

FEDERAL ELECTION COMMISSION

Conciliation proposals, correspondence, vote sheets & comments by Commissioners

Repayment memos

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 checked="" 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

Francis B. Stagan

Date

5-7-82

FEC 9-21-77

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 23, 1982

James D. Pembroke, Esquire
Duncan, Weinberg & Miller, P.C.
Suite 1200
1775 Pennsylvania Avenue, N.W.
Washington, D.C. 20006

RE: MUR 993

Dear Mr. Pembroke:

On April 20, 1982, the Commission accepted the conciliation agreement signed by the treasurer of the Udall '76 Committee in settlement of various Title 2 violations, provisions of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter, and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

Enclosed you will find a fully executed copy of the final conciliation agreement for your files.

Sincerely,

Charles N. Steele
General Counsel


BY: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation Agreement

82040323484

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Udall '76 Committee)

MUR 993

CERTIFICATION

I, Marjorie W. Emons, Recording Secretary for the Federal Election Commission Executive Session on April 20, 1982, do hereby certify that the Commission took the following actions in the above-captioned matter:

1. Decided by a vote of 4-2 to accept the conciliation agreement appended to the General Counsel's April 6, 1982 report in this matter.

Commissioners Aikens, Elliott, McDonald, and McGarry voted affirmatively for the decision. Commissioners Harris and Reiche dissented.

82040323485

4-22-82

Date

Attest:

Marjorie W. Emons

Marjorie W. Emons
Secretary of the Commission

2. Twelve Udall State Committees affiliated with the Respondent and involved herein acted as Respondent's agents to further the candidate's 1976 presidential campaign.

3. The Udall '76 Committee - California:

a) received a contribution of \$80 in the form of a reduced purchase price from a corporate vendor; in technical violation of 2 U.S.C. § 441(a);

b) failed to show disposition of debts totaling \$1,608.53, including those of two corporations in technical violation of 2 U.S.C. former § 434(b) (12).

4. The Udall Maryland Campaign failed to clarify overstatements of \$1,243.33 in reported receipts and expenditures in technical violation of 2 U.S.C. former § 434(b) (8) and (11).

5. The Massachusetts Udall '76 Committee failed to show disposition of two debts totaling \$1,769.42 to corporations in technical violation of 2 U.S.C. former § 434(b) (12).

6. The Pennsylvania Udall '76 Committee made 14 checks totaling \$5,156.54 payable to cash in excess of \$100 each in technical violation of 2 U.S.C. former § 437b(b).

7. The Washington Citizens for Udall '76
Committee:

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a) failed to provide complete and detailed records for audit in technical violation of 2 U.S.C. former § 432(d) and 11 C.F.R. former § 104.1(b)(1).

b) received a contribution of \$316 from a corporate vendor in the form of a reduced purchase price in technical violation of 2 U.S.C. § 441b(a).

c) failed to show disposition of seven debts totaling \$567.16 including one to a corporation in technical violation of 2 U.S.C. former § 434(b)(12).

8. The Wisconsin Udall '76 Committee made 22 checks totaling \$11,255.00 payable to cash, each in excess of \$100, in technical violation of 2 U.S.C. former § 437b(b).

9. Respondent contends that it did not knowingly or willfully violate any section of the law or regulations.

V. Respondent is liable for the actions of its agents.

VI. Respondent agrees that it shall not undertake any activity which is in violation of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431, et seq.

VII. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with

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this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

VIII. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

Charles N. Steele
General Counsel

April 22, 1982
Date

BY: *Kenneth A. Gross*
Kenneth A. Gross
Associate General Counsel

March 23, 1982
Date

Udall '76 Committee
Udall '76 Committee

BY: *Stanley Tury*
ITS: Treasurer

32040323409

Law Office
Duncan, Weinberg & Miller, P.C.

SUITE 1200

1775 PENNSYLVANIA AVENUE, N. W.

WASHINGTON, D. C. 20006

(202) 467-6370

TELECOPY (202) 467-6370

October 31, 1980

WALLACE L. DUNCAN
EDWARD WEINBERG
FREDERICK L. MILLER, JR.
JAMES D. PEBROKE
PHILIP L. CHABOT, JR.
J. CATHY LICHTENBERG
RICHMOND F. ALLAN
CAROL MACKINNON
JOHN WYETH GRIGGS

ANCHORAGE OFFICE
DAN A. HENSLEY
MARGIE MAE NEILLE
SUITE 407
400 L STREET
ANCHORAGE, ALASKA 99501
(907) 578-1880

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

HAND DELIVERED

Re: Freedom of Information Act Request

Dear Mr. Eiland:

This is a request, on behalf of the Udall '76 Committee, under the Freedom of Information Act, 5 U.S.C. Section 552.

The following document(s) are requested:

A copy of any brief, position paper, comments or memorandum prepared by a Federal Election Commission official or employee in regard to related to, or in response to the Post Hearing Memorandum filed on May 30, 1980 in the current proceeding involving the Udall '76 Committee.

Members of the FEC Staff who would be familiar with the requested documents are Charles Steele, Esquire, Kenneth Gross, Esquire, Anne Weissenborn, Esquire, or Fran Hagan.

On September 19, 1980, I filed an FOIA request seeking the above documents. By letter of September 29, 1980 you responded that no such documents existed. This request primarily covers the period from September 19 onward but also encompasses the period from May 30 to September 19 should any documents have been overlooked in your earlier search.

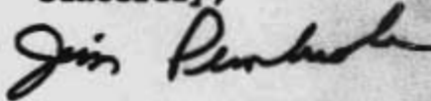
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Mr. Fred Biland
Page Two
October 31, 1980

Although I hope to review the documents prior to copying, we shall be happy to have the documents copied or to pay any charges that are assessed in accordance with applicable regulations in connection with this request. All communications concerning this request should be addressed to the undersigned.

If you have any questions, please call.

Sincerely,



James D. Pembroke

JDP/jb

cc: Charles N. Steele, Esquire

82040323491

Law Office
Duncan, Weinberg & Miller, P.C.

SUITE 1200

1775 PENNSYLVANIA AVENUE, N. W.

WASHINGTON, D. C. 20006

(202) 467-6370

TELECOPY (202) 467-6379

October 31, 1980

RECEIVED
OFFICE OF THE
GENERAL COUNSEL

30 OCT 31 P 4: 18

WALLACE L. DUNCAN
EDWARD WEINBERG
FREDERICK L. MILLER, JR.
JAMES D. PEMBROKE
PHILIP L. CHASOT, JR.
J. CATHY LICHTENBERG
RICHMOND F. ALLAN
CAROL MACKINNON
JOHN WYETH GRIGGS

ANCHORAGE OFFICE
DAN A. WENSLEY
MARGIE MAC NEILLE
SUITE 407
480 L STREET
ANCHORAGE, ALASKA 99501
(907) 579-1680

Charles N. Steele
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

HAND DELIVERED

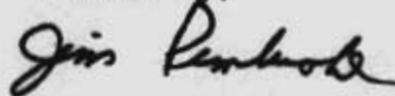
Re: Udall '76 Committee

Dear Mr. Steele:

This is to advise you that the Udall '76 Committee would like to initiate conciliation activities in regard to the matters involved in MUR 993. Additionally, the Committee would like to discuss the possibilities of settling with the FEC all outstanding matters in regard to Udall '76.

Please advise when it might be appropriate to conduct a meeting with FEC representatives and Udall '76 officials.

Sincerely,



James D. Pembroke

JDP/jb

cc: Stanley Kurz
Fran Hagan ✓

82040323492

82040323493

Law Office

Duncan, Weinberg & Miller, P.C.

SUITE 1200

1775 PENNSYLVANIA AVENUE, N. W.

WASHINGTON, D. C. 20006

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

Hand Delivered

3 2 0 4 0 5 1 3 4 4
Law Offices

Duncan, Weinberg & Miller, P.C.

SUITE 1200

1775 PENNSYLVANIA AVENUE, N. W.

WASHINGTON, D. C. 20006

HAND DELIVER

Charles N. Steele
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

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80 OCT 23 P 2: 25

HAND DELIVERED
910881

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ELECTION COMMISSION**

In the Matter of)
UDALL '76 COMMITTEE) MUR 993
and 12 STATE AFFILIATES)

**BRIEF SUBMITTED ON
BEHALF OF THE UDALL '76
COMMITTEE**

The Brief is filed in response to the Brief of the General Counsel submitted to the Commission on September 22, 1980.

Udall '76 takes issue here with two recommendations of the General Counsel.

In regard to item (c) under "Pennsylvania Udall '76" and in regard to item (a) under "Wisconsin Udall '76," the General Counsel recommends that probable cause findings be made with regard to expenditures made for "apparently unqualified campaign expenses."

For the same reasons stated in its Brief filed with the Commission on May 30, 1980, the Udall '76 Committee submits that probable cause findings are not warranted in regard to those expenditures. That Brief, formally titled "Post-Hearing Brief Filed On Behalf Of The Udall '76 Committee" was filed in the proceeding entitled "In Re Udall '76 Committee." That Brief is incorporated herein by reference.

Respectfully submitted,

James D. Pembroke 10/23/80
JAMES D. PEMBROKE
Duncan, Weinberg & Miller, P.C.
1775 Pennsylvania Avenue, N.W.
Suite 1200
Washington, D.C. 20006

Attorneys for Udall '76 Committee

32040323495

80100 80100

UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ELECTION COMMISSION

In the Matter of)
UDALL '76 COMMITTEE) MUR 993
and 12 STATE AFFILIATES)

10 OCT 123 P 2: 26

RECEIVED
GENERAL COUNSEL

BRIEF SUBMITTED ON
BEHALF OF THE UDALL '76
COMMITTEE


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Respectfully submitted,

 10/27/80
JAMES D. PEMBROKE
Duncan, Weinberg & Miller, P.C.
1775 Pennsylvania Avenue, N.W.
Suite 1200
Washington, D.C. 20006

Attorneys for Udall '76 Committee

82040323496

Oct 30 1980

Law Offices

Duncan, Winberg, Palmer & Miller, P.C.

SUITE 1200

1775 PENNSYLVANIA AVENUE, N. W.
WASHINGTON, D. C. 20006

Handwritten signature: Howard

2040323197

From

Law Offices

Duncan, Winberg, Palmer & Miller, P.C.

SUITE 1200

1775 PENNSYLVANIA AVENUE, N. W.
WASHINGTON, D. C. 20006

To

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

ATTENTION: General Counsel

P.L. 800

HAND DELIVERED

82040323498

Law Office
Duncan, Weinberg, Polow & Miller, P.C.
SUITE 1200
1775 PENNSYLVANIA AVENUE, N.W.
WASHINGTON, D. C. 20006

*Delivered
Frank*

<i>From</i>	<p><i>Law Office</i> <i>Duncan, Weinberg, Polow & Miller, P.C.</i> SUITE 1200 1775 PENNSYLVANIA AVENUE, N. W. WASHINGTON, D. C. 20006</p>
<i>To</i>	<p>FEDERAL ELECTION COMMISSION 1325 K Street, N.W. Washington, D.C. 20463 ATTENTION: Secretary's Office</p>



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 9, 1980

Frederick L. Miller, Jr., Esquire
Duncan, Weinberg & Miller, P.C.
Suite 1200
1775 Pennsylvania Avenue, N.W.
Washington, D.C. 20006

RE: MUR 993

Dear Mr. Miller:

This is in response to your letter dated September 29, 1980, requesting an extension of time to respond to the General Counsel's Brief which makes additional recommendations regarding the above-captioned matter.

The Commission has agreed to your request and will extend the response period until the close of business on October 24, 1980.

If you have any questions, please contact Frances B. Hagan at (202) 523-4057.

Sincerely,

Charles N. Steele
General Counsel

82040323499



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Frederick L. Miller, Jr., Esquire
Duncan, Weinberg & Miller, P.C.
Suite 1200
1775 Pennsylvania Avenue, N.W.
Washington, D.C. 20006

RE: MUR 993

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Sincerely,

Charles N. Steele
General Counsel

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of
Udall '76 Committee

)
)
)

MUR 993

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on October 8, 1980, the Commission decided by a vote of 6-0 to take the following actions regarding MUR 993:

1. Approve the request for an extension of time to respond to the General Counsel's Brief of September 22, 1980.
2. Send the notification letter as attached to the General Counsel's October 6, 1980 memorandum.

Voting for this determination were Commissioners Aikens, Friedersdorf, Harris, McGarry, Reiche, and Tiernan.

Attest:

10/8/80

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

Received in Office of the Commission Secretary: 10-6-80, 11:37
Circulated on 48 hour vote basis: 10-6-80, 4:00

82040323501

October 6, 1980

MEMORANDUM TO: Marjorie W. Emmons
FROM: Elisea T. Garr
SUBJECT: MER 993

Please have the attached Memo distributed to the Commission on a 48 hour tally basis. Thank you.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

80 OCT 6 11:37

October 6, 1980

MEMORANDUM

TO: The Commission
FROM: Charles N. Steele *CS*
General Counsel
SUBJECT: Udall '76 Committee Request for Extension
of Time to Respond to Brief (MUR 993)

Attached for the Commission's consideration is a copy of the Udall '76 Committee's request for an extension of time to respond to the General Counsel's Brief of September 22, 1980, which contains probable cause recommendations regarding certain Title 2 violations.

The request comes from the Counsel representing the Committee, and informs us that the attorney handling the matter will be away until four days after the response due date of October 10, 1980. Counsel requests an extension of ten (10) days after the attorney returns to provide a response.

It is the Office of General Counsel's opinion that the request is reasonable in that the issues involved require a knowledgeable hand if the matters are to be resolved efficiently and expeditiously. All parties would be better served by allowing the extension of time for reply by the appropriate attorney. Therefore, we recommend approval of the request for an extension of time and of the attached notification letter.

Attachment

Letter from Frederick L. Miller, Jr. dated 9/29/80
Letter to Frederick L. Miller, Jr.

32040323503



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Frederick L. Miller, Jr., Esquire
Duncan, Weinberg & Miller, P.C.
Suite 1200
1775 Pennsylvania Avenue, N.W.
Washington, D.C. 20006

RE: MUR 993

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The Commission has agreed to your request and will extend the response period until the close of business on October 24, 1980.

If you have any questions, please contact Frances B. Hagan at (202) 523-4057.

Sincerely,

Charles N. Steele
General Counsel

82040323504

Hagan
Law Office
Duncan, Weinberg & Miller, P.C.

SUITE 1200

1775 PENNSYLVANIA AVENUE, N. W.

WASHINGTON, D. C. 20006

(202) 467-6370

TELECOPY (202) 467-6379

WALLACE L. DUNCAN
EDWARD WEINBERG
FREDERICK L. MILLER, JR.
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ANCHORAGE OFFICE
DAN A. HENSLEY
MARGIE MAD NEILLE
SUITE 407
450 L STREET
ANCHORAGE, ALASKA 99501
(907) 276-1880

September 29, 1980

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

HAND DELIVER

Attention: Frances B. Hagan
Office of the General Counsel
7th Floor

Dear Commissioners:

This firm represents the Udall '76 Committee in MUR 993 and related matters before the Commission. The individual attorney in this firm who is responsible for this matter, James Pembroke, is in Ireland until October 14, 1980 and cannot be reached. The only other attorney who was familiar with the matter, Fredrick Palmer, recently withdrew from this firm.

On September 25, 1980, I received a telephone call from Stanley Kurz, Treasurer of the Udall '76 Committee. He had just received a two-page letter from your General Counsel, Charles N. Steele, transmitting a copy of the General Counsel's Brief in MUR 993, and notifying him that the Committee has fifteen days from receipt of the material to file 10 copies of a brief stating the Committee's position on the issues and replying to the brief of the General Counsel. The due date for such a filing would be October 10, 1980, under the terms of Mr. Steele's letter.

Because of Mr. Pembroke's total unavailability until October 14, when he will return to the office from Ireland, and because of the fact that he is the only attorney still remaining with the firm who is at all familiar with the factual and

SEP 29 1980

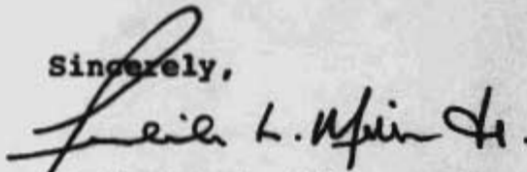
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Federal Election Commission
Page Two
September 29, 1980

legal matters at issue, we respectfully request on behalf of the Udall '76 Committee (Mr. Kurz, Treasurer of the Committee, joins in this request through us) that we be given to and including October 24, 1980 to take the actions contemplated by Mr. Steele's letter of September 22, including the filing of a written position on the issues and the filing of a reply brief.

We thank you for your expeditious consideration of this request.

Sincerely,



Frederick L. Miller, Jr.

FLMjr/jb

cc: Stanley Kurz

82040323,506

CC#2816

Law Offices
Duncan, Weinberg & Miller, P.C.

SUITE 1200

1775 PENNSYLVANIA AVENUE, N. W.

WASHINGTON, D. C. 20006

(202) 467-6370

TELECOPY (202) 467-6379

WALLACE L. DUNCAN
EDWARD WEINBERG
FREDERICK L. MILLER, JR.
JAMES D. PEMBROKE
PHILIP L. CHABOT, JR.
J. CATHY LICHTENBERG
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ANCHORAGE OFFICE
DAN A. HENSLEY
MARGIE MAE NEILLE
SUITE 407
450 L STREET
ANCHORAGE, ALASKA 99501
(907) 278-1880

September 29, 1980

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

HAND DELIVER

Attention: Frances B. Hagan
Office of the General Counsel
7th Floor

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Because of Mr. Pembroke's total unavailability until October 14, when he will return to the office from Ireland, and because of the fact that he is the only attorney still remaining with the firm who is at all familiar with the factual and

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SEP 29 1980

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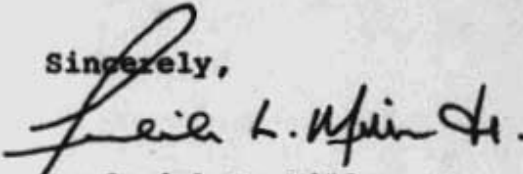
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Federal Election Commission
Page Two
September 29, 1980

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We thank you for your expeditious consideration of this request.

Sincerely,


Frederick L. Miller, Jr.

FLMjr/jb

cc: Stanley Kurz

82040323508

Law Offices
Duncan, Winberg, Palmer & Miller, P.C.

SUITE 1200

1775 PENNSYLVANIA AVENUE, N. W.
WASHINGTON, D. C. 20006

9 5 3 2 3 2 3 5 0 4 0

From

Law Offices

Duncan, Winberg, Palmer & Miller, P.C.

SUITE 1200

1775 PENNSYLVANIA AVENUE, N. W.
WASHINGTON, D. C. 20006

To

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

ATTENTION: Frances B. Hagan - 4057
Office of the General
Counsel
7th Floor

HAND DELIVER



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 22, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Stanley Kurz, Treasurer
Udall '76 Committee
122 East 42nd Street
New York, New York 10017

Re: MUR 993

Dear Mr. Kurz:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, and information supplied by you, the Federal Election Commission, on October 2, 1979, found reason to believe that your committee, through the actions of your affiliated state committees, violated former sections 432, 433, 434, 437b and 441b of the Federal Election Campaign Act of 1971, as amended, and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find probable cause to believe that in certain cases, a violation has occurred.

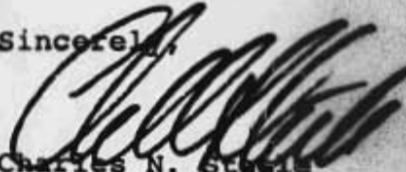
Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies) stating your position on the issues and replying to the brief of the General Counsel. (Three copies of such brief should also be forwarded to the Office of General Counsel.) The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of probable cause to believe a violation has occurred.

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A finding of probable cause to believe requires that the Office of General Counsel attempt for a period of not less than thirty, but not more than ninety days to settle this matter through a conciliation agreement. This does not preclude settlement of this matter through informal conciliation prior to a finding of probable cause to believe, if you so desire.

Should you have any questions, please contact Frances B. Hagan at 202-523-4057.

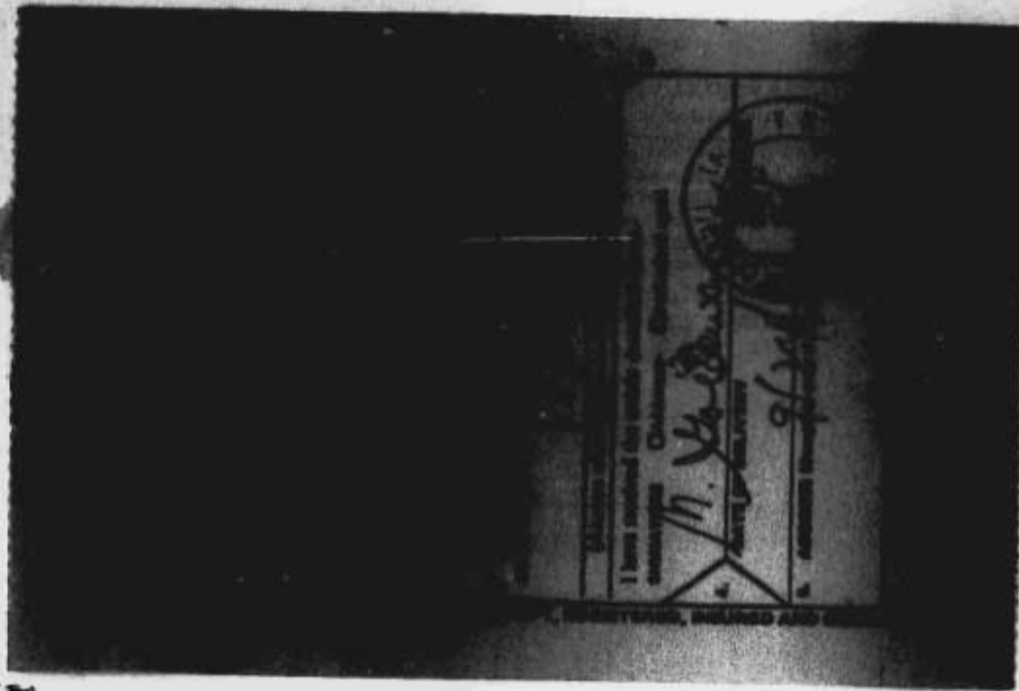
Sincerely,



Charles N. Steele
General Counsel

Enclosure
Brief

82040323511



September 22, 1960

MEMORANDUM TO: Marjorie W. Emmons
FROM: Eliza T. Garr
SUBJECT: MUR 993

Please have the attached Memo distributed to the
Commission on an informational basis. Thank you.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

80 SEP 22 P12: 05

September 22, 1980

MEMORANDUM TO: The Commission

FROM: Charles N. Steele *CS*
General Counsel

SUBJECT: MUR #993, Udall '76 and 12 State Affiliates

Attached for the Commission's review is a brief stating the position of the General Counsel on the legal and factual issues of the above-captioned matter. A copy of this brief and a letter notifying the respondent of the General Counsel's intent to recommend to the Commission a finding of probable cause to believe was mailed on Sept. 22, 1980. Following receipt of the respondent's reply to this notice, this Office will make a further report to the Commission.

Attachments

1. Brief
2. Letter to Respondent

32040323513

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Udall '76 Committee and) MUR 993
12 State Affiliates)

GENERAL COUNSEL'S BRIEF

I. Statement of the Case and Legal Analysis

On October 2, 1979, the Federal Election Commission found reason to believe that the Udall '76 Committee and twelve state affiliates violated certain Title 2 provisions of the Federal Election Campaign Act, as amended, during the 1976 presidential election.

Following notification of the findings, the Udall '76 Committee submitted amended reports and statements addressing a variety of unresolved issues. The Audit Division reviewed this material to determine its value and effect on the audit recommendation. Their comments and suggestions were forwarded to this office for review. This brief contains an analysis of this document and of Committee responses to the Commission's reason to believe finding. Conclusions based on the analysis are included for each violation.

Udall '76 Committee (National)

The individual state affiliates noted herein acted as agents of the National Committee in furthering the Udall campaign. The National Committee is thereby liable for the actions of its affiliates. Therefore, we are recommending the probable cause finding against the National Committee when it applies to a Udall state committee.

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Udall '76 Committee - Arizona

The Committee overstated receipts and expenditures by \$15,251.77 when the treasurer reported contributions which were collected by Arizona, but were deposited and reported by the National Committee. This violates 2 U.S.C. former §434(b)(8) and (11).

The Committee's second attempt to amend its report is incorrect, as only the expenditure overstatement was deleted. However, as the contributions were accurately itemized by the National Committee, and in order to avoid further delay in this matter, we are recommending that no further action be taken.

Udall '76 California Committee

- a) The Committee failed to document 27% of the known expenditures or 28% of the known dollar amount of expenditures in violation of 2 U.S.C. former §432(d). An attempt was made, however, to obtain additional documents, which resulted in a letter from the state treasurer regarding the validity of expenditures made by his Committee. It is our opinion that this constitutes evidence of best efforts made to obtain documentation, and that no further action is required.
- b) The Committee failed to itemize 9% of expenditures requiring itemization in violation of 2 U.S.C. former §434(b)(9). As the Committee has since itemized as required, we are recommending no further action in this matter.
- c) The Committee's records include two invoices from a corporate entity for office paper purchased for \$229.11. The purchase price

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is reduced by \$80 and marked as a campaign "contribution." The Committee has not responded to the Commission's requirement that the corporate gift be refunded. We are therefore recommending that the Commission find probable cause to believe that a violation of 2 U.S.C. §441b(a) occurred in this case.

d) The Committee filed a termination report on July 10, 1976. Six debts totaling \$1,608.53 remain outstanding; two debts to corporations require debt settlement statements to resolve them. As the Committee failed to respond regarding the disposition of these debts, we recommend that the Commission find probable cause to believe that a violation of 2 U.S.C. former §434(b)(12) occurred in this case.

Udall Maryland Campaign

a) The Committee originally failed to itemize 5 transfers-in totaling \$7,910 as required. Amended reports now include 4 of the 5 transfers. Therefore, we recommend no further action regarding the violation of 2 U.S.C. former §434(b)(4).

b) The Committee failed to provide documentation for 21% of the items or 22% of the total known dollar amount of \$31,487.92 requiring documentation. In response to the National Committee's attempt to obtain documentation, the Maryland treasurer submitted a letter regarding the validity of expenditures. We recommend that this evidence be considered best efforts to obtain documentation and that no further action be taken regarding the violation of 2 U.S.C. former §432(d).

c) The Committee originally misreported two refunds and two in-kind contributions in violation of 2 U.S.C. former §434(b)(2) and (7), and 11 CFR former §104.3(a)(1) and (2). The Committee's

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amended reports correctly itemize these receipts. Therefore, we recommend no further action in this matter.

d) The Committee reported receipts and expenditures of \$37,429.45 for the period March 1, 1976, through March 31, 1977. Auditors found that the reported amounts were overstated by \$1,243.33, and that several reported entries were marked "accounting adjustments." The Committee failed to clarify the discrepancy. Therefore, we are recommending that the Commission find probable cause to believe that a violation of 2 U.S.C. former §434(b)(8) and (11) occurred in this case.

Massachusetts Udall '76

The Committee extinguished two corporate debts at amounts below the debts incurred, but failed to submit for Commission review the required settlement statements. The National Committee, unable to contact the Massachusetts treasurer, sent letters to the corporations in question, requesting information necessary to determine whether debts were treated in a commercially reasonable manner. Because the Committee has been officially notified twice of its responsibility in this matter, without results, we would recommend that the Commission find probable cause to believe that a violation of 2 U.S.C. former §434(b)(12) and 11 CFR former § 114.10(c) occurred in this case.

Udall '76 Massachusetts Special Events Committee

The audit report concerning this Committee notes that the Committee registered with the Clerk of the House of Repre-

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representatives on January 17, 1975, and later transferred funds to the National Committee. When the transfer occurred, the Special Events Committee had not been authorized in writing by the candidate. However, the Special Events Committee terminated in July 1975, and received written confirmation of such from the Commission's Reports Analysis Division at the time. The report was filed prior to promulgation and publication of the applicable regulation. Therefore, it is our opinion that no violation occurred in this case, and we recommend a finding of no probable cause to believe that the Committee violated 2 U.S.C. former §433(a), (b) (2) and 11 CFR former §102.12(a) (1).

Michigan Udall for President

a) The Committee originally failed to itemize certain expenditures sampled for audit. Amended reports have now been filed which include these items. While the amendment incorrectly adds in the total of these items, we would not suggest additional amendments to offset the inflated expense figure. We recommend no further action regarding the violation of 2 U.S.C. former §434(b) (9).

b) The Committee failed to provide documentation for 38% of the expenditure items or 25% of the total dollar amount of \$69,452.37 requiring documentation. The National Committee made an attempt to obtain additional expenditure documentation from the state treasurer. The treasurer submitted a notarized letter asserting the validity of the Committee expenditures. We

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consider this evidence to be best efforts by the Committee and recommend no further action as to the violation of 2 U.S.C. former §432(d) and 11 CFR former §102.9(c) and (e).

New Mexico Udall '76 Committee

a) The Committee failed to provide documentation for 25% of the total known expenditure items or 21% of the total known dollar amount of \$10,180.75 requiring documentation. The National Committee contacted the state treasurer regarding additional documentation. The treasurer submitted a notarized letter asserting the validity of Committee expenditures. We consider the attempt to obtain documents to be best efforts on the part of the Committee and recommend no further action in the violation of 2 U.S.C. former §432(d) and 11 CFR former §102.9(c) and (e).

b) The Committee originally failed to itemize 18 of 24 contributions, representing 75% of the items and 63% of the total dollar amount of \$5,975.20 requiring itemization. Subsequent amendments correctly include these items. In addition, however, the Committee again added the total of these receipts into the cash-on-hand figure, thereby inflating reported receipts for the year. However, as the itemization is a matter of public record, we do not suggest additional amendments. We recommend that no further action be taken in the violation of 2 U.S.C. former §434(b)(2).

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New York Udall '76

a) The Committee originally failed to itemize 35% of the contributor items or 20% of the total dollar amount of \$17,280 requiring itemization. A subsequent amendment properly itemizes the contributors. The amendment also includes the dollar value of these items which had been previously reported. Instead of suggesting yet another amendment to delete the inflated cash-on-hand amount, we would recommend that no further action be taken regarding the violation of 2 U.S.C. former 434(b)(2).

b) The Committee originally failed to disclose receipt of an in-kind contribution of \$900. This contribution is properly reported in the Committee's amendment. Therefore, we recommend no further action regarding the violation of 2 U.S.C. former §434(b)(2) as stated in 11 CFR former §104.3(a)(1) and (2).

Udall '76 Committee - Ohio

a) The National Committee records account for all but \$10,000 of the contributors previously unidentified. The National Committee offered a master list of Ohio contributors which provides at least \$7,565.17 in additional contributions which may account for most of the discrepancy between bank deposits in Ohio and reported contributors from that state. While these cannot be fully verified, it appears that the receipts were reported by

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the National Committee. In view of this evidence, the requested information concerning possible fundraising activity in Ohio is not essential to resolution of this matter. Therefore, we recommend no further action on the violation of 2 U.S.C. former §432(c)(1).

b) The Committee failed to provide documentation for 47% of items and 46% of the total known dollar amount of \$62,895.19 in expenditures requiring itemization. The National Committee attempted to obtain documents from the state treasurer. In response, the treasurer sent a notarized letter asserting the validity of expenditures. We consider the attempt to obtain documents to be a showing of best efforts. Therefore, we recommend no further action regarding the violation of 2 U.S.C. former §432(d) and 11 CFR former §102.9(c)(4) and (e).

c) The Committee originally failed to itemize 47 of at least 142 expenditures requiring itemization. Available records show \$62,895.19 in expenditures totaling in excess of \$100. Amended reports itemize the expenditures as required, but also add in the dollar amount which was previously reported. While this inflates the expenditure figure for 1976, we would not recommend additional amendments to correct it. We recommend that no further action be taken in the violation of 2 U.S.C. former §434(b)(9).

Pennsylvania Udall '76

a) The Committee failed to provide documentation for 22% of expenditure items and 16% of the known dollar amount of \$92,405.11 requiring documentation. The National Committee contacted the

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Pennsylvania treasurer regarding the missing documents and received a letter from the treasurer which asserted the validity of expenditures made. We consider the efforts made to obtain documentation to be best efforts on the part of the Committee and recommend that the Commission take no further action in the violation of 2 U.S.C. former §432(d) and 11 CFR former §102.9(c)(4) and (e).

b) The Committee originally failed to itemize on disclosure reports certain expenditures in excess of \$100. The amended reports include these items, but also add their dollar value which was previously reported. We would not require additional amendments to correct the overstated expenditures for the year as later reports reflect the accurate figure. We are recommending that no further action be taken in the violation of 2 U.S.C. former §434(b)(9).

c) The Committee wrote 14 checks to "cash," totaling \$5,156.54, each in excess of \$100. The auditors found no petty cash journal or other documentation to verify that these disbursements were for petty cash purposes. These expenditures are included among the National Committee's apparently unqualified campaign expenses. The Committee has not responded to the Commission's requirement for documentation of the excessive cash expenses. Therefore, we recommend that the Commission find probable cause to believe that a violation of 2 U.S.C. former §437b(b) and 11 CFR former §102.10 occurred in this case.

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Washington Citizens for Udall '76

a) The Committee failed to provide complete and detailed records for audit in violation of 2 U.S.C. former 432(c) and (d), and 11 CFR former §104.12(b)(1). The missing records include bank statements and deposit tickets for the period December 1, 1975, through February 29, 1976, when more than a third of the Committee's total reported activity took place. As a result, auditors were unable to verify \$5,176 in reported receipts and \$5,290.48 in reported expenditures.

The National Committee attempted to obtain the documents from the state treasurer. This effort cannot be deemed "best efforts" in our opinion. Bank records, unlike other types of documents, are essential to fulfilling the statutory audit function of verifying reported receipts and expenditures. In this case, the National Committee may have achieved "best efforts" had it attempted to obtain bank records directly from the state committee's depository (as it did for other states). As the Committee did not contact the source of these records to obtain them, we recommend that the Commission find probable cause to believe that a violation of 2 U.S.C. former §432(d) and 11 CFR former §104.12(b)(1) occurred.

b) The Committee records include an invoice from a corporate entity for printing. The contract price of \$882 has been reduced by \$316 and labeled as a "contribution." The Committee has not responded to the Commission's requirement that the amount of the corporate contribution be refunded. We recommend, therefore, that the Commission find probable cause to believe

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that a violation of 2 U.S.C. §441b(a) occurred in this case.

c) The Committee failed to document 60% of the expenditure items and 50% of the total known dollar amount of \$10,183.41 requiring documentation. The National Committee contacted the state treasurer for additional documents and received a notarized letter affirming the validity of expenditures.

The National Committee has also supplied payee confirmation letters for eight of the originally unsupported expenditures. Therefore, we consider these attempts to be best efforts by the Committee and would recommend no further action regarding the violation of 2 U.S.C. former §432(d) and 11 CFR former §102.9(c)(4) and (e).

d) The Committee's available expenditure records show that 31 of at least 52 expenditures were not itemized as required by 2 U.S.C. former §434(b)(9). These items represent \$5,685.11 of the total dollar amount of \$10,783.41 requiring itemization. Amended reports include the itemizations. The Committee also added the total value of these items which had been previously reported. While this inflates reported expenditures for the year, we would not suggest additional amendments to attempt clarification. The correct amounts are reflected on later reports for public record. Therefore, we recommend no further action in this matter.

e) The Committee terminated, leaving outstanding debts totaling \$3,099.32. In response to the Commission's urging, the National Committee explained that it had assumed three debts for the State Committee and paid two of them in full. The third debt was settled for 25% off the amount outstanding or

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\$550.00. No debt settlement statement was provided for the Commission's consideration. Seven debts totaling \$567.16 apparently remain outstanding.

As the Committee has not shown final disposition of these debts, and has not submitted a debt settlement statement for Commission review, we are recommending probable cause to believe that a violation of 2 U.S.C. former §434(b)(12) and 11 CFR former §104.1(a)(1) and 114.10(c) occurred in this case.

Wisconsin Udall '76

a) The Committee wrote 22 checks to "cash," totaling \$11,255.00, each in excess of \$100. The Committee did not maintain a petty cash fund, and auditors found only partial documentation for 13 of the expenditures in question. When notified of the reason to believe finding, the Committee itemized the necessary cash expenditures on reports, but failed to provide additional documents to support the funds. As the Committee made excessive cash expenditures for purposes other than to replenish a petty cash fund, we are recommending that the Commission find probable cause to believe that a violation of 2 U.S.C. former §437b(b) and 11 CFR former §102.10 occurred in this case.

b) The Committee originally failed to itemize 26% of the number of contributions and 18% of the total dollar amount of \$18,782.71 requiring itemization. An amended report includes the itemizations. It also adds in the dollar amount which had been previously reported. While this inflates the cash on hand figure for 1975 and 1976, we recommend that the amendments be accepted as filed, and that no further action be taken in this matter.

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II. General Counsel's Recommendations

1. Find probable cause to believe that the Udall '76 Committee (National) violated 2 U.S.C. former §§432, 434, 437b, 441b(a) through the actions of its state affiliates.
2. Take no further action against the Udall '76 Committee - Arizona for the violation of 2 U.S.C. former §434(b)(8) and (11).
3. Take no further action against the Udall '76 Committee - California for the following violations:
 - a) 2 U.S.C. former §432(d)
 - b) 2 U.S.C. former §434(b)(9).
4. Find probable cause to believe that the Udall '76 Committee - California violated the following:
 - a) 2 U.S.C. §441b(a)
 - b) 2 U.S.C. former §434(b)(12).
5. Take no further action against the Udall Maryland Campaign for the violations of :
 - a) 2 U.S.C. former §434(b)(4)
 - b) 2 U.S.C. former §432(d)
 - c) 2 U.S.C. former §434(b)(2) and (7) and
11 CFR former §104.3(a)(1) and (2).
6. Find probable cause to believe that the Udall Maryland Campaign violated 2 U.S.C. former §434(b)(8) and (11).
7. Find probable cause to believe that the Massachusetts Udall '76 Committee violated 2 U.S.C. former §434(b)(12) and 11 CFR former §114.10(c).
8. Find no probable cause to believe that the Udall '76 Massachusetts Special Events Committee violated 2 U.S.C. former §433, as stated in 11 CFR former §102.12(a)(1).

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9. Take no further action against the Michigan Udall for President Committee regarding the violation of:
 - a) 2 U.S.C. former §434(b)(9)
 - b) 2 U.S.C. former §432(d), and
11 CFR former §102.9(c)(4) and (e).
10. Take no further action against the New Mexico Udall '76 Committee regarding the following:
 - a) 2 U.S.C. former §432(d) and
11 CFR former §102.9(c)(4) and (e)
 - b) 2 U.S.C. former §434(b)(2).
11. Take no further action against the New York Udall '76 Committee regarding the following:
 - a) 2 U.S.C. former §434(b)(2)
 - b) 2 U.S.C. former §434(b)(2) as stated in
11 CFR §104.3(a)(1) and (2).
12. Take no further action against the Udall '76 Committee - Ohio regarding the following:
 - a) 2 U.S.C. former §432(c)(1)
 - b) 2 U.S.C. former §432(d), and
11 CFR former §102.9(c)(4) and (e)
 - c) 2 U.S.C. former §434(b)(9).
13. Take no further action against the Pennsylvania Udall '76 Committee regarding the following:
 - a) 2 U.S.C. former §432(d) and
11 CFR former §102.9(c)(4) and (e)
 - b) 2 U.S.C. former §434(b)(9).

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14. Find probable cause to believe that the Pennsylvania Udall '76 Committee violated 2 U.S.C. former §437b(b) and 11 CFR former §102.10.

15. Find probable cause to believe that the Washington Citizens for Udall '76 Committee violated the following:

- a) 2 U.S.C. former §432(d)
11 CFR former §104.12(b) (1)
- b) 2 U.S.C. §441b(a)
- c) 2 U.S.C. former §434(b) (12)
11 CFR former §104.1(a) (1).

16. Take no further action against the Washington Citizens for Udall '76 Committee in the violation of:

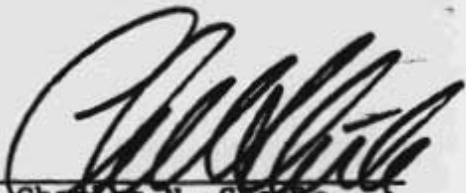
- a) 2 U.S.C. former §432(d)
11 CFR former §102.9(c) (4) and (e)
- b) 2 U.S.C. former §434(b) (9).

17. Find probable cause to believe that the Wisconsin Udall '76 Committee violated 2 U.S.C. former §437b(b), 11 CFR former §102.10.

18. Take no further action against the Wisconsin Udall '76 Committee regarding the violation of 2 U.S.C. former §434(b) (2).

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22 Sept 1980
Date


Charles N. Steere
General Counsel

Attachments

Letter to Stanley Kurz



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 5, 1980

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

THROUGH: ORLANDO B. POTTER *O.P.P.*
STAFF DIRECTOR

FROM: BOB COSTA *RC*

SUBJECT: RESPONSE OF THE UDALL '76 COMMITTEE
AND AFFILIATES IN MUR 993

Attached please find the Audit Division's recommendations concerning amendments and documentation submitted by the Udall '76 Committee in regard to MUR 993.

If you have any questions regarding these matters, please do not hesitate to contact Joe Stoltz or Glen Buco on extension 34155.

Attachment as stated

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Udall '76 Committee - Arizona

A. 2 U.S.C. 434(b)(8)(11)

On December 3, 1979, the Committee filed a comprehensive amendment to correct the overstatement of receipts and expenditures. The amendment is incorrect as filed since the Committee adjusted expenditures but failed to reduce total receipts thereby disclosing an incorrect total receipt and cash on hand figure as of December 31, 1976.

However, the Audit staff recommends that the comprehensive amendment be accepted as filed, and that no further amendments be required.

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Udall '76 California Committee

A. 2 U.S.C. 432(d)

Though the scheduled expenditures were incurred by the Udall '76 California Committee, the national committee assumed responsibility for obtaining documentation. The Committee contacted the Udall '76 California Committee treasurer, but received no additional documentation other than a notarized letter asserting that each expenditure was a qualified campaign expense.

After discussion with the Office of General Counsel, the Audit staff recommends that since the Committee attempted to obtain additional documentation from the state treasurer, that the Committee attempts be considered "best efforts" with no further action required.

B. 2 U.S.C. 434(b) (9)

The Committee itemized or identified as reported, the 12 noted expenditures. Therefore, the Audit staff recommends no further action.

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

No Committee response provided.

D. 2 U.S.C. 434(b) (12)

No Committee response provided.

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Udall Maryland Campaign

A. 2 U.S.C. 434(b) (4)

The Committee itemized four (4) of the noted transfers as required. The Committee did not itemize the fifth transfer, a transfer of \$310.00 from the Joseph D. Gebhardt Candidate For Delegate Committee.

The Audit staff recommends that no additional amendments be required.

B. 2 U.S.C. 432(d)

Though the scheduled expenditures were incurred by the Udall Maryland Campaign, the national committee assumed responsibility for obtaining documentation. The Committee contacted the Maryland Udall Campaign treasurer, but received no additional documentation other than a notarized letter asserting that each expenditure was a qualified campaign expense, and the treasurer's personal recollections concerning selected expenditures.

After discussion with the Office of General Counsel, the Audit staff recommends that since the Committee attempted to obtain additional documentation from the state treasurer, that the Committee attempts be considered "best efforts" with no further action required.

C. 2 U.S.C. 434(b) (2) and (7), 11 C.F.R Section 104.3(a) (1) and (2)

The Committee itemized the noted refunds and in-kind contributions as required. Therefore, the Audit staff recommends no further action.

D. 2 U.S.C. 434(b) (8), (11)

No additional records provided.

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Massachusetts Udall '76 Committee

A. 2 U.S.C. 434(b) (12), 11 C.F.R. 114.10(c)

The Committee stated in its response that they were unable to contact the Massachusetts Udall '76 Committee treasurer, and provided copies of letters sent to the two (2) companies involved. The letters were sent on December 3, 1979, but no response from the companies has been submitted by the Committee.

The Audit staff recommends that the Committee continue its efforts to contact the state treasurer, and send a second letter to the companies in question in order to obtain the information necessary to determine whether the debts were treated in a commercially reasonable manner and to file Statements of Debt Settlement as required.

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Michigan Udall For President Committee

A. 2 U.S.C. 434(b) (9)

The Committee itemized two (2) of the expenditures, and sufficiently explained Committee reporting procedures to identify as reported, the remaining 13 expenditures.

Though correctly itemizing the required expenditures, the comprehensive amendment filed is incorrect in that the dollar value of expenditures was added to the previously reported total expenditure figure for 1976, thereby inflating total expenditures and disclosing a negative cash on hand. The amended expenditures had previously been reported and included in total expenditures but not itemized as required.

The Audit staff recommends that the amendments be accepted as filed, and that no further amendments be required. *WALL*

B. 2 U.S.C. 432(d), 11 C.F.R. Section 102.9(c) and (e)

Though the scheduled expenditures were incurred by the Michigan Udall For President Committee, the national committee assumed responsibility for obtaining documentation. The Committee contacted the Michigan Udall For President treasurer, but received no additional documentation other than a notarized letter asserting that each expenditure was a qualified campaign expense, and the treasurer's personal recollections concerning selected expenditures.

After discussions with the Office of General Counsel, the Audit staff recommends that since the Committee attempted to obtain additional documentation from the state treasurer, that the Committee attempts be considered "best efforts" with no further action required. *WALL*

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New York Udall '76 Committee

A. - 2 U.S.C. 434(b) (2)

The Committee filed a comprehensive amendment to itemize the 25 contributions as required.

In doing so, the Committee also incorrectly added the dollar value of the contributions to total receipts for 1976, thereby inflating total receipts, and disclosing an incorrect cash on hand figure as of 12/31/76. The noted contributions had previously been reported and included in total receipts, but not itemized as required.

The Audit staff recommends that the comprehensive amendment filed by the Committee be accepted as filed, and that no further amendment be required.

B. 2 U.S.C. 434(b) (2), 11 C.F.R. Section 104.3(a) (1)

The noted in-kind contribution was itemized and included in New York Udall '76 Committee receipt and expenditure totals as required.

The Audit staff recommends no further action.

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Udall '76 Committee - Ohio

A. 2 U.S.C. 432(c)(1)

(1) The Committee states that the \$10,000.00 discrepancy resulted from the collection of contributions by the Ohio Udall '76 Committee, which were erroneously reported as a transfer-in from the national committee. To support this, the Committee provided a copy of the Ohio section of the master contributor list, which identifies contributions from Ohio totaling \$7,565.17 more than reported by the Ohio affiliate.

The Audit staff compared the list provided to the Udall '76 matching fund submissions and affiliate reports, and though unable to verify totally the source of the \$10,000.00, recommends that the Committee explanation be accepted with no further action required.

(2) No additional records were provided concerning the April 9, 1976 fundraising event.

B. 2 U.S.C. 432(d)

Though the scheduled expenditures were incurred by the Ohio Udall '76 Committee, the national committee assumed responsibility for obtaining documentation. The Committee contacted the Ohio Udall '76 Committee treasurer, but received no additional documentation other than a notarized letter asserting that each expenditure was a qualified campaign expense.

After discussion with the Office of General Counsel, the Audit staff recommends that since the Committee attempted to obtain additional documentation from the state treasurer, that the Committee attempts be considered "best efforts" with no further action required.

C. 2 U.S.C. 434(b)(9)

The Committee itemized or identified as reported, the noted expenditures.

Though correctly itemizing the required expenditures, the comprehensive amendment filed is incorrect in that the dollar value of expenditures was added to the previously reported total expenditure figure for 1976, thereby inflating total expenditures and disclosing a negative cash on hand. The amended expenditures had previously been reported and included in total expenditures, but not itemized as required.

The Audit staff recommends that the amendments be accepted as filed, and that no further amendments be required.

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New Mexico Udall '76 Committee

A. 2 U.S.C. 432(d), 11 C.F.R. 102.9(c)(4) and (e)

Though the scheduled expenditures were incurred by the New Mexico Udall '76 Committee, the national committee assumed responsibility for obtaining documentation. The Committee contacted the New Mexico committee treasurer, but did not receive any additional documentation other than a notarized letter from the treasurer asserting that each expenditure was a qualified campaign expense.

After discussion with the Office of General Counsel, the Audit staff recommends that since the Committee attempted to obtain additional documentation from the state treasurer, that Committee attempts be considered "best efforts" with no further committee action required.

C. 2 U.S.C. 434(b)(2)

The Committee itemized the 18 contributions as required.

Though correctly itemizing the required contributions, the comprehensive amendment filed is incorrect in that the dollar value of the contributions was added to the previously reported total receipt figure for 1976, thereby inflating total receipts and disclosing an incorrect cash on hand figure as of 12/31/76. The amended contributions had previously been reported and included in total receipts, but not itemized as required. *agree*

The Audit staff recommends that the amendments be accepted as filed, and that no further amendments be required.

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Pennsylvania Udall '76 Committee

A. 2 U.S.C. 432(d), 11 C.F.R. Section 102.9(c)(4) and (e)

Though the scheduled expenditures were incurred by the Pennsylvania Udall '76 Committee, the national committee assumed responsibility for obtaining documentation. The Committee contacted the Pennsylvania State Coordinator for the Udall '76 Committee, but received no additional documentation other than a notarized letter asserting that each expenditure was a qualified campaign expense.

After discussions with the Office of General Counsel, the Audit staff recommends that since the Committee attempted to obtain additional documentation from the state coordinator, that the Committee attempts be considered "best efforts" with no further action required.

B. 2 U.S.C. 434(b)(9)

The Committee itemized the forty one expenditures as required.

Though correctly itemizing the noted expenditures, the comprehensive amendment filed is incorrect in that the dollar value of the aforementioned expenditures was added to the previously reported total expenditure figure for 1976, thereby inflating total expenditures and disclosing a negative cash on hand. The amended expenditures had previously been reported and included in total expenditures, but not itemized as required.

The Audit staff recommends that the amendments be accepted as filed, with no further amendments required.

C. 2 U.S.C. 437b(b), 11 C.F.R. Section 102.10

No Committee response provided.

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Washington Citizens For Udall '76 Committee

A. 2 U.S.C. 432(d), 11 C.F.R. Section 104.12(b) (1)

The Committee contacted the Washington Citizens For Udall '76 Committee assistant treasurer, and verbally and in writing attempted to obtain the records requested by the Audit staff. This the Committee feels demonstrates their "best efforts" to comply.

In the opinion of the Audit staff, "best efforts" does not apply in their attempt to obtain bank records, and the Audit staff recommends that the Committee request the records directly from the bank.

B. 2 U.S.C. 441b(a)

No Committee response provided.

C. 2 U.S.C. 432(d), 11 C.F.R. Section 102.9(c) (4) and (e)

Though the scheduled expenditures were incurred by the Washington Citizens For Udall '76 Committee, the national committee assumed responsibility for obtaining documentation. The Committee contacted the assistant treasurer of the affiliate, but received no additional documentation.

After discussion with the Office of General Counsel, the Audit staff recommends that since the Committee attempted (verbally and in writing) to obtain additional documentation from the assistant treasurer, that the Committee attempts be considered "best efforts" with no further action required.

D. 2 U.S.C. 434(b) (9)

The Committee filed a comprehensive amendment to itemize the 31 expenditures as required.

In doing so, the Committee also incorrectly added the dollar value of expenditures to the previously reported total expenditure figure for 1976, thereby inflating total expenditures, and disclosing a negative cash on hand figure as of December 31, 1976. The noted expenditures had previously been reported, and included in total expenditures but not itemized as required.

82040323539

The Audit staff recommends that the comprehensive amendment filed by the Committee be accepted as filed, and that no further amendments be required.

E. 2 U.S.C. 434(b) (12), 11 C.F.R. Section 104.1(a) (1)

The Washington Citizens For Udall '76 Committee disclosed debts totaling \$3,099.32 which were outstanding as of the date of termination. Two (2) of the debts were assumed and paid by the national committee, one (1) debt was settled for 75% of the actual amount (no debt settlement statement filed) and the remaining seven (7) debts totaling \$567.16 show no final disposition.

The Committee contacted the affiliate's state coordinator and assistant treasurer for information concerning the debts, but did not correspond directly with the remaining individuals and companies.

The Audit staff recommends that the Committee contact each creditor directly to determine the disposition of the remaining seven (7) debts.

82040323540

Wisconsin Udall '76 Committee

A. 2 U.S.C. 437b(b), 11 C.F.R. Section 102.10

The Committee filed comprehensive amendments for 1975 and 1976, and itemized the seven (7) noted expenditures showing the payee as "CASH".

In doing so, the Committee also incorrectly added the dollar value of expenditures to the previously reported total expenditure figure for 1975 and 1976, thereby inflating total expenditures, and disclosing an incorrect cash on hand figure as of December 31, 1976. The noted expenditures had previously been reported, and included in total expenditures but not itemized as required.

The Audit staff recommends that the comprehensive amendments be accepted as filed and that no further amendments be required. However, the Audit staff's recommendation does not preclude further Commission action regarding Committee violation of 2 U.S.C. 437b(b) and 11 C.F.R. Section 102.10.

B. 2 U.S.C. 434(b) (2)

The Committee filed comprehensive amendments for 1975 and 1976 itemizing the 53 noted contributions.

Similar to Finding A, the Committee incorrectly added the dollar value of contributions to the previously reported receipt totals for 1975 and 1976, thereby inflating total receipts and disclosing an incorrect cash on hand as of December 31, 1976.

The Audit staff recommends that the comprehensive amendments be accepted as filed, and that no further amendments be required.

82040323541



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 22, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Stanley Kurz, Treasurer
Udall '76 Committee
122 East 42nd Street
New York, New York 10017

Re: MUR 993

Dear Mr. Kurz:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, and information supplied by you, the Federal Election Commission, on October 2, 1979, found reason to believe that your committee, through the actions of your affiliated state committees, violated former sections 432, 433, 434, 437b and 441b of the Federal Election Campaign Act of 1971, as amended, and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find probable cause to believe that in certain cases, a violation has occurred.

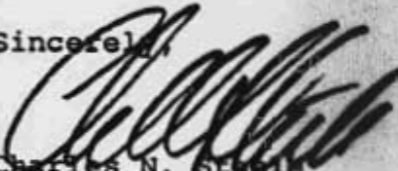
Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies) stating your position on the issues and replying to the brief of the General Counsel. (Three copies of such brief should also be forwarded to the Office of General Counsel.) The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of probable cause to believe a violation has occurred.

8204032342

A finding of probable cause to believe requires that the Office of General Counsel attempt for a period of not less than thirty, but not more than ninety days to settle this matter through a conciliation agreement. This does not preclude settlement of this matter through informal conciliation prior to a finding of probable cause to believe, if you so desire.

Should you have any questions, please contact Frances B. Hagan at 202-523-4057.

Sincerely,



Charles N. Steele
General Counsel

Enclosure
Brief

82040323943



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE *mwe*
FROM: MARJORIE W. EMMONS/MARGARET CHANEY *mc*
DATE: SEPTEMBER 18, 1980
SUBJECT: MUR 993 - Interim Investigative Report #3, dated
9-15-80; Received in OCS 9-16-80, 2:51

The above-named document was circulated to the Commission on a no-objection basis at 11:00, September 17, 1980.

There were no objections to the Interim Investigative Report at the time of the deadline.

A copy of Commissioner Reiche's vote sheet is attached showing a question he submitted.

92040323544

ATTACHMENT:
Copy of Vote Sheet

Bt

RECEIVED
COMM. SECRETARY



88 SEP 17 P 2: 58
FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

DATE AND TIME OF TRANSMITTAL WEDNESDAY, 9-17-80
11:00

Commissioner FRIEDERSDORF, AIKENS, TIERNAN, MCGARRY, REICHE, HARRIS

RETURN TO THE OFFICE OF COMMISSION SECRETARY BY: THURSDAY, SEPT. 18, 1980
11:00

MUR No. 993 - Interim Investigative Report #3 dated 9-15-80

() I object to the recommendation in the attached report.

COMMENTS: Why so long?

Date 9/17/80 Signature Frank P. Reiche

OBJECTIONS, SIGNED AND DATED, MUST BE RECEIVED IN THE COMMISSION SECRETARY'S OFFICE NO LATER THAN THE DATE AND TIME SHOWN ABOVE OR THE MATTER WILL BE DEEMED APPROVED. PLEASE RETURN ALL PAPERS TO THE OFFICE OF THE SECRETARY TO THE COMMISSION.

82040323545



September 16, 1980

MEMORANDUM TO: Marjorie W. ~~XXXXXX~~.....
FROM: Elissa T. GALT.....
SUBJECT: NUR 993

Please have the attached Interim Invest Report
distributed to the Commission. Thank you.

9 2 0 4 0 3 2 3 5 4 6

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

80 SEP 18 P 2: 51

In the Matter of)
)
Udall '76 Committee and)
State Affiliates)

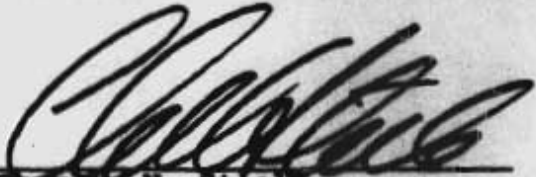
MJR 993

INTERIM INVESTIGATIVE REPORT #3

On October 2, 1979, the Commission found reason to believe that the Udall '76 Committee and State Affiliates violated 2 U.S.C. §§ 432, 433, 434, 437b, and 441b(a) for a variety of reporting and recordkeeping deficiencies and the apparent receipt of prohibited contributions.

We have prepared a brief for circulation to the Commission which makes additional recommendations regarding findings against these Committees.

15 Sept 1980
Date



Charles N. Steels
General Counsel

82040323547



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE
FROM: MARJORIE W. EMMONS/MARGARET CHANEY *mc*
DATE: AUGUST 5, 1980
SUBJECT: MUR 993 - Interim Investigative Report #4
dated 8-4-80; Received in OCS 8-4-80,
12:28

The above-named document was circulated to the Commission on a 24 hour no-objection basis at 4:00, August 4, 1980.

There were no objections to the Interim Investigative Report at the time of the deadline.

However, Commissioner Friedersdorf submitted a question and Commisisoner Reiche submitted a comment. Copies of the vote sheets are attached.

ATTACHMENT:
Copy of Vote Sheets

82040323548

August 4, 1980

MEMORANDUM TO: Marguerite W. Emmons
FROM: Elissa T. Carr
SUBJECT: NUR 993

Please have the attached Interim Invest Report
distributed to the Commission e

Thank you.

82040323549

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

In the Matter of)
)
Udall '76 Committee and)
12 State Affiliates)

80 AUG 4 12: 28
MUR 993

INTERIM INVESTIGATIVE REPORT #4

On October 2, 1979, the Commission found reason to believe that the Udall '76 Committee and 12 State Affiliates violated 2 U.S.C. former §§ 432, 433, 434, 437b, and 441b(a) for a variety of reporting and recordkeeping deficiencies and the apparent receipt of prohibited contributions.

After reviewing the Committee's responses and the Audit Division's subsequent referral, we have drafted a brief with additional recommendations in each case. The brief will be prepared for circulation to the Commission.

Date

4 August 1980


Charles N. Steele
General Counsel

82040323550



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE
FROM: MARJORIE W. EMMONS/MARGARET CHANEY *me*
DATE: MAY 22, 1980
SUBJECT: MUR 993 - Interim Investigative Report #3,
dated 5-20-80; Received in OCS
5-21-80, 11:11

The above-named document was circulated to the Commission on a 24 hour no-objection basis at 4:00, May 21, 1980.

There were no objections to the Interim Investigative Report at the time of the deadline; however, Commissioner Friedersdorf submitted a comment. A copy of his vote sheet is attached.

ATTACHMENT:
Copy of Vote Sheet

32040323551

May 21, 1980

MEMORANDUM TO: Marjorie W. Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 993

Please have the attached Interim Invest Report distributed to the Commission. Thank you.

8 2 0 4 0 3 2 3 5 5 2

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

80 MAY 21 AM: 11

In the Matter of)
) MUR 993
Udall '76 Committee and)
Twelve State Affiliates)

INTERIM INVESTIGATIVE REPORT #3

On October 2, 1979, the Commission found reason to believe that the Udall '76 Committee and Twelve State Affiliates violated 2 U.S.C. §§ 432, 433, 434, 437b, and 441b(a) for a variety of reporting and recordkeeping deficiencies and the apparent receipt of prohibited contributions.

The Audit Division recently completed an in-depth review of the Udall State Committee's amended reports and additional information submitted by the Committee. The auditors' report has been forwarded to this Office for consideration regarding the degree of compliance resulting from Committee efforts. When we have reviewed and analyzed the information, we can offer further recommendations to the Commission.

20 May 1980
Date


Charles N. Steele
General Counsel

8 2 0 4 0 3 2 3 5 5 3

A-752



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 5, 1980

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

THROUGH: ORLANDO B. POTTER *OB.P.*
STAFF DIRECTOR

FROM: BOB COSTA *RC*

SUBJECT: RESPONSE OF THE UDALL '76 COMMITTEE
AND AFFILIATES IN MUR 993

Attached please find the Audit Division's recommendations concerning amendments and documentation submitted by the Udall '76 Committee in regard to MUR 993.

If you have any questions regarding these matters, please do not hesitate to contact Joe Stoltz or Glen Buco on extension 34155.

Attachment as stated

82040323554

Udall '76 Committee - Arizona

A. 2 U.S.C. 434(b)(8)(11)

On December 3, 1979, the Committee filed a comprehensive amendment to correct the overstatement of receipts and expenditures. The amendment is incorrect as filed since the Committee adjusted expenditures but failed to reduce total receipts thereby disclosing an incorrect total receipt and cash on hand figure as of December 31, 1976.

However, the Audit staff recommends that the comprehensive amendment be accepted as filed, and that no further amendments be required.

82040323555

Udall '76 California Committee

A. 2 U.S.C. 432(d)

Though the scheduled expenditures were incurred by the Udall '76 California Committee, the national committee assumed responsibility for obtaining documentation. The Committee contacted the Udall '76 California Committee treasurer, but received no additional documentation other than a notarized letter asserting that each expenditure was a qualified campaign expense.

After discussion with the Office of General Counsel, the Audit staff recommends that since the Committee attempted to obtain additional documentation from the state treasurer, that the Committee attempts be considered "best efforts" with no further action required.

B. 2 U.S.C. 434(b) (9)

The Committee itemized or identified as reported, the 12 noted expenditures. Therefore, the Audit staff recommends no further action.

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

No Committee response provided.

D. 2 U.S.C. 434(b) (12)

No Committee response provided.

8 2 0 4 0 3 2 3 5 5 6

Udall Maryland Campaign

A. 2 U.S.C. 434(b) (4)

The Committee itemized four (4) of the noted transfers as required. The Committee did not itemize the fifth transfer, a transfer of \$310.00 from the Joseph D. Gebhardt Candidate For Delegate Committee.

The Audit staff recommends that no additional amendments be required.

B. 2 U.S.C. 432(d)

Though the scheduled expenditures were incurred by the Udall Maryland Campaign, the national committee assumed responsibility for obtaining documentation. The Committee contacted the Maryland Udall Campaign treasurer, but received no additional documentation other than a notarized letter asserting that each expenditure was a qualified campaign expense, and the treasurer's personal recollections concerning selected expenditures.

After discussion with the Office of General Counsel, the Audit staff recommends that since the Committee attempted to obtain additional documentation from the state treasurer, that the Committee attempts be considered "best efforts" with no further action required.

C. 2 U.S.C. 434(b) (2) and (7), 11 C.F.R Section 104.3(a) (1) and (2)

The Committee itemized the noted refunds and in-kind contributions as required. Therefore, the Audit staff recommends no further action.

D. 2 U.S.C. 434(b) (8) (11)

No additional records provided.

82040323557

Massachusetts Udall '76 Committee

A. 2 U.S.C. 434(b) (12), 11 C.F.R. 114.10(c)

The Committee stated in its response that they were unable to contact the Massachusetts Udall '76 Committee treasurer, and provided copies of letters sent to the two (2) companies involved. The letters were sent on December 3, 1979, but no response from the companies has been submitted by the Committee.

The Audit staff recommends that the Committee continue its efforts to contact the state treasurer, and send a second letter to the companies in question in order to obtain the information necessary to determine whether the debts were treated in a commercially reasonable manner and to file Statements of Debt Settlement as required.

8 2 0 4 0 3 2 3 5 5 8

Michigan Udall For President Committee

A. 2 U.S.C. 434(b) (9)

The Committee itemized two (2) of the expenditures, and sufficiently explained Committee reporting procedures to identify as reported, the remaining 13 expenditures.

Though correctly itemizing the required expenditures, the comprehensive amendment filed is incorrect in that the dollar value of expenditures was added to the previously reported total expenditure figure for 1976, thereby inflating total expenditures and disclosing a negative cash on hand. The amended expenditures had previously been reported and included in total expenditures but not itemized as required.

The Audit staff recommends that the amendments be accepted as filed, and that no further amendments be required.

B. 2 U.S.C. 432(d), 11 C.F.R. Section 102.9(c) and (e)

Though the scheduled expenditures were incurred by the Michigan Udall For President Committee, the national committee assumed responsibility for obtaining documentation. The Committee contacted the Michigan Udall For President treasurer, but received no additional documentation other than a notarized letter asserting that each expenditure was a qualified campaign expense, and the treasurer's personal recollections concerning selected expenditures.

After discussions with the Office of General Counsel, the Audit staff recommends that since the Committee attempted to obtain additional documentation from the state treasurer, that the Committee attempts be considered "best efforts" with no further action required.

82040323559

New York Udall '76 Committee

A. 2 U.S.C. 434(b) (2)

The Committee filed a comprehensive amendment to itemize the 25 contributions as required.

In doing so, the Committee also incorrectly added the dollar value of the contributions to total receipts for 1976, thereby inflating total receipts, and disclosing an incorrect cash on hand figure as of 12/31/76. The noted contributions had previously been reported and included in total receipts, but not itemized as required.

The Audit staff recommends that the comprehensive amendment filed by the Committee be accepted as filed, and that no further amendment be required.

B. 2 U.S.C. 434(b) (2), 11 C.F.R. Section 104.3(a) (11)

The noted in-kind contribution was itemized and included in New York Udall '76 Committee receipt and expenditure totals as required.

The Audit staff recommends no further action.

82040323560

Udall '76 Committee - Ohio

A. 2 U.S.C. 432(c)(1)

(1) The Committee states that the \$10,000.00 discrepancy resulted from the collection of contributions by the Ohio Udall '76 Committee, which were erroneously reported as a transfer-in from the national committee. To support this, the Committee provided a copy of the Ohio section of the master contributor list, which identifies contributions from Ohio totaling \$7,565.17 more than reported by the Ohio affiliate.

The Audit staff compared the list provided to the Udall '76 matching fund submissions and affiliate reports, and though unable to verify totally the source of the \$10,000.00, recommends that the Committee explanation be accepted with no further action required.

(2) No additional records were provided concerning the April 9, 1976 fundraising event.

B. 2 U.S.C. 432(d)

Though the scheduled expenditures were incurred by the Ohio Udall '76 Committee, the national committee assumed responsibility for obtaining documentation. The Committee contacted the Ohio Udall '76 Committee treasurer, but received no additional documentation other than a notarized letter asserting that each expenditure was a qualified campaign expense.

After discussion with the Office of General Counsel, the Audit staff recommends that since the Committee attempted to obtain additional documentation from the state treasurer, that the Committee attempts be considered "best efforts" with no further action required.

C. 2 U.S.C. 434(b)(9)

The Committee itemized or identified as reported, the noted expenditures.

Though correctly itemizing the required expenditures, the comprehensive amendment filed is incorrect in that the dollar value of expenditures was added to the previously reported total expenditure figure for 1976, thereby inflating total expenditures and disclosing a negative cash on hand. The amended expenditures had previously been reported and included in total expenditures, but not itemized as required.

The Audit staff recommends that the amendments be accepted as filed, and that no further amendments be required.

82040323561

New Mexico Udall '76 Committee

A. 2 U.S.C. 432(d), 11 C.F.R. 102.9(c)(4) and (e)

Though the scheduled expenditures were incurred by the New Mexico Udall '76 Committee, the national committee assumed responsibility for obtaining documentation. The Committee contacted the New Mexico committee treasurer, but did not receive any additional documentation other than a notarized letter from the treasurer asserting that each expenditure was a qualified campaign expense.

After discussion with the Office of General Counsel, the Audit staff recommends that since the Committee attempted to obtain additional documentation from the state treasurer, that Committee attempts be considered "best efforts" with no further committee action required.

C. 2 U.S.C. 434(b)(2)

The Committee itemized the 18 contributions as required.

Though correctly itemizing the required contributions, the comprehensive amendment filed is incorrect in that the dollar value of the contributions was added to the previously reported total receipt figure for 1976, thereby inflating total receipts and disclosing an incorrect cash on hand figure as of 12/31/76. The amended contributions had previously been reported and included in total receipts, but not itemized as required.

The Audit staff recommends that the amendments be accepted as filed, and that no further amendments be required.

82040323562

Pennsylvania Udall '76 Committee

A. 2 U.S.C. 432(d), 11 C.F.R. Section 102.9(c)(4) and (e)

Though the scheduled expenditures were incurred by the Pennsylvania Udall '76 Committee, the national committee assumed responsibility for obtaining documentation. The Committee contacted the Pennsylvania State Coordinator for the Udall '76 Committee, but received no additional documentation other than a notarized letter asserting that each expenditure was a qualified campaign expense.

After discussions with the Office of General Counsel, the Audit staff recommends that since the Committee attempted to obtain additional documentation from the state coordinator, that the Committee attempts be considered "best efforts" with no further action required.

B. 2 U.S.C. 434(b)(9)

The Committee itemized the forty one expenditures as required.

Though correctly itemizing the noted expenditures, the comprehensive amendment filed is incorrect in that the dollar value of the aforementioned expenditures was added to the previously reported total expenditure figure for 1976, thereby inflating total expenditures and disclosing a negative cash on hand. The amended expenditures had previously been reported and included in total expenditures, but not itemized as required.

The Audit staff recommends that the amendments be accepted as filed, with no further amendments required.

C. 2 U.S.C. 437b(b), 11 C.F.R. Section 102.10

No Committee response provided.

82040323563

Washington Citizens For Udall '76 Committee

A. 2 U.S.C. 432(d), 11 C.F.R. Section 104.12(b) (1)

The Committee contacted the Washington Citizens For Udall '76 Committee assistant treasurer, and verbally and in writing attempted to obtain the records requested by the Audit staff. This the Committee feels demonstrates their "best efforts" to comply.

In the opinion of the Audit staff, "best efforts" does not apply in their attempt to obtain bank records, and the Audit staff recommends that the Committee request the records directly from the bank.

B. 2 U.S.C. 441b(a)

No Committee response provided.

C. 2 U.S.C. 432(d), 11 C.F.R. Section 102.9(c) (4) and (e)

Though the scheduled expenditures were incurred by the Washington Citizens For Udall '76 Committee, the national committee assumed responsibility for obtaining documentation. The Committee contacted the assistant treasurer of the affiliate, but received no additional documentation.

After discussion with the Office of General Counsel, the Audit staff recommends that since the Committee attempted (verbally and in writing) to obtain additional documentation from the assistant treasurer, that the Committee attempts be considered "best efforts" with no further action required.

D. 2 U.S.C. 434(b) (9)

The Committee filed a comprehensive amendment to itemize the 31 expenditures as required.

In doing so, the Committee also incorrectly added the dollar value of expenditures to the previously reported total expenditure figure for 1976, thereby inflating total expenditures, and disclosing a negative cash on hand figure as of December 31, 1976. The noted expenditures had previously been reported, and included in total expenditures but not itemized as required.

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The Audit staff recommends that the comprehensive amendment filed by the Committee be accepted as filed, and that no further amendments be required.

E. 2 U.S.C. 434(b)(12), 11 C.F.R. Section 104.1(a)(1)

The Washington Citizens For Udall '76 Committee disclosed debts totaling \$3,099.32 which were outstanding as of the date of termination. Two (2) of the debts were assumed and paid by the national committee, one (1) debt was settled for 75% of the actual amount (no debt settlement statement filed) and the remaining seven (7) debts totaling \$567.16 show no final disposition.

The Committee contacted the affiliate's state coordinator and assistant treasurer for information concerning the debts, but did not correspond directly with the remaining individuals and companies.

The Audit staff recommends that the Committee contact each creditor directly to determine the disposition of the remaining seven (7) debts.

8 2 0 4 0 3 2 3 5 6 5

Wisconsin Udall '76 Committee

A. 2 U.S.C. 437b(b), 11 C.F.R. Section 102.10

The Committee filed comprehensive amendments for 1975 and 1976, and itemized the seven (7) noted expenditures showing the payee as "CASH".

In doing so, the Committee also incorrectly added the dollar value of expenditures to the previously reported total expenditure figure for 1975 and 1976, thereby inflating total expenditures, and disclosing an incorrect cash on hand figure as of December 31, 1976. The noted expenditures had previously been reported, and included in total expenditures but not itemized as required.

The Audit staff recommends that the comprehensive amendments be accepted as filed and that no further amendments be required. However, the Audit staff's recommendation does not preclude further Commission action regarding Committee violation of 2 U.S.C. 437b(b) and 11 C.F.R. Section 102.10.

B. 2 U.S.C. 434(b) (2)

The Committee filed comprehensive amendments for 1975 and 1976 itemizing the 53 noted contributions.

Similar to Finding A, the Committee incorrectly added the dollar value of contributions to the previously reported receipt totals for 1975 and 1976, thereby inflating total receipts and disclosing an incorrect cash on hand as of December 31, 1976.

The Audit staff recommends that the comprehensive amendments be accepted as filed, and that no further amendments be required.

82040323566



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO THE FILE ON MUR 993

FROM: MARJORIE W. EPPONS *MWE*

DATE: APRIL 24, 1980

SUBJECT: ACTION TAKEN AT EXECUTIVE SESSION ON APRIL 22, 1980

At the Executive Session of April 22, 1980, Vice Chairman Friedersdorf withdrew his objection to the General Counsel's Interim Investigative Report #2 in MUR 993.

82040323567



FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO: CHARLES STEELE *MWE*
FROM: MARJORIE W. EMMONS/MARGARET CHANEY *mc*
DATE: APRIL 15, 1980
SUBJECT: OBJECTION - MUR 993 - Interim Investigative
Report #2, dated 4-14-80; Received
in OCS 4-14-80, 1:00

The above-named document was circulated on a 24
hour no-objection basis at 4:00, April 14, 1980.

Commissioner Friedersdorf submitted an objection
at 4:09, April 15, 1980, thereby placing MUR 993 on the
Executive Session Agenda for April 22, 1980.

82040323568

April 14, 1980

MEMORANDUM TO: Marjorie W. Emmons
FROM: Elissa T. Garr
SUBJECT: NUR 993

Please have the attached Interim invest Report distributed to the Commission. Thank you.

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BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

80 APR 14 P 1: 00


In the Matter of)
) MUR 993
Udall '76 Committee and)
Twelve State Affiliates)

INTERIM INVESTIGATIVE REPORT # 2

On October 2, 1979, the Commission found reason to believe that the Udall '76 Committee and Twelve State Affiliates violated 2 U.S.C. §§ 432, 433, 434, 437b, and 441b(a) for a variety of reporting and recordkeeping deficiencies and the apparent receipt of prohibited contributions.

The Office of General Counsel and Audit Division are currently reviewing the Committee's submission state by state, carefully considering reports filed and other information provided regarding alleged violations to determine the degree of compliance. Upon completion of this process, we can report in depth to the Commission.

14 April 1980
Date



Charles N. Steele
General Counsel

82040323570



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE *MWE*
FROM: MARJORIE W. EMMONS/MARGARET CHANEY *mc*
DATE: FEBRUARY 27, 1980
SUBJECT: MUR 993 - Interim Investigative Report
dated 2-19-80; Signed 2-25-80;
Received in OCS 2-25-80, 4:08

The above-named document was circulated to the Commission on a 24-hour no-objection basis at 11:00, February 26, 1980.

There were no objections to the Interim Investigative Report at the time of the deadline; however, Commissioner Reiche submitted comments. A copy of his vote sheet is attached.

ATTACHMENT:
Copy of Vote Sheet

82040323571

February 25, 1980

MEMORANDUM TO: Marjorie W. Emmons
FROM: Jane Golgrove
SUBJECT: MUR 993

Please have the attached Interim Investigative Report on MUR 993 distributed to the Commission on a 24 hour no-objection basis.

Thank you.

92040323572

Before the Federal Election Commission
February 19, 1980

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

80 FEB 25 P 4: 08

In the Matter of)	
)	
)	MUR 993
Udall '76 Committee and)	
12 State Affiliates)	

Interim Investigative Report #3

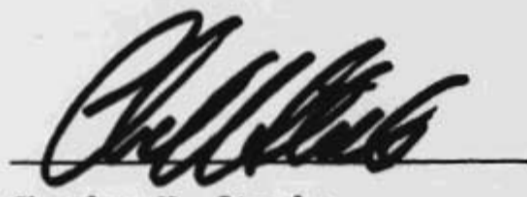
On October 2, 1979, the Commission found reason to believe that the Udall '76 Committee and twelve State Affiliates violated 2 U.S.C. §§ 432, 433, 434, 437b, and 441b(a) for a variety of reporting and recordkeeping deficiencies and the apparent receipt of prohibited contributions.

We are coordinating with the Audit Division our review of amended reports for each committee. A thorough study of the detailed information supplied by the Committee is required. However, we expect to report to the Commission within two weeks.

82040323573

25 February 1980

Date



Charles N. Steele
General Counsel



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE *MWE*
FROM: MARJORIE W. EMMONS/MARGARET CHANEY *mc*
DATE: JANUARY 8, 1980
SUBJECT: MUR 993 - Interim Investigative Report dated
1-4-80; Received in OCS 1-7-80, 10:55

The above-named document was circulated to the Commission on a 24-hour no-objection basis at 4:00, January 7, 1980.

There were no objections to the Interim Investigative Report at the time of the deadline.

82040323574

January 71 1980

MEMORANDUM TO: Marjorie W. Emons
FROM: Elissa T. Garr
SUBJECT: MUR 993

Please have the attached Interim Invest Report
on MUR 993 distributed to the Commission.

Thank you.

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BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

80 JAN 7 AIO: 55

In the Matter of)
) MUR 993
Udall '76 Committee and)
12 State Affiliates)

INTERIM INVESTIGATIVE REPORT

On October 2, 1979, the Commission found reason to believe that the Udall '76 Committee and twelve state affiliates violated 2 U.S.C. §§ 432, 433, 434, 437b and 441b(a) for a variety of reporting and recordkeeping deficiencies and the apparent receipt of prohibited contributions.

Counsel for the Udall '76 Committee has submitted responses to the allegations on behalf of the National Committee and each of its state affiliates. A detailed review of the information contained in the voluminous documents is necessary before we can offer recommendations regarding it.

4 January 1980
Date

Charles N. Steele
Charles N. Steele
General Counsel

82040323576



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE *g*
FROM: MARJORIE W. EMMONS /MARGARET CHANEY *me*
DATE: DECEMBER 3, 1979
SUBJECT: MUR 993 - Interim Investigative Report
dated 11-29-79; Received in OCS
10-30-79, 10:19

The above-named document was circulated to
the Commission on a 24-hour no-objection basis
at 2:00, November 30, 1979.

There were no objections to the Interim Investigative
Report at the time of the deadline.

82040323577

November 30, 1979

MEMORANDUM TO: Marjorie W. Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 993

Please have the attached Interim InvestReport on
MUR 993 distributed to the Commission.

Thankyou.

8 2 0 4 0 3 2 3 5 7 8



UDALL FOR PRESIDENT
Office of the National Treasurer
122 East 42 Street, New York, N.Y. 10017 • (212) 697-2233

gce # 71893

December 3, 1979

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

Attn: Charles Steele
Acting General Counsel

Re: MUR 993

Dear Mr. Steele:

The Udall '76 Committee is responding to your letter of October 18, 1979, on behalf of the New Mexico Udall '76 Committee.

Enclosed please find a Comprehensive Amendment for the year 1976 which itemizes receipts totaling \$3,757.20 which had been previously omitted from the Committee's reports. The National Committee encountered a problem in doing this amendment. As the Audit staff noted in its interim and final audit reports of the New Mexico Committee, reports were not filed on a timely basis. However, on December 9, 1977, the New Mexico Committee did file a report for the period from May 1, 1976 through December 6, 1977.

The final report covers two (2) calendar years and thus it was difficult, in fact impossible, to maintain the integrity of the calendar year 1976 and correct year-to-date totals. This was also compounded by the fact that the National Committee did not have any records for the New Mexico committee other than copies of the reports as filed. Thus, we have tried to reflect as accurately as is possible the total receipts and expenditures for the years 1976 and 1977.

If you should have any further questions, please contact Mr. Edward Coyle of Congressman Udall's staff, at (202)225-9790.

Sincerely,

Stanley Kurz
STANLEY KURZ
National Treasurer

SK:ejd

cc: Honorable Morris K. Udall
Charles K. Bowyer, Treasurer
New Mexico Udall '76 Committee
James D. Pembroke, Esq.

RECEIVED
OFFICE OF THE
GENERAL COUNSEL

REPORT OF RECEIPTS AND EXPENDITURES FOR A CANDIDATE OR COMMITTEE SUPPORTING CANDIDATE(S) FOR NOMINATION OR ELECTION TO FEDERAL OFFICE

(Except for Candidates or Committees Receiving Federal Matching Funds)

Note: Committees authorized by a candidate to receive contributions and make expenditures in connection with more than one election must maintain separate records with respect to each election.

1 NEW MEXICO UDALL '76 COMMITTEE

Name of Candidate or Committee (in full)

2 I.D. No. _____ Candidate/Committee

c/o UDALL '76 COMMITTEE, 122 EAST 42ND STREET

Address (number and street)

3 PRESIDENCY

Office Sought, State/District (if applicable)

NEW YORK, NEW YORK 10017

City, State and ZIP Code

Check if address is different than previously reported.

Year of Election 1976

4 Type of Report (check appropriate boxes)

April 10 Quarterly Report

Tenth day report preceding _____ election
(primary, general or convention)

Termination Report

July 10 Quarterly Report

on _____ in the State of _____
(date)

Amendment for:
1976 AND 1977
(which report)

October 10 Quarterly Report

Thirtieth day report following _____ election
(primary, general or convention)

January 31 Annual Report

Monthly Report _____ on _____ in the State of _____
(month) (date)

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 This Period	Column B Calendar Year-To-Date
<u>1/1/76</u> Through <u>12/31/77</u>		
6 Cash on hand January 1, 19 <u>COMPREHENSIVE ADJUSTMENT -</u>		\$ <u>265.07</u>
<u>ADJUSTMENTS</u>		
7 Cash on hand at beginning of reporting period <u>(AS REPORTED 12/6/77)</u>	\$ <u>265.07</u>	
8 Total receipts (from line 19)	\$ <u>3757.20</u>	\$ <u>19,862.79</u>
(a) Subtotal (Add lines 7 and 8 for Column A and lines 6 and 8 for Column B)	\$ <u>4022.27</u>	\$ <u>20,127.86</u>
9 Total expenditures (from line 25)	\$ <u>0</u>	\$ <u>15,929.90</u>
10 Cash on hand at close of reporting period (Subtract line 9 from line 8a)	\$ <u>4022.27</u>	\$ <u>4,197.96</u>
11 Value of contributed items on hand to be liquidated (Attach itemized list) \$ _____		
12 Debts and obligations owed to the Committee/Candidate (itemize all on Schedule C) . . .	\$ <u>0</u>	
13 Debts and obligations owed by the Committee/Candidate (itemize all on Schedule C) . . .	\$ <u>0</u>	

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.
12/31/75 (Date) STANLEY KURZ, NATIONAL TREASURER (Typed Name of Treasurer or Candidate) Stanley Kurz (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 441j (see reverse side of form).

For further information, Contact:



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

or call 800/424-9530

Approved by GAO
B-187620 (R0506)
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.

DETAILED SUMMARY OF RECEIPTS AND EXPENDITURES
(Page 2, FEC FORM 3)

NAME OF CANDIDATE OR COMMITTEE	REPORT COVERING THE PERIOD	
NEW MEXICO UDALL '76 COMMITTEE	FROM: 1/1/76	TO: 12/31/77
RECEIPTS	Column A This Period	Column B Calendar Year-To-Date
COMPREHENSIVE AMENDMENT - ADJUSTMENTS		
14. Contributions from individuals (including contributions in-kind):		
(a) Itemized (use Schedule A)	\$ 3757.20	
(b) Unitemized	\$ 0	
(c) Sales and collections included above: List by event on memo Schedule D (S _____)		
(d) Subtotal of contributions from individuals	\$ 3757.20	\$ 13478.57
15. Transfers from Political Committees:		
(a) Funds from affiliated/authorized committee (itemize on Schedule A regardless of amount)	\$ 0	
(b) Funds from other committees (itemize on Schedule A regardless of amount)	\$ 0	
(c) Contributions in-kind from political committees (itemize on Schedule A regardless of amount)	\$ 0	
(d) Subtotal of transfers in and contributions in-kind from political committees	\$ 0	\$ 4150.00
16. Other Income:		
(a) Itemized (use Schedule A)	\$ 0	
(b) Unitemized	\$ 0	
(c) Subtotal of other income	\$ 0	\$ 0
17. Loans and Loan Repayments Received:		
(a) Itemized (use Schedule A)	\$ 0	
(b) Unitemized	\$ 0	
(c) Subtotal of loans and loan repayments received	\$ 0	\$ 1625.00
Refunds, Rebates, Returns of Deposits:		
(a) Itemized (use Schedule A)	\$ 0	
(b) Unitemized	\$ 0	
(c) Subtotal of refunds, rebates, returns of deposits	\$ 0	\$ 609.22
19. Total Receipts	\$ 3757.20	\$ 19,862.79
EXPENDITURES		
20. Operating Expenditures:		
(a) Itemized (use Schedule B)	\$ 0	
(b) Unitemized	\$ 0	
(c) Subtotal of operating expenditures	\$ 0	\$ 10,851.56
21. Loans, Loan Repayments, and Contribution Refunds Made:		
(a) Itemized (use Schedule B)	\$ 0	
(b) Unitemized	\$ 0	
(c) Subtotal of loans and loan repayments made and contribution refunds	\$ 0	\$ 2971.53
Transfers Out to Political Committees:		
(a) To affiliated/authorized committee (itemize on Schedule B regardless of amount)	\$ 0	
(b) To other committees (itemize on Schedule B regardless of amount)	\$ 0	
(c) Contributions in-kind to other committees (itemize on Schedule B regardless of amount)	\$ 0	
(d) Subtotal of transfers out	\$ 0	\$ 0
23. Independent Expenditures (use Schedule E)	\$ 0	\$
24. Coordinated Expenditures Made by Political Committees (2 U.S.C. 4414(d)) (itemize on Schedule F) - FUNDRAISING EXPENDITURES	\$ 0	\$ 2106.81
25. Total Expenditures	\$ 0	\$ 15,929.90
RECEIPTS AND EXPENDITURES, NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES		
26. Total Receipts (from line 19)	\$ 3757.20	
27. Transfers In (from line 15(a))	\$ 0	
28. Net Receipts (Subtract line 27 from line 26)	\$ 3757.20	
29. Total Expenditures (from line 25)	\$ 0	
30. Transfers Out (from line 22(a))	\$ 0	
31. Net Expenditures (Subtract line 30 from line 29)	\$ 0	

Itemized Receipts,
Contributions, Ticket Purchases, Loans,
Rebates, and Transfers for Line
Numbers 15, 16, 17 and/or 18 of FEC Form 3
(see instructions on back)

Name of Candidate or Committee in full

NEW MEXICO UDALL '76 COMMITTEE - AMENDMENT

Full Name, mailing address and ZIP code	ALTERNATIVE MONTHLY REPORT Date (month, day, year)	Amount of each receipt this period
ROBERT M. AGUILAR PREVIOUSLY OMITTED	2/1/76 - 2/29/76 - ADDITION 2/11/76	105.20
Full Name, mailing address and ZIP code	Occupation	
THOMAS S. UDALL UNIVERSITY OF NEW MEXICO ALBUQUERQUE, N.M.	STUDENT	
THOMAS S. UDALL PREVIOUSLY OMITTED	2/1/76 - 2/29/76 - ADDITION 2/19/76	130.00
THOMAS S. UDALL UNIVERSITY OF NEW MEXICO ALBUQUERQUE, N.M.	STUDENT	
THOMAS S. UDALL PREVIOUSLY OMITTED	3/1/76 - 3/31/76 - ADDITION 3/29/76	72.00
EDWARD E. TRUJIZ LAS CRUCES, N.M.	ATTORNEY	
EDWARD E. TRUJIZ PREVIOUSLY OMITTED	3/1/76 - 3/31/76 - ADDITION 3/15/76	100.00
DOYLE W. PARKER PREVIOUSLY OMITTED	3/1/76 - 3/31/76 - ADDITION 3/16/76	250.00
DOYLE W. PARKER CONTRACTOR		
DERIL PARKER, JR. PREVIOUSLY OMITTED	3/1/76 - 3/31/76 - ADDITION 3/16/76	250.00
DERIL PARKER, JR. RETAIL JEWELER		

Subtotal of receipts this page (optional) \$ 907.20

Total this period (last page this line number only) \$

82040323503

Schedule A

July 1976
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20543

Itemized Receipts,
Contributions, Ticket Purchases, Loans,
Rebates, and Transfers for Line
Numbers 15, 16, 17 and/or 18 of FEC Form 3
(see instructions on back)

Page 2 of 3 for
LINE NUMBER (14a)
(Use separate schedule(s) for each
numbered line)

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Name of Candidate or Committee in full			
NEW MEXICO UDALL '76 COMMITTEE - AMENDMENT			
Full Name, mailing address and ZIP code	<u>ALTERNATIVE MONTHLY REPORT</u> <u>3/1/76 - 3/31/76 - ADDITION</u> <u>PREVIOUSLY OMITTED</u>	Date (month, day, year)	Amount of each receipt this period
<u>ISOBELL PARKER</u>		<u>3/16/76</u>	<u>250.00</u>
Principal place of business	Occupation <u>HOUSEWIFE</u>		
	<input type="checkbox"/> Check if Contributor is self-employed		
	Aggregate Year-to-date ▶ \$		
Full Name, mailing address and ZIP code	<u>ALTERNATIVE MONTHLY REPORT</u> <u>3/1/76 - 3/31/76 - ADDITION</u> <u>PREVIOUSLY OMITTED</u>	Date (month, day, year)	Amount of each receipt this period
<u>DERIL PARKER</u>		<u>3/16/76</u>	<u>250.00</u>
Principal place of business	Occupation		
	<input type="checkbox"/> Check if Contributor is self-employed		
	Aggregate Year-to-date ▶ \$		
Full Name, mailing address and ZIP code	<u>ALTERNATIVE MONTHLY REPORT</u> <u>3/1/76 - 3/31/76 - ADDITION</u> <u>PREVIOUSLY OMITTED</u>	Date (month, day, year)	Amount of each receipt this period
<u>JANIS YAZZI</u>		<u>3/15/76</u>	<u>250.00</u>
Principal place of business	Occupation <u>SILVERSMITH</u>		
	<input type="checkbox"/> Check if Contributor is self-employed		
	Aggregate Year-to-date ▶ \$		
Full Name, mailing address and ZIP code	<u>ALTERNATIVE MONTHLY REPORT</u> <u>3/1/76 - 3/31/76 - ADDITION</u> <u>PREVIOUSLY OMITTED</u>	Date (month, day, year)	Amount of each receipt this period
<u>MAX ORTEGA, III</u>		<u>3/15/76</u>	<u>250.00</u>
Principal place of business	Occupation <u>STUDENT</u>		
	<input type="checkbox"/> Check if Contributor is self-employed		
	Aggregate Year-to-date ▶ \$		
Full Name, mailing address and ZIP code	<u>ALTERNATIVE MONTHLY REPORT</u> <u>3/1/76 - 3/31/76 - ADDITION</u> <u>PREVIOUSLY OMITTED</u>	Date (month, day, year)	Amount of each receipt this period
<u>MAX ORTEGA, JR.</u>		<u>3/15/76</u>	<u>250.00</u>
Principal place of business	Occupation <u>MERCHANT</u>		
	<input type="checkbox"/> Check if Contributor is self-employed		
	Aggregate Year-to-date ▶ \$		
Full Name, mailing address and ZIP code	<u>ALTERNATIVE MONTHLY REPORT</u> <u>3/1/76 - 3/31/76 - ADDITION</u> <u>PREVIOUSLY OMITTED</u>	Date (month, day, year)	Amount of each receipt this period
<u>TIM NEAL</u>		<u>3/15/76</u>	<u>250.00</u>
Principal place of business	Occupation <u>MANUFACTURER</u>		
	<input type="checkbox"/> Check if Contributor is self-employed		
	Aggregate Year-to-date ▶ \$		
Subtotal of receipts (this page optional)			▶ \$ <u>1,500.00</u>
Total this period (last page this line number only)			▶ \$

Schedule A

July 1976
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Itemized Receipts,
Contributions, Ticket Purchases, Loans,
Rebates, and Transfers for Line
Numbers 15, 16, 17 and/or 18 of FEC Form 3
(see instructions on back)

Page 3 of 3 for
LINE NUMBER 14(a)
(Use separate schedule(s) for each
numbered line)

82040323585

Name of Candidate or Committee in full		Date (month, day, year)	Amount of each receipt this period
NEW MEXICO UDALL '76 COMMITTEE - AMENDMENT			
Full Name, mailing address and ZIP code CARL KEMPTON	ALTERNATIVE MONTHLY REPORT 3/1/76 - 3/31/76 - ADDITION PREVIOUSLY OMITTED		
Principal place of business	Occupation TRADER <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$	3/14/76	250.00
Full Name, mailing address and ZIP code O. R. KEMPTON	ALTERNATIVE MONTHLY REPORT 3/1/76 - 3/31/76 - ADDITION PREVIOUSLY OMITTED		
Principal place of business	Occupation RETIRED <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$	3/14/76	250.00
Full Name, mailing address and ZIP code MRS. R. P. O'NEAL	ALTERNATIVE MONTHLY REPORT 3/1/76 - 3/31/76 - ADDITION PREVIOUSLY OMITTED		
Principal place of business	Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$	3/14/76	250.00
Full Name, mailing address and ZIP code PAUL O'NEAL	ALTERNATIVE MONTHLY REPORT 3/1/76 - 3/31/76 - ADDITION PREVIOUSLY OMITTED		
Principal place of business SERVICE STATION	Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$	3/14/76	250.00
Full Name, mailing address and ZIP code MICHAEL HERBLER	ALTERNATIVE MONTHLY REPORT 3/1/76 - 3/31/76 - ADDITION PREVIOUSLY OMITTED		
Principal place of business	Occupation RANCHER <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$	3/31/76	250.00
Full Name, mailing address and ZIP code KIM O'CONNOR	AT THE REQUEST OF THE AUDIT DIVISION, ON DECEMBER 9, 1977, THE COMMITTEE FILED RECORDS FOR MARCH, 1976 - DECEMBER 6, 1977 ADDITION - PREVIOUSLY OMITTED		
Principal place of business	Occupation SOCIAL WORKER <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$	5/7/76	100.00
Subtotal of receipts this page (optional)			\$ 1,350.00
Total this period (last page this line number only)			\$ 3,757.20



December 3, 1979

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

Attn: Charles Steele
Acting General Counsel

Re: MUR 993

Dear Mr. Steele:

The Udall '76 Committee ("the National Committee") is responding to your letter of October 18, 1979, on behalf of the Udall '76 California Committee.

