



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 780

Date Filmed 4/18/79 Camera No. --- 2

Cameraman SPC

1 0 7 1 1 0 1 0 6 6

FEDERAL ELECTION COMMISSION

Draft letter to NRSC (had been  
attached to First GC Report) - not sent.

The above-described material was removed from this file pursuant to the following exemption provided in the Freedom of Information Act, 5 U.S.C. Section 552(b):

- |                                                                                    |                                                                           |
|------------------------------------------------------------------------------------|---------------------------------------------------------------------------|
| <input type="checkbox"/> (1) Classified Information                                | <input type="checkbox"/> (6) Personal privacy                             |
| <input type="checkbox"/> (2) Internal rules and practices                          | <input type="checkbox"/> (7) Investigatory files                          |
| <input type="checkbox"/> (3) Exempted by other statute                             | <input type="checkbox"/> (8) Banking Information                          |
| <input type="checkbox"/> (4) Trade secrets and commercial or financial information | <input type="checkbox"/> (9) Well Information (geographic or geophysical) |
| <input checked="" type="checkbox"/> (5) Internal Documents                         |                                                                           |

Signed Vincent Honan  
date 1/24/79



## FEDERAL ELECTION COMMISSION

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

January 22, 1979

Mr. Walter K. Moore  
Washington Director  
National Committee for an  
Effective Congress  
505 C Street, N.E.  
Washington, D.C. 20002

Re: MUR 780

Dear Mr. Moore:

This is to advise you of the actions taken by the Commission as a result of your recent complaint.

On November 2, 1978, the Commission found no reason to believe that the Larry Williams for U.S. Senate Committee violated the Federal Election Campaign Act by "receiving financial assistance" from the National Republican Senatorial Committee (NRSC) in excess of the limits set out in 2 U.S.C. §441a(d).

On the same date, the Commission directed an inquiry into what appeared to be excessive "441a(d) expenditures" made by NRSC. Information subsequently provided by NRSC indicated that errors had been made in the categorization of certain entries in their reports of receipts and expenditures. NRSC amended those entries to reflect the following totals in connection with the Williams campaign: Section 441a(d) expenditures: \$44,580; Section 441 contributions: \$17,120. The totals in each category are within the limits set out in the Act.<sup>1</sup> Accordingly, on January 19, 1979, the Commission found no reason to believe that NRSC violated the Act as alleged in your complaint.

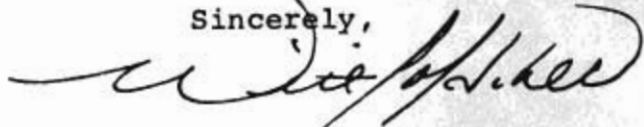
1. NRSC had been designated as agent by both the Republican National Committee and the Montana Republican State Central Committee for the purpose of making expenditures under 2 U.S.C. §441a(d) in connection with the Williams campaign.

- 2 -

The file in this matter has been closed.

Should you have any questions, please contact Commission attorney Vincent J. Convery, Jr., at 523-4060.

Sincerely,



William C. Oldaker  
General Counsel

vsc  
1/19/79

79040113787



FEDERAL ELECTION COMMISSION

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

January 22, 1979

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Rodney A. Smith  
Treasurer  
National Republican Senatorial  
Committee  
227 Massachusetts Avenue, N.E.  
Washington, D.C. 20002

Re: MUR 780

Dear Mr. Smith:

For your information, I am forwarding a copy of a complaint which was filed with the Commission.

The Commission has determined that there is no reason to believe that the National Republican Senatorial Committee has violated the Federal Election Campaign Act as alleged in the complaint. Accordingly, the file in this matter has been closed.

Should you have any questions, please contact Commission attorney Vincent J. Convery, Jr., at 202-523-4060.

Sincerely,

A handwritten signature in dark ink, appearing to read "William C. Oldaker", is written over the typed name.

William C. Oldaker  
General Counsel

VJC  
1/19/79

Enclosure

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
National Republican )  
Senatorial Committee )

MUR 780

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on January 19, 1979, the Commission determined by a vote of 5-0 to adopt the following recommendations, as set forth in the General Counsel's Report dated December 18, 1978, regarding the above-captioned matter.

1. Find no reason to believe that the National Republican Senatorial Committee violated 2 U.S.C. §441a(d), as alleged in the complaint.
2. Close the file in this matter.
3. Authorize the sending of the letters attached to the above-named report.

Voting for this determination were Commissioners Springer, Aikens, Tiernan, McGarry, and Thomson.

Attest:

1/19/79

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary to the Commission

Signed by General Counsel: 1-12-79  
Received in Office of Commission Secretary: 1-16-79, 1:20  
Circulated on 48 hour vote basis: 1-16-79, 3:00

79040113789

January 16, 1979

MEMORANDUM TO: Marge Malone  
FROM: Elissa T. Carr  
SUBJECT: MUR 780

Please have the attached General Counsel's Report  
on MUR 780 distributed to the Commission on a 48 hour  
tally basis.

Thank you.

79040113790

RECEIVED  
OFFICE OF THE  
COMMISSION SECRETARY

BEFORE THE FEDERAL ELECTION COMMISSION  
December 18, 1978

79 JAN 16 P 1: 20

In the Matter of )  
 ) MUR 780  
National Republican )  
Senatorial Committee )

GENERAL COUNSEL'S REPORT

On November 2, 1978, the Commission referred this matter to the Reports Analysis Division (RAD) for inquiry into what appeared to be excessive "441a(d) expenditures" made by the National Republican Senatorial Committee (NRSC) in connection with the 1978 Senate Campaign of Larry Williams in Montana. 1/

For purposes of making Section 441a(d) expenditures, NRSC had been designated as agent by both the Republican National Committee and the Montana Republican State Central Committee. By virtue of this dual agency, NRSC's 441a(d) expenditure limitation in Montana was \$44,580.2/ NRSC, however, reported 441a(d) expenditures of \$51,590.

1/ This matter had been initiated by a notarized complaint filed by Walter K. Moore of the National Committee for an Effective Congress. The complaint alleged that NRSC violated the Act by making excessive "441a(d) expenditures" in connection with the Williams campaign, and that the Larry Williams for U.S. Senate Committee violated the Act by "receiving financial assistance" from NRSC in excess of the statutory limitations. On November 2, the Commission found no reason to believe the Williams Committee violated the Act as alleged.

2/ The Republican National Committee and the Montana Republican State Central Committee were authorized by the statute to make "441a(d) expenditures" of up to \$24,580 each. In designating the NRSC as its agent for 441a(d) purposes, the Republican National Committee authorized NRSC to make expenditures of up to \$20,000. The Montana Republican State Central Committee authorized NRSC to make 441a(d) expenditures up to its \$24,580 maximum. Thus, the total \$44,580. (See Attachment I).

In their reply to RAD's inquiry, NRSC indicated that certain of their transactions had erroneously been designated "Section 441 expenditures" when they were, in fact, "Section 441 contributions." The transactions which had been misdesignated were specifically identified in NRSC's letter. (See Attachment II-2). The effect of their redesignation of the transactions in question is that NRSC's totals, in connection with the Williams campaign, now stand as follows: Section 441a(d) expenditures: \$44,580; Section 441 contributions: \$17,120.

The totals in each category are within the limits set out in the Act.<sup>3/</sup>

RECOMMENDATIONS

1. Find no reason to believe that the National Republican Senatorial Committee violated 2 U.S.C. §441a(d), as alleged in the complaint.
2. Close the file in this matter.
3. Authorize the sending of the attached letters.

1/12/79  
Date

William C. Oldaker  
General Counsel

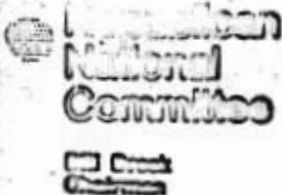
3/ 2 U.S.C. §441a(h) provides:

"Notwithstanding any other provision of this Act, amounts totaling not more than \$17,500 may be contributed to a candidate for nomination for election, or for election, to the United States Senate during the year in which an election is held in which he is such a candidate, by the Republican or Democratic Senatorial Campaign Committee, or the national committee of a political party, or any combination of such committees."

ATTACHMENTS

- I. Letters of Authorization
- II. Memo from RAD, with Attachments 1, 2, 3, dated 30 Nov.'78
- III. Proposed letter to NRSC
- IV. Proposed letter to complainant

79040113793



SECRETARY OF THE SENATE  
1978 JUL -1 17 11:40  
HAND DELIVERED

July 13, 1978

The Honorable Bob Packwood, Chairman  
National Republican Senatorial Committee  
227 Massachusetts Avenue, NE  
Washington, D. C. 20002

Dear Bob:

By this letter the Republican National Committee authorizes the National Republican Senatorial Committee to serve as the agent of the Republican National Committee, for the purpose of making expenditures pursuant to 2 USC S441a(d)(3). Your Committee is authorized to make these expenditures, on behalf of the Republican National Committee, in connection with the general election campaign of Larry Williams for U. S. Senate from Montana.

Under S441a(d)(3) you may spend, on the Republican National Committee's behalf, up to \$10,000 for Mr. Williams.

Best personal regards.

Very truly yours,

  
BILL BROCK

BB/bnp

cc: Ben Cotten  
Bob Moore  
Charlie Black  
Jacquie Myster  
Matt Wigan  
Jay Banning

Dwight D. Eisenhower Republican Center: 310 First Street Southeast, Washington, D.C. 20003. (202) 454-0000.

Attachment I-1

Republican  
National  
Committee

September 5, 1978

The Honorable Bob Packwood, Chairman  
National Republican Senatorial Committee  
227 Massachusetts Avenue, NE  
Washington, D. C. 20002

Dear Bob:

By this letter the Republican National Committee authorizes the National Republican Senatorial Committee to serve as the agent of the Republican National Committee, for the purpose of making expenditures pursuant to 2 USC 8441a (d) (3). Your Committee is authorized to make these expenditures, on behalf of the Republican National Committee, in connection with the general election campaign of Larry Williams of Montana.

Under 8441a (d) (3) you may spend, on the Republican National Committee's behalf, up to \$10,000 for Mr. Williams. /

Best personal regards.

Very truly yours,

  
BILL BROCK

BD/bnp

cc: Bob Moore  
Ben Cotton  
Charlie Black  
Jacquie Hystrom  
Matt Wiegau  
Jay Manning

Montana  
Republican  
State Central  
Committee.

Mrs. Florence S. Hagan, State Chairman  
Howard C. Foster, State Vice Chairman  
Clark Pylor, Treasurer  
Dr. David Colmery, Finance Chairman  
Ron Durham, Executive Director  
1425 Helena Avenue  
Helena, Montana 59601  
(406) 442-6400

October 16, 1970

Attention: Gray Jacksonback

The Honorable Bob Packwood  
Chairman  
National Republican Senatorial Committee  
227 Massachusetts Avenue, N.E.  
Washington, D.C. 20003

Dear Senator Packwood:

By this letter the Montana Republican State Central Committee authorizes the National Republican Senatorial Committee to serve as the agent of the Montana State Republican Committee, for the purpose of making expenditures pursuant to 2 USC Section 441 a(d) (1) (3) in 1970. Your Committee is authorized to make these expenditures on behalf of the Montana Republican State Central Committee in connection with the general election campaign in Montana.

You may spend an additional \$3,500 on behalf of the Montana Republican State Central Committee, bringing the total authorization in 1970 to the maximum of \$24,500 allowed by law.

Thank you very much.

