



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 1378

Date Filmed 8/26/82 Camera No. --- 2

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FEDERAL ELECTION COMMISSION

- ① Memo to the file from Ken Gross
- ② Original pages 7 + 8 of the General Council's Report - contains discussions of the proposed conciliation agreements
- ③ Attachment 3 to the General Council's Report - proposed conciliation agreements
- ④ All correspondence occurring during conciliation
- ⑤ Routing slip for ② G.C. Report + ③ Memo to Commission
- ⑥ Original certification regarding probable cause findings -

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

*contains reference to conciliation agreements*

- |                                     |  |                          |  |
|-------------------------------------|--|--------------------------|--|
| <input type="checkbox"/>            | (1) Classified Information   | <input type="checkbox"/> | (6) Personal privacy                             |
| <input type="checkbox"/>            | (2) Internal rules and practices   | <input type="checkbox"/> | (7) Investigatory files                          |
| <input checked="" type="checkbox"/> | (3) Exempted by other statute - 2 U.S.C. § 437g (w) (4) (A) (i)<br><i>Conciliation documents</i> | <input type="checkbox"/> | (8) Banking Information                          |
| <input type="checkbox"/>            | (4) Trade secrets and commercial or financial information  | <input type="checkbox"/> | (9) Well Information (geographic or geophysical) |
| <input checked="" type="checkbox"/> | (5) Internal Documents   |                          |  |

Signed Marybeth Tavant  
 date 7/21/82

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

July 21, 1982

Joseph F. Shanahan  
Alexauken Creek Road  
RD 2  
Lambertville, New Jersey 08530

RE: MUR 1378  
The Simon Committee  
Gabriele Pitcairn Pendleton

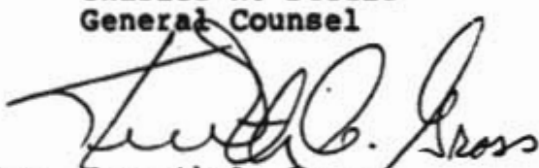
Dear Mr. Shanahan:

On July 19, 1982, the Commission accepted the conciliation agreements signed by your clients in settlement of violations of 2 U.S.C. § 441a, a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter, and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

Enclosed you will find fully executed copies of the final conciliation agreements for your files. Please be reminded that The Simon Committee is required to file a Year End 1981 Report which should cover 10/13/81 - 12/31/81 and a July 31, 1982 Mid Year Report which should cover 1/1/82 - 6/30/82. Should you have any questions, please direct them to Marybeth Tarrant at (202) 523-4529.

Sincerely,

Charles N. Steele  
General Counsel

  
By: Kenneth A. Gross  
Associate General Counsel

Enclosures  
Conciliation Agreements

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Joseph F. Shanahan  
Alexauken Creek Road  
RD 2  
Lambertville, New Jersey 08530

RE: MUR 1378  
The Simon Committee  
Gabriele Pitcairn Pendleton

Dear Mr. Shanahan:

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Enclosed you will find fully executed copies of the final conciliation agreements for your files. Please be reminded that The Simon Committee is required to file a Year End 1981 Report which should cover 10/13/81 - 12/31/81 and a July 31, 1982 Mid Year Report which should cover 1/1/82 - 6/30/82. Should you have any questions, please direct them to Marybeth Tarrant at (202) 523-4529.

Sincerely,

Charles N. Steele  
General Counsel

By: Kenneth A. Gross  
Associate General Counsel

Enclosures  
Conciliation Agreements

MT  
7/20/82

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
Gabriele Pitcairn Pendleton ) NUR 1378

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RECEIVED  
CHIEF OF THE  
GENERAL COUNSEL

CONCILIATION AGREEMENT

This matter having been initiated by the Federal Election Commission (hereinafter "the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities, and after probable cause to believe having been found that Gabriele Pitcairn Pendleton ("Respondent") violated 2 U.S.C. § 441a(a)(1)(C) by contributing in excess of \$5,000 in 1979 and 1980 to The Simon Committee.

NOW, THEREFORE, the Commission and Respondent, having duly entered into conciliation pursuant to 2 U.S.C. § 437g(a)(4)(A)(i) do hereby agree as follows:

I. The Commission has jurisdiction over the Respondent and the subject matter of this proceeding.

II. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondent enters voluntarily into this Agreement with the Commission.