Enclosed please find a Comprehensive Amendment for the year 1976 which includes all matters noted in your letter with the following exceptions:

The Audit Staff kindly provided us with a worksheet (copy enclosed) detailing the previously unitemized expenditures. The National Committee examined the records of the California Committee and found that

1) Check #231 dated April 29, 1976, and made payable to the order of the U.S. Postmaster in the amount of \$130.00 was in fact reported in a timely manner by the Udall '76 California Committee. This expenditure was itemized on their Alternative Monthly Report covering the period from April 1, 1976 through April 30, 1976 on Schedule B, Page 3 for Line 22(a). A copy of this page is enclosed.

2) Check #359 dated June 8, 1976 and made payable to the order of the Gulf Oil Company was in fact in the amount of \$3.20. It seems that the Auditor inadvertently copied down the figure for the checkbook balance. A copy of the checkbook stub is enclosed to illustrate this. The National Committee has included the correct amount in the enclosed amended disclosure report.

Finally, please be advised that documentation for previously unsupported expenditures has been submitted under separate cover.

If you should have any further questions, please contact Mr. Edward Coyle of Congressman Udall's staff, at (202)225-9790.

Sincerely,

Stanley Kurz
STANLEY KURZ
National Treasurer

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**REPORT OF RECEIPTS AND EXPENDITURES
 FOR A CANDIDATE OR COMMITTEE
 SUPPORTING CANDIDATE(S) FOR
 NOMINATION OR ELECTION TO FEDERAL OFFICE**

(Except for Candidates or Committees Receiving Federal Matching Funds)

Note: Committees authorized by a candidate to receive contributions and make expenditures in connection with more than one election must maintain separate records with respect to each election.

1 UDALL '76 CALIFORNIA COMMITTEE 2 I.D. No. _____
 Name of Candidate or Committee (in full) Candidate/Committee
56 UDALL '76 COMMITTEE, 122 EAST 42 STREET 3 _____
 Address (number and street) Office Sought, State/District (if applicable)
NEW YORK, NEW YORK 10017 _____
 City, State and ZIP Code Check if address is different than previously reported. Year of Election _____

4 Type of Report (check appropriate boxes)

April 10 Quarterly Report Tenth day report preceding _____ election
 (primary, general or convention) Termination Report

July 10 Quarterly Report on _____ in the State of _____ Amendment for:
 (date) (which report)

October 10 Quarterly Report Thirtieth day report following _____ election

January 31 Annual Report (primary, general or convention)

Monthly Report _____ on _____ in the State of _____
 (month) (date)

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 This Period	Column B Calendar Year-To-Date
<u>1/1/76</u> Through <u>12/31/76</u>		
6 Cash on hand January 1, 19 <u>COMPREHENSIVE ADJUSTMENT - ADJUSTMENTS</u>		\$ <u>118.25</u>
7 Cash on hand at beginning of reporting period <u>AS REPORTED 6/10/76</u>	\$ <u>311.89</u>	
8 Total receipts (from line 19)	\$ <u>0</u>	\$ <u>40,183.10</u>
(a) Subtotal (Add lines 7 and 8 for Column A and lines 6 and 8 for Column B)	\$ <u>311.89</u>	\$ <u>40,301.35</u>
9 Total expenditures (from line 25)	\$ <u>1917.10</u>	\$ <u>42,218.45</u>
10 Cash on hand at close of reporting period (Subtract line 9 from line 8a)	\$ <u>(1605.21)</u>	\$ <u>(1917.10)</u>
11 Value of contributed items on hand to be liquidated (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.
1/5/79 (Date) STANLEY KURZ, NATIONAL TREASURER (Typed Name of Treasurer or Candidate) [Signature] (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 441j (see reverse side of form).

For further information, Contact:  Federal Election Commission
 1325 K Street, N.W. or call 800/424-9530
 Washington, D.C. 20463 Approved by GAO
 B-187620 (R0506)
 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.

82040323587

DETAILED SUMMARY OF RECEIPTS AND EXPENDITURES
(Page 2, FEC FORM 3)

NAME OF CANDIDATE OR COMMITTEE		REPORT COVERING THE PERIOD	
WALL '76 CALIFORNIA COMMITTEE		FROM: 1/1/76	TO: 12/31/76
RECEIPTS		Column A This Period	Column B Calendar Year-To-Date
COMPREHENSIVE ATTENTION-ADJUSTMENTS			
14. Contributions from individuals (including contributions in-kind):			
(a) Itemized (use Schedule A)	\$ 0		
(b) Unitemized	\$ 0		
(c) Sales and collections included above: List by event on memo Schedule D (S _____)			
(d) Subtotal of contributions from individuals	\$ 0		\$ 37871.64
15. Transfers from Political Committees:			
(a) Funds from affiliated/authorized committee (itemize on Schedule A regardless of amount)	\$ 0		
(b) Funds from other committees (itemize on Schedule A regardless of amount)	\$ 0		
(c) Contributions in-kind from political committees (itemize on Schedule A regardless of amount)	\$ 0		
(d) Subtotal of transfers in and contributions in-kind from political committees	\$ 0		\$ 800.00
16. Other income:			
(a) Itemized (use Schedule A)	\$ 0		
(b) Unitemized	\$ 0		
(c) Subtotal of other income	\$ 0		\$
Loans and Loan Repayments Received:			
(a) Itemized (use Schedule A)	\$ 0		
(b) Unitemized	\$ 0		
(c) Subtotal of loans and loan repayments received	\$ 0		\$ 850.00
Refunds, Rebates, Returns of Deposits:			
(a) Itemized (use Schedule A)	\$ 0		
(b) Unitemized	\$ 0		
(c) Subtotal of refunds, rebates, returns of deposits	\$ 0		\$ 661.46
19. Total Receipts	\$ 0		\$ 40,183.10
EXPENDITURES			
Operating Expenditures:			
(a) Itemized (use Schedule B)	\$ 1917.10		
(b) Unitemized	\$ 0		
(c) Subtotal of operating expenditures	\$ 1917.10		\$ 34787.45
Loans, Loan Repayments, and Contribution Refunds Made:			
(a) Itemized (use Schedule B)	\$ 0		
(b) Unitemized	\$ 0		
(c) Subtotal of loans and loan repayments made and contribution refunds	\$ 0		\$ 600.00
Transfers Out to Political Committees:			
(a) To affiliated/authorized committee (itemize on Schedule B regardless of amount)	\$ 0		
(b) To other committees (itemize on Schedule B regardless of amount)	\$ 0		
(c) Contributions in-kind to other committees (itemize on Schedule B regardless of amount)	\$ 0		
(d) Subtotal of transfers out	\$ 0		\$ 621.27
23. Independent Expenditures (use Schedule E)	\$ 0		\$
24. Coordinated Expenditures Made by Political Committees (2 U.S.C. 441e(d)) (itemize on Schedule F) <i>FUNDRAISING EXPENDITURES</i>	\$ 0		\$ 6209.73
25. Total Expenditures	\$ 1917.10		\$ 42218.45
RECEIPTS AND EXPENDITURES, NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES			
26. Total Receipts (from line 19)	\$ 0		
27. Transfers In (from line 15(a))	\$ 0		
28. Net Receipts (Subtract line 27 from line 26)	\$ 0		
29. Total Expenditures (from line 25)	\$ 1917.10		
30. Transfers Out (from line 22(a))	\$ 0		
31. Net Expenditures (Subtract line 30 from line 29)	\$ 1917.10		

ITEMIZED EXPENDITURES
 (Operating, Transfers Out, Contributions in-Kind,
 Loans, Loan Repayments and Refunds Made)
 Supporting Lines 20a, 21a, and 22a, 22b, and 22c
 of FEC FORM 3

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Name of Candidate or Committee in Full WALL '76 CALIFORNIA COMMITTEE			
AMENDMENT			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
PACIFIC TELEPHONE P.O. BOX 51000 SAN FRANCISCO, CA. 94151 REIMBURSEMENT FOR ALL 3 S.E. PHONES	TERMINATION REPORT ADDITION PREVIOUSLY OMITTED Expenditure for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	6/1/76	433.00
ALBANY PRESS 1151 JOLANO AVENUE ALBANY, CA. 94706 PRINTING	TERMINATION REPORT ADDITION PREVIOUSLY OMITTED Expenditure for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	6/8/76	300.00
ERMA HENNESSY 32 ORD STREET SAN FRANCISCO, CA. 94114 REIMBURSEMENT FOR LABEL LIQUOR	TERMINATION REPORT ADDITION PREVIOUSLY OMITTED Expenditure for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	6/7/76	125.04
ALBANY PRESS 1151 JOLANO AVENUE ALBANY, CA. 94706 PRINTING	TERMINATION REPORT ADDITION PREVIOUSLY OMITTED Expenditure for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	6/14/76	173.39
JOHN WEIDERBACH 5530 DU PONT DRIVE SANTA ROSA, CA. 95405 REIMBURSEMENT FOR EXPENSES	TERMINATION REPORT ADDITION PREVIOUSLY OMITTED Expenditure for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	6/24/76	167.70
JEFF DENNO 1197 EAST JO STREET MERCED, CA. 95340 REIMBURSEMENT FOR EXPENSES	TERMINATION REPORT ADDITION PREVIOUSLY OMITTED Expenditure for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	6/24/76	134.28
JAMES FAY 850 CRESTON ROAD BERKELEY, CA. 94708	TERMINATION REPORT ADDITION PREVIOUSLY OMITTED Expenditure for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	6/24/76	175.52
ARTHUR BLAUSTEIN 410 JAMES FAY 850 CRESTON ROAD BERKELEY, CA. 94708	TERMINATION REPORT ADDITION PREVIOUSLY OMITTED Expenditure for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	6/30/76	180.00
SUBTOTAL of expenditures this page (optional):			\$ 1688.99
TOTAL this period (last page this line number only):			\$

ITEMIZED EXPENDITURES
 (Operating, Transfers Out, Contributions In-Kind,
 Loans, Loan Repayments and Refunds Made)
 Supporting Lines 20a, 21a, and 22a, 22b, and 22c
 of FEC FORM 3

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Name of Candidate or Committee in Full			
WOALL '76 CALIFORNIA COMMITTEE <u>AMENDMENT</u>			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
THE CLITON WORKS 300 BROAD STREET NEVADA CITY, CA. 95959 CAMPAIGN BUTTONS	<u>TERMINATION REPORT</u> <u>ADDITION</u> <u>PREVIOUSLY OMITTED</u> Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	6/30/76	120.50
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
GULF OIL COMPANY HOUSTON, TEXAS EXPENSES FOR A. FORCIER	<u>TERMINATION REPORT</u> <u>ADDITION</u> <u>PREVIOUSLY OMITTED</u> Expenditure for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	6/8/76	3.20
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
AGENCY LITHOGRAPH 1561 VENICE BLVD. LOS ANGELES, CA. 90006 STATIONERY	<u>ALTERNATIVE MONTHLY REPORT</u> <u>2/1/76 - 2/29/76 ADDITION</u> <u>PREVIOUSLY OMITTED</u> Expenditure for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	2/17/76	104.41
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
SUBTOTAL of expenditures this page (optional)			\$ 228.11
TOTAL this period (last page this line number only)			\$ 1917.10

Itemized Expenditures
Campaign Fundraising, Loans, and Transfers
for Lines 20, 21, 22, and/or 23 of FEC Form 3
(see instructions on back)

Name of Candidate or Committee in full
UDALL '76 CALIFORNIA COMMITTEE

Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
U. S. Postmaster (CONTINUED)	stamps for J. Bond party	4/27/76	\$39.00
	1000 stamps for direct mail	4/29/76	\$130.00
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period

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Subtotal of expenditures this page (optional)	▶	\$
Total this period (last page this line number only)	▶	\$ 3,396.61

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1154 70

June 8
to Kelly G. L. Co.

1976

POSTED

expenses for
A. Foreign

TOTAL 3 20

AMOUNT THIS CHECK 1151 70

BALANCE

POSTED

June 8
to T. Place

1976

expenses for
A. Foreign

TOTAL 60 68

AMOUNT THIS CHECK

BALANCE 1091 02

POSTED

June 8
to Arthur P. Quinn

1976

FOR reimbursement travel
expenses

TOTAL

AMOUNT THIS CHECK 128 00

BALANCE 963 02

820403233592

UDALL '76 CALIFORNIA COMMITTEE
8500 WILMERE BLVD., STE. 930 286-8888
LOS ANGELES, CALIF. 90067

359

PAY TO THE ORDER OF Kelly G. L. Co.

Three and 30/100

BANK OF AMERICA
200 MARKET STREET
SAN FRANCISCO, CALIF. 94102

For expenses for A. Foreign

⑆000359⑆ ⑆1220⑉00666 03455⑉00678⑆

⑆0000000320⑆

Jinder Moratti

DOLLARS

June 8, 1976. 1976
\$ 3.20

California U Sell '76 Committee
Required To Be Disclosed

Ch#		Amount	Date
123	Pacific Telephone	433 ⁰⁶	6/1/76
125	Albany Press	300 ⁰⁰	6/8/76
127	Coca Meinweg	125 ⁰⁴	6/7/76
132	Albany Press	173 ³⁹	6/14/76
134	Jon Neudick	147 ⁷⁰	6/24/76
135	Jiff Deans	134 ²⁸	6/24/76
138	James Fay	175 ⁵²	6/24/76
139	Arthur Blaustein	180 ⁰⁰	6/30/76
140	Button Works	120 ⁵⁰	6/30/76
259	Jay Co. Inc.	151⁷⁰	6/8/76
231	U.S. Postmaster	130 ⁰⁰	4/29/76
-	Agency Lithograph	104 ⁴¹	-

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12 @ \$3195⁰⁰

Massachusetts 26

STATEMENT

John W. Murray Company, Inc.

133 Pearl Street Boston, Massachusetts 02110

DATE APR 1 1975

USALL 76 COMM
845 BOYLSTON ST 1ST FL
BCSTON MASS 02116

Interpreted: 6/14/50

DETACH AND RETURN ABOVE STUB WITH YOUR REMITTANCE. CANCELED CHECK IS YOUR RECEIPT.

82040323594

DATE	REFERENCE	DEBIT	CREDIT	BALANCE	OLD BALANCE
FEB 28 75	12455	21.00			
FEB 28 75	12884	63.00			
FEB 28 75	12029	105.00		723.17	
MAR 8 75	12692	677.25		1400.42	
			5/4 CK# 755 200.-		
			5/13 CK# 763 500.-		
			Settled 50 + 1/4		

Freemium Rental



December 3, 1979

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

Attn: Charles Steele
Acting General Counsel

Re: NUR 993

Dear Mr. Steele:

The Udall '76 Committee ("the National Committee") is responding to your letter of October 18, 1979, on behalf of the Massachusetts Udall '76 Committee.

During the course of the Audit, the National Committee has repeatedly tried to contact the Treasurer of the Massachusetts Udall '76 Committee, Ms. Vivian Sue Molina. As of November 1, 1979, we had been unsuccessful in trying to locate her. We have recently learned that she now resides in Georgia.

We have contacted her regarding the matters noted in your letter of October 18, 1979. However, at this time we can not file debt settlement statements and appropriate disclosure reports showing whether the settlements of debts to two corporations was done in a commercially reasonable manner.

The National Committee has written to the two corporations asking them to check their records regarding the above mentioned settlements. Of course, this will take time for reply but as soon as we have received the necessary information we will forward such information along with the required statements of settlement to the Commission.

If you should have any further questions, please contact Mr. Edward Coyle of Congressman Udall's staff, at (202)225-9790.

Sincerely,

Stanley Kurz
STANLEY KURZ
National Treasurer

SK:ejd

cc: Honorable Morris K. Udall
Ms. Vivian Sue Molina, Treasurer
Massachusetts Udall '76 Committee
James D. Pembroke, Esq.

82040323595





December 3, 1979

John W. Murray Company, Inc.
133 Pearl Street
Boston, Massachusetts 02110

Attn: Bookkeeper

Dear Sirs:

The Massachusetts Udall '76 Committee is currently being audited by the Federal Election Commission.

During the course of the audit, it has come to our attention that a debt owed to your company by the Massachusetts Udall '76 Committee was settled for less (85%) than the amount incurred. A copy of the invoice in question is enclosed.

The Federal Election Commission has directed us to obtain the information necessary to determine whether the debt was treated in a commercially reasonable manner.

Would your company please furnish us with a statement indicating the initial terms of credit, the steps taken to satisfy the debt and the details of the debt settlement.

Please mail your letter to us at the following address:

Massachusetts Udall '76 Committee
c/o The Udall '76 Committee
122 East 42nd Street
New York, New York 10017

We appreciate your prompt attention to this matter.
Thank you for your cooperation.

Sincerely,

STANLEY KURZ
National Treasurer

SK:ejd

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UDALL FOR PRESIDENT
 Office of the National Treasurer
 122 East 42 Street, New York, N.Y. 10017 • (212) 697-2233

December 3, 1979

L. Goldstein & Son, Inc.
 244 Brighton Avenue
 Boston (Allston), Massachusetts 02134

Attn: Bookkeeper

Dear Sirs:

The Massachusetts Udall '76 Committee is currently being audited by the Federal Election Commission.

During the course of the audit, it has come to our attention that a debt owed to your company by the Massachusetts Udall '76 Committee was settled for less (20%) than the amount incurred. A copy of the invoice in question is enclosed.

The Federal Election Commission has directed us to obtain the information necessary to determine whether the debt was treated in a commercially reasonable manner.

Would your company please furnish us with a statement indicating the initial terms of credit, the steps taken to satisfy the debt and the details of the debt settlement.

Please mail your letter to us at the following address:

Massachusetts Udall '76 Committee
 c/o The Udall '76 Committee
 122 East 42nd Street
 New York, New York 10017

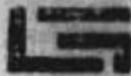
We appreciate your prompt attention to this matter.
 Thank you for your cooperation.

Sincerely,

STANLEY KURZ
 National Treasurer

SK:ejd

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L. GOLDSTEIN & SON, INC.
 244 Brighton Avenue
 Boston (Allston), Massachusetts 02134

TELEPHONE
 687-7874/33

Gle 788

*✓ Under 76
 755 Baylston St.
 Boston, Mass 02116*

PLEASE DETACH AND RETURN WITH YOUR REMITTANCE \$

DATE	REFERENCE NUMBER	DETAIL	BALANCE FORWARD		BALANCE
			CHARGE	CREDIT	
		<i>Bal</i>			<i>369 -</i>
					<i>20%</i>
					<i>73.80</i>

SAFEGUARD BUSINESS FORM NO. 44117W

L. GOLDSTEIN & SON, Inc.
 Boston, Massachusetts 02134

PAY LAST AMOUNT
 IN BALANCE COLUMN

8 2 0 4 0 3 2 3 5 9 8

Payment of \$ 73.80 made.



December 3, 1979

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

Attn: Charles Steele
Acting General Counsel

Re: MUR 993

Dear Mr. Steele:

The Udall '76 Committee ("the National Committee") is responding to your letter of October 18, 1979, on behalf of the Ohio Udall '76 Committee.

As stated in your letter, the Ohio Committee did not keep detailed records of receipts for transfers-in totaling \$59,949.49. The National Committee has once again carefully examined our records and we have found that in fact the National Committee only transferred a total of \$49,949.49 to the Ohio Committee. Since the Audit Staff has thoroughly examined the checkbook, cancelled checks, and ledger sheets of the National Committee, we have not submitted any documentation to support this claim. However, if the FEC would like to examine these receipts again, we shall supply them to the FEC upon request.

The National Committee requested a computer printout of the Ohio State List of contributions received and deposited into the Ohio Committee's accounts. We have enclosed this Ohio 'S' List. The total contributions received by Ohio (as substantiated by the 'S' List) were \$24,121.07. However, the Ohio Committee reported only \$16,555.90 in total contributions received. Thus, the National Committee was able to verify the source of funds totaling \$7,565.17 in receipts which the Ohio Committee may have inadvertently listed as a transfer-in instead of contribution income.

The following is a summary of the figures and calculations quoted above:

Ohio Transfers-In	\$59,949.49
National Transfers-Out	49,949.49
Discrepancy	<u>\$10,000.00</u>



82040323599



Page 2
Federal Election Commission
December 3, 1979

Contributions as per Ohio 'S' List \$24,121.07
Contributions reported by Ohio 16,555.90
\$ 7,565.17

\$10,000.00
(7,565.17)
\$ 2,434.83

Regarding the still unexplained difference of \$2,434.83, the National Committee can not discover the source of the funds. The National Committee presently has possession of the records of the Ohio Committee. However, without the first hand recollections of the Ohio Treasurer, the National Committee can only approximate the details of figures as found in these records.

This discrepancy came to the attention of the National Committee in August of 1976. At that time, we requested that the Ohio Treasurer reexamine the records to determine the source of the funds. The Ohio Treasurer has repeatedly maintained that the records were in good order and has never attempted to explain this difference.

Finally, enclosed please find a Comprehensive Amendment which reflects the above findings and also itemizes expenditures totaling \$14,806.15 which were previously omitted from Ohio Committee reports. Please be advised that two (2) expenditures were itemized as required on the Ohio Committee's report covering the period from June 1, 1976 through July 31, 1976. They are:

- 1) Gestetner Corp. 6/2/76 \$338.13
Reported on Page 1 of 7 for Line 20(a).
See attached copy.
2) Greyhound Bus 6/6/76 \$160.00
Reported on Page 2 of 7 for Line 20(a).
See attached copy.

The following is a summary of the expenditures requiring itemization:

2 Previously reported \$ 498.13
45 Previously omitted 14,806.15
47 Expenditures \$15,304.28



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UDALL FOR PRESIDENT
Office of the National Treasurer
122 East 42 Street, New York, N.Y. 10017 • (212) 682-7670

Page 3
Federal Election Commission
December 3, 1979

If you should have any further questions, please contact Mr. Edward Coyle of Congressman Udall's staff, at (202)225-9790.

Sincerely,

Stanley Kurz
STANLEY KURZ
National Treasurer

SK:ejd

cc: Honorable Morris K. Udall
M.F. Ludewese, Treasurer
Ohio Udall '76 Committee
James D. Pembroke, Esq.

82040323601



**REPORT OF RECEIPTS AND EXPENDITURES
 FOR A CANDIDATE OR COMMITTEE
 SUPPORTING CANDIDATE(S) FOR
 NOMINATION OR ELECTION TO FEDERAL OFFICE**

(Except for Candidates or Committees Receiving Federal Matching Funds)

Note: Committees authorized by a candidate to receive contributions and make expenditures in connection with more than one election must maintain separate records with respect to each election.

1 OHIO UDALL '76 COMMITTEE 2 I.D. No. _____ Candidate/Committee
 Name of Candidate or Committee (in full)
96 UDALL '76 COMMITTEE, 122 EAST 42 STREET PRESIDENCY
 Address (number and street) Office Sought, State/District (if applicable)
NEW YORK, NEW YORK 10017
 City, State and ZIP Code Check if address is different than previously reported. Year of Election 1976

4 Type of Report (check appropriate boxes)

- April 10 Quarterly Report Tenth day report preceding _____ election (primary, general or convention) Termination Report
 July 10 Quarterly Report on _____ in the State of _____ Amendment for: 1976 (which report)
 October 10 Quarterly Report Thirtieth day report following _____ election (primary, general or convention)
 January 31 Annual Report Monthly Report _____ on _____ in the State of _____ (month) (date)
 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 This Period	Column B Calendar Year-To-Date
<u>1/1/76</u> Through <u>12/31/76</u>		
6 Cash on hand January 1, 19 <u>COMPREHENSIVE AMENDMENT-ADJUSTMENTS</u>		\$ 0
7 Cash on hand at beginning of reporting period (As reported 9/15/76)	\$ 0	
8 Total receipts (from line 19)	\$ 0	\$ 76,505.39
(a) Subtotal (Add lines 7 and 8 for Column A and lines 6 and 8 for Column B)	\$ 0	\$ 76,505.39
9 Total expenditures (from line 25)	\$ 14,806.15	\$ 91,311.54
10 Cash on hand at close of reporting period (Subtract line 9 from line 8a)	\$ (14,806.15)	\$ (14,806.15)
11 Value of contributed items on hand to be liquidated (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.

1/5/79
 (Date)

STANLEY KURZ, NATIONAL TREASURER
 (Typed Name of Treasurer or Candidate)

Stanley Kurz
 (Signature of Treasurer or Candidate)

Note: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of U.S.C. Section 437g, or Section 461; (see reverse side of form).

For further information, Contact:

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

or call 800/424-9530

Approved by GAO
 8-187620 (R0506)
 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.

82040323602

DETAILED SUMMARY OF RECEIPTS AND EXPENDITURES
(Page 2, FEC FORM 3)

NAME OF CANDIDATE OR COMMITTEE		REPORT COVERING THE PERIOD	
OHIO WALL '76 COMMITTEE		FROM: 11/1/76	TO: 12/31/76
RECEIPTS		Column A This Period	Column B Calendar Year-To-Date
COMPREHENSIVE AMENDMENT-ADJUSTMENTS			
14. Contributions from Individuals (including contributions in-kind):			
(a) Itemized (use Schedule A)	\$ 0		
(b) Unitemized	\$ 0		
(c) Sales and collections included above:			
List by event on memo Schedule D (S _____)			
(d) Subtotal of contributions from individuals	\$ 0		\$ 24,121.07
15. Transfers from Political Committees:			
(a) Funds from affiliated/authorized committee (itemize on Schedule A regardless of amount)	\$ 0		
(b) Funds from other committees (itemize on Schedule A regardless of amount)	\$ 0		
(c) Contributions in-kind from political committees (itemize on Schedule A regardless of amount)	\$ 0		
(d) Subtotal of transfers in and contributions in-kind from political committees	\$ 0		\$ 49,949.49
16. Other Income:			
(a) Itemized (use Schedule A)	\$ 0		
(b) Unitemized	\$ 0		
(c) Subtotal of other income	\$ 0		\$ 2,434.83
Loans and Loan Repayments Received:			
(a) Itemized (use Schedule A)	\$ 0		
(b) Unitemized	\$ 0		
(c) Subtotal of loans and loan repayments received	\$ 0		\$
Refunds, Rebates, Returns of Deposits:			
(a) Itemized (use Schedule A)	\$ 0		
(b) Unitemized	\$ 0		
(c) Subtotal of refunds, rebates, returns of deposits	\$ 0		\$
22. Total Receipts	\$ 0		\$ 76,505.39
EXPENDITURES			
20. Operating Expenditures:			
(a) Itemized (use Schedule B)	\$ 14,806.15		
(b) Unitemized	\$ 0		
(c) Subtotal of operating expenditures	\$ 14,806.15		\$ 91,198.22
Loans, Loan Repayments, and Contribution Refunds Made:			
(a) Itemized (use Schedule B)	\$ 0		
(b) Unitemized	\$ 0		
(c) Subtotal of loans and loan repayments made and contribution refunds	\$ 0		\$ 0
Transfers Out to Political Committees:			
(a) To affiliated/authorized committee (itemize on Schedule B regardless of amount)	\$ 0		
(b) To other committees (itemize on Schedule B regardless of amount)	\$ 0		
(c) Contributions in-kind to other committees (itemize on Schedule B regardless of amount)	\$ 0		
(d) Subtotal of transfers out	\$ 0		\$ 113.32
23. Independent Expenditures (use Schedule E)	\$ 0		\$ 0
24. Coordinated Expenditures Made by Political Committees (2 U.S.C. 441a(d)) (itemize on Schedule F)	\$ 0		\$ 0
25. Total Expenditures	\$ 14,806.15		\$ 91,311.54
RECEIPTS AND EXPENDITURES, NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES			
26. Total Receipts (from line 19)	\$ 0		
27. Transfers In (from line 15(a))	\$ 0		
28. Net Receipts (Subtract line 27 from line 26)	\$ 0		
29. Total Expenditures (from line 25)	\$ 14,806.15		
30. Transfers Out (from line 22(a))	\$ 0		
31. Net Expenditures (Subtract line 30 from line 29)	\$ 14,806.15		

ITEMIZED EXPENDITURES
 (Operating, Transfers Out, Contributions in-Kind,
 Loans, Loan Repayments and Refunds Made)
 Supporting Lines 20a, 21a, and 22a, 22b, and 22c
 of FEC FORM 3

82040323604

Name of Candidate or Committee in Full OHIO WOALL '76 COMMITTEE <u>AMENDMENT</u>			
Full Name, Mailing Address and ZIP Code DORA CORRADO	Particulars of Expenditure <u>ALTERNATIVE REPORT</u> <u>6/1/76 - 7/31/76 ADDITION</u>	Date (month, day, year) 6/9/76	Amount of each expenditure this period 750.00
	<u>PREVIOUSLY OMITTED</u>	6/9/76	280.00
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	6/2/76	125.00
Full Name, Mailing Address and ZIP Code DAVID GOLDMAN	Particulars of Expenditure <u>ALTERNATIVE REPORT</u> <u>6/1/76 - 7/31/76 ADDITION</u>	Date (month, day, year) 6/5/76	Amount of each expenditure this period 195.95
	<u>PREVIOUSLY OMITTED</u>		
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code BERNIE HAGERTY	Particulars of Expenditure <u>ALTERNATIVE REPORT</u> <u>6/1/76 - 7/31/76 ADDITION</u>	Date (month, day, year) 6/2/76	Amount of each expenditure this period 105.00
	<u>PREVIOUSLY OMITTED</u>		
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code MARY HANLEY JOSE EDWARD STREET ENDICOTT, N.Y. 13260	Particulars of Expenditure <u>ALTERNATIVE REPORT</u> <u>6/1/76 - 7/31/76 ADDITION</u>	Date (month, day, year) 6/2/76	Amount of each expenditure this period 110.00
	<u>PREVIOUSLY OMITTED</u>		
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code GREG HUE	Particulars of Expenditure <u>ALTERNATIVE MONTHLY REPORT</u> <u>5/1/76 - 5/31/76 ADDITION</u>	Date (month, day, year) 5/29/76	Amount of each expenditure this period 100.00
	<u>PREVIOUSLY OMITTED</u>	5/29/76	100.00
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code ELIZABETH HYDE	Particulars of Expenditure <u>ALTERNATIVE REPORT</u> <u>6/1/76 - 7/31/76 ADDITION</u>	Date (month, day, year) 6/2/76	Amount of each expenditure this period 125.00
	<u>PREVIOUSLY OMITTED</u>		
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code KAREN ORLANSKY 7727 ROCKTON AVE. CHEVY CHASE, MD.	Particulars of Expenditure <u>ALTERNATIVE REPORT</u> <u>6/1/76 - 7/31/76 ADDITION</u>	Date (month, day, year) 6/9/76	Amount of each expenditure this period 125.00
	<u>PREVIOUSLY OMITTED</u>		
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code JOHN M. QUINN	Particulars of Expenditure <u>ALTERNATIVE REPORT</u> <u>6/1/76 - 7/31/76 ADDITION</u>	Date (month, day, year) 6/3/76	Amount of each expenditure this period 125.00
	<u>PREVIOUSLY OMITTED</u>		
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
SUBTOTAL of expenditures this page (optional)			\$ 2,140.95
TOTAL this period (last page this line number only)			\$

ITEMIZED EXPENDITURES
 (Operating, Transfers Out, Contributions In-Kind,
 Loans, Loan Repayments and Refunds Made)
 Supporting Lines 20a, 21a, and 22a, 22b, and 22c
 of FEC FORM 3

92040323605

Name of Candidate or Committee in Full			
OHIO WALL '76 COMMITTEE		AMENDMENT	
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
JEROME RAMPOLT	ALTERNATIVE REPORT 6/1/76 - 7/31/76 ADDITION PREVIOUSLY OMITTED	6/3/76	540.00
Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
AL THOMPSON	ALTERNATIVE REPORT 6/1/76 - 7/31/76 ADDITION PREVIOUSLY OMITTED	6/10/76 6/9/76 6/8/76	750.00 200.00 100.00
Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
AL THOMPSON	ALTERNATIVE REPORT 6/1/76 - 7/31/76 ADDITION PREVIOUSLY OMITTED	6/4/76 6/4/76	300.00 700.00
Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
AL THOMPSON	ALTERNATIVE MONTHLY REPORT 5/1/76 - 5/31/76 ADDITION PREVIOUSLY OMITTED	5/29/76 5/28/76	133.93 1,000.00
Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
BETSEY YOUNGSHOLM 5 LOS ANGELES STREET SPRINGFIELD MASS 01107	ALTERNATIVE REPORT 6/1/76 - 7/31/76 ADDITION PREVIOUSLY OMITTED	6/8/76	125.00
Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
MARK YOUNGSHOLM 5 LOS ANGELES STREET SPRINGFIELD, MASS 01107	ALTERNATIVE REPORT 6/1/76 - 7/31/76 ADDITION PREVIOUSLY OMITTED	6/9/76 6/9/76	288.21 125.00
Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
MARK YOUNGSHOLM SAME	ALTERNATIVE REPORT 6/1/76 - 7/31/76 ADDITION PREVIOUSLY OMITTED	6/8/76 6/2/76	130.00 125.00
Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
MARK YOUNGSHOLM SAME	ALTERNATIVE REPORT 6/1/76 - 7/31/76 ADDITION PREVIOUSLY OMITTED	6/4/76	204.28
Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
SUBTOTAL of expenditures this page (optional)			\$ 4,721.42
TOTAL this period (last page this line number only)			\$

ITEMIZED EXPENDITURES
 (Operating, Transfers Out, Contributions In-Kind,
 Loans, Loan Repayments and Refunds Made)
 Supporting Lines 20a, 21a, and 22a, 22b, and 22c
 of FEC FORM 3

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Name of Candidate or Committee in Full			
OHIO UDALL '76 COMMITTEE		AMENDMENT	
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
OHIO BELL TELEPHONE 100 ERIEVIEW PLAZA CLEVELAND, OHIO	ALTERNATIVE REPORT 6/1/76 - 7/31/76 ADDITION	6/4/76	2,400.00
	PREVIOUSLY OMITTED Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
SHELOON SCHECTER	ALTERNATIVE MONTHLY REPORT 4/1/76 - 4/30/76 ADDITION	4/22/76	260.00
	PREVIOUSLY OMITTED Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
22ND DISTRICT CAUCUS	ALTERNATIVE MONTHLY REPORT 5/1/76 - 5/31/76 ADDITION	5/4/76	150.00
	PREVIOUSLY OMITTED Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
BUDGET RENTAL CAR	ALTERNATIVE MONTHLY REPORT 5/1/76 - 5/31/76 ADDITION	5/4/76	106.80
	PREVIOUSLY OMITTED Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
CASH	ALTERNATIVE MONTHLY REPORT 5/1/76 - 5/31/76 ADDITION	5/7/76	150.00
	PREVIOUSLY OMITTED	5/7/76	200.00
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	5/21/76	300.00
DAVID GOLDMAN	ALTERNATIVE MONTHLY REPORT 5/1/76 - 5/31/76 ADDITION	5/24/76	330.00
	PREVIOUSLY OMITTED Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
CLIFFORD PAGE	ALTERNATIVE MONTHLY REPORT 5/1/76 - 5/31/76 ADDITION	5/24/76	126.42
	PREVIOUSLY OMITTED Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
MICHAEL HELLER 39 NANCE ROAD YOUNGSTOWN, OHIO	ALTERNATIVE MONTHLY REPORT 5/1/76 - 5/31/76 ADDITION	5/24/76	300.00
	PREVIOUSLY OMITTED Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
SUBTOTAL of expenditures this page (optional)			\$ 4,323.22
TOTAL this period (last page this line number only)			\$

ITEMIZED EXPENDITURES
 (Operating, Transfers Out, Contributions In-Kind,
 Loans, Loan Repayments and Refunds Made)
 Supporting Lines 20a, 21a, and 22a, 22b, and 22c
 of FEC FORM 3

32040323507

Name of Candidate or Committee in Full OHIO WALL '76 COMMITTEE			
AMENDMENT			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
AMY MARASCO - PETTY CASH	ALTERNATIVE MONTHLY REPORT 5/1/76 - 5/31/76 ADDITION PREVIOUSLY OMITTED Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	5/24/76	500.00
BRADLEY SUTER 596 BROAD STREET ELYRIA, OHIO	ALTERNATIVE MONTHLY REPORT 5/1/76 - 5/31/76 ADDITION PREVIOUSLY OMITTED Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	5/24/76	106.40
RITA BACKER	ALTERNATIVE MONTHLY REPORT 5/1/76 - 5/31/76 ADDITION PREVIOUSLY OMITTED Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	5/26/76	120.00
ALING AND CORY 12555 BERRA ROAD CLEVELAND, OHIO	ALTERNATIVE MONTHLY REPORT 5/1/76 - 5/31/76 ADDITION PREVIOUSLY OMITTED Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	5/26/76	105.16
STEPHEN BENNETT	ALTERNATIVE MONTHLY REPORT 5/1/76 - 5/31/76 ADDITION PREVIOUSLY OMITTED Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	5/26/76	185.00
AMY MARASCO	ALTERNATIVE MONTHLY REPORT 5/1/76 - 5/31/76 ADDITION PREVIOUSLY OMITTED Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	5/26/76	300.00
OHIO BELL TELEPHONE 100 ERIEVIEW PLAZA CLEVELAND, OHIO	ALTERNATIVE MONTHLY REPORT 5/1/76 - 5/31/76 ADDITION PREVIOUSLY OMITTED Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	5/24/76	1200.00
GREYHOUND BUS LINES 1465 CHESTER STREET CLEVELAND, OHIO	ALTERNATIVE MONTHLY REPORT 5/1/76 - 5/31/76 ADDITION PREVIOUSLY OMITTED Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	5/27/76	504.00
SUBTOTAL of expenditures this page (optional)			\$ 3,020.56
TOTAL this period (last page this line number only)			\$

ITEMIZED EXPENDITURES
 (Operating, Transfers Out, Contributions In-Kind,
 Loans, Loan Repayments and Refunds Made)
 Supporting Lines 20a, 21a, and 22a, 22b, and 22c
 of FEC FORM 3

82040323508

Name of Candidate or Committee in Full			
<u>OHIO UDALL '76 COMMITTEE</u> <u>AMENDMENT</u>			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
<u>AL THOMPSON</u>	<u>ALTERNATIVE MONTHLY REPORT</u> <u>5/1/76-5/31/76 ADDITION</u> <u>PREVIOUSLY OMITTED</u>	<u>5/27/76</u>	<u>200.00</u>
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
<u>MICHAEL SPRING</u>	<u>ALTERNATIVE MONTHLY REPORT</u> <u>5/1/76-5/31/76 ADDITION</u> <u>PREVIOUSLY OMITTED</u>	<u>5/27/76</u>	<u>400.00</u>
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
SUBTOTAL of expenditures this page (optional)			\$ <u>600.00</u>
TOTAL this period (last page this line number only)			\$ <u>14,806.15</u>



UDALL FOR PRESIDENT
 Office of the National Treasurer
 122 East 42 Street, New York, N.Y. 10017 • (212) 682-7676

M.F. Ludowese
 P.O. Box 581
 Wooster, Ohio 44691

August 19, 1976

Dear Buck,

The Washington office recently sent up to us the items which you sent to Ed Coyle. We also have in hand the report of receipts and expenditures primarily for the month of June (reports should cover a single month only). In view of the overdraft situation at Central Bank, and possibly at First State Bank, I believe it would be advisable to amend your June report to reflect expenditures only for those items which actually cleared for payment.

For those items which did not clear, and are therefore debts outstanding, we would like to have you reflect them as debts on a schedule C. We will also need a termination report for the month of July indicating that there are no longer funds on hand and that operations are closed down.

In reviewing the receipt side of the second page of the June report, I note that you have claimed \$48,000 for funds transferred in from the National Committee. Your May report claimed \$11,700 in transfers. Our records, which we have reported to the FEC, indicate that we transferred \$14,500 in May and \$35,000 in June to the Ohio Committee. Since there is a substantial difference between what we show, there is a possibility that the FEC may inquire as to what the transfers actually were.

We had a call from the FEC last week indicating their desire to set up a date for an audit of the Campaign books and records for the National committee toward the end of September. Since they may want to go over the reports of the state committees, with us as well, we would like to have these matters cleared up by then.

Sincerely,

Gordon C. Squire
 Gordon C. Squire
 Assistant National Treasurer

*45
14.5
51*

*48.0
11.7
59.7*

could you also send us a copy of the Central Bank National Bank statement for June for documentation in support of matching funds

September 16, 1976

Udall For President
122 East 42 Street
New York, New York 10017

Dear Gordon:

Attached are many things:

1. A corrected 7/31 report. Note that everything I have shows \$59,500 received from National. Your letter shows \$49,500. Please re-check. Al did some strange things, but the Columbus operation did an excellent job on local contributions and could not be off by \$10,000.
2. A final zero balance report.
3. A check for \$113.32 to close the Columbus Account.
4. Numerous bills etc., unpaid; have written these people that you are now responsible.

No way can I show debts outstanding here; I do not know which bad checks you have paid .

Wish we had won; no question but that we backed the best man.

Sincerely,

M. F. (Buck) Ludowese
P. O. Box 581
Wooster, Ohio 44691

82040323610

Itemized Expenditures
Campaign Fundraising, Loans, and Transfers
for Lines 20, 21, 22, and/or 23 of FEC Form 3
(See instructions on back)

Name of Candidate or Committee in full

Udu 11 '76 Committee - Ohio

Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Gestetner Corp. 1738 St. Clair Cleveland, Ohio 44114	Paper & Stamps	5/25/76 6/12/76 6/2/76	168.87 338.13 326.64
		6/7/76 6/4/76	131.98 1,286.36
Peck's Cottages West Lake Rd. Vermilion, Ohio 44089	Lodging	5/25/76	112.32
Cleveland Plaza Euclid & E. 12th Cleveland, Ohio	Lodgings	5/28 5/29	162.00 643.34
Western Reserve Telephone Co. 4908 Main Ave. Cincinnati, Ohio	Phone	5/28	100.00
Virgilia Lanning 16th District, Ohio	Office Rent.	5/29/76	100.00
Walt's Business Equipment Cincinnati, Ohio	Memoranda Supplies	5/29/76	100.00
Agency Rent-A-Car 5651 Pearl Cleveland, Ohio	Auto Rental	5/29	200.00
Subtotal of expenditures this page (optional)			\$ 3,709.64
Total this period (last page this line number only)			\$

1-1-363-204002

Itemized Expenditures
 Campaign Fundraising, Loans, and Transfers
 for Lines 20, 21, 22, and/or 23 of FEC Form 3
 (see instructions on back)

Name of Candidate or Committee in full

1981 76 Committee - Ohio

Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Betty Anne Youngblood 5 Los Angeles St. Springfield, Mass. 01107	Reimburs. misc. expenses	5/24/76	417.53
Columbus Paper & Copy Supply 28 West Fifth Avenue Columbus, Ohio	Office Supplies	5/30/76	110.00
Cleveland Heights Postmaster 2 Cleveland Heights, Ohio	Rating Stays	5/30/76	130.00
Merchant Motors 3161 Euclid Cleveland, Ohio	Rental	5/30/76	300.00
United Clerks Cleveland Hopkins Airport Cleveland, Ohio	Taxes	5/31/76	196.00
Dr. Jackson 755 Lorain Ave. Cleveland, Ohio	Consulting Fee	5/31/76	1,600.00
Kingdom Bus Lines 1465 Chester Cleveland, Ohio	Travel Bus.	6/1/76	112.00
	" "	6/2/76	112.00
	" "	6/2/76	112.00
	" "	6/2/76	112.00
	" "	6/2/76	112.00
	" "	6/7/76	179.50
	" "	6/7/76	324.00
	" "	6/7/76	165.00
	" "	6/7/76	112.00

Subtotal of expenditures this page (optional) ▶ \$ 4,171.03 ✓

Total this period (last page this line number only) ▶ \$



December 3, 1979

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

Attn: Charles Steele
Acting General Counsel

Re: MUR 993

Dear Mr. Steele:

The Udall '76 Committee (~~the~~ National Committee*) is responding to your letter of October 18, 1979, on behalf of the Udall Maryland Campaign.

Enclosed please find a Comprehensive Amendment for the year 1976 which reflects the following matters:

1) The ~~National~~ Committee checked its records regarding the transfers-out to the Udall Maryland Campaign. Our records indicate five (5) transfers-out to the Udall Maryland Campaign totaling \$10,100.00 during the period from March 19, 1976 through September 1, 1976. This leaves a difference of \$1,500.00 which was not included in the FEC Form 3 summary totals on the Maryland committee's reports.

2) The Audit Staff provided us with a worksheet identifying two (2) in-kind contributions totaling \$1,432.00. Although the National Committee does not have bank records, etc. with which to check the accuracy of reported figures, in an examination of the reports filed by the Udall Maryland Campaign for the year 1976, we found that one (1) of the in-kind contributions from Jean Goldstein should be in the amount of \$600.00 and not \$632.00 as identified by the Audit Staff. As taken from the Maryland reports, Jean Goldstein loaned the Maryland committee \$800.00 on April 10, 1976. On August 19, 1976, the Maryland committee paid back \$200.00 to Jean Goldstein and subsequently, the difference of \$600.00 was 'forgiven' by Jean Goldstein.

3) The two (2) refunds received by the Maryland committee from the C & P Telephone company have been itemized as required.

Sincerely,

STANLEY KURZ
National Treasurer

cc: Honorable Morris K. Udall
Raymond Johnston, Treasurer
Maryland Udall Campaign
James D. Pembroke, Esq.



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**REPORT OF RECEIPTS AND EXPENDITURES
 FOR A CANDIDATE OR COMMITTEE
 SUPPORTING CANDIDATE(S) FOR
 NOMINATION OR ELECTION TO FEDERAL OFFICE**

(Except for Candidates or Committees Receiving Federal Matching Funds)

Note: Committees authorized by a candidate to receive contributions and make expenditures in connection with more than one election must maintain separate records with respect to each election.

1 LOAN MARYLAND COMMITTEE 2 I.D. No. _____
 Name of Candidate or Committee (in full) Candidates/Committee
40 LOAN '76 COMMITTEE, 122 EAST 42 STREET 3 RESIDENCY
 Address (number and street) Office Sought, State/District (if applicable)
NEW YORK, NEW YORK 10017
 City, State and ZIP Code Check if address is different than previously reported. Year of Election 1976

4 Type of Report (check appropriate boxes)

- April 10 Quarterly Report Tenth day report preceding _____ election
 (primary, general or convention) Termination Report
 July 10 Quarterly Report on _____ in the State of _____
 (date) Amendment for:
 October 10 Quarterly Report Thirtieth day report following _____ election
 (primary, general or convention) 1976
 (which report)
 January 31 Annual Report Monthly Report _____ on _____ in the State of _____
 (month) (date)
 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 <u>1/1/76</u> Through <u>12/31/76</u>	Column A This Period	Column B Calendar Year-To-Date
6 Cash on hand January 1, 19 <u>COMPREHENSIVE AMENDMENT - ADJUSTMENTS</u>		\$ 0
7 Cash on hand at beginning of reporting period <u>(AS REPORTED 12/31/75)</u>	\$ 438.94	
8 Total receipts (from line 19)	\$ 2,714.22	\$ 38,799.32
(a) Subtotal (Add lines 7 and 8 for Column A and lines 6 and 8 for Column B)	\$ 3,153.16	\$ 38,799.32
9 Total expenditures (from line 25)	\$ 1,400.00	\$ 38,060.38
10 Cash on hand at close of reporting period (Subtract line 9 from line 8a)	\$ 1,753.16	\$ 738.94
11 Value of contributed items on hand to be liquidated (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.

1/15/76
 (Date)

STANLEY KUAZ, NATIONAL TREASURER
 (Typed Name of Treasurer or Candidate)

Stanley KuaZ
 (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 441j (see reverse side of form).

For further information, Contact:



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

or call 800/424-9530

Approved by GAO
 B-187620 (R0506)
 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.

82040323614

DETAILED SUMMARY OF RECEIPTS AND EXPENDITURES
(Page 2, FEC FORM 3)

NAME OF CANDIDATE OR COMMITTEE		REPORT COVERING THE PERIOD	
LOCAL MARYLAND COMMITTEE		FROM: 1/1/76	TO: 12/31/76
RECEIPTS		Column A This Period	Column B Calendar Year-To-Date
COMPREHENSIVE STATEMENT - ADJUSTMENTS			
14. Contributions from individuals (including contributions in-kind):			
(a) Itemized (use Schedule A)	\$ 1,400.00		
(b) Unitemized	\$ 0		
(c) Sales and collections included above:			
List by event on memo Schedule D (8 _____)			
(d) Subtotal of contributions from individuals	\$ 1,400.00		\$ 18,113.50
15. Transfers from Political Committees:			
(a) Funds from affiliated/authorized committee (itemize on Schedule A regardless of amount)	\$ 1,500.00		
(b) Funds from other committees (itemize on Schedule A regardless of amount)	\$ 0		
(c) Contributions in-kind from political committees (itemize on Schedule A regardless of amount)	\$ 0		
(d) Subtotal of transfers in and contributions in-kind from political committees	\$ 1,500.00		\$ 14,500.00
16. Other Income:			
(a) Itemized (use Schedule A)	\$ 0		
(b) Unitemized	\$ 0		
(c) Subtotal of other income	\$ 0		\$
Loans and Loan Repayments Received:			
(a) Itemized (use Schedule A)	\$ (1,400.00)		
(b) Unitemized	\$ 0		
(c) Subtotal of loans and loan repayments received	\$ (1,400.00)		\$ 4,777.00
18. Refunds, Rebates, Returns of Deposits:			
(a) Itemized (use Schedule A)	\$ 1,214.22		
(b) Unitemized	\$ 0		
(c) Subtotal of refunds, rebates, returns of deposits	\$ 1,214.22		\$ 1,408.82
19. Total Receipts	\$ 2,714.22		\$ 38,799.32
EXPENDITURES			
Operating Expenditures:			
(a) Itemized (use Schedule B)	\$ 1,400.00		
(b) Unitemized	\$ 0		
(c) Subtotal of operating expenditures	\$ 1,400.00		\$ 27,679.60
Loans, Loan Repayments, and Contribution Refunds Made:			
(a) Itemized (use Schedule B)	\$ 0		
(b) Unitemized	\$ 0		
(c) Subtotal of loans and loan repayments made and contribution refunds	\$ 0		\$ 9,558.91
Transfers Out to Political Committees:			
(a) To affiliated/authorized committee (itemize on Schedule B regardless of amount)	\$ 0		
(b) To other committees (itemize on Schedule B regardless of amount)	\$ 0		
(c) Contributions in-kind to other committees (itemize on Schedule B regardless of amount)	\$ 0		
(d) Subtotal of transfers out	\$ 0		\$ 0
23. Independent Expenditures (use Schedule E)	\$ 0		\$ 0
24. Coordinated Expenditures Made by Political Committees (2 U.S.C. 4410d) (itemize on Schedule F)	\$ 0		\$ 821.87
<i>FUNDRAISING EXPENDITURES</i>			
25. Total Expenditures	\$ 1,400.00		\$ 38,060.38
RECEIPTS AND EXPENDITURES, NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES			
26. Total Receipts (from line 19)	\$ 2,714.22		
27. Transfers In (from line 15(a))	\$ 1,500.00		
28. Net Receipts (Subtract line 27 from line 26)	\$ 1,214.22		
29. Total Expenditures (from line 25)	\$ 1,400.00		
30. Transfers Out (from line 22(a))	\$ 0		
31. Net Expenditures (Subtract line 30 from line 29)	\$ 1,400.00		

Schedule A

July 1976
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Itemized Receipts,
Contributions, Ticket Purchases, Loans,
Rebates, and Transfers for Line
Numbers 15, 16, 17 and/or 18 of FEC Form 3
(see instructions on back)

Page 1 of 1 for
LINE NUMBER 15(a)
(Use separate schedule(s) for each
numbered line)

Name of Candidate or Committee in full				
WALL MARYLAND CAMPAIGN		AMENDMENT		
Full Name, mailing address and ZIP code WALL 76 COMMITTEE 122 EAST 42 STREET NEW YORK, N.Y. 10017		ALTERNATIVE MONTHLY REPORT 3/1/76 - 3/31/76 ADDITION PREVIOUSLY REPORTED ON LINE 18(a) BUT NOT ITEMIZED	Date (month, day, year) 3/19/76	Amount of each receipt this period 1,100.00
Principal place of business		Occupation NATIONAL COMMITTEE		
		<input type="checkbox"/> Check if Contributor is self-employed		
		Aggregate Year-to-date ▶ \$		
Full Name, mailing address and ZIP code WALL 76 COMMITTEE 122 EAST 42 STREET NEW YORK, N.Y. 10017		ALTERNATIVE MONTHLY REPORT 4/1/76 - 4/30/76 ADDITION PREVIOUSLY OMITTED	Date (month, day, year) 4/5/76	Amount of each receipt this period 1,500.00
Principal place of business		Occupation NATIONAL COMMITTEE		
		<input type="checkbox"/> Check if Contributor is self-employed		
		Aggregate Year-to-date ▶ \$		
Full Name, mailing address and ZIP code WALL 76 COMMITTEE 122 EAST 42 STREET NEW YORK, N.Y. 10017		ALTERNATIVE MONTHLY REPORT 4/1/76 - 4/30/76 ADDITION PREVIOUSLY REPORTED ON LINE 18(a) BUT NOT ITEMIZED	Date (month, day, year) 5/1/76	Amount of each receipt this period 4,000.00
Principal place of business		Occupation NATIONAL COMMITTEE		
		<input type="checkbox"/> Check if Contributor is self-employed		
		Aggregate Year-to-date ▶ \$		
Full Name, mailing address and ZIP code WALL 76 COMMITTEE 122 EAST 42 STREET NEW YORK, N.Y. 10017		ALTERNATIVE MONTHLY REPORT 8/1/76 - 8/31/76 ADDITION PREVIOUSLY REPORTED ON LINE 18(a) BUT NOT ITEMIZED	Date (month, day, year) 8/1/76	Amount of each receipt this period 2,500.00
Principal place of business		Occupation NATIONAL COMMITTEE		
		<input type="checkbox"/> Check if Contributor is self-employed		
		Aggregate Year-to-date ▶ \$		
Full Name, mailing address and ZIP code WALL 76 COMMITTEE 122 EAST 42 STREET NEW YORK, N.Y. 10017		ALTERNATIVE MONTHLY REPORT 9/1/76 - 9/30/76 ADDITION PREVIOUSLY REPORTED ON LINE 18(a) BUT NOT ITEMIZED	Date (month, day, year) 9/1/76	Amount of each receipt this period 1,000.00
Principal place of business		Occupation NATIONAL COMMITTEE		
		<input type="checkbox"/> Check if Contributor is self-employed		
		Aggregate Year-to-date ▶ \$		
Full Name, mailing address and ZIP code		Occupation	Date (month, day, year)	Amount of each receipt this period
Principal place of business		<input type="checkbox"/> Check if Contributor is self-employed		
		Aggregate Year-to-date ▶ \$		
Subtotal of receipts this page (optional)			▶	\$ 10,100.00
Total this period (last page this line number only)			▶	\$ 10,100.00

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Schedule A

July 1978
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

**Itemized Receipts,
Contributions, Ticket Purchases, Loans,
Rebates, and Transfers for Line
Numbers 15, 16, 17 and/or 18 of FEC Form 3**
(see instructions on back)

Page 1 of 1 for
LINE NUMBER 14(a)
(Use separate schedule(s) for each
numbered line)

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Name of Candidate or Committee in full		Date (month, day, year)	Amount of each receipt this period
UDALL MARYLAND COMMITTEE AMENDMENT			
Full Name, mailing address and ZIP code JEAN GOLDSTEIN 6107 CENHURST ROAD BALTIMORE, MARYLAND 21209		ALTERNATIVE MONTHLY REPORT 8/1/76 - 8/31/76 ADDITION PREVIOUSLY REPORTED IN ERROR AS LOAN FORGIVEN	8/25/76 600.00
Principal place of business	Occupation		
	<input type="checkbox"/> Check if Contributor is self-employed		
	Aggregate Year-to-date ▶ \$		
Full Name, mailing address and ZIP code DOUG L STEVENS 3420 PATTERSON ST. NW. WASHINGTON, D.C. 20015		ALTERNATIVE MONTHLY REPORT 8/1/76 - 8/31/76 ADDITION PREVIOUSLY REPORTED IN ERROR AS LOAN FORGIVEN	8/76 800.00
Principal place of business	Occupation		
	<input type="checkbox"/> Check if Contributor is self-employed		
	Aggregate Year-to-date ▶ \$		
Full Name, mailing address and ZIP code		Date (month, day, year)	Amount of each receipt this period
Principal place of business	Occupation		
	<input type="checkbox"/> Check if Contributor is self-employed		
	Aggregate Year-to-date ▶ \$		
Full Name, mailing address and ZIP code		Date (month, day, year)	Amount of each receipt this period
Principal place of business	Occupation		
	<input type="checkbox"/> Check if Contributor is self-employed		
	Aggregate Year-to-date ▶ \$		
Full Name, mailing address and ZIP code		Date (month, day, year)	Amount of each receipt this period
Principal place of business	Occupation		
	<input type="checkbox"/> Check if Contributor is self-employed		
	Aggregate Year-to-date ▶ \$		
Subtotal of receipts this page (optional)			▶ \$ 1,400.00
Total this period (last page this line number only)			▶ \$ 1,400.00

Schedule A

July 1976
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

**Itemized Receipts,
Contributions, Ticket Purchases, Loans,
Rebates, and Transfers for Line
Numbers 15, 16, 17 and/or 18 of FEC Form 3**
(see instructions on back)

Page 1 of 1 for
LINE NUMBER 17(a)
(Use separate schedule(s) for each
numbered line)

Name of Candidate or Committee in full		Date (month, day, year)	Amount of each receipt this period
UDALL MARYLAND COMMITTEE <u>AMENDMENT</u>			
Full Name, mailing address and ZIP code JEAN GOLDSTEIN 6107 BAYHURST ROAD BALTIMORE, MARYLAND 21209	ALTERNATIVE MONTHLY REPORT 8/1/76 - 8/31/76 DELETION CONTRIBUTION ERRONEOUSLY REPORTED AS LOAN FORGIVEN	8/25/76	(600.00)
Principal place of business	Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$		
Full Name, mailing address and ZIP code DOUG L STEVENS 3420 PATTERSON ST, N.W. WASHINGTON, D.C. 20015	ALTERNATIVE MONTHLY REPORT 8/1/76 - 8/31/76 DELETION CONTRIBUTION ERRONEOUSLY REPORTED AS LOAN FORGIVEN	8/76	(800.00)
Principal place of business	Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$		
Full Name, mailing address and ZIP code		Date (month, day, year)	Amount of each receipt this period
Principal place of business	Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$		
Full Name, mailing address and ZIP code		Date (month, day, year)	Amount of each receipt this period
Principal place of business	Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$		
Full Name, mailing address and ZIP code		Date (month, day, year)	Amount of each receipt this period
Principal place of business	Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$		
Full Name, mailing address and ZIP code		Date (month, day, year)	Amount of each receipt this period
Principal place of business	Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$		
Subtotal of receipts this page (optional) ▶			\$ (1,400.00)
Total this period (last page this line number only) ▶			\$ (1,400.00)

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Schedule A

July 1976
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Itemized Receipts,
Contributions, Ticket Purchases, Loans,
Rebates, and Transfers for Line
Numbers 15, 16, 17 and/or 18 of FEC Form 3
(see instructions on back)

Page 1 of 1 for
LINE NUMBER 18(a)
(Use separate schedules for each
numbered line)

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Name of Candidate or Committee in full		Date (month, day, year)	Amount of each receipt this period
WOLL MARYLAND COMMITTEE <u>ALTERNATIVE</u>			
Full Name, mailing address and ZIP code C & P TELEPHONE COMPANY <u>ALTERNATIVE MONTHLY REPORT</u> WHEATON ALA <u>9/1/76 - 9/30/76 ADDITION</u> WHEATON MARYLAND 20902 <u>PREVIOUSLY REPORTED ON</u> <u>LINE 17(a) BUT NOT ITEMIZED</u>		9/1/76 - 9/30/76	488.11
Principal place of business	Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$		
Full Name, mailing address and ZIP code C & P TELEPHONE COMPANY <u>ALTERNATIVE MONTHLY REPORT</u> WHEATON ALA <u>9/1/76 - 9/30/76 ADDITION</u> WHEATON MARYLAND 20902 <u>PREVIOUSLY REPORTED INCORRECTLY</u> <u>ON LINE 18(a) AND NOT ITEMIZED</u>		9/2/76	726.11
Principal place of business	Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$		
Full Name, mailing address and ZIP code		Date (month, day, year)	Amount of each receipt this period
Principal place of business	Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$		
Full Name, mailing address and ZIP code		Date (month, day, year)	Amount of each receipt this period
Principal place of business	Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$		
Full Name, mailing address and ZIP code		Date (month, day, year)	Amount of each receipt this period
Principal place of business	Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$		
Full Name, mailing address and ZIP code		Date (month, day, year)	Amount of each receipt this period
Principal place of business	Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$		
Subtotal of receipts this page (optional) ▶			\$ 1,214.22
Total this period (last page this line number only) ▶			\$

ITEMIZED EXPENDITURES
 (Operating, Transfers Out, Contributions in-Kind,
 Loans, Loan Repayments and Refunds Made)
 Supporting Lines 20a, 21a, and 22a, 22b, and 22c
 of FEC FORM 3

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Name of Candidate or Committee in Full			
<u>WOALL MARYLAND COMMITTEE</u> <u>AMENDMENT</u>			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
<u>JEAN GOLDSTEIN</u> <u>6107 BENKINAST ROAD</u> <u>BALTIMORE, MARYLAND 21209</u> <u>CONTRIBUTION IN-KIND</u>	<u>ALTERNATIVE MONTHLY REPORT</u> <u>3/1/76 - 3/31/76 ADDITION</u> <u>PREVIOUSLY REPORTED IN ERROR</u> <u>AS LOAN</u>	<u>8/25/76</u>	<u>\$ 600.00</u>
	Expenditure for:		
	<input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
<u>DOLY L. STEVENS</u> <u>3420 PATTERSON ST, N.W.</u> <u>WASHINGTON, D.C. 20015</u> <u>CONTRIBUTION IN-KIND</u>	<u>ALTERNATIVE MONTHLY REPORT</u> <u>3/1/76 - 3/31/76 ADDITION</u> <u>PREVIOUSLY REPORTED IN ERROR</u> <u>AS LOAN</u>	<u>8/76</u>	<u>\$ 800.00</u>
	Expenditure for:		
	<input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for:		
	<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for:		
	<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for:		
	<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for:		
	<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for:		
	<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
SUBTOTAL of expenditures this page (optional)			<u>\$ 1,400.00</u>
TOTAL this period (last page this line number only)			<u>\$ 1,400.00</u>



December 3, 1979

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

Attn: Charles Steele
 Acting General Counsel

Re: MUR 993

Dear Mr. Steele:

The Udall '76 Committee ("the National Committee") is responding to your letter of October 18, 1979, on behalf of the Michigan Udall for President Committee.

Supporting documentation for expenditures previously unsupported has been submitted under separate cover.

As regards the alleged violation of the Federal Election Campaign Act of 1971, as amended, Section 434 (b)(9) for failure to itemize as required expenditures to payees aggregating in excess of \$100.00 and totaling \$6,158.55, the National Committee reexamined all the records of the Michigan Committee and has found the following:

That the Michigan Udall for President Committee did, in its Alternative Monthly Report covering the period from May 1, 1976 through May 31, 1976, report the following expenditures as required:

Deluxe Motor Stages	5/6/76	\$208.00
Reported on Page 1 of 20 for Line 20(a).		
See Attachment #1.		
U.S. Postmaster	5/13/76	\$273.00
Reported on Page 3 of 20 for Line 20(a).		
See Attachment #2.		
Mark Youngholm	5/14/76	\$315.00
Reported on Page 19 of 20 for Line 20(a).		
See Attachment #3.		
Avis Rent-a-Car	5/19/76	\$1,164.11
Reported on Page 1 of 20 for Line 20(a).		
See Attachment #4.		



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Page 2
Federal Election Commission
December 3, 1979

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Howard Johnson's Reported on Page 6 of 20 for Line 20(a). See Attachment #5.	5/12/76	\$301.22
North Central Airlines Reported on Page 2 of 20 for Line 20(a). See Attachment #6.	5/16/76	\$324.00
Jean Lightfoot Reported on Page 1 of 1 for Line 21(a). See Attachment #7.	5/19/76	\$250.00
Paul Hollingsworth Reported on Page 12 of 20 for Line 20(a). See Attachment #8.	5/19/76	\$150.00 \$113.49
Ernie Kessler Reported on Page 12 of 20 for Line 20(a). See Attachment #9.	5/19/76	\$109.25
Avis Rent-a-Car Reported on Page 1 of 20 for Line 20(a). See Attachment #4.	5/19/76	\$1,872.13
Gary Mitchell Reported on Page 15 of 20 for Line 20(a). See Attachment #10.	5/19/76	\$251.35

Apparently, it was the practice of the Michigan Committee to report expenditures made to the same payee on the same day by reporting a grand total for that particular day. The Audit Staff seems to have realized that this was the procedure for some of the expenditures but not for others.

Enclosed please find a Comprehensive Amendment for the year 1976 which itemizes the remaining 2 expenditures which were previously omitted.

If you should have any further questions, please call Mr. Edward Coyle of Congressman Udall's staff, at (202)225-9790.

Sincerely,

Stanley Kurz
STANLEY KURZ
National Treasurer

**REPORT OF RECEIPTS AND EXPENDITURES
 FOR A CANDIDATE OR COMMITTEE
 SUPPORTING CANDIDATE(S) FOR
 NOMINATION OR ELECTION TO FEDERAL OFFICE**

(Except for Candidates or Committees Receiving Federal Matching Funds)

Note: Committees authorized by a candidate to receive contributions and make expenditures in connection with more than one election must maintain separate records with respect to each election.

1 MICHIGAN UDALL FOR PRESIDENT COMMITTEE 2 I.D. No. _____ Candidate/Committee
 Name of Candidate or Committee (in full)
5th UDALL '76 COMMITTEE, 122 EAST 42 STREET 3 PRESIDENCY
 Address (number and street) Office Sought, State/District (if applicable)
NEW YORK NEW YORK 10017
 City, State and ZIP Code Check if address is different than previously reported. Year of Election 1976

4 Type of Report (check appropriate boxes)

- April 10 Quarterly Report Tenth day report preceding _____ election (primary, general or convention) Termination Report
 July 10 Quarterly Report on _____ in the State of _____ Amendment for: 1976
 (date) (which report)
 October 10 Quarterly Report Thirtieth day report following _____ election (primary, general or convention)
 January 31 Annual Report Monthly Report _____ on _____ in the State of _____
 (month) (date)
 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 This Period	Column B Calendar Year-To-Date
<u>1/1/76</u> Through <u>12/31/76</u>		
6 Cash on hand January 1, 19 <u>CORRECTIONIVE AMENDMENT - ADJUSTMENTS</u>		\$ 0
7 Cash on hand at beginning of reporting period (As reported 9/30/76)	\$ 0	
8 Total receipts (from line 19)	\$ 0	\$ 83,263.99
(a) Subtotal (Add lines 7 and 8 for Column A and lines 6 and 8 for Column B)	\$ 0	\$ 83,263.99
9 Total expenditures (from line 25)	\$ 827.00	\$ 84,090.99
10 Cash on hand at close of reporting period (Subtract line 9 from line 8a)	\$ (827.00)	\$ (827.00)
11 Value of contributed items on hand to be liquidated (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.
04/1/79 (Date) STANLEY KURTZ, NATIONAL TREASURER (Typed Name of Treasurer or Candidate) Stanley Kurtz (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 441j (see reverse side of form).

For further information, Contact:

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

or call 800/424-9530

Approved by GAO
 B-187620 (R0506)
 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.

82040323623

DETAILED SUMMARY OF RECEIPTS AND EXPENDITURES
(Page 2, FEC FORM 3)

NAME OF CANDIDATE OR COMMITTEE		REPORT COVERING THE PERIOD	
MICHIGAN LOCAL FOR PRESIDENT COMMITTEE		FROM: 1/1/76	TO: 12/31/76
RECEIPTS		Column A This Period	Column B Calendar Year-To-Date
COMPREHENSIVE AMENDMENTS - ADJUSTMENTS			
14. Contributions from Individuals (including contributions in-kind):			
(a) Itemized (use Schedule A)	\$ 0		
(b) Unitemized	\$ 0		
(c) Sales and collections included above:			
List by event on memo Schedule D (\$ _____)			
(d) Subtotal of contributions from individuals	\$ 0		\$ 27,707.03
15. Transfers from Political Committees:			
(a) Funds from affiliated/authorized committees (itemize on Schedule A regardless of amount)	\$ 0		
(b) Funds from other committees (itemize on Schedule A regardless of amount)	\$ 0		
(c) Contributions in-kind from political committees (itemize on Schedule A regardless of amount)	\$ 0		
(d) Subtotal of transfers in and contributions in-kind from political committees	\$ 0		\$ 51,986.50
16. Other income:			
(a) Itemized (use Schedule A)	\$ 0		
(b) Unitemized	\$ 0		
(c) Subtotal of other income	\$ 0		\$ 0
17. Loans and Loan Repayments Received:			
(a) Itemized (use Schedule A)	\$ 0		
(b) Unitemized	\$ 0		
(c) Subtotal of loans and loan repayments received	\$ 0		\$ 2409.21
Refunds, Rebates, Returns of Deposits:			
(a) Itemized (use Schedule A)	\$ 0		
(b) Unitemized	\$ 0		
(c) Subtotal of refunds, rebates, returns of deposits	\$ 0		\$ 1161.25
19. Total Receipts	\$ 0		\$ 83,263.99
EXPENDITURES			
20. Operating Expenditures:			
(a) Itemized (use Schedule B)	\$ 827.00		
(b) Unitemized	\$ 0		
(c) Subtotal of operating expenditures	\$ 827.00		\$ 81,772.41
21. Loans, Loan Repayments, and Contribution Refunds Made:			
(a) Itemized (use Schedule B)	\$ 0		
(b) Unitemized	\$ 0		
(c) Subtotal of loans and loan repayments made and contribution refunds	\$ 0		\$ 2317.58
22. Transfers Out to Political Committees:			
(a) To affiliated/authorized committees (itemize on Schedule B regardless of amount)	\$ 0		
(b) To other committees (itemize on Schedule B regardless of amount)	\$ 0		
(c) Contributions in-kind to other committees (itemize on Schedule B regardless of amount)	\$ 0		
(d) Subtotal of transfers out	\$ 0		\$ 1.00
23. Independent Expenditures (use Schedule E)	\$ 0		\$ 0
24. Coordinated Expenditures Made by Political Committees (2 U.S.C. 441a(d)) (itemize on Schedule F)	\$ 0		\$ 0
25. Total Expenditures	\$ 827.00		\$ 84,090.99
RECEIPTS AND EXPENDITURES, NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES			
26. Total Receipts (from line 19)	\$ 0		
27. Transfers In (from line 15(a))	\$ 0		
28. Net Receipts (Subtract line 27 from line 26)	\$ 0		
29. Total Expenditures (from line 25)	\$ 827.00		
30. Transfers Out (from line 22(a))	\$ 0		
31. Net Expenditures (Subtract line 30 from line 29)	\$ 827.00		

ITEMIZED EXPENDITURES
 (Operating, Transfers Out, Contributions In-Kind,
 Loans, Loan Repayments and Refunds Made)
 Supporting Lines 20a, 21a, and 22a, 22b, and 22c
 of FEC FORM 3

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Name of Candidate or Committee in Full <i>MICHIGAN UDALL FOR PRESIDENT COMMITTEE</i> <u>AMENDMENT</u>			
Full Name, Mailing Address and ZIP Code <i>MARK BRAND 800 LAFAYETTE BLDG. DETROIT, MICH.</i>	Particulars of Expenditure <i>ALTERNATIVE MONTHLY REPORT 5/1/76 - 5/3/76 ADDITION PREVIOUSLY OMITTED</i>	Date (month, day, year) <i>5/14/76</i>	Amount of each expenditure this period <i>227.00</i>
	Expenditure for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code <i>BOB BEDARD 800 LAFAYETTE BLDG. DETROIT, MICH.</i>	Particulars of Expenditure <i>ALTERNATIVE MONTHLY REPORT 5/1/76 - 5/3/76 ADDITION PREVIOUSLY OMITTED</i>	Date (month, day, year) <i>5/14/76</i>	Amount of each expenditure this period <i>600.00</i>
	Expenditure for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
SUBTOTAL of expenditures this page (optional)			\$ <i>827.00</i>
TOTAL this period (last page this line number only)			\$ <i>827.00</i>

Schedule B
 January 1976
 Federal Election Commission
 3325 K Street, N.W.
 Washington, D.C. 20462

Itemized Expenditures
Campaign Fundraising, Loans, and Transfers
for Lines 20, 21, 22, and/or 23 of FEC Form 3
 (see instructions on back)

Page 1 of 20 for
 LINE NUMBER 20(A)
 (Use separate schedules for each numbered line.)

Name of Candidate or Committee in full			
Michigan Udall for President Committee			
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
A.B. Dick Co. Detroit, Mich.	Copier + Supplies	5-4-76 5-7-76 5-10-76 5-13-76	56.27 25.22 54.29 55.59
American Airlines 1205 Washington Blvd. Detroit, Mich. 48226	Transportation	5-9-76 5-10-76 5-14-76 5-16-76	142.00 45.00 141.00 71.00
AVIS Rent-A-Car 1101 Washington Blvd. Detroit, Mich. 48226	Transportation	5-19-76 5-20-76 5-21-76	3036.24 1243.56 262.25
Belcrest Hotel 5440 Cass Ave. Detroit, Mich.	Hotel Rooms	5-5-76 5-10-76 5-14-76 5-19-76	1025.44 1370.61 795.02 6.10
Bell Broadcasting Co. Detroit, Mich.	Advertising	5-12-76 5-14-76 5-17-76	147.50 795.60 382.50
Cory Coffee Oak Park, Mich.	Coffee Machine	5-3-76 5-12-76	73.35 59.08
Delta Airlines 1205 Washington Blvd. Detroit, Mich. 48226	Transportation	5-15-76 5-16-76	160.00 46.00
Deluxe Motor Stages 12379 Cloverdale Detroit, Mich.	Press BUs	5-5-76 5-6-76	100.00 362.00
Subtotal of expenditures this page (optional)			\$ 10445.62
Total this period (last page this line number)			\$

MICHIGAN UDALL FOR PRESIDENT
608 LAFAYETTE BLDG.
DETROIT, MICH. 48226

1135

PAY TO THE ORDER OF

DELUKE MOTOR STAGES

5/6 1976 ~~2.00~~
7/8

\$ 154 ⁰⁰

ONE HUNDRED FIFTY FOUR AND NO CENTS DOLLARS

0 2 0 0 2 2 0 2 2 1

GUARDIAN BUILDING
MICHIGAN NATIONAL BANK
OF DETROIT
DETROIT, MICHIGAN 48226

ilene langyel

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MICHIGAN UDALL FOR PRESIDENT
803 LAFAYETTE BLDG.
DETROIT, MICH. 48226

1134

PAY TO THE ORDER OF

DELUKE MOTOR STAGES

5/6 1976 ~~2.00~~
7/8

\$ 208 ⁰⁰

TWO HUNDRED EIGHT AND NO CENTS DOLLARS

0 2 0 0 2 2 0 0 2 2 1

GUARDIAN BUILDING
MICHIGAN NATIONAL BANK
OF DETROIT
DETROIT, MICHIGAN 48226

ilene langyel

⑆001134⑆ ⑆0720=0080⑆ 0007=1206=7⑆ ⑆000020800⑆

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5-2-0-0
1-1-0-0

82040323628

MICHIGAN UDALL FOR PRESIDENT
808 LAFAYETTE BLDG.
DETROIT, MICH. 48226

1714

5-19 10 76 $\frac{2-80}{720}$

PAY TO THE ORDER OF

Avis - Rent-A-Car

\$1,164.11

one thousand one hundred sixty-four and $\frac{11}{100}$ DOLLARS



GUARDIAN BUILDING
MICHIGAN NATIONAL BANK
OF DETROIT
DETROIT, MICHIGAN 48226

51106261

Richard S. Rowntree

⑆001714⑆ ⑆0720⑉0080⑆ 0007⑉1206⑉7⑆ ⑆0000116411⑆

MICHIGAN UDALL FOR PRESIDENT
808 LAFAYETTE BLDG.
DETROIT, MICH. 48226

1705

May 19 10 76 $\frac{2-80}{720}$

PAY TO THE ORDER OF

Avis Rental Car

\$1,872 $\frac{13}{100}$

One Thousand Eight Hundred and Seventy-Two $\frac{13}{100}$ DOLLARS



GUARDIAN BUILDING
MICHIGAN NATIONAL BANK
OF DETROIT
DETROIT, MICHIGAN 48226

51106261

Richard S. Rowntree

⑆001705⑆ ⑆0720⑉0080⑆ 0007⑉1206⑉7⑆ ⑆0000187213⑆

11611
107213

Schedule B

January 1976
Federal Election Commission
335 K Street, N.W.
Washington, D.C. 20463

Itemized Expenditures
Campaign Fundraising, Loans, and Transfers
for Lines 20, 21, 22, and/or 23 of FEC Form 3
(see instructions on back)

Page 3 of 20 for
LINE NUMBER 20 (A)
(Use separate schedule(s) for each numbered line).

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Name of Candidate or Committee in full			
Michigan Udall for President Committee			
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Northwest Airlines 1235 Washington Blvd. Detroit, Mich.	Shipping + Transportation	5-7-76 5-10-76 5-18-76	84.15 48.30 82.00
Sheraton Motor Hotel Flint, Michigan	Rent	5-10-76	216.00
Sislin Splane Co. Detroit, Michigan	Offset Machine	5-4-76	400.00
Tarta Bus Co. Toledo, Ohio	Press Bus	5-15-76	160.00
Travel By Harrington	Press BUS	5-10-76	107.00
U. S. Postmaster Detroit, Mich.	Postage	5-3-76 5-4-76 5-6-76	104.00 81.25 182.00
Same	—	5-8-76 5-10-76 5-11-76	234.00 184.00 130.00
Same	—	5-12-76 5-13-76	208.00 600.65
Subtotal of expenditures this page (optional)			\$ 2821.35
Total this period (last page this line number only)			\$

156.00

26.65

65.00

80.00

273.00

600.65

MICHIGAN UDALL FOR PRESIDENT

803 LAFAYETTE BLDG.

DETROIT, MICH. 48226

1337

May 13 1976 ⁹⁻⁸⁰/₇₂₀

U.S. Postmaster - Mt Clemens \$156.00

one hundred-fifty-six and 00/100 DOLLARS



GUARDIAN BUILDING
MICHIGAN NATIONAL BANK
OF DETROIT
DETROIT, MICHIGAN 48226

Alfred B. [Signature]

⑆001337⑆ ⑆0720=0080⑆ 0007=1206=7⑆

⑆0000015600⑆

82040323630

MICHIGAN UDALL FOR PRESIDENT

803 LAFAYETTE BLDG.

DETROIT, MICH. 48226

1346

May 13 1976 ⁹⁻⁸⁰/₇₂₀

PAY TO THE ORDER OF

U.S. Postmaster - Detroit \$26.65

twenty-six and 65/100 DOLLARS



GUARDIAN BUILDING
MICHIGAN NATIONAL BANK
OF DETROIT
DETROIT, MICHIGAN 48226

72012103621

ilene lenquet

⑆001346⑆ ⑆0720=0080⑆ 0007=1206=7⑆

⑆0000002665⑆

MICHIGAN UDALL FOR PRESIDENT
803 LAFAYETTE BLDG.
DETROIT, MICH. 48226

1362

PAY TO THE ORDER OF

U.S. POSTMASTER - DETROIT

MAY 13 1976 8-80/720

\$65.00

SIXTY FIVE AND NO CENTS

DOLLARS



GUARDIAN BUILDING
MICHIGAN NATIONAL BANK
OF DETROIT
DETROIT, MICHIGAN 48226

45512700521
Allen B. [Signature]

⑆001362⑆ ⑆0720⑉0080⑆ 0007⑉1206⑉7⑆ ⑆0000006500⑆

MICHIGAN UDALL FOR PRESIDENT
803 LAFAYETTE BLDG.
DETROIT, MICH. 48226

1356

PAY TO THE ORDER OF

U.S. Postmaster - Utica

MAY 13 1976 8-80/720

\$80.00

eighty and 00/100

DOLLARS



GUARDIAN BUILDING
MICHIGAN NATIONAL BANK
OF DETROIT
DETROIT, MICHIGAN 48226

⑆600220601⑆
Gene [Signature]

⑆001356⑆ ⑆0720⑉0080⑆ 0007⑉1206⑉7⑆ ⑆0000008000⑆

MICHIGAN UDALL FOR PRESIDENT
803 LAFAYETTE BLDG.
DETROIT, MICH. 48226

1351

PAY TO THE ORDER OF

Postmaster - Detroit

MAY 13 1976 8-80/720

\$273.00

two hundred seventy-three and 00/100

DOLLARS



GUARDIAN BUILDING
MICHIGAN NATIONAL BANK
OF DETROIT
DETROIT, MICHIGAN 48226

551606421
Allen B. [Signature]

⑆001351⑆ ⑆0720⑉0080⑆ 0007⑉1206⑉7⑆ ⑆0000027300⑆

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Schedule B
January 1976
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Itemized Expenditures
Campaign Fundraising, Loans, and Transfers
for Lines 20, 21, 22, and/or 23 of FEC Form 3
(see instructions on back)

Page 17 of 20
LINE NUMBER 20(A)
(Use separate schedule(s) for each numbered line).

Name of Candidate or Committee in full			
Michigan Udall for President			
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Alan Wohlstetter 800 Lafayette Bldg. Detroit, Mich.	Exp. Reimb, pers. Serv. - Travel Reimb.	5-3-76	16.98
		5-7-76	50.00
		5-14-76	50.00
		5-19-76	91.60
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
William Yancy 800 Lafayette Bldg. Detroit, Mich.	Pers. Serv. + Exp. Reimb.	5-7-76	100.00
		5-14-76	100.00
		5-19-76	100.00
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Betsy Youngholm 800 Lafayette Bldg. Detroit, Mich.	Pers. Serv, Exp. Reimb. - Travel Exp.	5-7-76	100.00
		5-11-76	87.91
		5-12-76	17.00
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Same	_____	5-14-76	162.47
		5-19-76	156.35
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Mark Youngholm 800 Lafayette Bldg. Detroit, Mich.	Exp. Reimb, pers Serv. - Travel Adv.	5-3-76	62.15
		5-10-76	100.00
		5-12-76	30.63
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Same	_____	5-13-76	155.00
		5-19-76	440.00
		5-18-76	643.61
		5-15-76	91.12
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
David Youngquist 800 Lafayette Detroit, Mich.	Exp. Reimb.	5-18-76	200.00
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Debbie Zurkow 800 LAFAYETTE BLDG DETROIT, MI	Exp. Reimb, pers Serv. - Travel Adv.	5-6-76	50.00
		5-7-76	35.00
		5-11-76	25.00
		5-12-76	11.72
		5-14-76	55.00
Subtotal of expenditures this page (optional).....			\$ 3115.56
Total this period (last page this line number only).....			\$

MICHIGAN UDALL FOR PRESIDENT
803 LAFAYETTE BLDG.
DETROIT, MICH. 48226

1402

PAY
TO THE
ORDER OF

Mark Youngholm

May 14 1976 $\frac{8.00}{720}$

\$ 125.00

one hundred - twenty - five and 00/100 DOLLARS



GUARDIAN BUILDING
MICHIGAN NATIONAL BANK
OF DETROIT
DETROIT, MICHIGAN 48226

8324

Laurence R. Howell

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MICHIGAN UDALL FOR PRESIDENT
803 LAFAYETTE BLDG.
DETROIT, MICH. 48226

1440

PAY
TO THE
ORDER OF

Mark Youngholm

5-14 1976 $\frac{8.00}{720}$

\$ 315.00

Three hundred fifteen and 00/100 DOLLARS



GUARDIAN BUILDING
MICHIGAN NATIONAL BANK
OF DETROIT
DETROIT, MICHIGAN 48226

8

8322

315000

Laurence R. Howell

⑆00 1440⑆ • ⑆0720⑆=0080⑆ 0007⑆=1206⑆=7⑆

⑆0000031500⑆

125.00
315.00

Schedule B
January 1976
Federal Election Commission
1225 N Street, N.W.
Washington, D.C. 20463

Itemized Expenditures
Campaign Fundraising, Loans, and Transfers
for Lines 20, 21, 22, and/or 23 of FEC Form 3
(see instructions on back)

Page 6 of 20
LINE NUMBER 20A
(Use separate schedules for each numbered line.)

Name of Candidate or Committee in full			
Michigan Udall for President Committee			
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Greyhound Lines 211 W. Fort St. Detroit, Mich.	Press Bus	5-14-76 5-15-76 5-16-76 5-18-76	310.90 155.15 262.15 107.00
Harmonic Club Detroit, Mich.	Rent	5-5-76	300.00
Hi-Way American, Inc. 2311 E. Vernor Hwy. Detroit, Mich.	Press Bus	5-10-76 5-11-76 5-12-76 5-13-76	150.00 200.00 250.00 140.00
Howard Johnson's Washington Blvd. Detroit, Mich. 48226	Hotel Rooms	5-12-76 5-14-76 5-15-76 5-16-76 5-20-76	365.70 183.75 251.79 35.00 272.98
Inter-State Photo 2317 Woodward Berkeley, Mich..	Paper for Copier	5-3-76 5-10-76 5-18-76	194.42 194.42 127.80
Jewish News 17515 W. Nine Mile Rd. Southfield, Mich.	Advertising	5-11-76	302.40
Kolosso Printing Ann Arbor, Mich.	Printing	5-10-76 5-11-76 5-12-76 5-17-76	312.00 624.00 150.00 1450.00
Lafayette Building Detroit, Mich. 48226	Rent	5-12-76 5-14-76	132.74 148.20
Subtotal of expenditures this page (optional)			\$ 6946.46
Total this period (last page this line number only)			\$

64.48
MICHIGAN UDALL FOR PRESIDENT
365.78
803 LAFAYETTE BLDG.
DETROIT, MICH. 48226

1328

PAY TO THE ORDER OF

May 12 1976 ²⁻⁸⁰/₇₂₀
Howard Johnson's Hotel \$64.48
Sixty-four and 4/100 DOLLARS

GUARDIAN BUILDING
MICHIGAN NATIONAL BANK
OF DETROIT
DETROIT, MICHIGAN 48226

ilene languel

⑆001328⑆ ⑆0720⑆0080⑆ 0007⑆1206⑆7⑆ ⑆0000006448⑆

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MICHIGAN UDALL FOR PRESIDENT
803 LAFAYETTE BLDG.
DETROIT, MICH. 48226

1330

PAY TO THE ORDER OF

May 12 1976 ²⁻⁸⁰/₇₂₀
Howard Johnson's New Center \$30.22
Three hundred and twenty-two cents DOLLARS

GUARDIAN BUILDING
MICHIGAN NATIONAL BANK
OF DETROIT
DETROIT, MICHIGAN 48226

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ilene languel

⑆001330⑆ ⑆0720⑆0080⑆ 0007⑆1206⑆7⑆ ⑆000003022⑆

MICHIGAN UDALL FOR PRESIDENT

1508

162.00 LAFAYETTE BLDG.

162.00 DETROIT, MICH. 48226

54.00

370.00 T

May 16 1976 $\frac{9-80}{720}$

PAY TO THE ORDER OF

North Central Airlines \$162.00

one hundred - sixty two and 00/100 DOLLARS



GUARDIAN BUILDING 40590229
MICHIGAN NATIONAL BANK
OF DETROIT
DETROIT, MICHIGAN 48226

ALAN B. SHUF

⑆001508⑆ ⑆0720⑉0080⑆ 0007⑉1206⑉7⑆ ⑆0000016200⑆

MICHIGAN UDALL FOR PRESIDENT

1507

803 LAFAYETTE BLDG.

DETROIT, MICH. 48226

May 16 1976 $\frac{9-80}{720}$

PAY TO THE ORDER OF

North Central Airlines \$162.00

one hundred - sixty - two and 00/100 DOLLARS



GUARDIAN BUILDING 40590230
MICHIGAN NATIONAL BANK
OF DETROIT
DETROIT, MICHIGAN 48226

ALAN B. SHUF

⑆001507⑆ ⑆0720⑉0080⑆ 0007⑉1206⑉7⑆ ⑆0000016200⑆

MICHIGAN UDALL FOR PRESIDENT

1513

803 LAFAYETTE BLDG.

DETROIT, MICH. 48226

May 16 1976 $\frac{9-80}{720}$

PAY TO THE ORDER OF

North Central Airlines \$54.00

fifty - four and 00/100 DOLLARS



GUARDIAN BUILDING 44430137
MICHIGAN NATIONAL BANK
OF DETROIT
DETROIT, MICHIGAN 48226

ALAN B. SHUF

⑆001513⑆ ⑆0720⑉0080⑆ 0007⑉1206⑉7⑆ ⑆0000005400⑆

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Schedule B
January 1976
Federal Election Commission
1225 K Street, N.W.
Washington, D.C. 20463

**Itemized Expenditures
Campaign Fundraising, Loans, and Transfers
for Lines 20, 21, 22, and/or 23 of FEC Form 3**
(see instructions on back)

Page 2 of 20
LINE NUMBER 2(A)
(Use separate schedule(s) for each numbered line.)

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Name of Candidate or Committee in full			
Michigan Udall for President Committee			
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Likity Split Printing Inc. 20441 James Couzens Detroit, Mich.	Printing	5-11-76 5-14-76 5-27-76	200.00 250.00 500.00
Mercury Bus Lines	press BUS	5-12-76	107.00
Michigan Bell Telephone Co. Detroit, Mich.	Telephones	5-5-76 5-7-76 5-10-76	140.00 697.68 600.00
Same	—	5-11-76 5-14-76	1600.00 1085.79
McCawley Office Supplies Green & Shopping Center Oak Park, Mich.	Office Supplies	5-4-76 5-6-76	87.25 88.12
National Reproductions 433 E. Larned Detroit, Mich. 48226	Printing	5-7-76 5-11-76 5-17-76	39.00 71.00 350.00
North Central Airlines 20600 Eureka Taylor, Mich.	Shipping + Transportation	5-11-76 5-16-76 5-17-76	78.25 378.00 3523.80
North Star Line	press BUS	5-5-76	105.00
Subtotal of expenditures this page (optional)			\$ 9901.39
Total this period (last page this line number only)			\$

Schedule B
January 1976
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20443

Itemized Expenditures
Campaign Fundraising, Loans, and Transfers
for Lines 20, 21, 22, and/or 23 of FEC Form 3
(see instructions on back)

Page 1 of 1 for
LINE NUMBER 21(A)
(Use separate schedule(s) for each
numbered line.)

Name of Candidate or Committee in full

MICHIGAN VOICE FOR PRESIDENT

Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
DAVID RUANS 800 LAFAYETTE BLDG. DETROIT, MI	LOAN REPAYMENT	5-19	\$150.
JEAN LIGHTFOOT 800 LAFAYETTE BLDG. DETROIT, MI	LOAN REPAYMENT	5-19	\$250.00

82040323638

Subtotal of expenditures this page (optional) ▶ \$ 400

Total this period (last page this line number only) ▶ \$ 400

MICHIGAN UDALL FOR PRESIDENT

1627

503 LAFAYETTE BLDG.

DETROIT, MICH. 48226

5-19 1976 $\frac{2-20}{720}$

PAY TO THE ORDER OF

Jean Lightfoot

\$250.00

Two hundred fifty and 9/100 ~~50000~~ DOLLARS



GUARDIAN BUILDING
MICHIGAN NATIONAL BANK
OF DETROIT
DETROIT, MICHIGAN 48226

Laurene R. Howell

⑆001627⑆ ⑆0720⑆0080⑆ 0007⑆1206⑆7⑆

⑆0000025000⑆

82040323539

ATTACHMENT #8 AND ATTACHMENT #9
Itemized Expenditures
Campaign Fundraising, Loans, and Transfers
for Lines 20, 21, 22, and/or 23 of FEC Form 3
(see instructions on back)

Page 12 of 20
LINE NUMBER 20A
(Use separate schedules) for each numbered line.

