



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

May 12, 1994

MEMORANDUM

TO: RON HARRIS
CHIEF, PRESS OFFICE

FROM: ROBERT J. COSTA *RJC*
ASSISTANT STAFF DIRECTOR
AUDIT DIVISION

SUBJECT: PUBLIC ISSUANCE OF THE FINAL AUDIT REPORT
ON WILDER FOR PRESIDENT COMMITTEE

Attached please find a copy of the final audit report package on Wilder for President Committee which was approved by the Commission on April 21, 1994.

Informational copies of the report have been received by all parties involved and the report may be released to the public.

Attachment as stated

cc: Office of General Counsel
Office of Public Disclosure ✓
Reports Analysis Division
FEC Library

REPORT OF THE AUDIT DIVISION
ON

Wilder for President

Approved April 21, 1994



FEDERAL ELECTION COMMISSION
999 E STREET, N.W.
WASHINGTON, D.C.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

**FINAL AUDIT REPORT
ON
WILDER FOR PRESIDENT COMMITTEE
EXECUTIVE SUMMARY**

Wilder for President Committee (the Committee) registered with the Federal Election Commission as Wilder for President Exploratory Committee on March 27, 1991. The Committee was the principal campaign committee of Governor Douglas Wilder, a candidate for the 1992 Democratic presidential nomination.

The audit was conducted pursuant to 26 U.S.C. §9038(a), which requires the Commission to audit committees that receive Federal funds. The Committee received \$289,027 in matching funds from the U.S. Treasury.

The findings of the audit were presented to the Committee at an exit conference held on August 11, 1992 and in the interim audit report approved by the Commission on May 25, 1993. The Committee was given an opportunity to respond to the findings both after the exit conference and after receipt of the interim audit report. These responses have been included in the findings set forth in this report.

In the final audit report, the Commission made an initial determination that the Committee repay the U.S. Treasury a total of \$31,058 in connection with the receipt of matching funds in excess of the candidate's entitlement, and the payment of non-qualified campaign expenses. In addition, the Commission determined that a payment to the U.S. Treasury of \$9,184 is required in connection with the Committee's receipt of prohibited contributions from corporate entities and excessive contributions from individuals.

The following is an overview of the findings contained in the final audit report.

Apparent Non-qualified Campaign Expenses - 26 U.S.C. §9032(9) and 11 C.F.R. §9038.2(b)(2). The Committee did not provide documentation to resolve \$42,224 in non-qualified campaign expenses. In the final audit report the Commission made an initial determination that the Committee repay \$12,026, the pro-rata amount, to the U.S. Treasury.

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Executive Summary
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Matching Funds Received in Excess of Entitlement - 26 U.S.C. §9038(b)(1). The Commission made an initial determination that the Committee repay \$19,032 to the U.S. Treasury. This determination was based on an analysis of the Committee's Statement of Net Outstanding Campaign Obligations and relevant receipts activity, which showed that the candidate had received \$19,032 in matching funds in excess of the amount to which he was entitled.

Transactions Involving Commonwealth of Virginia - 11 C.F.R. §9034.7(a), 11 C.F.R. §9034.7(b), 11 C.F.R. §§100.7(a)(1)(iii)(A) and (B). The Commission determined that the Committee had to pay \$30,848 to the Commonwealth of Virginia. Of that amount, \$27,977 represented the difference between the lowest unrestricted and non-discounted first class air fare and the amount actually paid by the Committee for the use of Commonwealth aircraft. An additional \$2,871 in phone services also had to be reimbursed to the Commonwealth.

Apparent Prohibited and Excessive Contributions - 2 U.S.C. §441a(a)(1)(A) and 2 U.S.C. §441b(a). The Committee must pay \$9,184 to the U.S. Treasury, representing the value of unresolved corporate contributions and unresolved excessive contributions from individuals. Counsel for the Committee challenged the Commission's authority to require such payments. The Commission did not find the Committee's arguments persuasive.

Use of Corporate Aircraft - 11 CFR §114.9(e). The interim report had recommended that, absent a demonstration to the contrary, the Committee make a \$6,318 payment to the U.S. Treasury, the amount representing an apparent underpayment for the use of corporate aircraft. In response, the Committee provided documentation from the corporations which reduced the underpayment to an insignificant amount.

Misstatement of Financial Activity - 2 U.S.C. §§434(b)(1), (2), and (4). On its disclosure reports, as initially filed, for the period January 1, 1991, through April 30, 1992, the Committee misstated its financial activity. The Committee filed amended reports which corrected the misstatements.



REPORT OF THE AUDIT DIVISION
ON THE
WILDER FOR PRESIDENT COMMITTEE

I. Background

A. Audit Authority

This report is based on the audit of the Wilder for President Committee (the Committee). The audit is mandated by Section 9038(a) of Title 26 of the United States Code. That section states that "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." Also Section 9039(b) of the United States Code and Section 9038.1(a)(2) of the Commission's Regulations state that the Commission may conduct other examinations and audits from time to time as it deems necessary.

In addition to examining the receipt and use of Federal funds, the audit seeks to determine if the campaign has materially complied with the limitations, prohibitions and disclosure requirements of the Federal Election Campaign Act of 1971, as amended.

B. Audit Coverage

The audit covered the period from the Committee's inception, January 1991, through April 30, 1992. During this period, the Committee reported an opening cash balance of \$ -0-, total receipts of \$802,058, total disbursements of \$646,931 and a closing cash balance on April 30, 1992 of \$155,127. In addition, a limited review of the Committee's transactions was conducted through August 12, 1993, for purposes of determining the Committee's remaining matching fund entitlement based on its financial position.

C. Campaign Organization

The Committee registered with the Federal Election Commission on March 27, 1991 as Wilder for President Exploratory

Committee. An amended Statement of Organization was filed on September 27, 1991 changing the name to the Wilder for President Committee. The Treasurer of the Committee during the period covered by the audit was Mark R. Warner. The current Treasurer is Mark R. Warner.

During the period audited, the campaign established an office in New Hampshire in addition to its national headquarters located in Fairfax, VA (initially located in Alexandria, Virginia). The Committee's current offices are located in Washington, D.C.

To handle its financial activity, the campaign used one bank account. The Committee made approximately 546 disbursements. Approximately 2,741 contributions were received from 2,669 persons. These contributions totaled approximately \$532,000.

In addition to contributions, the campaign received \$289,027 in matching funds from the United States Treasury. This represents approximately 2% of the \$13,810,000 maximum entitlement that any candidate could receive. The candidate was determined eligible to receive matching funds on November 27, 1991. To date, the campaign has made a total of two matching fund requests totaling \$297,252. The Commission has certified 97.2% of the requested amount. For matching fund purposes, the Commission determined that Governor Wilder's candidacy ended January 8, 1992. This determination was based on a public statement made by the candidate. The campaign received one matching fund payment after January 8, 1992, based on the financial condition presented in the Committee's Statement of Net Outstanding Campaign Obligations (see Finding III.A.).

Attachment 1 to this report is a copy of the Commission's most recent Report on Financial Activity for this campaign. The amounts shown are as reported to the Commission by the campaign.

D. Audit Scope and Procedures

In addition to a review of the qualified and non-qualified campaign expenses incurred by the campaign (see Finding III.C.), the audit covered the following general categories:

1. The receipt of contributions or loans in excess of the statutory limitations (see Finding II.A.);
2. the receipt of contributions from prohibited sources, such as those from corporations or labor organizations (see Finding II.B.);
3. proper disclosure of contributions from individuals, political committees and other entities, to include the itemization of

contributions when required, as well as, the completeness and accuracy of the information disclosed;

4. proper disclosure of disbursements including the itemization of disbursements when required, as well as, the completeness and accuracy of the information disclosed;
5. proper disclosure of campaign debts and obligations;
6. the accuracy of total reported receipts, disbursements and cash balances as compared to campaign bank records (see Finding II.C.);
7. adequate recordkeeping for campaign transactions (see Finding II.D.);
8. accuracy of the Statement of Net Outstanding Campaign Obligations filed by the campaign to disclose its financial condition and establish continuing matching fund entitlement (see Findings III.A. and D.);
9. the campaign's compliance with spending limitations; and
10. other audit procedures that were deemed necessary in the situation.

In addition, on April 21, 1992, the Audit staff conducted an inventory of the Committee's records to determine if they were materially complete and in an auditable condition. A letter dated May 5, 1992, notified the Committee that records pertaining to several areas of the pending audit were not made available for review. Furthermore, the letter informed the Committee that if at the conclusion of a 30 day period ending June 8, 1992, the items listed on the letter had not been provided, the Commission would issue subpoenas for the production of those records. Records provided in response to our May 5, 1992 request were deemed sufficient to commence fieldwork.

At the entrance conference on June 12, 1992, the Audit staff informed the Committee that a request would be made to the Office of General Counsel for subpoenas to be issued to the Treasurer of Virginia, for the production of detailed invoices related to all payments made to the Treasurer of Virginia (see Attachment 5) by the Committee and records relating to all amounts

still owed to the Treasurer of Virginia; and to its direct mail vendor for the production of all mail code definitions associated with direct mailings.1/

The subpoena to the Treasurer of Virginia, Eddie N. Moore, Jr., was approved by the Commission on July 7, 1992, and delivered on July 10, 1992. In Mr. Moore's response, dated July 29, 1992, he stated that he did not have in his possession any of the subpoenaed documents.

On the 21st and 24th of July 1992, the Audit staff delivered written requests to the Committee for two missing contributor checks and detailed documentation supporting a \$1,000 credit card transaction at the Jefferson Hotel. The Committee was afforded 10 working days to respond. Despite positive assurances, no documentation was provided for review and the subpoena process was initiated by the Audit staff on August 11, 1992.

In a memorandum dated August 24, 1992, the Office of General Counsel recommended that the subpoena previously issued to the Treasurer of Virginia be redirected to the Commonwealth of Virginia and Governor Wilder as its agent. The redirected subpoena would contain a more detailed request for documentation which should aid the Commonwealth in locating the documents.

In addition, the August 24th memorandum requested approval of two additional subpoenas; the first to Nations Bank to produce the two contributor checks deposited by the Committee^{2/}, and the second to the Jefferson Hotel for the production of the credit card documentation mentioned above.^{3/}

The Commission approved the subpoenas on August 28, 1992.

The following is a chronology of events that occurred subsequent to the Commission's action of August 28, 1992.

November 19 and 20, 1992 - the Audit Division received documentation, submitted by the Committee through the Office of General Counsel, relevant to reimbursements for use of the Governor's office telephones and a state employee's salary.

1/ The mail code definitions were provided by the Committee on June 18, 1992, and the subpoena was not issued to the direct mail vendor.

2/ The contributor checks were provided by the Committee on August 25, 1992, and the subpoena to Nations Bank was not issued.

3/ A response from the Jefferson Hotel was received by the Commission on October 1, 1992.

November 24, 1992 - the Audit Division notified the Counsel's office that salary documentation was sufficient, however, the documentation for the telephone payment was incomplete.

December 15, 1992 - the Commission approved the filing of a civil suit for subpoena enforcement. Prior to such filing, the Commission granted the Committee 10 days to produce the requested documentation.

December 21, 1992 - the Committee made available additional documentation which supplemented its previous submission with respect to use of phones, as well as documentation which supported certain credit card charges.

January 8, 1993 - the Committee made available, for the first time, official flight logs for use of the State of Virginia airplane.

Documentation received in response to the various subpoenas was determined to be materially complete.

Unless specifically discussed below, no material non-compliance was detected. It should be noted that the Commission may pursue further any of the matters discussed in this report in an enforcement action.

II. Findings and Recommendations - Non-repayment Matters

Introduction to Findings

In light of an October 22, 1993 decision by the Court of Appeals for the D.C. Circuit in FEC v. NRA Political Victory Fund, et al., the Commission reconsidered the interim audit report and voted for its approval on November 9, 1993. As a result of this action, the Committee was afforded an additional 30 days to supplement its earlier response received on August 12, 1993. On December 13, 1993, a supplemental response to the interim audit report was received which, along with the earlier response, was considered when this report was prepared.

A. Apparent Excessive Contributions

Section 441a(a)(1)(A) of Title 2 of the United States Code states that no person shall make contributions to any candidate and his authorized political committees with respect to any election for Federal office which, in the aggregate, exceed \$1,000.

Section 103.3(b)(3) of Title 11 of the Code of Federal Regulations states, in part, that contributions which on their face exceed the contribution limitations set forth in 11 CFR 110.1 and contributions which do not appear to be excessive on their face, but which exceed the contribution limit set forth in

11 CFR 110.1 when aggregated with other contributions from the same contributor may be either deposited into a campaign depository under 11 CFR 103.3(a) or returned to the contributor. If any such contribution is deposited, the treasurer may request reattribution of the contribution by the contributor in accordance with 11 CFR 110.1(k). If reattribution is not obtained, the treasurer shall, within sixty days of the treasurer's receipt of the contribution, refund the contribution to the contributor.

Section 110.1(k)(3) of Title 11 of the Code of Federal Regulations states, in part, that if a contribution to a candidate or political committee, either on its face or when aggregated with other contributions from the same contributor, exceeds the limitation on contributions set forth in 11 CFR 110.1(b), the treasurer of the recipient political committee may ask the contributor whether the contribution was intended to be a joint contribution by more than one person.

A contribution shall be considered to be reattributed to another contributor if within sixty days from the date of the treasurer's receipt of the contribution, the contributors provide the treasurer with a written reattribution of the contribution, which is signed by each contributor, and which indicates the amount to be attributed to each contributor if equal attribution is not intended.

Finally, Sections 110.1(l)(3) and (5) of Title 11 of the Code of Federal Regulations state, in part, that if a political committee receives a written reattribution of a contribution to a different contributor, the treasurer shall retain the written reattribution signed by each contributor as required by 11 CFR 110.1(k). If a political committee does not retain the written records concerning reattribution, the reattribution shall not be effective and the original attribution shall control.

The Commission notified the Committee by letter dated June 2, 1992, that a sampling technique would be used to identify the dollar amount of excessive contributions received by the Committee. The letter states, in part, Commission regulations provide 60 days in which to seek reattribution, redesignation or refund of excessive contributions (see 11 CFR 103.3(b)(1) and (2)). The Commission will no longer recognize any untimely refunds, redesignations or reattributions made more than 60 days following a candidate's date of ineligibility or after the date of receipt of this letter, whichever is later. Excessive contributions resolved by the committees outside these time periods will not be considered mitigated violations. The Committee received the letter June 8, 1992.

The Audit staff's review of contributions received from individuals identified \$5,200 in excessive contributions involving five contributors (see Attachment 2). As of August 11, 1992 (date of exit conference), the Audit staff determined that no refunds or reattributions were made regarding these excessive contributions.

The Committee did not establish a separate account for handling possible excessive contributions; however, the amount of cash maintained on a monthly basis by the Committee in its bank account was greater than the cumulative total of the excessive contributions deposited (see 11 CFR §103.3(b)(4)).

At the exit conference the Audit staff presented the Committee with a schedule of the apparent excessive contributions. The Committee official acknowledged the receipt of the schedule and stated that Committee personnel would review the apparent errors and attempt to resolve the situation as deemed necessary.

In the interim audit report, the Audit staff recommended that the Committee either:

- ° demonstrate that the contributions discussed above are not excessive; or
- ° make a payment to the United States Treasury in the amount of \$5,200, representing the total dollar value of the unresolved excessive contributions.

In response to the interim audit report Counsel for the Committee states:

The Committee disputes the Audit Division's recommendation that it make payment to the United States Treasury for any excessive contribution.

Counsel further states that assuming arguendo that the Committee did accept excessive contributions, the Committee challenges the Commission's authority to require payment of unresolved excessive contributions to the United States Treasury. Contributions deemed excessive are not subject to the repayment provisions of the Presidential Primary Matching Fund regulations. In fact, in a letter to the Committee dated June 2, 1992, the Commission apparently recognizes that it is without the legal authority to require campaign committees to make such payments to the United States Treasury, noting that it will request that unresolved contributions be paid to the United States Treasury.

To the extent that the Committee may have inadvertently accepted excessive contributions, the Committee should be permitted to refund such contributions to

the respective contributors, with the expressed understanding that any such refunds will be recognized as documented, qualified campaign expenses by the Commission.

Finally, the Committee requests that the Audit Division recommendation that the Committee pay to the United States Treasury \$5,200, representing the total dollar value of the unresolved excessive contributions be deleted.

The Committee has not complied with the above stated recommendation. Arguments submitted questioning the Commission's authority to require a payment are not persuasive; therefore, a payment (\$5,200) to the United States Treasury is warranted. Further, the Audit staff has recognized this recommended payment as a qualified campaign expense, and as such, included this amount on the NOCO statement (see Finding III.A.). Finally, should the Committee make refunds to these contributors, the amount will not be considered a qualified campaign expense.

Recommendation #1

The Audit Division recommends that the Commission determine that the Committee make a payment in the amount of \$5,200 to the United States Treasury.

B. Apparent Prohibited Contributions

Section 441b(a) of Title 2 of the United States Code states, in part, that it is unlawful for any national bank or any corporation organized by authority of any law of Congress to make a contribution or expenditure in connection with any election to any political office or for any corporation whatever, or labor organization, to make a contribution or expenditure in connection with any election to federal office and that it is unlawful for any candidate, political committee or any other person to knowingly accept or receive any contribution prohibited by this section.

The Commission notified the Committee by letter dated June 2, 1992, that a sampling technique would be used to identify the dollar amount of prohibited contributions received by the Committee. The letter states, in part, Commission regulations provide 30 days in which to refund contributions which appear to be prohibited (see 11 CFR 103.3(b)(1) and (2)). The Commission will no longer recognize any untimely refunds made more than 60 days following a candidate's date of ineligibility or after the date of the receipt of this letter, whichever is later. Prohibited contributions resolved by the committees outside these time periods will not be considered mitigated violations. The Committee received the letter June 8, 1992.

The Audit staff reviewed contributions received from individuals on a sample basis. Our review identified three apparent prohibited contributions, involving three contributors, totaling \$1,500 (see Attachment 3). The sample projected that the total dollar value of unresolved prohibited contributions in the population was \$3,984. As of August 11, 1992 (date of exit conference), the Audit staff determined that no refunds were made regarding these prohibited contributions.

The Committee did not establish a separate account for handling possible prohibited contributions; however, the amount of ending cash on hand reported by the Committee on its monthly disclosure reports was greater than the cumulative total of the prohibited contributions deposited (see 11 CFR §103.3(b)(4)).

At the exit conference the Audit staff presented the Committee with a schedule of apparent prohibited contributions. The Committee acknowledged receipt of the schedule and stated that personnel would review the apparent errors and attempt to resolve the situation as deemed necessary.

In the interim audit report, the Audit staff recommended that the Committee either:

- ° demonstrate that the contributions discussed above are not prohibited; or
- ° make a payment to the United States Treasury in the amount of \$3,984, representing the projected dollar amount the unresolved prohibited contributions.

In response to the interim audit report Counsel for the Committee states:

The Committee disputes the Audit Division's recommendation that it make payment to the United States Treasury for any prohibited contribution.

Counsel further states that assuming arguendo that the Committee did accept prohibited contributions, the Committee challenges the Commission's authority to require payment of unresolved prohibited contributions to the United States Treasury. Contributions deemed prohibited are not subject to the repayment provisions of the Presidential Primary Matching Fund regulations. In fact, in a letter to the Committee dated June 2, 1992, the Commission apparently recognizes that it is without the legal authority to require campaign committees

to make such payments to the United States Treasury, noting that it will request that unresolved prohibited contributions be paid to the United States Treasury.

To the extent that the Committee may have inadvertently accepted prohibited contributions, the Committee should be permitted to refund such contributions to the respective contributors, with the expressed understanding that any such refunds will be recognized as documented, qualified campaign expenses by the Committee. The Committee requests that the Audit Division recommendation that the Committee pay to the United States Treasury \$3,984, representing the total dollar value of the unresolved prohibited contributions be deleted.

Finally, the Committee states,

"The Audit Division's preliminary finding identifies unresolved excessive contributions in the amount of \$5,200.00. The Interim Audit notes that the \$5,200.00 represent[s] the total dollar value of the unresolved excessive contributions. In order to reach this conclusion, the Audit Division obviously reviewed all the contributions received by the Committee. This examination should have enabled the Audit Division to make a preliminary determination regarding the total dollar value of any unresolved prohibited contributions as well. Instead, for some unexplained reason, the Audit Division identified several unresolved prohibited contributions and used a sampling method to project a dollar amount representing unresolved prohibited contributions. After having examined all the contributions, there is no rationale for the Audit Division utilizing a sampling method to project prohibited contributions instead of calculating the total dollar amount. It is the position of the Committee that if the Audit is to contain amounts representing unresolved prohibited contributions, the Audit Division, having already reviewed all the contributions, should be required to

present a total dollar amount and not a projected amount."

It should be noted that the Audit staff did not review all contributions on a 100% basis. Two separate reviews were performed to determine the amount of excessive contributions (see Finding II.A.). Certain contributions were tested on a sample basis, while other contributions were tested on a 100% basis. Conversely, a sample review was performed to project the value of prohibited contributions received by the Committee. The Committee's position is incorrect.

The Committee has not complied with the above stated recommendation. Arguments submitted questioning the Commission's authority to require a payment are not persuasive; therefore, a payment (\$3,984) to the United States Treasury is warranted. Further, the Audit staff has recognized this recommended payment as a qualified campaign expense, and as such, included this payment on the NOCO statement (see Finding III.A.). Finally, should the Committee make refunds to these contributors, the amount will not be considered a qualified campaign expense.

Recommendation #2

The Audit Division recommends that the Commission determine that the Committee make a payment in the amount of \$3,984 to the United States Treasury.

C. Misstatement of Financial Activity

Sections 434(b)(1), (2) and (4) of Title 2 of the United States Code state, in relevant part, that each report shall disclose the amount of cash on hand at the beginning of the reporting period and the total amount of all receipts and disbursements during the reporting period and the calendar year.

The Audit staff's reconciliation of the Committee's reported activity to its bank activity for the period January 1, 1991 through April 30, 1992, revealed the following misstatements:

1. Receipts

The Committee's reported receipts of \$802,058 were understated by a net amount of \$19,557.

The understatement of receipts was the net result of unreported receipts totaling \$23,106; understated unitemized receipts of \$326; contributor checks returned for "non sufficient funds" totaling \$2,850 for which no adjustment was made to reported receipts; overstated receipts from individuals totaling \$775; and an unexplained reconciling item of \$250.

2. Disbursements

The Committee's reported disbursements of \$646,931 were understated by a net amount of \$5,157.

The understatement of disbursements was a net result of unreported disbursements totaling \$4,543 and miscellaneous reporting errors totaling \$614.

3. Ending Balance

The Committee's reported ending cash balance at April 30, 1992 of \$155,127 was understated by \$14,400, a net result of the receipt and disbursements misstatements noted above. The correct ending cash balance at April 30, 1992 was \$169,527.

At the exit conference the Audit staff presented the Committee with schedules that detailed the components of the receipts and disbursements misstatements. The Committee stated that amended reports were in the process of being prepared and that a response to the misstatements will be submitted in a timely manner.^{4/}

In the interim audit report, the Audit staff recommended that the Committee file amended reports to correct the misstatements discussed above.

On August 12, 1993, the Committee filed amended disclosure reports that materially corrected the reporting problems noted.

D. Transactions Involving Commonwealth of Virginia

Introduction

During calendar years 1991 and 1992, the Committee was invoiced by the Office of the Governor, Commonwealth of Virginia (the Commonwealth) for goods/services provided, including the use of (1) an airplane and a helicopter^{5/}, (2) telephones, (3) credit card, and (4) labor and equipment/facilities. The Commonwealth billed approximately \$70,730 and received payment.

^{4/} The Committee submitted an amendment to its July monthly report which corrected a portion of the misstatement noted for disbursements.

^{5/} The use of the helicopter was provided by the Virginia Department of State Police.

1. Use of the Airplane and Helicopter

Section 9034.7(a) of Title 11 of the Code of Federal Regulations states that notwithstanding the provisions of 11 CFR part 106, expenditures for travel relating to the campaign of a candidate seeking nomination for election to the office of President by any individual, including a candidate, shall, pursuant to the provisions of 11 CFR 9034.7(b), be qualified campaign expenses and be reported by the candidate's authorized committee(s) as expenditures.

Section 9034.7(b)(1) through (5) of Title 11 of the Code of Federal Regulations states for a trip which is entirely campaign-related, the total cost of the trip shall be a qualified campaign expense and a reportable expenditure.

For a trip which includes campaign-related and non-campaign related stops, that portion of the cost of the trip allocable to campaign activity shall be a qualified campaign expense and a reportable expenditure. Such portion shall be determined by calculating what the trip would have cost from the point of origin of the trip to the first campaign-related stop and from that stop through each subsequent campaign-related stop, back to the point of origin. If any campaign activity, other than incidental contacts, is conducted at a stop, that stop shall be considered campaign related.

For each trip, an itinerary shall be prepared and such itinerary shall be made available for Commission inspection.

For trips by government conveyance or by charter, a list of all passengers on such trip, along with a designation of which passengers are and which are not campaign-related, shall be made available for Commission inspection.

If any individual, including a candidate, uses government conveyance or accommodations paid for by a government entity for campaign-related travel, the candidate's authorized committee shall pay the appropriate government entity an amount equal to the first class commercial air fare plus the cost of other services, in the case of travel to a city served by a regularly scheduled commercial service; or the commercial charter rate plus the cost of other services, in the case of travel to a city not served by a regularly scheduled commercial service.

Also, 11 C.F.R. §§100.7(a)(1)(iii)(A) and (B) define the term "anything of value" (referring to contribution) to include all in-kind contributions. Unless specifically exempted under 11 CFR 100.7(b), the provision of any goods or services without charge or at a charge which is less than the usual and normal charge for such goods or services is a contribution. Examples of such goods or services include, but are not limited to: securities, facilities, equipment, supplies, personnel,

advertising services, membership lists, and mailing lists. If goods or services are provided at less than the usual and normal charge, the amount of the in-kind contribution is the difference between the usual and normal charge for the goods or services at the time of the contribution and the amount charged the political committee. For purposes of 11 CFR 100.7(a)(1)(iii)(A), "usual and normal charge" for goods means the price of those goods in the market from which they ordinarily would have been purchased at the time of the contribution; and usual and normal charge for any services, other than those provided by an unpaid volunteer, means the hourly or piecework charge for the services at a commercially reasonable rate prevailing at the time the services were rendered.

The candidate, frequently accompanied by staff and media personnel, made campaign trips on the Commonwealth's airplane, a Cessna Model S550. The Committee was billed at a rate of \$625 per flight hour plus pilots' expenses, landing fees, etc. Virtually all flight destinations were cities served by regularly scheduled commercial service. Thus, in accordance with 11 C.F.R. §9034.7(b)(5), the Committee was required to reimburse the Commonwealth the first class commercial airfare plus the cost of other services.

As discussed at Section I.D., written requests and subpoenas were issued in an effort to obtain all records related to usage of the airplane and the helicopter. All records requested had not been received as of October 28, 1992.

The Committee did however provide (1) invoices which were annotated to include the identification of the passengers who apparently were on the airplane (in at least one instance, one passenger was not listed for a trip), (2) a typed flight itinerary (3) photocopies of billings issued by the Committee to the media, and (4) photocopies of reimbursement checks received. Records related to the computation of the amounts billed by the Commonwealth, the formal passenger manifest, and a complete accounting of all campaign related trips (in whole or in part) had not been provided by the Commonwealth.

As previously stated, on December 15, 1992, the Commission authorized the Office of General Counsel to file a civil suit against the Commonwealth for subpoena enforcement. Prior to filing, the Commonwealth was granted ten days to comply with the subpoena. The Audit staff received, from the Office of General Counsel, the Commonwealth's response on January 8, 1993. Included in the response were copies of flight log information for use of the Commonwealth's plane, despite repeated allegations that the documents responsive to the subpoena had been previously forwarded to the Audit staff as part of the presidential audit process and/or did not exist.

The Audit staff analyzed the information in hand in an effort to determine if the \$625 per hour charge equated to first class airfare. Based on our analysis of 54 trip legs (17

complete trips), the Commonwealth "underbilled" the Committee by approximately \$25,847. Further, the Audit staff identified two campaign-related trips (November 20, 1991 and December 4, 1991) for which no flight logs were made available for review.

In the interim audit report, the Audit staff recommended that the Committee:

- ° provide flight log information generated by the Commonwealth for campaign-related trips on the two dates noted above;
- ° demonstrate that the Commonwealth did not underbill the Committee in the amount of \$25,847; or
- ° make a payment to the Commonwealth in the amount of \$25,847.

Further recommendations will be forthcoming.

In response to the interim audit report, Counsel for the Committee disputes the Audit Division's recommendation that it make a payment to the Commonwealth of Virginia for the amount determined to be underbilled.

Counsel states, in relevant part, that:

"the Committee used the Commonwealth of Virginia's plane for campaign-related travel on several occasions. As required by the Commonwealth, Wilder for President reimbursed the Commonwealth of Virginia at the rate of \$625.00 per hour of plane use plus pilot and miscellaneous expenses. Due to a conflict between federal and state methods for calculating reimbursements in connection with the use of Commonwealth aircraft, the Audit Division preliminarily concluded that the Committee must pay the Commonwealth of Virginia an additional \$25,847.04 for the use of the state plane. The Committee disputes the Audit Division's position that the Committee pay the Commonwealth of Virginia an additional \$25,847.04. The Audit Division's underlying analysis and calculations are flawed. Therefore, the alleged repayable amount of \$25,847.04 pursuant to federal regulations is erroneous for various reasons.

The Committee disputes the Audit Division's payment amount of \$25,847.04 based upon its use of the General Services Administration first-class airfare. The Audit Division used General Services Administration's first class

airfare as the standard first class airfare to determine the cost per leg. The Regulations do not dictate that first class airfare be based on GSA's determination of first class airfare. The Regulations only require that payment be made to the appropriate government entity in the amount equal to the commercial first class airfare. In fact, there is no standard first class airfare. On any given day, different travel agencies and airlines might provide various first-class commercial airfares. Accordingly, there were most likely other first-class airfares lower than GSA's first class airfare for each particular flight. Therefore, because the first-class airfares that the Audit Division used were not determinative first-class airfares, the alleged repayable amount is highly questionable.

In addition, the Committee strongly objects to the Audit Division's inclusion of the costs of flights which contained no campaign-related passengers. The Audit Division erroneously included in its calculations the costs of flights which are not subject to payment by the Committee under the Regulations. The Audit Division included in its calculations flights which contained only the pilot and no campaign-related passengers..(sic) In these instances, the state plane was sent from Richmond to another city to pick-up Governor Wilder or returned from another city to Richmond without any campaign-related staff..(sic) However, such flight is not a reimbursable flight pursuant to the Regulations because the flight did not contain any campaign-related passengers. The Regulations at 11 C.F.R. 9034.7 clearly state that 'if any individual, including a candidate, uses government conveyance or accommodations paid for by a government entity..' then the candidate'(sic) committee must pay the appropriate government entity an amount equal to the first class commercial airfare plus the cost of other services.' The language 'any individual' clearly does not include the pilot or crew of a plane. In the instant cases, these were the only individuals present on the plane.

In analogous situations, the Audit Division does not require payment for flights like these. For example, when a committee uses

corporate aircraft, a committee is not required to pay the corporation for the return flight to its origin if the plane is not carrying any campaign-related staff. Similarly, the Committee in the instant cases is not required under federal law to reimburse the government entity for flights which do not contain any individuals on campaign-related business. The Committee reimbursed the Commonwealth of Virginia for such flights pursuant to state policy. However, simply because the Committee makes an expenditure in connection with a state requirement does not permit the FEC to include such flights in its calculations when such flights clearly are not subject to the federal election law. The Audit Division would like to ignore the Committee's state reimbursement method in connection with campaign-related travel in all other instances. Yet in this instance it would like to adopt state policy when state policy requires reimbursement and federal election law requires none. The FEC cannot selectively apply different standards for its own benefit. Most importantly, regardless of state policy, the Regulations, as well as past Commission practice, prohibit the Commission from requiring payment for the costs of such flights. Accordingly, the following flights should not be included in the FEC's \$25,874.04 (sic) figure: (sic)

7/14/91	JFK to Richmond, VA**	\$384.00
7/21/91	Richmond, VA to JFK**	\$384.00
7/27/93(sic)	Richmond, VA to Washington, D.C.	\$325.00
10/19/91	Richmond, VA to San Antonio, TX	\$826.00
11/08/91	Richmond, VA to Washington, D.C.	\$325.00

** This leg of the flight was not campaign-related. Specifically, the July 14, 1991 New York/Richmond leg was not campaign-related. Neither the Governor, nor any other campaign-related staff returned on the plane to Richmond. Governor Wilder went on to his vacation. Similarly, the Richmond-JFK leg on July 21, 1991 was not campaign-related. The plane was sent to New York to pick-up the Governor. By including these two legs, the Audit Division is in direct contradiction to the Regulations and the Audit Division's practice, including non-campaign-related flights.

The Interim Audit Report also inaccurately stated that the Committee failed to provide certain flight information to the FEC. The Committee strongly disagrees with this statement. The Committee continually forwarded all records in its possession relating to use of the Commonwealth plane to the Commission. The Committee was unable to provide the Commission with documents which were not in its possession. The Committee never asserted that the Commonwealth did not possess information related to the use of the Commonwealth plane. The Committee stated only that the Committee did not possess such information and, therefore, was unable to forward that information to the FEC.

The Audit Division also requested copies of flight logs for November 20, 1991 and December 4, 1991. Flight logs for November 20, 1991 and December 4, 1991 were included in documents previously provided to the Audit Division." (Emphasis in original).

It should be noted that the airfare information, provided by General Services Administration, is selected by utilizing the date of the trip. The date is entered into its computer program^{6/} which selects and prints the available airfares for those carriers providing first class commercial service on the date of the trip. The Audit staff selected the lowest unrestricted and non-discounted first class airfare. Counsel's argument that the airfares selected are "not determinative first-class airfares" is, in the opinion of the Audit staff, not persuasive. The Committee did not submit any documentation in support of its argument. Counsel merely states, "there were most likely other first-class airfares lower than GSA's first class airfare for each particular flight."

It should be noted that when the regulation concerning the use of corporate aircraft was adopted in 1976, prior to the deregulation of the airline industry, there was little price variation between carriers for a given trip. Subsequently, in February 1983 a similar regulation concerning the candidate's use of government conveyance was adopted.

^{6/} Passenger Interline Pricing, Prorate System compiled by the Airline Tariff Publishing Company based at Dulles International Airport

The Committee is suggesting that a lower (discounted) first class airfare should be used rather than the lowest non-discounted and unrestricted first class airfare.^{7/} It is the opinion of the Audit staff that the Committee's position is not a reasonable interpretation of the intent of the regulation given that the service provided is not subject to the pre-established routes and schedules of commercial carriers.

In the interim audit report, the Audit staff charged an equivalent of one first-class airfare in instances where the Commonwealth's plane traveled, without passengers, to/from a campaign-related event. Counsel's argument that the Committee reimbursed the Commonwealth for the these flights pursuant to state policy and such expenditures do "not permit the FEC to include such flights in its calculations when such flights clearly are not subject to federal election law" is incorrect. In accordance with 11 C.F.R. 9034.7(a), any expenditures made for travel relating to the campaign of a candidate seeking nomination for election to the office of President, shall, pursuant to the provisions of 11 C.F.R. 9034.7(b), be qualified expenses and be reported by the candidate's authorized committee(s). Thus, the flights, corresponding reimbursements, and all supporting documentation are subject to federal election law and, accordingly, were reviewed by the Audit staff.

Nonetheless, the Audit staff has removed the five legs in question from its analysis for various reasons, which reduced the amount underbilled from \$25,847 (interim audit report) to \$25,414 (see Attachment 4).

The Audit staff determined that the July 14, 1991 and July 21, 1991 trips (Richmond to New York to Richmond) were not campaign-related. See discussion at Finding III.C.4..

The July 27, 1991 and November 8, 1991 legs (Richmond to Washington, D.C.) were flights by the Commonwealth's plane (empty) to provide the Governor with transportation back to Richmond or onto another campaign-related event. The Audit staff determined that the difference between the amount reimbursed by the Committee and the correct billable amount calculated by the Audit staff is minimal. Therefore, the legs and associated costs were removed from our analysis.

^{7/} The airfare information provided by General Services Administration Transportation Audit Division contains first class airfares with no accompanying provisions and/or conditions (code F). It also contains lower first class airfares for night travel (code FN), and other discounted and/or restricted service (code F9, F28, etc.).

The Richmond to San Antonio leg on October 19, 1991 was also removed from our analysis. In this instance the Governor was in San Antonio, TX for a campaign-related event. The Commonwealth's plane traveled (empty) from Richmond to San Antonio to provide transportation for the Governor and other campaign-related individuals back to Richmond. However, according to Counsel, the state policy requires the Committee to reimburse the state for the initial leg (Richmond to San Antonio). The flight log provided by the Commonwealth indicates 4.1 flight hours recorded for this leg, therefore, the Committee should have reimbursed the Commonwealth for \$2,563 (4.1 hours x \$625 per hour). There was no evidence of a billing by the Commonwealth nor a reimbursement by the Committee.

As a result, the Committee must reimburse the Commonwealth \$2,563.

As stated above, the Audit staff's requests for documentation were routinely delayed throughout the audit process. See discussion at Section I.D. It should be noted that the Committee never asserted that the "official flight logs" were not in the possession of the Commonwealth. However, Counsel for the Committee did state that an "itinerary" and "manifest" did not exist.

Further, Counsel argues that the flight logs for November 20, 1991 and December 4, 1991 were included in documents previously provided to the Audit Division. The Commonwealth's submission of flight logs on January 8, 1993 did not include these flight logs. The flight logs were received by the Audit staff in the Committee's response dated December 13, 1993.

The Committee has not complied with the above stated recommendation. Therefore, it remains the opinion of the Audit staff that the Committee should be required to reimburse the Commonwealth of Virginia \$27,977 (\$25,414 + \$2,563).

Recommendation #3

The Audit Division recommends that the Commission determine that the Committee reimburse the Commonwealth of Virginia \$27,977.

2. Telephone and Credit Card Usage

The Committee paid the Treasurer of Virginia \$5,000 for use of the Governor's office phone lines, and \$4,853 for reimbursement of travel expenses charged on a credit card. The only information provided related to the phone reimbursement was an invoice from the Office of the Governor, dated December 31, 1991, with the following description "Use of Governor's Office phone lines by Wilder for President campaign." No photocopies of

phone bills or other documents were made available to show when the calls were made, the charges for the calls and the itemization of campaign vs. non campaign-related calls.

A Committee representative stated that the Governor did not wish to make available the telephone numbers called.

On November 20, 1992, the Audit Division received, from the Office of General Counsel, the Committee's supplemental response to the subpoenas. The response included a typed worksheet that recaps categories of cost (i.e., Monthly Recurring Charges, Scats, Toll Calls, Other Charges, and Message Units/Extended Area). The amounts contained on the worksheets are supported by copies of monthly "Commonwealth of Virginia - Interagency Transfer Invoice for Telephone Service", which detail the same categories of cost that appear on the worksheets.

The Committee uses the average cost of scats, toll calls, other charges, and message units/extended area for a 4 month period (August 28, 1991 through December 28, 1991) it considers the "campaign period" and compares it to the average cost of similar charges for a 6 month period (January 28, 1991 through July 27, 1991) which precedes the "campaign period". The Committee then takes the average increase of each category, multiplies it by 4, and arrives at the cost the Committee should reimburse the Commonwealth, for use of phones.

The calculation is deficient for a number of reasons:

- billing information for the period July 28, 1991 through August 27, 1991 is missing, and not used in the Committee's analysis.
- billing information for the period December 29, 1991 through January 27, 1992 is missing, and not used in the Committee's analysis.
- the Committee considers the "campaign period" to be August 28, 1991 to December 28, 1991. However, the Candidate's exploratory committee registered in March 1991 and the campaign ended in January 1992 (the Candidate's DOI is 1/8/92). Further, an apparent one time charge ("other charges" September 1991 at \$2,535) could be a direct charge to the Committee because it appears to be for some increased level of activity, possibly additional telephone lines.
- the Committee did not include in its analysis any charge or average charge for the cost of the "Monthly Recurring Charges", which under its analysis would increase the amount due the Commonwealth of Virginia by approximately \$1,200.

- the Committee did not include in its analysis any charge or average charge for Federal, State, or local taxes normally associated with monthly telephone cost.

The Committee submitted additional documentation on December 21, 1992. Specifically, the Committee submitted typed worksheets and copies of monthly "Commonwealth of Virginia - Interagency Transfer Invoice for Telephone Service", that support its worksheets, for the period April 1990 through February 1992. However, the Committee has revised its previous calculation (of \$5,104) and determined that the amount owed the Commonwealth for use of its telephones was \$3,345. The Committee calculated the average cost of scats, toll calls, other charges, and message units/extended area for the four month period and compared it the average cost of similar charges for the preceding 17 months and the subsequent 3 months following the "campaign period". It is the opinion of the Audit staff that the revised calculation is even less representative of the actual cost of campaign related telephone usage than its previous calculation. As a result, the Audit staff will not consider the revised calculation in the discussion that follows. Further, the Committee has also stated that telephone bills itemizing long distance calls were not (and at this stage cannot be) annotated as to whether a particular call was campaign related or official business of the Governor.

Absent the itemized phone bills, the Audit staff has analyzed the charges noted on the interagency transfer invoices for an 11 month period beginning March 1991 through January 1992, versus the same charges for the preceding 11 months (April 1990 through February 1991). According to the documentation made available, the cost of the Governor's office telephones for the 11 month period from April 1990 through February 1991 totaled \$49,373. The cost of telephones for the 11 month period during which the Candidate's campaign was active totaled \$57,244, an increase of \$7,871.

The difference between the amount calculated by the Audit staff (\$7,871) and the amount initially calculated by the Committee (\$5,104) is as follows:

- the Audit staff compared all costs noted on the interagency transfer invoices, where as the Committee did not include the "Monthly Recurring Charges".
- the Audit staff considered the relevant period to be March 1991 through January 1992, the Committee considered the "campaign period" to be September 1991 through December 1991.
- the Audit staff compared costs incurred during the 11 month active campaign period to costs incurred during the preceding 11 months. The Committee compared costs

incurred during a 4 month period to costs incurred during a 6 month period which precedes, but not sequentially, its four month "campaign period".

It is our opinion that, based on the documentation made available, the Audit staff's calculation reasonably reflects the amount of campaign-related usage of the Commonwealth's telephones. However, the interagency transfer invoices do not include the cost of Surcharges on equipment, Federal excise taxes, and local taxes, which are normally associated with telephone bills and, if incurred, should be prorated between the Committee and the Governor's office.

On January 15, 1992, the Committee reimbursed the Treasurer of Virginia \$4,853 for its use of the Governor's credit card, a "Visa Business Card". In support of the payment the Committee submitted a schedule of 8 charges totaling \$2,693, a page from the December 1991 (closing date) billing statement, and receipts for 7 of the charges totaling \$2,321. Documentation for credit card charges totaling \$2,532 (\$4,853 - 2,321) has not been made available.

As a result, the undocumented portion, \$2,532, of the above payment is considered a non-qualified campaign expense (see Finding III.C.3.).

In the interim audit report, the Audit staff recommended that the Committee:

- ° with respect to the use of telephones, make a payment to the Commonwealth of \$2,871 (\$7,871 - 5,000) plus an amount that represents the increase in surcharges on equipment, federal excise taxes, and local taxes for the periods noted above; documentation to show the additional costs and the Committee's calculations are to be provided to the Audit staff; and
- ° with respect to the use of the credit card, provide documentation to support the \$2,532 in apparent credit card charges.

The Committee did not address these matters in its response to the interim audit report. It remains the opinion of the Audit staff that the Committee should be required to reimburse the Commonwealth of Virginia \$2,871 for use of telephones and provide documentation which identifies the costs of surcharges on equipment, Federal excise taxes, local taxes, and any other costs for the period April 1990 through January 1992; the undocumented credit card payment of \$2,532 represents a non-qualified campaign expense (see Finding III.C.3. for disposition).

Recommendation #4

The Audit Division recommends that the Commission determine that the Committee reimburse the Commonwealth of Virginia \$2,871.

3. Campaign-Related Services of Governor's Press Secretary

The Committee by check dated January 15, 1992, paid the Commonwealth \$7,795, which according to information made available represented reimbursement for the services of the Governor's Press Secretary during the last quarter of calendar year 1991. According to a photocopy of an undated, unsigned document entitled "Glenn Davidson Worksheet," reimbursement was requested for 1/3 of Mr. Davidson's salary and benefits paid by the Commonwealth for the three month period. According to the worksheet, 1/3 of his time was "campaign" [related] and 2/3 was "State" [not campaign-related]. No information was made available with which to verify the various amounts listed or the time spent on the campaign.

On November 12, 1992, the Committee submitted documentation from the Commonwealth which details Glenn K. Davidson's 1991 salary plus the value of fringe benefits. In addition, Mr. Davidson submitted a signed statement, on Commonwealth letterhead, dated November 3, 1992, that states:

"I did not maintain any records regarding what percentage of my daily activities were campaign-related versus the percentage of time that was strictly in connection with State business (as I was not required to do so). However, to the best of my judgment and recollection, two-thirds of my work-related time was spent on State business, and the remaining one-third was campaign-related."

In the interim audit report, the Audit staff recommended no further action on this matter.

E. Use of Corporate Aircraft

Section 114.9(e) of Title 11 of the Code of Federal Regulations states, in part, that a candidate, candidate's agent or person traveling on behalf of a candidate who uses an airplane which is owned or leased by a corporation, other than a corporation licensed to offer commercial services, for travel in connection with a Federal election must, in advance, reimburse the corporation - in the case of travel to a city served by regularly scheduled commercial service, the first class air fare; in the case of travel to a city not served by regularly scheduled commercial service, the usual charter rate.

On three separate occasions, aircraft owned by corporations were used for campaign-related travel. The Audit staff reviewed the documentation made available by the Committee

and identified three payments to three corporations totaling \$3,768. It must be noted that the Audit staff was unable to determine the actual amount billed to the Committee, since no corporate invoices were made available for review.

Notwithstanding the above, the Audit staff attempted to analyze the information in hand and determine whether the activity was conducted in accordance with 11 CFR 114.9(e). All three flight destinations were to cities served by regularly scheduled commercial service. Thus, in accordance with 11 CFR 114.9(e), the Committee was required to reimburse, in advance, the first class commercial airfare plus the cost of other services.

The Audit staff utilized airfares obtained from the General Services Administration Transportation Audit Division. The fares represent the lowest non-discounted and unrestricted first class rates available on the dates of the flights. Based on the Audit staff's analysis of six trip legs (three complete trips) identified, the respective reimbursements made by the Committee appear to be \$6,318 less than the required reimbursement amount.

The first class rate used by the Committee to calculate the reimburseable amount appears to be understated. Further, the Committee did not include several passengers in their calculation of the reimburseable amount.^{8/} Information available did not provide any indication as to whether these passengers were traveling on campaign related or non-campaign related business. In the absence of documentation to the contrary, the Audit staff has included the cost of these individuals' travel as campaign-related.

In the interim report, the Audit staff recommended that the Committee provide the following:

- ° invoices generated by the corporations which detail, with supporting documentation, the amount billed to the Committee;
- ° information generated by the corporations which lists the passengers on each aircraft and an annotation by the Committee or the Corporations, as appropriate, which details whether the passengers were considered as traveling on official or campaign-related business and the basis for such determination;
- ° demonstrate that this activity is in accordance with 11 CFR 114.9(e); or

^{8/} The documentation made available during the fieldwork referred to a certain number of passengers on each flight. However, the same documentation submitted 10 days subsequent to the exit conference was annotated with names of additional passengers on each flight.

- ° make a payment to the United States Treasury in the amount of \$6,318.

The Committee submitted documentation which included letters and flight logs from two corporations and a letter from the third corporation which identified each leg of the flight and the passengers aboard. The Committee also submitted a memorandum from its National Scheduling Director which described steps taken by the Committee to obtain the first class airfares used.

The Committee's response states, in part,

"Neither the FEC's regulations nor the FEC Financial Control and Compliance Manual for Presidential Primary Candidates Receiving Public Financing, (January 1992 edition), require, or even suggest, that campaign committees obtain first-class airfares from a particular source such as the General Services Administration. In each of the instances under review by the Audit Division, the Committee used due diligence in obtaining first-class fares from a reputable travel agency. Since the figures used by the Committee are actual legitimate first-class fares, the Audit Division should apply these fares in determining whether there was any under payment. 2/ Nothing obligates the Committee to use anything but the lowest first-class airfare applicable." [footnote omitted]

Based on our review of the documentation generated by the corporations, the Audit staff was able to identify all passengers traveling on the corporate aircraft. Consequently, the Committee's cost was recalculated; the amount now viewed as underbilled is \$1,614.

The Committee's contention that the lowest first class airfare may be used is, in the opinion of the Audit staff, contrary to the regulation's intent.

This regulation, adopted in 1976, set the standard - the [singular] first class airfare is to be used as a basis to determine the amount reimbursed.9/ First class was selected apparently in an attempt to equate a non-scheduled corporate aircraft trip to that of a scheduled commercial flight with the same origin and destination points.

9/ Generally, there was little price variation between carriers for a given trip prior to the deregulation of the airline industry.

The Committee is suggesting that a lower (discounted) first class airfare should be used rather than the lowest non-discounted and unrestricted first class airfare.^{10/} It is the opinion of the Audit staff that the Committee's position is not a reasonable interpretation of the intent of the regulation given that the service provided is not subject to the pre-established routes and schedules of commercial carriers.

Nevertheless, since the identified level of this type of activity was minimal and the calculated "underpayment" (\$1,641) is insignificant when compared to total campaign activity, the Audit staff believes further action is not warranted.

III. Findings and Recommendations - Repayment Matters

A. Determination of Net Outstanding Campaign Obligations

Section 9034.5(a) of Title 11 of the Code of Federal Regulations requires that within 15 calendar days after the candidate's date of ineligibility, the candidate shall submit a statement of net outstanding campaign obligations which contains, among other items, the total of all outstanding obligations for qualified campaign expenses and an estimate of necessary winding down costs. Subsection (b) of this section states that the total of outstanding campaign obligations shall not include any accounts payable for non-qualified campaign expenses.

In addition, 11 C.F.R. §9034.1(b) states, in part, that if on the date of ineligibility a candidate has net outstanding campaign obligations as defined under 11 CFR 9034.5, that candidate may continue to receive matching payments provided that on the date of payment there are remaining net outstanding campaign obligations.

Governor Wilder's date of ineligibility was January 8, 1992, the date on which he concluded his campaign to seek the Democratic nomination. The Audit staff reviewed the Committee's financial activity through 8/12/93, analyzed estimates of winding down costs prepared by the Committee through 8/12/94 and developed the figures shown below.

^{10/} The airfare information provided by General Services Administration Transportation Audit Division contains first class airfares with no accompanying provisions and/or conditions (code F). It also contains lower first class airfares for night travel (code FN), and other discounted and/or restricted service (code F9, F28, etc.).

Audit Analysis of Wilder for President Committee
NOCO Statement, as of 1/8/92

ASSETS

Cash in Bank	\$336,977	
Accounts Receivable	19,448	
Capital Assets	<u>15,452</u>	a/
 Total Assets		 \$371,877

LIABILITIES

Accounts Payable for		
Qualified Campaign Expenses	\$249,268	b/
Amount Due the Commonwealth of VA	<u>30,848</u>	
Winding Down Cost		
1-9-92/8-12-94		
Salaries/Consulting Fee	60,880	c/
(including pre-ineligibility commitments)		
Fundraising Costs	1,257	
Legal Fees & Expenses	87,027	d/
Rent	<u>4,988</u>	
Administrative Costs (phone, supplies, furniture rental, etc.)	1,324	
Accounting Fees	640	
Amounts Due U.S. Treasury	<u>9,084</u>	e/
 Total Liabilities		 <u>445,316</u>
 Deficit		 <u>\$ (73,439)</u> f/

Notes to NOCO Statement Analysis

- a/ This figure represents the value of a lease buyout of \$6,938 (paid on January 29, 1992) and prepaid lease payments for the period January 11, 1992 through April 11, 1992 totaling \$8,513. The total of these two values does not foot to the NOCO statement due to rounding.
- b/ This figure represents \$134,669 of the \$225,759 shown by the Committee; \$91,090 is excluded due to lack of adequate supporting documentation. Also included is \$106,753 in additional qualified accounts payable developed by the Audit staff based on our review of payments made 1/9/92-6/30/92. In response to the interim audit report the Committee provided documentation for expenses totaling \$7,846. Should the Committee provide adequate documentation, the accounts payable figure will be adjusted accordingly.
- c/ This figure represents: (1) cases where the actual amounts paid to certain individuals were less than estimated amounts to be paid (\$12,725); (2) a case where the estimate (\$22,000) for one individual was later reduced by agreement between the parties; (3) the exclusion of \$17,300 in payments with the stated purpose "Severance" (see Finding III.C.1.); and (4) an overstatement of estimated January payroll (<\$3,702>). In response to the interim audit report the Committee provided documentation for additional payroll expenses totaling \$4,068.
- d/ The Audit staff used actual expenses incurred, and an estimate (\$12,000) of legal expenses necessary to wind down the campaign.
- e/ See Findings II.A. (Excessive Contributions - \$5,100 [\$5,200 - \$100 excessive contribution received after 1/8/92]) and II.B. (Prohibited Contributions - \$3,984).
- f/ The calculated deficit of \$73,439 is based on certain estimates. Also, approximately \$49,000 in expenses were excluded from the NOCO by the Audit staff due to insufficient documentation (see Attachment 6). Should the Committee provide adequate documentation for any portion of the above amount, the deficit would increase.

B. Calculation of Repayment Ratio

Section 9038(b)(2)(A) of Title 26 of the United States Code states that if the Commission determines that any amount of any payment made to a candidate from the matching fund payment account was used for any purpose other than to defray the qualified campaign expenses with respect to which such payment was made it shall notify such candidate of the amount so used, and the candidate shall pay to the Secretary an amount equal to such amount.

Section 9038.1(c)(1)(v) of Title 11 of the Code of Federal Regulations states, in part, that the Commission will issue an interim audit report to the candidate and his authorized committee. The interim audit report may contain Commission findings and recommendations regarding preliminary calculations with respect to future repayments to the United States Treasury.

Section 9038.2(a)(2) of Title 11 of the Code of Federal Regulations states the Commission will notify the candidate of any repayment determination made under this section as soon as possible, but not later than 3 years after the end of the matching payment period. The Commission's issuance of an interim audit report to the candidate under 11 CFR 9038.1(c) will constitute notification for purposes of the 3 year period.

Section 9038.2(b)(2)(iii) of Title 11 of the Code of Federal Regulations states that the amount of any repayment sought under this section shall bear the same ratio to the total amount determined to have been used for non-qualified campaign expenses as the amount of matching funds certified to the candidate bears to the total amount of deposits of contributions and matching funds, as of the candidate's date of ineligibility.

Pursuant to 11 C.F.R. §9033.5(a), the Commission determined Governor Wilder's date of ineligibility to be January 8, 1992.

The formula and the appropriate calculation with respect to the Committee's receipt activity is as follows:

$$\frac{\text{Total Matching Funds Certified Through} \\ \text{The Date of Ineligibility - January 8, 1992}}{\text{Numerator Plus Total Deposits Through Date of Ineligibility}}$$

$$\frac{\$198,315}{\$198,315 + \$497,969} = .284819$$

Thus, the repayment ratio for non-qualified campaign expenses is 28.4819%.

C. Apparent Non-Qualified Campaign Expenses

Section 9032(9) of Title 26 of the United States Code defines, in part, the term "qualified campaign expense" as a purchase or payment incurred by a candidate, or by his authorized committee made in connection with his campaign for nomination which neither the incurring of nor payment of constitutes a violation of any law of the United States or of the state in which the expense is incurred or paid.

Section 9038.2(b)(2) of Title 11 of the Code of Federal Regulations states, in relevant part, that the Commission may determine that amounts of any payments made to a candidate from the matching payment account were used for purposes other than to defray qualified campaign expenses. The amount of any repayment under this section shall bear the same ratio to the total amount determined to have been used for non-qualified campaign expenses as the amount of matching funds certified to the candidate bears to total deposits, as of the candidates date of ineligibility.

1. Severance Payments Made by the Committee

The Committee paid \$15,300 in severance to 11 individuals on January 29 and 30, 1992 (see Attachment 7). No employment agreements or other documentation was made available with respect to these payments other than the checks themselves and a typed list of payments prepared by the Committee. Five of the individuals continued to receive compensation through June 1992, approximately four months after receiving the severance payments. Generally, the amount of severance paid was approximately equal to one month's compensation.^{11/}

In response to the interim audit report Counsel for the Committee states, in part:

"Immediately following the January 8th announcement, the Committee had to decide how to staff -- both for the short-term and long-term -- its necessary close-down activities and its FEC audit/compliance operations. The short-term activities promised to be particularly time-consuming and delicate -- since prior to January 8th, the Committee was actively expanding, not contracting, its operations and commitments. Among other decisions, the Committee decided to compensate the twelve consultants noted by

^{11/} Two individuals received their first compensation in January 1992; three in December 1991; one in November; three in October; one in August, and one in April.

the Audit Division.^{2/} [the Committee named twelve individuals in its footnote, deleted by Audit staff]

Counsel further states,

"During the last few weeks of January, 1992, the Committee approached certain of the referenced consultants regarding working with the Committee on a regular basis, starting February 1, 1992, in connection with the Committee's close-down and FEC audit/compliance matters."

It is the opinion of the Audit staff that the Committee's response does not demonstrate that severance payments should be considered qualified campaign expenses. Facts known to date, contradict arguments made by the Committee and render others irrelevant.

For example, the Committee states that six of the consultants began working again (emphasis added) with the Committee on a regular basis. It should be noted that payroll records indicate that the six named consultants experienced no breaks in service, no breaks in compensation, and, in fact, received extra compensation via the severance payments while employment continued, in four cases, through June, 1992.

The Committee further states "While there are no written documents that set forth the details of these arrangements, post 2/1/92 compensation payments to these individuals previously have been recognized as 'qualified campaign expenses' by the Audit Division."

The Committee is correct in stating post 2/1/92 compensation payments to certain individuals have been recognized as qualified campaign expenses. However, such recognition does not render severance payments, to the individuals in question, to be qualified campaign expenses.

2. Questionable Salary Payments

Ruth M. Jones (Governor's personal secretary/Office Manager) and William M. Keough, Jr. (Office of the Governor - Deputy Director of Constituent Affairs) each of whom were assistants to the Treasurer of the Committee received \$10,000 and \$5,000 respectively on January 29, 1992. According to the list of payments prepared by the Committee, the "duration" [of work] for both Ms. Jones and Mr. Keough was "April [sic] 1, 1991 through present" [January 31, 1992.] Ms. Jones also received a \$4,000 payment, dated 5/29/92 identified as consulting fees. Ms. Jones, during the period September 1991 - January 21, 1992 received \$2,400 in compensation from the Committee. According to the Committee, she reviewed invoices and prepared checks for the

Treasurer's signature. Mr. Keough received no prior compensation from the Committee. No information was made available as to the specific duties he performed. A Committee representative stated that the Commission has previously allowed presidential committees to pay severance.

With respect to both the \$15,300 in severance payments and the \$15,000 paid to Ms. Jones (\$10,000) and Mr. Keough (\$5,000), it is the Audit staff's opinion that, based on the information provided to date, these expenses are non-qualified campaign expenses.

With respect to the \$10,000 payment to Ms. Jones, the Committee submitted a memorandum from Ms. Jones to Ms. Kerman (Counsel for the Committee). The memorandum is dated August 11, 1993 and states, in part, the following:

"I (Ms. Jones) have served as a consultant to the Committee from approximately April 1, 1991 through the present, with significant responsibilities regarding managing the Committee's funds, paying the Committee's bills, FEC compliance matters, and the Committee's day-to-day financial affairs... Moreover, I worked with the Committee on a host of other projects ranging from fundraising activities to political events."

The memorandum also states "I charged the Committee \$16,300 for my services covering the period from approximately April 1, 1991 through May 31, 1992 (an approximately 14-month period). I have not billed the Committee for the numerous hours I have spent working on close-down matters from June 1, 1992 through the present (approximately 14 1/2 months)."

It should be noted that Ms. Jones did not charge nor bill the Committee \$16,300 (actually \$16,400) for her services. Specifically, Ms. Jones was paid consulting fees totaling \$2,400 during the period September 1, 1991 through January 21, 1992. Subsequently she billed the Committee \$4,000. According to the bill, Ms. Jones charged the Committee "for services rendered - February 1992 through May 1992." The Committee paid this bill on May 29, 1992. Documentation bears out that this individual was paid for services rendered from September 1991 through May, 1992 and never charged/billed the Committee \$10,000. Finally, the \$10,000 paid by the Committee on January 29, 1992, simply does not fit into the compensation payments to Ms. Jones.

With respect to the \$5,000 payment the Committee submitted a memorandum from William Keough. The memorandum, similar to the memorandum received from Ms. Jones, details various services performed between April 1, 1991 through the present. Mr. Keough also states he accepted \$5,000 for services performed through the end of January 1992.

It should be noted that the Committee classified this payment as "accounting services" necessary to wind down the campaign. As such, this amount was included by the Committee on its NOCO statement.^{12/} It appears that the Committee is now attempting to reclassify this payment as an accounts payable for qualified campaign expenses, for services rendered during the active phase of the campaign as opposed to its original disclosure as a wind down expense. It is the opinion of the Audit staff that such documentation, received after the fact and contradictory to the Committee's initial classification is not credible nor representative of a qualified campaign expense. Further, Mr. Keough never billed the Committee.

3. Undocumented Disbursements

Finally, the Committee made 11 payments, totaling \$11,582, to individuals/vendors. The necessary supporting documentation for these expenses was not made available for review. As a result, the Audit staff was unable to determine whether the expenses were campaign-related and accordingly, the disbursements were considered non-qualified campaign expenses.

The Committee submitted documentation that demonstrates three payments, totaling \$1,257 (\$400 + \$400 + \$457), were, in fact, campaign-related. In addition, the Committee stated that a \$500 payment to a vendor was never issued. Prior to issuing this check, Committee officials determined that no outstanding balance was owed the vendor and accordingly the check was destroyed.

Further, with respect to two payments, totaling \$3,500, associated with Governor Wilder's birthday celebration on January 17, 1992 (candidate's date of ineligibility is January 8, 1992) the Committee stated the following:

"Both these disbursements were in connection with a Committee event of January 17, 1992 at the Jefferson Hotel that was scheduled and organized prior to Governor Wilder's unexpected termination of his candidacy on the evening of January 8, 1992 (a draft version of the invitation to the January 17, 1992 event, along with the Committee's final changes thereto is attached). Thus, the Governor's termination announcement came only nine days

^{12/} The Committee estimated \$15,000 in accounting expenses necessary to wind down the campaign (Ruth Jones \$10,000 - William Keough \$5,000).

before the January 17th event, and after a large number of individuals had been invited, and in many instances purchased a ticket(s) to the event.

Under the circumstances, the Committee decided, on or about January 9, 1992, that the most reasonable thing to do was to go forward with the event it had already committed to hold -- but to halt the solicitation of further contributions with respect to the event, and to recharacterize the previously-scheduled fundraiser as also a thank you party for those who worked and volunteered on the campaign.

It should be noted that, in previous audits of presidential campaigns, the Audit Division has expressly classified post-ineligibility thank you parties for campaign staff and volunteers as legitimate winding down expenses and thus qualified campaign expenses (See Audit of 1988 Paul Simon for President Committee, disbursements in connection with December 9, 1988 holiday thank you parties for campaign staff and volunteers -- in particular, disbursement(s) to the Sheraton Washington Hotel in Washington, D.C.)."

Counsel for the Committee states that the event was a "previously-scheduled fundraiser" and that the solicitation of contributions was halted subsequent to the Governor's termination announcement on January 8, 1992. Our review indicates that the Committee did not establish a fundraising code nor designate any contributions as being received as a result of this event.

The Committee noted that post-ineligibility disbursements for "thank you parties for campaign staff and volunteers" by the Simon for President Committee have been classified, by the Audit staff, as qualified campaign expenses.

The Audit staff reviewed the Simon for President workpapers relating to the disbursement in question. The respective documentation does not identify the event as a "thank you party for campaign staff and volunteers". It does, however, indicate that a Christmas party had taken place. This disbursement was not questioned by the Audit staff; however, it remains the Audit staff's opinion that the Committee has not provided documentation to demonstrate that the \$3,500 in identified expenses related to the Governor's birthday celebration represent qualified campaign expenses. No documentation was presented for the remaining five payments totaling \$6,325.

On April 21, 1994, the Commission considered this matter. Based on the Committee's response and documentation submitted, the Commission determined that the event was campaign-related and the associated expenditures were qualified campaign expenses.

Finally, the Committee submitted documentation with respect to Finding III.D. which resulted in an increase in remaining entitlement as of the date of ineligibility. However, as a result, the period during which matching funds were in Committee accounts was extended from February 12, 1992 to March 3, 1992. During this period, the Audit staff identified two additional non-qualified campaign expenses totaling \$2,814.

4. Use of State Plane

As noted in Finding II.D.1. (Transactions Involving Commonwealth of Virginia), the candidate made campaign trips on the Commonwealth's airplane. The Commonwealth normally billed at a rate of \$625 per flight hour plus pilots' expenses, landing fees, etc. The Audit staff originally included in its analysis a flight from Richmond, VA to New York, NY to Richmond, VA on July 14, 1991 and a similar flight (Richmond to New York to Richmond) on July 21, 1991.

In response to Finding II.D.1., Counsel for the Committee argues, in relevant part, that the return flight from New York to Richmond on July 14, 1991 and the flight from Richmond to New York on July 21, 1991 are not campaign related. Counsel further states:

"Neither the Governor, nor any other campaign-related staff returned on the plane to Richmond. Governor Wilder went on to his vacation. Similarly, the Richmond - JFK leg on July 21, 1991 was not campaign-related. The plane was sent to New York to pick-up the Governor. By including these two legs, the Audit Division is in direct contradiction to the Regulations and the Audit Division's practice, including non-campaign-related flights."

It should be noted that the Committee paid \$1,385 for the July 14, 1991 trip and \$1,400 for the July 21, 1991 trip. According to a newspaper article in The Washington Post on July 26, 1991 entitled, "VA. Flew Wilder to N.Y. - Governor to Repay the State \$2,689", Governor Wilder flew from Richmond to New York on July 14, 1991 and then to Switzerland via a commercial flight. The state plane returned to New York on July 21, 1991 to pick up Governor Wilder for the return trip to

Richmond. The Governor's Press Secretary Laura Dillard is quoted as saying "The state will bear no expense for the governor's vacation." A similar article in the August 1, 1991 edition of The Washington Times states Governor Wilder has said he will pay back the state the \$2,700 cost.

As stated, Counsel for the Committee believes the New York to Richmond flight on July 14, 1991 and the Richmond to New York flight on July 21, 1991 should not be included in the analysis since neither flight represents a campaign-related trip.

Based on the above the Audit staff agrees with Counsel. However, it is our opinion that since the return trip (New York to Richmond) on July 14, 1991 is not campaign-related and the apparent purpose of the initial leg (Richmond to New York) was to transport Governor Wilder to New York for a connecting commercial flight to Switzerland for a vacation, then the entire trip (Richmond to New York to Richmond) is not campaign-related.

With respect to the July 21, 1991 trip, it is our opinion that the first leg (Richmond to New York) is not campaign-related and the apparent sole purpose of the return leg (New York to Richmond) was to transport the Governor back to Richmond, therefore, the entire trip (Richmond to New York to Richmond) is not campaign-related as well.

Absent evidence to the contrary, it is the opinion of the Audit staff that the trips on July 14 and 21 (1991) are not campaign-related and the costs [\$2,785 (\$1,385 and 1,400)] of such trips represent non-qualified campaign expenses.

In summary, eight payments totaling \$11,924 are viewed as non-qualified campaign expenses, repayable to the United States Treasury (see Attachment 8).

Recommendation #5

The Audit Division recommends that the Commission make an initial determination that the Committee make a pro-rata repayment of \$12,026 [$\$42,224 (15,300 + 15,000 + 9,139 + 2,785) \times .284819$] to the United States Treasury.

D. Matching Funds Received in Excess of Entitlement

Section 9038(b)(1) of Title 26 of the United States Code states 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 an amount equal to the amount of excess payments.

Section 9034.1(b) of Title 11 of the Code of Federal Regulations states if on the date of ineligibility a candidate has net outstanding campaign obligations as defined under 11 CFR §9034.5, that candidate may continue to receive matching payments for matchable contributions received and deposited on or before December 31 of the Presidential election year provided that on the date of payment there are remaining net outstanding campaign obligations, i.e., the sum of the contributions received on or after the date of ineligibility plus matching funds received on or after the date of ineligibility is less than the candidate's net outstanding campaign obligations. This entitlement will be equal to the lesser of: (1) the amount of contributions submitted for matching; or (2) the remaining net outstanding campaign obligations.

Based on our analysis of the NOCO statement filed by the Committee, it appears that the candidate was in a deficit position (<\$73,439) on his date of ineligibility. After applying private contributions received during the period 1/9/92 through 2/4/92, the Candidate was entitled to \$71,679 of the \$90,711 matching fund payment received on 2/4/92.

Therefore, the Candidate received \$19,032 in excess of the amount to which he was entitled.

Recommendation #6

The Audit Division recommends that the Commission make an initial determination that the Committee was not entitled to \$19,032 in matching funds received on February 4, 1992 pursuant to 11 C.F.R. §9038.2(b)(1)(i), and that the Committee repay \$19,032 to the United States Treasury pursuant to 26 U.S.C. §9038(b)(1).

E. Recap of Amounts due the United States Treasury

1.	Payment for Excessive Contributions (Finding II.A.)	\$ 5,200
2.	Payment for Prohibited Contributions (Finding II.B.)	3,984
3.	Apparent Non-Qualified Campaign Expenses (Finding III.C.)	12,026
4.	Matching Funds Received in Excess of Entitlement (Finding III.D.)	19,032
	Total Amount Due	<u>\$40,242</u>

Adjusted Receipts
(Through December 31, 1993)

	Federal Matching Funds	Individual Contributions Minus Refunds	PAC's and Other Comite Carib Minus Refunds	Contributions from the Candidate	Candidate Loans Minus Repayments	Other Loans Minus Repayments	Other Receipts	Adjusted Total Receipts
Democratic								
Larry Agon	\$799,891	\$771,671	\$0	\$500	\$5,000	\$1,079	\$2,893	\$810,844
Jerry Brown	\$4,276,345	\$5,176,336	\$0	\$0	\$0	\$0	\$4,893	\$9,420,374
Tim Clinton	\$12,516,130	\$24,883,688	\$2,429	\$0	\$0	\$1	\$14,365	\$37,516,833
Tom Harlin	\$2,103,352	\$3,090,208	\$418,570	\$0	\$0	\$0	\$14,293	\$5,613,421
Rob Herrey	\$2,198,284	\$3,813,332	\$348,767	\$0	\$0	(\$1,228)	\$5,831	\$8,468,078
Lyndon LaRouche	\$0	\$1,603,015	\$0	\$0	\$0	\$0	\$21	\$1,603,036
Paul Teague	\$3,039,388	\$5,056,820	\$3,568	\$0	\$45,000	(\$9,575)	\$0	\$8,134,999
Doug Wilder	\$269,076	\$508,518	\$750	\$0	\$0	\$0	\$1,078	\$799,334
Total Democrats	\$24,957,216	\$44,663,347	\$772,072	\$500	\$60,000	(\$9,770)	\$43,365	\$70,199,720
Republicans								
Patrick Buchanan	\$4,999,881	\$7,157,808	\$24,750	\$0	\$0	\$0	\$21,115	\$12,203,654
George Bush	\$10,656,511	\$27,088,825	\$44,250	\$0	\$0	\$0	\$722,308	\$38,013,894
David Duke	\$0	\$220,715	\$0	\$0	\$1,000	\$0	\$0	\$271,815
Total Republicans	\$15,656,496	\$34,467,348	\$69,000	\$0	\$1,000	\$0	\$243,421	\$50,489,398
Other Party								
Andre Marrou	\$0	\$582,770	\$181	\$116	\$15,000	\$0	\$0	\$578,067
Lenora Fulard	\$1,935,524	\$2,201,577	\$0	\$325	(\$1,258)	\$1,200	\$0	\$4,137,309
Total Other Party	\$1,935,524	\$2,784,347	\$181	\$441	\$13,742	\$1,200	\$0	\$4,715,425
Grand Total	\$47,251,236	\$81,885,042	\$841,253	\$841	\$84,742	(\$8,570)	\$769,776	\$128,371,520

Adjusted Disbursements
(Through December 31 1993)

	(Operating Expenditures Minus (Offsets	Fundraising Minus (Offsets	Legal/Accounting Minus (Offsets	Other Disburse	Adjusted Total Disbursements	Expenditures Subject to Limit	Unexpended On Hand	Debits Owing By the Campaign
DEMOCRATS								
Larry Agan	\$808,718	\$0	\$0	\$85	\$808,813	\$813,830	\$2,432	\$5,170
Jerry Brown	\$8,308,453	\$2,278,938	\$272,823	\$108,584	\$8,968,808	\$8,888,482	\$188,118	\$0
Bill Clinton	\$25,488,176	\$5,524,000	\$2,858,177	\$0	\$33,870,353	\$25,508,976	\$1,252,783	\$84,713
Tom Hayden	\$4,003,103	\$1,144,008	\$188,833	\$0	\$5,345,742	\$3,128,315	\$215,818	\$153,714
Rob Kerry	\$5,181,458	\$1,078,878	\$178,811	\$23,404	\$6,461,751	\$6,050,481	\$9,882	\$0
Lyndon LaRouche	\$1,523,524	\$0	\$85,140	\$0	\$1,608,664	\$1,483,218	\$3,223	\$27,183
Paul Leungas	\$8,778,010	\$754,878	\$188,780	\$0	\$9,721,778	\$7,001,568	\$28,181	\$187,472
Long White	\$788,380	\$8,588	\$38	\$0	\$806,997	\$789,861	\$8,183	\$0
Total Democrats	\$50,888,872	\$10,785,488	\$3,783,313	\$132,883	\$65,367,866	\$51,280,727	\$1,708,478	\$438,252
REPUBLICANS								
Patrick Buchanan	\$11,827,811	\$0	\$0	\$0	\$11,827,811	\$11,827,813	\$885,287	\$0
George Bush	\$27,427,061	\$5,628,322	\$4,881,473	\$70,318	\$37,908,188	\$27,427,065	\$48,118	\$18,814
David Duke	\$353,838	\$0	\$0	\$1,000	\$354,838	\$0	\$0	\$28,250
Total Republicans	\$39,608,700	\$5,526,322	\$4,881,473	\$71,318	\$49,997,814	\$38,054,888	\$714,403	\$48,864
Other Party								
Andre Marrou	\$415,578	\$180,218	\$0	\$0	\$575,795	\$0	\$0	\$0
Lamar Liden	\$4,203,822	\$0	\$0	\$3,235	\$4,208,857	\$4,204,555	\$2,970	\$0
Total Other Party	\$4,619,400	\$180,218	\$0	\$3,235	\$4,782,852	\$4,204,555	\$2,970	\$0
Total	\$94,884,720	\$18,472,008	\$8,674,786	\$208,837	\$120,640,152	\$84,540,150	\$2,423,852	\$487,116

Wilder for President Committee
Schedule of Apparent Excessive Contributions

Contributor	Date of Deposit	Amount of Contribution	Total Contribution	Amount Excessive
1. Thomas J. Berenguer 646 S. Atlantic Ave. Virginia Beach, VA 23451	15-Apr-91	\$1,000	\$4,000	\$3,000
	15-Apr-91	\$1,000		
	15-Apr-91	\$1,000		
	15-Apr-91	\$1,000		
2. Mary Freeman Cheek 4703 Pocahontas Ave. Richmond, VA 23226	30-Sep-91	\$1,000	\$1,100	\$100
	10-Dec-91	\$100		
3. Reginald C. Jackson, MD P.O. Box 26084 Richmond, VA 23260	11-Nov-91	\$1,000	\$2,000	\$1,000
	05-Dec-91	\$1,000		
4. H.B. Mack 370 W. Passaic ST Rochelle Park, NJ 07662	13-Dec-91	\$2,000	\$2,000	\$1,000
5. Lawrence D. Wilder, Jr. 2509 E. Broad ST Richmond, VA 23223	13-Nov-91	\$500	\$1,100	\$100
	20-Dec-91	\$500		
	12-Feb-92	\$100		
----- Total:				\$5,200 -----

Wilder for President Committee
Sample Exceptions - Apparent Prohibited Contributions

Contributor	Date of Incorporation	Check Date	Amount
1. Asprey 726 Fifth Avenue New York, New York 10022	07-May-91	05-Nov-91	\$250
2. J.Kopf CMA Enterprises LTD 304 Park Avenue South New York, New York 10010	23-Oct-79	20-Nov-91	\$1,000
3. Lindley T. Smith, MD, PC Ophamology Second & Franklin ST, Ste 102 Richmond, VA 23219	01-Feb-80	ILLEGIBLE	\$250
Total:			\$1,500

MEMORANDUM FOR RESIDENTS COMMITTEE
 RE: MEMBERSHIP'S USE OF COMPROMISE PLAN
 (Measurements to Commonwealth of Virginia
 compared to first class airfare for trip)

FAR

(1) Date of Trip	(2) Depart/Arrive	(3) # of Passengers (8)	(4) Pilot's expenses (F2)	(5) Other expenses (F4)	(6) Total (F4)	(7) Total flight hours	(8) Leg cost (cl. 8 X \$625/hr) (F5)	(9) Amount billed to Committee	(10) Other expenses (9)+(10)	(11) Invoice Total	(12) Inches See CR/1.b	(13) Cost of Charter per leg (F6)	(14) Cost of Charter per leg (F6)	(15) No. of Staff, Press, & Other	(16) Total Class Cost per leg (10)+(16)	(17) Total Class Cost (Sum of leg totals)	(18) Total Class Cost (Sum of leg totals)	(19) Amt. VA under-billed (18)-(12)
01-May-91	1. Richmond VA to Des Moines IA	2	2			4	2.5 \$1,625.00	\$136.80		\$136.80		\$674.00	\$674.00	2	\$1,348.00	\$674.00	\$674.00	(\$627.08)
04-May-91	2. Des Moines IA to Richmond VA	2	2			5	2.1 \$1,312.50	\$61.20	\$3,323.08	\$3,323.08	4	\$340.00	\$340.00	2	\$680.00	\$680.00	\$680.00	
	Pilot's expenses																	
	Outstaring for passengers																	
05-May-91	3. Richmond VA to Cleveland OH	2	2			4	1.3 \$812.50	\$93.75	\$906.25	\$906.25		\$666.00	\$666.00	3	\$1,998.00	\$1,998.00	\$1,998.00	
	Pilot's expenses (one day)																	
06-May-91	4. Cleveland OH to Oklahoma City OK (PWA)	3	3			6	3 \$1,875.00	\$93.75	\$2,022.75	\$2,022.75		\$793.00	\$793.00	3	\$2,379.00	\$2,379.00	\$2,379.00	\$409.61
	Pilot's expenses (one day)																	
07-May-91	5. Oklahoma City OK (PWA) to Richmond VA	3	3			7	2.6 \$1,625.00	\$93.75	\$1,718.75	\$1,718.75	5	\$184.00 (A)	\$184.00 (A)	2	\$368.00	\$368.00	\$368.00	\$348.50
	Outstaring for passengers																	
	Pilot's expenses (one day)																	
11-Jun-91	6. Richmond VA to Telesboro NJ	2	2			4	1.9 \$1,187.50	\$118.75	\$1,187.50	\$1,187.50	6	\$325.00	\$325.00	2	\$650.00	\$650.00	\$650.00	
14-Jun-91	7. Telesboro NJ to Richmond VA	2	2			5	1.9 \$1,187.50	\$118.75	\$1,187.50	\$1,187.50	6	\$646.00	\$646.00	2	\$1,292.00	\$1,292.00	\$1,292.00	
16-Jul-91	8. Washington DC to Richmond VA	1	0			1	-					\$312.00	\$312.00	1	\$312.00	\$312.00	\$312.00	
27-Jul-91	9. Richmond VA to Richmond VA	2	2			4	-					\$581.00	\$581.00	1	\$581.00	\$581.00	\$581.00	
28-Jul-91	10. Richmond VA to Richmond VA	1	1			4	3.6 \$2,250.00	\$19.00	\$2,269.00	\$2,269.00	8	\$2,514.00	\$2,514.00	3	\$7,542.00	\$7,542.00	\$7,542.00	
	Parking/Landing Fees							\$411.77	\$2,680.77	\$2,680.77		\$826.00	\$826.00	3	\$2,478.00	\$2,478.00	\$2,478.00	\$1,728.00
	Pilot's Expenses																	
19-Oct-91	11. San Antonio TX to Richmond VA	1	2			5	-					\$635.00	\$635.00	2	\$1,270.00	\$1,270.00	\$1,270.00	
29-Oct-91	12. Richmond VA to Chicago IL	2	1			3	-					\$952.00 (A)	\$952.00 (A)	2	\$1,904.00	\$1,904.00	\$1,904.00	
30-Oct-91	13. Chicago IL to Manhattan KS	2	1			3	-					\$229.00 (A)	\$229.00 (A)	2	\$458.00	\$458.00	\$458.00	
31-Oct-91	14. Manhattan KS to Topeka KS	2	1			3	-					\$609.00 (B)	\$609.00 (B)	2	\$1,218.00	\$1,218.00	\$1,218.00	
31-Oct-91	15. Topeka KS to St. Louis MO	2	1			3	-			\$744.44	11	\$602.00	\$602.00	2	\$1,204.00	\$1,204.00	\$1,204.00	\$4,471.56
31-Oct-91	16. St. Louis MO to Richmond VA	2	1			3	-					\$441.00	\$441.00	4	\$1,764.00	\$1,764.00	\$1,764.00	
30-Oct-91	17. Richmond VA to Manchester NH	2	2			5	3.3 \$2,062.50	\$210.56	\$2,273.06	\$2,273.06	12	\$441.00	\$441.00	3	\$1,323.00	\$1,323.00	\$1,323.00	\$813.94
01-Nov-91	18. Manchester NH to Richmond VA	1	2			4	-					\$304.00 (A)	\$304.00 (A)	2	\$608.00	\$608.00	\$608.00	
	Pilot's overnight expenses											\$375.00 (A)	\$375.00 (A)	2	\$750.00	\$750.00	\$750.00	
06-Nov-91	19. Richmond VA to Telesboro NJ	2	1			3	-					\$325.00	\$325.00	1	\$325.00	\$325.00	\$325.00	\$1,306.16
27-Nov-91	20. Telesboro NJ to Washington DC	2	2			4	-			\$456.84	13	\$472.00	\$472.00	2	\$944.00	\$944.00	\$944.00	
28-Nov-91	21. Washington DC to Richmond VA	1	0			1	-					\$448.00	\$448.00	3	\$1,344.00	\$1,344.00	\$1,344.00	\$622.00
30-Nov-91	22. Washington DC to Newville TN	2	1			3	-											
31-Nov-91	23. Newville TN to Richmond VA	2	1			4	2.8 \$1,625.00	\$41.00	\$1,666.00	\$1,666.00	14	\$448.00	\$448.00	2	\$896.00	\$896.00	\$896.00	
	Parking/Landing Fees																	

FAIR

MEMORANDUM FOR THE RECORD
 ANALYSIS OF COMMITTEE'S USE OF COMMERCIAL PLANE
 (Reimbursements to Commonwealth of Virginia
 compared to first class airfare for trip)

(1) Date of Trip	(2) Depart/Arrive	(3) # of Passengers (8)	(4) Press/Staff+ (P1) (P2) (P3) (P4)	(5) Other (P5)	(6) Total	(7) Total # flight hours	(8) Leg cost (cl. 8 X \$625/hr) see (P5)	(9) Amount Billed to Committee	(10) Other Expenses (9)+(10)	(11) Trip/Leg Total	(12) Invoice Total	(13) Index See CB 7.1.b (6A) (P6)	(14) Cost of 1st Class fare per leg (sum of leg totals)	(15) Cost of Charter per leg (sum of leg totals)	(16) No. of Staff Press, Other	(17) Total Cost per leg (sum of leg totals)	(18) Total 1st Class Cost (sum of leg totals)	(19) Amt VA under- billed (18)-(17)	
54 [5-Nov-91]	Richmond VA to Manchester NH	4	1			5		\$1,923.34			\$1,923.34	15	\$441.00	\$198.00 (A)	3	\$594.00	\$1,804.00	\$1,880.66	
55	Manchester NH to Kansas MO	3	1			4							\$198.00 (A)	\$482.00 (A)	3	\$1,446.00			
56 16-Nov-91	Kansas MO to Richmond VA	3	1			4							\$404.00	\$404.00	3	\$1,212.00	\$2,424.00	\$799.00	
57	Richmond VA to Detroit MI	2	1	1		4	2.8 \$1,625.00	\$1,625.00			\$1,625.00	16	\$482.00	\$482.00	5	\$2,410.00			
58	Detroit MI to Richmond VA	2	2	1		5							\$482.00	\$482.00	5	\$2,410.00	\$4,820.00	\$2,954.50	
60	Richmond VA to Boston MA*	3	2	1		6	2.8 \$1,812.50	\$1,812.50	\$53.00	\$1,865.50	\$1,865.50	17	\$241.00	\$241.00	3	\$723.00			
61 20-Nov-91	Boston MA to Richmond VA*	3	2	1		6							\$529.00	\$529.00	2	\$1,058.00			
62	Richmond VA to Richmond VA Parking/Landing Fees												\$552.00	\$552.00	2	\$1,104.00			
64	Richmond VA to Norfolk VA	2	2	1		5							\$310.00	\$310.00	2	\$620.00			
65 21-Nov-91	Norfolk VA to Atlanta GA	2	1			3							\$487.00 (A)	\$487.00 (A)	4	\$1,948.00			
65a	Norfolk VA to Columbus GA	2	1			3							\$627.00 (A)	\$627.00 (A)	5	\$3,135.00			
66 23-Nov-91	Atlanta GA to Columbus GA	2	1			3							\$589.00 (A)	\$589.00 (A)	6	\$3,534.00	\$12,122.00	\$8,067.91	
67	Columbus GA to Chicago IL	2	2	1		5							\$441.00 (A)	\$441.00 (A)	5	\$2,205.00			
68	Chicago IL to Dallas TX	2	3	1		6							\$323.00 (A)	\$323.00 (A)	0	\$0.00			
69	Dallas TX to Salem AL	2	3	1		7							\$427.00 (A)	\$427.00 (A)	4	\$1,708.00			
70	Salem AL to Richmond VA	2	3	1		7							\$312.00 (A)	\$312.00 (A)	3	\$936.00			
71	Richmond VA to Concord NH*	2	1	1		6							\$325.00	\$325.00	1	\$325.00	\$5,174.00		
72	Concord NH to Berlin NH**	0	0	0		0							\$441.00 (A)	\$441.00 (A)	3	\$1,323.00			
73 04-Dec-91	Concord NH to Virginia Beach VA	2	2	1		5							\$198.00 (A)	\$198.00 (A)	0	\$0.00			
74 05-Dec-91	Berlin NH to Virginia Beach VA	2	2	1		5							\$482.00 (A)	\$482.00 (A)	3	\$1,446.00	\$2,726.01		
75	VA Beach to Washington DC	2	1	1		4			\$3,404.49	\$3,404.49					1	\$325.00			
76	VA Beach to Washington DC	2	1	0		3							\$441.00 (A)	\$441.00 (A)	3	\$1,323.00			
76a	Washington DC to Richmond VA	1	2	1		4							\$198.00 (A)	\$198.00 (A)	0	\$0.00			
77	Richmond VA to Concord NH	1	2	1		4							\$482.00 (A)	\$482.00 (A)	3	\$1,446.00	\$2,726.01		
78 18-Dec-91	Concord NH to Newus NH**	0	0	0		0									0	\$0.00			
79	Concord NH to Newus NH**	0	0	0		0									0	\$0.00			
80	Newus NH to Richmond VA	1	2	1		4									3	\$1,446.00	\$2,726.01		
81																			
82																			
83																			
84																			
85																			
86																			
87 FOOTNOTES:																			
88 (P1) Press	identified as press related per typed itinerary																		
89	identified as campaign related per reimbursement letter																		
90 (P2) Staff	identified as campaign related per reimbursement letter																		
91	used to represent the names of Executive Protective staff accompanying Governor Milner																		
92 (P3) EIU	is used to represent the names of Executive Protective staff accompanying Governor Milner																		
93	not identified as campaign related, no reason given for non campaign related																		
94 (P4) Other	not identified as campaign related, no reason given for non campaign related																		

Total: \$32,414.00
 Total Underbilled: \$57,828.00 \$25,414.00
 \$8.00

FAIR

VALUES FOR PASSENGER COSTS
ANALYSIS OF COMPETITOR'S USE OF COMMERCIAL FLIGHTS
(Reimbursements to Commonwealth of Virginia
compared to direct class airfare for trip)

(1) Date of Trip	(2) Depart/Arrive	(3) # of Passengers	(4) Class	(5) Other	(6) Total	(7) Flight hours	(8) Log cost (cl. 8 X \$425/hr)	(9) Log cost Total	(10) Other Expenses (9)X(10)	(11) Trip/Log Total	(12) Invoice Total	(13) Index See CR/1.b GSA (75)	(14) Cost of Let Class fare per GSA (75)	(15) Cost of Charter , Other	(16) No. of Staff Fares	(17) Total Let Class Cost per leg (14)X(16)	(18) Total Let Class Cost (Sum of Leg totals)	(19) Amt. WA under- billed (18)-(12)

95 (75) Data for chartering NWA Omega Citation 5500 Jet from Commonwealth of Virginia

96 (75) Fare information from General Services Administration - Transportation

97 Audit Division (PIPS - Passenger Incentive Pricing/Aviation System)

98 (A) Airfare based on a flight to the nearest city, en route, which is served by a direct commercial flight.

99 For example, there was no commercial service to Toledo, OH in leg 6 & 7

100 thus, the GSA representative used airfare from Richmond to Newark.

101 (B) Airfare based on a flight between two locations, with an intermediate linking point.

102 For example, there was no direct commercial flight from Topeka to St. Louis;

103 thus, the GSA representative used airfare from Topeka to Kansas City to St. Louis

104 . The flight log information provided from the Commonwealth did not provide

105 any information regarding these flights; flight information was taken from

106 the Committee's itinerary and accompanying invoices from the Commonwealth.

107 ... No cost was calculated for these flights, distance was immaterial.

108 (8) The total passengers used in each leg of the analysis corresponds to the total passengers

109 listed on the Commonwealth's flight log for that leg. In order to identify which passengers

110 were "staff", "press", and "other", the auditor used the invoices from the Commonwealth

111 and itinerary provided by the Committee. IT MUST BE NOTED THAT IN MOST INSTANCES THERE ARE DISCREPANCIES BETWEEN THE NUMBER OF

112 PASSENGERS PER THE FLIGHT LOG AND PER THE ITINERARY/INVOICES.

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Wilder for President Committee
Schedule of Payments to the Treasurer of Virginia

(2)

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	Date of Payment	Service Provided	Amount
			\$1,257.54
1	28-Jun-91	Use of VA facility	\$3,323.08
2	28-Jun-91	Use of VA plane-legs 1 & 2	\$4,647.39
3	28-Jun-91	Use of VA plane-legs 3 & 5	\$1,187.50
4	28-Jun-91	Use of VA plane-legs 6 & 7	\$1,525.59
5	28-Jun-91	Executive Mans.-Dinner	\$1,152.07
6	02-Aug-91	Executive Mans.-Dinner	\$2,930.77
7	21-Aug-91	Use of VA plane-legs 11-15	\$45.03
8	21-Aug-91	dinner expense	\$877.99
9	10-Sep-91	reception	\$434.59
10	25-Sep-91	catering	\$113.12
11	20-Oct-91	breakfast reception	\$182.44
12	05-Dec-91	columnists luncheon	\$9,236.50
13	05-Dec-91	Use of VA plane-legs 18 19-25 29-31 35-36 37-38	\$2,307.06
14	05-Dec-91	construction for press conference	\$5,000.00
15	02-Jan-92	Use of phones	\$14,435.72
16	08-Jan-92	Use of VA plane-legs 8-10 26-28 32-34 39-45 48-54	\$350.00
17	16-Jan-92	Sound system- Presidential announcement	\$4,853.43
18	15-Jan-92	Visa-travel expense	\$7,795.00
19	15-Jan-92	Reimbursement for services by G.Davidson	\$6,525.00
20	23-Jan-92	Use of VA helicopter (state police heli.)	\$35.00
21	29-Jan-92	reimbursement for travel	\$1,456.60
22	07-Feb-92	reception	\$77.00
23	07-Feb-92	reimbursement for expenses/telephone	\$15.50
24	28-Feb-92	reimbursement for expenses/Federal Express	\$294.50
25	04-Mar-92	reimbursement for expenses	\$49.00
26	05-Mar-92	reimbursement for expenses	\$535.46
27	11-Mar-92	reimbursement for expenses	\$86.25
28	15-Apr-92	reimbursement for expenses	
Total:			\$70,730.02

WILDER FOR PRESIDENT COMMITTEE

SCHEDULE OF ACCOUNTS PAYABLE
NOT CONSIDERED
QUALIFIED CAMPAIGN EXPENSES

VENDOR	DATE PAID	AMOUNT	REASON
1 C & P Telephone	see F5	\$1,470.96	Not Documented F5
2 Robert Ford	see F5	\$434.40	Not Documented F5
3 The Gorman Group	see F5	\$10,000.00	Not Documented F1, F5
4 Linda Hatch	see F5	\$480.00	Not Documented F2, F5
5 Lasser & Assoc.	see F5	\$10,000.00	Not Documented F5, F6
6 William Keough	29-Jan-92	\$5,000.00	Not Documented
7 Ruth Jones	29-Jan-92	\$10,000.00	Not Documented
8 John Brazell	19-Feb-92	\$2,000.00	Not Documented
9 First Consumers	20-Feb-92	\$814.00	Not Documented
10 Ron Lester	15-Apr-92	\$2,392.30	Non-Qualified Campaign Expenses F3
11 Federal Express	12-May-92	\$456.75	Not Documented F3
12 AT&T	25-Mar-92	\$406.00	Not Documented
13 AT&T	12-May-92	\$83.45	Not Documented
14 C & P Telephone	30-Jan-92	\$592.61	Not Documented F4
15 C & P Telephone	02-Jan-92	\$553.86	Not Documented F4
16 C & P Telephone	04-Feb-92	\$1,134.05	Not Documented F4
17 C & P Telephone	01-Apr-92	\$584.07	Not Documented
18 Trsr of Virginia	15-Jan-92	\$2,531.83	Not Documented F7
Total		\$48,934.28	

FOOTNOTES:

- F1 Job order cancelled.
- F2 Audit staff recognized \$378.50 for travel in 12-91.
- F3 Documentation in vendor file supports only \$786.00: diff. \$456.75.
- F4 Need entire phone billing for documentation.
- F5 No date can be identified; items listed on Committee's accounts payable NOCO schedule, but no disbursement record can be found.
- F6 Documentation supports \$826.48; \$9,173.52 difference is undocumented
- F7 Payment for use of credit card = \$4,853.45; \$2,531.83 represents the undocumented portion

WILDER FOR PRESIDENT COMMITTEE
SCHEDULE OF SEVERANCE PAYMENTS

	(1) PAYEE	(2) DATE	(3) AMOUNT	
1	India Adeos	29-Jan-92	\$1,600.00	F1
2	Scott Bates	30-Jan-92	\$1,500.00	
3	Sarah Callahan	29-Jan-92	\$1,800.00	
4	Eric Easter	29-Jan-92	\$2,000.00	
5	John Hotchkiss	29-Jan-92	\$1,200.00	
6	Nicholas Perrins	30-Jan-92	\$1,200.00	F1
7	Adam Slate	29-Jan-92	\$800.00	F1
8	Antoine Smith	29-Jan-92	\$1,100.00	F1
9	Herman Stevenson	29-Jan-92	\$1,400.00	
10	James Thompson	29-Jan-92	\$1,000.00	
11	Jeremy Wiley	29-Jan-92	\$1,700.00	F1
TOTAL:			\$15,300.00	

FOOTNOTES:

F1 Continued to receive normal salary payments for February, March, and April(1992); subsequent to the January 1992 severance payments.

WILDER FOR PRESIDENT COMMITTEE
SCHEDULE OF APPARENT NON-QUALIFIED
CAMPAIGN EXPENSES

VENDOR	DATE PAID	AMOUNT
1 Joe Johnson	15-Jan-92	\$1,513.00
2 C & P Telephone	30-Jan-92	\$592.61
3 C & P Telephone	02-Jan-92	\$553.86
4 C & P Telephone	04-Feb-92	\$1,134.05
5 Trsr of Virginia	15-Jan-92	\$2,531.83
6 John Brazeli	19-Feb-92	\$2,000.00
7 First Consumers	20-Feb-92	\$814.00
8 Trsr of Virginia	08-Jan-92	\$2,784.46
Total:		\$11,923.81



FEDERAL ELECTION COMMISSION

December 13, 1993

MEMORANDUM

TO: Robert J. Costa
Assistant Staff Director
Audit Division

THROUGH: John C. Surina
Staff Director

FROM: Lawrence M. Noble
General Counsel

Kim Bright-Coleman
Associate General Counsel

Lorenzo Holloway
Assistant General Counsel

Gregory R. Baker
Attorney

SUBJECT: Proposed Final Audit Report on the Wilder for
President Committee (LRA #395/AR #92-59)

The Office of General Counsel has reviewed the proposed Final Audit Report on the Wilder for President Committee ("the Committee") submitted to this Office on October 8, 1993.^{1/} The following memorandum summarizes our comments on the proposed report. If you should have any questions concerning our comments, please contact Gregory R. Baker, the attorney assigned to this audit.

We note initially that the proposed report recommends that the Committee make payments to the United States Treasury totaling \$46,330.53. We concur with the findings in the proposed Final Audit Report which are not discussed separately

^{1/} Since the proposed Final Audit Report does not include any matters exempt from public disclosure under 11 C.F.R. § 2.4, we recommend that the Commission's discussion of this document be conducted in open session. Throughout our comments, "FECA" refers to the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. §§ 431-455, and "Matching Payment Act" refers to the Presidential Primary Matching Payment Account Act, 26 U.S.C. §§ 9031-9042.

below.^{2/} We also concur with the Audit staff's recommendation that no further action be taken with respect to the Committee's use of corporate aircraft because the resulting amount of underpayment to the corporate entity is insignificant (\$1,641). However, we disagree with the Committee's position that the lowest first-class airfare may be used in calculating the amount owed to corporate entities. It would circumvent the purpose of section 114.9 to allow committees to use the lowest possible first-class airfares with the maximum possible discount included. See 11 C.F.R. § 114.9(e) (in the case of travel to a city served by regularly scheduled commercial service, the committee must reimburse the corporation the first-class airfare equivalent for the use of the corporation's aircraft). Generally, passenger conditions or restrictions for discount airfare do not exist with respect to a committee's use of corporate aircraft. Thus, it would not be appropriate to allow a committee to use the maximum possible discount in these instances.

I. APPARENT EXCESSIVE AND PROHIBITED CONTRIBUTIONS
(II.A. and II.B.)

The Committee raises several challenges to the sampling technique used by the Audit Division to determine (or project) excessive or prohibited contributions in its response to the Interim Audit Report. In addition, the Committee challenges the Commission's authority to require payment to the Treasury for unresolved excessive and prohibited contributions.^{3/} The Office of General Counsel concurs with the Audit staff's recommendations that the Committee make a payment to the Treasury for projected excessive and prohibited contributions. However, the proposed report should include an expanded discussion of the Commission's sampling method to alleviate the

^{2/} The Committee did not address the findings regarding the transactions with the Commonwealth of Virginia in its response to the Interim Audit Report. Since these findings have not been adjusted and we previously commented on the issues, it is not necessary to comment further at this time.

^{3/} The Audit staff notes that if the Committee makes the refunds to the contributors, the amounts will not be considered qualified campaign expenses. We concur with the Audit staff's proposed treatment of these refunds as non-qualified campaign expenses. Although the Commission's regulations do not address this issue, the Committee was notified of the Commission's policy concerning payment to the Treasury in the June 2, 1992 letter and was informed that refunds to the contributors after the dates specified would not be recognized. Thus, any refunds made after the dates specified would be in contradiction to the Commission's approved policy. Cf. 11 C.F.R. § 9032.9(a)(3) (any expense incurred or paid which constitutes a violation of state or federal law is a non-qualified campaign expense).

Committee's confusion and clarify that only certain contributions are reviewed on a 100% basis, while all others are reviewed on a sample basis.^{4/}

The use of statistical sampling is a legally acceptable technique for projecting certain components of a large universe, such as excessive and prohibited contributions.^{5/} Courts have generally deferred to agency expertise in upholding the use of statistical sampling. See, e.g., Chavez County Home Health Service v. Sullivan, 931 F.2d 914 (D.C. Cir. 1991) (sampling audit used to recoup Medicaid overpayments to health care providers); Michigan Dep't of Educ. v. U.S. Dep't of Educ., 875 F.2d 1196 (6th Cir. 1989) (statistical sampling has generally been upheld when audits of the universe of cases would be "impossible."). Further, the court in State of Georgia v. Califano, 446 F. Supp. 404, 409 (N.D.Ga. 1977), upheld the use of statistical sampling, stating that the "[p]rojection of the nature of a large population through review of a relatively small number of its components has been recognized as a valid audit technique" The majority of cases addressing statistical sampling, while acknowledging its potential for unfairness, have approved its use. See Chaves County Home Health Service, 931 F.2d 914 (D.C. Cir. 1991).