IV. The pertinent fact in this matter is that the Respondent contributed \$9,951.50 in 1979 and \$10,187 in 1980 to The Simon Committee thereby exceeding her contribution limitation by \$4,951.50 and \$5,187 respectively.

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WHEREFORE,

V. Respondent violated 2 U.S.C. § 441a(a)(1)(C).

VI. It is the Commission's position that it has jurisdiction over limitations on contributions to draft committees and, for purposes of settling this matter, Respondent does not contest the Commission's position.

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

GENERAL CONDITIONS

VIII. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

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II. It is mutually agreed that this agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

July 20, 1982  
Date

Charles N. Steele  
General Counsel  
Federal Election Commission

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

29 June 1982  
Date

*Gabriele Pitcairn Pendleton*  
Gabriele Pitcairn Pendleton

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
The Simon Committee ) NUR 1378

CONCILIATION AGREEMENT

This matter having been initiated by the Federal Election Commission (hereinafter "the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities, and after probable cause to believe having been found that The Simon Committee ("Respondent") violated 2 U.S.C. §§ 434(a)(4)(A)(i) and 441a(f) and 11 C.F.R. §§ 104.11 and 104.12.

NOW, THEREFORE, the Commission and Respondent, having duly entered into conciliation pursuant to 2 U.S.C. § 437g(a)(4)(A)(i) do hereby agree as follows:

- I. The Commission has jurisdiction over the Respondent and the subject matter of this proceeding.
- II. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.
- III. Respondent enters voluntarily into this Agreement with the Commission.
- IV. The pertinent facts in this matter are as follows:
  - 1. Respondent did not file its 1980 Year End Report until October 19, 1981.
  - 2. Respondent accepted excessive contributions of \$4,951.50 in 1979 and \$5,187 in 1980 from Gabriele Pitcairn Pendleton.

G.M.J.

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3. Respondent failed to disclose until October 15, 1981 the source of its cash on hand at the time of registration.

4. Respondent failed to continuously report an outstanding loan of \$3,500 owed to Gabriele Pitcairn Pendleton until amendments were filed on October 19, 1981.

**WHEREFORE,**

V. Respondent violated 2 U.S.C. §§ 434(a)(4)(A)(i) and 441(f) and 11 C.F.R. §§ 104.11 and 104.12.

VI. Respondent will continue to report its \$3,500 outstanding debt until it is extinguished.

VII. Respondent will continue to file reports until it terminates as required by 2 U.S.C. § 434.

VIII. It is the Commission's position that it has jurisdiction over limitations on contributions to draft committees and, for purposes of settling this matter, Respondent does not contest the Commission's position.

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

**GENERAL CONDITIONS**

X. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issue

G.M.J.

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herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

XI. It is mutually agreed that this agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

June 28, 1982  
Date

Charles N. Steele  
General Counsel  
Federal Election Commission

July 20, 1982 BY:

Kenneth A. Gross  
Associate General Counsel

\_\_\_\_\_  
Date

G. Morgan Jones, III  
The Simon Committee

BY: G. Morgan Jones, III

ITS: Treasurer

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G.M.J.

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
The Simon Committee ) MUR 1378  
Gabriele Pitcairn Pendleton )

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on July 19, 1982, the Commission decided by a vote of 5-0 to take the following actions in MUR 1378:

1. Approve the signed conciliation agreements with the Simon Committee and Gabriele Pitcairn Pendleton as submitted with the Memorandum to the Commission dated July 15, 1982.
2. Close the File.

Commissioners Elliott, Harris, McDonald, McGarry and Reiche voted affirmatively; Commissioner Aikens abstained in this matter.

Attest:

7-19-82  
Date

Marjorie W. Emmons  
Marjorie W. Emmons  
Secretary of the Commission

Received in Office of Commission Secretary:  
Circulated on 48 hour tally basis:

7-15-82, 9:48  
7-15-82, 4:00

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
The Simon Committee )  
Gabriele Pitcairn Pendleton )

MUR 1378

CERTIFICATION

I, Marjorie W. Emons, Recording Secretary for the Federal Election Commission Executive Session on March 30, 1982, do hereby certify that the Commission decided by a vote of 4-2 to take the following actions in MUR 1378:

1. Find probable cause to believe that the Simon Committee violated 2 U.S.C. §434(a)(4)(A)(i) and 11 C.F.R. §104.11 and §104.12 in connection with certain reporting matters.
2. Find probable cause to believe that Gabriele Pitcairn Pendleton violated 2 U.S.C. §441a(a)(1)(C) in 1979 and 1980.
3. Find probable cause to believe that the Simon Committee violated 2 U.S.C. §441a(f) by accepting excessive contributions from Gabriele Pitcairn Pendleton.
- 4.

