



# THE FEDERAL ELECTION COMMISSION

# RECORD

1325 K Street N.W., Washington, D.C. 20463

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## REPORTS DUE

### FIRST QUARTER REPORT

All Federal candidates and political committees supporting such candidates must file a first quarter report of receipts and expenditures by April 10, 1978, if total contributions received or total expenditures made during the first quarter exceeded \$1,000. In addition, those candidates or committees whose debts incurred or debts extinguished exceeded \$1,000 during the quarter are required to file the quarterly report. If the campaign finance activity of a candidate or committee did not exceed this reporting threshold during the quarter, they must nevertheless file FEC Form 3a (postcard form) or a letter containing the same information as the postcard. (Candidates who have requested a personal reporting waiver need not file any report on April 10. Political committees filing monthly should file their report for the month of March on April 20.)

The report, filed on FEC Form 3 or 6 (with supporting schedules), is due on or before April 10, 1978, and covers the period from January 1, 1978, through March 31, 1978. The report should be filed with the Clerk of the House, the Secretary of the Senate or the Federal Election Commission, as appropriate. A packet of notices containing additional information, as well as forms, has been sent to all registered candidates and committees. Questions about the notices or requests for forms should be addressed to the Office of Public Communications, Federal Election Commission, 1325 K Street, N.W., Washington, D.C. 20463; or telephone 202/523-4068 -- toll free 800/424-9530.

### NEW FORMS

The Commission recently completed revisions of FEC Form 3 (Report of Receipts and Expenditures) and its supporting schedules, and FEC Form 7 (Report of Communication Costs by Corporations and Membership Organizations). The forms have been revised to clarify and simplify reporting obligations. Instructions on the back of the forms have also been revised.

The new Form 3, which should be used by candidates and committees to report campaign finance activity, can be identified by the words in the upper left hand corner of the form which state: **FEC Form 3 REVISED, January 1978**. Copies of the new Form 3 are included in the packet for the April 10 quarterly report mailed to all registered candidates and committees.

The new Form 7 will be mailed to corporations and membership organizations (including labor organizations) in time for the April 20 monthly report. This form should be filed by corporations or membership organizations which spend more than \$2,000 per election for communications which expressly advocate the election or defeat of a clearly identified candidate (2 U.S.C. §431(f)(4)(C); 11 CFR 100.7(b)(5)).

Questions on the new forms or requests for additional copies should be addressed to the Office of Public Communications (see above).

### OFFICE ACCOUNT REPORT

The Federal Election Campaign Act, as amended, and the Commission's regulations require the reporting of office account receipts and disbursements. (2 U.S.C. §439a; 11 CFR 113.) (For the definition of an office account, see the *Record*, October 1977, p. 1.) All Federal officeholders who maintain office accounts, and all State officeholders who are candidates for Federal office and who maintain office accounts must file a report of receipts and disbursements for their office accounts by April 15, 1978. The report should cover the period from October 1, 1977, through March 31, 1978, for Federal officeholders; and, in the case of State officeholders, from October 1, 1977 (or the date of candidacy, whichever is later) through March 31, 1978. The report should be filed using FEC Form 8 and supporting schedules, as necessary. It should be filed with the Secretary of the Senate, the Clerk of the House or the Federal Election Commission, as appropriate. Any questions about the reporting requirement or requests for forms should be addressed to the Office of Public Communications (see above).

# OPINIONS

## PENDING ADVISORY OPINION REQUESTS

The following chart lists pending Advisory Opinion Requests (AOR's), with a brief description of the subject matter, the date the requests were made public and the number of pages of each request. The full text of each AOR is available to the public in the Commission's Office of Public Records.

AOR	Subject	Date Made Public	Number of Pages
1978-10	Expenditures by State party committee.	2/16/78	1
1978-11	Application of honoraria provisions to Supreme Court Justice.	2/16/78	3
1978-12	Formation of multi-candidate committee.	2/28/78	2
1978-13	Corporate payment of travel-related expenses.	3/1/78	3
1978-14	Application of honorarium provisions to Federal judge.	3/1/78	3
1978-15	Candidate's participation in charity drive.	3/8/78	2
1978-16	Reporting of payroll deduction plan.	3/8/78	3
1978-17	Solicitations at trade association convention.	3/8/78	3
1978-18	Distribution of Chamber of Commerce publication.	3/8/78	2

## ADVISORY OPINIONS: SUMMARIES

Designated as AO's, Advisory Opinions discuss the application of the Act or Commission's regulations to specific factual situations. Any qualified person requesting an Advisory Opinion who in good faith acts in accordance with the opinion will not be subject to any sanction under the Act. The opinion may also be relied on by any other

person involved in a specific transaction which is indistinguishable in all material aspects from the activity discussed in the Advisory Opinion.