Furthermore, the Commission may compel payment to the Treasury for projected excessive and prohibited contributions. While neither the Matching Payment Act nor the Commission's regulations specifically address the issue of whether the Commission has the authority to compel such a payment, they do not prohibit it. The Commission has the express authority to formulate policy with respect to the Matching Payment Act under 2 U.S.C. § 437 and, as such, has the authority to compel such a payment to the Treasury. Moreover, such payments are implicit

^{4/} The Committee seems disturbed by the fact that the conclusions reached by the Audit staff with respect to the excessive and prohibited contributions appear to differ. However, the Committee's perception mischaracterizes the Audit staff's procedures. The Audit staff followed the appropriate procedures governing sample reviews when it conducted this audit. In order to determine the amount of apparent excessive contributions, the Audit staff employs both a 100% review and a sample review. And the Audit staff only performs a sample review to determine apparent prohibited contributions. Thus, the Audit staff did not review all of the contributions on a 100% review basis. In fact, the Audit staff only reviewed the facially excessive contributions and contribution refunds on a 100% basis.

^{5/} The sampling method adopted by the Commission for the 1992 election cycle to project excessive and prohibited contributions has actually been in use since 1980 to administer the matching funds submissions.

in the FECA and the Commission's regulations. For example, the Commission stated in Advisory Opinion ("AO") 1991-39 that where a committee could not determine the identity of the original contributor, prohibited funds should be disbursed for any lawful purpose unrelated to federal elections, *i.e.*, payment to the federal government, state or local governments or a qualified charitable organization.

The payment to Treasury in this instance is analogous to, and consistent with, the requirement that stale-dated checks be paid to the Treasury. 11 C.F.R. § 9038.6. The stale-dated check provision arose after the 1984 election cycle and was enunciated as a means to codify the Commission practice of disgorgement which was implemented during that cycle. *See e.g.*, 52 Fed. Reg. 20864, 20874 (June 3, 1987). We also note that in the case of stale-dated checks, the committee has already made refunds but the payees have not cashed the checks. In the present scenario, the Committee has failed to initiate remedial action (*i.e.*, issued refund checks to the contributors). Therefore, we maintain that if the Commission can require payment to the Treasury in situations where a committee has attempted to take remedial action, then the Commission has the authority to compel a payment in situations where a committee has not taken any remedial action.^{6/}

Moreover, the equitable doctrine of disgorgement supports the payment to Treasury in this instance. *See generally United States v. Bonanno Organized Crime Family of La Cosa Nostra*, 683 F. Supp. 1411 (E.D.N.Y. 1988), *aff'd*, 879 F.2d 20 (2d Cir. 1989) (holding disgorgement to be an appropriate, non-punitive remedy to deprive wrongdoers of their ill-gotten gains and to deter future violations).^{7/} A payment to the Treasury is an equitable remedy for contributions that have been accepted in

^{6/} The Committee cannot avoid making payment to the Treasury by failing to address the contributions in a timely fashion. Any refunds to the individuals at this time would not vitiate the apparent violations. *See* 11 C.F.R. §§ 103.3 and 110.1; *see also* Letter from the Commission to the Committee, dated June 2, 1992. Under the Commission's authority to administer the Matching Payment Act, it must ensure that committees receiving public financing adhere to the FECA and the laws governing public financing. *See* 2 U.S.C. §§ 431-455; 26 U.S.C. §§ 9031-9042. Requiring payment to Treasury in this instance helps to achieve this goal.

^{7/} The disgorgement approach eliminates the need for the Commission to monitor a committee's refunds of illegal contributions. In addition, it would be easier for a committee to make one payment to the Treasury as opposed to refunding multiple contributions. This is a very practical approach in situations where it is difficult to discern who the original contributors were.

violation of 2 U.S.C. §§ 441a and 441b, and this equitable doctrine is consistent with past Commission practice. See Matter Under Review ("MUR") 1704 (Mondale)(based upon preliminary estimates, the Commission directed respondents to pay \$350,000 to the United States Treasury for contributions that would have exceeded the limitations of 2 U.S.C. § 441a). See e.g., Plaintiff's Motion to Effectuate Judgment, FEC v. Populist Party, No. 92-0674 (HHG) (D.D.C. filed May 4, 1993).

II. APPARENT NON-QUALIFIED CAMPAIGN EXPENSES (III.C.)

In its response to the Interim Audit Report, the Committee challenges the Audit staff's classification of certain severance payments, salary payments and several undocumented expenditures as non-qualified campaign expenses. However, we concur with the Audit Division's recommendation that the Committee must make a pro-rata repayment to the Treasury for these expenses. It appears that the Committee recharacterized the apparent non-qualified expenses in an effort to make them appear to be qualified campaign expenses. These reclassifications are not supported by documentation demonstrating that they were, in fact, qualified campaign expenses. See 11 C.F.R. §§ 9033.11 and 9038.2(b)(3).

For example, we do not agree with the Committee's classification of several expenses as severance payments. Severance payments are generally recognized as qualified campaign expenses. However, such payments are usually paid at the termination of the employment relationship. Sejman v. Warner-Lambert Co., Inc., 889 F.2d 1346, 1350 (4th Cir. 1989)(the court upheld the company's severance pay policy which excluded from the definition of job termination those individuals who continued working at the same job, in the same facility, at the same tasks for comparable rates of compensation and benefits.); see Final Audit Report on Friends of Gary Hart - 1988, Inc., approved January 25, 1990 (the severance payments were generally small in nature and basically consisted of payments made to staff for the purpose of traveling home after the campaign had ended). Therefore, the payments to the five individuals, totaling \$6,400, who continued working for the Committee well after the severance payments were made are not qualified campaign expenses.^{8/}

The salary payments of \$10,000 to Ms. Jones and \$5,000 to Mr. Keough should also be classified as non-qualified campaign

^{8/} This distinction is less clear with respect to the severance payments made to the six individuals, totaling \$8,900, whose employment was terminated on or about the same time the severance payments were made. However, since the Committee failed to provide any employment agreements or other documentation supporting these payments, the payments should continue to be classified as non-qualified campaign expenses.

Memorandum to Robert J. Costa
Proposed Final Audit Report
Wilder for President Committee
(LRA #395/AR #92-59)
Page 6

expenses. Ms. Jones never billed the Committee for the \$10,000 and she was already paid for the services she performed for the Committee. The \$10,000 was originally included in the Committee's Statement of Net Outstanding Campaign Obligations ("NOCO Statement") as an accounting cost. However, the Committee recharacterized this expense and is currently treating the \$10,000 as a legitimate salary payment. The Committee originally disclosed Mr. Keough's payment as salary for duties performed during the winding down phase of the campaign, not as a qualified campaign expense for services provided during the active phase of the campaign. Moreover, Mr. Keough never billed the Committee for his services. Although salary payments are generally regarded as legitimate winding down costs under 11 C.F.R. § 9034.4(a)(3), the Committee has failed to provide information that justifies the payments to Ms. Jones and Mr. Keough. See 11 C.F.R. §§ 9033.11 and 9038.2(b)(3).

Finally, the Committee contends that a January 17, 1993 event was a thank you party for Committee staff and volunteers and as such was a qualified campaign expense.^{9/} Payments made in connection with thank you parties and thank you notes are generally treated as qualified campaign expenses. See Final Audit Report on the Dukakis-Bentsen Committee, Inc., approved November 22, 1991; Paul Simon for President Committee, Statement of Reasons Supporting the Final Repayment Determination, approved March 4, 1993. In cases where these expenses have been allowed, the payments were sufficiently documented and the nature of the function was clearly enunciated. See 11 C.F.R. §§ 9033.11 and 9038.2(b)(3). In this case, there is no evidence indicating that the event in question was a thank you party. In fact, the only information available indicates that the event was actually a birthday celebration for Governor Wilder. Therefore, the expenses paid in connection with this event appear to be non-qualified campaign expenses. 11 C.F.R. § 9032.9(a)(2).

^{9/} The information gleaned by the Audit Division does not indicate that the Committee was under a contractual obligation to hold the event. However, if the Committee would have lost its deposit in this particular case, we would contend that the deposit would constitute a qualified campaign expense since it was for a legitimate campaign purpose and incurred prior to the candidate's date of ineligibility. See 11 C.F.R. § 9032.9(a)(1) and (2).



FEDERAL ELECTION COMMISSION

February 17, 1994

2/17/94
K...
AC

MEMORANDUM

TO: Robert J. Costa
Assistant Staff Director
Audit Division

THROUGH: John C. Suriba
Staff Director

FROM: Lawrence M. Noble
General Counsel

Kim Bright-Coleman
Associate General Counsel

Lorenzo Holloway
Assistant General Counsel

Gregory R. Baker
Attorney

SUBJECT: Proposed Final Audit Report on the Wilder for
President Committee -- Additional Findings
(LRA #395/AR #94-1)

The proposed Final Audit Report was initially submitted to this Office on October 8, 1993, and we forwarded our comments on that report to the Audit Division on December 13, 1993. The Office of General Counsel has reviewed the additional findings to the proposed Final Audit Report on the Wilder for President Committee ("the Committee") submitted to this Office on January 14, 1994.^{1/} The following memorandum provides our comments on the additional findings.

^{1/} The Commission approved the Interim Audit Report on May 25, 1993. On August 12, 1993, the Committee submitted its response to the Interim Audit Report. However, in light of the decision in FEC v. NRA Political Victory Fund, et al., 6 F.3d 821 (D.C. Cir. 1993), the Commission revoked the Interim Audit Report on November 9, 1993. The Committee responded to the revoked report on December 13, 1993.

I. USE OF COMMONWEALTH'S AIRPLANE AND HELICOPTER (II.D.1.)

The Office of General Counsel concurs with the Audit Division's recommendation that the Committee reimburse the Commonwealth of Virginia \$27,976.50 for the Committee's use of the Commonwealth's airplane and helicopter. The Committee's response to the reissued Interim Audit Report focuses exclusively on its use of the Commonwealth's airplane and helicopter.^{2/} First, the Committee challenges the Audit Division's use of the Government Services Administration's ("GSA") airfare information. The Committee asserts that the Commission's regulations do not specify that the first class airfare be based on GSA calculations.

The Committee made, and we rejected, similar arguments with respect to the Committee's use of corporate aircraft (II.E.). See Legal Comments to the Proposed Final Audit Report on the Wilder for President Committee, dated December 13, 1993. The Commission's regulations do not address whether the first class airfare must be based on the GSA calculations. However, we believe that, absent a showing by the Committee that its method was reasonable, it is acceptable to rely on the GSA calculations. See Legal Comments to the Proposed Final Audit Report on the Harkin for President Committee, dated January 19, 1994.^{3/} The Audit staff's method provides a fair estimate of the reasonable first class airfare consistent with 11 C.F.R. § 9034.7. The Audit staff only uses the GSA figures as a guideline for calculating the lowest, non-discounted first class

^{2/} Based on the Committee's response, the Audit staff has increased the amount the Commonwealth underbilled the Committee from \$25,847.04 to \$27,976.50. Due to the increased amounts owed to the Commonwealth, the Audit staff adjusted the Committee's Statement of Net Outstanding Campaign Obligations ("NOCO Statement") and, as a result, the Committee's deficit increased from \$67,396.86 to \$69,526.32. Consequently, the Committee's repayment for receiving matching funds in excess of entitlement (III.D.) has been reduced from \$25,074.42 to \$22,944.96.

^{3/} Contrary to Harkin for President, the Committee in this instance did not appear to make every feasible attempt to conform to the regulations. The Harkin Committee submitted an affidavit from its travel agent indicating that to the best of his ability, the travel agent quoted the "valid, industry standard non-discounted first class airfare" to that committee.

airfare.^{4/} The Committee used the figures billed by the Commonwealth as the first class airfare equivalent, which happen to be \$27,976.50 less than the amounts computed consistent with the GSA figures. The Committee has not demonstrated that it was billed the reasonable first class airfare equivalent. In fact, the Committee has failed to provide any documentation in support of its arguments. See Legal Comments to the Proposed Final Audit Report on the Harkin for President Committee, dated January 19, 1994.

Second, the Committee challenges the Audit staff's authority to charge additional amounts for flights where the Commonwealth's plane traveled, without passengers, to or from a campaign related event. The Committee argues that it was billed the correct amount by the Commonwealth for these flights and that "such expenditures do not permit the FEC to include such flights in its calculations when such flights clearly are not subject to federal election law." We disagree with the Committee's interpretation of the Commission's authority. Although the aircraft traveled without passengers, the flights were to and from campaign related events, where the Committee's staff either boarded or departed the aircraft. Therefore, any costs associated with the positioning of the aircraft for this purpose was made in connection with a campaign related event. See 11 C.F.R. § 9034.7 (any expenditure made for travel relating to the campaign of a candidate seeking nomination for election to the office of president, shall, pursuant to the provisions of 11 C.F.R. § 9034.7(b), be qualified expenses and must be reported by the candidate's authorized committees).^{5/} Thus, the Commission has the authority to determine whether the Committee

^{4/} The GSA selects airfare information utilizing the actual date of the trip. The date is then entered into the GSA computer program which selects and prints available fares for those carriers providing first class commercial service on the date of the trip. The Audit staff merely selects the lowest unrestricted, non-discounted first class airfare. We believe the Committee should be required to use the unrestricted, non-discounted fares in its calculations because the service provided by the Commonwealth is outside the ordinary course of its business and because the Committee received unrestricted service.

^{5/} The Audit staff made several revisions to the amounts owed the Commonwealth. For instance, the Audit staff determined that trips made on July 14, 1991 and July 21, 1991, were not campaign related. See Finding III.C.4. In addition, the Audit staff determined that the Commonwealth failed to bill the Committee for 4.1 flight hours. Thus, the Audit staff recommends that the Committee reimburse the Commonwealth an additional \$2,562.50.

was charged the correct amount for these flights.^{6/} See 2 U.S.C. § 437c(b)(1) (The Commission's authority to administer the public financing provisions); see also 26 U.S.C. § 9039(b).

II. APPARENT NON-QUALIFIED CAMPAIGN EXPENSES -- USE OF COMMONWEALTH PLANE (III.C.4.)

We concur with the Audit staff's treatment of certain expenditures related to the use of the Commonwealth's plane as non-qualified campaign expenses. Specifically, the Committee's response identified expenses for two non-campaign related trips which were previously included as qualified campaign expenses. As a result, the Audit staff included the amounts (\$2,785) as non-qualified campaign expenses in the proposed Final Audit Report.^{7/} The Committee's response and newspaper accounts of the trips in question clearly indicate that the flights were not campaign related. The expenses were apparently for travel to and from New York City in connection with the Governor's vacation to Switzerland. See Washington Post, July 26, 1991, at C1; see also Washington Times, August 1, 1991, at B1. Since the trips were not campaign related, the expenditures incurred in connection with these trips are non-qualified campaign expenses. See 11 C.F.R. § 9032.9(a)(1).

^{6/} The inclusion of these amounts is consistent with the Audit Division's practice regarding "positioning flights" in which committees are charged for empty flights in similar circumstances. See Proposed Interim Audit Report on the Bush-Quayle '92 Primary Committee ("Positioning flights" are those flights which are necessary to get the airplane to the city where the relevant committee passengers are in order to get them to the next location).

^{7/} Thus, the pro-rata repayment increased from \$12,072.48 to \$12,855.49.



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

May 11, 1994

Mr. Mark Warner, Treasurer
Wilder for President Committee
c/o Leslie Kerman, General Counsel
Epstein, Becker & Green, P.C.
1227 25th Street, N.W.
Washington, D.C. 20037-1156

Dear Mr. Warner:

Attached please find the Final Audit Report on Wilder for President Committee. The Commission approved this report on April 21, 1994. As noted on page 5 of the report, the Commission may pursue any of the matters discussed in an enforcement action.

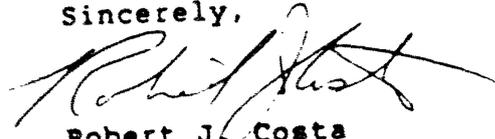
In accordance with 11 C.F.R. §9038.2(c)(1) and (d)(1), the Commission has made an initial determination that the Candidate repay the Secretary of the Treasury \$31,058 within 90 days after service of this report (August 9, 1994). Should the Candidate dispute the Commission's determination that a repayment is required, Commission regulations at 11 C.F.R. §9038.2(c)(2) provide the Candidate with an opportunity to submit in writing, within 30 calendar days after service of the Commission's notice (June 10, 1994), legal and factual materials to demonstrate that no repayment, or a lesser repayment, is required. Further, 11 C.F.R. §9038.2(c)(3) permits a Candidate who has submitted written materials, to request an opportunity to make an oral presentation in open session based on the legal and factual materials submitted.

The Commission will consider any written legal and factual materials submitted by the Candidate within the 30 day period in making a final repayment determination. Such materials may be submitted by counsel if the Candidate so elects. If the Candidate decides to file a response to the initial repayment determination, please contact Kim L. Bright-Coleman of the Office of General Counsel at (202) 219-3690 or toll free at (800) 424-9530. If the Candidate does not dispute this initial determination within the 30 day period provided, it will be considered final.

Letter to Mr. Warner
Page 2

Any questions you may have related to matters covered during the audit or in the report should be directed to Brian Dehoff or Tom Nurthen of the Audit Division at (202) 219-3720 or toll free at (800) 424-9530.

Sincerely,



Robert J. Costa
Assistant Staff Director
Audit Division

Attachment as stated



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

May 11, 1994

The Honorable Lawrence Douglas Wilder
Wilder for President Committee
c/o Leslie Kerman, General Counsel
Epstein, Becker & Green, P.C.
1227 25th Street, N.W.
Washington, D.C. 20037-1156

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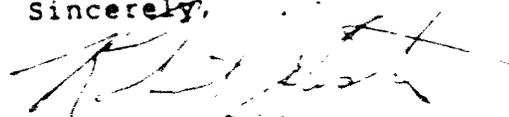
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Letter to Mr. Wilder
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Sincerely,



Robert J. Costa
Assistant Staff Director
Audit Division

Attachment as stated

CHRONOLOGY

WILDER FOR PRESIDENT COMMITTEE

Pre-audit Inventory Commenced	4/06/92
Audit Fieldwork	6/15/92-7/24/92
Interim Audit Report to the Committee	5/26/93
Response Received to the Interim Audit Report ^{1/}	12/13/93
Final Audit Report Approved	4/21/94

^{1/} Additional response time was granted after the revote and reissuance of the Interim Audit Report following the Courts decision in FEC v. NRA Political Victory Fund, et al., No. 91-5360, slip op. at 2 (D.C. Cir. Oct. 22, 1993).

Public Records

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FEDERAL ELECTION
COMMISSION
SECRETARY



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

APR 28 4 01 PM '95

April 28, 1995

MEMORANDUM

TO: The Commission

THROUGH: John C. Surina
Staff Director

FROM: Lawrence M. Noble
General Counsel

Kim Bright-Coleman
Associate General Counsel

Kenneth E. Kellner
Assistant General Counsel

James S. Portnoy
Attorney

SUBJECT: Wilder for President Committee
Proposed Final Repayment Determination and
Statement of Reasons (LRA #395)

On May 6, 1994, the Commission approved the Final Audit Report on the Wilder for President Committee ("the Committee") and made an initial determination that the Committee received \$19,032 in matching funds in excess of its entitlement. 26 U.S.C. § 9038(b)(1). The Commission also made an initial determination that the Committee incurred non-qualified campaign expenses totaling \$42,224, requiring a pro rata repayment of \$12,026. 26 U.S.C. § 9038(b)(2). Therefore, the Commission determined that the Committee must repay a total of \$31,058 to the United States Treasury. 26 U.S.C. § 9038(b).

On July 25, 1994, the Committee submitted its written response to the Commission's initial repayment determinations.^{1/} See 11 C.F.R. § 9038.2(c)(2). In a letter accompanying that response, the Committee requested the opportunity for counsel to make an oral presentation to the Commission. See 11 C.F.R.

^{1/} On June 9, 1994, the Commission granted the Committee's request for an extension of 45 days, until July 25, 1993, to respond to the Final Audit Report.

§ 9038.2(c)(3). On August 11, 1994, the Commission granted the Committee's request for an oral presentation. The oral presentation was held on October 5, 1994. On October 13, 1994, the Committee submitted additional evidential materials regarding matters addressed during the oral presentation.^{2/}

In its response to the Commission's initial repayment determinations, including the materials submitted following the oral presentation, the Committee has demonstrated that a lesser repayment is owed than the Commission initially determined. Specifically, the Committee incurred \$40,429 in non-qualified campaign expenses, requiring a pro rata repayment of \$11,515, and received \$10,223 in matching funds in excess of its entitlement. Therefore, we recommend that the Commission make a final repayment determination in the reduced amounts.

The Office of General Counsel has prepared a draft Statement of Reasons supporting a final determination by the Commission that the Committee must repay \$21,738 (\$11,515 + \$10,223) to the United States Treasury.

RECOMMENDATIONS

The Office of General Counsel recommends that the Commission:

1. Make a final determination that the Wilder for President Committee must repay \$11,515 to the United States Treasury pursuant to 26 U.S.C. § 9038(b)(1);
2. Make a final determination that the Wilder for President Committee must repay \$10,223 to the United States Treasury pursuant to 26 U.S.C. § 9038(b)(2);
3. Approve the Statement of Reasons supporting the Final Determination; and
4. Approve the appropriate letter.

Attachment Statement of Reasons

^{2/} On November 15, 1994, the Committee submitted additional materials pursuant to its "continuing obligation to provide [the Commission] with information which impacts on the Committee's NOCO Statement." These materials included, *inter alia*, "copies of the Committee's outstanding invoices as of [the date of the submission]" and "an estimate of the Committee's remaining legal, accounting and administrative termination expenses" Id. at 2.

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
L. Douglas Wilder and)
The Wilder for President)
Committee, Inc.)

STATEMENT OF REASONS

On , 1995, the Commission made a final determination that L. Douglas Wilder and Wilder for President Committee, Inc. ("the Committee") must repay \$21,738 to the United States Treasury. The Commission's determination was based on the Committee's receipt of matching payments in excess of entitlement and use of public funds to defray non-qualified campaign expenses. 26 U.S.C. §§ 9038(b)(1) and (2). See also 11 C.F.R. §§ 9038.2(b)(1) and (2). Therefore, the Committee is ordered to repay \$21,738 to the United States Treasury within 30 days of receipt of this determination. 11 C.F.R. § 9038.2(d)(2). This Statement of Reasons sets forth the legal and factual bases for the repayment determination. 11 C.F.R. § 9038.2(c)(4).

I. BACKGROUND

L. Douglas Wilder was a candidate for the Democratic presidential nomination in 1992. At the time, Mr. Wilder was Governor of the Commonwealth of Virginia. The Wilder for President Committee was Mr. Wilder's principal campaign committee.

The Committee received \$198,315 in public funds under the Matching Payment Act^{1/} for use in Mr. Wilder's presidential campaign. Following Mr. Wilder's withdrawal from the campaign on January 8, 1992, the Commission conducted an audit and examination of the Committee's receipts, disbursements and qualified campaign expenses, as provided in the Matching Payment Act and the Commission's regulations. 26 U.S.C. § 9038(a); 11 C.F.R. § 9038.1(a)(1).

Based upon information disclosed during the audit, the Commission approved an Interim Audit Report on the Committee on May 25, 1993. 11 C.F.R. § 9038.1(c)(1). The Interim Audit Report contained, inter alia, the Commission's preliminary calculations regarding future repayments by the Committee to the United States Treasury. See 11 C.F.R. § 9038.1(c)(1)(v).

The Committee responded to the Interim Audit Report on August 12, 1993.^{2/} See 11 C.F.R. § 9038.1(c)(2). In light of the decision in FEC v. NRA Political Victory Fund, 6 F.3d 821 (D.C. Cir. 1993), cert. dismissed for want of jurisdiction, 115 S. Ct. 537 (1994), on November 9, 1993, the Commission reconsidered and reapproved the Interim Audit Report. On December 13, 1993, the Committee submitted a supplemental response to the Interim Audit Report.

^{1/} "Matching Payment Act" refers to the Presidential Primary Matching Payment Account Act, 26 U.S.C. §§ 9031-9042. "FECA" refers to the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. §§ 431-455.

^{2/} On June 15, 1993, the Commission granted the Committee's request for an extension of 45 days, until August 12, 1993, to respond to the Interim Audit Report.

After considering the Committee's submissions in response to the Interim Audit Report, the Commission approved the Final Audit Report on May 6, 1994. See 11 C.F.R. §§ 9038.1(c)(3) and (d). In so doing, the Commission made two initial repayment determinations. First, the Commission made an initial determination that the Committee made non-qualified campaign expenditures totaling \$42,224, requiring a pro rata repayment of \$12,026. 26 U.S.C. § 9038(b)(2); 11 C.F.R. § 9038.2(b)(2). Second, the Commission made an initial determination that the Committee received \$19,032 in matching funds in excess of entitlement. 26 U.S.C. § 9038(b)(1); 11 C.F.R. § 9038.2(b)(1). In sum, therefore, the Commission determined that the Committee should repay a total of \$31,058 to the United States Treasury. 26 U.S.C. § 9038(b); 11 C.F.R. § 9038.2(c)(1).

The Committee disputed the Commission's initial repayment determinations in a written response submitted on July 25, 1994.^{3/} See 11 C.F.R. § 9038.2(c)(2). The Committee's response incorporated by reference its responses to the Interim Audit Report.

In a letter accompanying its response to the Final Audit Report, the Committee requested the opportunity for counsel to make an oral presentation to the Commission. See 11 C.F.R. § 9038.2(c)(3). On August 11, 1994, the Commission granted the Committee's request for an oral presentation.

^{3/} On June 9, 1994, the Commission granted the Committee's request for an extension of 45 days, until July 25, 1994, to respond to the initial repayment determination.

The oral presentation was held on October 5, 1994. On October 13, 1994, the Committee submitted additional evidential materials regarding matters addressed during the oral presentation.^{4/}

The Commission considered all materials provided to it by the Committee during the audit and in response to the Interim Audit Report and the Final Audit Report, including the materials submitted following the oral presentation, in reaching the final repayment determination.

II. DETERMINATION OF NET OUTSTANDING CAMPAIGN OBLIGATIONS

Within fifteen days after his date of ineligibility, a candidate must provide the Commission with a statement of net outstanding campaign obligations ("NOCO statement") including, inter alia, the total of all outstanding obligations for qualified campaign expenses and an estimate of winding down costs. 11 C.F.R. § 9034.5(a). The total of all outstanding campaign obligations shall not include accounts payable for non-qualified campaign expenses. 11 C.F.R. § 9034.5(b). The candidate bears the burden of documenting disbursements and proving that disbursements constitute qualified campaign expenditures. 11 C.F.R. § 9033.11.

^{4/} On November 15, 1994, the Committee submitted additional materials pursuant to its "continuing obligation to provide [the Commission] with information which impacts on the Committee's NOCO Statement." Attachment 2 at 1. These materials included, inter alia, "copies of the Committee's outstanding invoices as of [the date of the submission]" and "an estimate of the Committee's remaining legal, accounting and administrative termination expenses" Id. at 2.

In its response to the Final Audit Report, the Committee challenged the capital assets entry on its NOCO statement. See Attachment 6 at 124. Specifically, the Committee challenged the categorization of three prepaid computer equipment leases as capital assets and also disputed the value the Commission assigned to those assets. Id. Subsequently, at the oral presentation, the Committee conceded that the computer equipment constituted a capital asset, but reiterated its objection to the Commission's valuation of the equipment. Attachment 4 at 11-14. The Committee explained that it had transferred much of the computer equipment to a former Committee employee as compensation, and urged the Commission to adopt a single valuation for the equipment upon acquisition and disposition.^{5/}

Commission regulations state that capital assets acquired after a candidate's date of ineligibility are valued at their fair market value on the date acquired. 11 C.F.R. § 9034.5(c)(1). The Committee acquired the computer equipment on January 29, 1992, the date it bought out the leases. See Attachment 1 at 4. Because the buyout took place after Mr.

^{5/} The Committee apparently transferred three computers and a printer to the former employee. The Committee initially advised the Commission that it transferred two computers to the former employee, but later corrected that statement. Attachment 2 at 1.

Wilder's date of ineligibility, the equipment must be valued at its fair market value on the date acquired.^{6/}

The fair market value of the equipment on the date of acquisition was \$15,452, the amount the Committee paid to acquire the equipment. Specifically, on January 29, 1992, the Committee made payments totaling \$12,696 to Fairfax Computer Products. These payments comprised two prepaid lease payments totaling \$5,758 and a lease buyout payment of \$6,938. In addition, at the beginning of the lease, on October 25, 1991, the Committee made a payment to Fairfax Computer Products which included a \$2,755 prepayment for the final lease payment. Id. All these payments were necessary for the Committee to purchase the computer equipment; consequently, the Committee paid \$15,452 to acquire the equipment. This amount therefore represents the fair market value of the computer equipment on January 8, 1992, and, under 11 C.F.R. § 9034.5(c)(1), must be the value assigned to the equipment on the Committee's NOCO statement.

While the NOCO statement in the Final Audit Report included the computer lease prepayments in valuing the equipment upon acquisition, it excluded them in valuing the equipment upon disposition. In effect, therefore, the NOCO statement continued to show the lease prepayments as assets, even though the Committee no longer possessed the computer

^{6/} Mr. Wilder ended his campaign for the Democratic presidential nomination on January 8, 1992. As such, January 8, 1992 is Mr. Wilder's date of ineligibility. 11 C.F.R. § 9033.5(a).

equipment associated with those prepayments. This caused the Committee to have an asset on its NOCO statement that it could not eliminate.

The value of the computer equipment did not change materially between the time the Committee acquired the equipment and the time that the Committee disposed of the equipment. Therefore, the Committee is correct that the computer equipment should have the same value upon acquisition and disposition. As such, the computer equipment has been assigned a value of \$15,452 for disposition purposes, and the accounts payable entry on the obligations side of the NOCO statement has been adjusted commensurately to state that the Committee transferred computer equipment valued at \$12,207.^{7/}

As discussed in Section IV, infra, the foregoing adjustment in the valuation of the computer equipment upon disposition will reduce the assets on the Committee's NOCO statement and, thereby, will reduce the Committee's repayment obligation for receipt of matching funds in excess of entitlement. 26 U.S.C. § 9038(b)(1); 11 C.F.R. § 9038.2(b)(1).

III. NON-QUALIFIED CAMPAIGN EXPENSES

A candidate bears the burden of documenting disbursements and proving that they constitute qualified campaign expenditures. 11 C.F.R. § 9033.11. If the Commission determines that a candidate used any part of a matching fund payment for a purpose other than a qualified campaign expense,

^{7/} The Committee apparently retains one computer valued at \$3,245.

the candidate shall be required to repay to the Treasury the portion of the non-qualified expense that represents the matching fund payment. 26 U.S.C. § 9038(b)(2)(A). The amount of the repayment shall bear the same ratio to the total amount of the non-qualified campaign expenses as the amount of matching funds certified bears to the total amount of deposits of contributions and matching funds, as of the candidate's date of ineligibility. 11 C.F.R. § 9038.2(b)(2)(iii).

The Wilder Committee was certified to receive \$198,315 in matching funds through Mr. Wilder's date of ineligibility. The Committee's total deposits other than matching funds were \$497,969. To determine the Committee's repayment ratio, the Commission divided the matching funds certified (\$198,315) by the total deposits plus total matching funds certified ($\$198,315 + \$497,969 = \$696,284$). Thus, the Wilder Committee's repayment ratio for non-qualified campaign expenses is .284819 or 28.4819% ($\$198,315/\$696,284$). See Attachment 7 at 30.

The Final Audit Report identified four categories of non-qualified campaign expenses incurred by the Committee: (1) improper severance payments to Committee employees; (2) questionable salary payments to members of Mr. Wilder's official staff; (3) miscellaneous undocumented disbursements; and (4) a payment to the Commonwealth for the use of a state-owned airplane in connection with a vacation taken by Mr. Wilder. These non-qualified campaign expenses totaled \$42,224. Accordingly, based on a repayment ratio of 28.4819%, the Commission made an initial determination that the Committee

should repay the Treasury \$12,026. 26 U.S.C. § 9038(b)(2); 11 C.F.R. § 9038.2(b)(2). Attachment 7 at 37.

The Committee disputed the Commission's initial repayment determination regarding non-qualified campaign expenses. For the reasons stated herein, the Commission finds that the Committee actually incurred \$40,429 in non-qualified campaign expenses. As a consequence, the Commission has made a final determination that the Committee must repay \$11,515 to the U.S. Treasury.

a. Severance Payments

On January 29 and 30, 1992, the Committee made lump sum compensation payments to eleven individuals who served as consultants to the campaign. The payments ranged from \$800 to \$2,000 and totaled \$15,300.^{8/} The checks representing the payments bear the notation "severance" on their memorandum lines. Moreover, the payments were made approximately three weeks after Mr. Wilder concluded his campaign. In the Interim Audit Report, the Commission characterized the payments as severance payments and determined that the Committee had not demonstrated that they were qualified campaign expenses. Attachment 10 at 21. Accordingly, the Commission recommended that the Committee "submit documentation which demonstrates that the [severance payments] are qualified campaign expenses." Id. at 22.

^{8/} The individuals who received payments and the amount of their payments are listed in Attachment 7 to the Final Audit Report. See Attachment 7 at 48.

In its response to the Interim Audit Report, the Committee argued that the payments were "legitimate and reasonable winding-down expenditures." See Attachment 9 at 7. In this regard, the Committee noted that Mr. Wilder's withdrawal from the race came suddenly and unexpectedly, and asserted that the consultants were paid to ensure that the Committee had adequate personnel available to conclude its operations. Id. More specifically, the Committee stated that the consultants were compensated "to help the Committee, on an as needed basis, with close-down activities and with obtaining and compiling information and documentation for the FEC audit." Id. Finally, the Committee asserted that "unrestricted severance payments of approximately one month's salary" should per se be considered qualified campaign expenses. Id. at 8.

Notwithstanding the Commission's request in the Interim Audit Report, however, the Committee did not submit any documentation or other evidence to demonstrate that the payments were qualified campaign expenses. Therefore, the Commission determined in the Final Audit Report that the Committee had not demonstrated that the severance payments were qualified campaign expenditures. Attachment 7 at 32.

The Committee did not submit any further evidence with respect to this matter in response to the Final Audit Report. At the oral presentation, however, the Committee challenged the Commission's determination by asserting that the severance payments were "close-down" expenses that the Committee had "wide discretion" to make, and that the payments were

"reasonable" compensation to Committee employees who lost their incomes upon Mr. Wilder's abrupt withdrawal from the campaign. Attachment 4 at 10.

Properly documented, reasonable severance payments may be qualified campaign expenses. See Final Audit Report on Friends of Gary Hart -- 1988. Here, however, the Committee did not provide evidence sufficient to demonstrate that the payments were qualified campaign expenses. 11 C.F.R. § 9033.11.

As a preliminary matter, the Committee did not provide employment agreements or other documentation establishing that the consultants were entitled to severance payments. Attachment 7 at 31. In fact, at the oral presentation, counsel conceded that no written agreements exist.^{9/} Attachment 4 at 17. The Committee also had no record whether the consultants performed wind-down services in return for the payments they received. Id. at 20. The lack of contemporaneous documentation is significant because the Committee could not demonstrate why the compensated employees received the purported severance payments. In fact, the Committee could not even identify the campaign officials who authorized the

^{9/} Although a contemporaneous written agreement stating that an employee will receive severance pay is not a prerequisite to demonstrating that a severance payment is a qualified campaign expense, the existence of such an agreement is evidence of an employee's entitlement to a severance payment, if not the reasonableness of the payment.

payments. Id. at 20, 22-23.^{10/} In the absence of such proof, the payments must be considered non-qualified campaign expenses. 11 C.F.R. § 9033.11.^{11/}

Although counsel for the Committee indicated during the oral presentation that she would procure an affidavit from the campaign manager to redress the foregoing evidentiary deficiencies, Attachment 4 at 37, the Committee did not submit any further evidence pertaining to the severance payments. The record before the Commission therefore is the same as it was when the Commission made the initial repayment determination and concluded that the Committee had not demonstrated that the severance payments were qualified campaign expenses. 11 C.F.R. § 9033.11. As such, there is no basis for the Commission to change its determination that the payments in issue constitute

^{10/} For example, counsel stated that the campaign manager, Joe Johnson, "was involved with these decisions." She "believe[d]" that a campaign consultant, Paul Goldman, might have been involved. Counsel was "not sure" whether the campaign treasurer or Mr. Wilder were involved in the decisionmaking. Attachment 4 at 22-23.

^{11/} Although the Committee claimed that the severance payments were "reasonable" in amount, the record does not support that assertion. The only proffer the Committee made with respect to the severance payments was counsel's statement that the payments were reasonable and within the Committee's discretion. See Attachment 4 at 10. However, arguments from counsel are not evidence, and thus do not satisfy 11 C.F.R. § 9033.11. See cf. Scherer v. Rockwell Int'l Corp., 975 F.2d 356, 361 (7th Cir. 1992)(statements of counsel are not evidence for purposes of deciding summary judgment motion). Moreover, even if the amounts were reasonable, a bonus or severance payment is not a qualified campaign expense merely because it is reasonable in amount. Committee expenditures -- including severance and bonus payments -- must satisfy all the elements of 26 U.S.C. § 9032(9) in order to be qualified campaign expenses.

change its determination that the payments in issue constitute non-qualified campaign expenses.^{12/}

b. Questionable Salary Payments

According to a list of payments prepared by the Committee, two members of Mr. Wilder's staff, Ruth M. Jones and William M. Keough, Jr.^{13/}, performed consulting services for the Committee during the period from April 1, 1991 to January 31, 1992 (the date on which the list was prepared). Attachment 7 at 32. On January 29, 1992, the Committee made payments totaling \$15,000 to Ms. Jones and Mr. Keough. Specifically, Ms. Jones received \$10,000 and Mr. Keough received \$5,000. Id. In the Interim Audit Report and the Final Audit Report, the Commission determined that, based on the available documentation, the Committee had not proven that the payments to Ms. Jones and Mr. Keough constituted qualified campaign expenses. The Committee still has not provided the necessary proof. Therefore, the

^{12/} The Committee correctly noted that the Commission has recognized payments to the consultants after February 1, 1992 as qualified campaign expenses. Attachment 9 at 7 n.2. This does not establish, however, that every payment to these individuals would be a qualified campaign expense. Payroll records show that six of the consultants continued working for the Committee after receiving their "severance" payments, and that four of those individuals were compensated by the Committee through June 1992. Attachment 7 at 32. This conflicts with the Committee's claim that the consultants received severance payments, which connote that the recipient's employment has terminated. See Brooks v. Burlington Industries, Inc., 477 U.S. 901 (1986); Sejman v. Warner-Lambert Co., 889 F.2d 1346, 1349-50 (4th Cir. 1990). Consequently, the continued paid employment of the individuals is inconsistent with the Committee's claim that the payments represent severance benefits.

^{13/} Ms. Jones was the Governor's personal secretary, and Mr. Keough served as his Deputy Director of Constituent Affairs.

Commission has determined that the payments to Ms. Jones and Mr. Keough are non-qualified campaign expenses.

Questions regarding the payments to Ms. Jones and Mr. Keough first arose at the exit conference. At that time, the Audit staff advised the Committee that a \$15,000 entry on the Committee's NOCO statement for accounting fees to wind down the Committee's affairs might not be considered a permissible winding down expense absent evidence that the services were reasonable and necessary. Attachment 5 at 4-5. Counsel for the Committee defended the expenditure by indicating that Ms. Jones and Mr. Keough already had performed the accounting duties and received the payment. Id. The Audit staff requested that the Committee provide evidence to support its assertion. The Committee, however, did not provide the evidence. Accordingly, in the Interim Audit Report, the Commission determined that the payments were non-qualified campaign expenses. Attachment 10 at 22.

In response to the Interim Audit Report, the Committee submitted a memorandum from Ms. Jones dated August 11, 1993 stating that she had served as a consultant to the Committee since April 1, 1991. Attachment 9 at 16-17. In particular, Ms. Jones stated that she managed Committee funds, paid Committee bills, assisted with FEC compliance matters, and helped organize political events and fundraisers. Id. at 16. Ms. Jones further stated that while she "charged the Committee \$16,300 for [her] services from approximately April 1, 1991 through May 31, 1992," she had not charged the Committee for

the time she spent on Committee business from June 1, 1992 forward. Id.

The Committee also submitted a memorandum from Mr. Keough in response to the Interim Audit Report. Attachment 9 at 15. The memorandum, which was similar to the memorandum submitted by Ms. Jones, detailed Mr. Keough's services for the Committee from April 1991 through August 1993. Id. Mr. Keough further stated that he accepted \$5,000 in payment for services rendered through January 1992. Id.

The Committee argued that the memoranda "clearly support" the fees paid to Ms. Jones and Mr. Keough; however, it did not explain why. Attachment 9 at 10. Although the memoranda established that Ms. Jones and Mr. Keough performed services for the Committee, they did not establish that the payments constitute qualified campaign expenses.

As a preliminary matter, the memoranda state that the payments were compensation for services performed from April 1991 to January 1992. However, that assertion conflicts with the Committee's initial characterization of the payments as wind-down costs. Also, the Committee's claim that the payments were compensation for services rendered before Mr. Wilder's withdrawal from the campaign in January 1992 is inconsistent with the history of payments to Ms. Jones and Mr. Keough.

Ms. Jones received small periodic payments while Mr. Wilder was an active candidate. Specifically, she received \$2,400 in consulting fees between September 1, 1991 and January 21, 1992. Following Mr. Wilder's withdrawal from the

race, Ms. Jones billed the Committee \$4,000 for services rendered between February 1992 and May 1992. The Committee paid that bill on May 29, 1992. The evidence thus suggests that Ms. Jones was compensated fully for her services between September 1991 and May 1992.

Notwithstanding the foregoing, three weeks after Mr. Wilder's withdrawal from the campaign, on January 29, 1992, the Committee paid Ms. Jones the \$10,000 that is in issue here. Although the Committee contends that the \$10,000 was also for services rendered, the record does not support the Committee's claim. There is no evidence that Ms. Jones ever billed the Committee this amount. Attachment 7 at 33. The other payments to Ms. Jones were for substantially smaller amounts. Nor is there any evidence that she performed additional services for which she was compensated.

A similar analysis applies with respect to the \$5,000 payment to Mr. Keough. Mr. Keough never billed the Committee for the services that he performed. Attachment 7 at 34. Nor is there any evidence that the Committee made payments to Mr. Keough prior to Mr. Wilder's withdrawal from the campaign. In sum, then, Mr. Keough neither billed the Committee nor received any compensation while Mr. Wilder was an active candidate, but received a \$5,000 payment three weeks after his withdrawal. As with Ms. Jones, the lack of contemporaneous documentation, coupled with the fact that no payments were made to Mr. Keough prior to Mr. Wilder's withdrawal from the campaign, undermines

the Committee's assertion that Mr. Keough was paid for services rendered prior to Mr. Wilder's date of ineligibility.

In light of the foregoing, the Commission determined in the Final Audit Report that the Committee had not met its burden of demonstrating that the payments to Ms. Jones and Mr. Keough were qualified campaign expenses. See Attachment 7 at 33-34.

In response to the Final Audit Report, the Committee denied that it had previously characterized the payments to Ms. Jones and Mr. Keough as payments for accounting services relating to winding down the Committee's affairs. Attachment 6 at 123. In addition, the Committee resubmitted Mr. Keough's memorandum and also submitted various documents indicating that Mr. Keough performed services for the Committee throughout the campaign. Id. Accordingly, the Committee argued that the payments should be considered qualified campaign expenses.

At the oral presentation, counsel for the Committee acknowledged that the irregular billing practices of Ms. Jones and Mr. Keough caused uncertainty as to the purpose underlying the payments to them. Attachment 4 at 15. Counsel asserted, however, that the payments should be considered qualified campaign expenses because the Committee had demonstrated that the total compensation paid to Ms. Jones and Mr. Keough was reasonable. Id. at 21.

There is no dispute that Ms. Jones and Mr. Keough performed services for the Committee; nor is the total compensation they received per se unreasonable. However,

disbursements do not constitute qualified campaign expenses simply because they are reasonable; the payments also must have been made "to further [Mr. Wilder's] election" as president. 26 U.S.C. § 9002(11); see also 11 C.F.R. § 9032.9. Moreover, the committee bears the burden of demonstrating that disbursements were for qualified campaign expenses. 11 C.F.R. § 9033.11.

Here, the Committee has not established the nature of the payments to Ms. Jones and Mr. Keough. The record is devoid of contemporaneous invoices, bills or employment agreements relating to the services performed and the payments received by Ms. Jones and Mr. Keough.^{14/} The lack of evidence is exacerbated by the Committee's inconsistent characterization of the payments. Also, the payment history to Ms. Jones and Mr. Keough appears to conflict with the Committee's contention that the payments in issue were for services rendered between April 1991 and January 1992. Consequently, the Commission has determined that the Committee has not met its burden of proving that the payments to Ms. Jones and Mr. Keough constitute qualified campaign expenditures. 11 C.F.R. § 9033.11.

c. Undocumented Disbursements

Commission regulations require presidential committees to document disbursements in excess of \$200 and prescribe the

^{14/} The lack of contemporaneous documentation is particularly problematic because Ms. Jones and Mr. Keough apparently decided unilaterally how much the Committee would pay them, then authorized the payments on behalf of the Committee, and prepared and signed the Committee checks. Attachment 4 at 23-24.

types of documentation that will satisfy this requirement. 11 C.F.R. §§ 9033.11(b)(i)-(iv). In the Final Audit Report, the Commission identified five payments totaling \$6,325 that the Committee failed to document adequately. Moreover, because the Committee failed to make necessary supporting documentation available to the Audit staff, the Commission could not determine whether the disbursements were campaign-related. As noted previously, the Committee bears the burden of demonstrating that its disbursements are qualified campaign expenditures. 11 C.F.R. § 9033.11. Consequently, the undocumented disbursements were treated as non-qualified campaign expenditures.

The Committee did not submit any documentation concerning the five payments identified in the Final Audit Report. As such, the Committee did not meet its burden of demonstrating that these payments were campaign-related. In the absence of such proof, the Commission has determined that the expenditures are non-qualified campaign expenses.

d. Use of State Plane

Throughout the campaign, Mr. Wilder used an airplane owned by the Commonwealth of Virginia for campaign-related travel. The Committee reimbursed the Commonwealth for these trips at the rate of \$625 per hour plus certain expenses. Included among the trips for which the Committee reimbursed the Commonwealth were round trips between Richmond, Virginia and New York City, on July 14, 1991 and July 21, 1991.

Specifically, the Committee paid the Commonwealth \$1,385 for the July 14, 1991 trip and \$1,400 for the July 21, 1991 trip.

In the Interim Audit Report, the Commission determined that the Committee underpaid the Commonwealth for these trips, among others. In response, the Committee stated that the July 14, 1991 trip and the July 21, 1991 trip were not campaign-related. See Attachment 9 at 36. Rather, the Commonwealth's plane was used to transport Mr. Wilder to Kennedy Airport in New York, where he boarded a commercial flight for a vacation in Switzerland, and to pick him up at Kennedy Airport upon his return. Id. at 41.

In light of the foregoing, the Commission determined in the Final Audit Report that Mr. Wilder's trip to New York was not campaign-related. Attachment 7 at 19. Therefore, the expenses entailed in transporting Governor Wilder to New York on the Commonwealth's plane were non-qualified campaign expenses totaling \$2,785.

At the oral presentation, the Committee advised the Commission that Mr. Wilder would personally reimburse the Committee \$2,785, representing the amount that the Committee had paid the Commonwealth for these trips. Attachment 4 at 6. The Committee has submitted evidence of this reimbursement. See Attachment 1 at 2. Therefore, these expenditures no longer constitute non-qualified campaign expenses.

e. Additional Non-Qualified Campaign Expenses

As noted infra, documentation submitted by the Committee has resulted in an increase in the Committee's entitlement to

matching funds as of Mr. Wilder's date of ineligibility. See Section IV. Consequently, the period during which matching funds remained in the Committee's account was extended from March 11, 1992 to April 7, 1992. See Attachment 1 at 2.

In the Final Audit Report, the Commission identified expenditures that the Committee had failed to document, but that did not give rise to repayment obligations because the Committee apparently incurred the expenditures after it had expended all the matching funds in its account. Attachment 7 at 47.^{15/} However, in light of the increase in the Committee's matching funds entitlement, it now appears that two of the undocumented expenditures, totaling \$990, were incurred while the Committee's account still contained matching funds. Accordingly, the Commission has determined that the undocumented expenditures constitute non-qualified campaign expenses, as provided in 11 C.F.R. § 9033.11.

IV. MATCHING FUNDS RECEIVED IN EXCESS OF ENTITLEMENT

The Commission made an initial determination that the Committee received \$19,032 in matching funds in excess of entitlement. The Committee contested this determination. For the reasons stated herein, based on a review of the Committee's response to the initial repayment determination, the Commission has reduced the amount that the Committee must repay to the Treasury for matching funds received in excess of entitlement from \$19,032 to \$10,223.

^{15/} The Committee did not address this portion of the Final Audit Report in its response.

If the Commission determines that a candidate has received matching funds in excess of the aggregate amount of payments to which the candidate was entitled, the candidate must repay the excess matching funds to the U.S. Treasury. 26 U.S.C. § 9038(b)(1). If, on his date of ineligibility, a candidate has net outstanding campaign obligations, he may receive matching payments for contributions received through December 31 of the election year, until the sum of contributions and matching funds received by the candidate equals the candidate's net outstanding campaign obligations. 11 C.F.R. § 9034.1(b).

The Wilder Committee received \$289,027 in matching funds, including \$198,315 certified prior to January 8, 1992, Mr. Wilder's date of ineligibility, and \$90,711 received on February 4, 1992, after his withdrawal from the campaign.^{16/} Attachment 7 at 2. In the Final Audit Report, the Commission calculated that the Committee had a net deficit of \$73,439 on the date of ineligibility. Id. at 28. Based upon that net deficit on the date of ineligibility and the contributions received thereafter, the Committee was entitled to only \$71,679 of the \$90,711 payment it received on February 4, 1992. Accordingly, the Commission made an initial determination that the Committee received \$19,032 in matching funds in excess of entitlement. Id. at 38.

The Committee contested this determination insofar as it concerned a \$2,392 payment to Ron Lester on April 15, 1992.

^{16/} These sums due not add up exactly because they are rounded off to the nearest dollar.

Attachment 6 at 4. In particular, the Committee objected to the Audit staff's characterization of the payment as a non-qualified campaign expense. The Committee asserted that the payment represented reimbursement of expenses that Mr. Lester incurred while traveling to Las Vegas with Mr. Wilder in November and December 1991, and provided documentation to support its contention, including Mr. Lester's declaration. Id. Based on the materials provided by the Committee, the payment to Mr. Lester has been documented. The Commission, therefore, has determined that the payment to Mr. Lester constitutes a qualified campaign expense.

In addition, the Commission determined in the Final Audit Report that the Committee had not demonstrated that \$457 in payments it made to Federal Express represented qualified campaign expenses. Based on the Committee's response to the Final Audit Report, the Commission has concluded that the Committee has documented those payments, that the payments should be classified as qualified campaign expenses, and thus should be included in the Committee's NOCO statement as accounts payable for qualified campaign expenses. Attachment 5 at 5.^{17/}

^{17/} Because these payments were made after the Committee ceased to receive matching funds, they were not included in the Commission's determination regarding non-qualified campaign expenditures made with matching funds, and did not give rise to a repayment obligation in the Final Audit Report. Even so, the characterization of the payments as non-qualified meant that they did not appear in the accounts payable entry in the Committee's NOCO statement, and thus did not count as obligations that could give rise to matching fund entitlement.

Finally, as discussed previously, the accounts payable in the Committee's NOCO statement has been modified to reflect an increase in the value assigned to the computer equipment that the Committee transferred to an employee as compensation.

In light of the foregoing and other disbursements made between January 9, 1992 and September 30, 1994, the Committee's NOCO statement has been revised to indicate a net deficit position, on the date of ineligibility, of \$82,248. Also, the amount of matching funds the Committee was entitled to receive has been revised to \$80,488.^{18/} Based on these revisions, the amount of matching funds in excess of entitlement that the Committee received has been reduced commensurately, to \$10,223. As such, the Commission makes the final determination that the Committee must make a repayment in that amount for matching payments received in excess of entitlement.

V. CONCLUSION

For the foregoing reasons, the Commission makes the final determination that the Committee made non-qualified campaign expenses totaling \$40,429, and must make a repayment to the United States Treasury in the amount of \$11,515 ($\$40,429 \times .284819$). Further, the Commission makes the final determination that the Committee received \$10,223 in matching funds payments in excess of its entitlement, and must make a repayment to the

^{18/} This amount equals \$82,248, the Committee's net deficit, less \$1,760, the total amount of private contributions that the Committee received between January 9, 1992, the first day after Mr. Wilder's date of ineligibility, and February 4, 1992, the date the Committee received its final matching fund payment.

United States Treasury in the amount of \$10,223. In sum, the Commission makes the final determination that the Committee must make a repayment to the United States Treasury in the amount of \$21,738.

Attachments

1. Audit Division's Analysis of Additional Documentation Submitted by Committee (January 5, 1995)
2. Committee's Submission Pertaining to Adjustments to NOCO Statement (November 15, 1994)
3. Committee's Post Oral Presentation Submission of Written Materials (October 13, 1994)
4. Transcript of Oral Presentation (October 5, 1994)
5. Audit Division's Analysis of Committee's Response to the Final Audit Report (September 21, 1994)
6. Committee's Response to the Final Audit Report (July 25, 1994)
7. Final Audit Report, approved May 6, 1994
8. Committee's Supplemental Response to Interim Audit Report (December 13, 1993)
9. Committee's Response to Interim Audit Report (August 12, 1993)(Attachments Omitted in Part)
10. Interim Audit Report, approved May 25, 1993 and November 9, 1993

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
AK005847



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

JAN 5 1 51 PM '95

January 5, 1995

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

THROUGH: JOHN C. SURINA *Chw for GCS*
STAFF DIRECTOR

FROM: ROBERT J. COSTA *Rh For R.J.C. 1/5/95*
ASSISTANT STAFF DIRECTOR
AUDIT DIVISION

SUBJECT: WILDER FOR PRESIDENT COMMITTEE, INC. - ADDITIONAL
DOCUMENTATION

On November 15, 1994, the Committee submitted additional documentation pertaining to its NOCO statement. Your office forwarded the documentation for our review on November 18, 1994.

Based on our review, adjustments have been made to certain findings: III.A. Determination of Net Outstanding Campaign Obligations, III.C. Apparent Non-Qualified Campaign Expenses, and III.D. Matching Funds Received in Excess of Entitlement, as presented in a memorandum forwarded to your office on September 21, 1994.

Our analysis is detailed below.

1. Finding III.A. - Determination of Net Outstanding Campaign Obligations

Based on the documentation made available for review, the Audit staff has adjusted the NOCO statement. The revised NOCO statement indicates a deficit position of \$82,248. See Attachment 1.

It should be noted that the Audit staff re-examined our valuation of capital assets. It remains our opinion that the value of the Committee's capital assets on January 8, 1992 is \$15,452. However, additional documentation made available for review indicates that the campaign manager, Joe Johnson, received additional assets as payment for services rendered. This adjustment has been made.

2. Finding III.C. - Apparent Non-Qualified Campaign Expenses

The additional documentation submitted by the Committee results in an increase in remaining entitlement as of the date of ineligibility (see 3 below). As a result, the period during which matching funds were in Committee accounts was extended from March 11, 1992 to April 7, 1992. During this period, the Audit staff identified two additional non-qualified campaign expenses totaling \$990. These expenses were originally included in Attachment 6 to the final audit report.

In addition, Governor Wilder reimbursed the Committee \$2,785, which represented the value of trips made on the Commonwealth's plane that were not campaign-related. This amount was originally classified as a non-qualified campaign expense and included in the calculation of the pro-rata repayment due the United States Treasury (\$12,026). The Audit staff has deducted the amount from the non-qualified campaign expenses subject to a pro-rata repayment.

Consequently, the amount of the pro-rata repayment now due to the United States Treasury has decreased from \$12,026 to \$11,515 ($\$40,429 \times .284819$).

3. Finding III.D. - Matching Funds Received in Excess of Entitlement

The Committee's revised NOCO statement indicates a deficit position of \$82,248. Therefore, the Candidate was entitled to \$80,488 (\$82,248 less \$1,760 in private contributions received 1/09/92 through 2/04/92) of the \$90,711 matching fund payment received on February 4, 1992.

As a result, the Candidate's receipt of matching funds in excess of the amount to which he was entitled is now \$10,223.

4. Repayment Recap

The amount repayable to the U.S. Treasury pursuant to 26 U.S.C. §§9038(b)(1) and (2) is:

1. Apparent Non-Qualified Campaign Expenses (Finding III.C.)	\$11,515
2. Matching Funds Received in Excess of Entitlement (Finding III.D.)	<u>10,223</u>
Repayment Amount	<u>\$21,738</u>

A revised NOCO statement and recap of matching funds received in excess of entitlement can be found at Attachment 1. Should you have any questions, please contact Brian Dehoff or Tom Nurthen at 219-3720.

Attachment:
Statement of Net Outstanding Campaign Obligations

Wilder for President Committee, Inc.

Statement of Net Outstanding Campaign Obligations

January 8, 1992

Audit Analysis

Assets:

Cash in Bank	336,977	
Accounts Receivable	23,113 <u>a/</u>	
Capital Assets	<u>15,452</u>	
Total Assets:		\$375,542

Obligations:

Accounts Payable for Qualified Campaign Expenses at 1/08/92	259,004 <u>b/</u>	
Amount due the Commonwealth of Virginia	<u>30,848</u> <u>c/</u>	
Winding down Costs (Based on actual disbursements 1/09/92 - 9/30/94)		
Salaries/Consulting Fees (including pre-eligibility commitments)	60,144	
Fundraising Costs	1,257	
Legal Fees and Expenses	91,579	
Rent	3,588	
Administrative Costs (phone, supplies, furniture rental, etc.)	1,646	
Accounting Expenses	640	
Amount due U.S. Treasury	<u>9,084</u>	
Total Obligations:		<u>\$457,790</u>

Net Outstanding Campaign Obligations: (Deficit)

(\$82,248)

Matching Funds Received in Excess of Entitlement

Deficit as of January 8, 1992		(\$82,248)
Less: Private Contributions (Received 1/09/92 - 2/04/92)		<u>1,760</u>
Remaining Entitlement as of 2/04/92		<u>\$80,488</u>
Matching Fund Payment (2/04/92)		<u>\$90,711</u>
Less: Remaining Entitlement as of 2/04/92		<u>\$80,488</u>
Matching Funds Received in Excess of Entitlement		<u>\$10,223</u>

Footnotes to NOCO:

a/ This amount represents refunds and rebates received/deposited by the Committee from January 9, 1992 to September 30, 1994 (\$20,328) and a reimbursement from Governor Wilder received October 5, 1994 (\$2,785). See discussion at page 2.

b/ This amount is based on actual disbursements from January 9, 1992 through September 30, 1994. Also included is the value of the computer equipment given to Joe Johnson as compensation for services rendered (\$12,207). The value of capital assets not yet liquidated is \$3,245.

c/ Any decrease to this amount will result in an increase in the amount of matching funds received in excess of the candidate's entitlement.

Nov 15 4 21 PM '94

EPSTEIN BECKER & GREEN, P.C.

ATTORNEYS AT LAW
1227 25TH STREET, N.W.
WASHINGTON, D.C. 20037-1156

(202) 861-0900

TELECOPIER (202) 296-2882

DIRECT LINE

290 PARR AVENUE
NEW YORK, NEW YORK 10177-0077
(212) 381-4500

1875 CENTURY PARK EAST
LOS ANGELES, CALIFORNIA 90067-2501
(310) 556-8861

876 LANDMARK SQUARE
STANFORD, CONNECTICUT 06901-2704
(203) 348-3737

ONE RIVERFRONT PLAZA
NEWARK, NEW JERSEY 07102-8401
(201) 842-1900

78 STATE STREET
BOSTON, MASSACHUSETTS 02109
(617) 342-4000

2 EMBARCADERO
SAN FRANCISCO, CALIFORNIA 94111-8994
(415) 398-3500

12750 MERIT DRIVE
DALLAS, TEXAS 75281-1209
(214) 490-3143

118 SOUTH MONROE STREET
TALLAHASSEE, FLORIDA 32301-1530
(904) 681-0596

2400 SOUTH DIXIE HIGHWAY, SUITE 100
MIAMI, FLORIDA 33133
(305) 856-1100

810 KING STREET, SUITE 301
ALEXANDRIA, VIRGINIA 22314-3132
(703) 884-1204

November 15, 1994

P.C. NEW YORK, WASHINGTON, D.C., NEW JERSEY,
CONNECTICUT, VIRGINIA AND TEXAS ONLY

HAND-DELIVERED

James S. Portnoy, Esquire
Office of the General Counsel
Federal Election Commission
999 E Street, N.W.
Room 657
Washington, DC 20463

**RE: WILDER FOR PRESIDENT COMMITTEE: ADJUSTMENTS TO NOCO
STATEMENT**

Dear Mr. Portnoy:

I am writing to you in connection with the Wilder for President Committee's continuing obligation to provide your office with information which impacts on the Committee's NOCO Statement.

Specifically, enclosed please find copies of the Committee's bank statements covering the period of July 30, 1993 through October 31, 1994 (it is our understanding that the October, 1994 statement was requested by the Audit Division in connection with Governor Wilder's \$2,785 reimbursement to the Committee).

Also enclosed is a list of all disbursements made by the Committee from August 13, 1993 through October 31, 1994, with check copies and documentation attached (disbursements through September 30, 1994 have been previously disclosed on the Committee's quarterly FEC reports).

ATTACHMENT 2
Page 1 of 77

James S. Portnoy, Esquire
November 15, 1994
Page Two

Further, enclosed are copies of the Committee's outstanding invoices as of today: a \$2,337.50 invoice from Nicholas Perrins (covering work performed from April 1, 1994 through November 9, 1994) and a \$6,350.27 invoice from Elliott & Zweben, P.C. These outstanding invoices total \$8,687.77.

In addition, the following is an estimate of the Committee's remaining legal, accounting and administrative termination expenses:

A. Legal Fees & Disbursements

\$1,250 per month (on average) multiplied by 5 months = \$6,250.00

B. Fees to Nicholas Perrins

5 hours per month (on average) multiplied by \$25 per hour multiplied by 5 months = \$ 625.00

C. Administrative Costs

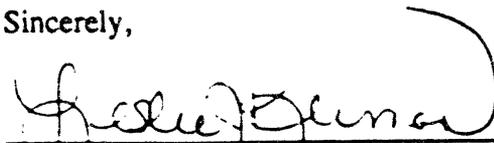
\$20 per month (on average) multiplied by 5 months = \$ 100.00

TOTAL: = \$6,975.00

* * * * *

Please call me if you have any questions regarding the enclosed materials.

Sincerely,



Leslie J. Kerman

Enclosures

WILDER PCR PRESIDENT COMMITTEE
 COMMITTEE DISBURSEMENTS COVERING 08/13/93 --- -10/31/94

<u>PAYER</u>	<u>CHECK NUMBER</u>	<u>DATE OF CHECK</u>	<u>AMOUNT OF CHECK</u>	<u>EXPENSE DESCRIPTION</u>
Treasurer of Virginia	731	08/19/93	15.50	Federal Express
Nicholas Perrins	732	08/23/93	375.00	Consulting Fees
Elliott & Zweben, P.C.	733	08/23/93	5,282.20	Legal & Administrative Fees
Treasurer of Virginia	734	09/30/93	31.00	Federal Express
Treasurer of Virginia	735	12/06/93	15.50	Federal Express
Internal Revenue Service	753	04/05/94	13.50	Taxes
Internal Revenue Service	754	04/05/94	56.00	Taxes
Epstein Becker & Green	755	04/26/94	4,272.87	Legal & Administrative Fees
Nicholas Perrins	756	04/26/94	300.00	Consulting Fees
NationsBank	Bk Stmt	06/17/94	2.49	Bank Service Charge
Internal Revenue Service	757	07/05/94	973.35	Taxes
Southwest Credit System	758	07/07/94	287.31	AT&T Long Distance
NationsBank	Bk Stmt	07/18/94	2.08	Bank Service Charge
NationsBank	Bk Stmt	08/19/94	1.26	Bank Service Charge
Elliott & Zweben, P.C.	760	09/06/94	2,365.32	Legal & Administrative Fees
NationsBank	Bk Stmt	09/21/94	1.92	Bank Service Charge
NationsBank	Bk Stmt	10/20/94	7.92	Bank Service Charge
TOTAL			\$14,003.22	

WILDER EXPLORATORY COMMITTEE 1-01 731
 P.O. BOX 1515 AUGUST 19th 93
 RICHMOND, VA 23212 04 730/100
1993

PAY TO THE ORDER OF Treasurer of Virginia \$ 15.50
Fifteen and 50/100 DOLLARS

NationsBank
 NationsBank of Virginia, N.A.
 Alexandria, VA

FOR Reimbursement - FedEx
 :056007387: 7922 1933A 0731

 P0000001550

EXPRESS

BILL TO: GOVERNORS OFFICE
STATE CAPITAL
RICHMOND, VA 23219

SENDER ACTIVITY SUMMARY

INVOICE NO. 6-922-0272R ACCOUNT NO. 117-2209
PAGE 1 OF 2

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND ADDRESS	PACKAGE TYPE	NA PRIORITY LTR	CHARGES	NET CHARGES	
771123111	BILL KERR STATE CAPITAL RICHMOND, VA 23219	LESLIE KERR 1111 1/2 ST N A SUITE P C NORFOLK VIRGINIA 23507 VA STEVEN R. WILSON	✓		15.50	15.50	
0104004	1 SHIPPED 07/14/93						
SENDER SUBTOTAL					15.50	PAY THIS AMOUNT	15.50

7-822-140-140-140

QUESTION? CALL OUR BILLING SERVICE CENTER, 800-822-1407, 9AM-5PM EST MONDAY-FRIDAY (IN BUSINESS). WE CALL YOU 24/7. SEND US YOUR PROBLEM OR YOU CAN RETURN THE MONEY/ISSUE ADVISE (1ST PRIZE OF THIS CHECK) WITH YOUR PAYMENT. MAIL TO: FEDERAL EXPRESS CORP., P.O. BOX 1148, DEPT. A, RICHMOND, VA 23001-1148

R. Check # 731

8-19-93

NICHOLAS PERRINS
1223 Prince Street
Alexandria, Virginia 22314
703-516-4481

INVOICE

TO: Leslie Kerman
The Wilder Committee

FROM: Nicholas Perrins

DATE: November 10, 1994

For consulting services during the period between April 1, 1994 through November 9, 1994:

Ninety three point five (93.5) hours at \$25.00 per hour.

\$2,337.50

I hereby state that this information is correct and accurately reflects the work I performed during these time periods.


Nicholas Perrins

LAW OFFICES
ELLIOTT & ZWEBEN, P.C.
1227 25TH STREET, N.W.
SUITE 800
WASHINGTON, D.C. 20037
TELEPHONE (202) 861-1878
TELECOPIER (202) 535-2882

STATEMENT

TAX IDENTIFICATION NO 52-1353269

October 11, 1994

WILDER FOR PRESIDENT

Fee For Legal Services:

Approximately Three Month Period: 07/13/94-10/10/94: \$6,000.00

Disbursements Through October 10, 1994:

Duplicating	66.44
Federal Express/Messenger	89.08
Local Travel/Parking	56.50
Telephone/Fax/Postage	92.77
Other Expenses	45.48

TOTAL DUE: \$6,350.27

Please make check payable to "Elliott & Zweben, P.C."

NationsBank

600 N. WASHINGTON STREET
ALEXANDRIA, VIRGINIA 22314

WILDER EXPLORATORY COMMITTEE
PO BOX 1515
RICHMOND VA 23212-1515

1666000 - ALEXANDRIA OFFICE
FULL ANALYSIS CHECKING ACCOUNT

TAX-ID: 541571008 ⁶⁰

Statement of Account

PAGE 1

Last Statement Date: 07/30/93
Current Statement Date: 08/31/93

For Information Regarding Your Account Call:
SEE LAST PAGE

Your Account Number:
7922 1933

Your Endorsement:
2

Balance Last Statement	We Have Added		We Have Subtracted		Resulting In A Balance Of
	Number	Deposits Totalling	Number	Debits Totalling	
1390246	0	000	2	39050	1351196

THE NEW BUSINESS SCHEDULE OF FEES IS EFFECTIVE AS OF FEBRUARY 1, 1993. THE SCHEDULE OF FEES WAS ANNOUNCED THROUGH A SEPARATE MAILING IN LATE DECEMBER. IF YOU HAVE QUESTIONS CONCERNING THE INFORMATION, PLEASE CONSULT WITH YOUR RELATIONSHIP MANAGER.

Posting Date	Transaction Description	Reference Number	Transaction Amount
08/20	CHECK # 731*	15273563	15.50
08/26	CHECK # 732	34118994	375.00

DAILY LEDGER BALANCE SUMMARY:

DATE	BALANCE	DATE	BALANCE	DATE	BALANCE
08/20	13,886.96	08/26	13,511.96		
AVERAGE DAILY LEDGER BALANCE FROM 08/01 TO 08/31					13,823.87
AVERAGE DAILY COLLECTED BALANCE FROM 08/01 TO 08/31					13,823.87

 * FOR INFORMATION REGARDING YOUR ACCOUNT CALL:
 * CUSTOMER SERVICE 301-891-7400 OR 1-800-222-7162 *
 * TTY (HEARING IMPAIRED) 301-270-7081 *
 * PRODUCT INFORMATION 1-800-782-2265 *

ationsBank

600 N. WASHINGTON STREET
ALEXANDRIA, VIRGINIA 22314

WILDER EXPLORATORY COMMITTEE
PO BOX 1515
RICHMOND VA 23212-1515

Statement Of Account

PAGE 1

Last Statement Date: 08/31/93
Current Statement Date: 09/30/93

For Information Regarding Your Account Call:
SEE LAST PAGE

Your Account Number:
7922 1933

Name Employed:
1

666000 - ALEXANDRIA OFFICE
ULL ANALYSIS CHECKING ACCOUNT

TAX-ID: 541571008 60

Since Last Statement	We Have Added		We Have Withdrawn		Resulting In A Balance Of
	Number	Deposits Totalling	Number	Items Totalling	
1351196	0	000	1	528220	822976

THE NEW BUSINESS SCHEDULE OF FEES IS EFFECTIVE AS OF FEBRUARY 1, 1993.
THE SCHEDULE OF FEES WAS ANNOUNCED THROUGH A SEPARATE MAILING IN LATE
DECEMBER. IF YOU HAVE QUESTIONS CONCERNING THE INFORMATION, PLEASE
CONSULT WITH YOUR RELATIONSHIP MANAGER.

Transaction Description	Reference Number	Transaction Amount
-------------------------	------------------	--------------------

9/02 CHECK # 733# 34508273 5,282.20

DAILY LEDGER BALANCE SUMMARY:

DATE	BALANCE	DATE	BALANCE
9/	8,229.76	1	
VERAGE DAILY LEDGER BALANCE FROM 09/01 TO 09/30			8,405.83
VERAGE DAILY COLLECTED BALANCE FROM 09/01 TO 09/30			8,405.83

* FOR INFORMATION REGARDING YOUR ACCOUNT CALL: *
* CUSTOMER SERVICE 301-891-7400 OR 1-800-222-7162 *
* TTY (HEARING IMPAIRED) 301-270-7081 *
* PRODUCT INFORMATION 1-800-782-2265 *

ationsBank

600 N. WASHINGTON STREET
ALEXANDRIA, VIRGINIA 22314

WILDER EXPLORATORY COMMITTEE
PO BOX 1515
RICHMOND VA 23212-1515

Statement Of Account

PAGE 1

Last Statement Date	Current Statement Date
09/30/93	10/29/93

For Information Regarding Your Account Call
SEE LAST PAGE

Your Account Number
7922 1933

Items Endorsed
1

1666000 - ALEXANDRIA OFFICE
FULL ANALYSIS CHECKING ACCOUNT

TAX-ID: 541571008 ⁶⁰

Balance Last Statement	We Have Added		We Have Withdrawn		Ending in A Balance Of
	Number	Deposits Totalling	Number	Items Totalling	
822976	0	000	1	3100	819876

Posting Date	Transaction Description	Reference Number	Transaction Amount
10/01	CHECK # 734*	11060001	31.00

DAILY LEDGER BALANCE SUMMARY:

DATE	BALANCE	DATE	BALANCE	DATE	BALANCE
10/01	8,198.76	1			
AVERAGE DAILY LEDGER BALANCE FROM 10/01 TO 10/29					8,198.76
AVERAGE DAILY COLLECTED BALANCE FROM 10/01 TO 10/29					8,198.76

 * FOR INFORMATION REGARDING YOUR ACCOUNT CALL: *
 * CUSTOMER SERVICE 301-891-7400 OR 1-800-222-7162 *
 * TTY (HEARING IMPAIRED) 301-270-7081 *
 * PRODUCT INFORMATION 1-800-782-2265 *

Statement Of Account

PAGE 1

Previous Statement Date	Current Statement Date
	10/29/93 11/30/93

For Information Regarding Your Account Call

SEE LAST PAGE

Your Account Number

7922 1933

Items Enclosed

0

ationsBank
600 N. WASHINGTON STREET
ALEXANDRIA, VIRGINIA 22314

WILDER EXPLORATORY COMMITTEE
PO BOX 1515
RICHMOND VA 23212-1515

666000 - ALEXANDRIA OFFICE
ULL ANALYSIS CHECKING ACCOUNT

TAX-ID: 541571008 ⁶⁰

Previous Statement	We Have Added		We Have Subtracted		Resulting in A Balance Of	
	Number	Dollars Totaling	Number	Dollars Totaling		
819876	0	000	0	000		819876

Transaction Description	Reference Number	Transaction Amount
-------------------------	------------------	--------------------

VERAGE DAILY LEDGER BALANCE FROM 11/01 TO 11/30 8,198.76
 VERAGE DAILY COLLECTED BALANCE FROM 11/01 TO 11/30 8,198.76

 * FOR INFORMATION REGARDING YOUR ACCOUNT CALL: *
 * CUSTOMER SERVICE 301-891-7400 OR 1-800-222-7162 *
 * TTY (HEARING IMPAIRED) 301-270-7081 *
 * PRODUCT INFORMATION 1-800-782-2265 *

ATTACHMENT 2

Page 11 of 44

ationsBank

600 N. WASHINGTON STREET
ALEXANDRIA, VIRGINIA 22314

WILDER EXPLORATORY COMMITTEE
PO BOX 1515
RICHMOND VA 23212-1515

Statement Of Account

PAGE 1

Last Statement Date	Current Statement Date
11/30/93	12/31/93

For Information Regarding Your Account Call
SEE LAST PAGE

Your Account Number
7922 1933

Name Endorsed
1

666000 - ALEXANDRIA OFFICE
FULL ANALYSIS CHECKING ACCOUNT

TAX-ID: 541571008 ⁶⁰

From Last Statement	We Have Added		We Have Subtracted		Resulting In A Balance Of
Number	Deposits Totaling	Number	Items Totaling		
819876	0	1	1550		818326

Transaction Description	Reference Number	Transaction Amount
12/07 CHECK # 735*	13660734	15.50

DAILY LEDGER BALANCE SUMMARY:

DATE	BALANCE	DATE	BALANCE
12/07	8,183.26	1	
AVERAGE DAILY LEDGER BALANCE FROM 12/01 TO 12/31			8,186.26
AVERAGE DAILY COLLECTED BALANCE FROM 12/01 TO 12/31			8,186.26

 * FOR INFORMATION REGARDING YOUR ACCOUNT CALL: *
 * CUSTOMER SERVICE 301-891-7400 OR 1-800-222-7162 *
 * TTY (HEARING IMPAIRED) 301-270-7081 *
 * PRODUCT INFORMATION 1-800-782-2265 *

Statement Of Account

PAGE 1

Last Statement Date	Current Statement Date
12/31/93	01/31/94

For Information Regarding Your Account Call

SEE LAST PAGE

Your Account Number

7922 1933

Items Enclosed

0

NationsBank

600 N. WASHINGTON STREET
ALEXANDRIA, VIRGINIA 22314

WILDER EXPLORATORY COMMITTEE
PO BOX 1515
RICHMOND VA 23212-1515

666000 - ALEXANDRIA OFFICE
FULL ANALYSIS CHECKING ACCOUNT

TAX-ID: 541571008 ⁶⁰

Balance Last Statement	By New Activity		By New Withdrawals		Resulting In A Balance Of	
	Number	Amount Totaling	Number	Amount Totaling		
818326	0	000	0	000		818326

Posting Date	Transaction Description	Reference Number	Transaction Amount
--------------	-------------------------	------------------	--------------------

AVERAGE DAILY LEDGER BALANCE FROM 01/01 TO 01/31 8,183.26
 AVERAGE DAILY COLLECTED BALANCE FROM 01/01 TO 01/31 8,183.26

 * FOR INFORMATION REGARDING YOUR ACCOUNT CALL: *
 * CUSTOMER SERVICE 301-891-7400 OR 1-800-222-7162 *
 * TTY (HEARING IMPAIRED) 301-270-7081 *
 * PRODUCT INFORMATION 1-800-782-2265 *

ationsBank

600 N. WASHINGTON STREET
ALEXANDRIA, VIRGINIA 22314

WILDER EXPLORATORY COMMITTEE
PO BOX 1515
RICHMOND VA 23212-1515

Statement Of Account

PAGE 1

Last Statement Date	Current Statement Date
01/31/94	02/28/94

For Information Regarding
Your Account Call

SEE LAST PAGE

Your Account Number

7922 1933

Items Enclosed

0

1666000 - ALEXANDRIA OFFICE
FULL ANALYSIS CHECKING ACCOUNT

TAX-ID: 541571008 ⁶⁰

Balance Last Statement	Number	W/ Items Added	Deposits Totalling	Number	W/ Items Enclosed	Items Totalling	Resulting In A Balance Of
018326	0		000	0		000	818326

MAKE DIRECT DEPOSIT OF PAYROLL PART OF YOUR BUSINESS STREAMLINING EFFORTS. SAVE UP TO 50% IN YOUR PAYROLL ADMINISTRATIVE COSTS AND IMPROVE EMPLOYEE PRODUCTIVITY. CONTACT YOUR ACCOUNT REPRESENTATIVE.

Posting Date	Description	Reference Number	Transaction Amount
--------------	-------------	------------------	--------------------

AVERAGE DAILY LEDGER BALANCE FROM 02/01 TO 02/28 8,183.26
 AVERAGE DAILY COLLECTED BALANCE FROM 02/01 TO 02/28 8,183.26

 * FOR INFORMATION REGARDING YOUR ACCOUNT CALL: *
 * CUSTOMER SERVICE 301-891-7400 OR 1-800-222-7162 *
 * TTY (HEARING IMPAIRED) 301-270-7081 *
 * PRODUCT INFORMATION 1-800-782-2265 *

The total of represents the correct amount of money you have in the bank

NationsBank

600 N. WASHINGTON STREET
ALEXANDRIA, VIRGINIA 22314

WILDER EXPLORATORY COMMITTEE
PO BOX 1515
RICHMOND VA 23212-1515

1666000 - ALEXANDRIA OFFICE
FULL ANALYSIS CHECKING ACCOUNT

TAX-ID: 541571008 ⁶⁰

Statement Of Account PAGE 1

Last Statement Date	Current Statement Date
02/28/94	03/31/94

For Information Regarding
Your Account Call

SEE LAST PAGE

Your Account Number

7922 1933

Dolls Enclosed

0

Balance Last Statement	By New Adds		By New Subtractions		Resulting in A Balance Of
	Number	Deposits Totaling	Number	Debits Totaling	
818326	0	000	0	000	818326

MAKE DIRECT DEPOSIT OF PAYROLL PART OF YOUR BUSINESS STREAMLINING
EFFORTS. SAVE UP TO 50% IN YOUR PAYROLL ADMINISTRATIVE COSTS AND
IMPROVE EMPLOYEE PRODUCTIVITY. CONTACT YOUR ACCOUNT REPRESENTATIVE.

Folioing Date	Transaction Description	Reference Number	Transaction Amount
---------------	-------------------------	------------------	--------------------

AVERAGE DAILY LEDGER BALANCE FROM 03/01 TO 03/31	8,183.26
AVERAGE DAILY COLLECTED BALANCE FROM 03/01 TO 03/31	8,183.26

 * FOR INFORMATION REGARDING YOUR ACCOUNT CALL: *
 * CUSTOMER SERVICE 301-891-7400 OR 1-800-222-7162 *
 * TTY (HEARING IMPAIRED) 301-270-7081 *
 * PRODUCT INFORMATION 1-800-782-2265 *

WHERE THIS ENTRY IS SHOWN, A DEPOSITING CHECK OR CHECKS. The total(s) represents the current amount of **ATTACHMENT** the bank

NationsBank

600 N. WASHINGTON STREET
ALEXANDRIA, VIRGINIA 22314

WILDER EXPLORATORY COMMITTEE
PO BOX 1515
RICHMOND VA 23212-1515

Statement Of Account

PAGE 1

Statement Date	03/31/94	Statement Date	04/29/94
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For Information Only Your Account Call	SEE LAST PAGE
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Your Account Number	7922 1933
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New Endorse	3
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666000 - ALEXANDRIA OFFICE
FULL ANALYSIS CHECKING ACCOUNT

TAX-ID: 541571008 60

Balance Last Statement	By Item Added	By Item Subtracted	Resulting in A Balance Of
Number	Deposits Totalling	Number	Items Totalling
018326	0	3	434237
	000		384089

BEGINNING MAY 5, THE NATIONSBANK TOLL-FREE COMMERCIAL CUSTOMER SERVICE LINE WILL HAVE A NEW PHONE NUMBER: 1-800-232-5252.

Transaction Date	Transaction Description	Debit/Number	Transaction Amount
		11172515	13.50
04/22	CHECK # 753*	11810498	56.00
04/21	CHECK # 754	15503328	4,272.87
04/27	CHECK # 755		

DAILY LEDGER BALANCE SUMMARY:

DATE	BALANCE	DATE	BALANCE	DATE	BALANCE
04/21	8,127.26	04/22	8,113.76	04/27	3,840.89
AVERAGE DAILY LEDGER BALANCE FROM 04/01 TO 04/29					7,590.82
AVERAGE DAILY COLLECTED BALANCE FROM 04/01 TO 04/29					7,590.82

 * FOR INFORMATION REGARDING YOUR ACCOUNT CALL: *
 * CUSTOMER SERVICE 301-891-7400 OR 1-800-222-7162 *
 * TTY (HEARING IMPAIRED) 301-270-7081 *
 * PRODUCT INFORMATION 1-800-782-2265 *

WHERE THIS ASTERISK IS SHOWN A PRECEDING CHECK OR CHECKS

NationsBank

P.O. BOX 27025, VA2-125-04-01
 RICHMOND, VA 23261-7025

WILDER EXPLORATORY COMMITTEE
 PO BOX 1515
 RICHMOND VA 23212-1515

666000 - ALEXANDRIA OFFICE
 FULL ANALYSIS CHECKING ACCOUNT

TAX-ID: 541571008 ⁶⁰

Statement of Account

PAGE 1

Last Statement Date	Current Statement Date
04/29/94	05/31/94

For Information Regarding
 Your Account Call

(800) 232-5252

Your Account Number

7922 1933

Items Enclosed

1

Number	We Have Added		We Have Subtracted		Resulting In A Balance Of
	Number	Deposits Totalling	Number	Items Totalling	
384089	0	000	4	30000	354089

THE NATIONSBANK TOLL-FREE COMMERCIAL CUSTOMER SERVICE LINE NOW HAS A NEW PHONE NUMBER: 1-800-232-5252.

Transaction Description	Reference Number	Transaction Amount
5/05 CHECK # 756*	31321517	300.00

AILY LEDGER BALANCE SUMMARY:

DATE	BALANCE	DATE	BALANCE
5/1	3,540.89	1	
VERAGE DAILY LEDGER BALANCE FROM 05/01 TO 05/31			3,579.59
VERAGE DAILY COLLECTED BALANCE FROM 05/01 TO 05/31			3,579.59

 * ACCOUNT INFORMATION FOR HEARING IMPAIRED (TTY) *
 * IS AVAILABLE BY CALLING: 1-800-554-3788 *

NationsBank

P.O. BOX 27025, VA2-125-04-01
RICHMOND, VA 23261-7025

WILDER EXPLORATORY COMMITTEE
PO BOX 1515
RICHMOND VA 23212-1515

Statement Of Account PAGE 1

Last Statement Date	Current Statement Date
05/31/94	06/30/94
For Information Regarding Your Account Call	
(800) 232-5252	
Your Account Number	
7922 1933	
Items Enclosed	
0	

1666000 - ALEXANDRIA OFFICE
FULL ANALYSIS CHECKING ACCOUNT

TAX-ID: 541571008 ⁶⁰

Balance Last Statement	Number	Deposits Totalling	Number	Items Totalling	Resulting In A Balance Of
354089	1	879.22	1	249	4417.62

Posting Date	Transaction Description	Reference Number	Transaction Amount
06/28	DEPOSIT	15922216	879.22+
06/17	SERVICE CHARGES FOR PERIOD 05/94 - 05/94 - CPA	051000010030947	2.49

DAILY LEDGER BALANCE SUMMARY:

DATE	BALANCE	DATE	BALANCE	DATE	BALANCE
06/17	3,538.40	06/28	4,417.62		
AVERAGE DAILY LEDGER BALANCE FROM 06/01 TO 06/30					3,627.65
AVERAGE DAILY COLLECTED BALANCE FROM 06/01 TO 06/30					3,598.34

 * ACCOUNT INFORMATION FOR HEARING IMPAIRED (TTY) *
 * IS AVAILABLE BY CALLING: 1-800-554-3788 *

ationsBank

P.O. BOX 27025, VA2-125-04-01
RICHMOND, VA 23261-7025

WILDER EXPLORATORY COMMITTEE
PO BOX 1515
RICHMOND VA 23212-1515

Statement Of Account

PAGE 1

Last Statement Date	Current Statement Date
06/30/94	07/29/94

For Information Regarding Your Account Call
(800) 232-5252

Your Account Number
7922 1933

Items Enclosed
2

44000 - ALEXANDRIA OFFICE
ANALYSIS CHECKING ACCOUNT

TAX-ID: 541571008 ⁶⁰

Last Statement	W. Henry Added		W. Henry Subtracted		Resulting In A Balance Of	
	Number	Deposits Totalling	Number	Items Totalling		
441762	0	000	3	126274		315488

Transaction Description	Reference Number	Transaction Amount
012 CHECK # 757	12661870	973.35
015 CHECK # 758	15442115	287.31
018 SERVICE CHARGES FOR PERIOD 06/94 - 06/94 - CPA	051000015151185	2.08

LEDGER BALANCE SUMMARY:

DATE	BALANCE	DATE	BALANCE
07/12	3,444.27	07/15	3,156.96
DRAGE DAILY LEDGER BALANCE FROM 07/01 TO 07/29			
DRAGE DAILY COLLECTED BALANCE FROM 07/01 TO 07/29			
			3,631.15
			3,631.15

* ACCOUNT INFORMATION FOR HEARING IMPAIRED (TTY) *
* IS AVAILABLE BY CALLING: 1-800-554-3788 *

ATTACHMENT 2
Page 19 of 49

NationsBank

P.O. BOX 27025, VA2-125-04-01
 RICHMOND, VA 23261-7025

WILDER EXPLORATORY COMMITTEE
 PO BOX 1515
 RICHMOND VA 23212-1515

Statement Of Account

PAGE 1

Last Statement Date	Current Statement Date
08/31/94	09/30/94

For Information Regarding Your Account Call
(800) 232-5252

Your Account Number
00 7922 1933

Items Excluded
1

1666000 - ALEXANDRIA OFFICE
 FULL ANALYSIS CHECKING ACCOUNT

TAX-ID: 541571008 ⁶⁰

Balance Last Statement	By Item Added		By Item Subtracted		Resulting in A Balance Of
	Number	Deposits Totaling	Number	Items Totaling	
315362	0	000	2	236724	78638

NOTICE: NEW DEPOSIT AGREEMENT AND DISCLOSURES ARE EFFECTIVE 9/23/94.
 COPIES WILL BE AVAILABLE AT YOUR BANKING CENTER BY 9/14/94. CHANGES
 INCLUDE FASTER AVAILABILITY FOR CASH AND WIRE TRANSFER DEPOSITS.

Pending Date	Transaction Description	Reference Number	Transaction Amount
--------------	-------------------------	------------------	--------------------

09/08	CHECK # 760*	36619143	2,365.32
09/21	SERVICE CHARGES FOR PERIOD 08/94 -08/94 - CPA	051000017752018	1.92

DAILY LEDGER BALANCE SUMMARY:

DATE	BALANCE	DATE	BALANCE	DATE	BALANCE
09/08	788.30	09/21	786.38		
AVERAGE DAILY LEDGER BALANCE FROM 09/01 TO 09/30					1,339.56
AVERAGE DAILY COLLECTED BALANCE FROM 09/01 TO 09/30					1,339.56

 * ACCOUNT INFORMATION FOR HEARING IMPAIRED (TTY) *
 * IS AVAILABLE BY CALLING: 1-800-554-3788 *

NationsBank

P.O. BOX 27025, VA2-125-04-01
RICHMOND, VA 23261-7025

WILDER EXPLORATORY COMMITTEE
PO BOX 1515
RICHMOND VA 23212-1515

Statement Of Account

PAGE 1

09/30/94 10/31/94

(800) 232-5252

00 7922 1933

0

1666000 - ALEXANDRIA OFFICE
FULL ANALYSIS CHECKING ACCOUNT

TAX-ID: 541571008 ⁶⁰

78638	1	278500	4	792	356346
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NOTICE: NEW DEPOSIT AGREEMENT AND DISCLOSURES ARE EFFECTIVE 9/23/94.
COPIES WILL BE AVAILABLE AT YOUR BANKING CENTER BY 9/14/94. CHANGES
INCLUDE FASTER AVAILABILITY FOR CASH AND WIRE TRANSFER DEPOSITS.

10/11 DEPOSIT 15092114 2,785.004

~~RECORD SERVICE CHARGES FOR PERIOD~~

DAILY LEDGER BALANCE SUMMARY:

10/11 3,571.38 | 10/20 3,563.46 |

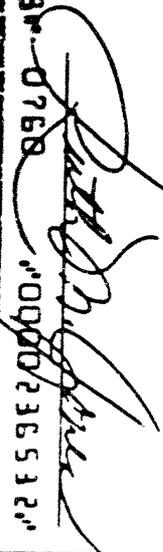
AVERAGE DAILY COLLECTED BALANCE FROM 10/01 TO 10/31 2,580.08

* ACCOUNT INFORMATION FOR HEARING IMPAIRED (TTY)
* IS AVAILABLE BY CALLING: 1-800-556-3788

WHERE THIS ASTERISK IS SHOWN A PRECEDING CHECK (OR CHECKS)
IS STILL OUTSTANDING, IS INCLUDED IN A SUMMARY LISTING,
OR HAS BEEN INCLUDED IN A PREVIOUS STATEMENT.

The total(s) represents the correct amount of money you have to the bank.
Please examine it over. If an error is reported within 14 days, your account will be
considered correct.

ATTACHMENT 2
Page 21 of 44

WILDER EXPLORATORY COMMITTEE 1-91 760
 P.O. BOX 4515
 RICHMOND, VA 23217
 DATE: Sept. 6, 19 94 00 1/18/98
 1998
 PAY TO THE ORDER OF Att & Zweben, P.C. \$ 2,365.32-
 TWO THOUSAND THREE HUNDRED SIXTY FIVE 32/100 DOLLARS
National Bank
 National Bank of Virginia
 1000 Bank Building
 Richmond, VA 23219
 FOR Legal Fee
 :0568073871: 7922 1933W 0758 "0000236532"


LAW OFFICES
ELLIOTT & ZWEBEN, P.C.
1227 25th STREET, N.W.
SUITE 800
WASHINGTON D.C. 20037
TELEPHONE (202) 861-1876
TELECOPIER (202) 296-2862

STATEMENT

TAX IDENTIFICATION NO 52-1353269

July 25, 1994

WILDER FOR PRESIDENT

Fee For Legal Services:

Four Month Period: 03/13/94-07/12/94: \$2,000.00

Disbursements Through July 12, 1994:

Duplicating	75.46
Federal Express	95.00
Messenger/Local Travel	79.98
Telephone/Fax/Postage	103.88
Other Expenses	11.00

TOTAL DUE: \$2,365.32

Please make check payable to "Elliott & Zweben, P.C."

309 President
WILDER EXPLORATORY COMMITTEE
P. O. BOX 1515
RICHMOND, VA 23212

13061397-41
1-81

758

08/29/50
1950

PAY TO THE
ORDER OF

Southwest Virginia Explorer
for Wilder Explorer Committee
10000028731

NationsBank

NationsBank of Virginia, N.A.
Alexandria, VA.

FOR *ATY Donna Victoria*
⑆056007387⑆⑆7922 1933⑆ 0758 ⑆0000028731⑆

0055807A



SOUTHWEST CREDIT SYSTEMS

ACCT # 0110297055001

*Call Ref**

1367377 041
WILMINGTON RESIDENT
1712 NEW HAMPSHIRE AVE NW
WASHINGTON, DC 20009 2502

AT&T-LONG DISTANCE SERVICE CMA

BALANCE DUE : \$287.31

DATE 03-02-94

SECOND NOTICE

RECORDS INDICATE THAT YOU HAVE NOT RESPONDED TO OUR PREVIOUS NOTICE CONCERNING THE ABOVE MATTER, NOR IS THERE ANY INDICATION OF A DISPUTE REGARDING ANY OF THE CHARGES.

IF YOU HAVE A LEGITIMATE DISPUTE YOU SHOULD PAY WHAT YOU THINK YOU OWE ALONG WITH YOUR EXPLANATION SO THAT THE DISPUTED CHARGES CAN BE INVESTIGATED. IF YOU HAVE ALREADY PAID THE AMOUNT DUE PLEASE CALL COLLECT AND ADVISE US AT ONCE, OTHERWISE THIS CLAIM WILL BE ASSIGNED TO OUR REGULAR COLLECTION DEPARTMENT FOR FURTHER ACTION.

ALL PAYMENTS AND CORRESPONDENCE SHOULD BE SENT IN THE ENCLOSED ENVELOPE.

SINCERELY'

COLLECTION DEPT.

S17

*Jim Peter
3/4/94
(initials)*

MAR 11 1994



P.O. BOX 115151 / CARROLLTON, TEXAS 75011-5151 (800) 852-4777
XXXXXX

MENT 2
Page 25 of 44

WILDER EXPLORATORY COMMITTEE	1-01	757
P.O. BOX 1616		
RICHMOND, VA 23212	July 5, 19 94	00 730/100 1000
PAY TO THE ORDER OF <u>Internal Revenue Service</u>		
Nine Seventy Three and 35/100		\$ 973.35
		DOLLARS
NationsBank		
NationsBank of Virginia, N.A.		
Alexandria, VA		
54 -157-1008		
FOR <u><i>Pat M. Jones</i></u>		
:0560073871: 7922 1933# 0757		"00000097335"



Department of the Treasury
Internal Revenue Service
PHILADELPHIA, PA 19255

Date of this notice: JUNE 13, 1994
Taxpayer Identifying Number: 54-1571808
Form 941 Tax Period: DEC. 31, 1991



WILDER EXPLORATORY COMMITTEE
1227 25TH ST NW STE 800
WASHINGTON DC 20037-1256274

For assistance you may call us at:

410-962-2598 LOCAL BALT
1-800-829-1848 OTHER MI
1-800-829-1848 D.C

Or you may write to us at the address shown at the left. If you write, be sure to attach the bottom part of this notice.

CORRECTION NOTICE - AMOUNT DUE IRS

WE CORRECTED AN ERROR ON YOUR EMPLOYMENT TAX RETURN FOR THE ABOVE TAX PERIOD. YOU MAY WANT TO CHECK YOUR FIGURES AGAINST THOSE SHOWN BELOW:

ADJUSTED TOTAL OF FEDERAL INCOME TAX WITHHELD	6318.88	
TAX ON SOCIAL SECURITY WAGES	248.00	
TAX ON MEDICARE WAGES AND TIPS	658.86	
ADJUSTED TOTAL OF SOCIAL SECURITY AND MEDICARE TAXES		386.88
TOTAL TAXES		6616.88
TOTAL TAX DEPOSITED FOR THE QUARTER	6.86	
OVERPAYMENT FROM THE PREVIOUS QUARTER	.00	
OTHER CREDITS AND PAYMENTS	13.58-	
TOTAL CREDITS AND PAYMENTS		\$13.58-
UNDERPAYMENT		6602.58
PLUS PENALTY	8227.79	
INTEREST	8143.86	
TOTAL AMOUNT YOU OWE		\$973.35

WE MADE THE CORRECTIONS FOR THE FOLLOWING REASON(S):
THERE WAS A DISCREPANCY IN THE AMOUNT REPORTED AS TOTAL FEDERAL TAX DEPOSITS FOR THE QUARTER AND THE AMOUNT SHOWN ON OUR RECORDS.

THE FOLLOWING IS A LIST OF PAYMENTS WE HAVE CREDITED TO YOUR ACCOUNT FOR THE ABOVE TAX AND TAX PERIOD:

DATE OF PAYMENT	AMOUNT	DATE OF PAYMENT	AMOUNT	DATE OF PAYMENT	AMOUNT
APR. 14, 1994	13.58				

TO AVOID ADDITIONAL PENALTY AND/OR INTEREST, PLEASE ALLOW ENOUGH MAILING TIME SO THAT WE RECEIVE YOUR PAYMENT BY JUNE 23, 1994. MAKE YOUR CHECK OR MONEY ORDER PAYABLE TO THE INTERNAL REVENUE SERVICE. SHOW YOUR TAXPAYER IDENTIFYING NUMBER ON YOUR PAYMENT AND MAIL IT WITH THE BOTTOM PART OF THIS NOTICE. IF YOU BELIEVE THIS NOTICE IS NOT CORRECT, PLEASE COMPLETE THE INFORMATION ABOUT THE PAYMENTS YOU MADE ON THE FLAP OF THE ENCLOSED ENVELOPE.
PENALTY AND INTEREST CHARGES

\$138.60 FILING LATE - SEE ENCLOSED NOTICE, CODE 01
\$89.19 PAYING LATE - SEE ENCLOSED NOTICE, CODE 07
\$143.06 INTEREST - SEE ENCLOSED NOTICE, CODE 09

To make sure that IRS employees give courteous responses and correct information to taxpayers, a second IRS employee sometimes listens in on phone calls.

ep this part for your records

Check 6 Form 941 (Rev. 9-81)

Attachment 2
Page 27 of 44

WILDER EXPLORATORY COMMITTEE 1-91 **756**
 P.O. BOX 1619
 RICHMOND, VA 23212
 APRIL 26, 1994
 44 738/500
 1994

PAY TO THE ORDER OF Nicholas Perrins \$ 300.00---
 Three Hundred and 00/100-----DOLLARS

NationsBank
 NationsBank of Virginia, N.A.
 Alexandria, VA

FOR Consulting Fee
 :056007387: 7922 1933* 0756

 00000030000

661175

Nicholas Perrins
1622 North Randolph Street
Arlington, Virginia 22207
703-516-4481

March 30, 1994

Leslie Kerman
Council
Wilder For President Committee
1227 23rd Street, NW
8th Floor
Washington, DC 20037

Dear Leslie,

For consulting services rendered from September 1993 - March 1994 in connection with the
Wilder for President Audit:

Twenty Four (24) hours at \$25.00/hour:

\$600.00

I certify this accurately reflects time worked for the Wilder for President Committee

Sincerely,



Nicholas Perrins

SCHEDULE D-P

Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

**DEBTS AND OBLIGATIONS
EXCLUDING LOANS**

Use separate
schedule for each
category of the detailed
summary page.

PAGE 1 OF (total pages) 1
LINE NUMBER 12

NAME OF COMMITTEE (in Full)	OUTSTANDING BALANCE BEGINNING THIS PERIOD	DATE AND AMOUNT INCURRED THIS PERIOD	PAYMENT THIS PERIOD	OUTSTANDING BALANCE AT CLOSE OF THIS PERIOD
Wilder for President Committee				
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor Elliott & Zweben, P.C. 1227 25th Street, N.W. Washington, DC 20037	4,272.87	0	4,272.87*	0
Nature of Debt (Purpose): Legal & Administrative Fees				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor *Please note that the payment itemized herein on Line 23 to Epstein Becker & Green, P.C. satisfied the Committee's obligation to Elliott & Zweben, P.C., which is a professional corporation within Epstein Becker & Green, P.C.				
Nature of Debt (Purpose):				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor Nicholas Perrins 1622 North Randolph Street Arlington, VA 22207	600.00	0	300.00**	0
Nature of Debt (Purpose): Consulting Fees				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor **Please note that the remaining balance of \$300.00 was converted to volunteer activity, leaving the Committee with a zero balance owed to Mr. Perrins.				
Nature of Debt (Purpose):				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
1) SUBTOTALS This Period This Page (optional)				0
2) TOTAL This Period (last page this line only)				0
3) TOTAL OUTSTANDING LOANS from Schedule C-P (last page only)				0

A. AGUMENT 2
30 of 44

755

WILDER EXPLORATORY COMMITTEE 1-91

P.O. BOX 1816 April 26, 1994

RICHMOND, VA 23212

PAY TO THE ORDER OF Epstein Becker & Green, P.C. \$ 4,277.87

Four Thousand Two Hundred Seventy Two 87/100 DOLLARS

PlattinBank
 National Bank of Virginia, N.A.
 Alexandria, VA

Legal Fee/Wilder For President

⑆056007387⑆ 7922 1933⑆ 0755

⑆0009⑆ 27287⑆

[Signature]

LAW OFFICES
ELLIOTT & ZWEBEN, P.C.
1227 25TH STREET N.W.
SUITE 800
WASHINGTON D.C. 20037
TELEPHONE (202) 861-1876
TELECOPIER (202) 296-2882

STATEMENT

TAX IDENTIFICATION NO 52-1353269

March 29, 1994

WILDER FOR PRESIDENT

Fee For Legal Services:

Seven Month Period: 08/13/93-03/12/94: \$3,500.00

Disbursements Through March 12, 1994:

Duplicating	274.24
Federal Express	129.00
Messenger/Local Travel	109.00
Telephone/Fax/Postage	102.49
Other Expenses	158.14

TOTAL DUE: \$4,272.87

Please make check payable to "Elliott & Zweben, P.C."