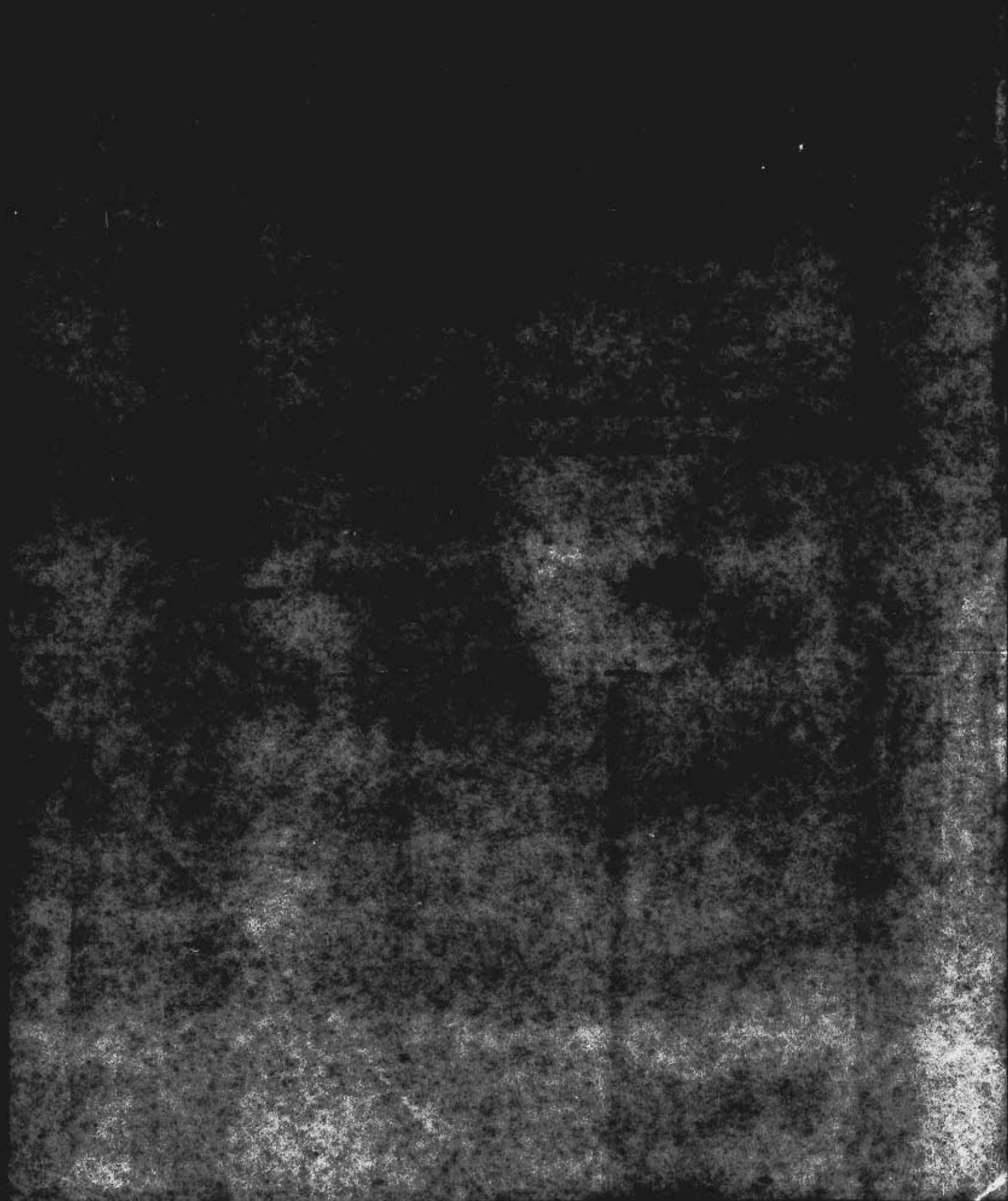
Commissioners Harris, McDonald, McGarry, and Reiche voted affirmatively for the decision. Commissioners Aikens and Elliott dissented.

