Termination Report

Monthly Report Due On:
☐ February 20 ☐ June 20 ☐ October 20
☐ March 20 ☐ July 20 ☐ November 20
☐ April 20 ☐ August 20 ☐ December 20
☐ May 20 ☐ September 20 ☑ January 31

☐ 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 _____

(b) Is this Report an Amendment? ☐ YES ☒ NO

SUMMARY

		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5.	Covering Period 12/1/87 through 12/31/87		
6. (a)	Cash on Hand January 1, 19 87	—	$ 44814.85
(b)	Cash on Hand at Beginning of Reporting Period	$ 51235.22	
(c)	Total Receipts (from Line 18)	$ 37312.77	$ 69864.69
(d)	Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	$ 88547.99	$ 114679.54
7.	Total Disbursements (from Line 28)	$ 18452.77	$ 44584.32
8.	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	$ 70095.22	$ 70095.22
9.	Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	$	
10.	Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or 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.

Type or Print Name of Treasurer
CARL D LIGGIO

Signature of Treasurer
Carl D Liggio

Date
2/1/88

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

FEC FORM 3X
(revised 4/87)

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DETAILED SUMMARY PAGE

of Receipts and Disbursements
(Page 2, FEC FORM 3X)

Name of Committee (in full)	Report Covering the Period From:	To:
ARTHUR YOUNG & CO POLITICAL ACTION COMMITTEE	12/1/87	12/31/87

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			
(i) Itemized (use Schedule A)	29725.00	41762.14	11
(ii) Unitemized	7526.25	27827.97	11
(iii) Total of contributions from individuals			11
(b) Political Party Committees			11
(c) Other Political Committees (such as PACs)			11
(d) TOTAL CONTRIBUTIONS (add 11(a)(iii), (b), and (c))	37251.25	69590.11	11
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES		152.50	12
13. ALL LOANS RECEIVED			13
14. LOAN REPAYMENTS RECEIVED			14
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	61.52	122.08	15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES			16
17. OTHER RECEIPTS (Dividends, Interest, etc.)			17
18. TOTAL RECEIPTS (add 11(d), 12, 13, 14, 15, 16 and 17)	37312.77	69864.69	18
II. DISBURSEMENTS			
19. OPERATING EXPENDITURES	61.52	843.07	19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES			20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	17850.00	43200.00	21
22. INDEPENDENT EXPENDITURES (use Schedule E)			22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 441a(d)) (use Schedule F)			23
24. LOAN REPAYMENTS MADE			24
25. LOANS MADE			25
26. REFUNDS OF CONTRIBUTIONS TO:			
(a) Individuals/Persons Other Than Political Committees	541.25	541.25	26
(b) Political Party Committees			26
(c) Other Political Committees (such as PACs)			26
(d) TOTAL CONTRIBUTION REFUNDS (add 26(a), (b), and (c))	541.25	541.25	26
27. OTHER DISBURSEMENTS			27
28. TOTAL DISBURSEMENTS (add 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	18452.77	44584.32	28
III. NET CONTRIBUTIONS/OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than loans)(from Line 11(d))	37251.25	69590.11	29
30. TOTAL CONTRIBUTION REFUNDS (from Line 26(d))	541.25	541.25	30
31. NET CONTRIBUTIONS (other than loans)(subtract Line 30 from 29)	36710.00	69048.86	31
32. TOTAL OPERATING EXPENDITURES (from Line 19)	61.52	843.07	32
33. OFFSETS TO OPERATING EXPENDITURES (from Line 15)	61.52	122.08	33
34. NET OPERATING EXPENDITURES (subtract Line 33 from 32)	-0-	720.99	34

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SCHEDULE A — ITEMIZED RECEIPTS

(Use separate schedule(s) for each category of the Detailed Summary Page)

PAGE 3 OF 11

FOR LINE NUMBER 11(a)i

Any information copied from such Reports and 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.

NAME OF COMMITTEE (in Full)

ARTHUR YOUNG & Co POLITICAL ACTION COMMITTEE

A. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation	Date (month, day, year)	Amount of Each Receipt this Period
Robert Burmester 28 Maplewood Dr. Darien, CT 06820 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Arthur Young & Co Occupation Self Employed Accountant Aggregate Year-to-Date > $ 500.-	12/31/87	$ 500.00
B. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation	Date (month, day, year)	Amount of Each Receipt this Period
Thomas A DeWinter 1605 St. Croix Cir. Minneapolis, MN 55422 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Arthur Young & Co Occupation Self Employed Accountant Aggregate Year-to-Date > $ 200.-	12/31/87	$ 200.00
C. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation	Date (month, day, year)	Amount of Each Receipt this Period
Lawrence Behm 154 Lambert Rd. New Canaan, CT 06840 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Arthur Young & Co Occupation Self Employed Accountant Aggregate Year-to-Date > $ 500.-	12/31/87	$ 500.00
D. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation	Date (month, day, year)	Amount of Each Receipt this Period
Jerome Goldman 34 Mountain Ave Larchmont, NY 10538 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Arthur Young & Co Occupation Self Employed Accountant Aggregate Year-to-Date > $ 200.-	12/31/87	$ 200.00 EAR MARKED CONTRIBUTION
E. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation	Date (month, day, year)	Amount of Each Receipt this Period
Nathan Alder 69 Joyce Road Hartsdale, NY 10530 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Arthur Young & Co Occupation Self Employed Accountant Aggregate Year-to-Date > $	12/31/87	$ 900.00 Earmarked Contribution
F. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation	Date (month, day, year)	Amount of Each Receipt this Period
Walter Wohlgemuth 110 S Mountain Ave Montclair, NJ 07042 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Arthur Young & Co Occupation Self Employed Accountant Aggregate Year-to-Date > $	12/31/87	$ 575.00 (Earmarked Contribution)
G. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation	Date (month, day, year)	Amount of Each Receipt this Period
Paul Kramer 17 Huntley Road Holmdel, NJ 07733 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Arthur Young & Co Occupation Self Employed Accountant Aggregate Year-to-Date > $	12/31/87	$1000.00 $500 - Earmarked Contribution

SUBTOTAL of Receipts This Page (optional)	$ 3875.00
TOTAL This Period (last page this line number only)	

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SCHEDULE A — ITEMIZED RECEIPTS

Separate schedule(s) for each category of the Detailed Summary Page | PAGE 3 OF 11 | FOR LINE NUMBER 11(a)i

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NAME OF COMMITTEE (in Full)
ARTHUR YOUNG & CO POLITICAL ACTION COMMITTEE

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Bryant McCarthy 515 North St. Greenwich, CT 06830	Arthur Young & Co Occupation Self employed accountant Aggregate Year-to-Date > $ 900-	12/2/87	$ 900.00 (Earmarked contribution)
Receipt For: ☐ Primary ☐ General ☐ Other (specify):			
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
William McNamara 20 Crest Drive Midland Park, NJ 07432	Arthur Young & Co Occupation Self employed accountant Aggregate Year-to-Date > $1000-	12/31/87	$ 1000.00 (Earmarked contribution)
Receipt For: ☐ Primary ☐ General ☐ Other (specify):			
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Richard Young 31 Louis Dr Melville NY 11747	Arthur Young & Co Occupation Self emp Employed Accountant Aggregate Year-to-Date > $1200-	12/31/87	$1200.00 (Earmarked contribution)
Receipt For: ☐ Primary ☐ General ☐ Other (specify):			
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Carl Hornick 3069 Ann St. Bardonia, NY 11510	Arthur Young & Co Occupation Self Employed Accountant Aggregate Year-to-Date > $1088-	12/31/87	$1000.00 (Earmarked contribution)
Receipt For: ☐ Primary ☐ General ☐ Other (specify):			
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Bruce Greenwald 38 The Fairway Upper Montclair, NJ 07043	Arthur Young & Co Occupation Self Employed Accountant Aggregate Year-to-Date > $ 300-	12/31/87	$300.00 (Earmarked contribution)
Receipt For: ☐ Primary ☐ General ☐ Other (specify):			
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Thomas Hudgins 12 Ridgewood East, Scarsdale, NY 10583	Arthur Young & Co Occupation Self employed Accountant Aggregate Year-to-Date > $1000-	12/31/87	$1000.00 (Earmarked contribution)
Receipt For: ☐ Primary ☐ General ☐ Other (specify):			
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Glen Sage 401 E 34th St. New York, NY 10016	Arthur Young & Co Occupation Self Employed Accountant Aggregate Year-to-Date > $ 320	12/31/87	$320.00
Receipt For: ☐ Primary ☐ General ☐ Other (specify):			

SUBTOTAL of Receipts This Page (optional)	$ 5720.00
TOTAL This Period (last page this line number only)	

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SCHEDULE A — ITEMIZED RECEIPTS

[redacted] separate schedule(s) for each category of the Detailed Summary Page

PAGE 5 OF 11

FOR LINE NUMBER 11(a) i

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NAME OF COMMITTEE (in Full)

ARTHUR YOUNG & CO POLITICAL ACTION COMMITTEE

A. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation	Date (month, day, year)	Amount of Each Receipt this Period
Jack Atchison 3619 N. 60th St. Scottsdale, AZ 85251 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Arthur Young & Co self employed accountant Aggregate Year-to-Date $ 200.-	12/31/87	$200.00
B. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation	Date (month, day, year)	Amount of Each Receipt this Period
John Erickson 277 Park Avenue New York, NY 10172 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Arthur Young & Co New York self employed accountant Aggregate Year-to-Date $ 200.-	12/31/87	$200.00
C. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation	Date (month, day, year)	Amount of Each Receipt this Period
John Goodwin Box 119 Dolington Rd Newtown, PA 18940 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Arthur Young & Co self employed accountant Aggregate Year-to-Date $ 250.-	12/31/87	$250.00
D. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation	Date (month, day, year)	Amount of Each Receipt this Period
William Gladstone 5 knollwood Dr. Larchmont NY 10538 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Arthur Young & Co self employed accountant Aggregate Year-to-Date $ 1000.-	12/31/87	$1000.00 (earmarked contributions)
E. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation	Date (month, day, year)	Amount of Each Receipt this Period
Jason Frieden 185 Canfield Dr Stamford, CT 06902 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Arthur Young & Co self employed accountant Aggregate Year-to-Date $ 200.-	12/31/87	$200.00 (earmarked contribution)
F. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation	Date (month, day, year)	Amount of Each Receipt this Period
Richard Kowmana 16 Lisa Ct. Syosset, NY 11791 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Arthur Young & Co self employed accountant Aggregate Year-to-Date $ 500.-	12/31/87	$500.00 (earmarked contribution)
G. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation	Date (month, day, year)	Amount of Each Receipt this Period
Stuart Fleischer 25 High View Rd. Ossining, NY 10562 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Arthur Young & Co self employed accountant Aggregate Year-to-Date $ 500.-	12/31/87	$500.00 (earmarked contribution)

SUBTOTAL of Receipts This Page (optional) ..... $ 2950.00

TOTAL This Period (last page this line number only) .....

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SCHEDULE A — ITEMIZED RECEIPTS

Separate schedule(s) required for each category of the Detailed Summary Page

PAGE 6 OF 11

FOR LINE NUMBER 11(a)i

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NAME OF COMMITTEE (in Full)

ARTHUR YOUNG & CO POLITICAL ACTION COMMITTEE

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Vomen Lawlor 9378 Nurly Circle Yorktown Heights, NY 10598	Arthur Young & Co Occupation self employed accountant	12/21/87	$700.00 (earmarked contribution)
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date > $ 700.-		

B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Jesse Milot 18 Red Coat Lane Greenwich, CT 06830	Arthur Young & Co Occupation self employed accountant	12/31/87	$500.00 (earmarked contribution)
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date > $ 500.-		

C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Stephen Kelly 96 Schermerhorn St. Brooklyn, NY 11201	Arthur Young & Co Occupation self employed accountant	12/21/87	$1000.00 (earmarked contribution)
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date > $ 1000.-		

D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Charles Reynolds 12 Hilton Pl. Montvale, NJ 07645	Arthur Young & Co Occupation self employed accountant	12/21/87	$700.00 (earmarked contribution)
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date > $ 700.-		

E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Martin Bowne 16 Nicholson Dr. Chatham Township NJ 07928	Arthur Young & Co Occupation self employed accountant	12/21/87	$485.00 (earmarked contribution)
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date > $ 485.-		

F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Thomas McDermott 63 Monadnock Rd. Wellesley, MA 02181	Arthur Young & Co Occupation self employed accountant	12/31/87	$300.00
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date > $ 300.-		

G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Raymond Haas 26 Rockland Ave. Larchmont NY 10538	Arthur Young & Co Occupation self employed accountant	12/31/87	$200.00
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date > $ 200.-		

SUBTOTAL of Receipts This Page (optional)	$ 3885.00
TOTAL This Period (last page this line number only)	

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SCHEDULE A — ITEMIZED RECEIPTS

Separate schedule(s) for each category of the Detailed Summary Page

PAGE 11 OF 11

FOR LINE NUMBER 11(a)i

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NAME OF COMMITTEE (in Full)

ARTHUR YOUNG & CO POLITICAL ACTION COMMITTEE

A. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation / Aggregate Year-to-Date	Date (month, day, year)	Amount of Each Receipt this Period
Donald Aronson 530 Park Ave., Apt. 4-O New York NY 10021 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Arthur Young & Co Occupation self employed accountant Aggregate Year-to-Date > $ 250.-	12/31/87	$ 250.00
B. Full Name, Mailing Address and ZIP Code	**Name of Employer / Occupation / Aggregate Year-to-Date**	**Date (month, day, year)**	**Amount of Each Receipt this Period**
Verome Gold 34 Rose lane E. Rockaway, NY 11518 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Arthur Young & Co Occupation self employed accountant Aggregate Year-to-Date > $ 400.-	12/31/87	$ 400.00 (earmarked contribution)
C. Full Name, Mailing Address and ZIP Code	**Name of Employer / Occupation / Aggregate Year-to-Date**	**Date (month, day, year)**	**Amount of Each Receipt this Period**
Verome Gold 34 Rose Lane E. Rockaway NY 11518 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Arthur Young & Co Occupation self employed accountant Aggregate Year-to-Date > $ 420.-	12/31/87	$ 20.00
D. Full Name, Mailing Address and ZIP Code	**Name of Employer / Occupation / Aggregate Year-to-Date**	**Date (month, day, year)**	**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 / Aggregate Year-to-Date**	**Date (month, day, year)**	**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 / Aggregate Year-to-Date**	**Date (month, day, year)**	**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 / Aggregate Year-to-Date**	**Date (month, day, year)**	**Amount of Each Receipt this Period**
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date > $		

SUBTOTAL of Receipts This Page (optional)	$ 670.00
TOTAL This Period (last page this line number only)	$ 29725.00

93040952470

SCHEDULE B — ITEMIZED DISBURSEMENTS

Use separate schedule(s) for each category of the Detailed Summary Page

PAGE 1 OF 1

FOR LINE NUMBER 21

Any information copied from such Reports and 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.

NAME OF COMMITTEE (in Full)

ARTHUR YOUNG & CO POLITICAL ACTION COMMITTEE

	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. Full Name, Mailing Address and ZIP Code People for Dio Guardi 350 7th ave Ste 400 NY NY 10019	Contribution Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	12/31/87	$ 200.00
B. Full Name, Mailing Address and ZIP Code Steven Bartlett Congr Campaign Committee Celebration 4 Americans Dinner	Congressional Campaign Dinner Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	12/31/87	$ 2050.00
C. Full Name, Mailing Address and ZIP Code Billy Tauzin Comm d960 m Street NW #200 Washington DC 20007	Congressional Campaign lunch Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	12/31/87	$ 500.00
D. Full Name, Mailing Address and ZIP Code George Bush 9 West 57th Street, Ste 4250 New York NY 10019	Campaign for President Disbursement for: ☑ Primary ☐ General ☐ Other (specify)	12/31/87	$ 10 000.00 (5000 earmarked contribution)
E. Full Name, Mailing Address and ZIP Code Bob Dole Campaign 1251 AVE. of Americas N.Y. NY. 10020	Campaign for President Disbursement for: ☑ Primary ☐ General ☐ Other (specify)	12/31/87	$ 5000.00 ($ 4000 earmarked contribution)
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional)	
TOTAL This Period (last page this line number only)	$ 17850.00

93040952471

9304095 2472

from the desk of —
CARL D. UGGIO
(212) 407-2367

Ms. Shepard

Attached is a check in the amount of $500.00 for the remaining balance of our earmarked check to Bob Dole for President. Any questions please call.

Debbie

ARTHUR YOUNG, 277 Park Ave., New York, NY 10172

23040955247 3

ARTHUR YOUNG & COMPANY POLITICAL ACTION COMMITTEE

ACCOUNT NUMBER	EMPLOYEE NUMBER	AMOUNT	CHECK NUMBER	DATE	VENDOR NUMBER	OFFICE NUMBER	DEPT. NUMBER	INVOICE NUMBER	INVOICE DATE
1-4	5-8	9-17	18-24	25-31	33-36	37-38	40-41	42-47	48-53
2.01		$500.00	№ 532	2/19/88		86			

DESCRIPTION

BOB DOLE FOR PRESIDENT

BANKERS TRUST COMPANY
NEW YORK, N. Y.

ARTHUR YOUNG & COMPANY
POLITICAL ACTION COMMITTEE
277 PARK AVENUE • NEW YORK, N.Y. 10017

№ 532

1-103
210

DATE February 19,1988 $ 500.00

PAY FIVE HUNDRED DOLLARS ---------- DOLLARS

TO THE ORDER OF BOB DOLE FOR PRESIDENT

ARTHUR YOUNG & COMPANY
POLITICAL ACTION COMMITTEE

Paul A. Shejgw

AUTHORIZED SIGNATURE

⑈000532⑈ ⑆021001033⑆ 001⑉500269114⑈

230409552474

ALL STATE LEGAL SUPPLY CO.

9 3 0 4 0 9 5 2 4 7 5

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RQ-2

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

FEB 23 19[illegible]

Carl D. Liggio, Treasurer
Federal Arthur Young & Company
Political Action Committee
227 Park Avenue
New York, NY 10172

Identification Number: C00035493

Reference: Year End Report (12/1/87-12/31/87)

Dear Mr. Liggio:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule(s) A of your report discloses earmarked contributions from individuals, however, no Schedule(s) B has been provided to disclose the intended recipient as designated by the contributor. 11 CFR 110.6(c)(4) Please amend your report to disclose the original donor(s) and the designated recipient of the earmarked contribution(s) on Schedule B (see attached). In addition, Schedule(s) A of your report discloses a total of $14,160 in itemized earmarked receipts from individuals, however, Schedule(s) B discloses a total of $13,500 in earmarked contributions. Please clarify.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 376-2480.

Sincerely,

Tammy Rollins

Tammy Rollins
Reports Analyst
Reports Analysis Division

23040952476

Line Number 11b, p. 20

Contributions to Federal Candidates and Other Political Committees, p. 19

Purpose of Disbursement, see highlighted instructions on facing page.

Disbursement For, see highlighted instructions on facing page.

Check Not Deposited, p. 21

In-Kind Contributions, p. 14

Allocation, p. 14

Memo Entry, p. 80

$250 Earmarked Contribution, pp. 39 and 57

Footnote— Helpful Information (Optional)

23040952477

Page 1 of 1 for Line Number 11

ITEMIZED DISBURSEMENTS

(Contributions to Federal Candidates and Other Political Committees)

Name of Committee (In Full): National Organization Political Action Committee C00000001

A. Full Name, Mailing Address and ZIP Code Elect Phoebe White Committee 7224 Denston Street City, State 00000	Purpose of Disbursement: contribution to Phoebe White, House candidate, 01/State Disbursement for: ☐ Primary ☐ General ☒ Other (specify): 81 post debt	Date (mo., day, yr.) 8/3/84	Amount of Each Disbursement This Period $5,000.00
B. Full Name, Mailing Address and ZIP Code same as above	Purpose of Disbursement: same as above Disbursement for: ☒ Primary ☐ General ☐ Other (specify): 1984	Date (mo., day, yr.) 8/3/84	Amount of Each Disbursement This Period $4,200.00
C. Full Name, Mailing Address and ZIP Code Friends for Chow Committee 53 Burgess Street City, State 00000	Purpose of Disbursement: contribution to Griffin Chow, House candidate, 01/State Disbursement for: ☐ Primary ☐ General ☒ Other (specify): 81 post debt	Date (mo., day, yr.) 8/11/84	Amount of Each Disbursement This Period ($500.00) check lost in mail
D. Full Name, Mailing Address and ZIP Code Citizens for Merlin Block 7530 Cherry Way City, State 00000	Purpose of Disbursement: contribution to Merlin Block, House candidate, 01/State Disbursement for: ☐ Primary ☐ General ☐ Other (specify): 1984	Date (mo., day, yr.) 8/14/84	Amount of Each Disbursement This Period $1,000.00
E. Full Name, Mailing Address and ZIP Code Speedy Print Inc. 490 Penn Avenue City, State 00000	Purpose of Disbursement: printing for James Deegan, House candidate, 04/State Disbursement for: ☐ Primary ☐ General ☐ Other (specify): 1984	Date (mo., day, yr.) 8/19/84	Amount of Each Disbursement This Period $1,000.00
F. Full Name, Mailing Address and ZIP Code Image Advertising, Inc. 8213 Eighth Avenue City, State 00000	Purpose of Disbursement: in-kind contributions; see allocation below Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (mo., day, yr.) 8/20/84	Amount of Each Disbursement This Period $3,000.00
G. Full Name, Mailing Address and ZIP Code Reelect Hamilton Committee 7316 Braddock Avenue City, State 00000	Purpose of Disbursement: advertising for Alex Hamilton, Senate candidate, State Disbursement for: ☐ Primary ☐ General ☐ Other (specify): 1984	Date (mo., day, yr.) 8/24/84	Amount of Each Disbursement This Period in-kind $2,000.00 MEMO
H. Full Name, Mailing Address and ZIP Code Morgan for House Committee 16 S. Old Glebe Road City, State 00000	Purpose of Disbursement: advertising for Peter Morgan, House candidate, 05/State Disbursement for: ☐ Primary ☐ General ☐ Other (specify): 1984	Date (mo., day, yr.) 8/24/84	Amount of Each Disbursement This Period in-kind $1,000.00 MEMO
I. Full Name, Mailing Address and ZIP Code Garfield Katz for Senate One House Place, Suite P City, State 00000	Purpose of Disbursement: earmarked contribution for Garfield Katz, Senate cand., State Disbursement for: ☐ Primary ☐ General ☐ Other (specify): 1984	Date (mo., day, yr.) 8/27/84	Amount of Each Disbursement This Period $250 earmarked by J. Winter via cntr. check
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			$18,000.00

Note: Original contribution to Chow Committee was itemized on Schedule B, Line 21, of June monthly report.

9304095 2478

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee

(Summary Page)

USE FEC MAILING LABEL OR TYPE OR PRINT

1. NAME OF COMMITTEE (in full)	
Federal Arthur Young Political Action Committee	
ADDRESS (number and street) ☐ Check if different than previously reported	2. FEC IDENTIFICATION NUMBER
277 Park Avenue	C-00003492
CITY, STATE and ZIP CODE	3. ☐ This committee qualified as a multicandidate committee DURING THIS Reporting Period on _____ (date).
New York, NY 10172	

4. TYPE OF REPORT

(a) ☐ 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)

☐ Termination Report

Monthly Report Due On:

☐ February 20	☐ June 20	☐ October 20
☑ March 20	☐ July 20	☐ November 20
☐ April 20	☐ August 20	☐ December 20
☐ May 20	☐ September 20	☐ January 31

☐ 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 _____

(b) Is this Report an Amendment? ☐ YES ☒ NO

SUMMARY	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period 2/1/88 through 2/29/88		
6. (a) Cash on Hand January 1, 19 88		$ 70095.22
(b) Cash on Hand at Beginning of Reporting Period	$ 99840.37	
(c) Total Receipts (from Line 18)	$ 4334.03	$ 34709.56
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	$ 104174.40	$ 104804.78
7. Total Disbursements (from Line 28)	$ 1902.28	$ 2532.66
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	$ 102272.12	$ 102272.12
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	$	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or 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.

Type or Print Name of Treasurer: CARL D. LIGGO

Signature of Treasurer: Carl D Liggo

Date: 3/15/88

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

FEC FORM 3X (revised 4/87)

93040955247 9

DETAILED SUMMARY PAGE

of Receipts and Disbursements
(Page 2, FEC FORM 3X)

Name of Committee (in full)	Report Covering the Period From:	To:	
Federal Arthur Young Political Action Committee	2/1/85	2/29/88	
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			
(i) Itemized (use Schedule A)	2920.00	16345.25	11(a)(i)
(ii) Unitemized	1346.75	18229.75	11(a)(ii)
(iii) Total of contributions from individuals			11(a)(iii)
(b) Political Party Committees			11(b)
(c) Other Political Committees (such as PACs)			11(c)
(d) TOTAL CONTRIBUTIONS (add 11(a)(iii), (b), and (c))	4266.75	34575.00	11(d)
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES			12
13. ALL LOANS RECEIVED			13
14. LOAN REPAYMENTS RECEIVED			14
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	67.28	134.56	15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES			16
17. OTHER RECEIPTS (Dividends, Interest, etc.)			17
18. TOTAL RECEIPTS (add 11(d), 12, 13, 14, 15, 16 and 17)	4334.03	34709.56	18
II. DISBURSEMENTS			
19. OPERATING EXPENDITURES	67.28	197.66	19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES			20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	1835.00	2335.00	21
22. INDEPENDENT EXPENDITURES (use Schedule E)			22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 441a(d)) (use Schedule F)			23
24. LOAN REPAYMENTS MADE			24
25. LOANS MADE			25
26. REFUNDS OF CONTRIBUTIONS TO:			
(a) Individuals/Persons Other Than Political Committees			26(a)
(b) Political Party Committees			26(b)
(c) Other Political Committees (such as PACs)			26(c)
(d) TOTAL CONTRIBUTION REFUNDS (add 26(a), (b), and (c))			26(d)
27. OTHER DISBURSEMENTS			27
28. TOTAL DISBURSEMENTS (add 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	1902.28	2532.66	28
III. NET CONTRIBUTIONS/OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than loans)(from Line 11(d))	4266.75	34575.00	29
30. TOTAL CONTRIBUTION REFUNDS (from Line 26(d))	-	-	30
31. NET CONTRIBUTIONS (other than loans)(subtract Line 30 from 29)	4266.75	34575.00	31
32. TOTAL OPERATING EXPENDITURES (from Line 19)	67.28	197.66	32
33. OFFSETS TO OPERATING EXPENDITURES (from Line 15)	67.28	134.56	33
34. NET OPERATING EXPENDITURES (subtract Line 33 from 32)	—	63.10	34

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SCHEDULE B

ITEMIZED DISBURSEMENTS

Use separate schedule(s) for each category of the Detailed Summary Page

PAGE 1 OF 1

FOR LINE NUMBER 21

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NAME OF COMMITTEE (in Full)

Federal Arthur Young Political Action Committee

	Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for	Date (month, day, year)	Amount of Each Disbursement This Period
A.	Dick Gephardt Campaign 304 Penn Avenue, S.E. Washington, DC 20003	For President - Democrat Primary Disbursement for: ☑ Primary ☐ General ☐ Other (specify)	2/29/88	1,000.00
B.	Volunteers for Knox White P.O. Box 10782 Greenville, SC 29603	House, Republican Primary Campaign ID 125253 Disbursement for: ☑ Primary ☐ General ☐ Other (specify)	2/29/88	335.00
C.	Bob Dole For President	For President - Republican Primary Disbursement for: ☑ Primary ☐ General ☐ Other (specify)	2/29/88	500.00
D.		Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)		
E.		Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)		
F.		Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)		
G.		Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)		
H.		Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)		
I.		Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)		

SUBTOTAL of Disbursements This Page (optional)	
TOTAL This Period (last page this line number only)	1835.00

23040952481

9 3 0 4 0 9 5 2 4 8 2

Arthur Young

March 15. 1988

Tammy Rollins
Reports Analyst
Federal Election Commission
Reports Analysis Division
Washington, D.C. 20463

IDENTIFICATION NUMBER: C00035493

Reference : Letter Dated February 23, 1988

Dear Ms. Rollins,

This is in response to your letter dated February 23, 1988. regarding our December Monthly Report (12/01/87-12/31/87).

As per our telephone conversation yesterday, enclosed with this letter is the amended copy of our December Monthly Report. As we have agreed I only amended those pages that had earmarked contributions showing the intended recepient of the contribution by the individuals on Schedule A, and I had disclose the original donor of the earmarked contribution to the candidate by memo entry on Schedule B.

I hope this would settle this matter.

Sincerely,

Thelma D Villamor
Federal Arthur Young & Co.
Political Action Committee

cc: Carl Liggio
Kirk Lippincot

We take business personally.

93040952483

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee

(Summary Page)

USE FEC MAILING LABEL OR TYPE OR PRINT

1. NAME OF COMMITTEE (in full)	
Federal Arthur Young Political Action Committee	
ADDRESS (number and street) ☐ Check if different than previously reported	2. FEC IDENTIFICATION NUMBER
277 Park Avenue	C-00035492
CITY, STATE and ZIP CODE	3. ☐ This committee qualified as a multicandidate committee DURING THIS Reporting Period on _____ (date)
New York NY 10172	

4. TYPE OF REPORT

(a) ☐ 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)

☐ Termination Report

Monthly Report Due On:

☐ February 20 ☐ June 20 ☐ October 20
☐ March 20 ☐ July 20 ☐ November 20
☐ April 20 ☐ August 20 ☐ December 20
☐ May 20 ☐ September 20 ☐ January 31

☐ 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 _____

(b) Is this Report an Amendment? ☑ YES ☐ NO

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period 12/1/87 through 12/31/87			
6. (a)	Cash on Hand January 1, 19 87		$ 44814.85
(b)	Cash on Hand at Beginning of Reporting Period	$ 51235.22	
(c)	Total Receipts (from Line 18)	$ 37312.77	$ 69864.67
(d)	Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	$ 88547.99	$ 114679.54
7.	Total Disbursements (from Line 28)	$ 18452.77	$ 44584.32
8.	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	$ 70095.22	$ 70095.22
9.	Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	$	
10.	Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or 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.

Type or Print Name of Treasurer
CARL D. HAGER

Signature of Treasurer
Carl D. Hager

Date
3/16/88

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

FEC FORM 3X
(revised 4/87)

93040952484

DETAILED SUMMARY PAGE

of Receipts and Disbursements
(Page 2, FEC FORM 3X)

Name of Committee (in full): ARTHUR YOUNG + CO POLITICAL ACTION COMMITTEE

Report Covering the Period From 12/1/87 To 12/31/87

	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date	
I. RECEIPTS			
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees			
(i) Itemized (use Schedule A)	29726.00	41762.14	11
(ii) Unitemized	7526.25	27827.97	11
(iii) Total of contributions from individuals			11
(b) Political Party Committees			11
(c) Other Political Committees (such as PACs)			11
(d) TOTAL CONTRIBUTIONS (add 11(a)(iii), (b), and (c))	37251.25	69590.11	11
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES		152.50	12
13. ALL LOANS RECEIVED			13
14. LOAN REPAYMENTS RECEIVED			14
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	61.52	122.08	15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES			16
17. OTHER RECEIPTS (Dividends, Interest, etc.)			17
18. TOTAL RECEIPTS (add 11(d), 12, 13, 14, 15, 16 and 17)	37312.77	69864.69	18
II. DISBURSEMENTS			
19. OPERATING EXPENDITURES	61.52	843.07	19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES			20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	17850.00	43200.00	21
22. INDEPENDENT EXPENDITURES (use Schedule E)			22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 441a(d)) (use Schedule F)			23
24. LOAN REPAYMENTS MADE			24
25. LOANS MADE			25
26. REFUNDS OF CONTRIBUTIONS TO:			
(a) Individuals/Persons Other Than Political Committees	541.25	541.25	26
(b) Political Party Committees			26
(c) Other Political Committees (such as PACs)			26
(d) TOTAL CONTRIBUTION REFUNDS (add 26(a), (b), and (c))	541.25	541.25	26
27. OTHER DISBURSEMENTS			27
28. TOTAL DISBURSEMENTS (add 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	18452.77	44584.32	28
III. NET CONTRIBUTIONS/OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than loans)(from Line 11(d))	37251.25	69590.11	29
30. TOTAL CONTRIBUTION REFUNDS (from Line 26(d))	541.25	541.25	30
31. NET CONTRIBUTIONS (other than loans)(subtract Line 30 from 29)	36710.00	69048.86	31
32. TOTAL OPERATING EXPENDITURES (from Line 19)	61.52	843.07	32
33. OFFSETS TO OPERATING EXPENDITURES (from Line 15)	61.52	122.08	33
34. NET OPERATING EXPENDITURES (subtract Line 33 from 32)	-0-	720.99	34

23040952485

SCHEDULE A — ITEMIZED RECEIPTS

Use separate schedule(s) for each category of the Detailed Summary Page

PAGE 2 OF 11

FOR LINE NUMBER 11(a) i

Any information copied from such Reports and 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.

NAME OF COMMITTEE (in Full)

Federal Arthur Young & Co Political Action Committee

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Robert Burmester 28 Maplewood Dr Darien, Ct. 06820	Arthur Young & Co Occupation Self-Employed Accountant Aggregate Year-to-Date > $ 500.-	12/31/87	$ 500.00
Receipt For: ☐ Primary ☐ General ☐ Other (specify):			

B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Thomas A DeWinter 1605 N. Cedar Cir Minneapolis, Mn 55422	Arthur Young & Co Occupation Self-Employed accountant Aggregate Year-to-Date > $ 200.-	12/31/87	$ 200.00
Receipt For: ☐ Primary ☐ General ☐ Other (specify):			

C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Lawrence Bohm 154 Lambert Rd. New Canaan, CT 06840	Arthur Young & Co Occupation Self-Employed Accountant Aggregate Year-to-Date > $ 500.-	12/31/87	$500.00
Receipt For: ☐ Primary ☐ General ☐ Other (specify):			

D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Jerome Goldman 34 Mountain Ave Larchmont NY 10538	Arthur Young & Co Occupation Self Employed Accountant Aggregate Year-to-Date > $	12/31/87	$ 200.00 (ear marked for Bob Dole)
Receipt For: ☐ Primary ☐ General ☐ Other (specify):			

E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Nathan Alder 69 Joyce Road Hartsdale, NY 10530	Arthur Young & Co Occupation Self Employed Accountant Aggregate Year-to-Date > $	12/31/87	$ 900.00 ($450 - earmarked for Bob Dole; + $450 - earmarked for George Bush)
Receipt For: ☐ Primary ☐ General ☐ Other (specify):			

F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Walter Wohlgemuth 110 S Mountain Ave Montclair NJ 07042	Arthur Young & Co Occupation Self-Employed Accountant Aggregate Year-to-Date > $	12/31/87	$ 575.00 (ear marked for George Bush)
Receipt For: ☐ Primary ☐ General ☐ Other (specify):			

G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Paul Kramer 17 Huntley Road Holmdel, NJ 07733	Arthur Young & Co Occupation Self-Employed Accountant Aggregate Year-to-Date > $	12/31/87	$ 1000.00 ($500 earmarked for George Bush)
Receipt For: ☐ Primary ☐ General ☐ Other (specify):			

SUBTOTAL of Receipts This Page (optional)	
TOTAL This Period (last page this line number only)	

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SCHEDULE A — **ITEMIZED RECEIPTS**

Use separate schedule(s) for each category of the Detailed Summary Page

PAGE 3 OF 11

FOR LINE NUMBER

Any information copied from such Reports and 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.

NAME OF COMMITTEE (in Full)

Federal Arthur Young & Co Political Action Committee

A. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation / Aggregate Year-to-Date	Date (month, day, year)	Amount of Each Receipt this Period
Bryant Mc Carthy 515 North St. Greenwich, Ct 06830 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Arthur Young & Co Occupation Self Employed Accountant Aggregate Year-to-Date > $ 900.00	12/31/87	$ 900.00 ($450 earmarked for Bob Dole, $450 earmarked for G. Bush)
B. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation / Aggregate Year-to-Date	Date (month, day, year)	Amount of Each Receipt this Period
William McNamara 20 Crest Drive Midland Park, NJ 07432 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Arthur Young & Co Occupation Self Employed Accountant Aggregate Year-to-Date > $ 1000.00	12/31/87	$ 1000.00 ($500 earmarked for Bob Dole; & $500 earmarked for George Bush)
C. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation / Aggregate Year-to-Date	Date (month, day, year)	Amount of Each Receipt this Period
Richard Young 31 Louis Dr Melville NY 11747 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Arthur Young & Co Occupation Self employed Accountant Aggregate Year-to-Date > $ 1258.40	12/31/87	$ 1200.00 ($600 earmarked for Bob Dole; & $600 earmarked for George Bush)
D. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation / Aggregate Year-to-Date	Date (month, day, year)	Amount of Each Receipt this Period
Carl Harnick 3069 Ann St. Baldwin, NY 11510 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Arthur Young & Co Occupation Self Employed Accountant Aggregate Year-to-Date > $ 1000 -	12/31/87	$ 1000.00 ($500 earmarked for Bob Dole; & $500 earmarked for George Bush)
E. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation / Aggregate Year-to-Date	Date (month, day, year)	Amount of Each Receipt this Period
Bruce Greenwald 33 The Fairway Upper Montclair, NJ 07043 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Arthur Young & Co Occupation Self Employed Accountant Aggregate Year-to-Date > $ 307. -	12/31/87	$ 300.00 (earmarked for Bob Dole)
F. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation / Aggregate Year-to-Date	Date (month, day, year)	Amount of Each Receipt this Period
Thomas Hudgins 12 Ridge Crest East. Scarsdale, NY 10583 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Arthur Young & Co Occupation Self Employed Accountant Aggregate Year-to-Date > $ 1000 -	12/31/87	$ 1000.00 (earmarked for Bob Dole)
G. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation / Aggregate Year-to-Date	Date (month, day, year)	Amount of Each Receipt this Period
Glen Gage 401 E 34th St. New York, NY 10016 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Arthur Young & Co Occupation Self Employed Accountant Aggregate Year-to-Date > $ 320. -	12/31/87	$ 320.00

SUBTOTAL of Receipts This Page (optional)	$ 5720.00
TOTAL This Period (last page this line number only)	

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SCHEDULE A — ITEMIZED RECEIPTS

Use separate schedule(s) for each category of the Detailed Summary Page

PAGE 5 OF 11

FOR LINE NUMBER 11 (a) i

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NAME OF COMMITTEE (in Full)

Federal Arthur Young & Co Political Action Committee

A. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation / Aggregate Year-to-Date	Date (month, day, year)	Amount of Each Receipt this Period
Jack Atchison 3619 N. Cuth St Scottsdale, Az 85251 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Arthur Young & Co Self Employed Accountant Aggregate Year-to-Date $ 100 -	12/3./87	$ 200.00
B. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation / Aggregate Year-to-Date	Date (month, day, year)	Amount of Each Receipt this Period
John Brickson 277 Park Avenue New York, NY 10172 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Arthur Young & Co Self Employed Accountant Aggregate Year-to-Date $ 200 -	12/3./87	$ 200.00
C. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation / Aggregate Year-to-Date	Date (month, day, year)	Amount of Each Receipt this Period
John Goodwin Box 119 Dolington Rd Newton, Pa 18940 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Arthur Young & Co Self Employed Accountant Aggregate Year-to-Date $ 250 -	12/3./87	$ 250.00
D. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation / Aggregate Year-to-Date	Date (month, day, year)	Amount of Each Receipt this Period
William Gladstone 5 Knollwood Dr. Stamford, Ct. 06902 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Arthur Young & Co Self Employed Accountant Aggregate Year-to-Date $ 1000 -	12/2./87	$ 1000.00 ($500 earmarked for Bob Dole - $500 earmarked for George Bush)
E. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation / Aggregate Year-to-Date	Date (month, day, year)	Amount of Each Receipt this Period
Susan Frieden 185 Canfield Dr., Stamford, CT 06902 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Arthur Young & Co Self employed Accountant Aggregate Year-to-Date $ 783 -	12/21/87	$ 300.00 (earmarked for George Bush)
F. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation / Aggregate Year-to-Date	Date (month, day, year)	Amount of Each Receipt this Period
Richard Kessman 15 Lisa Ct. Syosset, NY 11791 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Arthur Young & Co Self employed Accountant Aggregate Year-to-Date $ 500 -	12/21/87	$ 500.00 (earmarked for George Bush)
G. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation / Aggregate Year-to-Date	Date (month, day, year)	Amount of Each Receipt this Period
Stuart Fleischer 25 High View Rd Ossining, NY 10562 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Arthur Young & Co Self Employed Accountant Aggregate Year-to-Date $ 500 -	12/21/87	$ 500.00 (earmarked for George Bush)

SUBTOTAL of Receipts This Page (optional) ..... $ 2950.00

TOTAL This Period (last page this line number only) .....

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SCHEDULE B — ITEMIZED DISBURSEMENTS

Use separate schedule(s) for each category of the Detailed Summary Page

PAGE 3 OF 4

FOR LINE NUMBER 21

Any information copied from such Reports and 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.

NAME OF COMMITTEE (in Full)

Federal Arthur Young Political Action Committee

	Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A.	George Bush 9 West 57th Street, Ste 4250 New York, NY 10019	Campaign for President Disbursement for: ✓ Primary ☐ General ☐ Other (specify)	12/31/87	$700.00 earmarked by Charles Reynolds via conte check MEMO ENTRY
B.	George Bush 9 West 57th Street, Ste 4250 New York, NY 10019	Campaign for President Disbursement for: ✓ Primary ☐ General ☐ Other (specify)	12/31/87	$325.00 earmarked by Martin Groupe via conte check MEMO ENTRY
C.	Bob Dole Campaign 1251 Ave of Americas New York NY 10020	Campaign for President Disbursement for: ✓ Primary ☐ General ☐ Other (specify)	12/31/87	$5000.00 ($4500 earmarked contribution)
D.	Bob. Dole Campaign 1251 Ave of Americas New York, NY 10020	Campaign for President Disbursement for: ✓ Primary ☐ General ☐ Other (specify)	12/31/87	$200.00 earmarked by Jerome Goldman via conte check MEMO ENTRY
E.	Bob Dole Campaign 1251 Ave of Americas New York, NY 10020	Campaign for President Disbursement for: ✓ Primary ☐ General ☐ Other (specify)	12/31/87	$450.00 earmarked by Nathan Alder via conte check MEMO ENTRY
F.	Bob Dole Campaign 1751 Ave of Americas New York, NY 10020	Campaign for President Disbursement for: ✓ Primary ☐ General ☐ Other (specify)	12/31/87	$450.00 earmarked by Bryant McCarthy via conte check MEMO ENTRY
G.	Bob Dole Campaign 1251 ave of Americas New York, NY 10020	Campaign for President Disbursement for: ✓ Primary ☐ General ☐ Other (specify)	12/31/87	$500.00 earmarked by William McNamara via conte check MEMO ENTRY
H.	Bob Dole Campaign 1251 Ave of Americas New York, NY 10020	Campaign for President Disbursement for: ✓ Primary ☐ General ☐ Other (specify)	12/31/87	$600.00 earmarked by Richard Young via conte check MEMO ENTRY
I.	Bob Dole Campaign 1251 Ave of Americas New York, NY 10020	Campaign for President Disbursement for: ✓ Primary ☐ General ☐ Other (specify)	12/31/87	$500.00 earmarked by Carl Harnick via conte check MEMO ENTRY

SUBTOTAL of Disbursements This Page (optional) $5000.00

TOTAL This Period (last page this line number only) .....

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SCHEDULE B — ITEMIZED DISBURSEMENTS

[redacted] separate schedule(s) for each category of the Detailed Summary Page

PAGE 4 OF 4

FOR LINE NUMBER 21

Any information copied from such Reports and 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.

NAME OF COMMITTEE (in Full)

Federal Arthur Young Political Action Committee

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for	Date (month, day, year)	Amount of Each Disbursement This Period
Bob Dole Campaign 1251 Ave of Americas New York, NY 10020	Campaign for President Disbursement for: [✓] Primary [ ] General [ ] Other (specify)	12/31/87	$300.00 earmarked by Bruce Greenwald via cntr check MEMO ENTRY
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for	Date (month, day, year)	Amount of Each Disbursement This Period
Bob Dole Campaign 1251 Ave of Americas New York, NY 10020	Campaign for President Disbursement for: [✓] Primary [ ] General [ ] Other (specify)	12/31/87	$1000.00 earmarked by Thomas Hudgins via cntr check MEMO ENTRY
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for	Date (month, day, year)	Amount of Each Disbursement This Period
Bob Dole Campaign 1251 Ave of Americas New York, NY 10020	Campaign for President Disbursement for: [✓] Primary [ ] General [ ] Other (specify)	12/31/87	$500.00 earmarked by William Gladstone via cntr check MEMO ENTRY
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: [ ] Primary [ ] General [ ] Other (specify)		
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: [ ] Primary [ ] General [ ] Other (specify)		
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: [ ] Primary [ ] General [ ] Other (specify)		
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: [ ] Primary [ ] General [ ] Other (specify)		
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: [ ] Primary [ ] General [ ] Other (specify)		
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: [ ] Primary [ ] General [ ] Other (specify)		

SUBTOTAL of Disbursements This Page (optional)	0.00
TOTAL This Period (last page this line number only)	$17850.00

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ALL STATE LEGAL SUPPLY CO. - MINNEAPOLIS - MINN.

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FEDERAL ELECTION COMMISSION
WASHINGTON DC 20463

RQ-3

March 17, 1988

Carl D. Liggio, Treasurer
Federal Arthur Young & Company
Political Action Committee
277 Park Avenue
New York, NY 10172

Identification Number: C00035493

Reference: Year End Report (12/1/87-12/31/87)

Dear Mr. Liggio:

This letter is to inform you that as of March 16, 1988, the Commission has not received your response to our request for additional information, dated February 23, 1988. That notice requested information essential to full public disclosure of your Federal election financial activity and to ensure compliance with provisions of the Federal Election Campaign Act (the Act). A copy of our original request is enclosed.

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Tammy Rollins on our toll-free number (800) 424-9530 or our local number (202) 376-2480.

Sincerely,

John D. Gibson

John D. Gibson
Assistant Staff Director
Reports Analysis Division

Enclosure

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FEDERAL ELECTION COMMISSION

WASHINGTON DC 20463

RE-2

1823

Carl D. Liggio, Treasurer
Federal Arthur Young & Company
Political Action Committee
277 Park Avenue
New York, NY 10172

Identification Number: C00035493

Reference: Year End Report (12/1/87-12/31/87)

Dear Mr. Liggio:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule(s) A of your report discloses earmarked contributions from individuals, however, no Schedule(s) B has been provided to disclose the intended recipient as designated by the contributor. 11 CFR 110.6(c)(4) Please amend your report to disclose the original donor(s) and the designated recipient of the earmarked contribution(s) on Schedule B (see attached). In addition, Schedule(s) A of your report discloses a total of $14,160 in itemized earmarked receipts from individuals, however, Schedule(s) B discloses a total of $13,500 in earmarked contributions. Please clarify.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 376-2480.

Sincerely,

Tammy Rollins

Tammy Rollins
Reports Analyst
Reports Analysis Division

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[redacted]

Purpose of Disbursement, see highlighted instructions on facing page.

Disbursement For, see highlighted instructions on facing page.

Check Not Deposited, p. 21

In-Kind Contributions, p. 14

Allocation, p. 14

Memo Entry, p. 80

$280 Earmarked Contribution, pp. 38 [redacted]

Footn[redacted] Helpfu[redacted] (Optional)

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[redacted]

Contributions to Federal Candidates and Other Political Committees

National Organization Political Action Committee C00000001

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Candidate, Office Sought, State	Date (Month, Day, Year)	Amount of Each Disbursement This Period
Elect Phoebe White Committee 7224 Dunston Street City, State 00000	contribution to Phoebe White, House candidate, 01/State Subscription for Primary / General XX Other (specify) 01 and debt	8/3/84	$1 [illegible]
B. Full Name, Mailing Address and ZIP Code same as above	Purpose of Disbursement same as above Subscription for Primary / General X Other (specify) 1984	8/3/84	$4 [illegible]
C. Full Name, Mailing Address and ZIP Code Friends for Chew Committee 53 Burgess Street City, State 00000	Purpose of Disbursement contribution to Griffin Chew, House candidate, 01/State Subscription for Primary / General XX Other (specify) 01 and debt	8/11/84	($500.00) check dated 6/6
D. Full Name, Mailing Address and ZIP Code Citizens for Hanlin Hinch 1530 Cheney Way City, State 00000	Purpose of Disbursement contribution to Hanlin Hinch, House candidate, 01/State Subscription for Primary / General X Other (specify) 1984	8/14/84	[redacted]
E. Full Name, Mailing Address and ZIP Code Speedy Print Inc. 490 Penn Avenue City, State 00000	Purpose of Disbursement printing for Jesse Deegan, House candidate, primary Subscription for Primary / General X Other (specify) 1984	8/19/84	[redacted]
F. Full Name, Mailing Address and ZIP Code Image Advertising, Inc. 1213 Eighth Avenue City, State 00000	Purpose of Disbursement in-kind contribution; see allocation below Subscription for Primary / General X Other (specify)	8/20/84	$3,000.00
G. Full Name, Mailing Address and ZIP Code Bedford Hamilton Committee 7326 Shaddock Avenue City, State 00000	Purpose of Disbursement advertising for Alex Hamilton, Senate candidate, State Subscription for Primary / General X Other (specify) 1984	8/24/84	Amount of Each Disbursement This Period in-kind $2,000.00 MEMO
H. Full Name, Mailing Address and ZIP Code Keegan for Senate Committee 26 S. Old State Road City, State 00000	Purpose of Disbursement advertising for Peter Keegan, House candidate, 01/State Subscription for Primary / General X Other (specify) 1984	8/24/84	Amount of Each Disbursement This Period in-kind $1,000.00 MEMO
I. Full Name, Mailing Address and ZIP Code Oakfield Unit for Equality One Union Plaza, Suite P [redacted]	Purpose of Disbursement contribution for Candidate [redacted] Subscription for Primary / General X Other (specify) 1984	8/27/84	Amount of Each Disbursement This Period $250 earmarked by J. Hinton [illegible]
			$18,000.00

[redacted] contribution to Chew Committee was itemized on Schedule B, Line 21, as reported.

ALL STATE LEGAL SUPPLY CO.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 21, 1991

Harry D. Slaughter, Treasurer
Ernst & Young Los Angeles
Political Action Committee
(EYLA-PAC)
515 South Flower Street
Los Angeles, CA 90071

RE: MUR 3309
Ernst & Young Los Angeles
Political Action Committee
(EYLA-PAC) and
Harry D. Slaughter, as treasurer

Dear Mr. Slaughter:

On October 29, 1991, the Federal Election Commission found that there is reason to believe the Ernst & Young Los Angeles Political Action Committee (EYLA-PAC) ("Committee") and you, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A), 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 the Committee and you, as treasurer. 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 the Committee and you, as treasurer, 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

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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.

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 enclosed a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 219-3690.

Sincerely,

John Warren McGarry

John Warren McGarry
Chairman

Enclosures
Factual and Legal Analysis
Procedures
Designation of Counsel Form

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENTS: Ernst & Young Los Angeles Political Action Committee and Harry D. Slaughter, as treasurer

MUR: 3309

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. 2 U.S.C. § 437(a)(2). It is based on the audit of the Dole for President Committee pursuant to 26 U.S.C. § 9038(a).

No multicandidate political committee shall make contributions to any candidate and his authorized political committees with respect to any election for Federal office which, in the aggregate, exceed $5,000.00.[1] 2 U.S.C. § 441a(a)(2)(A). These limitations apply separately to each election, except that all elections held in any calendar year for the office of President of the United States (except a general election for such office) shall be considered to be one election. 2 U.S.C. § 441a(a)(6).

Commission regulations explain that contributions which exceed the contribution limitations may be deposited into a campaign depository. If any such contributions are so deposited, the treasurer may request redesignation or reattribution of the contribution by the contributor in accordance with Commission

---

1. A multicandidate political committee means any committee that has been registered with the Commission for at least six months and has received contributions from more than 50 persons and, except for a state political party organization, has made contributions to five or more candidates. 2 U.S.C. § 441a(a)(4).

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regulations. If a redesignation or reattribution is not obtained, the treasurer shall, within 60 days of the treasurer's receipt of the contribution, refund the contribution to the contributor. 11 C.F.R. § 103.3(b)(3).

The examination and audit of the Dole for President Committee revealed that the Respondents made the following contributions to the Committee:

Date	Amount
6/03/87	$1,000
8/07/87	$1,000
12/23/87	$1,000
12/23/87	$4,000
12/31/87	$ 500

These contributions exceed the $5,000 limitation for contributions to candidates for President of the United States.

Therefore, there is reason to believe Ernst & Young Los Angeles Political Action Committee and Harry D. Slaughter, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A).

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Ernst & Young - Los Angeles
Political Action Committee
515 South Flower Street
Los Angeles, CA 90071

January 10, 1992

Mr. Jeffrey Long
Federal Election Commission
999 E Street, NW
Washington , DC 20463

Matter Under Review (MUR #3309)

Dear Mr. Long:

This letter is to confirm our telephone conversation earlier this week concerning the allegations that the Ernst & Young Los Angeles PAC had made contributions to the Dole for President Committee in excess of the contributions allowed by law.

I informed you that the PAC referred to in your MUR #3309 had made no contributions to the campaign of Dole for President. I have checked the records of the PAC then know as the Arthur Young Los Angeles PAC for the entire year of 1987 and also 1986 to assure that there were no such contributions.

You indicated in your return phone call to me that it did appear there was a mistake in associating these contributions with this PAC (FEC ID# C00103606).

Please let me know if any further action is required on my part to resolve this matter.

If there are any questions my direct phone in Los Angeles is 213/977-3567.

Sincerely,

Harry D. Slaughter III

Harry D. Slaughter III, Treasurer
Ernst & Young - Los Angeles PAC

Copy to: John R. Toole

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ALL STATE LEGAL SUPPLY CO.

IN THE MATTER OF
FEDERAL ELECTION COMMISSION MUR 3309

AFFIDAVIT OF CARL D. LIGGIO

STATE OF NEW YORK)
: ss.:
COUNTY OF NEW YORK)

CARL D. LIGGIO, being first duly sworn on oath, deposes and states that he has read the following Affidavit, by him subscribed, and that the statements herein are true and correct to the best of his knowledge and belief:

1. I was treasurer of Federal Arthur Young and Company Political Action Committee ("FAY-PAC") between April 1987 and May 1988.

2. During that period of time, FAY-PAC received contributions earmarked for the Dole for President Committee, Inc.

3. At no time did I or FAY-PAC exercise any direction or control over the choice of the recipient candidate in connection with those contributions.

FURTHER AFFIANT SAYETH NAUGHT.

Carl D. Liggio
CARL D. LIGGIO

SUBSCRIBED AND SWORN TO
BEFORE ME THIS 27TH DAY
OF JANUARY, 1992.

Loretta Seda
NOTARY PUBLIC

LORETTA SEDA
Notary Public, State of New York
No. 31-3579135
Qualified in New York County
Commission Expires February 28, 1992

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RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM
92 FEB 10 AM 11:53

GODWIN, CARLTON & MAXWELL

ATTORNEYS AND COUNSELORS

A Professional Corporation

JAMES G. VETTER, JR.
Board Certified-Tax Law
Texas Board of Legal Specialization
Direct Dial
(214) 939-4817

3300 NCNB Plaza
901 Main Street
Dallas, Texas 75202-3714

Telephone: (214) 939-4400
D/FW Metro: 263-1186
Telefax: (214) 760-7332

February 4, 1992

Mr. Jeffrey Long
Office of General Counsel
Federal Election Commission
999 E Street
Washington, D.C. 20463

Re: MUR3309
Lonnie Ken Pilgrim

Dear Mr. Long:

This will confirm our conversation wherein I advised you that I had found one (1) check payable to the Dole for President Committee which was written on March 11, 1987. You advised me that there was an additional $2,000 contribution made in October 1987. I told you that I would further track that payment and report to you as soon as I find it. I further advised that Mr. Pilgrim was married in 1987 at the time of both alleged contributions. I will keep you advised.

Very truly yours,

James G. Vetter, Jr.

JGV:jmk
cc: Lonnie Ken Pilgrim

93040952504

KENNEDY COVINGTON LOBDELL & HICKMAN

ATTORNEYS AT LAW
3300 NCNB PLAZA
CHARLOTTE, NORTH CAROLINA 28280-8082
TELEPHONE 704/377-6000

SOUTH CAROLINA OFFICE
THE GUARDIAN BUILDING
ONE LAW PLACE-SUITE 301
P. O. BOX 11429
ROCK HILL, S.C. 29731-1429
TELEPHONE 803/327-6171

FACSIMILES
CHARLOTTE 704/331-7598
ROCK HILL 803/324-4737

WRITER'S DIRECT DIAL NUMBER
704/331-7452

MARCUS T. HICKMAN
CLARENCE W. WALKER
JAMES E. (BILL) WALKER
HENRY C. LOMAX
EDGAR LOVE III
CHARLES V. TOMPKINS, JR.
GLEN B. HARDYMON
J. DONNELL LASSITER
ROSS J. SMYTH
A. ZACHARY SMITH III
WILLIAM F. DREW, JR.
CHARLES O. DUBOSE
RALEIGH A. SHOEMAKER
JOHN M. MURCHISON, JR.
STEPHEN M. S. COURTLAND
RICHARD D. STEPHENS
F. PINCHER JARRELL
MAYNARD E. TIPPS
WAYNE P. HUCKEL
J. NORFLEET PRUDEN III
WILLIAM C. LIVINGSTON
LEE WEST MOVIUS

JOSEPH B. C. KLUTTZ
JONATHAN A. BARRETT
EUGENE C. PRIDGEN
STEPHEN K. RHYNE
E. ALLEN PRICHARD
RAYMOND E. OWENS, JR.
HENRY W. FLINT
DAVID H. JONES
NANCY BLACK NORELLI
JAMES C. HARDIN III*
PETER McLEAN III
MYLES E. STANDISH
KIRAN H. MEHTA
MICHAEL S. HAWLEY
JAMES P. COONEY III
CAROL NASH NORMAN*
BRIAN P. EVANS
JEFFERSON W. BROWN
LYNN OLIVER WENIGE
GEORGE C. COVINGTON*
DANIEL L. JOHNSON, JR.

WALTER D. FISHER, JR.*
LISA HYMAN LANE*
ALICE CARMICHAEL RICHEY
DENNARD LINDSEY TEAGUE
DEAN A. WARREN
STEPHEN R. McCRAE, JR.**
H. WILLIAM PALMER, JR.
JOHN H. CULVER III
BOBBY D. HINSON*
WILLIAM B. KIRK, JR.
MICHELLE C. LANDERS
W. HENRY SIPE III**
BEVERLY A. CARROLL**
LESLEE K. DAUGHERTY
LEROY P. HUTCHINSON
BRIAN C. REEVE
RANDALL W. LEE
MARK E. SWOFFORD**
WILLIAM N. HARRIS
ALLISON R. BARNHILL
BARBARA R. FRITH
J. ANDRE HALL

A. LEE HOGEWOOD III
CORY HOHNBAUM
C. CORLEY HOLT
FELICIA A. WASHINGTON
DAVID W. BROWN, JR.
JAMES E. EARLE
KENNETH L. FREDERICK**
CLIFFORD R. JARRETT
CAROL A. JONES VAN BUREN

FRANK H. KENNEDY
1893-1975
HUGH L. LOBDELL
1908-1988

OF COUNSEL
W. T. COVINGTON, JR.
DAVID GRIER MARTIN, JR.

SPECIAL COUNSEL
THOMAS B. FAYNE
ROBERT H. CARPENTER**

EXCEPT AS NOTED ATTORNEYS ADMITTED IN N.C. ONLY
*ADMITTED IN N.C. AND S.C.
**ADMITTED IN S.C. ONLY

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
92 FEB 28 AM 11:26

February 24, 1992

Lawrence D. Parrish, Esquire
General Counsel's Office
Federal Election Commission
Washington, DC 20463

RE: MUR 3309
Becon Construction Company
Our File No. 06423-007

Dear Mr. Parrish:

In connection with the above-referenced matter, our client, Becon Construction Company, desires to pursue and hereby requests pre-probable cause conciliation.

Sincerely,

Marcus T. Hickman
For the Firm

MTH/bc

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM
92 FEB 27 AM 9:55

2340952505

Geraldine A[illegible]
Agency Cont[illegible]

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

92 FEB 28 AM 9:18

MassMutual

One Benham Place
9400 North Broadway, Suite 700
Oklahoma City, OK 73114-7493
405 478-5360

February 25, 1992

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
92 FEB 28 AM 11:21

Mr. Lawrence Parrish
Federal Election Commission
Washington, D. C. 20463

RE: MUR 3309

Dear Mr. Parrish:

In response to your recent telephone call, this is to reiterate that Mr. Wilson, my employer and the "W" of H & W Aviation, was certainly not aware that he was in violation of any law when he agreed to a reduced rate on the charter in question.

As I mentioned, the hourly rate did vary, and the enclosed copy of the trip charges will show you that even though the charge was reduced, there still was a profit earned on the trip.

I believe that I also told you that H & W Aviation no longer exists, as the aircraft was sold in the fall of 1990. For this reason, we would rather not have to retain legal counsel to settle this matter.

To summarize, we had verbally agreed upon a price, and in order to collect what we could, we reduced the amount to an acceptable level for all parties. The amount received paid all out-of-pocket costs as well as generating a substantial profit.

Please call if there is anything further that I can do.

Sincerely,

Geraldine Ann Price

Geraldine Ann Price

9304095506

JP Charter 26

H & W AVIATION
One Benhar Place, Suite 700
9400 N. Broadway
Oklahoma City, Ok.. 73114
405-478-5360

DATE 3-4-88/3-5-88 CUSTOMER Charter - Dole Campaign

FROM/TO OKC/Wash.D.C./OKC/Tulsa/ ADDRESS

Waterloo, Iowa/Wash.D.C./OKC

1.	Flight Time 11.8 hours — Fuel charges(see below)	$ 6,065.03
2.	Crew Expenses	
	Lodging ____ Meals ____	
	Transportation ____ Tips ____	
	Telephone ____ Other ____	
3.	Ranger, parking	25.00
4.	Landing fees, cleaning, maintenance	34.40
5.	Customs, permits	
6.	Catering, beverages	111.55
7.	Passenger transportation / telephone	39.69
8.	Flight planning/Weather services	
9.	Other - pilot commissions	800.00
		$ 7,075.67

Revenue 12,000.00
Excess 4,924.33

TOTAL CHARGES

	used	bought	to be charged
OKC/Wash.D.C.	695	696	1,213.68
Wash.D.C./OKC	907	300 @ 1.76	528.00
OKC/Tulsa	156	600	1,002.00
Tulsa/Waterloo	371	372	589.84
Waterloo/Wash.D.C.	535	695	1,304.15
Wash.D.C./OKC	810	811 @ 1.76	1,427.36
	3,474	3,474	6,065.03

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
92 FEB 28 AM 11:25

9 9 5 2 5 0 7
930

The RBA Group
ENGINEERS • ARCHITECTS • PLANNERS
William Garro, P.E., P.P. • Warren Bendiksen, R.A., P.P. • John Murphy, R.A.

March 31, 1992

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
92 APR -2 PM 3:32

Lawrence D. Parrish, Esq.
Federal Election Commission
Washington, D.C. 20463

Re: MUR 3309
The RBA Group

Dear Mr. Parrish:

Pursuant to our telephone conversation of March 27, 1992, I am enclosing herewith an affidavit of William Garro, President of The RBA Group, in support of our position that no action should be taken on this matter. At issue here is the payment of $2,000. for two tickets to the New Jersey Tribute to Senator Bob Dole dinner, held on December 8, 1987 at the Parsippany Hilton Hotel, Parsippany, New Jersey.

As stated in the affidavit, there was no knowledge of any improprieties at the time of the purchase. The alleged violation therefore was neither willful nor in the nature of intentional disregard of the corporate employees or officials. See, FEC v. National Education Ass'n, 475 F. Supp. 1102, 1112 (D.D.C. 1978). It is therefore our position that civil penalties are unwarranted under these circumstances.

It is respectfully requested that you consider these circumstances as set forth in Mr. Garro's affidavit and our request that pre probable cause conciliation be pursued.

Very truly yours,

John J. Maiorana
Counsel

JJM:cb (MUR.3309)

APR 2 9 25 AM '92
RECEIVED
FEDERAL ELECTION
COMMISSION
MAIL ROOM

9304095508

1 EVERGREEN PLACE, P.O. BOX 1927, MORRISTOWN, NJ 07962-1927 (201) 898-0300 • FAX (201) 898-9472
Morristown, NJ • New York, NY • Columbia, MD • Atlanta, GA • Baton Rouge, LA • Doylestown, PA • Charlotte, NC

THE RBA GROUP
MATTER UNDER REVIEW 3309

AFFIDAVIT OF
WILLIAM GARRO

State of New Jersey)ss.
County of Morris)

William Garro, of full age, being duly sworn according to law, upon his oath deposes and says:

1. I am the President of The RBA Group and was in the same capacity at the time of the alleged violation.

2. The RBA Group is a firm of engineers, architects and planners and has been in business for 23 years.

3. In response to a written invitation to attend a reception honoring Senator Robert Dole and Elizabeth Hanford Dole (on December 8, 1987), The RBA Group purchased two tickets at a total cost of $2,000.

4. The RBA Group mailed a check for $2,000 dated December 2, 1987 to the Dole for President Committee.

5. At the time the check was issued, I was unaware of any impropriety associated with the purchase of the two tickets.

6. It is my recollection that the Dole Committee, upon receipt of the check, advised The RBA Group that it was improper for the corporation, as opposed to individual representatives, to make such a purchase. It is my further recollection that the Dole Committee may have returned the check.

7. It is also my understanding that in response to said notification, principals of The RBA Group reimbursed the corporation and/or the Dole Committee with personal funds.

8. It was my belief that such reimbursement was satisfactory to the Dole Committee and corrected any appearance of or actual impropriety.

9. I make this affidavit in response to the matter under review by the Federal Election Commission (MUR 3309) and request that no further action be taken in this matter under the circumstances. In the alternative, The RBA Group is interested in pursuing pre-probable cause conciliation.

Sworn and subscribed to before me
this 31st day of March, 1992

William Garro
President

John J. Maiorana
Attorney at Law, State of New Jersey

(3309)

9304095509

RECEIVED
FEDERAL ELECTION
COMMISSION
MAIL ROOM

APR 18 11 31 AM '92

KATZ & PANTIRER
A PROFESSIONAL CORPORATION
COUNSELLORS AT LAW
1325 MORRIS AVENUE
P.O. BOX 685
UNION, NEW JERSEY 07083
(908) 688-5454

TELECOPIER (908) 688-8248

STEVEN W. KATZ*
LARRY PANTIRER
RICHARD J. BIRDOFF**
LAWRENCE P. BLENDEN

*ALSO MEMBER OF FLORIDA AND PENNSYLVANIA BARS

**ALSO MEMBER OF NEW YORK, FLORIDA AND GEORGIA BARS

MONMOUTH COUNTY
290 NORWOOD AVENUE
DEAL, NEW JERSEY 07723

REPLY TO UNION OFFICE

FILE NO.

April 13, 1992

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Lawrence D. Parrish, Staff Attorney
Federal Election Commission
Washington, D.C. 20463

RE: **Bertram Associates**
MUR 3309

Dear Mr. Parrish:

Enclosed please find letter from The National State Bank, dated January 17, 1992, advising that Check No. 895, dated December 3, 1987, was given by Bertram Associates, a Partnership. Please advise if there is any additional information which you require.

Thank you very much.

Very truly yours,

STEVEN W. KATZ

SWK:cmi
Enclosure

cc: Bertram Associates

92 APR 20 AM 3:20

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

93040925510

The National State Bank
100 Woodbridge Center Drive
P.O. Box 1812
Woodbridge, N.J. 07095-0984
Telephone: (908) 855-6678
Facsimile: (908) 855-9718

Jeffrey E. Peckham
Vice President

The National State Bank

January 17, 1992

Bertram Associates, Inc.
1325 Morris Avenue
Union, N.J. 07083

Re: Bertram Associates, Inc.

Attn: Terry Borcalo

Pursuant to your inquiry regarding the organizational style of the referenced entity, it is indeed a partnership format.

Very truly yours,

Jeffrey E. Peckham
Vice President

JEP/wl
MM#5/LE-BERTRAM

A Constellation Bank

930409552511

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 5, 1992

James L. Hagen, Treasurer
Dole for President Committee, Inc.
P.O. Box 859
McLean, VA 22101

RE: MUR 3309
Dole for President Committee, Inc., and James L. Hagen, as treasurer

Dear Mr. Hagen:

Enclosed are copies of the charts relating to the corporate contributors, corporate aircraft, unrefunded individual excessive contributions, and the political action committees together with copies of the checks relating to the PACs. A copy of these materials is also being sent to Scott Morgan.

Sincerely,

George T. Rishel

George T. Rishel
Assistant General Counsel

Enclosures

93040955212

EXHIBIT C
ATTACHMENT 1

Dole for President
Apparent Excessive Contributions -
Never Refunded by Committee

Contributor Name	Excessive Contribution: Deposit Date	Excessive Contribution: Amount	Aggregate Total	Amount in Excess
1. Richard W. Brown	03/25/88	$1,000.00	$2,000.00	$1,000.00
2. Stephen B. Flood	03/16/88	2,000.00	2,000.00	1,000.00
3. James J. Hagen	12/24/87	1,000.00	1,100.00	100.00
4. Don Hall	02/12/88	3,000.00	3,000.00	2,000.00
5. John W. Jordan, II	03/01/88	2,000.00	2,000.00	1,000.00
TOTAL				$5,100.00

93040952513

Excessive Contributions from Political Committees

	Committee Name	Q1/	Contribution Dates	Contribution Amounts	Excessive Portions	Refunds Dates	Refunds Amounts	No. of Days to Refund
1.	Arthur Young & Company PAC	Y	6/03/87	$1,000.00	$			
			8/07/87	1,000.00 2/				
			12/23/87	1,000.00				
			12/23/87	4,000.00	2,000.00			
			12/31/87	500.00	500.00 3/			
2.	Dallas Citizens PAC	N	1/11/87	1,000.00				
			1/11/88	1,000.00	1,000.00 3/			
3.	Fluor Corporation Public Affairs Committee (FLUOR PAC)	Y	6/30/87	5,000.00				
			11/04/87	2,000.00	2,000.00	2/18/88	$2,000.00 4/	106
4.	Good Government Federal Political Action Committee	N	11/09/87	1,000.00				
			11/13/87	1,000.00	1,000.00	4/15/88	1,000.00	154
5.	Hartford Insurance Group-PAC	Y	9/21/87	2,000.00				
			3/17/88	5,000.00	2,000.00	6/28/88	2,000.00	103
6.	Johnston for Congress	N	6/29/87	1,000.00				
			1/27/88	1,000.00	1,000.00			

1/ Qualified Multi-Candidate Committee (Y-Yes, N-No)

2/ Recorded and reported in the name of David Carney. Documentation does not establish that this contribution was earmarked.

3/ Taken from contributing committees' reports.

4/ Transferred to Committee's Compliance Fund.

9 3 0 4 0 9 5 2 5 1 4

Excessive Contributions from Political Committees

	Committee Name	Q1/	Contribution Dates	Contribution Amounts	Excessive Portions	Refunds Dates	Refunds Amounts	No. of Days to Refund
7.	The National Good Gov't Fund	Y	11/23/87	5,000.00				
			3/30/87	1,000.00	1,000.00			
8.	Non-Partisan Political Support Committee (G.E.)	Y	11/23/87	5,000.00 5/				
			12/24/87	1,000.00 5/	1,000.00			
			2/12/88	1,000.00 5/	1,000.00			
9.	U.S. Federation of Small Businesses PAC (Small BIZ PAC)	N	12/23/87	1,000.00				
			3/11/88	4,000.00	4,000.00	6/24/88	4,000.00	105
10.	Southwestern Beli Corp. Employee Federal PAC	Y	6/09/87	1,000.00 6/				
			6/30/87	1,000.00				
			6/30/87	375.00				
			8/19/87	1,000.00				
			11/03/87	1,000.00				
			12/03/87	1,000.00	375.00			
11.	Tele-Comm., Inc. PAC	N	11/24/87	2,000.00	1,000.00	3/04/88	1,000.00	101
			3/29/88	1,000.00	1,000.00			
	Total				$18,875.00			

5/ Contributor check is labeled as earmarked, however, no name is associated with the contribution.

6/ Recorded and reported in the name of Gary Andres. Documentation does not establish that this contribution was earmarked.

9 3 0 4 0 9 5 2 5 1 5

EXHIBIT
Attachment 3
Page 1 of 29

C-24,4 (2)

DOLE FOR PRESIDENT COMMITTEE INC

6-3-87
ESSOR DS
IVER DS

BATCH NUMBER 000945
DEP. CATEGORY IH PAC
TOTAL MAIL 2

TRIBUTORS
2

DOLLAR AMOUNT
2,000.00

-CONTRIBUTORS 6

930409525516

PLEASE LIST EACH CHECK SEPARATELY

23

000945 2:000 OK
2 items
IH
PAC

JUN 1987
Deposit to
SIGNET BANK VIRGINIA
Subject to
Verification

NORTHERN LOCK BOX

JUN 3 1987

ENTER TOTAL OF RECORDS

BY

DOLE FOR PRESIDENT COMMITTEE, INC.

	DOLLARS	CENTS
CURRENCY		
COINS		
FRONT SIDE TOTAL		
REVERSE SIDE TOTAL		
TOTAL DEPOSIT	2000	00

DATE 6-3-87

:055000408: 652=00247197

MF

LAST NAME: Arthur Young PAC Check No. 501

SALUTATION: _____

ACKNOWLEDGMENT TYPE: N/A

Other Required Information _____

1000

BANKERS TRUST COMPANY
NEW YORK, N. Y.

ARTHUR YOUNG & COMPANY
POLITICAL ACTION COMMITTEE
277 PARK AVENUE • NEW YORK, N.Y. 10017

1

№ 501

1-103
210

DATE May 21, 1987 $1,000.00

PAY ONE THOUSAND DOLLARS ---------- DOLLARS

TO THE ORDER OF Dole for President Exploratory Cmte.

ARTHUR YOUNG & COMPANY
POLITICAL ACTION COMMITTEE

Carl D Liggio
AUTHORIZED SIGNATURE

01 AD KS

⑈000501⑈ ⑆021001033⑆ 001-500269⑈

930409525517

EXHIBIT C
Attachment 3
Page 29

(2)

DOLE FOR PRESIDENT COMMITTEE INC

0.0

1,000.00+
100.00+
1,000.00+

003

2,100.00*

1-7-87

DATE 8-7-87
PROCESSOR SSun
REVIEWER DS

BATCH NUMBER 003306
DEP. CATEGORY IH PAC
TOTAL MAIL 3

CONTRIBUTORS	DOLLAR AMOUNT
3	2100.00

NON-CONTRIBUTORS 8

Bank of Virginia
A Signet Bank

CHECKING ACCOUNT DEPOSIT

8-7-87

AUG 1987

Subject to Verification

ACCOUNT NUMBER:

Checks and other items are received for deposit subject to the terms and conditions of the Bank's collection agreement.

		DOLLARS	CENTS
CASH		003306	
CHECKS	1	3	
	2	IH PAC	
	3		
	4	2100	00
TOTAL FROM OTHER SIDE			
SUB-TOTAL			
LESS CASH REQUESTED		NORTHERN LOCK BOX	
TOTAL ITEMS	TOTAL	2100	00

LESS OTHER SIDE FOR ADDITIONAL LISTING

AUG 7 1987

BY

(20)

:0560=0408: #652002471#

MF

CMF

9304095251 8

EXHIBIT C
Attachment 3
Page 4 of 29

Please comply with the following guidelines:

1. Make all checks payable to Bob Dole for President.
2. Corporate checks are prohibited by law.
3. Federal law limits contributions to $1,000 per person.

( ) I will attend the reception for Bob Dole on July 20, 1987.

( ) Sorry, I cannot attend. Enclosed is my check for $1,000.

( ) Sorry, I am unable to attend.

NAME David Carney 1000 P-A-A-B-A-A-A
(Please Print)

ADDRESS 277 Park Avenue

CO./ORG. Arthur Young & Co.

CITY New York STATE NY ZIP 10017

Paid for by Dole for President Exploratory Committee.

Att: WA

930409552519

BANKERS TRUST COMPANY
NEW YORK, N. Y.

ARTHUR YOUNG & COMPANY
POLITICAL ACTION COMMITTEE
277 PARK AVENUE • NEW YORK, N.Y. 10017

VERIFIED RJ (P) No 504

1-103
210

DATE July 23, 1987 $1,000.00

PAY ONE THOUSAND DOLLARS ---------- DOLLARS

TO THE ORDER OF Robert Dole for President
c/o John Miller
Providence Mutual Ins. Co.
1600 Market Street
Philadelphia, PA 19103

ARTHUR YOUNG & COMPANY
POLITICAL ACTION COMMITTEE

AUTHORIZED SIGNATURE

TCK PA

⑈000504⑈ ⑆021001033⑆ 001⑈500269⑆⑈

EXHIBIT
Attachment 3
Page 5 of 29

(7)

009378 20354 50

IH. PAC

12 Items

DEC 1987

Dominion
SIGNET BANK/VIRGINIA
Subject to
Verification

NORTHERN LOCK BOX

DEC 12 1987

Eva Andrews

BY

PLEASE LIST EACH CHECK SEPARATELY

DOLLARS | CENTS

ENTER TOTAL OF CHECKS HERE →

DOLE FOR PRESIDENT COMMITTEE, INC.

CURRENCY		
COINS		
FRONT SIDE TOTAL		
REVERSE SIDE TOTAL		
TOTAL DEPOSIT	20354	50

DATE 12-23-87

:056004084: 652-00247 19"

930409552520

DOLE FOR PRESIDENT COMMITTEE INC

DATE 12-23-87 BATCH NUMBER 009378

PROCESSOR _____ DEP. CATEGORY IH PAC

DELIVER KC TOTAL MAIL 12

CONTRIBUTORS DOLLAR AMOUNT

12 20,354.50

-CONTRIBUTORS _____

MF

EXHIBIT
Attachment 3
Page 6 of 29

BANKERS TRUST COMPANY
NEW YORK, N. Y.

ARTHUR YOUNG & COMPANY
POLITICAL ACTION COMMITTEE
277 PARK AVENUE • NEW YORK, N.Y. 10017

VERIFIED

No. 523

1-103
210

DATE December 9, 1987 $ 1,000.00

PAY ONE THOUSAND DOLLARS ---------- DOLLARS
TO THE ORDER OF Bob Dole for President

ARTHUR YOUNG & COMPANY
POLITICAL ACTION COMMITTEE

AUTHORIZED SIGNATURE

[redacted] Ø6-MSCT

"000523" :021001033: 001=500269"

930409525521

EXHIBIT
Attachment 3
Page 7 of 29

930409552522

BANKERS TRUST COMPANY
NEW YORK, N. Y.

ARTHUR YOUNG & COMPANY
POLITICAL ACTION COMMITTEE
277 PARK AVENUE • NEW YORK, N.Y. 10017

VERIFIED

№ 522

1-102
210

DATE December 9, 1987 $ 4,000.00

PAY FOUR THOUSAND DOLLARS---------- DOLLARS

TO THE ORDER OF Bob Dole for President

ARTHUR YOUNG & COMPANY
POLITICAL ACTION COMMITTEE

[redacted] 86-MSCT

AUTHORIZED SIGNATURE

⑈000522⑈ ⑆021001033⑆ 001-500269⑆⑈

EXHIBIT
Attachment 3
Page 8 of 29

(10)

LAST NAME: Fluor Public Affairs Committee Check No. 001298

SALUTATION: _____

ACKNOWLEDGMENT TYPE: NA

Other Required Information Betty Hudson
Public Affairs
PAC

5000

930409552523

FLUOR PUBLIC AFFAIRS COMMITTEE

3333 MICHELSON DRIVE
IRVINE, CALIFORNIA 92730
TELEPHONE: (714) 975-2000

VERIFIED RH 2

№ 001298

18-312
1220

June 19, 1987

PAY TO THE ORDER OF * * * DOLE FOR PRESIDENT EXPLORATORY COMMITTEE * * * * | $ 5,000.00

EXACTLY $5000 AND 00 CTS DOLLARS

CALIFORNIA CANADIAN BANK
1100 JAMBOREE BLVD. 714-752-6062
NEWPORT BEACH, CALIFORNIA 92660

07 RH DC

⑈001298⑈ ⑆122003134⑆005730308 3⑈

OAKLAND 812

Fetch # 1954

EXHIBIT
Attachment 3
Page 9 of 29

9

FLUOR PUBLIC AFFAIRS COMMITTEE VERIFIED RA

3333 MICHELSON DRIVE
IRVINE, CALIFORNIA 92730
TELEPHONE: (714) 975-2000

№ 001319

18-312
1220

10/16 1987

PAY TO THE ORDER OF BOB DOLE FOR PRESIDENT $ 2,000.00

TWO THOUSAND DOLLARS AND 00/100 XXXX

930409552525

Batch #
7354

GOOD GOVERNMENT FEDERAL
POLITICAL ACTION COMMITTEE
444 S. FLOWER ST.
LOS ANGELES, CA 90017

2

151

10/28 19 87 16-105/1220

PAY TO THE ORDER OF DOLE FOR PRESIDENT $*1,000.00

ONE THOUSAND DOLLARS AND 00/100 DOLLARS

BANKCAL THE BANK OF CALIFORNIA
Los Angeles Main Office
Los Angeles, California

VOID SIX MONTHS AFTER DATE OF ISSUE

Richard A Fink

⑆122001055⑆ 151-032-338053⑈

Batch #
7605

GOOD GOVERNMENT FEDERAL
POLITICAL ACTION COMMITTEE
444 S. FLOWER ST.
LOS ANGELES, CA 90017

VERIFIED 152

10/29 19 87

PAY TO THE ORDER OF DOLE FOR PRESIDENT $ *1,000.00

ONE THOUSAND DOLLARS AND 00/100 DOLLARS

BANKCAL THE BANK OF CALIFORNIA
Los Angeles Main Office
350 South Flower Street
Los Angeles, California 90071

VOID SIX MONTHS AFTER DATE OF ISSUE

MEMO

⑈122001055⑈ 152=032=338053⑈

930409525526

HARTFORD INSURANCE GROUP - P.A.C.
FEDERAL ACCOUNT
HARTFORD PLAZA
HARTFORD, CT 06115

229

September 3, 19 87 — 81-62 / 115

PAY TO THE ORDER OF Dole for President Committee — $ 2,000.00

Two-thousand dollars 00/100 ---------- DOLLARS

United Bank & Trust Company
Hartford, Connecticut

FOR 01-RANY

Lorraine K Zboril
Roger M. Tarr

⑈000229⑈ ⑆011900652⑆ 08-872 932 8⑈

930409552527

4707

HARTFORD INSURANCE GROUP - P.A.C. 242
FEDERAL ACCOUNT
HARTFORD PLAZA
HARTFORD, CT 06115

VERIFIED BA

February 22, 19 88 81-82/118

PAY TO THE ORDER OF DOLE for President Committee $ 5,000.00

Five-thousand dollars 00/100 DOLLARS

United Bank & Trust Company
Hartford, Connecticut

FOR 01-RANY

⑈000242⑈ ⑆011900652⑆ 08-872 932 8⑈

12537

930409552528

EXHIBIT
Attachment 3
Page 14 of 29

LAST NAME: Johnston For Congress Check No. 55

SALUTATION:

ACKNOWLEDGMENT TYPE: NA

Other Required Information Eugene Johnston
338 North Elm Street
Greensboro, North Carolina 27401

Executive Johnston Properties. 1000

Batch # 1800

930409552529

First Union National Bank
Greensboro, North Carolina 27402

2 - 55

June 8 1987 56-858 531

PAY TO THE ORDER OF Dole for President Exploratory Committee $1,000.00

One Thousand + no/100 DOLLARS

JOHNSTON FOR CONGRESS

Contribution 86-88-87

Mary D. Peterson

⑆053108580⑆ 7208645652

First Union National Bank
Greensboro, North Carolina 27402

VERIFIED

59

Jan. 21 19 88 56-859 631

PAY TO THE ORDER OF Dole for President

$ 4000.00

One Thousand & no/100 DOLLARS

Ø2-HMNC

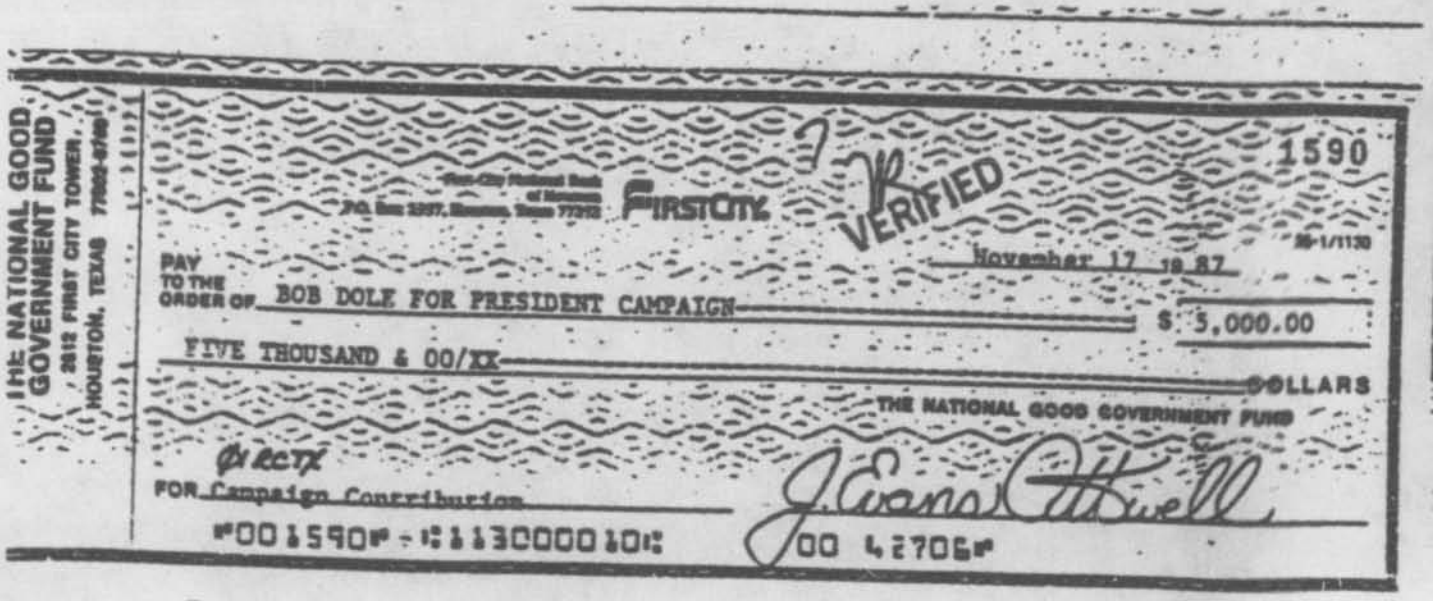
JOHNSTON FOR CONGRESS

FOR Contribution

Harry D. Bateman

⑈053108580⑈ 7208645652⑈

930409552530



THE NATIONAL GOOD GOVERNMENT FUND
2512 FIRST CITY TOWER
HOUSTON, TEXAS 77002-6760

First City National Bank of Houston
P.O. Box 2557, Houston, Texas 77252
FIRSTCITY

VERIFIED

1590

35-1/1130

November 17 19 87

PAY TO THE ORDER OF BOB DOLE FOR PRESIDENT CAMPAIGN $ 5,000.00

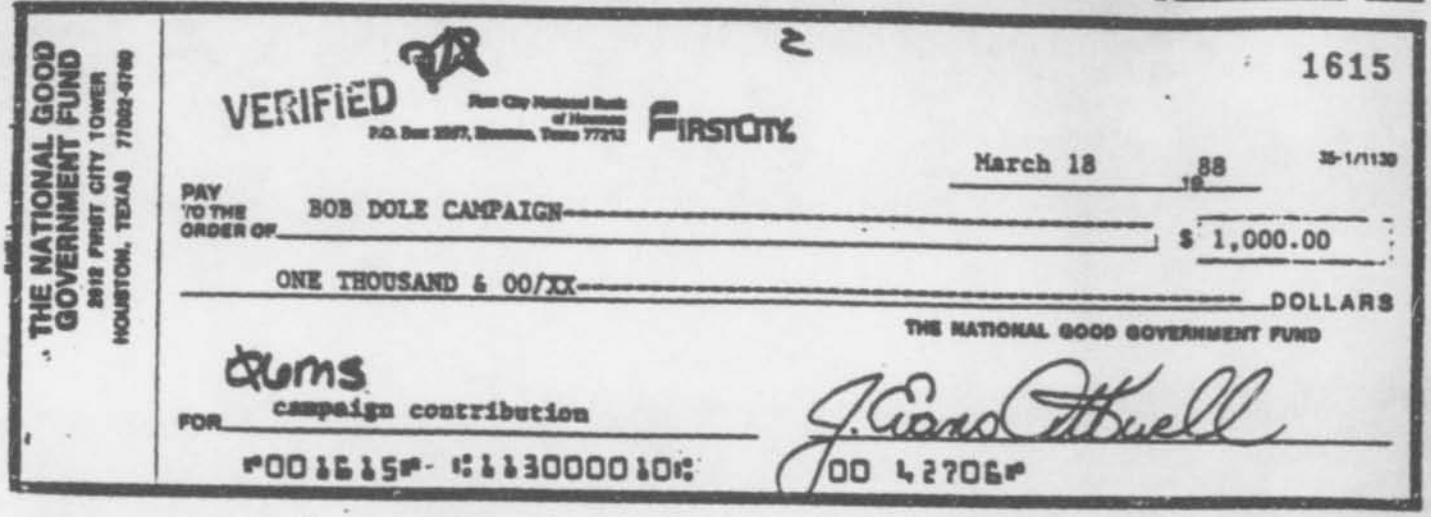
FIVE THOUSAND & 00/XX DOLLARS

THE NATIONAL GOOD GOVERNMENT FUND

FOR Campaign Contribution

J. Evans Attwell

⑈001590⑈ ⑆113000010⑆ 00 42706⑈



THE NATIONAL GOOD GOVERNMENT FUND
2512 FIRST CITY TOWER
HOUSTON, TEXAS 77002-6760

VERIFIED

First City National Bank of Houston
P.O. Box 2557, Houston, Texas 77252
FIRSTCITY

1615

35-1/1130

March 18 19 88

PAY TO THE ORDER OF BOB DOLE CAMPAIGN $ 1,000.00

ONE THOUSAND & 00/XX DOLLARS

THE NATIONAL GOOD GOVERNMENT FUND

FOR campaign contribution

J. Evans Attwell

⑈001615⑈ ⑆113000010⑆ 00 42706⑈

930409552531

EXHIBIT [redacted]
Attachment 3
Page 17 of 29

930409552532

Batch # 7996

(5)

NON PARTISAN POLITICAL
SUPPORT COMMITTEE
FOR GENERAL ELECTRIC
COMPANY EMPLOYEES
FAIRFIELD, CT 06431

9 JR VERIFIED

4453

51-32
211 85

November 12, 19 87

PAY TO THE ORDER OF Dole for President Committee, Inc. $ **5000.00**

**Five thousand and 00/100 DOLLARS

Connecticut National Bank 06-DCBE

Robert W. Nelson

David F St. Laurent

FOR (C00213850) 1988 Presidential - Primary
Earmarked

"004453" :021400329: 0607 9180"

9304095525533

(5)

NON PARTISAN POLITICAL
SUPPORT COMMITTEE
FOR GENERAL ELECTRIC
COMPANY EMPLOYEES
FAIRFIELD, CT 06431

4463

VERIFIED

December 3, 1987

PAY TO THE ORDER OF Dole for President Committee, Inc. $ **1000.00**

**One thousand and 00/100 DOLLARS

Connecticut National Bank

Robert W. Nelson

David F St. Laurent

FOR (C00213850) Presidential Primary

Earmarked

⑈004463⑈ ⑆021100329⑆ 0607 9180⑈

Batch # 9438

EXHIBIT
Attachment 3
Page 19 of 29

930409552534

NON PARTISAN POLITICAL SUPPORT COMMITTEE
FOR GENERAL ELECTRIC COMPANY EMPLOYEES
FAIRFIELD, CT 06431

4507

VERIFIED

February 1, 19 88

PAY TO THE ORDER OF Dole for President Committe, Inc. $ **1000.00**

**One thousand and 00/100 DOLLARS

Connecticut National Bank 06-MSCT

Robert W. Nelson
Vice Pres. & Asst. Treasurer

FOR (C00213850) 1988 Presidential Compliance Fund

Earmark

⑈4507⑈ ⑆021600329⑆ 0607 9180⑈

No record of this going to Compl. Fund.
Reported by DFP as being deposited 2/12/88

930409552535

Batch # 9378

(1)

Small BIZ-PAC
208 G Street, NE
Second Floor
Washington, D.C. 20002

VERIFIED

No. 50

November 23 1987

68-111
560

PAY TO THE ORDER OF Dole for President Committee

One Thousand and 00/100---------- $ 1,000.00 ----------DOLLARS

FIRST VIRGINIA BANK

FOR 01-HSTX

⑈056001118⑆ 0367 5548⑈

DEPOSIT TICKET

DATE 3/11 19 88

CURRENCY

COIN

CHECKS

IH

4 4 1 5 6 4 10,765

Batch #

DOLE FOR PRESIDENT

:056004089: 652-0024,719

MAR 1988

Signature Guaranteed by SIGNET BANK/VIRGINIA

Subject to Verification

SIGNET BANK

10,765

10,765

TOTAL ITEMS 1

930400952536

LAST NAME: Small BIZ-PAC CHECK NO. 51

SOLICITATION NAME:

SALUTATION:

ACKNOWLEDGMENT TYPE: NA

Other Required FEC Information:

Deposited 3/11/88

23040952537

Small BIZ-PAC
208 G Street, NE
Second Floor
Washington, D.C. 20002

No. 51

PAY TO THE ORDER OF Dole for President Committee — May 11, 1988 — 88-11/560

Four Thousand and 00/100 — $ 4,000.00 — DOLLARS

FIRST VIRGINIA BANK

FOR 01-HSTX

Carla Saunders

⑆056001118⑆ 0367 5548

EXHIBIT 8
Attachment 3
Page 23 of 29

C-31/11 (3)

LAST NAME: Andrus

SALUTATION: Gary

ACKNOWLEDGMENT TYPE: N A

Other Required Information

Check No. 1404

06-EB-07

PAC 1000

930409525538

SOUTHWESTERN BELL CORPORATION 0884
EMPLOYEE FEDERAL POLITICAL ACTION COMMITTEE
ONE BELL CENTER, ROOM 29-B-6
ST. LOUIS, MO 63101

1404

PAY TO THE ORDER OF Bob Dole for President Exploratory Committee May 22, 1987 $ 1,000.00

ONE THOUSAND AND NO/100---------- DOLLARS

Commerce Bank of St. Louis

FOR Primary 06-EB-07

⑈001404⑈ ⑆081004591⑆ 08311402 2⑈

Michael Kenfield

Batch # 107!

EXHIBIT
Attachment 1
Page 24 of 29

(3)

LAST NAME: SW Bell Corp. PAC Check No. 1414

SALUTATION: _____

ACKNOWLEDGMENT TYPE NA

Other Required Information _____ PAC

_____

_____

---------- 1000

93U4095525539

SOUTHWESTERN BELL CORPORATION 0884
EMPLOYEE FEDERAL POLITICAL ACTION COMMITTEE
ONE BELL CENTER, ROOM 29-B-8
ST. LOUIS, MO 63101

3

1414

PAY TO THE ORDER OF Bob Dole for President Exploratory Committee

June 26, 1987

80-468/810

ONE THOUSAND AND NO/100---------- $ 1,000.00 DOLLARS

Commerce Bank of St. Louis

FOR Presidential Primary 86-TC-F7

⑈001414⑈ ⑆081004591⑆ 083114022⑈

Batch # 1904

EXHIBIT C
Attachment 3
Page 25 of 29

(3)

LAST NAME: S.W. Bell PAC

SALUTATION: ~~Dear~~ Sirs

Check No. 1413

ACKNOWLEDGMENT TYPE NA

Other Required Information

375

PAC

23040952540

SOUTHWESTERN BELL CORPORATION 0884
EMPLOYEE FEDERAL POLITICAL ACTION COMMITTEE
ONE BELL CENTER, ROOM 29-S-6
ST. LOUIS, MO 63101

4

1413

PAY TO THE ORDER OF Bob Dole for President Exploratory Committee

June 19, 19 87

80-458/719

Three Hundred Seventy Five And No/100---------- $ 375.00

Commerce Bank of St. Louis

DOLLARS

FOR Primary Election 06-TC-F7

⑈001413⑈ ⑆081004596⑆ 08511402 2⑈

Batch # 1975

(3)

Batch # 380

LAST NAME: SW Bell Corp PAC CHECK NO. 1417

SALUTATION: _____

ACKNOWLEDGMENT TYPE: NA 1000

Other Required FEC Information: _____

_____

_____

93040952541

SOUTHWESTERN BELL CORPORATION 0864
EMPLOYEE FEDERAL POLITICAL ACTION COMMITTEE
ONE BELL CENTER, ROOM 29-S-6
ST. LOUIS, MO 63101

1417

PAY TO THE ORDER OF Bob Dole for President July 23, 1987 80-468/819

ONE THOUSAND AND NO/100 $ 1,000.00 DOLLARS

Commerce Bank of St. Louis

FOR Presidential Primary Ø1-JHKS

⑈001417⑈ ⑆081004594⑆ 0831140228⑈

EXHIBIT
Attachment 3
Page 27 of 29

(3)

SOUTHWESTERN BELL CORPORATION 0884
EMPLOYEE FEDERAL POLITICAL ACTION COMMITTEE
ONE BELL CENTER, ROOM 29-S-6
ST. LOUIS, MO 63101

VERIFIED (1)

1452

80-486/810

PAY TO THE ORDER OF Bob Dole for President

October 21, 1987

$ 1,000.00

ONE THOUSAND AND NO/100 DOLLARS

Commerce Bank of St. Louis

FOR Primary - Presidential

⑈001452⑈ ⑆081001459⑆ 083114022⑈

Michael Kaufman

Batch # 704

930409525542

EXHIBIT
Attachment 3
Page 20 of 29

SOUTHWESTERN BELL CORPORATION 0664
EMPLOYEE FEDERAL POLITICAL ACTION COMMITTEE
ONE BELL CENTER, ROOM 29-S-6
ST. LOUIS, MO 63101

CRIFIED 2

1456

10-468/810

November 13, 19 87

PAY TO THE ORDER OF Dole for President Committee $ 1,000.00

ONE THOUSAND AND NO/100 DOLLARS

Commerce Bank of St. Louis

FOR Primary #6 DC BE

#001456# :081000459#: 0831140 22#

B. Ltr # 413

930409525543

Batch # 12767

TCI PAC
CALL BOX 22896, WELLSHIRE STATION
DENVER, COLO. 80222

106

3/3/ 1988

PAY TO THE ORDER OF Hale for President Committee $ 1,000 00

One Thousand and NO/100 DOLLARS

COLORADO NATIONAL BANK
TECH CENTER
8401 East Belleview (303) 771-7071
Denver Colorado 80237

Colin R. Hale
Hayek Brown

⑈10200347⑆0106 ⑈014146⑈

Batch # 8154

TCI PAC
CALL BOX 22896, WELLSHIRE STATION
DENVER, COLO. 80222

104

11/3/ 1987

PAY TO THE ORDER OF Hale for President Committee $ 2,000 00

Two Thousand and NO/100's DOLLARS

COLORADO NATIONAL BANK
TECH CENTER
8401 East Belleview (303) 771-7071
Denver Colorado 80237

Colin R. Hale

MEMO COLORADO 84-JHIA

⑈10200347⑆0104 ⑈014146⑈

23004095225444

EXHIBIT B
ATTACHMENT 1
Page 1 of 2

Corporate Air Travel - Not Paid In Advance

	Corporation	Check Amount	Check Date	Travel Date(s)	Committee Check Request Date
1.	American Financial Corp.	$1,038.00*	6/25/87	?	6/21/87
		495.00*	8/31/87	8/29/87	8/31/87
2.	Becon Construction Company, Inc.	9,987.85	4/07/88	1/18/88, 2/25-2/27/88 3/05/88, 3/08/88	4/07/88
		1,500.00	4/01/88	12/03/87, 12/12/87	2/25/88
3.	B & G Investments	4,398.00*	2/08/88	2/06/88-2/07/88	2/06/88
4.	Browning-Ferris Industries	630.00	7/08/87	5/01/87, 6/27/87	7/07/87
		1,254.00	3/15/88	3/07/88	
		1,280.00	3/24/88	7/28/87, 10/11/87 11/18/87	3/15/88
		2,709.00*	5/05/87	5/01/87-5/03/87	5/05/87
		2,414.00*	11/20/87	11/17/87-11/18/87	11/16/87
5.	Businessmen's Assurance Company	676.00	4/24/87	4/14/87	4/14/87
6.	The Coastal Corporation	166.00*	8/20/87	8/17/87	8/18/87

*Although not paid in advance, payment was made within 5 days after the dates of travel (13 payments totaling $19,787.00).

Corporate Air Travel - Not Paid In Advance

	Corporation	Check Amount	Check Date	Travel Date(s)	Committee Check Request Date
7.	Contran	1,662.00	2/03/88	1/12/88	2/02/88
		1,571.00	3/24/88	3/14/88	3/24/88
		1,571.00	4/01/88	3/14/88	3/14/88
8.	The Home Insurance Co.	1,430.00*	4/24/87	4/20/87	4/20/87
9.	Long Lines Limited	3,880.00	12/31/87	12/23-12/24/87	12/31/87
10.	Owen and Associates	9,905.00	5/06/88	Various Dates 3/24-11/09/87	4/28/88
11.	Pfiser Corporation	178.00*	9/11/87	9/10/87	-
12.	Refco	441.00*	2/03/88	2/01-2/02/88	2/02/88
13.	Stephens, Inc.	330.00	6/19/87	5/13/87	6/19/87
		1,022.00*	12/8/87	12/5-12/6/87	12/8/87
		1,250.00*	3/04/88	3/01/88	3/04/88
14.	Torchmark Corporation	3,265.00*	3/02/88	2/27/88	3/02/88
		981.00*	4/07/88	4/02/88	4/06/88
15.	Winston Network, Inc.	231.00	1/29/88	1/21/88	1/29/88
	TOTAL	$ 54,264.85			

9304095254 7

Exhibit A
Attachment 1
Page 1 of 13

Listing of Possible Corporate Contributors by Corporate Name--Unl- Run Date: 06/07/1990 Page: 1

Batch Number	Business Name	Last Name	First Name	M I.	Deposit Date	Contribution Amount	Incorp Date	ZIP	Address 1	Address 2	City	State	Zip	Refund Information Date	Refund Information Amount	Refund Information # of Days
12835	AD ASTRA, LTD.	LEONARD	RAYMOND	S	03/31/1988	25.00	12/15/1986	574	RT 1 BOX 92LLL		SANTA FE	NM	87501			
11157	AIR MARINE CARGO SERVICES, D/B/A/ MAC CARGO SERVICES				02/11/1988	24.00	12/29/1981	814	6856 NW 77TH COURT		MIAMI	FL	33166			
8261	AL ADAMS RARE COINS, INC	SIDES	CELESTE	D	11/30/1987	50.00	11/04/1980	285	ABERNATHY SQ . 4411 C BOSWELL ROAD		ATLANTA	GA	30338			
11187	ALMAR ASSOCIATES, INC.	BERGENFUS	ALLEN	R	02/10/1988	25.00	10/09/1980	798	14 HULLY COURT		WOODCLIFF LAKE	NJ	07675			
999879	ALTMAN BROTHERS				12/31/1987	1,000.00	08/02/1955	650	115 NEW STREET		GLENSIDE	PA	19038	6/17/88	$2,000.00*	12/31/87-6/17/88 169
9637	AMERICAN GENLALOGICAL LENDING LIBRARY				12/30/1987	25.00	05/05/1983	329	P.O. BOX 244		BOUNTIFUL	UT	84010			
12326	AMERICAN GENEALOGICAL LENDING LIBRARY	STEWART	RAEONE		03/04/1988	15.00	05/05/1981	503	P.O. BOX 244		BOUNTIFUL	UT	84010			
9938	AMERICAN STANDARD APPLIANCE PROTECTION OF COLORADO SPRINGS	STARKEY	DELFRED	J	01/06/1986	25.00	01/01/1986	366	4125 NORTH CARE FREE		COLORADO SPRINGS	CO	80917			
7201	AMERICAN STANDARD APPLIANCE PROTECTION OF COLORADO SPRINGS	STARKEY	DELFRED	J	11/05/1987	25.00	01/01/1986	626	4125 N. CARE FREE		COLORADO SPRINGS	CO	80917			
10925	AMERICAN STANDARD APPLIANCE PROTECTION OF COLORADO SPRINGS	STARKEY	DELFRED	J	02/04/1988	25.00	01/01/1986	1000	4125 NORTH CARE FREE		COLORADO SPRINGS	CO	80917			
6927	ANDREW HEYL, P.A., ATTORNEY AT LAW	HEYL	ANDREW		10/30/1987	150.00	04/10/1986	1450	11000 WEST 87TH ST. SUITE 210		LENEXA	KS	66215			
3636	BALLET LIMITED PARTNERS				08/14/1987	1,000.00	07/22/1986	1565	1611 N. OLDEN AVENUE		TRENTON	NJ	08638			
6559	BERNARD SUSSMAN, M.D.	SUSSMAN	BERNARD	M	10/23/1987	100.00	04/01/1972	876	40 W. PAULINE		MEMPHIS	TN	38105			
9753	BERTRAM ASSOCIATES				12/31/1987	2,000.00	12/28/1981	111	1001 BERTRAM TERRACE		UNION	NJ	07083			
10071	BRUCE M. SOLOMON, D.C., P.A.	SOLOMON	B.M.		02/05/1988	115.00	07/19/1983	1002	3401 FLAGLER AVE		KEY WEST	FL	33040			
6853	C. EDOUARD ST MARTIN ASSOCIATES, INC.	ST. MARTIN	J. EDWARD		10/28/1987	500.00	01/02/1983	912	154 RUSSELL ST.		WORCESTER	MA	01609	2/15/88	$500.00	10/28/87-2/15/88 110

○ - Committee has submitted signed contributor statements indicating source (personal funds.

* Unverified refund

Listing of Possible Corporate Contributors by Corporate Name--Date Run Date: 06/07/1990 Page: 2

Batch Number	Business Name	Address 1	Address 2	City	State	Zip			
Last Name	First Name	M I	Deposit Date	Contribution Amount	Incorp Date	EIN			
13917	CAPITAL CITY CREDIT UNION	1800 HARRISON		TOPEKA	KS	66612			
PARKER	GILBERT	B	04/11/1988	120.00	03/24/1976	561			
7866	CEDAR HILL RESORT	ROUTE 1		CELINA	TN	38551	6/28/88	20.00*	11/3/87-6/28/88 238
ROBERTS	B.I.		11/03/1987	20.00	06/18/1959	668			
7617	CHARLES E. HANAWEI ROOFING COMPANY	1953 OHIO		WICHITA	KS	67214			
BOYD	MICHAEL	L	11/13/1987	250.00	06/09/1931	1378			
7810	CITIZENS ACTION TEAM	P O BOX 833		STONE MOUNTAIN	GA	30086			
	D	D	11/09/1987	100.00	01/09/1987	1307			
3636	CLINTON COMMONS ASSOCIATES	1821 N. OLDEN AVENUE		TRENTON	NJ	08638			
			08/14/1987	1,000.00	04/22/1985	1569			
7203	COLONIAL CARPETS	28 HARLOW ST.		BANGOR	ME	04401			
OLSON			11/05/1987	15.00	03/10/1977	687			
6835	COLONIAL CARPETS	28 HARLOW ST.		BANGOR	ME	04401			
			10/30/1987	15.00	03/10/1977	900			
11597	COLUMBIA MANAGEMENT	137 WASHINGTON STREET		NORWELL	MA	02061			
GERRMANN	SANDRA	L	02/23/1988	200.00	08/17/1977	667			
5462	COLUMBIA MANAGEMENT	137 WASHINGTON STREET		NORWELL	MA	02061			
GERRMANN	SANDRA	L	09/30/1987	500.00	08/17/1977	1195			
11883	COMMITTEE FOR HUMANE L ISLATION, INC.	11 WEST 60TH STREET		NEW YORK	NY	10023			
PERAL	PRISCILLA		03/29/1988	1,000.00	03/02/1967	24			
12304	COMPUTER MANAGEMENT SERVICES CO.			NEW CUMBERLAND	PA				
GRUNDINS			03/10/1988	1,000.00	12/15/1978	515			
10340	CY CARNEY INVESTMENT CO.	PO. 8 YARA MOUNT		JACKSONVILLE	AR	72076	4/28/88	20.00	1/15/88-4/28/88
CARNEY, JR.	CY		01/15/1988	20.00	01/10/1955	1315			
5013	D & D INVESTMENTS	3941 SOUTH FAIRWAY DRIVE		TEMPE	AZ	85282			
GULLEY	DONALD	B	10/09/1987	25.00	05/20/1986	1274			
2614	D-2 COMPANY, THE FIRST PLACE	6821 EAST KELLOGG		WICHITA	KS	67207			
DODSON	B.	J	07/15/1987	1,000.00	04/26/1974	1585			
2614	DANIEL M. CASE, A LAW CORPORATION	2040 AHUALANI PLACE		HONOLULU	HI	96809	1/29/88	$100.00	7/15/87-1/29/88 198
CASE	DANIEL	B	07/15/1987	100.00	06/01/1980	22			
	DANIEL L. TEDESCO, P.A., ATTORNEY AT LAW - GENERAL ACCOUNT	320 SE 9TH STREET		FT. LAUDERDALE	FL	33316			
TEDESCO	DANIEL	L	06/06/1987	250.00	03/14/1984	342			
12148	DENCO-8 LTD.			SCHLESWIG	IA	51461			
BROWN	DENNIS	B	03/04/1988	100.00	12/14/1978	1113			
10615	DENNIS L. DOUGLAS, ATTORNEY AT LAW	501 LINCOLN BLDG		SPOKAN	WA	99201			
DOUGLAS	DENNIS	L	01/27/1988	50.00	07/01/1980	956			

Listing of Possible Corporate Contributors by corporate name - Data Run Date: 06/07/1990 Page: 3

Batch Number	Business Name	Last Name	First Name	M I	Deposit Date	Address 1	Contribution Amount	Incorp Date	Address 2	City	State	Zip			
11110	DISCALCED CARMELITE MONASTERY	TERESA	MOTHER MARY		02/10/1988	2301 WEST MAIN STREET	75.00	07/25/1961	808	JEFFERSON CITY	MO	65101			
6813	DISCALCED CARMELITE MONASTERY	SR. MARY TERESA			10/20/1987	2301 WEST MAIN STREET	32.00	07/25/1961	1432	JEFFERSON CITY	MO	65101			
1501	DR. FAISSAL ZAMRAWI				06/17/1988	35100 EUCLID ST 360	50.00	08/31/1979	1590	WILLOUGHBY	OH	44094			
6832	DUFFY CONSTRUCTION COMPANY	DUFFY	DORIS		10/20/1987	P O BOX 42	25.00	05/10/1978	1436	THE DALLES	OR	97058	6/28/88	25.00*	10/28/87-6/28/88 244
8821	DURHAM FUNERAL HOM.	DURHAM	JAS. J	S	12/10/1987	305 KENTUCKY AVENUE	100.00	06/19/1963	1342	...EVILLE	KY	40977			
8137	E. G. MUS. ATTORNE. AT LAW	MUSLEH		G	11/24/1987	P O BOX 926	200.00	02/23/1978	1345	OCALA	FL	32676			
6557	EARL D. MEARES, M.D.				10/21/1987	SHIELDS BLDG.	75.00	01/16/1978	871	RUSSELL	KS	67665			
4963	EAST STATE STREET ASSOC. LP	ILLEGIBLE			09/22/1987	1421 OLDER AVENUE, N	1,000.00	01/15/1987	1266	TRENTON	NJ	08638			
5399	EDWARD WHITE & CO.	WHITE	EDWARD		08/10/1987	5850 CANOGA AVENUE, SUITE 200	1,000.00	10/02/1980	1170	WOODLAND HILLS	CA	91367			
6658	EDWIN D. RATHBUN, M.D., F.A.A.F.P., P.A.				10/26/1987	610 WEST ELEVENTH ST.	50.00	05/22/1973	882	LIBERAL	KS	67901			
7206	ELBERT EXTERMINATING CO.	ELBERT	ED	A	11/05/1987	P.O. BOX 4868	20.00	05/01/1962	1101	WINTER PARK	FL	32793	6/28/88	$29.00*	11/5/87-6/28/88 [illegible]
707	EMMETT B. REILLY, M.D.	REILLY	EMMETT	B	05/22/1967	7000 ARIZONA	25.00	10/21/1974	91	LOS ANGELES	CA	90045			
13214	EMMETT B. REILLY, M.D.	REILLY	EMMETT	B	03/16/1988	7000 ARIZONA	20.00	10/21/1974	494	LOS ANGELES	CA	90045			
11752	ERIC M. FONDALSBUD, M.D.	FONDALSBUD	ERIC	M	02/26/1988	626 34TH ST.	100.00	12/28/1979	1069	SANTA MONICA	CA	90402			
3965	F.D. REES MANUFACTURING COMPANY	SCHAEFER	GEO.		08/31/1987	700-800 PARK AVENUE	30.00	02/28/1947	1141	BEATRICE	NE	68310			
1196	F.E. SCHAFFER, D.D.S., ORAL AND MAXILLO FACIAL SURGEON	SHAFFER	F.E.		06/11/1987	2602 CUNNINGHAM	50.00	10/04/1985	381	JOPLIN	MO	64801			
10157	FAIR LANE FARMS	DORRO	M	E	01/13/1986	R.R. 4, BOX 226	25.00	01/05/1971	346	MT. PLEASANT	IA	52641			
7866	FORMS MANAGEMENT	OSBORNE	JOHN	M	11/03/1987	P.O. BOX 1322	50.00	01/08/1979	670	WICHITA	KS	67201			

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Batch Number	Business Name	Last Name	First Name	MI	Deposit Date	Address 1	Contribution Amount	Incorp Date	FID	Address 2	City	State	Zip				
3393	HARRY E. WEBB, M.D.	WEBB	HARRY		01/14/1987	4400 BROADWAY, SUITE 502	250.00	09/28/1971	412		KANSAS CITY	MO	64111				
11891	HARRY E. WEBB, M.D.	WEBB	HARRY	E	02/29/1988	4400 BROADWAY, SUITE 502	250.00	09/28/1971	464		KANSAS CITY	MO	64111				
5641	HARRY E. WEBB, M.D.	WEBB	HARRY	E	10/26/1987	4400 BROADWAY, SUITE 502	500.00	09/28/1971	881		KANSAS CITY	MO	64111				
7651	HARRY L. MANNING, M.D., ASSOC., OFFICE ACCOUNT	MANNING	HARRY	L	11/09/1987	699 RURAL AVENUE	35.00	01/01/1982	75		WILLIAMSPORT	PA	17701	2/15/88	$25.00	11/9/87-2/15/88	98
11668	HERREID AGENCY	HERREID	JAMES		02/24/1988	SUITE NO 3, II BRIDGE SQUARE	10.00	07/01/1976	1073		NORTHFIELD	MN	55057				
5867	HUGHES ENTERPRISES	BAILEY	VICKI	C	12/16/1987	P O BOX 35867	500.00	05/13/1982	1139		TULSA	OK	74151				
11107	INTERADD OF NEW HAMPSHIRE	WALLEN	LUTE	H	02/10/1988	WOODMAN ROAD	60.00	11/05/1987	787		SOUTH HAMPTON	NH	03827				
12304	INVESTORS DEVELOPMENT GROUP	ADAMS	GEORGE	J	03/10/1988	1013 HUMMA ROAD	500.00	03/04/1981	516		WORMLEYSBURG	PA	17043				
11501	J & J INVESTMENTS	BARBOARES	JOY ANNE		02/22/1988	1016 MARCIE LANE	35.00	06/05/1985	1057		MILFORD	OH	45150				
11488	J.A. JAMES CONSTRUCTION CO.	HALBERDAR	JAMES	A	02/19/1988	P O BOX 2313	100.00	06/08/1984	840		IRWINDALE	CA	91706	6/28/88	$100.00*	2/19/88-6/28/88	130
	J.W. (JACK) HUTT CO.	HUTT	J	W	06/08/1987	P.O. BOX 198	250.00	11/08/1973	141		NORTH LITTLE ROCK	AR	72115				
2463	J.W. (JACK) HUTT CO.	HUTT	JEAN	L	07/15/1987	P.O. BOX 198	200.00	11/08/1973	416		NORTH LITTLE ROCK	AR	72115				
4976	J.W. (JACK) HUTT CO.	HUTT	J	W	09/22/1987	P.O. BOX 198	400.00	11/08/1973	1152		NORTH LITTLE ROCK	AR	72115	12/21/87	400.00	9/22/87-12/21/87	90
3965	J.W. (JACK) HUTT CO.	HUTT	JOAN		08/21/1987	P.O. BOX 198	500.00	11/08/1973	1227		NORTH LITTLE ROCK	AR	72115	11/24/87	75.00	8/21/87-11/24/87	95
433	JAMES A. HOLLIDAY,M.D.,P.A.				05/11/1987	6700 N.MACARTHUR BLVD.	50.00	05/25/1984	682		TAMPA	FL	33614				
7984	JAMES M. GALLIRO, M.D., P.A.	GALLIRO	JAMES	M	11/19/1987	1892 SUFORD BOULEVARD	66.66	06/30/1985	162		TALLAHASSEE	FL	32308				
30	JAMES P. RYAN, PA	RYAN	JAMES	P	06/08/1987	320 SOUTHEAST 9TH STREET	250.00	02/10/1982	389		FT. LAUDERDALE	FL	33316				
11611	JEROME D. FLADEN, M.D.	FLADEN	JEROME		03/23/1988	1310 TIMBER MESA DR. N.W. 3310	35.00	07/01/1972	1591		CANTON	OH	44708				

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941 JEROME D. FLADEN, M.D.				05/15/1987	15.00	07/01/1972	1592	1330 TIMBER MESA DR. N.W. #310		CANTON	OK	44708				
6960 JIM TRAMP CONSTRUCTION TRAMP		JIM		12/15/1987	25.00	09/15/1972	1341	2400 HULSEBOY		TANNTON	SD	57078				
4166 JIM'S PHARMACY P.A., MOVERY CLINIC CRAM		JAMES		08/26/1983	50.00	01/18/1966	1588	717 EAST CRAWFORD		SALINA	KS	67401	10/30/87	$ 50.00	8/26/87-10/30/87	65
11170 JOE L. MORTON, P.A. MORTON		JOE	L	01/12/1968	1,000.00	12/30/1961	811	ONE MAIN PLACE, SUITE 800		WICHITA	KS	67202	9/26/88	1,000.00	2/12/88-9/26/88	227
11670 JOHN GARDNER FARMS GARDNER		JOHN		02/19/1968	50.00	04/17/1975	842	ROUTE 1, BOX 121		LAMAR	MO	64759				
7262 JOHN W. YOUNG, M.D., P.A. YOUNG		A	D	11/05/1987	250.00	12/31/1973	1299	8220 TRAVIS, SUITE 115		OVERLAND PARK	KS	66204				
5383 JOSEPH A. LOYA, D.D.S., P.A. LOYA		JOSEPH	A	09/30/1987	100.00	09/21/1976	1176	143 DAYTON STREET		RIDGEWOOD	NJ	07450				
11365 KENNETH E. HOFF, M.D. HOFF		KEN		01/16/1968	100.00	06/01/1964	821	816 MAIN STREET		ROCHESTER	IN	46975				
999954 KEY ENTERPRISES ROGERS		B.B.		03/17/1987	100.00	09/16/1976	1470	5501 COMANCHE		GREAT BEND	KS	67530				
9161 KILBOURNE INVESTMENT COMPANY MCLAIN		JUDI		12/18/1987	50.00	08/12/1970	188	1465 JUNIPER HILL ROAD		POCATELLO	ID	83204				
6631 KNIX INTERNATIONAL COLOR LTD F				09/11/1987	1,000.00	03/31/1971	1236	111 8TH AVENUE		NEW YORK	NY	10011				
12775 L.P. REED RANCH REED		JESSIE	M	03/29/1988	40.00	12/19/1973	1393	BOX 557		MERIDIAN	TX	76665				
2645 LAUREN E. WELCH, M.D. WELCH		LAUREN	E	03/23/1987	750.00	04/24/1980	620	3261 E. MURDOCK, SUITE 601		WICHITA	KS	67208				
8364 LAW OFFICES OF RICE & REISER, P.A. REISER				12/01/1987	100.00	08/06/1965	1358	1350 NORTHWEST 10TH AVENUE		MIAMI	FL	33125	9/26/88	100.00	12/1/87-9/26/88	300
11653 LE TRIANON JEWELRY CHOI		A.		03/24/1988	25.00	05/23/1984	98	CENTRAL SHOPPING PL. 3867 NW 7TH ST		MIAMI	FL	33126				
5533 LESLIE ENTERPRISES LESLIE		ROBERT	G	12/04/1987	1,000.00	10/04/1974	155	P.O. BOX 4856		SAYCOT	CA	93064				

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Batch Number	Business Name	Last Name	First Name	M I	Deposit Date	Address 1	Address 2	City	State	Zip	Contribution Amount	Incorp Date	EID			
2416	LIDA ADVERTISING COMPANY	LIDA	BOB		01/15/1987	393 N. MCLEAN BOULEVARD		WICHITA	KS	67203	1,000.00	12/27/1978	17	9/30/87	$1,000.00	7/15/87-9/30/
7196	LOS ANGELES DRYWALL				11/04/1987	1940 GILMAN STREET		LONG BEACH	CA	90813	1,000.00	01/02/1987	603			
999996	LYNN D. RETCHUN, M.D.	RETCHUN	LYNN	E	02/10/1987	12101 WEST 106TH, SUITE 201		OVERLAND PARK	KS	66213	250.00	09/26/1978	655			
5006	M-3 ASSOCIATES	JORDEN	MARK		09/24/1987			NEW YORK	NY	10022	1,000.00	01/01/1985	1208			
10910	MANDARIN PHARMACY				01/04/1988	895 WASHINGTON ST.		SAN FRANCISCO	CA	94108	35.00	04/15/1978	783			
7661	MARKO ENTERPRISES	SWEENEY	MARK		11/10/1987	P O. BOX 90859		SANTA BARBARA	CA	93190	20.00	09/04/1979	704			
9879	MARTIN M. TAPLIN, ATTORNEY AT LAW	TAPLIN	MARTIN	M	01/06/1988			MIAMI	FL		1,000.00	04/28/1986	1579			
6361	MAS S. OLTJEN LAND & CATTLE CO.	OLTJEN	MARILYN		11/30/1987	BOX 265		MIAMATHA	KS	66434	50.00	10/13/1975	1336			
930	MCCARTHY & MCCARTHY	MCCARTHY	MELANIE	R	06/01/1987	1900 NORTH ATLANTIC AVE., SUITE 1936		COCOA BEACH	FL	32931	25.00	10/22/1984	1595	1/29/88	25.00	6/2/87-1/29/88 241
9130	MCVEAN AND COMPANY	P			09/25/1987	850 RIDGE LAKE BLVD, SUITE G-01		MEMPHIS	TN	38119	1,000.00	07/25/1984	1157			
12601	MEERS MANAGEMENT CO.	MEERS	BILLY		03/23/1988	P.O. BOX 2071		LUBBOCK	TX	79408	65.00	02/05/1987	546			
7261	MICHAEL M. BARBARICH, M.D., P.C.	BARBARICH	M		11/05/1987	P.O. BOX 709		ESCANABA	MI	49829	100.00	07/21/1975	64	4/15/88	100.00	11/5/87-4/15/88 162
2365	MIRALIC PROPERTIES	MIRALIC	OLGA	M	06/10/1987	5300 OBERLIN AVE.		LORAIN	OH	44053	25.00	07/07/1983	388			
999954	MILLER RANCH	MILLER	TIM		03/17/1987	115 PATTON RD.		GREAT BEND	KS	67530	500.00	07/01/1976	1472			
7196	MILLER, CANFIELD, PADDOCK AND STONE				11/04/1987	2500 COMERICA BUILDING		DETROIT	MI	48226	1,000.00	06/15/1987	61			
2130	MILTON FENSTER ASSOCIATES	FENSTER	MILTON		09/25/1987	500 MADISON AVENUE		NEW YORK	NY	10022	1,000.00	04/30/1970	1253			
313	MODERN DEVELOPMENT CO.	HARDON	DONALD		04/26/1967	7661 E. SOMERSET BLVD		PARAMOUNT	CA	90723	150.00	05/19/1983	366			

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Batch Number	Business Name	Address 1	Address 2	City	State	Zip
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7795	G & L FARMS, INC.			1213 NORTH COMANCHE, BOX 56		ULYSSES	KS	67880
	ADAGI / GLNO		11/17/1987	25.00	12/11/1975	1396
8288	G. J. "PETE" DANHOFF, O.D.			615 SECOND STREET		IDA GROVE	IA	51445
	DANHOFF / PETE		10/19/1987	50.00	06/22/1987	1384
12950	G.C. MORROW, D.D.S.			106 FIFTH AVE., SUITE 1105		PITTSBURGH	PA	15222
	MORROW / G.C.		04/15/1988	50.00	09/17/1971	588
10525	G.C. MORROW, D.D.S.			106 FIFTH AVE., SUITE 1105		PITTSBURG	PA	15222
	MORROW / G.C.		01/25/1988	100.00	09/17/1971	747
1352	G.C. MORROW, D.D.S.			100 FIFTH AVENUE, SUITE 1105		PITTSBURGH	PA	15222
	MORROW / G.C.		06/16/1987	100.00	09/17/1971	1481
1432	GEORGE ESCHBAUGH ADVERTISING			BOX 130		WILSON	KS	67690
			06/10/1987	600.00	07/21/1975	168
999674	GIBSON DEAN II, P.C., ATTORNEY AT LAW			P.O. BOX 910		BUFORD	GA	30518
	DEAN / DEANE	J	12/31/1987	30.00	08/12/1985	631
12367	GILBERT D. SMALL, D.D.S., ORAL AND MAXILLOFACIAL SURGERY			1301 PACKARD		ANN ARBOR	MI	48104
	SMALL / GILBERT	R	03/11/1988	100.00	03/29/1972	519
2600	GIVENS CONSTRUCTION			P.O. BOX 19516		LOS ANGELES	CA	90019
	GIVENS / ERIC		07/31/1987	100.00	10/30/1986	1532
10943	GLICKENHAUS & CO.			6 EAST 43RD STREET		NEW YORK	NY	10017
			02/05/1988	1,000.00	06/15/1981	785
999936	GREAT PLAINS UROLOGY, PA			3520 LARIM, SUITE 100		GREAT BEND	KS	67530
	DEAN / VICKI		03/25/1987	100.00	09/29/1983	1471
12739	GROSBAHL FARMS			BOX 136		LITTON	IA	50561
	GROSBAHL / RODNEY		01/28/1988	1,000.00	05/10/1982	1380
11883	GUARDIAN TITLE AGENCY			P.O. BOX 6811		LAWRENCEVILLE	NJ	08648
	GREEN / DAVID		02/29/1988	1,000.00	11/30/1977	37
	G B & W AVIATION			5400 NORTH BROADWAY STE8 IN-KIND		OKLAHOMA	OK	73114
				2,750.00	06/16/1983	1596
12131	H. FREDERICK HEIDER, M.D.			P.O. BOX 3326		WINTER HAVEN	FL	33883
	HEIDER / H. FREDERICK		02/11/1988	5.00	10/01/1976	1015
6015	H.H. BLAIR OIL COMPANY			LAST R. RANCH		ATLANTA	GE	47666
	BLAIR / BETTY		10/20/1987	50.00	12/22/1980	962
12335	H.L. COMPTON, M.D			800 CASS ST. STE 209		MONTEREY	CA	93940
	COMPTON / H.L.		03/08/1988	24.00	07/21/1977	510