WILDER EXPLORATORY COMMITTEE 1-01 754
 P. O. BOX 1515
 RICHMOND, VA 23212
 APR 13/1980
 1980

PAY TO THE ORDER OF *Virginia Williams* \$ 52.00
 DOLLARS
NationsBank
 NationsBank of Virginia, N.A.
 Alexandria, VA

FOR *1991 Form 910*
 #056007387# 7922 1933# 0754 #0000005600#

Paul M. Jones

Form **940**

Employer's Annual Federal Unemployment (FUTA) Tax Return

OMB No. 1545-0028

1991

Department of the Treasury
Internal Revenue Service

For Paperwork Reduction Act Notice, see separate instructions.

Name (as distinguished from trade name)
WILDER EXPLORATORY COMMITTEE

Calendar year

Trade name, if any
1227 - 25TH STREET, NW

Employer identification number

Address and ZIP code
**8TH FLOOR
WASHINGTON, DC 20037**

54-1571008

If incorrect, make any necessary change.

FF	
FD	
FP	
I	
T	

- A** Did you pay all required contributions to state unemployment funds by the due date of Form 940? (If a 0% experience rate is granted, check "Yes" and see instructions.) Yes No
- If you checked the "Yes" box, enter the amount of contributions paid to state unemployment funds **\$** 1
- B** Are you required to pay contributions to only one state? Yes No
- If you checked the "Yes" box: (1) Enter the name of the state where you have to pay contributions **VIRGINIA**
- (2) Enter your state reporting number(s) as shown on state unemployment tax return.
- If you checked the "No" box, be sure to complete Part III and see the instructions.
- C** If any part of wages taxable for FUTA tax is exempt from state unemployment tax, check the box. (See the instructions.)

If you will not have to file returns in the future, check here, complete, and sign the return.

If this is an Amended Return, check here.

Part III Computation of Taxable Wages (to be completed by all taxpayers)

1	Total payments (including exempt payments) during the calendar year for services of employees.	1	14,000	-
2	Exempt payments. (Explain each exemption shown, attach additional sheets if necessary.)	2	0	-
3	Payments of more than \$7,000 for services. Enter only the amounts over the first \$7,000 paid to each employee. Do not include payments from line 2. Do not use the state wage limitation.	3	7,000	-
4	Total exempt payments (add line 2 and 3).	4	7,000	-
5	Total taxable wages (subtract line 4 from line 1).	5	7,000	-
6	Additional tax resulting from credit reduction for unpaid advances to the state of Michigan. Enter the wages included on line 5 above for that state and multiply by the rate shown. (See the instructions.) Enter the credit reduction amount here and in Part II, line 2, or Part III, line 5: Michigan wages x .008 =	6	0	-

Cat. no. 1123-0

Form 940 (1991)

Form 940 (1991)

Part II Tax Due or Refund (Complete if you checked the "Yes" boxes in both questions A and B and did not check the box in C.)

1	FUTA tax (multiply the wages in Part I, line 5 by .009 and enter here)	1	56	-
2	Enter amount from Part I, line 6	2	0	-
3	Total FUTA tax (add lines 1 and 2)	3	56	-
4	Total FUTA tax deposited for the year, including any overpayment applied from a prior year	4	0	-
5	Balance due (subtract line 4 from line 3). This should be \$100 or less. Pay to the Internal Revenue Service	5	56	-
6	Overpayment (subtract line 3 from line 4). Check if it is to be: <input type="checkbox"/> Applied to next return or <input type="checkbox"/> Refunded	6		

Part III Tax Due or Refund (Complete if you checked the "No" box in either question A or B or you checked the box in C.)

- Gross FUTA tax. Multiply the wages in Part I, line 5, by .062.
- Maximum credit. Multiply the wages in Part I, line 5, by .054.
- Computation of tentative credit

(i) Name of state	(ii) State reporting number(s) as shown on employer's state contribution returns	(iii) Taxable payroll (as defined in state act)	(iv) State experience rate		(v) State experience rate	(vi) Contributions if rate had been 3.6% (col. (v) x .054)	(vii) Contributions payable at experience rate (col. (v) x col. (iv))	(viii) Additional credit (col. (vi) minus col. (vii). If 0 or less, enter 0.	(ix) Contributions actually paid to the state
			From	To					
3a Totals									

3b Total tentative credit (add line 3a, columns (vii) and (viii) only—see instructions for limitations on late payments)

4	Credit: Enter the smaller of the amount in Part III, line 2, or line 3b	4	
5	Enter the amount from Part I, line 6	5	
6	Credit allowable (subtract line 5 from line 4). (If zero or less, enter 0.)	6	
7	Total FUTA tax (subtract line 6 from line 1)	7	
8	Total FUTA tax deposited for the year, including any overpayment applied from a prior year	8	
9	Balance due (subtract line 8 from line 7). This should be \$100 or less. Pay to the Internal Revenue Service	9	
10	Overpayment (subtract line 7 from line 8). Check if it is to be: <input type="checkbox"/> Applied to next return, or <input type="checkbox"/> Refunded	10	

Part IV Record of Quarterly Federal Tax Liability for Unemployment Tax (Do not include state liability)

Quarter	First	Second	Third	Fourth	Total for year
Liability for quarter	-0-	48.00	8.00	-0-	56.00

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete, and that no part of any payment made to a state unemployment fund claimed as a credit was or is to be deducted from the payments to employees.

Signature: M. R. Wines Title (Owner, etc.): TREASURER Date: 3-23-94

WILDER EXPLORATORY COMMITTEE 1-91 753
P.O. BOX 1616 06/29/50
RICHMOND, VA 23212 1958

PAY TO THE ORDER OF *Wilder Exploratory Committee* \$ *13.50*
Wilder Exploratory Committee DOLLARS

NationsBank
NationsBank of Virginia, N.A.
Alexandria, VA

FOR *12/1/91* *12/1/91*
⑆056007387⑆ 7922 1933⑈ 0753 ⑆0000001350⑆

[Signature]

Employer's Quarterly Federal Tax Return

See Circular E for more information concerning employment tax returns.

Please type or print.

Form **941**

(For January 1991)
Department of the Treasury
Internal Revenue Service

4144

OMB No 1545-0049

Expires 5-31-93

Your name, address, employer identification number, and calendar quarter of return. (If not correct, please change.)

54-1571008
WILDER EXPLORATORY COMMITTEE
1227 25TH STREET, N.W.
8TH FLOOR
WASHINGTON, DC 20037

DECEMBER 1991

T
FF
FD
FP
T

If address is different from prior return check here

IRS Use

1	2	3	3	3	3	3	3	4	4
5	5	5	8	8	8	8	8	10	10
10	10	10	10	10	10	10	10	10	10

Date final wages paid

10/22/91

If you do not have to file returns in the future check here

If you are a seasonal employer see Seasonal employers on page 2 and check here

- 1a Number of employees (except household) employed in the pay period that includes March 12th
- b If you are a subsidiary corporation AND your parent corporation files a consolidated Form 1120, enter parent corporation employer identification number (EIN)

1a	
2	2,000
3	310
4	
5	310
6a	248
6b	
7	58
8	306
9	
10	306
11	
12	
13	-0-
14	616
15	
16	616
17	602 50
18	13 50

- 2 Total wages and tips subject to withholding, plus other compensation
- 3 Total income tax withheld from wages, tips, pensions, annuities, sick pay, gambling, etc.
- 4 Adjustment of withheld income tax for preceding quarters of calendar year (see instructions)
- 5 Adjusted total of income tax withheld (line 3 as adjusted by line 4—see instructions)
- 6a Taxable social security wages (Complete line 7) $2,000 \times 12.4\% (.124) =$
- b Taxable social security tips $2,000 \times 2.9\% (.029) =$
- 7 Social security and Medicare taxes (add lines 6a, 6b, and 7)
- 8 Adjustment of social security and Medicare taxes (see instructions for required explanation)
- 9 Adjusted total of social security and Medicare taxes (line 8 as adjusted by line 9—see instructions)
- 10 Backup withholding (see instructions)
- 11 Adjustment of backup withholding tax for preceding quarters of calendar year
- 12 Adjusted total of backup withholding (line 11 as adjusted by line 12)
- 13 Total taxes (add lines 5, 10, and 13)
- 14 Advance earned income credit (EIC) payments made to employees, if any
- 15 Total deposits for quarter, including overpayment applied from a prior quarter, from your records (Form 941) if you have treated backup withholding as a separate liability
- 16 Total deposits for quarter, including overpayment applied from a prior quarter, from your records (Form 941) if you have treated backup withholding as a separate liability
- 17 Advance earned income credit (EIC) payments made to employees, if any
- 18 Advance earned income credit (EIC) payments made to employees, if any
- 19 Overpayment, if line 17 is more than line 16, enter here $\$$ and check if to be Applied to next return OR Refunded.

Total Federal Tax Liability (You must complete if line 16 is \$500 or more and Schedule B is not attached.) See instructions before checking these boxes.

Quarter	First month of quarter	Second month of quarter	Third month of quarter
1st through 31st	308.00		
1st through 31st			
1st through 31st			
1st through 31st			
1st through 31st	308.00		
1st through 31st			
1st through 31st			
1st through 31st			
1st through 31st	616.00	-0-	616.00

Signature: *Mark R. Warner*
Title: *Treasurer*
Date: *3/23/91*

WILDER EXPLORATORY COMMITTEE		1-81	735
P.O. BOX 1515			
RICHMOND, VA 23212		Dec. 6	93
PAY TO THE ORDER OF <u>Treasurer of Virginia</u>		\$	15.50
Fifteen and 50/100 -----			DOLLARS
NationsBank		171661009	
National Bank of Virginia, N.A.			
Alexandria, VA			
FOR <u>Reimbursement - Fed. Ex.</u>			
⑆056007387⑆ 7922 1933⑆ 0735			
			⑈0000001550⑆



BILL TO: GOVERNORS OFFICE
STATE CAPITOL
RICHMOND, VA 23219

SENDER ACTIVITY SUMMARY

INVOICE NO. 5-106-34710 ACCOUNT NO. 1173-9684
PAGE 4 OF 4
DATE 11/25/93

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
7711553846	BILL KEOUGH GOVERNORS OFFICE STATE CAPITOL RICHMOND, VA 23219	MARK WARDEN COLUMBIA CELLULAR STE 300 281 NORTH UNION ST ALEXANDRIA, VA 22314 AA DELIVERED: 11/15/93 09:54 SIGNED: H. ROSS	1/ NA	PRIORITY LTR	15.50	15.50
12783423 1	SHIPPED 11/12/93					
7711553850	BILL KEOUGH GOVERNORS OFFICE STATE CAPITOL RICHMOND, VA 23219	BILL ROYSER A P BROADCAST SERVICES 1025 K STREET NW WASHINGTON, DC 20006 AA DELIVERED: 11/13/93 11:59 SIGNED: K. AJCEK	1/ NA	PRIORITY LTR SAT SERVICE	15.50 10.00	25.50
7703423 1	SHIPPED 11/12/93					
7711553861	NANCY M MAUPIN GOVERNORS OFFICE STATE CAPITOL RICHMOND, VA 23219	MR FRAN VALLUZZO VTS TELECOMMUNICATIONS CORP 1115 10TH ST NW 1110 FL WASHINGTON, DC 20036 AA DELIVERED: 11/18/93 09:15 SIGNED: H. ROSS	1/ 1	PRIORITY PAK	22.50	22.50
12782616 1	SHIPPED 11/17/93					

CONTINUED NEXT PAGE

QUESTIONS? CALL OUR BILLING SERVICE CENTER 800-822-1147, 7AM - 8PM (CST) MONDAY - FRIDAY (IN MEMPHIS, TN, CALL 901-387-8888)
TO ENSURE PROPER CREDIT PLEASE RETURN THE REMITTANCE ADVICE (1ST PAGE OF THIS INVOICE) WITH YOUR PAYMENT.
MAIL TO: FEDERAL EXPRESS CORP., P.O. BOX 1140, DEPT. A, MEMPHIS, TN 38101-1140

Form 13-0145 5/91

Paid 12-6-93

Check # 735

ATTACHMENT 2
Page 39 of 44

WILDER EXPLORATORY COMMITTEE 1-91 734
 P.O. BOX 1818
 RICHMOND, VA 23212
 Sept. 30 19 93 48 734/360
 1993

PAY TO THE ORDER OF Treasurer of Virginia \$ 31,00

Thirty-one and 00/100 ----- DOLLARS

NationsBank 7 1 6 6 0 6 2 1
 NationsBank of Virginia, N.A.
 Alexandria, VA

for Reimbursement-FedEx
Paul M. Bruce

056007387 7922 1933* 0734 *0000003100*

732

08/23/93

August 23, 93

WILDER EXPLORATORY COMMITTEE
P.O. BOX 1618
RICHMOND, VA 23212

\$ 375.00

PAY TO THE ORDER OF Nicholas Perrins
Three Hundred Seventy-Five and 00/100 DOLLARS

NationsBank
NationsBank of Virginia, N.A.
Alexandria, VA

FOR Salary 7922 1933# 0732 700 600 37500#

1:0560073871:



Nicholas Perrins
850 Randolph Street
Apartment 1123
Arlington, VA 22203
(703) 516-4481

INVOICE

For the Period of April 1 through August 11, 1993

To: Leslie Kerman, General Counsel
Wilder for President Committee

Date: August 12, 1993

Consulting Services

Fifteen (15) hours at \$25.00 per hour

\$375.00

I certify that this invoice is accurate and completely reflects hours worked during this time period.


Nicholas Perrins

LAW OFFICES
ELLIOTT & ZWEBEN, P.C.
1227 25TH STREET, N.W.
SUITE 800
WASHINGTON, D.C. 20037
TELEPHONE (202) 861-1876
TELECOPIER (202) 296-2882

STATEMENT

TAX IDENTIFICATION NO 52-1353269

August 12, 1993

WILDER FOR PRESIDENT

Fee For Legal Services:

Approximately One and One-Half
Month Period: 07/01/93-08/12/93: \$5,000.00

Disbursements Through August 12, 1993:

Duplicating	121.22
Federal Express	15.50
Messenger/Local Travel	47.00
Telephone/Fax/Postage	98.48

TOTAL DUE: \$5,282.20

Please make check payable to "Elliott & Zweben, P.C."

* DUE UPON RECEIPT *

WILDER EXPLORATORY COMMITTEE 1-91 733
 P.O. BOX 2015 81724/160
 RICHMOND VA 23114 1988
 August 23, 93
 \$ 5,282.20
 and Zweben, P.C.
 Two Hundred Eighty-two and 20/100ths
 PERS/DIABURMENTS
 0733 #0000528220#
 055007387: 7922 1933#

EPSTEIN BECKER & GREEN, P.C.

ATTORNEYS AT LAW

1227 28th STREET, N.W.

WASHINGTON, D.C. 20037-1180†

TELEPHONE (202) 661-0000

TELECOPIER (202) 890-8888

DIRECT LINE

250 PARK AVENUE
NEW YORK, NEW YORK 10177-0077†
(212) 381-4800

1875 CENTURY PARK EAST
LOS ANGELES, CALIFORNIA 90067-360†
(310) 556-8888

828 LANDMARK SQUARE
STAMFORD, CONNECTICUT 06901-2704†
(203) 348-3737

ONE RIVERFRONT PLAZA
NEWARK, NEW JERSEY 07102-840†
(201) 642-1000

78 STATE STREET
BOSTON, MASSACHUSETTS 02109
(617) 342-4000

2 EMBARCADERO
SAN FRANCISCO, CALIFORNIA 94111-9994
(415) 244-3888

18700 MERTY DRIVE
DALLAS, TEXAS 75261-120†
(214) 400-8100

116 SOUTH MONROE STREET
TALLAHASSEE, FLORIDA 32301-4230
(904) 891-8888

2400 SOUTH OCEA HIGHWAY, SUITE 100
MIAMI, FLORIDA 33133
(305) 888-4888

810 KING STREET, SUITE 301
ALEXANDRIA, VIRGINIA 22304-318†
(703) 684-8884

LEGAL & CONFIDENTIAL

October 13, 1994

† P.C. NEW YORK, WASHINGTON, D.C., NEW JERSEY,
CONNECTICUT, VIRGINIA AND TEXAS ONLY

**VIA FACSIMILE &
HAND-DELIVERED**

James S. Portnoy, Esquire
Office of the General Counsel
Federal Election Commission
999 B Street, N.W., Room 657
Washington, DC 20463

**RE: WILDER FOR PRESIDENT COMMITTEE: POST ORAL
PRESENTATION SUBMISSION OF WRITTEN MATERIAL**

Dear Mr. Portnoy:

Enclosed please find information concerning several matters discussed during the October 5, 1994 oral presentation to the Commission by the Wilder for President Committee, Inc. ("the Committee").

L CAPITAL ASSETS

It is our understanding that the Audit Division is recalculating the value of the qualified campaign expenses resulting from the transfer of the Committee's capital assets to individuals who provided service to the Committee. While the initial value ascribed by the Audit Division to each asset was based solely on the Committee's buy-out payment (as reflected on the attached NOCO worksheet, Attachment A), it is our understanding that the Audit Division will now value each asset based on a pro-rata allocation of the \$15,452 capital asset figure. This will result in a decrease in the alleged amount of matching funds in excess of entitlement received by the Committee.

Oct 14 7 13 PM '94
RECEIVED
FEDERAL ELECTION COMMISSION
WASHINGTON, DC

ATTACHMENT 3
Page 1 of 8

James S. Portnoy, Esquire
October 13, 1994
Page 2

In that regard, enclosed is a corrected statement from Joseph F. Johnson, confirming that he received ~~three~~ enhanced computers and a laser printer as part of his compensation package from the campaign. See Attachment B. His memorandum of August 25, 1992 (which previously was provided to your office) erroneously stated that he received only two computers.

Consequently, for NOCO purposes, the value of the capital assets (i.e., three computers and one laser printer) received by Mr. Johnson as part of his compensation package, and thus the value of qualified campaign expenses for NOCO purposes is \$12,191.63 -- as opposed to \$3,950 as reflected on Attachment A.

As you will note from his attached statement, to the extent Mr. Johnson's services (particularly during the 2/1/92-5/31/92 close-down period) exceeded the monetary value of his compensation from the Committee, Mr. Johnson has converted such services to volunteer services on behalf of the Committee.'

II. NON-QUALIFIED CAMPAIGN EXPENSE

As you are aware, the Audit Division classified two Committee expenditures to the Commonwealth of Virginia totalling \$2,785, for use of the state plane on July 14, 1991 and July 21, 1994 as non-campaign related. In that regard, by check dated October 5, 1994, Governor Wilder personally reimbursed the Committee in the amount of \$2,785. A copy of said check, as well as the deposit slip and bank deposit receipt, are enclosed as Attachment C.

Now that this refund has occurred, it is our understanding that the referenced \$2,785 in Committee expenditures will no longer be considered non-qualified campaign expenses for which a repayment is required.

III. WIND-DOWN COSTS

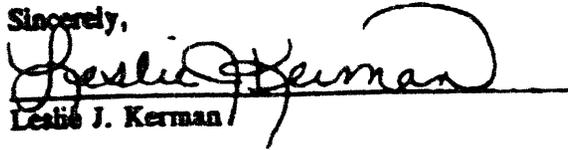
The Committee notes that the Audit Division has under-estimated the Committee's wind-down expenses. The Committee will continue to forward copies of its actual expenses to your office, so that appropriate adjustments can be made to its NOCO position.

The attached NOCO worksheet reflects \$7,550 in volunteer services for Mr. Johnson. However, this does not take into account the value of services provided to the Committee by Mr. Johnson from February 1, 1992 through May 31, 1992.

James S. Portnoy, Esquire
October 13, 1994
Page 3

In addition to the matters discussed herein, the Committee is working diligently to obtain the other information and documentation requested by the Commission during the October 5th oral presentation, and will forward same to your office as quickly as possible. Moreover, the Committee is mindful of its continuing obligation to provide your office with information that will impact its NOCO position, and will continue to fulfill such obligation in a timely basis.

Sincerely,


Leslie J. Kerman

Attachments (3)

ATTACHMENT 3
Page 3 of 2

ATTACHMENT A (PG. 1/1)

Federal Election Commission
Audit Division (11408)
FEC FORM 20-2

4

(ASSIGNMENT)

(SUBJECT)

Willie for President
Paul Capable - Joe Johnson

INDEX

PAGE

G 7/5.4

6

PREPARED BY

DATE

4

3-1-93

LEAD AUDITOR
APPROVAL

Pa Cash	14,000.00	14,000.00	
April 14 1993	10,000.00	10,000.00	
Account Payable at 1-2-93	14,000.00	14,000.00	
Ret 002 Request to Johnson			
2/90	5,000.00	5,000.00	
4/92	2,000.00	2,000.00	
4/92	3,000.00	3,000.00	
4/92	4,000.00	4,000.00	
Total Requests	14,000.00	14,000.00	
2. Account 0002 Payable to			
Difference	7,500	(14,000 - 6,500)	adjustments
adjustment amounts			
On 1-30 Cash Ret 14,000 for the following			
Donation			
FCP 90392 0X 33 N/A System	1,000	1,000	
- 4 NA 100, 10, 100 N/A 200	1,000	1,000	
- 12 NA 100	1,000	1,000	
- 100 N/A 100	1,000	1,000	
- 100 N/A 100	1,000	1,000	
- 100 N/A 100	1,000	1,000	
FCP 90386-0X 33 N/A System	1,000	1,000	
- 1 NA 100, 12, 100	1,000	1,000	
- 40 NA 100	1,000	1,000	
- 100 N/A 100	1,000	1,000	
HP 33449A LAURENT SHERIFF TIL	1,000	1,000	

ADDENDA:

Total Cash by Johnson
Red Funded 3,750
750 (1,260)



JOHNSON & ASSOCIATES, INC.
A Public Affairs Company

ATTACHMENT B (PG. 1/3)

August 4, 1994

Leslie J. Kerman, Esquire
Epstein Becker & Green, P.C.
1227 25th Street, N.W., Suite 700
Washington, DC 20037

Dear Leslie:

I realize that my memorandum to you of August 25, 1992 on the Wilder for President Committee contained an inadvertent, but significant, error. Specifically, as discussed at Paragraphs 6 and 7 of the memorandum, I received ~~two~~, and not one, "286 computers with monochrome monitors" from the committee as part of my compensation package. An amended memorandum reflecting this correction is attached.

I apologize for any inconvenience this may cause you and the Committee.

Sincerely,

Joseph F. Johnson



JOHNSON & ASSOCIATES, INC.
A Public Affairs Company

ATTACHMENT B (PG. 2/3)

MEMORANDUM

TO: Leslie J. Kernan
FROM: Joseph F. Johnson 
DATE: August 4, 1994
RE: Wilder for President Committee

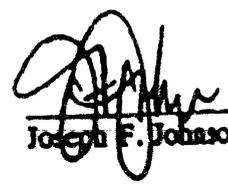
Per your request, the following outlines the services I performed for the Wilder for President Committee ("the Committee"), and my anticipated and actual compensation from the Committee in connection with these services.

1. I served as a senior consultant to, and then campaign manager of, the Committee during the five-month period from September 1, 1991 through January 31, 1992. In addition, from February 1, 1992 to date, I have performed a variety of services over countless hours in connection with winding-down the campaign.
2. During the referenced five-month period (9/1/91-1/31/92), I worked night and day, almost always seven days a week, on the Wilder campaign. As campaign manager, I was in charge of the day-to-day management of the Committee, and performed all tasks associated with serving as a campaign manager of a presidential campaign.
3. I charged the Committee \$10,000.00 a month, or a total of \$50,000.00, for my services for the referenced five-month period. I also anticipated billing the Committee \$5,500.00 per month for February through May, 1992 in connection with my close-down related services. Moreover, I billed the Committee for various expenses I incurred on its behalf.
4. As of June 1, 1992, I had received a total of \$8,500.00 in fees from the Committee, as well as several expense reimbursement checks. The \$8,500.00 in fees were paid by two Committee checks: a \$3,500.00 check dated December 19, 1991 and a \$5,000.00 check dated February 28, 1992. (This \$5,000.00 check was entirely for fees, even though the face of the check states "consulting fees and expenses".) Thus, as of June 1, 1992, the Committee owed me \$41,500.00 in fees for the 9/1/91-1/31/92 period, plus fees in connection with my post-1/31/92 close-down activities.

ATTACHMENT B (PG. 3/3)

5. Though I understood the Committee's desire to be fiscally-conservative, I was quite concerned about the slow manner in which I was being paid by the Committee, and made repeated pleas that my fees be paid (as you were aware).
6. After numerous conversations regarding this matter, I agreed to accept the following as final compensation for the services I performed for the Committee from September 1, 1991 through the Committee's close-down: \$30,000.00 plus 3 computers and a laser printer which were owned by the Committee. Accordingly, I received a \$30,000.00 check from the Committee which was dated June 12, 1992. Moreover, I received one "386 computer with color monitor", two "286 computers with monochrome monitors" (all of these computers had been enhanced) and one "HP Laser Jet III Printer."
7. Thus, in total I received \$38,500.00 in fees, plus 3 computers and a laser printer, as compensation for my services to the Committee.
8. To the extent my services to the Committee exceeded the monetary value of my compensation as described above, I hereby convert the remainder of my services to volunteer services on behalf of the Committee.

BY:



Joseph F. Johnson

Dated: August 4, 1994

ATTACHMENT C (PG. 1/1)

Consolidated bank & trust co.

LAWRENCE DOUGLAS WILDER
P.O. BOX 184
MORNING, VA 22111

Oct. 5, 1994

24557

PAY TO THE ORDER OF Wilder For President \$ 2,785.00

Two Thousand Seven Hundred Eighty Five and 00/100 DOLLARS

No 1	Reimbursement For Travel Expenses	

⑆00024557⑆ ⑆051000127⑆ 01000098⑆ 1⑆

Lawrence Douglas Wilder

WILDER EXPLORATORY COMMITTEE
P.O. BOX 184
MORNING, VA 22111

DLW

NationsBank
Member Bank of Virginia, N.A.

⑆056007387⑆ 7922 1933⑆

DATE	AMOUNT	DEPOSIT TICKET
10/05/94	2785.00	1000098

DEPOSIT TICKET
10/05/94
2785.00
1000098

NationsBank



Deposit/Payment Receipt

Member Bank of Virginia, N.A.

Opening Deposit
 Savings Deposit
 Line of Credit
 Certificate Loan
 Quoted Loan
 Withdrawal Card
 Federal Tax Deposit
 Auto Deposit Plan
 Other Transfer

All items are subject to verification, signature, and endorsement of the Bank and the signature of this Bank and its agents. All items are subject to verification, signature, and endorsement of the Bank and its agents. All items are subject to verification, signature, and endorsement of the Bank and its agents.

14141.178.010 10/11/94 13:07:15
ACCT-17221935
2,785.00 DEP

Please retain this document until receipt of your account statement.

Thank you for banking with NationsBank.

TRANSCRIPT OF PROCEEDINGS

FEDERAL ELECTION COMMISSION

In the Matter of:)

ORAL PRESENTATION: WILDER)
FOR PRESIDENT COMMITTEE, INC)

File No.: 94-112
LRA No.: 395

FEB 9 11 57 AM '95

FEDERAL ELECTION
COMMISSION
OFFICE OF RECORDS

OPEN MEETING

CORRECTED COPY

Pages: 1 through 67
Place: Washington, D. C.
Date: October 5, 1994

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1220 L Street, NW, Suite 600
Washington, D.C.
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ATTACHMENT 4
Page 1 of 68

FEDERAL ELECTION COMMISSION

In the Matter of:)
) File No.: 94-112
 ORAL PRESENTATION: WILDER) LRA No.: 395
 FOR PRESIDENT COMMITTEE, INC)

Wednesday,
October 5, 1994

Federal Election Commission
999 E. Street, N.W.
Washington, D.C.

The above-entitled matter came on for hearing,
pursuant to notice, at 10:00 a.m.

APPEARANCES:

On behalf of the Federal Election Commission:

- TREVOR POTTER, CHAIRMAN
- DANNY LEE MCDONALD, VICE-CHAIRMAN
- JOAN D. AIKENS, COMMISSIONER
- JOHN WARREN MCGARRY, COMMISSIONER
- SCOTT E. THOMAS, COMMISSIONER
- JOHN C. SURINA, STAFF DIRECTOR
- KIM BRIGHT-COLEMAN, ASSOCIATE GENERAL COUNSEL
- JAMES S. PORTNOY, ATTORNEY
- RICK HALTER, DEPUTY ASSISTANT STAFF DIRECTOR
- TOM NURTHEN, AUDIT MANAGER

On Behalf of the Witness:

LESLIE J. KERMAN, Esq.
 JOSEPH BIRKENSTOCK, Esq.
 Epstein, Becker & Green, P.C.
 1227 25th St., N.W.
 Washington, D.C. 20037
 (202) 861-1877

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I N D E X

WITNESS:

Leslie J. Kerman

EXAMINATION:

17

EXHIBITS:

PAGE

DESCRIPTION

Commission's

None.

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ATTACHMENT 4
Page 3 of 68

P R O C E E D I N G S

1
2 CHAIRMAN POTTER: Good morning, this special open
3 meeting of the Federal Election Commission will please come
4 to order. I note that Commissioner Elliott is unfortunately
5 unable to be with us today, due to illness. She has asked
6 that, we convey her apologies. She will, of course, have an
7 opportunity to review the transcript of this hearing. On
8 our agenda today is an oral presentation on behalf of the
9 Wilder for President Committee. The Committee is
10 represented by Leslie Kerman, its counsel, and Joe
11 Birkenstein, her associate. The Committee has requested
12 this opportunity to address the Commission concerning the
13 Commission's initial repayment determination, which is
14 contained in the final audit report that the Commission
15 approved on May 6, 1994. The final audit report was made
16 public by the Commission at that time, as our regulations
17 provide. In the final audit report, the Commission made an
18 initial determination that the Wilder for President
19 Committee must repay \$31,058 to the United States Treasury.
20 This amount includes a payment of \$12,026, which represents
21 the portion of \$42,224 in apparently non-qualified campaign
22 expenses incurred by the Committee that represent matching
23 funds. It also includes the repayment of \$19,032 in
24 matching funds received in apparent excess of the
25 Committee's entitlement. The Committee responded in writing

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1 to the initial repayment determination, July 25, 1994. The
 2 audit division and the Office of General Counsel have
 3 reviewed the documentation submitted by the Committee.
 4 Based on that review, they have concluded that the
 5 Commission's initial determination, regarding the amount of
 6 matching funds received in excess of entitlement, should be
 7 reduced by \$2849 and that the total repayment amount be
 8 reduced commensurately to \$28,209. Your response of July
 9 25, 1994, and these revised figures suggested by the
 10 Commission staff are public documents and are attached to
 11 today's agenda document. Accordingly, we are here today to
 12 hear the Committee's oral presentation. The purpose of this
 13 meeting is to give the Committee a further opportunity to
 14 demonstrate that no repayment or a lesser repayment is
 15 required. This is not an adversarial or trial type hearing.
 16 The Committee's counsel will have 30 minutes to make an
 17 opening presentation. At the conclusion of Ms. Kerman's
 18 presentation, each Commissioner will have an opportunity to
 19 ask questions. The General Counsel and the Audit Division
 20 will also have an opportunity to comment during this
 21 presentation. After this hearing, the Committee will have
 22 an opportunity to submit additional materials for the
 23 Commission's consideration. The Commission will then make a
 24 final determination and issue a statement of reasons in
 25 support of that determination.

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1 Ms. Kerman, you have 30 minutes for your
2 presentation and as you know that presentation should be
3 limited to these matters raised in your written response to
4 the Commission's initial repayment determination. Welcome.

5 MS. KERMAN: Thank you very much, Chairman Potter.
6 Does the mike work?

7 CHAIRMAN POTTER: It does.

8 MS. KERMAN: Okay, great. Again for the record,
9 my name is Leslie Kerman, and I am accompanied by Joe
10 Birkenstock, of the law firm of Epstein, Becker & Green. We
11 come before you today to make a presentation of behalf of
12 the Wilder for President Committee, as part of the
13 Committee's response to the Commission's initial repayment
14 determination. At the outset I would like to thank the
15 Commission for granting the Committee the opportunity to
16 make this presentation. A presentation which will be quite
17 brief, but which we hope will provide the Commission with a
18 greater appreciation of the Committee's position on several
19 important repayment issues. Before delving into these
20 issues, I would like to make several points with respect to
21 certain non-repayment and repayment matters involving the
22 Committee. First, as set forth in its September 29th
23 memorandum to the Commission, the FEC General Counsel is of
24 the position that non-repayment issues, such as those
25 involving possible additional payments by the Committee to

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1 the Commonwealth of Virginia are beyond the scope of this
 2 oral presentation and he recommends that such matters not be
 3 addressed here today. The Committee will abide by the
 4 General Counsel's recommendation regarding non-repayment
 5 issues. Second, the Audit Division has classified two
 6 Committee expenditures totaling \$2,785 to the Commonwealth
 7 of Virginia for use of the state plane on July 14th, 1991
 8 and July 21, 1991, as non-campaign related. Upon reviewing
 9 these transactions, the Committee and Governor Wilder agree
 10 with the Audit Division's classification of these
 11 expenditures. And the Governor will personally reimburse
 12 the Committee in the amount of \$2,785 in connection with
 13 these expenditures. Once this refund occurs, it is our
 14 understanding that these Committee expenditures will no
 15 longer be considered non-qualified campaign expenditures for
 16 which a repayment is required.

17 Now, the two significant repayment issues which
 18 the Committee would like to address today involve number
 19 one, the treatment of so-called severance payments to
 20 certain individuals and number two, the characterization of
 21 certain lease payments as capital assets for NOCO purposes.
 22 Let me begin with the severance payment issue. As you are
 23 aware, and as Chairman Potter summarized, the proposed
 24 repayment by the Committee to the U.S. Treasury currently
 25 stands at \$28,209. Of this amount, \$12,026 represents

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1 alleged non-qualified campaign expenses and \$16,183
2 represents alleged matching funds received in excess of
3 entitlement. Fifty percent of this proposed repayment to
4 the Treasury stems for the Audit Division's contention that
5 seven compensation payments by the Committee to seven
6 different individuals made soon after Governor Wilder's
7 January 8th, 1992, withdrawal from the Presidential campaign
8 are not qualified campaign expenses.

9 The Committee strongly disputes this contention.
10 It believes that all of its compensation payments were
11 reasonable and appropriate and perfectly permissible under
12 the FEC's regulations. Before discussing the details of
13 these payments, it's important to put them in context. As
14 previously mentioned, on January 8th, 1992, Governor Wilder
15 unexpectedly ended his campaign for the Democratic
16 Nomination for President. His withdrawal from the race
17 occurred approximately one month before the first
18 presidential caucus, and several months prior to many of the
19 southern state primaries where he was expected to do
20 particularly well. The Governor's announcement came as a
21 total surprise to his campaign committee. Particularly to
22 those individuals whose major, if not exclusive source of
23 income, was the Committee. Several of these individuals had
24 worked with the Committee since the spring of '91, others
25 had just recently quit their jobs to come work with the

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1 Committee. While all realized that a Presidential campaign
 2 is not exactly a secure and stable work environment, they
 3 all reasonably expected to be working for pay from the
 4 Campaign, through at least mid-March 1992. Following the
 5 January 8th announcement, the Committee had three objectives
 6 to satisfy with respect to its personnel and its personnel
 7 needs. First, it needed to notify certain individuals
 8 regarding the termination of their relationship with and
 9 compensation by the Committee as of a date certain. That's
 10 including those individuals' expectation of compensation
 11 from the Committee and the Committee's financial obligations
 12 to them. Number two, the Committee needed to maintain
 13 adequate staffing levels to perform close-out activities and
 14 FEC Audit compliance functions for both the short and long
 15 term. And, number three, the Committee needed to treat
 16 those individuals who worked for it in a fair and
 17 considerate manner. To accomplish these goals, the
 18 Committee took several steps with respect to seven
 19 individuals: Mr. Bates, Mr. Brazell, Mr. Easter, Mr.
 20 Hotchkiss, Mr. Thompson, Mr. Stevenson, and Ms. Callahan.
 21 Specifically, the Committee determined that it needed to
 22 terminate its existing compensation relationship with these
 23 seven individuals as of a date certain, while still having
 24 them available on an as needed basis for close-down
 25 activities and help in compiling information for the audit.

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1 Thus, the Committee paid each of them their regular semi-
2 monthly fee payment, from either January 15th or January
3 31st. And those particular disbursements are not in
4 question today. In addition, it paid each of them
5 approximately one month's fee as their final payment from
6 the Committee and for consideration for their assistance if
7 required with close-down activities. These final payments
8 resulted in four if these individuals being compensated in
9 effect at their regular rates through February 15th, 1994,
10 and the other three receiving compensation through February
11 28th. None of the seven individuals have received any
12 payments from the Committee subsequent to their referenced
13 final payments. The total dollar amount of the seven final
14 payments, which are termed severance payments by the
15 Committee, to these individuals was \$10,900. The Audit
16 Division, without citing any specific legal authority for
17 its decision, has classified these \$10,900 in payments as
18 non-qualified campaign expenses. The consequence of such
19 characterizations is that the Committee currently has a
20 \$14,005 repayment obligation to the Treasury in connection
21 with these seven payments. A \$3,105 pro-rata repayment
22 because they are considered apparent non-qualified campaign
23 expenses, and a \$10,900 impact on the Committee's NOCO
24 position and that's matching funds entitlement. The
25 Committee believes that the described \$10,900 in final

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1 payments to these seven individuals are entirely reasonable
2 and appropriate winding-down costs and thus qualified
3 campaign expenses. It is aware of no FEC regulations or
4 other legal authority which classifies conditional or
5 unconditional severance payments as per se non-qualified
6 campaign expenses. Nor is the Committee aware of any legal
7 authority that requires that severance payments must be made
8 pursuant to a pre-ineligibility, written agreement in order
9 to be characterized as qualified campaign expenses. Rather,
10 it was and is, the Committee's understanding that the
11 Committee had wide discretion in organizing its close-down
12 and that reasonable costs associated with that close-down
13 albeit, expenses for thank you parties, thank you notes or
14 limited severance payments -- would be accepted as qualified
15 campaign expenses as long as they were associated with the
16 termination of the campaign and reasonable in nature.

17 In judging the reasonableness of the disbursements
18 in question, it must be emphasized that the individuals who
19 received these final payments were not highly compensated
20 political gurus who were receiving \$10,000 a month in
21 consulting fees. Or media consultants being paid 15 percent
22 commissions on million dollar t.v. buys. Rather these final
23 payments went to six individuals whose income from the
24 Committee ranged from \$1000 to \$2000 per month, and one
25 other individual whose income equaled \$3000 per month and

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1 who received a final severance payment of only a half of one
2 month's fee of \$1500. The individuals in question were
3 regular, working men and women who through no fault of their
4 own, saw their source of income abruptly and unexpectedly
5 terminated. Given these circumstances as well as the
6 Committee's need to secure these individuals cooperation and
7 assistance if needed for wind-down purposes, the
8 Committee's final payments to individuals were both
9 reasonable and appropriate, and quite frankly, they were the
10 right thing to do. This certainly did not result in unjust
11 enrichment to anyone. What would be unjust however, is to
12 end up effectively penalizing the Committee to the tune of
13 \$14,005 in connection with these severance payments. Thus,
14 the Committee urges the Commission to classify the seven
15 payments as qualified campaign expenses.

16 Now I shall now turn to the issue of the
17 characterization of lease payments as capital assets. The
18 NOCO statement prepared by the Audit Division reflects the
19 Committee with capital assets that valued at \$15,452.
20 According to the Audit Division, these capital assets
21 consist of the value of computers purchased under a lease
22 buy-out in the amount of \$6,938, and prepaid lease payments
23 of these same computers of \$8,513. The Committee does not
24 dispute that moneies paid for the lease buy-out resulted in
25 a capital asset of \$6,938 in the form of ownership of the

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1 computers. However, regardless of when the bills were paid,
2 there's no legal justification for including the amounts of
3 any lease payments made by the Committee as capital assets.
4 By way of background, in October 1991, the Committee entered
5 into a lease with Fairfax Computer Products for four
6 computers and related equipment. As you will note, this
7 lease agreement was entered into several months prior to the
8 Governor's date of ineligibility, which was January 8th,
9 1992. The Committee received from Fairfax Computer
10 Products, invoices for lease payments per a lease contract.
11 The first invoice was dated October 28th, 1991 for the
12 amount of \$5,510, representing the first and last month's
13 lease payments as per the lease contract. The Committee
14 paid this invoice in full by check dated October 25th, 1991.
15 The Committee subsequently was invoiced and paid four
16 additional monthly lease payments. Then at the end of
17 January 1992, the Committee decided to purchase the four
18 computers and related equipment, and paid \$6,938 to Fairfax
19 Computer Products on January 29th, 1992, for the computers.
20 As the FEC's General Counsel has stated and I quote, "The
21 Committee acquired the computer equipment in question on
22 January 29th, 1992 - the day it bought out the leases."
23 Now, FEC regulations require that for equipment acquired
24 post-ineligibility as in the case here, the equipment must
25 be valued for NOCO capital assets purposes at its fair

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1 market value on the date of acquisition. The Committee paid
2 \$6,938 to acquire the equipment on January 29th. Thus --
3 the Committee accepts that its \$6,938 lease buy-out payment
4 of January 29th to purchase the computers should be included
5 as a capital asset for NOCO purposes. However, the
6 Committee vigorously disputes the Audit Division's position
7 that \$8,513 in required lease payments made by the
8 Committee, including a payment made on October 27th, 1991,
9 also be included as capital assets of the Committee for NOCO
10 purposes. The Committee is unaware of any legal or factual
11 basis for including lease payments as part of the
12 acquisition cost of computers. Nor does the General Counsel
13 offer any legal support to substantiate the Audit Division's
14 position on this matter. To the contrary, the \$8,513 in
15 lease payments were legal obligations, which the Committee
16 was required to pay regardless of any decision to purchase
17 or not to purchase the computer equipment on January 29th.
18 The lease payments are qualified campaign expenses made by
19 the Committee pursuant to pre-ineligibility contractual
20 obligations. They are not payments for the acquisition of
21 capital assets. And the erroneous inclusion of these
22 amounts as capital assets results in an understatement of
23 the Committee's net deficit by \$8,513.

24 Now I know this all sounds very technical and
25 boring, but this is much more than a technical accounting

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1 quirk. For a Committee, such as the Wilder for President
2 Committee, that was in a NOCO deficit situation, the
3 inclusion of this \$8,513 amount results in the Committee
4 having to pay \$8,513 back to the U.S. Treasury. Thus, -- we
5 urge the Commission to carefully review this matter, and
6 reduce the Committee's capital assets for NOCO purposes by
7 the referenced \$8,513.

8 Now, there are two other issues to which the
9 Committee requests the Commission's special consideration.
10 First, is the issue of \$6,400 in severance payments made to
11 five individuals who went on to do more work for
12 compensation from the campaign. The Committee recognizes
13 that the schedule of payments to these individuals does not
14 follow a neat and precise pattern. Nevertheless, the
15 overall amount of money paid to each individual is entirely
16 reasonable, and the result of each individual's negotiation
17 with Committee management regarding staying on for winding-
18 down and audit purposes. Thus, the Committee requests that
19 absent evidence that these payments to these individuals are
20 unreasonable and excessive, that all -- that the total fees
21 paid to each of these five individuals, including the
22 severance payments be classified as qualified campaign
23 expenses. In addition, the salary payments to Ruth Jones
24 and Bill Keough of \$10,000 and \$5,000 respectively, should
25 be treated similarly. The Committee concedes the fact that

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1 Ms. Jones and Mr. Keough did not charge the Committee as
2 routinely as they should have for services rendered. But
3 the fact remains that the total compensation paid to these
4 individuals is not excessive. Extensive memoranda and other
5 documentation have been provided to the Commission regarding
6 the services rendered to the Committee by these individuals.
7 The Committee believes that it has met its burden of
8 demonstrating that the payment to these individuals was
9 reasonable. To the extent the Audit Division disagrees with
10 the Committee we request that it not simply classify the
11 entire \$15,000 in payments to these individuals as non-
12 qualified campaign expenses but merely reduce the amount of
13 qualified campaign expenses to a level which the Audit
14 Division feels is justified. In view of the memoranda and
15 documentation provided to say that no portion of the \$15,000
16 in payments represents qualified campaign expenses is truly
17 unreasonable. And that is particularly the case for Mr.
18 Keough who was paid no other compensation by the Committee
19 other than the \$5,000 payment. Now, that concludes my
20 formal presentation to the Commission. I thank you for your
21 time and attention and I would welcome any questions you
22 might have.

23 CHAIRMAN POTTER: Thank you very much. I will go
24 around the table and give my colleagues a chance to ask
25 questions and for you to respond, and then I would also like

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1 Counsel's Office and the Audit Division to clarify any
2 points with you that they think would be helpful.
3 Commissioner McGarry would you like to start?

4 EXAMINATION

5 BY COMMISSIONER MCGARRY:

6 Q Thank you, Mr. Chairman. How would you summarize
7 the difference about the severance pay issue between the
8 Commission and yourself. For example, do you have a
9 different definition of severance or is it that they
10 continued working long after -- you know -- you claim they
11 got the severance pay -- how would you summarize the
12 difference?

13 A I think that -- what I'm trying to do here is
14 classify the individuals who received so called severance
15 payments, into two categories. First is the category which
16 I discussed of the seven individuals who received these
17 payments and these were the final payments they received
18 from the campaign. They received no other compensation from
19 the campaign after these payments. Now, --

20 Q Did they continue working even though they were
21 not compensated?

22 A No, they've not continued working on a regular
23 basis for the campaign. It may be the case and probably is
24 the case that some of these individuals have been contacted
25 by those people that have been working on the Committee's

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1 audit, for -- asking them about additional information or
2 asking them some questions but none of them have come to
3 work on a daily or even random basis to an office on behalf
4 of the Committee, no.

5 Q What documentation, I understand you submitted
6 some documentation on this issue with reference to the total
7 of \$10,900, with reference to six of the people. Is it your
8 position you supplied if not total or complete documentation
9 adequate compensation in your opinion for five of them?

10 A There are seven individuals, seven individuals who
11 I named who received the so-called severance payments and
12 were no longer working for the Committee. As we've stated,
13 the Committee's compensation arrangements with its
14 employees, at least these employees in question, were oral.
15 There were no written agreements, so I don't have written
16 documents to give to you. What I have provided is the
17 scheduled payments and the rationale for those payments.

18 Q When you say the schedule of payments, --

19 A -- made to the individual.

20 Q -- they weren't characterized in any way they --
21 these schedule of payments you're talking about? Is it
22 clear from that schedule that you're describing
23 documentation, the severance issue would be very clearly
24 described? As severance?

25 A Absolutely, the checks themselves some of the

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1 checks -- certain of the checks that were just for the
2 severance payments state on them severance -- the memo of
3 severance payment. Other -- in some instances there was a
4 payment that was a combined salary payment and severance
5 payment and that would say on it salary and severance
6 payment. So it's very clear which of the payments -- and
7 the Audit Division -- has identified seven payments, one
8 each for each of these individuals, which are of the so-
9 called severance payments in question.

10 Q What do you say is the date of the severance
11 payments? The date of ineligibility was January 8th, 1992.

12 A That's right. These payments were made -- six of
13 the payments were made on either January 29th or January
14 30th, one other payment was made February -- the payment to
15 John Brazell. None of the payments -- all of these payments
16 -- taken in total if you -- resulted in -- none of the
17 individuals in question received compensation beyond either
18 February 15th or February 30th even if you accounted for the
19 severance payments.

20 Q And was there any continuation of work subsequent
21 to that date?

22 A Not by those seven individuals. Now there are
23 five individuals, who I mentioned later in my presentation,
24 that received severance payments and also continued working
25 for the Committee for pay.

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1 Q Well, thank you Mr. Chairman and I know my
2 colleagues will have questions on that and the other issues.
3 Thank you Ms. Kerman.

4 CHAIRMAN POTTER: Commissioner Aikens.

5 BY COMMISSIONER AIKENS:

6 Q Thank you Mr. Chairman, thank you for coming Ms.
7 Kerman. I think you may have answered my first question,
8 which was, you were classifying these seven individuals or
9 you did in your statement as their payment being for
10 winding-down costs. Is that correct?

11 A Right -- how do you classify these in -- in fact
12 what happened is the campaign -- the reason the term
13 severance has been interjected in this debate is because the
14 individual who put the checks together wrote severance on
15 each check. What the arrangement was is that these people
16 would be paid, in most cases one month's salary in
17 consideration therefore they would be available to the
18 campaign on an as needed basis, they didn't have to
19 necessarily come to work everyday, to help with winding-down
20 activities. In addition though, these payments were made
21 in the traditional severance sense -- to sever, to let the
22 individual know that this was their last and final payment
23 they would be receiving from the campaign and subsequently
24 they would -- in several cases they would sever their
25 relationship with the campaign.

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1 Q So, it is not really, they're not really winding-
2 down costs, because none of these people did any work on
3 winding-down the campaign, is that correct?

4 A No, that's not -- I'm sorry, that's not
5 necessarily correct. These people -- the campaign's office
6 was open until February 12th. I don't know precisely, but I
7 believe a significant number of these people stayed working
8 at least partly or coming to work to the campaign. They
9 were probably spending some of their time looking for a job.
10 But they were also available and performed various functions
11 with respect to the wind-down, and putting together
12 information in anticipation of the FEC audit. So, these
13 payments were considered partial consideration for the work
14 that may or may not -- be asked to perform, depending on
15 whether there was needed, and then also severance in the
16 sense that -- would be their final payment from the
17 campaign.

18 Q But you don't have any documentation on which ones
19 did any work on the winding-down or what they did?

20 A No.

21 Q There's no record of that at all?

22 A No, but for that these checks say severance on
23 them, in every campaign that I've ever been involved with,
24 the day after the candidate either loses or in particular
25 the presidential situation drops out of the race, the next

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1 day, the next day all employees aren't told to leave through
2 the door, its not like a corporation where they take your
3 passes and you walk out. There's always confusion, there's
4 always winding-down activities, there's concern with
5 compliance. So, if we had not written severance on these
6 payments, and we just decided to lay several people -- and
7 lay them off, in effect, on a basis that we decided, I doubt
8 this would be an issue today. It's really, I think the
9 characterization on the check that's made this an issue.

10 Q That could be, but that's not -- I just wanted to
11 make your characterization of it correct in my mind. Really
12 your in a -- did they do anything? Mr. Keough and Ms.
13 Jones, you said Mr. Keough was paid nothing but the \$5,000.
14 Was he a volunteer during the campaign?

15 A Yes, he did volunteer activity during the
16 campaign. He -- there's a detailed memorandum of the
17 services that he provided. Including assisting the
18 assistant treasurer Ms. Jones, including taking leave from
19 his job and attending several events with Governor Wilder;
20 including working on qualifying the candidate to be on the
21 ballot in several states. And we've provided documentation,
22 including Federal Express packages he received and signed
23 for or sent. And documentation, other memoranda to document
24 that he spent time working on the campaign.

25 Q And was this \$5,000 meant to be reimbursement of

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1 expenses?

2 A No.

3 Q Just a bonus?

4 A It wasn't meant to be a bonus, it was meant to be
5 compensation for services provided.

6 Q But he had volunteered his services throughout the
7 campaign?

8 A He worked on the campaign, I'm sorry, were you
9 trying to gather whether or not he agreed at the beginning
10 of the campaign to be a volunteer and then asked --

11 Q And then afterwards--

12 A -- I'm sorry, no --to my knowledge he had never,
13 he had never said that what he was doing was as a volunteer.
14 I think that there was expectation that he would be paid.
15 By him that he would be paid. But he had not submitted a
16 bill to the campaign.

17 Q Thank you. Thank you Mr. Chairman.

18 CHAIRMAN POTTER: Commissioner Thomas.

19 BY COMMISSIONER THOMAS:

20 Q Thank you Mr. Chairman, thank you Leslie -- Joe,
21 great job so far.

22 A Thank you very much.

23 Q Your severance payment issue and your payments to
24 Ms. Jones and Mr. Keough issue, raise for me the question of
25 -- first of all, who was involved in deciding to make those

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1 payments? Do you know who, which particular person on the
2 campaign was involved?

3 A The severance payments, I know that Joe Johnson,
4 the campaign manager, was involved with those decisions. I
5 believe Paul Goldman, who was a consultant to the campaign,
6 paid consultant to the campaign, was involved in those
7 decisions. I'm not sure whether or not the treasurer of the
8 campaign was personally involved, and I'm not sure whether
9 the Governor was personally involved. With respect to the
10 payments to Ms. Jones and Mr. Keough, the people that were
11 involved with charging the campaign, preparing the checks,
12 and signing the checks were Ms. Jones and Mr. Keough.

13 Q Is it fair to say that Ms. Jones and Mr. Keough
14 were therefore involved in the decision to make these two
15 payments that are issued to them?

16 A Absolutely.

17 Q Were they likewise the ones who would have decided
18 whether or not to send a bill, if you will, to the
19 Committee, a written bill or invoice for services rendered?

20 A For their own services, yes.

21 Q Now, I gather that Ms. Jones did send a bill, if
22 you will to the Committee, or prepared a bill that was given
23 to the Committee in case of some of her payments, but
24 apparently not with respect to the \$10,000 payment that is
25 at issue here?

1 A I think Ms. Jones prepared a memo with respect to
2 a \$4,000 payment, post-ineligibility payment, that was made
3 to her. I don't know what time that -- that was prepared.
4 I know there is such a memo. To the best of my knowledge,
5 there was no written bill with respect to the \$10,000
6 payment. Clearly, she was the one who decided to charge the
7 Committee \$10,000 for her services. And, in so doing, and
8 in so making that decision, she then prepared the check and
9 signed the check, which she had the authority to do. So,
10 that -- the expenditure to Ms. Jones, I'm not aware that
11 other people were involved with it, that could very well be,
12 but it would be erroneous to say that she did not charge the
13 Committee for her services in the amount of \$10,000.
14 Because I think that the evidence is that she must have
15 charged them, because she's the one that put together the
16 check and signed the check. And there's no evidence that
17 she was unilaterally instructed to do that without any --
18 without her requesting that payment.

19 Q The other question relates to the fact that,
20 because there were other payments which were made to Ms.
21 Jones, for which we do have some documentation, other than
22 just her own statement which is how this submitted. I think
23 our staff is of the view that those other payments seem to
24 correspond to specific time periods. And that those other
25 payments seem to basically cover the entire time period,

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1 represented by her services during those periods, and that
2 therefore, this \$10,000 payment seems to sort of stick out,
3 if you will, as not necessarily corresponding with any
4 particular time period or stated differently, perhaps it
5 looks like it overlaps with the other time periods, for
6 which billings were otherwise submitted?

7 A Ms. Jones billed the Committee a total of \$16,300
8 for her services, from approximately April 1, 1991 --
9 actually to date.

10 Q You said billed, but --

11 A -- charged. And received payment for it. So
12 prior to the \$10,000 payment of January 29th, she received
13 \$2,300 in payments from the Committee. Her position is that
14 those payments were in partial compensation for the services
15 that she rendered to the Committee to date. She didn't
16 charged the Committee more or at least was not paid more,
17 because of the Committee's financial cash-flow and that she
18 chose to charge the Committee what she believed was the fair
19 market value for her services at the end of January. Taking
20 into account the payments that she had already had made.
21 The already -- that she had already -- that had already been
22 made to her.

23 Q Sounds like, from what you're saying, it was kind
24 of a decision made, that well now that the campaign is over
25 and done with, I want to reassess exactly what my services

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1 up to this point have been worth. And in essence have the
2 Committee pay me for, not just what it's already paid me for
3 the time leading up to this point, but also for what I feel
4 like I demonstrate I have actually provided in services, up
5 to this point.

6 A I think that would be a reasonable assessment.

7 Q Okay, I may want to come back to a different issue
8 later.

9 MS. KERMAN: May I, could I just make one follow-
10 up comment? The concept, apart from Ms. Jones' matter, the
11 concept that campaigns, once they're winding-down or once it
12 becomes apparent that the candidate is going nowhere,
13 receive an influx of bills from individuals who have
14 provided services to the campaign, and for whatever reason
15 had taken their time, maybe just because of procrastination,
16 maybe because they knew that there was no money to pay them
17 at that date, and for whatever reason, will send their bills
18 into a campaign as its winding-down. And often times those
19 bills are in connection with services and goods provided
20 months prior to the actual invoicing, is not an uncommon
21 occurrence, whatsoever. And I think that if the Audit
22 Division reviewed just on random campaigns that there would
23 be a high proportion of bills that would come in -- in the
24 weeks surrounding the termination of the campaign, and a lot
25 of those bills would be for activities that occurred months before.

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1 COMMISSIONER THOMAS: Thank you.

2 CHAIRMAN POTTER: Vice-Chairman McDonald?

3 COMMISSIONER McDONALD: Thank you, Mr. Chairman.

4 Well, first of all welcome.

5 MS. KERMAN: Thank you.

6 BY COMMISSIONER McDONALD:

7 Q Thank you for coming. I'm kind of interested in,
8 this same line of questioning. In my mind, I'm a little bit
9 puzzled. I really think Commissioner Thomas, as well as
10 yourself, came to an agreement on what I think has happened.
11 I gather Ms. Jones, and just looking at our own information,
12 and Mr. Keough, they were working for the Governor and when
13 they -- did they take a leave of absence from the Governor's
14 staff, is that what they did in essence?

15 A No -- no. Ms. Jones -- they both work full time
16 for the Governor. I think that they were, at least I know
17 for fact that there were certain days that we've detailed in
18 our memorandum that Mr. Keough traveled with the Governor on
19 campaign related purposes and took a leave of absence. Ms.
20 Jones work with the campaign was done on her personal time -
21 - nights, lunch, weekends. And she to the best of my
22 knowledge was paid full time by the Commonwealth. She may
23 have, on occasion, taken personal leave, but that was --
24 would be the exception rather than the rule.

25 Q And then Mr. Keough, he took, I gather he took

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1 part of his -- he took part of the time off and part of the
2 time he was on the payroll, is that where we stand?

3 A We -- he was on -- he was a full time employee of
4 the Commonwealth of Virginia. He may have taken some of his
5 personal, or vacation time to engage in campaign related
6 services, but the activities he performed for the campaign,
7 were on his personal time.

8 Q I'm just kind of curious, doesn't that put him
9 automatically on a kind of volunteer status, you see I don't
10 quite understand how he could be, maybe I'm just missing
11 something, but how could he take any other position, other
12 than volunteer status if he was being paid full time by the
13 Commonwealth of Virginia?

14 A To the best of my knowledge, there's no
15 requirement from the Commonwealth of Virginia, that if you
16 work for the Commonwealth of Virginia, you can't have a
17 second source of income, if you're performing services
18 outside of the services you provide for the Commonwealth.

19 Q And so even though he had a full-time job with the
20 Governor, it was assumed by somebody, I gather by the
21 Governor or at least himself, that he was entitled to
22 additional compensation?

23 A It was assumed, I have no knowledge of, that the
24 Governor made this decision. But, he had the expectation
25 that he would be paid for some if not all of the services he

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1 rendered to the campaign.

2 Q So, going back to the point made by Commissioner
3 Thomas, that judgment I gather was made by himself and by
4 Ms. Jones?

5 A To the best of my knowledge, those were the
6 individuals involved in that judgment, correct.

7 Q And there's no contractual obligations that's been
8 signed or any verbal commitments that they had from anybody
9 to anyone, I gather?

10 A Not to the best of my knowledge.

11 Q Just in terms of a general accounting practice,
12 for just a minute, it would seem that it would be somewhat
13 odd, maybe I -- maybe the Audit Division could tell me, but I
14 had -- seems that I agree with you. I think your
15 characterization of what happened to the campaign is
16 absolutely right. And I thought your presentation was
17 extremely good and it was clear that the Governor, I'm sure,
18 surprised lots of people, when he decided to drop out of the
19 race when he did. But, I'm a little bit puzzled in terms of
20 general accounting practice, that you would be able to kind
21 of write your own check, and your treasurer a check. I mean
22 was there not anyone else that was examining that,
23 particularly in view of the fact that there appears to be no
24 legal documentation, or some sort of understanding how this
25 would work?

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1 A First, just to clarify, Ms. Jones was the
2 assistant treasurer of the campaign, so the check that she
3 signed was to herself and to Bill Keough, who was her
4 assistant, there were no payments to the treasurer of the
5 campaign. And --

6 Q Is that the treasurer's knowledge you're saying?

7 A Excuse me?

8 Q That the treasurer was aware of this, and signed
9 off on this?

10 A No, I have no knowledge of the treasurer was --
11 had knowledge of these two payments to Ms. Jones and Mr.
12 Keough prior to the checks being issued.

13 Q But I just wondered as a general accounting
14 principal that maybe I'm wrong --

15 A -- as a general accounting matter, you're
16 absolutely correct, and these checks were not issued in a
17 normal course of the Committees' practice.

18 Q Let me, if I might pursue for just a second, you
19 indicated in your opening remarks, that -- that the \$15,000,
20 the \$10,000 and the \$5,000, that the later concerns was that
21 the Audit Division had in essence, dismissed all of it, but
22 in fact, you thought that if there was some reason for not
23 allowing at least part of it. That part of it ought to be
24 acknowledged and I gather paid. Do you have any sense of
25 what we would base that on or what kind of figures you would

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1 look at, given the circumstances surrounding the money?

2 A Well, given the circumstances, we have submitted
3 to the Audit Division detailed memoranda from both Mr.
4 Keough and Ms. Jones, describing acts the activities they
5 performed for the Committee. And we have supporting
6 documentation for that. I -- it's my recollection that
7 during the 1988 presidential audit cycle, there were various
8 payments for allocation or other reasons that a committee
9 classified in a certain manner and that the Audit Division
10 or the Commission determined that that classification was
11 not entirely correct and made a decision, sometimes the
12 committee argued it was an arbitrary decision, but made a
13 reasonable decision to -- not to --- 100 percent change the
14 characterization or allocation of that particular
15 expenditure, but to split it up on some kind of a pro-rata
16 basis. And the question here is the campaigns in general
17 have been given wide discretion in terms of deciding how
18 much to pay people for services. There isn't a specific
19 list that accountants should pay x-amount per hour and a
20 pollster should be paid y-amount. I think that if the Audit
21 Division questions the reasonableness of these expenses in
22 relation to the work performed, but acknowledges that there
23 was certainly work performed and obviously there was from
24 these people an expectation of payment. That then the
25 burden really would shift to the Audit Division to say well

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1 okay you've proven that they've done so much work, and
2 therefore you know in the Richmond market or in the
3 Washington market a person performing these services usually
4 gets paid x-amount per dollar and come up with some kind of
5 a figure. To summarily dismiss the entire payment seems to
6 be a rather unreasonable approach since the whole question
7 here is reasonableness.

8 Q And then so, help me with reasonableness, what
9 would be reasonable, just so I can follow --

10 A Well, obviously I'm here today representing the
11 Committee, not the Audit Division, and the Committee's
12 position is that these payments were reasonable for the
13 services rendered. So, I'm not really in a position to
14 precisely tell you how to change them. But I think one
15 could glean from the memoranda and other documentation that
16 I've provided, could come out with some kind of reasonable
17 calculation of the amount of services, that these
18 individuals performed and assign based on Department --
19 Labor Department or a temp service, or whatever, an amount
20 per hour.

21 Q Just one other thing if I might. I'm a little bit
22 confused about and maybe you can help me. It seems like
23 that when we talked about the severance pay, and what
24 various individuals arrangements with the Committee were,
25 looking at our documentation, it says very forthrightly I

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1 think, and please correct me if I'm reading something that
2 is incorrect, "The Committee has failed to make available
3 any employment agreements or other documentation
4 establishing that the consultants were entitled to the
5 severance payments" and if I can go on "moreover the
6 Commission concluded that the Committee's contentions were
7 inconsistent with evidence that the Committee stated that
8 six of its consultants began working the Committee again in
9 February of '92" and then we had this severance pay but
10 apparently the individuals were actually compensated through
11 June of '92. I'm not quite following and maybe I'm getting
12 these mixed up, how you would get severance pay if you were
13 still being paid.

14 A That's why, what I've done, which is a little
15 different than the way the Audit Division set this forth is,
16 there are 12 individuals, 12 payments to 12 individuals in
17 question. I've divided it up, and said there are seven of
18 these individuals after they received their so-called
19 severance payment, they no longer received any further
20 payments from the Committee, and no longer worked for the
21 Committee, except they may have helped the Committee on some
22 random -- in response to some random questions or requests.
23 The five other individuals did in fact work -- some -- of
24 them through June for the Committee for compensation, after
25 those severance payments. By dividing it up, I did so with

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1 the understanding or appreciation that the Commission could
2 have a different position with respect to whether the
3 severance payments, paid to the seven individuals who in
4 effect, their arrangements with the campaign were
5 terminated, but whether or not those were qualified campaign
6 expenses, that answer may be different than the answer for
7 the five other individuals. So that's why I divided up in
8 that manner.

9 Q And going back, just so I'm clear, were there any
10 employment agreements at all, with any of these individuals?

11 A No, there were no employment agreements at all
12 with these individuals.

13 Q I mean I do think you're right about, clearly
14 about the nature of campaigns and how they -- how difficult
15 they can be and so on and so forth, but it is also difficult
16 to, without some sort of documentation to reach some of
17 these conclusions, as easily as we would like, and I think
18 the after the fact reassessment of what I may have done in a
19 campaign, particularly when it's not very clear to me that
20 there was, and I understand that to begin with, I think
21 both you and Commissioner Thomas hit on it in your exchange,
22 particularly in relationship to Ms. Jones, and Mr. Keough,
23 I find that arrangement particularly troublesome, since they
24 signed their own checks. That's of some concern to me, but
25 I thank you, I don't have anything else right now.

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1 MS. KERMAN: Could I just make one -- One of the
2 things that I think is important to focus on here and I
3 tried to hit it on a little, with respect to severance, the
4 types of individuals who were receiving these severance
5 payments, is that it is true that your pollster, your media
6 consultant, your campaign manager, these highly compensated
7 individuals, tend to have employment contracts or other
8 contracts with the campaigns -- with the campaigns, that are
9 written by high priced lawyers who include all kinds of
10 termination provisions and other requirements. And the
11 campaign signs them and therefore in those cases I assumed
12 that unless the payments were extraordinary, their
13 termination provision would be accepted. The reality is
14 that most junior-level people, most people who are
15 compensated at the lower scales, are either employees-at-
16 will or consultants-at-will, they don't have agreements, no
17 one's going to -- even if they have the money to go to a
18 lawyer or have someone else prepare an agreement with them
19 that had all kinds of termination provisions and severance
20 payments, no one would sign it. These are the people that
21 really need the severance payments the most, yet they have
22 the least ability to -- and are least likely to have written
23 arrangements that either they request the Committee to sign
24 or even if they do that the Committee will sign, to protect
25 them in this situation, and that's why we think that in

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1 determining whether or not severance payments to these type
2 of individuals aren't qualified campaign expenses, the real
3 understanding is extraordinarily important.

4 BY COMMISSIONER McDONALD:

5 Q Well I think that's a good point, and I -- the
6 thing that strikes me about that is that first of all maybe
7 it's just semantics because I used to do that sort of thing,
8 so I'm up on that. That -- let me make sure I understand --
9 they're categorized as consultants, maybe they're not
10 consultants, was there an oral understanding with somebody
11 and who would it have been with, do we know? I mean --

12 A There was oral --

13 Q There was some oral understanding -- for the
14 amount of compensation, who did they have those
15 understandings with?

16 A The campaign manager.

17 Q With the campaign manager?

18 A Correct. At minimum the campaign manager.

19 Q And the campaign manager's indicated that a --

20 A -- and the campaign manager specifically
21 authorized, matter of fact, it was the campaign manager who
22 put together the list of payments that were to be paid to
23 these individuals, specifically approved.

24 Q And we have that?

25 A We have a list that was approved -- we've given

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1 the list that were put together for payment and that came
2 from the campaign manager I don't know if they were
3 initialed by him or they were put together by his secretary.

4 Q And they would refer to the two assistant
5 treasurers as well?

6 A No, those were the severance payments, those were
7 not payments ---

8 Q -- okay all the severance payments --. I've
9 lumped them together, I apologize -- So on the severance
10 payments and when was that agreement initialed or entered
11 into with the campaign manager ?

12 A The campaign manager decided to make the severance
13 payments in January of '92. I mean he would had to have
14 decided before the checks were issued, and the first checks
15 were issued on January 29. What I -- also can do is get an
16 affidavit, which I can submit during this five-day period
17 from the campaign manager, who is in town, to certify to
18 that. That he specifically approved these payments.

19 COMMISSIONER McDONALD: Thank you.

20 CHAIRMAN POTTER: Thank you, a few more questions
21 if I could. First, Ms. Kerman, can I clarify something?
22 When you started out, you indicated that there were several
23 issues that you were going to discuss, all related under our
24 rules, to the repayment question.

25 A Correct.

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1 Q In terms of the interim report, you have discussed
2 three issues, the severance payments to the twelve
3 individuals, the salary payments to Mr. Keough and Ms.
4 Jones, and the question of the capital asset value of those
5 lease payments.

6 A Correct.

7 Q Are those the only three issues that you dispute
8 at this time in the interim for -- involving repayments?

9 A No, we have -- we have questions with respect to
10 the -- some of the undocumented --- expenses that have --
11 been -- classified as apparent non-qualified campaign
12 expenses, and I'll be submitting some additional
13 documentation with respect to those issues during the five-
14 day period. In addition, we have some additional
15 information regarding the computers and therefore, the
16 information that may change the NOCO. We will also be
17 providing that during the five-day period and after that we
18 know that we are under a continuing obligation to provide
19 the Audit Division with information that affects the NOCO,
20 and we will continue to do that.

21 Q Thank you. In terms of the severance payment
22 issue, could you again, or could perhaps I give you and you
23 just confirm the names of the employees who you had
24 classified as the seven who received severance payments, and
25 ceased work. So, it was their final payment and they left

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1 the campaign, that would be Scott Bates, Sarah Callahan,
2 Eric Easter, John Hotchkiss, Herman Stevenson, James
3 Thompson. And you mentioned another name which was not --

4 A John -- the name I mentioned was John Brazell, he
5 received a \$2,000 payment on February 19th, 1992 that
6 specifically says on the check "severance payment." I think
7 some of the confusion may come into play is that he --- it's
8 my recollection, that he, during that month of February
9 actually did a fair amount of work for the campaign. So,
10 there might be some confusion about whether or not he was
11 just a regular person working for the campaign or whether
12 that was a severance payment. I put it down here as a
13 severance payment, since the check itself does say severance
14 payment on it.

15 Q Then there were --

16 A -- Truth, I may have confused -- I may have caused
17 some of that confusion because I think at some point we
18 submitted something to say that he was still working for the
19 month of February.

20 Q Then there were the five individuals who received
21 severance payments, so denominated on the checks, but
22 continued to work for the campaign, India Adeos, Nicholas
23 Perrins, Adam Slate, Antoine Smith, and Jeremy Wiley.

24 A Correct.

25 Q You've indicated that you think it is possible the

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1 Commission might take a different view of those five than
2 the other seven, on the basis that after receiving the final
3 severance payment, they continued to receive other payments
4 from the campaign?

5 A That's right, my view is that for these five
6 individuals, if you look at the amount that they were
7 compensated in total by the campaign, it was quite
8 reasonable in connection with the work they perf -- services
9 that they performed for the Committee, which I know has been
10 always one of the tests used by the Commission, but -- but -
11 - for ease of argument --- I have divided them up. And --

12 Q I just wanted to figure out what your position was
13 at this time. The five who kept working, and if I
14 understood you correctly, you still believe those severance
15 payments should be qualified campaign expenses even though
16 they didn't sever anything?

17 A That's right, because they were-- even though
18 they're classified as severance payments they received these
19 monies in negotiation with the campaign manager who was
20 negotiating with them to stay on and perform services in
21 connection with the wind-down, and therefore, in determining
22 their salary post -- post January 29th, and post February
23 15th whatever salary, he took these payments into account in
24 determining that compensation. And therefore for those
25 people I'm looking at a test of-- I mean how much they were

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1 paid in total by the campaign and what the value is of the
2 services that they provided.

3 Q Did their salary change, pre and post-severance
4 payment, did it go down after the severance payment?

5 A By and large, it stayed the same, one or two of
6 the individuals may have actually received a slight raise.
7 Actually I can tell you precisely, India Adeos, her salary -
8 - this was a semi-monthly salary, was \$750, remained at
9 \$750; Nicholas Perrins, he was paid a \$600 semi-monthly
10 salary, he after February, in fact February 1st, he was paid
11 on an hourly basis for services he rendered in connection
12 with the audit. The same is true for Adam Slate. Adam
13 Slate was paid \$400 on a semi-monthly basis and after
14 February 1st, he was paid on an hourly basis, based on
15 services performed, and he submitted invoices. Antoine
16 Smith was paid \$500 continuously on a semi-monthly basis.
17 Jeremy Wiley's salary went down. He just started with the
18 campaign actually in January, right when the campaign
19 ceased, he -- at the beginning was paid \$935 a month for two
20 months. That went down to \$731 and then it leveled off at
21 \$835, again those were semi-monthly payments.

22 Q And though you refer to these as salaries, they
23 were all --

24 A Consulting fees.

25 Q Consultants. Okay, did the campaign have

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1 employees on a standard employment or consulting contract,
2 or did the campaign have such a contract?

3 A No.

4 Q In terms of the Keough and Jones payments, which I
5 understand you've separated out as different classification
6 of payments, did those checks say anything on them by way of
7 notation, either of them, for their purpose?

8 A No. They absolutely do not say severance on them.
9 They said Ruth Jones's \$10,000 check said a memo entry
10 salary/consulting fee. Bill Keough's check said salary.
11 And I move to clarify one thing, these checks, I believe in
12 response to a question by Commissioner Thomas, I said that
13 the treasurer was not aware of these payments, which I still
14 believe to be true, prior to them having taken place, the
15 checks say on them -- have in writing, approved Joe Johnson,
16 who is the campaign manager. I have no knowledge when that
17 was written, but they do say approved Joe Johnson on both
18 checks. That's his -- appears to be his writing.

19 Q Was Mr. Keough's payment, I understood the Ms.
20 Jones situation but, for the Keough payment, was a bill
21 submitted by him?

22 A No.

23 Q And that check was --

24 A Not to the best of my knowledge.

25 Q And the check was drawn the same day as the Jones

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1 check?

2 A Yes, they're both the 29th, January 29th 1992.
3 And they're consecutive checks, -- numerical order.

4 Q In your opinion, either as to the severance
5 payments or the Jones and Keough payments, was the Committee
6 under any legal obligation to make these payments? Was
7 there a right to receive this money, that could it have been
8 enforced legally?

9 A Well, yes because, with respect to the severance
10 payments, and other payments there was oral assurances,
11 putting aside the Ruth Jones and Bill Keough payments, with
12 respect to the severance payments, there were apparently
13 oral assurances by at least the campaign manager if not
14 others in campaign management indicated -- these people when
15 their compensation arrangement would be terminated by the
16 campaign. There was an expectation when these people went
17 to work for the campaign, obviously that they would be
18 compensated at least through mid-March. Now, I don't know
19 precisely every oral statement that was made with respect to
20 this, so you could potentially get into conflict over
21 whether an individual said that they were promised and what
22 the campaign management would say that they said, there was
23 no written documents, to the best of my knowledge. But,
24 sure, you know, as we're all aware, oral agreements are
25 enforceable.

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1 CHAIRMAN POTTER: Vice-Chairman -- do you have a
2 question?

3 COMMISSIONER McDONALD: No, I apologize, I want to
4 go back to the lease arrangement. No I'm sorry.

5 CHAIRMAN POTTER: If I could just finish, it's
6 okay. You said in response to the question from the Vice-
7 Chairman about who approved these checks and whether this
8 was the campaign's normal way of doing, you know whether
9 there was normally some sort of an approval process that
10 these checks didn't follow?

11 A The Jones and Keough checks?

12 Q Yes. Give you , to clarify that. What I had
13 heard you say is these two checks were not issued in the
14 normal course of the Committee's practice. Wouldn't that
15 raise a question as to whether they were normal qualified
16 campaign expenses if they're not issued the way other checks
17 were?

18 A That may raise an issue but, to counter that,
19 would be evidence that the individuals in question did
20 perform services -- that they expected to be paid for by the
21 campaign and Ms. Jones did have, was the assistant treasurer
22 of the campaign and she did have the authority to write and
23 sign checks, and to pay bills. So, and there was no written
24 policy that said she couldn't sign a check to herself. So
25 she could --

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1 Q That she could or couldn't?

2 A --well that clearly is not how one would want
3 things to happen. I'm not -- it's entirely possible that
4 she was never specifically told she could not in effect pay
5 her own bill. And because she had authority to pay bills,
6 she very well might think it perfectly reasonable to pay her
7 own bill.

8 Q But there is no bill here?

9 A Correct, but pay her own charges.

10 Q I don't want to do a L.A. Angels dance on the head
11 of a pin routine, but your earlier statement, and I don't
12 want to put words in your mouth, so it may have been -
13 Commissioner Thomas's earlier statement, there was a sort of
14 meeting of the minds out here about how all of this might
15 have come about and the language used was "well she billed
16 the Committee". Well our auditors say she billed them
17 twice, once for 2300 for her work up through January '92 and
18 then a second bill for January through May for \$4,000.
19 Those are two separate bills?

20 A Right. And again those other payments, which are
21 actually several payments combined, the \$2,300, to the best
22 of my knowledge, those were not, there were no written bills
23 also with respect to those payments. Audit Division can
24 correct me if I'm wrong, but I have no recollection of there
25 being written payment --written bills.

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1 CHAIRMAN POTTER: Tom Nurthen?

2 MR. NURTHEN: The compensation received from the,
3 I believe point in time in September '91 through December of
4 '91, she received a bi-weekly paycheck, and on the same
5 dates as the other staff were being paid.

6 CHAIRMAN POTTER: And for the period after
7 December '91, January '92 through May of '92?

8 MR. NURTHEN: January '92 through April, she
9 billed the Committee in May for \$4,000, \$1,000 a month.

10 CHAIRMAN POTTER: In writing, when you say bills?

11 MR. NURTHEN: Yes, there is a written bill in May
12 and she was paid in May, and \$1,000 a month roughly equated
13 to what she was being paid bi-monthly September through
14 December.

15 CHAIRMAN POTTER: Well, here is my concern, it
16 looked as if there was a pattern of paying her and as that
17 statement would indicate that it was a bi-weekly salary
18 check for the first part of the campaign and then in
19 response to a written bill with \$1,000 a month for the
20 second part, and then you have this single \$10,000 payment.
21 Now, the statement made in the colloquy with Commissioner
22 Thomas was that she might have, the campaign might have
23 incurred bills to her, meaning she had worked for them a
24 considerable amount of time but, she didn't charge them for
25 that at the time, because of the campaign cashflow. She

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1 recouped that in January when the candidate was no longer a
2 candidate and the campaign had cash.

3 MS. KERMAN: Correct.

4 CHAIRMAN POTTER: You don't think that would
5 constitute some sort of contribution to the campaign, or
6 loan to the campaign of that \$10,000 that she chose not to
7 bill it if she was holding it out?

8 MS. KERMAN: She could have converted -- if she'd
9 performed services for the campaign, she could at any time
10 convert them to voluntary services. And she did in fact do
11 that for services that she's rendered to the campaign
12 subsequent to May of -- April or May of 1992. She has one,
13 payment for \$4,000 for those four, first four months of '92
14 and then subsequent to that she has done work as a
15 volunteer, they've done work for the campaign, and in her
16 affidavit, she says that any of her work that she does for
17 the campaign she specifically converts to voluntary
18 services.

19 CHAIRMAN POTTER: In your view, does that process work
20 in reverse? Could she convert what was a volunteer service
21 to service for which she should be paid?

22 MS. KERMAN: Well, she never specifically told the
23 campaign that it was a volunteer service. She just never
24 billed the campaign for it.

25 CHAIRMAN POTTER: The campaign was paying her

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1 bills on a bi-weekly basis.

2 MS. KERMAN: The campaign was paying charges to
3 her on a bi-weekly basis. But, she in effect in January did
4 a reconciliation of what she had been paid, and they weren't
5 pursuant to bills, what she'd been paid and found in her
6 judgment the campaign to still owe her for services rendered
7 and additional \$10,000.

8 CHAIRMAN POTTER: Good answer, thank you. Mr.
9 Vice-Chairman?

10 COMMISSIONER McDONALD: Thank you, Mr. Chairman.

11 BY COMMISSIONER McDONALD:

12 Q Leslie, I forgot then the Chairman's summation,
13 and made me think about it a little bit. I would like to go
14 to the lease arrangement for just a minute. See if I
15 understand. The Committee ultimately purchased the
16 equipment, did it not?

17 A For just the computers, correct.

18 Q And what you're saying is that as long as it was
19 in a lease mode, those monies shouldn't be counted as
20 capital assets because in fact the Committee did not in
21 essence have control of it, they were merely leasing the
22 equipment?

23 A Correct, when the lease was entered into, there
24 was no expectation or decision made that the equipment would
25 ever be purchased. It was a pre-ineligibility lease that was

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1 entered into. And the Committee was obligated under this
2 lease to make payments.

3 Q I gather though that you couldn't have purchased
4 the equipment unless you had in the agreement the ability to
5 purchase the equipment?

6 A I don't know if you couldn't have purchased it?

7 Q I mean, I gather it was a lease-purchase agreement
8 in essence, because that's ultimately what you had?

9 A It's my understanding that it's a -- it was a
10 lease and there was some type of a buyer provision. One of
11 the unfortunate situations right here is that we are all --
12 in discussing this transaction we're all going by the
13 multiple invoices, which are very descriptive, that are
14 issued by the computer company. But which clearly says that
15 there's a payment that's very detailed and says lease buy-
16 out and that's the payment that saved us the purchase of the
17 computers.

18 Q I guess, and I'm not sure any of my colleagues
19 would consider this a very good analogy, but to me it's
20 almost like testing the waters. You can test the waters,
21 and you can take in monies and so on and so forth, but if in
22 fact you decided to proceed, they count against what you're
23 doing. I don't -- I really have a little trouble to be
24 honest, taking the position that monies that you used to
25 obtain a capital asset, do not reflect a capital asset

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1 status. Because otherwise you wouldn't be able to have the
2 capital asset. If you went in and you said gee I'll give
3 you this, then obviously you would not have put up enough
4 money to have the asset. It seems like to me that if you're
5 paying for it all along, now if you're in a lease
6 arrangement and you get to the end, and you don't take
7 advantage of the buy-out provision, I think you're
8 absolutely right. But, it's a little hard and maybe I'm
9 just, I'll reflect on it more and maybe you or my colleagues
10 or the Audit Division can give me some guidance. But, it
11 seems like to me, that if you were able to apply monies used
12 and there's lease buy-out agreement it seems like that,
13 that's -- I don't know, seems fairly clear that you'd almost
14 have to categorize that as an asset?

15 A If that is then in fact the Commission's position,
16 and there's a secondary issue --

17 Q Well, I don't know that it is --

18 A Okay, but if --

19 Q --it's my question that I'm concerned about?

20 A Assuming argumentative that that would be the
21 Commission's position, would --what happened was the
22 Committee purchased those four computers and some related
23 equipment, ultimately the Committee because the computers
24 were assets and the Committee has very few assets at this
25 point, the Committee has taken those computers and used them

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1 to pay individuals for services rendered to the campaign.
2 Documentation has been already provided with to the Audit
3 Division with respect to the transfer of two of the
4 computers and that's been approved to Joe Johnson, and
5 that's been approved by the Audit Division and there will be
6 documentation provided to the Audit Division with respect to
7 the transfer of the other two computers in our submission
8 next week. Now, for purposes for determining what that
9 qualified campaign expense is when the transfer takes place,
10 what the Audit Division has done, at least for the two
11 computers that already have been transferred is they've
12 looked at the amount of money that was paid, the purchase
13 amount under the lease buy-out and that pro-rata is the
14 amount of money that they're giving credit for when you
15 transfer the computer. So in effect you have the asset up
16 here and that's how you get rid of the asset at the bottom
17 of the NOCO is by that transfer. They haven't included in
18 that calculation the amounts of money that they say
19 represent the lease -- pre-paid lease payments that also are
20 part of this computer -- these assets. Do you understand
21 that at all. Okay so what we're saying is since we have in
22 fact, we have transferred, we no longer own any of the
23 computers, we've transferred them to individuals for
24 compensation for services rendered, and we have bills, and
25 we have proof of all of that. If the Audit Division is

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1 going to take this total number, this \$15,000 number,
2 basically divide it by four, and give you credit in that
3 amount for each computer you transferred, then that's fine,
4 because that will wash-out, wash-out the computers and wash-
5 out the transactions for NOCO purposes. But if you're only
6 going to get credit based on the lease buy-out, the \$6,000
7 figure then there's -- then the \$8,000 figure, which
8 represents the pre -- pre-paid lease payments, there's no
9 way to get rid of that asset, it's a non-tangible asset that
10 we can't get rid of. So that's what seems very unfair,
11 there's nothing in the regulations that would contemplate
12 being -- the calculation that you would have an asset --
13 capital asset for NOCO purposes that's intangible, you can't
14 get rid of it. So that's our problem, if it's the
15 Commission's wisdom to just combine the payments and then
16 divvy them up when we transfer the computers, then that's
17 fine, but the net results of what sounds really technical in
18 accounting is that unless this problem is addressed we are
19 going to have to come-up with \$8,500 that we don't have, and
20 as you know it's very difficult to raise money for a
21 defeated presidential campaign, particularly when your
22 candidate is no longer an elected official. For something
23 that just doesn't seem right or based on any kind of
24 regulations, and for what we can really see no precedent. I
25 mean there -- I know the regulations contemplate if you make

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1 a refundable deposit payment, but that's a capital asset,
2 but that's because you can get the money back, we can't get
3 the money back, for the lease payments. We made them
4 pursuant to a lease agreement, so we have to have some way
5 to get rid of that asset.

6 COMMISSIONER AIKENS: Can I ask a follow-up
7 question?

8 CHAIRMAN POTTER: Commissioner Aikens.

9 BY COMMISSIONER AIKENS:

10 Q Leslie, you said that you transferred these
11 computers or you gave them to employees for compensation,
12 what was the value of the compensation that you gave them?

13 A We, all the employees -- for our purposes we took
14 the large number, the \$15,000 number and then divided it by
15 four for purposes of valuing that they had to provide us
16 with \$4,000 whatever, worth of services to get these
17 computers. We took the larger figure, but we're not
18 getting, we haven't got credit for it. For example, Joe
19 Johnson, he was owed \$50,000 by the campaign, we in effect,
20 we paid him -- I think there was an agreement -- there was
21 all kinds of documentation, that was excepted. We paid him
22 either \$35,000 or \$37,000 in cash. We also gave him -- what
23 we originally thought were two computers, but ultimately we
24 found out we gave him three computers. And they are valued
25 at this higher number, and then that still doesn't come down

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1 to his total his \$50,000 and then converted the remainder to
2 voluntary service.

3 Q So the campaign valued the asset, the computers,
4 at \$15,000?

5 A We took the conservative position, because we
6 needed to -- right, and I mean -- if the campaign, if the
7 Commission wanted to value them at less, that's fine, as
8 long as it just washes out if you're not considering the
9 pre-paid lease payments an asset, it's really irrelevant.

10 Q Well, in valuing them at \$15,000 you obviously
11 were considering the lease payments?

12 A Right -- we were trying to protect ourselves
13 either way, depending on which view the Commission took.

14 COMMISSIONER AIKENS: Thank you.

15 CHAIRMAN POTTER: I think this would be a good
16 moment maybe to see if, either the Audit Division or other
17 Counsel's Office had any questions they wanted to pursue.
18 The Audit staff is represented by Tom Nurthen and Rick
19 Halter; and the Counsel's Office is represented by James
20 Portnoy and Kim Bright-Coleman. Let's start with Audit? Do
21 you have questions either of -- on any of the issues that
22 we've discussed that you wanted to clarify?

23 MR. NURTHEN: I would like first clarified, the
24 computers buy-out and the pre-paid lease payments. Section
25 9034.5 of the regulations defines a capital asset. And it

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1 finds any asset purchased for a price in excess of \$2,000.
2 On January 29th, the Committee paid Fairfax Computer the
3 \$6,900 figure for the buy-out. On January 29th the
4 Committee also paid Fairfax Computer \$2,800 twice, which
5 represented pre-paid lease payments. The first pre-paid
6 lease payments was from mid-January to mid-February, the
7 second pre-paid lease payment was from mid-February to mid-
8 March. When they entered into this agreement, they paid on,
9 I believe it was October 25, 1991, \$2,700 which represented
10 the final lease payment. That being a payment from mid-
11 March to mid-April. Now standard accounting practice will
12 classify any pre-payment as an asset. So therefore, any
13 pre-payment on a balance sheet would be an asset to a
14 company, and in this case, the initial pre-payment of \$2,700
15 exceeds the \$2,000 threshold of a asset to be classified as
16 a capital asset, as well as, the two pre-payments on January
17 29th, they were both in excess of \$2,000. All three pre-
18 payments relate to the purchase of the computers, the
19 assets. I don't want to bet, but I would be willing to say,
20 that if the pre-payments were not made the Committee could
21 not purchase those assets at \$6,900.

22 So, we feel we have standard accounting practices
23 on our side and we have the regulation that identifies what
24 a capital asset is.

25 Then, I remember the situation with Joe Johnson,

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1 he I believe billed the Committee \$50,000, and when we
2 questioned it, he said well the Committee only paid him
3 \$35,000 or maybe it was \$37,000. There was also a payment
4 to Mr. Johnson, and I believe it was in excess of \$5,500,
5 for expenses. There was no documentation for the expenses.
6 In response, we were told that the Committee paid \$37,500
7 and then for the difference we gave Mr. Johnson two
8 computers, which is now three computers. Well, you take the
9 value of the computers and the payment to Mr. Johnson, it's
10 still short of the \$55,000 figure, but we wrote it off and
11 said fine, now if it's \$3,000 or three computers that would
12 be roughly \$12,000 then you're right about in the ball park
13 of the \$55,000 bills. So therefore the Committee does
14 recover these computers at any rate, and if you certainly if
15 you use the \$15,000 capital asset figure they did recover
16 \$12,000 of that, and an in-kind, so to speak payment to Mr.
17 Johnson.

18 CHAIRMAN POTTER: Ms. Kerman?

19 THE WITNESS: I don't have those particular NOCO
20 papers in front of me, but the amount that we were given
21 credit for, for the computers was not based on half of the
22 \$15,000 number, it wasn't a \$7,000 number for the two
23 payments, it was a much less number. And it was my
24 understanding, which I clarified, that it was because it was
25 based on dividing up that one payment, the buy-out payment,

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1 not the pre-paid lease agreement.

2 MR. NURTHEN: No, I don't believe we would handle
3 it in that fashion. The Committee really received a break,
4 and if it was just the \$6,900 figure and divide into
5 computers, just \$3,500 then we would be saying, okay the
6 \$37,000 cash payment and the \$3,500 in-kind payment, all
7 right it justifies the \$55,000 bill for NOCO purposes, and
8 whether you add the \$6,000 or the \$14,000 it seems to wipe
9 it out.

10 THE WITNESS: I will go back and check, I don't
11 believe it will wipe it out. I will be totally amenable that
12 if we could just work it out so that -- that the capital
13 asset figure of \$15,000 some odd dollars to some extent that
14 we have transferred all of those computers and all of that
15 equipment, that it's wiped out by those payments, then
16 that's perfectly fine with us. But, I don't think right
17 now, that's the case.

18 COMMISSIONER POTTER: As you've noted, you'll have
19 an opportunity if you want to go back and look at that, it's
20 entirely appropriate.

21 THE WITNESS: Right.

22 COMMISSIONER POTTER: Other issues from Counsel?
23 I'll give Audit a chance to come back but, Counsel would you
24 like to raise --

25 MS. BRIGHT-COLEMAN: I have a comment and a couple

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1 of questions. This has been very helpful, to help focus,
 2 and to really try to understand, and see to the problems
 3 that we face in trying to make these decisions. But, I
 4 wanted to point out in reference to something that you
 5 mentioned, I'm sure that you understand that as a publicly
 6 financed campaign the Committee has the burden to
 7 demonstrate that a particular expense is a qualified
 8 campaign expense. And therefore, it's not incumbent upon
 9 the Audit Division or the Commission itself to come-up with
 10 or devise a figure to justify ---

11 THE WITNESS: Oh, absolutely, I agree with that,
 12 but under this -- situation -- and I think we're talking
 13 about the Ruth Jones, Bill Keough payments or any other
 14 payments that the Committee -- that the Audit Division or
 15 the Commission --

16 MS. BRIGHT-COLEMAN: --or anything--

17 THE WITNESS: -- whether or not those payments are
 18 reasonable. If you say that a particular expenditure is --
 19 prohibited, impermissible, per se unreasonable, that's one
 20 thing, but if you say well if you acknowledge that there
 21 were some services provided, but that you don't feel that
 22 the amount that was paid for those services is a reasonable
 23 amount maybe it's excessive, then I would think it would be
 24 incumbent to propose another amount. The other, I mean -- at
 25 least to tell the Commission, at least to tell the Committee

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1 what standards that you would use in calculating a
2 reasonable amount, because otherwise we would just resubmit
3 numbers to you.

4 MS BRIGHT-COLEMAN: I think I would have to
5 disagree with what you're saying. Part of the problem we
6 have here and is in this part is demonstrated by the
7 discussion here today has been a lack of documentation. We
8 don't for example, with respect to the severance payments,
9 have documentation from the Committee that demonstrates, who
10 made these decisions to make the payments, we don't have
11 affidavit from the individuals who received them, we don't
12 have a lot of information as to exactly how the decisions
13 that -- went into the making these severance payments were
14 made. And also have facts that look as if they're
15 inconsistent with, or that are inconsistent with the
16 argument that these are even severance payments to begin
17 with. And you indicated in your response to Commissioner
18 McDonald for example, that you were thinking about
19 submitting a affidavit or a statement from the campaign
20 manager, which would be maybe the first time that we see
21 something from the campaign that explains the decisions
22 behind this -- my question is, are you also thinking about
23 getting, are you planning on getting that documentation and
24 are you also planning to get any affidavits from the people
25 who actually received the severance payments, to indicate

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1 their understanding and also what their responsibilities
2 were?

3 A Since I think then I can construe that as that may
4 be helpful, I will certainly try to get those affidavits.
5 We did provide list to the -- Audit Division of those
6 payments and the rationale for those payments. They were
7 submitted by counsel, you know, in other cases where we
8 submitted, we submitted in this campaign and other
9 campaigns, we submit things and they're signed by
10 individuals you know after the fact, they're given this
11 exact same way to -- submissions by counsel on behalf of the
12 Committee. So, we didn't submit an affidavit, but we're
13 more than -- we will certainly do that in the next week --
14 in the next week. I think though, that we couldn't submit
15 written documents that described employment agreements
16 because none exist, nor did any bills or employment
17 agreements exist with respect to the numerous payments made
18 to these individuals pre-ineligibility or payments made to
19 these individuals certain of these individuals post-
20 ineligibility for winding-down costs. But, those were all
21 accepted as qualified campaign expenses. So, the only que -
22 - the only payments that have been questioned because they
23 don't have documentation, are these severance payments. All
24 the payments prior to that and all the payments after that
25 have been accepted based just on schedules from the

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1 campaign, the signed checks, it's just these severance
2 payments.

3 Q I think part of the difficulty though without some
4 kind of explanation on the record, with respect to these
5 matters, is for example even here today on one hand you are
6 trying to say that there are no agreements, there's nothing
7 to really demonstrate or document that these agreements were
8 made, and yet on the other you are saying that they are
9 enforceable, that these are things tha --

10 A -- they may be well--

11 Q --nothing to support that --

12 A --they could be enforceable because of oral

13 discussions that took place between Committee management and
14 individuals working for the campaign.

15 Q Let me, if I may also ask another question with
16 respect to the computers and the documentation -- lack
17 thereof, perhaps, basically one of the problems that seems
18 to have arisen during this audit is really a determination
19 of how to value the computers, at the time that the
20 Committee purchased it. And what we have does not indicate
21 basically how the agreement was made with the company that
22 the Committee leased the computer from. Do you have
23 information on what the terms of the buy-out were and was
24 that the information you're planning to submit, you had
25 mentioned that you were going to submit information within

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1 five days --

2 A We have a detailed bill that the Audit Division
3 already has from Fairfax Computers, it's dated January 22,
4 the details, the components of the buy-out. It's a detailed
5 invoice and that has been in the possession of the Audit
6 Division for a while.

7 Q Were you planning, you mentioned though that you
8 were going to submit additional information to -- what would
9 that information go to?

10 A With respect to the computers?

11 Q Yes, you did. In response to Chairman Potter?

12 A Well, I don't know if said it specifically with
13 respect to the computers, the only -- I said that I was
14 going to be submitting additional documentation with respect
15 to other disbursements that had been -- that we haven't
16 discussed here today but that were listed as apparent non-
17 qualified campaign expenses. With respect to this -- the
18 computers, though what I'm going to check, and I'm sure Tom
19 is going to check the work papers, about how the computers
20 were classified when they were transferred. The other
21 information that I am going to submit is in connection with
22 the transfer of the two outstanding computers.

23 COMMISSIONER POTTER: Tom Nurthen?

24 MR. NURTHEN: Just for clarification, the asset
25 valued at \$15,400 and some dollars and there is a liability

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1 that we consider accounts payable for qualified campaign
2 expenses in the same amount on the NOCO statement and it is
3 included in accounts payable.

4 MS. KERMAN: That's correct, but that doesn't wash
5 it out. When you usually make an expense, when you usually
6 pay for an expense, it's not also an asset, so it's just --
7 to -- for this transaction to be just like any other payment
8 for NOCO purposes, the transaction itself has to be a
9 qualified campaign expense. Then because we're purchasing
10 an asset, then it's up here also as an asset and then for it
11 to be taken out you keep the asset, and then you continue to
12 have an asset, or you transfer the asset, and you have to
13 have another entry to get rid of that asset, when the
14 transfer takes place.

15 CHAIRMAN POTTER: Isn't that what you did by then,
16 having got the asset, you transferred it in lieu of cash to
17 individuals to whom you owed money?

18 MS. KERMAN: Right, but for the two computers that
19 we've already given evidence that we've transferred, the
20 amount that we were given credit for in the transfer was not
21 commensurate with the amount --the asset categorized for --
22 for NOCO purposes because --

23 CHAIRMAN POTTER: --the 15,000 --

24 MS. KERMAN: --right, for -- it was approximately
25 a quarter of the lease payment as opposed to a quarter of

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ATTACHMENT 4
Page 64 of 67

1 the \$15,000. But obviously that's totally convertible when
2 we both go back and look at our --

3 CHAIRMAN POTTER: You'll need to, I think we
4 understand the issue, what we're not clear on is how it
5 comes out at the bottom line and I think I can -- provided
6 that you can clarify that, that would be fine. Are there
7 any other questions while we have Ms. Kerman here? Thank
8 you very much for coming. Is there anything further you
9 want to say as we close?

10 MS. KERMAN: I guess the only thing that I would
11 again leave with is that although the issues raised here
12 today the two the Commission, the Committee feels the
13 strongest about are the NOCO effect with respect to the pre-
14 paid lease agreements on capital assets and the severance
15 payments made to individual, seven individuals who no longer
16 work for the campaign, and were no longer compensated from
17 the campaign after the making of those payments. The
18 Committee again, in making those payments thought that it
19 was doing the right thing, that it was doing nothing
20 prohibited by the regulation and the result of continuing
21 the classification of those \$10,900 in payments as non-
22 qualified campaign expenses, the penalty for the Committee
23 is extraordinary, over \$14,000. And so I would hope that
24 you would take that into account in your consideration.
25 Thank you very much.

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ATTACHMENT 4

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1 CHAIRMAN POTTER: Thank you. Commissioner
2 Thomas?

3 COMMISSIONER THOMAS: Just, I'm wondering are you
4 aware that the decision reached in the Convention Committee
5 audits whereby we're addressing the gifts that were given to
6 some of the campaign workers? We ultimately had to question
7 whether or not some of -- some gifts that were purchased and
8 given to some of the people working for the Convention
9 Committee could be considered qualified campaign expenses
10 under the convention public funding system and some of them
11 seemed a little large to us, so what we ultimately did after
12 much sausage-making, was come-up with what we thought was a
13 reasonable number, dollar amount, in terms of what should be
14 considered legitimate qualified campaign expenses. And that
15 was the process that we used there, so.

16 MS. KERMAN: I'm not familiar with the specifics
17 of that matter, but I think that if you look at the
18 reasonableness of the severance payments, the dollar amounts
19 involved, and the fact that at least in part they weren't
20 just totally for doing nothing. There was some
21 consideration, I would hope that those payments would be
22 considered reasonable also.

23 CHAIRMAN POTTER: Vice-Chairman?

24 COMMISSIONER McDONALD: Thank you very much, Mr.
25 Chairman. You've been very patient since you tried to wrap

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ATTACHMENT 4
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1 this up. I think the point really is not the amount, but
 2 going back to Kim's point, the problem is really having a
 3 definition and documentation. I would concur with you that
 4 the overall amounts vis a vis, the kind of things that we
 5 see in these matters, is relatively insignificant. But, the
 6 bottom line is, I'm not clear that that's really the issue.
 7 I don't see how it can be the issue for us without some
 8 fairly specific documentation, because otherwise there is no
 9 way to monitor any of this, it like seems to me.

10 MS. KERMAN: Vice-Chairman McDonald, we gave the
 11 Audit Division the documentation that we had available.
 12 After this meeting, I will be on the phone and I'll be
 13 getting more documentation.

14 CHAIRMAN POTTER: Thank you. Thank you very much,
 15 for coming. We appreciate it. This special meeting of the
 16 Commission is adjourned.

17 (Meeting adjourned at 11:50 a.m.)

18 //

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DOCKET NO.: Agenda Document No. 94-112
CASE TITLE: Oral Presentation-Wilder for President Committee, Inc
HEARING DATE: October 5, 1994
LOCATION: Washington DC

I hereby certify that the proceedings and evidence are contained fully and accurately on the tapes and notes reported by me at the hearing in the above case before the Federal Election Commission.