Name of Candidate or Committee in full

MICHIGAN UDALL FOR PRESIDENT

Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
MARK HELLER 800 LAFAYETTE DETROIT, MI.	PER SERV, EXP REIMB. & TRAVEL ADVANCE	5-7 5-14 5-19	50.00 50.00 101.70
L. KIM HOACLAND DETROIT, MI.	CAMPAIGN EXP.	5-14	100.00
PAUL HOLLINGS WORTH 800 LAFAYETTE DETROIT, MI.	PER SERV, EXP. REIMB. RENT EXP. & TRAVEL ADV.	5-7 14 19	175.00 75.00 352.34
PATRICE HORSTMAN SAME AS ABOVE	PER SERV, EXP REIMB. & TRAVEL ADVANCE	5-3 7 19	56.34 100.00 143.00
IRA JACKSON BOSTON, MASS.	CONSULTING FEE, & EXP. REIMB.	5-8 11 12	500.00 100.00 186.00
MILDRED JEFFERY SOUTHFIELD, MI.	CAR RENTAL	5-11	100.00
MARY JEROME NATIONAL COMMITTEE WASHINGTON, D.C.	ADVANCE EXP.	5-4 7 15	18.00 50.00 40.00
ERNIE KESSLER 800 LAFAYETTE DETROIT, MI.	EXP. REIMB. & TRAVEL ADVANCE, PER SERV.	5-3 7 12 14 19	251.57 75.00 80.42 75.00 337.02
Subtotal of expenditures this page (optional)			\$ 3016.39
Total this period (last page this line number only)			\$

MICHIGAN UDALL FOR PRESIDENT
608 LAFAYETTE BLDG.
DETROIT, MICH. 48226

1595

PAY TO THE ORDER OF

Paul Hollingsworth

5-19 1976 $\frac{9-80}{720}$

\$ 88.85

Eighty-eight and 85/100

DOLLARS



GUARDIAN BUILDING
MICHIGAN NATIONAL BANK
OF DETROIT
DETROIT, MICHIGAN 48226

Lawrence R. Howard

⑆001595⑆ ⑆0720⑆0080⑆ 0007⑆1206⑆7⑆ ⑆0000008885⑆

88.85
150.00
113.49
352.34 T

MICHIGAN UDALL FOR PRESIDENT
608 LAFAYETTE BLDG.
DETROIT, MICH. 48226

1659

PAY TO THE ORDER OF

Paul Hollingsworth

5-19 1976 $\frac{9-80}{720}$

\$ 150.00

One hundred fifty and 00/100

DOLLARS



GUARDIAN BUILDING
MICHIGAN NATIONAL BANK
OF DETROIT
DETROIT, MICHIGAN 48226

Lawrence R. Howard

⑆001659⑆ ⑆0720⑆0080⑆ 0007⑆1206⑆7⑆ ⑆0000015000⑆

MICHIGAN UDALL FOR PRESIDENT
608 LAFAYETTE BLDG.
DETROIT, MICH. 48226

1702

PAY TO THE ORDER OF

Paul Hollingsworth

5-19 1976 $\frac{9-80}{720}$

\$ 113.49

One hundred thirteen and 49/100

DOLLARS



GUARDIAN BUILDING
MICHIGAN NATIONAL BANK
OF DETROIT
DETROIT, MICHIGAN 48226

Lawrence R. Howard

⑆001702⑆ ⑆0720⑆0080⑆ 0007⑆1206⑆7⑆ ⑆0000011349⑆

82040323641

MICHIGAN UDALL FOR PRESIDENT
908 LAFAYETTE BLDG.
DETROIT, MICH. 48226

1718

PAY
TO THE
ORDER OF

Ernie Kesler

5-19 1976 $\frac{2}{100}$

\$104.42

One hundred four and 42/100

DOLLARS



GUARDIAN BUILDING
MICHIGAN NATIONAL BANK
OF DETROIT
DETROIT, MICHIGAN 48226

Laurence R. Horvath

⑆001718⑆ ⑆0720⑉0080⑆ 0007⑉1206⑉7⑆

⑆000010442⑆

MICHIGAN UDALL FOR PRESIDENT
908 LAFAYETTE BLDG.
DETROIT, MICH. 48226

1700

PAY
TO THE
ORDER OF

Ernie Kesler

5-19 1976 $\frac{25}{100}$

\$109.25

One hundred nine and 25/100

DOLLARS



GUARDIAN BUILDING
MICHIGAN NATIONAL BANK
OF DETROIT
DETROIT, MICHIGAN 48226

6617216041

Laurence R. Horvath

⑆001700⑆ ⑆0720⑉0080⑆ 0007⑉1206⑉7⑆

⑆000010925⑆

MICHIGAN UDALL FOR PRESIDENT
608 LAFAYETTE BLDG.
DETROIT, MICH. 48226

1661

PAY
TO THE
ORDER OF

Ernie Kessler

5-19 1976 $\frac{2-00}{720}$

\$ 75.00

Seventy five and 00/100

DOLLARS



GUARDIAN BUILDING
MICHIGAN NATIONAL BANK
OF DETROIT
DETROIT, MICHIGAN 48226

75000007500

0 7 5 1 2 7 1 6 0 1 1

Lawrence K. Howard

⑆001661⑆ ⑆:0720-0080⑆ 0007-1206-7⑆

⑆0000007500⑆

MICHIGAN UDALL FOR PRESIDENT
608 LAFAYETTE BLDG.
DETROIT, MICH. 48226

1579

PAY
TO THE
ORDER OF

Ernie Kessler

5-19 1976 $\frac{2-00}{720}$

\$ 48.35

Fort-eight and 35/100

DOLLARS



GUARDIAN BUILDING
MICHIGAN NATIONAL BANK
OF DETROIT
DETROIT, MICHIGAN 48226

0 7 5 1 2 7 1 6 0 1 1

Lawrence K. Howard

⑆001579⑆ ⑆:0720-0080⑆ 0007-1206-7⑆

⑆0000004835⑆

MICHIGAN UDALL FOR PRESIDENT
808 LAFAYETTE BLDG.
DETROIT, MICH. 48226

1573

PAY TO THE ORDER OF

Gary Mitchell

5-19 1976 $\frac{2-00}{720}$

\$ 43.75

Forty-three and 75/100

DOLLARS



GUARDIAN BUILDING
MICHIGAN NATIONAL BANK
OF DETROIT
DETROIT, MICHIGAN 48226

7 5 2 2 2 2 2 2 2 2 1
Laurence R. Howell

⑆001573⑆ ⑆0720-0080⑆ 0007-1206-7⑆ ⑆0000004375⑆

MICHIGAN UDALL FOR PRESIDENT
808 LAFAYETTE BLDG.
DETROIT, MICH. 48226

1666

PAY TO THE ORDER OF

Gary Mitchell

5-19 1976 $\frac{2-00}{720}$

\$ 50.00

Fifty and 00/100

DOLLARS



GUARDIAN BUILDING
MICHIGAN NATIONAL BANK
OF DETROIT
DETROIT, MICHIGAN 48226

1 4 9 1 1 1 1 1 6 1 1 1
Laurence R. Howell

⑆001666⑆ ⑆0720-0080⑆ 0007-1206-7⑆ ⑆0000005000⑆

MICHIGAN UDALL FOR PRESIDENT
808 LAFAYETTE BLDG.
DETROIT, MICH. 48226

1711

PAY TO THE ORDER OF

Gary Mitchell

5-19 1976 $\frac{2-00}{720}$

\$ 251.35

Two hundred fifty-one and 35/100

DOLLARS



GUARDIAN BUILDING
MICHIGAN NATIONAL BANK
OF DETROIT
DETROIT, MICHIGAN 48226

1 4 3 6 2 2 2 2 2 2 2 1
Laurence R. Howell

⑆001711⑆ ⑆0720-0080⑆ 0007-1206-7⑆ ⑆0000025135⑆

8 2 0 4 0 3 2 3 6 4 4

Schedule B
January 1976
Federal Election Commission
1300 N Street, N.W.
Washington, D.C. 20443

Itemized Expenditures
Campaign Fundraising, Loans, and Transfers
for Lines 20, 21, 22, and/or 23 of FEC Form 3
(See Instructions on back)

Page 15 of 20
LINE NUMBER 10(A)
(Use separate schedule(s) for each numbered line.)

Name of Candidate or Committee in full			
MICHAEL UDALL FOR PRESIDENT			
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
JANE MANET DETROIT, MI	ELECTION EXPENSE	5-14	100.00
MARK MILLAR 800 LAFAYETTE BLDG. DETROIT, MI	EXP. REIMB., PER SERV., TRAVEL ADV.	5-7 14 18	60.00 60.00 125.00
GARY MITCHELL 800 LAFAYETTE BLDG. DETROIT, MI	EXA REIMB., PER SERV., TRAVEL ADV.	5-3 7 13 14 19	69.29 50.00 32.37 50.00 345.11
CURT MOFFAT NATIONAL COMMITTEE WASHINGTON, D.C.	ADVANCE	5-12 14 15	40.00 46.53 75.00
GABRIEL MULLIAN GRAND RAPIDS, MI	RENT	5-14	300.00
JOHN NELSON ESCANABA, MI	PER. SERV. & EXA REIMB.	5-7 8 14 19	50.00 6.14 50.00 150.00
SUSAN NELSON 800 LAFAYETTE BLDG. DETROIT, MI	PER. SERV. & EXPENSE REIMB., TRAVEL ADV.	5-3 7 11 19	46.25 35.00 35.00 123.85
KAREN ORLANSKY 800 LAFAYETTE BLDG. DETROIT, MI	PER SERV., EXP REIMB., TRAVEL ADV.	5-3 6 7 13 19	45.62 80.00 75.00 60.00 144.28
Subtotal of expenditures this page (optional)			2381.24
Total this period (last page this line number only)			8

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UDALL FOR PRESIDENT
Office of the National Treasurer
122 East 42 Street, New York, N.Y. 10017 • (212) 388-2233 697-2233

December 3, 1979

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

Attn: Charles Steele
Acting General Counsel

Re: MUR 993

Dear Mr. Steele:

The Udall '76 Committee is responding to your letter of October 18, 1979, on behalf of the New York Udall '76 Committee.

Enclosed please find a Comprehensive Amendment for the year 1976 which itemizes contributions totaling \$3,754.00 which were previously omitted from the New York Committee's reports. Please note that the worksheet which the Audit Staff supplied to us was incorrectly totaled (a copy is enclosed). The Comprehensive Amendment also itemizes the receipt of the \$900.00 in-kind contribution.

If you should have any further questions, please contact Mr. Edward Coyle of Congressman Udall's staff, at (202)225-9790.

Sincerely,

STANLEY KURZ
National Treasurer

SK:ejd

cc: Honorable Morris K. Udall
Matthew Lawlor, Treasurer
New York Udall '76 Committee
James D. Pembroke, Esq.



**REPORT OF RECEIPTS AND EXPENDITURES
 FOR A CANDIDATE OR COMMITTEE
 SUPPORTING CANDIDATE(S) FOR
 NOMINATION OR ELECTION TO FEDERAL OFFICE**

(Except for Candidates or Committees Receiving Federal Matching Funds)

Notes: Committees authorized by a candidate to receive contributions and make expenditures in connection with more than one election must maintain separate records with respect to each election.

1 NEW YORK UDALL '76 COMMITTEE 2 I.D. No. _____ Candidate/Committee
 Name of Candidate or Committee (in full)
90 UDALL '76 COMMITTEE, 122 EAST 42 STREET PRESIDENCY
 Address (number and street) Office Sought, State/District (if applicable)
NEW YORK, NEW YORK 10017 City, State and ZIP Code Check if address is different than previously reported. Year of Election 1976


4 Type of Report (check appropriate boxes)
 April 10 Quarterly Report Tenth day report preceding _____ election (primary, general or convention) Termination Report
 July 10 Quarterly Report on _____ in the State of _____ Amendment for: 1976 (which report)
 October 10 Quarterly Report Thirtieth day report following _____ election (primary, general or convention)
 January 31 Annual Report Monthly Report _____ on _____ in the State of _____ (month) (date)
 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 <u>11/1/76</u> Through <u>12/31/76</u>	Column A This Period	Column B Calendar Year-To-Date
6 Cash on hand January 1, 19 <u>COMPREHENSIVE ADJUSTMENT - ADJUSTMENTS</u>		\$ 0
7 Cash on hand at beginning of reporting period (AS REPORTED 8/31/76)	\$ 0	
8 Total receipts (from line 19)	\$ 4,654.00	\$ 115,031.48
(a) Subtotal (Add lines 7 and 8 for Column A and lines 6 and 8 for Column B)	\$ 4,654.00	\$ 115,031.48
9 Total expenditures (from line 25)	\$ 900.00	\$ 111,277.48
10 Cash on hand at close of reporting period (Subtract line 9 from line 8a)	\$ 3,754.00	\$ 3,754.00
11 Value of contributed items on hand to be liquidated (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.
1/17/79 (Date) STANLEY KURTZ, NATIONAL TREASURER (Typed Name of Treasurer or Candidate) Stanley Kurtz (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 441j (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
 B-18762D (R0506)
 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.

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DETAILED SUMMARY OF RECEIPTS AND EXPENDITURES
(Page 2, FEC FORM 3)

NAME OF CANDIDATE OR COMMITTEE
NEW YORK UDALL '76 COMMITTEE

REPORT COVERING THE PERIOD
FROM: 11/1/76 TO: 12/31/76

RECEIPTS		Column A This Period	Column B Calendar Year-To-Date
COMPREHENSIVE AMENDMENT - ADJUSTMENTS			
14. Contributions from individuals (including contributions in-kind):			
(a) Itemized (use Schedule A)	\$ 4,654.00		
(b) Unitemized	\$ 0		
(c) Sales and collections included above: List by event on memo Schedule D (8) _____ 1			
(d) Subtotal of contributions from individuals	\$ 4,654.00	\$ 52,995.75	
15. Transfers from Political Committees:			
(a) Funds from affiliated/authorized committees (itemize on Schedule A regardless of amount)	\$ 0		
(b) Funds from other committees (itemize on Schedule A regardless of amount)	\$ 0		
(c) Contributions in-kind from political committees (itemize on Schedule A regardless of amount)	\$ 0		
(d) Subtotal of transfers in and contributions in-kind from political committees	\$ 0	\$ 61,719.21	
16. Other Income:			
(a) Itemized (use Schedule A)	\$ 0		
(b) Unitemized	\$ 0		
(c) Subtotal of other income	\$ 0	\$	
17. Loans and Loan Repayments Received:			
(a) Itemized (use Schedule A)	\$ 0		
(b) Unitemized	\$ 0		
(c) Subtotal of loans and loan repayments received	\$ 0	\$	
18. Refunds, Rebates, Returns of Deposits:			
(a) Itemized (use Schedule A)	\$ 0		
(b) Unitemized	\$ 0		
(c) Subtotal of refunds, rebates, returns of deposits	\$ 0	\$ 316.52	
19. Total Receipts	\$ 4,654.00	\$ 115,031.48	
EXPENDITURES			
Operating Expenditures:			
(a) Itemized (use Schedule B)	\$ 900.00		
(b) Unitemized	\$ 0		
(c) Subtotal of operating expenditures	\$ 900.00	\$ 100,355.20	
20. Loans, Loan Repayments, and Contribution Refunds Made:			
(a) Itemized (use Schedule B)	\$ 0		
(b) Unitemized	\$ 0		
(c) Subtotal of loans and loan repayments made and contribution refunds	\$ 0	\$	
21. Transfers Out to Political Committees:			
(a) To affiliated/authorized committees (itemize on Schedule B regardless of amount)	\$ 0		
(b) To other committees (itemize on Schedule B regardless of amount)	\$ 0		
(c) Contributions in-kind to other committees (itemize on Schedule B regardless of amount)	\$ 0		
(d) Subtotal of transfers out	\$ 0	\$ 2929.39	
22. Independent Expenditures (use Schedule E)	\$ 0	\$	
23. Coordinated Expenditures Made by Political Committees (2 U.S.C. 441e(d)) - (itemize on Schedule F) - FINANCIALS EXPENDITURES	\$ 0	\$ 7992.83	
24. Total Expenditures	\$ 900.00	\$ 111,277.48	
RECEIPTS AND EXPENDITURES, NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES			
26. Total Receipts (from line 19)	\$ 4,654.00		
27. Transfers In (from line 15(a))	\$ 0		
28. Net Receipts (Subtract line 27 from line 26)	\$ 4,654.00		
29. Total Expenditures (from line 25)	\$ 900.00		
30. Transfers Out (from line 22(a))	\$ 0		
31. Net Expenditures (Subtract line 30 from line 29)	\$ 900.00		

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 3

(Use Separate Schedules for
 each numbered line)

Name of Candidate or Committee in Full			
<u>NEW YORK UDALL '76 COMMITTEE - AMENDMENT</u>			
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
<u>EDITH KERR</u>	<u>ALTERNATIVE MONTHLY REPORT</u> <u>2/1/76 - 2/29/76 ADDITION</u> <u>PREVIOUSLY OBTAINED</u> Occupation	<u>2/14/76</u>	<u>200.00</u>
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
<u>ELAINE W. WINIK</u>	<u>ALTERNATIVE MONTHLY REPORT</u> <u>2/1/76 - 2/29/76 ADDITION</u> <u>PREVIOUSLY OBTAINED</u> Occupation	<u>2/16/76</u>	<u>250.00</u>
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
<u>SUZANNE BROSS</u> <u>57 EAST 79 STREET</u> <u>NEW YORK, N.Y.</u>	<u>ALTERNATIVE MONTHLY REPORT</u> <u>3/1/76 - 3/31/76 ADDITION</u> <u>PREVIOUSLY OBTAINED</u> Occupation	<u>3/19/76</u>	<u>250.00</u>
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
<u>DAVID H THORNE</u>	<u>ALTERNATIVE MONTHLY REPORT</u> <u>3/1/76 - 3/31/76 ADDITION</u> <u>PREVIOUSLY OBTAINED</u> Occupation	<u>3/19/76</u>	<u>250.00</u>
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
<u>FRED SCHEINER</u> <u>PLEASANTVILLE, NEW YORK</u>	<u>ALTERNATIVE MONTHLY REPORT</u> <u>3/1/76 - 3/31/76 ADDITION</u> <u>PREVIOUSLY OBTAINED</u> Occupation	<u>3/29/76</u>	<u>250.00</u>
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
<u>ROSAIND SCHEINER</u> <u>PLEASANTVILLE, NEW YORK</u>	<u>ALTERNATIVE MONTHLY REPORT</u> <u>3/1/76 - 3/31/76 ADDITION</u> <u>PREVIOUSLY OBTAINED</u> Occupation	<u>3/29/76</u>	<u>500.00</u>
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
<u>SAUL UYMAN</u> <u>28 WEST 23 STREET</u> <u>NEW YORK, NEW YORK</u>	<u>ALTERNATIVE MONTHLY REPORT</u> <u>3/1/76 - 3/31/76 ADDITION</u> <u>PREVIOUSLY OBTAINED</u> Occupation	<u>3/24/76</u>	<u>250.00</u>
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$		
SUBTOTAL of receipts this page (optional)			\$ <u>2,400.00</u>
TOTAL this period (last page this line number only)			\$

82040323649

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

(Use Separate Schedules for
 each numbered line)

32040323550

Name of Candidate or Committee in Full			
<u>NEW YORK WALL '76 COMMITTEE - AMENDMENT</u>			
Full Name, Mailing Address and ZIP Code <u>SAUL V. TOROFF</u>	Principal Place of Business <u>ALTERNATIVE MONTHLY REPORT</u> <u>3/1/76 - 3/31/76 ADDITION</u> <u>PREVIOUSLY OMITTED</u> Occupation	Date (month, day, year) <u>3/28/76</u>	Amount of each Receipt this Period <u>15.00</u>
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$		
Full Name, Mailing Address and ZIP Code <u>FRANCIS BLEHM</u>	Principal Place of Business <u>ALTERNATIVE MONTHLY REPORT</u> <u>3/1/76 - 3/31/76 ADDITION</u> <u>PREVIOUSLY OMITTED</u> Occupation	Date (month, day, year) <u>3/27/76</u>	Amount of each Receipt this Period <u>50.00</u>
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$		
Full Name, Mailing Address and ZIP Code <u>MARVIN ROSENBERG</u>	Principal Place of Business <u>ALTERNATIVE MONTHLY REPORT</u> <u>3/1/76 - 3/31/76 ADDITION</u> <u>PREVIOUSLY OMITTED</u> Occupation	Date (month, day, year) <u>3/29/76</u>	Amount of each Receipt this Period <u>100.00</u>
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$		
Full Name, Mailing Address and ZIP Code <u>REV. JOHN H. HATT</u> <u>ENIZABETHOWN, NEW YORK</u>	Principal Place of Business <u>ALTERNATIVE MONTHLY REPORT</u> <u>3/1/76 - 3/31/76 ADDITION</u> <u>PREVIOUSLY OMITTED</u> Occupation	Date (month, day, year) <u>3/20/76</u>	Amount of each Receipt this Period <u>100.00</u>
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$		
Full Name, Mailing Address and ZIP Code <u>KENNETH A. MILLS</u> <u>275 PARK AVENUE</u> <u>NEW YORK, NEW YORK</u>	Principal Place of Business <u>ALTERNATIVE MONTHLY REPORT</u> <u>3/1/76 - 3/31/76 ADDITION</u> <u>PREVIOUSLY OMITTED</u> Occupation	Date (month, day, year) <u>3/15/76</u>	Amount of each Receipt this Period <u>100.00</u>
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$		
Full Name, Mailing Address and ZIP Code <u>ARMANDO CARTO</u>	Principal Place of Business <u>ALTERNATIVE MONTHLY REPORT</u> <u>4/1/76 - 4/30/76 ADDITION</u> <u>PREVIOUSLY OMITTED</u> Occupation	Date (month, day, year) <u>4/5/76</u>	Amount of each Receipt this Period <u>250.00</u>
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$		
Full Name, Mailing Address and ZIP Code <u>MARTIN L. MILLMAN</u> <u>GREAT NECK, NEW YORK</u>	Principal Place of Business <u>ALTERNATIVE MONTHLY REPORT</u> <u>4/1/76 - 4/30/76 ADDITION</u> <u>PREVIOUSLY OMITTED</u> Occupation	Date (month, day, year) <u>4/3/76</u>	Amount of each Receipt this Period <u>100.00</u>
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$		
SUBTOTAL of receipts this page (optional)			\$ <u>715.00</u>
TOTAL this period (last page: this line number only)			\$

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

(Use Separate Schedules for
 each numbered line)

Name of Candidate or Committee in Full

NEW YORK UDALL '76 COMMITTEE - AMENDMENT

Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
FRANCIS BOEHM	ALTERNATIVE MONTHLY REPORT 4/1/76 - 4/30/76 ADDITION PREVIOUSLY OMITTED Occupation	4/12/76	100.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed			
Aggregate Year-To-Date . . . \$			
KENNETH A. MILLS	ALTERNATIVE MONTHLY REPORT 4/1/76 - 4/30/76 ADDITION PREVIOUSLY OMITTED Occupation	4/14/76	75.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed			
Aggregate Year-To-Date . . . \$			
GILBERT MATTHEWS 55 WATER STREET NEW YORK, NEW YORK	ALTERNATIVE MONTHLY REPORT 4/1/76 - 4/30/76 ADDITION PREVIOUSLY OMITTED Occupation	4/19/76	53.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed			
Aggregate Year-To-Date . . . \$			
PETER STEIN 46 MASSITOA ROAD YONKERS, NEW YORK	ALTERNATIVE MONTHLY REPORT 4/1/76 - 4/30/76 ADDITION PREVIOUSLY OMITTED Occupation	4/15/76	20.00 6.00 30.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed			
Aggregate Year-To-Date . . . \$			
CHARLES GAMPER	ALTERNATIVE MONTHLY REPORT 5/1/76 - 5/31/76 ADDITION PREVIOUSLY OMITTED Occupation	5/24/76	100.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed			
Aggregate Year-To-Date . . . \$			
FELICE EUG. DAIKOU	ALTERNATIVE MONTHLY REPORT 5/1/76 - 5/31/76 ADDITION PREVIOUSLY OMITTED Occupation	5/23/76	55.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed			
Aggregate Year-To-Date . . . \$			
NORRIS HAITTERMAN 1558 FULTON STREET BROOKLYN, NEW YORK	ALTERNATIVE MONTHLY REPORT 5/1/76 - 5/31/76 ADDITION PREVIOUSLY OMITTED Occupation	5/15/76	100.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed			
Aggregate Year-To-Date . . . \$			
SUBTOTAL of receipts this page (optional)			\$ 539.00
TOTAL this period (last page this line number only)			\$

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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

(Use Separate Schedules for
 each numbered line)

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Name of Candidate or Committee in Full			
NEW YORK WALL '76 COMMITTEE		AMENDMENT	
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
FRANCIS BOEHM	ALTERNATIVE MONTHLY REPORT 6/1/76 - 6/30/76 ADDITION PREVIOUSLY OMITTED	6/1/76	50.00
Receipt for:	<input type="checkbox"/> Check if Contributor is self-employed		
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Aggregate Year-To-Date . . . \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
GILBERT E. MATTHEWS 40 BEAR & STEARNS CO. 55 WATER STREET NEW YORK, N.Y. CONTRIBUTION IN-KIND	ALTERNATIVE MONTHLY REPORT 3/1/76 - 3/31/76 ADDITION PREVIOUSLY OMITTED	3/18/76	900.00 (IN-KIND IN FORM OF TELEPHONE DEP.
Receipt for:	<input type="checkbox"/> Check if Contributor is self-employed		
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Aggregate Year-To-Date . . . \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Receipt for:	<input type="checkbox"/> Check if Contributor is self-employed		
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Aggregate Year-To-Date . . . \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Receipt for:	<input type="checkbox"/> Check if Contributor is self-employed		
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Aggregate Year-To-Date . . . \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Receipt for:	<input type="checkbox"/> Check if Contributor is self-employed		
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Aggregate Year-To-Date . . . \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Receipt for:	<input type="checkbox"/> Check if Contributor is self-employed		
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Aggregate Year-To-Date . . . \$		
SUBTOTAL of receipts this page (optional)			\$ 950.00
TOTAL this period (last page this line number only)			\$ 4,654.00

ITEMIZED EXPENDITURES
 (Operating, Transfers Out, Contributions In-Kind,
 Loans, Loan Repayments and Refunds Made)
 Supporting Lines 20a, 21a, and 22a, 22b, and 22c
 of FEC FORM 3

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Name of Candidate or Committee in Full <i>NEW YORK LOCAL '76 COMMITTEE</i>			
		<i>AMENDMENT</i>	
Full Name, Mailing Address and ZIP Code <i>GILBERT E. MATHEWS 40 BEAR & STEARNS CO. 55 WATER STREET NEW YORK, N.Y. CONTRIBUTION IN-KIND</i>	Particulars of Expenditure <i>INTERIM MONTHLY REPORT 3/1/76 - 3/31/76 ADDITION PREVIOUSLY OMITED</i>	Date (month, day, year) <i>3/18/76</i>	Amount of each expendi- ture this period <i>900.00</i>
	Expenditure for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expendi- ture this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expendi- ture this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expendi- ture this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expendi- ture this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expendi- ture this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expendi- ture this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
SUBTOTAL of expenditures this page (optional).....			\$ <i>900.00</i>
TOTAL this period (last page this line number only).....			\$ <i>900.00</i>

New York Office '76 Committee
Contributions Required To Be Forwarded

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Contributor	Date	Amount			
Suzanne Cross	3/19/76	250 ⁰⁰			
David H. Thorne	3/19/76	250 ⁰⁰	250.00	00	
Fred Scheiner	3/19/76	250 ⁰⁰	250.00	00	
Rosalind Scheiner	3/19/76	500 ⁰⁰	500.00	00	
Fred Scheiner	3/29/76	500 ⁰⁰	500.00	00	
Saul Olyman	3/29/76	250 ⁰⁰	250.00	00	
Amant Bastes	4/1/76	250 ⁰⁰	200.00	00	
Evelyn Kerr	2/14/76	200 ⁰⁰	250.00	00	
Blaine W. Winick	2/14/76	250 ⁰⁰	150.00	00	
Saul V. Moroff	3/25/76	15 ⁰⁰	100.00	00	
Martin L. Shillman	4/5/76	100 ⁰⁰	50.00	00	
Francis Kochan	4/12/76	100 ⁰⁰	50.00	00	
" "	6/1/76	50 ⁰⁰	100.00	00	
" "	3/10/76	50 ⁰⁰	55.00	00	
Charles Langer	5/24/76	100 ⁰⁰	100.00	00	
Marvin Rosenberg	3/29/76	100 ⁰⁰	75.00	00	
Felice Eve Darkow	5/28/76	55 ⁰⁰	100.00	00	
Rev. John H. Idatt	3/30/76	100 ⁰⁰	53.00	00	
Kenneth A. Mills	3/15/76	100 ⁰⁰	6.00	00	
" "	4/14/76	75 ⁰⁰	30.00	00	
Morris Harmanman	5/5/76	100 ⁰⁰	20.00	00	
Silbert Matthews	4/9/76	55 ⁰⁰			
Peter Stein	4/15/76	6 ⁰⁰			
" "	"	30 ⁰⁰			
" "	"	20 ⁰⁰			
25 @ \$3,504			3,754.00	00	T



December 3, 1979

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

Attn: Charles Steele
Acting General Counsel

Re: MUR 993

Dear Mr. Steele:

The Udall '76 Committee ("the National Committee") is responding to your letter of October 18, 1979, on behalf of the Washington Citizens for Udall '76 Committee.

The Audit staff was unable to verify and check for accuracy the reported receipts and expenditures for the period from December 1, 1975 through February 29, 1976 due to incomplete records presented at the time of the audit. This matter was brought to our attention and the National Committee immediately wrote the Washington Treasurer requesting those missing items. A copy of our letter is enclosed herewith. Despite subsequent and repeated verbal requests by the National Committee, we have been unable to obtain those records. However, we feel that we have demonstrated our best efforts in this matter.

Also enclosed is a Comprehensive Amendment for the year 1976 which itemizes 31 expenditures totaling \$5,685.11 that were previously omitted from Committee reports.

Supporting documentation for expenditures which were found to be inadequately documented has been submitted under separate cover.

The Washington Committee's termination report dated July 10, 1976, disclosed outstanding debts totaling \$3,099.32. The National Committee has found the following:

1) Two (2) outstanding debts were assumed and paid by the National Committee. They are:

Richard Kelly	9/1/76	\$1,384.16
IRS	9/7/77	\$ 462.60

The National Committee reported the payment made to Richard Kelly in our October 10th Quarterly Report for 1976. The National Committee reported the payment made to the IRS in our October 10th Quarterly Report for 1977.



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Page 2
Federal Election Commission
December 3, 1979

2) The Washington Committee, in its April 10, 1976 report, disclosed an outstanding debt of \$1,274.60 owed to the North Seattle Printing Company. The following payments were made to North Seattle Printing by the Washington Committee (please note that these expenditures were omitted from the Washington Committee's reports and have subsequently been included in the Comprehensive Amendment for the year 1976):

4/4/76	\$500.00
4/16/76	200.00
5/14/76	200.00
5/25/76	150.00

The Washington Committee, in its termination report of July 10, 1976, disclosed a final outstanding debt of \$733.71 owed to North Seattle Printing. The National Committee assumed this debt and paid \$550.00 to North Seattle Printing on December 14, 1976. The outstanding debt of \$733.71 was settled for approximately 25% less ($733.71 - 183.71$ or $25\% = 550.00$). The payment made by the National Committee was reported in our January 31 Year End Report for 1976.

3) The following is a list of outstanding debts that the Washington Committee reported and for which no subsequent payments have been found:

The Franklin Press	\$ 90.00
Martin Smith Mgmt.	\$140.00
Wash. State Dem. Comm.	\$ 75.00
Sherry Thompson	\$106.08
Gary Stein	\$ 6.19
Sharon Wylie	\$100.00
Bob Swanson	\$ 49.89

As to the final disposition of these debts, enclosed please find copies of contemporaneous memorandum which shows that the National Committee did try to fulfill its obligations or have the Washington Committee do so. Unfortunately, except for the



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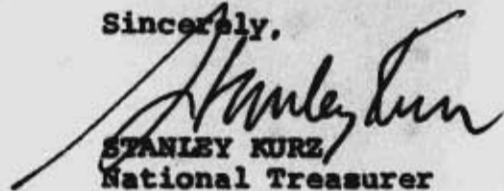
UDALL FOR PRESIDENT
Office of the National Treasurer
122 East 42 Street, New York, N.Y. 10017 • (212) 682-7670

Page 3
Federal Election Commission
December 3, 1979

payments noted above, we can find no records showing the final outcome of this correspondence.

If you should have any further questions, please contact Mr. Edward Coyle of Congressman Udall's staff, at (202)225-9790.

Sincerely,


STANLEY KURZ
National Treasurer

SK:ejd

cc: Honorable Morris K. Udall
Richard Kelly, Washington State
Coordinator
James D. Pembroke, Esq.

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**REPORT OF RECEIPTS AND EXPENDITURES
 FOR A CANDIDATE OR COMMITTEE
 SUPPORTING CANDIDATE(S) FOR
 NOMINATION OR ELECTION TO FEDERAL OFFICE**

(Except for Candidates or Committees Receiving Federal Matching Funds)

Notes: Committees authorized by a candidate to receive contributions and make expenditures in connection with more than one election must maintain separate records with respect to each election.

1 WASHINGTON CITIZENS FOR UDALL '76 COMM. I.D. No. _____ Candidate/Committee
 Name of Candidate or Committee (in full)
76 UDALL '76 COMMITTEE, 1328 42 STREET APRESIDENCY
 Address (number and street) Office Sought, State/District (if applicable)
NEW YORK, NEW YORK 10017 _____
 City, State and ZIP Code (Check if address is different than previously reported.) Year of Election 1976

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 _____ (month) on _____ (date) in the State of _____
 - Tenth day report preceding _____ election (primary, general or convention) on _____ (date) in the State of _____
 - Thirtieth day report following _____ election (primary, general or convention) on _____ (date) in the State of _____
 - Termination Report
 - Amendment for: 1976 (which report)
- 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.)

	Column A This Period	Column B Calendar Year-To-Date
5 Covering Period <u>11/1/76</u> Through <u>12/31/76</u>		
6 Cash on hand January 1, 19 <u>COMPREHENSIVE AMENDMENT-ADJUSTMENTS</u>		\$ 0
7 Cash on hand at beginning of reporting period <u>(AS REPORTED 6/30/76)</u>	\$ 0	
8 Total receipts (from line 19)	\$ 0	\$ 13045.78
(a) Subtotal (Add lines 7 and 8 for Column A and lines 6 and 8 for Column B)	\$ 0	\$ 13045.78
9 Total expenditures (from line 25)	\$ 5685.11	\$ 18691.69
10 Cash on hand at close of reporting period (Subtract line 9 from line 8a)	\$ (5685.11)	\$ (5645.91)
11 Value of contributed items on hand to be liquidated (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.
12/29 (Date) STANLEY KURZ, NATIONAL TREASURER (Typed Name of Treasurer or Candidate) Stanley Kurz (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 441j (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
 B-187620 (R0506)
 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.

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DETAILED SUMMARY OF RECEIPTS AND EXPENDITURES
(Page 2, FEC FORM 3)

NAME OF CANDIDATE OR COMMITTEE		REPORT COVERING THE PERIOD	
WASHINGTON CITIZENS FOR WALL '76 COMMITTEE		FROM: 1/1/76	TO: 12/31/76
RECEIPTS		Column A This Period	Column B Calendar Year-To-Date
COMPREHENSIVE AMENDMENT - ADJUSTMENTS			
14. Contributions from individuals (including contributions in-kind):			
(a) Itemized (see Schedule A)		\$ 0	
(b) Unitemized		\$ 0	
(c) Sales and collections included above: List by event on memo Schedule D (S _____)			
(d) Subtotal of contributions from individuals		\$ 0	\$ 5081.78
15. Transfers from Political Committees:			
(a) Funds from affiliated/authorized committee (itemize on Schedule A regardless of amount)		\$ 0	
(b) Funds from other committees (itemize on Schedule A regardless of amount)		\$ 0	
(c) Contributions in-kind from political committees (itemize on Schedule A regardless of amount)		\$ 0	
(d) Subtotal of transfers in and contributions in-kind from political committees		\$ 0	\$ 7964.00
16. Other Income:			
(a) Itemized (see Schedule A)		\$ 0	
(b) Unitemized		\$ 0	
(c) Subtotal of other income		\$ 0	\$
17. Loans and Loan Repayments Received:			
(a) Itemized (see Schedule A)		\$ 0	
(b) Unitemized		\$ 0	
(c) Subtotal of loans and loan repayments received		\$ 0	\$ 0
Refunds, Rebates, Returns of Deposits:			
(a) Itemized (see Schedule A)		\$ 0	
(b) Unitemized		\$ 0	
(c) Subtotal of refunds, rebates, returns of deposits		\$ 0	\$ 0
18. Total Receipts		\$ 0	\$ 13045.78
EXPENDITURES			
Operating Expenditures:			
(a) Itemized (see Schedule B)		\$ 5685.11	
(b) Unitemized		\$ 0	
(c) Subtotal of operating expenditures		\$ 5685.11	\$ 8044.63
Loans, Loan Repayments, and Contribution Refunds Made:			
(a) Itemized (see Schedule B)		\$ 0	
(b) Unitemized		\$ 0	
(c) Subtotal of loans and loan repayments made and contribution refunds		\$ 0	\$ 1000.00
Transfers Out to Political Committees:			
(a) To affiliated/authorized committee (itemize on Schedule B regardless of amount)		\$ 0	
(b) To other committees (itemize on Schedule B regardless of amount)		\$ 0	
(c) Contributions in-kind to other committees (itemize on Schedule B regardless of amount)		\$ 0	
(d) Subtotal of transfers out		\$ 0	\$ 53.67
23. Independent Expenditures (see Schedule E)		\$ 0	\$
24. Coordinated Expenditures Made by Political Committees (2 U.S.C. 441e(d)) (itemize on Schedule F) <i>FUNDRAISING EXPENDITURES</i>		\$ 0	\$ 9593.39
25. Total Expenditures		\$ 5685.11	\$ 18691.69
RECEIPTS AND EXPENDITURES, NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES			
26. Total Receipts (from line 18)		\$ 0	
27. Transfers In (from line 15(a))		\$ 0	
28. Net Receipts (Subtract line 27 from line 26)		\$ 0	
29. Total Expenditures (from line 25)		\$ 5685.11	
30. Transfers Out (from line 22(a))		\$ 0	
31. Net Expenditures (Subtract line 30 from line 29)		\$ 5685.11	

ITEMIZED EXPENDITURES
 (Operating, Transfers Out, Contributions In-Kind,
 Loans, Loan Repayments and Refunds Made)
 Supporting Lines 20a, 21a, and 22a, 22b, and 22c
 of FEC FORM 3

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Name of Candidate or Committee in Full WASHINGTON CITIZENS FOR WALL '76 COMMITTEE <u>AMENDMENT</u>			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
DICK KELLY 2524 COYER E. SEATTLE, WASH. 98102	ALTERNATIVE MONTHLY REPORT 2/1/76 - 2/29/76 ADDITION PREVIOUSLY OMITTED Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	2/27/76	300.00
DICK KELLY	ALTERNATIVE MONTHLY REPORT 3/1/76 - 3/31/76 ADDITION PREVIOUSLY OMITTED Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	3/31/76	32.56
DICK KELLY	ALTERNATIVE MONTHLY REPORT 4/1/76 - 4/30/76 ADDITION PREVIOUSLY OMITTED Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	4/9/76 4/15/76 4/16/76	35.98 40.23 9.40
DICK KELLY	SAME AS ABOVE ADDITION PREVIOUSLY OMITTED Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	4/16/76 4/28/76	100.00 100.00
DICK KELLY	ALTERNATIVE MONTHLY REPORT 5/1/76 - 5/31/76 ADDITION PREVIOUSLY OMITTED Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	5/11/76 5/6/76	150.00 50.00
DICK KELLY	SAME AS ABOVE ADDITION PREVIOUSLY OMITTED Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	5/14/76 5/25/76	50.00 250.00
DICK KELLY	SAME AS ABOVE ADDITION PREVIOUSLY OMITTED Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	5/25/76 5/25/76	25.00 15.00
DICK KELLY	ALTERNATIVE MONTHLY REPORT 6/1/76 - 6/30/76 ADDITION PREVIOUSLY OMITTED Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	6/10/76	50.00
SUBTOTAL of expenditures this page (optional).....			\$ 1208.17
TOTAL this period (last page this line number only).....			\$

ITEMIZED EXPENDITURES

(Operating, Transfers Out, Contributions in-Kind,
Loans, Loan Repayments and Refunds Made)
Supporting Lines 20a, 21a, and 22a, 22b, and 22c
of FEC FORM 3

Page 2 of 3 for
Line Number 20a

(Use Separate Schedules for
each numbered line)

Name of Candidate or Committee in Full WASHINGTON CITIZENS FOR WAJAL '76 COMMITTEE <u>AMENDMENT</u>			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
MARTIN SMITH MGMT. DEXTER HORTON BLDG. SEATTLE, WASH. 98104	ALTERNATIVE MONTHLY REPORT <u>2/1/76 - 2/29/76 ADDITION</u> PREVIOUSLY OMITTED	2/27/76	140.00
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
PACIFIC N.W. BELL SEATTLE, WASH.	ALTERNATIVE MONTHLY REPORT <u>3/1/76 - 3/31/76 ADDITION</u> PREVIOUSLY OMITTED	3/30/76	320.71
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
LORM NELSON CONST. 19311 45TH, N.E. SEATTLE, WASH. 98155	ALTERNATIVE MONTHLY REPORT <u>4/1/76 - 4/30/76 ADDITION</u> PREVIOUSLY OMITTED	4/2/76	500.00
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	4/8/76	500.00
NORTH SEATTLE PRINTING 5514 UNIVERSITY WAY, NE SEATTLE, WASH. 98105	ALTERNATIVE MONTHLY REPORT <u>ADDITION</u> PREVIOUSLY OMITTED	4/4/76	500.00
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	4/16/76	200.00
MARTIN SMITH MGMT. DEXTER HORTON BLDG. SEATTLE, WASH. 98104	ALTERNATIVE MONTHLY REPORT <u>ADDITION</u> PREVIOUSLY OMITTED	4/13/76	140.00
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
KZAM	ALTERNATIVE MONTHLY REPORT <u>ADDITION</u> PREVIOUSLY OMITTED	4/16/76	280.00
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
PACIFIC N.W. BELL SEATTLE, WASH.	ALTERNATIVE MONTHLY REPORT <u>ADDITION</u> PREVIOUSLY OMITTED	4/29/76	209.15
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
INTERNAL REVENUE SERVICE OSDEN, UTAH	ALTERNATIVE MONTHLY REPORT <u>ADDITION</u> PREVIOUSLY OMITTED	4/29/76	323.50
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	4/29/76	339.30
SUBTOTAL of expenditures this page (optional)			\$ 3452.66
TOTAL this period (last page this line number only)			\$

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ITEMIZED EXPENDITURES
 (Operating, Transfers Out, Contributions in-Kind,
 Loans, Loan Repayments and Refunds Made)
 Supporting Lines 20a, 21a, and 22a, 22b, and 22c
 of FEC FORM 3

82040323662

Name of Candidate or Committee in Full			
WASHINGTON CITIZENS FOR UDALL '76 COMMITTEE <u>AMENDMENT</u>			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
PACIFIC N.W. BELL SEATTLE, WASH.	ALTERNATIVE MONTHLY REPORT 5/1/76 - 5/31/76 ADDITION	5/4/76 5/25/76	120.00 248.28
	PREVIOUSLY OMITTED Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
NORTH SEATTLE PRINTING 5514 UNIVERSITY WAY, NE SEATTLE, WASH. 98105	SAME AS ABOVE ADDITION	5/14/76 5/25/76	200.00 150.00
	PREVIOUSLY OMITTED Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
THE FRANKLIN PRESS 524 15TH STREET, E. SEATTLE, WASH. 98112	SAME AS ABOVE ADDITION	5/25/76	176.00
	PREVIOUSLY OMITTED Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
THE FRANKLIN PRESS 524 15TH STREET, E. SEATTLE, WASH. 98112	ALTERNATIVE MONTHLY REPORT 6/1/76 - 6/30/76 ADDITION	7/1/76	130.00
	PREVIOUSLY OMITTED Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
SUBTOTAL of expenditures this page (optional)			\$ 1024.28
TOTAL this period (last page this line number only)			\$ 5685.11



UDALL FOR PRESIDENT
Office of the National Treasurer
122 East 42 Street, New York, N. Y. 10017 • (212) 683-7670

September 19, 1977

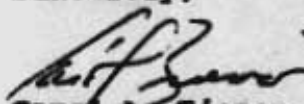
Ms. Susan Owen
Federal Election Commission
1325 K Street, N W
Washington, D. C. 20463

Dear Susan:

As per our telephone conversation this morning, please make note that we will show as many of the items noted on your August 15 letter as we can verify to be outstanding and or paid on our October 10 quarterly report. In those cases necessary, I will contact the state treasurers to determine the status of the accounts.

I trust that all is in order. Thank you for bringing this matter to our attention.

Sincerely,


Carol A. Ziener
Udall '76 Committee

/cz

82040323663



UDALL FOR PRESIDENT
Office of the National Treasurer
122 East 42 Street, New York, N.Y. 10017 • (212) 683-7670

M.F. Ludowese
P.O. Box 581
Wooster, Ohio 44691

August 19, 1976

Dear Buck,

The Washington office recently sent up to us the items which you sent to Ed Coyle. We also have in hand the report of receipts and expenditures primarily for the month of June (reports should cover a single month only). In view of the overdraft situation at Central Bank, and possibly at First State Bank, I believe it would be advisable to amend your June report to reflect expenditures only for those items which actually cleared for payment.

For those items which did not clear, and are therefore debts outstanding, we would like to have you reflect them as debts on a schedule C. We will also need a termination report for the month of July indicating that there are no longer funds on hand and that operations are closed down.

In reviewing the receipt side of the second page of the June report, I note that you have claimed \$48,000 for funds transferred in from the National Committee. Your May report claimed \$11,700. In transfers. Our records, which we have reported to the FEC, indicate that we transferred \$14,500 in May and \$35,000 in June to the Ohio Committee. Since there is a substantial difference between what we show, there is a possibility that the FEC may inquire as to what the transfers actually were.

We had a call from the FEC last week indicating their desire to set up a date for an audit of the Campaign books and records for the National committee toward the end of September. Since they may want to go over the reports of the state committees, with us as well, we would like to have these matters cleared up by then.

Sincerely,

Gordon C. Squire
Gordon C. Squire

Assistant National Treasurer

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could you also send us a copy of the Central Bank National Bank statement for June for documentation in support of matching funds

September 16, 1976

Udall For President
122 East 42 Street
New York, New York 10017

Dear Gordon:

Attached are many things:

1. A corrected 7/31 report. Note that everything I have shows \$59,500 received from National. Your letter shows \$49,500. Please re-check. Al did some strange things, but the Columbus operation did an excellent job on local contributions and could not be off by \$10,000.
2. A final zero balance report.
3. A check for \$113.32 to close the Columbus Account.
4. Numerous bills etc., unpaid; have written these people that you are now responsible.

No way can I show debts outstanding here; I do not know which bad checks you have paid .

Wish we had won; no question but that we backed the best man.

Sincerely,

M. F. (Buck) Ludowese
P. O. Box 581
Wooster, Ohio 44691

82040323665

Itemized Expenditures
Campaign Fundraising, Loans, and Transfers
for Lines 20, 21, 22, and/or 23 of FEC Form 3
(See Instructions on back)

Name of Candidate or Committee in full			
Udu 11 '76 Committee - Ohio			
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Gestetner Corp. 1728 St. Clair Cleveland, Ohio 44114	Paper & Stamps	5/25/76 6/12/76 6/2/76	168.87 338.13 326.64
		6/7/76 6/4/76	131.98 1,286.36
Peck's Cottages West Lake Rd. Vermilion, Ohio 44089	Lodging	5/28/76	112.32
Cleveland Plaza Euclid & E. 12th Cleveland, Ohio	Lodgings	5/28 5/29	162.00 643.34
Western Reserve Telephone Co. 4908 Main Ave. Akron, Ohio	Phone	5/28	100.00
Virgilia Lanning 16th Street, Ohio	Office Rent.	5/29/76	100.00
Waltz Business Equipment Cincinnati, Ohio	Imaging Systems	5/29/76	100.00
Agency Rent-A-Car 5651 Pearl Cleveland, Ohio	Auto Rental	5/29	200.00
Subtotal of expenditures this page (optional)			\$ 3,709.64
Total this period (last page this line number only)			\$

02040323666

Unrecorded Expenditures
Campaign Fundraising, Loans, and Transfers
for Lines 20, 21, 22, and/or 23 of FEC Form 3
 (see instructions on back)

Name of Candidate or Committee in full			
<i>Diadi 76 Committee - Ohio</i>			
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
<i>Betty Anne Youngstrom 5 San Angelo St. Springfield, Mass. 01107</i>	<i>Reimburse misc. expenses</i>	<i>5/29/76</i>	<i>117.53</i>
<i>Columbus Paper & Copy Supply 28 West Fifth Avenue Columbus, Ohio</i>	<i>Office Supplies</i>	<i>5/30/76</i>	<i>110.00</i>
<i>Cleveland Heights Postmaster Cleveland Heights, Ohio</i>	<i>Postage Stamps</i>	<i>5/30/76</i>	<i>130.00</i>
<i>Merchant Motors 3161 Euclid Cleveland, Ohio</i>	<i>Rental</i>	<i>5/30/76</i>	<i>300.00</i>
<i>United Clerken Cleveland Hopkins Airport Cleveland, Ohio</i>	<i>Fees</i>	<i>5/31/76</i>	<i>196.00</i>
<i>Dr. Mackay 755 Linn Ave. Cleveland, Ohio</i>	<i>Consulting Fee</i>	<i>5/31/76</i>	<i>1,600.00</i>
<i>Kingdom Bros Lanes 1465 Chester Cleveland, Ohio</i>	<i>Phone Buss.</i>	<i>6/1/76</i>	<i>112.00</i>
	<i>" "</i>	<i>6/2/76</i>	<i>112.00</i>
	<i>" "</i>	<i>6/2/76</i>	<i>112.00</i>
	<i>" "</i>	<i>6/7/76</i>	<i>112.00</i>
	<i>" "</i>	<i>6/7/76</i>	<i>112.00</i>
	<i>" "</i>	<i>6/7/76</i>	<i>112.00</i>
	<i>" "</i>	<i>6/7/76</i>	<i>112.00</i>
Subtotal of expenditures this page (optional)			<i>\$ 4,171.03</i>
Total this period (last page this line number only)			<i>\$</i>



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20543

September 13, 1977

Stanley Kurz, Treasurer
Udall '76 Committee
122 East 42 Street
New York, New York 10017

Dear Mr. Kurz:

On August 15, 1977, you were notified that your file of Reports of Receipts and Expenditures filed by your committee omitted certain required information.

As of this date, however, we have received no response from you. Your failure to amend your reports gives the Commission reason to believe that you are in violation of 2 U.S.C. 434.

The Commission will take no action against you until you have had a reasonable opportunity to respond to this letter. This response should be mailed to the Commission within ten (10) days of receipt of this letter.

If you have responded to the above or you require additional information, please contact Susan Owen, our Reports Analyst assigned to you on our toll free number (800)424-9530. Our local number is 523-4048.

Sincerely,

Thomas E. Hand

Commissioner

Certified Mail:
Return Receipt Requested



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FEDERAL ELECTION COMMISSION

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

August 15, 1977

Udall '76 Committee
Stanley Kurs, Treasurer
122 East 42 Street
New York, New York 10017

Re: Udall '76 California Comm.
Washington Citizens for
Udall '76
Arizona - Udall '76 Comm.
Iowa Udall '76 Comm.
Michigan Udall for President
New Hampshire Udall '76 Comm.
New Mexico Udall '76 Comm.

Dear Mr. Kurs:

This letter is prompted by our interest in assisting candidates and committees who wish to comply with the Federal Election Campaign Act, as amended.

During review of the your file of
Report of Receipts and Expenditures, we noticed that you omitted information or made apparent mathematical errors in certain entries. Attached is an itemization of the information requested.

While we recognize the difficulties you may have experienced in filling out the reporting forms, we must ask that you supply the Commission with the missing information within (10) days of receipt of this letter. If you have any questions, please do not hesitate to contact Susan Owen (202-523-4049) our Reports Analyst assigned to you.

Sincerely,

Orlando B. Potter

Orlando B. Potter
Staff Director

Attachment

12

82040323669



TO: Udall '76 Committee DATE: _____

I.D. NO.: C00030148

**REQUEST FOR ADDITIONAL INFORMATION FOR THE All REPORT OF RECEIPTS
AND EXPENDITURES COVERING THE PERIOD 5/1/76 THROUGH 12/31/76
PURSUANT TO THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED.**

A review of the report indicates that additional information is needed in order to be considered complete. Please return a copy of this form with your amended submission(s).

Please provide the required data, as indicated (x):

Coverage Dates omitted or incorrect

Signature omitted or incorrect

Summary Page Line(s) Column(s) Totals omitted or incorrect

Detailed Summary (Page 2) Line(s) Column(s) Totals omitted or incorrect

Schedule Totals disagree with Detailed Summary (Page 2) or omitted

Date(s) omitted or inadequate for Schedule(s) Line(s)

Full Name(s) Omitted for Schedule(s) Line(s)

Mailing Address(es) omitted or inadequate for Schedule(s) Line(s)

Occupational Descriptions omitted or inadequate for Schedule(s) Line(s)

Principal Place(s) of Business omitted or inadequate for Schedule(s) Line(s)

Aggregate Year-to-date Totals omitted or inadequate for Schedule(s) Line(s)

Nature or Purpose of Expenditure omitted or inadequate for Schedule(s) Line(s)

Nature or Purpose of Receipt omitted or inadequate for Schedule(s) Line(s)

Inadequate Description of proceeds dates events location of Schedule

Other: See Page two.

Your initial submission(s), together with this request for additional information, has been made available for public inspection. The Commission urges you to file the additional submission(s) promptly to the above address. If you have any questions regarding this request, please call the Disclosure Division toll free at (800) 424-9530. The local Washington, D.C. telephone number is (202) 523-4048.

Senate filers should file their submission(s) with the Secretary of the Senate, Office of Public Records, 119 D St., N.E., Washington, D.C. 20510. House filers should file their submission(s) with the Clerk of the House, Office of Records and Registration, 1036 Longworth House Office Building, Washington, D.C. 20515.

REQUEST FOR ADDITIONAL INFORMATION

Page two

UDALL '76 COMMITTEE

2 U.S.C. 434(b)(12) requires continuous reporting of debts and obligations owed to or by the committee until extinguished, (including final payments on debts which reduce outstanding balances to zero).

The following state committees reported transferral of debts to the Udall '76 Committee which do not appear on Schedule C for the Principal Campaign Committee:

Udall '76 California Committee

Button Works	\$ 120.00	5/13/76
Bob Swanson	80.00	4/25/76
Bernie Hennessy	70.00	
Jim Fay	120.00	6/24/76
rent for headquarters	600.00	6/1/76
Xerox Corp.	100.28	6/29/76
General Discounts	56.18	6/21/76
Pacific Telephone	14.44	4/17/76
	198.54	"
	22.77	5/17/76
	1732.44	4/13/76
Subtotal	1968.19	

Bill Lunch	17.07	5/15/76
Roy B. Christman	25.00	
Arthur Blaunstein	180.00	6/1/76
c/o Jim Fay		

Washington Citizens for Udall '76

Franklin Press	\$ 90.00	6/30/76
Martin Smith Mgmt.	140.00	6/30/76
Washington State		
Democratic Central Comm.	75.00	6/30/76
Sherry Thompson	106.08	6/30/76
Gary Stein	6.19	6/30/76
Sharon Wylie	100.00	6/30/76
Bob Swanson	49.89	6/30/76

Arizona - Udall '76 Committee

Goodman's	\$ 19.25	6/6/76
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Iowa Udall '76 Committee

Frank Martin	\$ 149.15	1/20/76
Ralph Bradshaw	147.15	1/20/76
Cliff Larson	84.48	1/31/76
Chris Cohen	77.04	1/20/76

Michigan Udall for President

Lickety Split	\$ 498.89	7/31/76
Michigan Bell	14,762.81	(7088.85 paid)

New Hampshire Udall '76 Committee

Kanteres Real Estate	\$ 240.00	3/15/76
Maurice Murphy	226.00	4/27/76
Steve Kelespie	10.20	

New Mexico Udall '76 Committee

Mountain Bell Telephone	600.00	(owed to the committee)
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Please also note that any expenditures made in excess of \$100 for the repayment of debts

REQUEST FOR ADDITIONAL INFORMATION

Page three

UDALL '76 COMMITTEE

must be itemized on Schedule B and identified as such. Please amend your reports to include Schedules previously omitted.

82040323672

REQUEST FOR ADDITIONAL INFORMATION

Page three

UDALL '76 COMMITTEE

must be itemized on Schedule B and identified as such. Please amend your reports to include Schedules previously omitted.

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Richard C. Kelley
6221 Sycamore N.W.
Seattle, Washington 98107

November 16, 1976

Dear Dick,

We have your letter of November 11 concerning debts you ran up during the spring. In reviewing the FEC reports for the Washington Committee for 1976, I note that you have had revenues of approximately \$13,000. Since all of the expenditures were classified as Fund Raising, we find it hard to understand how you could allow expenses and debts to get so far out of hand. Together with the responsibility and authority of running a state committee comes the responsibility for keeping expenses in line.

Since the national campaign already had substantial debts to pay off, we see little prospect that we will be able to make any substantial payments on state committee debts. As I indicated to Lorraine Christianson some time ago, the IRS form 941s reflecting tax liabilities for the second and third quarters should be amended to reflect only those wages which have been actually paid. Once these reports are complete, they should be sent to us for payment in behalf of the Washington Committee. The sooner this is done the better since Lorraine could be personally liable for fines and interest.

Sincerely,

Gordon C. Squire
Assistant to National Treasurer

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Washington Citizens for

UDALL '76

~~BOX 2002 SEATTLE WASHINGTON 98107 206-622-9072~~

6221 Sycamore N.W., Seattle, 98107 206-789-1344

walk in address: 502-2nd Avenue.

November 11, 1976

Dear Fran,

Enclosed please find a new copy of our statement from North Seattle Printing.

Lorraine Christianson spoke with the I.D.S. and filled out the necessary paperwork, as your associate instructed her over the phone, to amend our previous return.

All of the bills we transferred to you for payment are very seriously overdue. The management company for our Smith Tower office space is threatening to sue me personally over that last month's rent. North Seattle Printing and Franklin Press are good Democratic printers with whom both credit and good opinion is very important in this town. The other debts are to people who gave in many ways of themselves to help Mo Udall.

I would like to see all of these bills paid immediately, and some record of the payments sent to me. If you need some sort of additional proof that these are actually obligations owing, please let me know exactly what you need immediately. If the Committee cannot pay all of these in full right now, please call me right away and we can discuss what might be an appropriate payment schedule and first installment.

I think we have been patient, Fran, but it seems that our patience is not being particularly rewarded. I hate to have to pressure the Committee again, but nothing ever seems to come our way without pressure.

I hope to hear from you very soon.

Sincerely,

Richard C. Kelley
Richard C. Kelley,
State Coordinator

RECEIVED
11/15/76

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UDALL FOR PRESIDENT

Office of the National Treasurer
122 East 42 Street, New York, N.Y. 10017 • (212) 683-7870

September 7, 1977

Mr. S. E. Sallee
Internal Revenue Service
915 Second Avenue
Seattle, Washington 98174

Dear Mr. Sallee:

I apologize for the delay in sending the enclosed check to your attention, but I have been away from my desk for a couple of weeks, and did not receive your letter until yesterday.

I trust that this matter is now settled. Should you need any further information on our Washington committee, do not hesitate to contact me.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Carol A. Ziemer'.

Carol A. Ziemer
Udall '76 Committee

/cz
enc.

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Internal Revenue Service
District Director

Department of the Treasury

Date May 31, 1977

Social Security or
Employer Identification Number
91-0954415

Tax Period Ending
06-30-76

Kind of Tax
941

Person to Contact
S. E. Salice

Contact Telephone Number
442-5144

► Washington Citizens for Udall '76
6221 Sycamore N.W.
Seattle, WA 98107

(206)

Dear Sirs

We received your inquiry about the amount due on your account.

The total amount due, shown below, includes interest as provided by law (see enclosed Notice 394). The late payment penalty, if any, is computed at the rate of $\frac{1}{2}$ of 1 percent of the unpaid tax for each month or part of a month the tax was unpaid, not to exceed a total of 25 percent.

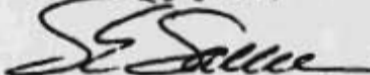
Amount of tax \$	414.29
Interest	25.52
Penalty	22.79
Lien fees	
Total amount due \$	462.60

Please make your check or money order payable to the Internal Revenue Service and show your social security or employer identification number on it. Enclosed is a self-addressed envelope for your convenience in making your payment.

If you have any questions, please contact the person whose name and telephone number are shown above.

Thank you for your cooperation.

Sincerely yours,



S. E. Salice
Revenue Officer

Enclosures:
Notice 394
Envelope

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September 29, 1977

Ms. Lorraine Christianson
2111 NW 86th Street
Seattle, Washington 98117

Dear Lorraine:

When I came into the office this morning, I discovered a few more items that I should have mentioned to you in our telephone conversation last night. As I did mention, the bank statements and the canceled checks from the inception of the Washington account are a must for the auditors to look at.

In addition, included with the materials you sent were a couple of statements pertaining to the "Citizens for Dick Kelly" committee. Since that Committee did transfer funds to the Udall committee, can you please explain the connection between the two? Also, please forward any other bank statements for the Dick Kelly committee.

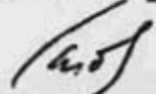
It is noted that all 1976 expenditures were allocated to fundraising, but there is no note of any fundraising activities in your reports. Please explain. Also, all expenses for a three month period April thru June were listed as unitemized, although many were over the \$100.00 cut off point.

I have enclosed a list of the items that were expenditures but remain undocumented. Please let me know immediately if you have any of this documentation so that I can request it from the individuals as soon as possible if need be.

Any information you can give me on the above matters will be most appreciated. Perhaps Dick Kelly can shed some light on some of these matters. I do not have his current home address and telephone number. If you can send them to me, perhaps we can make more progress.

Thank you for your continued interest.

Sincerely,


Carol A. Ziemer
Udall '76 Committee

/cz

82040323678



UDALL FOR PRESIDENT
Office of the National Treasurer
122 East 42 Street, New York, N.Y. 10017 • (212) 697-2233

December 3, 1979

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

Attn: Charles Steele
Acting General Counsel

Re: MJR 993


Dear Mr. Steele:

The Udall '76 Committee is responding to your letter of October 18, 1979, on behalf of the Pennsylvania Udall '76 Committee.

Enclosed please find a Comprehensive Amendment for the year 1976 which itemizes expenditures totaling \$19,721.87 which had been previously omitted from the Committee's reports.

If you should have any further questions, please contact Mr. Edward Coyle of Congressman Udall's staff, at (202)225-9790.

Sincerely,


STANLEY KURZ
National Treasurer

SK:ejd

cc: Honorable Morris K. Udall
Erik Mark Brown, Treasurer
Pennsylvania Udall '76 Committee
James D. Pembroke, Esq.

Internal Revenue Service
District Director

Department of the Treasury

Date: May 31, 1977

Social Security or
Employer Identification Number:
91-0954415

Tax Period Ending:
06-30-76

Kind of Tax:
941

Person to Contact:
S. E. Sallee

Contact Telephone Number:

(206) 442-5144

Washington Citizens for Udall '76
6221 Sycamore N.W.
Seattle, WA 98107

Dear Sirs:

We received your inquiry about the amount due on your account.

The total amount due, shown below, includes interest as provided by law (see enclosed Notice 394). The late payment penalty, if any, is computed at the rate of $\frac{1}{2}$ of 1 percent of the unpaid tax for each month or part of a month the tax was unpaid, not to exceed a total of 25 percent.

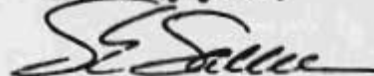
Amount of tax \$	414.29
Interest	25.52
Penalty	22.79
Lien fees	
Total amount due \$	462.60

Please make your check or money order payable to the Internal Revenue Service and show your social security or employer identification number on it. Enclosed is a self-addressed envelope for your convenience in making your payment.

If you have any questions, please contact the person whose name and telephone number are shown above.

Thank you for your cooperation.

Sincerely yours,



S. E. Sallee
Revenue Officer

Enclosures:
Notice 394
Envelope

82040323600



September 29, 1977

Ms. Lorraine Christianson
2111 NW 86th Street
Seattle, Washington 98117

Dear Lorraine:

When I came into the office this morning, I discovered a few more items that I should have mentioned to you in our telephone conversation last night. As I did mention, the bank statements and the canceled checks from the inception of the Washington account are a must for the auditors to look at.

In addition, included with the materials you sent were a couple of statements pertaining to the "Citizens for Dick Kelly" committee. Since that Committee did transfer funds to the Udall committee, can you please explain the connection between the two? Also, please forward any other bank statements for the Dick Kelly committee.

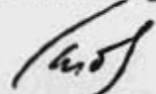
It is noted that all 1976 expenditures were allocated to fundraising, but there is no note of any fundraising activities in your reports. Please explain. Also, all expenses for a three month period April thru June were listed as unitemized, although many were over the \$100.00 cut off point.

I have enclosed a list of the items that were expenditures but remain undocumented. Please let me know immediately if you have any of this documentation so that I can request it from the individuals as soon as possible if need be.

Any information you can give me on the above matters will be most appreciated. Perhaps Dick Kelly can shed some light on some of these matters. I do not have his current home address and telephone number. If you can send them to me, perhaps we can make more progress.

Thank you for your continued interest.

Sincerely,


Carol A. Ziemer
Udall '76 Committee

/cz

Paid for by the Udall '76 committee. See U.S. Form 1041-1042

82040323681

**REPORT OF RECEIPTS AND EXPENDITURES
 FOR A CANDIDATE OR COMMITTEE
 SUPPORTING CANDIDATE(S) FOR
 NOMINATION OR ELECTION TO FEDERAL OFFICE**

(Except for Candidates or Committees Receiving Federal Matching Funds)

Note: Committees authorized by a candidate to receive contributions and make expenditures in connection with more than one election must maintain separate records with respect to each election.

1 PENNSYLVANIA UDALL '76 COMMITTEE 2 I.D. No. _____ Candidates/Committee
 Name of Candidate or Committee (in full)
96 UDALL '76 COMMITTEE, 122 EAST 42 STREET 3 PRESIDENCY
 Address (number and street) Office Sought, State/District (if applicable)
NEW YORK, NEW YORK 10017
 City, State and ZIP Code Check if address is different than previously reported. Year of Election 1976

4 Type of Report (check appropriate boxes)
 April 10 Quarterly Report Tenth day report preceding _____ election (primary, general or convention) Termination Report
 July 10 Quarterly Report on _____ in the State of _____ Amendment for: 1976 (which report)
 October 10 Quarterly Report Thirtieth day report following _____ election (primary, general or convention)
 January 31 Annual Report
 Monthly Report _____ on _____ in the State of _____ (month) (date)
 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 This Period	Column B Calendar Year-To-Date
<u>11/1/76</u> Through <u>12/31/76</u>		
6 Cash on hand January 1, 19 <u>COMPREHENSIVE ATTENDMENT - ADJUSTMENTS</u>		\$ 0
7 Cash on hand at beginning of reporting period <u>(AS REPORTED 11/25/76)</u>	\$ 0	
8 Total receipts (from line 19)	\$ 0	\$ 97,675.89
(a) Subtotal (Add lines 7 and 8 for Column A and lines 6 and 8 for Column B)	\$ 0	\$ 97,675.89
9 Total expenditures (from line 25)	\$ 19,721.87	\$ 117,397.76
10 Cash on hand at close of reporting period (Subtract line 9 from line 8a)	\$ (19,721.87)	\$ (19,721.87)
11 Value of contributed items on hand to be liquidated (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.
1/25/79 (Date) STANLEY KURZ, NATIONAL TREASURER (Typed Name of Treasurer or Candidate) Stanley Kurz (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 441j (see reverse side of form).

For further information, Contact:

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

or call 800/424-9530

Approved by GAO
 B-187620 (R0506)
 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.

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DETAILED SUMMARY OF RECEIPTS AND EXPENDITURES
(Page 2, FEC FORM 3)

NAME OF CANDIDATE OR COMMITTEE		REPORT COVERING THE PERIOD	
PENNSYLVANIA WORK '76 COMMITTEE		FROM: 11/1/76	TO: 12/31/76
RECEIPTS		Column A This Period	Column B Calendar Year-To-Date
COMPREHENSIVE AMENDMENT - ADJUSTMENTS			
14. Contributions from individuals (including contributions in-kind):			
(a) Itemized (use Schedule A)		\$ 00	
(b) Unitemized		\$ 00	
(c) Sales and collections included above: List by event on memo Schedule D (\$ _____)			
(d) Subtotal of contributions from individuals		\$ 0	\$ 9919.34
15. Transfers from Political Committees:			
(a) Funds from affiliated/authorized committee (itemize on Schedule A regardless of amount)		\$ 00	
(b) Funds from other committees (itemize on Schedule A regardless of amount)		\$ 00	
(c) Contributions in-kind from political committees (itemize on Schedule A regardless of amount)		\$ 00	
(d) Subtotal of transfers in and contributions in-kind from political committees		\$ 00	\$ 87657.51
16. Other income:			
(a) Itemized (use Schedule A)		\$ 00	
(b) Unitemized		\$ 00	
(c) Subtotal of other income		\$ 00	\$
17. Loans and Loan Repayments Received:			
(a) Itemized (use Schedule A)		\$ 00	
(b) Unitemized		\$ 00	
(c) Subtotal of loans and loan repayments received		\$ 00	\$
18. Refunds, Rebates, Returns of Deposits:			
(a) Itemized (use Schedule A)		\$ 00	
(b) Unitemized		\$ 00	
(c) Subtotal of refunds, rebates, returns of deposits		\$ 00	\$ 99.04
19. Total Receipts		\$ 0	\$ 97,675.89
EXPENDITURES			
Operating Expenditures:			
(a) Itemized (use Schedule B)		\$ 19,721.87	
(b) Unitemized		\$ 0	
(c) Subtotal of operating expenditures		\$ 19,721.87	\$ 115,019.17
Loans, Loan Repayments, and Contribution Refunds Made:			
(a) Itemized (use Schedule B)		\$ 00	
(b) Unitemized		\$ 00	
(c) Subtotal of loans and loan repayments made and contribution refunds		\$ 00	\$
Transfers Out to Political Committees:			
(a) To affiliated/authorized committee (itemize on Schedule B regardless of amount)		\$ 00	
(b) To other committees (itemize on Schedule B regardless of amount)		\$ 00	
(c) Contributions in-kind to other committees (itemize on Schedule B regardless of amount)		\$ 00	
(d) Subtotal of transfers out		\$ 00	\$
23. Independent Expenditures (use Schedule E)		\$ 00	\$
24. Coordinated Expenditures Made by Political Committees (2 U.S.C. 441a(d)) - (itemize on Schedule F) ... FUNDRAISING EXPENDITURES		\$ 0	\$ 2378.59
25. Total Expenditures		\$ 19,721.87	\$ 117,397.76
RECEIPTS AND EXPENDITURES, NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES			
26. Total Receipts (from line 19)		\$ 0	
27. Transfers In (from line 15(a))		\$ 0	
28. Net Receipts (Subtract line 27 from line 26)		\$ 0	
29. Total Expenditures (from line 25)		\$ 19,721.87	
30. Transfers Out (from line 22(a))		\$ 0	
31. Net Expenditures (Subtract line 30 from line 29)		\$ 19,721.87	

ITEMIZED EXPENDITURES
 (Operating, Transfers Out, Contributions in-Kind,
 Loans, Loan Repayments and Refunds Made)
 Supporting Lines 20a, 21a, and 22a, 22b, and 22c
 of FEC FORM 3

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Name of Candidate or Committee in Full <u>PENNSYLVANIA WALL '76 COMMITTEE</u> <u>AMENDMENT</u>			
Full Name, Mailing Address and ZIP Code <u>WHYL</u>	Particulars of Expenditure <u>ALTERNATIVE MONTHLY REPORT</u> <u>4/11/76 - 4/30/76 ADDITION</u>	Date (month, day, year) <u>4/24/76</u>	Amount of each expenditure this period <u>133.00</u>
	<u>PREVIOUSLY OMITTED</u> Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code <u>ALAN F. WOHLATETTER</u>	Particulars of Expenditure <u>SAME</u> <u>ADDITION</u>	Date (month, day, year) <u>4/29/76</u>	Amount of each expenditure this period <u>255.00</u>
	<u>PREVIOUSLY OMITTED</u> Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code <u>TALL TIMBERS MOTEL</u>	Particulars of Expenditure <u>SAME</u> <u>ADDITION</u>	Date (month, day, year) <u>4/22/76</u>	Amount of each expenditure this period <u>311.64</u>
	<u>PREVIOUSLY OMITTED</u> Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code <u>WSBA</u>	Particulars of Expenditure <u>SAME</u> <u>ADDITION</u>	Date (month, day, year) <u>4/26/76</u>	Amount of each expenditure this period <u>120.00</u>
	<u>PREVIOUSLY OMITTED</u> Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code <u>MURRAY MILKMAN</u>	Particulars of Expenditure <u>SAME</u> <u>ADDITION</u>	Date (month, day, year) <u>4/30/76</u>	Amount of each expenditure this period <u>135.00</u>
	<u>PREVIOUSLY OMITTED</u> Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code <u>JACK MARTIN</u>	Particulars of Expenditure <u>SAME</u> <u>ADDITION</u>	Date (month, day, year) <u>4/19/76</u>	Amount of each expenditure this period <u>150.00</u>
	<u>PREVIOUSLY OMITTED</u> Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code <u>THE PATRIOT</u>	Particulars of Expenditure <u>SAME</u> <u>ADDITION</u>	Date (month, day, year) <u>4/19/76</u>	Amount of each expenditure this period <u>240.36</u>
	<u>PREVIOUSLY OMITTED</u> Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code <u>DEBBIE ZURKOW</u>	Particulars of Expenditure <u>SAME</u> <u>ADDITION</u>	Date (month, day, year) <u>4/24/76</u>	Amount of each expenditure this period <u>240.00</u>
	<u>PREVIOUSLY OMITTED</u> Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
SUBTOTAL of expenditures this page (optional)			\$ <u>1766.64</u>
TOTAL this period (last page this line number only)			\$

ITEMIZED EXPENDITURES
 (Operating, Transfers Out, Contributions In-Kind,
 Loans, Loan Repayments and Refunds Made)
 Supporting Lines 20a, 21a, and 22a, 22b, and 22c
 of FEC FORM 3

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Name of Candidate or Committee in Full			
PENNSYLVANIA WOALL '76 COMMITTEE		AMENDMENT	
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
WCMB	ALTERNATIVE MONTHLY REPORT 4/1/76 - 4/30/76 ADDITION PREVIOUSLY OMITTED	4/24/76	166.50
Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
POSTAL INSTANT PRESS	SAME ADDITION PREVIOUSLY OMITTED	4/24/76	145.59
Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
RAPID OFFSET PRINTING	SAME ADDITION PREVIOUSLY OMITTED	4/23/76	294.15
Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
MICHAEL KURTMAN	SAME ADDITION PREVIOUSLY OMITTED	4/28/76	115.00
Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
ROBERT BEDARO	SAME ADDITION PREVIOUSLY OMITTED	4/27/76	400.00
Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
GREG COLLINS	SAME ADDITION PREVIOUSLY OMITTED	4/29/76	110.00
Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
PAUL COSTELLO	SAME ADDITION PREVIOUSLY OMITTED	4/29/76	300.00
Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
ROBERT BEDARO	SAME ADDITION PREVIOUSLY OMITTED	4/19/76	1,500.00
Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
SUBTOTAL of expenditures this page (optional)			\$ 4931.24
TOTAL this period (last page this line number only)			\$

ITEMIZED EXPENDITURES
 (Operating, Transfers Out, Contributions In-Kind,
 Loans, Loan Repayments and Refunds Made)
 Supporting Lines 20a, 21a, and 22a, 22b, and 22c
 of FEC FORM 3

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Name of Candidate or Committee in Full			
<u>PENNSYLVANIA WALL '76 COMMITTEE</u> <u>AMENDMENT</u>			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
<u>DAVID EVANS</u>	<u>ALTERNATIVE MONTHLY REPORT</u> <u>4/1/76 - 4/30/76 ADDITION</u>		
	<u>PREVIOUSLY OMITTED</u> Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<u>4/23/76</u>	<u>500.00</u>
<u>PETER GOLDBERG</u>	<u>SAME ADDITION</u>	<u>4/24/76</u>	<u>545.00</u>
	<u>PREVIOUSLY OMITTED</u> Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<u>4/23/76</u>	<u>150.00</u>
<u>DAUL MCILWAIN</u>	<u>SAME ADDITION</u>	<u>4/23/76</u>	<u>175.00</u>
	<u>PREVIOUSLY OMITTED</u> Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
<u>MARY SHANAHAN</u>	<u>SAME ADDITION</u>	<u>4/20/76</u>	<u>400.00</u>
	<u>PREVIOUSLY OMITTED</u> Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
<u>WILLIAM B. WACHTEL</u>	<u>SAME ADDITION</u>	<u>4/26/76</u>	<u>400.00</u>
	<u>PREVIOUSLY OMITTED</u> Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<u>4/24/76</u>	<u>1,500.00</u>
<u>JACK MARTIN</u>	<u>SAME ADDITION</u>	<u>4/22/76</u>	<u>250.00</u>
	<u>PREVIOUSLY OMITTED</u> Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
<u>MARK MENDEL</u>	<u>SAME ADDITION</u>	<u>4/26/76</u>	<u>125.00</u>
	<u>PREVIOUSLY OMITTED</u> Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
<u>GENERAL TELEPHONE CO.</u> <u>31 SOUTH BEAVER ST.</u> <u>YORK, PA.</u>	<u>SAME ADDITION</u>	<u>4/2/76</u>	<u>287.00</u>
	<u>PREVIOUSLY OMITTED</u> Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
SUBTOTAL of expenditures this page (optional)			\$ <u>4332.00</u>
TOTAL this period (last page this line number only)			\$

ITEMIZED EXPENDITURES
 (Operating, Transfers Out, Contributions in-Kind,
 Loans, Loan Repayments and Refunds Made)
 Supporting Lines 20a, 21a, and 22a, 22b, and 22c
 of FEC FORM 3

(Use Separate Schedules for
 each numbered line)

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Name of Candidate or Committee in Full			
PENNSYLVANIA WALL '76 COMMITTEE <u>AMENDMENT</u>			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
ROSE TREE TIRE CO.	<u>ALTERNATIVE MONTHLY REPORT 3/1/76 - 3/31/76</u> <u>ADDITION</u> <u>PREVIOUSLY OMITTED</u>	3/13/76	115.00
Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
DEBBIE ZURKOW	<u>ALTERNATIVE MONTHLY REPORT 4/1/76 - 4/30/76</u> <u>ADDITION</u> <u>PREVIOUSLY OMITTED</u>	4/20/76	150.00
Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
MARY SHANAHAN	<u>SAME</u> <u>ADDITION</u> <u>PREVIOUSLY OMITTED</u>	4/16/76	300.00
Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
DAVID EVANS	<u>SAME</u> <u>ADDITION</u> <u>PREVIOUSLY OMITTED</u>	4/22/76	650.00
Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
GERALD McLAUGHLIN	<u>SAME</u> <u>ADDITION</u> <u>PREVIOUSLY OMITTED</u>	4/17/76	500.00
Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
PAUL TULLY 845 BOYLSTON STREET BOSTON, MASS.	<u>SAME</u> <u>ADDITION</u> <u>PREVIOUSLY OMITTED</u>	4/17/76	150.00
Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
MAY ASSOCIATES 801 PAYNE SHEPHERD BLDG. HARRISBURG, PA.	<u>SAME</u> <u>ADDITION</u> <u>PREVIOUSLY OMITTED</u>	4/13/76	350.00
Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
LEE CASPER	<u>SAME</u> <u>ADDITION</u> <u>PREVIOUSLY OMITTED</u>	4/2/76	150.00
Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
SUBTOTAL of expenditures this page (optional)			\$ 2365.00
TOTAL this period (last page this line number only)			\$

ITEMIZED EXPENDITURES
 (Operating, Transfers Out, Contributions In-Kind,
 Loans, Loan Repayments and Refunds Made)
 Supporting Lines 20a, 21a, and 22a, 22b, and 22c
 of FEC FORM 3

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Name of Candidate or Committee in Full <i>PENNSYLVANIA WOALL '76 COMMITTEE</i> <u>AMENDMENT</u>			
Full Name, Mailing Address and ZIP Code <i>RICHARD DILUCAS</i>	Particulars of Expenditure <u>ALTERNATIVE MONTHLY REPORT</u> <u>4/1/76 - 4/30/76 ADDITION</u> <u>PREVIOUSLY OMITTED</u> Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year) <i>4/2/76</i>	Amount of each expenditure this period <i>125.00</i>
Full Name, Mailing Address and ZIP Code <i>SUSAN BURDICK</i>	Particulars of Expenditure <u>ALTERNATIVE MONTHLY REPORT</u> <u>3/1/76 - 3/31/76 ADDITION</u> <u>PREVIOUSLY OMITTED</u> Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year) <i>3/25/76</i>	Amount of each expenditure this period <i>225.00</i>
Full Name, Mailing Address and ZIP Code <i>FULTON BANK</i>	Particulars of Expenditure <u>JAME</u> <u>ADDITION</u> <u>PREVIOUSLY OMITTED</u> Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year) <i>3/1/76</i>	Amount of each expenditure this period <i>650.00</i>
Full Name, Mailing Address and ZIP Code <i>FRANCIS BIDDLE</i>	Particulars of Expenditure <u>JAME</u> <u>ADDITION</u> <u>PREVIOUSLY OMITTED</u> Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year) <i>3/13/76</i>	Amount of each expenditure this period <i>650.00</i>
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
SUBTOTAL of expenditures this page (optional)			\$ <i>1650.00</i>
TOTAL this period (last page this line number only)			\$

ITEMIZED EXPENDITURES
 (Operating, Transfers Out, Contributions In-Kind,
 Loans, Loan Repayments and Refunds Made)
 Supporting Lines 20a, 21a, and 22a, 22b, and 22c
 of FEC FORM 3

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Name of Candidate or Committee in Full			
PENNSYLVANIA WALL '76 COMMITTEE			
AMENDMENT			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
PHILADELPHIA PARTY 1315 WALNUT STREET PHILADELPHIA, PA. 19107	ALTERNATIVE MONTHLY REPORT 3/1/76 - 3/31/76 ADDITION	3/76	3159.50
	APPROXIMATELY OBTAINED Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
PHILADELPHIA PARTY 1315 WALNUT STREET PHILADELPHIA, PA. 19107	ALTERNATIVE MONTHLY REPORT 4/1/76 - 4/30/76	4/25/76	(3245.00) 2500.00
	CORRECTION Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
SUBTOTAL of expenditures this page (optional)			\$ 2414.50
TOTAL this period (last page this line number only)			\$

ITEMIZED EXPENDITURES
 (Operating, Transfers Out, Contributions In-Kind,
 Loans, Loan Repayments and Refunds Made)
 Supporting Lines 20a, 21a, and 22a, 22b, and 22c
 of FEC FORM 3

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Name of Candidate or Committee in Full			
PENNSYLVANIA WALL '76 COMMITTEE AMENDMENT			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
ROBERT MULLIGAN 4329 SPRUCE STREET PHILADELPHIA, PA.	ALTERNATIVE MONTHLY REPORT 4/1/76 - 4/30/76 ADDITION PREVIOUSLY OMITTED Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	4/76	\$ 2265.99
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
SAME	ALTERNATIVE MONTHLY REPORT 8/1/76 - 8/31/76 ADDITION PREVIOUSLY OMITTED Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	8/76	320.76
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
SAME	ALTERNATIVE MONTHLY REPORT 9/1/76 - 9/30/76 CORRECTION PREVIOUSLY OMITTED Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	9/30/76	(875.00) 300.00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
SAME	ALTERNATIVE MONTHLY REPORT 10/1/76 - 10/31/76 ADDITION PREVIOUSLY OMITTED Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	10/76	250.74
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
SUBTOTAL of expenditures this page (optional)			\$ 2,262.49
TOTAL this period (last page this line number only)			\$ 19,721.87



UDALL FOR PRESIDENT
 Office of the National Treasurer
 122 East 42 Street, New York, N.Y. 10017 • (212) 697-2233

December 3, 1979

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

Attn: Charles Steele
 Acting General Counsel

Re: MUR 993

Dear Mr. Steele:

The Udall '76 Committee is responding to your letter of October 18, 1979, on behalf of the Wisconsin Udall '76 Committee.

Enclosed please find Comprehensive Amendments for the years 1975 and 1976. These amended reports include receipts and expenditures that were previously omitted. Please note that these amendments were done from worksheets provided to us by the Audit staff (copies enclosed) and that in some cases the specific date was illegible. In those cases, we have noted only the year.

We feel that these amended reports will satisfy the Commission's analysis of the matters noted in the October 18th letter.

If you should have any further questions, please contact Mr. Edward Coyle of Congressman Udall's staff, at (202)225-9790.

Sincerely,

Stanley Kurz
 STANLEY KURZ
 National Treasurer

SK:ejd

cc: Honorable Morris K. Udall
 Ellen M. Kozak, Treasurer
 Wisconsin Udall '76 Committee
 James D. Pembroke, Esq.

82040323691



**REPORT OF RECEIPTS AND EXPENDITURES
 FOR A CANDIDATE OR COMMITTEE
 SUPPORTING CANDIDATE(S) FOR
 NOMINATION OR ELECTION TO FEDERAL OFFICE**

(Except for Candidates or Committees Receiving Federal Matching Funds)

Note: Committees authorized by a candidate to receive contributions and make expenditures in connection with more than one election must maintain separate records with respect to each election.

1 WISCONSIN UOALL '76 COMMITTEE 2 I.D. No. _____
 Name of Candidate or Committee (in full) Candidate/Committee
96 UOALL '76 COMMITTEE, 122 EAST 42 ST. PRESIDENTLY
 Address (number and street) Office Sought, State/District (if applicable)
NEW YORK, NEW YORK 10017
 City, State and ZIP Code Check if address is different than previously reported. Year of Election 1976

4 Type of Report (check appropriate boxes)

- April 10 Quarterly Report Tenth day report preceding _____ election
 (primary, general or convention) Termination Report
 July 10 Quarterly Report on _____ in the State of _____
 (date) Amendment for:
 October 10 Quarterly Report Thirtieth day report following _____ election
 (primary, general or convention) 1975
 (which report)
 January 31 Annual Report
 Monthly Report _____ on _____ in the State of _____
 (month) (date)
 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 This Period	Column B Calendar Year-To-Date
<u>1/1/75</u> Through <u>12/31/75</u>		
6 Cash on hand January 1, 19 <u>COMPREHENSIVE AMENDMENT - ADJUSTMENTS</u>		\$ <u>0</u>
7 Cash on hand at beginning of reporting period <u>(AS REPORTED - 12/31/75)</u>	\$ <u>344.26</u>	
8 Total receipts (from line 19)	\$ <u>1165.00</u>	\$ <u>31,315.68</u>
(a) Subtotal (Add lines 7 and 8 for Column A and lines 6 and 8 for Column B)	\$ <u>1509.26</u>	\$ <u>31,315.68</u>
9 Total expenditures (from line 25)	\$ <u>750.00</u>	\$ <u>30,556.42</u>
10 Cash on hand at close of reporting period (Subtract line 9 from line 8a)	\$ <u>759.26</u>	\$ <u>759.26</u>
11 Value of contributed items on hand to be liquidated (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.

1/5/79
 (Date)

STANLEY KURZ, NATIONAL TREASURER
 (Typed Name of Treasurer or Candidate)

Stanley Kurz
 (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 441j (see reverse side of form).

For further information, Contact:

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

or call 800/424-9530

Approved by GAO
 B-187620 (R0506)
 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.