Sincerely,  
  
Ron Durham  
Executive Director

Attachment I-3

79020164102

79040113797

Montana  
Republican  
State Control  
Committee.

Mrs. Florence S. Haegen, State Chairman  
Howard C. Porter, State Vice Chairman  
Clark Pyfer, Treasurer  
Dr. David Catmoy, Finance Chairman  
Ken Dunham, Executive Director  
1425 Helena Avenue  
Helena, Montana 59601  
(406) 442-0403

May 5, 1970

Honorable Bob Packwood  
Chairman  
National Republican Senatorial Committee  
227 Massachusetts Avenue, N.E.  
Washington, D.C. 20002

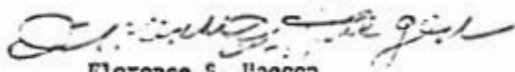
Dear Senator Packwood:

By this letter the Montana State Republican Control Committee authorizes the National Republican Senatorial Committee to serve as the agent of the Montana State Republican Committee, for the purpose of making expenditures pursuant to 2 USC Section 441 a (d)(1)(3) in 1970. Your Committee is authorized to make these expenditures on behalf of the Montana State Republican Committee in connection with the general election campaign for the Senate in Montana.

Under Section 441 a (d)(1)(3), you may spend on the Montana State Republican Committee's behalf up to \$21,000.

We appreciate your cooperation in this important task that the 1970 election has presented us with, particularly in light of the new Federal Election Campaign Act.

Best wishes,

  
Florence S. Haegen  
State Chairman

FCH/kab

Attachment I-4

48-25

\*ORIGIN: OEC

ANALYST Dug Greevy

ATTENTION: The Commission

TEAM CHIEF Pease Lewis

THROUGH: STAFF DIRECTOR

COMPLIANCE REVIEW C. Breen

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS *ML*

MUR No. 780

DATE OF ORIGINAL REFERRAL 11-2-78

**\*\*PURPOSE:** At the direction of the Commission, 3SV1/78-138 was sent to the National Republican Senatorial Committee-Expenditures regarding the possibility that the committee may have exceeded its limits for making coordinated expenditures on behalf of Larry Williams, Montana. Attachm

Attachment 1

Response was received from the committee on 11/13/78.

Attachment 2

10 Day Pre-General Election Report filed by Williams for U.S. Senate Committee confirms response of 11/13/78.

Attachment 3

**OUTCOME:** (if applicable)

## Attachment II

\*Commission unit which initiated original Referral (e.g. AUDIT/RAD/OGC).

**\*\*INFORMATION, or RESULTS OF RAD ACTION, as appropriate.**



FEDERAL ELECTION COMMISSION

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

November 6, 1978

Rodney A. Smith, Treasurer  
National Republican Senatorial Committee-Expenditures  
227 Massachusetts Avenue, N.E.  
Washington, D.C. 20002

Dear Mr. Smith:

This letter is prompted by the Commission's interest in assisting political committees which wish to comply with the Federal Election Campaign Act, as amended. This law, as you know, has many and sometimes complex provisions. One such provision precludes a national committee of a political party or a State committee of a political party from making expenditures in connection with the 1978 general election campaign of a candidate for the United States Senate which exceed the State Voting Age Population (VAP) x \$0.02, plus the 1978 increase in the Consumer Price Index (CPI) of 22.9 percent; or \$24,580, whichever is greater.

The Commission notes that your committee was authorized to make expenditures in accordance with 2 U.S.C. 441a(d) in connection with the general election campaign of the party's candidate for the United States Senate in Montana. Specifically, the Republican National Committee-Expenditures and the Montana Republican State Central Committee have authorized your committee to make such expenditures up to \$20,000 and \$24,580, respectively.

During review of the July 20 Monthly (Amended), the August 20 Monthly, the October 20 Monthly, and the Ten Day Pre-General Election Reports of Receipts and Expenditures filed with the Secretary of the Senate, we noticed entries indicating that you may have made expenditures in accordance with 2 U.S.C. 441a(d) which exceed the amounts you were authorized to expend.

In addition, the Commission notes that the committee has exceeded the combined limit of \$49,160 provided to the national committee and the State committee of a political party for the making of such expenditures. Copies of those portions of your reports are attached so that a review of your records can be made.

Attachment II-1

If you find that the entries in question are incomplete or incorrect, please submit a statement which would clarify this particular matter for the public record. You may do so by amending your original report by letter.

If you find that the expenditures you made were in excess of the limits set forth in the Act, please notify the Commission of such by letter.

Please notify the Commission within ten (10) days of receipt of this letter of the determination made on this matter. If you have any questions please notify David U. Greevy, our Reports Analyst assigned to you. Our phone number is (202)523-1474, or toll free number (800)424-9530.

Sincerely,

*Orlando B. Potter*

Orlando B. Potter

Certified Mail  
Return Receipt Requested  
Enclosure

5/10/82 5:16 PM 31087

# National Republican Senatorial Committee

Executive Director  
Washington, D.C.

## MEMBERS

Mr. Howard H. Call, Jr., Pres.  
Mr. J. Paul Smith, R. E.  
Mr. J. W. G. Smith, Asst. Pres.  
Mr. J. W. G. Smith, Secy.  
Mr. J. W. G. Smith, Treas.  
Mr. J. W. G. Smith, Asst. Secy.  
Mr. J. W. G. Smith, Asst. Treas.  
Mr. J. W. G. Smith, Asst. Secy.  
Mr. J. W. G. Smith, Asst. Treas.  
Mr. J. W. G. Smith, Asst. Secy.  
Mr. J. W. G. Smith, Asst. Treas.

Redney A. Smith  
Treasurer

November 10, 1978

The Honorable J. Stanley Kimmitt  
Secretary of the Senate  
Office of Public Records  
119 D Street, N. E.  
Washington, D. C. 20510

S 323

9/1/78 - 9/21/78

RE: 35VI/78-138

Dear Sir:

The Federal Election Commission notified me that the National Republican Senatorial Committee exceeded the amount it was authorized to spend on Larry Williams behalf in Montana.

In reviewing our internal records, I found that the following two expenditures were shown on the Committee's September Report to be Section 441 Expenditures when they were, in fact, Section 441 Contributions:

### Section 441 In-Kind Contributions

|         |                                                                   |                          |           |
|---------|-------------------------------------------------------------------|--------------------------|-----------|
| 9/27/78 | Wendt Advertising<br>P. O. Box 2128<br>Great Falls, Montana 59403 | Media<br>Advertising     | \$ 7,010. |
| 10/3/78 | Paul McCloskey<br>200 Cannon Building<br>Washington, D. C. 20515  | Expense<br>Reimbursement | \$ 110.   |

### Section 441 Expenditures

|         |                                                                   |                      |           |
|---------|-------------------------------------------------------------------|----------------------|-----------|
| 9/27/78 | Wendt Advertising<br>P. O. Box 2128<br>Great Falls, Montana 59403 | Media<br>Advertising | \$17,990. |
|---------|-------------------------------------------------------------------|----------------------|-----------|

Accordingly, the National Republican Senatorial Committee did not exceed its authorized spending limit in Montana.

Sincerely,

*Redney A. Smith*

Redney A. Smith  
Treasurer

Attachment II-2

✓

227 Massachusetts Avenue, N.E. • Washington, D.C. 20002 • (202) 224-2351

Printed on recycled paper. The National Republican Senatorial Committee is an equal opportunity organization.

SCHEDULE A  
 REVISED  
 January, 1973  
 Federal Election Commission  
 1325 K Street, N.W.  
 Washington, D.C. 20462

# ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind,  
 Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, end/or 10a  
 of FEC FORM 3

Page 2 of 3 for  
 Line Number 150

Use Separate Schedule for  
 each numbered line

| Name of Candidate or Committee in Full                                                                                                                                                                                                                  |                                               |                                            |                                                           |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------|--------------------------------------------|-----------------------------------------------------------|
| <b>CLAYTON WILLIAMS FOR U. S. SENATE</b>                                                                                                                                                                                                                |                                               |                                            |                                                           |
| Full Name, Mailing Address and ZIP Code<br><b>Roosevelt County Republican<br/>           Women<br/>           Wolf Point, MT 59201</b>                                                                                                                  | Principal Place of Business<br><br>Occupation | Date (month, day, year)<br><b>10-16-78</b> | Amount of each Receipt<br>this Period<br><b>\$ 10.00</b>  |
| Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/> Check <input type="checkbox"/> Contributor is self-employed<br>Aggregate Year To Date <b>\$ 210.00</b>            |                                               |                                            |                                                           |
| Full Name, Mailing Address and ZIP Code<br><b>Roosebud County Republican<br/>           Central Committee<br/>           Foreyth, MT 59327</b>                                                                                                          | Principal Place of Business<br><br>Occupation | Date (month, day, year)<br><b>10-18-78</b> | Amount of each Receipt<br>this Period<br><b>\$ 10.00</b>  |
| Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/> Check <input type="checkbox"/> Contributor is self-employed<br>Aggregate Year To Date <b>\$ 100.00</b>            |                                               |                                            |                                                           |
| Full Name, Mailing Address and ZIP Code<br><b>Sheridan County Republican<br/>           Central Committee<br/>           Plentywood, MT 59254</b>                                                                                                       | Principal Place of Business<br><br>Occupation | Date (month, day, year)<br><b>10-16-78</b> | Amount of each Receipt<br>this Period<br><b>\$ 150.00</b> |
| Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/> Check <input type="checkbox"/> Contributor is self-employed<br>Aggregate Year To Date <b>\$ 150.00</b>            |                                               |                                            |                                                           |
| Full Name, Mailing Address and ZIP Code<br><b>Valley County Republican<br/>           Central Committee<br/>           Glasgow, MT 59230</b>                                                                                                            | Principal Place of Business<br><br>Occupation | Date (month, day, year)<br><b>10-17-78</b> | Amount of each Receipt<br>this Period<br><b>\$ 300.00</b> |
| Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/> Check <input type="checkbox"/> Contributor is self-employed<br>Aggregate Year To Date <b>\$ 1500.00</b>           |                                               |                                            |                                                           |
| Full Name, Mailing Address and ZIP Code<br><b>NATIONAL REPUBLICAN SENATORIAL<br/>           COMMITTEE<br/>           227 MONTGOMERY AVE, N.E.<br/>           WASHINGTON, DC 20002</b>                                                                   | Principal Place of Business<br><br>Occupation | Date (month, day, year)<br><b>10/12/78</b> | Amount of each Receipt<br>this Period<br><b>\$ 700.00</b> |
| Receipt for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/> Check <input type="checkbox"/> Contributor is self-employed<br>Aggregate Year To Date <b>\$ 17,120</b> |                                               |                                            |                                                           |
| Full Name, Mailing Address and ZIP Code<br><br><br><br>                                                                                                                                                                                                 | Principal Place of Business<br><br>Occupation | Date (month, day, year)<br><br>            | Amount of each Receipt<br>this Period<br><br>             |
| Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/> Check <input type="checkbox"/> Contributor is self-employed<br>Aggregate Year To Date <b>\$</b>                   |                                               |                                            |                                                           |
| Full Name, Mailing Address and ZIP Code<br><br><br><br>                                                                                                                                                                                                 | Principal Place of Business<br><br>Occupation | Date (month, day, year)<br><br>            | Amount of each Receipt<br>this Period<br><br>             |
| Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/> Check <input type="checkbox"/> Contributor is self-employed<br>Aggregate Year To Date <b>\$</b>                   |                                               |                                            |                                                           |
| CUSTOTAL of receipts this page (optional)                                                                                                                                                                                                               |                                               |                                            | <b>\$</b>                                                 |
| TOTAL this period (last page this line number only)                                                                                                                                                                                                     |                                               |                                            | <b>\$ 41,173.00</b>                                       |

Attachment II-3

170040113802  
 78020170613



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Rodney A. Smith  
Treasurer  
National Republican Senatorial  
Committee  
227 Massachusetts Avenue, N.E.  
Washington, D.C. 20002

Re: MUR 780

Dear Mr. Smith:

For your information, I am forwarding a copy of a complaint which was filed with the Commission.

