



FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR # 453





FEDERAL ELECTION COMMISSION

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

December 20, 1977

Mr. Ronald D. Gonzales
Investigator, Enforcement Division
California Fair Political Practices
Commission
P.O. Box 807
Sacramento, California 95804

Re: MUR 453

Dear Mr. Gonzales:

On December 7, 1977, the Commission voted to terminate its investigation in MUR 453. A copy of the Commission's determination and the General Counsel's Report is enclosed for your information. Accordingly, the Commission intends to close its files in this matter.

If further information comes to your attention which you believe establishes a violation of the Federal Election Campaign Act of 1971, as amended, please contact me.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "William C. Oldaker".

William C. Oldaker
General Counsel

Enclosures

1. Commission certification
2. General Counsel's Report



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Mr. Ronald D. Gonzales
Investigator, Enforcement Division
California Fair Political Practices
Commission
P.O. Box 807
Sacramento, California 95804

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Sincerely yours,

William C. Oldaker
General Counsel

Enclosures

1. Commission certification *SM*
2. General Counsel's Report



FEDERAL ELECTION COMMISSION

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

December 20, 1977

Mr. Jeffrey P. Eves, Treasurer
Potlatch Corporation
P.O. Box 7864
San Francisco, California 94120

Re: MUR 453

Dear Mr. Eves:

On December 7, 1977, the Commission voted to terminate its investigation in MUR 453. A copy of the Commission's determination and the General Counsel's Report is enclosed for your information. Accordingly, the Commission intends to close its files in this matter.

Thank you for your cooperation and assistance in this matter.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "W. C. Oldaker", is written over a horizontal line.

William C. Oldaker
General Counsel

Enclosure



7 3 3 4 0 0 3 3 1 1

Mr. Jeffrey P. Eves, Treasurer
Potlatch Corporation
P.O. Box 7864
San Francisco, California 94120

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Thank you for your cooperation and assistance in this matter.

Sincerely yours,

William C. Oldaker
General Counsel

Enclosure *sm*

BEFORE THE FEDERAL ELECTION COMMISSION

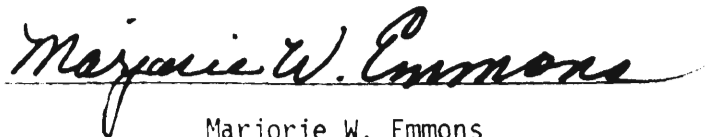
In the Matter of)
)
Potlatch Corporation)

MUR 453 (77)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on December 7, 1977, the Commission determined by a vote of 5-0 to find no reasonable cause to believe that Potlatch Corporation violated 2 U.S.C. Section 441b(a) and to close the file in the above-captioned matter.

Commissioner Springer was not present at the time of the vote.



Marjorie W. Emmons
Secretary to the Commission

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FEDERAL ELECTION COMMISSION

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

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

77 DEC 2 P3: 12

December 2, 1977

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 453 Team #1 Marshall

Please have the attached General Counsel's Report on MUR 453 distributed to the Commission and placed on the Compliance Agenda for the Commission meeting of December 7, 1977.

Thank you.

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL



FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

\$5,000 to the Salute to President Ford Dinner Committee - California Fund (emphasis added). This fund was a separate segregated account whose funds were limited, according to the solicitation material, to the support of candidates for state office and to the general overhead costs of the Republican State Central Committee of California and the San Francisco United Republican Finance Committee. The California Secretary of State's office verified by telephone the existence of a "Salute to President Ford Dinner Committee - California Fund" and the report of a \$5,000 contribution of Potlatch Corporation to that fund.

III. Analysis

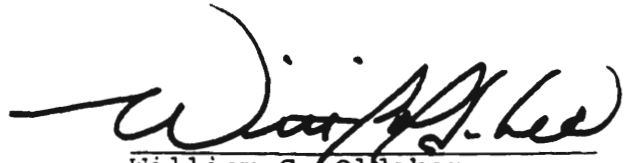
The contribution reported by Potlatch Corporation to the Salute to President Ford Dinner does not constitute a corporate contribution in connection with a Federal election. The contribution was designated for the "California Fund" and thus limited in use to support of candidates for state office and to the general overhead expenses of the Republican State Central Committee of California and the San Francisco United Republican Finance Committee. There is no evidence to suggest that this contribution was used in connection with a Federal election. There was no prohibition against corporate contributions under California law in 1976.