### AO 1977-27: Congressional Intern Program

Congressman L.A. "Skip" Bafalis may sponsor an intern program for high school students from his district without incurring any reporting obligations under the Act or regulations (2 U.S.C. §439a; 11 CFR 113.4). The donations and disbursements relating to the intern program (to cover travel and incidental expenses of the participants) are not made for the purpose of supporting the Congressman's activities as a holder of Federal office. None of the funds are under the Congressman's control at any time. The Tenth Congressional District Intern Program, a corporation organized to manage the program, has achieved tax exempt status under Section 501(c)(3) of the Internal Revenue Code.

The Commission regards AO 1977-27 as superceding those parts of AO 1977-13 (summarized in the Record, June 1977, p. 2) which deal with the application of the 2 U.S.C. §439a and 11 CFR 113 to the intern program described in that advisory opinion. (Length: 3 pages)

### AO 1977-57: Termination of 1972 Committee

The 1972 Campaign Liquidation Trust (the Trust) may not terminate its reporting obligations under the Act. Because the Trust has assumed the debts and obligations of former Federal campaign committees, and because these debts and obligations have not been extinguished, the Trust must continue to report (2 U.S.C. §434(b)(12)).

However, some of the debts and obligations currently reported by the Trust are claims for legal fees made against the entities which established the Trust. The Trust may disallow these claims, in which case the Trust need not report them as debts or obligations. When a previously reported claim is disallowed, however, the Trust must file an amended report to reflect that the claim is no longer a debt or obligation. The Trust's reporting obligation may be terminated once all debts and obligations have been extinguished. (Length: 2 pages)

### AO 1977-58: Transfer of Candidate's Personal Funds

Personal funds transferred by 1974 candidate Edward P. Beard to his principal campaign committee may not be retroactively designated as a loan to the committee. Since the funds were originally reported by the committee as a transfer-in (contribution), no debt or obligation was disclosed. The committee, in fact, completed its activities following the 1974 elections with no reported debts or

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obligations. Subsequent contributions received and expenditures made by the committee were with respect to Mr. Beard's candidacy in 1976. To redesignate a transfer from 1974 as a debt or obligation of the committee would not be in accordance with the Act (2 U.S.C. §434(b)(12)), which requires debts to be disclosed in a timely manner and to be continuously reported until they are extinguished. (Length: 2 pages)

#### **AO 1977-61: Joint Fundraising**

The Colorado State Democratic Central Committee (CDC) may engage in joint fundraising with the People for Haskell committee (PH) by means of a fundraising dinner sponsored by a third political committee authorized by both CDC and PH. This political committee, Dinner with the Vice President Committee (DVPC), may conduct the fundraising event, provided certain additional requirements detailed by the Commission are met, including:

- Written authorization of DVPC must be made by CDC and PH.
- All committees must comply with the Act's provisions: recordkeeping, registration, reporting and contribution limitations, among others.
- A procedure must be established whereby contributors may designate their contributions to one (or the other) of the two committees. All other contributions will be equally divided between PH and CDC, as agreed prior to the event.
- Solicitations must inform contributors of the procedures for making contributions to the committee, including a description of the method for directing contributions to one of the other two committees.
- Expenses must be shared in the same ratio as the allocation of contributions received. If not, the committee paying a disproportionate share of expenses is considered to have made an in-kind contribution to the other committee.

The Commission also provided detailed guidance to the three committees on procedures for reporting the contributions received, as well as for reporting the transfer of funds from DVPC to CDC and PH. (Length: 4 pages)

#### **AO 1977-63: Use of Excess Campaign Funds**

Congressman Paul G. Rogers may use excess campaign funds from a 1968 congressional campaign for his campaign for re-election in 1978. The 1968 funds, if used in the 1978 campaign, must be included in the cash-on-hand of Congressman Rogers' 1978 principal campaign committee. The committee must also identify any individual contributor of more than \$100 on a separate Schedule A, specifically designated for this purpose. These individuals are not considered to have made a contribution for limitation purposes under the Act, but they must be identified for disclosure purposes.