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DETAILED SUMMARY OF RECEIPTS AND EXPENDITURES
(Page 2, FEC FORM 3)

NAME OF CANDIDATE OR COMMITTEE		REPORT COVERING THE PERIOD	
WISCONSIN UDALL '76 COMMITTEE		FROM: 11/1/75	TO: 12/31/75
RECEIPTS		Column A	Column B
COMPREHENSIVE ATTENDMENT - ADJUSTMENTS		This Period	Calendar Year-To-Date
14. Contributions from Individuals (including contributions in-kind):			
(a) Itemized (use Schedule A)	\$ 1,165.00		
(b) Unitemized	\$ 0		
(c) Sales and collections included above:			
List by event on memo Schedule D (\$ _____)			
(d) Subtotal of contributions from individuals	\$ 1,165.00		\$ 7,764.73
15. Transfers from Political Committees:			
(a) Funds from affiliated/authorized committee (itemize on Schedule A regardless of amount)	\$ 0		
(b) Funds from other committee (itemize on Schedule A regardless of amount)	\$ 0		
(c) Contributions in-kind from political committees (itemize on Schedule A regardless of amount)	\$ 0		
(d) Subtotal of transfers in and contributions in-kind from political committees	\$ 0		\$ 8,200.00
16. Other Income:			
(a) Itemized (use Schedule A)	\$ 0		
(b) Unitemized	\$ 0		
(c) Subtotal of other income	\$ 0		\$ 15,218.15
Loans and Loan Repayments Received:			
(a) Itemized (use Schedule A)	\$ 0		
(b) Unitemized	\$ 0		
(c) Subtotal of loans and loan repayments received	\$ 0		\$ 0
Refunds, Rebates, Returns of Deposits:			
(a) Itemized (use Schedule A)	\$ 0		
(b) Unitemized	\$ 0		
(c) Subtotal of refunds, rebates, returns of deposits	\$ 0		\$ 192.80
17. Total Receipts	\$ 1,165.00		\$ 31,315.68
EXPENDITURES			
18. Operating Expenditures:			
(a) Itemized (use Schedule B)	\$ 750.00		
(b) Unitemized	\$ 0		
(c) Subtotal of operating expenditures	\$ 750.00		\$ 8,182.26
Loans, Loan Repayments, and Contribution Refunds Made:			
(a) Itemized (use Schedule B)	\$ 0		
(b) Unitemized	\$ 0		
(c) Subtotal of loans and loan repayments made and contribution refunds	\$ 0		\$ 200.00
Transfers Out to Political Committees:			
(a) To affiliated/authorized committee (itemize on Schedule B regardless of amount)	\$ 0		
(b) To other committee (itemize on Schedule B regardless of amount)	\$ 0		
(c) Contributions in-kind to other committees (itemize on Schedule B regardless of amount)	\$ 0		
(d) Subtotal of transfers out	\$ 0		\$ 375.00
23. Independent Expenditures (use Schedule E)	\$ 0		\$
24. Coordinated-Expenditures-Made-by-Political-Committees (2 U.S.C. 441a(d)) (itemize on Schedule F) <i>MEDIA EXPENDITURES</i>	\$ 0		\$ 21,799.16
25. Total Expenditures	\$ 750.00		\$ 30,556.42
RECEIPTS AND EXPENDITURES, NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES			
26. Total Receipts (from line 17)	\$ 1,165.00		
27. Transfers In (from line 15(d))	\$ 0		
28. Net Receipts (Subtract line 27 from line 26)	\$ 1,165.00		
29. Total Expenditures (from line 25)	\$ 750.00		
30. Transfers Out (from line 22(e))	\$ 0		
31. Net Expenditures (Subtract line 30 from line 29)	\$ 750.00		

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 3

(Use Separate Schedules for
 each numbered line)

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Name of Candidate or Committee in Full			
WISCONSIN UDALL '76 COMMITTEE		AMENDMENT	
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
MARION M. BAUMAN 721 30TH AVENUE MONROE, WIS. 53566	DECEMBER 10 REPORT ADDITION SPECIALLY OMITTED Occupation	JULY 1975	25.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 107.50		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
SAME AS ABOVE	SAME AS ABOVE Occupation	JULY 1975	10.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 117.50		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
SAME AS ABOVE	SAME AS ABOVE Occupation	AUGUST 1975	20.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 137.50		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
SAME AS ABOVE	SAME AS ABOVE Occupation	AUGUST 1975	10.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 147.50		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
SAME AS ABOVE	SAME AS ABOVE Occupation	AUGUST 1975	5.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 152.50		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
SAME AS ABOVE	SAME AS ABOVE Occupation	1975	10.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 162.50		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
SAME AS ABOVE	SAME AS ABOVE Occupation	SEPT. 1975	10.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 172.50		
SUBTOTAL of receipts this page (optional)			\$ 90.00
TOTAL this period (last page this line number only)			\$

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

(Use Separate Schedules for
each numbered line)

15
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Name of Candidate or Committee in Full			
<u>WISCONSIN UDALL '76 COMMITTEE</u>		<u>AMENDMENT</u>	
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
<u>MARION M. BAUMAN</u> <u>721 30TH AVENUE</u> <u>MONROE, WIS. 53566</u>	<u>OCTOBER 10 REPORT</u> <u>ADDITION</u> <u>PREVIOUSLY OMITTED</u>	<u>SEPT.</u> <u>1975</u>	<u>5.00</u>
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed		
	Aggregate Year-To-Date ... \$ <u>177.50</u>		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
<u>SAME AS ABOVE</u>	<u>OCTOBER 10 REPORT</u> <u>ADDITION</u> <u>PREVIOUSLY OMITTED</u>	<u>SEPT.</u> <u>1975</u>	<u>10.00</u>
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed		
	Aggregate Year-To-Date ... \$ <u>187.50</u>		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
<u>MS. ANNE HANGER</u> <u>MELLON, WIS. 54546</u>	<u>OCTOBER 10 REPORT</u> <u>ADDITION</u> <u>PREVIOUSLY OMITTED</u>	<u>SEPT.</u> <u>1975</u>	<u>25.00</u>
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed		
	Aggregate Year-To-Date ... \$ <u>125.00</u>		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
<u>MR. MARTIN HANSON</u> <u>BOX 767</u> <u>MELLON, WIS. 54546</u>	<u>OCTOBER 10 REPORT</u> <u>ADDITION</u> <u>PREVIOUSLY OMITTED</u>	<u>SEPT.</u> <u>1975</u>	<u>200.00</u>
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed		
	Aggregate Year-To-Date ... \$ <u>205.00</u>		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
<u>MS. CAMILLA HANSON</u> <u>1435 4TH STREET NW</u> <u>WASHINGTON, D.C. 20024</u>	<u>OCTOBER 10 REPORT</u> <u>ADDITION</u> <u>PREVIOUSLY OMITTED</u>	<u>AUGUST</u> <u>1975</u>	<u>20.00</u>
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed		
	Aggregate Year-To-Date ... \$ <u>120.00</u>		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
<u>MS. MARY E. LESCHER</u> <u>1621 CAPITOL AVENUE</u> <u>MADISON, WIS. 53705</u>	<u>OCTOBER 10 REPORT</u> <u>ADDITION</u> <u>PREVIOUSLY OMITTED</u>	<u>AUGUST</u> <u>1975</u>	<u>20.00</u>
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed		
	Aggregate Year-To-Date ... \$ <u>111.00</u>		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
<u>SAME AS ABOVE</u>	<u>OCTOBER 10 REPORT</u> <u>ADDITION</u> <u>PREVIOUSLY OMITTED</u>	<u>AUGUST</u> <u>1975</u>	<u>35.00</u>
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed		
	Aggregate Year-To-Date ... \$ <u>146.00</u>		
SUBTOTAL of receipts this page (optional)			\$ <u>315.00</u>
TOTAL this period (last page this line number only)			\$

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

(Use Separate Schedules for
 each numbered line)

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Name of Candidate or Committee in Full			
<u>WISCONSIN UDALL 76 COMMITTEE</u> <u>AMENOTENT</u>			
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
<u>ROBERT L. METZENBERG, JR.</u> <u>2802 COLGATE ROAD</u> <u>MADISON, WIS. 53705</u>	<u>JANUARY 10 REPORT</u> <u>ADDITION</u> <u>PREVIOUSLY OMITTED</u>	<u>DECEMBER</u> <u>1975</u>	<u>100.00</u>
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed		
	Aggregate Year-To-Date . . . \$ <u>110.00</u>		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
<u>JOHN O'DONNELL</u> <u>3104 W. AMERICAN DRIVE</u> <u>GREENFIELD, WIS. 53221</u>	<u>JANUARY 10 REPORT</u> <u>ADDITION</u> <u>PREVIOUSLY OMITTED</u>	<u>11/5/75</u>	<u>25.00</u>
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed		
	Aggregate Year-To-Date . . . \$ <u>103.00</u>		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
<u>SAME AS ABOVE</u>	<u>JANUARY 10 REPORT</u> <u>ADDITION</u> <u>PREVIOUSLY OMITTED</u>	<u>12/22/75</u>	<u>15.00</u>
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed		
	Aggregate Year-To-Date . . . \$ <u>130.00</u>		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
<u>JACK STRING</u> <u>BOX 577</u> <u>MELTON, WIS. 54540</u>	<u>OCTOBER 10 REPORT</u> <u>ADDITION</u> <u>PREVIOUSLY OMITTED</u>	<u>8/16/75</u>	<u>20.00</u>
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed		
	Aggregate Year-To-Date . . . \$ <u>130.00</u>		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
<u>BURT ZIEN</u> <u>4450 OAKLAND</u> <u>MILWAUKEE, WIS. 53211</u>	<u>JANUARY 10 REPORT</u> <u>ADDITION</u> <u>PREVIOUSLY OMITTED</u>	<u>12/10/75</u>	<u>600.00</u>
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed		
	Aggregate Year-To-Date . . . \$ <u>1020.00</u>		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed		
	Aggregate Year-To-Date . . . \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed		
	Aggregate Year-To-Date . . . \$		
SUBTOTAL of receipts this page (optional)			\$ <u>760.00</u>
TOTAL this period (last page this line number only)			\$ <u>1,165.00</u>

ITEMIZED EXPENDITURES
 (Operating, Transfers Out, Contributions In-Kind,
 Loans, Loan Repayments and Refunds Made)
 Supporting Lines 20a, 21a, and 22a, 22b, and 22c
 of FEC FORM 3

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Name of Candidate or Committee in Full <u>WISCONSIN UDALL '76 COMMITTEE</u> <u>AMENDMENT</u>			
Full Name, Mailing Address and ZIP Code <u>CASH</u>	Particulars of Expenditure <u>JANUARY 10 REPORT</u> <u>ADDITION</u> <u>PREVIOUSLY OMITTED</u> Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year) <u>12/8/75</u>	Amount of each expenditure this period <u>150.00</u>
Full Name, Mailing Address and ZIP Code <u>CASH</u>	Particulars of Expenditure <u>JANUARY 10 REPORT</u> <u>ADDITION</u> <u>PREVIOUSLY OMITTED</u> Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year) <u>12/15/75</u>	Amount of each expenditure this period <u>200.00</u>
Full Name, Mailing Address and ZIP Code <u>CASH</u>	Particulars of Expenditure <u>JANUARY 10 REPORT</u> <u>ADDITION</u> <u>PREVIOUSLY OMITTED</u> Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year) <u>12/17/75</u>	Amount of each expenditure this period <u>400.00</u>
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period
SUBTOTAL of expenditures this page (optional)			\$ <u>750.00</u>
TOTAL this period (last page this line number only)			\$ <u>750.00</u>

**REPORT OF RECEIPTS AND EXPENDITURES
 FOR A CANDIDATE OR COMMITTEE
 SUPPORTING CANDIDATE(S) FOR
 NOMINATION OR ELECTION TO FEDERAL OFFICE**

(Except for Candidates or Committees Receiving Federal Matching Funds)

Note: Committees authorized by a candidate to receive contributions and make expenditures in connection with more than one election must maintain separate records with respect to each election.

1 CONSCIOUS WORLD '76 COMMITTEE 2 I.D. No. _____
 Name of Candidate or Committee (in full) Candidate/Committee
CONSCIOUS WORLD '76 COMMITTEE, 122 EAST 42 STREET 3 APPENDIX 4
 Address (number and street) Office Sought, State/District (if applicable)
NEW YORK, NEW YORK 10017
 City, State and ZIP Code Check if address is different than previously reported. Year of Election 1976

4 Type of Report (check appropriate boxes)

- April 10 Quarterly Report Tenth day report preceding _____ election
 (primary, general or convention) Termination Report
 July 10 Quarterly Report on _____ in the State of _____ Amendment for:
 (date) 1976
 October 10 Quarterly Report Thirtieth day report following _____ election
 (primary, general or convention) (which report)
 January 31 Annual Report Monthly Report _____ on _____ in the State of _____
 (month) (date)
 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 This Period	Column B Calendar Year-To-Date
<u>1/1/76</u> Through <u>12/31/76</u>		
6 Cash on hand January 1, 19 <u>COMPREHENSIVE AMENDMENT - ADJUSTMENTS</u>		\$ <u>344.26</u>
7 Cash on hand at beginning of reporting period (AS REPORTED 12/31/76)	\$ <u>3225.29</u>	
8 Total receipts (from line 19)	\$ <u>2267.50</u>	\$ <u>203,851.95</u>
(a) Subtotal (Add lines 7 and 8 for Column A and lines 6 and 8 for Column B)	\$ <u>5492.79</u>	\$ <u>204,196.21</u>
9 Total expenditures (from line 25)	\$ <u>4420.00</u>	\$ <u>203,098.92</u>
10 Cash on hand at close of reporting period (Subtract line 9 from line 8a)	\$ <u>1072.79</u>	\$ <u>1097.29</u>
11 Value of contributed items on hand to be liquidated (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.

NS/19 (Date) JIMMY KURTZ, NATIONAL TREASURER (Typed Name of Treasurer or Candidate) [Signature] (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 461 (see reverse side of form).

For further information, Contact:

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

or call 800/424-9530

Approved by GAO
 B-187620 (R0506)
 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.

82040323698

DETAILED SUMMARY OF RECEIPTS AND EXPENDITURES
(Page 2, FEC FORM 3)

NAME OF CANDIDATE OR COMMITTEE <i>WISCONSIN LOCAL '76 COMMITTEE</i>	REPORT COVERING THE PERIOD FROM: <i>1/1/76</i> TO: <i>12/31/76</i>	
RECEIPTS	Column A This Period	Column B Calendar Year-To-Date
<u>COMPREHENSIVE AMENDMENTS - ADJUSTMENTS</u>		
14. Contributions from individuals (including contributions in-kind):		
(a) Itemized (use Schedule A)	\$ <i>2267.50</i>	
(b) Unitemized	\$ <i>0</i>	
(c) Sales and collections included above: List by event on memo Schedule D (\$ _____)		
(d) Subtotal of contributions from individuals	\$ <i>2267.50</i>	\$ <i>36,792.70</i>
15. Transfers from Political Committees:		
(a) Funds from affiliated/authorized committee (itemize on Schedule A regardless of amount)	\$ <i>0</i>	
(b) Funds from other committees (itemize on Schedule A regardless of amount)	\$ <i>0</i>	
(c) Contributions in-kind from political committees (itemize on Schedule A regardless of amount)	\$ <i>0</i>	
(d) Subtotal of transfers in and contributions in-kind from political committees	\$ <i>0</i>	\$ <i>160,494.50</i>
16. Other Income:		
(a) Itemized (use Schedule A)	\$ <i>0</i>	
(b) Unitemized	\$ <i>0</i>	
(c) Subtotal of other income	\$ <i>0</i>	\$ <i>0</i>
Loans and Loan Repayments Received:		
(a) Itemized (use Schedule A)	\$ <i>0</i>	
(b) Unitemized	\$ <i>0</i>	
(c) Subtotal of loans and loan repayments received	\$ <i>0</i>	\$ <i>5550.00</i>
Refunds, Rebates, Returns of Deposits:		
(a) Itemized (use Schedule A)	\$ <i>0</i>	
(b) Unitemized	\$ <i>0</i>	
(c) Subtotal of refunds, rebates, returns of deposits	\$ <i>0</i>	\$ <i>1014.75</i>
19. Total Receipts	\$ <i>2267.50</i>	\$ <i>203,851.95</i>
EXPENDITURES		
Operating Expenditures:		
(a) Itemized (use Schedule B)	\$ <i>4420.00</i>	
(b) Unitemized	\$ <i>0</i>	
(c) Subtotal of operating expenditures	\$ <i>4420.00</i>	\$ <i>194,023.84</i>
Loans, Loan Repayments, and Contribution Refunds Made:		
(a) Itemized (use Schedule B)	\$ <i>0</i>	
(b) Unitemized	\$ <i>0</i>	
(c) Subtotal of loans and loan repayments made and contribution refunds	\$ <i>0</i>	\$ <i>200.00</i>
Transfers Out to Political Committees:		
(a) To affiliated/authorized committee (itemize on Schedule B regardless of amount)	\$ <i>0</i>	
(b) To other committees (itemize on Schedule B regardless of amount)	\$ <i>0</i>	
(c) Contributions in-kind to other committees (itemize on Schedule B regardless of amount)	\$ <i>0</i>	
(d) Subtotal of transfers out	\$ <i>0</i>	\$ <i>0</i>
23. Independent Expenditures (use Schedule E)	\$ <i>0</i>	\$ <i>0</i>
24. Coordinated Expenditures Made by Political Committees (2 U.S.C. 441a(d)) (itemize on Schedule F)	\$ <i>0</i>	\$ <i>8875.08</i>
<i>FUNDRAISING EXPENDITURES</i>		
25. Total Expenditures	\$ <i>4420.00</i>	\$ <i>203,098.92</i>
RECEIPTS AND EXPENDITURES, NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES		
26. Total Receipts (from line 19)	\$ <i>2267.50</i>	
27. Transfers In (from line 15(a))	\$ <i>0</i>	
28. Net Receipts (Subtract line 27 from line 26)	\$ <i>2267.50</i>	
29. Total Expenditures (from line 25)	\$ <i>4420.00</i>	
30. Transfers Out (from line 22(a))	\$ <i>0</i>	
31. Net Expenditures (Subtract line 30 from line 29)	\$ <i>4420.00</i>	

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

(Use Separate Schedules for
 each numbered line)

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Name of Candidate or Committee in Full			
WISCONSIN LOCAL '76 COMMITTEE		<u>AMENDMENT</u>	
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
IRVIN I. AARON 935 E. WELLS MILWAUKEE, WIS.	ALTERNATIVE MONTHLY REPORT 3/1/76 - 3/31/76 ADDITION PREVIOUSLY OMITTED	3/15/76	150.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 150.00		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
MARION M. BAUMAN 721 30TH AVENUE MONROE, WIS. 53566	SAME AS ABOVE ADDITION PREVIOUSLY OMITTED	3/76	35.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 104.00		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
SAME AS ABOVE	SAME AS ABOVE ADDITION PREVIOUSLY OMITTED	3/76	20.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 124.00		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
SAME AS ABOVE	SAME AS ABOVE ADDITION PREVIOUSLY OMITTED	3/76	1.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 125.00		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
MS. KATHLEEN CARLIN 1209 NORTH 46TH STREET MILWAUKEE, WIS. 53208	ALTERNATIVE MONTHLY REPORT 4/1/76 - 4/30/76 ADDITION PREVIOUSLY OMITTED	4/76	50.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 99.50		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
SAME AS ABOVE	SAME AS ABOVE ADDITION PREVIOUSLY OMITTED	4/76	15.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 114.50		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
GERALD S. COLBURN 200 WEST INDIAN CREEK MILWAUKEE, WIS. 53217	ADDITION PREVIOUSLY OMITTED	1976	250.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 250.00		
SUBTOTAL of receipts this page (optional)			\$ 521.00
TOTAL this period (last page this line number only)			\$

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

(Use Separate Schedules for
 each numbered line)

82040323701

Name of Candidate or Committee in Full			
<u>WISCONSIN WALL '76 COMMITTEE</u>		<u>AMENDMENT</u>	
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
<u>BENJAMIN FELL</u> <u>511 E. MENOMONEE ST.</u> <u>MILWAUKEE, WIS. 53202</u>	<u>ADDITION</u> <u>PREVIOUSLY OMITTED</u> Occupation	<u>1976</u>	<u>100.00</u>
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ <u>100.00</u>		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
<u>SAME AS ABOVE</u>	<u>ADDITION</u> <u>PREVIOUSLY OMITTED</u> Occupation	<u>1976</u>	<u>50.00</u>
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ <u>150.00</u>		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
<u>MR. MARTIN HANSON</u> <u>BOX 767</u> <u>MELTON, WIS. 54546</u>	<u>ADDITION</u> <u>PREVIOUSLY OMITTED</u> Occupation	<u>1976</u>	<u>225.00</u>
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ <u>505.00</u>		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
<u>SAME AS ABOVE</u>	<u>ADDITION</u> <u>PREVIOUSLY OMITTED</u> Occupation	<u>1976</u>	<u>75.00</u>
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ <u>580.00</u>		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
<u>SAME AS ABOVE</u>	<u>ADDITION</u> <u>PREVIOUSLY OMITTED</u> Occupation	<u>1976</u>	<u>75.00</u>
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ <u>655.00</u>		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
<u>MS. BERNEUA HEBB</u> <u>80 SOUTH RANDALL</u> <u>JAMESVILLE, WIS. 53545</u>	<u>ADDITION</u> <u>PREVIOUSLY OMITTED</u> Occupation	<u>1976</u>	<u>20.00</u>
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ <u>300.00</u>		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
<u>MS. JANE S. HOWELL</u> <u>3912 PLYMOUTH CIRCLE</u> <u>MADISON, WIS. 53705</u>	<u>ALTERNATIVE MONTHLY REPORT</u> <u>3/1/76 - 3/31/76</u> <u>ADDITION</u> <u>PREVIOUSLY OMITTED</u> Occupation	<u>3/76</u>	<u>144.00</u>
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ <u>144.00</u>		
SUBTOTAL of receipts this page (optional)			\$ <u>689.00</u>
TOTAL this period (last page this line number only)			\$

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

(Use Separate Schedules for
 each numbered line)

82040323702

Name of Candidate or Committee in Full			
WISCONSIN LOCAL '76 COMMITTEE		<u>Amendment</u>	
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
MS. JANE S. HOWELL 3912 PLYMOUTH CIRCLE MADISON, WIS. 53705	ALTERNATIVE MONTHLY REPORT 3/1/76 - 3/31/76 ADDITION PREVIOUSLY OMITTED Occupation	3/76	10.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date . . . \$ 154.00		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
SAME AS ABOVE	SAME AS ABOVE ADDITION PREVIOUSLY OMITTED Occupation	3/76	10.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date . . . \$ 164.00		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
MS. MELBAINE S. LANE 7721 NORTH LAKE DRIVE MILWAUKEE, WIS. 53217	ADDITION PREVIOUSLY OMITTED Occupation	1976	100.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date . . . \$ 150.00		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
ELIZABETH A. LEWIS 2809 COLUMBIA ROAD MADISON, WIS.	ADDITION PREVIOUSLY OMITTED Occupation	1976	15.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date . . . \$ 115.00		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
SAME AS ABOVE	JANUARY 31 REPORT ADDITION PREVIOUSLY OMITTED Occupation	10/10/76	10.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date . . . \$ 186.00		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
SAME AS ABOVE	ADDITION PREVIOUSLY OMITTED Occupation	1976	25.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date . . . \$ 161.00		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
ROBERT MADISON 189 BLACKWOOD LANE STAMFORD, CONN. 06903	ALTERNATIVE MONTHLY REPORT 3/1/76 - 3/31/76 ADDITION PREVIOUSLY OMITTED Occupation	3/15/76	50.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date . . . \$ 150.00		
SUBTOTAL of receipts this page (optional)			\$ 220.00
TOTAL this period (last page this line number only)			\$

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

(Use Separate Schedules for
 each numbered line)

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Name of Candidate or Committee in Full			
WISCONSIN UDALL '76 COMMITTEE		AMENDMENT	
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
CLIFFORD MESSINGER 12925 COLONY DRIVE MEEVAN, WIS. 53092	ALTERNATIVE MONTHLY REPORT 2/1/76 - 2/29/76 ADDITION PREVIOUSLY OMITTED Occupation	2/14/76	200.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 200.00		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
MARGARIE MILLER 1937 ARLINGTON PLACE MADISON, WIS. 53705	SAME AS ABOVE ADDITION PREVIOUSLY OMITTED Occupation	2/11/76	50.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 110.00		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
MARY L. MUNTZ 6102 HAMMERSTAY ROAD MADISON, WIS. 53711	ALTERNATIVE MONTHLY REPORT 3/1/76 - 3/31/76 ADDITION PREVIOUSLY OMITTED Occupation	3/76	50.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 107.50		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
FRANK NIKOLAY ABBOTSFORD, WIS. 54405	SAME AS ABOVE ADDITION PREVIOUSLY OMITTED Occupation	3/76	100.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 100.00		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
JOHN O'DONWELL 3104 W. AMERICAN DR. GREENFIELD, WIS. 53221	SAME AS ABOVE ADDITION PREVIOUSLY OMITTED Occupation	3/3/76	25.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 102.50		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
SAME AS ABOVE	SAME AS ABOVE ADDITION PREVIOUSLY OMITTED Occupation	3/15/76	10.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 112.50		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
RICHARD REIGLE 744 SUMMIT DRIVE WESTBEND, WIS. 53095	JANUARY 31 REPORT ADDITION PREVIOUSLY OMITTED Occupation	10/14/76	25.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 200.00		
SUBTOTAL of receipts this page (optional)			\$ 460.00
TOTAL this period (last page this line number only)			\$

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

(Use Separate Schedules for
 each numbered line)

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Name of Candidate or Committee in Full			
WISCONSIN UDALL '76 COMMITTEE		<u>Amendment</u>	
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
EDWARD SHTEN 5710 ARBOR VITAE MADISON, WIS. 53705	<u>JANUARY 31 REPORT</u> <u>ADDITION</u> <u>PREVIOUSLY OMITTED</u> Occupation	10/16/76	20.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 140.00		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
ROBERT SILBERSTEIN 2015 E. MARION STREET MILWAUKEE, WIS. 53211	<u>ALTERNATIVE MONTHLY REPORT</u> <u>4/1/76 - 4/30/76 ADDITION</u> <u>PREVIOUSLY OMITTED</u> Occupation	4/5/76	12.50
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 112.50		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
SUZANNE B. STRINSE BOX 577 MELTON, WIS. 54540	<u>ALTERNATIVE MONTHLY REPORT</u> <u>3/1/76 - 3/31/76 ADDITION</u> <u>PREVIOUSLY OMITTED</u> Occupation	3/5/76	25.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 125.00		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
SARAH WILSON BOX 62A SANTA FE, NEW MEXICO	<u>ALTERNATIVE MONTHLY REPORT</u> <u>4/1/76 - 4/30/76 ADDITION</u> <u>PREVIOUSLY OMITTED</u> Occupation	4/5/76	250.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 250.00		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
ANTHONY WISE HAYWOOD, WIS. 54843	<u>OCTOBER 10 REPORT</u> <u>ADDITION</u> <u>PREVIOUSLY OMITTED</u> Occupation	8/16/76	20.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 120.00		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
M. CRAWFORD YOUNG 639 CRANDALE STREET MADISON, WIS. 53711	<u>ALTERNATIVE MONTHLY REPORT</u> <u>4/1/76 - 4/30/76 ADDITION</u> <u>PREVIOUSLY OMITTED</u> Occupation	4/6/76	50.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 130.00		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
	Occupation		
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$		
SUBTOTAL of receipts this page (optional)			\$ 377.50
TOTAL this period (last page this line number only)			\$ 2267.50

ITEMIZED EXPENDITURES
 (Operating, Transfers Out, Contributions in-Kind,
 Loans, Loan Repayments and Refunds Made)
 Supporting Lines 20a, 21a, and 22a, 22b, and 22c
 of FEC FORM 3

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Name of Candidate or Committee in Full			
WISCONSIN UDALL '76 COMMITTEE AMENDMENT			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
CASH ENDORSED BY CHARLES WARD	ALTERNATIVE MONTHLY REPORT 3/1/76 - 3/31/76 ADDITION PREVIOUSLY OMITTED Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	3/25/76	150.00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
CASH ENDORSED BY DAVID LANDAU	SAME AS ABOVE ADDITION PREVIOUSLY OMITTED Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	3/25/76	500.00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
CASH ENDORSED BY DAVID LANDAU	SAME AS ABOVE ADDITION PREVIOUSLY OMITTED Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	3/25/76	520.00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
CASH ENDORSED BY PAUL SULLIVAN	SAME AS ABOVE ADDITION PREVIOUSLY OMITTED Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	3/31/76	3250.00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
SUBTOTAL of expenditures this page (optional).....			\$ 4420.00
TOTAL this period (last page this line number only).....			\$ 4420.00



UDALL FOR PRESIDENT

Office of the National Treasurer

122 East 42 Street, New York, N.Y. 10017 • (212) 697-2233

December 3, 1979

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

Attn: Charles Steele
Acting General Counsel

Re: MUR 993

Dear Mr. Steele:

The Udall '76 Committee is responding to your letter of October 18, 1979, on behalf of the Udall '76 Committee - Arizona. The Udall '76 Committee - Arizona overstated its receipt and expenditure totals by \$15,251.77. We have now accurately amended the reports deleting the appropriate contributions and transfers-out and the Comprehensive Amendment is enclosed herewith.

If you should have any further questions, please contact Mr. Edward Coyle of Congressman Udall's staff, at (202)225-9790.

Sincerely,

Stanley Kurz
STANLEY KURZ
National Treasurer

SK:ejd

cc: Honorable Morris K. Udall
Calvin H. Udall, Chairman
Udall '76 Committee - Arizona
James D. Pembroke, Esq.

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Wisconsin Vol. 176

1-6
6.1.27 RC

Summary of Receipt Transactions (with)
Fund Reports.

Name	Address street	City	State
Irvin I. Arrod Maryann M. Balsman	925 E. Wells 721 30th Ave.	Milwaukee Milwaukee	WI Wis.
Ms. Kathleen Carlson	1209 North 4th St.	Milwaukee	53208
Gerald E. Colburn Benjamin Rose	200 West Inwood Park 511 Kamenomental St.	Milwaukee Milwaukee	53217 53202
Ms. Arlene Warkoff Ms. Marjorie Hanson	Cox 767	Mellon Mellon	WI 54154 WI 54116
Ms. Camille Johnson Ms. Bernice Hahn	1435 9th St. W. 80 South Randall	Waukegan, Ill. Schenquo	20024 53515
Ms. Joan S. Johnson	3910 Plymouth Cir.	Madison	53705
Ms. Helaine Solare Ms. Mary E. Leschner	7721 North Lake Dr. 1621 Capital Ave.	Milwaukee Madison	WI 53217 53705
Elizabeth A. Lewis	2805 Columbia Rd.	Madison	
Robert Madison	189 Blackwood Lane	Stanford, Conn.	06903
Clifford Messinger	12925 Colony Drive	Madison	53712
Robert L. Metzger Sr., Jr.	2802 Kellogg Rd.	Madison	53705
Ms. Ronald Miller	1937 Arlington Pl.	Madison	53705
Mary L. Muntz	6102 Hammerstry Rd.	Madison	53711
Frank Mikalay		Madison	54445

- 01200 - Receipts Records of Committee

PURPOSE: See title

8 2 0 4 0 3 2 3 7 8
WISCONSIN VDALE '76

29 / -
6/27/76

Summary of Receipt Transactions not
four reported

Name	Address		City	Zip State
	Street			
John O'Donnell	3104 Wis	American Dr.	Greenfield	53221
Richard C Reagle	7944 Summit	DR	West Bend	53095
Edward Schlar	5714 ARBOR	Village	Madison	53705
Edwin Silverstein	2015 E. Marquette	St.	Milwaukee	53211
John S. Szwed	Box 577		Mellon	54546
Elizabeth B. St. Pierre	Box 577		Mellon	54546
Paul Wilson	Box 62A		Santa Fe	NM 87501
Anthony WISE			Hayward	WI 54843
Raymond Young	639 Grandale	St.	Madison	53711
Wilson	4450 Oakland		Milwaukee, WI	53211

10	11	12	13	14
Amount.	Angular Yr. in class	Total contributions	Remarks.	
150	150	250		
✓ 25	10750	10750	Passbook on National Register.	
✓ 17	11750	11750		
✓ 27	13750	13750		
✓ 10	14750	14750		
✓ 2	15250	15250		
✓ 17	16250	16250		
✓ 17	17250	17250		
✓ 3	17750	17750		
✓ 10	18750	18750		
30	104	44650		
20	124	46650		
1	125	46750		
50	9950	165	date of 1900-1900	
15	11450	180		
250	250	46239		
100	100	100		
50	150	150		
✓ 25	125	125		
✓ 200	205	615		
225	505	915		
75	580	990		
75	780	690	IN Kind 133	
✓ 70	120	120		
20	200	34780		
100	141	151		
10	151	164		
10	161	174		
100	150	150		
✓ 20	171	171		
✓ 35	146	146		
75	115	115		
10	186	186		
25	161	161		
50	150	150		
200	200	575		
✓ 100	110	110		
50	120	120		
50	10750	12625		
100	100	131		

Natl:
 R. H. White Co. Mem
 was found Register.

Date of Receipt	Amount	Aggregate year to date	Total Contributions
11/5/75 ✓	25 -	105	105 ✓
12/22 ✓	15 -	120	120 ✓
3/3/76	25	102.50	220.50
3/19/76	10	112.50	230.50
4/14/76	25	200	
11/14/76	20	140	140
11/5/76	12.5	112.50	112.50
2/11/77 ✓	20	120	20
3/5/77	25	125	175
4/5/77	25	250	250
8/16/77	20	120	120
4/1/78	50	130	130
12/10/78 ✓	600	1020 -	1020 ✓

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**REPORT OF RECEIPTS AND EXPENDITURES
 FOR A CANDIDATE OR COMMITTEE
 SUPPORTING CANDIDATE(S) FOR
 NOMINATION OR ELECTION TO FEDERAL OFFICE**

(Except for Candidates or Committees Receiving Federal Matching Funds)

Note: Committees authorized by a candidate to receive contributions and make expenditures in connection with more than one election must maintain separate records with respect to each election.

1 WALL '76 COMMITTEE - ARIZONA 2 I.D. No. C00033474
 Name of Candidate or Committee (in full) Candidates/Committee
40 WALL '76 COMMITTEE, 122 EAST 42 ST. 3 PRESIDENCY
 Address (number and street) Office Sought, State/District (if applicable)
NEW YORK, NEW YORK 10017
 City, State and ZIP Code Check if address is different than previously reported. Year of Election 1976

4 Type of Report (check appropriate boxes)

April 10 Quarterly Report Tenth day report preceding _____ election (primary, general or convention) Termination Report

July 10 Quarterly Report on _____ in the State of _____ Amendment for: 1976 (which report)

October 10 Quarterly Report Thirtieth day report following _____ election (primary, general or convention)

January 31 Annual Report

Monthly Report _____ on _____ in the State of _____ (month) (date)

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 This Period	Column B Calendar Year-To-Date
<u>1/1/76</u> Through <u>12/31/76</u>		
6 Cash on hand January 1, 19 <u>COMPREHENSIVE ADJUSTMENT - ADJUSTMENTS</u>		\$ <u>NONE</u>
7 Cash on hand at beginning of reporting period <u>(AS REPORTED 12/31/76)</u>	\$ <u>261.10</u>	
8 Total receipts (from line 19)	\$ <u>0</u>	\$ <u>59,463.90</u>
(a) Subtotal (Add lines 7 and 8 for Column A and lines 6 and 8 for Column B)	\$ <u>261.10</u>	\$ <u>59,463.90</u>
9 Total expenditures (from line 25)	\$ <u>(15,251.77)</u>	\$ <u>43,951.03</u>
10 Cash on hand at close of reporting period (Subtract line 9 from line 8a)	\$ <u>15,512.93</u>	\$ <u>15,512.93</u>
11 Value of contributed items on hand to be liquidated (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.

11/16/79
 (Date)

STANLEY KURTZ, TREASURER
 (Typed Name of Treasurer or Candidate)

Stanley Kurtz
 (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 437j, or Section 441; (see reverse side of form).

For further information, Contact:

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

or call 800/424-9530

Approved by GAO
 B-187620 (R0506)
 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.

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DETAILED SUMMARY OF RECEIPTS AND EXPENDITURES
(Page 2, FEC FORM 3)

NAME OF CANDIDATE OR COMMITTEE	REPORT COVERING THE PERIOD	
WDAU '76 COMMITTEE - ARIZONA	FROM: 1/1/76	TO: 12/31/76
RECEIPTS	Column A This Period	Column B Calendar Year-To-Date
COMPREHENSIVE AMENDMENTS - ADJUSTMENTS		
14. Contributions from individuals (including contributions in-kind):		
(a) Itemized (use Schedule A)	\$ 0	
(b) Unitemized	\$ 0	
(c) Sales and collections included above:		
List by event on memo Schedule D (\$ _____)		
(d) Subtotal of contributions from individuals	\$	\$ 36,350.52
15. Transfers from Political Committees:		
(a) Funds from affiliated/authorized committee (itemize on Schedule A regardless of amount)	\$ 0	
(b) Funds from other committees (itemize on Schedule A regardless of amount)	\$ 0	
(c) Contributions in-kind from political committees (itemize on Schedule A regardless of amount)	\$ 0	
(d) Subtotal of transfers in and contributions in-kind from political committees	\$	\$ 20,991.00
16. Other Income:		
(a) Itemized (use Schedule A)	\$ 0	
(b) Unitemized	\$ 0	
(c) Subtotal of other income	\$	\$
17. Loans and Loan Repayments Received:		
(a) Itemized (use Schedule A)	\$ 0	
(b) Unitemized	\$ 0	
(c) Subtotal of loans and loan repayments received	\$	\$ 900.00
18. Refunds, Rebates, Returns of Deposits:		
(a) Itemized (use Schedule A)	\$ 0	
(b) Unitemized	\$ 0	
(c) Subtotal of refunds, rebates, returns of deposits	\$	\$ 1,222.44
19. Total Receipts	\$ 0	\$ 59,463.96
EXPENDITURES		
20. Operating Expenditures:		
(a) Itemized (use Schedule B)	\$ 0	
(b) Unitemized	\$ 0	
(c) Subtotal of operating expenditures	\$	\$ 30,400.92
Loans, Loan Repayments, and Contribution Refunds Made:		
(a) Itemized (use Schedule B)	\$ 0	
(b) Unitemized	\$ 0	
(c) Subtotal of loans and loan repayments made and contribution refunds	\$	\$ 5.00
Transfers Out to Political Committees:		
(a) To affiliated/authorized committee (itemize on Schedule B regardless of amount)	\$ (15,251.77)	
(b) To other committees (itemize on Schedule B regardless of amount)	\$ 0	
(c) Contributions in-kind to other committees (itemize on Schedule B regardless of amount)	\$ 0	
(d) Subtotal of transfers out	\$ 0	\$ 13,545.11
23. Independent Expenditures (use Schedule E)	\$ 0	\$
24. Coordinated Expenditures Made by Political Committees (2 U.S.C. 441(d)) (itemize on Schedule F)	\$ 0	\$
25. Total Expenditures	\$ (15,251.77)	\$ 43,951.03
RECEIPTS AND EXPENDITURES, NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES		
26. Total Receipts (from line 19)	\$ 0	
27. Transfers In (from line 15(a))	\$ 0	
28. Net Receipts (Subtract line 27 from line 26)	\$ 0	
29. Total Expenditures (from line 25)	\$ (15,251.77)	
30. Transfers Out (from line 22(a))	\$ (15,251.77)	
31. Net Expenditures (Subtract line 30 from line 29)	\$ 0	

ITEMIZED EXPENDITURES
 (Operating, Transfers Out, Contributions In-Kind,
 Loans, Loan Repayments and Refunds Made)
 Supporting Lines 20a, 21a, and 22a, 22b, and 22c
 of FEC FORM 3

(Use Separate Schedules for
 each numbered line)

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Name of Candidate or Committee in Full WALL '76 COMMITTEE - ARIZONA AMENDMENT			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
JOHN SHERMAN WALL '76 COMMITTEE 401 C STREET, N.E. WASHINGTON, D.C. 20002	ALTERNATIVE MONTHLY REPORT 1/76 - 2/29/76 DELETION APPROVED BY NAT'L. COMM. Expenditure for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
SAME	CHECKS MAILED: REPORT #12 PHOENIX DELETION AS ABOVE Expenditure for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	2/4/76	(\$ 4,342.13)
SAME	# 13 PHOENIX DELETION AS ABOVE Expenditure for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	2/6/76	(1,210.00)
SAME	# 14 PHOENIX DELETION AS ABOVE Expenditure for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	2/9/76	(1,110.00)
SAME	# 16 PHOENIX DELETION AS ABOVE Expenditure for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	2/25/76	(777.11)
SAME	CHECKS MAILED: TUCSON DELETION AS ABOVE Expenditure for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	2/4/76	(145.50)
SAME	TUCSON #1 DELETION AS ABOVE Expenditure for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	2/76	(381.00)
SAME	TUCSON #2 DELETION AS ABOVE Expenditure for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	2/26/76	(65.00)
SUBTOTAL of expenditures this page (optional)			\$ (8030.74)
TOTAL this period (last page this line number only)			\$

ITEMIZED EXPENDITURES
 (Operating, Transfers Out, Contributions In-Kind,
 Loans, Loan Repayments and Refunds Made)
 Supporting Lines 20a, 21a, and 22a, 22b, and 22c
 of FEC FORM 3

(Use Separate Schedules for
 each numbered line)

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Name of Candidate or Committee in Full WALL '76 COMMITTEE - ARIZONA AMENDMENT			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
JOHN SHERMAN WALL '76 COMMITTEE 401 C STREET, N.E. WASHINGTON, D.C. 20002	ALTERNATIVE MONTHLY REPORT 2/1/76 - 2/29/76 DELETION REPORTED BY NAT'L COMM. Expenditure for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
SAME	CHECKS MAILED: TUCSON #3 DELETION AS ABOVE Expenditure for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	2/26/76	(107.00)
JOHN SHERMAN WALL '76 COMM. HEADQUARTERS 401 C STREET, N.E. WASHINGTON, D.C. 20002	ALTERNATIVE MONTHLY REPORT 3/1/76 - 3/31/76 DELETION REPORTED BY NAT'L COMM. Expenditure for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
SAME	CONTRIBUTION CHECKS MAILED: PHOENIX REPORT #17 DELETION AS ABOVE Expenditure for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	3/3/76	(680.00)
SAME	PHOENIX REPORT #18 DELETION AS ABOVE Expenditure for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	3/4/76	(235.00)
SAME	PHOENIX REPORT #19 DELETION AS ABOVE Expenditure for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	3/8/76	(335.00)
SAME	TUCSON REPORT #4 DELETION AS ABOVE Expenditure for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	3/8/76	(364.00)
SAME	TUCSON REPORT #5 DELETION AS ABOVE Expenditure for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	3/12/76	(1,364.58)
SUBTOTAL of expenditures this page (optional)			\$ (3085.58)
TOTAL this period (last page this line number only)			\$

ITEMIZED EXPENDITURES

(Operating, Transfers Out, Contributions In-Kind,
 Loans, Loan Repayments and Refunds Made)
 Supporting Lines 20a, 21a, and 22a, 22b, and 22c
 of FEC FORM 3

(Use Separate Schedules for
 each numbered line)

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Name of Candidate or Committee in Full			
WLOALL '76 COMMITTEE - ARIZONA AMENDMENT			
Full Name, Mailing Address and ZIP Code MARK KAMINSKY WLOALL '76 CAMPAIGN HEADQUARTERS 401 C STREET, N.E. WASHINGTON, D.C. 20002	Particulars of Expenditure ALTERNATING MONTHLY REPORT 3/1/76 - 3/31/76 DELETION REPEATED BY NATY COMM. Expenditure for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code SAME	Particulars of Expenditure CONTRIBUTION CHECKS MADE: DELETION AS ABOVE PHOENIX REPORT #20 Expenditure for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year) 3/17/76	Amount of each expenditure this period (807.00)
Full Name, Mailing Address and ZIP Code SAME	Particulars of Expenditure PHOENIX REPORT #21 DELETION AS ABOVE Expenditure for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year) 3/24/76	Amount of each expenditure this period (728.00)
Full Name, Mailing Address and ZIP Code SAME	Particulars of Expenditure PHOENIX REPORT #22 DELETION AS ABOVE Expenditure for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year) 3/25/76	Amount of each expenditure this period (283.45)
Full Name, Mailing Address and ZIP Code SAME	Particulars of Expenditure PHOENIX REPORT #23 DELETION AS ABOVE Expenditure for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year) 3/30/76	Amount of each expenditure this period (705.00)
Full Name, Mailing Address and ZIP Code SAME	Particulars of Expenditure PHOENIX REPORT #24 DELETION AS ABOVE Expenditure for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year) 3/31/76	Amount of each expenditure this period (260.00)
Full Name, Mailing Address and ZIP Code SAME	Particulars of Expenditure TUCSON REPORT #6 DELETION AS ABOVE Expenditure for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year) 3/25/76	Amount of each expenditure this period (305.00)
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period
SUBTOTAL of expenditures this page (optional)			\$ (3088.45)
TOTAL this period (last page this line number only)			\$

ITEMIZED EXPENDITURES
 (Operating, Transfers Out, Contributions In-Kind,
 Loans, Loan Repayments and Refunds Made)
 Supporting Lines 20a, 21a, and 22a, 22b, and 22c
 of FEC FORM 3

(Use Separate Schedules for
 each numbered line)

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Name of Candidate or Committee in Full			
UDALL '76 COMMITTEE - ARIZONA ATTENDMENT			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
MARK KATINSKY UDALL '76 CAMPAIGN HEADQUARTERS 401 C STREET, N.E. WASHINGTON, D.C. 20002	ALTERNATIVE MONTHLY REPORT 4/1/76 - 4/30/76 DELETION REPORTED BY NATL. COMM. Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
SAME	CONTRIBUTION CHECKS MADE: TUCSON REPORT # 7 DELETION AS ABOVE Expenditure for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	4/7/76	(932.00)
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
SAME	PHOENIX REPORT # 25 DELETION AS ABOVE Expenditure for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	4/7/76	(115.00)
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
SUBTOTAL of expenditures this page (options 1)			\$ (1047.00)
TOTAL this period (last page this line number only)			\$ (15,251.77)

Erik Mark Brown
4221 Osage Avenue
Philadelphia, Pennsylvania 19104



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RETURN RECEIPT
REQUESTED

85:1 ...

CERTIFIED
No. 806636
MAIL

62.

William C. Oldaker
General Counsel
Federal Election Commission
Washington, D. C. 20463

GC# 11612

RECEIVED
FEDERAL ELECTION
MURKIN COMMISSION

Erik Mark Brown
4221 Osage Avenue
Philadelphia, Pennsylvania 19104

'79 NOV 13 PM 1:58

November 1, 1979

William C. Oldaker
General Counsel
Federal Election Commission
Washington, D.C. 20463

014958

Dear Mr. Oldaker:

I spoke with Ed Coyle in Congressman Udall's office on Oct. 25, 1979 regarding this matter. He assures me that it is being handled by the national Udall '76 Committee. Based on that assurance, I am relying on the National Treasurer to respond directly to your concerns.

I have in the past and continue to cooperate in this matter. However, I believe that the possible violations you have identified occurred prior to my assumption of the Treasurer, Pennsylvania Udall '76 Committee position.

I spoke with Frances B. Hagan of your staff today as you suggested. She suggested I write you this letter.

Very truly yours,

Erik Mark Brown

Erik Mark Brown
Treasurer
Pennsylvania Udall '76 Committee

cc: Honorable Morris K. Udall
Robert J. Mulligan, Jr., Chairman
Pennsylvania Udall '76 Committee

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EC 11592

RECEIVED
FEDERAL ELECTION
COMMISSION

36 East 64th Street
New York, N.Y. 10021/3 AM 9:35
November 7, 1979

Mr. Charles Steele
Acting General Counsel
Federal Election Commission
Washington, D.C. 20463

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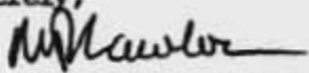
Dear Mr. Steele:

Please be advised that Mr. Stanley Kurz, Treasurer of the national Udall '76 Committee, will be responding to the alleged Federal Election Commission violations cited in Mr. William Oldaker's October 18, 1979 letter (ref: MUR 993) to me as Treasurer of the New York State Udall campaign committee.

The New York Udall '76 Committee was terminated on August 31, 1976 and transferred all its books and records to the national committee. Mr. Kurz and his staff have subsequently coordinated all accounting, audit, legal and regulatory work with the FEC. This is a responsibility that they have agreed to continue.

With respect to the specific violations cited in Mr. Oldaker's letter to me, I understand that they may be resolved by simply amending the Udall's '76 Committee final report. The allegations are therefore not a matter of violating the spirit of the Federal Election Campaign Act, but are strictly a matter of completing the New York Committee's record of disclosure. The national committee will therefore amend the New York Committee report with the names and addresses of the 21 contributors who were not fully identified in the New York Committee's financial reports. The in-kind contribution of \$900 will be treated similarly—an amendment submitted on behalf of the New York Committee by Mr. Kurz and his national committee staff.

As the alleged violations are minor in character and simply a matter of amending the record, I would very much appreciate your indulgence. Without the New York Committee's records on hand, it is impossible to expedite the matter personally. I will therefore try to work through the Udall National Committee so as to complete the New York State Committee records in full compliance with the law.

Sincerely,

Matthew P. Lawlor, Treasurer
New York Udall '76 Committee

CC: Honorable Morris K. Udall
Mr. Stanley Kurz, Treas., Udall '76 Committee
Frances B. Hagin, Staff Member, Federal Elections Commission

92040323719

36 East 64th Street
New York, N. Y. 10021
November 7, 1979

Mr. Charles Steele
Acting General Counsel
Federal Election Commission
Washington, D.C. 20463

Dear Mr. Steele:

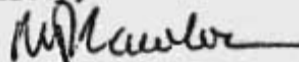
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Sincerely,



Matthew P. Lawlor, Treasurer
New York Udall '76 Committee

CC: Honorable Morris K. Udall
Mr. Stanley Kurz, Treas., Udall '76 Committee
Frances B. Hagin, Staff Member, Federal Elections Commission

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WORLDWIDE AIR FREIGHTCO.
INC.

DOMESTIC AND INTERNATIONAL AIR FREIGHT FORWARDERS

EXECUTIVE OFFICES

581 WEST 58TH ST. • NEW YORK, N. Y. 10010

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<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

ORIG. STATION

WORLDWIDE AIRBILL NO.
LAX 001127V

PREPAID	COLLECT	OTHER
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B.A.F. ACCOUNT NO.

D.C.

CHARGES

FROM (SHIPPER) Sumner Fallon-McKnight	TO (CONSIGNEE) Federal Election Commission	DATE 11/12/79
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ADDRESS Trail & Macella	ADDRESS 1325 K Street, N.W.	COMMODITY NO.
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CITY Los Angeles, Calif. STATE CA ZIP 90067	CITY Washington, D.C. STATE D.C. ZIP 20481	WEIGHT RATE
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AUTHORIZED BY: Sumner Fallon-McKnight	SHIPPER'S NO.	ATTENTION TO: Mr. Marshall Gantner	DECLARED VALUE	CHARGES
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NAME: Sumner Fallon-McKnight	DECLARED VALUE: \$	EXCESS VALUE CHARGES
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PIECES	DESCRIPTION AND MARKS	WEIGHT	ROUTING	PICK UP
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SIGNATURE REC. AGENT	DATE	TIME	RECEIVED IN GOOD ORDER EXCEPT AS NOTED	DATE	TIME	CUBIC WEIGHT	SHIPPER'S C.O.D. FEE
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			A.R. P.M.	CONSIGNEE SIGNATURE Sam Kider			TOTAL CHARGES
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CONSIGNEE'S COPY							PAYMENT REQUIRED WITHIN 15 DAYS.
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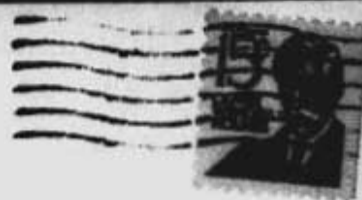
M. P. Lawlor
36 East 64th St.
New York, N. Y. 10021



Frances B. Hagin
Staff Member
Federal Election Commission
Washington, D. C. 20463

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M. P. Lawlor
36 East 64th St.
New York, N. Y. 10021



Mr. Charles Steele
Acting General Counsel
Federal Election Commission
Washington, D.C. 20463

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DANE & GREENBERG
ATTORNEYS AT LAW
P. O. BOX 840
91 MAIN STREET
CONCORD, MASSACHUSETTS 01742
AREA CODE 617 EM 6-8333

CARE ADDRESS: DANELAW

October 31, 1979

Ms. Frances B. Hagan
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: MUR 993

Dear Ms. Hagan:

This is in response to Mr. Oldaker's letter dated October 18, 1979 concerning the organization of the Udall '76 Massachusetts Special Events Committee (the "Committee"). In particular, you indicate that the Committee may have failed to file written authorization of the candidate as required by the applicable laws and regulations in effect at the time. You will understand that the events in question occurred almost five years ago, and reconstructing them may be difficult. I have however reviewed my files, and provide the following information which I hope will assist you in resolving the question which Mr. Oldaker has raised.

1. Organization. The Committee enjoyed only a brief existence. The Committee's Registration Form and Statement of Organization (Comp. Gen. Election Form 1) was mailed to the Federal Election Commission (the "Commission") by certified mail on January 22, 1975. A report was filed on March 10, 1975 and a Termination Report was mailed by certified mail on July 3, 1975. Copies of these statements and reports are attached as Exhibit A. These were acknowledged by a letter of Gordon Andrew McKay, Assistant Staff Director for Disclosure and Compliance dated July 24, 1975, and FEC Form 15 dated January 15, 1976 (Exhibit B). The termination of the Committee in July 1975 was recognized by letter of Patricia Schering, Chief, Reports Examining Section, dated

80 : E d S 100 6/

RECEIVED
GENERAL COUNSEL

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Ms. Frances B. Hagan
Federal Election Commission
October 31, 1979
Page 2

March 2, 1976 (Exhibit C), and by FEC Form 1601 dated December 3, 1975 (Exhibit D).

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2. Consent. My records do not indicate whether Congressman Morris K. Udall ever filed a written authorization for the Committee with the Commission or the Office of the Comptroller General. It is however clear that the Committee was in fact acting with his knowledge and authority. My records show telephone communications with Congressman Udall's office in January 1975 prior to the organization of the Committee. In particular, I spoke to Mr. John Gabusi in Congressman Udall's office on January 13, 1975, and my notes show that he set forth the reasons for forming the Committee and the limitations to be placed on it. Copies of reports filed with the Commission were routinely sent to Congressman Udall's office and to his principal campaign committee (The Udall '76 Committee), (Exhibits E and F), and when the Committee was closed down, all remaining funds were forwarded to the Udall '76 Committee (Exhibit F. See also the Committee's Termination Report, Schedule D, which shows a "transfer of funds to principal campaign committee" of \$1467.66 on May 23, 1975). Congressman Udall personally appeared at events organized by the Committee, which included a cocktail party and reception held on February 1, 1975, in Boston. (Exhibit G).

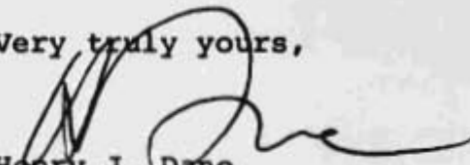
3. Applicable Law and Regulations. Neither the Federal Election Campaign Act of 1971 nor the Federal Election Campaign Act Amendments of 1974 required a political committee to obtain the written authorization of a candidate that it sponsored. To the extent that such an obligation exists, it arises under the Regulations of the Commissions. Regulations were not promulgated by the Commission until after the termination of the Committee. The first reference that I find to the authorization requirement is in §103.7 of the Proposed Rules of the Federal Election Commission published at page 44703 in Volume 40 of the Federal Register, September 29, 1975 (Exhibit H), almost three months after the Committee was terminated. FEC Form 2a, "Candidate Authorization of a Political Committee other than a Principal Campaign

Ms. Frances B. Hagan
Federal Election Commission
October 31, 1979
Page 3

Committee" was published at page 57954 in Volume 40 of the Federal Register, December 12, 1975 (Exhibit I). I do not find regulation §102.12(a)(1) referred to in Mr. Oldaker's letter in the Federal Register until August 25, 1976 (Volume 41, No. 166, p. 35940), over a year after the Committee was dissolved.

4. Conclusion. The Committee was in existence only for the first half of 1975. During that period, the Federal Election Commission was being organized. The governing statutes did not require candidates to file written authorization of their political committees, and no regulations had yet been adopted. During this period of transition, the Committee made its best efforts not only to comply with the law, but also to follow the best available advice. We do not believe that at that time the written authorization of the candidate was required, but in the event that the Committee failed to comply with such a requirement, it was through justifiable oversight, and not through any intention to evade the requirements of the Commission or to prejudice the public interest. If such a written consent were a fundamental requirement of organization during the period in question, it is curious that the matter had not been brought to our attention earlier. During and after the period of the Committee's existence, we received several inquiries from the Commission concerning reports filed by the Committee. Had we at any time received a request from the Commission to provide them with the written consent of Congressman Udall, we would have done so immediately.

Very truly yours,


Henry J. Dane
Treasurer
Udall '76 Massachusetts
Special Events Committee

cc: Hon. Morris K. Udall
Stanley Kurz, Esq.,
Treasurer, Udall '76 Committee
Sen. Chester G. Atkins

CERTIFIED MAIL NO. 612688

82040323726

EXHIBIT A

82040323727

EXHIBIT A

1. Registration Form and Statement of Organization (Comp. Gen. Election Form 1) dated January 17, 1975.
2. Report of Receipts and Expenditures (Comp. Gen. Election Form 3) dated March 7, 1975.
3. Report of Receipts and Expenditures (Comp. Gen. Election Form 3) dated July 3, 1975 "Termination Report".

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SENDER: Be sure to follow instructions on other side

PLEASE FURNISH SERVICE(S) INDICATED BY CHECKED BLOCK(S)
(Additional charges required for these services)

Show to whom, date and address where delivered Deliver ONLY to addressee

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Received the numbered article described below

REGISTERED NO.	SIGNATURE OR NAME OF ADDRESSEE (Must always be filled in)
CERTIFIED NO. 339647	OFFICE OF FEDERAL ELECTIONS U.S. General Accounting Office 441 G Street NW Room: 3538
INSURED NO.	SIGNATURE OF ADDRESSEE'S AGENT (If required, and please print name)
DATE DELIVERED	SHOW WHERE DELIVERED (Only if requested, and please print name)

RECEIPT FOR CERTIFIED MAIL—30¢ (plus postage)

SENT TO	Office of Federal Elections	POSTPAID OR DATE
STREET ADDRESS	General Accounting Office 441 G Street NW	
P.O. STATE AND ZIP CODE	Washington, D. C. 29548	
OPTIONAL SERVICES FOR ADDITIONAL FEES		
RETURN RECEIPT SERVICES	1. Shows to whom and date delivered With delivery to addressee only 2. Shows to whom, date and where delivered With delivery to addressee only	15¢ 65¢ 35¢ 25¢
DELIVER TO ADDRESSEE ONLY		
SPECIAL DELIVERY (extra fee required)		



No. 339647

PS Form 3800 Nov. 1971 NO INSURANCE COVERAGE PROVIDED—NOT FOR INTERNATIONAL MAIL (See other side) * GPO: 1970-207-000

82040323729

COMPTROLLER GENERAL OF THE UNITED STATES

U.S. GENERAL ACCOUNTING OFFICE

Washington, D.C.

REGISTRATION FORM AND STATEMENT OF ORGANIZATION
FOR A
COMMITTEE

SUPPORTING ANY CANDIDATE(S) FOR THE OFFICE OF PRESIDENT OR VICE PRESIDENT
OF THE UNITED STATES AND ANTICIPATING CONTRIBUTIONS OR EXPENDITURES
IN EXCESS OF \$1,000 IN ANY CALENDAR YEAR

REQUIREMENTS FOR REGISTRATION OF POLITICAL COMMITTEES

(In accordance with the provisions of the Federal Election Campaign Act of 1971, P.L. 92-225)

SEE APPROPRIATE SUPERVISORY OFFICER'S MANUAL FOR ADDITIONAL
REGULATIONS AND INSTRUCTIONS

A. The treasurer of each political committee which anticipates receiving contributions or making expenditures during the calendar year in an aggregate amount exceeding \$1,000 any portion of which will be expended for the purpose of influencing the nomination or election of candidates for the office of President or Vice President shall file with the Comptroller General of the United States a Registration Form and Statement of Organization, within 10 days after its organization, or, if later, 10 days after the date on which it has information which causes the committee to anticipate it will receive contributions or make expenditures in excess of \$1,000 any portion of which will be expended for the purpose of influencing the nomination or election of candidates for the office of President or Vice President. Each such committee in existence on April 7, 1972 shall file a Registration Form and Statement of Organization with the Comptroller General on or before April 17, 1972. Note: If the committee also supports a candidate for the U.S. Senate, a similar statement must be filed with the Secretary of the Senate, and if the committee supports a candidate for the U.S. House of Representatives a similar statement must be filed with the Clerk of the House of Representatives.

B. A copy of this statement shall be filed with the Secretary of State (or, if there is no Office of Secretary of State, the equivalent State officer) of the appropriate State.

C. A copy of this statement shall be preserved by the treasurer of the political committee for a period of not less than four (4) years.

D. Any change or correction of information previously submitted in a Registration Form and Statement of Organization shall be reported to the Comptroller General within ten (10) days following the change or correction. Such amendments to the statement shall contain the date, identity of the committee, the changed or corrected information appropriately identified, and shall be verified by the oath or affirmation of the person filing such information, taken before any officer authorized to administer the oaths.

E. Any committee which, after having filed one or more Registration Form and Statement of Organization, disbands or determines it will no longer receive contributions or make expenditures during the calendar year in an aggregate amount exceeding \$1,000 shall so notify the Comptroller General. Such notification shall be verified by the oath or affirmation of the person filing it, taken before any officer authorized to administer the oaths, and such notification shall include a statement as to the disposition of residual funds if the committee is disbanding.

1. Full name of committee: Udall '76 Massachusetts Special Events Committee
Mailing address and ZIP code: P.O. Box 540 (91 Main Street)
Concord, Mass. 01742
Date of this registration: January 17, 1975

2. Affiliated or connected organizations:

Name of affiliated or connected organization	Mailing address and ZIP code	Relationship
Udall '76 Committee	1110 Transamerica Title Building Tuscon, Arizona 85702	Supporting same candidate for Federal Office

*Submit additional information on separate continuation sheets appropriately labeled and attached to this Statement of Organization. Indicate in the appropriate box above when information is continued on separate page(s).

3. Area, Scope and Jurisdiction of the Committee:

- (a) Will this committee operate in more than one State? No
(b) Will it operate on a statewide basis in one State? Yes
(c) Will it primarily support candidates seeking State or local office? No
(d) Will it support a candidate for the office of President or Vice President in an aggregate amount in excess of \$1,000 during the calendar year? Yes

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(Full Name of Committee)

4. (a) If the committee is supporting individual candidates for the office of President or Vice President, list each candidate by name, address, office sought, and party affiliation:

Full names of candidates	Mailing address and ZIP code	State and Congressional District	Party
Morris K. Udall	United States House of Representatives Washington, D.C. 20515	-	Democratic nomination for president

(b) List by name, address, office sought, and party affiliation, any candidate for other Federal office that this committee is supporting:

Full names of candidates	Mailing address and ZIP code	Office sought	Party

(c) List by name, address, office sought, and party affiliation, any candidate for any other public office that this committee is supporting:

Full names of candidates	Mailing address and ZIP code	Office sought	Party

5. If this committee is supporting the entire ticket of a party, give name of party: _____

6. Identify by name, address and position, the committee's custodian of books and accounts:

Full name	Mailing address and ZIP code	Committee title or position
Henry J. Dane	P.O. Box 540, 91 Main Street, Concord, Mass. 01742	Treasurer

7. List by name, address and position, other principal officers of the committee, including officers and members of the finance committee, if any:

Full name	Mailing address and ZIP code	Committee title or position
Chester G. Atkins	State House, Room 413F Beacon St., Boston, MA 02133	Chairman
Henry J. Dane	P.O. Box 540, 91 Main Street, Concord, Mass. 01742	Treasurer

*Submit additional information on separate continuation sheets appropriately labeled and attached to this Statement of Organization. Indicate in the appropriate box above when information is continued on separate page(s).

Phoebe Stern

50 Belknap² St.
Concord, MA 01742

Director of Finance

82040323731

8. Does this committee plan to stay in existence beyond the current calendar year? NO If so how long? _____

9. In the event of dissolution, what disposition will be made of residual funds? will conform to applicable statutes

10. List all banks or other repositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds:

Name of bank, repository, etc.	Mailing address and ZIP code
Harvard Trust Co.	52 Main Street, Concord, MA 01742

11. List all reports required to be filed by this committee with States and local jurisdictions, together with the names, addresses, and positions of the recipients of the reports:

Report title	Dates required to be filed	Name and position of recipient	Mailing address and ZIP code
Summary of Receipts, Expenditures, Disbursements and Liabilities	1/10/76	W. Norman Gleason, Director, Office of Campaign and Political Finance	8 Beacon St. Boston, MA 02108

*Submit additional information on separate continuation sheets appropriately labeled and attached to this Statement of Organization. Indicate in the appropriate box above when information is continued on separate page(s).

State of Massachusetts
County of Middlesex ss.

I, Henry J. Dane, being duly sworn, depose (affirm) and say that the information in this Registration Form and Statement of Organization is complete, true, and correct.
(Full Name of Treasurer of Political Committee)

[Signature]
(Signature of Treasurer of Political Committee)

Subscribed and sworn to (affirmed) before me this 17 day of January, A.D. 19 75.

[Signature]
(Notary Public)
My commission expires Nov. 27, 1981



Return completed form and attachments to:
Office of Federal Elections
U.S. General Accounting Office
441 G Street, NW.
Washington, D.C. 20548

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14) Each political committee... calendar year in an aggregate amount exceeding \$1,000 shall file with the supervisory officer a statement of organization, within ten days after its organization or, if later, ten days after the date on which it has information which causes the committee to anticipate it will receive contributions or make expenditures in excess of \$1,000. Each such committee in existence at the date of enactment of this Act shall file a statement of organization with the supervisory officer at such time as he prescribes.

- (b) The statement of organization shall include—
(1) the name and address of the committee;
(2) the names, addresses, and relationships of affiliated or connected organizations;
(3) the area, scope, or jurisdiction of the committee;
(4) the name, address, and position of the custodian of books and accounts;
(5) the name, address, and position of other principal officers, including officers and members of the finance committee, if any;
(6) the name, address, office sought, and party affiliation of (A) each candidate whom the committee is supporting, and (B) any other individual, if any, whom the committee is supporting for nomination for election, or election, to any public office whatever; or, if the committee is supporting the entire ticket of any party, the name of the party;
(7) a statement whether the committee is a continuing one;
(8) the disposition of residual funds which will be made in the event of dissolution;
(9) a listing of all banks, safety deposit boxes, or other repositories used;
(10) a statement of the reports required to be filed by the committee with State or local officers, and, if so, the names, addresses, and positions of such persons; and
(11) such other information as shall be required by the supervisory officer.

(c) Any change in information previously submitted in a statement of organization shall be reported to the supervisory officer within a ten-day period following the change.
(d) Any committee which, after having filed one or more statements of organization, disbands or determines it will no longer receive contributions or make expenditures during the calendar year in an aggregate amount exceeding \$1,000 shall so notify the supervisory officer.

SEC. 306. (a) A report or statement required by this title to be filed by a treasurer of a political committee, a candidate, or by any other person, shall be verified by the oath or affirmation of the person filing such report or statement, taken before any officer authorized to administer oaths.

(b) A copy of a report or statement shall be preserved by the person filing it for a period of time to be designated by the supervisory officer in a published regulation.

(c) The supervisory officer may, by published regulation of general applicability, relieve any category of political committees of the obligation to comply with Section 304 if such committee (1) primarily supports persons seeking State or local office, and does not substantially support candidates, and (2) does not operate in more than one State or on a statewide basis.

DEFINITIONS FOR USE WITH THIS STATEMENT OF ORGANIZATION REGISTRATION FORM

"address" and "mailing address" mean: building number, street, city, State and ZIP code;

"affiliated or connected organizations" means but is not limited to: (a) an organization which organized the reporting committee primarily for the purpose of influencing the nomination or election of candidates for Federal office; or (b) an organization whose primary purpose is to support the reporting committee; or (c) an organization whose membership is generally similar to that of the reporting committee;

"candidate" means: an individual who seeks nomination for election, or election, to Federal office, whether or not such individual is elected, and, for purposes of this paragraph, an individual shall be deemed to seek nomination for election, or election, if he has (1) taken the action necessary under the law of a State to qualify himself for nomination for election, or election, to Federal office, or (2) received contributions or made expenditures, or has given his consent for any other person to receive contributions or make expenditures, with a view to bringing about his nomination for election, or election, to such office;

"contribution" means: (1) a gift, subscription, loan, advance, or deposit of money or anything of value, made for the purpose of influencing the nomination for election, or election, of any person to Federal office or as a presidential or vice-presidential elector, or for the purpose of influencing the result of a primary held for the selection of delegates to a national nominating convention of a political party or for the expression of a preference for the nomination of persons for election to the office of President, or for the purpose of influencing the election of delegates to a constitutional convention for proposing amendments to the Constitution of the United States; (2) a contract, promise, or agreement, whether or not legally enforceable, to make a contribution for any such purpose; (3) a transfer of funds between political committees; (4) the payment, by any person other than a candidate or political committee, of compensation for the personal services of another person which are rendered to such candidate or committee without charge for any such purpose; and (5) notwithstanding the foregoing meanings of "contribution", the word shall not be construed to include services provided without compensation by individuals volunteering a portion or all of their time on behalf of a candidate or political committee;

"election" means: (1) a general, special, primary, or runoff election, (2) a convention or caucus of a political party held to nominate a candidate, (3) a primary election held for the selection of delegates to a national nominating convention of a political party, (4) a primary election held for the expression of a preference for the nomination of persons for election to the office of President, and (5) the election of delegates to a constitutional convention for proposing amendments to the Constitution of the United States;

"expenditure" means: (1) a purchase, payment, distribution, loan, advance, deposit, or gift of money or anything of value, made for the purpose of influencing the nomination for election, or election, of any person to Federal office, or as a presidential or vice-presidential elector, or for the purpose of influencing the result of a primary held for the selection of delegates to a national nominating convention of a political party or for the expression of a preference for the nomination of persons for election to the office of President, or for the purpose of influencing the election of delegates to a constitutional convention for proposing amendments to the Constitution of the United States; (2) a contract, promise, or agreement, whether or not legally enforceable, to make an expenditure, and (3) a transfer of funds between political committees;

"Federal office" means: the office of President or Vice President of the United States; or of Senator or Representative in, or Delegate or Resident Commissioner to, the Congress of the United States;

"file", "filed", and "filing" mean: delivery to the Comptroller General of the United States, Washington, D.C., by midnight of the prescribed filing date, or deposit as certified air mail, in an established U.S. Post Office, postage prepaid, no later than midnight of the second day next preceding the filing date. Certified mail receipt shall be retained as evidence of mailing. Documents deposited within 500 miles from Washington, D.C. need not be sent by air mail but shall be certified. In the event the mailing deadline falls on a day in which no mail is certified, the next preceding day on which mail is certified shall be deemed the mailing date;

"person" means: an individual, partnership, committee, association, corporation, labor organization, and any other organization or group of persons;

"political committee" means: any committee, association, or organization which accepts contributions or makes expenditures during a calendar year in an aggregate amount exceeding \$1,000;

"State" means: each State of the United States, the District of Columbia, the Commonwealth of Puerto Rico, and any territory or possession of the United States; and

"supervisory officer" means: the Secretary of the Senate with respect to candidates for Senator; the Clerk of the House of Representatives with respect to candidates for Representative in, or Delegate or Resident Commissioner to, the Congress of the United States; and the Comptroller General of the United States in any other case.


82040323733



82040323734

No. 778336

RECEIPT FOR CERTIFIED MAIL—30¢ (plus postage)

SENT TO <i>415 General Account</i>	POSTMARK OR DATE
STREET AND NO. <i>441 8. St.</i>	
P.O., STATE AND ZIP CODE <i>Woburn, Mass. 01897</i>	
OPTIONAL SERVICES FOR ADDITIONAL FEE	
RETURN RECEIPT SERVICES	<input type="checkbox"/> 1. Shows to whom and date delivered <input type="checkbox"/> With delivery to addressee only <input type="checkbox"/> 2. Shows to whom, date and where delivered <input type="checkbox"/> With delivery to addressee only
DELIVER TO ADDRESSEE ONLY	
SPECIAL DELIVERY (extra fee required)	

PS Form 3800 Apr. 1971 NO INSURANCE COVERAGE PROVIDED— (See other side) NOT FOR INTERNATIONAL MAIL • GPO: 1971 O - 600-712

COMPTROLLER GENERAL OF THE UNITED STATES

U.S. GENERAL ACCOUNTING OFFICE

Washington, D.C.

REPORT OF RECEIPTS AND EXPENDITURES FOR A COMMITTEE

SUPPORTING ANY CANDIDATE(S) FOR NOMINATION OR ELECTION TO THE OFFICE OF PRESIDENT OR VICE PRESIDENT OF THE UNITED STATES

UDALL '76 Massachusetts Special

(Full Name of Committee)

Events Committee

Identification Number

91 Main St. P.O. Box 540

(Street)

Concord, Massachusetts 01742

(City, State, ZIP code)

Massachusetts

State (If Primary, Convention, or Caucus)

TYPE OF REPORT

(Check Appropriate Box and Complete, if Applicable)

- March 10 report.
June 10 report.
September 10 report.
January 31 report.
Fifteenth day report preceding election on
Fifth day report preceding election on
Termination report.

VERIFICATION BY OATH OR AFFIRMATION

State of Massachusetts

ss.

County of Middlesex

I, Henry J. Dane, being duly sworn, depose (affirm) and say that this Report of Receipts and Expenditures is complete, true, and correct

(Signature of Treasurer of Committee)

Subscribed and sworn to (affirmed) before me this 7th day of March, A.D. 19 75.

(Notary Public)

My commission expires November 27, 19 81

[SEAL]

RETURN COMPLETED REPORT AND ATTACHMENTS TO: Office of Federal Elections U.S. General Accounting Office 441 G Street, N.W. Washington, D.C. 20548

92040323735

SUMMARY REPORT COVERING PERIOD FROM January 24, 1975 THRU February 28, 1975

3
2
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3
2
3
7
3
6

	Column 4— This period	Column 5— Calendar year to date
SECTION A—RECEIPTS:		
Part 1. Individual contributions:		
a. Itemized (use schedule A*)	\$ 350.00	
b. Unitemized	\$ 555.00	
Total individual contributions	\$ 905.00	\$ 905.00
Part 2. Sales and collections:		
Itemize (use schedule B*)	\$ 2146.00	\$ 2146.00
Part 3. Loans received:		
a. Itemized (use schedule A*)	\$ 800.00	
b. Unitemized	\$ NONE	
Total loans received	\$ 800.00	\$ 800.00
Part 4. Other receipts (refunds, rebates, interest, etc.):		
a. Itemized (use schedule A*)	\$ NONE	
b. Unitemized	\$ NONE	
Total other receipts	\$ NONE	\$ NONE
Part 5. Transfers in:		
Itemize all (use schedule A*)	\$ NONE	\$ NONE
TOTAL RECEIPTS	\$ 3851.00	\$ 3851.00
SECTION B—EXPENDITURES:		
Part 6. Communications media expenditures:		
Itemize all (use schedule C*)	\$ NONE	\$ NONE
Part 7. Expenditures for personal services, salaries, and reimbursed expenses:		
a. Itemized (use schedule D*)	\$ 185.29	
b. Unitemized	\$ 111.10	
Total expenditures for personal services, salaries, and reimbursed expenses	\$ 296.39	\$ 296.39
Part 8. Loans made:		
a. Itemized (use schedule D*)	\$ 141.00	
b. Unitemized	\$ NONE	
Total loans made	\$ 141.00	\$ 141.00
Part 9. Other expenditures:		
a. Itemized (use schedule C*)	\$ 1683.99	
b. Unitemized	\$ 254.61	
Total other expenditures	\$ 1938.60	\$ 1938.60
Part 10. Transfers out:		
Itemize all (use schedule D*)	\$ NONE	\$ NONE
TOTAL EXPENDITURES	\$ 2375.99	\$ 2375.99
SECTION C—CASH BALANCES:		
Cash on hand at beginning of reporting period	\$ NONE	
Add total receipts (section A above)	\$ 3851.00	
Subtotal	\$ 3851.00	
Subtract total expenditures (section B above)	\$ 2375.99	
Cash on hand at close of reporting period	\$ 1475.01	
SECTION D—DEBTS AND OBLIGATIONS:		
Part 11. Debts and obligations owed to the committee (use schedule E*)	\$ 141.00	
Part 12. Debts and obligations owed by the committee (use schedule E*)	\$ NONE	

*Schedules are to be used only when itemization is required. (See each Schedule for instructions.) When itemization is unnecessary for a given Part, the total of any amounts for that Part is to be entered as a lump sum on the "Unitemized" line of the appropriate Part of the Summary Report. The word "None" should be entered on any line of the Summary Report when no amount is being reported.

ITEMIZED RECEIPTS—CONTRIBUTIONS, TICKET PURCHASES, LOANS, AND TRANSFERS

UDALL '76 Massachusetts Special Events Committee Part No. 1

(Full Name of Candidate or Committee)

(Use for itemizing Part 1, 2, 3, 4, or 5)

SEE REVERSE SIDE FOR INSTRUCTIONS

(Use separate page(s) for each numbered Part)

Date (month, day, year)	Full Name, Mailing Address, and ZIP Code (occupation and principal place of business, if any)	Aggregate Year-to-date (complete if applicable)	Amount of Receipt This Period
1/15/75	Dr. Dean Allen, 64 State St, Amherst, Ma. 01002 Psychologist, Health Service, University of Massachusetts, Amherst, Ma	Aggregate Year-to-date \$	\$150.00
1/15/75	Isabella Grandin 301 Berkeley Street Boston, Ma 02116 Housewife	Aggregate Year-to-date \$	\$200.00
		Aggregate Year-to-date \$	
		Aggregate Year-to-date \$	
		Aggregate Year-to-date \$	
		Aggregate Year-to-date \$	
		Aggregate Year-to-date \$	
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		Aggregate Year-to-date \$	
		Aggregate Year-to-date \$	
		Aggregate Year-to-date \$	

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TOTAL THIS PERIOD \$350.00
(Last page of this Part only)

ITEMIZED RECEIPTS—SALES AND COLLECTIONS

UDALL '76 Massachusetts Special Events Committee
 (Full Name of Candidate or Committee)

Use for Part No. 2 only

SEE REVERSE SIDE FOR INSTRUCTIONS

Total Sum of Proceeds during the reporting period from:

1. Sale of tickets (List by event below)*	\$ 2145.00
2. Mass collections (List by event below)	\$ 1.00
3. Sale of Items	\$
Total (Carry forward to Part 2 of Summary)	\$ 2146.00

List of Sales and Collections by Event

8
2
0
4
0
3
2
3
7
3
8

Date of Event (month, day, year)	Type of Event	Amount From Sale of Tickets This Period*	Amount From Mass Collections This Period
2/1/75	Cocktail party	\$2145.00	\$1.00
TOTALS THIS PERIOD (Last page of this Schedule only)		\$2145.00	\$1.00

*After completion of the above list by event, use a separate Schedule A to list the date, full name and mailing address (occupation and principal place of business, if any) of each person who has purchased one or more tickets for events such as dinners, luncheons, rallies, and similar fundraising events during this reporting period in an amount in excess of \$100 or whose total ticket purchases to date for the calendar year (aggregate) are in excess of \$100. Attach the separate Schedule A to this Schedule.

ITEMIZED RECEIPTS—CONTRIBUTIONS, TICKET PURCHASES, LOANS, AND TRANSFERS

UDALL '76 Massachusetts Special Events Committee

Part No. 3

(Full Name of Candidate or Committee)

(Use for itemizing Part 1, 2, 3, 4, or 5)

SEE REVERSE SIDE FOR INSTRUCTIONS

(Use separate page(s) for each numbered Part)

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Date (month, day, year)	Full Name, Mailing Address, and ZIP Code (occupation and principal place of business, if any)	Aggregate Year-to-date (complete if applicable)	Amount of Receipt This Period
2/1/75	Chester G. Atkins 205 Great Road, Acton, Ma. State Senator, State House Boston, Ma.	deposit to Parker house for cocktail party Aggregate Year-to-date \$	\$800.00
		Aggregate Year-to-date \$	
		Aggregate Year-to-date \$	
		Aggregate Year-to-date \$	
		Aggregate Year-to-date \$	
		Aggregate Year-to-date \$	
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		Aggregate Year-to-date \$	
		Aggregate Year-to-date \$	
		Aggregate Year-to-date \$	
		Aggregate Year-to-date \$	

TOTAL THIS PERIOD \$800.00
(Last page of this Part only)

SCHEDULE D

ITEMIZED EXPENDITURES—PERSONAL SERVICES, LOANS, AND TRANSFERS

UDALL '76 Massachusetts Special Events Committee
(Full Name of Candidate or Committee)

Part No. 7
(Use for itemizing Part 7, 8, or 10)

SEE REVERSE SIDE FOR INSTRUCTIONS
(Use separate page(s) for each numbered Part)

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Date (month, day, year)	Full Name, Mailing Address, and ZIP Code (occupation and principal place of business, if any)	Amount of Expenditure This Period
2/26/75	Linda Hochman 23 Revolutionary Road Concord, Ma 01742 Administrative Asst. State Senator Chester Atkins Office State House Boston, Ma	\$185.29

TOTAL THIS PERIOD \$185.29
(Last page of this Part only)

ITEMIZED EXPENDITURES—PERSONAL SERVICES, LOANS, AND TRANSFERS

UDALL '76 Massachusetts Special Events Committee
(Full Name of Candidate or Committee)

Part No. 8
(Use for itemizing Part 7, 8, or 10)

SEE REVERSE SIDE FOR INSTRUCTIONS
(Use separate page(s) for each numbered Part)

Date (month, day, year)	Full Name, Mailing Address, and ZIP Code (occupation and principal place of business, if any)	Amount of Expenditure This Period
2/1/75	Dunfeys Parker House 800.00 deposit (see parts School and Tremont Sts. 3A, 9A) Boston, Mass. 659.00 expenditures (see \$141.00 part 9A)	\$141.00

8 2 0 4 0 3 2 3 7 4 1

TOTAL THIS PERIOD — \$141.00 —
(Last page of this Part only)

SCHEDULE E

DEBTS AND OBLIGATIONS

UDALL '76 Massachusetts Special Events Committee
(Full Name of Committee)

Part No. 11
(Use for Itemizing Part 11 or 12)

SEE REVERSE SIDE FOR INSTRUCTIONS

(Use separate page(s) for each numbered Part)

8
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2

Date Incurred (month, day, year)	Full Name, Mailing Address, and ZIP Code (occupation and principal place of business, if any)	Amount of Original Debt, Contract, Agree- ment, or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
2/1/75	Dunfeys Parker House School and Tremont Sts. Boston, Mass 02107	\$800.00	\$659.00	\$141.00
TOTALS THIS PERIOD (Last page of this Part only)				\$141.00

*Carry outstanding balance only to appropriate part of summary.

ITEMIZED EXPENDITURES - COMMUNICATIONS AND NON-COMMUNICATIONS MEDIA

UDALL '76 Massachusetts Special Events Committee

Part No. 9

(Full Name of Candidate or Committee)

(Use for itemizing Part 6 or 9)

SEE REVERSE SIDE FOR INSTRUCTIONS
(Use separate page (s) for each numbered Part)

DATE OF EXPENDITURE (Month, Day, Year)	PAYEE (Recipient of Payment) Full Name, Mailing Address, (occupation and principal place of business, if any)	PURPOSE OF EXPENDITURE (For communications media expenditures, also specify date(s) of use)	CHECK (✓) EXPENDITURE BY ELECTION					AMOUNT OF EXPENDITURE THIS PERIOD	ALLOCATE EXPENDITURES BY CANDIDATE (To be completed only by Committees supporting more than one candidate)	
			Primary	General	Special	Retiree	Concess to Organization		Full Name, Congressional District (if applicable), State, and Party	Amount of Expenditure This Period
1/30/75 2/1/75	Star Market Lowell Road Concord, Mass 01742	Food for dinner party 2/1/75	X					\$224.99		
2/26/75	Chester G. Atkins 205 Great Road, Acton, Ma State Senator State House Boston, Ma	loan repayment	X					\$800.00		
2/5/75	Dunfeys Parker House Tremont & School Sts. Boston, Ma 02107	UDALL weekend 2/1 - 2/2 cocktail party restaurant charges hotel charges	X					\$659.00		

TOTAL THIS PERIOD \$1683.99
(Last page of this Part only)

82040323744

No. 339669

RECEIPT FOR CERTIFIED MAIL—30¢ (plus postage)

SENT TO Federal Election Commission		POSTMARK OR DATE
STREET AND NO. 1325 K Street, N. W.		
P.O., STATE AND ZIP CODE Washington, D. C. 20005		
OPTIONAL SERVICES FOR ADDITIONAL FEE		
RETURN	1. Shows to whom and date delivered	15¢
RECEIPT	With delivery to addressee only	25¢
DELIVERY	2. Shows to whom, date and where delivered	35¢
	With delivery to addressee only	55¢
DELIVER TO ADDRESSEE ONLY		55¢
SPECIAL DELIVERY (extra fee required)		



PS Form 3800 Nov. 1971 **NO INSURANCE COVERAGE PROVIDED—NOT FOR INTERNATIONAL MAIL** (See other side) * 490-1070-107-000

Handwritten signature

COMPTROLLER GENERAL OF THE UNITED STATES

To: Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20005

U.S. GENERAL ACCOUNTING OFFICE
Washington, D.C.

REPORT OF RECEIPTS AND EXPENDITURES FOR A COMMITTEE

SUPPORTING ANY CANDIDATE(S) FOR NOMINATION OR ELECTION TO THE OFFICE OF
PRESIDENT OR VICE PRESIDENT OF THE UNITED STATES

UDALL '76 Massachusetts Special
(Full Name of Committee)

Identification Number

Events Committee

91 Main Street P.O. Box 540
(Street)

Massachusetts
State (If Primary, Convention, or Caucus)

Concord, Massachusetts 01742
(City, State, ZIP code)

TYPE OF REPORT

(Check Appropriate Box and Complete, if Applicable)

- March 10 report.
- June 10 report.
- September 10 report.
- January 31 report.
- Fifteenth day report preceding _____ election on _____
(Primary, general, caucus, or convention) (Date)
- Fifth day report preceding _____ election on _____
(Primary, general, caucus, or convention) (Date)
- Termination report.
July 10 report

VERIFICATION BY OATH OR AFFIRMATION

State of Massachusetts

County of Middlesex ss.

I, Henry J. Dane, being duly sworn, depose (affirm) and say
(Full Name of Treasurer of Committee)

that this Report of Receipts and Expenditures is complete, true, and correct.

[Signature]
(Signature of Treasurer of Committee)

Subscribed and sworn to (affirmed) before me this 3 day of July, A.D. 1975.

[Signature]
(Notary Public)

My commission expires November 27, 1981

[SEAL]

RETURN COMPLETED REPORT AND ATTACHMENTS TO:
Office of Federal Elections
U.S. General Accounting Office
441 G Street, N.W.
Washington, D.C. 20548

82040323745

GENERAL INFORMATION

(In accordance with the provisions of the Federal Election Campaign Act of 1971, P.L. 92-225)

SEE APPROPRIATE SUPERVISORY OFFICER'S MANUAL FOR ADDITIONAL REGULATIONS AND INSTRUCTIONS

A. Each treasurer of a political committee supporting a candidate or candidates for election to the office of President or Vice President of the United States shall file with the Comptroller General of the United States periodic reports of receipts and expenditures on the tenth day of March, June and September and by the thirty-first day of January in each year, and shall file pre-election reports on the fifteenth and fifth days next preceding the date on which the election is held. All of the periodic reports shall be complete as of the close of the next preceding month and the pre-election reports shall be complete as of midnight of the seventh day next preceding the filing date. Any contribution of \$5,000 or more (including a transfer of funds from a candidate or committee) which is received after the closing date prescribed for books for the last report prior to an election shall be separately reported within 48 hours after its receipt. Such contribution shall be reported to the Comptroller General by telegraph or hand delivered letter and shall be declared in the next report due under the Act. (Sec. 304.)

B. The Reports of Receipts and Expenditures shall be cumulative during the calendar year to which they relate, but where there has been no change in an item reported in a previous report during such year, only the amount need be carried forward. If no contributions or expenditures have been accepted or expended during a calendar year, the treasurer of the political committee shall file a statement to that effect. (Sec. 304.)

C. A copy of the Report of Receipts and Expenditures shall be preserved by the treasurer of the political committee or other person filing under section 305 of the Act for a period of four (4) years.

D. Any correction of information previously submitted in a Report of Receipts and Expenditures shall be reported to the Comptroller General within ten (10) days following discovery of the error. Such amendment to the Report of Receipts and Expenditures shall contain the date, identity of the committee, and the corrections appropriately identified, and shall be verified by the oath or affirmation of the person filing such information, taken before any officer authorized to administer oaths.

E. Every person (other than a political committee) who makes contributions or expenditures in support of a candidate for the office of President or Vice President, other than by contribution to a political committee or candidate, in an aggregate amount in excess of \$100 within a calendar year shall file with the Comptroller General a report containing the information required by section 304 of the Federal Election Campaign Act of 1971. This form may be used for such purpose. Reports required by this section shall be filed on the dates on which reports by political committees are filed, but need not be cumulative. (Sec. 305.)

DEFINITIONS FOR USE WITH THIS FORM

"candidate" means: an individual who seeks nomination for election, or election, to Federal office, whether or not such individual is elected, and, for purposes of this paragraph, an individual shall be deemed to seek nomination for election, or election, if he has (1) taken the action necessary under the law of a State to qualify himself for nomination for election, or election, to Federal office, or (2) received contributions or made expenditures, or has given his consent for any other person to receive contributions or make expenditures, with a view to bringing about his nomination for election, or election, to such office;

"contribution" means: (1) a gift, subscription, loan, advance, or deposit of money or anything of value, made for the purpose of influencing the nomination for election, or election, of any person to Federal office or as a presidential or vice-presidential elector, or for the purpose of influencing the result of a primary held for the selection of delegates to a national nominating convention of a political party or for the expression of a preference for the nomination of persons for election to the office of President, or for the purpose of influencing the election of delegates to a constitutional convention for proposing amendments to the Constitution of the United States; (2) a contract, promise, or agreement, whether or not legally enforceable, to make a contribution for any such purpose; (3) a transfer of funds between political committees; (4) the payment, by any person other than a candidate or political committee, of compensation for the personal services of another person which are rendered to such candidate or committee without charge for any such purpose; and (5) notwithstanding the foregoing meanings of "contribution", the word shall not be construed to include services provided without compensation by individuals volunteering a portion or all of their time on behalf of a candidate or political committee;

"election" means: (1) a general, special, primary, or runoff election, (2) a convention or caucus of a political party held to nominate a candidate, (3) a primary election held for the selection of delegates to a national nominating convention of a political party, (4) a primary election held for the expression of a preference for the nomination of persons for election to the office of President, and (5) the election of delegates to a constitutional convention for proposing amendments to the Constitution of the United States;

"expenditure" means: (1) a purchase, payment, distribution, loan, advance, deposit, or gift of money or anything of value, made for the purpose of influencing the nomination for election, or election, of any person to Federal office, or as a presidential or vice-presidential elector, or for the purpose of influencing the result of a primary held for the selection of delegates to a national nominating convention of a political party or for the expression of a preference for the nomination of persons for election to the office of President, or for the purpose of influencing the election of delegates to a constitutional convention for proposing amendments to the Constitution of the United States; (2) a contract, promise, or agreement, whether or not legally enforceable, to make an expenditure, and (3) a transfer of funds between political committees;

"Federal office" means: the office of President or Vice President of the United States; or of Senator or Representative in, or Delegate or Resident Commissioner to, the Congress of the United States;

"file", "filed", and "filing" mean: delivery to the Comptroller General of the United States, Washington, D.C., by midnight of the prescribed filing date, or deposit as certified air mail, in an established U.S. Post Office, postage prepaid, no later than midnight of the second day next preceding the filing date. Certified mail receipt shall be retained as evidence of mailing. Documents deposited within 500 miles from Washington, D.C. need not be sent by air mail but shall be certified. In the event the mailing deadline falls on a day in which no mail is certified, the next preceding day on which mail is certified shall be deemed the mailing date;

"person" means: an individual, partnership, committee, association, corporation, labor organization, and any other organization or group of persons;

"political committee" means: any committee, association, or organization which accepts contributions or makes expenditures during a calendar year in an aggregate amount exceeding \$1,000;

"State" means: each State of the United States, the District of Columbia, the Commonwealth of Puerto Rico, and any territory or possession of the United States; and

"supervisory officer" means: the Secretary of the Senate with respect to candidates for Senator; the Clerk of the House of Representatives with respect to candidates for Representative in, or Delegate or Resident Commissioner to, the Congress of the United States; and the Comptroller General of the United States in any other case.

3 2 0 4 0 3 2 3 7 4 6

Name of Committee UDALL '75 Massachusetts Special Events Committee

SUMMARY REPORT COVERING PERIOD FROM 2/28/75 THRU 7/1/75

	Column 4— This period	Column 5— Calendar year to date
SECTION A—RECEIPTS:		
Part 1. Individual contributions:		
a. Itemized (use schedule A*)	\$ none	
b. Unitemized	\$ 88.00	
Total individual contributions	\$ 88.00	\$ 993.00
Part 2. Sales and collections:		
Itemize (use schedule B*)	\$ 190.00	\$ 2336.00
Part 3. Loans received:		
a. Itemized (use schedule A*)	\$ none	
b. Unitemized	\$ none	
Total loans received	\$ none	\$ 800.00
Part 4. Other receipts (refunds, rebates, interest, etc.):		
a. Itemized (use schedule A*)	\$ 402.70	
b. Unitemized	\$ none	
Total other receipts	\$ 402.70	\$ 402.70
Part 5. Transfers in:		
Itemize all (use schedule A*)	\$ none	\$ none
TOTAL RECEIPTS	\$ 680.70	\$ 4531.70
SECTION B—EXPENDITURES:		
Part 6. Communications media expenditures:		
Itemize all (use schedule C*)	\$ 100.00	\$ 100.00
Part 7. Expenditures for personal services, salaries, and reimbursed expenses:		
a. Itemized (use schedule D*)	\$ 120.00	
b. Unitemized	\$ 31.87	
Total expenditures for personal services, salaries, and reimbursed expenses	\$ 151.87	\$ 448.26
Part 8. Loans made:		
a. Itemized (use schedule D*)	\$ none	
b. Unitemized	\$ none	
Total loans made	\$ none	\$ 141.00
Part 9. Other expenditures:		
a. Itemized (use schedule C*)	\$ 398.21	
b. Unitemized	\$ 37.97	
Total other expenditures	\$ 436.18	\$ 2374.78
Part 10. Transfers out:		
Itemize all (use schedule D*)	\$ 1467.66	\$ 1467.66
TOTAL EXPENDITURES	\$ 2155.71	\$ 4531.70
SECTION C—CASH BALANCES:		
Cash on hand at beginning of reporting period	\$ 1475.01	
Add total receipts (section A above)	\$ 680.70	
Subtotal	\$ 2155.71	
Subtract total expenditures (section B above)	\$ 2155.71	
Cash on hand at close of reporting period	\$ none	
SECTION D—DEBTS AND OBLIGATIONS:		
Part 11. Debts and obligations owed to the committee (use schedule E*):		
	\$ none	
Part 12. Debts and obligations owed by the committee (use schedule E*):		
	\$ none	

*Schedules are to be used only when itemization is required. (See each Schedule for instructions.) When itemization is unnecessary for a given Part, the total of any amounts for that Part is to be entered as a lump sum on the "Unitemized" line of the appropriate Part of the Summary Report. The word "None" should be entered on any line of the Summary Report when no amount is being reported.

SCHEDULE B
ITEMIZED RECEIPTS—SALES AND COLLECTIONS

UDALL, '76 Massachusetts Special Events Committee
 (Full Name of Candidate or Committee)

Use for Part No. 2 only

SEE REVERSE SIDE FOR INSTRUCTIONS

Total Sum of Proceeds during the reporting period from:

1. Sale of tickets (List by event below)*	\$ 190.00
2. Mass collections (List by event below)	\$ 0
3. Sale of Items	\$ 0
Total (Carry forward to Part 2 of Summary)	\$ 190.00

List of Sales and Collections by Event

Date of Event (month, day, year)	Type of Event	Amount From Sale of Tickets This Period*	Amount From Mass Collections This Period
2/1/75	Cocktail party	190.00	
TOTALS THIS PERIOD (Last page of this Schedule only)		190.00	

*After completion of the above list by event, use a separate Schedule A to list the date, full name and mailing address (occupation and principal place of business, if any) of each person who has purchased one or more tickets for events such as dinners, luncheons, rallies, and similar fundraising events during this reporting period in an amount in excess of \$100 or whose total ticket purchases to date for the calendar year (aggregate) are in excess of \$100. Attach the separate Schedule A to this Schedule.

