

BEFORE THE FEDERAL ELECTION COMMISSION

Federal Election Commission  
of the United States

v.

Udall For Us All Committee  
FEC ID Number C00329896

Attorney General Tom Udall

Jill Z. Cooper, Timothy L. Garcia

Jerome Kessler, Stuart Woods, Barrie Bergman, Marie Ridder, Arlene Bergman, Susan McGreevy, Helen Kornblum, Philip Smith, Suzanne Fisher, Susan Simons, Carl Sheppard, Yogi Bhajan, Allan Kurtzman, Winiford Carlile, Marsha Mason, William Kilgarin, Robert Mang, Philip Hertzman, Valerie Jean Fairchild, Robert Martinez, Stewart Udall, Rudolph Rasin, Lee Udall, Michael Rosenberg, Rosmaria Ellis Clark, Neil Rolde, John Clark, Michael Traynor, George E. Coleman, Dr. Edward Steinberg, Curtis Boyd, Jay Stein, L. Jane Schreiber, John D. Wirth, Jessica Catto, Joyce Melander-Dayton, Charles Zernach, Thomas Dee Frasier, Daniel Haft, Thomas Keesing, Edith Pierpont, Jacqueline Hoefler, Marjorie Miller Engel, Brook Gliefke, Donald Salazar, Marion Noel, Georgia Webster, Don Henley, Sharon Henley, New Democrat Network, Transport Political Education League, AFSCME PAC, DRIVE Political Fund, Wendy Rockefeller, IBEW-COPE, Lynn Udall, George Coleman, South Bay Voter Registration

This case is to  
be designated  
Matter Under  
Review # 11

Oct. 22, 1998

### COMPLAINT

The Republican Party of New Mexico, by and through its Chairman, John Dendahl, brings this complaint pursuant to 2 U.S.C. § 437g(a)(1). The Republican Party of New Mexico may be reached at 2901 Juan Tabo N.E., Suite 116, Albuquerque, NM 87112

#### I. SUMMARY

According to his own sworn disclosure reports, Attorney General Tom Udall is taking vast sums of illegal political contributions. First, Udall has unlawfully received 1,687 contributions (\$485,236.81) earmarked towards his primary election even though the primary election date passed 142 days prior. Federal law prohibits candidates from accepting contributions for prior elections except to cover net debts that remain outstanding. Udall had no such net debts outstanding. Second, Udall reports accepting a single contribution in the form of a loan or loan guarantee) up to 80 times the federal limit. The Commission should act swiftly and consistent with prior precedent to put a stop to Udall's malfeasance.

## **II. THE LAW**

### **1. "Primary" Contributions May Only Be Received On or Before Primary Day.**

Under the Federal Election Campaign Act (the "Act"), federal candidates can only accept contributions for elections in advance of those elections. 11 C.F.R. § 110.1(b)(3)(i) (attached). Contributions may not be applied towards a prior election unless the campaign has "net debts outstanding" from that prior election. *Id.* Undesignated contributions must count towards the next upcoming election. Attached please find the relevant pages from the FEC's Campaign Guide for Congressional Candidate's and Committees, a guide sent to all campaigns.

**2. A Campaign Can Only Receive Debt Retirement Contributions Equal to Its "Net Debts Outstanding."** A campaign has "net debts outstanding" for a primary election if it spent or borrowed more for the primary than it raised towards the primary. *Id.* If a campaign without net debts outstanding receives a contribution designated for the primary election after the primary, it must (i) refund the contribution or (ii) obtain written "redesignation" from the donor within 60 days. See MUR 3452 (Durant for US Senate fined \$22,000 for receiving excessive contributions and failing to redesignate them within 60 days); see also MUR 3403 (Geraldine Ferraro's campaign fined for failing to redesignate contributions within 60 days among other violations).

**3. Individual Contributors (Including Candidates' Spouses) Are Limited to Giving, Lending or Guaranteeing \$1,000 Per Candidate, Per Election.** Individuals can only contribute up to \$1,000 per election to any federal candidate. 2 U.S.C. § 441(a). The \$1,000 limitation of the Act applies to candidates' spouses and family members as well as other individuals. See FEC Advisory Opinion 1987-30 (holding that "family loans and payments on loans to retire campaign debts may not exceed contribution limits). The Act defines loans and loan guarantees as contributions subject to the \$1,000 limit. 2 U.S.C. § 431(b)(4)(1).

**4. Campaigns must disclose outstanding debt obligations.** 11 C.F.R. § 104.3(d).

## **III. FACTS & DISCUSSION**

### **A. UDALL'S UNLAWFUL POST-PRIMARY RECEIPTS**

**1. The New Mexico Primary Election Was Held on June 2, 1998.** Tom Udall was nominated for the general election to the United States Congress at the New Mexico Democratic Party's June 2, 1998 primary election. Udall's "Udall for Us All Committee" (FEC ID Number C00329896) properly designated all contributions received up to and on the 2<sup>nd</sup> of June towards the "primary" election cycle.

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2. **Udall Reported No Debts Outstanding from the "Primary."** According to his own public disclosure reports filed (under oath) with the Commission, Tom Udall had no "Debts and Obligations Owed by the Committee" from the primary election as of June 30. See Udall Mid-Year Disclosure Report, Line 10. If he had any outstanding obligations (other than loans), he was required to report them on a Schedule D Report disclosing the outstanding debts. If he had any outstanding loans, Udall was required to disclose them on a Schedule C Report. Udall filed neither a Schedule C nor a Schedule D report at mid-year.

Udall did disclose a loan from himself and Ms. Jill Cooper (his wife and assistant treasurer) for \$30,000 made prior to the primary election (on May 22, 1998). See Udall Mid-Year Disclosure Report, Line 13a Page. Assuming this pre-primary loan had not been repaid as of June 2, Udall's failure to disclose it on Line 10 and Schedule C constitutes basic violations of the public disclosure requirements of the Act, which must be remedied through prompt amendments.