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Batch Number	Business Name / Last Name	First Name	MI	Deposit Date	Address 1 / Contribution Amount	Address 2 / Incorp Date	EID	City	State	Zip				
13360	MODERN DEVELOPMENT CO.				7801 E. SOMERSET BLVD.			PARAMOUNT	CA	90723				
	BARBONE	DONALD	J	01/18/1988	250.00	06/19/1981	533							
9118	MODERN DEVELOPMENT CO				7801 E SOMERSET BLVD.			PARAMOUNT	CA	90723				
	BARBON	DONALD	J	12/17/1987	100.00	06/19/1981	746							
11678	MODERN DEVELOPMENT CO				7801 E. SOMERSET BLVD.			PARAMOUNT	CA	90723				
	BARBON	DONALD		02/19/1988	100.00	06/19/1981	611							
10670	MODERN DEVELOPMENT CO.				7801 E. SOMERSET BLVD.			PARAMOUNT	CA	90723				
	BARBON	DONALD		01/28/1988	250.00	06/19/1981	638							
2199	B.W. BETTIGOLE CO., C[illegible] ENGINEERS				601 BERGEN MALL			PAR[illegible]	NJ	07652				
	BETTIGOLE	W.	B	09/30/1987	500.00	01/08/1979	1177							
376	NASIR U. BHAJA, M.D.				3655 LOMITA BLVD			TORRANCE	CA	90505				
				05/06/1987	50.00	07/09/1975	77							
11931	NASIR U. BHAJA, M.D.				3655 LOMITA BLVD			TORRANCE	CA	90505				
	BHAJA	NASIR	U	02/29/1988	100.00	07/09/1975	685							
11401	NASIR U. BHAJA, M.D.				3655 LOMITA BLVD			TORRANCE	CA	90505				
	BHAJA	N.		02/19/1988	100.00	07/09/1975	1026							
10052	NELSON MOTOR PARTS				904 7TH			HARLAN	IA	51537				
	NELSON	WAYNE		01/13/1988	15.00	05/06/1987	130							
5414	NELSON MOTOR PARTS				904 7TH			HARLAN	IA	51537				
	NELSON	WAYNE		10/01/1987	15.00	05/06/1987	1187							
6866	NELSON MOTOR PARTS				904 7TH			HARLAN	IA	51537	1/29/88	$	10.00	11/24/87-1/29/88 66
	NELSON	WAYNE		11/24/1987	10.00	05/06/1987	1378							
8782	NICOLSON - CARR, INC.							CARRINGTON	ND					
	NOLLY	E.	W	12/10/1987	29.00	05/06/1959	1343							
2223	NORMAN F. SPRAGUE, JR., M.D.				3600 WILSHIRE BLVD., SUITE 2110			LOS ANGELES	CA	90010				
	SPRAGUE	NORMAN		07/09/1987	1,000.00	08/10/1970	1526							
10581	NORTH COTE FARM				ROUTE 1, BOX 511			FOREST	VA	24551				
				01/01/1988	1,000.00	08/26/1982	989							
329	NUTMEG CLEANERS				194 MAIN STREET			CHESHIRE	CT	06410				
				04/02/1987	35.00	10/10/1964	367							
11369	ORAL F. ANDREWS, C.L.U.							BOISE	ID	83707				
	ANDREWS	ORAL	F	01/15/1988	25.00	12/10/1982	835							
0	OWEN & ASSOCIATES				11627 WEST 112TH STREET, SUITE 102	1N-BIND		OVERLAND PARK	KS	66210				
					1,000.00	02/14/1984	1597							
8579	P AND D REALTY CO.				28 ROSBURG MALL			BUCCASUNNA	NJ	07814				
	RAMANO			12/07/1987	2,000.00	05/10/1966	261							

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Batch Number	Business Name	Last Name	First Name	M I.	Deposit Date	Address 1	Address 2	City	State	Zip	Contribution Amount	Incorp Date	IID				
10814	PALMER DEVELOPMENT CO.				03/01/1988	2355 IRIS AVE., SUITE A		BOULDER	CO	80302	1,000.00	06/16/1967	992				
9054	PALMERI HARVEY YOUNG & CO.				12/14/1987	111 BROADWAY, SUITE 1300		NEW YORK	NY	10006	1,000.00	12/26/1968	765				
844	PAR REALTY				05/29/1987	452 FRANKLIN AVENUE		GARDEN CITY	NY	11530	25.00	06/25/1981	81				
1576	PARELL AND FRIED					500 BROADWAY		SACRAMENTO	CA	95814	29.00	10/14/1946	397	6/28/88	$ 29.00*	6/22/87-6/28/88	372
11157	PARSONS, HART & CO., AGENT	GERLER	BARON		02/11/1988	SEATTLE TIMES		SEATTLE	WA	98101	34.00	05/31/1925	913				
999844	PECK SLIP ASSOCIATES				03/11/1988			NEW YORK	NY	10010	1,000.00	08/19/1981	647				
4902	PETER M. FREIDMAN LTD.	FREIDMAN	PETER	S	09/21/1987	767 5TH AVENUE, G.M. BUILDING		NEW YORK	NY	10153	1,000.00	03/25/1975	1242	9/26/88	1,000.00	9/21/87-9/26/88	371
7253	PINEY KNOLL FARMS	BODDICKER	PAM		11/05/1987	RR 2, BOX 124		WALKER	IA	52352	25.00	06/01/1978	699				
	PIPELINE ENGINEERING	RAMOS	MARY	A	03/10/1987	24822 2ND STREET		HAYWARD	CA	94541	50.00	01/14/1974	1326				
422	PRESTON R. MERRELL, M.D.	MERRELL	P		05/11/1987	630 W. 13TH AVENUE, STE.A		UPLAND	CA	91786	50.00	06/06/1971	348				
5443	R & A DISCOUNT STORES	CARROTT	ALBERT		10/02/1987	186 FIFTH AVENUE		BROOKLYN	NY	11217	100.00	11/16/1967	1205				
7871	R. O. BORDNER CONSTRUCTION COMPANY	BORDNER	R	O	11/20/1987	3016 N.E. OLADELY		SEATTLE	WA	98105	33.00	11/19/1985	168				
6815	R.L. SWEET LUMBER CO.				10/20/1987			KANSAS CITY	KS	66103	75.00	11/14/1951	56				
8321	RADIOIMMUNOASSAY LABORATORIES FOR ENDOCRINOLOGY & THERA. DRUG	RAO	MICHAEL		11/27/1987	727 SILVER SPUR ROAD, SUITE 207		PALOS VERDES PENINSU	CA	90274	29.00	09/26/1986	1361				
7788	RALEY'S	RALEY	THOMAS	P	11/17/1987	P O. BOX 15618		SACRAMENTO	CA	95852	32.00	01/03/1947	1394				
7969	RAVI MENDA, M.D. - CONCORD - CREST WOOD MEDICAL GROUP	MENDA	RAVI		11/20/1987	4500 SOUTH LINDBERGH BLVD.		ST. LOUIS	MO	63126	250.00	01/31/1974	1413				
8886	RBA GROUP	RBA	WILLIAM		12/14/1987			MORRISTOWN	NJ		2,000.00	10/07/1968	763				

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Batch Number	Business Name / Last Name	First Name	M I	Deposit Date	Address 1 / Contribution Amount	Address 2 / Incorp Date	City	State	Zip			
	DEBOAVAY TRUCK LINE				P.O. BOX 1835							
BAWLSBOUDT	J			12/31/1987	35.00	01/24/1925	338	CLACKAMAS	OR	97015		
6935	BELIANCE TOOL & MFG. CO.			10/30/1987	617 N. STATE ST 50.00	10/14/1968	937	ELGIN	IL	60123		
11494	RICHARD C. BISHOP, M.D.				301 N. BASTANCHURY RD.							
PELEG	LAURA	E		02/22/1988	100.00	12/22/1976	845	FULLERTON	CA	92635		
1901	RICHARD P. BEIN, D.D.S.				356 NEW BROTHERHOOD BLDG.							
BEIN	RICHARD	P		06/10/1987	500.00	06/17/1972	1515	KANSAS CITY	KS	66101		
11334	RICHARD T. BADA, M.D.				10002 COLLEGE PL							
BADA	RICHARD	T		02/16/1988	50.00	03/25/1982	822	CERRITOS	CA	90701		
12825	BICKETTS TRUCKING COMPANY				1001 W. MAGNOLIA							
BOSTON	LORETTA			03/31/1988	200.00	12/01/1983	575	PHOENIX	AZ	85007	7/29/88	$200.00* 3/31/88-7/29/88 120
999939	ROBERT M. [illegible], D.C. P.A.				613 HARKET, SUITE 501							
BARRON	[illegible]ST		C	03/25/1988	100.00	08/06/1980	1466	OSAGE CITY	KS	66523		
12169	ROBERT L. HAMARD, III. ATTORNEY AT LAW				221 CARONDELET ST., SUITE 600							
				02/12/1988	1,000.00	02/16/1983	1011	NEW ORLEANS	LA	70130		
5001	ROBINS ASSOCIATES, P.A.				12676 BUCKLAND STREET							
				10/05/1987	25.00	01/20/1982	1271	WEST PALM BEACH	FL	33414		
7725	RONALD BOOK, P.A. - OPERATING ACCOUNT				20801 BISCAYNE BOULEVARD, SUITE 401							
BOOK	RONALD			11/17/1987	1,000.00	01/20/1987	218	NORTH MIAMI BEACH	FL	33180		
11803	ROSE BRIGLEVICH, M.D., P.C.				4802 RIDGE RD.							
BRIGLEVICH	R.			02/09/1988	100.00	07/25/1977	686	SMYRNA	GA	30080	7/28/88	$100.00* 2/9/88-7/28/88
11863	ROSEN, INGBERMAN AND ROSEN				900 SYLVAN AVENUE							
ROSEN	JOSEPH			03/29/1988	1,000.00	10/16/1984	674	ENGLEWOOD CLIFFS	NJ	07632		
12087	RUBLE CONSTRUCTION CO.				3063 BEECH RUB							
RUBLE	CECIL	D		01/01/1988	25.00	04/14/1977	1111	MEMPHIS	TN	38128		
5261	RUBLE CONSTRUCTION CO.				3063 BEECH RUB							
RUBLE	CECIL	D		09/29/1987	50.00	04/14/1977	2166	MEMPHIS	TN	38126		
8157	R & J LAND & CATTLE CO.											
RAPE	WILLIE	J		11/23/1987	25.00	12/08/1980	163	ROBINSON	KS	66532		
9510	R. ALBARBROUH, M.D. & ASSOCIATES, P.C.				210 W. 22ND STREET SUITE 133							
ALBARBROUH	GERALDINE			10/02/1987	50.00	01/29/1978	51	OAK BROOK	IL	60521		
7302	RACKS REALTY CO.				10 HURON AVE							
RACKS	ROBERT			11/05/1987	1,000.00	05/13/1974	70	JERSEY CITY	NJ	07304		

Listing of Possible Corporate Contributors by corporate name--Date Run Date: 06/07/1990 Page: 11

Batch Number	Business Name	Address 1	Address 2	City	State	Zip
Last Name	First Name	M/F	Deposit Date	Contribution Amount	Incorp Date	IID
3264	SCHWINDLER BROKERAGE COMPANY-WICHITA	939 NORTH MAIN		WICHITA	KS	67201
WRIGHT	GARY	L	08/06/1987	250.00	12/18/1978	1567
7866	SERVICES UNLIMITED	3845 BUTTON ROAD		TOPEKA	KS	66610
OSTRANDER	DON	G	11/01/1987	50.00	01/14/1983	632
7610	SHERMAN'S MOBILE AIR CONDITIONING	3636 THIRD STREET		RIVERSIDE	CA	92501
SHERMAN	DONALD	P	11/09/1987	25.00	01/22/1985	1388
3636	SILVI CONCRETE PRODUCTS, CERTIFIED READYMIX CONCRETE, ETC.	1901 BRISTOL PIKE		MORRISVILLE	PA	
SILVI	JOHN	J	08/14/1987	1,000.00	12/20/1962	1540
1866	SMITH AND THOMAS	11 GOLDEN SHORE DR., SUITE 420		LONG BEACH	CA	90802
		06/08/1987		100.00	07/02/1974	376
13894	SMITH AND THOMAS	11 GOLDEN SHORE DR., SUITE 420		LONG BEACH	CA	90802
		04/29/1988		30.00	07/02/1974	1443
7987	SPRINGFIELD FARM	ROUTE 1, BOX 230 D		LINVILLE	VA	22834
STOOL	CHERRILL	E	11/19/1987	32.00	06/15/1977	1408
9140	STEPHEN E. GENENDER, M.D.	8435 W. 3RD ST., STE 1000, W. TOWER		LOS ANGELES	CA	90048
GENENDER	S	E	12/10/1987	1,000.00	10/17/1980	143
10789	SUBURBAN ELECTRIC	P.O. DRAWER 181		CRESTLINE	CA	92325
GLADDEY	JOY		01/30/1988	50.00	01/02/1981	967
7844	SUNRISE OILFIELD SUPPLY COMPANY	104 S. BROADWAY, SUITE 1600		WICHITA	KS	67202
		11/01/1987		50.00	12/30/1979	666
6156	SUSAN E. LOGGANS & ASSOCIATES	615 N. WABASH AVE.		CHICAGO	IL	60611
		10/30/1987		100.00	12/31/1984	861
10065	SYSTEMS 3	3715 SW 29TH STREET		TOPEKA	KS	66614
HORROLLOW	JOANN		01/11/1988	15.00	03/20/1978	354
199057	SYSTEMS 3	3715 SW 29TH STREET		TOPEKA	KS	66614
HORROLLOW	JOANN		03/14/1988	15.00	03/20/1978	1588
6484	TENNESSEE VALLEY SALES COMPANY	SUITE 605, TALLAH BUILDING		CHATTANOOGA	TN	37402
JONES III	ROBERT	C	10/22/1987	100.00	12/27/1982	1420
12506	THREE MAPLE FARMS	ROUTE 3		VIROQUA	WI	54665
SOLVERSON	ALAN	D	01/18/1988	30.00	05/20/1976	27
6383	TOM HELMS ASSOCIATES	99 ELAINE LAKE		BURTSVILLE	TX	77340
HELMS	TOM		10/16/1987	50.00	01/10/1983	1317

Listing of Possible Corporate Contributors by corporate name--Dole Run Date: 06/07/1990 Page: 12

Batch Number	Business Name	Last Name	First Name	M I	Deposit Date	Address 1	Contribution Amount	Incorp Date	SIC	Address 2	City	State	Zip				
11660	TOMAHAWK CONSTRUCTION CO.	JABOVEC	DELMAR	A	03/24/1988	P.O. BOX 3510	250.00	01/21/1981	650		KANSAS CITY	KS	66103	6/28/88	$250.00*	2/24/88-6/28/88	
10686	TOMAHAWK CONSTRUCTION CO.				01/26/1988	P.O. BOX 3510	32.00	01/21/1981	651		KANSAS CITY	KS	66103				
6116	TOMAHAWK CONSTRUCTION CO.	JACQUES	MADELEN		10/15/1987	P.O. BOX 3510	150.00	01/21/1981	1268		KANSAS CITY	KS	66105				
10669	TONY DEPAUL & SON	DEPAUL	PETER		01/28/1988	6TH & OLNEY AVE	1,000.00	04/15/1980	570		PHILADELPHIA	PA	19120				
11883	TRI FARMS	GUNES	OMF		03/29/1988	P.O. BOX 7	1,000.00	03/21/1975	28		FIREBAUGH	CA	93622				
13304	UNITED PETRO LTD.	RUESING	WILLIAM	A	05/12/1988	5110 N CENTRAL AVE., SUITE 220	25.00	10/01/1976	613		PHOENIX	AZ	85012				
3689	UNITED SUPPLY CO.	CRITTENDEN	MARK	R	07/23/1987	2354 LINCOLN BLVD., STE. NO. 316	150.00	09/27/1962	1531		MARINA DEL REY	CA	90291				
8523	VAUGHN ORGANIZATION	VAUGHN	D	E	12/04/1987	42 WEST LAFAYETTE STREET	1,000.00	12/27/1961	142		TRENTON	NJ	08608				
8004	VEITAS & VEITAS ENGINEERS	VEITAS	BARBARADOGLAS		12/14/1987	29 FORHILL LANE	1,000.00	12/26/1986	364		MILTON	MA	02186				
11803	VICTOR J. DIAMOND, D.D.S., INC.	GOLDFINGER	MARSHA		03/29/1988	9201 SUNSET BLVD., SUITE 815	10.00	04/01/1977	673		LOS ANGELES	CA	90069	6/28/88	$10.00*	2/29/88-6/28/88	120
2438	VP ENTERPRISES				01/14/1987	HIGHWAY 36	150.00	01/11/1979	1520		SMITH CENTER	KS	66967				
9160	WALD ORGANIZATION, THE	LIVINGSTON	DONALD		12/10/1987	P.O. BOX 69170	500.00	09/30/1980	143		LOS ANGELES	CA	90069				
11705	WALSH & KINCAID COMPANY	STERN	SUSANNE		03/24/1988	300 RENAISSANCE CENTER, SUITE 3030	100.00	07/29/1948	109		DETROIT	MI	48243				
4900	WALTER D. [illegible] P.A., ATTORNEY AT LAW	BLAKE	WALT H	B	03/21/1987	1601 UNIVERSITY DR., SUITE 202	0.50	03/13/1979	1241		CORAL SPRINGS	FL	33065				
3617	WARBONE CL[illegible]	WARBONE	MARINE	L	11/13/1987	3411 MAIN	25.00	03/26/1971	230		PARSONS	KS	67357				
13450	WARRINGTON HOMES	HOGESLE	WILLIAM	S	03/14/1988	1050 FULLMAN ST	250.00	12/06/1976	521		COSTA MESA	CA	92626				
9633	WEATHERLY INSULATION COMPANY	WEATHERLY	WILLIAM	A	12/30/1987	P.O. BOX 956	12.00	12/31/1956	750		SUMTER	SC	29150				

Listing of Possible Corporate Contributors by corporate name--Date Run Date: 06/03/1998 Page: 13

Batch Number	Business Name			Address 1	Address 2	City	State	Zip
Last Name	First Name	M I	Deposit Date	Contribution Amount	Incorp Date	IRD			
5970 WELLS PROPERTIES				P.O. BOX 3516		SOUTHSAN FRANCISCO	CA	94081
WELLS	DONALD	A	10/11/1967	50.00	05/28/1981	1376		
1515 WEST LAND SURVEYORS				7918 HANOVER AVE.		DALLAS	TX	
			06/19/1967	50.00	05/18/1967	392		
7781 WHITE FUEL COMPANY				12 HYLESTEAD STREET		PROVIDENCE	RI	02905
			11/17/1967	15.00	01/16/1919	203		
7760 WICHITA OB-GYN ASSOC.....S, P.A.				550 NORTH LORRAINE		WICHITA	KS	67214
SANTOS	SHEARE		11/17/1967	50.00	01/04/1900	111		
9631 WILLIAM S ...CH, M.D.				5354 REYNOLD STREET, SUITE 601		SAVANNAH	GA	31406
WOODS	...ULINE		10/02/1967	40.00	08/15/1985	1269		
7181 WILLIAM S. BITCH, M.D.				5354 REYNOLD STREET, SUITE 601		SAVANNAH	GA	31405
WOODS	PAULINE		11/03/1967	500.00	08/15/1985	1291		
6696 WILLIAM W. BRADLEY, D.D.S.				5480 BALBOA BOULEVARD, SUITE 321		ENCINO	CA	91316
UNKNOWN			10/27/1967	20.00	04/27/1979	1427		
8370 WILSHIRE CENTER CAMERAS				3101 WEST 6TH STREET		LOS ANGELES	CA	90020
BIGELOW	D	P	11/30/1967	5.00	08/25/1972	264		
Total For Report				68,961.38				

Total Records: 313

ALTMAN BROTHERS
115 NEW STREET
GLENSIDE, PA. 19038
(215) 884-8490
JULY 17, 1992

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
92 JUL 17 PM 4:56

FEDERAL ELECTION COMMISSION
OFFICE OF THE GENERAL COUNSEL
999 E. STREET N.W.
WASHINGTON, D.C. 20463

ATTENTION: MR. JEFFREY LONG

RE: PHONE CONVERSATION - ALTMAN BROTHERS CONTRIBUTION OF $3,000.00 TO DOLE FOR PRESIDENT COMMITTEE (MUR 3309)

DEAR SIR:

PER YOUR PHONE REQUEST, I AM FAXING THIS LETTER TO YOU.

AS I EXPLAINED TO YOU IN OUR CONVERSATION, WE BELEIVE THAT A FORMER EMPLOYEE, MRS. DONNA MURRAY HAD CONTACTED YOUR OFFICE IN REGARDS TO THE SUBJECT MATTER.

ALTMAN BROTHERS IS A PARTNERSHIP WITH THREE BROTHERS AS PARTNERS, MR. BEREL ALTMAN, MR. DAVID ALTMAN, AND MR. IRVING ALTMAN.

THE CHECK FROM ALTMAN BROTHERS WAS INTENDED AS AN INDIVIDUAL CONTRIBUTION OF $1,000.00 FROM EACH OF THE PARTNERS.

SHOULD YOU NEED ANY OTHER INFORMATION, PLEASE FEEL FREE TO CONTACT ME.

VERY TRULY YOURS,

Joseph F. Lewandowski

JOSEPH F. LEWANDOWSKI,
ACCOUNTANT

93040095256O

JUL-17-'92 15:05 ID:ALTMAN COMPANIES TEL NO:215-884-7372 #005 P02

ALTMAN BROTHERS
115 NEW STREET
GLENSIDE, PA. 19038
(215) 884-8490
JULY 20, 1992

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

92 JUL 20 PM 4:55

FEDERAL ELECTION COMMISSION
OFFICE OF THE GENERAL COUNSEL
999 E. STREET N.W.
WASHINGTON, D.C. 20463

ATTENTION: MR. JEFFREY LONG

RE: PHONE CONVERSATION OF THIS AFTERNOON - ALTMAN BROTHERS CONTRIBUTION OF $3,000 TO DOLE FOR PRESIDENT COMMITTEE (MUR 3309)

DEAR SIR:

PER YOUR PHONE REQUEST, I AM FAXING THIS LETTER TO YOU.

ATTACHED IS A COPY OF ALTMAN BROTHERS CHECK NO. 4286 OF DECEMBER 2, 1987 TO "DOLE FOR PRESIDENT".

AS I EXPLAINED TO YOU IN OUR CONVERSATION, THE ACCOUNT THAT THIS CHECK WAS WRITTEN OUT OF IS A PARTNERSHIP ACCOUNT. THE COMPORATE CHECKING ACCOUNT THAT YOU REFERRED TO IS ALTMAN BROS., INC. ACCT. NO. 0105-8845. THE CORPORATE CHECKING ACCOUNT IS FOR A SEPARATE ENTITY WITH A SEPARATE FEDERAL IDENTIFICATION NUMBER.

I WILL BE GIVING COPIES OF ALL CORRESPONDENCE REGARDING THIS MATTER TO MR. BEREL ALTMAN. PLEASE CONTACT HIM AS TO THE FINAL RESOLUTION OF THIS MATTER.

VERY TRULY YOURS,

Joseph F. Lewandowski

JOSEPH F. LEWANDOWSKI,
ACCOUNTANT

7350407325 61

JUL-20-'92 14:53 ID:ALTMAN COMPANIES TEL NO:215-884-7372 #414 P02

7350400752562

ALTMAN BROTHERS
115 NEW STREET
GLENSIDE, PA. 19038

4286

VERIFIED

7 Dec 1987

PAY TO THE ORDER OF Dole for President 09-31-87 6520024719 403453004 $ 3000 00/100

Three-Thousand 00/Dollars

Philadelphia National Bank

FOR PLIRMA

⑈004286⑈ ⑆031000019⑆ 0131144170⑈ ⑈0000300000⑈

JUL-20-'92 14:53 ID:ALTMAN COMPANIES TEL NO:215-884-7372 #414 P03

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	**SENSITIVE**
Dole for President Committee and James L. Hagen, as treasurer	)	
Campaign America and Judith F. Taggart, as treasurer	)	MUR 3309
9 Corporations	)	
6 Political Committees	)	
23 Individuals	)	

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On October 29, 1991, the Commission found reason to believe the Dole for President Committee and James L. Hagen, as treasurer, ("Dole Committee") violated 2 U.S.C. §§ 434, 441a(b)(1)(A), 441a(f), and 441b, and 26 U.S.C. § 9035(a); that Campaign America and Judith F. Taggart, as treasurer, ("Campaign America") violated 2 U.S.C. § 441a(a)(2)(A); that nine corporations violated 2 U.S.C. § 441b; that four political committees violated 2 U.S.C. § 441a(a)(2)(A); that two political committees violated 2 U.S.C. § 441a(a)(1)(A); and that 23 individuals violated 2 U.S.C. § 441a(a)(1)(A). On November 6, 1991, the Commission made a correction in the finding with respect to the General Electric Company Political Action Committee. On November 29, 1991, the Commission made a correction in the finding with respect to a putative individual (Rebma Obermayer), which was in fact Obermayer, Rebmann, Maxwell & Hippel.

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This report addresses the responses received from all respondents except the Dole Committee and makes recommendations regarding preprobable cause conciliation or taking no further action with respect to them. The Dole Committee will be addressed in a separate report.

II. ANALYSIS AND DISCUSSION OF CONCILIATION PROVISIONS AND CIVIL PENALTY

A. Campaign America

The Commission found reason to believe that Campaign America violated 2 U.S.C. § 441a(a)(2)(A) by making excessive in-kind contributions to the Dole for President Committee in Iowa and New Hampshire in 1986 and 1987 in the form of testing-the-waters expenditures totaling $38,406.61. This figure represented those Campaign America expenditures which the Commission had determined were allocable to the Dole campaign's expenditure limitations in Iowa and New Hampshire. As a multicandidate committee, Campaign America could only have expended as much as $5,000 on behalf of the Dole campaign.

On December 9, 1991, counsel for Campaign America requested pre-probable cause conciliation. (Attachment 1, pages 232-248).

The $38,406.61 figure included $33,889.32 in Campaign America expenditures in Iowa. This latter number consisted in part of $14,684.35 spent in connection with three town meetings and a breakfast meeting in February, 1987, at which Senator Dole appeared. It also included $10,214.70 in staff expenses associated with these same events. The four events were held shortly before Senator Dole began his campaign for the presidency.

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The $33,889.32 in Iowa-related expenditures also included $8,010.67 and $979.60 as partial payments for a Campaign America telemarketing program designed in part to create a list of Dole supporters. The survey data was apparently used with respect to Campaign America events in Iowa. The Dole Committee used the same vendor.

More recently, it has come to the attention of this Office that there were additional Campaign America expenditures identified by the Audit Division totaling $6,522.50 which were made in connection with the four Iowa events cited above, but which were not included in the sum upon which the Commission's reason to believe determination was based.[1] Campaign America also incurred a further $1,476 in expenditures to International Tours for interstate transportation related to the four events involving Tom Synhorst, a Campaign America staff member at the time and later Dole for President Committee regional director for Iowa and Kansas. None of these particular payments was allocable to the Dole campaign's spending limitation in Iowa because they involved interstate transportation (See former 11 C.F.R. § 106.2(c)(4)(1989)), but they did constitute testing-the-waters expenditures on behalf of the Dole campaign by virtue of their connection with the town meetings and breakfast.

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1. This $6,522.50 included $1,938 paid to Long Line Communications, $983.50 paid to Growth Industries, $598 paid to International Tours of Alexandria, $1,383 paid to REFCO Incorporated, and $1,620 paid to KVI Aviation.

The addition of the interstate transportation expenditures discussed above to the earlier figure of $33,889.32 brings to $41,877.82 Campaign America's expenditures in Iowa on behalf of the Dole campaign.

With regard to New Hampshire, Campaign America made 117 payments totaling $3,136.26 for voter lists and $2,223.16 for a business telephone with a number later used by the Dole Committee. Only $1,381.03 of the latter amount was allocable to New Hampshire, and it was this figure which was included in the $38,406.61 which formed the basis for the Commission's reason to believe determination. In reality the entire $2,223.16 represented testing-the-waters expenditures on behalf of the Dole campaign. Thus, total in-kind contributions by Campaign America to Dole for President which arose from activities in New Hampshire came to $5,359.42.

In summary, testing-the-waters expenditures made by Campaign America on behalf of the Dole for President Committee totaled $47,247.24, including $41,887.82 in Iowa and $5,359.42 in New Hampshire.

This Office recommends that the Commission agree to enter into conciliation with Campaign America and Judith Taggart, as treasurer, prior to a finding of probable cause to believe.

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B. Corporations

Corporate Contributions and Corporate Aircraft

On October 29, 1991, the Commission found reason to believe that the following corporations violated 2 U.S.C. § 441b[2]:

1. Bertram Associates;
2. Becon Construction Company, Inc.;
3. Browning-Ferris Industries;
4. Contran;
5. H & W Aviation;
6. Long Lines Limited;
7. Owen and Associates;
8. P and D Realty Company;
9. RBA Group.

Corporate Responses

1. H & W Aviation

On December 27, 1991, the Office of the General Counsel received a letter from Ms. Geraldine Ann Price, responding in behalf of H & W Aviation ("H & W"). (Attachment 1, page 156). In this response, Ms. Price states that H & W was never a corporation itself, but was in fact a joint venture formed by two corporate owners of an aircraft in 1983 and disbanded in 1990 when the aircraft was sold.[3] Ms. Price indicated that this aircraft was not used full time by the owners; therefore, they chartered out the

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2. See General Counsel Report dated August 27, 1991.

3. The two owners of H & W Aviation were Wilson & Wilson, Inc. and Hadson Aviation, Inc. The effect is the same as if the entity were incorporated.

aircraft to "reduce the overhead costs shared by the partners." She states further:

> It was agreed that the pilots would pick up some members of the Dole Campaign staff in Washington D.C., deliver them to various cites in the Midwest and return them to Washington D.C. They had been quoted an hourly rate for the use of the aircraft, which was consistent with other charter flights. After the trip, we received a letter from a member of the Dole Campaign staff asking us to reduce the charges to $7,000, which they felt was equal to first class fares for the trips and people involved. I would have no way of knowing how accurate this figure might be. The $7,000 was less than the actual out of pocket costs for this trip, and the intent of the partners was to cover these costs plus have excess revenue to cover overhead expenses of the time added to the aircraft's engines.

Ms. Price also states in this response that the charter occurred on March 4, and 5, in 1988, and that the Dole Committee did not pay the bill until June of that year. Ms. Price further states that "[i]n an effort to collect as much as possible, it was agreed to reduce the charges slightly from the original quote. This bill might have otherwise been uncollectable." Ms. Price's statement appears to indicate that the initial amount billed to the Dole Committee was more than the ultimate amount paid. This appears inconsistent with Mr. Palken's statement that the initial amount charged was the same as the amount paid, but was less than the "standard fare of $14,750.00."

On February 25, 1992, the Office of the General Counsel received a second response from Ms. Price, responding in behalf of H & W. (Attachment 1, page 157). Ms. Price basically summarized what was stated in her first response. She states further that "[t]he amount received paid all out-of-pocket costs as well as

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generating a substantial profit." A copy of the Dole Committee trip charges was enclosed along with this response. (Attachment 1, page 158). This copy of the trip charges indicated that H & W's actual cost of the trips totaled $7,075.67, thus the $12,000.00 payment from the Dole Committee left a total of $4,924.33 in excess of the actual costs of the charter.

In an April 7, 1988, memoranda to Ben Cotton of the Dole Committee, Stephen Palken states that Ms. Price told him "that the billing represented a discount from the standard fare of $14,750.00." (Attachment 1, page 162). It appears the amount that the Dole Committee actually paid for the charter was $2,750.00 lower than the amount which would have been the standard charge for the Dole Charter. Even though Ms. Price asserts that the reduction of the amount originally billed to the Dole Committee was an effort to collect as much as possible, the evidence on hand shows that the Dole Committee received a $2,750.00 discount from the standard fare, which would still constitute a prohibited corporate in-kind contribution in violation of the Act. Furthermore, the fact that H & W received a total of $4,924.33 in excess of the actual costs of the charter is not really relevant, especially since if H & W had received the standard fare from the Dole Committee, H & W would have received a total of $7,674.33 in excess of the actual costs of the charter.

This Office recommends that the Commission enter into conciliation with H & W Aviation prior to a finding of probable cause to believe.

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2. Owen & Associates

On December 2, 1991, the Office of the General Counsel received a letter from David C. Owen, responding in behalf of Owen & Associates, Inc., requesting to enter into pre-probable cause conciliation. (Attachment 1, page 163). Mr. Owen states that he was unaware that the use of his company's plane by the Dole Committee violated any laws and that upon being told of such, he informed the Dole Committee of his usage and documented the hours. Mr. Owen states further "[i]t was my impression that the payment I received from the Committee for more than $9,000.00 was sufficient to clear up any unintended violations." Based upon the response received from Mr. Owen, he does not present any evidence which would dispute the Commission's reason to believe findings that Owen and Associates violated 2 U.S.C. § 441b(a) by reducing the Committee's charge by $1,000.00 for use of its aircraft, and by failing to require advance payments before providing travel on the company's aircraft as required by 11 C.F.R. § 114.9(e).

This Office recommends that the Commission enter into conciliation with Owen & Associates prior to a finding of probable cause to believe.

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3. P and D Realty Co.

On December 17, 1991, the Office of the General Counsel received a letter from Mr. David P. Romano, responding in behalf of P and D Realty Co. (Attachment 1, page 164). Mr. Romano states in this response that P and D Realty is a partnership and not a corporation. A copy of P and D Realty's Partnership Agreement and copies of its partnership returns for the past three years were enclosed with this response. (Attachment 1, pages 165-183).

Staff from this Office contacted the Office of the New Jersey Secretary of State, Corporation Division, and confirmed that P and D Realty Co. was a partnership and not a corporation. Therefore, it appears that the $2,000.00 contribution from P and D Realty Co. to the Dole Committee was not a corporate contribution; however, it does appear that this contribution may be considered an excessive contribution in violation of 2 U.S.C. § 441a(a)(1)(A). Pursuant to 11 C.F.R. § 110.1(e), a contribution by an unincorporated partnership is attributed to both the partnership and the partners in direct proportion to his or her share of the partnership profits or by agreement of the partners as long as only the profits of the partners to whom the contribution is attributed are reduced (or loses increased) in proportion to the contribution attributed to each of them. A contribution by a partnership shall not exceed the limitation on contributions by individuals, or in the case of a candidate for nomination for President $1,000.00. Therefore, it

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appears that P and D Realty Co. exceeded the contribution limitation by $1,000.00.

Therefore, the Office of the General Counsel recommends that the Commission take no further action in this matter as to P and D Realty Co.'s 2 U.S.C. § 441b violation and close the file with respect to it. Furthermore, the letter in this matter will have an admonishment as to the excessive contribution.

4. Bertram Associates

On December 27, 1991, the Office of the General Counsel received a request from counsel representing Bertram Associates for a copy of the Respondent's $2,000.00 contribution check to the Dole Committee, which was sent to Bertram Associates' counsel. (Attachment 1, page 184). On March 30, 1992, via telephone, this Office received a response from Bertram Associates' counsel, who stated that Bertram Associates was actually a partnership consisting of six partners and not a corporation. Counsel for Bertram Associates also stated that none of the six partners were a corporation. As noted above, a contribution by a partnership shall not exceed the limitation on contributions by individuals, or in the case of a candidate for nomination for President $1,000.00.

On April 18, 1992, this office received a letter from Bertram's counsel, enclosing a copy of a letter from Bertram's bank, The National State Bank, from which the $2,000.00 contribution check was drawn on, stating that the account was a partnership account. (Attachment 1, pages 185-186). This evidence

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appears to substantiate Bertram's assertion that Bertram is not a corporation; however, it does appear that this contribution may be considered an excessive contribution in violation of 2 U.S.C. § 441a(a)(1)(A).

Therefore, the Office of the General Counsel recommends that the Commission take no further action in this matter as to Bertram's 2 U.S.C. § 441b violation and close the file with respect to it. Furthermore, the letter in this matter will have an admonishment as to the excessive contribution.

5. RBA Group

On December 11, 1991, the Office of the General Counsel received a letter from counsel representing the RBA Group ("RBA"), requesting a copy of RBA's $2,000.00 contribution check to the Dole Committee in order to respond further to the Commission's finding. (Attachment 1, pages 187-189). In addition, counsel also requested to enter into pre-probable cause conciliation. On January 8, 1992, a copy of the requested document was sent to counsel for RBA.

On March 31, 1992, this office received RBA's response to the Commission's finding. In this response, counsel for RBA asserts that no action should be taken against RBA. An affidavit from William Garro, President, was enclosed along with this response. (Attachment 1, pages 190-191). Mr. Garro states in this affidavit that the $2,000.00 check from RBA was actually for the purchase of two tickets "to attend a reception honoring Senator Robert Dole and Elizabeth Hanford Dole (on December 8, 1987)...," and that he was

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unaware at the time "of any impropriety associated with the purchase of the two tickets." Mr. Garro states further that the Dole Committee advised RBA that it was improper for the corporation to purchase tickets to the reception and that the Dole Committee may have returned their check. Mr. Garro also asserts that it was his understanding that principals of the RBA reimbursed RBA and/or the Dole Committee and that this reimbursement "corrected any appearance of actual impropriety."

Even though Mr. Garro has asserted that corrective measures were taken to rectify "any impropriety associated with the purchase of the two tickets," Mr. Garro has failed to present any solid or documentary evidence supporting his assertions. It is Mr. Garro's recollection that the Dole Committee may have returned the check and that the principals of RBA reimbursed the corporation and/or the Dole Committee. It does not appear that Mr. Garro knows for sure if the check was returned to the Dole Committee and whether or not the principals reimbursed the corporation and/or the Dole Committee.

Based upon the above-mentioned information, it still appears that RBA violated the Act by contributing $2,000.00 to the Dole Committee by purchasing two tickets to the Dole reception in violation of 2 U.S.C. § 441b(a). Therefore, this Office recommends that the Commission enter into conciliation with the RBA Group prior to a finding of probable cause to believe.

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6. Becon Construction Company

On December 16, 1991, the Office of the General Counsel received a letter from Grayson M. Hippard, in behalf of Becon Construction Company ("Becon"). (Attachment 1, page 192). Mr. Hippard states in this letter that a response would be forthcoming after a review of the situation. On December 30, 1991, this Office received a letter from counsel representing Becon, requesting an extension to respond to the Commission's finding and copies of the documents which indicated that Becon had made a $2,475.00 in-kind contribution to the Dole Committee as well as providing air travel without advance payment, which were sent to him on January 8, 1992.

On January 14, 1992, this Office received another request for an extension from Becon's counsel in order to respond to the Commission's findings. On January 30, 1992, this Office received a third request from Becon's counsel for an extension in order to secure additional material and documentation to respond to the Commission's findings. Finally, on February 25, 1992, this Office received a letter from Becon's counsel requesting to enter into pre-probable cause conciliation. (Attachment 1, page 193). Becon's counsel has not provided any evidence which would indicate that Becon did not violate 2 U.S.C. § 441b(a) by making a $2,475.00 in-kind contribution as well as providing air travel without advance payment.

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This Office recommends that the Commission enter into conciliation with Becon Construction Company prior to a finding of probable cause to believe.

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7. Browning-Ferris Industries

On December 23, 1992, the Office of the General Counsel received a response from counsel representing Browning-Ferris Industries ("BFI"), requesting that the Commission dismiss this matter as it pertains to BFI.[4] (Attachment 1, pages 196-198). BFI's counsel asserts that the record before the Commission "clearly indicates that BFI made every effort to obtain advance payment in each instance in which its plane was made available to the Dole campaign." It is BFI counsel's assertion that the five late payments "resulted because of the care taken both by BFI and the Dole Committee to insure that correct advance payments were made pursuant to the FEC regulations." Counsel for BFI states that

4. It was noted in the First General Counsel Report that the Dole Committee made 5 payments, totaling $7,657.00 ($630.00, $1,254.00, $1,280, $2,709.00 and $2,414.00) to BFI which were not made in advance as required by 11 C.F.R. § 114.9(e).

in two of five instances the payments ($2,709.00 and $1,280.00 payments) were actually replacement checks for payments made prior to air travel. It appears from the documents that BFI's counsel provided as evidence that these two payments were in fact replacement checks to correct the totals due to reflect the change of actual passengers traveling. (Attachment 1, pages 199-202).

Counsel for BFI asserts further that the payment of $630.00 in question "was not campaign related and thus is not covered by 11 C.F.R. § 114.9(e)." A July 9, 1987, letter which BFI's counsel has submitted as evidence appears to indicate that the payment was made pursuant to Senate rules to reimburse BFI for non-campaign air travel provided for Senator Grassley. (Attachment 1, pages 203-221). Therefore, it does not appear that this payment would be required to be paid in advance as required by 11 C.F.R. § 114.9(e).

BFI counsel's explanation of the $2,414.00 payment appears to be irrelevant to the fact that the payment was not paid in advance as required. Counsel for BFI has asserted the following: On November 20, 1987, the Dole Committee provided a check for $3,364.00 to BFI which reimbursed the company for $2,414.00 in expenses for air travel during the dates mentioned above [November 17 - 18], plus $950 dollars for a trip scheduled on November 22, 1987. Again, the records reflect that this was a corrected check replacing one previously issued.

Even though BFI's counsel has indicated that a check in the amount of $3,364.00 was issued to correct the $2,414.00 check, the facts still remain that the first payment was issued on November 20, 1987 for $2,414.00 for travel which occurred on

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November 17, 1987 and November 18, 1987. The fact that this check was replaced on the same day does not change the fact that the payment was not paid in advance as required by 11 C.F.R. § 114.9(e).

BFI's counsel does not dispute the fact that the March 15, 1988 payment of $1,254.00 was not paid in advance. BFI's counsel states that the Dole Committee made the reimbursement "as soon as it was discovered that the payment had inadvertently not been made."

Based upon the above-mentioned information, it still appears that the $2,414.00 and $1,254.00 ($3,668.00 combined total) were not paid in advance as required by 11 C.F.R. § 114.9(e). Therefore, the Office of the General Counsel recommends that the Commission reject BFI's request to dismiss this matter. Instead, this Office recommends that the Commission offer to enter into conciliation with Browning-Ferris Industries prior to a finding of probable cause to believe.

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8. Contran

On December 6, 1991, the Office of the General Counsel received a letter from counsel representing Contran, requesting

copies of the documents which indicated that on three occasions Contran had provided air travel to the Dole Committee without advance payment. (Attachment 1, pages 222-223). On December 10, 1991, copies of the requested documents were sent to counsel for Contran. On January 6, 1992, this Office received a letter from Contran's counsel requesting to enter into pre-probable cause conciliation. (Attachment 1, page 224). Counsel for Contran has not presented any evidence which would indicate that Contran had not violated 2 U.S.C. § 441b(a).

This Office further recommends that the Commission enter into conciliation with Contran prior to a finding of probable cause to believe.

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9. Long Lines Limited

On January 3, 1992, the Office of the General Counsel received a response from counsel representing Long Lines Limited ("LLL"), requesting to enter into pre-probable cause conciliation. (Attachment 1, pages 225-226). Counsel for LLL states the following in this letter: First, the respondent has no prior history of any FEC violations. Second, as a practical matter, the respondent relied upon the Dole campaign to assure that federal

election procedures were being followed. Indeed, the letter from the Dole campaign counsel represented that the charter payment in question was being made "according to" FEC regulations. Although the respondent fully recognizes its responsibility for ensuring its own compliance with FEC regulations, the practical circumstances here led the respondent to err inadvertently in this single instance. Third, the respondent will take appropriate measures to ensure that FEC violations do not occur in the future. Fourth, although the regulation was violated, the violation was minor. The sum in controversy was relatively small and payment was sent by the Dole campaign within a week of the time that the flights occurred. Indeed, had the Dole campaign used another method of transport, the payment would clearly have been made within a "commercially reasonable time." See 11 C.F.R. § 114.9(e)(2).

Since counsel for LLL does not dispute the Commission's finding, it appears that LLL violated 2 U.S.C. § 441b(a) by not requesting payment of $3,880.00 before providing travel to the Dole Committee.

This Office recommends that the Commission enter into conciliation with Long Lines Limited prior to a finding of probable cause to believe.

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C. Political Action Committees ("PAC")

On October 29, 1991, the Commission found reason to believe that six (6) political committees ("PACs") violated 2 U.S.C. §§ 441a(a)(1)(A) or 441a(a)(2)(A) (depending on the committees' multicandidate status) for making excessive contributions to the Dole Committee. Written responses were received from all six PACs. On the basis of those responses, this Office recommends that the Commission take no further action against Ernst & Young Los Angeles PAC and Harry D. Slaughter, as treasurer, General Electric Company PAC and Robert W. Nelson, as treasurer, and Fluor Corporation Public Affairs Committee and Andrew M. Schwartz, as treasurer,[5] and close the file as to these respondents. This Office also recommends that the Commission enter into pre-probable cause conciliation with the U.S. Federation of Small Businesses and Carla L. Saunders, as treasurer; Tele-Communications, Inc. PAC and Gary K. Bracken, as treasurer; and Hartford Insurance Group PAC and Robert J. Mageau, as treasurer.

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5. Fluor PAC amended its statement of organization on February 5, 1992, to announce Andrew Schwartz as successor to George Hessler as treasurer of the committee.

1. Ernst and Young Los Angeles-PAC

The Commission found reason to believe that Ernst and Young Los Angeles-PAC (EYLA) made an aggregate total of $7,500 in contributions to the Dole Committee. A response was received on behalf of EYLA on January 31, 1992. The response first states that although no record of any contributions were found indicating that EYLA made contributions to the Dole Committee in 1987 and 1988, a separate political committee sponsored by other partners of Arthur Young & Company did make contributions to the Dole Committee in 1987. The response asks that the Commission take no further action first, because EYLA was improperly named as a respondent and second, because the political committee that did make the contributions, Federal Arthur Young & Company PAC ("FAYPAC"), was a conduit for earmarked contributions and therefore did not exceed the contribution limitations or violate any other provision of the Act.

The response explains that of the $7,500 that FAYPAC contributed to Dole, only $2,500 were direct contributions from the PAC. The response includes copies of the FAYPAC letters transmitting the earmarked checks to the Dole Committee and copies of the checks with "Dole" referenced on the memo lines. The response provides an extensive accounting of the direct contributions, the earmarked contributions, and the reporting of all activity. (Attachment 1, pages 54-123). Therefore, this Office recommends that the Commission take no further action

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against Ernst and Young Los Angeles PAC based on the information in this matter, and close the file as to this respondent.

2. Fluor Corporation Public Affairs Committee

A response to the Commission's reason to believe finding was received from Fluor Corporation Public Affairs Committee ("Fluor") on December 27, 1991. According to FEC records, Fluor made a total of $7,000 in contributions to the Dole Committee ($2,000 over the limits.) The response explains, however, that the second contribution ($2,000) was intended for the Dole Committee's Legal and Accounting Compliance Fund and therefore does not place Fluor in violation of the contribution limits. To support their claim, Fluor included (1) a copy of the PAC's internal funds authorization form which clearly notes that the money is to be contributed to the compliance fund and used for the general election; (2) a copy of the check stub which clearly designates the $2,000 to be used for the general election compliance fund; (3) Fluor's FEC reports which discloses the $2,000 to be used in the general election and earmarked for the compliance fund; and (4) a letter from the Dole Committee advising Fluor that their $2,000 contribution earmarked for the compliance fund was mistakenly deposited into the general account and asking for authorization to transfer the money to the compliance account. (Attachment 1, pages 124-131). It is clear that Flour did everything reasonably expected to ensure that the $2,000 contribution not be designated to the primary election. For that reason, this Office recommends that the Commission take no further action against Fluor Corporation Public Affairs Committee

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and Andrew M. Schwartz, as treasurer, and close the file as to this respondent.

3. General Electric Company PAC

On November 6, 1991, the Commission found reason to believe that General Electric Company PAC (GEPAC) violated the Act by contributing a total of $7,000 to the Dole Committee.[6] In its response filed on January 9, 1992, GEPAC explains that each of the contributions were earmarked to the Dole Committee through GEPAC acting as a conduit. (Attachment 1, pages 132-147). The response includes copies of three checks ($5,000, $1,000 and $1,000) and the letters enclosed with those checks to the Dole Committee specifying that the contributions are earmarked and including the names and addresses of the original contributors. The check numbers correspond to the check numbers specified in the audit report as being the excessive contributions. Based on this information, this Office therefore recommends that the Commission take no further action against General Electric Company PAC and its treasurer and close the file as to this respondent.

4. Hartford Insurance Group PAC

The PAC responds that the Commission is correct that Hartford Insurance Group PAC, a qualified multicandidate committee, did make a $2,000 contribution to the Dole Committee on September 3, 1987, and another contribution of $5,000 on February 22, 1988. The PAC asks that the Commission agree that no violation occurred and close

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6. The Nonpartisan Political Support Committee for G.E. was mistakenly identified as a respondent in this matter. The reason to believe finding against it was rescinded on November 6, 1991, and the current finding issued instead.

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this matter because the excessive amount ($2,000) was refunded by the Dole Committee on May 30, 1988. Attached to the response is a copy of an invoice which accompanied the Dole Committee refund check showing the date of refund as May 30, 1988, and a copy of the PAC's 1988 October Quarterly Report showing the receipt of the $2,000 refund dated September 30, 1988[7]. (Attachment 1, pages 148-153). The Hartford Insurance Group PAC has admittedly contributed to the Dole Committee an amount in excess of the limits set forth in the Act. Therefore, notwithstanding the PAC's receipt of a refund (which was not within the prescribed time limits of the Act), this Office recommends that the Commission offer to enter conciliation prior to a finding of probable cause to believe

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5. Tele-Communications, Inc. PAC

Tele-Communications, Inc. PAC and Gary K. Bracken, as treasurer, responded to the Commission's reason to believe finding on December 27, 1991. (Attachment 1, page 154). The Commission had informed the PAC that records showed a total of $3,000 being contributed to the Dole Committee. The PAC was not a qualified multicandidate committee at the time the contribution was made. The PAC requests pre-probable cause conciliation and asks the Commission to consider that it did request and receive a partial refund of $1,000. This Office recommends that the Commission

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7. The Committee explains that the discrepancy in the receipt and disclosure dates was due to "internal confusion as to how to account for this refund."

accept their request to enter into pre-probable cause conciliation

6. U.S. Federation of Small Businesses PAC

The Commission records show a total of $5,000 being contributed to the Dole Committee by the U.S. Federation of Small Businesses PAC and Carla L. Saunders, as treasurer (BIZPAC). BIZPAC was not a qualified multicandidate committee at the time the contributions were made. In the response received on December 10, 1991, BIZPAC confirms that it made a $1,000 contribution in November of 1987. (Attachment 1, page 155). Then, as BIZPAC explains, anticipating meeting the specifications for becoming a multicandidate committee in May of 1988, (which would increase its contribution limit to $5,000) the PAC wrote and post-dated a $4,000 check to the Dole Committee. The check, dated May 11, 1988, was then inadvertently sent to the Dole Committee in March of 1988. The Dole Committee deposited the check and the bank cleared it. BIZPAC, however, did not become a multicandidate committee until November 1, 1988. BIZPAC then requested a refund which they received from the Dole Committee on April 14, 1988.[8] Although BIZPAC was refunded the excessive amount, the PAC admittedly made a $4,000 excessive contribution. Therefore, this Office recommends

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8. BIZPAC has provided a photocopy of the April 1988, refund check. (Attachment 1, page 249). According to the PAC, it received an unexplained second $4,000 refund from the Dole Committee "several months later", which according to FEC records occurred on June 24, 1988. BIZPAC therefore returned $3,000 to the Dole Committee to effectively bring their aggregate total to $0.

that the Commission offer to enter into pre-probable cause conciliation with BIZPAC

D. Individuals

On November 21, 1991, the Office of the General Counsel notified twenty-three (23) individuals (including two partnerships) that the Commission found reason to believe on October 29, 1991, they violated 2 U.S.C. § 441a(a)(1)(A) by making excessive contributions to the Dole for President Committee ("Dole Committee").[9] In response to the notification of those respondents this Office has received written responses from fourteen (14) individuals. (Attachment 1, pages 1-53). On the basis of the responses received, this Office recommends that the Commission enter into pre-probable conciliation with seven (7) of the individuals and one of the partnerships and approve the conciliation agreements and the proposed civil penalties as discussed individually below.[10] With regard to the remaining six (6) individuals and one (1) partnership from whom responses were received, this Office recommends that the Commission take no further action and close the file as to those respondents. Of the remaining nine (9) respondents, six (6) letters were returned

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9. On November 29, 1991, the Commission rescinded the finding with respect to "Rebma Obermayer", and instead found reason to believe against Obermayer, Rebmann, Maxwell & Hippel to correct an error of mistaken identity.

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because of outdated addresses,[11] no responses were received from two (2) individuals,[12] and notice was received that J.F. O'Shaughnessy is deceased. With regard to the eight (8) individuals not yet located or heard from, because of the inability to locate them and the resources it would take to try to locate them, this Office recommends that the Commission take no further action and close the file. In addition, this Office recommends that the Commission take no further and close the file with respect to J.F. O'Shaughnessy.

Recommendations of No Further Action

1. **J.F. O'Shaughnessy**

The envelope in which Mr. O'Shaughnessy's notification letter was mailed was returned to the Commission unopened. On the envelope were instructions to return to sender, "Mr. O'S is deceased." (Attachment 1, page 1). Therefore, this Office recommends that the Commission take no further action and close the file with respect to this respondent.

2. **U.E. Patrick**

The Dole Committee deposited a $2,500 contribution from Mr. Patrick on February 25, 1988. According to Mr. Patrick's response, received December 9, 1991, he received a letter on March 28 from the Committee advising him of the excessive contribution and asking for reattribution or offering a refund of

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11. Mitzi Ayala- moved, no forwarding address (nfa); Floyd Ayers- moved, nfa; Edna Davol- moved, nfa; Don Hall- no address ever found; Maurice Lancaster- moved, nfa; Katherine McCoy- moved, nfa.

12. No responses were received from Betty Ray Atkins and Doris Freeman.

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the excessive amount. On April 4, 1988, Mr. Patrick signed and mailed back the form with instructions that he receive a full refund. According to Mr. Patrick, not until August 29, 1988, did he receive the refund. According to the FEC Audit workpapers, the Dole Committee made the refund on April 27, 1988. Enclosed with Mr. Patrick's response is the cover letter attached to the Dole refund, dated August 29, 1988, which reads "[w]e apologize for the delay in your refund. We had difficulty getting the payment to the correct address." (Attachment 1, pages 16-22). Given the facts, it is apparent that the Committee timely requested instructions for the disposition of the excessive contribution and likewise Mr. Patrick timely responded with a request for refund. That refund check was drawn on the Dole account 62 days after deposit of the contribution. Its delivery was apparently delayed by mailing errors. Because Mr. Patrick responded timely in requesting a refund and, according to his response, made three inquiries to the Committee about the status of his excessive contribution refund, this Office recommends that the Commission take no further action against Mr. U.E. Patrick and close the file as to this respondent.

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3. Donald Piser

The FEC database shows Donald Piser as having made a $3,000 contribution to the Dole Committee on September 30, 1987, and receiving a $1,000 refund on December 7, 1987, which was 67 days after its receipt. In his response, received on December 2, 1991, Mr. Piser states that he made a contribution to Dole in September, 1987, but that it was for $2,000. (Attachment 1, pages 24-30). He continues that his bank made an error and charged his account

$3,000 instead of $2,000.[13] He claims that he later agreed to a Dole Committee request that the $2,000 be "split into two different funds" but, he states, the enclosed check stub dated December 7, 1987, shows that the $1,000 was actually refunded instead.[14] Mr. Piser concludes that he therefore effectively contributed only $1,000 to the Dole Committee and asks that the Commission correct its records accordingly.

On the 1987 October Quarterly Report, the Dole Committee reported a $3,000 contribution from Donald Piser. On November 30, 1987, the Dole Committee sent a letter to Mr. Piser notifying him that his contribution exceeded the limits and asked for a reattribution or redesignation. On December 7, 1987, Mr. Piser, in response to telephone conversation with the Dole Committee, sent a letter to the Dole Committee confirming that he contributed $1,000 to the Dole for President Committee plus $1,000 to the Legal and Accounting Compliance Fund, and therefore a refund in the amount of $1,000 should be sent. This letter by Mr. Piser seems to indicate that he did contribute $3,000. The Dole Committee reported a $1,000 refund on December 7, 1987 to Mr. Piser, and the Compliance Fund reported a $1,000 receipt from Mr. Piser on December 31, 1987, both transactions apparently in accordance with his instruction in the letter dated December 7. The Dole Committee reports seem to indicate that Mr. Piser did originally contribute $3,000, $1,000 of

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13. He provides a copy of check #262 for $2,000 to the Dole Committee and a copy of his bank statement which shows check #262 as a $3,000 debit.

14. This Office notes that no check stub was included with the response.

which was refunded, $1,000 was kept by Dole for President for the primary election, and $1,000 transferred to the Compliance Fund for the general election which was later transferred to the Penalty and Interest Fund. However, as noted, Mr. Piser has provided a copy of his contribution check to Dole for $2,000, and a bank statement incorrectly showing that check as being for $3,000. If Mr. Piser did contribute only $2,000, received a $1,000 refund on December 7, 1987, and the remaining $1,000 was transferred from the Dole Committee to the Compliance Fund later to be transferred to the Penalty Fund, he still violated the Act because the refund was made after the 60 days as required by the Commission Regulations. Nonetheless, by virtue of the check provided by Mr. Piser, this Office will consider the excessive amount to be $1,000 rather than the $2,000 originally believed.

Therefore, this Office recommends that the Commission take no further action against Donald Piser and close the file as to this respondent.

4. Leroy C. Tombs, Jr.

According to the audit records, Mr. Tombs made a $1,000 contribution to the Dole Committee on November 17, 1987, producing a $2,000 aggregate total, meaning that Mr. Tombs made an earlier $1,000 contribution at some time prior to November, 1987. According to the responses received December 10 and 27, 1991, Mr. Tombs states that he made three contributions to the Dole Committee in 1987. (Attachment 1, pages 34-46). His first contribution was for $1,000 on June 10, 1987. Mr. Tombs agrees

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that he made a second contribution for $250 and a third contribution for $100, both made on November 27, 1987.[15] However, he states that he did not make the second $1,000 November contribution and suggests that perhaps he was mistakenly credited with a contribution that his father, Leroy C. Tombs, Sr., had made. A search of the FEC database shows that the $1,000 contribution dated November 17, 1987, was in fact made by Leroy C. Tombs, Sr., and apparently incorrectly added to the $1,350 total aggregate contributions made by Mr. Tombs, Jr. In his second response to the Commission, Mr. Tombs provides a copy of a $1,000 refund check from the Dole Committee dated July 1, 1988, refunding his June, 1987, contribution. Leroy Tombs, Jr. contributed a total $1,350 to Dole, or $350 over the limit, of which $250 was redesignated to the Compliance Fund, and as a result of the final $1,000 refund, $1,100 was refunded (including the earlier refund of his November 27, $100 contribution.)

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Office recommends that the Commission take no further action against Leroy C. Tombs, Jr., and close the file as to this respondent.

5. Edmund Wartels

The Dole Committee computerized records (and the audit workpapers) show Mr. Wartels as having made three contributions to the Dole Committee; (1) a $3,000 contribution on April 9, 1987, (2)

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15. At the Dole Committee's request Mr. Tombs, Jr. redesignated the $250 contribution to the Compliance Fund and received a refund for the $100 contribution.

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a $333.33 contribution on April 10, 1987, and (3) a $500 contribution on September 18, 1987. The Dole records show a $2,000 refund to Mr. Wartels on June 30, 1987, and a second refund in December of 1987 of $833.33. However, there exists some disparity between the Dole Committee's records and the statements and documentation provided by Mr. Wartels. In his response, received on January 7, 1992, Mr. Wartels states that the law firm of Hall, Dickler, Lawler, Kent & Friedman ("the Firm"), of which he is one of 23 partners, made a $3,000 contribution to Dole in July of 1987. The Dole Committee reported on its 1987 July Quarterly Report a $3,000 contribution on April 9, 1987, from Hall, Dickler, et al. (Attachment 1, pages 47-50). Mr. Wartels provides in his response a copy of a letter from the Dole Committee to Hall, Dickler, et al., advising that they could retain only $1,000 of the contribution and returning the rest to the Firm. Mr. Wartels states that he did not see that letter at that time. How and why the Dole Committee attributed the $3,000 contribution to Mr. Wartels on its computerized records is not known, especially given that the refund letter is addressed to the Firm. The copy of the check has been sent to archives and is not readily available to determine who signed it.

On August 27, 1987, Mr. Wartels continues, he made a personal $1,000 contribution to the Dole Exploratory Committee (not two separate contributions totaling $833.33) and then, in early January, 1988, received a $833.33 refund from the Exploratory Committee. Again, the Dole records do not match the documentation

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provided by Mr. Wartels.[16] Based on Mr. Wartels' documentation and in consideration of the inconsistencies of the Dole computer records on which the reason to believe finding is based, this Office recommends that the Commission take no further action against Mr. Wartels and close the file with respect to this respondent.

6. Dave Williams

According to the response received on December 20, 1991, Mr. Williams made a $1,000 contribution to the Dole Committee on March 30, 1987. (Attachment 1, pages 51-53). On October 15, 1987, Mr. Williams made an additional $2,000 contribution to attend a fundraising event. That contribution was written on a joint account shared by Mr. Williams and his wife. Only Mr. Williams signed that check. However, the accompanying contributor card was signed by both Mr. and Mrs. Williams indicating that it was meant to be joint contribution.[17] According to Commission Regulations, the two signatures on the contributor card are sufficient documentation to equally attribute the contribution. 11 C.F.R. § 9034.2(c)(1). In light of his previous $1,000 contribution, Mr. Wiliams' share of the joint contribution is still in excess of

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16. Furthermore, the Dole computer records list check #2608 as a $500 contribution from Mr. Wartels but the copy of the check provided in his response is clearly check #2608 for $1,000. This seems to indicate that the Dole Committee considered the check a joint contribution. Although it is drawn from a joint account, it is signed by only Mr. Wartels, there is no mention of a contributor card signed by both Wartels, and the Dole Committee did not report a $500 contribution from Mrs. Wartels.

17. It is noted that the Dole Committee did attribute the entire $2,000 contribution to Mr. Williams and therefore refunded $2,000 to him on February 4, 1988.

the limits by $1,000.

this Office recommends that the Commission take no further action against Dave Williams and close the file as to this respondent.

Recommendations of Pre-Probable Cause Conciliation

7. Matthew Clapp

According to his response received on January 2, 1992, Mr. Clapp acknowledges that he made a $5,000 contribution but recalls receiving a $4,000 refund from the Dole Committee, documentation for which he was unable to locate. (Attachment 1, pages 2-5). The audit workpapers show $3,000 of Mr. Clapp's contribution being refunded and $1,000 being transferred to the Compliance Fund. Counsel for Mr. Clapp requests that no further action be taken because of Mr. Clapp's ignorance of the contribution limits.[18] In the alternative, Counsel requests pre-probable cause conciliation for his client. This Office recommends accepting Mr. Clapp's request for pre-probable conciliation

8. Lydia Fried

A response was received on January 6, 1992. Commission records show Lydia Fried as having contributed an aggregate of $3,000 to the Dole Committee. (Attachment 1, pages 7-9). The first contribution was made in July of 1987 for $1,000. A second

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18. As evidence of Mr. Clapp's ignorance and no knowing intent, Counsel candidly states that he also discovered a $5,000 contribution made to Alexander Haig's presidential committee.

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contribution was made in September of 1987 for $2,000. According to the response, the $2,000 contribution was written from a joint bank account and intended to be a joint contribution from herself and her husband, Michael Fried. The Dole Committee's 1987 October Quarterly Report attributes the $2,000 contribution to each individual (resulting in Ms. Fried having a $3,000 aggregate and Mr. Fried having a $2,000 aggregate) and contains a footnote explaining that the Committee could not tell if this was meant to be a joint a contribution and that a reattribution letter would be sent. Ms. Fried does not recall receiving a reattribution letter. Apparently unable to determine from the check whether it was meant to be a joint contribution, the Dole Committee refunded the $2,000 to Lydia Fried in December, 1987 (73 days after the Committee's date of receipt of the $2,000 contribution). The copy of the check has been sent to archives and is not readily available. However, because the Committee was unable to determine from the contribution check whether it was meant to be a joint contribution, the check presumedly would not meet the standards prescribed in the Commission regulations for designating a joint contribution. Therefore, this Office recommends entering into pre-probable cause conciliation with Lydia Fried

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9. John Hamilton

In his response received on December 2, 1991, Mr. Hamilton explains that he wrote a $2,000 check to the Dole Committee to attend a fundraiser with a friend. (Attachment 1, page 6). He was

unaware that he had exceeded the limits until he received, "several months subsequent to the dinner," a refund of $1,000 with a note explaining the contribution limits. The Dole Committee reported a $1,025 refund being made 90 days after the date of deposit. Mr. Hamilton provides no documentation and no explanation for the additional $25 contribution attributed to him. This Office therefore recommends that the Commission offer to enter into pre-probable cause conciliation with Mr. Hamilton

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10. Willis Hesselroth

According to FEC records, Mr. Hesselroth made one $3,000 contribution to Dole in October of 1987. The Dole Committee made a $2,000 refund to Mr. Hesselroth on December 28, 1987, or 61 days after the deposit date. In his response received December 11, 1992, Mr. Hesselroth regrets that he inadvertently violated the Act, offers no explanation, and requests to enter into pre-probable cause conciliation. (Attachment 1, page 10). This Office recommends that the Commission accept his request to enter in conciliation

11. John King

According to FEC records, Mr. King made a $2,500 contribution on March 18, 1988, then received a $1,500 refund from the Dole Committee on June 28, 1988, which was 102 days after the date of deposit. Mr. King's response, received December 3, 1992, confirms the dates and amounts of the above transactions. (Attachment 1,

pages 11-12). He continues that he was not aware of the $1,000 limitation and states that the Dole Committee's failure to timely refund the excess amount of the contribution, while placing him in technical violation of the Act, was not within his control. Mr. King requests that no further action be taken against him. This respondent does not deny or refute the violation for which reason to believe has been found. The contribution was excessive on its face. Therefore, this Office recommends offering to enter into pre-probable cause conciliation

12. Lonnie Pilgrim

In response to our notice that reason to believe was found that Mr. Pilgrim gave a total of $3,000 in two (2) contributions to the Dole Committee, Mr. Pilgrim responded on February 10, 1992, to state that he was able to locate a copy of his March, 1987, $1,000 contribution, but was unable to locate a copy of his October, 1987, $2,000 contribution. (Attachment 1, page 23). He notes in his response that he was married at the time of the contributions, but does not state that a joint contribution was made. According to the FEC database, Mr. Pilgrim and his wife made a total of 51 contributions to federal political committees during the 1987-88 election cycle. The Dole Committee made a $2,000 refund on the 61st day after their receipt of the contribution. Without any evidence or information to refute the fact that Mr. Pilgrim made a $2,000 excessive contribution to the Dole Committee, this Office recommends that the Commission offer to enter into pre-probable cause conciliation with Mr. Pilgrim

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13. Delford Smith

Responses were received on December 9, 1991, and January 6, 1992. (Attachment 1, pages 31-33). FEC records show that Mr. Smith made a $1,000 contribution to the Committee in September of 1987, after making an earlier contribution of $100, which placed Mr. Smith $100 over the contribution limits. The Committee refunded the $100 on December 21, 1987, which was 124 days after receiving the $1,000 contribution. The Committee then received another $1,000 contribution from Mr. Smith on January 22, 1988, which again placed Mr. Smith over the limits, this time by $1,000. The Committee reported refunding $1,000 to Mr. Smith on April 27, 1988, which was 96 days after the Committee received the second $1,000 contribution. The responses state that Mr. Smith's records indicate that checks were written in amounts different from that indicated in the factual and legal analysis, but offers no further explanation or documentation. Counsel for the respondent also states that there is more than one authorized signer on Mr. Smith's personal account, which may have contributed to the problem. Finally, the response states the Commission should consider placing the burden of adhering to the contribution limitations on those who are soliciting the funds and requests pre-probable cause conciliation. With no information provided by the Respondent to refute the reason to believe finding, this Office recommends accepting Mr. Delford Smith's request for pre-probable

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conciliation

Partnerships

14. Obermayer, Rebmann, Maxwell and Hippel

According to the FEC Audit workpapers, the firm of Obermayer, Rebmann et al, ("Obermayer") made a $5,000 contribution in February, 1988, to the Dole Committee and received a $4,000 refund in April, 1988. In their response received December 27, 1991, Obermayer states that it made only one contribution to the Dole Committee which was a $1,000 contribution in June, 1987, and suggests that a typographical error was made which credited the firm with a $5,000 contribution instead. (Attachment 1, pages 13-15). A review of the FEC contributor search index reveals only one contribution from Obermayer to the Dole Committee during the 1987-88 election cycle. That contribution was for $1,000 made in June of 1987. Included in Obermayer's response is a copy of that check. Furthermore, the database shows no refund being made to Obermayer. It appears that the workpapers and the Dole Committee computerized records are in error.[19] The copy of the check on which the reason to believe finding against this Respondent is based has been sent to archives and is not readily available to confirm the Commission's initial assertion. Therefore, this Office recommends that the Commission take no further action against Obermayer,

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19. The Dole Committee provided the FEC auditors with computer tapes on which the committee recorded its campaign financial data. The workpapers were produced directly from those tapes.

Rebmann, Maxwell and Hippel and close the file as to this respondent.

15. Altman Brothers

Altman Brothers is a partnership.[20] According to the audit workpapers Altman Brothers made a $3,000 contribution to the Dole Committee on December 3, 1987. The Dole Committee made a $2,000 refund on June 17, 1988, or 169 days after receipt of the excessive contribution. After having received no response to the Commission's notification, the Respondents were contacted by this Office and then submitted responses on July 17 and July 20, 1992. (Attachment 1, pages 227-229). The Respondents state in the July 17 letter that the $3,000 contribution was made to the Dole Committee and that $1,000 was attributed to each of the three partners of Altman Brothers. In a subsequent discussion with staff of this Office, the Respondents stated that they were not aware of the dual attribution of contributions made by partnerships as provided at 11 C.F.R. § 110.1, which states that a contribution by an unincorporated partnership is attributed to both the partnership and the partners, and shall not exceed the limitation on contributions by individuals, or in the case of a candidate for nomination for President $1,000. This Office therefore recommends that the Commission offer to enter into pre-probable cause conciliation with Altman Brothers

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20. According to the Respondents, Altman Brothers is a partnership within the Altman Group and a separate division from Altman Bros., Inc., which is a Pennsylvania corporation. The copy of the contribution check, provided by the Respondents on July 20, 1992, shows that the contribution was paid out of the Altman Brothers partnership account.

IV. RECOMMENDATIONS

1. Enter into conciliation with the following respondents prior to a finding of probable cause to believe:

   a. Campaign America and Judy Taggert, as treasurer
   b. H & W Aviation
   c. Owens & Associates
   d. RBA Group
   e. Becon Construction Company
   f. Browning-Ferris Industries
   g. Contran
   h. Long Lines Limited
   i. U.S. Federation of Small Business and Carla L. Saunders, as treasurer
   j. Tele-Com., Inc. PAC and Gary K. Bracken, as treasurer
   k. Hartford Insurance Group PAC and Robert J. Mageau, as treasurer
   l. Matthew Clapp
   m. Lydia Fried
   n. John Hamilton
   o. Willis Hesselwoth
   p. John King
   q. Lonnie Pilgrim
   r. Delford Smith
   s. Altman Brothers

2. Take no further action and close the file with respect to the following respondents:

   a. P and D Realty Co.
   b. Betram Associates
   c. Ernst & Young Los Angeles PAC and Harry D. Slaughter, as treasurer
   d. General Electric Company PAC and Robert W. Nelson, as treasurer
   e. Fluor Corporation Public Affairs Committee and Andrew M. Schwartz, as treasurer
   f. J.F. O'Shaughnessy
   g. U .E. Patrick
   h. Donald Piser
   i. Leroy C. Tombs, Jr.
   j. Edmond Wartels
   k. Dave Williams
   l. Obermayer, Rebmann, Maxwell & Hippel
   m. Mitzi Ayala
   n. Floyd Ayers

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o. Edna Davol
p. Don Hall
q. Maurice Lancaster
r. Katherine McCoy
s. Betty Ray Atkins
t. Doris Freeman

3. Approve the attached proposed conciliation agreements and the appropriate letters.

Date 9/18/92

Lawrence M. Noble
General Counsel

Attachments
1. Responses and requests for conciliation
2. Proposed Conciliation Agreements

Staff assigned: Anne Weissenborn
Lawrence D. Parrish
Jeffrey D. Long

93040952603

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20461

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/DONNA ROACH
COMMISSION SECRETARY

DATE: SEPTEMBER 25, 1992

SUBJECT: MUR 3309 - GENERAL COUNSEL'S REPORT
DATED SEPTEMBER 18, 1992

The above-captioned document was circulated to the Commission on MONDAY, SEPTEMBER 21, 1992 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 McDonald	
Commissioner McGarry	
Commissioner Potter	XXX
Commissioner Thomas	XXX

This matter will be placed on the meeting agenda for TUESDAY, SEPTEMBER 29, 1992.

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	)	
	)	
Dole for President Committee and James L. Hagen, as treasurer; Campaign American and Judith F. Taggart, as treasurer; 9 Corporations; 6 Political Committees; 23 Individuals.	)	MUR 3309

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on September 29, 1992, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 3309:

1. Enter into conciliation with the following respondents prior to a finding of probable cause to believe:

   a. Campaign America and Judy Taggert, as treasurer;
   b. H & W Aviation;
   c. Owens & Associates;
   d. RBA Group;
   e. Becon Construction Company;
   f. Browning-Ferris Industries;
   g. Contran;
   h. Long Lines Limited;
   i. Tele-Com., Inc. PAC and Gary K. Bracken, as treasurer;
   j. Hartford Insurance Group PAC and Robert J. Mageau, as treasurer;

(continued)

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k. Matthew Clapp;
l. Lydia Fried;
m. John Hamilton;
o. John King;
p. Altman Brothers;

2. Take no further action and close the file with respect to the following respondents:

a. P and D Realty Co.;
b. Betram Associates;
c. Ernst & Young Los Angeles PAC and Harry D. Slaughter, as treasurer;
d. General Electric Company PAC and Robert W. Nelson, as treasurer;
e. Fluor Corporation Public Affairs Committee and Andrew M. Schwartz, as treasurer;
f. J.F. O'Shaughnessy;
g. U.E. Patrick;
h. Donald Piser;
i. Leroy C. Tombs, Jr.;
j. Edmond Wartels;
k. Dave Williams;
l. Obermayer, Rebmann, Maxwell & Hippel;
m. Mitzi Ayala;
n. Floyd Ayers;
o. Edna Davol;
p. Don Hall;
q. Maurice Lancaster;
r. Katherine McCoy;
s. Betty Ray Atkins;
t. Doris Freeman;
u. U.S. Federation of Small Business and Carla L. Saunders, as treasurer;
v. Willis Hesselwoth;
w. Lonnie Pilgrim;
x. Delford Smith.

(continued)

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3. Approve the proposed conciliation agreements as recommended in the General Counsel's report dated September 18, 1992,

4. Approve the appropriate letters as recommended in the General Counsel's report dated September 18, 1992, subject to amendment of the letters to contain a strong admonishment as agreed during the meeting discussion.

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

Attest:

10-1-92
Date

Marjorie W. Emmons
Secretary of the Commission

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 30, 1992

Kenneth A. Gross, Esquire
Skadden, Arps, Slate, Meagher & Flom
1440 New York Avenue, NW
Washington, DC 20005-21107

RE: MUR 3309
Campaign America, Inc.
Judith F. Taggart, as
treasurer

Dear Mr. Gross:

On October 29, 1991, the Federal Election Commission found reason to believe that Campaign America, Inc., and Judith F. Taggart, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A). At your request, on September 29, 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 clients 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 me at (202) 219-3400.

Sincerely,

Anne A. Weissenborn
Senior Attorney

Enclosure
Conciliation Agreement

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 30, 1992

Marcus T. Hickman, Esquire
Kennedy, Covington, Lobdell & Hickman
3300 NCNB Plaza
Charlotte, NC 28280-6000

Re: MUR 3309
Becon Construction Company

Dear Mr. Hickman:

On October 29, 1991, the Federal Election Commission found reason to believe that Becon Construction Company violated 2 U.S.C. § 441b. At your request, on September 29, 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,

Lawrence D. Parrish

Lawrence D. Parrish
Attorney

Enclosure
Conciliation Agreement

93040952609

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 30, 1992

Lyn Utrecht, Esquire
Manatt, Phelps, Phillips & Kantor
Suite 200
1200 New Hampshire Ave., NW
Washington, DC 20036

Re: MUR 3309
Browning-Ferris Industries

Dear Ms. Utrecht:

This letter is to confirm the Federal Election Commission's receipt of your response requesting that this matter be dismissed. The Commission has reviewed and rejected this request. In an effort to resolve this matter, however, 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,

Lawrence D. Parrish

Lawrence D. Parrish
Attorney

Enclosure
Conciliation Agreement

93040952610

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 30, 1992

Philip S. Beck, Esquire
Kirkland & Ellis
200 East Randolph Drive
Chicago, Illinois 60601

Re: MUR 3309
Contran

Dear Mr. Beck:

On October 29, 1991, the Federal Election Commission found reason to believe that Contran violated 2 U.S.C. § 441b. At your request, on September 29, 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,

Lawrence D. Parrish

Lawrence D. Parrish
Attorney

Enclosure
Conciliation Agreement

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 30, 1992

Geraldine A. Price
H & W Aviation
9400 North Broadway 1700
Oklahoma, OK 73114

RE: MUR 3309
H & W Aviation

Dear Mr. Price:

On October 29, 1991, the Federal Election Commission found reason to believe that H & W Aviation violated 2 U.S.C. § 441b. On September 29, 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 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 me at (202) 219-3400.

Sincerely,

Lawrence D. Parrish

Lawrence D. Parrish
Attorney

Enclosure
Conciliation Agreement

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 30, 1992

Jonathan Sallet
Jenner & Block
601 Thirteenth Street, N.W.
Washington, DC 20005

Re: MUR 3309
Long Lines Limited

Dear Mr. Sallet:

On October 29, 1991, the Federal Election Commission found reason to believe that Long Lines Limited violated 2 U.S.C. § 441b. At your request, on September 29, 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,

Lawrence D. Parrish

Lawrence D. Parrish
Attorney

Enclosure
Conciliation Agreement

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 30, 1992

David C. Owen
Owen and Associates
11827 West 112th Street
Suite 102
Overland Park, NJ 66210

RE: MUR 3309
Owen and Associates

Dear Mr. Owen:

On October 29, 1991, the Federal Election Commission found reason to believe that Owen and Associates violated 2 U.S.C. § 441b. At your request, on September 29, 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 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 me at (202) 219-3400.

Sincerely,

Lawrence D. Parrish

Lawrence D. Parrish
Attorney

Enclosure
Conciliation Agreement

93040952614

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 30, 1992

John J. Maiorana, Esquire
RBA Group
1 Evergreen Place
P.O. Box 1927
Morristown, NJ 07962-1927

Re: MUR 3309
RBA Group

Dear Mr. Maiorana:

On October 29, 1991, the Federal Election Commission found reason to believe that RBA Group violated 2 U.S.C. § 441b. At your request, on September 29, 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 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 me at (202) 219-3400.

Sincerely,

Lawrence D. Parrish

Lawrence D. Parrish
Attorney

Enclosure
Conciliation Agreement

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 30, 1992

Joseph F. Lewandowski
Altman Brothers
115 New Street
Glenside, PA 19038

RE: MUR 3309
Altman Brothers

Dear Mr. Lewandowski:

On October 29, 1991, the Federal Election Commission found reason to believe that Altman Brothers violated 2 U.S.C. § 441a(a)(1)(A). On September 29, 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 Altman Brothers 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) 219-3690.

Sincerely,

Jeffrey D. Long
Paralegal

Enclosure
Conciliation Agreement

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 30, 1992

Thomas J. Lucas, Esquire
Aiken, St. Louis & Siljeg, P.S.
1215 Norton Building
801 Second Avenue
Seattle, Washington 98104

RE: MUR 3309
Matthew N. Clapp. Jr.

Dear Mr. Lucas:

On October 29, 1991, the Federal Election Commission found reason to believe that Matthew N. Clapp, Jr. violated 2 U.S.C. § 441a(a)(1)(A). On September 29, 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) 219-3690.

Sincerely,

Jeffrey D. Long
Paralegal

Enclosure
Conciliation Agreement

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 30, 1992

Lydia Fried
#6 Vendome Court
Bethesda, Maryland 20817

RE: MUR 3309
Lydia Fried

Dear Ms. Fried:

On October 29, 1991, the Federal Election Commission found reason to believe that you violated 2 U.S.C. § 441a(a)(1)(A). On September 29, 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 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 me at (202) 219-3690.

Sincerely,

Jeffrey D. Long
Paralegal

Enclosure
Conciliation Agreement

9304095261 8

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 30, 1992

CONFIDENTIAL

John Hamilton, Senior Vice President
William Wilson & Associates
2929 Campus Drive
Suite 450
San Mateo, CA 94403

RE: MUR 3309
John Hamilton

Dear Mr. Hamilton:

On October 29, 1991, the Federal Election Commission found reason to believe that you violated 2 U.S.C. § 441a(a)(1)(A). On September 29, 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 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 me at (202) 219-3690.

Sincerely,

Jeffrey D. Long
Paralegal

Enclosure
Conciliation Agreement

2304095261 9

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 30, 1992

John W. King
31 Buckingham Road
Norwood, MA 02062

RE: MUR 3309
John King

Dear Mr. King:

On October 29, 1991, the Federal Election Commission found reason to believe that you violated 2 U.S.C. § 441a(a)(1)(A). On September 29, 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 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 me at (202) 219-3690.

Sincerely,

Jeffrey D. Long
Paralegal

Enclosure
Conciliation Agreement

93040952620

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 30, 1992

Colin R. Stoner, Assistant Treasurer
Tele-Communications, Inc. PAC
5619 DTC Parkway
Englewood, CO 80111-3000

RE: MUR 3309
Tele-Communications, Inc. PAC and
Gary K. Bracken, as treasurer

Dear Stoner:

On October 29, 1991, the Federal Election Commission found reason to believe that Tele-Communications, Inc. PAC and Gary K. Bracken, as treasurer, violated 2 U.S.C. § 441a(a)(1)(A). On September 29, 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 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 me at (202) 219-3690.

Sincerely,

Jeffrey D. Long
Paralegal

Enclosure
Conciliation Agreement

9304095262 1

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 30, 1992

Henry Katz, Vice President
The Hartford
Hartford Plaza
Hartford, CT 06115

RE: MUR 3309
Hartford Insurance Group PAC and
Robert J. Mageau, as treasurer

Dear Mr. Katz:

On October 29, 1991, the Federal Election Commission found reason to believe that Hartford Insurance Group PAC and Robert J. Mageau, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A). On September 29, 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 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 me at (202) 219-3690.

Sincerely,

Jeffrey D. Long
Paralegal

Enclosure
Conciliation Agreement

9304095226 22

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 30, 1992

Steven W. Katz, Esquire
Katz & Pantirer
1325 Morris Avenue
P.O. Box 685
Union, New Jersey 07083

Re: MUR 3309
Bertram Associates

Dear Mr. Katz:

On November 21, 1991, Bertram Associates was notified that the Federal Election found reason to believe that Bertram Associates violated 2 U.S.C. § 441b.

After considering the circumstances of the matter, the Commission determined on September 29, 1992, to take no further action against Bertram Associates, and closed the file as it pertains to Bertram Associates. The file will be made public within 30 days after this matter has been closed with respect to all other respondents involved.

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 Bertram Associates's contribution to the Dole Committee appears to be a violation of 2 U.S.C. § 441b. Your client should take immediate steps to insure that this activity does not occur in the future.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Lawrence D. Parrish

Lawrence D. Parrish
Attorney

73040952623

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 30, 1992

Mr. David P. Romano
P and D Realty Company
Morris Canal Plaza
1070 US Highway 46
Ledgewood, NJ 07852

RE: MUR 3309
P and D Realty Company

Dear Mr. Romano:

On November 21, 1991, P and D Realty Company was notified that the Federal Election found reason to believe that P and D Realty Company violated 2 U.S.C. § 441b.

After considering the circumstances of the matter, the Commission determined on September 29, 1992, to take no further action against P and D Realty Company, and closed the file as it pertains to P and D Realty Company. The file will be made public within 30 days after this matter has been closed with respect to all other respondents involved.

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 P and D Realty Company's contribution to the Dole Committee appears to be a violation of 2 U.S.C. § 441b. You should take immediate steps to insure that this activity does not occur in the future.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Lawrence D. Parrish

Lawrence D. Parrish
Attorney

2304095526 24

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 30, 1992

Betty Ray Atkins
21 Canaan Close
New Canaan, CT 06840

RE: MUR 3309

Dear Ms. Atkins:

On November 21, 1991, you were notified that the Federal Election Commission found reason to believe that you violated 2 U.S.C. § 441a(a)(1)(A).

After considering the circumstances of the matter, the Commission determined on September 29, 1992, to take no further action against you and closed the file as it pertains to you. The file will be made public within 30 days after this matter has been closed with respect to all other respondents involved.

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 making excessive contributions is a violation of the Federal Election Campaign Act of 1971, as amended. You should take immediate steps to insure that this activity does not occur in the future.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Jeffrey D. Long
Paralegal

93040952625

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 30, 1992

Mitzi Ayala
744 Lake Terrace Circle
Davis, California

RE: MUR 3309

Dear Ms. Ayala:

On November 21, 1991, you were notified that the Federal Election Commission found reason to believe that you violated 2 U.S.C. § 441a(a)(1)(A).

After considering the circumstances of the matter, the Commission determined on September 29, 1992, to take no further action against you and closed the file as it pertains to you. The file will be made public within 30 days after this matter has been closed with respect to all other respondents involved.

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 making excessive contributions is a violation of Federal Election Campaign Act of 1971, as amended. You should take immediate steps to insure that this activity does not occur in the future.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Jeffrey D. Long
Paralegal

2304095226

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 30, 1992

Floyd M. Ayers
19838 Encino Brook Street
San Antonio, TX 78359

RE: MUR 3309

Dear Mr. Ayers:

On November 21, 1991, you were notified that the Federal Election Commission found reason to believe that you violated 2 U.S.C. § 441a(a)(1)(A).

After considering the circumstances of the matter, the Commission determined on September 29, 1992, to take no further action against you and closed the file as it pertains to you. The file will be made public within 30 days after this matter has been closed with respect to all other respondents involved.

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 making excessive contributions is a violation of the Federal Election Campaign Act of 1971, as amended. You should take immediate steps to insure that this activity does not occur in the future.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Jeffrey D. Long
Paralegal

2340952627

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 30, 1992

Edna N. Davol
40 Holbrook Avenue
Rumford, RI 02916

RE: MUR 3309

Dear Ms. Davol:

On November 21, 1991, you were notified that the Federal Election Commission found reason to believe that you violated 2 U.S.C. § 441a(a)(1)(A).

After considering the circumstances of the matter, the Commission determined on September 29, 1992, to take no further action against you and closed the file as it pertains to you. The file will be made public within 30 days after this matter has been closed with respect to all other respondents involved.

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 making excessive contributions is a violation of the Federal Election Campaign Act of 1971, as amended. You should take immediate steps to insure that this activity does not occur in the future.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Jeffrey D. Long

Jeffrey D. Long
Paralegal

2304095262 8

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 30, 1992

Doris E. Freeman
1103 Edgewater Drive
Orlando, Florida 32804

RE: MUR 3309

Dear Ms. Freeman:

On November 21, 1991, you were notified that the Federal Election Commission found reason to believe that you violated 2 U.S.C. § 441a(a)(1)(A).

After considering the circumstances of the matter, the Commission determined on September 29, 1992, to take no further action against you and closed the file as it pertains to you. The file will be made public within 30 days after this matter has been closed with respect to all other respondents involved.

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 making excessive contributions is a violation of the Federal Election Campaign Act of 1971, as amended. You should take immediate steps to insure that this activity does not occur in the future.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Jeffrey D. Long
Paralegal

9304095226229

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 30, 1992

Willis Hesselroth
4433 Seaforest Drive
Kiawah Island, South Carolina 29455

RE: MUR 3309

Dear Mr. Hesselroth:

On November 21, 1991, you were notified that the Federal Election Commission found reason to believe that you violated 2 U.S.C. § 441a(a)(1)(A). On December 11, 1991, you submitted a response to the Commission's reason to believe finding.

After considering the circumstances of the matter, the Commission determined on September 29, 1992, to take no further action against you and closed the file as it pertains to you. The file will be made public within 30 days after this matter has been closed with respect to all other respondents involved.

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 making excessive contributions is a violation of the Federal Election Campaign Act of 1971, as amended. You should take immediate steps to insure that this activity does not occur in the future.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Jeffrey D. Long
Paralegal

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 30, 1992

Maurice A. Lancaster
12204 Alhambra
Leewood, Kansas 66209

RE: MUR 3309

Dear Mr. Lancaster:

On November 21, 1991, you were notified that the Federal Election Commission found reason to believe that you violated 2 U.S.C. § 441a(a)(1)(A).

After considering the circumstances of the matter, the Commission determined on September 29, 1992, to take no further action against you and closed the file as it pertains to you. The file will be made public within 30 days after this matter has been closed with respect to all other respondents involved.

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 making excessive contributions is a violation of the Federal Election Campaign Act of 1971, as amended. You should take immediate steps to insure that this activity does not occur in the future.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Jeffrey D. Long
Paralegal

2304095263 1

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 30, 1992

Katherine F. McCoy
P.O. Box 2413
West Palm Beach, Florida 33402

RE: MUR 3309

Dear Ms. McCoy:

On November 21, 1991, you were notified that the Federal Election Commission found reason to believe that you violated 2 U.S.C. § 441a(a)(1)(A).

After considering the circumstances of the matter, the Commission determined on September 29, 1992, to take no further action against you and closed the file as it pertains to you. The file will be made public within 30 days after this matter has been closed with respect to all other respondents involved.

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 making excessive contributions is a violation of the Federal Election Campaign Act of 1971, as amended. You should take immediate steps to insure that this activity does not occur in the future.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Jeffrey D. Long
Paralegal

9340952632

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 30, 1992

Robert Whitelaw, Esq.
Obermayer, Rebmann, Maxwell & Hippel
14th Floor Packard Building
S.E. Corner 15th and Chestnut Streets
Philadelphia, Pennsylvania 19102

RE: MUR 3309

Dear Mr. Whitelaw:

On November 21, 1991, you were notified that the Federal Election Commission found reason to believe that Obermayer, Rebmann, Maxwell & Hippel, violated 2 U.S.C. § 441a(a)(1)(A). On December 27, 1991, you submitted a response to the Commission's reason to believe finding.

After considering the circumstances of the matter, the Commission determined on September 29, 1992, to take no further action against Obermayer, Rebmann, Maxwell & Hippel, and closed the file as it pertains to Obermayer, Rebmann, Maxwell & Hippel. The file will be made public within 30 days after this matter has been closed with respect to all other respondents involved.

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 making excessive contributions is a violation of the Federal Election Campaign Act of 1971, as amended. You should take immediate steps to insure that this activity does not occur in the future.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Jeffrey D. Long
Paralegal

93040952633

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 30, 1992

Richard W. Schuermann, Jr.
Emens, Hurd, Kegler & Ritter Co., L.P.A.
65 E. State Street, Suite 1800
Columbus, Ohio 43215-4294

RE: MUR 3309
U.E. Patrick

Dear Mr. Schuermann:

On November 21, 1991, you were notified that the Federal Election Commission found reason to believe that U.E. Patrick, violated 2 U.S.C. § 441a(a)(1)(A). On December 9, 1991, you submitted a response to the Commission's reason to believe finding.

After considering the circumstances of the matter, the Commission determined on September 29, 1992, to take no further action against U.E. Patrick, and closed the file as it pertains to U.E. Patrick. The file will be made public within 30 days after this matter has been closed with respect to all other respondents involved.

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 making excessive contributions is a violation of the Federal Election Campaign Act of 1971, as amended. You should take immediate steps to insure that this activity does not occur in the future.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Jeffrey D. Long
Paralegal

2304095263 4

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 30, 1992

James G. Vetter, Jr.
Godwin, Carlton & Maxwell
3300 NCNB Plaza
901 Main Street
Dallas, Texas 75202

RE: MUR 3309
Lonnie Ken Pilgrim

Dear Mr. Vetter:

On November 21, 1991, you were notified that the Federal Election Commission found reason to believe that Lonnie Ken Pilgrim violated 2 U.S.C. § 441a(a)(1)(A). On February 10, 1992, you submitted a response to the Commission's reason to believe finding.

After considering the circumstances of the matter, the Commission determined on September 29, 1992, to take no further action against Lonnie Ken Pilgrim, and closed the file as it pertains to Lonnie Ken Pilgrim. The file will be made public within 30 days after this matter has been closed with respect to all other respondents involved.

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 making excessive contributions is a violation of the Federal Election Campaign Act of 1971, as amended. You should take immediate steps to insure that this activity does not occur in the future.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Jeffrey D. Long

Jeffrey D. Long
Paralegal

9304095263 5

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 30, 1992

Donald H. Piser
45 West 60th Street, 32K
New York, NY 10023

RE: MUR 3309

Dear Mr. Piser:

On November 21, 1991, you were notified that the Federal Election Commission found reason to believe that you violated 2 U.S.C. § 441a(a)(1)(A). On December 2, 1991, you submitted a response to the Commission's reason to believe finding.

After considering the circumstances of the matter, the Commission determined on September 29, 1992, to take no further action against you and closed the file as it pertains to you. The file will be made public within 30 days after this matter has been closed with respect to all other respondents involved.

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 making excessive contributions is a violation of the Federal Election Campaign Act of 1971, as amended. You should take immediate steps to insure that this activity does not occur in the future.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Jeffrey D. Long
Paralegal

9304095526336

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 30, 1992

Dennis V. Griffiths
3850 Three Mile Lane
McMinnville, Oregon 97128

RE: MUR 3309
Delford M. Smith

Dear Mr. Griffiths:

On November 21, 1991, you were notified that the Federal Election Commission found reason to believe that Delford M. Smith violated 2 U.S.C. § 441a(a)(1)(A). On January 6, 1992, you submitted a response to the Commission's reason to believe finding.

After considering the circumstances of the matter, the Commission determined on September 29, 1992, to take no further action against Delford M. Smith, and closed the file as it pertains to Delford M. Smith. The file will be made public within 30 days after this matter has been closed with respect to all other respondents involved.

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 making excessive contributions is a violation of the Federal Election Campaign Act of 1971, as amended. You should take immediate steps to insure that this activity does not occur in the future.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Jeffrey D. Long
Paralegal

9304095263 7

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 30, 1992

Leroy C. Tombs, Jr.
8304 Oakland
Kansas City, Kansas 66011

RE: MUR 3309

Dear Mr. Tombs:

On November 21, 1991, you were notified that the Federal Election Commission found reason to believe that you violated 2 U.S.C. § 441a(a)(1)(A). On December 9, 1991, you submitted a response to the Commission's reason to believe finding.

After considering the circumstances of the matter, the Commission determined on September 29, 1992, to take no further action against you and closed the file as it pertains to you. The file will be made public within 30 days after this matter has been closed with respect to all other respondents involved.

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 making excessive contributions is a violation of the Federal Election Campaign Act of 1971, as amended. You should take immediate steps to insure that this activity does not occur in the future.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Jeffrey D. Long
Paralegal

9304095263 8

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 30,1992

Edmund S. Wartels
Crow Hill Road
Mt. Kisco, NY 10549

RE: MUR 3309

Dear Mr. Wartels:

On November 21, 1991, you were notified that the Federal Election Commission found reason to believe that you violated 2 U.S.C. § 441a(a)(1)(A). On January 7, 1992, you submitted a response to the Commission's reason to believe finding.

After considering the circumstances of the matter, the Commission determined on September 29, 1992, to take no further action against you, and closed the file as it pertains to you. The file will be made public within 30 days after this matter has been closed with respect to all other respondents involved.

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 making excessive contributions is a violation of the Federal Election Campaign Act of 1971, as amended. You should take immediate steps to insure that this activity does not occur in the future.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Jeffrey D. Long
Paralegal

9304095226639

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 30, 1992

Lyn Utrecht
Manatt, Phelps, Phillips & Kantor
1200 New Hampshire Avenue, NW
Suite 200
Washington, DC 20036-6889

RE: MUR 3309
Dave Williams

Dear Ms. Utrecht:

On November 21, 1991, you were notified that the Federal Election Commission found reason to believe that Dave Williams violated 2 U.S.C. § 441a(a)(1)(A). On December 20, 1991, you submitted a response to the Commission's reason to believe finding.

After considering the circumstances of the matter, the Commission determined on September 29, 1992, to take no further action against Dave Williams, and closed the file as it pertains to Dave Williams. The file will be made public within 30 days after this matter has been closed with respect to all other respondents involved.

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 making excessive contributions is a violation of the Federal Election Campaign Act of 1971, as amended. You should take immediate steps to insure that this activity does not occur in the future.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Jeffrey D. Long
Paralegal

2340952640

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 30, 1992

Carla L. Saunders, Treasurer
U.S. Federation of
Small Businesses PAC
208 G Street, N.E.
Washington, D.C. 20002

RE: MUR 3309
U.S. Federation of Small Businesses and Carla L. Saunders, as treasurer

Dear Ms. Saunders:

On November 21, 1991, you were notified that the Federal Election Commission found reason to believe that U.S. Federation of Small Businesses PAC and Carla L. Saunders, as treasurer (UFSB), violated 2 U.S.C. § 441a(a)(1)(A). On December 10, 1991, you submitted a response to the Commission's reason to believe finding.

After considering the circumstances of the matter, the Commission determined on September 29, 1992, to take no further action against UFSB, and closed the file as it pertains to U.S. Federation of Small Businesses and Carla L. Saunders, as treasurer. The file will be made public within 30 days after this matter has been closed with respect to all other respondents involved.

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 making excessive contributions is a violation of the Federal Election Campaign Act of 1971, as amended. You should take immediate steps to insure that this activity does not occur in the future.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Jeffrey D. Long

Jeffrey D. Long
Paralegal

2304095264 1

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 30, 1992

R. Todd Johnson
Jones, Day, Reavis & Pogue
Metropolitan Square
1450 G. Street, N.W.
Washington, D.C. 20005-2088

RE: MUR 3309
Ernst & Young Los Angeles PAC and
Harry D. Slaughter, as treasurer

Dear Mr. Johnson:

On November 21, 1991, you were notified you that the Federal Election Commission found reason to believe that Ernst & Young Los Angeles PAC and Harry D. Slaughter, as treasurer, violated 2 U.S.C. § 441a(a)(1)(A). On January 31, 1992, you submitted a response to the Commission's reason to believe finding.

After considering the circumstances of the matter, the Commission determined on September 29, 1992, to take no further action against Ernst & Young Los Angeles PAC and Harry D. Slaughter, as treasurer, and closed the file as it pertains to Ernst & Young Los Angeles PAC and Harry D. Slaughter, as treasurer. The file will be made public within 30 days after this matter has been closed with respect to all other respondents involved.

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.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Jeffrey D. Long
Paralegal

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 30, 1992

Vigo G. Nielsen, Jr.
Nielsen, Merksamer, Hodgson,
Parrinello & Mueller
591 Redwood Highway, #4000
Mill Valley, California 94941

RE: MUR 3309
Fluor Corporation Public Affairs
Committee and Andrew M. Schwartz,
as treasurer

Dear Mr. Nielsen:

On November 21, 1991, you were notified that the Federal Election Commission found reason to believe that Fluor Corporation Public Affairs Committee and Andrew M. Schwartz, as treasurer, violated 2 U.S.C. § 441a(a)(1)(A). On December 27, 1991, you submitted a response to the Commission's reason to believe finding.

After considering the circumstances of the matter, the Commission determined on September 29, 1992, to take no further action against Fluor Corporation Public Affairs Committee and Andrew M. Schwartz, as treasurer, and closed the file as it pertains to Fluor Corporation Public Affairs Committee and Andrew M. Schwartz, as treasurer. The file will be made public within 30 days after this matter has been closed with respect to all other respondents involved.

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.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Jeffrey D. Long

Jeffrey D. Long
Paralegal

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 30, 1992

Carol Laham, Esquire
Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, D.C. 20006

RE: MUR 3309
General Electric Company PAC and
Robert W. Nelson, as treasurer

Dear Ms. Laham:

On November 21, 1991, your clients were notified that the Federal Election Commission found reason to believe that General Electric Company PAC and Robert W. Nelson, as treasurer, violated 2 U.S.C. § 441a(a)(1)(A). On January 9, 1992, you submitted a response to the Commission's reason to believe finding.

After considering the circumstances of the matter, the Commission determined on September 29, 1992, to take no further action against General Electric Company PAC and Robert W. Nelson, as treasurer, and closed the file as it pertains to General Electric Company PAC and Robert W. Nelson, as treasurer. The file will be made public within 30 days after this matter has been closed with respect to all other respondents involved.

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.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Jeffrey D. Long

Jeffrey D. Long
Paralegal

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COMMISSION
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Nov 5 11 10 AM '92

November 4, 1992

Mr. Jeffrey D. Long
Federal Election Commission
999 E. Street, NW
Washington, DC 20463

MUR 3309

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
92 NOV -6 AM 11:50

Dear Mr. Long,

Enclosed please find an executed copy of the conciliation agreement and my check for $500.00 in penalty.

If you need any further information from me do not hesistate to contact me. My new address is 9123 Town Gate Lane, Bethesda, MD 20817.

Sincerely,

Lydia Fried

Lydia Fried

93040952645

7920 Queenair Drive, Gaithersburg, Maryland 20879 301-977-8887 Fax: 301-330-9287

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
92 NOV 12 AM 9:15

LAW OFFICES

JENNER & BLOCK

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

601 THIRTEENTH STREET, N. W.
TWELFTH FLOOR
WASHINGTON, D. C. 20005

(202) 639-6000
(202) 639-6066 FAX

DIRECT DIAL NUMBER:
202-639-6030

JONATHAN B. SALLET

CHICAGO OFFICE
ONE IBM PLAZA
CHICAGO, IL 60611
(312) 222-9350
(312) 527-0484 FAX

MIAMI OFFICE
ONE BISCAYNE TOWER
MIAMI, FL 33131
(305) 530-3535
(305) 530-0008 FAX

LAKE FOREST OFFICE
ONE WESTMINSTER PLACE
LAKE FOREST, IL 60045
(708) 295-9200
(708) 295-7810 FAX

November 11, 1992

92 NOV 12 PM 3:05
RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

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

Re: In the Matter of Long Lines Limited
MUR 3309

Dear Mr. Noble:

Enclosed please find the original Conciliation Agreement executed by D. Jon Winkel, Chief Executive Officer of Long Lines Limited, along with a check in the amount of $950, which constitutes payment in full of the civil penalty imposed by the FEC under 2 U.S.C. § 437g(a)(5)(A).

We would appreciate receiving a copy of the Conciliation Agreement once it has been fully executed by the FEC.

Sincerely,

Jonathan B. Sallet

Enclosures
cc: D. Jon Winkel

93040952646

LONG LINES, LIMITED

CHECK NO. 003375

ENDOR:

VOUCHER NO.	INVOICE NO.	INVOICE DATE	INVOICE AMOUNT	AMOUNT PAID	DISCOUNT TAKEN	NET CHECK AMOUNT
						950.00

Civil Penalty

92 NOV 12 PM 3:05

CHECK NO. 003375

CHECK NO.	CHECK DATE	VENDOR NO.
003375	11/04/92	

LONG LINES, LIMITED
600 N. DERBY LANE, P.O. BOX 950
NORTH SIOUX CITY, SOUTH DAKOTA

FIRST WISCONSIN BANK OF WAUSAU
WAUSAU, WISCONSIN

79-1160/759

CHECK AMOUNT
950.00

Nine hundred fifty & no/100----------Dollars

PAY TO THE ORDER OF
Federal Election Commission
Washington
DC 20463

Paul Bergman
AUTHORIZED SIGNATURE

⑈003375⑈ ⑆075911603⑆ 16⑈484⑈9⑈

⑆0400526⑆ 47 930

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F.E.C.
SECRETARIAT
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BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

In the Matter of)
)
) MUR 3309
)
Dole for President Committee)
and James L. Hagen, as treasurer)

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On October 29, 1991, the Commission found reason to believe that the Dole for President Committee and James L. Hagen, as treasurer, ("the Committee") violated 2 U.S.C. §§ 434, 441a(b)(1)(A), 441a(f), and 441b, and 26 U.S.C. § 9035(a). On December 19, 1991, counsel for the Committee requested pre-probable cause conciliation, but expressed reservations about entering into conciliation until after the Commission had made its final repayment determination regarding the Committee, pursuant to 26 U.S.C. § 9038 and 11 C.F.R. § 9038.2(d)(2). On February 6, 1992, the Commission made its final repayment determination, and the Commission's Statement of Reasons was issued.

II. ANALYSIS

A. Violation of 2 U.S.C. § 441a(f) In-Kind Contributions by Campaign America

The Commission's reason to believe determination that the Committee violated 2 U.S.C. §§ 441a(f) and 441a(b)(1)(A) involved testing-the-waters expenditures totaling $38,406.61 made on behalf of the Committee by Campaign America, a registered multicandidate committee associated with Robert Dole. These expenditures

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included $33,889.32 in Iowa-related payments, consisting of $14,684.35 spent in connection with three town meetings and a breakfast meeting held in Iowa in February, 1987, at which Senator Dole appeared, $10,214.70 in staff expenses associated with these same events, and partial payments of $8,010.67 and $979.60 for a Campaign America telemarketing program designed in part to create a list of Dole supporters.

More recently it has come to the attention of this Office that there were additional Campaign America expenditures identified by the Audit Division totaling $6,522.50 which were made in connection with the four Iowa events cited above, but which were not included in the sum upon which the Commission's reason to believe determination was based.[1] Campaign America also incurred a further $1,476 in expenditures to International Tours for interstate transportation related to the four events involving Tom Synhorst, a Campaign America staff member at the time and later Dole for President Committee regional director for Iowa and Kansas. None of these particular payments was allocable to the Dole campaign's spending limitation in Iowa because they involved interstate transportation, (See former 11 C.F.R. § 106.2(c)(4)(1989)), but they did constitute testing-the-waters expenditures on behalf of the Dole campaign by virtue of their connection with the town meetings and breakfast.

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1. This $6,522.50 included $1,938 paid to Long Line Communications, $983.50 paid to Growth Industries, $598 paid to International Tours of Alexandria, $1,383 paid to REFCO Incorporated, and $1,620 paid to KVI Aviation.

The addition of the interstate transportation expenditures discussed above to the earlier figure of $33,889.32 brings to $41,887.82 Campaign America's expenditures in Iowa on behalf of the Dole campaign.

With regard to New Hampshire, Campaign America made 117 payments totaling $3,136.26 for voter lists and $2,223.16 for a business telephone with a number later used by the Dole committee. Only $1,381.03 of the $2,223.16 was allocable to New Hampshire, and it was this figure which was included in the $38,406.61 which formed the basis for the Commission's reason to believe determination. In reality the entire $2,223.16 represented testing-the-waters expenditures on behalf of the Dole campaign. Thus, total in-kind contributions by Campaign America to Dole for President which arose from activities in New Hampshire came to $5,359.42.

In summary, testing-the-waters expenditures made by Campaign America on behalf of the Dole for President Committee totaled $47,247.24, including $41,917.82 in Iowa and $5,359.42 in New Hampshire. These expenditures constituted in-kind contributions to the Committee, resulting in its receipt of excessive contributions in violation of 2 U.S.C. § 441a(f).

B. Violation of 2 U.S.C. § 441a(b)(1)(A)

The Commission found reason to believe that the Committee violated 2 U.S.C. § 441a(b)(1)(A) by exceeding with respect to Iowa and New Hampshire the state-by-state expenditure limitations for presidential candidates who accept public funds. This determination was based in part upon the original allocations to

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these two states made by the Committee plus additional allocations which the Committee expressly accepted following the Commission's audit; as a result of these latter allocations the Committee exceeded the limitations by at least $43,889.66 in Iowa and $40,454.53 in New Hampshire. In addition, by the time of the Commission's reason to believe determination the Committee was apparently no longer contesting certain other allocations, which raised the amounts of excessive expenditures to $241,725.76 and $227,104.14 in Iowa and New Hampshire respectively.

The Committee continued to challenge certain additional allocations, namely expenditures of $28,450.36 in Iowa and $13,997.06 in New Hampshire for travel undertaken by Robert and Elizabeth Dole; expenses incurred for the New England Regional Office totaling $54,341.62; media commissions of $2,664.64 related to Iowa and $2,988.08 related to New Hampshire; and testing-the-waters expenditures totaling $33,889.32 in Iowa and $4,517.29 in New Hampshire which had been made by Campaign America (See discussion above). In making its final repayment determination, the Commission reduced the amount of allocable New England Regional Office expenditures to $38,465.97 and dropped the earlier allocations of media commissions. The remaining additional allocations pursuant to the Commission's audit are as follows:

Additional Audit Allocations	Iowa	New Hampshire
1. Dole Travel	$28,450.36	$13,997.06
2. New England Regional Office	-0-	38,465.97
3. Testing the Waters Expenditures Made by Campaign America	33,889.32	4,517.29
Total additional amounts:	**$ 62,339.68**	**$ 56,980.32**

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Thus, the Commission has determined that the Committee exceeded its statutory expenditure limitations by $304,065.44 ($241,725.76 + $62,330.68) in Iowa and by $284,084.46 in New Hampshire ($227,104.14 + $56,980.32), for a total of $588,149.90. These excessive state-by-state expenditures result in the violation of 2 U.S.C. § 441a(b)(1)(A) by the Committee.

C. Receipt of Corporate Contributions

The Commission found reason to believe the Committee violated 2 U.S.C. § 441b by accepting contributions from 213 corporations totaling $68,043.38.

1. Reimbursements for Use of Corporate Aircraft

Two of the 213 apparent corporate contributions involved the use of corporate aircraft for which the Committee had apparently made reimbursements which were less than the fair market prices for the services provided. Information gathered during this Office's investigation into these two contributions is set out in the General Counsel's Report in this matter dated September 18, 1992, which addresses all respondents except the Committee.

In the case of H & W Aviation,[2] it remains the position of this Office that, because the Committee was charged $2,750 less than the standard fare of $14,750 for services provided, the company made an in-kind contribution. Thus, this Office recommends that the Commission continue to pursue the Committee's receipt of an in-kind contribution from H & W Aviation.

2. This was a joint venture composed of two corporations, Wilson and Wilson, Inc., and Hadson Aviation, Inc. The effect is the same as if the partnership were incorporated.

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As for Owen & Associates, the Committee reimbursed this company for $9,905 for the use of a private airplane, an amount which still appears to have been $1,000 less than the normal and usual charge based upon a charter rate of $150 per hour and the Committee's use of 72.7 hours. No information has been received supporting an initial claim by the Committee that the $1,000 represented an (unnamed) individual's payment for his or her own transportation which would be exempt from the definition of "contribution," pursuant to 11 C.F.R. § 100.7(b)(8). Therefore, this amount should be included within the total of corporate contributions received.

2. Other Corporate Contributions

With regard to the remaining 211 apparent corporate contributions totaling $64,293.38, information submitted during the Commission's investigation by two of the individual companies has revealed that their contributions should no longer be included in the Committee's violation of 2 U.S.C. § 441b. They should, however, be treated as excessive contributions from partnerships.

a. P and D Realty Co.

P and D Realty Co. has stated that it is a partnership, not a corporate entity, and has provided a copy of its partnership agreement. The Office of the New Jersey Secretary of State has confirmed this status. Therefore, receipt of the $2,000 contribution made by this company should no longer be treated as a violation of 2 U.S.C. § 441b. It did, however, exceed the $1,000 limitation for contributions from persons, including partnerships, established at 2 U.S.C. § 441a(a)(1)(A), and thus its receipt

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resulted in a violation of 2 U.S.C. § 441a(f) by the Committee.

b. Bertram Associates

Bertram Associates has also asserted that it is a partnership. On April 18, 1992, this Office received a letter from Bertram's counsel enclosing a copy of a letter from the company's bank. The letter stated that the account on which the contribution check was drawn was a partnership account. Thus, the $2,000 contribution at issue should no longer be considered a violation of 2 U.S.C. § 441b. Again, it exceeded the $1,000 limitation on partnership contributions and its receipt resulted in a violation by the Committee of 2 U.S.C. § 441a(f).

3. Summary

Of the 213 apparent corporate contributions initially at issue in this matter, 211 totaling $64,043 remain.[3] Of this amount, $7,201 has been refunded, but not in a timely fashion. Thus, the Commission should include in its proposed conciliation agreement the violation of 2 U.S.C. § 441b(a) as regards these contributions.

D. Failure to Make Advance Payments for Use of Aircraft

The Commission also found reason to believe that the Committee violated 2 U.S.C. § 441b by failing to reimburse 15 corporations in advance for use of their aircraft as required by 11 C.F.R. § 114.9(e) and also by receiving a $2,475 in-kind contribution from Becon Construction Company when that company accepted an amount which was $2,475 lower than the amount billed as payment for the

3. See General Counsel's Report in this matter dated September 18, pages 11-19, for discussion of responses received from five of these remaining corporations.

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use of an aircraft. The total involved in these violations is $54,264.85. No documentation or other information has been received which would reduce the amount of these violations.

The Commission should include in its proposed agreement $54,264.85 in additional corporate contributions resulting from the failure to make advance payments for use of corporate aircraft and to pay the full amount billed by Becon Construction Company.

E. Violations of 2 U.S.C. § 441a(f) - Receipt of Excessive Contributions

1. From Individuals

The Commission's finding of reason to believe that the Committee violated 2 U.S.C. § 441a(f) was based in part upon its knowing acceptance of 544 contributions totaling $242,131.81 from 418 individuals in excess of the $1,000 limitation established at 2 U.S.C. § 441a(a)(1)(A).[4] All of these contributions had been refunded, but not within the 60 day timeframe required by the Commission's regulations. 11 C.F.R. § 110.1.

More recently, information received from three of these contributors, namely Donald Piser, Leroy C. Tombs, Jr., and Dave Williams, has revealed that the amount of their contributions should be reduced by $1,000 each, thus also reducing the total amount of excessive contributions from individuals to $239,131.81.[5]

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4. An additional $5,000 contribution from a partnership is discussed below.

5. Mr. Piser has provided documentation showing that the amount of his single contribution was $2,000 rather than $3,000. Mr. Tombs has shown that $1,000 of his $2,350 in aggregated contributions was in fact made by his father, Leroy C. Tombs, Sr.

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2. From Political Committees

The Commission's finding of violations of 2 U.S.C. § 441a(f) also included the knowing receipt of contributions totaling $18,875 from 11 political committees that exceeded the $1,000 statutory limitation for non-multicandidate committees and the $5,000 limitation for multicandidate committees. Again, with the exception of $3,000 from Tele-Communications PAC, these contributions had been refunded, but apparently not within the required 60-day time period. 11 C.F.R. §§ 110.1 and 110.2.

Information received from three of these committees, Ernst and Young Los Angeles - PAC, Fluor Corporation Public Affairs Committee, and General Electric Company PAC, indicates that $6,500 of the amount deemed excessive did not in fact represent contributions to the Committee's primary election account. Ernst and Young Los Angeles - PAC has responded that the total of $7,500 in contributions attributed to itself actually came from another committee, Federal Arthur Young & Company PAC ("FAYPAC"), and that $5,000 out of the $7,500 consisted of earmarked checks for which FAYPAC acted as a conduit, leaving only $2,500 in direct contributions. The Fluor Corporation PAC has argued and documented that $2,000 of the $7,000 attributed to itself was intended for the Dole Committee's Legal and Accounting Compliance

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(Footnote 5 continued from previous page)
Mr. Williams, whose reported contributions totaled $3,000, has submitted a contributor card which accompanied his contribution and which shows that a $2,000 contribution was made jointly by himself and his wife. (See General Counsel's Report dated September 18, pages 27-30 and 32 for full discussion of these responses.)

Fund for use in the general election. GEPAC states, and has documented, that all of the $7,000 which it sent to the Committee consisted of earmarked contributions for which the GEPAC acted as the conduit.[6]

It has been shown that the excessive portion of the contribution received from a fourth committee, U.S. Federation of Small Businesses PAC ("BIZPAC"), was in fact refunded within the required 60-day time frame. BIZPAC has confirmed that it made a $1,000 contribution to the Dole campaign in November, 1987, and then, in anticipation of becoming a multicandidate committee, wrote and post-dated a $4,000 check which was inadvertently sent to the Dole comittee in March, 1988. The Dole committee deposited the check. BIZPAC did not in fact become a multicandidate committee until November, 1988. BIZPAC requested a refund from the Dole committee, and a refund of $4,000 was received on April 14, 1988.

On the basis of these adjustments, the total of excessive committee contributions received should be reduced to $8,375.

3. Contributions to Compliance Fund

Presidential candidates are permitted by the Commission's regulations to accept contributions to a legal and accounting compliance fund prior to nomination for use if the candidate becomes a candidate in the general election. Such candidates are also permitted to deposit redesignated contributions which exceed the candidate's limitation for the primary election into such an

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6. See General Counsel's Report dated September 18, 1992, pages 20-22 for full discussion of these responses.

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account. 11 C.F.R. § 9003.3(a)(1). If the candidate does not continue into the general election, any contribution made with respect to that election must be refunded, redesignated or reattributed. Such refunds, redesignations, and reattributions are to be made within sixty days from the date of the nomination for president by the party of the a candidate who is not the nominee. 11 C.F.R. § 102.9(e).

The Committee sought redesignation for, and transferred to a compliance fund, $102,662.55 in otherwise excessive contributions received for the primary election. It also received $16,292 in direct contributions to the fund. The Republican Party nominated its candidate for President on August 17, 1988; therefore, the Committee should have refunded, redesignated or reattributed these contributions within sixty days of that date or no later than October 16, 1988.

Through September 30, 1988, $19,542.00 in refunds were reported. Further, in response to a letter offering either redesignations to a Penalty and Interest Fund or refunds, contributors redesignated $50,814 to this latter fund within the required sixty days. This left $48,598.55 in the compliance fund which had not been refunded or redesignated by October 16, 1988. The Committee later reported making $41,381.50 in refunds on January 16, 1991, and on January 25 of that year submitted copies of the fronts of 105 refund checks totaling $48,748.55 dated January 16 and 17, 1991.

The Commission's finding of reason to believe that the Committee had violated 2 U.S.C. § 441a(f) included the knowing

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acceptance with respect to the general election through the compliance fund of the $48,598.55 which had not been refunded, reattributed or redesignated in a timely fashion. No additional information has been received from the Committee in this regard. Thus, this violation should also be included in a proposed conciliation agreement.

4. From Partnerships

Pursuant to 11 C.F.R. § 110.1(e), contributions from partnerships are to be attributed to the partnership and to each partner. A partnership contribution to a candidate committee may not exceed the $1,000 limitation established at 2 U.S.C. § 441a(a)(1)(A) and at 11 C.F.R. § 110.1(b).

a. P and D Realty Co. and Bertram Associates

As is discussed above, it appears that P and D Realty Co. and Bertram Associates are partnerships, not incorporated entities. Thus, the contributions of $2,000 received from each constituted excessive contributions to the Committee.

b. Obermayer, Rebmann, Maxwell and Hipple

Information supplied during the audit of the Committee indicated that the partnership of Obermayer, Rebmann, Maxwell and Hipple had made a $5,000 contribution to the Committee in February, 1988, and received a $4,000 refund in April, 1988. The firm has more recently stated that it made only one contribution to the Dole committee which was a $1,000 contribution in June, 1987, and has suggested that a typographical error was made which credited the firm with a $5,000 contribution instead. A review of records filed with the Commission has confirmed that one

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contribution from Obermayer in the amount of $1,000 was received by the Dole committee during the 1987-88 election cycle. Therefore, this Office has not included a contribution from Obermayer as one of the excessive contributions to be addressed in the proposed conciliation agreement to be sent to the Committee.

c. Altman Brothers

According to information obtained during the audit, Altman Brothers made a $3,000 contribution to the Committee on December 3, 1987. The Committee refunded $2,000 on June 17, 1988, or 169 days after receipt.

This Office has included this excessive contribution in the attached proposed conciliation agreement.

F. Reporting of Partnership Attribution

The Commission found reason to believe that the Committee had violated 2 U.S.C. § 434(b) by failing to report the attribution of the apparent $5,000 contribution from Obermayer, Rebmann, Maxwell & Hipple to the appropriate partners.

As discussed above, it now appears that Obermayer gave a total of $1,000. Although attribution of this contribution to the partners should have been reported, this Office recommends, in light of the small amounts involved, that the Commission take no further action in this regard as to a violation of 2 U.S.C. § 434(b) by the Committee.

G. Reporting of Delegate Committee Activity

The Commission found reason to believe that the Committee had violated 2 U.S.C. § 434 by failing to report receipts and disbursements of eighteen authorized delegate committees in

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Maryland and Illinois in its consolidated reports. The receipts involved totaled $27,531.83 and the disbursements $42,660.10. As a principal campaign committee, the Committee was required to consolidate in each of its reports the reports submitted to it by any authorized committees. 11 C.F.R. § 104.3(f).

No additional information has been received from the Committee concerning this issue. Therefore, this Office has included a violation of 2 U.S.C. § 434 in this regard in the proposed conciliation agreement.

III. **CONCILIATION**

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III. **RECOMMENDATIONS**

1. Enter into conciliation with the Dole for President Committee and James L. Hagen, as treasurer, prior to a finding of probable cause to believe.

2. Take no further action with regard to a violation of 2 U.S.C. § 434(b) by the Dole for President Committee and James L. Hagen, as treasurer, involving the reporting of the attribution of a partnership contribution from Obermayer, Rebmann, Maxwell & Hipple.

3. Approve the attached proposed conciliation agreement and authorize the appropriate letter.

11/2/92
Date

Lawrence M. Noble
General Counsel

Attachment
Proposed conciliation agreement

9304095526662

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS /DONNA ROACH DR
COMMISSION SECRETARY

DATE: NOVEMBER 5, 1992

SUBJECT: MUR 3309 - GENERAL COUNSEL'S REPORT
DATED NOVEMBER 2, 1992

The above-captioned document was circulated to the Commission on MONDAY, NOVEMBER 2, 1992 4:00 at 4:00 P.M.

Objection(s) have been received from the Commissioner(s) as indicated by the name(s) checked below:

Commissioner Aikens	XXX
Commissioner Elliott	
Commissioner McDonald	
Commissioner McGarry	
Commissioner Potter	
Commissioner Thomas	

This matter will be placed on the meeting agenda for TUESDAY NOVEMBER 10, 1992.

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

9304095266 63

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 3309
Dole for President Committee and James L. Hagen, as treasurer	)	

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on November 10, 1992, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 3309:

1. Enter into conciliation with the Dole for President Committee and James L. Hagen, as treasurer, prior to a finding of probable cause to believe.

2. Take no further action with regard to a violation of 2 U.S.C. § 434(b) by the Dole for President Committee and James L. Hagen, as treasurer, involving the reporting of the attribution of a partnership contribution from Obermayer, Rebmann, Maxwell & Hipple.

(continued)

9304095266 4

3. Approve the proposed conciliation agreement and authorize the appropriate letter as recommended in the General Counsel's report dated November 2, 1992.

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

Attest:

11-10-92
Date

Marjorie W. Emmons
Secretary of the Commission

9304092652665

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 16, 1992

Scott Morgan, Esquire
1618 Inverness Drive
Lawrence, Kansas 66047

RE: MUR 3309
Dole for President Committee
James L. Hagen, as treasurer

Dear Mr. Morgan:

On October 29, 1991, the Federal Election Commission found reason to believe that the Dole for President Committee ("the Committee") and James L. Hagen, as treasurer, violated 2 U.S.C. §§ 434, 441a(b)(1)(A), 441a(f), and 441b, and 26 U.S.C. § 9035(a).

At your request, on November 10, 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. On the same date the Commission also voted to take no further action with regard to a violation of 2 U.S.C. § 434(b) by the Committee and James L. Hagen, as treasurer, involving the reporting of the attribution of a partnership contribution from Obermayer, Rebmann, Maxwell & Hipple.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If your clients 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 me at (202) 219-3400.

Sincerely,

Anne A. Weissenborn
Senior Attorney

Enclosure
Conciliation Agreement

9304095266

AIKEN, ST. LOUIS & SILJEG, P.S.
ATTORNEYS AT LAW
1215 NORTON BUILDING
801 SECOND AVENUE
SEATTLE, WASHINGTON 98104
FACSIMILE: 206-623-5764
TELEPHONE: 206-624-2650

ROBERT ST. LOUIS
CHARLES E. SILJEG
ARTHUR H. McKEAN
GEORGE S. MARTIN
DOUGLAS W. McQUAID
WALLACE E. SKIDMORE, JR.
STEVEN SOHA
WILLIAM A. OLSON
THOMAS J. LUCAS

JAMES R. WOEPPEL
PAMELA A. LANG
R. LIND STAPLEY
GREGORY L. URSICH
KEVIN BEAUCHAMP SMITH

OF COUNSEL
MARTIN J. DURKAN

RETIRED
WALLACE AIKEN

November 10, 1992

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
92 NOV 16 PM 3:43

Mr. Jeffrey D. Long
Federal Election Commission
Washington, DC 20463

Re: MUR 3309
Matthew N. Clapp, Jr.

Dear Mr. Long:

Thank you for your letter of October 30, 1992. The matter has been discussed with our client, Matthew N. Clapp, Jr., and he wishes to enter into the Conciliation Agreement included with your letter.

Enclosed is the Conciliation Agreement executed by Matthew N. Clapp, Jr., along with his check for $750. I would appreciate your having the Agreement signed by Ms. Lerner, and then providing us with a copy.

If anything further is required, please let me know. Thank you for your assistance.

Very truly yours,

AIKEN, ST. LOUIS & SILJEG, P.S.

Thomas J. Lucas

Thomas J. Lucas
Direct Line: 654-1688

TJL:bjd
Enclosure
cc: Mr. M.N. Clapp, Jr. (w/enclosures)

clapma/1110long
5103-0 (001)

RECEIVED
FEDERAL ELECTION
COMMISSION
MAIN COPY ROOM
Nov 13 9 23 AM '92

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93040952668

LAIRD NORTON TRUST CO

Norton Building, Floor 16 • Seattle, WA 98104 • 206 464-5234

NO. 134881

19-02
1250

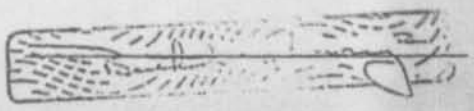
ACCOUNT NUMBER 005200

DATE 11/6/92

AMOUNT SEVEN HUNDRED FIFTY AND NO/100 ******750.00

SEATTLE-FIRST NATIONAL BANK

PAY TO THE ORDER OF FEDERAL ELECTION COMMISSION



AUTHORIZED SIGNATURE

⑈134881⑈ ⑆125000024⑆ 1245 901⑈

Owen & Associates, Inc.

RECEIVED
FEDERAL ELECTION
COMMISSION
MAIN COPY ROOM
Nov 20 10 55 AM '92

David C. Owen, President

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
92 NOV 20 PM 3:36

November 18, 1992

Mr. Lawrence D. Parrish, Attorney
FEDERAL ELECTION COMMISSION
999 E Street, NW
Washington, D.C. 20463

RE: MUR 3309
Owen & Associates, Inc.

Dear Mr. Parrish,

As a follow up to our telephone conversation on Monday, November 16th, I am writing to request an extension in the above matter. The letter from you just arrived as it was addressed to an old street address, and the State was incorrectly shown as New Jersey. I guess it is fortunate that it arrived at all.