Date: October 5, 1994



Official Reporter
Heritage Reporting Corporation
1220 L Street, N. W.
Washington, D. C. 20005

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FEDERAL ELECTION COMMISSION
WASHINGTON DC 20463

BJ006063

September 21, 1994

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

THROUGH: JOHN C. SURINA
STAFF DIRECTOR

FROM: ROBERT J. COSTA
ASSISTANT STAFF DIRECTOR
AUDIT DIVISION

SUBJECT: WILDER FOR PRESIDENT COMMITTEE, INC.
RESPONSE TO THE FINAL AUDIT REPORT

In its response to the final audit report, the Committee specifically disputes the six recommendations including the non-repayment issues. The Committee incorporates by reference its previous responses to the matters addressed by the six recommendations.

It should be noted that at the Open Session Meeting on April 21, 1994, the Commission granted the Committee an additional opportunity to address non-repayment matters involving the Commonwealth of Virginia. However, the Audit staff will make no comments with respect to the Committee's response to Recommendation #1 (Excessive Contributions) and Recommendation #2 (Prohibited Contributions). In the opinion of the Audit staff, consideration of the Committee's response should be limited to transactions involving the Commonwealth of Virginia (Finding II.D.) and the repayment matters noted in Section III. of the final audit report.

The Committee submitted additional documentation and comments with respect to Findings II.D. Transactions Involving Commonwealth of Virginia, III.A. Determination of Net Outstanding Campaign Obligations, III.C. Apparent Non-Qualified Campaign Expenses, and III.D. Matching Funds Received in Excess of Entitlement.

Our analysis of the Committee's response with respect to the additional documentation and comments provided is detailed below.

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1. Finding II.D. - Transactions Involving the Commonwealth of Virginia

In its response to the final audit report, the Committee disputes the Audit Division's recommendations that it pay the Commonwealth of Virginia \$30,848 (see Recommendation #3 and Recommendation #4). The Committee incorporates by reference its response to the interim audit report and states that "to the best of its knowledge, it has made all payments required by the Commonwealth of Virginia for goods and services utilized in connection with the presidential campaign."

The Committee contends that the amount of non-qualified campaign expenses identified by the Audit staff (\$5,316) relevant to transactions involving the Commonwealth of Virginia should be deducted from any outstanding amounts due the Commonwealth. Further, the Committee states that the \$5,316 "should not be considered non-qualified campaign expenses for which a repayment to the U.S. Treasury is required."

The Committee states,

"...that the Commonwealth of Virginia should be treated as any other single vendor..." and, "...that payments to a single entity must be treated and reconciled in their entirety - with underpayments and overpayments/unnecessary payments simply offset against each other to determine whether there exists a surplus or deficit position."

After reviewing Counsel's comments, the Audit staff maintains that expenditures, totaling \$5,316, represent non-qualified campaign expenses. Further, the value of the non-qualified campaign expenses (\$5,316) should not be "offset" against the amount due to the Commonwealth of Virginia (\$30,848), since the expenditures do not represent "unnecessary payments or overpayments."

It should be noted that the \$5,316 addressed by the Committee is comprised of \$2,532, representing the value of undocumented charges on the Commonwealth's credit card and \$2,785, representing the costs of trips aboard the Commonwealth's plane that were not campaign-related (difference of \$1 is due to rounding).

The Committee has not documented \$2,532 in credit card charges and thus, has not established whether the expenses incurred were for qualified campaign expenses.

It is the opinion of the Audit staff that the Committee paid the amount billed by the Commonwealth which represented specific charges on the credit card. Therefore, no overpayment exists. Simply because the Committee is unable to document the charges does not justify deducting the undocumented expenses from the amount due to the Commonwealth (\$30,848).

The payment to the Commonwealth of \$2,785 represents the value of trips made by the Candidate that were not campaign-related. It should be noted that the Committee paid the amount billed.

In the opinion of the Audit staff, the \$2,785 is not an "overpayment" or "unnecessary payment", but, a payment for an expense that is not campaign-related. Therefore, an offset in this instance is not warranted.

Further, Counsel for the Committee states that the \$5,316 "should not be considered non-qualified campaign expenses." It should be noted that no additional documentation was made available for review which documented the credit card charges (\$2,532), or demonstrated that the trips (\$2,785) were campaign-related.

In summary, it is the Audit staff's opinion that no change to the amount due to the Commonwealth of Virginia (\$30,848) is warranted. Further, the expenditures totaling \$5,316 should be considered non-qualified campaign expenses and a pro-rata repayment to the United States Treasury is required.

2. Finding III.A. - Determination of Net Outstanding Campaign Obligations

It should be noted that the Committee disputes the Audit Division's "Capital Assets" figure included on the Net Outstanding Campaign Obligations (NOCO) statement. The Committee contends that,

"[t]he Committee is not aware of any precedent for characterizing post-ineligibility lease payments as capital assets for NOCO purposes. Moreover, it questions whether, for NOCO purposes, a lease buyout should be treated the same as a direct purchase of a capital asset."

The Audit staff's included three prepaid lease payments totaling \$8,513 (for lease of the equipment from January 11, 1992 thru April 11, 1992) and the payment for the buyout of the computer equipment lease (\$6,938) as the asset value of the equipment on January 8, 1992.

The Regulation at 11 CFR 9034.5(c)(1) states, in part, that the fair market value of capital assets may be considered to be the total original cost of such items when acquired less 40%, to account for depreciation, except [emphasis added] that items acquired after the date of ineligibility must be valued at their fair market value on the date acquired. If the candidate wishes to claim a higher depreciation percentage for an item, he or she must list that capital asset on the statement separately and demonstrate, through documentation, the fair market value of each such asset.

The computer equipment was acquired on January 29, 1992 (the date of the buyout), thus, in accordance with the Regulation, the computer equipment must be valued at its fair market value on that date (January 29, 1992). On January 29, 1992 the Committee made payments totaling \$12,696 to Fairfax Computer Products representing two of the three prepaid lease payments and the lease buyout. In addition, the Committee made a payment on October 25, 1991 which included a prepayment for the final lease payment of \$2,755.

In the opinion of the Audit staff, the fair market value of the computer equipment on January 8, 1992 is the total amount paid for the equipment or \$15,452 (total is off by \$1 due to rounding). Therefore, no change to the "Capital Assets" value included in the Committee's NOCO is necessary.

3. Finding III.C.2. - Apparent Non-Qualified Campaign Expenses - Questionable Salary Payments

In response to the Final Audit Report, the Committee submitted additional documentation with respect to two questionable salary payments totaling \$15,000 (\$10,000 - Ruth M. Jones, \$5,000 - William M. Keough Jr.). The Committee contends that the \$15,000 estimate for winding down accounting expenses on its NOCO statement (dated January 8, 1992), was not related to the two payments.

Further, the Committee requests that the \$5,000 payment be "reclassified as a qualified campaign expense and included in the Committee's NOCO Statement." In support of this request, the Committee submitted: (1) a previously submitted signed statement from Mr. Keough; (2) a signed statement from the Assistant Treasurer describing the services performed by Mr. Keough; (3) a Virginia State Police form identifying expenses incurred by the Committee in connection with Mr. Keough's travel; and (4) Federal Express account statements reflecting instances where Mr. Keough sent packages to campaign offices.

During fieldwork, Counsel for the Committee was questioned about a \$15,000 estimate for accounting fees included on the Committee's NOCO. Counsel indicated that the amount was

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estimated at the time the NOCO was prepared and that no individual(s) was paid to perform those functions. During the exit conference, the Audit staff informed the Committee that the \$15,000 estimate for accounting fees was not recognized as a legitimate winding down expense. Counsel responded by indicating that Ms. Jones and Mr. Keough performed those duties.

Based on our analysis of the documentation submitted for the payments to Mr. Keough and Ms. Jones, it remains the opinion of the Audit staff that the payments are non-qualified campaign expenses. The facts are: (1) the Committee has been inconsistent with its classification of the payments; (2) the Committee paid Mr. Keough and Ms. Jones on January 29, 1992 without being billed for their services; and, (3) there were no compensation agreements between the individuals and the Committee.

As a result, there is no change in the amount of the pro-rata repayment due to the United States Treasury.

4. Finding III.D. - Matching Funds Received in Excess of Entitlement

Our analysis of the NOCO statement filed by the Committee, indicated that the Candidate was in a deficit position of (<\$73,439>) on his date of ineligibility (January 8, 1992). Further, the Candidate was entitled to \$71,679 of the \$90,711 matching fund payment received on February 4, 1992. Therefore, the Candidate received \$19,032 in excess of the amount to which he was entitled. (See final audit report).

As noted above, the Committee submitted additional documentation with respect to Finding III.D. Matching Funds Received in Excess of Entitlement.

Based on our analysis, the Committee has demonstrated that an additional \$2,849 (\$457 - Federal Express, \$2,392 - Ron Lester) should be included as accounts payable for qualified campaign expenses. The revised NOCO statement indicates a deficit position of (<\$76,288>). Therefore, the Candidate was entitled to \$74,528 of the \$90,711 matching fund payment.

As a result, the Candidate's receipt of matching funds in excess of the amount to which he was entitled was reduced to \$16,183.

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5. Repayment Recap

The amount repayable to the U.S. Treasury pursuant to 26 U.S.C. §§9038(b)(1) and (2) is:

1. Apparent Non-Qualified Campaign Expenses (Finding III.C)	12,026
2. Matching Funds Received in Excess of Entitlement (Finding III.D)	<u>16,183</u>
Repayment Amount	<u>28,209</u>

A revised NOCO statement and recap of matching funds received in excess of entitlement can be found at Attachment 1. Should you hve any questions, please contact Brian Dehoff or Tom Nurthen at 219-3720.

Attachment as stated

9 5 0 7 0 1 9 2

Audit Analysis of Wilder for President Committee
NOCO Statement, as of 1/8/92

ASSETS

Cash in Bank	\$336,977	
Accounts Receivable	19,448	
Capital Assets	<u>15,452</u>	
Total Assets		\$371,877

LIABILITIES

Accounts Payable for Qualified Campaign Expenses	\$252,117	
Amount Due the Commonwealth of VA	30,848	
Winding Down Cost 1-9-92/8-12-94		
Salaries/Consulting Fee (including pre-ineligibility commitments)	60,880	
Fundraising Costs	1,257	
Legal Fees & Expenses	87,027	
Rent	4,988	
Administrative Costs (phone, supplies, furniture rental, etc.)	1,324	
Accounting Fees	640	
Amounts Due U.S. Treasury	<u>9,084</u>	
Total Liabilities		<u>448,165</u>
Deficit		<u>\$ (76,288)</u>

Matching Funds Received in Excess of Entitlement

Deficit as of 1-8-92	\$(76,288)
Private Contributions (Received 1-9-92 thru 2-4-92)	<u>1,760</u>
Remaining Entitlement as of 2-4-92	<u>\$74,528</u>
Matching Fund Payment (2-4-92)	\$90,711
Remaining Entitlement as of 2-4-92	<u>74,528</u>
Matching Funds Received in Excess of Entitlement	<u>\$16,183</u>

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ATTORNEYS AT LAW

1227 25TH STREET N.W.

WASHINGTON D.C. 20037-11561

(202) 861-0900

TELECOPIER (202) 296-2882

DIRECT LINE

250 PARK AVENUE
NEW YORK, NEW YORK 10177-00771
(212) 351-4500

1875 CENTURY PARK EAST
LOS ANGELES, CALIFORNIA 90067-2501
(310) 556-8881

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STAMFORD, CONNECTICUT 06901-27041
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ONE RIVERFRONT PLAZA
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75 STATE STREET
BOSTON, MASSACHUSETTS 02109
(617) 342-4000

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SAN FRANCISCO, CALIFORNIA 94111-5994
(415) 398-3500

12750 MERIT DRIVE
DALLAS, TEXAS 75251-12091
(214) 490-3143

116 SOUTH MONROE STREET
TALLAHASSEE, FLORIDA 32301-1530
(904) 681-0596

2400 SOUTH DIXIE HIGHWAY, SUITE 100
MIAMI, FLORIDA 33133
(305) 856-1100

510 KING STREET, SUITE 301
ALEXANDRIA, VIRGINIA 22314-31321
(703) 684-1204

LEGAL & CONFIDENTIAL

July 25, 1994

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HAND-DELIVERED

Kim L. Bright-Coleman, Esquire
Associate General Counsel
Office of the General Counsel
Federal Election Commission
999 E Street, N.W., Room 657
Washington, D.C. 20463

**RE: WILDER FOR PRESIDENT COMMITTEE: RESPONSE TO
FINAL AUDIT REPORT**

Dear Ms. Bright-Coleman:

Enclosed please find the response of Governor Wilder and the Wilder for President Committee ("the Committee") to the Final Audit Report, which was forwarded to the Governor and the Committee by the Audit Division on or about May 11, 1994.

The Committee specifically disputes the six recommendations in the Final Audit Report. As part of its response thereto, the Committee incorporates by reference its previously-submitted responses to the matters addressed by the six recommendations.

In addition, pursuant to 11 C.F.R. §9038.2(c)(3), the Governor and the Committee request an opportunity for their counsel to make an oral presentation to the Commission regarding certain matters addressed in the Final Audit Report.

ATTACHMENT 6
Page 1 of 122

Kim L. Bright-Coleman, Esquire
July 25, 1994
Page ^N

If you have any questions regarding this filing, please do not hesitate to contact me at
(202) 861-1877.

Sincerely,



Leslie J. Kerman
General Counsel
Wilder for President Committee

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WILDER FOR PRESIDENT COMMITTEE

FINAL AUDIT REPORT

RESPONSE TO RECOMMENDATIONS #1 and #2

SUBJECT: Apparent Excessive and Prohibited Contributions

For the reasons set forth in its response to the Interim Audit Report (which are incorporated by reference), the Committee continues to dispute the Commission's inclusion in the Final Audit Report of repayment demands in connection with apparent excessive and prohibited contributions.

The Committee also seeks confirmation that the Commission's policies with respect to apparent excessive and prohibited contributions (in particular, the policy to no longer recognize untimely refunds) are being applied on a consistent basis with respect to all 1992 presidential campaigns.

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WILDER FOR PRESIDENT COMMITTEE
FINAL AUDIT REPORT

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RESPONSE TO RECOMMENDATION #6

SUBJECT: Matching Funds In Excess Of Entitlement

The Committee disputes the Audit Division's characterization of the \$2,392.30 payment to Ron Lester (by Committee check dated April 15, 1992) as "non-qualified campaign expenses".

The referenced reimbursement to Mr. Lester was in connection with various expenses he incurred while performing services, and otherwise on behalf of, the Wilder presidential campaign in November and December, 1991 -- while he was serving as a paid consultant to the Committee.

In support of the Committee's position that the referenced \$2,392.30 payment constitutes a qualified campaign expense, attached is the following:

1. Statement signed by Ronald Lester;
2. Statement signed by Joseph Johnson, former Campaign Manager of the Committee;
3. Copy of a Federal Express Statement reflecting that India Adeas of the Committee forwarded a package to Mr. Lester at the Committee's expense while he was in Las Vegas, Nevada in December, 1991; and
4. Copy of documentation in connection with Committee Check Number #476 in the amount of \$4,853.43 payable to the Treasurer of Virginia. Said documentation reflects that Governor Wilder attended the National Black Caucus of State Legislators meeting in Las Vegas, Nevada in December, 1991.

Accordingly, the Committee requests that the referenced \$2,392.30 be reclassified as a qualified campaign expense and included in the Committee's NOCO Statement.

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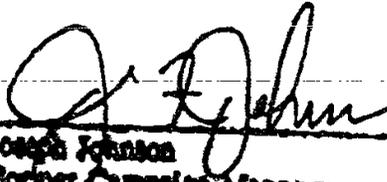
**STATEMENT OF JOSEPH JOHNSON
FORMER CAMPAIGN MANAGER OF THE
WILDER FOR PRESIDENT COMMITTEE**

This statement concerns the \$2,392.30 payment to Ron Lester by the Wilder for President Committee ("the Committee") by check dated April 15, 1992.

This \$2,392.30 served to reimburse Mr. Lester for expenses he incurred on behalf of the Committee in November and December, 1991 -- at which time he was working as a paid consultant for the Committee. I personally reviewed and approved Mr. Lester's referenced expense reimbursement request (as evidenced by my initials on Mr. Lester's January 14, 1992 Memorandum). Specifically, Mr. Lester incurred expenses on behalf of the Committee for telephone calls and a car rental on November 15-17, 1991. Moreover, he incurred expenses in connection with work performed for the Committee in December, 1991 at both the National Black Caucus of State Legislators meeting (including advance work for the Governor) and the Florida State Democratic Convention (where convention delegates participated in a presidential straw poll).

As a matter of course, I only approved reimbursement requests where the expenses in question related to, and were incurred on behalf of, the Committee and its objective of promoting the candidacy of Governor Wilder.

DATED: July 25, 1994



Joseph Johnson
Former Campaign Manager
Wilder for President Committee

...END...

...END...

SENDER ACTIVITY SUMMARY

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
390678434	SARAH CALLAHAN WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	CAROL DAVIDSON OFFICE OF GOVERNOR WILDER 340 STATE CAPITOL OF VIRGINIA RICHMOND, VA 23219 AA DELIVERED 12/03/91 13:20 SIGNED: T. RICEY	1/ NA	STANDARD LTR	11.50	11.50
85915054	1 SHIPPED 12/02/91					
390678434	INDIA AREAL WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	RONALD LESTER WILDER FOR PRESIDENT 3570 LAS VEGAS BLVD S LAS VEGAS, NV 89109 AA DELIVERED 12/03/91 09:25 SIGNED: P. WELLSIE	1/ 20	PRIORITY PAK	50.75	50.75
85915054	1 SHIPPED 12/02/91					
390678434	WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	304 PULSON CT CAPITOL HEIGHTS, MD 20743 AA DELIVERED 12/03/91 09:37 SIGNED: C. KELLAM	1/ 2	PRIORITY BOX	24.25	24.25
85915054	1 SHIPPED 12/02/91					

CONTINUED NEXT PAGE



SENDER ACTIVITY SUMMARY

BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

INVOICE NO. 4-499-09607 ACCOUNT NO. 1548-6688-5
DATE 12/06/91
PAGE 4 OF 8

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
3906784540	BERNAR STEVENSON WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	KRISTAL CONO 7423 PIEDRAS ROCKS, MD 20826 AA DELIVERED 12/03/91 15:22 SIGNED: R. BREWER	1/ NA	STANDARD LTR	11.50	11.50
85915054	1 SHIPPED 12/02/91					
SENDER SUBTOTAL			274.00	CONTINUED NEXT PAGE		



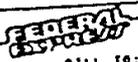
THIRD PARTY ACTIVITY SUMMARY

BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

INVOICE NO. 4-499-09607 ACCOUNT NO. 1548-6688-5
DATE 12/06/91
PAGE 5 OF 8

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
3096602121	RUTH JONES GOVERNOR'S OFFICE STATE CAPITOL RICHMOND, VA 23219	REN BROWN 840 PAYTON RD S W ATLANTA, GA 30311 AA DELIVERED 11/21/91 10:15 SIGNED: C. CLEVELAND	1/ NA	PRIORITY LTR DISCOUNT	15.50 -2.50	13.00
67147023	1 DROP OFF 11/20/91					
3096602143	RUTH JONES GOVERNOR'S OFFICE STATE CAPITOL RICHMOND, VA 23219	BERNAR STEVENSON WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD STE 404 FAIRFAX, VA 22030 AA DELIVERED 11/21/91 10:27 SIGNED: I. AREAS	1/ NA	PRIORITY LTR DISCOUNT	15.50 -2.50	13.00
67147023	1 DROP OFF 11/20/91					
3096602174	BILL KEOUGH GOVERNOR'S OFFICE STATE CAPITOL RICHMOND, VA 23219	PETER LEBLANC ADA COUNTY DEMOCRATIC PARTY 878 DRUMBACK ST BOISE, ID 83702 AA DELIVERED 11/21/91 17:31 SIGNED: P. LEBLANC	1/ NA	PRIORITY LTR DISCOUNT	15.50 -2.50	13.00
24184345	1 1ST ATTEMPT 11/21/91 10:05 00 DROP OFF 11/20/91					

CONTINUED NEXT PAGE



THIRD PARTY ACTIVITY SUMMARY

BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

INVOICE NO. 4-499-09607 ACCOUNT NO. 1548-6688-5
DATE 12/06/91
PAGE 6 OF 8

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
3096602095	BILL KEOUGH GOVERNOR'S OFFICE	CHERYL LAUSOR	1/ NA	PRIORITY LTR	15.50	15.50

ATTACHMENT

05070192

DEPARTMENT OF STATE POLICE

DECEMBER 7, 1991
(on report) 1/4/91

REVIEWED AND FORWARDED

WJW 12/1/91

TO	ROUTING SLIP	FROM
	Supernintendent	
	Deputy Superintendent	
	Chief Assistant	
	Director, Bureau of Administrative & Support Svcs	
	Director, Bureau of Criminal Investigation	
	Director, Bureau of Field Operations	
	Dep. Dir., Bureau of Administrative & Support Svcs	
	Dep. Dir., Bureau of Criminal Investigation	
	Dep. Dir., Bureau of Field Operations	
	Internal Auditors	
	Aviation Unit	
	Executive Protective Unit	
	Internal Affairs Unit	
	Director, Public Information	
	Planning and Research Unit	
	Academy	
	Communications Division	
	Data Processing Division	
	Personnel Division	
	Property and Finance Division	
	Records Management Division	
	1st Division	
	2nd Division	
	3rd Division	
	4th Division	
	5th Division	
	6th Division	
	7th Division	
	Safety Division	
	Motor Carrier Safety Unit	

Comments, Please _____
 Please Handle _____
 Please See Me _____
 Information for Reply and Return _____
 Prepare Letter for My Signature _____
 Please Note and Forward _____
 For Signature _____
 File _____

TO - RUTH JONES
 FROM - T.R. W.W. MARSH, JR
 SUBJECT - YSA CHARGE W/PC 4198-09W-008-8574
 ATTACHED INVOICE # 200165 DATED DEC. 5, 1991,
 SHOWS THE AMOUNT OF \$1,430.00, COVERING AIRLINE
 TICKETS FROM WASHINGTON, DC TO LAS VEGAS,
 NV., TO ATTEND NATIONAL BLACK COUNCIL OF
 STATE LEGISLATORS 12/6/91, AND RETURN
 FLIGHT TO RICHMOND.
 (WINGSPAN) INTERNATIONAL TRAVEL
 4401 DOMINION BLD.
 GLEN ALLEN, VA. 23160
 FIN # 540832735
 * THIS WAS CHARGED ON COY'S STATE CREDIT CARD

\$ 1,430.00

65179122

PASSENGER TICKET AND BAGGAGE CHECK
SUBJECT TO CONDITIONS OF CONTRACT
NOT TRANSFERABLE

1967 02 1271 200155

0930

PASSENGER RECEIPT

ARC

DELTA AIR LINES
CROYINGTON TRAVEL

RICHMOND

A49614261

WILDER/DOUGGOVERNOR

VAUS 5DEC93

DCADRDA1115 F 6DE

WILDER/DOUGGOVERNOR IFCINC/UA HULTI

18 01627

XORDLASAA 167 F 6DE

NOT VALID FOR
TRANSPORTATION

THIS IS YOUR RECEIPT

DINAL

LASATL DL 650FN 6DE

XATLRICDL 806FN 7DE

FP BA4798090000088574 EXP0193/ 76259 FC 6DEC DCA
AA X/ORD F28 AA LAS 630.00F28 DL X/ATL FN DL RIC
670.00FN \$1300.00 END

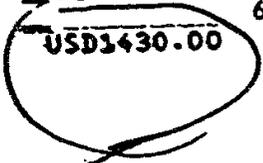
USD1300.00
US130.00

66949519674

0 006 1459530765 3

NOT VALID FOR TR
0 006 1459530765 3

USD1430.00



ATTACHMENT

Page 8 of 12

COVINGTON

INTERNATIONAL TRAVEL

ACCT NO	DATE	PAGE	INVOICE
1271	DEC 05 1991	01	100000

PLEASE REMIT TO: 4401 DOMINION BLVD. GLEN ALLEN VA 23060

AGENT: DINAL BRANCH 02
DISTRIBUTED TO

SOLD TO

WILDER/DOUGGOVERNOR

OFFICE OF THE GOVERNOR
CAPITOL BUILDING
3RD FLOOR
RICHMOND VA 23219

5 DEC 91 - FRIDAY
LVI WASH/NATIONAL 1000A AMERICAN
ARI CHICAGO/OHARE 1102A NONSTOP
SNACK
SEAT 5E - BOARDING PASS ISSUED AT CHECK IN
FLT: 1115 FIRST CLASS CONFIRMED

LVI CHICAGO/OHARE 1155A AMERICAN
ARI LAS VEGAS 151P NONSTOP
LUNCH
SEAT 3E - BOARDING PASS ISSUED AT CHECK IN
FLT: 167 FIRST CLASS CONFIRMED

LVI LAS VEGAS 1050P DELTA
ARI ATLANTA 525A NONSTOP
SNACK
SEAT 2D - BOARDING PASS ISSUED AT CHECK IN
FLT: 850 FIRST CLASS CONFIRMED

1 DEC 91 - SATURDAY
LVI ATLANTA 630A DELTA
ARI RICHMOND 844A ONE STOP
SNACK
SEAT 2D - BOARDING PASS ISSUED AT CHECK IN
FLT: 806 FIRST CLASS CONFIRMED

TICKET NUMBER/S:
WILDER/DOUGGOVERNOR

1459530765

BA CARD

1430.00

AIR TRANSPORTATION	1300.00	TAX	130.00	TLL	1430.00
		SUB TOTAL			1430.00
		CREDIT CARD PAYMENT			1430.00-
		AMOUNT DUE			.00

DELIVER TICKET IN WINDOW ENVELOPE ATTN: CAROL DAVIDSON//5DEC

ORIGINAL ITINERARY

NET DUE AND PAYABLE UPON RECEIPT. PLEASE RETURN REMITTANCE COPY WITH PAYMENT. TEL 804-747-7077 • FAX 804-273-0006

ATTACHMENT 6

Page 9 of 122

RECEIVED
FEDERAL ELECTION
COMMISSION
JUL 20 10 07 AM '92

WILDER FOR PRESIDENT COMMITTEE
FINAL AUDIT REPORT

RESPONSE TO RECOMMENDATIONS #5 & #6

SUBJECT: Apparent Non-Qualified Campaign Expenses

The Committee objects to the Audit Division's classification of the \$5,000 payment to William Keough by Committee check dated January 19, 1992 as a non-qualified campaign expense.

First, the Committee strongly disputes the Audit Division's assertion that the Committee classified the payment to Mr. Keough as "accounting services" necessary to wind-down the campaign, and that the Committee currently is attempting to recharacterize the payment (See Final Audit Report at page 34, first paragraph of text and footnote 12). The Committee never stated or indicated in any manner that the \$15,000 estimated for wind-down accounting expenses on its January 8, 1992 NOCO Statement corresponded to, or was in any way related to, the referenced \$5,000 payment of January 29, 1992 to Mr. Keough. Thus, any conclusions based on this premise are incorrect.

Second, the Committee objects to the characterization of its disbursement to Mr. Keough as a "questionable" payment.

MR. KEOUGH PERFORMED WORK FOR THE COMMITTEE. Mr. Keough performed a variety of services for the Committee from approximately April, 1991 through the end of 1993, as detailed in his previously submitted statement of August 11, 1993 (copy attached for your convenience). Mr. Keough's statement regarding the scope of work he performed are corroborated by the following documents (attached hereto): (1) a Statement from Nicholas Perrins, Assistant Treasurer of the Committee; (2) a Virginia State Police form which concerns expenses incurred by the Committee in connection with Mr. Keough's campaign-related travel with the Governor; and (3) copies of the Committee's Federal Express account statements, reflecting 38 campaign-related packages sent by Mr. Keough from various locations to individuals and offices throughout the country. (This only includes packages billed to the Committee's Federal Express account and not packages for which the Commonwealth of Virginia received reimbursement.)

MR. KEOUGH'S COMPENSATION WAS REASONABLE. Mr. Keough was paid a total of \$5,000 by the Committee for services performed from the Committee's inception from approximately April 1, 1991 through the end of January, 1992. It is the Committee's position that such compensation was entirely reasonable in light of the services it received from Mr. Keough.

Accordingly, the Committee requests that the referenced \$5,000 payment be reclassified as a qualified campaign expense and included in the Committee's NOCO Statement.

05070199

MEMORANDUM

TO: Leslie J. Kerman
FROM: William Keough
DATE: August 11, 1993
RE: Wilder for President Committee

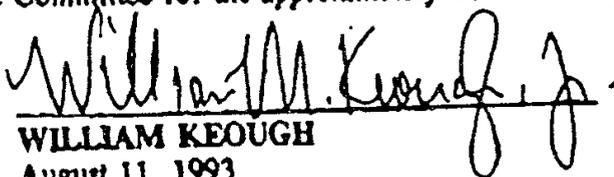
Per your request, the following outlines the services I performed for the Wilder for President Committee ("the Committee") and my compensation from the Committee in connection with these services.

- 0507019200
1. I have performed various services for the Committee from approximately April 1, 1991 through the present, including reviewing vendor invoices, the preparation of checks for Ruth Jones' review and signature, maintaining certain financial records of the Committee and assisting with the preparation of FEC reports. Moreover, I have worked with the Committee on various other activities, including travelling with Governor Wilder to New Hampshire in December, 1991 (I took personal leave from my State job for this trip), and preparing filings to qualify for inclusion on State ballots.

Subsequent to Governor Wilder's termination of his candidacy in January, 1992, I have spent numerous hours working on winding-down the campaign, including assisting in obtaining information and documentation in connection with the FEC audit.

2. I agreed to accept \$5,000 from the Committee as compensation for services I performed through the end of January, 1992. Accordingly, I received a check for \$5,000 from the Committee on or about January 29, 1992. I have not charged the Committee any fees for the many hours spent by me on campaign-related matters from February 1, 1992 through the present (approximately 18½ months), nor have I been compensated for such services by the Committee.
3. I did not receive any severance payment(s) from the Committee. The consulting fees I received were based on actual work I performed for the Committee.
4. To the extent my services to the Committee have exceeded the fees I was paid by the Committee, I hereby convert the remainder of my services to volunteer services on behalf of the Committee (in particular, the close-down related services I have performed for the Committee for the approximately 18½ month period since February 1, 1992).

By:


WILLIAM KEOUGH

Dated:

August 11, 1993

**STATEMENT OF NICHOLAS PERRINS
ASSISTANT TREASURER OF THE
WILDER FOR PRESIDENT COMMITTEE**

This is to confirm that William Keough performed a variety of services for the Wilder for President Committee ("the Committee") from approximately August 15, 1991¹ through, at minimum, the latter portion of 1993, including reviewing vendor invoices, preparation of checks for Ruth Jones' review and signature, maintaining certain financial records of the Committee, assisting in the preparation of FEC reports, and assisting in compiling information and documentation in connection with the FEC audit.

I personally participated in numerous telephone conversations with Mr. Keough relating to his performance of the above-described services, and have personal knowledge that he performed said services.

DATED: July 25, 1994



Nicholas Perrins
Assistant Treasurer
Wilder for President Committee

¹I had no involvement with the Wilder for President campaign prior to approximately August 15, 1991, and thus cannot confirm Mr. Keough's campaign-related activity prior to that date.

950701997

SELECT FEDERAL EXPRESS STATEMENTS
(transactions involving Mr. Keough are highlighted)

95070192



REMITTANCE ADVICE

PAYMENT DUE IN 15 DAYS

1529-5072-1 4-446-99112 10/11/91
ACCOUNT NUMBER INVOICE NUMBER DATE

ADDRESS CORRECTIONS?
CALL: 800-822-1147
7AM - 6PM CST

114.25
AMOUNT DUE

7
AIRBILLS

1529507244489911296001142564

DO NOT STAPLE OR PAPER CLIP

TO INSURE PROPER CREDIT, PLEASE RETURN
THIS DOCUMENT WITH YOUR REMITTANCE

10051..... 5-DIGIT 22313
WILDER FOR PRESIDENT
MELISSA BLACK 32
PO BOX 25033
ALEXANDRIA, VA 22313-5033

MAIL PAYMENT TO:
FEDERAL EXPRESS CORP
PO BOX 1140 DEPT A
MEMPHIS, TN 38101-1140



SENDER ACTIVITY SUMMARY

PAGE 1 OF 4
DATE 10/11/91

BILL TO: WILDER FOR PRESIDENT
201 N UNION ST STE 300
ALEXANDRIA, VA 22314

INVOICE NO. 4-446-99112 ACCOUNT NO. 1529-5072-1

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
4728970920	SARAH CALLAHAN WILDER FOR PRESIDENT 201 N UNION ST STE 300 ALEXANDRIA, VA 22314	FRANCIS/PRSS OFFICE OFFICE OF GOVERNOR WILDER 3RD BROAD ST-STA CAPITOL RICHMOND, VA 23219 AA DELIVERED 10/01/91 14:12 SIGNED: J.KARNEY	1/ NA	PRIORITY LTR DISCOUNT	15.50 -2.50	13.00
75723336	1 DROP OFF 09/30/91					
4728970931	SARAH CALLAHAN WILDER FOR PRESIDENT 201 N UNION ST STE 300 ALEXANDRIA, VA 22314	MS CAROL DAVIDSON THE OFFICE OF GOVERNOR WILDER BROAD ST / STATE CAPITOL RICHMOND, VA 23213 AA DELIVERED 10/02/91 10:07 SIGNED: T.WICKET	1/ 2	STANDARD PAK DISCOUNT ADDRESS CORR	14.50 -2.50 5.00	19.00
75760136	1 DROP OFF 10/01/91					
4728970942	SARAH CALLAHAN WILDER FOR PRESIDENT 201 N UNION ST STE 300 ALEXANDRIA, VA 22314	CAROL DAVIDSON OFFICE OF THE GOVERNOR 3RD / STATE HOUSE OF VIRGINIA/BROAD RICHMOND, VA 23219 AA DELIVERED 10/03/91 15:34 SIGNED: R.GOLEGREN	1/ 3	STANDARD PAK DISCOUNT	17.50 -2.50	15.00
75759526	1 DROP OFF 10/02/91					

CONTINUED NEXT PAGE



SENDER ACTIVITY SUMMARY

PAGE 2 OF 4
DATE 10/11/91

BILL TO: WILDER FOR PRESIDENT
201 N UNION ST STE 300
ALEXANDRIA, VA 22314

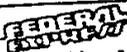
INVOICE NO. 4-446-99112 ACCOUNT NO. 1529-5072-1

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
4728971185	BILL KEUGH WILDER FOR PRESIDENT 201 N UNION ST STE 300 ALEXANDRIA, VA 22314	JOHN GRAZZELL WILDER FOR PRES 201 N UNION ST STE 300 ALEXANDRIA, VA 22314 AA DELIVERED 10/03/91 08:57 SIGNED: T.MCCABLE	1/ NA	PRIORITY LTR	15.50	15.50
44198000	1 SHIPPED 10/02/91					
4728971133	SARAH CALLAHAN WILDER FOR PRESIDENT 201 N UNION ST STE 300 ALEXANDRIA, VA 22314	RUSSELL VERNEY NEW HAMPSHIRE DEMOCRATIC PART 150 NORTH MAIN ST CONCORD, NH 03301 AA DELIVERED 10/04/91 11:13 SIGNED: R.SMARINE	1/ NA	STANDARD LTR DISCOUNT	11.50 -2.50	9.00
75753693	1 DROP OFF 10/03/91					
4728971163	WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	MR ALBERT J DWOSKIN AJ DWOSKIN & ASSOC 3050 CHAIN BRIDGE RD STE 200 FAIRFAX, VA 22030 AA DELIVERED 10/07/91 10:26 SIGNED: B.SMITH	1/ 6	PRIORITY PAK	29.75	29.75
44198033	1 SHIPPED 10/04/91					

CONTINUED NEXT PAGE

ATTACHMENT

Page 15 of 122



SENDER ACTIVITY SUMMARY

PAGE 3 OF 4
DATE 10/11/91

BILL TO: WILDER FOR PRESIDENT
201 N UNION ST STE 300
ALEXANDRIA, VA 22314

INVOICE NO. 4-446-99112 ACCOUNT NO. 1529-5072-1

95070122



REMITTANCE ADVICE

PAYMENT DUE IN 15 DAYS

1529-5072-1 4-453-49204 10/18/91
ACCOUNT NUMBER INVOICE NUMBER DATE

ADDRESS CORRECTIONS?
CALL: 800-422-1147
7AM - 4PM EST

115.00
AMOUNT DUE

4
AIRBILLS

1529507244534920450001150044

DO NOT STAPLE OR PAPER CLIP

TO INSURE PROPER CREDIT, PLEASE RETURN
THIS DOCUMENT WITH YOUR REMITTANCE

10050***** 5-0162T 22313
WILDER FOR PRESIDENT
MELISSA BLACK 82
PO BOX 25833
ALEXANDRIA, VA 22313-5033

MAIL PAYMENT TO:
FEDERAL EXPRESS CORP
PO BOX 1140 DEPT A
MEMPHIS, TN 38109-1140



BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

SENDER ACTIVITY SUMMARY

PAGE 1 OF 2
DATE 10/18/91
INVOICE NO. 4-453-49204 ACCOUNT NO. 1529-5072-1

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
0728971196	WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	JOHN BRAZZELL WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD STE 404 FAIRFAX, VA 22030 AA DELIVERED 10/09/91 10:23 SIGNED: S.CALLAHAN	1/ NA	PRIORITY LTR	15.50	
44196044	1 SHIPPED 10/08/91					15.50
0728970964	SARAH CALLAHAN WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	CAROL DAVIDSON 3RD THE OFFICE OF GOVERNOR WILDER BROAD ST/STATE CAPITOL OF VIR RICHMOND, VA 23219 AA DELIVERED 10/10/91 10:14 SIGNED: T.WICKET	1/ 1	STANDARD PAK	15.50	
96767414	1 SHIPPED 10/09/91					15.50
0728970975	SARAH CALLAHAN WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	CAROL DAVIDSON/ROD TYLER THE OFFICE OF GOVERNOR WILDER STATE CAPITOL OF VIRGINIA RICHMOND, VA 23219 AA DELIVERED 10/11/91 08:53 SIGNED: J.BROOBY	1/ NA	PRIORITY LTR	15.50	
96766742	1 SHIPPED 10/10/91					15.50
CONTINUED NEXT PAGE						



BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

SENDER ACTIVITY SUMMARY

PAGE 2 OF 2
DATE 10/18/91
INVOICE NO. 4-453-49204 ACCOUNT NO. 1529-5072-1

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
0728971222	WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	JOHN BRAZZELL WILDER FOR PRESIDENT COMMITTEE 3050 CHAIN BRIDGE RD STE 404 FAIRFAX, VA 22030 AA DELIVERED 10/11/91 09:51 SIGNED: I.DICKENS	1/ 1	PRIORITY PAK	22.50	
74027435	1 SHIPPED 10/10/91					22.50
3452349050	SARAH CALLAHAN WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	CAROL DAVIDSON OFFICE OF THE GOVERNOR 3RD STATE CAPITOL OF VIRGINIA RICHMOND, VA 23219 AA DELIVERED 10/12/91 11:22 SIGNED: T.WICKET	1/ 3	PRIORITY PAK DISCOUNT SAT SERVICE	27.00 -2.50 10.00	
96764235	1 DROP OFF 10/11/91					34.50
0728970986	SARAH CALLAHAN WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	CAROL DAVIDSON OFFICE OF THE GOVERNOR 3 STATE CAPITOL OF VIRGINIA RICHMOND, VA 23219 AA DELIVERED 10/15/91 11:54 SIGNED: H.GEOGHEGAN	1/ NA	STANDARD LTR	11.50	
96772152	1 SHIPPED 10/14/91					11.50
SENDER SUBTOTAL			115.00	PAY THIS AMOUNT		115.00

RECIPIENT SUBTOTAL 24.25 PAY THIS AMOUNT 24.25



HERITANCE ADVICE

PAYMENT DUE IN 15 DAYS

1529-5072-1 4-440-31495 10/25/91
 ACCOUNT NUMBER INVOICE NUMBER DATE

ADDRESS CORRECTIONS?
 CALL: 800-622-1147
 7AM - 6PM CST

121.25 4
 AMOUNT DUE AIRBILLS

1529507244603149501001212519

DO NOT STAPLE OR PAPER CLIP

TO INSURE PROPER CREDIT, PLEASE RETURN
 THIS DOCUMENT WITH YOUR HERITANCE

10049***** 5-DIGIT 22313
 WILDER FOR PRESIDENT
 MELISSA BLACK SZ
 PO BOX 25033
 ALEXANDRIA, VA 22313-5033

MAIL PAYMENT TO:
 FEDERAL EXPRESS CORP
 PO BOX 1140 DEPT A
 MEMPHIS, TN 38101-1140



SENDER ACTIVITY SUMMARY

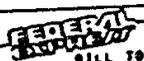
PAGE 1 OF 4
 DATE 10/25/91

BILL TO: WILDER FOR PRESIDENT
 3050 CHAIN BRIDGE RD
 FAIRFAX, VA 22030

INVOICE NO. 4-440-31495 ACCOUNT NO. 1529-5072-1

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
0728970990	SARAH CALLAHAN WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	CAROL DAVIDSON OFFICE OF GOVERNOR WILDER 3 STATE CAPITOL OF VIRGINIA RICHMOND, VA 23219 AA DELIVERED 10/16/91 13:19 SIGNED: M. GAEHNER	1/ MA	STANDARD LTR	11.50	
96767071	1 SHIPPED 10/15/91					11.50
0728971200	JOHN BRAZILL WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	DR RICHARD CAMPITTA 7405 HUMMINGBIRD HILL SAN ANTONIO, TX 78255 AA DELIVERED 10/16/91 06:50 SIGNED: R. CAMPITTA	1/ B	PRIORITY PAK	40.75	
44198011	1 SHIPPED 10/15/91					40.75
0728971211	B KEDUGH WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	JOHN BRAZILL WILDER FOR PRESIDENT STE 404 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030 AA DELIVERED 10/16/91 10:30 SIGNED: J. ADLIS	1/ MA	STANDARD LTR	11.50	
44198011	1 SHIPPED 10/15/91					11.50

CONTINUED NEXT PAGE



SENDER ACTIVITY SUMMARY

PAGE 2 OF 4
 DATE 10/25/91

BILL TO: WILDER FOR PRESIDENT
 3050 CHAIN BRIDGE RD
 FAIRFAX, VA 22030

INVOICE NO. 4-440-31495 ACCOUNT NO. 1529-5072-1

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES	
0728971001	NICHOLAS PERRINS WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	BENETRUS HARRIS GRASSROOTS SYSTEMS INC 3920 FAIRBANKS AVE DAYTON, OH 45407 AA DELIVERED 10/17/91 09:45 SIGNED: P. HARRIS	1/ MA	PRIORITY LTR	15.50		
96768534	1 SHIPPED 10/16/91					15.50	
3052348073	JOE JOHNSON WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	MR ROBERT BRITTON 102 WOODMONT BLVD NASHVILLE, TN 37205 AA DELIVERED 10/21/91 10:22 SIGNED: D. WESNIEWSKI	1/ MA	PRIORITY LTR SAT SERVICE	15.50 10.00		
07291223	1 SHIPPED 10/19/91 1ST ATTEMPT 10/19/91 10:00 04					25.50	
3052348042	SARAH CALLAHAN WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	CAROL DAVIDSON OFFICE OF GOVERNOR WILDER 3 STATE CAPITOL OF VIRGINIA RICHMOND, VA 23219 AA DELIVERED 10/22/91 13:48 SIGNED: T. WICKET	1/ 2	STANDARD PAK	16.50		
96772104	1 SHIPPED 10/21/91					16.50	
SENDER SUBTOTAL					121.25	PAY THIS AMOUNT	121.25

ATTACHMENT 6
 Page 17 of 122



ACTIVITY SUMMARY

PAGE 3 OF 4
 DATE 10/25/91

BILL TO: WILDER FOR PRESIDENT
 3050 CHAIN BRIDGE RD
 FAIRFAX, VA 22030

INVOICE NO. 4-440-31495 ACCOUNT NO. 1529-5072-1



REMITTANCE ADVICE

PAYMENT DUE IN 15 DAY

1529-5072-1 4-480-25325 11/15/91
 ACCOUNT NUMBER INVOICE NUMBER DATE

ADDRESS CORRECTIONS:
 CALL: 800-622-1147
 FAX - 6PM EST

274.50 17
 AMOUNT DUE AIRBILLS

1529507244802532533002745067

NO HOT STAPLE OR PAPER CLIP

TO INSURE PROPER CREDIT, PLEASE RETURN THIS DOCUMENT WITH YOUR REMITTANCE

10050***** 5-DIGIT 22313
 WILDER FOR PRESIDENT
 MELISSA BLACK 52
 PO BOX 25033
 ALEXANDRIA, VA 22313-5033

MAIL PAYMENT TO:
 FEDERAL EXPRESS CORP
 PO BOX 1140 DEPT A
 MEMPHIS, TN 38101-1140



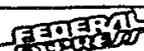
BILL TO: WILDER FOR PRESIDENT
 3050 CHAIN BRIDGE RD
 FAIRFAX, VA 22030

SENDER ACTIVITY SUMMARY

PAGE 1 OF 9
 DATE 11/15/91
 INVOICE NO. 4-480-25325 ACCOUNT NO. 1529-5072-1

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
2988409405	MARK WARNER WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	ALESIA BELL 3921 HAZANS LANE GREENSBORO, NC 27409 AA	1/ NA	STANDARD LTR DISCOUNT ADDRESS CORR	19.50 -2.50 5.00	
58363484	1ST ATTEMPT 10/24/91 11:32 03 DROP OFF 10/23/91	DELIVERED 10/25/91 15:30 SIGNED: R.BROADBENT				14.00
3506614285	RUTH M JONES WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	MADE REILLY C/O CONGRESSMAN MORAN OFC 1523 LONG-WORTH BLVD WASHINGTON, DC 20570 AA	1/ NA	PRIORITY LTR DISCOUNT	15.50 -2.50	
87147594	1 DROP OFF 11/05/91	DELIVERED 11/06/91 09:12 SIGNED: MILLER				13.00
3096402003	RUTH JONES WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	LESLIE J KERNAN CSTEIN BECKER & GREEN P C 1227 25TH ST N W WASHINGTON, DC 20037 AA	1/ NA	PRIORITY LTR	15.50	
87143485	1 SKIPPED 11/06/91	DELIVERED 11/07/91 09:46 SIGNED: M.TAMPLIN				15.50

CONTINUED NEXT PAGE



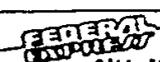
BILL TO: WILDER FOR PRESIDENT
 3050 CHAIN BRIDGE RD
 FAIRFAX, VA 22030

SENDER ACTIVITY SUMMARY

PAGE 2 OF 9
 DATE 11/15/91
 INVOICE NO. 4-480-25325 ACCOUNT NO. 1529-5072-1

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
3096402235	BILL KEOUGH WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	JOHN BRAZZELL WILDER FOR PRESIDENT ST 404 3050 CHAIN BRIDGE RD STE 404 FAIRFAX, VA 22030 AA	1/ NA	PRIORITY LTR	15.50	
87143485	1 SKIPPED 11/06/91	DELIVERED 11/07/91 09:54 SIGNED: J.BRAZZELL				15.50
3621519311	JOHN BRAZZELL WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	RR ROOM SMITH CSX CORP 701 E CAREY ST ONE JAMES CTR RICHMOND, VA 23219 AA	1/ 2	STANDARD PAK	16.50	
1529-5072-1	1 SKIPPED 11/06/91	DELIVERED 11/07/91 12:04 SIGNED: J.JENKINS				16.50
3621519322	ANTONIE SMITH WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	AYESHA M NUGUES 4400 SHADWICK DR APT 280 SACRAMENTO, CA 95842 AA	1/ NA	PRIORITY LTR	15.50	
1529-5072-1	1 SKIPPED 11/06/91	DELIVERED 11/07/91 09:34 SIGNED: A.NUGUES				15.50

CONTINUED NEXT PAGE



BILL TO: WILDER FOR PRESIDENT

ATTACHMENT 6
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FEDERAL
EXPRESSBILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

SENDER ACTIVITY SUMMARY

PAGE 3 OF 12
DATE 11/22/91
INVOICE NO. 4-487-68148 ACCOUNT NO. 1529-5072-1

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
3094602213 87147261 1	AUTH JONES WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030 880P OFF 11/13/91	INDIA ADEAS WILDER FOR PRESIDENT STE 404 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030 AA DELIVERED 11/14/91 10:19 SIGNED: A. SMITH	1/ NA	PRIORITY LTR DISCOUNT	15.50 -2.50	13.00
3094608724 85920942 1	ANTOINE SMITH WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030 SHIPPED 11/13/91	HERRMAN STEVENSON 1703 ROSEVELT ST LANTON, VA 22091 AA DELIVERED 11/14/91 08:26 SIGNED: R. STEVENSON	1/ 3	PRIORITY BOX ACCT # CORR	32.50 3.00	37.50
3094608733 85920942 1	JOHN DRAZZELL WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030 1ST ATTEMPT 11/14/91 09:07 83 SHIPPED 11/13/91	CLARETTA RODGEE 1125 SOUTH LOUISIANA CHICAGO, IL 60643 AA DELIVERED 11/14/91 09:22 SIGNED: H. DODDLET	1/ 2	PRIORITY PAK ADDRESS CORR	24.25 5.00	29.25

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FEDERAL
EXPRESSBILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

SENDER ACTIVITY SUMMARY

PAGE 4 OF 12
DATE 11/22/91
INVOICE NO. 4-487-68148 ACCOUNT NO. 1529-5072-1

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
3094602188 87144982 1	RUTH JONES WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030 SHIPPED 11/14/91	WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD STE 404 FAIRFAX, VA 22030 AA DELIVERED 11/15/91 10:18 SIGNED: A. SMITH	1/ NA	PRIORITY LTR	15.50	15.50
3094602191 87144982 1	BILL KEOWEN WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030 SHIPPED 11/14/91	NAME KELLY WILDER FOR PRESIDENT 120 N MAIN ST CONCORD, NH 03301 AA DELIVERED 11/15/91 09:26 SIGNED: M. HARKIN	1/ 1	PRIORITY PAK	22.50	22.50
3094608713 85920645 1	JOHN DRAZZELL WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030 1ST ATTEMPT 11/15/91 09:51 88 SHIPPED 11/14/91	MR BEN BROWN WILDER FOR PRESIDENT 196 NAPOLEON DR SW ATLANTA, GA 30314 AA DELIVERED 11/15/91 20:06 SIGNED: B. BROWN	1/ NA	PRIORITY LTR	15.50	15.50

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FEDERAL
EXPRESSBILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

SENDER ACTIVITY SUMMARY

PAGE 5 OF 12
DATE 11/22/91
INVOICE NO. 4-487-68148 ACCOUNT NO. 1529-5072-1

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
3621519624 85920892 1	ANTOINE SMITH WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030 SHIPPED 11/14/91	NAME KELLY 120 N MAIN ST CONCORD, NH 03301 AA DELIVERED 11/15/91 09:26 SIGNED: M. HARKIN	1/ 3	PRIORITY PAK	27.00	27.00
3621519635 85920645 1	JOHN DRAZZELL WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030 SHIPPED 11/14/91	MARTHA BOWNEY THE PALMER HOUSE 17 EAST MONROE STREET CHICAGO, IL 60603 AA DELIVERED 11/15/91 09:26 SIGNED: J. LAGUNAS	1/ NA	PRIORITY LTR	15.50	15.50
3621519646 85920645 1	INDIA ADEAS WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030 1ST ATTEMPT 11/15/91 10:28 24 SHIPPED 11/14/91	RUTH JONES GOVERNOR WILDER OFFICE STATE CAPITAL OF VIRGINIA RICHMOND, VA 23219 AA DELIVERED 11/15/91 10:36 SIGNED: J. CANARDY	1/ 1	PRIORITY BOX	47.50	47.50

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FEDERAL
EXPRESSBILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

SENDER ACTIVITY SUMMARY

PAGE 6 OF 12
DATE 11/22/91
INVOICE NO. 4-487-68148 ACCOUNT NO. 1529-5072-1

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
3621519602	ANTOINE SMITH WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD	FRED HUMPHRIES 3616 FLEETWOOD RD	1/ 6	STANDARD BOX	21.25	21.25

ATTACHMENT 6

SENDER ACTIVITY SUMMARY

PAGE 3 OF 8
DATE 12/04/91
INVOICE NO. 6-499-09607 ACCOUNT NO. 1568-6686-5

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
3906784534	SARAH CALLAHAN WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	CAROL DAVIDSON OFFICE OF GOVERNOR WILDER 3RD STATE CAPITOL OF VIRGINIA RICHMOND, VA 23219 AA DELIVERED 12/03/91 13:28 SIGNED: T. WICKET	1/ NA	STANDARD LTR	11.50	
85915056	1 SHIPPED 12/02/91					11.50
3906784543	INDIA IDEAL WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	RONALD LESTER WILDER FOR PRESIDENT 3570 LAS VEGAS BLVD S LAS VEGAS, NV 89109 AA DELIVERED 12/03/91 09:23 SIGNED: P. PUGLIESE	1/ 20	PRIORITY PAK	56.75	
85915056	1 SHIPPED 12/02/91					56.75
3906784556	ANTOINETTE SMITH WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	CHARLES KELLAN 304 POSSUM CT CAPITOL HEIGHTS, NO 22743 AA DELIVERED 12/03/91 09:37 SIGNED: C. KELLAN	1/ 2	PRIORITY BOX	24.25	
85915056	1 SHIPPED 12/02/91					24.25

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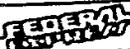


SENDER ACTIVITY SUMMARY

PAGE 4 OF 8
DATE 12/06/91
INVOICE NO. 6-499-09607 ACCOUNT NO. 1568-6686-5

BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
3906784560	HERMAN STEVENSON WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	KRISTAL COMB 7423 PIEDRAS WOODS, NO 88740 AA DELIVERED 12/03/91 15:22 SIGNED: B. BREWER	1/ NA	STANDARD LTR	11.50	
85915056	1 SHIPPED 12/02/91					11.50
SENDER SUBTOTAL			274.00	CONTINUED NEXT PAGE		



THIRD PARTY ACTIVITY SUMMARY

PAGE 5 OF 8
DATE 12/06/91
INVOICE NO. 6-499-09607 ACCOUNT NO. 1568-6686-5

BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
3096602121	RUTH JONES GOVERNOR'S OFFICE STATE CAPITOL RICHMOND, VA 23219	DEW BROWN 840 PATTON RD S W ATLANTA, GA 30311 AA DELIVERED 11/21/91 10:15 SIGNED: C. CLEVELAND	1/ NA	PRIORITY LTR DISCOUNT	15.50 -2.50	
87147023	1 DROP OFF 11/20/91					13.00
3096602143	RUTH JONES GOVERNOR'S OFFICE STATE CAPITOL RICHMOND, VA 23219	HERMAN STEVENSON WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD STE 404 FAIRFAX, VA 22030 AA DELIVERED 11/21/91 10:27 SIGNED: I. IDEAL	1/ NA	PRIORITY LTR DISCOUNT	15.50 -2.50	
87147023	1 DROP OFF 11/20/91					13.00
3096602176	BILL KEOUGH GOVERNOR'S OFFICE STATE CAPITOL RICHMOND, VA 23219	PETER LEBLANC ADA COUNTY DEMOCRATIC PARTY 818 DRUMACK ST MOISE, LO 83702 AA DELIVERED 11/21/91 17:31 SIGNED: P. LEBLANC	1/ NA	PRIORITY LTR DISCOUNT	15.50 -2.50	
24184363	1 DROP OFF 11/20/91					13.00

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THIRD PARTY ACTIVITY SUMMARY

PAGE 6 OF 8
DATE 12/06/91
INVOICE NO. 6-499-09607 ACCOUNT NO. 1568-6686-5

BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
3096602095	BILL KEOUGH GOVERNOR'S OFFICE	CHEVEL LAYSON	1/ NA	PRIORITY LTR	15.50	

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3094402174	BILL KEOSOR GOVERNOR'S OFFICE STATE CAPITOL RICHMOND, VA 23219 1ST ATTEMPT 11/21/91 10:05 00 DROPPED 077 11/20/91	PETER LEDLARC ADA COUNTY DEMOCRATIC PARTY 810 DRUMBACK ST ORISSA, IN 43702 AA DELIVERED 11/21/91 17:31 SIGNED: P.LEDLARC	1/ NA	PRIORITY LTR DISCOUNT	15.50 -2.50	13.00
						CONTINUED NEXT PAGE

FEDERAL EXPRESS

BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

THIRD PARTY ACTIVITY SUMMARY

PAGE 6 OF 8
DATE 12/06/91
INVOICE NO. 4-499-09607 ACCOUNT NO. 1548-4484-5

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
3094402093	BILL KEOSOR GOVERNOR'S OFFICE STATE CAPITOL RICHMOND, VA 23219 11/22/91	CHERYL LAWSON 1710 N ST NW 3 WASHINGTON, DC 20009 AA DELIVERED 11/22/91 10:01 SIGNED: S.LAWSON	1/ NA	PRIORITY LTR SAT SERVICE	15.50 10.00	25.50
3094402145	WILLIAM BROWNING GOVERNOR'S OFFICE STATE CAPITOL RICHMOND, VA 23219 11/22/91	NATHAN BOND WILDER FOR PRESIDENT 120 N MAIN ST CONCORD, NH 03301 AA DELIVERED 11/23/91 11:00 SIGNED: N.BOND	1/ 2	PRIORITY PAC SAT SERVICE	24.25 10.00	34.25
THIRD PARTY SUBTOTAL			98.75	PAY THIS AMOUNT	372.75	

FEDERAL EXPRESS

BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

ACTIVITY SUMMARY

PAGE 7 OF 8
DATE 12/06/91
INVOICE NO. 4-499-09607 ACCOUNT NO. 1548-4484-5

FEDER HAS ADJUSTED THIS AIRBILL FOR CORRECT PIECES, WEIGHT, AND SERVICE. ANY CHARGES MADE ARE REFLECTED IN THE INVOICE AMOUNT.

FEDERAL EXPRESS

BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

ACTIVITY SUMMARY

PAGE 8 OF 8
DATE 12/06/91
INVOICE NO. 4-499-09607 ACCOUNT NO. 1548-4484-5

FEDERAL EXPRESS PACKAGE DELIVERY STATUS CODES:

04 SHIPMENT DELIVERED TO ADDRESS OTHER THAN RECIPIENT'S

06 RECIPIENT NOT IN/BUSINESS CLOSED

FEDERAL EXPRESS

REMITTANCE ADVICE

PAYMENT DUE 11/12/91



BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

SENDER ACTIVITY SUMMARY

PAGE 3 OF 8
DATE 12/14/91
INVOICE NO. 6-505-40177 ACCOUNT NO. 1540-6486-5

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
3171108354	INDIA WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	MARC ALLEN CHICAGO URBAN LEAGUE 4510 S MICHIGAN AVE CHICAGO, IL 60653 AA DELIVERED 12/10/91 14:18 SIGNED: L.JONES	1/ NA	STANDARD LTR	11.50	
85903002	1 SHIPPED 12/09/91					11.50
SENDER SUBTOTAL					119.25	CONTINUED NEXT PAGE



BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

RECIPIENT ACTIVITY SUMMARY

PAGE 4 OF 8
DATE 12/14/91
INVOICE NO. 6-505-40177 ACCOUNT NO. 1540-6486-5

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
3094482110	WILL KEOUGH GOVERNOR'S OFFICE STATE CAPITOL RICHMOND, VA 23219	NICHOLAS PEARLINS WILDER FOR PRESIDENT STE 404 3050 CHAIN BRIDGE ROAD FAIRFAX, VA 22030 AA DELIVERED 11/22/91 10:17 SIGNED: A.SMITH	1/ NA	PRIORITY LTR	15.50	
26184313	1 SHIPPED 11/21/91					15.50
3094402025	WILL KEOUGH GOVERNOR'S OFFICE STATE CAPITOL RICHMOND, VA 23219	JOE JOHNSON WILDER FOR PRESIDENT STE 404 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030 AA DELIVERED 12/04/91 10:20 SIGNED: A.SMITH	1/ 20	PRIORITY BOX	58.75	
78409026	1 SHIPPED 12/03/91					58.75
7185822033	RUTH H JONES GOVERNOR'S OFFICE STATE CAPITOL RICHMOND, VA 23219	DEB MCCEE 91 HAITHENCOTE HARRISON, AR 72344 AA DELIVERED 12/06/91 09:06 SIGNED: D.MCCEE	1/ NA	PRIORITY LTR DISCOUNT	15.50 -2.50	
87157700	1 DROP OFF 12/05/91					13.00
					CONTINUED NEXT PAGE	



BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

RECIPIENT ACTIVITY SUMMARY

PAGE 5 OF 8
DATE 12/14/91
INVOICE NO. 6-505-40177 ACCOUNT NO. 1540-6486-5

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
7185822044	RUTH H JONES GOVERNOR'S OFFICE STATE CAPITOL RICHMOND, VA 23219	INDIA ADIAS WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD STE 404 FAIRFAX, VA 22030 AA DELIVERED 12/06/91 10:23 SIGNED: A.SMITH	1/ NA	PRIORITY LTR DISCOUNT	15.50 -2.50	
87157700	1 DROP OFF 12/05/91					13.00
RECIPIENT SUBTOTAL					100.25	CONTINUED NEXT PAGE



BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

THIRD PARTY ACTIVITY SUMMARY

PAGE 6 OF 8
DATE 12/14/91
INVOICE NO. 6-505-40177 ACCOUNT NO. 1540-6486-5

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
3094402106	RUTH JONES GOVERNOR'S OFFICE STATE CAPITOL	MARTHA DOWNING/CATERING THE PALMER HOUSE WILTON 17 EAST HOWARD STREET	1/ NA	PRIORITY LTR	15.50	

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404082010	JEREMY WILEY SUMNER, CHARLES, CONGRESSMAN 2412 LATOUMEN BOON 2612 WASHINGTON VA 20515 1ST ATTEMPT 12/13/91 09:03 17 72861213 1 SHIPPED 12/12/91	GLENN DAVIDSON OFFICE OF THE GOVERNOR 340 FL STATE CAPITOL BLDG RICHMOND VA 23219 AA DELIVERED 12/13/91 10:43 SIGNED: F. SORRENTINO	1/ 2	PRIORITY FAX	24.25	24.25
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CONTINUED NEXT PAGE

FEDERAL EXPRESS

BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

RECIPIENT ACTIVITY SUMMARY

INVOICE NO. 4-512-04059 ACCOUNT NO. 1568-6486-5

PAGE 6 OF 9
DATE 12/20/91

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
7185822265	RUTH H JONES GOVERNOR'S OFFICE STATE CAPITOL RICHMOND, VA 23219	INDIA ADEAS WILDER FOR PRESIDENT 3050 CHAIN BRIDGE STE 404 FAIRFAX VA 22030 AA DELIVERED 12/13/91 10:21 SIGNED: A. SMITH	1/ NA	PRIORITY LTR DISCOUNT	15.50 -2.50	13.00
87157442 1	PROOF OFF 12/12/91					
7185822276	RUTH H JONES GOVERNOR'S OFFICE STATE CAPITOL RICHMOND, VA 23219	JANE REILEY WILDER FOR PRESIDENT 118 W MAIN ST COMPTON, OH 03301 AA DELIVERED 12/13/91 09:07 SIGNED: M. EASTMAN	1/ NA	PRIORITY LTR DISCOUNT	15.50 -2.50	13.00
87157442 1	PROOF OFF 12/12/91					
1728459170	1004 DEMOCRATIC PARTY 2116 GRAND AVENUE AIA 50312 PES MOHNS 1ST ATTEMPT 12/14/91 08:53 00 04627896 1 SHIPPED 12/13/91	SARAH CALLAHAN SHERA VISTA PALACE WILDER FOR 1700 SHERA VISTA ORLANDO FL 32830 AA DELIVERED 12/14/91 09:10 SIGNED: L. NAYES	1/ S	PRIORITY BOX SAT SERVICE ADDRESS CORR	12.50 14.00 3.00	47.50
RECIPIENT SUBTOTAL			142.00	CONTINUED NEXT PAGE		

FEDERAL EXPRESS

BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

THIRD PARTY ACTIVITY SUMMARY

INVOICE NO. 4-512-04059 ACCOUNT NO. 1568-6486-5

PAGE 7 OF 9
DATE 12/20/91

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
3096402014	RUTH JONES GOVERNOR'S OFFICE STATE CAPITOL RICHMOND, VA 23219	INDIA ADEAS WILDER FOR PRESIDENT STE 404 3050 CHAIN BRIDGE RD FAIRFAX VA 22030 AA DELIVERED 12/03/91 10:21 SIGNED: I. ADEAS	1/ NA	PRIORITY LTR	15.50	15.50
87153360 1	SHIPPED 12/02/91					
3096402034	BILL KEEDON GOVERNOR'S OFFICE STATE CAPITOL RICHMOND, VA 23219	THE HON DEN MCGEE 91 HANSHOBEN COVE MARION, VA 22364 AA DELIVERED 12/04/91 09:20 SIGNED: D. MCGEE	1/ NA	PRIORITY LTR	15.50	15.50
78409026 1	SHIPPED 12/03/91					
THIRD PARTY SUBTOTAL			31.00	PAY THIS AMOUNT 457.25		

FEDERAL EXPRESS

BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

ACTIVITY SUMMARY

INVOICE NO. 4-512-04059 ACCOUNT NO. 1568-6486-5

PAGE 8 OF 9
DATE 12/20/91

* FEDER HAS AUDITED THIS AIRBILL FOR CORRECT PIECES, WEIGHT, AND SERVICE. ANY CHANGES MADE ARE REFLECTED IN THE INVOICE AMOUNT.

FEDERAL EXPRESS

BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

ACTIVITY SUMMARY

INVOICE NO. 4-512-04059 ACCOUNT NO. 1568-6486-5

PAGE 8 OF 9
DATE 12/20/91

ATTACHMENT
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GENERAL DELIVERY

BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

SENDER ACTIVITY SUMMARY INVOICE NO. 4-530-21610 ACCOUNT NO. 1568-6686-5

PAGE 3 OF 7 DATE 01/10/92

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
3338864544	SCOTT BATES WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	MS RUTH JONES GOVERNOR'S OFFICE CAPITOL SQUARE RICHMOND, VA 22219 AA	1/ MA	PRIORITY LTR	15.50	
02897803	1ST ATTEMPT 01/07/92 08:18 17 SHIPPED 01/06/92	DELIVERED 01/07/92 10:50 SIGNED: L. CORNISH				15.50
SENDER SUBTOTAL			217.25	CONTINUED NEXT PAGE		

GENERAL DELIVERY

BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

RECIPIENT ACTIVITY SUMMARY INVOICE NO. 4-530-21610 ACCOUNT NO. 1568-6686-5

PAGE 4 OF 7 DATE 01/10/92

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
3418726923	RUTH JONES GOVERNOR'S OFFICE STATE CAPITOL RICHMOND, VA 23219	INDIA ADEAS WILDER FOR PRESIDENT STE 404 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030 AA	1/ MA	PRIORITY LTR DISCOUNT	15.50 -2.50	
07157265	1 DROP OFF 12/17/91	DELIVERED 12/18/91 10:22 SIGNED: A. SMITH				13.00
RECIPIENT SUBTOTAL			13.00	CONTINUED NEXT PAGE		

GENERAL DELIVERY

BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

THIRD PARTY ACTIVITY SUMMARY INVOICE NO. 4-530-21610 ACCOUNT NO. 1568-6686-5

PAGE 5 OF 7 DATE 01/10/92

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
3518445954	WILDER FOR PRESIDENT MCCAIN VA JERSEY CITY, NJ 07302	MR ERNEST BONNER BONNER & BONNER 370 17TH ST-51E 3900 DENVER, CO 80202 AA	1/ MA	PRIORITY LTR DISCOUNT	15.50 -2.50	
47504061	1 DROP OFF 12/16/91	DELIVERED 12/17/91 09:26 SIGNED: T. WINTHROP				13.00
3418725155	BILL KEOUGH GOVERNOR'S OFFICE STATE CAPITOL RICHMOND, VA 23219	NAME REILEY WILDER FOR PRESIDENT 120 W MAIN ST CONCORD, NH 03301 AA	1/ MA	PRIORITY LTR	15.50	
07156723	1 SHIPPED 12/17/91	DELIVERED 12/18/91 09:44 SIGNED: R. EASTMAN				15.50
3418725122	RUTH JONES GOVERNOR'S OFFICE STATE CAPITOL RICHMOND, VA 23219	INDIA ADEAS WILDER FOR PRESIDENT ST 404 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030 AA	1/ MA	PRIORITY LTR DISCOUNT	15.50 -2.50	
07157151	1 DROP OFF 12/19/91	DELIVERED 12/20/91 10:54 SIGNED: J. THOMPSON				13.00
			CONTINUED NEXT PAGE			

GENERAL DELIVERY

BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

THIRD PARTY ACTIVITY SUMMARY INVOICE NO. 4-530-21610 ACCOUNT NO. 1568-6686-5

PAGE 6 OF 7 DATE 01/10/92

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
3418725144	RUTH JONES GOVERNOR'S OFFICE	CHERYL LOSSER	1/ MA	PRIORITY LTR DISCOUNT	15.50 -2.50	

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07166122 1 SHIPPED 01/03/92

SIGNED: V. JARAMILLO

13.90

CONTINUED NEXT PAGE

FEDERAL
EXPRESSBILL TO: WILDER FOR PRESIDENT
3650 CHAIN BRIDGE RD
FAIRFAX, VA 22030

THIRD PARTY ACTIVITY SUMMARY

INVOICE NO. 4-538-03013 ACCOUNT NO. 1568-6488-5

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
7185822604	BILL KEOUGH GOVERNORS OFFICE STATE CAPITOL RICHMOND, VA 23219	THE HON ORVANT HILSAPS TENNESSEE SECRETARY OF STATE STATE CAPITOL NASHVILLE, TN 37243 AA DELIVERED 01/06/92 09:45 SIGNED: H. TOLLESON	1/ NA	PRIORITY LTR	13.50	
07166122	1 SHIPPED 01/03/92					13.50
7185822630	BILL KEOUGH GOVERNORS OFFICE STATE CAPITOL RICHMOND, VA 23219	THE HON FOX MCKEITHEN LOUISIANA SECRETARY OF STATE 5531 NORTH LN STATE ARCHIVES BATON ROUGE, LA 70809 AA DELIVERED 01/06/92 09:32 SIGNED: S. OSBORN	1/ NA	PRIORITY LTR	13.50	
07166122	1 SHIPPED 01/03/92					13.50
7185822641	BILL KEOUGH GOVERNORS OFFICE STATE CAPITOL RICHMOND, VA 23219	MR WILL BURNS TENNESSEE COMMO 376 500 JAMES E POLE BLVD NASHVILLE, TN 37243 AA DELIVERED 01/06/92 09:48 SIGNED: W. BURNS	1/ NA	PRIORITY LTR	13.50	
07166122	1 SHIPPED 01/03/92					13.50

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FEDERAL
EXPRESSBILL TO: WILDER FOR PRESIDENT
3650 CHAIN BRIDGE RD
FAIRFAX, VA 22030

THIRD PARTY ACTIVITY SUMMARY

PAGE 10 OF 11
DATE 01/20/92
INVOICE NO. 4-538-03013 ACCOUNT NO. 1568-6488-5

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
7185822615	BILL KEOUGH GOVERNORS OFFICE STATE CAPITOL RICHMOND, VA 23219	THELTON-RICHARD J ANSTEN MICHIGAN SECRETARY OF STATE 208 NORTH CAPITOL LTH PL MUTU LANSING, MI 48933 AA DELIVERED 01/07/92 09:55 SIGNED: L. SHERIDAN	1/ NA	PRIORITY LTR DISCOUNT	13.50 -2.50	
07155881	1 DROP OFF 01/06/92					13.00
3494662883	HANE REILEY WILDER FOR PRESIDENT 120 N MAIN ST CONCORD, NH 03301	EVAN JONES ILLESIBLE STATE CAPITOL RICHMOND, VA 23219 AA DELIVERED 01/09/92 11:37 SIGNED: L. CORNISH	1/ NA	STANDARD LTR DISCOUNT	11.50 -2.50	
688501	1 DROP OFF 01/06/92					9.00
5034802842	GLOBAL TRAVEL 1911 N FORT MEYER ARLINGTON, VA 22209	HANE REILEY 120 N MAIN ST CONCORD, NH 03301 AA DELIVERED 01/16/92 11:22 SIGNED: W. EASTMAN	1/ NA	STANDARD LTR DISCOUNT	11.50 -2.50	
6635073	1 DROP OFF 01/13/92					9.00
THIRD PARTY SUBTOTAL			206.75	PAY THIS AMOUNT		532.75

FEDERAL
EXPRESSBILL TO: WILDER FOR PRESIDENT
3650 CHAIN BRIDGE RD
FAIRFAX, VA 22030

ACTIVITY SUMMARY

PAGE 11 OF 11
DATE 01/20/92
INVOICE NO. 4-538-03013 ACCOUNT NO. 1568-6488-5

FEDERX HAS ADJUSTED THIS AIRBILL FOR CORRECT PIECES, WEIGHT, AND SERVICE. ANY CHARGES MADE ARE REFLECTED IN THE INVOICE AMOUNT.

ATTACHMENT 6Page 26 of 122FEDERAL
EXPRESS

FEDERAL EXPRESS

BILL TO: WILDER FOR PRESIDENT
3030 CHAIN BRIDGE RD
FAIRFAX, VA 22030

THIRD PARTY ACTIVITY SUMMARY

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DATE 01/20/92
INVOICE NO. 4-538-03013 ACCOUNT NO. 1568-6886-3

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
3494662091	MICHAEL EASTMAN WILDER FOR PRESIDENT 120 N MAIN ST CONCORD, NH 03301	GLENED AVIDSON GOVERNOR WILDER'S OFFICE CAPITAL BLDG RICHMOND, VA 23219 AA DELIVERED 12/30/91 12:34 SIGNED: F. TORRENTINO	1/ NA	STANDARD LTR DISCOUNT	11.50 -2.50	9.00
75942416	1 DROP OFF 12/27/91					
7185822394	BILL KEOUGH GOVERNORS OFFICE STATE CAPITOL RICHMOND, VA 23219	MS BOBBA STEWART UTAH DEMOCRATIC PARTY 453 WEST BERKLEY 2467 LAKE CITY UT 84115 AA DELIVERED 12/31/91 06:25 SIGNED: P. SEVENSEN	1/ NA	PRIORITY LTR DISCOUNT	15.50 -3.50	13.00
87166763	1 DROP OFF 12/30/91					
7185822405	BILL KEOUGH GOVERNORS OFFICE STATE CAPITOL RICHMOND, VA 23219	THE HON JOAN ANDERSON GROVE MINNESOTA SEC OF STATE 100 STATE OFFICE BUILDING ST. PAUL, MN 55155 AA DELIVERED 12/31/91 09:14 SIGNED: C. EVANS	1/ NA	PRIORITY LTR DISCOUNT	15.50 -2.50	13.00
87166763	1 DROP OFF 12/30/91					

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FEDERAL EXPRESS

BILL TO: WILDER FOR PRESIDENT
3030 CHAIN BRIDGE RD
FAIRFAX, VA 22030

THIRD PARTY ACTIVITY SUMMARY

PAGE 7 OF 11
DATE 01/20/92
INVOICE NO. 4-538-03013 ACCOUNT NO. 1568-6886-3

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
7185822446	BILL KEOUGH GOVERNORS OFFICE STATE CAPITOL RICHMOND, VA 23219	BOB SLAGLE TEXAS DEMOCRATIC PARTY STE 20 815 BRADY & ST AUSTIN, TX 78701 AA DELIVERED 12/31/91 09:04 SIGNED: K. THOMPSON	1/ NA	PRIORITY LTR DISCOUNT	15.50 -2.50	13.00
87166763	1 DROP OFF 12/30/91					
7185822420	BILL KEOUGH GOVERNORS OFFICE STATE CAPITOL RICHMOND, VA 23219	THE HON NATALIE REYERS COLORADO SEC OF STATE STE 200 1540 BROADWAY DENVER, CO 80203 AA DELIVERED 12/31/91 08:53 SIGNED: M. LINDSEY	1/ NA	PRIORITY LTR DISCOUNT	15.50 -2.50	13.00
87166763	1 DROP OFF 12/30/91					
7185822451	BILL KEOUGH GOVERNORS OFFICE STATE CAPITOL RICHMOND, VA 23219	THE HON JOAN ANDERSON GROVE MINNESOTA SECRETARY OF STATE 100 STATE OFFICE BUILDING ST. PAUL, MN 55155 AA DELIVERED 01/02/92 08:19 SIGNED: S. RUAN	1/ NA	PRIORITY LTR	15.50	15.50
87166752	1 SHIPPED 12/31/91					

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BILL TO: WILDER FOR PRESIDENT
3030 CHAIN BRIDGE RD
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THIRD PARTY ACTIVITY SUMMARY

PAGE 8 OF 11
DATE 01/20/92
INVOICE NO. 4-538-03013 ACCOUNT NO. 1568-6886-3

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
7185822442	BILL KEOUGH GOVERNORS OFFICE STATE CAPITOL RICHMOND, VA 23219	THE HON NATALIE REYERS COLORADO SECRETARY OF STATE 1540 BROADWAY STE 200 DENVER, CO 80203 AA DELIVERED 01/02/92 08:30 SIGNED: M. LINDSEY	1/ NA	PRIORITY LTR	15.50	15.50
87166752	1 SHIPPED 12/31/91					
7631173001	ROBERT D WEINTRAUB 401 E 74TH ST 7C NEW YORK, NY 10021	RICHARD HURLEY 642 HAWTHORNE ST ROSELNY, NY 11203 AA DELIVERED 01/02/92 12:20 SIGNED: E. WALKER	1/ 2	PRIORITY PAR DISCOUNT	24.25 -2.50	21.75
80821 WET WTRAUB 90347351	1 DROP OFF 12/31/91					
7185822593	BILL KEOUGH GOVERNORS OFFICE STATE CAPITOL RICHMOND, VA 23219	MS HELODIE JACKSON ARIZONA DEMOCRATIC PARTY 100 1509 N CENTRAL PHOENIX, AZ 85004 AA DELIVERED 01/06/92 09:51 SIGNED: V. JARAMILLO	1/ NA	PRIORITY LTR	15.50	15.50
87166122	1 SHIPPED 01/03/92					

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BILL TO: WILDER FOR PRESIDENT
3030 CHAIN BRIDGE RD
FAIRFAX, VA 22030

THIRD PARTY ACTIVITY SUMMARY



BILL TO: WILDER FOR PRESIDENT
5050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

THIRD PARTY ACTIVITY SUMMARY

INVOICE # 543-37940 ACCOUNT NO. 1568-6686-5
PAGE 3 OF 6
DATE 01/25/92

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
7185822453	COURTNEY O'SULLIVAN GOVERNORS OFFICE STATE CAPITOL RICHMOND, VA 23219	HEATHER SHAFF NETWORK PUBLICATIONS 100 MAIN ST NASHUA, NH 03060 AA DELIVERED 01/09/92 09:47 SIGNED: S. RYDER	1	STANDARD LTR DISCOUNT	11.50 -2.50	9.00
71555420 1	DROP OFF 01/08/92					
7431169630	ROBERT B WEITRAUB 401 E 74TH 7C NEW YORK, NY 10021 94	IRIS BAEZ OFFICE OF ASSEMBLYMAN STEPHEN DREISER 177 DREISER LOOP DREISER BROOKLYN, NY 11475 AA DELIVERED 01/09/92 09:48 SIGNED: G. RUBIN	1	PRIORITY LTR	15.50	15.50
34038500 1	SHIPPED 01/08/92					
3418725041	BILL KEUGH GOVERNORS OFFICE STATE CAPITOL RICHMOND, VA 23219	THE HON DICK HOLMES MISSISSIPPI SEC OF STATE 481 MISSISSIPPI ST JACKSON, MS 39201 AA DELIVERED 01/13/92 08:18 SIGNED: H. ROYIN	1	PRIORITY LTR	15.50	15.50
33717710 1	SHIPPED 01/10/92					

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BILL TO: WILDER FOR PRESIDENT
5050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

THIRD PARTY ACTIVITY SUMMARY

INVOICE # 543-37940 ACCOUNT NO. 1568-6686-5
PAGE 4 OF 6
DATE 01/25/92

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
7185822512	BILL KEUGH GOVERNORS OFFICE STATE CAPITOL RICHMOND, VA 23219	THE HON RICHARD J AUSTIN MICHIGAN SEC OF STATE ATT & N 208 W CAPITOL 4TH FL MUTUAL B LANSING, MI 48933 AA DELIVERED 01/13/92 09:20 SIGNED: L. SHERIDAN	1	PRIORITY LTR DISCOUNT	15.50 -2.50	13.00
33726000 1	DROP OFF 01/10/92					
7185822523	BILL KEUGH GOVERNORS OFFICE STATE CAPITOL RICHMOND, VA 23219	THE HON MICHAEL J CONNOLLY MASSACHUSETTS SEC OF STATE AT 1 ASHBURTON PL 1785 BOSTON, MA 02108 AA DELIVERED 01/13/92 09:46 SIGNED: E. BROWN	1	PRIORITY LTR DISCOUNT ADDRESS CORR	15.50 -2.50 3.00	16.00
33726000 1	DROP OFF 01/10/92					
THIRD PARTY SUBTOTAL					72.50 BY THIS AMOUNT	158.50

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BILL TO: WILDER FOR PRESIDENT
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ACTIVITY SUMMARY

INVOICE NO. 4-37940 ACCOUNT NO. 1568-6686-5
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DATE 01/25/92

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BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

SENDER ACTIVITY SUMMARY

INVOICE NO. 4-549-65359 ACCOUNT NO. 1568-6686-5
PAGE 1 OF 9
DATE 01/21/92

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
744911190	WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	NIEL CATES 166 TREZEBANT BRADFORD, TN 38316 AM DELIVERED 01/20/92 08:48 SIGNED: N.CATES	3	ECONOMY PKG DISCOUNT	15.00 -2.50	12.50
0887784	1 DROP OFF 01/16/92					
SENDER SUBTOTAL					12.50	CONTINUED NEXT PAGE

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BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

RECIPIENT ACTIVITY SUMMARY

INVOICE NO. 4-549-65359 ACCOUNT NO. 1568-6686-5
PAGE 2 OF 9
DATE 01/21/92

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
3418725074	BOTH JONES GOVERNORS OFFICE STATE CAPITOL RICHMOND, VA 23219	SARAH CALLAHAN WILDER FOR PRESIDENT STE 404 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030 AA DELIVERED 01/16/92 10:24 SIGNED: S.CALLAHAN	1 NA	PRIORITY LTR DISCOUNT	15.50 -2.50	13.00
03385970	1 DROP OFF 01/15/92					
RECIPIENT SUBTOTAL					13.00	CONTINUED NEXT PAGE

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BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
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THIRD PARTY ACTIVITY SUMMARY

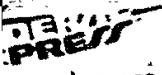
INVOICE NO. 4-549-65359 ACCOUNT NO. 1568-6686-5
PAGE 3 OF 9
DATE 01/31/92

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
7185822501	BILL KEOUGH GOVERNORS OFFICE STATE CAPITOL RICHMOND, VA 23219	THE HON RALPH MUNROE WASHINGTON SEC OF STATE LEGISLATIVE BLDG OLYMPIA, WA 98504 AA DELIVERED 01/14/92 10:28 SIGNED: L.P. JOHN	1 NA	PRIORITY LTR	15.50	15.50
03371270	1 SHIPPED 01/13/92					
7941808066	BILL KEOUGH GOVERNORS OFFICE STATE CAPITOL RICHMOND, VA 23219	THE HON FOX MCKEITHEN SEC OF STATE STATE OF LOUISIA 3851 ESSEN LANE STATE ARCHIVE BATON ROUGE, LA 70809 AA DELIVERED 01/14/92 09:21 SIGNED: B.BESSIX	1 NA	PRIORITY LTR	15.50	15.50
03371270	1 SHIPPED 01/13/92					
7941808070	BILL KEOUGH GOVERNORS OFFICE STATE CAPITOL RICHMOND, VA 23219	MS RHODA STRUHS UTAH DEMOCRATIC PARTY 453 WEST BEARCAT SALT LAKE CITY, UT 84115 AA DELIVERED 01/14/92 08:53 SIGNED: L. STRAUB	1 NA	PRIORITY LTR	15.50	15.50
1270	1 SHIPPED 01/13/92					
					CONTINUED NEXT PAGE	

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ILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

THIRD PARTY ACTIVITY SUMMARY

INVOICE NO. 4-549-65359 ACCOUNT NO. 1568-6686-5
PAGE 4 OF 9
DATE 01/31/92

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & HEIGHT	SERVICES	CHARGES	NET CHARGES
941808081	BILL KEOUGH GOVERNORS OFFICE STATE CAPITOL RICHMOND, VA 23219	THE HON JOAN ANDERSON GROHE MINNESOTA SEC OF STATE 180 STATE OFFICE BLDG ST. PAUL, MN 55155 AA DELIVERED 01/14/92 09:54 SIGNED: C. EVANS	1/ NA	PRIORITY LTR	15.50	15.50
371270 1	SHIPPED 01/13/92					
941808092	BILL KEOUGH GOVERNORS OFFICE STATE CAPITOL RICHMOND, VA 23219	THE HON NATALIE MEYERS COLORADO SEC OF STATE STE 200 1560 BROADWAY DENVER, CO 80203 AA DELIVERED 01/14/92 08:35 SIGNED: M. LINDSEY	1/ NA	PRIORITY LTR	15.50	15.50
371270 1	SHIPPED 01/13/92					
941808103	BILL KEOUGH GOVERNORS OFFICE STATE CAPITOL RICHMOND, VA 23219	THE HON ALAN BEERMAN NEBRASKA SEC OF STATE STE 230 STATE CAPITOL LINCOLN, NE 68509 AA DELIVERED 01/14/92 09:21 SIGNED: J. BARRON	1/ NA	PRIORITY LTR	15.50	15.50
3371270 1	SHIPPED 01/13/92					

CONTINUED NEXT PAGE

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ILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

THIRD PARTY ACTIVITY SUMMARY

INVOICE NO. 4-549-65359 ACCOUNT NO. 1568-6686-5
PAGE 5 OF 9
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TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & HEIGHT	SERVICES	CHARGES	NET CHARGES
7941808114	BILL KEOUGH GOVERNORS OFFICE STATE CAPITOL RICHMOND, VA 23219	THE HON PHIL KETSILING OREGON SEC OF STATE RM 141 STATE CAPITOL BUILDING SALEM, OR 97310 AA DELIVERED 01/14/92 09:35 SIGNED: S. SCHAEFER	1/ NA	PRIORITY LTR	15.50	15.50
3371270 1	SHIPPED 01/13/92					
7941808125	BILL KEOUGH GOVERNORS OFFICE STATE CAPITOL RICHMOND, VA 23219	THE HON BRYANT HILSDA TENNESSEE SEC OF STATE STATE CAPITOL NASHVILLE, TN 37243 AA DELIVERED 01/14/92 09:41 SIGNED: C. RICHMOND	1/ NA	PRIORITY LTR	15.50	15.50
3371270 1	SHIPPED 01/13/92					
7941808136	BILL KEOUGH GOVERNORS OFFICE STATE CAPITOL RICHMOND, VA 23219	THE HON KATHLEEN CONNELL RHODE ISLAND SEC OF STATE STATE HOUSE PROVIDENCE, RI 02903 AA DELIVERED 01/14/92 09:57 SIGNED: M. LORIA	1/ NA	PRIORITY LTR	15.50	15.50
3371270 1	SHIPPED 01/13/92					

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ILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

THIRD PARTY ACTIVITY SUMMARY

INVOICE NO. 4-549-65359 ACCOUNT NO. 1568-6686-5
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TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & HEIGHT	SERVICES	CHARGES	NET CHARGES
7941808140	BILL KEOUGH GOVERNORS OFFICE STATE CAPITOL RICHMOND, VA 23219	MELODIE JACKSON ARIZONA DEMOCRATIC PARTY 100 1509 NORTH CENTRAL PHOENIX, AZ 85004 AA DELIVERED 01/14/92 09:58 SIGNED: V. JARAMILLO	1/ NA	PRIORITY LTR	15.50	15.50
03371270 1	SHIPPED 01/13/92					
7941808151	BILL KEOUGH GOVERNORS OFFICE STATE CAPITOL RICHMOND, VA 23219	MR JEFF LANIER STATE OF GEORGIA DIRECTOR OF STATE CAPITOL ATLANTA, GA 30334 AA DELIVERED 01/14/92 09:29 SIGNED: M. MOSER	1/ NA	PRIORITY LTR	15.50	15.50
03371270 1	SHIPPED 01/13/92					
7185822490	A RUSSELL GOVERNORS OFFICE STATE CAPITOL RICHMOND, VA 23219	MARGARET JOHNSTON DELL COMPUTER CORPORATION 9505 ARBORETUM BOULEVARD AUSTIN, TX 78759 AA DELIVERED 01/15/92 09:05 SIGNED: R. JEHETT	1/ NA	PRIORITY LTR	15.50	15.50
03370975 1	SHIPPED 01/14/92					

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BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

SENDER ACTIVITY SUMMARY

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PAGE 1 OF 2
DATE 01/31/92

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
1922629321*	BILL KEOLSH WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	ANITA LOHMAN-PERRELL THE BORMAN GROUP 1015 MASSACHUSETTS AVE NW WASHINGTON, DC 20036 AA DELIVERED 01/22/92 09:56 SIGNED: M. HERNANDEZ	1/ NA	PRIORITY LTR DISCOUNT ACCT & CORR	15.50 -2.50 5.00	18.00
03579263	1 DROP OFF 01/21/92					
SENDER SUBTOTAL				18.00	PAY THIS AMOUNT	18.00

QUESTIONS? CALL OUR BILLING SERVICE CENTER 800-822-1147, 7 AM - 6 PM (CST) MONDAY-FRIDAY (IN MEMPHIS, TN CALL 901-397-2000)
TO ENSURE PROPER CREDIT PLEASE RETURN THE REMITTANCE ADVICE (1ST PAGE OF THIS INVOICE) WITH YOUR PAYMENT.
MAIL TO: FEDERAL EXPRESS CORP., P.O. BOX 1140, DEPT. A, MEMPHIS, TN 38101-1140

FDEx M-0148 5/91



BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

ACTIVITY SUMMARY

INVOICE NO. 4-549-65360 ACCOUNT NO. 1568-6686-5
PAGE 2 OF 2
DATE 01/31/92

FEDERAL EXPRESS IS UNABLE TO BILL THE THIRD PARTY ACCOUNT INDICATED ON THE ORIGINAL AIRBILL. THEREFORE, ACCORDING TO THE TERMS AND CONDITIONS LISTED ON THE BACK OF OUR AIRBILLS AND IN OUR MOST RECENT SERVICE GUIDE, THE CHARGES FOR THIS SHIPMENT MUST BE BILLED TO THE SENDER.

QUESTIONS? CALL OUR BILLING SERVICE CENTER 800-822-1147, 7 AM - 6 PM (CST) MONDAY-FRIDAY (IN MEMPHIS, TN CALL 901-397-2000)
TO ENSURE PROPER CREDIT PLEASE RETURN THE REMITTANCE ADVICE (1ST PAGE OF THIS INVOICE) WITH YOUR PAYMENT
MAIL TO: FEDERAL EXPRESS CORP., P.O. BOX 1140, DEPT. A, MEMPHIS, TN 38101-1140

FDEx M-0145 5/91

ATTACHMENT 6
Page 31 of 122

WILDER FOR PRESIDENT COMMITTEE

FINAL AUDIT REPORT

RESPONSE TO RECOMMENDATION #6

SUBJECT: Matching Funds In Excess Of Entitlement

The Audit Division's "Schedule of Accounts Payable Not Considered Qualified Campaign Expenses" includes \$456.75 in alleged undocumented expenses to Federal Express.

In connection therewith, attached is a complete reconciliation of the Committee's Federal Express Account, with detailed documentation to support all payments to Federal Express.

Accordingly, the Committee requests that the referenced \$456.75 be reclassified as a qualified campaign expense and included in the Committee's NOCO statement.

05070122

WILDER FOR PRESIDENT COMMITTEE
FEDERAL EXPRESS ACCOUNT ANALYSIS

ACCOUNT NUMBER

INVOICE NUMBER

PAYMENT DUE

CHECK AMOUNT

CHECK NUMBER

COMMENTS

ACCOUNT NUMBER	INVOICE NUMBER	PAYMENT DUE	CHECK AMOUNT	CHECK NUMBER	COMMENTS
1529-5072-1	4-323-87248	15.00	(15.00)	120	Paid
1529-5072-1	4-349-86802	13.00	(13.00)	146	Paid
1529-5072-1	4-356-51278	20.00	(20.00)	148	Paid
1529-5072-1	4-362-39649	9.00	(9.00)	150	Paid
1529-5072-1	4-304-24276	24.50	(24.50)	165	Paid
1529-5072-1	4-394-72429	20.00	(20.00)	176	Paid
1529-5072-1	4-381-34607	46.25	(46.25)	180	Paid
1529-5072-1	4-401-51634	21.75	(21.75)	207	Paid
1529-5072-1	4-408-00444	13.00	(13.00)	211	Paid
1529-5072-1	4-427-10722	56.25	(56.25)	226	Paid
1529-5072-1	4-420-55212	34.75	(34.75)	230	Paid
1529-5072-1	4-446-99112	114.25	(114.25)	287	Paid
1529-5072-1	4-453-69206	115.00	(738.00)	332	Paid
1529-5072-1	4-467-56142	460.75	"	"	Paid
1529-5072-1	4-440-28517	41.50	"	"	Paid
1529-5072-1	4-460-31495	121.25	(23.50)	598	Paid
1529-5072-1	4-552-94630	23.50	(3,724.75)	CCA	Paid
None	4-493-60641	24.25	"	"	Paid
1568-6686-5	4-512-04059	457.25	"	"	Paid
1568-6686-5	4-493-12332	17.00	"	"	Paid
1568-6686-5	4-524-59068	130.00	"	"	Paid
1529-5072-1	4-474-28334	636.00	"	"	Paid
1529-5072-1	4-493-62902	58.75	"	"	Paid
1568-6686-5	4-518-84727	205.00	"	"	Paid
1568-6686-5	4-505-40177	258.00	"	"	Paid
1568-6686-5	4-530-21610	284.75	"	"	Paid
1568-6686-5	4-499-09607	372.75	"	"	Paid
1568-6686-5	1-502-58544	15.50	"	"	Paid
1529-5072-1	4-487-68148	973.25	"	"	Paid
1529-5072-1	4-480-25325	274.50	"	"	Paid
1568-6686-5	4-563-10434	256.25	None	None	Was Outstanding
1568-6686-5	4-556-33310	13.00	None	None	Was Outstanding
1568-6686-5	4-556-33311	13.00	None	None	Was Outstanding
1568-6686-5	4-549-65359	268.50	None	None	Was Outstanding
1568-6686-5	4-549-65360	18.00	None	None	Was Outstanding
1568-6686-5	4-543-37940	158.50	None	None	Was Outstanding
1568-6686-5	4-538-03013	532.75	None	None	Was Outstanding
1568-6686-5	None	None	(500.00)	103	Deposit
1568-6686-5	None	None	(20.50)	603	Unallocated Payment
1568-6686-5	None	None	(722.25)	709	Final Payment
1568-6686-5	None	None			

ATTACHMENT

Page 34 of 122

ACCOUNT BALANCE

\$0.00

TOTAL INVOICE AMOUNTS DUE: \$6,116.75
TOTAL P VTS MADE: (\$6,116.75)

WILDER EXPLORATORY COMMITTEE 1-91
P.O. BOX 1515
RICHMOND, VA 23212

April 22 1992

621

PAY TO THE ORDER OF Federal Express \$ 46.50

Forty-six and 50/100

NationsBank
NationsBank of Virginia, N.A.
Albemarle, VA

1922628606, 1922628654
1922628676

FOR

056007387r 488224333r 06213r 10000001650

Check was payable to Federal Express
but was deposited & OWED to the
Treas. of Virginia.

ENDORSE HERE

FOR DEPOSIT TO THE CREDIT OF
TREASURER OF VIRGINIA

52 5773

DO NOT WRITE, STAMP OR SIGN BELOW THIS LINE
© 1981/82 FEDERAL RESERVE SYSTEM

051000017
M2A/2

950701920



REMITTANCE ADVICE

Payment Due in 15 Days of Invoice Date

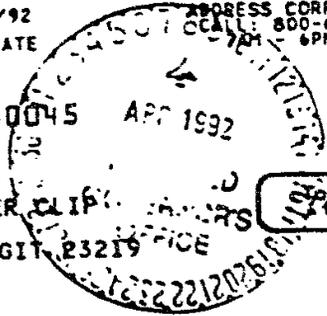
1173-9604-5 4-611-14856 04/03/92
ACCOUNT NUMBER INVOICE NUMBER DATE

ADDRESS CORRECTIONS?
CALL: 800-822-1147
7AM - 6PM CST

41.00
AMOUNT DUE

2
AIRBILLS

1173960446111485621000410045



PLEASE DO NOT STAPLE OR PAPER CLIP

To ensure proper credit, please return this document with your remittance.

10048XXXXXXXXXXXXXXXXXXXX 5-DIGIT 23219
GOVERNORS OFFICE
RUTH JONES
STATE CAPITOL 3RD FLOOR
RICHMOND, VA 23219

Mail Payment to:

FEDERAL EXPRESS CORPORATION
P.O. Box 1140 Dept A
Memphis, Tn 38101-1140

QUESTIONS? CALL OUR BILLING SERVICE CENTER, 800-822-1147, 7AM - 6PM (CST) MONDAY - FRIDAY (IN MEMPHIS, TN, CALL 801-387-2000).
TO ENSURE PROPER CREDIT PLEASE RETURN THE REMITTANCE ADVICE (1ST PAGE OF THIS INVOICE) WITH YOUR PAYMENT.
MAIL TO: FEDERAL EXPRESS CORP., P.O. BOX 1140, DEPT. A, MEMPHIS, TN 38101-1140

Form M-0148 5/91



SENDER ACTIVITY SUMMARY

PAGE 1 OF 1
DATE 04/03/92

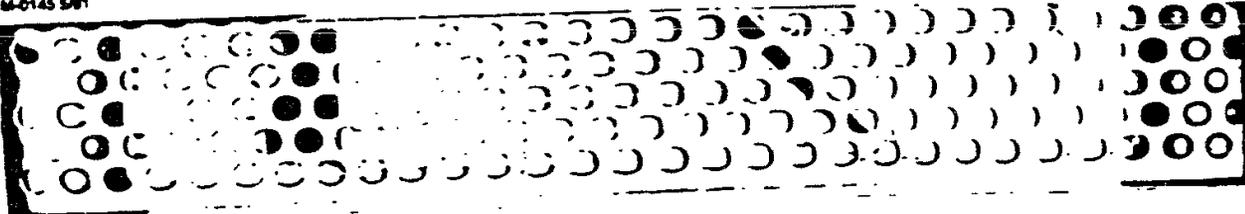
BILL TO: GOVERNORS OFFICE
STATE CAPITOL
RICHMOND, VA 23219

INVOICE NO. 4-611-14856 ACCOUNT NO. 1173-9604

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
2628406	BILL KEUGH GOVERNORS OFFICE STATE CAPITOL RICHMOND, VA 23219	INDIA ADEAS MOTOR COMMITTEE 3RD FL 1705 NEW HAMPSHIRE AVE NW WASHINGTON, DC 20009 AA DELIVERED 03/26/92 10:19 SIGNED: T. MATSON	1/ NA	PRIORITY LTR	15.50	15.50
03379040 1	SHIPPED 03/25/92					
7185822070	GOVERNOR L DOUGLAS HILDER GOVERNORS OFFICE STATE CAPITOL RICHMOND, VA 23219	MRS NANCY PETERSON MOTHER OF THE YEAR LUNCHEON T 700 SETTLERS LANDING RD HAMPTON, VA 23669 AA DELIVERED 03/28/92 11:23 SIGNED: N. JOHNSON	1/ NA	PRIORITY LTR SAT SERVICE	15.50 10.00	25.50
03379025 1	SHIPPED 03/27/92					
SENDER SUBTOTAL			41.00	PAY THIS AMOUNT	41.00	

QUESTIONS? CALL OUR BILLING SERVICE CENTER, 800-822-1147, 7AM - 6PM (CST) MONDAY - FRIDAY (IN MEMPHIS, TN, CALL 801-387-2000).
TO ENSURE PROPER CREDIT PLEASE RETURN THE REMITTANCE ADVICE (1ST PAGE OF THIS INVOICE) WITH YOUR PAYMENT
MAIL TO: FEDERAL EXPRESS CORP., P.O. BOX 1140, DEPT. A, MEMPHIS, TN 38101-1140

Form M-0148 5/91



Paid # 621

ATTACHMENT 6
Page 36 of 122

EXPRESS

REMITTANCE ADVICE

Payment Due in 15 Days of Invoice Date

1173-9604-5 4-618-09824 04/10/92
ACCOUNT NUMBER INVOICE NUMBER DATE

ADDRESS CORRECTIONS?
CALL: 800-622-1147
7AM - 6PM CST

62.00
AMOUNT DUE

AIRBILLS

1173960446180982406000620008

PLEASE DO NOT STAPLE OR PAPER CLIP

To ensure proper credit, please return
this document with your remittance.

