

RECORD

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COMMISSIONERS

FEC ELECTS NEW OFFICERS

On December 18, 1984, the Federal Election Commission unanimously elected John Warren McGarry as Chairman and Joan D. Aikens as Vice Chairman to serve one-year terms commencing January 1, 1985. Mr. McGarry succeeded Commissioner Lee Ann Elliott in the Chairmanship. Mrs. Aikens succeeded Commissioner Thomas E. Harris as Vice Chairman.

Mr. McGarry, a Democrat, was first appointed to the Commission in 1978 by President Carter. In 1983, he was named to serve a second term, which is due to expire on April 30, 1989. He served as FEC Chairman in 1981. Before serving on the Commission, Mr. McGarry served as Special Counsel on Elections to the Committee on House Administration of the U.S. Congress from 1973 to 1978. Prior to that, he combined private law practice with service as Chief Counsel for the Special Committee to Investigate Campaign Expenditures of the U.S. House of Representatives. (By special resolution, Congress recreated this Committee every two years, through 1972, to oversee House elections.) From 1959 through 1962, he was an Assistant Attorney General of Massachusetts.

Mr. McGarry graduated cum laude from Holy Cross College in Massachusetts in 1952, did graduate work at Boston University and earned a Juris Doctor degree in 1956 from Georgetown Law Center.

Mrs. Aikens, a Republican, is one of the original members of the Commission. She was first appointed to the Commission in March 1975, and, upon the FEC's reconstitution in May 1976, she received a five-year appointment. In 1983, President Reagan reappointed Mrs. Aikens, this time for a six-year term. She served as FEC Chairman between May 1978 and May 1979.

Before serving on the Commission, Mrs. Aikens was Vice President of Lew Hodges/Communications, a public relations firm located in Valley Forge, Pennsylvania. From 1972 until 1974, she was president of the Pennsylvania Council of Republican Women and served on the board of

directors of the National Federation of Republican Women. She served as Alternate Delegate-at-Large to the 1972 Republican National Convention and, at the time of her appointment to the Commission, she was a member of the Pennsylvania Republican State Committee. She has also been active in a variety of other volunteer organizations.

A native of Delaware County, Pennsylvania, Mrs. Aikens received her B.A. and honorary Doctor of Law degree from Ursinus College, Collegeville, Pennsylvania.

REPORTS

1985 REPORTING SCHEDULE

All political committees must file a year-end report due January 31, 1985. Committees must meet other reporting requirements, as well, depending on what type of committee they are. The accompanying charts list filing dates for reports required during 1985. *continued*

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Congressional Candidates

All committees authorized by Congressional candidates must report semiannually: July 31, 1985, and January 31, 1986. Semiannual filers include the authorized committees of candidates retiring campaign debts or running in future elections.

Congressional Candidates Active in Special Elections

All committees authorized by candidates running for Congress in special elections held in 1985 must file pre- and post-election and semiannual reports during 1985.

Authorized Presidential Filers

Authorized Presidential committees must report on either a monthly or a quarterly basis during 1985. The FEC's Reports Analysis Division requests that Presidential committees which change their reporting schedule during 1985 notify the Commission of their intention in writing.

Unauthorized Committees

All unauthorized committees (i.e., committees not authorized by candidates) are required to file on either a semiannual or monthly basis in 1985. Unauthorized committees that wish to change their reporting schedule (for example, from monthly to semiannual reports) must submit a letter with the report filed prior to the intended change, indicating that they will change their schedule starting with the next report. A committee may not change its filing frequency more than once a year. 11 CFR 104.5(c).

Forms and Information

During 1985, reporting forms and additional information will be sent to all registered committees. Questions and 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 call 202/523-4068 or toll free 800/424-9530.

YEAR-END REPORT 1984

Report	Period Covered	Filing Date*
Year-End	11/27-12/31	1/31/85

MONTHLY REPORTS 1985

Report	Period Covered	Filing Date*
February	1/1 - 1/31	2/20/85
March	2/1 - 2/28	3/20/85
April	3/1 - 3/31	4/20/85
May	4/1 - 4/30	5/20/85
June	5/1 - 5/31	6/20/85
July	6/1 - 6/30	7/20/85
August	7/1 - 7/31	8/20/85
September	8/1 - 8/31	9/20/85
October	9/1 - 9/30	10/20/85
November	10/1 - 10/31	11/20/85
December	11/1 - 11/30	12/20/85
Year-End	12/1 - 12/31	1/31/86

SEMIANNUAL REPORTS

Report	Period Covered	Filing Date*
First	1/1 - 6/30	7/31/85
Second	7/1 - 12/31	1/31/86

QUARTERLY REPORTS

Report	Period Covered	Filing Date*
First Q	1/1 - 3/31	4/15/85
Second Q	4/1 - 6/30	7/15/85
Third Q	7/1 - 9/30	10/15/85
Fourth Q (Year-End)	10/1 - 12/31	1/31/86

*The filing date is considered the mailing date if the report is sent by registered or certified mail. 11 CFR 104.5(e).

The Record is published by the Federal Election Commission, 1325 K Street, N.W., Washington, D.C. 20463. Commissioners are: John Warren McGarry, Chairman; Joan D. Aikens, Vice Chairman; Lee Ann Elliott; Danny Lee McDonald; Thomas E. Harris; Frank P. Reiche; JoAnne Coe, Secretary of the Senate, Ex Officio; Benjamin J. Guthrie, Clerk of the House of Representatives, Ex Officio. For more information, call 202/523-4068 or toll-free 800/424-9530.