In response to the proposed conciliation agreement, I would point out that the deduction of $1,000 by the Dole Campaign of money owed to Owen & Associates was done solely by the Campaign, and I had nothing to do with it. I was also unaware of the reimbursement procedure on the use of the airplane, as that was, again, handled entirely by the Campaign.

The person handling these matters for the Dole Campaign was Scott Morgan, a former member of the Federal Election Commission, and I assumed they were handled properly.

I therefore request that this complaint be rescinded and that no action be taken in this matter.

The address on this letterhead is my new address, and I will await your reply.

Thank you for your consideration.

Sincerely,

David C. Owen

DCO/sw

11011 King Street, Suite 260 • Overland Park, Kansas 66210 • (913) 469-5615 • FAX (913) 469-1662

93040952669

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 8, 1992

David C. Owen
Owen & Associates, Inc.
11011 King Street, Suite 260
Overland Park, Kansas 66210

RE: MUR 3309

Dear Mr. Owen:

This is in response to your letter dated November 18, 1992, which we received on November 20, 1992, requesting an extension to respond to the conciliation agreement. 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 December 16, 1992.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Lawrence D. Parrish

Lawrence D. Parrish
Attorney

93040952670

RECEIVED
FEDERAL ELECTION
COMMISSION
MAIN COPY ROOM
Nov 20 10 56 AM '92

ALTMAN BROTHERS
115 New Street
Glenside, PA 19038

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
92 NOV 20 PM 3:36

November 18, 1992

Lawrence M. Noble, General Counsel
Federal Election Commission
Washington, D.C. 20463

Re: MUR 3309 - Altman Brothers

Dear Mr. Noble:

I am returning herewith a check in the amount of $500.00 together with a signed conciliation agreement.

For the record, however, I would like to state that I still do not understand the determination as made by your staff. As we have explained in the past, Altman Brothers is a partnership of David Altman, Irving Altman, and Berel Altman. We viewed the subject contribution as $1,000.00 from each of us and no one of us made any other contribution to this candidate. Therefore, I cannot understand the logic as to the finding since we certainly did not violate the spirit of the regulations.

I am, however, signing this conciliation agreement and forwarding this check in the interest of closing out this matter which has been hanging for several months.

If you have any further comments, I would appreciate hearing from you.

Very truly yours,

Berel P. Altman

BPA:fpr
Enc.

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
92 NOV 23 PM 3:27

93040952671

ALTMAN BROTHERS
115 NEW STREET
GLENSIDE, PA. 19038

5410

RECEIVED
FEDERAL ELECTION COMMISSION
92 NOV 23 PM 3:21

3-1/310

November 18, 1992

PAY TO THE ORDER OF Federal Election Commission $ 500 00/100

THE SUM $500.00¢ DOLLARS

CoreStates
Philadelphia National Bank

FOR Civil Penalty

"005410" :031000011: 0134044701"

KENNEDY COVINGTON LOBDELL & HICKMAN

ATTORNEYS AT LAW
3300 NATIONSBANK PLAZA
CHARLOTTE, NORTH CAROLINA 28280-8082
TELEPHONE 704/377-6000

SOUTH CAROLINA OFFICE
THE GUARDIAN BUILDING
ONE LAW PLACE-SUITE 300
P. O. BOX 11429
ROCK HILL, S.C. 29731-1429
TELEPHONE 803/327-6171

FACSIMILES
CHARLOTTE 704/331-7598
ROCK HILL 803/324-4737

WRITER'S DIRECT DIAL NUMBER
704/331-7452

MARCUS T. HICKMAN
CLARENCE W. WALKER
JAMES E. (BILL) WALKER
HENRY C. LOMAX
EDGAR LOVE III
CHARLES V. TOMPKINS, JR.
GLEN B. HARDYMON
J. DONNELL LASSITER
ROSS J. SMYTH
A. ZACHARY SMITH III
WILLIAM F. DREW, JR.
CHARLES O. DuBOSE
RALEIGH A. SHOEMAKER
JOHN M. MURCHISON, JR.
STEPHEN M. S. COURTLAND
RICHARD D. STEPHENS
F. FINCHER JARRELL
MAYNARD E. TIPPS
WAYNE P. HUCKEL
J. NORFLEET PRUDEN III
WILLIAM C. LIVINGSTON

LEE WEST MOVIUS
JOSEPH B. C. KLUTTZ
JONATHAN A. BARRETT
EUGENE C. PRIDGEN
STEPHEN K. RHYNE
E. ALLEN PRICHARD
RAYMOND E. OWENS, JR
HENRY W. FLINT
DAVID H. JONES
NANCY BLACK NORELLI
JAMES C. HARDIN III*
PETER McLEAN III
MYLES E. STANDISH
KIRAN H. MEHTA
MICHAEL S. HAWLEY
JAMES P. COONEY III
CAROL NASH NORMAN*
BRIAN P. EVANS
JEFFERSON W. BROWN
LYNN OLIVER WENIGE
GEORGE C. COVINGTON*

DANIEL L. JOHNSON, JR.
WALTER D. FISHER, JR.*
LISA HYMAN LANE*
ALICE CARMICHAEL RICHEY
STEPHEN R. McCRAE, JR.**
DENNARD LINDSEY TEAGUE
DEAN A. WARREN
JOHN H. CULVER III
BOBBY D. HINSON*
W. HENRY SIPE III**
BEVERLY A. CARROLL**
LESLEE K. DAUGHERTY
BRIAN C. REEVE
RANDALL W. LEE
WILLIAM N. HARRIS
ALLISON ROSSER BARNHILL
BARBARA R. FRITH
A. LEE HOGEWOOD III
CORY HOHNBAUM
C. CORLEY HOLT
FELICIA A. WASHINGTON

DAVID W. BROWN, JR.
LAURA E. CUSE**
JAMES E. EARLE
KENNETH L. FREDERICK**
CLIFFORD P. JARRETT
M. PAIGE REECE
CAROL A. JONES VAN BUREN
A. KIMBERLY PALMER

FRANK H. KENNEDY
1893-1975
HUGH L. LOBDELL
1908-1982

OF COUNSEL
W. T. COVINGTON, JR.

SPECIAL COUNSEL
THOMAS P. PAYNE
ROBERT P. CARPENTER**

EXCEPT AS NOTED ATTORNEYS ADMITTED IN N.C. ONLY
*ADMITTED IN N.C. AND S.C.
**ADMITTED IN S.C. ONLY

November 20, 1992

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
92 NOV 23 PM 3:10

Lawrence D. Parrish, Esquire
General Counsel's Office
Federal Election Commission
Washington, D. C. 20463

Re: MUR 3309
Becon Construction Company
Our File No. 06423-007

Dear Mr. Parrish:

Your letter dated October 30, 1992 enclosing proposed conciliation agreement in the above-referenced matter was received by the undersigned on November 2, 1992. We note from your said letter that the period for conciliation negotiations is limited to a period of thirty (30) days from receipt of said letter. As I advised you during our recent telephone conversation, Becon's in-house counsel to whom the undersigned reports is and has been continuously unavailable since receipt of the proposed conciliation agreement.

Therefore, I hereby request an extension of time of twenty (20) days to and including December 22, 1992 within which to conduct conciliation negotiations with the Commission with respect to the above-referenced matter.

Sincerely,

Marcus T. Hickman

Marcus T. Hickman
For the Firm

MTH:el

RECEIVED
FEDERAL ELECTION
COMMISSION
MAIN COPY ROOM
Nov 23 10 20 AM '92

93040952673

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 8, 1992

Marcus T. Hickman, Esq.
Kennedy, Covington, Lobdell & Hickman
3300 Nations Bank Plaza
Charlotte, North Carolina 28280-8082

RE: MUR 3309
Becon Construction Company

Dear Mr. Hickman:

This is in response to your letter dated November 20, 1992, which we received on November 23, 1992, requesting an extension of 20 days to respond to the proposed conciliation agreement. 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 December 22, 1992.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Lawrence D. Parrish
Attorney

9304095267 4

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

ITT HARTFORD

Helle S. Tondro
Counsel

Hartford Plaza
Hartford, CT 06115
Telephone (203) 547-3612

November 20, 1992

Jeffrey D. Long
Paralegal
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: Hartford Insurance Group PAC

Dear Mr. Long:

I am enclosing a copy of the Conciliation Agreement which has been signed on behalf of Hartford Insurance Group PAC by Roger J. Mageau. It is my understanding that you will return a copy of the fully executed agreement to me.

If you have any questions, please contact me at (203) 547-3612.

Very truly yours,

Helle S. Tondro

Helle S. Tondro

cc: H. Katz
R. Mageau

Enclosure

92 NOV 30 PM 4:

RECEIVED
FEDERAL ELECTION
COMMISSION
MAIN COPY ROOM

NOV 27 2 12 PM '92

930409526775

RECEIVED
FEDERAL ELECTION COMMISSION

722

HARTFORD INSURANCE GROUP - P.A.C.
FEDERAL ACCOUNT
HARTFORD PLAZA
HARTFORD, CT 06115

51-65/119 501

92 10 30 PM Nov 19, 19 92

PAY TO THE ORDER OF Federal Election Commission $500.00

Five hundred dollars and 00/100 - - - - - - - DOLLARS

Fleet Bank
Main Office 3416
Hartford, Connecticut 06115

FOR _____

R J Mazzeo

"000722" :011900652: 08-872 932 8"

Geraldine A.
Agency Conn

MassMutual

One Benham Place
9400 North Broadway, Suite 700
Oklahoma City, OK 73114-7493
405 478-5360

November 30, 1992

Mr. Lawrence D. Parrish
Federal Election Commission
Washington, D. C. 20463

Re: MUR 3309
H & W Aviation

Dear Mr. Parrish:

In response to your letter of October 30, enclosed you will find copies of six billings for charter flights that were done before and after the charter flight in question. I will summarize them below:

Charter 22, 12-2-87, hourly rate, $ 757
Charter 23, 12-4-87, hourly rate, $1,087
Charter 24, 12-29-87, hourly rate,$1,200
Charter 25, 2-19-88, hourly rate, $ 887
Charter 26, 3-4-88, hourly rate, $1,017
Charter 27, 3-16-88, hourly rate, $1,150

As you can see from the copies, Charter 26 was to the Dole Committee. Their hourly rate that was ultimately agreed upon and received by us was $1,017. As you can see from the other five charters that were immediately before and after the charter in question, the average hourly rate was $1,016. Our charging the Dole Committee $1,017 per hour was certainly in line with charges made to other clients.

As I have explained in previous correspondence, I have been employed by J. Hawley Wilson, Jr. as an accountant, and in that capacity handled the accounting for H & W Aviation. I have shown Mr. Wilson the Conciliation Agreement. He has instructed me to repeat that we were not aware that any law was being violated

23040952677

We respectfully request that the Commission review the enclosed material. They will, hopefully, agree with us that the charge was certainly in line with the charge made to other charter clients during that time period.

I look forward to a favorable response from you, so that all parties concerned can put the matter behind us. Thank you for your consideration.

Sincerely,

Geraldine Ann Price

Geraldine Ann Price

930409526678

TRIP Charter 22

H & W AVIATION
One Benhar Place, Suite 700
9400 N. Broadway
Oklahoma City, Ok.. 73114
405-478-5360

DATE 12-2-87 CUSTOMER Charter

FROM/TO OKC/Philadelphia/OKC ADDRESS

1.	Flight Time 5.8 hours — Fuel charges(see below)	$ 159.30
2.	Crew Expenses	
	Lodging ____ Meals ____	
	Transportation ____ Tips ____	
	Telephone ____ Other ____	
3.	Ranger, parking	
4.	Landing fees, cleaning, maintenance	
5.	Customs, permits	
6.	Catering, beverages	
7.	Passenger transportation	
8.	Flight planning/Weather services	
9.	Other Pilot commission	203.20
	TOTAL CHARGES	$ 362.50

Revenue 4,390.50
Excess revenue 4,028.00

	used
OKC/Philadelphia	776
Philadelphia/OKC	824
	1,600
charter purchased	1,510
	90 @ 1.77 = 159.30

+757 per hr.

3040952679

TRIP Charter 23

H & W AVIATION
One Benhar Place, Suite 700
9400 N. Broadway
Oklahoma City, Ok. 73114
405-478-5360

DATE 12-4-87 CUSTOMER Charter

FROM/TO OKC/Indianapolis ADDRESS

1. Flight Time 3.6 hours Fuel charges(see below) $ 1,651.95
2. Crew Expenses
   Lodging Meals
   Transportation Tips
   Telephone Other
3. Ranger, parking
4. Landing fees, cleaning, maintenance
5. Customs, permits
6. Catering, beverages
7. Passenger transportation
8. Flight planning/Weather services
9. Other pilot commission 246.24

TOTAL CHARGES $ 1,898.19

Revenue 3,912.00
Excess revenue 2,013.81

	used	bought		to be charged
OKC/Indianapolis	567	600		1,001.70
Indianapolis/OKC	458	425	@ 1.53	650.25
	1,025	1,025		1,651.95

$1087 per hr.

0 9 5 2 6 8 0

2 3 0 4

TRIP Charter 24

H & W AVIATION
One Benhar Place, Suite 700
9400 N. Broadway
Oklahoma City, Ok. 73114
405-478-5360

DATE 12-29-87 CUSTOMER Charter

FROM/TO OKC/Pellston,Mi./OKC ADDRESS

1. Flight Time 4.6 hours Fuel charges(see below) $ 2,168.17
2. Crew Expenses
   Lodging Meals
   Transportation Tips
   Telephone Other
3. Hanger, parking
4. Landing fees, cleaning, maintenance
5. Customs, permits
6. Catering, beverages
7. Passenger transportation
8. Flight planning/Weather services
9. Other - pilot commission 200.00

TOTAL CHARGES $ 2,368.17

Revenue 5,520.00
Excess revenue 3,151.83

	used	bought	to be charged
OKC/Pellston	626	638	1,065.46
Pellston/OKC	635	623 @ 1.77	1,102.71
	1,261	1,261	2,168.17

$1200 per hr.

TRIP Charter 25

H & W AVIATION
One Benhar Place, Suite 700
9400 N. Broadway
Oklahoma City, Ok. 73114
405-478-5360

DATE 2-19-88 CUSTOMER Charter

FROM/TO OKC/San Jose/OKC ADDRESS

1.	Flight Time 6.2 hours — Fuel charges(see below)	$ 3,062.40
2.	Crew Expenses	48.28
	Lodging ____ Meals 33.28	
	Transportation ____ Tips 15.00	
	Telephone ____ Other ____	
3.	Ranger, parking	
4.	Landing fees, cleaning, maintenance	
5.	Customs, permits	
6.	Catering, beverages	
7.	Passenger transportation	
8.	Flight planning/Weather services	
9.	Other Pilot commission	400.00
	TOTAL CHARGES	$ 3,510.68
	Revenue	5,500.00
	Excess revenue	1,989.32

	used	bought	to be charged
OKC/San Jose	876	876 @ 1.76	1,541.76
San Jose/OKC	864	864 @ 1.76	1,520.64
	1,740	1,740	3,062.40

$887. per hr.

XIP Charter 26

H & W AVIATION
One Benham Place, Suite 700
9400 N. Broadway
Oklahoma City, Ok.. 73114
405-478-5360

DATE 3-4-88/3-5-88 CUSTOMER Charter - Dole Campaign

FROM/TO OKC/Wash.D.C./OKC/Tulsa/ ADDRESS

Waterloo, Iowa/Wash.D.C./OKC

1.	Flight Time 11.8 hours — Fuel charges(see below)	$ 6,065.03
2.	Crew Expenses	
	Lodging ____ Meals ____	
	Transportation ____ Tips ____	
	Telephone ____ Other ____	
3.	Ranger, parking	25.00
4.	Landing fees, cleaning, maintenance	34.40
5.	Customs, permits	
6.	Catering, beverages	111.55
7.	Passenger transportation/ telephone	39.69
8.	Flight planning/Weather services	
9.	Other - pilot commissions	800.00

TOTAL CHARGES $ 7,075.67

Revenue 12,000.00
Excess 4,924.33

	used	bought	to be charged
OKC/Wash.D.C.	695	696	1,213.68
Wash.D.C./OKC	907	300 @ 1.76	528.00
OKC/Tulsa	156	600	1,002.00
Tulsa/Waterloo	371	372	589.84
Waterloo/Wash.D.C.	535	695	1,304.15
Wash.D.C./OKC	810	811 @ 1.76	1,427.36
	3,474	3,474	6,065.03

$1017. per hr.

TRIP Charter 27

H & W AVIATION
One Benhar Place, Suite 700
9400 N. Broadway
Oklahoma City, Ok.. 73114
405-478-5360

DATE 3-16-88 CUSTOMER Charter -

FROM/TO OKC/Naples/OKC/Albuquerque/ ADDRESS
Palm Springs/Albuquerque/OKC

1. Flight Time 10.4 hours Fuel charges(see below) $ 5,376.76
2. Crew Expenses
   Lodging Meals
   Transportation Tips
   Telephone Other
3. Ranger, parking
4. Landing fees, cleaning, maintenance
5. Customs, permits
6. Catering, beverages 77.14
7. Passenger transportation
8. Flight planning/Weather services
9. Other

TOTAL CHARGES $ 5,453.90

Revenue 11,960.00
Excess 6,506.10

	used	bought	to be charged
OKC/Naples,Fl.	606	767	1,227.97
Naples/OKC	892	731 @ 1.76	1,286.56
OKC/Albuquerque	410	450	814.34
Albuquerque/Palm Spr.	406	400	777.20
Palm Spr./Albuquerque	385	450	811.33
Albuquerque/OKC	360	261 @ 1.76	459.36
	3,059	3,059	5,376.76

+1150. per hr.

KIRKLAND & ELLIS
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

RECEIVED
FEDERAL ELECTION
COMMISSION
MAIN COPY ROOM
DEC 7 10 50 PM '92

200 East Randolph Drive
Chicago, Illinois 60601

Philip S. Beck
To Call Writer Direct:
312 861-2388

312 861-2000

Facsimile:
312 861-2200

FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
92 DEC -8 PM 3:28

December 1, 1992

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Lawrence D. Parrish, Esq.
Federal Election Commission
Washington, D.C. 20463

Re: MUR ~~3099~~ 3309 - Contran

Dear Mr. Parrish:

Enclosed please find the signed Conciliation Agreement in the above-captioned matter and a check for $1,200. Please return a copy of the signed agreement to me.

Sincerely,

Philip S. Beck

PSB/dec
Encl:

9304095226835

Mutual Disbursement Account

KIRKLAND & ELLIS

200 East Randolph Drive Chicago, Illinois 60601

No. 614206 70-2328 / 719

CONTINENTAL BANK
CHICAGO, ILLINOIS 60697

	Check No.	Date	Amount
Pay $1,200.00	614206	11/30/92	$1,200.00

To the Order Of: FEDERAL ELECTION COMMISSION
WASHINGTON DC 20463

KIRKLAND & ELLIS
Mutual Disbursement Account

Mary Pat Chiel
Elaine D. Shannon

"614206" :071923284: 79-08202"

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92 DEC -7 AM 11:52

BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

In the Matter of)
)
Long Lines Limited) MUR 3309
)
)

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a conciliation agreement which has been signed by D. Jon Winkel, Chief Executive Officer of Long Lines Limited. (Attachment 1.)

The attached agreement contains no changes from the agreement approved by the Commission on September 29, 1992. The nine hundred fifty dollars ($950) civil penalty in this matter has been received. (Attachment 2.)

II. RECOMMENDATIONS

1. Accept the attached conciliation agreement with Long Lines Limited.
2. Close the file with respect to Long Lines Limited.
3. Approve the appropriate letter.

Lawrence M. Noble
General Counsel

12-4-92
Date

BY: _____
Lois G. Lerner
Associate General Counsel

Attachments
1. Conciliation Agreement
2. copy of civil penalty check

Staff Assigned: Lawrence D. Parrish

93040952687

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Long Lines Limited.	)	MUR 3309
	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on December 10, 1992, the Commission decided by a vote of 5-0 to take the following actions in MUR 3309:

1. Accept the conciliation agreement with Long Lines Limited, as recommended in the General Counsel's Report dated December 4, 1992.

2. Close the file with respect to Long Lines Limited.

3. Approve the appropriate letter, as recommended in the General Counsel's Report dated December 4, 1992.

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

Attest:

12-10-92
Date

Marjorie W. Emmons
Secretary of the Commission

Received in the Secretariat: Mon., Dec. 07, 1992 11:52 a.m.
Circulated to the Commission: Mon., Dec. 07, 1992 4:00 p.m.
Deadline for vote: Thurs., Dec. 10, 1992 4:00 p.m.

bjr

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 21, 1992

Jonathan B. Sallet
Jenner & Block
601 Thirteenth Street, N.W.
Twelfth Floor
Washington, D.C. 20005

RE: MUR 3309
Long Lines Limited

Dear Mr. Sallet:

On December 10, 1992, 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. § 441b(a), 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 Long Lines Limited.

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,

Lawrence D. Parrish

Lawrence D. Parrish
Attorney

Enclosure
Conciliation Agreement

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RECEIVED
FEDERAL ELECTION COMMISSION
92 NOV 12 PM 3:05

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 3309
Long Lines Limited	)	
	)	

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 Long Lines Limited ("Respondent") violated 2 U.S.C. § 441b(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. Long Lines Limited is a corporation.

2. According to 2 U.S.C. § 441b(a), it is unlawful for any corporation whatever to make a contribution or expenditure in connection with any federal elections.

3. A candidate, candidate's agent, or person traveling on behalf of a candidate who uses an airplane which is owed or leased by a corporation, other than a corporation licensed to offer commercial services for travel, in connection with a Federal election must, in advance, reimburse the corporation. 11 C.F.R. § 114.9(e). In the case of travel to a city served by regularly scheduled commercial service, the reimbursement must be the first class air fare; in the case of travel to a city not served by a regularly scheduled commercial service, it must be the usual charter rate.

4. A review of the Dole for President Committee (the "DPC") records and reports indicated that from December 23, 1987 through December 24, 1987, the DPC used private aircraft owned by Long Lines Limited for campaign related travel. This review indicated that the DPC made a $3,880.00 payment to Long Lines Limited which was not made in advance as required by 11 C.F.R. § 114.9(e). Long Lines Limited was not licensed at the time to offer commercial services for travel.

V. Respondent's failure to require payment before providin travel on its aircraft constituted a corporate expenditures by the Respondent in violation of 2 U.S.C. § 441b(a).

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VI. 1. Respondent will pay a civil penalty to the Federal Election Commission in the amount of nine hundred fifty dollars ($950.00), pursuant to 2 U.S.C. § 437g(a)(5)(A).

2. Respondent agrees to require advance payment for all travel furnished to candidates for Federal office for campaign travel, pursuant to 11 C.F.R. § 114.9(e).

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 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

2304095269 2

contained in this written agreement shall be enforceable.

FOR THE COMMISSION:

Lawrence M. Noble
General Counsel

BY: _____ _____
Lois G. Lerner Date
Associate General Counsel

FOR THE RESPONDENT:

_____ CEO _____
(Name) Date
(Position)

9304095226933

RECEIVED
F.E.C.
SECRETARIAT
92 DEC 15 PM 4:23

BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

In the Matter of)
)
Contran) MUR 3309
)
)

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a conciliation agreement which has been signed by counsel for Contran, Philip S. Beck. (Attachment 1.)

The attached agreement contains no changes from the agreement approved by the Commission on September 29, 1992. The one thousand two hundred dollar ($1,200.00) civil penalty in this matter has been received. (Attachment 2.)

II. RECOMMENDATIONS

1. Accept the attached conciliation agreement with Contran.
2. Close the file with respect to Contran.
3. Approve the appropriate letter.

Lawrence M. Noble
General Counsel

Date 12/15/92

BY: _____
Lois G. Lerner
Associate General Counsel

Attachments
1. Conciliation Agreement
2. opy of civil penalty check

Staff Assigned: Lawrence D. Parrish

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Contran.	)	MUR 3309
	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on December 21, 1992, the Commission decided by a vote of 5-0 to take the following actions in MUR 3309:

1. Accept the conciliation agreement with Contran, as recommended in the General Counsel's Report dated December 15, 1992.

2. Close the file with respect to Contran.

3. Approve the appropriate letter, as recommended in the General Counsel's Report dated December 15, 1992.

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

Attest:

12-21-92
Date

Delores Hardy for Marjorie W. Emmons
Secretary of the Commission

Received in the Secretariat: Tues., Dec. 15, 1992 4:23 p.m.
Circulated to the Commission: Wed., Dec. 16, 1992 11:00 a.m.
Deadline for vote: Mon., Dec. 21, 1992 4:00 p.m.

bjr

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 6, 1993

Phillip S. Beck, Esq.
Kirkland & Ellis
200 East Randolph Drive
Chicago, IL 60601

RE: MUR 3309
Contran

Dear Mr. Beck:

On December 21, 1992, 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. § 441b(a), 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 Contran.

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,

Lawrence D. Parrish

Lawrence D. Parrish
Attorney

Enclosure
Conciliation Agreement

9304095226996

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 3309
Contran	)	
	)	

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 Contran ("Respondent") violated 2 U.S.C. § 441b(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.

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IV. The pertinent facts in this matter are as follows:

1. Contran is a corporation.

2. According to 2 U.S.C. § 441b(a), it is unlawful for any corporation whatever to make a contribution or expenditure in connection with any federal election.

3. A candidate, candidate's agent, or person traveling on behalf of a candidate who uses an airplane which is owed or leased by a corporation, other than a corporation licensed to offer commercial services for travel, in connection with a Federal election must, in advance, reimburse the corporation. 11 C.F.R. § 114.9(e). In the case of travel to a city served by regularly scheduled commercial service, the reimbursement must be the first class air fare; in the case of travel to a city not served by a regularly scheduled commercial service, it must be the usual charter rate.

4. A review of the Dole for President Committee (the "DPC") records and reports indicated that from January 1988 through March 14, 1988, the DPC used private aircraft owned by Contran for campaign related travel. This review indicated that the DPC made 3 payments (February 3, 1988 payment for $1,662.00, March 24, 1988 payment for $1,571.00 and April 1, 1988 payment for $1,571.00), totaling $4,804.00 to Contran which were not made in advance as required by 11 C.F.R. § 114.9(e). Contran was not licensed at the time to offer commercial services for travel.

V. Respondent's failure to require payments before providing travel on its aircraft constituted a corporate

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contribution by the Respondent in violation of 2 U.S.C. § 441b(a).

VI. 1. Respondent will pay a civil penalty to the Federal Election Commission in the amount of one thousand two hundred dollars ($1,200.00), pursuant to 2 U.S.C. § 437g(a)(5)(A).

2. Respondent agrees to require advance payment for all travel furnished to candidates for Federal office for campaign travel, pursuant to 11 C.F.R. § 114.9(e).

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 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

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contained in this written agreement shall be enforceable.

FOR THE COMMISSION:

Lawrence M. Noble
General Counsel

BY: _____ 1/5/93
Lois G. Lerner — Date
Associate General Counsel

FOR THE RESPONDENT:

Philip S Beck — 12/1/92
(Name) — Date
(Position) (attorney for control)

93040952700

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Becon Construction Company	)	MUR 3309
	)	
	)	

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a conciliation agreement which has been signed by counsel for the Respondent. (See Attachment).

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II. **RECOMMENDATIONS**

1. Accept the attached December 23, 1992 counteroffer from Becon Construction Company.

2. Close the file with respect to Becon Construction Company.

3. Approve the appropriate letter.

Date 1/14/93

Lawrence M. Noble
General Counsel

Attachment

December 23, 1992 Conciliation Agreement

Staff Assigned: Lawrence D. Parrish

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Becon Construction Company.) MUR 3309

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on January 25, 1993, the Commission decided by a vote of 6-0 to take the following actions in MUR 3309:

1. Accept the December 23, 1992 counter-offer from Becon Construction Company, as recommended in the General Counsel's Report dated January 19, 1993.

2. Close the file with respect to Becon Construction Company.

3. Approve the appropriate letter, as recommended in the General Counsel's Report dated January 19, 1993.

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

Attest:

1-25-93
Date

Marjorie W. Emmons
Secretary of the Commission

Received in the Secretariat: Tues., Jan. 19, 1993 1:20 p.m.
Circulated to the Commission: Tues., Jan. 19, 1993 4:00 p.m.
Deadline for vote: Mon., Jan. 25, 1993 4:00 p.m.

dr

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 1, 1993

Marcus T. Hickman
Kennedy, Covington, Lobdell & Hickman
3300 Nationsbank Plaza
Charlotte, NC 28280-8082

RE: MUR 3309
Becon Construction Company

Dear Mr. Hickman:

On January 25, 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. § 441b(a), 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 Becon Construction Company.

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,

Lawrence D. Parrish

Lawrence D. Parrish
Attorney

Enclosure
Conciliation Agreement

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 3309
Becon Construction Company, Inc.	)	
	)	

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 Becon Construction Company, Inc. ("Respondent") violated 2 U.S.C. § 441b(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.

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IV. The pertinent facts in this matter are as follows:

1. Becon Construction Company, Inc. is a corporation.

2. According to 2 U.S.C. § 441b(a), it is unlawful for any corporation whatever to make a contribution or expenditure in connection with any federal election.

3. A candidate, candidate's agent, or person traveling on behalf of a candidate who uses an airplane which is owed or leased by a corporation, other than a corporation licensed to offer commercial services for travel, in connection with a Federal election must, in advance, reimburse the corporation. 11 C.F.R. § 114.9(e). In the case of travel to a city served by regularly scheduled commercial service, the reimbursement must be the first class air fare; in the case of travel to a city not served by a regularly scheduled commercial service, it must be the usual charter rate.

4. A review of the Dole for President Committee's (the "DPC") records and reports indicated that from January 18, 1988 through March 8, 1988, the DPC used private aircraft owned by Becon Construction Company, Inc. ("Becon"), for campaign related travel. This review indicated that the DPC made payments of $7,512.85 and $1,500,00 totaling $9,012.85, to Becon which were not made in advance as required by 11 C.F.R. § 114.9(e). Becon was not licensed at the time to offer commercial services for travel.

5. The DPC's documentation also indicated that Becon rendered $11,487.85 in travel services to the DPC, but DPC only paid

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$9,012.85. The DPC did not offer any documentation which showed that the $2,475.00 difference was paid to Becon.

V. 1. Respondent's $2,475.00 reduction to DPC from the usual and normal charge for the service of its aircraft constituted an in-kind contribution from a corporation in violation of 2 U.S.C. § 441b(a).

2. Respondent's failure to require payments before providing travel on its aircraft constituted a corporate contribution by the Respondent in violation of 2 U.S.C. § 441b(a).

VI. 1. Respondent will pay a civil penalty to the Federal Election Commission in the amount of two thousand eight hundred fifty dollars ($2,850.00), pursuant to 2 U.S.C. § 437g(a)(5)(A).

2. Respondent agrees to require advance payment for all travel furnished to candidates for Federal office for campaign travel, pursuant to 11 C.F.R. § 114.9(e).

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

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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: _____ 1-29-93
Lois G. Lerner
Associate General Counsel
Date

FOR THE RESPONDENT:

_____ December 22, 1992
Marcus T. Hickman
Special Counsel for
Becon Construction Company, Inc.
Date

93U40952708

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Owen & Associates, Inc.	)	MUR 3309
	)	
	)	

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a conciliation agreement which has been signed by David Owen. (See Attachment).

In view of the foregoing and in an effort to conciliate this matter, the Office of the General Counsel recommends that the Commission approve the attached Respondent's December 16, 1992 signed agreement.

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II. **RECOMMENDATIONS**

1. Accept the attached December 16, 1992 counteroffer from Owen & Associates, Inc.

2. Close the file with respect to Owen & Associate, Inc.

3. Approve the appropriate letter.

1/19/93
Date

Lawrence M. Noble
General Counsel

Attachment
December 16, 1992 Conciliation Agreement

Staff Assigned: Lawrence D. Parrish

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Owen & Associates, Inc.) MUR 3309

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on January 25, 1993, the Commission decided by a vote of 6-0 to take the following actions in MUR 3309:

1. Accept the December 16, 1992 counter-offer from Owen & Associates, Inc., as recommended in the General Counsel's Report dated January 19, 1993.

2. Close the file with respect to Owen & Associates, Inc.

3. Approve the appropriate letter, as recommended in the General Counsel's Report dated January 19, 1993.

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

Attest:

1-25-93
Date

Marjorie W. Emmons
Secretary of the Commission

Received in the Secretariat: Tues., Jan. 19, 1993 1:19 p.m.
Circulated to the Commission: Tues., Jan. 19, 1993 4:00 p.m.
Deadline for vote: Mon., Jan. 25, 1993 4:00 p.m.

dr

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 1, 1993

David C. Owen
Owen & Associates, Inc.
11011 King Street, Suite 260
Overland Park, Kansas 66210

RE: MUR 3309
Owen & Associates, Inc.

Dear Mr. Owen:

On January 25, 1993, the Federal Election Commission accepted the signed conciliation agreement submitted in settlement of a violation of 2 U.S.C. § 441b(a), 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 Owen & Associates, Inc.

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,

Lawrence D. Parrish

Lawrence D. Parrish
Attorney

Enclosure
Conciliation Agreement

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 3309
Owen and Associates	)	
	)	

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 Owen and Associates ("Respondent") violated 2 U.S.C. § 441b(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.

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IV. The pertinent facts in this matter are as follows:

1. Owen and Associates is a corporation.

2. According to 2 U.S.C. § 441b(a), it is unlawful for any corporation whatever to make a contribution or expenditure in connection with any federal election.

3. A candidate, candidate's agent, or person traveling on behalf of a candidate who uses an airplane which is owed or leased by a corporation, other than a corporation licensed to offer commercial services for travel, in connection with a Federal election must, in advance, reimburse the corporation. 11 C.F.R. § 114.9(e). In the case of travel to a city served by regularly scheduled commercial service, the reimbursement must be the first class air fare; in the case of travel to a city not served by a regularly scheduled commercial service, it must be the usual charter rate.

4. A review of the Dole for President Committee's (the "DPC") vendor records indicated that the DPC made a total reimbursement of $9,905.00 to Owen and Associates for use of a private airplane. This amount was $1,000 less than the usual and normal charge for the service of the airplane. The charter rate for the aircraft was $150.00 per hour and the DPC used 72.7 hours. Therefore the actual total due for the use of the aircraft was $10,905 ($150.00 X 72.7 hours = $10,905).

5. Furthermore, DPC's payments to Owen and Associates, totaling $9,905.00, were not made in advance as required by 11 C.F.R. § 114.9(e). Owen and Associates is not licensed to

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offer commercial services for travel.

V. 1. Respondent's $1,000.00 reduction to DPC from the usual and normal charge for the service of its aircraft constituted an in-kind contribution from a corporation in violation of 2 U.S.C. § 441b(a).

2. Respondent's failure to require payments before providing travel on its aircraft constituted a corporate contribution by the Respondent in violation of 2 U.S.C. § 441b(a).

VI. 1. Respondent will pay a civil penalty to the Federal Election Commission in the amount of two thousand and no/100--------- dollars ($2,000.00), pursuant to 2 U.S.C. § 437g(a)(5)(A).

2. Respondent agrees to require advance payment for all travel furnished to candidates for Federal office for campaign travel, pursuant to 11 C.F.R. § 114.9(e).

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

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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: _____ 1/29/93
Lois G. Lerner
Associate General Counsel
Date

FOR THE RESPONDENT:

Owen & Associates, INC.
David B. Owen, President
(Name)
(Position)

12-14-92
Date

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SCOTT E. MORGAN
1618 Inverness Drive
Lawrence, Kansas 66047
(913) 842-6268
FAX (913) 841-3534

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
93 MAR -1 AM 10:45

February 23, 1993

Ms. Anne A. Weissenborn
Federal Election Commission
Office of the General Counsel
999 E Street, NW
Washington, DC 20463

MUR
3309

Dear Anne:

Pursuant to our recent phone conversation, I am formally requesting a two week extension for my response to your proposed Conciliation Agreement.

As I mentioned in our conversation, this is a particularly busy time of year in my publishing business. I have a book due at the printer next Monday. I realize this has all the makings of a personal problem but any consideration that can be given will be appreciated.

I look forward to all of this being behind us. Thank you for your assistance.

Sincerely,

Scott E. Morgan

93040952717

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

March 3, 1993

Scott E. Morgan, Esquire
1618 Inverness Drive
Lawrence, Kansas 66047

RE: MUR 3309
Dole for President Committee
James L. Hagen, as treasurer

Dear Mr. Morgan:

This is in response to your letter dated February 23, 1993, which we received on March 1, 1993, requesting an extension of two weeks to respond to the proposed conciliation agreement in the above-cited matter. After considering the circumstances presented in your letter, the Office of the General Counsel has granted the requested extension. Accordingly, the requested two week period will be deemed to have begun on the date of your letter, and thus your response will be due by the close of business on March 9, 1993.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Anne A. Weissenborn

Anne A. Weissenborn
Senior Attorney

9304095718

KENNEDY COVINGTON LOBDELL & HICKMAN
ATTORNEYS AT LAW

NationsBank Corporate Center
Suite 4200
100 North Tryon Street
Charlotte, North Carolina 28202-4006

Marcus T. Hickman
704/331-7452

Telephone 704/331-7400
Facsimile 704/331-7598

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March 1, 1993

Lawrence D. Parrish, Esquire
General Counsel's Office
Federal Election Commission
Washington, D. C. 20463

Re: Federal Election Commission - Becon Construction Company - MUR 3309
Our File No. 06423-007

Dear Mr. Parrish:

Pursuant to the Conciliation Agreement executed on behalf of the Federal Election Commission on January 29, 1993, in the above-referenced matter, and forwarded to the undersigned by your letter of February 1, 1993, I am enclosing herewith check of Becon Construction Company dated February 19, 1993, in the amount of $2,850.00 payable to the Federal Election Commission in payment of the civil penalty provided for by said Conciliation Agreement.

It is my understanding that this matter is now concluded.

Sincerely,

Marcus T. Hickman
For the Firm

MTH:el
Enclosure

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BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

In the Matter of	)	
	)	MUR 3309
Altman Brothers	)	
Matthew Clapp	)	
Lydia Fried	)	
John King	)	
	)	
Hartford Insurance Group PAC and	)	
Robert J. Mageau, as treasurer	)	
	)	
Tele-Com., Inc. PAC and Gary	)	
K. Bracken, as treasurer	)	

GENERAL COUNSEL'S REPORT

2304095270

I. BACKGROUND

As a result of the audit of the Dole for President Committee, the Federal Election Commission found reason to believe that six political action committees and 23 individuals made excessive contributions to the Dole Committee. On September 29, 1992, the Commission voted to enter into conciliation with two of the political action committees and five of the individual respondents with regard to their violations. Attached are six signed conciliation agreements (four individuals and two political action committees).[1] The attached agreements contain no changes from the agreements approved by the Commission on September 29, 1992. Checks for the respective civil penalties have been received. The Office of the General Counsel recommends

---

1. Mr. John Hamilton is the one remaining individual respondent still in conciliation discussion with this Office for his excessive contribution to the Dole Committee. A report will be prepared when the negotiations with Mr. Hamilton are concluded.

that the Commission accept the attached signed conciliation agreements and close the file with respect to those respondents.

II. **RECOMMENDATIONS**

1. Accept the attached conciliation agreement with:

   a. Altman Brothers
   b. Matthew Clapp
   c. Lydia Fried
   d. John King
   e. Hartford Insurance Group PAC and Gary K. Bracken, as treasurer
   f. Tele-Com., Inc. PAC and Robert J. Mageau, as treasurer

2. Close the file as to the above respondents.

3. Approve the appropriate letters.

Lawrence M. Noble
General Counsel

4/17/93
Date

BY: _____
Lois G. Lerner
Associate General Counsel

Attachment
Conciliation Agreements (6)

Staff Assigned: Jeffrey Long

23040952721

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Altman Brothers;
Mathew Clapp;
Lydia Fried;
John King;
Hartford Insurance Group PAC and
Robert J. Mageau, as treasurer;
Tele-Com., Inc. PAC and Gary K. Bracken,
as treasurer.

MUR 3309

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CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on April 22, 1993, the Commission decided by a vote of 6-0 to take the following actions in MUR 3309:

1. Accept the conciliation agreement with:

   a. Altman Brothers;
   b. Mathew Clapp;
   c. Lydia Fried;
   d. John King;
   e. Hartford Insurance Group PAC and Gary K. Bracken, as treasurer;
   f. Tele-Com., Inc. PAC and Robert J. Mageau, as treasurer.

(Continued)

2. Close the file as to the above respondents.

3. Approve the appropriate letters, as recommended in the General Counsel's Report dated April 17, 1993.

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

Attest:

4-22-93
Date

Marjorie W. Emmons
Secretary of the Commission

Received in the Secretariat: Mon., April 19, 1993 2:47 p.m.
Circulated to the Commission Mon., April 19, 1993 4:00 p.m.
Deadline for vote: Thurs., April 22, 1993 4:00 p.m.

dr

9304095227 23

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MAY 4, 1993

Joe Lewandowski
Altman Brothers
115 New Street
Glenside, PA 19038

RE: MUR 3309
Altman Brothers

Dear Mr. Lewandowski:

On April 22, 1993, the Federal Election Commission accepted the signed conciliation agreement submitted on your behalf in settlement of a violation of 2 U.S.C. § 441a(a)(1)(A), 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 Altman Brothers.

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,

Jeffrey D. Long

Jeffrey D. Long
Paralegal

Enclosure
Conciliation Agreement

9304095272 4

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Altman Brothers) MUR 3309
)
)

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 Altman Brothers ("Respondent"), violated 2 U.S.C. § 441a(a)(1)(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. Altman Brothers is a partnership and is a person within the meaning of 2 U.S.C. § 431(11).

2. No person shall make contributions to any candidate with respect to any election for Federal office which, in the aggregate, exceed $1,000.00. 2 U.S.C. § 441a(a)(1)(A).

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3. The limitations apply separately for each election, except that all elections held in any calendar year for office of President of the United States (except a general election for such office) shall be considered to be one election. 2 U.S.C. § 441a(a)(6).

4. Contributions which exceed the limitations may be deposited into a campaign depository. If any such contributions are so deposited, the treasurer of the recipient committee may request redesignation or reattribution of the contribution by the contributor in accordance with Commission regulations. If a redesignation or reattribution is not obtained, the treasurer shall, within 60 days of the treasurer's receipt of the contribution, refund the contribution to the contributor. 11 C.F.R. § 103.3(b)(3).

V. Respondent made contributions totaling $3,000 to the Dole for President Committee (the excessive amount of which was not redesignated to another election, reattributed to another person, or refunded within 60 days of their receipt by the Dole for President Committee) and thus made an excessive contribution in violation of 2 U.S.C. § 441a(a)(1)(A).

VI. Respondent will pay a civil penalty to the Federal Election Commission in the amount of five hundred dollars ($500.00), 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

9304095527 26

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 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: _____ 5-3-93
Lois G. Lerner
Associate General Counsel
Date

FOR THE RESPONDENTS:

_____ 11-18-92
(Name)
(Position)
Date

93040955727

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MAY 4, 1993

Thomas J. Lucas, Esq.
Aiken, St. Louis & Siljeg, P.S.
215 Norton Building
801 Second Avenue
Seattle, Washington 98104

RE: MUR 3309
Matthew N. Clapp, Jr.

Dear Mr. Lucas:

On April 22, 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), 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 Matthew N. Clapp, Jr.

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,

Jeffrey D. Long

Jeffrey D. Long
Paralegal

Enclosure
Conciliation Agreement

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Matthew N. Clapp, Jr.) MUR 3309
)
)

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 Matthew N. Clapp, Jr. ("Respondent"), violated 2 U.S.C. § 441a(a)(1)(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. Matthew N. Clapp, Jr. is a person within the meaning of 2 U.S.C. § 431(11).

2. No person shall make contributions to any candidate with respect to any election for Federal office which, in the aggregate, exceed $1,000.00. 2 U.S.C. § 441a(a)(1)(A).

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3. The limitations apply separately for each election, except that all elections held in any calendar year for office of President of the United States (except a general election for such office) shall be considered to be one election. 2 U.S.C. § 441a(a)(6).

4. Contributions which exceed the limitations may be deposited into a campaign depository. If any such contributions are so deposited, the treasurer of the recipient committee may request redesignation or reattribution of the contribution by the contributor in accordance with Commission regulations. If a redesignation or reattribution is not obtained, the treasurer shall, within 60 days of the treasurer's receipt of the contribution, refund the contribution to the contributor. 11 C.F.R. § 103.3(b)(3).

V. Respondent made contributions totaling $5,000.00 to the Dole for President Committee (the excessive amount of which was not redesignated to another election, reattributed to another person, or refunded within 60 days of receipt by the Dole for President Committee) and thus made an excessive contribution in violation of 2 U.S.C. § 441a(a)(1)(A).

VI. Respondent will pay a civil penalty to the Federal Election Commission in the amount of seven hundred and fifty dollars ($750.00), 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

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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 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: _____ Date 5/4/93
Lois G. Lerner
Associate General Counsel

FOR THE RESPONDENTS:

Matthew N. Clagg Jr. _____ Nov. 6, 1992
(Name) Date
(Position)

93040952731

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MAY 4, 1993

Lydia Fried
9123 Town Gate Lane
Bethesda, MD 20817

RE: MUR 3309
Lydia Fried

Dear Ms. Fried:

On April 22, 1993, the Federal Election Commission accepted the signed conciliation agreement submitted on your behalf in settlement of a violation of 2 U.S.C.§ 441a(a)(1)(A), 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 you.

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,

Jeffrey D. Long
Paralegal

Enclosure
Conciliation Agreement

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OFFICE OF GENERAL COUNSEL
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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 3309
Lydia Fried)
)

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 Lydia Fried ("Respondent"), violated 2 U.S.C. § 441a(a)(1)(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. Lydia Fried is a person within the meaning of 2 U.S.C. § 431(11).

2. No person shall make contributions to any candidate with respect to any election for Federal office which, in the aggregate, exceed $1,000.00. 2 U.S.C. § 441a(a)(1)(A).

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3. The limitations apply separately for each election, except that all elections held in any calendar year for office of President of the United States (except a general election for such office) shall be considered to be one election. 2 U.S.C. § 441a(a)(6).

4. Contributions which exceed the limitations may be deposited into a campaign depository. If any such contributions are so deposited, the treasurer of the recipient committee may request redesignation or reattribution of the contribution by the contributor in accordance with Commission regulations. If a redesignation or reattribution is not obtained, the treasurer shall, within 60 days of the treasurer's receipt of the contribution, refund the contribution to the contributor. 11 C.F.R. § 103.3(b)(3).

5. Contributions made by more than one person, except for a contribution made by a partnership, shall include the signature of each contributor on the check, money order, or other negotiable instrument or in a separate writing. A contribution made by more than one person that does not indicate the amount to be attributed to each contributor shall be attributed equally to each contributor. 11 C.F.R. § 110.1(k)(2).

6. A contribution shall be considered to be reattributed to another contributor if the treasurer of the recipient committee asks the contributor whether the contribution is intended to be a joint contribution by more than one person and informs the contributor that he or she may request the return of the excessive portion of the contribution if it is not intended to be a joint

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contribution and, within sixty (60) days from the date of the treasurer's receipt of the contribution, the contributors provide the treasurer with a written reattribution of the contribution, which is signed by each contributor and which indicates the amount to be attributed to each contributor if equal attribution is not intended. 11 C.F.R. § 110.1(k)(3).

V. Respondent made contributions totaling $3,000.00 to the Dole for President Committee (the excessive amount of which was not redesignated to another election, reattributed to another person, or refunded within 60 days of their receipt by the Dole for President Committee) and thus made an excessive contribution in violation of 2 U.S.C. § 441a(a)(1)(A).

VI. Respondent will pay a civil penalty to the Federal Election Commission in the amount of five hundred dollars ($500.00), 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

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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: _____ 5-4-93
Lois G. Lerner
Associate General Counsel
Date

FOR THE RESPONDENTS:

Lydia Guid 11-3-92
(Name)
(Position)
Date

2304095527336

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MAY 4, 1993

John W. King
31 Buckingham Road
Norwood, MA 02062

RE: MUR 3309
John W. King

Dear Mr. King:

On April 22, 1993, the Federal Election Commission accepted the signed conciliation agreement submitted on your behalf in settlement of a violation of 2 U.S.C. § 441a(a)(1)(A), 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 you.

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,

Jeffrey D. Long

Jeffrey D. Long
Paralegal

Enclosure
Conciliation Agreement

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COMMISSION
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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

John W. King) MUR 3309
)
)

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OFFICE OF GENERAL COUNSEL
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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 John W. King ("Respondent"), violated 2 U.S.C. § 441a(a)(1)(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. John W. King is a person within the meaning of 2 U.S.C. § 431(11).

2. No person shall make contributions to any candidate with respect to any election for Federal office which, in the aggregate, exceed $1,000.00. 2 U.S.C. § 441a(a)(1)(A).

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3. The limitations apply separately for each election, except that all elections held in any calendar year for office of President of the United States (except a general election for such office) shall be considered to be one election. 2 U.S.C. § 441a(a)(6).

4. Contributions which exceed the limitations may be deposited into a campaign depository. If any such contributions are so deposited, the treasurer of the recipient committee may request redesignation or reattribution of the contribution by the contributor in accordance with Commission regulations. If a redesignation or reattribution is not obtained, the treasurer shall, within 60 days of the treasurer's receipt of the contribution, refund the contribution to the contributor. 11 C.F.R. § 103.3(b)(3).

V. Respondent made contributions totaling $2,500 to the Dole for President Committee (the excessive amount of which was not redesignated to another election, reattributed to another person, or refunded within 60 days of their receipt by the Dole for President Committee) and thus made an excessive contribution in violation of 2 U.S.C. § 441a(a)(1)(A).

VI. Respondent will pay a civil penalty to the Federal Election Commission in the amount of three hundred seventy-five dollars ($375.00), 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

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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 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: _____ 5-4-93
Lois G. Lerner
Associate General Counsel
Date

FOR THE RESPONDENTS:

John W King
(Name)
(Position)

11/4/92
Date

93040952740

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MAY 4, 1993

Helle S. Tondro, Esq.
ITT Hartford
Hartford Plaza
Hartford, CT 06115

RE: MUR 3309
Hartford Insurance Group PAC
and Roger J. Mageau, as
treasurer

Dear Counsel:

On April 22, 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)(2)(A), 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 Hartford Insurance Group PAC and Roger J. Mageu, as treasurer.

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,

Jeffrey D. Long

Jeffrey D. Long
Paralegal

Enclosure
Conciliation Agreement

2304095274 1

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Hartford Insurance Group PAC and Roger J. Mageau, as treasurer	)	MUR 3309

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE
92 NOV 30 PM 2:26

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 Hartford Insurance Group PAC and Roger J. Mageau, as treasurer ("Respondents"), violated 2 U.S.C. § 441a(a)(2)(A).

NOW, THEREFORE, the Commission and the Respondents, 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 Respondents 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. 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. Hartford Insurance Group PAC is a political committee within the meaning of 2 U.S.C. § 431(4).

2. Roger J. Mageau is the treasurer of Hartford Insurance Group PAC.

2304095277 42

3. No multicandidate political committee shall make contributions to any candidate and his authorized political committees with respect to any election for Federal office which, in the aggregate, exceed $5,000.00. 2 U.S.C. § 441a(a)(2)(A). These limitations apply separately to each election, except that all elections held in any calendar year for the office of President of the United States (except a general election for such office) shall be considered to be one election. 2 U.S.C. § 441a(a)(6).

4. Contributions which exceed the limitations may be deposited into a campaign depository. If any such contributions are so deposited, the treasurer of the recipient committee may request redesignation or reattribution of the contribution by the contributor in accordance with Commission regulations. If a redesignation or reattribution is not obtained, the treasurer shall, within 60 days of the treasurer's receipt of the contribution, refund the contribution to the contributor. 11 C.F.R. § 103.3(b)(3).

5. The Respondents made a $2,000 contribution to the Dole for President Committee on September 3, 1987, and a $5,000 contribution to the Dole for President Committee on February 22, 1988. Respondents received a refund of the excessive amount ($2,000) on May 30, 1988, which was not within the prescribed time limits as set forth in the Federal Election Campaign Act of 1971, as amended.

2304095743

V. Respondents made an excessive contribution totaling $2,000 to the Dole for President Committee in violation of 2 U.S.C. § 441a(a)(2)(A).

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of five hundred dollars ($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. Respondents shall have no more than 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.

9304095274

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: _____ 5-4-93
Lois G. Lerner
Associate General Counsel
Date

FOR THE RESPONDENTS:

R. J. Mazzeo 11/19/92
(Name)
(Position) Treasurer
Date

93040952745

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MAY 4, 1993

Colin R. Stoner, Assistant Treasurer
Tele-Com., Inc. PAC
P.O. Box 5630
Denver, Colorado 80217

RE: MUR 3309
Tele-Com., Inc. PAC and
Gary K. Braken, as treasurer

Dear Mr. Stoner:

On April 22, 1993, the Federal Election Commission accepted the signed conciliation agreement submitted on your behalf in settlement of a violation of 2 U.S.C. § 441a(a)(1)(A), 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 Tele-Com., Inc. PAC and Gary K. Braken, as treasurer.

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,

Jeffrey D. Long

Jeffrey D. Long
Paralegal

Enclosure
Conciliation Agreement

73040952746

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Tele-Communications, Inc. PAC and Gary K. Bracken, as treasurer	)	MUR 3309

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 Tele-Communications, Inc. PAC and Gary K. Bracken, as treasurer ("Respondents"), violated 2 U.S.C. § 441a(a)(1)(A).

NOW, THEREFORE, the Commission and the Respondents, 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 Respondents 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. 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. Tele-Communications, Inc. PAC is a political committee within the meaning of 2 U.S.C. § 431(4).

2. Gary K. Bracken is the treasurer of Tele-Communications, Inc. PAC.

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3. No person shall make contributions to any candidate with respect to any election for Federal office which, in the aggregate, exceed $1,000.00. 2 U.S.C. § 441a(a)(1)(A). For purposes of the Act's limitations on contributions and expenditures, the term "person" includes a political committee that has not qualified as a multicandidate political committee.

4. A multicandidate political committee may make contributions up to $5,000 to an authorized political committee. 2 U.S.C. § 441a(a)(2)(A). The term "multicandidate committee" means a political committee which has been registered under section 433 for a period of not less than 6 months, which has received contributions from more than 50 persons, and has made contributions to five or more federal candidates. 2 U.S.C. § 441a(4).

5. These limitations apply separately for each election, except that all elections held in any calendar year for office of President of the United States (except a general election for such office) shall be considered to be one election. 2 U.S.C. § 441a(a)(6).

6. Contributions which exceed the limitations may be deposited into a campaign depository. If any such contributions are so deposited, the treasurer of the recipient committee may request redesignation or reattribution of the contribution by the contributor in accordance with Commission regulations. If a redesignation or reattribution is not obtained, the treasurer shall, within 60 days of the treasurer's receipt of the

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contribution, refund the contribution to the contributor. 11 C.F.R. § 103.3(b)(3).

7. Respondents made a $2,000 contribution to the Dole for President Committee on November 24, 1987, then requested and received a $1,000 refund on March 3, 1988. Respondents subsequently made a contribution of $1,000 to the Dole for President Committee on March 29, 1988.

V. Respondents made an excessive contribution to the Dole for President Committee in violation of 2 U.S.C. § 441a(a)(1)(A).

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of seven hundred and fifty dollars ($750), 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. Respondents shall have no more than 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.

2304095749

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
Associate General Counsel

Date 5/4/93

FOR THE RESPONDENTS:

_____ _____
(Name) Colin R. Stoner
(Position) Assistant Treasurer

Date 11/19/92

93040952750

OGC 9035

RECEIVED
FEDERAL ELECTION COMMISSION

93 JUN 10 PM 12:00

OLDAKER, RYAN & LEONARD
ATTORNEYS AT LAW
818 CONNECTICUT AVENUE, N.W., SUITE 1100
WASHINGTON, D.C. 20006

[202] 728-1010
FACSIMILE: [202] 728-4044

June 10, 1993

- HAND DELIVERED -

Lawrence D. Parrish
General Counsel's Office
Federal Election Commission
999 E Street, N.W.
Suite 657
Washington, DC 20463

Dear Mr. Parrish:

Enclosed please find the signed Conciliation Agreement as we discussed for the Commission's approval. If you have any questions or comments, please contact me at (202) 728-1010.

Sincerely,

Lyn Utrecht

Lyn Utrecht

Enclosures

9304095275 1

RECEIVED
F.E.C.
SECRETARIAT
93 JUN 23 AM 10:50

BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

In the Matter of)
)
H & W Aviation)
Browning-Ferris Industries) MUR 3309
)
)

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On October 29, 1991, the Commission found reason to believe that nine corporations violated 2 U.S.C. § 441b by making contributions to the Dole for President Committee (the "Dole Committee"). On September 29, 1992, the Commission determined to enter into negotiations with the above-mentioned Respondents, directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe. (See General Counsel's Report, dated September 21, 1992.) These two Respondents are the only remaining corporate Respondents in this matter.

H & W AVIATION

On November 30, 1992, this Office received a letter from Ms. Geraldine Price, responding on behalf of H & W Aviation ("H & W"), requesting that no civil penalty be assessed in this matter. (See Attachment 1). Ms. Price is employed by H & W as an accountant, and was the person who handled the accounting for H & W's charters. Ms. Price asserts that the amount charged to the Dole Committee for use of its aircraft "was certainly in line with charges made to other clients."

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Ms. Price has enclosed, along with H & W's response, copies of the charter flight invoices for the four charters before and one charter after the Dole Committee's charter. The following is a list of these charters:

Charter 22, 12-02-87, hourly rate, $ 757
Charter 23, 12-04-87, hourly rate, $1,087
Charter 24, 12-29-87, hourly rate, $1,200
Charter 25, 02-19-88, hourly rate, $ 887
Charter 26, 03-04-88, hourly rate, $1,017[1]
Charter 27, 03-16-88, hourly rate, $1,150

The calculated average hourly rate of the above charters is $1,016. The hourly rate charged to the Dole Committee for its March 4, 1988 charter was $1,017.

Although H & W agreed to reduce the Dole Committee's original quoted charter amount by $2,750, in an effort to collect as much as possible, it appears that the amount agreed upon still fell within the standard fare charged by H & W to other individuals which chartered its aircraft during that same time period.[2]

Based upon the foregoing, this Office recommends that the Commission take no further action in this matter and close the file as it pertains to H & W Aviation.

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1. Charter 26 is the charter for the Dole for President Committee.

2. There was a dispute between H & W and the Dole Committee about the amount charged for the charter. The original amount quoted was $14,750. In an attempt to resolve this dispute, H & W reduced the amount of the charter by $2,750. The actual amount paid by the Dole Committee for the charter was $12,000.

BROWNING-FERRIS INDUSTRIES

Attached is a conciliation agreement which has been signed by counsel for Browning-Ferris Industries ("BFI"). (See Attachment 2).

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II. RECOMMENDATIONS

1. Accept the attached June 10, 1993 counteroffer from Browning-Ferris Industries.

2. Close the file with respect to Browning-Ferris Industries.

3. Take no further action against H & W Aviation.

4. Close the file with respect to H & W Aviation.

5. Approve the appropriate letters.

Lawrence M. Noble
General Counsel

June 22, 1993
Date

BY: Lois G. Lerner (sec)
Lois G. Lerner
Associate General Counsel

Attachment

1. H & W December 7, 1992 letter
2. BFI December 7, 1992 letter
3. BFI June 10, 1993 letter

Staff Assigned: Lawrence D. Parrish

93040952756

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
H & W Aviation;	)	MUR 3309
Browning-Ferris Industries.	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on June 28, 1993, the Commission decided by a vote of 6-0 to take the following actions in MUR 3309:

1. Accept the June 10, 1993 counteroffer from Browning-Ferris Industries, as recommended in the General Counsel's Report dated June 22, 1993.

2. Close the file with respect to Browning-Ferris Industries.

3. Take no further action against H & W Aviation.

4. Close the file with respect to H & W Aviation.

(continued)

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5. Approve the appropriate letters, as recommended in the General Counsel's Report dated June 22, 1993.

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

Attest:

6-28-93
Date

Marjorie W. Emmons
Secretary of the Commission

Received in the Secretariat: Wed., June 23, 1993 10:50 a.m.
Circulated to the Commission: Wed., June 23, 1993 11:00 a.m.
Deadline for vote: Mon., June 28, 1993 4:00 p.m.

bjr

9304095275 8

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

JULY 7, 1993

Lyn Utrecht, Esq.
Oldaker, Ryan & Leonard
818 Connecticut Avenue, NW, Suite 1000
Washington, D.C. 20006

RE: MUR 3309

Dear Ms. Utrecht:

On June 28, 1993, the Federal Election Commission accepted the signed conciliation agreement submitted on your client's behalf in settlement of a violation of U.S.C. § 2 U.S.C. § 441b(a), 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 Browning-Ferris Industries.

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,

Lawrence D. Parrish

Lawrence D. Parrish
Attorney

Enclosure
Conciliation Agreement

2304095275759

RECEIVED
FEDERAL ELECTION COMMISSION
93 JUN 10 PM 12: 00

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 3309
Browning-Ferris Industries	)	
	)	

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 Browning-Ferris Industries ("Respondent") violated 2 U.S.C. § 441b(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. Browning-Ferris Industries is a corporation.

2. According to 2 U.S.C. § 441b(a), it is unlawful for any corporation whatever to make a contribution or expenditure in connection with any federal elections.

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3. A candidate, candidate's agent, or person traveling on behalf of a candidate who uses an airplane which is owed or leased by a corporation, other than a corporation licensed to offer commercial services for travel, in connection with a Federal election must, in advance, reimburse the corporation. 11 C.F.R. § 114.9(e). In the case of travel to a city served by regularly scheduled commercial service, the reimbursement must be the first class air fare; in the case of travel to a city not served by a regularly scheduled commercial service, it must be the usual charter rate.

4. A review of the Dole for President Committee (the "DPC") records and reports indicated that from May 1, 1987 through November 18, 1987, the DPC used private aircraft owned by Browning-Ferris Industries for campaign related travel. This review indicated that the DPC made 2 payments (November 20, 1987 payment for $2,414.00 and March 15, 1988 payment for $1,254.00), totaling $3,668.00 to Browning-Ferris Industries which were not made in advance as required by 11 C.F.R. § 114.9(e). Browning-Ferris Industries was not licensed at the time to offer commercial services for travel.

V. BFI requested payment from the Dole Committee in advance of the use of the airplane, and reviewed each trip to insure that full payment was received. In only two instances payment was inadvertently made after the date of travel. In both instances BFI claims that it was unclear at the time of the trip whether the trip was campaign-related, and in both instances, reimbursement was made within a few days of the travel.

VI. Respondent's failure to require payments before providing travel on its aircraft constituted a corporate contribution by the Respondent in violation of 2 U.S.C. § 441b(a).

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VII. 1. Respondent will pay a civil penalty to the Federal Election Commission in the amount of six hundred dollars ($600.00), pursuant to 2 U.S.C. § 437g(a)(5)(A).

2. Respondent agrees to require advance payment for all travel furnished to candidates for Federal office for campaign travel, pursuant to 11 C.F.R. § 114.9(e).

VIII. 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.

IX. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

X. Respondent shall have no more than 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.

XI. 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.

2304095276 2

FOR THE COMMISSION:

Lawrence M. Noble
General Counsel

BY: _____ 11/7/93
Lois G. Lerner Date
Associate General Counsel

FOR THE RESPONDENT:

_____ 6/4/93
Lyn Utrecht Date
Oldaker, Ryan & Leonard
Attorney for Browning-
Ferris Industries

9304095276 63

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

JULY 7, 1993

Geraldine A. Price
MassMutual
One Benham Place
9400 North Broadway, Suite 700
Oklahoma City, OK 73114-7493

RE: MUR 3309
H & W Aviation

Dear Ms. Price:

On October 29, 1991, you were notified that the Federal Election Commission found reason to believe that H & W Aviation violated 2 U.S.C. § 441b.

After considering the circumstances of the matter, the Commission determined on June 28, 1993, to take no further action against H & W Aviation, and closed the file as it pertains to H & W Aviation. The file will be made public within 30 days after this matter has been closed with respect to all other respondents involved.

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.

The Commission reminds you that discounting the hourly rate for the Dole Committee Charter appears to be a violation of 2 U.S.C. § 441b. H & W Aviation should take immediate steps to insure that this activity does not occur in the future.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Lawrence D. Parrish

Lawrence D. Parrish
Attorney

93040952764

RECEIVED
FEDERAL ELECTION
COMMISSION
MAIL ROOM

Owen &
Associates, Inc.

JUL 12 10 51 AM '93

David C. Owen, President

RECEIVED
FEDERAL ELECTION COMMISSION
93 JUL 13 AM 11:05

93040952765

July 1, 1993

Lawrence D. Parrish, Esq.
FEDERAL ELECTION COMMISSION
999 E. Street NW
Washington, D.C. 20463

RE: MUR 3309

Dear Mr. Parrish,

In response to our telephone conversation, please find enclosed our check in the amount of $2,000 as full settlement of the above matter.

Thank you for your assistance.

Sincerely,

David C. Owen

DCO/sw

Encl.

11011 King Street, Suite 260 • Overland Park, Kansas 66210 • (913) 469-5615 • FAX (913) 469-1662

93040952766

2372

OWEN & ASSOCIATES, INC.
11011 KING ST., STE. 260
OVERLAND PARK, KS 66210

83-172/1010

July 2 19 93

PAY TO THE ORDER OF Federal Election Commission $ *2,000.00

Two Thousand and no/100 ---------- DOLLARS

First National Bank of Olathe
MEMBER FDIC . . 444 E. Santa Fe . . Olathe, KS 66061 . . (913) 782-3211

FOR MUR 3309

David C. Owen

"002372" "101001720" "05 813 0"

93 JUL 13 AM 11:05

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 3309
)
John J. Hamilton)
The RBA Group) **SENSITIVE**

GENERAL COUNSEL'S REPORT

I. BACKGROUND

a. John J. Hamilton

On September 29, 1992, the Federal Election Commission voted to enter into pre-probable cause conciliation with John J. Hamilton with regard to an excessive contribution made to the Dole for President Committee ("Dole Committee").[1] During its review of the Dole Committee's record, Commission auditors found that Mr. Hamilton had paid $2,000 on March 30, 1987, so that he and a friend could attend a Dole Committee fundraiser. Mr. Hamilton had made one earlier contribution to the Dole Committee in the amount of $25.00. The Dole Committee refunded to Mr. Hamilton the excessive amount of $1,025 on June 28, 1987, or 90 days after receipt of the second contribution.

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1. Of twenty individuals discovered to have made contributions to the Dole Committee in amounts over twice the legal limit, the Commission has already voted to take no further action against fifteen.

b. The RBA Group

On September 29, 1992, the Commission also voted to enter into pre-probable cause conciliation with the RBA Group with regard to a $2,000 contribution from this corporation to the Dole Committee. The Commission's audit of the Committee's records revealed that, on or about December 2, 1987, the RBA Group made a $2000 contribution to the Committee drawn on a corporate account. The president of the corporation has stated in an affidavit submitted in this matter: that the $2,000 payment was for the purchase of two tickets to the New Jersey Tribute to Senator Bob Dole dinner on December 8, 1987; and that he was "unaware of any impropriety" in purchasing the tickets with an RBA check. The president of RBA also stated in his affidavit that it was his understanding that the principals of the corporation had reimbursed either the company or the Dole Committee with personal funds and that the Dole Committee had returned the check. Other than the affidavit, the Commission has no evidence of either the reimbursement or of the $2,000 corporate check having been returned by the Committee.

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II. ANALYSIS

The excessive contribution made by Mr. Hamilton totals $1,025.

Given the relatively small amount involved, and the current status of this matter, this Office recommends that the Commission take no

further action as to the violation of 2 U.S.C. § 441a(a)(1)(A) by Mr. Hamilton.

The president of The RBA Group also set forth in his affidavit his recollection that its $2,000 contribution was returned by the Dole Committee and replaced with personal funds. Although no other documentation has been provided in support of these arguments, this Office recommends that, in light of the successful resolution of the outstanding issues with respect to Dole for President, Campaign America, and all other respondents, and the status of this matter as a whole, the Commission take no further action with regard to this respondent's apparent violation of 2 U.S.C. § 441b.

III. **RECOMMENDATIONS**

1. Take no further action with regard to John J. Hamilton and The RBA Group.

2. Approve the appropriate letters.

7/20/93
Date

Lawrence M. Noble
General Counsel

Staff assigned: Anne Weissenborn, Lawrence Parrish and Jeffrey Long

9304095277 69

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
John J. Hamilton;	)	MUR 3309
The RBA Group.	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on July 22, 1993, the Commission decided by a vote of 6-0 to take the following actions in MUR 3309:

1. Take no further action with regard to John J. Hamilton and The RBA Group.

2. Approve the appropriate letters, as recommended in the General Counsel's Report dated July 20, 1993.

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

Attest:

7-23-93
Date

Marjorie W. Emmons
Secretary of the Commission

Received in the Secretariat: Tues., July 20, 1993 2:27 p.m.
Circulated to the Commission: Tues., July 20, 1993 4:00 p.m.
Deadline for vote: Fri., July 23, 1993 4:00 p.m.

bjr

9304095277O

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CLOSED

JULY 29, 1993

CONFIDENTIAL

John Hamilton
1020 Union Street
Suite 15
San Francisco, CA 94133

RE: MUR 3309

Dear Mr. Hamilton:

On November 21, 1991, you were notified that the Federal Election Commission found reason to believe that you violated 2 U.S.C. § 441a(a)(1)(A). On December 2, 1991, you submitted a response to the Commission's reason to believe finding. After considering the circumstances of the matter, the Commission determined on July 19, 1993, to take no further action against you, and closed the file 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.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Jeffrey J. Long

Jeffrey Long
Paralegal

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

JULY 29, 1993

John J. Maiorana, Esquire
RBA Group
1 Evergreen Place
P.O. Box 1927
Morristown, NJ 07962-1927

RE: MUR 3309

Dear Mr. Maiorana:

On October 29, 1991, you were notified that the Federal Election Commission found reason to believe that RBA Group violated 2 U.S.C. § 441b. On December 17, 1992, RBA Group submitted a response to the Commission's reason to believe finding. After considering the circumstances of the matter, the Commission determined on July 19, 1993, to take no further action against RBA Group, and closed the file 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.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Lawrence D. Parrish

Lawrence D. Parrish
Attorney

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
)
Dole for President Committee)
James L. Hagen, as treasurer)
Campaign America)
Judith F. Taggart, as treasurer)

SENSITIVE

MUR 3309

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached are two conciliation agreements, the first signed by Scott E. Morgan, counsel for the Dole for President Committee, and the second signed by Kenneth A. Gross, counsel for Campaign America.

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II. **RECOMMENDATIONS**

1. Accept the attached conciliation agreement with the Dole for President Committee and James L. Hagen, as treasurer.

2. Accept the attached conciliation agreement with Campaign America and Judith F. Taggart, as treasurer.

2. Close the file.

3. Approve the appropriate letters.

7/13/93
Date

Lawrence M. Noble
General Counsel

Attachments

1. Letter and Conciliation Agreement, Dole for President
2. Letter and Conciliation Agreement, Campaign America

Staff Assigned: Anne A. Weissenborn

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Dole for President Committee and James L. Hagen, as treasurer; Campaign America and Judith F. Taggart, as treasurer.	)	MUR 3309

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on July 19, 1993, the Commission decided by a vote of 5-0 to take the following actions in MUR 3309:

1. Accept the conciliation agreement with the Dole for President Committee and James L. Hagen, as treasurer, as recommended in the General Counsel's Report dated July 13, 1993.

2. Accept the conciliation agreement with Campaign America and Judith F. Taggart, as treasurer, as recommended in the General Counsel's Report dated July 13, 1993.

(continued)

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3. Close the file.

4. Approve the appropriate letters, as recommended in the General Counsel's Report dated July 13, 1993.

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

Attest:

7-20-93
Date

Marjorie W. Emmons
Secretary of the Commission

Received in the Secretariat: Tues., July 13, 1993 4:37 p.m.
Circulated to the Commission: Wed., July 14, 1993 11:00 a.m.
Deadline for vote: Mon., July 19, 1993 4:00 p.m.

bjr

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CLOSED

JULY 29, 1993

Scott E. Morgan, Esquire
1618 Inverness Drive
Lawrence, Kansas 66047

RE: MUR 3309
Dole for President Committee
James L. Hagen, as treasurer

Dear Mr. Morgan:

On July 19, 1993, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on your clients' behalf in settlement of violations of 2 U.S.C. §§ 434, 441a(b)(1)(A), 441a(f), and 441b, provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"), and of 26 U.S.C. § 9035(a). 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.

Enclosed you will find a copy of the fully executed conciliation agreement for your files. Please note that the civil

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penalty is due within 30 days of the conciliation agreement's effective date. We ask that you provide the Commission with copies of the checks used to make the required refunds of all outstanding prohibited and excessive contributions.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Anne A. Weissenborn

Anne A. Weissenborn
Senior Attorney

Enclosure
Conciliation Agreement

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BEFORE THE FEDERAL ELECTION COMMISSION

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FEDERAL ELECTION COMMISSION
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In the Matter of	)	
	)	
	)	MUR 3309
Dole for President Committee	)	
and James L. Hagen, as treasurer	)	

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 the Dole for President Committee and James L. Hagen, as treasurer, ("Respondents") violated 2 U.S.C. § 434, 441a(b)(1)(A), 441a(f), and 441b, and 26 U.S.C. § 9035(a).

NOW, THEREFORE, the Commission and the Respondents, 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 Respondents 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. 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. The Dole for President Committee is a political committee within the meaning of 2 U.S.C. § 431(4).

2. James L. Hagen is the treasurer of the Dole for President Committee.

3. The Dole for President Committee was the principal campaign committee of United States Senator Robert Dole during the 1988 presidential primary election campaign.

4. During the 1987-88 election cycle Campaign America was a multicandidate political committee within the meaning of 2 U.S.C. § 431(4) and 2 U.S.C. § 44la(a)(4).

5. In 1986 and 1987 Senator Dole served as "honorary chairman" of Campaign America.

6. Pursuant to 2 U.S.C. § 431(8)(A) and 11 C.F.R. § 100.7(a), 26 U.S.C. § 9032(4) and 11 C.F.R. § 9032.4, a contribution includes any gift, subscription, loan, advance, or deposit of money or anything of value made for purposes of influencing a federal election. "Anything of value" includes in-kind contributions. 11 C.F.R. § 100.7(a)(1)(iii).

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7. When an individual becomes a candidate, any funds received, loans obtained or disbursements made in connection with his or her campaign prior to becoming a candidate shall be deemed to have been received, obtained, or made as an agent of his or her campaign. 11 C.F.R. §101.2(b).

8. Funds received and payments made solely for the purpose of determining whether an individual should become a candidate, i.e., for "testing-the-waters," are not contributions or expenditures for purposes of the Act. If the individual subsequently becomes a candidate, the funds received and/or expended become contributions subject to the reporting requirements and limitations of 2 U.S.C. § 434 and 44la(b). 11 C.F.R. § 100.7(b)(1)(i).

9. Pursuant to 2 U.S.C. § 44la(a)(2)(A), no multicandidate political committee may make contributions to any candidate and his or her authorized political committee with respect to any election for Federal office which, in the aggregate, exceed $5,000.

10. Pursuant to 2 U.S.C. § 44la(f), no political committee may knowingly accept contributions in excess of the limitations established at 2 U.S.C. § 44la(a).

11. In 1986 and 1987, Campaign America expenditures in Iowa on behalf of Senator Robert Dole constituted testing-the-waters expenditures totaling $41,887.82 and became in-kind contributions when he became a candidate.

12. In 1986 and 1987, Campaign America expenditures in New Hampshire on behalf of Senator Robert Dole constituted testing-the-waters expenditures totaling $5,359.42 and became in-kind contributions when he became a candidate.

13. Campaign America made a total of $47,247.24 in expenditures on behalf of the Dole for President Committee, thus exceeding the $5,000 statutory limitation on contributions by $42,247.24.

14. Pursuant to 2 U.S.C. § 44la(b)(1)(A) and 44la(c) and 26 U.S.C. § 9035(a), no candidate for the office of President of the United States, who is eligible under Section 9033 of Title 26 to receive payments from the Secretary of the Treasury, may make expenditures in any one state aggregating in excess of the greater of 16 cents multiplied by the voting age population of the state, or $200,000.00, as adjusted by changes in the Consumer Price index. Except for expenditures exempted under 11 C.F.R. § 106.2, expenditures incurred by a candidate's authorized committee(s) for the purpose of influencing the nomination of that candidate for the office of President with respect to a particular state shall be allocated to that state. 11 C.F.R. §106.2(a)(1).

15. For the 1988 presidential primary elections, the expenditure limitation for the State of Iowa was $775,217.60. Respondents exceeded this limitation by $304,065.44.

16. For the 1988 presidential primary elections, the expenditure limitation for the State of New Hampshire was $461,000. Respondents exceeded this limitation by $284,084.46.

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17. Pursuant to 2 U.S.C. § 441b, it is prohibited for political committees knowingly to accept contributions from corporate entities.

18. Respondents knowingly accepted direct and in-kind contributions totaling $64,043 from corporate entities; $7,201 has been refunded. These contributions include two uses of corporate aircraft for which the Committee made reimbursements which were a total of $3,750 less than the normal and usual charges for the services provided. $56,842 remains unrefunded.

19. Pursuant to 11 C.F.R. § 114.9(e), a candidate, a candidate's agent, or a person traveling on behalf of a candidate who uses, in connection with a federal election, an airplane which is owed or leased by a corporation, other than a corporation licensed to offer commercial services for travel, must reimburse the corporation in advance for the costs involved in such transportation.

20. Respondents used the aircraft of 15 corporations for which they made 26 payments totaling $54,264.85. These payments were not made in advance of the travel involved. Included in this figure is a $2,475 in-kind contribution from a corporation which accepted a payment which was $2,475 less than the amount billed for use of the aircraft used by Respondents. All other amounts for use of corporate aircraft have been paid.

21. 2 U.S.C. § 44la(a)(1)(A) limits to $1,000 per election the amount which any individual, partnership, or political committee which is not a multicandidate committee may contribute to a candidate or his or her authorized committee.

22.Respondents knowingly accepted a total of $239,131.81 in contributions from 418 individuals which exceeded their respective $1,000 limitations; all necessary refunds have been made.

23.Respondent knowingly accepted a total of $4,000 in contributions from three partnerships, P and D Realty Company, Bertram Associates, and Altman Brothers, which exceeded their respective $1,000 limitations; $2,000 has been refunded. $2,000 remains outstanding.

24. Respondents knowingly accepted a total of $8,375 in contributions from seven political committees which exceeded the committees' respective $1,000 limitations; $7,375 has been refunded. $1,000 remains outstanding.

25. Pursuant to 11 C.F.R. § 9003.3(a)(1)(iii), presidential candidates are permitted to accept contributions to a legal and accounting compliance fund prior to nomination for use if the candidate becomes a candidate in the general election. Such candidates are also permitted to deposit into such a compliance fund redesignated contributions which exceed the contributors' limitations for the primary election. If the candidate does not continue into the general election, any contributions made with respect to that election must be refunded,

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redesignated or reattributed within sixty days from the date of the nomination for president by the party of a candidate who is not the nominee. 11 C.F.R. S 102.9(e).

26. Respondents sought redesignation for, and transferred to, a legal and accounting compliance fund $102,662.55 in otherwise excessive contributions received for the primary election. They also received $16,292 in direct contributions to the fund.

27. The Republican Party nominated its candidate for President on August 17, 1988. Therefore, Respondents should have refunded, redesignated or reattributed the contributions placed in the legal and accounting compliance fund within sixty days of that date or no later than October 16, 1988. As of October 16, 1988, $48,598.55 had not been refunded or redesignated. Respondents have submitted copies of refund checks totaling $48,748.55 dated January 16 and 17, 1991. No further refunds are required.

28. 2 U.S.C. § 434 requires, that each treasurer of a political committee file reports of receipts and disbursements. A principal campaign committee is required to consolidate in each of its reports the reports submitted to it by any authorized committee. 11 C.F.R. § 104.3(f).

29. Dole for President Committee had eighteen authorized delegate committees, three in Maryland and fifteen in Illinois. As a principal campaign committee, it was responsible for obtaining information on the receipts and expenditures of the delegate committees and for consolidating that information in its reports to the Commission.

30. Respondents failed to report the receipts and disbursements of eighteen delegate committees in consolidated reports.

V. Respondents knowingly accepted $42,247.24 in excessive in-kind contributions from Campaign America, in violation of 2 U.S.C. § 44la(f). The entire $42,247.24 remains unrefunded.

VI. Respondents exceeded the primary campaign expenditure limitations for the states of Iowa and New Hampshire by a total of $588,149.90, in violation of 2 U.S.C. § 441a(b)(1)(A) and 26 U.S.C. § 9035(A).

VII. Respondents knowingly accepted contributions totaling $64,043 from corporate entities, in violation of 2 U.S.C. § 441b. $56,842 remains unrefunded.

VIII. Respondents failed to make advance payments totaling $54,264.85 for the use of corporate aircraft, in violation of 2 U.S.C. § 441b. $2,475 remains unpaid.

IX. Respondents knowingly accepted excessive contributions totaling $239,131.81 from 416 individuals, in violation of 2 U.S.C. § 44la(f). All necessary refunds have been made.

X. Respondents knowingly accepted excessive contributions totaling $4,000 from three partnerships, in violation of 2 U.S.C. § 441a(f). $2,000 remains unrefunded.

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XI. Respondents knowingly accepted excessive contributions totaling $8,375 in contributions from seven political committees, in violation of 2 U.S.C. § 44la(f). $1,000 remains unrefunded.

XII. Respondents failed to refund or to obtain redesignations or reattributions for $48,598.55 in contributions to a legal and accounting compliance fund within sixty days of the date upon which the Republican Party nominated a candidate for the office of President in 1988, in violation of 2 U.S.C. § 44la(f). All necessary refunds have been made.

XIII. Respondents failed to report the receipts and disbursements of eighteen delegate committees in consolidated reports, in violation of 2 U.S.C. § 434.

XV. Respondents will refund all outstanding excessive and prohibited contributions. This is a total of $104,564.30. Such contributions will be refunded either directly to the original contributors or to the U.S. Treasury.

XIV. Respondents will pay a civil penalty to the Federal Election Commission in the amount of One Hundred Thousand Dollars ($100,000.00), pursuant to 2 U.S.C. § 437g(a)(5)(A).

XVI. 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.

XVI. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

XVII. Respondents shall have no more than 30 days from the date this agreement becomes effective to comply with and implement the requirement(s) contained in this agreement and to so notify the commission.

XVIII. 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

7/29/93
Date

FOR THE RESPONDENTS:

Scott E. Morgan
Counsel, Dole for President

7/7/93
Date

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

JULY 29, 1993

Kenneth A. Gross, Esquire
Skadden, Arps, Slate, Meagher & Flom
1440 New York Avenue, NW
Washington, DC 20005-2107

RE: MUR 3309
Campaign America, Inc.
Judith F. Taggert,
as treasurer

Dear Mr. Gross:

On July 19, 1993, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on your clients' behalf in settlement of a violation of 2 U.S.C. § 441a(a)(2)(A), 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,

Anne A. Weissenborn

Anne A. Weissenborn
Senior Attorney

Enclosure
Conciliation Agreement

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
	)	MUR 3309
Campaign America Judith F. Taggart, as treasurer	)	

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 Campaign America and Judith F. Taggart, as treasurer, ("Respondents") violated 2 U.S.C. § 441a(a)(2)(A).

NOW, THEREFORE, the Commission and the Respondents, 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 Respondents 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. Respondents have 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. Campaign America is a registered multicandidate political committee within the meanings of 2 U.S.C. § 431(4) and 2 U.S.C. § 441a(a)(4).

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2. Judith F. Taggart is the treasurer of Campaign America.

3. In 1986 and 1987 United States Senator Robert Dole was the "honorary chairman" of Campaign America.

4. 2 U.S.C. § 441a(a)(2)(A) and 11 C.F.R. § 110.2(a)(1) limit to $5,000 the amount which a multicandidate committee may contribute to any candidate and his or her authorized political committee with respect to any election for Federal office.

5. 2 U.S.C. § 431(8)(A) defines "contribution" to include anything of value provided to any person for purposing of influencing a Federal election.

6. 11 C.F.R. § 100.7(a)(1)(iii)(A) defines "anything of value" to include all in-kind contributions.

7. 11 C.F.R. § 100.7(b)(1)(i) excludes from the definition of "contribution" funds received for the purpose of determining whether or not an individual should become a candidate, i.e., for "testing-the-waters" for a future candidacy. If that individual does later become a candidate, the same funds become contributions for purposes of the Federal Election Campaign Act ("the Act"). See also 11 C.F.R. § 101.3.

8. In 1986 and 1987 Respondents sponsored a series of events in the state of Iowa, prior to the registration of the Dole for President Exploratory Committee on March 13, 1987, including the following:

a. A February 7, 1987, town meeting in Orange City;

b. A February 12, 1987, town meeting in Dubuque;

c. A February 22, 1987, town meeting in Des Moines;

d. A February 23, 1987, breakfast meeting in Davenport.

9. Invitation postcards for the town meetings sponsored by Campaign America used the same format and picture of Senator Dole, and were printed by the same Iowa firm, as were invitation postcards later used by the Dole for President Committee. The Campaign America postcards contained the sentence, "During this meeting I would like to hear your views and concerns while sharing some of my own with you regarding our shared Republican future."

10. Campaign America produced a memorandum dated February 18, 1987, which in part discussed "Quad City Issues." Davenport, Iowa, is one of the Quad Cities. The memorandum also included a section entitled "Offer Iowans a Friend in the White House."

11. Campaign America expenditures in 1987 related to the four events in Iowa cited in Section IV, 4, included $14,684.35 for the town meetings and breakfast meeting, $10,214.70 in staff expenses, and $6,522.50 and $1,476 for staff interstate transportation, for a total of $32,897.55.

12. Campaign America also made expenditures in Iowa totaling $8,990.27 for a telemarketing program designed in part to create a list of supporters of Senator Dole. The survey data was used with respect to Campaign America events in Iowa in January and February, 1987.

13. The Campaign America expenditures in Iowa on behalf of Senator Robert Dole cited at Section IV, 11 and 12 constituted

testing-the-waters expenditures totaling $41,887.82 and became in-kind contributions when he became a candidate.

14. Campaign America made 117 expenditures to various towns on behalf of Senator Robert Dole in New Hampshire in 1986 and 1987 for voter lists. These payments totaled $3,136.26.

15. Campaign America made expenditures on behalf of Senator Dole in New Hampshire in 1986 and 1987 for a business telephone, the number of which was later used and paid for by the Dole for President Committee. These payments totaled $2,223.16.

16. The Campaign America expenditures in New Hampshire on behalf of Senator Robert Dole cited at Section IV, 14 and 15 constituted testing-the-waters expenditures totaling $5,359.42 and became in-kind contributions when he became a candidate.

V. Respondents made a total of $47,247.24 in in-kind contributions in Iowa and New Hampshire on behalf of Senator Robert Dole, thus exceeding the $5,000 limitation on contributions to the Dole for President Committee by $42,247.24, in violation of 2 U.S.C. § 441a(a)(2)(A).

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of Twelve Thousand Dollars ($12,000.00) 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

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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. 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

7/29/93
Date

FOR THE RESPONDENTS:

Kenneth A. Gross
Attorney for Campaign America
Judith F. Taggart, as Treasurer

July 12, 1993
Date

93040952790

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

JULY 29, 1993

Steven W. Katz, Esquire
Katz & Pantirer
1325 Morris Avenue
P.O. Box 685
Union, NJ 07083

RE: MUR 3309
Bertram Associates

Dear Mr. Katz:

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,

Lawrence D. Parrish

Lawrence D. Parrish
Attorney

93040952791

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

JULY 29, 1993

Marcus T. Hickman, Esquire
Kennedy Covington Lobdell & Hickman
3300 NCNB Plaza
Charlotte, NC 28280-6000

RE: MUR 3309
Becon Construction Company

Dear Mr. Hickman:

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,

Lawrence D. Parrish

Lawrence D. Parrish
Attorney

93040952792

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

JULY 29, 1993

Philip S. Beck, Esquire
Kirkland & Ellis
200 East Randolph Drive
Chicago, IL 60601

RE: MUR 3309
Contran

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,

Lawrence D. Parrish

Lawrence D. Parrish
Attorney

93040952793

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

JULY 29, 1993

Geraldine A. Price
H & W Aviation
9400 North Broadway 1700
Oklahoma, OK 73114

RE: MUR 3309

Dear Ms. Price:

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,

Lawrence D. Parrish

Lawrence D. Parrish
Attorney

2340952794

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

JULY 29, 1993

Jonathan Sallet
Jenner & Block
601 Thirteenth Street, NW
Washington, DC 20005

RE: MUR 3309
Long Lines Limited

Dear Mr. Sallet:

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,

Lawrence D. Parrish

Lawrence D. Parrish
Attorney

9304095279 5

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

JULY 29, 1993

David C. Owen
Owen and Associates
11827 West 112th Street
Suite 102
Overland Park, NJ 66210

RE: MUR 3309

Dear Mr. Owen:

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,

Lawrence D. Parrish

Lawrence D. Parrish
Attorney

93040952796

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

JULY 29, 1993

Mr. David P. Romano
P and D Realty Company
Morris Canal Plaza
1070 US Highway 46
Ledgewoode, NJ 07852

RE: MUR 3309

Dear Mr. Romano:

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,

Lawrence D. Parrish

Lawrence D. Parrish
Attorney

9304095277 97

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

JULY 29, 1992

Joseph F. Lewandowski
Altman Brothers
115 New Street
Glenside, PA 19038

RE: MUR 3309

Dear Mr. Lewandowski:

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,

Jeffrey D. Long

Jeffrey Long
Paralegal

2340952798

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

JULY 29, 1993

Betty Ray Atkins
21 Canaan Close
New Canaan, CT 06840

RE: MUR 3309

Dear Ms. Atkins:

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,

Jeffrey D. Long

Jeffrey Long
Paralegal

9304095279 9

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

JULY 29, 1993

Mitzi Ayala
744 Lake Terrace Circle
Davis, CA 95616

RE: MUR 3309

Dear Ms. Ayala:

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,

Jeffrey D Long

Jeffrey Long
Paralegal

9304095528800

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

JULY 29, 1993

Floyd Ayers
19838 Encino Brook Street
San Antonio, Texas 78359

RE: MUR 3309

Dear Mr. Ayers:

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,

Jeffrey Long

Jeffrey Long
Paralegal

2304095280 1

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

JULY 29, 1993

Thomas J. Lucas, Esquire
Aiken, St. Louis & Siljeg
1215 Norton Building
801 Second Avenue
Seattle, WA 98104

RE: MUR 3309
Matthew M. Clapp, Jr.

Dear Mr. Lucas:

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,

Jeffrey D. Long

Jeffrey Long
Paralegal

2304095280 2

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

JULY 29, 1993

Edna Davol
40 Holbrook Avenue
Rumford, RI 02916

RE: MUR 3309

Dear Ms. Davol:

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,

Jeffrey Long
Paralegal

2304095280 3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

JULY 29, 1993

Doris Freeman
1103 Edgewater Drive
Orlando, FL 32804

RE: MUR 3309

Dear Ms. Freeman:

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,

Jeffrey Long

Jeffrey Long
Paralegal

2304095280 4

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

JULY 29, 1993

Lydia Fried
#6 Vendome Court
Bethesda, MD 20817

RE: MUR 3309

Dear Ms. Fried:

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,

Jeffrey Long
Paralegal

9304095280 5

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

JULY 29, 1993

Willis Hesselroth
4433 Sea Forest Drive
Kiawah Island, SC 29455

RE: MUR 3309

Dear Mr. Hesselroth:

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,

Jeffrey Long

Jeffrey Long
Paralegal

9304095280 6

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

JULY 29, 1993

John W. King
31 Buckingham Road
Norwood, MA 02062

RE: MUR 3309

Dear Mr. King:

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,

Jeffrey Long

Jeffrey Long
Paralegal

9304095280 7

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

JULY 29, 1993

Maurice Lancaster
12204 Alhambra
Leawood, KS 66209

RE: MUR 3309

Dear Mr. Lancaster:

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,

Jeffrey Long
Paralegal

2304095280 8

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

JULY 29, 1993

Katherine F. McCoy
P.O. Box 2413
West Palm Beach, FL 33402

RE: MUR 3309

Dear Ms. McCoy:

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,

Jeffrey Long
Paralegal

9304095280 9

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

JULY 29, 1993

Robert Whitelaw
Obermayer, Rebmann, Maxwell & Hippel
14th Floor Packard Building
Philadelphia, PA 19102

RE: MUR 3309

Dear Mr. Whitelaw:

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,

Jeffrey Long
Paralegal

9304095281 0

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

JULY 29, 1993

Richard W. Schuermann, Jr., Esquire
Emens, Hurd, Kegler & Ritter Co., LPA
65 E. State Street, Suite 1800
Columbus, OH 43215

RE: MUR 3309
U.E. Patrick

Dear Mr. Schuermann:

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,

Jeffrey D. Long

Jeffrey Long
Paralegal

9304095281 1

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

JULY 29, 1993

James G. Vetter, Jr., Esquire
Godwin, Carlton & Maxwell
3300 NCNB Plaza
901 Main Street
Dallas, TX 75202

RE: MUR 3309
Lonnie Ken Pilgrim

Dear Mr. Vetter:

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,

Jeffrey Long

Jeffrey Long
Paralegal

93040952812

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

JULY 29, 1993

Donald H. Piser
45 West 60th Street
32K
New York, NY 10023

RE: MUR 3309

Dear Mr. Piser:

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,

Jeffrey D Long

Jeffrey Long
Paralegal

2304095281 3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

JULY 29, 1993

Dennis V. Griffiths, Esquire
3850 Three Mile Lane
McMinnville, Oregon 97128

RE: MUR 3309
Delford M. Smith

Dear Mr. Griffiths:

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,

Jeffrey Long
Paralegal

9304095281 4

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

JULY 29, 1993

Leroy C. Tombs, Jr.
8304 Oakland
Kansas City, Kansas 66011

RE: MUR 3309

Dear Mr. Tombs:

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,

Jeffrey Long

Jeffrey Long
Paralegal

9304095281 5

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

JULY 29, 1993

Edmund S. Wartels
Crow Hill Road
Mt. Kisco, NY 10549

RE: MUR 3309

Dear Mr. Wartels:

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.

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Sincerely,

Jeffrey D. Long

Jeffrey Long
Paralegal

9304095281 6

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

JULY 29, 1993

William Oldaker, Esquire
Manatt, Phelps, Philips & Kantor
Suite 200
1200 New Hampshire Avenue, NW
Washington, D.C. 20036

RE: MUR 3309
Dave Williams

Dear Mr. Oldaker:

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,

Jeffrey Long
Paralegal

2304095281 7

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

JULY 29, 1993

Carla L. Saunders, Treasurer
U.S. Federation of
Small Businesses PAC
208 G Street, N.E.
Washington, D.C. 20002

RE: MUR 3309

Dear Ms. Saunders:

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,

Jeffrey D. Long

Jeffrey Long
Paralegal

93040952818

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

JULY 29, 1993

Gary K. Bracken, Treasurer
Tele-Communications, Inc., PAC
P.O. Box 5630
Denver, CO 80217

RE: MUR 3309

Dear Mr. Bracken:

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,

Jeffrey S. Long

Jeffrey Long
Paralegal

9304095281 9

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

JULY 29, 1993

R. Todd Johnson, Esquire
Jones, Day, Reavis & Pogue
Metropolitan Square
1450 G Street, N.W.
Washington, DC 20005-2088

RE: MUR 3309
Ernst & Young Los Angeles PAC and
Harry D. Slaughter, III as treasurer

Dear Mr. Johnson:

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,

Jeffrey Long

Jeffrey Long
Paralegal

93040952820

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

JULY 29, 1993

Vigo G. Nielsen, Jr., Esquire
Nielsen, Merksamer, Hodgson,
Parrinello & Mueller
591 Redwood Highway, Suite 4000
Mill Valley, CA 94941

RE: MUR 3309
Fluor Corporation and
Andrew M. Schwartz, as
treasurer

Dear Mr. Nielsen:

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,

Jeffrey D. Long

Jeffrey Long
Paralegal

9304095282 1

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

JULY 29, 1993

Robert J. Mageau, Treasurer
Hartford Insurance Group PAC
Hartford Plaza
Hartford, CT 06115

Attn: Henry Katz

RE: MUR 3309

Dear Mr. Katz:

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,

Jeffrey D. Long

Jeffrey D. Long
Paralegal

9304095228822

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

JULY 29, 1993

Carol A. Laham, Esquire
Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, D.C. 20006

RE: MUR 3309
General Electic Company
PAC and Robert W. Nelson,
as treasurer

Dear Ms. Laham:

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,

Jeffrey Long

Jeffrey Long
Paralegal

93040952823

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

AUGUST 2, 1993

Lyn Utrecht, Esquire
Oldaker, Ryan & Leonard
818 Connecticut Avenue, N.W.
Suite 1100
Washington, DC 20006

RE: MUR 3309
Browning-Ferris Industries

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,

Lawrence D. Parrish

Lawrence D. Parrish
Attorney

2304095228824

THIS IS THE END OF MUR # 3309

93040952825

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 3309

DATE FILMED 8-4-93 CAMERA NO. 4

CAMERAMAN JM M

93040955288226

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

✓ Microfilm

_____ Public Rcds

_____ Press

THE FOLLOWING DOCUMENTATION IS ADDED TO

THE PUBLIC RECORD IN CLOSED MUR 3309.

8/30/93

93040954846

CLOSED

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

Aug. 23, 1993

TWO WAY MEMORANDUM

TO: OGC, Docket

FROM: Philomena Brooks
Accounting Technician

SUBJECt: Account Determination for Funds Received

We recently received a check from Dole for President, check number 6317, dated Aug. 17, 1993, and in the amount of $30,867.06. 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 $30,867.06, the MUR number is 3309 and in the name of Dole for President. 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

8-24-93
Date

93040954847

93 AUG 24 AM 9:20

RECEIVED

CLOSED

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Aug. 23, 1993

TWO WAY MEMORANDUM

TO: OGC, Docket

FROM: Philomena Brooks
Accounting Technician

SUBJECT: Account Determination for Funds Received

We recently received a check from Dole for President Cmte Inc., check number 63180, dated Aug. 17, 1993, and in the amount of $100,000.00. 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

In reference to the above check in the amount of $100,000.00, the MUR number is 3309 and in the name of Dole for President Cmte Inc. 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

8-24-93
Date

9304095448

DOLE FOR PRESIDENT COMMITTEE, INC.

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 WVO-3 V-2

DATE	DESCRIPTION	AMOUNT
8/17/93	Civil Penalty - MUR 3309	$100,000.00

DOLE FOR PRESIDENT COMMITTEE, INC.
[redacted]

SIGNET BANK
Vienna, VA Virginia

6318

August 17 19 93

68-408/560 405

PAY *One Hundred Thousand and 00/100********** DOLLARS $*100,000.00*

TO THE ORDER OF
United States Treasury
c/o Federal Election Commission
999 E Street, NW
Washington, DC 20463

James L. Hagen

⑈00006318⑈ ⑆056004089⑆ 652⑈00246699⑈

DELUXE CHECK PRINTERS

RECEIVED
FEDERAL ELECTION
COMMISSION
MAIN COPY ROOM
Aug 23 11:59 AM '93

August 18, 1993

Mr. Lawrence M. Noble, General Counsel
Federal Election Commission
999 E Street, NW
Washington, DC 20463

RE: MUR 3309
Dole for President Committee, Inc.
James L. Hagen, as Treasurer

Dear Mr. Noble:

As per the conciliation agreement fully executed on 7/29/93 regarding MUR 3309, please find the following:

1) Check #6318 in the amount of $100,000.00 for payment of the civil penalty.
2) Check #6317 in the amount of $30,867.06 for payment to the U.S. Treasury in lieu of refunds made directly to contributors.
3) Copies of refunds made directly to contributors totalling $73,697.24

The combined total of 2) and 3) above is $104,564.30 which agrees with the amount of outstanding excessive and prohibited contributions as noted in Article XV of the conciliation agreement.

If you have any questions, please contact me at 303/220-5433 or Scott E. Morgan at 913/842-6268.

Respectfully,

James L. Hagen

James L. Hagen, Treasurer
Dole for President Committee, Inc.

Enclosures

23040954850

DOLE FOR PRESIDENT COMMITTEE, INC.

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 WVO-3 V-2

DATE	DESCRIPTION	AMOUNT
8/17/93	Contribution Refunds (Excess/Corporate) Dole For President Committee, Inc. (C00213850) RE: MUR 3309	$30,867.06

V-2

DOLE FOR PRESIDENT COMMITTEE, INC.
[redacted]

SIGNET BANK
Vienna, VA Virginia

6317

August 17 19 93

68-408/560 405

PAY *Thirty Thousand Eight Hundred Sixty Seven and 06/100******** DOLLARS $*30,867.06*

TO THE ORDER OF
United States Treasury
c/o Federal Election Commission
999 E Street, NW
Washington, DC 20463

James L. Hagz

⑈00006317⑈ ⑆056004089⑆ 652⑈00246699⑈

DELUXE CHECK PRINTERS

DOLE FOR PRESIDENT
COMMITTEE, INC.

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 WVO-3 V-2

DATE	DESCRIPTION	AMOUNT
8/17/93	Contribution Refund	$42,247.24

V-2

DOLE FOR PRESIDENT COMMITTEE, INC.

SIGNET BANK
Vienna, VA Virginia

6281

August 18 19 93

68-408/560 405

PAY *Forty Two Thousand Two Hundred Forty Seven and 24/100****** DOLLARS $*42,247.24*

TO THE ORDER OF
Campaign America
900 Second Street, NE, #118
Washington, DC 20002

James L. Hagen

⑈00006281⑈ ⑆056004089⑆ 652⑈00246699⑈

DELUXE CHECK PRINTERS

930409548852

DOLE FOR PRESIDENT
COMMITTEE, INC.

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 WVO-3 V-2

DATE	DESCRIPTION	AMOUNT
8/17/93	Contribution Refund	$2,750.00

9-2

DOLE FOR PRESIDENT COMMITTEE, INC.
[illegible]
WASHINGTON, D.C. [illegible]

SIGNET BANK
Vienna, VA Virginia

6282

68-408/560 405

August 17 19 93

PAY *Two Thousand Seven Hundred Fifty and 00/100********** DOLLARS $*2,750.00*

TO THE ORDER OF
H & W Aviation
9400 North Broadway, #700
Oklahoma City, OK 73114

James L. Hagen

⑈00006282⑈ ⑆056004089⑆ 652⑈0024669⑈

DELUXE CHECK PRINTERS

930409548853

DOLE FOR PRESIDENT
COMMITTEE, INC.

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 WVO-3 V-2

DATE	DESCRIPTION	AMOUNT
8/17/93	Contribution Refund	$1,000.00

V-2

DOLE FOR PRESIDENT COMMITTEE, INC.
[illegible]

SIGNET BANK
Vienna, VA Virginia

6283

August 17, 1993

68-408/560 405

PAY *One Thousand and 00/100********** DOLLARS $*1,000.00*

TO THE ORDER OF
Owen & Associates
11827 W. 112th Street
Overland Park, KS 66210

James L. Hagen

⑈00006283⑈ ⑆056004089⑆ 652⑈0024669⑈

⑈3040954854

DOLE FOR PRESIDENT
COMMITTEE, INC.

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 WVO-3 V-2

DATE	DESCRIPTION	AMOUNT
8/17/93	Contribution Refund	$1,000.00

V-2

DOLE FOR PRESIDENT COMMITTEE, INC.
[illegible]

SIGNET BANK
Vienna, VA Virginia

6284

August 17 19 93

68-408/560 405

PAY *One Thousand and 00/100********** DOLLARS $*1,000.00*

TO THE ORDER OF
Ballet Limited Partners
1621 N. Olden Avenue
Trenton, NJ 08638

James L. Haag

⑈00006284⑈ ⑆056004089⑆ 652⑈00246699⑈

DELUXE CHECK PRINTERS

⑆304095488555

DOLE FOR PRESIDENT
COMMITTEE, INC.

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 WVO-3 V-2

DATE	DESCRIPTION	AMOUNT
8/17/93	Contribution Refund	$1,000.00

V-2

DOLE FOR PRESIDENT COMMITTEE, INC.
XXXXXXXXXXXXXXXXX
WASHINGTON, XXX XXXXX

SIGNET BANK
Vienna, VA Virginia

6285

August 17 1993

68-408/560 405

PAY *One Thousand and 00/100********** DOLLARS $ *1,000.00*

TO THE ORDER OF
Clinton Commons Associates
1621 N. Olden Avenue
Trenton, NJ 08639

James L. Hagen

⑈00006285⑈ ⑆056004089⑆ 652⑈0024669⑈

0 3 0 4 0 9 5 4 8 5 5 6

DOLE FOR PRESIDENT
COMMITTEE, INC.

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 WVO-3 V-2

DATE	DESCRIPTION	AMOUNT
8/17/93	Contribution Refund	$200.00

V-2

DOLE FOR PRESIDENT COMMITTEE, INC.
[illegible]

SIGNET BANK
Vienna, VA Virginia

6286

August 17 1993

58-408/560 405

PAY *Two Hundred and 00/100********** DOLLARS $*200.00*

TO THE ORDER OF
Columbia Management
137 Washington Street
Norwell, MA 02061

James L. Hagen

⑈00006286⑈ ⑆056004089⑆ 652⑈00246691⑈

⑆040954857

23

DOLE FOR PRESIDENT
COMMITTEE, INC.

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 WVO-3 V-2

DATE	DESCRIPTION	AMOUNT
8/17/93	Contribution Refund	$1,000.00

V-2

DOLE FOR PRESIDENT COMMITTEE, INC.
[illegible]

SIGNET BANK
Virginia
Vienna, VA

6287

August 17 1993

68-408/560 405

PAY *One Thousand and 00/100********** DOLLARS $*1,000.00*

TO THE ORDER OF
Committee for Humane Legislation, Inc.
11 West 60th Street
New York, NY 10023

James L. Hagen

⑈00006287⑈ ⑆056004089⑆ 652⑈00246691⑈

DELUXE CHECK PRINTERS

40 0 2 5 4 8 5 8

2 3

DOLE FOR PRESIDENT
COMMITTEE, INC.

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 WVO-3 V-2

DATE	DESCRIPTION	AMOUNT
8/17/93	Contribution Refund	$1,000.00

V-2

DOLE FOR PRESIDENT COMMITTEE, INC.
1[illegible]

SIGNET BANK
Vienna, VA
Virginia

6288

August 17 1993

68-408/560 405

PAY *One Thousand and 00/100********** DOLLARS $*1,000.00*

TO THE ORDER OF
D - J Company
The First Place
6821 East Kellogg
Wichita, KS 67207

James Lorbagel

⑈00006288⑈ ⑆056004089⑆ 652⑈00246699⑈

DELUXE CHECK PRINTERS

2304095485 59

DOLE FOR PRESIDENT
COMMITTEE, INC.

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 WVO-3 V-2

DATE	DESCRIPTION	AMOUNT
8/17/93	Contribution Refund	$1,000.00

V-2

DOLE FOR PRESIDENT COMMITTEE, INC.
[illegible]

SIGNET BANK
Vienna, VA Virginia

6289

August 17 19 93

68-408/560 405

PAY *One Thousand and 00/100********** DOLLARS $*1,000.00*

TO THE ORDER OF
East State Street Assoc. LP
1621 Olden Avenue, N.
Trenton, NJ 08638

James L. Hagel

⑈00006289⑈ ⑆056004089⑆ 652⑈00246699⑈

DELUXE CHECK PRINTERS

0 4 0 2 5 4 8 3 6 0

2 3

DOLE FOR PRESIDENT COMMITTEE, INC.

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 WVO-3 V-2

DATE	DESCRIPTION	AMOUNT
8/17/93	Contribution Refund	$1,000.00

V-2

DOLE FOR PRESIDENT COMMITTEE, INC.
[illegible]

SIGNET BANK
Vienna, VA Virginia

6290

August 17 1993

68-408/560 405

PAY *One Thousand and 00/100********** DOLLARS $*1,000.00*

TO THE ORDER OF
Edward White & Co.
Warner Financial Center
5950 Canoga Avenue, Suite 200
Woodland Hills, CA 91367

James L. Hagel

⑈00006290⑈ ⑆056004089⑆ 652⑈0024669⑈

0409548861

23

DOLE FOR PRESIDENT
COMMITTEE, INC.

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 WVO-3 V-2

DATE	DESCRIPTION	AMOUNT
8/17/93	Contribution Refund	$600.00

V-2

DOLE FOR PRESIDENT COMMITTEE, INC.

SIGNET BANK
Vienna, VA Virginia

6291

August 17 1993

68-408/560 405

PAY *Six Hundred and 00/100********** DOLLARS $*600.00*

TO THE ORDER OF
George Eschbaugh Advertising
Box 130
Wilson, KS 67490

James L. Hagen

⑈00006291⑈ ⑆056004089⑆ 652⑈00246699⑈

930095548662

DOLE FOR PRESIDENT COMMITTEE, INC.

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 WVO-3 V-2

DATE	DESCRIPTION	AMOUNT
8/17/93	Contribution Refund	$1,000.00

V-2

DOLE FOR PRESIDENT COMMITTEE, INC.
[illegible]

SIGNET BANK
Vienna, VA
Virginia

6292

August 17 1993

68-408/560 405

PAY *One Thousand and 00/100********** DOLLARS $*1,000.00*

TO THE ORDER OF
Kwik International Color LTD
111 Eighth Avenue
New York, NY 10011

James L. Hagen

⑈00006292⑈ ⑆056004089⑆ 652⑈00246691⑈

0 3 0 4 0 9 5 4 8 6 3

DOLE FOR PRESIDENT
COMMITTEE, INC.

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 WVO-3 V-2

DATE	DESCRIPTION	AMOUNT
8/17/93	Contribution Refund	$750.00

V-2

DOLE FOR PRESIDENT COMMITTEE, INC.
[illegible]

SIGNET BANK
Vienna, VA Virginia

6293

August 17 1993

68-406/560 405

PAY *Seven Hundred Fifty and 00/100********** DOLLARS $*750.00*

TO THE ORDER OF
Lauren K. Welch, M.D.
3243 E. Murdock, Suite 601
Wichita, KS 67208

James L. Hagel

⑈00006293⑈ ⑆056004089⑆ 652⑈0024669⑈

930409548864

DOLE FOR PRESIDENT COMMITTEE, INC.

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 WVO-3 V-2

DATE	DESCRIPTION	AMOUNT
8/17/93	Contribution Refund	$1,000.00

V-2

DOLE FOR PRESIDENT COMMITTEE, INC.

SIGNET BANK
Vienna, VA Virginia

6294

August 17 1993

68-408/560 405

PAY *One Thousand and 00/100********** DOLLARS $*1,000.00*

TO THE ORDER OF
Leslie Enterprises
Box 4456
Saticoy, CA 93004

James L. Hagel

⑈00006294⑈ ⑆056004089⑆ 652⑈00246691⑈

930095486 5

DOLE FOR PRESIDENT
COMMITTEE, INC.

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 WVO-3 V-2

DATE	DESCRIPTION	AMOUNT
8/17/93	Contribution Refund	$1,000.00

V-2

DOLE FOR PRESIDENT COMMITTEE, INC.
[redacted]

SIGNET BANK
Vienna, VA Virginia

6295

August 17 1993

68-408/560 405

PAY *One Thousand and 00/100********** DOLLARS $ *1,000.00*

TO THE ORDER OF
Los Angeles Drywall
3940 Gilman Street
Long Beach, CA 90815

James L. Hagel

⑈00006295⑈ ⑆056004089⑆ 652⑈00246699⑈

⑈30409548666

DOLE FOR PRESIDENT
COMMITTEE, INC.

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 WVO-3 V-2

DATE	DESCRIPTION	AMOUNT
8/17/93	Contribution Refund	$250.00

V-2

DOLE FOR PRESIDENT COMMITTEE, INC.
[illegible]

SIGNET BANK
Vienna, VA Virginia

6296

August 17 1993

68-408/560 405

PAY *Two Hundred Fifty and 00/100********** DOLLARS $*250.00*

TO THE ORDER OF
Lynn D. Ketchum, M.D.
12301 West 106th, Suite 201
Overland Park, KS 66215

James L. Hagen

⑈00006296⑈ ⑆056004089⑆ 652⑈0024669⑈

0 4 0 9 5 4 8 6 7

2 3

DOLE FOR PRESIDENT
COMMITTEE, INC.

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 WVO-3 V-2

DATE	DESCRIPTION	AMOUNT
8/17/93	Contribution Refund	$100.00

V-2

DOLE FOR PRESIDENT COMMITTEE, INC.
[illegible]

SIGNET BANK
Vienna, VA Virginia

6297

August 17 19 93

68-408/560 405

PAY *One Hundred and 00/100********** DOLLARS $*100.00*

TO THE ORDER OF
Miller Ranch
Tim Miller
115 Patton Road
Great Bend, KS 67530

James L. Hagel

⑈00006297⑈ ⑆056004089⑆ 652⑈0024669⑈

930409548868

DOLE FOR PRESIDENT
COMMITTEE, INC.

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 WVO-3 V-2

DATE	DESCRIPTION	AMOUNT
8/17/93	Contribution Refund	$1,000.00

DOLE FOR PRESIDENT COMMITTEE, INC.

SIGNET BANK
Vienna, VA Virginia

6298

August 17 1993

68-408/560 405

PAY *One Thousand and 00/100********** DOLLARS $*1,000.00*

TO THE ORDER OF
Miller, Canfield, Paddock & Stone
2500 Comerica Building
Detroit, MI 48226

James L. Hagen

⑈00006298⑈ ⑆056004089⑆ 652⑈00246699⑈

9 3

DOLE FOR PRESIDENT COMMITTEE, INC.

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 WVO-3 V-2

DATE	DESCRIPTION	AMOUNT
8/17/93	Contribution Refund	$1,000.00

V-2

DOLE FOR PRESIDENT COMMITTEE, INC.
[illegible]

SIGNET BANK
Virginia
Vienna, VA

6299

August 17 1993

68-408/560 405

PAY *One Thousand and 00/100********** DOLLARS $*1,000.00*

TO THE ORDER OF
McVean and Company
850 Ridge Lake Blvd, #G-01
Memphis, TN 38119

James L. Hagen

⑈00006299⑈ ⑆056004089⑆ 652⑈00246699⑈

930409254870

DOLE FOR PRESIDENT
COMMITTEE, INC.

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 WVO-3 V-2

DATE	DESCRIPTION	AMOUNT
8/17/93	Contribution Refund	$1,000.00

V-2

DOLE FOR PRESIDENT COMMITTEE, INC.
[illegible]

SIGNET BANK
Vienna, VA Virginia

6300

August 17 1993

68-408/560 405

PAY *One Thousand and 00/100********** DOLLARS $*1,000.00*

TO THE ORDER OF
Milton Fenster Associates
540 Madison Avenue
New York, NY 10022

James L. Hagen

⑈00006300⑈ ⑆056004089⑆ 652⑈0024669⑈

DELUXE CHECK PRINTERS

⑆304095487⑆

DOLE FOR PRESIDENT
COMMITTEE, INC.

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 WVO-3 V-2

DATE	DESCRIPTION	AMOUNT
8/17/93	Contribution Refund	$500.00

DOLE FOR PRESIDENT COMMITTEE, INC.
[illegible]

SIGNET BANK
Vienna, VA Virginia

6301

August 17 1993

68-408/560 405

PAY *Five Hundred and 00/100********** DOLLARS $*500.00*

TO THE ORDER OF
N. H. Bettigole Co.
601 Bergen Mall
Paramus, NJ 07652

James L. Hagz

⑈00006301⑈ ⑆056004089⑆ 652⑈00246691⑈

23040954872

DOLE FOR PRESIDENT
COMMITTEE, INC.

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 WVO-3 V-2

DATE	DESCRIPTION	AMOUNT
8/17/93	Contribution Refund	$1,000.00

V-2

DOLE FOR PRESIDENT COMMITTEE, INC.

SIGNET BANK
Vienna, VA Virginia

6302

August 17 19 93

68-408/560 405

PAY *One Thousand and 00/100********** DOLLARS $*1,000.00*

TO THE ORDER OF
Norman F. Sprague, Jr., M.D.
3600 Wilshire Blvd, Suite 2110
Los Angeles, CA 90010

James L. Hagel

⑈00006302⑈ ⑆056004089⑆ 652⑈0024669⑈

23040954873

DOLE FOR PRESIDENT
COMMITTEE, INC.

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 WVO-3 V-2

DATE	DESCRIPTION	AMOUNT
8/17/93	Contribution Refund	$1,000.00

V-2

DOLE FOR PRESIDENT COMMITTEE, INC.
[illegible]

SIGNET BANK
Vienna, VA Virginia

6303

August 17 1993

68-408/560 405

PAY *One Thousand and 00/100********** DOLLARS $*1,000.00*

TO THE ORDER OF
North Cote Farm
Route 1, Box 511
Forest, VA 24551

James L. Hagz

⑈00006303⑈ ⑆056004089⑆ 652⑈00246691⑈

930408548874

DOLE FOR PRESIDENT
COMMITTEE, INC.

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 WVO-3 V-2

DATE	DESCRIPTION	AMOUNT
8/17/93	Contribution Refund	$1,000.00

V-2

DOLE FOR PRESIDENT COMMITTEE, INC.
[illegible]

SIGNET BANK
Vienna, VA Virginia

6304

August 17 1993

68-408/560 405

PAY *One Thousand and 00/100********** DOLLARS $ *1,000.00*

TO THE ORDER OF
Palmer Development Co.
2735 Iris Avenue, Suite A
Boulder, CO 80302

James L. Hagen

⑈00006304⑈ ⑆056004089⑆ 652⑈00246691⑈

DELUXE CHECK PRINTERS

0 3

DOLE FOR PRESIDENT
COMMITTEE, INC.

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 WVO-3 V-2

DATE	DESCRIPTION	AMOUNT
8/17/93	Contribution Refund	$1,000.00

V-2

DOLE FOR PRESIDENT COMMITTEE, INC.
[redacted]

SIGNET BANK
Vienna, VA Virginia

6305

August 17 1993

68-408/560 405

PAY *One Thousand and 00/100********** DOLLARS $*1,000.00*

TO THE ORDER OF
Palmeri Harvey Young & Co.
111 Broadway, Suite 1308
New York, NY 10006

James L. Hagz—

⑈00006305⑈ ⑆056004089⑆ 652⑈0024669⑈

0 4 0 9 5 4 8 7 6

9 3

DOLE FOR PRESIDENT
COMMITTEE, INC.

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 W/VO-3 V-2

DATE	DESCRIPTION	AMOUNT
8/17/93	Contribution Refund	$500.00

V-2

DOLE FOR PRESIDENT COMMITTEE, INC.
[illegible]

SIGNET BANK
Vienna, VA Virginia

6306

August 17, 1993

68-408/560 405

PAY *Five Hundred and 00/100********** DOLLARS $*500.00*

TO THE ORDER OF
Richard P. Keim, D.D.S.
354 New Brotherhood Building
Kansas City, KS 66101

James L. Hagel

⑈00006306⑈ ⑆056004089⑆ 652⑈00246691⑈

0408548772306

DOLE FOR PRESIDENT
COMMITTEE, INC.

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 WVO-3 V-2

DATE	DESCRIPTION	AMOUNT
8/17/93	Contribution Refund	$1,000.00

V-2

DOLE FOR PRESIDENT COMMITTEE, INC.
[redacted]

SIGNET BANK
Vienna, VA Virginia

6307

August 17 19 93

68-408/560 405

PAY *One Thousand and 00/100********** DOLLARS $*1,000.00*

TO THE ORDER OF
Robert L. Manard, III
221 Carondelet Street, #400
New Orleans, LA 70130

James L. Hagel

⑈00006307⑈ ⑆056004089⑆ 652⑈0024669⑈

0304095487

DOLE FOR PRESIDENT
COMMITTEE, INC.

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 WVO-3 V-2

DATE	DESCRIPTION	AMOUNT
8/17/93	Contribution Refund	$1,000.00

V-2

DOLE FOR PRESIDENT COMMITTEE, INC.
[illegible]

SIGNET BANK
Vienna, VA Virginia

6308

August 17 19 93

68-408/560 405

PAY *One Thousand and 00/100********** DOLLARS $*1,000.00*

TO THE ORDER OF
Ronald Book, P.A.
20801 Biscayne Blvd, Suite 401
North Miami Beach, FL 33180

James L. Hagel

⑈00006308⑈ ⑆056004089⑆ 652⑈0024669⑈

930408954879

DOLE FOR PRESIDENT
COMMITTEE, INC.

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 WVO-3 V-2

DATE	DESCRIPTION	AMOUNT
8/17/93	Contribution Refund	$1,000.00

V-2

DOLE FOR PRESIDENT COMMITTEE, INC.
[illegible]

SIGNET BANK
Vienna, VA Virginia

6309

August 17 1993

68-408/560 405

PAY *One Thousand and 00/100********** DOLLARS $*1,000.00*

TO THE ORDER OF
Rosen, Ingberman & Rosen
900 Sylvan Avenue
Englewood Cliffs, NJ 07632

James L. Hagz

⑈00006309⑈ ⑆056004089⑆ 652⑈0024669⑈

930409548880

DOLE FOR PRESIDENT
COMMITTEE, INC.

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 WVO-3 V-2

DATE	DESCRIPTION	AMOUNT
8/17/93	Contribution Refund	$1000.00

V-2

DOLE FOR PRESIDENT COMMITTEE, INC.
[illegible]

SIGNET BANK
Vienna, VA Virginia

6310

August 17, 1993

68-408/560 405

PAY *One Thousand and 00/100********** DOLLARS $*1,000.00*

TO THE ORDER OF
Sacks Realty Co.
10 Huron Avenue
Jersey City, NJ 07304

James L. Hagen

⑈00006310⑈ ⑆056004089⑆ 652⑈00246691⑈

930409548881

DOLE FOR PRESIDENT COMMITTEE, INC.

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 WVO-3 V-2

DATE	DESCRIPTION	AMOUNT
8/17/93	Contribution Refund	$1,000.00

DOLE FOR PRESIDENT COMMITTEE, INC.
[illegible]

SIGNET BANK
Vienna, VA Virginia

6311

August 17 1993

68-408/560 405

PAY *One Thousand and 00/100********** DOLLARS $*1,000.00*

TO THE ORDER OF
Silvi Concrete Products
1903 Bristol Pike
Morrisville, PA 19067

James L. Hagen

⑈00006311⑈ ⑆056004089⑆ 652⑈00246699⑈

9304095488 2

DOLE FOR PRESIDENT COMMITTEE, INC.

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 WVO-3 V-2

DATE	DESCRIPTION	AMOUNT
8/17/93	Contribution Refund	$1,000.00

V-2

DOLE FOR PRESIDENT COMMITTEE, INC.
XXXXXXXXXXXXXXXXXXXX
XXXXXXXXXXXXXXXXXXXX

SIGNET BANK
Vienna, VA Virginia

6312

August 17 19 93

68-408/560 405

PAY *One Thousand and 00/100********** DOLLARS $*1,000.00*

TO THE ORDER OF
Stephen E. Genender, M.D.
8635 West Third Street, Suite 1090
West Tower
Los Angeles, CA 90048

James L. Hagel

⑈00006312⑈ ⑆056004089⑆ 652⑈002466 9⑈

DELUXE CHECK PRINTERS

230409548883

DOLE FOR PRESIDENT
COMMITTEE, INC.

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 WVO-3 V-2

DATE	DESCRIPTION	AMOUNT
8/17/93	Contribution Refund	$50.00

V-2

DOLE FOR PRESIDENT COMMITTEE, INC.
[illegible]

SIGNET BANK
Vienna, VA Virginia

6313

August 17 19 93

68-408/560 405

PAY *Fifty and 00/100********** DOLLARS $*50.00*

TO THE ORDER OF
Suburban Electric
P.O. Drawer 908
Crestline, CA 92325

James L. Hagen

⑈00006313⑈ ⑆056004089⑆ 652⑈0024669⑈

930409548884

DOLE FOR PRESIDENT COMMITTEE, INC.

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 WVO-3 V-2

DATE	DESCRIPTION	AMOUNT
8/17/93	Contribution Refund	$750.00

V-2

DOLE FOR PRESIDENT COMMITTEE, INC.
[illegible]

SIGNET BANK
Virginia
Vienna, VA

6314

August 17 19 93

68-408/560 405

PAY *Seven Hundred Fifty and 00/100********** DOLLARS $*750.00*

TO THE ORDER OF
United Supply Co.
2554 Lincoln Blvd, Suite 316
Marina Del Rey, CA 90291

James L. Hoge

⑈00006314⑈ ⑆056004089⑆ 652⑈00246699⑈

DELUXE CHECK PRINTERS

930409548885

DOLE FOR PRESIDENT
COMMITTEE, INC.

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 WVO-3 V-2

DATE	DESCRIPTION	AMOUNT
8/17/93	Contribution Refund	$1,000.00

V-2

DOLE FOR PRESIDENT COMMITTEE, INC.
[illegible]

SIGNET BANK
Vienna, VA Virginia

6315

August 17 19 93

68-408/560 405

PAY *One Thousand and 00/100********** DOLLARS $*1,000.00*

TO THE ORDER OF
Vaughn Organization
42 W. Lafayette Street
Trenton, NJ 08608

James L. Hagel

⑈00006315⑈ ⑆056004089⑆ 652⑈0024669⑈

DELUXE CHECK PRINTERS

930409548886

DOLE FOR PRESIDENT
COMMITTEE, INC.

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 WVO-3 V-2

DATE	DESCRIPTION	AMOUNT
8/17/93	Contribution Refund	$1,000.00

V-2

DOLE FOR PRESIDENT COMMITTEE, INC.

SIGNET BANK
Vienna, VA Virginia

6316

August 17 19 93

68-408/560 405

PAY *One Thousand and 00/100********** DOLLARS $*1,000.00*

TO THE ORDER OF
Veitas & Veitas Engineers
29 Foxhill Lane
Milton, MA 02186

James L. Hagel

⑈00006316⑈ ⑆056004089⑆ 652⑈0024669⑈

930409548887

OGC 9625

RECEIVED
FEDERAL ELECTION COMMISSION

93 AUG -6 PM 3:16

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CLOSED Aug. 6, 1993

TWO WAY MEMORANDUM

TO: OGC, Docket

FROM: Philomena Brooks PB
Accounting Technician

SUBJECT: Account Determination for Funds Received

We recently received a check from Campaign America, check number 462, dated August 5, 1993, and in the amount of $ 12,000.00. 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 $12,000.00, the MUR number is 3309 and in the name of Campaign America, Inc. 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

8-6-93
Date

23040954888

CAMPAIGN AMERICA

SENATOR BOB DOLE
Honorary Chairman

RECEIVED
FEDERAL ELECTION COMMISSION
93 AUG -6 PM 3:12

August 5, 1993

Mr. Lawrence M. Noble
General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 3309
Campaign America, Inc.
Judith F. Taggart,
As treasurer

Dear Mr. Noble:

In the above-identified matter/conciliation agreement, enclosed is Campaign America's check in payment of the civil penalty to the Federal Election Commission in the amount of Twelve Thousand Dollars ($12,000.00) pursuant to 2 U.S.C. sec. 437g(a)(5)(A).

If you have any questions, please contact me.

Sincerely,

Jo-Anne L. Coe

Mrs. Jo-Anne L. Coe
President & Executive Director

Enc.

23040954889

900 Second Street, N.E. Suite 118 Washington, D.C. 20002 202/408-5105 Fax 202/408-5117

Not mailed at Taxpayers' expense. Paid for by CAMPAIGN AMERICA.