10047XXXXXXXXXXXXXXX 5-DIGIT 23219
GOVERNORS OFFICE
RUTH JONES
STATE CAPITOL 3RD FLOOR
RICHMOND, VA 23219

Mail Payment to:

FEDERAL EXPRESS CORPORATION
P.O. Box 1140 Dept A
Memphis, Tn 38101-1140

QUESTIONS? CALL OUR BILLING SERVICE CENTER, 800-622-1147, 7AM - 6PM (CST) MONDAY - FRIDAY (IN MEMPHIS, TN, CALL 901-387-3000).
TO ENSURE PROPER CREDIT PLEASE RETURN THE REMITTANCE ADVICE (1ST PAGE OF THIS INVOICE) WITH YOUR PAYMENT.
MAIL TO: FEDERAL EXPRESS CORP., P.O. BOX 1140, DEPT. A, MEMPHIS, TN 38101-1140

FE M-0145 5/91



BILL TO: GOVERNORS OFFICE STATE CAPITOL RICHMOND, VA 23219
SENDER ACTIVITY SUMMARY
INVOICE NO. 4-618-09824 ACCOUNT NO. 1173-9604-5
PAGE 1 OF 2 DATE 04/10/92

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
1922628643	PRESS OFFICE GOVERNORS OFFICE STATE CAPITOL RICHMOND, VA 23219	MR JIM FREE CHARLES E WALKER ASSOC INC 1720 PENNSYLVANIA AVE NW WASHINGTON, DC 20006 AA DELIVERED 04/01/92 09:19 SIGNED: P. STEHART	1/ NA	PRIORITY LTR	15.50	15.50
03379003 1	SHIPPED 03/31/92					
1922628656	BILL KEOUGH GOVERNORS OFFICE STATE CAPITOL RICHMOND, VA 23219	INDIA ADEAS WILDER COMMITTEE 3RD FL 1708 NEW HAMPSHIRE AVE NW WASHINGTON, DC 20009 AA DELIVERED 04/01/92 10:09 SIGNED: B. HOLMES	1/ NA	PRIORITY-LTR	15.50	15.50
03379003 1	SHIPPED 03/31/92					
1922628676	BILL KEOUGH GOVERNORS OFFICE STATE CAPITOL RICHMOND, VA 23219	INDIA ADEAS WILDER COMMITTEE 3RD FL 1708 NEW HAMPSHIRE AVE WASHINGTON, DC 20009 AA DELIVERED 04/02/92 10:20 SIGNED: B. HOLMES	1/ NA	PRIORITY LTR	15.50	15.50
03378002 1	SHIPPED 04/01/92					

CONTINUED NEXT PAGE

QUESTIONS? CALL OUR BILLING SERVICE CENTER 800-622-1147, 7AM - 6PM (CST) MONDAY - FRIDAY (IN MEMPHIS, TN, CALL 901-387-3000).
TO ENSURE PROPER CREDIT PLEASE RETURN THE REMITTANCE ADVICE (1ST PAGE OF THIS INVOICE) WITH YOUR PAYMENT
MAIL TO: FEDERAL EXPRESS CORP., P.O. BOX 1140, DEPT. A, MEMPHIS, TN 38101-1140

FE M-0145 5/91



BILL TO: GOVERNORS OFFICE STATE CAPITOL RICHMOND, VA 23219
SENDER ACTIVITY SUMMARY
INVOICE NO. 4-618-09824 ACCOUNT NO. 1173-9604-5
PAGE 2 OF 2 DATE 04/10/92

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
1922628680	NAJCY H MAUPIN GOVERNORS OFFICE STATE CAPITOL RICHMOND, VA 23219	DEBORAH H WAKEFIELD HAMPTON CONVENTIONS & TOURISM 2 EATON STREET HAMPTON, VA 23669 AA DELIVERED 04/06/92 09:15 SIGNED: A. OAKLEY	1/ NA	PRIORITY LTR	15.50	15.50
87160975 1	SHIPPED 04/03/92					
SENDER SUBTOTAL			62.00	PAY THIS AMOUNT		62.00

QUESTIONS? CALL OUR BILLING SERVICE CENTER 800-622-1147, 7AM - 6PM (CST) MONDAY - FRIDAY (IN MEMPHIS, TN, CALL 901-387-3000).
TO ENSURE PROPER CREDIT PLEASE RETURN THE REMITTANCE ADVICE (1ST PAGE OF THIS INVOICE) WITH YOUR PAYMENT
MAIL TO: FEDERAL EXPRESS CORP., P.O. BOX 1140, DEPT. A, MEMPHIS, TN 38101-1140

FE M-0145 5/91

Page 37 of 122

WILDER EXPLORATORY COMMITTEE 1-81 709
 P O BOX 1815
 RICHMOND, VA 23212
 NOV. 10 19 92 44 12/15/92

PAY TO THE Federal Express
 ORDER OF _____ \$ 722.25

Seven Hundred Twenty-two and 25/100 _____ DOLLARS

NationsBank
 National Bank of Virginia, N.A.
 Alexandria, VA

FOR Acct. 1568-6686-5 Final Bill
 #: 056007387; 7922 1933 *0709*



8 1 1 2 8 1 0 7 0 5 0

Deposit: Acct # 1568-6686-5
 Final Payment

*Credica
 JUNE 15 1992
 11:20 AM*

NEXT SCREEN: FINANCIAL/SALES SUMMARY SCREEN
 CUST NUM: SCREEN NUM: KEY: 156866865
 ZIP CODE: NAME: ADDRESS: FIND:
 **** PRESS PF10 TO SEE COMMENTS FOR THIS CUSTOMER ***
 AGING PERIOD: 30 DAYS - LEVEL: D
 CUST NUM: 1568-6686-5 NAME: WILDER FOR PRESIDENT

FIRST SHIP STATUS LAST SHIP LAST PAY AMT / DATE COLL SALES TERR DSO
 11/26/91 ACTIVE 01/21/92 1,781.75 01/24/92 010203-24-08 0

CRED LIM/RATG CASH DATE/REASON LAST 12 MOS PKG/AVG DLY PKG/ADP LAST MON
 CAS 01/21/92 Credit Pending 77 0 0
 BALANCE DUE REVENUE AVG DLY REV ADR LAST MON
 1,242.75 1,884.75 7.36 0.00

CURRENT DUE 31- 60-DAYS 61- 90-DAYS 91-120-DAYS OVER-120-DAYS
 .00 256.25 986.50 .00 .00

UNINV AMT MBI: X OPEN ITEMS: 1,242.75
 .00 RETURNED CHECKS: .00

Break Down:

ENTER INVOICE: SOLAR ITEM INQUIRY SKIP: PAGE: 1 OF 1
 REPRINTS: P BYPASS PYMTS: A/B: CUST NO:

CUSTOMER NAME: WILDER FOR PRESIDENT \$2
 *CASH*01/21/92
 3050 CHAIN BRIDGE RD
 FAIRFAX VA 220302 NO OF ITEMS: 7

INVOICE NO.	DATE	AGE	INV AMT	AMOUNT DUE	CO. LVL	AGT AC	DATE	STATUS
4-563-10434	02/14/92	59	256.25	256.25	0100		02/14/92	OPEN
4-556-33310	02/07/92	66	13.00	13.00	0100		02/06/92	OPEN
4-556-33311	02/07/92	66	13.00	13.00	0100	7	02/07/92	OPEN
4-549-65359	01/31/92	73	268.50	268.50	0100		01/30/92	OPEN
4-549-65360	01/31/92	73	18.00	18.00	0100	7	01/31/92	OPEN
4-543-37940	01/25/92	79	158.50	158.50	0100		01/23/92	OPEN
4-538-03013	01/20/92	84	532.75	515.50	0100		01/24/92	OPEN

*Get copies of invoices from
 Federal Express*

CUSTOMER TOTALS - 1242.75
 ENTER AN S BY THE INV NO TO SEE DETAIL

*less \$500.
 Deposit = \$742.75
 less \$200.50 = \$542.25
 Unallocated Payment*

Final Bill to settle final

Federal Express Account

Acct # 1568-6686-5

603
68-726/68
1982

1-01 April 1 92

WILDER EXPLORATORY COMMITTEE
P.O. BOX 1515
RICHMOND, VA 23212

MT. 211737.4
X3 OFF
8228650-08

Federal Express 03 00885000-1 \$520.50

PAY TO THE ORDER OF
Twenty and 50/100 DOLLARS

NationsBank
NationsBank of Virginia, N.A.
Alexandria, VA
4-558-05856

Ruth McGinnis

056007387 7922 1933 0603 0000002050

INVOICE ~~XXXXXXXXXX~~: NONE.

95070192

08400084
LP NATL BANK
MEMPHIS, TN
FED EX
80-088538

DO NOT STAMP OR SIGN BELOW THIS LINE
OR WRITE ON FINANCIAL INSTITUTION USE

056007387
M/M

0520-0027-B
0520-0027-98
0520-0027-98
0520-0027-98
0520-0027-98
0520-0027-98

0520-0027-B
0520-0027-98
0520-0027-98
0520-0027-98
0520-0027-98

Acct # 1568-6686-5



REMITTANCE ADVICE

Payment Due in 15 Days of Invoice Date

1568-6686-5 4-563-10434 02/14/92
ACCOUNT NUMBER INVOICE NUMBER DATE

BILLING INQUIRIES?
FAX: 800-548-3020

256.25
AMOUNT DUE

5
AIRBILLS

1568668645631043401002562552

PLEASE DO NOT STAPLE OR PAPER CLIP

To ensure proper credit, please return this document with your remittance.

Mail Payment to:

WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030-2834

FEDERAL EXPRESS CORPORATION
P.O. Box 1140
Memphis, TN 38101-1140

QUESTIONS? CALL OUR BILLING SERVICE CENTER, 800-622-1147, 7AM - 8PM (CST) MONDAY - FRIDAY (IN MEMPHIS, TN, CALL 901-387-2000).
TO ENSURE PROPER CREDIT PLEASE RETURN THE REMITTANCE ADVICE (1ST PAGE OF THIS INVOICE) WITH YOUR PAYMENT.
MAIL TO: FEDERAL EXPRESS CORP., P.O. BOX 1140, DEPT. A, MEMPHIS, TN 38101 - 1140

FedEx M-0146 801



BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

SENDER ACTIVITY SUMMARY

INVOICE NO. 4-563-10434 ACCOUNT NO. 1568-6686-5
PAGE 1 OF 2
DATE 02/14/92

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
3494662743	WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	MAME REILEY 8506 WAGON WHEEL RD ALEXANDRIA, VA 22309 AA DELIVERED 01/17/92 10:25 SIGNED: M.REILEY	1/ 25	PRIORITY PKG INVAL ACCT#	65.00 5.00	70.00
560660 1	SHIPPED 01/16/92					
3621519215	WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	MIKE BROWN CONGRESSMAN JIM MORAN 1523 LONGMOUTH WASHINGTON, DC 20510 AA DELIVERED 01/17/92 09:35 SIGNED: R.JOSEPH	1/ 1	PRIORITY PAK	22.50	22.50
59360660 1	SHIPPED 01/16/92					
3621519226	WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	MAME REILEY 8506 WAGON WHEEL RD ALEXANDRIA, VA 22309 AA DELIVERED 01/17/92 10:25 SIGNED: M.REILEY	1/ 25	PRIORITY PKG	65.00	65.00
59360660 1	SHIPPED 01/16/92					

CONTINUED NEXT PAGE

QUESTIONS? CALL OUR BILLING SERVICE CENTER, 800-622-1147, 7AM - 8PM (CST) MONDAY - FRIDAY (IN MEMPHIS, TN, CALL 901-387-2000).
TO ENSURE PROPER CREDIT PLEASE RETURN THE REMITTANCE ADVICE (1ST PAGE OF THIS INVOICE) WITH YOUR PAYMENT.
MAIL TO: FEDERAL EXPRESS CORP., P.O. BOX 1140, DEPT. A, MEMPHIS, TN 38101 - 1140

FedEx M-0146 501



BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

SENDER ACTIVITY SUMMARY

INVOICE NO. 4-563-10434 ACCOUNT NO. 1568-6686-5
PAGE 2 OF 2
DATE 02/14/92

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
3621519230	WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	MAME REILEY 8506 WAGON WHEEL RD ALEXANDRIA, VA 22309 AA DELIVERED 01/17/92 10:25 SIGNED: M.REILEY	1/ 15	PRIORITY PKG	52.50	52.50
59360660 1	SHIPPED 01/16/92					
3621519241	WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	MAME REILEY 8506 WAGON WHEEL RD ALEXANDRIA, VA 22309 AA DELIVERED 01/17/92 10:25 SIGNED: M.REILEY	1/ 10	PRIORITY PKG	46.25	46.25
160660 1	SHIPPED 01/16/92					
SENDER SUBTOTAL					256.25	PAY THIS AMOUNT 256.25
				ATTACHMENT	6	
				Page	42	of 122

Acct # 1568-6686-5



REMITTANCE ADVICE

Payment Due in 15 Days of Invoice Date

1568-6686-5 4-556-33310 02/07/92
 ACCOUNT NUMBER INVOICE NUMBER DATE

BILLING INQUIRIES?
 FAX: 800-548-3828

13.00
 AMOUNT DUE

1
 AIRBILLS

1568668645563331041000130039

PLEASE DO NOT STAPLE OR PAPER CLIP

To ensure proper credit, please return this document with your remittance.

WILDER FOR PRESIDENT
 3050 CHAIN BRIDGE RD
 FAIRFAX, VA 22030-2834

Mail Payment to:
 FEDERAL EXPRESS CORPORATION
 P.O. Box 1140
 Memphis, TN 38101-1140

QUESTIONS? CALL OUR BILLING SERVICE CENTER, 800-822-1147, 7AM - 6PM (CST) MONDAY - FRIDAY IN MEMPHIS, TN. CALL 901-397-2000 TO ENSURE PROPER CREDIT PLEASE RETURN THE REMITTANCE ADVICE (1ST PAGE OF THIS INVOICE) WITH YOUR PAYMENT. MAIL TO: FEDERAL EXPRESS CORP. P.O. BOX 1140, DEPT. A, MEMPHIS TN 38101-1140

FORM 0145 5/91



THIRD PARTY ACTIVITY SUMMARY

BILL TO: WILDER FOR PRESIDENT
 3050 CHAIN BRIDGE RD
 FAIRFAX, VA 22030

INVOICE NO. 4-556-33310 ACCOUNT NO. 1568-6686-5
 PAGE 1 OF 1
 DATE 02/07/92

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
3494662172	MICHAEL EASTMAN WILDER FOR PRESIDENT 120 N MAIN ST CONCORD, NH 03301	RUTH JONES GOVERNOR'S OFFICE STATE HOUSE RICHMOND, VA 23219 AA	1/ NA	PRIORITY LTR DISCOUNT	15.50 -2.50	13.00
68877860	1 DROP OFF 01/16/92					
THIRD PARTY SUBTOTAL			13.00	PAY THIS AMOUNT		13.00

QUESTIONS? CALL OUR BILLING SERVICE CENTER, 800-822-1147, 7AM - 6PM (CST) MONDAY - FRIDAY IN MEMPHIS, TN. CALL 901-397-2000 TO ENSURE PROPER CREDIT PLEASE RETURN THE REMITTANCE ADVICE (1ST PAGE OF THIS INVOICE) WITH YOUR PAYMENT. MAIL TO: FEDERAL EXPRESS CORP. P.O. BOX 1140, DEPT. A, MEMPHIS TN 38101-1140

Form M-0145 5/91

ATTACHMENT 6
 Page 43 of 122

ACCT # 1568-6686-5

05070192



REMITTANCE ADVICE

Payment Due in 15 Days of Invoice Date

1568-6686-5 4-556-33311 02/07/92
ACCOUNT NUMBER INVOICE NUMBER DATE

BILLING INQUIRIES? FAX: 800-548-3028

13.00
AMOUNT DUE

1
AIRBILLS

1568668645563331129000130034

PLEASE DO NOT STAPLE OR PAPER CLIP

To ensure proper credit, please return this document with your remittance.

Mail Payment to:

WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030-2834

FEDERAL EXPRESS CORPORATION
P.O. Box 1140
Memphis, TN 38101-1140

QUESTIONS? CALL OUR BILLING SERVICE CENTER, 800-822-1147, 7AM - 8PM (CST) MONDAY - FRIDAY (IN MEMPHIS, TN, CALL 901-397-2000). TO ENSURE PROPER CREDIT PLEASE RETURN THE REMITTANCE ADVICE (1ST PAGE OF THIS INVOICE) WITH YOUR PAYMENT.

MAIL TO: FEDERAL EXPRESS CORP., P.O. BOX 1140, DEPT. A, MEMPHIS, TN 38101-1140

FedEx M-0148 5/91



BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

SENDER ACTIVITY SUMMARY

INVOICE NO. 4-556-33311 ACCOUNT NO. 1568-6686-5
PAGE 1 OF 2
DATE 02/07/92

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
3418724968	RUTH JONES WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	VICKI WINDHAM FEDERAL EXPRESS STE 4400 2655 THOUSAND OAKS MEMPHIS, TN 38118 AA DELIVERED 01/22/92 08:31 SIGNED: S.MIXON	1/ NA	PRIORITY LTR DISCOUNT	15.50 -2.50	13.00
35792630	1 DROP OFF 01/21/92					
SENDER SUBTOTAL			13.00	PAY THIS AMOUNT		13.00

QUESTIONS? CALL OUR BILLING SERVICE CENTER, 800-822-1147, 7AM - 8PM (CST) MONDAY - FRIDAY (IN MEMPHIS, TN, CALL 901-397-2000). TO ENSURE PROPER CREDIT PLEASE RETURN THE REMITTANCE ADVICE (1ST PAGE OF THIS INVOICE) WITH YOUR PAYMENT.

MAIL TO: FEDERAL EXPRESS CORP., P.O. BOX 1140, DEPT. A, MEMPHIS, TN 38101-1140

FedEx M-0145 5/91



BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

ACTIVITY SUMMARY

INVOICE NO. 4-556-33311 ACCOUNT NO. 1568-6686-5
PAGE 2 OF 2
DATE 02/07/92

FEDERAL EXPRESS IS UNABLE TO BILL THE THIRD PARTY ACCOUNT INDICATED ON THE ORIGINAL AIRBILL. THEREFORE, ACCORDING TO THE TERMS AND CONDITIONS LISTED ON THE BACK OF OUR AIRBILLS AND IN OUR MOST RECENT SERVICE GUIDE, THE CHARGES FOR THIS SHIPMENT MUST BE BILLED TO THE SENDER.

ATTACHMENT 6
Page 45 of 122

QUESTIONS? CALL OUR BILLING SERVICE CENTER, 800-822-1147, 7AM - 8PM (CST) MONDAY - FRIDAY (IN MEMPHIS, TN, CALL 901-397-2000). TO ENSURE PROPER CREDIT PLEASE RETURN THE REMITTANCE ADVICE (1ST PAGE OF THIS INVOICE) WITH YOUR PAYMENT.

Acct # 1568-6686-5

050/0192

no alloc. per FE.



REMITTANCE ADVICE

Payment Due in 15 Days of Invoice Date

1568-6686-5 4-549-65359 01/31/92
ACCOUNT NUMBER INVOICE NUMBER DATE

ADDRESS CORRECTIONS?
CALL: 800-822-1147
7AM - 6PM CST

268.50
AMOUNT DUE

18
AIRBILLS

1568668645496535926002685087

PLEASE DO NOT STAPLE OR PAPER CLIP

To ensure proper credit, please return this document with your remittance.

00069***** CAR-RT SORT ** CR71
WILDER FOR PRESIDENT
\$2
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030-2834

Mail Payment to:

FEDERAL EXPRESS CORPORATION
P.O. Box 1140 Dept A
Memphis, Tn 38101-1140

QUESTIONS? CALL OUR BILLING SERVICE CENTER 800-822-1147, 7 AM - 6 PM (CST) MONDAY-FRIDAY (IN MEMPHIS, TN CALL 901-387-2000).
TO ENSURE PROPER CREDIT PLEASE RETURN THE REMITTANCE ADVICE (1ST PAGE OF THIS INVOICE) WITH YOUR PAYMENT
MAIL TO FEDERAL EXPRESS CORP., P.O. BOX 1140, DEPT. A, MEMPHIS, TN 38101-1140

FedEx M-0145 5-91



BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

SENDER ACTIVITY SUMMARY

INVOICE NO. 4-549-65359 ACCOUNT NO. 1568-6686-5
PAGE 1 OF 2
DATE 01/31/92

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
3244911390	WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	NIEL CATES 166 TREZEBANT BRADFORD, TN 38316 AM DELIVERED 01/20/92 08:48 SIGNED: N. CATES	1/ 3	ECONOMY PKG DISCOUNT	15.00 -2.50	12.50
06887786	1 DROP OFF 01/16/92					
SENDER SUBTOTAL			12.50	CONTINUED NEXT PAGE		

QUESTIONS? CALL OUR BILLING SERVICE CENTER 800-822-1147, 7 AM - 6 PM (CST) MONDAY-FRIDAY (IN MEMPHIS, TN CALL 901-387-2000).
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BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

RECIPIENT ACTIVITY SUMMARY

INVOICE NO. 4-549-65359 ACCOUNT NO. 1568-6686-5
PAGE 2 OF 2
DATE 01/31/92

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
3418725074	RUTH JONES GOVERNOR'S OFFICE STATE CAPITOL RICHMOND, VA 23219	SARAH CALLAHAN WILDER FOR PRESIDENT STE 404 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030 AA DELIVERED 01/16/92 10:24 SIGNED: S. CALAHAN	1/ NA	PRIORITY LTR DISCOUNT	15.00 -2.50	13.00
03385970	1 DROP OFF 01/15/92					
RECIPIENT SUBTOTAL			13.00	CONTINUED NEXT PAGE		

QUESTIONS? CALL OUR BILLING SERVICE CENTER 800-822-1147, 7 AM - 6 PM (CST) MONDAY-FRIDAY (IN MEMPHIS, TN CALL 901-387-2000).
TO ENSURE PROPER CREDIT PLEASE RETURN THE REMITTANCE ADVICE (1ST PAGE OF THIS INVOICE) WITH YOUR PAYMENT
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ATTACHMENT 6
Page 47 of 122

BILL TO: WILDER FOR PRESIDENT
 3050 CHAIN BRIDGE RD
 FAIRFAX, VA 22030

THIRD PARTY ACTIVITY SUMMARY

PAGE 3 OF 3
 DATE 01/31/92
 INVOICE NO. 4-549-65359 ACCOUNT NO. 1568-6686-6

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
718562501	BILL KEOUGH GOVERNORS OFFICE STATE CAPITOL RICHMOND, VA 23219	THE HON RILEY ANDERSON LEGISLATIVE SEC OF STATE LEGISLATIVE BLDG OLYMPIA WA 98504 AA DELIVERED 01/14/92 10:23 SIGNED: LUPJOHN	1/ NA	PRIORITY LTR	15.50	15.50
3371270	1 SHIPPED 01/13/92					
7941808066	BILL KEOUGH GOVERNORS OFFICE STATE CAPITOL RICHMOND, VA 23219	THE HON FOX MCKEITHEN SEC OF STATE STATE OF LOUISIA 3851 ESSEN LANE STATE ARCHIVE BATON ROUGE LA 70809 AA DELIVERED 01/14/92 09:21 SIGNED: B.BESSIX	1/ NA	PRIORITY LTR	15.50	15.50
03371270	1 SHIPPED 01/13/92					
7941808070	BILL KEOUGH GOVERNORS OFFICE STATE CAPITOL RICHMOND, VA 23219	MS RHODA STRAUS UTAH DEMOCRATIC PARTY 453 WEST BEARCAT SALT LAKE CITY UT 84115 AA DELIVERED 01/14/92 08:53 SIGNED: L STRAUS	1/ NA	PRIORITY LTR	15.50	15.50
03371270	1 SHIPPED 01/13/92					

CONTINUED NEXT PAGE

QUESTIONS? CALL OUR BILLING SERVICE CENTER 800-622-1147 7 AM - 6 PM (CST) MONDAY-FRIDAY (IN MEMPHIS, TN CALL 901-387-2000)
 TO ENSURE PROPER CREDIT PLEASE RETURN THE REMITTANCE ADVICE (1ST PAGE OF THIS INVOICE) WITH YOUR PAYMENT
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BILL TO: WILDER FOR PRESIDENT
 3050 CHAIN BRIDGE RD
 FAIRFAX, VA 22030

THIRD PARTY ACTIVITY SUMMARY

PAGE 4 OF 4
 DATE 01/31/92
 INVOICE NO. 4-549-65359 ACCOUNT NO. 1568-6686-6

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
7941808081	BILL KEOUGH GOVERNORS OFFICE STATE CAPITOL RICHMOND, VA 23219	THE HON JOAN ANDERSON GROHE MINNESOTA SEC OF STATE 180 STATE OFFICE BLDG ST. PAUL MN 55155 AA DELIVERED 01/14/92 09:59 SIGNED: C.EVANS	1/ NA	PRIORITY LTR	15.50	15.50
03371270	1 SHIPPED 01/13/92					
7941803092	BILL KEOUGH GOVERNORS OFFICE STATE CAPITOL RICHMOND, VA 23219	THE HON NATALIE MEYERS COLORADO SEC OF STATE STE 200 1560 BROADWAY DENVER CO 80203 AA DELIVERED 01/14/92 08:35 SIGNED: M.LINDSEY	1/ NA	PRIORITY LTR	15.50	15.50
71270	1 SHIPPED 01/13/92					
7941808103	BILL KEOUGH GOVERNORS OFFICE STATE CAPITOL RICHMOND, VA 23219	THE HON ALAN BEERMAN NEBRASKA SEC OF STATE STE 230 STATE CAPITOL LINCOLN NE 68509 AA DELIVERED 01/14/92 09:21 SIGNED: J.BERRON	1/ NA	PRIORITY LTR	15.50	15.50
03371270	1 SHIPPED 01/13/92					

CONTINUED NEXT PAGE

QUESTIONS? CALL OUR BILLING SERVICE CENTER 800-622-1147 7 AM - 6 PM (CST) MONDAY-FRIDAY (IN MEMPHIS, TN CALL 901-387-2000)
 TO ENSURE PROPER CREDIT PLEASE RETURN THE REMITTANCE ADVICE (1ST PAGE OF THIS INVOICE) WITH YOUR PAYMENT
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BILL TO: WILDER FOR PRESIDENT
 3050 CHAIN BRIDGE RD
 FAIRFAX, VA 22030

THIRD PARTY ACTIVITY SUMMARY

PAGE 5 OF 5
 DATE 01/31/92
 INVOICE NO. 4-549-65359 ACCOUNT NO. 1568-6686-6

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
7941808114	BILL KEOUGH GOVERNORS OFFICE STATE CAPITOL RICHMOND, VA 23219	THE HON PHIL KEISLING OREGON SEC OF STATE RM 141 STATE CAPITOL BUILDING SALEM OR 97310 AA DELIVERED 01/14/92 09:35 SIGNED: S.SCHAEFER	1/ NA	PRIORITY LTR	15.50	15.50
03371270	1 SHIPPED 01/13/92					
7941808125	BILL KEOUGH GOVERNORS OFFICE STATE CAPITOL RICHMOND, VA 23219	THE HON BRYANT HILSAPS TENNESSEE SEC OF STATE STATE CAPITOL NASHVILLE TN 37243 AA DELIVERED 01/14/92 09:41 SIGNED: C.RICHMOND	1/ NA	PRIORITY LTR	15.50	15.50
03371270	1 SHIPPED 01/13/92					
7941808136	BILL KEOUGH GOVERNORS OFFICE STATE CAPITOL RICHMOND, VA 23219	THE HON KATHLEEN CONNELL RHOODE ISLAND SEC OF STATE STATE HOUSE PROVIDENCE RI 02903 AA DELIVERED 01/14/92 09:57 SIGNED: M.LORIA	1/ NA	PRIORITY LTR	15.50	15.50
71270	1 SHIPPED 01/13/92					

CONTINUED NEXT PAGE

QUESTIONS? CALL OUR BILLING SERVICE CENTER 800-622-1147 7 AM - 6 PM (CST) MONDAY-FRIDAY (IN MEMPHIS, TN CALL 901-387-2000)
 TO ENSURE PROPER CREDIT PLEASE RETURN THE REMITTANCE ADVICE (1ST PAGE OF THIS INVOICE) WITH YOUR PAYMENT
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ATTACHMENT 6

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BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

THIRD PARTY ACTIVITY SUMMARY

PAGE 6 OF 6
DATE 01/31/92
INVOICE NO. 4-549-65359 ACCOUNT NO. 1568-6686

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
7941602140	BILL KEOUGH GOVERNORS OFFICE STATE CAPITOL RICHMOND, VA 23219	MELCIE JACKSON 1911 THE REPUBLICAN PARTY 100 1509 NORTH CENTRAL PHOENIX, AZ 85004 AA DELIVERED 01/14/92 09:58 SIGNED: V. JARAMILLO	1/ NA	PRIORITY LTR	15.50	
03371270	1 SHIPPED 01/13/92					
7941808151	BILL KEOUGH GOVERNORS OFFICE STATE CAPITOL RICHMOND, VA 23219	MR JEFF LANIER STATE OF GEORGIA DIRECTOR OF STATE CAPITOL ATLANTA, GA 30334 AA DELIVERED 01/14/92 09:29 SIGNED: M. MOSER	1/ NA	PRIORITY LTR	15.50	
03371270	1 SHIPPED 01/13/92					15.50
7185822490	A RUSSELL GOVERNORS OFFICE STATE CAPITOL RICHMOND, VA 23219	MARGARET JOHNSTON DELL COMPUTER CORPORATION 9505 ARBORETUM BOULEVARD AUSTIN, TX 78759 AA DELIVERED 01/15/92 09:05 SIGNED: R. JENETT	1/ NA	PRIORITY LTR	15.50	
03370975	1 SHIPPED 01/14/92					15.50

CONTINUED NEXT PAGE

QUESTIONS? CALL OUR BILLING SERVICE CENTER 800-622-1147, 7 AM - 6 PM (CST) MONDAY-FRIDAY (IN MEMPHIS, TN, CALL 901-397-2000)
TO ENSURE PROPER CREDIT PLEASE RETURN THE REMITTANCE ADVICE (1ST PAGE OF THIS INVOICE) WITH YOUR PAYMENT
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BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

THIRD PARTY ACTIVITY SUMMARY

PAGE 7 OF 7
DATE 01/31/92
INVOICE NO. 4-549-65359 ACCOUNT NO. 1568-6686

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
3418724982	RUTH JONES GOVERNOR'S OFFICE STATE CAPITOL RICHMOND, VA 23219	NAME REILLY CONGRESSMAN MORAN'S OFFICE 1525 LONGWORTH HOUSE OFFICE B WASHINGTON, DC 20515 AA DELIVERED 01/16/92 09:34 SIGNED: R. JOSEPH	1/ NA	PRIORITY LTR DISCOUNT	15.50 -2.50	
03385970	1 DROP OFF 01/15/92					13.00
3418725004	RUTH JONES GOVERNOR'S OFFICE STATE CAPITOL RICHMOND, VA 23219	MIKE EASTMAN WILDER FOR PRESIDENT 120 NORTH MAIN ST COCORON, NH 03301 AA DELIVERED 01/16/92 09:08 SIGNED: M. REILLY	1/ NA	PRIORITY LTR DISCOUNT	15.50 -2.50	
03385970	1 DROP OFF 01/15/92					13.00
3418725085	RUTH JONES GOVERNOR'S OFFICE STATE CAPITOL RICHMOND, VA 23219	BENJAMIN BROWN C/O L E D STE 407 1730 M ST N W WASHINGTON, DC 20036 AA DELIVERED 01/17/92 10:14 SIGNED: E. DREH	1/ NA	PRIORITY LTR	15.50	
03385955	1 SHIPPED 01/16/92					15.50

CONTINUED NEXT PAGE

QUESTIONS? CALL OUR BILLING SERVICE CENTER 800-622-1147, 7 AM - 6 PM (CST) MONDAY-FRIDAY (IN MEMPHIS, TN, CALL 901-397-2000)
TO ENSURE PROPER CREDIT PLEASE RETURN THE REMITTANCE ADVICE (1ST PAGE OF THIS INVOICE) WITH YOUR PAYMENT
MAIL TO: FEDERAL EXPRESS CORP., P.O. BOX 1140, DEPT. A, MEMPHIS, TN 38101-1140

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BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

THIRD PARTY ACTIVITY SUMMARY

PAGE 8 OF 8
DATE 01/31/92
INVOICE NO. 4-549-65359 ACCOUNT NO. 1568-6686

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
1922629365	RUTH JONES GOVERNORS OFFICE STATE CAPITOL RICHMOND, VA 23219	LINDA HATCH 902-A FIELDFOOD DRIVE AUSTIN, TX 78758 AA DELIVERED 01/20/92 09:47 SIGNED: L. HATCH	1/ NA	PRIORITY LTR	15.50	
03385513	1 SHIPPED 01/17/92					15.50
THIRD PARTY SUBTOTAL			243.00	PAY THIS AMOUNT		263.00

QUESTIONS? CALL OUR BILLING SERVICE CENTER 800-622-1147, 7 AM - 6 PM (CST) MONDAY-FRIDAY (IN MEMPHIS, TN, CALL 901-397-2000)
TO ENSURE PROPER CREDIT PLEASE RETURN THE REMITTANCE ADVICE (1ST PAGE OF THIS INVOICE) WITH YOUR PAYMENT
MAIL TO: FEDERAL EXPRESS CORP., P.O. BOX 1140, DEPT. A, MEMPHIS, TN 38101-1140

FedEx M-0145 5/91

ATTACHMENT 6
Page 49 of 127 15



BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

ACTIVITY SUMMARY

PAGE 9 OF 9
DATE 01/31/92
INVOICE NO. 4-549-65359 ACCOUNT NO. 1568-6666-5

FEDERAL EXPRESS PACKAGE DELIVERY STATUS CODES:
08 RECIPIENT NOT IN/BUSINESS CLOSED

QUESTIONS? CALL OUR BILLING SERVICE CENTER 800-622-1147 7 AM - 6 PM (CST) MONDAY-FRIDAY IN MEMPHIS TN CALL 901-872-2211
TO ENSURE PROPER CREDIT PLEASE RETURN THE REMITTANCE ADVICE 1ST PAGE OF THIS INVOICE WITH YOUR PAYMENT.
MAIL TO FEDERAL EXPRESS CORP P.O. BOX 1140 DEPT A MEMPHIS TN 38101-1140

Page: M-274E 591



REMITTANCE ADVICE

Payment Due in 15 Days of Invoice Date

1563-6686-5 4-549-65360 01/31/92
ACCOUNT NUMBER INVOICE NUMBER DATE

ADDRESS CORRECTED?
CALL: 800-622-1147
7AM - 6PM CST

18.00
AMOUNT DUE

1
AIRBILLS

1568668645496536009000180025

PLEASE DO NOT STAPLE OR PAPER CLIP

00069XXXXXXXXXX CAR-RT SORT ** CR71
WILDER FOR PRESIDENT
\$2
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030-2834

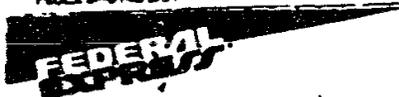
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Mail Payment to:

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P.O. Box 1140 Dept A
Memphis, TN 38101-1140

QUESTIONS? CALL OUR BILLING SERVICE CENTER, 800-622-1147, 7 AM - 6 PM (CST) MONDAY-FRIDAY (IN MEMPHIS TN CALL 901-397-2000).
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BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

SENDER ACTIVITY SUMMARY

PAGE 1 OF 1
DATE 01/31/92
INVOICE NO. 4-549-65360 ACCOUNT NO. 1568-6686-5

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
1922629321*	BILL KEOUGH WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	ANITA LOMLAN-PERRELL THE GORMAN GROUP 2015 MASSACHUSETTS AVE NW WASHINGTON, DC 20036 AA DELIVERED 01/22/92 09:56 SIGNED: M. HERNANDEZ	1/ NA	PRIORITY LTR DISCOUNT ACCT # CORR	15.50 -2.50 5.00	18.00
83579263 1	DROP OFF 01/21/92					
SENDER SUBTOTAL			18.00	PAY THIS AMOUNT		18.00

QUESTIONS? CALL OUR BILLING SERVICE CENTER, 800-622-1147, 7 AM - 6 PM (CST) MONDAY-FRIDAY (IN MEMPHIS TN CALL 901-397-2000).
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BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

ACTIVITY SUMMARY

PAGE 2 OF 2
DATE 01/31/92
INVOICE NO. 4-549-65360 ACCOUNT NO. 1568-6686-5

* FEDERAL EXPRESS IS UNABLE TO BILL THE THIRD PARTY ACCOUNT INDICATED ON THE ORIGINAL AIRBILL.
THEREFORE, ACCORDING TO THE TERMS AND CONDITIONS LISTED ON THE BACK OF OUR AIRBILLS AND IN
OUR MOST RECENT SERVICE GUIDE, THE CHARGES FOR THIS SHIPMENT MUST BE BILLED TO THE SENDER

QUESTIONS? CALL OUR BILLING SERVICE CENTER, 800-622-1147, 7 AM - 6 PM (CST) MONDAY-FRIDAY (IN MEMPHIS TN CALL 901-397-2000).
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ATTACHMENT 6
of 122

Acct # 1568-6686-5

05070192

NO ATIOC. per F.E

Acct # 1568-6686-5

9577012900

REMITTANCE ADVICE

Payment Due in 15 Days of Invoice Date

1568-6686-5 4-543-37940 01/25/92
ACCOUNT NUMBER INVOICE NUMBER DATE

BILLING INQUIRIES
FAX: 800-548-3020

158.50
AMOUNT DUE

11
AIRBILLS

1568668645433794005001585010

PLEASE DO NOT STAPLE OR PAPER CLIP

To ensure proper credit, please return this document with your remittance.

Mail Payment to:

WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030-2834

FEDERAL EXPRESS CORPORATION
P.O. Box 1140
Memphis, TN 38101-1140

QUESTIONS? CALL OUR BILLING SERVICE CENTER, 800-822-1147, 7AM - 6PM (CST) MONDAY - FRIDAY (IN MEMPHIS, TN, CALL 901-387-2000).
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Form M-0148 5/91



BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

SENDER ACTIVITY SUMMARY

INVOICE NO. 4-543-37940 ACCOUNT NO. 1568-6686-
PAGE 1 OF 1
DATE 01/25/92

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
3336864653	SCOTT BATES WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	RECEPTIONIST THE ADVOCATE 8922 HOLLYWOOD BLVD LOS ANGELES, CA 90028 AA DELIVERED 01/09/92 10:02 SIGNED: H. MORSEY	1/ NA	STANDARD LTR	11.50	
29002200 1	SHIPPED 01/08/92					11.50
3171108371	SARAH CALLAHAN WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	CAROL DAVIDSON OFFICE OF GOVERNOR WILDER STATE CAPITOL OF VIRGINIA RICHMOND, VA 23219 AA DELIVERED 01/17/92 09:07 SIGNED: G. NICKEY	1/ 1	PRIORITY PAK	22.50	
29027140 1	SHIPPED 01/16/92					22.50
3171108382	HERMAN STEVENSON WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	TROOPER D F PARRIES VIRGINIA STATE POLICE THE STATE CAPITOL RICHMOND, VA 23219 AA DELIVERED 01/20/92 11:31 SIGNED: W. HAIDEN	1/ 4	STANDARD BOX	18.50	
29035540 1	SHIPPED 01/17/92					18.50
SENDER SUBTOTAL			52.50	CONTINUED NEXT PAGE		

QUESTIONS? CALL OUR BILLING SERVICE CENTER, 800-822-1147, 7AM - 6PM (CST) MONDAY - FRIDAY (IN MEMPHIS, TN, CALL 901-387-2000).
TO ENSURE PROPER CREDIT PLEASE RETURN THE REMITTANCE ADVICE (1ST PAGE OF THIS INVOICE) WITH YOUR PAYMENT.
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Form M-0148 5/91



BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

RECIPIENT ACTIVITY SUMMARY

INVOICE NO. 4-543-37940 ACCOUNT NO. 1568-6686-
PAGE 2 OF 2
DATE 01/25/92

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
3096602040	RUTH JONES GOVERNOR'S OFFICE STATE CAPITOL RICHMOND, VA 23219	INDIA ADEAS WILDER FOR PRESIDENT ST 404 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030 AA DELIVERED 01/03/92 10:23 SIGNED: A. SMITH	1/ NA	PRIORITY LTR DISCOUNT	15.50 -2.50	
71671720 1	DROP OFF 01/02/92					13.00
3096602062	RUTH JONES GOVERNOR'S OFFICE STATE CAPITOL RICHMOND, VA 23219	TFN 8618 WESTWOOD CENTER DR VIENNA, VA 22182 AA DELIVERED 01/03/92 09:22 SIGNED: J. REYNOLDS	1/ NA	PRIORITY LTR DISCOUNT	15.50 -2.50	
71671720 1	DROP OFF 01/02/92					13.00
31896441	CECILIA WHITE NEW YORK TIMES SYNDICATION SLS 130 FIFTH AVENUE 9TH FLR NEW YORK, NY 10011	LYSA KATZ WILDER FOR PRESIDENT PRESS OF C/O STATE CAPITOL 3RD-FL RICHMOND, VA 23219 AA DELIVERED 01/16/92 11:52 SIGNED: L. GOESCHER	1/ NA	STANDARD LTR DISCOUNT	11.50 -2.50	
07225130 1	DROP OFF 01/15/92					9.00
RECIPIENT SUBTOTAL			35.00	CONTINUED NEXT PAGE		

ATTACHMENT 6

QUESTIONS? CALL OUR BILLING SERVICE CENTER, 800-822-1147, 7AM - 6PM (CST) MONDAY - FRIDAY (IN MEMPHIS, TN, CALL 901-387-2000).
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54 of 122



BILL TO: WILDER FOR PRESIDENT
3650 CHAIN BRIDGE RD
FAIRFAX, VA 22030

THIRD PARTY ACTIVITY SUMMARY

PAGE 3 OF 3
DATE 01/25/92
INVOICE NO. 4-543-37940 ACCOUNT NO. 1568-6686-5

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
7185822453	COURTNEY O'SULLIVAN GOVERNORS OFFICE STATE CAPITOL RICHMOND, VA 23219	HEATHER SHAFF NETWORK PUBLICATIONS 100 MAIN ST NASHUA NH 03060 AA DELIVERED 01/09/92 09:47 SIGNED: S. RYDER	1/ NA	STANDARD LTR DISCOUNT	11.50 -2.50	
71553420	1 DROP OFF 01/08/92					0
7631169630	ROBERT B WEITRAUB 401 E 74TH 7C NEW YORK, NY 10021 84	IRIS BAEZ OFFICE OF ASSEMBLYMAN STEPHEN 177 DREISER LOOP DREISER LOOP BRONX NY 10475 AA DELIVERED 01/09/92 09:48 SIGNED: G. RUBIN	1/ NA	PRIORITY LTR	15.50	
34038500	1 SHIPPED 01/08/92					15.50
3418725041	BILL KEOUGH GOVERNOR'S OFFICE STATE CAPITOL RICHMOND, VA 23219	THE HON DICK MOLFUS MISSISSIPPI SEC OF STATE 481 MISSISSIPPI ST JACKSON, MS 39201 AA DELIVERED 01/13/92 08:18 SIGNED: H. QUINN	1/ NA	PRIORITY LTR	15.50	
33717710	1 SHIPPED 01/10/92					15.50

CONTINUED NEXT PAGE

QUESTIONS? CALL OUR BILLING SERVICE CENTER, 800-822-1147, 7AM - 8PM (CST) MONDAY - FRIDAY (IN MEMPHIS, TN, CALL 901-397-2000).
TO ENSURE PROPER CREDIT PLEASE RETURN THE REMITTANCE ADVICE (1ST PAGE OF THIS INVOICE) WITH YOUR PAYMENT.
MAIL TO: FEDERAL EXPRESS CORP., P.O. BOX 1140, DEPT. A, MEMPHIS, TN 38101 - 1140

FedEx M-0145 5/01



BILL TO: WILDER FOR PRESIDENT
3650 CHAIN BRIDGE RD
FAIRFAX, VA 22030

THIRD PARTY ACTIVITY SUMMARY

PAGE 4 OF 4
DATE 01/25/92
INVOICE NO. 4-543-37940 ACCOUNT NO. 1568-6686-5

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
7185822512	BILL KEOUGH GOVERNORS OFFICE STATE CAPITOL RICHMOND, VA 23219	THE HON RICHARD J AUSTIN MICHIGAN SEC OF STATE ATT G H 208 N CAPITOL 4TH FL MUTUAL B LANSING, MI 48933 AA DELIVERED 01/13/92 09:28 SIGNED: L. SHERIDAN	1/ NA	PRIORITY LTR DISCOUNT	15.50 -2.50	
33726000	1 DROP OFF 01/10/92					13.00
7185822523	BILL KEOUGH GOVERNORS OFFICE STATE CAPITOL RICHMOND, VA 23219	THE HON MICHAEL J CONNOLLY MASSACHUSETTS SEC OF STATE AT 1 ASHBURTON PL 1705 BOSTON, MA 02108 AA DELIVERED 01/13/92 09:46 SIGNED: C. BROWN	1/ NA	PRIORITY LTR DISCOUNT ADDRESS CORR	15.50 -2.50 5.00	
33726000	1 DROP OFF 01/10/92					00
THIRD PARTY SUBTOTAL			71.00	PAY THIS AMOUNT		158.50

QUESTIONS? CALL OUR BILLING SERVICE CENTER, 800-822-1147, 7AM - 8PM (CST) MONDAY - FRIDAY (IN MEMPHIS, TN, CALL 901-397-2000).
TO ENSURE PROPER CREDIT PLEASE RETURN THE REMITTANCE ADVICE (1ST PAGE OF THIS INVOICE) WITH YOUR PAYMENT.
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BILL TO: WILDER FOR PRESIDENT
3650 CHAIN BRIDGE RD
FAIRFAX, VA 22030

ACTIVITY SUMMARY

PAGE 5 OF 6
DATE 01/25/92
INVOICE NO. 4-543-37940 ACCOUNT NO. 1568-6686-5

* FEDEX HAS AUDITED THIS AIRBILL FOR CORRECT PIECES, WEIGHT, AND SERVICE. ANY CHANGES MADE ARE REFLECTED IN THE INVOICE AMOUNT.

QUESTIONS? CALL OUR BILLING SERVICE CENTER, 800-822-1147, 7AM - 8PM (CST) MONDAY - FRIDAY (IN MEMPHIS, TN, CALL 901-397-2000).
TO ENSURE PROPER CREDIT PLEASE RETURN THE REMITTANCE ADVICE (1ST PAGE OF THIS INVOICE) WITH YOUR PAYMENT.
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FedEx M-0145 5/01

ATTACHMENT
Page 56 of 122

FEDERAL EXPRESS

REMITTANCE ADVICE

PAYMENT DUE IN 15 DAYS

1568-6886-5 4-538-03013 01/20/92
ACCOUNT NUMBER INVOICE NUMBER DATE

ADDRESS CORRECTIONS?
CALL: 800-622-1147
7AM - 6PM CST

532.75

34

AMOUNT DUE

AIRBILLS

1568688645380301334005327549

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TO INSURE: FOR CREDIT, PLEASE RETURN
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WILDER FOR PRESIDENT

3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030-2834

MAIL PAY, ETC.
FEDERAL EXPRESS
PO BOX 1140 DEPT 2
MEMPHIS, TN 38101-1140

FEDERAL EXPRESS

BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

SENDER ACTIVITY SUMMARY

PAGE 1 OF 11

DATE 01/20/92

INVOICE NO. 4-538-03013 ACCOUNT NO. 1568-6886-5

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
3519249322	CAREY COLE/NAME BEILEY WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	JEFF WARD FAIRFAX CITY DEMOCRATIC 7245 ARLINGTON BLVD FALLS CHURCH, VA 22042 AA DELIVERED 12/20/91 09:57 SIGNED: J. WARD	1/ 8	PRIORITY PKG INVAL ACCTD	48.75 5.00	45.75
75943642	1 SHIPPED 12/19/91					
3494662102	NAME BEILEY WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	BRUCE AYMER FINANCE - 243 CANNON OFFICE BLDG WASHINGTON DC 20515 AA DELIVERED 01/07/92 09:58 SIGNED: P. PRICE	1/ NA	PRIORITY LTR DISCOUNT INVAL ACCTD	15.50 -2.50 5.00	18.00
4886692	1 DROP OFF 01/03/92					
3625519523	JOHN BRAIZELL WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	DEDDIE PARKS S R WOODBACK & ASSOC STE 850 200 S BROAD ST THE BELLVIEW PHILADELPHIA, PA 19102 AA DELIVERED 01/06/92 08:39 SIGNED: S. RUMWELT	1/ NA	PRIORITY LTR	15.50	15.50
92898904	1 SHIPPED 01/03/92					

CONTINUED NEXT PAGE

FEDERAL EXPRESS

BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

SENDER ACTIVITY SUMMARY

PAGE 2 OF 11

DATE 01/20/92

INVOICE NO. 4-538-03013 ACCOUNT NO. 1568-6886-5

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
3338866676	SARAH CALLAHAN WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	CAROL DAVIDSON OFFICE OF GOVERNOR WILDER 3 STATE CAPITOL OF VIRGINIA RICHMOND, VA 23219 AA DELIVERED 01/08/92 11:38 SIGNED: C. SULLIVAN	1/ NA	STANDARD LTR	11.50	11.50
92899192	1 SHIPPED 01/07/92					
3338866620	INDIA & TONY WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	BARREN HUMPHREY 4411 DULUTH WY DENVER, CO 80239 AA DELIVERED 01/08/92 14:33 SIGNED: D. HUMPHREY	1/ 1	STANDARD BOX	15.50	15.50
92899192	1 SHIPPED 01/07/92					
3338866631	BRIAN WOOLFOLK WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	DR CAROLL HARDY OFFICE OF MULTI CULTURAL AFFA JAMES OLIVER HALL RM 209 WILLIAMSBURG, VA 23185 AA DELIVERED 01/08/92 11:43 SIGNED: J. CARTER	1/ 10	PRIORITY PKG	46.25	46.25
92899170	1 SHIPPED 01/07/92					

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ATTACHMENT

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FEDERAL EXPRESS

BILL TO: WILDER FOR PRESIDENT

SENDER ACTIVITY SUMMARY

PAGE 3 OF 11

FEDERAL EXPRESS

BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

THIRD PARTY ACTIVITY SUMMARY

INVOICE NO. 4-538-03013 ACCOUNT NO. 1548-6886-5
PAGE 6 OF 11
DATE 01/20/92

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
3494662091 75942416	MICHAEL EASTMAN WILDER FOR PRESIDENT 120 W MAIN ST CONCORD, NH 03301 DROPOFF 12/27/91	CLEMOND AVIDSON GOVERNOR WILDER'S OFFICE CAPITAL BLDG RICHMOND, VA 23219 AA DELIVERED 12/30/91 12:30 SIGNED: F. SORRENTINO	1/ NA	STANDARD LTR DISCOUNT	11.50 -2.50	9.00
7185822394 87166763	BILL KEOUGH GOVERNORS OFFICE STATE CAPITOL RICHMOND, VA 23219 DROPOFF 12/30/91	RE KNOXA STRUHS NYAN DEMOCRATIC PARTY 453 WEST BEARCAT SALT LAKE CITY, UT 84115 AA DELIVERED 12/31/91 06:25 SIGNED: P. SEVENSEN	1/ NA	PRIORITY LTR DISCOUNT	15.50 -2.50	13.00
7185822403 87166763	BILL KEOUGH GOVERNORS OFFICE STATE CAPITOL RICHMOND, VA 23219 DROPOFF 12/30/91	THE HON JOAN ANDERSON GROSS MINNESOTA SEC OF STATE 100 STATE OFFICE BUILDING ST. PAUL, MN 55155 AA DELIVERED 12/31/91 09:14 SIGNED: C. EVANS	1/ NA	PRIORITY LTR DISCOUNT	23.50 -2.50	13.00

CONTINUED NEXT PAGE

FEDERAL EXPRESS

BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

THIRD PARTY ACTIVITY SUMMARY

INVOICE NO. 4-538-03013 ACCOUNT NO. 1548-6886-5
PAGE 7 OF 11
DATE 01/20/92

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
7185822456 87166763	BILL KEOUGH GOVERNORS OFFICE STATE CAPITOL RICHMOND, VA 23219 DROPOFF 12/30/91	BOB SLASLE TEXAS DEMOCRATIC PARTY STE 20 815 WAREDS S ST AUSTIN, TX 78701 AA DELIVERED 12/31/91 09:04 SIGNED: E. THOMPSON	1/ NA	PRIORITY LTR DISCOUNT	15.50 -2.50	13.00
7185822420 87166763	BILL KEOUGH GOVERNORS OFFICE STATE CAPITOL RICHMOND, VA 23219 DROPOFF 12/30/91	THE HON NATALIE REYERS COLORADO SEC OF STATE STE 200 1540 BROADWAY DENVER, CO 80203 AA DELIVERED 12/31/91 09:35 SIGNED: M. LINDSEY	1/ NA	PRIORITY LTR DISCOUNT	15.50 -2.50	13.00
7185822431 87166752	BILL KEOUGH GOVERNORS OFFICE STATE CAPITOL RICHMOND, VA 23219 DROPOFF 12/31/91	THE HON JOAN ANDERSON GROSS MINNESOTA SECRETARY OF STATE 100 STATE OFFICE BUILDING ST. PAUL, MN 55155 AA DELIVERED 01/02/92 09:19 SIGNED: S. RUAN	1/ NA	PRIORITY LTR	15.50	15.50

CONTINUED NEXT PAGE

FEDERAL EXPRESS

BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

THIRD PARTY ACTIVITY SUMMARY

INVOICE NO. 4-538-03013 ACCOUNT NO. 1548-6886-5
PAGE 8 OF 11
DATE 01/20/92

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
7185822442 87166752	BILL KEOUGH GOVERNORS OFFICE STATE CAPITOL RICHMOND, VA 23219 DROPOFF 12/31/91	THE HON NATALIE REYERS COLORADO SECRETARY OF STATE 1540 BROADWAY STE 200 DENVER, CO 80203 AA DELIVERED 01/02/92 09:30 SIGNED: M. LINDSEY	1/ NA	PRIORITY LTR	15.50	15.50
7631173001 ROBERT B WEI TRAUD 96367331	ROBERT B WEINTRAUD 401 E 74TH ST 7C NEW YORK, NY 10021 DROPOFF 12/31/91	RICHARD HURLEY 662 HAWTHORNE ST BROOKLYN, NY 11203 AA DELIVERED 01/02/92 12:28 SIGNED: E. WALKER	1/ 2	PRIORITY PAK DISCOUNT	24.25 -2.50	21.75
7185822593 87166122	BILL KEOUGH GOVERNORS OFFICE STATE CAPITOL RICHMOND, VA 23219 DROPOFF 01/03/92	MS MELODIE JACKSON ARIZONA DEMOCRATIC PARTY 100 1309 N CENTRAL PHOENIX, AZ 85004 AA DELIVERED 01/06/92 09:51 SIGNED: V. JARAMILLO	1/ NA	PRIORITY LTR	15.50	15.50

CONTINUED NEXT PAGE

ATTACHMENT
Page 57 of 123

FEDERAL EXPRESS

BILL TO: WILDER FOR PRESIDENT

THIRD PARTY ACTIVITY SUMMARY

PAGE 9 OF 11
DATE 01/20/92

FEDERAL EXPRESS

REMITTANCE ADVICE

PAYMENT DUE IN 15 DAYS

1529-5072-1 6-401-51634 08/23/91
ACCOUNT NUMBER INVOICE NUMBER DATE

ADDRESS CORRECTIONS?
CALL: 800-222-1117
7AM - 6PM CST

21.75
AMOUNT DUE

1
ATTENTION

1529507244015163415000217587

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10050..... 5-DIGIT 22313
WILDER FOR PRESIDENT
MELISSA BLACK \$2
PO BOX 25033
ALEXANDRIA, VA 22313-5033

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FEDERAL EXPRESS CORP
PO BOX 1140 DEPT A
MEMPHIS, TN 38101-1140

FEDERAL EXPRESS

BILL TO: WILDER FOR PRESIDENT
201 N UNION ST STE 300
ALEXANDRIA, VA 22314

SENDER ACTIVITY SUMMARY

PAGE 1 OF 1
DATE 08/23/91
INVOICE NO. 6-401-51634 ACCOUNT NO. 1529-5072-1

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
6728970850	NICHOLAS PERKINS WILDER FOR PRESIDENT 201 N UNION ST STE 300 ALEXANDRIA, VA 22314	MARK WARNER VIRGINIA DEMOCRATIC PARTY 1001 E BROAD ST STE LL25 RICHMOND, VA 23219 AA DELIVERED 08/14/91 09:13 SIGNED: L. TEVERS	1/ 2	PRIORITY PAK DISCOUNT	24.25 -2.50	
75755741	1 DROP OFF 08/15/91					21.75
SENDER SUBTOTAL			21.75	PAY THIS AMOUNT		21.75

FEDERAL EXPRESS



REMITTANCE ADVICE

PAYMENT DUE IN 15 DAYS

1529-5072-1 4-408-00444 08/30/91
ACCOUNT NUMBER INVOICE NUMBER DATE

ADDRESS CORRECTIONIST
CALL: 800-622-1147
7AM - 6PM CST

13.00
AMOUNT DUE

1
AIRBILLS

1529507244080044409000130037

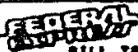
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THIS DOCUMENT WITH YOUR REMITTANCE

10053..... 5-91617 22313

WILDER FOR PRESIDENT
MELISSA BLACK 82
PO BOX 25833
ALEXANDRIA, VA 22313-9833

MAIL PAYMENT TO:
FEDERAL EXPRESS CORP
PO BOX 1148 DEPT A
MEMPHIS, TN 38101-1148



BILL TO: WILDER FOR PRESIDENT
201 N UNION ST STE 300
ALEXANDRIA, VA 22314

SENDER ACTIVITY SUMMARY

PAGE 1 OF 1
DATE 08/30/91
INVOICE NO. 4-408-00444 ACCOUNT NO. 1529-5072-1

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
6728971233	NICHOLAS PERRINS WILDER FOR PRESIDENT 201 N UNION ST STE 300 ALEXANDRIA, VA 22314	PAR MORACE SECRETARY OF THE COMMONWEALTH OLD FINANCE BLDG RICHMOND, VA 23219 AA DELIVERED 08/21/91 10:02 SIGNED: P.TUCKER	1/ NA	PRIORITY LTR DISCOUNT	15.50 -2.50	
75752902	1 DROP OFF 08/20/91					13.00
SENDER SUBTOTAL			13.00	PAY THIS AMOUNT		13.00



REMITTANCE ADVICE

PAYMENT DUE IN 15 DAYS

05070129036

ENC 104 0112

Acct # 1529-5072-1

WILDER EXPLORATORY COMMITTEE
 P.O. BOX 25033
 ALEXANDRIA, VA 22304

9-25-91

226

PAY TO THE ORDER OF Federal Express Corporation

Fifty Six and 00/100 \$ 56.00

SOVRAN BANK

FOR 1529 5072-1 M. R. Warner

⑆056007387⑆ 7922 1933⑆ 0226 ⑆0000005625⑆

INVOICE 4-427-10722

34013068

056007387

UPNS

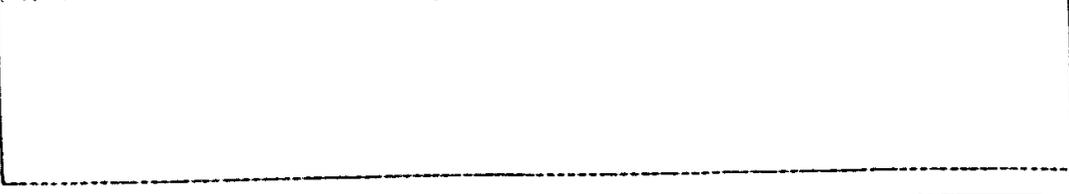
UP NATL BANK

FED EX

MEMPHIS, TN

60-088559

PGC 500 0118



FEDERAL EXPRESS

REMITTANCE ADVICE

PAYMENT DUE IN 15 DAYS

1529-5072-1 4-427-10722 09/20/91
ACCOUNT NUMBER INVOICE NUMBER DATE

ADDRESS CORRECTIONS?
CALL: 800-622-1147
7AM - 6PM CST

56.25
AMOUNT DUE

1
AIRBILLS

1529507264271072248000542592

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10049***** 5-BIGIT 22313
WILDER FOR PRESIDENT
MELISSA BLACK S2
PO BOX 25033
ALEXANDRIA, VA 22313-5033

MAIL PAYMENT TO:
FEDERAL EXPRESS CORP
PO BOX 1140 DEPT A
MEMPHIS, TN 38101-1140

05179122-26

FEDERAL EXPRESS

SENDER ACTIVITY SUMMARY

PAGE 1 OF 2

BILL TO: WILDER FOR PRESIDENT
201 N UNION ST STE 300
ALEXANDRIA, VA 22314

INVOICE NO. 4-427-10722 ACCOUNT NO. 1529-5072-1

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
7961807812	WILDER FOR PRESIDENT 201 N UNION ST STE 300 ALEXANDRIA, VA 22314	MARK WARNER WILDER EXPLORATORY COMMITTEE 201 NORTH UNION ST STE 300 ALEXANDRIA, VA 22314 AA DELIVERED 09/09/91 10:18 SIGNED: K. WALSH	1/ 12	PRIORITY BOX DISCOUNT SAT SERVICE	48.75 -2.50 10.00	
31888474 1	1ST ATTEMPT 09/07/91 11:02 08 DROP OFF 09/06/91					56.25
SENDER SUBTOTAL			56.25	PAY THIS AMOUNT		56.25

PGC 500 0118

FEDERAL EXPRESS

ACTIVITY SUMMARY

PAGE 2 OF 2

BILL TO: WILDER FOR PRESIDENT
201 N UNION ST STE 300
ALEXANDRIA, VA 22314

INVOICE NO. 4-427-10722 ACCOUNT NO. 1529-5072-1

FEDERAL EXPRESS PACKAGE DELIVERY STATUS CODES:

08 RECIPIENT NOT IN/BUSINESS CLOSED

Page 63 of 123

Acct # 1529-5072-1

WILDER EXPLORATORY COMMITTEE
 P.O. BOX 2503
 ALEXANDRIA, VA 22304

230

9.25.91

PAY TO THE ORDER OF Federal Express Corp \$ 24.35

307051244 10-01-91 024.67 078.35

Thirty Four and 15/100

SOVRAN BANK

FOR DEPOSIT ONLY 442055212

Mark H. Wang

⑆056007387⑆ 7922 1933 0230 ⑆0000001475⑆

INVOICE 4-420-55212

9 5 0 7 0 1 9-2

34013067

10/11/91

056007387

UPNS

UPNATL BANK

MEMPHIS, TN

FED EX

60-006559



REMITTANCE ADVICE

PAYMENT DUE IN 15 DAYS

1529-5072-1 4-420-55212 09/13/91
ACCOUNT NUMBER INVOICE NUMBER DATE

ADDRESS CORRECTIONS?
CALL: 800-622-1147
7AM - 6PM EST

34.75
AMOUNT DUE

2
AIRBILLS

1529507244205521290000347514

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TO INSURE PROPER CREDIT, PLEASE RETURN
THIS DOCUMENT WITH YOUR REMITTANCE

10049***** 5-DIGIT 22313
WILDER FOR PRESIDENT
MELISSA BLACK 82
PO BOX 114033
ALEXANDRIA, VA 22313-9033

MAIL PAYMENT TO:
FEDERAL EXPRESS CORP
PO BOX 1140 SEPT 8
MEMPHIS, TN 38101-1140



BILL TO: WILDER FOR PRESIDENT
201 N UNION ST STE 300
ALEXANDRIA, VA 22314

SENDER ACTIVITY SUMMARY

PAGE 1 OF 1
DATE 09/13/91
INVOICE NO. 4-420-55212 ACCOUNT NO. 1529-5072-1

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
6728970894 24617714 1	JARAN CALLAHAN WILDER FOR PRESIDENT 201 N UNION ST STE 300 ALEXANDRIA, VA 22314 DROPPED 09/09/91	RUTH JONES THE HONORABLE DOUGLAS WILDER STATE HOUSE 3RD FL RICHMOND, VA 23219 AA DELIVERED 09/10/91 10:14 SIGNED: H.GORSENER	1/ NA	PRIORITY LTR DISCOUNT	15.50 -2.50	13.00
6728971141 24617714 1	JOHN BRAZIELL WILDER FOR PRESIDENT 201 N UNION ST STE 300 ALEXANDRIA, VA 22314 DROPPED 09/09/91	PAUL GOELMAN VA DEM PARTY 1001 E BROAD STREET RICHMOND, VA 23219 AA DELIVERED 09/10/91 08:54 SIGNED: S.COSBY	1/ 2	PRIORITY PAK DISCOUNT	24.25 -2.50	21.75
SENDER SUBTOTAL			34.75	PAY THIS AMOUNT	34.75	



REMITTANCE ADVICE

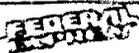
PAYMENT DUE IN 15 DAYS

1003-1274-A 4-420-55212 09/13/91

34.75

2

0 5 1 7 1 1 9 2 3 4 5 6 7 8 9



HERITANCE ADVICE

PAYMENT DUE IN 15 DAYS

1529-5072-1
ACCOUNT NUMBER

4-444-99112
INVOICE NUMBER

10/11/91
DATE

ADDRESS CORRECTEDS:
CALL: 800-422-1147
7AM - 6PM EST

114.25
AMOUNT DUE

7
AIRBILLS

1529507244469911296001142564

DO NOT STAPLE OR PAPER CLIP

TO INSURE PROPER CREDIT, PLEASE RETURN
THIS DOCUMENT WITH YOUR REMITTANCE

10051..... 5-01617 22313
WILDER FOR PRESIDENT
MELISSA BLACK 82
PO BOX 25033
ALEXANDRIA, VA 22313-5033

MAIL PAYMENT TO:
FEDERAL EXPRESS COMP
PO BOX 1140 DEPT A
MEMPHIS, TN 38101-1140



BILL TO: WILDER FOR PRESIDENT
201 N UNION ST STE 300
ALEXANDRIA, VA 22314

SENDER ACTIVITY SUMMARY

PAGE 1 OF 4
DATE 10/11/91
INVOICE NO. 4-444-99112 ACCOUNT NO. 1529-5072-1

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
6728970920	SARAH CALLAHAN WILDER FOR PRESIDENT 201 N UNION ST STE 300 ALEXANDRIA, VA 22314	FRANCES/PHIS OFFICE OFFICE OF GOVERNOR WILDER 3RD BROAD ST-STA CAPITOL RICHMOND, VA 23219 AA DELIVERED 10/01/91 14:12 SIGNED: J. CANADY	1/ WA	PRIORITY LTR DISCOUNT	15.50 -2.50	
75723334	1 DROP OFF 09/30/91					13.00
6728970931	SARAH CALLAHAN WILDER FOR PRESIDENT 201 N UNION ST STE 300 ALEXANDRIA, VA 22314	MS CAROL DAVISON THE OFFICE OF GOVERNOR WILDER BROAD ST / STATE CAPITOL RICHMOND, VA 23215 AA DELIVERED 10/02/91 10:07 SIGNED: T. NICKET	1/ 2	STANDARD PAK DISCOUNT ADDRESS CORR	16.50 -2.50 3.00	
75740134	1 DROP OFF 10/01/91					19.00
6728970942	SARAH CALLAHAN WILDER FOR PRESIDENT 201 N UNION ST STE 300 ALEXANDRIA, VA 22314	CAROL DAVISON OFFICE OF THE GOVERNORS 3RD F STATE HOUSE OF VIRGINIA/BROAD RICHMOND, VA 23219 AA DELIVERED 10/03/91 13:34 SIGNED: M. GOERCHER	1/ 3	STANDARD PAK DISCOUNT	17.50 -2.50	
75759526	1 DROP OFF 10/02/91					15.00

CONTINUED NEXT PAGE



BILL TO: WILDER FOR PRESIDENT
201 N UNION ST STE 300
ALEXANDRIA, VA 22314

SENDER ACTIVITY SUMMARY

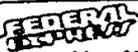
PAGE 2 OF 4
DATE 10/11/91
INVOICE NO. 4-444-99112 ACCOUNT NO. 1529-5072-1

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
6728971185	BILL KEOUGH WILDER FOR PRESIDENT 201 N UNION ST STE 300 ALEXANDRIA, VA 22314	JOHN BRAZIELL WILDER FOR PRES 201 N UNION ST STE 300 ALEXANDRIA, VA 22314 AA DELIVERED 10/03/91 08:57 SIGNED: T. MCCABE	1/ WA	PRIORITY LTR	15.50	
44198000	1 SHIPPED 10/02/91					15.50
6728971455	SARAH CALLAHAN WILDER FOR PRESIDENT 201 N UNION ST STE 300 ALEXANDRIA, VA 22314	RUSSELL VERNEY NEW HAMPSHIRE DEMOCRATIC PARTY 750 NORTH MAIN ST CONCORD, NH 03301 AA DELIVERED 10/04/91 11:13 SIGNED: R. SHARIRE	1/ WA	STANDARD LTR DISCOUNT	11.50 -2.50	
75753893	1 DROP OFF 10/03/91					9.00
6728971163	WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	MR ALBERT J DVOSKIN AJ DVOSKIN & ASSOC 3050 CHAIN BRIDGE RD STE 200 FAIRFAX, VA 22030 AA DELIVERED 10/07/91 10:26 SIGNED: B. SMITH	1/ 4	PRIORITY PAK	29.75	
44198033	1 SHIPPED 10/04/91					29.75

CONTINUED NEXT PAGE

ATTACHMENT 6

PAGE 67 OF 102



BILL TO: WILDER FOR PRESIDENT

SENDER ACTIVITY SUMMARY

PAGE 3 OF 4

FEDERAL EXPRESS SENDER ACTIVITY SUMMARY PAGE 3 OF 4
 DATE 10/11/91
 BILL TO: WILDER FOR PRESIDENT 201 W UNION ST STE 300 ALEXANDRIA, VA 22314 INVOICE NO. 4-448-99112 ACCOUNT NO. 1529-5072-1

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
6728771174	CAROL DAVIDSON WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	STEVE ALAN BENNETT BANK ONE TEXAS B & 1600 PACIFIC PLACE SEITH FLOOR DALLAS, TX 75201 AA DELIVERED 10/08/91 09:00 SIGNED: B. CARTW	1/ NA	PRIORITY LTR DISCOUNT	15.50 -2.50	
73431632	1 DROP OFF 10/07/91					13.00
SENDER SUBTOTAL			114.25	PAY THIS AMOUNT		114.25

FEDERAL EXPRESS ACTIVITY SUMMARY PAGE 4 OF 4
 DATE 10/11/91
 BILL TO: WILDER FOR PRESIDENT 201 W UNION ST STE 300 ALEXANDRIA, VA 22314 INVOICE NO. 4-448-99112 ACCOUNT NO. 1529-5072-1

FEDER HAS AUDITED THIS AIRBILL FOR CORRECT PIECES, WEIGHT, AND SERVICE. ANY CHANGES MADE ARE REFLECTED IN THE INVOICE AMOUNT.

9 5 0 7 0 1 2 2



REMITTANCE ADVICE

PAYMENT DUE IN 15 DAYS

1529-5072-1 4-453-49204 10/18/91
ACCOUNT NUMBER INVOICE NUMBER DATE

ADDRESS CORRECTIONS?
CALL: 800-622-1147
7AM - 6PM EST

115.00
AMOUNT DUE AIRBILLS 6

1529507244534920450001150044

DO NOT STAPLE OR PAPER CLIP

TO INSURE PROPER CREDIT, PLEASE RETURN
THIS DOCUMENT WITH YOUR REMITTANCE

10050***** 9-DIGIT 22313
WILDER FOR PRESIDENT
MELISSA BLACK 82
PO BOX 25033
ALEXANDRIA, VA 22313-5033

RAIL PAYMENT TO:
FEDERAL EXPRESS CORP
PO BOX 1140 DEPT A
MEMPHIS, TN 38101-1140



BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

SENDER ACTIVITY SUMMARY

PAGE 1 OF 2

DATE 10/18/91

INVOICE NO. 4-453-49204 ACCOUNT NO. 1529-5072-1

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
6728971196	D KEOUGH WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	JOHN BRAZZELL WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD STE 404 FAIRFAX, VA 22030 AA DELIVERED 10/09/91 10:23 SIGNED: S.CALLAHAN	1/ NA	PRIORITY LTR	15.50	
44198044	1 SHIPPED 10/08/91					15.50
6728970964	SARAH CALLAHAN WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	CAROL DAVIDSON JR THE OFFICE OF GOVERNOR WILDER BROAD ST/STATE CAPITOL OF VIR RICHMOND, VA 23219 AA DELIVERED 10/10/91 10:14 SIGNED: T.HICKET	1/ 1	STANDARD PAK	15.50	
96767414	1 SHIPPED 10/09/91					15.50
6728970975	SARAH CALLAHAN WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	CAROL DAVIDSON/ROB TYLER THE OFFICE OF GOVERNOR WILDER STATE CAPITOL OF VIRGINIA RICHMOND, VA 23219 AA DELIVERED 10/11/91 04:53 SIGNED: J.BROADY	1/ NA	PRIORITY LTR	15.50	
96766762	1 SHIPPED 10/10/91					15.50

CONTINUED NEXT PAGE



BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

SENDER ACTIVITY SUMMARY

PAGE 2 OF 2

DATE 10/18/91

INVOICE NO. 4-453-49204 ACCOUNT NO. 1529-5072-1

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
6728971222	WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	JOHN BRAZZELL WILDER FOR PRESIDENT COMMITTEE 3050 CHAIN BRIDGE RD STE 404 FAIRFAX, VA 22030 AA DELIVERED 10/11/91 09:51 SIGNED: I.DICKENS	1/ 1	PRIORITY PAK	22.50	
74027435	1 SHIPPED 10/10/91					22.50
3652349050	SARAH CALLAMER WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	CAROL DAVIDSON OFFICE OF THE GOVERNOR JR STATE CAPITOL OF VIRGINIA RICHMOND, VA 23219 AA DELIVERED 10/12/91 11:22 SIGNED: T.HICKET	1/ 3	PRIORITY PAK DISCOUNT SAT SERVICE	27.00 -2.50 10.00	
96746235	1 DROP OFF 10/11/91					34.50
6728970986	SARAH CALLAN WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	CAROL DAVIDSON OFFICE OF THE GOVERNOR J STATE CAPITOL OF VIRGINIA RICHMOND, VA 23219 AA DELIVERED 10/15/91 11:54 SIGNED: R.GEOGHERN	1/ NA	STANDARD LTR	11.50	
96772152	1 SHIPPED 10/14/91					11.50
SENDER SUBTOTAL			115.00	PAY THIS AMOUNT		115.00

ATTACHMENT 6
Page 70 of 122

FEDERAL

REMITTANCE ADVICE

PAYMENT DUE IN 15 DAYS

1529-5072-1 4-467-56142 11/01/91
 ACCOUNT NUMBER INVOICE NUMBER DATE

ADDRESS CORRECTIONST
 CALL: 800-622-1147
 7AM - 6PM EST

660.75 39
 AMOUNT DUE AIRBILLS

1529507244675614219004607588

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WILDER FOR PRESIDENT
 MELISSA BLACK 12
 PO BOX 25033
 ALEXANDRIA, VA 22313-5033

MAIL PAYMENT TO:
 FEDERAL EXPRESS CORP
 PO BOX 1140 DEPT A
 MEMPHIS, TN 38101-1140

FEDERAL

BILL TO: WILDER FOR PRESIDENT
 3050 CHAIN BRIDGE RD
 FAIRFAX, VA 22030

SENDER ACTIVITY SUMMARY

PAGE 1 OF 17
 DATE 11/01/91
 INVOICE NO. 4-467-56142 ACCOUNT NO. 1529-5072-1

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
2908609594	SARAH CALLANAM WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	WYLIE SLAGEL 37 PLAINS RD WINDHAM, CT 06250 PH DELIVERED 10/24/91 15:11 SIGNED: S. CALLANAM	1/ 2	PRIORITY PAK	24.25	
87294152	1 SHIPPED 10/23/91					24.25
2908609616	MARK WARREN WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	JACK HARRIS 110 N MINERAL SPRING RD DURHAM, NC 27703 AA DELIVERED 10/24/91 14:15 SIGNED: J. HARRIS	1/ NA	STANDARD LTR DISCOUNT	11.50 -2.50	
58363486	1 1ST ATTEMPT 10/24/91 11:39 08 DROPPED OFF 10/23/91					9.00
2908609620	MARK WARREN WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	73 LYNN SPOZART 6921 CAPITAL BLVD RALEIGH, NC 27604 AA DELIVERED 10/24/91 11:57 SIGNED: D. DEAN	1/ NA	STANDARD LTR DISCOUNT	11.50 -2.50	
58363486	DROPPED OFF 10/23/91					9.00

CONTINUED NEXT PAGE

FEDERAL

BILL TO: WILDER FOR PRESIDENT
 3050 CHAIN BRIDGE RD
 FAIRFAX, VA 22030

SENDER ACTIVITY SUMMARY

PAGE 2 OF 17
 DATE 11/01/91
 INVOICE NO. 4-467-56142 ACCOUNT NO. 1529-5072-1

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
2908609642	MARK B WARREN WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	ATTON M AYILE 616 YARD ST GRANHAM, NC 27253 AA DELIVERED 10/24/91 11:44 SIGNED: L. APPLE	1/ NA	STANDARD LTR DISCOUNT	11.50 -2.50	
58363486	1 DROPPED OFF 10/23/91					9.00
2908609653	MARK WARREN WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	MARVIN ANDREW 101 CREECH RD GARDNER, NC 27529 AA DELIVERED 10/24/91 11:44 SIGNED: 628758	1/ NA	STANDARD LTR DISCOUNT	11.50 -2.50	
58363486	1 DROPPED OFF 10/23/91					9.00
2908681801	MARK WARREN WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	JUANITA F HARRIS 110 N MINERAL SPRING RD DURHAM, NC 27703 AA DELIVERED 10/24/91 14:15 SIGNED: J. HARRIS	1/ NA	STANDARD LTR DISCOUNT	11.50 -2.50	
58363486	1 1ST ATTEMPT 10/24/91 11:39 08 DROPPED OFF 10/23/91					9.00

CONTINUED NEXT PAGE



BILL TO: WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030 SENDER ACTIVITY SUMMARY INVOICE NO. 4-467-56142 ACCOUNT NO. 1529-5072-1 PAGE 6 OF 17 DATE 11/01/91

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
3652348980- 58363486 1	MARK WARNER WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030 1ST ATTEMPT 10/24/91 09:08 16 DROP OFF 10/23/91	MR JOHN SMALL 2500 N 124TH ST 105 MILWAUKEE, WI 53222 AA DELIVERED 10/23/91 14:06 SIGNED: RETURN A80132192426	1/ NA	STANDARD LTR DISCOUNT ADDRESS CORR	11.50 -2.50 3.00	14.00
3652348991 58363486 1	MARK WARNER WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030 1ST ATTEMPT 10/24/91 12:45 08 DROP OFF 10/23/91	DENNIS W ARCHER 1642 LINCOLNSHIRE DR HIGHLAND PARK, MI 48203 AA DELIVERED 10/23/91 12:36 SIGNED: E. FOWDAER	1/ NA	STANDARD LTR DISCOUNT	11.50 -2.50	9.00
3652349013 58363486 1	MARK WARNER WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030 DROP OFF 10/23/91	MR DAVID WILLIAM DUSKIN 17171 W HINE HOLE RUN 1325 SOUTHFIELD, MI 48076 AA DELIVERED 10/24/91 12:21 SIGNED: N. DOMINICK	1/ NA	STANDARD LTR DISCOUNT	11.50 -2.50	9.00

CONTINUED NEXT PAGE



BILL TO: WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030 SENDER ACTIVITY SUMMARY INVOICE NO. 4-467-56142 ACCOUNT NO. 1529-5072-1 PAGE 7 OF 17 DATE 11/01/91

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
3652349026 58363486 1	MARK WARNER WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030 DROP OFF 10/23/91	MS JUNE BROOKS 658 DURLWAY RD DURLINGAME, CA 94018 AA DELIVERED 10/26/91 09:33 SIGNED: K. ADAMS	1/ NA	STANDARD LTR DISCOUNT	11.50 -2.50	9.00
3652349035 58363486 1	MARK W WARNER WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030 DROP OFF 10/23/91	MRS ELLEN C POWERS 10 STURGES HWT WESTPORT, CT 06880 AA DELIVERED 10/26/91 11:54 SIGNED: E. POWERS	1/ NA	STANDARD LTR DISCOUNT	11.50 -2.50	9.00
3652349046 87294152 1	SARAH CALLAHAN WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030 SHIPPED 10/23/91	CAROL DAVISON OFFICE OF GOVERNOR WILDER 3 STATE CAPITOL OF VIRGINIA RICHMOND, VA 23219 AA DELIVERED 10/26/91 14:40 SIGNED: N. GOERNGER	1/ NA	STANDARD LTR	11.50	11.50

CONTINUED NEXT PAGE



BILL TO: WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030 SENDER ACTIVITY SUMMARY INVOICE NO. 4-467-56142 ACCOUNT NO. 1529-5072-1 PAGE 8 OF 17 DATE 11/01/91

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
6728971012 58363486 1	MARK WARNER WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030 1ST ATTEMPT 10/24/91 14:17 08 DROP OFF 10/23/91	WOODY SUE TOMA 38775 FOURTEEN MILE RD FARMINGTON HILLS, MI 48331 AA DELIVERED 10/23/91 13:48 SIGNED: W TOMA	1/ NA	STANDARD LTR DISCOUNT	11.50 -2.50	9.00
6728971023 58363486 1	MARK WARNER WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030 DROP OFF 10/23/91	A W MILLER 6435 WESTHOOR RD BIRMINGHAM, MI 48010 AA DELIVERED 10/24/91 13:48 SIGNED: A. MILLER	1/ NA	STANDARD LTR DISCOUNT	11.50 -2.50	9.00
6728971034 58363486 1	MARK WARNER WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030 DROP OFF 10/23/91	LINDA B BLAIR 4936 BODMAN ST NW WASHINGTON, DC 20014 AA DELIVERED 10/24/91 12:49 SIGNED: L. BLAIR	1/ NA	STANDARD LTR DISCOUNT	11.50 -2.50	9.00

CONTINUED NEXT PAGE



BILL TO: WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030 SENDER ACTIVITY SUMMARY INVOICE NO. 4-467-56142 ACCOUNT NO. 1529-5072-1 PAGE 9 OF 17 DATE 11/01/91

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
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ATTACHMENT
 Page 12 of 12



BILL TO: WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030 SENDER ACTIVITY SUMMARY INVOICE NO. 4-467-56142 ACCOUNT NO. 1529-5072-1 PAGE 12 OF 17 DATE 11/01/91

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
2908609583	SARAH CALLANAN WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	PAUL GOLDMAN 13029 FOREST LIGHT COURT RICHMOND, VA 23233 AA DELIVERED 10/26/91 11:44 SIGNED: L. OIPASOVA	1/ MA	PRIORITY LTR 1st SERVICE	15.50 10.00	
87399023 1	SHIPPED 10/25/91					25.50
SENDER SUBTOTAL			368.75	CONTINUED NEXT PAGE		



BILL TO: WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030 RECIPIENT ACTIVITY SUMMARY INVOICE NO. 4-467-56142 ACCOUNT NO. 1529-5072-1 PAGE 13 OF 17 DATE 11/01/91

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
7941807963	RUTH JONES STATE CAPITOL RICHMOND, VA 23219	SARAH CALLANAN WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD STE 404 FAIRFAX, VA 22030 AA DELIVERED 10/25/91 10:18 SIGNED: C. SMITH	1/ MA	PRIORITY LTR	15.50	
74026304 1	SHIPPED 10/24/91					15.50
RECIPIENT SUBTOTAL			15.50	CONTINUED NEXT PAGE		



BILL TO: WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030 THIRD PARTY ACTIVITY SUMMARY INVOICE NO. 4-467-56142 ACCOUNT NO. 1529-5072-1 PAGE 14 OF 17 DATE 11/01/91

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
7941807952	RUTH JONES STATE CAPITOL RICHMOND, VA 23219	BENJAMIN B BROWN 657 BELVIDERE AVE PLAINFIELD, NJ 07062 AA DELIVERED 10/25/91 10:18 SIGNED: B. BROWN	1/ MA	PRIORITY LTR	15.50	
74026304 1	SHIPPED 10/24/91					15.50
7941807985	RUTH JONES GOVERNORS OFFICE STATE CAPITOL RICHMOND, VA 23219	AL DHOSEKIN 3050 CHAIN BRIDGE RD STE 200 FAIRFAX, VA 22030 AA DELIVERED 10/25/91 10:19 SIGNED: P. LYBON	1/ MA	PRIORITY LTR	15.50	
74026304 1	SHIPPED 10/24/91					15.50
7941807996	RUTH JONES STATE CAPITOL RICHMOND, VA 23219	CATHY LASH CONGRESSMAN MORAN'S OFFICE 1523 LONGWORTH N O B WASHINGTON, DC 20515 AA DELIVERED 10/25/91 09:52 SIGNED: M. BROWN	1/ MA	PRIORITY LTR	15.50	
74026304 1	SHIPPED 10/24/91					15.50
			CONTINUED NEXT PAGE			

Attachment 6



BILL TO: WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030 THIRD PARTY ACTIVITY SUMMARY INVOICE NO. 4-467-56142 ACCOUNT NO. 1529-5072-1 PAGE 15 OF 17 DATE 11/01/91

Page 73 of 123



BILL TO: WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030 THIRD PARTY ACTIVITY SUMMARY INVOICE NO. 4-467-56142 ACCOUNT NO. 1529-5072-1 PAGE 15 OF 17 DATE 11/01/91

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
9731175364	PAUL GOLDBRAN ATTORNEY 13209 FOREST LIGHT CT RICHMOND, VA 23233	CASE DI SILVA WIRTECH INT'L 14231 WILLAR, RD CHANTILLY, VA 22021 AA DELIVERED 10/23/91 10:05 SIGNED: W.DESILVA	1/ 5	PRIORITY BOX DISCOUNT	32.50 -2.50	
77708444	1 DROP OFF 10/24/91					30.00
THIRD PARTY SUBTOTAL			76.50	PAY THIS AMOUNT	468.75	



BILL TO: WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030 ACTIVITY SUMMARY INVOICE NO. 4-467-56142 ACCOUNT NO. 1529-5072-1 PAGE 16 OF 17 DATE 11/01/91

FEDERATED HAS AUDITED THIS AIRBILL FOR CORRECT PIECES, WEIGHT, AND SERVICE. ANY CHARGES MADE ARE REFLECTED IN THE INVOICE AMOUNT.



BILL TO: WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030 ACTIVITY SUMMARY INVOICE NO. 4-467-56142 ACCOUNT NO. 1529-5072-1 PAGE 17 OF 17 DATE 11/01/91

FEDERAL EXPRESS PACKAGE DELIVERY STATUS CODES:

02 RELEASE SIGNATURE ON FILE OR RECIPIENT NOT IN/BUSINESS CLOSED

14 SHIPMENT RETURNED TO SENDER

ATTACHMENT Page 17 of 126



REMITTANCE ADVICE PAYMENT DUE IN 15 DAYS

95070192703

PERMIT
1000000000

REMITTANCE ADVICE

PAYMENT DUE IN 15 DAYS

1529-5072-1 4-440-28517 10/04/91
ACCOUNT NUMBER INVOICE NUMBER DATE

ADDRESS CORRECTIONS?
CALL: 800-622-1147
7AM - 8PM EST

41.50
AMOUNT DUE

3
AIRBILLS

152950724402851717000415093

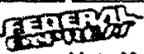
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10051..... 5-DIGIT 2213
WILDER FOR PRESIDENT
MELISSA BLACK 82
PO BOX 25033
ALEXANDRIA, VA 22313-5033

MAIL PAYMENT TO:
FEDERAL EXPRESS CORP
PO BOX 1140 DEPT A
MEMPHIS, TN 38101-1140

95079122109

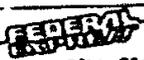


BILL TO: WILDER FOR PRESIDENT
201 N UNION ST STE 300
ALEXANDRIA, VA 22314

SENDER ACTIVITY SUMMARY

PAGE 1 OF 2
DATE 10/04/91
INVOICE NO. 4-440-28517 ACCOUNT NO. 1529-5072-1

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
6728970916	WILDER FOR PRESIDENT 201 N UNION ST STE 300 ALEXANDRIA, VA 22314	MR ROB SWINN CSI 901 E CAREY 18TH FLOOR RICHMOND, VA 23220 AA DELIVERED 09/24/91 11:51 SIGNED: B.ROMANOE	1/ S	STANDARD PAK DISCOUNT	19.50 -2.50	17.00
24417810	1 DROP OFF 09/23/91					
6728970935	WILDER FOR PRESIDENT 201 N UNION ST STE 300 ALEXANDRIA, VA 22314	MELISSA BLACK WILDER FOR PRESIDENT 201 N UNION STREET 300 ALEXANDRIA, VA 22314 AA DELIVERED 09/25/91 13:23 SIGNED: S.WALSH	1/ MA	STANDARD LTR	11.50	11.50
24502401	1 SHIPPED 09/24/91					
SENDER SUBTOTAL			28.50	CONTINUED NEXT PAGE		



BILL TO: WILDER FOR PRESIDENT
201 N UNION ST STE 300
ALEXANDRIA, VA 22314

RECIPIENT ACTIVITY SUMMARY

PAGE 2 OF 2
DATE 10/04/91
INVOICE NO. 4-440-28517 ACCOUNT NO. 1529-5072-1

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
9338802675	RUTH JONES GOVERNORS OFFICE STATE CAPITOL RICHMOND, VA 23219	LESLIE J KERRAN EPSTEIN DECKER & GREEN PC 1227 25TH ST NW STE 800 WASHINGTON, DC 20037 AA DELIVERED 09/27/91 09:47 SIGNED: M.TEMPLIN	1/ MA	PRIORITY LTR DISCOUNT	1.50 -2.50	13.00
73431901	1 DROP OFF 09/26/91					
RECIPIENT SUBTOTAL			13.00	PAY THIS AMOUNT 43.50		



REMITTANCE ADVICE

PAYMENT DUE IN 15 DAYS

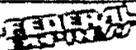
95070122.10

RECIPIENT SUBTOTAL

24.25

PAY THIS AMOUNT

24.25



REMITTANCE ADVICE

PAYMENT DUE IN 15 DAYS

1529-5072-1 4-460-31495 10/25/91
 ACCOUNT NUMBER INVOICE NUMBER DATE

ADDRESS CORRECTIONS:
 CALL: 800-822-1147
 7AM - 6PM EST

121.25
 AMOUNT DUE

6
 AIRBILLS

1529507244603149501001212519

DO NOT STAPLE OR PAPER CLIP

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 THIS DOCUMENT WITH YOUR REMITTANCE

10049..... S-81617 22513
 WILDER FOR PRESIDENT
 MELISSA BLACK 02
 PO BOX 25033
 ALEXANDRIA, VA 22313-5033

MAIL PAYMENT TO:
 FEDERAL EXPRESS COMP
 PO BOX 1140 DEPT A
 MEMPHIS, TN 38101-1140



SENDER ACTIVITY SUMMARY

PAGE 1 OF 4

DATE 10/25/91

BILL TO: WILDER FOR PRESIDENT
 3050 CHAIN BRIDGE RD
 FAIRFAX, VA 22030

INVOICE NO. 4-460-31495 ACCOUNT NO. 1529-5072-1

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
6728970990	SARAH CALLAHAN WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	CAROL DAVIDSON OFFICE OF GOVERNOR WILDER 3 STATE CAPITOL OF VIRGINIA RICHMOND, VA 23219 AA DELIVERED 10/16/91 13:19 SIGNED: R.GOEGER	1/ NA	STANDARD LTR	11.50	
96767871	1 SHIPPED 10/15/91					11.50
6728971200	JOHN BRAZZELL WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	DR RICHARD CAMBITTA 7605 MORNINGSIDE HILL SAN ANTONIO, TX 78255 AA DELIVERED 10/16/91 08:56 SIGNED: RCAMBITTA	1/ 8	PRIORITY PAK	40.75	
44198011	1 SHIPPED 10/15/91					40.75
6728971211	B KEDUGH WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	JOHN BRAZZELL WILDER FOR PRESIDENT STE 406 3050 CHAIN BRIDGE RD FAIRFAX VA 22030 AA DELIVERED 10/16/91 10:50 SIGNED: J.LADEIS	1/ NA	STANDARD LTR	11.50	
44198011	1 SHIPPED 10/15/91					11.50

CONTINUED NEXT PAGE



SENDER ACTIVITY SUMMARY

PAGE 2 OF 4

DATE 10/25/91

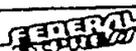
BILL TO: WILDER FOR PRESIDENT
 3050 CHAIN BRIDGE RD
 FAIRFAX, VA 22030

INVOICE NO. 4-460-31495 ACCOUNT NO. 1529-5072-1

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
6728971001	NICHOLAS PERRINS WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	BENETRIOUS MADDOX GRASSROOTS SYSTEMS INC 3920 FAIRBANKS AVE DATTOM, OH 45407 AA DELIVERED 10/17/91 09:45 SIGNED: P.MADDOX	1/ NA	PRIORITY LTR	15.50	
96768534	1 SHIPPED 10/16/91					15.50
3652348873	JOE JOHNSON WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	MR ROBERT BRITTON 102 WOODMONT BLVD NASHVILLE, TN 37205 AA DELIVERED 10/21/91 10:22 SIGNED: B.WESNIEWSKI	1/ NA	PRIORITY LTR SAT SERVICE	15.50 10.00	
87291223	1 SHIPPED 10/18/91					25.50
3652348862	SARAH CALLAHAN WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	CAROL DAVIDSON OFFICE OF GOVERNOR WILDER 3 STATE CAPITOL OF VIRGINIA RICHMOND, VA 23219 AA DELIVERED 10/22/91 13:48 SIGNED: T.NICKY	1/ 2	STANDARD PAK	16.50	
96772104	1 SHIPPED 10/21/91					16.50
SENDER SUBTOTAL			121.25	PAY THIS AMOUNT		121.25

ATTACHMENT

Page 77 of 150



ACTIVITY SUMMARY

PAGE 3 OF 4

DATE 10/25/91

BILL TO: WILDER FOR PRESIDENT
 3050 CHAIN BRIDGE RD
 FAIRFAX, VA 22030

INVOICE NO. 4-460-31495 ACCOUNT NO. 1529-5072-1

FEDERAL
EXPRESS

BILL TO: WILBER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

ACTIVITY SUMMARY

PAGE 3 OF 4
DATE 10/25/91
INVOICE NO. 4-440-31495 ACCOUNT NO. 1529-5072-1

FEDER WAS AUDITED THIS AIRBILL FOR CORRECT PIECES, WEIGHT, AND SERVICE. ANY CHARGES MADE ARE REFLECTED IN THE INVOICE AMOUNT.

FEDERAL
EXPRESS

BILL TO: WILBER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

ACTIVITY SUMMARY

PAGE 4 OF 4
DATE 10/25/91
INVOICE NO. 4-440-31495 ACCOUNT NO. 1529-5072-1

FEDERAL EXPRESS PACKAGE DELIVERY STATUS CODES:

02 RELEASE SIGNATURE ON FILE

08 RECIPIENT NOT IN/BUSINESS CLOSED

FEDERAL
EXPRESS

*****ADVICE

PAYMENT DUE IN 15 DAYS

REMITTANCE ADVICE

PAYMENT DUE IN 15 DAYS

NONE 4-552-94630 02/04/92
ACCOUNT NUMBER INVOICE NUMBER DATE

ADDRESS CORRECTIONS?
CALL: 800-622-1147
7AM - 6PM CST

23.50
AMOUNT DUE

1 AIRBILL

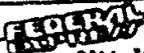
23240004552943058000235079

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ATTORNEY-WILDER
PAUL GOLDMAN
13209 FOREST LIGHT COURT
RICHMOND, VA 23233

MAIL PAYMENT TO:
FEDERAL EXPRESS CORP
PO BOX 1140 DEPT A
MEMPHIS, TN 38101-1140



BILL TO: ATTORNEY-WILDER
13209 FOREST LIGHT COURT
RICHMOND, VA 23233

SENDER ACTIVITY SUMMARY

PAGE 1 OF 2
DATE 02/04/92
NONE

INVOICE NO. 4-552-94630 ACCOUNT NO.

TRACKING NO. REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
3536193854	PAUL GOLDMAN ATTORNEY-WILDER 13209 FOREST LIGHT COURT RICHMOND, VA 23233	ALAN PUMPHREY 4015 FORBING RD APT 15 LITTLE ROCK, AR 72209 AR DELIVERED 01/23/92 13:10 SIGNED: E. PUMPHREY	17 4	STANDARD PK INVAL ACCT	18.50 5.00	
3272003	1 DROP OFF 01/22/92					23.50
SENDER SUBTOTAL			23.50/PAY THIS AMOUNT		23.50	



BILL TO: ATTORNEY-WILDER
13209 FOREST LIGHT COURT
RICHMOND, VA 23233

ACTIVITY SUMMARY

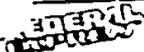
PAGE 2 OF 2
DATE 02/04/92
NONE

INVOICE NO. 4-552-94630 ACCOUNT NO.

FEDERAL EXPRESS IS UNABLE TO BILL THE THIRD PARTY ACCOUNT INDICATED ON THE ORIGINAL AIRBILL. THEREFORE, ACCORDING TO THE TERMS AND CONDITIONS LISTED ON THE BACK OF OUR AIRBILLS AND IN OUR MOST RECENT SERVICE GUIDE, THE CHARGES FOR THIS SHIPMENT MUST BE BILLED TO THE SENDER.