The Commission has determined that there is no reason to believe that the National Republican Senatorial Committee has violated the Federal Election Campaign Act as alleged in the complaint. Accordingly, the file in this matter has been closed.

Should you have any questions, please contact Commission attorney Vincent J. Convery, Jr., at 202-523-4060.

Sincerely,

William C. Oldaker  
General Counsel

Enclosure

Attachment III



FEDERAL ELECTION COMMISSION

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

Mr. Walter K. Moore  
Washington Director  
National Committee for an  
Effective Congress  
505 C Street, N.E.  
Washington, D.C. 20002

Re: MUR 780

Dear Mr. Moore:

This is to advise you of the actions taken by the Commission as a result of your recent complaint.

On November 2, 1978, the Commission found no reason to believe that the Larry Williams for U.S. Senate Committee violated the Federal Election Campaign Act by "receiving financial assistance" from the National Republican Senatorial Committee (NRSC) in excess of the limits set out in 2 U.S.C. §441a(d).

On the same date the Commission directed an inquiry into what appeared to be excessive "441a(d) expenditures" made by NRSC. Information subsequently provided by NRSC indicated that errors had been made as to the categorization of certain entries in their reports of receipts and expenditures. NRSC amended those entries to reflect the following totals in connection with the Williams campaign: Section 441a(d) expenditures: \$44,580; Section 441 contributions: \$17,120. The totals in each category are within the limits set out in the Act.<sup>1/</sup> Accordingly, on December 1, 1978, the Commission found no reason to believe that NRSC violated the Act as alleged in your complaint.

---

<sup>1/</sup> NRSC had been designated as agent by both the Republican National Committee and the Montana Republican State Central Committee for the purpose of making expenditures under 2 U.S.C. §441a(d) in connection with the Williams campaign.

Attachment IV

- 2 -

The file in this matter has been closed.

Should you have any questions, please contact Commission attorney Vincent J. Convery, Jr., at 523-4060.

Sincerely,

William C. Oldaker  
General Counsel

REPORTS ANALYSIS REFERRAL UPDATE

\*ORIGIN: OGC

DATE 11-30-78

ANALYST Dug Greevy

TO:

ATTENTION: The Commission

TEAM CHIEF Peppy Smith

THROUGH: STAFF DIRECTOR OP

COMPLIANCE REVIEW C. Breen

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS MAH

MUR No. 780

DATE OF ORIGINAL REFERRAL 11-2-78

**\*\*PURPOSE:** At the direction of the Commission, 3SV1/78-138 was sent to the National Republican Senatorial Committee-Expenditures regarding the possibility that the committee may have exceeded its limits for making coordinated expenditures on behalf of Larry Williams, Montana.

Attachment 1

Response was received from the committee on 11/13/78.

Attachment 2

10 Day Pre-General Election Report filed by Williams for U.S. Senate Committee confirms response of 11/13/78.

Attachment 3

OUTCOME: (if applicable)

\*Commission unit which initiated original Referral (e.g. AUDIT/RAD/OGC).

\*\*INFORMATION, or RESULTS OF RAD ACTION, as appropriate.

7 9 0 4 0 1 1 3 8 0 5



FEDERAL ELECTION COMMISSION

1125 K STREET N.W.  
WASHINGTON, D.C. 20461

November 6, 1978

Rodney A. Smith, Treasurer  
National Republican Senatorial Committee-Expenditures  
227 Massachusetts Avenue, N.E.  
Washington, D.C. 20002

Dear Mr. Smith:

This letter is prompted by the Commission's interest in assisting political committees which wish to comply with the Federal Election Campaign Act, as amended. This law, as you know, has many and sometimes complex provisions. One such provision precludes a national committee of a political party or a State committee of a political party from making expenditures in connection with the 1978 general election campaign of a candidate for the United States Senate which exceed the State Voting Age Population (VAP) x \$0.02, plus the 1978 increase in the Consumer Price Index (CPI) of 22.9 percent; or \$24,580, whichever is greater.

The Commission notes that your committee was authorized to make expenditures in accordance with 2 U.S.C. 441a(d) in connection with the general election campaign of the party's candidate for the United States Senate in Montana. Specifically, the Republican National Committee-Expenditures and the Montana Republican State Central Committee have authorized your committee to make such expenditures up to \$20,000 and \$24,580, respectively.

During review of the July 20 Monthly (Amended), the August 20 Monthly, the October 20 Monthly, and the Ten Day Pre-General Election Reports of Receipts and Expenditures filed with the Secretary of the Senate, we noticed entries indicating that you may have made expenditures in accordance with 2 U.S.C. 441a(d) which exceed the amounts you were authorized to expend.

In addition, the Commission notes that the committee has exceeded the combined limit of \$49,160 provided to the national committee and the State committee of a political party for the making of such expenditures. Copies of those portions of your reports are attached so that a review of your records can be made.

38030952874

If you find that the entries in question are incomplete or incorrect, please submit a statement which would clarify this particular matter for the public record. You may do so by amending your original report by letter.

If you find that the expenditures you made were in excess of the limits set forth in the Act, please notify the Commission of such by letter.

Please notify the Commission within ten (10) days of receipt of this letter of the determination made on this matter. If you have any questions please notify David U. Greevy, our Reports Analyst assigned to you. Our phone number is (202)523-1474, or toll free number (800)424-9530.

Sincerely,

*Orlando B. Potter*

Orlando B. Potter

Certified Mail  
Return Receipt Requested  
Enclosure

7 8 0 3 0 3 5 2 8 7 3

U.S. SENATE  
 Finance Committee  
 100 SENATE  
 WASHINGTON, D.C. 20510

CONGRESSIONAL CAMPAIGN FINANCE REPORT  
 (2002, 2004, 2006)  
 (Supporting Line 21, FEC Form 3)

(To be used only by Political Committees in the General Election)

Page 6 of 6  
 For Line 21, FEC Form 3

| National Republican Senatorial Committee                                                |                                                                      |                                           |                         |           |
|-----------------------------------------------------------------------------------------|----------------------------------------------------------------------|-------------------------------------------|-------------------------|-----------|
| Name of Political Committee (Do not include "National Republican Senatorial Committee") |                                                                      |                                           |                         |           |
| Name of Federal Candidate Supported, State, District & Office Sought                    |                                                                      |                                           |                         |           |
| Particulars of Expenditure                                                              |                                                                      |                                           |                         |           |
| Date (month, day, year)                                                                 |                                                                      |                                           |                         |           |
| Amount                                                                                  |                                                                      |                                           |                         |           |
| Christopher Lord<br>5401 Westford Avenue<br>Bethesda, Maryland 20816                    | Larry Williams<br>U. S. Senator<br>Montana                           | Political Research<br>Project (Allocated) | 5-30-70                 | \$ 140.00 |
| Aggregate General Election Expenditure for this Candidate - \$                          |                                                                      |                                           |                         |           |
| Full Name, Mailing Address and ZIP Code of Each Payer                                   | Name of Federal Candidate Supported, State, District & Office Sought | Particulars of Expenditure                | Date (month, day, year) | Amount    |
|                                                                                         |                                                                      |                                           |                         |           |
| Aggregate General Election Expenditure for this Candidate - \$                          |                                                                      |                                           |                         |           |
| Full Name, Mailing Address and ZIP Code of Each Payer                                   | Name of Federal Candidate Supported, State, District & Office Sought | Particulars of Expenditure                | Date (month, day, year) | Amount    |
|                                                                                         |                                                                      |                                           |                         |           |
| Aggregate General Election Expenditure for this Candidate - \$                          |                                                                      |                                           |                         |           |
| Full Name, Mailing Address and ZIP Code of Each Payer                                   | Name of Federal Candidate Supported, State, District & Office Sought | Particulars of Expenditure                | Date (month, day, year) | Amount    |
|                                                                                         |                                                                      |                                           |                         |           |
| Aggregate General Election Expenditure for this Candidate - \$                          |                                                                      |                                           |                         |           |
| Full Name, Mailing Address and ZIP Code of Each Payer                                   | Name of Federal Candidate Supported, State, District & Office Sought | Particulars of Expenditure                | Date (month, day, year) | Amount    |
|                                                                                         |                                                                      |                                           |                         |           |
| Aggregate General Election Expenditure for this Candidate - \$                          |                                                                      |                                           |                         |           |
| SUBTOTAL of expenditures this page (optional)                                           |                                                                      |                                           |                         | \$        |
| TOTAL (this covers this page this line number only)                                     |                                                                      |                                           |                         | \$        |

U.S. GOVERNMENT  
PRINTING OFFICE  
WASHINGTON, D.C. 20540

**NATIONAL REPUBLICAN SENATORIAL COMMITTEE**  
(Supporting Line 24, FEC Form 2)

(To be used only by Political Committees in the General Election)

File with 24, FEC Form 2

| National Republican Senatorial Committee-Expenditures                                                          |                                                                      |                            |                                     |              |
|----------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------|----------------------------|-------------------------------------|--------------|
| This year's expenditures have been reported to the Federal Election Commission by a political party committee? |                                                                      |                            |                                     |              |
| Republican National Committee                                                                                  |                                                                      |                            |                                     |              |
| Full Name, Mailing Address and ZIP Code of Each Payee                                                          | Name of Federal Candidate Supported, State, District & Office Sought | Particulars of Expenditure | Expenditure Date (month, day, year) | Amount       |
| The Sulgert Company,<br>1103 Amalie Street<br>New Orleans, Louisiana<br>70115                                  | Citizens for Cochran<br>for Senate-Mississippi                       | Media Advertising          | 7-11-70                             | \$ 35,232.00 |
| Aggregate General Election Expenditure for this Candidate - \$                                                 |                                                                      |                            |                                     |              |
| Bill Lee<br>Suite 6602<br>1743 Jefferson Davis Hwy.<br>Arlington, Virginia 22202                               | Citizens for Cochran<br>for Senate-Mississippi                       | Political Consulting       | 7-12-70                             | 1,623.00     |
| Aggregate General Election Expenditure for this Candidate - \$                                                 |                                                                      |                            |                                     |              |
| Decision Making Information<br>Suite 6800<br>2700 N. Main Street<br>Santa Ana, California<br>92701             | Tressler for Senate<br>South Dakota                                  | Poll                       | 7-12-70                             | 5,700.00     |
| Aggregate General Election Expenditure for this Candidate - \$                                                 |                                                                      |                            |                                     |              |
| Arthur J. Finkelstein &<br>Associates<br>13 Third Street<br>Rye, New York 10580                                | Obenshain for U. S.<br>Senate - Virginia                             | Poll                       | 7-17-70                             | 15,000.00    |
| Aggregate General Election Expenditure for this Candidate - \$                                                 |                                                                      |                            |                                     |              |
| Decision Making Information<br>2700 North Main Street<br>Santa Ana, California<br>92701                        | William for Senate -<br>Montana                                      | Poll                       | 7-17-70                             | 10,000.00    |
| Aggregate General Election Expenditure for this Candidate - \$                                                 |                                                                      |                            |                                     |              |
| TOTAL of expenditures this year (continued)                                                                    |                                                                      |                            |                                     | \$67,555.00  |
| Total of all general election expenditures this year (continued)                                               |                                                                      |                            |                                     | \$           |