3. **Udall Could Only Accept Contributions for the "General" Starting June 3.** After the June 2 primary, the next election at which Udall would appear was the November 3, 1998 general election. As has been stated, Udall reported no net debts outstanding from the primary election. If he in fact had debts, his failure to report them constitutes a violation of 11 C.F.R. §104.3(d). With no net debts to retire, Udall could only receive contributions designated towards the general election starting June 3. 11 C.F.R. § 110.1(b)(3)(6).

Assuming Udall and Ms. Cooper's pre-primary loan had not been repaid as of June 2 and that Udall's disclosure was indeed deficient in reporting no outstanding debts - Udall could have received up to \$30,000 in "primary" debt retirement contributions after June 2. Udall could not lawfully receive 16 times that amount - as he reports having done - unless he failed to disclose over \$450,000 in outstanding primary debts on his June 30 report.

4. **Udall Unlawfully Accepted \$485,236.81 for the "Primary" Between June 3 and September 30.** From June 10 through at least September 30, Udall for U.S. All improperly unlawfully accepted 1,687 separate contributions which were - according to Udall's own reports filed under oath -- designated for the "primary" election. See Schedule A of Udall's Mid-Year, October 15, and Pre-General FEC Reports. These contributions total \$485,236.81.

**Clearly Udall's reporting of these contributions as receipts designated to the "primary" was intentional** - they could not have resulted from "computer default error" or "inadvertent bookkeeping glitches" for several reasons. First, the contributions in question span five months and three separate disclosure reports. Second, it seems inconceivable that Mr. Udall could make the same error 1,687 separate times. Next, Udall identified other receipts on the same disclosure reports as "general" election contributions (and thus recognized a difference between "primary" and "general"). Fourth, the Udall Committee demonstrated knowledge of the June 2 cut-off date on its Mid-Year report which Mr. Garcia signed as treasurer. And finally, where donors gave more than \$1,000 after the June 3

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primary election, their excessive contributions were divided between "primary" and "general" designations, again demonstrating an understanding of some distinction.

**5. Udall Can Only Redesignate Contributions Received on August 22 or Later.**

Where campaigns without net debts outstanding receive contributions for the "primary" after the primary election day, they must refund the contributions or obtain written "redesignation" from the donors within 60 days. 11 C.F.R. § 110.1(b)(3)(i). In the past the Commission has been very strict in enforcing this 60 day rule, fining committees that kept contributions that could not be redesignated within 60 days. See MUR 3452 (Durant for US Senate fined \$22,000 for receiving excessive contributions and failing to redesignate them within 60 days; see also MUR 3803 (Geraldine Ferraro's campaign fined for failing to redesignate contributions within 60 days among other violations).

**6. Udall Must Immediately Return \$198,684.** Of the \$485,236.81 received post primary that Udall reports as designated to the "primary," **\$198,684 must be refunded immediately** because it cannot be redesignated within 60 days. It is too late for Mr. Udall to obtain redesignation permission from the donors for these contributions because they are more than 60 days stale, and Udall cannot unilaterally redesignate "primary" donations to the "general" election.

**7. Udall Must Return At Least \$24,050 More Because It Exceeds the Contribution Limits of the Act.** Even if the contributions were not designated by donors to the "primary" election - and Udall's three reports, filed under oath, contain 1,687 false or inaccurate statements - he is still subject to the contribution limitations of the Act. Individual donors are limited to contributions of \$1,000 per election, and multicandidate PACs are limited to \$5,000. 2 U.S.C. § 441a(a). Because undesignated contributions made June 3 and after must be applied to the "general," individuals who contributed more than \$1,000 to Udall after June 2 exceeded the contribution limits of the Act. These individuals and PACs include:

<b>DONOR</b>	<b><u>"Primary"-Designated</u></b>	<b><u>"General"-Designated</u></b>
Jacqueline Hofer	\$1,000 on 7/21/98	\$1,000 on 7/21/98
AFSCME	\$5,000 on 8/20/98	\$5,000 on 8/20/98
Brook Glaefke	\$1,000 on 8/31/98	\$1,000 on 8/31/98
DRIVE (Teamsters)	\$5,000 on 9/4/98	\$5,000 on 9/12/98
Marion Noel	\$1,000 on 9/17/98	\$1,000 on 9/17/98
Don Henley	\$1,000 on 9/24/98	\$1,000 on 9/24/98
Sharon Henley	\$1,000 on 9/24/98	\$1,000 on 9/24/98
Wendy Rockefeller	\$1,000 on 10/2/98	\$1,000 on 10/2/98
Lynn Udall	\$550 on 10/4/98	\$1,000 on 10/4/98
I.B.E.W. Union		\$2,500 on 6/30/98 \$5,000 on 9/17/98
George E. Coleman	\$500 on 3/24/98 \$500 on 10/13/98 \$1,000 on 7/10/98	

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It is difficult to determine the full extent of these excessive contributions because the Udall Committee ceased listing its donors in alphabetical order when Mr. Garcia stopped signing the reports. The Commission should cross match all donors to determine the full extent of excessive contributions received by Udall after June 2.

Udall also reports receipt of \$5,000 from the South Bay Voter Registration on September 23, 1998. This organization is not registered with the Federal Election Commission as a multicandidate PAC, however, and is therefore limited to contributions of no more than \$1,000 per election (of federally-permissible funds only). Udall must further refund \$4,000 to this outfit.

**B. UDALL'S UNLAWFUL LOAN**

1. **Udall Received Up To \$80,000 in Loans or Loan Guarantees from Jill Cooper.** On his mid-year report, Udall reports a \$30,000 loan to his campaign from "Tom Udall and Jill Cooper" made on May 22, 1998. *See Udall Mid-Year Report, Line 13a.* On his October Quarterly filing, Udall lists a second loan from "Tom Udall and Jill Cooper" for \$50,000 more made on September 15, 1998. *See Udall October 15 Report, Line 13a.* Udall reports repaying himself and Ms. Cooper \$15,000 in August and September.