The excess campaign funds may also be used for other purposes described in the Act and regulations at 2 U.S.C. §439a and 11 CFR 113.2, respectively. (Length: 2 pages)

#### **AO 1977-65: Transfer of Funds from Connected Organization**

The political committee Americans for Democratic Action-Progressive Victory Fund (ADA-PVF) may not accept contributions from its connected organization, Americans for Democratic Action-Michigan Chapter (ADA-MC). Because ADA-MC derives a portion of its funds from the sale of advertising or fundraising tickets to corporations and labor organizations, contributions by ADA-MC to ADA-PVF would constitute prohibited indirect corporate or labor contributions to a political committee. As ADA-PVF acknowledged that it had already received such contributions from ADA-MC, the Commission required that the monies be returned. ADA-PVF must also give the Commission written notice when the funds have been returned. (Length: 2 pages)

#### **AO 1978-1: Retirement of Past Campaign Debts**

Contributions to the Democratic National Committee (DNC) to retire debts incurred in connection with elections held prior to January 1, 1975, are not subject to the contribution limits of the Act. The conditions for acceptance of such unlimited contributions set forth in the opinion were originally stated in several 1975 and 1976 advisory opinions and also codified in the Commission's regulations at 11 CFR 110.1(g). The contributions, however, must be clearly designated and used only for that purpose. Any solicitation for such contributions must contain a clear notice that the contributions will be used to retire a pre-1975 debt.

The DNC must also maintain a separate account to receive such contributions and to make expenditures to retire the pre-1975 debts. Transfers between this account and other DNC accounts are prohibited. The DNC must keep records for and report all contributions and expenditures in connection with the retirement of the pre-1975 debts in accordance with the currently applicable provisions of the Act and regulations. This includes reporting the outstanding obligations on a separately designated Schedule C and, when itemization is required, reporting each contribution designated for the pre-1975 debt on separately designated Schedule A's. (Length: 4 pages)

#### **AO 1978-2: Expenditure by Political Campaign Committee**

The principal campaign committee of Congressman Butler Derrick may pay the expenses incurred by the Congressman and his wife when attending the Democratic National Committee's "Southern Salute to Jimmy Carter." In past opinions, the Commission has stated that it leaves to the candidates (or their committees) the discretion of deciding which expenditures will best serve their candidacies. The expenditure must, of course, be reported in accordance with the applicable provisions of the Act and regulations. (Length: 2 pages)

### AO 1978-3: Reimbursement by Principal Campaign Committee

The principal campaign committee of Congressman Gillespie V. Montgomery may reimburse him for the purchase of Christmas gifts in 1977. The Congressman considers the cost of the gifts to be legitimate campaign expenditures. The principal campaign committees must report the reimbursement as an expenditure to the person or business from whom the Congressman purchased the Christmas gifts. The report must also note that the actual disbursement of funds was made to the Congressman. Mr. Montgomery must provide the committee with a receipted bill from the vendor in accordance with 2 U.S.C. §432(d) and 11 CFR 102.9(c). The Commission expressed no opinion as to the applicability of House Rules to the proposed reimbursement, because these Rules are outside the Commission's jurisdiction. (Length: 2 pages)

### AO 1978-4: Commemorative Committee

The John Rhodes Commemorative Committee is not required to register and report as a political committee for a commemorative dinner held to honor Congressman John Rhodes for the following reasons:

- The dinner is a nonprofit, nonpartisan event; and
- The event is not for the purpose of influencing Mr. Rhodes' nomination or election to Federal office.

The dinner is considered a bona fide testimonial event provided that no political contributions are solicited, made or received in conjunction with the event and that no communication is made to the attendees as a group which advocates the election of Mr. Rhodes or the defeat of any other candidate.

Chairman Thomas Harris and Commissioner Neil Staebler dissented from the majority opinion's conclusions. (Length: 3 pages, including the dissenting opinion)

## THE LAW IN THE COURTS

### NEW RECORD POLICY ON LITIGATION

Effective this issue, the *Record* initiates a new policy on reporting litigation. A monthly article, entitled *Litigation Status Information*, will list each new suit together with the date it was filed, the Court involved, the Docket number and a brief description of the major issue(s) involved in the case. In addition, the *Record* will summarize any major Court decisions concerning the Act and the FEC.