**COMMUNICATION FILERS:
CORRECTION**

The reporting chart in the November Record erroneously indicated that connected organizations may have to file post-election reports on their internal communications. In fact, the 30-day post-election report is not required. However, a pre-election report was required if the organization's aggregate costs for internal communications which expressly advocated the election or defeat of a clearly identified candidate in the 1984 general election exceeded \$2,000. 11 CFR 104.6 and 104.5 (a)(1)(i). Furthermore, under Commission regulations, an organization must file quarterly reports beginning with the first reporting period during which aggregate costs exceed \$2,000 and for each quarter thereafter in which it makes additional disbursements in connection with the same election. 11 CFR 104.6(b). Thus, if a connected organization which filed the pre-election report made additional disbursements for internal partisan communications (involving express advocacy) after October 17, 1984, it should file an end-of-the-year report, due January 31, 1985.

OPINIONS**ADVISORY OPINION REQUESTS**

The following chart lists recent requests for advisory opinions (AORs). The full text of each AOR is available to the public in the Commission's Office of Public Records.

AOR Subject

- 1984-60 Debts retired by candidate's sale of assets to family member. (Date made public: November 21, 1984; Length: 2 pages)
- 1984-61 Trade association's use of single authorization form to request multiple-year solicitation approvals. (Date made public: December 6, 1984; Length: 2 pages)

**ALTERNATE DISPOSITION OF
ADVISORY OPINION REQUEST**

-- **AOR 1984-40** (Reporting of expenditures for t.v. ads.) On December 7, 1984, the General Counsel sent the Democratic Congressional Campaign Committee (DCCC) a letter stating that the Commission concluded that the DCCC's advisory opinion request did not meet the requirements of the Act. 2 U.S.C. §437f. The request did not "set forth a specific transaction or activity that [DCCC] plans to undertake or is presently undertaking and intends to undertake in the future." 11 CFR 112.1(b).

**AO 1984-16: Single Contribution Limit for State
Convention and Primary Election**

A single contribution limit applied to contributions received by Jim Shannon, Senate candidate, with respect to the state nominating convention held by the Massachusetts Democratic Party and the primary election. The Party's state convention constituted a step in the primary election process, rather than a separate election with a separate contribution limit, because the convention did not have the authority to nominate a candidate for the U.S. Senate; the party could only endorse candidates for nomination to the Senate seat. While candidates who won the Party's endorsement at the convention (i.e., at least 15 percent of the delegates' votes) automatically had their names placed on the ballot for the primary election, they still had to campaign in the primary. Moreover, even if a candidate did not win the convention's endorsement, he or she could wage a write-in campaign to obtain access to the primary election ballot.

The Commission distinguished its decision in this opinion from its decisions in AOs 1981-29 and 1978-25. In those opinions, state party conventions in Connecticut and Utah had the authority to nominate candidates for federal office. If candidates were endorsed by a specified percentage of votes cast by convention delegates, they became the party nominees in the general election, and no primary election was held. (Date made public: May 11, 1984; Length: 4 pages)

**AO 1984-33: Fundraiser for Trade Association
PAC Paid by Allied Members**

Allied members of the National Restaurant Association (NRA), a trade association, may not underwrite costs of a PAC fundraising event NRA plans to hold in conjunction with its annual trade show. Although a trade association's corporate members may finance such fundraising costs (AOs 1980-59 and 1983-36), NRA's allied members are not sufficiently related to NRA to qualify as the association's "members." 11 CFR 114.1(e). More-

continued

over, the authorization form NRA proposes to print on tickets for the fundraiser does not comply with FEC rules. See 11 CFR 114.8(c) and 114.8(d)(3).

NRA's Allied Members May Not Underwrite Fundraiser

Commission Regulations define a trade association's members as "all persons who are currently satisfying the requirements for membership" in the organization. 11 CFR 114.1(e). The Supreme Court has determined that "members" include individuals who have "some relatively enduring and independently significant financial organizational attachment" to the membership organization. (See *FEC v. National Right to Work Committee*, 459 U.S. at 204, 103 S.Ct. at 557). In determining if a class of members is sufficiently related to the organization to qualify as a "member," the Commission has considered whether the members have: 1) some right to govern the membership organization, for example, by exercising voting rights and 2) an obligation to help sustain the organization through regular dues payments. Although NRA's allied members pay dues, these members do not have the right to govern the organization. They may not vote for NRA's officers and directors; nor are they eligible for election to these positions. Accordingly, NRA's allied members are not considered "members" eligible to underwrite the costs of NRA's fundraiser.

Authorization Form Insufficient

Under FEC Regulations, before soliciting PAC contributions from the solicitable personnel of member corporations, a trade association must first obtain written approval for the solicitation from the corporate member. The request for approval may be addressed to the designated representative of the member corporation with whom the trade association regularly corresponds. 11 CFR 114.8(e). NRA's proposed authorization form, to be printed on tickets for its fundraiser, does not meet these requirements. The language of the form suggests that NRA seeks approval for its solicitations from individuals rather than from designated representatives of member corporations. Nor does the form explain that only the person authorized by the member corporation may grant the approval. Furthermore, the procedure for billing pledged contributions does not conform to the prior authorization procedures. See AO 1980-15.

The Commission noted that any contributions solicited by NRA or NRA-PAC at the fundraising event must also comply with the notification requirements and other relevant Commission Regulations. 11 CFR 102.5(a)(2) and 114.5(a). Moreover, all contributions to NRA-PAC are subject to the limits and prohibitions of the election law.