2. **Candidates Do Not Report Loans from Individuals Who Do Not Make or Guarantee Them.** Udall and Ms. Cooper chose to report Ms. Cooper as a joint source of the \$80,000 loans - she signed the report and he is responsible for it. If the loans came exclusively from his separate funds, then his mid-year and October quarterly filings are false, fraudulent and inaccurate by invoking her name on four separate occasions where it did not belong.

3. **Jill Cooper's Loans or Loan Guarantees Exceed Federal Limits.** Federal law limits individuals to contributions of \$1,000 per election. 2 U.S.C. § 441a(a). Contribution limits likewise apply to loans and loan guarantees. 2 U.S.C. § 431(8)(a)(1). Ms. Cooper's apparent loans or loan guarantees exceed federal limits by up to 80 times.

**IV. PRAYER FOR RELIEF**

The law is clear. The facts are based upon Udall's own reports (signed by Ms. Cooper and submitted under oath. And Udall's unlawful campaign finance schemes clearly violate federal law. If Udall is ignorant of the law that is no excuse. If he instead chooses to ignore the law his behavior provides a dangerous example of leadership for the top law enforcement officer in the state. At a minimum, Mr. Udall must be held to the same standards as every other federal candidate.

While Udall should not be allowed to benefit from his blatantly unlawful fund-raising tactics, he is clearly financing the last two weeks of his campaign with these ill gotten-gains. The Commission should take the promptness with which he makes appropriate refunds and redesignations into account when meting out punishment. Swift and appropriate actions are clearly needed here to deter future violations of the law by Udall's campaign, particularly knowing and willful transgressions.

Respectfully Submitted.



John Dendahi  
Chairman

District of Columbia

Signed and sworn to before me  
this 22<sup>nd</sup> day of October, 1998.



NOTARY PUBLIC

My commission expires: \_\_\_\_\_

**REPORT OF RECEIPTS AND DISBURSEMENTS**For An Authorized Committee  
(Summary Page)

1. NAME OF COMMITTEE (in full)

United for Us All

RECEIVED  
FEDERAL ELECTION  
COMMISSION MAIL ROOM

NM/03

ADDRESS (number and street)

P.O. Box 208

☐ Check if different than previously reported.2. FILING DATE  
06/28/98

CITY, STATE and ZIP CODE

Santa Fe, NM 87504

STATE/DISTRICT

3. IS THIS REPORT AN AMENDMENT?

☐ YES☒ NO**4. TYPE OF REPORT**☐ April 15 Quarterly Report☐ Twelfth day report preceding

the date of

☒ July 15 Quarterly Report

election on \_\_\_\_\_ in the State of \_\_\_\_\_

☐ October 15 Quarterly Report☐ Thirtieth day report following the General Election on☐ January 31 Year End Report

in the State of \_\_\_\_\_

☐ July 31 Mid-Year Report (Non-election Year Only)☐ Termination ReportThis report contains  
activity for☐ Primary Election☒ General Election☐ Special Election☐ Recall Election**SUMMARY**

5. Covering Period	04/01/98	through	06/30/98	COLUMN A This Period	COLUMN B Calendar Year-to-date
6. Net Contributions (other than loans)					
(a) Total Contributions (other than loans) (from Line 11(e))				\$180317.15	\$242871.40
(b) Total Contribution Refunds (From Line 20(f))				\$0.00	\$0.00
(c) Net Contributions (other than loans) (subtract Line 6(b) from 6(a))				\$180317.15	\$242871.40
7. Net Operating Expenditures					
(a) Total Operating Expenditures (from Line 17)				\$384541.00	\$435455.52
(b) Total Offsets to Operating Expenditures (from Line 14)				\$0.00	\$0.00
(c) Net Operating Expenditures (Subtract Line 7(b) from 7(a))				\$384541.00	\$435455.52
8. Cash on Hand at (Close of Reporting Period (from Line 27))				\$33100.00	
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)				\$0.00	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)				\$0.00	

For further information:  
Federal Election Commission  
441 E Street, NW  
Washington, DC 20543  
Toll Free 1-800-426-9750  
Local 202-725-3700

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

Signature of Treasurer

Timothy L. Garcia  
Linda L. Lewis

Date

7/15/98

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to penalties of 2 U.S.C. 1995a.

FEC FORM 28  
(Revised 4/97)

NAME OF COMMITTEE (In Full)		NAME OF EMPLOYER	DATE RECEIVED (day, year)	AMOUNT OF RECEIPT THIS PERIOD
Udall for US 221		State of New Mexico	05/22/98	\$36000.00
Full Name, mailing address and zip code Tom Udall and Jill Cooper P.O. Box 1861 Santa Fe, NM 87504-		Occupation Attorney General	Aggregate Year-to-Date --> \$36000.00	
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)				
Full Name, mailing address and zip code		NAME OF EMPLOYER Occupation	DATE RECEIVED (day, year) / /	AMOUNT OF RECEIPT THIS PERIOD
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		Aggregate Year-to-Date -->		
Full Name, mailing address and zip code		NAME OF EMPLOYER Occupation	DATE RECEIVED (day, year) / /	AMOUNT OF RECEIPT THIS PERIOD
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		Aggregate Year-to-Date -->		
Full Name, mailing address and zip code		NAME OF EMPLOYER Occupation	DATE RECEIVED (day, year) / /	AMOUNT OF RECEIPT THIS PERIOD
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		Aggregate Year-to-Date -->		
Full Name, mailing address and zip code		NAME OF EMPLOYER Occupation	DATE RECEIVED (day, year) / /	AMOUNT OF RECEIPT THIS PERIOD
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		Aggregate Year-to-Date -->		
Full Name, mailing address and zip code		NAME OF EMPLOYER Occupation	DATE RECEIVED (day, year) / /	AMOUNT OF RECEIPT THIS PERIOD
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		Aggregate Year-to-Date -->		
Full Name, mailing address and zip code		NAME OF EMPLOYER Occupation	DATE RECEIVED (day, year) / /	AMOUNT OF RECEIPT THIS PERIOD
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		Aggregate Year-to-Date -->		
Full Name, mailing address and zip code		NAME OF EMPLOYER Occupation	DATE RECEIVED (day, year) / /	AMOUNT OF RECEIPT THIS PERIOD
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		Aggregate Year-to-Date -->		
<b>SUBTOTAL of Receipts This Page (optional)</b>				<b>\$36000.00</b>
<b>TOTAL This Period (last page this line number only)</b>				<b>\$36000.00</b>



## SCHEDULE A

## ITEMIZED RECEIPTS

Aggregate of individual and category of the Detailed Summary Page	PAGE	OF
	21	1
	FOR LINE NUMBER	
13a		

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)

Udall for Hs. A.]