402

CAMPAIGN AMERICA
~~[illegible]~~ 900 Second St., NE #118
WASHINGTON, D.C. 20002

August 5, 19 93 — 56-406/560 — 1463

PAY TO THE ORDER OF Federal Election Commission — $ 12,000.00

Twelve Thousand Dollars and 00/100---------- DOLLARS

SIGNET BANK
Virginia
Alexandria, VA

FOR _____

M. A. Hill
J. Anne L. Coe

⑈0000046 2⑈ ⑆056004089⑆ 652⑈0025500⑈

FEB 93

930409548 90

CLOSED

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Aug. 23, 1993

TWO WAY MEMORANDUM

TO: OGC, Docket

FROM: Philomena Brooks PB
Accounting Technician

SUBJECt: Account Determination for Funds Received

We recently received a check from Browning Ferris Industries, check number 427129, dated 8/17/93, and in the amount of $ 600.00. 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 $ 600.00, the MUR number is 3309 and in the name of Browning-Ferris Industries. 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

8-24-93
Date

23040954891

OLDAKER, RYAN & LEONARD
ATTORNEYS AT LAW
818 CONNECTICUT AVENUE, N.W.
SUITE 1100
WASHINGTON, D.C. 20006

(202) 728-1010
FACSIMILE (202) 728-4044

RECEIVED
FEDERAL ELECTION
COMMISSION
MAIN COPY ROOM
Aug 20 4 44 PM '93

August 20, 1993

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

RE: MUR 3309

Dear Mr. Noble:

Enclosed is the payment of the civil penalty in the above-referenced matter.

Sincerely,

Lyn Utrecht

Lyn Utrecht

2304095489 2

Mellon Bank (East) N.A., Philadelphia, PA
Payable through Mellon Bank (DE) N.A., Wilmington, DE

0260 BROWNING-FERRIS SERVICES, INC.
P.O. BOX 3151
HOUSTON TX 77253

CHECK NUMBER 09-4279129

4279129

62-4
311

Browning-Ferris Services
A SUBSIDIARY OF

BROWNING-FERRIS INDUSTRIES

P.O. BOX 3151 HOUSTON, TEXAS 77253

DATE	AMOUNT
08/17/93	********600.00

VOID AFTER 90 DAYS

PAY SIX HUNDRED AND NO/100 DOLLARS ******

TO THE ORDER OF
0260 D
FEDERAL ELECTION COMMISSION
WASHINGTON DC 20463

"4279129" :031100047: 2"927 077"

Browning-Ferris Services
A SUBSIDIARY OF

BROWNING-FERRIS INDUSTRIES

P.O. BOX 3151 HOUSTON, TEXAS 77253

0260 BROWNING-FERRIS SERVICES, INC.
P.O. BOX 3151
HOUSTON TX 77253

INVOICE NO.	DATE	VOUCHER	GROSS AMOUNT	DISCOUNT	NET AMOUNT	
4083	081693	475852	CIVIL PENALTY #MUR3309 #L9300996 600.00		600.00	

CHECK NO.	DATE	VENDOR NO.	VENDOR NAME	TOTAL AMOUNT
09-4279129	081793	095842296	FEDERAL ELECTION COMMISSION	600.00

9304095503

Prohibited Contributions

Under Section 441b of Title 2 of the United States Code, it is unlawful for any corporation to make a contribution or expenditure in connection with any election at which presidential and vice presidential electors or a Senator or Representative in, or a delegate or Resident Commissioner to, Congress are to be voted for, or in connection with any primary election or political convention or caucus held to select candidates for any of the forgoing offices, or for any candidate, political committee or other person knowingly to accept or receive any contribution prohibited by this section.

Section 100.7(A)(1)(iii) of Title 11 of the Code of Federal Regulations states that the term "contribution" includes a gift, subscription, loan, advance, or deposit of money or anything of value. The term "anything of value" includes all in-kind contributions. Unless specifically exempted under 11 C.F.R. §100.7(b), the provision of goods or services without charge or at a charge which is less than the usual and normal charge for such goods or services is a contribution.

Section 103.3(b)(1) states that, contributions that present genuine questions as to whether they were made by corporations may be, within ten days of the Treasurer's receipt, either deposited into a campaign depository or returned to the contributor. If any such contribution is deposited, the Treasurer shall make his or her best efforts to determine the legality of the contribution. If the contribution cannot be determined to be legal, the Treasurer shall, within thirty days of the Treasurer's receipt of the contribution, refund the contribution to the contributor.

Section 103.3(b)(4) states that any contribution which appears to be illegal and which is deposited into a campaign depository shall not be used for any disbursements by the political committee until the contribution has been determined to be legal. The political committee must either establish a separate account in a campaign depository for such contributions or maintain sufficient funds to make all such refunds.

Receipt of Contributions from Corporations

The Audit staff reviewed the Committee's contribution records for the period February 1987 through April 30, 1988, and identified 250 contributions from corporations totaling $75,771.08, which were not refunded or not refunded in a

timely manner.*/ Included in this total are three in-kind contributions, totaling $3,820.82.

The first in-kind was related to a $12,000.00 payment the Committee made to an air charter company for air travel. According to documentation from the Committee's vendor files, the $12,000.00 charge "represented a discount from the standard fare of $14,750.00" and "was arrived at to compromise between the above figure [$14,750.00] and the "partners" price which would have been $9,800.00." The auditors concluded that the Committee had received an in-kind contribution from the air charter company in the amount of $2,750 ($14,750.00 - $12,000.00) which is the difference between the normal charge for this service and the amount paid by the Committee.

The second in-kind was related to a $9,905.00 reimbursement to a corporation for use of a private airplane. The Committee withheld $1,000.00 of the actual $10,905.00 cost of this rental due to the $1,000.00 transportation expense exemption from the definition of contribution allowed by 11 C.F.R. §100.7(b)(8).

The auditors verified that the actual cost of this rental was $10,905.00. However, it is our opinion that 11 C.F.R. §100.7(b)(8) applies to individuals, not to corporations. (Also see Exhibit B for further discussion of this item.)

The third in-kind was related to a $70.82 charge on Elizabeth Dole's Committee credit card for four rooms and telephone charges at an Iowa motel. The documentation for this charge in the Committee's vendor files contained a notation that one-half was donated by an Iowa company. Since this company was incorporated, the Audit staff concluded that an in-kind corporate contribution had resulted in the amount of $70.82.

Of the 250 corporate contributions discussed above, the Audit staff identified 25 refunds totaling $7,201.00, which were not made timely. In the Interim Audit Report, it was noted that 10 of the 25 refunds not made in a timely manner were determined from the disclosure reports and needed audit verification (i.e., copies of the front and back of the negotiated refund checks). These 10 items are noted on Attachment #1.

*/ Section 103.3(b) of the Code of Federal Regulations was amended effective April 8, 1987. However, it is the opinion of the Audit staff that these contribution refunds were not made within a reasonable time as required by the previous regulation.

2304095530 4

A separate account was not established by the Committee for deposit of possible illegal contributions. However, the Audit staff reconciled the Committee's bank accounts to disclosure reports for the period February 1987 (inception) through April 1988. The misstatements in financial activity were immaterial. The reported ending cash balances were as follows:

Report Period	Ending Balance*/
Inception - 3/31/87	$ 208,742.71
4/1/87 - 6/30/87	1,685,502.24
7/1/87 - 9/30/87	2,214,821.68
10/1/87 - 12/31/87	2,208,682.83
1/1/88 - 1/31/88	4,153,698.85
2/1/88 - 2/29/88	836,445.98
3/1/88 - 3/31/88	374,415.37
4/1/88 - 4/30/88	519,912.58

Based on these ending cash balances, it appears that the Committee maintained sufficient funds to make any necessary refunds.

The Committee was provided with a schedule of the corporate contributions.

In the Interim Audit Report, the Audit staff recommended that the Committee either submit evidence demonstrating that these contributions were not received from corporations, or refund the $68,570.08 ($75,771.08 - $7,201.00) in prohibited contributions and present evidence of such refunds (i.e., copies of the front and back of the negotiated refund checks). In addition, it was recommended that copies of refund checks be submitted for the 10 unverified refunds.

The Audit staff further recommended that the Committee provide additional information relating to the second in-kind discussed above ($1,000) including the circumstances surrounding the payment, the identity of the passenger(s), whether the passengers were volunteers and an explanation of why the Committee applied the volunteer exemption to this payment.

*/ Also see Exhibit C., Apparent Excessive Contributions.

23040955305

In the Committee's response to the Interim Audit Report, the Committee Treasurer addresses each of the three in-kind contributions mentioned in this finding. He contends that the first in-kind ($2,750), which was related to a $12,000 payment for a chartered aircraft payment, was not a reduction from the fair market value for the services provided.

The Treasurer explains that a dispute arose between the Committee and the charter company when the Committee was billed a higher amount than was originally estimated. He adds that letters were exchanged and eventually the amount originally billed, $12,000, was paid by the Committee.

The Treasurer notes that although a memo dated April 7, 1988 to the Committee from the charter company states that the billing represented a discount from the standard fare of $14,750, the Committee believes that the $12,000 easily meets fair market value for the services provided. He continues that "...[t]he fact that in negotiating terms, a company states that it is giving a campaign a break does not mean that it, in fact, has given the campaign a break outside the normal course of business."

The Treasurer concludes that "[u]nless the auditors believe that $12,000 was too little and has evidence other than an attributed comment made as part of a business negotiation, DFP*/ stands by its claim that it paid fair market value."

It is the opinion of the Audit staff that the memo dated April 7, 1988 to the Committee from a representative of the charter company contains enough information to question whether the $12,000 paid for the charter service was the usual and normal charge for such services. In this memo, a Ms. Price, who according to a letter to the Committee dated April 26, 1988 was the controller of the charter company, was quoted as stating that the $12,000 "...represented a discount from the standard fare of $14,750.00" and "...was arrived at to compromise between the above figure [$14,750.00], and the 'partners' price which would have been $9,800.00." The documentation also suggests that the increase in cost which appears to be the cause of the dispute was due to additional flights ordered after the company had given the Committee a price estimate.

The Treasurer contends that the second in-kind ($1,000), which was related to the Committee's deduction of $1,000 from a $10,905.00 payment to a corporation for use of an aircraft, was permissible pursuant to 11 C.F.R. §100.7(b)(8) because an individual personally paid for the use of the aircraft. He further states that the fact the check went through the corporate account does not preclude the possibility that the individual paid for the aircraft from personal funds.

*/ DFP refers to the Dole for President Committee.

9304095530 6

It is the opinion of the Audit staff that without documentation to support the Committee's contention that an individual paid for these transportation services from his personal funds while engaging in activity on behalf of the Committee, the Committee has accepted a $1,000 contribution in-kind from a corporation.

The Treasurer states that the third in-kind, which was related to a $70.82 charge on Elizabeth Dole's Committee credit card for an Iowa hotel bill, was paid for by an individual since they had no evidence that a corporation made this payment. The Audit staff concurs with the explanation provided by the Committee for this item and has deleted this item from the finding.

In the Committee's response to the Interim Audit Report, the Treasurer states that "[t]he Audit staff believes it has found roughly 250 corporate checks out of the 162,000 checks received by DFP. DFP notes that it returned over 600 checks without depositing them and refunded many more once it was unable to obtain the necessary verification from the contributor as to the source of the funds."

Included in the Committee's February 12, 1990 response is a discussion of a preliminary review of the apparent corporate contributions and a request for additional time to search through their contribution records to locate contributor verification letters related to these items. The Committee's explanation of their preliminary review includes a breakdown into four groups.

The first group is for contributor checks which the Committee believes on their face are not corporate. The second group is for contributor checks for which partnership letters are attached. The third group is for contributor checks which the Committee believes are not from corporate entities because of a combination of the face of the check and standard banking procedure. The fourth group is for checks the Committee concedes are probably corporate.

The "standard banking procedure" referred to by the Committee for the third group of contributor checks was that "[t]he micro coding on the bottom of each check gives the bank routing number, account number and check number. If the check number is centered or right justified, then it was more than likely opened as a personal account. If the check number is left justified, it was more than likely opened as a business account." The Audit staff contacted a representative of the American Bankers Association - Standards Division who, after conferring with "experts in the field," stated that the micro code location of the check number has no bearing on the type of account.

9304095530 7

On April 13, 1990, the Committee submitted photocopies of contributor letters related to some of the apparent corporate contributions noted in this finding. These letters, signed by the contributors, indicate that the funds were personal rather than corporate. From both responses combined, the Committee provided letters for 84 items.

Of the 250 apparent corporate items, totaling $75,771.08, noted in the Interim Audit Report, the Committee has provided documentation in their response to the report and in their April 13, 1990 response for 116 contributions, totaling $32,953.76. This documentation consisted of either contributor letters or check copies.

After considering the response, the Audit staff has deleted 37 contributions totaling $7,492.70. Included in the remaining apparent corporate contributions are 61, totaling $21,686.88, for which the Committee has submitted signed statements from the contributor indicating that the contributions were made from personal funds. However, these statements are in conflict with information obtained from various Secretaries of State and do not provide any other information that demonstrates a non-corporate source for the funds. Given this conflicting information, the Audit staff must rely upon the information provided by the independent source and consider the signed statements as mitigating factors.

The Committee concedes that 11 of the 250 contributions noted in the finding, totaling $1,977.00, are "probably corporate." However, no evidence of any refunds was included in the response or noted in the Committee's disclosure reports for these items.

In summary, the Audit staff has identified 213 (250 minus 37) contributions from corporations, totaling $68,043.38 ($75,771.08 - $7,727.70), which were not refunded or not refunded in a timely manner (see Attachment 1). Included in this total are the two in-kind contributions discussed earlier, totaling $3,750 ($2,750 + $1,000), 61 contributions, totaling $21,686.88, for which signed personal funds statements have been provided, and 25 contribution refunds, totaling $7,201.00, not made in a timely manner. Contributions from corporations not refunded total $60,842.38 ($68,043.38 - $7,201.00).

In the Interim Audit Report, the Audit staff requested that the Committee provide copies of the front and back of the negotiated refund checks for 10 of the 25 refunds ($2,763.00) which had been determined from the disclosure reports and needed audit verification. These copies were not provided.

23040955308

Recommendation #1

The Audit staff recommends that pursuant to the Commission approved Materiality Thresholds, this matter be referred to the Commission's Office of General Counsel.

23040955307

Exhibit A
Attachment 1
Page 1 of 13

Listing of Possible Corporate Contributors by corporate name--Dole Run Date: 06/07/1990 Page: 1

Batch Number	Business Name / Last Name	First Name	M I.	Deposit Date	Address 1 / Contribution Amount	Incorp Date	Address 2 / IID	City	State	Zip	Refund Information Date	Refund Amount	# of Days
12835	AD ASTRA, LTD.				RT 1 BOX 92LLL								
	LEONARD	RAYMOND	S	03/31/1988	25.00	12/15/1986	574	SANTA FE	NM	87501			
11157	AIR MARINE CARGO SERVICES, D/B/A/ MAC CARGO SERVICES			02/11/1988	6856 NW 77TH COURT 34.00	12/29/1981	814	MIAMI	FL	33166			
8261	AL ADAMS RARE COINS, INC.				ABERNATHY SQ., 6433 C ROSWELL ROAD			ATLANTA	GA	30328			
	SIKES	CELESTE	D	11/30/1987	50.00	11/04/1980	285						
11107	ALMAR ASSOCIATES, INC.				16 HOLLY COURT								
	SIEGEMFUS	ALLEN	R	02/10/1988	25.00	10/09/1980	798	WOODCLIFF LAKE	NJ	07675			
999879	ALTMAN BROTHERS				115 NEW STREET								
				12/31/1987	1,000.00	08/02/1955	450	GLENSIDE	PA	19038	6/17/88	$2,000.00*	12/31/87-6/17/88 169
9617	AMERICAN GENEALOGICAL LENDING LIBRARY			12/30/1987	P.O. BOX 244 25.00	05/05/1983	329	BOUNTIFUL	UT	84010			
12126	AMERICAN GENEALOGICAL LENDING LIBRARY				P.O. BOX 244								
	STEUART	RAEONE		01/04/1988	15.00	05/05/1983	581	BOUNTIFUL	UT	84010			
9928	AMERICAN STANDARD APPLIANCE PROTECTION OF COLORADO SPRINGS				4125 NORTH CARE FREE			COLORADO SPRINGS	CO	80917			
	STARKEY	DELFRED	J	01/06/1988	25.00	01/03/1986	366						
7261	AMERICAN STANDARD APPLIANCE PROTECTION OF COLORADO SPRINGS				4125 N. CARE FREE			COLORADO SPRINGS	CO	80917			
	STARKEY	DELFRED	J	11/05/1987	25.00	01/03/1986	626						
10925	AMERICAN STANDARD APPLIANCE PROTECTION OF COLORADO SPRINGS				4125 NORTH CARE FREE			COLORADO SPRINGS	CO	80917			
	STARKEY	DELFRED	J	02/04/1988	25.00	01/03/1986	1000						
6927	ANDREW HEYL, P.A., ATTORNEY AT LAW				11900 WEST 87TH ST.,SUITE 210			LENEXA	KS	66215			
	HEYL	ANDREW		10/30/1987	150.00	04/10/1986	1450						
3636	BALLET LIMITED PARTNERS				1621 N. OLDEN AVENUE								
				08/14/1987	1,000.00	07/22/1986	1565	TRENTON	NJ	08638			
6559	BERNARD SUSSMAN, M.D.				40 N. PAULINE								
	SUSSMAN	BERNARD	M	10/23/1987	100.00	04/07/1972	876	MEMPHIS	TN	38105			
9752	BERTRAM ASSOCIATES				1001 BERTRAM TERRACE								
				12/31/1987	2,000.00	12/28/1983	313	UNION	NJ	07083			
10973	BRUCE W. SOLOMON, D.C., P.A.				3401 FLAGLER AVE								
	SOLOMON	B.W.		02/05/1988	115.00	01/19/1981	1002	KEY WEST	FL	33040			
6852	C. EDOUARD ST. MARTIN ASSOCIATES, INC.				156 RUSSELL ST.								
	ST. MARTIN	J. EDWARD		10/28/1987	500.00	01/02/1982	912	WORCESTER	MA	01609	2/15/88	$500.00	10/28/87-2/15/88 110

O - Committee has submitted signed contributor statements indicating source as personal funds.

* Unverified refund

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Batch Number	Business Name / Last Name	First Name	M I.	Deposit Date	Address 1 / Contribution Amount	Incorp Date	IID	Address 2	City	State	Zip			
12917	CAPITAL CITY CREDIT UNION PARKER	GILBERT	R	04/11/1988	1800 HARRISON 120.00	07/24/1974	583		TOPEKA	KS	66612			
7044	CEDAR HILL RESORT ROBERTS	R.I.		11/03/1987	ROUTE 1 20.00	06/18/1959	668		CELINA	TN	38551	6/28/88	20.00*	11/3/87-6/28/88 238
7617	CHARLES E. HANAWEY ROOFING COMPANY BOYD	MICHAEL	L	11/13/1987	1953 OHIO 250.00	06/09/1931	1376		WICHITA	KS	67214			
7410	CITIZENS ACTION TEAM * . D		R	11/09/1987	P.O. BOX 692 100.00	01/09/1987	1307		STONE MOUNTAIN	GA	30086			
3636	CLINTON COMMONS ASSOCIATES			08/14/1987	1621 N. OLDEN AVENUE 1,000.00	04/12/1985	1569		TRENTON	NJ	08638			
7203	COLONIAL CARPETS OLSON			11/05/1987	28 HARLOW ST. 15.00	03/18/1977	687		BANGOR	ME	04401			
6835	COLONIAL CARPETS			10/28/1987	28 HARLOW ST. 15.00	03/18/1977	906		BANGOR	ME	04401			
11597	COLUMBIA MANAGEMENT HERRMANN	SANDRA	L	02/23/1988	137 WASHINGTON STREET 200.00	08/17/1977	447		NORWELL	MA	02061			
5682	COLUMBIA MANAGEMENT HERRMANN	SANDRA	L	09/30/1987	137 WASHINGTON STREET 300.00	08/17/1977	1195		NORWELL	MA	02061			
11883	COMMITTEE FOR HUMANE LEGISLATION, INC. FERAL	PRISCILLA		02/29/1988	11 WEST 60TH STREET 1,000.00	03/03/1967	24		NEW YORK	NY	10023			
12304	COMPUTER MANAGEMENT SERVICES CO. GRUMBINE	LUKE		03/10/1988	1,000.00	12/15/1978	515		NEW CUMBERLAND	PA				
10240	CT CARNEY INVESTMENT CO. CARNEY, JR.	CT		01/15/1988	NO. 8 TARA MOUNT 20.00	01/30/1953	1335		JACKSONVILLE	AR	72076	4/28/88	20.00	1/15/88-4/28/88 104
5913	D & D INVESTMENTS GULLEY	DONALD	R	10/09/1987	2941 SOUTH FAIRWAY DRIVE 25.00	05/28/1986	1274		TEMPE	AZ	85282			
2414	D-J COMPANY, THE FIRST PLACE DODSON	H.	J	07/15/1987	6821 EAST KELLOGG 1,000.00	04/24/1974	1585		WICHITA	KS	67207			
2414	DANIEL H. CASE, A LAW CORPORATION CASE	DANIEL	H	07/15/1987	2040 AHUALANI PLACE 100.00	04/01/1980	22		HONOLULU	HI	96809	1/29/88	$100.00	7/15/87-1/29/88 198
	DANIEL L. TEDESCO, P.A., ATTORNEY AT LAW - GENERAL ACCOUNT TEDESCO	DANIEL	L	04/08/1987	320 SE 9TH STREET 250.00	03/14/1984	342		FT. LAUDERDALE	FL	33316			
12148	DENCO-B LTD. BRUBN	DENNIS	B	03/04/1988	100.00	12/14/1978	1113		SCHLESWIG	IA	51461			
10635	DENNIS L. DOUGLAS, ATTORNEY AT LAW DOUGLAS	DENNIS	L	01/27/1988	501 LINCOLN BLDG 50.00	07/01/1980	956		SPOKANE	WA	99201			

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Batch Number	Business Name	Last Name	First Name	M I	Deposit Date	Contribution Amount	Address 1	Incorp Date	Address 2 / IID	City	State	Zip			
11110	DISCALCED CARMELITE MONASTERY	TERESA	MOTHER MARY		02/10/1988	75.00	2201 WEST MAIN STREET	07/25/1983	808	JEFFERSON CITY	MO	65101			
6813	DISCALCED CARMELITE MONASTERY	SR. MARY TERESA			10/26/1987	32.00	2201 WEST MAIN STREET	07/25/1983	1432	JEFFERSON CITY	MO	65101			
1381	DR. FAISSAL ZAHRAWI				06/17/1988	50.00	36100 EUCLID ST. 360	06/11/1979	1590	WILLOUGHBY	OH	44094			
6832	DUFFY CONSTRUCTION COMPANY	DUFFY	DORIS		10/28/1987	25.00	P.O. BOX 42	05/18/1976	1436	THE DALLES	OR	97058	6/28/88	25.00*	10/28/87-6/28/88 244
8821	DURHAM FUNERAL HOME	DURHAM	JAMES	S	12/10/1987	100.00	205 KENTUCKY AVENUE	06/19/1963	1342	PINEVILLE	KY	40977			
8127	E. G. MUSLEH, ATTORNEY AT LAW	MUSLEH	E	G	11/24/1987	200.00	P.O. BOX 924	02/23/1970	1365	OCALA	FL	32678			
6557	EARL D. MERKEL, M.D.				10/23/1987	75.00	SNIELDS BLDG.	01/16/1970	873	RUSSELL	KS	67665			
4963	EAST STATE STREET ASSOC. LP	ILLEGIBLE			09/22/1987	1,000.00	1621 OLDEN AVENUE, N	01/15/1987	1244	TRENTON	NJ	08638			
5399	EDWARD WHITE & CO.	WHITE	EDWARD		09/30/1987	1,000.00	5950 CANOGA AVENUE, SUITE 200	10/02/1980	1178	WOODLAND HILLS	CA	91367			
6658	EDWIN D. RATHBUN, M.D., F.A.A.F.P., F.A.				10/26/1987	50.00	610 WEST ELEVENTH ST.	05/22/1973	882	LIBERAL	KS	67901			
7284	ELBERT EXTERMINATING CO.	ELBERT	ED	A	11/05/1987	29.00	P.O. BOX 4066	05/03/1982	1303	WINTER PARK	FL	32793	6/28/88	$29.00*	11/5/87-6/28/88 236
707	EMMETT B. REILLY, M.D.	REILLY	EMMETT	B	05/22/1987	25.00	7000 ARIZONA	10/21/1974	91	LOS ANGELES	CA	90045			
12114	EMMETT B. REILLY, M.D.	REILLY	EMMETT	B	03/14/1988	20.00	7000 ARIZONA	10/21/1974	496	LOS ANGELES	CA	90045			
11712	ERIC W. FONKALSRUD, M.D.	FONKALSRUD	ERIC	W	02/24/1988	100.00	428 24TH ST.	12/28/1979	1089	SANTA MONICA	CA	90402			
3965	F.D. KERS MANUFACTURING COMPANY	SCHAEFER	GEO.		08/21/1987	30.00	700-800 PARK AVENUE	02/28/1947	1141	BEATRICE	NE	68310			
1196	F.E. SCHAFFER, D.D.S., ORAL AND MAXILLO FACIAL SURGEON	SHAFFER	F.E.		06/11/1987	50.00	2602 CUNNINGHAM	10/04/1985	381	JOPLIN	MO	64801			
10157	FAIR LANE FARMS	ROGERS	W	E	01/13/1988	25.00	R.R. 4, BOX 224	01/05/1971	346	MT. PLEASANT	IA	52641			
7044	FORMS MANAGEMENT	OSBORNE	JOHN	R	11/03/1987	50.00	P.O. BOX 1312	03/08/1979	670	WICHITA	KS	67201			

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Batch Number	Business Name / Last Name	First Name	M I.	Deposit Date	Address 1 / Contribution Amount	Incorp Date	Address 2 / IID	City	State	Zip
7795	G & L FARMS, INC.				1113 NORTH COMMANCHE, BOX 54			ULYSSES	KS	67880
	AKAGI	GENO		11/17/1987	25.00	12/11/1975	1396			
6298	G. J. "PETE" DANHOFF, O.D.				415 SECOND STREET			IDA GROVE	IA	51445
	DANHOFF	PETE		10/19/1987	50.00	04/22/1987	1286			
12950	G.C. MORROW, D.D.S.				100 FIFTH AVE., SUITE 1105			PITTSBURGH	PA	15222
	MORROW	G.C.		04/15/1988	50.00	09/17/1971	588			
10523	G.C. MORROW, D.D.S.				100 FIFTH AVE., SUITE 1105			PITTSBURG	PA	15222
	MORROW	G.C.		01/25/1988	100.00	09/17/1971	767			
1352	G.C. MORROW, D.D.S.				100 FIFTH AVENUE, SUITE 1105			PITTSBURGH	PA	15222
	MORROW	G.C.		06/16/1987	100.00	09/17/1971	1483			
1432	GEORGE ESCHBAUGH ADVERTISING				BOX 130			WILSON	KS	67490
				06/18/1987	600.00	07/21/1975	388			
999676	GIBSON DEAN II, P.C., ATTORNEY AT LAW				P.O. BOX 939			BUFORD	GA	30518
	DEAN	DIANE	J	12/31/1987	30.00	08/12/1985	631			
12347	GILBERT S. SMALL, D.D.S., ORAL AND MAXILLOFACIAL SURGERY				1303 PACKARD			ANN ARBOR	MI	48104
	SMALL	GILBERT	S	03/11/1988	100.00	03/29/1972	519			
2680	GIVENS CONSTRUCTION				P.O. BOX 19576			LOS ANGELES	CA	90019
	GIVENS	ERIC		07/23/1987	100.00	10/30/1986	1532			
10943	GLICKENHAUS & CO.				6 EAST 43RD STREET			NEW YORK	NY	10017
				02/05/1988	1,000.00	06/15/1963	785			
999930	GREAT PLAINS UROLOGY, PA				3520 LAKIN, SUITE 108			GREAT BEND	KS	67530
	BEAR	VICKI		03/25/1987	100.00	09/29/1983	1471			
12739	GRODAHL FARMS				BOX 136			LITTON	IA	50561
	GRODAHL	RODNEY		03/28/1988	1,000.00	05/18/1982	1380			
11683	GUARDIAN TITLE AGENCY				P.O. BOX 6817			LAWRENCEVILLE	NJ	08648
	GREEN	DAVID		02/29/1988	1,000.00	11/30/1977	37			
	H & W AVIATION				9400 NORTH BROADWAY #700	IN-KIND		OKLAHOMA	OK	73114
					2,750.00	08/30/1983	1596			
11131	H. FREDERICK REIBER, M.D.				P.O. BOX 2324			WINTER HAVEN	FL	33883
	REIBER	H. FREDERICK		02/11/1988	5.00	10/01/1976	1015			
6835	H.H. BLAIR OIL COMPANY				LAZY B. RANCH			ATLANTA	KS	67008
	BLAIR	BETTY		10/28/1987	50.00	12/22/1980	902			
12225	H.L. COMPTON, M.D.				880 CASS ST. STE. 209			MONTEREY	CA	93940
	COMPTON	H.L.		03/08/1988	50.00	07/21/1977	510			

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Batch Number	Business Name / Last Name	First Name	M I	Deposit Date	Address 1 / Contribution Amount	Incorp Date	Address 2 / IID	City	State	Zip				
3192	HARRY E. WEBB, M.D.				4400 BROADWAY, SUITE 502			KANSAS CITY	MO	64111				
WEBB		HARRY		07/14/1987	250.00	09/28/1971	412							
11591	HARRY E. WEBB, M.D.				4400 BROADWAY, SUITE 502			KANSAS CITY	MO	64111				
WEBB		HARRY	E	02/29/1988	250.00	09/28/1971	464							
6641	HARRY E. WEBB, M.D.				4400 BROADWAY, SUITE 502			KANSAS CITY	MO	64111				
WEBB		HARRY	E	10/26/1987	500.00	09/28/1971	881							
7451	HARRY L. MANNING, M.D., ASSOC., OFFICE ACCOUNT				699 RURAL AVENUE			WILLIAMSPORT	PA	17701	2/15/88	$25.00	11/9/87-2/15/88	98
MANNING		HARRY	L	11/09/1987	25.00	07/01/1982	75							
11648	HERREID AGENCY				SUITE NO. 3, 11 BRIDGE SQUARE			NORTHFIELD	MN	55057				
HERREID		JAMES		02/24/1988	10.00	07/01/1976	1073							
9047	HUGHES ENTERPRISES				P.O. BOX 35887			TULSA	OK	74153				
BAILEY		VICKI	C	12/16/1987	500.00	05/12/1982	1339							
11107	INTERADD OF NEW HAMPSHIRE				WOODMAN ROAD			SOUTH HAMPTON	NH	03827				
WALLEM		LUTE	M	02/10/1988	60.00	11/05/1987	797							
12304	INVESTORS DEVELOPMENT GROUP				1013 MUMMA ROAD			MORMLEYSBURG	PA	17043				
ADAMS		GEORGE	J	03/10/1988	500.00	03/04/1981	516							
11501	J & J INVESTMENTS				1016 MARCIE LANE			MILFORD	OH	45150				
RAMSBAUER		JOY ANNE		02/22/1988	29.00	06/05/1985	1057							
11488	J.A. JAMES CONSTRUCTION CO.				P.O. BOX 2313			IRWINDALE	CA	91706	6/28/88	$100.00*	2/19/88-6/28/88	130
HALMERSAN		JAMES'	A	02/19/1988	100.00	06/08/1984	840							
	J.W. (JACK) HUTT CO.				P.O. BOX 798			NORTH LITTLE ROCK	AR	72115				
HUTT		J	W	04/08/1987	250.00	11/08/1973	341							
2463	J.W. (JACK) HUTT CO.				P.O. BOX 798			NORTH LITTLE ROCK	AR	72115				
HUTT		JEAN	L	07/15/1987	200.00	11/08/1973	416							
4976	J.W. (JACK) HUTT CO.				P.O. BOX 798			NORTH LITTLE ROCK	AR	72115	12/21/87	400.00	9/22/87-12/21/87	90
HUTT		J	W	09/22/1987	400.00	11/08/1973	1152							
3945	J.W. (JACK) HUTT CO.				P.O. BOX 798			NORTH LITTLE ROCK	AR	72115	11/24/87	75.00	8/21/87-11/24/87	95
HUTT		JOAN		08/21/1987	500.00	11/08/1973	1227							
422	JAMES A. HOLLIDAY,M.D.,P.A.				4700 W.NABANA AVE.			TAMPA	FL	33614				
				05/11/1987	50.00	05/25/1984	683							
7904	JAMES M. BALLIRO, M.D., P.A.				1892 BUFORD BOULEVARD			TALLAHASSEE	FL	32308				
BALLIRO		JAMES	M	11/19/1987	48.00	04/30/1985	182							
30	JAMES P. RYAN, PA				320 SOUTHEAST 9TH STREET			FT. LAUDERDALE	FL	33316				
RYAN		JAMES	P	04/08/1987	250.00	02/10/1982	309							
11611	JEROME D. FLADEN, M.D.				1330 TIMKEN MERCY DR. N.W. #310			CANTON	OH	44708				
FLADEN		JEROME		02/23/1988	35.00	07/01/1972	1591							

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Batch Number	Business Name				Address 1		Address 2	City	State	Zip				
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541	JEROME D. FLADEN, M.D.				1130 TIMKEN MERCY DR. N.W. #310			CANTON	OH	44708				
				05/15/1987	35.00	07/01/1972	1592							
8960	JIM TRAMP CONSTRUCTION				2608 MULBERRY			YANKTON	SD	57078				
TRAMP		JIM		12/15/1987	25.00	09/15/1972	1341							
4146	JIM'S PHARMACY P.A., MOWERY CLINIC				737 EAST CRAWFORD			SALINA	KS	67401	10/30/87	$ 50.00	8/26/87-10/30/87	65
CRAM		JAMES		08/26/1987	50.00	03/18/1986	1586							
11170	JOE L. NORTON, P.A.				ONE MAIN PLACE, SUITE 800			WICHITA	KS	67202	9/26/88	1,000.00	2/12/88-9/26/88	227
NORTON		JOE	L	02/12/1988	1,000.00	12/30/1982	811							
11478	JOHN GARDNER FARMS				ROUTE 1, BOX 327			LAMAR	MO	64759				
GARDNER		JOHN		02/19/1988	50.00	04/17/1975	842							
7243	JOHN M. YOUNG, M.D., P.A.				8220 TRAVIS, SUITE 115			OVERLAND PARK	KS	66204				
YOUNG		A	B	11/05/1987	250.00	12/31/1973	1299							
5383	JOSEPH A. LOTA, D.D.S., P.A.				163 DAYTON STREET			RIDGEWOOD	NJ	07450				
LOTA		JOSEPH	A	09/30/1987	100.00	08/21/1974	1174							
11345	KENNETH E. HOFF, M.D.				816 MAIN STREET			ROCHESTER	IN	46975				
HOFF		KEN		02/18/1988	100.00	08/01/1984	821							
999954	KEY ENTERPRISES				5501 COMANCHE			GREAT BEND	KS	67530				
ROGERS		R.R.		03/17/1987	100.00	09/16/1976	1479							
9161	KILBOURNE INVESTMENT COMPANY				1465 JUNIPER HILL ROAD			POCATELLO	ID	83204				
MCLAIN		JUDI		12/16/1987	50.00	08/12/1970	144							
4631	KMIK INTERNATIONAL COLOR LTD				111 8TH AVENUE			NEW YORK	NY	10011				
?				09/11/1987	1,000.00	02/23/1971	1234							
12775	L.P. REED RANCH				BOX 557			MERIDIAN	TX	76665				
REED		JESSIE	H	03/29/1988	40.00	12/19/1973	1393							
2645	LAUREN E. WELCH, M.D.				3243 E. MURDOCK, SUITE 601			WICHITA	KS	67208				
WELCH		LAUREN	E	07/22/1987	750.00	06/26/1980	420							
8364	LAW OFFICES OF RICE & REISER, P.A.				1350 NORTHWEST 18TH AVENUE			MIAMI	FL	33125	9/26/88	100.00	12/1/87-9/26/88	300
UNKNOWN				12/01/1987	100.50	08/06/1985	1358							
11853	LE TRIANON JEWELRY				CENTRAL SHOPPING PL. 3807 NW 7TH ST			MIAMI	FL	33126				
CURI		A.		02/26/1988	20.00	05/23/1984	58							
8522	LESLIE ENTERPRISES				P.O. BOX 4454			SATICOY	CA	93004				
LESLIE		ROBERT	Q	12/04/1987	1,000.00	10/04/1974	155							

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Batch Number	Business Name / Last Name	First Name	MI	Deposit Date	Address 1 / Contribution Amount	Address 2 / Incorp Date	IID	City	State	Zip				
2614	LIDA ADVERTISING COMPANY LIDA	BOB		07/15/1987	393 N. MCLEAN BOULEVARD 1,000.00	12/27/1978	17	WICHITA	KS	67203	9/30/87	$1,000.00	7/15/87-9/30/87	77
7196	LOS ANGELES DRYWALL			11/04/1987	3940 GILMAN STREET 1,000.00	01/02/1987	603	LONG BEACH	CA	90815				
999996	LYNN D. KETCHUM, M.D. KETCHUM	LYNN	E	02/18/1987	12301 WEST 106TH, SUITE 201 250.00	09/26/1978	655	OVERLAND PARK	KS	66215				
5098	M-3 ASSOCIATES JORDEN	MARK		09/24/1987	1,000.00	01/03/1985	1248	NEW YORK	NY	10022				
10910	MANDARIN PHARMACY			02/04/1988	895 WASHINGTON ST. 35.00	04/15/1970	783	SAN FRANCISCO	CA	94108				
7461	MARKO ENTERPRISES SWEENEY	MARK		11/10/1987	P.O. BOX 90859 20.00	09/04/1979	706	SANTA BARBARA	CA	93190				
9879	MARTIN W. TAPLIN, ATTORNEY AT LAW TAPLIN	MARTIN	W	01/06/1988	1,000.00	04/28/1986	1579	MIAMI	FL					
8261	MAX E. OLTJEN LAND & CATTLE CO. OLTJEN	MARILYN		11/30/1987	BOX 265 50.00	10/13/1975	1336	HIAWATHA	KS	66434				
970	MCCARTHY & MCCARTHY MCCARTHY	MELANIE	R	06/02/1987	1980 NORTH ATLANTIC AVE.,SUITE 1036 25.00	10/22/1984	1595	COCOA BEACH	FL	32931	1/29/88	25.00	6/2/87-1/29/88	241
5138	MCVEAN AND COMPANY ?			09/25/1987	650 RIDGE LAKE BLVD, SUITE G-01 1,000.00	07/25/1986	1157	MEMPHIS	TN	38119				
12687	MEEKS MANAGEMENT CO. MEEKS	BILLY		03/23/1988	P.O. BOX 2971 45.00	02/05/1987	546	LUBBOCK	TX	79408				
7261	MICHAEL M. BARBARICH, M.D., P.C. BARBARICH	M		11/05/1987	P.O. BOX 700 100.00	07/21/1975	64	ESCANABA	MI	49829	4/15/88	100.00	11/5/87-4/15/88	162
2145	MIHALIC PROPERTIES MIHALIC	OLGA	M	06/10/1987	5380 OBERLIN AVE. 35.00	07/07/1983	380	LORAIN	OH	44053				
999954	MILLER RANCH MILLER	TIM		03/17/1987	115 PATTON RD. 100.00	07/01/1976	1472	GREAT BEND	KS	67530				
7196	MILLER, CANFIELD, PADDOCK AND STONE			11/04/1987	2500 COMERICA BUILDING 1,000.00	04/15/1987	63	DETROIT	MI	48226				
5138	MILTON PENSTER ASSOCIATES PENSTER	MILTON		09/25/1987	540 MADISON AVENUE 1,000.00	04/30/1970	1253	NEW YORK	NY	10022				
213	MODERN DEVELOPMENT CO. RAMSOM	DONALD		04/28/1987	7803 E. SOMERSET BLVD 250.00	04/19/1983	344	PARAMOUNT	CA	90723				

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Batch Number	Business Name / Last Name	First Name	MI	Deposit Date	Address 1 / Contribution Amount	Address 2 / Incorp Date	City	State	Zip			
12588	MODERN DEVELOPMENT CO.				7803 E. SOMERSET BLVD.		PARAMOUNT	CA	90723			
	RAMSOME	DONALD	J	03/10/1988	250.00	04/19/1983 533						
9118	MODERN DEVELOPMENT CO.				7803 E. SOMERSET BLVD.		PARAMOUNT	CA	90723			
	RAMSOM	DONALD	J	12/17/1987	100.00	04/19/1983 746						
11478	MODERN DEVELOPMENT CO.				7803 E. SOMERSET BLVD.		PARAMOUNT	CA	90723			
	RAMSOM	DONALD		02/19/1988	100.00	04/19/1983 837						
10674	MODERN DEVELOPMENT CO.				7803 E. SOMERSET BLVD.		PARAMOUNT	CA	90723			
	RAMSOM	DONALD		01/28/1988	250.00	04/19/1983 838						
5389	M.H. BETTIGOLE CO., CONSULTNG ENGINEERS				601 BERGEN MALL		PARAMUS	NJ	07652			
	BETTIGOLE	M.	M	09/30/1987	500.00	01/08/1979 1177						
276	NASIR U. KHAJA, M.D.				3655 LOMITA BLVD		TORRANCE	CA	90505			
				05/04/1987	50.00	07/09/1975 77						
11931	NASIR U. KHAJA, M.D.				3655 LOMITA BLVD.		TORRANCE	CA	90505			
	KHAJA	NASIR	U	02/29/1988	100.00	07/09/1975 485						
11403	NASIR U. KHAJA, M.D.				3655 LOMITA BLVD		TORRANCE	CA	90505			
	KHAJA	N.		02/19/1988	100.00	07/09/1975 1028						
10052	NELSON MOTOR PARTS				904 7TH		HARLAN	IA	51537			
	NELSON	WAYNE		01/12/1988	15.00	05/06/1987 130						
5414	NELSON MOTOR PARTS				904 7TH		HARLAN	IA	51537			
	NELSON	WAYNE		10/01/1987	19.88	05/06/1987 1187						
8088	NELSON MOTOR PARTS				904 7TH		HARLAN	IA	51537	1/29/88	$ 10.00	11/24/87-1/29/88 66
	NELSON	WAYNE		11/24/1987	10.00	05/06/1987 1378						
8792	NICOLSON - CARR, INC.						CARRINGTON	ND				
	KELLY	E.	W	12/10/1987	29.00	05/06/1959 1343						
2223	NORMAN F. SPRAGUE, JR., M.D.				3600 WILSHIRE BLVD., SUITE 2110		LOS ANGELES	CA	90010			
	SPRAGUE	NORMAN		07/09/1987	1,000.00	08/10/1979 1526						
10861	NORTH COTE FARM				ROUTE 1, BOX 511		FOREST	VA	24551			
				02/03/1988	1,000.00	08/26/1982 989						
929	NUTMEG CLEANERS				196 MAIN STREET		CHESHIRE	CT	06410			
				06/02/1987	35.00	10/30/1964 367						
11369	ORAL F. ANDREWS, C.L.U.						BOISE	ID	83707			
	ANDREWS	ORAL	F	02/18/1988	25.00	12/30/1982 823						
0	OWEN & ASSOCIATES				11827 WEST 112TH STREET, SUITE 102	IN-KIND	OVERLAND PARK	KS	66210			
					1,000.00	02/14/1984 1597						
8579	P AND D REALTY CO.				28 ROXBURY MALL		SUCCASUNNA	NJ	07876			
	RAMANO			12/07/1987	2,000.00	05/10/1946 261						

Listing of Possible Corporate Contributors by corporate name--Dole Run Date: 06/07/1990 Page: 5

Batch Number	Business Name	Last Name	First Name	MI	Deposit Date	Contribution Amount	Address 1	Incorp Date	Address 2	IID	City	State	Zip				
10814	PALMER DEVELOPMENT CO.				02/02/1988	1,000.00	2735 IRIS AVE., SUITE A	06/16/1987		992	BOULDER	CO	80302				
8886	PALMERI HARVEY YOUNG & CO.				12/14/1987	1,000.00	111 BROADWAY, SUITE 1308	12/26/1980		745	NEW YORK	NY	10006				
844	PAR REALTY				05/29/1987	25.00	652 FRANKLIN AVENUE	06/25/1983		81	GARDEN CITY	NY	11530				
1576	PARELL AND FRIES	SCHIMPF	MARIEL		06/22/1987	29.00	500 BROADWAY	10/14/1946		397	SACRAMENTO	CA	95818	6/28/88	$ 29.00*	6/22/87-6/28/88	372
11157	PARSONS, HART & CO., AGENT	GEBLER	KAREN		02/11/1988	34.00	SEATTLE TOWER	05/23/1925		813	SEATTLE	WA	98101				
999864	PECK SLIP ASSOCIATES				03/11/1988	1,000.00		08/19/1981		647	NEW YORK	NY	10019				
4982	PETER R. FREIDMAN LTD.	FREIDMAN	PETER	R	09/21/1987	1,000.00	767 5TH AVENUE, G.M. BUILDING	03/25/1975		1242	NEW YORK	NY	10153	9/26/88	1,000.00	9/21/87-9/26/88	371
7252	PINEY KNOLL FARMS	BODDICKER	PAM		11/05/1987	15.00	RR 2, BOX 124	06/01/1970		699	WALKER	IA	52352				
	PIPELINE ENGINEERING	RAMOS	MARY	A	07/10/1987	50.00	24822 2ND STREET	01/14/1974		1326	HAYWARD	CA	94541				
422	PRESTON R. HERBEL, M.D.	HERBELL	P		05/11/1987	50.00	630 W. 13TH AVENUE, STE.A	08/06/1971		348	UPLAND	CA	91786				
5642	R & A DISCOUNT STORES	CARROTT	ALBERT		10/02/1987	100.00	104 FIFTH AVENUE	11/16/1967		1205	BROOKLYN	NY	11217				
7971	R. O. BORDNER CONSTRUCTION COMPANY	BORDNER	R	O	11/20/1987	32.00	3016 N.E. BLAKELY	11/19/1985		168	SEATTLE	WA	98105				
6815	R.L. SWEET LUMBER CO.				10/28/1987	75.00		11/14/1951		56	KANSAS CITY	KS	66103				
8223	RADIOIMMUNOASSAY LABORATORIES FOR ENDOCRINOLOGY & THERA. DRUG	EAO	MICHAEL		11/27/1987	29.00	727 SILVER SPUR ROAD, SUITE 207	09/26/1986		1361	PALOS VERDES PENINSU	CA	90274				
7786	RALEY'S	RALEY	THOMAS	P	11/17/1987	32.00	P.O. BOX 15618	01/02/1947		1394	SACRAMENTO	CA	95852				
7949	RAVI MEHRA, M.D. - CONCORD - CRESTWOOD MEDICAL GROUP	MEHR	RAVI		11/20/1987	250.00	4598 SOUTH LINDBERGH BLVD.	03/31/1976		1413	ST. LOUIS	MO	63126				
8886	RBA GROUP	GAUG	WILLIAM		12/14/1987	2,000.00		10/07/1968		743	MORRISTOWN	NJ					

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Batch Number	Business Name / Last Name	First Name	M I	Deposit Date	Address 1 / Contribution Amount	Incorp Date	Address 2 / IRD	City	State	Zip			
	REDDAWAY TRUCK LINE				P.O. BOX 1035								
	SAULSBURY	J		12/31/1987	35.00	01/24/1925	338	CLACKAMAS	OR	97015			
6925	RELIANCE TOOL & MFG. CO.			10/30/1987	617 N. STATE ST. 50.00	10/14/1968	922	ELGIN	IL	60123			
11494	RICHARD C. BISHOP, M.D.				301 W. BASTANCHURY RD.								
	PYLES	LAURA	E	02/22/1988	100.00	12/22/1976	845	FULLERTON	CA	92635			
1901	RICHARD P. KEIM, D.D.S.				354 NEW BROTHERHOOD BLDG.								
	KEIM	RICHARD	P	06/30/1987	500.00	04/17/1972	1515	KANSAS CITY	KS	66101			
11334	RICHARD T. RADA, M.D.				10802 COLLEGE PL.								
	RADA	RICHARD	T	02/18/1988	50.00	03/25/1982	822	CERRITOS	CA	90701			
12825	RICKETTS TRUCKING COMPANY				1001 W. MAGNOLIA								
	NORTON	LORETTA		03/31/1988	200.00	12/01/1983	575	PHOENIX	AZ	85007	7/29/88	$200.00*	3/31/88-7/29/88 120
999929	ROBERT H. HARMON, D.D.S., P.A.				613 MARKET, SUITE 101								
	HARMON	ROBERT	H	03/25/1988	100.00	08/06/1980	1466	OSAGE CITY	KS	66523			
11169	ROBERT L. HANARD, III, ATTORNEY AT LAW				321 CARONDELET ST., SUITE 400								
				02/12/1988	(1,000.00)	02/18/1982	1011	NEW ORLEANS	LA	70130			
5681	ROBINS ASSOCIATES, P.A.				12674 BUCKLAND STREET								
				10/09/1987	(29.00)	01/28/1982	1273	WEST PALM BEACH	FL	33414			
7728	RONALD BOOK, P.A. - OPERATING ACCOUNT				20801 BISCAYNE BOULEVARD, SUITE 401								
	BOOK	RONALD		11/17/1987	(1,000.00)	01/29/1987	218	NORTH MIAMI BEACH	FL	33180			
11083	ROSE BRIGLEVICH, M.D., P.C.				4002 RIDGE RD.								
	BRIGLEVICH	R.		02/09/1988	100.00	07/25/1977	800	SMYRNA	GA	30080	7/28/88	$100.00*	2/9/88-7/28/88 170
11883	ROSEN, INGBERMAN AND ROSEN				900 SYLVAN AVENUE								
	ROSEN	JOSEPH		02/29/1988	1,000.00	10/16/1984	474	ENGLEWOOD CLIFFS	NJ	07632			
12087	RUBLE CONSTRUCTION CO.				3063 BEECH RUB								
	RUBLE	CECIL	D	03/01/1988	(29.00)	04/14/1977	1111	MEMPHIS	TN	38128			
5263	RUBLE CONSTRUCTION CO.				3063 BEECH RUB								
	RUBLE	CECIL	D	09/29/1987	(58.00)	04/14/1977	1166	MEMPHIS	TN	38126			
8157	S & J LAND & CATTLE CO.												
	PAPE	WILLIS	J	11/23/1987	(25.00)	12/08/1980	163	ROBINSON	KS	66532			
5510	S. ALSHABEHOUN, M.D. & ASSOCIATES, S.C.				218 W. 22ND STREET SUITE 133								
	ALSHABEHOUN	GERALDINE		10/02/1987	50.00	01/29/1970	51	OAK BROOK	IL	60521			
7383	SACKS REALTY CO.				10 HURON AVE								
	SACKS	ROBERT		11/05/1987	1,000.00	05/13/1976	70	JERSEY CITY	NJ	07304			

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Batch Number	Business Name / Last Name	First Name	M I	Deposit Date	Address 1 / Contribution Amount	Incorp Date	Address 2 / IID	City	State	Zip			
3264	SCHWINDLER BROKERAGE COMPANY-WICHITA WRIGHT	GARY	L	08/06/1987	939 NORTH MAIN 250.00	12/18/1978	1587	WICHITA	KS	67203			
7044	SERVICES UNLIMITED OSTRANDER	DON	G	11/01/1987	3045 BUTTON ROAD 50.00	03/14/1983	672	TOPEKA	KS	66618			
7410	SHERMAN'S MOBILE AIR CONDITIONING SHERMAN	DONALD	P	11/09/1987	3820 THIRD STREET 25.00	03/22/1985	1308	RIVERSIDE	CA	92501	2/15/88	25.00	11/9/87-2/15/88 98
3636	SILVI CONCRETE PRODUCTS, CERTIFIED READYMIX CONCRETE, ETC. SILVI	JOHN	J	08/14/1987	1901 BRISTOL PIKE 1,000.00	12/28/1962	1560	MORRISVILLE	PA				
1044	SMITH AND THOMAS			06/08/1987	11 GOLDEN SHORE DR., SUITE 420 108.00	07/02/1976	376	LONG BEACH	CA	90802			
13094	SMITH AND THOMAS			04/29/1988	11 GOLDEN SHORE DR., SUITE 420 30.00	07/02/1976	1443	LONG BEACH	CA	90802			
7987	SPRINGFIELD FARM STONE	CHERRILL	K	11/19/1987	ROUTE 1, BOX 220-D 32.00	06/15/1977	1408	LINVILLE	VA	22834			
9160	STEPHEN E. GENENDER, M.D. GENENDER	S	E	12/18/1987	8635 W. 3RD ST., STE 1090, W. TOWER 1,000.00	10/17/1980	142	LOS ANGELES	CA	90048			
10709	SUBURBAN ELECTRIC GLASSEY	JOY	,	01/28/1988	P.O. DRAWER 586 50.00	03/02/1981	967	CRESTLINE	CA	92325			
7044	SUNRISE OILFIELD SUPPLY COMPANY			11/03/1987	104 S. BROADWAY, SUITE 1400 50.00	12/28/1979	666	WICHITA	KS	67202			
6354	SUSAN E. LOGGANS & ASSOCIATES			10/20/1987	615 N. WABASH AVE. 100.00	12/21/1984	861	CHICAGO	IL	60611			
10005	SYSTEMS 3 MONHOLLON	JOANN		01/11/1988	3715 SW 29TH STREET 15.00	03/20/1978	354	TOPEKA	KS	66614			
399857	SYSTEMS 3 MONHOLLON	JOANN		03/14/1988	3715 SW 29TH STREET 15.00	03/20/1978	1588	TOPEKA	KS	66614			
6494	TENNESSEE VALLEY SALES COMPANY JONES III	ROBERT	C	10/22/1987	SUITE 605, TALLAH BUILDING 100.00	12/27/1982	1420	CHATTANOOGA	TN	37402			
12584	THREE MAPLE FARMS SOLVERSON	ALAN	D	03/18/1988	ROUTE 3 30.00	05/28/1976	27	VIROQUA	WI	54665			
6283	TOM HELMS ASSOCIATES HELMS	TOM		10/16/1987	99 ELKINS LAKE 50.00	01/10/1983	1217	HUNTSVILLE	TX	77340			

Listing of Possible Corporate Contributors by corporate name--Dole Run Date: 06/07/1990 Page: 12

Batch Number	Business Name				Address 1		Address 2	City	State	Zip				
	Last Name	First Name	M I	Deposit Date	Contribution Amount	Incorp Date	IID							
11668	TOMAHAWK CONSTRUCTION CO.				P.O. BOX 3510			KANSAS CITY	KS	66103				
	JANOVEC	DELMAR	A	02/24/1988	250.00	01/21/1981	450				6/28/88	$250.00*	2/24/88-6/28/88	125
10684	TOMAHAWK CONSTRUCTION CO.				P.O. BOX 3510			KANSAS CITY	KS	66103				
				01/28/1988	32.00	01/21/1981	451							
6116	TOMAHAWK CONSTRUCTION CO.				P.O. BOX 3510			KANSAS CITY	KS	66105				
	JACQUES	MARTLIN		10/15/1987	150.00	01/21/1981	1280							
10669	TONY DEPAUL & SON				8TH & OLNEY AVE			PHILADELPHIA	PA	19120				
	DEPAUL	PETER		01/28/1988	1,000.00	04/16/1980	970							
11883	TRI FARMS				P.O. BOX 7			FIREBAUGH	CA	93622				
	SUDER	OMF		02/29/1988	1,000.00	03/21/1975	20							
13204	UNITED PETRO LTD.				5110 N CENTRAL AVE., SUITE 220			PHOENIX	AZ	85012				
	HUNSING	WILLIAM	A	05/12/1988	25.00	10/01/1976	613							
3680	UNITED SUPPLY CO.				2554 LINCOLN BLVD., STE. NO. 316			MARINA DEL REY	CA	90291				
	CRITTENDEN	MARK	R	07/23/1987	750.00	09/27/1962	1531							
8522	VAUGHN ORGANIZATION				42 WEST LAFAIETTE STREET			TRENTON	NJ	08608				
	VAUGHN	B	E	12/04/1987	1,000.00	12/27/1984	162							
8826	VEITAS & VEITAS ENGINEERS				29 FOXHILL LANE			MILTON	MA	02186				
	VEITAS	RABURADOSLAS		12/14/1987	1,000.00	12/24/1986	744							
11883	VICTOR J. DIAMOND, D.D.S., INC.				9201 SUNSET BLVD., SUITE 915			LOS ANGELES	CA	90069	6/28/88	$10.00*	2/29/88-6/28/88	120
	GOLDFINGER	MARSHA		02/29/1988	10.00	06/01/1977	673							
2438	VP ENTERPRISES				HIGHWAY 36			SMITH CENTER	KS	66967				
				07/16/1987	104.00	01/11/1979	1526							
9160	WALD ORGANIZATION, THE				P.O. BOX 69170			LOS ANGELES	CA	90069				
	LIVINGSTON	DONALD		12/18/1987	500.00	09/30/1980	143							
11705	WALSH & HINCKLEY COMPANY				200 RENAISSANCE CENTER, SUITE 2930			DETROIT	MI	48243				
	STERN	SUSANNE		02/24/1988	100.00	07/29/1968	109							
6908	WALTER R. BLAKE, P.A., ATTORNEY AT LAW				1881 UNIVERSITY DR., SUITE 202			CORAL SPRINGS	FL	33065				
	BLAKE	WALTER	R	09/21/1987	8.50	03/12/1979	1241							
7617	WARDROBE CLEANERS				2413 MAIN			PARSONS	KS	67357				
	HAMSHER	NADINE	L	11/13/1987	25.00	03/26/1971	230							
12450	WARMINGTON HOMES				3090 PULLMAN ST.			COSTA MESA	CA	92626				
	BREISLE	WILLIAM	S	03/14/1988	250.00	12/06/1976	521							
9432	WEATHERLY INSULATION COMPANY				P.O. BOX 956			SUMTER	SC	29150				
	WEATHERLY	WILLIAM	A	12/30/1987	12.00	12/31/1984	750							

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Batch Number	Business Name	Address 1	Address 2	City	State	Zip
Last Name	First Name	M I	Deposit Date	Contribution Amount	Incorp Date	IID			
5978	WELLS PROPERTIES			P.O. BOX 2546			SOUTHSAN FRANCISCO	CA	94081
WELLS	DONALD	A	10/11/1987	50.00	05/28/1981	1276			
1515	WEST LAND SURVEYORS			7918 HANOVER AVE.			DALLAS	TX	
			06/19/1987	50.00	05/18/1987	392			
7788	WHITE FUEL COMPANY			12 HYLESTEAD STREET			PROVIDENCE	RI	02905
			11/17/1987	10.00	01/16/1939	203			
7760	WICHITA ON-GYN ASSOCIATES, P.A.			550 NORTH LORRAINE			WICHITA	KS	67214
SAWYER	SHERRI		11/17/1987	50.00	01/04/1980	211			
5631	WILLIAM S. KITCH, M.D.			5354 REYNOLD STREET, SUITE 401			SAVANNAH	GA	31406
WOODS	PAULINE		10/02/1987	48.00	08/15/1985	1269			
7101	WILLIAM S. KITCH, M.D.			5354 REYNOLD STREET, SUITE 401			SAVANNAH	GA	31405
WOODS	PAULINE		11/03/1987	500.00	08/15/1985	1291			
6694	WILLIAM W. BEASLEY, D.D.S.			5400 BALBOA BOULEVARD, SUITE 321			ENCINO	CA	91316
UNKNOWN			10/27/1987	29.00	04/27/1979	1427			
8370	WILSHIRE CENTER CAMERAS			3101 WEST 6TH STREET			LOS ANGELES	CA	90020
BIMBLEY	D	P	11/30/1987	5.00	08/25/1972	244			

Total For Report 68,843.38

Total Records: 213

DOLE FOR PRESIDENT COMMITTEE

93040955323

Use of Corporate Aircraft

Section 114.9(e) of Title 11 of the Code of Federal Regulations states, in part, that a candidate, candidate's agent or person traveling on behalf of a candidate who uses an airplane which is owned or leased by a corporation, other than a corporation licensed to offer commercial services, for travel in connection with a Federal election must, in advance, reimburse the corporation - in the case of travel to a city served by regularly scheduled commericial service, the first class air fare; in the case of travel to a city not served by regularly scheduled commercial service, the usual charter rate.

The Committee used private aircraft owned by corporations for campaign related travel. The Audit staff reviewed all payments for these services and identified 31 payments, totaling $58,564.85, made to 18 corporations which were not made in advance as required by 11 C.F.R. §114.9(e). These corporations do not appear to be licensed to offer commercial services for travel. The payments were made between 1 and 409 days after the date of travel. It should be noted that 13 of the payments, totaling $19,787.00, were made within 5 days after the dates of travel.

In one instance, the documentation indicated that an individual, associated with a corporation, chartered aircraft from the corporation and in this case paid for the charters from his personal funds. Another document referred to the payment as being made from the individual's "personal business account."

The individual paid $9,987.85 for the aircraft charges and was reimbursed by the Committee in the amount of $7,512.85. The documentation mentions the $2,475.00 difference as airfare possibly not authorized by the Committee but it is unclear as to whether this portion was reimbursed as well.

One of the other eighteen payments, in the amount of $9,905.00, is related to the second of three apparent prohibited in-kind contributions discussed at Exhibit A. This was the in-kind contribution resulting from the Committee withholding $1,000 from the total cost for the airplane rental due to the $1,000 transportation expense exemption allowed by 11 C.F.R. 100.7(b)(8). The auditors concluded that this provision applies to individuals, not to corporations.

At the exit conference, the Committee Treasurer stated that payments made after the travel date occurred when travel arrangements were changed at the last minute and the check had

already been made out. He felt it was more important to wait until a new check could be prepared than to send a check with an incorrect amount.

The Committee was provided with a schedule and copies of supporting documentation related to these payments.

In the Interim Audit Report, the Audit staff recommended that the Committee provide evidence which demonstrates why the Committee is not in violation of 11 C.F.R. § 114.9(e) with respect to payments to the corporations noted above.

The Audit staff further recommended that the Committee provide additional information relating to the chartered corporate aircraft apparently paid from an individual's personal funds including the circumstances surrounding this payment, an explanation of the $2,475.00 difference between the aircraft charges and the amount reimbursed by the Committee, and whether a discount was received by the Committee as a result of the individual's association with the corporation.

In the Committee's response to the Interim Audit Report, the Committee Treasurer stated that it was their policy to make advance payments to corporations for the use of their aircraft. He explained that "...if it came down to deciding between making a guess as to how much should be paid or waiting until after completion of a trip to pay the correct amount, we would wait. Often it was unknown how many people would be on which legs of any given trip. Corporations were confused enough about the checks we gave them that giving them one then asking for its return so we could give them a new and correct one was, for some, too much. I believed that briefly late correct payments were more in keeping with the spirit of the law than forcing a 'best guess' check on a confused corporation."

Of the 31 payments, totaling $58,564.85, the Committee's response included comments and documentation related to 18, totaling $38,777.85. Based on the Audit staff's review of this information, five of these payments, totaling $6,775.00, will be deleted. Three of these items were replacement checks for checks sent in advance of the travel. One item had an incorrect date written on the Committee's "Request for Expenditure" form and one item was an additional amount related to an earlier check, paid in advance, which had a mathematical error.

It should be noted that the 13 payments not addressed by the Committee in their response were all made within 5 days of the dates of travel (13 payments totaling $19,787.00). It appears that the Committee omitted these items because when this issue was presented to them at the exit conference, the Audit staff informed them that they would possibly be excluded from the finding as

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immaterial, but that the Commission might decide to include them. Based on the Office of General Counsel's recommendation, and subsequent approval by the Commission, these items were included in the Interim Audit Report finding.

In addition, the Committee's response included information about three payments which were originally included in documentation provided to the Committee at the exit conference but subsequently excluded from the Interim Audit Report based upon our review of additional documentation.

The Committee's response mentions the two $1,571 payments to Contran and explains that the second payment was a duplicate payment. However, the response does not indicate if the second check was ever returned uncashed or if a refund check was ever received in the amount of $1,571. The Audit staff reviewed the appropriate FEC reports but no refund was disclosed.

The Interim Audit Report included a recommendation that the Committee provide additional information for a $2,475.00 difference between the charges related to a chartered corporate aircraft and the amount reimbursed by the Committee, and whether a discount was received. The Committee's response stated that the $2,475.00 was not paid by the campaign because it had not been authorized, and that the amount was apparently paid initially by an individual and would not appear to involve a corporate contribution. He adds that "[w]e were all sort of confused by this one..." This amount was not included in the total questioned in the interim audit report. Based on the Committee's explanation, the $2,475.00 will now be included in the total items being questioned.

In summary, the Audit staff has identified 26 (31-5) payments, totaling $54,264.85 ($58,564.85 + $2,475.00 - $6,775.00), made to 15 corporations which were not made in advance as required by 11 C.F.R. §114.9(e) (see Attachment 1). These corporations do not appear to be licensed to offer commercial services for travel. The number of days after the date of travel these payments were made ranged from 1 day to 409 days. It should be noted that 13 of the payments, totaling $19,787.00, were made within 5 days after the dates of travel.

Recommendation #2

The Audit staff recommends that pursuant to the Commission approved Materiality Thresholds, this matter be referred to the Commission's Office of General Counsel.

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Corporate Air Travel - Not Paid In Advance

	Corporation	Check Amount	Check Date	Travel Date(s)	Committee Check Request Date
1.	American Financial Corp.	$1,038.00*	6/25/87	?	6/21/87
		495.00*	8/31/87	8/29/87	8/31/87
2.	Becon Construction Company, Inc.	9,987.85	4/07/88	1/18/88, 2/25-2/27/88 3/05/88, 3/08/88	4/07/88
		1,500.00	4/01/88	12/03/87, 12/12/87	2/25/88
3.	B & G Investments	4,398.00*	2/08/88	2/06/88-2/07/88	2/06/88
4.	Browning-Ferris Industries	630.00	7/08/87	5/01/87, 6/27/87	7/07/87
		1,254.00	3/15/88	3/07/88	
		1,280.00	3/24/88	7/28/87, 10/11/87 11/18/87	3/15/88
		2,709.00*	5/05/87	5/01/87-5/03/87	5/05/87
		2,414.00*	11/20/87	11/17/87-11/18/87	11/16/87
5.	Businessmen's Assurance Company	676.00	4/24/87	4/14/87	4/14/87
6.	The Coastal Corporation	166.00*	8/20/87	8/17/87	8/18/87

*Although not paid in advance, payment was made within 5 days after the dates of travel (13 payments totaling $19,787.00).

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Corporate Air Travel - Not Paid In Advance

	Corporation	Check Amount	Check Date	Travel Date(s)	Committee Check Request Date
7.	Contran	1,662.00	2/03/88	1/12/88	2/02/88
		1,571.00	3/24/88	3/14/88	3/24/88
		1,571.00	4/01/88	3/14/88	3/14/88
8.	The Home Insurance Co.	1,430.00*	4/24/87	4/20/87	4/20/87
9.	Long Lines Limited	3,880.00	12/31/87	12/23-12/24/87	12/31/87
10.	Owen and Associates	9,905.00	5/06/88	Various Dates 3/24-11/09/87	4/28/88
11.	Pfiser Corporation	178.00*	9/11/87	9/10/87	-
12.	Refco	441.00*	2/03/88	2/01-2/02/88	2/02/88
13.	Stephens, Inc.	330.00	6/19/87	5/13/87	6/19/87
		1,022.00*	12/8/87	12/5-12/6/87	12/8/87
		1,250.00*	3/04/88	3/01/88	3/04/88
14.	Torchmark Corporation	3,265.00*	3/02/88	2/27/88	3/02/88
		981.00*	4/07/88	4/02/88	4/06/88
15.	Winston Network, Inc.	231.00	1/29/88	1/21/88	1/29/88
	TOTAL	$ 54,264.85			

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Apparent Excessive Contributions

Section 441a(a)(1)(A) of Title 2 of the United States Code states that no person shall make contributions to any candidate with respect to any election for Federal office which, in the aggregate, exceed $1,000.00.

Section 441a(a)(2)(A) of Title 2 of the United States Code states that no multicandidate political committee shall make contributions to any candidate and his authorized political committees with respect to any election for Federal office which, in the aggregate, exceed $5,000.00.

Section 110.1(k) of Title 11 of the Code of Federal Regulations states, in part, that any contribution made by more than one person, except for a contribution made by a partnership, shall include the signature of each contributor on the check, money order, or other negotiable instrument or in a separate writing. A contribution made by more than one person that does not indicate the amount to be attributed to each contributor shall be attributed equally to each contributor. If a contribution to a candidate on its face or when aggregated with other contributions from the same contributor exceeds the limitations on contributions, the Treasurer may ask the contributor whether the contribution was intended to be a joint contribution by more than one person. A contribution shall be considered to be reattributed to another contributor if the treasurer of the recipient political committee asks the contributor whether the contribution is intended to be a joint contribution by more than one person, and informs the contributor that he or she may request the return of the excessive portion of the contribution if it is not intended to be a joint contribution; and within sixty days from the date of the treasurer's receipt of the contribution, the contributors provide the treasurer with a written reattribution of the contribution, which is signed by each contributor, and which indicates the amount to be attributed to each contributor if equal attribution is not intended.

Section 103.3(b)(3) of Title 11 of the Code of Federal Regulations states, in part, that contributions which exceed the contribution limitation may be deposited into a campaign depository. If any such contributions are deposited, the treasurer may request redesignation or reattribution of the contribution by the contributor in accordance with 11 C.F.R. § 110.1(b), 110.1(k) or 110.2(b), as appropriate. If a redesignation or reattribution is not obtained, the treasurer shall, within 60 days of the treasurer's receipt of the contribution, refund the contribution to the contributor.

Section 103.3(b)(4) of Title 11 of the Code of Federal Regulations states, in part, that any contribution which appears to be illegal and which is deposited into a campaign depository shall not be used for any disbursements by the political committee until the contribution has been determined to be legal. The political committee must either establish a separate account in a campaign depository for such contributions or maintain sufficient funds to make such refunds.

Section 441a(f) of Title 2 of the United States Code states that no candidate or political committee shall knowingly accept any contribution in violation of any limitation on contributions.

1. Apparent Excessive Contributions from Individuals

During the review of contributions from individuals, the Audit staff determined that the Committee had accepted 549 contributions, totaling $246,187.31, from 423 individuals which were in excess of the 2 U.S.C. §441a(a)(1)(A) limit and not timely refunded*/, reattributed or redesignated.

Of these contributions, 397, totaling $206,670.21, from 334 individuals, were refunded but not in a timely manner. The average number of days from the Committee's date of deposit to the date of refund was 108. An additional 139 contributions, totaling $32,856.60, from 76 contributors were redesignated by the contributor and transferred to the Committee's Compliance Fund, but not in a timely manner. The average number of days from the Committee's date of deposit to the date of transfer was 115. Nine contributions, totaling $5,155.50 in excess of the limitations, from 9 contributors, were never refunded by the Committee; and 4 contributions, totaling $1,505.00, from 4 contributors were refunded, but as of 2/28/89 the refund checks were still outstanding.

The Audit staff found neither a separate account for the deposit of contributions which were possibly excessive or prohibited, nor a method to monitor an amount required to be kept in the Committee's regular accounts while the acceptability determination was being made. The reported ending cash balances were as follows:

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*/ Section 103.3(b) of the Code of Federal Regulations was amended effective April 8, 1987. However, it is the opinion of the Audit staff that these contribution refunds were not made within a reasonable time as required by the previous regulation.

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Report Period	Ending Balance */
Inception - 3/31/87	$ 208,742.71
4/1/87 - 6/30/87	1,685,502.24
7/1/87 - 9/30/87	2,214,821.68
10/1/87-12/31/87	2,208,682.83
1/1/88 - 1/31/88	4,153,698.85
2/1/88 - 2/29/88	836,445.98
3/1/88 - 3/31/88	374,415.37
4/1/88 - 4/30/88	519,912.58

Based on these ending cash balances, it appears that the Committee maintained sufficient funds to make any necessary refunds.

The Audit staff provided the Committee a listing of the items at the exit conference.

In the Interim Audit Report, the Audit staff recommended that the Committee take the following action:

- Provide evidence that the contributions in question are not excessive; or
- Refund the remaining $5,155.50 in contributions from individuals to the contributors and provide evidence of such refunds (i.e., copies of the front and back of the negotiated refund checks); or
- If funds are not available to make such refunds, disclose the excessive contributions as debts owed by the committee on Schedules D-P.
- In addition, provide evidence that the 4 contributions, totaling $1,505.00, which were outstanding as of 2/28/89 are no longer outstanding (i.e., copies of the front and back of the negotiated checks).

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*/ Also see Exhibit A, Prohibited Contributions.

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The Committee Treasurer states in the Committee's response to the report that the Committee agrees with the Audit staff on five of the nine excessive contributions from individuals noted as never being refunded. He notes the total for these five items as $4,101.00, although the correct total is $5,100.00 (see Attachment 1). The Treasurer explains that the Committee did not make these refunds because they did not have addresses for these five individuals.

The Committee provided additional information regarding the remaining four items, totaling $55.50. The Audit staff has reviewed this information and, based on this review, has deleted these four items.

Regarding the 4 excessive contributions, totaling $1,505.00, which were refunded but remained outstanding as of 2/28/89, the Committee did not provide any specific documentation for these items, but in response to the Stale Dated Committee Checks finding, they state that the Committee has voided a number of the outstanding checks and would like to review these with the Audit staff. The Audit staff met with the Committee and determined that these four items are still outstanding.

In conclusion, the Audit staff determined that the Committee had accepted 545 contributions, totaling $246,131.81, from 419 individuals, which were in excess of the 2 U.S.C. §441a(a)(1)(A) limit and not timely refunded, reattributed or redesignated.

Recommendation #3

The Audit staff recommends that pursuant to the Commission approved Materiality Thresholds, this matter be referred to the Commission's Office of General Counsel.

2. Excessive Contributions from Political Committees

During the review of contributions from political committees, the Audit staff noted contributions from 13 political committees which exceed the contribution limitation by $19,670 (18 excessive contributions). Four of the excessive contributions, totaling $8,000.00, were refunded but not in a timely manner. The average number of days from the Committee's date of deposit to the date of refund was 116. One excessive contribution, in the amount of $2,000.00, was redesignated by the contributor and transferred to the Committee's Compliance Fund, but not in a timely manner (106 days).

The remaining 13 excessive contributions, totaling $9,670.00, were never refunded by the Committee.

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As discussed above, a separate account was not established by the Committee for possible illegal contributions, nor were account balances monitored to ensure that sufficient funds were available to make refunds. However, it appears that sufficient funds were on hand to make the necessary refunds.

The Committee was provided with a schedule of the excessive contributions.

In the Interim Audit Report, the Audit staff recommended that the Committee take the following action:

- Provide evidence that the contributions in question are not excessive; or

- Refund the remaining $9,670.00 in contributions from political committees to the contributors and provide evidence of such refunds (i.e., copies of the front and back of the negotiated refund checks);

- If funds are not available to make such refunds, disclose the excessive contributions as debts owed by the Committee on Schedules D-P.

In the Committee's response to the report, the Committee Treasurer states that of the 18 excessive contributions, totaling $19,670 (excessive portions), from political committees, the Committee has no record of receiving 10 of the listed contributions, totaling $14,120.00.*/ He further states that "[t]he fact that a PAC reported giving us a contribution does not mean we got the check. It is possible we received earmarked contributions from these PAC's, but we would have reported those as being from the individuals giving the contribution, not the associated PAC."

The Committee agrees with two of the excessive contributions, Johnston for Congress ($1,000) and Tele-Comm., Inc. PAC ($1,000), and states it will refund $1,000 to each committee. No evidence of such refunds was included in the response or noted in the Committee's disclosure reports.

The Audit staff reviewed the information provided in the Committee's response regarding the excessive contributions from political committees along with information contained in the audit workpapers. Based on this review, four contributions

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*/ The Audit staff notes that check copies were obtained from the Committee's contribution batch records for 6 of these 10 contributions, totaling $12,050.00.

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totaling $795.00 have been determined to be earmarked contributions and have been deleted from the finding. In addition, two contributions totaling $2,000.00 were found to have been reported by the Committee under the name of an individual. However, the documentation for these contributions does not establish that they were earmarked for the Committee by the contributor. Therefore, these contributions remain in the excessive contribution total.

Also, in light of the Committee's statements that some contributions for which check copies and deposit records were found in Committee records had not been received by the Committee, and that some apparent political committee contributions were found reported in an individual's name, contributions taken from contributing committee reports have not been deleted from the finding. Two such contributions remain totaling $1,500.00. These items may have been earmarked and/or reported in the name of an individual.

It is also noted that other excessive contributions could be earmarked but Committee records do not contain information establishing the earmarking, and a review of reported earmarked contributions produced no information concerning any contributions remaining in the excessive contribution total.

In summary, the Audit staff notes contributions from 11 political committees which exceed the contribution limitation by $18,875 ($19,670 - $795). This total is comprised of 14 (18 - 4) excessive contributions. Four of the excessive contributions, totaling $8,000.00, were refunded but not in a timely manner. The average number of days from the Committee's date of deposit to the date of refund was 116. One excessive contribution, in the amount of $2,000.00, was redesignated by the contributor and transferred to the Committee's Compliance Fund, but not in a timely manner (106 days). See Attachment 2. Attachment 3 contains photocopies of the contributor checks for the excessive contributions which were documented in the Committee's records.

The remaining 9 excessive contributions, totaling $8,875, were never refunded by the Committee.

Recommendation #4a

The Audit staff recommends that pursuant to the Commission approved Materiality Thresholds, this matter be referred to the Commission's Office of General Counsel.

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3. Compliance Fund

As discussed in Section C.1. of this Exhibit, the Audit staff noted contributions from individuals to the Committee which were in excess of the 2 U.S.C. §441a(a)(1)(A) limit and not timely refunded, reattributed or redesignated. Included in these items were contributions subsequently redesignated by the contributors and transferred to the Dole for President Compliance Fund (Compliance Fund) between September 30, 1987 and June 28, 1988.

The total amount of contributions redesignated and transferred to the Compliance Fund was $102,662.55. The Compliance Fund also received $16,292.00 in direct contributions between November 19, 1987 and July 29, 1988. The only operating expenditures made by the Compliance Fund totaled $166.80 for two bank charges. The Compliance Fund reported contribution refunds totaling $19,542.00 through September 30, 1990. It should be noted that these refunds were made within sixty days from the date of Vice President Bush's nomination (8/17/88), which is in compliance with 11 C.F.R. §110.1(b)(3)(i).

On November 14, 1988, the Dole for President Committee - Penalty & Interest Fund (PIF) registered with the Federal Election Commission. The treasurer of the PIF, Jim Hagen, is also the treasurer of the Committee and the Compliance Fund.

According to Mr. Hagen, letters were sent to all contributors whose contributions had been redesignated to the Compliance Fund or received directly by the Compliance Fund with a choice of either redesignating their contributions to the PIF or receiving a contribution refund. The letter explained that the PIF was established "to pay any fines or penalties the Federal Election Commission might levy against Senator Dole and Dole for President." See Attachment 4.

The letter further explained that a fund such as the PIF is permitted under 11 C.F.R. §9034.4(b)(4). This regulation states that civil or criminal penalties paid pursuant to the FECA are not qualified campaign expenses and cannot be defrayed from contributions or matching payments. The cite further states that any amounts received or expended to pay such penalties shall not be considered contributions or expenditures but all amounts received shall be subject to the prohibitions of the Act.

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Letters signed by the contributors which redesignated $50,814.00 of their contributions from the Compliance Fund to the PIF were reviewed by the Audit staff. These letters were dated from August 9, 1988 to August 22, 1988 and were date-stamped as received back by the Compliance Fund between August 26, 1988 and September 22, 1988. Therefore, these redesignations were made within sixty days from the date of Vice-President Bush's nomination. The Compliance Fund transferred $50,814.00 to the PIF on December 5, 1988. The only activity reported by the PIF through September 30, 1990 was $6,035.18 in interest earned.

The Audit staff noted that other than the $19,542.00 in contribution refunds and the $50,814.00 transfer of redesignated contributions from the Compliance Fund to the PIF, the Compliance Fund had taken no action with regard to the remaining $48,598.55 in contributions. The $48,598.55 in contributions consisted of both contributions transferred from the Committee and contributions received directly by the Compliance Fund.

On January 25, 1991, the Committee submitted photocopies of 105 contribution refund checks (front only) in the amount of $48,748.55 with check dates of January 16 and 17, 1991. These refunds were not made in a timely manner. The $150.00 difference between the contribution refunds and the remaining contributions in the Compliance Fund ($48,748.55 - $48,598.55) resulted from the transfer of a $325.00 contribution from the Compliance Fund to the PIF when the amount of the original contribution was actually $175.00. Mr. Hagen stated that $150.00 would be transferred back to the Compliance Fund from the PIF to correct this error.

It should be noted that these contribution refunds are subject to audit verification and pursuant to 11 C.F.R. §9038.6, any which remain outstanding are payable to the United States Treasury.

Recommendation #4b

The Audit staff recommends that pursuant to the Commission approved Materiality Thresholds, this matter be referred to the Commission's Office of General Counsel.

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EXHIBIT C
ATTACHMENT 1

Dole for President
Apparent Excessive Contributions -
Never Refunded by Committee

Contributor Name	Excessive Contribution: Deposit Date	Excessive Contribution: Amount	Aggregate Total	Amount in Excess
1. Richard W. Brown	03/25/88	$1,000.00	$2,000.00	$1,000.00
2. Stephen B. Flood	03/16/88	2,000.00	2,000.00	1,000.00
3. James J. Hagen	12/24/87	1,000.00	1,100.00	100.00
4. Don Hall	02/12/88	3,000.00	3,000.00	2,000.00
5. John W. Jordan, II	03/01/88	2,000.00	2,000.00	1,000.00
TOTAL				$5,100.00

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Excessive Contributions from Political Committees

	Committee Name	Q1/	Contribution Dates	Contribution Amounts	Excessive Portions	Refunds Dates	Refunds Amounts	No. of Days to Refund
1.	Arthur Young & Company PAC	Y	6/03/87	$1,000.00	$			
			8/07/87	1,000.00 2/				
			12/23/87	1,000.00				
			12/23/87	4,000.00	2,000.00			
			12/31/87	500.00	500.00 3/			
2.	Dallas Citizens PAC	N	1/11/87	1,000.00				
			1/11/88	1,000.00	1,000.00 3/			
3.	Fluor Corporation Public Affairs Committee (FLUOR PAC)	Y	6/30/87	5,000.00				
			11/04/87	2,000.00	2,000.00	2/18/88	$2,000.00 4/	106
4.	Good Government Federal Political Action Committee	N	11/09/87	1,000.00				
			11/13/87	1,000.00	1,000.00	4/15/88	1,000.00	154
5.	Hartford Insurance Group-PAC	Y	9/21/87	2,000.00				
			3/17/88	5,000.00	2,000.00	6/28/88	2,000.00	103
6.	Johnston for Congress	N	6/29/87	1,000.00				
			1/27/88	1,000.00	1,000.00			

1/ Qualified Multi-Candidate Committee (Y-Yes, N-No)

2/ Recorded and reported in the name of David Carney. Documentation does not establish that this contribution was earmarked.

3/ Taken from contributing committees' reports.

4/ Transferred to Committee's Compliance Fund.

Excessive Contributions from Political Committees

	Committee Name	Q1/	Contribution Dates	Contribution Amounts	Excessive Portions	Refunds Dates	Refunds Amounts	No. of Days to Refund
7.	The National Good Gov't Fund	Y	11/23/87	5,000.00				
			3/30/87	1,000.00	1,000.00			
8.	Non-Partisan Political Support Committee (G.E.)	Y	11/23/87	5,000.00 5/				
			12/24/87	1,000.00 5/	1,000.00			
			2/12/88	1,000.00 5/	1,000.00			
9.	U.S. Federation of Small Businesses PAC (Small BIZ PAC)	N	12/23/87	1,000.00				
			3/11/88	4,000.00	4,000.00	6/24/88	4,000.00	105
10.	Southwestern Bell Corp. Employee Federal PAC	Y	6/09/87	1,000.00 6/				
			6/30/87	1,000.00				
			6/30/87	375.00				
			8/19/87	1,000.00				
			11/03/87	1,000.00				
			12/03/87	1,000.00	375.00			
11.	Tele-Comm., Inc. PAC	N	11/24/87	2,000.00	1,000.00	3/04/88	1,000.00	101
			3/29/88	1,000.00	1,000.00			
	Total				$18,875.00			

5/ Contributor check is labeled as earmarked, however, no name is associated with the contribution.

6/ Recorded and reported in the name of Gary Andres. Documentation does not establish that this contribution was earmarked.

EXHIBIT C
Attachment 3
Page 1 of 29

C-24/14 (2)

DOLE FOR PRESIDENT COMMITTEE INC

: 6-3-87
ESSOR DS
EWER DS

BATCH NUMBER 000945
DEP. CATEGORY IH PAC
TOTAL MAIL 2

TRIBUTORS

2

DOLLAR AMOUNT

2,000.00

-CONTRIBUTORS 6

MF

23

PLEASE LIST EACH CHECK SEPARATELY

Dollars	Cents
000945	00
2 items	
IH	
PAC	

JUN 1987
Deposited by
SIGNET BANK, VIRGINIA
Subject to
Verification

NORTHERN LOCK BOX

JUN 3 1987

ENTER TOTAL OF CHECKS LISTED

DOLE FOR PRESIDENT COMMITTEE, INC.

	DOLLARS	CENTS
CURRENCY		
COINS		
FRONT SIDE TOTAL		
REVERSE SIDE TOTAL		
TOTAL DEPOSIT	2000	00

DATE 6-3-87

:055001088: 652-00247197

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LAST NAME: Arthur Young PAC Check No. 501

SALUTATION: _____

ACKNOWLEDGMENT TYPE: N/A

Other Required Information _____

1000

BANKERS TRUST COMPANY
NEW YORK, N. Y.

ARTHUR YOUNG & COMPANY
POLITICAL ACTION COMMITTEE
277 PARK AVENUE • NEW YORK, N.Y. 10017

1 № 501

1-103
210

DATE May 21, 1987 $1,000.00

PAY ONE THOUSAND DOLLARS ---------- DOLLARS

TO THE ORDER OF Dole for President Exploratory Cmte.

ARTHUR YOUNG & COMPANY
POLITICAL ACTION COMMITTEE

Carl D Liggio
AUTHORIZED SIGNATURE

01 AD KS

⑈000501⑈ ⑆021001033⑆ 001⑈500269⑆⑈

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EXHIBIT C
Attachment 3
Page 3 of 29

(2)

DOLE FOR PRESIDENT COMMITTEE INC

0*

1,000.00+
100.00+
1,000.00+
003
2,100.00*

1-7-87

DATE 8-7-87
PROCESSOR SSun
REVIEWER DS

BATCH NUMBER 003306
DEP. CATEGORY IH PAC
TOTAL MAIL 3

CONTRIBUTORS 3

DOLLAR AMOUNT 2100.00

NON-CONTRIBUTORS 0

Bank of Virginia
A Signet Bank

CHECKING ACCOUNT DEPOSIT

ISSUED BY
DATE 8-7 19 87
CUSTOMER I.D.
APPROVED BY
FOR DEPOSIT TO THE ACCOUNT OF BANK OF VIRGINIA
SR. CODE
STREET
CITY
ACCOUNT NUMBER:

Subject to Verification

Checks and other items are received for deposit subject to the terms and conditions of the Bank's collection agreement.

SIGN HERE ONLY IF CASH RECEIVED FROM DEPOSIT

		DOLLARS	CENTS
CASH		003306	
CHECKS LIST SINGLY * BE SURE EACH ITEM IS ENDORSED	1	3	
	2	IH PAC	
	3		
	4	2100	00
TOTAL FROM OTHER SIDE			
SUB-TOTAL			
LESS CASH RECEIVED			
TOTAL ITEMS	TOTAL	2100	00

USE OTHER SIDE FOR ADDITIONAL LISTING

NORTHERN LOCK BOX
AUG 7 1987
BY

(20)

:0560=0408: "6520024719"

MF

CMR

23040955341

Please comply with the following guidelines:

1. Make all checks payable to Bob Dole for President.
2. Corporate checks are prohibited by law.
3. Federal law limits contributions to $1,000 per person.

( ) I will attend the reception for Bob Dole on July 20, 1987.

( ) Sorry, I cannot attend. Enclosed is my check for $1,000.

( ) Sorry, I am unable to attend.

NAME David Carney 1000 P-A-A-B-A-A-A
(Please Print)

ADDRESS 277 Park Avenue

CO./ORG. Arthur Young & Co.

CITY New York STATE NY ZIP 10017

Paid for by Dole for President Exploratory Committee.

Ak : WA

230409553342

BANKERS TRUST COMPANY
NEW YORK, N. Y.

ARTHUR YOUNG & COMPANY
POLITICAL ACTION COMMITTEE
277 PARK AVENUE • NEW YORK, N.Y. 10017

VERIFIED RJ (1) No. 504

1-103
210

DATE July 23, 1987 $1,000.00

PAY ONE THOUSAND DOLLARS ---------- DOLLARS

TO THE ORDER OF Robert Dole for President
c/o John Miller
Providence Mutual Ins. Co.
1600 Market Street
Philadelphia, PA 19103

ARTHUR YOUNG & COMPANY
POLITICAL ACTION COMMITTEE

Paul Thuggee
AUTHORIZED SIGNATURE

NCK PA

⑈000504⑈ ⑆021001033⑆ 001⑈500269⑆⑆

PLEASE LIST EACH CHECK SEPARATELY

	Dollars	Cents
009378	20354	50
IH PAC		
12 Items		

DEC 1987
Deposited by SIGNET BANK/VIRGINIA
Subject to Verification

NORTHERN LOCK BOX

DEC 1987

BY Eva Andrews

ENTER TOTAL OF CHECKS HERE →

DOLE FOR PRESIDENT COMMITTEE, INC.

	DOLLARS	CENTS
CURRENCY		
COINS		
FRONT SIDE TOTAL		
REVERSE SIDE TOTAL		
TOTAL DEPOSIT	20354	50

DATE 12-23-87

(7)

:056001089: 652-00247 19"

DOLE FOR PRESIDENT COMMITTEE INC

DATE 12-23-87 BATCH NUMBER 009378

PROCESSOR _____ DEP. CATEGORY IH PAC

VIEWER KL TOTAL MAIL 12

CONTRIBUTORS DOLLAR AMOUNT

12 20,354.50

-CONTRIBUTORS _____

230400955343

MF

BANKERS TRUST COMPANY
NEW YORK, N. Y.

ARTHUR YOUNG & COMPANY
POLITICAL ACTION COMMITTEE
277 PARK AVENUE • NEW YORK, N.Y. 10017

VERIFIED

No. 523

1-102
210

DATE December 9, 1987 $ 1,000.00

PAY ONE THOUSAND DOLLARS ---------- DOLLARS

TO THE ORDER OF Bob Dole for President

ARTHUR YOUNG & COMPANY
POLITICAL ACTION COMMITTEE

AUTHORIZED SIGNATURE

Carl Thuzer

[redacted] 86-MSCT

⑈000523⑈ ⑆021001033⑆ 001⑈500269⑆⑆⑈

23040955344

230409553345

BANKERS TRUST COMPANY
NEW YORK, N. Y.

ARTHUR YOUNG & COMPANY
POLITICAL ACTION COMMITTEE
277 PARK AVENUE • NEW YORK, N.Y. 10017

VERIFIED Nº 522

1-103
210

DATE December 9, 1987 $ 4,000.00

PAY FOUR THOUSAND DOLLARS---------- DOLLARS

TO THE ORDER OF Bob Dole for President

ARTHUR YOUNG & COMPANY
POLITICAL ACTION COMMITTEE

AUTHORIZED SIGNATURE

[illegible] ¢6-MSCT

⑈000522⑈ ⑆021001033⑆ 001⑉500269⑊⑈

EXHIBIT C
Attachment 3
Page 8 of 29

(10)

LAST NAME: Fluor Public Affairs Committee Check No. 001298

SALUTATION: _____

ACKNOWLEDGMENT TYPE: NA

Other Required Information Betty Hudson. 5000
Public Affairs PAC

930409553346

FLUOR PUBLIC AFFAIRS COMMITTEE

3333 MICHELSON DRIVE
IRVINE, CALIFORNIA 92730
TELEPHONE: (714) 975-2000

VERIFIED RH 2

№ 001298

16-313
1220

June 19, 1987

PAY TO THE ORDER OF * * * DOLE FOR PRESIDENT EXPLORATORY COMMITTEE * * * * | $ 5,000.00

EXACTLY $5000 AND 00 CTS DOLLARS

CALIFORNIA CANADIAN BANK
4500 JAMBOREE BLVD. 714-752-6042
NEWPORT BEACH, CALIFORNIA 92660

07 RH DC

⑈001298⑈ ⑆122003134⑆ 0057303083⑈

HARLAND 812

Fetch # 1954

FLUOR PUBLIC AFFAIRS COMMITTEE

3333 MICHELSON DRIVE
IRVINE, CALIFORNIA 92730
TELEPHONE: (714) 975-2000

9

VERIFIED RA

№ 001319

18-312
1220

10/16 19 87

PAY TO THE ORDER OF BOB DOLE FOR PRESIDENT

$ 2,000.00

TWO THOUSAND DOLLARS AND 00/100 XXXX

23040955348

Batch #
7384

GOOD GOVERNMENT FEDERAL
POLITICAL ACTION COMMITTEE
444 S. FLOWER ST.
LOS ANGELES, CA 90017

2

151

10/28 19 87 16-105/1220

PAY TO THE ORDER OF DOLE FOR PRESIDENT $*1,000.00

ONE THOUSAND DOLLARS AND 00/100 DOLLARS

BANKCAL THE BANK OF CALIFORNIA
Los Angeles Main Office
550 South Flower Street
Los Angeles, California 90071

VOID SIX MONTHS AFTER DATE OF ISSUE

MEMO GGFPAC

Richard A Fink

⑈122001055⑈ 151⑈032⑈338053⑈

Batch #
7605

GOOD GOVERNMENT FEDERAL
POLITICAL ACTION COMMITTEE
444 S. FLOWER ST.
LOS ANGELES, CA 90017

VERIFIED m-3

152

10/29 19 87

16-105/1220

PAY TO THE ORDER OF DOLE FOR PRESIDENT

$ *1,000.00

ONE THOUSAND DOLLARS AND 00/100 DOLLARS

BANKCAL THE BANK OF CALIFORNIA
Los Angeles Main Office
350 South Flower Street
Los Angeles, California 90071

VOID SIX MONTHS AFTER DATE OF ISSUE

MEMO JWJMCA

⑈220010551⑈ 152⑆032⑆338053⑈

93040955349

EXHIBIT C
Attachment 3
Page 12 of 29

(7)

HARTFORD INSURANCE GROUP - P.A.C.
FEDERAL ACCOUNT
HARTFORD PLAZA
HARTFORD, CT 06115

229

September 3, 19 87 — 81-65 / 119

PAY TO THE ORDER OF Dole for President Committee — $ 2,000.00

Two-thousand dollars 00/100 ---------- DOLLARS

United Bank & Trust Company
Hartford, Connecticut

FOR 01- RANY

Lorraine K Zlotnick
Joyce M. Fox

⑈000229⑈ ⑆011900652⑆ 08⑈872 932 8⑈

⑈4707

⑆304095553⑆

HARTFORD INSURANCE GROUP - P.A.C.
FEDERAL ACCOUNT
HARTFORD PLAZA
HARTFORD, CT 06115

VERIFIED BA

242

February 22, 19 88

51-65
119

PAY TO THE ORDER OF DOLE for President Committee $ 5,000.00

Five-thousand dollars 00/100 ---------- DOLLARS

United Bank & Trust Company
Hartford, Connecticut

FOR 01-RANY

Roger M. Dow

⑈000242⑈ ⑆011900652⑆ 08-872 932 8⑈

12537

23040955351

LAST NAME: Johnston for Congress Check No. 55

SALUTATION:

ACKNOWLEDGMENT TYPE: NA

Other Required Information Eugene Johnston
338 North Elm Street
Greensboro, North Carolina 27401

1000

Executive
Johnston Properties.

Batch # 1800

23040955353552

First Union National Bank
Greensboro, North Carolina 27402

2 - 55

June 8 1987 66-858/531

PAY TO THE ORDER OF Dole for President Exploratory Committee $1,000.00

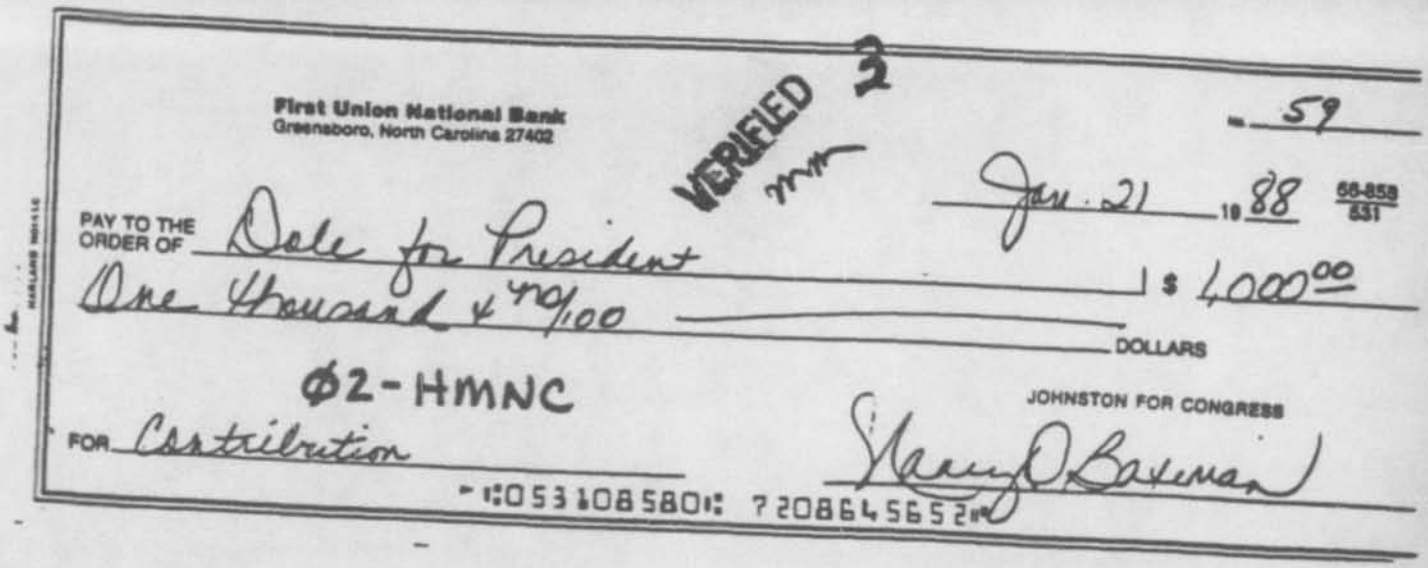
One Thousand + 00/100 DOLLARS

JOHNSTON FOR CONGRESS

FOR Contribution 86-88-87

Nancy D. Bateman

⑆053108580⑆ 7208645652⑈



First Union National Bank
Greensboro, North Carolina 27402

VERIFIED 3

59

Jan. 21 19 88 56-858 631

PAY TO THE ORDER OF Dole for President

$ 4,000.00

One Thousand & no/100 DOLLARS

Ø2-HMNC

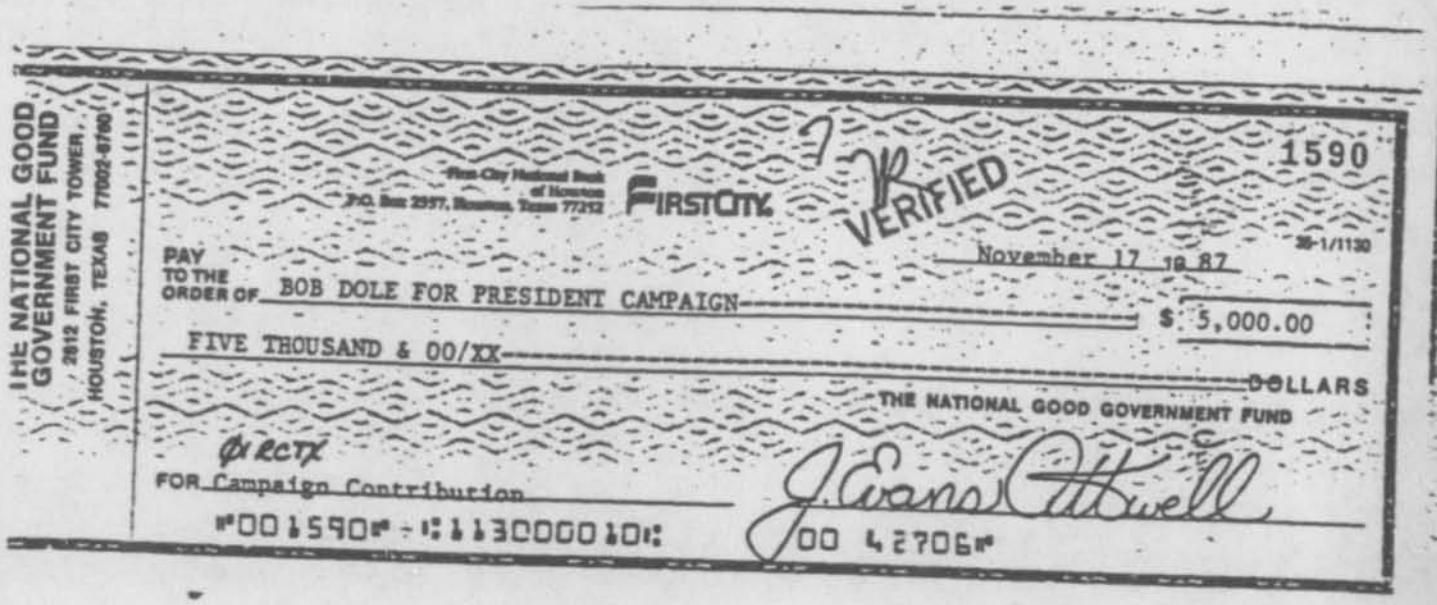
FOR Contribution

JOHNSTON FOR CONGRESS

Nancy D Bateman

⑆053108580⑆ 7208645652⑈

23040955353



THE NATIONAL GOOD GOVERNMENT FUND
2812 FIRST CITY TOWER
HOUSTON, TEXAS 77002-6760

First City National Bank of Houston
P.O. Box 2557, Houston, Texas 77252
FIRSTCITY

VERIFIED

1590

35-1/1130

November 17 19 87

PAY TO THE ORDER OF BOB DOLE FOR PRESIDENT CAMPAIGN $ 5,000.00

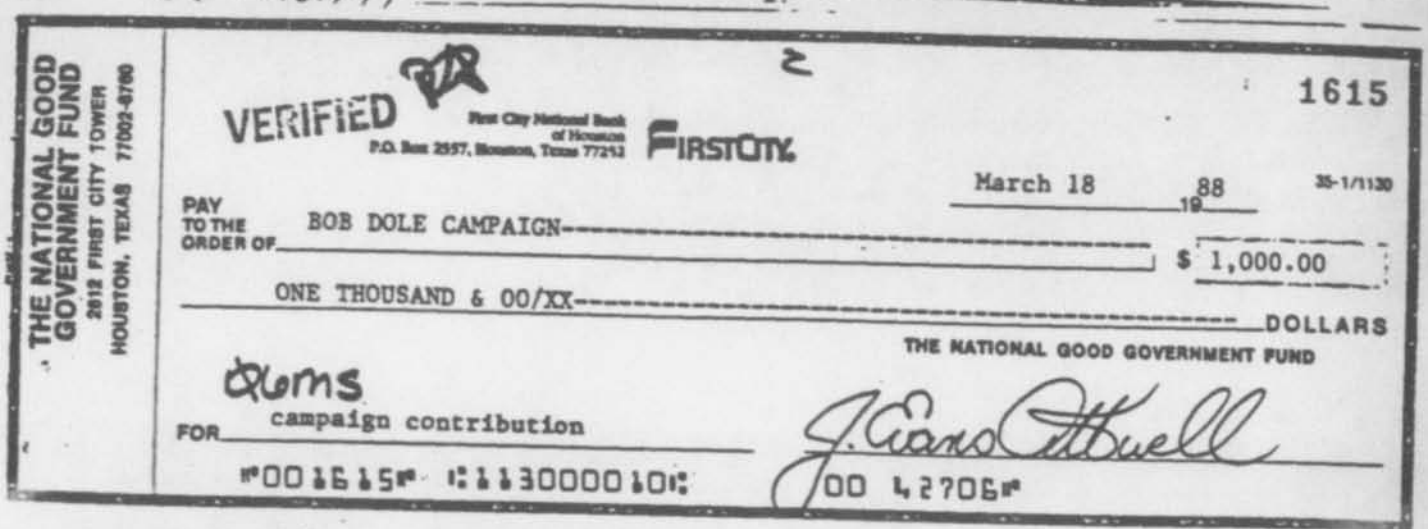
FIVE THOUSAND & 00/XX DOLLARS

THE NATIONAL GOOD GOVERNMENT FUND

FOR Campaign Contribution

J. Evans Attwell

"001590" :113000010: 00 42706"



THE NATIONAL GOOD GOVERNMENT FUND
2812 FIRST CITY TOWER
HOUSTON, TEXAS 77002-6760

VERIFIED

First City National Bank of Houston
P.O. Box 2557, Houston, Texas 77252
FIRSTCITY

1615

35-1/1130

March 18 19 88

PAY TO THE ORDER OF BOB DOLE CAMPAIGN $ 1,000.00

ONE THOUSAND & 00/XX DOLLARS

THE NATIONAL GOOD GOVERNMENT FUND

FOR campaign contribution

J. Evans Attwell

"001615" :113000010: 00 42706"

73040955354

2304095555

Batch # 7996

(5)

NON PARTISAN POLITICAL
SUPPORT COMMITTEE
FOR GENERAL ELECTRIC
COMPANY EMPLOYEES
FAIRFIELD, CT 06431

9 MP VERIFIED

4453

PAY TO THE ORDER OF Dole for President Committee, Inc.

November 12, 19 87

51-32/211 85

$ **5000.00**

**Five thousand and 00/100---------- DOLLARS

Connecticut National Bank Ø6-DCBE

Robert W. Nelson

David F St. Fauvent

FOR (C00213850) 1988 Presidential - Primary
Earmarked

"004453" :021100329: 0E07 9180"

23040955356

(5)

NON PARTISAN POLITICAL SUPPORT COMMITTEE
FOR GENERAL ELECTRIC COMPANY EMPLOYEES
FAIRFIELD, CT 06431

4463

1

VERIFIED mm

51-32/211 85

December 3, 19 87

PAY TO THE ORDER OF Dole for President Committee, Inc. $ **1000.00**

**One thousand and 00/100 DOLLARS

Connecticut National Bank
07PMCT

Robert W. Nelson
David F St. Laurent

FOR (C00213850) Presidential Primary
Earmarked

⑈004463⑈ ⑆021100329⑆ 0607 9180⑈

Batch # 9438

23040955357

NON PARTISAN POLITICAL
SUPPORT COMMITTEE
FOR GENERAL ELECTRIC
COMPANY EMPLOYEES
FAIRFIELD, CT 06431

4507

VERIFIED

February 1, 19 88

PAY TO THE ORDER OF Dole for President Committe, Inc. $ **1000.00**

**One thousand and 00/100---------- DOLLARS

Connecticut National Bank 06-MSCT

Robert W. Nelson

FOR (C00213850) 1988 Presidential Compliance Fund

Earmarked

⑈004507⑈ ⑆021100329⑆ 0607 9180⑈

No record of this going to Compl. Fund.
Reported by DFP as being deposited 2/12/88

Batch # 9378

(1)

Small BIZ-PAC
208 G Street, NE
Second Floor
Washington, D.C. 20002

VERIFIED MR

No. 50

November 23 1987

88-111
560

PAY TO THE ORDER OF Dole for President Committee

One Thousand and 00/100---------- $ 1,000.00 ----------DOLLARS

FIRST VIRGINIA BANK
FALLS CHURCH, VIRGINIA

FOR 01-HSTX

Barbara L. Saunders

⑆056001118⑆ 0367 5548⑈

C00409555358

DEPOSIT TICKET

Please be sure all items are properly endorsed. List checks separately.
FOR CLEAR COPY PRESS FIRMLY WITH BALL POINT PEN

DATE 3/11 19 88

CURRENCY

COIN

CHECKS

IH

441564 10,765

Batch #

DOLE FOR PRESIDENT

:053600408: 652=0024719=

MAR 1988

Processed by
SIGNET BANK/VIRGINIA

Subject to
Verification

10,765 —

10,765

TOTAL ITEMS 1

SIGNET BANK
Virginia

53-408
560

9300409553559

LAST NAME: Small BIZ-PAC CHECK NO. 51

SOLICITATION NAME:

SALUTATION:

ACKNOWLEDGMENT TYPE: NA

Other Required FEC Information:

Deposited 3/11/88

23040955360

Small BIZ-PAC
208 G Street, NE
Second Floor
Washington, D.C. 20002

4 No. 51

PAY TO THE ORDER OF Dole for President Committee May 11, 1988 88-11 560

Four Thousand and 00/100---------- $ 4,000.00

FIRST VIRGINIA BANK
FALLS CHURCH, VIRGINIA

FOR 01-HSTX Carla Saunders

⑆056001188⑆ 0367 5548⑈

C-04
11

(3)

LAST NAME: Dole

SALUTATION: Bob

Check No. 1404

06-EB-07

ACKNOWLEDGMENT TYPE: N A

Other Required Information

PAC

1000

SOUTHWESTERN BELL CORPORATION 0684
EMPLOYEE FEDERAL POLITICAL ACTION COMMITTEE
ONE BELL CENTER, ROOM 29-S-8
ST. LOUIS, MO 63101

1404

80-458/819

PAY TO THE ORDER OF Bob Dole for President Exploratory Committee

May 22, 1987

$ 1,000.00

ONE THOUSAND AND NO/100---------- DOLLARS

Commerce Bank of St. Louis
St. Louis, Missouri

FOR Primary 06-EB-07

Michael Kenfield

⑈001404⑈ ⑆081004591⑆ 083114022⑈

Batch # 107!

930409553361

(3)

LAST NAME: Sw Bell Corp. PAC Check No. 1414

SALUTATION: _____

ACKNOWLEDGMENT TYPE NA

Other Required Information _____ PAC

_____

_____

---------- 1000

23040955362

SOUTHWESTERN BELL CORPORATION 0884
EMPLOYEE FEDERAL POLITICAL ACTION COMMITTEE
ONE BELL CENTER, ROOM 29-S-8
ST. LOUIS, MO 63101

3

1414

80-458/810

PAY TO THE ORDER OF Bob Dole for President Exploratory Committee June 26, 1987

ONE THOUSAND AND NO/100---------- $ 1,000.00 DOLLARS

Commerce Bank of St. Louis

FOR Presidential Primary 00-TC-F7

⑈001414⑈ ⑆081004591⑆ 083114022⑈

Michael Kaufman

Batch # 1904

(3)

LAST NAME: S.W. Bell PAC

SALUTATION: ~~Dear~~ Sirs

Check No. 1413

ACKNOWLEDGMENT TYPE NA

375

Other Required Information

PAC

SOUTHWESTERN BELL CORPORATION 0884
EMPLOYEE FEDERAL POLITICAL ACTION COMMITTEE
ONE BELL CENTER, ROOM 29-S-8
ST. LOUIS, MO 63101

4

1413

80-458/810

PAY TO THE ORDER OF Bob Dole for President Exploratory Committee

June 19, 19 87

$ 375.00

Three Hundred Seventy Five And No/100---------- DOLLARS

Commerce Bank of St. Louis

FOR Primary Election 06-TC-F7

⑈001413⑈ ⑆081004598⑆ 08311402 2⑈

Michael Kaufman

Batch # 1975

30409553663

(3)

Batch # 3802

LAST NAME: SW Bell Corp PAC CHECK NO. 1417

SALUTATION: _____

ACKNOWLEDGMENT TYPE: NA 1000

Other Required FEC Information: _____

93040955364

SOUTHWESTERN BELL CORPORATION 0884
EMPLOYEE FEDERAL POLITICAL ACTION COMMITTEE
ONE BELL CENTER, ROOM 29-S-8
ST. LOUIS, MO 63101

1417

80-458/810

PAY TO THE ORDER OF Bob Dole for President July 23, 1987 $ 1,000.00

ONE THOUSAND AND NO/100---------- DOLLARS

Commerce Bank of St. Louis

FOR Presidential Primary 91-JHKS

⑈001417⑈ ⑆081004591⑆ 08311402 2⑈

(3)

SOUTHWESTERN BELL CORPORATION 0684
EMPLOYEE FEDERAL POLITICAL ACTION COMMITTEE
ONE BELL CENTER, ROOM 29-S-8
ST. LOUIS, MO 63101

VERIFIED (1)

1452

80-458/810

October 21, 1987

PAY TO THE ORDER OF Bob Dole for President $ 1,000.00

ONE THOUSAND AND NO/100---------- DOLLARS

Commerce Bank of St. Louis

FOR Primary - Presidential

⑈001452⑈ ⑆081004596⑆ 0831640228

Michael Kaufman

930409553365

Batch #704

SOUTHWESTERN BELL CORPORATION 0684 VERIFIED 2 1456
EMPLOYEE FEDERAL POLITICAL ACTION COMMITTEE
ONE BELL CENTER, ROOM 29-S-6
ST. LOUIS, MO 63101

80-468/810

November 13, 19 87

PAY TO THE ORDER OF Dole for President Committee $ 1,000.00

ONE THOUSAND AND NO/100---------- DOLLARS

Commerce Bank of St. Louis
St. Louis, Missouri

FOR Primary '96 DC BE

⑈001456⑈ ⑆081004596⑆ 083144022⑈

Batch # 143

23040955366

Batch # 12767

TCI PAC
CALL BOX 22595, WELLSHIRE STATION
DENVER, COLO. 80222

106

3/3/1988

23-347/1020

PAY TO THE ORDER OF Dole for President Committee $ 1,000.00

One Thousand and NO/100's DOLLARS

COLORADO NATIONAL BANK
TECH CENTER
8401 East Belleview (303) 771-7071
Denver Colorado 80237

MEMO

Colin R. Stone

Gary K. Bauer

⑆102003471⑆0106 ⑈014146⑈

930409553567

Batch # 8154

TCI PAC
CALL BOX 22595, WELLSHIRE STATION
DENVER, COLO. 80222

104

11/3/1987

23-347/1020

PAY TO THE ORDER OF Dole for President Committee $ 2,000.00

Two Thousand and NO/100's DOLLARS

COLORADO NATIONAL BANK
TECH CENTER
8401 East Belleview (303) 771-7071
Denver Colorado 80237

MEMO OLEALDR 01-JHIA

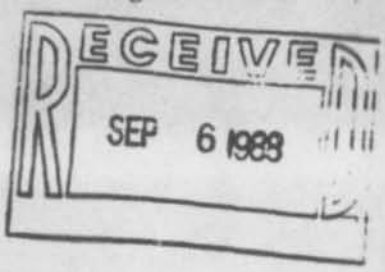
Colin R. Stone

⑆102003471⑆0104 ⑈014146⑈

Exhibit C
Attachment 4
Page 1 of 1

160th

August 9, 1988



Mrs. Frances E. Adams
1213 W. 29th Terrace
Brewster West Cottage 3
Topeka, KS 66611

Dear Mrs. Frances E. Adams:

You may recall that earlier in the campaign you contributed, either directly or through reattribution, to Senator Dole's general election "Legal and Accounting Compliance Fund". This money was to be used to help Senator Dole meet the requirements of various federal statutes and regulations.

Now that Senator Dole is no longer in the race for the Republican nomination for president, it is necessary that his committee either refund your contribution from this account or seek your reattribution to Senator Dole's "Post-primary Obligation Fund". DFP is establishing this fund to pay any fines or penalties the Federal Election Commission might levy against Senator Dole and Dole for President after the completion of the FEC's current audit.

This fund is permitted under 11 CFR 9034.4(b)(4) of the Federal Election Commisssion regulations. Of course, if you would prefer, DFP will promptly refund your contribution. Which ever you decide, will you please take a few moments right now to check the appropriate box below and return it in the enclosed postage-paid envelope?

As always, thank you so much for your continued support. I am sorry that this is somewhat confusing but such is the nature of complying with the regulations of the Federal Election Commission.

Sincerely,

Scott

Scott E. Morgan
Chief Counsel

X YES, I want to attribute my previous contribution to the Dole for President "Legal and Accounting Compliance Fund" to the Dole for President "Post-primary Obligation Fund". My signature below indicates my agreement with this reattribution.

Frances E. Adams
(please sign here for reattribution)

_____ NO, I prefer to have my contribution refunded directly to me at the above address.

23040955369

Allocation of Expenditures to States

Sections 441a(b)(1)(A) and 441a(c) of Title 2 of the United States Code provide, in part, that no candidate for the office of President of the United States, who is eligible under Section 9033 of Title 26 to receive payments from the Secretary of the Treasury, may make expenditures in any one State aggregating in excess of the greater of 16 cents multiplied by the voting age population of the State, or $200,000, as adjusted by the change in the Consumer Price Index.

Section 106.2(a)(1) of Title 11 of the Code of Federal Regulations states, in part, that except for expenditures exempted under 11 C.F.R. §106.2(c), expenditures incurred by a candidate's authorized committee(s) for the purpose of influencing the nomination of that candidate for the office of President with respect to a particular State shall be allocated to that State. In the event that the Commission disputes the candidate's allocation or claim of exemption for a particular expense, the candidate shall demonstrate, with supporting documentation, that his or her proposed method of allocation or claim of exemption was reasonable. Further, 11 C.F.R. §106.2(c) describes the various types of activities that are exempted from State allocation.

Section 106.2(c)(5) of Title 11 of the Code of Federal Regulations states, in part, that an amount equal to 10% of campaign workers salaries and overhead expenditures in a particular State may be excluded from allocation to that State as an exempt compliance cost. An additional amount equal to 10% of such salaries and overhead expenditures in a particular State may be excluded from allocation to that State as exempt fundraising expenditures, but this exemption shall not apply within 28 calendar days of the primary election.

Section 106.2(b)(2)(iv) of Title 11 of the Code of Federal Regulations states, in part, that overhead expenditures include, but are not limited to, rent, utilities, office equipment, furniture, supplies, and telephone service base charges.

For the 1988 election, the expenditure limitation for the State of Iowa was $775,217.60 and for the State of New Hampshire was $461,000.00. The Committee provided computerized worksheets to the Audit staff that indicated allocable costs to Iowa and New Hampshire of $793,230.82 and $462,462.20 respectively, as of October 31, 1988. These totals agreed with the totals disclosed by the Committee on its FEC Form 3P, Page 3 as of March 31, 1989.

The Audit staff reviewed the Committee's allocation worksheets and analyzed the Committee's allocation methods. Based on this review the following additions to the Committee's allocation totals are required.

1. Twenty-Five Percent Fundraising Exemption - Travel, Events - Senator Dole and Events - Elizabeth Dole

The Committee applied a 25 percent fundraising exemption to the following expense code categories: Travel (Intra-state), Events - Senator Dole, and Events - Elizabeth Dole. The Committee did not apply the exemption to expenses within 28 days of either primary election.

The Committee Treasurer stated that the 25 percent exemption was taken to reflect the fundraising efforts associated with these three categories. He explained that whenever Senator Dole and Elizabeth Dole were traveling, they would make a request for contributions. Twenty-five percent was selected by the Committee as a "reasonable" judgment of what these requests were worth to the Committee's fundraising efforts. No explanation for the inclusion of the Travel category in this calculation was offered by the Committee. No other evidence to support this exemption was provided.

Neither the Act nor the Commission's Regulations provide for a fundraising exemption for these expense categories. In the Interim Audit Report, the Audit staff noted that in the staff's opinion the Committee had not demonstrated that 25 percent fundraising exemption is reasonable. It was also noted that, absent the submission of documentary evidence to demonstrate that these exemptions are reasonable, the amounts excluded by the Committee from the Iowa and New Hampshire expenditure limitations ($28,450.36 and $13,997.06, respectively) had been included in the Audit staff's calculation. Finally, the Committee was requested to submit evidence which revealed the nature of the fundraising appeal for each event, how the appeal was delivered and the amount of resulting contributions.

In response to the Interim Audit Report, the Committee Treasurer cites 11 C.F.R. §100.8(b)(21)(i) which he quotes as follows:

"'Any costs incurred by a candidate...in connection with the solicitation of contributions are not expenditures if incurred by a candidate who has been certified to receive Presidential Primary Matching Fund Payments...'" He continues that "'[i]n connection with the solicitation of contributions' is defined at 11 C.F.R. §100.8(b)(21)(ii) as meaning'...any cost

2304095537 0

reasonably related to fundraising activity...'" The Treasurer states that "without the transportation of Senator and Secretary Dole through Iowa and New Hampshire, its fundraising appeal would have been zilch."

In response to the Audit staff's Interim Audit Report request for evidence which reveals the nature of the fundraising appeal for each event, how the appeal was delivered and the amount of resulting contributions, the Committee states that "[t]he nature of the fundraising appeal was 'Please give money,' the appeal was delivered by voice and the amount received is irrelevant." The Treasurer further argues that the direct costs listed in 11 C.F.R. §100.8(b)(21)(ii) are not exclusive and that they must only be reasonably related to fundraising. He adds that "[t]he fact that the Audit staff does not believe the transportation and event costs associated with the Senator and Secretary represent 'reasonable' fundraising costs does not preclude them from being such costs" and adds that the Committee took only 25% of these costs as exempt.

The Treasurer concludes that without these costs, the Committee would not have raised much money and that "a reasonable person might believe that 25% of such costs were reasonably associated with fundraising."

The Audit staff reiterates that in order to exempt from allocation the expenditures included in the three categories discussed above, documentation supporting a fundraising appeal which can be associated with the expenditures is necessary. Since no such documentation was provided in the Committee's response to the Interim Audit Report, no adjustment to the allocations has been made.

2. Fundraising Exemptions - Direct Mail Costs

The Committee separated their direct mail costs into two categories: Postage/Printing and Newsletter/Postcards. For allocation purposes, the Committee excluded a percentage of these direct mail costs as fundraising. This percentage varied from item to item.

The Audit staff reviewed the documentation related to the Iowa and New Hampshire direct mail costs which had been given fundraising exclusions by the Committee to determine if these exclusions were supported. These mailings were targeted for these two states. The auditors did not accept the fundraising exclusions for the costs which had no solicitation samples available to review or for costs which had solicitation samples without a request for funds.

23040955371

The Committee excluded the following amounts as the fundraising share of the direct mail costs:

Iowa	$217,643.73
New Hampshire	$ 43,877.56

Based on the Audit staff's review of supporting documentation regarding these direct mail costs, we were able to verify $23,369.76 of the $217,643.73 excluded by the Committee for Iowa, leaving the solicitation of funds unverified for direct mail costs of $194,273.97 ($217,643.73 - $23,369.76). The Audit staff applied a 100% fundraising allocation to the $23,369.76 of direct mail costs which contained a fundraising appeal resulting in a credit of $20,370.42 for items not allocated 100% by the Committee. The adjusted unverified Iowa total is $173,903.55 ($194,273.97 - $20,370.42).

The Audit staff reviewed the Committee's allocation worksheets regarding Iowa direct mail costs and noted purposes such as postcards announcing town meetings, Iowa newsletters, announcement letters, etc.

For New Hampshire, the Audit staff was able to verify $129.50 of the $43,877.56 excluded by the Committee. In addition, the Committee includes an adjusting journal entry in the amount of $(6,418.91) for which no support has been provided. Therefore, the Audit staff was unable to verify $43,748.06 of the $43,877.56 excluded by the Committee for New Hampshire ($43,877.56 - $129.50). The Audit staff applied a 100% fundraising allocation to the $129.50 of direct mail costs which contained a fundraising appeal resulting in a credit of $129.50 for items not allocated 100% by the Committee. The adjusted unverified New Hampshire total is $43,618.56 ($43,748.06 - $129.50).

The Committee was provided copies of workpapers in support of the auditors' figures.

The Committee's response to the Interim Audit Report includes explanations and documentation related to Iowa direct mail costs which the Committee believes documents a 50% fundraising exemption for several items noted as unverified by the auditors.

Based on our review of this information, the Audit staff has determined that of the $173,903.55 noted as unverified Iowa direct mail costs, $121,967.77 of these costs contained a direct fundraising appeal. Included in this amount is postage which as a result of material submitted can be associated with a particular solicitation. Included in this amount is postage which as a result of documents submitted can be associated with a

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particular solicitation. The remaining $51,935.78 ($173,903.55 - $121,967.77) is still unverified and is allocable to the Iowa state limit.

The Committee's response did not address the $43,618.56 of unverified New Hampshire direct mail costs and therefore $43,618.56 is allocable to the New Hampshire state limit.

It should be noted that the Audit staff applied 100% of the direct mail costs which contained a fundraising appeal to exempt fundraising, as opposed to the 50% requested by the Committee.

3. Allocation of Intra-State Phone Calls Paid for With Telephone Credit Cards

Section 106.2(a)(1) of Title 11 of the Code of Federal Regulations states, in part, that expenditures incurred by a candidate's authorized committee(s) for the purpose of influencing the nomination of that candidate for the office of President with respect to a particular State shall be allocated to that State.

The Audit staff reviewed Committee headquarters telephone bills from April 1987 through March 1988 to determine the total amounts of intra-state phone calls made in Iowa and New Hampshire which were charged on Committee telephone credit cards. The Committee did not allocate these intra-state calls to the appropriate states. No explanation for this omission was provided by the Committee.

The total of intra-state calls, adjusted for the 10% compliance and 10% fundraising exemptions, are as follows:

Iowa	$23,280.46
New Hampshire	$ 1,696.44

In the Committee's response to the Interim Audit Report, the Committee states that they agree with these allocations.

4. Phone Bank Operations

Section 106.2(a)(1) of Title 11 of the Code of Federal Regulations states, in part, that expenditures incurred by a candidate's authorized committee(s) for the purpose of influencing the nomination of the candidate for the office of the President with respect to a particular State shall be allocated to that State. An expenditure shall not necessarily be allocated to the State in which the expenditure is incurred or paid.

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Section 110.8(c)(2) of Title 11 of the Code of Federal Regulations states that for State limitations, expenditures for fundraising activities targeted at a particular State and occurring within 28 days before that state's primary election, convention or caucus shall be presumed to be attributable to the expenditure limitation for that State.

The Committee had a phone bank operation located in Kansas City, Kansas from July 1987 through February 1988 and another in Wisner, Nebraska from October 1987 through February 1988. The auditors requested copies of the phone bank scripts but the Committee never provided them.

Kansas City Phone Bank

The Audit staff reviewed U.S. Sprint telephone invoices which contained 42,544 phone calls from the Kansas City phone bank, of which 5,587 (13%) were calls made to Iowa telephone numbers. The total cost of the Iowa calls was $1,054.80. Calls made to New Hampshire were determined to be immaterial.

To derive the Iowa share of the other related phone bank costs, the Audit staff applied the 13% (Iowa percentage) to the other cost categories on the phone bills: Federal Excise Tax, Features Federal Taxes, Wats Equipment Charge and Volume Discount. The total Iowa share of these costs is $73.01. The 13% was then applied to Rent, Salaries, and Reimbursements related to the phone bank. These costs were also adjusted for the 10% compliance and 10% fundraising exemptions. The total Iowa share of these costs is $2,328.30. The total Iowa portion of the Kansas City phone bank is therefore $3,456.11 ($1,054.80 + $73.01 + $2,328.30).

The Committee did not allocate any of the costs associated with the Kansas City phone bank to Iowa. At the exit conference, the Treasurer stated that the Kansas City phone bank was set up to influence the entire country and therefore, the costs are not allocable to Iowa. He cited 11 C.F.R. §106.2(b)(2)(v) which states that expenditures for telephone calls between two States need not be allocated to any State.

The Committee was provided with copies of workpapers in support of the auditors' figures at the exit conference.

In the response to the Interim Audit Report, the Committee stated that they agreed with the Audit staff's allocation of $73.01 to Iowa as the Iowa share of the other related Kansas City phone bank costs. They also agreed with the allocation of $2,328.30 to Iowa as the Iowa share of Rent, Salaries and Reimbursements related to the Kansas City phone bank.

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However, the Committee did not agree with the allocation to Iowa of $1,054.80 of Iowa telephone call charges made from the Kansas City phone bank. The Committee cited 11 C.F.R. §106.2(b)(2)(v) which states that expenditures for telephone calls between two states need not be allocated to any state. The Committee asserted that "DFP fails to see how such plain language can be interpreted in any way except to exempt toll charges from state allocation."