2 U.S.C. §441a, 441b, 441c, 441e and 441f. (Date issued: November 30, 1984; Length: 5 pages)

AO 1984-52: Candidate's Refund of Illegal Contributions

Representative Marty Russo's principal campaign committee for his 1982 reelection campaign (the Russo Committee) must refund illegal contributions to the Board of Trade Clearing Corporation (the corporation), which had contributed to the Russo committee in the name of corporate employees between December 1981 and September 1982. The Russo Committee must make the refunds (amounting to \$7,750) immediately upon receiving the FEC's advisory opinion and disclose them on its next required report.

Representative Russo first learned of the illegality of the contributions in September 1984, when findings of a grand jury investigation into the corporation's activities were disclosed in the *Chicago Sun Times*. The findings revealed that, although the corporation's employees had ostensibly contributed to federal candidates from their personal funds, the corporation had actually funded their contributions through subsequent employee bonuses. (The case was concluded after the corporation entered a plea of guilty to criminal violations of the Act's ban on corporate contributions. See 2 U.S.C. §541b.)

As a general rule, recipients of unlawful contributions must refund the contributions upon discovering their illegality. In some cases an exception to this rule may be allowed, but none of the circumstances in this case justify such an exception.

Since the corporation admitted making the contributions to federal candidates through bonuses to employees, the Commission concluded that the Committee should make the refunds to the corporation rather than to the employees. Commissioner Joan D. Aikens filed a dissent. (Date issued: November 30, 1984; Length: 5 pages, including dissent)

AO 1984-53: Real Estate Lessors Considered Federal Contractors

Members of the National Association of Realtors (the Association) who, as individuals, lease real property to federal agencies are considered federal contractors under the election law. As such, they may not make contributions to the Association's separate segregated fund, the Realtors Political Action Committee (RPAC), or to other federal committees or candidates.

The election law specifically prohibits federal contractors from making contributions to any political committee, political party or candidate for public office. 2 U.S.C. §441c. The law defines federal contractors as persons who enter into a

contract with a federal agency for the purpose of rendering personal services; furnishing material, supplies or equipment; or selling land or buildings. 11 CFR 115.1(a)(1). Under this definition, an Association member who leases real property to federal agencies would qualify as a federal contractor because the association member would, in effect, be selling an interest in the property to the agency. Moreover, since many leases contain explicit contractual provisions regarding building services, Association members who leased property would also be rendering services to federal agencies. (Date issued: November 13, 1984; Length: 3 pages)

AO 1984-54: Reporting/Contribution Limits for Congressional Candidate Nominated and Elected in Louisiana Primary

Under Louisiana election law, a primary election results in the final selection of the officeholder if the candidate receives a majority of the votes or if the candidate is unopposed. Representative Bob Livingston did not seek election in Louisiana's general election because he received a majority of the votes cast in the primary for the House seat in Louisiana's First Congressional District. In fact, Louisiana did not hold a general election for any Congressional candidate in 1984. Nevertheless, the Commission considered Representative Livingston a candidate for the general election because the general election date in November is prescribed by federal statute. 2 U.S.C. §§1 and 7. Accordingly, his principal campaign committee, Friends of Bob Livingston, had to file pre- and post-general election reports, in addition to a year-end report.

As a general election candidate under federal law, Rep. Livingston could have accepted contributions that counted toward a separate limit for the general election. 11 CFR 110.1(j)(2). The Commission distinguished this decision from that reached in AO 1982-49. In that opinion, the Commission decided that a separate contribution limit was not available for a primary that was not, in fact, held; primaries are not mandated by federal law.

In response to Rep. Livingston's request, the Commission also noted that it would consider treating this subject in a future rulemaking. Commissioners Thomas E. Harris and Frank P. Reiche filed a joint dissent. (Date issued: November 13, 1984; Length: 10 pages, including dissent)

AO 1984-55: Solicitation of Law Firm's Partners by PAC of a Client Bank

The Amerifirst Good Government Committee (the Committee), the separate segregated fund of the Amerifirst Federal Savings and Loan Association (Amerifirst), may not solicit contributions from lawyers associated with two law firms that represent Amerifirst because, although the firms receive client fees from Amerifirst, the lawyers are not employed by the bank. Instead, they receive compensation directly from their firms. The committee may, however, solicit one of the firm's lawyers who also serves as Chairman of the Board of Amerifirst, provided he is compensated by Amerifirst on a salaried basis. Under the election law, to be eligible for solicitations by a corporation's separate segregated fund, professional personnel must be employed by the corporation and paid on a salaried basis. 2 U.S.C. § 441b(b)(7); 11 CFR 114.1(c).

Since Amerifirst did not indicate whether or not the lawyers were Amerifirst stockholders or members, the Commission did not address their eligibility for solicitations under either of these circumstances. (Date issued: November 13, 1984; Length: 4 pages)

AO 1984-56: Exclusion of Book Payments from the Definition of Honorarium

Royalties and other agreed-upon payments made to Senator David Durenberger by Piranah Press for his book, Neither Madmen nor Messiahs, are not considered honoraria under the election law. Accordingly, they are not subject to the \$2,000 limit placed on an honorarium accepted by a federal officeholder. 2 U.S.C. §441.