IV. Recommendation

Close file since the investigation indicates there is no reasonable cause to believe that Potlatch Corporation violated 2 U.S.C. §441b(a). Send attached letters.

12/2/77

Date



William C. Oldaker
General Counsel

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

ATTACHMENT 1
McC 1973
Potlatch

FEDERAL ELECTION COMMISSION

'77 NOV AM 10:33

Potlatch Corporation

Two Embarcadero Center, 20th Floor
P.O. Box 7864
San Francisco, California 94120
Telephone (415) 981-1525

October 28, 1977

Ms. Sherry Marshall
Office of the General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D. C. 20463

703223

Dear Ms. Marshall

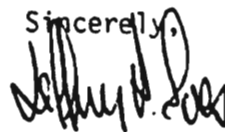
Re: MUR 453

This communication replies to our receipt of Mr. Oldaker's letter of October 21 and my subsequent conversation with Mr. Randy Johnson of your office this morning.

The \$5,000 corporate contribution to which Mr. Oldaker refers was made to the Salute to President Ford Dinner Committee - California Fund on September 22, 1976. These funds did not constitute a corporate contribution to any candidate for federal office and were used only for local and state candidates within California, which is permissible under California law. Confusion over this matter undoubtedly stems from the fact that the words "California Fund" (which do appear on our check) did not appear in our FPPC report to the state.

I've attached to this letter copies of the front and back of our check and a copy of the form transmittal document which states the method of handling corporate contributions. Should you need additional information or clarification in order to properly dispose of this matter, please feel free to contact me.

Sincerely,



Jeffrey P. Eves
Manager, Government Relations

JPE:mc
Enclosures

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

SALUTE TO PRESIDENT FORD DINNER COMMITTEE

Yes, I am pleased to participate in the Salute to President Ford closed circuit television and film program Thursday, October 7, 1976, Sheraton-Palace Hotel, San Francisco, California.

I wish to purchase one table(s) of ten each at \$5,000 per table . . . \$5,000

I wish to purchase _____ ticket(s) at \$500 per ticket \$_____

Enclosed is my check in the amount of \$ 5,000.

Checks should be made payable to the "Salute to President Ford Dinner."

I am sorry I am unable to attend but my contribution of \$ _____ is enclosed.

Name Potlatch Corporation

Residence Address _____
(STREET)

(STEP 2)

(CITY)

(ZIP)

(T L' / r i c a c)

Employer

Business Address 1 Maritime Plaza, 24th Floor
(STREET)

(STREET)

San Francisco

- Calif.

9-1111

981-5480

(CITY)

(21.7)

(1100-1102)

Occupation or Title _____

If Self-employed, place of business:

(Federal and State laws require disclosure of political contributors' occupation and business as well as residence address)

PERSONAL contributions are solicited and will be deposited in the Salute to President Ford Committee account and reported under Federal Election Campaign Act as amended.

CORPORATE CONTRIBUTIONS are legal and acceptable under California law, and their use will be limited to the support of candidates for state office, in addition to general overhead of the Republic State Central Committee of California and the San Francisco United Republican Finance Committee within the State of California. All corporate contributions will be deposited in a "Salute to President Ford Dinner Committee — California Fund" account and reported under the Political Reform Act of 1974.

Counties will receive credit against their Republican State Committee quotas.

A copy of our report (individual contributions) is filed with the Federal Election Commission and available for purchase from the Federal Election Commission, Washington, D. C. A copy of our report (corporate contributions which should be made payable to the "Salute to President Ford Democratic Caucus --- California Fund") is filed with the Secretary of State, State of California.