## Full Name, Mailing Address and Zip Code

Tom Udall and Jill Cooper  
P.O. Box 1881

Santa Fe, NM 87504-

Receipt For: ☒ Primary ☐ General☐ Other (specify)

## Name of Employer

State of New Mexico

## Occupation

Attorney General

## Date (month, day, year)

09/15/98

## Amount of Each Receipt This Period

\$30000.00

## Aggregate Year-to-Date -&gt;

\$30000.00

## Full Name, Mailing Address and Zip Code

Receipt For: ☐ Primary ☐ General☐ Other (specify)

## Name of Employer

## Occupation

## Date (month, day, year)

/ /

## Amount of Each Receipt This Period

Period

## Aggregate Year-to-Date -&gt;

## Full Name, Mailing Address and Zip Code

Receipt For: ☐ Primary ☐ General☐ Other (specify)

## Name of Employer

## Occupation

## Date (month, day, year)

/ /

## Amount of Each Receipt This Period

Period

## Aggregate Year-to-Date -&gt;

## Full Name, Mailing Address and Zip Code

Receipt For: ☐ Primary ☐ General☐ Other (specify)

## Name of Employer

## Occupation

## Date (month, day, year)

/ /

## Amount of Each Receipt This Period

Period

## Aggregate Year-to-Date -&gt;

## Full Name, Mailing Address and Zip Code

Receipt For: ☐ Primary ☐ General☐ Other (specify)

## Name of Employer

## Occupation

## Date (month, day, year)

/ /

## Amount of Each Receipt This Period

Period

## Aggregate Year-to-Date -&gt;

## Full Name, Mailing Address and Zip Code

Receipt For: ☐ Primary ☐ General☐ Other (specify)

## Name of Employer

## Occupation

## Date (month, day, year)

/ /

## Amount of Each Receipt This Period

Period

## Aggregate Year-to-Date -&gt;

## Full Name, Mailing Address and Zip Code

Receipt For: ☐ Primary ☐ General☐ Other (specify)

## Name of Employer

## Occupation

## Date (month, day, year)

/ /

## Amount of Each Receipt This Period

Period

## Aggregate Year-to-Date -&gt;

SUBTOTAL of Receipts This Page (optional)

\$30000.00

TOTAL This Period (last page this line number only)

\$30000.00

## AO 1987-30

*Family loans and payments on loans to retire campaign debts may not exceed contribution limits.*

May 16, 1988

*(This opinion was originally issued December 3, 1987, but was vacated and modified on May 11, 1988, pursuant to a request for reconsideration. The opinion as issued this date is identical to the original opinion except for the second and third paragraphs.)*

This responds to your letters of July 28 and October 1, 1987, requesting an advisory opinion on behalf of the Ripley for Senate Committee concerning application of the Federal Election Campaign Act of 1971, as amended ("the Act"), to contributions by a co-signer of a loan to the Ripley campaign.

You state that Robert K. Ripley, a 1984 candidate for the United States Senate from Montana, and his wife, Martha Ripley, co-signed a loan note with the Bank of Columbia Falls in May 1983. This note was later cancelled, you explain, and a new note was substituted with only Mr. Ripley's signature. Mr. Ripley later negotiated and signed, by himself only, two additional notes payable to the Bank of Columbia Falls. The proceeds of these loans were used in Mr. Ripley's unsuccessful campaign for the Democratic nomination in the 1984 Senate primary election. All three loans were eventually consolidated on August 16, 1984, into a single note for \$188,400. As partial collateral for this note, Mr. Ripley posted real estate properties in Virginia and Montana. Because these properties were held in joint tenancy, the Bank also required Mrs. Ripley to sign the note.

In April of 1986, the Virginia property was sold with only Mr. Ripley's share of sale proceeds applied to the loan repayment. A new note was negotiated in May 1986 for \$132,675, secured by the remaining Montana property. Mrs. Ripley again was required to sign the note. The Bank of Columbia Falls thereafter failed and the Federal Deposit Insurance Corporation ("FDIC") assumed the Ripley note. The FDIC is attempting to collect on the note. You state that Mr. Ripley does not have the personal assets to cover the note and that the FDIC is demanding that Mrs. Ripley's assets be combined with those of Mr. Ripley to satisfy the obligation. You ask whether Mrs. Ripley may contribute her assets to satisfy the loan obligation in an amount that exceeds the contribution limits of the Act.

As a preliminary matter, the Commission notes that this opinion will only address the issue of whether Mrs. Ripley may contribute her assets to pay on the loan without exceeding the limits of the Act. This opinion does not address the original loan transactions because any issues raised by those transactions relate only to past conduct, rather than to prospective conduct. The advisory opinion process contemplates future transactions, or activity that is already underway and may continue in the future. 11 CFR 112.1(b).

Any person, including the wife or family member of a candidate, may contribute an aggregate of \$1,000 per election to a Federal candidate. U.S.C. § 6412(a)(1)(A); 11 CFR 112.1(b)(1). The term "contribution" includes "any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for Federal office." U.S.C. § 631(b)(1)(A). The regulations indicate that a loan guarantee, endorsement, or other form of loan security is a contribution at the time made whether or not the loan is repaid. 11 CFR 112.1(b)(1). See also 11 CFR 100.7(a)(1)(i)(D), and 100.7(a)(1)(i). In Advisory Opinion 1981-8 the Commission concluded that the co-signer of a bank loan, which was obtained to retire outstanding campaign debts, "would be a contributor and thus would be bound to agree to a limit of up to \$1,000, ensuring that person has not used any of his or her contribution limit" with respect to the candidate's campaign.