Attest:

3/30/82  
Date

Marjorie W. Emons  
Marjorie W. Emons  
Secretary of the Commission

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In the Matter of )  
The Simon Committee )  
Gabriele Pitcairn Pendleton ) MUR 1378

82 MAR 18 P12: 58  
**EXECUTIVE SESSION**

GENERAL COUNSEL'S REPORT MAR 30 1982

I. Background

On May 6, 1981, the Commission found reason to believe that both the Simon Committee ("the Committee") and Gabriele Pitcairn Pendleton violated 2 U.S.C. § 441a. In addition, the Commission found reason to believe that the Committee violated 2 U.S.C. § 434(a)(4)(A)(i) and 11 C.F.R. §§ 104.11 and 104.12. On May 8, 1981, letters enclosing the General Counsel's Factual and Legal Analysis were sent to both respondents.

On May 15, 1981, G. Morgan Jones, III, treasurer of the Committee, called to indicate that he would be responding in writing. On May 21, 1981, this office received a letter stating that the Committee was preparing a response. No response was received from either Mr. Jones or Mrs. Pendleton.

Due to the lack of written replies to the RTB findings, briefs were sent to both respondents, on August 7, 1981, informing them of the General Counsel's intent to recommend that the Commission find probable cause to believe that both the Committee and Mrs. Pendleton had violated the Act.

On August 21, 1981, Mr. Jones called this office and wanted to know what his options were. It was suggested that he send

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in a reply brief. On August 26, 1981, this office received a letter which stated that Joseph F. Shanahan would be acting as the Committee's counsel.

Subsequently, on September 8, 1981, this office received a reply brief from Mr. Shanahan. However, the brief only responded for Mrs. Pendleton, not the Committee. Accordingly, Mr. Shanahan was contacted by this office and was asked if he intended to represent the Committee. As the answer was yes, a copy of the General Counsel's Brief regarding the Committee was sent on September 23, 1981.

On October 15, 1981, Mr. Shanahan sent in the Committee's reply brief along with an affidavit of G. Morgan Jones, III. In addition, the Committee filed a 1980 Year End Report, Schedule C's for amendments for all 1980 reports and a Mid-Year Report which covered up to October 12, 1981. See Attachment 1.

## II. Legal Analysis

### A. Reporting violations

Pursuant to 2 U.S.C. § 434(a)(4)(A)(i) all political committees other than authorized committees of a candidate are required to file quarterly reports in an election year. The Committee has now filed its Year End 1980 Report. Under 11 C.F.R. § 104.11 all outstanding debts and obligations owed by a political committee are required to be continuously reported

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until extinguished. The Committee has now amended its reports to include an outstanding \$3,500 loan owed to Mrs. Pendleton. Pursuant to 11 C.F.R. § 104.12 all political committees which have cash on hand at the time of registration are required to disclose the source of such funds. In his affidavit, Mr. Jones stipulates that the source of the \$300 cash on hand was Mrs. Pendleton.

Although the Committee has now corrected its reporting violations, we recommend that the Commission find probable cause and seek to conciliate these matters. The cooperative acts of the Committee mitigate the seriousness of the violations to some degree.

B. Contribution limit violations

Pursuant to 2 U.S.C. § 441a(a)(1)(C) a person is prohibited from making contributions to any other political committee (i.e. not an authorized candidate committee or a committee maintained and established by a national political party) in any calendar year which, in the aggregate, exceed \$5,000. Section 441a(f) prohibits the knowing acceptance of excessive contributions.

From the reports filed by the Committee, it appears Mrs. Pendleton exceeded her limit in 1979 by \$4,951.50 and in 1980 by \$5,187.00. 1/

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1/ Three hundred dollars (\$300) has been added to the figure reported in the First General Counsel's Report due to an additional contribution which was reported on the 1980 Year End Report.

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Most of Mr. Shanahan's arguments in both briefs center on erroneous interpretations of the Act and the Commission Regulations due to his misreading of the Campaign Guide for Presidential Candidates and Their Committees. Mr. Shanahan argues that the Committee should be treated as a "testing-the-waters" committee. Accordingly, Mr. Shanahan contends that the Committee and Mrs. Pendleton did not violate the Act because any payments made for the purpose of determining whether an individual should become a candidate are not considered contributions if the individual does not subsequently become a candidate.