235 Montgomery Street • Suite 1023 • San Francisco, California 941

Hopper Printing Company

246 Post Sheet

San Francisco, California 94

FEDERAL ELECTION COMMISSION
NATIONAL BILL COPY
OFFICE OF GENERAL COUNSEL

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
 OFFICE OF GENERAL COUNSEL

SALUTE TO PRESIDENT FORD
 DINNER COMMITTEE - CALIFORNIA
 FUND

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 7-2672

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BANK OF AMERICA N.T. & S.A.

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 BANK OF AMERICA N.T. & S.A.
 SAN FRANCISCO CALIF 448

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 BANK OF AMERICA, N.T. & S.A.
 SAN FRANCISCO, CALIF.

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FEDERAL ELECTION COMMISSION

1325 K STREET NW
WASHINGTON, DC 20463

Mr. Jeffrey P. Eves, Treasurer
Potlatch Corporation
P.O. Box 7864
San Francisco, California 94120

Re: MUR 453

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Thank you for your cooperation and assistance in this matter.

Sincerely yours,

William C. Oldaker
General Counsel

Enclosure

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL





FEDERAL ELECTION COMMISSION

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

Mr. Ronald D. Gonzales
Investigator, Enforcement Division
California Fair Political Practices
Commission
P.O. Box 807
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General Counsel

Enclosures

1. Commission certification
2. General Counsel's Report

FEDERAL ELECTION COMMISSION
OFFICE OF THE GENERAL COUNSEL
WASHINGTON, D.C. 20463



200 1977
Potlatch

FED

Potlatch Corporation

77 NOV

10:33

October 28, 1977

Ms. Sherry Marshall
Office of the General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D. C. 20463

10:33

Dear Ms. Marshall

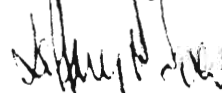
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Jeffrey P. Eves
Manager, Government Relations

JPE:mc
Enclosures

FEDERAL ELECTION COMMISSION
OFFICIAL FILE
OFFICE OF GENERAL C.

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I wish to purchase _____ ticket(s) at \$500 per ticket \$. . .

Enclosed is my check in the amount of \$5,000.

Checks should be made payable to the "Salute to President Ford Dinner."

I am sorry I am unable to attend but my contribution of \$_____ is enclosed.

Name Potlatch Corporation

Residence Address

CONCLUSIONS

(CITY)

(212)

(CL 9-0-00000)

Employer

Business Address 1 Maritime Plaza, 24th Floor

(13) (TINNEY)

San Francisco

Calif. 94111

981-5980

(57)

17121

REFERENCES

Occupation or Title

If Self-employed, place of business:

(Federal and State laws require disclosure of political contributors' occupation and business address as well as residence address.)

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A copy of our report (individual contributions) is filed with the Federal Election Commission and is available for purchase from the Federal Election Commission, Washington, D. C. A copy of our report (corporate contributions which should be made available to the "Salute to President Ford Dinner Series" — California Fund) is filed with the Secretary of State, State of California.

235 Montgomery Street • Suite 1023 • San Francisco, California 94104

Hooper Printing Company

2001, 4 Street

San Francisco, California 94109

Potlatch Corporation

Ms. Sherry Marshall
Office of the General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D. C. 20463



FEDERAL ELECTION COMMISSION

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

October 21, 1977

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Jeffrey P. Eves, Treasurer
Potlach Corporation
P. O. Box 3591
San Francisco, CA 94119

FEDERAL ELECTION COMMISSION
OFFICIAL FILE
OFFICE OF GENERAL COUNSEL

Re: MUR 453

Dear Mr. Eves:

On October 19, 1977, the Federal Election Commission found reason to believe that Potlach Corporation may have violated the Federal Campaign Act of 1971, as amended, (the "Act") by making a corporate contribution in connection with an election for Federal office. Specifically, the \$5,000 contribution to the Salute to President Ford Dinner, as reported by Potlach Corporation to the California Fair Political Practices Commission, appears to violate 2 U.S.C. §441b(a). A copy of that report is enclosed.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal information which you believe is relevant to the Commission's investigation of this matter. In addition, please submit a copy of any checks (front and back) and any other documents involved in this transaction. Any statements or explanations should be made under oath.