SCHEDULE A

ITEMIZED RECEIPTS—CONTRIBUTIONS, TICKET PURCHASES, LOANS, AND TRANSFERS

UDALL '76 Massachusetts Special Events Committee
 (Full Name of Candidate or Committee)

Part No. 4
 (Use for itemizing Part 1, 2, 3, 4, or 5)

SEE REVERSE SIDE FOR INSTRUCTIONS
 (Use separate page (s) for each numbered Part)

Date (month, day, year)	Full Name, Mailing Address, and ZIP Code (occupation and principal place of business, if any)	Aggregate Year-to-date (complete if applicable)	Amount of Receipt This Period
4/10/75	Dunfey Family Corp. Hampton, N.H. 03842 Refund on \$800 deposit to Parker House for cocktail party 2/1/75-based on sale of liquor at event.	Aggregate Year-to-date \$	402.70
		Aggregate Year-to-date \$	
		Aggregate Year-to-date \$	
		Aggregate Year-to-date \$	
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TOTAL THIS PERIOD 402.70
 (Last page of this Part only)

ITEMIZED EXPENDITURES - COMMUNICATIONS AND NON-COMMUNICATIONS MEDIA

UDALL '76 Massachusetts Special Events Committee

Part No. 6

(Full Name of Candidate or Committee)

(Use for itemizing Part 6 or 9)

SEE REVERSE SIDE FOR INSTRUCTIONS
(Use separate page (s) for each numbered Part)

DATE OF PAYMENT (month, day, year)	PAYEE (Recipient of Payment) Full Name, Mailing Address, (occupation and principal place of business, if any)	PURPOSE OF EXPENDITURE (For communications media expenditures, also specify date(s) of use)	CHECK (✓) EXPENDITURE BY ELECTION					AMOUNT OF EXPENDITURE THIS PERIOD	ALLOCATE EXPENDITURES BY CANDIDATE (To be completed only by Committees supporting more than one candidate)	
			Primary	General	Special	Recall	Constitutional		Full Name, Congressional District (if applicable), State, and Party	Amount of Expenditure This Period
4/17/75	Masscasting Corp. 581 Boylston St. Boston, MA 02116	Recording Udall at Parker House and distribution 2/1/75	x					100.00		

TOTAL THIS PERIOD 100.00
(Last page of this Part only)

SCHEDULE D

ITEMIZED EXPENDITURES—PERSONAL SERVICES, LOANS, AND TRANSFERS

UDALL, '76 Massachusetts Special Events Committee
(Full Name of Candidate or Committee)

Part No. 7
(Use for itemizing Part 7, 8, or 10)

SEE REVERSE SIDE FOR INSTRUCTIONS
(Use separate page(s) for each numbered Part)

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Date (month, day, year)	Full Name, Mailing Address, and ZIP Code (occupation and principal place of business, if any)	Amount of Expenditure This Period
5/28/75	State Senator Chester G. Atkins Room 413 F State House Boston, MA Reimbursement for postage	120.00

TOTAL THIS PERIOD 120.00
(Last page of this Part only)

ITEMIZED EXPENDITURES - COMMUNICATIONS AND NON-COMMUNICATIONS MEDIA

UDALL ' 76 Massachusetts Special Events Committee

Part No. 9

(Full Name of Candidate or Committee)

(Use for itemizing Part 6 or 9)

SEE REVERSE SIDE FOR INSTRUCTIONS
(Use separate page (s) for each numbered Part)

DATE OF PAYMENT (month, day, year)	PAYEE (Recipient of Payment) Full Name, Mailing Address, (occupation and principal place of business, if any)	PURPOSE OF EXPENDITURE (For communications media expenditures, also specify date(s) of use)	CHECK (✓) EXPENDITURE BY ELECTION					AMOUNT OF EXPENDITURE THIS PERIOD	ALLOCATE EXPENDITURES BY CANDIDATE (To be completed only by Committees supporting more than one candidate)	
			Primary	General	Special	House	Senate or Convention		Full Name, Congressional District (if applicable), State, and Party	Amount of Expenditure This Period
3/3/75	Worcester Ruling and Binding Co., Inc. 53 Hermon Street Worcester, Ma 01608	Printing for reception 2/1/75	x					213.21		
4/15/75	Postal Instant Press 60 Federal Street Boston, MA 02110	Printing	x					185.00		

TOTAL THIS PERIOD 398.21
(Last page of this Part only)

EXHIBIT B

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FEDERAL ELECTION COMMISSION

RECEIVED

WASHINGTON, DC 20463

JUL 30 1975

July 24, 1975

HENRY J. DANE

UDALL '76 Massachusetts Special
Events Committee
91 Main Street, P.O. Box 540
Concord, Massachusetts 01742

Dear Mr. Dane:

This letter is to acknowledge receipt
of your July 10 report on July 7, 1975.

All future correspondence or reports
should be addressed to the Federal Election Commission,
1325 K Street, N.W., 20463.

Sincerely,

Gordon Andrew McKay,
Assistant Staff Director
for Disclosure and
Compliance

*Copy sent to
F Kelly
& P Stern
7/30/75*

82040323755

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

ACKNOWLEDGEMENT OF RECEIPT
OF THE
RECEIPTS AND EXPENDITURES REPORT

Covering the period from 1/24/75 through 7/1/75

Date: 1/15/76

Udall '76 Massachusetts Special Events
Committee
91 Main Street
Concord, MA 01742

Your report of Receipts and Expenditures
filed pursuant to the FEDERAL ELECTION CAMPAIGN
ACT, as amended, has been received and is hereby
acknowledged.

FEDERAL ELECTION COMMISSION

() LATE FILING

RECEIVED

JAN 19 1976

HENRY J. DANE

FEC FORM 15

82040323756

EXHIBIT C

82040323757



FEDERAL ELECTION COMMISSION

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

March 2, 1976

Mr. Henry Dane
Udall '76 Massachusetts Special Events Committee
91 Main Street
Concord, Massachusetts 01742

Dear Mr. Dane:

At your request, I am writing to confirm that the February 10, 1976 letter which advised the Udall '76 Massachusetts Special Events Committee of failure to file a January 31 report was sent in error.

Records at the Commission clearly reflect that the committee submitted a valid Termination Report in July 1975 and no fourth quarter report was due.

The Commission apologizes for its oversight in this matter and points out that the February 10 letter was not a matter of public record. If the Commission can be of further assistance to you, please do not hesitate to write or call (202/382-3484).

Sincerely,

Patricia Schering, Chief
Reports Examining Section

RECEIVED

MAR 8 1976

HENRY J. DANE



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COPY

Ans
2/19/76

HENRY J. DANE
ATTORNEY-AT-LAW
91 MAIN STREET
CONCORD, MASSACHUSETTS 01742
AREA CODE 617 EM 8-8888

February 18, 1976

Mr. Gordon Andrew McKay
Assistant Staff Director for
Disclosure and Compliance
Federal Election Commission
1325 K Street, N. W.
Washington, D. C. 20463

Dear Mr. McKay:

This letter is in response to your recent letter concerning reports of the Udall '76 Massachusetts Special Events Committee. A termination report for this Committee was filed with your office on July 7, 1975 and according to FEC Form 1601 dated December 3, 1975, that filing was "accepted as a termination report." Additional information requested on Form 1601 was supplied by us and acknowledged by Form 15 dated January 15, 1976. There has been no activity whatever in the accounts of this Committee since the filing of the termination report, and year-end data would be identical in all respects to that provided in July.

If we are nevertheless required to file a year-end report, please let me know and provide the appropriate forms.

Yours sincerely,

Henry J. Dane

Certified Mail No. 339701

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82040323760

McKay - Rec

SENDER: Be sure to follow instructions on other side

PLEASE FURNISH SERVICE(S) INDICATED BY CHECKED BLOCK(S)
(Additional charges required for these services)

Show to whom, date and address where delivered Deliver ONLY to addressee

RECEIPT
 Received the numbered article described below

REGISTERED NO. _____ SIGNATURE OR NAME OF ADDRESSEE (Must always be filled in)

CERTIFIED NO. **339701** **FEDERAL ELECTION COMMISSION**

INSURED NO. _____ SIGNATURE OF ADDRESSEE'S AGENT, IF ANY


DATE DELIVERED _____ 1325 K STREET, N.W.

SHOW WHERE DELIVERED (Only if requested, and include ZIP Code)

WASHINGTON; D.C. 20463

No. 339701

RECEIPT FOR CERTIFIED MAIL—30¢ (plus postage)

SENT TO	Mr. Gordon A. McKay Federal Election Commission	POSTMARK OR DATE
STREET AND NO.	1325 K Street, N. W.	
P.O. STATE AND ZIP CODE	Washington, D.C. 20463	
OPTIONAL SERVICES FOR ADDITIONAL FEES		
RETURN RECEIPT SERVICES	1. Shows to whom and date delivered 15¢ With delivery to addressee only 85¢ 2. Shows to whom, date and where delivered 35¢ With delivery to addressee only 85¢	
DELIVER TO ADDRESSEE ONLY 50¢		
SPECIAL DELIVERY (extra fee required).....		

PS Form 3800 NO INSURANCE COVERAGE PROVIDED— (See other side)
 Nov. 1971 NOT FOR INTERNATIONAL MAIL * GPO: 1976 O-267-200

EXHIBIT D

8204032376.1

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

kb

REQUEST FOR ADDITIONAL INFORMATION FOR A REPORT OF RECEIPTS AND EXPENDITURES FILED
 PURSUANT TO THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED

Covering the Period from 2/28/75 through 7/1/75

TO: UDALL 76 MASSACHUSETTS SPECIAL EVENTS COMMITTEE
 Concord, Mass.

DATE: 12-3-75

Your report of receipts and expenditures has been received and is hereby acknowledged. A review of the report indicates that additional information is needed in order for the report to be considered complete.

Coverage dates omitted or incorrect
 Failure to report year-to-date totals on Summary Page

Failure to sign
 Incorrect or omitted totals on Summary Page

OMISSION OF REQUIRED DATA ON RECEIPTS AND EXPENDITURES	A 1	A 2	A 3	A 4	A 5	B 2	C 9	D 7	D 8	D 10	E 11	E 12
6.2 <input type="checkbox"/> Schedule totals <input type="checkbox"/> do not agree with Summary Page <input type="checkbox"/> omitted												
3 <input type="checkbox"/> Dates inadequate or omitted												
2 <input type="checkbox"/> Full name omitted												
3 <input type="checkbox"/> Mailing address inadequate or omitted												
0 <input type="checkbox"/> Occupation description inadequate or omitted												
4 <input type="checkbox"/> Prncpl.pl.bus. inadequate or omitted												
0 <input type="checkbox"/> Aggregate year-to-date totals omitted												
2 <input type="checkbox"/> Purpose of expenditure omitted												
0 <input checked="" type="checkbox"/> Inadequate description of <input checked="" type="checkbox"/> Events Location <input type="checkbox"/> Dates <input type="checkbox"/> Proceeds							X					
<input type="checkbox"/> Nature of debts and obligations omitted or inadequate												

OTHER: Your filing is being accepted as a termination report. However, please be advised that this does not relieve your committee of the obligation to supply information omitted from reports and statements required by the Federal Election Campaign Act of 1971, as amended, for this or previous reporting periods.

Your initial submission, together with this request for additional information, has been made available for public inspection. The Commission urges you to file the additional submission(s) promptly. If you have any questions regarding this request, please call the Reports Examining Division (202-382-3484).

Please submit the information required to:

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

EXHIBIT B

8204032376'3

COPY

Sub 1-23-75

HENRY J. DANE
ATTORNEY-AT-LAW
91 MAIN STREET
CONCORD, MASSACHUSETTS 01742
AREA CODE 617 EM 9-8992

January 23, 1975.

Mr. John Gabusi
Office of Hon. Morris K. Udall
1424 LHOB
House of Representatives
Washington, D.C. 20515

Dear Mr. Gabusi:

I enclose copies of the following for your files:

1. Letter dated January 22, 1975 from me to Mr. William Sullivan of the Massachusetts Office of Campaign and Political Finance.
2. Notice Of Organization for the Udall '76 Massachusetts Special Events Committee filed with the above office.
3. Letter dated January 22, 1975 from me to the Secretary of the Commonwealth of Massachusetts.
4. Comptroller General Election Form 1 filed with the Office of Federal Elections.

Yours sincerely,

Henry J. Dane

Enclosures: 4

bcc: Senator Chester G. Atkins

82040323764

HENRY J. DANE
ATTORNEY AT LAW
P. O. BOX 840
91 MAIN STREET
CONCORD, MASSACHUSETTS 01742

AREA CODE 617 EM 9-6333

CABLE ADDRESS: DANELAW

January 22, 1975

Mr. William Sullivan
Commonwealth of Massachusetts
Office of Campaign and Political Finances
Eight Beacon Street
Boston, Massachusetts 02108

Re: Udall '76 Massachusetts
Special Events Committee

Dear Bill:

In accordance with our telephone conversations of January 10 and this morning, I enclose for filing the official form notifying you of the organization of the Udall '76 Massachusetts Special Events Committee. This form is signed by both Senator Chester G. Atkins, the chairman, and by me, the treasurer. Rather than have the candidate sign the form, it is my understanding that you will obtain Congressman Udall's consent directly according to the provisions of General Laws chapter 55, section 3. The address that should be used for sending the consent form to Congressman Udall is:

Hon. Morris K. Udall
1424 LHOB
House of Representatives
Washington, D. C. 20515

Attention: Mr. John Gabusi.

We have made arrangements to open a depository account with the Harvard Trust Company, and all funds received will be deposited in this account.

I enclose for your information a copy of the completed Comptroller General Election Form 1 which we have filed with the office of the Comptroller General of the United States.

82040323765

sent 1/22

HENRY J. DANE

Letter to Mr. William Sullivan dated January 22, 1975 cont.

All of these steps are being taken in order to assure compliance with both the letter and spirit of the relevant Massachusetts laws, although we believe that Federal law has pre-empted the whole field. Section 301 of PL 93-443 (Federal Election Campaign Act Amendments of 1974) effective January 1, 1975 reads:

The provisions of this Act, and of rules prescribed under this Act, supercede and pre-empt any provision of State law with respect to election to Federal office.

Our view is that, whether or not we are required to comply with Massachusetts law, we welcome any form of filing and disclosure which will make information on political campaign activities more accessible to the public, and which will assist your office in fulfilling this function.

Would you please stamp or initial the enclosed copy of this letter and return it to me to acknowledge your receipt.

Sincerely yours,

Henry J. Dane
Treasurer
Udall'76 Massachusetts
Special Events Committee

Enclosure

cc: John Gabusi
Chester G. Atkins

82040323766

COPY

HENRY J. DANE
ATTORNEY-AT-LAW,
81 MAIN STREET
CONCORD, MASSACHUSETTS 01742
AREA CODE 617 EM 8-8300

July 7, 1975

Mr. John Gabusi
Office of the Honorable
Morris K. Udall
1424 LHOB
House of Representatives
Washington, D. C. 20515

Dear Mr. Gabusi:

I enclose, for your information, a copy of the report filed on July 3, 1975 with the Federal Election Commission for the UDALL '76 Massachusetts Special Events Committee.

You will note that this is a termination report and that the Committee will cease to exist as soon as all the legal requirements are met.

If you require any further information, please let me know.

Yours sincerely,

Henry J. Dane

Enclosure

32040323767

COPY

HENRY J. DANE
ATTORNEY-AT-LAW
91 MAIN STREET
CONCORD, MASSACHUSETTS 01742

AREA CODE 617 EM 9-8333

July 7, 1975

Miss Marcie Kripke
UDALL '76 Committee
530 Seventh Street, S. E.
Washington, D. C. 20003

Dear Miss Kripke:

I enclose for your information, a copy of the report filed on July 3, 1975 with the Federal Election Commission for the UDALL '76 Massachusetts Special Events Committee.

You will note that this is a termination report and that the Committee will cease to exist as soon as all the legal requirements are met.

If you require any further information, please let me know.

Yours sincerely,

Henry J. Dane

Enclosures:

Report of July 3, 1975
Report of March 10, 1975

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COPY

HENRY J. DANE
ATTORNEY-AT-LAW
81 MAIN STREET
CONCORD, MASSACHUSETTS 01742
AREA CODE 617 EM 9-8333

July 7, 1975

Mr. Stanley Kurs
National Finance Chairman
UDALL '76 Committee
122 East 42nd Street
New York, New York 10017

Dear Mr. Kurs:

I enclose, for your information, a copy of the report filed on July 3, 1975, with the Federal Election Commission for the UDALL '76 Massachusetts Special Events Committee.

You will note that this is a termination report and that the Committee will cease to exist as soon as all the legal requirements are met.

If you require any further information, please let me know.

Yours sincerely,

Henry J. Dane

Enclosures:

Report of July 3, 1975
Report of March 20, 1975

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EXHIBIT F

82040323770

5/29/75

May 29, 1975

Miss Marcie Kripke
Udall '76 Committee
530 7th St., S.E.
Washington, D.C. 20003

Dear Miss Kripke:

We are enclosing a check to the Udall '76 Committee in the amount of \$1,467.66. This represents the net funds raised by the Udall '76 Massachusetts Special Events Committee at fund-raising events held during the weekend of February 1, 1975 and contributions solicited directly by Massachusetts State Senator Chester G. Atkins.

After the enclosed check has cleared, the balance of our account will be zero.

All Committee transactions will be reported to the Office of Federal Elections on July 10, 1975, and it is our intention to file termination papers for the Massachusetts Committee at that time.

Yours sincerely,

Henry J. Dane

Enclosure

cc: John Gabusi
Chester Atkins

32040323771

HENRY J. DANE
ATTORNEY-AT-LAW
P. O. BOX 840
91 MAIN STREET
CONCORD, MASSACHUSETTS 01742

AREA CODE 617 EM 9-8833

CABLE ADDRESS: DANELAW

Mr. Stanley Kurs
National Finance Chairman
Udall '76 Committee
122 East 42 Street
New York, NY 10017

Dear Stanley,

I am enclosing the information you requested in our telephone conversation this morning. The items I am sending you include: 1) xerox copies of our contribution cards, 2) an itemized list of all disbursements, 3) xerox copies of deposit schedules for our depository account, and 4) balance sheet showing that our contributions less expenditures equal \$1,467.66, the amount forwarded to you by Henry Dane on May 29.

I am sending copies of the above items to Marcie Kripke as well.

I hope this will provide you with all the information you need. If we can be of any further help, please let us know.

Sincerely,

Phoebe Stern

Phoebe Stern
Director of Finance
Udall '76 Massachusetts
Special Events Committee

May 30, 1975

cc: Marcie Kripke

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EXHIBIT G

82040323773



REP. MORRIS UDALL addressing a group of Boston supporters at a kick-off, fund-raising party.

Staff Photo by Ted Gerland

Campaign Takes Udall to Boston

Rep. Morris K. Udall of Arizona brought his presidential campaign to Massachusetts yesterday, telling a group of supporters at the Parker House the Bay State was an important spot on anyone's journey to the White House.

The Democrat from the Southwest said at a fund-raising cocktail party, "The state of Massachusetts will play a key role in the election of the next President, as you did in the last election."

"You were right and the rest of the country was wrong," he said in reference to the fact that Massachusetts stood alone among the states against Richard Nixon in 1972.

Udall said that Massachusetts and New England were alone once more in the face of the current energy crisis and the administration's programs to combat it.

"You have been had," he said, "you have been taken all these years. Now the President is going to do it again."

Udall said President Ford's proposed system of rebates for New England meant to offset the imposition of oil import tariffs would not meet the area's problems.

He told the group he was working with Sen. Edward M. Kennedy and other members of the New England congressional delegation to improve the entire petroleum picture.

Udall, first elected to Congress in 1961, is chairman of an environmental subcommittee of the House Interior Committee and has been instrumental in conservation legislation.

Prior to his election, he practiced law in Arizona. He is a brother of Stewart Udall, secretary of the Interior during the Kennedy and Johnson administrations.

Tonight he was scheduled to speak at Massachusetts Institute of Technology before a gathering of Citizens for Participation in Political Action. And he was scheduled to be interviewed tomorrow on Channel 5's Good Morning television program.

82040323774

Udall plans Bay State primary run

By Stephen Curwood
Globe Staff

Massachusetts voters in the April 1978 presidential primary can expect to see US Rep. Morris Udall's name on the Democratic ballot, the Arizona congressman said yesterday in an interview.

"Yes, Massachusetts is high on my list of priorities," Udall said as he rested his lanky frame on a Parker House couch, but he hedged against making a formal announcement.

"I'm putting together an embryo of the organization that would work in the primary. The final decision will be made this fall."

Udall had just come from a briefing session with Massachusetts black leaders and was on his way to a fund raiser and later dinner at the home of MIT President Jerome Wiesner.

Today's part of his two day swing through the state has him scheduled to meet with Citizens for Participation in Political Action (CCPAX), a women's political group, student leaders, labor leaders and state Democrats including Mayor Kevin H. White, Secretary of State Paul Guzzi and Senate Majority Leader Joseph DiCarlo.

Udall is clearly running hard for the Democratic presidential nomination. He's raised \$50,000 so far and expects to have about \$100,000 in his campaign chest later this spring and thus qualify for matching Federal public campaign finances derived from the income tax check-off. Why is he running?

82040323775

"If Democrats want to win in 1976, they need a new face," he said, pulling off his black-framed glasses. "I'm in this race because some 20 other congressmen said that new face and asked me to run. They have asked why are you not a senator and not a governor or congressman, mentioned as presidential aspirant."

Udall is chairman of the House Interior Committee's Energy and Environment subcommittee, and his work there is basic to his campaign.

"Economy, energy and the environment, these are the issues," he said. "We need jobs, and the days of \$2-a-barrel oil are gone for good."

What would Udall do if he becomes the first representative to be elected President since James A. Garfield in 1880?

"Allocation and/or rationing of gas," he said tapping his glasses against the palm of his hand, "and a clear message to Detroit to stop its paralysis. We ought to have no tax for a car that gets 22 miles to the gallon, a slight tax for one that gets 18 and a whopper for one that gets only 10."

Udall then went on that he sponsored a \$20 billion measure that was recently signed into law to conduct research into nonnuclear methods of getting energy.

"Solar, wind, geothermal — we got to study these," he said. "At the same time we need national debate over the wisdom of nuclear power — is it safe enough to use?"

Udall would also seek a 10 to 15 percent cut in defense spending.

Asked about the \$300 million that South Vietnam's President Thieu is seeking right now, Udall has two words: "No way."

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EXHIBIT B

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(b) Keep an account of all expenditures made by or on behalf of such committee, and

- (1) The identification of every person to whom any expenditure is made,
- (2) The date of the expenditure,
- (3) The amount of the expenditure,
- (4) The name of each candidate on whose behalf such expenditure was made, and
- (5) The office sought by the candidate.

(c) Obtain and keep a receipted bill from the person to whom the expenditure is made for every expenditure made by or on behalf of a political committee—

- (1) In excess of \$100;
- (2) In a lesser amount if the aggregate amount of expenditures during a calendar year to the same person exceeds \$100;
- (3) The receipted bill must contain
 - (i) The full name and address of the person to whom the expenditure is made,
 - (ii) The amount of the expenditure,
 - (iii) The purpose of the expenditure, and
 - (iv) The date the expenditure was made.

(4) In lieu of a receipted bill, the treasurer may keep

- (i) The canceled check(s) showing payment(s) of the bill, and
- (ii) The bill, invoice or other contemporaneous memorandum of the transaction containing the same information as required in paragraph (c) (3) of this section.

(d) The treasurer of each political committee and each candidate shall keep full and complete records of proceeds from the sale of tickets and mass collections at each dinner, luncheon, rally, and other fundraising events, and such records shall include the date, location, and nature of each event. He or she shall also keep full and complete records of the proceeds from the sale of items such as political campaign pins, buttons, badges, flags, emblems, hats, banners, literature, jewelry, watches, trinkets, and similar materials, and such records shall reflect the cost of the items to the committee, the sale price, and the total volume sold of each general category of item. Such records shall be preserved in accordance with § 110.2 of this subchapter.

§ 103.4 Photocopies of checks.

Each committee or candidate which receives or anticipates receiving contributions in excess of \$25,000 during a calendar year shall maintain a photocopy of all contributor checks, money orders, or similar instrument which are for an amount in excess of \$100. Such checks will be kept in a manner which will allow each check to be associated with the appropriate bank deposit slip.

§ 103.5 Petty cash fund.

A political committee may maintain a petty cash fund out of which it may make expenditures not in excess of \$100 to any person in connection with a single purchase or transaction. If such a petty cash fund is maintained, it shall be the duty of the treasurer of such political

committee to keep and maintain a written journal of all disbursements from such fund, but such treasurer need not preserve receipts or invoices in connection with such transactions.

§ 103.6 Designation of principal campaign committee.

(a) When an individual becomes a candidate for Federal office (other than for election to the office of Vice President of the United States), he or she shall designate a political committee as his or her principal campaign committee.

(b) No political committee may be designated as the principal campaign committee of more than one candidate.

(c) No political committee which supports more than one candidate may be designated as a principal campaign committee, except that, after nomination, a candidate for the office of President of the United States may designate the national committee of such political party as his or her principal campaign committee.

§ 103.7 Authorization of political committee.

Any political committee authorized by a candidate to receive contributions or make expenditures must be authorized in writing by such candidate. Such authorization must include a designation of campaign depositories to be used by such political committee in accordance with § 103.3 (a) (1) (ii).

§ 103.8 Unauthorized activity; notice.

Any unauthorized political committee shall—

(a) Publish a notice as set out in paragraph (b) of this section, stating that the committee is not authorized by a candidate and that the candidate is not responsible in any way for the activities of the committee.

(b) Such notice shall be included on all literature, advertisements (including radio and television announcements and advertisements), stationery and similar material published or otherwise distributed by the committee or on its behalf in connection with its campaign activity.

§ 103.9 Records; retention.

The treasurer of every political committee shall preserve all receipts, bills, accounts and all other records required to be kept in accordance with the requirements of § 110.2 of this subchapter.

§ 103.10 Segregated funds.

All funds of a political committee shall be segregated from, and may not be commingled with, any personal funds of officers, members, or associates of such committee.

PART 104—CAMPAIGN DEPOSITORIES

Sec.

- 104.1 Notification of the Commission.
- 104.2 Depositories.
- 104.3 Deposits and expenditures.
- 104.4 Presidential and Vice-Presidential candidate campaign depositories.

AUTHORITY: Sec. 308, 86 Stat. 17 (2 U.S.C. 438), interpret or apply sec. 302, 86 Stat. 12 (2 U.S.C. 437), as amended.

§ 104.1 Notification of the Commission.

(a) Each unauthorized single candidate committee, each multicandidate committee (whether authorized or unauthorized); and each party committee shall designate a state or national bank as its campaign depository on its Statement of Organization.

(b) Any other political committee shall inform the Federal Election Commission, or its appropriate principal campaign committee, of the bank(s) designated by its authorizing candidate pursuant to § 113.3 of this subchapter as its campaign depository(ies), by listing them in its Statement of Organization.

(c) Each registered political committee which changes its designated campaign depository(ies), shall amend its Statement of Organization pursuant to § 102.3 (a) of this subchapter, listing the currently designated campaign depositories.

§ 104.2 Depositories.

Only national or state banks chartered by the United States or a state may be designated as campaign depositories. One or more depositories may be established in one or more states. One or more accounts may be established at a depository.

§ 104.3 Deposits and expenditures.

All contributions received by a candidate, his or her authorized political committee(s) and any other political committee(s) shall be deposited in the appropriate campaign depository by the candidate, or by the treasurer of such committee or his or her designee within 3 business days of the candidate's or treasurer's receipt thereof. An expenditure may be made by any committee only by check drawn on an account in a designated campaign depository, except expenditures to one person for \$100 or less in connection with a single transaction or purchase. Expenditures for \$100 or less may be made from a petty cash fund, maintained pursuant to § 103.4 of this subchapter.

§ 104.4 Presidential and Vice-Presidential candidate campaign depositories.

A presidential candidate's principal campaign committee, and any political committee authorized by such candidate to receive contributions or to make expenditures on his or her behalf in a state will utilize the bank(s) designated pursuant to § 101.3 of this subchapter as the candidate's campaign depository(ies) for that state. The campaign depository(ies) designated by a political party's candidate for President will be the campaign depository(ies) of that political party's candidate for the office of Vice-President.

PART 105—REPORTS BY POLITICAL COMMITTEES AND CANDIDATES TO THE FEDERAL ELECTION COMMISSION

Sec.

- 105.1 General.
- 105.2 Form and content of reports.
- 105.3 Disclosure of receipt and consumption of in kind contributions.
- 105.4 Filing dates and periods covered.

EXHIBIT I

82040323779

FEC Form 24
January 1976
Federal Election Commission
1225 K Street, N.W.
Washington, D.C. 20463

**Candidate Authorization
of a Political Committee
other than a Principal Campaign Committee**

Note: Committees authorized to receive contributions and make expenditures in connection with more than one election must maintain separate records with respect to each election, and file separate reports with respect to each election.

1(a) Name of Candidate (in full)	2 Identification Number	3 Party Affiliation
(b) Address (number and street)	4 Office Sought	
(c) City, State and ZIP code	5 District and State of Candidate	

6 I hereby authorize the following named political committee to receive contributions and make expenditures on my behalf in support of my candidacy in the _____ election(s) held _____ (Date(s))
(General, Primary, Runoff)

(a) Name of Committee (in full)
(b) Address (number and street)
(c) City, State and ZIP code

7 I hereby designate the following national and/or State bank(s) as campaign depository(ies) to be used by the above political committee.

(a) Name of Bank (in full)	(a) Name of Bank (in full)
(b) Address (number and street)	(b) Address (number and street)
(c) City, State and ZIP code	(c) City, State and ZIP code
(a) Name of Bank (in full)	(a) Name of Bank (in full)
(b) Address (number and street)	(b) Address (number and street)
(c) City, State and ZIP code	(c) City, State and ZIP code

8 The committee's reports of receipts and expenditures will be filed with _____ (Name of Principal Campaign Committee)
_____, my designated principal campaign committee for the above election(s)

(Signature of Candidate) (Date)

For further
information
contact:



Federal Election Commission
1225 K Street, N.W.
Washington, D.C. 20463

Notice

A candidate for Federal office must complete this Statement of Authorization for each committee, other than a principal campaign committee, which is authorized by the candidate to receive contributions and make expenditures on his behalf.

One copy of the statement should be maintained by the Principal Campaign Committee, one by the treasurer of the authorized committee and one copy should be filed with the Commission.

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DANE & GREENBERG

P. O. BOX 648

91 MAIN STREET

CONCORD, MASSACHUSETTS 01742

82040323701



MS. FRANCES B. HAGAN
FEDERAL ELECTION COMMISSION
1325 K STREET, N.W.
WASHINGTON, D.C. 20463

CERTIFIED

No. 612688

300*
11520

Raymond Johnson
US All Maryland Campaign
11011 Viers Mill Rd
Wheaton Md 20902

10/29/79

William C Oldaker, General Counsel
Federal Elections Commission
1325 K St NW
Wash DC 20463

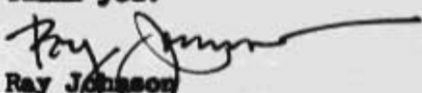
re: MUR 993

attn: Frances B Hagan

Dear Frances:

In keeping with our telephone conversat~~on~~, I am willing to cooperate but I don't know specifically what is wanted to satisfy your office. If you could help me in this I would greatly appreciate it and would supply that information as best as I can do at this time.

Thank you.


Ray Johnson
Treasurer

964799

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REC'D
OFFICE OF THE
GENERAL COUNSEL

11011 VEIRS MILL ROAD
WHEATON, MARYLAND 20902

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attn Frances B Hagan

FEC William C Oldaker

1325 K St NW

Wash DC 20463



320
11570

1610 Morgan
Wooster, Ohio 44691
October 29, 1979

014768

Mr. William C. Oldaker, General Counsel
Federal Election Commission
Washington, D. C. 20463

Attention: Frances B. Hagan

Re: MUR993

Dear Ms. Hagan:

Thank you for your assistance on the phone last Thursday.

As I stated to you, all records for the Ohio campaign are with the National Committee. Therefore, I cannot be of assistance.

In reference to any violations; to the extent that I controlled the receipts and expenditures, every effort was made to comply with all regulations. Again, as I stated, the last two to three weeks were not under my control and in that hectic time, some slippage may have occurred.

As I tried to re-construct records for my final reports, I found no evidence of any fraud or illegal contributions; therefore I signed those reports.

I hope this will answer your questions. If there exists any further problems, I now plan to be in Washington during February if needed.

Sincerely,

M. F. Ludowese
1610 Morgan
Wooster, Ohio 44691
Treasurer, Ohio Udall 76 Committee

MFL:ph

cc: Mrs. Stanley Kurz, Treasurer
Udall 76 Committee
122 E. 42nd St.
New York, New York 10017

82040323784

9 001 1 100 6,

RECEIVED
OCT 30 1979

M. E. Ludowese
1610 Morgan
Wooster, Ohio 44691



Mr. William C. Oldaker, General Counsel
Federal Election Commission
Washington, D. C. 20463

Attn: Frances B. Hagan

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Law Office
Duncan, Weinberg, Palmer & Miller, P.C.

SUITE 1200

1775 PENNSYLVANIA AVENUE, N. W.

WASHINGTON, D. C. 20006

(202) 467-6370

TELECOPY (202) 467-6379

WALLACE L. DUNCAN
EDWARD WEINBERG
FREDRICK D. PALMER
FREDERICK L. MILLER, JR.
JAMES P. PEMBROKE
PHILIP L. CHABOT, JR.
J. CATHY LICHTENBERG
RICHMOND F. ALLAN

OF COUNSEL
STEWART L. UDALL

ANCHORAGE OFFICE

DAN A. HENSLEY

SUITE 407

480 L STREET

ANCHORAGE, ALASKA 99501
(907) 276-1880

November 1, 1979

MUR 993

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

HAND DELIVERED

Re: MUR 993

Dear Mr. Oldaker:

By letters dated October 18, 1979, you notified the Udall '76 Committee and certain state committees of your findings concerning compliance with the Federal Election Campaign Act of 1971, as amended. You requested responses from the committees within 10 days of receipt of the letters.

The Udall '76 Committee which you state has overall responsibility in these matters, is presently in the process of preparing responses to your October 18 letters. However, due to the number of state committees involved, the Udall '76 Committee's responses will not be completed in the 10 day time frame. The Udall '76 Committee requests an extension until December 1, 1979 to coordinate, finalize and submit responses to your letters on its behalf and in regard to the letters sent to the various state committees.

Presently, we are of the opinion that we have sufficient data to interpret and reply to your October 18 letters. However, if additional information or guidance is needed, your office will be contacted.

This firm has been authorized to represent the Udall '76 Committee in this matter.

Sincerely yours,

James D. Pembroke
James D. Pembroke

JDP:ljh

cc: Messrs. K. Gross, E. Coyle, S. Kurz and Ms. Hagan

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3204032378

Law Offices

Duncan, Weinberg, Palmer & Miller, P.C.

SUITE 1200

1775 PENNSYLVANIA AVENUE, N. W.

WASHINGTON, D. C. 20006

Ms. Frances Hagan
The Federal Election Commission
1325 K Street, N.W.
Washington, D. C. 20463

HAND DELIVERED

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Law Offices

Duncan, Weinberg, Palmer & Miller, P.C.

SUITE 1200

1775 PENNSYLVANIA AVENUE, N. W.
WASHINGTON, D. C. 20006

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

HAND DELIVERED

Law Offices

Duncan, Weinberg, Palmer & Miller, P. C.

SUITE 1200

1775 PENNSYLVANIA AVENUE, N. W.

WASHINGTON, D. C. 20006

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

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE
FROM: MARJORIE W. EMMONS *MWE*
DATE: OCTOBER 22, 1979
SUBJECT: CORRECTION OF PAGE 3 OF THE CERTIFICATION
ON MUR 993

The correction requested in the General Counsel's Memorandum, undated, "Errata regarding MUR 993" has been made and the revised page 3 is attached.

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ATTACHMENT:
Revised Page 3 to
Certification on MUR 993

13. Find REASON TO BELIEVE that the Wisconsin '76 Committee violated the following:

- a. 2 U.S.C. §437b(b), 11 C.R.F. §102.10
- b. 2 U.S.C. §434(b)(2)

Attest:

10/22/79

Date

Marjorie W. Emons

Marjorie W. Emons
Secretary to the Commission

82040323791

Executive Session:	10-10-79
Certified:	10-12-79
Errata Memorandum Circulated:	10-22-79, 11:00
Re-Certified (Page 3):	10-22-79

October 19, 1979

MEMORANDUM TO: Marge Emmons
FROM: Jane Colgrove
SUBJECT: MUR 993

Please have the attached Memo to the Commission on MUR 993 distributed to the Commission on an informational basis. The certification should be changed accordingly.

Please return the original Memo to the Office of General Counsel after circulation. Thank you.

82040323792



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

79 OCT 19 P 4: 00

MEMORANDUM

TO: The Commission

FROM: William C. Oldaker
General Counsel *W. C. Oldaker*

SUBJECT: Errata regarding MUR 993

Regarding the First General Counsel's Report on the
Udall '76 Committee and State Affiliates dated September 28, 1979:

Recommendation #13b) (Wisconsin '76 Committee) on page 15
was listed erroneously as 2 U.S.C. § 434(b)(12). It should
read 2 U.S.C. § 434(b)(2).

We are requesting that the Commission Secretary correct
the certification accordingly.

32040323793



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
OCTOBER 22 1979
11:00
COMPTROLLER
SECRETARY

79 OCT 19 P 4: 00

MEMORANDUM

TO: The Commission
FROM: William C. Oldaker *WCO*
General Counsel
SUBJECT: Errata regarding MUR 993

Regarding the First General Counsel's Report on the
Udall '76 Committee and State Affiliates dated September 28, 1979:

Recommendation #13b) (Wisconsin '76 Committee) on page 15
was listed erroneously as 2 U.S.C. § 434(b)(12). It should
read 2 U.S.C. § 434(b)(2).

We are requesting that the Commission Secretary correct
the certification accordingly.

82040323794



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 18, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Raymond Johnson
Treasurer
Udall Maryland Campaign
1101 Viers Mill Road
Wheaton, Maryland 20902

Re: MUR 993

Dear Mr. Johnson:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that your committee may have violated the following sections of the Federal Election Campaign Act of 1971, as amended, ("the Act"): § 432(d) for failure to provide adequate documentation for expenditures; § 434(b)(2) and (7) for failure to itemize two telephone deposits as required; § 434(b)(4) for failure to itemize five transfers-in totaling \$7,910; and § 434(b)(8) and (11) for failure to accurately report total receipts and expenditures for the period March 1, 1976, through March 31, 1977. The figures were overstated by \$1,243.33. We have numbered this matter MUR 993. Please refer to this number in all future correspondence.

Under the Act, you have an opportunity to demonstrate that no action should be taken against your committee. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification. If no response is received, the Commission may take further action based on the information at hand. If you have any questions, please contact Frances B. Hagan, the staff member assigned to this matter, at (202) 523-4060.

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This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(3)(B) unless you notify the Commission in writing that you wish the investigation to be made public. If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,

William C. Oldaker
General Counsel

cc: Honorable Morris K. Udall
Mr. Stanley Kurz, Treasurer
Udall '76 Committee

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1. ARTICLE DESCRIPTION: REGISTERED NO. 913115 CERTIFIED NO. INSURED NO.		2. ARTICLE ADDRESSED TO: Raymond J. Johnson MD	
3. RESTRICTED DELIVERY <input type="checkbox"/> RESTRICTED DELIVERY <input type="checkbox"/> RESTRICTED DELIVERY <input type="checkbox"/> RESTRICTED DELIVERY Show to whom, date, address, and address (ORIGINAL POSTMASTER FOR RETURN)		RECEIVED FEDERAL BUREAU OF INVESTIGATION U.S. DEPARTMENT OF JUSTICE APR 15 1976	
4. OTHER INFORMATION (check one) <input type="checkbox"/> Other to whom, date, and address necessary <input type="checkbox"/> RESTRICTED DELIVERY <input type="checkbox"/> RESTRICTED DELIVERY <input type="checkbox"/> RESTRICTED DELIVERY Show to whom, date, address, and address (ORIGINAL POSTMASTER FOR RETURN)		5. OTHER INFORMATION (check one) <input type="checkbox"/> Other to whom, date, and address necessary <input type="checkbox"/> RESTRICTED DELIVERY <input type="checkbox"/> RESTRICTED DELIVERY <input type="checkbox"/> RESTRICTED DELIVERY Show to whom, date, address, and address (ORIGINAL POSTMASTER FOR RETURN)	

10-23-76
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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Raymond Johnson
Treasurer
Udall Maryland Campaign
1101 Viers Mill Road
Wheaton, Maryland 20902

Re: MUR 993

Dear Mr. Johnson:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that your committee may have violated the following sections of the Federal Election Campaign Act of 1971, as amended, ("the Act"): § 432(d) for failure to provide adequate documentation for expenditures; § 434(b)(2) and (7) for failure to itemize two telephone deposits as required; § 434(b)(4) for failure to itemize five transfers-in totaling \$7,910; and § 434(b)(8) and (11) for failure to accurately report total receipts and expenditures for the period March 1, 1976, through March 31, 1977. The figures were overstated by \$1,243.33. We have numbered this matter MUR 993. Please refer to this number in all future correspondence.

Under the Act, you have an opportunity to demonstrate that no action should be taken against your committee. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification. If no response is received, the Commission may take further action based on the information at hand. If you have any questions, please contact Frances B. Hagan, the staff member assigned to this matter, at (202) 523-4060.

82040323797

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(3)(B) unless you notify the Commission in writing that you wish the investigation to be made public. If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,

William C. Oldaker
General Counsel

cc: Honorable Morris K. Udall
Mr. Stanley Kurz, Treasurer
Udall '76 Committee

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 18, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Vivian Sue Molina
Treasurer
Massachusetts Udall '76 Committee
95 Appleton Street
Boston, Massachusetts 02116

Re: MUR 993

Dear Ms. Molina:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that your Committee may have violated § 434(b)(12) of the Federal Election Campaign Act of 1971, as amended, ("the Act"), and 11 C.F.R. § 114.10(c). These sections of the Act and Regulations require disclosure of debts until they are extinguished, along with a statement showing that the debt was settled in a commercially reasonable manner. Specifically, it appears that the Massachusetts Udall '76 Committee extinguished debts to two corporations by settling at an amount below the original debt and did not show the Commission whether the settlement was commercially reasonable. We have numbered this matter MUR 993. Please refer to this number in all future correspondence.

Under the Act, you have an opportunity to demonstrate that no action should be taken against your Committee. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification. If no response is received, the Commission may take further action based on the information at hand.

32040323799

If you have any questions, please contact Frances B. Hagan, the staff member assigned to this matter, at (202) 523-4060.

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

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

Sincerely,

William C. Oldaker
General Counsel

cc: Honorable Morris K. Udall
Mr. Stanley Kurz, Treasurer
Udall '76-Committee

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Vivian Sue Molina
Treasurer
Massachusetts Udall '76 Committee
95 Appleton Street
Boston, Massachusetts 02116

Re: MUR 993

Dear Ms. Molina:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that your Committee may have violated § 434(b)(12) of the Federal Election Campaign Act of 1971, as amended, ("the Act"), and 11 C.F.R. § 114.10(c). These sections of the Act and Regulations require disclosure of debts until they are extinguished, along with a statement showing that the debt was settled in a commercially reasonable manner. Specifically, it appears that the Massachusetts Udall '76 Committee extinguished debts to two corporations by settling at an amount below the original debt and did not show the Commission whether the settlement was commercially reasonable. We have numbered this matter MUR 993. Please refer to this number in all future correspondence.

Under the Act, you have an opportunity to demonstrate that no action should be taken against your Committee. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification. If no response is received, the Commission may take further action based on the information at hand.

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If you have any questions, please contact Frances B. Hagan, the staff member assigned to this matter, at (202) 523-4060.

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

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

Sincerely,

William C. Oldaker
General Counsel

cc: Honorable Morris K. Udall
Mr. Stanley Kurz, Treasurer
Udall '76 Committee -

82040323802

fh



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 18, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Stanley Kurz, Treasurer
Udall '76 Committee
122 East 42nd Street
New York, New York 10017

Re: MUR 993

Dear Mr. Kurz:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that your committee, through the actions of twelve state affiliates acting as agents, may have violated §§ 432, 433, 434, 437b and 441b(a) of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specific violations are described in the attached letters to individual state treasurers. The National Committee is liable for the actions of its agents, the state affiliate committees. We have numbered this matter MUR 993. Please refer to this number in all future correspondence.

Under the Act, you have an opportunity to demonstrate that no action should be taken against your committee. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification. If no response is received, the Commission may take further action based on the information at hand. If you have any questions, please contact Frances B. Hagan, the staff member assigned to this matter, at (202) 523-4060.

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- ① **SENDER:** Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).

- Show to whom and date delivered..... 0
- Show to whom, date, and address of delivery..... 0
- RESTRICTED DELIVERY**
Show to whom and date delivered..... 0
- RESTRICTED DELIVERY**
Show to whom, date, and address of delivery. \$.....
(CONSULT POSTMASTER FOR FEES)

② **ARTICLE ADDRESSED TO:**

Stanley Kury
W Hall 76 Berts.

③ **ARTICLE DESCRIPTION:**

REGISTERED NO. | CERTIFIED NO. | INSURED NO.

7-11-77 | 943254 |

(Always obtain signature of addressee or agent)

④ Have I received the article described above.

SIGNATURE Addressee Authorized agent

7-11-77
Kury

DATE OF DELIVERY

POSTMARK

⑤ **ADDRESS** (Complete only if requested)

⑥ **UNABLE TO DELIVER BECAUSE:**

CLERK'S
INITIALS

MUR 993 FBH

PS Form 3811, Apr. 1977 RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

1. SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).
- Show to whom and date delivered _____
 - Show to whom, date, and address of delivery _____
 - RESTRICTED DELIVERY
Show to whom and date delivered _____
 - RESTRICTED DELIVERY
Show to whom, date, and address of delivery _____
(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO: *re: CA Udal*
Stanley Key

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	943736	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE Addressee Authorized agent

[Signature]

DATE OF DELIVERY
11/14

POSTMARK

ADDRESS (Complete only if requested)

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6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Stanley Kurz, Treasurer
Udall '76 Committee
122 East 42nd Street
New York, New York 10017

Re: MUR 993

Dear Mr. Kurz:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that your committee, through the actions of twelve state affiliates acting as agents, may have violated §§ 432, 433, 434, 437b and 441b(a) of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specific violations are described in the attached letters to individual state treasurers. The National Committee is liable for the actions of its agents, the state affiliate committees. We have numbered this matter MUR 993. Please refer to this number in all future correspondence.

Under the Act, you have an opportunity to demonstrate that no action should be taken against your committee. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification. If no response is received, the Commission may take further action based on the information at hand. If you have any questions, please contact Frances B. Hagan, the staff member assigned to this matter, at (202) 523-4060.

82040323907

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(3)(B) unless you notify the Commission in writing that you wish the investigation to be made public. If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,

William C. Oldaker
General Counsel

cc: Honorable Morris K. Udall

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 18, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Lawrence R. Horwitz
Treasurer
Michigan Udall for President Committee
47 14th Avenue
San Francisco, California 94118

Re: MUR 993

Dear Mr. Horwitz:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that your committee may have violated the following sections of the Federal Election Campaign Act of 1971, as amended, ("the Act"): § 432(d) for failure to provide adequate documentation for expenditures; and § 434(b)(9) for failure to itemize as required expenditures to payees aggregating in excess of \$100 and totaling \$6,158.55. We have numbered this matter MUR 993. Please refer to this number in all future correspondence.

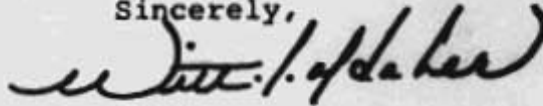
Under the Act, you have an opportunity to demonstrate that no action should be taken against your committee. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification. If no response is received, the Commission may take further action based on the information at hand. If you have any questions, please contact Frances B. Hagan, the staff member assigned to this matter, at (202) 523-4060.

82040323809

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(3)(B) unless you notify the Commission in writing that you wish the investigation to be made public. If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

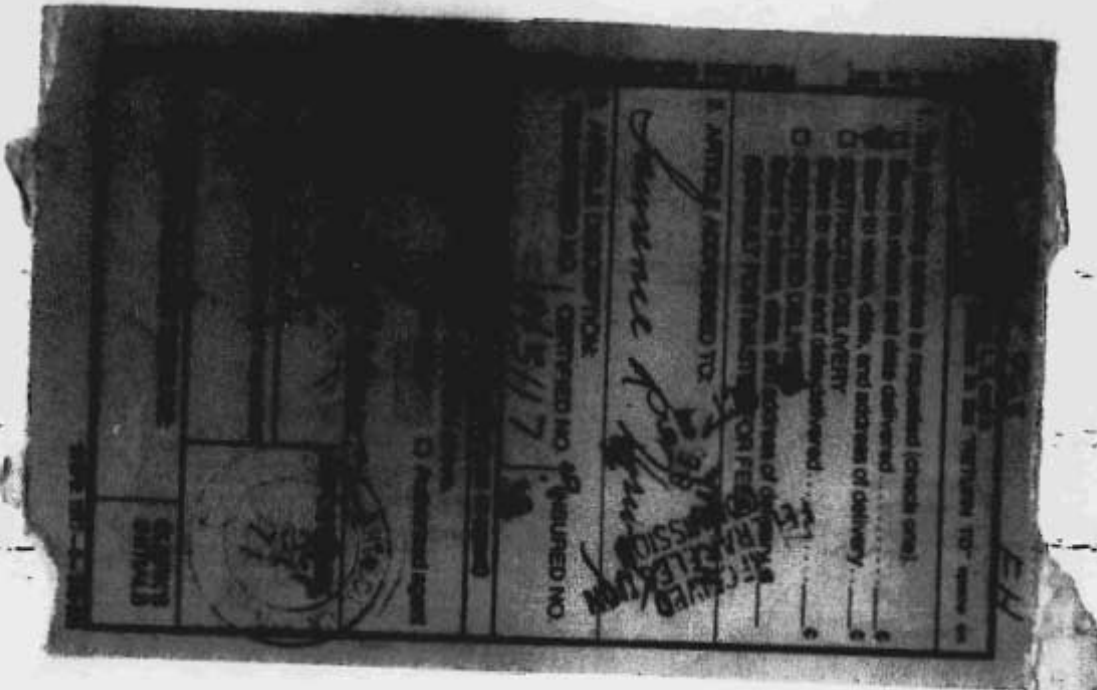
Sincerely,



William C. Oldaker
General Counsel

cc: Honorable Morris K. Udall
Mr. Stanley Kurz, Treasurer
Udall '76 Committee

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Lawrence R. Horwitz
Treasurer
Michigan Udall for President Committee
47 14th Avenue
San Francisco, California 94118

Re: MUR 993

Dear Mr. Horwitz:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that your committee may have violated the following sections of the Federal Election Campaign Act of 1971, as amended, ("the Act"): § 432(d) for failure to provide adequate documentation for expenditures; and § 434(b)(9) for failure to itemize as required expenditures to payees aggregating in excess of \$100 and totaling \$6,158.55. We have numbered this matter MUR 993. Please refer to this number in all future correspondence.

Under the Act, you have an opportunity to demonstrate that no action should be taken against your committee. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

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Sincerely,

William C. Oldaker
General Counsel

cc: Honorable Morris K. Udall
Mr. Stanley Kurz, Treasurer
Udall '76 Committee

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 18, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Henry J. Dane
Treasurer
Udall '76 Massachusetts
Special Events Committee
Post Office Box 540
91 Main Street
Concord, Massachusetts 01742

Re: MUR 993

Dear Mr. Dane:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that your committee may have violated § 433 of the Federal Election Campaign Act of 1971, as amended, ("the Act"), as stated in 11 C.F.R. § 102.12(a)(1). These sections of the Act and Regulations require that the Committee be authorized in writing by the candidate. It appears that your Committee was not so authorized. We have numbered this matter MUR 993. Please refer to this number in all future correspondence.

Under the Act, you have an opportunity to demonstrate that no action should be taken against your committee. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification. If no response is received, the Commission may take further action based on the information at hand. If you have any questions, please contact Frances B. Hagan, the staff member assigned to this matter, at (202) 523-4060.

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Sincerely,

William C. Oldaker
General Counsel

cc: Honorable Morris K. Udall
Mr. Stanley Kurz, Treasurer
Udall '76 Committee

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1. ARTICLE ADDRESSED TO: <i>Thos. Speer</i>		2. ARTICLE DESCRIPTION: REGISTERED NO. <i>945116</i> CERTIFIED NO. INSURED NO.	
3. RESTRICTED DELIVERY <input type="checkbox"/>		4. RESTRICTED DELIVERY <input type="checkbox"/>	
5. REGISTERED MAIL <input type="checkbox"/>		6. REGISTERED MAIL <input type="checkbox"/>	

Handwritten notes and stamps:
 - "CONCEPT" stamp
 - "945116" handwritten number
 - "1992" handwritten number
 - "Udall '76" handwritten text



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Henry J. Dane
Treasurer
Udall '76 Massachusetts
Special Events Committee
Post Office Box 540
91 Main Street
Concord, Massachusetts 01742

Re: MUR 993

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Sincerely,

William C. Oldaker
General Counsel

cc: Honorable Morris K. Udall
Mr. Stanley Kurz, Treasurer
Udall '76 Committee

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fu



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 18, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. J. William Heckman
Treasurer
Udall '76 California Committee
1731 P Street, N.W.
Washington, D.C. 20036

Re: MUR 993

Dear Mr. Heckman:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that your committee may have violated the following sections of the Federal Election Campaign Act of 1971, as amended, ("the Act"): § 432(d) for failure to provide adequate documentation for expenditures; § 434(b)(9) for failure to itemize certain expenditures aggregating in excess of \$100 within a calendar year; § 434(b)(12) for failure to report debts as required and failure to submit debt settlement statements; and § 441b(a) for apparently accepting a corporate contribution in the form of a reduced purchase price for office paper. We have numbered this matter MUR 993. Please refer to this number in all future correspondence.

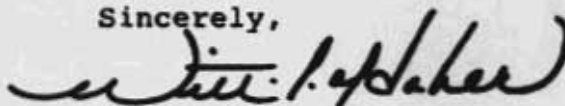
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Sincerely,



William C. Oldaker
General Counsel

cc: Honorable Morris K. Udall
Mr. Stanley Kurz, Treasurer
Udall '76 Committee

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. J. William Heckman
Treasurer
Udall '76 California Committee
1731 P Street, N.W.
Washington, D.C. 20036

Re: MUR 993

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Sincerely,

William C. Oldaker
General Counsel

cc: Honorable Morris K. Udall
Mr. Stanley Kurz, Treasurer
Udall '76 Committee

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 18, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Calvin H. Udall
Chairman
Udall '76 Committee - Arizona
1700 First National Bank Building
100 West Washington Street
Phoenix, Arizona 85003

Re: MUR 993

Dear Mr. Udall:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that your committee may have violated § 434(b)(8) and (11) of the Federal Election Campaign Act of 1971, as amended, ("the Act"). This section of the Act requires that total receipts and expenditures be reported. Specifically, it appears that the Udall '76 Committee - Arizona overstated receipt and expenditure totals by \$15,251.77 and has not accurately amended its reports. We have numbered this matter MUR 993. Please refer to this number in all future correspondence.

Under the Act, you have an opportunity to demonstrate that no action should be taken against your committee. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

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82040323821

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(3)(B) unless you notify the Commission in writing that you wish the investigation to be made public. If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,

William C. Oldaker
General Counsel

cc: Honorable Morris K. Udall
Mr. Stanley Kurz, Treasurer
Udall '76 Committee

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1. The following services to registered letter carriers are provided by the U.S. Postal Service:

Show to whom and date delivered

Show to whom, date, and address of delivery

RESTRICTED DELIVERY

Show to whom and date delivered

RESTRICTED DELIVERY

Show to whom, date, and address of delivery

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO: *Morris K. Udall*

3. ARTICLE DESCRIPTION: REGISTERED NO. *943125* INSURED NO.

4. I have received the article described above.

SIGNATURE *[Signature]* Address Authorized agent

5. I have received the article described above.

SIGNATURE *[Signature]* Address Authorized agent

6. I have received the article described above.

SIGNATURE *[Signature]* Address Authorized agent

7. I have received the article described above.

SIGNATURE *[Signature]* Address Authorized agent

8. I have received the article described above.

SIGNATURE *[Signature]* Address Authorized agent

PS Form 3811, Apr. 1977 RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Calvin H. Udall
Chairman
Udall '76 Committee - Arizona
1700 First National Bank Building
100 West Washington Street
Phoenix, Arizona 85003

Re: MUR 993

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Sincerely,

William C. Oldaker
General Counsel

cc: Honorable Morris K. Udall
Mr. Stanley Kurz, Treasurer
Udall '76 Committee

82040323824



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 18, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Charles K. Bowyer
Treasurer
New Mexico Udall '76 Committee
6801 Prairie Road, N.E.
Apartment #501
Albuquerque, New Mexico 87109

Re: MUR 993

Dear Mr. Bowyer:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found ~~reason to believe~~ that your committee may have violated the following sections of the Federal Election Campaign Act of 1971, as amended, ("the Act"): § 432(d) for failure to provide adequate documentation for expenditures; and § 434(b)(2) for failure to itemize receipts aggregating in excess of \$100 totaling \$3,757.20. We have numbered this matter MUR 993. Please refer to this number in all future correspondence.

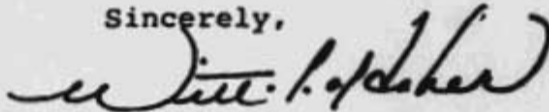
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Sincerely,



William C. Oldaker
General Counsel

cc: Honorable Morris K. Udall
Mr. Stanley Kurz, Treasurer
Udall '76 Committee

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Charles K. Bowyer
Treasurer
New Mexico Udall '76 Committee
6801 Prairie Road, N.E.
Apartment #501
Albuquerque, New Mexico 87109

Re: MUR 993

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Sincerely,

William C. Oldaker
General Counsel

cc: Honorable Morris K. Udall
Mr. Stanley Kurz, Treasurer
Udall '76 Committee

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 18, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Matthew Lawlor
Treasurer
New York Udall '76 Committee
36 East 64th Street
New York, New York 10021

Dear Mr. Lawlor:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that your committee may have violated section 434(b)(2) of the Federal Election Campaign Act of 1971, as amended ("the Act") and 11 C.F.R. § 104.3(a)(1). Specifically, it appears that your committee failed to itemize contributions totaling \$3,504.00 and failed to disclose an in-kind receipt of \$900. We have numbered this matter MUR 993. Please refer to this number in all future correspondence.

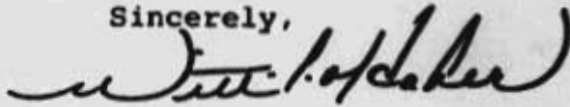
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82040323829

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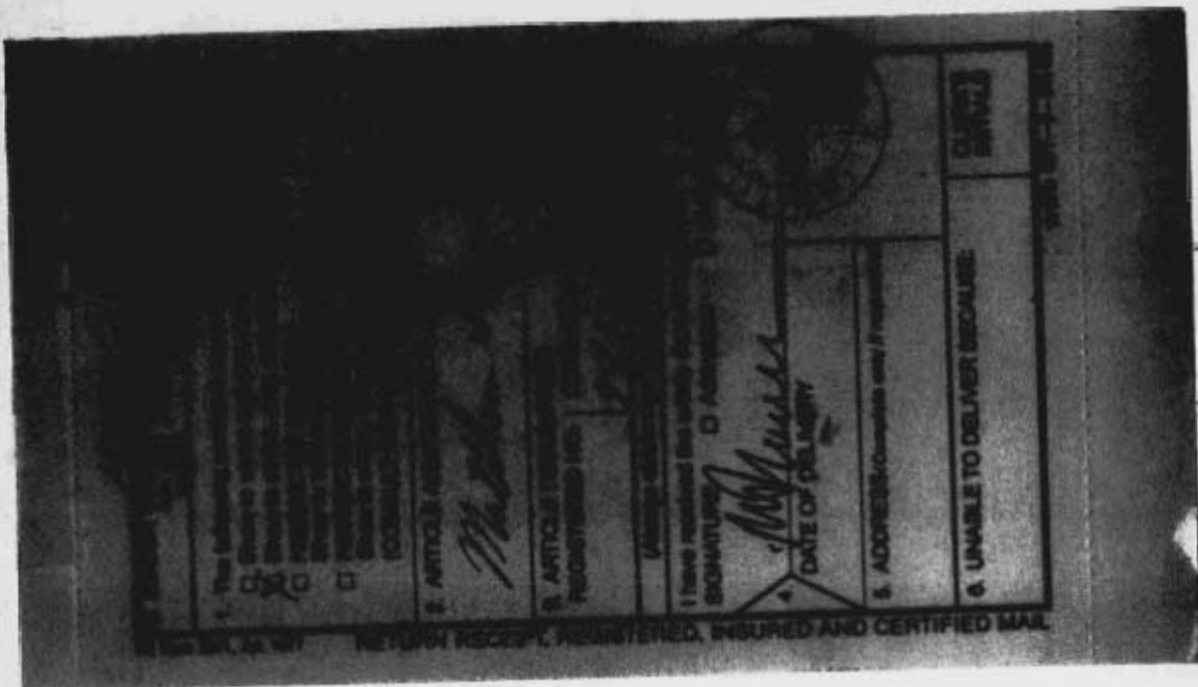
Sincerely,



William C. Oldaker
General Counsel

cc: Honorable Morris K. Udall
Mr. Stanley Kurz, Treasurer
Udall '76 Committee

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1. This delivery is made to the addressee at the address shown on the envelope. If the addressee is not available, the carrier will attempt to deliver to the next address on the envelope. If delivery is made to a person other than the addressee, the carrier will sign the receipt for the person to whom delivery is made. If delivery is made to a person other than the addressee, the carrier will sign the receipt for the person to whom delivery is made.

2. ARTICLE REGISTERED

3. ARTICLE REGISTERED AND INSURED

4. I have received this delivery for the addressee. SIGNATURE: *[Signature]* DATE OF DELIVERY: *[Date]*

5. ADDRESS/COMMUNION ONLY PREVIOUS

6. UNABLE TO DELIVER BECAUSE: *[Blank]*

7. RETURN RECEIPT FOR REGISTERED, INSURED AND CERTIFIED MAIL



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Matthew Lawlor
Treasurer
New York Udall '76 Committee
36 East 64th Street
New York, New York 10021

Dear Mr. Lawlor:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that your committee may have violated section 434(b)(2) of the Federal Election Campaign Act of 1971, as amended ("the Act") and 11 C.F.R. § 104.3(a)(1). Specifically, it appears that your committee failed to itemize contributions totaling \$3,504.00 and failed to disclose an in-kind receipt of \$900. We have numbered this matter MUR 993. Please refer to this number in all future correspondence.

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Sincerely,

William C. Oldaker
General Counsel

cc: Honorable Morris K. Udall
Mr. Stanley Kurz, Treasurer
Udall '76 Committee

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 18, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. M. F. Ludowese
Treasurer
Ohio Udall '76 Committee
1610 Morgan
Wooster, Ohio 44691

Re: MUR 993

Dear Mr. Ludowese:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that your committee may have violated the following sections of the Federal Election Campaign Act of 1971, as amended ("the Act"): § 432(c)(1) for failure to keep detailed records of receipts for transfers-in totaling \$59,949.49; § 432(d) for failure to provide adequate documentation for expenditures; and § 434 (b)(9) for failure to itemize expenditures aggregating in excess of \$100 totaling \$15,304.28. We have numbered this matter MUR 993. Please refer to this number in all future correspondence.

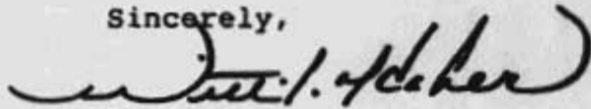
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Sincerely,



William C. Oldaker
General Counsel

cc: Honorable Morris K. Udall
Mr. Stanley Kurz, Treasurer
Udall '76 Committee

8 2 0 4 0 3 2 3 8 3 4





FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. M. F. Ludowese
Treasurer
Ohio Udall '76 Committee
1610 Morgan
Wooster, Ohio 44691

Re: MUR 993

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The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification. If no response is received, the Commission may take further action based on the information at hand. If you have any questions, please contact Frances B. Hagan, the staff member assigned to this matter, at (202) 523-4060.

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This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(3)(B) unless you notify the Commission in writing that you wish the investigation to be made public. If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,

William C. Oldaker
General Counsel

cc: Honorable Morris R. Udall
Mr. Stanley Kurz, Treasurer
Udall '76 Committee

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 18, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Thomas C. McCarthy
Treasurer
Washington Citizens for Udall '76
10210 N.E. 8th
Bellevue, Washington 98004

Re: MUR 993

Dear Mr. McCarthy:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that your committee may have violated the following sections of the Federal Election Campaign Act of 1971, as amended, ("the Act"): § 432(c) and (d) and 11 C.F.R. § 104.12(b)(1) for failure to provide adequate records for audit, including bank records between December 1, 1975 and February 29, 1976; § 441b(a) for apparently accepting a corporate contribution in the form of a reduced printing cost; § 432(d) and 11 C.F.R. § 102.9(c)(4) and (e) for failure to retain adequate documentation for expenditures. We have numbered this matter MUR 993. Please refer to this number in all future correspondence.

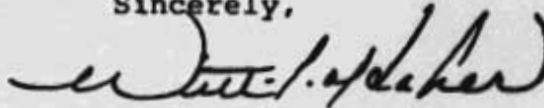
Under the Act, you have an opportunity to demonstrate that no action should be taken against your committee. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification. If no response is received, the Commission may take further action based on the information at hand. If you have any questions, please contact Frances B. Hagan, the staff member assigned to this matter, at (202) 523-4060.

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This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(3)(B) unless you notify the Commission in writing that you wish the investigation to be made public. If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,



William C. Oldaker
General Counsel

cc: Honorable Morris K. Udall
Mr. Stanley Kurz, Treasurer
Udall '76 Committee

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Thomas C. McCarthy
Treasurer
Washington Citizens for Udall '76
10210 N.E. 8th
Bellevue, Washington 98004

Re: MUR 993

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Sincerely,

William C. Oldaker
General Counsel

cc: Honorable Morris K. Udall
Mr. Stanley Kurz, Treasurer
Udall '76 Committee

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 18, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Erik Mark Brown
Treasurer
Pennsylvania Udall '76 Committee
4222 Osage Avenue
Philadelphia, Pennsylvania 19104

Re: MUR 993

Dear Mr. Brown:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that your committee may have violated the following sections of the Federal Election Campaign Act of 1971, as amended ("the Act"): § 432(d) for failure to retain adequate documentation for expenditures; § 434(b)(9) for failure to itemize expenditures to payees in excess of \$100 totaling \$19,721.87; § 437b(b) and 11 C.F.R. § 102.10 by making expenditures payable "to cash," each in excess of \$100, apparently for purposes other than replenishing a petty cash fund. We have numbered this matter MUR 993. Please refer to this number in all future correspondence.

Under the Act, you have an opportunity to demonstrate that no action should be taken against your committee. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

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Sincerely,

William C. Oldaker

William C. Oldaker
General Counsel

cc: Honorable Morris K. Udall
Mr. Stanley Kurz, Treasurer
Udall '76 Committee

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1. The following statement is true and correct: <input type="checkbox"/> I have no objection to the mailing of this article. <input checked="" type="checkbox"/> I have no objection to the mailing of this article, but I reserve the right to be notified if the article is not delivered. <input type="checkbox"/> I have no objection to the mailing of this article, but I reserve the right to be notified if the article is not delivered and I request that you advise me of the date of delivery. <input type="checkbox"/> I have no objection to the mailing of this article, but I reserve the right to be notified if the article is not delivered and I request that you advise me of the date of delivery. (CONSULT POSTMASTER)	
2. ARTICLE ADDRESS: <i>Erin M. ...</i>	
3. ARTICLE DESCRIPTION: REGISTERED NO. <i>143120</i>	
I have received the article described above. SIGNATURE: <input type="checkbox"/> Addressee <input checked="" type="checkbox"/> Postmaster <i>Erin M. ...</i>	
DATE OF DELIVERY <i>OCT 23 1975</i>	POSTAGE FEES <i>8</i>
6. UNABLE TO DELIVER REASON:	

75 Feb 297, 4c 1971 RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Erik Mark Brown
Treasurer
Pennsylvania Udall '76 Committee
4222 Osage Avenue
Philadelphia, Pennsylvania 19104

Re: MUR 993

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The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification. If no response is received, the Commission may take further action based on the information at hand. If you have any questions, please contact Frances B. Hagan, the staff member assigned to this matter, at (202) 523-4060.

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This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(3)(B) unless you notify the Commission in writing that you wish the investigation to be made public. If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,

William C. Oldaker
General Counsel

cc: Honorable Morris K. Udall
Mr. Stanley Kurz, Treasurer
Udall '76 Committee

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 18, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ellen M. Kozak, Treasurer
Wisconsin Udall '76 Committee
611 N. Broadway
Milwaukee, Wisconsin 53202

Re: MUR 993

Dear Ms. Kozak:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that your Committee may have violated the following sections of the Federal Election Campaign Act of 1971, as amended, ("the Act"): § 437b(b) and 11 C.F.R. § 102.10 by making expenditures payable to "cash" each in excess of \$100, for purposes other than replenishing a petty cash fund; § 434(b)(2) for failure to itemize on reports receipts totaling \$3,432.50. We have numbered this matter MUR 993. Please refer to this number in all future correspondence.

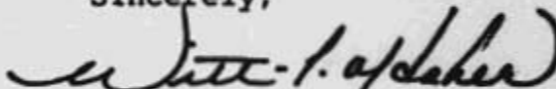
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The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification. If no response is received, the Commission may take further action based on the information at hand. If you have any questions, please contact Frances B. Hagan, the staff member assigned to this matter, at (202) 523-4060.

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This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(3)(B) unless you notify the Commission in writing that you wish the investigation to be made public. If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,



William C. Oldaker
General Counsel

cc: Honorable Morris K. Udall
Mr. Stanley Kurz, Treasurer
Udall '76 Committee

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ellen M. Kozak, Treasurer
Wisconsin Udall '76 Committee
611 N. Broadway
Milwaukee, Wisconsin 53202

Re: MUR 993

Dear Ms. Kozak:

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The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification. If no response is received, the Commission may take further action based on the information at hand. If you have any questions, please contact Frances B. Hagan, the staff member assigned to this matter, at (202) 523-4060.

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Sincerely,

William C. Oldaker
General Counsel

cc: Honorable Morris K. Udall
Mr. Stanley Kurz, Treasurer
Udall '76 Committee

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Udall '76 Committee and)
14 State Affiliates)

MUR 993

CERTIFICATION

I, Marjorie W. Emons, Recording Secretary for the Federal Election Commission's Executive Session on October 10, 1979, do hereby certify that the Commission determined by a vote of 6-0 to take the following actions in MUR 993:

1. Find REASON TO BELIEVE that the Udall '76 Committee [National] violated 2 U.S.C. §§432, 433, 434, 437b and 441b(a).
2. Find REASON TO BELIEVE that the Udall '76 Committee Arizona violated 2 U.S.C. §434(b) (8) and (11).
3. Find REASON TO BELIEVE that the Udall '76 California Committee violated the following:
 - a. 2 U.S.C. §432(d)
 - b. 2 U.S.C. §434(b) (9)
 - c. 2 U.S.C. §441b(a)
 - d. 2 U.S.C. §434(b) (12)
4. Find REASON TO BELIEVE that the Udall Maryland Campaign violated the following:
 - a. 2 U.S.C. §434(b) (4)
 - b. 2 U.S.C. §432(d)
 - c. 2 U.S.C. §434(b) (2) and (7), 11 C.F.R. §104.3(a) (1) and (2)
 - d. 2 U.S.C. §434(b) (8) and (11)
5. Find REASON TO BELIEVE that the Massachusetts Udall '76 Committee violated 2 U.S.C. §434(b) (12), 11 C.F.R. §114.10(c).

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6. Find REASON TO BELIEVE that the Udall '76 Massachusetts Special Events Committee violated 2 U.S.C. §433, as stated in 11 C.F.R. 102.12(a) (1).
7. Find REASON TO BELIEVE that the Michigan Udall for President Committee violated the following:
 - a. 2 U.S.C. §434 (b) (9)
 - b. 2 U.S.C. §432(d), 11 C.F.R. §102.9(c) and (e)
8. Find REASON TO BELIEVE that the New Mexico Udall '76 Committee violated the following:
 - a. 2 U.S.C. §432(d), 11 C.F.R. §102.9(c) (4) and (e)
 - b. 2 U.S.C. §434 (b) (2)
9. Find REASON TO BELIEVE that the New York Udall '76 Committee violated the following:
 - a. 2 U.S.C. §434 (b) (2)
 - b. 2 U.S.C. §434 (b) (2), as stated in 11 C.F.R. §104.3(a) (1)
10. Find REASON TO BELIEVE that Udall '76 Committee - Ohio violated the following:
 - a. 2 U.S.C. §432(c) (1)
 - b. 2 U.S.C. §432(d), 11 C.F.R. §102.9(c) (4) and (e)
 - c. 2 U.S.C. §434 (b) (9)
11. Find REASON TO BELIEVE that the Pennsylvania Udall '76 Committee violated the following:
 - a. 2 U.S.C. §432(d), 11 C.F.R. §102.9(c) (4) and (e)
 - b. 2 U.S.C. §434 (b) (9)
 - c. 2 U.S.C. §437b(b), 11 C.F.R. §102.10
12. Find REASON TO BELIEVE that the Washington Citizens for Udall '76 Committee violated the following:
 - a. 2 U.S.C. §432(d), 11 C.F.R. 104.12(b) (1)
 - b. 2 U.S.C. §441b(a)
 - c. 2 U.S.C. §432 (d), 11 C.F.R. §102.9(c) (4) and (e)
 - d. 2 U.S.C. §434 (b) (9)
 - e. 2 U.S.C. §434 (b) (12), 11 C.F.R. §104.1(a) (1)

(Continued)

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13. Find REASON TO BELIEVE that the Wisconsin '76 Committee violated the following:

- a. 2 U.S.C. §437b(b), 11 C.F.R. §102.10
- b. 2 U.S.C. §434(b) (12)

Attest:

10/12/79

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Udall '76 Committee and)
14 State Affiliates)

MUR 993

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on October 2, 1979, the Commission determined by a vote of 4-0 to adopt the following recommendations, as set forth in the First General Counsel's Report dated September 28, 1979, regarding the above-captioned matter:

1. Find REASON TO BELIEVE that the Udall '76 Committee [National] violated 2 U.S.C. §§ 432, 433, 434, 437b and 441b(a).
2. Find REASON TO BELIEVE that the Udall '76 Committee Arizona violated 2 U.S.C. §434(b) (8) and (11).
3. Find REASON TO BELIEVE that the Udall '76 California Committee violated the following:
 - a. 2 U.S.C. § 432(d)
 - b. 2 U.S.C. § 434(b) (9)
 - c. 2 U.S.C. § 441b(a)
 - d. 2 U.S.C. § 434(b) (12)
4. Find REASON TO BELIEVE that the Udall Maryland Campaign violated the following:
 - a. 2 U.S.C. § 434(b) (4)
 - b. 2 U.S.C. § 432(d)
 - c. 2 U.S.C. § 434(b) (2) and (7),
11 C.F.R. § 104.3(a) (1) and (2)
 - d. 2 U.S.C. § 434(b) (8) and (11)

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5. Find REASON TO BELIEVE that the Massachusetts Udall '76 Committee violated 2 U.S.C. § 434(b)(12), 11 C.F.R. § 114.10(c).
6. Find REASON TO BELIEVE that the Udall '76 Massachusetts Special Events Committee violated 2 U.S.C. § 433, as stated in 11 C.F.R. 102.12(a)(1).
7. Find REASON TO BELIEVE that the Michigan Udall for President Committee violated the following:
 - a. 2 U.S.C. § 434(b)(9)
 - b. 2 U.S.C. § 432(d),
11 C.F.R. § 102.9(c) and (e)
8. Find REASON TO BELIEVE that the New Mexico Udall '76 Committee violated the following:
 - a. 2 U.S.C. § 432(d),
11 C.F.R. § 102.9(c)(4) and (e)
 - b. 2 U.S.C. § 434(b)(12)
9. Find REASON TO BELIEVE that the New York Udall '76 Committee violated the following:
 - a. 2 U.S.C. § 434(b)(2)
 - b. 2 U.S.C. § 434(b)(2), as stated
in 11 C.F.R. § 104.3(a)(1)
10. Find REASON TO BELIEVE that Udall '76 Committee - Ohio violated the following:
 - a. 2 U.S.C. § 432(c)(1)
 - b. 2 U.S.C. § 432(d),
11 C.F.R. § 102.9(c)(4) and (e)
 - c. 2 U.S.C. § 434(b)(9)

(Continued)

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11. Find REASON TO BELIEVE that the Pennsylvania Udall '76 Committee violated the following:
- a. 2 U.S.C. § 432(d),
11 C.F.R. § 102.9(c)(4) and (e)
 - b. 2 U.S.C. § 434(b)(9)
 - c. 2 U.S.C. § 437b(b),
11 C.F.R. § 102.10
12. Find REASON TO BELIEVE that the Washington Citizens for Udall '76 Committee violated the following:
- a. 2 U.S.C. § 432(d),
11 C.F.R. § 104.12(b)(1)
 - b. 2 U.S.C. § 441b(a)
 - c. 2 U.S.C. § 432(d),
11 C.F.R. § 102.9(c)(4) and (e)
 - d. 2 U.S.C. § 434(b)(9)
 - e. 2 U.S.C. § 434(b)(12),
11 C.F.R. § 104.1(a)(1)
13. Find REASON TO BELIEVE that the Wisconsin '76 Committee violated the following:
- a. 2 U.S.C. § 437b(b),
11 C.F.R. § 102.10
 - b. 2 U.S.C. § 434(b)(12)

Voting for this determination were Commissioners Friedersdorf, Harris, McGarry, and Reiche.

Attest:

10/2/79
Date

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

Received in Office of the Commission Secretary: 9-28-79, 10:15
Circulated on 48 hour vote basis: 9-28-79, 2:00

82040323854

September 28, 1979

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 993

Please have the attached First GC Report on MUR 993 distributed to the Commission on a 48 hour tally basis.

Thank=you.

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FEDERAL ELECTION COMMISSION

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL
BY OGC TO COMMISSION 9-28-79

MUR NO. 993
STAFF MEMBER(S) _____

Hagan/Weissenborn

SOURCE OF MUR: INTERNALLY GENERATED
RESPONDENT'S NAME: Udall '76 Committee and 14 State Affiliates

RELEVANT STATUTE: 2 U.S.C. §§ 432, 433, 434, 437b, 441b

INTERNAL REPORTS CHECKED: Audit Report

FEDERAL AGENCIES CHECKED:

GENERATION OF MATTER

This matter was referred to the Office of General Counsel by the Audit Division as a result of its audit of the Udall '76 Committee and its state affiliates. (See Attachment)

SUMMARY OF ALLEGATIONS

1. The Udall '76 Committee violated 2 U.S.C. §§ 432, 433, 434, 437b and 441b through the actions of its state affiliates.
2. The following Udall '76 state affiliates violated 2 U.S.C. § 432(d) and 11 C.F.R. § 102.9(c) and (e) by failing to retain adequate documentation for expenditures:

California
Maryland
Michigan
New Mexico

Ohio
Pennsylvania
Washington

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COMMUNICATIONS SECTION

3. The following Udall '76 Committee affiliates violated 2 U.S.C. § 434(b)(9) by failing to disclose expenditures as required:

California	Pennsylvania
Michigan	Washington
Ohio	

4. The following Udall '76 Committee affiliates violated 2 U.S.C. § 434(b)(2)(4) and (7) by failing to disclose receipts as required:

Maryland	New York
New Mexico	Wisconsin

5. The California and Washington affiliates of the Udall '76 Committee violated 2 U.S.C. § 434(b)(12) and 11 C.F.R. § 104.1(a)(1) by failing to disclose outstanding debts as required.
6. The California and Washington affiliates of the Udall '76 Committee violated 2 U.S.C. § 441b(a) by apparently accepting corporate contributions.
7. The Arizona and Maryland affiliates violated 2 U.S.C. § 434(b)(8) and (11) by failing to correctly disclose total receipts and expenditures as required.
8. The Ohio affiliate of the Udall '76 Committee violated 2 U.S.C. § 432(c)(1) by failing to maintain adequate records for receipts.
9. The Pennsylvania and Wisconsin affiliates of the Udall '76 Committee violated 2 U.S.C. § 437b(b) and 11 C.F.R. § 102.10 by making expenditures payable to cash in excess of \$100.
10. The Maryland affiliate violated 2 U.S.C. § 434(b)(12) and 11 C.F.R. § 114.10(c) by failing to submit a statement of debt settlement.
11. The New York affiliate violated 2 U.S.C. § 434(b)(2) as stated in 11 C.F.R. § 104.3(a)(1) by failing to report an in-kind receipt.
12. The Massachusetts Special Events Committee violated 2 U.S.C. § 433 as stated in 11 C.F.R. § 102.12(a)(1) for failing to submit the Candidate's Committee authorization statement.

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13. The Washington affiliate violated 2 U.S.C. § 432(d) as stated in 11 C.F.R. § 104.12(b)(1) by failing to present complete records for audit.

PRELIMINARY LEGAL ANALYSIS

I

2 U.S.C. § 432(c)(1) requires that a committee treasurer "keep a detailed and exact account of all contributions made to or for such committee."

Udall '76 Committee - Ohio

The audit of the Udall '76 Committee - Ohio revealed that the Committee failed to retain records listing the dates and amounts of transfers-in totaling \$59,949.49. The National Committee indicated that its transfers accounted for all but \$10,000.49 of this amount. In addition, an invitation found among the available records indicated a fundraising event with a ticket price of \$125 each. No other available records verified the fundraiser.

II

2 U.S.C. § 432(c) and (d) and 11 C.F.R. § 104.12(b)(1) require a political committee to maintain detailed records regarding all reportable matters.

Washington Citizens for Udall '76 Committee

According to the auditors, the Washington Citizens for Udall '76 Committee provided incomplete records for audit. The missing records include bank statements and deposit tickets for the period December 1, 1975, through February 29, 1976. As a result, the auditors were unable to verify reported receipts for the period of \$5,176.00 (33% of total reported dollar amount of receipts) and reported expenditures of \$5,290.48 (36% of total reported dollar amount of expenditures).

III

2 U.S.C. § 432(d) requires in part that the committee treasurer "obtain and keep a receipted bill, stating the particulars, for every expenditure made by or on behalf of a political committee in excess of \$100 in amount," and for any expenditure in a lesser amount if the aggregate amount exceeds \$100 to the same person during a calendar year. 11 C.F.R. § 102.9(c)(4) and (e)

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provides that in lieu of a receipted bill, the treasurer may keep the canceled check and the bill, invoice, or other contemporaneous memoranda, or may show evidence of best efforts to obtain the information.

The audits revealed that the seven state Committees listed below failed to provide adequate documentation for expenditures in amounts noted, or to show best efforts to obtain it. On November 15, 1978, the Commission determined that the Committees were required to obtain such documentation. Subsequent Committee submissions are included where applicable. Auditors noted that the Committees, under the aegis of the National Committee, did not attempt to reach all payees to obtain documentation, but selected for "best efforts" attempts only those vendors receiving substantial Committee expenditures.

Udall '76 California Committee

The Committee failed to provide documentation for at least 41 of 138 expenditures or for 30% of total known items requiring documentation. These 41 expenditures total \$9,440.80 or 28% of the total known dollar amount of \$33,999 requiring documentation. Subsequently, the Committee provided documents for 4 expenditures totaling \$749.81. Twenty-seven percent of known items and twenty-six percent of the known dollar amount remain undocumented.

Udall Maryland Campaign

The Committee failed to provide documentation for 21 of at least 98 expenditures or for 21% of known items requiring documentation. These 21 items total \$6,958.66 or 22% of the total known dollar amount of \$31,487.92 requiring documentation.

Michigan Udall for President Committee

The Committee failed to provide documentation for 99 of 187 expenditures or for 53% of items requiring documentation. These 99 items equal \$26,551.73 or 38% of the total dollar amount of \$69,452.37 requiring documentation.

Following the Commission's November 15, 1978, determination, the Committee submitted receipted bills or requests for information for 28 expenditures totaling \$9,531.91. Thirty-eight percent of the items and 25% of the total dollar amount remain undocumented.

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New Mexico Udall '76 Committee

The Committee failed to provide documentation for 9 of at least 36 expenditures or for 25% of total known items requiring documentation. These expenditures equal \$2,183.72 or 21% of the total known dollar amount of \$10,180.75 requiring documentation.

Udall '76 Committee - Ohio

The Committee failed to provide documentation for 75 of at least 142 expenditures or for 53% of total known items requiring documentation. These expenditures equal \$31,626.99 or 50% of the total known dollar amount of \$62,895.19 requiring documentation.

After November 15, 1978, the Committee submitted requests for information on payee responses for 8 expenditures totaling \$2,735. Forty-seven percent of items and 46% of the total dollar amount remain undocumented.

Pennsylvania Udall '76 Committee

The Committee failed to document 45 of at least 157 expenditures or 29% of total known items requiring documentation. These expenditures equal \$22,105.41 or 24% of the total known dollar amount of \$92,405.11 requiring documentation.

Subsequently, the Committee submitted copies of letters requesting information for 11 expenditures totaling \$6,905.27. Twenty-two percent of the expenditure items and 16% of the total dollar amount remain undocumented.

Washington Citizens for Udall '76

The Committee failed to document 39 of at least 52 expenditures or 75% of total known items requiring documentation. These expenditures equal \$6,959.55 or 65% of the total known dollar amount of \$10,183.41 requiring documentation.

After the Commission's determination, the Committee submitted payee confirmations for 8 expenditures totaling \$1,574.19. Sixty percent of the total expenditure items and 50% of the total dollar amount remain undocumented.

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IV

2 U.S.C. § 434(b)(8) requires that each report under this section shall disclose "the total sum of all receipts by or for such committee or candidate during the reporting period..." and § 434(b)(11) requires that "the total sum of expenditures made by such committee or candidate during the calendar year" shall be disclosed.

The auditors found that two state Committees incorrectly reported their total receipts and expenditures. Both were required by the Commission's November 15, 1978, decision to file amendments reflecting the actual receipt and expenditure totals.

Udall '76 Committee - Arizona

The audit revealed that the Committee overstated receipt and expenditure totals by \$15,251.77. The overstatement occurred when the treasurer reported contributions collected for the National Committee. These receipts did not pass through the Arizona bank account, but were reported by both the Arizona and the National Committees.

The Committee submitted an amendment which was inaccurate. Although the Committee was advised of the errors, it has not made further amendments.

Udall Maryland Campaign

The Committee reported receipts and expenditures of \$37,429.45 for the period of March 1, 1976, through March 31, 1977. The audit revealed that the reported amounts were overstated by \$1,243.33. The treasurer could not explain the difference although he marked several entries on the report as "accounting adjustments." The Committee has not filed amendments reconciling the discrepancies.

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v

2 U.S.C. § 434(b)(2) requires disclosure of "the full name and mailing address (occupation and the principal place of business, if any) of each person who has made one or more contributions to or for [a political] committee or candidate... within the calendar year in an aggregate amount or value in excess of \$100, together with the amount and date of such contributions."

2 U.S.C. § 434(b)(7) requires disclosure of "each contribution, rebate, and refund ...in excess of \$100." 2 U.S.C. § 434(b)(2) as stated in 11 C.F.R. § 104.3 (a)(1) and (2) requires "each in-kind contribution to be reported on appropriate schedules of receipts and expenditures, identified as to its nature, and listed as 'in-kind' contribution."

Udall Maryland Campaign

The auditors noted two telephone deposit refunds totaling \$1,214.22 which were not itemized as required. The Committee itemized as receipts two in-kind contributions totaling \$1,432, but failed to include them in expenditures, label them as non-cash items, or identify the nature of these receipts. The Committee has not filed amendments correcting these errors.

New Mexico Udall '76 Committee

The Committee failed to itemize 18 of 24 contributions or 75% of total items requiring itemization. These contributions total \$3,757.20 or 63% of the total dollar amount of \$5,957.20 requiring itemization. The Committee has not amended its reports.

New York Udall '76 Committee

The Committee failed to itemize 25 of 71 contributions or 35% of total items requiring itemization. These contributions total \$3,504 or 20% of the total dollar amount of \$17,280 requiring itemization.

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In addition, the Committee failed to disclose the receipt of an in-kind contribution of \$900. A contributor paid telephone deposits for the Committee on March 18, 1976, and received the telephone company's refund of April 22, 1976.

The Commission's determination of November 15, 1978, required that the Committee file an amendment disclosing the in-kind receipt. The Committee has not done so.

Wisconsin Udall '76 Committee

The Committee failed to itemize 53 of 207 contributions or 26% of total items requiring itemization. These contributions total \$3,432.50 or 18% of the total dollar amount of \$18,782.71 requiring itemization. The Committee has not amended its reports.

VI

2 U.S.C. § 434(b)(4) requires disclosure of the "name and address of each political committee...from which the reporting committee received...any transfer of funds, together with the amounts and dates of all transfers."

Udall Maryland Campaign

The Committee reported, but failed to itemize as required 5 transfers-in totaling \$7,910 received between March 19, 1976, and September 1, 1976. The Committee has not filed amendments to itemize the transfers as required by the Commission on November 15, 1978.

VII

2 U.S.C. § 434(b)(12) requires disclosure of the amount and nature of debts and obligations owed by or to the Committee, in such form as the Commission may prescribe and a continuous reporting of their debts and obligations...until such debts and obligations are extinguished, together with a statement as to the circumstances and conditions under which any such debt or obligation is extinguished and the consideration therefor."

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11 C.F.R. § 104.1(a)(1) requires in part that "each political committee registered with the Commission... shall file quarterly reports of contributions and expenditures...until-- all debts and obligations relating to that committee's Federal election activity are extinguished..."

11 C.F.R. § 114.10(c) states that "a corporation may settle or forgive a debt if the creditor has treated the outstanding debt in a commercially reasonable manner. A settlement will be considered commercially reasonable if:

- (1) The initial extension of credit was made in accordance with regulations issued pursuant to 2 U.S.C. 451 or paragraph (a);
- (2) The candidate or political committee or person has undertaken all commercially reasonable efforts to satisfy the outstanding debt; and
- (3) The corporate creditor has pursued its remedies in a manner similar in intensity to that employed by the corporation in pursuit of a non-political debtor, including lawsuits if filed in similar circumstances."

"The corporation and/or debtor must file a statement with the Commission including the initial terms of credit, the steps taken to satisfy the debt, and remedies pursued by the creditor. This statement must be filed prior to the termination of the reporting status of the debtor and the statement is subject to Commission review."

Udall '76 California Committee

The Committee's termination report filed July 10, 1976, contained 15 outstanding debts, 10 of which were subsequently paid. However, 5 of these debts totaling \$798.53 apparently remain outstanding. The auditors discovered another debt of \$810 which was not reported. Two debts to corporations require debt settlement statements to resolve them.

The Committee has not reported the disposition of these debts as required by the Commission.

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Washington Citizens for Udall '76

On its April 10, 1976, report, the Committee listed a debt of \$1,274.60 to a printing company. The debt was omitted from later reports with no indication that the debt was paid.

The Committee's July 10, 1976, termination report noted an outstanding debt of \$3,099.32. The auditors found no evidence that the debt was paid. Further, the Committee did not respond to the Commission's determination of November 15, 1978, regarding this finding.

Massachusetts Udall '76 Committee

The Committee extinguished two corporate debts at amounts below the debt incurred, but failed to submit for Commission review the required settlement statements. One debt of \$1,400.42 was settled at \$700 (half the original debt) and the other debt of \$369 was settled at \$73.80 (one-fifth the original).

On November 15, 1978, the Commission required that the Committee show whether the debts were treated in a commercially reasonable manner. The Committee has made no response.

VIII

2 U.S.C. § 434(b)(9) requires disclosure of the "identification of each person to whom expenditures have been made by [a political] committee...within the calendar year in an aggregate amount or value in excess of \$100, the amount, date and purpose of each such expenditure."

Udall '76 California Committee

The Committee failed to itemize 12 of 138 expenditures or 9% of total items requiring itemization. These expenditures represent \$3,195.60 or 9% of the total dollar amount of \$33,999 requiring itemization. The Committee has not filed amendments as required by the Commission.

Michigan Udall for President Committee

The Committee failed to itemize 15 of 82 expenditures sampled from 187 (\$69,452.37) in total expenditures requiring itemization. The 15 expenditures total \$6,158.55. The Committee has not amended its reports to itemize these expenditures.

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Udall '76 Committee - Ohio

The Committee failed to itemize 47 expenditures of at least 142 requiring itemization. These 47 items represent \$15,304.28 out of \$62,895.19 in expenditures in excess of \$100 for which records were available. The Committee has not disclosed these expenditures on an amended report.

Pennsylvania Udall '76 Committee

The Committee failed to itemize 41 of at least 157 expenditures requiring itemization. These 41 items represent \$19,721.87 out of \$92,405.11 in expenditures in excess of \$100 for which records were available. The Committee has not amended its reports.

Washington Citizens for Udall '76

The Committee failed to itemize 31 of at least 52 expenditures requiring itemization. These 31 items represent \$5,685.11 out of \$10,783.41 in expenditures in excess of \$100 for which records were available. The Committee has not amended its disclosure reports.

IX

2 U.S.C. § 441b(a) makes it "unlawful for any corporation...to make a contribution or expenditure in connection with any election to any political office... or for any candidate, political committee, or other person knowingly to accept or receive any contribution prohibited by this section."

Udall '76 California Committee

Committee records include two invoices from a corporate entity for office paper purchased for \$229.11. This price is reduced by \$80 and marked as a campaign "contribution."

On November 15, 1978, the Commission required that the Committee refund the contribution and submit the check for review. The Committee has shown no evidence that the refund was made.

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Washington Citizens for Udall '76

Committee records include an invoice from a corporate entity for printing at a cost of \$882. This amount is reduced by \$316 and labeled as a "contribution to the Udall Campaign (for your records only)."

The Commission required that the Committee refund the contribution and submit a copy of the refund check for review. The Committee has not shown evidence that it refunded the contribution.

X

2 U.S.C. § 437b(b) states that "a political committee may maintain a petty cash fund out of which it may make expenditures not in excess of \$100 to any person in connection with a single purchase or transaction."

11 C.F.R. § 102.10 states that "a check made payable to "cash" shall not be made in excess of \$100 except to replenish the petty cash fund."

Pennsylvania Udall '76 Committee

The Committee wrote 14 checks to "cash," totaling \$5,156.54, each in excess of \$100. Eleven checks had no supporting documentation; 12 were not itemized on Committee reports. The purposes noted on the checks included printing supplies, cash-on-hand, election day expenses, postage, and scheduling. Auditors found no petty cash journal to indicate a petty cash fund.