73020103667

SCHEDULE P  
 January, 1978  
 Federal Election Commission  
 25 K Street, N.W.  
 Washington, D.C. 20463

ITEMIZED COORDINATED EXPENDITURES MADE BY  
 POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S)  
 ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE  
 (2, U.S.C. 441a(d))  
 (Supporting Line 24, FEC Form 3)

Page 2 of 27  
 For Line 24, FEC Form 3

(To be used only by Political Committees in the General Election)

Name of Political Committee in Full

National Republican Senatorial Committee

Has your Committee been designated to make coordinated expenditures by a political party committee? ☒ YES ☐ NO

If YES, name the designating committee

Republican National and/or Respective State Committees

| Full Name, Mailing Address and ZIP Code of Each Payee                         | Name of Federal Candidate Supported, State, District & Office Sought | Particulars of Expenditure | Date (month, day, year) | Amount     |
|-------------------------------------------------------------------------------|----------------------------------------------------------------------|----------------------------|-------------------------|------------|
| Wendt Advertising<br>P. O. Box 2128<br>Great Falls, Montana<br>59403          | Williams for Senate<br>Montana                                       | Media Advertising          | 9-6-78                  | \$ 10,000. |
| Aggregate General Election Expenditure for this Candidate - \$                |                                                                      |                            |                         |            |
| Ruth Jones, Ltd.<br>123 East 75th Street<br>New York, New York 10021          | Bell for Senate Comm.<br>New Jersey                                  | Media Advertising          | 9-6-78                  | 25,000.    |
| Aggregate General Election Expenditure for this Candidate - \$                |                                                                      |                            |                         |            |
| Envelopes Unlimited, Inc.<br>649 N. Horners Lane<br>Rockville, Maryland 20850 | Durenberger for Senate<br>Minnesota                                  | Envelopes                  | 9-7-78                  | 191.       |
| Aggregate General Election Expenditure for this Candidate - \$                |                                                                      |                            |                         |            |
| Communication Specialists, Inc.<br>P. O. Box 1529<br>Austin, Texas 78767      | Texans for Tower<br>Texas                                            | Printing services          | 9-11-78                 | \$2,180.   |
| Aggregate General Election Expenditure for this Candidate - \$                |                                                                      |                            |                         |            |
| J. Bruce Hildebrand<br>192 Twiggs Corner<br>Peachtree City, Georgia<br>30269  | Bell for Senate Comm.<br>New Jersey                                  | Political Consulting       | 9-8-78                  | 2,500.     |
| Aggregate General Election Expenditure for this Candidate - \$                |                                                                      |                            |                         |            |

SUBTOTAL of expenditures this page (optional):

\$

TOTAL this period (last page this line number only):

\$



**SCHEDULE F**

January, 1978

Federal Election Commission

25 K Street, N.W.

Washington, D.C. 20463

**ITEMIZED COORDINATED EXPENDITURES MADE BY  
POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S)  
ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE**

(2 U.S.C. 441a(d))

(Supporting Line 24, FEC Form 3)

(To be used only by Political Committees in the General Election)

Page 14 of 21

For Line 24, FEC Form 3

Name of Political Committee in Full

**National Republican Senatorial Committee-Expenditures**

Has your Committee been designated to make coordinated expenditures by a political party committee? ☒ YES ☐ NO

If YES, name the designating committee: Republican National and/or respective State Committee

| Full Name, Mailing Address and ZIP Code of Each Payee                                | Name of Federal Candidate Supported, State, District & Office Sought | Particulars of Expenditure | Date (month, day, year) | Amount    |
|--------------------------------------------------------------------------------------|----------------------------------------------------------------------|----------------------------|-------------------------|-----------|
| Institutional Sales, Inc.<br>2295 University Ave.<br>St. Paul, Minnesota 55114       | Durenberger for Senate<br>Minnesota                                  | Office furnishings         | 9-27-78                 | \$ 338.00 |
| Aggregate General Election Expenditure for this Candidate - \$                       |                                                                      |                            |                         |           |
| Meyers & Associates, Inc.<br>12101 - 12th Ave., South<br>Burnsville, Minnesota 55337 | Durenberger for Senate<br>Minnesota                                  | Printing services          | 9-27-78                 | 1,642.00  |
| Aggregate General Election Expenditure for this Candidate - \$                       |                                                                      |                            |                         |           |
| Roger Ailes & Associates<br>230 Central Park South<br>New York, New York 10019       | Durenberger for Senate<br>Minnesota                                  | Media Consulting           | 9-27-78                 | 11,000.00 |
| Aggregate General Election Expenditure for this Candidate - \$                       |                                                                      |                            |                         |           |
| Wendt Advertising<br>P. O. Box 2128<br>Great Falls, Montana 59403                    | Williams for Senate<br>Montana                                       | Media Advertising          | 9-27-78                 | 25,000.00 |
| Aggregate General Election Expenditure for this Candidate - \$                       |                                                                      |                            |                         |           |
| Envelopes Unlimited, Inc.<br>649 N. Horners Lane<br>Rockville, MD 20850              | Citizens for Cochran<br>Mississippi                                  | Envelope Stock             | 9-27-78                 | 549.70    |
| Aggregate General Election Expenditure for this Candidate - \$                       |                                                                      |                            |                         |           |

SUBTOTAL of expenditures this page (optional) \$

TOTAL this period (last page this line number only)

| Part II - Schedule of Disbursements - Expenses                                                                                                                                            |                                                  |                           |         |          |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------|---------------------------|---------|----------|
| Organization Name                                                                                                                                                                         | Disbursement Category                            | Disbursement Description  | Date    | Amount   |
| Carol Ems<br>c/o Citizens for Percy<br>Suite 6200<br>11 South Michigan Avenue<br>Chicago, Illinois 60603                                                                                  | Citizens for Percy<br>Illinois                   | Special Consultant        | 10/3/73 | 500.00   |
| <small>           Approved General Election Expenditures for this Candidate - \$<br/>           Name of Federal Candidate Supported, State, District &amp; Office Sought         </small> |                                                  |                           |         |          |
| Mr. El Rinto<br>1215 Main Page Drive<br>Springfield, Virginia 22151                                                                                                                       | Brooks Committee<br>Massachusetts                | Reimbursement of Expenses | 10/3/70 | 100.00   |
| <small>           Approved General Election Expenditures for this Candidate - \$<br/>           Name of Federal Candidate Supported, State, District &amp; Office Sought         </small> |                                                  |                           |         |          |
| Congressman Paul McCloskey<br>Capitol Building<br>Washington, D. C. 20515                                                                                                                 | Williams for Senate<br>Montana                   | Reimbursement of Expenses | 10/3/70 | 110.00   |
| <small>           Approved General Election Expenditures for this Candidate - \$<br/>           Name of Federal Candidate Supported, State, District &amp; Office Sought         </small> |                                                  |                           |         |          |
| Arthur J. Finkelstein &<br>Associates<br>13 Third Street<br>New York, New York 10003                                                                                                      | Re-Elect Thurmond<br>Committee<br>South Carolina | Media Advertising         | 10/3/70 | 4,703.71 |
| <small>           Approved General Election Expenditures for this Candidate - \$<br/>           Name of Federal Candidate Supported, State, District &amp; Office Sought         </small> |                                                  |                           |         |          |
| Thurmond for Senate, Inc.<br>117 South Avenue<br>Columbia, S. C. 29201                                                                                                                    | Re-Elect Thurmond<br>Committee<br>South Carolina | Media Advertising         | 10/3/70 | 9,050.00 |
| <small>           Approved General Election Expenditures for this Candidate - \$<br/>           Name of Federal Candidate Supported, State, District &amp; Office Sought         </small> |                                                  |                           |         |          |

# National Republican Senatorial Committee

Executive Eric F. Finkbeiner  
Chairman, Oregon

SENATORIAL  
Sen. Howard H. P. Smith, Jr., Tenn.  
Sen. John H. Chafee, R.I.  
Sen. Clay Bennett, Ark.  
Sen. Charles G. McNair, Ind.  
Sen. E. L. Roybal, Calif.  
Sen. H. J. Bone, Ill.  
Sen. Charles McNair, Ind.  
Sen. William V. Roth, Jr., Del.  
Sen. Harrison Schmitt, N.H.  
Sen. Richard S. Schweiker, Penn.  
Sen. Robert T. Stafford, Vermont  
Sen. Mike S. Young, Utah

Rodney A. Smith  
Treasurer

November 10, 1978

The Honorable J. Stanley Kimmitt  
Secretary of the Senate  
Office of Public Records  
119 D Street, N. E.  
Washington, D. C. 20510

S323

9/1/78 - 9/23/78

RE: 3SVI/78-138

Dear Sir:

The Federal Election Commission notified me that the National Republican Senatorial Committee exceeded the amount it was authorized to spend on Larry Williams behalf in Montana.

In reviewing our internal records, I found that the following two expenditures were shown on the Committee's September Report to be Section 441 Expenditures when they were, in fact, Section 441 Contributions:

## Section 441 In-Kind Contributions

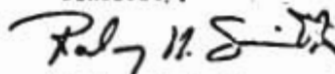
|         |                                                                   |                          |           |
|---------|-------------------------------------------------------------------|--------------------------|-----------|
| 9/27/78 | Wendt Advertising<br>P. O. Box 2128<br>Great Falls, Montana 59403 | Media<br>Advertising     | \$ 7,010. |
| 10/3/78 | Paul McCloskey<br>200 Cannon Building<br>Washington, D. C. 20515  | Expense<br>Reimbursement | \$ 110.   |

## Section 441 Expenditures

|         |                                                                   |                      |           |
|---------|-------------------------------------------------------------------|----------------------|-----------|
| 9/27/78 | Wendt Advertising<br>P. O. Box 2128<br>Great Falls, Montana 59403 | Media<br>Advertising | \$17,990. |
|---------|-------------------------------------------------------------------|----------------------|-----------|

Accordingly, the National Republican Senatorial Committee did not exceed its authorized spending limit in Montana.