Income which federal officeholders derive from books (e.g., royalties) is excluded from the election law's definition of honorarium. 11 CFR 110.12(b); AOs 1975-77 and 1978-59. Furthermore, quarterly payments Senator Durenberger receives from the publisher in exchange for promotional appearances and certain rights in the book are considered stipends, which are also excluded from the definition of honorarium. 11 CFR 110.12(c)(3). (Date issued: December 6, 1984; Length: 2 pages)

COURT CASES

FEC v. FURGATCH; FEC v. DOMINELLI

On November 20, 1984, the U.S. District Court for the Southern District of California dismissed FEC v. Furgatch (Civil Action No. 83-596-GT [M]) on the ground that the case failed to state a justiciable claim. Based on its ruling in the Furgatch suit, on November 30, 1984, the court also dismissed a "virtually identical case," FEC v. Dominelli (Civil Action No. 83-0595-GT [M]).

Background

In filing suit against Mr. Furgatch on March 25, 1983, the FEC claimed that he had violated the election law by failing to report independent expenditures of approximately \$25,008. 2 U.S.C. §434(c). Mr. Furgatch incurred the expenditures for two political ads he placed in The New York Times and The Boston Globe, respectively, which the Commission alleged expressly advocated the defeat of President Carter in his 1980 reelection bid. The FEC also claimed Mr. Furgatch had violated section 441d of the law by failing to include an adequate disclaimer notice on the ad he placed in The Boston Globe.

In filing suit against Mr. Dominelli on the same day, the FEC had asked the court to find that he had failed to report independent expenditures amounting to \$8,471. The FEC alleged that Mr. Dominelli had incurred the expenditures for an ad in a November 1980 issue of The Chicago Tribune, which expressly advocated President Carter's defeat.

Court's Ruling on the Furgatch Suit

In ruling on whether the political ads sponsored by Mr. Furgatch expressly advocated President Carter's defeat, and therefore constituted independent expenditures,* the court applied the standard contained in the Supreme Court's Buckley v. Valeo opinion. In Buckley v. Valeo, the Court had defined express advocacy as "communications containing express words of advocacy of election or defeat, such as 'vote for,' 'elect,' 'cast your ballot for,' 'Smith for Congress,' 'vote against,' 'defeat,' 'reject.'" Buckley v. Valeo, 424 U.S. 1, 44 (1976). The district court cited earlier

*An independent expenditure is an expenditure for a communication expressly advocating the election or defeat of a clearly identified candidate that is not made with the cooperation or prior consent of, or in consultation with, or at the request or suggestion of, any candidate or his/her authorized committees or agents. 11 CFR 100.16 and 109.1(a).

district and appeals court decisions which emphasized that "neither the purpose nor the effect of a political advertisement is determinative of the issue of whether the ad expressly advocates the election or defeat of a clearly identified candidate." See FEC v. CLITRIM, 616 F.2d 45, 53 (2d Cir. 1980); FEC v. AFSCME, 471 F.Supp. 315, 316 (D.D.C. 1979). Applying this express advocacy standard to Mr. Furgatch's ads, the court found that the pivotal question was "whether the phrase 'Don't let him do it' [was] the equivalent of the expression 'vote against Carter.'" (The remainder of the language in the ad was beyond the election law's scope because it contained only an implied message not to vote for President Carter.) Interpreting the word "it" in the phrase, the court concluded that the ad exhorted the reader not to let President Carter "hide his own record" or "degrade the electoral process and lessen the prestige of the office." The court then concluded that the phrase "Don't let him do it" did not constitute express advocacy. The court found that "the range of actions expressly recommended by the ad obviously did not include voting the President out of office." Consequently, the ad did not ask the reader to vote against the President.

Finally, the court noted that, since it had decided the case on grounds of statutory construction, it was not "necessary or desirable to [address] the defendants' constitutional challenges to sections 434(c) and 441d" of the election law.

CITIZENS FOR PERCY '84 v. FEC

On November 19, 1984, the U.S. District Court for the District of Columbia issued an opinion in Citizens for Percy '84 v. FEC (Civil Action No. 84-2653) stating that the FEC's delay in acting on an administrative complaint filed on April 26, 1984, by Citizens for Percy '84 (the Committee) was contrary to law. (The Committee was former Senator Charles H. Percy's principal campaign committee for his 1984 reelection campaign.) The court also ordered the FEC to conform its conduct to the decision within 30 days of the court's order. See 2 U.S.C. §437g(a)(8).

Background

On August 26, 1984, the Committee had petitioned the district court to declare that the FEC's failure to act on its administrative complaint was contrary to law. See 2 U.S.C. §437g(a)(8)(A). In the complaint, the Percy campaign had claimed that media expenditures made by Michael Goland on behalf of Rep. Thomas Corcoran, Senator Percy's opponent in the Illinois Senate primary, were coordinated with the Corcoran campaign. The Percy campaign had alleged that, since the expenditures were not independent, Mr. Goland had violated the election law by making excessive in-kind contributions to the

Corcoran campaign. See 2 U.S.C. §441a(a)(1)(A). Moreover, the Corcoran campaign had violated the law by accepting the contributions. See 2 U.S.C. §441a(f).

Court's Ruling

Noting that the FEC had not found reason to believe the respondent had violated the election law until October 2, 1984, more than five months after the Committee had filed its administrative complaint, the court concluded that the FEC had acted contrary to law. The court reasoned that, since Senator Percy's reelection campaign had been the "focus...of tremendous national interest," the agency did not have the discretion to give the complaint routine treatment.