See 11 C.F.R. § 100.7(b)(1). However, Mr. Shanahan has failed to recognize that the Committee, in order to qualify for that exemption, had to be operating with the approval and cooperation of the individual who is considering becoming a candidate. See Advisory Opinions 1979-49 and 1981-32. As Mr. Simon disavowed the Committee and never became a candidate, the Committee must be regarded as a "draft" committee. As such, the Commission has previously determined that the Committee was prohibited from accepting contributions in excess of \$5,000 per calendar year from individual contributors and other political committees. 2/

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2/ It should be noted that in Advisory Opinion 1979-49 which was issued to the Simon Committee when C.C. Clinkscales, III was treasurer, the Committee was specifically informed of what contribution limitations applied to them. See Attachment 2.

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While Mr. Shanahan does not refer to it, the decision reached in Federal Election Commission v. Machinists Non-Partisan Political League, 655 F. 2d (D.C. Cir. 1981), cert. denied, 50 U.S.L.W. 3269 (October 13, 1981) ("MNPL"), does relate to this MUR. In that decision the Court of Appeals held that the Commission did not have jurisdiction to apply limits on contributions to pre-1979 Amendment draft groups. However, based on the following arguments, the General Counsel recommends that the Commission proceed as though it has jurisdiction to enforce the limitation on contributions in this MUR. See General Counsel's Report dated February 9, 1982 in MUR 1038.

At the present time, only the D.C. Circuit has ruled that the statute, § 441a(a)(1)(C), (2)(C), does not reach draft committees. The fact that the Supreme Court denied certiorari review in the MNPL case does not mean the Court agreed with the merits of the lower court decision. Darr v. Burford, 339 U.S. 200, 226 (1950) (Justice Frankfurter dissenting: "The denial means that this Court has refused to take the case. It means nothing else."); see also, Linzer, "The Meaning of Certiorari Denials," 79 Colum.L. Rev. 1227 (1979).

Moreover, two district courts in other circuits have either expressly or impliedly rejected the broad proposition that the Commission does not have jurisdiction over draft committees. In Federal Election Commission v. Wisconsin Democrats for Change in 1980, No. 80-C-124 (W.D. Wisc. Apr. 24, 1980), the court rejected

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that argument, stating: "[The Act] appears to cover 'draft' committees in the same manner as any other committees formed for the support of candidates for public office." Id., slip op. at 4. In Federal Election Commission v. Florida for Kennedy Committee, 492 F. Supp. 587 (S.D. Fla. 1980), the court declined to reach the jurisdictional issue directly, and stated that it could not hold "that the activities of the various draft committees were efforts solely to convince the Senator to run, rather than help elect him." 492 F. Supp. 595. Because there is authority contrary to the analysis of the MNPL court, the Commission need not feel compelled to decline enforcement of the statute against draft committees.

The Commission's likelihood of success in enforcing the statute in the D.C. Circuit, of course, is small. <sup>3/</sup> Well-settled doctrines of stare decisis, under which the legal principles enunciated by a court are followed subsequently, virtually assure that the D.C. Circuit would rule consistently that the \$5,000 per committee contribution limit does not apply to contributions to draft committees. In other courts, the Commission will no doubt have to counter affirmative defenses based on collateral estoppel doctrines. Under traditional collateral estoppel theory, factual or legal issues which have been litigated between parties are precluded from subsequent litigation, at least as between those parties.

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<sup>3/</sup> The Committee initially listed its address as being in Washington, D.C. In later reports, its address was listed as being in Pennsylvania.

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Commissioner v. Sunnen, 333 U.S. 591 (1948). However, the General Counsel believes that the Commission could survive collateral estoppel defenses raised by these respondents. First of all, mutuality of parties, i.e. involvement of only the parties to the MNPL decision, and exact identity of the facts would not be present. Commissioner v. Sunnen, *supra*; *but cf.* Montana v. United States, 440 U.S. 147, 154 n. 5 (1979); Parklane Hosiery Co. v. Shore, 439 U.S. 322, 324 n. 4 (1979). Moreover, where a question of "national law" is involved, relitigation has been permitted. American Medical International, Inc. v. Secretary of Health, Education and Welfare, No. 79-1460 (D.C. Cir. Aug 14, 1981); Western Oil & Gas Association v. EPA, 633 F.2d 803 (9th Cir. 1980); Divine v. Commissioner, 500 F.2d 1041 (2d Cir. 1974); United States v. Anaconda Co. 445 F. Supp. 486 (D.D.C. 1977).