Where a Federal election campaign results in outstanding debts and obligations, Commission regulations provide that contributions to retire those debts are subject to the contribution limits. 11 CFR 112.1(g). Several advisory opinions issued since 1983 have applied and reiterated this long-standing rule. Advisory Opinions 1985-2, 1984-60, 1987-2, 1987-22, and 1979-1. The contribution limits also apply regardless of whether the contributor is a member of the candidate's family. Advisory Opinions 1984-48 and 1987-13. Accordingly, Mrs. Ripley may not contribute an amount of \$1,000 to her husband's 1984 Senate campaign; then later apply to contributions made before and after the 1984 Senate primary election. Assuming Mrs. Ripley has not made another contribution to the Ripley campaign, she may contribute \$1,000 to satisfy the loan obligation.<sup>1</sup> Any additional contributions would exceed the limits of the Act. U.S.C. § 6412(a)(1)(A).

This opinion expresses no view as to Mrs. Ripley's obligations under State law with respect to the loan. These issues are outside the purview of the Act. Advisory Opinions 1981-60 and 1979-1. In addition, the Commission expresses no opinion as to whether a contribution would result if Mrs. Ripley is held personally liable on the loan by court judgment and then makes payments to satisfy that judgment. See Advisory Opinion 1971-1.

<sup>1</sup> As indicated above, the Commission does not in this opinion express its opinion on whether Mrs. Ripley did or did not make a contribution when she signed any loan document, including when payable to the Bank of Columbia Falls, in connection with these loans.

<sup>2</sup> In *PEC v. Ripley for Campaign Committee*, 658 F. Supp. 1129 (W.D. Va. 1987), the district court, however, held that it was premature after the election to set aside the debt for the purpose of influencing a Federal election. The Commission has filed an appeal in this case with the United States Court of Appeals for the 4th Circuit.

**FEDERAL ELECTION  
CAMPAIGN LAWS**

Compiled by

**THE  
FEDERAL  
ELECTION  
COMMISSION**



**JUNE 1994**

her duties as a holder of Federal office, may be contributed to any organization described in section 170(c) of title 26, or may be used for any other lawful purpose, including transfers without limitation to any national, State, or local committee of any political party; except that no such amounts may be converted by any person to any personal use, other than to defray any ordinary and necessary expenses incurred in connection with his or her duties as a holder of Federal office.

**§439b. Repealed.**

**§439c. Authorization of appropriations**

NOTE: This section contains the authorization for FEC appropriations for FY 1975 through FY 1978, and for FY 1981. While contained in the United States Code, this provision has no substantive election law content.

**§440. Repealed.**

**§441. Repealed.**

**§441a. Limitations on contributions and expenditures**

**(a) Dollar limits on contributions.**

**(1) No person shall make contributions—**

(A) to any candidate and his authorized political committees with respect to any election for Federal office which, in the aggregate, exceed \$1,000;

(B) to the political committees established and maintained by a national political party, which are not the authorized political committees of any candidate, in any calendar year which, in the aggregate, exceed \$20,000; or

(C) to any other political committee in any calendar year which, in the aggregate, exceed \$5,000.

**(2) No multicandidate political committee shall make contributions—**

(A) to any candidate and his authorized political committees with respect to any election for Federal office which, in the aggregate, exceed \$5,000;

(B) to the political committees established and maintained by a national political party, which are not the authorized political committees of any candidate, in any calendar year, which, in the aggregate, exceed \$15,000; or

# Code of Federal Regulations

**Federal Elections**

**11**

**Revised as of January 1, 1998**

**CONTAINING  
A CODIFICATION OF DOCUMENTS  
OF GENERAL APPLICABILITY  
AND FUTURE EFFECT**

**AS OF JANUARY 1, 1998**

*With Ancillaries*

Published by  
the Office of the Federal Register  
National Archives and Records  
Administration

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- 110.6 Earmarked contributions (2 U.S.C. 441a(a)(8)).
- 110.7 Party committee expenditure limitations (2 U.S.C. 441a(d)).
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- 110.9 Miscellaneous provisions.
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- 110.12 Candidate appearances on public educational institution premises.
- 110.13 Candidate debates.
- 110.14 Contributions to and expenditures by delegates and delegate committees.

**AUTHORITY:** 2 U.S.C. 431(8), 431(9), 432(c)(2), 437d(a)(8), 438(a)(8), 441a, 441b, 441d, 441e, 441f, 441g and 441h.

**§ 110.1 Contributions by persons other than multicandidate political committees (2 U.S.C. 441a(a)(1)).**

(a) *Scope.* This section applies to all contributions made by any person as defined in 11 CFR 100.10, except multicandidate political committees as defined in 11 CFR 100.5(e)(3) or entities and individuals prohibited from making contributions under 11 CFR 110.4 and 11 CFR parts 114 and 115.

(b) *Contributions to candidates; designations; and redesignations.*

(1) No person shall make contributions to any candidate, his or her authorized political committees or agents with respect to any election for Federal office which, in the aggregate, exceed \$1,000.

(2) For purposes of this section, *with respect to any election* means—

(i) In the case of a contribution designated in writing by the contributor for a particular election, the election so designated. Contributors to candidates are encouraged to designate their contributions in writing for particular elections. See 11 CFR 110.1(b)(4).

(ii) In the case of a contribution not designated in writing by the contributor for a particular election, the next election for that Federal office after the contribution is made.

(3)(i) A contribution designated in writing for a particular election, but made after that election, shall be made only to the extent that the contribution does not exceed net debts outstanding from such election. To the extent that such contribution exceeds net debts outstanding, the candidate or the candidate's authorized political com-

mittee shall return or deposit the contribution within ten days from the date of the treasurer's receipt of the contribution as provided by 11 CFR 103.3(a), and if deposited, then within sixty days from the date of the treasurer's receipt the treasurer shall take the following action, as appropriate:

(A) Refund the contribution using a committee check or draft; or

(B) Obtain a written redesignation by the contributor for another election in accordance with 11 CFR 110.1(b)(5); or

(C) Obtain a written reattribution to another contributor in accordance with 11 CFR 110.1(k)(3).