FEC v. NRWC; NRWC v. FEC

On October 4, 1984, the U.S. District Court for the District of Columbia issued a consent order in the consolidated cases of FEC v. National Right to Work Committee and National Right to Work Committee v. FEC (Civil Action Nos. 77-2175 and 78-0315). The court required the National Right to Work Committee (NRWC) and its separate segregated fund, the Employee Rights Campaign Committee (ERCC), to return unlawful solicitations and to pay a civil penalty for violating the election law.

Background

In December 1983, the Supreme Court had ruled on the FEC's suit against NRWC. (For a summary of the Court's ruling, see p. 3 of the February 1983 Record.) The Court held that 267,123 persons solicited by NRWC for contributions to ERCC were not NRWC's "members" under any "reasonable interpretation" of 2 U.S.C. §441b(b)(4)(C). The Court then remanded the case to the appeals court to consider, among other things, "the...imposition of a \$10,000 civil penalty" on NRWC for unlawful solicitations to its separate segregated fund. On September 2, 1983, the appeals court found that the district court had erred in finding NRWC's violation to be "knowing and willful." The appeals court therefore concluded that the \$10,000 civil penalty imposed by the district court was unwarranted.

District Court's Decision

After the case had been remanded to the district court, the court accepted a consent order on October 4, 1984, which provides that:

- NRWC, ERCC and any of their agents will not solicit contributions to ERCC from persons other than NRWC's members. See 2 U.S.C. §441b(b)(4).
- Within thirty days of the date of the consent order, NRWC and ERCC will mail refunds totalling \$67,401.62 to those individuals unlawfully solicited on June 21 and September

9-15, 1976. (The court will grant extensions for reasonable delays.)

- Each refund will be accompanied by a letter informing the contributor that the courts have determined that the solicitation constituted a violation of the law's prohibition on corporate contributions which was not knowing and willful. 2 U.S.C. §441b.
- The refund checks will expressly, and in bold print, require deposit within 30 days from the date drawn.
- NRWC and ERCC will report to the FEC on the status of the refund checks indicating whether they were undeliverable, cleared through the bank or remained outstanding.
- Within 30 days of the consent order, NRWC and ERCC will pay a \$5,000 civil penalty (without interest) to the U.S. Treasury.
- Within 30 days of the consent order, NRWC and ERCC will pay FEC court costs from the district court proceeding amounting to \$4,483.64 (without interest).
- Within an agreed upon time, NRWC and ERCC will donate to the Salvation Army: any contribution refunds that were undeliverable; all checks which remain outstanding; and \$15,000 in lieu of the interest accrued from April 24, 1980, on refundable contributions, NRWC's civil penalty and the FEC's court costs.

Once NRWC and ERCC have satisfied these conditions, the parties will file a joint motion to:

- Have the Aetna Casualty and Surety Company released from any and all obligations under the Supersedeas Bond filed with the district court in these actions; and
- Have all NRWC and ERCC contributor information which was filed under seal with the district court returned to NRWC and ERCC.

In addition, the FEC will return to NRWC and ERCC all contributor information that the defendants presented to the FEC under seal, together with all copies, lists, summaries or digests made from them.

STATISTICS

1984 PRESIDENTIAL PRIMARY CAMPAIGNS

During the first 18 months of the Presidential campaign, 14 Presidential primary campaigns raised a total of \$98 million and spent \$88 million. This information was contained in the FEC Reports on Financial Activity, 1983-1984, Interim Report No. 6, Presidential Pre-Nomination Campaigns, released on November 29, 1984. The study provides campaign finance information on those campaigns whose activity exceeded \$100,000.

Chart I below details how each campaign spent its funds. Chart II, on page 9, provides information on the source of campaign support provided to each campaign through June 1984. Figures for receipts and disbursements have been adjusted to reflect transfers among authorized committees of the same campaign.

Copies of the FEC Reports on Financial Activity, 1983-1984, Interim Report No. 6, Presidential Pre-Nomination Campaigns are available for \$1.00 per copy from the FEC's Office of Public Records, 1325 K Street, N.W., Washington, D.C. 20463. Checks for the report should be made payable to the Federal Election Commission.

CHART I DISBURSEMENTS OF PRESIDENTIAL PRIMARY CANDIDATES THROUGH 6/30/84

Candidate	Adjusted Campaign Total*	Expenditures Subject to Limit**	Latest Cash on Hand	Debts Owed By Campaign
Askew(D)	\$ 2,541,230	\$ 1,847,178	\$ 201	\$ 119,114
Cranston(D)	5,550,181	3,874,219	42,734	45,300***
Glenn(D)	11,489,342	7,570,151	146,054	2,930,880
Hart(D)	13,584,333	11,335,890	175,307	4,484,785
Hollings(D)	2,409,449	2,100,544	22,266	14,236
Hubbard(D)	182,427	0	529	53,421
Jackson(D)	5,344,129	4,665,296	378,095	386,911
Johnson(CP)	160,340	0	16,202	11,650
LaRouche(D)	3,743,431	3,441,226	29,877	2,154,172
McGovern(D)	916,491	685,502	-526	117,417
Mondale(D)	23,308,423	17,681,389	549,133	4,895,293
Willis(D)	136,003	0	0	112,742
Reagan(R)	18,242,826	13,726,487	8,216,265	500,112
Bergland(L)	291,980	0	14,440	2,154,172
Dem. Subtotal	69,185,439	53,201,395	1,343,670	15,314,251
Rep. Subtotal	18,242,828	13,726,487	8,216,255	500,112
Other Subtotal	452,320	0	30,642	2,165,822
GRAND TOTAL	\$87,880,585	\$66,927,882	\$9,590,577	\$17,980,185