The Commission required that the Committee provide documentation for the expenditures and detail the disbursement of these funds. The Committee has not complied. These expenditures are included among the National Committee's apparently unqualified campaign expenses.

Wisconsin Udall '76 Committee

The Committee wrote 22 checks payable to "cash" totaling \$11,255, each in excess of \$100. Thirteen expenditures are inadequately supported; seven are not itemized on disclosure reports. The treasurer explained the purposes of the expenditures as postage, operating expenses, and reimbursements.

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The Commission required the Committee to file amendments itemizing the expenditures. These expenditures are included among the National Committee's apparently unqualified campaign expenses. To date, the Committee has not filed amendments as required.

XI

2 U.S.C. § 433(a) states in part that "each political committee which anticipates receiving or making expenditures... shall file with the Commission a statement of organization..." § 433(b)(2) and (11) requires that the statement of organization shall contain "the names, addresses, and relationships of affiliated or connected organizations...and such other information as shall be required by the Commission."

11 C.F.R. § 102.12(a)(1) states that "any political committee authorized by a candidate to receive contributions or make expenditures shall be authorized in writing by the candidate."

Udall '76 Massachusetts Special Events Committee

On January 17, 1975, the Committee registered with the Clerk of the House of Representatives. The Committee later transferred \$1,467.66 (32% of its total expenditures) to the National Committee. At that time, the Massachusetts Committee was not authorized in writing by the Candidate. The Commission required that the Committee be authorized on FEC Form 2. The Candidate has not filed the authorization.

* * * * *

These actions constitute violations of the Act as stated herein. We are, therefore, recommending that the Commission find reason to believe that violations occurred in each case as specified. Furthermore, as the 14 individual state affiliates acted as agents of the National Committee in furthering the Udall campaign, the National Committee is liable for their actions. Therefore, we recommend a finding of reason to believe against the Udall '76 Committee.

Recommendations

1. Find reason to believe that the Udall '76 Committee [National] violated 2 U.S.C. §§ 432, 433, 434, 437b and 441b(a).

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2. Find reason to believe that the Udall '76 Committee - Arizona violated 2 U.S.C. § 434(b)(8) and (11).
3. Find reason to believe that the Udall '76 California Committee violated the following:
 - a) 2 U.S.C. § 432(d)
 - b) 2 U.S.C. § 434(b)(9)
 - c) 2 U.S.C. § 441b(a)
 - d) 2 U.S.C. § 434(b)(12)
4. Find reason to believe that the Udall Maryland Campaign violated the following:
 - a) 2 U.S.C. § 434(b)(4)
 - b) 2 U.S.C. § 432(d)
 - c) 2 U.S.C. § 434(b)(2) and (7),
11 C.F.R. § 104.3(a)(1) and (2)
 - d) 2 U.S.C. § 434(b)(8) and (11)
5. Find reason to believe that the Massachusetts Udall '76 Committee violated the following:
 - a) 2 U.S.C. § 434(b)(12),
11 C.F.R. § 114.10(c)
6. Find reason to believe that the Udall '76 Massachusetts Special Events Committee violated 2 U.S.C. § 433, as stated in 11 C.F.R. 102.12(a)(1).
7. Find reason to believe that the Michigan Udall for President Committee violated the following:
 - a) 2 U.S.C. § 434(b)(9)
 - b) 2 U.S.C. § 432(d),
11 C.F.R. § 102.9(c) and (e).
8. Find reason to believe that the New Mexico Udall '76 Committee violated the following:
 - a) 2 U.S.C. § 432(d),
11 C.F.R. § 102.9(c)(4) and (e).
 - b) 2 U.S.C. § 434(b)(12).
9. Find reason to believe that the New York Udall '76 Committee violated the following:
 - a) 2 U.S.C. § 434(b)(2)
 - b) 2 U.S.C. § 434(b)(2), as stated in
11 C.F.R. § 104.3(a)(1).
10. Find reason to believe that Udall '76 Committee - Ohio violated the following:

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- a) 2 U.S.C. § 432(c)(1)
- b) 2 U.S.C. § 432(d),
11 C.F.R. § 102.9(c)(4) and (e)
- c) 2 U.S.C. § 434(b)(9).

11. Find reason to believe that the Pennsylvania Udall '76 Committee violated the following:

- a) 2 U.S.C. § 432(d),
11 C.F.R. § 102.9(c)(4) and (e)
- b) 2 U.S.C. § 434(b)(9)
- c) 2 U.S.C. § 437b(b),
11 C.F.R. § 102.10

12. Find reason to believe that the Washington Citizens for Udall '76 Committee violated the following:

- a) 2 U.S.C. § 432(d),
11 C.F.R. § 104.12(b)(1)
- b) 2 U.S.C. § 441b(a)
- c) 2 U.S.C. § 432(d),
11 C.F.R. § 102.9(c)(4) and (e)
- d) 2 U.S.C. § 434(b)(9)
- e) 2 U.S.C. § 434(b)(12),
11 C.F.R. § 104.1(a)(1)

13. Find reason to believe that the Wisconsin '76 Committee violated the following:

- a) 2 U.S.C. § 437b(b),
11 C.F.R. § 102.10
- b) 2 U.S.C. § 434(b)(12).

Date

William C. Oldaker
General Counsel

Attachment

Audit Report
Sample Letter

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Sample Letter - Findings will be included as appropriate
for particular state committees.



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Vivian Sue Molina
Treasurer
Massachusetts Udall '76 Committee
95 Appleton Street
Boston, Massachusetts 02116

Re: MUR 993

Dear Ms. Molina:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that your Committee may have violated § 434(b)(12) of the Federal Election Campaign Act of 1971, as amended, ("the Act"), and 11 C.F.R. § 114.10(c). These sections of the Act and Regulations require disclosure of debts until they are extinguished, along with a statement showing that the debt was settled in a commercially reasonable manner. Specifically, it appears that the Massachusetts Udall '76 Committee extinguished debts to two corporations by settling at an amount below the original debt and did not show the Commission whether the settlement was commercially reasonable. We have numbered this matter MUR 993. Please refer to this number in all future correspondence.

Under the Act, you have an opportunity to demonstrate that no action should be taken against your Committee. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification. If no response is received, the Commission may take further action based on the information at hand.

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If you have any questions, please contact Frances B. Hagan, the staff member assigned to this matter, at (202) 523-4060.

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

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

Sincerely,

William C. Oldaker
General Counsel

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FEDERAL ELECTION COMMISSION

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

REPORT OF THE AUDIT DIVISION
ON THE
UDALL '76 COMMITTEE

I. Background

This report covers an audit of the Udall '76 Committee and 27 affiliated committees undertaken by the Audit Division to determine whether there has been compliance with the provisions of The Federal Election Campaign Act of 1971, as amended ("the Act"). The audit was conducted pursuant to Section 438(a)(8) of the Act and Section 9038(a) of Chapter 96 of the Internal Revenue Code of 1954. Section 438(a)(8) of the Act directs the Commission "to make from time to time audits and field investigations with respect to reports and statements filed under the provisions of this chapter and with respect to alleged failures to file any report or statement required under the provisions of this chapter, and to give priority to auditing and field investigating of the verification for, and the receipt and use of, any payments received by a candidate under Chapter 96 of the Internal Revenue Code of 1954." Section 9038(a) of Chapter 96 states, "after each matching payment period, the Commission shall conduct a thorough examination and audit of the qualified campaign expenses of every candidate and his authorized committees who received payments under Section 9037."

The Udall '76 Committee ("the Committee") was designated as the principal campaign committee by the Honorable Morris K. Udall, and registered with the United States General Accounting Office on August 21, 1974.

Thomas Chandler, Jack Sakrison, Elias M. Romley and James Patrick Sr., were Co-Chairmen of the Committee from inception until November 26, 1975 when Stewart L. Udall was appointed National Campaign Manager and John Michael Quinn was appointed National Campaign Director. Stewart L. Udall was designated Chairman of the Committee on September 15, 1976.

Harry G. Karchmer was Treasurer of the Committee from inception until February 5, 1975 when Stanley Kurz was appointed Treasurer.

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The Udall '76 Committee is comprised of the National Committee and 30 state and local committees. Each affiliated committee had its own treasurer and filed disclosure reports separately from the National Committee.

The following 27 affiliated committees were audited:

<u>Committee</u>	<u>Appendix</u>	<u>Report Page</u>	<u>Title 26 List</u>
Alaska Udall '76 Committee			
Udall '76 Committee - Arizona	A	24	
Udall '76 California Committee	B	25	66
Colorado Udall '76 Committee			
Connecticut Udall '76 Committee			69
D. C. Committee for Udall.			70
Georgians for Udall.			
Illinois Udall '76 Committee	C	29	
Iowa Udall '76 Committee			71
Kentucky Udall '76 Committee			72
Udall Maryland Campaign.	D	30	73
Massachusetts Udall '76 Committee	E	35	75
Udall '76 Massachusetts Special Events Committee	F	38	80
Michigan Udall for President Committee.	G	39	81
Udall '76-Missouri	H	41	
Nebraska Udall for President Committee.			
New Hampshire Udall '76 Committee	I	43	88
New Jersey Udall '76 Committee	J	44	89
New Mexico Udall '76 Committee	K	45	91
New York Udall '76 Committee	L	48	92
Udall '76 Committee - Ohio	M	51	96
Oregon Udall '76 Committee	N	54	99
Pennsylvania Udall '76 Committee	O	55	100
Udall '76 South Dakota			103
Udall '76-Vermont.			
Washington Citizens for Udall '76	P	59	112
Wisconsin Udall '76 Committee	Q	63	104

Those affiliated committees with a referenced appendix have findings and conclusions which require further consideration by the Commission.

The remaining three (3) affiliated committees that were not audited received no transfers from the National Committee and had reported \$1,518.02 in combined receipts.

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The audit covers the period from January 1, 1975 through June 30, 1978. The Committee and its affiliates reported a combined beginning cash balance of \$8,465.10, total receipts (less inter-Committee transfers) of \$5,181,375.39, total expenditures (less inter-Committee transfers) of \$5,166,015.37 and ending cash of \$16,835.52 on March 31, 1978. 1/

The difference between the calculated ending cash of \$23,825.12 and reported ending cash of \$16,835.52 is \$6,989.60. This difference is composed of the following elements:

- a. Ending cash reported by affiliated state committees at termination \$ 986.51
- b. Incorrect arithmetic calculations of reported totals by affiliated state committees 3,884.73
- c. Difference between reported transfers of the National Committee and affiliated state committees 2,118.36

Difference Between Reported and Calculated Ending Cash \$6,989.60

This audit report is based on documents and working papers supporting each of its factual statements. They form part of the record upon which the Commission based its decisions on the matters in this report, and were available to Commissioners and appropriate staff for review.

II. Findings and Conclusions

A. Title II Reporting and Recordkeeping

1. Contribution Limitations

Section 441a(a)(1)(A), of Title 2, United States Code, prohibits a person from making contributions to any candidate and his authorized political committees with respect to any election for Federal office which, in the aggregate, exceed \$1,000.

Twenty (20) contributors, who had exceeded the \$1,000 contribution limitation were identified during the review of the Committee's matching fund submission and the Schedule A's filed with its disclosure reports. The total value of the excessive portion of these contributions is \$5,612.00.

1/ The Committee filed a FEC Form 3a for the second quarter of 1978.

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On November 15, 1978, the Commission determined that the Committee was required to refund the excessive contributions and submit to the Audit staff copies of both sides of the refund checks or provide an explanation to clarify the apparent excessive contributions.

To date the Committee has supplied documentation to show that refunds have been made to the 20 contributors, but have not provided evidence of negotiation of the check for six (6) of these refunds totaling \$1,612.00. The Committee has stated that difficulty in obtaining a current address, and unanswered letters account for three (3) of the incomplete transactions.

Recommendation

We recommend no further action.

2. Supporting Documentation for Expenditures

Section 432(d) of Title 2, United States Code, requires the treasurer to obtain and keep a receipted bill, stating the particulars, for every expenditure made by or on behalf of a political committee in excess of \$100, and for any such expenditure in a lesser amount if the aggregate amount of such expenditures to the same person during the calendar year exceeds \$100.

Section 102.9(c) of Title 11, Code of Federal Regulations, requires that when a receipted bill is not available, the treasurer may keep the cancelled check showing payment of the bill; and the bill, invoice or other contemporaneous memorandum of the transaction. Section 102.9(e) requires the treasurer to use his or her best efforts to obtain the required information, and keep a complete record of the efforts to do so.

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The Committee itemized expenditures totaling \$3,790,995.26 during the period January 1, 1975 through June 30, 1978. The Treasurer failed to retain a receipted bill, invoice or contemporaneous memorandum for 64 expenditures totaling \$41,495.89. However, each was supported by a cancelled check.

On November 15, 1978, the Commission determined that the Treasurer was required to obtain the documentation and submit copies for review or present evidence of his efforts to do so for our review within 30 days of notification.

The Committee has obtained documentation in the form of receipted bills, and signed letters from the payee acknowledging receipt of the check (including a brief description of the purpose of the expenditure) for 14 expenditures totaling \$5,410.46. In addition, letters were sent requesting receipts for 35 expenditures totaling \$32,107.94. This leaves 15 expenditures totaling \$3,977.49 for which no evidence of efforts to obtain the required information has been submitted.

Recommendation

We recommend that the Committee response be considered best efforts, requiring no further action.

3. Transfers Between Presidential and Congressional Principal Campaign Committees

Part 110.3(a)(2)(v) of Title 11, Code of Federal Regulations states that transfers shall not be limited between principal campaign committees of a candidate seeking nomination or election to more than one Federal office, as long as the candidate did not receive funds under 26 U.S.C. 9006 or 9037, and the limitations on contributions by persons are not exceeded by the transfer. To assure this, the contributions making up the funds transferred shall be reviewed, beginning with the last received and working back until the amount transferred is reached.

Between November 18, 1976 and December 14, 1976, the Committee received transfers totaling \$23,000.00 from the Udall Election Committee, the principal campaign committee of the Candidate's congressional campaign.

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These transfers were made for the purpose of paying Committee debts. At the time of the transfers, the Congressional Committee neither provided nor did the Presidential Committee request the identity of the contributions making up the funds transferred.

On November 15, 1978, the Commission determined that the Committee was required to obtain from the Congressional Committee the identity of the contributors whose contributions made up the funds transferred. Further, if any contributor's limitation had been exceeded, when these contributions were added to the contributions already made to the transferee Principal Campaign Committee, the value of the excessive contributions be returned to the contributor.

The Committee has obtained the contributor information from the Congressional Committee, and identified 11 contributors who had exceeded their contribution limitations. The total value of their excessive contributions totaled \$2,225.00.

The Committee has submitted documentation indicating that refunds have been made to each contributor, but has not provided evidence of negotiation of the check for seven (7) of the refunds totaling \$1,775.00.

Recommendation

We recommend that the Committee refund to the Udall Election Committee, an amount equal to those refunds issued, and not cashed by the original contributor.

4. Disclosure of Contributor's Occupation and Principal Place of Business

Section 434(b)(2) of Title 2, United States Code, requires each report to disclose the full name and mailing address (occupation and principal place of business, if any) of each person who has made one or more contributions to or for such committee within the calendar year in an aggregate amount in excess of \$100, together with the amount and date of such contributions.

The Committee did not disclose the contributor's occupation as required for 355 of the 1,396 contributors tested for the period January 1, 1975 through December 31, 1977. This represents an approximate error rate of 25% for those contributors reviewed. In addition, the Committee did not disclose the contributor's principal place of business as required for 447, or 32% of the 1,396 items.

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In an attachment to the Committee's April 1976, monthly FEC report, the Committee stated that an effort was being made to obtain the necessary information and that when received, both the master file and FEC reports would be amended.

On May 4, 1977, the Committee responded by letter to a request from the Reports Analysis Division concerning the April 10, 1977 Quarterly report of Receipts and Expenditures noting that questionnaires had been included in the solicitations, and that in some cases, second requests had been sent. The Committee felt that they had used "best efforts" to obtain the required information.

On November 15, 1978, the Commission determined that the Committee was required to obtain the missing information and file an amended disclosure report or present evidence of their efforts to obtain the missing information within 30 days of notification.

In a response to our recommendations, the Committee reiterated its opinion that a "best efforts" attempt had been made to obtain the contributor information, and again stated that all solicitations contained a questionnaire requesting contributor occupation and principal place of business, and that letters had been sent by the Committee to obtain missing information. To support this, the Committee included copies of their solicitations, and copies of 22 letters (10 responses included) sent to contributors specifically asking for their occupation and principal place of business. Though the letter stated that the 22 letters composed only a sample of the letters sent, no information was included as to additional contributors receiving letters, or total number of letters sent. Also, the Committee stated that the Udall '76 contributor master list given to the Audit Division for matching fund purposes, was the most complete source of contributor information, and if necessary should represent the Committees disclosure report amendment.

Finally, the Committee stated that "in cases where the contributor information is incomplete, we (the committee) can only assume that the contributor did not wish to comply."

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In a test of the Udall '76 contributor list as an information source, the 355 contributors lacking the requisite contributor occupation information were traced to the master list. Additional information was found for only one (1) contributor traced.

Recommendation

In consideration of the result of a recent court case regarding similar information, we recommend no further action on this matter. 1/

5. Disclosure of Transfers-In

Section 434(b)(4) of Title 2, United States Code, requires each report to disclose the name and address of each political committee from which the reporting committee received any transfer of funds, together with the amounts and dates of all transfers.

Four (4) non-affiliated committees itemized transfers-out to the Committee in a total amount of \$7,190.00 between October 22, 1975 and May 3, 1976 (see Attachment A, Page 19). The Committee did not itemize these transfers-in on any FEC disclosure report filed.

On November 15, 1978, the Commission determined that the Committee was required to determine if these transfers had been received, and to amend their disclosure reports itemizing the transfers as required.

On March 5, 1979, the Committee submitted a letter stating that three (3) of the transfers-in totaling \$5,190.00 were received and reported, but not itemized as required. The fourth (4) transfer was received, but according to Committee officials returned uncashed due to limitation questions.

Recommendation

Since the Committee filed a letter on March 5, 1979 itemizing the transfers, we recommend that no further action be taken on this matter.

1/ FEC v. Citizens For Reagan et al
NO. 78-1160 (D.D.C. March 1, 1979)

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B. Apparent Unqualified Campaign Expenses

Section 9038(b)(2) of Title 26 of the United States Code provides that if the Commission determines that any amount of any payment made to a candidate from the matching payment account was used for any purpose other than: to defray the qualified campaign expenses with respect to which such payment was made; or to repay loans the proceeds of which were used, or otherwise to restore funds (other than contributions to defray qualified campaign expenses which were received and expended) which were used, to defray qualified campaign expenses it shall notify such candidate of the amount so used, and the candidate shall pay to the Secretary or his delegate an amount equal to such amount.

Section 9032(9)(A) of Title 26 of the United States Code defines a qualified campaign expense as a purchase, payment, distribution, loan, advance, deposit, or gift of money or of anything of value incurred by a candidate, or by his authorized committee, in connection with his campaign for nomination or election; and neither the incurring or payment of which constitutes a violation of any law of the United States or the state in which the expense is incurred or paid.

1. Traffic Fines

Our review of Committee expenditure records disclosed that the Wisconsin Udall '76 Committee made expenditures for traffic fines totaling \$418.00.

On March 5, 1979, the Committee submitted a check to the Audit Division made payable to the United States Treasury for \$418.00.

Recommendation

We recommend no further action.

2. Inadequately Supported Expenditures

Our review of the National and affiliated committee's expenditures show records which consist of cancelled checks, memoranda of their efforts to contact the vendor/payee to obtain particular descriptions of the goods or services rendered, payment vouchers, expense authorizations, reimbursement authorizations, statements of debt settlements, and vendor statements of account. Expenditures totaling \$163,614.50 were not supported by sufficient documentation to establish the expenditure's connection to the campaign.

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On November 15, 1978, the Commission determined that absent a showing to the contrary, these expenditures were unqualified campaign expenses and repayable to the United States Treasury. Subsequently, in December 1978, the Commission determined that payments to vendors would be considered adequately documented if supported by a cancelled check only, thereby reducing the amount of unsupported expenditures to \$76,824.46. The Committee then obtained and submitted documentation in the form of receipted bills and letters from payees for an additional \$15,082.59 in expenditures, leaving a balance of \$61,741.87 not supported by sufficient documentation to establish the expenditure's connection to the campaign.

A detailed listing of all insufficiently documented expenditures, displayed separately by Committee, is presented in Attachments 1 through 20 (Pages 66-113).

Recommendation

We recommend that the Commission determine that expenditures totaling \$61,741.87 are unqualified campaign expenses requiring an equal amount to be repaid to the United States Treasury.

3. Allocation of State Expenditures

Section 441a(b)(1) of Title 2 of the United States Code provides that "no candidate for the Office of President of the United States who is eligible under Section 9003 of the Internal Revenue Code of 1954 (relating to condition for eligibility for payments) or under 9033 of the Internal Revenue Code of 1954 (relating to eligibility for payments) to receive payments from the Secretary of the Treasury may make expenditures in excess of -

(A) \$10,000,000, in the case of a campaign for nomination for election to such office except the aggregate of expenditures under this subparagraph in any one state shall not exceed the greater of 16 cents multiplied by the voting age population of the State or \$200,000..."

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The expenditure limitation established for the State of New Hampshire for the 1976 Primary election was \$218,200.00. The Committee reported expenditures allocated to the State of New Hampshire in the amount of \$54,070.58 for the period January 1, 1975 through June 30, 1978. The New Hampshire Udall '76 Committee, an authorized Committee of the Candidate, reported expenditures of \$158,128.60 in the State of New Hampshire. Thus, the consolidated, reported total expenditures of the Committee and its State affiliates in New Hampshire equals \$212,199.18. This amount was reflected on the Committee's FEC Schedule 3c. (Allocation of Primary Expenditures by State For a Presidential Candidate).

During the course of our audit we determined that the following Committee expenditures should have been allocated to the State of New Hampshire:

- | | | |
|----|---|----------------------|
| A. | American Express Charges
(see Attachment B, Page 20). | \$ 3,647.89 |
| B. | Concord Bank Expenditures
for the period 3/5/75-
6/30/75 (net of fundraising). | 5,265.39 |
| C. | New Hampshire Committee
itemized fundraising
expenditures between
January 28, 1976 and
February 24, 1976. | 6,665.40 |
| D. | Major Print Production
produced specifically
for the New Hampshire
election. | 1,705.04
2,457.80 |
| E. | Weston Associates (see
Attachment B, Pages 21-23). | 3,800.00
1,000.00 |
| F. | Massachusetts
Advertising Expenditures | |
| 1. | Massachusetts TV
Allocated to New
Hampshire | 5,356.28 |

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2. Massachusetts Radio 1,577.90
Allocated to New
Hampshire

Additional expenditures \$31,475.70
to be allocated to New Hampshire

Therefore, it appeared the Committee and its affiliates actually spent \$243,674.88 allocable to the State of New Hampshire, an amount which exceeds the State expenditure limitation by \$25,474.88.

On November 15, 1978, the Commission determined that absent a showing to the contrary, the amounts expended in excess of the limitation, were unqualified campaign expenses requiring an equal amount to be repaid to the United States Treasury.

The Committee submitted a letter responding to this preliminary determination as follows:

Items A, B, and C above. The Committee does not contest these determinations.

D. Major Print Production produced specifically for New Hampshire election.

The Committee stated that the material was not of satisfactory quality and was not used. (See Exhibit B, page 142). As evidence of this, the Committee submitted a letter from the New Hampshire treasurer stating that the brochures were not used, and were disposed of after the campaign. No additional evidence was submitted to support this contention. The Audit staff recommends that the Commission determine that this explanation is not sufficient to demonstrate that these expenditures should not be charged to the New Hampshire limitation.

E. Weston Associates (see Attachment B).

The Committee states that 50% of this amount should be considered fundraising. Again, no evidence such as copies of the materials purchased were submitted for review (see Exhibit B, page 142).

The Audit staff recommends that the Commission determine that this explanation is not sufficient to demonstrate that these expenditures should not be charged to the New Hampshire limitation.

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F. Massachusetts Advertising Expenditures

(1) Massachusetts TV Allocated to New Hampshire

The Committee states that the expenditures for television in the Boston area should be allocated to Maine, Vermont, New Hampshire, Connecticut, Rhode Island, and Massachusetts based on voting age population (see Exhibit B, page 142). However, with the exception of Vermont where the Candidate did not appear on the primary election ballot and Massachusetts where the majority of the expenditures have been allocated, the primary election or state convention in these states occurred approximately three to four months after the advertising was aired.

In addition, the staff allocations are based on broadcast area, and station dominant influence statistics published for the Boston area television market.

Therefore, the Audit staff recommends that the Commission reject the Committee's calculation based on voting age population.

(2) Massachusetts Radio Allocated to New Hampshire

The Committee submitted invoices totaling \$6,196.01 for radio time purchases made by New Hampshire, from stations located in Maine, Vermont, and Massachusetts. In addition, the Committee contends that if Massachusetts radio purchases are to be allocated to New Hampshire, a portion of New Hampshire radio purchases should then also be allocated to Massachusetts. *

As noted before, the Audit staff rejected the allocation of radio time purchased by New Hampshire to Maine and Vermont, due to the Candidate's absence on the Vermont ballot, the date of the Maine convention, and due to the cessation of broadcasting on the New Hampshire primary date. However, after discussion with the Office of General Counsel, it was decided that since radio time had been purchased by both the New Hampshire and Massachusetts committees, that radio purchases should be applied to the limitation of the purchasing state. Therefore, the Audit staff recommends that the Commission reject the allocation of New Hampshire radio purchases to Massachusetts, and delete the previous allocation of \$1,577.90 in Massachusetts radio time to New Hampshire.

* This argument does not apply to Television purchases, since New Hampshire television was purchased solely in the Boston market.

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In addition, the Committee submitted recalculations affecting its own expenditures to be allocated to the State of New Hampshire, and reported expenditures of the New Hampshire Udall '76 Committee. The recalculations were as follows:

Allocable Salaries

The Committee allocated \$35,803.96 in salary payments to workers in New Hampshire. The Committee contends that no allowance was made for time spent in fundraising, or exempt legal and accounting activities. Therefore, the Committee has reduced the allocated salary payment by \$8,690.69 to \$27,113.27. The Committee did not document how an individuals time spent in these activities was determined.

The Audit staff determined that the individuals involved held positions such as Administrative Director, Chairperson, New Hampshire Coordinator, etc., therefore, it is reasonable to assume that these individuals would be involved in fundraising, legal and accounting activities. The Audit staff therefore recommends that the Commission determine that the Committee's salary recalculation be accepted.

Out of State Expenditures

The Committee submitted documentation for expenditures paid for by the New Hampshire Udall '76 Committee which the Committee contends were activities conducted outside of New Hampshire, or are exempt from allocation.

The documentation totaled \$7,684.86, and consisted mainly of long distance telephone calls made from New Hampshire to out of state locations. No phone logs were submitted by the Committee to support the reallocation.

Due to lack of adequate documentation, the Audit staff determined that long distance calls made prior to February 24, 1976, the date of the New Hampshire primary, and calls made after the primary to New York and Washington, D.C., locations of Committee headquarters, should not be accepted as non-New Hampshire related. Therefore, after review of the documentation, the Audit staff recommends the acceptance of \$2,812.47 as New Hampshire expenditures allocable to other states.

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The Audit staff recommends that the Commission reject the Committee reallocation of \$4,872.39 in reported New Hampshire expenditures, as expenditures allocable to other states.

Summary of Expenditures Subject to New Hampshire Limitation

Amounts Allocated by Committee at the time of the audit	\$212,199.18
Less allocation of salaries to Legal Accounting, and Fundraising Costs	(8,690.69)
Less Expenditures paid from New Hampshire Account Allocable to Other States	(2,812.47)
Plus Amounts Contained in Items A-F above	31,475.70
Less Massachusetts Radio Previously Allocated to New Hampshire	<u>(1,577.90)</u>
Total Expenditures Allocable to the 1976 New Hampshire Primary Election	\$230,593.82
Less Limitation Established for the 1976 New Hampshire Primary Election	<u>(218,200.00)</u>
Expenditures in Excess of Limitation	<u>\$ 12,393.82</u>

Recommendation

The Audit staff recommends that expenditures totaling \$12,393.82 be considered unqualified campaign expenses and repayable to the United States Treasury.

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C. Repayment

1. Surplus Matching Fund Payment

Section 134.3(c)(2) of Title 11, Code of Federal Regulations, provides that if, on the last day of candidate eligibility there are net outstanding campaign obligations, any matching funds received thereafter may be retained for a period not exceeding 6 months after the end of the matching payment period in order to liquidate those obligations. However, as of the date when the amount or amounts of matching funds received after ineligibility equal(s) the amount of the candidate's net outstanding campaign obligations, the candidate shall be obliged to repay to the Treasury that portion of any unexpended balance remaining on that date in the candidate's accounts (less the matching payments so received), which bears the same ratio to such balance as the total amount bears to the aggregate of all contributions and matching funds deposited in all the depositories through that date.

The Commission preliminarily determined June 14, 1976, to be the day on which the Honorable Morris K. Udall's candidacy terminated for the purpose of incurring qualified campaign expenses. The Candidate was so informed by letter. On June 28, 1976, the Candidate sent a letter to the Commission which enclosed a statement attesting to the Committee's net outstanding campaign obligations as of June 14 but also stating that this submission was "not a recognition that (his) campaign is inactive for purposes of making qualified campaign expenditures under Chapter 96 of Title 26."

The statement submitted by the Candidate showed net outstanding obligations totaling \$662,700 on June 14, 1976. The amount of matching payments certified after that date equaled \$457,793.11. The Candidate has never disputed the application of June 14, 1976, as his date of ineligibility for purposes of calculating net outstanding campaign obligations.

Recommendation

Since the amount of matching payments received after the date of ineligibility never equaled the Committee's net outstanding campaign obligations on the date of ineligibility, no repayment of surplus matching funds is required.

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2. Unmatchable Contributions

Section 9038(b)(1) of Title 26 of the United States Code provides that if the Commission determines that any portion of the payments made to a candidate from the matching payment account was in excess of the aggregate amount of payments to which such candidate was entitled under Section 9034, it shall notify the candidate, and the candidate shall pay to the Secretary or his delegate an amount equal to the amount of the excess payments.

The Committee submitted a series of contributions totaling \$850.00 for matching and listed them as contributions from a single contributor. The Committee received \$250.00 in public funds for these contributions. During the audit, we found that only \$25.00 of the \$850.00 was in fact a contribution from the identified individual. The residual \$825.00 was from numerous individuals in amounts equal to or less than \$100 collected by that individual. The individual who collected the contributions transmitted the funds by check.

The individual provided the Committee a detailed accounting of the transmitted contributions, but the Committee mistakenly attributed the contributions received to the signatory of the contribution checks.

On March 5, 1979, the Committee submitted a check to the Audit Division made payable to the United States Treasury for \$225.00.

Recommendation

We recommend no further action.

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Repayment Summary

B.	1.	Traffic Violation Fines (see Page 9).	\$ 418.00
B.	2.	Insufficiently Documented Expenditures:	
		National and Affiliated Committees (see Page 9).	61,741.87
B.	3.	Expenditures in Excess of the Limitation (see Page 10).	12,393.82
C.	2.	Contribution Matched in Excess of Eligibility (see Page 17).	<u>225.00</u>
		Total Recommended Repayment	<u>\$74,778.69</u>
		Less Payments:	
B.	1.	Traffic Violations	(418.00)
C.	2.	Contribution Matched in Excess of Eligibility	<u>(225.00)</u>
		Additional Repayments Required	<u>\$74,135.69</u>

IV. Auditor's Statement

Except for the matters specifically noted in this report, and the attached appendices, the audit disclosed that the Committees conducted their activities in conformity with the Federal Election Campaign Act of 1971, as amended, and in conformity with Chapter 96 of Title 26, U.S.C., in all material aspects.

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ATTACHMENT A

SUMMARY OF TRANSFERS REPORTED TO THE
UDALL '76 COMMITTEE OR AFFILIATED COMMITTEE

<u>Reporting Committee</u>	<u>Date</u>	<u>Amount</u>
CNA District 2 PAC	5/3/76	2,000.00 **
NLI Testimonial Dinner Committee	10/22/75	150.00
People for Improvement of Education	12/5/75	40.00
* UAW Voluntary Community Action Program	3/29/76	5,000.00

* UAW V CAP records contain a cancelled check for this contribution which was deposited into the Udall '76 Fund Raising account number 020-249-5 in the American Indian National Bank on March 31, 1976.

** Returned uncashed.

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ATTACHMENT B

ITEMIZATION OF AMERICAN EXPRESS CHARGES

<u>VENDORS</u>	<u>AMOUNT</u>	<u>DATE INCURRED</u>
The New Berkshire Nashua, NH	\$ 233.01	2/13/76
Page Airways Albany, NY (Manchester Charter)	800.00	2/1/76
Ramada Inn Dover, NH	65.22	2/6/76
Ramada Inn Dover, NH	107.32	2/9/76
Grenier Aviation, Inc. Manchester, NH	732.50	2/12/76
Riverdale Inn Petersborough, NH	133.52	Before 2/26/76
Howard Johnson Nashua, NH	24.50	Before 2/26/76
Town & Country Motor Inn Gorham, NH	289.28	11/15/75
Dunfey Family Corp. Manchester, NH	243.33	11/18/75
Ramada Inn Dover, NH	92.52	11/24/75
Dunfey Manchester, NH	267.78	11/25/75
Jon Wyfred Bedford, NH	254.71	11/21/75
New Berkshire Nashua, NH	123.01	12/12/75
Town & Country Gorham, NH	186.25	11/18/75
Ramada Inn Laconia, NH	44.10	11/11/75
Daffodils Bedford, NH	<u>50.84</u>	2/23/76
Total American Express Charges to be Allocated to New Hampshire	<u>\$3,647.89</u>	

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ATTACHMENT B
UDALL '76 COMMITTEE

Payments on account of Weston Associates, Inc., to be allocated to New Hampshire.

Weston Associates, Inc., bill for production and distribution of tabloid (see Attachment B, Page 17). \$13,692.00

Payments by the New Hampshire Udall '76 Committee

<u>Date</u>	<u>Amount</u>	
11/18/75	\$ 843.00	
11/18/75	1,157.00	
11/18/75	7,000.00	
11/25/75	<u>892.00</u>	
Less: Total Payments by New Hampshire Committee		<u>(9,892.00)</u>
Payment by the Udall '76 Committee for tabloids produced and distributed by Weston Associates, Inc.		<u>\$ 3,800.00</u>

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NOV 17 1975

Udall '76 Committee
530 Seventh Street S. E.
Washington, D. C. 20003

November 13, 1975

PLEASE DETACH AND RETURN THIS STUB WITH YOUR REMITTANCE

\$ _____

DATE	ORDER NO.	DESCRIPTION	CHARGES	CREDITS	BALANCE
- BALANCE FORWARD					
10/24/75	36694	Manchester Union Leader	2,453.00		
10/24/75	36695	Concord Monitor	900.00		
10/24/75	36696	Nashua Telegraph	1,245.00		
10/24/75	36697	Laconia Citizen	247.00		
10/24/75	36698	Claremont Eagle/Times	475.00		
10/24/75	36699	Foster's Daily Democrat	891.00		
10/24/75	36700	Keene Sentinel	546.00		
10/24/75	36701	Valley News	353.00		
10/24/75	36702	Portsmouth Herald	1,006.00		
10/24/75	36704	Berlin Reporter	395.00		
10/24/75	36705	Salem Observer	181.00		
10/24/75		Production on 250M 8 tabloids @ \$20.00 per M	5,000.00		
					13,692.00

TERMS: PAYABLE NET 10-DAYS

1% PER MONTH INTEREST ON UNPAID BALANCE AFTER 30 DAYS (18% PER ANNUM)
PLEASE EXAMINE THIS INVOICE CAREFULLY (CORRECTIONS) MUST BE MADE WITHIN 15 DAYS

2,453.00
900.00
1,245.00
247.00
475.00
891.00
546.00
353.00
1,006.00
395.00
181.00
5,000.00
13,692.00

ATTACHMENT B

UDALL '76 COMMITTEE

Client's Ledger
Weston Associates, Inc.

<u>Date</u>	<u>Description</u>	<u>Amount</u>	<u>Balance</u>
2/75	Letterheads, envelopes, new release stationery for New Hampshire use	\$ 176.37	\$ 176.37
4/75	New Hampshire Time Survey flier	155.45	331.82
	News Letter Format	67.14	398.96
	Letterheads and envelopes	355.05	754.01
5/8/75	Photographs	89.85	843.86
5/8/75	News Releases	617.65	1,461.51
6/9/75	National Payment on Account	(1,000.00)	<u>461.51</u>
	Balance on 6/9/75		<u>\$ 461.51</u>

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Appendix A

UDALL '76 COMMITTEE - ARIZONA

Findings and Conclusions

A. Overstatement of Receipts and Expenditures

Section 434(b)(8) of Title 2, United States Code, provides, in part, that each report under this section shall disclose the total sum of all receipts by or for such committee or candidate during the reporting period, while Section 434(b)(11) requires that each such report disclose the total sum of expenditures made by such committee or candidate during the calendar year.

The Committee overstated its receipt and expenditure totals by \$15,251.77. These overstatements resulted from the Arizona Committee's disclosure of contributions collected on behalf of the National Udall '76 Committee. The monies collected were not deposited into the Arizona Committee's account, but were forwarded directly to the National Committee. The forwarded contributions included 19 items in excess of \$100 which were itemized on reports filed by both committees. Hence, the combination of the Committee's and the National Committee's reports show two (2) contributions from each contributor.

A Committee official explained that since the Committee had possession of the contributions, he believed it necessary to include the receipt and transfer of the contributions in the Committee's report.

On November 15, 1978, the Commission determined that the Arizona Committee was required to file a comprehensive amendment with the Udall '76 Committee deleting the appropriate contributions and transfers-out from its reports within 30 days of notification.

On March 30, 1979, the Committee filed amendments pertaining to the noted transfers, but the amendments were incorrect as filed. The Committee was notified of the errors, but corrected amendments have not been filed to date.

Recommendation

We recommend that due to the Committee's failure to file the required amendments, that the matter be referred to the Office of General Counsel for their consideration.

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Appendix B

UDALL '76 CALIFORNIA COMMITTEE

Findings and Conclusions

Pursuant to Commission directive, the Committee forwarded its records to New York where we conducted our examination. Consequently, Committee officials were not available for comment during or at the conclusion of our examination.

A. Supporting Documentation for Expenditures

Section 432(d) of Title 2, United States Code, requires, in part, the treasurer to obtain and keep a receipted bill, stating the particulars, for every expenditure made by or on behalf of a political committee in excess of \$100, and for any such expenditures in a lesser amount, if the aggregate amount of such expenditures to the same person during the calendar year exceeds \$100. Section 102.9(c)(4) and (e) of Title 11, Code of Federal Regulations, provides that when a receipted bill is not available, the treasurer may keep the cancelled check showing payment of the bill; and the bill, invoice or other contemporaneous memorandum of the transaction or use his or her best efforts to obtain the required information, and keep a complete record of the efforts to do so.

The Committee made at least 138 expenditures totaling \$33,999.00 which require supporting documentation. The Committee failed to retain a receipted bill, invoice, or contemporaneous memorandum for 41 of these totaling \$9,440.80.

On November 15, 1978, the Commission determined that the Committee was required to obtain the required documentation and submit copies for our review within 30 days. If documentation could not be obtained, the Committee was required to submit evidence of its efforts to obtain such documentation.

The Committee submitted for review documentation consisting of signed letters from payees and/or letters to the payees requesting documentation for four (4) expenditures totaling \$749.81.

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4
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3
2
3
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7

Thirty-seven expenditures totaling \$8,690.99 remain unsupported as of this date.

Recommendation

We recommend that due to the Committee's failure to obtain the required documentation, or submit evidence of a best efforts to obtain such documentation, that the matter be referred to the Office of General Counsel for their consideration.

B. Disclosure of Expenditures

Section 434(b)(9) of Title 2, United States Code, requires in part that each report shall disclose the identity of each person to whom expenditures have been made by the committee within the calendar year in an aggregate amount in excess of \$100, the amount, the date, and purpose of each such expenditure.

The Committee made at least 138 expenditures totaling \$33,999.00 which require itemization on Committee reports. A total of twelve (12) expenditures totaling \$3,195.60 were not itemized as required.

On November 15, 1978, the Commission determined that the Committee was required to file a comprehensive amendment disclosing the expenditures as required within 30 days of notification.

No amendments have been filed by the Committee.

Recommendation

We recommend that due to the Committee's failure to file amendments as required, that the matter be referred to the Office of General Counsel for their consideration.

C. Corporate Contributions

Section 441b(a) prohibits any corporation from making a contribution in connection with any primary election, or for any candidate, or political committee, or other person knowingly to accept or receive any contribution prohibited by this section.

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Committee records contain two (2) invoices supporting the purchase of \$229.11 worth of office paper from a California corporation. The invoices show a deduction of \$80.00 from the selling price, with the deduction labeled as a "contribution" to the Udall Campaign. The office of the Secretary of State confirmed that the vendor was incorporated at the time of the transaction.

On November 15, 1978, the Commission determined that the Committee was required to refund the contribution and submit a copy of both sides of the refund check to the Commission within 30 days of notification.

To date, no documentation has been submitted indicating refund of the contribution.

Recommendation

We recommend that due to Committee failure to respond as required, that the matter be referred to the Office of General Counsel for their consideration.

D. Continuous Reporting of Debts and Obligations

Section 434(b)(12) of Title 2, United States Code, requires that each report under this section shall disclose the amount and nature of debts and obligations owed by or to the committee, in such form as the Commission may prescribe and a continuous reporting of their debts and obligations after the election at such periods as the Commission may require until such debts and obligations are extinguished, together with a statement as to the circumstances and conditions under which any such debt or obligation is extinguished and the consideration therefor.

There were 15 debts reported by the Committee at termination. Ten of these debts were subsequently paid. The remaining five (5) outstanding debts totaling \$798.53 were shown on the Committee's termination report filed July 10, 1976 for which no Committee payment was found. Committee records show one (1) other debt of \$810.00 which was not reported. Two (2) of these six (6) debts are owed to corporations and no debt settlement statements have been filed with the Commission.

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On November 15, 1978, the Commission determined that the Committee was required to file a comprehensive amendment showing the disposition of the above mentioned debts within 30 days of receipt of notification.

No amendments have been filed showing the disposition of the Committee debts.

Recommendation

We recommend that due to Committee failure to file the required amendments, that the matter be referred to the Office of General Counsel for their consideration.

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Appendix C

ILLINOIS UDALL '76 COMMITTEE

Findings and Conclusions

A. No Records Presented for Audit

Section 104.12(b) of Title 11, Code of Federal Regulations requires, in part, each candidate, political committee, or other person required to file any report or statement under this subchapter to maintain records with respect to the matters to be reported which shall provide in sufficient detail the necessary information and data from which the filed reports and statements may be verified, clarified and checked for accuracy and completeness.

The entire filing history of the Committee consisted of FEC Forms 3a, for the first and second quarters of 1976, and two letters. In one letter, the Treasurer stated that the Committee collected \$1,100 in receipts and made approximately \$450 in expenditures. The other letter indicates that the Committee has terminated. There were no residual funds and all funds not spent directly by the Committee were forwarded to the National Committee. The National Committee reported transfers to the Committee totaling \$750.00 during March, 1976.

The Audit staff and the Udall '76 National Committee made several unsuccessful attempts to contact the Treasurer. As a result, we were unable to obtain the necessary records with which to verify reports and statements filed by the Committee.

On November 15, 1978, the Commission determined that the National Committee was required to obtain and submit for our review the necessary records to verify the Committee's reports of receipts and expenditures within 30 days of receipt of notification.

To date, the National Committee has been unable to contact the Illinois Udall '76 Treasurer.

Recommendation

Since the National Committee has been unsuccessful in its attempts to contact the Committee Treasurer, and since the \$750.00 transfer to the Committee has been included as a Title 26 unsupported expenditure, the Audit staff recommends that no further Committee action be required.

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Appendix D

UDALL MARYLAND CAMPAIGN

Findings and Conclusions

A. Itemization of Transfers

Section 434(b)(4) of Title 2, United States Code, requires each report under this section to disclose the name and mailing address of each political committee from which the reporting committee received any transfer of funds, together with the amounts and dates of all transfers.

The Committee received five (5) transfers totaling \$7,910.00 during the period of March 19, 1976 through September 1, 1976 which are not itemized in Committee reports. All of the transfers were included in the FEC Form 3 summary totals but were not itemized as required.

On November 15, 1978, the Commission determined that the Committee was required to file an amended disclosure report itemizing the above transfers within 30 days of notification.

To date, no amendments have been filed itemizing the five (5) transfers.

Recommendation

We recommend that due to the Committee's failure to respond as required, that the matter be referred to the Office of General Counsel for their consideration.

B. Supporting Documentation for Expenditures

Section 432(d) of Title 2, United States Code, requires the treasurer to obtain and keep a receipted bill, stating the particulars, for every expenditure made by or on behalf of a political committee in excess of \$100, and for any such expenditures in a lesser amount, if the aggregate amount of such expenditures to the same person during the calendar year exceeds \$100. Section 102.9(c)(4) and (e) of Title 11, Code of Federal Regulations, provides that when a receipted bill is not available, the treasurer may keep the cancelled check showing payment of the bill; and the bill, invoice or other contemporaneous memorandum of the transaction or use his or her best efforts to obtain the required information, and keep a complete record of the efforts to do so.

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The Committee made at least 98 expenditures totaling \$31,487.92 during the period March 1, 1976 through March 31, 1977 which required supporting documentation. The Treasurer failed to retain a receipted bill, invoice or contemporaneous memorandum for 21 of these expenditures totaling \$6,958.66. However, each expenditure was supported by a cancelled check.

On November 15, 1978, the Commission determined that the Committee was required to obtain the required supporting documentation and submit it for our review, or present evidence of their efforts to do so, within 30 days of notification.

No documentation or evidence of efforts to obtain such documentation have been submitted to the Audit staff for review.

Recommendation

We recommend that due to the Committee's failure to obtain the required documentation, or submit evidence of a best efforts attempt to obtain such documentation, that the matter be referred to the Office of General Counsel for their consideration.

C. Disclosure of Receipts

Section 434(b)(2) requires that each report shall disclose the full name and address (occupation and principal place of business, if any) of each person who has made one or more contributions to or for such committee within the calendar year in an aggregate amount in excess of \$100, together with the amount and date of such contributions.

Section 434(b)(7) of Title 2, United States Code, requires a report to disclose each contribution, rebate, and refund in excess of \$100.

Section 104.3(a)(1) and (2) of Title 11, Code of Federal Regulations, requires in part each in-kind contribution to be reported on the appropriate schedules of receipts and expenditures, identified as to its nature and listed as an "in-kind contribution".

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Refunds

The Committee received two (2) refunds totaling \$1,214.22 in September of 1976, which were not itemized in Committee reports as required. These receipts were refunds of telephone deposits.

In-Kinds

The Committee received two (2) "in-kind" contributions totaling \$1,432.00 which were itemized as receipts on Committee reports, but were neither identified as to their nature nor labelled as "non-cash".

In addition, these "in-kind" contributions were not included in Committee reports as expenditures.

On November 15, 1978, the Commission determined that the Committee was required to file a comprehensive amendment correctly itemizing the above receipts and expenditures within 30 days of notification.

To date, no amendments have been filed itemizing the noted refunds and in-kind contributions.

Recommendation

We recommend that due to the Committee's failure to file the appropriate amendments, that the matter be referred to the Office of General Counsel for their consideration.

D. Reported Receipt and Expenditure Totals

Section 434(b)(8) and (11), of Title 2, United States Code requires, in part, that each report shall disclose the total sum of all receipts and expenditures by such committee during the reporting period.

The amounts reported by the Committee for receipts and expenditures each total \$37,429.45 for the period March 1, 1976 to March 31, 1977.

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Records provided for inspection for the period indicate total receipts and total expenditures of \$36,186.12, leaving an unexplained difference of \$1,243.33. The Treasurer stated that he maintained no bank accounts other than those for which records were presented and that to his knowledge, with the exception of identified in-kind items, no contributions or expenditures were made which were not deposited in or made from a Committee depository. In addition, the Audit staff was able to match each itemized expenditure with a cancelled check.

In several instances, the Treasurer made entries on the report described only as "accounting adjustment" and in other cases, the Committee's unitemized figures are not supported by the records. The Treasurer has not maintained any records to explain how any of these apparent adjustments were calculated.

On November 15, 1978, the Commission determined that the Committee was required to review its reports and records, and submit an amended disclosure report reconciling previously filed reports with its records within 30 days of notification.

No disclosure amendments have been filed by the Committee reconciling the difference between its filed reports and committee records.

Recommendation

We recommend that due to the Committee's failure to file the appropriate amendments, that the matter be referred to the Office of General Counsel for their consideration.

E. Contributions Made in Excess of Limitations

Section 441a(a)(1)(A) of Title 2, United States Code, prohibits a person from making contributions to any candidate and his authorized political committee with respect to any election for Federal office which, in the aggregate, exceed \$1,000. Section 441a(f) of Title 2, United States Code, states, in part, that no political committee shall knowingly accept any contribution in violation of the provisions of this section.

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The Committee received contributions from a contributor totalling \$1,050.00. This total consisted of two (2) loans received on May 10 and May 12, 1976 totalling \$850 and other contributions of \$200.00. The loans remained outstanding until repaid on December 17, 1976. Contributions totaling \$600.00 had been made by the contributor to the National Committee prior to the existence of the Committee. These contributions were not aggregated by either the National Committee or the Maryland Udall Campaign.

Recommendation

Since the Committee has repaid the loan, we recommend no further action in this matter.

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Appendix E

MASSACHUSETTS UDALL '76 COMMITTEE

Findings and Conclusions

Pursuant to Commission directive, the Committee forwarded its records to Washington, D.C. where we conducted our examination. Consequently, Committee officials were not available for comment at the completion of our examination.

A. Supporting Documentation for Expenditures

Section 432(d) of Title 2, United States Code, requires the treasurer to obtain and keep a receipted bill, stating the particulars, for every expenditure made by or on behalf of a political committee in excess of \$100, and for any such expenditure in a lesser amount if the aggregate amount of such expenditures to the same person during the calendar year exceeds \$100.

Section 102.9(c) of Title 11, Code of Federal Regulations, provides that when a receipted bill is not available, the treasurer may keep the cancelled check showing payment of the bill; and the bill, invoice or other contemporaneous memorandum of the transaction. Section 102.9(e) requires the treasurer to use his or her best efforts to obtain the required information, and keep a complete record of the efforts to do so.

The Committee made at least 349 expenditures totaling \$150,376.64 which require supporting documentation. The Treasurer failed to retain a receipted bill, invoice or contemporaneous memorandum for 78 of these totaling \$20,507.15. However, each was supported with a cancelled check.

On November 15, 1978, the Commission determined that the Committee was required to obtain the required documentation and submit copies for review within 30 days of receipt of notification. If specific documentation could not be obtained, the Committee was required to submit evidence of its efforts to obtain such documentation.

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The Committee submitted documentation to the Audit staff consisting of letters signed by the payee, and committee letters to payees requesting documentation for 35 expenditures totaling \$10,212.65. This leaves a group of 43 expenditures totaling \$10,294.50 for which no documentation or evidence of efforts to obtain such documentation were submitted by the Committee.

Recommendation

We recommend that due to the Committee's failure to submit the required documentation, or submit evidence of an effort to obtain such documentation, that the matter be referred to the Office of General Counsel for their consideration.

B. Settlement of Corporate Debts

Section 114.10(c) of Title 11, Code of Federal Regulations provides that a corporation may settle or forgive a debt if the creditor has treated the outstanding debt in a commercially reasonable manner. A settlement will be considered commercially reasonable if:

(1) The initial extension of credit was made in accordance with regulations issued pursuant to 2 U.S.C. 451 or paragraph (a);

(2) The candidate or political committee or person has undertaken all commercially reasonable efforts to satisfy the outstanding debt; and

(3) The corporate creditor has pursued its remedies in a manner similar in intensity to that employed by the corporation in pursuit of a non-political debtor, including lawsuits if filed in similar circumstances.

The corporation and/or debtor must file a statement with the Commission including the initial terms of credit, the steps taken to satisfy the debt, and remedies pursued by the creditor. This statement must be filed prior to the termination of the reporting status of the debtor and the statement is subject to Commission review.

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The Committee extinguished two (2) of its debts for less than the amounts incurred. One (1) debt of \$1,400.42 was settled for half or \$700, and the other of \$369.00 was settled for one-fifth or \$73.80. Committee records did not contain the information necessary to determine whether the two (2) debts were settled in a commercially reasonable manner. In addition, no statements of settlement were filed with the Commission.

On November 15, 1978, the Commission determined that the Committee was required to obtain the information necessary to determine whether the debts were treated in a commercially reasonable manner and to forward such information along with the required Statements of Settlement to the Commission within 30 days of receipt of notification.

To date, no response has been made by the Committee concerning the extinguished debts.

Recommendation

We recommend that due to the Committee's failure to prepare an adequate response, or file the Statements of Debt Settlement, that the matter be referred to the Office of General Counsel for their consideration.

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Appendix F

UDALL '76 MASSACHUSETTS SPECIAL EVENTS COMMITTEE

Findings and Conclusions

Pursuant to Commission directive, the Committee forwarded its records to New York where we conducted our examination. Consequently, Committee officials were not available for comment during or at the completion of our examination.

A. Authorization of a Political Committee
Other than a Principal Campaign Committee

Section 102.12(a)(1) provides, in part, that any political committee authorized by a candidate to receive contributions or make expenditures shall be authorized in writing by the candidate.

The Committee registered with the Clerk of the United States House of Representatives on January 17, 1975. On May 23, 1975, the Committee transferred \$1,467.66 to the Udall '76 Committee. The transfer represents 32% of the \$4,531.70 in total reported expenditures of the Committee. At the time of the transfer, the Udall '76 Massachusetts Special Events Committee was not authorized in writing by the Candidate.

On November 15, 1978, the Commission determined that the Candidate was required to submit to the Commission an FEC Form 2A authorizing the Udall '76 Massachusetts Special Events Committee within 30 days of receipt of notification.

The Candidate did not file a Form 2A authorizing the Udall '76 Massachusetts Special Events Committee.

Recommendation

We recommend that due to the Candidate's failure to file an authorization statement, that the matter be referred to the Office of General Counsel for their consideration.

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Appendix G

MICHIGAN UDALL FOR PRESIDENT COMMITTEE

Findings and Conclusions

Pursuant to Commission directive, the Committee forwarded its records to New York where we conducted our examination. Consequently, Committee officials were not available for comment during or at the completion of our examination.

A. Disclosure of Expenditures

Section 434(b)(9) requires the disclosure and the identification of each person to whom expenditures have been made by such committee or on behalf of such committee or candidate within the calendar year in an aggregate amount or value in excess of \$100, the amount, date, and purpose of each such expenditure.

The Committee made 187 expenditures in excess of \$100 totaling \$69,452.37. A sample of 82 expenditures show fifteen expenditures which are not itemized on Committee disclosure reports. The dollar value of the expenditures not itemized is \$6,158.55.

On November 15, 1978, the Commission determined that the Committee was required to file a comprehensive amendment itemizing all expenditures requiring itemization within 30 days of notification.

To date, no amendments have been filed by the Committee itemizing the expenditures.

Recommendation

We recommend that due to the Committee's failure to file the required amendments, that the matter be referred to the Office of General Counsel for their consideration.

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B. Unsupported Expenditures

Section 432(d) of Title 2, United States Code, requires, in part, that the treasurer obtain and keep a receipted bill, stating the particulars, for every expenditure made by or on behalf of a political committee in excess of \$100 in amount, and for any such expenditure in a lesser amount, if the aggregate amount of such expenditures to the same person during a calendar year exceeds \$100.

Section 102.9(c) and (e) of Title 11, Code of Federal Regulations, requires that when a receipted bill is not available, the treasurer may keep the cancelled check showing payment of the bill; and the bill, invoice or other contemporaneous memorandum of the transaction or use his or her best efforts to obtain the required information, and keep a complete record of the efforts to do so.

The Committee made 187 expenditures totaling \$69,452.37 which require supporting documentation. The Treasurer failed to retain a receipted bill, invoice or contemporaneous memorandum for 99 of these expenditures totaling \$26,551.73.

On November 15, 1978, the Commission determined that the Committee was required to obtain the missing documentation and submit copies to the Audit staff, or demonstrate their efforts to do so, within 30 days of notification.

The Committee submitted receipted bills and signed letters from payees for 5 expenditures totaling \$574.74. In addition, the Committee sent letters requesting documentation from payees for 23 expenditures totaling \$8,957.17. No documentation was received for the remaining 71 expenditures totaling \$17,019.82.

Recommendation

We recommend that due to the Committee's failure to submit documentation, or present evidence of a best efforts attempt to do so, that the matter be referred to the Office of General Counsel for their consideration.

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Appendix H

UDALL '76 - MISSOURI

Findings and Conclusions

Pursuant to Commission directive, the Committee forwarded its records to New York where we conducted our examination. Consequently, Committee officials were not available for comment during or at the completion of our examination.

A. Supporting Documentation for Expenditures

Section 432(d) of Title 2, United States Code, requires, in part, the treasurer to obtain and keep a receipted bill, stating the particulars, for every expenditure made by or on behalf of a political committee in excess of \$100 in amount, and for any such expenditure in a lesser amount, if the aggregate amount of such expenditures to the same person during the calendar year exceeds \$100.

Section 102.9(c) and (e) of Title 11, Code of Federal Regulations, requires that when a receipted bill is not available, the treasurer may keep the cancelled check showing payment of the bill; and the bill, invoice or other contemporaneous memorandum of the transaction or use his or her best efforts to obtain the required information, and keep a complete record of the efforts to do so.

The Committee made at least 24 expenditures totaling \$4,145.25 during the period which require retention of supporting documentation. The Committee failed to retain a receipted bill, invoice, bill or contemporaneous memorandum for 15 of these expenditures totaling \$1,714.45. Each expenditure was supported with a cancelled check.

On November 15, 1978, the Commission determined that the Treasurer was required to obtain the required documentation and submit it or evidence of his efforts to obtain such documentation for our review within 30 days of receipt of notification.

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The Committee sent letters to payees requesting documentation for 7 expenditures totaling \$987.82. In addition, the Committee received six (6) responses in the form of signed letters acknowledging receipt of the check for \$326.63. No documentation was received for the remaining 2 expenditures totaling \$400.00.

Recommendation

We recommend that due to the Committee's failure to submit documentation, that the matter be referred to the Office of General Counsel for their consideration of the Committee's "best efforts" attempt.

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Appendix I

NEW HAMPSHIRE UDALL '76 COMMITTEE

Findings and Conclusions

A. Supporting Documentation for Expenditures

Section 432(d) of Title 2, United States Code, requires the treasurer to obtain and keep a receipted bill, stating the particulars, for every expenditure made by or on behalf of a political committee in excess of \$100 in amount and for any such expenditure in a lesser amount, if the aggregate amount to the same person during a calendar year exceeds \$100. Section 102.9(c)(4) and (e) of Title 11, Code of Federal Regulations provides that when a receipted bill is not available, the treasurer may keep a cancelled check, showing payment of the bill; and the bill, invoice or other contemporaneous memorandum of the transaction or use his or her best efforts to obtain the required information, and keep a complete record of the efforts to do so.

The Committee made 253 expenditures totaling \$161,870.89 which require supporting documentation. The Treasurer did not retain a receipted bill, invoice, or contemporaneous memorandum for 20 of those expenditures requiring documentation. These 20 expenditures total \$11,989.48. Each expenditure was supported by a cancelled check.

On November 15, 1978, the Commission determined that the Treasurer was required to obtain the required documentation and submit copies for our review or present evidence of her efforts to do so within 30 days of notification.

The Committee submitted receipted bills, and letters signed by payees acknowledging receipt of the checks for 17 expenditures totaling \$11,062.48. In addition, the Committee sent letters requesting documentation for the three (3) remaining expenditures totaling \$927.00.

Recommendation

We recommend that due to the Committee's efforts to comply with the Commission's recommendations, that no further action be required.

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Appendix J

NEW JERSEY UDALL '76 COMMITTEE

Findings and Conclusions

A. Supporting Documentation for Expenditures

Section 432(d) of Title 2, United States Code, requires the treasurer to obtain and keep a receipted bill, stating the particulars, for every expenditure made by or on behalf of a political committee in excess of \$100 in amount if the aggregate amount of such expenditures to the same person during the calendar year exceeds \$100.

Section 102.9(c)(4) and (e) of Title 11, Code of Federal Regulations provides that when a receipted bill is not available, the Treasurer may keep a cancelled check, showing payment of the bill; and a bill, invoice or other contemporaneous memorandum of the transaction, or use his or her best efforts to obtain the required information, and keep a complete record of the efforts to do so.

The Committee made at least 247 expenditures totaling \$71,272.09 which require supporting documentation. The Treasurer did not retain a receipted bill, invoice, or contemporaneous memorandum for 34 of those expenditures requiring documentation. These 34 expenditures total \$15,569.68. Each expenditure was supported by a cancelled check.

On November 15, 1978, the Commission determined that the Committee was required to obtain the required documentation and submit copies for our review within 30 days of notification. If specific documentation could not be obtained, the Committee was required to submit evidence of its efforts to obtain such documentation.

The Committee sent letters to payees requesting receipts for 27 expenditures totaling \$14,066.14. No documentation was submitted for our review, for the remaining 7 expenditures totaling \$1,503.54.

Recommendation

We recommend that the matter be referred to the Office of General Counsel for their evaluation of the Committee's "best efforts" attempts.

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Appendix K

NEW MEXICO UDALL '76 COMMITTEE

Findings and Conclusions

Pursuant to Commission directive, the Committee forwarded its records to Washington, D.C. where we conducted our examination. Consequently, Committee officials were not available for comment during or at the completion of our examination.

A. Failure to File

Section 434(a)(3) of Title 2 of the United States Code, and the "Notice to Presidential Candidate Committees of January 19, 1976", requires presidential candidates and their authorized committees to file monthly reports in an election year. In addition, Section 104.1(c)(3)(ii) of Title 11, Code of Federal Regulations, requires that a political committee shall continue to file required reports until terminated.

The Committee registered with the Commission on March 10, 1976, and filed reports through April 30, 1976. The Treasurer failed to file reports for the period May 1, 1976 through December 6, 1977. During that period, the Committee collected \$3,443.54 in receipts and made expenditures totaling \$3,327.18. According to the Treasurer, the reports were not filed because of personal problems unrelated to Committee activity. At the request of the Audit Division, on December 9, 1977, the Committee filed reports for the above period.

Recommendation

Although the FEC disclosure reports were not filed on a timely basis, the reports have been received and placed on public record. Therefore, we recommend that no further action be taken in this matter.

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B. Supporting Documentation for Expenditures

Section 432(d) of Title 2, United States Code, requires the treasurer to obtain and keep a receipted bill, stating the particulars, for every expenditure made by or on behalf of a political committee in excess of \$100, and for any such expenditure in a lesser amount, if the aggregate amount of such expenditures to the same person during the calendar year exceeds \$100.

Section 102.9(c)(4) and (e) of Title 11, Code of Federal Regulations, requires that when a receipted bill is not available, the treasurer may keep the cancelled check showing payment of the bill; and the bill, invoice or other contemporaneous memorandum of the transaction or use his best efforts to obtain the required information, and keep a complete record of the efforts to do so.

The Committee made at least 36 expenditures totaling \$10,180.75 which require the retention of supporting documentation. The Treasurer failed to retain a receipted bill, invoice or contemporaneous memorandum for 9 of these expenditures totaling \$2,183.72. Each expenditure is supported by a cancelled check.

On November 15, 1978, the Commission determined that the Treasurer was required to obtain the missing documentation and submit copies for our review or present evidence of his efforts to do so within 30 days of notification.

No documentation or evidence of an effort to obtain such documentation was submitted for Audit staff review.

Recommendation

We recommend that due to the Treasurer's failure to obtain the required documentation, or submit evidence of his efforts to obtain such documentation, that the matter be referred to the Office of General Counsel for their consideration.

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C. Disclosure of Receipts

Section 434(b)(2) of Title 2, United States Code, requires each report to disclose the full name and mailing address (occupation and principal place of business, if any) of each person who has made one or more contributions to or for such committee within the calendar year in an aggregate amount or value in excess of \$100, together with the amount and date of each such contribution.

In calendar year 1976, the Committee received 24 contributions totaling \$5,957.20 which were required to be itemized on Committee reports. Eighteen of these contributions, received from 17 individuals, totaling \$3,757.20, were not itemized.

On November 15, 1978, the Commission determined that the Committee was required to file a comprehensive amendment itemizing the contributions as required within 30 days of notification.

To date, no amendments have been filed by the Committee.

Recommendation

We recommend that due to the Committee's failure to file the required amendments, that the matter be referred to the Office of General Counsel for their consideration.

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Appendix L

NEW YORK UDALL '76 COMMITTEE

Findings and Conclusions

A. Supporting Documentation for Expenditures

Section 432(d) of Title 2, United States Code, requires the treasurer to obtain and keep a receipted bill, stating the particulars, for every expenditure made by or on behalf of a political committee in excess of \$100 in amount, and for any such expenditure in a lesser amount, if the aggregate amount of such expenditures to the same person during a calendar year exceeds \$100.

Section 102.9(c)(4) and (e) of Title 11, Code of Federal Regulations provides that when a receipted bill is not available, the treasurer may keep the cancelled check, showing payment(s) of the bill; and the bill, invoice or other contemporaneous memorandum of the transaction, or use his or her best efforts to obtain the required information, and keep a complete record of the efforts to do so.

The Committee made at least 333 expenditures totaling \$93,433.87 for which supporting documentation is required. The Treasurer did not retain a receipted bill for 79 expenditures. These expenditures totaled \$17,001.90. He also failed to retain a bill, invoice or other contemporaneous memorandum in lieu of a receipted bill, although he did retain a cancelled check in support of each expenditure.

On November 15, 1978, the Commission determined that the Committee was required to obtain the required documentation and submit copies for our review within 30 days of receipt of notification. If specific documentation could not be obtained, the Committee was required to submit evidence of its efforts to obtain such documentation.

The Committee sent letters to payees requesting documentation for 35 expenditures totaling \$6,168.79. In addition, the Committee received responses from 5 payees totaling \$1,455.60 which acknowledged receipt of the check, and gave a brief purpose of expenditure. No documentation was submitted for the remaining 39 expenditures totaling \$9,377.51.

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Recommendation

We recommend that due to the Committee's failure to submit adequate documentation, or provide evidence of a best efforts attempt to obtain such documentation for the remaining 39 expenditures, that the matter be referred to the Office of General Counsel for their consideration.

B. Disclosure of Contributions

Section 434(b)(2) of Title 2, United States Code, requires each report to disclose the full name and mailing address (occupation and principal place of business, if any) of each person who has made one or more contributions to or for such committee or candidate within the calendar year in an aggregate amount or value in excess of \$100 together with the amount and date of each such contribution.

The Committee received 71 contributions totaling \$17,280.00 which are required to be itemized. Twenty-five (25) of these contributions totaling \$3,504.00 were not itemized on Committee reports.

On November 15, 1978, the Commission determined that the Committee was required to file a comprehensive amendment itemizing the contributions and contributor information required within 30 days of notification.

The Committee has not filed the required amendments itemizing the twenty-five contributions.

Recommendation

We recommend that due to the Committee's failure to file the required amendments, that the matter be referred to the Office of General Counsel for their consideration.

C. Disclosure of In-Kind Contributions

Section 104.3(a)(1) of Title 11, Code of Federal Regulations, provides that each in-kind contribution shall be valued at the usual and normal charge and if in excess of \$100, reported on the appropriate schedule, identified and listed as an in-kind contribution.

On March 18, 1976, the Committee received an in-kind contribution of \$900.00 in the form of telephone deposits. The deposits were refunded to the contributor on April 22, 1976 by the telephone company. The receipt of the \$900.00 in-kind contribution was not reported by the Committee.

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On November 15, 1978, the Commission determined that the Committee was required to amend its disclosure reports to show the receipt of the in-kind contribution within 30 days of notification.

To date, no amendments have been filed by the Committee.

Recommendation

We recommend that due to the Committee's failure to file the required amendment, that the matter be referred to the Office of General Counsel for their review.

D. Other Matters

The following is an item noted during the course of the audit, for which no Committee action is required:

1) During the period March 20, 1976 through April 9, 1976, an individual made contributions totaling \$213.00. On March 18, the same contributor loaned the Committee \$900 which was not repaid until April 22, 1976. Therefore, for the period March 31, 1976 through April 22, 1976, the contributor exceeded the contribution limit established by Section 441a(a)(1)(A) of Title 2, United States Code.

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Appendix M

UDALL '76 COMMITTEE - OHIO

Findings and Conclusions

Pursuant to Commission directive, the Committee forwarded its records to New York where we conducted our examination. Consequently, Committee officials were not available for comment during or at the completion of our examination.

A. Recordkeeping for Contributions

Section 432(c)(1) of Title 2, United States Code, requires the treasurer to keep a detailed and exact account of all contributions to or for such committee.

1. The Committee reports show transfers-in from the National Committee totaling \$59,949.49. The Committee reports, when compared with the bank records, indicate receipt of this amount. Committee records presented at the time of the audit were not sufficient in detail to specify the dates and amounts of these transfers. The National Committee indicated that \$49,949.00 was transferred to the Committee.

2. In addition, Committee records contain a fund-raising invitation to an event which was scheduled to occur on Friday, April 9, 1976 and to which the Candidate was to appear. The price shown on the face of the invitation is \$125.00 per person.

No other records were presented or available at the time the field audit was conducted to confirm that this fundraiser was held.

However, a review of the Committee's May 10, 1976 FEC report shows five (5) contributors from Ohio who contributed in multiples of \$125.00 totaling \$875.00.

On November 15, 1978, the Commission determined that the Committee was required to provide documents which specify both the dates and amounts of each transfer or if the funds were not received from the National Committee the source of the funds. In addition, they were to provide the date and proceeds from the fundraiser, if any. This material was required to be submitted within 30 days of notification.

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The Committee Treasurer responded with a letter stating that the fundraiser had been held, and the five (5) contributors noted were the only itemized contributions collected, but did not provide the Audit staff with additional records to verify the April 9 fundraiser, or to explain the discrepancy existing in the transfer totals.

Recommendation

We recommend that due to the Committee's failure to provide the necessary documents, that the matter be referred to the Office of General Counsel for their consideration.

B. Supporting Documentation for Expenditures

Section 432(d) of Title 2, United States Code, requires that the treasurer obtain and keep a receipted bill, stating the particulars, for every expenditure made by or on behalf of a political committee in excess of \$100 in amount, and for any such expenditure in a lesser amount, if the aggregate amount of such expenditures to the same person during a calendar year exceeds \$100.

Section 102.9(c)(4) and (e) of Title 11, Code of Federal Regulations, provides that when a receipted bill is not available, the treasurer may keep the cancelled check showing payment of the bill; and the bill, invoice or other contemporaneous memorandum of the transaction or use his or her best efforts to obtain the required information, and keep a complete record of the efforts to do so.

The Committee made at least 142 expenditures totaling \$62,895.19 which require supporting documentation. The Treasurer failed to retain a receipted bill, invoice or contemporaneous memorandum, for 75 expenditures totaling \$31,626.99. One (1) of these expenditures was not supported by a cancelled check.

On November 15, 1978, the Commission determined that the Treasurer was required to obtain the appropriate supporting documentation and submit copies for our review, or present evidence of his efforts to do so, within 30 days of notification.

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The Committee submitted signed letters from payees acknowledging receipt of the check for 2 expenditures totaling \$1,450.00. In addition, the Committee submitted copies of letters sent to payees requesting receipts for six (6) expenditures totaling \$1,285.00. No documentation was received for the remaining 67 expenditures totaling \$28,891.99.

Recommendation

We recommend that due to the Committee's failure to obtain, or submit evidence of a "best efforts" attempt to obtain the required documentation, that the matter be referred to the Office of General Counsel for their consideration.

C. Itemization of Expenditures

Section 434(b)(9) of Title 2, United States Code, requires each report to disclose the identity of each person to whom expenditures have been made by such committee or on behalf of such committee or candidate within the calendar year in an aggregate amount or value in excess of \$100, the amount, date, and purpose of each such expenditure.

The Committee made at least 142 expenditures in excess of \$100 totaling \$62,895.19 which are required to be itemized on Committee reports. Forty-seven of these expenditures, totaling \$15,304.28 are not itemized.

On November 15, 1978, the Commission determined that the Committee was required to file an amended disclosure report itemizing the omitted expenditures within 30 days of notification.

To date, no disclosure amendments have been filed.

Recommendation

We recommend that due to the Committee's failure to file the required amendments, that the matter be referred to the Office of General Counsel for their consideration.

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Appendix N

OREGON UDALL '76 COMMITTEE

Findings and Conclusions

A. Contribution Limitations

Section 441a(a)(1)(A) of Title 2, United States Code, provides, in part, that no person shall make contributions to any candidate and his authorized political committees with respect to any election for Federal office which in the aggregate exceed \$1,000.00.

The Committee received a contribution of \$250.00 on December 4, 1975, and a loan of \$1,000.00 from the same person on March 26, 1976. The debt of \$1,000.00 was subsequently transferred to the National Committee. Upon learning that the above contributor had exceeded his contribution limitation by \$250.00, the Treasurer notified the National Committee. The National Committee repaid half of the loan (\$500.00) on October 19, 1976, thereby bringing the total amount of contributions received from the contributor down to \$750.00. Although the Committee has taken action to return the excess contribution, the contributor had exceeded his limitation by \$250.00 for a period of seven (7) months.

Recommendation

Since the Committee has returned the excess contribution, we recommend no action be taken in this matter.

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Appendix O

PENNSYLVANIA UDALL '76 COMMITTEE

Findings and Conclusions

Pursuant to Commission directive, the Committee forwarded its records to New York where we conducted our examination. Consequently, Committee officials were not available for comment during or at the completion of our examination.

A. Disclosure of Transfers

Section 434(b)(4) of Title 2, United States Code, requires that the Committee disclose the name and address of each political committee from which the reporting committee received any transfer of funds, together with the amounts and dates of all transfers.

Summary sheets, contained in the Committee's June 10, 1976 report, show the receipt of \$3,147.51 in transfers from an affiliated Committee. The Treasurer did not itemize the transfers on a supporting schedule as required. Also, he did not record the name of the transferring Committee, the date of receipt or amount in Committee records, as required. A review of the National and other affiliated Committee reports and records produced no evidence that any one of these Committees made the transfer. Thus, we were unable to determine its source.

On November 15, 1978, the Commission determined that the Committee was required to file an amended June 10, 1976 report and provide a statement as to the source of funds received within 30 days of notification.

The required amendments, and additional information requested have not been provided to date.

Recommendation

We recommend that due to the Committee's failure to provide additional documentation, and file the required amendments, that the matter be referred to the Office of General Counsel for their consideration.

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B. Supporting Documentation for Expenditures

Section 432(d) of Title 2, United States Code, requires the treasurer to obtain and keep a receipted bill, stating the particulars, for every expenditure made by or on behalf of a political committee in excess of \$100 in amount, and for any such expenditure in a lesser amount if expenditures to the same person exceed \$100 in amount during the calendar year.

Section 102.9(c)(4) and (e) of Title 11, Code of Federal Regulations, provides that when a receipted bill is not available, the treasurer may keep the cancelled check showing payment(s) and the bill, invoice or other contemporaneous memorandum of the transaction. When Committee treasurers and candidates show that best efforts have been used to obtain and submit the information required by this subsection, they shall be deemed to be in compliance with the subsection.

The Committee made at least 157 expenditures totaling \$92,405.11 which require supporting documentation. The Treasurer failed to retain a receipted bill for 45 of these expenditures which totaled \$22,105.41. A cancelled check was retained as partial support for every expenditure.

On November 15, 1978, the Commission determined that the Treasurer was required to obtain the appropriate documentation and submit copies for review by the Audit staff or present evidence of his efforts to do so within 30 days of notification.

The Committee sent letters to payees requesting receipts for 11 expenditures totaling \$6,905.27. No documentation was received for the remaining 34 expenditures totaling \$15,200.14.

Recommendation

We recommend that due to the Committee's failure to obtain, or submit evidence of a "best efforts" attempt to obtain the required documentation, that the matter be referred to the Office of General Counsel for their consideration.

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C. Disclosure of Expenditures

Section 434(b)(9) of Title 2, United States Code, requires that each report shall disclose the identity of each person to whom expenditures have been made by such committee or on behalf of such committee or candidate within the calendar year in an aggregate amount or value in excess of \$100, the amount, date and purpose of each such expenditure.

The Committee made at least 157 expenditures totaling \$92,405.11 which are required to be itemized on Committee reports. Forty-one of these expenditures totaling \$19,721.87 are not itemized.

On November 15, 1978, the Commission determined that the Committee was required to file a comprehensive amendment itemizing these expenditures within 30 days of notification.

To date, no amendments have been filed.

Recommendation

We recommend that due to the Committee's failure to file the required amendments, that the matter be referred to the Office of General Counsel for their consideration.

D. Expenditures to Cash in Excess of \$100

Section 437b(b), of Title 2, United States Code, states in part, that a political committee may maintain a petty cash fund out of which it may make expenditures not in excess of \$100 to any person in connection with a single purchase or transaction. Section 102.10 of Title 11, Code of Federal Regulations adds that a check made payable to "cash" shall not be made in excess of \$100 except to replenish a petty cash fund.

The Committee wrote 14 checks totaling \$5,156.54 payable to "cash", each of which was in excess of \$100. ^{1/} Eleven of the 14 checks were unsupported, and 12 were not itemized on Committee reports. The purposes listed on the check memo entry line varied, but included the following: printing supplies, cash-on-hand, election day expenses, check cashing, postage, and scheduling. Committee records contained neither a petty cash journal nor receipts as evidence to support a petty cash fund.

^{1/} These expenditures have been included in the unsupported and unitemized sections of this report.

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On November 15, 1978, the Commission determined that the Treasurer was to be advised of the restrictions on cash expenditures and be directed to obtain appropriate documentation needed to explain the disposition of such funds and to submit copies of such documentation for our review or present evidence of his efforts to do so within 30 days of notification.

To date, the requested information has not been provided.

Recommendation

We recommend that due to the Committee's failure to provide the required information, that the matter be referred to the Office of General Counsel for their consideration.

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Appendix P

WASHINGTON CITIZENS FOR UDALL '76

Findings and Conclusions

Pursuant to Commission directive, the Committee forwarded its records to New York where we conducted our examination. Consequently, Committee officials were not available for comment during or at the completion of our examination.

A. Incomplete Records Presented for Audit

Section 432(d) of Title 2, United States Code, requires, in part, the treasurer to preserve all receipted bills and accounts to be kept by this section. Section 104.12(b)(1) of Title 11, Code of Federal Regulations, requires each candidate or political committee or other person required to file any statement under this subchapter to maintain records with respect to the matters required to be reported which shall provide in sufficient detail the necessary information and data from which the filed reports and statements may be verified, explained, clarified and checked for accuracy and completeness.

For the period December 11, 1975 through June 30, 1976, the Committee reported receipts of \$15,920.78 and expenditures of \$14,613.95. The bank records provided by the Treasurer were bank statements, cancelled checks, check register and deposit tickets, but these were incomplete for the period December 1, 1975 through February 29, 1976. Committee bank statements and deposit tickets were missing for that period. Therefore, we were unable to verify and check for accuracy the reported \$5,176.00 in receipts and \$5,290.48 in expenditures.

On November 15, 1978, the Commission determined that the Committee was required to obtain the records necessary to verify Committee reported receipt and expenditure totals and submit copies for our review or demonstrate their efforts to do so within 30 days of notification.

To date, no additional records have been provided by the Committee.

Recommendation

We recommend that due to the Committee's failure to provide the additional records required, that the matter be referred to the Office of General Counsel for their consideration.

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B. Corporate Contributions

Section 441b(a) of Title 2, United States Code, prohibits any corporation from making a contribution in connection with any Presidential primary election, or for any candidate, political committee, or any other person knowingly to accept or receive any contribution prohibited by this section.

Committee records contain an invoice totaling \$882.00 which shows a deduction from that total of \$316.00. The deduction, provided by a printer, is identified on the invoice as a "contribution to the Udall Campaign (for your records only)". The invoice was dated May 28, 1976. A check with the Office of the Secretary of State found that the printer was incorporated on April 3, 1959.

On November 15, 1978, the Commission determined that the Committee was required to return the contribution and submit copies of both sides of the refund check within 30 days of notification.

No evidence has been provided that the refund has been made.

Recommendation

We recommend that due to the Committee's failure to provide evidence of the refunds, that the matter be referred to the Office of General Counsel for their consideration.

C. Supporting Documentation for Expenditures

Section 432(d) of Title 2, United States Code, requires the treasurer to obtain and keep a receipted bill, stating the particulars, for every expenditure made by or on behalf of a political committee in excess of \$100 in amount, and for any such expenditure in a lesser amount, if the aggregate amount of such expenditure to the same person during a calendar year exceeds \$100.

Section 102.9(c)(4) and (e) of Title 11, Code of Federal Regulations, provides that when a receipted bill is not available, the treasurer may keep the cancelled check showing payment of the bill; and the bill, invoice or other contemporaneous memorandum of the transaction or use his or her best efforts to obtain the required information, and keep a complete record of the efforts to do so.

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The Committee made at least 52 expenditures totaling \$10,783.41 which require supporting documentation. The Treasurer did not retain a receipted bill, invoice, or contemporaneous memorandum for 39 of these expenditures totaling \$6,959.55. Twenty-five of these expenditures were not supported by a cancelled check.

On November 15, 1978, the Commission determined that the Committee was required to obtain the missing documentation and submit copies for review to the Audit staff, or present evidence of their efforts to do so within 30 days of notification.

In response to our recommendations, the Committee submitted letters signed by the payee acknowledging receipt of the check, for eight (8) expenditures totaling \$1,574.19. No documentation has been received for the remaining 31 expenditures totaling \$5,385.36.

Recommendation

We recommend that due to the Committee's failure to obtain the required documentation, or provide evidence of a "best efforts" attempt to obtain such documentation, that the matter be referred to the Office of General Counsel for their consideration.

D. Disclosure of Expenditures

Section 434(b)(9) of Title 2, United States Code, requires the disclosure of the identification of each person to whom expenditures have been made by a committee or on behalf of a committee or candidate within the calendar year in an aggregate amount or value in excess of \$100 and the amount, date and purpose of each such expenditure.

The Committee made at least 52 expenditures totaling \$10,783.41 which require itemization on Committee reports. A total of 31 expenditures totaling \$5,685.11, were not itemized as required.

On November 15, 1978, the Commission determined that the Committee was required to file a comprehensive amendment itemizing the required expenditures within 30 days of notification.

No amendments have been filed by the Committee.

Recommendation

We recommend that due to the Committee's failure to file the required amendments, that the matter be referred to the Office of General Counsel for their consideration.

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E. Disclosure of Outstanding Debt

Section 434(b)(12) of Title 2, United States Code, requires the disclosure of the amount and nature of debts owed by the committee until such debts are extinguished, together with a statement as to the circumstances and conditions under which any such debt is extinguished.

Section 104.1(a)(1) of Title 11, Code of Federal Regulations provides that a political committee shall file reports of contributions and expenditures until all debts and obligations relating to that committee's Federal election activity are extinguished.

On the Committee's July 10, 1976 report, marked as a termination report, the Committee disclosed an outstanding debt of \$3,099.32. No statement was made as to the disposition of these debts, and they were not disclosed as assumed or paid by the Udall '76 National Committee.

In addition, on the April 10, 1976 report, the Committee disclosed an outstanding debt of \$1,274.60 owed to a printing company. On subsequent reports, no payments are itemized, and no outstanding debt is shown.

On November 15, 1978, the Commission determined that the Committee was required to file a statement indicating the final disposition of these debts within 30 days of receipt of notification.

No statement indicating the disposition of the noted debts has been filed.

Recommendation

We recommend that due to the Committee's failure to provide the additional information, that the matter be referred to the Office of General Counsel for their consideration.

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Appendix Q

WISCONSIN UDALL '76 COMMITTEE

Findings and Conclusions

Pursuant to Commission directive, the Committee forwarded its records to Washington, D.C. where we conducted our examination. Consequently, Committee officials were not available for comment during or at the completion of our examination.

A. Supporting Documentation for Expenditures

Section 432(d) of Title 2, United States Code, requires the treasurer to obtain and keep a receipted bill, stating the particulars, for every expenditure made by or on behalf of a political committee in excess of \$100 in amount, and for any such expenditure in a lesser amount, if the aggregate amount of such expenditures to the same person during the calendar year exceeds \$100. Section 102.9(c)(4) of Title 11, Code of Federal Regulations, provides that when a receipted bill is not available, the treasurer may keep the cancelled check(s) showing payment of the bill and the bill, invoice or other contemporaneous memorandum of the transaction, or use his or her best efforts to obtain the required information, and keep a complete record of the efforts to do so.

The Committee made at least 435 expenditures totaling \$187,808.92 which require supporting documentation. The Treasurer failed to retain a receipted bill for 95 of these expenditures which totaled \$47,658.50. A cancelled check was retained as partial support for every expenditure.

On November 15, 1978, the Commission determined that the Treasurer was required to obtain and provide copies of the appropriate supporting documentation for our review or present evidence of his efforts to do so within 30 days of receipt of notification.

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In response to our recommendations, the Committee obtained documentation for one (1) expenditure totaling \$3,500. In addition, the Committee received signed letters from payees, for 11 expenditures totaling \$15,960.00, and sent letters requesting receipts for 39 expenditures totaling \$12,089.86. No documentation was received for the remaining 44 expenditures totaling \$16,108.64.

In addition, in letters received on February 22, 1979, and an affidavit dated February 27, 1979, the Committee Treasurer states that prior to submission of Committee records for audit, all receipts were present in Committee records. The Treasurer concluded by stating, that "As I distinctly recall obtaining the receipts, and filing them, and as they were in the files when the files were sent to the Federal Election Commission for audit, I can only conclude that they were lost by your auditors".

According to the Audit staff involved, all records received were returned. In addition, the audit was not conducted at the Federal Election Commission, but at a law firm retained by the Udall '76 National Committee, with the records under Committee control.

Recommendation

We recommend that due to the Committee's failure to obtain the requested documentation, or provide evidence of a "best efforts" attempt to obtain such documentation, that the matter be referred to the Office of General Counsel for their consideration.

B. Cash Expenditures Greater Than \$100

Section 437b(b), of Title 2, United States Code, states in part, that a political committee may maintain a petty cash fund out of which it may make expenditures not in excess of \$100 to any person in connection with a single purchase or transaction. Section 102.10 of Title 11, Code of Federal Regulations adds that a check made payable to "cash" shall not be made in excess of \$100 except to replenish a petty cash fund.

Committee records contain 22 checks made payable to "cash". Each of the checks was for an amount in excess of \$100 and totaled \$11,255.00. The checks were endorsed by various Committee persons. Eight (8) are supported with contemporaneous memoranda which do not provide the appropriate particulars, while five (5) others are supported only with a cancelled check. The remaining nine (9) expenditures were adequately supported. Seven (7) of the 22 are not itemized in Committee reports while three (3) are shown as being paid to persons other than those who endorsed the checks.

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According to the Treasurer, the Committee did not maintain a petty cash fund. She explained that most of the money went for stamps, operating expenses, and reimbursements. She did not explain the deficiencies noted in the disclosure of the cash payments.

On November 15, 1978, the Commission determined that the Committee was required to file an amended FEC disclosure report within 30 days of notification itemizing these expenditures. In addition, the Committee is advised that these 13 unsupported expenditures are contained on the National Committee's list of apparently unqualified campaign expenses.

No amendments have been filed by the Committee itemizing the expenditures.

Recommendation

We recommend that due to the Committee's failure to file the required amendments, that the matter be referred to the Office of General Counsel for their consideration.

C. Disclosure of Contributions

Section 434(b)(2) of Title 2, United States Code, provides that each report under this section shall disclose the full name and address (occupation and principal place of business, if any) of each person who has made one or more contributions to or for such committee within the calendar year in an aggregate amount in excess of \$100.

The Committee received at least 207 contributions totaling \$18,782.71, which are required to be itemized on Committee reports.

The Committee failed to itemize 53 of these contributions totaling \$3,432.50.

On November 15, 1978, the Commission determined that the Treasurer was required to file a comprehensive amendment itemizing the above contributions as required within 30 days of notification.

To date, no amendments have been filed by the Committee itemizing these contributions.

Recommendation

We recommend that due to the Committee's failure to file the required amendments, that the matter be referred to the Office of General Counsel for their consideration.

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Attachment 1

Udall '76 Committee

Attachment 1 Page 1 of 3

Schedule of Unsupported Expenditures as of 5/4/79
Udall '76 California Committee

Payee	Check Number	Payee's Function	Date	Amount of Check	Unsupported		Supported	
					Amount Unsupported as of 5/4/79	Type of * Documents	Intended Purpose per Documents Provided For FEC Inspection	Amount Supported
<u>Southern California</u>								
Heidi Zukowski	198	Field	4/23/76	\$105.00	\$105.00	1 + 5	Precinct Maps	
Arthur Forcier	324	Field Person	5/28/79	\$109.39	\$109.39	1	Reimbursed Printing Expenses	
	361	Consultant	6/8/76	\$128.00	\$128.00	1	Reimbursed Travel Expenses	

- Type of Documentation:
- (1) Cancelled check (Committee account to payee) and Committee generated memorandum.
 - (2) Cancelled Committee check only.
 - (3) Memorandum from payee without cancelled check to the ultimate vendor/payee, or other ultimate vendor/payee documentation.
 - (4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.
 - (5) Committee effort - letter sent to payee.

Udall '76 Committee

Attachment 1 Page 2 of 3

Schedule of Unsupported Expenditures as of 5/4/79
Udall '76 California Committee

Payee	Check Number	Payee's Function	Date	Amount of Check	Unsupported		Supported	
					Amount Unsupported as of 5/4/79	Type of * Documents	Intended Purpose per Documents Provided For FEC Inspection	Amount Supported
<u>Southern California (continued)</u>								
Aki Toyooka	278	Field Person	5/13/76	\$266.81	\$266.81	1 + 5	Reimbursed Expenses	
Helen Pedotti	328	Field Person	6/1/76	\$220.00	\$220.00	1	Operating Expenses	
	362	Person	6/8/76	\$110.00	\$110.00	1		
Craig Beauchamp	337	Field Person	6/3/76	\$211.07	\$211.07	1	Radio Spots	

- Type of Documentation:
- (1) Cancelled check (Committee account to payee) and Committee generated memorandum.
 - (2) Cancelled Committee check only.
 - (3) Memorandum from payee without cancelled check to the ultimate vendor/payee, or other ultimate vendor/payee documentation.
 - (4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.
 - (5) Committee effort - letter sent to payee.

Udall '76 Committee

Attachment 1 Page 3 of 3

Schedule of Unsupported Expenditures as of 5/4/79
Udall '76 California Committee

Payee	Check Number	Payee's Function	Date	Amount of Check	Unsupported		Supported	
					Amount Unsupported as of 5/4/79	Type of * Documents	Amount Supported	Type of * Documents
<u>Los Angeles</u>								
Jane Boyd	1002	Field Person	12/2/75	\$250.00	\$ 250.00	1 + 5	Fundraising Work	
<u>Northern California</u>								
Jeff Denno	135	Field Person	6/24/76	\$134.28	\$ 134.28	1	Reimbursed Expenses	
Arthur Blaustein	139	Field Person	6/30/76	\$180.00	\$ 180.00	1	Reimbursed for Ad in Daily California	
Total					<u>\$1,714.55</u>			

- Type of Documentation:
- (1) Cancelled check (Committee account to payee) and Committee generated memorandum.
 - (2) Cancelled Committee check only.
 - (3) Memorandum from payee without cancelled check to the ultimate vendor/payee, or other ultimate vendor/payee documentation.
 - (4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.
 - (5) Committee effort - letter sent to payee.

Udall '76 Committee

Attachment 2 Page 1 of 1

Schedule of Unsupported Expenditures as of 5/4/79
Connecticut Udall '76 Committee

<u>Payee</u>	<u>Check Number</u>	<u>Payee's Function</u>	<u>Date</u>	<u>Amount of Check</u>	<u>Unsupported</u>		<u>Supported</u>	
					<u>Amount Unsupported as of 5/4/79</u>	<u>Type of * Documents</u>	<u>Intended Purpose per Documents Provided For FEC Inspection</u>	<u>Amount Supported</u>
Chris Suisman	139	Field	4/30/76	\$200.00	\$200.00	1		Press Bus
			Total		<u>\$200.00</u>			

- Type of Documentation:
- (1) Cancelled check (Committee account to payee) and Committee generated memorandum.
 - (2) Cancelled Committee check only.
 - (3) Memorandum from payee without cancelled check to the ultimate vendor/payee, or other ultimate vendor/payee documentation.
 - (4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.
 - (5) Committee effort - letter sent to payee.

Schedule of Unsupported Expenditures as of 5/4/79
D.C. Committee for Udall

Payee	Check Number	Payee's Function	Date	Amount of Check	Unsupported		Supported	
					Amount Unsupported as of 5/4/79	Type of * Documents	Amount Supported	Type of * Documents
John Issacs	16	Field Person	7/24/76	\$120.00	\$120.00	1 + 7	Convention Expenses	
Total					\$120.00			

- Type of Documentation:
- (1) Cancelled check (Committee account to payee) and Committee generated memorandum.
 - (2) Cancelled Committee check only.
 - (3) Memorandum from payee without cancelled check to the ultimate vendor/payee, or other ultimate vendor/payee documentation.
 - (4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.
 - (5) Committee effort - letter sent to payee.
 - (7) Response received from payee - response inadequate.