Sincerely,



Rodney A. Smith  
Treasurer

22700-100-0000-0000-0000-0000-0000-0000  
Washington, D.C. 20002



ZIP CODE

58 •

1978: 10 10 10 10 10 10

The Honorable J. Stanley Kinnitt  
Secretary of the Senate  
Office of Public Records  
119 D Street, N. E.  
Washington, D. C. 20510

52

290666

**ITEMIZED RECEIPTS**  
 (Contributions, Transfers, Contribution In-Kind,  
 Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 10a  
 of FEC FORM 3

Page 2 of 3 for  
 Line Number 150

Use Separate Schedules for  
 each numbered line

Name of Candidate or Committee in Full

**"LARRY WILLIAMS FOR U. S. SENATE"**

Full Name, Mailing Address and ZIP Code

Roosevelt County Republican  
 Women  
 Wolf Point, MT 59201

Principal Place of Business

Occupation

Date (month,  
 day, year)

10-16-78

Amount of each Receipt  
 this Period

\$ 10.00

Receipt for

☐ Primary ☒ General ☐ Other

☐ Check ☐ Contributor is self-employed

Aggregate Year To Date \$ 210.00

Full Name, Mailing Address and ZIP Code

Posebud County Republican  
 Central Committee  
 Forsyth, MT 59327

Principal Place of Business

Occupation

Date (month,  
 day, year)

10-18-78

Amount of each Receipt  
 this Period

\$ 10.00

Receipt for

☐ Primary ☒ General ☐ Other

☐ Check ☐ Contributor is self-employed

Aggregate Year To Date \$ 160.00

Full Name, Mailing Address and ZIP Code

Sheridan County Republican  
 Central Committee  
 Plentywood, MT 59254

Principal Place of Business

Occupation

Date (month,  
 day, year)

10-16-78

Amount of each Receipt  
 this Period

\$ 150.00

Receipt for

☐ Primary ☒ General ☐ Other

☐ Check ☐ Contributor is self-employed

Aggregate Year To Date \$ 150.00

Full Name, Mailing Address and ZIP Code

Valley County Republican  
 Central Committee  
 Glasgow, MT 59230

Principal Place of Business

Occupation

Date (month,  
 day, year)

10-17-78

Amount of each Receipt  
 this Period

\$ 300.00

Receipt for

☐ Primary ☒ General ☐ Other

☐ Check ☐ Contributor is self-employed

Aggregate Year To Date \$ 1500.00

Full Name, Mailing Address and ZIP Code

NATIONAL REPUBLICAN SENATORIAL  
 COMMITTEE  
 227 KENNEDY DRIVE, N.E.  
 WASHINGTON, D.C. 20002

Principal Place of Business

Occupation

Date (month,  
 day, year)

10/2/78

Amount of each Receipt  
 this Period

\$ 70.00

Receipt for

☐ Primary ☒ General ☐ Other

☐ Check ☐ Contributor is self-employed

Aggregate Year To Date \$ 17,120

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Occupation

Date (month,  
 day, year)

10/2/78

Amount of each Receipt  
 this Period

\$ 110.00

Receipt for

☐ Primary ☒ General ☐ Other

☐ Check ☐ Contributor is self-employed

Aggregate Year To Date \$

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Occupation

Date (month,  
 day, year)

Amount of each Receipt  
 this Period

Receipt for

☐ Primary ☒ General ☐ Other

☐ Check ☐ Contributor is self-employed

Aggregate Year To Date \$

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Occupation

Date (month,  
 day, year)

Amount of each Receipt  
 this Period

**CUSTOTAL** of receipts this page (optional)

**TOTAL** this period (last page this line number only)

\$

\$ 4,173.00

79040113817  
 78020170613



FEDERAL ELECTION COMMISSION

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

November 3, 1978

Mr. Michael Biddinger  
Treasurer  
Larry Williams for U.S. Senate  
P.O. Box 1978  
Great Falls, Montana 59401

Re: MUR 780

Dear Mr. Biddinger:

I am forwarding for your information the enclosed complaint which was received by the Commission.

The Commission has determined that there is no reason to believe that your committee has violated the Federal Election Campaign Act with regard to those matters raised in the complaint. Accordingly, the Commission intends to close its file in this matter insofar as it concerns the Larry Williams for U.S. Senate Committee.

Should you have any questions, please contact Vincent J. Convery, Jr., the Commission attorney assigned to this matter, at 202-523-4060.

Sincerely,

*William C. Oldaker*

William C. Oldaker  
General Counsel

USC  
11/2/78

Enclosure

79040113813

MUR 780 (78)

VIA TELEGRAM

Transmitted to Western Union on November 2, 1978 at 1:00 p.m.

Herb Williams  
28 Neill Avenue  
Helena, Montana 59601  
on behalf of  
Larry Williams For U.S. Senate Committee

The Commission has received a complaint from the National Committee for an Effective Congress which alleges that you have violated 2 U.S.C. §441a(d) of the Federal Election Campaign Act.

The Commission has determined that there is no reason to believe that your committee has violated the Federal Election Campaign Act with regard to those matters raised in the complaint. Accordingly, the Commission intends to close its file in this matter insofar as it concerns the Larry Williams for U.S. Senate Committee.

A letter and copy of the complaint will follow.

Sincerely,

William C. Oldaker  
General Counsel

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
National Republican Senatorial )  
Committee )  
Larry Williams for U. S. Senate )  
Committee )

MUR 780

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on November 2, 1978, the Commission, meeting in Executive Session at which a quorum was present, determined by a vote of 6-0 to take the following actions in MUR 780:

1. Refer the matter to the Reports Analysis Division for review, and make no finding with respect to the alleged violation of 2 U.S.C. §441a(d) by the National Republican Senatorial Committee.
2. Find no reason to believe that the Williams for U. S. Senate Committee violated the FECA as alleged in the complaint.
3. Authorize the sending of the letter to the Williams for U. S. Senate Committee attached to the General Counsel's Report.

Attest:

11/2/78

Date

Marjorie W. Emmons  
Marjorie W. Emmons  
Secretary to the Commission

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. 780  
DATE COMPLAINT RECEIVED  
BY OGC Oct. 30, 1978  
STAFF  
MEMBER Convery

SOURCE: National Committee for an Effective Congress  
(Walter K. Moore, Washington Director)

RESPONDENT'S NAME: 1. National Republican Senatorial Committee  
2. Larry Williams for U.S. Senate Committee (Montana)

RELEVANT STATUTE: 2 U.S.C. §441a(d)

INTERNAL REPORTS CHECKED: Reports of Receipts and Expenditures

FEDERAL AGENCIES CHECKED: None

BACKGROUND

In a notarized complaint dated October 26, 1978, it was alleged that the Williams for U.S. Senate Committee had received financial assistance from the National Republican Senatorial Committee in an aggregate amount which exceeded the limits set out in the FECA.

Specifically, it was alleged that the NRSC had expended \$51,590 in behalf of the Williams Committee, when, as agent of the Republican National Committee, it should have been limited by Section 441a(d) of the Act to making expenditures of \$24,580 in behalf of that Committee.

The complainant states that, in spending money in excess of the lawful limit, NRSC apparently misinterpreted its authority under Section 441a(d) to make expenditures as an agent both for the Montana Republican State Party and for the Republican National Committee.

## DISCUSSION:

2 U.S.C. §441a(d)(1) provides that the national committee of a political party and a State committee of a political party, including any subordinate committee of a State committee, may make expenditures in connection with the general election campaign of candidates for Federal office. These "441a(d)" expenditures are counted neither as contributions to the candidate nor as expenditures by the candidate or his authorized committees.

2 U.S.C. §441a(d)(3) establishes the limitations on such expenditures. In the case of a Senatorial candidate the limitations are expressed in the following formula: State Voting Age Population x \$0.02, plus the 1978 increase in the Consumer Price Index of 22.9 per cent; or \$24,580.00, whichever is greater. For a Montana Senatorial general election, the limitation on party spending, therefore, is \$24,580.00 each for the State committee and the National committee.

Commission Regulation Section 110.7 is that part of the Regulations which construe 2 U.S.C. §441a(d). Subsection (a)(4) of that regulation specifically grants to the National committee of a political party the authority to make the expenditures authorized by Section 110.7 (which include expenditures in connection with the general election campaign of a candidate for Federal office) through any designated agent.

The Regulations contain no similar specific grant of authority in the case of a State committee. On the other hand, neither do the Regulations contain a provision which prohibits a State committee from designating an agent for 441a(d) expenditure purposes.

It appears that in this case, both the Republican National Committee and the Montana State Republican Committee designated the National Republican Senatorial Committee as their agent for the purpose of making 441a(d) expenditures to the Williams Committee. (See Excerpt from NRSC's October, 1978, monthly report of receipts and expenditures, Attachment E-G to complaint).

Considering the absence of any specific prohibition, we conclude that the action of the Montana Republican State Committee in designating NRSC as their 441a(d) agent was not improper.

We recognize that a possible result of the State Committee's designation of NRSC is that, in connection with the Williams campaign, NRSC is able to expend from its own resources an amount twice as great as its own 441a(d) limitation.

In this regard see Advisory Opinion 1976-108. In that proceeding, the Commission dealt with the following issue: Whether an agency arrangement (established for 441a(d) purposes) requires the agent to expend funds which belong to the principal or whether the agent may be authorized by the principal to expend funds owned by the agent.

Under the facts set out in that AO Request, both committees (i.e., both the "principal" and the "agent") were committees of their national political party. Unlimited transfers of money between them would have been allowed under 2 U.S.C. §441a(a)(4). The Commission concluded, therefore, that since funds could be transferred between the committees without limitation, it was immaterial as to which committee's funds were being expended under 2 U.S.C. §441a(d)(3).

We believe that the same rationale applies in the matter now under consideration. Since 2 U.S.C. §441a(a)(4) also permits unlimited transfer of funds between and among political committees which are national and State committees of the same political party, it would appear to be immaterial as to which committee's funds were being expended under 2 U.S.C. §441a(d)(3).

We conclude then, that as agent for both the Montana Republican State Committee and the Republican National Committee, the respondent NRSC is limited to making \$49,160 in 441a(d) expenditures in connection with the Larry Williams for U.S. Senate Committee.

This conclusion leads to the second major allegation raised in the complaint: that NRSC expended, and the Williams Committee benefitted from, an amount greater than \$49,160.

Reports of receipts & expenditures filed by the National Republican Senatorial Committee reflect that "Itemized Coordinated Expenditures" made in behalf of the Williams Committee totalled \$51,590 in 1978. (A review of the reports did not indicate that any refunds had been made to NRSC).

We believe this evidence supports a finding of reason to believe that NRSC exceeded its \$49,160 limitation on expenditures as set out in 2 U.S.C. §441a(d).

We note that there is nothing in the Act or in the Regulations which specifically prohibits the Williams Committee from "benefitting" from NRSC's excessive expenditures. Therefore, we will recommend that the Commission find no reason to believe that the Williams Committee violated the Act, as alleged in the complaint.

**RECOMMENDATION:**

It is recommended that the Commission:

1. Find reason to believe that the National Republican Senatorial Committee violated 2 U.S.C. §441a(d).
2. Find no reason to believe that the Williams for U.S. Senate Committee violated the FECA as alleged in the complaint.
3. Authorize the sending of the attached letters.

**ATTACHMENTS:**

1. Complaint with attachments
2. Proposed letter to NRSC
3. Proposed letter to Williams for U.S. Senate Committee



FEDERAL ELECTION COMMISSION

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

October 31, 1978

Walter K. Moore  
Washington Director  
The National Committee for an  
Effective Congress  
505 C Street, N.E.  
Washington, D.C. 20002

Dear Mr. Moore:

This is to acknowledge receipt of your complaint of October 26, 1978, alleging violations of the Federal Election Campaign laws. A staff member has been assigned to analyze your allegations. A recommendation to the Federal Election Commission as to how this matter should be handled will be made shortly. You will be notified as soon as the Commission determines what action should be taken. For your information, we have attached a brief description of the Commission's preliminary procedures for handling complaints.

Sincerely,

A handwritten signature in dark ink, which appears to read "Lester N. Scall", is written over the word "Sincerely,".