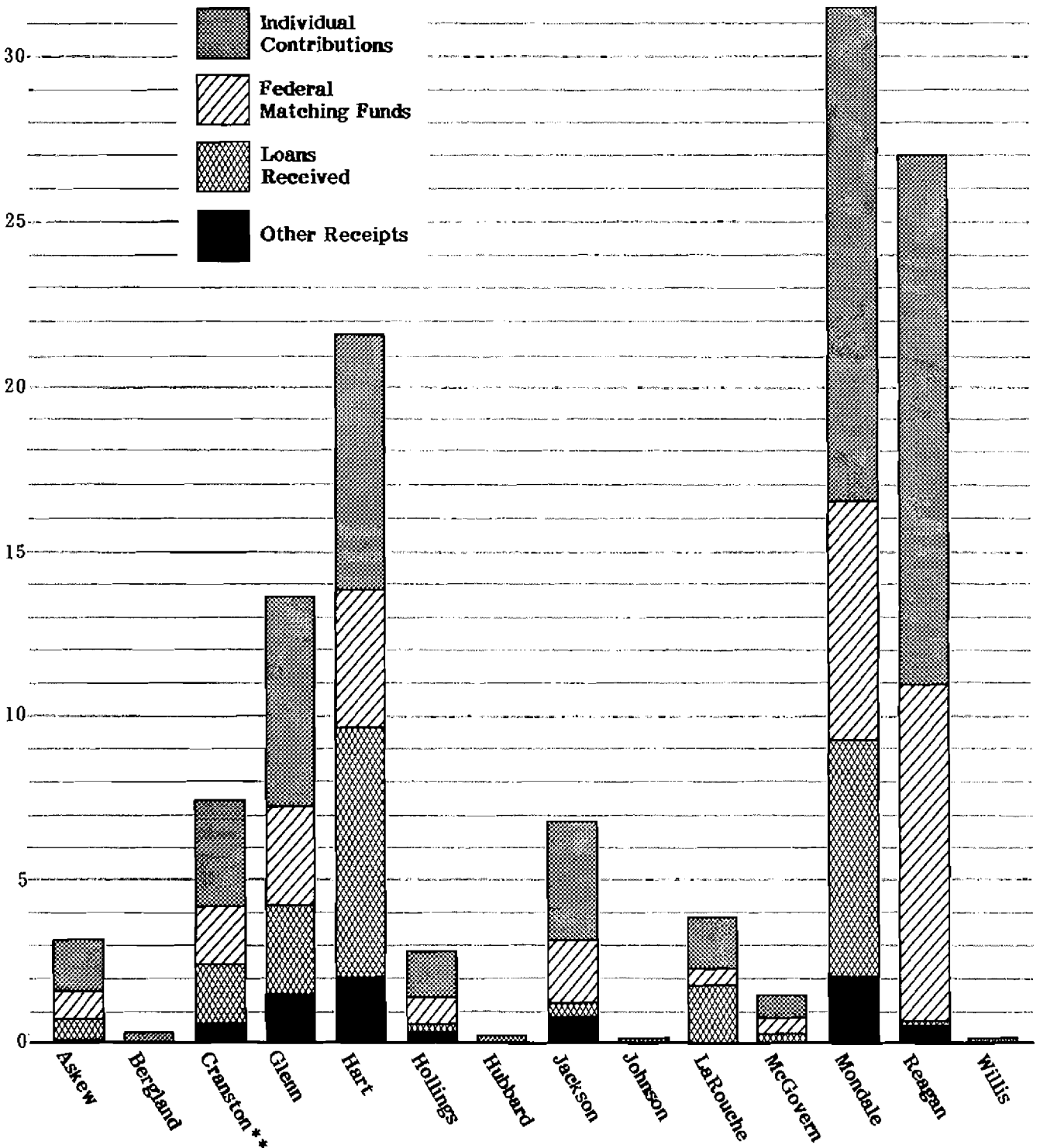
*Includes total reported disbursements minus transfers among authorized committees of the same campaign. The total excludes refunds, rebates, loan repayments and refunded contributions.

**Does not include certain expenditures for campaign fundraising and compliance costs that are exempt from each publicly funded candidate's overall spending limit and his/her state-by-state spending limits.

***Debts owed by the Cranston for President Committee include only outstanding loans and do not include debts owed to vendors.

**CHART II
RECEIPTS* OF
PRESIDENTIAL PRIMARY CANDIDATES THROUGH 6/30/84**

Millions of Dollars



* Includes total receipts minus transfers between each candidate's authorized committees.

**The Cranston for President Committee has not identified all the sources of funds received during 1984. The committee had received approximately \$1.8 million in federal matching funds through June 30, 1984.

FINANCIAL ACTIVITY OF REPUBLICAN AND DEMOCRATIC PARTY COMMITTEES

Republican party committees at the national, state and local levels raised a total of \$207.7 million and spent \$171.0 million from January 1, 1983, through June 30, 1984. Their Democratic counterparts raised a total of \$59.7 million and spent \$52.1 million during the same period.