If the candidate is not a candidate in the general election, all contributions made for the general election shall be either returned or refunded to the contributors or redesignated in accordance with 11 CFR 110.1(b)(5), or reattributed in accordance with 11 CFR 110.1(k)(3), as appropriate.

(ii) In order to determine whether there are net debts outstanding from a particular election, the treasurer of the candidate's authorized political committee shall calculate net debts outstanding as of the date of the election. For purposes of this section, net debts outstanding means the total amount of unpaid debts and obligations incurred with respect to an election, including the estimated cost of raising funds to liquidate debts incurred with respect to the election and, if the candidate's authorized committee terminates or if the candidate will not be a candidate for the next election, estimated necessary costs associated with termination of political activity, such as the costs of complying with the post-election requirements of the Act and other necessary administrative costs associated with winding down the campaign, including office space rental, staff salaries and office supplies, less the sum of:

(A) The total cash on hand available to pay those debts and obligations, including: currency; balances on deposit in banks, savings and loan institutions, and other depository institutions; traveler's checks; certificates of deposit; treasury bills; and any other committee investments valued at fair market value; and

(B) The total amounts owed to the candidate or political committee in the

December

Federal Election Commission

1333

# CAMPAIGN GUIDE



FOR CONGRESSIONAL  
CANDIDATES AND  
COMMITTEES

## 4. Designated and Undesignated Contributions

The Commission strongly recommends that campaigns encourage contributors to designate their contributions. Contributors designate contributions by indicating in writing the specific election to which they intend a contribution to apply. 110.1(b)(2)(i). Contributors may make this written designation on the check (or other written instrument) or in a signed statement accompanying the contribution. 110.1(b)(4). The contribution then counts against the donor's limit for the designated election.

An undesignated contribution, on the other hand, automatically counts against the limit for the candidate's upcoming election. 110.1(b)(2)(ii).

Designated contributions ensure that the contributor's intent is conveyed to the candidate's campaign. In the case of contributions from political committees, written designations also promote consistency in reporting and thereby avoid the possible appearance of excessive contributions on reports.

### Undesignated Contributions

As noted above, unless a contribution is designated by the contributor, it automatically applies to the candidate's upcoming election. An undesignated contribution made<sup>5</sup> after the candidate has won the primary but before the general election applies toward the contribution limit for the general. In the case of a candidate who has lost the primary, an undesignated contribution made after the primary election automatically applies toward the limit for the next election in which the candidate runs for federal office. If the candidate does not plan to run for federal office in the future, the contribution must be returned or refunded unless the contributor redesignates the contribution (in writing) to retire primary debts or the debts of an election that took place in a previous election cycle.<sup>6</sup> 102.9(e); 110.1(b)(2)(ii) and (b)(3).

### Designated Contributions

Only the contributor—not the recipient candidate's campaign—may designate a contribution for a particular election. A campaign that wishes to solicit designated contributions may supply contributors with a form that clearly states the election to which the contribution will be applied. The contributor, however, must sign the form

and return it to the committee along with the contribution.<sup>7</sup> 110.1(b)(2)(i) and (b)(4).

Because an undesignated contribution automatically applies to the candidate's next election, a written designation is necessary if a contributor wishes a contribution to apply to some other election. For example, a political committee may want its contribution to count toward a candidate's general election limit, even though the primary has not yet taken place. In that case, the donor committee must designate the contribution for the general election; an undesignated contribution would automatically apply toward the primary limit. As another example, if an individual wishes to help retire campaign debts of a past election, the donor must designate the contribution for that election.

Note that a campaign must retain copies of contribution designations for three years. If the designation appears on the check (or other written instrument), the campaign must retain a full-size photocopy. 102.9(c) and (f); 110.1(f)(1).

## 5. Contributions to Retire Debts

If debts remain after an election is over, a campaign may accept contributions after the election to retire debts provided that:

- The contribution is designated for that election (since an undesignated contribution made after an election counts toward the limit for the candidate's upcoming election);
- The contribution does not exceed the contributor's limit for the designated election; and
- The campaign has net debts outstanding for the designated election on the day it receives the contribution.

110.1(b)(3)(i) and (ii). See also pages 9 and 33.

### How to Calculate Net Debts Outstanding

A campaign's net debts outstanding consist of unpaid debts incurred with respect to the election minus cash on hand.

- Unpaid debts include the following:
- All outstanding debts and obligations;
  - The estimated cost of raising funds to liquidate the debts; and
  - If the campaign is terminating, estimated winding down costs (for example, office rental, staff salaries, office supplies).
- 110.1(b)(3)(ii).

Cash on hand consists of the resources available to pay the campaign's

total debts, including currency, deposited funds, traveler's checks, certificates of deposit, treasury bills and any other investments valued at fair market value. Additionally, the cash-on-hand total includes amounts owed to the campaign in the form of credits, refunds of deposits, returns and receivables or a commercially reasonable estimate of the collectible amount. 110.1(b)(1)(ii)(A) and (B).

### Adjustment to Net Debts Total

A campaign first calculates its net debts outstanding as of the day of the election. Thereafter, the campaign continually adjusts its total net debts outstanding as additional funds are received and spent. 110.1(b)(3)(ii) and (iii).

### Contributions Exceeding Net Debts

If, on the same day, a campaign receives several contributions that, together, exceed the amount needed to retire its debts, the campaign may:

- Accept a proportionate amount of each contribution and either refund the remaining amount or ask contributors to redesignate the excessive portions for another election; or
- Accept some contributions in full and either return or refund the others or seek redesignations for them.<sup>8</sup>

(Redesignations are explained later in this chapter.)

## 6. Date Contribution Is Made vs. Date of Receipt

The date a contribution is made by the contributor and the date the contribution is received by the campaign are significant for purposes of the contribution limits. It is important to understand the distinction.

5. See Section 6 for an explanation of when a contribution is "made."

6. The contributor may both redesignate the contribution and contribute a portion to a joint contributor. Redesignations and contributions are discussed on page 9.