The Commission is under a duty to investigate this matter expeditiously. Therefore, any statements or explanations which you wish to submit to the Commission with regard to this matter should be submitted within ten (10) days of receipt of this notification. If you have any questions, please contact Ms. Sherrie Marshall,



- 2 -

at (202) 523-4039, the attorney assigned to this matter.

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3)(B) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,



William C. Oldaker
General Counsel

Enclosures

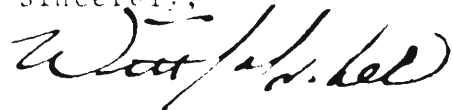
OFFICE
GENERAL COUNSEL

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William C. Oldaker
General Counsel

Enclosures

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RETURN RECEIPT REQUESTED

Mr. Jeffrey P. Eves, Treasurer
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P. O. Box 3591
San Francisco, CA 94119

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FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

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Sincerely,

William C. Oldaker
General Counsel

Enclosures *SM 10/19*

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Potlach Corporation)

MUR 453 (77)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on October 19, 1977, the Commission adopted the recommendation of the staff to find Reason to Believe that a violation of 2 U.S.C., Section 441b(a), had been committed in the above-captioned matter.



Marjorie W. Emmons
Secretary to the Commission

OCT 19 1977

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL



FEDERAL ELECTION COMMISSION

1300 K STREET N.W.
WASHINGTON, D.C. 20463

October 19, 1977

MEMORANDUM TO: CHARLES STEELE
FROM: MARJORIE W. EMMONS *mwe*
SUBJECT: "MR 453 (77) - First General Counsel's Report

The above-mentioned document was transmitted to the
Commissioners on October 17, 1977.

As of 9:00 a.m., October 19, 1977, no objections have been
received in the Office of Commission Secretary to the staff
recommendation that reason to believe be found against Potlach
Corporation.



FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
DATE OF DEPOSIT: 10/19/77



FEDERAL ELECTION COMMISSION

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

October 24, 1977

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 453 (77)

Please have the attached 7 Day Report on MUR _____ ()
distributed to the Commission on a 24 hour no-objection
basis.

Thank you.



FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

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

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL
BY OGC TO THE COMMISSION _____

MUR NO. 453
DATE COMPLAINT RECEIVED
BY OGC _____

ATTORNEY S. Marshall

COMPLAINANT'S NAME: Arose in the normal course of the
Commission's supervisory respon-
sibilities

RESPONDENT'S NAME: Potlach Corporation
P. O. Box 3591
San Francisco, CA 94119

RELEVANT STATUTE: 2 U.S.C. §441b

INTERNAL REPORTS CHECKED: Potlach Employees Political Committee
Reports
Republican National Committee Disclo-
sure Statements

FEDERAL AGENCIES CHECKED: None

SUMMARY OF ALLEGATIONS

The California Fair Political Practices Commission sent to the Commission a copy of a "Major Donor's Statement" (Attachment I) submitted to it by Potlach Corporation pursuant to California election law. This statement disclosed an apparent corporate contribution in violation of 2 U.S.C. §441b(a), as Potlach Corporation reported a \$5,000 contribution to a Salute to President Ford Dinner.

PRELIMINARY LEGAL ANALYSIS

It is unlawful for any corporation whatever to make a contribution or expenditure in connection with a Federal election. 2 U.S.C. §441b(a). A "contribution" for purposes of §441b is a "direct or indirect payment... to any ... political party or organization, in connection with any election ...". 2 U.S.C. §441b(b) (2).

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

The Republican National Committee (hereinafter the "RNC") sponsored numerous Salute to President Ford Dinners throughout the country in 1976 as fundraisers for the RNC and affiliated local committees (See Attachment 2). Apparently the contribution reported by Potlach Corporation was a direct payment from the corporation to the RNC for such a fundraiser.¹ Contributions to political party fundraisers have been found by the Commission to be "in connection with federal elections". (See AO-1975-4). Unless this corporate contribution was specifically designated for the purpose of defraying construction and acquisition costs of an office facility pursuant to 2 U.S.C. §441b, Regulations §114.1(a)(2)(ix), it would appear to be an illegal corporate contribution.