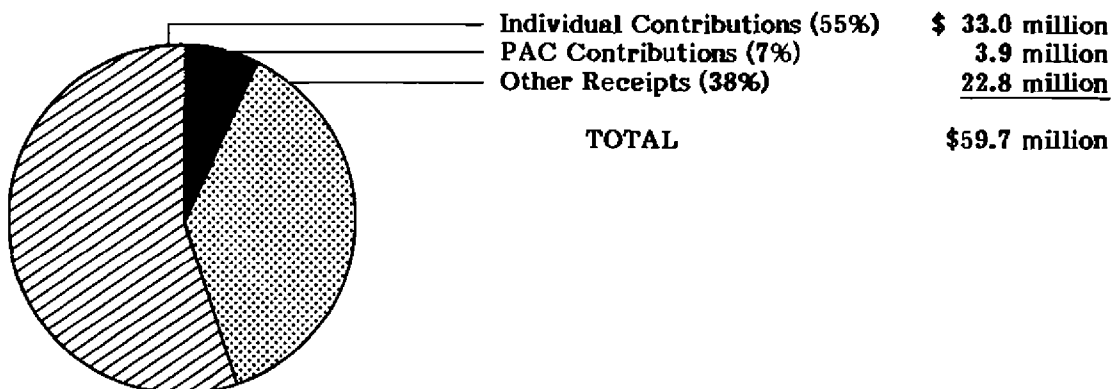
The study released by the FEC on November 4, 1984, showed that, during the first 18 months of the current election cycle, Democratic party committees' receipts increased 141 percent over funds received during the same period in the 1982 election cycle. Republican committees' receipts increased by 29 percent.

Between January 1, 1983, and October 17, 1984, Republican party committees at the national level raised a total of \$225.4 million and spent \$217.6 million. Their Democratic counterparts raised \$57.3 million, on page 11, and, on page 12, spent \$54.4 million.

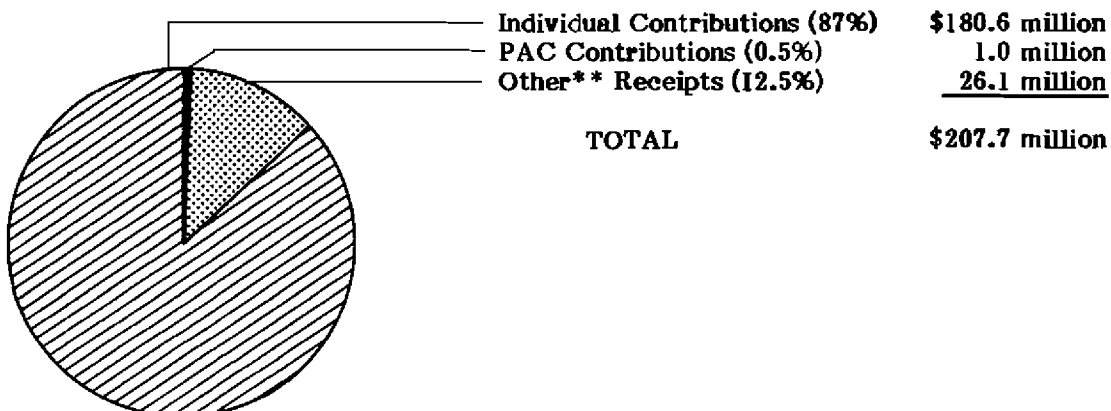
See the charts below for depictions of each major party's receipts. More detailed information may be obtained from the four-volume, FEC Report on Financial Activity, 1983-84, Interim Report No. 8: Party and Non-Party Committees. The study may be purchased at \$15 per volume from the FEC.