In view of the foregoing, the General Counsel believes that the Commission is well within its authority in enforcing the \$5,000 per committee limit as it pertains to the contributions here involved to the Simon Committee. The General Counsel therefore recommends that the Commission find probable cause to believe that both Mrs. Pendleton and the Committee violated the Act.

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*[Faint, illegible text, possibly bleed-through from the reverse side of the page]*



of the total amount in excess, is appropriate under the circumstances. Because Mrs. Pendleton initially filed an independent expenditure report form, it appears that she may have believed she was not contributing to a committee but, instead, was making an independent expenditure. Independent expenditures are not subject to limitation. As the Committee had some minor reporting violations, an additional \$300 was added to the Committee's proposed civil penalty.

#### IV. Recommendation

1. Find probable cause to believe that the Simon Committee violated 2 U.S.C. §§ 434(a)(4)(A)(i) and 11 C.F.R. §§ 104.11 and 104.12 in connection with certain reporting matters.
2. Find probable cause to believe that Gabriele Pitcairn Pendleton violated 2 U.S.C. § 441a(a)(1)(C) in 1979 and 1980.
3. Find probable cause to believe that the Simon Committee violated 2 U.S.C. § 441a(f) by accepting excessive contributions from Gabriele Pitcairn Pendleton.
4. Approve the attached conciliation agreements.
5. Approve the attached letter.

18 March 1982  
Date

  
Charles N. Steele  
General Counsel

#### Attachments

1. Reports filed by Simon Committee
2. AO 1979-49
3. Proposed conciliation agreements (2)
4. Proposed letter

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**AMENDMENT TO FIRST QUARTER  
LOANS 1980  
REPORT**

Name of Guarantor or Party: **THE SIGN COMMITTEE**

Station:  Primary  General  Other (specify): **AMENDMENT**

A. Full Name, Mailing Address and ZIP Code of Loan Source	Original Amount of Loan	Cumulative Payments To Date	Balance Outstanding at Close of This Period
<b>MRS GERRIE PITMAN PERDUE 604 205 CHATELAIN ORAN ATHIN, PA, 19609</b>	<b>3500.00</b>	<b>0</b>	<b>3500.00</b>

Terms: Date Incurred **8-28-79** Date Due \_\_\_\_\_ Interest Rate \_\_\_\_\_ % (or)  Secured

List All Endorsers or Guarantors (if any) to item A

1. Full Name, Mailing Address and ZIP Code	Name of Employer	Amount Guaranteed Outstanding: \$
	Occupation	
2. Full Name, Mailing Address and ZIP Code	Name of Employer	Amount Guaranteed Outstanding: \$
	Occupation	
3. Full Name, Mailing Address and ZIP Code	Name of Employer	Amount Guaranteed Outstanding: \$
	Occupation	

B. Full Name, Mailing Address and ZIP Code of Loan Source	Original Amount of Loan	Cumulative Payments To Date	Balance Outstanding at Close of This Period

Station:  Primary  General  Other (specify):

Terms: Date Incurred \_\_\_\_\_ Date Due \_\_\_\_\_ Interest Rate \_\_\_\_\_ % (or)  Secured

List All Endorsers or Guarantors (if any) to item B

1. Full Name, Mailing Address and ZIP Code	Name of Employer	Amount Guaranteed Outstanding: \$
	Occupation	
2. Full Name, Mailing Address and ZIP Code	Name of Employer	Amount Guaranteed Outstanding: \$
	Occupation	
3. Full Name, Mailing Address and ZIP Code	Name of Employer	Amount Guaranteed Outstanding: \$
	Occupation	

SUBTOTALS This Period This Page (optional) ..... **Attachment 1, Pg. 1**

TOTALS This Period (last page in this line only) ..... **3500.00**

Carry outstanding balance only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.