RECOMMENDATION

Find reason to believe that Potlach Corporation violated 2 U.S.C. §441b(a). Send attached letter.

¹There is no evidence from the reports filed with the Commission by the Potlach Corporation Employee Political Action Committee of a contribution by that committee to either the RNC or a Salute to President Ford Dinner.

RECEIVED
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

MAJOR DONOR'S CAMPAIGN STATEMENT

This form should be completed by persons who made cash or cash equivalent contributions directly to candidates or committees totaling \$5,000 or more in a calendar year. Persons who receive contributions and make expenditures may file Form 420.

(GOVERNMENT CODE SECTION 84200-84214)

Statement covers period 1/07/76 through 10/18/76

FOURTECH CORPORATION

ATTACHMENT 1
RECEIVED
AND FILED
Office of the Secretary of State
of the State of California
NOV 19 1976

MAJOR DONOR'S CAMPAIGN STATEMENT
FOR OFFICIAL USE ONLY
A
B

GENERAL ADDRESS (IND. AND STREET)	(CITY)	(STATE)	(ZIP CODE)	(AREA CODE)	(PHONE NO.)
P.O. Box 3591	San Francisco	California	94119	415/981-5950	
MESSAGE ADDRESS (IND. AND STREET)	(CITY)	(STATE)	(ZIP CODE)	(AREA CODE)	(PHONE NO.)

LINE 1 ☒ LINE 2 ☐ OTHER ☐

IF APPLICABLE, USE FOR MAILING ADDRESS (Post Office Box or Street for P.O. Box Number, City, State and Zip Code)

TREASURER (Complete this part only if major donor is an organization)

Jeffrey P. Evans

GENERAL ADDRESS (IND. AND STREET)	(CITY)	(STATE)	(ZIP CODE)	(AREA CODE)	(PHONE NO.)
P.O. Box 3591	San Francisco	California	94119	415/981-5950	
MESSAGE ADDRESS (IND. AND STREET)	(CITY)	(STATE)	(ZIP CODE)	(AREA CODE)	(PHONE NO.)

CONTRIBUTIONS MADE TO: (Amounts may be rounded off to whole dollars)

OFFICIAL USE ONLY	DATE, NAME OF CANDIDATE AND OFFICE OR NAME OF COMMITTEE AND FOL NUMBER*	AMOUNT THIS PERIOD	CUMULATIVE AMOUNT
	11/03/75 San Francisco Committee for City Pay Reform, #816-075	\$ 500.00	\$ 500.00
	10/20/75 Presidential Luncheon Committee (State Candidates), #746-320	2,500.00	2,500.00
	2/19/76 California Chamber of Commerce - 2/3 Initiative Legal Defense Fund	150.00	150.00
	3/15/76 Citizens for Jobs and Energy, #746-250	1,000.00	1,000.00
	4/01/76 California for Yes on Proposition 13	1,500.00	1,500.00
	7/13/76 United for California, #74163	500.00	500.00
	9/1/76 Salute to President Ford Dinner, FLC #00010	5,000.00	5,000.00
	10/1/76 California Manufacturers Association - Political Education Program, #700754	1,000.00	1,000.00
	SUBTOTAL (Carry with additional subtotals to Line 1, Part V)	\$ 12,150.00	

* Committee does not have D.H. No. 1, 1 for name and address of treasurer

YOU MUST COMPLETE THE SUMMARY AND VERIFICATION ON PAGE 2

OFFICIAL USE ONLY					
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Republican National Committee.

Finance Chairman
Jeremiah Milbank

78 DEC 14 AM 4:10

December 13, 1976

Miss Irene Allen
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Dear Miss Allen:

Attached please find the amendments to the FEC report of the Republican National Committee. Also please note that the Salute to the President Dinner was a separate bank account, but not a separate committee. It has been reported as part of the Republican National Committee - Contributions.