The *Record* will no longer cover each argument or the different stages of litigation. Persons seeking additional information on a particular case should contact the Court where the suit is filed, or the Commission.

## LITIGATION STATUS INFORMATION

**National Conservative Political Action Committee et al. v. FEC et al.** U.S. District Court for the District of Columbia, Docket No. 78-0270, February 15, 1978.

Plaintiff seeks declaratory and injunctive relief against Advisory Opinion 1978-1 and/or 11 CFR 110.1(g) which permits the Democratic National Committee to accept unlimited contributions to retire pre-1975 campaign debts.

**FEC v. AFL-CIO.** U.S. District Court for the District of Columbia, Docket No. 77-2147, December 16, 1977.

The Commission seeks to enjoin the AFL-CIO from transferring monies from the union's general treasury to its political action committee.

**FEC v. National Right to Work Committee et al.** U.S. District Court for the District of Columbia, Docket No. 77-2175, December 21, 1977.

The Commission alleges that the National Right to Work Committee solicited members of the general public in violation of 2 U.S.C. §441b.

**FEC v. J. Ray McDermott et al.** U.S. District Court for the Eastern District of Louisiana, Docket No. 77-3801, December 21, 1977.

The Commission alleges that the McDermott Corporation of New Orleans, Louisiana and certain of its officers made illegal contributions in connection with Federal elections.

## COMPLIANCE

### NONFILER PROCEDURES

The Commission recently adopted and began to implement procedures to monitor compliance with the filing requirements of the Federal Election Campaign Act. These new procedures supplement and expand previous procedures used by the Commission in 1976 and 1977. The procedures are focused on two major areas: registration requirements and reporting obligations. Specifically, the Commission will monitor any:

1. Failure to register as a candidate;
2. Failure to designate a principal campaign committee;
3. Failure to designate an authorized committee;
4. Failure to file a statement of organization;
5. Failure to register as a political committee;
6. Failure to file required reports of receipts and expenditures.

A detailed system of notices was established to notify candidates and committees of their obligations when they fail to file a required statement or report. If, following receipt of these notices, the candidate or committee involved continues to not file the required information, the case is referred to the Office of General Counsel for treatment as an enforcement action.

### FEC RELEASES NAME OF NONFILER

On February 11, 1978, the Commission released the name of the Federal candidate in New York's 21st Congressional District who failed to file the required 10-day pre-election report of campaign finances for the February 14 special election. Under Commission procedures, three notices are sent to candidates and committees reminding them of their reporting obligations and urging compliance. If a candidate or committee does not file the required report(s) following the receipt of these notices, the name of that "nonfiler" is made public, as required by law.

### SUITS AGAINST NONFILERS

In connection with the new policy of the *Record* regarding lawsuits (See **THE LAW IN THE COURTS**, p. 4), the initial filing of nonfiler suits against candidates and committees will be listed in the *Litigation Status Information* article under **THE LAW IN THE COURTS**. Nonfiler suits filed by the Commission will no longer be summarized in this section of the *Record*.

## 800 LINE

The Public Communications Office of the Federal Election Commission receives numerous inquiries from the public on the toll-free line (800/424-9530). The following explanation of some specific reporting requirements is presented in response to several frequently asked questions.

### CORPORATE CONTRIBUTIONS

The Federal Election Campaign Act prohibits contributions by corporations "in connection with" Federal elections. The term "contribution" is defined in 11 CFR 114.1 as:

"... any direct or indirect payment, distribution, loan, advance, deposit, or gift of money, or any services or anything of value. . . ."

The term "corporation" includes corporations organized by authority of any law of Congress (e.g., COMSAT, CONRAIL), or organized under State law. The latter group includes professional organizations (e.g., doctors, partnerships) which are incorporated under State law.

Candidates and committees which receive a contribution from a corporation should return it immediately without depositing the contribution in the campaign depository.

If a corporate contribution is inadvertently deposited, it should be returned immediately upon discovery. The next regularly scheduled report should show this refund and contain a brief explanatory note as to why the contribution was returned.