ATTACHMENT

Page 80 of 120



REMITTANCE ADVICE

PAYMENT DUE IN 15 DAYS

1685-4204-2 4-552-94630 02/04/92
ACCOUNT NUMBER INVOICE NUMBER DATE

ADDRESS CORRECTIONS?
CALL: 800-622-1147
7AM - 6PM CST

12.25
AMOUNT DUE

1 AIRBILL

311-055-550

P. 1/11/92



REMITTANCE ADVICE

PAYMENT DUE IN 15 DAYS

1568-6680-5 4-493-60641 11/30/91
ACCOUNT NUMBER INVOICE NUMBER DATE

ADDRESS CORRECTIONS?
CALL: 800-622-1147
7AM - 6PM CST

24.25
AMOUNT DUE

1
AIRBILLS

1568668646934064145000242574

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10046***** 5-0161T 22030
MILDER FOR PRESIDENT
#2
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

MAIL PAYMENT TO:
FEDERAL EXPRESS CORP
PO BOX 1148 DEPT A
MEMPHIS, TN 38101-9140



BILL TO: MILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

SENDER ACTIVITY SUMMARY

PAGE 1 OF 1
DATE 11/30/91
INVOICE NO. 4-493-60641 ACCOUNT NO. 1568-6680-5

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
3096806670	JOHN M BRAZZELL MILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	DEBORAH PARES 5 E WYBRACE S ASSOC STE 850 200 S BROAD ST THE BELLVIEW PHILADELPHIA, PA 19102 AA DELIVERED 11/25/91 08:57 SIGNED: S.MUNNELLY	1/ 2	PRIORITY PAK	24.25	
65915631	1 SHIPPED 11/22/91					24.25
SENDER SUBTOTAL			24.25	PAY THIS AMOUNT	24.25	

95 11 01 2-9-16



REMITTANCE ADVICE

PAYMENT DUE IN 15 DAYS

SENDER SUBTOTAL 38.30 PAY THIS AMOUNT 38.50



REMITTANCE ADVICE

PAYMENT DUE IN 15 DAYS

1568-6686-5 4-512-04059 12/20/91
 ACCOUNT NUMBER INVOICE NUMBER DATE

ADDRESS CORRECTIONS?
 CALL: 800-622-1147
 FAX - 6PM CST

657.25 10
 AMOUNT DUE AIRBILLS

1568668645120405955004572591

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00067***** CAR-RT SORT ** CB71
 WILDER FOR PRESIDENT
 S2
 3050 CHAIN BRIDGE RD
 FAIRFAX, VA 22030-2834

MAIL PAYMENT TO:
 FEDERAL EXPRESS CORP
 PO BOX 1140 DEPT A
 MEMPHIS, TN 38101-1140



BILL TO: WILDER FOR PRESIDENT
 3050 CHAIN BRIDGE RD
 FAIRFAX, VA 22030

SENDER ACTIVITY SUMMARY

INVOICE NO. 4-512-04059 ACCOUNT NO. 1568-6686-5
 PAGE 1 OF 9
 DATE 12/20/91

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
3621519532	JOHN BRAZZELL WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	DR CARITY 701 COMARIN AVE STE 200 RICHMOND VA 23226 AA DELIVERED 12/03/91 09:02 SIGNED: S.ROSTON	1/ 3	PRIORITY PAK	27.00	
85915056	1 SHIPPED 12/02/91					27.00
3621519370	JOHN BRAZZELL WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	MR JON PEREL GENERAL SERVICES INC 2722 RATHWAY RD RICHMOND VA 23225 AA DELIVERED 12/04/91 09:50 SIGNED: K.VINNER	1/ 8	PRIORITY PAK	40.75	
85911851	1 SHIPPED 12/03/91					40.75
3621519381	JOHN BRAZZELL WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	DR PEAT 11001 MIDLOTHIAN TERRACE MIDLOTHIAN, VA 23113 AA DELIVERED 12/05/91 09:11 SIGNED: 1204021980	1/ 1	PRIORITY PAK	22.50	
85911851	1 SHIPPED 12/03/91					22.50

CONTINUED NEXT PAGE

05070192717



BILL TO: WILDER FOR PRESIDENT
 3050 CHAIN BRIDGE RD
 FAIRFAX, VA 22030

SENDER ACTIVITY SUMMARY

INVOICE NO. 4-512-04059 ACCOUNT NO. 1568-6686-5
 PAGE 2 OF 9
 DATE 12/20/91

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
3338864771	ERIC EASTER WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	LEISA HENRY WARNER BROS 4000 WARNER BLVD BURBANK CA 91522 AA DELIVERED 12/11/91 10:26 SIGNED: K.MARTIN	1/ WA	PRIORITY LTR	15.50	
85904383	1 SHIPPED 12/10/91					15.50
7185822186	A P RUSSELLE WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	CHERYL LOSSER WILDER FOR PRESIDENT COMMITTEE 3050 CHAIN BRIDGE RD STE 404 FAIRFAX, VA 22030 AA DELIVERED 12/11/91 10:10 SIGNED: A.SMITH	1/ 25	PRIORITY PKG INVAL ACCTR	65.00 5.00	
87163473	1 SHIPPED 12/10/91					70.00
3338864292	ERIC EASTER WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	DEBORAH LANGFORD WARNER BROS 4000 WARNER BLVD BURBANK CA 91522 AA DELIVERED 12/12/91 10:58 SIGNED: A.MATS	1/ 8	STANDARD PAK	24.75	
87296742	1 SHIPPED 12/11/91					24.75

CONTINUED NEXT PAGE

ATTACHMENT

Page 23 of 122



BILL TO: WILDER FOR PRESIDENT
 3050 CHAIN BRIDGE RD
 FAIRFAX, VA 22030

SENDER ACTIVITY SUMMARY

INVOICE NO. 4-512-04059 ACCOUNT NO. 1568-6686-5
 PAGE 3 OF 9
 DATE 12/20/91

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
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87163673	1	FAIRFAX, VA 22030 SHIPPED 12/10/91	FAIRFAX, VA 22030 AA DELIVERED 12/11/91 10:10 SIGNED: A. SMITH				70.00
.3338864292		ERIC EASTER WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	DEBORAH LANGFORD WARNER BROS 4000 WARNER BLVD BURBANK, CA 91522 AA DELIVERED 12/12/91 10:50 SIGNED: A. MATS	1/	8 STANDARD PAK	24.75	
87296742	1	SHIPPED 12/11/91					24.75

CONTINUED NEXT PAGE

FEDERAL EXPRESS

BILL TO: WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030
SENDER ACTIVITY SUMMARY
INVOICE NO. 4-512-04059 ACCOUNT NO. 1568-6686-5
PAGE 3 OF 9
DATE 12/20/91

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
3338864314	SARAH CALLAHAN WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	CAROL DAVIDSON OFFICE OF GOVERNOR STATE CAPITOL OF VA RICHMOND, VA 23219 AA DELIVERED 12/12/91 11:00 SIGNED: A. RUSSELL	1/ 1	STANDARD PAK	15.50	
87296742	1	SHIPPED 12/11/91				15.50
3338864354	SARAH CALLAHAN WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	RUTH JONES OFFICE OF GOVERNOR WILDER 3 STATE CAPITOL OF VIRGINIA RICHMOND, VA 23219 AA DELIVERED 12/12/91 11:00 SIGNED: A. RUSSELL	1/ 4	PRIORITY BOX DISCOUNT	27.75 -2.50	
73354931	1	1ST ATTEMPT 12/12/91 08:54 17 DROP OFF 12/11/91				27.25
3338864406	ANTOINE WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	PRESTON DANIELS 1070 25TH ST DES MOINES, IA 50311 AA DELIVERED 12/14/91 09:48 SIGNED: P. DANIELS	1/ 1A	PRIORITY LTR SAT SERVICE	15.50 10.00	
87297136	1	SHIPPED 12/13/91				25.50

CONTINUED NEXT PAGE

FEDERAL EXPRESS

BILL TO: WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030
SENDER ACTIVITY SUMMARY
INVOICE NO. 4-512-04059 ACCOUNT NO. 1568-6686-5
PAGE 4 OF 9
DATE 12/20/91

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
3338864421	ANTOINE SMITH WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	RUTH JONES OFFICE OF THE GOVERNOR STATE CAPITAL OF VIRGINIA RICHMOND, VA 23219 AA DELIVERED 12/17/91 10:48 SIGNED: L. CORNISH	1/ 1A	PRIORITY LTR	15.50	
87299833	1	1ST ATTEMPT 12/17/91 09:21 17 SHIPPED 12/16/91				15.50
SENDER SUBTOTAL			284.25	CONTINUED NEXT PAGE		

FEDERAL EXPRESS

BILL TO: WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030
RECIPIENT ACTIVITY SUMMARY
INVOICE NO. 4-512-04059 ACCOUNT NO. 1568-6686-5
PAGE 5 OF 9
DATE 12/20/91

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
334316673	DAVIS C YOUNG 9 RANCHSTER RD BOSTON, MA 02111	JOHN BRAZZELL WILDER OF PRES COMMITTEE 30 50 CHAIN BRIDGE RD 404 FAIRFAX, VA 22030 AA DELIVERED 12/03/91 10:21 SIGNED: L. ADEAS	1/ 1	PRIORITY PAK DISCOUNT	22.50 -2.50	
55403973	1	DROP OFF 12/02/91				20.00
7838821631	PAUL HEWITT NATIONAL TAXPAYERS UNION 715 MARYLAND AVE NE WASHINGTON, DC 20002 02	PAUL GOLDMAN VA DEMO PARTY 13209 FOREST LIGHT CT RICHMOND, VA 23233 AA DELIVERED 12/11/91 09:24 SIGNED: 497470	1/ 2	PRIORITY PAK	24.25	
85499002	1	SHIPPED 12/10/91				24.25
604082010	JEREMY WILEY SCHUMER, CHARLES, CONGRESSMAN 3412 RAIFURNH BOOM 2412 WASHINGTON, DC 20515	GLEN DAVIDSON OFFICE OF THE GOVERNOR 380 FL STATE CAPITOL BLDG RICHMOND, VA 23219 AA DELIVERED 12/13/91 10:45 SIGNED: P. SORRENTINO	1/ 2	PRIORITY PAK	24.25	
72861213	1	1ST ATTEMPT 12/13/91 09:03 17 SHIPPED 12/12/91				24.25

CONTINUED NEXT PAGE

9 5 0 7 0 1 9 2 1 8

604082010	JEREMY WILEY SCUMMER, CHARLES, CONGRESSMAN 2412 BALBOAH ROAD 2412 WASHINGTON, DC 20515 1ST ATTEMPT 12/13/91 09:03 17 22861213 1 SHIPPED 12/12/91	GLENN DAVIDSON OFFICE OF THE GOVERNOR 3RD FL STATE CAPITOL BLDG RICHMOND, VA 23219 AA DELIVERED 12/13/91 10:45 SIGNED: F. SORRENTINO	1/ 2	PRIORITY FAX	24.25	24.25
						CONTINUED NEXT PAGE

FEDERAL EXPRESS

BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

RECIPIENT ACTIVITY SUMMARY

INVOICE NO. 4-512-04059 ACCOUNT NO. 1548-6686-5

PAGE 6 OF 9
DATE 12/20/91

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
7185822265 87157442 1	RUTH H JONES GOVERNOR'S OFFICE STATE CAPITOL RICHMOND, VA 23219	INDIA ADEAS WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD STE 404 FAIRFAX, VA 22030 AA DELIVERED 12/13/91 10:21 SIGNED: I. ADEAS	1/ NA	PRIORITY LTR DISCOUNT	15.50 -2.50	13.00
7185822276 87157442 1	RUTH H JONES GOVERNOR'S OFFICE STATE CAPITOL RICHMOND, VA 23219	HANE BELLEY WILDER FOR PRESIDENT 118 N MAIN ST CONCORD, NH 03301 AA DELIVERED 12/13/91 09:09 SIGNED: H. EASTMAN	1/ NA	PRIORITY LTR DISCOUNT	15.50 -2.50	13.00
1728459170 84627896 1	IONA DEMOCRATIC PARTY 2116 GRAND AVENUE RED SPRING, IA 50312 1ST ATTEMPT 12/14/91 08:53 03 SHIPPED 12/13/91	JARAH COLLAMER SUEVA VISTA PALACE WILDR FOR 1900 SUEVA VISTA ORLANDO, FL 32830 AA DELIVERED 12/14/91 09:10 SIGNED: L. RATES	1/ 5	PRIORITY BOX SAT SERVICE ADDRESS CORR	52.50 10.00 5.00	47.50
RECIPIENT SUBTOTAL			142.00	CONTINUED NEXT PAGE		

95070192719

FEDERAL EXPRESS

BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

THIRD PARTY ACTIVITY SUMMARY

INVOICE NO. 4-512-04059 ACCOUNT NO. 1548-6686-5

PAGE 7 OF 9
DATE 12/20/91

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
3096602014 87153360 1	RUTH JONES GOVERNOR'S OFFICE STATE CAPITOL RICHMOND, VA 23219	INDIA ADEAS WILDER FOR PRESIDENT STE 404 3050 CHAINBRIDGE RD FAIRFAX, VA 22030 AA DELIVERED 12/03/91 10:21 SIGNED: I. ADEAS	1/ NA	PRIORITY LTR	15.50	15.50
3096602034 78409026 1	BILL KEOUGH GOVERNOR'S OFFICE STATE CAPITOL RICHMOND, VA 23219	THE HOW BEN MCGEE 91 MARSHBRO COVE MARION, AR 72344 AA DELIVERED 12/04/91 09:20 SIGNED: B. MCGEE	1/ NA	PRIORITY LTR	15.50	15.50
THIRD PARTY SUBTOTAL			31.00	PAY THIS AMOUNT 457.25		

FEDERAL EXPRESS

BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

ACTIVITY SUMMARY

INVOICE NO. 4-512-04059 ACCOUNT NO. 1548-6686-5

PAGE 8 OF 9
DATE 12/20/91

* FEDEX HAS AUDITED THIS AIRBILL FOR CORRECT PIECES, WEIGHT, AND SERVICE. ANY CHANGES MADE ARE REFLECTED IN THE INVOICE AMOUNT.

ATTACHMENT 6

Page 85 of 122



BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

ACTIVITY SUMMARY

PAGE 9 OF 9
DATE 12/20/91
INVOICE NO. 4-512-04059 ACCOUNT NO. 1568-6686-5

FEDERAL EXPRESS PACKAGE DELIVERY STATUS CODES:

- | | | | |
|----|----------------------------------|----|---------------------------------|
| 02 | RELEASE SIGNATURE ON FILE | 03 | INCORRECT RECIPIENT ADDRESS |
| 08 | RECIPIENT NOT IN/BUSINESS CLOSED | 17 | A FUTURE DELIVERY WAS REQUESTED |

95070192



REMITTANCE ADVICE

PAYMENT DUE IN 15 DAYS

1568-6686-5 4-493-12332 11/30/91
ACCOUNT NUMBER INVOICE NUMBER DATE

ADDRESS CORRECTIONS*
CALL: 800-822-1111
7AM - 8PM CST

17.00
AMOUNT DUE

1
AIRBILLS

1568668644931233295000170048

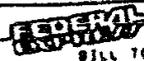
DO NOT STAPLE OR PAPER CLIP

TO INSURE PROPER CREDIT, PLEASE RETURN
THIS DOCUMENT WITH YOUR REMITTANCE

00067***** CAR-RT SORT ** (87)
WILDER FOR PRESIDENT
S2
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030-2834

MAIL PAYMENT TO:
FEDERAL EXPRESS CORP
PO BOX 1140 DEPT 8
MEMPHIS, TN 38101-1140

050701291



THIRD PARTY ACTIVITY SUMMARY

PAGE 1 OF 1
DATE 11/30/91

BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

INVOICE NO. 4-493-12332 ACCOUNT NO. 1568-6686-5

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
3519249366	MICHAEL EASTMAN WILDER FOR PRESIDENT 120 W MAIN ST CONCORD, NH 03301	J P STEPHEN IOWA DEMOCRATIC PARTY 2116 GRAND AVE DES MOINES, IA 50312 AA DELIVERED 11/21/91 08:53 SIGNED: W. SCHAFER	1/ 5	STANDARD FEE DISCOUNT	19.50 -2.50	17.00
24881250	DROP OFF 11/20/91					
THIRD PARTY SUBTOTAL			17.00	PAY THIS AMOUNT		17.00



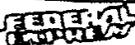
REMITTANCE ADVICE

PAYMENT DUE IN 15 DAYS

SENDER SUBTOTAL

114.30

CONTINUED NEXT PAGE



BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

THIRD PARTY ACTIVITY SUMMARY

INVOICE NO. 4-524-59068 ACCOUNT NO. 1568-6686-5
PAGE 3 OF 5
DATE 01/04/92

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
3494662113	NAME REILEX WILDER FOR PRESIDENT 120 N MAIN ST CONCORD MA 03301	JUDY JARVIS 111 CHILTON ST CAMBRIDGE, MA 02138 AA	1/ NA	PRIORITY LTR	15.50	
75943485	1ST ATTEMPT 12/18/91 10:17 AM SHIPPED 12/17/91	DELIVERED 12/18/91 11:51 SIGNED: 306341				15.50
THIRD PARTY SUBTOTAL			15.50	PAY THIS AMOUNT		130.00



BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

ACTIVITY SUMMARY

INVOICE NO. 4-524-59068 ACCOUNT NO. 1568-6686-5
PAGE 4 OF 5
DATE 01/04/92

FEDX HAS AUDITED THIS AIRBILL FOR CORRECT PIECES, WEIGHT, AND SERVICE. ANY CHANGES MADE ARE REFLECTED IN THE INVOICE AMOUNT.

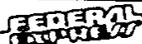


BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

ACTIVITY SUMMARY

INVOICE NO. 4-524-59068 ACCOUNT NO. 1568-6686-5
PAGE 5 OF 5
DATE 01/04/92

FEDERAL EXPRESS PACKAGE DELIVERY STATUS CODES:
04 SHIPMENT DELIVERED TO ADDRESS OTHER THAN RECIPIENT'S
06 RECIPIENT NOT IN/BUSINESS CLOSED



SENDER ACCOUNT
1568-6686-5

SHIP DATE
12/23/91

AIRBILL
NUMBER
3338864454

INVOICE ATTACHMENT
NUMB Page 89 of 182
4-524-59068

FROM E. K. EASTER

TO BEVERLY W. HAMILTON

95070192723

FEDERAL EXPRESS

SENDER ACCOUNT
1568-6686-5

SHIP DATE
12/23/91

AIRBILL
NUMBER
3338864454

INVOICE
NUMBER
4-524-59068

FROM E K EASTER WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030				TO BEVERLY M HAMILTON SM CO 8411 SABER CREEK TRAIL AUSTIN, TX 78759 AA		SERVICE	CHARGES
PAYMENT 1 BILL SHIPPER				73269976		PRIORITY PKG	40.00
SERVICE/HANDLING	PCS	WGT	VALUE \$	DIMENSIONAL SHIPMENT. CHARGEABLE WEIGHT: 21 LBS. CHARGEABLE WEIGHT IS BASED ON DIMENSIONS OF 15" X 10" X 14" DIVIDED BY 196.		DISCOUNT	-2.50
01 PRIORITY PKG	1	13	500	DELIVERED: 12/24/91 10:20		DECLARED VALU	5.50
02 DELIVER				SIGNED: B. HAMILTON			
3 DROPPED OFF	1	13	500			NET DUE	40.00

FEDERAL EXPRESS

REMITTANCE ADVICE

PAYMENT DUE IN 15 DAYS

95070192.24



REMITTANCE ADVICE

PAYMENT DUE IN 15 DAYS

1529-5072-1 4-474-28334 11/08/91
ACCOUNT NUMBER INVOICE NUMBER DATE

ADDRESS CORRECTIONST
CALL: 800-822-1147
7AM - 6PM CST

436.00
AMOUNT DUE

34
AIRBILLS

1529507244742833404004340018

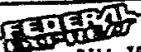
DO NOT STAPLE OR PAPER CLIP

TO INSURE PROPER CREDIT, PLEASE RETURN
THIS DOCUMENT WITH YOUR REMITTANCE

WILDER FOR PRESIDENT
MELISSA BLACK 82
PO BOX 25033
ALEXANDRIA, VA 22313-5033

MAIL PAYMENT TO:
FEDERAL EXPRESS COMP
PO BOX 1140 DEPT A
MEMPHIS, TN 38101-1140

4-2



SENDER ACTIVITY SUMMARY

PAGE 1 OF 14
DATE 11/08/91

BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

INVOICE NO. 4-474-28334 ACCOUNT NO. 1529-5072-1

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
29C6681812 58363686 1	MARK WARNER WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030 1ST ATTEMPT 10/26/91 14:41 08 DROPPED OFF 10/23/91	GARY H GEORGE 2122 W CAPITOL MILWAUKEE, WI 53206 AA DELIVERED 10/30/91 13:18 SIGNED: R. WONES	1/ NA	STANDARD LTR DISCOUNT ADDRESS CORR	11.50 -2.50 3.00	14.00
29C6681823 58363686 1	MARK WARNER WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030 1ST ATTEMPT 10/26/91 09:30 14 DROPPED OFF 10/23/91	EMMANUEL PRONCLO 1825 TULIP ST NW WASHINGTON, DC 20015 AA DELIVERED 10/29/91 11:47 SIGNED: RETURN ADDRESS 10/30/91	1/ NA	STANDARD LTR DISCOUNT ADDRESS CORR	11.50 -2.50 3.00	14.00
3452348910 58363686 1	MARK WARNER WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030 1ST ATTEMPT 10/26/91 14:18 03 DROPPED OFF 10/23/91	MR RAYMOND JOHNSON 316 W 2ND ST STE 1204 LOS ANGELES, CA 90012 AA DELIVERED 10/30/91 12:04 SIGNED: A. STEWART	1/ NA	STANDARD LTR DISCOUNT	11.50 -2.50	9.00

CONTINUED NEXT PAGE



SENDER ACTIVITY SUMMARY

PAGE 2 OF 14
DATE 11/08/91

BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

INVOICE NO. 4-474-28334 ACCOUNT NO. 1529-5072-1

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
3096808534 87401860 1	SARAH CALLANAN WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030 SHIPPED 10/29/91	MARIE BEILLY HOLIDAY INN CENTER OF W W 700 ELM ST MANCHESTER, NH 03101 AA DELIVERED 10/30/91 08:47 SIGNED: J. PENEUS	1/ 35	PRIORITY PKG	65.00	65.00
3096808540 87401860 1	SARAH CALLANAN WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030 SHIPPED 10/29/91	ATTN PAULA 1100 CONNECTICUT AVE NW RM 90 WASHINGTON, DC 20036 AA DELIVERED 10/30/91 12:23 SIGNED: S. THORNTON	1/ 1	STANDARD PAK	15.50	15.50
3096808551 87401860 1	WILDER FOR PRESIDENT WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030 SHIPPED 10/29/91	MRS PATRICIA KLUTE 252 E HIGH ST CHARLOTTESVILLE, VA 22901 AA DELIVERED 10/30/91 13:50 SIGNED: J. BEIER	1/ 1	STANDARD PAK	15.50	15.50

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ATTACHMENT 6

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SENDER ACTIVITY SUMMARY

PAGE 3 OF 14
DATE 11/08/91

WILDER FOR PRESIDENT

INVOICE NO. 4-474-28334 ACCOUNT NO. 1529-5072-1

87401890	1	FAIRFAX, SHIPPED 10/29/91	VA 22030	CHARLOTTESVILLE, VA 22901 AN DELIVERED 10/30/91 13:50 SIGNED: J. BEIER				15.50
								CONTINUED NEXT PAGE

FEDERAL EXPRESS

BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

SENDER ACTIVITY SUMMARY

PAGE 3 OF 14
DATE 11/08/91
INVOICE NO. 4-474-28334 ACCOUNT NO. 1529-5072-1

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES	
3652348814	NAEE REILEY WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	MR PAUL GOLDMAN CHAIRMAN OF DEMOCRATIC PARTY T 13209 FOREST LIGHT COURT RICHMOND, VA 23233 AA DELIVERED 10/30/91 10:18 SIGNED: 497478	1/ 1	PRIORITY PAK DISCOUNT	22.50 -2.50		
88570436	1	PROP OFF 10/29/91				20.00	
3652348836	NAEE REILEY WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	KATHY LASH CONGRESSWOMAN MORGAN 1523 LONGWORTH BLDG WASHINGTON, DC 20515 AA DELIVERED 10/30/91 09:31 SIGNED: K. HULL	1/ 1	PRIORITY PAK DISCOUNT	22.50 -2.50		
88570436	1	PROP OFF 10/29/91				20.00	
3652348848	NAEE REILEY WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	MS CAMBER FOSTER KENNETH SCHOOL-HARVARD 79 KENNEDY ST CAMBRIDGE, MA 02138 AA DELIVERED 10/30/91 10:07 SIGNED: E. GRAY	1/ NA	PRIORITY LTR DISCOUNT	15.50 -2.50		
88570436	1	PROP OFF 10/29/91				13.00	
CONTINUED NEXT PAGE							

0507019205

FEDERAL EXPRESS

BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

SENDER ACTIVITY SUMMARY

PAGE 4 OF 14
DATE 11/08/91
INVOICE NO. 4-474-28334 ACCOUNT NO. 1529-5072-1

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES	
3621519193	SARAH CALLAHAN WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	CAROL DAVIDSON THE OFFICE OF GOVERNOR WILDER STATE HOUSE OF VIRGINIA-8000 RICHMOND, VA 23219 AA DELIVERED 10/31/91 12:51 SIGNED: M. GOSNER	1/ 2	STANDARD PAK	16.50		
87402523	1	SHIPPED 10/30/91				16.50	
3621519204	SARAH CALLAHAN WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	CAROL DAVIDSON OFFICE OF GOVERNOR WILDER 3 STATE CAPITOL OF VIRGINIA RICHMOND, VA 23219 AA DELIVERED 10/31/91 09:59 SIGNED: T. HICKEY	1/ 40	PRIORITY PKG	83.75		
87402523	1	SHIPPED 10/30/91				83.75	
3621519276	NICHOLS PERRINS WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	MR DON GRAVES GRAVES MALEY & MOTTALIN 1422 EUCLID AVE CLEVELAND, OH 44115 AA DELIVERED 10/31/91 10:20 SIGNED: WLS	1/ NA	STANDARD LTR	11.50		
87402523	1	SHIPPED 10/30/91				11.50	
CONTINUED NEXT PAGE							

FEDERAL EXPRESS

BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

SENDER ACTIVITY SUMMARY

PAGE 5 OF 14
DATE 11/08/91
INVOICE NO. 4-474-28334 ACCOUNT NO. 1529-5072-1

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES	
3509160896	FREDERICK S HUMPHRIES JR WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	JOE JOHNSON ILLEGIBLE 3050 CHAINBRIDGE RD FAIRFAX, VA 22030 AA DELIVERED 11/04/91 10:10 SIGNED: A. SMITH	1/ NA	PRIORITY LTR DISCOUNT	15.50 -2.50		
51741196	1	PROP OFF 11/02/91				13.00	
3207165586	LEON A DEATHWAITS WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	WILDER FOR PRESIDENT ATTN JOHN BRAZELL 3050 CHAIN BRIDGE STE 404 FAIRFAX, VA 22030 AA DELIVERED 11/05/91 09:33 SIGNED: L. AMES	1/ NA	PRIORITY LTR DISCOUNT	15.50 -2.50		
55607075	1	PROP OFF 11/04/91				13.00	
3207163715	DAVID C YOUNG WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	JOHN BRAZELL WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD STE 404 FAIRFAX, VA 22030 AA DELIVERED 11/05/91 10:40 SIGNED: A. SMITH	1/ NA	STANDARD LTR DISCOUNT	11.50 -2.50		
55607075	1	PROP OFF 11/04/91				9.00	
CONTINUED NEXT PAGE							

ATTACHMENT
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FEDERAL EXPRESS

BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

SENDER ACTIVITY SUMMARY

PAGE 6 OF 14
DATE 11/08/91
INVOICE NO. 4-474-28334 ACCOUNT NO. 1529-5072-1

TRACKING NOS	SENDER'S NAME	RECIPIENT INFORMATION AND	PACKAGES	NET



BILL TO: WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030 SENDER ACTIVITY SUMMARY INVOICE NO. 4-474-28334 ACCOUNT NO. 1529-5072-1 PAGE 4 OF 08 DATE 11/08/91

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
3262770184	HARVEY L COLLIER JR WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	JOHN BRAZZELL WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD STE 404 FAIRFAX, VA 22030 AA DELIVERED 11/05/91 10:25 SIGNED: A.SMITH	1/ NA	PRIORITY LTR DISCOUNT	15.50 -2.50	
86602321	1 DROP OFF 11/04/91					13.00
3421519206	INDIA ADEAS WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	CAROL DAVIDSON OFFICE OF THE GOVERNOR STATE CAPITAL OF VIRGINIA RICHMOND, VA 23219 AA DELIVERED 11/05/91 10:16 SIGNED: M.GEORGE	1/ 2	PRIORITY PAK	24.25	
87303073	1 SHIPPED 11/04/91					24.25
SENDER SUBTOTAL			370.00	CONTINUED NEXT PAGE		



BILL TO: WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030 RECIPIENT ACTIVITY SUMMARY INVOICE NO. 4-474-28334 ACCOUNT NO. 1529-5072-1 PAGE 7 OF 24 DATE 11/08/91

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
7185821834	BETH JONES STATE CAPITOL RICHMOND, VA 23219	INDIANA ADEAS WILDER FOR PRESIDENT STE 404 3050 CHAIN BRIDGE ROAD FAIRFAX, VA 22030 AA DELIVERED 10/29/91 10:15 SIGNED: A.SMITH	1/ NA	PRIORITY LTR DISCOUNT	15.50 -2.50	
87167804	1 DROP OFF 10/28/91					13.00
9652233264	MAY H FOX 8420 ROSELAWN ROAD RICHMOND, VA 23224	JOHN BRAZZELL WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD STE 404 FAIRFAX, VA 22030 AA DELIVERED 10/30/91 10:15 SIGNED: A.SMITH	1/ NA	PRIORITY LTR	15.50	
74004803	1 SHIPPED 10/29/91					15.50
1513571276	AL HERRON CENTURY 21/JULIUS STERNES 7010 S POLK DALLAS, TX 75232	JOHN BRAZZELL 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030 AA DELIVERED 11/01/91 10:22 SIGNED: A.SMITH	1/ NA	PRIORITY LTR	15.50	
75352071	1 SHIPPED 10/31/91					15.50
			CONTINUED NEXT PAGE			



BILL TO: WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030 RECIPIENT ACTIVITY SUMMARY INVOICE NO. 4-474-28334 ACCOUNT NO. 1529-5072-1 PAGE 8 OF 14 DATE 11/08/91

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
6619860796	EVELYN THETFORD S R NOJBAK & ASSOC INC 200 S BROAD ST STE 850 PHILADELPHIA, PA 19102	NICHOLAS PERRINE WILDER FOR PRESIDENT COMMITTEE 3050 CHAIN BRIDGE RD STE 404 FAIRFAX, VA 22030 AA DELIVERED 11/01/91 10:22 SIGNED: A.SMITH	1/ NA	PRIORITY LTR DISCOUNT	15.50 -2.50	
89761055	1 DROP OFF 10/31/91					13.00
7716914800	LLOYD OXFORD BLACK UNITED FUND 50 PARK PLACE STE 1410 NEWARK, NJ 07102	MR JOHN BRAZZELL WILDER FOR PRESIDENT COMMITTEE 3050 CHAIN BRIDGE RD STE 404 FAIRFAX, VA 22030 AA DELIVERED 11/01/91 10:22 SIGNED: A.SMITH	1/ NA	PRIORITY LTR DISCOUNT	15.50 -2.50	
24677601	1 DROP OFF 10/31/91					13.00
791808173	BETH JONES STATE CAPITOL RICHMOND, VA 23219	INDIANA ADEAS WILDER FOR PRESIDENT STE 404 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030 AA DELIVERED 11/01/91 10:22 SIGNED: A.SMITH	1/ NA	PRIORITY LTR DISCOUNT	15.50 -2.50	
24186923	1 DROP OFF 10/31/91					13.00
			CONTINUED NEXT PAGE			

ATTACHMENT 6
Page 99 of 120



BILL TO: WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030 RECIPIENT ACTIVITY SUMMARY INVOICE NO. 4-474-28334 ACCOUNT NO. 1529-5072-1 PAGE 9 OF 14 DATE 11/08/91

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES

7941808173	RUTH JONES STATE CAPITOL RICHMOND, VA 23219	INDIAN AGES WILDER FOR PRESIDENT STE 404 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030 AA DELIVERED 11/01/91 10:22 SIGNED: A. SMITH	1/ NA	PRIORITY LTR DISCOUNT	15.50 -2.50	13.00
2418-4-23	1	DROP OFF 10/31/91				
						CONTINUED NEXT PAGE

FEDERAL EXPRESS

BILL TO: WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030
 RECIPIENT ACTIVITY SUMMARY
 INVOICE NO. 4-474-28334 ACCOUNT NO. 1529-5072-1
 PAGE 9 OF 14
 DATE 11/08/91

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
9049485094	JOHN H LAWRENCE J H LAWRENCE AND COMPANY 185 WALTON STREET NW ATLANTA, GA 30303	MR BENJAMIN BROWN CORPORATION FOR EMPLOYMENT 657 BELVEDERE AVE PLAINFIELD, NJ 07062 AA DELIVERED 11/01/91 10:42 SIGNED: J LAWRENCE	1/ NA	PRIORITY LTR	15.50	
89404484	1	SHIPPED 10/31/91				15.50
440312818	ARNOLD W WELCH JR 101 W 11TH STREET STE 910 KANSAS CITY, MO 64105	JOHN BRAZZELL WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD STE 404 FAIRFAX, VA 22030 AA DELIVERED 11/02/91 11:54 SIGNED: J. STURGELL	1/ NA	PRIORITY LTR DISCOUNT SAT SERVICE	15.50 -2.50 10.00	
91540853	1	DROP OFF 11/01/91				23.00
7631169313	ROBERT B WEINTRAUB 401 E 74TH ST NEW YORK, NY 10021	JOHN BRAZZELL WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD 404 FAIRFAX, VA 22030 AA DELIVERED 11/04/91 10:18 SIGNED: A. SMITH	1/ NA	PRIORITY LTR	15.50	
ROBERT B WEI NTRAUB 8116504	1	SHIPPED 11/01/91				15.50
						CONTINUED NEXT PAGE

FEDERAL EXPRESS

BILL TO: WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030
 RECIPIENT ACTIVITY SUMMARY
 INVOICE NO. 4-474-28334 ACCOUNT NO. 1529-5072-1
 PAGE 10 OF 14
 DATE 11/08/91

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
010936605	J L CHESTNUT JR CHESTNUT SARGERS & TURNER 1405 JEFF DAVIS AVE SELMA, AL 36701	JOHN BRAZZELL WILDER FOR CAMPAIGN SUITE 404 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030 AA DELIVERED 11/05/91 10:25 SIGNED: A. SMITH	1/ NA	PRIORITY LTR	15.50	
45420115	1	SHIPPED 11/04/91				15.50
852404981	CHRISTOPHER R SMITH SMITH PARTNERSHIP, THE 3910 LINDELL BLVD SAINT LOUIS, MO 63108	WILDER FOR PRESIDENT 3050 CHAIN BRIDGE ROAD STE 404 FAIRFAX, VA 22030 AA DELIVERED 11/05/91 09:33 SIGNED: J. AMES	1/ NA	PRIORITY LTR	15.50	
94017384	1	SHIPPED 11/04/91				15.50
875735C930	CHARLES F HEAFEE CHARLES HEAFEE ARCHITECT 2800 N GROVE WICHITA, KS 67219	JOHN BRAZZELL WILDER FINANCE CHAIRMAN 3050 CHAIN BRIDGE ROAD STE 404 FAIRFAX, VA 22030 AA DELIVERED 11/05/91 10:25 SIGNED: A. SMITH	1/ NA	PRIORITY LTR DISCOUNT	15.50 -2.50	
73463484	1	DROP OFF 11/04/91				13.00
RECIPIENT SUBTOTAL			101.00	CONTINUED NEXT PAGE		

FEDERAL EXPRESS

BILL TO: WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030
 THIRD PARTY ACTIVITY SUMMARY
 INVOICE NO. 4-474-28334 ACCOUNT NO. 1529-5072-1
 PAGE 11 OF 14
 DATE 11/08/91

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
7185821845	RUTH JONES STATE CAPITOL RICHMOND, VA 23219	THE GORMAN GROUP 2015 MASSACHUSETTS AVE N W WASHINGTON, DC 20034 AA DELIVERED 10/26/91 10:25 SIGNED: L. YONANNES	1/ NA	PRIORITY LTR DISCOUNT SAT SERVICE	15.50 -2.50 10.00	
73431186	1	DROP OFF 10/25/91				23.00
7941807974	RUTH JONES STATE CAPITOL RICHMOND, VA 23219	NATCO 7522-A FULLERTON RD SPRINGFIELD, VA 22153 AA DELIVERED 10/26/91 10:09 SIGNED: P. BURKE	1/ NA	PRIORITY LTR DISCOUNT SAT SERVICE	15.50 -2.50 10.00	
73431186	1	DROP OFF 10/25/91				23.00
7185821893	RUTH H JONES GOVERNORS OFFICE STATE CAPITOL RICHMOND, VA 23219	MS R BLACK 201 W UNION STREET LOVETTSVILLE, VA 22080 PM DELIVERED 10/30/91 10:14 SIGNED: R. WALSH	1/ NA	PRIORITY LTR DISCOUNT	15.50 -2.50	
87167740	1	DROP OFF 10/29/91				13.00
						CONTINUED NEXT PAGE

ATTACHMENT

FEDERAL EXPRESS

87147763	STATE CAPITOL RICHMOND, VA 23219	201 N UNION STREET LOVETTYSVILLE, VA 22080 PH DELIVERED 10/30/91 10:14 SIGNED: R.WALSH	13.00
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CONTINUED NEXT PAGE



BILL TO: WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030
 THIRD PARTY ACTIVITY SUMMARY
 PAGE 12 OF 14
 DATE 11/08/91
 INVOICE NO. 4-474-28334 ACCOUNT NO. 1529-5072-1

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
7941808162	RUTH JONES STATE CAPITOL RICHMOND, VA 23219	JANE REILLY HOLIDAY INN 700 ELM ST MANCHESTER NH 03101 AA DELIVERED 10/31/91 09:17 SIGNED: M.WITTS	1/ NA	PRIORITY LTR DISCOUNT	15.50 -2.50	
24184934	1 DROP OFF 10/30/91					13.00
7941808184	RUTH JONES STATE CAPITOL RICHMOND, VA 23219	PAULA MURRAY O C S C RM 1500 183 FRANKLIN ST BOSTON, MA 02107 AA DELIVERED 10/31/91 09:11 SIGNED: R.WICKERSON	1/ NA	PRIORITY LTR DISCOUNT	15.50 -2.50	
24184934	1 DROP OFF 10/30/91					13.00
THIRD PARTY SUBTOTAL			85.00	PAY THIS AMOUNT	636.00	

9507019209



BILL TO: WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030
 ACTIVITY SUMMARY
 PAGE 13 OF 14
 DATE 11/08/91
 INVOICE NO. 4-474-28334 ACCOUNT NO. 1529-5072-1

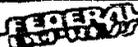
FEDERATED HAS AUDITED THIS AIRBILL FOR CORRECT PIECES, WEIGHT, AND SERVICE. ANY CHARGES MADE ARE REFLECTED IN THE INVOICE AMOUNT.



BILL TO: WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030
 ACTIVITY SUMMARY
 PAGE 14 OF 14
 DATE 11/08/91
 INVOICE NO. 4-474-28334 ACCOUNT NO. 1529-5072-1

FEDERAL EXPRESS PACKAGE DELIVERY STATUS CODES:

02	RELEASE SIGNATURE ON FILE	08	RECIPIENT NOT IN/BUSINESS CLOSED
14	SHIPMENT RETURNED TO SENDER		



REMITTANCE ADVICE

PAYMENT DUE IN 15 DAYS

1529-5072-1 4-493-62902 11/30/91
ACCOUNT NUMBER INVOICE NUMBER DATE

ADDRESS CORRECTIONS:
CALL: 800-622-1147
FAX - 6PM CST

58.75 1
AMOUNT DUE AIRBILLS

1529507264936290262000587504

DO NOT STAPLE OR PAPER CLIP

TO INSURE PROPER CREDIT, PLEASE RETURN
THIS DOCUMENT WITH YOUR REMITTANCE

10050..... 5-RIGIT 22313
WILDER FOR PRESIDENT
MELISSA BLACK 32
PO BOX 25033
ALEXANDRIA, VA 22313-5033

MAIL PAYMENT TO:
FEDERAL EXPRESS CORP
PO BOX 1140 DEPT A
MEMPHIS, TN 38101-1140



BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

SENDER ACTIVITY SUMMARY

PAGE 1 OF 1

DATE 11/30/91

INVOICE NO. 4-493-62902 ACCOUNT NO. 1529-5072-1

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
3621519591	ANTOINE SMITH WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	CAROL DAVIDSON OFFICE OF THE GOVERNOR STATE CAPITAL OF VIRGINIA RICHMOND, VA 23219 AA DELIVERED 11/20/91 09:32 SIGNED: T. RICEY	1/ 20	PRIORITY BOX	58.75	
65919083	1 SHIPPED 11/19/91					58.75
SENDER SUBTOTAL			58.75	PAY THIS AMOUNT	58.75	



REMITTANCE ADVICE

PAYMENT DUE IN 15 DAYS

1002-3276-6 4-493-62903 11/30/91

ADDRESS CORRECTIONS:
CALL: 800-622-1147

33.25 3

FEDERAL EXPRESS

REMITTANCE ADVICE

PAYMENT DUE IN 15 DAYS

1568-6686-5 4-518-84727 12/28/91
ACCOUNT NUMBER INVOICE NUMBER DATE

ADDRESS CORRECTIONS?
CALL: 800-822-1147
7AM - 6PM CST

205.00 9
AMOUNT DUE AIRBILLS

1568668645188472745002050055

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00066***** CAR-BY SORT ** CR71
WILDER FOR PRESIDENT
82
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030-2834

MAIL PAYMENT TO:
FEDERAL EXPRESS CORP
PO BOX 1140 DEPT 8
MEMPHIS, TN 38101-1140

FEDERAL EXPRESS

BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

SENDER ACTIVITY SUMMARY

PAGE 1 OF 5
DATE 12/28/91
INVOICE NO. 4-518-84727 ACCOUNT NO. 1568-6686-5

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
3519249333	NAME BELLEY WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	CONGRESSIONAL CREDIT UNION FE 2ND & B STREET SW WASHINGTON DC 20515 AA DELIVERED 12/16/91 06:01 SIGNED: L.BEATO	1/ NA	PRIORITY LTR INVAL ACCTP	15.50 5.00	
58551146	1 SHIPPED 12/13/91					20.50
3338864410	ERIC EASTER WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	KEVIN GIBBS EPIC RECORDS/SONY MUSIC MAILR 666 5TH AVE NEW YORK NY 10101 AA DELIVERED 12/17/91 08:49 SIGNED: B.BROWN	1/ 26	PRIORITY PKG DISCOUNT	86.75 -2.50	
87114930	1 DROP OFF 12/16/91					63.75
3338864351	SRAM CALLAHAN WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	CAROL DAVIDSON OFFICE OF GOVERNOR WILDER 3 STATE CAPITOL OF VIRGINIA RICHMOND VA 23219 AA DELIVERED 12/18/91 12:09 SIGNED: V.EPPS	1/ NA	STANDARD LTR	11.50	
87299063	1 SHIPPED 12/17/91					11.50

CONTINUED NEXT PAGE

FEDERAL EXPRESS

BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

SENDER ACTIVITY SUMMARY

PAGE 2 OF 5
DATE 12/28/91
INVOICE NO. 4-518-84727 ACCOUNT NO. 1568-6686-5

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
3338864362	ANTOINE SMITH WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	AYESHA H HUGES 4400 SHANNONICK DR APT 280 SACRAMENTO CA 95842 AA DELIVERED 12/19/91 10:03 SIGNED: A.HUGES	1/ 1	PRIORITY BOX	22.50	
61895245	1 SHIPPED 12/18/91					22.50
3338864432	ERIC EASTER WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	SUE BOOT WORLD 190 SULLIVAN STREET NEW YORK NY 10012 AA DELIVERED 12/19/91 10:20 SIGNED: J.TANG	1/ NA	PRIORITY LTR	15.50	
87298470	1 SHIPPED 12/18/91					15.50
3621519403	JOHN BRAZZELL WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	CAROL DOAK ARNABA MOFFLER INC STE 600 860 GREENBRIER CIRCLE CHESAPEAKE VA 23320 AA DELIVERED 12/19/91 10:07 SIGNED: S.RIDDICK	1/ NA	PRIORITY LTR	15.50	
87298470	1 SHIPPED 12/18/91					15.50

CONTINUED NEXT PAGE

ATTACHMENT 6

Page 47 of 122

FEDERAL EXPRESS

BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

SENDER ACTIVITY SUMMARY

PAGE 3 OF 5
DATE 12/28/91
INVOICE NO. 4-518-84727 ACCOUNT NO. 1568-6686-5

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
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34215	JOHN BRAZELL WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	CAROL DOAK ARMADA HOPFLER INC STE 600 840 GREENBRIER CIRCLE CHESAPEAKE VA 23320 AA DELIVERED 12/19/91 10:07 SIGNED: S. RIDDICK	1/ NA PRIORITY LTR	15.50	15.50
87298470	1 SHIPPED 12/18/91				CONTINUED NEXT PAGE

FEDERAL
EXPRESS

BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

SENDER ACTIVITY SUMMARY

PAGE 3 OF 5
DATE 12/28/91

INVOICE NO. 4-518-84727 ACCOUNT NO. 1568-6688-5

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
3338844303	ERIC EASTER WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	DEBRA LANGFORD WARNER BROTHERS 4000 WARNER BLVD DURHAM, CA 91505 AA DELIVERED 12/23/91 10:00 SIGNED: B. LANGFORD	1/ 2	PRIORITY BOX DISCOUNT	24.25 -2.50	
73269954	1 DROP OFF 12/21/91					21.75
3338844373	SARAH CALLANAN WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	CAROL DAVIDSON OFFICE OF GOVERNOR WILDER 3 CAPITOL OF VIRGINIA RICHMOND VA 23219 AA DELIVERED 12/24/91 10:58 SIGNED: L. CORNISH	1/ NA	STANDARD LTR	11.50	
60779040	1 SHIPPED 12/23/91					11.50
SENDER SUBTOTAL			182.50	CONTINUED NEXT PAGE		

FEDERAL
EXPRESS

BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

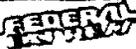
RECIPIENT ACTIVITY SUMMARY

PAGE 4 OF 5
DATE 12/28/91

INVOICE NO. 4-518-84727 ACCOUNT NO. 1568-6688-5

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
3519249355	MAHE BEILET WILDER FOR PRESIDENT 120 N MAIN STREET CONCORD, NH 03301 1ST ATTEMPT 12/11/91 09:52 17 SHIPPED 12/10/91	MS RUTH JONES OFFICE OF THE GOVERNOR STATE CAPITAL RICHMOND VA 23219 AA DELIVERED 12/11/91 10:47 SIGNED: F. SORRENTINO	1/ 1	PRIORITY PAK	22.50	
ACCOUNTING F OR ADV 3 OR 58551080	1					22.50
RECIPIENT SUBTOTAL			22.50	PAY THIS AMOUNT		205.00

9507019-2



REMITTANCE ADVICE

PAYMENT DUE IN 15 DAYS

1548-6686-5 4-505-40177 12/14/91
ACCOUNT NUMBER INVOICE NUMBER DATE

ADDRESS CORRECTIONIST
CALL: 800-622-1147
7AM - 6PM CST

258.00 13
AMOUNT DUE AIRBILLS

1568668645054017703002580049

DO NOT STAPLE OR PAPER CLIP

TO INSURE PROPER CREDIT, PLEASE RETURN
THIS DOCUMENT WITH YOUR REMITTANCE

00064***** CAN-ET SORT ** C871
WILDER FOR PRESIDENT
52
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030-2834

MAIL PAYMENT TO:
FEDERAL EXPRESS CORP
PO BOX 1148 DEPT A
MEMPHIS, TN 38101-1148



BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

SENDER ACTIVITY SUMMARY

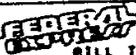
PAGE 1 OF 8

DATE 12/14/91

INVOICE NO. 4-505-40177 ACCOUNT NO. 1568-6686-5

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
3906784582	JAMES THOMPSON WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	SMILEY NINES 1016 BLAIR ST PORTSMOUTH, VA 23704 AA DELIVERED 12/04/91 10:30 SIGNED: S.NINES	1/ 3	PRIORITY BOX	27.00	
43784571	1 SHIPPED 12/04/91					27.00
3906784593	ANTOINE SMITH WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	ATTN JOHN BEAZIELL WILDER GREGORY LAW FIRM 2509 E BROAD ST RICHMOND, VA 23223 AA DELIVERED 12/05/91 09:51 SIGNED: J.CASHWELL	1/ 2	PRIORITY PEG	24.25	
85911000	1 SHIPPED 12/04/91					24.25
3171108275	ANTOINE SMITH WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	WILBUR HAWKIN 6743 W KIRBY OAKS COVE MEMPHIS, TN 38119 AA DELIVERED 12/06/91 19:27 SIGNED: W.HAWKINS	1/ 2	STANDARD BOX	16.50	
85915653	1 SHIPPED 12/05/91					16.50

CONTINUED NEXT PAGE



BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

SENDER ACTIVITY SUMMARY

PAGE 2 OF 8

DATE 12/14/91

INVOICE NO. 4-505-40177 ACCOUNT NO. 1568-6686-5

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
3906784606	ERIC EASTEN WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	JENNIFER ERICKSON SUCCESSFUL FARMING 1716 LOCUST ST DES MOINES, IA 50309 AA DELIVERED 12/06/91 09:09 SIGNED: L.WILSON	1/ BA	STANDARD LTR	11.50	
85915653	1 SHIPPED 12/05/91					11.50
3171108312	SARAH CALLANAR WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	BILL DAVIS JOINT UNION HOUSE 421 CARRINGTON ST TUPELO, MS 38801 AA PICKED UP 12/09/91 11:30 SIGNED: M.WILSON	1/ 1	STANDARD PAX DISCOUNT	15.50 -2.50	
95726153	1 SHIPPED 12/07/91					13.00
3171108323	ANTOINE TONY SMITH WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	RALPH B BRICKERS 1400 CHURCH ST HORNOLK, VA 23504 AA DELIVERED 12/11/91 12:07 SIGNED: R.BRICKERS	1/ BA	PRIORITY LTR	15.50	
85904641	1 SHIPPED 12/09/91					15.50

CONTINUED NEXT PAGE

ATTACHMENT

Page 99 of 122



BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

SENDER ACTIVITY SUMMARY

PAGE 3 OF 8

DATE 12/14/91

INVOICE NO. 4-505-40177 ACCOUNT NO. 1568-6686-5

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
3171108334	INDIA WILDER FOR PRESIDENT	RARE ALLEN CHICAGO URBAN LEAGUE	1/ BA	STANDARD LTR	11.50	

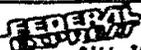


BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

SENDER ACTIVITY SUMMARY

PAGE 3 OF 8
DATE 12/16/91
INVOICE NO. 4-505-40177 ACCOUNT NO. 1568-6686-5

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
5171108334	INDIA WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	MARC ALLEN CHICAGO URBAN LEAGUE 2510 S MICHIGAN AVE CHICAGO, IL 60653 AA DELIVERED 12/10/91 14:18 SIGNED: L.JONES	1/ NA	STANDARD LTR	11.50	
85905002	1 SHIPPED 12/09/91					11.50
SENDER SUBTOTAL			119.25	CONTINUED NEXT PAGE		

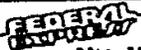


BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

RECIPIENT ACTIVITY SUMMARY

PAGE 4 OF 8
DATE 12/16/91
INVOICE NO. 4-505-40177 ACCOUNT NO. 1568-6686-5

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
3096602110	BILL KEOUGH GOVERNOR'S OFFICE STATE CAPITOL RICHMOND, VA 23219	NICHOLAS PEARINS WILDER FOR PRESIDENT STE 404 3050 CHAIN BRIDGE ROAD FAIRFAX, VA 22030 AA DELIVERED 11/22/91 10:19 SIGNED: A.SMITH	1/ NA	PRIORITY LTR	15.50	
24186315	1 SHIPPED 11/21/91					15.50
3096602025	BILL KEOUGH GOVERNOR'S OFFICE STATE CAPITOL RICHMOND, VA 23219	JOE JOHNSON WILDER FOR PRESIDENT STE 404 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030 AA DELIVERED 12/04/91 10:20 SIGNED: A.SMITH	1/ 20	PRIORITY BOX	58.75	
78409026	1 SHIPPED 12/03/91					58.75
7185822033	RUTH H JONES GOVERNOR'S OFFICE STATE CAPITOL RICHMOND, VA 23219	DEW MCCEE 91 HANDBOOKS MARION, AR 72364 AA DELIVERED 12/06/91 09:06 SIGNED: B.MCCEE	1/ NA	PRIORITY LTR DISCOUNT	15.50 -2.50	
87157700	1 DROP OFF 12/05/91					13.00
			CONTINUED NEXT PAGE			



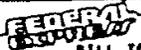
BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

RECIPIENT ACTIVITY SUMMARY

PAGE 5 OF 8
DATE 12/16/91
INVOICE NO. 4-505-40177 ACCOUNT NO. 1568-6686-5

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
7185822044	RUTH H JONES GOVERNOR'S OFFICE STATE CAPITOL RICHMOND, VA 23219	INDIA IDEAS WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD STE 404 FAIRFAX, VA 22030 AA DELIVERED 12/04/91 10:23 SIGNED: A.SMITH	1/ NA	PRIORITY LTR DISCOUNT	15.50 -2.50	
87157700	1 DROP OFF 12/05/91					13.00
RECIPIENT SUBTOTAL			100.25	CONTINUED NEXT PAGE		

ATTACHMENT 6



BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

THIRD PARTY ACTIVITY SUMMARY

PAGE 100 OF 122
PAGE 6 OF 8
DATE 12/16/91
INVOICE NO. 4-505-40177 ACCOUNT NO. 1568-6686-5

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
		MARTHA BOWLING/CATERING	1/ NA	PRIORITY LTR	15.50	

RECIPIENT SUBTOTAL

100.25

CONTINUED NEXT PAGE



BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

THIRD PARTY ACTIVITY SUMMARY

INVOICE NO. 4-505-40177 ACCOUNT NO. 1568-6486-5
PAGE 6 OF 8
DATE 12/14/91

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
3096402100	RUTH JONES GOVERNOR'S OFFICE STATE CAPITOL RICHMOND, VA 23223	MARTHA DOWNING/CATERING THE PALMER HOUSE WILTON 17 EAST MONROE STREET CHICAGO, IL 60603 AA DELIVERED 11/22/91 08:23 SIGNED: J.LAGUMAS	1/ NA	PRIORITY LTR	15.50	
24186315	1 SHIPPED 11/21/91					15.50
7834822460	PATE SEPP NATIONAL TAXPAYERS UNION 713 HARTLAND AVE NE WASHINGTON, DC 20002	PAUL GOLDMAN 13209 FOREST LIGHT CT RICHMOND, VA 23233 AA DELIVERED 12/07/91 10:46 SIGNED: 497470	1/ NA	PRIORITY LTR DISCOUNT SAT SERVICE	15.50 -2.50 10.00	
73159635	1 DROP OFF 12/06/91					13.00
THIRD PARTY SUBTOTAL			38.50	PAY THIS AMOUNT		230.00



BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

ACTIVITY SUMMARY

INVOICE NO. 4-505-40177 ACCOUNT NO. 1568-6486-5
PAGE 7 OF 8
DATE 12/14/91

FEDERATED EXPRESS

FEDERATED EXPRESS WAS AUDITED THIS SHIPMENT AND CORRECTED THE SHIP DATE TO REFLECT THE ACTUAL DATE AS SCANNED BY OUR COSMOS ELECTRONIC TRACKING SYSTEM AT THE TIME WE RECEIVED YOUR PACKAGE FOR SHIPMENT.



BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

ACTIVITY SUMMARY

INVOICE NO. 4-505-40177 ACCOUNT NO. 1568-6486-5
PAGE 8 OF 8
DATE 12/14/91

FEDERATED EXPRESS

FEDERAL EXPRESS PACKAGE DELIVERY STATUS CODES:

02	RELEASE SIGNATURE ON FILE	08	RECIPIENT NOT IN/BUSINESS CLOSED
59	SHIPMENT HELD FOR RECIPIENT PICKUP	84	DELIVERY DELAYED BY SITUATIONS BEYOND OUR CONTROL

ATTACHMENT

Page 101 of 122



HERITANCE ADVICE

PAYMENT DUE IN 15 DAYS

REMITTANCE ADVICE

PAYMENT DUE IN 15 DAYS

1508-6686-5 4-530-21610 01/10/92
ACCOUNT NUMBER INVOICE NUMBER DATE

ADDRESS CORRECTION#
CALL: 800-622-1167
7AM - 6PM CST

284.75 12
AMOUNT DUE AIRBILLS

156866865302161021002847520

DO NOT STAPLE OR PAPER CLIP

TO INSURE PROPER CREDIT, PLEASE RETURN
THIS DOCUMENT WITH YOUR REMITTANCE

00062***** CAR-BY SORT ** C871
WILDER FOR PRESIDENT
S2
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030-2834

MAIL PAYMENT TO:
FEDERAL EXPRESS CORP
PO BOX 1140 DEPT A
MEMPHIS, TN 38101-1140

0507019-27-6



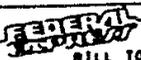
BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

SENDER ACTIVITY SUMMARY

PAGE 1 OF 7
DATE 01/10/92
INVOICE NO. 4-530-21610 ACCOUNT NO. 1568-6686-5

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
3338864465	ANTOINE WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	BERNARD STELLMAKER 300 W PEACHTREE ST ATLANTA, GA 30308-AA DELIVERED 12/31/91 18:56 SIGNED: B. STELLMAKER	1/ 50	STANDARD PKG ADDRESS CORR	77.25 5.00	
60776973	1ST ATTEMPT 12/27/91 11:58 03 1 SHIPPED 12/28/91					92.25
3338864502	ERIC EASTER WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	SUE 0007 WORLD 190 SULLIVAN ST NEW YORK, NY 10012-AA DELIVERED 01/03/92 14:37 SIGNED: S. ZBYLSKI	1/ 4	STANDARD PKG DISCOUNT	18.50 -2.50	
65021961	1 DROP OFF 01/02/92					16.00
3338864515	JOHN BRAZZELL WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	BERNIE HENDERSON 10416 HUNTSWOOD DR RICHMOND, VA 23233-AA DELIVERED 01/06/92 08:34 SIGNED: M. HENDERSON	1/ 3	PRIORITY PAC	27.00	
92896904	1 SHIPPED 01/03/92					27.00

CONTINUED NEXT PAGE



BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

SENDER ACTIVITY SUMMARY

PAGE 2 OF 7
DATE 01/10/92
INVOICE NO. 4-530-21610 ACCOUNT NO. 1568-6686-5

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
3338864524	JOHN HOTCHKISS WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	NICHOLAS PERRIS 7009 RIVERSIDE DR RICHMOND, VA 23225-AA DELIVERED 01/04/92 10:09 SIGNED: N. PERRIS	1/ NA	PRIORITY LTR SAT SERVICE	15.50 10.00	
92896904	1 SHIPPED 01/03/92					25.50
3338864502	JOE JOHNSON WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	STANLEY PROGRESS PRINTING 3324 S WALSTEAD CHICAGO, IL 60608-AA DELIVERED 01/06/92 09:08 SIGNED: G. JEFFERS	1/ NA	PRIORITY LTR SAT SERVICE	15.50 10.00	
92896296	1 SHIPPED 01/04/92					25.50
3338864535	SCOTT BATES WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	PLC WEINTRAUB 401 E 74TH ST 7-C NEW YORK, NY 10021-AA DELIVERED 01/06/92 09:27 SIGNED: J. JULIANO	1/ NA	PRIORITY LTR SAT SERVICE	15.50 10.00	
92896296	1 SHIPPED 01/04/92					25.50

CONTINUED NEXT PAGE

ATTACHMENT 6

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BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

SENDER ACTIVITY SUMMARY

PAGE 3 OF 7
DATE 01/10/92
INVOICE NO. 4-530-21610 ACCOUNT NO. 1568-6686-5



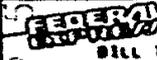
BILL TO: WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030
 SENDER ACTIVITY SUMMARY
 INVOICE NO. 4-530-21610 ACCOUNT NO. 1568-6686-5
 PAGE 3 OF 7
 DATE 01/10/92

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
3338864546	SCOTT BATES WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	MS RUTH JONES GOVERNOR'S OFFICE CAPITOL SQUARE RICHMOND, VA 23219 AA DELIVERED 01/07/92 10:30 SIGNED: L. CORNISH	1/ NA	PRIORITY LTR	15.50	
92897803	1ST ATTEMPT 01/07/92 08:18 17 SHIPPED 01/04/92					15.50
SENDER SUBTOTAL			217.25	CONTINUED NEXT PAGE		



BILL TO: WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030
 RECIPIENT ACTIVITY SUMMARY
 INVOICE NO. 4-530-21610 ACCOUNT NO. 1568-6686-5
 PAGE 4 OF 7
 DATE 01/10/92

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
3418724923	RUTH JONES GOVERNOR'S OFFICE STATE CAPITOL RICHMOND, VA 23219	INDIA AREAS WILDER FOR PRESIDENT STE 404 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030 AA DELIVERED 12/18/91 10:22 SIGNED: A. SMITH	1/ NA	PRIORITY LTR DISCOUNT	15.50 -2.50	
07157265	1 DROP OFF 12/17/91					13.00
RECIPIENT SUBTOTAL			13.00	CONTINUED NEXT PAGE		



BILL TO: WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030
 THIRD PARTY ACTIVITY SUMMARY
 INVOICE NO. 4-530-21610 ACCOUNT NO. 1568-6686-5
 PAGE 5 OF 7
 DATE 01/10/92

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
3518445954	WILDER FOR PRESIDENT MCCAIN VA JERSEY CITY, NJ 07302	MR ERNEST BONNER BONNER & BONNER 370 17TH ST-STE 3900 DENVER, CO 80202 AA DELIVERED 12/17/91 09:26 SIGNED: T. WINTROP	1/ NA	PRIORITY LTR DISCOUNT	15.50 -2.50	
47504041	1 DROP OFF 12/16/91					13.00
3418725155	BILL KEOUGH GOVERNOR'S OFFICE STATE CAPITOL RICHMOND, VA 23219	NAME REILEY WILDER FOR PRESIDENT 120 N MAIN ST CONCORD, NH 03301 AA DELIVERED 12/18/91 09:44 SIGNED: M. EASTMAN	1/ NA	PRIORITY LTR	15.50	
07154723	1 SHIPPED 12/17/91					15.50
3418725122	RUTH JONES GOVERNOR'S OFFICE STATE CAPITOL RICHMOND, VA 23219	INDIA AREAS WILDER FOR PRESIDENT ST 404 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030 AA DELIVERED 12/20/91 10:54 SIGNED: J. THOMPSON	1/ NA	PRIORITY LTR DISCOUNT	15.50 -2.50	
07157151	1 DROP OFF 12/19/91					13.00
			CONTINUED NEXT PAGE			

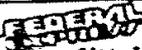
ATTACHMENT

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BILL TO: WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030
 THIRD PARTY ACTIVITY SUMMARY
 INVOICE NO. 4-530-21610 ACCOUNT NO. 1568-6686-5
 PAGE 6 OF 7
 DATE 01/10/92

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES



BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

THIRD PARTY ACTIVITY SUMMARY

PAGE 6 OF 7
DATE 01/10/92
INVOICE NO. 4-530-21610 ACCOUNT NO. 1568-6686-5

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
3418725144	RUTH JONES GOVERNOR'S OFFICE STATE CAPITOL RICHMOND, VA 23219	CHERYL LOSSER 1710 H STREET NW 3 WASHINGTON, DC 20009 AA DELIVERED 12/20/91 10:17 SIGNED: S.LOSSER	1/ MA	PRIORITY LTR DISCOUNT	15.50 -2.50	
87157151	DROP OFF 12/19/91					13.00
THIRD PARTY SUBTOTAL			54.50	PAY THIS AMOUNT		284.75



BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

ACTIVITY SUMMARY

PAGE 7 OF 7
DATE 01/10/92
INVOICE NO. 4-530-21610 ACCOUNT NO. 1568-6686-5

FEDERAL EXPRESS PACKAGE DELIVERY STATUS CODES:	
03	INCORRECT RECIPIENT ADDRESS
17	A FUTURE DELIVERY WAS REQUESTED



REMITTANCE ADVICE

PAYMENT DUE IN 15 DAYS

RECIPIENT TOTAL 30.50 PAY THIS AMOUNT 89.25

FEDERAL EXPRESS

REMITTANCE ADVICE

PAYMENT DUE IN 15 DAYS

1568-6686-5 4-499-09607 12/04/91
 ACCOUNT NUMBER INVOICE NUMBER DATE

ADDRESS CORRECTIONS?
 CALL: 800-622-1547
 7AM - 6PM EST

372.75 15
 AMOUNT DUE AIRBILLS

1568668644990960735003727552

DO NOT STAPLE OR PAPER CLIP

TO INSURE PROPER CREDIT, PLEASE RETURN THIS DOCUMENT WITH YOUR REMITTANCE

00064***** CAR-BY SORT ** CR71
 WILDER FOR PRESIDENT
 S2
 3050 CHAIN BRIDGE RD
 FAIRFAX, VA 22030-2834

MAIL PAYMENT TO:
 FEDERAL EXPRESS CORP
 PO BOX 1140 DEPT A
 MEMPHIS, TN 38101-1140

FEDERAL EXPRESS

BILL TO: WILDER FOR PRESIDENT
 3050 CHAIN BRIDGE RD
 FAIRFAX, VA 22030

SENDER ACTIVITY SUMMARY

INVOICE NO. 4-499-09607 ACCOUNT NO. 1568-6686-5
 PAGE 1 OF 8
 DATE 12/04/91

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
362151957A	EK EASTER WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	DEBORAH LANGFORD WARNER BROTHERS 4000 WARNER BLVD BURBANK, CA 91522 AA DELIVERED 11/22/91 10:30 SIGNED: D.LANGFORD	1/ 8	STANDARD TBE INVAL ACCT#	24.75 5.00	29.75
85916725	1 SHIPPED 11/21/91					
3621519565	JOHN BRAZZELL WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	RE DAVIS YOUNG 9 RANCHESTER RD NEWTON HIGHLANDS, MA 02161 AA DELIVERED 11/23/91 10:04 SIGNED: B.YOUNG	1/ 1	PRIORITY PAK SAT SERVICE INVAL ACCT#	22.50 10.00 5.00	37.50
85915631	1 SHIPPED 11/22/91					
3096808643	SARAH CALLAHAN WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	NAME BELT WILDER FOR PRESIDENT 120 N MAIN ST CONCORD, NH 03301 AA DELIVERED 11/27/91 12:20 SIGNED: S.CALLY	1/ 30	STANDARD PCK	50.75	50.75
85913881	1 SHIPPED 11/26/91					

CONTINUED NEXT PAGE

FEDERAL EXPRESS

BILL TO: WILDER FOR PRESIDENT
 3050 CHAIN BRIDGE RD
 FAIRFAX, VA 22030

SENDER ACTIVITY SUMMARY

INVOICE NO. 4-499-09607 ACCOUNT NO. 1568-6686-5
 PAGE 2 OF 8
 DATE 12/04/91

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
3096808654	SARAH CALLAHAN WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	CAROL DAVIDSON OFFICE OF GOVERNOR WILDER 3 STATE CAPITOL OF VIRGINIA RICHMOND, VA 23219 AA DELIVERED 11/27/91 14:05 SIGNED: S.DAVIS	1/ NA	STANDARD LTR	11.50	11.50
85913881	1 SHIPPED 11/26/91					
3096808652	JOHN BRAZZELL WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	HARCY CHAMBLISS WILDER & GREGORY LAW FIRM 2509 E BROAD ST RICHMOND, VA 23225 AA DELIVERED 12/03/91 09:57 SIGNED: S.CASHWELL	1/ 3	PRIORITY PAK	27.00	27.00
85915056	1 SHIPPED 12/02/91					
3906784523	RONALD L LESTER WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	MS KATHY DAVIDSON ESQ 16 MONTGOMERY PL NEW ROCHELLE, NY 10804 AA DELIVERED 12/03/91 11:03 SIGNED: K.DAVIDSON	1/ NA	STANDARD LTR	11.50	11.50
85918195	1 SHIPPED 12/02/91					

CONTINUED NEXT PAGE

ATTACHMENT

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FEDERAL EXPRESS

BILL TO: WILDER FOR PRESIDENT
 3050 CHAIN BRIDGE RD
 FAIRFAX, VA 22030

SENDER ACTIVITY SUMMARY

INVOICE NO. 4-499-09607 ACCOUNT NO. 1568-6686-5
 PAGE 3 OF 8
 DATE 12/06/91

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
1006746534	SARAH CALLAHAN	CAROL DAVIDSON	1/ NA	STANDARD LTR	11.50	11.50

3096602176	BILL KEOUGH GOVERNOR'S OFFICE STATE CAPITOL RICHMOND, VA 23219 1ST ATTEMPT 11/21/91 10:05 00 DROP OFF 11/20/91	PETER LEBLANC ADA COUNTY DEMOCRATIC PARTY 818 BRUMBACK ST BOISE, ID 83702 AA DELIVERED 11/21/91 17:31 SIGNED: P. LEBLANC	1/ WA	PRIORITY LTR DISCOUNT	15.50 -2.50	13.00
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CONTINUED NEXT PAGE



BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

PAGE 6 OF 8
DATE 12/04/91
INVOICE NO. 4-499-09607 ACCOUNT NO. 1568-6484-5

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
3096602095	BILL KEOUGH GOVERNOR'S OFFICE STATE CAPITOL RICHMOND, VA 23219	CHERYL LAWSON 1710 W ST NW 3 WASHINGTON, DC 20007 AA DELIVERED 11/23/91 10:01 SIGNED: S. LAWSON	1/ WA	PRIORITY LTR SAT SERVICE	15.50 10.00	25.50
74003252	1 SHIPPED 11/22/91					
3096602165	WILLIAM BROWNING GOVERNOR'S OFFICE STATE CAPITOL RICHMOND, VA 23219	HARRAN BOND WILDER FOR PRESIDENT 128 W MAIN ST CONCORD, NH 03301 AA DELIVERED 11/23/91 11:06 SIGNED: W. BOND	1/ 2	PRIORITY PAR SAT SERVICE	24.25 10.00	34.25
74003252	1 SHIPPED 11/22/91					
THIRD PARTY SUBTOTAL			98.75	PAY THIS AMOUNT		372.75



BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

PAGE 7 OF 8
DATE 12/06/91
INVOICE NO. 4-499-09607 ACCOUNT NO. 1568-6484-5

FEDER WAS AUDITED THIS AIRBILL FOR CORRECT PIECES, WEIGHT, AND SERVICE. ANY CHARGES MADE ARE REFLECTED IN THE INVOICE AMOUNT.



BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

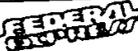
PAGE 8 OF 8
DATE 12/06/91
INVOICE NO. 4-499-09607 ACCOUNT NO. 1568-6484-5

FEDERAL EXPRESS PACKAGE DELIVERY STATUS CODES:

04 SHIPMENT DELIVERED TO ADDRESS OTHER THAN RECIPIENT'S

08 RECIPIENT NOT IN/BUSINESS CLOSED

ATTACHMENT
Page 107 of 122



1548488415025854498000155033	1548-4486-5	1-502-58544	NET DUE: 25.00
			NET DUE:
			INVOICE TOTAL 25.00

FEDERAL EXPRESS

REMITTANCE ADVICE
1548-4486-5
ACCOUNT NUMBER

1-502-58544
INVOICE NUMBER

20 JAN 92
DATE

PAYMENT DUE IN 15 DAYS OF INVOICE DATE

15.50
AMOUNT DUE IN
U.S. DOLLARS

1548488415025854498000155033

PLEASE DO NOT STAPLE OR PAPER CLIP

10020***** 5-DIGIT 22030

00348 WILDER FOR PRESIDENT
ATTN: 55
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030-2834

INVOICE INQUIRIES: CALL 800 6221147 EXT. INT

FREIGHT INVOICE

TO ENSURE PROPER CREDIT, PLEASE RETURN THIS DOCUMENT WITH YOUR REMITTANCE.

REMIT TO:
FEDERAL EXPRESS CORPORATION
P O BOX 1140 DEP A
MEMPHIS, TN 38101-1140

T.I.N.: 71-0427007

.... (83)....

FEDERAL EXPRESS

INVOICE SUMMARY

WILDER FOR PRESIDENT 55
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030-2834

ACCOUNT NUMBER: 1548-4486-5
DATE: 20 JAN 92
INVOICE NUMBER: 1-502-58544

ITEMS BILLED TO 3RD PARTY:	QUANTITY	CHARGES	DISCOUNTS	DUTIES/TAXES	VAT	OTHER TAX	NET
FEDEX LETTER	1	15.50	.00	.00	.00	.00	15.50
BILL TO 3RD PARTY SUBTOTAL	1	15.50	.00	.00	.00	.00	15.50
TOTAL IN U.S. DOLLARS	1	15.50	.00	.00	.00	.00	15.50

FEDERAL EXPRESS

INVOICE DETAIL

WILDER FOR PRESIDENT 55
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030-2834

ACCOUNT NO: 1548-4486-5 PAGE: 1 OF 1
DATE: 20 JAN 92
INVOICE NUMBER: 1-502-58544

SHIPMENT NUMBERS	SENDER NAME AND ADDRESS	RECIPIENT	SERVICES	ITEMS WEIGHT	CHARGES	USD AMOUNT
40073274582 R04-SJU	BILL KEOUGH GOVERNORS OFFICE STATE CAPITOL RICHMOND VA US 23219	THE HON ANTONIO COLORADO SECRETARY OF STATE APARTADO 3271 SAN JUAN PR US 00902	FEDEX LTR	1 .501	15.50(US)	15.50
58380 00000	REFERENCE: 15 JAN 92	DELIVERED: 16 JAN 92, 14:33 SIGNED: H. BOHET				NET DUE: 15.50
						NET DUE: 15.50
						INVOICE TOTAL 15.50

ATTACHMENT 6
Page 109 of 122

.... 803....



REMITTANCE ADVICE

PAYMENT DUE IN 15 DAYS

1529-5072-1 4-487-68148 11/22/91
ACCOUNT NUMBER INVOICE NUMBER DATE

ADDRESS CORRECTIONS
CALL: 800-622-1147
7AM - 6PM CST

973.25
AMOUNT DUE

25
AIRBILLS

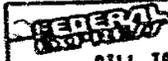
152950724487681480400973 1/2

DO NOT STAPLE OR PAPER CLIP

TO INSURE PROPER CREDIT, PLEASE RETURN
THIS DOCUMENT WITH YOUR REMITTANCE

WILDER FOR PRESIDENT
MELISSA BLACK 22
PO BOX 25033
ALEXANDRIA, VA 22315-5033

MAIL PAYMENT TO:
FEDERAL EXPRESS CORP
PO BOX 1140 DEPT A
MEMPHIS, TN 38101-1140



SENDER ACTIVITY SUMMARY

PAGE 1 OF 12
DATE 11/22/91

BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

INVOICE NO. 4-487-68148 ACCOUNT NO. 1529-5072-1

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
3096602224	RUTH JONES WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	SARAH CALLAHAN WILDER FOR PRESIDENT S 3050 CHAINBRIDGE RD STE 404 FAIRFAX, VA 22030 AA DELIVERED 11/13/91 08:42 SIGNED: S CALLAHAN	1/ NA	PRIORITY LTR	15.50	
87145504	1 SHIPPED 11/12/91					15.50
3096808503	JOHN BRAZZELL WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	DR ROGER BENKELT 1335 E 87TH ST CHICAGO, IL 60619 AA DELIVERED 11/13/91 09:51 SIGNED: R JACKSON	1/ S	PRIORITY PAK	32.50	
85922476	1 SHIPPED 11/12/91					32.50
3096803525	JOHN BRAZZELL WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	DEBORAH PARKS S R WOODBACK & ASSOC STE 850 200 S BROAD ST THE BELLEVUE PHILADELPHIA, PA 19102 AA DELIVERED 11/13/91 08:55 SIGNED: S. MURRELLY	1/ 2	PRIORITY PAK	24.25	
85921850	1 SHIPPED 11/12/91					24.25

CONTINUED NEXT PAGE



SENDER ACTIVITY SUMMARY

PAGE 2 OF 12
DATE 11/22/91

BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

INVOICE NO. 4-487-68148 ACCOUNT NO. 1529-5072-1

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
3621519650	SARAH CALLAHAN WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	CAROL DAVIDSON OFFICE OF GARNER WILDER S STATE CAPITOL OF VIRGINIA RICHMOND, VA 23219 AA DELIVERED 11/13/91 11:52 SIGNED: W. GOEGERER	1/ 1	STANDARD PAK	15.50	
85922476	1 SHIPPED 11/12/91					15.50
7086518821	MRS J P FARRINGTON WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	MR JOHN BRAZZELL WILDER FOR PRESIDENT 3050 CHAINBRIDGE RD STE 404 FAIRFAX, VA 22030 AA DELIVERED 11/13/91 08:42 SIGNED: S CALLAHAN	1/ NA	PRIORITY LTR ACCT P CORR	15.50 5.00	
81140835	1 SHIPPED 11/12/91					20.50
3096602202	RUTH JONES WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	MADE REILLY 120 N MAIN ST CONCORD, NH 03301 AA DELIVERED 11/14/91 09:24 SIGNED: R. EASTMAN	1/ NA	PRIORITY LTR DISCOUNT	15.50 -2.50	
87147281	1 DROP OFF 11/13/91					13.00

CONTINUED NEXT PAGE

ATTACHMENT

Page 179 of 122



SENDER ACTIVITY SUMMARY

PAGE 3 OF 12
DATE 11/22/91

BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD

INVOICE NO. 4-487-68148 ACCOUNT NO. 1529-5072-1



BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

SENDER ACTIVITY SUMMARY

PAGE 3 OF 12
DATE 11/22/91
INVOICE NO. 4-487-68148 ACCOUNT NO. 1529-5072-1

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
3096602213 87147281 1	RUTH JONES WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	INDIA ADAMS WILDER FOR PRESIDENT STE 404 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030 AA DELIVERED 11/14/91 10:19 SIGNED: A. SMITH	1/ NA	PRIORITY LTR DISCOUNT	15.50 -2.50	13.00
3096808724 85920962 1	ANTOINE SMITH WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	BERNARD STEVENSON 1703 ROOSEVELT ST LAWTON, OK 73501 AA DELIVERED 11/14/91 08:24 SIGNED: R. STEVENSON	1/ 5	PRIORITY BOX ACCT & CORR	32.50 3.00	37.50
3096608735 85920962 1	JOHN BRAZZELL WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030 1ST ATTEMPT 11/14/91 09:03 03 SHIPPED 11/13/91	CLARETTA HODGES 1123 SOUTH LOTHAIN CHICAGO, IL 60643 AA DELIVERED 11/14/91 09:22 SIGNED: R. DUDLEY	1/ 2	PRIORITY PAK ADDRESS CORR	24.25 5.00	29.25

CONTINUED NEXT PAGE



BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

SENDER ACTIVITY SUMMARY

PAGE 4 OF 12
DATE 11/22/91
INVOICE NO. 4-487-68148 ACCOUNT NO. 1529-5072-1

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
3096602180 87144982 1	RUTH JONES WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD STE 404 FAIRFAX, VA 22030 AA DELIVERED 11/15/91 10:18 SIGNED: A. SMITH	1/ NA	PRIORITY LTR	15.50	15.50
3096602191 87144982 1	BILL KEOUGH WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	MARE BEILLY WILDER FOR PRESIDENT 120 N MAIN ST CONCORD, NH 03301 AA DELIVERED 11/15/91 09:24 SIGNED: M. HARKIN	1/ 1	PRIORITY PAK	22.50	22.50
3096608713 85920645 1	JOHN BRAZZELL WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030 1ST ATTEMPT 11/15/91 09:31 08 SHIPPED 11/14/91	MR BEN BROWN WILDER FOR PRESIDENT 196 NAPOLEON SQ SW ATLANTA, GA 30314 AA DELIVERED 11/15/91 20:00 SIGNED: B. BROWN	1/ NA	PRIORITY LTR	15.50	15.50

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BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

SENDER ACTIVITY SUMMARY

PAGE 5 OF 12
DATE 11/22/91
INVOICE NO. 4-487-68148 ACCOUNT NO. 1529-5072-1

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
3621519624 85920892 1	ANTOINE SMITH WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	MARE BEILLY 120 N MAIN ST CONCORD, NH 03301 AA DELIVERED 11/15/91 09:24 SIGNED: M. HARKIN	1/ 3	PRIORITY PAK	27.00	27.00
3621519635 85920645 1	JOHN BRAZZELL WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	MARTHA DOWNET THE PALMER HOUSE 17 EAST MONROE STREET CHICAGO, IL 60603 AA DELIVERED 11/15/91 09:24 SIGNED: J. LAGUNA	1/ NA	PRIORITY LTR	15.50	15.50
3621519646 85920645 1	INDIA ADAMS WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030 1ST ATTEMPT 11/15/91 10:28 24 SHIPPED 11/14/91	RUTH JONES GOVERNOR WILDER OFFICE STATE CAPITAL OF VIRGINIA RICHMOND, VA 23219 AA DELIVERED 11/15/91 10:34 SIGNED: J. CARNEY	1/ 1	PRIORITY BOX	47.50	47.50

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BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

SENDER ACTIVITY SUMMARY

PAGE 6 OF 12
DATE 11/22/91
INVOICE NO. 4-487-68148 ACCOUNT NO. 1529-5072-1

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
3621519602	ANTOINE SMITH	FRED HUMPHRIES	1/ 6	STANDARD BOX	21.25	

9507019-2733

PC 88 011

3621519646	INDIA ADEAS WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030 1ST ATTEMPT 11/15/91 10:28 24 1 SHIPPED 11/14/91	RUTH JONES GOVERNOR WILDER OFFICE STATE CAPITAL OF VIRGINIA RICHMOND, VA 23219 AA DELIVERED 11/15/91 10:36 SIGNED: J. CARAHY	1/ 11	PRIORITY BOX	47.50	47.50
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BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

SENDER ACTIVITY SUMMARY

INVOICE NO. 6-487-68148 ACCOUNT NO. 1529-5072-1

PAGE 6 OF 12
DATE 11/22/91

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
3621519602	ANTOINE SMITH WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030 1ST ATTEMPT 11/18/91 12:15 00 1 SHIPPED 11/15/91	FRED HUMPHRIES 3616 FLEETWOOD RD HERITAGE, TN 37074 AA DELIVERED 11/18/91 12:19 SIGNED: E. GOODMAN	1/ 6	STANDARD BOX	21.25	21.25
3621519613	SARAH CALLAHAN WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	CAROL DAVIDSON OFFICE OF GOVERNOR WILDER 3 STATE CAPITOL OF VIRGINIA RICHMOND, VA 23219 AA DELIVERED 11/19/91 14:30 SIGNED: L. CORNISH	1/ NA	STANDARD LTR	11.50	11.50
85920273						
85919621						
SENDER SUBTOTAL					377.25	

CONTINUED NEXT PAGE



BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

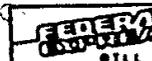
RECIPIENT ACTIVITY SUMMARY

INVOICE NO. 6-487-68148 ACCOUNT NO. 1529-5072-1

PAGE 7 OF 12
DATE 11/22/91

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
608087896	MARY ANN GRAMS EMBASSY ROW HOTEL 2015 MASS AVE N W WASHINGTON, DC 20036 1ST ATTEMPT 11/11/91 09:23 08 1 SHIPPED 11/08/91	WILDER FOR PRESIDENT 120 N MAIN ST CONCORD, NH 03301 AA DELIVERED 11/12/91 09:23 SIGNED: M. EASTMAN	1/ NA	PRIORITY LTR	15.50	15.50
608087911	MARY ANN GRAMS EMBASSY ROW HOTEL 2015 MASS AVE N W WASHINGTON, DC 20036	MARIE REILLY WILDER FOR PRESIDENT 120 N MAIN ST CONCORD, NH 03301 AA DELIVERED 11/14/91 09:24 SIGNED: M. EASTMAN	1/ 60	OVERNITE FRGT	111.25	111.25
95535285						
608087922	MARY ANN GRAMS EMBASSY ROW HOTEL 2015 MASS AVE N W WASHINGTON, DC 20036	MARIE REILLY WILDER FOR PRESIDENT 120 N MAIN ST CONCORD, NH 03301 AA DELIVERED 11/14/91 09:24 SIGNED: M. EASTMAN	1/ 40	PRIORITY PKG	83.75	83.75
95535285						

CONTINUED NEXT PAGE



BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

RECIPIENT ACTIVITY SUMMARY

INVOICE NO. 6-487-68148 ACCOUNT NO. 1529-5072-1

PAGE 8 OF 12
DATE 11/22/91

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
608087933	MARY ANN GRAMS EMBASSY ROW HOTEL 2015 MASS AVE N W WASHINGTON, DC 20036	MARIE REILLY WILDER FOR PRESIDENT 120 N MAIN ST CONCORD, NH 03301 AA DELIVERED 11/14/91 09:24 SIGNED: M. EASTMAN	1/ 50	PRIORITY PKG	96.25	96.25
95535285						
608087944	MARY ANN GRAMS EMBASSY ROW HOTEL 2015 MASS AVE N W WASHINGTON, DC 20036	MARIE REILLY WILDER FOR PRESIDENT 120 N MAIN ST CONCORD, NH 03301 AA DELIVERED 11/14/91 09:24 SIGNED: M. EASTMAN	1/ 50	PRIORITY PKG	96.25	96.25
95535285						
608087955	MARY ANN GRAMS EMBASSY ROW HOTEL 2015 MASS AVE N W WASHINGTON, DC 20036	MARIE REILLY WILDER FOR PRESIDENT 120 N MAIN ST CONCORD, NH 03301 AA DELIVERED 11/14/91 09:24 SIGNED: M. EASTMAN	1/ 40	PRIORITY PKG	83.75	83.75
95535285						

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ATTACHMENT 6

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BILL TO: WILDER FOR PRESIDENT

RECIPIENT ACTIVITY SUMMARY

PAGE 9 OF 12



BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

RECIPIENT ACTIVITY SUMMARY

PAGE 9 OF 12
DATE 11/22/91
INVOICE NO. 4-487-68148 ACCOUNT NO. 1529-5072-1

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
9063627090	MARY ANN GRAMS EMBASSY ROW HOTEL 2015 MASSACHUSETTS AVE NW WASHINGTON, DC 20036	MARIE REILLY WILDER FOR PRESIDENT 120 N MAIN ST CONCORD, MA 03301 AA DELIVERED 11/14/91 09:24 SIGNED: M. EASTMAN	1/ 50	PRIORITY PKG	96.25	
9555285	1 SHIPPED 11/13/91					96.25
RECIPIENT SUBTOTAL			583.00	CONTINUED NEXT PAGE		



BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

THIRD PARTY ACTIVITY SUMMARY

PAGE 10 OF 12
DATE 11/22/91
INVOICE NO. 4-487-68148 ACCOUNT NO. 1529-5072-1

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
3063100740	MICHAEL EASTMAN WILDER FOR PRESIDENT 120 N MAIN ST CONCORD, MA 03301	RUTH JONES GOVERNORS OFFICE STATE CAPITAL RICHMOND, VA 23219 AA DELIVERED 11/06/91 14:26 SIGNED: J. CANADA	1/ 1	STANDARD PAK DISCOUNT	15.50 -2.50	
29887461	1 DECP OFF 11/05/91					13.00
THIRD PARTY SUBTOTAL			15.00	PAY THIS AMOUNT		973.25



BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

ACTIVITY SUMMARY

PAGE 11 OF 12
DATE 11/22/91
INVOICE NO. 4-487-68148 ACCOUNT NO. 1529-5072-1

FEDER HAS AUDITED THIS AIRBILL FOR CORRECT PIECES, WEIGHT, AND SERVICE. ANY CHANGES MADE ARE REFLECTED IN THE INVOICE AMOUNT.



BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

ACTIVITY SUMMARY

PAGE 12 OF 12
DATE 11/22/91
INVOICE NO. 4-487-68148 ACCOUNT NO. 1529-5072-1

FEDERAL EXPRESS PACKAGE DELIVERY STATUS CODES:

ATTACHMENT

Page 112 of 120

95 4012-2-1-5
DC 100115

FEDERAL EXPRESS

BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

ACTIVITY SUMMARY

PAGE 12 OF 12
DATE 11/22/91

INVOICE NO. 4-487-68148 ACCOUNT NO. 1529-5072-1

FEDERAL EXPRESS PACKAGE DELIVERY STATUS CODES:

- | | | | |
|----|----------------------------------|----|--|
| 02 | RELEASE SIGNATURE ON FILE | 03 | INCORRECT RECIPIENT ADDRESS |
| 08 | RECIPIENT NOT IN/BUSINESS CLOSED | 24 | RECIPIENT WAS UNAVAILABLE; THEREFORE, D
ELIVERY DELAYED |

PG 12 OF 12

FEDERAL EXPRESS

057 / 0192 / 6



REMITTANCE ADVICE

PAYMENT DUE IN 15 DAY

1529-5072-1
ACCOUNT NUMBER

4-480-25325
INVOICE NUMBER

11/15/91
DATE

ADDRESS CORRECTIONS?
CALL: 800-622-1147
7AM - 6PM CST

274.50
AMOUNT DUE

17
AIRBILLS

1529507244802532533002745067

DO NOT STAPLE OR PAPER CLIP

TO INSURE PROPER CREDIT, PLEASE RETURN
THIS DOCUMENT WITH YOUR REMITTANCE

10050..... 5-DIGIT 22313
WILDER FOR PRESIDENT
MELISSA BLACK 52
PO BOX 23033
ALEXANDRIA, VA 22313-5033

MAIL PAYMENT TO:
FEDERAL EXPRESS CORP
PO BOX 1140 DEPT A
MEMPHIS, TN 38101-1140



BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

SENDER ACTIVITY SUMMARY

PAGE 1 OF 9
DATE 11/15/91
INVOICE NO. 4-480-25325 ACCOUNT NO. 1529-5072-1

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
2908609405	MARK WARNER WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	ALESIA BELL 3921 NAANS LANE GREENSBORO, NC 27609 AA DELIVERED 10/25/91 13:30 SIGNED: R.BROADBANK	1/ NA	STANDARD LTR DISCOUNT ADDRESS CORR	11.50 -2.50 5.00	14.00
58343486 1	121 ATTEMPT 10/24/91 11:32 03 DROP OFF 10/23/91					
3506414285	RUTH H JONES WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	NAME REILLY C/O CONGRESSMAN MORAN OFC 1523 LONG-WORTH BLDG WASHINGTON, DC 20570 AA DELIVERED 11/06/91 09:12 SIGNED: .MILLER	1/ NA	PRIORITY LTR DISCOUNT	15.50 -2.50	13.00
87147594 1	DROP OFF 11/05/91					
3096602003	RUTH JONES WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	LESLIE J KERNAN EPSTEIN BECKER & GREEN P C 1227 25TH ST N W WASHINGTON, DC 20037 AA DELIVERED 11/07/91 09:44 SIGNED: H.TEMPLIN	1/ NA	PRIORITY LTR	15.50	15.50
87143685 1	SHIPPED 11/06/91					

CONTINUED NEXT PAGE



BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

SENDER ACTIVITY SUMMARY

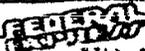
PAGE 2 OF 9
DATE 11/15/91
INVOICE NO. 4-480-25325 ACCOUNT NO. 1529-5072-1

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
3096602235	BILL KEOUGH WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	JOHN BRAZZELL WILDER FOR PRESIDENT ST 404 3050 CHAIN BRIDGE RD STE 404 FAIRFAX, VA 22030 AA DELIVERED 11/07/91 09:54 SIGNED: J.BRAZZELL	1/ NA	PRIORITY LTR	15.50	15.50
87143685 1	SHIPPED 11/06/91					
3421519311	JOHN BRAZZELL WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	MR ROBB SMITH CSI CORP 901 E CAREY ST ONE JAMES CTR RICHMOND, VA 23219 AA DELIVERED 11/07/91 12:04 SIGNED: J.JENKINS	1/ 2	STANDARD PAK	16.50	16.50
1529-5072-1						
87395324 1	SHIPPED 11/06/91					
3421519322	ANTONIE SMITH WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	AYESHA H HUGHES 4400 SHADWICK DR APT 280 SACRAMENTO, CA 95842 AA DELIVERED 11/07/91 09:36 SIGNED: A.HUGHES	1/ NA	PRIORITY LTR	15.50	15.50
1529-5072-1						
87395324 1	SHIPPED 11/06/91					

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ATTACHMENT 6
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BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

SENDER ACTIVITY SUMMARY

INVOICE NO. 4-480-25325 ACCOUNT NO. 1529-5072-1
PAGE 3 OF 9
DATE 11/15/91

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
3421519344 1529 5072 1 87395324 1	WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	CLARETTA HODGES 11213 SOUTH LOTNAIR CHICAGO, IL 60643 AA DELIVERED 11/07/91 12:56 SIGNED: M. DUDLEY	1/ 2	STANDARD PAK	14.50	14.50
3421519355 1529 50721 87395324 1	JOHN BRAZZELL WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	CLARETTA HODGES 11213 SOUTH LOTNAIR CHICAGO, IL 60643 AA DELIVERED 11/07/91 12:56 SIGNED: M. DUDLEY	1/ 3	STANDARD PAK	17.50	17.50
3421519672 1529-5072-1 87396454 1	J. B. WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	P. C. DOWERTY HOME 7 ARABAZIA WAY FORT WALTON BEACH, FL 32548 AA DELIVERED 11/08/91 09:57 SIGNED: P. DOWERTY	1/ 3	PRIORITY PAK	27.00	27.00
CONTINUED NEXT PAGE						



BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

SENDER ACTIVITY SUMMARY

INVOICE NO. 4-480-25325 ACCOUNT NO. 1529-5072-1
PAGE 4 OF 9
DATE 11/15/91

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
3421519641 87395921 1	ANTOINE SMITH WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030	DAVID MITCHELL MT VIEN APT 4 HORSESHOE BEND ROAD HUDSON, NC 28638 AA DELIVERED 11/11/91 09:55 SIGNED: K. STOKE	1/ 5	PRIORITY BOX	32.50	32.50
SENDER SUBTOTAL						183.50
CONTINUED NEXT PAGE						



BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

RECIPIENT ACTIVITY SUMMARY

INVOICE NO. 4-480-25325 ACCOUNT NO. 1529-5072-1
PAGE 5 OF 9
DATE 11/15/91

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
384758360 57302840 1	JOHN B HARRIS 7 E 14TH ST APT 624 NEW YORK CITY, NY 10003	MR JOHN BRAZZELL WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD STE 404 FAIRFAX, VA 22030 AA DELIVERED 11/05/91 09:33 SIGNED: I. AMES	1/ NA	PRIORITY LTR DISCOUNT	15.50 -2.50	13.00
300547682 38997825 1	ALICE E GRAY 51 JOHNST BROOKLINE, MA 02146	ATTN JOHN BRAZZELL COMM TO ELECT D WILDER 3050 CHAIN BRIDGE RD STE 404 FAIRFAX, VA 22030 AA DELIVERED 11/06/91 10:13 SIGNED: A. SMITH	1/ NA	PRIORITY LTR DISCOUNT	15.50 -2.50	13.00
5444428194 96017040 1	STEVEN C ROBERTS 1408 NORTH KINGSMIGNWAY SAINT LOUIS, MO 63113	DOUG/WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD STE 404 FAIRFAX, VA 22030 AA DELIVERED 11/06/91 10:13 SIGNED: A. SMITH	1/ NA	PRIORITY LTR DISCOUNT	15.50 -2.50	13.00
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ATTACHMENT 6

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BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

RECIPIENT ACTIVITY SUMMARY

INVOICE NO. 4-480-25325 ACCOUNT NO. 1529-5072-1
PAGE 6 OF 9
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FEDERAL EXPRESS

BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

RECIPIENT ACTIVITY SUMMARY

PAGE 6 OF 9
DATE 11/15/91
INVOICE NO. 4-480-25325 ACCOUNT NO. 1529-5072-1

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
7186139444 25423193 1	JOYCE ABOUSSIE CEPHARDT IN CONGRESS COMMITTEE 7435 WATSON RD STE 107 SAINT LOUIS, MO 63119 DROP OFF 11/05/91	STAN HARRISON WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030 AA DELIVERED 11/06/91 10:13 SIGNED: A. SMITH	1/ MA	PRIORITY LTR DISCOUNT	15.50 -2.50	13.00
3141193005 23492001 1	ISAAC T GRAVES 51 CURTIS DR PLYMOUTH, MA 02340 DROP OFF 11/06/91	JOHN BRAZELL WILDER FOR PRESIDENT 3050 CHAIN BRIDGE RD FAIRFAX, VA 22030 AA DELIVERED 11/07/91 09:54 SIGNED: J. BRAZELL	1/ MA	PRIORITY LTR DISCOUNT	15.50 -2.50	13.00
6757350946 73442742 1	CHERYL MCAFEE CHARLES MCAFEE ARCHITECT 2400 N GROVE WICHITA, KS 67219 DROP OFF 11/07/91	JOHN BRAZELL WILDER FINANCE CHAIRMAN 3050 CHAIN BRIDGE RD: STE 400 FAIRFAX, VA 22030 AA DELIVERED 11/08/91 09:19 SIGNED: J. THOMPSON	1/ MA	PRIORITY LTR DISCOUNT	15.50 -2.50	13.00

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FEDERAL EXPRESS

BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

RECIPIENT ACTIVITY SUMMARY

PAGE 7 OF 9
DATE 11/15/91
INVOICE NO. 4-480-25325 ACCOUNT NO. 1529-5072-1

TRACKING NOS REFERENCE	SENDER'S NAME AND ADDRESS	RECIPIENT INFORMATION AND PROOF OF DELIVERY	PACKAGES & WEIGHT	SERVICES	CHARGES	NET CHARGES
9334802544 87147342 1	RUTH M JONES GOVERNORS OFFICE STATE CAPITOL RICHMOND, VA 23219 DROP OFF 11/11/91	MARE REILEY WILDER FOR PRESIDENT 120 NORTH MAIN STREET CONCORD, NH 03301 AA DELIVERED 11/12/91 09:23 SIGNED: M. EASTMAN	1/ MA	PRIORITY LTR DISCOUNT	15.50 -2.50	13.00
RECIPIENT SUBTOTAL			91.00	PAY THIS AMOUNT	274.50	

FEDERAL EXPRESS

BILL TO: WILDER FOR PRESIDENT
3050 CHAIN BRIDGE RD
FAIRFAX, VA 22030

ACTIVITY SUMMARY

PAGE 8 OF 9
DATE 11/15/91
INVOICE NO. 4-480-25325 ACCOUNT NO. 1529-5072-1

FEDER HAS AUDITED THIS AIRBILL FOR CORRECT PIECES, WEIGHT, AND SERVICE. ANY CHANGES MADE ARE REFLECTED IN THE INVOICE AMOUNT.

BILL TO: WILDER FOR PRESIDENT
3010 CHAIN BRIDGE RD
FAIRFAX, VA 22030

ACTIVITY SUMMARY

PAGE 9 OF 9
DATE 11/15/91
INVOICE NO. 4-480-25325 ACCOUNT NO. 1529-5072-9

FEDERAL EXPRESS PACKAGE DELIVERY STATUS CODES:

03 INCORRECT RECIPIENT ADDRESS

REMITTANCE ADVICE

PAYMENT DUE IN 15 DAYS

FEDERAL EXPRESS

0
9
5
7
0
1
9
2
7

EPSTEIN BECKER & GREEN, P.C.

ATTORNEYS AT LAW

1227 28TH STREET, N.W.

WASHINGTON, D.C. 20037-1188+

(202) 891-0900

TELECOPIER: (202) 899-2882

DIRECT LINE

280 PARK AVENUE
NEW YORK, NEW YORK 10177-0077
(212) 361-2800

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LOS ANGELES, CALIFORNIA 90067-8801
(310) 556-0001

645 LANMARK SQUARE
STAMFORD, CONNECTICUT 06901-270-01
(800) 540-8737

ONE RIVERFRONT PLAZA
NEWARK, NEW JERSEY 07102-8401
(800) 642-1999

75 STATE STREET
BOSTON, MASSACHUSETTS 02109
(617) 542-2800

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SAN FRANCISCO, CALIFORNIA 94111-0804
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12750 MERIT DRIVE
DALLAS, TEXAS 75261-1007
(214) 408-3148

116 SOUTH HONOLULU STREET
TALLAHASSEE, FLORIDA 32301-1000
(904) 824-0888

2400 SOUTH BEEK HIGHLAND, SUITE 102
MIAMI, FLORIDA 33133
(305) 555-1100

510 KING STREET, SUITE 301
ALEXANDRIA, VIRGINIA 22304-3807
(703) 624-2224

LEGAL & CONFIDENTIAL

July 25, 1994

VIA TELECOPY (202/219-3923)

Kim L. Bright-Coleman, Esquire
Associate General Counsel
Office of the General Counsel
Federal Election Commission
999 E Street, N.W., Room 657
Washington, DC 20463

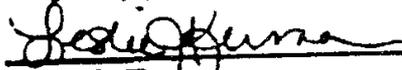
RE: WILDER FOR PRESIDENT COMMITTEE: RESPONSE TO FINAL AUDIT REPORT

Dear Ms. Bright-Coleman:

Attached please find three additional memoranda, to be included as part of the Wilder for President Committee's response to the Final Audit Report.

Also attached is a Statement from Ronald Lester which was omitted from this afternoon's filing with your office.

Very truly yours,



Leslie J. Kerlan
General Counsel
Wilder for President Committee

Enclosures

Jul 26 7 10 AM '94

FEDERAL ELECTION COMMISSION
OFFICE OF THE GENERAL COUNSEL

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STATEMENT OF RONALD LESTER

This statement concerns the \$2,392.30 expense reimbursement payment which I received from the Wilder for President Committee ("the Committee") by check dated April 15, 1992.

This \$2,392.30 served to reimburse me for expenses I incurred on behalf of the Committee in November and December, 1991 - at which time I was working as a paid consultant to the Committee. Specifically, I incurred expenses on behalf of the Committee for telephone calls and a car rental on November 15-17, 1991. Moreover, I incurred expenses in connection with work performed for the Committee in December, 1991 at both the National Black Caucus of State Legislators meeting (including advance work for the Governor) and the Florida State Democratic Convention (where convention delegates participated in a presidential straw poll).

All expenses which I submitted for reimbursement were incurred on behalf of, and for the benefit of, the Committee.

DATED: July 25, 1994

Ronald Lester
Ronald Lester

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WILDER FOR PRESIDENT COMMITTEE

FINAL AUDIT REPORT

RESPONSE TO RECOMMENDATIONS #3, #4 & #5

SUBJECT: Transactions Involving The Commonwealth of Virginia

- I. The Committee disputes the Audit Division's recommendations that it pay to the Commonwealth of Virginia an additional \$30,848 for expenses incurred for use of the Commonwealth's airplane and helicopter (Recommendation No. 3) and telephone (Recommendation No. 4). The Committee incorporates by reference its response to the Interim Audit Report with respect to the instant matters. Moreover, the Committee emphasizes that, to the best of its knowledge, it has made all payments required by the Commonwealth of Virginia for goods and services utilized in connection with the presidential campaign.
- II. In addition to concluding that the Committee owed to the Commonwealth \$30,848 for the above-referenced expenses, the Audit Division determined that the Committee made non-qualified campaign expenses and thus "unnecessary payments or overpayments" to the Commonwealth in the amount of \$5,316.29 (See Recommendation No. 5, III.C.4. and Attachment 8).

Assuming arguendo that the referenced \$5,316.29 in payments were for non-campaign-related expenses, it is the position of the Committee that the Commonwealth of Virginia should be treated as any other single vendor and that any "overpayments" made to the Commonwealth should be deducted from any outstanding amounts due the Commonwealth. If, for example, the Committee made payments to its media consultant for a media buy which was not made or for a commercial which cost less than anticipated, the final amount payable to the media consultant simply would be reduced by these amounts (the disbursements would not be separated out and treated as a non-qualified campaign expenses). Likewise, if the Committee is eventually required to make a payment to the Commonwealth, such payment must be reduced by any overpayments.

In short, the Committee believes that payments to a single entity must be treated and reconciled in their entirety - with underpayments and overpayments/unnecessary payments simply offset against each other to determine whether there exists a surplus or deficit position.

In this instance, relying upon the Audit Division's calculations, any amount owed the Commonwealth by the Committee should be reduced by \$5,316.29. Moreover, the \$5,316.29 should not be considered non-qualified campaign expenses for which a repayment to the U.S. Treasury is required.

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WILDER FOR PRESIDENT COMMITTEE

FINAL AUDIT REPORT

RESPONSE TO RECOMMENDATIONS #5 & #6

SUBJECT: Apparent Non-Qualified Campaign Expenses

The Committee disputes the Audit Division's classification of \$42,224 in Committee payments as "non-qualified campaign expenses," and incorporates by reference its responses to the Interim Audit Report on the instant matters.

Further, with respect to the \$10,000 payment to Ms. Jones, the Committee strongly disputes the Audit Division's assertion that the Committee classified the payment to Ms. Jones as "accounting services" necessary to wind-down the campaign, and that the Committee currently is attempting to recharacterize the payment (See Final Audit Report at page 34, first paragraph of text and footnote 12). The Committee never stated or indicated in any manner that the \$15,000 estimated for wind-down accounting expenses on its January 8, 1992 NOCO Statement corresponded to, or was in any way related to, the referenced \$10,000 payment of January 29, 1992 to Ms. Jones. Thus, any conclusions based on this premise are incorrect.

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WILDER FOR PRESIDENT COMMITTEE

FINAL AUDIT REPORT

RESPONSE TO RECOMMENDATION #6

SUBJECT: Matching Funds In Excess Of Entitlement

The Committee disputes the Audit Division's conclusion that the Committee received matching funds in excess of entitlement, as well as the characterizations reflected in Attachments #6-8 of the Final Audit Report.

The Committee is particularly troubled by the Audit Division's inclusion of a \$15,452 amount under the Capital Assets section of its revised NOCO Statement (Final Audit Report, page 28). According to the Audit Division, this figure represents the value of a lease buyout by the Committee, as well as prepaid lease payments.

The Committee disputes the Audit Division's instant Capital Assets figure. The Committee is not aware of any precedent for characterizing post-ineligibility lease payments as capital assets for NOCO purposes. Moreover, it questions whether, for NOCO purposes, a lease buyout should be treated the same as a direct purchase of a capital asset.

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REPORT OF THE AUDIT DIVISION
ON

Wilder for President

Approved April 21, 1994

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FEDERAL ELECTION COMMISSION
999 E STREET, N.W.
WASHINGTON, D.C.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

FINAL AUDIT REPORT
ON
WILDER FOR PRESIDENT COMMITTEE
EXECUTIVE SUMMARY

Wilder for President Committee (the Committee) registered with the Federal Election Commission as Wilder for President Exploratory Committee on March 27, 1991. The Committee was the principal campaign committee of Governor Douglas Wilder, a candidate for the 1992 Democratic presidential nomination.