7. See the Explanation and Justification published with the final rule, 52 Fed. Reg. 762, 763 (January 9, 1987).

8. See the Explanation and Justification published with the final rule, 52 Fed. Reg. 762, 763 (January 9, 1987).



The date of receipt is the date the campaign (or campaign agent) actually receives the contribution. This is the date used by the campaign for reporting purposes, but it also affects the application of the *net debts outstanding rule* (discussed above).

The date a contribution is made is the date the contributor relinquishes control over it.

- A hand-delivered contribution is considered made on the date it is delivered to the campaign.
- A mailed contribution is made on the date of the postmark.<sup>9</sup>
- An in-kind contribution is made on the date that the goods and services are provided by the contributor. 110.1(b)(6).

## Effect of Dates on Undesignated Contributions

The date an undesignated contribution is made determines which election limit it counts against, while the date of receipt does not affect the application of the contribution limits. An undesignated contribution made on or before election day counts against the donor's limit for that election, even if the date of receipt is after election day and even if the campaign has no net debts outstanding. On the other hand, an undesignated contribution made after an election counts against the donor's limit for the candidate's next election. 110.1(b)(2)(ii).

## Effect of Dates on Designated Contributions

Both the date of receipt and the date a contribution is made affect the application of the *net debts outstanding rule* to a designated contribution. The date the contribution is made determines whether the rule will apply, while the date of receipt governs whether the contribution is acceptable under the rule. For example, a contribution designated for the primary and made before that election will not be subject to the *net debts outstanding rule*, even if the campaign receives the contribution after the primary. By contrast, a contribution designated for—but made after—the primary is acceptable only to the extent the campaign has net debts outstanding for the primary on the date of receipt. 110.1(b)(3)(i) and (iii).

9. Note that if a campaign wishes to rely on a postmark as evidence of the date a contribution was made, it must retain the envelope or a copy of it. 110.1(f)(4).

## 7. Joint Contributions

A *joint contribution* is a contribution that is made by more than one person using a single check or other written instrument. For example, a husband and wife may each make a contribution using one check drawn on a joint account. When making a joint contribution, each contributor must sign the check (or other written instrument) or a statement that accompanies the contribution. (Contributions from partnerships are an exception to this rule; see Appendix D.) If the check or statement does not indicate how much should be attributed to each donor, the recipient committee must attribute the contribution in equal portions. 110.1(k)(1) and (2). For example, if a committee receives a \$1,000 joint contribution signed by two individuals but with no written attribution, the committee must attribute a \$500 contribution to each donor.

A campaign may request that a contribution be reattributed, as explained below.

## 8. Remediating an Excessive Contribution

When a committee receives an excessive contribution—one which exceeds the donor's limit or the campaign's *net debts outstanding* for an election—the committee may remedy the violation by refunding the excessive amount or by seeking a *redesignation* or *retribution* of it, as explained below.

Note, however, that the committee must inform the contributor that he or she may request a refund of the excessive amount as an alternative to providing a written redesignation or retribution. Also note that a committee may request that a contributor both redesignate and retribute an excessive contribution.

Step-by-step procedures for obtaining a retribution or redesignation are explained on page 10.

### Redesignation

With a redesignation, the contributor instructs the committee to use the excessive portion of a contribution for an election other than the one for which the funds were originally given. For example, the contributor may redesignate the excessive portion of a contribution made for the primary election so that it counts against his or her limit with respect to the general (provided the contributor has not

already contributed the maximum for the general election).

When requesting a redesignation, the committee must inform the contributor that he or she may, alternatively, request a refund of the excessive amount. 110.1(b)(5).

### Retribution

With a retribution, the contributor instructs the committee to attribute the excessive portion of a joint contribution to another individual. For example, if the committee receives an excessive contribution drawn on a joint checking account, but signed by only one account holder, the committee may seek a signed retribution of the excessive amount to the other account holder. 110.1(k)(3)(i). (A joint contribution may also be retributed so that a different amount is attributed to each donor.<sup>10</sup>) Note that a joint contribution must represent the personal funds of each donor because contributions made in the name of another are prohibited. 110.4(b).

When requesting retributions, the committee must also inform contributors that they may, alternatively, ask for a refund of the excessive portions of their contributions. 110.1(b)(5).

### When to Request Redesignations and Retributions

A committee may ask a contributor to redesignate and/or retribute a contribution, for example, when the committee receives:

- A designated or undesignated contribution that exceeds the donor's limit. 110.1(b)(3)(i)(A) and (C).
- A designated (or undesignated) contribution for an election in which the candidate is not running. For example, a contribution that was designated for the general but was received before the primary may be redesignated for a future primary if the candidate loses the primary or otherwise does not run in the general election. 102.9(a); see also AOs 1992-15 and 1995-17.
- A contribution which is designated for, but made after, an election and which exceeds the campaign's *net debts outstanding* for that election. 110.1(b)(3)(ii) and (5)(i)(B).
- An undesignated contribution which automatically applies to the candidate's upcoming election but which the committee wants to use to retire debts of a previous election. 110.1(b)(5)(D).

10. See the *Explanation and Justification* published with the final rule, 52 Fed. Reg. 760, 765-766 (January 9, 1987).

## SCHEDULE A

## ITEMIZED RECEIPTS

(separate schedule) each category of the Detailed Summary Page	PAGE	OF
	501	93
	FOR LINE NUMBER	
11(a) (1)		

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 CONTRIBUTOR (In Full)