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Form 1041-1  
1950

STATEMENT TO SECURE  
LOANS QUARTER  
1950 SEC REPORT

Part of Form 1041-1  
See instructions  
for each numbered box

2

Name of Guarantor or Party **THE SIOGAL COMMITTEE** 119 All: 34

A Full Name, Mailing Address and ZIP Code of Loan Source <b>MRS. GABRIELE FITCH Box 286 CANTONWOOD TENDERS GAYN ATHYN CO. 19009</b>	Original Amount of Loan <b>3500.00</b>	Cumulative Payments To Date <b>0.</b>	Balance Outstanding at Close of This Period <b>3500.00</b>
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Terms: Date Incurred **5-15-50** Date Due \_\_\_\_\_ Interest Rate \_\_\_\_\_ % Secured

List All Employers or Guarantors (if any) to Item A

1. Full Name, Mailing Address and ZIP Code	Name of Employer	Amount Guaranteed Outstanding: \$
	Occupation	
2. Full Name, Mailing Address and ZIP Code	Name of Employer	Amount Guaranteed Outstanding: \$
	Occupation	
3. Full Name, Mailing Address and ZIP Code	Name of Employer	Amount Guaranteed Outstanding: \$
	Occupation	

B. Full Name, Mailing Address and ZIP Code of Loan Source	Original Amount of Loan	Cumulative Payments To Date	Balance Outstanding at Close of This Period
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Section:  Primary  General  Other (specify):  
Terms: Date Incurred \_\_\_\_\_ Date Due \_\_\_\_\_ Interest Rate \_\_\_\_\_ % Secured

List All Employers or Guarantors (if any) to Item B

1. Full Name, Mailing Address and ZIP Code	Name of Employer	Amount Guaranteed Outstanding: \$
	Occupation	
2. Full Name, Mailing Address and ZIP Code	Name of Employer	Amount Guaranteed Outstanding: \$
	Occupation	
3. Full Name, Mailing Address and ZIP Code	Name of Employer	Amount Guaranteed Outstanding: \$
	Occupation	

SUBTOTALS This Period This Page (optional) ..... **Attachment 1, pg. 2**

TOTALS This Period (last page in this line only) ..... **3500.00**

Carry outstanding balance only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.

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INDEPENDENT TO THIRD QUARTER 1960 PFC REPORT.

Part of amount of Loan received for each combined loan RECEIVED 3

1. Name of Institution to Which Loan is Made		Original Amount of Loan	Cumulative Payments To Date	Balance Outstanding at Close of This Period
THE SIMON COMMITTEE		3500.00	0	3500.00
A. Full Name, Mailing Address and ZIP Code of Loan Source MRS GREGG AITKEN Box 258 WASHINGTON PENNSYLVANIA BRIDGEMAN PA. 19009 Section: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify): <u>ASSURANCE</u>				
Terms: Date Insured <u>5/25/59</u> / Date Due _____ Interest Rate _____ % <input type="checkbox"/> Secured				
List All Endorsers or Guarantors (if any) to Item A				
1. Full Name, Mailing Address and ZIP Code		Name of Employer		
		Occupation		
		Amount Guaranteed Outstanding: \$		
2. Full Name, Mailing Address and ZIP Code		Name of Employer		
		Occupation		
		Amount Guaranteed Outstanding: \$		
3. Full Name, Mailing Address and ZIP Code		Name of Employer		
		Occupation		
		Amount Guaranteed Outstanding: \$		
B. Full Name, Mailing Address and ZIP Code of Loan Source		Original Amount of Loan	Cumulative Payments To Date	Balance Outstanding at Close of This Period
Section: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):				
Terms: Date Insured _____ / Date Due _____ Interest Rate _____ % <input type="checkbox"/> Secured				
List All Endorsers or Guarantors (if any) to Item B				
1. Full Name, Mailing Address and ZIP Code		Name of Employer		
		Occupation		
		Amount Guaranteed Outstanding: \$		
2. Full Name, Mailing Address and ZIP Code		Name of Employer		
		Occupation		
		Amount Guaranteed Outstanding: \$		
3. Full Name, Mailing Address and ZIP Code		Name of Employer		
		Occupation		
		Amount Guaranteed Outstanding: \$		
SUBTOTALS This Period This Page (optional) .....				Attachment 1, pg. 3
TOTALS This Period (last page in this line only) .....				3500.00

Carry outstanding balances only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.