The Committee added that they did not find any language in the Regulations or appropriate Explanations and Justifications, as cited by the auditors in the Interim Audit Report, that refuted the "plain meaning" of 11 C.F.R. §106.2(b)(2)(v).

The Committee also cited 11 C.F.R. §106.2(b)(1) which states that unless otherwise specified under 11 C.F.R. §106.2(b)(2), an expenditure incurred by a candidate's authorized committee(s) for the purpose of influencing the nomination of that candidate in more than one state shall be allocated to each state on a reasonable and uniformly applied basis. The Committee then noted that "[i]n case anyone wonders if the toll charges involved here qualify as an 'expenditure' for interstate calls, it should be noted that DFP paid the cost of these calls directly and that no third party was involved.

The Committee Treasurer additionally quoted the Explanation and Justification from the February 4, 1983 Federal Register which states that "Subsection (b)(2)(v) sets forth a new method for allocating telephone charges other than base service charges. All calls made within a particular State must be allocated to that State. Calls made between two States, whether or not using toll free service, are exempted from allocation." He added that the phrase "are exempted from allocation" was simple to understand. The Committee Treasurer continued that "[i]n the 1987 rewrite of many of the state allocation regulations the Commission again states that '[i]nter-state calls remain exempt from allocation under paragraph (b)(2)(v).'" He added that "I again do not see any meaning beyond what that simple statement states" and that "[t]he Commission specifically considered the exemption and chose not to change the language."

A similar issue arose in the audit of the 1984 presidential campaign of Senator John Glenn. In that case, the Final Audit Report stated that the interstate telephone call exemption was designed to eliminate the problems of trying to allocate telephone calls between offices of a campaign committee.

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Eventually, the dispute over these costs went to litigation. John Glenn Presidential Committee v. FEC, 822 F.2d 1097 (D.C. Cir. 1987). The Commission maintained that the regulation only applies when an expenditure is directed at attracting voters in more than one state. The court accepted this as a "rational explanation of the Commission's regulations." 822 F.2d at 1102. Since Iowa voters alone were the objectives of the telephone expenses, the court held that the "Commission reasonably concluded that the governing prescription was contained in 11 C.F.R. §106.2(a)(1)." 822 F.2d at 1102.

Since the telephone calls from the Kansas City phone bank were not exclusively targeted to Iowa, the Commission has determined that the $1,054.80 of telephone charges for calls made to Iowa are not allocable to the Iowa spending limitation. However, the $2,401.31 ($73.01 + $2,328.30) of other costs associated with the Kansas City phone bank are allocable to Iowa which the Committee agreed with in their response to the Interim Audit Report.

Nebraska Phone Bank

The Committee had a phone bank operation in Wisner, Nebraska.*/ The Audit staff reviewed the Great Plains Communication telephone invoices which contained 445,914 toll calls. Of these calls 338,675 (75.95%) were calls made to Iowa phone numbers. The cost of these Iowa calls was $106,612.38.

To derive the Iowa share of the other related phone bank costs, the Audit staff applied the 75.95% (Iowa percentage) to the other cost categories on the phone bills: Equipment Charges, Federal Tax, Volume Discount and Telephone Facility Fee. The total Iowa share of these costs is a credit of $(2,452.73). The 75.95% was then applied to Salaries and Overhead Costs related to the phone bank. These costs were adjusted for the 10% compliance and 10% fundraising exemptions. The total Iowa share of these costs is $64,634.96. The total Iowa portion of the Nebraska phone bank is therefore $168,794.61 ($106,612.38 + $(2,452.73) + $64,634.96).

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*/ Wisner, Nebraska is located in northeast Nebraska about 40 miles from the Iowa border.

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During the fieldwork the Committee Treasurer stated that they allocated phone bank salaries and overhead costs to Iowa but that the telephone calls made from the phone bank to Iowa were not allocated to Iowa because they were considered interstate calls and therefore not allocable pursuant to 11 C.F.R. §106.2(b)(2)(v).

At the exit conference the Treasurer reiterated that in his opinion, calls from Nebraska to Iowa were not allocable to Iowa and the Committee had complied with the regulations. The Audit staff explained that in our opinion, the phone bank was set up primarily to target Iowa and therefore all calls to Iowa are allocable to Iowa.

Based on the rationale as set forth above, the Commission has determined that since telephone calls from the Nebraska phone bank were not exclusively targeted to Iowa, the $106,612.38 of telephone charges for calls made to Iowa are not allocable to the Iowa spending limitation. Since the Committee allocated $64,136.94 in non-telephone costs to Iowa from the Nebraska phone bank, the Audit staff concludes that a credit in the amount of $(1,954.71) ($64,634.96 + ($2,452.73) - $64,136.94) should be applied to the Committee's Iowa allocations.

Conclusion

The Committee agrees with the Audit staff's additional allocation related to the Kansas City phone bank for costs associated with the phone calls made to Iowa. After the deletion of the Iowa phone calls, the allocation to the Iowa spending limitation for the Nebraska phone bank is overstated by a similar amount. The resulting change to the existing allocations is immaterial.

5. New England (NE) Regional Office

Section 106.2(b)(2)(iv)(B) of Title 11 of the Code of Federal Regulations states, in part, that except for expenditures exempted under paragraph (c) of this section, overhead expenditures of a committee regional office or any committee office with responsibilities in two or more States shall be allocated to each State on a reasonable and uniformly applied basis. For purposes of this section, overhead expenditures include but are not limited to, rent, utilities, office equipment, furniture, supplies and telephone service base charges.

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Section 106.2(a)(1) of Title 11 of the Code of Federal Regulations states, in part, that in the event that the Commission disputes the candidate's allocation or claim of exemption for a particular expense, the candidate shall demonstrate, with supporting documentation, that his or her proposed method of allocation or claim of exemption was reasonable.

The Committee maintained an office in Manchester, New Hampshire which they treated as a regional office for six states in New England. The six states, along with the Committee's allocation percentages, and their respective primary/caucus dates are as follows:

New Hampshire (60%)	2/16/88
Massachusetts (20%)	3/08/88
Maine (5%)	2/26/88
Vermont (5%)	3/01/88*/
Rhode Island (5%)	3/08/88
Connecticut (5%)	3/29/88

The Committee Treasurer stated that the allocation percentages were developed in the Fall of 1987 and were based on a weighted average of anticipated hours to be worked by "regional" staff persons on each of the six states. The Audit staff asked if any adjustments to these percentages were made by the Committee during the operation of the regional office or after it ceased to exist to reflect actual experience. The Treasurer responded that no adjustments were made.

A request was made by the auditors that the Committee provide any planning documents used for the set-up and operation of the Manchester office as the NE Regional Office. The Committee Treasurer stated he would attempt to locate any documentation related to the planning of the regional office.

In an attempt to evaluate the reasonableness of the Committee's allocation of the Manchester office as the NE Regional Office, the auditors performed a number of analyses to identify the activities which related to the states involved.

a. Review of Payroll and Overhead Costs

A review was performed to identify payroll and overhead costs which the Committee allocated directly to the six states. With this information, a determination was to be made as to the extent the Committee offices located in the NE Region functioned autonomously.

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*/ Non-binding Primary. Republican Caucus - 4/26/88.

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The Committee allocated $123,550.54 of payroll costs (Salaries*/ - $43,937.39, Consultants - $79,613.15) directly to the six states whereas $86,348.36 of payroll was allocated to the NE Region. In addition, the Committee allocated $110,810.51 of overhead costs directly to the six states whereas $86,668.67 of overhead was allocated to the NE Region. Categories of overhead costs include Telephone (Intra-state), Rent/Utilities, Supplies and Equipment (see Attachment 1).

The Audit staff noted that of the $43,937.39 in salaries allocated directly to the six states by the Committee, $-0- was allocated directly to New Hampshire. Massachusetts received the largest portion - $37,085.69. Of the $79,613.15 in consultant fees allocated to the six states, only $15,313.55 was allocated directly to New Hampshire by the Committee. Therefore, direct charges to New Hampshire represent only 12% of salaries and consulting fees direct charged to the States within the region.

The Audit staff further noted that of the $110,810.50 allocated to the six states for the overhead categories, only $15,241.11 (or 14%) was allocated directly to New Hampshire by the Committee. Massachusetts again received the largest portion - $56,052.93 (or 51%).

It is the opinion of the Audit staff that based on the Committee's direct allocations of payroll/overhead to the NE Region states, the Committee had independent offices in all these states but did not acknowledge an office for New Hampshire. For example, the Committee made direct allocations to New Hampshire of payroll and overhead in the amount of $30,554.66, compared to Massachusetts - $107,383.62, Maine - $28,574.47 and Vermont - $35,838.79. The primary dates for Massachusetts, Maine and Vermont were 3/8/88, 2/26/88 and 3/1/88 respectively, whereas the New Hampshire primary was held on 2/16/88 and is traditionally the most significant primary in the region.

b. Review of Staff Vendor Files

The Audit staff reviewed all available vendor files and travel reimbursement documentation for Committee staff whose salaries or consulting fees were included in the payroll costs allocated to the NE Region by the Committee. A determination was attempted as to whether these employees appeared to be performing "regional" activities or activities associated with just one of the states.

Of the five staff persons whose salaries were allocated to NE Region, four of them traveled extensively for the Committee. However, these four persons only left New Hampshire

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*/ Includes FICA calculations as determined by auditors.

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occasionally and no trips to the other states were documented after October 24, 1987. The Audit staff noted that many of these trips were to Boston, Massachusetts for staff training and staff meetings. The available documentation did not indicate any training or meetings occurring in New Hampshire. The fifth person apparently did not travel. Because of the nature of the available documentation, the Audit staff was unable to determine the assignments or projects these persons were involved in during their employment with the Committee.

The Regional Director for the New England Region worked out of the Committee's headquarters in Washington, D.C. after 6/1/87. His consulting fees were allocated 100% to Fieldstaff - Consultants (i.e., National Operations). A review of his vendor files revealed that he traveled from D.C. to New Hampshire frequently for short visits and occasionally visited the other NE states. Again, no documentation was available to determine the projects he worked on.

Of the three staff persons whose consulting fees were allocated to the NE Region, one was the Executive Director for the Massachusetts state office. A review of his vendor files did not show him leaving Massachusetts while employed by the Committee. The Committee originally allocated his $18,500 in consulting fees to NE Region but later adjusted it by reclassifying $15,500 of these fees to Massachusetts.

The second consultant, who was a resident of Vermont, was the Executive Director for the Vermont office and the only staff person for the Maine office. He primarily traveled in Vermont and Maine with a few trips to New Hampshire. The Committee originally allocated his $15,500 of consulting fees to NE Region but later reclassified $14,000 of these fees to Vermont.

The third consultant performed computer services from 8/9/87 through 2/27/88. Because she was a Manchester, New Hampshire resident and had no travel reimbursements, the auditors concluded that she worked at the Manchester office. This person received eight checks from the Committee for her services - five were allocated to NE Region - Equipment ($1,522.50, 8/9/87-11/14/87), one was allocated to New Hampshire - Consultants ($457.50, 11/15/87-12/19/87), one was allocated to NE Region - Consultants ($365.00, 12/20/87-1/31/88) and the final one was allocated to New Hampshire - Consultants ($142.50, 2/1/88-2/27/88). The auditors were unable to identify the projects she worked on from the available documentation.

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c. Review of Committee's NE Region Allocations

The auditors performed a review of the available supporting documentation for all the Committee's allocations to the NE Region account codes to evaluate the allocations. Direct allocations by the Audit staff to the six states was undertaken based on our review of the vendor files (see Attachment 2).

Based on our review of the information made available, it is the opinion of the Audit staff that the Committee has not demonstrated that the office in Manchester, New Hampshire functioned as a regional office. Therefore, the Audit staff has determined that the $150,506.55 of costs allocated to the NE Region by the Committee are allocable to New Hampshire. Since the Committee has allocated 60% of this total to New Hampshire through its regional allocations, the additional allocation to New Hampshire is $54,341.62, determined as follows:

Audit Allocations to New Hampshire	$150,506.55	
Additional Portion to New Hampshire	x .40	
		60,202.62
LESS: Audit Allocations of New England Regional Expenses to Other 5 NE Region States	9,768.33	
Overallocated % to New Hampshire	x .60	
		(5,861.00)
Additional New Hampshire Allocation		$54,341.62

d. Committee Comments

At the exit conference the Committee Treasurer stated that control of the offices in the other NE states was from the office in Manchester, New Hampshire and that expenses allocated directly to these states does not preclude the use of percentage allocations in a regional office concept. The former Treasurer stated that the "regional" office in Manchester remained open after the New Hampshire primary (2/16/88) which he believes supports their regional allocations. It appears from the auditors review of the vendor files that the NE Region's salaried employees

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were paid for the last time on 3/2/88 for the period 2/16/88-2/29/88, or one pay period after the New Hampshire primary. No records were available to show the duties of the NE Region office or employees.

At the exit conference, the Committee was provided with copies of work papers in support of the auditors' figures.

In the Committee's response to the interim audit report, the Committee Treasurer explains that "[a]t the beginning of the campaign, DFP knew that a number of New England states would have early electoral tests of one sort or another" and that "[b]ecause of this, it was important that we utilize our resources in the months leading up to the various tests so as to maximize our success."

The Committee Treasurer states that in June of 1987, the Committee reviewed its staffing needs for the six New England states and they determined to set up a regional office in New Hampshire. He further states that "...the decision was, in some part, made with the beneficial affects it would have on the spending limit problem" but that "the decision was primarily made because of the understanding that the region's top people would necessarily spend most of their time in New Hampshire and therefore that state made the most sense to host a regional office."

He continues by stating that "[o]nce a decision was reached to place a regional office in New Hampshire, staff was asked to review the duties of the five New England staff people and make a determination of how much time each was expected to spend on New Hampshire versus the other New England states over the next several months as a whole. For any given week the time actually spent on one state or another might be different but I thought it appropriate to have an allocation formula based on the entire campaign rather than adjust it from one week to the next."

The Committee provided a copy of a memo dated June 23, 1987 in which the Treasurer points out that with the exception of the 70% estimated for the New Hampshire Executive Director, all employees were estimated to spend 40% of their time on New Hampshire (see Attachment 3). The Committee Treasurer states that "[g]iven the extreme doubt with which I knew the auditors would view a regional office, I set the regional allocation to 60% for New Hampshire, 20% for Massachusetts and 5% for the other four states." The Committee also provided a New England Regional Committee newsletter from November 1987 which contains articles regarding the Committee's regional approach to the New England states (see Attachment 4).

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The Committee takes exception to the Audit staff's analysis of the direct costs to the other NE Region states. They state that "[t]he fact that DFP chose to have a regional office does not preclude it from having offices in the states covered by that regional office. That would be like saying that because we had a national office, we shouldn't have offices in the field. Of course we had significant direct costs in the states outside of New Hampshire, we were trying to win everywhere."

The Audit staff contends that based on our analysis of direct costs allocated to the NE Region states that it appeared that the Committee had independent offices in the five states other than New Hampshire. Since the direct costs allocated to New Hampshire were minimal, the "Regional Office" more closely resembled a New Hampshire state office than a regional office.

The Committee points out that the Audit staff notes that $173,017 of payroll/overhead was allocated to the NE Region but that the Audit staff does not acknowledge that 60% of that figure was allocated to New Hampshire via the NE Region allocations. This 60% allocation is acknowledged in several places in the interim audit report. They add that they believe that a state with a regional office would have little in direct costs but would have the lion share of regional costs, which they point out is supported by the auditors' figures.

The Committee also contends that the Audit staff does not mention that the Committee paid $700 in January for another office in Manchester, New Hampshire and over $3,000 for space it took over from the Haig Committee, which was all allocated directly to New Hampshire. They add that as in the other states, the Committee had space dedicated directly to New Hampshire. The Audit staff points out that the Committee paid $1,400 on November 30, 1987 to the same vendor that the $700 was paid to in January 1988. This $1,400, for one month's rent plus a $700 security deposit, was allocated to the NE Region. Also, of the $3,013.66 paid to the Haig Committee in February 1988; $66.66 was for rent, $47 was for utilities and $2,900 was for the purchase of yard signs.

Therefore, office rent allocated by the Committee directly to New Hampshire totalled only $766.66. Contrary to the Committee's assertion, these expenses, which they direct charged to New Hampshire, were taken into account by the Audit staff as illustrated by Attachment 1, which was also attached to the interim audit report. Available documentation does not allow a determination to be made regarding that portion of NE Region rent expense which relates solely to New Hampshire.

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In the Committee's response, the Treasurer states that he was confused by the $150,506.55 figure on page 21 of the Interim Audit Report. This figure was the portion of costs allocated to the NE Region by the Committee which the auditors determined, from a review of the available supporting documentation, was allocable to New Hampshire.

The Committee also takes exception with the Audit staff's statement that the New Hampshire primary is traditionally the most significant primary in the region. The Committee states that they are not claiming that New Hampshire was unimportant and that the 60% allocation reflects this belief.

The Committee further states that if the Audit staff does not believe the allocation formula was reasonable then the Audit staff should provide the Committee with the allocation formula it deems as reasonable. Without documentation in support of the programs, activities and staff assignments involving the six states deemed NE Region states by the Committee, the Audit staff is unable to determine an allocation formula. If these materials had been provided by the Committee to the Audit staff when requested during the fieldwork and again in the Interim Audit Report, the Committee's allocation formula could have been reviewed for reasonableness or an alternative could have been proposed once it had been demonstrated that the Manchester office was actually a regional office.

The Audit staff concludes that, based on available information, the Committee's Manchester, New Hampshire office functioned primarily as the New Hampshire office. As noted above, the New Hampshire primary is traditionally the most significant primary in the region. The Committee acknowledges this in their response to the interim audit report and notes that their 60% allocation of the NE Region to New Hampshire reflects the State's importance. The Audit staff also believes that 60% is conceivably a reasonable allocation of any regional expenses incurred by the Committee. As noted in the interim audit report and discussed above (Page 20), the Committee allocated no salary and relatively small amounts of consulting and overhead directly to New Hampshire (see Attachment 1). For the majority of expenses related to the New Hampshire office, the Committee does not distinguish between expenses which were incurred for their New Hampshire campaign and those which may have been "regional". Rather, the regional expense allocation was applied to the total of these two types of expenses. This point is demonstrated by Attachment 3. In this memorandum, the Committee makes estimates of the portion of certain individuals' time that would be dedicated to New Hampshire versus regional work.*/ However, when the allocations were done,

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*/ No information is available to determine if these estimates proved to be accurate.

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rather than applying the regional allocation formula to the regional portion of these salaries, it was applied to the sum of the New Hampshire and regional portions. No documentation is available to allow the Audit staff to determine the regional versus New Hampshire portions of the expenses associated with the NE Region. Finally, it is noted that when all salaries, overhead and other expenses for the states in the NE Region are taken together, the Audit staff's New Hampshire allocation represents only 46% of the total.

No changes have been made to the interim audit report allocations.

6. Compliance Exemptions - Media Costs

Section 106.2(b)(2)(i)(B) states that expenditures for radio, television and similar types of advertising, including any commission, purchased in a particular media market that covers more than one State shall be allocated to each State in proportion to the estimated audience. It further states that the allocation shall be done using industry market data.

Section 106.2(c)(5)(i) of Title 11 of the Code of Federal Regulations states, in part, that exempt compliance costs are those legal and accounting costs incurred solely to ensure compliance with 26 U.S.C. 9031, 2 U.S.C. 431 and 11 C.F.R. Chapter I, including the costs of preparing matching fund submissions. The costs of preparing matching fund submissions shall be limited to those functions not required for general contribution processing.

Section 441d(a)(1) of Title 2 of the United States Code states that whenever any person makes an expenditure for the purpose of financing communications expressly advocating the election or defeat of a clearly identified candidate, or solicits any contribution through any broadcasting station, newspaper, magazine, outdoor advertising facility, direct mailing, or any other type of general public political advertising, such communication, if paid for and authorized by a candidate, an authorized political committee of a candidate, or its agents, shall clearly state that the communication has been paid for by such authorized political committee.

The Committee applied a 10% compliance exemption to their media costs which according to the Committee treasurer represents the costs incurred for including the disclaimer notice required by 2 U.S.C. §441d(a) on broadcast media. The amounts exempted by the Committee were as follows:

Iowa	$16,061.46
New Hampshire	$13,961.15

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The Audit staff disagrees with the Committee's application of compliance exemptions to their media costs.

The cited regulations on media allocation make no provision for a compliance allocation. Further, the definition of a compliance cost speaks in terms of cost solely to ensure compliance. The section goes on to explain one category of expense where an incremental cost analysis is used to determine which costs will be considered solely to ensure compliance. Though not contemplated by the regulation, if a similar analysis was attempted on media, the incremental cost would appear to be at the production stage rather than for air time. Production costs need not be allocated to any state.

Some exceptions to the "solely to ensure compliance" test have been provided by Commission regulations. These relate to salary and overhead costs for both state and national headquarters operations. Percentages are given for compliance deductions for these categories of expenses. These exceptions are, however, very specific and narrowly drawn and do not cover broadcast media.

At the exit conference, the committee treasurer referred to advisory opinion 1988-6 which allowed the allocation of 50% of media air time costs to fundraising if a request for funds as short as 3 seconds occurred. The Audit staff does not believe that a deduction for compliance is analogous. First, the advisory opinion notes that ads have two purposes, the raising of funds and influencing of voters. The required notice does not add a third reason for running the broadcast, but is required as a condition of accomplishing one or both of the two campaign purposes. Second, to qualify for a fundraising exemption, 11 C.F.R. §100.8(b)(21) requires that expenditures need only be "in connection with the solicitation of contributions" while to qualify as a compliance expense, 11 C.F.R. §100.8(b)(15) requires that expenditures be "solely to ensure compliance."

At the exit conference, the Committee was informed of the Audit staff's position. No documentation supporting the Committee's application of a 10% compliance exemption to broadcast media costs has been provided.

In the Committee's response to the Interim Audit Report, the committee reiterates that they incurred costs to air the required disclaimer. They further state that "[w]hether or not DFP would have incurred such costs in any event is, at best, difficult to determine. DFP believes 10% was reasonable, the auditors did not."

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Since the Committee did not provide any documentation in support of their application of a 10% compliance exemption to broadcast media costs, no adjustment will be made to the auditors' allocations for the compliance exemptions related to media costs.

7. Broadcast Media

Section 106.2(b)(2)(i)(B) of Title 11 of the Code of Federal Regulations requires that expenditures for radio, television and similar types of advertisements purchased in a particular media market that cover more than one State shall be allocated to each State in proportion to the estimated audience. This allocation of expenditures, including any commission charged for the purchase of broadcast media, shall be made using industry market data.

The Committee contracted with Multi Media Services Corporation (MMSC) to provide media placement services and they contracted with Ringe Media, Inc. (RMI) to provide media planning and production.

The Audit staff reviewed all available radio and television station invoices to determine if Committee allocations to Iowa and New Hampshire were reasonable. The reasonableness of the allocations was tested by referring to the Arbitron television market share percentages and the Arbitron Ratings Radio Station Reference Report (1987 edition).

The major difference between the Committee's media allocations and the allocations determined by the Audit staff was due to the auditors' use of the Arbitron Radio book for New Hampshire. At the exit conference, the Treasurer stated that he was unaware of the existence of this book. The Committee had used the television percentages for their radio allocation which for New Hampshire resulted in a much lower allocation figure.

The allocation figures for broadcast media are as follows:

	Audited	Committee	Difference
Iowa	$163,210.60	$160,614.62	$ 2,595.98
New Hampshire	176,907.39	139,611.50	37,295.89

Therefore, the additional allocations are $2,595.98 and $37,295.89 to Iowa and New Hampshire respectively.

The Committee was provided with copies of work papers in support of the auditors' figures.

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The Committee agrees with the Audit staff's additional allocations regarding broadcast media.

8. Media Commissions (Production)

The Committee paid RMI a commission equal to 1.5% of gross air time costs for all placements of commercials produced by RMI. This was in addition to the 4% commission paid to MMSC for commercials placed and a $40,000 monthly fee paid to RMI. No allocations were made by the Committee to Iowa and New Hampshire for the 1.5% commission paid to RMI. At the exit conference the Treasurer stated that the RMI commissions were considered production costs and therefore not allocable to the state limits pursuant to 11 C.F.R. §106.2(c)(2). However, the auditors contend that the amount of these fees was dependent on the usage of the commercials and was therefore directly related to air time.

The following amounts were allocable:

Iowa	$177,642.75 x 1.5% = $2,664.64
New Hampshire	$199,205.42 x 1.5% = $2,988.08

In the Committee's response to the Interim Audit Report, the Committee takes exception to these allocations. They state that "...its contract with its media producer (Ringe Media) called for a flat monthly fee plus an additional payment based on the extent we used the commercials he produced." The Committee adds that they do not understand the relevance of the auditors' contention that the amount of these fees was dependent on the usage of the commercials and was therefore directly related to air time. They continue that a producer would receive more funds as the frequency of airing the commercials increased and that they do not know what "directly related to air time" has to do with the fee being considered a production cost.

Although the Committee feels that the 1.5% commissions paid to Ringe Media, Inc. were media production costs and therefore not allocable pursuant to 11 C.F.R. §106.2(c)(2), the Audit staff contends that the 1.5% of gross billings for air time paid to RMI is a cost of media placement and like other such costs is allocable to Iowa and New Hampshire.

9. Individuals' Travel and Salary

Section 106.2(b)(2)(ii) of Title 11 of the Code of Federal Regulations states that salaries paid to persons working in a particular state for five consecutive days or more, including advance staff, shall be allocated to each State in proportion to the amount of time spent in that State during a payroll period.

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Section 106.2(b)(2)(iii) of Title 11 of the Code of Federal Regulations states that travel and subsistence expenditures for persons working in a State for five consecutive days or more shall be allocated to that State in proportion to the amount of time spent in each State during a payroll period. For purposes of this section "subsistence" includes only expenditures for personal living expenses related to a particular individual traveling on committee business, such as food or lodging.

Section 106.2(c)(5) of Title 11 of the Code of Federal Regulations states that an amount equal to 10% of campaign workers' salaries and overhead expenditures in a particular State may be excluded from allocation to that State as an exempt compliance cost. An additional amount equal to 10% of such salaries and overhead expenditures in a particular State may be excluded from allocation to that State as exempt fundraising expenditures, but this exemption shall not apply within 28 days of the primary election.

The Audit staff reviewed the vendor files related to Committee staff travel in Iowa and New Hampshire to identify travel and salary costs which although allocable were not allocated to these states by the Committee.

This review revealed that expenditures for intra-state travel and subsistence had been incurred by staff persons in Iowa and New Hampshire who were in these states on five or more consecutive days but were not allocated to the states by the Committee. The related payroll costs for these persons was also calculated and included as expenses allocable to these states. The payroll was calculated for the period of time in which these persons were documented as being in these states and was adjusted for the compliance and fundraising exemptions as appropriate.

Based on this review, the Audit staff determined that the following travel and salary cost totals be allocated to Iowa and New Hampshire:

	Iowa	New Hampshire
Travel	$46,584.43	$51,309.52
Salary	60,793.78	15,039.73
TOTAL	$107,378.21	$66,349.25

The Committee was provided schedules of these travel and salary costs at the exit conference.

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In the Committee's response to the Interim Audit Report, they provide arguments on a few of the travel and salary costs allocated to Iowa and New Hampshire by the auditors.

The Audit staff allocated to Iowa the salary of Tom Synhorst (co-Regional Director for Iowa) for paydays from March 13, 1987 through March 1, 1988 (also see Exhibit H). The Committee agrees with the Iowa allocations for the salary payments for paydays January 1, 1988 through February 15, 1988 ($7,059.78). They disagree with the allocation of his 1987 salary payments ($42,867.20) and one salary payment covering the period February 15, 1988 through March 1, 1988 which the Committee notes was after the Iowa caucus ($2,418.98) Salary payments allocated to Iowa by the Audit staff totaled $52,345.96.

The Committee states that for the 1987 salary payments, the auditors need more than a person's position to allocate the costs to Iowa. They add that they do not believe that the auditors have any record of Mr. Synhorst being in Iowa more than four consecutive days and that "[t]his is not because we were being cute and hiding his expenses somehow." The Committee further states that "...in the beginning, Mr. Synhorst was responsible for Kansas, a state DFP placed a great deal of importance in" and that "Mr. Synhorst returned to Washington on a regular and frequent basis." The Committee then states that "Mr. Synhorst may have violated the four day rule at some point of which I am unaware, but I believe the burden is still on the Audit staff to make such a showing."

The Audit staff notes that it included Tom Synhorst's 1987 salary payments as allocable to Iowa because of his position as co-Regional Director for Iowa, because the Committee provided him with an apartment in Des Moines, Iowa from March 1987 through February 1988 and because we were unable to determine from the documentation provided by the Committee the exact dates Mr. Synhorst was in Iowa or when he had returned to his permanent residence in Washington D.C., which he apparently did quite frequently. The auditors did note, from airline reservation documentation*/, at least eight occasions where Mr. Synhorst was in Iowa for five consecutive days or more.

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*/ This information shows only reservations, not actual flights, and only includes travel arranged by the Committee's travel agency.

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As far as the inclusion of the paycheck covering the period February 15 through March 1, 1988, which the Committee disagrees with, the Audit staff notes that we included his salary through the end of February because the Committee paid for the rental of his Des Moines apartment for the month of February. The available documentation for Mr. Synhorst's expenses indicates that he was in Iowa through the date of the Iowa caucus (2/8/88), but that the auditors were unable to determine if he remained in Iowa through the end of February. Based on the Committee's argument, the Audit staff has deleted the $2,418.98 of salary to Tom Synhorst for the February 15 through March 1, 1988 pay period.

The Committee objects to the auditors' allocation of one-fifth of a payment ($597) to Long Lines Limited for airfare which represents Tom Synhorst's share of the payment. He was one of the five Committee officials on the flight. They state that the trip was in April of 1987 and that "[u]nless the auditors have evidence that he had broken the four day rule this charge should be removed." The Audit staff notes that the date of travel was April 14, 1987, that the trip was within Iowa only, and that according to airline reservation documentation for Tom Synhorst, he was in Iowa from April 8 through April 15, 1987. Based on this information, the $597 allocation to Iowa will remain unchanged.

Given that Committee records do not establish Mr. Synhorst's whereabouts, his position with the campaign, and his association with a Committee-provided apartment in Des Moines, no further adjustments of Mr. Synhorst's salary have been made.

Next, the Committee disagrees with $15,377.20 in air charter service charges which the auditors have allocated to Iowa. This figure is comprised of amounts from three payments.

The first amount allocated by the auditors to Iowa was $3,448.00 for two flights on February 7, 1988. the first flight was from Omaha, Nebraska to Ft. Dodge, Iowa and included Senator and Mrs. Dole and six other Committee officials and staff. It should be noted that the Audit staff considered this Iowa intra-state travel because the entourage attended an event in Glenwood, Iowa prior to flying to Ft. Dodge, Iowa via an Omaha, Nebraska airport. The second flight was from Ft. Dodge, Iowa to Des Moines, Iowa with the same eight persons aboard.

In the Committee's response, they point out that Mrs. Dole was in Iowa from February 7 through 9 (less than five days) and therefore her costs were not allocable. The Audit staff concurs with this statement and therefore backs out her share of these two flights, as well as an additional share for the Committee staff person who accompanied her on these trips. The adjusted total for the first amount is therefore $2,586.00 ($3,448.00 - $862.00).

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The second amount allocated by the auditors to Iowa was $6,091.20 for two Iowa intra-state flights for Senator Dole and five other staff members who were in Iowa for at least five days. No change to this amount has been made.

The third amount allocated by the auditors to Iowa was $5,838.00 which, according to the check tissue, was for "air travel E. Dole and staff." The auditors were unable to determine from the Committee's records where this travel occurred, when this travel occurred, and except for Mrs. Dole, who the travelers were.

The Committee provided documentation which demonstrated that this payment was for inter-state travel and therefore not allocable to Iowa. The Audit staff has adjusted the allocable amount to Iowa by $5,838.00.

The Committee further objects to the $5,212.18 in Visa card charges which the auditors have allocated to Iowa. This total is for six charges ($5,128.42) by Senator Dole, for which the transaction dates were 12/29/87 for one item and early February 1988 for the other five items, and one charge by Mrs. Dole ($83.76) with a transaction date of 2/7/88. The 12/29/87 charge by Senator Dole ($72.02) was for a purchase at Radio Shack in Keokuk, Iowa and the other five charges by Senator Dole in early February 1988 were travel-related and were around the February 3 through February 9, 1988 time period he was documented to be in Iowa.

Since Mrs. Dole was documented to be in Iowa from February 6 through February 9, 1988, the Audit staff concurs with the Committee for this item and has deleted the $83.76 from Iowa allocation.

The Committee states that it is confused over the auditors' allocation of charges to New Hampshire related to costs incurred at the Merrimack Hilton.

The Committee made 2 payments to the Merrimack Hilton totaling $9,184.88. The first on August 24, 1987, was a deposit for "election night/week." This $4,000 was allocated to New Hampshire by the Committee. The second payment was $5,184.88 made on January 28, 1988 and represents the balance due on the charges. Of this amount, $802.50 was allocated to New Hampshire by the Committee. The amount billed by the Merrimack Hilton includes charges for Senator Dole and Committee staff between February 9 and February 16, 1988. Among these charges are a suite for one week for the Doles ($1,917.44), one staff room ($1,917.44), two rooms for seven nights ($1,168.44), ten rooms for three nights ($2,503.80), use of the grand ballroom ($802.50), and an unspecified charge of $714.76. The Audit staff allocation of $4,221.88 was determined as follows:

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Total Payments:	$ 9,184.88
Less: Press Filing Room	(160.50)
Committee Allocations	(4,802.50)
Additional Allocation	$ 4,221.88

The charge for the ten rooms for 3 nights is included though the documentation does not indicate who, if anyone, occupied the rooms. This charge is therefore allocable under the general allocation provisions of 11 C.F.R. § 106.2(a)(1). Since no documentation was provided by the Committee to refute the auditors' allocation, the $4,221.88 amount remains unchanged.

10. Non-Travel and Salary

During the review of vendor files the Audit staff noted non-travel and salary costs which were allocable to Iowa and New Hampshire but were not allocated to these states by the Committee. Examples of costs in these categories include meeting expenses, car rentals, telephone, event expenses, and newspaper subscriptions. The Audit staff determined that non-travel and salary costs, which were allocable to Iowa and New Hampshire, totaled $64,008.61 and $34,170.96 respectively.*/

The Audit staff provided schedules of these non-travel and salary costs to the Committee at the exit conference.

Iowa

The Committee objects to the following charges allocated to Iowa by the Audit staff:

(a) Southwestern Bell, $379.95

The Committee states that the equipment was sent to Iowa for the announcement tour but did not remain there since it was used by the advance staff after Iowa. The Audit staff notes that since no information was provided regarding

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*/ These allocable amounts have been reduced due to Polling Expenses having been moved to section 11 below ($16,200.00 in Iowa and $14,697.52 in New Hampshire).

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how long the equipment was used in Iowa, the $379.95 allocated to Iowa remains unchanged. The invoice date for this equipment was November 24, 1987 so it is possible the equipment was in Iowa for at least two months through the date of the Iowa caucus (2/8/88).

(b) R.G. Dickinson & Co., $72.00

The Committee states that this item was charged to an account which was subsequently allocated to Iowa. The Audit staff concurs and has deleted this item.

(c) RST Marketing, $32,189.33

The Committee provided a sample of the fundraising letter from Senator Chuck Grassley (Iowa) which the auditors agree demonstrates that the costs associated with this mailing are exempt fundraising. Of the $32,189.33 allocated by the auditors, $25,880.86 was related to the Grassley mailing and has been deleted. In addition, since the Committee allocated 10% of the cost of this mailing to the Iowa state limitation ($2,875.65), the auditors have allowed a credit in this amount to Iowa.

The Committee did not provide any information regarding the remaining $6,308.47 paid to RST Marketing, so that amount will remain allocated to Iowa.

(d) Postmaster, $7,076.41

This item was included in the documentation provided to the Committee at the exit conference but was not included in the Interim Audit Report figures. The Committee was provided with the revised documentation shortly after the exit conference.

New Hampshire

The Committee also objects to the following charges allocated to New Hampshire by the Audit staff:

(a) Southwestern Bell, $379.95

For the reasons provided earlier under Iowa for this vendor, the $379.95 allocated to New Hampshire has not been adjusted.

(b) Manchester Union Leader, $85.80

The Committee states that this charge was for a subscription for the national office. The Audit staff concurs and has deleted this item.

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(c) State of New Hampshire, $1,000

The Committee states that they thought filing fees were exempt. The Audit staff contends that the $1,000 filing fee is allocable to New Hampshire.

(d) Thomas Rath, $10,855.25

The Committee states that Mr. Rath was a national consultant who lived in New Hampshire but worked for the national committee. They add that his travel expenses will reflect this and that "[j]ust because someone has his checks mailed to his home in New Hampshire does not mean that New Hampshire is all they knew about."

The Audit staff notes that they reviewed invoices related to Mr. Rath's consulting firm, Rath & Young, and allocated costs, such as telephone conferences, which involved Committee staff known to be New Hampshire campaign personnel. Also included are costs related to any intrastate New Hampshire travel. Overall expenses and adjustment credits noted on each invoice were prorated by the auditors based on the percentage of time determined to be New Hampshire related.

The auditors note that costs not related to New Hampshire were not allocated to New Hampshire, as suggested by the Committee. The total costs allocated to New Hampshire was 41% of the total amount billed.

(e) William Landau, $3,000

The Committee states that this charge was for a van wreck in Massachusetts and that even though New Hampshire was written on the supporting documentation, it occurred in Massachussetts. Since the documentation supports this explanation, this charge has been deleted from New Hampshire allocation.

11. Polling Expenses

Section 106.2(b)(2)(vi) of Title 11 of the Code of Federal Regulations states that expenditures incurred for the taking of a public opinion poll covering only one state shall be allocated to that state.

The interim audit report explained that the Committee made payments totaling $621,435.28 to the Wirthlin Group for polling services. It was further explained that the Audit staff reviewed the available documentation related to these

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payments, but that it was not possible to determine if the Committee's allocation of the expenses to spending limitations was correct because the documentation did not detail the coverage of the polls. The only exceptions were three payments related to Iowa and New Hampshire Focus Groups. These payments total $16,200.00 for Iowa and $14,697.52 for New Hampshire, and were included in Finding II.E.10., Non-Travel and Salary Costs, of the interim audit report.

In the interim audit report it was recommended that the Committee provide documentation related to polls conducted by the Wirthlin Group that would establish in which state the polls were conducted. It was also noted that after the documentation was reviewed additional recommendations may be forthcoming.

In response to the interim audit report recommendations the Committee states that "Iowa was the obvious place to assess national media. The voters were more aware than any other state other than New Hampshire. Calling something an Iowa Focus Group does not mean that the expenditure was intended to influence Iowa voters." The Committee's response also states that one payment of $479.52 was for interstate travel and therefore not allocable. No documentation related to any of the polling expenses was included with the Committee's response.

Subsequent to the receipt of the Committee's response to the interim audit report, the Commission issued subpoenas to both the Committee and the Wirthlin Group requiring the production of the necessary records. The records provided indicate that the Committee conducted two public opinion polls in the State of Iowa and three in New Hampshire. The cost of these polls requires allocation to the state spending limitations.

The records produced also showed that the Committee commissioned one Focus Group in Iowa and two Focus Groups in New Hampshire. The pollster's reports were provided for the Iowa Focus Group and one of the two conducted in New Hampshire. These reports make it clear that the commercials being evaluated were produced specifically for use in Iowa or New Hampshire. They also indicate that the participants in the Focus Groups were all residents of the state involved. Finally, it is noted that both Focus Group reports indicate that the participants were also asked to view commercials being aired by one or more of Senator Dole's opponents. Copies of the Focus Group report summary sections are at Attachment 5. At the time of the interim audit report only one of the two New Hampshire Focus Groups had been identified. The cost of both are now included in the allocable amount. It was also learned that the $479.52 payment, which the Committee states is interstate travel, was travel related to one of the New Hampshire Focus Groups, and as such is allocable.

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A final item identified from the review of the polling records is a $4,000.00 per month retainer paid for the months of January through March of 1988. A pro rata portion of this retainer has been allocated to Iowa and New Hampshire.

After reviewing the records provided, the Audit staff concludes that additional polling expenses totaling $152,828.21 ($73,786.39 to Iowa and $79,041.82 to New Hampshire) require allocation. These amounts are determined as follows:

	IOWA	NEW HAMPSHIRE
Public Opinion Polls	$57,486.25	$57,578.50
Focus Groups (including assoc. travel)	16,200.00	22,497.52
Pro rata Portion- Monthly Retainer	1,100.14	1,865.80
Total Allocable Amount	$74,786.39	$81,941.82
Less: Amount Allocated by the Committee	(1,000.00)	(2,900.00)
Additional Allocation	$73,786.39	$79,041.82

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12. Testing-the-Waters Expenses Paid by Campaign America

See Exhibit H.

13. Recap of Iowa and New Hampshire Allocations

Presented below is a recap of allocable costs to Iowa and New Hampshire. Copies of workpapers and supporting documentation for the Audit staff's allocations have been provided to the Committee.

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	Iowa	New Hampshire
Amount Allocated by the Committee	$ 793,230.82	$ 462,462.20
Audit Additions:		
1. Twenty-Five Percent Fundraising Exemption (Travel, Events)	28,450.36	13,997.06
2. Fundraising Exemptions-Direct Mail Costs	51,935.78	43,618.56
3. Credit Card Phone Calls (Intrastate)	23,280.46	1,696.44
4. Phone Banks	-0-	-0-
5. NE Regional Office	-0-	54,341.62
6. Compliance Exemptions-Media Costs	16,061.46	13,961.15
7. Broadcast Media	2,595.98	37,295.89
8. Media Commissions (Production)	2,664.64	2,988.08
9. Travel and Salary Costs	98,170.49	66,349.25
10. Non-Travel and Salary Costs */	35,179.99	31,085.16
11. Polling Expenses	73,786.39	79,041.82
12. Testing-the-Waters Expenses Paid by Campaign America (see Exhibit H)	214,437.56	52,120.39
Total Allocable Amount	$1,339,793.93	$ 858,957.62
Less: Exp. Limitation	(775,217.60)	(461,000.00)
Amount in Excess of the Limitation	$ 564,576.33	$ 397,957.62

*/ A portion of the reduction in the interim audit report allocable amounts is due to Polling Expenses having been moved to item 11. ($16,200.00 for Iowa and $14,697.52 for New Hampshire).

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Recommendation #6

The Audit staff recommends that pursuant to the Commission approved Materiality Thresholds, this matter be referred to the Commission's Office of General Counsel.

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Exhibit E
Attachment 1
Page 1 of 1

Dolc for President SA-2/1

Schedule of Direct Costs (NE Region States) 3/10/87 MFT

	NH	MA	CT	ME	RI	VT		Totals
Payroll:								
Salaries	-0-	34557.83	4373.00	-0-	12000.00	-0-		40730.83
FICA ('87 - 7.15%) ①	+0-	1339.15	-0-	+0-	+0-	+0-		1339.15
FICA ('88 - 7.51%) ①	-0-	1188.53	328.50	-0-	150.00	-0-		1667.03
Total Salaries	-0-	37085.51	4701.50	-0-	2150.00	-0-		43937.01
Consultants	16313.65	14245.00	8568.00	20236.87	6000.00	15249.00		77613.52
Total Payroll	16313.65	51330.51	13270.50	20236.87	8150.00	15249.00	108236.33	123550.53
Payroll (Excluding WH)								
Overhead:								
Telephone (Intra-state)	625.18	2207.98	1572.05	4162.25	2278.55	12650.00		48989.01
Rent	7666.00	15750.00	300.00	600.00	3250.00	3000.00		23666.00
Utilities ②	190.74	3762.46	-0-	207.24	381.60	-0-		4491.04
Supplies	619.50	4601.21	776.50	1043.80	730.00	2681.50		16229.21
Equipment	188.53	9864.48	758.23	2329.19	342.00	2257.92		17933.80
Total O/H	15241.11	56052.21	3407.23	8337.60	7181.15	20589.21	95569.46	110810.51
O/H (Excluding A/H)								
Total Payroll/Overhead	30554.46	107383.42	16677.73	28574.27	15332.15	35838.21		234361.05

① Determined by Auditors
② $2,900 for Yard Sign excluded

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Dole for President Committee
Audited New England Region Allocations

Account Code Name	Allocations as Determined by the Audit Staff					
	NH	MA	VT	ME	CT	RI
1. Political Events (w/o Sen.)		$ 34.00				
2. Tour Events-NE	$ (176.96)					
3. Inter-State Travel	9.85					
4. Salaries (Including FICA)	68,737.44					
5. Consultants	579.40	2,400.00	$1,200.00			
6. Telephone (Non-Inter)	4,791.96					
7. Rent/Utilities	8,635.64					
8. Supplies	11,948.57	928.03	87.20	$81.60	$42.12	$66.56
9. Equipment	45,994.29	3,283.84				
10. Postage/Printing	8,884.56	1,644.98				
11. Newsletter Expense	1,101.80					
TOTAL	$150,506.55	$8,290.85	$1,287.20	$81.60	$42.12	$66.56

$9,768.33

MEMO

6/27/87
To: Bill Lacy cc J.M.
From: A. Walker
RE: Budget/Salaries - N.H

Jim C - N.H Exec Dir and Reg. Office Mgr.
Salary 35,000 annual - 70% N.H. = 24,500 annual
30% Reg = 2,100 annual
charged To each Reg. state (5)
x 10 months = $2,042 per month N.H = 20,420 Tot.
x 11 months = 175 per month ea Reg state

Suzanne N. - Reg. scheduler and Advance Coord.
Salary 22,000 annual - 40% N.H. = 8,800 annual
60% Reg. = 13,200 annual
charged To each Reg. state (5)
x 10 months = $734 per month N.H = 7,333 Tot
x 11 months = 220 per month ea Reg. state

Ken Fredette - Reg Youth Coord.
Salary 15,000 annual - 40% N.H. = 6,000 annual
60% Reg. = 9,000 annual
charged To each Reg. state (5)
x 9 months = $500 per month N.H = $4,500 Tot.
x 10 months = 150 per month ea Reg. state

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Paul Jacobson - Req. Press Sec. and Communications Dir.
Salary 35,000 annual - 40% N.H. = 14,000 annual
60% Reg = 21,000 annual
charged to each Req. State (5)
x 7 months = 1,167 per month N.H = 8,169 Tot
x 8 months = 350 per month ea Req. State

Req. Mgr. - Computer Op. (To be hired)
Salary 20,000 annual - 40% N.H. = 8,000 annual
60% Reg. = 12,000 annual
charged to each Req. State (5)
x 8 months = $667 per month N.H = $5336 Tot
x 9 months = 200 per month ea. Req. State

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DOLE

DOLE FOR PRESIDENT New England Region Newsletter November, 1987

2,500 Cheer Dole Wildly at Manchester Announcement

More than 2,500 screaming supporters greeted Senator Bob Dole, along with Mrs. Dole and Robin Dole, during a rousing announcement rally held November 9th in Manchester, N.H. The rally, dubbed an "almost flawless political event" by the state's largest newspaper, surpassed the expectations of many political observers in New Hampshire.

"I feel it in the air. I feel victory in the air in the state of New Hampshire," Dole told the crowd.

Dole was flanked on one side by hundreds of young people — members of the Youth for Dole organization in New England. On the other side of the stage, a bleacher section held 75 members of the 10th Mountain Division and their wives. Some of the former soldiers were attired in blue blazers and Alpine hats. Others wore white snow uniforms and carried skis and white rifles. Dole was seriously wounded in World War II while serving as a Second Lieutenant with the division in Italy.

During a 20-minute speech, marked several times by applause, Dole:

- *Promised he would go after the federal budget deficit without raising income taxes.*
- *Pledged to continue his concern for the poor, handicapped and disabled.*
- *Called for merit pay for teachers.*
- *Vowed to defend the rights of the unborn.*
- *Promised to fight for a line item veto for the President.*

Sen. Warren B. Rudman, R-N.H., received a loud round of applause when he said, "I don't think there's anyone in America for whom there's better odds that he'll be the 41st President of the United States."



Sen. Dole greeted by thousands as he enters Manchester, N.H. Rally, November 9th.

A Regional Approach to New England

"I felt the ground shake under my feet at my first contact with a New England Town Meeting.: — Thomas Jefferson

Here in New England, we like to think of ourselves as a distinct region of the country, symbolizing the spirit of the nation more absolutely than any other region. After all, at the beginning, New England was America.

Bob Dole knows

continued, inside...

New Campaign Video Ready for Home Viewing

The technology of the 1980's is being applied to the Dole for President campaign in the form of home video parties that will be held across the country in the coming weeks.

The national campaign has produced an affecting 20 minute film describing Senator Dole's life and career. It shows why he can provide the common sense leadership this country will need in the 1990's.

We need you to hold a home video party during the month of November. To get involved, all you need is your TV/VCR, refreshments and some friends who are interested in finding out about Bob Dole. The campaign will provide a complete support package, including the video.

If you are interested in hosting a Bob Dole video party, contact your Dole State Coordinator or the New England Regional Headquarters in Manchester, N.H.

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A Regional Approach to New England, cont. . . .

about New Englanders. We share many values with Midwesterners — upright, fiercely independent, hard-working. That's why the Bob Dole campaign has taken a regional approach to New England.

Our regional headquarters is located at 852 Elm Street in Manchester, N.H. Allan Walker, former Chief of Staff to Sen. Warren B. Rudman, R-N.H., is regional field coordinator for New England. Allan is a native New Englander and has a great deal of political experience in this part of the country.

Each of the six states has an Executive Director. Backing up these Executive Directors is a regional support staff based in Manchester that includes a Press Secretary, Youth Coordinator and Scheduler/Advance Operations Coordinator.

The Senator and Mrs. Dole have not been left out of this regional approach. For obvious reasons, they are spending a lot of time in New Hampshire. But they've also made recent stops in Burlington and Cabot, VT; Portland, Ogonquit and Cape Elizabeth, ME; Windsor Locks, Stamford and New Haven, CT; Warwick, R.I.; Boston, Peabody, Worcester, and Springfield, MA.

Mrs. Dole did her graduate work in Boston and skied New Hampshire's White Mountains during her graduate years. Sen. Dole has many New England supporters who are veterans of his Army unit, the 10th Mountain Division.

Aside from the obvious importance of New Hampshire on February 16, New England contains two "Super Tuesday" states — Massachusetts and Rhode Island. When Vermont holds its primary on March 1, it will stand alone as the only primary election that week — attracting significant national attention.

New Hampshire	**February 16**	**Primary**	**23 delegates**
Maine	**February 28**	**Caucus**	**22 delegates**
Vermont	**March 1**	**Primary**	**17 delegates***
Massachusetts	**March 8**	**Primary**	**52 delegates**
Rhode Island	**March 8**	**Primary**	**21 delegates**
Connecticut	**March 29**	**Primary**	**35 delegates**

*beauty contest



Sen. Dole addresses 2,500 enthusiastic supporters in Manchester.

Talking About Bob Dole

- Senator Bob Dole has been a strong and effective legislator for 27 years. He has led the fights and cast the tough votes in support of the Reagan economic reforms, the Gramm-Rudman deficit reduction legislation, aid to the Nicaraguan Freedom Fighters, and the President's Strategic Defense Initiative.
- The Senator's background, his ability to overcome personal adversity and his experience makes him uniquely qualified to deal with the challenges facing Americans today.
- Senator Dole has a strong record of conservatism in fiscal matters and foreign affairs coupled with a record of compassion for the disabled and those less fortunate.

The Dole for President campaign is organized both in the key early states as well as nationally. Polls are showing support for the campaign's growth everywhere.

A Triple Play . . . Dole . . . Brock . . . Wirthlin

Three big names have recently signed on with the Dole campaign at the national level.

Elizabeth Dole

Elizabeth Dole gave up her position as Secretary of Transportation on September 30th so she could devote herself, full-time to Senator Dole's campaign.

Mrs. Dole kicked off her campaign for her husband with a swing through her native south that began on October 5th.

Speaking to a crowd in Knoxville, Tenn., Dole spoke of her husband's leadership positions in the Senate and his battle to overcome wounds he received in WW II.

"As you can see, I believe in him strongly, and that's why I gave up my full-time position," she told the crowd.

William Brock

The Dole campaign grabbed another one of President Reagan's cabinet members with the enlistment of Labor Secretary William Brock to be National Chairman of the Dole campaign. Brock is a former Senator from Tennessee and Chairman of the Republican National Committee.

Brock is a highly-respected manager. His departure from the Department of Labor promoted *The Washington Post* to dub the move a great gain for the Dole campaign and added, "Mr. Brock has served, not just the administration, but the country well."

Senator Dole, at a news conference announcing the Brock move, said, "Adding Bill Brock to our team is a major political coup. Besides being a close personal friend for many years, he is a political veteran from the south, one of the stars of the Reagan cabinet."

Richard Wirthlin

President Reagan's long-time pollster, Richard Wirthlin, announced in late October that he was joining the Dole team as its pollster.

"Bob Dole is the right man for our times. Americans in 1988 want a take-charge leader who gets results . . . He is the most electable Republican in the strong field of candidates," Wirthlin said.

Wirthlin and his associates have conducted more than 2,000 political studies. He has served as Chief Pollster for Republican presidential candidates in five previous contests.

Leadership Announced in N.H. and Other States

Rudman Endorses Dole

Saying "he has the strength and experience needed to lead this nation into the next decade," Senator Warren B. Rudman, R-N.H., recently endorsed Bob Dole for President.

At news conferences in Manchester, Portsmouth, Lebanon and Keene, N.H., Rudman indicated he believed Dole would be the "thoughtful, thorough, and straight-talking leader this country needs as its next president."

"I'm thrilled to have the active support of someone as well-known and respected as Senator Rudman is in New Hampshire," Dole said. "His visible assistance in New Hampshire and across the country will be a tremendous asset to our campaign," Dole added.

Rudman said he expected to spend most of his free time in the coming months campaigning for Dole.

Several former Rudman staff members have been working for months on the Dole campaign in New England.

More than 250 Republican activists are part of the Bob Dole Advisory, Executive, Finance and Steering Committees in New Hampshire. In addition to Sen. Warren B. Rudman (R-N.H.) as Honorary Chairman, the Dole effort in the Granite State is topped off by N.H. House Speaker, W. Douglas Scamman; former Governor Walter Peterson; Executive Councilor Peter Spaulding; State Treasurer Georgie Thomas; and former Congressman Perkins Bass.

In Connecticut, the Dole campaign is co-chaired by three long-time activists in Connecticut Republican politics. Former State Senate Minority Leader Richard C. Bozzuto; former Vice-Chairman of the State Republican Party, Betsee Osborne; and John Becker, former Republican Town Chairman of Greenwich are leading the Dole effort.

Ten state legislators are on the Dole team in Connecticut, as well as former Congressman Abner W. Sibal.

In Vermont, Senator Robert Stafford and former Governor Richard Snelling are honorary co-chairmen. House Minority Leader Michael Bernhardt, and State Representative Sarah Geer, are working on the Dole team.

In Massachusetts, eleven state representatives, a state senator and two members of the Republican State Committee are key players in a core advisory group. State Senator Peter Weber, Assistant House Minority Leader Kevin Poirier, Rep. Peter Torkildsen, Rep. Iris Holland and State Committeeman Gil Holland, among others, have been working hard for Senator Dole.

In Rhode Island, A 30 member Steering Committee that includes House Minority Whip Arthur M. Read II and former GOP Chairwoman Leila Mahoney is working with victory in mind on March 8th.



Senators Rudman and Dole greet Dole supporters at Manchester rally.



10th Mt.Div. Alumni cheer Dole's official announcement.

Youth on the Move

Whether a football game or a political campaign, nothing matches the enthusiasm of college & HS students. Our NE Youth Coordinator, Ken Fredette, (Manchester, N.H.), has been organizing campuses, large & small, across New England.

Projects have included a blitzing of the Dartmouth/Univ. of NH football game, receiving the attention of *The NY Times*.

Many students supplied their energy & support at Senator Dole's Leadership announcement in Aug.

If you know young people who would enjoy working on the campaign, they can write or call Ken Fredette.

Polls—Dole Closes on Bush...

Between Apr.'86 and Sept.'87, the *Gallup Poll* showed the margin narrowing from 32 to 21 points. *TIME Magazine's* poll showed the gap closing from 49 points in May'86 to 24 points in Aug.'87.

The Wall Street Journal/NBC News poll of Republican primary voters showed a gap of 33 points in Aug. '86. The same poll, a year later, showed a gap of only 1%.

National polls consistently show a 2-way race. A June *Harris Poll* showed Dole with 27% and Bush with 31%. A recent *CBS/New York Times* poll shows Bush at 34%, Dole at 23%, with other candidates at 10% or less.

In Key Early States . . .

In the most recent *Des Moines Register* poll, Dole beats Bush 31% to 29% among likely caucus attendees.

In New Hampshire, a poll done for Sen. Rudman among Republicans who have voted in recent primaries, puts Bush at 37% and Dole at 22% — with no one else in double digits. When those polled were informed of Sen. Rudman's support for Senator Dole, the gap between Bush and Dole in New Hampshire closed to less than 10%.

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Finances — Look Good

The Dole campaign is making great progress in the area of fundraising. Dole raised money at a faster rate than any other candidate, Democrat or Republi-can, during the normally-slow summer quarter. Dole raised almost $4 million from Jul. to Sept. That brings the total amount raised to approximately $8 million. Funds are flowing in at a rate of $1.3 million a month and Senator Dole expects to raise the full $14 million allowed by law.

Beyond this encouraging news are indications that the Bush campaign is spending money faster than Dole. As of early Oct., Bush had spent $2 million more than Dole. Remember that all campaigns taking matching funds are subject to a national spending cap of $27 million. Spending rates are important!

Your Action Agenda

1. Set a goal of enlisting 5 - 10 Dole supporters each week.
2. Give names & addresses to the local HQ or the NE Regional HQ in Manchester (603) 623-6680.
3. Hold a home video party for Dole.
4. Write a check to *Dole for Presdient Committee*, 1828 L St., NW, Wash., DC 20036.

Bob and Elizabeth Dole are counting on your active support.





DOLE FOR PRESIDENT
NEW ENGLAND HEADQUARTERS

852 ELM STREET
MANCHESTER, NH 03101

Paid for by the **DOLE FOR PRESIDENT** Committee

Where to Find Us ...

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Executive Director

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Norman (Skip) Watts,
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Peter A. Michel,
Executive Director

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Phil Rivers,
Executive Director

Maine
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Augusta, ME 04330
(207) 622-3899
Norman (Skip) Watts,
Executive Director

From the Clipping File . . .

Across the World-
"He fits the profile of the president whom many Americans, disillusioned after 11 years of two successive Washington outsiders, now say they want: a competent wide-awake Washingtonian who knows his way about and will get things done." *The Economist, London England*

Across the Country-
"In the 11 critical tests of strengths before the onslaught of primaries on "Super Tuesday," next March 8, Dole is widely viewed as a competitor with the potential to win in six or more of the states holding primaries or caucuses from January 27 through March 5." *The Washington Post*

Across New England-
"Dole would be the Republican Party's strongest candidate. He is a good public speaker, an experienced debater and a master of one-liners."
Wm. V. Shannon The Boston Globe

"It looks as if the race for the Republican presidential nomination has already narrowed to two candidates — at least among Carroll County (N.H.) Republicans . . . Dole drew a large crowd of party activists during a Fourth of July visit to Wolfeboro."
Carroll County Independent (N.H.)

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The Wirthlin Group

Decision making information for intelligent choices

COMMERCIAL EVALUATION

FOR THE DOLE CAMPAIGN

Iowa Caucus Media

Prepared for

Dole for President Committee

January 1988

23040955409

1363 Beverly Road, McLean, Virginia 22101 (703) 556-0001

The following analysis, tables, and charts contain the results of the communications focus groups held in Des Moines, Iowa, on behalf of the Dole for President Committee.

Account Executive	Richard B. Wirthlin
Sr. Project Director:	Mary Ellen Jensen
Moderator:	Leslie Bonner
Special Consultant:	John Moss
Location:	Des Moines, Iowa
Date:	January 11, 1988

Description of Focus Groups:

Number of Groups:	Three
Time of Day:	Group 1 3:30-5:00 Group 2 6:00-8:00 Group 3 8:00-10:00
Group Composition:	35 Total 20 Dole 15 Bush 50/50 Male/Female

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BACKGROUND AND PURPOSE

The Dole for President Committee has produced three new commercials that may be aired in Iowa between now and February 8th, when that state's caucuses take place. Before these commercials are put into the media rotation, research was recommended in order to determine the specific communications of each and to determine how voters react to the messages they receive.

Three focused group interviews were conducted in Des Moines, Iowa, on January 11, 1988, with likely Republican caucus participants who favor either Bob Dole or George Bush.

Five commercials were shown. The three newly produced spots were "Can't Spend," "Quarters," and "Intro - Iowa." In addition, "Difference," a Dole commercial that has already aired in the state, was exposed. And the fifth ad included in the research was "Bush - INF Treaty," an Iowa ad that was videotaped as it was broadcast.

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Cautionary Note

Note that focused group interviews are qualitative in nature. They may not be definitive and should be used for directional guidance. This is due to differences in sample composition, differences in the development of the discussion from one session to another, and the limited sample size.

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SUMMARY OF FINDINGS

Overview

All four of the Dole commercials are successful in that each communicates some basic message of Bob Dole's stand on one or more issues or conveys something about the political characteristics of the candidate. Dole supporters view the Dole commercials somewhat more favorably than do Bush supporters and are more critical of the Bush commercial.

"Can't Spend" and "Difference" are the more successful. "Can't Spend" has a message about Mr. Dole's position on fiscal issues that is clearly conveyed, well understood, and seems new.

"Difference" is a well-liked commercial that is interesting to watch, but it lacks substance. It conveys something about who Mr. Dole is as a presidential candidate, and explains his thinking, but it does not address the issues.

Although "Can't Spend" and "Difference" are quite different from each other in what they communicate, and in this way supplement each other, neither reinforces the other. In effect, there is no campaign unity or synergy between these two executions.

"Intro - Iowa" talks about things that are important to voters but they also do not learn anything and the message has nothing to do with them or their needs. They merely acknowledge the message; they do not seem to internalize it. Part of the problem may be that Mr. Dole comes across as arrogant and making exaggerated claims.

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"Quarters" communicates that the Senator cares, but the context of this message is neither relevant nor stimulating. Mr. Dole's story of his war injury is more confusing than enlightening, and is considered annoying and in poor taste. People find themselves disagreeing with what was said.

"Bush - INF Treaty" deals with a highly relevant subject matter yet it relies on borrowed interest and contains nothing new. Even so, it is well-liked and had visual interest.

Being Presidential

In presenting Mr. Dole as a "presidential" candidate, "Intro - Iowa" and "Difference" are more successful than are "Can't Spend" and "Quarters." There are several reasons for this assessment. Both say Mr. Dole has made or will make "a difference." "Difference" also has a number of presidential trappings, the visuals of Mr. Dole working at his Senate desk, shaking hands with Mr. Reagan, giving a speech, the American flag, and Mrs. Dole. In "Intro - Iowa," the Senator mentions Mr. Gorbachev.

The two ads that make Mr. Dole seem less presidential dwell on the Senator's war injury and resulting handicap which are as likely to evoke viewers' pity and sympathy as to illustrate that he has strength to overcome adversity or that he cares and is concerned about Iowans.

In addition, the executional format and setting of "talking heads" come across as "cheap" and "amateurish," better suited for a "senatorial" campaign. This lack of presidential panache is compounded by the "stiff" appearance of Mr. Dole, particularly since he does not flash his "great smile."

"Difference" also presents a dilemma for some. Mr. Dole says he is "one of us" which in some ways contradicts the image that he

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is presidential. Many are concerned about a person like themselves being president because they believe only a person of exceptional ability and vision is qualified. They do not want someone who is average and parochial. As one person says, "He's an average person who has done above average things." And, they ask, "What's he saying to the rest of the country?" "Doesn't he think we care about world affairs?" This commercial is also criticized for mentioning the war injury because they feel it has little to do with politics or leadership.

Leadership Experience

The leadership issue comes into focus for many when they compare the experience of Mr. Dole and Mr. Bush described in the commercials and in light of Mr. Bush's aggressive, non-wimpy, behavior in the recent debates. The Vice President has White House and other Executive branch experience and the Senator has experience in the Legislature. Mr. Bush has had "lots of jobs" while Mr. Dole has spent his time in one, the Senate. Mr. Bush has more experience in foreign affairs which allows him to talk credibly about his ability to work for world peace, a necessity for presidential leadership. Mr. Dole has expertise in domestic matters and dealing with Congress, much like LBJ. These qualities make it credible for him to talk about helping out the average American.

Bush's Liabilities

Mr. Bush's involvement in the Iran-Contra affair is still a concern. People are not searching for evidence, however, as are the media. The Vice President's ties and loyalties to President Reagan are seldom mentioned in any context, except as he aligns himself to the INF Treaty in the commercial shown to respondents and then in a rather neutral way.

Media Portrayal of Mr. Dole

The kinds of characteristics people would like to see Bob Dole demonstrate are sincerity, honesty, and trustworthiness (eye contact and firm voice); a warmth and caring (big smile and perhaps subtle references to upbringing); and 'presidential' leadership in both domestic and foreign affairs as well as in attitude.

Supporters are also eager for the Senator to make distinctions and linkages between past accomplishments and future goals in order to enhance his leadership qualifications and capabilities.

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METHOD AND SAMPLE

Three focused group interviews, lasting two hours each, were conducted on Monday, January 11, 1988, at a research facility in West Des Moines, Iowa. Lesley Bahner of POPULUS, Inc. moderated the discussions.

Respondents met several qualifications in order to be invited to participate in the group discussions: registered voters who plan on attending their neighborhood caucuses and participating in the Republican presidential nomination this year; half favor Bob Dole and half favor George Bush; half men and half women between the ages of 25 and 60.

Five commercials were exposed to respondents, four of which were Dole ads and one for Bush:

"Can't Spend"
"Quarters"
"Intro - Iowa"
"Difference"
"Bush - INF Treaty"

The order of exposure was changed from group to group to avoid position bias.

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Each discussion followed the outline below:

- Introduction and warm-up;

- Each commercial is shown once and respondents fill out a questionnaire that elicits communications and reactions (open-ended responses) and responses to the Voter Response Profile (scalar items);

- General discussion of commercials exploring validity of content and emotional response;

- Re-exposure of commercials followed by discussion of each.

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Appendix B

Commercial Scripts

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"Can't Spend"

Video	AUDIO	
Dole in front of plain blue background	[DOLE]	I'm Bob Dole. I grew up during the Depression in the small town of Russell, Kansas, where I learned that you can't spend what you don't have.
Gradual close-up		As President I'll work for a constitutional amendment requiring a balanced budget, a line-item veto to halt needless spending, and an across the board spending freeze to reduce the staggering federal deficit.
		The people of Russell taught me that you make tough choices today for a brighter future tomorrow.
		I'm Bob Dole, and that's why I'm running for President.

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"Quarters"

Video	AUDIO
Dole in front of plain blue background	[DOLE] During World War Two, I was in the wrong place at the right time and spent over three years in Army hospitals.
Gradual close-up	Friends from my home town passed around a cigar box, dropped in quarters they couldn't afford, and raised money for my operations.
	Since then I've tried to help others and make a difference.
	As the Senate Republican leader I've made a difference, by fighting to cut wasteful spending, and leading the effort to save Social Security.
	I can make a big difference as President, but I need your support.

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"Intro - Iowa"

Video	AUDIO	
Dole in front of plain blue background	[DOLE]	I'm Bob Dole. I made a difference in leading the efforts to rescue social security, cut needless government spending, and save the family farm.
Gradual close-up		I can sit across the table from Gorbachev, or the Congress, and make a difference for America.
		I have the ability and the strength to do what must be done to balance the budget, assure world peace, and lead America to greatness.
		I'm Bob Dole, and that's why I'm running for President.

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"What's the Difference"

Video	AUDIO
"What's the Difference?" (white on black)	[ANNCR] What's the difference between the Republican candidates for President?
Black and white photos: Depression children, Dole during WW2	Only one grew up in Depression-era Kansas and spent three years recovering from combat wounds in World War Two.
Color photo of Dole shaking hands with Reagan / live shot presiding at meeting / giving speech in front of wheat field / family of farmers	Only one has been the Republican leader in the Senate and led the fight to save Social Security, cut excessive government spending, and save the family farm.
Dole working at his desk	Only one - one of us. Bob Dole.
Giving outdoor speech / Elizabeth Dole watching	Bob Dole will make the difference Iowa and America need.
Dole at podium / Dole in front of American flag with "DOLE FOR PRESIDENT" overlay	Dole for President. One of us.

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"Bush - INF Treaty"

Video	AUDIO	
Still photo of George Bush with "and the INF Treaty.../that's George Bush" rolls up screen	[ANNCR]	...INF Treaty, that's George Bush, and here's why.
George Bush speaking	[BUSH]	Well it's a major reduction of nuclear weapons, the first time in the nuclear age that we're eliminating an entire generation of nuclear weapons. And the agreement is verifiable.
Swearing in / shaking hands with constituents / photo of meeting with Iowa's Governor		Over the years I've gotten to know Iowans pretty well. And I am convinced that the people of Iowa cares [sic] deeply about peace as I do.

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The Wirthlin Group

Decision making information
for intelligent choices

COMMERCIAL EVALUATION
FOR THE DOLE CAMPAIGN
NEW HAMPSHIRE PRIMARY MEDIA

The Wirthlin Group

February 1988

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1363 Beverly Road, McLean, Virginia 22101 (703) 556-0001

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BACKGROUND AND PURPOSE

The Dole for President Committee has produced three new commercials to be aired in New Hampshire between now and February 16th, when that state's primary election takes place. As these commercials are put into the media rotation, research was recommended in order to determine the specific communications of each and to determine how voters react to the messages they receive. There was also interest in exposing to respondents a Bush commercial and a Kemp commercial that were receiving air time in the state.

Three focused group interviews were conducted in Manchester, New Hampshire, on February 2, 1988, with likely Republican primary voters who favor either Bob Dole or George Bush.

Five commercials were shown. The three newly produced spots were "Deficit," "Reagan," and "Doonesbury." The Bush commercial that was exposed is called "Bush - Line-item Veto." And the fifth ad included in the research was "Kemp - Social Security." Both of these ads were videotaped as they were broadcast the night before the interviews.

Cautionary Note

Note that focused group interviews are qualitative in nature. They may not be definitive and should be used for directional guidance. This is due to differences in sample composition, differences in the development of the discussion from one session to another, and the limited sample size.

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SUMMARY OF FINDINGS

Overview

Two weeks before the New Hampshire primary election, there is a lot of indecision among Republican voters about which candidate to vote for: They keep changing their minds and the degree of their commitment is moderate to weak. These voters are looking for differentiation and clarification on the issues.

With this confusion about the candidates' views on the issues, it is not surprising that when asked to say something nice about Mr. Dole and Mr. Bush, respondents focus on personality and "experience." Moreover, they say practically the same "good" things about both politicians. Each man is described as an "intelligent," "experienced," "good person" who is "personable" and a "good speaker."

Additionally, Bob Dole has the well-regarded Liddy.

All three of the Dole commercials are successful in that each communicates some basic message of Bob Dole's stand on one or more issues, but not without creating misleading perceptions, disagreements, or negative reactions. "Deficit" is rated the most relevant and credible of the three but the Senator's deficit plan stirs up controversy. "Reagan" and "Doonesbury" are more successful at conveying leadership qualities but raise serious objections among respondents. "Reagan" is seen as highly misrepresentative and is not considered very relevant to voters. "Doonesbury" lacks credibility and empathy because of Mr. Dole's attack on Mr. Bush. Attack format commercials rarely score well on the VRP ratings and are usually criticized in

discussion, but can still be effective as a strategic way of communicating differentiation among candidates, especially in terms of issues.

The commercials also communicate personality differences. The Senator is seen throughout as forceful, determined, decisive. This is in direct contrast to how people regard Mr. Bush in his commercial: friendly and approachable. Most people seem to know that each candidate has both sides to his personality.

"Deficit"

Mr. Dole's proposal for fighting the deficit in the "Deficit" commercial creates the most controversy of the three Dole ads. Some think his stand is viable while others do not think it will work. The detractors call for a spending cut, not just a freeze. Moreover, they think a freeze will not address any of the other economic problems we may face (inflation, taxes, employment). Yet, some say this is a start in the right direction. Almost everyone wants more information about the Senator's plan; they want to know how it is going to work. The Senator gains points for taking a stand on an important issue. This does not, however, translate into "leadership." Indeed, a few observe that if Mr. Dole feels so strongly about his plan, he should have done something before this as a Senate leader.

"Reagan"

"Reagan" is considered by many, especially Bush supporters, to deliver a very misleading and deceptive message. It creates the impression that President Reagan is endorsing Mr. Dole for President rather than merely thanking him for his role in the Senate. Some assume the endorsement is legitimate since they think Mr. Reagan must have approved it. In any case, Mr. Dole is perceived as a person with leadership experience, a leader.

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"Doonesbury"

"Doonesbury" is the least liked commercial because respondents feel that it treats Mr. Bush unfairly in its message and that it violates the 11th Commandment. The Senator may have indeed done those things in his role as legislator, but Mr. Bush cannot be expected to have been involved because he is in the Executive branch. It "wasn't his job." No one likes one candidate attacking another member of his own party in a primary election. Respondents are likely to think that this tactic hurts Mr. Dole for "bad mouthing" and helps Mr. Bush by creating "sympathy." This commercial communicates leadership and many can cite at least one of the areas of legislation he supported mentioned in the ad as an example. Most say they recall the slogan "the difference is leadership" and it may strengthen perceptions of the Senator's leadership abilities; but most regard it as merely a slogan, one that could also apply to Mr. Bush. The visual of the fading picture of the Vice President is highly effective in supporting the commercial message.

"Bush - Line-item Veto"

In the Bush commercial, the Vice President clearly conveys his support of the line-item veto as a way to control the spending excesses of Congress. He makes a strong appeal with his "dig" of "I will if Congress won't." He also shows that he is "ready, willing, and able" to be President having been Vice President for eight years. Yet, the two messages are often perceived as unrelated. Respondents generally like the conversational presentation of talking directly and personally to the viewer. Some like, and some don't like, Mr. Bush's comment about Congress since he seems to alienate Congress even before he is elected. Virtually no one thinks the comment is an attack on Mr. Dole. The commercial is liked by most, whether or not they support Mr. Bush or favor the line-item veto. They also like that it talks about an issue; most agree however, it is not a very important issue.

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"Kemp - Social Security"

Mr. Kemp, in his commercial, comes across as having "saved" Social Security and creates the perception that the Senator and Vice President were working against it. This posture lacks credibility and is farfetched for most: Most do not believe his opponents voted against Social Security and they do not believe the Congressman is the "hero" for saving it. They do allow, however, that he may have influenced the President. Like "Doonesbury," this ad is on the attack. But, unlike that commercial where Mr. Dole is a doer, Kemp comes across as a self-defined "Superman." Most think the commercial does not evoke empathy, is ridiculous, and is not very accurate. The execution is also regarded as amateurish.

Bush's Liabilities

When asked to name the accomplishments or achievements of Mr. Bush in any of his various governmental jobs, no one readily comes up with a specific. Indeed, most agree that the best that can be said is that he has "stayed out of trouble," and "can get along with a lot of different people." This suggests "mediocrity" to some, which is either comforting or disheartening to them. As respondents describe Mr. Bush as an ideal man for working behind the scenes, they begin to ask themselves exactly what it is they want in a President.

Mr. Bush's involvement in the Iran-contra affair remains a concern for some. These respondents wish he would speak up so it can be laid to rest. Others would like to forget the whole thing now, and wish the media would stop asking the questions. Only a few express concern about the "illegal" activities in which the Vice President may have been involved; these people feel strongly that this issue must be dealt with.

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Appendix A

Method and Sample

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METHOD AND SAMPLE

Three focused group interviews, lasting two hours each, were conducted on Wednesday, February 2, 1988, at a research facility in Manchester, New Hampshire. Lesley Bahner of POPULUS, Inc. moderated the discussions.

Respondents met several qualifications in order to be invited to participate in the group discussions: registered voters who plan on voting in their state's primary election this year; 14 favored Bob Dole and 18 favored George Bush; 19 were men and 13 were women. All were between the ages of 25 and 60.

Four or five commercials, from a pool of six, were exposed to each group of respondents in the following order:

Group 1	Group 2	Group 3
"Bush - LIV"	"Deficit"	"Doonesbury"
"Doonesbury"	"Bush - LIV"	"Bush - LIV"
"Kemp - Soc. Sec."	"Reagan"	"Deficit"
"Deficit"	"Doonesbury"	"Quiz"
"Reagan"	"Kemp - Soc. Sec."	(not reported)

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Each discussion followed the outline below:

- Introduction and warm-up;

- Each commercial is shown once and respondents fill out a questionnaire that elicits communications and reactions (open-ended responses) and responses to the Voter Response Profile (scalar items);

- General discussion of commercials exploring validity of content and emotional response;

- Re-exposure of commercials followed by discussion of each.

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Appendix B

Commercial Scripts

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"Deficit"

Video	AUDIO	
Dole in front of auditorium making speech	[DOLE]	How are we going to deal with the deficit?
Shot of crowd		Nobody's told you. No other candidate will stand up and say "I'm going to do this."
Back to Dole making speech		What we ought to do is have a spending freeze.
Shot of newspaper article entitled "Dole Calls for 1 Year Spending Freeze"		What it really means is that say in 1989 we don't spend any more money in than we spent in 1988.
Dole giving speech Shots of crowd		Then you're going to keep interest rates down, then your going to keep inflation rates down. Then you're going to find more jobs for more people of all ages.
Dole speaking		Deficit's going to be public enemy number one.
Dole at podium / Dole in front of American flag / Super: "Dole for President"	[ANNCR]	Dole for President.

9304095438

"Reagan"

Video	AUDIO	
Reagan making speech	[RR]	I want to express my deep appreciation to Senator Dole for the indispensable role he's played in all of this.
RR walking with Senators / at his office door / giving speech		His leadership in the Senate, his strong hand and his responsible voice have made a difference.
Dole talking with men around a table		He's forged a tough, working alliance between the Senate and Executive branch.
Picture of Dole and Reagan		Bob from the heart, I thank you.
Shot of Dole working at desk / Super: "Dole for President"	[ANNCR]	Bob Dole will make the difference America and New Hampshire needs. Bob Dole for President.

2304095543

"Doonesbury"

Video	AUDIO	
Split screen with Dole on one side, Bush on other	[ANNCR]	What's the difference? Bob Dole led the fight to save Social Security. George Bush had nothing to do with it.
Bush slowly fades out		Bob Dole pushed President Reagan's tax cuts through the Senate. George Bush had nothing to do with it. Bob Dole is leading the fight to ratify President Reagan's INF Treaty while making sure the Russians don't cheat. George Bush had nothing to do with it.
Dole with Reagan		Bob Dole will make a difference for America. The difference is leadership.
Picture of Dole / Super: "The difference is leadership"		Bob Dole for President.

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"Bush - Line-item Veto"

Video	AUDIO
Bush sitting on desk with pile of papers	[BUSH] This is the federal budget Congress gives to us. They decide how much money to spend. And, now you'd think the President could make some cuts like any executive, but he can't -- he either has to buy it all or say no to everything. If the President could go through this budget and have a line-item veto, the Federal deficit could be cut in a hurry. Congress doesn't like the line-item veto. That ought to tell you it's a good idea.
Super: "George Bush, ready on day one, to be a great president"	[ANNCR] George Bush, ready on day one, to be a great president.

2304095541

"Kemp - Social Security"

Video	AUDIO
Super: "May 10, 1985"	[ANNCR] May 10, 1985.
Shot of Dole making speech / Capitol Hill	Senator Bob Dole proposes that Congress cut future Social Security benefits; but the Senate deadlocks.
Shot of limousine Bush voting	Vice President George Bush travels to Capitol Hill and casts the deciding vote to cut Social Security.
Shot of Kemp Kemp at meeting with Reagan and others	Determined to block this cut, Jack Kemp rushes to the White House and persuades President Reagan to stop this plan to cut Social Security.
Kemp with senior citizens	Social Security is preserved.
Super: "Jack Kemp. If he wins, we all win"	[ANNCR] Jack Kemp. If he wins, we all win.

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Exhibit F has been incorporated into Exhibit E.11

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Dole for President Delegate Committees Audit Findings and Recommendations

The Audit staff identified eighteen delegate committees apparently formed to support Senator Dole's campaign. Fifteen of these committees were located in Illinois and three in Maryland. Senator Dole authorized thirteen of these delegate committees on amendments to his Statement of Candidacy. Four of the five non-authorized delegate committees filed Statements of Organization with the Federal Election Commission and listed the Committee as an affiliate.

Failure to Maintain Records

Sections 432(c)(1), (2), (3), (5) and (d) of Title 2 of the United States Code state that the treasurer of a political committee shall keep an account of all contributions received by or on behalf of such political committee; the name and address of any person who makes any contribution in excess of $50, together with the date and amount of such contribution by any person; the identification of any person who makes a contribution or contributions aggregating more than $200 during a calendar year, together with the date and amount of any such contribution; and the name and address of every person to whom any disbursement is made, the date, amount, and purpose of the disbursement, and the name of the candidate and the office sought by the candidate, if any, for whom the disbursement was made, including a receipt, invoice, or cancelled check for each disbursement in excess of $200. The treasurer shall preserve all records required to be kept by this section and copies of all reports required to be filed by this subchapter for 3 years after the report is filed.

Section 110.14(j)(1) of Title 11 of the Code of Federal Regulations states that for purposes of the contribution limits of 11 C.F.R. §§110.1 and 110.2, a delegate committee shall be considered to be affiliated with a Presidential candidate's authorized committee if both such committees are established, financed, maintained or controlled by the same person, such as the Presidential candidate, or the same group of persons.

Section 104.14(b)(1) of Title 11 of the Code of Federal Regulations requires political committees to maintain records, including bank records, with respect to the matters required to be reported, which shall provide in sufficient detail the necessary information and data from which the filed reports and statements may be verified, explained, clarified, and checked for accuracy and completeness.

The Audit staff reviewed all available records related to the eighteen delegate committees. Since these records were incomplete, the auditors prepared worksheets to determine the additional documentation necessary to complete our review (see Attachment 1). A copy of these worksheets was provided to the Committee in October 1988 and again at the exit conference.

At the exit conference the Committee Treasurer stated that he was still attempting to obtain the missing documentation from the delegate committees.

In the Interim Audit Report, the Audit staff recommended that the Committee provide the missing records for the eighteen delegate committees.

In the Committee's response to the Interim Audit Report, the Treasurer states the following:

> The problem is that the Illinois committees came at the end of our candidacy. The individuals "running" the committees went their various ways and with them went their records. I realize that this is not an excuse but I want to make it clear to the Commission that these committees were not used in anyway to skirt limits but rather were used for their stated purpose of attempting to win delegates from various congressional districts. The expenditures made by these committees were legitimate campaign expenditures. However, I realize that they do not become "qualified" campaign expenditures until there is some record. I ask the Commission to show leniency with regard to these committees and accept as much as possible of the expenses for which any kind of record exists.

The Committee's response includes the same incomplete delegate committee records provided to the Audit staff during the fieldwork. However, the auditors obtained most of the necessary records as a result of requests sent to the delegate committees or subpoenas sent to the banks where the delegate committees had maintained their accounts.

These requests were sent to the thirteen delegate committees authorized by Senator Dole and one delegate committee not authorized but which noted on a bank confirmation statement that the Committee Treasurer was an authorized signatory on the bank account. Subpoenas were sent to the banks where these fourteen delegate committees had maintained their accounts.*/

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*/ Requests for records were not sent to the four non-authorized delegate committees.

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Based on the Audit staff's review of the subpoenaed records, we conclude that the records provided by the fourteen delegate committees, and their banks, materially cover the records previously noted as missing. However, the Audit staff notes that these records were not maintained by the Committee or by the fourteen delegate committees as required by 2 U.S.C. §432(c) and (d).

Recommendation #8

The Audit staff recommends that this matter be referred to the Office of General Counsel.

Failure to File Disclosure Reports

Section 434(a)(1) of Title 2 of the United States Code requires each treasurer of a political committee to file reports of receipts and disbursements in accordance with the provisions of this subsection.

Under 11 C.F.R. §104.3(f), each principal campaign committee is required to consolidate in each report the reports submitted to it by any authorized committees.

Section 110.14(b)(2) of Title 11 of the Code of Federal Regulations states, in part, that a delegate committee that qualifies as a political committee under the Act must register with the Commission and report its receipts and disbursements in accordance with 11 C.F.R. Part 104.

The Audit staff reviewed all the disclosure reports filed by the delegate committees. Not all disclosure reports were filed as required. As discussed above, Senator Dole authorized thirteen of these delegate committees, and four of the other five committees listed the Committee as an affiliate.

The Audit staff prepared worksheets to indicate which delegate committee disclosure reports were missing (see Attachment 1). A copy of these worksheets was provided to the Committee in October 1988 and at the exit conference.

In the Interim Audit Report, the Audit staff recommended that the Committee file the missing disclosure reports of the delegate committees.

The Committee states in its response that they are ready and willing to file the missing disclosure reports and that "[a]ny help from the Commission in finding the necessary information to fill out a report would be, as always, greatly appreciated."

The Audit staff notes that none of the missing delegate committee disclosure reports were filed by the Committee or by the

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fourteen delegate committees but that the Committee was not in a position to do so because they had incomplete delegate committee records (see Failure to Maintain Records discussion above).

Based on the Audit staff's review of the records obtained by the Commission, we determined that the total activity not reported by the Committee was $27,531.83 in receipts and $42,660.10 in disbursements.

Recommendation #9

The Audit staff recommends that this matter be referred to the Commission's Office of General Counsel.

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DULE FOR PRESIDENT

Exhibit G
Attachment 1
Page 1 of 11

Review of Delegate Comtes

MDT
7/30/88
Pg 1 of 2

Name / Location	Bank / Account No.	Bank Statements	Receipt Records	Disb Records	FEC Reporting Beg Bal	FEC Reporting Receipts	FEC Reporting Disbs	FEC Reporting End Bal	Bank Statements Beg. Bal	Bank Statements Receipts	Bank Statements Disbs	Bank Statements End Bal
MD Delegate Comtes												
1. 1st Dist. Delegates for Dole Bel Air, MD	John Hanson Savings Bank	X	✓	X	2/28 ✓ -0-	2050[22]	1548[28]	502[23]				
2. Beall Campbell Price Comte Stevenson, MD	Maryland Nat'l Bank	X	X	X	2/28 ✓ -0- 3/88 ✓ 4/88 ✓ 1305[21]	1580[22] -0- -0-	-0- 262[30] 1305[21]	-0-				
3. Dole Delegate Team Bethesda, MD	Meritor FSB #A29-00068	X	X	X	1/88 -0- 2/88 1	1600[22] 3960[22]	-0- 5159[21]	400[21]				
IL Delegate Comtes												
4. 3rd District Delegates South Holland, IL Registered - 4/22/88	South Holland Bank #623-177-0	X	X	X	missing				3/88 600[22]	1100[22]	1617[23]	82[23]
5. 4th C.D. Delegate Comte Flossmoor, IL	Interstate of Oak Forest #1788881PO	X	X	X	2/28 ✓ -0- 2/88 ✓ 3/88 ✓	(3K 613[21]) 2000[22] -0-	(3K 613[21]) -0- 1668[22]	(N) 3372[22] (N)	2/28 -0- 3/88 5/15/88	500[22] 1500	-0- 1508[23]	491[23]
6. 6th C.D. Delegate Comte Elmhurst, IL	Illinois Regional Bank #413-516-0	X	X	X	2/88 -0- 3/88 ✓	3220[22] 8005[22]	1649[28] 9586[22]	4087[30] (N)				
7. 8th C.D. Delegate Comte Chicago, IL	Park Nat'l Bank	X	X	X	3/88 -0- 4/88 ✓	2415[22]	2441[28]	3[28] (N)				

(N) - Not Filed X - Incomplete

DOLE FOR PRESIDENT

MUR F
10/3/89
P 2 of 3

Endorsed on Back		Name / Location	Bank / Account No.	Bank Stmts	Receipt Records	Disb Records	FEC Reporting Beg Bal	FEC Reporting Recs	FEC Reporting Disbs	FEC Reporting End Bal	Bank Statements Beg Bal	Bank Statements Recs	Bank Statements Disbs	Bank Statements End Bal
X	8.	9th C.D. Delegate Slate Chicago, IL Registered - 4/22/88	Harris Trust & Savings Bank	X	X	X	(3/88) ✓ -0- (4/88) ✓	7500 [22] (1) 2065 [23]	5565 [23] 4000 [23]	-0-				
							(1) Includes $4,000 Loaned from Local Comte. Excess by $3,000. Ref $4,000 to 4/14/88							
✓	9.	10th C.D. Delegate Comte Deerfield, IL	Deerfield State Bank #2005300400	X	X	X	(3/88) ✓ -0- (4/88) ✓ (5/88) missing	1410 [22] 1925 [22]	-0- 3281 [23]	73 [23] (2)	(2/88) missing (3/88) 1610 [22]	2035 [22] 2388 [23]	2011 [23] 3263 [23]	759 [23]
✓	10.	12th C.D. Delegate Comte Antioch, IL	State Bank of Antioch #159-344	X	X	X	(2/88) ✓ -0-	2370 [22]	370 [22]	2000 [23]	(3/88) 2097 [23]	778 [22]	2481 [23]	414 [23]
✓	11.	13th C.D. Delegate Comte Glen Ellyn, IL	DuPage Bank & Trust Co #110-309-5	X	X	X	(2/88) ✓ -0- (3/88)	1825 [22] 1792 [23]	-0- 2392	1225 [23] (2)	(2/88) -0-	875 [22] 3092 [23]	-0- 2871 [23]	1095 [23]
✓	12.	14th C.D. Delegate Comte W. Chicago, IL	DuPage Nat'l Bank #32-809-0	X	X	X	(3/88) 5000 [22] (4/88) ✓	-0- -0-	3232 [23] 1768 [23]	1768 [23] -0-	(4/88) missing (5/88) missing (6/88) 4870 [22]	-0-	2974 [23]	1916 [23]
✓	13.	15th C.D. Delegate Comte Pontiac, IL	Pontiac Nat'l Bank #12-8871-9	X	X	X	(1/88) ✓ (2/88) -0- (3/88) missing	0560 [23]	872 [23]	1688 [23]	(2/88) -0-	550 [22] 1565 [23] 1231 [23]	2455 847 [23] 2196 [23]	277 [23]
✓	14.	17th C.D. Delegate Comte Geneseo, IL	Central Trust & Savings #29-102-1	X	X	X	(2/88) -0- (3/88) missing	-0-	-0-	-0-	(3/88) -0-	3273 [23]	1937 [23]	1336 [23]

(2) 1/2 F.E.C.

DOLE FOR PRESIDENT

MDF
10/31/88
p. 3 of 3

		Name / Location	Bank/ Account No.	Bank Stmts	Receipt Records	Disb. Records	FEC Reporting Beg. Bal.	FEC Reporting Recs	FEC Reporting Disbs	FEC Reporting End Bal	Bank Beg Bal	Bank Recs	Bank Disbs	Bank Statements End Bal
X Not on list	15	18th C.D. Delegate Comte Chicago, IL (*Not authorized)	Bank of Marca	X	X	X								
✓	16	19th C.D. Delegate Comte Urbana, IL	Busey 1st Nat'l Bank #0051-13-5	X	X	✓	-0-	1820.25	1137.85	682.40	(2/87) -0- (4/88) (6/88) (9/88) (11/88) (3/89) (4/89)	25.00 100.00 1984.25 2486.25 305.25 -0-	19.25 19.25 419.85 1405.85 275.00 18.35	17025
✓	17	20th C.D. Delegate Comte Springfield, IL	Marine Bank of Springfield #4296277	X	X	X	(1/88) -0- (1/88) (3/88)	800.00 200.00 2350.00	704.25 5.00 2511.25	(N)	2/88 -0- 3/88	1000.00 -0- 2350.00	704.25 5.00 2516.25	
							(3/88) (4/88) (5/88)	4528.33 21.00 100.00	4605.33 48.25 105.11	32.25 5.11 -0-	4/88	2695.00	2771.11	27.36
✓	18	Vote Dole Delegates Caseyville, IL	United Ill. Bank of Gillespie #42-0064-2	X	X	X	(11/87) -0- (1/88) (3/88)	1290.00 -0+ 624.35	632.63 96.25 1024.85	209.75				
		(18)												

(N) Not Filed

Audit Division (1/87)

DOLE FOR PRESIDENT

(ASSIGNMENT) Results of Delegate Comtes Review

(SUBJECT)

PREPARED BY: MLF | DATE: 10/7/88

LEAD AUDITOR APPROVAL:

PAGE 1 OF 8

MD Delegate Comtes

1. 1st Dist. Delegates for Dole — Bel Air, MD
   (a) Records needed:
   - Bank Statements (2/88 and beyond)
   - Disbursemend Records for $1,548.48 - 2/88 and $501.52 beyond 2/88. (See W/P). (11 C.F.R. 9033.11)
   - Contributions records - If any rec'd after 2/88 FEC rep. ($2,050) (2 U.S.C. 432(c))
   - Signed Bank Confirmation as of 4/30/88

   (b) FEC reports to file:
   - Post 2/88

2. Beall, Campbell, Price Comte — Stevenson, MD
   (a) Records needed:
   - Bank Statements (2/88 and beyond)
   - Disbursements Records for $1,567.81 - 3/88 - 4/88 per FEC reports (See W/P)
   - Contribution records ($1,580 rec'd in 2/88 per FEC rep).
   - Signed Bank Confirmation as of 4/30/88

   (b) FEC reports ok

3. Dole Delegate Team — Bethesda, MD
   (a) Records needed:
   - Bank Statements (1/88 and beyond)
   - Disbursement Records for $5,542.77 (See W/P) and any beyond 3/88.

Addenda:

23040955451

Exhibit G
Attachment 1
Page 4 of 11

DOLE FOR PRESIDENT

(ASSIGNMENT) Results of Delegate
(SUBJECT) Comtes' Review

PREPARED BY: MLF | DATE: 12/7/88
LEAD AUDITOR APPROVAL:

Dole Delegate Team (cont'd):
- Contribution Records ($5,560 in 11/88-2/88 per FEC reports
- Signed Bank Confirmation as of 4/20/88

(b) FEC reports to file
- Post 2/88

IL Delegate Comtes

4. 3rd District Delegates — South Holland, IL
(a) Records needed:
- Bank Statements (Pre and Post 3/88)
- Disbursement Records for $731.35 (See W/P ____) and any Pre and Post 3/88.
- Contribution Records (Need support for all but Lagestee and Thomas ($600) - Ron ($300), Chuck Mayer ($200), Gibbons ($200)
- Signed Bank Confirmation as of 4/3d/88 (This comte never officially authorized by DFP)

(b) FEC reports to file:
- covering all activity

5. 4th C.D. Delegate Comte — Flossmoor, IL
(a) Records needed:
- Bank Statements (Post 3/15/88)
- Disbursement Records for $910.74 (See W/P ____) and beyond 3/15/88

Addenda:

23040955452

Exhibit G - Attachment 1
Page 5 of 11

DOLE FOR PRESIDENT

(ASSIGNMENT) Results of Delegate
(SUBJECT) Comtes Review

PREPARED BY MLF DATE 10/11/88
LEAD AUDITOR APPROVAL
PAGE 3 OF 8

4th C.D. (cont'd):

-Contribution Records - Check copies reviewed in support of 5 $500 contributions.
- Signed Bank Confirmation as of 4/30/88

(b) FEC reports to file:

- 2/88 in records but never filed
- 3/88 in records but never filed
- Post 3/88

6. 6th C.D Delegate Comte Elmhurst, IL

(a) Records needed:

- Bank Statements - Entire period (Post 1/88)
- Disbursement Records for $11,573.41 (See W/P ____) and beyond 3/88
- Contribution Records - Check copies reviewed in support of $11,000 (per FEC = $11,025)
- Signed Bank Confirmation as of 4/30/88

(b) FEC reports to file:

- Post 3/88

7. 8th C.D. Delegate Comte Chicago, IL

(a) Records needed:

- Bank Statements - Entire period (Post 1/88)
- Disbursement Records for $2,441.76 (See W/P ____ and any add'l beyond 2/88.
- Contribution Records - (per FEC = same) Entire period

Addenda:

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Exhibit C - Attachment 1
Page 6 of 11

Audit Division (1/88)

DOLE FOR PRESIDENT

(ASSIGNMENT) Results of Delegate
(SUBJECT) Comte's Review

PREPARED BY: MLF | DATE: 10/11/88
LEAD AUDITOR APPROVAL:
PAGE 4 OF 8

8th C.D. (cont'd):
- Signed Bank Confirmation as of 4/30/88

(b) FEC reports to file:
Entire period
(This comte never officially authorized by DFP)

8. 9th C.D. Delegate Comte — Chicago, IL
(a) Records needed:
- Bank Statements - Entire period (Post 2/88)
- Disbursement Records for $5,565.39 (See W/P ____) and any add'l items if necessary
- Contribution Records - Entire period (per bank - 4,565.39 ①)
- Signed Bank Confirmation as of 4/30/88

(b) FEC reports ok
(This comte never officially authorized by DFP)

9. 10th C.D. Delegate Comte — Deerfield, IL
(a) Records needed:
- Bank Statements 2/88, post 4/88
- Disbursement Records for $ 2,039.10 (See W/P ____) and beyond 4/88.
- Contribution Records - Check copies reviewed in support of $6,223.32.
- Signed Bank Confirmation as of 4/30/88

(b) FEC reports to file:
- 3/88 in records, not filed; 4/88 and beyond

Addenda: ① Includes $4,000 Loan

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Exhibit G - Attachment 1
Page 7 of 11

Audit Division (1/87)

DOLE FOR PRESIDENT

(ASSIGNMENT) Results of Delegate
(SUBJECT) Contest Review

PREPARED BY: MLF | DATE: 10/11/88
LEAD AUDITOR APPROVAL:
PAGE 5 OF 8

10. 12th C.D. Delegate Comte. Antioch, IL
(a) Records needed:
- Bank Statements - 2/88, 4/88
- Disbursement Records for $3,135.77 (See W/P), Post 4/88
- Contribution Records - check copies reviewed in support of $3,168.00
- Signed Bank Confirmation as of 4/30/88

(b) FEC reports to file:
- 3/88, 4/88

11. 13th C.D. Delegate Comte Glen Ellyn, IL
(a) Records needed:
- Bank Statements Post 3/88
- Disbursement Records for $2,364.90 (See W/P) and Post 3/88
- Contribution Records FEC Rep. 2/88 is ok
No records for $1,792.50 reported 3/88.
- Signed Bank Confirmation as of 4/30/88

(b) FEC reports to file:
- 3/88 in records, not filed; 4/88 and beyond

12. 14th C.D. Delegate Comte W. Chicago, IL
(a) Records needed:
- Bank Statements: 11/88, 2/88, 4/88
- Disbursement Records for $1,417.00

Addenda:

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DOLE FOR PRESIDENT

(ASSIGNMENT) Results of Delegate
(SUBJECT) Comte Review

PREPARED BY: MLF | DATE: 1/11/89
LEAD AUDITOR APPROVAL:

14th C.D. (cont'd):
(See W/P ___) and any add'l items.
- Contribution Records - Check copies reviewed in support of $5,000 (1/88)
- Signed Bank Confirmation as of 4/30/88

(b) FEC reports to file:
- Pre 1/91/88

13. 15th C.D. Delegate Comte — Pontiac, IL
(a) Records needed:
- Bank Statements — Post 3/88
- Disbursement Records for $60.75 (See W/P ___) and any add'l items.
- Contribution Records - Listing and CK copies total $3,517.00.
- Signed Bank Confirmation as of 4/30/88

(b) FEC reports to file:
- Post 3/88

14. 17th C.D. Delegate Comte — Geneseo, IL
(a) Records needed:
- Bank Statements — 4/88 and beyond
- Disbursement Records for $70.03 (See W/P ___) and beyond 4/88
- Contribution Records CK copies = $3,130.00 (Per Bank = $3,273.20)
- Signed Bank Confirmation as of 4/30/88

(b) FEC reports to file: Entire period

Addenda:

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DOLE FOR PRESIDENT

(ASSIGNMENT) Results of Delegate
(SUBJECT) Comte Review

PREPARED BY: MLY | DATE: 10/21/88
LEAD AUDITOR APPROVAL:

15. 18th C.D. Delegate Comte — Chicago, IL
(a) Records needed:
- No records in file
- Signed Bank Confirmation as of 4/30/88

(b) FEC reports to file: Entire period
(This comte never registered and was never authorized by DFP)

16. 19th C.D. Delegate Comte — Urbana, IL
(a) Records needed:
- Bank Statements Post 4/88
- Disbursements are supported
- Contribution Records Listing = $4,380. Check Copies = 4,301.25 (Per Bank $4,790.75)
- Signed Bank Confirmation as of 4/30/88

(b) FEC reports to file:
12/87, 1/88, 3/88 and beyond

17. 20th C.D. Delegate Comte — Springfield, IL
(a) Records needed:
- Bank Statements Post 4/7/88
- Disbursement Records for $6,002.64 (See W/P ___) and beyond 4/7/88
- Contribution Records: CK copies and Cash Receipts = $3,390 (Recs: Per Bank $6,045 Per FEC Rep. 7,999.93)
- Signed Bank Confirmation as of 4/30/88

(b) FEC reports to file: all filed

Addenda:

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DOLE FOR PRESIDENT

(ASSIGNMENT) Results of Delegate
(SUBJECT) Contact Review

PREPARED BY: MLF | DATE: 10/20/88
LEAD AUDITOR APPROVAL:
PAGE 8 OF 8

18. Vote Dole Delegates — Caseyville, IL

(a) Records needed:
- Bank Statements Entire period
- Disbursement Records for $1,850.00 (See W/P) and any add'l items.
- Contribution Records: CK copies in support of 1,850.00. FEC reports total $1914.35.
- Signed Bank Confirmation as of 4/30/88

(b) FEC reports to file:
Post 2/88

Addenda:

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DOLE FOR PRESIDENT COMMITTEE

93040955459

"Testing the Waters" Expenditures Made by Campaign America

Section 9034.4(a)(2) of Title 11 of the Code of Federal Regulations states that even though incurred prior to the date an individual becomes a candidate, payments made for the purpose of determining whether an individual should become a candidate, such as those incurred in conducting a poll, shall be considered qualified campaign expenses if the individual subsequently becomes a candidate and shall count against the candidate's limits under 2 U.S.C. 441a(b).

Section 100.8(b)(1) of Title 11 of the Code of Federal Regulations states, in part, that the term "expenditure" does not include payments made solely for the purpose of determining whether an individual should become a candidate. If the individual subsequently becomes a candidate, the payments made are subject to the reporting requirements of the Act. Such expenditures must be reported with the first report filed by the principal campaign committee of the candidate, regardless of the date the payments were made.

Section 100.7(a) of Title 11 of the Code of Federal Regulations states that a contribution includes a gift, subscription, loan, advance or deposit of money or anything of value by any person for the purpose of influencing any election for Federal office. The term "anything of value" includes in-kind contributions.

Finally, Section 100.5(g) of Title 11 of the Code of Federal Regulations states that affiliated committees include all authorized committees of the same candidate and all committees established, financed, maintained or controlled by the same corporation, labor organization, person or group of persons.

The Audit staff reviewed the disclosure reports filed with the Federal Election Commission by Campaign America (CA), a registered multicandidate committee associated with the candidate. The review was intended to determine if any of the activity disclosed by CA appeared to relate to the Presidential campaign. A group of transactions were identified from the CA reports which were questioned as possible testing-the-water expenses. A request for the records relating to these transactions was made by the Audit staff and again by the Commission. After both were refused, the requested records were subpoenaed by the Commission.

Campaign America registered with the Commission in March 1978. As background, Attachment 1 shows Receipts, Disbursements and year end Cash On Hand for each year from 1978 through 1988. A significant increase in activity is noted in 1986 and the first quarter of 1987. According to a copy of a newsletter provided by CA Senator Dole is the "Honorary Chairman" of CA.

As noted above, certain records were obtained from CA via subpoena. The records obtained were for the period August, 1986 through April 1987 and included cancelled checks and related invoices for disbursements to vendors and persons shown on CA reports as having an Iowa or New Hampshire address. The interim audit report presented an analysis of the documents obtained along with related activity noted in CA reports. Based on that analysis, the interim audit report concluded that the records indicate the possibility of a "testing-the-waters" campaign by CA on behalf of the Committee. It was also noted that the information obtained was limited to payees with an Iowa or New Hampshire address and therefore omitted many possible "testing-the-waters" disbursements made to payees with addresses outside of those States.

The interim audit report also stated that the disbursements which were considered potential "testing-the-waters" in Iowa total $210,049.41. Of that amount, $173,826.46 was believed attributable to the Iowa spending limitation. In New Hampshire the total was $24,775.11 with $23,329.73 attributed to the spending limitation. It was also noted that for purposes of the review the "5-day rule" as set forth in 11 C.F.R. § 106.2(b)(2)(iii) was not applied because the persons involved were CA personnel not Presidential Committee workers. Though the allocable amounts were stated in the report, they were not included in the preliminary calculation of amounts in excess of the Iowa and New Hampshire spending limitations pending the Committee response to the interim audit report and the review of additional records.

In the interim audit report it was recommended that the Committee provide all documents associated with disbursements made by Campaign America and/or any state level account, division or committee which relate in any way to Iowa or New Hampshire for the period January 1, 1986 through March 31, 1987.

In addition, the Committee was requested to provide the following:

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1. The script(s) used for the telemarketing program that was conducted in Iowa in October and November, 1986;

2. The follow-up letter(s) used for the telemarketing program that was conducted in Iowa in October and November, 1986; and

3. All documents including, but not limited to invitations, hand-outs, press releases, flyers, transcripts, and speeches which relate to appearances made by Senator Dole in Iowa and New Hampshire.

In a separate letter to CA's Treasurer, the Commission requested that CA provide documents relating to disbursements made by Campaign America in Iowa and New Hampshire in connection with the presidential campaign of Senator Robert Dole that were not previously provided and specifically:

"1. All documents relating to all disbursements made by Campaign America Iowa Division and Campaign America New Hampshire from January 1, 1986, to March 31, 1987. This request includes, but is not limited to invoices, canceled checks, debit memoranda, bank statements, signature cards, and accounting records.

"2. The following documents:

a. the script(s) used for the telemarketing program that was conducted in Iowa in October and November, 1986;

b. the follow-up letter(s) used for the telemarketing program that was conducted in Iowa in October and November, 1986; and,

c. all documents including, but not limited to invitations, hand-outs, press releases, flyers, transcripts, and speeches which relate to appearances made by Senator Dole in Iowa and New Hampshire."

In its response to the interim audit report the Committee treasurer states that "DFP strongly, but respectfully, objects to this recommendation. The two are separate committees. DFP is not required to maintain CA's records nor has it maintained such records. As such, DFP is unable to provide any requested records." The Committee provided no further information.

However, Counsel for CA responded to the request for records made of that committee. Though denying any CA disbursements were in connection Senator Dole's presidential campaign, copies of documents, including bank statements invoices and canceled checks for expenditures relating to Iowa or New Hampshire were provided. In addition, CA provided the script and

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related documents used for the telemarketing program in Iowa; a follow up letter associated with the telemarketing effort, and several documents relating to CA speeches made by Senator Dole in Iowa and New Hampshire.

The conclusions presented below are based on an analysis of the documents provided by CA in response to the request for records, material obtained via subpoena and discussed in the interim audit report, CA and other committee disclosure reports, and Committee records.

a. Iowa

The Audit staff concludes that CA engaged in Presidential testing-the-water activity in 1986 and 1987 and that portions of that activity are allocable to the Iowa spending limitation. Specific programs and types of expenses are discussed below:

i. Telemarketing

The largest single program that CA conducted in Iowa appears to be a telemarketing program which took place in October and November of 1986. According to the telemarketing contract, the phone calls were to begin on October 16, 1986 and be completed by October 30, 1986. The election date was November 4, 1986. The contract stated that people who responded favorably to the survey would be sent a follow-up letter. An additional series of phone calls was added later and were to be completed by November 2, 1986.

The Reports Analysis Division questioned CA about the telemarketing program. In a letter from Judith Taggart, CA Treasurer, dated June 24, 1987 it was explained that this program was "to determine the best means for supporting 1986 state and federal candidates" and "no Iowa candidates were named in this effort, thus the expenditure was general party building." In correspondence, this telemarketing effort is referred to as either Iowa Phone Program, Get Out the Vote Program, or survey.

In a letter from the telemarketing firm to the treasurer of CA, the telemarketing firm noted that "Floyd Brown, your field representative for this region has been extremely helpful in making this survey most successful for Senator Dole." (emphasis added)

The Audit staff reviewed the CA disclosure reports to identify candidates and committees supported by CA between October 16, and November 4, 1986. Only $7,750 was spent by CA in direct support; $3,000 for Federal candidates, $2,500 for

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State candidates and $2,250 for local party committees. In addition, in-kind disbursements totaling $9,791.98 for the follow-up mailing mentioned in the telemarketing contract were reported to seven state candidates.

In response to the Commission's request for records associated with the interim audit report, CA submitted additional documentation for the telemarketing program.

An early August 1986 CA internal memorandum states that the purpose of the program would be "To assist Governor Branstad and other state and local candidates in Iowa by conducting a GOTV program featuring the Majority Leader" (emphasis added). Under "outline" the memo states that Republican voters would be called and asked their position on state and local elections, whose endorsement would make them more likely to support the GOP candidates, queried about their attitude on farm policy, and finally, tested on their level of participation. Certain respondents then were to receive a follow-up letter. (See Memorandum at Attachment 2)

Campaign America also submitted what appears to be a proposal from the telemarketing firm. The proposal is addressed to Mr. Tom Synhorst (see discussion of Mr. Synhorst's activity below). Though the proposed program is more ambitious than that carried out, the proposal lists three major objectives:

1. To contact 228,000 Iowans and determine whether the endorsement of each of seven prominent individuals is more or less likely to influence their supporting the Governor in the November election.

2. To record each person's attitude to the above mentioned questions and store this information for future telemarketing based on their response. Those showing a favorable response to a particular individual's endorsement were to be re-contacted within the final weeks before election.

3. To cost effectively provide high quality and accurate survey data that can be utilized throughout the project at the client's discretion. (See Attachment 3).

Included with the telemarketing documents is a copy of the script apparently used in the program. It contains six questions. The first two ask if the respondent supports Governor Branstad and his statewide ticket, and a named Republican candidate for the legislature. The third and fourth questions are the same, but request a first and second choice. The question is which of the listed leaders' endorsement would most likely cause

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the respondent to vote for a candidate in the 1986 general elections. The list of leaders contains the names of eight Republicans, including Senator Dole, who were, at that time, considered presidential hopefuls. Question five asks for approval or disapproval of the Reagan administration farm policy and question six seeks to determine respondent participation in the election process. Six participation choices are given; General Elections, Republican Primaries, Presidential Caucuses, County Republican Convention, Contributions to Republican Candidates, Volunteer for Candidates. By late October 1986, few of these choices would seem to be relevant to the 1986 election cycle. (See Attachment 4).

Two documents showing survey results were provided. The first is on the telemarketing firm's letterhead, dated October 31, 1986, and addresses only questions 3 and 4. The analysis provides "B.D. responders" for each question. (See Attachment 5)

The second document is a computer printout and appears to be a more thorough analysis of the results. The results for questions 3 and 4 are entitled President, 1st and President, 2nd.*/ (See Attachment 6)

It is the opinion of the Audit staff that given the questions asked during this survey and that Governor Branstad appears to be a supporter of Senator Dole (see discussion below of "Agricultural Summit" held in late November 1986 and co-hosted by Senator Dole and Governor Branstad), the primary purpose of this telemarketing effort was testing-the-waters and the costs are allocable to Iowa. Campaign America paid the telemarketing firm $70,859.65 for their services.

In addition to the expenses discussed above, CA paid a Washington area firm $8,010.67 to purchase and edit the Iowa Republican voter tape, print survey cards, print labels, keypunch telephone canvass card data, update the master file with survey data, and print selected "Dole favorable" labels. These costs are also allocable to Iowa. Campaign America also made three payments in early 1987 to this vendor for services described as selecting and printing of Dole favorables; computer tapes of Dole favorable (first choice), Dole favorable (second choice); and

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*/ On the copy of the telemarketing script provided by CA, Senator Jesse Helms is listed among the leaders for questions 3 and 4. On the summary of survey results, Senator Helms has been replaced by Alexander Haig.

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selecting and printing labels for persons in selected Iowa counties. These invoices suggest use of the survey data with respect to CA events in Iowa during January and February 1987. The three payments total $979.60 and are allocable to Iowa.

The Committee used the services of this same vendor and made payments to the vendor in excess of $400,000.

Campaign America provided documentation for the telemarketing follow-up letters. The cost of printing and mailing 58,000 letters was $11,091.98. An apparent draft of the letter was submitted. The letter encourages the addressees to vote for Governor Branstad and points out Senator Dole's leadership on agricultural issues. (See Attachment 7)

Campaign America reported these expenses as in-kind contributions to seven Iowa candidates. The cost of this letter is allocable to Iowa. Attachment 8 is a summary of the telemarketing expenses.

ii. Events

The CA records made available indicate that at least 19 events, speeches, or meetings were held in Iowa between March 31, 1986 and February 23, 1987. These records also indicate that Senator Dole was present for 17 of the events. Though the available records do not establish the nature of all of the events the following items are noted:

- In mid April 1986, CA paid expenses for receptions in Wapello, Iowa. Available records do not establish the attendees or the purpose of the event.
- In early May 1986, Senator Dole and 8 other persons were in Iowa for the Iowa Republican Congressional District Conventions.
- In June 1986, Senator Dole and three others were in Iowa for the Iowa Republican Convention.
- In late July 1986 Senator Dole is shown as the "Special Guest" at a picnic in Atlantic, Iowa sponsored by the Fifth District Republican Party.
- In late August, 1986 Senator Dole and 6 others were in Iowa for the Iowa State Fair. CA paid for a backdrop and flags which were delivered to the fairgrounds.

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- In mid September 1986, Senator Dole and three others were in Iowa for "Senator Grassley Birthday Events".

- In mid October 1986, a "Steering Committee Meeting" was held in Des Moines. At least four CA personnel attended.

- In late October 1986 Senator Dole visited at least three cities in Iowa along with six other persons whose expenses were paid by CA.

- In late November, 1986 Senator Dole and Iowa Governor Terry Branstad hosted a "farm summit" in Des Moines. CA paid travel expenses for Senator Dole and 4 other persons.

- In early December 1986, Senator Dole and three others traveled to Iowa for an address by Senator Dole before the Iowa Sheriff's and Deputies Association.

- In mid January 1987. Senator Dole traveled to Iowa for an address before the Iowa Lumbermens Association. Other documentation submitted suggests that other groups may have been addressed during this time.

- In late January 1987, Senator Dole traveled to Iowa to address the "AGC". The documentation indicates the topics related to the construction industry.

- Campaign America sponsored at least three "Town Meetings" in Iowa. Documentation provided indicates that the events occurred on 2/7/87 in Orange City, Iowa; 2/12/87 in Dubuque, Iowa and 2/22/87 in Des Moines. These events appear to be similar to the events of the same name sponsored by the Presidential Committee. The 2/22/87 Town Meeting occurred after the beginning of the Presidential Committee activity. (The Committee's earliest reported expenditure is 2/10/87 and the Committee's first bank account opened on 2/18/87).

  The invitation postcards were printed by the same Iowa firm who printed the later cards for the Committee. The postcard for the February 22, 1987 town meeting appears to be the same size and format as those used by the Committee, and uses the same photograph of Senator Dole. No samples for the

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others are available. The postcard for the February 22, 1987 event begins with the message "With the 1986 campaign behind us, Republican voters and candidates clearly have major challenges ahead in 1988. During this meeting I would like to hear your views and concerns while sharing some of my own with you regarding our shared Republican future." A flyer associated with the same printing bill is entitled "Bob Dole on the Issues" and includes a quote from the Washington Times of January 15, 1987 which begins "If Sen. Robert Dole is running for the White House, he's off on the right foot."

In addition on February 7, 1987 Senator Dole addressed the Iowa Bankers Association in Sioux City. In the text of that speech Senator Dole comments "Sioux City is one of my favorite places. In fact, lately, any place in or near Iowa is one of my favorite places." (See Attachment 9, p. 1)

In a memorandum dated February 18, 1987 titled "Iowa talking points" under the sub heading "General Objectives of Iowa Talking Points" the following appears:

"Offer Iowans a Friend in the White House. If candidates are confronted with questions: How should your PAST commitments assure Iowans that if you are elected Iowa will have a friend in the White House..." (emphasis in original). (See Attachment 10, p. 4)

- Finally, on February 23, 1987 CA paid for a breakfast for 53 people in Davenport, Iowa. The talking points memorandum noted above begins with a section titled Quad Cities Issues.*/

During the period covered by these meetings and events Senator Dole appears to have made 17 trips to Iowa and visited 18 different cities some repeatedly. The costs associated with these events which are not included elsewhere total $76,403.80 of which $30,268.81 is allocable to Iowa. Attachment 11 includes a listing of events and associated expenses.

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*/ Davenport, IA., Bettendorf, IA., Moline IL., and Rock Island, IL., comprise the Quad Cities.

iii. Campaign America Iowa Staff

In addition to the Iowa activity discussed above, CA records show a significant staff effort in Iowa during 1986 and early 1987.

- Floyd Brown: Mr. Brown's mailing address is in the Washington D.C. area. Available records indicate that he was on the CA payroll effective mid March 1986 through late February 1987. He was on the Committee payroll effective March 16, 1987 with the title of Regional Director for IL, IN, IA, ND, SD, WI, MN, NE, and MO.

During his employment at CA, records reviewed indicate that Mr. Brown made 29 trips to Iowa of 1 to 6 days in duration. He was in Iowa before and/or during nearly all CA Iowa events, trips by Senator Dole and for various meetings with CA Iowa based staff. (See above.) During a number of these trips Mr. Brown paid for his expenses as well as those of other staff persons.

As noted in the discussion of the telemarketing program, a letter from the telemarketing firm in Des Moines refers to Floyd Brown as CA's field representative for that region. In late October he attended a "Steering Committee Meeting" in Des Moines. A note on records relating to a late November, 1986 trip states that he will meet with one of the Iowa CA staff concerning the "90 day plan." It is noted that this trip occurred after the 1986 election and that 90 days from the date of the trip would correspond to the beginning of Committee activity. Mr. Brown's expenses for this trip were paid by CA.

Though Mr. Brown travelled to other states on occasion, it is the opinion of the Audit staff that the records reviewed to date indicate that Mr. Brown's primary focus was on the state of Iowa and that when viewed in light of the other CA activities discussed below, his salary and expenses should be considered testing-the-waters expenditures. Attachment 12 shows Mr. Brown's travel and salary. Payments to Mr. Brown totaled $47,823.40, of which $38,052.40 is allocable to the Iowa spending limitation. (See also Attachment 11 Events)

As noted above, given that during this time Mr. Brown was not a Committee staff person, no attempt has been made to apply the 5-day rule at 11 C.F.R. § 106.2(b)(2)(iii).

- Tom Synhorst: Mr. Synhorst appears to be the second CA staff person who has a Washington D.C. area address and whose primary focus was in Iowa. Mr. Synhorst received consulting payments of $1,000 per month which appear to cover the period

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April through December of 1986 and salary for January/February 1987. The earliest expense request noted from Mr. Synhorst is for a trip in January 1987. However, other documents reviewed indicate that he was in Iowa earlier on several occasions beginning in March of 1986. It was also noted that Mr. Synhorst received consulting payments through November of 1986, as well as expense reimbursements, from the 1986 re-election campaign of Iowa Senator Grassley. Given his involvement in that campaign, it seems likely that he visited Iowa earlier in the year 1986 while receiving consulting payments from CA.

It was also noted that Mr. Synhorst held meetings or job interviews with several persons in Iowa. With the exception of one expense reimbursement these persons were not paid by CA, but in at least two cases, worked for the Committee.

The proposal from the telemarketing firm which handled the telemarketing program discussed above was addressed to Mr. Synhorst and dated August 1986.

Also the postage for the follow up letters associated with the telemarketing program ($5,950.00) was apparently paid by Mr. Synhorst in Des Moines during the later part of October and reimbursed by CA. A memo from Mr. Synhorst apparently faxed from Senator Grassley's office requests checks for postage, printing and mailing. The postage check was made payable to Mr. Synhorst. According to the documentation submitted, the printing and mailing checks were dated October 27, 1986 and were "Federal Expressed" to Mr. Synhorst at Senator Grassley's Des Moines campaign office.

Mr. Synhorst is shown in Committee files as the addressee for telephone and electric bills for the Committee's Des Moines apartment beginning on February 17, 1987 for the electric service and February 13, 1987 for telephone service. Both of these dates are during his employment with CA and before the final CA Town Meeting. Two of his expense vouchers paid by CA in February contain charges for the security deposit and the first rent payment for the apartment. Mr. Synhorst notes that this is where he and the "National Staff" will stay when in Iowa. Mr. Synhorst also submitted an expense reimbursement request to the Presidential Committee dated February 4, 1987 to cover a clipping service. This request was made while he was employed by CA.

Mr. Synhorst is shown on the Committee's staff list as a regional director for Iowa and Kansas.

Mr. Synhorst' salary and expenses total $20,955.78. The amount allocable to the Iowa spending limitation is $17,688.78. As with Floyd Brown, the 5-day rule is not

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considered to be applicable. A schedule of Mr. Synhorst's activity is at Attachment 13.

In addition to Messrs. Brown and Synhorst, CA retained the services of seven individuals with Iowa addresses during parts of 1986 and early 1987. Each is briefly discussed below.

- Jane Voights: Ms. Voights was employed between mid June and the end of August 1986. She had a telephone in her name which CA paid for and which was referred to as CA's Iowa telephone. Her expenses were for car rentals, meals, mileage, supplies, lodging, stamps, etc. There was one shipping bill which described the contents as "Campaign Literature." The date and location to which the material was shipped corresponds to a late July event in Atlantic, Iowa.

Available records indicate that Ms. Voights was associated with at least four meetings or events in Iowa. One in late June at the time of the Iowa Republican Party convention, a late July event where Senator Dole was to appear, an early August meeting in Des Moines, and an October event in Council Bluffs. Consulting fees and expenses for Ms. Voights total $5,049.89. The entire amount is allocable to the Iowa spending limitation. Ms. Voights received no payments from the Committee.

- John Rehmann: Mr. Rehmann was a paid consultant from July 1986 to January 1987. His expense reports indicate meals, telephone, and supplies. Like Ms. Voights he is associated with the late July event where Senator Dole was to appear.

He notes having attended a "strategy committee meeting" on October 22, 1986. He also notes expenses involved with the leasing of office space and gives an approximate location in Des Moines. CA shows no payments for Iowa office space but the Committee's Iowa office was located in the vicinity mentioned by Mr. Rehmann. Mr. Rehmann's consulting and expenses total $3,734.13, of which $3,729.43 is allocable to Iowa.

The Committee paid Mr. Rehmann consulting fees and expenses from mid-December, 1987 to mid-March, 1988.

- Cal Hultman: Mr. Hultman was paid a consulting fee from September 1986 until March 1987 and travel expenses. He notes having attended the October 22, 1986 "steering committee meeting" in Des Moines.

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He also is associated with the late October, 1986 event noted above under Jane Voights. Mr. Hultman's fees and expenses total $12,022.61, of which $12,016.00 is allocable to Iowa. The Committee made no disbursements to Mr. Hultman.

- Penny Brown: Ms. Brown was paid a consulting fee for December 1986, and January 1987. She also received expense reimbursements. Available documentation indicates that Ms. Brown was associated with a December 7, 1986 visit by Senator Dole. (See Event listing at Attachment 11) Total payments to Ms. Brown are $5,947.02, of which $4,892.42 is allocable to Iowa. The Committee made no payments to Ms. Brown. Like Mr. Synhorst, Ms. Brown was an employee of the Grassley Committee in 1986.

- Jeff Nelson: Mr. Nelson was paid two consulting payments, one in November, 1986, and one in January, 1987. These payments total $3,500.00 and are considered allocable to Iowa. Mr. Nelson received no payments from the Committee.

- Carol Lehmkuhl: Ms. Lehmkuhl was paid one consulting payment of $1,200 on March 4, 1987. She received her first Committee salary check on April 1, 1987 and was shown by the Committee as the Des Moines Office Manager. Like Mr. Synhorst and Ms. Brown , Ms. Lehmkuhl was an employee of the Grassley Committee in 1986. The $1,200 payment is allocable to Iowa.

- Wythe Willey: Mr. Willey received one $4,000 consulting fee to cover January and February 1987. He received no payments from the Committee. This payment is considered to be allocable to Iowa.

Attachment 14 is a listing of the Iowa staff expenses.

iv. Miscellaneous Iowa Expenses

Finally, there are a number of other Iowa expenses not included in the above categories. These include miscellaneous travel to Iowa, postage for Iowa mailings, charter costs for a trip to Cedar Rapids, and expenses for a December 1986 Washington, D.C. breakfast meeting concerning Iowa telecommunications. These expenses total $3,746.93 of which $3,097.93 is allocable to the Iowa spending limitation. (See Attachment 15)

The expenses discussed above indicate that CA engaged in activities in Iowa during 1986 and early 1987 which appear to be for the purpose of advancing Senator Dole's candidacy for nomination for the Office of President. The expenses show a significant staff presence in the State, a series of events and

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meetings many of which were attended by Senator Dole as well as addresses to various Iowa groups by the Senator. A substantial telemarketing program was undertaken to determine Senator Dole's strength compared to likely Presidential opponents and to identify potential supporters. In 1987, the CA Iowa staff also appear to have been making preparations for the Committee's Iowa effort. It is also noted that Senator Dole was seeking re-election to the Senate from Kansas in 1986. A summary of CA's Iowa Expenses is shown below:

Category	Iowa Allocable Amount	Iowa Non-Allocable Amount
Telemarketing Program	$90,941.90	$ -0-
Events	30,268.81	46,134.99
Staff Expenses		
F. Brown and T. Synhorst	55,741.18	13,038.00
Iowa Based Staff	34,387.74	1,061.21
Miscellaneous	3,097.93	649.00
TOTAL	$214,437.56	$60,883.20

b. New Hampshire

Similar to Iowa, CA was active in New Hampshire in the later part of 1986 and early 1987. Though the program appears to be smaller, the types of activity are similar and the conclusion concerning testing-the-waters is the same.

i. Events

Like Iowa, CA held a number of New Hampshire meetings, events or groups of events between March 1986 and February 1987. Available records indicate nine such events and it appears that Senator Dole was in attendance at seven of the nine. Listed below is specific information about these events.

- A meeting and luncheon for 18 people, including Senator Dole, was held in New Hampshire in early March 1986.

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- In mid June 1986, Senator Dole and at least 2 other CA staff attended a "Rudman Event" in Manchester, New Hampshire.

- Donald Devine*/ and Paul Russo were in New Hampshire between June 18 and 20, 1986.

- A series of events were held in New Hampshire between August 24 and 29, 1986. Senator Dole was in New Hampshire for the majority of this time. Available records make note of a photo opportunity, a Dole banquet and a luncheon. One expense voucher refers to the "Liberty Weekend." In addition to some New Hampshire residents who were reimbursed for expenses, at least 5 others were in attendance including Secretary Dole. A bill from a photographer includes a charge for making a video tape of the Liberty Weekend. A memorandum from Suzanne Niemela notes that money was collected at the door of one event and paid directly to the restaurant. This memorandum also notes that seven checks made payable to the "Dole Committee" were collected and that Ms. Niemela needed assistance in cashing them. She states that "[t]hey should be deposited in the Campaign America PAC or 'Dole Committee' and a new check should be cut for the Greenhouse Restaurant."

- Campaign America paid for a hospitality suite on October 5, 1986 for the "Republican Convention."

- On October 24, 1986, Suzanne Niemela rented a backdrop, podium and public address system for a news conference.