Udall for Us All

Full Name, Mailing Address and Zip Code Jacqueline Hoefer 600 Camino Rancheros Santa Fe, NM 87501- Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	Name of Employer information requested Date (month, day, year) 07/21/98 Amount of Each Receipt this Period \$1000.00
Full Name, Mailing Address and Zip Code Jacqueline Hoefer 600 Camino Rancheros Santa Fe, NM 87501- Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Occupation information requested Aggregate Year-to-Date -> \$1000.00
Full Name, Mailing Address and Zip Code Jacqueline Hoefer 600 Camino Rancheros Santa Fe, NM 87501- Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Name of Employer information requested Date (month, day, year) 07/21/98 Amount of Each Receipt this Period \$1000.00
Full Name, Mailing Address and Zip Code Jacqueline Rudisch HC 75 Box 273 Lamy, NM 87540- Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Occupation information requested Aggregate Year-to-Date -> \$2000.00
Full Name, Mailing Address and Zip Code Eugene Wolkoff 700 Camino del Monte Sol Santa Fe, NM 87501- Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Name of Employer self Date (month, day, year) 07/22/98 Amount of Each Receipt this Period \$1000.00
Full Name, Mailing Address and Zip Code Eugene Wolkoff 700 Camino del Monte Sol Santa Fe, NM 87501- Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Occupation manufacturing Aggregate Year-to-Date -> \$1000.00
Full Name, Mailing Address and Zip Code Russell Moore PO Drawer AA Albuquerque, NM 87103- Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Name of Employer Callahan & Wolkoff, P.C. Date (month, day, year) 07/23/98 Amount of Each Receipt this Period \$500.00
Full Name, Mailing Address and Zip Code M. Thomas Wilson PO Box 6743 Santa Fe, NM 87501- Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Occupation attorney Aggregate Year-to-Date -> \$500.00
Full Name, Mailing Address and Zip Code David Rigby 113 Phoenix Ave. Albuquerque, NM 87107- Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Name of Employer Keleher and McLeod Date (month, day, year) 07/27/98 Amount of Each Receipt this Period \$250.00
Full Name, Mailing Address and Zip Code M. Thomas Wilson PO Box 6743 Santa Fe, NM 87501- Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Occupation attorney Aggregate Year-to-Date -> \$250.00
Full Name, Mailing Address and Zip Code M. Thomas Wilson PO Box 6743 Santa Fe, NM 87501- Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Name of Employer BGR Properties Date (month, day, year) 07/27/98 Amount of Each Receipt this Period \$500.00
Full Name, Mailing Address and Zip Code David Rigby 113 Phoenix Ave. Albuquerque, NM 87107- Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Occupation real estate Aggregate Year-to-Date -> \$500.00
Full Name, Mailing Address and Zip Code David Rigby 113 Phoenix Ave. Albuquerque, NM 87107- Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Name of Employer self Date (month, day, year) 07/28/98 Amount of Each Receipt this Period \$1000.00
Full Name, Mailing Address and Zip Code David Rigby 113 Phoenix Ave. Albuquerque, NM 87107- Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Occupation pilot/farmer Aggregate Year-to-Date -> \$1000.00

SUBTOTAL of Receipts This Page (optional)

\$5250.00

TOTAL This Period (last page this line number only)

## SCHEDULE A

## ITEMIZED RECEIPTS

 Separate attachments  
 each category of the  
 detailed Summary Page

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 FOR LINE NUMBER  
 11(c)

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 CONTRIBUTOR (in full)

Udall for Us All

Full Name, Mailing Address and Zip Code

 Sue Burnside  
 South Bay Voter Registration  
 1311 Tremaine Avenue  
 Los Angeles, CA 90019-

 Receipt For: ☒ Primary ☐ General  
☐ Other (specify)

Name of Employer

Date (month, day, year)

09/23/98

Amount of Each Receipt This Period

\$3000.00

Occupation

Aggregate Year-to-Date -&gt;

\$5000.00

Full Name, Mailing Address and Zip Code

 Marcia Balonick and Betsy Sheerr  
 Joint Action Committee for Pol. Affairs  
 PO Box 105  
 Highland Park, IL 60035-

 Receipt For: ☒ Primary ☐ General  
☐ Other (specify)

Name of Employer

Date (month, day, year)

09/25/98

Amount of Each Receipt This Period

\$500.00

Occupation

Aggregate Year-to-Date -&gt;

\$500.00

Full Name, Mailing Address and Zip Code

 George Trujillo  
 AFSCME Local 3100  
 PO Box 95  
 Cleveland, OH 87715-

 Receipt For: ☒ Primary ☐ General  
☐ Other (specify)

Name of Employer

Date (month, day, year)

09/28/98

Amount of Each Receipt This Period

\$150.00

Occupation

Aggregate Year-to-Date -&gt;

\$150.00

Full Name, Mailing Address and Zip Code

 T. Austin Raglione  
 The Committee for a Livable Future  
 921 SW. Washington Street, Suite 470  
 Portland, OR 97205-

 Receipt For: ☒ Primary ☐ General  
☐ Other (specify)

Name of Employer

Date (month, day, year)

09/29/98

Amount of Each Receipt This Period

\$5000.00

Occupation

Aggregate Year-to-Date -&gt;

\$3000.00

Full Name, Mailing Address and Zip Code

 Honorable Robert Wuxler  
 ZACKPAC  
 2500 N Military Trail Suite 288  
 Boca Raton, FL 33431-

 Receipt For: ☒ Primary ☐ General  
☐ Other (specify)

Name of Employer

Date (month, day, year)

09/30/98

Amount of Each Receipt This Period

\$1000.00

Occupation

Aggregate Year-to-Date -&gt;

\$1000.00

Full Name, Mailing Address and Zip Code

 Joe Martin  
 1701 Clarendon Blvd.

Arlington, VA 22209-

 Receipt For: ☒ Primary ☐ General  
☐ Other (specify)

Name of Employer

Date (month, day, year)

09/29/98

Amount of Each Receipt This Period

\$500.00

Occupation

Aggregate Year-to-Date -&gt;

\$500.00

Full Name, Mailing Address and Zip Code

 Julie Burton  
 Voters For Choice  
 PO Box 53301  
 Washington, DC 20009-

 Receipt For: ☒ Primary ☐ General  
☐ Other (specify)

Name of Employer

Date (month, day, year)

09/29/98

Amount of Each Receipt This Period

\$2000.00

Occupation

Aggregate Year-to-Date -&gt;

\$2000.00

SUBTOTAL of Receipts This Page (optional)

\$14150.00

TOTAL This Period (last page this line number only)