Lester N. Scall  
Assistant General Counsel

Enclosure

79040113825



# NCEC

THE NATIONAL COMMITTEE FOR AN EFFECTIVE CONGRESS

G.O. # 5297. MUR 780  
make copy  
delivered

October 26, 1978

Mr. William Oldaker  
General Counsel  
Federal Election Commission  
1325 K Street N.W.  
Washington D.C. 20463

Dear Mr. Oldaker,

The National Committee for an Effective Congress ("NCEC"), a political committee registered with the Federal Election Commission, files this complaint alleging violations of the Federal Election Campaign Act ("The Act") by the Larry Williams for U.S. Senate Committee ("The Williams Committee") and the National Republican Senatorial Committee ("NRSC"). The Williams Committee is the principal campaign committee of Larry Williams, the Republican nominee for the United States Senate in Montana. As set forth below, together with the supporting documentation, NCEC believes that the Williams Committee has received financial assistance from the NRSC in aggregate amounts exceeding the lawful limits under the FECA.

Specifically, NCEC alleges that the Williams Committee has benefitted unlawfully from the \$51,590 in expenditures made on its behalf by NRSC pursuant to 441a(d) of the Act. As agent for the Republican National Committee ("RNC") NRSC may make expenditures on behalf of Williams in the Montana Senate election totalling only \$24,580 -- or less than half the amount actually spent so far. It appears that in spending moneys in excess of the lawful limit, NRSC is relying on a serious misreading of its authority under 441a(d) to make expenditures as an agent for the Montana Republican state party committee, as well as for the Republican National Committee. As a result, vast sums of unlawful money are currently being spent by NRSC to influence the Montana Senate election.

NCEC believes that these allegations require the Commission's urgent attention. Action is required now to preserve the integrity of the electoral process in Montana, and to insure that comparable violations by NRSC and State Party committees are not occurring in other Senate elections throughout the country.

The \$51,590 in 441a(d) Expenditures Made By NRSC On Behalf Of The Williams Committee.

Throughout the current Senate campaign in Montana, the NRSC has been generous with financial assistance to the Williams Committee. In addition to at least \$10,000 in direct contributions, see Appendix A, the NRSC has made \$51,590.00 in expenditures under 441a(d) on behalf of the Williams candidacy. See Appendix B. The 441a(d) expenditures made by the NRSC clearly violate the limits applicable under that section to the Montana Senate election.

In the first instance it must be noted that the FEC has calculated a 441a(d) expenditure limit for the Montana Senate election of \$24,580. Under 441a(d), the national and state party committees may each spend this amount on behalf of Senate candidates, for possible total party expenditures of \$49,160. By spending \$51,590 so far on behalf of the Williams campaign, the NRSC has spent \$2,430 more than the total expenditures authorized for national and state committees under 441a(d). Apart from any question of its authority to expend 441a(d) monies on behalf of both national and state committees, the NRSC has exceeded the lawful limit under any theory.

Yet it is apparently the theory of NRSC that is entitled to take full advantage of the expenditure limits of both national and state party committees under 441a(d). The pre-election report of NRSC, filed October 20, 1978, explains on schedule F ("Itemized Coordinated Expenditures made by Political Party Committees or Designated Agents....") that it has been designated by the "Republican National and/or Respective State Committees" to make expenditures under 441a(d) on behalf of federal candidates. Thus the NRSC apparently assumes that as the claimed designee of both the RNC and Montana state committee, it can utilize the combined expenditure limits of both these committees, or a full \$49,160. It is known that under the FEC's Advisory Opinion 1976-108, a congressional campaign committee, such as NRSC, may arrange a designation with the national party committee, and that therefore the NRSC is allowed to make a maximum \$24,580 in 441a(d) expenditures as RNC's agent. But no similar FEC approval has been given to any 441a(d) designation of NRSC by a state party committee, such as the Montana Republican State Committee. Yet with this added designation, the NRSC has equipped itself with massive new spending power, all of it fueled with moneys raised nationally.

NCEC believes that NRSC has twisted the intended purposes of 441a(d), as well as AO 1976-108, in an attempt to arrogate unto itself this vast new spending power. As NCEC understand it, 441a(d) provides special spending limits for national and state parties as a means of assuring their continued vitality and importance. AO 1976-108 simply acknowledges that congressional campaign committees are "committees of their respective national political parties", (emphasis added) and should be permitted therefore to act as agents of the national party committees for 441a(d) purposes. Neither 441a(d), nor AO 1976-108, suggests that a congressional campaign committee may latch on to a state party committee's limits under 441a(d), as under 441a(d), as is the case here. In lieu of serving as a party-strengthening device, 441a(d) thereby becomes a loophole for increased NRSC spending -- without any use state party funds, or any state party participation in fund raising efforts. The result is NRSC-strengthening only, and a combined spending limit in Montana, including both contributions and expenditures, of \$66,660.\* In other states with Senate

\* The crudity of the 441a(d) tactic involved here is underscored by the manner in which NRSC has reported it. NRSC reports a variety of 441a(d) expenditures, including the \$51,590 spent on behalf of Williams, but never attributes any specific expenditure to the limit of either the national or state party committees. NRSC simply proclaims itself "designee" at the outset, and then proceeds to spend up to (and in the case of Montana, beyond) the combined limit of the two party committees. Thus the "designation" device, clothed in agency principles, is revealed for what it is -- a sham transaction to confer upon a congressional campaign committee the greatest spending power of any political committee in the country.

faces this year, NRSC's use of 441a(d) would allow for special spending limits for that committee as follows:

| <u>State</u>  | <u>Combined Contribution<br/>and Expenditure Limit **</u> |
|---------------|-----------------------------------------------------------|
| Colorado      | \$107,364.48                                              |
| Illinois      | \$404,536.68                                              |
| Iowa          | \$117,049.00                                              |
| Kansas        | \$ 99,302.24                                              |
| Massachusetts | \$222,300.56                                              |
| Michigan      | \$326,421.44                                              |
| New Jersey    | \$274,311.84                                              |
| Tennessee     | \$166,356.48                                              |
| Texas         | \$448,780.68                                              |

With these abundant monies, NRSC can mount in all these states, what it has already mounted in Montana: a lavish media campaign, including expensive television and newspaper advertising. The Act did not contemplate that such moneys would be available through a single campaign committee located in Washington D.C., raising its money nationally, and acting in the name of both the party's national committee, and the party committee in each of the fifty states. This is a serious violation of law requiring immediate Commission action, both to remedy the current violation in Montana, and to insure that no similar violations are occurring in other Senate campaigns around the country.

Sincerely,



Walter K. Moore  
Washington Director

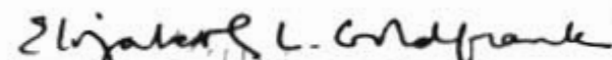
\*\* It is assumed that the NRSC is designated as agent for both the national and state committees, and has full use of both national and state expenditure limits. It is also assumed that the NRSC would have full use of the \$17,500 Senate contribution limit under 441a (h).

WKM/ebw

District of Columbia, ss:

Signed and sworn to before me on this 26th day  
of October, 1978.

My commission expires 1/1/82

  
Notary Public

REPORTED CONTRIBUTIONS FROM NRSC TO  
THE WILLIAMS COMMITTEE.  
ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind,  
Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a  
of FEC FORM 3

Page 1 of 1 to  
Line Number 15

(Use Separate Schedules for  
each numbered line)

Name of Candidate or Committee in Full

LARRY WILLIAM FOR U.S. SENATE

|                                                                                                                                                |                                                                                                           |                                       |                                                     |
|------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------|---------------------------------------|-----------------------------------------------------|
| Full Name, Mailing Address and ZIP Code<br>NATIONAL REPUBLICAN<br>SENATORIAL COMMITTEE<br>227 MASSACHUSETTS AVE N.E.<br>WASHINGTON, D.C. 20007 | Principal Place of Business<br>SAME                                                                       | Date (month,<br>day, year)<br>2/20/76 | Amount of each Receipt<br>this Period<br>\$ 5000.00 |
| Receipt for:<br><input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other                    | <input type="checkbox"/> Check if Contributor is self-employed<br>Aggregate Year-To-Date . . . \$ 5000.00 |                                       |                                                     |
| Full Name, Mailing Address and ZIP Code                                                                                                        | Principal Place of Business                                                                               | Date (month,<br>day, year)            | Amount of each Receipt<br>this Period               |
|                                                                                                                                                | Occupation                                                                                                |                                       |                                                     |
| Receipt for:<br><input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other                               | <input type="checkbox"/> Check if Contributor is self-employed<br>Aggregate Year-To-Date . . . \$         |                                       |                                                     |
| Full Name, Mailing Address and ZIP Code                                                                                                        | Principal Place of Business                                                                               | Date (month,<br>day, year)            | Amount of each Receipt<br>this Period               |
|                                                                                                                                                | Occupation                                                                                                |                                       |                                                     |
| Receipt for:<br><input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other                               | <input type="checkbox"/> Check if Contributor is self-employed<br>Aggregate Year-To-Date . . . \$         |                                       |                                                     |
| Full Name, Mailing Address and ZIP Code                                                                                                        | Principal Place of Business                                                                               | Date (month,<br>day, year)            | Amount of each Receipt<br>this Period               |
|                                                                                                                                                | Occupation                                                                                                |                                       |                                                     |
| Receipt for:<br><input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other                               | <input type="checkbox"/> Check if Contributor is self-employed<br>Aggregate Year-To-Date . . . \$         |                                       |                                                     |
| Full Name, Mailing Address and ZIP Code                                                                                                        | Principal Place of Business                                                                               | Date (month,<br>day, year)            | Amount of each Receipt<br>this Period               |
|                                                                                                                                                | Occupation                                                                                                |                                       |                                                     |
| Receipt for:<br><input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other                               | <input type="checkbox"/> Check if Contributor is self-employed<br>Aggregate Year-To-Date . . . \$         |                                       |                                                     |
| Full Name, Mailing Address and ZIP Code                                                                                                        | Principal Place of Business                                                                               | Date (month,<br>day, year)            | Amount of each Receipt<br>this Period               |
|                                                                                                                                                | Occupation                                                                                                |                                       |                                                     |
| Receipt for:<br><input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other                               | <input type="checkbox"/> Check if Contributor is self-employed<br>Aggregate Year-To-Date . . . \$         |                                       |                                                     |
| Full Name, Mailing Address and ZIP Code                                                                                                        | Principal Place of Business                                                                               | Date (month,<br>day, year)            | Amount of each Receipt<br>this Period               |
|                                                                                                                                                | Occupation                                                                                                |                                       |                                                     |
| Receipt for:<br><input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other                               | <input type="checkbox"/> Check if Contributor is self-employed<br>Aggregate Year-To-Date . . . \$         |                                       |                                                     |

SUBTOTAL of receipts this page (optional)

TOTAL this period (last page this line number only)

\$ 5000.00  
\$ 5000.00

## ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind,  
Other Income, Loans, Refunds)Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a  
of FEC FORM 3Page 1 of 1  
Line Number 15AState Separate Schedule, for  
each jurisdiction