- Between December 11 and 13, 1986, Senator Dole made two trips to New Hampshire. On December 12, food was purchased for a meeting. Also, a meeting room was rented and refreshments for 40 guests were ordered. Records further indicate that Senator Dole addressed the Portsmouth Rotary Club on December 11, 1986 and the University of New Hampshire commencement on December 13, 1986.

- Senator Dole visited two locations in New Hampshire between January 24 and 26, 1987. On January 25, CA paid for brunch for 67 people.

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*/ According to documents provided by CA, Donald J. Devine was the "Consulting Director" for CA.

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- Senator Dole was in New Hampshire on February 16, 1987 to address the Keene Rotary Club. Campaign America paid for a hospitality suite and refreshments for 90 people and a breakfast for 60 people.

Expenses for these events not considered elsewhere total $25,142.30, of which $16,019.91 is allocable to the New Hampshire spending limitation. Attachment 16 is a listing of these events.

ii. Voter Lists

The auditors reviewed documentation related to 117 payments, totaling $3,136.26, to various New Hampshire towns for the purchase of Voter Lists. The dates of payments for these lists were between October 16, 1986 and January 29, 1987, although it appears that the initial request was made by letter, signed by Ms. Niemela, on October 3, 1986.

iii. Telephone Expenses

Campaign America paid for a business telephone in New Hampshire. No record of payments for any office facility is noted in the available records and the documentation provided does not show an address. The telephone bills indicate that the service was maintained by CA between October 1, 1986 and February 24, 1987 at a cost of $2,223.16. Of this amount, $1,381.03 is allocable to the New Hampshire spending limitation. It was also learned that the Committee paid the telephone bill for the same telephone number covering the period February 25 to March 24, 1987.

iv. New Hampshire Staff

Campaign America employed three persons who appear to have worked on the New Hampshire programs.

Paul Russo: Mr. Russo was a Washington area consultant. Campaign America's reports indicate that Mr. Russo received his first consulting payment on April 1, 1986. This payment was likely to cover the month of March, 1986. His first expense reimbursement is reported as a March 12, 1986 transaction. No documentation was submitted by CA for payments made to Mr. Russo before June 1, 1986. In addition, no documentation was submitted for a June 30, 1986 expense reimbursement. Available documentation indicates that between the beginning of June 1986 and the end of August, 1986, all of Mr. Russo's travel was to New Hampshire. No travel reimbursements are reported after the August, 1986 trip. Mr. Russo received his last consulting payment on October 3, 1986.

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A copy of a memorandum from Mr. Russo indicates that he had hired Suzanne Niemela (see below) "to work the New England Region for Campaign America, establishing a 'desk' in Concord, New Hampshire." As noted below, Ms. Niemela worked only in New Hampshire. It is also noted that Mr. Russo made a trip to Iowa during the first week of May, 1986.

Mr. Russo's consulting payments for June through August, 1986 are considered to be New Hampshire expenses. These payments total $13,461.12 of which $12,341.63 is allocable to the New Hampshire spending limitation.

The Committee made no payments to Mr. Russo. Attachment 17 is a schedule of the CA payments to Mr. Russo considered to be allocable to New Hampshire.

Suzanne Niemela: Ms. Niemela was hired effective July 1, 1986. On or about August 1, 1986, Ms. Niemela moved from Massachusetts to Concord, New Hampshire. Her moving expenses were paid by CA. Available documentation indicates that with the exception of one trip to the Washington D.C. area, Ms. Niemela worked exclusively in New Hampshire. She received consulting fees during the period July 1986 to February 1987 and expense reimbursements covering activity from September 1986 to February 1987. Expenses include phone, travel, supplies, copiers, typewriter rental, etc. Beginning in March 1987, Ms. Niemela received a salary from the Committee and is shown by the Committee under New Hampshire staff - Regional Advance and Scheduling.

Attachment 18 shows CA payments to Ms. Niemela. Payments related to New Hampshire total $17,959.91 with $17,818.26 being allocable to the New Hampshire spending limitation.

Finally, documentation was submitted for a New Hampshire trip made by a Mr. Jim Murphy on February 26 and 27, 1987. The only other payment to Mr. Murphy by CA was a $1,250 consulting payment reported on March 12, 1987. Committee records indicate that Mr. Murphy was to be the Northeast Regional Director. A March 11, 1987 Letter of Agreement between the Committee and Mr. Murphy also notes that he was to be paid $1,250 as a consulting fee for the period March 1, to March 15, 1987. The amount was paid on March 13, 1987. Committee documentation also indicates that Mr. Murphy was expected to live in the Boston area for the duration of the Campaign. On March 11, 1987, Mr. Murphy drove his car to Boston to "Begin Job." Mr. Murphy was later named the head of the Political Field Division and moved to the Washington area. He was on the Committee's payroll effective March 16, 1987. Total payments for Mr. Murphy by CA are $1,590.60 of which $1,417.50 are allocable to New Hampshire.

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The following is a summary of CA expenses which relate to New Hampshire:

Category	New Hampshire Allocable Amount	New Hampshire Non-Allocable Amount
Events	$16,025.71	$ 9,122.39
Voter Lists	3,136.26	-0-
Telephone	1,381.03	842.13
New Hampshire Staff Expense		
Suzanne Niemela & Paul Russo	30,159.89	1,261.14
Jim Murphy	1,417.50	173.10
TOTAL	$52,120.39	$ 11,398.76

The expenses discussed above indicate that CA engaged in activities in New Hampshire during 1986 and early 1987 which appear to be for the purpose of advancing Senator Dole's candidacy for nomination for the Office of President. The expenses show a staff presence, a series of political events and an effort to accumulate voter lists.

Newsletter

Campaign America also provided a copy of a newsletter that it publishes. The sample provided is Vol. 1, No. 4 Winter 1986-87, indicating a quarterly mailing schedule and that the program was begun in 1986. The articles in the newsletter are all either by or about Senator Dole. Page one reports on the Iowa Agricultural Summit discussed above. Page two includes a column of quotes by or about Senator Dole on national issues and a column titled "POLLWATCH" which is devoted primarily to comparisons between Senator Dole and other Republican presidential hopefuls. The cost of this newsletter appears to be at least $34,087.00 (the note on the sample provided indicates that $10,000 represents one half of the printing costs. The $10,000 was paid on 1/7/89 with a second payment reported to the same vendor of $24,087 on 1/13/87). The cost of this newsletter is considered to be testing-the-waters. No State allocation is included.

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Finally, though not related to topics discussed above, it was noted that a CA employee, Christopher Cushing, whose address was in Boston, was later employed by the Committee, and two other CA employees became the regional directors for the Western Region (Steve Sego) and the non-New England Eastern Region (Brian Berry). Also, Donald Devine, a consultant who CA paid $3,000 per week in 1986 until mid March (1987), was paid $5,000 per month by the Committee beginning in mid March, 1987.

The Audit staff also learned that Campaign America had committees registered at the state level in both Iowa and New Hampshire. Though both the interim audit report and the request made to CA asked for information on these committees, no information has been provided.

Presented below is a summary of the CA activity which is considered testing-the-waters.

	State Allocable	Non State Allocable
Iowa	$214,291.91	$ 60,883.20
New Hampshire	52,116.19	11,397.16
Newsletter	-0-	34,087.00
Total	$266,408.10	$106,367.36
Grand Total	$372,775.46	

Conclusion

The activities described above for Iowa and New Hampshire demonstrate a substantial effort in these states by CA. The nature of the activity, the types of events, the individuals involved, and the programs undertaken lead the Audit staff to the conclusion that the activity of CA in Iowa and New Hampshire was primarily for the purpose of assisting Senator Dole in deciding whether he should become a candidate for nomination for the Office of President and to further that candidacy.

The Audit staff further concludes that the expenses associated with these efforts should be considered to be contributions in-kind to Dole for President from CA. It is noted, however, that the Audit staff review is based on limited records provided by CA. Therefore, it is not possible to determine whether similar activities may have taken place in other states or

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if additional Iowa and New Hampshire expenses were incurred. A review of the reports does not indicate programs in other states as extensive as those in Iowa and New Hampshire. Finally, the documentation reviewed does not allow an analysis of expenses not relating to a particular state to determine if some portions of CA's general operating expenses should be considered testing-the-waters.

Recommendation #12

The Audit staff recommends that these matters be referred to the Office of General Counsel as excessive in-kind contributions by CA to the Committee. (See also Exhibit E, Allocation of Expenditures to States.)

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EXHIBIT H
ATTACHMENT 1

CAMPAIGN AMERICA - REPORTED RECEIPTS AND DISBURSEMENTS BY YEAR

YEAR	REPORTED RECEIPTS	REPORTED DISBURSEMENTS	CASH AS CALCULATED FROM COLUMNS 1 AND 2
1978	$ 205,096.00	$ 197,395.00	$ 7,701.00
1979	33,905.00	41,522.00	84.00
1980	13,500.00	13,188.00	396.00
1981	-0-	173.00	223.00
1982	285,356.00	251,934.00	33,645.00
1983	846,698.00	269,371.00	610,972.00
1984	426,219.00	585,767.00	451,424.00
1985	417,971.00	390,423.00	478,972.00
1986	2,929,341.00	2,859,148.00	549,165.00
1987	2,417,616.00	2,916,978.00*/	49,803.00
1988	1,363,777.00	1,108,898.00	304,682.00
TOTAL	$8,939,479.00	$8,634,797.00	

*/ Of this amount, $2,088,536.00 was expended between January 1, 1987 and April 30, 1987.

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MEMORANDUM FOR DON DEVINE

FROM: BILL LACY

DATE: AUGUST 8, 1986

SUBJ: IOWA '86 PROJECT

As you know, Iowa is a crucial state for the GOP.

1. Senator Grassley looks o.k., but Governor Branstad is in a fight for his life.

2. Because of the agricultural situation, Iowa has national significance-- heavy GOP losses there would bode ill for realignment and would be a decisive setback for the President's farm policy.

3. Once a solid GOP state, Iowa is turning Democratic. Stopping the slide there in '86 could give us some ideas to apply to slipping GOP midwestern fortunes. To address these concerns, I would like to propose this concept for an Iowa '86 campaign assistance program:

   Purpose: To assist Governor Branstad and other state and local candidates in Iowa by conducting a GO TV program featuring the Majority Leader.

   Background: Midterm turnout is traditionally lower especially when the party in power faces serious economic problems. In 1982, economic circumstances led to large numbers of Republicans voicing their protest by not voting. Similar circumstances exist in Iowa in 1986 because of the farm economy; so it is critical to reach out to low-intensity voters.

   Outline: Republican voters will be called, asked their position on state and local elections, whose endorsement would make them more likely to support the GOP candidates, queried about their attitude on farm policy, and finally, tested on their level of participation.

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Low participation Republicans dissatisfied with farm policies who support the state and local GOP ticket will then be called. A message from Senator Dole urging them to turn out will be delivered. The target group will also receive a letter of endorsement.

In short, we'll use our resources in a carefully targeted way to elect more Republicans in Iowa.

Let me know what you think.

C30409554381

PROPOSAL FOR
MR. TOM SYNHORST

August 19, 1986

Objectives

1. To contact approximately 228,000 Iowans and determine whether the endorsement of each of seven prominent individuals is more or less likely to influence their supporting the Governor in the November election.

2. To record each person's attitude to the above mentioned questions and store this information for future telemarketing based on their response. Those showing a favorable response to a particular individual's endorsement will be recontacted within the final few weeks before the election.

3. To cost effectively provide high quality and accurate survey data that can be utilized throughout the project at the client's discretion.

4. A manual system of filing will be used as a back-up to the client's automated system.

5. The project will require a total of nine weeks to complete. the final two weeks before the election will be utilized to contact the people who responded favorably to a particular endorsement.

6. Lewis & Associates will have input and control over design and layout of the telemarketing cards, as well as other variables affecting efficiency and performance.

Assumptions

The following assumptions are based on several years of experience in similar types of projects. Each figure is conservative and realistic: Lewis & Associates expects to exceed these figures through improvement of performance variables we can control. These assumptions will provide an excellent measure of the maximum time and cost involved to complete this project.

1. Approximately 15 contacts will be completed per telemarketing hour.

2. Approximately 17.5% of the people surveyed will need to be called back shortly before the election because they responded favorably to a particular endorsement.

3. The survey data will be entered into the master file by the client to enable those people who responded a particular way to be sorted, counted and later re-printed on cards for follow-up calls.

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Estimated Costs

The following estimates of the project's cost are based on the assumptions mentioned before. This estimate reflects the maximum cost per contact the client can incur on this project. If Lewis & Associates completes the project in less than the estimated hours, the client will only be charged for actual telemarketing hours rather than the estimated.

228,000	Original contacts
x 17.5%	Favorabe response rate
39,900	Estimated follow-up contact required
228,000	Original contacts
+39,900	Follow-up contacts
267,900	Total estimated contacts required
+ 15	Contacts per hour
17,860	Telemarketing hours
x 27.50	Cost per telemarketing hour
$491,150	Total estimated cost
$ 27.50	Cost per telemarketing hour
+ 15	Contacts per telemarketing hour
$ 1.83	Cost per contact

Schedule

August 25-29	Make final preparations for project
September 1	(Week #1) Begin project
September 8	(Week #2)
September 15	(Week #3)
September 22	(Week #4)
September 29	(Week #5)
October 6	(Week #6)
October 13	(Week #7)
October 20	(Week #8) Begin calling favorable responses
October 27	(Week #9) Complete calling favorable responses
November 3	(Week #10) Project completed
November 4	Election Day

The calling hours of the project will be 9:00 a.m. to 9:00 p.m. Monday through Sunday.

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IOWA '86 PROGRAM ID SCRIPT

HELLO. MY NAME IS _____ AND I AM CALLING FROM CAMPAIGN AMERICA, A POLITICAL ACTION COMMITTEE. CAN YOU HEAR ME ALRIGHT?

1. WILL YOU BE SUPPORTING THE REPUBLICAN CANDIDATE FOR GOVERNOR, TERRY BRANSTAD, AND HIS STATE-WIDE TICKET?

_____ YES
_____ NO
_____ UNDECIDED

2. WILL YOU BE SUPPORTING _____, YOUR LOCAL REPUBLICAN CANDIDATE FOR THE LEGISLATURE?

_____ YES
_____ NO
_____ UNDECIDED

3. OF THE FOLLOWING LIST OF LEADERS, WHO'S ENDORSEMENT WOULD MAKE YOU MORE LIKELY TO VOTE FOR A CANDIDATE ON NOVEMBER 4TH?

_____ HOWARD BAKER
_____ GEORGE BUSH
_____ BOB DOLE
_____ JESSE HELMS
_____ JACK KEMP
_____ PAUL LAXALT
_____ BOB PACKWOOD
_____ PAT ROBERTSON

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IOWA '86 PROGRAM ID SCRIPT
PAGE TWO

4. WHICH OF THESE LEADER'S ENDORSEMENT WOULD HAVE THE NEXT MOST IMPACT ON YOUR DECISION TO VOTE NOVEMBER 4TH?

_____ HOWARD BAKER
_____ GEORGE BUSH
_____ BOB DOLE
_____ JESSE HELMS
_____ JACK KEMP
_____ PAUL LAXALT
_____ BOB PACKWOOD
_____ PAT ROBERTSON

5. ON AN IMPORTANT MATTER AFFECTING IOWA, DO YOU APPROVE OR DISAPPROVE OF THE JOB THE REAGAN ADMINISTRATION IS DOING ON FARM POLICY?

_____ APPROVE
_____ DISAPPROVE
_____ NO OPINION

IS THAT STRONGLY OR SOMEWHAT (APPROVE)(DISAPPROVE)?

6. FINALLY, I WOULD LIKE TO ASK YOU WHICH OF THESE ACTIVITIES YOU PARTICIPATE IN:

_____ GENERAL ELECTIONS
_____ REPUBLICAN PRIMARIES
_____ PRESIDENTIAL CAUCUSES
_____ YOUR COUNTY'S REPUBLICAN CONVENTION
_____ CONTRIBUTIONS TO REPUBLICAN CANDIDATES
_____ VOLUNTEER FOR CANDIDATES

THANK YOU FOR YOUR TIME.

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Telemarketing
Lewis & Associates Telemarketing, Inc.
2611 Ingersoll Avenue Des Moines, Iowa 50312 (515) 244-4708

Ha project

MARKETING RESEARCH PROJECT

DATE: 10/31/86

CODE	CATEGORY	TOTAL	% OF COMPLETED CONTACTS	% OF COMPLETED SURVEYS
100	COMPLETED SURVEYS			
110	B.D. RESPONDERS (Question #3)			
120	B.D. RESPONDERS (Question #4)			
	Total Complete Surveys			
200	NOT INTERESTED			
300	DISC #/ WRONG #			
	Total Completed Contacts			

ACCUMULATED TOTAL AS OF: 10/31/86

CODE	CATEGORY	TOTAL	% OF COMPLETED CONTACTS	% OF COMPLETED SURVEYS
100	COMPLETED SURVEYS	33,914	50.4	64
110	B.D. RESPONDERS (Question #3)	8,509	12.7	16.1
120	B.D. RESPONDERS (Question #4)	10,589	15.7	20
	Total Completed Surveys	53,012	78.8	
200	NOT INTERESTED	10,449	15.5	
300	DISC #/ WRONG #	3,797	5.6	
	Total Completed Contacts	67,258		

19,098

Households
'86 primary voters 86.2%

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Attachment 6
Page 1 of 1

IOWA SURVEY TOTALS:

SURVEY CARDS:	29,021	
GOVERNOR:		
REPUBLICAN:	19,537	68.1%
DEMOCRAT:	2,135	7.4%
UNDECIDED:	6,998	24.4%
TOTAL RESPONSES:	28,670	
LEGISLATURE:		
REPUBLICAN:	19,735	84.3%
DEMOCRAT:	1,835	7.8%
UNDECIDED:	1,835	7.8%
TOTAL RESPONSES:	23,405	

PRESIDENT, 1ST:			2ND CHOICE			
			BUSH	DOLE	KEMP	ROBERTSON
BAKER:	1,544	10.6%	42.3%	44.1%	10.4%	3.2%
BUSH:	6,279	42.9%	1.9%	79.0%	11.2%	7.9%
DOLE:	5,036	34.4%	76.3%	1.0%	17.4%	5.3%
HAIG:	168	1.1%	23.9%	33.8%	22.5%	19.7%
KEMP:	660	4.5%	40.4%	45.5%	1.3%	12.8%
LAXALT:	100	0.7%	28.6%	32.1%	35.7%	3.6%
PACKWOOD:	95	0.6%	16.5%	57.0%	16.5%	10.1%
ROBERTSON:	742	5.1%	44.0%	30.7%	23.5%	1.8%
TOTAL RESPONSES:	14,624					

PRESIDENT, 2ND:		
BUSH:	5,622	39.8%
DOLE:	5,844	41.4%
KEMP:	1,739	12.3%
ROBERTSON:	905	6.4%
TOTAL RESPONSES:	14,110	

FARM:		
APPROVE:	7,955	28.7%
DISAPPROVE:	8,569	30.9%
UNDECIDED:	11,226	40.5%
TOTAL RESPONSES:	27,750	

POLITICAL:		
PC:	6,148	17.9%
CC:	14,569	42.5%
DC:	6,591	19.5%
VC:	6,861	20.0%
TOTAL RESPONSES:	34,269	

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Approved

October 22, 1986

Dear Fellow Republican:

I am writing you today on a matter of urgent importance to Iowa.

Governor Terry Branstad needs your vote on Tuesday, November 4.

It is especially important that you and your family vote this election day. Many choose not to vote in midterm elections. This must not happen this critical year.

This makes your vote--and the vote of every member of your family--very critical.

Let me explain why. Governor Terry Branstad has been a tremendous ally of mine in the battle to make America's farmers competative again. He's providing leadership to solve the problems of rural and small town America.

As the Senator of a midwestern agricultural state, I know firsthand of the struggles family farmers have faced in the last few years. Not all politicians have understood.

But Terry Branstad has. He's led the charge to improve your agricultural situation in Iowa and in the nation as well. As Senate Majority Leader, I have consulted with him on farm matters on more than one occasion.

The Governor is an effective voice for Iowa here in Washington, on agriculture and other issues. And that's important.

But I've also watched his efficient management of your state government--saving you, the taxpayer, millions of dollars. And he's worked to bring more jobs to Iowa.

Under the Governor's leadership, I see a bright future ahead for Iowa. Please make sure we don't lose that opportunity. Be sure to vote.

But don't stop there. Be sure to vote for the GOP ticket: [list statewide candidates]. And don't forget the Republican candidates for the State Senate and House. They'll be a crucial part of the Governor's efforts to get Iowa back on the right track.

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Believe me, as Majority Leader of the United States Senate, I recognize the need for a team. Make sure the Governor can continue his efforts with a strong team backing him up.

Please vote for Terry Branstad on November 4, and for his team. It's so very important for Iowa.

Sincerely,

BOB DOLE

P.S. Your vote can make the difference. Be sure to get out and vote for Governor Branstad and his ticket on election day.

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DOLE FOR PRESIDENT
Review of Campaign America Records -
Telemarketing

Payee	Check #	Check Date	Iowa Allocable Amount	Other Expenses
Levis & Associates				
Telemarketing Inc.	2945	10/14/86	$ 19,305.00	
	3265	11/03/86	42,120.00	
	3476	12/02/86	9,195.90	
	3310	11/06/86	238.75	
Total			$ 70,859.65	
Ed Nichols Associates	3534	12/09/86	2,635.73	
	3533	12/09/86	2,656.14	
	3797	01/21/87	2,718.80	
	3949	02/13/87	238.75	
	4069	02/26/87	147.00	
	4099	03/02/87	593.85	
Total			$8,990.27	
Follow-Up Letter				
Tom Synhorst (Postage)	3132	10/28/86	5,950.00	
U.S. Postmaster Des Moines	3086	10/23/86	1,300.00	
MacDonald Letter Service	3123	10/27/86	2,683.52	
ABC Mail Service	3122	10/27/86	1,015.00	
ABC Mail Service	4146	03/11/86	143.46	
Follow-Up Letter Total			$11,091.98	
Telemarketing Program Total			$90,941.90	

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SENATOR BOB DOLE

ADDRESS TO THE IOWA BANKERS ASSOCIATION

FEBRUARY 7, 1987

I APPRECIATE THE OPPORTUNITY TO ADDRESS THE ANNUAL LUNCHEON OF THE IOWA BANKERS ASSOCIATION. [SIOUX CITY IS ONE OF MY FAVORITE PLACES. IN FACT, LATELY, ANY PLACE IN OR NEAR IOWA IS ONE OF MY FAVORITE PLACES.] (BRACKETS ADDED)

AS MANY OF YOU KNOW, I HAVE SPOKEN TO MANY IOWANS DURING THE PAST FEW MONTHS. IT'S VERY EVIDENT THAT IOWANS HAVE THE SAME INTERESTS AND CONCERNS AS PEOPLE IN MY HOME STATE OF KANSAS -- THEY WANT TO KNOW HOW TO SURVIVE IN SOME TOUGH ECONOMIC TIMES. THEY WANT A PROSPEROUS NATIONAL ECONOMY, BUT THEY'RE ALSO CONCERNED ABOUT THE ECONOMIC WELL-BEING OF RURAL AMERICA.

SO I WILL BEGIN BY CONGRATULATING EACH OF YOU, BECAUSE AS THE COMMERCIAL LENDERS TO THE FARMERS AND SMALL-TOWN BUSINESSMEN AND WOMEN OF IOWA, YOU PLAY A CENTRAL ROLE IN KEEPING THE WHEELS OF IOWA'S ECONOMY TURNING. IT'S NOT AN EASY JOB, BUT IT IS A PARTNERSHIP THAT HAS ENDURED FOR MANY, MANY YEARS THROUGH THE BAD TIMES AS WELL AS THE GOOD.

A GRASS ROOTS APPROACH

I AM FIRMLY CONVINCED THAT IF WE ARE GOING TO SOLVE THE PROBLEMS FACING RURAL IOWA, RURAL NEBRASKA, RURAL KANSAS OR ANYWHERE ELSE IN RURAL AMERICA, THE ANSWERS ARE GOING TO HAVE TO COME FROM THE GRASS ROOTS AND NOT FROM POLITICIANS IN WASHINGTON D.C.

IN NOVEMBER, GOVERNOR BRANSTAD AND I ORGANIZED THE "REPUBLICAN TASK FORCE ON FARM AND RURAL AMERICA" WITH THE FIRST MEETING IN DES MOINES, IOWA, COMPOSED OF MIDWEST GOVERNORS, SENATORS AND CONGRESSMEN. WITH SEVERAL NEWLY-ELECTED MIDWESTERN GOVERNORS, WE FELT THAT REPUBLICANS HAD AN OPPORTUNITY AND A RESPONSIBILITY TO DEVELOP A CLOSER STATE AND NATIONAL RELATIONSHIP ON FOUR ISSUES IMPORTANT TO RURAL CITIZENS, ESPECIALLY IN THE MIDWEST: FARM POLICY, RURAL DEVELOPMENT, FARM CREDIT AND AGRICULTURAL TRADE AND EXPORTS.

IN ADDITION TO GOVERNOR BRANSTAD, SEVERAL MEMBERS OF THE IOWA DELEGATION WERE PRESENT: REPRESENTATIVES JAMES LEACH, JIM LIGHTFOOT, TOM TAUKE AND FRED GRANDY.

RURAL DEVELOPMENT

AFTER HOLDING MEETINGS IN DES MOINES AND CHICAGO, IT WAS THE TASK FORCE'S CONSENSUS THAT, WHILE THE FARM PROGRAM IS UNDOUBTEDLY A KEY FACTOR IN THE OVERALL RURAL ECONOMY, IT WILL

TAKE MORE THAN CHANGES IN BASIC FARM LEGISLATION TO TURN THINGS AROUND. WE HAVE EXPERIENCED THE EMOTIONAL ROLLER-COASTER OF HOPES AND DISAPPOINTMENTS WHEN WASHINGTON CONSIDERS NEW FARM BILLS. WHILE SOME IMPROVEMENTS ARE MADE, THEY ARE OFTEN TOOBROAD-BASED TO ADDRESS AND RESOLVE LOCAL PROBLEMS. MANY RURAL COMMUNITIES AND BUSINESSES ARE IN CRITICAL DANGER OF COLLAPSE NOW, AND WE NEED TO FOCUS ON WHAT CAN BE DONE THROUGH RURAL DEVELOPMENT PROGRAMS TO SUPPLEMENT WHAT WE DO WITH FARM PROGRAMS.

IN PARTICULAR, WE NEED TO FIND WAYS TO DIVERSIFY THE ECONOMIES OF FARM COMMUNITIES AND PROVIDE EDUCATION AND VOCATIONAL TRAINING OPPORTUNITIES FOR FARMERS AND OTHER RURAL CITIZENS. A NUMBER OF FARM STATES HAVE ALREADY DONE IMPORTANT WORK IN THESE AREAS. WE NEED TO BEGIN TO COORDINATE EFFORTS AT THE FEDERAL LEVEL WITH THE STATES AND PRIVATE ENTERPRISE AND MAKE SURE OUR BASIC COMMODITY PROGRAMS DOVETAIL WITH THESE BROADER INITIATIVES.

WE HAVE ALREADY STARTED IN THE SENATE ON SOME OF THESE ISSUES. DURING CONSIDERATION OF THE FEDERAL HIGHWAY BILL ON FEBRUARY 4, WE ADOPTED AN AMENDMENT BY SENATOR PRESSLER STATING THE FEDERAL GOVERNMENT MUST DO MORE TO ADDRESS THE SERIOUS PROBLEM OF DETERIORATING BUS SERVICE FOR RURAL AMERICA. WE MUST KEEP BASIC SERVICES IN RURAL AMERICA TO ATTRACT NEW BUSINESSES AND PROVIDE NEW JOBS AND GREATER ECONOMIC ACTIVITY.

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RE-TRAINING FOR DISPLACED RURAL AMERICANS

I AM GOING TO MAKE A RECOMMENDATION REGARDING JOB RETRAINING PROVISIONS IN ANY NEW TRADE LEGISLATION CONSIDERED BY THE 100TH CONGRESS. THE ADMINISTRATION'S TRADE BILL CONTAINS NEARLY $1 BILLION IN RE-TRAINING ASSISTANCE FOR WORKERS WHO HAVE LOST THEIR JOBS DUE TO INCREASED IMPORTS. CURRENTLY, 25 PERCENT OF ALL AMERICANS LIVE IN RURAL COMMUNITIES -- COMMUNITIES THAT FACE DIFFICULT ECONOMIC TIMES DUE TO A NUMBER OF FACTORS, INCLUDING A SIGNIFICANT DECLINE IN AGRICULTURAL EXPORTS AND A RISE IN AGRICULTURAL IMPORTS.

I MAY OFFER AN AMENDMENT DURING THIS YEAR'S TRADE DEBATE EARMARKING NOT LESS THAN 25 PERCENT OF ANY JOB RETRAINING FUNDS FOR WORKERS IN RURAL COMMUNITIES -- ALL THE WAY FROM FARMERS TO HARDWARE STORE WORKERS THAT HAVE BEEN AFFECTED BY THE AGRICULTURAL ECONOMY. ITS MY VIEW THAT IF 25 PERCENT OF ALL AMERICANS LIVE IN RURAL AREAS THEY OUGHT TO GET AT LEAST 25 PERCENT OF THE JOB RETRAINING ASSISTANCE.

FARM PROGRAMS

ANOTHER CONCERN OUR REPUBLICAN TASK FORCE ADDRESSED IS FARM CREDIT. PERSONALLY, I THINK MOST BANKERS WOULD SAY THEIR TWO GREATEST FEARS WOULD BE (1) A SHARP REDUCTION IN COMMODITY PROGRAM BENEFITS AND (2) THE COLLAPSE OF THE FARM CREDIT SYSTEM. THESE EVENTS COULD RESULT IN LOWER FARMLAND VALUES AND EXACERBATE THE FARM DEBT PROBLEM.

THE ADMINISTRATION HAS NOTIFIED CONGRESS THAT IT WANTS TO CHANGE THE 1985 FARM BILL. ONE PART OF THEIR LEGISLATIVE PACKAGE WOULD CUT TARGET PRICES BY TEN PERCENT PER YEAR FOR THREE YEARS. THIS WOULD REDUCE SPENDING ON FARM PROGRAMS BY ABOUT $20 BILLION DURING FISCAL YEARS 1988-1992.

MY VIEW IS THAT OUR EFFORTS TO ADDRESS THE FEDERAL BUDGET DEFICITS MAY WELL REQUIRE SOME REDUCTIONS IN SPENDING FOR AGRICULTURAL PROGRAMS. WE ARE ALL FAMILIAR WITH THE FACT THAT FARM PROGRAM COSTS HAVE RISEN FROM AN ANNUAL AVERAGE OF $3-$4 BILLION IN THE LATE 1970'S TO $25.8 BILLION LAST YEAR AND AN ESTIMATED $25.2 BILLION IN FY-1987.

CONGRESS AND THE ADMINISTRATION SHOULD KEEP IN MIND, HOWEVER, THAT, TAKING INFLATION INTO ACCOUNT, THE FARM VALUE OF FOOD ACTUALLY FELL DURING THE PAST DECADE, AND THAT AMERICANS NOW USE ABOUT ONE-THIRD LESS OF THEIR DISPOSABLE INCOME FOR FOOD PURCHASES - SO FARMERS MAY BE RECEIVING MORE OF THEIR INCOME FROM THE GOVERNMENT, BUT THE REAL BENEFICIARIES ARE PEOPLE WHO EAT.

SO, I DON'T BELIEVE CONGRESS WILL APPROVE THE ADMINISTRATION'S TARGET PRICE CUTS -- OR ANY MAJOR FARM PROGRAM CHANGES UNLESS AND UNTIL WE SEE MEANINGFUL AND EQUITABLE ACTION ON BUDGET DEFICITS.

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FARM CREDIT

WE ALSO WANT TO ENSURE THAT AN ADEQUATE SUPPLY OF CREDIT AT REASONABLE RATES IS AVAILABLE TO FARMERS AND RURAL ENTERPRISES. THIS MEANS MAINTAINING THE VIABILITY OF THE COOPERATIVE FARM CREDIT SYSTEM. BUT IT ALSO MEANS THAT OUR EFFORTS TO ASSIST STRUGGLING FARMERS AND THE FARM CREDIT SYSTEM MUST NOT DRIVE COMMERCIAL LENDERS OUT OF THE FARM LOAN BUSINESS.

CHAPTER 12

I HAVE HEARD FROM A NUMBER OF FARM BANKERS IN MY STATE WHO HAVE CONCERNS ABOUT THE NEW CHAPTER 12 LEGISLATION, SPONSORED BY IOWA'S SENIOR SENATOR, CHUCK GRASSLEY. THEY PARTICULARLY QUESTION THE "ADEQUATE PROTECTION" PROVISIONS, WHICH ALLOW A DEBTOR TO STAY IN BUSINESS BY WRITING DOWN FARMLAND DEBT TO ITS CURRENT VALUE.

TO DATE THERE HAS BEEN NO RUSH TO THE BANKRUPTCY COURTS SINCE ENACTMENT OF CHAPTER 12. AS OF JANUARY 22, THERE WERE ONLY 357 FILINGS IN THE 8TH CIRCUIT, WHICH INCLUDES IOWA AND SIX OTHER KEY FARM STATES. THE LIMITED USE OF THE NEW CHAPTER 12 APPEARS TO BE THE NEW TAX REFORM BILL, WHICH ENCOURAGES FARMERS WITH SERIOUS FINANCIAL PROBLEMS TO WRITE DOWN LOSSES INSTEAD OF FILING FOR BANKRUPTCY.

I SUGGEST WE SHOULD GIVE SENATOR GRASSLEY'S LEGISLATION A FAIR CHANCE TO WORK. CONGRESS WILL BE WATCHING CLOSELY TO SEE WHAT THE REPERCUSSIONS ON FARM LENDING WILL BE. IF SIGNIFICANT PROBLEMS ARISE AND CREDIT THREATENS TO DRY UP, WE ARE PREPARED TO MAKE THE NECESSARY CORRECTIONS.

SECONDARY MARKET

I UNDERSTAND A TASK FORCE HAS BEEN MEETING ON THE SO-CALLED "SECONDARY MARKET" CONCEPT COMPOSED OF THE FARM CREDIT SYSTEM, THE INDEPENDENT BANKERS, THE AMERICAN BANKERS AND INSURANCE COMPANY REPRESENTATIVES. SENATOR GRASSLEY HAS INTRODUCED LEGISLATION TO CREATE A SECONDARY MARKET AS A MEANS OF INCREASING THE AVAILABILITY OF FUNDS FOR FARM LENDING.

THE IDEA OF PACKAGING LONG-TERM FARM LOANS AND MARKETING THEM THROUGH AN ENTITY THAT HAS AGENCY STATUS AND ACCESS TO THE BOND MARKETS -- EITHER THROUGH THE FARM CREDIT SYSTEM OR THROUGH A "FARMER MAC" OR AN "AGGIE MAE" -- IS AN INTRIQUING IDEA THAT DESERVES CLOSE EXAMINATION, ESPECIALLY IF IT COULD BRING MORE CAPITAL TO RURAL COMMUNITIES AND COULD OFFER FARMERS LOWER INTEREST RATES ON REAL ESTATE LOANS.

I THINK THERE SHOULD BE A FULL DISCUSSION OF THIS CONCEPT AND HOW IT MAY BE PART OF OUR OVERALL APPROACH TO THE FARM CREDIT SITUATION THIS YEAR. I ENCOURAGE COMMERCIAL LENDERS TO WORK WITH THE FARM CREDIT SYSTEM AND OTHERS AND CONTINUE TO EXPLORE WHAT MAY PROVE TO BE A VERY USEFUL LENDING TOOL.

0040955497

PROPOSED COMMITTEE HEARINGS

RECENTLY THERE HAVE BEEN QUITE A FEW PRESS REPORTS CONCERNING THE FINANCIAL CONDITION OF THE FARM CREDIT SYSTEM. CONGRESS HAS COME TO THE AID OF THE SYSTEM TWICE WITHIN THE LAST 18 MONTHS, PASSING LEGISLATION TO PROVIDE BASIC GUIDELINES FOR REFORMS AND GIVING THE SYSTEM AND ITS BORROWERS MORE FLEXIBILITY IN DEALING WITH THEIR PROBLEMS. THERE ARE MANY WHO SAY THE SYSTEM WILL NEED SOME FEDERAL FINANCIAL ASSISTANCE SOMETIME THIS YEAR UNDER THE 1985 CREDIT ACT. THERE ARE MANY WHO FEEL THE SYSTEM COULD BE MORE CANDID ABOUT THE EXTENT OF ITS DIFFICULTIES AND THE TIMELINESS OF INITIATING A NEW DEBATE ON FURTHER REFORMS AND RESTRUCTURING.

I HAVE WRITTEN SENATOR LEAHY AND SENATOR LUGAR ASKING THE SENATE AGRICULTURE COMMITTEE TO CONDUCT A FULL DAY OF HEARINGS TO INVESTIGATE THE FINANCIAL STATUS OF THE FARM CREDIT SYSTEM AS WELL AS OTHER AGRICULTURAL LENDERS. SUCH A HEARING WOULD PROVIDE AN OPPORTUNITY TO RECEIVE RECOMMENDATIONS FROM THE FARM CREDIT ADMINISTRATION, THE FARM CREDIT SYSTEM AND FROM COMMERCIAL AGRICULTURAL LENDERS REGARDING MEASURES THAT MAY BE NECESSARY TO ENSURE OUR FARMERS HAVE ACCESS TO AN ADEQUATE SUPPLY OF CREDIT AT REASONABLE RATES.

I DON'T WANT TO BE CAUGHT WITH EVERYONE COMING TO CONGRESS AND SAYING THAT THE SYSTEM NEEDS ASSISTANCE WITHIN A WEEK. THIS IS AN ISSUE THAT DOES NOT NEED TO SURPRISE ANY OF US, SO WHY NOT START NOW TO THINK ABOUT THE VIRTUES AND DRAWBACKS OF ANY ALTERNATIVES TO HELP THE SYSTEM THROUGH TOUGH TIMES. CONGRESS IS

GETTING TIRED OF PASSING LEGISLATION THAT EVERYONE SAYS WILL "SAVE THE FARM CREDIT SYSTEM" -- ONLY TO FIND OUT THREE MONTHS LATER THAT THE PROBLEM STILL EXISTS.

CONCLUSION

NOT LONG AGO, I SPOKE TO YOUR STATE SHERIFFS' ASSOCIATION ABOUT SOME OF THE ISSUES IMPORTANT TO THEIR MEMBERS AND TO IOWA. AGRICULTURE WAS AT THE TOP OF THE LIST.

THERE PROBABLY WASN'T A SHERIFF IN THE ROOM WHO HAD NOT FELT THE EFFECTS OF THE DEPRESSED FARM ECONOMY. AND THE EFFECTS ARE VERY REAL, FOR IT IS THE SHERIFF OR A DEPUTY SHERIFF WHO TAKES THAT LONG DRIVE UP A FARMER'S LANE TO DELIVER A FORECLOSURE OR EVICTION NOTICE.

LIKE THOSE SHERIFFS, YOU ALSO KNOW THE PROBLEMS OUR RURAL ECONOMY FACES. AND I DOUBT THERE IS A PERSON IN THIS ROOM WHO HASN'T FELT THE PAIN OF TURNING DOWN A FARMER - PERHAPS A NEIGHBOR OR A FRIEND YOU'VE KNOWN FOR YEARS - WHO WAS LOOKING FOR A LITTLE BREATHING ROOM, A SECOND CHANCE, A NEW HOPE FOR THE FUTURE.

4095549

BUT WHEN FARMERS ARE IN TROUBLE, YOUR BUSINESS - THE BUSINESS OF BANKING - IS ALSO IN TROUBLE. 1986 SAW RECORD LOSSES FOR IOWA BANKS, ATTRIBUTABLE IN LARGE PART TO THE STATE'S DEPENDENCY ON AN AGRICULTURE-BASED ECONOMY. BUT THERE MAY BE SOME GOOD NEWS AROUND THE CORNER.

I KNOW THAT YOUR STATE BANKING COMMISSIONER IS PREDICTING FEWER BANK CLOSURES IN IOWA THIS YEAR. AND IN WASHINGTON, WE'RE LOOKING FOR BETTER WAYS TO HELP BOTH THE FARMER AND THE BANKER.

NOW SOME WOULD SAY THAT WE IN WASHINGTON MUST PROVIDE ALL THE SOLUTIONS. AND WE OFTEN TRY. BUT, AS I'VE SAID MANY TIMES BEFORE, WE IN CONGRESS CANNOT GUARANTEE THAT EVERYONE IN OUR SOCIETY SUCCEEDS. ALL WE CAN DO IS STRIVE TO PROVIDE THE RIGHT KIND OF ENVIRONMENT WHERE PEOPLE HAVE THE OPPORTUNITY TO SUCCEED - BUT WE CANNOT GUARANTEE SUCCESS.

BUT IF WE WORK TOGETHER, PERHAPS WE CAN MAKE 1987 A BEGINNING FOR MORE SUCCESSFUL TIMES IN AGRICULTURE. I LOOK FORWARD TO WORKING WITH YOU.

2304095500

BEVERLY HUBBLE TAUKE

400 "O" Street S.W. #203
Washington D.C. 20024
(202) 484-7134

TO: SENATOR DOLE

FEBRUARY 18, 1987

FROM: BHT

RE: IOWA TALKING POINTS

QUAD CITIES ISSUES

* **CATERPILLAR PLANT CLOSING:** As confirmed in February 17 announcement, wipes out 1,300 jobs despite plant's track record as most productive CAT plant in USA; its demise due to LOSS OF FOREIGN MARKETS. Plant will phase out during late 1987, 1988.

(TIE TO DOLE TRADE AGENDA TO PROTECT IOWA AND U.S. JOBS... As proven by Dole battles against unfair Canadian pork imports and unfair ethanol imports <mostly Brazil>, Bob Dole is committed to enforce U.S. trade laws, and demand free but FAIR TRADE.

ALSO USEFUL HERE: Other Dole initiatives re: strong dollar, aggressive pursuit of international markets, erosion of federal red tape/barriers to strong trade.)

* **MISSISSIPPI RIVER PROJECT:** Officials in area are pushing number of proposed projects (but not in total agreement) including:

* Possible use of old Case building outside Davenport as a museum or tourist center, enhancing river area appeal to tourists.

* Bi-State commission urging construction of new bridge--old one viewed as severely inadequate link between Iowa-Illinois.

* Riverboat gambling to attract more business.

* New levies - could include federal funds if cities match funding.

* River seen as centerpiece of long-range (20-year) development plan promoted by local media to unite Quad Cities more as single community; would include removal of commercial properties along river.

* These proposals have not really moved past promotion stage.

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IOWA TALKING POINTS

SUPPORT FOR IOWA FARMERS

* **UNFAIR CANADIAN PORK IMPORTS:** Dole/Grassley initiative led to PUNITIVE DUTIES for Canadians dumping pork unfairly on U.S., with enormous stakes for Iowa.

* **UNFAIR ETHANOL IMPORTS:** Dole battles vs. unfair ethanol imports, severely jeopardizing corngrowers & corn-based ethanol industry, at great risk to Iowa. Such battles have stymied ethanol imports, saving U.S. ag economy about $900 million in late '85 - early '86 alone, according to ethanol industry.

* **BILL TO ADVANCE SPRING PAYMENTS,** Dole-backed, would mean 725m - 750 million early dollars to Iowa farmers.

* **SOIL TILTH CENTER, IOWA STATE UNIVERSITY** - Dole, supporting C.Grassley, engineered restoration of **$11.1 MILLION** to ISU for research crucial in battle for U.S. agriculture to compete effectively in global markets. Study of new growth options, new uses of U.S. food and fiber....to sustain the 7 out of 10 Iowa jobs now dependent on agriculture.

* **1985 FARM BILL:** Suggest keeping this tight with few key points:

(1) No bill would please all farmers.

(2) Under REPUBLICAN-SHAPED programs of past FIVE YEARS (1982-1986), MORE WAS SPENT ON AGRICULTURE ($104 BILLION estimate as of last Spring) than was spent on agriculture during prior 18 YEARS! If commitment to American farmers is measured by dollars, the fact is that the REPUBLICAN SENATE delivered far greater support to agriculture than previously offered under Democratic control.

(3) Suggest emphasis on achievements of farm program, light acknowledgment of inevitable inadequacies, but no need to use extensive remarks to defend Farm Bill. **Sounds** too defensive.

TAX REFORM

* **WINNING OVERWHELMING BIPARTISAN SUPPORT FROM 97 SENATORS,** Republican-controlled Senate last year led way to most sweeping tax reform in 40 years.

* "I'm sorry our party didn't put it in our 1984 platform," groused Democratic presidential hopeful Gary Hart, "but it got away from us and it's theirs now." (**Washington Post**).

* No wonder Democrats cringed at Republican-led reforms. Through that historic overhaul, Republicans:

o Assured **LOWER RATES** for about 80% of all U.S. taxpayers.

o Eliminated about 6 **MILLION POOR** from the tax rolls.

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o Reduced the top rate of 27% lower than at any time since 1931.

* **INCOME TAX INDEXING**, engineered by Republicans, assured PRIMARY RELIEF TO **WOMEN AND MINORITIES.** (Concentrated relief for low-income taxpayers who move up narrow tax brackets faster.)

TAX REFORM, Cont'd

* **DEMOCRATS MAY WIN THE RHETORIC BATTLE** - but it's REPUBLICANS WHO HAVE DELIVERED TAX RELIEF to the very "workers, women, minorities and poor" for whom Democrats too often claim exclusive concern.

* **NEW CHALLENGE:** TO BEAT BACK INEVITABLE DEMOCRATIC ATTEMPTS TO STRIP AWAY THOSE HARD-WON TAX BREAKS! Democrat-controlled House has already rejected efforts to protect tax relief from early erosion. **DOLE RESOLUTION** seeks to put Senators on record **AGAINST ANY INCOME TAX INCREASE THIS YEAR.** American workers won substantial tax relief under the DOLE WATCH, and I'm now making TAX RELIEF PRESERVATION a top priority on the Republican agenda.

BALANCED BUDGET

* **IN MY (DOLE) CRUSADE FOR BALANCED BUDGET AMENDMENT**, I've traveled to Michigan & elsewhere to lobby legislators.... 32 states have adopted resolutions urging constitutional amendment limiting taxes and requiring a balanced federal budget. **I'M COMMITTED TO A BALANCED BUDGET AMENDMENT.**

* **SENATE BUDGET VOTE IN 1985 TO ELIMINATE 13 FEDERAL PROGRAMS**, & restrict spending in hundreds of other programs was a major victory towards budget restraint....FOILED ONLY WHEN THE HOUSE BALKED!

* **GRAMM-RUDMAN** has been useful in moving U.S. towards budget control But a statute can be modified, postponed, or amended by a simple majority...which is why we need the Constitutional amendment to force Congress to fiscal responsibility.

WOMEN'S ISSUES

* **PENSION REFORM:** Dole-backed legislation gave YOUNG WOMEN the right to qualify earlier for pension programs, and guaranteed OLDER WOMEN a share of their spouse's retirement income. (Because highest percentage of women work during early twenties, exclusion of those workers from pension accrual proved a greater liability to female than male workers).

* **CHILD SUPPORT ENFORCEMENT:** Dole-backed legislation now allows state and federal governments to WITHHOLD TAX REFUNDS from parents (most often fathers) delinquent on child support payments. Such child-support enforcement crucial to relieve enormous economic pressure often confronting women who head households.

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* **DISCRIMINATORY LAWS:** A Dole proposal would not allow federal funds for enforcement of laws with gender-based distinctions.

MINORITY RIGHTS

* **VOTING RIGHTS ACT:** (Briefly explain stakes for black voters in some U.S. communities)... Dole led Republican support WITHOUT WHICH minority voters in some U.S. communities would have LOST legal protection essential to guarantee their basic Constitutional rights.

MINORITY RIGHTS, Cont'd

* **MARTIN LUTHER KING HOLIDAY:** Floor leader to navigate legislation through Senate. Message to black Americans: The Party of Abraham Lincoln REMAINS home of MANY OF US deeply committed to full freedom, rights, of all Americans. (Note: Despite Iowa's minuscule minority population, Iowans of all stripes are generally supportive or at least not antagonistic to this type social issue.)

NOTE: GENERAL OBJECTIVES OF IOWA TALKING POINTS

* **ADDRESS VALUES IMPORTANT TO IOWANS:** Initiatives on agricultural generally, pork/corn specifically, tie RJD to Iowa's best interests far more tightly than possible with any other Republican hopeful, possibly than any Democrat.

* **OFFER IOWANS A FRIEND IN THE WHITE HOUSE:** If candidates are confronted with question: How should your PAST commitments assure Iowans that if you are elected Iowa will have a friend in the White House.... It's likely NO ONE could answer that challenge as effectively as RFD. So we should make sure the question is asked...and asked...and asked. (Using past as barometer of future) <Useful in other farm states as well, for that matter....>

(BRACKETS ADDED)

* **DEFINE BOB DOLE WITH ECONOMICALLY CONSERVATIVE AND COMPASSIONATE SUBSTANCE:** A too-rare combination, but VERY APPEALING to Iowans. Stress the balanced-budget, tax control substance without wearing out the "conservative" term; But also stress important Dole battles for women, poor, minorities, handicapped for the conservative-with-a-heart package reflecting Iowa values.

* **WOMEN/MINORITY RIGHTS** included here primarily because those issues were raised in prior Iowa town meetings. Some settings may not warrant such emphases, but the solid DOLE RECORD should be cited when issues raised.

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DOLE FOR PRESIDENT
REVIEW OF CAMPAIGN AMERICA PAC RECORDS
SCHEDULE OF EVENTS AND MEETINGS HELD IN IOWA BETWEEN 3/31/86-2/23/87

(SEE EXPLANATION OF COLUMN HEADINGS ON PAGE 10 of 10

EVENTS:

DESCRIPTION OF EVENT/ DATE OF EVENT/ PAYEE	CHECK # & CHECK DATE	IOWA ALLOCABLE AMT	IOWA TRVL-NON ALLOCABLE	OTHER EXPENSES	MEMO ENTRY EXPS	ATTENDEES @ EVENT
3/31/86-4/01/86 MEETING HELD AT HOTEL DSM						ATTENDEES: SENATOR DOLE TOM SYNHORST M GLASSNER D DEVINE F BROWN T SOUCY-ROCK ISLAND, NEAR DAVENPORT
HOTEL FORT DSM	1898/4-24	140.19				
EXECUTIVE AIR TRAVEL	1892/4-24	1,294.58	5,959.15			
FLOYD BROWN	1805/4-07				254.48	
INTERNATIONAL TOURS ALEXANDRIA	1775/4-01					
FLOYD BROWN	"				290.00	
ROBERT WALLACE	1929/3-31	36.00				
ROBERT WALLACE	1951/3-31	6.00				
TOM SOUCY	1811/4-08	345.64				
SUBTOTALS:		1,822.41	5,959.15		544.48	
4/04/86-4/05/86 EVENTS & MEETINGS THROUGHOUT IOWA						ATTENDEES: SENATOR DOLE FLOYD BROWN JOE BARRETT DONALD DEVINE
EXECUTIVE JET AVIATION	1892/4-24	513.72	4726.23			
INTERNATIONAL TOURS ALEXANDRIA	1884/4-21					
FLOYD BROWN	"				285.00	
JOE BARRETT	1814/4-8	193.38		226.68	168.57	
JOE BARRETT	1703					
INTERNATIONAL TOURS ALEXANDRIA	1775/4-01					
DONALD DEVINE	"		224.00			
SUBTOTALS:		707.10	4,950.23	226.68	453.57	
4/18/86 AN EVENT AT WAPALLO IOWA & A REPUBLICAN DINNER @ DSM 4-24-86						ATTENDEES: F BROWN J REHMAN
IOWA DINING	1856/4-18	1,396.82				
VFW POST 5166	1857/4-18	275.00				
PAT PARSONS	1858/4-18	206.81				
C HICKLIN	1859/4-18	18.59				
R GERST	1860/4-18	284.00				
FLOYD BROWN	1905/4-29				989.37	
JOHN REHMAN	2152/6-16				334.22	
SUBTOTALS:		2,181.22			1,323.59	

DESCRIPTION OF EVENT/ DATE OF EVENT/ PAYEE	CHECK # & CHECK DATE	IOWA ALLOCABLE AMT	IOWA TRVL-NON ALLOCABLE	OTHER EXPENSES	MEMO ENTRY EXPS	ATTENDEES @ EVENT
4-30-86/5-03-86						ATTENDEES:
IOWA CONGRESSIONAL DISTRICT CONVENTIONS						SENATOR DOLE
						PAUL RUSSO
ROBERT VANESSE	1962/5-06	329.78				M GLASSNER
ROBERT VANESSE	1972/5-09	274.04	200.93			W SWEENEY
WARREN SWEENEY	2373/7-25	254.47	4.00	50.67		R VANASSE
HOTEL FORT DSM FOR:	2042/5-27					S SEGO
ROBERT VANESSE	''	726.03				F BROWN
SENATOR DOLE	''	141.65				J BARRETT
PAUL RUSSO	''	116.95				B BERRY
MIKE GLASSNER	''	49.53				
WARREN SWEEENEY	''	38.85				
JOE BARRETT	''	78.20				
STEVE SEGO	''	285.49				
FLOYD BROWN	''				445.90	
JOE BARRETT	1889/4-22	197.36		206.29		
JOE BARRETT	1976/5-09					
BRIAN BERRY	1945/5-05	332.88				
FLOYD BROWN	1984/5-14				675.90	
STEVE SEGO	1938/5-05	61.79				
FLOYD BROWN	2425/8-05				258.94	
TIBBEN FLIGHTS	1978/5-14	1,451.52				
SUBTOTALS:		4,338.54	204.93	256.96	1,380.74	
6/20/86-6/21/86						ATTENDEES:
IOWA GOP CONVENTION						SENATOR DOLE
FLOYD BROWN	2203/6-25				339.14	J VOIGHTS
BRENT BAHLER	2221/6-27	3.20	297.50			F BROWN
HOTEL FORT DSM FOR:	2277/7-03					D DEVINE
JANE VOIGHTS	''				176.06	
MARRIOT HOTEL	2276/7-03	156.00				
FRED DOWIE	2275/7-03	63.34				
CITY OF DES MOINES	2278/7-03	50.00				
ALEXANDERS PHOTO SERVICE	2291/7-07	340.74				
'' ''	2323/7-17	34.32				
CONAGRE, INC	2733/9-18		933.00			
ALEXANDRIA TRAVEL SERVICE FOR:	2191/6-23					
DONALD DEVINE	''		232.00			
INTERNATIONAL TOURS ALEXANDRIA	2261/7-02					
FLOYD BROWN	''				464.00	
SUBTOTALS:		647.60	1,462.50		979.20	

DESCRIPTION OF EVENT/ DATE OF EVENT/ PAYEE	CHECK # & CHECK DATE	IOWA ALLOCABLE AMT	IOWA TRVL-NON ALLOCABLE	OTHER EXPENSES	MEMO ENTRY EXPS	ATTENDEES @ EVENT
7/25/86-7/26/86						ATTENDEES:
5TH DISTRICT REPUBLICAN EVENT -- ATLANTIC IOWA						JOHN REHMAN
						SENATOR DOLE
J REHMAN	3335/11-11				475.18	
SUBTOTALS:			0	0	475.18	
8/03/86-8/04/86						ATTENDEES:
MEETING @ HOTEL DSM						SEN DOLE
						F BROWN
FLOYD BROWN	2506/8-19				65.56	B LACY
HOTEL FORT DSM	2687/8-14				105.14	D DEVINE
HOTEL FORT DSM	2487/8-14					M GLASSNER
HOTEL FORT DSM FOR:	2485/8-14					JANE VOIGHTS
JANE VOIGHTS	"				93.06	
PRATT AUDIO VISUAL	2484/8-14	29.83				
BURLINGTON INDUSTRIES FOR:	2426/8-05		2,315.00			
" "	2377/7-25		453.00			
FLOYD BROWN	2377/7-25				903.00	
SENATOR DOLE	"					
MIKE GLASSNER	"					
ABNOR	"					
PLESSEN	"					
MICKELS	"					
MELISIS	"					
INTERNATIONAL TOURS ALEXANDRIA	2468/8-12					
DONALD DEVINE	"		480.00			
FLOYD BROWN	"				480.00	
BILL LACY	"		480.00			
SUBTOTALS:		29.83	3,728.00		1,646.76	

DESCRIPTION OF EVENT/ DATE OF EVENT/ PAYEE	CHECK # & CHECK DATE	IOWA ALLOCABLE AMT	IOWA TRVL-NON ALLOCABLE	OTHER EXPENSES	MEMO ENTRY EXPS	ATTENDEES @ EVENT
8/22/86-8/23/86 IOWA STATE FAIR						ATTENDEES: SENATOR DOLE F BROWN JOE KELLEY TOM SOUCY M GLASSNER BILLL LACY BEN SCHWARM
FLOYD BROWN	2584/9-02				354.85	
JOE KELLY	2908/10-10	12.28				
JOE KELLY	2603/9-03	91.92	461.00			
JOE KELLY	2634/9-05	137.48				
TOM SOUCY	2776/9-23	94.77	250.00			
TOM SOUCY	2871/10-06	119.53	275.00			
RUAN INC	2732/9-18		2,177.00			
DSM FLYING SERVICE	2541/8-22	791.00				
TIBBEN FLIGHTS	3299/11-05	198.72				
HOTEL DSM FOR:	2814/9-30					
FLOYD BROWN	,,				284.99	
JANE VOIGHTS	,,				72.29	
TOM SAUCY	,,	239.59				
SENATOR DOLE	,,	138.75				
BILL LACY	,,	58.29				
MIKE GLASSNER	,,	50.71				
BILL LACY	2576/8-28		15.00	418.78		
BEN SCHWARM	2635/9-05	236.99	350.00	288.00		
FREEMAN COMPANY	2661/9-10	68.12				
SUBTOTALS:		2,238.15	3,528.00	706.78	712.13	
9/19/86-9/21/86 SENATOR GRASSLEY BIRTHDAY EVENTS						ATTENDESS: SENATOR DOLE J DAVIS J. RAUBER F BROWN
JEFF DAVIS	2842/10-01	291.57	373.00			
J RAUBER, JR	2839/10-01	85.49	489.00			
FLOYD BROWN	2769/9-23				266.94	
MISSISSIPPI CHEMICAL COMPANY	2738/9-18		2,602.84	5,205.66		
INTERNATIONAL TOURS ALEXANDRIA	2833/10-01					
FLOYD BROWN	,,				440.00	
SUBTOTALS:		377.06	3,464.84	5,205.66	706.94	

DESCRIPTION OF EVENT/ DATE OF EVENT/ PAYEE	CHECK # & CHECK DATE	IOWA ALLOCABLE AMT	IOWA TRVL-NON ALLOCABLE	OTHER EXPENSES	MEMO ENTRY EXPS	ATTENDEES @ EVENT
10/21/86-10/22/86 STEERING COMMITTEE MEETING						ATTTENDEES: FLOYD BROWN BILL LACY DON DEVINE CAL HULTMAN JOHN REHMAN
HOTEL FORT DSM FOR:	3370/11-18					
FLOYD BROWN	,,				136.84	
BILL LACY	,,	38.85				
DONALD DEVINE	,,	69.74				
INTERNATIONAL TOURS ALEXANDRIA	3212/10-29					
BILL LACY	,,		530.00			
CAL HULTMAN	3138/10-28				88.99	
JOHN REHMAN	3440/10-28				456.25	
SUBTOTALS:		108.59	530.00		682.08	
10/27/86-10/28/86 DAVENPORT,COUNCIL BLUFF,CEDAR RAPIDS						ATTENDEES: SENATOR DOLE M GLASSNER F BROWN D DEVINE S CEDARHOLM C HULTMAN J VOIGHTS
BLACKHAWK HOTEL FOR:	3272/11-04					
SENATOR DOLE	,,	33.00				
MIKE GLASSNER	,,	36.90				
FLOYD BROWN	,,				47.64	
DONALD DEVINE	,,	59.91				
SARA CEDARHOLM	3352/11-13	173.98				
INTERNATIONAL TOURS ALEXANDRIA	3372/11-18					
SARA CEDARHOLM	,,		145.00			
AMERICAN FINANCIAL GROUP	3330/11-11		3,784.67	7,569.33		
INTERNATIONAL TOURS ALEXANDRIA	3312/10-29					
JANE VOIGHTS	,,				525.00	
SUBTOTALS:		303.79	3,929.67	7,569.33	572.64	

DESCRIPTION OF EVENT/ DATE OF EVENT/ PAYEE	CHECK # & CHECK DATE	IOWA ALLOCABLE AMT	IOWA TRVL-NON ALLOCABLE	OTHER EXPENSES	MEMO ENTRY EXPS	ATTENDEES @ EVENT
11/24/86-11/26/86 MEETING @ DSM/AGRICULTURE SUMMIT CONFERENCE						ATTENDEES: SENATOR DOLE FLOYD BROWN SANDRA CHURCH SARA CEDARHOLM GOVERNOR BRANSTAD CONGRESSMAN LEACH CONGRESSMEN TAUKE T GRANDY M SCANLON
FLOYD BROWN	3487/12-05				188.67	
SARA CEDARHOLM	3620/12-24	236.50				
LESHER & ASSOCIATES	3479/12-02	52.50	222.50			
AIRPORT HILTON	3395/11-20	208.00				
AIRPORT HILTON	3791/1-21	379.28				
INTERNATIONAL TOURS ALEXANDRIA	3505/12-05					
FLOYD BROWN	,,				480.00	
SARA CEDARHOLM	,,		234.00			
AMERICAN FINANCIAL CORPORATION	3607/12-23		4,785.00			
BETTY'S WORLD OF TRAVEL	3793/1-21		264.00			
SUBTOTALS:		876.28	5,505.50		668.67	
12/02/86-12/07/86 DOLE'S ADDRESS TO IOWA SHERIFFS & DEPUTIES ASSOCIATION						ATTENDEES: SENATOR DOLE FLOYD BROWN PENNY BROWN SARA CEDARHOLM
FLOYD BROWN	3867/2-02				61.09	
PENNY BROWN	3645/1-07				92.42	
RUAN INCORPORATED	3520/12-09		2,175.00			
INTERNATIONAL TOURS ALEXANDRIA	3595/12-23					
SARA CEDARHOLM	,,		228.00			
FLOYD BROWN	,,				250.00	
SARA CEDARHOLM		269.04	10.00		5.00	
SUBTOTALS:		269.04	2,413.00	0	408.51	

1987

DESCRIPTION OF EVENT/ DATE OF EVENT/ PAYEE	CHECK # & CHECK DATE	IOWA ALLOCABLE AMT	IOWA TRVL-NON ALLOCABLE	OTHER EXPENSES	MEMO ENTRY EXPS	ATTENDEES @ EVENT
1/12/87						
DOLE'S ADDRESS TO LUMBERMAN'S ASSOCIATION						ATTENDEES:
						SEN DOLE
FLOYD BROWN	3867/2-02				57.98	T SYNHORST
HOTEL FORT DSM	4235/3-23	640.47				F BROWN
AVIS RENT-A-CAR FOR:	3924/2-10					
TOM SYNHORST	,,				87.97	
TOM SYNHORST	3792/1-21				156.11	
CONAGRE.INC	3699/1-09		845.00	1,690.00		
BUSINESSMAN'S ASSURANCE CO	3766/1-16		481.67	2,408.33		
INTERNATIONAL TOURS ALEXANDRIA	3803/1-22					
TOM SYNHORST	,,				278.00	
SUBTOTALS:		640.47	1,326.67	4,098.33	580.06	
1/21/87-1/23/87						
DOLE'S ADDRESS TO AGC						ATTENDEES:
						SEN DOLE
						T SYNHORST
HOTEL FORT DSM	4235/3-23	871.94				F BROWN
INTERNATIONAL TOURS ALEXANDRIA	3803/1-22					
TOM SYNHORST	,,				390.00	
FLOYD BROWN	3871/1-22				328.00	
KVI AVIATION	3773/1-20		2,610.00			
SUBTOTALS:		871.94	2,610.00		718.00	

DESCRIPTION OF EVENT/ DATE OF EVENT/ PAYEE	CHECK # & CHECK DATE	IOWA ALLOCABLE AMT	IOWA TRVL-NON ALLOCABLE	OTHER EXPENSES	MEMO ENTRY EXPS	ATTENDEES @ EVENT
1987						
TOWN MEETINGS:						ATTENDEES:
						SEN DOLE
2/07/1987						T SYNHORST
TOWN MEETING @ ORANGE CITY & IOWA BANKERS ASSOCIATION ADDRESS						
LONG LINE COMMUNICATIONS	3899/2-06		1,938.00			
THE COMPANIES OF CLARK	4345/4-09	344.88				
US POSTMASTER	3823/1-27	2,349.48				
MACDONALD LETTER SERVICE	4350/4-10	470.65				
TOM SYNHORST	4073/2-26				341.69	
SUBTOTALS:		3,165.01	1,938.00		341.69	
2/12/1987						
TOWN MEETING						ATTENDEES:
						SEN DOLE
						T SYNHORST
MACDONALD LETTER SERVICE	4350/4-10	199.00				BEV TAUKE
US POSTMASTER	3850/1-?	1,785.14				C LEHMKUHL
GROWTH INDUSTRIES	3902/2-06		983.50	2,950.50		
INTERNATIONAL TOURS ALEXANDRIA	4018/2-20					
BEVERLY TAUKE	''		598.00			
TOM SYNHORST	''				696.00	
TOM SYNHORST	4044/2-25				372.37	
SUBTOTALS:		1,984.14	1,581.50	2,950.50	1,068.37	
2/22/87						
TOWN MEETING, DSM						ATTENDEES:
						SENATOR DOLE
MACDONALD LETTER SERVICE	4262/3-31	1,762.00				T SYNHORST
US POSTMASTER	3952/2-16	7,215.60				M GLASSNER
DES MOINES AIRPORT HILTON	4246/3-24	36.10				
DES MOINES AIRPORT HILTON	4024/2-23	338.00				
REFCO INCORPORATED	3989/2-19		1,383.00	1,383.00		
INTERNATIONAL TOURS ALEXANDRIA	4109/3-04					
TOM SYNHORST	''				390.00	
TOM SYNHORST					167.08	
SUBTOTALS:		9,351.70	1,383.00	1,383.00	557.08	

DESCRIPTION OF EVENT/ DATE OF EVENT/ PAYEE	CHECK # & CHECK DATE	IOWA ALLOCABLE AMT	IOWA TRVL-NON ALLOCABLE	OTHER EXPENSES	MEMO ENTRY EXPS	ATTENDEES @ EVENT
2/23/87						ATTENDEES:
BREAKFAST MEETING, DAVENPORT						SENATOR DOLE
KVI AVIATION	3990/2-19		1,620.00			M GLASSNER
BLACKHAWK HOTEL FOR:	4236/3-23					S MATTER
FLOYD BROWN	"				41.42	T SYNHORST
TOM SYNHORST	"				41.42	F BROWN
S MATTER	"	41.42				
M GLASSNER	"	60.35				
SENATOR DOLE	"	254.17				
TOM SYNHORST					97.02	
SUBTOTALS:		355.94	1,620.00	0	179.86	
SUBTOTALS:	3/31/86	1,822.41	6,183.15	0	544.48	
	4/04/86	707.10	4,726.23	226.68	453.57	
	4/18/86	2,181.22	0	0	1,323.59	
	4/30/86	4,338.54	204.93	256.96	1,380.74	
	6/20/86	647.60	1,462.50	0	979.20	
	7/25/86	0	0	0	475.18	
	8/03/86	29.83	3,728.00	0	1,646.76	
	8/22/86	2,238.15	3,528.00	706.78	1,173.13	
	9/19/86	377.06	3,464.84	5,205.66	706.94	
	10/21/86	108.59	530.00	0	225.83	
	10/27/86	303.79	3,929.67	7,569.33	572.64	
	11/24/86	876.28	5,505.50	0	688.67	
	12/02/86	269.04	2,413.00	0	408.51	
	1/12/87	640.47	1,326.67	4,098.33	580.06	
	1/21/86	871.94	2,610.00	0	718.00	
	2/07/87	3,165.01	1,938.00	0	341.69	
	2/12/87	1,984.14	1,581.50	2,950.50	1,068.37	
	2/22/87	9,351.70	1,383.00	1,383.00	557.08	
	2/23/87	355.94	1,620.00	0	179.86	
GRAND TOTALS:		30,268.81	46,134.99	22,397.24	14,024.30	$112,825.34

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DOLE FOR PRESIDENT

Definition of Columns:

- Iowa Allocable Amount - These CA expenses are allocable to the Iowa spending limitation. Since CA personnel are not Committee employees, the "5 day rule" is not applied.

- Iowa Travel Non-Allocable - These expenses relate to CA Iowa activity but are for interstate travel, interstate telephone expenses, etc., and as such are not allocable to the Iowa spending limitation.

- Other Expenses - These expenses do not relate to Iowa but were paid with a CA check which also paid expenses related to Iowa.

- Memo Entry Expenses - These expenses are included in amounts discussed with respect to the payee. They are shown here only to provide a more complete picture of the event and attendees.

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DOLE FOR PRESIDENT
Campaign America Expenses -
Floyd Brown

Payee	Dates	Check #	Check Date	Iowa Allocable Amount	Non-Allocable Iowa Amount	Other Amount	Salary
Floyd Brown	03/18/86-03/22/86	1804	04/07/86	$ 545.26	$ -0-	$ -0-	
Inter. Nat. Tours	03/18/86	1775	04/01/86	-0-	434.00	-0-	
Floyd Brown	03/23/86-3/26/86	1803	04/07/86	680.11	469.00	-0-	
Federal Express	03/25/86	2091	06/04/86	23.00	-0-	-0-	
Floyd Brown	03/16/86-3/31/86	Report	04/01/86				$1,185.92
Floyd Brown	03/30/86-04/01/86	1805	04/07/86	254.58	-0-	-0-	
Inter. Nat. Tours	03/30/86	1775	04/01/86	-0-	290.00	-0-	
Floyd Brown	04/02/86-04/05/86	1805	04/07/86	370.56	468.00	33.02	
Inter. Nat. Tours	04/02/86	1884	04/21/86	-0-	285.00	-0-	
Floyd Brown	04/01/86-04/15/86	Report	04/15/86				1,185.92
Inter. Nat. Tours	04/16/86	1884	04/21/86	-0-	730.00	-0-	
Floyd Brown	04/16/86-04/18/86	1905	04/29/86	216.98	-0-	299.02	
Floyd Brown	04/19/86-04/25/86	1905	04/29/86	425.82	-0-	47.50	
	04/22/86-04/25/86	2425	08/05/86	129.30	-0-	-0-	
Floyd Brown	04/15/86-04/30/86	Report	04/29/86				1,185.92
Floyd Brown	04/29/86-05/04/86	1984	05/14/86	675.90	-0-	510.39	
HT. FT. DSM	04/29/86-05/04/86	2042	05/27/86	445.90	-0-	-0-	
Floyd Brown	05/01/86-05/04/86	2425	08/05/86	258.94	-0-	-0-	
Floyd Brown	05/01/86-05/15/86	Report	05/14/86				1,185.92
HT. FT. DSM	05/15/86-05/17/86	2078	06/02/86	153.52	-0-	-0-	
Floyd Brown	05/15/86-05/17/86	2149	06/16/86	244.37	-0-	646.15	
Floyd Brown	05/16/86-05/31/86	Report	06/01/86				1,185.92

Payee	Dates	Check #	Check Date	Iowa Allocable Amount	Non-Allocable Iowa Amount	Other Amount	Salary
Floyd Brown	06/09/86-06/11/86	2149	06/16/86	171.90	-0-	-0-	
	06/09/86-06/11/86	2425	08/05/86	142.40	-0-	-0-	
Inter. Nat. Tours	06/09/86	2144	06/16/86	-0-	444.00	-0-	
HT. FT. DSM	06/09/86-06/11/86	2151	06/16/86	129.94	-0-	-0-	
Floyd Brown	06/01/86-06/15/86	Report	06/15/86				1,185.92
Floyd Brown	06/18/86-06/20/86	2203	06/25/86	339.14	-0-	79.30	
Inter. Nat. Tours	06/18/86	2261	07/02/86	-0-	464.00	-0-	
Floyd Brown	06/26/86-06/29/86	2297	07/08/86	201.43	-0-	350.47	
	06/26/86	2425	08/05/86	8.50	-0-	-0-	
Floyd Brown	06/16/86-06/30/86	Report	06/25/86				1,185.92
Floyd Brown	07/01/86-07/15/86	Report	07/15/86				1,185.92
Inter. Nat. Tours	07/16/86-07/17/86	2370	07/24/86	-0-	290.00	-0-	
HT. FT. DSM	07/16/86-07/17/86	2392	07/28/86	138.07	-0-	49.90	
Floyd Brown	07/16/86-07/17/86	2425	08/05/86	134.81	-0-	-0-	
HT. FT. DSM	07/22/86-07/24/86	2397	07/28/86	120.05	-0-	-0-	
Floyd Brown	07/22/86-07/23/86	2425	08/05/86	138.04	-0-	-0-	
Fed - Exp	07/23/86	2450	08/08/86	23.00	-0-	-0-	
Inter. Nat. Tours	07/22/86	2430	08/05/86	-0-	247.00	-0-	
Burlington Ind.	07/26/86	2377	07/25/86	-0-	903.00	-0-	
Floyd Brown	07/15/86-07/31/86	Report	08/01/86				1,185.92
Floyd Brown	08/03/86-08/04/86	2506	07/03/86	51.56	-0-	14.00	
Inter. Nat. Tours	08/03/86	2468	08/12/86	-0-	480.00	-0-	
HT. FT. DSM	08/04/86	2487	08/14/86	105.14	-0-	-0-	
Floyd Brown	08/01/86-08/15/86	Report	08/15/86				1,185.92
Inter. Nat. Tours	08/18/86	2430	08/05/86	-0-	370.00	-0-	
Floyd Brown	08/19/86-08/23/86	2594	09/02/86	354.85	-0-	-0-	
HT. FT. DSM	08/19/86-08/23/86	2814	09/30/86	284.99	-0-	-0-	

Payee	Dates	Check #	Check Date	Iowa Allocable Amount	Non-Allocable Iowa Amount	Other Amount	Salary
Inter. Nat. Tours	08/27/86-08/30/86	2586	09/02/86	-0-	819.00	-0-	
Floyd Brown	08/27/86-08/30/86	2587	09/02/86	217.81	-0-	48.00	
Floyd Brown	08/29/86	2766	09/24/86	118.56	-0-	787.77	
HT. FT. DSM	08/27/86-08/30/86	2653	09/08/86	183.27	-0-	-0-	
Floyd Brown	08/15/86-08/31/86	Report	08/29/86				1,185.92
Floyd Brown	09/01/86-09/15/86	Report	09/15/86				1,185.92
Floyd Brown	09/17/86-09/20/86	2769	09/23/86	266.22	-0-	-0-	
Inter. Nat. Tours	09/17/86	2833	10/01/86	-0-	440.00	-0-	
HT. FT. DSM	09/17/86-09/19/86	3370	11/18/86	103.86	-0-	-0-	
Floyd Brown	09/16/86-10/01/86	Report	10/01/86				1,185.92
HT. FT. DSM	10/08/86-10/10/86	3370	11/18/86	91.18	-0-	-0-	
Floyd Brown	10/08/86-10/10/86	2959	10/15/86	167.21	-0-	-0-	
Inter. Nat. Tours	10/08/86	3071	10/22/86	-0-	480.00	-0-	
Floyd Brown	10/01/86-10/15/86	Report	10/15/86				1,185.92
HT. FT. DSM	10/15/86-10/17/86	3370	11/18/86	133.65	-0-	-0-	
Inter. Nat. Tours	10/15/86	3071	10/22/86	-0-	620.00	-0-	
HT. FT. DSM	10/20/86-10/22/86	3370	11/18/86	136.84	-0-	-0-	
Floyd Brown	10/19/86-10/20/86	3867	02/02/87	6.00	-0-	-0-	
Black Hawk Hotel	10/27/86-10/28/86	3272	11/04/86	47.64	-0-	-0-	
Floyd Brown	10/16/86-10/31/86	Report	11/01/86				1,185.92
Floyd Brown	11/01/86-11/15/86	Report	11/15/86				1,185.92
Floyd Brown	11/24/86-11/26/86	3487	12/05/86	170.67	-0-	-0-	
Inter. Nat. Tours	11/24/86	3515	12/26/86	-0-	480.00	-0-	
Floyd Brown	11/16/86-11/30/86	Report	11/26/86				1,185.92

Payee	Dates	Check #	Check Date	Iowa Allocable Amount	Non-Allocable Iowa Amount	Other Amount	Salary
Inter. Nat. Tours	12/04/86-12/07/86	3595	12/22/86	-0-	250.00	-0-	
Floyd Brown	12/06/86	3867	02/02/87	61.09	-0-	-0-	
Inter. Nat. Tours	12/11/86-12/12/86	3595	12/22/86	-0-	480.00	-0-	
Floyd Brown	12/11/86-12/12/86	3867	02/02/87	8.00	-0-	-0-	
Floyd Brown	12/01/86-12/15/86	Report	12/15/86				1,185.92
Floyd Brown	12/15/86-12/31/86	Report	01/01/87				1,288.92
Floyd Brown	01/12/87-01/13/87	3867	02/02/87	57.98	-0-	-0-	
Floyd Brown	01/01/887-01/15/87	Report	01/15/87				1,288.92
Floyd Brown	01/17/87	3867	02/02/87	5.25	-0-	-0-	
Inter. Nat. Tours	01/21/87	3871	02/03/87	-0-	328.00	-0-	
Floyd Brown	01/23/87	3867	02/02/87	7.00	-0-	-0-	
Floyd Brown	01/16/87-01/31/87	Report	02/01/87				1,288.92
Floyd Brown	02/01/87-02/15/87	Report	02/13/87				1,288.00
Black Hawk Hotel	02/22/87-02/23/87	4236	03/23/87	41.42	-0-	-0-	
Floyd Brown	02/16/87-02/28/87	Report	02/27/87				1,288.92
Total Salary and Documented Expenses				8,591.71	9,771.00	2,865.52	27,790.24
From Reports Only			10/01/86	125.94			
			10/10/86	451.15			
			11/06/86	107.95			
			01/19/87	119.42			
			02/10/87	527.30			
			03/18/87	338.69			
TOTAL				$10,262.16	$9,771.00	$2,865.52	$27,790.24

Iowa Allocable Total (Iowa Allocable Amount and Salary)	47,823.40
Iowa Non Allocable	9,771.00
Iowa Total	$38,052.40

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DOLE FOR PRESIDENT
Campaign America Expenses -
Tom Synhorst

Payee	Dates	Check #	Check Date	Iowa Allocable Amount	Non-Allocable Iowa Amount	Other Expenses	Salary
Tom Synhorst	04/01/86-05/31/86	Report	06/23/86				$ 2,000.00
Tom Synhorst	06/01/86-06/30/86	Report	07/01/86				1,000.00
Tom Synhorst	07/01/86-07/31/86	Report	07/31/86				1,000.00
Tom Synhorst	08/01/86-08/31/86	Report	08/29/86				1,000.00
Tom Synhorst	09/01/86-09/31/86	Report	10/06/86				1,000.00
Federal Express	10/23/86	3293	11/05/86	14.00	-0-	-0-	
Tom Synhorst	10/01/86-10/31/86	Report	11/01/86				1,000.00
Tom Synhorst	11/01/86-11/30/86	Report	12/02/86				1,000.00
Tom Synhorst	12/01/86-12/31/86	Report	01/07/87				1,000.00
Int. Nat. Tours	12/11/86	3595	12/22/86	-0-	390.00	-0-	
Tom Synhorst	01/01/87-01/15/87	Report	01/15/87				1,507.52
Tom Synhorst	01/08/87-01/13/87	3792	01/21/87	86.21	-0-	69.90	
Avis Rent-a-Car	01/08/87-01/13/87	3924	02/10/87	87.97	-0-	-0-	
Int. Nat. Tours	01/08/87	3803	01/22/87	-0-	278.00	-0-	
Tom Synhorst	01/16/87-01/31/87	Report	02/01/87				1,507.52
Int. Nat. Tours	01/19/87*/	3803	01/22/87	-0-	390.00	-0-	

*/ See Federal Express delivery to Hotel FT DSM 1/22/87.

DOLE FOR PRESIDENT
Campaign America Expenses -
Tom Synhorst

Payee	Dates	Check #	Check Date	Iowa Allocable Amount	Non-Allocable Iowa Amount	Other Amount	Salary
Hotel FT. DSM	01/27/87-01/30/87	4235	03/23/87	706.77	-0-	-0-	
Federal Express	01/28/87	3973	02/18/87	11.00	-0-	-0-	
Tom Synhorst	01/27/87-01/29/87	4057	02/26/87	229.08	-0-	-0-	
Int. Nat. Tours	01/30/87	3871	02/03/87	-0-	215.00	-0-	
Tom Synhorst	02/01/87-02/15/87	Report	02/13/87				1,507.52
Tom Synhorst	02/02/87-02/07/87	4073	02/26/87	341.69	-0-	-0-	
Int. Nat. Tours (Flight to Cedar Rapids)	02/03/87	3891	02/03/87	-0-	518.00	-0-	
Tom Synhorst	02/16/87-02/17/87	Report	02/22/87				1,455.52
Tom Synhorst	02/10/87-02/13/87	4044	02/25/87	372.37	-0-	-0-	
Int. Nat. Tours	02/10/87	4018	02/20/87	-0-	696.00	-0-	
Tom Synhorst	02/18/87-02/24/87	4164	03/12/87	557.90	-0-	-0-	
Int. Nat. Tours	02/18/87	4109	03/04/87	-0-	390.00	-0-	
Blackhawk Hotel	02/22/87-02/23/87			41.42	-0-	-0-	
Int. Nat. Tours	03/03/87	4109	03/04/87	-0-	390.00	-0-	
Tom Synhorst		Report	04/16/87	262.29			
Grand Total				$2,710.70	$3,267.00	$ 69.90	$14,978.08

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Total Expenses	$20,955.78
Total Non-Allocable for Iowa	3,267.00
Total Iowa Allocable	$17,688.78

DOLE FOR PRESIDENT
Campaign America Expenses -
Iowa Staff

Payee	Dates	Check #	Check Date	Iowa Allocable Amount	Non-Allocable Iowa Amount	Other Expenses	Salary
			JANE VOIGHTS				
Jane Voights	06/15/86-06/30/86	2290	07/07/86				$ 400.00
Jane Voights	06/10/86-06/18/86	2343	07/11/86	$288.54			
HT FT DSM	06/20/86-06/21/86	2277	07/03/86	176.06			
Jane Voights	06/26/86-06/29/86	2905	10/09/86	103.36			
Jane Voights	06/15/86-07/15/86	2905	10/09/86	339.26			
Jane Voights	07/01/86-07/31/86	2454	08/11/86				800.00
Jane Voights	07/10/86-07/19/86	2455	08/11/86	118.57			
HT FT DSM	07/16/86-07/17/86	2392	07/28/86	49.90			
Jane Voights	07/13/86-07/28/86	2456	08/11/86	641.45			
HT FT DSM	07/24/86	2792	09/25/86	72.29			
HT FT DSM	07/26/86-07/27/86	2429	08/07/86	55.14			
Jane Voights	August - September	3165	10/28/86	60.08			
Jane Voights	08/01/86-08/31/86	Report	08/29/86				800.00
HT FT DSM	08/04/86-08/05/86	2485	08/14/86	93.06			
Jane Voights	08/03/86-08/05/86	2905	10/09/86	207.68			
Jane Voights	10/25/86-10/28/86	3378	11/18/86	319.20			
Int. Nat. Tours	10/25/86	3212	10/29/86	525.00			
TOTAL Jane Voights				$3,049.89	-0-	-0-	$2,000.00

DOLE FOR PRESIDENT
Campaign America Expenses -
Iowa Staff

Payee	Dates	Check #	Check Date	Iowa Allocable Amount	Non-Allocable Iowa Amount	Other Expenses	Salary
			JOEN REHMANN				
John Rehmann	Unknown	1917	04/30/86				$ 500.00
John Rehmann	04/04/86-05/26/86	2152	06/16/86	$ 109.22			225.00
John Rehmann	07/25/86-09/01/86	3335	11/11/86				250.00
John Rehmann	Lease Negot.	3335	11/11/86				100.00
John Rehmann	07/25/86-09/01/86	3335	11/11/86	125.18			
John Rehmann	09/01/86-10/01/86	3336	11/11/86	338.00		4.70	
John Rehmann	10/01/86-10/31/86	3440	11/25/86	118.75			337.50
John Rehmann	11/01/86-01/19/87	3844 and 4059	01/29/87 and 02/26/87	275.78			1,350.00
TOTAL John Rehmann				$966.93	-0-	$ 4.70	$2,762.50

DOLE FOR PRESIDENT
Campaign America Expenses - Iowa Staff

Payee	Dates	Check #	Check Date	Iowa Allocable Amount	Non-Allocable Iowa Amount	Other Expenses	Salary
			CAL HULTMAN				
Cal Hultman	09/01/86-09/15/86	2804	09/26/86				$ 750.00
Cal Hultman	09/02/86-09/05/86	2782	09/24/86	$ 259.76			
Cal Hultman	09/07/86-09/12/87	2781	09/24/86	280.84			
Cal Hultman	09/16/86-10/31/86	3032	10/17/86				2,250.00
Cal Hultman	09/16/86-09/19/86	2818	09/30/86	188.70			
Cal Hultman	09/22/86-09/26/86	2950	10/15/86	433.36			
Cal Hultman	09/30/86	2951	10/15/86	114.63			
Cal Hultman	10/05/86-10/15/86	3379	11/18/86		6.61		
Cal Hultman	10/11/86	3139	10/28/86	85.22			
Cal Hultman	10/22/86	3138	10/28/86	88.99			
Cal Hultman	10/28/86	3304	11/06/86	48.20			
Cal Hultman	11/01/86-11/15/86	Report	11/01/86				750.00
Cal Hultman	11/16/86-11/30/86	3374	11/01/86				750.00
Cal Hultman	11/18/86	3581	12/18/86	16.30			
Cal Hultman	12/01/86-12/15/86	Report	12/02/86				750.00
Cal Hultman	12/16/86-12/31/86	3554	12/15/86				750.00
Cal Hultman	01/01/87-01/15/87	Report	01/07/87				750.00
Cal Hultman	01/16/87-01/31/87	3747	01/15/87				750.00
Cal Hultman	02/01/87-02/15/87	Report	02/02/87				750.00
Cal Hultman	02/16/87-02/28/87	Report	03/02/87				750.00
Cal Hultman	03/01/87-03/31/87	4413	04/28/87				1,500.00
TOTAL Cal Hultman				$1,516.00	$6.61	-0-	$10,500.00

DOLE FOR PRESIDENT
Campaign America Expenses -
Iowa Staff

Payee	Dates	Check #	Check Date	Iowa Allocable Amount	Non-Allocable Iowa Amount	Other Expenses	Salary
			PENNY BROWN				
Int. Nat. Tours	10/06/86	3071	10/22/86		$ 491.00		
Penny Brown	10/07/86	2947	10/15/86		83.13		
Int. Nat. Tours	11/20/86	3871	12/26/86		360.00		
Penny Brown	11/20/86-11/21/86	3564	12/17/86		120.47		
Penny Brown	12/01/86-12/31/86	3540	12/09/86				$ 2,400.00
Penny Brown	12/03/86-12/09/86	3645	01/07/87	92.42			
Penny Brown	01/01/87-01/31/87	3789	01/21/87				2,400.00
TOTAL Penny Brown				$ 92.42	$1,054.60	-0-	$ 4,800.00

DOLE FOR PRESIDENT
Campaign America Expenses -
Iowa Staff

Payee	Dates	Check #	Check Date	Iowa Allocable Amount	Non-Allocable Iowa Amount	Other Expenses	Salary
JEFF NELSON							
Jeff Nelson		3334	11/11/86				$1,750.00
Jeff Nelson		3811	01/23/87				1,750.00
TOTAL Jeff Nelson				-0-	-0-	-0-	$3,500.00
CAROL LEHMKUHL							
Carol Lehmkuhl	February 1987	4103	03/04/87	-0-	-0-	-0-	1,200.00
WYTHE WILLEY							
Wythe Willey	01/01/87-02/28/87	4263	03/31/87	-0-	-0-	-0-	4,000.00
Iowa Staff Totals				$5,625.24	$1,061.21	$ 4.70	$28,762.50

Total Iowa Amount	$ 35,448.95
Less: Iowa Non-Allocable	1,061.21
Iowa Allocable Amount	$ 34,387.74

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DOLE FOR PRESIDENT
Campaign America Records -
Iowa Miscellaneous Expenses

Payee	Dates	Check #	Check Date	Iowa Allocable Amount	Non-Allocable Iowa Amount	Other Expenses
Joseph Barret	03/23/86-03/26/86	1703	———			
		1814	04/08/86	$ 168.57		
Grassley '86 Committee	N/A	3794	01/21/87	1,100.00		
Postmaster	N/A	2153	06/17/86	1,170.00		
	N/A	2359	07/23/86	132.00		
	N/A	2361	07/23/86	102.00		
HT. FT. DSM for S. Sego	05/14/86-05/16/86	2095	06/04/86	91.15		
Elaine Smith	02/23/87	4261	03/31/87	188.56		
Torchmark Corp.	12/23/86	3594	12/22/86		649.00	649.00
Watergate Terrace	12/16/86	3711	01/13/86	72.83		
	12/16/86	4162	03/12/86	72.82	———	———
TOTALS				$3,097.93	649.00	649.00

Total Iowa Amount	$3,746.93
Less Non-Allocable Amount	649.00
Iowa Allocable Amount	$3,097.93

DOLE FOR PRESIDENT
REVIEW OF CAMPAIGN AMERICA PAC RECORDS
SCHEDULE OF EVENTS AND MEETINGS HELD IN NEW HAMPSHIRE BETWEEN:
3/02/86-2/16/87

(SEE EXPLANATION OF COLUMN HEADINGS ON PAGE 5 of 5)

EVENTS:

DESCRIPTION OF EVENT/ DATE OF EVENT/ PAYEE	CHECK # & CHECK DATE	NH ALLOCABLE AMOUNT	NH TRVL-NON ALLOCABLE	OTHER EXPENSES	MEMO ENTRY EXPENSES	ATTENDEES @ EVENT
1986						ATTENDEES:
3/02/86						PAUL RUSSO
MEETING @ HOLIDAY INN MANCHESTER, NH						KIRK CLINKENBEARD
						SENATOR DOLE
PAUL RUSSO	1638/3-12	14.50		362.66		
KIRK CLINKENBEARD	1639/3-12	656.70				
US JET AVIATION	1694/3-19		1,567.79	3,135.58		
SUBTOTALS:		671.20	1,567.79	3,498.24		
6/13/86-6/14/86						ATTENDEES:
SENATOR RUDMAN EVENT-NH						BRIAN BERRY
						SENATOR DOLE & STAFF
						PAUL RUSSO
BRIAN BERRY	2223/6-27	70.49		70.49		
BRIAN BERRY	2174/6-23	93.45		112.00		
PAUL RUSSO	2248/6-30				495.06	
AMERICAN FINANCIAL CORPORATION	2178/6-23		750.00	1,800.00		
INTERNATIONAL TOURS ALEXANDRIA	2144/6-16					
BRIAN BERRY	"		115.00			
US TOBACCO	2180/6-23		2,351.00	2,711.00		
SUBTOTALS:		163.94	3,216.00	4,693.49	495.06	
6/18/86-6/20/86						ATTENDEES:
MEETING/EVENT UNKNOWN @ MANCHESTER						DONALD DEVINE
						PAUL RUSSO
AMERICAN EXPRESS FOR:	2294/7-08					
DONALD DEVINE	"	189.85				
DONALD DEVINE	"			201.36		
PAUL RUSSO	2249/6-30				96.57	
CAREY OF BOSTON FOR:	2289/7-07					
DONALD DEVINE	"	202.72				
SUBTOTALS:		392.57		201.36	96.57	

DESCRIPTION OF EVENT/ DATE OF EVENT/ PAYEE	CHECK # & CHECK DATE	NH ALLOCABLE AMOUNT	NH TRVL-NON ALLOCABLE	OTHER EXPENSES	MEMO ENTRY EXPENSES	ATTENDEES @ EVENT
8/24/86-8/29/86						ATTENDEES:
PHOTO OPPORTUNITY DALE BANQUET (8/26/86)						CHRIS CUSHING
SEABROOK LUNCHEON-(8/27/86)						BRIAN BERRY
						ELIZABETH DOLE
						SENATOR DOLE
						SUZANNE NIEMELA
INTERNATIONAL TOURS ALEXANDRIA	2586/9-02					PAUL RUSSO
CHRIS CUSHING	''		231.00			MIKE GLASSNER
CHRIS CUSHING	''		149.00			JOHN CUBBAGE
BRIAN BERRY	''		81.00			PETER STAHL
BRIAN BERRY	''		279.00			
US TOBACCO	2537/8-22		877.00			
SKYMASTER AIR TAXI FOR:	2710/9-17					
'ELIZABETH DOLE PLUS ONE'	''	614.60				
NEW HAMPSHIRE HELICOPTERS, INC	2657/9-10	1,636.50				
AMERICAN EXPRESS FOR:	2878/10-07					
DONALD DEVINE	''	340.11		111.40		
AMERICAN EXPRESS FOR:	2623/9-05					
DONALD DEVINE	''	151.27		410.12		
ALEXANDRIA POSTMASTER	2544/8-26	10.75				
CAREY OF BOSTON FOR:	2649/9-08					
DONALD DEVINE	''	171.08				
BALD PEAK COLONY CLUB FOR:	2667/9-10	1,873.60				
SENATOR DOLE	''					
ELIZABETH DOLE	''					
MIKE GLASSNER	''					
JOHN CUBBAGE	3235/10-30	715.30	24.60			
BALD PEAK COLONY CLUB	2788/9-25	266.00				
RAMADA INN	2604/9-03	419.12				
PETER STAHL	3028/10-17	34.96				
GREENHOUSE RESTAURANT	3342/11-12	900.00				
TONI PAPPAS & ASSOCIATES	2819/9-30	601.00				
PAUL RUSSO	2704/9-17				1,469.71	
PAUL RUSSO	2845/10-07				1,289.37	
SUZANNE NIEMELA	2849/10-03				814.20	
SUBTOTALS:		7,734.29	1,641.60	521.52	3,573.28	
10/05/86						ATTENDEES:
NEW HAMPSHIRE REPUBLICAN CONVENTION						BILL LACY
						SUZANNE NIEMELA
WILLIAM B LACY	3340/11-11	198.23		77.78		
NEW HAMPSHIRE HIGHWAY HOTEL	3207/10-29	149.62				
INTERNATIONAL TOURS ALEXANDRIA	3071/10-22					
B LACY	''		188.00			
SUBTOTALS:		347.85	188.00	77.78		

DESCRIPTION OF EVENT/ DATE OF EVENT/ PAYEE	CHECK # & CHECK DATE	NH ALLOCABLE AMOUNT	NH TRVL-NON ALLOCABLE	OTHER EXPENSES	MEMO ENTRY EXPENSES	ATTENDEES @ EVENT
10/24/86						ATTENDEES:
PRESS CONFERENCE @ CONCORD NH						SUZANNE NEIMELA
						SENATOR DOLE
SUZANNE NIEMELA	3500/12-05				140.70	
SUBTOTALS:					140.70	
12/12/86-12/13/86						ATTENDEES:
SENATOR DOLE ADDRESSES THE PORTSMOUTH ROTARY CLUB 12/12						SENATOR DOLE
SENATOR DOLE ADDRESSES THE UNIVERSITY OF NH AT COMMENCEMENT DURHAM, NH 12/13						SUZANNE NEIMELA
HOLIDAY INN MANCHESTER	3664/1-07	202.75				
HOLIDAY INN MANCHESTER	3571/12-18	108.85				
AMERICAN FINANCIAL GROUP	3606/12-23		902.00	902.00		
NEW HAMPSHIRE HELICOPTER, INC	3684/1-07	795.00				
NEW HAMPSHIRE HELICOPTER, INC	3685/1-07	932.86				
SUZANNE NEIMELA	3651/1-07				500.69	
NEW ENGLAND CENTER FOR CONTINUING EDUCATION FOR: SUZANNE NIEMELA	3650/1-07				121.70	
SUBTOTALS:		2,039.46	902.00	902.00	622.39	
1987						ATTENDEES:
1/24/87-1/26/87						JEFF MANSFIELD
BRUNCH FOR 67 (1/25/87)						SUZANNE NEIMELA
						SENATOR DOLE
JEFF MANSFIELD	4001/2-20	123.32				BRIAN BERRY
HOLIDAY INN	3786/1-20	100.00				
SHERATON TARA	3772/1-19	195.00				
RED JACKET MOUNTAIN VIEW	3976/2-18	572.18				
NEW HAMPSHIRE HELICOPTERS, INC	3884/2-03	2,012.50				
US TOBACCO	3808/1-23		1,150.00			
INTERNATIONAL TOURS ALEXANDRIA	3871/2-03					
BRIAN BERRY	''		318.00			
SUZANNE NIEMELA	3914/2-10				828.48	
SUBTOTALS:		3,003.00	1,468.00		828.48	

DESCRIPTION OF EVENT/ DATE OF EVENT/ PAYEE	CHECK # & CHECK DATE	NH ALLOCABLE AMOUNT	NH TRVL-NON ALLOCABLE	OTHER EXPENSES	MEMO ENTRY EXPENSES	ATTENDEES @ EVENT
2/16/87						ATTENDEES:
SENATOR DOLE ADDRESSES THE KEENE, NEW HAMPSHIRE ROTARY CLUB BREAKFAST FOR 60 PEOPLE						SUZANNE NEIMELA BRIAN BERRY SENATOR DOLE
THE BOILERHOUSE	4150/3-11	1,185.10				
RAMADA INN	3905/2-10	250.00				
ROCKINGHAM COUNTY REPUBLIUCAN COMMITTEE	4048/2-25	150.00				
JOHN MULAZZI	4166/3-12	88.30				
INTERNATIONAL TOURS ALEXANDRIA	4018/2-20					
BRIAN BERRY			139.00			
SUZANNE NIEMELA	4163/3-12				396.99	
SUBTOTALS:		1,673.40	139.00		396.99	
SUBTOTALS:	3/02/86	671.20	1,567.79	3,498.24		
	6/13/86	163.94	3,216.00	4,693.49	495.06	
	6/18/86	392.57		201.36	96.57	
	8/24/86	7,734.29	1,641.60	521.52	3,573.28	
	10/05/86	347.85	188.00	77.78		
	10/24/86				140.70	
	12/12/86	2,039.46	902.00	902.00	622.39	
	1/24/86	3,003.00	1,468.00		828.48	
	2/16/86	1,673.40	139.00		396.99	
GRAND TOTALS:		16,025.71	9,122.39	9,894.39	6,153.47	$41,195.96

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DOLE FOR PRESIDENT

Definition of Columns:

- New Hampshire Allocable Amount - These CA expenses are allocable to the New Hampshire spending limitation. Since CA personnel are not Committee employees, the "5 day rule" is not applied.

- New Hampshire Travel Non-Allocable - These expenses relate to CA New Hampshire activity but are for interstate travel, interstate telephone expenses, etc., and as such are not allocable to the New Hampshire spending limitation.

- Other Expenses - These expenses do not relate to New Hampshire but were paid with a CA check which also paid expenses related to New Hampshire.

- Memo Entry Expenses - These expenses are included in amounts discussed with respect to the payee. They are shown here only to provide a more complete picture of the event and attendees.

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DOLE FOR PRESIDENT
Campaign America Expenses -
Paul Russo

Payee	Dates	Check #	Check Date	NH Allocable Amount	Non-Allocable NH Amount	Other Expenses	Salary
Paul Russo	06/03/86	2247	06/30/86	$ 55.59	$ 11.00	-0-	
Paul Russo	06/13/86-06/15/86	2248	06/30/86	477.56	17.50	-0-	
Inter. Nat. Tours	06/13/86	2144	06/16/86	-0-	115.00	-0-	
Paul Russo	06/19/86-06/20/86	2249	06/30/86	87.57	9.00	-0-	
Paul Russo	06/01/86-06/30/86	Report	07/01/86				$ 2,500.00
Paul Russo	07/01/86-07/03/86	2355	07/21/86	401.51	17.50	-0-	
Inter. Nat. Tours	06/30/86	2261	07/02/86	-0-	149.00	-0-	
Paul Russo	07/01/86-07/31/86	Report	07/30/86				2,500.00
Paul Russo	07/16/86-07/17/86	2570	08/28/86	278.97	16.00	-0-	
Inter. Nat. Tours	07/16/86	2370	07/24/86	-0-	196.00	-0-	
Paul Russo	07/23/86-07/24/86	2438	08/07/86	282.69	8.00	-0-	
Inter. Nat. Tours	07/23/86	2468	08/12/86	-0-	161.00	-0-	
Paul Russo	08/11/86-08/13/86	2521	08/22/86	508.16	16.50	-0-	
Inter. Nat. Tours	08/11/86	2547	08/26/86	-0-	197.49	-0-	
Paul Russo	08/18/86-08/24/86	2845	10/07/86	1,279.87	9.50	-0-	
Paul Russo	08/24/86-08/29/86	2704	09/17/86	1,469.71	-0-	-0-	
Inter. Nat. Tours	08/18/86	2547	08/26/86	-0-	196.00	-0-	
Paul Russo	08/01/86-08/31/86	Report	09/05/86				2,500.00
TOTAL				$4,841.63	$1,119.49	$ -0-	$7,500.00

New Hampshire Allocable	$12,341.63
New Hampshire Non-Allocable	1,119.49
Total	$13,461.12

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DOLE FOR PRESIDENT
Campaign America Expenses -
Suzanne Niemela

Payee	Dates	Check #	Check Date	NH Allocable Amount	Non-Allocable NH Amount	Other Expenses	Salary
Suzanne Niemela	07/01/86-07/31/86	2481	08/14/86				$ 1,500.00
Abt Associates	7/86-8/86	3208	10/29/86	-0-	141.65	-0-	
Suzanne Niemela	08/24/86-08/29/86	2849	10/03/86	767.70	-0-	46.50	
Suzanne Niemela	08/01/86-08/31/86	2643	09/08/86				1,500.00
Suzanne Niemela	09/01/86-09/30/86	2870	10/06/86				1,500.00
Suzanne Niemela	09/17/86-09/27/86	2946	10/15/86	217.41	-0-	173.25	
Suzanne Niemela	09/28/86-10/04/86	3115	10/27/86	87.10	-0-	-0-	
Suzanne Niemela	10/05/86-10/10/86	3167	10/28/86	137.93	-0-	-0-	
Suzanne Niemela	10/14/86-10/17/86	3166	10/28/86	106.57	-0-	-0-	
Suzanne Niemela	10/20/86-10/25/86	3500	12/05/86	255.77	-0-	-0-	
Concord Answering Service	10/01/86-10/31/86	3294	11/05/86	50.00	-0-	-0-	
Suzanne Niemela	11/01/86-11/30/86	Report	12/02/86				1,500.00
Copy Craft	10/30/86	3295	11/05/86	39.00	-0-	-0-	
Suzanne Niemela	11/02/86-11/08/86	?	?	60.23	-0-	-0-	
Suzanne Niemela	11/09/86-11/15/86	?	?	42.71	-0-	-0-	
Suzanne Niemela	11/23/86-11/29/86	3653	01/07/87	58.68	-0-	-0-	

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DOLE FOR PRESIDENT
Campaign America Expenses -
Suzanne Niemela

Payee	Dates	Check #	Check Date	NH Allocable Amount	Non-Allocable NH Amount	Other Expenses	Salary
Concord Answering Service	12/01/86-12/31/86	3663	01/07/87	50.00	-0-	-0-	
N.E. Center for Continuing Educ.	12/13/86	3650	01/07/87	121.70	-0-	-0-	
Suzanne Niemela	12/07/86-12/13/86	3651	01/07/87	622.32	-0-	-0-	
Suzanne Niemela	12/01/86-12/31/86	3531	12/09/86				1,500.00
Concord Answering Service	01/01/87-01/31/87	3754	01/15/87	104.00	-0-	-0-	
Suzanne Niemela	8/86	3570	12/18/86	460.00	-0-	-0-	
Suzanne Niemela	01/11/87-01/25/87	3914	02/10/87	1,205.94	-0-	-0-	
Suzanne Niemela	01/01/87-01/31/87	Report	01/07/87				1,500.00
Suzanne Niemela	02/01/87-02/28/87	Report	01/30/87				1,500.00
Suzanne Niemela	02/13/87	3951	02/13/87	500.00	-0-	-0-	
Suzanne Niemela	02/09/87-02/14/87	4167	03/12/87	139.88	-0-	-0-	
Suzanne Niemela	02/15/87-02/21/87	4163	03/12/87	432.61	-0-	-0-	
Suzanne Niemela	03/01/87-03/31/87	Report	03/02/87				1,500.00
Expenses from CA Reports							
Suzanne Niemela		Report 3500	12/05/86	358.71	-0-	-0-	

DOLE FOR PRESIDENT
Campaign America Expenses -
Suzanne Niemela

Payee	Dates	Check #	Check Date	NH Allocable Amount	Non-Allocable NH Amount	Other Expenses	Salary
Suzanne Niemela		Report 2564	08/29/86				1,500.00
Less: Check 3531 from Page 1, Line 39 Which Does Not Appear to Have Cleared							(1,500.00)
				$5,818.26	$141.65	$219.75	$12,000.00

Total New Hampshire Allocable	$17,818.26
New Hampshire Non-Allocable	141.65
Other	219.75
TOTAL	$18,179.66

(Excerpted from Final Audit Report, Section III.)

C. Use of Funds for Non-Qualified Campaign Expenses - Allocation of Expenditures to States

Section 9035(a) of Title 26 of the United States Code states, in part, that no candidate shall knowingly incur qualified campaign expenses in excess of the expenditure limitations applicable under section 441a(b)(1)(A) of Title 2.

Section 9038.2(b)(1)(A) of Title 11 of the Code of Federal Regulations provides, in part, that the Commission may determine that amount(s) of any payments made to a candidate from the matching payment account were used for purposes other than to defray qualified campaign expenses. Section 9038.2(b)(2)(ii)(A) states that an example of a Commission repayment determination under paragraph (b)(2) of this section includes determinations that a candidate, a candidate's authorized committee(s) or agents have made expenditures in excess of the limitations set forth in 11 C.F.R. §9035.

Sections 441a(b)(1)(A) and 441a(c) of Title 2 of the United States Code and Section 9035(a) of Title 26 of the United States Code provide, in part, that no candidate for the office of President of the United States who is eligible under Section 9033 of Title 26 to receive payments from the Secretary of the Treasury may make expenditures in any one State aggregating in excess of the greater of 16 cents multiplied by the voting age population of the State, or $200,000, as adjusted by the change in the Consumer Price Index.

Section 106.2(a)(1) of Title 11 of the Code of Federal Regulations states, in part, that expenditures incurred by a candidate's authorized committee(s) for the purpose of influencing the nomination of that candidate for the office of President with respect to a particular State shall be allocated to that State. An expenditure shall not necessarily be allocated to the State in which the expenditure is incurred or paid. In the event that the Commission disputes the candidate's allocation or claim of exemption for a particular expense, the candidate shall

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demonstrate, with supporting documentation, that his or her proposed method of allocation or claim of exemption was reasonable. Further, 11 C.F.R. §106.2(c) describes the various types of activities that are exempted from State allocation.

Section 106.2(c)(5) of Title 11 of the Code of Federal Regulations states, in part, that an amount equal to 10% of campaign workers salaries and overhead expenditures in a particular State may be excluded from allocation to that State as an exempt compliance cost. An additional amount equal to 10% of such salaries and overhead expenditures in a particular State may be excluded from allocation to that State as exempt fundraising expenditures, but this exemption shall not apply within 28 calendar days of the primary election.

Section 106.2(b)(2)(iv) of Title 11 of the Code of Federal Regulations states, in part, that overhead expenditures include, but are not limited to, rent, utilities, office equipment, furniture, supplies, and telephone service base charges.

For the 1988 election, the expenditure limitation for the State of Iowa was $775,217.60 and for the State of New Hampshire was $461,000.00. The Committee provided computerized worksheets to the Audit staff that indicated allocable costs to Iowa and New Hampshire of $793,230.82 and $462,462.20 respectively, as of October 31, 1988. These totals agreed with the totals disclosed by the Committee on its FEC Form 3P, Page 3 as of March 31, 1989.

The Audit staff reviewed the Committee's allocation worksheets and analyzed the Committee's allocation methods. Based on this review the following additions to the Committee's allocation totals are required.

1. Twenty-Five Percent Fundraising Exemption - Travel, Events - Senator Dole and Events - Elizabeth Dole

The Committee applied a 25 percent fundraising exemption to the following expense code categories: Travel (Intra-state), Events - Senator Dole, and Events - Elizabeth Dole. The Committee did not apply the exemption to expenses within 28 days of either primary election.

The Committee Treasurer stated that the 25 percent exemption was taken to reflect the fundraising efforts associated with these three categories. He explained that whenever Senator Dole and Elizabeth Dole were traveling, they would make a request for contributions. Twenty-five percent was selected by the Committee as a "reasonable" judgment of what these requests were

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worth to the Committee's fundraising efforts. No explanation for the inclusion of the Travel category in this calculation was offered by the Committee. No other evidence to support this exemption was provided.

Neither the Act nor the Commission's Regulations provide for a fundraising exemption for these expense categories. In the Interim Audit Report, the Audit staff noted that in the staff's opinion the Committee had not demonstrated that 25 percent fundraising exemption is reasonable. It was also noted that, absent the submission of documentary evidence to demonstrate that these exemptions are reasonable, the amounts excluded by the Committee from the Iowa and New Hampshire expenditure limitations ($28,450.36 and $13,997.06, respectively) had been included in the Audit staff's calculation. Finally, the Committee was requested to submit evidence which revealed the nature of the fundraising appeal for each event, how the appeal was delivered and the amount of resulting contributions.

In response to the Interim Audit Report, the Committee Treasurer cites 11 C.F.R. §100.8(b)(21)(i) which he quotes as follows:

"'Any costs incurred by a candidate...in connection with the solicitation of contributions are not expenditures if incurred by a candidate who has been certified to receive Presidential Primary Matching Fund Payments...'" He continues that "'[i]n connection with the solicitation of contributions' is defined at 11 C.F.R. §100.8(b)(21)(ii) as meaning'...any cost reasonably related to fundraising activity...'" The Treasurer states that "without the transportation of Senator and Secretary Dole through Iowa and New Hampshire, its fundraising appeal would have been zilch."

In response to the Audit staff's Interim Audit Report request for evidence which reveals the nature of the fundraising appeal for each event, how the appeal was delivered and the amount of resulting contributions, the Committee states that "[t]he nature of the fundraising appeal was 'Please give money,' the appeal was delivered by voice and the amount received is irrelevant." The Treasurer further argues that the direct costs listed in 11 C.F.R. §100.8(b)(21)(ii) are not exclusive and that they must only be reasonably related to fundraising. He adds that "[t]he fact that the Audit staff does not believe the transportation and event costs associated with the Senator and Secretary represent 'reasonable' fundraising costs does not preclude them from being such costs" and adds that the Committee took only 25% of these costs as exempt.

The Treasurer concludes that without these costs, the Committee would not have raised much money and that "a reasonable person might believe that 25% of such costs were reasonably associated with fundraising."

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The Audit staff reiterates that in order to exempt from allocation the expenditures included in the three categories discussed above, documentation supporting a fundraising appeal which can be associated with the expenditures is necessary. Since no such documentation was provided in the Committee's response to the Interim Audit Report, no adjustment to the allocations has been made.

2. Fundraising Exemptions - Direct Mail Costs

The Committee separated their direct mail costs into two categories: Postage/Printing and Newsletter/Postcards. For allocation purposes, the Committee excluded a percentage of these direct mail costs as fundraising. This percentage varied from item to item.

The Audit staff reviewed the documentation related to the Iowa and New Hampshire direct mail costs which had been given fundraising exclusions by the Committee to determine if these exclusions were supported. These mailings were targeted for these two states. The auditors did not accept the fundraising exclusions for the costs which had no solicitation samples available to review or for costs which had solicitation samples without a request for funds.

The Committee excluded the following amounts as the fundraising share of the direct mail costs:

Iowa	$217,643.73
New Hampshire	$ 43,877.56

Based on the Audit staff's review of supporting documentation regarding these direct mail costs, we were able to verify $23,369.76 of the $217,643.73 excluded by the Committee for Iowa, leaving the solicitation of funds unverified for direct mail costs of $194,273.97 ($217,643.73 - $23,369.76). The Audit staff applied a 100% fundraising allocation to the $23,369.76 of direct mail costs which contained a fundraising appeal resulting in a credit of $20,370.42 for items not allocated 100% by the Committee. The adjusted unverified Iowa total is $173,903.55 ($194,273.97 - $20,370.42).

The Audit staff reviewed the Committee's allocation worksheets regarding Iowa direct mail costs and noted purposes such as postcards announcing town meetings, Iowa newsletters, announcement letters, etc.

For New Hampshire, the Audit staff was able to verify $129.50 of the $43,877.56 excluded by the Committee. In addition, the Committee includes an adjusting journal entry in the amount of $(6,418.91) for which no support has been provided. Therefore, the Audit staff was unable to verify $43,748.06 of the $43,877.56 excluded by the Committee for New Hampshire ($43,877.56 - $129.50). The Audit staff applied a 100% fundraising allocation

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to the $129.50 of direct mail costs which contained a fundraising appeal resulting in a credit of $129.50 for items not allocated 100% by the Committee. The adjusted unverified New Hampshire total is $43,618.56 ($43,748.06 - $129.50).

The Committee was provided copies of workpapers in support of the auditors' figures.

The Committee's response to the Interim Audit Report includes explanations and documentation related to Iowa direct mail costs which the Committee believes documents a 50% fundraising exemption for several items noted as unverified by the auditors.

Based on our review of this information, the Audit staff has determined that of the $173,903.55 noted as unverified Iowa direct mail costs, $121,967.77 of these costs contained a direct fundraising appeal. Included in this amount is postage which as a result of material submitted can be associated with a particular solicitation. Included in this amount is postage which as a result of documents submitted can be associated with a particular solicitation. The remaining $51,935.78 ($173,903.55 - $121,967.77) is still unverified and is allocable to the Iowa state limit.

The Committee's response did not address the $43,618.56 of unverified New Hampshire direct mail costs and therefore $43,618.56 is allocable to the New Hampshire state limit.

It should be noted that the Audit staff applied 100% of the direct mail costs which contained a fundraising appeal to exempt fundraising, as opposed to the 50% requested by the Committee.

3. Allocation of Intra-State Phone Calls Paid for With Telephone Credit Cards

Section 106.2(a)(1) of Title 11 of the Code of Federal Regulations states, in part, that expenditures incurred by a candidate's authorized committee(s) for the purpose of influencing the nomination of that candidate for the office of President with respect to a particular State shall be allocated to that State.

The Audit staff reviewed Committee headquarters telephone bills from April 1987 through March 1988 to determine the total amounts of intra-state phone calls made in Iowa and New Hampshire which were charged on Committee telephone credit cards. The Committee did not allocate these intra-state calls to the appropriate states. No explanation for this omission was provided by the Committee.

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The total of intra-state calls, adjusted for the 10% compliance and 10% fundraising exemptions, are as follows:

Iowa	$23,280.46
New Hampshire	$ 1,696.44

In the Committee's response to the Interim Audit Report, the Committee states that they agree with these allocations.

4. Phone Bank Operations

Section 106.2(a)(1) of Title 11 of the Code of Federal Regulations states, in part, that expenditures incurred by a candidate's authorized committee(s) for the purpose of influencing the nomination of the candidate for the office of the President with respect to a particular State shall be allocated to that State. An expenditure shall not necessarily be allocated to the State in which the expenditure is incurred or paid.

Section 110.8(c)(2) of Title 11 of the Code of Federal Regulations states that for State limitations, expenditures for fundraising activities targeted at a particular State and occurring within 28 days before that state's primary election, convention or caucus shall be presumed to be attributable to the expenditure limitation for that State.

The Committee had a phone bank operation located in Kansas City, Kansas from July 1987 through February 1988 and another in Wisner, Nebraska from October 1987 through February 1988. The auditors requested copies of the phone bank scripts but the Committee never provided them.

Kansas City Phone Bank

The Audit staff reviewed U.S. Sprint telephone invoices which contained 42,544 phone calls from the Kansas City phone bank, of which 5,587 (13%) were calls made to Iowa telephone numbers. The total cost of the Iowa calls was $1,054.80. Calls made to New Hampshire were determined to be immaterial.

To derive the Iowa share of the other related phone bank costs, the Audit staff applied the 13% (Iowa percentage) to the other cost categories on the phone bills: Federal Excise Tax, Features Federal Taxes, Wats Equipment Charge and Volume Discount. The total Iowa share of these costs is $73.01. The 13% was then applied to Rent, Salaries, and Reimbursements related to the phone bank. These costs were also adjusted for the 10% compliance and 10% fundraising exemptions. The total Iowa share of these costs is $2,328.30. The total Iowa portion of the Kansas City phone bank is therefore $3,456.11 ($1,054.80 + $73.01 + $2,328.30).

The Committee did not allocate any of the costs associated with the Kansas City phone bank to Iowa. At the exit

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conference, the Treasurer stated that the Kansas City phone bank was set up to influence the entire country and therefore, the costs are not allocable to Iowa. He cited 11 C.F.R. §106.2(b)(2)(v) which states that expenditures for telephone calls between two States need not be allocated to any State.

The Committee was provided with copies of workpapers in support of the auditors' figures at the exit conference.

In the response to the Interim Audit Report, the Committee stated that they agreed with the Audit staff's allocation of $73.01 to Iowa as the Iowa share of the other related Kansas City phone bank costs. They also agreed with the allocation of $2,328.30 to Iowa as the Iowa share of Rent, Salaries and Reimbursements related to the Kansas City phone bank.

However, the Committee did not agree with the allocation to Iowa of $1,054.80 of Iowa telephone call charges made from the Kansas City phone bank. The Committee cited 11 C.F.R. §106.2(b)(2)(v) which states that expenditures for telephone calls between two states need not be allocated to any state. The Committee asserted that "DFP fails to see how such plain language can be interpreted in any way except to exempt toll charges from state allocation."

The Committee added that they did not find any language in the Regulations or appropriate Explanations and Justifications, as cited by the auditors in the Interim Audit Report, that refuted the "plain meaning" of 11 C.F.R. §106.2(b)(2)(v).

The Committee also cited 11 C.F.R. §106.2(b)(1) which states that unless otherwise specified under 11 C.F.R. §106.2(b)(2), an expenditure incurred by a candidate's authorized committee(s) for the purpose of influencing the nomination of that candidate in more than one state shall be allocated to each state on a reasonable and uniformly applied basis. The Committee then noted that "[i]n case anyone wonders if the toll charges involved here qualify as an 'expenditure' for interstate calls, it should be noted that DFP paid the cost of these calls directly and that no third party was involved.

The Committee Treasurer additionally quoted the Explanation and Justification from the February 4, 1983 Federal Register which states that "Subsection (b)(2)(v) sets forth a new method for allocating telephone charges other than base service charges. All calls made within a particular State must be allocated to that State. Calls made between two States, whether or not using toll free service, are exempted from allocation." He added that the phrase "are exempted from allocation" was simple to understand. The Committee Treasurer continued that "[i]n the 1987 rewrite of many of the state allocation regulations the Commission again states that '[i]nter-state calls remain exempt from

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allocation under paragraph (b)(2)(v).'" He added that "I again do not see any meaning beyond what that simple statement states" and that "[t]he Commission specifically considered the exemption and chose not to change the language."

A similar issue arose in the audit of the 1984 presidential campaign of Senator John Glenn. In that case, the Final Audit Report stated that the interstate telephone call exemption was designed to eliminate the problems of trying to allocate telephone calls between offices of a campaign committee. Eventually, the dispute over these costs went to litigation. John Glenn Presidential Committee v. FEC, 822 F.2d 1097 (D.C. Cir. 1987). The Commission maintained that the regulation only applies when an expenditure is directed at attracting voters in more than one state. The court accepted this as a "rational explanation of the Commission's regulations." 822 F.2d at 1102. Since Iowa voters alone were the objectives of the telephone expenses, the court held that the "Commission reasonably concluded that the governing prescription was contained in 11 C.F.R. §106.2(a)(1)." 822 F.2d at 1102.

Since the telephone calls from the Kansas City phone bank were not exclusively targeted to Iowa, the Commission has determined that the $1,054.80 of telephone charges for calls made to Iowa are not allocable to the Iowa spending limitation. However, the $2,401.31 ($73.01 + $2,328.30) of other costs associated with the Kansas City phone bank are allocable to Iowa. In their response to the Interim Audit Report, the Committee agreed with this allocation.

Nebraska Phone Bank

The Committee had a phone bank operation in Wisner, Nebraska.*/ The Audit staff reviewed the Great Plains Communication telephone invoices which contained 445,914 toll calls. Of these calls 338,675 (75.95%) were calls made to Iowa phone numbers. The cost of these Iowa calls was $106,612.38.

To derive the Iowa share of the other related phone bank costs, the Audit staff applied the 75.95% (Iowa percentage) to the other cost categories on the phone bills: Equipment Charges, Federal Tax, Volume Discount and Telephone Facility Fee. The total Iowa share of these costs is a credit of $(2,452.73). The 75.95% was then applied to Salaries and Overhead Costs related to the phone bank. These costs were adjusted for the 10% compliance and 10% fundraising exemptions. The total Iowa share of these costs is $64,634.96. The total Iowa portion of the Nebraska phone bank is therefore $168,794.61 ($106,612.38 + $(2,452.73) + $64,634.96).

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*/ Wisner, Nebraska is located in northeast Nebraska about 40 miles from the Iowa border.

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During the fieldwork the Committee Treasurer stated that they allocated phone bank salaries and overhead costs to Iowa but that the telephone calls made from the phone bank to Iowa were not allocated to Iowa because they were considered interstate calls and therefore not allocable pursuant to 11 C.F.R. §106.2(b)(2)(v).

At the exit conference the Treasurer reiterated that in his opinion, calls from Nebraska to Iowa were not allocable to Iowa and the Committee had complied with the regulations. The Audit staff explained that in our opinion, the phone bank was set up primarily to target Iowa and therefore all calls to Iowa are allocable to Iowa.

Based on the rationale as set forth above, the Commission has determined that since telephone calls from the Nebraska phone bank were not exclusively targeted to Iowa, the $106,612.38 of telephone charges for calls made to Iowa are not allocable to the Iowa spending limitation. Since the Committee allocated $64,136.94 in non-telephone costs to Iowa from the Nebraska phone bank, the Audit staff concludes that a credit in the amount of $(1,954.71) ($64,634.96 + ($2,452.73) - $64,136.94) should be applied to the Committee's Iowa allocations.

Conclusion

The Committee agrees with the Audit staff's additional allocation related to the Kansas City phone bank for costs associated with the phone calls made to Iowa. After the deletion of the Iowa phone calls, the allocation to the Iowa spending limitation for the Nebraska phone bank is overstated by a similar amount. The resulting change to the existing allocations is immaterial.

5. New England (NE) Regional Office

Section 106.2(b)(2)(iv)(B) of Title 11 of the Code of Federal Regulations states, in part, that except for expenditures exempted under paragraph (c) of this section, overhead expenditures of a committee regional office or any committee office with responsibilities in two or more States shall be allocated to each State on a reasonable and uniformly applied basis. For purposes of this section, overhead expenditures include but are not limited to, rent, utilities, office equipment, furniture, supplies and telephone service base charges.

Section 106.2(a)(1) of Title 11 of the Code of Federal Regulations states, in part, that in the event that the Commission disputes the candidate's allocation or claim of exemption for a particular expense, the candidate shall demonstrate, with supporting documentation, that his or her proposed method of allocation or claim of exemption was reasonable.

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The Committee maintained an office in Manchester, New Hampshire which they treated as a regional office for six states in New England. The six states, along with the Committee's allocation percentages, and their respective primary/caucus dates are as follows:

New Hampshire (60%)	2/16/88
Massachusetts (20%)	3/08/88
Maine (5%)	2/26/88
Vermont (5%)	3/01/88*/
Rhode Island (5%)	3/08/88
Connecticut (5%)	3/29/88

The Committee Treasurer stated that the allocation percentages were developed in the Fall of 1987 and were based on a weighted average of anticipated hours to be worked by "regional" staff persons on each of the six states. The Audit staff asked if any adjustments to these percentages were made by the Committee during the operation of the regional office or after it ceased to exist to reflect actual experience. The Treasurer responded that no adjustments were made.

A request was made by the auditors that the Committee provide any planning documents used for the set-up and operation of the Manchester office as the NE Regional Office. The Committee Treasurer stated he would attempt to locate any documentation related to the planning of the regional office.

In an attempt to evaluate the reasonableness of the Committee's allocation of the Manchester office as the NE Regional Office, the auditors performed a number of analyses to identify the activities which related to the states involved.

a. Review of Payroll and Overhead Costs

A review was performed to identify payroll and overhead costs which the Committee allocated directly to the six states. With this information, a determination was to be made as to the extent the Committee offices located in the NE Region functioned autonomously.

The Committee allocated $123,550.54 of payroll costs (Salaries**/ - $43,937.39, Consultants - $79,613.15) directly to the six states whereas $86,348.36 of payroll was allocated to the NE Region. In addition, the Committee allocated $110,810.51 of overhead costs directly to the six states whereas $86,668.67 of overhead was allocated to the NE Region. Categories of overhead costs include Telephone (Intra-state), Rent/Utilities, Supplies and Equipment (see Attachment 1).

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*/ Non-binding Primary. Republican Caucus - 4/26/88.

**/ Includes FICA calculations as determined by auditors.

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The Audit staff noted that of the $43,937.39 in salaries allocated directly to the six states by the Committee, $-0- was allocated directly to New Hampshire. Massachusetts received the largest portion - $37,085.69. Of the $79,613.15 in consultant fees allocated to the six states, only $15,313.55 was allocated directly to New Hampshire by the Committee. Therefore, direct charges to New Hampshire represent only 12% of salaries and consulting fees direct charged to the States within the region.

The Audit staff further noted that of the $110,810.50 allocated to the six states for the overhead categories, only $15,241.11 (or 14%) was allocated directly to New Hampshire by the Committee. Massachusetts again received the largest portion - $56,052.93 (or 51%).

It is the opinion of the Audit staff that based on the Committee's direct allocations of payroll/overhead to the NE Region states, the Committee had independent offices in all these states but did not acknowledge an office for New Hampshire. For example, the Committee made direct allocations to New Hampshire of payroll and overhead in the amount of $30,554.66, compared to Massachusetts - $107,383.62, Maine - $28,574.47 and Vermont - $35,838.79. The primary dates for Massachusetts, Maine and Vermont were 3/8/88, 2/26/88 and 3/1/88 respectively, whereas the New Hampshire primary was held on 2/16/88 and is traditionally the most significant primary in the region.

b. Review of Staff Vendor Files

The Audit staff reviewed all available vendor files and travel reimbursement documentation for Committee staff whose salaries or consulting fees were included in the payroll costs allocated to the NE Region by the Committee. A determination was attempted as to whether these employees appeared to be performing "regional" activities or activities associated with just one of the states.

Of the five staff persons whose salaries were allocated to NE Region, four of them traveled extensively for the Committee. However, these four persons only left New Hampshire occasionally and no trips to the other states were documented after October 24, 1987. The Audit staff noted that many of these trips were to Boston, Massachusetts for staff training and staff meetings. The available documentation did not indicate any training or meetings occurring in New Hampshire. The fifth person apparently did not travel. Because of the nature of the available documentation, the Audit staff was unable to determine the assignments or projects these persons were involved in during their employment with the Committee.

The Regional Director for the New England Region worked out of the Committee's headquarters in Washington, D.C. after 6/1/87. His consulting fees were allocated 100% to Fieldstaff - Consultants (i.e., National Operations). A review of

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his vendor files revealed that he traveled from D.C. to New Hampshire frequently for short visits and occasionally visited the other NE states. Again, no documentation was available to determine the projects he worked on.

Of the three staff persons whose consulting fees were allocated to the NE Region, one was the Executive Director for the Massachusetts state office. A review of his vendor files did not show him leaving Massachusetts while employed by the Committee. The Committee originally allocated his $18,500 in consulting fees to NE Region but later adjusted it by reclassifying $15,500 of these fees to Massachusetts.