Udall '76 Committee

Attachment 4 Page 1 of 1

Schedule of Unsupported Expenditures as of 5/4/79
Iowa Udall '76 Committee

Payee	Check Number	Payee's Function	Date	Amount of Check	Amount Unsupported as of 5/4/79	Unsupported		Supported	
						Type of * Documents	Intended Purpose per Documents Provided For FEC Inspection	Amount Supported	Type of * Documents
Greg Andrews	152	Advance Person	12/30/75	\$200.00	\$200.00	1 + 7	Advance Expenses		
Robert Bedard	223	Wisconsin Coordinator	1/11/76	\$400.00	\$400.00	1 + 7	Expenses		
Total					<u>\$600.00</u>				

- Type of Documentation:
- (1) Cancelled check (Committee account to payee) and Committee generated memorandum.
 - (2) Cancelled Committee check only.
 - (3) Memorandum from payee without cancelled check to the ultimate vendor/payee, or other ultimate vendor/payee documentation.
 - (4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.
 - (5) Committee effort - letter sent to payee.
 - (7) Response received from payee - response inadequate.

Udall '76 Committee

Attachment 5 Page 1 of 1

Schedule of Unsupported Expenditures as of 5/4/79
Kentucky Udall '76 Committee

<u>Payee</u>	<u>Check Number</u>	<u>Payee's Function</u>	<u>Date</u>	<u>Amount of Check</u>	<u>Amount Unsupported as of 5/4/79</u>	<u>Unsupported</u>	<u>Supported</u>
						<u>Type of * Documents</u>	<u>Intended Purpose per Documents Provided For FEC Inspection</u>
Mark Brand	1055	Field Person	5/24/76	\$254.37	\$254.37	1 + 5	Reimbursed Expenses
Total					<u>\$254.37</u>		

- Type of Documentation:
- (1) Cancelled check (Committee account to payee) and Committee generated memorandum.
 - (2) Cancelled Committee check only.
 - (3) Memorandum from payee without cancelled check to the ultimate vendor/payee, or other ultimate vendor/payee documentation.
 - (4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.
 - (5) Committee effort - letter sent to payee.

Schedule of Unsupported Expenditures as of 5/4/79
Udall Maryland Campaign

Payee	Check Number	Payee's Function	Date	Amount of Check	Amount Unsupported as of 5/4/79	Unsupported		Supported	
						Type of * Documents	Intended Purpose per Documents Provided For FEC Inspection	Amount Supported	Type of * Documents
Karen Ditman	389	Field Person	5/15/76	\$136.04	\$136.04	1	Stationery		
	164		4/26/76	\$200.00	\$200.00	1	Hall Rent		
Kathie Washburn	378	Field Person	5/15/76	\$237.00	\$237.00	1	Office Supplies		
	162		4/26/76	\$100.62	\$100.62	1	Travel		
	143		4/21/76	\$100.00	\$100.00	1	Hall Rent		
Robert Dilger	114	Field Person	4/5/76	\$119.25	\$119.25	1	Envelopes and Stamps		

- Type of Documentation:
- (1) Cancelled check (Committee account to payee) and Committee generated memorandum.
 - (2) Cancelled Committee check only.
 - (3) Memorandum from payee without cancelled check to the ultimate vendor/payee, or other ultimate vendor/payee documentation.
 - (4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.
 - (5) Committee effort - letter sent to payee.

Schedule of Unsupported Expenditures as of 5/4/79
Udall Maryland Campaign

Payee	Check Number	Payee's Function	Date	Amount of Check	Unsupported		Supported		
					Amount Unsupported as of 5/4/79	Type of * Documents	Intended Purpose per Documents Provided For FEC Inspection	Amount Supported	Type of * Documents
J. Whitson Rodgers	140	Field Person	4/20/76	\$200.00	\$ 200.00	1	Rent		
Bob Guttman	139	Field Person	4/20/76	\$150.00	\$ 150.00	1	Rent		
	161	Person	4/20/76	\$100.00	\$ 100.00	1	Rent		
Total					<u>\$1,342.91</u>				

- Type of Documentation:
- (1) Cancelled check (Committee account to payee) and Committee generated memorandum.
 - (2) Cancelled Committee check only.
 - (3) Memorandum from payee without cancelled check to the ultimate vendor/payee, or other ultimate vendor/payee documentation.
 - (4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.
 - (5) Committee effort - letter sent to payee.

Schedule of Unsupported Expenditures as of 5/4/79
 Massachusetts Udall '76 Committee

Payee	Check Number	Payee's Function	Date	Amount of Check	Unsupported		Supported		
					Amount Unsupported as of 5/4/79	Type of * Documents	Intended Purpose per Documents Provided For FEC Inspection	Amount Supported	Type of * Documents
Mike Kurman	474	Field	2/21/76	\$112.00	\$112.00	1	Travel and Food Advance		
	615	Person	3/2/76	\$150.00	\$150.00	1	Travel and Food Advance		
Ann Pongracz	263	Field	12/16/75	\$100.00	\$100.00	1	Campaign Expenses		
	556	Person	2/20/76	\$100.00	\$100.00	1 + 5	Reimbursed Expenses		
Mike Fernandez	294	Field	12/22/75	\$100.00	\$100.00	1	Reimbursed Expenses		
	406	Person	1/28/76	\$115.00	\$115.00	1	Greyhound		
David Marshall	432	Field	1/30/76	\$100.00	\$100.00	1	Field Expenses		
	664	Person	3/3/76	\$250.00	\$250.00	1	Field Expenses		

- Type of Documentation:
- (1) Cancelled check (Committee account to payee) and Committee generated memorandum.
 - (2) Cancelled Committee check only.
 - (3) Memorandum from payee without cancelled check to the ultimate vendor/payee, or other ultimate vendor/payee documentation.
 - (4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.
 - (5) Committee effort - letter sent to payee.

Schedule of Unsupported Expenditures as of 5/4/79
Massachusetts Udall '76 Committee

Payee	Check Number	Payee's Function	Date	Amount of Check	Amount Unsupported as of 5/4/79	Unsupported		Supported	
						Type of * Documents	Intended Purpose per Documents Provided For FEC Inspection	Amount Supported	Type of * Documents
Virginia Sisco	450	Field Person	2/2/76	\$150.00	\$150.00	1 + 5	Reception Expenses		
Warren Jones	603	Field Person	3/1/76	\$212.00	\$212.00	1 + 5	Travel and Food Advance		
John Durfman	475	Field Person	2/21/76	\$150.00	\$150.00	1	Travel Advance		
Mark Brand	494	Field Person	2/23/76	\$100.00	\$100.00	1	Travel and Food Advance		
Mark Brand	532	Field Person	2/25/76	\$112.00	\$112.00	1 + 5	Travel and Food Advance		
Mark Brand	543	Field Person	2/26/76	\$212.00	\$212.00	1	Travel and Food Advance		

- Type of Documentation: (1) Cancelled check (Committee account to payee) and Committee generated memorandum.
- (2) Cancelled Committee check only.
- (3) Memorandum from payee without cancelled check to the ultimate vendor/payee, or other ultimate vendor/payee documentation.
- (4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.
- (5) Committee effort - letter sent to payee.

Schedule of Unsupported Expenditures as of 5/4/79
Massachusetts Udall '76 Committee

Payee	Check Number	Payee's Function	Date	Amount of Check	Amount Unsupported as of 5/4/79	Type of * Documents	Intended Purpose per Documents Provided For FEC Inspection	Supported	
								Amount Supported	Type of * Documents
Greg Andrews	536	Field Person	2/25/76	\$212.00	\$212.00	1 + 7	Travel and Food Advance		
	665	Person	3/3/76	\$100.00	\$100.00	1 + 7	Travel and Food Advance		
Paul Costello	537	Field Person	2/25/76	\$212.00	\$212.00	1 + 7	Travel and Food Advance		
	666	Person	3/3/76	\$100.00	\$ 67.63	1 + 7	Travel and Food Advance	\$ 32.37	4
Cathy Blake	748	Field Person	5/1/76	\$125.00	\$125.00	1	Reimbursed Transportation and Food for February		
Colin Matthews	462	Field Person	2/19/76	\$263.78	\$212.00	1	Field Advance	\$ 51.78	4
First Nat'l Bank of Boston	596	Bank	3/2/76	\$343.75	\$155.75	1	Money Order	\$188.00	4

- (1) Cancelled check (Committee account to payee) and Committee generated memorandum.
- (2) Cancelled Committee check only.
- (3) Memorandum from payee without cancelled check to the ultimate vendor/payee, or other ultimate vendor/payee documentation.
- (4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.
- (5) Committee effort - letter sent to payee.
- (7) Response received from payee - response inadequate.

Schedule of Unsupported Expenditures as of 5/4/79
 Massachusetts Udall '76 Committee

<u>Payee</u>	<u>Check Number</u>	<u>Payee's Function</u>	<u>Date</u>	<u>Amount of Check</u>	<u>Amount Unsupported as of 5/4/79</u>	<u>Unsupported</u>		<u>Supported</u>	
						<u>Type of * Documents</u>	<u>Intended Purpose per Documents Provided For FEC Inspection</u>	<u>Amount Supported</u>	<u>Type of * Documents</u>
Charles Appleby	C777	Field Person	3/3/76	\$150.00	\$150.00	1	Travel Expenses		
Bill Thomas	590 589	Field Person	3/1/76 3/1/76	\$100.00 \$100.00	\$100.00 \$100.00	1 1	Street Campaigning Deposit for Sound Equipment		
Joe Sellers	713 715 A137	Field Person	4/2/76 4/2/76 2/23/76	\$250.00 \$750.00 \$120.00	\$250.00 \$750.00 \$120.00	1 1 1	Reimbursed Expenses Transportation Expenses Travel and Food Expenses		
Peter Kovakos	714 716	Field Person	4/2/76 4/2/76	\$250.00 \$160.00	\$250.00 \$160.00	1 1	Reimbursed Expenses Travel Expenses		

- Type of Documentation: (1) Cancelled check (Committee account to payee) and Committee generated memorandum.
- (2) Cancelled Committee check only.
- (3) Memorandum from payee without cancelled check to the ultimate vendor/payee, or other ultimate vendor/payee documentation.
- (4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.
- (5) Committee effort - letter sent to payee.

Schedule of Unsupported Expenditures as of 5/4/79
 Massachusetts Udall '76 Committee

Payee	Check Number	Payee's Function	Date	Amount of Check	Amount Unsupported as of 5/4/79	Unsupported		Supported	
						Type of * Documents	Intended Purpose per Documents Provided For FEC Inspection	Amount Supported	Type of * Documents
Harriet Fordham	780	Field Person	6/5/76	\$150.00	\$ 150.00	1	Reimbursed Travel Expenses		
Helen Doyle	H-139 605	Field Person	2/18/76 3/1/76	\$235.00 \$260.00	\$ 235.00 \$ 260.00	1 1	Reimbursed Expenses Reimbursed Expenses		
Sue Ambrosewitz	A-136	Field Person	2/23/76	\$250.00	\$ 250.00	1	Reimbursed Expenses		
Total					<u>\$5,822.38</u>				

- Type of Documentation:
- (1) Cancelled check (Committee account to payee) and Committee generated memorandum.
 - (2) Cancelled Committee check only.
 - (3) Memorandum from payee without cancelled check to the ultimate vendor/payee, or other ultimate vendor/payee documentation.
 - (4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.
 - (5) Committee effort - letter sent to payee.

Udall '76 Committee

Attachment 8 Page 1 of 1

Schedule of Unsupported Expenditures as of 5/4/79
Massachusetts Special Events Committee

Payee	Check Number	Payee's Function	Date	Amount of Check	Unsupported		Supported		
					Amount Unsupported as of 5/4/79	Type of * Documents	Intended Purpose per Documents Provided For FEC Inspection	Amount Supported	Type of * Documents
Chester Atkins	-	Field Person	2/26/75	\$800.00	\$ 800.00	5 + 1	Reimbursed Deposit For Parker House Postage Reimbursement		
	-		5/28/75	\$120.00	\$ 120.00	5 + 1			
Linda Hochman	-	Field Person	2/26/75	\$162.00	\$ 162.00	5	Reimbursed Postage		
Total					<u>\$1,082.00</u>				

- Type of Documentation:
- (1) Cancelled check (Committee account to payee) and Committee generated memorandum.
 - (2) Cancelled Committee check only.
 - (3) Memorandum from payee without cancelled check to the ultimate vendor/payee, or other ultimate vendor/payee documentation.
 - (4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.
 - (5) Committee effort - letter sent to payee.

Schedule of Unsupported Expenditures as of 5/4/79
Michigan Udall for President Committee

Payee	Check Number	Payee's Function	Date	Amount of Check	Unsupported		Supported		
					Amount Unsupported as of 5/4/79	Type of * Documents	Intended Purpose per Documents Provided For FEC Inspection	Amount Supported	Type of * Documents
Michigan - Democratic Party	-	Field Group	3/76	\$125.00	\$125.00	1	Fundraising Event		
Al Thompson	-	Field Person	4/16/76	\$ 83.77	\$ 83.77	1 + 7	Reimbursed Field Expense		
Paul Hollingsworth	-	Field Person	4/23/76	\$150.00	\$150.00	1	Reimbursed Field Expense		
	1143		5/7/76	\$175.00	\$175.00	1	Reimbursed Field Expense		
William Algeyes	1291	Field Person	5/11/76	\$200.00	\$200.00	1	Reimbursed Expense - Phones		

- Type of Documentation:
- (1) Cancelled check (Committee account to payee) and Committee generated memorandum.
 - (2) Cancelled Committee check only.
 - (3) Memorandum from payee without cancelled check to the ultimate vendor/payee, or other ultimate vendor/payee documentation.
 - (4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.
 - (5) Committee effort - letter sent to payee.
 - (7) Response received from payee - response inadequate.

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Schedule of Unsupported Expenditures as of 5/4/79
Michigan Udall for President Committee

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Payee	Check Number	Payee's Function	Date	Amount of Check	Amount Unsupported		Type of * Documents	Intended Purpose per Documents Provided For FEC Inspection	Supported	
					as of 5/4/79				Amount Supported	Type of * Documents
Robert Bedard	1717	Field Person	5/19/76	\$384.11	\$384.11		1 + 7	Reimbursed Expenses		
Eddie Burstin	1600	Field Person	5/19/76	\$350.00	\$350.00		1	Reimbursed Expenses		
Prentiss Cox	1427 1430	Field Person	5/14/76 5/19/76	\$246.39 \$177.85	\$246.39 \$154.00		1 1	Reimbursed Expenses Reimbursed Expenses	\$23.85	4
David Cursius	1630 1619	Field Person	5/19/76	\$178.51	\$178.51		1 + 7	Reimbursed Expenses		
Hugh Fox	1368 1375	Field Person	5/14/76	\$130.00	\$130.00		1	Reimbursed Expenses		
David Goldman	-	Field Person	5/19/76	\$152.02	\$152.02		1	Reimbursed Expenses		
Mary Hanley	-	Field Person	5/19/76	\$155.48	\$155.48		1	Reimbursed Expenses-		

- Type of Documentation:
- (1) Cancelled check (Committee account to payee) and Committee generated memorandum.
 - (2) Cancelled Committee check only.
 - (3) Memorandum from payee without cancelled check to the ultimate vendor/payee, or other ultimate vendor/payee documentation.
 - (4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.
 - (5) Committee effort - letter sent to payee.
 - (7) Response received from payee - response inadequate.

Schedule of Unsupported Expenditures as of 5/4/79
Michigan Udall for President Committee

Payee	Check Number	Payee's Function	Date	Amount of Check	Unsupported		Supported		
					Amount Unsupported as of 5/4/79	Type of * Documents	Intended Purpose per Documents Provided For FEC Inspection	Amount Supported	Type of * Documents
Mark Heller -		Field Person	5/19/76	\$101.70	\$101.70	1	Reimbursed Expenses		
Patrice Horstman -		Field Person	5/19/76	\$143.00	\$143.00	1	Reimbursed Expenses		
Peggy Ladner -		Field Person	5/19/76	\$100.45	\$100.45	1	Reimbursed Expenses		
Priscilla Liang -		Field Person	5/7/76	\$125.00	\$125.00	1	Reimbursed Expenses		
			5/19/76	\$139.35	\$139.35	1	Reimbursed Expenses		
Zapopan Mariachi	1443	Field Person	5/14/76	\$175.00	\$175.00	1	Music		
Susan Markus	3010,3011	Field Person	5/11/76	\$115.00	\$115.00	1	Reimbursed Expenses		

- Type of Documentation:
- (1) Cancelled check (Committee account to payee) and Committee generated memorandum.
 - (2) Cancelled Committee check only.
 - (3) Memorandum from payee without cancelled check to the ultimate vendor/payee, or other ultimate vendor/payee documentation.
 - (4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.
 - (5) Committee effort - letter sent to payee.

Schedule of Unsupported Expenditures as of 5/4/79
Michigan Udall for President Committee

<u>Payee</u>	<u>Check Number</u>	<u>Payee's Function</u>	<u>Date</u>	<u>Amount of Check</u>	<u>Amount Unsupported as of 5/4/79</u>	<u>Type of * Documents</u>	<u>Intended Purpose per Documents Provided For FEC Inspection</u>	<u>Supported</u>	
								<u>Amount Supported</u>	<u>Type of * Documents</u>
Mark Millar -		Field Person	5/18/76	\$125.00	\$125.00	1	Reimbursed Expenses		
Susan Nelson-		Field Person	5/19/76	\$123.85	\$123.85	1	Reimbursed Expenses		
Karen Orlansky -		Field Person	5/19/76	\$144.58	\$144.58	1	Reimbursed Expenses		
Glenn Peterson -		Field Person	5/19/76	\$101.55	\$101.55	1	Reimbursed Expenses		
Bruce Reines-		Field Person	5/9/76	\$107.00	\$107.00	1	Reimbursed Expenses		

- Type of Documentation:
- (1) Cancelled check (Committee account to payee) and Committee generated memorandum.
 - (2) Cancelled Committee check only.
 - (3) Memorandum from payee without cancelled check to the ultimate vendor/payee, or other ultimate vendor/payee documentation.
 - (4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.
 - (5) Committee effort - letter sent to payee.

Schedule of Unsupported Expenditures as of 5/4/79
Michigan Udall for President Committee

Payee	Check Number	Payee's Function	Date	Amount of Check	Amount	Type of * Documents	Intended Purpose per Documents Provided For FEC Inspection	Amount	Type of * Documents
					Unsupported as of 5/4/79			Supported	
David Sandalow	- 1304	Field Person	5/13/76	\$102.50	\$102.50	1	Reimbursed Expenses		
			5/12/76	\$140.00	\$140.00	1	Reimbursed Expenses		
Paul Tully-		Field Person	5/17/76	\$130.00	\$130.00	1	Reimbursed Expenses		
David Votrizansky	1392	Field Person	5/14/76	\$275.00	\$275.00	1	Reimbursed Expenses		
	1154		5/7/76	\$137.50	\$137.50	1	Reimbursed Expenses		
	-		5/19/76	\$472.15	\$472.15	1	Reimbursed Expenses		
Bettie Seeman	-	Field Person	5/20/76	\$130.00	\$130.00	1	Advertising		
Betsy Youngholm	1448	Field Person	5/14/76	\$162.47	\$162.47	1	Reimbursed Expenses		
	1391		5/19/76	\$156.35	\$156.35	1	Reimbursed Expenses		

Type of Documentation: (1) Cancelled check (Committee account to payee) and Committee generated memorandum.

(2) Cancelled Committee check only.

(3) Memorandum from payee without cancelled check to the ultimate vendor/payee, or other ultimate vendor/payee documentation.

(4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.

(5) Committee effort - letter sent to payee.

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Schedule of Unsupported Expenditures as of 5/4/79
Michigan Udall for President Committee

Payee	Check Number	Payee's Function	Date	Amount of Check	Amount Unsupported as of 5/4/79	Type of * Documents	Intended Purpose per Documents Provided For FEC Inspection	Supported	
								Amount Supported	Type of * Documents
Mark Youngholm	-	Field	5/13/76	\$155.00	\$155.00	1	Reimbursed Expenses		
		Person	5/18/76	\$643.01	\$643.01	1	Reimbursed Expenses		
Gene Robbins	-	Field	5/19/76	\$229.20	\$229.20	1	Reimbursed Expenses		
		Person							
Gerald Rosenberg	-	Field	5/19/76	\$174.85	\$174.85	1	Reimbursed Expenses		
		Person							
Bryen Wagner	-	Field	5/18/76	\$150.00	\$150.00	1	Band Expense		
		Person							
Dudley Austin	1737	Field	7/17/76	\$115.68	\$115.68	1	Car Rental		
		Person	8/2/76	\$100.00	\$100.00	1	Car Rental		
Mildred Jeffrey	1742	Field	8/8/76	\$908.58	\$908.58	1	Loan Repayment		
		Person	8/2/76	\$135.37	\$135.37	7	Reimbursed Expenses		

- Type of Documentation: (1) Cancelled check (Committee account to payee) and Committee generated memorandum.
- (2) Cancelled Committee check only.
- (3) Memorandum from payee without cancelled check to the ultimate vendor/payee, or other ultimate vendor/payee documentation.
- (4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.
- (5) Committee effort - letter sent to payee.
- (7) Response received from payee - response inadequate.

Schedule of ~~Unsupported Expenditures as of 5/79~~ ^{3,204,123.95}
Michigan Udall for President Committee

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Payee	Check Number	Payee's Function	Date	Amount of Check	<u>Unsupported</u>			<u>Supported</u>	
					Amount Unsupported as of 5/4/79	Type of * Documents	Intended Purpose per Documents Provided For FEC Inspection	Amount Supported	Type of * Documents
Steve Kleespiell	1070	Field Person	5/3/76	\$121.56	\$ 121.56	1	Reimbursed Expenses		
	138	Person	5/6/76	\$100.00	\$ 100.00	1	Reimbursed Expenses		
Mark Brand	1435	Field Person	5/14/76	\$227.00	\$ 227.00	1	Not Itemized		
Mark Youngholm	1440	Field Person	5/14/76	\$315.00	\$ 315.00	1	Not Itemized		
Bob Bedard	1081	Field Person	5/4/76	\$600.00	\$ 600.00	1 + 7	Not Itemized		
Jean Lightfoot	1627	Field Person	5/19/76	\$250.00	\$ 250.00	1	Not Itemized		
Paul Hollingsworth	1659	Field Person	5/19/76	\$150.00	\$ 150.00	1	Not Itemized		
Total Unsupported Expenditures Michigan Udall for President Committee					<u>\$10,066.98</u>				

- Type of Documentation:
- (1) Cancelled check (Committee account to payee) and Committee generated memorandum.
 - (2) Cancelled Committee check only.
 - (3) Memorandum from payee without cancelled check to the ultimate vendor/payee, or other ultimate vendor/payee documentation.
 - (4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.
 - (5) Committee effort - letter sent to payee.
 - (7) Response received from payee - response inadequate

Udall '76 Committee

Attachment 10 Page 1 of 1

Schedule of Unsupported Expenditures as of 5/4/79
New Hampshire Udall '76 Committee

Payee	Check Number	Payee's Function	Date	Amount of Check	Amount Unsupported as of 5/4/79	Unsupported	Supported		
						Type of * Documents	Intended Purpose per Documents Provided For FEC Inspection	Amount Supported	Type of * Documents
David Evans	236	Field Person	9/19/75	\$200.00	\$200.00	1 + 7	Field Advance		
John Carey	714	Field Person	1/31/76	\$102.00	\$102.00	1 + 7	Field Expenses		
Total					<u>\$302.00</u>				

- Type of Documentation:
- (1) Cancelled check (Committee account to payee) and Committee generated memorandum.
 - (2) Cancelled Committee check only.
 - (3) Memorandum from payee without cancelled check to the ultimate vendor/payee, or other ultimate vendor/payee documentation.
 - (4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.
 - (5) Committee effort - letter sent to payee.
 - (7) Response received from payee - response inadequate.

Schedule of Unsupported Expenditures as of 5/4/79
New Jersey Udall '76 Committee

<u>Payee</u>	<u>Check Number</u>	<u>Payee's Function</u>	<u>Date</u>	<u>Amount of Check</u>	<u>Amount Unsupported as of 5/4/79</u>	<u>Type of * Documents</u>	<u>Unsupported</u>	<u>Supported</u>
							<u>Intended Purpose per Documents Provided For FEC Inspection</u>	<u>Amount Supported</u>
Thomas Lindenfeld	122	Field Person	4/2/76	\$105.38	\$105.38	1 + 5	Field Expenses	
David McGuire	155 328	Field Person	4/20/76 5/29/76	\$130.00 \$383.02	\$130.00 \$383.02	1 + 5 1 + 5	Postage Expenses Field Expenses	
Gordon M. Large	442	Treasurer	9/24/76	\$380.00	\$380.00	1 + 7	Field Expenses	
William Harrison	444	Field Person	10/11/76	\$200.43	\$200.43	1 + 5	Expenses-Telephone	

- Type of Documentation:
- (1) Cancelled check (Committee account to payee) and Committee generated memorandum.
 - (2) Cancelled Committee check only.
 - (3) Memorandum from payee without cancelled check to the ultimate vendor/payee, or other ultimate vendor/payee documentation.
 - (4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.
 - (5) Committee effort - letter sent to payee.
 - (7) Response received from payee - response inadequate.

Schedule of Unsupported Expenditures as of 5/4/79
New Jersey Udall '76 Committee

Payee	Check Number	Payee's Function	Date	Amount of Check	Unsupported		Supported		
					Amount Unsupported as of 5/4/79	Type of * Documents	Intended Purpose per Documents Provided For FEC Inspection	Amount Supported	Type of * Documents
Steve Davis	448	Field Person	6/7/76	\$118.46	\$ 118.46	1 + 5	Field Expenses		
Thomas O'Neil	465	Field Person	6/11/76	\$116.87	\$ 116.87	1 + 5	Field Expenses		
Nathan Landan	475	Field Person	6/11/76	\$106.00	\$ 106.00	1 + 5	Field Expenses		
Total					<u>\$1,540.16</u>				

- Type of Documentation:
- (1) Cancelled check (Committee account to payee) and Committee generated memorandum.
 - (2) Cancelled Committee check only.
 - (3) Memorandum from payee without cancelled check to the ultimate vendor/payee, or other ultimate vendor/payee documentation.
 - (4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.
 - (5) Committee effort - letter sent to payee.

Schedule of Unsupported Expenditures as of 5/4/79
New Mexico Udall '76 Committee

Payee	Check Number	Payee's Function	Date	Amount of Check	Unsupported		Supported		
					Amount Unsupported as of 5/4/79	Type of * Documents	Intended Purpose per Documents Provided For FEC Inspection	Amount Supported	Type of * Documents
Jon Mitchell	10	Field Person	5/15/76	\$145.00	\$145.00	1	Reimbursed Expense		
Bert Lindsay	21	Field Person	6/5/76	\$170.03	\$170.03	1	Reimbursed Expense		
Eric S. Jeffries	26	Field Person	6/22/76	\$108.03	\$108.03	1	Reimbursed Expense		
Kurt Moffert	107	Field Person	4/20/76	\$200.00	\$200.00	1	Reimbursed Expenses		
Total					<u>\$623.06</u>				

- Type of Documentation: (1) Cancelled check (Committee account to payee) and Committee generated memorandum.
- (2) Cancelled Committee check only.
- (3) Memorandum from payee without cancelled check to the ultimate vendor/payee, or other ultimate vendor/payee documentation.
- (4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.
- (5) Committee effort - letter sent to payee.

Schedule of Unsupported Expenditures as of 5/4/79
New York Udall '76 Committee

Payee	Check Number	Payee's Function	Date	Amount of Check	Unsupported		Supported		
					Amount Unsupported as of 5/4/79	Type of * Documents	Intended Purpose per Documents Provided For FEC Inspection	Amount Supported	Type of * Documents
Linda Davidoff	188	Field Person	2/17/76	\$440.00	\$440.00	1	Field Expenses		
Mitchell Miller	166	Field Person	5/4/76	\$468.00	\$468.00	1 + 5	Reimbursed Expense-Postage		
Norman Long	180	Field	5/12/76	\$ 95.00	\$ 95.00	1	Field Expenses		
	186	Person	5/24/75	\$ 55.00	\$ 55.00	1	Field Expenses		
	191		6/15/76	\$ 25.00	\$ 25.00	1	Field Expenses		
	576		7/7/76	\$200.00	\$200.00	1	Field Expenses		
	237		3/8/76	\$206.72	\$206.72	1	Field Expenses		
	249		3/8/76	\$150.00	\$150.00	1	Travel Expenses		
	281		3/13/76	\$100.00	\$100.00	1	Travel Expenses		
	365		3/24/76	\$125.00	\$125.00	1	Field Salaries - 5 workers		
	389		3/28/76	\$125.00	\$125.00	1	Travel Expenses -5 workers		
	421		4/3/76	\$100.00	\$100.00	1	Field Salaries - 4 workers		
161		4/25/76	\$ 60.00	\$ 60.00	1	Telephone Expense			

- Type of Documentation:
- (1) Cancelled check (Committee account to payee) and Committee generated memorandum.
 - (2) Cancelled Committee check only.
 - (3) Memorandum from payee without cancelled check to the ultimate vendor/payee, or other ultimate vendor/payee documentation.
 - (4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.
 - (5) Committee effort - letter sent to payee.

Schedule of Unsupported Expenditures as of 5/4/79
New York Udall '76 Committee

Payee	Check Number	Payee's Function	Date	Amount of Check	Amount Unsupported as of 5/4/79	Type of * Documents	Intended Purpose per Documents Provided For FEC Inspection	Supported	
								Amount Supported	Type of * Documents
Matlea Menzie	236	Field Person	3/8/76	\$200.00	\$200.00	1 + 5	Field Expense-Phone Deposit		
Carol Hess	211	Field Person	3/2/76	\$124.69	\$124.69	1 + 5	Field Expenses		
	298		3/16/76	\$ 19.67	\$ 19.67	1 + 5	Field Expenses		
	99		4/2/76	\$290.00	\$290.00	1 + 5	Petty Cash Advance		
Joan Wiener	244	Financial	3/10/76	\$175.00	\$175.00	1	Campaign Expenses		
	290	Coordinator	3/16/76	\$200.00	\$200.00	1	Campaign Expenses		
	6		3/23/76	\$200.00	\$200.00	1	Printing		
	319		3/19/76	\$200.00	\$200.00	1	Mailing		
Jack Vane	285	Field Person	3/15/76	\$200.00	\$200.00	1 + 5	Field Expenses		

- Type of Documentation:
- (1) Cancelled check (Committee account to payee) and Committee generated memorandum.
 - (2) Cancelled Committee check only.
 - (3) Memorandum from payee without cancelled check to the ultimate vendor/payee, or other ultimate vendor/payee documentation.
 - (4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.
 - (5) Committee effort - letter sent to payee.

Schedule of Unsupported Expenditures as of 5/4/79
New York Udall '76 Committee

Payee	Check Number	Payee's Function	Date	Amount of Check	Unsupported		Supported		
					Amount Unsupported as of 5/4/79	Type of * Documents	Amount Supported	Type of * Documents	
John Varney	46	Field Person	3/29/76	\$100.00	\$100.00	1, 5 + 7	Supplies		
Virginia Witt	469	Field Person	4/6/76	\$ 75.00	\$ 75.00	1	Travel Expenses		
Edward Hickey	470 490	Field Person	4/6/76 4/13/76	\$125.00 \$125.00	\$125.00 \$125.00	1 1	Travel Expenses Travel Expenses		
Shirley A. Briggs	15 474	Field Person	3/25/76 4/6/76	\$200.00 \$ 14.77	\$200.00 \$ 14.77	1 + 5 1 + 5	Reimbursed Expense-Supplies Reimbursed Expense-Supplies		
Virginia Hennessey	29	Field Person	3/26/76	\$104.16	\$104.16	1 + 5	Petty Cash Fund		

- Type of Documentation:
- (1) Cancelled check (Committee account to payee) and Committee generated memorandum.
 - (2) Cancelled Committee check only.
 - (3) Memorandum from payee without cancelled check to the ultimate vendor/payee, or other ultimate vendor/payee documentation.
 - (4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.
 - (5) Committee effort - letter sent to payee.
 - (7) Response received from payee - response inadequate.

Schedule of Unsupported Expenditures as of 5/4/79
New York Udall '76 Committee17
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Payee	Check Number	Payee's Function	Date	Amount of Check	Unsupported		Supported			
					Amount Unsupported as of 5/4/79	Type of * Documents	Intended Purpose per Documents Provided For FEC Inspection	Amount Supported	Type of * Documents	
Herman	324	Field	3/21/76	\$100.00	\$ 100.00	1	Supplies			
Walz	358	Person	3/23/76	\$260.66	\$ 260.66	1	Mailing Supplies			
Ron Kennedy	361	Field Person	3/23/76	\$100.00	\$ 100.00	1 + 5	Petty Cash Advance			
Libby	338	Field	3/23/76	\$100.00	\$ 100.00	1 + 5	Travel Expenses			
Moroff	349	Person	3/23/76	\$ 50.00	\$ 50.00	1 + 5	Travel Expenses			
	414		4/2/76	\$ 50.00	\$ 50.00	1 + 5	Supplies			
Greg Collins	413	Field Person	4/2/76	\$108.00	\$ 108.00	1	Advance Expenses			
Total						<u>\$5,271.67</u>				

- Type of Documentation:
- (1) Cancelled check (Committee account to payee) and Committee generated memorandum.
 - (2) Cancelled Committee check only.
 - (3) Memorandum from payee without cancelled check to the ultimate vendor/payee, or other ultimate vendor/payee documentation.
 - (4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.
 - (5) Committee effort - letter sent to payee.

Schedule of Unsupported Expenditures as of 5/4/79
Ohio Udall '76 Committee

Payee	Check Number	Payee's Function	Date	Amount of Check	Unsupported		Supported	
					Amount Unsupported as of 5/4/79	Type of * Documents	Amount Supported	Type of * Documents
Al Thompson	1186	Field	5/27/76	\$200.00	\$200.00	1 + 7	Cleveland-Cash	
	1001	Person	5/28/76	\$200.00	\$200.00	2 + 7	Petty Cash	
	1221		6/4/76	\$300.00	\$300.00	1 + 7	Petty Cash	
	1325		6/9/76	\$200.00	\$200.00	1 + 7	Petty Cash	
Bernie Hagerty	1099	Field	6/2/76	\$105.00	\$105.00	1	Petty Cash	
		Person						
Roger Anderson	1186	Field Person	6/3/76	\$500.00	\$500.00	1	Reimbursed Expense-Phone Deposit	
John M. Quinn	1206	Field Person	6/3/76	\$125.00	\$125.00	1 + 7	Field Expenses	

- Type of Documentation:
- (1) Cancelled check (Committee account to payee) and Committee generated memorandum.
 - (2) Cancelled Committee check only.
 - (3) Memorandum from payee without cancelled check to the ultimate vendor/payee, or other ultimate vendor/payee documentation.
 - (4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.
 - (5) Committee effort - letter sent to payee.
 - (7) Response received from payee - response inadequate.

Schedule of Unsupported Expenditures as of 5/4/79
Ohio Udall '76 Committee

Payee	Check Number	Payee's Function	Date	Amount of Check	Unsupported		Supported		
					Amount Unsupported as of 5/4/79	Type of * Documents	Intended Purpose per Documents Provided For FEC Inspection	Amount Supported	Type of * Documents
Jerome Rampelt	1218	Creditor	6/3/76	\$540.00	\$540.00	1	Loan Repayment		
David Goldman	1121	Field Person	5/24/76	\$330.00	\$330.00	1	Start-up (13th)		
	1274		6/5/76	\$195.95	\$195.95	1			
Mark Youngholm	1315	Field Person	6/8/76	\$130.00	\$130.00	1	Turnaround		
Dora Corrado	1326	Field Person	6/9/76	\$280.00	\$280.00	1	Columbus-Cash		
	1341		6/9/76	\$750.00	\$750.00	1	Travel Advance		
Sheldon Schecter	1007	Field Person	4/22/76	\$260.00	\$260.00	1 + 7	Reimbursed Expense-Stamp		
22nd Dist. Canvass	1029	Field Group	5/4/76	\$150.00	\$150.00	1	Phone and Rent		

- Type of Documentation:
- (1) Cancelled check (Committee account to payee) and Committee generated memorandum.
 - (2) Cancelled Committee check only.
 - (3) Memorandum from payee without cancelled check to the ultimate vendor/payee, or other ultimate vendor/payee documentation.
 - (4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.
 - (5) Committee effort - letter sent to payee.
 - (7) Response received from payee - response inadequate.

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 Schedule of Unsupported Expenditures as of 5/4/79
 Ohio Udall '76 Committee

Payee	Check Number	Payee's Function	Date	Amount of Check	Unsupported		Supported	
					Amount Unsupported as of 5/4/79	Type of * Documents	Intended Purpose per Documents Provided For FEC Inspection	Amount Supported
Cash	1042	Cash	5/7/76	\$150.00	\$ 150.00	1	Car Rental	
	1090		5/21/76	\$200.00	\$ 200.00	1	Materials	
	1094		5/21/76	\$300.00	\$ 300.00	1		
Clifford Page	1127	Field Person	5/24/76	\$126.42	\$ 126.42	1	Reimbursed Expense-Photos	
Michael Heller	1133	Field Person	5/24/76	\$300.00	\$ 300.00	1	Start-up (19th)	
Amy Marasco	1138	Field Person	5/26/76	\$500.00	\$ 500.00	1	Petty Cash-Misc.	
	1175		5/26/76	\$300.00	\$ 300.00	1	Petty Cash	
Bradley Suter	1139	Field Person	5/24/76	\$106.40	\$ 106.40	1	Field Expenses	
Total					\$6,248.77			

- Type of Documentation:
- (1) Cancelled check (Committee account to payee) and Committee generated memorandum.
 - (2) Cancelled Committee check only.
 - (3) Memorandum from payee without cancelled check to the ultimate vendor/payee, or other ultimate vendor/payee documentation.
 - (4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.
 - (5) Committee effort - letter sent to payee.

Udall '76 Committee

Attachment 15 Page 1 of 1

Schedule of Unsupported Expenditures as of 5/4/79
Oregon Udall '76 Committee

<u>Payee</u>	<u>Check Number</u>	<u>Payee's Function</u>	<u>Date</u>	<u>Amount of Check</u>	<u>Unsupported</u>		<u>Supported</u>			
					<u>Amount Unsupported as of 5/4/79</u>	<u>Type of * Documents</u>	<u>Intended Purpose per Documents Provided For FEC Inspection</u>	<u>Amount Supported</u>	<u>Type of * Documents</u>	
Andy Bromeland	86	Field Person	5/20/76	\$109.50	\$109.50	1	Field Expenses			
Total						<u>\$109.50</u>				

- Type of Documentation:
- (1) Cancelled check (Committee account to payee) and Committee generated memorandum.
 - (2) Cancelled Committee check only.
 - (3) Memorandum from payee without cancelled check to the ultimate vendor/payee, or other ultimate vendor/payee documentation.
 - (4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.
 - (5) Committee effort - letter sent to payee.

Schedule of Unsupported Expenditures as of 5/4/79
Pennsylvania Udall '76 Committee

Payee	Check Number	Payee's Function	Date	Amount of Check	Unsupported		Supported		
					Amount Unsupported as of 5/4/79	Type of * Documents	Intended Purpose per Documents Provided For FEC Inspection	Amount Supported	Type of * Documents
Mark Raith	-	Field Person	2/11/76	\$205.00	\$205.00	1	Postage		
Joseph Certaine	101	Field Person	2/14/76	\$125.00	\$125.00	1	Personal Services		
Paul Tully	-	Field Person	4/20/76	\$170.00	\$170.00	1	Field Expenses		
Mike Kurman	-	Field Person	5/76	\$115.00	\$115.00	1	Per Diem Reimbursement		

- Type of Documentation:
- (1) Cancelled check (Committee account to payee) and Committee generated memorandum.
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 - (4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.
 - (5) Committee effort - letter sent to payee.

Schedule of Unsupported Expenditures as of 5/4/79
Pennsylvania Udall '76 Committee

Payee	Check Number	Payee's Function	Date	Amount of Check	Amount Unsupported as of 5/4/79	Unsupported		Supported	
						Type of * Documents	Intended Purpose per Documents Provided For FEC Inspection	Amount Supported	Type of * Documents
Jack Martin	21	Field Person	4/19/76	\$ 150.00	\$ 150.00	2	Scranton-Wilkes Barre Exp.		
Bob Bedard	315	Field Person	4/19/76	\$1,500.00	\$1,500.00	2	Pittsburgh Field Operations		
			4/26/76	\$1,300.00	\$1,300.00	2	Pittsburgh Field Operations		
Dave Evans	-	Field Person	4/23/76	\$ 500.00	\$ 500.00	2 + 7	Harrisburg Field Operations		
			4/22/76	\$ 650.00	\$ 650.00	2 + 7	Harrisburg Field Operations		
Mary Shannahan	-	Field Person	4/20/76	\$ 400.00	\$ 400.00	2	Erie		
	278		4/16/76	\$ 300.00	\$ 300.00	2	Operating Erie		
Bill Wachtel	-	Field Person	4/26/76	\$ 400.00	\$ 400.00	2	Phila Suburban Vol. Exps.		
	34		4/24/76	\$1,500.00	\$1,500.00	2	Election Day Expenses		

Type of Documentation: (1) Cancelled check (Committee account to payee) and Committee generated memorandum.

(2) Cancelled Committee check only.

(3) Memorandum from payee without cancelled check to the ultimate vendor/payee, or other ultimate vendor/payee documentation.

(4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.

(5) Committee effort - letter sent to payee.

(7) Response received from payee - response inadequate.

Schedule of Unsupported Expenditures as of 5/4/79
 Pennsylvania Udall '76 Committee
 Schedule of Checks Payable to Cash

Signatory	Check Number	Payee's Function	Date	Amount of Check	Amount Unsupported as of 5/4/79	Type of * Documents	Intended Purpose per Documents Provided For FEC Inspection	Supported	
								Amount Supported	Type of * Documents
Gerald E. McLaughlin	246	Field Person	4/15/76	\$400.00	\$ 400.00	2	Cash on Hand		
	377		4/23/76	\$900.00	\$ 900.00	2	Election Day Expenses		
	394		4/26/76	\$350.00	\$ 350.00	2	Volunteer Expenses		
	397		4/26/76	\$400.00	\$ 400.00	2	Check cashing, etc.		
	398		4/26/76	\$180.00	\$ 180.00	2	Certified Check-Pittsburgh		
	235		4/14/76	\$120.00	\$ 120.00	2	Greyhound-COD from Wisconsin		
	316		4/20/76	\$565.00	\$ 565.00	2	Postage-LaSalle Ad. Expense		
	331		4/21/76	\$400.00	\$ 400.00	2	Advance-Gas, Scheduling Sup.		
	243		4/15/76	\$385.00	\$ 385.00	2	April 17 Expenses		
	102		2/17/76	\$130.00	\$ 130.00	2	Delegate Filing Fees		
	346		4/22/76	\$375.00	\$ 375.00	2	Harrisburg: 1/22-23		
Total					<u>\$11,520.00</u>				

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- (5) Committee effort - letter sent to payee.

Schedule of Unsupported Expenditures as of 5/4/79
Udall '76 South Dakota

Payee	Check Number	Payee's Function	Date	Amount of Check	Unsupported		Supported		
					Amount Unsupported as of 5/4/79	Type of * Documents	Intended Purpose per Documents Provided For FEC Inspection	Amount Supported	Type of * Documents
Jim Kornreich	108	Field Person	5/20/76	\$125.00	\$125.00	1 + 5	Field Advance		
Greg Abbott	224	Field Person	5/26/76	\$160.00	\$160.00	1 + 5	Reimbursement for Stamps		
Total					<u>\$285.00</u>				

- Type of Documentation:
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 - (4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.
 - (5) Committee effort - letter sent to payee.
 - (7) Response received from payee - response inadequate.

Schedule of Unsupported Expenditures as of 5/4/79
Wisconsin Udall '76 Committee

Payee	Check Number	Payee's Function	Date	Amount of Check	Unsupported		Supported	
					Amount Unsupported as of 5/4/79	Type of * Documents	Amount Supported	Type of * Documents
Cash	326	Gary Mischich Endorser	12/17/75	\$400.00	\$400.00	1	Stamps	
Cash	757	John Doherty Endorser	3/13/76	\$300.00	\$300.00	1 + 5	Advance - Petty Cash	
Cash	929	Charles Ward Endorser	3/23/76	\$150.00	\$150.00	1	Adv. Exp.	
Cash	939	Erich Daub Endorser	3/24/76	\$150.00	\$150.00	1	Adv. Gas Exp.	

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 - (4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.
 - (5) Committee effort - letter sent to payee.

Schedule of Unsupported Expenditures as of 5/4/79
Wisconsin Udall '76 Committee

Payee	Check Number	Payee's Function	Date	Amount of Check	Unsupported		Supported		
					Amount Unsupported as of 5/4/79	Type of * Documents	Intended Purpose per Documents Provided For FEC Inspection	Amount Supported	Type of * Documents
Cash	981	Benjamin McCready Endorser	3/25/76	\$150.00	\$150.00	1	Advance Expenses		
Cash	1203	Terry Farmers Endorser	4/2/76	\$175.00	\$175.00	1 + 5	Advance Expenses		
Cash	1213	William Bussey Endorser	4/2/76	\$200.00	\$200.00	1 + 7	Petty Cash Fund		
Cash	1329	William Wachtel Endorser	4/4/76	\$120.00	\$120.00	1 + 7	Petty Cash		

- Type of Documentation:
- (1) Cancelled check (Committee account to payee) and Committee generated memorandum.
 - (2) Cancelled Committee check only.
 - (3) Memorandum from payee without cancelled check to the ultimate vendor/payee, or other ultimate vendor/payee documentation.
 - (4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.
 - (5) Committee effort - letter sent to payee.
 - (7) Response received from payee - response inadequate.

Schedule of Unsupported Expenditures as of 5/4/79
Wisconsin Udall '76 Committee

Payee	Check Number	Payee's Function	Date	Amount of Check	Unsupported		Supported	
					Amount Unsupported as of 5/4/79	Type of * Documents	Amount Supported	Type of * Documents
Cash	120	Robert Berman Endorser	8/19/75	\$200.00	\$200.00	1	Advance-Bedard Expenses	
Robert Berman	14 124	Field Person	7/30/76 8/22/75	\$138.00 \$420.00	\$138.00 \$420.00	1 1	Reimbursed Expenses Expenses	
David Crusius	531 585 697	Field Person	2/26/76 3/2/76 3/10/76	\$100.00 \$268.00 \$200.00	\$100.00 \$268.00 \$200.00	1 + 7 1 + 7 1 + 7	Advance on Expenses Mileage and Expenses Advance Expenses	
Joe Molina	1120	Field Person	3/30/76	\$100.00	\$100.00	1	Petty Cash	
Ernest Schaefer	705	Field Person	3/11/76	\$150.00	\$150.00	1 + 5	Waukesha Hqs.	
Robert Bedard	2 38 480	Field Person	7/18/75 8/15/75 2/12/76	\$300.00 \$400.00 \$200.00	\$300.00 \$400.00 \$200.00	3 + 7 1 + 7 1 + 7	Reimbursed Expenses Expense Advance Reimbursed Expenses	

- Type of Documentation: (1) Cancelled check (Committee account to payee) and Committee generated memorandum.
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- (4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.
- (5) Committee effort - letter sent to payee.
- (7) Response received from payee - response inadequate.

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Schedule of Unsupported Expenditures as of 5/4/79
Wisconsin Udall '76 Committee

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Payee	Check Number	Payee's Function	Date	Amount of Check	Unsupported		Supported		
					Amount Unsupported as of 5/4/79	Type of * Documents	Intended Purpose per Documents Provided For FEC Inspection	Amount Supported	Type of * Documents
Lorna Miller	39	Field Person	8/28/75	\$395.00	\$395.00	1	Reimbursed Expenses		
Veronica Daniels	328	Field Person	12/19/75	\$198.00	\$198.00	1	Reimbursed Expenses		
Michael Mullen	332	Field Person	12/20/75	\$196.00	\$196.00	1			
Helen E. Doyle	907	Field Person	3/22/76	\$240.00	\$240.00	1	Advertising and Voter Lists		
Alan Slomowitz	1114	Field Person	3/29/76	\$200.00	\$200.00	1 + 5	Petty Cash		

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 - (4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.
 - (5) Committee effort - letter sent to payee.

Schedule of Unsupported Expenditures as of 5/4/79
Wisconsin Udall '76 Committee

Payee	Check Number	Payee's Function	Date	Amount of Check	Unsupported		Supported	
					Amount Unsupported as of 5/4/79	Type of * Documents	Amount Supported	Type of * Documents
Duane Chattin	1207	Field Person	4/2/76	\$ 200.00	\$ 200.00	1	Petty Cash	
Martin Hanson	1449	Field Person	4/8/76	\$ 555.33	\$ 555.33	1	Reimbursed Expenses	
Morris Rubin	1451	Field Person	4/8/76	\$ 428.62	\$ 428.62	1	Reimbursed Expenses	
David Sandalow	1488	Field Person	4/9/76	\$ 338.00	\$ 338.00	1	Reimbursed Expenses	
Warner Jones	1156	Field Person	4/1/76	\$ 300.00	\$ 300.00	1 + 5	Advance Expenses	
Total					<u>\$7,171.95</u>			

- Type of Documentation:
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 - (4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.
 - (5) Committee effort - letter sent to payee.

Schedule of Unsupported Expenditures as of 5/4/79
Udall '76 Committee

Payee	Check Number	Payee's Function	Date	Amount of Check	Unsupported		Supported		
					Amount Unsupported as of 5/4/79	Type of * Documents	Intended Purpose per Documents Provided For FEC Inspection	Amount Supported	Type of * Documents
Lori Udall	543	Field Person	7/25/75	\$200.00	\$200.00	1	Not Reported		
William Christian		Field Person	11/14/75	\$129.14	\$129.14	1 + 7	Not Reported		
Paul Tully	769 883	Field Person	10/2/75 10/31/75	\$200.00 \$100.00	\$200.00 \$100.00	1 1	Travel Advance Travel Advance		
Mark Brand	614 639	Field Person	11/7/75 11/21/75	\$100.00 \$128.90	\$100.00 \$128.90	1 + 5 1 + 5	Travel Advance Reimbursed Travel		

- Type of Documentation:
- (1) Cancelled check (Committee account to payee) and Committee generated memorandum.
 - (2) Cancelled Committee check only.
 - (3) Memorandum from payee without cancelled check to the ultimate vendor/payee, or other ultimate vendor/payee documentation.
 - (4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.
 - (5) Committee effort - letter sent to payee.
 - (7) Response received from payee - response inadequate.

Schedule of Unsupported Expenditures as of 5/4/79
Udall '76 Committee

Payee	Check Number	Payee's Function	Date	Amount of Check	Amount Unsupported as of 5/4/79	Unsupported		Supported	
						Type of * Documents	Intended Purpose per Documents Provided For FEC Inspection	Amount Supported	Type of * Documents
Michael Kurman	504	Field Person	10/10/75	\$214.27	\$214.27	1 + 5	Reimbursed Expenses		
			10/20/75	\$120.35	\$120.35	1 + 5	Reimbursed Expenses		
Ann Udall	516	Field Person	10/13/75	\$100.00	\$100.00	1	Travel Advance		
	561		10/22/75	\$150.00	\$150.00	1	Travel Advance		
	780		10/5/75	\$500.00	\$500.00	1	Not Reported		
John M. Quinn	1759	Field Person	5/5/76	\$109.00	\$109.00	1 + 7	Not Reported		
Greg Andrews	2790	Field Person	7/16/76	\$114.00	\$ 78.00	1, 5 + 7	Reimbursement	\$36.00	4
Charles Chesney	725	Field Person	12/8/75	\$100.00	\$100.00	1	Travel Advance		

- Type of Documentation:
- (1) Cancelled check (Committee account to payee) and Committee generated memorandum.
 - (2) Cancelled Committee check only.
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 - (4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.
 - (5) Committee effort - letter sent to payee.
 - (7) Response received from payee - response inadequate.

Schedule of Unsupported Expenditures as of 5/4/79
Udall '76 Committee

Payee	Check Number	Payee's Function	Date	Amount of Check	Unsupported		Supported		
					Amount Unsupported as of 5/4/79	Type of * Documents	Intended Purpose per Documents Provided For FEC Inspection	Amount Supported	Type of * Documents
Edward Coyle	1688	Field Person	3/18/76	\$206.19	\$ 206.19	1 + 7	Travel Reimbursement		
Rick Burzon	2685	Field Person	7/1/76	\$148.00	\$ 148.00	1	Travel Expenses		
Jane Watkins	DM	Field Person	7/15/76	\$250.00	\$ 250.00	1, 5 + 7	Travel Expense		
Illinois Udall '76 Committee			3/76	\$750.00	\$ 750.00	1	Transfer		
Total						<u>\$3,583.85</u>			

- Type of Documentation:
- (1) Cancelled check (Committee account to payee) and Committee generated memorandum.
 - (2) Cancelled Committee check only.
 - (3) Memorandum from payee without cancelled check to the ultimate vendor/payee, or other ultimate vendor/payee documentation.
 - (4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.
 - (5) Committee effort - letter sent to payee.
 - (7) Response received from payee - response inadequate.

Schedule of Unsupported Expenditures as of 5/4/79
Washington Citizens for Udall '76

Payee	Check Number	Payee's Function	Date	Amount of Check	Amount Unsupported as of 5/4/79	Unsupported	
						Type of Documents *	Intended Purpose per Documents Provided For FEC Inspection
Postmaster	9	Vendor	1/8/76	\$125.00	\$ 125.00	6	Stamps
	None Recorded		1/8/76	211.91	211.91	6	Stamps
	20		2/10/76	225.00	225.00	6	Stamps
	21		2/12/76	100.00	100.00	6	Stamps
	22		2/12/76	40.98	40.98	6	Stamps
	25		2/20/76	600.00	600.00	6	Stamps
	28		2/20/76	78.00	78.00	6	Stamps
30	2/27/76	39.00	39.00	6	Stamps		
Dick Kelley	10	Employee	1/14/76	500.00	500.00	6 + 7	Salary
	13		1/29/76	39.19	39.19	6 + 7	Expenses
	14		1/29/76	50.00	50.00	6 + 7	Salary
	18		2/5/76	50.00	50.00	6 + 7	Salary
	19		2/5/76	10.00	10.00	6 + 7	Supplies
	23		2/12/76	100.00	100.00	6 + 7	Salary
	26		2/20/76	525.00	525.00	6 + 7	Salary
31	2/27/76	300.00	300.00	6 + 7	Salary		

Documentation: (6) No cancelled check at time of audit.

(7) Response received from payee - response inadequate.

Schedule of Unsupported Expenditures as of 5/4/79
Washington Citizens for Udall '76

Payee	Check Number	Payee's Function	Date	Amount of Check	Amount Unsupported as of 5/4/79	Unsupported	
						Type of Documents *	Intended Purpose per Documents Provided For FEC Inspection
Pacific Telephone	11	Vendor	1/23/76	\$320.00	\$ 320.00	6	Telephone installation and deposit
Smith Tower	12	Vendor	1/23/76	\$180.50	\$ 180.50	6	Office Rent
State of Washington	15	Government	1/29/76	15.75	15.75	6	Payroll taxes
IRS	16	Government	1/29/76	61.43	61.43	6	Payroll taxes
Holiday Inn None Recorded		Vendor	1/8/76	20.48	20.48	6	Distribute fundraising materials
Seattle Rubber Stamp Co.	17	Vendor	2/5/76	11.43	11.43	6	Rubber stamp
	29		2/20/76	5.69	5.69	6	Rubber stamp
North Seattle Printing Co.	24	Vendor	2/10/76	250.00	250.00	6	Printing
Deanna Wagner	20	Field Person	2/20/76	23.36	<u>23.36</u>	6	Supplies
Total Unsupported Expenditures Washington Citizens for Udall '76					<u>\$3,882.72</u>		

Documentation: (6) No cancelled check at time of audit.

Udall



MEMORANDUM TO THE COMMISSIONERS
FEDERAL ELECTION COMMISSION

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

June 11, 1979

MEMORANDUM

TO : THE COMMISSIONERS
THROUGH : ORLANDO B. POTTER *OBP*
STAFF DIRECTOR
FROM : BOB COSTA *RJC*
SUBJECT : UDALL '76 AUDIT REPORT

Attached please find a copy of the Audit Report on the Udall '76 Committee and affiliates. The report has been changed as follows:

A. The substance of the findings referred to the Office of General Counsel during the June 7, 1979 Executive Session have been deleted. In place of these findings is a statement that matters have been referred which is consistent with the statement contained in the Harris Fox President report approved on May 17, 1979.

B. Finding A.1

The recommendation has been changed to reflect the Commission determination that no further action is required.

C. Finding A.3

The recommendation has been changed to reflect the Commission determination that the value of the remaining uncashed refund checks should be returned to Representative Udall's Congressional Committee.

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Johnson

MEMORANDUM TO THE COMMISSIONERS
Page 2

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543



MEMORANDUM

D. Finding B.2

The recommendation has been changed to reflect the Commission's determination that those expenditures with a listed purpose as "Consulting Fee" totaling \$850.00 are qualified campaign expenses. These items have been deleted from the schedule of unsupported expenditures (Attachment 1 Pages 1 and 2 of 3).

E. As has been the past practice, the names of the individual payees of unsupported expenditures have been deleted with a designation such as "fieldperson" added.

For informational purposes the Committee's responses to the Commission's preliminary determinations and the legal analysis are attached. However, as has been past practice, these items would be deleted before public release.

This report is being circulated for a tally vote. If approved the report will be transmitted to the candidate followed by public release. If an objection is received I recommend the matter be placed on the next Executive Session agenda.

If you have any questions please contact Joe Stoltz or Glen Buco on extension 3-4155.

Attachment as stated

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FEDERAL ELECTION COMMISSION

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

INTERIM REPORT OF THE AUDIT DIVISION
ON THE UDALL '76 COMMITTEE

I. Background

This interim report covers an audit of the Udall '76 Committee and 27 affiliated committees undertaken by the Audit Division to determine whether there has been compliance with the provisions of The Federal Election Campaign Act of 1971, as amended ("the Act"). The audit was conducted pursuant to Section 438(a)(8) of the Act and Section 9038(a) of Chapter 96 of the Internal Revenue Code of 1954. Section 438(a)(8) of the Act directs the Commission "to make from time to time audits and field investigations with respect to reports and statements filed under the provisions of this chapter and with respect to alleged failures to file any report or statement required under the provisions of this chapter, and to give priority to auditing and field investigating of the verification for, and the receipt and use of, any payments received by a candidate under Chapter 96 of the Internal Revenue Code of 1954." Section 9038(a) of Chapter 96 states, "after each matching payment period, the Commission shall conduct a thorough examination and audit of the qualified campaign expenses of every candidate and his authorized committees who received payments under Section 9037."

The Udall '76 Committee ("the Committee") was designated as the principal campaign committee by the Honorable Morris K. Udall, and registered with the United States General Accounting Office on August 21, 1974.

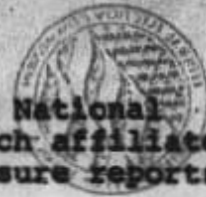
Thomas Chandler, Jack Sakrison, Elias M. Romley and James Patrick Sr., were Co-Chairmen of the Committee from inception until November 26, 1975 when Stewart L. Udall was appointed National Campaign Manager and John Michael Quinn was appointed National Campaign Director. Stewart L. Udall was designated Chairman of the Committee on September 15, 1976.

Harry G. Karchmer was Treasurer of the Committee from inception until February 5, 1975 when Stanley Kurz was appointed Treasurer.



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FEDERAL ELECTION COMMISSION



The Udall '76 Committee is comprised of the National Committee and 30 state and local committees. Each affiliated committee had its own treasurer and filed disclosure reports separately from the National Committee.

The following 27 affiliated committees were audited:

<u>Committee</u>	<u>Appendix</u>	<u>Report Page</u>	<u>Title 26 List</u>
Alaska Udall '76 Committee			
Udall '76 Committee - Arizona	A	24	
Udall '76 California Committee	B	25	41
Colorado Udall '76 Committee			
Connecticut Udall '76 Committee			44
D. C. Committee for Udall			45
Georgians for Udall			
Illinois Udall '76 Committee	C	26	
Iowa Udall '76 Committee			46
Kentucky Udall '76 Committee			47
Udall Maryland Campaign	D	27	48
Massachusetts Udall '76 Committee	E	28	50
Udall '76 Massachusetts Special Events Committee	F	29	55
Michigan Udall for President Committee	G	30	56
Udall '76-Missouri	H	31	
Nebraska Udall for President Committee			
New Hampshire Udall '76 Committee	I	32	63
New Jersey Udall '76 Committee	J	33	64
New Mexico Udall '76 Committee	K	34	66
New York Udall '76 Committee	L	35	67
Udall '76 Committee - Ohio	M	36	71
Oregon Udall '76 Committee	N	37	74
Pennsylvania Udall '76 Committee	O	38	75
Udall '76 South Dakota			78
Udall '76-Vermont			
Washington Citizens for Udall '76	P	39	87
Wisconsin Udall '76 Committee	Q	40	79

Those affiliated committees with a referenced appendix have findings and conclusions which require further consideration by the Commission.

The remaining three (3) affiliated committees that were not audited received no transfers from the National Committee and had reported \$1,518.02 in combined receipts.

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The audit covers the period from January 1, 1975 through June 30, 1978. The Committee and its affiliates reported a combined beginning cash balance of \$8,465.10, total receipts (less inter-Committee transfers) of \$5,181,375.39, total expenditures (less inter-Committee transfers) of \$5,166,015.37 and ending cash of \$16,835.52 on March 31, 1978. 1/

The difference between the calculated ending cash of \$23,825.12 and reported ending cash of \$16,835.52 is \$6,989.60. This difference is composed of the following elements:

- a. Ending cash reported by affiliated state committees at termination \$ 986.51
- b. Incorrect arithmetic calculations of reported totals by affiliated state committees 3,884.73
- c. Difference between reported transfers of the National Committee and affiliated state committees 2,118.36

Difference Between Reported and Calculated Ending Cash \$6,989.60

This audit report is based on documents and working papers supporting each of its factual statements. They form part of the record upon which the Commission based its decisions on the matters in this report, and were available to Commissioners and appropriate staff for review.

II. Findings and Conclusions

A. Title II Reporting and Recordkeeping

1. Contribution Limitations

Section 441a(a)(1)(A), of Title 2, United States Code, prohibits a person from making contributions to any candidate and his authorized political committees with respect to any election for Federal office which, in the aggregate, exceed \$1,000.

Twenty (20) contributors, who had exceeded the \$1,000 contribution limitation were identified during the review of the Committee's matching fund submission and the Schedule A's filed with its disclosure reports. The total value of the excessive portion of these contributions is \$5,612.00.

1/ The Committee filed a FEC Form 3a for the second quarter of 1978.

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On November 15, 1978, the Commission determined that the Committee was required to refund the excessive contributions and submit to the Audit staff copies of both sides of the refund checks or provide an explanation to clarify the apparent excessive contributions.

To date the Committee has supplied documentation to show that refunds have been made to the 20 contributors, but have not provided evidence of negotiation of the check for six (6) of these refunds totaling \$1,612.00. The Committee has stated that difficulty in obtaining a current address, and unanswered letters account for three (3) of the incomplete transactions.

Recommendation

We recommend no further action.

2. Supporting Documentation for Expenditures

Section 432(d) of Title 2, United States Code, requires the treasurer to obtain and keep a receipted bill, stating the particulars, for every expenditure made by or on behalf of a political committee in excess of \$100, and for any such expenditure in a lesser amount if the aggregate amount of such expenditures to the same person during the calendar year exceeds \$100.

Section 102.9(c) of Title 11, Code of Federal Regulations, requires that when a receipted bill is not available, the treasurer may keep the cancelled check showing payment of the bill; and the bill, invoice or other contemporaneous memorandum of the transaction. Section 102.9(e) requires the treasurer to use his or her best efforts to obtain the required information, and keep a complete record of the efforts to do so.

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These transfers were made for the purpose of paying
landmark bills, the transfers and the Committee's
committee is

The Committee itemized expenditures totaling \$3,790,995.26 during the period January 1, 1975 through June 30, 1978. The Treasurer failed to retain a receipted bill, invoice or contemporaneous memorandum for 64 expenditures totaling \$41,495.89. However, each was supported by a cancelled check.

On November 15, 1978, the Commission determined that the Treasurer was required to obtain the documentation and submit copies for review or present evidence of his efforts to do so for our review within 30 days of notification.

The Committee has obtained documentation in the form of receipted bills, and signed letters from the payee acknowledging receipt of the check (including a brief description of the purpose of the expenditure) for 14 expenditures totaling \$5,410.46. In addition, letters were sent requesting receipts for 35 expenditures totaling \$32,107.94. This leaves 15 expenditures totaling \$3,977.49 for which no evidence of efforts to obtain the required information has been submitted.

Recommendation

We recommend that the Committee response be considered best efforts, requiring no further action.

3. Transfers Between Presidential and Congressional Principal Campaign Committees

Part 110.3(a)(2)(v) of Title 11, Code of Federal Regulations states that transfers shall not be limited between principal campaign committees of a candidate seeking nomination or election to more than one Federal office, as long as the candidate did not receive funds under 26 U.S.C. 9006 or 9037, and the limitations on contributions by persons are not exceeded by the transfer. To assure this, the contributions making up the funds transferred shall be reviewed, beginning with the last received and working back until the amount transferred is reached.

Between November 18, 1976 and December 14, 1976, the Committee received transfers totaling \$23,000.00 from the Udall Election Committee, the principal campaign committee of the Candidate's congressional campaign.

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These transfers were made for the purpose of paying Committee debts. At the time of the transfers, the Congressional Committee neither provided nor did the Presidential Committee request the identity of the contributions making up the funds transferred.

On November 15, 1978, the Commission determined that the Committee was required to obtain from the Congressional Committee the identity of the contributors whose contributions made up the funds transferred. Further, if any contributor's limitation had been exceeded, when these contributions were added to the contributions already made to the transferee Principal Campaign Committee, the value of the excessive contributions be returned to the contributor.

The Committee has obtained the contributor information from the Congressional Committee, and identified 11 contributors who had exceeded their contribution limitations. The total value of their excessive contributions totaled \$2,225.00.

The Committee has submitted documentation indicating that refunds have been made to each contributor, but has not provided evidence of negotiation of the check for seven (7) of the refunds totaling \$1,775.00.

Recommendation

We recommend that the Committee refund to the Udall Election Committee, an amount equal to those refunds issued, and not cashed by the original contributor.

4. Disclosure of Contributor's Occupation and Principal Place of Business

Section 434(b)(2) of Title 2, United States Code, requires each report to disclose the full name and mailing address (occupation and principal place of business, if any) of each person who has made one or more contributions to or for such committee within the calendar year in an aggregate amount in excess of \$100, together with the amount and date of such contributions.

The Committee did not disclose the contributor's occupation as required for 355 of the 1,396 contributors tested for the period January 1, 1975 through December 31, 1977. This represents an approximate error rate of 25% for those contributors reviewed. In addition, the Committee did not disclose the contributor's principal place of business as required for 447, or 32% of the 1,396 items.

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In an attachment to the Committee's April 1976, monthly FEC report, the Committee stated that an effort was being made to obtain the necessary information and that when received, both the master file and FEC reports would be amended.

On May 4, 1977, the Committee responded by letter to a request from the Reports Analysis Division concerning the April 10, 1977 Quarterly report of Receipts and Expenditures noting that questionnaires had been included in the solicitations, and that in some cases, second requests had been sent. The Committee felt that they had used "best efforts" to obtain the required information.

On November 15, 1978, the Commission determined that the Committee was required to obtain the missing information and file an amended disclosure report or present evidence of their efforts to obtain the missing information within 30 days of notification.

In a response to our recommendations, the Committee reiterated its opinion that a "best efforts" attempt had been made to obtain the contributor information, and again stated that all solicitations contained a questionnaire requesting contributor occupation and principal place of business, and that letters had been sent by the Committee to obtain missing information. To support this, the Committee included copies of their solicitations, and copies of 22 letters (10 responses included) sent to contributors specifically asking for their occupation and principal place of business. Though the letter stated that the 22 letters composed only a sample of the letters sent, no information was included as to additional contributors receiving letters, or total number of letters sent. Also, the Committee stated that the Udall '76 contributor master list given to the Audit Division for matching fund purposes, was the most complete source of contributor information, and if necessary should represent the Committees disclosure report amendment.

Finally, the Committee stated that "in cases where the contributor information is incomplete, we (the committee) can only assume that the contributor did not wish to comply."

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In a test of the Udall '76 contributor list as an information source, the 355 contributors lacking the requisite contributor occupation information were traced to the master list. Additional information was found for only one (1) contributor traced.

Recommendation

In consideration of the result of a recent court case regarding similar information, we recommend no further action on this matter. 1/

5. Disclosure of Transfers-In

Section 434(b)(4) of Title 2, United States Code, requires each report to disclose the name and address of each political committee from which the reporting committee received any transfer of funds, together with the amounts and dates of all transfers.

Four (4) non-affiliated committees itemized transfers-out to the Committee in a total amount of \$7,190.00 between October 22, 1975 and May 3, 1976 (see Attachment A, Page 19). The Committee did not itemize these transfers-in on any FEC disclosure report filed.

On November 15, 1978, the Commission determined that the Committee was required to determine if these transfers had been received, and to amend their disclosure reports itemizing the transfers as required.

On March 5, 1979, the Committee submitted a letter stating that three (3) of the transfers-in totaling \$5,190.00 were received and reported, but not itemized as required. The fourth (4) transfer was received, but according to Committee officials returned uncashed due to limitation questions.

Recommendation

Since the Committee filed a letter on March 5, 1979 itemizing the transfers, we recommend that no further action be taken on this matter.

1/ FEC v. Citizens For Reagan et al
NO. 78-1150 (D.D.C. March 1, 1979)

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B. Apparent Unqualified Campaign Expenses

Section 9038(b)(2) of Title 26 of the United States Code provides that if the Commission determines that any amount of any payment made to a candidate from the matching payment account was used for any purpose other than: to defray the qualified campaign expenses with respect to which such payment was made; or to repay loans the proceeds of which were used, or otherwise to restore funds (other than contributions to defray qualified campaign expenses which were received and expended) which were used, to defray qualified campaign expenses it shall notify such candidate of the amount so used, and the candidate shall pay to the Secretary or his delegate an amount equal to such amount.

Section 9032(9)(A) of Title 26 of the United States Code defines a qualified campaign expense as a purchase, payment, distribution, loan, advance, deposit, or gift of money or of anything of value incurred by a candidate, or by his authorized committee, in connection with his campaign for nomination or election; and neither the incurring or payment of which constitutes a violation of any law of the United States or the state in which the expense is incurred or paid.

1. Traffic Fines

Our review of Committee expenditure records disclosed that the Wisconsin Udall '76 Committee made expenditures for traffic fines totaling \$418.00.

On March 5, 1979; the Committee submitted a check to the Audit Division made payable to the United States Treasury for \$418.00.

Recommendation

We recommend no further action.

2. Inadequately Supported Expenditures

Our review of the National and affiliated committee's expenditures show records which consist of cancelled checks, memoranda of their efforts to contact the vendor/payee to obtain particular descriptions of the goods or services rendered, payment vouchers, expense authorizations, reimbursement authorizations, statements of debt settlements, and vendor statements of account. Expenditures totaling \$163,614.50 were not supported by sufficient documentation to establish the expenditure's connection to the campaign.

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On November 15, 1978, the Commission determined that absent a showing to the contrary, these expenditures were unqualified campaign expenses and repayable to the United States Treasury. Subsequently, in December 1978, the Commission determined that payments to vendors would be considered adequately documented if supported by a cancelled check only, thereby reducing the amount of unsupported expenditures to \$76,824.46. The Committee then obtained and submitted documentation in the form of receipted bills and letters from payees for an additional \$15,082.59 in expenditures, leaving a balance of \$61,741.87 not supported by sufficient documentation to establish the expenditure's connection to the campaign.

A detailed listing of all insufficiently documented expenditures, displayed separately by Committee, is presented in Attachments 1 through 20 (Pages 41-88).

Recommendation

We recommend that the Commission determine that expenditures totaling \$61,741.87 are unqualified campaign expenses requiring an equal amount to be repaid to the United States Treasury.

3. Allocation of State Expenditures

Section 441a(b)(1) of Title 2 of the United States Code provides that "no candidate for the Office of President of the United States who is eligible under Section 9003 of the Internal Revenue Code of 1954 (relating to condition for eligibility for payments) or under 9033 of the Internal Revenue Code of 1954 (relating to eligibility for payments) to receive payments from the Secretary of the Treasury may make expenditures in excess of -

(A) \$10,000,000, in the case of a campaign for nomination for election to such office except the aggregate of expenditures under this subparagraph in any one state shall not exceed the greater of 16 cents multiplied by the voting age population of the State or \$200,000..."

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The expenditure limitation established for the State of New Hampshire for the 1976 Primary election was \$218,200.00. The Committee reported expenditures allocated to the State of New Hampshire in the amount of \$54,070.58 for the period January 1, 1975 through June 30, 1978. The New Hampshire Udall '76 Committee, an authorized Committee of the Candidate, reported expenditures of \$158,128.60 in the State of New Hampshire. Thus, the consolidated, reported total expenditures of the Committee and its State affiliates in New Hampshire equals \$212,199.18. This amount was reflected on the Committee's FEC Schedule 3c, (Allocation of Primary Expenditures by State For a Presidential Candidate).

During the course of our audit we determined that the following Committee expenditures should have been allocated to the State of New Hampshire:

- A. American Express Charges \$ 3,647.89
(see Attachment B, Page 20).
- B. Concord Bank Expenditures 5,265.39
for the period 3/5/75-
6/30/75 (net of fundraising).
- C. New Hampshire Committee 6,665.40
itemized fundraising
expenditures between
January 28, 1976 and
February 24, 1976.
- D. Major Print Production 1,705.04
produced specifically 2,457.80
for the New Hampshire
election.
- E. Weston Associates (see 3,800.00
Attachment B, Pages 21-23). 1,000.00
- F. Massachusetts
Advertising Expenditures
 - 1. Massachusetts TV 5,356.28
Allocated to New
Hampshire

8 2 0 4 0 3 2 3 9 9 8

2. Massachusetts Radio 1,577.90

Allocated to New
Hampshire

Additional expenditures \$31,475.70

to be allocated to New Hampshire

Therefore, it appeared the Committee and its affiliates actually spent \$243,674.88 allocable to the State of New Hampshire, an amount which exceeds the State expenditure limitation by \$25,474.88.

On November 15, 1978, the Commission determined that absent a showing to the contrary, the amounts expended in excess of the limitation, were unqualified campaign expenses requiring an equal amount to be repaid to the United States Treasury.

The Committee submitted a letter responding to this preliminary determination as follows:

Items A, B, and C above. The Committee does not contest these determinations.

D. Major Print Production produced specifically for New Hampshire election.

The Committee stated that the material was not of satisfactory quality and was not used. (See Exhibit B, page 142). As evidence of this, the Committee submitted a letter from the New Hampshire treasurer stating that the brochures were not used, and were disposed of after the campaign. No additional evidence was submitted to support this contention. The Audit staff recommends that the Commission determine that this explanation is not sufficient to demonstrate that these expenditures should not be charged to the New Hampshire limitation.

E. Weston Associates (see Attachment B).

The Committee states that 50% of this amount should be considered fundraising. Again, no evidence such as copies of the materials purchased were submitted for review (see Exhibit B, page 142).

The Audit staff recommends that the Commission determine that this explanation is not sufficient to demonstrate that these expenditures should not be charged to the New Hampshire limitation.

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F. Massachusetts Advertising Expenditures

(1) Massachusetts TV Allocated to New Hampshire

The Committee states that the expenditures for television in the Boston area should be allocated to Maine, Vermont, New Hampshire, Connecticut, Rhode Island, and Massachusetts based on voting age population (see Exhibit B, page 142). However, with the exception of Vermont where the Candidate did not appear on the primary election ballot and Massachusetts where the majority of the expenditures have been allocated, the primary election or state convention in these states occurred approximately three to four months after the advertising was aired.

In addition, the staff allocations are based on broadcast area, and station dominant influence statistics published for the Boston area television market.

Therefore, the Audit staff recommends that the Commission reject the Committee's calculation based on voting age population.

(2) Massachusetts Radio Allocated to New Hampshire

The Committee submitted invoices totaling \$6,196.01 for radio time purchases made by New Hampshire, from stations located in Maine, Vermont, and Massachusetts. In addition, the Committee contends that if Massachusetts radio purchases are to be allocated to New Hampshire, a portion of New Hampshire radio purchases should then also be allocated to Massachusetts. *

As noted before, the Audit staff rejected the allocation of radio time purchased by New Hampshire to Maine and Vermont, due to the Candidate's absence on the Vermont ballot, the date of the Maine convention, and due to the cessation of broadcasting on the New Hampshire primary date. However, after discussion with the Office of General Counsel, it was decided that since radio time had been purchased by both the New Hampshire and Massachusetts committees, that radio purchases should be applied to the limitation of the purchasing state. Therefore, the Audit staff recommends that the Commission reject the allocation of New Hampshire radio purchases to Massachusetts, and delete the previous allocation of \$1,577.90 in Massachusetts radio time to New Hampshire.

* This argument does not apply to Television purchases, since New Hampshire television was purchased solely in the Boston market.

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In addition, the Committee submitted recalculations affecting its own expenditures to be allocated to the State of New Hampshire, and reported expenditures of the New Hampshire Udall '76 Committee. The recalculations were as follows:

Allocable Salaries

The Committee allocated \$35,803.96 in salary payments to workers in New Hampshire. The Committee contends that no allowance was made for time spent in fundraising, or exempt legal and accounting activities. Therefore, the Committee has reduced the allocated salary payment by \$8,690.69 to \$27,113.27. The Committee did not document how an individuals time spent in these activities was determined.

The Audit staff determined that the individuals involved held positions such as Administrative Director, Chairperson, New Hampshire Coordinator, etc., therefore, it is reasonable to assume that these individuals would be involved in fundraising, legal and accounting activities. The Audit staff therefore recommends that the Commission determine that the Committee's salary recalculation be accepted.

Out of State Expenditures

The Committee submitted documentation for expenditures paid for by the New Hampshire Udall '76 Committee which the Committee contends were activities conducted outside of New Hampshire, or are exempt from allocation.

The documentation totaled \$7,684.86, and consisted mainly of long distance telephone calls made from New Hampshire to out of state locations. No phone logs were submitted by the Committee to support the reallocation.

Due to lack of adequate documentation, the Audit staff determined that long distance calls made prior to February 24, 1976, the date of the New Hampshire primary, and calls made after the primary to New York and Washington, D.C., locations of Committee headquarters, should not be accepted as non-New Hampshire related. Therefore, after review of the documentation, the Audit staff recommends the acceptance of \$2,812.47 as New Hampshire expenditures allocable to other states.

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The Audit staff recommends that the Commission reject the Committee reallocation of \$4,872.39 in reported New Hampshire expenditures, as expenditures allocable to other states.

Summary of Expenditures Subject to New Hampshire Limitation

Amounts Allocated by Committee at the time of the audit	\$212,199.18
Less allocation of salaries to Legal, Accounting, and Fundraising Costs	(8,690.69)
Less Expenditures paid from New Hampshire Account Allocable to Other States	(2,812.47)
Plus Amounts Contained in Items A-F above	31,475.70
Less Massachusetts Radio Previously Allocated to New Hampshire	<u>(1,577.90)</u>
Total Expenditures Allocable to the 1976 New Hampshire Primary Election	\$230,593.82
Less Limitation Established for the 1976 New Hampshire Primary Election	<u>(218,200.00)</u>
Expenditures in Excess of Limitation	<u>\$ 12,393.82</u>

Recommendation

The Audit staff recommends that expenditures totaling \$12,393.82 be considered unqualified campaign expenses and repayable to the United States Treasury.

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C. Repayment

1. Surplus Matching Fund Payment

Section 134.3(c)(2) of Title 11, Code of Federal Regulations, provides that if, on the last day of candidate eligibility there are net outstanding campaign obligations, any matching funds received thereafter may be retained for a period not exceeding 6 months after the end of the matching payment period in order to liquidate those obligations. However, as of the date when the amount or amounts of matching funds received after ineligibility equal(s) the amount of the candidate's net outstanding campaign obligations, the candidate shall be obliged to repay to the Treasury that portion of any unexpended balance remaining on that date in the candidate's accounts (less the matching payments so received), which bears the same ratio to such balance as the total amount bears to the aggregate of all contributions and matching funds deposited in all the depositories through that date.

The Commission preliminarily determined June 14, 1976; to be the day on which the Honorable Morris K. Udall's candidacy terminated for the purpose of incurring qualified campaign expenses. The Candidate was so informed by letter. On June 28, 1976, the Candidate sent a letter to the Commission which enclosed a statement attesting to the Committee's net outstanding campaign obligations as of June 14 but also stating that this submission was "not a recognition that (his) campaign is inactive for purposes of making qualified campaign expenditures under Chapter 96 of Title 26."

The statement submitted by the Candidate showed net outstanding obligations totaling \$662,700 on June 14, 1976. The amount of matching payments certified after that date equaled \$457,793.11. The Candidate has never disputed the application of June 14, 1976, as his date of ineligibility for purposes of calculating net outstanding campaign obligations.

Recommendation

Since the amount of matching payments received after the date of ineligibility never equaled the Committee's net outstanding campaign obligations on the date of ineligibility, no repayment of surplus matching funds is required.

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2. Unmatchable Contributions

Section 9038(b)(1) of Title 26 of the United States Code provides that if the Commission determines that any portion of the payments made to a candidate from the matching payment account was in excess of the aggregate amount of payments to which such candidate was entitled under Section 9034, it shall notify the candidate, and the candidate shall pay to the Secretary or his delegate an amount equal to the amount of the excess payments.

The Committee submitted a series of contributions totaling \$850.00 for matching and listed them as contributions from a single contributor. The Committee received \$250.00 in public funds for these contributions. During the audit, we found that only \$25.00 of the \$850.00 was in fact a contribution from the identified individual. The residual \$825.00 was from numerous individuals in amounts equal to or less than \$100 collected by that individual. The individual who collected the contributions transmitted the funds by check.

The individual provided the Committee a detailed accounting of the transmitted contributions, but the Committee mistakenly attributed the contributions received to the signatory of the contribution checks.

On March 5, 1979, the Committee submitted a check to the Audit Division made payable to the United States Treasury for \$225.00.

Recommendation

We recommend no further action.

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Unmatured Contributions .5

Repayment Summary

B. 1. Traffic Violation Fines (see Page 9). \$ 418.00

B. 2. Insufficiently Documented Expenditures:
National and Affiliated Committees 61,741.87
(see Page 9).

B. 3. Expenditures in Excess of the Limitation 12,393.82
(see Page 10).

C. 2. Contribution Matched in Excess of Eligibility (see Page 17). 225.00

Total Recommended Repayment \$74,778.69

Less Payments:

B. 1. Traffic Violations (418.00)

C. 2. Contribution Matched in Excess of Eligibility (225.00)

Additional Repayments Required \$74,135.69

IV. Auditor's Statement

Except for the matters specifically noted in this report, and the attached appendices, the audit disclosed that the Committees conducted their activities in conformity with the Federal Election Campaign Act of 1971, as amended, and in conformity with Chapter 96 of Title 26, U.S.C., in all material aspects.

32040324005

ATTACHMENT B

TERMINATION OF AMERICAN EXPRESS CHARGES

ATTACHMENT A

DATE RECEIVED NUMBER VENDOR

SUMMARY OF TRANSFERS REPORTED TO THE UDALL '76 COMMITTEE OR AFFILIATED COMMITTEE

<u>Reporting Committee</u>	<u>Date</u>	<u>Amount</u>
CWA District 2 PAC	5/3/76	2,000.00**
NLI Testimonial Dinner Committee	10/22/75	150.00
People for Improvement of Education	12/5/75	40.00
* UAW Voluntary Community Action Program	3/29/76	5,000.00

* UAW V CAP records contain a cancelled check for this contribution which was deposited into the Udall '76 Fund Raising account number 020-249-5 in the American Indian National Bank on March 31, 1976.

** Returned uncashed.

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ATTACHMENT B

ITEMIZATION OF AMERICAN EXPRESS CHARGES

A TWEEDDATA

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<u>VENDORS</u>	<u>AMOUNT</u>	<u>DATE INCURRED</u>
The New Berkshire Nashua, NH	\$ 233.01	2/13/76
Page Airways Albany, NY (Manchester Charter)	800.00	2/1/76
Ramada Inn Dover, NH	.65.22	2/6/76
Ramada Inn Dover, NH	107.32	2/9/76
Grenier Aviation, Inc. Manchester, NH	732.50	2/12/76
Riverdale Inn Petersborough, NH	133.52	Before 2/26/76
Howard Johnson Nashua, NH	24.50	Before 2/26/76
Town & Country Motor Inn Gorham, NH	289.28	11/15/75
Dunfey Family Corp. Manchester, NH	243.33	11/18/75
Ramada Inn Dover, NH	92.52	11/24/75
Dunfey Manchester, NH	267.78	11/25/75
Jon Wyfred Bedford, NH	254.71	11/21/75
New Berkshire Nashua, NH	123.01	12/12/75
Town & Country Gorham, NH	186.25	11/18/75
Ramada Inn Laconia, NH	44.10	11/11/75
Daffodils Bedford, NH	50.84	2/23/76

Total American Express Charges \$3,647.99
to be Allocated to New Hampshire

NOV 19 1975

ATTACHMENT B

-22-

Udall '76 Committee
230 Seventh Street S.E.
Washington, D.C. 20003

ATTACHMENT B

November 13, 1975

UDALL '76 COMMITTEE

PLEASE DETACH AND RETURN THIS STUB WITH YOUR RECEIPTS

Payments on account of Weston Associates, Inc., to be allocated to New Hampshire.

Weston Associates, Inc., bill for production and distribution of tabloid (see Attachment B, Page 17). **\$13,692.00**

Payments by the New Hampshire Udall '76 Committee

<u>Date</u>	<u>Amount</u>
11/18/75	\$ 843.00
11/18/75	1,157.00
11/18/75	7,000.00
11/25/75	<u>892.00</u>

Less: Total Payments by New Hampshire Committee **(9,892.00)**

Payment by the Udall '76 Committee for tabloids produced and distributed by Weston Associates, Inc. **\$ 3,800.00**

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NOV 17 1975

Udall '76 Committee
 530 Seventh Street S. E.
 Washington, D. C. 20003

November 13, 1975

PLEASE DETACH AND RETURN THIS STUB WITH YOUR REMITTANCE

\$ _____

DATE	ORDER NO.	DESCRIPTION	CHARGE	CREDIT	BALANCE
- BALANCE FORWARD					
10/20/75	36694	Manchester Union Leader	2,453.00		
10/20/75	36695	Concord Monitor	900.00		
10/20/75	36696	Nashua Telegraph	1,245.00		
10/20/75	36697	Laconia Citizen	247.00		
10/20/75	36698	Claremont Eagle/Times	475.00		
10/20/75	36699	Foster's Daily Democrat	891.00		
10/20/75	36700	Keene Sentinel	546.00		
10/20/75	36701	Valley News	353.00		
10/20/75	36702	Portsmouth Herald	1,006.00		
10/20/75	36704	Berlin Reporter	395.00		
10/20/75	36705	Salem Observer	181.00		
10/20/75		Production on 250M 8 tabloids @ \$20.00 per M	5,000.00		13,692.00

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2,453.00
 900.00
 1,245.00
 247.00
 475.00
 891.00
 546.00
 353.00
 1,006.00
 395.00
 181.00
 5,000.00
 13,692.00

TERMS PAYABLE NET 10-DAYS
 1% PER MONTH INTEREST ON UNPAID BALANCE AFTER 60 DAYS (12% PER ANNUM)
 PLEASE EXAMINE THIS INVOICE CAREFULLY CONNECTIONS MUST BE MADE WITHIN 15 DAYS

ATTACHMENT B

UDALL '76 COMMITTEE

A xibneqg

Client's Ledger
Weston Associates, Inc.

<u>Date</u>	<u>Description</u>	<u>Amount</u>	<u>Balance</u>
2/75	Letterheads, envelopes, new release stationery for New Hampshire use	\$ 176.37	\$ 176.37
4/75	New Hampshire Time Survey flier	155.45	331.82
	News Letter Format	67.14	398.96
	Letterheads and envelopes	355.05	754.01
5/8/75	Photographs	89.85	843.86
5/8/75	News Releases	617.65	1,461.51
6/9/75	National Payment on Account	(1,000.00)	<u>461.51</u>
	Balance on 6/9/75		<u>\$ 461.51</u>

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STANDARD ST. LEAD

Appendix A

UDALL '76 COMMITTEE - ARIZONA

Findings and Conclusions

A. Matters noted during the audit of the Udall '76 Committee - Arizona were referred to the Office of General Counsel on June 7, 1979.

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Appendix B

UDALL '76 CALIFORNIA COMMITTEE

Appendix B

UDALL '76 CALIFORNIA COMMITTEE

Findings and Conclusions

Pursuant to Commission directive, the Committee forwarded its records to New York where we conducted our examination. Consequently, committee officials were not available for comment during or at the conclusion of our examination.

A. Matters noted during the audit of the Udall '76 California Committee were referred to the Office of General Counsel on June 7, 1979.

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Appendix C

ILLINOIS UDALL '76 COMMITTEE

Findings and Conclusions

A. No Records Presented for Audit

Section 104.12(b) of Title 11, Code of Federal Regulations requires, in part, each candidate, political committee, or other person required to file any report or statement under this subchapter to maintain records with respect to the matters to be reported which shall provide in sufficient detail the necessary information and data from which the filed reports and statements may be verified, clarified and checked for accuracy and completeness.

The entire filing history of the Committee consisted of FEC Forms 3a, for the first and second quarters of 1976, and two letters. In one letter, the Treasurer stated that the Committee collected \$1,100 in receipts and made approximately \$450 in expenditures. The other letter indicates that the Committee has terminated. There were no residual funds and all funds not spent directly by the Committee were forwarded to the National Committee. The National Committee reported transfers to the Committee totaling \$750.00 during March, 1976.

The Audit staff and the Udall '76 National Committee made several unsuccessful attempts to contact the Treasurer. As a result, we were unable to obtain the necessary records with which to verify reports and statements filed by the Committee.

On November 15, 1978, the Commission determined that the National Committee was required to obtain and submit for our review the necessary records to verify the Committee's reports of receipts and expenditures within 30 days of receipt of notification.

To date, the National Committee has been unable to contact the Illinois Udall '76 Treasurer.

Recommendation

Since the National Committee has been unsuccessful in its attempts to contact the Committee Treasurer, and since the \$750.00 transfer to the Committee has been included as a Title 26 unsupported expenditure, the Audit staff recommends that no further Committee action be required.

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Appendix D

UDALL MARYLAND CAMPAIGN

Findings and Conclusions

A. Contributions Made in Excess of Limitations

Section 441a(a)(1)(A) of Title 2, United States Code, prohibits a person from making contributions to any candidate and his authorized political committee with respect to any election for Federal office which, in the aggregate, exceed \$1,000. Section 441a(f) of Title 2, United States Code, states, in part, that no political committee shall knowingly accept any contribution in violation of the provisions of this section.

The Committee received contributions from a contributor totaling \$1,050.00. This total consisted of two (2) loans received on May 10 and May 12, 1976 totaling \$850.00 and other contributions of \$200.00. The loans remained outstanding until repaid on December 17, 1976. Contributions totaling \$600.00 had been made by the contributor to the National Committee prior to the existence of the Committee. These contributions were not aggregated by either the National Committee or the Maryland Udall Campaign.

Recommendation

Since the Committee has repaid the loan, we recommend no further action in this matter.

B. Other matters noted during the audit of the Udall Maryland Campaign were referred to the Office of General Counsel on June 7, 1979.

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Appendix E

Appendix E

MASSACHUSETTS UDALL '76 COMMITTEE

Findings and Conclusions

A. Matters noted during the audit of the Massachusetts Udall '76 Committee were referred to the Office of General Counsel on June 7, 1979.

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Appendix F

UDALL '76 MASSACHUSETTS SPECIAL EVENTS COMMITTEE

Findings and Conclusions

Pursuant to Commission directive, the Committee forwarded its records to New York where we conducted our examination. Consequently, Committee officials were not available for comment during or at the completion of our examination.

A. Matters noted during the audit of the Udall '76 Massachusetts Special Events Committee were referred to the Office of General Counsel on June 7, 1979.

82040324016

Appendix G

MICHIGAN UDALL FOR PRESIDENT COMMITTEE

Findings and Conclusions

Pursuant to Commission directive, the Committee forwarded its records to New York where we conducted our examination. Consequently, Committee officials were not available for comment during or at the completion of our examination.

A. Matters noted during the audit of the Michigan Udall For President Committee were referred to the Office of General Counsel on June 7, 1979.

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Appendix I

NEW HAMPSHIRE UDALL '76 COMMITTEE

Findings and Conclusions

Appendix H

UDALL '76 - MISSOURI

Findings and Conclusions

Pursuant to Commission directive, the Committee forwarded its records to New York where we conducted our examination. Consequently, Committee officials were not available for comment during or at the completion of our examination.

A. Matters noted during the audit of the Udall '76 - Missouri Committee were referred to the Office of General Counsel on June 7, 1979.