The audit was conducted pursuant to 26 U.S.C. §9038(a), which requires the Commission to audit committees that receive Federal funds. The Committee received \$289,027 in matching funds from the U.S. Treasury.

The findings of the audit were presented to the Committee at an exit conference held on August 11, 1992 and in the interim audit report approved by the Commission on May 25, 1993. The Committee was given an opportunity to respond to the findings both after the exit conference and after receipt of the interim audit report. These responses have been included in the findings set forth in this report.

In the final audit report, the Commission made an initial determination that the Committee repay the U.S. Treasury a total of \$31,058 in connection with the receipt of matching funds in excess of the candidate's entitlement, and the payment of non-qualified campaign expenses. In addition, the Commission determined that a payment to the U.S. Treasury of \$9,184 is required in connection with the Committee's receipt of prohibited contributions from corporate entities and excessive contributions from individuals.

The following is an overview of the findings contained in the final audit report.

Apparent Non-qualified Campaign Expenses - 26 U.S.C. §9032(9) and 11 C.F.R. §9038.2(b)(2). The Committee did not provide documentation to resolve \$42,224 in non-qualified campaign expenses. In the final audit report the Commission made an initial determination that the Committee repay \$12,026, the pro-rata amount, to the U.S. Treasury.

Matching Funds Received in Excess of Entitlement - 26 U.S.C. §9038(b)(1). The Commission made an initial determination that the Committee repay \$19,032 to the U.S. Treasury. This determination was based on an analysis of the Committee's Statement of Net Outstanding Campaign Obligations and relevant receipts activity, which showed that the candidate had received \$19,032 in matching funds in excess of the amount to which he was entitled.

Transactions Involving Commonwealth of Virginia - 11 C.F.R. §9034.7(a), 11 C.F.R. §9034.7(b), 11 C.F.R. §§100.7(a)(1)(iii)(A) and (B). The Commission determined that the Committee had to pay \$30,848 to the Commonwealth of Virginia. Of that amount, \$27,977 represented the difference between the lowest unrestricted and non-discounted first class air fare and the amount actually paid by the Committee for the use of Commonwealth aircraft. An additional \$2,871 in phone services also had to be reimbursed to the Commonwealth.

Apparent Prohibited and Excessive Contributions - 2 U.S.C. §441a(a)(1)(A) and 2 U.S.C. §441b(a). The Committee must pay \$9,184 to the U.S. Treasury, representing the value of unresolved corporate contributions and unresolved excessive contributions from individuals. Counsel for the Committee challenged the Commission's authority to require such payments. The Commission did not find the Committee's arguments persuasive.

Use of Corporate Aircraft - 11 CFR §114.9(e). The interim report had recommended that, absent a demonstration to the contrary, the Committee make a \$6,318 payment to the U.S. Treasury, the amount representing an apparent underpayment for the use of corporate aircraft. In response, the Committee provided documentation from the corporations which reduced the underpayment to an insignificant amount.

Misstatement of Financial Activity - 2 U.S.C. §5434(b)(1), (2), and (4). On its disclosure reports, as initially filed, for the period January 1, 1991, through April 30, 1992, the Committee misstated its financial activity. The Committee filed amended reports which corrected the misstatements.



REPORT OF THE AUDIT DIVISION
ON THE
WILDER FOR PRESIDENT COMMITTEE

I. Background

A. Audit Authority

This report is based on the audit of the Wilder for President Committee (the Committee). The audit is mandated by Section 9038(a) of Title 26 of the United States Code. That section states that "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." Also Section 9039(b) of the United States Code and Section 9038.1(a)(2) of the Commission's Regulations state that the Commission may conduct other examinations and audits from time to time as it deems necessary.

In addition to examining the receipt and use of Federal funds, the audit seeks to determine if the campaign has materially complied with the limitations, prohibitions and disclosure requirements of the Federal Election Campaign Act of 1971, as amended.

B. Audit Coverage

The audit covered the period from the Committee's inception, January 1991, through April 30, 1992. During this period, the Committee reported an opening cash balance of \$ -0-, total receipts of \$802,058, total disbursements of \$646,931 and a closing cash balance on April 30, 1992 of \$155,127. In addition, a limited review of the Committee's transactions was conducted through August 12, 1993, for purposes of determining the Committee's remaining matching fund entitlement based on its financial position.

C. Campaign Organization

The Committee registered with the Federal Election Commission on March 27, 1991 as Wilder for President Exploratory

Committee. An amended Statement of Organization was filed on September 27, 1991 changing the name to the Wilder for President Committee. The Treasurer of the Committee during the period covered by the audit was Mark R. Warner. The current Treasurer is Mark R. Warner.

During the period audited, the campaign established an office in New Hampshire in addition to its national headquarters located in Fairfax, VA (initially located in Alexandria, Virginia). The Committee's current offices are located in Washington, D.C.

To handle its financial activity, the campaign used one bank account. The Committee made approximately 546 disbursements. Approximately 2,741 contributions were received from 2,669 persons. These contributions totaled approximately \$532,000.

In addition to contributions, the campaign received \$289,027 in matching funds from the United States Treasury. This represents approximately 2% of the \$13,810,000 maximum entitlement that any candidate could receive. The candidate was determined eligible to receive matching funds on November 27, 1991. To date, the campaign has made a total of two matching fund requests totaling \$297,252. The Commission has certified 97.2% of the requested amount. For matching fund purposes, the Commission determined that Governor Wilder's candidacy ended January 8, 1992. This determination was based on a public statement made by the candidate. The campaign received one matching fund payment after January 8, 1992, based on the financial condition presented in the Committee's Statement of Net Outstanding Campaign Obligations (see Finding III.A.).

Attachment 1 to this report is a copy of the Commission's most recent Report on Financial Activity for this campaign. The amounts shown are as reported to the Commission by the campaign.

D. Audit Scope and Procedures

In addition to a review of the qualified and non-qualified campaign expenses incurred by the campaign (see Finding III.C.), the audit covered the following general categories:

1. The receipt of contributions or loans in excess of the statutory limitations (see Finding II.A.);
2. the receipt of contributions from prohibited sources, such as those from corporations or labor organizations (see Finding II.B.);
3. proper disclosure of contributions from individuals, political committees and other entities, to include the itemization of

contributions when required, as well as, the completeness and accuracy of the information disclosed;

4. proper disclosure of disbursements including the itemization of disbursements when required, as well as, the completeness and accuracy of the information disclosed;
5. proper disclosure of campaign debts and obligations;
6. the accuracy of total reported receipts, disbursements and cash balances as compared to campaign bank records (see Finding II.C.);
7. adequate recordkeeping for campaign transactions (see Finding II.D.);
8. accuracy of the Statement of Net Outstanding Campaign Obligations filed by the campaign to disclose its financial condition and establish continuing matching fund entitlement (see Findings III.A. and D.);
9. the campaign's compliance with spending limitations; and
10. other audit procedures that were deemed necessary in the situation.

In addition, on April 21, 1992, the Audit staff conducted an inventory of the Committee's records to determine if they were materially complete and in an auditable condition. A letter dated May 5, 1992, notified the Committee that records pertaining to several areas of the pending audit were not made available for review. Furthermore, the letter informed the Committee that if at the conclusion of a 30 day period ending June 8, 1992, the items listed on the letter had not been provided, the Commission would issue subpoenas for the production of those records. Records provided in response to our May 5, 1992 request were deemed sufficient to commence fieldwork.

At the entrance conference on June 12, 1992, the Audit staff informed the Committee that a request would be made to the Office of General Counsel for subpoenas to be issued to the Treasurer of Virginia, for the production of detailed invoices related to all payments made to the Treasurer of Virginia (see Attachment 5) by the Committee and records relating to all amounts

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still owed to the Treasurer of Virginia; and to its direct mail vendor for the production of all mail code definitions associated with direct mailings.1/

The subpoena to the Treasurer of Virginia, Eddie N. Moore, Jr., was approved by the Commission on July 7, 1992, and delivered on July 10, 1992. In Mr. Moore's response, dated July 29, 1992, he stated that he did not have in his possession any of the subpoenaed documents.

On the 21st and 24th of July 1992, the Audit staff delivered written requests to the Committee for two missing contributor checks and detailed documentation supporting a \$1,000 credit card transaction at the Jefferson Hotel. The Committee was afforded 10 working days to respond. Despite positive assurances, no documentation was provided for review and the subpoena process was initiated by the Audit staff on August 11, 1992.

In a memorandum dated August 24, 1992, the Office of General Counsel recommended that the subpoena previously issued to the Treasurer of Virginia be redirected to the Commonwealth of Virginia and Governor Wilder as its agent. The redirected subpoena would contain a more detailed request for documentation which should aid the Commonwealth in locating the documents.

In addition, the August 24th memorandum requested approval of two additional subpoenas; the first to Nations Bank to produce the two contributor checks deposited by the Committee^{2/}, and the second to the Jefferson Hotel for the production of the credit card documentation mentioned above.^{3/}

The Commission approved the subpoenas on August 28, 1992.

The following is a chronology of events that occurred subsequent to the Commission's action of August 28, 1992.

November 19 and 20, 1992 - the Audit Division received documentation, submitted by the Committee through the Office of General Counsel, relevant to reimbursements for use of the Governor's office telephones and a state employee's salary.

- 1/ The mail code definitions were provided by the Committee on June 18, 1992, and the subpoena was not issued to the direct mail vendor.
- 2/ The contributor checks were provided by the Committee on August 25, 1992, and the subpoena to Nations Bank was not issued.
- 3/ A response from the Jefferson Hotel was received by the Commission on October 1, 1992.

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November 24, 1992 - the Audit Division notified the Counsel's office that salary documentation was sufficient, however, the documentation for the telephone payment was incomplete.

December 15, 1992 - the Commission approved the filing of a civil suit for subpoena enforcement. Prior to such filing, the Commission granted the Committee 10 days to produce the requested documentation.

December 21, 1992 - the Committee made available additional documentation which supplemented its previous submission with respect to use of phones, as well as documentation which supported certain credit card charges.

January 8, 1993 - the Committee made available, for the first time, official flight logs for use of the State of Virginia airplane.

Documentation received in response to the various subpoenas was determined to be materially complete.

Unless specifically discussed below, no material non-compliance was detected. It should be noted that the Commission may pursue further any of the matters discussed in this report in an enforcement action.

II. Findings and Recommendations - Non-repayment Matters

Introduction to Findings

In light of an October 22, 1993 decision by the Court of Appeals for the D.C. Circuit in FEC v. NRA Political Victory Fund, et al., the Commission reconsidered the interim audit report and voted for its approval on November 9, 1993. As a result of this action, the Committee was afforded an additional 30 days to supplement its earlier response received on August 12, 1993. On December 13, 1993, a supplemental response to the interim audit report was received which, along with the earlier response, was considered when this report was prepared.

A. Apparent Excessive Contributions

Section 441a(a)(1)(A) of Title 2 of the United States Code states that no person shall make contributions to any candidate and his authorized political committees with respect to any election for Federal office which, in the aggregate, exceed \$1,000.

Section 103.3(b)(3) of Title 11 of the Code of Federal Regulations states, in part, that contributions which on their face exceed the contribution limitations set forth in 11 CFR 110.1 and contributions which do not appear to be excessive on their face, but which exceed the contribution limit set forth in

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11 CFR 110.1 when aggregated with other contributions from the same contributor may be either deposited into a campaign depository under 11 CFR 103.3(a) or returned to the contributor. If any such contribution is deposited, the treasurer may request reattribution of the contribution by the contributor in accordance with 11 CFR 110.1(k). If reattribution is not obtained, the treasurer shall, within sixty days of the treasurer's receipt of the contribution, refund the contribution to the contributor.

Section 110.1(k)(3) of Title 11 of the Code of Federal Regulations states, in part, that if a contribution to a candidate or political committee, either on its face or when aggregated with other contributions from the same contributor, exceeds the limitation on contributions set forth in 11 CFR 110.1(b), the treasurer of the recipient political committee may ask the contributor whether the contribution was intended to be a joint contribution by more than one person.

A contribution shall be considered to be reattributed to another contributor if within sixty days from the date of the treasurer's receipt of the contribution, the contributors provide the treasurer with a written reattribution of the contribution, which is signed by each contributor, and which indicates the amount to be attributed to each contributor if equal attribution is not intended.

Finally, Sections 110.1(l)(3) and (5) of Title 11 of the Code of Federal Regulations state, in part, that if a political committee receives a written reattribution of a contribution to a different contributor, the treasurer shall retain the written reattribution signed by each contributor as required by 11 CFR 110.1(k). If a political committee does not retain the written records concerning reattribution, the reattribution shall not be effective and the original attribution shall control.

The Commission notified the Committee by letter dated June 2, 1992, that a sampling technique would be used to identify the dollar amount of excessive contributions received by the Committee. The letter states, in part, Commission regulations provide 60 days in which to seek reattribution, redesignation or refund of excessive contributions (see 11 CFR 103.3(b)(1) and (2)). The Commission will no longer recognize any untimely refunds, redesignations or reattributions made more than 60 days following a candidate's date of ineligibility or after the date of receipt of this letter, whichever is later. Excessive contributions resolved by the committees outside these time periods will not be considered mitigated violations. The Committee received the letter June 8, 1992.

The Audit staff's review of contributions received from individuals identified \$5,200 in excessive contributions involving five contributors (see Attachment 2). As of August 11, 1992 (date of exit conference), the Audit staff determined that no refunds or reattributions were made regarding these excessive contributions.

The Committee did not establish a separate account for handling possible excessive contributions; however, the amount of cash maintained on a monthly basis by the Committee in its bank account was greater than the cumulative total of the excessive contributions deposited (see 11 CFR §103.3(b)(4)).

At the exit conference the Audit staff presented the Committee with a schedule of the apparent excessive contributions. The Committee official acknowledged the receipt of the schedule and stated that Committee personnel would review the apparent errors and attempt to resolve the situation as deemed necessary.

In the interim audit report, the Audit staff recommended that the Committee either:

- demonstrate that the contributions discussed above are not excessive; or
- make a payment to the United States Treasury in the amount of \$5,200, representing the total dollar value of the unresolved excessive contributions.

In response to the interim audit report Counsel for the Committee states:

The Committee disputes the Audit Division's recommendation that it make payment to the United States Treasury for any excessive contribution.

Counsel further states that assuming arguendo that the Committee did accept excessive contributions, the Committee challenges the Commission's authority to require payment of unresolved excessive contributions to the United States Treasury. Contributions deemed excessive are not subject to the repayment provisions of the Presidential Primary Matching Fund regulations. In fact, in a letter to the Committee dated June 2, 1992, the Commission apparently recognizes that it is without the legal authority to require campaign committees to make such payments to the United States Treasury, noting that it will request that unresolved contributions be paid to the United States Treasury.

To the extent that the Committee may have inadvertently accepted excessive contributions, the Committee should be permitted to refund such contributions to

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the respective contributors, with the expressed understanding that any such refunds will be recognized as documented, qualified campaign expenses by the Commission.

Finally, the Committee requests that the Audit Division recommendation that the Committee pay to the United States Treasury \$5,200, representing the total dollar value of the unresolved excessive contributions be deleted.

The Committee has not complied with the above stated recommendation. Arguments submitted questioning the Commission's authority to require a payment are not persuasive; therefore, a payment (\$5,200) to the United States Treasury is warranted. Further, the Audit staff has recognized this recommended payment as a qualified campaign expense, and as such, included this amount on the NOCO statement (see Finding III.A.). Finally, should the Committee make refunds to these contributors, the amount will not be considered a qualified campaign expense.

Recommendation #1

The Audit Division recommends that the Commission determine that the Committee make a payment in the amount of \$5,200 to the United States Treasury.

B. Apparent Prohibited Contributions

Section 441b(a) of Title 2 of the United States Code states, in part, that it is unlawful for any national bank or any corporation organized by authority of any law of Congress to make a contribution or expenditure in connection with any election to any political office or for any corporation whatever, or labor organization, to make a contribution or expenditure in connection with any election to federal office and that it is unlawful for any candidate, political committee or any other person to knowingly accept or receive any contribution prohibited by this section.

The Commission notified the Committee by letter dated June 2, 1992, that a sampling technique would be used to identify the dollar amount of prohibited contributions received by the Committee. The letter states, in part, Commission regulations provide 30 days in which to refund contributions which appear to be prohibited (see 11 CFR 103.3(b)(1) and (2)). The Commission will no longer recognize any untimely refunds made more than 60 days following a candidate's date of ineligibility or after the date of the receipt of this letter, whichever is later. Prohibited contributions resolved by the committees outside these time periods will not be considered mitigated violations. The Committee received the letter June 8, 1992.

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The Audit staff reviewed contributions received from individuals on a sample basis. Our review identified three apparent prohibited contributions, involving three contributors, totaling \$1,500 (see Attachment 3). The sample projected that the total dollar value of unresolved prohibited contributions in the population was \$3,984. As of August 11, 1992 (date of exit conference), the Audit staff determined that no refunds were made regarding these prohibited contributions.

The Committee did not establish a separate account for handling possible prohibited contributions; however, the amount of ending cash on hand reported by the Committee on its monthly disclosure reports was greater than the cumulative total of the prohibited contributions deposited (see 11 CFR §103.3(b)(4)).

At the exit conference the Audit staff presented the Committee with a schedule of apparent prohibited contributions. The Committee acknowledged receipt of the schedule and stated that personnel would review the apparent errors and attempt to resolve the situation as deemed necessary.

In the interim audit report, the Audit staff recommended that the Committee either:

- demonstrate that the contributions discussed above are not prohibited; or
- make a payment to the United States Treasury in the amount of \$3,984, representing the projected dollar amount the unresolved prohibited contributions.

In response to the interim audit report Counsel for the Committee states:

The Committee disputes the Audit Division's recommendation that it make payment to the United States Treasury for any prohibited contribution.

Counsel further states that assuming arguendo that the Committee did accept prohibited contributions, the Committee challenges the Commission's authority to require payment of unresolved prohibited contributions to the United States Treasury. Contributions deemed prohibited are not subject to the repayment provisions of the Presidential Primary Matching Fund regulations. In fact, in a letter to the Committee dated June 2, 1992, the Commission apparently recognizes that it is without the legal authority to require campaign committees

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to make such payments to the United States Treasury, noting that it will request that unresolved prohibited contributions be paid to the United States Treasury.

To the extent that the Committee may have inadvertently accepted prohibited contributions, the Committee should be permitted to refund such contributions to the respective contributors, with the expressed understanding that any such refunds will be recognized as documented, qualified campaign expenses by the Committee. The Committee requests that the Audit Division recommendation that the Committee pay to the United States Treasury \$3,984, representing the total dollar value of the unresolved prohibited contributions be deleted.

Finally, the Committee states,

"The Audit Division's preliminary finding identifies unresolved excessive contributions in the amount of \$5,200.00. The Interim Audit notes that the \$5,200.00 represent(s) the total dollar value of the unresolved excessive contributions. In order to reach this conclusion, the Audit Division obviously reviewed all the contributions received by the Committee. This examination should have enabled the Audit Division to make a preliminary determination regarding the total dollar value of any unresolved prohibited contributions as well. Instead, for some unexplained reason, the Audit Division identified several unresolved prohibited contributions and used a sampling method to project a dollar amount representing unresolved prohibited contributions. After having examined all the contributions, there is no rationale for the Audit Division utilizing a sampling method to project prohibited contributions instead of calculating the total dollar amount. It is the position of the Committee that if the Audit is to contain amounts representing unresolved prohibited contributions, the Audit Division, having already reviewed all the contributions, should be required to

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present a total dollar amount and not a projected amount."

It should be noted that the Audit staff did not review all contributions on a 100% basis. Two separate reviews were performed to determine the amount of excessive contributions (see Finding II.A.). Certain contributions were tested on a sample basis, while other contributions were tested on a 100% basis. Conversely, a sample review was performed to project the value of prohibited contributions received by the Committee. The Committee's position is incorrect.

The Committee has not complied with the above stated recommendation. Arguments submitted questioning the Commission's authority to require a payment are not persuasive; therefore, a payment (\$3,984) to the United States Treasury is warranted. Further, the Audit staff has recognized this recommended payment as a qualified campaign expense, and as such, included this payment on the NOCO statement (see Finding III.A.). Finally, should the Committee make refunds to these contributors, the amount will not be considered a qualified campaign expense.

Recommendation #2

The Audit Division recommends that the Commission determine that the Committee make a payment in the amount of \$3,984 to the United States Treasury.

C. Misstatement of Financial Activity

Sections 434(b)(1), (2) and (4) of Title 2 of the United States Code state, in relevant part, that each report shall disclose the amount of cash on hand at the beginning of the reporting period and the total amount of all receipts and disbursements during the reporting period and the calendar year.

The Audit staff's reconciliation of the Committee's reported activity to its bank activity for the period January 1, 1991 through April 30, 1992, revealed the following misstatements:

1. Receipts

The Committee's reported receipts of \$802,058 were understated by a net amount of \$19,557.

The understatement of receipts was the net result of unreported receipts totaling \$23,106; understated unitemized receipts of \$326; contributor checks returned for "non sufficient funds" totaling \$2,850 for which no adjustment was made to reported receipts; overstated receipts from individuals totaling \$775; and an unexplained reconciling item of \$250.

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2. Disbursements

The Committee's reported disbursements of \$646,931 were understated by a net amount of \$5,157.

The understatement of disbursements was a net result of unreported disbursements totaling \$4,543 and miscellaneous reporting errors totaling \$614.

3. Ending Balance

The Committee's reported ending cash balance at April 30, 1992 of \$155,127 was understated by \$14,400, a net result of the receipt and disbursements misstatements noted above. The correct ending cash balance at April 30, 1992 was \$169,527.

At the exit conference the Audit staff presented the Committee with schedules that detailed the components of the receipts and disbursements misstatements. The Committee stated that amended reports were in the process of being prepared and that a response to the misstatements will be submitted in a timely manner. ^{4/}

In the interim audit report, the Audit staff recommended that the Committee file amended reports to correct the misstatements discussed above.

On August 12, 1993, the Committee filed amended disclosure reports that materially corrected the reporting problems noted.

D. Transactions Involving Commonwealth of Virginia

Introduction

During calendar years 1991 and 1992, the Committee was invoiced by the Office of the Governor, Commonwealth of Virginia (the Commonwealth) for goods/services provided, including the use of (1) an airplane and a helicopter^{5/}, (2) telephones, (3) credit card, and (4) labor and equipment/facilities. The Commonwealth billed approximately \$70,730 and received payment.

^{4/} The Committee submitted an amendment to its July monthly report which corrected a portion of the misstatement noted for disbursements.

^{5/} The use of the helicopter was provided by the Virginia Department of State Police.

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1. Use of the Airplane and Helicopter

Section 9034.7(a) of Title 11 of the Code of Federal Regulations states that notwithstanding the provisions of 11 CFR part 106, expenditures for travel relating to the campaign of a candidate seeking nomination for election to the office of President by any individual, including a candidate, shall, pursuant to the provisions of 11 CFR 9034.7(b), be qualified campaign expenses and be reported by the candidate's authorized committee(s) as expenditures.

Section 9034.7(b)(1) through (5) of Title 11 of the Code of Federal Regulations states for a trip which is entirely campaign-related, the total cost of the trip shall be a qualified campaign expense and a reportable expenditure.

For a trip which includes campaign-related and non-campaign related stops, that portion of the cost of the trip allocable to campaign activity shall be a qualified campaign expense and a reportable expenditure. Such portion shall be determined by calculating what the trip would have cost from the point of origin of the trip to the first campaign-related stop and from that stop through each subsequent campaign-related stop, back to the point of origin. If any campaign activity, other than incidental contacts, is conducted at a stop, that stop shall be considered campaign related.

For each trip, an itinerary shall be prepared and such itinerary shall be made available for Commission inspection.

For trips by government conveyance or by charter, a list of all passengers on such trip, along with a designation of which passengers are and which are not campaign-related, shall be made available for Commission inspection.

If any individual, including a candidate, uses government conveyance or accommodations paid for by a government entity for campaign-related travel, the candidate's authorized committee shall pay the appropriate government entity an amount equal to the first class commercial air fare plus the cost of other services, in the case of travel to a city served by a regularly scheduled commercial service; or the commercial charter rate plus the cost of other services, in the case of travel to a city not served by a regularly scheduled commercial service.

Also, 11 C.F.R. §§100.7(a)(1)(iii)(A) and (B) define the term "anything of value" (referring to contribution) to include all in-kind contributions. Unless specifically exempted under 11 CFR 100.7(b), the provision of any goods or services without charge or at a charge which is less than the usual and normal charge for such goods or services is a contribution. Examples of such goods or services include, but are not limited to: securities, facilities, equipment, supplies, personnel,

advertising services, membership lists, and mailing lists. If goods or services are provided at less than the usual and normal charge, the amount of the in-kind contribution is the difference between the usual and normal charge for the goods or services at the time of the contribution and the amount charged the political committee. For purposes of 11 CFR 100.7(a)(1)(iii)(A), "usual and normal charge" for goods means the price of those goods in the market from which they ordinarily would have been purchased at the time of the contribution; and usual and normal charge for any services, other than those provided by an unpaid volunteer, means the hourly or piecework charge for the services at a commercially reasonable rate prevailing at the time the services were rendered.

The candidate, frequently accompanied by staff and media personnel, made campaign trips on the Commonwealth's airplane, a Cessna Model S550. The Committee was billed at a rate of \$625 per flight hour plus pilots' expenses, landing fees, etc. Virtually all flight destinations were cities served by regularly scheduled commercial service. Thus, in accordance with 11 C.F.R. §9034.7(b)(5), the Committee was required to reimburse the Commonwealth the first class commercial airfare plus the cost of other services.

As discussed at Section I.D., written requests and subpoenas were issued in an effort to obtain all records related to usage of the airplane and the helicopter. All records requested had not been received as of October 28, 1992.

The Committee did however provide (1) invoices which were annotated to include the identification of the passengers who apparently were on the airplane (in at least one instance, one passenger was not listed for a trip), (2) a typed flight itinerary (3) photocopies of billings issued by the Committee to the media, and (4) photocopies of reimbursement checks received. Records related to the computation of the amounts billed by the Commonwealth, the formal passenger manifest, and a complete accounting of all campaign related trips (in whole or in part) had not been provided by the Commonwealth.

As previously stated, on December 15, 1992, the Commission authorized the Office of General Counsel to file a civil suit against the Commonwealth for subpoena enforcement. Prior to filing, the Commonwealth was granted ten days to comply with the subpoena. The Audit staff received, from the Office of General Counsel, the Commonwealth's response on January 8, 1993. Included in the response were copies of flight log information for use of the Commonwealth's plane, despite repeated allegations that the documents responsive to the subpoena had been previously forwarded to the Audit staff as part of the presidential audit process and/or did not exist.

The Audit staff analyzed the information in hand in an effort to determine if the \$625 per hour charge equated to first class airfare. Based on our analysis of 54 trip legs (17

complete trips), the Commonwealth "underbilled" the Committee by approximately \$25,847. Further, the Audit staff identified two campaign-related trips (November 20, 1991 and December 4, 1991) for which no flight logs were made available for review.

In the interim audit report, the Audit staff recommended that the Committee:

- provide flight log information generated by the Commonwealth for campaign-related trips on the two dates noted above;
- demonstrate that the Commonwealth did not underbill the Committee in the amount of \$25,847; or
- make a payment to the Commonwealth in the amount of \$25,847.

Further recommendations will be forthcoming.

In response to the interim audit report, Counsel for the Committee disputes the Audit Division's recommendation that it make a payment to the Commonwealth of Virginia for the amount determined to be underbilled.

Counsel states, in relevant part, that:

"the Committee used the Commonwealth of Virginia's plane for campaign-related travel on several occasions. As required by the Commonwealth, Wilder for President reimbursed the Commonwealth of Virginia at the rate of \$625.00 per hour of plane use plus pilot and miscellaneous expenses. Due to a conflict between federal and state methods for calculating reimbursements in connection with the use of Commonwealth aircraft, the Audit Division preliminarily concluded that the Committee must pay the Commonwealth of Virginia an additional \$25,847.04 for the use of the state plane. The Committee disputes the Audit Division's position that the Committee pay the Commonwealth of Virginia an additional \$25,847.04. The Audit Division's underlying analysis and calculations are flawed. Therefore, the alleged repayable amount of \$25,847.04 pursuant to federal regulations is erroneous for various reasons.

The Committee disputes the Audit Division's payment amount of \$25,847.04 based upon its use of the General Services Administration first-class airfare. The Audit Division used General Services Administration's first class

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airfare as the standard first class airfare to determine the cost per leg. The Regulations do not dictate that first class airfare be based on GSA's determination of first class airfare. The Regulations only require that payment be made to the appropriate government entity in the amount equal to the commercial first class airfare. In fact, there is no standard first class airfare. On any given day, different travel agencies and airlines might provide various first-class commercial airfares. Accordingly, there were most likely other first-class airfares lower than GSA's first class airfare for each particular flight. Therefore, because the first-class airfares that the Audit Division used were not determinative first-class airfares, the alleged repayable amount is highly questionable.

In addition, the Committee strongly objects to the Audit Division's inclusion of the costs of flights which contained no campaign-related passengers. The Audit Division erroneously included in its calculations the costs of flights which are not subject to payment by the Committee under the Regulations. The Audit Division included in its calculations flights which contained only the pilot and no campaign-related passengers..(sic) In these instances, the state plane was sent from Richmond to another city to pick-up Governor Wilder or returned from another city to Richmond without any campaign-related staff..(sic) However, such flight is not a reimbursable flight pursuant to the Regulations because the flight did not contain any campaign-related passengers. The Regulations at 11 C.F.R. 9034.7 clearly state that 'if any individual, including a candidate, uses government conveyance or accommodations paid for by a government entity..' then the candidate'(sic) committee must pay the appropriate government entity an amount equal to the first class commercial airfare plus the cost of other services.' The language 'any individual' clearly does not include the pilot or crew of a plane. In the instant cases, these were the only individuals present on the plane.

In analogous situations, the Audit Division does not require payment for flights like these. For example, when a committee uses

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corporate aircraft, a committee is not required to pay the corporation for the return flight to its origin if the plane is not carrying any campaign-related staff. Similarly, the Committee in the instant cases is not required under federal law to reimburse the government entity for flights which do not contain any individuals on campaign-related business. The Committee reimbursed the Commonwealth of Virginia for such flights pursuant to state policy. However, simply because the Committee makes an expenditure in connection with a state requirement does not permit the FEC to include such flights in its calculations when such flights clearly are not subject to the federal election law. The Audit Division would like to ignore the Committee's state reimbursement method in connection with campaign-related travel in all other instances. Yet in this instance it would like to adopt state policy when state policy requires reimbursement and federal election law requires none. The FEC cannot selectively apply different standards for its own benefit. Most importantly, regardless of state policy, the Regulations, as well as past Commission practice, prohibit the Commission from requiring payment for the costs of such flights. Accordingly, the following flights should not be included in the FEC's \$25,874.04 (sic) figure::(sic)

7/14/91	JFK to Richmond, VA**	\$384.00
7/21/91	Richmond, VA to JFK**	\$384.00
7/27/93(sic)	Richmond, VA to Washington, D.C.	\$325.00
10/19/91	Richmond, VA to San Antonio, TX	\$826.00
11/08/91	Richmond, VA to Washington, D.C.	\$325.00

** This leg of the flight was not campaign-related. Specifically, the July 14, 1991 New York/Richmond leg was not campaign-related. Neither the Governor, nor any other campaign-related staff returned on the plane to Richmond. Governor Wilder went on to his vacation. Similarly, the Richmond-JFK leg on July 21, 1991 was not campaign-related. The plane was sent to New York to pick-up the Governor. By including these two legs, the Audit Division is in direct contradiction to the Regulations and the Audit Division's practice, including non-campaign-related flights.

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The Interim Audit Report also inaccurately stated that the Committee failed to provide certain flight information to the FEC. The Committee strongly disagrees with this statement. The Committee continually forwarded all records in its possession relating to use of the Commonwealth plane to the Commission. The Committee was unable to provide the Commission with documents which were not in its possession. The Committee never asserted that the Commonwealth did not possess information related to the use of the Commonwealth plane. The Committee stated only that the Committee did not possess such information and, therefore, was unable to forward that information to the FEC.

The Audit Division also requested copies of flight logs for November 20, 1991 and December 4, 1991. Flight logs for November 20, 1991 and December 4, 1991 were included in documents previously provided to the Audit Division." (Emphasis in original).

It should be noted that the airfare information, provided by General Services Administration, is selected by utilizing the date of the trip. The date is entered into its computer program^{6/} which selects and prints the available airfares for those carriers providing first class commercial service on the date of the trip. The Audit staff selected lowest unrestricted and non-discounted first class airfare. Counsel's argument that the airfares selected are "not determinative first-class airfares" is, in the opinion of the Audit staff, not persuasive. The Committee did not submit any documentation in support of its argument. Counsel merely states, "there were most likely other first-class airfares lower than GSA's first class airfare for each particular flight."

It should be noted that when the regulation concerning the use of corporate aircraft was adopted in 1976, prior to the deregulation of the airline industry, there was little price variation between carriers for a given trip. Subsequently, in February 1983 a similar regulation concerning the candidate's use of government conveyance was adopted.

6/ Passenger Interline Pricing/Prorate System compiled by the Airline Tariff Publishing Company based at Dulles International Airport

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The Committee is suggesting that a lower (discounted) first class airfare should be used rather than the lowest non-discounted and unrestricted first class airfare.^{7/} It is the opinion of the Audit staff that the Committee's position is not a reasonable interpretation of the intent of the regulation given that the service provided is not subject to the pre-established routes and schedules of commercial carriers.

In the interim audit report, the Audit staff charged an equivalent of one first-class airfare in instances where the Commonwealth's plane traveled, without passengers, to/from a campaign-related event. Counsel's argument that the Committee reimbursed the Commonwealth for the these flights pursuant to state policy and such expenditures do "not permit the FEC to include such flights in its calculations when such flights clearly are not subject to federal election law" is incorrect. In accordance with 11 C.F.R. 9034.7(a), any expenditures made for travel relating to the campaign of a candidate seeking nomination for election to the office of President, shall, pursuant to the provisions of 11 C.F.R. 9034.7(b), be qualified expenses and be reported by the candidate's authorized committee(s). Thus, the flights, corresponding reimbursements, and all supporting documentation are subject to federal election law and, accordingly, were reviewed by the Audit staff.

Nonetheless, the Audit staff has removed the five legs in question from its analysis for various reasons, which reduced the amount underbilled from \$25,847 (interim audit report) to \$25,414 (see Attachment 4).

The Audit staff determined that the July 14, 1991 and July 21, 1991 trips (Richmond to New York to Richmond) were not campaign-related. See discussion at Finding III.C.4..

The July 27, 1991 and November 8, 1991 legs (Richmond to Washington, D.C.) were flights by the Commonwealth's plane (empty) to provide the Governor with transportation back to Richmond or onto another campaign-related event. The Audit staff determined that the difference between the amount reimbursed by the Committee and the correct billable amount calculated by the Audit staff is minimal. Therefore, the legs and associated costs were removed from our analysis.

^{7/} The airfare information provided by General Services Administration Transportation Audit Division contains first class airfares with no accompanying provisions and/or conditions (code F). It also contains lower first class airfares for night travel (code FN), and other discounted and/or restricted service (code F9, F28, etc.).

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The Richmond to San Antonio leg on October 19, 1991 was also removed from our analysis. In this instance the Governor was in San Antonio, TX for a campaign-related event. The Commonwealth's plane traveled (empty) from Richmond to San Antonio to provide transportation for the Governor and other campaign-related individuals back to Richmond. However, according to Counsel, the state policy requires the Committee to reimburse the state for the initial leg (Richmond to San Antonio). The flight log provided by the Commonwealth indicates 4.1 flight hours recorded for this leg, therefore, the Committee should have reimbursed the Commonwealth for \$2,563 (4.1 hours x \$625 per hour). There was no evidence of a billing by the Commonwealth nor a reimbursement by the Committee.

As a result, the Committee must reimburse the Commonwealth \$2,563.

As stated above, the Audit staff's requests for documentation were routinely delayed throughout the audit process. See discussion at Section I.D. It should be noted that the Committee never asserted that the "official flight logs" were not in the possession of the Commonwealth. However, Counsel for the Committee did state that an "itinerary" and "manifest" did not exist.

Further, Counsel argues that the flight logs for November 20, 1991 and December 4, 1991 were included in documents previously provided to the Audit Division. The Commonwealth's submission of flight logs on January 8, 1993 did not include these flight logs. The flight logs were received by the Audit staff in the Committee's response dated December 13, 1993.

The Committee has not complied with the above stated recommendation. Therefore, it remains the opinion of the Audit staff that the Committee should be required to reimburse the Commonwealth of Virginia \$27,977 (\$25,414 + \$2,563).

Recommendation #3

The Audit Division recommends that the Commission determine that the Committee reimburse the Commonwealth of Virginia \$27,977.

2. Telephone and Credit Card Usage

The Committee paid the Treasurer of Virginia \$5,000 for use of the Governor's office phone lines, and \$4,853 for reimbursement of travel expenses charged on a credit card. The only information provided related to the phone reimbursement was an invoice from the Office of the Governor, dated December 31, 1991, with the following description "Use of Governor's Office phone lines by Wilder for President campaign." No photocopies of

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phone bills or other documents were made available to show when the calls were made, the charges for the calls and the itemization of campaign vs. non campaign-related calls.

A Committee representative stated that the Governor did not wish to make available the telephone numbers called.

On November 20, 1992, the Audit Division received, from the Office of General Counsel, the Committee's supplemental response to the subpoenas. The response included a typed worksheet that recaps categories of cost (i.e., Monthly Recurring Charges, Scats, Toll Calls, Other Charges, and Message Units/Extended Area). The amounts contained on the worksheets are supported by copies of monthly "Commonwealth of Virginia - Interagency Transfer Invoice for Telephone Service", which detail the same categories of cost that appear on the worksheets.

The Committee uses the average cost of scats, toll calls, other charges, and message units/extended area for a 4 month period (August 28, 1991 through December 28, 1991) it considers the "campaign period" and compares it to the average cost of similar charges for a 6 month period (January 28, 1991 through July 27, 1991) which precedes the "campaign period". The Committee then takes the average increase of each category, multiplies it by 4, and arrives at the cost the Committee should reimburse the Commonwealth, for use of phones.

The calculation is deficient for a number of reasons:

- billing information for the period July 28, 1991 through August 27, 1991 is missing, and not used in the Committee's analysis.
- billing information for the period December 29, 1991 through January 27, 1992 is missing, and not used in the Committee's analysis.
- the Committee considers the "campaign period" to be August 28, 1991 to December 28, 1991. However, the Candidate's exploratory committee registered in March 1991 and the campaign ended in January 1992 (the Candidate's DOI is 1/8/92). Further, an apparent one time charge ("other charges" September 1991 at \$2,535) could be a direct charge to the Committee because it appears to be for some increased level of activity, possibly additional telephone lines.
- the Committee did not include in its analysis any charge or average charge for the cost of the "Monthly Recurring Charges", which under its analysis would increase the amount due the Commonwealth of Virginia by approximately \$1,200.

- the Committee did not include in its analysis any charge or average charge for Federal, State, or local taxes normally associated with monthly telephone cost.

The Committee submitted additional documentation on December 21, 1992. Specifically, the Committee submitted typed worksheets and copies of monthly "Commonwealth of Virginia - Interagency Transfer Invoice for Telephone Service", that support its worksheets, for the period April 1990 through February 1992. However, the Committee has revised its previous calculation (of \$5,104) and determined that the amount owed the Commonwealth for use of its telephones was \$3,345. The Committee calculated the average cost of scats, toll calls, other charges, and message units/extended area for the four month period and compared it the average cost of similar charges for the preceding 17 months and the subsequent 3 months following the "campaign period". It is the opinion of the Audit staff that the revised calculation is even less representative of the actual cost of campaign related telephone usage than its previous calculation. As a result, the Audit staff will not consider the revised calculation in the discussion that follows. Further, the Committee has also stated that telephone bills itemizing long distance calls were not (and at this stage cannot be) annotated as to whether a particular call was campaign related or official business of the Governor.

Absent the itemized phone bills, the Audit staff has analyzed the charges noted on the interagency transfer invoices for an 11 month period beginning March 1991 through January 1992, versus the same charges for the preceding 11 months (April 1990 through February 1991). According to the documentation made available, the cost of the Governor's office telephones for the 11 month period from April 1990 through February 1991 totaled \$49,373. The cost of telephones for the 11 month period during which the Candidate's campaign was active totaled \$57,244, an increase of \$7,871.

The difference between the amount calculated by the Audit staff (\$7,871) and the amount initially calculated by the Committee (\$5,104) is as follows:

- the Audit staff compared all costs noted on the interagency transfer invoices, where as the Committee did not include the "Monthly Recurring Charges".
- the Audit staff considered the relevant period to be March 1991 through January 1992, the Committee considered the "campaign period" to be September 1991 through December 1991.
- the Audit staff compared costs incurred during the 11 month active campaign period to costs incurred during the preceding 11 months. The Committee compared costs

incurred during a 4 month period to costs incurred during a 6 month period which precedes, but not sequentially, its four month "campaign period".

It is our opinion that, based on the documentation made available, the Audit staff's calculation reasonably reflects the amount of campaign-related usage of the Commonwealth's telephones. However, the interagency transfer invoices do not include the cost of Surcharges on equipment, Federal excise taxes, and local taxes, which are normally associated with telephone bills and, if incurred, should be prorated between the Committee and the Governor's office.

On January 15, 1992, the Committee reimbursed the Treasurer of Virginia \$4,853 for its use of the Governor's credit card, a "Visa Business Card". In support of the payment the Committee submitted a schedule of 8 charges totaling \$2,693, a page from the December 1991 (closing date) billing statement, and receipts for 7 of the charges totaling \$2,321. Documentation for credit card charges totaling \$2,532 (\$4,853 - 2,321) has not been made available.

As a result, the undocumented portion, \$2,532, of the above payment is considered a non-qualified campaign expense (see Finding III.C.3.).

In the interim audit report, the Audit staff recommended that the Committee:

- with respect to the use of telephones, make a payment to the Commonwealth of \$2,871 (\$7,871 - 5,000) plus an amount that represents the increase in surcharges on equipment, federal excise taxes, and local taxes for the periods noted above; documentation to show the additional costs and the Committee's calculations are to be provided to the Audit staff; and
- with respect to the use of the credit card, provide documentation to support the \$2,532 in apparent credit card charges.

The Committee did not address these matters in its response to the interim audit report. It remains the opinion of the Audit staff that the Committee should be required to reimburse the Commonwealth of Virginia \$2,871 for use of telephones and provide documentation which identifies the costs of surcharges on equipment, Federal excise taxes, local taxes, and any other costs for the period April 1990 through January 1992; the undocumented credit card payment of \$2,532 represents a non-qualified campaign expense (see Finding III.C.3. for disposition).

Recommendation #4

The Audit Division recommends that the Commission determine that the Committee reimburse the Commonwealth of Virginia \$2,871.

3. Campaign-Related Services of Governor's Press Secretary

The Committee by check dated January 15, 1992, paid the Commonwealth \$7,795, which according to information made available represented reimbursement for the services of the Governor's Press Secretary during the last quarter of calendar year 1991. According to a photocopy of an undated, unsigned document entitled "Glenn Davidson Worksheet," reimbursement was requested for 1/3 of Mr. Davidson's salary and benefits paid by the Commonwealth for the three month period. According to the worksheet, 1/3 of his time was "campaign" [related] and 2/3 was "State" [not campaign-related]. No information was made available with which to verify the various amounts listed or the time spent on the campaign.

On November 12, 1992, the Committee submitted documentation from the Commonwealth which details Glenn K. Davidson's 1991 salary plus the value of fringe benefits. In addition, Mr. Davidson submitted a signed statement, on Commonwealth letterhead, dated November 3, 1992, that states:

"I did not maintain any records regarding what percentage of my daily activities were campaign-related versus the percentage of time that was strictly in connection with State business (as I was not required to do so). However, to the best of my judgment and recollection, two-thirds of my work-related time was spent on State business, and the remaining one-third was campaign-related."

In the interim audit report, the Audit staff recommended no further action on this matter.

E. Use of Corporate Aircraft

Section 114.9(e) of Title 11 of the Code of Federal Regulations states, in part, that a candidate, candidate's agent or person traveling on behalf of a candidate who uses an airplane which is owned or leased by a corporation, other than a corporation licensed to offer commercial services, for travel in connection with a Federal election must, in advance, reimburse the corporation - in the case of travel to a city served by regularly scheduled commercial service, the first class air fare; in the case of travel to a city not served by regularly scheduled commercial service, the usual charter rate.

On three separate occasions, aircraft owned by corporations were used for campaign-related travel. The Audit staff reviewed the documentation made available by the Committee

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and identified three payments to three corporations totaling \$3,768. It must be noted that the Audit staff was unable to determine the actual amount billed to the Committee, since no corporate invoices were made available for review.

Notwithstanding the above, the Audit staff attempted to analyze the information in hand and determine whether the activity was conducted in accordance with 11 CFR 114.9(e). All three flight destinations were to cities served by regularly scheduled commercial service. Thus, in accordance with 11 CFR 114.9(e), the Committee was required to reimburse, in advance, the first class commercial airfare plus the cost of other services.

The Audit staff utilized airfares obtained from the General Services Administration Transportation Audit Division. The fares represent the lowest non-discounted and unrestricted first class rates available on the dates of the flights. Based on the Audit staff's analysis of six trip legs (three complete trips) identified, the respective reimbursements made by the Committee appear to be \$6,318 less than the required reimbursement amount.

The first class rate used by the Committee to calculate the reimburseable amount appears to be understated. Further, the Committee did not include several passengers in their calculation of the reimburseable amount.^{8/} Information available did not provide any indication as to whether these passengers were traveling on campaign related or non-campaign related business. In the absence of documentation to the contrary, the Audit staff has included the cost of these individuals' travel as campaign-related.

In the interim report, the Audit staff recommended that the Committee provide the following:

- invoices generated by the corporations which detail, with supporting documentation, the amount billed to the Committee;
- information generated by the corporations which lists the passengers on each aircraft and an annotation by the Committee or the Corporations, as appropriate, which details whether the passengers were considered as traveling on official or campaign-related business and the basis for such determination;
- demonstrate that this activity is in accordance with 11 CFR 114.9(e); or

^{8/} The documentation made available during the fieldwork referred to a certain number of passengers on each flight. However, the same documentation submitted 10 days subsequent to the exit conference, annotated with names of additional passengers on each flight.

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- make a payment to the United States Treasury in the amount of \$6,318.

The Committee submitted documentation which included letters and flight logs from two corporations and a letter from the third corporation which identified each leg of the flight and the passengers aboard. The Committee also submitted a memorandum from its National Scheduling Director which described steps taken by the Committee to obtain the first class airfares used.

The Committee's response states, in part,

"Neither the FEC's regulations nor the FEC Financial Control and Compliance Manual for Presidential Primary Candidates Receiving Public Financing, (January 1992 edition), require, or even suggest, that campaign committees obtain first-class airfares from a particular source such as the General Services Administration. In each of the instances under review by the Audit Division, the Committee used due diligence in obtaining first-class fares from a reputable travel agency. Since the figures used by the Committee are actual legitimate first-class fares, the Audit Division should apply these fares in determining whether there was any under payment. 2/ Nothing obligates the Committee to use anything but the lowest first-class airfare applicable." [footnote omitted]

Based on our review of the documentation generated by the corporations, the Audit staff was able to identify all passengers traveling on the corporate aircraft. Consequently, the Committee's cost was recalculated; the amount now viewed as underbilled is \$1,614.

The Committee's contention that the lowest first class airfare may be used is, in the opinion of the Audit staff, contrary to the regulation's intent.

This regulation, adopted in 1976, set the standard - the [singular] first class airfare is to be used as a basis to determine the amount reimbursed. 9/ First class was selected apparently in an attempt to equate a non-scheduled corporate aircraft trip to that of a scheduled commercial flight with the same origin and destination points.

9/ Generally, there was little price variation between carriers for a given trip prior to the deregulation of the airline industry.

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The Committee is suggesting that a lower (discounted) first class airfare should be used rather than the lowest non-discounted and unrestricted first class airfare.^{10/} It is the opinion of the Audit staff that the Committee's position is not a reasonable interpretation of the intent of the regulation given that the service provided is not subject to the pre-established routes and schedules of commercial carriers.

Nevertheless, since the identified level of this type of activity was minimal and the calculated "underpayment" (\$1,641) is insignificant when compared to total campaign activity, the Audit staff believes further action is not warranted.

III. Findings and Recommendations - Repayment Matters

A. Determination of Net Outstanding Campaign Obligations

Section 9034.5(a) of Title 11 of the Code of Federal Regulations requires that within 15 calendar days after the candidate's date of ineligibility, the candidate shall submit a statement of net outstanding campaign obligations which contains, among other items, the total of all outstanding obligations for qualified campaign expenses and an estimate of necessary winding down costs. Subsection (b) of this section states that the total of outstanding campaign obligations shall not include any accounts payable for non-qualified campaign expenses.

In addition, 11 C.F.R. §9034.1(b) states, in part, that if on the date of ineligibility a candidate has net outstanding campaign obligations as defined under 11 CFR 9034.5, that candidate may continue to receive matching payments provided that on the date of payment there are remaining net outstanding campaign obligations.

Governor Wilder's date of ineligibility was January 8, 1992, the date on which he concluded his campaign to seek the Democratic nomination. The Audit staff reviewed the Committee's financial activity through 8/12/93, analyzed estimates of winding down costs prepared by the Committee through 8/12/94 and developed the figures shown below.

^{10/} The airfare information provided by General Services Administration Transportation Audit Division contains first class airfares with no accompanying provisions and/or conditions (code F). It also contains lower first class airfares for night travel (code FN), and other discounted and/or restricted service (code F9, F28, etc.).

Audit Analysis of Wilder for President Committee
NOCO Statement, as of 1/8/92

ASSETS

Cash in Bank	\$336,977	
Accounts Receivable	19,448	
Capital Assets	<u>15,452</u> a/	
Total Assets		\$371,877

LIABILITIES

Accounts Payable for Qualified Campaign Expenses	\$249,268 b/	
Amount Due the Commonwealth of VA	30,848	
Winding Down Cost 1-9-92/8-12-94		
Salaries/Consulting Fee (including pre-ineligibility commitments)	60,880 c/	
Fundraising Costs	1,257	
Legal Fees & Expenses	87,027 d/	
Rent	4,988	
Administrative Costs (phone; supplies, furniture rental, etc.)	1,324	
Accounting Fees	640	
Amounts Due U.S. Treasury	<u>9,084</u> e/	
Total Liabilities		<u>445,316</u>
Deficit		<u>\$(73,439)</u> f/

Notes to NOCO Statement Analysis

- a/ This figure represents the value of a lease buyout of \$6,938 (paid on January 29, 1992) and prepaid lease payments for the period January 11, 1992 through April 11, 1992 totaling \$8,513. The total of these two values does not foot to the NOCO statement due to rounding.
- b/ This figure represents \$134,669 of the \$225,759 shown by the Committee; \$91,090 is excluded due to lack of adequate supporting documentation. Also included is \$106,753 in additional qualified accounts payable developed by the Audit staff based on our review of payments made 1/9/92-6/30/92. In response to the interim audit report the Committee provided documentation for expenses totaling \$7,846. Should the Committee provide adequate documentation, the accounts payable figure will be adjusted accordingly.
- c/ This figure represents: (1) cases where the actual amounts paid to certain individuals were less than estimated amounts to be paid (\$12,725); (2) a case where the estimate (\$22,000) for one individual was later reduced by agreement between the parties; (3) the exclusion of \$17,300 in payments with the stated purpose "Severance" (see Finding III.C.1.); and (4) an overstatement of estimated January payroll (<\$3,702>). In response to the interim audit report the Committee provided documentation for additional payroll expenses totaling \$4,068.
- d/ The Audit staff used actual expenses incurred, and an estimate (\$12,000) of legal expenses necessary to wind down the campaign.
- e/ See Findings II.A. (Excessive Contributions - \$5,100 [\$5,200 - \$100 excessive contribution received after 1/8/92]) and II.B. (Prohibited Contributions - \$3,984).
- f/ The calculated deficit of \$73,439 is based on certain estimates. Also, approximately \$49,000 in expenses were excluded from the NOCO by the Audit staff due to insufficient documentation (see Attachment 6). Should the Committee provide adequate documentation for any portion of the above amount, the deficit would increase.

B. Calculation of Repayment Ratio

Section 9038(b)(2)(A) of Title 26 of the United States Code states that if the Commission determines that any amount of any payment made to a candidate from the matching fund payment account was used for any purpose other than to defray the qualified campaign expenses with respect to which such payment was made it shall notify such candidate of the amount so used, and the candidate shall pay to the Secretary an amount equal to such amount.

Section 9038.1(c)(1)(v) of Title 11 of the Code of Federal Regulations states, in part, that the Commission will issue an interim audit report to the candidate and his authorized committee. The interim audit report may contain Commission findings and recommendations regarding preliminary calculations with respect to future repayments to the United States Treasury.

Section 9038.2(a)(2) of Title 11 of the Code of Federal Regulations states the Commission will notify the candidate of any repayment determination made under this section as soon as possible, but not later than 3 years after the end of the matching payment period. The Commission's issuance of an interim audit report to the candidate under 11 CFR 9038.1(c) will constitute notification for purposes of the 3 year period.

Section 9038.2(b)(2)(iii) of Title 11 of the Code of Federal Regulations states that the amount of any repayment sought under this section shall bear the same ratio to the total amount determined to have been used for non-qualified campaign expenses as the amount of matching funds certified to the candidate bears to the total amount of deposits of contributions and matching funds, as of the candidate's date of ineligibility.

Pursuant to 11 C.F.R. §9033.5(a), the Commission determined Governor Wilder's date of ineligibility to be January 8, 1992.

The formula and the appropriate calculation with respect to the Committee's receipt activity is as follows:

$$\frac{\text{Total Matching Funds Certified Through}}{\text{The Date of Ineligibility - January 8, 1992}} \\ \text{Numerator Plus Total Deposits Through Date of Ineligibility}$$

$$\frac{\$198,315}{\$198,315 + \$497,969} = .284819$$

Thus, the repayment ratio for non-qualified campaign expenses is 28.4819%.

C. Apparent Non-Qualified Campaign Expenses

Section 9032(9) of Title 26 of the United States Code defines, in part, the term "qualified campaign expense" as a purchase or payment incurred by a candidate, or by his authorized committee made in connection with his campaign for nomination which neither the incurring of nor payment of constitutes a violation of any law of the United States or of the state in which the expense is incurred or paid.

Section 9038.2(b)(2) of Title 11 of the Code of Federal Regulations states, in relevant part, that the Commission may determine that amounts of any payments made to a candidate from the matching payment account were used for purposes other than to defray qualified campaign expenses. The amount of any repayment under this section shall bear the same ratio to the total amount determined to have been used for non-qualified campaign expenses as the amount of matching funds certified to the candidate bears to total deposits, as of the candidates date of ineligibility.

1. Severance Payments Made by the Committee

The Committee paid \$15,300 in severance to 11 individuals on January 29 and 30, 1992 (see Attachment 7). No employment agreements or other documentation was made available with respect to these payments other than the checks themselves and a typed list of payments prepared by the Committee. Five of the individuals continued to receive compensation through June 1992, approximately four months after receiving the severance payments. Generally, the amount of severance paid was approximately equal to one month's compensation.^{11/}

In response to the interim audit report Counsel for the Committee states, in part:

"Immediately following the January 8th announcement, the Committee had to decide how to staff -- both for the short-term and long-term -- its necessary close-down activities and its FEC audit/compliance operations. The short-term activities promised to be particularly time-consuming and delicate -- since prior to January 8th, the Committee was actively expanding, not contracting, its operations and commitments. Among other decisions, the Committee decided to compensate the twelve consultants noted by

^{11/} Two individuals received their first compensation in January 1992; three in December 1991; one in November; three in October; one in August, and one in April.

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Treasurer's signature. Mr. Keough received no prior compensation from the Committee. No information was made available as to the specific duties he performed. A Committee representative stated that the Commission has previously allowed presidential committees to pay severance.

With respect to both the \$15,300 in severance payments and the \$15,000 paid to Ms. Jones (\$10,000) and Mr. Keough (\$5,000), it is the Audit staff's opinion that, based on the information provided to date, these expenses are non-qualified campaign expenses.

With respect to the \$10,000 payment to Ms. Jones, the Committee submitted a memorandum from Ms. Jones to Ms. Kerman (Counsel for the Committee). The memorandum is dated August 11, 1993 and states, in part, the following:

"I (Ms. Jones) have served as a consultant to the Committee from approximately April 1, 1991 through the present, with significant responsibilities regarding managing the Committee's funds, paying the Committee's bills, FEC compliance matters, and the Committee's day-to-day financial affairs... Moreover, I worked with the Committee on a host of other projects ranging from fundraising activities to political events."

The memorandum also states "I charged the Committee \$16,300 for my services covering the period from approximately April 1, 1991 through May 31, 1992 (an approximately 14-month period). I have not billed the Committee for the numerous hours I have spent working on close-down matters from June 1, 1992 through the present (approximately 14 1/2 months)."

It should be noted that Ms. Jones did not charge nor bill the Committee \$16,300 (actually \$16,400) for her services. Specifically, Ms. Jones was paid consulting fees totaling \$2,400 during the period September 1, 1991 through January 21, 1992. Subsequently she billed the Committee \$4,000. According to the bill, Ms. Jones charged the Committee "for services rendered - February 1992 through May 1992." The Committee paid this bill on May 29, 1992. Documentation bears out that this individual was paid for services rendered from September 1991 through May, 1992 and never charged/billed the Committee \$10,000. Finally, the \$10,000 paid by the Committee on January 29, 1992, simply does not fit into the compensation payments to Ms. Jones.

With respect to the \$5,000 payment the Committee submitted a memorandum from William Keough. The memorandum, similar to the memorandum received from Ms. Jones, details various services performed between April 1, 1991 through the present. Mr. Keough also states he accepted \$5,000 for services performed through the end of January 1992.

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It should be noted that the Committee classified this payment as "accounting services" necessary to wind down the campaign. As such, this amount was included by the Committee on its NOCO statement.^{12/} It appears that the Committee is now attempting to reclassify this payment as an accounts payable for qualified campaign expenses, for services rendered during the active phase of the campaign as opposed to its original disclosure as a wind down expense. It is the opinion of the Audit staff that such documentation, received after the fact and contradictory to the Committee's initial classification is not credible nor representative of a qualified campaign expense. Further, Mr. Keough never billed the Committee.

3. Undocumented Disbursements

Finally, the Committee made 11 payments, totaling \$11,582, to individuals/vendors. The necessary supporting documentation for these expenses was not made available for review. As a result, the Audit staff was unable to determine whether the expenses were campaign-related and accordingly, the disbursements were considered non-qualified campaign expenses.

The Committee submitted documentation that demonstrates three payments, totaling \$1,257 (\$400 + \$400 + \$457), were, in fact, campaign-related. In addition, the Committee stated that a \$500 payment to a vendor was never issued. Prior to issuing this check, Committee officials determined that no outstanding balance was owed the vendor and accordingly the check was destroyed.

Further, with respect to two payments, totaling \$3,500, associated with Governor Wilder's birthday celebration on January 17, 1992 (candidate's date of ineligibility is January 8, 1992) the Committee stated the following:

"Both these disbursements were in connection with a Committee event of January 17, 1992 at the Jefferson Hotel that was scheduled and organized prior to Governor Wilder's unexpected termination of his candidacy on the evening of January 8, 1992 (a draft version of the invitation to the January 17, 1992 event, along with the Committee's final changes thereto is attached). Thus, the Governor's termination announcement came only nine days

^{12/} The Committee estimated \$15,000 in accounting expenses necessary to wind down the campaign (Ruth Jones \$10,000 - William Keough \$5,000).

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before the January 17th event, and after a large number of individuals had been invited, and in many instances purchased a ticket(s) to the event.

Under the circumstances, the Committee decided, on or about January 9, 1992, that the most reasonable thing to do was to go forward with the event it had already committed to hold -- but to halt the solicitation of further contributions with respect to the event, and to recharacterize the previously-scheduled fundraiser as also a thank you party for those who worked and volunteered on the campaign.

It should be noted that, in previous audits of presidential campaigns, the Audit Division has expressly classified post-ineligibility thank you parties for campaign staff and volunteers as legitimate winding down expenses and thus qualified campaign expenses (See Audit of 1988 Paul Simon for President Committee, disbursements in connection with December 9, 1988 holiday thank you parties for campaign staff and volunteers -- in particular, disbursement(s) to the Sheraton Washington Hotel in Washington, D.C.)."

Counsel for the Committee states that the event was a "previously-scheduled fundraiser" and that the solicitation of contributions was halted subsequent to the Governor's termination announcement on January 8, 1992. Our review indicates that the Committee did not establish a fundraising code nor designate any contributions as being received as a result of this event.

The Committee noted that post-ineligibility disbursements for "thank you parties for campaign staff and volunteers" by the Simon for President Committee have been classified, by the Audit staff, as qualified campaign expenses.

The Audit staff reviewed the Simon for President workpapers relating to the disbursement in question. The respective documentation does not identify the event as a "thank you party for campaign staff and volunteers". It does, however, indicate that a Christmas party had taken place. This disbursement was not questioned by the Audit staff; however, it remains the Audit staff's opinion that the Committee has not provided documentation to demonstrate that the \$3,500 in identified expenses related to the Governor's birthday celebration represent qualified campaign expenses. No documentation was presented for the remaining five payments totaling \$6,325.

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On April 21, 1994, the Commission considered this matter. Based on the Committee's response and documentation submitted, the Commission determined that the event was campaign-related and the associated expenditures were qualified campaign expenses.

Finally, the Committee submitted documentation with respect to Finding III.D. which resulted in an increase in remaining entitlement as of the date of ineligibility. However, as a result, the period during which matching funds were in Committee accounts was extended from February 12, 1992 to March 3, 1992. During this period, the Audit staff identified two additional non-qualified campaign expenses totaling \$2,814.

4. Use of State Plane

As noted in Finding II.D.1. (Transactions Involving Commonwealth of Virginia), the candidate made campaign trips on the Commonwealth's airplane. The Commonwealth normally billed at a rate of \$625 per flight hour plus pilots' expenses, landing fees, etc. The Audit staff originally included in its analysis a flight from Richmond, VA to New York, NY to Richmond, VA on July 14, 1991 and a similar flight (Richmond to New York to Richmond) on July 21, 1991.

In response to Finding II.D.1., Counsel for the Committee argues, in relevant part, that the return flight from New York to Richmond on July 14, 1991 and the flight from Richmond to New York on July 21, 1991 are not campaign related. Counsel further states:

"Neither the Governor, nor any other campaign-related staff returned on the plane to Richmond. Governor Wilder went on to his vacation. Similarly, the Richmond - JFK leg on July 21, 1991 was not campaign-related. The plane was sent to New York to pick-up the Governor. By including these two legs, the Audit Division is in direct contradiction to the Regulations and the Audit Division's practice, including non-campaign-related flights."

It should be noted that the Committee paid \$1,385 for the July 14, 1991 trip and \$1,400 for the July 21, 1991 trip. According to a newspaper article in The Washington Post on July 26, 1991 entitled, "VA. Flew Wilder to N.Y. - Governor to Repay the State \$2,689", Governor Wilder flew from Richmond to New York on July 14, 1991 and then to Switzerland via a commercial flight. The state plane returned to New York on July 21, 1991 to pick up Governor Wilder for the return trip to

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Richmond. The Governor's Press Secretary Laura Dillard is quoted as saying "The state will bear no expense for the governor's vacation." A similar article in the August 1, 1991 edition of The Washington Times states Governor Wilder has said he will pay back the state the \$2,700 cost.

As stated, Counsel for the Committee believes the New York to Richmond flight on July 14, 1991 and the Richmond to New York flight on July 21, 1991 should not be included in the analysis since neither flight represents a campaign-related trip.

Based on the above the Audit staff agrees with Counsel. However, it is our opinion that since the return trip (New York to Richmond) on July 14, 1991 is not campaign-related and the apparent purpose of the initial leg (Richmond to New York) was to transport Governor Wilder to New York for a connecting commercial flight to Switzerland for a vacation, then the entire trip (Richmond to New York to Richmond) is not campaign-related.

With respect to the July 21, 1991 trip, it is our opinion that the first leg (Richmond to New York) is not campaign-related and the apparent sole purpose of the return leg (New York to Richmond) was to transport the Governor back to Richmond, therefore, the entire trip (Richmond to New York to Richmond) is not campaign-related as well.

Absent evidence to the contrary, it is the opinion of the Audit staff that the trips on July 14 and 21 (1991) are not campaign-related and the costs [\$2,785 (\$1,385 and 1,400)] of such trips represent non-qualified campaign expenses.

In summary, eight payments totaling \$11,924 are viewed as non-qualified campaign expenses, repayable to the United States Treasury (see Attachment 8).

Recommendation #5

The Audit Division recommends that the Commission make an initial determination that the Committee make a pro-rata repayment of \$12,026 [$\$42,224 (15,300 + 15,000 + 9,139 + 2,785) \times .284819$] to the United States Treasury.

D. Matching Funds Received in Excess of Entitlement

Section 9038(b)(1) of Title 26 of the United States Code states 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 an amount equal to the amount of excess payments.

Section 9034.1(b) of Title 11 of the Code of Federal Regulations states if on the date of ineligibility a candidate has net outstanding campaign obligations as defined under 11 CFR §9034.5, that candidate may continue to receive matching payments for matchable contributions received and deposited on or before December 31 of the Presidential election year provided that on the date of payment there are remaining net outstanding campaign obligations, i.e., the sum of the contributions received on or after the date of ineligibility plus matching funds received on or after the date of ineligibility is less than the candidate's net outstanding campaign obligations. This entitlement will be equal to the lesser of: (1) the amount of contributions submitted for matching; or (2) the remaining net outstanding campaign obligations.

Based on our analysis of the NOCO statement filed by the Committee, it appears that the candidate was in a deficit position (<\$73,439) on his date of ineligibility. After applying private contributions received during the period 1/9/92 through 2/4/92, the Candidate was entitled to \$71,679 of the \$90,711 matching fund payment received on 2/4/92.

Therefore, the Candidate received \$19,032 in excess of the amount to which he was entitled.

Recommendation #6

The Audit Division recommends that the Commission make an initial determination that the Committee was not entitled to \$19,032 in matching funds received on February 4, 1992 pursuant to 11 C.F.R. §9038.2(b)(1)(i), and that the Committee repay \$19,032 to the United States Treasury pursuant to 26 U.S.C. §9038(b)(1).

E. Recap of Amounts due the United States Treasury

1.	Payment for Excessive Contributions (Finding II.A.)	\$ 5,200
2.	Payment for Prohibited Contributions (Finding II.B.)	3,984
3.	Apparent Non-Qualified Campaign Expenses (Finding III.C.)	12,026
4.	Matching Funds Received in Excess of Entitlement (Finding III.D.)	19,032
	Total Amount Due	<u>\$40,242</u>

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Adjusted Receipts
(Through December 31, 1993)

Dem/Indiv	Federal Matching Funds	Individual Contributions Minus Refunds	PAF's and Other Funds Contributions Minus Refunds	Contributions from the Candidates	Candidate Loans Minus Repayments	(Other Loans Minus Repayments)	Other Receipts	Adjusted Total Receipts
Larry Agren	\$768,881	\$331,831	\$0	\$500	\$5,000	\$1,078	\$2,893	\$810,814
Jerry Brown	\$4,238,345	\$5,178,336	\$0	\$0	\$0	\$0	\$4,863	\$9,420,374
Tim Clinton	\$12,518,130	\$24,883,888	\$7,478	\$0	\$0	\$1	\$14,385	\$37,518,833
Tom Harkin	\$2,103,312	\$3,088,288	\$415,570	\$0	\$0	\$0	\$14,283	\$5,613,471
Rob Kerry	\$2,188,284	\$3,813,332	\$348,787	\$0	\$0	(\$1,225)	\$5,831	\$6,486,079
Lyndon LaRouche	\$0	\$1,803,818	\$0	\$0	\$0	\$0	\$21	\$1,803,839
Paul LePage	\$3,038,388	\$5,058,828	\$3,588	\$0	\$48,000	(\$8,175)	\$0	\$8,134,609
Thom Vanden	\$788,078	\$508,518	\$750	\$0	\$0	\$0	\$1,038	\$1,296,334
Total Democrats	\$24,857,218	\$44,883,347	\$772,872	\$500	\$80,000	(\$9,770)	\$43,388	\$70,186,720
Republicans								
Patrick Buchanan	\$4,988,083	\$7,187,808	\$24,780	\$0	\$0	\$0	\$21,118	\$12,203,654
George Bush	\$10,858,113	\$27,088,825	\$44,250	\$0	\$0	\$0	\$222,308	\$38,013,894
David Duke	\$0	\$228,715	\$0	\$0	\$1,000	\$0	\$0	\$271,815
Total Republicans	\$15,846,196	\$34,481,348	\$69,030	\$0	\$1,000	\$0	\$223,421	\$50,488,365
Other Party								
Andre Marrou	\$0	\$582,778	\$181	\$118	\$15,000	\$0	\$0	\$578,087
Lenora Fisher	\$1,835,524	\$2,201,877	\$0	\$328	(\$1,258)	\$1,200	\$0	\$4,137,388
Total Other Party	\$1,835,524	\$2,784,347	\$181	\$441	\$13,742	\$1,200	\$0	\$4,715,425
Grand Total	\$27,751,238	\$81,885,842	\$841,253	\$841	\$94,742	(\$9,570)	\$266,776	\$128,371,220

**Adjusted Disbursements
(Through December 31, 1953)**

	Operating Expenses Various Objects	Exempt Fundraising Various Objects	Exempt Legal/Accounting Various Objects	Other Disburse	Adjusted Total Disbursements	Expenditures Subject to Limit	Unsett Cash On Hand	Debit Credited By the Company
Disbursements								
Larry Agren	\$600,710	\$0	\$0	\$95	\$600,813	\$613,830	\$2,432	\$5,170
Jerry Brown	\$6,306,453	\$2,278,938	\$272,023	\$108,584	\$9,966,998	\$6,600,402	\$100,110	\$0
Tom Christen	\$25,460,170	\$5,524,000	\$2,060,177	\$0	\$33,044,347	\$25,608,970	\$1,282,703	\$44,713
Tom Hurdin	\$4,003,103	\$1,144,000	\$100,033	\$0	\$5,247,136	\$3,120,315	\$215,010	\$153,714
Paul Kiersey	\$5,101,450	\$1,070,970	\$170,011	\$23,404	\$6,466,835	\$6,050,401	\$0,002	\$0
Frank L. Knudsen	\$1,523,524	\$0	\$45,140	\$0	\$1,609,664	\$1,483,210	\$3,223	\$27,103
Paul Langens	\$6,770,010	\$754,070	\$100,700	\$0	\$7,710,780	\$7,001,566	\$20,101	\$107,472
Living Weller	\$700,300	\$0,000	\$0	\$0	\$700,300	\$700,001	\$0,103	\$0
Total Disbursements	\$50,000,022	\$10,705,400	\$3,703,313	\$132,003	\$65,541,738	\$51,290,727	\$1,700,470	\$430,252
Repayments								
Frankie Matheson	\$11,027,011	\$0	\$0	\$0	\$11,027,011	\$11,027,013	\$605,207	\$0
George Bush	\$27,427,061	\$5,820,322	\$4,001,473	\$70,310	\$37,918,166	\$27,427,068	\$60,110	\$10,014
David Duke	\$353,030	\$0	\$0	\$1,000	\$354,030	\$0	\$0	\$20,250
Total Repayments	\$39,000,700	\$5,820,322	\$4,001,473	\$71,310	\$49,093,814	\$39,024,080	\$714,403	\$40,004
Other Funds								
Andre Marceau	\$415,570	\$100,210	\$0	\$0	\$515,780	\$0	\$0	\$0
Lenore Elders	\$4,203,022	\$0	\$0	\$3,235	\$4,206,257	\$4,204,555	\$2,970	\$0
Total Other Funds	\$4,618,592	\$100,210	\$0	\$3,235	\$4,722,037	\$4,204,555	\$2,970	\$0
Grand Total	\$94,004,720	\$10,477,009	\$8,074,706	\$200,037	\$120,760,182	\$94,540,150	\$2,427,052	\$407,110

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Wilder for President Committee
Schedule of Apparent Excessive Contributions

Contributor	Date of Deposit	Amount of Contribution	Total Contribution	Amount Excessive
1. Thomas J. Berenguer 646 S. Atlantic Ave. Virginia Beach, VA 23451	15-Apr-91	\$1,000	\$4,000	\$3,000
	15-Apr-91	\$1,000		
	15-Apr-91	\$1,000		
	15-Apr-91	\$1,000		
2. Mary Freeman Cheek 4703 Pocahontas Ave. Richmond, VA 23226	30-Sep-91	\$1,000	\$1,100	\$100
	10-Dec-91	\$100		
3. Reginald C. Jackson, MD P.O. Box 26084 Richmond, VA 23260	11-Nov-91	\$1,000	\$2,000	\$1,000
	05-Dec-91	\$1,000		
4. H.B. Mack 370 W. Passaic ST Rochelle Park, NJ 07662	13-Dec-91	\$2,000	\$2,000	\$1,000
5. Lawrence D. Wilder, Jr. 2509 E. Broad ST Richmond, VA 23223	13-Nov-91	\$500	\$1,100	\$100
	20-Dec-91	\$500		
	12-Feb-92	\$100		
----- Total:				\$5,200 -----

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Wilder for President Committee
Sample Exceptions - Apparent Prohibited Contributions

Contributor	Date of Incorporation	Check Date	Amount
1. Asprey 726 Fifth Avenue New York, New York 10022	07-May-91	05-Nov-91	\$250
2. J.Kopf CMA Enterprises LTD 304 Park Avenue South New York, New York 10010	23-Oct-79	20-Nov-91	\$1,000
3. Lindley T. Smith, MD, PC Ophthalmology Second & Franklin ST, Ste 102 Richmond, VA 23219	01-Feb-80	ILLEGIBLE	\$250
----- Total:			\$1,500 -----

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MEMORANDUM FOR PRESIDENT'S COMMITTEE
 ANALYSIS OF COMMITTEE'S USE OF COMMERCIAL PLANE
 (Reimbursements to Commonwealth of Virginia compared to first class airfare for trip)

(1) Date of Trip	(2) Depart/Arrive	(3) # of Passengers (B)	(4) (5) (6) (7) (8) (9) (10) (11) (12) (13) (14) (15) (16) (17) (18) (19)									
		Private-Staff (P1) (P2) (P3) (P4)	Total # Flight hours (10)	Other Trip/Leg Expenses (9)+(10)	Invoices Total (12)	Index See CR/A.B. (13)	Cost of Use Class per Charter (14)	Cost of Charter (15)	No. of Staff (16)	Total Cost per Leg (17)	Total Class Cost (Sum of Leg Totals) (18)	Amt. VA Under-billed (19)
1 03-May-91	1. Richmond VA to Des Moines IA	2	2.9	\$1,812.50			\$474.00		2	\$1,348.00		
2 04-May-91	2. Des Moines IA to Richmond VA	2	2.1	\$1,312.50	\$136.00		\$474.00		2	\$1,348.00	\$2,696.00	(\$627.00)
3	Pilot's expenses	2			\$61.20	\$3,323.00						
4	Catering for passengers				\$93.75	\$904.25		\$340.00	2	\$680.00		
5 05-May-91	3. Richmond VA to Cleveland OH	2	1.3	\$812.50			\$466.00		3	\$1,398.00		
6	Pilot's expenses (one day)				\$93.75							
7	PILOT'S expenses (one day) OH to Williams City OH (PWA)	3	3	\$1,875.00								
8 06-May-91	4. Cleveland OH to Williams City OH (PWA)	3	3	\$1,875.00	\$93.75							
9	Pilot's expenses (one day)				\$53.64	\$2,022.39		\$793.00	3	\$2,379.00	\$5,057.00	\$409.61
10	Catering for passengers	3	2.6	\$1,625.00	\$93.75	\$1,718.75	\$4,657.39					
11 07-May-91	5. Williams City OH (PWA) to Richmond VA	2	1.9	\$1,187.50			\$384.00 (A)		2	\$768.00		
12	Pilot's expenses (one day)	2					\$384.00 (A)		2	\$768.00	\$1,536.00	\$348.50
13 14-Jun-91	6. Richmond VA to Toledo OH	2	1.9	\$1,187.50								
14	Pilot's expenses (one day)	2										
15 16-Jun-91	7. Toledo OH to Richmond VA	2	1.9	\$1,187.50								
16	Pilot's expenses (one day)	2										
17 26-Jul-91	12. Washington D.C. to Richmond VA	1										
18	Washington D.C. to Richmond VA	2	4									
19 14-Jun-91	6. Richmond VA to Toledo OH	2	1.9	\$1,187.50								
20 16-Jun-91	7. Toledo OH to Richmond VA	2	1.9	\$1,187.50								
21 27-Jul-91	12. Washington D.C. to Richmond VA	1										
22	Washington D.C. to Richmond VA	2	4									
23 27-Jul-91	13. Richmond to Miami FL	1										
24	Richmond to Miami FL	2	4									
25 27-Jul-91	14. Miami FL to Orlando FL	1										
26	Miami FL to Orlando FL	2	4									
27 28-Jul-91	15. Orlando FL to Richmond VA	1	3.6	\$2,250.00	\$19.00							
28	Orlando FL to Richmond VA	2	4		\$411.77	\$2,660.77						
29	Richmond VA to Richmond VA	1										
30	Richmond VA to Richmond VA	2	5									
31 19-Oct-91	18. San Antonio TX to Richmond VA	1										
32	San Antonio TX to Richmond VA	2	2									
33 20-Oct-91	19. Richmond VA to Chicago IL	2	1									
34	Richmond VA to Chicago IL	2	1									
35 20-Oct-91	20. Chicago IL to Washington DC	2	1									
36	Chicago IL to Washington DC	2	1									
37 21-Oct-91	21. Washington DC to Tampa FL	2	1									
38	Washington DC to Tampa FL	2	1									
39 22-Oct-91	22. Tampa FL to Richmond VA	2	1									
40	Tampa FL to Richmond VA	2	1									
41 01-Nov-91	24. Richmond VA to Washington DC	2	1									
42	Richmond VA to Washington DC	2	1									
43 04-Nov-91	26. Richmond VA to Washington DC	2	1									
44	Richmond VA to Washington DC	2	1									
45 06-Nov-91	27. Washington DC to Richmond VA	2	1									
46	Washington DC to Richmond VA	2	1									
47 07-Nov-91	28. Washington DC to Richmond VA	2	1									
48	Washington DC to Richmond VA	2	1									
49 08-Nov-91	30. Washington DC to Knoxville TN	2	1									
50	Washington DC to Knoxville TN	2	1									
51 09-Nov-91	31. Knoxville TN to Richmond VA	2	1									
52	Knoxville TN to Richmond VA	2	1									
53	Parting/Landing Fees				\$41.00							
54	Parting/Landing Fees											
55	Parting/Landing Fees											
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REPORT ON REPRODUCIBLE COPIES OF ORIGINALS OF CAMPAIGN'S USE OF COMMERCIAL PLANE
(Reimbursements to Campaigns of Virginia compared to first class airfare for trip)

(1) Date of Trip	(2) Depart/Arrive	(3) # of Passengers (8)	(4) (5) (6) (7) (8) (9) (10) (11) (12) (13) (14) (15) (16) (17) (18) (19)														
		Press+Staff (71)	Other (72)	Other (73)	Other (74)	Leg cost (cl. 8 X \$625/hr) (75)	Expenses (76)	Other (77)	Other (78)	Other (79)	Other (80)	Other (81)	Other (82)	Other (83)	Other (84)	Other (85)	Other (86)
54 15-Nov-91	32. Richmond VA to Winchester MI	4	1														
55	33. Winchester MI to Miami FL	3	1														
56 16-Nov-91	34. Miami FL to Richmond VA	3	1														
57	35. Richmond VA to Detroit MI	2	1														
58 12-Nov-91	36. Detroit MI to Richmond VA	2	1														
59	37. Richmond VA to Boston MA*	3	2	1													
60 20-Nov-91	38. Boston MA to Richmond VA*	3	2	1													
61	39. Richmond VA to Norfolk VA	2	2														
62	40. Norfolk VA to Atlanta GA	2	1														
63	41. Atlanta GA to Milwaukee WI	2	1														
64 21-Nov-91	42. Milwaukee WI to Chicago IL	2	1														
65	43. Chicago IL to Davenport IA	2	1														
66 22-Nov-91	44. Davenport IA to Salem AL	2	1														
67	45. Salem AL to Richmond VA	2	1														
68	46. Richmond VA to Concord NH*	2	1														
69	47. Concord NH to Berlin NH**	0	0														
70 04-Dec-91	48. Berlin NH to Virginia Beach VA	2	1														
71	49. Virginia Beach VA to Washington DC	2	1														
72	50. Washington DC to Richmond VA	1	0														
73 04-Dec-91	51. Richmond VA to Concord NH*	1	2	1													
74 05-Dec-91	52. Concord NH to Boston MA**	0	0														
75	53. Boston MA to Washington DC	0	0														
76	54. Washington DC to Richmond VA	1	2	1													
77 19-Dec-91	55. Richmond VA to Concord NH	1	2	1													
78	56. Concord NH to Washington DC	0	0														
79	57. Washington DC to Richmond VA	1	2	1													
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ATTACHMENT

7

Page 47 of 52

06-Apr-94

Reimbursements to Campaigns of Virginia compared to first class airfare for trip

Press+Staff (71) Other (72) Other (73) Other (74) Leg cost (cl. 8 X \$625/hr) (75) Expenses (76) Other (77) Other (78) Other (79) Other (80) Other (81) Other (82) Other (83) Other (84) Other (85) Other (86) Other (87) Other (88) Other (89) Other (90) Other (91) Other (92) Other (93) Other (94)

Other - not identified as campaign related, no reason given for non campaign related

9501019203

FAP

**WELTER FOR PASSENGER COSTS
 ANALYSIS OF COMMERCIAL USE OF COMMERCIAL FLIGHTS
 (Subcommittee on Commonwealth of Virginia
 compared to first class airfare for trip)**

(1) Date of Trip	(2) Depart/Arrive	(3) # of Passengers	(4) Passenger's (71) (72) (73)	(5) Other (74)	(6) Total (75)	(7) Total (76)	(8) Total (77)	(9) Total (78)	(10) Total (79)	(11) Total (80)	(12) Total (81)	(13) Total (82)	(14) Total (83)	(15) Total (84)	(16) Total (85)	(17) Total (86)	(18) Total (87)	(19) Total (88)	

95 (F) Note for chartering with Omega Citation Bravo Jet from Commonwealth of Virginia

96 (F) Note information from General Services Administration - Transportation Audit Division (1998 - Passenger Mileage Tracking/Reporting System)

97 (A) Airfare based on a flight to the nearest city, en route, which is served by a direct commercial flight. For example, there was no commercial service to Richmond, VA in log #6 & #7 thus, the GSA representative used airfare from Richmond to Lynch.

98 (A) Airfare based on a flight between two locations with an intermediate landing point. For example, there was no direct commercial flight from Tampa to St. Louis; thus, the GSA representative used airfare from Tampa to Kansas City to St. Louis

99 (A) The flight log information provided from the Commonwealth did not provide any information regarding these flights; flight information was taken from the Committee's itinerary and accompanying invoices from the Commonwealth.

100 (A) No cost was calculated for these flights, distance was immaterial.

101 (A) The total passengers used in each log of the analysis corresponds to the total passengers listed on the Commonwealth's flight log for that log. In order to identify which passengers were "staff", "press", and "other", the auditor used the invoices from the Commonwealth and itinerary provided by the Committee. IT MUST BE NOTED THAT THE PASSENGERS LISTED ON THESE INVOICES MAY NOT BE IDENTICAL TO THE PASSENGERS FOR THE FLIGHT LOG AND FOR THE ITINERARY/INVOICES.

Wilder for President Committee
Schedule of Payments to the Treasurer of Virginia

(2)

131

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(1) Date of Payment	Service Provided	Amount
1	28-Jun-91 Use of VA facility	\$1,257.34
2	28-Jun-91 Use of VA plane-legs 1 & 2	\$3,323.08
3	28-Jun-91 Use of VA plane-legs 3 & 5	\$4,647.39
4	28-Jun-91 Use of VA plane-legs 6 & 7	\$1,187.50
5	28-Jun-91 Executive Mans.-Dinner	\$1,525.59
6	02-Aug-91 Executive Mans.-Dinner	\$1,152.07
7	21-Aug-91 Use of VA plane-legs 11-15	\$2,930.77
8	21-Aug-91 dinner expense	\$45.03
9	10-Sep-91 reception	\$877.99
10	25-Sep-91 catering	\$434.59
11	20-Oct-91 breakfast reception	\$113.12
12	05-Dec-91 columnists luncheon	\$182.44
13	05-Dec-91 Use of VA plane-legs 18 19-25 29-31 35-36 37-38	\$9,236.50
14	05-Dec-91 construction for press conference	\$2,307.06
15	02-Jan-92 Use of phones	\$5,000.00
16	08-Jan-92 Use of VA plane-legs 8-10 26-28 32-34 39-45 48-54	\$14,435.72
17	16-Jan-92 Sound system- Presidential announcement	\$350.00
18	15-Jan-92 visa-travel expense	\$4,853.43
19	15-Jan-92 Reimbursement for services by G.Davidson	\$7,795.00
20	23-Jan-92 Use of VA helicopter (state police heli.)	\$6,525.00
21	29-Jan-92 reimbursement for travel	\$351.00
22	07-Feb-92 reception	\$1,456.65
23	07-Feb-92 reimbursement for expenses/telephone	\$77.00
24	28-Feb-92 reimbursement for expenses/Federal Express	\$15.50
25	04-Mar-92 reimbursement for expenses	\$294.50
26	05-Mar-92 reimbursement for expenses	\$49.00
27	11-Mar-92 reimbursement for expenses	\$535.46
28	15-Apr-92 reimbursement for expenses	\$86.25
Total:		\$70,730.02

WILDER FOR PRESIDENT COMMITTEE

SCHEDULE OF ACCOUNTS PAYABLE
NOT CONSIDERED
QUALIFIED CAMPAIGN EXPENSES

VENDOR	DATE PAID	AMOUNT	REASON
1 C & P Telephone	see F5	\$1,470.96	Not Documented F5
2 Robert Ford	see F5	\$434.40	Not Documented F5
3 The Gorman Group	see F5	\$10,000.00	Not Documented F1, F5
4 Linda Hatch	see F5	\$480.00	Not Documented F2, F5
5 Lasser & Assoc.	see F5	\$10,000.00	Not Documented F5, F6
6 William Keough	29-Jan-92	\$5,000.00	Not Documented
7 Ruth Jones	29-Jan-92	\$10,000.00	Not Documented
8 John Brazell	19-Feb-92	\$2,000.00	Not Documented
9 First Consumers	20-Feb-92	\$814.00	Not Documented
10 Ron Lester	15-Apr-92	\$2,392.30	Non-Qualified Campaign Expenses
11 Federal Express	12-May-92	\$456.75	Not Documented F3
12 AT&T	25-Mar-92	\$406.00	Not Documented
13 AT&T	12-May-92	\$83.45	Not Documented
14 C & P Telephone	30-Jan-92	\$592.61	Not Documented F4
15 C & P Telephone	02-Jan-92	\$553.86	Not Documented F4
16 C & P Telephone	04-Feb-92	\$1,134.05	Not Documented F4
17 C & P Telephone	01-Apr-92	\$584.07	Not Documented
18 Trsr of Virginia	15-Jan-92	\$2,531.83	Not Documented F7
Total		\$48,934.28	

FOOTNOTES:

- F1 Job order cancelled.
- F2 Audit staff recognized \$378.50 for travel in 12-91.
- F3 Documentation in vendor file supports only \$786.00; diff. \$456.75.
- F4 Need entire phone billing for documentation.
- F5 No date can be identified; items listed on Committee's accounts payable NOCO schedule, but no disbursement record can be found.
- F6 Documentation supports \$826.48; \$9,173.52 difference is undocumented
- F7 Payment for use of credit card = \$4,853.45; \$2,531.83 represents the undocumented portion

WILDER FOR PRESIDENT COMMITTEE
SCHEDULE OF SEVERANCE PAYMENTS

	(1) PAYEE	(2) DATE	(3) AMOUNT	
1	India Adeos	29-Jan-92	\$1,600.00	F1
2	Scott Bates	30-Jan-92	\$1,500.00	
3	Sarah Callahan	29-Jan-92	\$1,800.00	
4	Eric Easter	29-Jan-92	\$2,000.00	
5	John Hotchkiss	29-Jan-92	\$1,200.00	
6	Nicholas Perrins	30-Jan-92	\$1,200.00	F1
7	Adam Slate	29-Jan-92	\$800.00	F1
8	Antoine Smith	29-Jan-92	\$1,100.00	F1
9	Herman Stevenson	29-Jan-92	\$1,400.00	
10	James Thompson	29-Jan-92	\$1,000.00	
11	Jeremy Wiley	29-Jan-92	\$1,700.00	F1
TOTAL:			<u>\$15,300.00</u>	

FOOTNOTES:

F1 Continued to receive normal salary payments for February, March, and April (1992); subsequent to the January 1992 severance payments.

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WILDER FOR PRESIDENT COMMITTEE
SCHEDULE OF APPARENT NON-QUALIFIED
CAMPAIGN EXPENSES

	VENDOR	DATE PAID	AMOUNT
1	Joe Johnson	15-Jan-92	\$1,513.00
2	C & P Telephone	30-Jan-92	\$592.61
3	C & P Telephone	02-Jan-92	\$553.86
4	C & P Telephone	04-Feb-92	\$1,134.05
5	Trsr of Virginia	15-Jan-92	\$2,531.83
6	John Brazell	19-Feb-92	\$2,000.00
7	First Consumers	20-Feb-92	\$814.00
8	Trsr of Virginia	08-Jan-92	\$2,784.46

Total: \$11,923.81

05070192307

EPSTEIN BECKER & GREEN, P.C.

ATTORNEYS AT LAW

1227 28TH STREET, N.W.

WASHINGTON, D.C. 20037-11887

(202) 661-0900

TELECOPIER: (202) 290-8808

DIRECT LINE

280 PARK AVENUE
NEW YORK, NEW YORK 10177-00777
(212) 381-4500

878 CLINTON PARK EAST
LOS ANGELES, CALIFORNIA 90007-2901
(310) 588-8881

512 LANDMARK SQUARE
STAMFORD, CONNECTICUT 06901-27047
(203) 348-3737

ONE RIVERFRONT PLAZA
NEWARK, NEW JERSEY 07102-8401
(201) 648-1900

101 FEDERAL STREET
BOSTON, MASSACHUSETTS 02110-1000
(617) 348-7088

111 PINE STREET
SAN FRANCISCO, CALIFORNIA 94111-0614
(415) 398-3808

12700 HERT DRIVE
DALLAS, TEXAS 75281-1001
(214) 490-3143

118 SOUTH MONROE STREET
TALLAHASSEE, FLORIDA 32301-1830
(904) 681-0808

2400 SOUTH BONE HIGHWAY, SUITE 100
MIAMI, FLORIDA 33133
(305) 666-1100

510 KING STREET, SUITE 301
ALEXANDRIA, VIRGINIA 22304-3427
(703) 664-1804

December 13, 1993

U.S. NEW YORK WASHINGTON D.C. NEW JERSEY
CONNECTICUT, VIRGINIA AND TEXAS ONLY

VIA TELECOPY

Robert J. Costa
Assistant Staff Director for
the Audit Division
Federal Election Commission
999 E Street, N.W., Room 725
Washington, DC 20463

RE: Wilder for President Committee: Response To Interim Audit Report

Dear Mr. Costa:

This constitutes the response of the Wilder for President Committee ("the Committee") to the Interim Audit Report approved by the Commission on November 9, 1993.

First, the Committee incorporates by reference its responses to its previous Interim Audit Report, which were filed with your office on August 12, 1993.

Second, the Committee submits the attached memorandum in response to the Audit Division's Recommendation #4.

If you have any questions regarding this matter, please do not hesitate to contact me at 202/861-1877.

Very truly yours,



Leslie J. Kerma
General Counsel
Wilder for President Committee

Enclosure

ATTACHMENT 8

Page 1 of 5

RESPONSE TO AUDIT DIVISION'S RECOMMENDATION #4

SUBJECT: Payments For Use Of State Plane

Wilder for President Committee (the "Committee") used the Commonwealth of Virginia's plane on several occasions for campaign-related travel. Pursuant to state policy, the Commonwealth invoiced the Committee for campaign use at the Commonwealth's normal and ordinary rate of \$625.00 per hour of plane use plus pilot and miscellaneous expenses. The Committee reimbursed the Commonwealth for such travel on a timely basis.

Federal election law also addresses the use of government conveyance in connection with federal elections. The Code of Federal Regulations provides at 11 C.F.R. 9034.7 that "If any individual, including a candidate, uses government conveyance or accommodations paid for by a government entity for campaign-related travel, the candidate's authorized committee shall pay the appropriate government entity an amount equal to the first class commercial airfare plus the cost of other services, in the case of travel to a city served by a regularly scheduled; or the commercial charter rate plus the cost of other services, in the case of travel to a city not served by a regularly scheduled commercial service."

As noted above, the Committee used the Commonwealth of Virginia's plane for campaign-related travel on several occasions. As required by the Commonwealth, Wilder for President reimbursed the Commonwealth of Virginia at the rate of \$625.00 per hour of plane use plus pilot and miscellaneous expenses. Due to a conflict between federal and state methods for calculating reimbursements in connection with the use of Commonwealth aircraft, the Audit Division preliminarily concluded that the Committee must pay the Commonwealth of Virginia an additional \$25,847.04 for the use of the state plane. The Committee disputes the Audit Division's position that the Committee pay the Commonwealth of Virginia an additional \$25,847.04. The Audit Division's underlying analysis and calculations are flawed. Therefore, the alleged repayable amount of \$25,847.04 pursuant to federal regulations is erroneous for various reasons.

The Committee disputes the Audit Division's payment amount of \$25,847.04 based upon its use of the General Services Administration first-class airfare. The Audit Division used General Services Administration's first class airfare as the standard first class airfare to determine the cost per leg. The Regulations do not dictate that first class airfare be based on GSA's determination of first class airfare. The Regulations only require that payment be made to the appropriate government entity in the amount equal to the commercial first class airfare. In fact, there is no standard first class airfare. On any given day, different travel agencies and airlines might provide various first-class commercial airfares. Accordingly, there were most likely other first-class airfares lower than GSA's first class airfare for each particular flight. Therefore, because the first-class airfares that the Audit Division used were not determinative first-class airfares, the alleged repayable amount is highly questionable.

The Interim Audit Report also inaccurately stated that the Committee failed to provide certain flight information to the FEC. The Committee strongly disagrees with this statement. The Committee continually forwarded all records in its possession relating to use of the Commonwealth plane to the Commission. The Committee was unable to provide the Commission with documents which were not in its possession. The Committee never asserted that the Commonwealth did not possess information related to the use of the Commonwealth plane. The Committee stated only that the Committee did not possess such information and, therefore, was unable to forward that information to the FEC.

The Audit Division also requested copies of flight logs for November 20, 1991 and December 4, 1991. Flight logs for November 20, 1991 and December 4, 1991 were included in documents previously provided to the Audit Division. Attached are copies of such flight logs.

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7:00

CONCORDIA OF VIRGINIA - FLIGHT LOG

AIRCRAFT NO 1VA DATE 11-20-91

14

CREW	TOTAL TIME	MIGHT TIME	WV TIME	GOOD TIME	TYPE	LANDINGS	
						APP.	DAY
W. Leusk	14					1	
effies	13					1	

VOR CHECK - 30 DAYS - NEXT DUE 13 Dec.

CHECK	PLACE	VOR 1	VOR 2	SIGNATURE

FLIGHT TIME

TIME	ALTITUDE	QAT	RAS	ENGINES	MP	TORQUE	MP
1740.9							
1758.0							
AT TIME							

AIRCRAFT TIME

AIRCRAFT	LEFT ENGINE	RIGHT ENGINE
STARTS		
CYCLES		
HOURS		
STARTS		
CYCLES		
HOURS		

AIRCRAFT DISTRIBUTION

NO. OF	CO.	ROUTE	CITY/CD	SECTION	NO.	NO. ACTIVE	NO. CHG.

DEPART FROM	ARRIVE AT	TIME	TIME	TIME	TIME	TIME	TIME	CHARGED TO
RK BOS	131	1254	1.4					60V
BOS	RK	2305	1.5					6

CHUICE ALTITUDE	QAT	RAS	ENGINES	MP	TORQUE	MP	FUEL FLOW	FUEL PRESS.	OIL TEMP.	OIL PRESS.	LOAD METER	VOLT METER

CHARGES

FLIGHT TIME	=	2.9	HR.	=	1212.50
WAIT TIME	=		HR.	=	
TOTAL	=	2.9	HR.	=	1212.50

AIRCRAFT DISCREPANCIES

DISCREPANCY	ACTION TAKEN

Pilot's Signature _____ Mechanic's Signature _____

95970192112

COMMONWEALTH OF VIRGINIA - FLIGHT LOG

AIRCRAFT NO 2VA

DATE 12/4/91

107

CRN	TOTAL TIME	BKGT TIME	WX TIME	HOOD TIME	TYPE	LANDINGS
WILLIAMS	7.5	2.5	0.5	0.5	1	1
SURDEN	7.0	2.0	0.3	0.3	2	2

FOR CHECK - 30 DAYS - NEXT DUE

1 CHECK	PLACE	FOR 1	FOR 2	SIGNATURE

FLIGHT TIME

TIME	336.3
1 TIME	12328.8
OR TIME	2451

CHOOSE ALTITUDE	DAY	IAS	ENGINE	P3	BAROMETER	MP
21.00	16	192	LEFT	100	180	180
			RIGHT	100	180	180

AIRCRAFT TIME

AIRFRAME HOURS	LEFT ENGINE HOURS	RIGHT ENGINE HOURS

of 12.00 hrs To 1.00 hrs To No Adaptor On 12.00 AT 04L

DEPART TIME	ARRIVE TIME	TIME ON	TOTAL TIME	WAIT TIME	PAK	CHARGE TO
			1.5		5	60.0

FLIGHT TIME	WAVE TIME	PARKING/LANDING FEE	EXTENSIVE	TOTAL
2.5	1.5			242.97

ATTACHMENT

NO.	ROUTE	CITY/CD	REMARKS FOR THIS ACFT/TYPE	REG. CHG.

AIRCRAFT DISCREPANCIES	ACTION BASED
	A-2551
	11712

Pilot's Signature

Mechanic's Signature

EPSTEIN BECKER & GREEN, P.C.

ATTORNEYS AT LAW

227 25th STREET N.W.

WASHINGTON D.C. 20037-1167

202-861-0900

FAX 202-296-2882

DIRECTOR

11 PINE STREET
SAN FRANCISCO CALIFORNIA 94111-3614
415-398-3800

2750 MERIT DRIVE
DALLAS TEXAS 75228-2087
214-480-3143

116 SOUTH MONROE STREET
TALLAHASSEE FLORIDA 32301-9300
904-681-0898

2400 SOUTH DIXIE HIGHWAY SUITE 200
MIAMI FLORIDA 33133
305-556-1100

810 KING STREET SUITE 301
ALEXANDRIA VIRGINIA 22314-3132
703-684-1204

250 PARK AVENUE
NEW YORK NEW YORK 10177-0077
212-351-4500

875 CENTURY PARK EAST
LOS ANGELES CALIFORNIA 90067-2901
310-356-8881

52 LANDMARK SQUARE
STAMFORD CONNECTICUT 06901-3704
203-348-3737

ONE RIVERFRONT PLAZA
NEWARK NEW JERSEY 07102-9401
201-842-9900

75 STATE STREET
BOSTON MASSACHUSETTS 02109
617-342-6000

August 12, 1993

P.C. NEW YORK WASHINGTON DC NEW JERSEY
CONNECTICUT BOSTON AND TEXAS ONLY

HAND-DELIVERED

Robert J. Costa
Assistant Staff Director for
the Audit Division
Federal Election Commission
999 E Street, N.W., Room 725
Washington, DC 20463

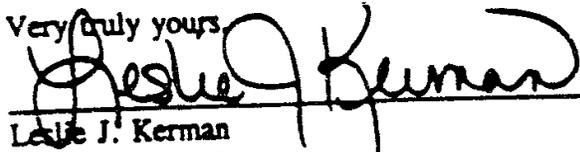
RE: Wilder for President Committee: Response To Interim Audit Report

Dear Mr. Costa:

Enclosed please find the Wilder for President Committee's ("the Committee") response to the Audit Division's Interim Audit Report.

If you have any questions regarding this matter, please do not hesitate to contact me at 202/861-1877.

Very truly yours,



Leslie J. Kerman
General Counsel
Wilder for President Committee

Enclosures

ATTACHMENT 9
Page 1 of 18

05070192113

RESPONSE TO AUDIT DIVISION'S RECOMMENDATIONS #1 and #2

SUBJECT: Apparent Excessive and Prohibited Contributions

The Committee disputes the Audit Division's preliminary findings regarding (i) the projected dollar amount of unresolved prohibited contributions, and (ii) the Audit Division's recommendation that the Committee make payment to the United States Treasury of any excessive or prohibited contributions.

The Committee is still in the process of reviewing the contributions identified by the Audit Division as excessive and prohibited. The Audit Division's preliminary finding identifies unresolved excessive contributions in the amount of \$5,200.00. The Interim Audit notes that the \$5,200.00 "represent[s] the total dollar value of the unresolved excessive contributions." In order to reach this conclusion, the Audit Division obviously reviewed all the contributions received by the Committee. This examination should have enabled the Audit Division to make a preliminary determination regarding the total dollar value of any unresolved prohibited contributions as well. Instead, for some unexplained reason, the Audit Division identified several unresolved prohibited contributions and used a sampling method to project a dollar amount representing unresolved prohibited contributions. After having examined all the contributions, there is no rationale for the Audit Division utilizing a sampling method to project prohibited contributions instead of calculating the total dollar amount. It is the position of the Committee that if the Audit is to contain amounts representing unresolved prohibited contributions, the Audit Division, having already reviewed all the contributions, should be required to present a total dollar amount and not a projected amount.