Thank you.

Sincerely,

Rodney A. Smith

Rodney A. Smith
Finance Director

Attachments

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

Stacy D. Smith

Republican
National
Committee

The Salute to the President Dinners at the following locations were held on the evening of October 7, 1976.

Atlanta, Georgia
Birmingham, Alabama
Chicago, Illinois
Cleveland, Ohio
Dallas-Fort Worth, Texas
Denver, Colorado
Detroit, Michigan
Houston, Texas
Jacksonville, Florida
Los Angeles, California
Miami, Florida
Minneapolis, Minnesota
Nashville, Tennessee
New Orleans, Louisiana
Philadelphia, Pennsylvania
San Francisco, California
Seattle, Washington
St. Petersburg, Florida
St. Louis, Missouri
Tulsa, Oklahoma
Wichita, Kansas

The Salute to the President Dinner in New York City, New York was held on October 12, 1976.

FEDERAL ELECTION COMMISSION
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OFFICE OF GENERAL COUNSEL



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Jeffrey P. Eves, Treasurer
Potlach Corporation
P. O. Box 3591
San Francisco, CA 94119

Re: MUR 453

Dear Mr. Eves:

On October , 1977, the Federal Election Commission found reason to believe that Potlach Corporation may have violated the Federal Campaign Act of 1971, as amended, (the "Act") by making a corporate contribution in connection with an election for Federal office. Specifically, the \$5,000 contribution to the Salute to President Ford Dinner, as reported by Potlach Corporation to the California Fair Political Practices Commission, appears to violate 2 U.S.C. §441b(a). A copy of that report is enclosed.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal information which you believe is relevant to the Commission's investigation of this matter. In addition, please submit a copy of any checks (front and back) and any other documents involved in this transaction. Any statements or explanations should be made under oath.

The Commission is under a duty to investigate this matter expeditiously. Therefore, any statements or explanations which you wish to submit to the Commission with regard to this matter should be submitted within ten (10) days of receipt of this notification. If you have any questions, please contact Ms. Sherrie Marshall,



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at (202) 523-4034, the attorney assigned to this matter.

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3)(B) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,

William C. Oldaker
General Counsel

Enclosures

7304006319

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September 13, 1977

NOTE FOR CHARLIE STEELE

Attached is correspondence recently received from the California Fair Political Practices Commission for evaluation by OGC-Enforcement staff.

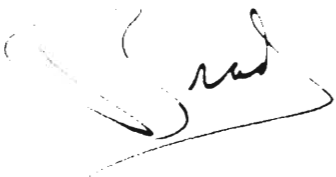
As indicated in the letter, Mr. Gonzales spoke with me by telephone summarizing his investigative finding of an apparent corporate contribution to the Salute to President Ford Dinner. I requested that he forward any relevant materials for our consideration of possible violations of FECA. The California FPPC investigation was launched as a result of its inquiry into the non-Federal election campaign of Mr. Mendelson, a Carter nominee to a position of Assistant Secretary in the Department of Interior.

A very preliminary check (in Federal Register index of 4/14/77) of committees registered with the FEC indicates no registered committee by the name of Salute to President Ford Dinner. There is, however, a committee registered with the name "Presidential Luncheon Committee (Federal Account)" located in San Francisco, California, registration number of C00043299. Since the contribution was obviously made during the general election campaign period, it may be that our further inquiry will disclose that the Salute Dinner committee received contributions in conjunction with an appearance by former President Ford which contributions, however, were restricted to the support of candidates for non-Federal office.

I have not acknowledged the letter from Mr. Gonzales and the correspondence control has been referred to you. You will note his request for our views.