If a candidate or committee is unsure whether a contribution it has received is from a corporation (for example, the check bears the name of a business, but there is no indication as to whether the business is incorporated), the contribution should be treated according to §103.3 of the Commission's regulations. The following excerpt from the *Campaign Guide for Congressional Candidates* (p. 10) summarizes this provision:

A contribution which appears to be illegal must, within 10 days, either be:

1. Returned to the contributor, or
2. Deposited in the campaign depository. In this case, the committee must report the contribution, keep records noting the basis for concern, and try to determine the legality of the contribution. If, within a reasonable time, the treasurer cannot determine whether or not the contribution is legal, he or she must return it and report the refund on the next scheduled report.

A corporation may, of course, establish a separate segregated fund consisting of voluntary contributions from its stockholders, administrative or executive personnel, or other employees. This fund may register as a political committee under the Act and contribute lawfully to Federal candidates.

Candidates and committees are reminded that, in addition to corporations, labor organizations and national banks are prohibited from making contributions or expenditures "in connection with" Federal elections. These organizations, however, may also establish separate segregated funds for making contributions to candidates for Federal office.

## FEDERAL REGISTER NOTICES

FEC documents of general applicability are published in the *Federal Register*. The following list identifies all FEC documents appearing in the *Federal Register* between February 23, 1978, and March 20, 1978.

Notice	Title	Federal Register Publication Date	Citation
1978-2	Notice of Annual Comprehensive Review of the Clearinghouse Advisory Panel	3/7/78	43 FR 9350

## STATISTICS

### 1977 DATA ON POLITICAL PARTY COMMITTEES

On March 5, 1978, the Commission released preliminary 1977 campaign finance figures for political party committees. The figures were complete as of September 30, 1977, for committees filing quarterly reports, and as of November 30, 1977, for committees filing monthly reports. Highlights of the statistics are as follows:

- The 34 national and congressional party committees raised \$24.1 million during this period and spent \$22.9 million, including almost \$500,000 in contributions to Federal candidates.
- The 187 State and local party committees registered and reporting with the Commission reported receipts of \$8.2 million and expenditures of \$8.0 million. The expenditure figure included contributions to Federal candidates totaling \$63,000.
- National and congressional party committees spent \$30,000 in other expenditures relating to Federal candidates, while such expenditures by State and local party committees totaled \$23,000.
- Cash-on-hand for the 34 national and congressional party committees, as taken from the last report of the period covered, totaled about \$9 million (not counting any offsetting debts or obligations due).

### UPDATE OF MULTICANDIDATE COMMITTEE INDEX

The Commission publishes each month an update to the **Multicandidate Committee Index**. For a summary of the contents of the Index, see the **Record**, February 1978, p. 4. The update is available on the last day of each month. Copies of the Index, the current update, or any past updates are available through the Office of Public Records, Federal Election Commission, 1325 K Street, N.W., Washington, D.C. 20463 -- telephone 202/523-4181 or toll-free 800/424-9530. The purchase price is 10 cents per page, payable in advance.

### INDEX OF OFFICE ACCOUNT REPORTS

The Commission recently released an **Index of Office Account Reports** compiled from office account reports filed on October 15, 1977. The report summarizes the activity of the 140 filers, including 26 Senators, 112 Representatives and 2 other filers. The Commission's regulations define an office account in part as:

"... an account established for the purpose of supporting the activities of a Federal or State officeholder..." 11 CFR 113.1(b)

The 12-page Index is available from the Office of Public Records at the Commission, for a purchase price of \$1.20, payable in advance (see above).

## PUBLICATIONS

### FREEDOM OF INFORMATION ACT: REPORT OF FEC

On March 1, 1978, the Commission transmitted to Congress a report on its 1977 activities under the Freedom of Information Act (FOIA). The report emphasized the Commission's basic policy of regularly making as much information available as possible, "... thereby not requiring interested parties to formally submit requests for information under FOIA procedures." The only exception to this policy are pending compliance, audit and personnel matters. Under the Act, the Commission must maintain the confidentiality of all compliance and audit matters until a case is completed, at which time it is routinely put on the public record.

During 1977, only 22 formal requests for information were made under the FOIA. The Commission granted 11 requests, denied in part four other requests, and denied seven others altogether.

### FEC PUBLIC APPEARANCES

In keeping with its objective of making information available to the public, the Federal Election Commission regularly accepts invitations for its representatives to address public gatherings on the subject of campaign finance laws and the Commission itself. (For a summary of the Commission's policy on accepting invitations, see the **Record**, July 1977, p. 6.) This regular column lists scheduled Commission appearances, detailing the name of the sponsoring organization, location of the event and the Commission's representative.