Name of Candidate or Committee in Full

LARRY WILLIAMS FOR U.S. SENATE

Full Name, Mailing Address and ZIP Code

NATIONAL REPUBLICAN  
SENATORIAL COMMITTEE  
227 MASSACHUSETTS AVE  
WASHINGTON, D.C. 20007

Principal Place of Business

Occupation

Date (month,  
day, year)Amount of each receipt  
this Period

6/14/78

\$5000.00

Receipt for

☐ Primary ☒ General ☐ Other☐ Check if Contributor is self-employed

Aggregate Year To Date \$

Full Name, Mailing Address and ZIP Code

ROWEN RIVER REPUBLICAN  
CENTRAL COMMITTEE

Principal Place of Business

Occupation

Date (month,  
day, year)Amount of each receipt  
this Period

6/20/78

\$50.00

Receipt for

☐ Primary ☐ General ☐ Other☐ Check if Contributor is self-employed

Aggregate Year To Date \$

Full Name, Mailing Address and ZIP Code

SAUNDERS COUNTY REPUBLICAN  
CENTRAL COMMITTEE

Principal Place of Business

Occupation

Date (month,  
day, year)Amount of each receipt  
this Period

6/20/78

\$250.00

Receipt for

☐ Primary ☐ General ☐ Other☐ Check if Contributor is self-employed

Aggregate Year To Date \$

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Occupation

Date (month,  
day, year)Amount of each receipt  
this Period

Receipt for

☐ Primary ☐ General ☐ Other☐ Check if Contributor is self-employed

Aggregate Year To Date \$

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Occupation

Date (month,  
day, year)Amount of each receipt  
this Period

Receipt for

☐ Primary ☐ General ☐ Other☐ Check if Contributor is self-employed

Aggregate Year To Date \$

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Occupation

Date (month,  
day, year)Amount of each receipt  
this Period

Receipt for

☐ Primary ☐ General ☐ Other☐ Check if Contributor is self-employed

Aggregate Year To Date \$

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Occupation

Date (month,  
day, year)Amount of each receipt  
this Period

Receipt for

☐ Primary ☐ General ☐ Other☐ Check if Contributor is self-employed

Aggregate Year To Date \$

SUBTOTAL (Receipts this page (optional))

\$ 5300.00

TOTAL (Receipts this line number only)

\$ 5300.00

APPENDIX B REPORTED 441a(d) EXPENDITURES MADE BY NRSC  
ON BEHALF OF THE WILLIAMS COMMITTEE.

Form 3  
January, 1978  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

FOR A CANDIDATE OR COMMITTEE  
SUPPORTING CANDIDATE FOR FEDERAL  
NOMINATION OR ELECTION TO FEDERAL OFFICE  
EXCEPT FOR CANDIDATES OR COMMITTEES RECEIVING FEDERAL MATCHING FUNDS

Name: Committee authorized by a candidate to receive contributions and make expenditures in connection with the nomination or election must maintain separate records with respect to each election.

**National Republican Senatorial Committee-** ID No. **C00037455**  
Name of Candidate or Committee in full **Expenditures**  
**227 Massachusetts Ave., N.E.**  
Address (number and street)  
**Washington, D.C. 20002**  
City, State and ZIP Code  
Office Sought, State/District if applicable  
Year of Election

4 Type of Report (check appropriate boxes)

- ☐ April 10 Quarterly Report  
☐ July 10 Quarterly Report  
☐ October 10 Quarterly Report  
☐ January 31 Annual Report  
☒ Monthly Report September on \_\_\_\_\_ in the State of \_\_\_\_\_  
(month) (date)
- ☐ Tenth day report preceding \_\_\_\_\_ election  
(primary, general or convention)  
on \_\_\_\_\_ in the State of \_\_\_\_\_  
(date)
- ☐ Thirtieth day report following \_\_\_\_\_ election  
(primary, general or convention)  
(which report)
- ☐ Termination Report  
☐ Amendment for \_\_\_\_\_
- This is a report for ☐ Primary Election ☐ General Election ☒ Primary and General ☐ Other (special, runoff, etc.)

SUMMARY OF RECEIPTS AND EXPENDITURES  
(Figures may be rounded to nearest dollar.)

| 5 Covering Period                                                                    | Column A<br>This Period | Column B<br>Calendar Year To Date |
|--------------------------------------------------------------------------------------|-------------------------|-----------------------------------|
| <u>Sept. 1</u> Through <u>Sept. 30</u> , 1978                                        |                         |                                   |
| 6 Cash on hand January 1, 78                                                         |                         | \$1,464,884.95                    |
| 7 Cash on hand at beginning of reporting period                                      | \$ 362,115.85           |                                   |
| 8 Total receipts (from line 19)                                                      | \$1,361,694.51          | \$4,878,495.12                    |
| (a) Subtotal (Add lines 7 and 8 for Column A and lines 6 and 8 for Column B)         | \$1,723,810.36          | \$6,343,380.07                    |
| 9 Total expenditures (from line 25)                                                  | \$1,195,417.80          | \$5,814,987.51                    |
| 10 Cash on hand at close of reporting period (Subtract line 9 from line 8a)          | \$ 528,392.56           | \$ 528,392.56                     |
| 11 Value of contributed items on hand to be liquidated<br>(Attach itemized list)     | \$                      |                                   |
| 12 Debts and obligations owed to the Committee/Candidate (itemize all on Schedule C) | \$                      |                                   |
| 13 Debts and obligations owed by the Committee/Candidate (itemize all on Schedule C) | \$                      |                                   |

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

October 20, 1978  
(Date)

Rodney A. Smith, Treasurer  
(Typed Name of Treasurer or Candidate)

*Rodney A. Smith*  
(Signature of Treasurer or Candidate)

Note: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. Section 437g or Section 481j (see reverse side of form).

For further  
information,  
Contact:

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

or call 800/424-9630

Approved by GAO  
8 18 7630 (R0508)  
Expires 3-31-81

All previous versions of FEC FORM 3 are obsolete and should no longer be used.

Any information reported herein may not be copied for sale or use by any person for purposes of soliciting contributions or for any commercial purpose.

(To be used only by Political Committee in the General Election)

| Name of Political Committee in Full                                                                |                                                                      |                            |                         |              |
|----------------------------------------------------------------------------------------------------|----------------------------------------------------------------------|----------------------------|-------------------------|--------------|
| National Republican Senatorial Committee                                                           |                                                                      |                            |                         |              |
| Has your Committee been designated to make authorized expenditures by a political party committee? |                                                                      |                            |                         |              |
| <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO                                |                                                                      |                            |                         |              |
| If YES, name the designated committee:                                                             |                                                                      |                            |                         |              |
| Republican National and/or Representative State Committees                                         |                                                                      |                            |                         |              |
| Full Name, Mailing Address and ZIP Code of Each Payee                                              | Name of Federal Candidate Supported, State, District & Office Sought | Particulars of Expenditure | Date (month, day, year) | Amount       |
| Wendt Advertising<br>P. O. Box 2128<br>Great Falls, Montana 59403                                  | Williams for Senate<br>Montana                                       | Media Advertising          | 9-6-78                  | \$ 10,000.00 |
| Aggregate General Election Expenditure for the Candidate - \$                                      |                                                                      |                            |                         |              |
| Full Name, Mailing Address and ZIP Code of Each Payee                                              | Name of Federal Candidate Supported, State, District & Office Sought | Particulars of Expenditure | Date (month, day, year) | Amount       |
| Ruth Jones, Ltd.<br>123 East 75th Street<br>New York, New York 10021                               | Bell for Senate Comm.<br>New Jersey                                  | Media Advertising          | 9-6-78                  | 25,000.00    |
| Aggregate General Election Expenditure for the Candidate - \$                                      |                                                                      |                            |                         |              |
| Full Name, Mailing Address and ZIP Code of Each Payee                                              | Name of Federal Candidate Supported, State, District & Office Sought | Particulars of Expenditure | Date (month, day, year) | Amount       |
| Envelopes Unlimited, Inc.<br>649 N. Horners Lane<br>Rockville, Maryland 20850                      | Durenberger for Senate<br>Minnesota                                  | Envelopes                  | 9-7-78                  | 191.82       |
| Aggregate General Election Expenditure for the Candidate - \$                                      |                                                                      |                            |                         |              |
| Full Name, Mailing Address and ZIP Code of Each Payee                                              | Name of Federal Candidate Supported, State, District & Office Sought | Particulars of Expenditure | Date (month, day, year) | Amount       |
| Communication Specialists, Inc.<br>P. O. Box 1529<br>Austin, Texas 78767                           | Texas for Tower<br>Texas                                             | Printing services          | 9-11-78                 | 52,180.07    |
| Aggregate General Election Expenditure for the Candidate - \$                                      |                                                                      |                            |                         |              |
| Full Name, Mailing Address and ZIP Code of Each Payee                                              | Name of Federal Candidate Supported, State, District & Office Sought | Particulars of Expenditure | Date (month, day, year) | Amount       |
| J. Bruce Hildebrand<br>192 Twigg Corner<br>Peachtree City, Georgia 30269                           | Bell for Senate Comm.<br>New Jersey                                  | Political Consulting       | 9-8-78                  | 2,500.00     |
| Aggregate General Election Expenditure for the Candidate - \$                                      |                                                                      |                            |                         |              |
| SUBTOTAL of expenditures this page (addend):                                                       |                                                                      |                            |                         | \$           |
| TOTAL this period from page one (no number only):                                                  |                                                                      |                            |                         | \$           |

79020151318



(To be used only by Political Committees in the General Election)

Name of Political Committee in Full

**National Republican Senatorial Committee-Expenditures**

Has your Committee been designated to make coordinated expenditures by a primary party committee?

☒ YES

☐ NO

If YES, name the designating committee:

**Republican National and/or Representative State Committees**

| Full Name, Mailing Address and ZIP Code of Each Payee                                    | Name of Federal Candidate Supported, State, District & Office Sought | Purpose(s) of Expenditure | Date Disbursed, day, month, year | Amount      |
|------------------------------------------------------------------------------------------|----------------------------------------------------------------------|---------------------------|----------------------------------|-------------|
| Baxter for Senate<br>Suite #62<br>Independence Mall<br>Wilmington, Delaware<br>19803     | Jim Baxter<br>U. S. Senate<br>Delaware                               | Sec. 441<br>Contribution  | 9-13-78                          | \$ 5,000.00 |
| Aggregate General Election Expenditure for this Candidate - \$                           |                                                                      |                           |                                  |             |
| Full Name, Mailing Address and ZIP Code of Each Payee                                    | Name of Federal Candidate Supported, State, District & Office Sought | Purpose(s) of Expenditure | Date Disbursed, day, month, year | Amount      |
| R. J. Senn & Associates<br>630 9th Avenue<br>New York, New York 10036                    | Kansens for Kassebaum<br>Kansas                                      | Media Advertising         | 9-18-78                          | 15,000.00   |
| Aggregate General Election Expenditure for this Candidate - \$                           |                                                                      |                           |                                  |             |
| Full Name, Mailing Address and ZIP Code of Each Payee                                    | Name of Federal Candidate Supported, State, District & Office Sought | Purpose(s) of Expenditure | Date Disbursed, day, month, year | Amount      |
| Wendt Advertising<br>P. O. Box 2128<br>Great Falls, Montana<br>59403                     | Williams for Senate<br>Montana                                       | Media Advertising         | 9-18-78                          | 6,450.00    |
| Aggregate General Election Expenditure for this Candidate - \$                           |                                                                      |                           |                                  |             |
| Full Name, Mailing Address and ZIP Code of Each Payee                                    | Name of Federal Candidate Supported, State, District & Office Sought | Purpose(s) of Expenditure | Date Disbursed, day, month, year | Amount      |
| Smith and Harroff, Inc.<br>922 Pennsylvania Ave., SE<br>Washington, D.C. 20003           | Cohen for Senator<br>Maine                                           | Film Production           | 9-19-78                          | 9,495.35    |
| Aggregate General Election Expenditure for this Candidate - \$                           |                                                                      |                           |                                  |             |
| Full Name, Mailing Address and ZIP Code of Each Payee                                    | Name of Federal Candidate Supported, State, District & Office Sought | Purpose(s) of Expenditure | Date Disbursed, day, month, year | Amount      |
| Northwest Teleproductions, Inc.<br>4455 West 77th St.<br>Minneapolis, Minnesota<br>55435 | Durenberger for Senate<br>Minnesota                                  | Media Advertising         | 9-19-78                          | 5,000.00    |
| Aggregate General Election Expenditure for this Candidate - \$                           |                                                                      |                           |                                  |             |

SUBTOTAL of expenditures this page (optional) .....