Attachment

cc: Bill Oldaker


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OFFICE OF GENERAL COUNSEL

State of California



Fair Political Practices Commission

P.O. BOX 807 • SACRAMENTO, 95804 ••• 1100 K STREET BUILDING, SACRAMENTO, 95814

REC # 1408
77 SEP 13 1977

September 8, 1977

Brad Richfield, Esq.
Office of the General Counsel
Federal Elections Commission
1325 K Street, N.W.
Washington, D.C. 20463

Dear Mr. Richfield:

Pursuant to our telephone conversation of this date, I am enclosing a copy of the "Major Donor's Campaign Statement" filed by the Potlatch Corporation in compliance with California's Political Reform Act. Also enclosed is a letter from the Potlatch Corporation which indicates that contributions are made directly from the corporation.

As I mentioned, while our State's law does not require the disclosure of contributions to federal candidates, Potlatch did report (on page 1) a contribution of \$5,000 to the "Salute to President Ford Dinner", FEC #000010, on September 22, 1976. While I am unfamiliar with the Federal Elections Code, I do believe that corporate contributions such as this are prohibited.

After your review of the facts surrounding this contribution, I would appreciate learning of its legality since, if the contribution is prohibited such fact may tend to show a pattern which could strengthen our investigation into Potlatch's contribution to California State candidates.

Please be assured of our continuing cooperation in matters of mutual concern. If I can be of any assistance to you, please let me know.

Sincerely,

Robert D. Gonzales
Investigator
Enforcement Division

RDG:is

Enclosure

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9/13

Charlie:

Please let me know what
you do with this, so that
I can take care of the
mail control.

Pat

Send to Elvira-Mur
Assign to Team #3

26: Send memorandum
letter to CFIPC
saying Commission is
examining circumstances,
will apprise of results.

Potlatch

RECEIVED
AND FILED
In the Office of the Secretary of State
of the State of California
NOV 22 1976

MURCH FONG EU, Secretary of State

Potlatch Corporation

One Mainline Plaza
P.O. Box 3591
San Francisco, California 94119
Telephone (415) 981-5950

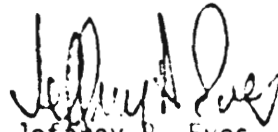
November 17, 1976

Secretary of State
Political Reform Division
P.O. Box 7457
Sacramento, CA 95807

To whom it may concern:

In accordance with relevant Fair Political Practices Commission guidelines concerning contributions made prior to an election but after the closing date of the last pre-election statement, the following information is transmitted:

Potlatch Corporation, which has filed a Major Donors Campaign Statement for the period January 7, 1976 through October 18, 1976, has on October 19, 1976, made a contribution in the amount of \$5,000.00 to the Northern California Democratic State Central Committee (ID #741666).



Jeffrey P. Eves
Manager
Government Relations

JPE/np

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MAJOR DONORS CAMPAIGN STATEMENT

The form should be filled out by the major donor, or the donor's authorized representative, and submitted to the Federal Election Commission, 1100 Pennsylvania Avenue, N.W., Washington, D.C. 20542, by the date of filing your statement with the Federal Election Commission.

(GOVERNMENT AND NON-GOVERNMENT CAMPAIGN ACT OF 1974)

Statement covers period 1/01/76 through 10/18/76

IDENTIFY CONTRIBUTOR

RECEIVED
NOV 19 1976

MAJOR
FEDERAL ELECTION COMMISSION
OFFICIAL USE ONLY
A
B

NAME OF CONTRIBUTOR (IND. AND OR CORP.)	CITY	STATE	ZIP CODE	AREA CODE	PHONE NO.
John P. Evans	San Francisco	California	94119	415/981-5980	
NAME OF CONTRIBUTOR (IND. AND OR CORP.)	CITY	STATE	ZIP CODE	AREA CODE	PHONE NO.
John P. Evans	San Francisco	California	94119	415/981-5980	
NAME OF CONTRIBUTOR (IND. AND OR CORP.)	CITY	STATE	ZIP CODE	AREA CODE	PHONE NO.
John P. Evans	San Francisco	California	94119	415/981-5980	

TREASURER (Complete this part only if major donor is an organization)