The second consultant, who was a resident of Vermont, was the Executive Director for the Vermont office and the only staff person for the Maine office. He primarily traveled in Vermont and Maine with a few trips to New Hampshire. The Committee originally allocated his $15,500 of consulting fees to NE Region but later reclassified $14,000 of these fees to Vermont.

The third consultant performed computer services from 8/9/87 through 2/27/88. Because she was a Manchester, New Hampshire resident and had no travel reimbursements, the auditors concluded that she worked at the Manchester office. This person received eight checks from the Committee for her services - five were allocated to NE Region - Equipment ($1,522.50, 8/9/87-11/14/87), one was allocated to New Hampshire - Consultants ($457.50, 11/15/87-12/19/87), one was allocated to NE Region - Consultants ($365.00, 12/20/87-1/31/88) and the final one was allocated to New Hampshire - Consultants ($142.50, 2/1/88-2/27/88). The auditors were unable to identify the projects she worked on from the available documentation.

c. Review of Committee's NE Region Allocations

The auditors performed a review of the available supporting documentation for all the Committee's allocations to the NE Region account codes to evaluate the allocations. Direct allocations by the Audit staff to the six states was undertaken based on our review of the vendor files (see Attachment 2).

Based on our review of the information made available, it is the opinion of the Audit staff that the Committee has not demonstrated that the office in Manchester, New Hampshire functioned as a regional office. Therefore, the Audit staff has determined that the $150,506.55 of costs allocated to the NE Region by the Committee are allocable to New Hampshire. Since the Committee has allocated 60% of this total to New Hampshire through its regional allocations, the additional allocation to New Hampshire is $54,341.62, determined as follows:

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Audit Allocations to New Hampshire	$150,506.55	
Additional Portion to New Hampshire	x .40	
		60,202.62
LESS: Audit Allocations of New England Regional Expenses to Other 5 NE Region States	9,768.33	
Overallocated % to New Hampshire	x .60	
		(5,861.00)
Additional New Hampshire Allocation		$54,341.62

d. Committee Comments

At the exit conference the Committee Treasurer stated that control of the offices in the other NE states was from the office in Manchester, New Hampshire and that expenses allocated directly to these states does not preclude the use of percentage allocations in a regional office concept. The former Treasurer stated that the "regional" office in Manchester remained open after the New Hampshire primary (2/16/88) which he believes supports their regional allocations. It appears from the auditors review of the vendor files that the NE Region's salaried employees were paid for the last time on 3/2/88 for the period 2/16/88-2/29/88, or one pay period after the New Hampshire primary. No records were available to show the duties of the NE Region office or employees.

At the exit conference, the Committee was provided with copies of work papers in support of the auditors' figures.

In the Committee's response to the Interim Audit Report, the Committee Treasurer explains that "[a]t the beginning of the campaign, DFP knew that a number of New England states would have early electoral tests of one sort or another" and that "[b]ecause of this, it was important that we utilize our resources in the months leading up to the various tests so as to maximize our success."

The Committee Treasurer states that in June of 1987, the Committee reviewed its staffing needs for the six New England states and they determined to set up a regional office in New Hampshire. He further states that "...the decision was, in some part, made with the beneficial affects it would have on the spending limit problem" but that "the decision was primarily made

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because of the understanding that the region's top people would necessarily spend most of their time in New Hampshire and therefore that state made the most sense to host a regional office."

He continues by stating that "[o]nce a decision was reached to place a regional office in New Hampshire, staff was asked to review the duties of the five New England staff people and make a determination of how much time each was expected to spend on New Hampshire versus the other New England states over the next several months as a whole. For any given week the time actually spent on one state or another might be different but I thought it appropriate to have an allocation formula based on the entire campaign rather than adjust it from one week to the next."

The Committee provided a copy of a memo dated June 23, 1987 in which the Treasurer points out that with the exception of the 70% estimated for the New Hampshire Executive Director, all employees were estimated to spend 40% of their time on New Hampshire (see Attachment 3). The Committee Treasurer states that "[g]iven the extreme doubt with which I knew the auditors would view a regional office, I set the regional allocation to 60% for New Hampshire, 20% for Massachusetts and 5% for the other four states." The Committee also provided a New England Regional Committee newsletter from November 1987 which contains articles regarding the Committee's regional approach to the New England states (see Attachment 4).

The Committee takes exception to the Audit staff's analysis of the direct costs to the other NE Region states. They state that "[t]he fact that DFP chose to have a regional office does not preclude it from having offices in the states covered by that regional office. That would be like saying that because we had a national office, we shouldn't have offices in the field. Of course we had significant direct costs in the states outside of New Hampshire, we were trying to win everywhere."

The Audit staff contends that based on our analysis of direct costs allocated to the NE Region states that it appeared that the Committee had independent offices in the five states other than New Hampshire. Since the direct costs allocated to New Hampshire were minimal, the "Regional Office" more closely resembled a New Hampshire state office than a regional office.

The Committee points out that the Audit staff notes that $173,017 of payroll/overhead was allocated to the NE Region but that the Audit staff does not acknowledge that 60% of that figure was allocated to New Hampshire via the NE Region allocations. This 60% allocation is acknowledged in several places in the interim audit report. They add that they believe that a state with a regional office would have little in direct costs but would have the lion share of regional costs, which they point out is supported by the auditors' figures.

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The Committee also contends that the Audit staff does not mention that the Committee paid $700 in January for another office in Manchester, New Hampshire and over $3,000 for space it took over from the Haig Committee, which was all allocated directly to New Hampshire. They add that as in the other states, the Committee had space dedicated directly to New Hampshire. The Audit staff points out that the Committee paid $1,400 on November 30, 1987 to the same vendor that the $700 was paid to in January 1988. This $1,400, for one month's rent plus a $700 security deposit, was allocated to the NE Region. Also, of the $3,013.66 paid to the Haig Committee in February 1988; $66.66 was for rent, $47 was for utilities and $2,900 was for the purchase of yard signs.

Therefore, office rent allocated by the Committee directly to New Hampshire totalled only $766.66. Contrary to the Committee's assertion, these expenses, which they direct charged to New Hampshire, were taken into account by the Audit staff as illustrated by Attachment 1, which was also attached to the interim audit report. Available documentation does not allow a determination to be made regarding that portion of NE Region rent expense which relates solely to New Hampshire.

In the Committee's response, the Treasurer states that he was confused by the $150,506.55 figure on page 21 of the Interim Audit Report. This figure was the portion of costs allocated to the NE Region by the Committee which the auditors determined, from a review of the available supporting documentation, was allocable to New Hampshire.

The Committee also takes exception with the Audit staff's statement that the New Hampshire primary is traditionally the most significant primary in the region. The Committee states that they are not claiming that New Hampshire was unimportant and that the 60% allocation reflects this belief.

The Committee further states that if the Audit staff does not believe the allocation formula was reasonable then the Audit staff should provide the Committee with the allocation formula it deems as reasonable. Without documentation in support of the programs, activities and staff assignments involving the six states deemed NE Region states by the Committee, the Audit staff is unable to determine an allocation formula. If these materials had been provided by the Committee to the Audit staff when requested during the fieldwork and again in the Interim Audit Report, the Committee's allocation formula could have been reviewed for reasonableness or an alternative could have been proposed once it had been demonstrated that the Manchester office was actually a regional office.

The Audit staff concludes that, based on available information, the Committee's Manchester, New Hampshire office functioned primarily as the New Hampshire office. As noted above, the New Hampshire primary is traditionally the most significant

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primary in the region. The Committee acknowledges this in their response to the interim audit report and notes that their 60% allocation of the NE Region to New Hampshire reflects the State's importance. The Audit staff also believes that 60% is conceivably a reasonable allocation of any regional expenses incurred by the Committee. As noted in the Interim Audit Report and discussed above (Page 20), the Committee allocated no salary and relatively small amounts of consulting and overhead directly to New Hampshire (see Attachment 1). For the majority of expenses related to the New Hampshire office, the Committee does not distinguish between expenses which were incurred for their New Hampshire campaign and those which may have been "regional". Rather, the regional expense allocation was applied to the total of these two types of expenses. This point is demonstrated by Attachment 3. In this memorandum, the Committee makes estimates of the portion of certain individuals' time that would be dedicated to New Hampshire versus regional work.*/ However, when the allocations were done, rather than applying the regional allocation formula to the regional portion of these salaries, it was applied to the sum of the New Hampshire and regional portions. No documentation is available to allow the Audit staff to determine the regional versus New Hampshire portions of the expenses associated with the NE Region. Finally, it is noted that when all salaries, overhead and other expenses for the states in the NE Region are taken together, the Audit staff's New Hampshire allocation represents only 46% of the total.

No changes have been made to the Interim Audit Report allocations.

6. Compliance Exemptions - Media Costs

Section 106.2(B)(2)(i)(B) states that expenditures for radio, television and similar types of advertising, including any commission, purchased in a particular media market that covers more than one State shall be allocated to each State in proportion to the estimated audience. It further states that the allocation shall be done using industry market data.

Section 106.2(c)(5)(i) of Title 11 of the Code of Federal Regulations states, in part, that exempt compliance costs are those legal and accounting costs incurred solely to ensure compliance with 26 U.S.C. 9031, 2 U.S.C. 431 AND 11 C.F.R. Chapter I, including the costs of preparing matching fund submissions. The costs of preparing matching fund submissions shall be limited to those functions not required for general contribution processing.

Section 441d(a)(1) of Title 2 of the United States Code states that whenever any person makes an expenditure for the

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*/ No information is available to determine if these estimates proved to be accurate.

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purpose of financing communications expressly advocating the election or defeat of a clearly identified candidate, or solicits any contribution through any broadcasting station, newspaper, magazine, outdoor advertising facility, direct mailing, or any other type of general public political advertising, such communication, if paid for and authorized by a candidate, an authorized political committee of a candidate, or its agents, shall clearly state that the communication has been paid for by such authorized political committee.

The Committee applied a 10% compliance exemption to their media costs which according to the Committee treasurer represents the costs incurred for including the disclaimer notice required by 2 U.S.C. §441d(a) on broadcast media. The amounts exempted by the Committee were as follows:

Iowa	$16,061.46
New Hampshire	$13,961.15

The Audit staff disagrees with the Committee's application of compliance exemptions to their media costs.

The cited regulations on media allocation make no provision for a compliance allocation. Further, the definition of a compliance cost speaks in terms of cost solely to ensure compliance. The section goes on to explain one category of expense where an incremental cost analysis is used to determine which costs will be considered solely to ensure compliance. Though not contemplated by the regulation, if a similar analysis was attempted on media, the incremental cost would appear to be at the production stage rather than for air time. Production costs need not be allocated to any state.

Some exceptions to the "solely to ensure compliance" test have been provided by Commission regulations. These relate to salary and overhead costs for both state and national headquarters operations. Percentages are given for compliance deductions for these categories of expenses. These exceptions are, however, very specific and narrowly drawn and do not cover broadcast media.

At the exit conference, the committee treasurer referred to advisory opinion 1988-6 which allowed the allocation of 50% of media air time costs to fundraising if a request for funds as short as 3 seconds occurred. The Audit staff does not believe that a deduction for compliance is analogous. First, the advisory opinion notes that ads have two purposes, the raising of funds and influencing of voters. The required notice does not add a third reason for running the broadcast, but is required as a condition of accomplishing one or both of the two campaign purposes. Second, to qualify for a fundraising exemption, 11 C.F.R. §100.8(b)(21) requires that expenditures need only be "in connection with the solicitation of contributions" while to qualify as a compliance expense, 11 C.F.R. §100.8(b)(15) requires

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that expenditures be "solely to ensure compliance."

At the exit conference, the Committee was informed of the Audit staff's position. No documentation supporting the Committee's application of a 10% compliance exemption to broadcast media costs has been provided.

In the Committee's response to the Interim Audit Report, the committee reiterates that they incurred costs to air the required disclaimer. They further state that "[w]hether or not DFP would have incurred such costs in any event is, at best, difficult to determine. DFP believes 10% was reasonable, the auditors did not."

Since the Committee did not provide any documentation in support of their application of a 10% compliance exemption to broadcast media costs, no adjustment will be made to the auditors' allocations for the compliance exemptions related to media costs.

7. Broadcast Media

Section 106.2(b)(2)(i)(B) of Title 11 of the Code of Federal Regulations requires that expenditures for radio, television and similar types of advertisements purchased in a particular media market that cover more than one State shall be allocated to each State in proportion to the estimated audience. This allocation of expenditures, including any commission charged for the purchase of broadcast media, shall be made using industry market data.

The Committee contracted with Multi Media Services Corporation (MMSC) to provide media placement services and they contracted with Ringe Media, Inc. (RMI) to provide media planning and production.

The Audit staff reviewed all available radio and television station invoices to determine if Committee allocations to Iowa and New Hampshire were reasonable. The reasonableness of the allocations was tested by referring to the Arbitron television market share percentages and the Arbitron Ratings Radio Station Reference Report (1987 edition).

The major difference between the Committee's media allocations and the allocations determined by the Audit staff was due to the auditors' use of the Arbitron Radio book for New Hampshire. At the exit conference, the Treasurer stated that he was unaware of the existence of this book. The Committee had used the television percentages for their radio allocation which for New Hampshire resulted in a much lower allocation figure.

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The allocation figures for broadcast media are as follows:

	Audited	Committee	Difference
Iowa	$163,210.60	$160,614.62	$ 2,595.98
New Hampshire	176,907.39	139,611.50	37,295.89

Therefore, the additional allocations are $2,595.98 and $37,295.89 to Iowa and New Hampshire respectively.

The Committee was provided with copies of work papers in support of the auditors' figures.

The Committee agrees with the Audit staff's additional allocations regarding broadcast media.

8. Media Commissions (Production)

The Committee paid RMI a commission equal to 1.5% of gross air time costs for all placements of commercials produced by RMI. This was in addition to the 4% commission paid to MMSC for commercials placed and a $40,000 monthly fee paid to RMI. No allocations were made by the Committee to Iowa and New Hampshire for the 1.5% commission paid to RMI. At the exit conference the Treasurer stated that the RMI commissions were considered production costs and therefore not allocable to the state limits pursuant to 11 C.F.R. §106.2(c)(2). However, the auditors contend that the amount of these fees was dependent on the usage of the commercials and was therefore directly related to air time.

The following amounts were allocable:

Iowa	$177,642.75 x 1.5% = $2,664.64
New Hampshire	$199,205.42 x 1.5% = $2,988.08

In the Committee's response to the Interim Audit Report, the Committee takes exception to these allocations. They state that "...its contract with its media producer (Ringe Media) called for a flat monthly fee plus an additional payment based on the extent we used the commercials he produced." The Committee adds that they do not understand the relevance of the auditors' contention that the amount of these fees was dependent on the usage of the commercials and was therefore directly related to air time. They continue that a producer would receive more funds as the frequency of airing the commercials increased and that they do not know what "directly related to air time" has to do with the fee being considered a production cost.

Although the Committee feels that the 1.5% commissions paid to Ringe Media, Inc. were media production costs and therefore not allocable pursuant to 11 C.F.R. §106.2(c)(2),

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the Audit staff contends that the 1.5% of gross billings for air time paid to RMI is a cost of media placement and like other such costs is allocable to Iowa and New Hampshire.

9. Individuals' Travel and Salary

Section 106.2(b)(2)(ii) of Title 11 of the Code of Federal Regulations states that salaries paid to persons working in a particular state for five consecutive days or more, including advance staff, shall be allocated to each State in proportion to the amount of time spent in that State during a payroll period.

Section 106.2(b)(2)(iii) of Title 11 of the Code of Federal Regulations states that travel and subsistence expenditures for persons working in a State for five consecutive days or more shall be allocated to that State in proportion to the amount of time spent in each State during a payroll period. For purposes of this section "subsistence" includes only expenditures for personal living expenses related to a particular individual traveling on committee business, such as food or lodging.

Section 106.2(c)(5) of Title 11 of the Code of Federal Regulations states that an amount equal to 10% of campaign workers' salaries and overhead expenditures in a particular State may be excluded from allocation to that State as an exempt compliance cost. An additional amount equal to 10% of such salaries and overhead expenditures in a particular State may be excluded from allocation to that State as exempt fundraising expenditures, but this exemption shall not apply within 28 days of the primary election.

The Audit staff reviewed the vendor files related to Committee staff travel in Iowa and New Hampshire to identify travel and salary costs which although allocable were not allocated to these states by the Committee.

This review revealed that expenditures for intra-state travel and subsistence had been incurred by staff persons in Iowa and New Hampshire who were in these states on five or more consecutive days but were not allocated to the states by the Committee. The related payroll costs for these persons was also calculated and included as expenses allocable to these states. The payroll was calculated for the period of time in which these persons were documented as being in these states and was adjusted for the compliance and fundraising exemptions as appropriate.

Based on this review, the Audit staff determined that the following travel and salary cost totals be allocated to Iowa and New Hampshire:

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	Iowa	New Hampshire
Travel	$46,584.43	$51,309.52
Salary	60,793.78	15,039.73
TOTAL	$107,378.21	$66,349.25

The Committee was provided schedules of these travel and salary costs at the exit conference.

In the Committee's response to the Interim Audit Report, they provide arguments on a few of the travel and salary costs allocated to Iowa and New Hampshire by the auditors.

The Audit staff allocated to Iowa the salary of Tom Synhorst (co-Regional Director for Iowa) for paydays from March 13, 1987 through March 1, 1988 (also see Exhibit H). The Committee agrees with the Iowa allocations for the salary payments for paydays January 1, 1988 through February 15, 1988 ($7,059.78). They disagree with the allocation of his 1987 salary payments ($42,867.20) and one salary payment covering the period February 15, 1988 through March 1, 1988 which the Committee notes was after the Iowa caucus ($2,418.98) Salary payments allocated to Iowa by the Audit staff totaled $52,345.96.

The Committee states that for the 1987 salary payments, the auditors need more than a person's position to allocate the costs to Iowa. They add that they do not believe that the auditors have any record of Mr. Synhorst being in Iowa more than four consecutive days and that "[t]his is not because we were being cute and hiding his expenses somehow." The Committee further states that "...in the beginning, Mr. Synhorst was responsible for Kansas, a state DFP placed a great deal of importance in" and that "Mr. Synhorst returned to Washington on a regular and frequent basis." The Committee then states that "Mr. Synhorst may have violated the four day rule at some point of which I am unaware, but I believe the burden is still on the Audit staff to make such a showing."

The Audit staff notes that it included Tom Synhorst's 1987 salary payments as allocable to Iowa because of his position as co-Regional Director for Iowa, because the Committee provided him with an apartment in Des Moines, Iowa from March 1987 through February 1988 and because we were unable to determine from the documentation provided by the Committee the exact dates Mr. Synhorst was in Iowa or when he had returned to his permanent residence in Washington D.C., which he apparently did quite frequently. The auditors did note, from airline

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reservation*/ and expense reimbursement documentation, at least sixteen occasions where Mr. Synhorst appeared to be in Iowa for five consecutive days or more.

As far as the inclusion of the paycheck covering the period February 15 through March 1, 1988, which the Committee disagrees with, the Audit staff notes that we included his salary through the end of February because the Committee paid for the rental of his Des Moines apartment for the month of February. The available documentation for Mr. Synhorst's expenses indicates that he was in Iowa through the date of the Iowa caucus (2/8/88), but that the auditors were unable to determine if he remained in Iowa through the end of February. Based on the Committee's argument, the Audit staff has deleted the $2,418.98 of salary to Tom Synhorst for the February 15 through March 1, 1988 pay period.

The Committee objects to the auditors' allocation of one-fifth of a payment ($597) to Long Lines Limited for airfare which represents Tom Synhorst's share of the payment. He was one of the five Committee officials on the flight. They state that the trip was in April of 1987 and that "[u]nless the auditors have evidence that he had broken the four day rule this charge should be removed." The Audit staff notes that the date of travel was April 14, 1987, that the trip was within Iowa only, and that according to airline reservation documentation for Tom Synhorst, he was in Iowa from April 8 through April 15, 1987. Based on this information, the $597 allocation to Iowa will remain unchanged.

Given that Committee records do not establish Mr. Synhorst's whereabouts, his position with the campaign, and his association with a Committee-provided apartment in Des Moines, the Audit staff made no further adjustments to Mr. Synhorst's salary. When the Commission considered this matter, it was determined that $17,858.87 of his 1987 salary was allocable. This amount is based on the number of days during 1987 that available documentation indicated he was in Iowa for periods of five consecutive days or more. This documentation generally established an Iowa arrival date and an Iowa departure date but did not always account for his whereabouts for each of the days in between.

Next, the Committee disagrees with $15,377.20 in air charter service charges which the auditors have allocated to Iowa. This figure is comprised of amounts from three payments.

The first amount allocated by the auditors to Iowa was $3,448.00 for two flights on February 7, 1988. the first flight was from Omaha, Nebraska to Ft. Dodge, Iowa and included Senator and Mrs. Dole and six other Committee officials and staff. It should be noted that the Audit staff considered this Iowa

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*/ This information shows only reservations not actual flights and does not include travel not arranged by the Committee's travel agency.

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intra-state travel because the entourage attended an event in Glenwood, Iowa prior to flying to Ft. Dodge, Iowa via an Omaha, Nebraska airport. The second flight was from Ft. Dodge, Iowa to Des Moines, Iowa with the same eight persons aboard.

In the Committee's response, they point out that Mrs. Dole was in Iowa from February 7 through 9 (less than five days) and therefore her costs were not allocable. The Audit staff concurs with this statement and therefore backs out her share of these two flights, as well as an additional share for the Committee staff person who accompanied her on these trips. The adjusted total for the first amount is therefore $2,586.00 ($3,448.00 - $862.00).

The second amount allocated by the auditors to Iowa was $6,091.20 for two Iowa intra-state flights for Senator Dole and five other staff members who were in Iowa for at least five days. No change to this amount has been made.

The third amount allocated by the auditors to Iowa was $5,838.00 which, according to the check tissue, was for "air travel E. Dole and staff." The auditors were unable to determine from the Committee's records where this travel occurred, when this travel occurred, and except for Mrs. Dole, who the travelers were.

The Committee provided documentation which demonstrated that this payment was for inter-state travel and therefore not allocable to Iowa. The Audit staff has adjusted the allocable amount to Iowa by $5,838.00.

The Committee further objects to the $5,212.18 in Visa card charges which the auditors have allocated to Iowa. This total is for six charges ($5,128.42) by Senator Dole, for which the transaction dates were 12/29/87 for one item and early February 1988 for the other five items, and one charge by Mrs. Dole ($83.76) with a transaction date of 2/7/88. The 12/29/87 charge by Senator Dole ($72.02) was for a purchase at Radio Shack in Keokuk, Iowa and the other five charges by Senator Dole in early February 1988 were travel-related and were around the February 3 through February 9, 1988 time period he was documented to be in Iowa.

Since Mrs. Dole was documented to be in Iowa from February 6 through February 9, 1988, the Audit staff concurs with the Committee for this item and has deleted the $83.76 from Iowa allocation.

The Committee states that it is confused over the auditors' allocation of charges to New Hampshire related to costs incurred at the Merrimack Hilton.

The Committee made 2 payments to the Merrimack Hilton totaling $9,184.88. The first on August 24, 1987, was a

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deposit for "election night/week." This $4,000 was allocated to New Hampshire by the Committee. The second payment was $5,184.88 made on January 28, 1988 and represents the balance due on the charges. Of this amount, $802.50 was allocated to New Hampshire by the Committee. The amount billed by the Merrimack Hilton includes charges for Senator Dole and Committee staff between February 9 and February 16, 1988. Among these charges are a suite for one week for the Doles ($1,917.44), one staff room ($1,917.44), two rooms for seven nights ($1,168.44), ten rooms for three nights ($2,503.80), use of the grand ballroom ($802.50), and an unspecified charge of $714.76. The Audit staff allocation of $4,221.88 was determined as follows:

Total Payments	$ 9,184.88
Less: Press Filing Room	(160.50)
Committee Allocations	(4,802.50)
Additional Allocation	$ 4,221.88

The charge for the ten rooms for 3 nights is included though the documentation does not indicate who, if anyone, occupied the rooms. This charge is therefore allocable under the general allocation provisions of 11 C.F.R. § 106.2(a)(1). Since no documentation was provided by the Committee to refute the auditors' allocation, the $4,221.88 amount remains unchanged.

10. Non-Travel and Salary

During the review of vendor files the Audit staff noted non-travel and salary costs which were allocable to Iowa and New Hampshire but were not allocated to these states by the Committee. Examples of costs in these categories include meeting expenses, car rentals, telephone, event expenses, and newspaper subscriptions. The Audit staff determined that non-travel and salary costs, which were allocable to Iowa and New Hampshire, totaled $64,008.61 and $34,170.96 respectively.*/

The Audit staff provided schedules of these non-travel and salary costs to the Committee at the exit conference.

Iowa

The Committee objects to the following charges allocated to Iowa by the Audit staff:

*/ These allocable amounts have been reduced due to Polling Expenses having been moved to section 11 below ($16,200.00 in Iowa and $14,697.52 in New Hampshire).

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(a) Southwestern Bell, $379.95

The Committee states that the equipment was sent to Iowa for the announcement tour but did not remain there since it was used by the advance staff after Iowa. The Audit staff notes that since no information was provided regarding how long the equipment was used in Iowa, the $379.95 allocated to Iowa remains unchanged. The invoice date for this equipment was November 24, 1987 so it is possible the equipment was in Iowa for at least two months through the date of the Iowa caucus (2/8/88).

(b) R.G. Dickinson & Co., $72.00

The Committee states that this item was charged to an account which was subsequently allocated to Iowa. The Audit staff concurs and has deleted this item.

(c) RST Marketing, $32,189.33

The Committee provided a sample of the fundraising letter from Senator Chuck Grassley (Iowa) which the auditors agree demonstrates that the costs associated with this mailing are exempt fundraising. Of the $32,189.33 allocated by the auditors, $25,880.86 was related to the Grassley mailing and has been deleted. In addition, since the Committee allocated 10% of the cost of this mailing to the Iowa state limitation ($2,875.65), the auditors have allowed a credit in this amount to Iowa.

The Committee did not provide any information regarding the remaining $6,308.47 paid to RST Marketing, so that amount will remain allocated to Iowa.

(d) Postmaster, $7,076.41

This item was included in the documentation provided to the Committee at the exit conference but was not included in the Interim Audit Report figures. The Committee was provided with the revised documentation shortly after the exit conference.

New Hampshire

The Committee also objects to the following charges allocated to New Hampshire by the Audit staff:

(a) Southwestern Bell, $379.95

For the reasons provided earlier under Iowa for this vendor, the $379.95 allocated to New Hampshire has not been adjusted.

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(b) Manchester Union Leader, $85.80

The Committee states that this charge was for a subscription for the national office. The Audit staff concurs and has deleted this item.

(c) State of New Hampshire, $1,000

The Committee states that they thought filing fees were exempt. The Audit staff contends that the $1,000 filing fee is allocable to New Hampshire.

(d) Thomas Rath, $10,855.25

The Committee states that Mr. Rath was a national consultant who lived in New Hampshire but worked for the national committee. They add that his travel expenses will reflect this and that "[j]ust because someone has his checks mailed to his home in New Hampshire does not mean that New Hampshire is all they knew about."

The Audit staff notes that they reviewed invoices related to Mr. Rath's consulting firm, Rath & Young, and allocated costs, such as telephone conferences, which involved Committee staff known to be New Hampshire campaign personnel. Also included are costs related to any intrastate New Hampshire travel. Overall expenses and adjustment credits noted on each invoice were prorated by the auditors based on the percentage of time determined to be New Hampshire related.

The auditors note that costs not related to New Hampshire were not allocated to New Hampshire, as suggested by the Committee. The total costs allocated to New Hampshire was 41% of the total amount billed.

(e) William Landau, $3,000

The Committee states that this charge was for a van wreck in Massachusetts and that even though New Hampshire was written on the supporting documentation, it occurred in Massachussetts. Since the documentation supports this explanation, this charge has been deleted from New Hampshire allocation.

11. Polling Expenses

Section 106.2(b)(2)(vi) of Title 11 of the Code of Federal Regulations states that expenditures incurred for the taking of a public opinion poll covering only one state shall be allocated to that state.

The Interim Audit Report explained that the Committee made payments totaling $621,435.28 to the Wirthlin Group for polling services. It was further explained that the Audit

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staff reviewed the available documentation related to these payments, but that it was not possible to determine if the Committee's allocation of the expenses to spending limitations was correct because the documentation did not detail the coverage of the polls. The only exceptions were three payments related to Iowa and New Hampshire Focus Groups. These payments total $16,200.00 for Iowa and $14,697.52 for New Hampshire, and were included in Finding II.E.10., Non-Travel and Salary Costs, of the Interim Audit Report.

In the Interim Audit Report it was recommended that the Committee provide documentation related to polls conducted by the Wirthlin Group that would establish in which state the polls were conducted. It was also noted that after the documentation was reviewed additional recommendations may be forthcoming.

In response to the Interim Audit Report recommendations the Committee states that "Iowa was the obvious place to assess national media. The voters were more aware than any other state other than New Hampshire. Calling something an Iowa Focus Group does not mean that the expenditure was intended to influence Iowa voters." The Committee's response also states that one payment of $479.52 was for interstate travel and therefore not allocable. No documentation related to any of the polling expenses was included with the Committee's response.

Subsequent to the receipt of the Committee's response to the Interim Audit Report, the Commission issued subpoenas to both the Committee and the Wirthlin Group requiring the production of the necessary records. The records provided indicate that the Committee conducted two public opinion polls in the State of Iowa and three in New Hampshire. The cost of these polls requires allocation to the state spending limitations.

The records produced also showed that the Committee commissioned one Focus Group in Iowa and two Focus Groups in New Hampshire. The pollster's reports were provided for the Iowa Focus Group and one of the two conducted in New Hampshire. These reports make it clear that the commercials being evaluated were produced specifically for use in Iowa or New Hampshire. They also indicate that the participants in the Focus Groups were all residents of the state involved. Finally, it is noted that both Focus Group reports indicate that the participants were also asked to view commercials being aired by one or more of Senator Dole's opponents. At the time of the Interim Audit Report only one of the two New Hampshire Focus Groups had been identified. The cost of both were included in the allocable amount by the Audit staff. It was also learned that the $479.52 payment, which the Committee states is interstate travel, was travel related to one of the New Hampshire Focus Groups, and as such is allocable.

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A final item identified from the review of the polling records is a $4,000.00 per month retainer paid for the months of January through March of 1988. A prorata portion of this retainer has been allocated to Iowa and New Hampshire by the Audit staff.

The Commission has determined that the Focus Groups and the pro rata share of the monthly retainer are not allocable. The remaining allocable polling expenses are as follows:

	Iowa	New Hampshire
Allocable Polling Expenses	$ 57,486.25	$ 57,578.50
Less:		
Committee Allocations	(35,989.00)	(25,942.00)
Additional Allocations	$ 21,497.25	$ 31,636.50

12. "Testing the Waters" Expenditures Made by Campaign America

Section 9034.4(a)(2) of Title 11 of the Code of Federal Regulations states that even though incurred prior to the date an individual becomes a candidate, payments made for the purpose of determining whether an individual should become a candidate, such as those incurred in conducting a poll, shall be considered qualified campaign expenses if the individual subsequently becomes a candidate and shall count against the candidate's limits under 2 U.S.C. 441a(b).

Section 100.8(b)(1) of Title 11 of the Code of Federal Regulations states, in part, that the term "expenditure" does not include payments made solely for the purpose of determining whether an individual should become a candidate. If the individual subsequently becomes a candidate, the payments made are subject to the reporting requirements of the Act. Such expenditures must be reported with the first report filed by the principal campaign committee of the candidate, regardless of the date the payments were made.

Section 100.7(a) of Title 11 of the Code of Federal Regulations states that a contribution includes a gift, subscription, loan, advance or deposit of money or anything of value by any person for the purpose of influencing any election for Federal office. The term "anything of value" includes in-kind contributions.

The Audit staff reviewed the disclosure reports filed with the Federal Election Commission by Campaign America (CA), a registered multicandidate committee associated with the candidate. The review was intended to determine if any of the activity disclosed by CA appeared to relate to the Presidential

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campaign. A group of transactions were identified from the CA reports which were questioned as possible testing-the-water expenses. A request for the records relating to these transactions was made by the Audit staff and again by the Commission. After both were refused, the requested records were subpoenaed by the Commission.

Campaign America registered with the Commission in March 1978. As background, Attachment 5 shows Receipts, Disbursements and year end Cash On Hand for each year from 1978 through 1988. A significant increase in activity is noted in 1986 and the first quarter of 1987. According to a copy of a newsletter provided by CA Senator Dole is the "Honorary Chairman" of CA.

As noted above, certain records were obtained from CA via subpoena. The records obtained were for the period August, 1986 through April 1987 and included cancelled checks and related invoices for disbursements to vendors and persons shown on CA reports as having an Iowa or New Hampshire address. The Interim Audit Report presented an analysis of the documents obtained along with related activity noted in CA reports. Based on that analysis, the Interim Audit Report concluded that the records indicate the possibility of a "testing-the-waters" campaign by CA on behalf of the Committee. It was also noted that the information obtained was limited to payees with an Iowa or New Hampshire address and therefore omitted many possible "testing-the-waters" disbursements made to payees with addresses outside of those States.

The Interim Audit Report also stated that the disbursements which were considered potential "testing-the-waters" in Iowa total $210,049.41. Of that amount, $173,826.46 was believed attributable to the Iowa spending limitation. In New Hampshire the total was $24,775.11 with $23,329.73 attributed to the spending limitation. It was also noted that for purposes of the review the "5-day rule" as set forth in 11 C.F.R. § 106.2(b)(2)(iii) was not applied because the persons involved were CA personnel not Presidential Committee workers. Though the allocable amounts were stated in the report, they were not included in the preliminary calculation of amounts in excess of the Iowa and New Hampshire spending limitations pending the Committee's response to the Interim Audit Report and the review of additional records.

In the Interim Audit Report it was recommended that the Committee provide all documents associated with disbursements made by Campaign America and/or any state level account, division or committee which relate in any way to Iowa or New Hampshire for the period January 1, 1986 through March 31, 1987.

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In addition, the Committee was requested to provide the following:

1. The script(s) used for the telemarketing program that was conducted in Iowa in October and November, 1986;

2. The follow-up letter(s) used for the telemarketing program that was conducted in Iowa in October and November, 1986; and

3. All documents including, but not limited to invitations, hand-outs, press releases, flyers, transcripts, and speeches which relate to appearances made by Senator Dole in Iowa and New Hampshire.

In a separate letter to CA's Treasurer, the Commission requested that CA provide documents relating to disbursements made by Campaign America in Iowa and New Hampshire in connection with the presidential campaign of Senator Robert Dole that were not previously provided and specifically:

"1. All documents relating to all disbursements made by Campaign America Iowa Division and Campaign America New Hampshire from January 1, 1986, to March 31, 1987. This request includes, but is not limited to invoices, canceled checks, debit memoranda, bank statements, signature cards, and accounting records.

"2. The following documents:

a. the script(s) used for the telemarketing program that was conducted in Iowa in October and November, 1986;

b. the follow-up letter(s) used for the telemarketing program that was conducted in Iowa in October and November, 1986; and

c. All documents including, but not limited to invitations, hand-outs, press releases, flyers, transcripts, and speeches which relate to appearances made by Senator Dole in Iowa and New Hampshire."

In its response to the Interim Audit Report the Committee treasurer states that "DFP strongly, but respectfully, objects to this recommendation. The two are separate committees. DFP is not required to maintain CA's records nor has it maintained such records. As such, DFP is unable to provide any requested records." The Committee provided no further information.

However, Counsel for CA responded to the request for records made of that committee. Though denying any CA disbursements were in connection Senator Dole's presidential campaign, copies of documents, including bank statements invoices and cancelled checks for expenditures relating to Iowa or New Hampshire were provided. In addition, CA provided the script and

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related documents used for the telemarketing program in Iowa; a follow up letter associated with the telemarketing effort, and several documents relating to CA speeches made by Senator Dole in Iowa and New Hampshire.

The conclusions presented below are based on an analysis of the documents provided by CA in response to the request for records, material obtained via subpoena and discussed in the interim audit report, CA and other committee disclosure reports, and Committee records.

a. Iowa

The Audit staff concludes that CA engaged in Presidential testing-the-water activity in 1986 and 1987 and that portions of that activity are allocable to the Iowa spending limitation. Specific programs and types of expenses are discussed below:

i. Telemarketing

The largest single program that CA conducted in Iowa appears to be a telemarketing program which took place in October and November of 1986. According to the telemarketing contract, the phone calls were to begin on October 16, 1986 and be completed by October 30, 1986. The election date was November 4, 1986. The contract stated that people who responded favorably to the survey would be sent a follow-up letter. An additional series of phone calls was added later and were to be completed by November 2, 1986.

The Reports Analysis Division questioned CA about the telemarketing program. In a letter from Judith Taggart, CA Treasurer, dated June 24, 1987 it was explained that this program was "to determine the best means for supporting 1986 state and federal candidates" and "no Iowa candidates were named in this effort, thus the expenditure was general party building." In correspondence, this telemarketing effort is referred to as either Iowa Phone Program, Get Out the Vote Program, or survey.

In a letter from the telemarketing firm to the treasurer of CA, the telemarketing firm noted that "Floyd Brown, your field representative for this region has been extremely helpful in making this survey most successful for Senator Dole." (emphasis added)

The Audit staff reviewed the CA disclosure reports to identify candidates and committees supported by CA between October 16, and November 4, 1986. Only $7,750 was spent by CA in direct support; $3,000 for Federal candidates, $2,500 for State candidates and $2,250 for local party committees. In addition, in-kind disbursements totaling $9,791.98 for the follow-up mailing mentioned in the telemarketing contract were reported to seven state candidates.

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In response to the Commission's request for records associated with the interim audit report, CA submitted additional documentation for the telemarketing program.

An early August 1986 CA internal memorandum states that the purpose of the program would be "To assist Governor Branstad and other state and local candidates in Iowa by conducting a GOTV program featuring the Majority Leader" (emphasis added). Under "outline" the memo states that Republican voters would be called and asked their position on state and local elections, whose endorsement would make them more likely to support the GOP candidates, queried about their attitude on farm policy, and finally, tested on their level of participation. Certain respondents then were to receive a follow-up letter. (See Memorandum at Attachment 6)

Campaign America also submitted what appears to be a proposal from the telemarketing firm. The proposal is addressed to Mr. Tom Synhorst (see discussion of Mr. Synhorst's activity below). Though the proposed program is more ambitious than that carried out, the proposal lists three major objectives:

1. To contact 228,000 Iowans and determine whether the endorsement of each of seven prominent individuals is more or less likely to influence their supporting the Governor in the November election.

2. To record each person's attitude to the above mentioned questions and store this information for future telemarketing based on their response. Those showing a favorable response to a particular individual's endorsement were to be re-contacted within the final weeks before election.

3. To cost effectively provide high quality and accurate survey data that can be utilized throughout the project at the client's discretion. (See Attachment 7).

Included with the telemarketing documents is a copy of the script apparently used in the program. It contains six questions. The first two ask if the respondent supports Governor Branstad and his statewide ticket, and a named Republican candidate for the legislature. The third and fourth questions are the same, but request a first and second choice. The question is which of the listed leaders' endorsement would most likely cause the respondent to vote for a candidate in the 1986 general elections. The list of leaders contains the names of eight Republicans, including Senator Dole, who were, at that time, considered presidential hopefuls. Question five asks for approval or disapproval of the Reagan administration farm policy and question six seeks to determine respondent participation in the election process. Six participation choices are given; General Elections, Republican Primaries, Presidential Caucuses, County Republican Convention, Contributions to Republican Candidates, Volunteer for Candidates. By late October 1986, few of these

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choices would seem to be relevant to the 1986 election cycle. (See Attachment 8).

Two documents showing survey results were provided. The first is on the telemarketing firm's letterhead, dated October 31, 1986, and addresses only questions 3 and 4. The analysis provides "B.D. responders" for each question. (See Attachment 9)

The second document is a computer printout and appears to be a more thorough analysis of the results. The results for questions 3 and 4 are entitled President, 1st and President, 2nd.*/ (See Attachment 10)

It is the opinion of the Audit staff that given the questions asked during this survey and that Governor Branstad appears to be a supporter of Senator Dole (see discussion below of "Agricultural Summit" held in late November 1986 and co-hosted by Senator Dole and Governor Branstad), the primary purpose of this telemarketing effort was testing-the-waters and the costs are allocable to Iowa. Campaign America paid the telemarketing firm $70,859.65 for their services.

In addition to the expenses discussed above, CA paid a Washington area firm $8,010.67 to purchase and edit the Iowa Republican voter tape, print survey cards, print labels, keypunch telephone canvass card data, update the master file with survey data, and print selected "Dole favorable" labels. These costs are also allocable to Iowa. Campaign America also made three payments in early 1987 to this vendor for services described as selecting and printing of Dole favorables; computer tapes of Dole favorable (first choice), Dole favorable (second choice); and selecting and printing labels for persons in selected Iowa counties. These invoices suggest use of the survey data with respect to CA events in Iowa during January and February 1987. The three payments total $979.60 and are allocable to Iowa.

The Committee used the services of this same vendor and made payments to the vendor in excess of $400,000.

Campaign America provided documentation for the telemarketing follow-up letters. The cost of printing and mailing 58,000 letters was $11,091.98. An apparent draft of the letter was submitted. The letter encourages the addressees to vote for Governor Branstad and points out Senator Dole's leadership on agricultural issues. (See Attachment 11)

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*/ On the copy of the telemarketing script provided by CA, Senator Jesse Helms is lsited among the leaders for questions 3 and 4. On the summary of survey results, Senator Helms has been replaced by Alexander Haig.

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Campaign America reported these expenses as in-kind contributions to seven Iowa candidates. The cost of this letter is allocable to Iowa.

The Commission determined that only the telemarketing expenses CA paid to a Washington area firm in the amounts of $8,010.67 and $979.60 are allocable. Attachment 12 is a summary of the telemarketing expenses.

ii. Events

The CA records made available indicate that at least 19 events, speeches, or meetings were held in Iowa between March 31, 1986 and February 23, 1987. These records also indicate that Senator Dole was present for 17 of the events. Though the available records do not establish the nature of all of the events the following items are noted:

- In mid April 1986, CA paid expenses for receptions in Wapello, Iowa. Available records do not establish the attendees or the purpose of the event.
- In early May 1986, Senator Dole and 8 other persons were in Iowa for the Iowa Republican Congressional District Conventions.
- In June 1986, Senator Dole and three others were in Iowa for the Iowa Republican Convention.
- In late July 1986 Senator Dole is shown as the "Special Guest" at a picnic in Atlantic, Iowa sponsored by the Fifth District Republican Party.
- In late August, 1986 Senator Dole and 6 others were in Iowa for the Iowa State Fair. CA paid for a backdrop and flags which were delivered to the fairgrounds.
- In mid September 1986, Senator Dole and three others were in Iowa for "Senator Grassley Birthday Events".
- In mid October 1986, a "Steering Committee Meeting" was held in Des Moines. At least four CA personnel attended.
- In late October 1986 Senator Dole visited at least three cities in Iowa along with six other persons whose expenses were paid by CA.

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- In late November, 1986 Senator Dole and Iowa Governor Terry Branstad hosted a "farm summit" in Des Moines. CA paid travel expenses for Senator Dole and 4 other persons.

- In early December 1986, Senator Dole and three others traveled to Iowa for an address by Senator Dole before the Iowa Sheriff's and Deputies Association.

- In mid January 1987. Senator Dole traveled to Iowa for an address before the Iowa Lumbermens Association. Other documentation submitted suggests that other groups may have been addressed during this time.

- In late January 1987, Senator Dole traveled to Iowa to address the "AGC". The documentation indicates the topics related to the construction industry.

- Campaign America sponsored at least three "Town Meetings" in Iowa. Documentation provided indicates that the events occurred on 2/7/87 in Orange City, Iowa; 2/12/87 in Dubuque, Iowa and 2/22/87 in Des Moines. These events appear to be similar to the events of the same name sponsored by the Presidential Committee. The 2/22/87 Town Meeting occurred after the beginning of the Presidential Committee activity. (The Committee's earliest reported expenditure is 2/10/87 and the Committee's first bank account opened on 2/18/87).

  The invitation postcards were printed by the same Iowa firm who printed the later cards for the Committee. The postcard for the February 22, 1987 town meeting appears to be the same size and format as those used by the Committee, and uses the same photograph of Senator Dole. No samples for the others are available. The postcard for the February 22, 1987 event begins with the message "With the 1986 campaign behind us, Republican voters and candidates clearly have major challenges ahead in 1988. During this meeting I would like to hear your views and concerns while sharing some of my own with you regarding our shared Republican future." A flyer associated with the same printing bill is entitled "Bob Dole on the Issues" and includes a quote from the Washington Times of January 15, 1987 which begins "If Sen. Robert Dole is running for the White House, he's off on the right foot."

  In addition on February 7, 1987 Senator Dole addressed the Iowa Bankers Association in Sioux

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City. In the text of that speech Senator Dole comments "Sioux City is one of my favorite places. In fact, lately, any place in or near Iowa is one of my favorite places." (See Attachment 13, p. 1) In a memorandum dated February 18, 1987 titled "Iowa talking points" under the sub heading "General Objectives of Iowa Talking Points" the following appears:

"Offer Iowans a Friend in the White House. If candidates are confronted with questions: How should your PAST commitments assure Iowans that if you are elected Iowa will have a friend in the White House..." (emphasis in original). (See Attachment 14, p. 4)

- Finally, on February 23, 1987 CA paid for a breakfast for 53 people in Davenport, Iowa. The talking points memorandum noted above begins with a section titled Quad Cities Issues.*/

During the period covered by these meetings and events Senator Dole appears to have made 17 trips to Iowa and visited 18 different cities some repeatedly. The costs associated with these events which are not included elsewhere total $76,403.80 of which $30,268.81 is allocable to Iowa.

The Commission determined that of the events discussed above, only the expenses associated with the three Iowa Town Meetings (2/7/87, 2/12/87, 2/22/87) and the 2/23/87 Breakfast Meeting in Davenport, Iowa are allocable. These expenses total $14,684.35. Attachment 15 includes a listing of events and associated expenses.

iii. Campaign America Iowa Staff

In addition to the Iowa activity discussed above, CA records show a significant staff effort in Iowa during 1986 and early 1987.

- Floyd Brown: Mr. Brown's mailing address is in the Washington D.C. area. Available records indicate that he was on the CA payroll effective mid March 1986 through late February 1987. He was on the Committee payroll effective March 16, 1987 with the title of Regional Director for IL, IN, IA, ND, SD, WI, MN, NE, and MO.

During his employment at CA, records reviewed indicate that Mr. Brown made 29 trips to Iowa of 1 to 6 days in duration. He was in Iowa before and/or during nearly all CA Iowa

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*/ Quad Cities are comprised of the following: Davenport, IA; Bettendorf, IA; Moline, IL; and Rock Island, IL.

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events, trips by Senator Dole and for various meetings with CA Iowa based staff. (See above.) During a number of these trips Mr. Brown paid for his expenses as well as those of other staff persons.

As noted in the discussion of the telemarketing program, a letter from the telemarketing firm in Des Moines refers to Floyd Brown as CA's field representative for that region. In late October he attended a "Steering Committee Meeting" in Des Moines. A note on records relating to a late November, 1986 trip states that he will meet with one of the Iowa CA staff concerning the "90 day plan." It is noted that this trip occurred after the 1986 election and that 90 days from the date of the trip would correspond to the beginning of Committee activity. Mr. Brown's expenses for this trip were paid by CA.

Though Mr. Brown travelled to other states on occasion, it is the opinion of the Audit staff that the records reviewed to date indicate that Mr. Brown's primary focus was on the state of Iowa and that when viewed in light of the other CA activities discussed below, his salary and expenses should be considered testing-the-waters expenditures. Attachment 16 shows Mr. Brown's travel and salary. Payments to Mr. Brown totaled $47,823.40, of which $38,052.40 is allocable to the Iowa spending limitation. (See also Attachment 15 - Events)

As noted above, given that during this time Mr. Brown was not a Committee staff person, no attempt has been made to apply the 5-day rule at 11 C.F.R. § 106.2(b)(2)(iii).

- Tom Synhorst: Mr. Synhorst appears to be the second CA staff person who has a Washington D.C. area address and whose primary focus was in Iowa. Mr. Synhorst received consulting payments of $1,000 per month which appear to cover the period April through December of 1986 and salary for January/February 1987. The earliest expense request noted from Mr. Synhorst is for a trip in January 1987. However, other documents reviewed indicate that he was in Iowa earlier on several occasions beginning in March of 1986. It was also noted that Mr. Synhorst received consulting payments through November of 1986, as well as expense reimbursements, from the 1986 re-election campaign of Iowa Senator Grassley. Given his involvement in that campaign, it seems likely that he visited Iowa earlier in the year 1986 while receiving consulting payments from CA.

It was also noted that Mr. Synhorst held meetings or job interviews with several persons in Iowa. With the exception of one expense reimbursement these persons were not paid by CA, but in at least two cases, worked for the Committee.

The proposal from the telemarketing firm which handled the telemarketing program discussed above was addressed to Mr. Synhorst and dated August 1986.

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Also the postage for the follow up letters associated with the telemarketing program ($5,950.00) was apparently paid by Mr. Synhorst in Des Moines during the later part of October and reimbursed by CA. A memo from Mr. Synhorst apparently faxed from Senator Grassley's office requests checks for postage, printing and mailing. The postage check was made payable to Mr. Synhorst. According to the documentation submitted, the printing and mailing checks were dated October 27, 1986 and were "Federal Expressed" to Mr. Synhorst at Senator Grassley's Des Moines campaign office.

Mr. Synhorst is shown in Committee files as the addressee for telephone and electric bills for the Committee's Des Moines apartment beginning on February 17, 1987 for the electric service and February 13, 1987 for telephone service. Both of these dates are during his employment with CA and before the final CA Town Meeting. Two of his expense vouchers paid by CA in February contain charges for the security deposit and the first rent payment for the apartment. Mr. Synhorst notes that this is where he and the "National Staff" will stay when in Iowa. Mr. Synhorst also submitted an expense reimbursement request to the Presidential Committee dated February 4, 1987 to cover a clipping service. This request was made while he was employed by CA.

Mr. Synhorst is shown on the Committee's staff list as a regional director for Iowa and Kansas.

Mr. Synhorst' salary and expenses total $20,955.78. The amount allocable to the Iowa spending limitation is $17,688.78. As with Floyd Brown, the 5-day rule is not considered to be applicable. A schedule of Mr. Synhorst's activity is at Attachment 17.

In addition to Messrs. Brown and Synhorst, CA retained the services of seven individuals with Iowa addresses during parts of 1986 and early 1987. Each is briefly discussed below.

- Jane Voights: Ms. Voights was employed between mid June and the end of August 1986. She had a telephone in her name which CA paid for and which was referred to as CA's Iowa telephone. Her expenses were for car rentals, meals, mileage, supplies, lodging, stamps, etc. There was one shipping bill which described the contents as "Campaign Literature." The date and location to which the material was shipped corresponds to a late July event in Atlantic, Iowa.

Available records indicate that Ms. Voights was associated with at least four meetings or events in Iowa. One in late June at the time of the Iowa Republican Party convention, a late July event where Senator Dole was to appear, an early August meeting in Des Moines, and an October event in Council

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Bluffs. Consulting fees and expenses for Ms. Voights total $5,049.89. The entire amount is allocable to the Iowa spending limitation. Ms. Voights received no payments from the Committee.

- John Rehmann: Mr. Rehmann was a paid consultant from July 1986 to January 1987. His expense reports indicate meals, telephone, and supplies. Like Ms. Voights he is associated with the late July event where Senator Dole was to appear.

He notes having attended a "strategy committee meeting" on October 22, 1986. He also notes expenses involved with the leasing of office space and gives an approximate location in Des Moines. CA shows no payments for Iowa office space but the Committee's Iowa office was located in the vicinity mentioned by Mr. Rehmann. Mr. Rehmann's consulting and expenses total $3,734.13, of which $3,729.43 is allocable to Iowa.

The Committee paid Mr. Rehmann consulting fees and expenses from mid-December, 1987 to mid-March, 1988.

- Cal Hultman: Mr. Hultman was paid a consulting fee from September 1986 until March 1987 and travel expenses. He notes having attended the October 22, 1986 "steering committee meeting" in Des Moines.

He also is associated with the late October, 1986 event noted above under Jane Voights. Mr. Hultman's fees and expenses total $12,022.61, of which $12,016.00 is allocable to Iowa. The Committee made no disbursements to Mr. Hultman.

- Penny Brown: Ms. Brown was paid a consulting fee for December 1986, and January 1987. She also received expense reimbursements. Available documentation indicates that Ms. Brown was associated with a December 7, 1986 visit by Senator Dole. (See Event listing at Attachment 15) Total payments to Ms. Brown are $5,947.02, of which $4,892.42 is allocable to Iowa. The Committee made no payments to Ms. Brown. Like Mr. Synhorst, Ms. Brown was an employee of the Grassley Committee in 1986.

- Jeff Nelson: Mr. Nelson was paid two consulting payments, one in November, 1986, and one in January, 1987. These payments total $3,500.00 and are considered allocable to Iowa. Mr. Nelson received no payments from the Committee.

- Carol Lehmkuhl: Ms. Lehmkuhl was paid one consulting payment of $1,200 on March 4, 1987. She received her first Committee salary check on April 1, 1987 and was shown by the Committee as the Des Moines Office Manager. Like Mr. Synhorst and Ms. Brown , Ms. Lehmkuhl was an employee of the Grassley Committee in 1986. The $1,200 payment is allocable to Iowa.

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- Wythe Willey: Mr. Willey received one $4,000 consulting fee to cover January and February 1987. He received no payments from the Committee. This payment is considered to be allocable to Iowa.

The Commission determined that only the CA Iowa Staff expenses associated with the three Iowa Town Meetings (2/7/87, 2/12/87, 2/22/87) and the 2/23/87 Breakfast Meeting in Davenport, Iowa are allocable. These expenses total $5,155.31 for F. Brown and T. Synhorst and $5,059.39 for other Iowa based staff. Attachment 18 is a listing of the Iowa staff expenses.

iv. Miscellaneous Iowa Expenses

Finally, there are a number of other Iowa expenses not included in the above categories. These include miscellaneous travel to Iowa, postage for Iowa mailings, charter costs for a trip to Cedar Rapids, and expenses for a December 1986 Washington, D.C. breakfast meeting concerning Iowa telecommunications. These expenses total $3,746.93 of which $3,097.93 is allocable to the Iowa spending limitation. Since none of these expenses are associated with the three Town Meetings or the Davenport Breakfast Meeting, the Commission determined that they are not allocable. (See Attachment 19)

The expenses discussed above indicate that CA engaged in activities in Iowa during 1986 and early 1987 which appear to be for the purpose of advancing Senator Dole's candidacy for nomination for the Office of President. The expenses show a significant staff presence in the State, a series of events and meetings many of which were attended by Senator Dole as well as addresses to various Iowa groups by the Senator. A substantial telemarketing program was undertaken to determine Senator Dole's strength compared to likely Presidential opponents and to identify potential supporters. In 1987, the CA Iowa staff also appear to have been making preparations for the Committee's Iowa effort. It is also noted that Senator Dole was seeking re-election to the Senate from Kansas in 1986.

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A summary of CA's Iowa expenses is shown below:

Category	Iowa Allocable Amount	Iowa Non-Allocable Amount
Telemarketing Program	$ 8,990.27	$ -0-
Events	14,684.35	6,522.50
IA Staff Expenses:		
F. Brown and T. Synhorst	5,155.31	1,476.00
Iowa Based Staff	5,059.39	-0-
Miscellaneous	-0-	-0-
TOTAL	$33,889.32	$7,998.50

b. New Hampshire

Similar to Iowa, CA was active in New Hampshire in the later part of 1986 and early 1987. Though the program appears to be smaller, the types of activity are similar and the conclusion concerning testing-the-waters is the same.

i. Events

Like Iowa, CA held a number of New Hampshire meetings, events or groups of events between March 1986 and February 1987. Available records indicate nine such events and it appears that Senator Dole was in attendance at seven of the nine. Listed below is specific information about these events.

- A meeting and luncheon for 18 people, including Senator Dole, was held in New Hampshire in early March 1986.
- In mid June 1986, Senator Dole and at least 2 other CA staff attended a "Rudman Event" in Manchester, New Hampshire.
- Donald Devine*/ and Paul Russo were in New Hampshire between June 18 and 20, 1986.
- A series of events were held in New Hampshire between August 24 and 29, 1986. Senator Dole was in New Hampshire for the majority of this time. Available records make note of a photo opportunity, a Dole banquet and a luncheon. One expense

*/ According to documents provided by CA, Donald J. Devine was the "Consulting Director" for CA.

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voucher refers to the "Liberty Weekend." In addition to some New Hampshire residents who were reimbursed for expenses, at least 5 others were in attendance including Secretary Dole. A bill from a photographer includes a charge for making a video tape of the Liberty Weekend. A memorandum from Suzanne Niemela notes that money was collected at the door of one event and paid directly to the restaurant. This memorandum also notes that seven checks made payable to the "Dole Committee" were collected and that Ms. Niemela needed assistance in cashing them. She states that "[t]hey should be deposited in the Campaign America PAC or 'Dole Committee' and a new check should be cut for the Greenhouse Restaurant."

° Campaign America paid for a hospitality suite on October 5, 1986 for the "Republican Convention."

° On October 24, 1986, Suzanne Niemela rented a backdrop, podium and public address system for a news conference.

° Between December 11 and 13, 1986, Senator Dole made two trips to New Hampshire. On December 12, food was purchased for a meeting. Also, a meeting room was rented and refreshments for 40 guests were ordered. Records further indicate that Senator Dole addressed the Portsmouth Rotary Club on December 11, 1986 and the University of New Hampshire commencement on December 13, 1986.

° Senator Dole visited two locations in New Hampshire between January 24 and 26, 1987. On January 25, CA paid for brunch for 67 people.

° Senator Dole was in New Hampshire on February 16, 1987 to address the Keene Rotary Club. Campaign America paid for a hospitality suite and refreshments for 90 people and a breakfast for 60 people.

Expenses for these events not considered elsewhere total $25,148.10, of which $16,025.71 is allocable to the New Hampshire spending limitation.

The Commission determined that none of the expenses associated with the events discussed above are allocable. Attachment 20 is a listing of these events.

ii. Voter Lists

The auditors reviewed documentation related to 117 payments, totaling $3,136.26, to various New Hampshire towns for the purchase of Voter Lists. The dates of payments for these lists were between October 16, 1986 and January 29, 1987, although it appears that the initial request was made by letter, signed by Ms. Niemela, on October 3, 1986.

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iii. Telephone Expenses

Campaign America paid for a business telephone in New Hampshire. No record of payments for any office facility is noted in the available records and the documentation provided does not show an address. The telephone bills indicate that the service was maintained by CA between October 1, 1986 and February 24, 1987 at a cost of $2,223.16. Of this amount, $1,381.03 is allocable to the New Hampshire spending limitation. It was also learned that the Committee paid the telephone bill for the same telephone number covering the period February 25 to March 24, 1987.

iv. New Hampshire Staff

Campaign America employed three persons who appear to have worked on the New Hampshire programs.

Paul Russo: Mr. Russo was a Washington area consultant. Campaign America's reports indicate that Mr. Russo received his first consulting payment on April 1, 1986. This payment was likely to cover the month of March, 1986. His first expense reimbursement is reported as a March 12, 1986 transaction. No documentation was submitted by CA for payments made to Mr. Russo before June 1, 1986. In addition, no documentation was submitted for a June 30, 1986 expense reimbursement. Available documentation indicates that between the beginning of June 1986 and the end of August, 1986, all of Mr. Russo's travel was to New Hampshire. No travel reimbursements are reported after the August, 1986 trip. Mr. Russo received his last consulting payment on October 3, 1986.

A copy of a memorandum from Mr. Russo indicates that he had hired Suzanne Niemela (see below) "to work the New England Region for Campaign America, establishing a 'desk' in Concord, New Hampshire." As noted below, Ms. Niemela worked only in New Hampshire. It is also noted that Mr. Russo made a trip to Iowa during the first week of May, 1986.

Mr. Russo's consulting payments for June through August, 1986 are considered to be New Hampshire expenses. These payments total $13,461.12 of which $12,341.63 is allocable to the New Hampshire spending limitation.

The Committee made no payments to Mr. Russo. Attachment 21 is a schedule of the CA payments to Mr. Russo considered to be allocable to New Hampshire.

Suzanne Niemela: Ms. Niemela was hired effective July 1, 1986. On or about August 1, 1986, Ms. Niemela moved from Massachusetts to Concord, New Hampshire. Her moving expenses were paid by CA. Available documentation indicates that with the exception of one trip to the Washington D.C. area, Ms. Niemela worked exclusively in New Hampshire. She received

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consulting fees during the period July 1986 to February 1987 and expense reimbursements covering activity from September 1986 to February 1987. Expenses include phone, travel, supplies, copiers, typewriter rental, etc. Beginning in March 1987, Ms. Niemela received a salary from the Committee and is shown by the Committee under New Hampshire staff - Regional Advance and Scheduling.

Attachment 22 shows CA payments to Ms. Niemela. Payments related to New Hampshire total $17,959.91 with $17,818.26 being allocable to the New Hampshire spending limitation.

Finally, documentation was submitted for a New Hampshire trip made by a Mr. Jim Murphy on February 26 and 27, 1987. The only other payment to Mr. Murphy by CA was a $1,250 consulting payment reported on March 12, 1987. Committee records indicate that Mr. Murphy was to be the Northeast Regional Director. A March 11, 1987 Letter of Agreement between the Committee and Mr. Murphy also notes that he was to be paid $1,250 as a consulting fee for the period March 1, to March 15, 1987. The amount was paid on March 13, 1987. Committee documentation also indicates that Mr. Murphy was expected to live in the Boston area for the duration of the Campaign. On March 11, 1987, Mr. Murphy drove his car to Boston to "Begin Job." Mr. Murphy was later named the head of the Political Field Division and moved to the Washington area. He was on the Committee's payroll effective March 16, 1987. Total payments for Mr. Murphy by CA are $1,590.60 of which $1,417.50 are allocable to New Hampshire.

The Commission determined that none of the expenses associated with the New Hampshire Staff expenses discussed above are allocable. A summary of CA's New Hampshire expenses is shown below:

Category	New Hampshire Allocable Amount	New Hampshire Non-Allocable Amount
Events	$ -0-	$ -0-
Voter Lists	3,136.26	-0-
Telephone	1,381.03	842.13
NH Staff Expenses:		
Niemela/Russo	-0-	-0-
Jim Murphy	-0-	-0-
TOTAL	$4,517.29	$ 842.13

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The expenses discussed above indicate that CA engaged in activities in New Hampshire during 1986 and early 1987 which appear to be for the purpose of advancing Senator Dole's candidacy for nomination for the Office of President. The expenses show a staff presence, a series of political events and an effort to accumulate voter lists.

The Audit staff also learned that Campaign America had committees registered at the state level in both Iowa and New Hampshire. Though both the Interim Audit Report and the request made to CA asked for information on these committees, no information has been provided.

Presented below is an overall summary of the CA activity which is considered testing the waters.

	State Allocable	Non State Allocable
Iowa	$33,889.32	$ 7,998.50
New Hampshire	4,517.29	842.13
Total	$38,406.61	$ 8,840.63
Grand Total	$ 47,247.24	

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13. Recap of Iowa and New Hampshire Allocations

Presented below is a recap of allocable costs to Iowa and New Hampshire.

	Iowa	New Hampshire
Amount Allocated by the Committee	$ 793,230.82	$ 462,462.20
Audit Additions:		
1. Twenty-Five Percent Fundraising Exemption (Travel, Events)	28,450.36	13,997.06
2. Fundraising Exemptions-Direct Mail Costs	51,935.78	43,618.56
3. Credit Card Phone Calls (Intra-state)	23,280.46	1,696.44
4. Phone Banks	-0-	-0-
5. NE Regional Office	-0-	54,341.62
6. Compliance Exemptions-Media Costs	16,061.46	13,961.15
7. Broadcast Media	2,595.98	37,295.89
8. Media Commissions (Production)	2,664.64	2,988.08
9. Travel and Salary Costs	73,161.62	66,349.25
10. Non-Travel and Salary Costs	35,179.99	31,085.16
11. Polling Expenses	21,497.25	31,636.50
12. "Testing-the-Waters" Expenditures Made by Campaign America	33,889.32	4,517.29
Total Allocable Amount	$1,081,947.68	$ 763,949.20
Less: Expenditure Limitation	(775,217.60)	(461,000.00)
Amount in Excess of of the Limitation	$ 306,730.08	$ 302,949.20

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As explained above, the Audit staff has determined that the Committee has exceeded the expenditure limitation in Iowa by $306,730.08 and in New Hampshire by $302,949.20 for a total of $609,679.28. Shown below is the calculation of the amount repayable to the U.S. Treasury as a result of these expenditures in excess of the state limitations:

Amount in Excess of the State Expenditure Limitations	$609,679.28
Times the Repayment Ratio from Finding III.A.	.278907
Repayment Amount	$170,043.82

Recommendation #8

The Audit staff recommends that the Commission make an initial determination that $170,043.82 is repayable to the United States Treasury pursuant to 26 U.S.C. 9038(b)(2).

Repayment Amount: $170,043.82

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ATTACHMENT 5

CAMPAIGN AMERICA - REPORTED RECEIPTS AND DISBURSEMENTS BY YEAR

YEAR	REPORTED RECEIPTS	REPORTED DISBURSEMENTS	CASH AS CALCULATED FROM COLUMNS 1 AND 2
1978	$ 205,096.00	$ 197,395.00	$ 7,701.00
1979	33,905.00	41,522.00	84.00
1980	13,500.00	13,188.00	396.00
1981	-0-	173.00	223.00
1982	285,356.00	251,934.00	33,645.00
1983	846,698.00	269,371.00	610,972.00
1984	426,219.00	585,767.00	451,424.00
1985	417,971.00	390,423.00	478,972.00
1986	2,929,341.00	2,859,148.00	549,165.00
1987	2,417,616.00	2,916,978.00*/	49,803.00
1988	1,363,777.00	1,108,898.00	304,682.00
TOTAL	$8,939,479.00	$8,634,797.00	

*/ Of this amount, $2,088,536.00 was expended between January 1, 1987 and April 30, 1987.

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MEMORANDUM FOR DON DEVINE

FROM: BILL LACY

DATE: AUGUST 8, 1986

SUBJ: IOWA '86 PROJECT

As you know, Iowa is a crucial state for the GOP.

1. Senator Grassley looks o.k., but Governor Branstad is in a fight for his life.

2. Because of the agricultural situation, Iowa has national significance-- heavy GOP losses there would bode ill for realignment and would be a decisive setback for the President's farm policy.

3. Once a solid GOP state, Iowa is turning Democratic. Stopping the slide there in '86 could give us some ideas to apply to slipping GOP midwestern fortunes. To address these concerns, I would like to propose this concept for an Iowa '86 campaign assistance program:

   Purpose: To assist Governor Branstad and other state and local candidates in Iowa by conducting a GO TV program featuring the Majority Leader.

   Background: Midterm turnout is traditionally lower especially when the party in power faces serious economic problems. In 1982, economic circumstances led to large numbers of Republicans voicing their protest by not voting. Similar circumstances exist in Iowa in 1986 because of the farm economy; so it is critical to reach out to low-intensity voters.

   Outline: Republican voters will be called, asked their position on state and local elections, whose endorsement would make them more likely to support the GOP candidates, queried about their attitude on farm policy, and finally, tested on their level of participation.

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Low participation Republicans dissatisfied with farm policies who support the state and local GOP ticket will then be called. A message from Senator Dole urging them to turn out will be delivered. The target group will also receive a letter of endorsement.

In short, we'll use our resources in a carefully targeted way to elect more Republicans in Iowa.

Let me know what you think.

9304095587

PROPOSAL FOR
MR. TOM SYNHORST

August 19, 1986

Objectives

1. To contact approximately 228,000 Iowans and determine whether the endorsement of each of seven prominent individuals is more or less likely to influence their supporting the Governor in the November election.

2. To record each person's attitude to the above mentioned questions and store this information for future telemarketing based on their response. Those showing a favorable response to a particular individual's endorsement will be recontacted within the final few weeks before the election.

3. To cost effectively provide high quality and accurate survey data that can be utilized throughout the project at the client's discretion.

4. A manual system of filing will be used as a back-up to the client's automated system.

5. The project will require a total of nine weeks to complete. the final two weeks before the election will be utilized to contact the people who responded favorably to a particular endorsement.

6. Lewis & Associates will have input and control over the design and layout of the telemarketing cards, as well as other variables affecting efficiency and performance.

Assumptions

The following assumptions are based on several years of experience in similar types of projects. Each figure is conservative and realistic: Lewis & Associates expects to exceed these figures through improvement of performance variables we can control. These assumptions will provide an excellent measure of the maximum time and cost involved to complete this project.

1. Approximately 15 contacts will be completed per telemarketing hour.

2. Approximately 17.5% of the people surveyed will need to be called back shortly before the election because they responded favorably to a particular endorsement.

3. The survey data will be entered into the master file by the client to enable those people who responded a particular way to be sorted, counted and later re-printed on cards for follow-up calls.

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Estimated Costs

The following estimates of the project's cost are based on the assumptions mentioned before. This estimate reflects the maximum cost per contact the client can incur on this project. If Lewis & Associates completes the project in less than the estimated hours, the client will only be charged for actual telemarketing hours rather than the estimated.

228,000	Original contacts
x 17.5%	Favorabe response rate
39,900	Estimated follow-up contact required
228,000	Original contacts
+39,900	Follow-up contacts
267,900	Total estimated contacts required
÷ 15	Contacts per hour
17,860	Telemarketing hours
x 27.50	Cost per telemarketing hour
$491,150	Total estimated cost
$ 27.50	Cost per telemarketing hour
÷ 15	Contacts per telemarketing hour
$ 1.83	Cost per contact

Schedule

August 25-29	Make final preparations for project
September 1	(Week #1) Begin project
September 8	(Week #2)
September 15	(Week #3)
September 22	(Week #4)
September 29	(Week #5)
October 6	(Week #6)
October 13	(Week #7)
October 20	(Week #8) Begin calling favorable responses
October 27	(Week #9) Complete calling favorable responses
November 3	(Week #10) Project completed
November 4	Election Day

The calling hours of the project will be 9:00 a.m. to 9:00 p.m. Monday through Sunday.

IOWA '96 PROGRAM ID SCRIPT

HELLO. MY NAME IS _____ AND I AM CALLING FROM CAMPAIGN AMERICA, A POLITICAL ACTION COMMITTEE. CAN YOU HEAR ME ALRIGHT?

1. WILL YOU BE SUPPORTING THE REPUBLICAN CANDIDATE FOR GOVERNOR, TERRY BRANSTAD, AND HIS STATE-WIDE TICKET?

_____ YES
_____ NO
_____ UNDECIDED

2. WILL YOU BE SUPPORTING _____, YOUR LOCAL REPUBLICAN CANDIDATE FOR THE LEGISLATURE?

_____ YES
_____ NO
_____ UNDECIDED

3. OF THE FOLLOWING LIST OF LEADERS, WHO'S ENDORSEMENT WOULD MAKE YOU MORE LIKELY TO VOTE FOR A CANDIDATE ON NOVEMBER 4TH?

_____ HOWARD BAKER
_____ GEORGE BUSH
_____ BOB DOLE
_____ JESSE HELMS
_____ JACK KEMP
_____ PAUL LAXALT
_____ BOB PACKWOOD
_____ PAT ROBERTSON

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IOWA '86 PROGRAM ID SCRIPT
PAGE TWO

4. WHICH OF THESE LEADER'S ENDORSEMENT WOULD HAVE THE NEXT MOST IMPACT ON YOUR DECISION TO VOTE NOVEMBER 4TH?

_____ HOWARD BAKER
_____ GEORGE BUSH
_____ BOB DOLE
_____ JESSE HELMS
_____ JACK KEMP
_____ PAUL LAXALT
_____ BOB PACKWOOD
_____ PAT ROBERTSON

5. ON AN IMPORTANT MATTER AFFECTING IOWA, DO YOU APPROVE OR DISAPPROVE OF THE JOB THE REAGAN ADMINISTRATION IS DOING ON FARM POLICY?

_____ APPROVE
_____ DISAPPROVE
_____ NO OPINION

IS THAT STRONGLY OR SOMEWHAT (APPROVE)(DISAPPROVE)?

6. FINALLY, I WOULD LIKE TO ASK YOU WHICH OF THESE ACTIVITIES YOU PARTICIPATE IN:

_____ GENERAL ELECTIONS
_____ REPUBLICAN PRIMARIES
_____ PRESIDENTIAL CAUCUSES
_____ YOUR COUNTY'S REPUBLICAN CONVENTION
_____ CONTRIBUTIONS TO REPUBLICAN CANDIDATES
_____ VOLUNTEER FOR CANDIDATES

THANK YOU FOR YOUR TIME.

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Intermarketing

Irwin & Associates Telemarketing, Inc.
2811 Ingersoll Avenue Des Moines Iowa 50312 (515) 244 4700

prop

MARKETING RESEARCH PROJECT

DATE: 10/31/86

CODE	CATEGORY	TOTAL	% OF COMPLETED CONTACTS	% OF COMPLET SURVEYS
100	COMPLETED SURVEYS			
110	R.D. RESPONDERS (Question #3)			
120	R.D. RESPONDERS (Question #4)			
	Total Complete Surveys			
200	NOT INTERESTED			
300	DISC #/ WRONG #			
	Total Completed Contacts			

ACCUMULATED TOTAL AS OF: 10/31/86

CODE	CATEGORY	TOTAL	% OF COMPLETED CONTACTS	% OF COMPLETED SURVEYS
100	COMPLETED SURVEYS	33,914	50.4	64
110	R.D. RESPONDERS (Question #3)	8,509	12.7	16.1
120	R.D. RESPONDERS (Question #4)	10,589 (19,098)	15.7	20
	Total Completed Surveys	53,012	78.8	
200	NOT INTERESTED	10,449	15.5	
300	DISC #/ WRONG #	3,797	5.6	
	Total Completed Contacts	67,258		

Lousiville
'86 primary voters 86.2 %

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IOWA SURVEY TOTALS:

SURVEY CARDS:	29,021	
GOVERNOR:		
REPUBLICAN:	19,537	68.1%
DEMOCRAT:	2,135	7.4%
UNDECIDED:	6,998	24.4%
TOTAL RESPONSES:	28,670	
LEGISLATURE:		
REPUBLICAN:	19,735	84.3%
DEMOCRAT:	1,835	7.8%
UNDECIDED:	1,835	7.8%
TOTAL RESPONSES:	23,405	
PRESIDENT, 1ST:		
BAKER:	1,544	10.6%
BUSH:	6,279	42.9%
DOLE:	5,036	34.4%
HAIG:	168	1.1%
KEMP:	660	4.5%
LAXALT:	100	0.7%
PACKWOOD:	95	0.6%
ROBERTSON:	742	5.1%
TOTAL RESPONSES:	14,624	
PRESIDENT, 2ND:		
BUSH:	5,622	39.8%
DOLE:	5,844	41.4%
KEMP:	1,739	12.3%
ROBERTSON:	905	6.4%
TOTAL RESPONSES:	14,110	
FARM:		
APPROVE:	7,755	28.7%
DISAPPROVE:	8,569	30.9%
UNDECIDED:	11,224	40.5%
TOTAL RESPONSES:	27,750	
POLITICAL:		
PC:	6,149	17.9%
CL:	14,569	42.5%
DC:	6,591	19.5%
UC:	6,861	20.0%
TOTAL RESPONSES:	34,259	

2ND CHOICE			
BUSH	DOLE	KEMP	ROBERTSON
42.3%	44.1%	10.4%	3.2%
1.9%	79.0%	11.2%	7.9%
76.3%	1.0%	17.4%	5.3%
23.9%	33.8%	22.5%	19.7%
40.4%	45.5%	1.3%	12.8%
28.6%	32.1%	35.7%	3.6%
16.5%	57.0%	16.5%	10.1%
44.0%	30.7%	23.5%	1.8%

9304095593

Approved

October 22, 1986

Dear Fellow Republican:

I am writing you today on a matter of urgent importance to Iowa.

Governor Terry Branstad needs your vote on Tuesday, November 4.

It is especially important that you and your family vote this election day. Many choose not to vote in midterm elections. This must not happen this critical year.

This makes your vote--and the vote of every member of your family--very critical.

Let me explain why. Governor Terry Branstad has been a tremendous ally of mine in the battle to make America's farmers competative again. He's providing leadership to solve the problems of rural and small town America.

As the Senator of a midwestern agricultural state, I know firsthand of the struggles family farmers have faced in the last few years. Not all politicians have understood.

But Terry Branstad has. He's led the charge to improve your agricultural situation in Iowa and in the nation as well. As Senate Majority Leader, I have consulted with him on farm matters on more than one occasion.

The Governor is an effective voice for Iowa here in Washington, on agriculture and other issues. And that's important.

But I've also watched his efficient management of your state government--saving you, the taxpayer, millions of dollars. And he's worked to bring more jobs to Iowa.

Under the Governor's leadership, I see a bright future ahead for Iowa. Please make sure we don't lose that opportunity. Be sure to vote.

But don't stop there. Be sure to vote for the GOP ticket: [list statewide candidates]. And don't forget the Republican candidates for the State Senate and House. They'll be a crucial part of the Governor's efforts to get Iowa back on the right track.

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Believe me, as Majority Leader of the United States Senate, I recognize the need for a team. Make sure the Governor can continue his efforts with a strong team backing him up.

Please vote for Terry Branstad on November 4, and for his team. It's so very important for Iowa.

Sincerely,

BOB DOLE

P.S. Your vote can make the difference. Be sure to get out and vote for Governor Branstad and his ticket on election day.

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DOLE FOR PRESIDENT
Review of Campaign America Records -
Telemarketing

Payee	Check #	Check Date	Iowa Allocable Amount	Commission Det'd Iowa Allocable Amount
Lewis & Associates				
Telemarketing Inc.	2945	10/14/86	$ 19,305.00	-0-
	3265	11/03/86	42,120.00	-0-
	3476	12/02/86	9,195.90	-0-
	3310	11/06/86	238.75	-0-
Total			$ 70,859.65	-0-
Ed Nichols Associates	3534	12/09/86	2,635.73	2,635.73
	3533	12/09/86	2,656.14	2,656.14
	3797	01/21/87	2,718.80	2,718.80
	3949	02/13/87	238.75	238.75
	4069	02/26/87	147.00	147.00
	4099	03/02/87	593.85	593.85
Total			$8,990.27	$8,990.27
Follow-Up Letter				
Tom Synhorst (Postage)	3132	10/28/86	5,950.00	-0-
U.S. Postmaster Des Moines	3086	10/23/86	1,300.00	-0-
MacDonald Letter Service	3123	10/27/86	2,683.52	-0-
ABC Mail Service	3122	10/27/86	1,015.00	-0-
ABC Mail Service	4146	03/11/86	143.46	-0-
Follow-Up Letter Total			$11,091.98	-0-
Telemarketing Program Total			$90,941.90	$8,990.27

SENATOR BOB DOLE

ADDRESS TO THE IOWA BANKERS ASSOCIATION

FEBRUARY 7, 1987

I APPRECIATE THE OPPORTUNITY TO ADDRESS THE ANNUAL LUNCHEON OF THE IOWA BANKERS ASSOCIATION. [SIOUX CITY IS ONE OF MY FAVORITE PLACES. IN FACT, LATELY, ANY PLACE IN OR NEAR IOWA IS ONE OF MY FAVORITE PLACES.] (BRACKETS ADDED)

AS MANY OF YOU KNOW, I HAVE SPOKEN TO MANY IOWANS DURING THE PAST FEW MONTHS. IT'S VERY EVIDENT THAT IOWANS HAVE THE SAME INTERESTS AND CONCERNS AS PEOPLE IN MY HOME STATE OF KANSAS -- THEY WANT TO KNOW HOW TO SURVIVE IN SOME TOUGH ECONOMIC TIMES. THEY WANT A PROSPEROUS NATIONAL ECONOMY, BUT THEY'RE ALSO CONCERNED ABOUT THE ECONOMIC WELL-BEING OF RURAL AMERICA.

SO I WILL BEGIN BY CONGRATULATING EACH OF YOU, BECAUSE AS THE COMMERCIAL LENDERS TO THE FARMERS AND SMALL-TOWN BUSINESSMEN AND WOMEN OF IOWA, YOU PLAY A CENTRAL ROLE IN KEEPING THE WHEELS OF IOWA'S ECONOMY TURNING. IT'S NOT AN EASY JOB, BUT IT IS A PARTNERSHIP THAT HAS ENDURED FOR MANY, MANY YEARS THROUGH THE BAD TIMES AS WELL AS THE GOOD.

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A GRASS ROOTS APPROACH

I AM FIRMLY CONVINCED THAT IF WE ARE GOING TO SOLVE THE PROBLEMS FACING RURAL IOWA, RURAL NEBRASKA, RURAL KANSAS OR ANYWHERE ELSE IN RURAL AMERICA, THE ANSWERS ARE GOING TO HAVE TO COME FROM THE GRASS ROOTS AND NOT FROM POLITICIANS IN WASHINGTON D.C.

IN NOVEMBER, GOVERNOR BRANSTAD AND I ORGANIZED THE "REPUBLICAN TASK FORCE ON FARM AND RURAL AMERICA" WITH THE FIRST MEETING IN DES MOINES, IOWA, COMPOSED OF MIDWEST GOVERNORS, SENATORS AND CONGRESSMEN. WITH SEVERAL NEWLY-ELECTED MIDWESTERN GOVERNORS, WE FELT THAT REPUBLICANS HAD AN OPPORTUNITY AND A RESPONSIBILITY TO DEVELOP A CLOSER STATE AND NATIONAL RELATIONSHIP ON FOUR ISSUES IMPORTANT TO RURAL CITIZENS, ESPECIALLY IN THE MIDWEST: FARM POLICY, RURAL DEVELOPMENT, FARM CREDIT AND AGRICULTURAL TRADE AND EXPORTS.

IN ADDITION TO GOVERNOR BRANSTAD, SEVERAL MEMBERS OF THE IOWA DELEGATION WERE PRESENT: REPRESENTATIVES JAMES LEACH, JIM LIGHTFOOT, TOM TAUKE AND FRED GRANDY.

RURAL DEVELOPMENT

AFTER HOLDING MEETINGS IN DES MOINES AND CHICAGO, IT WAS THE TASK FORCE'S CONSENSUS THAT, WHILE THE FARM PROGRAM IS UNDOUBTEDLY A KEY FACTOR IN THE OVERALL RURAL ECONOMY, IT WILL

TAKE MORE THAN CHANGES IN BASIC FARM LEGISLATION TO TURN THINGS AROUND. WE HAVE EXPERIENCED THE EMOTIONAL ROLLER-COASTER OF HOPES AND DISAPPOINTMENTS WHEN WASHINGTON CONSIDERS NEW FARM BILLS. WHILE SOME IMPROVEMENTS ARE MADE, THEY ARE OFTEN TOOBROAD-BASED TO ADDRESS AND RESOLVE LOCAL PROBLEMS. MANY RURAL COMMUNITIES AND BUSINESSES ARE IN CRITICAL DANGER OF COLLAPSE NOW, AND WE NEED TO FOCUS ON WHAT CAN BE DONE THROUGH RURAL DEVELOPMENT PROGRAMS TO SUPPLEMENT WHAT WE DO WITH FARM PROGRAMS.

IN PARTICULAR, WE NEED TO FIND WAYS TO DIVERSIFY THE ECONOMIES OF FARM COMMUNITIES AND PROVIDE EDUCATION AND VOCATIONAL TRAINING OPPORTUNITIES FOR FARMERS AND OTHER RURAL CITIZENS. A NUMBER OF FARM STATES HAVE ALREADY DONE IMPORTANT WORK IN THESE AREAS. WE NEED TO BEGIN TO COORDINATE EFFORTS AT THE FEDERAL LEVEL WITH THE STATES AND PRIVATE ENTERPRISE AND MAKE SURE OUR BASIC COMMODITY PROGRAMS DOVETAIL WITH THESE BROADER INITIATIVES.

WE HAVE ALREADY STARTED IN THE SENATE ON SOME OF THESE ISSUES. DURING CONSIDERATION OF THE FEDERAL HIGHWAY BILL ON FEBRUARY 4, WE ADOPTED AN AMENDMENT BY SENATOR PRESSLER STATING THE FEDERAL GOVERNMENT MUST DO MORE TO ADDRESS THE SERIOUS PROBLEM OF DETERIORATING BUS SERVICE FOR RURAL AMERICA. WE MUST KEEP BASIC SERVICES IN RURAL AMERICA TO ATTRACT NEW BUSINESSES AND PROVIDE NEW JOBS AND GREATER ECONOMIC ACTIVITY.

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RE-TRAINING FOR DISPLACED RURAL AMERICANS

I AM GOING TO MAKE A RECOMMENDATION REGARDING JOB RETRAINING PROVISIONS IN ANY NEW TRADE LEGISLATION CONSIDERED BY THE 100TH CONGRESS. THE ADMINISTRATION'S TRADE BILL CONTAINS NEARLY $1 BILLION IN RE-TRAINING ASSISTANCE FOR WORKERS WHO HAVE LOST THEIR JOBS DUE TO INCREASED IMPORTS. CURRENTLY, 25 PERCENT OF ALL AMERICANS LIVE IN RURAL COMMUNITIES -- COMMUNITIES THAT FACE DIFFICULT ECONOMIC TIMES DUE TO A NUMBER OF FACTORS, INCLUDING A SIGNIFICANT DECLINE IN AGRICULTURAL EXPORTS AND A RISE IN AGRICULTURAL IMPORTS.

I MAY OFFER AN AMENDMENT DURING THIS YEAR'S TRADE DEBATE EARMARKING NOT LESS THAN 25 PERCENT OF ANY JOB RETRAINING FUNDS FOR WORKERS IN RURAL COMMUNITIES -- ALL THE WAY FROM FARMERS TO HARDWARE STORE WORKERS THAT HAVE BEEN AFFECTED BY THE AGRICULTURAL ECONOMY. ITS MY VIEW THAT IF 25 PERCENT OF ALL AMERICANS LIVE IN RURAL AREAS THEY OUGHT TO GET AT LEAST 25 PERCENT OF THE JOB RETRAINING ASSISTANCE.

FARM PROGRAMS

ANOTHER CONCERN OUR REPUBLICAN TASK FORCE ADDRESSED IS FARM CREDIT. PERSONALLY, I THINK MOST BANKERS WOULD SAY THEIR TWO GREATEST FEARS WOULD BE (1) A SHARP REDUCTION IN COMMODITY PROGRAM BENEFITS AND (2) THE COLLAPSE OF THE FARM CREDIT SYSTEM. THESE EVENTS COULD RESULT IN LOWER FARMLAND VALUES AND EXACERBATE THE FARM DEBT PROBLEM.

THE ADMINISTRATION HAS NOTIFIED CONGRESS THAT IT WANTS TO CHANGE THE 1985 FARM BILL. ONE PART OF THEIR LEGISLATIVE PACKAGE WOULD CUT TARGET PRICES BY TEN PERCENT PER YEAR FOR THREE YEARS. THIS WOULD REDUCE SPENDING ON FARM PROGRAMS BY ABOUT $20 BILLION DURING FISCAL YEARS 1988-1992.

MY VIEW IS THAT OUR EFFORTS TO ADDRESS THE FEDERAL BUDGET DEFICITS MAY WELL REQUIRE SOME REDUCTIONS IN SPENDING FOR AGRICULTURAL PROGRAMS. WE ARE ALL FAMILIAR WITH THE FACT THAT FARM PROGRAM COSTS HAVE RISEN FROM AN ANNUAL AVERAGE OF $3-$4 BILLION IN THE LATE 1970'S TO $25.8 BILLION LAST YEAR AND AN ESTIMATED $25.2 BILLION IN FY-1987.

CONGRESS AND THE ADMINISTRATION SHOULD KEEP IN MIND, HOWEVER, THAT, TAKING INFLATION INTO ACCOUNT, THE FARM VALUE OF FOOD ACTUALLY FELL DURING THE PAST DECADE, AND THAT AMERICANS NOW USE ABOUT ONE-THIRD LESS OF THEIR DISPOSABLE INCOME FOR FOOD PURCHASES - SO FARMERS MAY BE RECEIVING MORE OF THEIR INCOME FROM THE GOVERNMENT, BUT THE REAL BENEFICIARIES ARE PEOPLE WHO EAT.

SO, I DON'T BELIEVE CONGRESS WILL APPROVE THE ADMINISTRATION'S TARGET PRICE CUTS -- OR ANY MAJOR FARM PROGRAM CHANGES UNLESS AND UNTIL WE SEE MEANINGFUL AND EQUITABLE ACTION ON BUDGET DEFICITS.

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FARM CREDIT

WE ALSO WANT TO ENSURE THAT AN ADEQUATE SUPPLY OF CREDIT AT REASONABLE RATES IS AVAILABLE TO FARMERS AND RURAL ENTERPRISES. THIS MEANS MAINTAINING THE VIABILITY OF THE COOPERATIVE FARM CREDIT SYSTEM. BUT IT ALSO MEANS THAT OUR EFFORTS TO ASSIST STRUGGLING FARMERS AND THE FARM CREDIT SYSTEM MUST NOT DRIVE COMMERCIAL LENDERS OUT OF THE FARM LOAN BUSINESS.

CHAPTER 12

I HAVE HEARD FROM A NUMBER OF FARM BANKERS IN MY STATE WHO HAVE CONCERNS ABOUT THE NEW CHAPTER 12 LEGISLATION, SPONSORED BY IOWA'S SENIOR SENATOR, CHUCK GRASSLEY. THEY PARTICULARLY QUESTION THE "ADEQUATE PROTECTION" PROVISIONS, WHICH ALLOW A DEBTOR TO STAY IN BUSINESS BY WRITING DOWN FARMLAND DEBT TO ITS CURRENT VALUE.

TO DATE THERE HAS BEEN NO RUSH TO THE BANKRUPTCY COURTS SINCE ENACTMENT OF CHAPTER 12. AS OF JANUARY 22, THERE WERE ONLY 357 FILINGS IN THE 8TH CIRCUIT, WHICH INCLUDES IOWA AND SIX OTHER KEY FARM STATES. THE LIMITED USE OF THE NEW CHAPTER 12 APPEARS TO BE THE NEW TAX REFORM BILL, WHICH ENCOURAGES FARMERS WITH SERIOUS FINANCIAL PROBLEMS TO WRITE DOWN LOSSES INSTEAD OF FILING FOR BANKRUPTCY.

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I SUGGEST WE SHOULD GIVE SENATOR GRASSLEY'S LEGISLATION A FAIR CHANCE TO WORK. CONGRESS WILL BE WATCHING CLOSELY TO SEE WHAT THE REPERCUSSIONS ON FARM LENDING WILL BE. IF SIGNIFICANT PROBLEMS ARISE AND CREDIT THREATENS TO DRY UP, WE ARE PREPARED TO MAKE THE NECESSARY CORRECTIONS.

SECONDARY MARKET

I UNDERSTAND A TASK FORCE HAS BEEN MEETING ON THE SO-CALLED "SECONDARY MARKET" CONCEPT COMPOSED OF THE FARM CREDIT SYSTEM, THE INDEPENDENT BANKERS, THE AMERICAN BANKERS AND INSURANCE COMPANY REPRESENTATIVES. SENATOR GRASSLEY HAS INTRODUCED LEGISLATION TO CREATE A SECONDARY MARKET AS A MEANS OF INCREASING THE AVAILABILITY OF FUNDS FOR FARM LENDING.

THE IDEA OF PACKAGING LONG-TERM FARM LOANS AND MARKETING THEM THROUGH AN ENTITY THAT HAS AGENCY STATUS AND ACCESS TO THE BOND MARKETS -- EITHER THROUGH THE FARM CREDIT SYSTEM OR THROUGH A "FARMER MAC" OR AN "AGGIE MAE" -- IS AN INTRIQUING IDEA THAT DESERVES CLOSE EXAMINATION, ESPECIALLY IF IT COULD BRING MORE CAPITAL TO RURAL COMMUNITIES AND COULD OFFER FARMERS LOWER INTEREST RATES ON REAL ESTATE LOANS.

I THINK THERE SHOULD BE A FULL DISCUSSION OF THIS CONCEPT AND HOW IT MAY BE PART OF OUR OVERALL APPROACH TO THE FARM CREDIT SITUATION THIS YEAR. I ENCOURAGE COMMERCIAL LENDERS TO WORK WITH THE FARM CREDIT SYSTEM AND OTHERS AND CONTINUE TO EXPLORE WHAT MAY PROVE TO BE A VERY USEFUL LENDING TOOL.

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PROPOSED COMMITTEE HEARINGS

RECENTLY THERE HAVE BEEN QUITE A FEW PRESS REPORTS CONCERNING THE FINANCIAL CONDITION OF THE FARM CREDIT SYSTEM. CONGRESS HAS COME TO THE AID OF THE SYSTEM TWICE WITHIN THE LAST 18 MONTHS, PASSING LEGISLATION TO PROVIDE BASIC GUIDELINES FOR REFORMS AND GIVING THE SYSTEM AND ITS BORROWERS MORE FLEXIBILITY IN DEALING WITH THEIR PROBLEMS. THERE ARE MANY WHO SAY THE SYSTEM WILL NEED SOME FEDERAL FINANCIAL ASSISTANCE SOMETIME THIS YEAR UNDER THE 1985 CREDIT ACT. THERE ARE MANY WHO FEEL THE SYSTEM COULD BE MORE CANDID ABOUT THE EXTENT OF ITS DIFFICULTIES AND THE TIMELINESS OF INITIATING A NEW DEBATE ON FURTHER REFORMS AND RESTRUCTURING.

I HAVE WRITTEN SENATOR LEAHY AND SENATOR LUGAR ASKING THE SENATE AGRICULTURE COMMITTEE TO CONDUCT A FULL DAY OF HEARINGS TO INVESTIGATE THE FINANCIAL STATUS OF THE FARM CREDIT SYSTEM AS WELL AS OTHER AGRICULTURAL LENDERS. SUCH A HEARING WOULD PROVIDE AN OPPORTUNITY TO RECEIVE RECOMMENDATIONS FROM THE FARM CREDIT ADMINISTRATION, THE FARM CREDIT SYSTEM AND FROM COMMERCIAL AGRICULTURAL LENDERS REGARDING MEASURES THAT MAY BE NECESSARY TO ENSURE OUR FARMERS HAVE ACCESS TO AN ADEQUATE SUPPLY OF CREDIT AT REASONABLE RATES.

I DON'T WANT TO BE CAUGHT WITH EVERYONE COMING TO CONGRESS AND SAYING THAT THE SYSTEM NEEDS ASSISTANCE WITHIN A WEEK. THIS IS AN ISSUE THAT DOES NOT NEED TO SURPRISE ANY OF US, SO WHY NOT START NOW TO THINK ABOUT THE VIRTUES AND DRAWBACKS OF ANY ALTERNATIVES TO HELP THE SYSTEM THROUGH TOUGH TIMES. CONGRESS IS

GETTING TIRED OF PASSING LEGISLATION THAT EVERYONE SAYS WILL "SAVE THE FARM CREDIT SYSTEM" -- ONLY TO FIND OUT THREE MONTHS LATER THAT THE PROBLEM STILL EXISTS.

CONCLUSION

NOT LONG AGO, I SPOKE TO YOUR STATE SHERIFFS' ASSOCIATION ABOUT SOME OF THE ISSUES IMPORTANT TO THEIR MEMBERS AND TO IOWA. AGRICULTURE WAS AT THE TOP OF THE LIST.

THERE PROBABLY WASN'T A SHERIFF IN THE ROOM WHO HAD NOT FELT THE EFFECTS OF THE DEPRESSED FARM ECONOMY. AND THE EFFECTS ARE VERY REAL, FOR IT IS THE SHERIFF OR A DEPUTY SHERIFF WHO TAKES THAT LONG DRIVE UP A FARMER'S LANE TO DELIVER A FORECLOSURE OR EVICTION NOTICE.

LIKE THOSE SHERIFFS, YOU ALSO KNOW THE PROBLEMS OUR RURAL ECONOMY FACES. AND I DOUBT THERE IS A PERSON IN THIS ROOM WHO HASN'T FELT THE PAIN OF TURNING DOWN A FARMER - PERHAPS A NEIGHBOR OR A FRIEND YOU'VE KNOWN FOR YEARS - WHO WAS LOOKING FOR A LITTLE BREATHING ROOM, A SECOND CHANCE, A NEW HOPE FOR THE FUTURE.

9304095560S

BUT WHEN FARMERS ARE IN TROUBLE, YOUR BUSINESS - THE BUSINESS OF BANKING - IS ALSO IN TROUBLE. 1986 SAW RECORD LOSSES FOR IOWA BANKS, ATTRIBUTABLE IN LARGE PART TO THE STATE'S DEPENDENCY ON AN AGRICULTURE-BASED ECONOMY. BUT THERE MAY BE SOME GOOD NEWS AROUND THE CORNER.

I KNOW THAT YOUR STATE BANKING COMMISSIONER IS PREDICTING FEWER BANK CLOSURES IN IOWA THIS YEAR. AND IN WASHINGTON, WE'RE LOOKING FOR BETTER WAYS TO HELP BOTH THE FARMER AND THE BANKER.

NOW SOME WOULD SAY THAT WE IN WASHINGTON MUST PROVIDE ALL THE SOLUTIONS. AND WE OFTEN TRY. BUT, AS I'VE SAID MANY TIMES BEFORE, WE IN CONGRESS CANNOT GUARANTEE THAT EVERYONE IN OUR SOCIETY SUCCEEDS. ALL WE CAN DO IS STRIVE TO PROVIDE THE RIGHT KIND OF ENVIRONMENT WHERE PEOPLE HAVE THE OPPORTUNITY TO SUCCEED - BUT WE CANNOT GUARANTEE SUCCESS.

BUT IF WE WORK TOGETHER, PERHAPS WE CAN MAKE 1987 A BEGINNING FOR MORE SUCCESSFUL TIMES IN AGRICULTURE. I LOOK FORWARD TO WORKING WITH YOU.

9304095506

BEVERLY HUBBLE TAUKE

400 "O" Street S.W. #203
Washington D.C. 20024
(202) 484-7134

TO: SENATOR DOLE

FEBRUARY 18, 1987

FROM: BHT

RE: IOWA TALKING POINTS

QUAD CITIES ISSUES

* **CATERPILLAR PLANT CLOSING:** As confirmed in February 17 announcement, wipes out 1,300 jobs despite plant's track record as most productive CAT plant in USA; its demise due to LOSS OF FOREIGN MARKETS. Plant will phase out during late 1987, 1988.

(TIE TO DOLE TRADE AGENDA TO PROTECT IOWA AND U.S. JOBS... As proven by Dole battles against unfair Canadian pork imports and unfair ethanol imports <mostly Brazil>, Bob Dole is committed to enforce U.S. trade laws, and demand free but FAIR TRADE.

ALSO USEFUL HERE: Other Dole initiatives re: strong dollar, aggressive pursuit of international markets, erosion of federal red tape/barriers to strong trade.)

* **MISSISSIPPI RIVER PROJECT:** Officials in area are pushing number of proposed projects (but not in total agreement) including:

* Possible use of old Case building outside Davenport as a museum or tourist center, enhancing river area appeal to tourists.

* Bi-State commission urging construction of new bridge--old one viewed as severely inadequate link between Iowa-Illinois.

* Riverboat gambling to attract more business.

* New levies - could include federal funds if cities match funding.

* River seen as centerpiece of long-range (20-year) development plan promoted by local media to unite Quad Cities more as single community; would include removal of commercial properties along river.

* These proposals have not really moved past promotion stage.

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IOWA TALKING POINTS

SUPPORT FOR IOWA FARMERS

* **UNFAIR CANADIAN PORK IMPORTS:** Dole/Grassley initiative led to PUNITIVE DUTIES for Canadians dumping pork unfairly on U.S., with enormous stakes for Iowa.

* **UNFAIR ETHANOL IMPORTS:** Dole battles vs. unfair ethanol imports, severely jeopardizing corngrowers & corn-based ethanol industry, at great risk to Iowa. Such battles have stymied ethanol imports, saving U.S. ag economy about $900 million in late '85 - early '86 alone, according to ethanol industry.

* **BILL TO ADVANCE SPRING PAYMENTS**, Dole-backed, would mean 725m - 750 million early dollars to Iowa farmers.

* **SOIL TILTH CENTER, IOWA STATE UNIVERSITY** - Dole, supporting C.Grassley, engineered restoration of **$11.1 MILLION** to ISU for research crucial in battle for U.S. agriculture to compete effectively in global markets. Study of new growth options, new uses of U.S. food and fiber....to sustain the 7 out of 10 Iowa jobs now dependent on agriculture.

* **1985 FARM BILL:** Suggest keeping this tight with few key points:

(1) No bill would please all farmers.

(2) Under REPUBLICAN-SHAPED programs of past FIVE YEARS (1982-1986), MORE WAS SPENT ON AGRICULTURE ($104 BILLION estimate as of last Spring) than was spent on agriculture during prior 18 YEARS! If commitment to American farmers is measured by dollars, the fact is that the REPUBLICAN SENATE delivered far greater support to agriculture than previously offered under Democratic control.

(3) Suggest emphasis on achievements of farm program, light acknowledgment of inevitable inadequacies, but no need to use extensive remarks to defend Farm Bill. Sounds too defensive.

TAX REFORM

* **WINNING OVERWHELMING BIPARTISAN SUPPORT FROM 97 SENATORS**, Republican-controlled Senate last year led way to most sweeping tax reform in 40 years.

* "I'm sorry our party didn't put it in our 1984 platform," groused Democratic presidential hopeful Gary Hart, "but it got away from us and it's theirs now." (**Washington Post**).

* No wonder Democrats cringed at Republican-led reforms. Through that historic overhaul, Republicans:

  - Assured **LOWER RATES** for about 80% of all U.S. taxpayers.

  - Eliminated about 6 **MILLION POOR** from the tax rolls.

o Reduced the top rate of 27% lower than at any time since 1931.

* **INCOME TAX INDEXING**, engineered by Republicans, assured PRIMARY RELIEF TO **WOMEN AND MINORITIES.** (Concentrated relief for low-income taxpayers who move up narrow tax brackets faster.)

TAX REFORM, Cont'd

* **DEMOCRATS MAY WIN THE RHETORIC BATTLE** - but it's REPUBLICANS WHO HAVE DELIVERED TAX RELIEF to the very "workers, women, minorities and poor" for whom Democrats too often claim exclusive concern.

* **NEW CHALLENGE:** TO BEAT BACK INEVITABLE DEMOCRATIC ATTEMPTS TO STRIP AWAY THOSE HARD-WON TAX BREAKS! Democrat-controlled House has already rejected efforts to protect tax relief from early erosion. **DOLE RESOLUTION** seeks to put Senators on record **AGAINST ANY INCOME TAX INCREASE THIS YEAR.** American workers won substantial tax relief under the DOLE WATCH, and I'm now making TAX RELIEF PRESERVATION a top priority on the Republican agenda.

BALANCED BUDGET

* **IN MY (DOLE) CRUSADE FOR BALANCED BUDGET AMENDMENT**, I've traveled to Michigan & elsewhere to lobby legislators.... 32 states have adopted resolutions urging constitutional amendment limiting taxes and requiring a balanced federal budget. **I'M COMMITTED TO A BALANCED BUDGET AMENDMENT.**

* **SENATE BUDGET VOTE IN 1985 TO ELIMINATE 13 FEDERAL PROGRAMS**, & restrict spending in hundreds of other programs was a major victory towards budget restraint....FOILED ONLY WHEN THE HOUSE BALKED!

* **GRAMM-RUDMAN** has been useful in moving U.S. towards budget control But a statute can be modified, postponed, or amended by a simple majority...which is why we need the Constitutional amendment to force Congress to fiscal responsibility.

WOMEN'S ISSUES

* **PENSION REFORM:** Dole-backed legislation gave YOUNG WOMEN the right to qualify earlier for pension programs, and guaranteed OLDER WOMEN a share of their spouse's retirement income. (Because highest percentage of women work during early twenties, exclusion of those workers from pension accrual proved a greater liability to female than male workers).

* **CHILD SUPPORT ENFORCEMENT:** Dole-backed legislation now allows state and federal governments to WITHHOLD TAX REFUNDS from parents (most often fathers) delinquent on child support payments. Such child-support enforcement crucial to relieve enormous economic pressure often confronting women who head households.

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* **DISCRIMINATORY LAWS:** A Dole proposal would not allow federal funds for enforcement of laws with gender-based distinctions.

MINORITY RIGHTS

* **VOTING RIGHTS ACT:** (Briefly explain stakes for black voters in some U.S. communities)... Dole led Republican support WITHOUT WHICH minority voters in some U.S. communities would have LOST legal protection essential to guarantee their basic Constitutional rights.

MINORITY RIGHTS, Cont'd

* **MARTIN LUTHER KING HOLIDAY:** Floor leader to navigate legislation through Senate. Message to black Americans: The Party of Abraham Lincoln REMAINS home of MANY OF US deeply committed to full freedom, rights, of all Americans. (Note: Despite Iowa's minuscule minority population, Iowans of all stripes are generally supportive or at least not antagonistic to this type social issue.)

NOTE: GENERAL OBJECTIVES OF IOWA TALKING POINTS

* **ADDRESS VALUES IMPORTANT TO IOWANS:** Initiatives on agricultural generally, pork/corn specifically, tie RJD to Iowa's best interests far more tightly than possible with any other Republican hopeful, possibly than any Democrat.

* **OFFER IOWANS A FRIEND IN THE WHITE HOUSE:** If candidates are confronted with question: How should your PAST commitments assure Iowans that if you are elected Iowa will have a friend in the White House.... It's likely NO ONE could answer that challenge as effectively as RFD. So we should make sure the question is asked...and asked...and asked. (Using past as barometer of future) <Useful in other farm states as well, for that matter....> (BRACKETS ADDED)

* **DEFINE BOB DOLE WITH ECONOMICALLY CONSERVATIVE AND COMPASSIONATE SUBSTANCE:** A too-rare combination, but VERY APPEALING to Iowans. Stress the balanced-budget, tax control substance without wearing out the "conservative" term; But also stress important Dole battles for women, poor, minorities, handicapped for the conservative-with-a-heart [illegible] reflecting Iowa values.

* **WOMEN/MINORITY RIGHTS** included here primarily because those issues were raised in prior Iowa town meetings. Some settings may not warrant such emphases, but the solid DOLE RECORD should be cited when issues raised:

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DOLE FOR PRESIDENT
REVIEW OF CAMPAIGN AMERICA PAC RECORDS
SCHEDULE OF EVENTS AND MEETINGS HELD IN IOWA BETWEEN 1/31/86-2/23/87

(SEE EXPLANATION OF COLUMN HEADINGS ON PAGE 10 of 10)

EVENTS:

DESCRIPTION OF EVENT/ DATE OF EVENT/ PAYEE	CHECK # & CHECK DATE	IOWA ALLOCABLE AMT	IOWA TRVL-NON ALLOCABLE	OTHER EXPENSES	MEMO ENTRY EXPS	ATTENDEES @ EVENT
3/31/86-4/01/86 MEETING HELD AT HOTEL DSM						ATTENDEES: SENATOR DOLE TOM SYNHORST M GLASSNER D DEVINS F BROWN T SOUCY-ROCK ISLAND, NEAR DAVENPORT
HOTEL FORT DSM	1898/4-24	140.19				
EXECUTIVE AIR TRAVEL	1892/4-24	1,294.58	5,959.15			
FLOYD BROWN	1805/4-07				254.48	
INTERNATIONAL TOURS ALEXANDRIA FLOYD BROWN	1775/4-01 ,,				290.00	
ROBERT WALLACE	1929/3-31	36.00				
ROBERT WALLACE	1951/3-31	6.00				
TOM SOUCY	1811/4-08	345.64				
SUBTOTALS:		1,822.41	5,959.15		544.48	
4/04/86-4/05/86 EVENTS & MEETINGS THROUGHOUT IOWA						ATTENDEES: SENATOR DOLE FLOYD BROWN JOE BARRETT DONALD DEVINE
EXECUTIVE JET AVIATION	1892/4-24	513.72	4726.23			
INTERNATIONAL TOURS ALEXANDRIA FLOYD BROWN	1884/4-21 ,,				285.00	
JOE BARRETT	1814/4-8	193.38		226.68	168.57	
JOE BARRETT	1703					
INTERNATIONAL TOURS ALEXANDRIA DONALD DEVINE	1775/4-01 ,,		224.00			
SUBTOTALS:		707.10	4,950.23	226.68	453.57	
4/18/86 AN EVENT AT WAPALLO IOWA & A REPUBLICAN DINNER @ DSM 4-24-86						ATTENDEES: F BROWN J REHMAN
IOWA DINING	1856/4-18	1,396.82				
VFW POST 5166	1857/4-18	275.00				
PAT PARSONS	1858/4-18	206.81				
C HICKLIN	1859/4-18	18.59				
R GERST	1860/4-18	284.00				
FLOYD BROWN	1905/4-29				989.37	
JOHN REHMAN	2152/6-16				334.22	
SUBTOTALS:		2,181.22			1,323.59	

DESCRIPTION OF EVENT/ DATE OF EVENT/ PAYEE	CHECK # & CHECK DATE	IOWA ALLOCABLE AMT	IOWA TRVL-NON ALLOCABLE	OTHER EXPENSES	MEMO ENTRY EXPS	ATTENDEES # EVENT
4-30-86/5-03-86						ATTENDEES:
IOWA CONGRESSIONAL DISTRICT CONVENTIONS						SENATOR DOLE
						PAUL RUSSO
ROBERT VANESSE	1962/5-06	329.78				M GLASSNER
ROBERT VANESSE	1972/5-09	274.04	200.93			W SWEENEY
WARREN SWEENEY	2373/7-25	254.47	4.00	50.67		R VANASSE
HOTEL FORT DSM FOR:	2042/5-27					S SEGO
ROBERT VANESSE	''	726.03				F BROWN
SENATOR DOLE	''	141.65				J BARRETT
PAUL RUSSO	''	116.95				B BERRY
MIKE GLASSNER	''	49.53				
WARREN SWEEENEY	''	38.85				
JOE BARRETT	''	78.20				
STEVE SEGO	''	285.49				
FLOYD BROWN	''				445.90	
JOE BARRETT	1889/4-22	197.36		206.29		
JOE BARRETT	1976/5-09					
BRIAN BERRY	1945/5-05	332.88				
FLOYD BROWN	1984/5-14				675.90	
STEVE SEGO	1938/5-05	61.79				
FLOYD BROWN	2425/8-05				258.94	
TIBBEN FLIGHTS	1978/5-14	1,451.52				
SUBTOTALS:		4,338.54	204.93	256.96	1,380.74	
6/20/86-6/21/86						ATTENDEES:
IOWA GOP CONVENTION						SENATOR DOLE
FLOYD BROWN	2203/6-25				339.14	J VOIGHTS
BRENT BAHLER	2221/6-27	3.20	297.50			F BROWN
HOTEL FORT DSM FOR:	2277/7-03					D DEVINE
JANE VOIGHTS	''				176.06	
MARRIOT HOTEL	2276/7-03	156.00				
FRED DOWIE	2275/7-03	63.34				
CITY OF DES MOINES	2278/7-03	50.00				
ALEXANDERS PHOTO SERVICE	2291/7-07	340.74				
'' ''	2323/7-17	34.32				
CONAGRE, INC	2733/9-18		933.00			
ALEXANDRIA TRAVEL SERVICE FOR:	2191/6-23					
DONALD DEVINE	''		232.00			
INTERNATIONAL TOURS ALEXANDRIA	2261/7-02					
FLOYD BROWN	''				464.00	
SUBTOTALS:		647.60	1,462.50		979.20	

DESCRIPTION OF EVENT/ DATE OF EVENT/ PAYEE	CHECK # & CHECK DATE	IOWA ALLOCABLE AMT	IOWA TRVL-NON ALLOCABLE	OTHER EXPENSES	MEMO ENTRY EXPS	ATTENDEES @ EVENT
7/25/86-7/26/86						ATTENDEES:
5TH DISTRICT REPUBLICAN EVENT -- ATLANTIC IOWA						JOHN REHMAN
						SENATOR DOLE
J REHMAN	3335/11-11				475.18	
SUBTOTALS:			0	0	475.18	
8/03/86-8/04/86						
MEETING @ HOTEL DSM						ATTENDEES:
FLOYD BROWN	2506/8-19					SEN DOLE
HOTEL FORT DSM	2687/8-14				65.56	F BROWN
HOTEL FORT DSM	2487/8-14				105.14	B LACY
HOTEL FORT DSM FOR:	2485/8-14					D DEVINE
JANE VOIGHTS	,,					M GLASSNER
PRATT AUDIO VISUAL	2484/8-14	29.83			93.06	JANE VOIGHTS
BURLINGTON INDUSTRIES FOR:	2426/8-05		2,315.00			
,, ,,	2377/7-25		453.00			
FLOYD BROWN	2377/7-25					
SENATOR DOLE	,,				903.00	
MIKE GLASSNER	,,					
ABNOR	,,					
PLESSEN	,,					
MICKELS	,,					
MELISIS	,,					
INTERNATIONAL TOURS ALEXANDRIA	2468/8-12					
DONALD DEVINE	,,		480.00			
FLOYD BROWN	,,					
BILL LACY	,,				480.00	
			480.00			
SUBTOTALS:		29.83	3,728.00		1,646.76	

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DESCRIPTION OF EVENT/ DATE OF EVENT/ PAYEE	CHECK # & CHECK DATE	IOWA ALLOCABLE AMT	IOWA TRVL-NON ALLOCABLE	OTHER EXPENSES	MEMO ENTRY EXPS	ATTENDEES @ EVENT
8/22/86-8/23/86 IOWA STATE FAIR						ATTENDEES: SENATOR DOLE F BROWN JOE KELLEY TOM SOUCY M GLASSNER BILLL LACY BEN SCHWARM
FLOYD BROWN	2584/9-02				354.85	
JOE KELLY	2908/10-10	12.28				
JOE KELLY	2603/9-03	91.92	461.00			
JOE KELLY	2634/9-05	137.48				
TOM SOUCY	2776/9-23	94.77	250.00			
TOM SOUCY	2871/10-06	119.53	275.00			
RUAN INC	2732/9-18		2,177.00			
DSM FLYING SERVICE	2541/8-22	791.00				
TIBBEN FLIGHTS	3299/11-05	198.72				
HOTEL DSM FOR:	2814/9-30					
FLOYD BROWN	,,				284.99	
JANE VOIGHTS	,,				72.29	
TOM SAUCY	,,	239.59				
SENATOR DOLE	,,	138.75				
BILL LACY	,,	58.29				
MIKE GLASSNER	,,	50.71				
BILL LACY	2576/8-28		15.00	418.78		
BEN SCHWARM	2635/9-05	236.99	350.00	288.00		
FREEMAN COMPANY	2661/9-10	68.12				
SUBTOTALS:		2,238.15	3,528.00	706.78	712.13	
9/19/86-9/21/86 SENATOR GRASSLEY BIRTHDAY EVENTS						ATTENDESS: SENATOR DOLE J DAVIS J. RAUBER F BROWN
JEFF DAVIS	2842/10-01	291.57	373.00			
J RAUBER, JR	2839/10-01	85.49	489.00			
FLOYD BROWN	2769/9-23				266.94	
MISSISSIPPI CHEMICAL COMPANY	2738/9-18		2,602.84	5,205.66		
INTERNATIONAL TOURS ALEXANDRIA	2833/10-01					
FLOYD BROWN	,,				440.00	
SUBTOTALS:		377.06	3,464.84	5,205.66	706.94	

DESCRIPTION OF EVENT/ DATE OF EVENT/ PAYEE	CHECK # & CHECK DATE	IOWA ALLOCABLE AMT	IOWA TRVL-NON ALLOCABLE	OTHER EXPENSES	MEMO ENTRY EXPS	ATTENDEES @ EVENT
10/21/86-10/22/86 STEERING COMMITTEE MEETING						
HOTEL FORT DSM FOR:	3370/11-18					ATTTENDEES:
FLOYD BROWN	"					FLOYD BROWN
BILL LACY	"					BILL LACY
DONALD DEVINE	"	38.85			136.84	DON DEVINE
INTERNATIONAL TOURS ALEXANDRIA	3212/10-29	69.74				CAL HULTMAN
BILL LACY	"					JOHN REHMAN
CAL HULTMAN	3138/10-28		530.00			
JOHN REHMAN	3440/10-28				88.99	
SUBTOTALS:					456.25	
		108.59	530.00		682.08	
10/27/86-10/28/86 DAVENPORT,COUNCIL BLUFF,CEDAR RAPIDS						
BLACKHAWK HOTEL FOR:	3272/11-04					ATTENDEES:
SENATOR DOLE	"					SENATOR DOLE
MIKE GLASSNER	"	33.00				M GLASSNER
FLOYD BROWN	"	36.90				F BROWN
DONALD DEVINE	"					D DEVINE
SARA CEDARHOLM	3352/11-13	59.91			47.64	S CEDARHOLM
INTERNATIONAL TOURS ALEXANDRIA	3372/11-18	173.98				C HULTMAN
SARA CEDARHOLM	"					J VOIGHTS
AMERICAN FINANCIAL GROUP	3330/11-11		145.00			
INTERNATIONAL TOURS ALEXANDRIA	3312/10-29		3,784.67	7,569.33		
JANE VOIGHTS	"					
SUBTOTALS:					525.00	
		303.79	3,929.67	7,569.33	572.64	

DESCRIPTION OF EVENT/ DATE OF EVENT/ PAYEE	CHECK # & CHECK DATE	IOWA ALLOCABLE AMT	IOWA TRVL-NON ALLOCABLE	OTHER EXPENSES	MEMO ENTRY EXPS	ATTENDEES @ EVENT
11/24/86-11/26/86						ATTENDEES:
MEETING @ DSM/AGRICULTURE SUMMIT CONFERENCE						SENATOR DOLE
						FLOYD BROWN
FLOYD BROWN	3487/12-05					SANDRA CHURCH
SARA CEDARHOLM	3620/12-24	236.50			188.67	SARA CEDARHOLM
LESHER & ASSOCIATES	3479/12-02	52.50	222.50			GOVERNOR BRANSTAD
AIRPORT HILTON	3395/11-20	208.00				CONGRESSMAN LEACH
AIRPORT HILTON	3791/1-21	379.28				CONGRESSMEN TAUKE
INTERNATIONAL TOURS ALEXANDRIA	3505/12-05					T GRANDY
FLOYD BROWN	,,					M SCANLON
SARA CEDARHOLM	,,				480.00	
AMERICAN FINANCIAL CORPORATION	3607/12-23		234.00			
BETTY'S WORLD OF TRAVEL	3793/1-21		4,785.00			
			264.00			
SUBTOTALS:		876.28	5,505.50		668.67	
12/02/86-12/07/86						ATTENDEES:
DOLE'S ADDRESS TO IOWA SHERIFFS & DEPUTIES ASSOCIATION						SENATOR DOLE
						FLOYD BROWN
FLOYD BROWN	3867/2-02					PENNY BROWN
PENNY BROWN	3645/1-07				61.09	SARA CEDARHOLM
RUAN INCORPORATED	3520/12-09				92.42	
INTERNATIONAL TOURS ALEXANDRIA	3595/12-23		2,175.00			
SARA CEDARHOLM	,,					
FLOYD BROWN	,,		228.00			
SARA CEDARHOLM					250.00	
		269.04	10.00		5.00	
SUBTOTALS:		269.04	2,413.00	0	408.51	

1987

DESCRIPTION OF EVENT/ DATE OF EVENT/ PAYEE	CHECK # & CHECK DATE	IOWA ALLOCABLE AMT	IOWA TRVL-NON ALLOCABLE	OTHER EXPENSES	MEMO ENTRY EXPS	ATTENDEES @ EVENT
1/12/87						
DOLE'S ADDRESS TO LUMBERMAN'S ASSOCIATION						
						ATTENDEES:
FLOYD BROWN	3867/2-02					SEN DOLE
HOTEL FORT DSM	4235/3-23	640.47			57.98	T SYNHORST
AVIS RENT-A-CAR FOR:	3924/2-10					F BROWN
TOM SYNHORST	"				87.97	
TOM SYNHORST	3792/1-21				156.11	
CONAGRE.INC	3699/1-09		845.00	1,690.00		
BUSINESSMAN'S ASSURANCE CO	3766/1-16		481.67	2,408.33		
INTERNATIONAL TOURS ALEXANDRIA	3803/1-22					
TOM SYNHORST	"				278.00	
SUBTOTALS:		640.47	1,326.67	4,098.33	580.06	
1/21/87-1/23/87						
DOLE'S ADDRESS TO AGC						ATTENDEES:
						SEN DOLE
HOTEL FORT DSM	4235/3-23	871.94				T SYNHORST
INTERNATIONAL TOURS ALEXANDRIA	3803/1-22					F BROWN
TOM SYNHORST	"					
FLOYD BROWN	3871/1-22				390.00	
KVI AVIATION	3773/1-20		2,610.00		328.00	
SUBTOTALS:		871.94	2,610.00		718.00	

DESCRIPTION OF EVENT/ DATE OF EVENT/ PAYEE	CHECK # & CHECK DATE	IOWA ALLOCABLE AMT	IOWA INVL-NON ALLOCABLE	OTHER EXPENSES	MEMO ENTRY EXPS	ATTENDEES @ EVENT	Commission Determined IA Allocable
1987							
TOWN MEETINGS:							
2/07/1987						ATTENDEES:	
TOWN MEETING @ ORANGE CITY & IOWA BANKERS ASSOCIATION ADDRESS						SEN DOLE T SYNHORST	
LONG LINE COMMUNICATIONS	3899/2-06		1,938.00				
THE COMPANIES OF CLARK	4345/4-09	344.80					172.44
US POSTMASTER	3823/1-27	2,349.48					2,349.48
MACDONALD LETTER SERVICE	4350/4-10	470.65					470.65
TOM SYNHORST	4073/2-26				341.69		
SUBTOTALS:		3,165.01	1,938.00		341.69		2,992.57
2/12/1987							
TOWN MEETING						ATTENDEES:	
						SEN DOLE	
MACDONALD LETTER SERVICE	4350/4-10	199.00				T SYNHORST	199.00
US POSTMASTER	3850/1-?	1,785.14				BEV TAUKE	1,785.14
GROWTH INDUSTRIES	3902/2-06		983.50	2,950.50		C LEHMKUHL	
INTERNATIONAL TOURS ALEXANDRIA	4018/2-20						
BEVERLY TAUKE	"		598.00				
TOM SYNHORST	"						
TOM SYNHORST	4044/2-25				696.00		
					372.37		
SUBTOTALS:		1,984.14	1,581.50	2,950.50	1,068.37		1,984.14
2/22/87							
TOWN MEETING, DSM						ATTENDEES:	
						SENATOR DOLE	
MACDONALD LETTER SERVICE	4262/3-31	1,762.00				T SYNHORST	1,762.00
US POSTMASTER	3952/2-16	7,215.60				M GLASSNER	7,215.60
DES MOINES AIRPORT HILTON	4246/3-24	36.10					36.10
DES MOINES AIRPORT HILTON	4024/2-23	338.00					338.00
REFCO INCORPORATED	3989/2-19		1,383.00	1,383.00			
INTERNATIONAL TOURS ALEXANDRIA	4109/3-04						
TOM SYNHORST	"				390.00		
TOM SYNHORST					167.08		
SUBTOTALS:		9,351.70	1,383.00	1,383.00	557.08		9,351.70

DESCRIPTION OF EVENT/ DATE OF EVENT/ PAYEE	CHECK # & CHECK DATE	IOWA ALLOCABLE AMT	IOWA TRVL-NON ALLOCABLE	OTHER EXPENSES	MEMO ENTRY EXPS	ATTENDEES @ EVENT	Commission Determined IA Allocable
2/23/87 BREAKFAST MEETING, DAVENPORT						ATTENDEES: SENATOR DOLE M GLASSNER S MATTER T SYNHORST F BROWN	
KVI AVIATION	3990/2-19		1,620.00				
BLACKHAWK HOTEL FOR:	4236/3-23						
FLOYD BROWN	"				41.42		
TOM SYNHORST	"				41.42		
S MATTER	"	41.42					41.42
M GLASSNER	"	60.35					60.35
SENATOR DOLE	"	254.17					254.17
TOM SYNHORST					97.02		
SUBTOTALS:		355.94	1,620.00	0	179.86		355.94
SUBTOTALS:							
	3/31/86	1,822.41	6,183.15	0	544.48		
	4/04/86	707.10	4,726.23	226.68	453.57		
	4/18/86	2,181.22	0	0	1,333.59		
	4/30/86	4,338.54	204.93	256.96	1,380.74		
	6/20/86	647.60	1,462.50	0	979.20		
	7/25/86	0	0	0	475.18		
	8/03/86	29.83	3,728.00	0	1,646.76		
	8/22/86	2,238.15	3,528.00	706.78	1,173.13		
	9/19/86	377.06	3,464.84	5,205.66	706.94		
	10/21/86	108.59	530.00	0	225.83		
	10/27/86	303.79	3,929.67	7,569.33	572.64		
	11/24/86	876.28	5,505.50	0	688.67		
	12/02/86	269.04	2,413.00	0	408.51		
	1/12/87	640.47	1,326.67	4,098.33	580.06		
	1/21/86	871.94	2,610.00	0	718.00		
	2/07/87	3,165.01	1,938.00	0	341.69		2,992.57
	2/12/87	1,984.14	1,581.50	2,950.50	1,068.37		1,984.14
	2/22/87	9,351.70	1,383.00	1,383.00	557.08		9,351.70
	2/23/87	355.94	1,620.00	0	179.86		355.94
GRAND TOTALS:		30,268.81	46,134.99	22,397.24	14,024.30	$112,825.34	14,684.35

MJ001122

DOLE FOR PRESIDENT

Definition of Columns:

- Iowa Allocable Amount - These CA expenses are allocable to the Iowa spending limitation. Since CA personnel are not Committee employees, the "5 day rule" is not applied.

- Iowa Travel Non-Allocable - These expenses relate to CA Iowa activity but are for interstate travel, interstate telephone expenses, etc., and as such are not allocable to the Iowa spending limitation.

- Other Expenses - These expenses do not relate to Iowa but were paid with a CA check which also paid expenses related to Iowa.

- Memo Entry Expenses - These expenses are included in amounts discussed with respect to the payee. They are shown here only to provide a more complete picture of the event and attendees.