- 4/13 National Association of Business Political Action Committees  
San Francisco, California  
Jan Baran, Executive Assistant to Vice Chairman Joan Aikens
- 4/28-29 Ohio Council for the Social Studies  
Columbus, Ohio  
Commissioner Neil Staebler

# INFORMATION

## PARTY COORDINATED EXPENDITURE LIMITS -- 1978

Under the Federal Election Campaign Act, as amended, and the FEC regulations, there are special limits on expenditures made by political parties on behalf of candidates in the general election (2 U.S.C. §441a(d), 11 CFR 110.7). These special party expenditures count neither as contributions to the candidate nor as expenditures by the candidate or the candidate's authorized committees. The expenditures must, however, be reported by the party committee on Schedule F, FEC Form 3, revised January 1978.

National political party committees have separate expenditure limits for Senate and House candidates in the general election.

State political party committees are entitled to separate expenditure limits for Senate and House general election candidates in their State. Within a State, all expenditures made on behalf of one candidate by the State party committee or any subordinate party committee (e.g., county, district, local) are subject to one expenditure limit.

The formulas for the party spending limits in 1978 are based on State voting age population estimates (as of July 1, 1977) from the Department of Commerce, and the Consumer Price Index increase certified by the Secretary of Labor. They are calculated as follows:

### Senatorial:

State Voting Age Population (VAP) x \$0.02, plus the 1978 increase in the Consumer Price Index (CPI) of 22.9 percent; or \$24,580.00, whichever is greater. (See chart below.)

### Congressional:

- 1) \$12,290.00, for House candidates in States with more than one district (and candidates for Delegate from the District of Columbia, Guam and the Virgin Islands; or for Resident Commissioner from Puerto Rico); or
- 2) The Senate limit for the State, for House candidates in States with only one district. (See chart below.)

## PARTY SPENDING LIMITS FOR SENATE CANDIDATES

The Commission has compiled the following chart for 1978 limits on party spending for Senate candidates in the general election. In the chart, an asterisk (\*) indicates those States having only one Representative. In these instances, the Senate limit applies for these candidates instead of the House limitation. This exception does not apply to candidates for Delegate (District of Columbia, Guam, Virgin Islands) or Resident Commissioner (Puerto Rico).

State	VAP (in thousands)	1978 Party Spending Limitations
Alabama	2,543	\$62,506.94
Alaska*	258	24,580.00
Arizona	1,562	38,393.96
Arkansas	1,494	36,722.52
California	15,627	384,111.66
Colorado	1,828	44,932.24
Connecticut	2,238	55,010.04
Delaware*	407	24,580.00
Florida	6,219	152,863.02
Georgia	3,450	84,801.00
Hawaii	615	24,580.00
Idaho	574	24,580.00
Illinois	7,873	193,518.34
Indiana	3,690	90,700.20
Iowa	2,025	49,774.50
Kansas	1,664	40,901.12
Kentucky	2,402	59,041.16
Louisiana	2,609	64,129.22
Maine	756	24,580.00
Maryland	2,921	71,798.18
Massachusetts	4,166	102,400.28
Michigan	6,284	154,460.72
Minnesota	2,765	67,963.70
Mississippi	1,575	38,713.50
Missouri	3,417	83,989.86
Montana	523	24,580.00
Nebraska	1,095	26,915.10
Nevada*	439	24,580.00
New Hampshire	594	24,580.00
New Jersey	5,224	128,405.92
New Mexico	783	24,580.00
New York	12,879	316,565.82
North Carolina	3,864	94,977.12
North Dakota*	450	24,580.00
Ohio	7,484	183,956.72
Oklahoma	1,994	49,012.52
Oregon	1,695	41,663.10
Pennsylvania	8,508	209,126.64
Rhode Island	673	24,580.00
South Carolina	1,953	48,004.74
South Dakota	475	24,580.00
Tennessee	3,028	74,428.24
Texas	8,773	215,640.34
Utah	797	24,580.00
Vermont*	336	24,580.00
Virginia	3,631	89,249.98
Washington	2,589	63,637.62
West Virginia	1,313	32,273.54
Wisconsin	3,244	79,737.52
Wyoming	278	24,580.00
District of Columbia	505	12,290.00
Guam	49	12,290.00
Puerto Rico	2,010	12,290.00
Virgin Islands	59	12,290.00