Assuming arguendo that the Committee did accept excessive and prohibited contributions, the Committee challenges the Commission's authority to require payment of unresolved excessive and prohibited contributions to the United States Treasury. Contributions deemed excessive and prohibited are not subject to the repayment provisions of the Presidential Primary Matching Fund regulations. Pursuant to the regulations, the bases for repayment include (1) payments in excess of candidate's entitlement; (2) use of funds for non-qualified campaign expenses; (3) failure to provide adequate documentation; and (4) surplus. Receipt of excessive and prohibited contributions are not mentioned. In fact, in a letter to the Committee dated June 2, 1992, the Commission apparently recognizes that it is without the legal authority to require campaign committees to make such payments to the United States Treasury, noting that it will "request" that unresolved excessive or prohibited contributions be paid to the United States Treasury.

To the extent that the Committee may have inadvertently accepted excessive or prohibited contributions, the Committee should be permitted to refund such contributions to the respective contributors, with the express understanding that any such refunds will be recognized as "documented, qualified campaign expenses" by the Commission. Moreover, the Committee should be permitted to enter into standard conciliation negotiations with the Commission regarding any possible civil penalties to be paid in connection with such excessive and prohibited contributions. Any such penalties must be commensurate with civil penalties imposed on other

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presidential and non-presidential committees for the same or similar violations.

Accordingly, the Committee requests:

- (1) that the Audit Division's recommendation that the Committee pay to the United States Treasury \$5,200.00, representing the total dollar value of the unresolved excessive contributions be deleted;
- (2) that the Audit Division's recommendation that the Committee pay to the United States Treasury \$3,983.63, representing the projected dollar amount of unresolved prohibited contributions be deleted;
- (3) that any FEC actions involving the Committee's possible acceptance of excessive and/or prohibited contributions be based on actual contributions, not projected amounts;
- (4) that the Commission confirm that any refund(s) issued at this time by the Committee to contributors in connection with apparent excessive and/or prohibited contributions will be classified as "qualified campaign expenses"; and
- (5) that any civil penalty which may be assessed against the Committee in connection with the possible acceptance of excessive and prohibited contributions be commensurate with civil penalties imposed on other federal political committees (both presidential and non-presidential) for similar violations.

RESPONSE TO AUDIT DIVISION'S RECOMMENDATION #3

SUBJECT: Misstatement of Financial Activity

On Thursday, August 12, 1993, the Committee filed with the Federal Election Commission eighteen (18) amended reports. To the best of the Committee's knowledge and ability, these amended reports accurately reflect the Committee's financial activity from inception through June 30, 1993. Moreover, the amended reports result in an FEC cash-on-hand amount as of June 30, 1993 which reconciles with the Committee's actual cash-on-hand as of that date (bank statement balance minus outstanding checks).

Please note that the Committee's amended 1992 Year-End Report (covering 11/24/92-12/31/92) includes: (a) a receipt of a refund of operating expenses from Asahi Newspapers which was inadvertently omitted from its amended report covering 1/1/92-1/31/92; and (b) a one-time reconciling adjustment in the amount of \$678.02 to bring the FEC cash-on-hand in line with the actual cash-on-hand.

The amended reports cover the following time periods:

<u>AMENDED REPORT</u>	<u>PERIOD COVERED</u>
1. April 15th Quarterly Report	03/27/91-03/31/91
2. July 15th Quarterly Report	04/01/91-06/30/91
3. October 15th Quarterly Report	07/01/91-09/30/91
4. January 31st Year-End Report	10/01/91-12/31/91
5. January Monthly Report	01/01/92-01/31/92
6. February Monthly Report	02/01/92-02/28/92
7. March Monthly Report	03/01/92-03/31/92
8. April Monthly Report	04/01/92-04/30/92
9. May Monthly Report	05/01/92-05/31/92
10. June Monthly Report	06/01/92-06/30/92
11. July Monthly Report	07/01/92-07/31/92
12. August Monthly Report	08/01/92-08/31/92
13. September Monthly Report	09/01/92-09/30/92
14. Pre-General Election Report	10/01/92-10/14/92
15. Post-General Election Report	10/15/92-11/23/92
16. January 31st Year-End Report	11/24/92-12/31/92
17. April 15th Quarterly Report	01/01/93-03/31/93
18. July 15th Quarterly Report	04/01/93-06/30/93

Again, the Committee has expended a tremendous amount of time, energy and resources to make these amended reports as accurate and complete as possible.

Accordingly, the Committee specifically requests that the Commission take no further action with respect to this matter.

RESPONSE TO AUDIT DIVISION'S RECOMMENDATION #7

SUBJECT: Use of Corporate Aircraft

The Committee disputes the Audit Division's preliminary findings that (i) the Committee understated the cost of first-class air fare between certain destinations, and (ii) certain individuals travelling on corporate aircraft were involved in campaign-related activities.

Prior to each trip in which Governor Wilder used corporate aircraft, the Committee contacted Covington International Travel, a travel agency located in Richmond, Virginia, to ascertain, pursuant to 11 C.F.R. §114.9(e), the applicable first-class airfare between the destinations. Payment was calculated and made by the Committee to each corporation prior to the trip based on the applicable first-class airfare quoted by the travel agency. Attached hereto is a signed statement by Carol Davidson, National Scheduling Director for the Wilder for President Committee, describing the process employed by the Committee in calculating payments to the corporations for use of their aircraft.

In its calculation of amounts owed to the corporations, the Audit Division quotes first-class airfares it obtained from the General Services Administration.¹ Neither the FEC's regulations nor the FEC Financial Control and Compliance Manual for Presidential Primary Candidates Receiving Public Financing, (January 1992 edition), require, or even suggest, that campaign committees obtain first-class airfares from a particular source such as the General Services Administration. In each of the instances under review by the Audit Division, the Committee used due diligence in obtaining first-class airfares from a reputable travel agency. Since the figures used by the Committee are actual legitimate first-class fares, the Audit Division should apply these fares in determining whether there was any under payment.² Nothing obligates the Committee to use anything but the lowest first-class airfare applicable.

Prior to each trip, the Committee paid the corporation an amount equal to the first-class airfare for all those travelling on campaign-related business. Attached are signed statements from representatives of the three corporations -- Electronic Data Systems Corp. ("EDS"), CSX Corporation, and S.M.I. Corporation -- that provided Governor Wilder with use of their aircraft. Each statement contains a passenger list for each of the flights in question. Based on this documentation, the Audit Division needs to correct Attachment 6 to indicate that:

- On the trip from Richmond, VA to Dallas, TX, only two individuals -- Governor

¹ In our telephone conversation with the General Services Administration Travel Management Office, we were told that the fares published monthly in the Federal travel directory are not necessarily the lowest fares available.

² Neither the Committee nor the agents from Covington International Travel recorded the particular airline(s) reviewed to determine the lowest, first-class airfare -- as this is not required by applicable FEC regulations.

Wilder and Glenn Davidson -- were on campaign-related business. John Lacopo and William R. Sweeney, Jr. are employees of EDS and were on non-campaign related business. The Audit Division correctly noted that there were only two campaign-related travelers on the trip from Dallas to San Antonio.

- On the round trip between Richmond and Newark, NJ, Governor Wilder was the only individual travelling on campaign-related business. Frank Perry is a member of the Governor's executive protection unit and was not on campaign-related business. To the best of the Committee's knowledge, the other passengers were either employees of CSX or guests of the corporation. In either case, they were not travelling on campaign-related business.
- On the round trip between Memphis, TN and Richmond, there were two individuals travelling on campaign-related business, Governor Wilder and Joe Johnson. The other two passengers, Michael LeCroy and Terry Fletcher are members of the Governor's Executive Protection Unit.

Accordingly, the Committee requests that the Audit Division's recommendation that the Committee make a payment to the United States Treasury in the amount of \$6,318.00 be deleted and that the Commission take no further action with respect to this matter.

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RESPONSE TO AUDIT DIVISION'S RECOMMENDATION #8

SUBJECT: Apparent Non-Qualified Campaign Expenses

The Committee disputes the Audit Division's preliminary finding that compensation payments made to 12 individuals¹ on January 29 and 30, 1992 and February 19, 1992, totalling \$17,300.00, are non-qualified campaign expenses (Interim Audit Report, at pages 21-22). These 12 payments to Committee consultants constitute legitimate and reasonable winding-down expenditures by the Committee and thus, are qualified campaign expenses.

BACKGROUND

As the Audit Division is aware, Governor Wilder unexpectedly ended his campaign for the Democratic nomination for President on the evening of January 8, 1992 -- approximately one month before the first presidential caucus and several months prior to many of the southern-state primaries where he was expected to do particularly well. The Governor's announcement came as a total surprise -- particularly to the dozen or so consultants whose major, if not sole, source of income was the Committee. Two of these individuals had worked with the Committee since the spring of 1991; others had just recently quit their jobs to come work with the Committee.

Immediately following the January 8th announcement, the Committee had to decide how to staff -- both for the short-term and the long-term -- its necessary close-down activities and its FEC audit/compliance operations. The short-term activities promised to be particularly time-consuming and delicate -- since prior to January 8th, the Committee was actively expanding, not contracting, its operations and commitments. Among other decisions, the Committee decided to compensate the twelve consultants noted by the Audit Division² at least through February 15, 1992. In consideration therefore, the twelve consultants were to assist the Committee, on an as-needed basis, with close-down activities and with obtaining and compiling information and documentation for the FEC audit.

The precise compensation arrangement for the 1/16/92-2/15/92 period differed by individual, subject to each individual's negotiations with the Committee's management. In general, a consultant's rate of compensation for this time period was comparable to his/her most-recent rate of compensation³. However, certain consultants, such as India Adeas, Sarah

¹This number includes John Brazzell.

²(1)The twelve consultants are: India Adeas; (2) Scott Bates; (3) John Brazzell; (4) Sarah Callahan; (5) Eric Easter; (6) John Hotchkiss; (7) Nicholas Perrins; (8) Adam Slate; (9) Antoine Smith; (10) Herman Stevenson; (11) James Thompson; and (12) Jeremy Wiley.

³The Committee's payments to these same consultants for services rendered prior to 1/16/92 have already been determined to be qualified, campaign expenses by the Audit Division.

Callahan, Nicholas Perrins, Adam Slate, Antoine Smith, Herman Stevenson, and James Thompson negotiated for, and received, somewhat higher fee amounts.

Please note that none of the fees paid by the Committee could possibly be classified as exorbitant or excessive. The Committee was quite frugal, and this frugality included its compensation arrangements with its consultants.

During the last few weeks of January, 1992, the Committee approached certain of the referenced consultants regarding working with the Committee on a regular basis, starting February 1, 1992, in connection with the Committee's close-down and FEC audit/compliance matters. Consequently, Ms. Adeas, Mr. Brazzell (only through 2/28/92), Mr. Perrins, Mr. Slate, Mr. Smith and Mr. Wiley began working again with the Committee on a regular basis.

Please note that in setting each consultant's compensation amount, the Committee took into consideration the fact that the consultant had received a "final" compensation check covering work to be performed on an as needed basis through February 15, 1992.

CONCLUSION

Campaigns are given wide discretion regarding how to wind-down their affairs, including the structure of their close-down and FEC audit/compliance operations. Moreover, during the initial close-down period, all campaigns have a critical need for the information possessed by certain pre-ineligibility campaign workers - without which tasks ranging from identifying ongoing committee financial obligations, to obtaining documentation for the FEC, would be extraordinarily difficult.

Thus, based on the particular circumstances under which it was operating, the Committee's compensation arrangements to secure the assistance of certain individuals, on an as-needed basis, during the 1/16/92-2/15/92 period were entirely appropriate - and clearly satisfy the standards for necessary winding-down expenses set forth by FEC regulations. As such, payments to the referenced twelve consultants constitute qualified, campaign expenses.

Also, for the sake of argument, please note that the Committee is of the position that unrestricted severance payments of approximately one-month's salary to campaign consultants when a campaign terminates in the sudden manner as described herein, are entirely legitimate winding-down expenses, and thus qualified, campaign expenses.

While there are no written documents that set forth the details of these arrangements, post-2/1/92 compensation payments to these individuals previously have been recognized as "qualified campaign expenses" by the Audit Division.

RESPONSE TO AUDIT DIVISION'S RECOMMENDATION #8
(1st Response of 4)

SUBJECT: Undocumented Disbursements

In Attachment 9 to the Interim Audit Report, the Audit Division classifies an alleged disbursement by the Committee of \$500 to Grassroots Systems (check dated January 30, 1992) as an apparent non-qualified campaign expense due to lack of documentation.

Please note that no such check was issued to Grassroots Systems, and the Committee's February 20, 1992 Report (covering 1/1/92 - 1/31/92) has been amended, to omit this disbursement. Apparently on January 30, 1992, a Committee representative erroneously prepared a \$500 check to Grassroots System. However, prior to the check being issued to the vendor, the Committee reviewed the matter, and determined that there was no documentation in connection with this alleged debt, and further, that it had no outstanding balance to Grassroots System. Accordingly, the check was torn up.

Thus, this \$500 check should be deleted from the Audit Division's schedule of apparent non-qualified campaign expenses.

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RESPONSE TO AUDIT DIVISION'S RECOMMENDATION #8
(2nd Response of 4)

SUBJECT: Undocumented Disbursements

In Attachment 9 to the Interim Audit Report, the Audit Division characterizes the Committee's payment of \$2,500 to the Jefferson Hotel (check dated January 17, 1992) and its payment of 1,000 to Marshall Keys (check dated January 17, 1992) as apparent non-qualified campaign expenses.

The Committee disputes this finding. Both these disbursements were in connection with a Committee event of January 17, 1992 at the Jefferson Hotel that was scheduled and organized prior to Governor Wilder's unexpected termination of his candidacy on the evening of January 8, 1992 (a draft version of the invitation to the January 17, 1992 event, along with the Committee's final changes thereto, is attached.) Thus, the Governor's termination announcement came only nine days before the January 17th event, and after a large number of individuals had been invited, and in many instances purchased a ticket(s), to the event.

Under the circumstances, the Committee decided, on or about January 9, 1992, that the most reasonable thing to do was to go forward with the event it had already committed to hold -- but to halt the solicitation of further contributions with respect to the event, and to recharacterize the previously-scheduled fundraiser as also a thank you party for those who worked and volunteered on the campaign.

It should be noted that, in previous audits of presidential campaigns, the Audit Division has expressly classified post-ineligibility thank you parties for campaign staff and volunteers as legitimate winding down expenses and thus qualified campaign expenses. (See Audit of 1988 Paul Simon for President Committee, disbursements in connection with December 9, 1988 holiday thank you parties for campaign staff and volunteers -- in particular, disbursement(s) to the Sheraton Washington Hotel in Washington, D.C.) And, unlike prior, FEC-approved QCE events, the Committee's January 17th event was organized, arranged and committed to, prior to the candidate's date of ineligibility.

The Committee's January 17th event was a pre-ineligibility commitment, as well as a legitimate winding down expense. As such, the Committee's payment of \$2,500 to the Jefferson Hotel (check dated January 17, 1992) and its payment of the \$341.73 balance due to the hotel (by check dated February 11, 1993), as well as the \$1,000 paid by the Committee to Marshall Keys (check dated January 17, 1992) as compensation for his band playing at the event, clearly are qualified campaign expenses -- and should be reclassified as such by the Audit Division. (Documentation in connection with all these disbursements also are attached.)

RESPONSE TO AUDIT DIVISION'S RECOMMENDATION #8
(3rd Response of 4)

SUBJECT: Apparent Non-Qualified Campaign Expenses

Attached please find copies of signed statements from Ruth M. Jones (2 statements) and William Keough describing the services each performed for the Committee, and the compensation and expense reimbursements each received from the Committee in connection therewith. The attached statements clearly support the \$16,300 in consulting fees paid by the Committee to Ms. Jones and the \$5,000 in fees paid to Mr. Keough.

In addition, Ms. Jones' statement constitutes documentation for the three expense reimbursement checks, totalling \$668.44, which she received from the Committee. While Ms. Jones unfortunately cannot locate the actual receipts for the items she purchased for the Committee, her signed, detail description of such items - which obviously were purchased in connection with her ongoing consulting activities for the Committee - satisfy the requirements of 11 C.F.R §9033.11(b), as well as the tests established by the Commission's prior decisions in previous presidential audits regarding documentation for expenses.

Accordingly, the Committee requests that all of the referenced disbursements be reclassified as documented, qualified campaign expenses.

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RESPONSE TO AUDIT DIVISION'S RECOMMENDATION #8
(4th Response of 4)

SUBJECT: Apparent Non-Qualified Campaign Expenses

As detailed in Attachments 7 and/or 9 of the Interim Audit Report, the Audit Division characterizes the Committee's payment of various disbursements as apparent non-qualified campaign expenses. With respect to eight of those disbursements, attached please find check copies and documentation for disbursements totalling \$6,396.77.

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RESPONSE TO AUDIT DIVISION'S RECOMMENDATION #9

SUBJECT: Matching Funds Received In Excess Of Entitlement

The Committee disputes the Audit Division's preliminary calculation that the Committee received matching funds in excess of entitlement.

Information and documentation provided to the Audit Division throughout this filing serve to reduce the \$59,905.02 preliminary figure.

In addition, the following attachments include documents and information which demonstrate that the Committee did not receive matching funds in excess of entitlement.

1. Attached list of \$50,757.52 in disbursements made by the Committee from July 1, 1992 through August 12, 1993, as well as check copies and documentation to support each check.
2. Attached copies of outstanding invoices owed by the Committee as of August 12, 1993: a \$375.00 invoice from Nicholas Perrins and a \$5,282.20 invoice from Elliott & Zweben, P.C. These invoices, totalling \$5,657.20, will be paid by the Committee by the end of August, 1993.

Additionally, the following is an estimate of Committee's legal, accounting and administrative winding-down expenses from August 13, 1993 through August 12, 1994 (one-year estimated to conclusion of audit and actual termination of Committee):

A.	Legal Fees & Disbursements		
	\$1,000 per month on average multiplied by 12 months	=	\$12,000.00
B.	Fees to Nicholas Perrins		
	\$100 per month on average multiplied by 12 months	=	\$ 1,200.00
C.	Administrative Costs (Such as reimbursement to Commonwealth of Virginia for Federal Express Charges)		
	\$30 per month on average multiplied by 12 months	=	\$ 360.00
			<hr/>
	TOTAL:	=	\$13,560.00

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RESPONSE TO AUDIT DIVISION'S RECOMMENDATION #9

SUBJECT: NOCO Statement -- Capital Assets

The Audit Division lists an amount of \$15,451.76 on its revised NOCO Statement for the Committee (Interim Audit Report, at page 18).

The Committee disputes this amount, particularly since the fair-market value today of its remaining capital assets is probably in the \$2,000 range.

Moreover, the Committee specifically disputes the inclusion by the Audit Division of 3 lease payments to Fairfax Computer Products, totalling \$8,512.96, in its calculation of the Committee's capital assets.

Accordingly, the Committee requests an explanation and justification for the Audit Division's \$15,451.76 capital assets figure.

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MEMORANDUM

TO: Leslie J. Kerman
FROM: William Keough
DATE: August 11, 1993
RE: Wilder for President Committee

Per your request, the following outlines the services I performed for the Wilder for President Committee ("the Committee") and my compensation from the Committee in connection with these services.

1. I have performed various services for the Committee from approximately April 1, 1991 through the present, including reviewing vendor invoices, the preparation of checks for Ruth Jones' review and signature, maintaining certain financial records of the Committee and assisting with the preparation of FEC reports. Moreover, I have worked with the Committee on various other activities, including travelling with Governor Wilder to New Hampshire in December, 1991 (I took personal leave from my State job for this trip), and preparing filings to qualify for inclusion on State ballots.

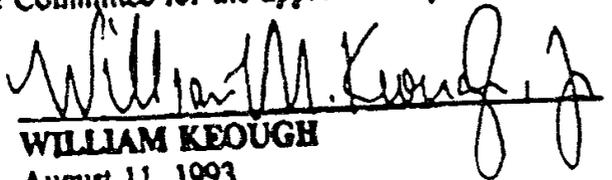
Subsequent to Governor Wilder's termination of his candidacy in January, 1992, I have spent numerous hours working on winding-down the campaign, including assisting in obtaining information and documentation in connection with the FEC audit.

2. I agreed to accept \$5,000 from the Committee as compensation for services I performed through the end of January, 1992. Accordingly, I received a check for \$5,000 from the Committee on or about January 29, 1992. I have not charged the Committee any fees for the many hours spent by me on campaign-related matters from February 1, 1992 through the present (approximately 18½ months), nor have I been compensated for such services by the Committee.

3. I did not receive any severance payment(s) from the Committee. The consulting fees I received were based on actual work I performed for the Committee.

4. To the extent my services to the Committee have exceeded the fees I was paid by the Committee, I hereby convert the remainder of my services to volunteer services on behalf of the Committee (in particular, the close-down related services I have performed for the Committee for the approximately 18½ month period since February 1, 1992).

By:


WILLIAM KEOUGH

Dated:

August 11, 1993

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MEMORANDUM

TO: Leslie J. Kerman
FROM: Ruth M. Jones
DATE: August 11, 1993
RE: Wilder for President Committee

This is to confirm the services I performed, and continue to perform, for the Wilder for President Committee ("the Committee"), and to detail the amounts I charged the Committee for my services.

9 5 0 7 0 1 9 2 2
1. I have served as a consultant to the Committee from approximately April 1, 1991 through the present, with significant responsibilities regarding managing the Committee's funds, paying the Committee's bills, FEC compliance matters, and the Committee's day-to-day financial affairs (for example, from October, 1991 through the present, I have managed the payment of, and signed over 450 Committee checks to multiple campaign vendors and consultants). Moreover, I worked with the Committee on a host of other projects ranging from fundraising activities to political events.

Subsequent to Governor Wilder's termination of his candidacy in January, 1992, I have spent countless hours working on closing-down the campaign, including concluding the Committee's outstanding financial matters and obtaining documentation and information in connection with the FEC audit.

2. I charged the Committee \$16,300 for my services covering the period from approximately April 1, 1991 through May 31, 1992 (an approximately 14-month period). I have not billed the Committee for the numerous hours I have spent working on close-down matters from June 1, 1992 through the present (approximately 14½ months).

3. To date, I have received a total of \$16,300 from the Committee in consulting fees for the above-described services: (a) \$500 by check dated December 6, 1991; (b) \$600 by check dated December 24, 1991; (c) \$600 by check dated January 13, 1992; (d) \$600 by check dated January 21, 1992; (e) \$10,000 by check dated January 29, 1992; and (f) \$4,000 by check dated May 28, 1992. In addition, I have received three expense reimbursement checks from the Committee.

4. I did not receive any severance payment(s) from the Committee. The consulting fees I received were based on actual work I performed for the Committee.

MEMORANDUM

Leslie J. Kerman

FROM: Ruth M. Jones
DATE: August 11, 1993
RE: Wilder for President Committee

This is to confirm the services I performed, and continue to perform, for the Wilder for President Committee ("the Committee"), and to detail the amounts I charged the Committee for my services.

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1. I have served as a consultant to the Committee from approximately April 1, 1991 through the present, with significant responsibilities regarding managing the Committee's funds, paying the Committee's bills, FEC compliance matters, and the Committee's day-to-day financial affairs (for example, from October, 1991 through the present, I have managed the payment of, and signed over 450 Committee checks to multiple campaign vendors and consultants). Moreover, I worked with the Committee on a host of other projects ranging from fundraising activities to political events.

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Subsequent to Governor Wilder's termination of his candidacy in January, 1992, I have spent countless hours working on closing-down the campaign, including concluding the Committee's outstanding financial matters and obtaining documentation and information in connection with the FEC audit.

2. I charged the Committee \$16,300 for my services covering the period from approximately April 1, 1991 through May 31, 1992 (an approximately 14-month period). I have not billed the Committee for the numerous hours I have spent working on close-down matters from June 1, 1992 through the present (approximately 14½ months).

3. To date, I have received a total of \$16,300 from the Committee in consulting fees for the above-described services: (a) \$500 by check dated December 6, 1991; (b) \$600 by check dated December 24, 1991; (c) \$600 by check dated January 13, 1992; (d) \$600 by check dated January 21, 1992; (e) \$10,000 by check dated January 29, 1992; and (f) \$4,000 by check dated May 28, 1992. In addition, I have received three expense reimbursement checks from the Committee.

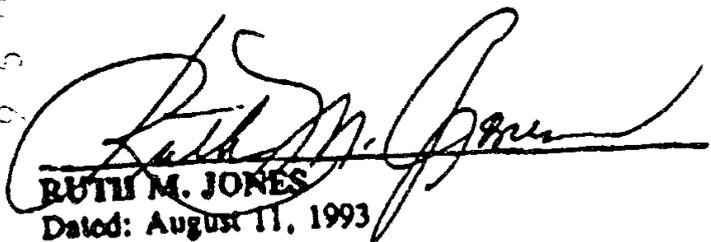
4. I did not receive any severance payment(s) from the Committee. The consulting fees I received were based on actual work I performed for the Committee.

AFFIDAVIT OF RUTH M. JONES

This affidavit is to acknowledge my receipt of reimbursements from the Wilder for President Committee for expenses I incurred on behalf of the Committee in connection with campaign-related activities.

1. On September 26, 1991, the Committee made a payment to me of \$100.00 as reimbursement for approximately 300 U.S. \$0.29 stamps which I purchased from the U.S. Post Office in Richmond, Virginia, through September 26, 1991 for the Committee. In addition, the \$100.00 was to reimburse me for my miscellaneous travel expenses (such as mileage for use of my personal vehicle) in connection with my campaign-related travel through September 26, 1991.
2. On January 2, 1992, the Committee made a payment to me of \$500.00 as reimbursement for expenses I incurred from approximately September 27, 1991 through January 1, 1992. Those expenses were the purchase of approximately 200 U.S. \$0.29 stamps which I purchased from the U.S. Post Office in Richmond, Virginia, for the Committee. In addition, the \$500.00 served to reimburse me for the approximately \$200.00 in office supplies (including stationery and envelopes) which I purchased for the Committee. Further, the \$500.00 was to reimburse me for miscellaneous travel expenses (such as mileage for use of my personal vehicle) in connection with my campaign-related travel through January 1, 1992.
3. On April 22, 1992, the Committee made a payment to me of \$68.44 as reimbursement for 236 U.S. \$0.29 stamps which I purchased from the U.S. Post Office in Richmond, Virginia, for the Committee.

To the best of my knowledge and recollection, all aspects of this affidavit are true and accurate.


RUTH M. JONES

Dated: August 11, 1993



INTERIM REPORT OF THE AUDIT DIVISION
ON THE
WILDER FOR PRESIDENT COMMITTEE

I. Background

A. Audit Authority

This report is based on the audit of the Wilder for President Committee (the Committee). The audit is mandated by Section 9038(a) of Title 26 of the United States Code. That section states that "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." Also Section 9039(b) of the United States Code and Section 9038.1(a)(2) of the Commission's Regulations state that the Commission may conduct other examinations and audits from time to time as it deems necessary.

In addition to examining the receipt and use of Federal funds, the audit seeks to determine if the campaign has materially complied with the limitations, prohibitions and disclosure requirements of the Federal Election Campaign Act of 1971, as amended.

B. Audit Coverage

The audit covered the period from the Committee's inception, January 1991, through April 30, 1992. During this period, the Committee reported an opening cash balance of \$ -0-, total receipts of \$802,057.97, total disbursements of \$646,931.11 and a closing cash balance on April 30, 1992 of \$155,126.86. In addition, a limited review of the Committee's transactions was conducted through June 30, 1992, for purposes of determining the Committee's remaining matching fund entitlement based on its financial position.

C. Campaign Organization

The Committee registered with the Federal Election Commission on March 27, 1991 as Wilder for President Exploratory

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Committee. An amended Statement of Organization was filed on September 27, 1991 changing the name to the Wilder for President Committee. The Treasurer of the Committee during the period covered by the audit was Mark R. Warner. The current Treasurer is Mark R. Warner.

During the period audited, the campaign established an office in New Hampshire in addition to its national headquarters located in Fairfax, VA (initially located in Alexandria, Virginia). The Committee's current offices are located in Washington, D.C.

To handle its financial activity, the campaign used one bank account. The Committee made approximately 546 disbursements. Approximately 2,741 contributions were received from 2,669 persons. These contributions totaled approximately \$532,000.

In addition to contributions, the campaign received \$289,026.67 in matching funds from the United States Treasury. This represents approximately 2% of the \$13,810,000 maximum entitlement that any candidate could receive. The candidate was determined eligible to receive matching funds on November 27, 1991. To date, the campaign has made a total of two matching fund requests totaling \$297,252. The Commission has certified 97.2% of the requested amount. For matching fund purposes, the Commission determined that Governor Wilder's candidacy ended January 8, 1992. This determination was based on a public statement made by the candidate. The campaign received one matching fund payment after January 8, 1992, based on the financial condition presented in the Committee's Statement of Net Outstanding Campaign Obligations (see Finding III.A.).

Attachment 1 to this report is a copy of the Commission's most recent Report on Financial Activity for this campaign. The amounts shown are as reported to the Commission by the campaign.

D. Audit Scope and Procedures

In addition to a review of the qualified and non-qualified campaign expenses incurred by the campaign, the audit covered the following general categories:

1. The receipt of contributions or loans in excess of the statutory limitations (see Finding II.A.);
2. The receipt of contributions from prohibited sources, such as those from corporations or labor organizations (see Finding II.B.);
3. Proper disclosure of contributions from individuals, political committees and other entities, to include the itemization of contributions when required, as well as; the

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completeness and accuracy of the information disclosed;

4. Proper disclosure of disbursements including the itemization of disbursements when required, as well as, the completeness and accuracy of the information disclosed;
5. Proper disclosure of campaign debts and obligations;
6. The accuracy of total reported receipts, disbursements and cash balances as compared to campaign bank records (see Finding II.C.);
7. Adequate recordkeeping for campaign transactions (see Finding II.D.);
8. Accuracy of the Statement of Net Outstanding Campaign Obligations filed by the campaign to disclose its financial condition and establish continuing matching fund entitlements (see Findings III.A. and D.);
9. The campaign's compliance with spending limitations; and
10. Other audit procedures that were deemed necessary in the situation.

In addition, on April 21, 1992, the Audit staff conducted an inventory of the Committee's records to determine if they were materially complete and in auditable condition. A letter dated May 5, 1992, notified the Committee that records pertaining to several areas of the pending audit were not made available for review. Furthermore, the letter informed the Committee that if at the conclusion of a 30 day period ending June 8, 1992, the items listed on the letter had not been provided, the Commission would issue subpoenas for the production of those records. Records provided in response to our May 5, 1992 request were deemed sufficient to commence fieldwork.

At the entrance conference on June 12, 1992, the Audit staff informed the Committee that a request would be made to the Office of General Counsel for subpoenas to be issued to the Treasurer of Virginia, for the production of detailed invoices related to all payments made to the Treasurer of Virginia (see Attachment 5) by the Committee and records relating to all amounts still owed to the Treasurer of Virginia; and to its direct mail

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vendor for the production of all mail code definitions associated with direct mailings.1/

The subpoena to the Treasurer of Virginia, Eddie N. Moore, Jr., was approved by the Commission on July 7, 1992, and delivered on July 10, 1992. In Mr. Moore's response, dated July 29, 1992, he stated that he did not have in his possession any of the subpoenaed documents.

On the 21st and 24th of July 1992, the Audit staff delivered written requests to the Committee for two missing contributor checks and detailed documentation supporting a \$1,000 credit card transaction at the Jefferson Hotel. The Committee was afforded 10 working days to respond. Despite positive assurances, no documentation was provided for review and the subpoena process was initiated by the Audit staff on August 11, 1992.

In a memorandum dated August 24, 1992, the Office of General Counsel recommended that the subpoena previously issued to the Treasurer of Virginia be redirected to the Commonwealth of Virginia and Governor Wilder as its agent. The redirected subpoena would contain a more detailed request for documentation which should aid the Commonwealth in locating the documents.

In addition, the August 24th memorandum requested approval of two additional subpoenas; the first to Nations Bank to produce the two contributor checks deposited by the Committee^{2/}, and the second to the Jefferson Hotel for the production of the credit card documentation mentioned above.^{3/}

The Commission approved the subpoenas on August 28, 1992.

The following is a chronology of events that occurred subsequent to the Commission's action of August 28, 1992.

November 19 and 20, 1992 - the Audit Division received documentation, submitted by the Committee through the Office of General Counsel, relevant to reimbursements for use of the Governor's office telephones and a state employee's salary.

1/ The mail code definitions were provided by the Committee on June 18, 1992, and the subpoena was not issued to the direct mail vendor.

2/ The contributor checks were provided by the Committee on August 25, 1992, and the subpoena to Nations Bank was not issued.

3/ A response from the Jefferson Hotel was received by the Commission on October 1, 1992.

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November 24, 1992 - the Audit Division notified the Counsel's office that salary documentation was sufficient, however, the documentation for the telephone payment was incomplete.

December 15, 1992 - the Commission approved the filing of a civil suit for subpoena enforcement. Prior to such filing, the Commission granted the Committee 10 days to produce the requested documentation.

December 21, 1992 - the Committee made available additional documentation which supplemented its previous submission with respect to use of phones, as well as documentation which supported certain credit card charges.

January 8, 1993 - the Committee made available, for the first time, official flight logs for use of the State of Virginia airplane (previously alleged to be non-existent).

Unless specifically discussed below, no material non-compliance was detected. It should be noted that the Commission may pursue further any of the matters discussed in this report.

II. Findings and Recommendations - Non-repayment Matters

A. Apparent Excessive Contributions

Section 441a(a)(1)(A) of Title 2 of the United States Code states that no person shall make contributions to any candidate and his authorized political committees with respect to any election for Federal office which, in the aggregate, exceed \$1,000.

Section 103.3(b)(3) of Title 11 of the Code of Federal Regulations states, in part, that contributions which on their face exceed the contribution limitations set forth in 11 CFR §110.1 and contributions which do not appear to be excessive on their face, but which exceed the contribution limit set forth in 11 CFR 110.1 when aggregated with other contributions from the same contributor may be either deposited into a campaign depository under 11 CFR 103.3(a) or returned to the contributor. If any such contribution is deposited, the treasurer may request reattribution of the contribution by the contributor in accordance with 11 CFR 110.1(k). If reattribution is not obtained, the treasurer shall, within sixty days of the treasurer's receipt of the contribution, refund the contribution to the contributor.

Section 110.1(k)(3) of Title 11 of the Code of Federal Regulations states, in part, that if a contribution to a candidate or political committee, either on its face or when aggregated with other contributions from the same contributor, exceeds the limitation on contributions set forth in 11 CFR 110.1(b), the treasurer of the recipient political committee may ask the

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contributor whether the contribution was intended to be a joint contribution by more than one person.

A contribution shall be considered to be reattributed to another contributor if within sixty days from the date of the treasurer's receipt of the contribution, the contributors provide the treasurer with a written reattribution of the contribution, which is signed by each contributor, and which indicates the amount to be attributed to each contributor if equal attribution is not intended.

Finally, Sections 110.1(1)(3) and (5) of Title 11 of the Code of Federal Regulations state, in part, that if a political committee receives a written reattribution of a contribution to a different contributor, the treasurer shall retain the written reattribution signed by each contributor as required by 11 CFR 110.1(k). If a political committee does not retain the written records concerning reattribution, the reattribution shall not be effective and the original attribution shall control.

The Commission notified the Committee by letter dated June 2, 1992, that a sampling technique would be used to identify the dollar amount of excessive contributions received by the Committee. The letter states, in part, Commission regulations provide 60 days in which to seek reattribution, redesignation or refund of excessive contributions (see 11 CFR 103.3(b)(1) and (2)). The Commission will no longer recognize any untimely refunds, redesignations or reattributions made more than 60 days following a candidate's date of ineligibility or after the date of receipt of this letter, whichever is later. Excessive contributions resolved by the committees outside these time periods will not be considered mitigated violations. The Committee received the letter June 8, 1992.

The Audit staff's review of contributions received from individuals identified \$5,200 in excessive contributions involving five contributors (see Attachment 2). As of August 11, 1992 (date of exit conference), the Audit staff determined that no refunds or reattributions were made regarding these excessive contributions.

The Committee did not establish a separate account for handling possible excessive contributions; however, the amount of cash maintained on a monthly basis by the Committee in its bank account was greater than the cumulative total of the excessive contributions deposited (see 11 CFR \$103.3(b)(4)).

At the exit conference the Audit staff presented the Committee with a schedule of the apparent excessive contributions. The Committee official acknowledged the receipt of the schedule and stated that Committee personnel would review the apparent errors and attempt to resolve the situation as deemed necessary.

Recommendation #1

The Audit staff recommends that within 30 calendar days of service of this report, the Committee either:

- demonstrate that the contributions discussed above are not excessive; or
- make a payment to the United States Treasury in the amount of \$5,200, representing the total dollar value of the unresolved excessive contributions.

B. Apparent Prohibited Contributions

Section 441b(a) of Title 2 of the United States Code states, in part, that it is unlawful for any national bank or any corporation organized by authority of any law of Congress to make a contribution or expenditure in connection with any election to any political office or for any corporation whatever, or labor organization, to make a contribution or expenditure in connection with any election to federal office and that it is unlawful for any candidate, political committee or any other person to knowingly accept or receive any contribution prohibited by this section.

The Commission notified the Committee by letter dated June 2, 1992, that a sampling technique would be used to identify the dollar amount of prohibited contributions received by the Committee. The letter states, in part, Commission regulations provide 30 days in which to refund contributions which appear to be prohibited (see 11 CFR 103.3(b)(1) and (2)). The Commission will no longer recognize any untimely refunds made more than 60 days following a candidate's date of ineligibility or after the date of the receipt of this letter, whichever is later. Prohibited contributions resolved by the committees outside these time periods will not be considered mitigated violations. The Committee received the letter June 8, 1992.

The Audit staff reviewed contributions received from individuals on a sample basis. Our review identified three apparent prohibited contributions, involving three contributors, totaling \$1,500 (see Attachment 3). These identified exceptions, when used to estimate the total dollar value of prohibited contributions received by the Committee, result in a projection of \$3,983.63. As of August 11, 1992 (date of exit conference), the Audit staff determined that no refunds were made regarding these prohibited contributions.

The Committee did not establish a separate account for handling possible prohibited contributions; however, the amount of ending cash on hand reported by the Committee on its monthly disclosure reports was greater than the cumulative total of the prohibited contributions deposited (see 11 CFR 103.3(b)(4)).

At the exit conference the Audit staff presented the Committee with a schedule of apparent prohibited contributions. The Committee acknowledged receipt of the schedule and stated that personnel would review the apparent errors and attempt to resolve the situation as deemed necessary.

Recommendation #2

The Audit staff recommends that within 30 calendar days of service of this report, the Committee either:

- demonstrate that the contributions discussed above are not prohibited; or
- make a payment to the United States Treasury in the amount of \$3,983.63, representing the projected dollar amount of the unresolved prohibited contributions.

C. Misstatement of Financial Activity

Sections 434(b)(1), (2) and (4) of Title 2 of the United States Code state, in relevant part, that each report shall disclose the amount of cash on hand at the beginning of the reporting period and the total amount of all receipts and disbursements during the reporting period and the calendar year.

The Audit staff's reconciliation of the Committee's reported activity to its bank activity for the period January 1, 1991 through April 30, 1992, revealed the following misstatements:

1. Receipts

The Committee's reported receipts of \$802,057.97 were understated by a net amount of \$19,556.90.

The understatement of receipts was the net result of unreported receipts totaling \$23,106; understated unitemized receipts of \$325.90; contributor checks returned for "non sufficient funds" totaling \$2,850 for which no adjustment was made to reported receipts; overstated receipts from individuals totaling \$775; and an unexplained reconciling item of \$250.

2. Disbursements

The Committee reported disbursements of \$646,931.11 were understated by a net amount of \$5,157.09.

The understatement of disbursements was a net result of unreported disbursements totaling \$4,543.08 and miscellaneous reporting errors totaling \$614.01.

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3. Ending Balance

The Committee's reported ending cash balance at April 30, 1992 of \$155,126.86 was understated by \$14,399.81, a net result of the receipt and disbursements misstatements noted above. The correct ending cash balance at April 30, 1992 was \$169,526.67.

At the exit conference the Audit staff presented the Committee with schedules that detailed the components of the receipts and disbursements misstatements. The Committee stated that amended reports were in the process of being prepared and that a response to the misstatements will be submitted in a timely manner.^{4/}

Recommendation #3

The Audit staff recommends that within 30 calendar days of service of this report the Committee file amended reports to correct the misstatements discussed above.

D. Transactions Involving Commonwealth of Virginia

Introduction

During calendar years 1991 and 1992, the Committee was invoiced by the Office of the Governor, Commonwealth of Virginia (the Commonwealth) for goods/services provided, including the use of (1) an airplane and a helicopter^{5/}, (2) telephones, (3) credit card, and (4) labor and equipment/facilities. The Commonwealth billed approximately \$70,730 and received payment.

1. Use of the Airplane and Helicopter

Section 9034.7(a) of Title 11 of the Code of Federal Regulations states that notwithstanding the provisions of 11 CFR part 106, expenditures for travel relating to the campaign of a candidate seeking nomination for election to the office of President by any individual, including a candidate, shall, pursuant to the provisions of 11 CFR 9034.7(b), be qualified campaign expenses and be reported by the candidate's authorized committee(s) as expenditures.

Section 9034.7(b)(1) through (5) of Title 11 of the Code of Federal Regulations states for a trip which is entirely campaign-related, the total cost of the trip shall be a qualified campaign expense and a reportable expenditure.

^{4/} The Committee submitted an amendment to its July monthly report which corrected a portion of the misstatement noted for disbursements.

^{5/} The use of the helicopter was provided by the Virginia Department of State Police.

For a trip which includes campaign-related and non-campaign related stops, that portion of the cost of the trip allocable to campaign activity shall be a qualified campaign expense and a reportable expenditure. Such portion shall be determined by calculating what the trip would have cost from the point of origin of the trip to the first campaign-related stop and from that stop through each subsequent campaign-related stop, back to the point of origin. If any campaign activity, other than incidental contacts, is conducted at a stop, that stop shall be considered campaign related.

For each trip, an itinerary shall be prepared and such itinerary shall be made available for Commission inspection.

For trips by government conveyance or by charter, a list of all passengers on such trip, along with a designation of which passengers are and which are not campaign-related, shall be made available for Commission inspection.

If any individual, including a candidate, uses government conveyance or accommodations paid for by a government entity for campaign-related travel, the candidate's authorized committee shall pay the appropriate government entity an amount equal to the first class commercial air fare plus the cost of other services, in the case of travel to a city served by a regularly scheduled commercial service; or the commercial charter rate plus the cost of other services, in the case of travel to a city not served by a regularly scheduled commercial service.

Also, 11 C.F.R. §§100.7(a)(1)(iii)(A) and (B) define the term "anything of value" (referring to contribution) to include all in-kind contributions. Unless specifically exempted under 11 CFR 100.7(b), the provision of any goods or services without charge or at a charge which is less than the usual and normal charge for such goods or services is a contribution. Examples of such goods or services include, but are not limited to: securities, facilities, equipment, supplies, personnel, advertising services, membership lists, and mailing lists. If goods or services are provided at less than the usual and normal charge, the amount of the in-kind contribution is the difference between the usual and normal charge for the goods or services at the time of the contribution and the amount charged the political committee. For purposes of 11 CFR 100.7(a)(1)(iii)(A), "usual and normal charge" for goods means the price of those goods in the market from which they ordinarily would have been purchased at the time of the contribution; and usual and normal charge for any services, other than those provided by an unpaid volunteer, means the hourly or piecework charge for the services at a commercially reasonable rate prevailing at the time the services were rendered.

The candidate, frequently accompanied by staff and media personnel, made campaign trips on the Commonwealth's airplane, a Cessna Model S550. The Committee was billed at a rate

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of \$625 per flight hour plus pilots' expenses, landing fees, etc. Virtually all flight destinations were cities served by regularly scheduled commercial service. Thus, in accordance with 11 C.F.R. §9034.7(b)(5), the Committee was required to reimburse the Commonwealth the first class commercial airfare plus the cost of other services.

As discussed at Section I.D., written requests and subpoenas were issued in an effort to obtain all records related to usage of the airplane and the helicopter. All records requested had not been received as of October 28, 1992.

The Committee did however provide (1) invoices which were annotated to include the identification of the passengers who apparently were on the airplane (in at least one instance, one passenger was not listed for a trip), (2) a typed flight itinerary (at least one campaign-related flight was not included and at least one stop on an apparent mixed trip was not included), (3) photocopies of billings issued by the Committee to the media, and (4) photocopies of reimbursement checks received. Records related to the computation of the amounts billed by the Commonwealth, the formal passenger manifest, and a complete accounting of all campaign related trips (in whole or in part) had not been provided by the Commonwealth.

As previously stated, on December 15, 1992, the Commission authorized the Office of General Counsel to file a civil suit against the Commonwealth for subpoena enforcement. Prior to filing, the Commonwealth was granted ten days to comply with the subpoena. The Audit staff received, from the Office of General Counsel, the Commonwealth's response on January 8, 1993. Included in the response were copies of flight log information for use of the Commonwealth's plane, despite repeated allegations that the documents responsive to the subpoena had been previously forwarded to the Audit staff as part of the presidential audit process and/or did not exist.

The Audit staff analyzed the information in hand in an effort to determine if the \$625 per hour charge equated to first class airfare. Based on our analysis of 54 trip legs (17 complete trips), the Commonwealth "underbilled" the Committee by approximately \$25,847.04 (see Attachment 4). Further, the Audit staff identified two campaign related trips (November 20, 1991 and December 4, 1991) for which no flight logs were made available for review.

Recommendation #4

The Audit staff recommends that within 30 calendar days of service of this report, the Committee:

- provide flight log information generated by the Commonwealth for campaign-related trips on the two dates noted above;

- demonstrate that the Commonwealth did not underbill the Committee in the amount of \$25,847.04; or
- make a payment to the Commonwealth in the amount of \$25,847.04.

Further recommendations will be forthcoming.

2. Telephone and Credit Card Usage

The Committee paid the Treasurer of Virginia \$5,000 for use of the Governor's office phone lines, and \$4,853.43 for reimbursement of travel expenses charged on a credit card. The only information provided related to the phone reimbursement was an invoice from the Office of the Governor, dated December 31, 1991, with the following description "Use of Governor's Office phone lines by Wilder for President campaign." No photocopies of phone bills or other documents were made available to show when the calls were made, the charges for the calls and the itemization of campaign vs. non campaign-related calls.

A Committee representative stated that the Governor did not wish to make available the telephone numbers called.

On November 20, 1992, the Audit Division received, from the Office of General Counsel, the Committee's supplemental response to the subpoenas. The response included a typed worksheet that recaps categories of cost (i.e., Monthly Recurring Charges, Scats, Toll Calls, Other Charges, and Message Units/Extended Area). The amounts contained on the worksheets are supported by copies of monthly "Commonwealth of Virginia - Interagency Transfer Invoice for Telephone Service", which detail the same categories of cost that appear on the worksheets.

The Committee uses the average cost of scats, toll calls, other charges, and message units/extended area for a 4 month period (August 28, 1991 through December 28, 1991) it considers the "campaign period" and compares it to the average cost of similar charges for a 6 month period (January 28, 1991 through July 27, 1991) which precedes the "campaign period". The Committee then takes the average increase of each category, multiplies it by 4, and arrives at the cost the Committee should reimburse the Commonwealth, for use of State phones.

The calculation is deficient for a number of reasons:

- billing information for the period July 28, 1991 through August 27, 1991 is missing, and not used in the Committee's analysis.
- billing information for the period December 29, 1991 through January 27, 1992 is missing, and not used in the Committee's analysis.

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- the Committee considers the "campaign period" to be August 28, 1991 to December 28, 1991. However, the Candidate's exploratory committee registered in March 1991 and the campaign ended in January 1992 (the Candidate's DOI is 1/8/92). Further, an apparent one time charge ("other charges" September 1991 at \$2,535.19) could be a direct charge to the Committee because it appears to be for some increased level of activity, possibly additional telephone lines.
- the Committee did not include in its analysis any charge or average charge for the cost of the "Monthly Recurring Charges", which under its analysis would increase the amount due the Commonwealth of Virginia by approximately \$1,200.
- the Committee did not include in its analysis any charge or average charge for Federal, State, or local taxes normally associated with monthly telephone cost.

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The Committee submitted additional documentation on December 21, 1992. Specifically, the Committee submitted typed worksheets and copies of monthly "Commonwealth of Virginia - Interagency Transfer Invoice for Telephone Service", that support its worksheets, for the period April 1990 through February 1992. However, the Committee has revised its previous calculation (of \$5,104.44) and determined that the amount owed the Commonwealth for use of its telephones was \$3,344.60. The Committee calculated the average cost of scats, toll calls, other charges, and message units/extended area for the four month period and compared it the average cost of similar charges for the preceding 17 months and the subsequent 3 months following the "campaign period". It is the opinion of the Audit staff that the revised calculation is even less representative of the actual cost of campaign related telephone usage then its previous calculation. As a result, the Audit staff will not consider the revised calculation in the discussion that follows. Further, the Committee has also stated that telephone bills itemizing long distance calls were not (and at this stage cannot be) annotated as to whether a particular call was campaign related or official business of the Governor.

Absent the itemized phone bills, the Audit staff has analyzed the charges noted on the interagency transfer invoices for an 11 month period beginning March 1991 through January 1992, versus the same charges for the preceding 11 months (April 1990 through February 1991). According to the documentation made available, the cost of the Governor's office telephones for the 11 month period from April 1990 through February 1991 totaled \$49,372.54. The cost of telephones for the 11 month period during which the Candidate's campaign was active totaled \$57,244.40, an increase of \$7,871.86.

The difference between the amount calculated by the Audit staff (\$7,871.86) and the amount initially calculated by the Committee (\$5,104.44) is as follows:

- the Audit staff compared all costs noted on the interagency transfer invoices, where as the Committee did not include the "Monthly Recurring Charges".
- the Audit staff considered the relevant period to be March 1991 through January 1992, the Committee considered the "campaign period" to be September 1991 through December 1991.
- the Audit staff compared costs incurred during the 11 month active campaign period to costs incurred during the preceding 11 months. The Committee compared costs incurred during a 4 month period to costs incurred during a 6 month period which precedes, but not sequentially, its four month "campaign period".

It is our opinion that, based on the documentation made available, the Audit staff's calculation reasonably reflects the amount of campaign related usage of the Commonwealth's telephones. However, the interagency transfer invoices do not include the cost of Surcharges on equipment, Federal excise taxes, and local taxes, which are normally associated with telephone bills and; if incurred, should be prorated between the Committee and the Governors office.

On January 15, 1992, the Committee reimbursed the Treasurer of Virginia \$4,853.43 for its use of the Governor's credit card, a "Visa Business Card". In support of the payment the Committee submitted a schedule of 8 charges totaling \$2,692.91, a page from the December 1991 (closing date) billing statement, and receipts for 7 of the charges totaling \$2,321.60. Documentation for credit card charges totaling \$2,531.83 (\$4,853.43 - 2,321.60) has not been made available.

As a result, the undocumented portion, \$2,531.83, of the above payment is considered a non-qualified campaign expense (see Finding III.C.3.).

Recommendation #5

The Audit staff recommends that within 30 calendar days of service of this report, the Committee:

- ° with respect to the use of telephones, make a payment to the Commonwealth of \$2,871.86 (\$7,871.86 - 5,000) plus an amount that represents the increase in surcharges on equipment, federal excise taxes, and local taxes for the periods noted above; documentation to show the additional costs and the Committee's calculations are to be provided to the Audit staff; and

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- ° with respect to the use of the credit card, provide documentation to support the \$2,531.83 in apparent credit card charges.

Further recommendations will be forthcoming.

3. Campaign Related Services of Governor's Press Secretary

The Committee by check dated January 15, 1992, paid the Commonwealth \$7,795, which according to information made available represented reimbursement for the services of the Governor's Press Secretary during the last quarter of calendar year 1991. According to a photocopy of an undated, unsigned document entitled "Glenn Davidson Worksheet," reimbursement was requested for 1/3 of Mr. Davidson's salary and benefits paid by the Commonwealth for the three month period. According to the worksheet, 1/3 of his time was "campaign" [related] and 2/3 was "State" [non campaign related]. No information was made available with which to verify the various amounts listed or the time spent on the campaign.

On November 12, 1992, the Committee submitted documentation from the Commonwealth which details Glenn K. Davidson's 1991 salary plus the value of fringe benefits. In addition, Mr. Davidson submitted a signed statement, on Commonwealth letterhead, dated November 3, 1992, that states:

"I did not maintain any records regarding what percentage of my daily activities were campaign-related versus the percentage of time that was strictly in connection with State business (as I was not required to do so). However, to the best of my judgement and recollection, two-thirds of my work-related time was spent on State business, and the remaining one-third was campaign-related."

Recommendation #6

The Audit staff recommends no further action on this matter.

E. Use of Corporate Aircraft

Section 114.9(e) of Title 11 of the Code of Federal Regulations states, in part, that a candidate, candidate's agent or person traveling on behalf of a candidate who uses an airplane which is owned or leased by a corporation, other than a corporation licensed to offer commercial services, for travel in connection with a Federal election must, in advance, reimburse the corporation - in the case of travel to a city served by regularly scheduled commercial service, the first class air fare; in the case of travel to a city not served by regularly scheduled commercial service, the usual charter rate.

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On three separate occasions, aircraft owned by corporations were used for campaign related travel. The Audit staff reviewed the documentation made available by the Committee and identified three payments to three corporations totaling \$3,768. It must be noted that the Audit staff was unable to determine the actual amount billed to the Committee, since no corporate invoices were made available for review.

Notwithstanding the above, the Audit staff attempted to analyze the information in hand and determine whether the activity was conducted in accordance with 11 CFR 114.9(e). All three flight destinations were to cities served by regularly scheduled commercial service. Thus, in accordance with 11 CFR 114.9(e), the Committee was required to reimburse, in advance, the first class commercial airfare plus the cost of other services.

The Audit staff utilized airfares obtained from the General Services Administration Transportation Audit Division. The fares represent the lowest non-discounted first class rates available on the dates of the flights. Based on the Audit staff's analysis of six trip legs (three complete trips) identified, the respective reimbursements made by the Committee appear to be \$6,318 less than the required reimbursement amount (see Attachment 6).

The first class rate used by the Committee to calculate the reimburseable amount appears to be understated. Further, the Committee did not include several passengers in their calculation of the reimburseable amount.^{6/} Information available did not provide any indication as to whether these passengers were traveling on campaign related or non-campaign related business. In the absence of documentation to the contrary, the Audit staff has included the cost of these individuals' travel as campaign related.

When additional information becomes available, adjustments will be made as necessary.

Recommendation #7

The Audit staff recommends that within 30 calendar days of service of this report, the Committee provide the following:

- ° invoices generated by the corporations which detail, with supporting documentation, the amount billed to the Committee;
- ° information generated by the corporations which lists the passengers on each aircraft and an annotation by the

6/ The documentation made available during the fieldwork referred to a certain number of passengers on each flight. However, the same documentation submitted 10 days subsequent to the exit conference was annotated with names of additional passengers on each flight.

Committee or the Corporations, as appropriate, which details whether the passengers were considered as traveling on official or campaign related business and the basis for such determination;

- ° demonstrate that this activity is in accordance with 11 CFR 114.9(e); or
- ° make a payment to the United States Treasury in the amount of \$6,318.

III. Findings and Recommendations - Repayment Matters

A. Determination of Net Outstanding Campaign Obligations

Section 9034.5(a) of Title 11 of the Code of Federal Regulations requires that within 15 calendar days after the candidate's date of ineligibility, the candidate shall submit a statement of net outstanding campaign obligations which contains, among other items, the total of all outstanding obligations for qualified campaign expenses and an estimate of necessary winding down costs. Subsection (b) of this section states that the total of outstanding campaign obligations shall not include any accounts payable for non-qualified campaign expenses.

In addition, 11 C.F.R. §9034.1(b) states, in part, that if on the date of ineligibility a candidate has net outstanding campaign obligations as defined under 11 CFR §9034.5, that candidate may continue to receive matching payments provided that on the date of payment there are remaining net outstanding campaign obligations.

Governor Wilder's date of ineligibility was January 8, 1992, the date on which he concluded his campaign to seek the Democratic nomination. The Audit staff reviewed the Committee's financial activity through 6/30/92, analyzed estimates of winding down costs prepared by the Committee and developed the figures shown below. For comparison purposes the figures as presented in the NOCO statement filed by the Committee are also shown with material differences explained below.

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Notes to NOCO Statement Analysis

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- a/ This figure represents \$134,668.86 of the \$225,758.51 shown by the Committee; \$91,089.65 is excluded due to lack of adequate supporting documentation. Also included is \$106,753.47 in additional qualified accounts payable developed by the Audit staff based on our review of payments made 1/9/92-6/30/92. Should the Committee provide adequate documentation, the accounts payable figure will be adjusted accordingly.
- b/ The difference results from: (1) cases where the actual amounts paid to certain individuals were less than estimated amounts to be paid (\$12,725); (2) a case where the estimate (\$22,000) for one individual was later reduced by agreement between the parties; (3) the exclusion of \$17,300 in payments with the stated purpose "Severance" (see Finding II.C.1.); and (4) an overstatement of estimated January payroll (<\$3,702>).
- c/ ~~This represents an estimate. The Audit staff will review actual expenses incurred and adjustments will be made as necessary.~~
- d/ The Committee overestimated expenses.
- e/ The Committee overestimated expenses. Administrative costs are included in the \$57,000 estimate for legal fees and expenses.
- f/ The Committee initially said that this estimate was included for the purpose of a payroll review and preparation of necessary filings. The Committee agreed that the estimate should be eliminated from its NOCO because no one was hired to perform the payroll review. Finally, at the exit conference, the same Committee representative stated that the \$15,000 estimate was associated with the payments made to the Committee's Assistant Treasurers (see Finding II.C.2.).
- g/ See Findings II.A., B., and E.
- h/ The calculated deficit of \$32,566.26 is based on certain estimates. Also, approximately \$61,000 in expenses were excluded from the NOCO by the Audit staff due to insufficient documentation (see Attachment 7). Should the Committee provide adequate documentation for even a portion of the above amount, the deficit would increase.

B. Calculation of Repayment Ratio

Section 9038(b)(2)(A) of Title 26 of the United States Code states that if the Commission determines that any amount of any payment made to a candidate from the matching fund payment account was used for any purpose other than to defray the qualified campaign expenses with respect to which such payment was made it shall notify such candidate of the amount so used, and the candidate shall pay to the Secretary an amount equal to such amount.

Section 9038.1(c)(1)(v) of Title 11 of the Code of Federal Regulations states, in part, that the Commission will issue an interim audit report to the candidate and his authorized committee. The interim audit report may contain Commission findings and recommendations regarding preliminary calculations with respect to future repayments to the United States Treasury.

Section 9038.2(a)(2) of Title 11 of the Code of Federal Regulations states the Commission will notify the candidate of any repayment determination made under this section as soon as possible, but not later than 3 years after the end of the matching payment period. The Commission's issuance of an interim audit report to the candidate under 11 CFR 9038.1(c) will constitute notification for purposes of the 3 year period.

Section 9038.2(b)(2)(iii) of Title 11 of the Code of Federal Regulations states that the amount of any repayment sought under this section shall bear the same ratio to the total amount determined to have been used for non-qualified campaign expenses as the amount of matching funds certified to the candidate bears to the total amount of deposits of contributions and matching funds, as of the candidate's date of ineligibility.

Pursuant to 11 C.F.R. §9033.5(a), the Commission determined Governor Wilder's date of ineligibility to be January 8, 1992.

The formula and the appropriate calculation with respect to the Committee's receipt activity is as follows:

Total Matching Funds Certified/Received Through
The Date of Ineligibility - January 8, 1992

Numerator Plus Total Deposits Through Date of Ineligibility

$$\frac{\$198,315.39}{\$198,315.39 + \$507,052.83} = .281152$$

Thus, the repayment ratio for non-qualified campaign expenses is 28.1152%.

C. Apparent Non-Qualified Campaign Expenses

Section 9032(9) of Title 26 of the United States Code defines, in part, the term "qualified campaign expense" as a purchase or payment incurred by a candidate, or by his authorized committee made in connection with his campaign for nomination which neither the incurring of nor payment of constitutes a violation of any law of the United States or of the state in which the expense is incurred or paid.

Section 9038.2(b)(2) of Title 11 of the Code of Federal Regulations states, in relevant part, that the Commission may determine that amounts of any payments made to a candidate from the matching payment account were used for purposes other than to defray qualified campaign expenses. The amount of any repayment under this section shall bear the same ratio to the total amount determined to have been used for non-qualified campaign expenses as the amount of matching funds certified to the candidate bears to total deposits, as of the candidates date of ineligibility.

1. Severance Payments Made by the Committee

The Committee paid \$15,300 in severance to 11 individuals on January 29 and 30, 1992 ~~7/~~ (see Attachment 8). No employment agreements or other documentation was made available with respect to these payments other than the checks themselves and a typed list of payments prepared by the Committee. Five of the individuals continued to receive compensation through June 1992, approximately four months after receiving the severance payments. Generally, the amount of severance paid was approximately equal to one month's compensation. 8/

2. Questionable Salary Payments

Ruth M. Jones (Governor's personal secretary/Office Manager) and William M. Keough, Jr. (Office of the Governor - Deputy Director of Constituent Affairs) each of whom were assistants to the Treasurer of the Committee received \$10,000 and \$5,000 respectively on January 29, 1992. According to the list of payments prepared by the Committee, the "duration" [of work] for both Ms. Jones and Mr. Keough was "April [sic] 1, 1991 through

7/ Another individual received a \$2,000 severance payment on February 19, 1992. On February 4, 1992, the Committee's remaining entitlement was \$30,806.26 (see Finding D). On February 12, 1992, the Committee no longer had matching funds (it was entitled to) in its account, therefore, no repayment is sought at this time (see Finding III.D.).

8/ Two individuals received their first compensation in January 1992; three in December 1991; one in November; three in October; one in August, and one in April.

present" [January 31, 1992.] Ms. Jones also received a \$4,000 payment, dated 5/29/92 9/ identified as consulting fees. Ms. Jones, during the period September 1991 - January 21, 1992 received \$2,400 in compensation from the Committee. According to the Committee, she reviewed invoices and prepared checks for the Treasurer's signature. Mr. Keough received no prior compensation from the Committee. No information was made available as to the specific duties he performed. A Committee representative stated that the Commission has previously allowed presidential committees to pay severance.

With respect to both the \$15,300 in severance payments and the \$15,000 paid to Ms. Jones (\$10,000) and Mr. Keough (\$5,000), it is the Audit staff's opinion that, based on the information provided to date, these expenses are non-qualified campaign expenses.

3. Undocumented Disbursements

Finally, the Committee made 11 payments, totaling \$11,582.81, to individuals/vendors (see Attachment 9). The necessary supporting documentation for these expenses was not made available for review. As a result, the Audit staff was unable to determine whether the expenses were campaign related and accordingly, the disbursements were considered non-qualified campaign expenses.

Recommendation #8

The Audit staff recommends that within 30 calendar days of service of this report, the Committee submit documentation which demonstrates that the expenses noted above are qualified campaign expenses. Absent such demonstration, the Audit staff will recommend that the Commission make an initial determination that the Committee make a pro rata repayment of \$11,775.44 (\$41,882.81 x .281152) to the United States Treasury pursuant to 26 U.S.C. §9038(b)(2).

D. Matching Funds Received in Excess of Entitlement

Section 9038(b)(1) of Title 26 of the United States Code states 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 an amount equal to the amount of excess payments.

Section 9034.1(b) of Title 11 of the Code of Federal Regulations states if on the date of ineligibility a candidate has net outstanding campaign obligations as defined under 11 CFR

9/ See footnote 7.

§9034.5, that candidate may continue to receive matching payments for matchable contributions received and deposited on or before December 31 of the Presidential election year provided that on the date of payment there are remaining net outstanding campaign obligations, i.e., the sum of the contributions received on or after the date of ineligibility plus matching funds received on or after the date of ineligibility is less than the candidate's net outstanding campaign obligations. This entitlement will be equal to the lesser of: (1) the amount of contributions submitted for matching; or (2) the remaining net outstanding campaign obligations.

Based on our analysis of the NOCO statement filed by the Committee, it appears that, based on information currently available, the candidate was entitled to an additional \$32,566.26 on his date of ineligibility (see Finding III.A.). Further, the Audit staff identified private contributions totaling \$1,760 that were apparently received during the period January 9, 1992 through January 23, 1992. It should be noted that the above contributions were deposited on February 12, 1992 and March 18, 1992. Consequently, the Audit staff has reduced the Committee's entitlement, resulting in a remaining entitlement on February 4, 1992 of \$30,806.26 (\$32,566.26 - 1,760).

As a result, the matching fund payment on February 4, 1992 (\$90,711.28), was \$59,905.02 (\$90,711.28 - 30,806.26) in excess of the Candidate's entitlement.^{10/}

Recommendation #9

The Audit staff recommends that within 30 calendar days of service of this report, the Committee demonstrate that it has not received matching funds in excess of entitlement. Absent such a showing, the Audit staff will recommend that the Commission make an initial determination that the Committee was not entitled to \$59,905.02 in matching funds received on February 4, 1992 pursuant to 11 C.F.R. §9038.2(b)(1)(i), and that the Committee repay \$59,905.02 to the United States Treasury pursuant to 26 U.S.C. §9038(b)(1).

^{10/} This amount is subject to change since certain estimates are included in the calculation. In addition, certain expenses presently excluded for NOCO purposes if adequately documented may reduce this amount.

050/0192

E. Recap of Amounts due the United States Treasury

1.	Payment for Excessive Contributions (Finding II.A.)	\$ 5,200.00
2.	Payment for Prohibited Contributions (Finding II.B.)	3,983.63
3.	Apparent Non-Qualified Campaign Expenses (Finding III.C.)	11,775.44
4.	Payment for Underbilling of Corporate Aircraft (Finding II.E.)	6,318.00
5.	Matching Funds Received in Excess of Entitlement (Finding III.D.)	59,905.02
	Total Amount Due	<u>\$87,182.09</u>

950701221

WILDER FOR PRESIDENT COMMITTEE
INTERIM AUDIT REPORT

059/0122
Adjusted Receipts
(Through December 31, 1992)

	Federal Matching Funds	Individual Contributions Minus Refunds	PAC's and Other Cmte Contrib Minus Refunds	Contributions from the Candidate	Candidate Loans Minus Repayments	Other Loans Minus Repayments	Other Receipts	Adjusted Total Receipts	Additional Matching covered by the release submitted 1/3/93
Democrats									
Larry Agran	\$289,691	\$331,631	\$0	\$500	\$6,000	\$1,020	\$2,887	\$610,736	\$0
Jerry Brown	\$4,239,345	\$5,175,876	\$0	\$0	\$0	\$0	\$4,200	\$9,419,421	\$0
Bill Clinton	\$12,518,130	\$25,183,298	\$5,204	\$0	\$0	\$1	\$9,219	\$37,715,852	\$0
Tom Hartin	\$2,008,703	\$3,057,748	\$489,809	\$4,533	\$0	\$0	\$7,833	\$5,568,826	\$75,823
Bob Kerrey	\$2,116,745	\$3,904,822	\$352,857	\$0	\$0	(\$1,225)	\$5,893	\$4,380,692	\$50,486
Lyndon LaRouche	\$0	\$1,570,875	\$0	\$0	\$0	\$0	\$0	\$1,570,875	\$0
Paul Tsongas	\$2,922,807	\$4,934,453	\$3,568	\$0	\$46,000	(\$9,575)	\$0	\$7,896,251	\$38,266
Doug Wilder	\$269,026	\$508,519	\$760	\$0	\$0	\$0	\$1,039	\$799,334	\$0
Total Democrats	\$24,366,447	\$44,667,022	\$851,986	\$5,033	\$60,000	(\$9,770)	\$21,071	\$69,981,789	\$184,575
Republican									
Patrick Buchanan	\$4,848,200	\$7,144,107	\$24,750	\$0	\$0	\$0	\$3,442	\$12,020,499	\$75,839
George Bush	\$10,118,248	\$26,997,770	\$44,150	\$0	\$0	\$0	\$218,188	\$37,378,354	\$0
David Duke*	\$0	\$220,715	\$0	\$0	\$1,000	\$0	\$0	\$221,715	\$0
Total Republicans	\$14,966,448	\$34,362,592	\$68,900	\$0	\$1,000	\$0	\$221,630	\$49,670,668	\$75,839
Other Party									
Andre Marrou*	\$0	\$562,770	\$181	\$116	\$15,000	\$0	\$0	\$578,067	\$0
Lenora Fulan	\$1,935,524	\$2,201,407	\$0	\$325	(\$1,258)	\$1,200	\$0	\$4,137,198	\$0
Total Other Party	\$1,935,524	\$2,764,177	\$181	\$441	\$13,742	\$1,200	\$0	\$4,715,265	\$0
Grand Total	\$41,268,417	\$81,793,791	\$921,067	\$5,474	\$84,742	(\$8,570)	\$252,701	\$124,347,722	\$240,214

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25070192006
Adjusted Disbursements
(Through December 31, 1992)

	Operating Expenditures Minus Offsets	Exempt Fundraising Minus Offsets	Exempt Legal/Accounting Minus Offsets	Other Disburse	Adjusted Total Disbursements	Expenditures Subject to Limit	Latest Cash On Hand	Debt Owed By the Campaign
Democrats								
Larry Agran	\$598,760	\$0	\$0	\$95	\$598,845	\$606,117	\$10,866	\$6,970
Jerry Brown	\$6,399,824	\$2,278,837	\$204,607	\$108,684	\$8,991,862	\$6,876,171	\$143,091	\$0
Bill Clinton	\$27,716,791	\$3,497,598	\$1,909,826	\$55,101	\$33,179,316	\$27,716,798	\$2,729,467	\$0
Tom Harkin	\$3,825,304	\$1,184,978	\$170,402	\$0	\$5,180,684	\$3,968,209	\$171,990	\$146,420
Bob Kerrey	\$5,355,053	\$1,057,895	\$162,642	\$23,404	\$6,599,194	\$5,987,258	\$14,141	\$31,716
Lyndon LaRouche	\$1,488,653	\$0	\$65,915	\$0	\$1,554,768	\$1,488,656	\$16,107	\$27,922
Paul Tsongas	\$6,557,914	\$754,978	\$164,452	\$0	\$7,477,344	\$6,963,601	\$45,625	\$164,288
Doug Wilder	\$776,722	\$6,568	\$39	\$0	\$783,329	\$783,294	\$16,002	\$341
Total Democrats	\$52,719,211	\$8,780,654	\$2,678,083	\$187,184	\$64,365,332	\$54,080,304	\$3,147,289	\$379,659
Republicans								
Patrick Buchanan	\$11,173,605	\$0	\$0	\$0	\$11,173,605	\$11,173,606	\$934,729	\$3,027
George Bush	\$27,183,036	\$5,524,000	\$4,560,271	\$0	\$37,267,307	\$27,183,037	\$62,715	\$190,526
David Duke	\$353,838	\$0	\$0	\$1,000	\$354,838	\$0	\$0	\$29,250
Total Republicans	\$38,710,479	\$5,524,000	\$4,560,271	\$1,000	\$48,795,750	\$38,356,643	\$997,444	\$222,803
Other Party								
Andre Marrou*	\$416,676	\$160,219	\$0	\$0	\$576,795	\$0	\$0	\$0
Lenora Fulani	\$4,101,295	\$0	\$0	\$3,235	\$4,104,530	\$4,124,158	\$59,840	\$52,024
Total Other Party	\$4,518,871	\$160,219	\$0	\$3,235	\$4,680,325	\$4,124,158	\$59,840	\$52,024
Total	\$95,946,561	\$14,465,073	\$7,238,354	\$191,419	\$117,841,407	\$96,571,105	\$4,204,573	\$654,466

AT
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Total
Grand Total
26
36

Wilder for President Committee
Schedule of Apparent Excessive Contributions

Contributor	Date of Deposit	Amount of Contribution	Total Contribution	Amount Excessive
1. Thomas J. Berenguer 646 S. Atlantic Ave. Virginia Beach, VA 23451	15-Apr-91	\$1,000	\$4,000	\$3,000
	15-Apr-91	\$1,000		
	15-Apr-91	\$1,000		
	15-Apr-91	\$1,000		
2. Mary Freeman Cheek 4703 Pocahontas Ave. Richmond, VA 23226	30-Sep-91	\$1,000	\$1,100	\$100
	10-Dec-91	\$100		
3. Reginald C. Jackson, MD P.O. Box 26084 Richmond, VA 23260	11-Nov-91	\$1,000	\$2,000	\$1,000
	05-Dec-91	\$1,000		
4. H.B. Mack 370 W. Passaic ST Rochelle Park, NJ 07662	13-Dec-91	\$2,000	\$2,000	\$1,000
5. Lawrence D. Wilder, Jr. 2509 E. Broad ST Richmond, VA 23223	13-Nov-91	\$500	\$1,100	\$100
	20-Dec-91	\$500		
	12-Feb-92	\$100		
----- Total Apparent Excessive Contributions				\$5,200 -----

Wilder for President Committee
Schedule of Apparent Prohibited Contributions

Contributor	Date of Incorporation	Check Date	Amount
1. Asprey 726 Fifth Avenue New York, New York 10022	07-May-91	05-Nov-91	\$250
2. J.Kopf CMA Enterprises LTD 304 Park Avenue South New York, New York 10010	23-Oct-79	20-Nov-91	\$1,000
3. Lindley T. Smith, MD, PC Opthamology Second & Franklin ST, Ste 102 Richmond, VA 23219	01-Feb-80	ILLEGIBLE	\$250
----- Total Apparent Prohibited Contributions:			\$1,500 -----

95070122

VALUES FOR VOUCHER CONVERTING
ANNUALS OF CONVERTING USE OF COMMERCIAL BLANKS
(Substantiated to Commissioner of Virginia
compared to direct class schedule for 2010)

(1) Date of Trip	(2) Depart/Arrive	(3) # of Passengers (6)	(4) # of Passengers (6)	(5) # of Passengers (6)	(6) # of Passengers (6)	(7) Total # Flight hours	(8) Total # Flight hours	(9) Total # Flight hours	(10) Other (10)	(11) Total (11)	(12) Total (12)	(13) Total (13)	(14) Cost of Class (14)	(15) Cost of Class (15)	(16) No. of Staff (16)	(17) Total Cost per Leg (17)	(18) Total Cost (18)	(19) Amt. W/holded (19)	
1 03-Sep-01	1. Richmond VA to San Antonio TX	2	2	2	2	2.0	2.0	\$1,102.50		\$1,102.50		\$674.00	\$674.00	2	\$337.00	\$1,341.00	\$674.00		
2 04-Sep-01	2. San Antonio TX to Richmond VA	2	2	2	2	2.1	2.1	\$1,112.50		\$1,112.50		\$674.00	\$674.00	2	\$322.00	\$1,463.00	\$674.00		
3	Pilot's expenses							\$135.00		\$135.00									
4	Chartering for passengers							\$61.25		\$61.25									
5	05-Sep-01	3. Richmond VA to Cleveland OH	2	2	2	2	1.3	\$612.50		\$612.50			\$348.00	\$348.00	2	\$268.00	\$612.50		
6	Pilot's expenses (one day)							\$61.25		\$61.25									
7	06-Sep-01	4. Cleve., OH to Oklahoma City OK (MO)	3	3	3	3	3	\$1,475.00		\$1,475.00			\$466.00	\$466.00	3	\$1,765.00	\$1,475.00		
8	Pilot's expenses (one day)							\$61.25		\$61.25									
9	07-Sep-01	5. Oklahoma City OK (MO) to Richmond VA	3	3	3	3	2.6	\$1,625.00		\$1,625.00			\$773.00	\$773.00	3	\$2,378.00	\$1,625.00		
10	Chartering for passengers							\$61.25		\$61.25									
11	Pilot's expenses (one day)							\$61.25		\$61.25									
12	14-Sep-01	6. Richmond VA to Tebechere MD	2	2	2	2	1.9	\$1,167.50		\$1,167.50			\$364.00 (A)	\$364.00 (A)	2	\$768.00	\$1,531.50		
13	Tebechere MD to Richmond VA	2	2	2	2	3	3	\$1,167.50		\$1,167.50			\$364.00 (A)	\$364.00 (A)	2	\$768.00	\$1,531.50		
14	Pilot's expenses							\$61.25		\$61.25									
15	17-Sep-01	8. Richmond to JFK	1	1	1	1	2	\$1,250.00		\$1,250.00			\$364.00	\$364.00	2	\$768.00	\$1,250.00		
16	JFK to Richmond	1	1	1	1	1	1	\$134.73		\$134.73			\$364.00	\$364.00	1	\$364.00	\$1,250.00		
17	Parting/Landing Fees							\$134.73		\$134.73									
18	21-Sep-01	9a. Richmond to JFK	1	1	1	1	2	\$1,250.00		\$1,250.00			\$364.00	\$364.00	1	\$364.00	\$1,250.00		
19	JFK to Richmond	1	1	1	1	1	1	\$134.73		\$134.73			\$364.00	\$364.00	2	\$768.00	\$1,250.00		
20	Parting/Landing Fees							\$134.73		\$134.73									
21	27-Sep-01	11. Richmond VA to Washington D.C.	1	1	1	1	1	\$125.00		\$125.00			\$125.00	\$125.00	1	\$125.00	\$125.00		
22	Washington D.C. to Richmond	1	1	1	1	1	1	\$125.00		\$125.00			\$125.00	\$125.00	1	\$125.00	\$125.00		
23	13. Richmond to Miami FL	2	2	2	2	2	2	\$448.00		\$448.00			\$448.00	\$448.00	2	\$448.00	\$448.00		
24	14. Miami FL to Orlando FL	2	2	2	2	2	2	\$112.00		\$112.00			\$112.00	\$112.00	2	\$112.00	\$112.00		
25	15. Orlando FL to Richmond	2	2	2	2	2	2	\$341.00		\$341.00			\$341.00	\$341.00	1	\$341.00	\$341.00		
26	Parting/Landing Fees							\$19.00		\$19.00									
27	Pilots' Expenses							\$411.77		\$411.77									
28	19-Oct-01	18a. Richmond VA to San Antonio TX	1	1	1	1	1	\$125.00		\$125.00			\$125.00	\$125.00	1	\$125.00	\$125.00		
29	San Antonio TX to Richmond VA	1	1	1	1	1	1	\$125.00		\$125.00			\$125.00	\$125.00	1	\$125.00	\$125.00		
30	Pilot's expenses							\$125.00		\$125.00									
31	19-Oct-01	19. Richmond VA to Chicago IL	2	2	2	2	2	\$415.00		\$415.00			\$415.00	\$415.00	2	\$415.00	\$415.00		
32	Chicago IL to Norfolk VA	2	2	2	2	2	2	\$553.00 (A)		\$553.00 (A)			\$553.00 (A)	\$553.00 (A)	2	\$553.00	\$553.00		
33	21. Norfolk VA to Tampa FL	2	2	2	2	2	2	\$279.00 (A)		\$279.00 (A)			\$279.00 (A)	\$279.00 (A)	2	\$279.00	\$279.00		
34	22. Tampa FL to St. Louis MO	2	2	2	2	2	2	\$468.00 (B)		\$468.00 (B)			\$468.00 (B)	\$468.00 (B)	2	\$468.00	\$468.00		
35	23. St. Louis MO to Richmond VA	2	2	2	2	2	2	\$602.00		\$602.00			\$602.00	\$602.00	2	\$602.00	\$602.00		
36	24. Richmond VA to Winchester VA	2	2	2	2	2	2	\$441.00		\$441.00			\$441.00	\$441.00	2	\$441.00	\$441.00		
37	25. Winchester VA to Richmond VA	2	2	2	2	2	2	\$441.00		\$441.00			\$441.00	\$441.00	2	\$441.00	\$441.00		
38	Chartering for passengers							\$764.44		\$764.44									
39	Pilot's expenses							\$19.00		\$19.00									
40	29-Oct-01	20. Richmond VA to Winchester VA	2	2	2	2	2	\$441.00		\$441.00			\$441.00	\$441.00	2	\$441.00	\$441.00		
41	Winchester VA to Richmond VA	2	2	2	2	2	2	\$441.00		\$441.00			\$441.00	\$441.00	2	\$441.00	\$441.00		
42	Chartering for passengers							\$764.44		\$764.44									
43	Pilot's expenses							\$19.00		\$19.00									
44	29-Oct-01	21. Richmond VA to Chicago IL	2	2	2	2	2	\$415.00		\$415.00			\$415.00	\$415.00	2	\$415.00	\$415.00		
45	Chicago IL to Norfolk VA	2	2	2	2	2	2	\$553.00 (A)		\$553.00 (A)			\$553.00 (A)	\$553.00 (A)	2	\$553.00	\$553.00		
46	21. Norfolk VA to Tampa FL	2	2	2	2	2	2	\$279.00 (A)		\$279.00 (A)			\$279.00 (A)	\$279.00 (A)	2	\$279.00	\$279.00		
47	22. Tampa FL to St. Louis MO	2	2	2	2	2	2	\$468.00 (B)		\$468.00 (B)			\$468.00 (B)	\$468.00 (B)	2	\$468.00	\$468.00		
48	23. St. Louis MO to Richmond VA	2	2	2	2	2	2	\$602.00		\$602.00			\$602.00	\$602.00	2	\$602.00	\$602.00		
49	24. Richmond VA to Winchester VA	2	2	2	2	2	2	\$441.00		\$441.00			\$441.00	\$441.00	2	\$441.00	\$441.00		
50	25. Winchester VA to Richmond VA	2	2	2	2	2	2	\$441.00		\$441.00			\$441.00	\$441.00	2	\$441.00	\$441.00		

VALUES FOR MEMBERS COMMITTEE
MEMBERS OF COMMITTEE'S USE OF COMPENSATION PLANS
(Subcommittee on Commensality of Virginia
compared to first class elsewhere for trips)

(1) Date of Trip	(2) Depart/Arrive	(3) # of Passengers	(4) # of Passengers	(5) # of Passengers	(6) # of Passengers	(7) # of Passengers	(8) # of Passengers	(9) # of Passengers	(10) # of Passengers	(11) # of Passengers	(12) # of Passengers	(13) # of Passengers	(14) # of Passengers	(15) # of Passengers	(16) # of Passengers	(17) # of Passengers	(18) # of Passengers	(19) # of Passengers			
43	Flights overnight expenses																		\$1,807.00	\$33,541.54	
44	26.Richmond VA to Washington DC	2	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
45	27.Washington DC to Richmond VA	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2
46	28.Washington DC to Richmond VA	1	0	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
47	29.Richmond VA to Washington D.C.	1	0	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
48	30.Washington DC to Newville TN	2	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
49	31.Newville TN to Richmond VA	2	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
50	32.Richmond VA to Washington DC	4	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
51	33.Washington DC to Richmond VA	3	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
52	34.Richmond VA to Richmond VA	3	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
53	35.Richmond VA to Washington DC	2	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
54	36.Detroit MI to Richmond VA	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2
55	37.Richmond VA to Boston MA	3	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2
56	38.Boston MA to Richmond VA	3	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2
57	39.Richmond VA to Norfolk VA	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2
58	40.Norfolk VA to Norfolk VA	2	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
59	41.Norfolk VA to Norfolk VA	2	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
60	42.Norfolk VA to Norfolk VA	2	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
61	43.Norfolk VA to Norfolk VA	2	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
62	44.Norfolk VA to Norfolk VA	2	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
63	45.Norfolk VA to Norfolk VA	2	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
64	46.Norfolk VA to Norfolk VA	2	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
65	47.Norfolk VA to Norfolk VA	2	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
66	48.Norfolk VA to Norfolk VA	2	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
67	49.Norfolk VA to Norfolk VA	2	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
68	50.Norfolk VA to Norfolk VA	2	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
69	51.Norfolk VA to Norfolk VA	2	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
70	52.Norfolk VA to Norfolk VA	2	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
71	53.Norfolk VA to Norfolk VA	2	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
72	54.Norfolk VA to Norfolk VA	2	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
73	55.Norfolk VA to Norfolk VA	2	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
74	56.Norfolk VA to Norfolk VA	2	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
75	57.Norfolk VA to Norfolk VA	2	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
76	58.Norfolk VA to Norfolk VA	2	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
77	59.Norfolk VA to Norfolk VA	2	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
78	60.Norfolk VA to Norfolk VA	2	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
79	61.Norfolk VA to Norfolk VA	2	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
80	62.Norfolk VA to Norfolk VA	2	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
81	63.Norfolk VA to Norfolk VA	2	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
82	64.Norfolk VA to Norfolk VA	2	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1

MEMORANDUM FOR IMMEDIATE COPIES
ANALYSIS OF CAMPAIGN'S USE OF COMMERCIAL FLIGHTS
(In accordance with the provisions of Virginia
Code, § 2.1-401.1, which requires that the
costs of flight class airfare for trips)

(1) Date of Trip	(2) Depart/Arrive	(3) (4) (5) # of Passengers (6)	(7) Total Flight Hours	(8) Other Expenses (cl. 8.2 ACS/Air use) (9)	(10) Trip/Log Total (9)+(10)	(11) Amount Billed to Committee	(12) Number of Seats per Charter & Other	(13) Cost of Charter & Other	(14) Cost of Seats per Charter & Other	(15) Total Cost	(16) Total Cost	(17) Total Cost	(18) Total Cost	(19) Total Cost	(20) Total Cost
Total:															
\$25,387.50															
\$0.00															

87 FOOTNOTES:

88 (71) Press - Identified as press related per typed itinerary

89 (72) Staff - Identified as campaign related per reimbursement letter

90 (73) Staff - used to represent the number of Executive Protective Staff accompanying Governor Walker

91 Other - not identified as campaign related, no names given for non campaign related

92 (74) Other - not identified as campaign related, no names given for non campaign related

93 (75) Subs for chartering SWA Ocean Club/Atlantic State Jet from Commonwealth of Virginia

94 (76) Pure Information from General Services Administration - Transportation

95 Audit Division (2008) - Passenger Information Pricing/Revenue System

96 (77) Airfare based on a flight to the nearest city, on route, which is served by a direct commercial flight. For example, there was no commercial service to Washington, DC in July 06 & 07 thus, the GSA representative used airfare from Richmond to Newark.

97 (78) Airfare based on a flight between two locations, with an intermediate landing point. For example, there was no direct commercial flight from Tampa to St. Louis thus, the GSA representative used airfare from Tampa to Kansas City to St. Louis

98 The flight log information provided from the Commonwealth did not provide any information regarding these flights; flight information was taken from the Committee's itinerary and accompanying brochures from the Commonwealth.

99 Per flights where the Commonwealth plane was removed from Richmond to a destination to pick up campaign related passengers and make a campaign related trip, the cost for that leg was calculated as if one campaign related person was onboard.

100 No cost was calculated for these flights, considered non-campaign flights.

101 The total passengers used in each leg of the analysis corresponds to the total passengers listed on the Commonwealth's flight log for that leg. In order to identify which passengers were "staff", "press", and "other", the author used the numbers from the Commonwealth and itinerary provided by the Committee. IF THIS IS FOUND TO BE AN ERROR IN THE ITINERARY FOR THE PUBLIC USE AND FOR THE TRANSPORTATION/AVIATION DIVISION

Wilder for President Committee
Schedule of Payments to the Treasurer of Virginia

(1) Date of Payment	(2) Service Provided	(3) Amount
1	28-Jun-91 Use of VA facility	\$1,257.54
2	28-Jun-91 Use of VA plane-legs 1 & 2	\$3,323.08
3	28-Jun-91 Use of VA plane-legs 3 & 5	\$4,647.39
4	28-Jun-91 Use of VA plane-legs 6 & 7	\$1,187.50
5	28-Jun-91 Executive Mans.-Dinner	\$1,525.59
6	02-Aug-91 Executive Mans.-Dinner	\$1,152.07
7	21-Aug-91 Use of VA plane-legs 11-15	\$2,930.77
8	21-Aug-91 dinner expense	\$45.03
9	10-Sep-91 reception	\$877.39
10	25-Sep-91 catering	\$434.59
11	20-Oct-91 breakfast reception	\$113.12
12	05-Dec-91 columnists luncheon	\$182.44
13	05-Dec-91 Use of VA plane-legs 18 19-25 29-31 35-36 37-38	\$9,236.50
14	12-Dec-91 construction for press conference	\$2,307.06
15	02-Jan-92 Use of phones	\$5,000.00
16	08-Jan-92 Use of VA plane-legs 8-10 26-28 32-34 39-45 48-54	\$14,435.72
17	16-Jan-92 Sound system- Presidential announcement	\$350.00
18	15-Jan-92 Visa-travel expense	\$4,853.43
19	15-Jan-92 Reimbursement for services by G.Davidson	\$7,795.00
20	23-Jan-92 Use of VA helicopter (state police heli.)	\$6,525.00
21	29-Jan-92 reimbursement for travel	\$35.84
22	07-Feb-92 reception	\$1,456.65
23	07-Feb-92 reimbursement for expenses/telephone	\$77.00
24	28-Feb-92 reimbursement for expenses/Federal Express	\$15.50
25	04-Mar-92 reimbursement for expenses	\$294.50
26	05-Mar-92 reimbursement for expenses	\$49.00
27	11-Mar-92 reimbursement for expenses	\$535.46
28	15-Apr-92 reimbursement for expenses	\$86.25
Total Paid:		\$70,730.02

WELFARE FOR MEMBERS' CONFINEMENT COMPENSATION
Corporate Filipinos by Campaign

(1) Date of Trip	(2) Depart/Arrive	(3) # of Passengers	(4) # of Passengers	(5) # of Passengers	(6) # of Passengers	(7) Total	(8) # Flight hours (cl. 8 x (6)/(24)hr)	(9) Total	(10) Total	(11) Total	(12) Total	(13) Cost of Seat per CNY (16)	(14) Cost of Seat per CNY (16)	(15) Total	(16) Total	(17) Total	(18) Amount
1	15-Dec-08	17	17	17	17	17	17	17	17	17	17	17	17	17	17	17	17
2	17-Dec-08	17	17	17	17	17	17	17	17	17	17	17	17	17	17	17	17
3	02-Jan-09	43	43	43	43	43	43	43	43	43	43	43	43	43	43	43	43
4	03-Jan-09	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47
5	04-Jan-09	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47
6	05-Jan-09	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47
7	06-Jan-09	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47
8	07-Jan-09	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47
9	08-Jan-09	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47
10	09-Jan-09	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47
11	10-Jan-09	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47
12	11-Jan-09	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47
13	12-Jan-09	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47
14	13-Jan-09	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47
15	14-Jan-09	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47
16	15-Jan-09	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47
17	16-Jan-09	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47
18	17-Jan-09	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47
19	18-Jan-09	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47
20	19-Jan-09	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47
21	20-Jan-09	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47
22	21-Jan-09	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47
23	22-Jan-09	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47
24	23-Jan-09	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47
25	24-Jan-09	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47
26	25-Jan-09	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47
27	26-Jan-09	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47
28	27-Jan-09	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47
29	28-Jan-09	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47
30	29-Jan-09	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47
31	30-Jan-09	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47
32	31-Jan-09	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47
33	01-Feb-09	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47
34	02-Feb-09	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47
35	03-Feb-09	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47
36	04-Feb-09	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47
37	05-Feb-09	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47
38	06-Feb-09	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47
39	07-Feb-09	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47
40	08-Feb-09	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47
41	09-Feb-09	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47
42	10-Feb-09	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47
43	11-Feb-09	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47
44	12-Feb-09	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47
45	13-Feb-09	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47
46	14-Feb-09	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47
47	15-Feb-09	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47
48	16-Feb-09	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47
49	17-Feb-09	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47
50	18-Feb-09	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47
51	19-Feb-09	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47
52	20-Feb-09	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47
53	21-Feb-09	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47
54	22-Feb-09	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47
55	23-Feb-09	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47
56	24-Feb-09	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47
57	25-Feb-09	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47
58	26-Feb-09	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47
59	27-Feb-09	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47
60	28-Feb-09	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47
61	29-Feb-09	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47
62	01-Mar-09	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47
63	02-Mar-09	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47
64	03-Mar-09	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47
65	04-Mar-09	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47
66	05-Mar-09	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47
67	06-Mar-09	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47
68	07-Mar-09	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47
69	08-Mar-09	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47
70	09-Mar-09	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47
71	10-Mar-09	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47
72	11-Mar-09	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47
73	12-Mar-09	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47
74	13-Mar-09	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47
75	14-Mar-09	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47
76	15-Mar-09	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47
77	16-Mar-09	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47	47
78	17-Mar-09	47															

WILDER FOR PRESIDENT COMMITTEE

SCHEDULE OF ACCOUNTS PAYABLE
NOT CONSIDERED
QUALIFIED CAMPAIGN EXPENSES

VENDOR	DATE PAID	AMOUNT	REASON
1 C & P Telephone	see F5	\$1,470.96	Not Documented F5
2 Sarah Callahan	27-Jan-92	\$457.46	Not Documented
3 Robert Ford	see F5	\$434.40	Not Documented F5
4 The Gorman Group	see F5	\$10,000.00	Not Documented F1, F5
5 Grassroots Systems	30-Jan-92	\$500.00	Not Documented
6 Linda Hatch	see F5	\$480.00	Not Documented F2, F5
7 Lasser & Assoc.	see F5	\$10,000.00	Not Documented F5, F6
8 Steven Rossiter	15-Jan-92	\$400.00	Not Documented
9 Gary Foster	15-Jan-92	\$400.00	Not Documented
10 Jefferson Hotel	17-Jan-92	\$2,500.00	Not Documented
11 William Keough	29-Jan-92	\$5,000.00	Not Documented
12 Ruth Jones	29-Jan-92	\$10,000.00	Not Documented
13 John Brazell	19-Feb-92	\$2,000.00	Not Documented
14 First Consumers	20-Feb-92	\$814.00	Not Documented
15 Ron Lester	15-Apr-92	\$2,392.30	Not Documented
16 Nicholas Perrins	30-Apr-92	\$171.41	Not Documented
17 Federal Express	12-May-92	\$456.75	Not Documented F3
18 Ruth Jones	29-May-92	\$4,000.00	Not Documented
19 Marshall Keys	17-Jan-92	\$1,000.00	Not Documented
20 AT & T	12-Jun-92	\$371.60	Not Documented
21 AT & T	12-Jun-92	\$23.68	Not Documented
22 Pitney Bowes	12-Jun-92	\$2,180.32	Not Documented
23 AT & T	25-Mar-92	\$406.00	Not Documented
24 AT & T	12-May-92	\$83.45	Not Documented
25 C & P Telephone	30-Jan-92	\$592.61	Not Documented F4
26 C & P Telephone	02-Jan-92	\$553.86	Not Documented F4
27 C & P Telephone	04-Feb-92	\$1,134.05	Not Documented F4
28 C & P Telephone	01-Apr-92	\$584.07	Not Documented
29 Trsr of Virginia	15-Jan-92	\$2,531.83	Not Documented F7

Total

\$60,938.75

FOOTNOTES:

- F1 Job order cancelled.
- F2 Audit staff recognized \$378.50 for travel in 12-91.
- F3 Documentation in vendor file supports only \$786.00: diff. \$456
- F4 Need entire phone billing for documentation.
- F5 No date can be identified; items listed on Committee's accounts payable NOCO schedule, but no disbursement record can be found.
- F6 Documentation supports \$826.48; \$9,173.52 difference is undocumented
- F7 Payment for use of credit card = \$4,853.45; \$2,531.83 represent undocumented portion

WILDER FOR PRESIDENT COMMITTEE
SCHEDULE OF SEVERANCE PAYMENTS

(1) PAYEE	(2) DATE	(3) AMOUNT	
1 India Adeos	29-Jan-92	\$1,600.00	F1
2 Scott Bates	30-Jan-92	\$1,500.00	
3 Sarah Callahan	29-Jan-92	\$1,800.00	
4 Eric Easter	29-Jan-92	\$2,000.00	
5 John Hotchkiss	29-Jan-92	\$1,200.00	
6 Nicholas Perrins	30-Jan-92	\$1,200.00	F1
7 Adam Slate	29-Jan-92	\$800.00	F1
8 Antoine Smith	29-Jan-92	\$1,100.00	F1
9 Herman Stevenson	29-Jan-92	\$1,400.00	
10 James Thompson	29-Jan-92	\$1,000.00	
11 Jeremy Wiley	29-Jan-92	\$1,700.00	F1
TOTAL:		<u>\$15,300.00</u>	

FOOTNOTES:

F1 Continued to receive normal salary payments for February, March, and April(1992); subsequent to the January 1992 severance payments.

9507019215

WILDER FOR PRESIDENT COMMITTEE
SCHEDULE OF APPARENT NON-QUALIFIED
CAMPAIGN EXPENSES

	VENDOR	DATE PAID	AMOUNT
1	Sarah Callahan	27-Jan-92	\$457.46
2	Grassroots Systems	30-Jan-92	\$500.00
3	Joe Johnson	15-Jan-92	\$1,513.00
4	Steven Rossiter	15-Jan-92	\$400.00
5	Gary Foster	15-Jan-92	\$400.00
6	Jefferson Hotel	17-Jan-92	\$2,500.00
7	Marshall Keys	17-Jan-92	\$1,000.00
8	C & P Telephone	30-Jan-92	\$592.61
9	C & P Telephone	02-Jan-92	\$553.86
10	C & P Telephone	04-Feb-92	\$1,134.05
11	Trsr of Virginia	15-Jan-92	\$2,531.83

Total Apparent Non-Qualified: \$11,582.81

950 / 019-2



RECEIVED
FEDERAL ELECTION
COMMISSION
SECRETARIAT

FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

AUG 17 9 03 AM '95

AK006752

August 16, 1995

MEMORANDUM

TO: THE COMMISSIONERS

THROUGH: JOHN C. SURINA
STAFF DIRECTOR

FROM: ROBERT J. COSTA *RC*
ASSISTANT STAFF DIRECTOR
AUDIT DIVISION

SUBJECT: REPAYMENT OF \$11,515 RECEIVED FROM WILDER FOR
PRESIDENT.

This informational memorandum is to advise you of an \$11,515 check received from Wilder for President. The check represents a repayment for non-qualified campaign expenses and is a partial repayment of the amount recommended in the final audit report.

Attached is a copy of the check, the letter which accompanied the repayment, and the receipt showing delivery to the Department of Treasury.

Should you have any questions regarding the repayment please contact Ray Lisi at 219-3720.

Attachments as stated

050701903

WILDER EXPLORATORY COMMITTEE
P.O. BOX 1515
RICHMOND, VA 23212

1-91

772

68 738/580
1985

PAY TO THE
ORDER OF

August 13, 1995
United States Treasury \$ *11,515.00*
Edward Howard Fink
DOLLARS

NationsBank

NationsBank of Virginia, N.A.
Alexandria, VA

FOR DEPOSIT ONLY

Department of
Environmental Conservation
Ruth M. Jones
⑆056007387⑆ 7922 1933# 0772

9507019203

EPSTEIN BECKER & GREEN, P.C.

ATTORNEYS AT LAW

1227 25TH STREET, N.W.

WASHINGTON, D.C. 20037-11561

(202) 861-0900

TELECOPIER (202) 296-2882

DIRECT LINE

250 PARK AVENUE
NEW YORK, NEW YORK 10177-0077
(212) 351-4500

1875 CENTURY PARK EAST
LOS ANGELES, CALIFORNIA 90067-2501
(310) 556-8861

SIX LANDMARK SQUARE
STAMFORD, CONNECTICUT 06901-37041
(203) 348-3737

ONE RIVERFRONT PLAZA
NEWARK, NEW JERSEY 07102-84011
(201) 642-1900

78 STATE STREET
BOSTON, MASSACHUSETTS 02109
(617) 342-4000

2 EMBARCADERO
SAN FRANCISCO, CALIFORNIA 94111-5904
(415) 398-3500

12750 MERIT DRIVE
DALLAS, TEXAS 75251-12091
(214) 490-3143

116 SOUTH MONROE STREET
TALLAHASSEE, FLORIDA 32301-1830
(904) 881-0596

2400 SOUTH DIXIE HIGHWAY, SUITE 100
MIAMI, FLORIDA 33133
(305) 888-1100

810 KING STREET, SUITE 301
ALEXANDRIA, VIRGINIA 22314-31321
(703) 684-1204

August 15, 1995

P.C. NEW YORK, WASHINGTON, D.C., NEW JERSEY,
CONNECTICUT, VIRGINIA AND TEXAS ONLY

HAND-DELIVERED

Kim Bright-Coleman, Esquire
Associate General Counsel
Office of the General Counsel
Federal Election Commission
999 E Street, N.W., Room 657
Washington, DC 20463

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
AUG 15 11 58 AM '95

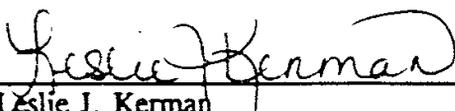
**RE: WILDER FOR PRESIDENT COMMITTEE: REPAYMENT FOR NON-QUALIFIED
CAMPAIGN EXPENSES**

Dear Ms. Bright-Coleman:

Enclosed please find a check from the Wilder for President Committee ("the Committee") made payable to the "United States Treasury" in the amount of Eleven Thousand Five Hundred Fifteen Dollars (\$11,515.00). This constitutes the Committee's required repayment in connection with non-qualified campaign expenses.

Please do not hesitate to contact me at (202) 861-1877 if you have any questions regarding this matter.

Sincerely,



Leslie J. Kerman
General Counsel
Wilder for President Committee

Enclosure (1)

05070192332



FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

August 16, 1995

RECEIPT FROM THE
UNITED STATES DEPARTMENT OF TREASURY
FOR A REPAYMENT OF
1992 PRESIDENTIAL PRIMARY MATCHING FUNDS

Received on August 16, 1995, from the Federal Election Commission (by hand delivery), a check drawn on Nations Bank of Virginia N. A. in the amount of \$11,515. The check represents a repayment from Wilder for President for non-qualified campaign expenses.

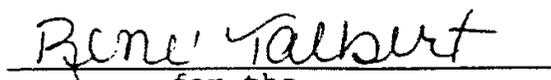
Pursuant to 26 U. S. C. §9038(d), the repayment should be deposited into the Matching Payment Account.

Wilder for President
Amount of Payment: \$11,515

Presented by:

Received by:


for the
Federal Election Commission


for the
United States Treasury

950/0192070