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Appendix I

NEW HAMPSHIRE UDALL '76 COMMITTEE

Findings and Conclusions

A. Supporting Documentation for Expenditures

Section 432(d) of Title 2, United States Code, requires the treasurer to obtain and keep a receipted bill, stating the particulars, for every expenditure made by or on behalf of a political committee in excess of \$100 in amount and for any such expenditure in a lesser amount, if the aggregate amount to the same person during a calendar year exceeds \$100. Section 102.9(c)(4) and (e) of Title 11, Code of Federal Regulations provides that when a receipted bill is not available, the treasurer may keep a cancelled check, showing payment of the bill; and the bill, invoice or other contemporaneous memorandum of the transaction or use his or her best efforts to obtain the required information, and keep a complete record of the efforts to do so.

The Committee made 253 expenditures totaling \$161,870.89 which require supporting documentation. The Treasurer did not retain a receipted bill, invoice, or contemporaneous memorandum for 20 of those expenditures requiring documentation. These 20 expenditures total \$11,989.48. Each expenditure was supported by a cancelled check.

On November 15, 1978, the Commission determined that the Treasurer was required to obtain the required documentation and submit copies for our review or present evidence of her efforts to do so within 30 days of notification.

The Committee submitted receipted bills, and letters signed by payees acknowledging receipt of the checks for 17 expenditures totaling \$11,062.48. In addition, the Committee sent letters requesting documentation for the three (3) remaining expenditures totaling \$927.00.

Recommendation

We recommend that due to the Committee's efforts to comply with the Commission's recommendations, that no further action be required.

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Page 1 of 1

Appendix J

Appendix J

NEW JERSEY UDALL '76 COMMITTEE

Findings and Conclusions

A. Matters noted during the audit of the New Jersey Udall '76 Committee were referred to the Office of General Counsel on June 7, 1979.

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Appendix K

NEW MEXICO UDALL '76 COMMITTEE

Findings and Conclusions

Pursuant to Commission directive, the Committee forwarded its records to Washington, D.C. where we conducted our examination. Consequently, Committee officials were not available for comment during or at the completion of our examination.

A. Failure to File

Section 434(a)(3) of Title 2 of the United States Code, and the "Notice to Presidential Candidate Committees of January 19, 1976", requires presidential candidates and their authorized committees to file monthly reports in an election year. In addition, Section 104.1(c)(3)(ii) of Title 11, Code of Federal Regulations, requires that a political committee shall continue to file required reports until terminated.

The Committee registered with the Commission on March 10, 1976, and filed reports through April 30, 1976. The Treasurer failed to file reports for the period May 1, 1976 through December 6, 1977. During that period, the Committee collected \$3,443.54 in receipts and made expenditures totaling \$3,327.18. According to the Treasurer, the reports were not filed because of personal problems unrelated to Committee activity. At the request of the Audit Division, on December 9, 1977, the Committee filed reports for the above period.

Recommendation

Although the FEC disclosure reports were not filed on a timely basis, the reports have been received and placed on public record. Therefore, we recommend that no further action be taken in this matter.

B. Other matters noted during the audit of the New Mexico Udall '76 Committee were referred to the Office of General Counsel on June 7, 1979.

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Appendix L

NEW YORK UDALL '76 COMMITTEE

Findings and Conclusions

A. Matters noted during the audit of the New York Udall '76 Committee were referred to the Office of General Counsel on June 7, 1979.

B. Other Matters

The following is an item noted during the course of the audit, for which no Committee action is required:

1) During the period March 20, 1976 through April 9, 1976, an individual made contributions totaling \$213.00. On March 18, the same contributor loaned the Committee \$900.00 which was not repaid until April 22, 1976. Therefore, for the period March 31, 1976 through April 22, 1976, the contributor exceeded the contribution limit established by Section 441a(a)(1)(A) of Title 2, United States Code.

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Appendix M

UDALL '76 COMMITTEE - OHIO

Findings and Conclusions

Pursuant to Commission directive, the Committee forwarded its records to New York where we conducted our examination. Consequently, Committee officials were not available for comment during or at the completion of our examination.

A. Matters noted during the audit of the Udall '76 Committee - Ohio were referred to the Office of General Counsel on June 7, 1979.

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Appendix N

OREGON UDALL '76 COMMITTEE

Findings and Conclusions

A. Contribution Limitations

Section 441a(a)(1)(A) of Title 2, United States Code, provides, in part, that no person shall make contributions to any candidate and his authorized political committees with respect to any election for Federal office which in the aggregate exceed \$1,000.00.

The Committee received a contribution of \$250.00 on December 4, 1975, and a loan of \$1,000.00 from the same person on March 26, 1976. The debt of \$1,000.00 was subsequently transferred to the National Committee. Upon learning that the above contributor had exceeded his contribution limitation by \$250.00, the Treasurer notified the National Committee. The National Committee repaid half of the loan (\$500.00) on October 19, 1976, thereby bringing the total amount of contributions received from the contributor down to \$750.00. Although the Committee has taken action to return the excess contribution, the contributor had exceeded his limitation by \$250.00 for a period of seven (7) months.

Recommendation

Since the Committee has returned the excess contribution, we recommend no action be taken in this matter.

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Appendix O

Appendix O

PENNSYLVANIA UDALL '76 COMMITTEE

Findings and Conclusions

Pursuant to Commission directive, the Committee forwarded its records to New York where we conducted our examination. Consequently, Committee officials were not available for comment during or at the completion of our examination.

A. Matters noted during the audit of the Pennsylvania Udall '76 Committee were referred to the Office of General Counsel on June 7, 1979.

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Appendix P

WASHINGTON CITIZENS FOR UDALL '76

Findings and Conclusions

Pursuant to Commission directive, the Committee forwarded its records to New York where we conducted our examination. Consequently, Committee officials were not available for comment during or at completion of our examination.

A. Matters noted during the audit of the Washington Citizens for Udall '76 Committee were referred to the Office of General Counsel on June 7, 1979.

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Appendix Q

WISCONSIN UDALL '76 COMMITTEE

Findings and Conclusions

Pursuant to Commission directive, the Committee forwarded its records to Washington, D.C. where we conducted our examination. Consequently, Committee officials were not available for comment during or at the completion of our examination.

A. Matters noted during the audit of the Wisconsin Udall '76 Committee were referred to the Office of General Counsel on June 7, 1979.

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Udall '76 Committee

Attachment 1 Page 1 of 1

Schedule of Unsupported Expenditures as of 5/4/79
Udall '76 California Committee

Payee's Function	Date	Amount of Check	Unsupported		Supported	
			Amount Unsupported as of 5/4/79	Type of * Documents	Intended Purpose per Documents Provided For FEC Inspection	Amount Supported
<u>Southern California</u>						
Field	4/23/76	\$105.00	\$105.00	1 + 5	Precinct Maps	
Field	5/28/79	\$109.39	\$109.39	1	Reimbursed Printing Expenses	
Person Consultant	6/8/76	\$128.00	\$128.00	1	Reimbursed Travel Expenses	

- Type of Documentation:
- (1) Cancelled check (Committee account to payee) and Committee generated memorandum.
 - (2) Cancelled Committee check only.
 - (3) Memorandum from payee without cancelled check to the ultimate vendor/payee, or other ultimate vendor/payee documentation.
 - (4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.
 - (5) Committee effort - letter sent to payee.

Schedule of Unsupported Expenditures as of 5/4/79
Udall '76 California Committee

Payee's Function	Date	Amount of Check	Amount Unsupported as of 5/4/79	<u>Unsupported</u>		<u>Supported</u>	
				Type of * Documents	Intended Purpose per Documents Provided For FEC Inspection	Amount Supported	Type of * Documents
<u>Southern California (continued)</u>							
Field Person	5/13/76	\$266.81	\$266.81	1 + 5	Reimbursed Expenses		
Field Person	6/1/76	\$220.00	\$220.00	1	Operating Expenses		
	6/8/76	\$110.00	\$110.00	1			
Field Person	6/3/76	\$211.07	\$211.07	1	Radio Spots		

- Type of Documentation: (1) Cancelled check (Committee account to payee) and Committee generated memorandum.
- (2) Cancelled Committee check only.
- (3) Memorandum from payee without cancelled check to the ultimate vendor/payee, or other ultimate vendor/payee documentation.
- (4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.
- (5) Committee effort - letter sent to payee.

Udall '76 Committee

Attachment 1 Page 3 of 3

043

Schedule of Unsupported Expenditures as of 5/4/79
Udall '76 California Committee

Payee's Function	Date	Amount of Check	Amount Unsupported as of 5/4/79	Unsupported		Supported	
				Type of *	Intended Purpose per Documents Provided For FEC Inspection	Amount Supported	Type of *
<u>Los Angeles</u>							
Field Person	12/2/75	\$250.00	\$ 250.00	1 + 5	Fundraising Work		
<u>Northern California</u>							
Field Person	6/24/76	\$134.28	\$ 134.28	1	Reimbursed Expenses		
Field Person	6/30/76	\$180.00	\$ 180.00	1	Reimbursed for Ad in Daily California		
Total			<u>\$1,714.55</u>				

- Type of Documentation: (1) Cancelled check (Committee account to payee) and Committee generated memorandum.
- (2) Cancelled Committee check only.
- (3) Memorandum from payee without cancelled check to the ultimate vendor/payee, or other ultimate vendor/payee documentation.
- (4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.
- (5) Committee effort - letter sent to payee.

Attachment 2

Udall '76 Committee

Attachment 2 Page 1 of 1

Schedule of Unsupported Expenditures as of 5/4/79
Connecticut Udall '76 Committee

Payee's Function	Date	Amount of Check	Amount Unsupported as of 5/4/79	<u>Unsupported</u>		<u>Supported</u>	
				Type of * Documents	Intended Purpose per Documents Provided For FEC Inspection	Amount Supported	Type of * Documents
Field	4/30/76	\$200.00	\$200.00	1	Press Bus		
Total			\$200.00				

- Type of Documentation:
- (1) Cancelled check (Committee account to payee) and Committee generated memorandum.
 - (2) Cancelled Committee check only.
 - (3) Memorandum from payee without cancelled check to the ultimate vendor/payee, or other ultimate vendor/payee documentation.
 - (4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.
 - (5) Committee effort - letter sent to payee.

Udall '76 Committee

Attachment 3 Page 1 of 1

Schedule of Unsupported Expenditures as of 5/4/79
D.C. Committee for Udall

Payee's Function	Date	Amount of Check	Unsupported		Supported	
			Amount Unsupported as of 5/4/79	Type of * Documents	Intended Purpose per Documents Provided For FEC Inspection	Amount Supported
Field Person	7/24/76	\$120.00	\$120.00	1 + 7	Convention Expenses	
Total			<u>\$120.00</u>			

- Type of Documentation:
- (1) Cancelled check (Committee account to payee) and Committee generated memorandum.
 - (2) Cancelled Committee check only.
 - (3) Memorandum from payee without cancelled check to the ultimate vendor/payee, or other ultimate vendor/payee documentation.
 - (4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.
 - (5) Committee effort - letter sent to payee.
 - (7) Response received from payee - response inadequate.

Udall '76 Committee

Attachment 4 Page 1 of 1

Schedule of Unsupported Expenditures as of 5/4/79
Iowa Udall '76 Committee

Payee's Function	Date	Amount of Check	Amount Unsupported as of 5/4/79	Unsupported		Supported	
				Type of * Documents	Intended Purpose per Documents Provided For FEC Inspection	Amount Supported	Type of * Documents
Advance Person	12/30/75	\$200.00	\$200.00	1 + 7	Advance Expenses		
Wisconsin Coordinator	1/11/76	\$400.00	\$400.00	1 + 7	Expenses		
Total			<u>\$600.00</u>				

- Type of Documentation: (1) Cancelled check (Committee account to payee) and Committee generated memorandum.
- (2) Cancelled Committee check only.
- (3) Memorandum from payee without cancelled check to the ultimate vendor/payee, or other ultimate vendor/payee documentation.
- (4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.
- (5) Committee effort - letter sent to payee.
- (7) Response received from payee - response inadequate.

Udall '76 Committee

Attachment 5 Page 1 of 1

Schedule of Unsupported Expenditures as of 5/4/79
Kentucky Udall '76 Committee

Payee's Function	Date	Amount of Check	Unsupported		Supported	
			Amount Unsupported as of 5/4/79	Type of * Documents	Intended Purpose per Documents Provided For FEC Inspection	Amount Supported
Field Person	5/24/76	\$254.37	\$254.37	1 + 5	Reimbursed Expenses	
Total			\$254.37			

- Type of Documentation:
- (1) Cancelled check (Committee account to payee) and Committee generated memorandum.
 - (2) Cancelled Committee check only.
 - (3) Memorandum from payee without cancelled check to the ultimate vendor/payee, or other ultimate vendor/payee documentation.
 - (4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.
 - (5) Committee effort - letter sent to payee.

Schedule of Unsupported Expenditures as of 5/4/79
Udall Maryland Campaign

Payee's Function	Date	Amount of Check	Amount Unsupported as of 5/4/79	Unsupported		Supported	
				Type of * Documents	Intended Purpose per Documents Provided For FEC Inspection	Amount Supported	Type of * Documents
Field Person	5/15/76	\$136.04	\$136.04	1	Stationery		
	4/26/76	\$200.00	\$200.00	1	Hall Rent		
Field Person	5/15/76	\$237.00	\$237.00	1	Office Supplies		
	4/26/76	\$100.62	\$100.62	1	Travel		
	4/21/76	\$100.00	\$100.00	1	Hall Rent		
Field Person	4/5/76	\$119.25	\$119.25	1	Envelopes and Stamps		

- Type of Documentation:
- (1) Cancelled check (Committee account to payee) and Committee generated memorandum.
 - (2) Cancelled Committee check only.
 - (3) Memorandum from payee without cancelled check to the ultimate vendor/payee, or other ultimate vendor/payee documentation.
 - (4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.
 - (5) Committee effort - letter sent to payee.

Udall '76 Committee

Attachment 6 Page 2 of 2

Schedule of Unsupported Expenditures as of 5/4/79
Udall Maryland Campaign

Payee's Function	Date	Amount of Check	Unsupported		Supported	
			Amount Unsupported as of 5/4/79	Type of * Documents	Intended Purpose per Documents Provided For FEC Inspection	Amount Supported
Field Person	4/20/76	\$200.00	\$ 200.00	1	Rent	
Field Person	4/20/76	\$150.00	\$ 150.00	1	Rent	
	4/20/76	\$100.00	\$ 100.00	1	Rent	
Total			<u>\$1,342.91</u>			

- Type of Documentation:
- (1) Cancelled check (Committee account to payee) and Committee generated memorandum.
 - (2) Cancelled Committee check only.
 - (3) Memorandum from payee without cancelled check to the ultimate vendor/payee, or other ultimate vendor/payee documentation.
 - (4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.
 - (5) Committee effort - letter sent to payee.

Udall '76 Committee

Schedule of Unsupported Expenditures as of 5/4/79
Massachusetts Udall '76 Committee

Payee's Function	Date	Amount of Check	Amount Unsupported as of 5/4/79	Type of * Documents	Intended Purpose per Documents Provided For FEC Inspection	Supported	
						Amount Supported	Type of * Documents
Field Person	2/21/76	\$112.00	\$112.00	1	Travel and Food Advance		
	3/2/76	\$150.00	\$150.00	1	Travel and Food Advance		
Field Person	12/16/75	\$100.00	\$100.00	1	Campaign Expenses		
	2/20/76	\$100.00	\$100.00	1 + 5	Reimbursed Expenses		
Field Person	12/22/75	\$100.00	\$100.00	1	Reimbursed Expenses		
	1/28/76	\$115.00	\$115.00	1	Greyhound		
Field Person	1/30/76	\$100.00	\$100.00	1	Field Expenses		
	3/3/76	\$250.00	\$250.00	1	Field Expenses		

- Type of Documentation:
- (1) Cancelled check (Committee account to payee) and Committee generated memorandum.
 - (2) Cancelled Committee check only.
 - (3) Memorandum from payee without cancelled check to the ultimate vendor/payee, or other ultimate vendor/payee documentation.
 - (4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.
 - (5) Committee effort - letter sent to payee.

Schedule of Unsupported Expenditures as of 5/4/79
 Massachusetts Udall '76 Committee

Payee's Function	Date	Amount of Check	Amount Unsupported as of 5/4/79	Unsupported		Supported	
				Type of * Documents	Intended Purpose per Documents Provided For FEC Inspection	Amount Supported	Type of * Documents
Field Person	2/2/76	\$150.00	\$150.00	1 + 5	Reception Expenses		
Field Person	3/1/76	\$212.00	\$212.00	1 + 5	Travel and Food Advance		
Field Person	2/21/76	\$150.00	\$150.00	1	Travel Advance		
Field Person	2/23/76	\$100.00	\$100.00	1	Travel and Food Advance		
Field Person	2/25/76	\$112.00	\$112.00	1 + 5	Travel and Food Advance		
	2/26/76	\$212.00	\$212.00	1	Travel and Food Advance		

- Type of Documentation: (1) Cancelled check (Committee account to payee) and Committee generated memorandum.
- (2) Cancelled Committee check only.
- (3) Memorandum from payee without cancelled check to the ultimate vendor/payee, or other ultimate vendor/payee documentation.
- (4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.
- (5) Committee effort - letter sent to payee.

Schedule of Unsupported Expenditures as of 5/4/79
Massachusetts Udall '76 Committee

Payee's Function	Date	Amount of Check	Amount Unsupported as of 5/4/79	Unsupported		Supported	
				Type of * Documents	Intended Purpose per Documents Provided For FEC Inspection	Amount Supported	Type of * Documents
Field Person	2/25/76	\$212.00	\$212.00	1 + 7	Travel and Food Advance		
	3/1/76	\$100.00	\$100.00	1 + 7	Travel and Food Advance		
Field Person	2/25/76	\$212.00	\$212.00	1 + 7	Travel and Food Advance		
	1/1/76	\$100.00	\$ 67.63	1 + 7	Travel and Food Advance	\$ 32.37	4
Field Person	5/1/76	\$125.00	\$125.00	1	Reimbursed Transportation and Food for February		
Field Person	2/19/76	\$263.78	\$212.00	1	Field Advance	\$ 51.78	4
Bank	3/2/76	\$343.75	\$155.75	1	Money Order	\$188.00	4

- (1) Cancelled check (Committee account to payee) and Committee generated memorandum.
- (2) Cancelled Committee check only.
- (3) Memorandum from payee without cancelled check to the ultimate vendor/payee, or other ultimate vendor/payee documentation.
- (4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.
- (5) Committee effort - letter sent to payee.
- (7) Response received from payee - response inadequate.

9 2 0 4 0 3 2 4 0 4 0

850

Udall '76 Committee

Attachment 7 Page 4 of 5

Schedule of Unsupported Expenditures as of 5/4/79
Massachusetts Udall '76 Committee

Payee's Function	Date	Amount of Check	Amount Unsupported as of 5/4/79	Unsupported		Supported	
				Type of * Documents	Intended Purpose per Documents Provided For FEC Inspection	Amount Supported	Type of * Documents
Field Person	3/3/76	\$150.00	\$150.00	1	Travel Expenses		
Field Person	3/1/76	\$100.00	\$100.00	1	Street Campaigning		
	3/1/76	\$100.00	\$100.00	1	Deposit for Sound Equipment		
Field Person	4/2/76	\$250.00	\$250.00	1	Reimbursed Expenses		
	4/2/76	\$750.00	\$750.00	1	Transportation Expenses		
	2/23/76	\$120.00	\$120.00	1	Travel and Food Expenses		
Field Person	4/2/76	\$250.00	\$250.00	1	Reimbursed Expenses		
	4/2/76	\$160.00	\$160.00	1	Travel Expenses		

- Type of Documentation:
- (1) Cancelled check (Committee account to payee) and Committee generated memorandum.
 - (2) Cancelled Committee check only.
 - (3) Memorandum from payee without cancelled check to the ultimate vendor/payee, or other ultimate vendor/payee documentation.
 - (4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.
 - (5) Committee effort - letter sent to payee.

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Schedule of Unsupported Expenditures as of 5/4/79
Massachusetts Udall '76 Committee

Payee's Function	Date	Amount of Check	Amount Unsupported as of 5/4/79	Unsupported		Supported	
				Type of * Documents	Intended Purpose per Documents Provided For FEC Inspection	Amount Supported	Type of * Documents
Field Person	6/5/76	\$150.00	\$ 150.00	1	Reimbursed Travel Expenses		
Field Person	2/18/76	\$235.00	\$ 235.00	1	Reimbursed Expenses		
	3/1/76	\$260.00	\$ 260.00	1	Reimbursed Expenses		
Field Person	2/23/76	\$250.00	\$ 250.00	1	Reimbursed Expenses		
Total			<u>\$5,822.38</u>				

- Type of Documentation:
- (1) Cancelled check (Committee account to payee) and Committee generated memorandum.
 - (2) Cancelled Committee check only.
 - (3) Memorandum from payee without cancelled check to the ultimate vendor/payee, or other ultimate vendor/payee documentation.
 - (4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.
 - (5) Committee effort - letter sent to payee.

Ulall '76 Committee

Attachment 8 Page 1 of 1

Schedule of Unsupported Expenditures as of 5/4/79
Massachusetts Special Events Committee

Payee's Function	Date	Amount of Check	Unsupported		Supported	
			Amount Unsupported as of 5/4/79	Type of * Documents	Amount Supported	Type of * Documents
Field Person	2/26/75	\$800.00	\$ 800.00	5 + 1		Reimbursed Deposit For Parker House
	5/28/75	\$120.00	\$ 120.00	5 + 1		Postage Reimbursement
Field Person	2/26/75	\$162.00	\$ 162.00	5		Reimbursed Postage
Total			\$1,082.00			

- Type of Documentation:
- (1) Cancelled check (Committee account to payee) and Committee generated memorandum.
 - (2) Cancelled Committee check only.
 - (3) Memorandum from payee without cancelled check to the ultimate vendor/payee, or other ultimate vendor/payee documentation.
 - (4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.
 - (5) Committee effort - letter sent to payee.

Schedule of Unsupported Expenditures as of 5/4/79
Michigan Udall for President Committee

Payee's Function	Date	Amount of Check	Amount Unsupported as of 5/4/79	Unsupported		Supported	
				Type of * Documents	Intended Purpose per Documents Provided For FEC Inspection	Amount Supported	Type of * Documents
Field Group	3/76	\$125.00	\$125.00	1	Fundraising Event		
Field Person	4/16/76	\$ 83.77	\$ 83.77	1 + 7	Reimbursed Field Expense		
Field Person	4/23/76	\$150.00	\$150.00	1	Reimbursed Field Expense		
	5/7/76	\$175.00	\$175.00	1	Reimbursed Field Expense		
Field Person	5/11/76	\$200.00	\$200.00	1	Reimbursed Expense - Phones		

- Type of Documentation:
- (1) Cancelled check (Committee account to payee) and Committee generated memorandum.
 - (2) Cancelled Committee check only.
 - (3) Memorandum from payee without cancelled check to the ultimate vendor/payee, or other ultimate vendor/payee documentation.
 - (4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.
 - (5) Committee effort - letter sent to payee.
 - (7) Response received from payee - response inadequate.

Schedule of Unsupported Expenditures as of 5/4/79
Michigan Udall for President Committee

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Payee's Function	Date	Amount of Check	Amount Unsupported as of 5/4/79	Unsupported		Supported	
				Type of * Documents	Intended Purpose per Documents Provided For FEC Inspection	Amount Supported	Type of * Documents
Field Person	5/19/76	\$384.11	\$384.11	1 + 7	Reimbursed Expenses		
Field Person	5/19/76	\$350.00	\$350.00	1	Reimbursed Expenses		
Field Person	5/14/76 5/19/76	\$246.39 \$177.85	\$246.39 \$154.00	1 1	Reimbursed Expenses Reimbursed Expenses	\$23.85	4
Field Person	5/19/76	\$178.51	\$178.51	1 + 7	Reimbursed Expenses		
Field Person	5/14/76	\$130.00	\$130.00	1	Reimbursed Expenses		
Field Person	5/19/76	\$152.02	\$152.02	1	Reimbursed Expenses		
- Field Person	5/19/76	\$155.48	\$155.48	1	Reimbursed Expenses		

- Type of Documentation:
- (1) Cancelled check (Committee account to payee) and Committee generated memorandum.
 - (2) Cancelled Committee check only.
 - (3) Memorandum from payee without cancelled check to the ultimate vendor/payee, or other ultimate vendor/payee documentation.
 - (4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.
 - (5) Committee effort - letter sent to payee.
 - (7) Response received from payee - response inadequate.

02

Schedule of Unsupported Expenditures as of 5/4/79
Michigan Udall for President Committee

Payee's Function	Date	Amount of Check	Amount Unsupported as of 5/4/79	Unsupported		Supported	
				Type of * Documents	Intended Purpose per Documents Provided For FEC Inspection	Amount Supported	Type of * Documents
Field Person	5/19/76	\$101.70	\$101.70	1	Reimbursed Expenses		
Field Person	5/19/76	\$143.00	\$143.00	1	Reimbursed Expenses		
Field Person	5/19/76	\$100.45	\$100.45	1	Reimbursed Expenses		
Field Person	5/7/76	\$125.00	\$125.00	1	Reimbursed Expenses		
Field Person	5/19/76	\$139.35	\$139.35	1	Reimbursed Expenses		
1 Field Person	5/14/76	\$175.00	\$175.00	1	Music		
Field Person	5/11/76	\$115.00	\$115.00	1	Reimbursed Expenses		

- Type of Documentation:
- (1) Cancelled check (Committee account to payee) and Committee generated memorandum.
 - (2) Cancelled Committee check only.
 - (3) Memorandum from payee without cancelled check to the ultimate vendor/payee, or other ultimate vendor/payee documentation.
 - (4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.
 - (5) Committee effort - letter sent to payee.

Schedule of Unsupported Expenditures as of 5/4/79
Michigan Udall for President Committee

Payee's Function	Date	Amount of Check	Amount Unsupported as of 5/4/79	<u>Unsupported</u>		<u>Supported</u>	
				Type of * Documents	Intended Purpose per Documents Provided For FEC Inspection	Amount Supported	Type of * Documents
Field Person	5/18/76	\$125.00	\$125.00	1	Reimbursed Expenses		
Field Person	5/19/76	\$123.85	\$123.85	1	Reimbursed Expenses		
Field Person	5/19/76	\$144.58	\$144.58	1	Reimbursed Expenses		
Field Person	5/19/76	\$101.55	\$101.55	1	Reimbursed Expenses		
Field Person	5/9/76	\$107.00	\$107.00	1	Reimbursed Expenses		

- Type of Documentation: (1) Cancelled check (Committee account to payee) and Committee generated memorandum.
- (2) Cancelled Committee check only.
- (3) Memorandum from payee without cancelled check to the ultimate vendor/payee, or other ultimate vendor/payee documentation.
- (4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.
- (5) Committee effort - letter sent to payee.

Schedule of Unsupported Expenditures as of 5/4/79
Michigan Udall for President Committee

Payee's Function	Date	Amount of Check	Amount Unsupported as of 5/4/79	Type of * Documents	Intended Purpose per Documents Provided For FEC Inspection	<u>Supported</u>	
						Amount Supported	Type of * Documents
Field Person	5/13/76	\$102.50	\$102.50	1	Reimbursed Expenses		
	5/12/76	\$140.00	\$140.00	1	Reimbursed Expenses		
Field Person	5/17/76	\$130.00	\$130.00	1	Reimbursed Expenses		
Field Person	5/14/76	\$275.00	\$275.00	1	Reimbursed Expenses		
	5/7/76	\$137.50	\$137.50	1	Reimbursed Expenses		
	5/19/76	\$472.15	\$472.15	1	Reimbursed Expenses		
Field Person	5/20/76	\$130.00	\$130.00	1	Advertising		
Field Person	5/14/76	\$162.47	\$162.47	1	Reimbursed Expenses		
	5/19/76	\$156.35	\$156.35	1	Reimbursed Expenses		

- Type of Documentation:
- (1) Cancelled check (Committee account to payee) and Committee generated memorandum.
 - (2) Cancelled Committee check only.
 - (3) Memorandum from payee without cancelled check to the ultimate vendor/payee, or other ultimate vendor/payee documentation.
 - (4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.
 - (5) Committee effort - letter sent to payee.

Schedule of Unsupported Expenditures as of 5/4/79
Michigan Udall for President Committee

Payee's Function	Date	Amount of Check	Amount Unsupported as of 5/4/79	Unsupported		Supported	
				Type of * Documents	Intended Purpose per Documents Provided For FEC Inspection	Amount Supported	Type of * Documents
Field Person	5/13/76	\$155.00	\$155.00	1	Reimbursed Expenses		
Person	5/18/76	\$643.01	\$643.01	1	Reimbursed Expenses		
Field Person	5/19/76	\$229.20	\$229.20	1	Reimbursed Expenses		
Field Person	5/19/76	\$174.85	\$174.85	1	Reimbursed Expenses		
Field Person	5/18/76	\$150.00	\$150.00	1	Band Expense		
Field Person	7/17/76	\$115.68	\$115.68	1	Car Rental		
Person	8/2/76	\$100.00	\$100.00	1	Car Rental		
Field Person	8/8/76	\$908.58	\$908.58	1	Loan Repayment		
Person	8/2/76	\$135.37	\$135.37	7	Reimbursed Expenses		

- Type of Documentation:
- (1) Cancelled check (Committee account to payee) and Committee generated memorandum.
 - (2) Cancelled Committee check only.
 - (3) Memorandum from payee without cancelled check to the ultimate vendor/payee, or other ultimate vendor/payee documentation.
 - (4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.
 - (5) Committee effort - letter sent to payee.
 - (7) Response received from payee - response inadequate.

Schedule of Unsupported Expenditures as of 5/4/79
Michigan Udall for President Committee

Payee's Function	Date	Amount of Check	Unsupported		Supported		
			Amount Unsupported as of 5/4/79	Type of * Documents	Intended Purpose per Documents Provided For FEC Inspection	Amount Supported	Type of * Documents
Field Person	5/3/76	\$121.56	\$ 121.56	1	Reimbursed Expenses		
Field Person	5/6/76	\$100.00	\$ 100.00	1	Reimbursed Expenses		
Field Person	5/14/76	\$227.00	\$ 227.00	1	Not Itemized		
Field Person	5/14/76	\$315.00	\$ 315.00	1	Not Itemized		
Field Person	5/4/76	\$600.00	\$ 600.00	1 + 7	Not Itemized		
Field Person	5/19/76	\$250.00	\$ 250.00	1	Not Itemized		
Field Person	5/19/76	\$150.00	\$ 150.00	1	Not Itemized		
Total Unsupported Expenditures Michigan Udall for President Committee			<u>\$10,066.98</u>				

- Type of Documentation:
- (1) Cancelled check (Committee account to payee) and Committee generated memorandum.
 - (2) Cancelled Committee check only.
 - (3) Memorandum from payee without cancelled check to the ultimate vendor/payee, or other ultimate vendor/payee documentation.
 - (4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.
 - (5) Committee effort - letter sent to payee.
 - (7) Response received from payee - response inadequate

Udall '76 Committee

Attachment 10 Page 1 of 1

Schedule of Unsupported Expenditures as of 5/4/79
New Hampshire Udall '76 Committee

Payee's Function	Date	Amount of Check	Amount Unsupported as of 5/4/79	Unsupported		Supported	
				Type of * Documents	Intended Purpose per Documents Provided For FEC Inspection	Amount Supported	Type of * Documents
Field Person	9/19/75	\$200.00	\$200.00	1 + 7	Field Advance		
Field Person	1/31/76	\$102.00	\$102.00	1 + 7	Field Expenses		
Total			\$302.00				

- Type of Documentation:
- (1) Cancelled check (Committee account to payee) and Committee generated memorandum.
 - (2) Cancelled Committee check only.
 - (3) Memorandum from payee without cancelled check to the ultimate vendor/payee, or other ultimate vendor/payee documentation.
 - (4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.
 - (5) Committee effort - letter sent to payee.
 - (7) Response received from payee - response inadequate.

Udall '76 Committee

Attachment 11 Page 1 of 2

Schedule of Unsupported Expenditures as of 5/4/79
New Jersey Udall '76 Committee

Payee's Function	Date	Amount of Check	Amount Unsupported as of 5/4/79	Type of * Documents	Intended Purpose per Documents Provided For FEC Inspection	<u>Supported</u>	
						Amount Supported	Type of * Documents
Field Person	4/2/76	\$105.38	\$105.38	1 + 5	Field Expenses		
Field Person	4/20/76	\$130.00	\$130.00	1 + 5	Postage Expenses		
Field Person	5/29/76	\$383.02	\$383.02	1 + 5	Field Expenses		
Treasurer	9/24/76	\$380.00	\$380.00	1 + 7	Field Expenses		
Field Person	10/11/76	\$200.43	\$200.43	1 + 5	Expenses-Telephone		

- Type of Documentation:
- (1) Cancelled check (Committee account to payee) and Committee generated memorandum.
 - (2) Cancelled Committee check only.
 - (3) Memorandum from payee without cancelled check to the ultimate vendor/payee, or other ultimate vendor/payee documentation.
 - (4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.
 - (5) Committee effort - letter sent to payee.
 - (7) Response received from payee - response inadequate.

Udall '76 Committee

Attachment 11 Page 2 of 2

Schedule of Unsupported Expenditures as of 5/4/79
New Jersey Udall '76 Committee

Payee's Function	Date	Amount of Check	Amount Unsupported as of 5/4/79	Unsupported		Supported	
				Type of * Documents	Intended Purpose per Documents Provided For FEC Inspection	Amount Supported	Type of * Documents
Field Person	6/7/76	\$118.46	\$ 118.46	1 + 5	Field Expenses		
Field Person	6/11/76	\$116.87	\$ 116.87	1 + 5	Field Expenses		
Field Person	6/11/76	\$106.00	\$ 106.00	1 + 5	Field Expenses		
Total			<u>\$1,540.16</u>				

- Type of Documentation:
- (1) Cancelled check (Committee account to payee) and Committee generated memorandum.
 - (2) Cancelled Committee check only.
 - (3) Memorandum from payee without cancelled check to the ultimate vendor/payee, or other ultimate vendor/payee documentation.
 - (4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.
 - (5) Committee effort - letter sent to payee.

Udall '76 Committee

Attachment 12 Page 1 of 1

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Schedule of Unsupported Expenditures as of 5/4/79
New Mexico Udall '76 Committee

Payee's Function	Date	Amount of Check	Amount Unsupported as of 5/4/79	<u>Unsupported</u>		<u>Supported</u>	
				Type of * Documents	Intended Purpose per Documents Provided For FEC Inspection	Amount Supported	Type of * Documents
Field Person	5/15/76	\$145.00	\$145.00	1	Reimbursed Expense		
Field Person	6/5/76	\$170.03	\$170.03	1	Reimbursed Expense		
Field Person	6/22/76	\$108.03	\$108.03	1	Reimbursed Expense		
Field Person	4/20/76	\$200.00	\$200.00	1	Reimbursed Expenses		
Total			<u>\$623.06</u>				

- Type of Documentation: (1) Cancelled check (Committee account to payee) and Committee generated memorandum.
- (2) Cancelled Committee check only.
- (3) Memorandum from payee without cancelled check to the ultimate vendor/payee, or other ultimate vendor/payee documentation.
- (4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.
- (5) Committee effort - letter sent to payee.

090

Schedule of Unsupported Expenditures as of 5/4/79
New York Udall '76 Committee

Payee's Function	Date	Amount of Check	Amount Unsupported as of 5/4/79	Unsupported		Supported	
				Type of * Documents	Intended Purpose per Documents Provided For FEC Inspection	Amount Supported	Type of * Documents
Field Person	2/17/76	\$440.00	\$440.00	1	Field Expenses		
Field Person	5/4/76	\$468.00	\$468.00	1 + 5	Reimbursed Expense-Postage.		
Field Person	5/12/76	\$ 95.00	\$ 95.00	1	Field Expenses		
	5/24/75	\$ 55.00	\$ 55.00	1	Field Expenses		
	6/15/76	\$ 25.00	\$ 25.00	1	Field Expenses		
	7/7/76	\$200.00	\$200.00	1	Field Expenses		
	3/8/76	\$206.72	\$206.72	1	Field Expenses		
	3/8/76	\$150.00	\$150.00	1	Travel Expenses		
	3/13/76	\$100.00	\$100.00	1	Travel Expenses		
	3/24/76	\$125.00	\$125.00	1	Field Salaries - 5 workers		
	3/28/76	\$125.00	\$125.00	1	Travel Expenses -5 workers		
	4/3/76	\$100.00	\$100.00	1	Field Salaries - 4 workers		
	4/25/76	\$ 60.00	\$ 60.00	1	Telephone Expense		

Type of Documentation: (1) Cancelled check (Committee account to payee) and Committee generated memorandum.

(2) Cancelled Committee check only.

(3) Memorandum from payee without cancelled check to the ultimate vendor/payee, or other ultimate vendor/payee documentation.

(4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.

(5) Committee effort - letter sent to payee.

Udall '76 Committee

Attachment 13 Page 2 of 4

Schedule of Unsupported Expenditures as of 5/4/79
New York Udall '76 Committee

Payee's Function	Date	Amount of Check	Amount Unsupported as of 5/4/79	Type of * Documents	Supported	
					Intended Purpose per Documents Provided For FEC Inspection	Amount Supported
Field Person	3/8/76	\$200.00	\$200.00	1 + 5	Field Expense-Phone Deposit	
Field Person	3/2/76	\$124.69	\$124.69	1 + 5	Field Expenses	
	3/16/76	\$ 19.67	\$ 19.67	1 + 5	Field Expenses	
	4/2/76	\$290.00	\$290.00	1 + 5	Petty Cash Advance	
Financial Coordinator	3/10/76	\$175.00	\$175.00	1	Campaign Expenses	
	3/16/76	\$200.00	\$200.00	1	Campaign Expenses	
	3/23/76	\$200.00	\$200.00	1	Printing	
	3/19/76	\$200.00	\$200.00	1	Mailing	
Field Person	3/15/76	\$200.00	\$200.00	1 + 5	Field Expenses	

Type of Documentation: (1) Cancelled check (Committee account to payee) and Committee generated memorandum.

(2) Cancelled Committee check only.

(3) Memorandum from payee without cancelled check to the ultimate vendor/payee, or other ultimate vendor/payee documentation.

(4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.

(5) Committee effort - letter sent to payee.

Schedule of Unsupported Expenditures as of 5/4/79
New York Udall '76 Committee

Payee's Function	Date	Amount of Check	Amount Unsupported as of 5/4/79	Unsupported		Supported	
				Type of * Documents	Intended Purpose per Documents Provided For FEC Inspection	Amount Supported	Type of * Documents
Field Person	3/29/76	\$100.00	\$100.00	1, 5 + 7	Supplies		
Field Person	4/6/76	\$ 75.00	\$ 75.00	1	Travel Expenses		
Field Person	4/6/76 4/13/76	\$125.00 \$125.00	\$125.00 \$125.00	1 1	Travel Expenses Travel Expenses		
Field Person	3/25/76 4/6/76	\$200.00 \$ 14.77	\$200.00 \$ 14.77	1 + 5 1 + 5	Reimbursed Expense-Supplies Reimbursed Expense-Supplies		
Field Person	3/26/76	\$104.16	\$104.16	1 + 5	Petty Cash Fund		

- Type of Documentation:
- (1) Cancelled check (Committee account to payee) and Committee generated memorandum.
 - (2) Cancelled Committee check only.
 - (3) Memorandum from payee without cancelled check to the ultimate vendor/payee, or other ultimate vendor/payee documentation.
 - (4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.
 - (5) Committee effort - letter sent to payee.
 - (7) Response received from payee - response inadequate.

Schedule of Unsupported Expenditures as of 5/4/79
New York Udall '76 Committee

Payee's Function	Date	Amount of Check	Amount Unsupported as of 5/4/79	<u>Unsupported</u>		<u>Supported</u>	
				Type of * Documents	Intended Purpose per Documents Provided For FEC Inspection	Amount Supported	Type of * Documents
Field	3/21/76	\$100.00	\$ 100.00	1	Supplies		
Person	3/23/76	\$260.66	\$ 260.66	1	Hauling Supplies		
Field	3/23/76	\$100.00	\$ 100.00	1 + 5	Petty Cash Advance		
Person							
Field	3/23/76	\$100.00	\$ 100.00	1 + 5	Travel Expenses		
Person	3/23/76	\$ 50.00	\$ 50.00	1 + 5	Travel Expenses		
	4/2/76	\$ 50.00	\$ 50.00	1 + 5	Supplies		
Field	4/2/76	\$100.00	\$ 100.00	1	Advance Expenses		
Person							
Total			<u>\$5,271.67</u>				

- Type of Documentation: (1) Cancelled check (Committee account to payee) and Committee generated memorandum.
- (2) Cancelled Committee check only.
- (3) Memorandum from payee without cancelled check to the ultimate vendor/payee, or other ultimate vendor/payee documentation.
- (4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.
- (5) Committee effort - letter sent to payee.

Schedule of Unsupported Expenditures as of 5/4/79
Ohio Udall '76 Committee

Payee's Function	Date	Amount of Check	Amount Unsupported as of 5/4/79	Type of * Documents	Supported	
					Intended Purpose per Documents Provided For FEC Inspection	Amount Supported
Field	5/27/76	\$200.00	\$200.00	1 + 7	Cleveland-Cash	
Person	5/28/76	\$200.00	\$200.00	2 + 7	Petty Cash	
	6/4/76	\$300.00	\$300.00	1 + 7	Petty Cash	
	6/9/76	\$200.00	\$200.00	1 + 7	Petty Cash	
Field	6/2/76	\$105.00	\$105.00	1	Petty Cash	
Person						
Field	6/3/76	\$500.00	\$500.00	1	Reimbursed Expense-Phone Deposit	
Person						
Field	6/3/76	\$125.00	\$125.00	1 + 7	Field Expenses	
Person						

- Type of Documentation:
- (1) Cancelled check (Committee account to payee) and Committee generated memorandum.
 - (2) Cancelled Committee check only.
 - (3) Memorandum from payee without cancelled check to the ultimate vendor/payee, or other ultimate vendor/payee documentation.
 - (4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.
 - (5) Committee effort - letter sent to payee.
 - (7) Response received from payee - response inadequate.

Schedule of Unsupported Expenditures as of 5/4/79
Ohio Udall '76 Committee

Payee's Function	Date	Amount of Check	Unsupported		Supported	
			Amount Unsupported as of 5/4/79	Type of * Documents	Intended Purpose per Documents Provided For FEC Inspection	Amount Supported
Creditor	6/3/76	\$540.00	\$540.00	1	Loan Repayment	
Field Person	5/24/76 6/5/76	\$330.00 \$195.95	\$330.00 \$195.95	1 1	Start-up (13th)	
Field Person	6/8/76	\$130.00	\$130.00	1	Turnaround	
Field Person	6/9/76 6/9/76	\$280.00 \$750.00	\$280.00 \$750.00	1 1	Columbus-Cash Travel Advance	
Field Person	4/22/76	\$260.00	\$260.00	1 + 7	Reimbursed Expense-Stamps	
Field Group	5/4/76	\$150.00	\$150.00	1	Phone and Rent	

- Type of Documentation:
- (1) Cancelled check (Committee account to payee) and Committee generated memorandum.
 - (2) Cancelled Committee check only.
 - (3) Memorandum from payee without cancelled check to the ultimate vendor/payee, or other ultimate vendor/payee documentation.
 - (4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.
 - (5) Committee effort - letter sent to payee.
 - (7) Response received from payee - response inadequate.

Schedule of Unsupported Expenditures as of 5/4/79
Ohio Udall '76 Committee

073

Payee's Function	Date	Amount of Check	Amount Unsupported as of 5/4/79	Type of * Documents	Intended Purpose per Documents Provided For FEC Inspection	Supported	
						Amount Supported	Type of * Documents
Cash	5/7/76	\$150.00	\$ 150.00	1	Car Rental		
	5/21/76	\$200.00	\$ 200.00	1	Materials		
	5/21/76	\$300.00	\$ 300.00	1			
Field Person	5/24/76	\$126.42	\$ 126.42	1	Reimbursed Expense-Photos		
Field Person	5/24/76	\$300.00	\$ 300.00	1	Start-up (19th)		
Field Person	5/26/76	\$500.00	\$ 500.00	1	Petty Cash-Misc.		
	5/26/76	\$300.00	\$ 300.00	1	Petty Cash		
Field Person	5/24/76	\$106.40	\$ 106.40	1	Field Expenses		
Total			<u>\$6,248.77</u>				

- Type of Documentation:
- (1) Cancelled check (Committed account to payee) and Committee generated memorandum.
 - (2) Cancelled Committee check only.
 - (3) Memorandum from payee without cancelled check to the ultimate vendor/payee, or other ultimate vendor/payee documentation.
 - (4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.
 - (5) Committee effort - letter sent to payee.

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Udall '76 Committee

Attachment 15 Page 1 of 1

Schedule of Unsupported Expenditures as of 5/4/79
Oregon Udall '76 Committee

Payee's Function	Date	Amount of Check	Unsupported		Supported		
			Amount Unsupported as of 5/4/79	Type of * Documents	Intended Purpose per Documents Provided For FEC Inspection	Amount Supported	Type of * Documents
Field Person	5/20/76	\$109.50	\$109.50	1	Field Expenses		
Total			<u>\$109.50</u>				

- Type of Documentation:
- (1) Cancelled check (Committee account to payee) and Committee generated memorandum.
 - (2) Cancelled Committee check only.
 - (3) Memorandum from payee without cancelled check to the ultimate vendor/payee, or other ultimate vendor/payee documentation.
 - (4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.
 - (5) Committee effort - letter sent to payee.

Schedule of Unsupported Expenditures as of 5/4/79
 Pennsylvania Udall '76 Committee

Payee's Function	Date	Amount of Check	Amount Unsupported as of 5/4/79	Type of * Documents	Intended Purpose per Documents Provided For FEC Inspection	<u>Supported</u>	
						Amount Supported	Type of * Documents
Field Person	2/11/76	\$205.00	\$205.00	1	Postage		
Field Person	2/14/76	\$125.00	\$125.00	1	Personal Services		
Field Person	4/20/76	\$170.00	\$170.00	1	Field Expenses		
Field Person	5/76	\$115.00	\$115.00	1	Per Diem Reimbursement		

- Type of Documentation:
- (1) Cancelled check (Committee account to payee) and Committee generated memorandum.
 - (2) Cancelled Committee check only.
 - (3) Memorandum from payee without cancelled check to the ultimate vendor/payee, or other ultimate vendor/payee documentation.
 - (4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.
 - (5) Committee effort - letter sent to payee.

Schedule of Unsupported Expenditures as of 5/4/79
 Pennsylvania Udall '76 Committee

Payee's Function	Date	Amount of Check	Amount Unsupported as of 5/4/79	Unsupported		Supported	
				Type of * Documents	Intended Purpose per Documents Provided For FEC Inspection	Amount Supported	Type of * Documents
Field Person	4/19/76	\$ 150.00	\$ 150.00	2	Scranton-Wilkes Barre Exp.		
Field Person	4/19/76 4/26/76	\$1,500.00 \$1,300.00	\$1,500.00 \$1,300.00	2 2	Pittsburgh Field Operations Pittsburgh Field Operations		
Field Person	4/23/76 4/22/76	\$ 500.00 \$ 650.00	\$ 500.00 \$ 650.00	2 + 7 2 + 7	Harrisburg Field Operations Harrisburg Field Operations		
Field Person	4/20/76 4/16/76	\$ 400.00 \$ 300.00	\$ 400.00 \$ 300.00	4 2	Erie Operating Erie		
Field Person	4/26/76 4/24/76	\$ 400.00 \$1,500.00	\$ 400.00 \$1,500.00	2 2	Phila Suburban Vol. Exps. Election Day Expenses		

- Type of Documentation: (1) Cancelled check (Committee account to payee) and Committee generated memorandum.
- (2) Cancelled Committee check only.
- (3) Memorandum from payee without cancelled check to the ultimate vendor/payee, or other ultimate vendor/payee documentation.
- (4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.
- (5) Committee effort - letter sent to payee.
- (7) Response received from payee - response inadequate.

Schedule of Unsupported Expenditures as of 5/4/79
 Pennsylvania Udall '76 Committee
 Schedule of Checks Payable to Cash

Payee's Function	Date	Amount of Check	Amount Unsupported as of 5/4/79	Unsupported		Supported	
				Type of *	Intended Purpose per Documents Provided For FEC Inspection	Amount Supported	Type of *
Field Person	4/15/76	\$400.00	\$ 400.00	2	Cash on Hand		
	4/23/76	\$900.00	\$ 900.00	2	Election Day Expenses		
	4/26/76	\$350.00	\$ 350.00	2	Volunteer Expenses		
	4/26/76	\$400.00	\$ 400.00	2	Check cashing, etc.		
	4/26/76	\$180.00	\$ 180.00	2	Certified Check-Pittsburgh		
	4/14/76	\$120.00	\$ 120.00	2	Greyhound-COD from Wisconsin		
	4/20/76	\$565.00	\$ 565.00	2	Postage-LaSalle Ad. Expense		
	4/21/76	\$400.00	\$ 400.00	2	Advance-Gas, Scheduling Sup.		
	4/15/76	\$385.00	\$ 385.00	2	April 17 Expenses		
	2/17/76	\$130.00	\$ 130.00	2	Delegate Filing Fees		
	4/22/76	\$375.00	\$ 375.00	2	Harrisburg: 1/22-23		
	Total		<u>\$11,520.00</u>				

- Type of Documentation: (1) Cancelled check (Committee account to payee) and Committee generated memorandum.
- (2) Cancelled Committee check only.
- (3) Memorandum from payee without cancelled check to the ultimate vendor/payee, or other ultimate vendor/payee documentation.
- (4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.
- (5) Committee effort - letter sent to payee.

Schedule of Unsupported Expenditures as of 5/4/79
Udall '76 South Dakota

Payee's Function	Date	Amount of Check	Amount Unsupported as of 5/4/79	Unsupported		Supported	
				Type of * Documents	Intended Purpose per Documents Provided For FEC Inspection	Amount Supported	Type of * Documents
Field Person	5/20/76	\$125.00	\$125.00	1 + 5	Field Advance		
Field Person	5/26/76	\$160.00	\$160.00	1 + 5	Reimbursement for Stamps		
Total			<u>\$285.00</u>				

- Type of Documentation:
- (1) Cancelled check (Committee account to payee) and Committee generated memorandum.
 - (2) Cancelled Committee check only.
 - (3) Memorandum from payee without cancelled check to the ultimate vendor/payee, or other ultimate vendor/payee documentation.
 - (4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.
 - (5) Committee effort - letter sent to payee.
 - (7) Response received from payee - response inadequate.

Schedule of Unsupported Expenditures as of 5/4/79
Wisconsin Udall '76 Committee

<u>Payee</u>	<u>Date</u>	<u>Amount of Check</u>	<u>Amount Unsupported as of 5/4/79</u>	<u>Unsupported</u>		<u>Supported</u>	
				<u>Type of *</u> <u>Documents</u>	<u>Intended Purpose per</u> <u>Documents Provided For</u> <u>FEC Inspection</u>	<u>Amount</u> <u>Supported</u>	<u>Type of *</u> <u>Documents</u>
Cash	12/17/75	\$400.00	\$400.00	1	Stamps		
Cash	3/13/76	\$300.00	\$300.00	1 + 5	Advance - Petty Cash		
Cash	3/23/76	\$150.00	\$150.00	1	Adv. Exp.		
Cash	3/24/76	\$150.00	\$150.00	1	Adv. Gas Exp.		

- Type of Documentation:
- (1) Cancelled check (Committee account to payee) and Committee generated memorandum.
 - (2) Cancelled Committee check only.
 - (3) Memorandum from payee without cancelled check to the ultimate vendor/payee, or other ultimate vendor/payee documentation.
 - (4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.
 - (5) Committee effort - letter sent to payee.

Schedule of Unsupported Expenditures as of 5/4/79
Wisconsin Udall '76 Committee

Payee	Date	Amount of Check	Amount Unsupported as of 5/4/79	Unsupported		Supported	
				Type of * Documents	Intended Purpose per Documents Provided For FEC Inspection	Amount Supported	Type of * Documents
Cash	3/25/76	\$150.00	\$150.00	1	Advance Expenses		
Cash	4/2/76	\$175.00	\$175.00	1 + 5	Advance Expenses		
Cash	4/2/76	\$200.00	\$200.00	1 + 7	Petty Cash Fund		
Cash	4/4/76	\$120.00	\$120.00	1 + 7	Petty Cash		

- Type of Documentation:
- (1) Cancelled check (Committee account to payee) and Committee generated memorandum.
 - (2) Cancelled Committee check only.
 - (3) Memorandum from payee without cancelled check to the ultimate vendor/payee, or other ultimate vendor/payee documentation.
 - (4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.
 - (5) Committee effort - letter sent to payee.
 - (7) Response received from payee - response inadequate.

Schedule of Unsupported Expenditures as of 5/4/79
Wisconsin Udall '76 Committee

Payee	Payee's Function	Date	Amount of Check	Amount Unsupported as of 5/4/79	Unsupported		Supported	
					Type of * Documents	Intended Purpose per Documents Provided For FEC Inspection	Amount Supported	Type of * Documents
Cash		8/19/75	\$200.00	\$200.00	1	Advance-Bedard Expenses		
	Field Person	7/30/76 8/22/75	\$138.00 \$420.00	\$138.00 \$420.00	1 1	Reimbursed Expenses Expenses		
	Field Person	2/26/76 3/2/76 3/10/76	\$100.00 \$268.00 \$200.00	\$100.00 \$268.00 \$200.00	1 + 7 1 + 7 1 + 7	Advance on Expenses Mileage and Expenses Advance Expenses		
	Field Person	3/30/76	\$100.00	\$100.00	1	Petty Cash		
	Field Person	3/11/76	\$150.00	\$150.00	1 + 5	Waukesha Hqs.		
	Field Person	7/18/75 8/15/75 2/12/76	\$300.00 \$400.00 \$200.00	\$300.00 \$400.00 \$200.00	3 + 7 1 + 7 1 + 7	Reimbursed Expenses Expense Advance Reimbursed Expenses		

- Type of Documentation:
- (1) Cancelled check (Committee account to payee) and Committee generated memorandum.
 - (2) Cancelled Committee check only.
 - (3) Memorandum from payee without cancelled check to the ultimate vendor/payee, or other ultimate vendor/payee documentation.
 - (4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.
 - (5) Committee effort - letter sent to payee.
 - (7) Response received from payee - responso inadequate.

Schedule of Unsupported Expenditures as of 5/4/79
 Wisconsin Udall '76 Committee

Payee's Function	Date	Amount of Check	Amount Unsupported as of 5/4/79	Unsupported		Supported	
				Type of * Documents	Intended Purpose per Documents Provided For FEC Inspection	Amount Supported	Type of * Documents
Field Person	8/28/75	\$395.00	\$395.00	1	Reimbursed Expenses		
Field Person	12/19/75	\$198.00	\$198.00	1	Reimbursed Expenses		
Field Person	12/20/75	\$196.00	\$196.00	1			
Field Person	3/22/76	\$240.00	\$240.00	1	Advertising and Voter Lists		
Field Person	3/29/76	\$200.00	\$200.00	1 + 5	Petty Cash		

- Type of Documentation:
- (1) Cancelled check (Committee account to payee) and Committee generated memorandum.
 - (2) Cancelled Committee check only.
 - (3) Memorandum from payee without cancelled check to the ultimate vendor/payee, or other ultimate vendor/payee documentation.
 - (4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.
 - (5) Committee effort - letter sent to payee.

Schedule of Unsupported Expenditures as of 5/4/79
Wisconsin Udall '76 Committee

Payee's Function	Date	Amount of Check	Amount Unsupported as of 5/4/79	<u>Unsupported</u>		<u>Supported</u>	
				Type of * Documents	Intended Purpose per Documents Provided For FEC Inspection	Amount Supported	Type of * Documents
Field Person	4/2/76	\$200.00	\$ 200.00	1	Petty Cash		
Field Person	4/8/76	\$555.33	\$ 555.33	1	Reimbursed Expenses		
Field Person	4/8/76	\$428.62	\$ 428.62	1	Reimbursed Expenses		
Field Person	4/9/76	\$338.00	\$ 338.00	1	Reimbursed Expenses		
Field Person	4/1/76	\$300.00	\$ 300.00	1 + 5	Advance Expenses		
Total			<u>\$7,171.95</u>				

- Type of Documentation: (1) Cancelled check (Committee account to payee) and Committee generated memorandum.
- (2) Cancelled Committee check only.
- (3) Memorandum from payee without cancelled check to the ultimate vendor/payee, or other ultimate vendor/payee documentation.
- (4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.
- (5) Committee effort - letter sent to payee.

Schedule of Unsupported Expenditures as of 5/4/79
Udall '76 Committee

Payee's Function	Date	Amount of Check	Amount Unsupported as of 5/4/79	Unsupported		Supported	
				Type of * Documents	Intended Purpose per Documents Provided For FEC Inspection	Amount Supported	Type of * Documents
Field Person	7/25/75	\$200.00	\$200.00	1	Not Reported		
Field Person	11/14/75	\$129.14	\$129.14	1 + 7	Not Reported		
Field Person	10/2/75 10/31/75	\$200.00 \$100.00	\$200.00 \$100.00	1 1	Travel Advance Travel Advance		
Field Person	11/7/75 11/21/75	\$100.00 \$128.90	\$100.00 \$128.90	1 + 5 1 + 5	Travel Advance Reimbursed Travel		

- Type of Documentation:
- (1) Cancelled check (Committee account to payee) and Committee generated memorandum.
 - (2) Cancelled Committee check only.
 - (3) Memorandum from payee without cancelled check to the ultimate vendor/payee, or other ultimate vendor/payee documentation.
 - (4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.
 - (5) Committee effort - letter sent to payee.
 - (7) Response received from payee - response inadequate.

Schedule of Unsupported Expenditures as of 5/4/79
Udall '76 Committee

Payee's Function	Date	Amount of Check	Amount Unsupported as of 5/4/79	Type of * Documents	Intended Purpose per Documents Provided For FEC Inspection	Supported	
						Amount Supported	Type of * Documents
Field Person	10/10/75	\$214.27	\$214.27	1 + 5	Reimbursed Expenses		
	10/20/75	\$120.35	\$120.35	1 + 5	Reimbursed Expenses		
Field Person	10/13/75	\$100.00	\$100.00	1	Travel Advance		
	10/22/75	\$150.00	\$150.00	1	Travel Advance		
	10/5/75	\$500.00	\$500.00	1	Not Reported		
Field Person	5/5/76	\$109.00	\$109.00	1 + 7	Not Reported		
Field Person	7/16/76	\$114.00	\$ 78.00	1, 5 + 7	Reimbursement	\$36.00	4
Field Person	12/8/75	\$100.00	\$100.00	1	Travel Advance		

- Type of Documentation:
- (1) Cancelled check (Committee account to payee) and Committee generated memorandum.
 - (2) Cancelled Committee check only.
 - (3) Memorandum from payee without cancelled check to the ultimate vendor/payee, or other ultimate vendor/payee documentation.
 - (4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.
 - (5) Committee effort - letter sent to payee.
 - (7) Response received from payee - response inadequate.

Schedule of Unsupported Expenditures as of 5/4/79
Udall '76 Committee

Payee's Function	Date	Amount of Check	Amount Unsupported as of 5/4/79	Unsupported		Supported	
				Type of * Documents	Intended Purpose per Documents Provided For FEC Inspection	Amount Supported	Type of * Documents
Field Person	3/18/76	\$206.19	\$ 206.19	1 + 7	Travel Reimbursement		
Field Person	7/1/76	\$148.00	\$ 148.00	1	Travel Expenses		
Field Person	7/15/76	\$250.00	\$ 250.00	1, 5 + 7	Travel Expense		
	3/76	\$750.00	\$ 750.00	1	Transfer		
Total			<u>\$3,583.85</u>				

- Type of Documentation: (1) Cancelled check (Committee account to payee) and Committee generated memorandum.
- (2) Cancelled Committee check only.
- (3) Memorandum from payee without cancelled check to the ultimate vendor/payee, or other ultimate vendor/payee documentation.
- (4) Receipted bill, or invoice and cancelled check, or contemporaneous memorandum and cancelled check relating to an ultimate vendor/payee.
- (5) Committee effort - letter sent to payee.
- (7) Response received from payee - response inadequate.

Schedule of Unsupported Expenditures as of 5/4/79
Washington Citizens for Udall '76

Payee's Function	Date	Amount of Check	Amount Unsupported as of 5/4/79	Unsupported		Intended Purpose per Documents Provided For FEC Inspection
				Type of Documents *		
Vendor	1/8/76	\$125.00	\$ 125.00	6		Stamps
	1/8/76	211.91	211.91	6		Stamps
	2/10/76	225.00	225.00	6		Stamps
	2/12/76	100.00	100.00	6		Stamps
	2/12/76	40.98	40.98	6		Stamps
	2/20/76	600.00	600.00	6		Stamps
	2/20/76	78.00	78.00	6		Stamps
	2/27/76	39.00	39.00	6		Stamps
Employee	1/14/76	500.00	500.00	6 + 7		Salary
	1/29/76	39.19	39.19	6 + 7		Expenses
	1/29/76	50.00	50.00	6 + 7		Salary
	2/5/76	50.00	50.00	6 + 7		Salary
	2/5/76	10.00	10.00	6 + 7		Supplies
	2/12/76	100.00	100.00	6 + 7		Salary
	2/20/76	525.00	525.00	6 + 7		Salary
	2/27/76	300.00	300.00	6 + 7		Salary

Documentation: (6) No cancelled check at time of audit.
(7) Response received from payee - response inadequate.

Schedule of Unsupported Expenditures as of 5/4/79
Washington Citizens for Udall '76

Payee's Function	Date	Amount of Check	Amount Unsupported as of 5/4/79	Unsupported	
				Type of Documents *	Intended Purpose per Documents Provided For FEC Inspection
Vendor	1/23/76	\$320.00	\$ 320.00	6	Telephone installation and deposit
Vendor	1/23/76	\$180.50	\$ 180.50	6	Office Rent
Government	1/29/76	15.75	15.75	6	Payroll taxes
Government	1/29/76	61.43	61.43	6	Payroll taxes
Vendor	1/8/76	20.48	20.48	6	Distribute fundraising materials
Vendor	2/5/76	11.43	11.43	6	Rubber stamp
	2/20/76	5.69	5.69	6	Rubber stamp
Vendor	2/10/76	250.00	250.00	6	Printing
Field Person	2/20/76	23.36	<u>23.36</u>	6	Supplies
Total Unsupported Expenditures Washington Citizens for Udall '76			<u>\$3,882.72</u>		

Documentation: (6) No cancelled check at time of audit.

Exhibit B

LETTERS SUBMITTED BY THE UDALL '76 COMMITTEE
Stating The Committee Position and Efforts To Comply

02040334076

MORRIS K. UDALL
IN DISTRICT OF ARIZONA

221 CANNON HOUSE OFFICE BUILDING
205/225-4100

CONSTITUENT SERVICE
301 WEST CONGRESS
TUCSON, ARIZONA 85701
602/726-6404

CONGRESS OF THE UNITED STATES
HOUSE OF REPRESENTATIVES
WASHINGTON, D.C. 20515

IDENTIFIED
LETTERS AND REGULAR AFFAIRS
MAIL ROOM
POST OFFICE AND CIVIL SERVICE

March 5, 1979

'79 MAR 5 PM 4:43
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Honorable Joan D. Aikens
Chairperson
Federal Election Commission
1325 K Street, N. W.
Washington, D. C. 20463

HAND DELIVERED

Dear Madame Chairperson:

Enclosed please find the Udall '76 Committee and affiliated committee's reply to the findings and conclusions raised in the Federal Election Commission's interim audit report, approved by the Commission on November 15, 1978.

As always, we have endeavored to comply with the provisions of the Federal Election Campaign Act of 1971, as amended. We are still attempting to provide the Commission with adequate documentation on a variety of expenditures made by the Udall '76 Committee and our several affiliated committees. We will promptly forward to the Commission any additional material that becomes available after submission of this letter on March 5, 1979.

If you should have any additional questions, please contact Mr. Ed Coyle of my staff at 202/225-9790.

Sincerely,

M. Udall
Morris K. Udall

Enclosures

James G. Keene
 Page 2 - \$1112
 Page 2 - \$1000

Elizabeth F. Williams
 Milton Williams
 George H. Williams
 Louise Williams
 John H. Williams
 John Williams
 Charles G. Williams
 Howard G. Williams
 Michael H. Williams
 John H. Williams
 John H. Williams
 George H. Williams

1. CONTRIBUTION LIMITATIONS

The UHall '76 Committee is in the process of making the appropriate refunds to those contributors who had exceeded the \$1000.00 contribution limitation. The total value of the excessive portion of these contributions is \$6857.00. The following is a summary of contributions in excess of limitation:

NAME	CONTRIBUTION	EXCESS
James G. Keene	1112	112
Elizabeth F. Williams	1112	112
Milton Williams	1112	112
George H. Williams	1112	112
Louise Williams	1112	112
John H. Williams	1112	112
John Williams	1112	112
Charles G. Williams	1112	112
Howard G. Williams	1112	112
Michael H. Williams	1112	112
John H. Williams	1112	112
John H. Williams	1112	112
George H. Williams	1112	112
TOTAL	11120	1120

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CONTRIBUTOR	TOTAL CONTRIBUTION	AMOUNT OF EXCESS	REFUND CHECK NO.	DATE (CHECK)	AMOUNT OF CHECK
John J. Farrelly	\$1750.00	\$ 750.00	#3837	7/27/78	\$ 750.00
Armand Ortega	2000.	1000.	3840	7/27/78	1000.
Jeno Paulucci	1250.	250.	3839	7/27/78	250.
Harold Arp	1150.	150.	3841	7/27/78	150.
Renz L. Jennings	1100.	100.	3876	3/01/79	100.
Mrs. Stanley (Cecelia) P. Matthews	2000.	1000.	VEC (2491 3843 3860)	{ 5/26/76 7/27/78 8/21/78	{ 250. 250. 500.
Phaebe P. Pack	1250.	250.	3844	7/27/78	250.
Edwin P. Romanoski	1200.	200.	3845	7/27/78	200.
Viola W. Bernard	1025.	25.	3846	7/27/78	25.
Michael P. Hoyt	1342.	342.	3847	7/27/78	342.
Edward S. Redstone	1020.	20.	3848	7/27/78	20.
Charles C. Holt	1050.	50.	3849	7/27/78	50.
Joan Crossell	1125.	125.	3850	7/27/78	125.
John H. Gutfreund	1100.	100.	3851	7/27/78	100.
Louise Ottinger	1675.	675.	3874	3/01/79	675.
Suzanne B. Stringe	1100.	100.	3853	7/27/78	100.
Miriam Bittenworth	1350.	350.	3854	7/27/78	350.
Elizabeth T. Williams	1220.	220.	{ 2767 3875	{ 5/26/76 8/21/78	{ 100. 120.
Leroy S. Wehrle	1200.	200.	3856	7/27/78	200.
Lydia S. Willits	1850.	850.	{ 3753 3857	{ 5/23/77 8/21/78	{ 100. 100.
Jonathan G. Kittle	1100.	100.	VEC 3863	8/21/78	100..

3. TRANSFERS BETWEEN PRESIDENTIAL AND CONGRESSIONAL PRINCIPAL CAMPAIGN COMMITTEES

Between November 18, 1976 and December 14, 1976, the Committee received transfers totalling \$23,000.00 from the O'Fall Election Committee.

The Committee obtained from the Congressional Committee the identity of the contributors whose contributions made up the funds transferred and has subsequently identified eleven (11) contributors as having exceeded the contribution limitation of \$1000.00. The following list summarizes our findings:

CONTRIBUTOR	CONTRIBUTION TO UNAL. ELECTION COMMITTEE	TOTAL CONTRIBUTIONS	AMOUNT OF EXCESS	REFUND CHECK NO.	DATE ISSUED	AMOUNT OF CHECK
R.L. Jennings	\$ 25.00	\$1100.00	\$ 100.00	3876	3/01/79	\$100.00
J.B. Overton	100.	1200.	200.	3859	8/21/78	100.
				3306	12/9/76	100.
J.G. Kittle	100.	1100.	100.	3863	8/21/78	100.
E.B. Berger	100.	1050.	50.	3862	8/21/78	50.
Mr. & Mrs. W.H. (C.B.) Ferry	500.	2750.	750.	3880	3/02/79	500.
E.W. Browne	100.	1100.	100.	3752	5/02/77	250.
C.P. Matthews	500.	2000.	1000.	3861	8/21/78	100.
				2491	5/26/76	250.
				3843	7/27/78	250.
				3860	8/21/78	500.
				3224	11/8/76	200.
E. De Concini	200.	1300.	300.	(CONTRIBUTION OF \$100.00 RETURNED)		
E.P. Borish	500.	1500.	500.	3881	3/02/79	500.
B.L. Parsley	100.	1100.	100.	3882	3/02/79	100.
C. Shell	100.	1050.	50.	3883	3/02/79	50.

RECEIVED FROM THE
 STATE OF ALASKA
 DEPARTMENT OF REVENUE
 1200 WEST 12TH AVENUE
 JUNEAU, ALASKA 99801
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 STATE OF ALASKA
 DEPARTMENT OF REVENUE
 1200 WEST 12TH AVENUE
 JUNEAU, ALASKA 99801

As per the recommendation of the Audit Division, copies of both sides of the cancelled refund checks (where applicable) are attached along with Matching Fund Galley pages for the detail related to each contributor listed on this summary. (SEE UDALL ATTACHMENT #6) Copies of the Committee's ledger sheets and memorandum are also included. (SEE UDALL ATTACHMENT #6)

4. DISCLOSURE OF CONTRIBUTOR'S OCCUPATION AND PRINCIPAL PLACE OF BUSINESS

The Udall '76 Committee wishes to remind the Audit Division that all solicitations of funds by the Udall '76 Committee for use in mail or at fundraisers always included questionnaires concerning the contributor's occupation and principal place of business. Copies of samples of our various solicitations are attached. (SEE UDALL ATTACHMENT #7)

As stated in our letter of May 4, 1977, the Udall '76 Committee has sent letters (in some cases, second letters) requesting this information be sent. A sample of our efforts are attached. (SEE UDALL ATTACHMENT #8)

As per the recommendation of the Audit Division, in those cases where a reply was received (ten), the Udall '76 Committee is enclosing a list of our findings which will serve as an amendment to the disclosure reports. (SEE UDALL ATTACHMENT #9)

In addition, the Udall '76 Committee, in February of 1977, gave the Commission a complete set of all of the Committee's contributors from inception through January of 1977. That list, while used separately for purposes of our final matching payment submissions, also includes the final computer run of all our contributors and includes as much information as the Committee could gather on contributors occupation and principal place of business information. We fully feel that best efforts were made to comply with Section 434(b)(2) of Title II, U.S.C., and that our complete contributor galley given to the F.E.C. in February of 1977 represents our amendment to our disclosure reports.

Finally, in cases where the contribution information is incomplete, we can only assume that the contributor did not wish to comply.

5. DISCLOSURE OF TRANSFERS - IN

The Udall '76 Committee has determined, after a review of our records, that the Committee or its' affiliates did receive five of the transfers - in listed on the FEC's attachment A, page 14. The Udall '76 Committee did not cash a \$2,000.00 check from the C.W.A. District 2 PAC. That check, reported by the C.W.A. District 2 PAC on May 3, 1976 was in fact sent back to the C.W.A. District 2 PAC uncashed because they had already reached their contribution limitation.

In all other cases, the dollar value of the contributions was included in our disclosure reports, but incorrectly listed. Enclosed is a summary of the circumstances surrounding each non-affiliated Committee's transfers-out to our Committee(s).

- 1) F.I.R.E. - P.A.C. not originally listed on disclosure reports because the check was under \$100. However it is now itemized on our final galley (submitted to the F.E.C. in February of 1977) as:
International Association of
Fire Fighters
1750 New York Avenue
Washington, D. C. 20006
- 2) N.L.I. Testimonial Dinner Committee- New itemized on our final galley as:
National Life Institute
3251 Old Lee Highway
Fairfax, Virginia
- 3) People for Improvement of Education - listed as an unitemized contribution on the Oregon Udall '76 Committee's report, it is now listed on the final galley as:
People for Improvement of Education
6943 S. West Haines
Tigard, Oregon

4. Public Employees Organized to Promote Legislative Equality- Listed on our final galley as P.E.O.P.L.E. - AFSCME Committee
P.O. Box 6587
Washington, D. C.

5. UAW VCAP - Our records coincide with those of the F.E.C. with regards to this contribution which was never properly itemized on our disclosure reports. Our bank records and computer files indicate that the Udall '76 Committee deposited the check in question on March 30, 1976 in our American Indian National Bank - fundraising account. Our records also show that the contribution was coded by our computer personnel and give a "unique number" (046179) and should have been reported in our April 10, 1976 disclosure report. It was not. It should be listed as:
UAW V CAP
3000 E. Jefferson
Detroit, Michigan 48214 (SEE UDALL ATTACHMENT #10)

APPARENT UNQUALIFIED CAMPAIGN EXPENSES

1. Traffic Fines: As per the recommendation of the Audit Division, the Udall '76 Committee hereby encloses our check (#3877) payable to the United States Treasury in the amount of \$418.00 representing full reimbursement of unqualified Wisconsin Udall '76 Committee expenditures for traffic fines:

2. Inadequately Supported Expenditures: As stated in the interim report, the Audit Division listed expenditures totalling \$163,616.50 for which they found insufficient documentation to establish the expenditures connection to the campaign. As per a verbal agreement between the Audit Division of the FED and Ed Coyle of the Udall '76 staff, the Audit Division has agreed to accept a cancelled check only as sufficient documentation for expenditures totalling \$84,907.97 to commercial vendors. Of the remaining \$78,708.53 in expenditures to individuals the Udall '76 Committee and affiliated committees have used our best efforts to adequately support each expenditure made for which the Audit Division found insufficient documentation.

Attachments 11 to 34 contain copies of the Udall '76 Committee's and affiliated committees requests for documentation and any replies we may have received to date. Both letters to individuals and vendors are included.

Your review of these documents will further determine what portion of those expenditures totalling \$78,708.53 are still considered unqualified campaign expenses by the FEC.

Additionally, many of the individuals listed in the FEC report worked under an agreement where they were given subsistence wages to cover their expenses while working for the campaign. The checks issued to them were in recognition of the long hours they worked. Thus, the Committee cannot submit documentation for some of the individuals listed. We mention, however, that in a campaign that was so dependent on the willingness of individuals such as these to travel from state to state in connection with their campaign duties, these checks were for legitimate services and essential to the operation of our campaign and that the cancelled checks itself should be accepted as sufficient documentation for purposes of complying with Sec. 9038(b)(2), Title 26, U.S.C.

3. Allocation of State Expenditures: The Udall '76 Committee reported spending \$212,199.13 for the period of January 1, 1975 through June 30, 1978 in expenditures allocated to the State of New Hampshire. That figure was the aggregate of amounts spent by the Udall '76 Committee (National) and the New Hampshire Udall '76 Committee directly allocable to the State of New Hampshire. We are still in the process of completing our review of state by state allocations and will provide the Commission with a detailed listing of all those items we feel should not be allocated directly to New Hampshire. The information we requested from our New Hampshire affiliated arrived too late for inclusion in this letter so it will be sent to the FEC under separate cover as soon as it can be arranged in an orderly fashion.

C-2 UNMATCHABLE CONTRIBUTIONS

As per the recommendation of the Audit Division, the Udall '76 Committee hereby encloses our check (#5873) payable to the United States Treasury in the amount of \$225.00 representing our full repayment for contributions matched in excess of eligibility.

REPAYMENT SUMMARY:

Traffic Violation Fines	\$418.00
Contribution Matched in excess of eligibility	225.00
	<hr/>
TOTAL REPAYMENT	\$643.00

SUMMARY

In our estimation the only sections of the interim audit report of December 14, 1978 that are not fully satisfied with this response are section B-2 Inadequately Supported Expenditures and B-3 Allocation of State Expenditures. As stated previously, we will continue to make submissions as additional documentation arrives. We fully expect to answer any questions that might still exist about our spending level in New Hampshire and will be sending an addendum to this report shortly.

As to the remaining undocumented expenditures to individuals, we can only assure you that we will continue in our efforts to locate these people and secure receipts, but we must repeat our earlier point about the length of time that has passed since these checks were originally written, not to mention the fact that many of the individuals in question were students who have long since moved on to other things without leaving a forwarding address. The Udall '76 Committee was dependent on individuals who were willing to travel from primary state to primary state and live on subsistence level funds. Needless to say, these individuals even if they could be found today would not still be holding receipts.

Finally, the Udall '76 Committee as you know, was unique in that we authorized 50 separate state committee to spend money. We continue to work with the individual state treasurers to bring each of these committees into compliance. As you know this is where most of the problem exists-- not with the National Udall '76 Committee.

We have attempted to provide the Commission with as much materials as possible in this report. We hope that this report along with our follow up on the New Hampshire spending question will satisfy the Commission requests and allow the Udall '76 Committee to file its termination papers.

MORRIS K. UDALL
200 WEST WASHINGTON

200 CANNON HOUSE OFFICE BUILDING
WASHINGTON, D.C.

OFFICE OFFICE
201 WEST WASHINGTON
TUCSON, ARIZONA 85701
520/778-0000

CONGRESS OF THE UNITED STATES
HOUSE OF REPRESENTATIVES
WASHINGTON, D.C. 20515

RECEIVED
FEDERAL ELECTION
COMMISSION
POST OFFICE AND CIVIL SERVICE

March 30, 1979 79 MAR 30 PM 2:40

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Honorable Joan D. Aikens
Chairwoman
Federal Election Commission
1325 K Street, N. W.
Washington, D. C. 20463

MAILED 100

Dear Madame Chairwoman:

This is in further response to the FEC's letter of December 14, 1978, requesting additional material on a variety of items pertaining to the Udall '76 Committee. In this letter we are providing the FEC with a re-computation of our allocation of Primary Expenditures by State for a Presidential Candidate for New Hampshire.

Section B(3) of the FEC's December 14 letter asserted that the Udall '76 Committee had over spent its limit in New Hampshire by a total of \$25,474.88. We carefully reviewed our spending in New Hampshire from both our National and State affiliate records and have concluded that we actually spent a total of \$185,335.49 allocable to the State of New Hampshire. This new figure has been computed by subtracting out items that (a) should have been listed as Out-of-State Expenditures, (b) are exempt legal accounting and bookkeeping expenditures, (c) are media expenses that should be partially allocated to the State of Massachusetts, Vermont, Connecticut, Rhode Island, and Maine, and (d) were salaries partially exempt because the individuals involved spent a portion of their time in legal, bookkeeping, or fundraising activities. In addition, the Udall '76 Committee did not agree that all the items listed in the FEC's letter of December 14 regarding additional expenditures (page 9) to be allocated to New Hampshire should in reality be allocated to New Hampshire.

As always, the Udall '76 Committee is making every effort to comply with the requests of the Federal Election Commission. Please let us know what additional materials, if any, are further required. Ed Coyle of my staff can answer any questions you may have.

Sincerely,

Morris K. Udall

Enclosures

THIS STATIONERY PRINTED ON PAPER MADE WITH RECYCLED FIBERS

UDALL '76 COMMITTEE - ORIGINAL BREAKDOWN

Allocation of Primary Expenditures by State for a Presidential Candidate

NEW HAMPSHIRE

	<u>FROM STATE COMMITTEE</u>	<u>FROM NATIONAL COMMITTEE</u>	<u>TOTAL</u>
1975	\$25,841.37	\$32,099.39	\$57,940.76
Jan. 1976	70,616.63	7,646.36	78,262.99
Feb. 1976	54,933.25	805.00	55,738.25
March 1976	6,715.37	9,977.03	16,692.40
April 1976	<14.31>	-----	<14.31>
May 1976	5.77	779.18	784.95
June 1976	9.78	-----	9.78
July 1976	20.74	196.95	217.69
8/1-9/30/76	terminated	-----	-----
10/1-12/31/76	-----	825.11	825.11
1/1 - 3/31/77	-----	983.96	983.96
4/1 - 6/30/77	-----	757.10	757.10
7/1 - present	-----	-----	-----
TOTAL:	\$158,128.60	\$54,070.08	\$212,198.68

UDALL '76 COMMITTEE

Response to Items Raised by the F.E.C. Regarding New Hampshire Allocation

A. During the course of the F.E.C. audit, the F.E.C. determined that \$4,162.84 of print production from Martilla, Payne, Kiley, & Thorne, Inc. should be allocated to New Hampshire (page 9 of F.E.C. letter, Item A). Because the local officials of the New Hampshire Udall '76 Committee were not pleased with these productions, this material was never used during the New Hampshire campaign. Therefore, the Udall '76 Committee does not believe this item should be charged against the New Hampshire allocation.

B. The Udall '76 Committee does not dispute the findings of the F.E.C. on the \$3,647.89 in American Express Charges.

C. The \$4,800.00 in charges to Weston Associates the F.E.C. claims should be allocated to New Hampshire is not an accurate reflection of the nature of much of the material produced by Weston Associates in 1975. A substantial portion of these materials were produced primarily for fundraising purposes. Over \$50,000 was raised in New Hampshire in response to these appeals. We therefore feel that 50% of these expenditures should be exempted from the New Hampshire allocation, or \$2,400.00.

D. The Udall '76 Committee does not dispute the findings of the F.E.C. on the Concord Bank expenditure of \$5,265.39.

E. The Udall '76 Committee does not dispute the itemized fundraising expenditures of \$6,665.40.

F. During the course of the F.E.C.'s audit of our records, the F.E.C. determined that a total of \$6,934.13 in media produced in Massachusetts should be allocated to the New Hampshire expenditure limitation. (See page 9 of F.E.C. letter, Item F) This finding by the F.E.C. completely ignores the fact that media produced in Massachusetts not only "spills over" into New Hampshire, but also to the states of Connecticut, Rhode Island, Vermont, and Maine. The voting age population (V.A.P.) of New Hampshire as certified by the Secretary of Commerce to the Federal Election Commission on January 30, 1976, was 559,000. The V.A.P. of Massachusetts, New Hampshire, Rhode Island, Connecticut, Vermont, and Maine combined is 8,525,000. The State of New Hampshire then represents only 6.5% of the total V.A.P. in the Massachusetts media market. We therefore feel that if the F.E.C. is going to allocate Massachusetts media to New Hampshire, it should represent 6.5% of the total, or \$450.71 instead of \$6,934.13.

Re-computation of Additional National Expenditures allocated to New Hampshire

A.	Major Print Production	-----
B.	American Express Charges	\$3,647.89
C.	Weston Associates	2,400.00
D.	Concord Bank Expenditures	5,265.39
E.	New Hampshire Committee Fundraising (1/28/76- 2/24/76)	6,665.40
F.	Massachusetts Media Expenses	450.71
	TOTAL	\$18,429.39

UDALL '76 COMMITTEE...

Re-computation - National Committee

SALARIES

For 1975 the National Committee originally allocated \$29,673.50 to New Hampshire from salaries paid to workers in New Hampshire from the National Committee's bank account (Irving Trust Co.). However, no reduction was computed for the amount of time spent by individuals in legitimate fundraising and bookkeeping activities attributable to any one state. We have now recomputed the 1975 salary figures as \$21,329.60. That figure is reflected in the re-computed allocation of Primary Expenditures by state for New Hampshire (See Attachment #21)

Similarly, in January of 1976 the National Committee originally allocated \$6,130.46 to New Hampshire from salaries paid to workers in New Hampshire from the National Committee's bank account (Irving Trust Co.). However, as in 1975, no reduction was computed for the time individuals spent in legitimate fundraising and bookkeeping activities that are not attributable to any one state. We have now re-computed the Jan., 1976 salary figure as \$5233.67. That figure is reflected in the re-computed allocation of Primary Expenditure by state for New Hampshire (See Attachment #21)

M. J. White & Associates
Salaries

	1975		Jan, 1976		
	gross salary	acc. security	gross salary	acc. security	
Carrin	5416.66	316.36	1300.00	76.06	
Lightfoot	2571.65	373.92	757.77	44.72	
Lyness	4373.33	234.92	630.00	37.12	
Evans	4300.00	237.00	1000.00	52.73	
LaRue	1616.66	94.57			Original balance
Dudley	4353.33	270.72	600.00	35.10	
Howe	763.33	44.56	433.33	25.17	
Bennett	1300.00	76.02	650.00	38.01	
Nelson	450.00	26.33	450.00	26.33	
	<u>28032.23</u>	<u>1635.20</u>	<u>5901.66</u>	<u>373.29</u>	
		<u>29673.50</u>		<u>6133.46</u>	

Re-Computation

	1975		Jan, 1976	
* %	gross salary	acc. security	* % gross salary	acc. security
Carrin	2763.33	158.93	650.00	38.02
Lightfoot	3175.33	186.96	752.33	44.36
Lyness	4050.00	231.92	630.00	35.10
Evans	3300.00	175.50	850.00	43.79
LaRue	1616.66	94.57		
Dudley	3543.75	207.31	600.00	35.10
Howe	763.33	44.56	433.33	25.35
Bennett	1300.00	76.02	650.00	38.01
Nelson	450.00	26.33	450.00	26.33
	<u>20657.70</u>	<u>1201.72</u>	<u>4901.66</u>	<u>291.31</u>
		<u>21859.42</u>		<u>5203.67</u>

* Based on time spent in
regular business or
special security activity

NEW HAMPSHIRE UDALL '76 COMMITTEE

Re-computation of Allocations

Items to be allocated as Out-of-State Expenditures: The New Hampshire Udall '76 Committee originally allocated a total of \$158,123.60 from their expenditures to the overall allocation of primary expenditures for New Hampshire. After carefully reviewing these items, the New Hampshire Udall '76 Committee feels that a total of \$7,684.36 originally allocated to New Hampshire should not be allocated to New Hampshire because the expenditures were made in connection with bookkeeping, legal, and accounting activities, and in some cases, to individuals or businesses in connection with travel or other campaign activities outside of the State of New Hampshire. Those items, along with the canceled checks and receipts, are included as attachments 1 - 20 Out-of-State National CAP.

The New Hampshire Udall '76 Committee originally allocated in excess of \$31,574.03 from expenditures made to Weston Associates to the New Hampshire allocation. A review of those expenditures reveals that those expenditures made for radio stations were actually outside of New Hampshire or at stations near the border of Massachusetts, Maine, or Vermont. The percentage of V.A.P. in New Hampshire compared to the total of V.A.P. in New Hampshire, Massachusetts, Maine, and Vermont combined is only 10%. Therefore, the New Hampshire Udall '76 Committee feels that \$3,157.00 should be allocated, not the entire \$31,574.03 originally allocated. The back-up material for these expenditures will be sent under separate cover.

ATTACHMENT #21

UDALL '76 COMMITTEE

RE - COMPUTATION

Allocation of Primary Expenditures by State for a Presidential Candidate

New Hampshire

	<u>FROM STATE COMMITTEE</u>	<u>FROM NATIONAL COMMITTEE</u>	<u>TOTAL</u>
1975	\$25,841.37	\$24, 255.49	\$50,096.86
Jan. 1976	70,616.63	6,799.57	77,416.20
Feb. 1976	54,933.25	805.00	55,738.25
March 1976	6,715.37	9,977.03	16,692.40
April 1976	14.13	-----	14.13
May 1976	5.77	779.18	784.95
June 1976	9.78	-----	9.78
July 1976	20.74	196.95	217.69
8/1-9/30/76	terminated	-----	-----
10/1-12/31/76		825.11	825.11
1/1 - 3/31/77		983.96	983.96
4/1 - 6/30/77		757.10	757.10
7/1 - present		-----	-----
TOTAL	\$158,128.60	\$45,379.39	\$203,507.99

Add: Additional National Expenditures allocated to New Hampshire: + 18,429.39
Less: New Hampshire Out-of-State Expenditures: - 7,684.86
Less: New Hampshire Media re-allocated: - 28,417.03

Total, Re-computed Allocation of Primary Expenditures by State for a Presidential Candidate - New Hampshire \$185,835.49

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RECEIVED AT ALABAMA

Allocation of Primary Responsibility for State for a Professional Consultant

1967

STATE DEPT

STATE DEPT

Exhibit C

Legal Analysis

82040324093



FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO: Bob Costa
THROUGH: Orlando B. Potter
FROM: William C. Oldaker
SUBJECT: Interim Audit Report on the Udall '76 and
Affiliated Committees

The Office of General Counsel has reviewed the Interim Audit Report dated May 8, 1979, concerning the Udall '76 Committee and Affiliated Committees. The audit was conducted pursuant to 2 U.S.C. § 438(a)(8) and 26 U.S.C. § 9038(a). The following comments are made based on the information in the report.

The Office of General Counsel agrees with the conclusions of the auditors regarding the following sections of the audit report:

- II-A. Title II Reporting and Recordkeeping
 - (2) Supporting Documentation
 - (5) Disclosure of Transfers-in
- II-B. Apparent Unqualified Campaign Expenses
 - (1) Traffic Fines
- II-C. Repayment
 - (2) Unmatchable Contributions



31 200 4 2 3 2 4 0 9 4



(3) Appendices A through Q: Affiliated State Committees

The Office of General Counsel is in the process of instituting a matter under review which will encompass all of the apparent violations recommended for referral to this Office which, after analysis, are deemed sufficiently serious to warrant such action.

The Office of General Counsel offers the following analyses for the Commission's consideration with regard to certain other audit findings:

II-A. Title II Reporting and Recordkeeping

- (1) Contributions Limitations; and
- (3) Transfers Between Presidential and Congressional Principal Campaign Committees.

Both of the audit findings contained in these sections deal with the Committee's receipt and subsequent attempts to refund excessive contributions as required by the Commission on November 15, 1978. We agree with the recommendations that the Committee continue its efforts to complete the refund process. We do not, however, agree that repayment of funds to the U.S. Treasury is the appropriate remedy for the Committee's inability to have the refund checks negotiated by the payees. Repayment by the Committee is not contemplated in the Act as a remedial measure for contributions in excess of limitations.

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which would establish each expenditure's connection to the campaign. The Audit Division, therefore, recommends that the Committee be required to repay an amount equal to this sum. The Office of General Counsel finds that the documentation for certain of these expenditures is sufficient to show a connection with the campaign, thereby making those expenditures qualified.

a. Expenditures for Consultant Fees

Attachment 2 lists four expenditures made to two individuals, the intended purpose of which is listed as "consulting fee." The Commission has determined that expenditures made to vendors are adequately documented by a canceled check. Consultant fees are in the nature of payments to providers of services, and thus similar to cases involving vendors of products in that the consultant is the ultimate payee. Because the four items reported as being for consulting fees are supported by canceled checks, they are sufficiently documented and may be deemed qualified campaign expenditures.

b. Other Expenditures

The following expenditures are viewed by the Office of General Counsel as being adequately documented. In all

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instances the Audit Division is in possession of the cancelled check and Committee-generated memoranda plus a signed response from the payee which in each case this Office finds sufficiently detailed to show a connection between the use of monies involved and the campaign. The expenditures at issue are:

	<u>Payee</u>	<u>Amount</u>	<u>Location in Audit Report</u>
1.	Greg Andrews	\$ 212.00 100.00	Attachment 7, page 52 "
2.	Paul Costello	212.00 100.00	Attachment 7, page 52 " " " "
3.	Al Thomson	83.77	Attachment 9, page 56.
4.	Robert Bedard	384.11	Attachment 9, page 57.
5.	John Varney	100.00	Attachment 13, page 69.
6.	Sheldon Schecter	260.00	Attachment 14, page 72.
7.	David Evans	500.00 650.00	Attachment 16, page 76 " " "
8.	Cash (endorsed by William Bussey)	200.00	Attachment 18, page 80.
9.	Robert Bedard	300.00 400.00 200.00	Attachment 18, page 81. " " " " " "
10.	Edward Coyle	206.19	Attachment 19 page 86.

(3) Allocation of State Expenditures

With regard to sections A, B, C, D, and E, we concur with the Audit Division's conclusion that these expenditures may be allocated to New Hampshire and are in excess of allowable spending limits. The expenditures are deemed unqualified

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instances the Audit Division is in possession of the correct

and check and Committee-generated memoranda give a signed
campaign expenditures subject to repayment pursuant to
response from the payee which in each case this Office finds
26 U.S.C. § 9038(b)(2). The use of this repayment
sufficiently detailed to show a connection between the use
provision was approved in the Reagan audit.

We do not agree, however, with the methods devised
to determine the allocation of media advertising originating
in Boston, Massachusetts. It appears that neither the
Audit Division's reliance on a private company's television
marketing study nor the Udall Committee's allocation by
voting age population ("V.A.P.") in six adjacent states
satisfactorily fulfills the need for a reasonably accurate
measure of an imprecise and intangible quantity.

The Arbitron Television Market Report is a statistical
study defining the "area of dominant influence" for tele-
vision markets in specific geographic areas. The study,
according to the authors, is based upon measurable viewing
patterns and is designed as a television buying tool. It
does not include data for radio listeners.

Use of the Arbitron method for allocating media
expenditures to certain states does not allow consideration
of voting age population allocations such as are mentioned
in the Act. The Committee has employed a voting age
population (V.A.P.) approach to allocate percentages of
media expenditures among six states, thereby reducing
considerably the amount of these expenditures assessed
for New Hampshire. This latter method, however, ignores
the timing of the broadcast in relation to the date of the

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to the Committee's net outstanding campaign obligations as of June 14 but also stating that this submission was "not a recognition that (his) campaign is inactive for purposes of making qualified campaign expenditures under Chapter 96 of Title 26."

The statement submitted by the Candidate showed net outstanding obligations totaling \$662,700 on June 14, 1976. The amount of matching payments certified after that date equaled \$457,793.11. The Candidate has never disputed the application of June 14, 1976, as his date of ineligibility for purposes of calculating net outstanding campaign obligations.

Recommendation

Because the amount of matching payments received after the date of ineligibility never equaled the Committee's net outstanding campaign obligations on the date of ineligibility, no repayment of surplus matching funds is required.

Attachments:

Audit Referral

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FEDERAL ELECTION COMMISSION

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

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