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DOLE FOR PRESIDENT
Campaign America Expenses -
Floyd Brown

Payee	Dates	Check #	Check Date	Iowa Allocable Amount	Non-Allocable Iowa Amount	Other Amount	Salary
Floyd Brown	03/18/86-03/22/86	1804	04/07/86	$ 545.26	$ -0-	$ -0-	
Inter. Nat. Tours	03/18/86	1775	04/01/86	-0-	434.00	-0-	
Floyd Brown	03/23/86-3/26/86	1803	04/07/86	680.11	469.00	-0-	
Federal Express	03/25/86	2091	06/04/86	23.00	-0-	-0-	
Floyd Brown	03/16/86-3/31/86	Report	04/01/86				$1,185.92
Floyd Brown	03/30/86-04/01/86	1805	04/07/86	254.58	-0-	-0-	
Inter. Nat. Tours	03/30/86	1775	04/01/86	-0-	290.00	-0-	
Floyd Brown	04/02/86-04/05/86	1805	04/07/86	370.56	468.00	33.02	
Inter. Nat. Tours	04/02/86	1884	04/21/86	-0-	285.00	-0-	
Floyd Brown	04/01/86-04/15/86	Report	04/15/86				1,185.92
Inter. Nat. Tours	04/16/86	1884	04/21/86	-0-	730.00	-0-	
Floyd Brown	04/16/86-04/18/86	1905	04/29/86	216.98	-0-	299.02	
Floyd Brown	04/19/86-04/25/86	1905	04/29/86	425.82	-0-	47.50	
	04/22/86-04/25/86	2425	08/05/86	129.30	-0-	-0-	
Floyd Brown	04/15/86-04/30/86	Report	04/29/86				1,185.92
Floyd Brown	04/29/86-05/04/86	1984	05/14/86	675.90	-0-	510.39	
HT. FT. DSM	04/29/86-05/04/86	2042	05/27/86	445.90	-0-	-0-	
Floyd Brown	05/01/86-05/04/86	2425	08/05/86	258.94	-0-	-0-	
Floyd Brown	05/01/86-05/15/86	Report	05/14/86				1,185.92
HT. FT. DSM	05/15/86-05/17/86	2078	06/02/86	153.52	-0-	-0-	
Floyd Brown	05/15/86-05/17/86	2149	06/16/86	244.37	-0-	646.15	
Floyd Brown	05/16/86-05/31/86	Report	06/01/86				1,185.92

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Payee	Dates	Check #	Check Date	Iowa Allocable Amount	Non-Allocable Iowa Amount	Other Amount	Salary
Floyd Brown	06/09/86-06/11/86	2149	06/16/86	171.90	-0-	-0-	
	06/09/86-06/11/86	2425	08/05/86	142.40	-0-	-0-	
Inter. Nat. Tours	06/09/86	2144	06/16/86	-0-	444.00	-0-	
HT. FT. DSM	06/09/86-06/11/86	2151	06/16/86	129.94	-0-	-0-	
Floyd Brown	06/01/86-06/15/86	Report	06/15/86				1,185.92
Floyd Brown	06/18/86-06/20/86	2203	06/25/86	339.14	-0-	79.30	
Inter. Nat. Tours	06/18/86	2261	07/02/86	-0-	464.00	-0-	
Floyd Brown	06/26/86-06/29/86	2297	07/08/86	201.43	-0-	350.47	
	06/26/86	2425	08/05/86	8.50	-0-	-0-	
Floyd Brown	06/16/86-06/30/86	Report	06/25/86				1,185.92
Floyd Brown	07/01/86-07/15/86	Report	07/15/86				1,185.92
Inter. Nat. Tours	07/16/86-07/17/86	2370	07/24/86	-0-	290.00	-0-	
HT. FT. DSM	07/16/86-07/17/86	2392	07/28/86	138.07	-0-	49.90	
Floyd Brown	07/16/86-07/17/86	2425	08/05/86	134.81	-0-	-0-	
HT. FT. DSM	07/22/86-07/24/86	2397	07/28/86	120.05	-0-	-0-	
Floyd Brown	07/22/86-07/23/86	2425	08/05/86	138.04	-0-	-0-	
Fed - Exp	07/23/86	2450	08/08/86	23.00	-0-	-0-	
Inter. Nat. Tours	07/22/86	2430	08/05/86	-0-	247.00	-0-	
Burlington Ind.	07/26/86	2377	07/25/86	-0-	903.00	-0-	
Floyd Brown	07/15/86-07/31/86	Report	08/01/86				1,185.92
Floyd Brown	08/03/86-08/04/86	2506	07/03/86	51.56	-0-	14.00	
Inter. Nat. Tours	08/03/86	2468	08/12/86	-0-	480.00	-0-	
HT. FT. DSM	08/04/86	2487	08/14/86	105.14	-0-	-0-	
Floyd Brown	08/01/86-08/15/86	Report	08/15/86				1,185.92
Inter. Nat. Tours	08/18/86	2430	08/05/86	-0-	370.00	-0-	
Floyd Brown	08/19/86-08/23/86	2584	09/02/86	354.85	-0-	-0-	
HT. FT. DSM	08/19/86-08/23/86	2814	09/30/86	284.99	-0-	-0-	

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Payee	Dates	Check #	Check Date	Iowa Allocable Amount	Non-Allocable Iowa Amount	Other Amount	Salary
Inter. Nat. Tours	08/27/86-08/30/86	2586	09/02/86	-0-	819.00	-0-	
Floyd Brown	08/27/86-08/30/86	2587	09/02/86	217.81	-0-	48.00	
Floyd Brown	08/29/86	2766	09/24/86	118.56	-0-	787.77	
HT. FT. DSM	08/27/86-08/30/86	2653	09/08/86	183.27	-0-	-0-	
Floyd Brown	08/15/86-08/31/86	Report	08/29/86				1,185.92
Floyd Brown	09/01/86-09/15/86	Report	09/15/86				1,185.92
Floyd Brown	09/17/86-09/20/86	2769	09/23/86	266.22	-0-	-0-	
Inter. Nat. Tours	09/17/86	2833	10/01/86	-0-	440.00	-0-	
HT. FT. DSM	09/17/86-09/19/86	3370	11/18/86	103.86	-0-	-0-	
Floyd Brown	09/16/86-10/01/86	Report	10/01/86				1,185.92
HT. FT. DSM	10/08/86-10/10/86	3370	11/18/86	91.18	-0-	-0-	
Floyd Brown	10/08/86-10/10/86	2959	10/15/86	167.21	-0-	-0-	
Inter. Nat. Tours	10/08/86	3071	10/22/86	-0-	480.00	-0-	
Floyd Brown	10/01/86-10/15/86	Report	10/15/86				1,185.92
HT. FT. DSM	10/15/86-10/17/86	3370	11/18/86	133.65	-0-	-0-	
Inter. Nat. Tours	10/15/86	3071	10/22/86	-0-	620.00	-0-	
HT. FT. DSM	10/20/86-10/22/86	3370	11/18/86	136.84	-0-	-0-	
Floyd Brown	10/19/86-10/20/86	3867	02/02/87	6.00	-0-	-0-	
Black Hawk Hotel	10/27/86-10/28/86	3272	11/04/86	47.64	-0-	-0-	
Floyd Brown	10/16/86-10/31/86	Report	11/01/86				1,185.92
Floyd Brown	11/01/86-11/15/86	Report	11/15/86				1,185.92
Floyd Brown	11/24/86-11/26/86	3487	12/05/86	170.67	-0-	-0-	
Inter. Nat. Tours	11/24/86	3515	12/26/86	-0-	480.00	-0-	
Floyd Brown	11/16/86-11/30/86	Report	11/26/86				1,185.92

Payee	Dates	Check #	Check Date	Iowa Allocable Amount	Non-Allocable Iowa Amount	Other Amount	Salary	Commission Det'd IA Allocable
Inter. Nat. Tours	12/04/86-12/07/86	3595	12/22/86	-0-	250.00	-0-		
Floyd Brown	12/06/86	3867	02/02/87	61.09	-0-	-0-		
Inter. Nat. Tours	12/11/86-12/12/86	3595	12/22/86	-0-	480.00	-0-		
Floyd Brown	12/11/86-12/12/86	3867	02/02/87	8.00	-0-	-0-		
Floyd Brown	12/01/86-12/15/86	Report	12/15/86				1,185.92	
Floyd Brown	12/15/86-12/31/86	Report	01/01/87				1,288.92	
Floyd Brown	01/12/87-01/13/87	3867	02/02/87	57.98	-0-	-0-		
Floyd Brown	01/01/887-01/15/87	Report	01/15/87				1,288.92	
Floyd Brown	01/17/87	3867	02/02/87	5.25	-0-	-0-		
Inter. Nat. Tours	01/21/87	3871	02/03/87	-0-	328.00	-0-		
Floyd Brown	01/23/87	3867	02/02/87	7.00	-0-	-0-		
Floyd Brown	01/16/87-01/31/87	Report	02/01/87				1,288.92	
Floyd Brown	02/01/87-02/15/87	Report	02/13/87				1,288.00	644.00
Black Hawk Hotel	02/22/87-02/23/87	4236	03/23/87	41.42	-0-	-0-		41.42
Floyd Brown	02/16/87-02/28/87	Report	02/27/87				1,288.92	1,288.92
Total Salary and Documented Expenses				8,591.71	9,771.00	2,865.52	27,790.24	1,974.34
From Reports Only			10/01/86	125.94				
			10/10/86	451.15				
			11/06/86	107.95				
			01/19/87	119.42				
			02/10/87	527.30				
			03/18/87	338.69				
TOTAL				$10,262.16	$9,771.00	$2,865.52	$27,790.24	1,974.34

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Floyd Brown

Commission Determined Iowa Allocable	Iowa Non-Allocable	Total Activity
$1,974.34	$-0-	$1,974.34

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DOLE FOR PRESIDENT
Campaign America Expenses -
Tom Synhorst

Payee	Dates	Check #	Check Date	Iowa Allocable Amount	Non-Allocable Iowa Amount	Other Expenses	Salary
Tom Synhorst	04/01/86-05/31/86	Report	06/23/86				$ 2,000.00
Tom Synhorst	06/01/86-06/30/86	Report	07/01/86				1,000.00
Tom Synhorst	07/01/86-07/31/86	Report	07/31/86				1,000.00
Tom Synhorst	08/01/86-08/31/86	Report	08/29/86				1,000.00
Tom Synhorst	09/01/86-09/31/86	Report	10/06/86				1,000.00
Federal Express	10/23/86	3293	11/05/86	14.00	-0-	-0-	
Tom Synhorst	10/01/86-10/31/86	Report	11/01/86				1,000.00
Tom Synhorst	11/01/86-11/30/86	Report	12/02/86				1,000.00
Tom Synhorst	12/01/86-12/31/86	Report	01/07/87				1,000.00
Int. Nat. Tours	12/11/86	3595	12/22/86	-0-	390.00	-0-	
Tom Synhorst	01/01/87-01/15/87	Report	01/15/87				1,507.52
Tom Synhorst	01/08/87-01/13/87	3792	01/21/87	86.21	-0-	69.90	
Avis Rent-a-Car	01/08/87-01/13/87	3924	02/10/87	87.97	-0-	-0-	
Int. Nat. Tours	01/08/87	3803	01/22/87	-0-	278.00	-0-	
Tom Synhorst	01/16/87-01/31/87	Report	02/01/87				1,507.52
Int. Nat. Tours	01/19/87*/	3803	01/22/87	-0-	390.00	-0-	

*/ See Federal Express delivery to Hotel FT DSM 1/22/87.

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DOLE FOR PRESIDENT
Campaign America Expenses -
Tom Synhorst

Payee	Dates	Check #	Check Date	Iowa Allocable Amount	Non-Allocable Iowa Amount	Other Amount	Salary	Commission Det'd IA Allocable
Hotel FT. DSM	01/27/87-01/30/87	4235	03/23/87	706.77	-0-	-0-		
Federal Express	01/28/87	3973	02/18/87	11.00	-0-	-0-		
Tom Synhorst	01/27/87-01/29/87	4057	02/26/87	229.08	-0-	-0-		
Int. Nat. Tours	01/30/87	3871	02/03/87	-0-	215.00	-0-		
Tom Synhorst	02/01/87-02/15/87	Report	02/13/87				1,507.52	753.76
Tom Synhorst	02/02/87-02/07/87	4073	02/26/87	341.69	-0-	-0-		
Int. Nat. Tours (Flight to Cedar Rapids)	02/03/87	3891	02/03/87	-0-	518.00	-0-		
Tom Synhorst	02/16/87-02/17/87	Report	02/22/87				1,455.52	1,455.52
Tom Synhorst	02/10/87-02/13/87	4044	02/25/87	372.37	-0-	-0-		372.37
Int. Nat. Tours	02/10/87	4018	02/20/87	-0-	696.00	-0-		
Tom Synhorst	02/18/87-02/24/87	4164	03/12/87	557.90	-0-	-0-		557.90
Int. Nat. Tours	02/18/87	4109	03/04/87	-0-	390.00	-0-		
Blackhawk Hotel	02/22/87-02/23/87			41.42	-0-	-0-		41.42
Int. Nat. Tours	03/03/87	4109	03/04/87	-0-	390.00	-0-		
Tom Synhorst		Report	04/16/87	262.29				
Grand Total				$2,710.70	$3,267.00	$ 69.90	$14,978.08	3,180.97

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Tom Synhorst

Commission Determined Iowa Allocable	Iowa Non-Allocable	Total Activity
$3,180.97	$1,476.00	$4,656.97

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DOLE FOR PRESIDENT
Campaign America Expenses -
Iowa Staff

Payee	Dates	Check #	Check Date	Iowa Allocable Amount	Non-Allocable Iowa Amount	Other Expenses	Salary
			JANE VOIGHTS				
Jane Voights	06/15/86-06/30/86	2290	07/07/86				$ 400.00
Jane Voights	06/10/86-06/18/86	2343	07/11/86	$288.54			
HT FT DSM	06/20/86-06/21/86	2277	07/03/86	176.06			
Jane Voights	06/26/86-06/29/86	2905	10/09/86	103.36			
Jane Voights	06/15/86-07/15/86	2905	10/09/86	339.26			
Jane Voights	07/01/86-07/31/86	2454	08/11/86				800.00
Jane Voights	07/10/86-07/19/86	2455	08/11/86	118.57			
HT FT DSM	07/16/86-07/17/86	2392	07/28/86	49.90			
Jane Voights	07/13/86-07/28/86	2456	08/11/86	641.45			
HT FT DSM	07/24/86	2792	09/25/86	72.29			
HT FT DSM	07/26/86-07/27/86	2429	08/07/86	55.14			
Jane Voights	August - September	3165	10/28/86	60.08			
Jane Voights	08/01/86-08/31/86	Report	08/29/86				800.00
HT FT DSM	08/04/86-08/05/86	2485	08/14/86	93.06			
Jane Voights	08/03/86-08/05/86	2905	10/09/86	207.68			
Jane Voights	10/25/86-10/28/86	3378	11/18/86	319.20			
Int. Nat. Tours	10/25/86	3212	10/29/86	525.00			
TOTAL Jane Voights				$3,049.89	-0-	-0-	$2,000.00

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DOLE FOR PRESIDENT
Campaign America Expenses -
Iowa Staff

Payee	Dates	Check #	Check Date	Iowa Allocable Amount	Non-Allocable Iowa Amount	Other Expenses	Salary
			JOHN REHMANN				
John Rehmann	Unknown	1917	04/30/86				$ 500.00
John Rehmann	04/04/86-05/26/86	2152	06/16/86	$ 109.22			225.00
John Rehmann	07/25/86-09/01/86	3335	11/11/86				250.00
John Rehmann	Lease Negot.	3335	11/11/86				100.00
John Rehmann	07/25/86-09/01/86	3335	11/11/86	125.18			
John Rehmann	09/01/86-10/01/86	3336	11/11/86	338.00		4.70	
John Rehmann	10/01/86-10/31/86	3440	11/25/86	118.75			337.50
John Rehmann	11/01/86-01/19/87	3844 and 4059	01/29/87 and 02/26/87	275.78			1,350.00
TOTAL John Rehmann				$966.93	-0-	$ 4.70	$2,762.50

DOLE FOR PRESIDENT
Campaign America Expenses - Iowa Staff

Payee	Dates	Check #	Check Date	Iowa Allocable Amount	Non-Allocable Iowa Amount	Other Expenses	Salary	Commission Det'd IA Allocable
			CAL HULTMAN					
Cal Hultman	09/01/86-09/15/86	2804	09/26/86				$ 750.00	
Cal Hultman	09/02/86-09/05/86	2782	09/24/86	$ 259.76				
Cal Hultman	09/07/86-09/12/87	2781	09/24/86	280.84				
Cal Hultman	09/16/86-10/31/86	3032	10/17/86				2,250.00	
Cal Hultman	09/16/86-09/19/86	2818	09/30/86	188.70				
Cal Hultman	09/22/86-09/26/86	2950	10/15/86	433.36				
Cal Hultman	09/30/86	2951	10/15/86	114.63				
Cal Hultman	10/05/86-10/15/86	3379	11/18/86		6.61			
Cal Hultman	10/11/86	3139	10/28/86	85.22				
Cal Hultman	10/22/86	3138	10/28/86	88.99				
Cal Hultman	10/28/86	3304	11/06/86	48.20				
Cal Hultman	11/01/86-11/15/86	Report	11/01/86				750.00	
Cal Hultman	11/16/86-11/30/86	3374	11/01/86				750.00	
Cal Hultman	11/18/86	3581	12/18/86	16.30				
Cal Hultman	12/01/86-12/15/86	Report	12/02/86				750.00	
Cal Hultman	12/16/86-12/31/86	3554	12/15/86				750.00	
Cal Hultman	01/01/87-01/15/87	Report	01/07/87				750.00	
Cal Hultman	01/16/87-01/31/87	3747	01/15/87				750.00	
Cal Hultman	02/01/87-02/15/87	Report	02/02/87				750.00	375.00
Cal Hultman	02/16/87-02/28/87	Report	03/02/87				750.00	750.00
Cal Hultman	03/01/87-03/31/87	4413	04/28/87				1,500.00	1,500.00
TOTAL Cal Hultman				$1,516.00	$6.61	-0-	$10,500.00	2,625.00

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DOLE FOR PRESIDENT
Campaign America Expenses -
Iowa Staff

Payee	Dates	Check #	Check Date	Iowa Allocable Amount	Non-Allocable Iowa Amount	Other Expenses	Salary
			PENNY BROWN				
Int. Nat. Tours	10/06/86	3071	10/22/86		$ 491.00		
Penny Brown	10/07/86	2947	10/15/86		83.13		
Int. Nat. Tours	11/20/86	3871	12/26/86		360.00		
Penny Brown	11/20/86-11/21/86	3564	12/17/86		120.47		
Penny Brown	12/01/86-12/31/86	3540	12/09/86				$ 2,400.00
Penny Brown	12/03/86-12/09/86	3645	01/07/87	92.42			
Penny Brown	01/01/87-01/31/87	3789	01/21/87				2,400.00
TOTAL Penny Brown				$ 92.42	$1,054.60	-0-	$ 4,800.00

DOLE FOR PRESIDENT
Campaign America Expenses -
Iowa Staff

Payee	Dates	Check #	Check Date	Iowa Allocable Amount	Non-Allocable Iowa Amount	Other Expenses	Salary	Commission Det'd IA Allocable
JEFF NELSON								
Jeff Nelson		3334	11/11/86				$1,750.00	
Jeff Nelson		3811	01/23/87				1,750.00	
TOTAL Jeff Nelson				-0-	-0-	-0-	$3,500.00	
CAROL LEHMKUHL								
Carol Lehmkuhl	February 1987	4103	03/04/87	-0-	-0-	-0-	1,200.00	942.86
WYTHE WILLEY								
Wythe Willey	01/01/87-02/28/87	4263	03/31/87	-0-	-0-	-0-	4,000.00	1,491.53
Iowa Staff Totals				$5,625.24	$1,061.21	$ 4.70	$28,762.50	5,059.39

Total Iowa Amount	$ 35,448.95	
Less: Iowa Non-Allocable	1,061.21	
Iowa Allocable Amount	$ 34,387.74	5,059.39
		-0-
		5,059.39

DOLE FOR PRESIDENT
Campaign America Records -
Iowa Miscellaneous Expenses

Payee	Dates	Check #	Check Date	Iowa Allocable Amount	Non-Allocable Iowa Amount	Other Expenses
Joseph Barret	03/23/86-03/26/86	1703				
		1814	04/08/86	$ 168.57		
Grassley '86 Committee	N/A	3794	01/21/87	1,100.00		
Postmaster	N/A	2153	06/17/86	1,170.00		
	N/A	2359	07/23/86	132.00		
	N/A	2361	07/23/86	102.00		
HT. FT. DSM for S. Sego	05/14/86-05/16/86	2095	06/04/86	91.15		
Elaine Smith	02/23/87	4261	03/31/87	188.56		
Torchmark Corp.	12/23/86	3594	12/22/86		649.00	649.00
Watergate Terrace	12/16/86	3711	01/13/86	72.83		
	12/16/86	4162	03/12/86	72.82		
TOTALS				$3,097.93	649.00	649.00

Total Iowa Amount	$3,746.93
Less Non-Allocable Amount	649.00
Iowa Allocable Amount	$3,097.93

DOLE FOR PRESIDENT
REVIEW OF CAMPAIGN AMERICA PAC RECORDS
SCHEDULE OF EVENTS AND MEETINGS HELD IN NEW HAMPSHIRE BETWEEN:
3/02/86-2/16/87

(SEE EXPLANATION OF COLUMN HEADINGS ON PAGE 5 of 5)

EVENTS:

DESCRIPTION OF EVENT/ DATE OF EVENT/ PAYEE	CHECK # & CHECK DATE	NH ALLOCABLE AMOUNT	NH TRVL-NON ALLOCABLE	OTHER EXPENSES	MEMO ENTRY EXPENSES	ATTENDEES @ EVENT
1986						
3/02/86						ATTENDEES:
MEETING @ HOLIDAY INN MANCHESTER, NH						PAUL RUSSO
						KIRK CLINKENBEARD
						SENATOR DOLE
PAUL RUSSO	1638/3-12	14.50		362.66		
KIRK CLINKENBEARD	1639/3-12	656.70				
US JET AVIATION	1694/3-19		1,567.79	3,135.58		
SUBTOTALS:		671.20	1,567.79	3,498.24		
6/13/86-6/14/86						ATTENDEES:
SENATOR RUDMAN EVENT-NH						BRIAN BERRY
						SENATOR DOLE & STAFF
						PAUL RUSSO
BRIAN BERRY	2223/6-27	70.49		70.49		
BRIAN BERRY	2174/6-23	93.45		112.00		
PAUL RUSSO	2248/6-30				495.06	
AMERICAN FINANCIAL CORPORATION	2178/6-23		750.00	1,800.00		
INTERNATIONAL TOURS ALEXANDRIA	2144/6-16					
BRIAN BERRY	"		115.00			
US TOBACCO	2180/6-23		2,351.00	2,711.00		
SUBTOTALS:		163.94	3,216.00	4,693.49	495.06	
6/18/86-6/20/86						ATTENDEES:
MEETING/EVENT UNKNOWN @ MANCHESTER						DONALD DEVINE
						PAUL RUSSO
AMERICAN EXPRESS FOR:	2294/7-08					
DONALD DEVINE	"	189.85				
DONALD DEVINE	"			201.36		
PAUL RUSSO	2249/6-30				96.57	
CAREY OF BOSTON FOR:	2289/7-07					
DONALD DEVINE	"	202.72				
SUBTOTALS:		392.57		201.36	96.57	

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DESCRIPTION OF EVENT/ DATE OF EVENT/ PAYEE	CHECK # & CHECK DATE	NH ALLOCABLE AMOUNT	NH TRVL-NON ALLOCABLE	OTHER EXPENSES	MEMO ENTRY EXPENSES	ATTENDEES @ EVENT
8/24/86-8/29/86						
PHOTO OPPORTUNITY DALE BANQUET (8/26/86)						ATTENDEES:
SEABROOK LUNCHEON-(8/27/86)						CHRIS CUSHING
INTERNATIONAL TOURS ALEXANDRIA	2586/9-02					BRIAN BERRY
CHRIS CUSHING	,,					ELIZABETH DOLE
CHRIS CUSHING	,,		231.00			SENATOR DOLE
BRIAN BERRY	,,		149.00			SUZANNE NIEMELA
BRIAN BERRY	,,		81.00			PAUL RUSSO
US TOBACCO	2537/8-22		279.00			MIKE GLASSNER
SKYMASTER AIR TAXI FOR:	2710/9-17		877.00			JOHN CUBBAGE
'ELIZABETH DOLE PLUS ONE'	,,	614.60				PETER STAHL
NEW HAMPSHIRE HELICOPTERS, INC	2657/9-10	1,636.50				
AMERICAN EXPRESS FOR:	2878/10-07					
DONALD DEVINE	,,	340.11		111.40		
AMERICAN EXPRESS FOR:	2623/9-05					
DONALD DEVINE	,,	151.27		410.12		
ALEXANDRIA POSTMASTER	2544/8-26	10.75				
CAREY OF BOSTON FOR:	2649/9-08					
DONALD DEVINE	,,	171.08				
BALD PEAK COLONY CLUB FOR:	2667/9-10	1,873.60				
SENATOR DOLE	,,					
ELIZABETH DOLE	,,					
MIKE GLASSNER	,,					
JOHN CUBBAGE	3235/10-30	715.30	24.60			
BALD PEAK COLONY CLUB	2788/9-25	266.00				
RAMADA INN	2604/9-03	419.12				
PETER STAHL	3028/10-17	34.96				
GREENHOUSE RESTAURANT	3342/11-12	900.00				
TONI PAPPAS & ASSOCIATES	2819/9-30	601.00				
PAUL RUSSO	2704/9-17				1,469.71	
PAUL RUSSO	2845/10-07				1,289.37	
SUZANNE NIEMELA	2849/10-03				814.20	
SUBTOTALS:		7,734.29	1,641.60	521.52	3,573.28	
10/05/86						
NEW HAMPSHIRE REPUBLICAN CONVENTION						ATTENDEES:
WILLIAM B LACY	3340/11-11	198.23				BILL LACY
NEW HAMPSHIRE HIGHWAY HOTEL	3207/10-29	149.62		77.78		SUZANNE NIEMELA
INTERNATIONAL TOURS ALEXANDRIA	3071/10-22					
B LACY	,,		188.00			
SUBTOTALS:		347.85	188.00	77.78		

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DESCRIPTION OF EVENT/ DATE OF EVENT/ PAYEE	CHECK # & CHECK DATE	NH ALLOCABLE AMOUNT	NH TRVL-NON ALLOCABLE	OTHER EXPENSES	MEMO ENTRY EXPENSES	ATTENDEES @ EVENT
10/24/86						
PRESS CONFERENCE @ CONCORD NH						ATTENDEES: SUZANNE NEIMELA SENATOR DOLE
SUZANNE NIEMELA	3500/12-05				140.70	
SUBTOTALS:					140.70	
12/12/86-12/13/86						
SENATOR DOLE ADDRESSES THE PORTSMOUTH ROTARY CLUB 12/12						ATTENDEES:
SENATOR DOLE ADDRESSES THE UNIVERSITY OF NH AT COMMENCEMENT DURHAM, NH 12/13						SENATOR DOLE SUZANNE NEIMELA
HOLIDAY INN MANCHESTER	3664/1-07	202.75				
HOLIDAY INN MANCHESTER	3571/12-18	108.85				
AMERICAN FINANCIAL GROUP	3606/12-23		902.00	902.00		
NEW HAMPSHIRE HELICOPTER, INC	3684/1-07	795.00				
NEW HAMPSHIRE HELICOPTER, INC	3685/1-07	932.86				
SUZANNE NEIMELA	3651/1-07				500.69	
NEW ENGLAND CENTER FOR CONTINUING EDUCATION FOR: SUZANNE NIEMELA	3650/1-07				121.70	
SUBTOTALS:		2,039.46	902.00	902.00	622.39	
1987						
1/24/87-1/26/87						ATTENDEES:
BRUNCH FOR 67 (1/25/87)						JEFF MANSFIELD SUZANNE NEIMELA SENATOR DOLE BRIAN BERRY
JEFF MANSFIELD	4001/2-20	123.32				
HOLIDAY INN	3786/1-20	100.00				
SHERATON TARA	3772/1-19	195.00				
RED JACKET MOUNTAIN VIEW	3976/2-18	572.18				
NEW HAMPSHIRE HELICOPTERS, INC	3884/2-03	2,012.50				
US TOBACCO	3808/1-23		1,150.00			
INTERNATIONAL TOURS ALEXANDRIA	3871/2-03					
BRIAN BERRY	"		318.00			
SUZANNE NIEMELA	3914/2-10				828.48	
SUBTOTALS:		3,003.00	1,468.00		828.48	

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DESCRIPTION OF EVENT/ DATE OF EVENT/ PAYEE	CHECK # & CHECK DATE	NH ALLOCABLE AMOUNT	NH TRVL-NON ALLOCABLE	OTHER EXPENSES	MEMO ENTRY EXPENSES	ATTENDEES @ EVENT
2/16/87						
SENATOR DOLE ADDRESSES THE KEENE, NEW HAMPSHIRE ROTARY CLUB BREAKFAST FOR 60 PEOPLE						ATTENDEES: SUZANNE NEIMELA, BRIAN BERRY, SENATOR DOLE
THE BOILERHOUSE	4150/3-11	1,185.10				
RAMADA INN	3905/2-10	250.00				
ROCKINGHAM COUNTY REPUBLIUCAN COMMITTEE	4048/2-25	150.00				
JOHN MULAZZI	4166/3-12	88.30				
INTERNATIONAL TOURS ALEXANDRIA BRIAN BERRY	4018/2-20		139.00			
SUZANNE NIEMELA	4163/3-12				396.99	
SUBTOTALS:		1,673.40	139.00		396.99	
SUBTOTALS:	3/02/86	671.20	1,567.79	3,498.24		
	6/13/86	163.94	3,216.00	4,693.49	495.06	
	6/18/86	392.57		201.36	96.57	
	8/24/86	7,734.29	1,641.60	521.52	3,573.28	
	10/05/86	347.85	188.00	77.78		
	10/24/86				140.70	
	12/12/86	2,039.46	902.00	902.00	622.39	
	1/24/86	3,003.00	1,468.00		828.48	
	2/16/86	1,673.40	139.00		396.99	
GRAND TOTALS:		16,025.71	9,122.39	9,894.39	6,153.47	$41,195.96

$25,148.10

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DOLE FOR PRESIDENT

Definition of Columns:

- New Hampshire Allocable Amount - These CA expenses are allocable to the New Hampshire spending limitation. Since CA personnel are not Committee employees, the "5 day rule" is not applied.

- New Hampshire Travel Non-Allocable - These expenses relate to CA New Hampshire activity but are for interstate travel, interstate telephone expenses, etc., and as such are not allocable to the New Hampshire spending limitation.

- Other Expenses - These expenses do not relate to New Hampshire but were paid with a CA check which also paid expenses related to New Hampshire.

- Memo Entry Expenses - These expenses are included in amounts discussed with respect to the payee. They are shown here only to provide a more complete picture of the event and attendees.

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DOLE FOR PRESIDENT
Campaign America Expenses -
Paul Russo

Payee	Dates	Check #	Check Date	NH Allocable Amount	Non-Allocable NH Amount	Other Expenses	Salary
Paul Russo	06/03/86	2247	06/30/86	$ 55.59	$ 11.00	-0-	
Paul Russo	06/13/86-06/15/86	2248	06/30/86	477.56	17.50	-0-	
Inter. Nat. Tours	06/13/86	2144	06/16/86	-0-	115.00	-0-	
Paul Russo	06/19/86-06/20/86	2249	06/30/86	87.57	9.00	-0-	
Paul Russo	06/01/86-06/30/86	Report	07/01/86				$ 2,500.00
Paul Russo	07/01/86-07/03/86	2355	07/21/86	401.51	17.50	-0-	
Inter. Nat. Tours	06/30/86	2261	07/02/86	-0-	149.00	-0-	
Paul Russo	07/01/86-07/31/86	Report	07/30/86				2,500.00
Paul Russo	07/16/86-07/17/86	2570	08/28/86	278.97	16.00	-0-	
Inter. Nat. Tours	07/16/86	2370	07/24/86	-0-	196.00	-0-	
Paul Russo	07/23/86-07/24/86	2438	08/07/86	282.69	8.00	-0-	
Inter. Nat. Tours	07/23/86	2468	08/12/86	-0-	161.00	-0-	
Paul Russo	08/11/86-08/13/86	2521	08/22/86	508.16	16.50	-0-	
Inter. Nat. Tours	08/11/86	2547	08/26/86	-0-	197.49	-0-	
Paul Russo	08/18/86-08/24/86	2845	10/07/86	1,279.87	9.50	-0-	
Paul Russo	08/24/86-08/29/86	2704	09/17/86	1,469.71	-0-	-0-	
Inter. Nat. Tours	08/18/86	2547	08/26/86	-0-	196.00	-0-	
Paul Russo	08/01/86-08/31/86	Report	09/05/86				2,500.00
TOTAL				$4,841.63	$1,119.49	$ -0-	$7,500.00

New Hampshire Allocable	$12,341.63
New Hampshire Non-Allocable	1,119.49
Total	$13,461.12

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DOLE FOR PRESIDENT
Campaign America Expenses -
Suzanne Niemela

Payee	Dates	Check #	Check Date	NH Allocable Amount	Non-Allocable NH Amount	Other Expenses	Salary
Suzanne Niemela	07/01/86-07/31/86	2481	08/14/86				$ 1,500.00
Abt Associates	7/86-8/86	3208	10/29/86	-0-	141.65	-0-	
Suzanne Niemela	08/24/86-08/29/86	2849	10/03/86	767.70	-0-	46.50	
Suzanne Niemela	08/01/86-08/31/86	2643	09/08/86				1,500.00
Suzanne Niemela	09/01/86-09/30/86	2870	10/06/86				1,500.00
Suzanne Niemela	09/17/86-09/27/86	2946	10/15/86	217.41	-0-	173.25	
Suzanne Niemela	09/28/86-10/04/86	3115	10/27/86	87.10	-0-	-0-	
Suzanne Niemela	10/05/86-10/10/86	3167	10/28/86	137.93	-0-	-0-	
Suzanne Niemela	10/14/86-10/17/86	3166	10/28/86	106.57	-0-	-0-	
Suzanne Niemela	10/20/86-10/25/86	3500	12/05/86	255.77	-0-	-0-	
Concord Answering Service	10/01/86-10/31/86	3294	11/05/86	50.00	-0-	-0-	
Suzanne Niemela	11/01/86-11/30/86	Report	12/02/86				1,500.00
Copy Craft	10/30/86	3295	11/05/86	39.00	-0-	-0-	
Suzanne Niemela	11/02/86-11/08/86	?	?	60.23	-0-	-0-	
Suzanne Niemela	11/09/86-11/15/86	?	?	42.71	-0-	-0-	
Suzanne Niemela	11/23/86-11/29/86	3653	01/07/87	58.68	-0-	-0-	

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DOLE FOR PRESIDENT
Campaign America Expenses -
Suzanne Niemela

Payee	Dates	Check #	Check Date	NH Allocable Amount	Non-Allocable NH Amount	Other Expenses	Salary
Concord Answering Service	12/01/86-12/31/86	3663	01/07/87	50.00	-0-	-0-	
N.E. Center for Continuing Educ.	12/13/86	3650	01/07/87	121.70	-0-	-0-	
Suzanne Niemela	12/07/86-12/13/86	3651	01/07/87	622.32	-0-	-0-	
Suzanne Niemela	12/01/86-12/31/86	3531	12/09/86				1,500.00
Concord Answering Service	01/01/87-01/31/87	3754	01/15/87	104.00	-0-	-0-	
Suzanne Niemela	8/86	3570	12/18/86	460.00	-0-	-0-	
Suzanne Niemela	01/11/87-01/25/87	3914	02/10/87	1,205.94	-0-	-0-	
Suzanne Niemela	01/01/87-01/31/87	Report	01/07/87				1,500.00
Suzanne Niemela	02/01/87-02/28/87	Report	01/30/87				1,500.00
Suzanne Niemela	02/13/87	3951	02/13/87	500.00	-0-	-0-	
Suzanne Niemela	02/09/87-02/14/87	4167	03/12/87	139.88	-0-	-0-	
Suzanne Niemela	02/15/87-02/21/87	4163	03/12/87	432.61	-0-	-0-	
Suzanne Niemela	03/01/87-03/31/87	Report	03/02/87				1,500.00
<u>Expenses from CA Reports</u>							
Suzanne Niemela		Report 3500	12/05/86	358.71	-0-	-0-	

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DOLE FOR PRESIDENT
Campaign America Expenses -
Suzanne Niemela

Payee	Dates	Check #	Check Date	NH Allocable Amount	Non-Allocable NH Amount	Other Expenses	Salary
Suzanne Niemela		Report 2564	08/29/86				1,500.00
Less: Check 3531 from Page 1, Line 39 Which Does Not Appear to Have Cleared							(1,500.00)
				$5,818.26	$141.65	$219.75	$12,000.00

Total New Hampshire Allocable	$17,818.26
New Hampshire Non-Allocable	141.65
Other	219.75
TOTAL	$18,179.66

DOLE
PRESIDENT

1828 L Street, N.W. • Suite 805
Washington, D.C. 20036
(202) 223-9400
(TDD) (202) 223-9400

January 21, 1988

Schwart
2780 Morris Ave
Union, NJ 07083

Dear Schwart:

Thank you for your generous contribution. In order to submit your contribution for federal matching funds, the Federal Election Commission requires that we obtain additional information. Your contribution was drawn on an account maintained by a business entity. We must verify that your contribution represents your personal funds. It would be helpful if you would read the statement below and if it is accurate, please sign and return it to the Committee in the enclosed postage paid envelope at your earliest convenience.

Again, thank you for your support.

PB 2/9

Sincerely,

Nancy A. Rodes

Dole for President
Committee

I made a contribution of $2,000.00, deposited December 31, 1987, and drawn on check #895 of the account identified as Bertram Associates. This is to verify that this business account is not incorporated. The contribution represents my personal funds. The full amount listed above should be attributed to me as it does not represent contributions from more than one person.

Name HOWARD SCHWARTZ

Home Address 21 VANDERBILT DRIVE

City LIVINGSTON NJ

State _____ Zip _____

Your signature _____
(please do not print)

ID: U07083 SCHW 780 1 Bseq: 009752-0006 Ltr: 10

Paid for by Dole for President Committee

23040955644

17

DOLE
PRESIDENT

1828 L Street, N.W. • Suite 805
Washington, D.C. 20036
(202) 223-9400
(TDD) (202) 223-9400

February 18, 1988

Mr. Bruce W. Solomon
3401 Flagler Avenue
Key West, FL 33040

Dear Mr. Bruce W. Solomon:

Thank you for your generous contribution. In order to submit your contribution for federal matching funds, the Federal Election Commission requires that we obtain additional information. Your contribution was drawn on an account with a designation indicating that it might contain funds other than your personal funds. We must verify that your contribution represents only your personal funds. It would be helpful if you would read the statement below and if it is accurate, please sign and return it to the Committee in the enclosed postage paid envelope at your earliest convenience.

Again, thank you for your support.

Sincerely,

Dole for President
Committee

I made a contribution of $115.00, deposited February 5, 1988, and drawn on check #1300 of the account identified as Bruce W. Solomon Dc Pa. This is to verify that the contribution described above is drawn on an account containing only my personal funds. The account is not funded for my use on an unreimbursed basis by an incorporated entity.

Name BRUCE W. Solomon

Home Address 3702 Paula Ave

City keywest

State FL Zip 33040

Your signature _____
(please do not print)

FEB 27 1988

ID: U33040 SLMN 401 B 1 Bseq: 010973-0007 Ltr: 12

Paid for by Dole for President Committee

93040955645

** PLEASE SIGN & RETURN TODAY

DOLE
PRESIDENT

1828 L Street, N.W. • Suite 805
Washington, D.C. 20036
(202) 223-9400
(TDD) (202) 223-9400

April 29, 1988

Mr. R. I. Roberts
Dale Hollow Lake Rt 1
Celina, TN 38551

Dear Mr. R. I. Roberts:

Thank you for your contribution to Senator Dole's Presidential campaign.

Now that Senator Dole has withdrawn from the race, it is of the highest priority that the Dole for President Committee use every available resource to meet its financial obligations, enabling Senator Dole to concentrate on projecting his message of Party unity toward Republican victories in November.

If the statement below accurately reflects your contribution, please fill in your correct home address, sign the form and return it with the enclosed envelope. This will allow us to maximize your contribution through Federal Matching Funds. If you have previously received similar correspondence from the campaign, it is very important that each letter be signed and returned to the Committee without delay.

Thank you for your past support and assistance in helping us maximize your contribution to Senator Dole's campaign.

Sincerely,

James L. Hagen, Treasurer
Dole for President Committee, Inc.

RECEIVED MAY 3 1988

I made a contribution of $20.00, deposited on November 3, 1987, and drawn on check #46662 of the account identified as Cedar Hill Resort. This is to verify that the contribution described above is drawn on an account containing only my personal funds. The account is not funded for my use on an unreimbursed basis by an incorporated entity.

Name Richard I. Roberts

Home Address Rt - 1

City Celina State Tenn Zip 38551

Your signature R I Roberts
(Contributor's Signature)

ID: U38551 RBRT 001 R Paid for by Dole for President 007044-0004 Ltr: 12

930409556546

DOLE
PRESIDENT

1828 L Street, N.W. • Suite 805
Washington, D.C. 20036
(202) 223-9400
(TDD) (202) 223-9400

December 17, 1987

Mr. Vinal Smith
28 Harlow St
Bangor, ME 04401

Dear Mr. Vinal Smith:

Thank you for your recent contribution. However, Federal law requires that we obtain additional information before we can accept or submit for matching funds a contribution drawn on an account maintained by a business entity. If the statement below is accurate, will you please sign and return it to us at your earliest convenience?

Thank you for your help.

Sincerely,

Nancy A. Rode

Dole for President
Exploratory Committee

I made a contribution of $15.00, deposited November 5, 1987, and drawn on check #7864 of the account identified as Colonial Carpets. This is to verify that this business account is not incorporated. The contribution represents my personal funds as I am a member of the unincorporated business. The full amount listed above should be attributed to me as it does not represent contributions from more than one person.

Name Vinal Smith

Address 28 Harlow

City Bangor Me

State _____ Zip 04401

Your signature _____
(please do not print)

ID: U04401 SMTH 028 V 1 Bseq: 007203-0009 Ltr: 10

JAN 04 1988

Paid for by Dole for President Committee

23040955647

27

DOLE
PRESIDENT

1828 L Street, N.W. • Suite 805
Washington, D.C. 20036
(202) 223-9400
(TDD) (202) 223-9400

DEC 10 1987

November 24, 1987

Mr. Vinal Smith
28 Harlow St
Bangor, ME 04401

Dear Mr. Vinal Smith:

Thank you for your recent contribution. However, Federal law requires that we obtain additional information before we can accept or submit for matching funds a contribution drawn on an account maintained by a business entity. If the statement below is accurate, will you please sign and return it to us at your earliest convenience?

Thank you for your help.

Sincerely,

Nancy A. Roda

Dole for President
Exploratory Committee

I made a contribution of $15.00, deposited October 29, 1987, and drawn on check #7840 of the account identified as Colonial Carpets. This is to verify that this business account is not incorporated. The contribution represents my personal funds as I am a member of the unincorporated business. The full amount listed above should be attributed to me as it does not represent contributions from more than one person.

Name Vinal Smith

Address 28 Harlow

City Bangor

State Maine Zip 04401

Your signature _____
(please do not print)

mm

ID: U04401 SMTH 028 V 1 Bseq: 006835-0008 Ltr: 10

Paid for by Dole for President Committee

93040955648

BOB DOLE President

✓ ACF 11-5-87

October 21, 1987

Mr. Jack Conway
137 Washington Street
Norwell, MA 02061

Dear Mr. Jack Conway:

Thank you for your recent contribution. However, Federal law requires that we obtain additional information before we can accept or submit for matching funds a contribution drawn on an account maintained by a business entity. If the statement below is accurate, will you please sign and return it to us at your earliest convenience?

Thank you for your help.

Sincerely,

Dole for President
Exploratory Committee

I made a contribution of $300.00, deposited September 30, 1987, and drawn on check #7328 of the account identified as Columbia Management. This is to verify that this business account is not incorporated. The contribution represents my personal funds as I am a member of the unincorporated business. The full amount listed above should be attributed to me as it does not represent contributions from more than one person.

for John E. Conway

Name John E. Conway

Address 137 Washington St

City Norwell

State MA Zip 02061

Your signature J. J. Conway
(please do not print)

ID: U02061 CNWY 137 J 1 Bseq: 005482-0002 Ltr: 10

1828 L Street, N.W., Suite 805, Washington, D.C. 20036
(202) 223-9400
Paid for by Dole for President Exploratory Committee

C04095564 9

40

DOLE
PRESIDENT

1828 L Street, N.W. • Suite 805
Washington, D.C. 20036
(202) 223-9400
(TDD) (202) 223-9400

March 23, 1988

Mr. Dennis Bruhn
Schleswig, IA 51461

Dear Mr. Dennis Bruhn:

Thank you for your generous contribution. In order to submit your contribution for federal matching funds, the Federal Election Commission requires that we obtain additional information. Your contribution was drawn on an account maintained by a business entity. We must verify that your contribution represents your personal funds. It would be helpful if you would read the statement below and if it is accurate, please sign and return it to the Committee in the enclosed postage paid envelope at your earliest convenience.

Again, thank you for your support.

Sincerely,

Nancy A. Roda

Dole for President
Committee

I made a contribution of $100.00, deposited March 4, 1988, and drawn on check #1196 of the account identified as Denco-B Ltd. This is to verify that this business account is not incorporated. The contribution represents my personal funds. The full amount listed above should be attributed to me as it does not represent contributions from more than one person.

Name DENNIS R. BRUHN

Home Address Box 116

City SCHLESWIG

State IOWA Zip 51461

Your signature Dennis R Bruhn
(please do not print)

BRHN 3/21/4

APR 01 1988

ID: U51461 BRHN 000 D 1 Bseq: 012148-0008 Ltr: 10

Paid for by Dole for President Committee

93040955650

(41)

DOLE
PRESIDENT

1828 L Street, N.W. • Suite 805
Washington, D.C. 20036
(202) 223-9400
(TDD) (202) 223-9400

November 24, 1987

Mr. Dennis L. Douglas
2114 S Hatch
Spokane, WA 99203

Dear Mr. Dennis L. Douglas:

Thank you for your recent contribution. However, Federal law requires that we obtain additional information before we can accept or submit for matching funds a contribution drawn on certain types of personal accounts which bear a designation indicating the possibility that the account may contain funds other than your personal funds. If the statement below is accurate, will you please sign and return it to us at your earliest convenience?

Thank you for your help.

Sincerely,

Nancy A. Kada

Dole for President
Exploratory Committee

I made a contribution of $50.00, deposited November 2, 1987, and drawn on check #1613 of the account identified as Dennis L. Douglas Attorney. This is to verify that the contribution described above is drawn on an account that contains only my personal funds. The account is not funded for my use on an unreimbursed basis by an incorporated entity.

Name Dennis L. Douglas

Address 2114 S. Hatch

City Spokane,

State Wash. Zip 99203

Your signature Dennis L. Douglas
(please do not print)

ID: U99203 DGHL 114 D 1 Bseq: 007014-0009 Ltr: 12

Paid for by Dole for President Committee

12/9 D/S · DEC 09 1987

93040955651

DOLE
PRESIDENT

1828 L Street, N.W. • Suite 805
Washington, D.C. 20036
(202) 223-9400
(TDD) (202) 223-9400

November 13, 1987

Mr. Earl D. Merkel
Shields Bldg
Russell, KS 67665

Dear Mr. Earl D. Merkel:

Thank you for your recent contribution. However, Federal law requires that we obtain additional information before we can accept or submit for matching funds a contribution drawn on an account maintained by a business entity. If the statement below is accurate, will you please sign and return it to us at your earliest convenience?

Thank you for your help.

11/25

Sincerely,

Nancy Reda

Dole for President
Exploratory Committee

I made a contribution of $75.00, deposited October 23, 1987, and drawn on check #4450 of the account identified as Earl D. Merkel Md. This is to verify that this business account is not incorporated. The contribution represents my personal funds as I am a member of the unincorporated business. The full amount listed above should be attributed to me as it does not represent contributions from more than one person.

Name Earl D. Merkel M.D.

Address 1033 Parkside Ave.

City Russell, Kansas 67665 NOV 23 1987

State Kansas Zip 67665

Your signature _____
(please do not print)

ID: U67665 MRKL 000 E 1 Bseq: 006557-0029 Ltr: 10

Paid for by Dole for President Committee

23040955652

BOB DOLE President

October 21, 1987

Mr. Edward White
5950 Canoga Ave Ste 200
Woodland Hills, CA 91367

Dear Mr. Edward White:

Thank you for your recent contribution. However, Federal law requires that we obtain additional information before we can accept or submit for matching funds a contribution drawn on an account maintained by a business entity. If the statement below is accurate, will you please sign and return it to us at your earliest convenience?

Thank you for your help.

OCT 30 1987

Sincerely,

Dole for President
Exploratory Committee

I made a contribution of $1,000.00, deposited September 30, 1987, and drawn on check #2848 of the account identified as Edward White & Co. This is to verify that this business account is not incorporated. The contribution represents my personal funds as I am a member of the unincorporated business. The full amount listed above should be attributed to me as it does not represent contributions from more than one person.

Name EDWARD L. WHITE

Address 5950 CANOGA AVENUE, SUITE 200

City WOODLAND HILLS

State CA zip 91367

Your signature Edward L. White
(please do not print)

ID: U91367 WHTE 950 E 1 Bseq: 005399-0003 Ltr: 10

1828 L Street, N.W., Suite 805, Washington, D.C. 20036
(202) 223-9400
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11/5

93040955653

SS

DOLE
PRESIDENT

1828 L Street, N.W. • Suite 805
Washington, D.C. 20036
(202) 223-9400
(TDD) (202) 223-9400

November 18, 1987

Dr. Edwin D. Rathbun
610 W 11th St
Liberal, KS 67901

Dear Dr. Edwin D. Rathbun:

Thank you for your recent contribution. However, Federal law requires that we obtain additional information before we can accept or submit for matching funds a contribution drawn on certain types of personal accounts which bear a designation indicating the possibility that the account may contain funds other than your personal funds. If the statement below is accurate, will you please sign and return it to us at your earliest convenience?

Thank you for your help.

Sincerely,

Nancy A. Reda

Dole for President
Exploratory Committee

I made a contribution of $50.00, deposited October 27, 1987, and drawn on check #3845 of the account identified as Dr Edwin D. Rathbun Md. This is to verify that the contribution described above is drawn on an account that contains only my personal funds. The account is not funded for my use on an unreimbursed basis by an incorporated entity.

Name_____ Dr. E. D. Rathbun
Address_____ 610 West 11th Street
Liberal, KS 67901
City_____
State_____ Zip_____
Your signature_____
(please do not print)

ID: U67901 RTHB 610 E 1 Bseq: 006658-0033 Ltr: 12

DEC 07 1987

12/7

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930409556554

DOLE
PRESIDENT

1828 L Street, N.W. • Suite 805
Washington, D.C. 20036
(202) 223-9400
(TDD) (202) 223-9400

March 8, 1988

Dr. Eric W. Fonkalsrud, MD
428 24th St
Santa Monica, CA 90402

Dear Dr. Eric W. Fonkalsrud:

Thank you for your generous contribution. In order to submit your contribution for federal matching funds, the Federal Election Commission requires that we obtain additional information. Your contribution was drawn on an account with a designation indicating that it might contain funds other than your personal funds. We must verify that your contribution represents only your personal funds. It would be helpful if you would read the statement below and if it is accurate, please sign and return it to the Committee in the enclosed postage paid envelope at your earliest convenience.

Again, thank you for your support.

Sincerely,

Nancy A. Roda

Dole for President
Committee

I made a contribution of $100.00, deposited February 24, 1988, and drawn on check #8507 of the account identified as Eric W. Fonkalsrud Md. This is to verify that the contribution described above is drawn on an account containing only my personal funds. The account is not funded for my use on an unreimbursed basis by an incorporated entity.

Name Eric W. Fonkalsrud

Home Address 428 24th St.

City Santa Monica,

State Calif. zip 90402

Your signature Eric W Fonkalsrud
(please do not print)

ID: U90402 FNKL 428 E M 1 Bseq: 011712-0004 Ltr: 12

Paid for by Dole for President Committee

23040955655

60

SEP 24 1987

BOB DOLE President

September 11, 1987

Mr. Geo J. Schaefer, Sr.
1420 S 3rd St
Beatrice, NE 68310

Dear Mr. Geo J. Schaefer:

Thank you for your recent contribution. However, Federal law requires that we obtain additional information before we can accept or submit for matching funds a contribution drawn on an account maintained by a business entity. If the statement below is accurate, will you please sign and return it to us at your earliest convenience?

Thank you for your help.

Sincerely,

Renee J. Smith

Dole for President
Exploratory Committee

I made a contribution of $30.00, deposited August 21, 1987, and drawn on check #_____ of the account identified as F. D. Kees Manufacturing Co. This is to verify that this business account is not incorporated. The contribution represents my personal funds as I am a member of the unincorporated business. The full amount listed above should be attributed to me as it does not represent contributions from more than one person.

Name George J. Schaefer, Sr.

Address 1420 South 3rd Street

City Beatrice,

State Nebraska Zip 68310

Your signature _____
(please do not print)

ID: U68310 SCHF 420 G S 1 Bseq: 003945-0002 Ltr: 10

10/6 17.5.

1828 L Street, N.W., Suite 805, Washington, D.C. 20036
(202) 223-9400
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93040955656

62

DOLE
PRESIDENT

1828 L Street, N.W. • Suite 805
Washington, D.C. 20036
(202) 223-9400
(TDD) (202) 223-9400

WARREN

January 28, 1988

Mr. ~~Wike~~ K. Rodgers
RR 4 Box 224
Mt Pleasant, IA 52641

Dear Mr. Wike K. Rodgers:

Thank you for your generous contribution. In order to submit your contribution for federal matching funds, the Federal Election Commission requires that we obtain additional information. Your contribution was drawn on an account with a designation indicating that it might contain funds other than your personal funds. We must verify that your contribution represents only your personal funds. It would be helpful if you would read the statement below and if it is accurate, please sign and return it to the Committee in the enclosed postage paid envelope at your earliest convenience.

Again, thank you for your support.

Sincerely,

Nancy A. Roda
Dole for President
Committee

230409555657

I made a contribution of $25.00, deposited January 13, 1988, and drawn on check #1827 of the account identified as Fair Lane Farms. This is to verify that the contribution described above is drawn on an account containing only my personal funds. The account is not funded for my use on an unreimbursed basis by an incorporated entity.

Name W. K ROGERS
Home Address RFD 4
City MT PLEASANT
State IOWA Zip 52641
Your signature W. K. Rogers.
(please do not print)

Rec'd 2-19

ID: U52641 RDGR 004 W 1 Bseq: 010157-0001 Ltr: 12

Paid for by Dole for President Committee

63

I made a c. .cribution of $50.00, depos .ed November 3, 1987, and drawn on check #19751 of the account identified as Forms Management. This is to verify that this business account is not incorporated. The contribution represents my personal funds as I am a member of the unincorporated business. The full amount listed above should be attributed to me as it does not represent contributions from more than one person.

Name John H. Osborne

Address 1330 1st

City Wichita

State KS Zip 67214

Your signature John H. Osborne
(please do not print)

ID: U67214 OSBR 330 J 1 Bseq: 007044-0005 Ltr: 10

DEC 11 1987

Paid for by Dole for President Committee

23040955658

RECEIVED
SEP 21 1987

BOB DOLE President

August 31, 1987

Givens Construction
PO Box 19576
Los Angeles, CA 90019

Dear Sirs:

Thank you for your recent contribution. However, Federal law requires that we obtain additional information before we can accept or submit for matching funds a contribution drawn on an account maintained by a business entity. If the statement below is accurate, will you please sign and return it to us at your earliest convenience?

Thank you for your help.

Sincerely,

Renee J. Smith

Dole for President
Exploratory Committee

I made a contribution of $100.00, deposited July 23, 1987, and drawn on check #5631 of the account identified as Givens Construction. This is to verify that this business account is not incorporated. The contribution represents my personal funds as I am a member of the unincorporated business. The full amount listed above should be attributed to me as it does not represent contributions from more than one person.

Name Eric Givens

Address 1508 S Victoria Ave

City Los Angeles

State California Zip 90019

Your signature _____
(please do not print)

ID: U90019 GVNS 576 4 Bseq: 002683-0002 Ltr: 10

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23040955659

DOLE
PRESIDENT

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Washington, D.C. 20036
(202) 223-9400
(TDD) (202) 223-9400

April 12, 1988

Mr. Rodney Grodahl
Box 136
Lytton, IA 50561

Dear Mr. Rodney Grodahl:

Thank you for your generous contribution. In order to submit your contribution for federal matching funds, the Federal Election Commission requires that we obtain additional information. Your contribution was drawn on an account with a designation indicating that it might contain funds other than your personal funds. We must verify that your contribution represents only your personal funds. It would be helpful if you would read the statement below and if it is accurate, please sign and return it to the Committee in the enclosed postage paid envelope at your earliest convenience.

Again, thank you for your support.

Sincerely,

Dole for President
Committee

RECEIVED
APR 25 1988

I made a contribution of $1,000.00, deposited March 28, 1988, and drawn on check #632 of the account identified as Grodahl Farms. This is to verify that the contribution described above is drawn on an account containing only my personal funds. The account is not funded for my use on an unreimbursed basis by an incorporated entity.

Name Rodney Grodahl

Home Address Box 136

City Lytton

State Iowa Zip 50561

Your signature Rodney Grodahl
(please do not print)

ID: U50561 GRDH 136 R 1 Bseq: 012739-0002 Ltr: 12

Paid for by Dole for President Committee

23040955660

78

DOLE
PRESIDENT

1828 L Street, N.W. • Suite 805
Washington, D.C. 20036
(202) 223-9400
(TDD) (202) 223-9400

March 16, 1988

Mr. Rick Newman
PO Box 6817
Lawrence, NJ 08648

Dear Mr. Rick Newman:

Thank you for your generous contribution. In order to submit your contribution for federal matching funds, the Federal Election Commission requires that we obtain additional information. Your contribution was drawn on an account maintained by a business entity. We must verify that your contribution represents your personal funds. It would be helpful if you would read the statement below and if it is accurate, please sign and return it to the Committee in the enclosed postage paid envelope at your earliest convenience.

Again, thank you for your support.

Sincerely,

Nancy A. Roda
Dole for President
Committee

I made a contribution of $1,000.00, deposited February 29, 1988, and drawn on check #3161 of the account identified as Guardian Title Agency. This is to verify that this business account is not incorporated. The contribution represents my personal funds. The full amount listed above should be attributed to me as it does not represent contributions from more than one person.

Name Richard K Newman

Home Address 49 Columbia Ave.

City Hopewell

State N.J. Zip 08525

Your signature R K Newman
(please do not print)

ID: U08648 NWMN 817 R 1 Bseq: 011883-0009 Ltr: 10

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93040955661

B1

DOLE
PRESIDENT

1828 L Street, N.W. • Suite 805
Washington, D.C. 20036
(202) 223-9400
(TDD) (202) 223-9400

November 24, 1987

Miss Betty Blair
Lazy B Ranch
Atlanta, KS 67008

Dear Miss Betty Blair:

Thank you for your recent contribution. However, Federal law requires that we obtain additional information before we can accept or submit for matching funds a contribution drawn on an account maintained by a business entity. If the statement below is accurate, will you please sign and return it to us at your earliest convenience?

Thank you for your help.

Sincerely,

Nancy A. Roda

Dole for President
Exploratory Committee

I made a contribution of $50.00, deposited October 29, 1987, and drawn on check #6678 of the account identified as H. H. Blair Oil Company. This is to verify that this business account is not incorporated. The contribution represents my personal funds as I am a member of the unincorporated business. The full amount listed above should be attributed to me as it does not represent contributions from more than one person.

Name Betty Blair

Address R.R.1, Box 138

City Atlanta

State KS Zip 67008

Your signature Betty Blair by Mavra Blair
(please do not print)

ID: U67008 BLIR 000 B 2 Bseq: 006835-0010 Ltr: 10

DEC 11 1987

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93040955662

DOLE
PRESIDENT

1828 L Street, N.W. • Suite 805
Washington, D.C. 20036
(202) 223-9400
(TDD) (202) 223-9400

November 13, 1987

Dr. Harry E. Webb
12769 Overbrook Rd
Shawnee Mission, KS 66209

Dear Dr. Harry E. Webb:

Thank you for your recent contribution. However, Federal law requires that we obtain additional information before we can accept or submit for matching funds a contribution drawn on an account maintained by a business entity. If the statement below is accurate, will you please sign and return it to us at your earliest convenience?

Thank you for your help.

Sincerely,

Nancy Roda
Dole for President
Exploratory Committee

I made a contribution of $500.00, deposited October 26, 1987, and drawn on check #8035 of the account identified as Harry E. Webb Md. This is to verify that this business account is not incorporated. The contribution represents my personal funds as I am a member of the unincorporated business. The full amount listed above should be attributed to me as it does not represent contributions from more than one person. Also previous check for $2.

Name Harry E. Webb
Address 12769 Overbrook Rd
City Shawnee Mission
State Kansas Zip 66209
Your signature Harry E. Webb
(please do not print)

NOV 27

ID: U66209 WEBB 769 H 1 Bseq: 006641-0031 Ltr: 10

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23040955663

87

DOLE
PRESIDENT

1828 L Street, N.W. • Suite 805
Washington, D.C. 20036
(202) 223-9400
(TDD) (202) 223-9400

MAR 1 0 1988

March 8, 1988

Mr. James R. Herreid
11 Riverside Commans
Northfield, MN 55057

Dear Mr. James R. Herreid:

Thank you for your generous contribution. In order to submit your contribution for federal matching funds, the Federal Election Commission requires that we obtain additional information. Your contribution was drawn on an account maintained by a business entity. We must verify that your contribution represents your personal funds. It would be helpful if you would read the statement below and if it is accurate, please sign and return it to the Committee in the enclosed postage paid envelope at your earliest convenience.

Again, thank you for your support.

Sincerely,

Nancy A. Roda

Dole for President
Committee

I made a contribution of $10.00, deposited February 24, 1988, and drawn on check #8079 of the account identified as Herreid Agency. This is to verify that this business account is not incorporated. The contribution represents my personal funds. The full amount listed above should be attributed to me as it does not represent contributions from more than one person.

Name James R. Herreid

Home Address 11 Bridge Sq. Apt #1

City Northfield,

State Mn. Zip 55057

Your signature _____
(please do not print)

ID: U55057 HRRD 011 J 1 Bseq: 011668-0015 Ltr: 10

Paid for by Dole for President Committee.

930409556664

92

** PLEASE SIGN & RETURN TODAY

DOLE
PRESIDENT

1828 L Street, N.W. • Suite 805
Washington, D.C. 20036
(202) 223-9400
(TDD) (202) 223-9400

April 21, 1988

Mr. James J. Hansbauer
1016 Marcie Lane
Milford, OH 45150

Dear Mr. James J. Hansbauer:

Thank you for your contribution to Senator Dole's Presidential campaign.

Now that Senator Dole has withdrawn from the race, it is of the highest priority that the Dole for President Committee use every available resource to meet its financial obligations, enabling Senator Dole to concentrate on projecting his message of Party unity toward Republican victories in November.

If the statement below accurately reflects your contribution, please fill in your correct home address, sign the form and return it with the enclosed envelope. This will allow us to maximize your contribution through Federal Matching Funds. If you have previously received similar correspondence from the campaign, it is very important that each letter be signed and returned to the Committee without delay.

Thank you for your past support and assistance in helping us maximize your contribution to Senator Dole's campaign.

RECEIVED
APR 28 1988

Sincerely,

4/28

Mr. James L. Hagen
Dole for President Committee, Inc.

I made a contribution of $29.00, deposited February 22, 1988, and drawn on check #1206 of the account identified as J. & J. Investments. This is to verify that this business account is not incorporated. The contribution represents my personal funds. The full amount listed above should be attributed to me as it does not represent contributions from more than one person.

Name James J Hansbauer

Home Address 1016 Marcie Lane

City Milford State Ohio Zip 45150

Contributor's signature James J Hansbauer

ID: U45150 HNSB 016 J Bseq: 011501-0003 Ltr: 10

Paid for by Dole for President Committee

23040955665

BOB DOLE President

June 3, 1987

Dr. James A. Holliday
4700 N Habana Ave
Tampa, FL 33614

Dear Dr. James A. Holliday:

Thank you for your recent contribution. However, Federal law requires that we obtain additional information before we can submit the contribution and maximize our matching funds. If the following statement is accurate, will you please sign and return it to the Committee at your earliest convenience?

Thank you for your help.

Sincerely,
James L. Hagen
Comptroller
Dole for President
Exploratory Committee

I made a contribution of $50.00, deposited May 11, 1987, and drawn on check #1336 of the account identified as Dr James A. Holliday. This is to verify that I have equitable ownership in the contribution described above and that it represents my personal funds.

Name James A Holliday Jr MD

Home Address 4700 N HABANA

City TAMPA

State FLA Zip 33614

Your signature _____
(please do not print)

ID: U33614 HLLD 700 J 1 Bseq: 000422-0005 Ltr: 04

1828 L Street, N.W., Suite 805, Washington, D.C. 20036
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93040955666

DOLE
PRESIDENT

1828 L Street, N.W. • Suite 805
Washington, D.C. 20036
(202) 223-9400
(TDD) (202) 223-9400

December 17, 1987

Dr. James Martin Balliro
120 Boardwalk
Tallahassee, FL 32301

Dear Dr. James Martin Balliro:

Thank you for your recent contribution. However, Federal law requires that we obtain additional information before we can accept or submit for matching funds a contribution drawn on certain types of personal accounts which bear a designation indicating the possibility that the account may contain funds other than your personal funds. If the statement below is accurate, will you please sign and return it to us at your earliest convenience?

Thank you for your help.

Sincerely,

Nancy A. Hooks

Dole for President
Exploratory Committee

I made a contribution of $48.00, deposited November 19, 1987, and drawn on check #1228 of the account identified as James M. Balliro, Md Pa. This is to verify that the contribution described above is drawn on an account that contains only my personal funds. The account is not funded for my use on an unreimbursed basis by an incorporated entity.

Name James M Balliro MD

Address 1892 Buford Blvd.

City Tallahassee

State FL Zip 32308

Your signature J M Balliro MD
(please do not print)

JAN 04 1988

ID: U32301 BLLR 120 J 1 Bseq: 007906-0001 Ltr: 12

Paid for by Dole for President Committee

23U40955667

4

117

DOLE
PRESIDENT

1828 L Street, N.W. • Suite 805
Washington, D.C. 20036
(202) 223-9400
(TDD) (202) 223-9400

April 12, 1988

Mrs. Jessie M. Reed
Box 557
Meridian, TX 76665

Dear Mrs. Jessie M. Reed:

Thank you for your generous contribution. In order to submit your contribution for federal matching funds, the Federal Election Commission requires that we obtain additional information. Your contribution was drawn on an account maintained by a business entity. We must verify that your contribution represents your personal funds. It would be helpful if you would read the statement below and if it is accurate, please sign and return it to the Committee in the enclosed postage paid envelope at your earliest convenience.

Again, thank you for your support.

Sincerely,

Nancy A. Rost

Dole for President
Committee

I made a contribution of $40.00, deposited March 29, 1988, and drawn on check #6704 of the account identified as L. P. Reed Ranch. This is to verify that this business account is not incorporated. The contribution represents my personal funds. The full amount listed above should be attributed to me as it does not represent contributions from more than one person.

Name Mrs L. P. Reed (Jessie M. Reed)

Home Address P.O. Box 557

City Meridian

State Texas Zip 76665

Your signature Jessie M. Reed
(please do not print)

RECEIVED
APR 26 1988

ACF 4-28

ID: U76665 REED 557 J 2 Bseq: 012775-0024 Ltr: 10

Paid for by Dole for President Committee

23004095568

DOLE
PRESIDENT

1828 L Street, N.W. • Suite 805
Washington, D.C. 20036
(202) 223-9400
(TDD) (202) 223-9400

March 8, 1988

Mr. Alfredo Curi
3907 NW 7th St
Miami, FL 33126

Dear Mr. Alfredo Curi:

Thank you for your generous contribution. In order to submit your contribution for federal matching funds, the Federal Election Commission requires that we obtain additional information. Your contribution was drawn on an account maintained by a business entity. We must verify that your contribution represents your personal funds. It would be helpful if you would read the statement below and if it is accurate, please sign and return it to the Committee in the enclosed postage paid envelope at your earliest convenience.

Again, thank you for your support.

Sincerely,

Nancy A. Roda

Dole for President
Committee

I made a contribution of $29.00, deposited February 26, 1988, and drawn on check #2124 of the account identified as Le Trianon Jewelry. This is to verify that this business account is not incorporated. The contribution represents my personal funds. The full amount listed above should be attributed to me as it does not represent contributions from more than one person.

Name ALFREDO CURI

Home Address 3807 NW 7TH STREET

City MIAMI

State FLORIDA Zip 33126

Your signature Alfredo Curi
(please do not print)

3/8/88

ID: U33126 CURI 907 A 1 Bseq: 011853-0005 Ltr: 10

MAR 16 1988

Paid for by Dole for President Committee.

23040955669

124

DOLE
PRESIDENT

RECEIVED
DEC 28 1987
LOS ANGELES DRYWALL
LIQ. NO. 6187-81

1828 L Street, N.W. • Suite 805
Washington, D.C. 20036
(202) 223-9400
(TDD) (202) 223-9400

December 17, 1987

Mr. Jim Bald
3940 Gilman Street
Long Beach, CA 90815

Dear Mr. Jim Bald:

Thank you for your recent contribution. However, Federal law requires that we obtain additional information before we can accept or submit for matching funds a contribution drawn on an account maintained by a business entity. If the statement below is accurate, will you please sign and return it to us at your earliest convenience?

Thank you for your help.

Sincerely,

Nancy A. Rode
Dole for President
Exploratory Committee

I made a contribution of $1,000.00, deposited November 4, 1987, and drawn on check #46212 of the account identified as Los Angeles Drywall. This is to verify that this business account is not incorporated. The contribution represents my personal funds as I am a member of the unincorporated business. The full amount listed above should be attributed to me as it does not represent contributions from more than one person.

Name JAMES BALD

Address #4 LAZY CREEK LANE

City Rolling Hills Estates

State Calif. Zip 90274

Your signature _____
(please do not print)

JAN 04 1988

ID: U90815 BALD 940 J 1 Bseq: 007196-0003 Ltr: 10

Paid for by Dole for President Committee

23040955670

13C

DOLE
PRESIDENT

1828 L Street, N.W. • Suite 805
Washington, D.C. 20036
(202) 223-9400
(TDD) (202) 223-9400

March 15, 1988

Mr. Martin W. Taplin
1404 Rise Aya Dr
Surfsine, FL 33014

Dear Mr. Martin W. Taplin:

Thank you for your generous contribution. In order to submit your contribution for federal matching funds, the Federal Election Commission requires that we obtain additional information. Your contribution was drawn on an account with a designation indicating that it might contain funds other than your personal funds. We must verify that your contribution represents only your personal funds. It would be helpful if you would read the statement below and if it is accurate, please sign and return it to the Committee in the enclosed postage paid envelope at your earliest convenience.

Again, thank you for your support.

Sincerely,

Nancy A Reda

Dole for President
Committee

I made a contribution of $1,000.00, deposited January 6, 1988, and drawn on check #15312 of the account identified as Attorney At Law. This is to verify that the contribution described above is drawn on an account containing only my personal funds. The account is not funded for my use on an unreimbursed basis by an incorporated entity.

3/30

Name Martin W. Taplin

Home Address 1404 Biscayne Dr

City Surfsine

State Fla ~~zip~~ 33154

Your signature [signature]
(please do not print)

MAR 28 1988

ID: U33014 TPLN 404 M 1 Bseg: 009879-0015 Ltr: 12

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23004095567 1

DOLE
PRESIDENT

1828 L Street, N.W. • Suite 805
Washington, D.C. 20036
(202) 223-9400
(TDD) (202) 223-9400

January 15, 1988

Mr. McVean
850 Ridge Lake Blvd Suite G-01
Memphis, TN 38119

Dear Mr. McVean:

Thank you for your generous contribution. In order to submit your contribution for federal matching funds, the Federal Election Commission requires that we obtain additional information. Your contribution was drawn on an account maintained by a business entity. We must verify that your contribution represents your personal funds. It would be helpful if you would read the statement below and if it is accurate, please sign and return it to the Committee in the enclosed postage paid envelope at your earliest convenience.

Again, thank you for your support.

Sincerely,

Nancy O. Dole

Dole for President
Committee

PB
1/25

23040955672

I made a contribution of $1,000.00, deposited September 25, 1987, and drawn on check #2438 of the account identified as Mcvean and Company. This is to verify that this business account is not incorporated. The contribution represents my personal funds. The full amount listed above should be attributed to me as it does not represent contributions from more than one person.

Name Charles D McVean

Home Address 50 Goodway LN

City Memphis

State TN Zip 38117

JAN 23 1988

Your signature X C D McVean
(please do not print)

ID: U38119 MCVN 850 1 Bseq: 005138-0002 Ltr: 10

Paid for by Dole for President Committee

1,150-

2nd Qtr 1987

(140)

BOB DOLE President

June 3, 1987

Modern Development Co
7803 E Somerset Blvd
Paramount, CA 90723

Dear Sirs:

Thank you for your recent contribution. However, Federal law requires that we obtain additional information before we can submit for matching funds a contribution drawn on an account maintained by partnerships, groups, associations or other types of non-personal accounts. If the statement below is accurate, will you please sign and return it and the additional pages to the Committee at your earliest convenience?

Thank you for your help.

Sincerely,

James L. Hagen
Controller

Dole for President
Exploratory Committee

A contribution of $250.00, deposited April 28, 1987, and drawn on check #24256 of the account identified as Modern Development Co is maintained by:

✓ A partnership, which is non-incorporated.

_____ A professional association or professional corporation that is not treated as a corporation under applicable laws of the state of_____.

_____ Other group or association (describe).

_____

_____

ID: U90723 MDRN 803 4 Bseq: 000213-0001 Ltr: 11

1828 L Street, N.W., Suite 805, Washington, D.C. 20036
(202) 223-9400
Paid for by Dole for President Exploratory Committee

The contribution described above represents my personal funds as I am a partner in the partnership (or a member of the association). The full amount as listed above should be attributed to me as it does not represent contributions from more than one person. Or if the check represents contributions from more than one partner, all are listed below.

There are over 60 partners Contributions are listed on each
Name K-1 according to their % interest.
Address _____
City _____
State _____ Zip _____
Amount _____
Your signature _____
(please do not print)

Name _____
Address _____
City _____
State _____ Zip _____
Amount _____
Your signature _____
(please do not print)

Name _____
Address _____
City _____
State _____ Zip _____
Amount _____
Your signature _____
(please do not print)

23040955674

150

DOLE
PRESIDENT

1828 L Street, N.W. • Suite 805
Washington, D.C. 20036
(202) 223-9400
(TDD) (202) 223-9400

March 4, 1988

Dr. Nazir U. Khaja
3655 Lomita Blvd #421
Torrance, CA 90505

Dear Dr. Nazir U. Khaja:

Thank you for your generous contribution. In order to submit your contribution for federal matching funds, the Federal Election Commission requires that we obtain additional information. We must verify that your contribution represents your personal funds. It would be helpful if you would read the statement below and if it is accurate, please sign and return it to the Committee in the enclosed postage paid envelope at your earliest convenience.

Again, thank you for your support.

Sincerely,

Nancy L. Dole

3/22

Dole for President
Committee

I made a contribution of $100.00, deposited February 19, 1988, and drawn on check #1076 of the account identified as Naziur U. Khaja, Md. This is to verify that I have equitable ownership in the contribution described above and that it represents my personal funds.

Name NAZIR KHAJA, MD

Home Address 3655 LOMITA BLVD #421

City TORRANCE

State CA Zip 90505

Your signature N. Khaja
(please do not print)

ID: U90505 KHJA 655 N 1 Bseq: 011403-0026 Ltr: 04

MAR 21 1988

Paid for by Dole for President Committee

23040955675

151

DOLE
PRESIDENT

1828 L Street, N.W. • Suite 805
Washington, D.C. 20036
(202) 223-9400
(TDD) (202) 223-9400

January 28, 1988

Mr. Wayne Nelson
904 7th
Harlan, IA 51537

Dear Mr. Wayne Nelson:

Thank you for your generous contribution. In order to submit your contribution for federal matching funds, the Federal Election Commission requires that we obtain additional information. Your contribution was drawn on an account maintained by a business entity. We must verify that your contribution represents your personal funds. It would be helpful if you would read the statement below and if it is accurate, please sign and return it to the Committee in the enclosed postage paid envelope at your earliest convenience.

Again, thank you for your support.

BC
2/9

Sincerely,

Nancy A. Reda
Dole for President
Committee

I made a contribution of $15.00, deposited January 12, 1988, and drawn on check #3821 of the account identified as Nelson Motor Parts. This is to verify that this business account is not incorporated. The contribution represents my personal funds. The full amount listed above should be attributed to me as it does not represent contributions from more than one person.

Name Wayne Nelson

Home Address 405 12th

City Harlan

State Ia Zip 51537

Your signature Wayne Nelson
(please do not print)

FEB 08 1988

ID: U51537 NLSN 904 W 1 Bseq: 010052-0001 Ltr: 10

Paid for by Dole for President Committee

23040955676

152

BOB DOLE President

October 21, 1987

Nelson Motor Parts
904 7th
Harlan, IA 51537

Dear Sirs:

Thank you for your recent contribution. However, Federal law requires that we obtain additional information before we can accept or submit for matching funds a contribution drawn on an account maintained by a business entity. If the statement below is accurate, will you please sign and return it to us at your earliest convenience?

Thank you for your help.

OCT 30 1987

Sincerely,

Dole for President
Exploratory Committee

I made a contribution of $19.88, deposited October 1, 1987, and drawn on check #3436 of the account identified as Nelson Motor Parts. This is to verify that this business account is not incorporated. The contribution represents my personal funds as I am a member of the unincorporated business. The full amount listed above should be attributed to me as it does not represent contributions from more than one person.

I am Incorporate however I am the only Stockh or officer

Name Wayne Nelson

Address 904 7th

City Harlan

State Ia Zip 51537

Your signature Wayne Nelson
(please do not print)

ID: U51537 NLSN 904 4 Bseq: 005414-0003 Ltr: 10

1828 L Street, N.W., Suite 805, Washington, D.C. 20036
(202) 223-9400
Paid for by Dole for President Exploratory Committee

23040955677

RECEIVED
SEP 15 1987

156

BOB DOLE
President

August 31, 1987

Dr. Norman F. Sprague, Jr.
550 S Mapleton Drive
Los Angeles, CA 90024

Dear Dr. Norman F. Sprague:

Thank you for your recent contribution. However, Federal law requires that we obtain additional information before we can accept or submit for matching funds a contribution drawn on an account maintained by a business entity. If the statement below is accurate, will you please sign and return it to us at your earliest convenience?

Thank you for your help.

Sincerely,

Renee J. Smith

Dole for President
Exploratory Committee

I made a contribution of $1,000.00, deposited July 9, 1987, and drawn on check #5517 of the account identified as Norman F. Sprague Jr Md. This is to verify that this business account is not incorporated. The contribution represents my personal funds as I am a member of the unincorporated business. The full amount listed above should be attributed to me as it does not represent contributions from more than one person.

Name NORMAN F. SPRAGUE JR M.D.

Address 550 So MAPLETON DR

City LOS ANGELES,

State CALIF. zip 90024

Your signature Norman F. Sprague Jr
(please do not print)

9/25

D.T.

ID: U90040955678 SPRG 550 N J 1 Bseq: 002223-0027 Ltr: 10

1828 L Street, N.W., Suite 805, Washington, D.C. 20036
(202) 223-9400
Paid for by Dole for President Exploratory Committee

156

DOLE
PRESIDENT

1828 L Street, N.W. • Suite 805
Washington, D.C. 20036
(202) 223-9400
(TDD) (202) 223-9400

February 18, 1988

Mr. Acphonse Stroobants
Rt 1 Box 511
Forest, VA 24551

Dear Mr. Acphonse Stroobants:

Thank you for your generous contribution. In order to submit your contribution for federal matching funds, the Federal Election Commission requires that we obtain additional information. Your contribution was drawn on an account with a designation indicating that it might contain funds other than your personal funds. We must verify that your contribution represents only your personal funds. It would be helpful if you would read the statement below and if it is accurate, please sign and return it to the Committee in the enclosed postage paid envelope at your earliest convenience.

Again, thank you for your support.

Sincerely,

Dole for President
Committee

I made a contribution of $1,000.00, deposited February 3, 1988, and drawn on check #12019 of the account identified as North Cote Farm. This is to verify that the contribution described above is drawn on an account containing only my personal funds. The account is not funded for my use on an unreimbursed basis by an incorporated entity.

Name ALPHONSE STROOBANTS

Home Address RT. 1 BOX 511

City FOREST

State VA Zip 24551

Your signature Alphonse Stroobants
(please do not print)

ID: U24551 STRB 001 A 1 Bseq: 010861-0003 Ltr: 12

Paid for by Dole for President Committee.

23040955679

162

** PLEASE SIGN & RETURN TODAY

DOLE
PRESIDENT

1828 L Street, N.W. • Suite 805
Washington, D.C. 20036
(202) 223-9400
(TDD) (202) 223-9400

April 21, 1988

Mr. Leo Palmer
2735 Iris Ave #A
Boulder, CO 80302

Dear Mr. Leo Palmer:

Thank you for your contribution to Senator Dole's Presidential campaign.

Now that Senator Dole has withdrawn from the race, it is of the highest priority that the Dole for President Committee use every available resource to meet its financial obligations, enabling Senator Dole to concentrate on projecting his message of Party unity toward Republican victories in November.

If the statement below accurately reflects your contribution, please fill in your correct home address, sign the form and return it with the enclosed envelope. This will allow us to maximize your contribution through Federal Matching Funds. If you have previously received similar correspondence from the campaign, it is very important that each letter be signed and returned to the Committee without delay.

Thank you for your past support and assistance in helping us maximize your contribution to Senator Dole's campaign.

RECEIVED
APR 28 1988

Sincerely,

PD 4/28

Mr. James L. Hagen
Dole for President Committee, Inc.

I made a contribution of $1,000.00, deposited February 2, 1988, and drawn on check #06589 of the account identified as Palmer Development Co.. This is to verify that this business account is not incorporated. The contribution represents my personal funds. The full amount listed above should be attributed to me as it does not represent contributions from more than one person.

Name LEO PALMER

Home Address 7 ACORN LANE

City BOULDER State CO Zip 80302

Contributor's signature

ID: U80302 PLMR 735 L 1 Dseq: 010914-0003 Ltr: 10

Paid for by Dole for President Committee

23040955680

163

DOLE
PRESIDENT

1828 L Street, N.W. • Suite 805
Washington, D.C. 20036
(202) 223-9400
(TDD) (202) 223-9400

January 13, 1988

Mr. Joseph Yurman
8019 Colonial Rd
Brooklyn, NY 11209

Dear Mr. Joseph Yurman:

Thank you for your generous contribution. In order to submit your contribution for federal matching funds, the Federal Election Commission requires that we obtain additional information. Your contribution was drawn on an account maintained by a business entity. We must verify that your contribution represents your personal funds. It would be helpful if you would read the statement below and if it is accurate, please sign and return it to the Committee in the enclosed postage paid envelope at your earliest convenience.

Again, thank you for your support.

Sincerely,

Nancy G. Rodd

Dole for President
Committee

I made a contribution of $1,000.00, deposited December 14, 1987, and drawn on check #1030 of the account identified as Palmeri Harvey Young & Co. This is to verify that this business account is not incorporated. The contribution represents my personal funds. The full amount listed above should be attributed to me as it does not represent contributions from more than one person.

Name Joseph Yurman

Home Address 8019 Colonial Rd

City Brooklyn

State New York Zip 11209

Your signature Joseph Yurman
(please do not print)

JAN-20 1988 TH ✓ 1/2

ID: U11209 YRMN 019 J 1 Bseq: 008886-0011 Ltr: 10

Paid for by Dole for President Committee

23040955681

DOLE
PRESIDENT

1828 L Street, N.W. • Suite 805
Washington, D.C. 20036
(202) 223-9400
(TDD) (202) 223-9400

February 18, 1988

Mrs. Pam Boddicker
RR 2 Box 124
Walker, IA 52352

Dear Mrs. Pam Boddicker:

Thank you for your generous contribution. In order to submit your contribution for federal matching funds, the Federal Election Commission requires that we obtain additional information. Your contribution was drawn on an account maintained by a business entity. We must verify that your contribution represents your personal funds. It would be helpful if you would read the statement below and if it is accurate, please sign and return it to the Committee in the enclosed postage paid envelope at your earliest convenience.

Again, thank you for your support.

Sincerely,

Nancy A. Dole

Dole for President
Committee

I made a contribution of $15.00, deposited November 5, 1987, and drawn on check #571 of the account identified as Piney Knoll Farms. This is to verify that this business account is not incorporated. The contribution represents my personal funds. The full amount listed above should be attributed to me as it does not represent contributions from more than one person.

Name Pam Boddicker

Home Address RR2 Box 124

City Walker

State Iowa zip 52352

Your signature Pam Boddicker FEB 29 1988
(please do not print)

2/24/88

ID: U52352 BDDC 002 P 2 Bseq: 007252-0005 Ltr: 10

Paid for by Dole for President Committee

23040955682

174

DOLE
PRESIDENT

1828 L Street, N.W. • Suite 805
Washington, D.C. 20036
(202) 223-9400
(TDD) (202) 223-9400

CABBAD, Albert

January 15, 1988

~~R. & A. Discount Stores~~
106 Fifth Avenue
Brooklyn, NY 11217

Dear Sirs:

Thank you for your generous contribution. In order to submit your contribution for federal matching funds, the Federal Election Commission requires that we obtain additional information. Your contribution was drawn on an account maintained by a business entity. We must verify that your contribution represents your personal funds. It would be helpful if you would read the statement below and if it is accurate, please sign and return it to the Committee in the enclosed postage paid envelope at your earliest convenience.

Again, thank you for your support.

Sincerely,

Nancy A. Rob

Dole for President
Committee

I made a contribution of $100.00, deposited October 6, 1987, and drawn on check #12723 of the account identified as R. & A. Discount Stores. This is to verify that this business account is not incorporated. The contribution represents my personal funds. The full amount listed above should be attributed to me as it does not represent contributions from more than one person.

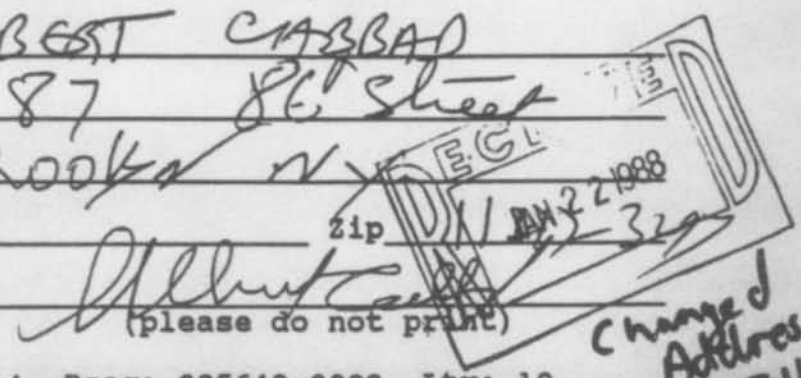
Name ALBERT CABBAD

Home Address 87 8C Street

City BROOKLYN

State N.Y. Zip 11209

Your signature Albert Cabbad
(please do not print)



Changed Address T.H.

ID: U11217 RDSC 106 4 Bseq: 005642-0002 Ltr: 10

Paid for by Dole for President Committee.

TH 1/26

23040955683

190

DOLE
PRESIDENT

1828 L Street, N.W. • Suite 805
Washington, D.C. 20036
(202) 223-9400
(TDD) (202) 223-9400

February 24, 1988

Mr. Robert L. Manard, III
221 Carondelet St Suite 400
New Orleans, LA 70130

Dear Mr. Robert L. Manard:

Thank you for your generous contribution. In order to submit your contribution for federal matching funds, the Federal Election Commission requires that we obtain additional information. Your contribution was drawn on an account with a designation indicating that it might contain funds other than your personal funds. We must verify that your contribution represents only your personal funds. It would be helpful if you would read the statement below and if it is accurate, please sign and return it to the Committee in the enclosed postage paid envelope at your earliest convenience.

Again, thank you for your support.

Sincerely,

Nancy A. Roda

Dole for President
Committee

I made a contribution of $1,000.00, deposited February 12, 1988, and drawn on check #1007 of the account identified as Attorney-At-Law. This is to verify that the contribution described above is drawn on an account containing only my personal funds. The account is not funded for my use on an unreimbursed basis by an incorporated entity.

Name ROBERT L. MANARD III

Home Address 23 WAVERLY PL

City METAIRIE

State LA Zip 70002

Your signature _____
(please do not print)

ID: U70130 MNRD 221 R I 1 Bseq: 011169-0003 Ltr: 12

Paid for by Dole for President Committee

23040955684

(191)

DOLE
PRESIDENT

1828 L Street, N.W. • Suite 805
Washington, D.C. 20036
(202) 223-9400
(TDD) (202) 223-9400

March 9, 1988

Robins Associate
12674 Buckland Street
West Palm Beach, FL 33414

Dear Sirs:

Thank you for your generous contribution. In order to submit your contribution for federal matching funds, the Federal Election Commission requires that we obtain additional information. Your contribution appears to have been drawn on an account maintained by a partnership, group, association or other type of non-personal account. We must verify that your contribution represents your personal funds. It would be helpful if you would read the statement below and if it is accurate, please sign and return it with the additional pages to the Committee in the enclosed postage paid envelope at your earliest convenience.

Again, thank you for your help.

Sincerely,

Nancy A Koda

Dole for President
Committee

A contribution of $29.00, deposited October 9, 1987, and drawn on check #255 of the account identified as Robins Associates Pa is maintained by:

_____ A partnership, which is non-incorporated.

_____ A professional association or professional corporation that is not treated as a corporation under applicable laws of the state of Florida.

_____ Other group or association (describe).

_____

_____

MAR 16 19

ID: U33414 RBNS 674 4 Bseq: 005881-0001 Ltr: 11

Paid for by Dole for President Committee

CONT →

23040955685

The contribution described above represents my personal funds as I am a partner in the partnership (or a member of the association). The full amount as listed above should be attributed to me as it does not represent contributions from more than one person. Or if the check represents contributions from more than one partner, all are listed below.

Name _____

Address _____

City _____

State _____ Zip _____

Amount _____

Your signature Ellis Rubin
(please do not print)

Name _____

Address _____

City _____

State _____ Zip _____

Amount _____

Your signature _____
(please do not print)

Name _____

2/23/90 _____

I phoned Fla. (Corp. Div.) Sec. of St and Rubins Associates, P.A., which was dissolved 10/13/89, was considered a Fla corporation prior to that date. MZF

_____ Zip _____

_____

_____
(please do not print)

MAR 16 1990

930409556886

102

DOLE
PRESIDENT

1828 L Street, N.W. • Suite 805
Washington, D.C. 20036
(202) 223-9400
(TDD) (202) 223-9400

December 17, 1987

Mr. Ronald Book, PA
20801 Biscayne Blvd Suite 401
North Miami Beach, FL 33180

Dear Mr. Ronald Book:

Thank you for your recent contribution. However, Federal law requires that we obtain additional information before we can accept or submit for matching funds a contribution drawn on certain types of personal accounts which bear a designation indicating the possibility that the account may contain funds other than your personal funds. If the statement below is accurate, will you please sign and return it to us at your earliest convenience?

Thank you for your help.

Sincerely,

Nancy A. Rode

Dole for President
Exploratory Committee

I made a contribution of $1,000.00, deposited November 17, 1987, and drawn on check #1338 of the account identified as Operating Account. This is to verify that the contribution described above is drawn on an account that contains only my personal funds. The account is not funded for my use on an unreimbursed basis by an incorporated entity.

Name Ronald Book

Address 20801 Bisc. Blvd. Suite 401

City North Miami Bch

State Fla Zip 33180

DEC 28 1987

Your signature Ronald Book
(please do not print)

ID: U33180 BOOK 801 R P 1 Bseq: 007728-0001 Ltr: 12

TH ✓
12/30

Paid for by Dole for President Committee

23040955687

195

** PLEASE SIGN & RETURN TODAY

DOLE
PRESIDENT

1828 L Street, N.W. • Suite 805
Washington, D.C. 20036
(202) 223-9400
(TDD) (202) 223-9400

April 21, 1988

Mr. Cecil D. Ruble
3063 Beechrun
Memphis, TN 38128

Dear Mr. Cecil D. Ruble:

Thank you for your contribution to Senator Dole's Presidential campaign.

Now that Senator Dole has withdrawn from the race, it is of the highest priority that the Dole for President Committee use every available resource to meet its financial obligations, enabling Senator Dole to concentrate on projecting his message of Party unity toward Republican victories in November.

If the statement below accurately reflects your contribution, please fill in your correct home address, sign the form and return it with the enclosed envelope. This will allow us to maximize your contribution through Federal Matching Funds. If you have previously received similar correspondence from the campaign, it is very important that each letter be signed and returned to the Committee without delay.

Thank you for your past support and assistance in helping us maximize your contribution to Senator Dole's campaign.

√QA 4/28

Sincerely,

Mr. James L. Hagen
Dole for President Committee, Inc.

I made a contribution of $29.00, deposited March 3, 1988, and drawn on check #0755 of the account identified as Ruble Construction Co. This is to verify that this business account is not incorporated. The contribution represents my personal funds. The full amount listed above should be attributed to me as it does not represent contributions from more than one person.

RECEIVED APR 28 1988

Name Cecil D Ruble

Home Address 3063 Beechrun

City Memphis State Tenn Zip 38128

Contributor's signature Cecil D Ruble

ID: U38128 RBLE 063 C 1 Bseq: 012087-0002 Ltr: 10

Paid for by Dole for President Committee

23040955688

BOB DOLE President

Mr. Cecil D. ~~Rubie~~ Ruble
3063 Beechrun
Memphis, TN 38128

October 21, 1987

Dear Mr. Cecil D. Rubie:

Thank you for your recent contribution. However, Federal law requires that we obtain additional information before we can accept or submit for matching funds a contribution drawn on an account maintained by a business entity. If the statement below is accurate, will you please sign and return it to us at your earliest convenience?

Thank you for your help.

Sincerely,

Updated RR 11/6

Dole for President
Exploratory Committee

I made a contribution of $50.00, deposited September 29, 1987, and drawn on check #0451 of the account identified as Ruble Construction Co. This is to verify that this business account is not incorporated. The contribution represents my personal funds as I am a member of the unincorporated business. The full amount listed above should be attributed to me as it does not represent contributions from more than one person.

Name Cecil D. Ruble
Address 3063 Beechrun
City Memphis Tenn
State Tenn zip 38128
Your signature Cecil D. Ruble
(please do not print)

ID: U38128 RBIE 063 C 1 Bseq: 005263-0009 Ltr: 10

NOV 2 1987

1828 L Street, N.W., Suite 805, Washington, D.C. 20036
(202) 223-9400
Paid for by Dole for President Exploratory Committee

23040955689

197

DOLE
PRESIDENT

1828 L Street, N.W. • Suite 805
Washington, D.C. 20036
(202) 223-9400
(TDD) (202) 223-9400

January 13, 1988

Mr. Willis J. Pape
Robinson, KS 66532

Dear Mr. Willis J. Pape:

Thank you for your generous contribution. In order to submit your contribution for federal matching funds, the Federal Election Commission requires that we obtain additional information. Your contribution was drawn on an account maintained by a business entity. We must verify that your contribution represents your personal funds. It would be helpful if you would read the statement below and if it is accurate, please sign and return it to the Committee in the enclosed postage paid envelope at your earliest convenience.

Again, thank you for your support.

Sincerely,

Nancy A. Rode

Dole for President
Committee

11/87

23U4095556690

I made a contribution of $25.00, deposited November 24, 1987, and drawn on check #1961 of the account identified as S. & J. Land & Cattle Co. This is to verify that this business account is not incorporated. The contribution represents my personal funds. The full amount listed above should be attributed to me as it does not represent contributions from more than one person.

JAN 25 1988

Name Willis J. Pape

Home Address Route 1

City Robinson

State Kansas Zip 66532

Your signature Willis J. Pape
(please do not print)

ID: U66532 PAPE 000 W 1 Bseq: 008157-0007 Ltr: 10

Paid for by Dole for President Committee

S & J Land & Cattle Co., Inc. is a closely held corporation owned by me, Willis J. Pope. My personal funds are withdrawn from this account.

Thank you.
W. J. Pope

23040955691

202

DOLE
PRESIDENT

1828 L Street, N.W. • Suite 805
Washington, D.C. 20036
(202) 223-9400
(TDD) (202) 223-9400

DEC 10 1987

November 24, 1987

Mr. Don Ostrander
3212 Green Hills Rd
Topeka, KS 66618

Dear Mr. Don Ostrander:

Thank you for your recent contribution. However, Federal law requires that we obtain additional information before we can accept or submit for matching funds a contribution drawn on certain types of personal accounts which bear a designation indicating the possibility that the account may contain funds other than your personal funds. If the statement below is accurate, will you please sign and return it to us at your earliest convenience?

Thank you for your help.

Sincerely,

Nancy A. Koda

Dole for President
Exploratory Committee

I made a contribution of $50.00, deposited November 3, 1987, and drawn on check #506 of the account identified as Dba Services Umlimited. This is to verify that the contribution described above is drawn on an account that contains only my personal funds. The account is not funded for my use on an unreimbursed basis by an incorporated entity.

Name DON G OSTRANDER

Address 3212 NW GREEN HLS Rd

City TOPEKA.

State KANSAS Zip 66618

Your signature Don G Ostrander
(please do not print)

ID: U66618 OSTR 212 D 1 Bseq: 007044-0006 Ltr: 12

Paid for by Dole for President Committee

93040955692

205

DOLE
PRESIDENT

1828 L Street, N.W. • Suite 805
Washington, D.C. 20036
(202) 223-9400
(TDD) (202) 223-9400

January 15, 1988

Mr. Lawrence J. Silvi
1903 Old Bristol Pike
Morrisville, PA 19067

Dear Mr. Lawrence J. Silvi:

Thank you for your generous contribution. In order to submit your contribution for federal matching funds, the Federal Election Commission requires that we obtain additional information. Your contribution was drawn on an account maintained by a business entity. We must verify that your contribution represents your personal funds. It would be helpful if you would read the statement below and if it is accurate, please sign and return it to the Committee in the enclosed postage paid envelope at your earliest convenience.

Again, thank you for your support.

Sincerely,

Nancy L. Rodda

Dole for President
Committee

PB
2/9

23040955693

I made a contribution of $1,000.00, deposited August 14, 1987, and drawn on check #1376 of the account identified as Silvi Concrete Products. This is to verify that this business account is not incorporated. The contribution represents my personal funds. The full amount listed above should be attributed to me as it does not represent contributions from more than one person.

Name Lawrence J. Silvi

Home Address 1903 Old Bristol Pike

City Morrisville, Penna.

State Penna. Zip 19067

Your signature Lawrence J. Silvi FEB 08 1988
(please do not print)

ID: U19067 SLVI 903 L 1 Bseq: 003636-0001 Ltr: 10

Paid for by Dole for President Committee

DOLE
PRESIDENT

1828 L Street, N.W. • Suite 805
Washington, D.C. 20036
(202) 223-9400
(TDD) (202) 223-9400

Dr. Stephen E. Genender
West Tower
8635 West 3rd St Suite 1090
Los Angeles, CA 90048

February 18, 1988

Dear Dr. Stephen E. Genender:

Thank you for your generous contribution. In order to submit your contribution for federal matching funds, the Federal Election Commission requires that we obtain additional information. Your contribution was drawn on an account with a designation indicating that it might contain funds other than your personal funds. We must verify that your contribution represents only your personal funds. It would be helpful if you would read the statement below and if it is accurate, please sign and return it to the Committee in the enclosed postage paid envelope at your earliest convenience.

Again, thank you for your support.

Sincerely,

Nancy A Roda

Dole for President
Committee

I made a contribution of $1,000.00, deposited December 18, 1987, and drawn on check #780 of the account identified as Stephen E. Genender Md. This is to verify that the contribution described above is drawn on an account containing only my personal funds. The account is not funded for my use on an unreimbursed basis by an incorporated entity.

Name Stephen E. Genender.

Home Address 135 Fremont Place

City Los Angeles

State CA Zip 90005

Your signature _____
(please do not print)

ID: U90048 GNND 635 S 1 Bseq: 009160-0004 Ltr: 12

Paid for by Dole for President Committee.

FEB 29 1988

23040955694

210

** PLEASE SIGN & RETURN TODAY

DOLE
PRESIDENT

1828 L Street, N.W. • Suite 805
Washington, D.C. 20036
(202) 223-9400
(TDD) (202) 223-9400

April 21, 1988

Jason Mieras
Ms. ~~Joy Glassey~~
PO Drawer 908
Crestline, CA 92325

Dear Ms. Joy Glassey:

Thank you for your contribution to Senator Dole's Presidential campaign.

Now that Senator Dole has withdrawn from the race, it is of the highest priority that the Dole for President Committee use every available resource to meet its financial obligations, enabling Senator Dole to concentrate on projecting his message of Party unity toward Republican victories in November.

If the statement below accurately reflects your contribution, please fill in your correct home address, sign the form and return it with the enclosed envelope. This will allow us to maximize your contribution through Federal Matching Funds. If you have previously received similar correspondence from the campaign, it is very important that each letter be signed and returned to the Committee without delay.

Thank you for your past support and assistance in helping us maximize your contribution to Senator Dole's campaign.

Sincerely,

Mr. James L. Hagen
Dole for President Committee, Inc.

RECEIVED
APR 29 1988

I made a contribution of $50.00, deposited January 28, 1988, and drawn on check #6920 of the account identified as Suburban Electric. This is to verify that this business account is not incorporated. The contribution represents my personal funds. The full amount listed above should be attributed to me as it does not represent contributions from more than one person.

Name Jason E. Mieras (not Joy Glassey)

Home Address P.O. Box 908

City Crestline State CA Zip 92325

Contributor's signature Jason E. Mieras

ID: U92325 GLSS 908 J 2 Bseq: 010709-0001 Ltr: 10

Paid for by Dole for President Committee

23040955695

211

DOLE
PRESIDENT

1828 L Street, N.W. • Suite 805
Washington, D.C. 20036
(202) 223-9400
(TDD) (202) 223-9400

November 24, 1987

Mr. Dick B. Delano
104 S Broadway #1400
Wichita, KS 67202

Dear Mr. Dick B. Delano:

Thank you for your recent contribution. However, Federal law requires that we obtain additional information before we can accept or submit for matching funds a contribution drawn on an account maintained by a business entity. If the statement below is accurate, will you please sign and return it to us at your earliest convenience?

Thank you for your help.

Sincerely,

Nancy A. Roda

Dole for President
Exploratory Committee

I made a contribution of $50.00, deposited November 3, 1987, and drawn on check #53132 of the account identified as Sunrise Oilfield Supply Co. This is to verify that this business account is not incorporated. The contribution represents my personal funds as I am a member of the unincorporated business. The full amount listed above should be attributed to me as it does not represent contributions from more than one person.

Name Sunrise Oilfield Supply Co.

Address 104 S. Broadway, Suite 1400

City Wichita,

State Kansas Zip 67202

Your signature Dick B. DeLano
(please do not print)

MM

ID: U67202 DLNO 104 D 1 Bseq: 007044-0002 Ltr: 10

DEC 11 1987

Paid for by Dole for President Committee

23040955696

214

DOLE
PRESIDENT

1828 L Street, N.W. • Suite 805
Washington, D.C. 20036
(202) 223-9400
(TDD) (202) 223-9400

March 30, 1988

Ms. Joann Monhollon
3328 SW Arrowhead
Topeka, KS 66614

Dear Ms. Joann Monhollon:

Thank you for your generous contribution. In order to submit your contribution for federal matching funds, the Federal Election Commission requires that we obtain additional information. Your contribution was drawn on an account maintained by a business entity. We must verify that your contribution represents your personal funds. It would be helpful if you would read the statement below and if it is accurate, please sign and return it to the Committee in the enclosed postage paid envelope at your earliest convenience.

Again, thank you for your support.

Sincerely,

Nancy L. Dole
Dole for President
Committee

C30409556697

I made a contribution of $15.00, deposited March 14, 1988, and drawn on check #9370 of the account identified as Systems 3. This is to verify that this business account is not incorporated. The contribution represents my personal funds. The full amount listed above should be attributed to me as it does not represent contributions from more than one person.

Joann Monhollon Drawing Account

Name JO ANN MONHOLLON

Home Address 3328 SW ARROWHEAD

City Topeka,

State KS Zip 66614

Your signature Joann Monhollon
(please do not print)

Reunion Comp. account as drawn on salary.

ID: U66614 MNHL 328 U 1 Bseq: 999857-0003 Ltr: 10

APR 19 1988

Paid for by Dole for President Committee

** PLEASE SIGN & RETURN TODAY

DOLE
PRESIDENT

1828 L Street, N.W. • Suite 805
Washington, D.C. 20036
(202) 223-9400
(TDD) (202) 223-9400

April 29, 1988

Mr. Tom Nelms
99 Elkins Lake
Huntsville, TX 77340

Dear Mr. Tom Nelms:

Thank you for your contribution to Senator Dole's Presidential campaign.

Now that Senator Dole has withdrawn from the race, it is of the highest priority that the Dole for President Committee use every available resource to meet its financial obligations, enabling Senator Dole to concentrate on projecting his message of Party unity toward Republican victories in November.

If the statement below accurately reflects your contribution, please fill in your correct home address, sign the form and return it with the enclosed envelope. This will allow us to maximize your contribution through Federal Matching Funds. If you have previously received similar correspondence from the campaign, it is very important that each letter be signed and returned to the Committee without delay.

Thank you for your past support and assistance in helping us maximize your contribution to Senator Dole's campaign.

Sincerely,

5/10

Mr. James L. Hagen
Dole for President Committee, Inc.

I made a contribution of $50.00, deposited October 16, 1987, and drawn on check #1100 of the account identified as Tom Nelms Associates. This is to verify that this business account is not incorporated. The contribution represents my personal funds. The full amount listed above should be attributed to me as it does not represent contributions from more than one person.

Name TOM NELMS MAY 12 RECD

Home Address 99 ELKINS LAKE

City HUNTSVILLE State TX Zip 77340

Contributor's signature Tom Nelms

ID: U77340 NLMS 099 T 1 Bseq: 006203-0002 Ltr: 10

Paid for by Dole for President Committee.

23040955698

** PLEASE SIGN & RETURN TODAY

DOLE
PRESIDENT

1828 L Street, N.W. • Suite 805
Washington, D.C. 20036
(202) 223-9400
(TDD) (202) 223-9400

May 23, 1988

Mr. William A. Lamb
5110 N Central Ave #220
Phoenix, AZ 85012

Dear Mr. William A. Lamb:

Thank you for your contribution to Senator Dole's Presidential campaign.

Now that Senator Dole has withdrawn from the race, it is of the highest priority that the Dole for President Committee use every available resource to meet its financial obligations, enabling Senator Dole to concentrate on projecting his message of Party unity toward Republican victories in November.

If the statement below accurately reflects your contribution, please fill in your correct home address, sign the form and return it with the enclosed envelope. This will allow us to maximize your contribution through Federal Matching Funds. If you have previously received similar correspondence from the campaign, it is very important that each letter be signed and returned to the Committee without delay.

Thank you for your past support and assistance in helping us maximize your contribution to Senator Dole's campaign.

Sincerely,

Mr. James L. Hagen
Dole for President Committee, Inc.

RECEIVED
JUN 16 1988

I made a contribution of $25.00, deposited May 12, 1988, and drawn on check #8123 of the account identified as United Petro Ltd. This is to verify that this business account is not incorporated. The contribution represents my personal funds. The full amount listed above should be attributed to me as it does not represent contributions from more than one person.

Name William A. Lamb

Home Address 7010 N. 13th Place

City Phoenix State Arizona Zip 85020-5407

Contributor's signature William A Lamb

ID: U85012 LAMB 110 W 1 Bseq: 013204-0001 Ltr: 10

Paid for by Dole for President Committee.

23040955699

228

DOLE
PRESIDENT

1828 L Street, N.W. • Suite 805
Washington, D.C. 20036
(202) 223-9400
(TDD) (202) 223-9400

Mr. Mark Crittenden
2554 Lincoln Boulveard
Suite 316
Marina Del Rey, CA 90291

January 15, 1988

Dear Mr. Mark Crittenden:

Thank you for your generous contribution. In order to submit your contribution for federal matching funds, the Federal Election Commission requires that we obtain additional information. Your contribution was drawn on an account maintained by a business entity. We must verify that your contribution represents your personal funds. It would be helpful if you would read the statement below and if it is accurate, please sign and return it to the Committee in the enclosed postage paid envelope at your earliest convenience.

Again, thank you for your support.

BB 1/29

Sincerely,

Nancy L. Dole

Dole for President
Committee

I made a contribution of $750.00, deposited July 23, 1987, and drawn on check #3903 of the account identified as United Supply Co. This is to verify that this business account is not incorporated. The contribution represents my personal funds. The full amount listed above should be attributed to me as it does not represent contributions from more than one person.

Name Mark R. Crittenden - Sole ownership

Home Address 2210 Wilshire Blvd. #306

City Santa Monica

State CA. zip 90403

Your signature M R. Crittenden
(please do not print)

JAN 28 1988

ID: U90291 CRTT 316 M 1 Bseq: 002683-0001 Ltr: 10

Paid for by Dole for President Committee

23040955700

230

DOLE
PRESIDENT

1828 L Street, N.W. • Suite 805
Washington, D.C. 20036
(202) 223-9400
(TDD) (202) 223-9400

RECEIVED
JAN 16 1988
VAUGHN ORGANIZATION INC
ARCHITECTS. TRENTON, N.J.

January 13, 1988

Mr. Ronald E. Vaughn
42 W Lafayette St
Trenton, NJ 08608

Dear Mr. Ronald E. Vaughn:

Thank you for your generous contribution. In order to submit your contribution for federal matching funds, the Federal Election Commission requires that we obtain additional information. Your contribution was drawn on an account with a designation indicating that it might contain funds other than your personal funds. We must verify that your contribution represents only your personal funds. It would be helpful if you would read the statement below and if it is accurate, please sign and return it to the Committee in the enclosed postage paid envelope at your earliest convenience.

Again, thank you for your support.

Sincerely,

Nancy A. Reichardt

Dole for President
Committee

I made a contribution of $1,000.00, deposited December 4, 1987, and drawn on check #1088 of the account identified as Vaughn Organization. This is to verify that the contribution described above is drawn on an account containing only my personal funds. The account is not funded for my use on an unreimbursed basis by an incorporated entity.

Name RONALD E VAUGHN

JAN 20 1988

Home Address 3 MORTON COURT

City LAWRENCEVILLE

State N.J. Zip 08648

Your signature Ronald E Vaughn
(please do not print)

THV 1/20

ID: U08608 VGHN 042 R 1 Bseq: 008522-0016 Ltr: 12

Paid for by Dole for President Committee

23040955701

RECEIVED
SEP 15 1987

BOB DOLE President

RECEIVED
SEP 15 1987

August 31, 1987

Mr. Vaughn Peterson
319 N Madison
Smith Center, KS 66967

Dear Mr. Vaughn Peterson:

Thank you for your recent contribution. However, Federal law requires that we obtain additional information before we can accept or submit for matching funds a contribution drawn on an account maintained by a business entity. If the statement below is accurate, will you please sign and return it to us at your earliest convenience?

Thank you for your help.

Sincerely,

Renee J. Smith

Dole for President
Exploratory Committee

I made a contribution of $108.00, deposited July 15, 1987, and drawn on check #379 of the account identified as V. P. Enterprises. This is to verify that this business account is not incorporated. The contribution represents my personal funds as I am a member of the unincorporated business. The full amount listed above should be attributed to me as it does not represent contributions from more than one person.

Name Vaughn Peterson

Address 319 N. Madison

City Smith Center

State Kansas Zip _____

Your signature Vaughn Peterson
(please do not print)

ID: U66967 PTRS 319 V 1 Bseq: 002438-0001 Ltr: 10

1828 L Street, N.W., Suite 805, Washington, D.C. 20036
(202) 223-9400
Paid for by Dole for President Exploratory Committee

23040955702

239

DOLE
PRESIDENT

1828 L Street, N.W. • Suite 805
Washington, D.C. 20036
(202) 223-9400
(TDD) (202) 223-9400

December 17, 1987

Mr. C. E. Hamsher
2415 Main
Parsons, KS 67357

Dear Mr. C. E. Hamsher:

Thank you for your recent contribution. However, Federal law requires that we obtain additional information before we can accept or submit for matching funds a contribution drawn on an account maintained by a business entity. If the statement below is accurate, will you please sign and return it to us at your earliest convenience?

Thank you for your help.

Sincerely,

Nancy A. Roda

Dole for President
Exploratory Committee

I made a contribution of $25.00, deposited November 13, 1987, and drawn on check #1835 of the account identified as Wardrobe Cleaners. This is to verify that this business account is not incorporated. The contribution represents my personal funds as I am a member of the unincorporated business. The full amount listed above should be attributed to me as it does not represent contributions from more than one person.

Name C Eugene Hamsher

Address 2415 Main

City Parsons

State Kansas Zip 67357

Your signature C E Hamsher
(please do not print)

DEC 28 1987

ID: U67357 HMSH 415 C 1 Bseq: 007617-0019 Ltr: 10

Paid for by Dole for President Committee

TH✓
12/30

930409557703

DOLE
PRESIDENT

1828 L Street, N.W. • Suite 805
Washington, D.C. 20036
(202) 223-9400
(TDD) (202) 223-9400

January 13, 1988

Mr. D. R. Hinkley
1391 Capinero Dr
Pasadena, CA 91105

Dear Mr. D. R. Hinkley:

Thank you for your generous contribution. In order to submit your contribution for federal matching funds, the Federal Election Commission requires that we obtain additional information. Your contribution was drawn on an account maintained by a business entity. We must verify that your contribution represents your personal funds. It would be helpful if you would read the statement below and if it is accurate, please sign and return it to the Committee in the enclosed postage paid envelope at your earliest convenience.

Again, thank you for your support.

Sincerely,

Dole for President
Committee

I made a contribution of $5.00, deposited November 30, 1987, and drawn on check #7649 of the account identified as Wilshire Center Cameras. This is to verify that this business account is not incorporated. The contribution represents my personal funds. The full amount listed above should be attributed to me as it does not represent contributions from more than one person.

Name _____

Home Address _____ See over

City _____

State _____ Zip _____

Your signature _____ JAN 21 1988
(please do not print)

ID: U91105 HNKL 391 D 1 Bseq: 008270-0012 Ltr: 10

Paid for by Dole for President Committee.

93040955704

Sorry to cause you this trouble.

Wilderness Centers Campaign is a sub chapter S corporation. I am the sole stockholder. I hope that makes it a personal contribution.

J R Dunkle

JAN 21

93040955705

C4116

I made a contribution of $25.00, deposited November 5, 1987, and drawn on check #554 of the account identified as Amer Standard Appliance Protec. This is to verify that this business account is not incorporated. The contribution represents my personal funds as I am a member of the unincorporated business. The full amount listed above should be attributed to me as it does not represent contributions from more than one person.

Name BeLFred J. STARKey

Address 4125 N. CAREFREE

City COLO SPRINGS

State COLO Zip 80917

Your signature Delfred J Starkey
(please do not print)

ID: U80917 STRK 125 D 1 Bseq: 007261-0013 Ltr: 10

JAN 05 1988

Paid for by Dole for President Committee

23040955706

BOB DOLE President

September 11, 1987

Jeffrey D. Sussman
1621 N Olden Avenue
Trenton, NJ 08638

Dear Jeffrey D. Sussman:

Thank you for your recent contribution. However, Federal law requires that we obtain additional information before we can submit for matching funds a contribution drawn on an account maintained by partnerships, groups, associations or other types of non-personal accounts. If the statement below is accurate, will you please sign and return it and the additional pages to the Committee at your earliest convenience?

Thank you for your help.

Sincerely,

Renee J. Smith

Dole for President
Exploratory Committee

A contribution of $1,000.00, deposited August 14, 1987, and drawn on check #289 of the account identified as Ballet Limited Partners is maintained by:

_X_ A partnership, which is non-incorporated.

____ A professional association or professional corporation that is not treated as a corporation under applicable laws of the state of_____.

____ Other group or association (describe).

_____

_____

ID: U08638 SSSM 621 J 1 Bseq: 003636-0005 Ltr: 11

1828 L Street, N.W., Suite 805, Washington, D.C. 20036
(202) 223-9400
Paid for by Dole for President Exploratory Committee

23040955707

The contribution described above represents my personal funds as I am a partner in the partnership (or a member of the association). The full amount as listed above should be attributed to me as it does not represent contributions from more than one person. Or if the check represents contributions from more than one partner, all are listed below.

Name JEFFREY SUSSMAN

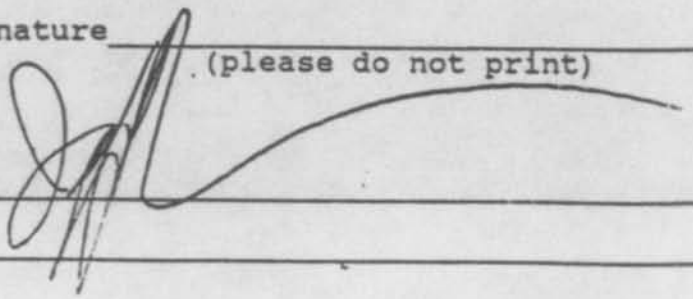
Address 1430 PHEASANT RUN CIRCLE

City YARDLEY

State PENNSYLVANIA Zip 19067

Amount $1,000.00 (PERSONAL FUNDS)

Your signature _____ (please do not print)



Name _____

Address _____

City _____

State _____ Zip _____

Amount _____

Your signature _____ (please do not print)

Name _____

Address _____

City _____

State _____ Zip _____

Amount _____

Your signature _____ (please do not print)

23040955708

14

DOLE
PRESIDENT

1828 L Street, N.W. • Suite 805
Washington, D.C. 20036
(202) 223-9400
(TDD) (202) 223-9400

November 13, 1987

Dr. Bernard M. Zussman
321 Greenway Rd
Memphis, TN 38117

Dear Dr. Bernard M. Zussman:

Thank you for your recent contribution. However, Federal law requires that we obtain additional information before we can accept or submit for matching funds a contribution drawn on an account maintained by a business entity. If the statement below is accurate, will you please sign and return it to us at your earliest convenience?

Thank you for your help.

Sincerely,

Nancy Reda

Dole for President
Exploratory Committee

I made a contribution of $100.00, deposited October 23, 1987, and drawn on check #191 of the account identified as Bernard Zussman Md. This is to verify that this business account is not incorporated. The contribution represents my personal funds as I am a member of the unincorporated business. The full amount listed above should be attributed to me as it does not represent contributions from more than one person.

Name BERNARD M. ZUSSMAN M.D

Address 321 Greenway Rd

City Memphis

State TENN. Zip 38117

Your signature Bernard M Zussman
(please do not print)

NOV 27 1987

ID: U38117 ZSSM 321 B 1 Bseq: 006559-0048 Ltr: 10

6/11
12/1

Paid for by Dole for President Committee

23040955709

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

✓ Microfilm

_____ Public Rcds

_____ Press

THE FOLLOWING DOCUMENTATION IS ADDED TO

THE PUBLIC RECORD IN CLOSED MUR 3309.

2/2/94

94030962857

RECEIVED
94 FEB -2 11 9:53

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Feb 1, 1994

TWO WAY MEMORANDUM

TO: OGC, Docket

FROM: Philomena Brooks PB
Accounting Technician

SUBJECt: Account Determination for Funds Received

We recently received a check from Dole For President Committee, check number 6321, dated 26, Jan. 1994, and in the amount of $8,000.00. 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 $8,000.00, the MUR number is 3309 and in the name of Dole for President Cmte. The account into which it should be deposited is indicated below:

__ Budget Clearing Account (OGC), 95F3875.16

__ Civil Penalties Account, 95-1099.160

✓ Other: Repayment to U.S. Treasurey

Anita Alexander
Signature

02-02-94
Date

94030962858

940309628 59

DOLE FOR PRESIDENT COMMITTEE, INC.
~~1629 L STREET, N.W., SUITE 805~~
~~WASHINGTON, D.C. 20036~~

SIGNET BANK
Vienna, VA Virginia

6321

26 January 1994

68-408/560 405

PAY Eight Thousand and 00/100 DOLLARS $ 8,000.00

TO THE ORDER OF
United States Treasury
c/o Federal Election Commission
999 E Street, NW
Washington, DC 20463

James L. Hagen

⑈00006321⑈ ⑆056004089⑆ 652⑈0024669⑈

94 FEB -2 AM 9:53

RECEIVED
FEDERAL ELECTION
COMMISSION
MAIL ROOM
FEB 1 8 54 AM '94

January 26, 1993

Mr. Lawrence M. Noble, General Counsel
Federal Election Commission
999 E Street, NW
Washington, DC 20463

RECEIVED
FEDERAL ELECTION COMMISSION
94 FEB -2 AM 9:53
OFFICE OF GENERAL COUNSEL

RE: MUR 3309
Dole for President Committee, Inc.
James L. Hagen, as Treasurer

Dear Mr. Noble,

Please find enclosed a check from Dole for President Committee, Inc. in the amount of $8,000.00. This check represents an additional payment to the U.S. Treasury in lieu of refunds made directly to contributors. Nine refund checks previously mailed to contributors were returned to this committee by the United States Postal Service as "undeliverable". Copies of the checks and return envelopes are attached.

If you have any questions, please contact me at 303/320-4040, extension 322.

Respectfully,

James L. Hagen

James L. Hagen, Treasurer
Dole for President Committee, Inc.

Attachment

9403096228 60

9403096286 1

Hagen
8287 S. Syracuse Ct.
Englewood, CO 80112





United Supply Co.
2554 Lincoln Blvd, Suite 316
Marina Del Rey, CA 90291



MOVED, LEFT NO ADDRESS

6314
$750

DOLE FOR PRESIDENT COMMITTEE, INC.

SIGNET BANK
Vienna, VA Virginia

6314

August 17 19 93

68-408/560 405

PAY *Seven Hundred Fifty and 00/100********** DOLLARS $*750.00*

TO THE ORDER OF
United Supply Co.
2554 Lincoln Blvd, Suite 316
Marina Del Rey, CA 90291

James L. Hagen

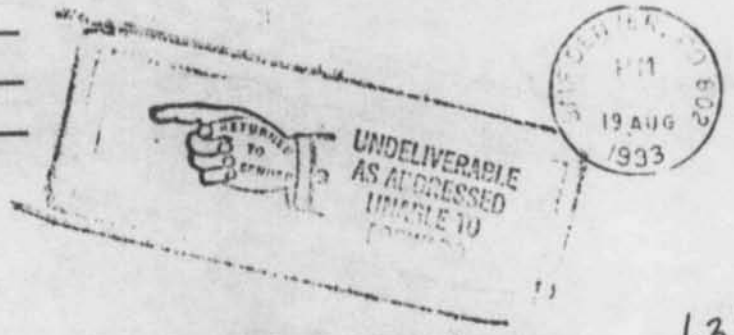
⑈000063 14⑈ ⑆056004089⑆ 652⑈00246699⑈

DELUXE CHECK PRINTERS

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF
94 FEB -2 AM 9:54

94030962862

Hagen
8287 S. Syracuse Ct.
Englewood, CO 80112





6311
#1000

Silvi Concrete Products
1903 [redacted]
Morr[redacted]

RECEIVED
FEDERAL ELECT
OFFICE OF P
94 FEB -2
MISSION

DOLE FOR PRESIDENT COMMITTEE, INC.
[redacted]

SIGNET BANK
Vienna, VA Virginia

6311

August 17 1993

68-408/560 405

PAY *One Thousand and 00/100********** DOLLARS $*1,000.00*

TO THE ORDER OF
Silvi Concrete Products
1903 Bristol Pike
Morrisville, PA 19067

James L. Hagen

⑈00006311⑈ ⑆056004089⑆ 652⑈0024669⑈

DELUXE CHECK PRINTERS

9403096286 3

Hagen

8287 S. Syracuse Ct.

Englewood, CO 80112

RETURN TO SENDER

19 AUG 1993



6308
#1,000

Ronald Book, P.A.
20801 Biscayne Blvd, Suite 401
North Miami Beach, FL 33180 RETURN TO SENDER

94 FEB 22 AM 9:54

FEDERAL RECEIVE
OFFICE

DOLE FOR PRESIDENT COMMITTEE, INC.

SIGNET BANK
Vienna, VA Virginia

6308

August 17 19 93

68-408/560 405

PAY *One Thousand and 00/100********** DOLLARS $*1,000.00*

TO THE ORDER OF
Ronald Book, P.A.
20801 Biscayne Blvd, Suite 401
North Miami Beach, FL 33180

James L. Hagen

⑈00006308⑈ ⑆056004089⑆ 652⑈00246699⑈

DELUXE CHECK PRINTERS

9 4 0 3 0 9 6 2 8 6 4

Hagen
8287 S. Syracuse Ct.
Englewood, CO 80112





6307
#1,000

FOR
W2034

Robert L. Manard, III
221 Carondelet Street, Suite 400
New Orleans, LA 70130

DOLE FOR PRESIDENT COMMITTEE, INC.

SIGNET BANK
Vienna, VA Virginia

6307

August 17 19 93

68-408/560 405

PAY *One Thousand and 00/100********** DOLLARS $*1,000.00*

TO THE ORDER OF
Robert L. Manard, III
221 Carondelet Street, #400
New Orleans, LA 70130

James L. Hagen

⑈00006307⑈ ⑆056004089⑆ 652⑈00246699⑈

DELUXE CHECK PRINTERS

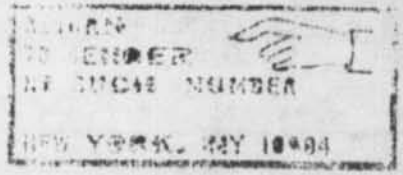
RECEIVED
FEDERAL ELECTION COMMISSION
94 FEB -2 AM 9:54

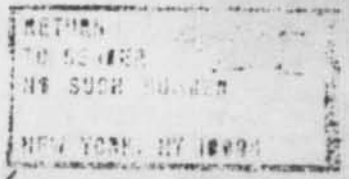
9 4 0 3 0 9 6 2 8 6 5

Hagen
8287 S. Syracuse Ct.
Englewood, CO 80112









Palmeri Harvey Young & Co.
111 Broadway, Suite 1308
New York, NY 10006

6305

$1000

DOLE FOR PRESIDENT COMMITTEE, INC.

SIGNET BANK
Vienna, VA Virginia

6305

August 17 1993

68-608/560 405

PAY *One Thousand and 00/100********** DOLLARS $*1,000.00*

TO THE ORDER OF
Palmeri Harvey Young & Co.
111 Broadway, Suite 1308
New York, NY 10006

James L. Hagen

⑈00006305⑈ ⑆056004089⑆ 652⑈00246699⑈

DELUXE CHECK PRINTERS

RECEIVED
FEC
94 FEB -2 AM 9:54
FEDERAL ELECTION COMMISSION

9 4 0 3 0 9 6 2 8 6 6

Hagen
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Los Angeles, CA 90010

James L. Hagen

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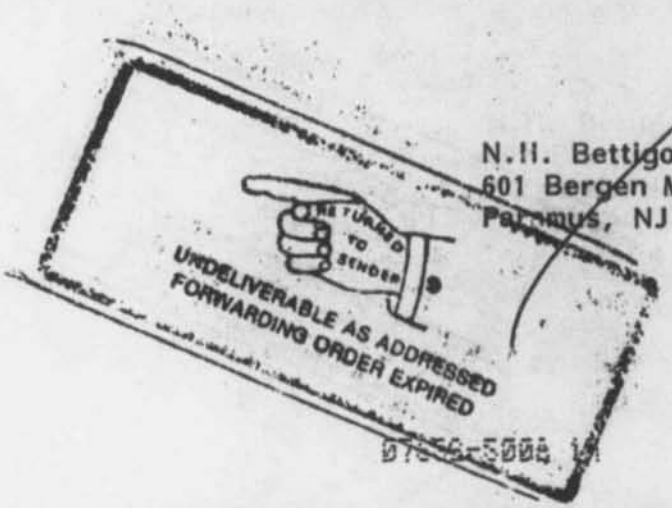
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N.H. Bettigole Co.
601 Bergen Mall
Paramus, NJ 07652

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Vienna, VA Virginia

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N. H. Bettigole Co.
601 Bergen Mall
Paramus, NJ 07652

James L. Hagen

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Lauren K. Welch, M.D.
3243 E. Murdock, Suite 601
Wichita, KS 67208

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Vienna, VA Virginia

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PAY *Seven Hundred Fifty and 00/100********** DOLLARS $*750.00*

TO THE ORDER OF
Lauren K. Welch, M.D.
3243 E. Murdock, Suite 601
Wichita, KS 67208

James L. Hagen

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111 Eighth Avenue
New York, NY 10011

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PAY *One Thousand and 00/100********** DOLLARS $*1,000.00*

TO THE ORDER OF
Kwik International Color LTD
111 Eighth Avenue
New York, NY 10011

James L. Hagen

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