**CHART III
RECEIPTS* OF MAJOR PARTIES, 1/1/83-6/30/84**

DEMOCRATIC RECEIPTS BY SOURCE



REPUBLICAN RECEIPTS BY SOURCE

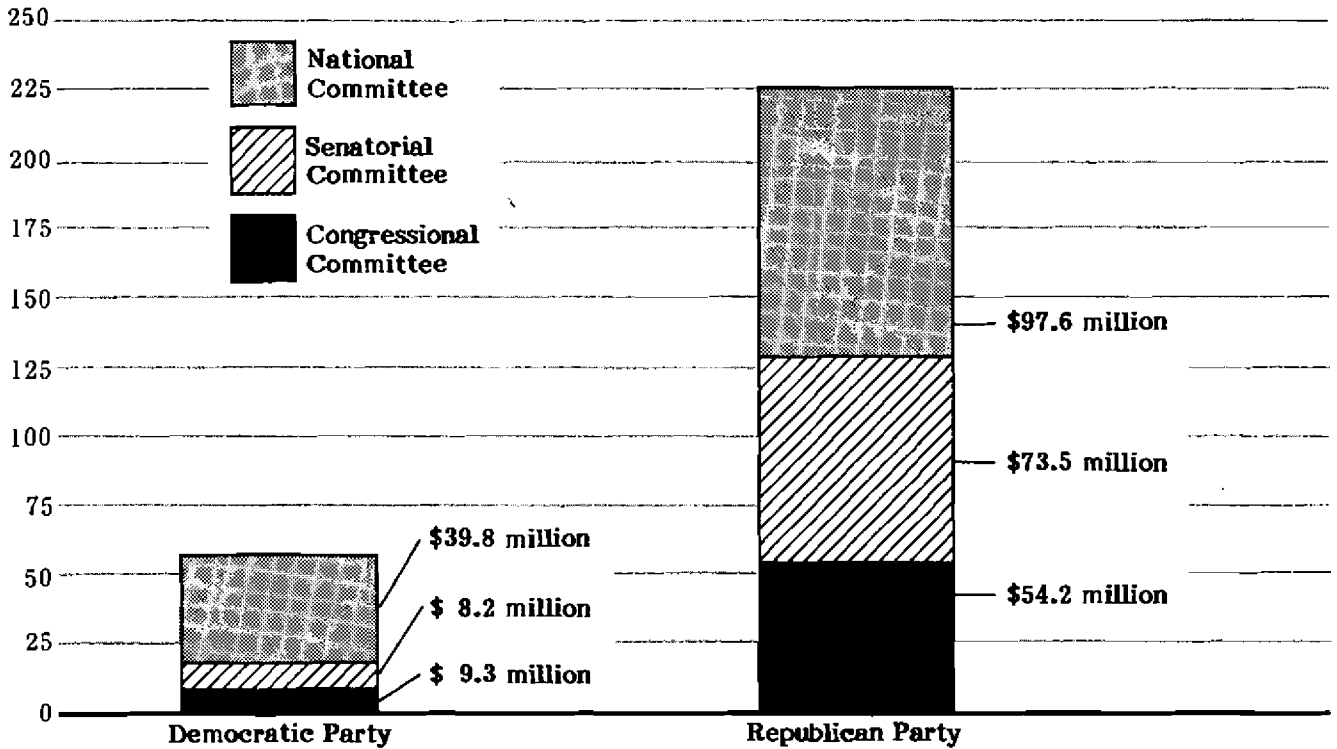


*Includes total receipts minus transfers among each party's committees.

**Other receipts include contributions from other political committees and unregistered organizations (e.g., local party organizations); loans or loan repayments received by party committees; offsets to expenditures; dividends, interest and other miscellaneous income.

**CHART IV
RECEIPTS* OF
NATIONAL PARTY COMMITTEES, 1/1/83-10/17/84**

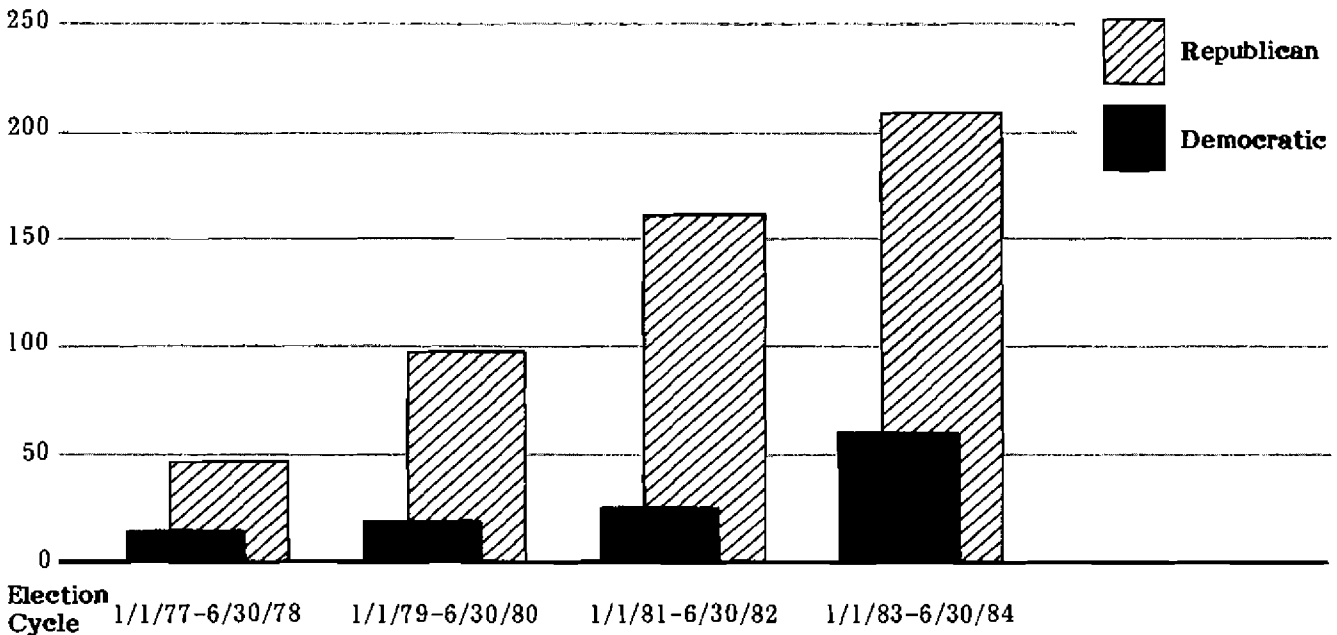
Millions of Dollars



*Includes total receipts minus transfers between each party's respective committees.

**CHART V
FUNDS RAISED BY MAJOR PARTIES**

Millions of Dollars



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Write the Superintendent of Documents, Government Printing Office, Washington, D.C. 20402, making reference to the publication and its order number.

FEDERAL REGISTER**FEDERAL REGISTER NOTICES**

Copies of notices are available in the Public Records Office.

Notice Title

- 1984-17 Public Records and the Freedom of Information Act: Access to Public Disclosure Division Documents; Amendment of Fee Provisions; Notice of Effective Date for Final Rules (49 Fed. Reg. 41016, October 19, 1984)
- 1984-18 11 CFR Part 6: Enforcement of Non-discrimination on the Basis of Handicap in FEC Programs; Notice of Effective Date for Final Rules (49 Fed. Reg. 44091, November 2, 1984)
- 1984-19 Notice of Disposition of Rulemaking Petition; National Council of Farmer Cooperatives (No action taken by FEC) (49 Fed. Reg. 48210, December 11, 1984)

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