John P. Evans

NAME OF CONTRIBUTOR (IND. AND OR CORP.)	CITY	STATE	ZIP CODE	AREA CODE	PHONE NO.
John P. Evans	San Francisco	California	94119	415/981-5980	
NAME OF CONTRIBUTOR (IND. AND OR CORP.)	CITY	STATE	ZIP CODE	AREA CODE	PHONE NO.
John P. Evans	San Francisco	California	94119	415/981-5980	

CONTRIBUTIONS MADE TO: (Amounts may be rounded off to whole dollars)

DATE	NAME OF CANDIDATE AND OFFICE OR NAME OF COMMITTEE AND CITY, STATE, AND ZIP CODE	AMOUNT THIS PERIOD	CUMULATIVE AMOUNT
1/01/76	San Francisco Committee for City-County, #216-275	\$ 500.00	\$ 500.00
1/01/76	Presidential Luncheon Committee (State Committee), #744-320	2,500.00	2,500.00
2/01/76	California Chapter of Congress -		
3/01/76	218 Initiative Legal Defense Fund	150.00	150.00
3/01/76	Citizens for Jobs and Energy, #744-250	500.00	1,000.00
4/01/76	California for Yes on Proposition 13	500.00	1,500.00
7/01/76	State for California, #744-250	500.00	500.00
8/01/76	State to President and Congress, #744-250	5,000.00	5,000.00
9/01/76	California National Association of -		
10/01/76	Political Education Program, #744-250	1,000.00	1,000.00
	SUBTOTAL (Carry with additional subtotals to Line 1, Part V)	\$ 12,150.00	

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YOU MUST COMPLETE THE SUMMARY AND VERIFICATION ON PAGE 2

OFFICIAL FILE
COPY

LOANS MADE TO: (Amounts may be rounded off to whole dollars)

NAME OF CANDIDATE, COMMITTEE, OR NAME OF POLITICAL PARTY, ORGANIZATION, OR GROUP	INTEREST RATE	AMOUNT OF LOAN THIS PERIOD	CUMULATIVE AMOUNT
☐ Support ☐ Oppose			
☐ Support ☐ Oppose			
☐ Support ☐ Oppose			
☐ Support ☐ Oppose			
SUBTOTAL (Carry with additional subtotals to Line 2, Part V)	\$		

If the loan was made to a committee, list the committee's name and I.D. Number (or full name and street address of the treasurer)

IV LOANS REPAID BY: (Amounts may be rounded off to whole dollars)

FULL NAME AND ADDRESS OF DEBTOR (If the loan was made to a committee list the committee's name and I.D. Number. If the committee does not have an I.D. Number list the treasurer's full name and street address.)	AMOUNT REPAID THIS PERIOD	UNPAID BALANCE
SUBTOTAL (Carry with additional subtotals to Line 4, Part V)	\$	

V SUMMARY

1. CONTRIBUTIONS MADE THIS PERIOD (Part II)	\$ 12,150.00
2. LOANS MADE THIS PERIOD (Part III)	-0-
3. TOTAL (1 + 2)	\$ 12,150.00
4. LOANS REPAID THIS PERIOD (Part IV)	-0-
5. NET CONTRIBUTIONS MADE THIS PERIOD (Line 3-4, do not be a negative amount)	\$ 12,150.00
6. CUMULATIVE CONTRIBUTIONS MADE THIS PERIOD (Part I)	-0-
7. CUMULATIVE CONTRIBUTIONS MADE TO DATE (Part I, 5, 6)	\$ 12,150.00

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VERIFICATION

I have not reported any contributions from this period in any year.

I have not reported any contributions from this period in any year to candidates and committees for federal office.

I have not reported any contributions from this period in any year to any other person or organization.

I have not reported any contributions from this period in any year to any other person or organization.

I have not reported any contributions from this period in any year to any other person or organization.

For Political Practices Committee
at New York, N.Y.
Post Office Box 180
Sacramento, California 95833

BRAD TISHFIELD, Esq.
Office of the General Counsel
Federal Election Commission
1000 H Street, N.W.
Washington, D.C. 20463



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 453