\$

TOTAL this period (last page this line number only) .....

\$

79820151324

(To be used only by Political Committees in the General Election)

Name of Political Committee in Full

**National Republican Senatorial Committee-Expenditures**

Has your Committee been designated to make disbursements by a political party committee?

☒ YES

☐ NO

If YES, name the committee(s):

**Republican National and/or respective State Committee**

| Full Name, Mailing Address and ZIP Code of Each Payor                                | Name of Federal Candidate Supported, State, District & Office Sought | Particulars of Expenditure | Date Disbursed, day, month, year | Amount    |
|--------------------------------------------------------------------------------------|----------------------------------------------------------------------|----------------------------|----------------------------------|-----------|
| Institutional Sales, Inc.<br>2295 University Ave.<br>St. Paul, Minnesota 55114       | Durenberger for Senate<br>Minnesota                                  | Office furnishings         | 9-27-78                          | \$ 338.00 |
| Aggregate General Election Expenditure for this Candidate - \$                       |                                                                      |                            |                                  |           |
| Full Name, Mailing Address and ZIP Code of Each Payor                                | Name of Federal Candidate Supported, State, District & Office Sought | Particulars of Expenditure | Date Disbursed, day, month, year | Amount    |
| Mayers & Associates, Inc.<br>12101 - 12th Ave., South<br>Burnsville, Minnesota 55337 | Durenberger for Senate<br>Minnesota                                  | Printing services          | 9-27-78                          | 1,642.07  |
| Aggregate General Election Expenditure for this Candidate - \$                       |                                                                      |                            |                                  |           |
| Full Name, Mailing Address and ZIP Code of Each Payor                                | Name of Federal Candidate Supported, State, District & Office Sought | Particulars of Expenditure | Date Disbursed, day, month, year | Amount    |
| Roger Ailes & Associates<br>230 Central Park South<br>New York, New York 10019       | Durenberger for Senate<br>Minnesota                                  | Media Consulting           | 9-27-78                          | 11,000.00 |
| Aggregate General Election Expenditure for this Candidate - \$                       |                                                                      |                            |                                  |           |
| Full Name, Mailing Address and ZIP Code of Each Payor                                | Name of Federal Candidate Supported, State, District & Office Sought | Particulars of Expenditure | Date Disbursed, day, month, year | Amount    |
| Wendt Advertising<br>P. O. Box 2128<br>Great Falls, Montana 59403                    | Williams for Senate<br>Montana                                       | Media Advertising          | 9-27-78                          | 25,000.00 |
| Aggregate General Election Expenditure for this Candidate - \$                       |                                                                      |                            |                                  |           |
| Full Name, Mailing Address and ZIP Code of Each Payor                                | Name of Federal Candidate Supported, State, District & Office Sought | Particulars of Expenditure | Date Disbursed, day, month, year | Amount    |
| Envelopes Unlimited, Inc.<br>649 N. Horners Lane<br>Rockville, MD 20850              | Citizens for Cochran<br>Mississippi                                  | Envelope Stock             | 9-27-78                          | 549.70    |
| Aggregate General Election Expenditure for this Candidate - \$                       |                                                                      |                            |                                  |           |
| <b>SUBTOTAL of expenditures this page (forward).</b>                                 |                                                                      |                            |                                  | <b>\$</b> |
| <b>TOTAL, this period from page this line number only.</b>                           |                                                                      |                            |                                  | <b>\$</b> |

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POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S)  
ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE  
(2 U.S.C. 441a(d))  
(Supporting Line 24, FEC Form 3)

Page 2 of 2  
Filing Date: 7-17-78

(To be used only by Political Committees in the General Election)

Name of Political Committee in Full

National Republican Senatorial Committee-Expenditures

Political Committee has designated to make coordinated expenditures by a political party committee

YES ☒ NO ☐

YES Name of the political committee

Republican National Committee

| Name, mailing address and ZIP Code of each donor                            | Name of Federal Candidate Supported<br>State, District & Office Sought | Particulars of Expenditure | Date Deposited<br>Day, Month, Year | Amount    |
|-----------------------------------------------------------------------------|------------------------------------------------------------------------|----------------------------|------------------------------------|-----------|
| The Swartz Company<br>1175 Amelia Street<br>New Orleans, Louisiana<br>70115 | Citizens for Cochran<br>for Senate-Mississippi                         | Media Advertising          | 7-11-78                            | \$ 31,000 |

Appropriation of Expenditure  
to the Candidate

| Name, mailing address and ZIP Code of each donor | Name of Federal Candidate Supported<br>State, District & Office Sought | Particulars of Expenditure | Date Deposited<br>Day, Month, Year | Amount |
|--------------------------------------------------|------------------------------------------------------------------------|----------------------------|------------------------------------|--------|
|--------------------------------------------------|------------------------------------------------------------------------|----------------------------|------------------------------------|--------|

|                                                                                   |                                                |                         |         |          |
|-----------------------------------------------------------------------------------|------------------------------------------------|-------------------------|---------|----------|
| Bill Lee<br>1116 N. 2nd<br>1718 Jefferson Davis Hwy.<br>Arlington, Virginia 22202 | Citizens for Cochran<br>for Senate-Mississippi | Political<br>Consulting | 7-11-78 | \$ 1,000 |
|-----------------------------------------------------------------------------------|------------------------------------------------|-------------------------|---------|----------|

Appropriation of Expenditure  
to the Candidate

| Name, mailing address and ZIP Code of each donor | Name of Federal Candidate Supported<br>State, District & Office Sought | Particulars of Expenditure | Date Deposited<br>Day, Month, Year | Amount |
|--------------------------------------------------|------------------------------------------------------------------------|----------------------------|------------------------------------|--------|
|--------------------------------------------------|------------------------------------------------------------------------|----------------------------|------------------------------------|--------|

|                                                                                                      |                                        |       |         |    |
|------------------------------------------------------------------------------------------------------|----------------------------------------|-------|---------|----|
| Deanna J. Taylor, Information<br>101 N. 1st<br>1718 N. Main Street<br>Santa Ana, California<br>92701 | President for Senate -<br>South Dakota | \$100 | 7-11-78 | \$ |
|------------------------------------------------------------------------------------------------------|----------------------------------------|-------|---------|----|

Appropriation of Expenditure  
to the Candidate

| Name, mailing address and ZIP Code of each donor | Name of Federal Candidate Supported<br>State, District & Office Sought | Particulars of Expenditure | Date Deposited<br>Day, Month, Year | Amount |
|--------------------------------------------------|------------------------------------------------------------------------|----------------------------|------------------------------------|--------|
|--------------------------------------------------|------------------------------------------------------------------------|----------------------------|------------------------------------|--------|

|                                                                                       |                                         |       |         |    |
|---------------------------------------------------------------------------------------|-----------------------------------------|-------|---------|----|
| Arthur J. Finkelschein &<br>Associates<br>11 Third Street<br>New York, New York 10003 | Memorial for U. S.<br>Senate - Virginia | \$100 | 7-11-78 | \$ |
|---------------------------------------------------------------------------------------|-----------------------------------------|-------|---------|----|

Appropriation of Expenditure  
to the Candidate

| Name, mailing address and ZIP Code of each donor | Name of Federal Candidate Supported<br>State, District & Office Sought | Particulars of Expenditure | Date Deposited<br>Day, Month, Year | Amount |
|--------------------------------------------------|------------------------------------------------------------------------|----------------------------|------------------------------------|--------|
|--------------------------------------------------|------------------------------------------------------------------------|----------------------------|------------------------------------|--------|

|                                                                                          |                                |       |         |        |
|------------------------------------------------------------------------------------------|--------------------------------|-------|---------|--------|
| Deanna J. Taylor, Information<br>101 North Main Street<br>Santa Ana, California<br>92701 | Willie for Senate -<br>Montana | \$100 | 7-17-78 | 10,000 |
|------------------------------------------------------------------------------------------|--------------------------------|-------|---------|--------|

Appropriation of Expenditure  
to the Candidate

| Name, mailing address and ZIP Code of each donor | Name of Federal Candidate Supported<br>State, District & Office Sought | Particulars of Expenditure | Date Deposited<br>Day, Month, Year | Amount |
|--------------------------------------------------|------------------------------------------------------------------------|----------------------------|------------------------------------|--------|
|--------------------------------------------------|------------------------------------------------------------------------|----------------------------|------------------------------------|--------|

|                                        |  |  |  |           |
|----------------------------------------|--|--|--|-----------|
| TOTAL (Include all amounts from above) |  |  |  | \$ 42,000 |
|----------------------------------------|--|--|--|-----------|

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Nov. 1978  
 Federal Election Commission  
 11 K Street, N.W.  
 Washington, D.C. 20463

ITEMIZED COORDINATED EXPENDITURES MADE BY  
 POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S)  
 ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE  
 (2 U.S.C. 441a(d))  
 (Supporting Line 24, FEC Form 3)

Page 4 of 4  
 For Line 24, FEC Form 3

(To be used only by Political Committees in the General Election)

Name of Political Committee in Full

National Republican Senatorial Committee

Has your Committee been designated to make coordinated expenditures by a political party committee?

☒ YES

☐ NO

If YES, name the designating committee:

Republican National Committee

Full Name, Mailing Address and ZIP Code  
 of Each Payee

Name of Federal Candidate Supported,  
 State, District & Office Sought

Particulars of Expenditure

Date (month,  
 day, year)

Amount

Christopher Lord  
 5401 Westbard Avenue  
 Bethesda, Maryland 20016

Larry Williams  
 U. S. Senate  
 Montana

Political Research  
 Project (Allocated)

5-30-78

\$ 140.00

Aggregate General Election Expenditure  
 for this Candidate - \$

Full Name, Mailing Address and ZIP Code  
 of Each Payee

Name of Federal Candidate Supported,  
 State, District & Office Sought

Particulars of Expenditure

Date (month,  
 day, year)

Amount

Aggregate General Election Expenditure  
 for this Candidate - \$

Full Name, Mailing Address and ZIP Code  
 of Each Payee

Name of Federal Candidate Supported,  
 State, District & Office Sought

Particulars of Expenditure

Date (month,  
 day, year)

Amount

Aggregate General Election Expenditure  
 for this Candidate - \$

Full Name, Mailing Address and ZIP Code  
 of Each Payee

Name of Federal Candidate Supported,  
 State, District & Office Sought

Particulars of Expenditure

Date (month,  
 day, year)

Amount

Aggregate General Election Expenditure  
 for this Candidate - \$

Full Name, Mailing Address and ZIP Code  
 of Each Payee

Name of Federal Candidate Supported,  
 State, District & Office Sought

Particulars of Expenditure

Date (month,  
 day, year)

Amount

Aggregate General Election Expenditure  
 for this Candidate - \$

SUBTOTAL of expenditures this page (optional)

\$

\$

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FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR # 780

Date Filmed 4/18/79 Camera No. --- 2

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