81031994973  
 782040344556

4

RECEIVED  
30418

REPORT OF RECEIPTS AND DISBURSEMENTS  
For a Political Committee Other Than an Authorized Committee

21 DEC 19 11:34

(Summary Page)

C99001174

1. Name of Committee (in Full)  
**THE SIMON COMMITTEE  
P.O.**

---

Address (Number and Street)  
**P.O. Box 5**

---

City, State and ZIP Code  
**BRYN ATHYN, PA, 19009**

Check if address is different than previously reported.

---

2. FEC Identification Number  
**C99001174**

---

3.  This committee qualified as a multicandidate committee during this Reporting Period on \_\_\_\_\_ (date)

4. TYPE OF REPORT (check appropriate box)

(a)  April 15 Quarterly Report  
 July 15 Quarterly Report  
 October 15 Quarterly Report  
 January 31 Year End Report  
 July 31 Mid Year Report (Non-election Year Only)  
 Monthly Report for \_\_\_\_\_  
 Twelfth day report preceding \_\_\_\_\_ (Type of Election) election on \_\_\_\_\_ in the State of \_\_\_\_\_  
 Thirtieth day report following the General Election on \_\_\_\_\_ in the State of \_\_\_\_\_  
 Termination Report

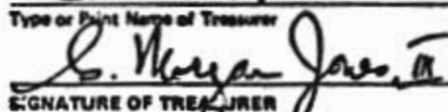
(b) Is this Report an Amendment?  
 YES  NO

SUMMARY

	Column A This Period	Column B Calendar Year-to-Date
5. Covering Period <b>Oct 1, 1980</b> Through <b>DEC 31, 1980</b>		<b>NEW COMMITTEE</b>
6. (a) Cash on Hand January 1, 1982 .....		\$ 0
(b) Cash on Hand at Beginning of Reporting Period .....	\$ 344.35	
(c) Total Receipts (from Line 18) .....	\$ 300.00	\$ 15,000.00
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B) .....	\$ 644.35	\$ 15,000.00
7. Total Disbursements (from Line 28) .....	\$ 585.90	\$ 14,621.65
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d)) ...	\$ 58.45	\$ 58.45
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D) .....	\$ 0	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D) .....	\$ 0	

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

For further information, contact:

**G. MORGAN JONES, III**  
 Type or Print Name of Treasurer  
  
 SIGNATURE OF TREASURER

Federal Election Commission  
 Toll Free 800-424-9530  
 Local 202-623-4068

**10-12-81**  
 Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

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

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FEC FORM 3X (3/80)

Attachment 1, pg. 4

1 82040344557  
91031994956

Name of Committee or Party  
**THE SIMON COMMITTEE**

Report Covering the Period  
From **DEC 1** To **DEC 31 1957**

**I. RECEIPTS**

	Column A Total This Period	Column B Calendar Year Total
<b>11. CONTRIBUTIONS (other than loans) FROM:</b>		
(a) Individuals/Persons Other Than Political Committees	300.00	15,080.00
Name Every Unitemized \$ _____		
(b) Political Party Committees		
(c) Other Political Committees		
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11a, 11b and 11c)	300.00	15,080.00
<b>12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES</b>		
<b>13. ALL LOANS RECEIVED</b>		
<b>14. LOAN REPAYMENTS RECEIVED</b>		
<b>15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)</b>		
<b>16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES</b>		
<b>17. OTHER RECEIPTS (Dividends, Interest, etc.)</b>		
<b>18. TOTAL RECEIPTS (Add 11d, 12, 13, 14, 15, 16 and 17)</b>	300.00	15,080.00

**II. DISBURSEMENTS**

<b>19. OPERATING EXPENDITURES</b>	585.90	14,621.65
<b>20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES</b>		
<b>21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES</b>		
<b>22. INDEPENDENT EXPENDITURES (Use Schedule E)</b>		
<b>23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. §441a(d)) (Use Schedule F)</b>		
<b>24. LOAN REPAYMENTS MADE</b>		
<b>25. LOANS MADE</b>		
<b>26. REFUNDS OF CONTRIBUTIONS TO:</b>		
(a) Individuals/Persons Other Than Political Committees		
(b) Political Party Committees		
(c) Other Political Committees		
(d) TOTAL CONTRIBUTION REFUNDS (add 26a, 26b and 26c)		
<b>27. OTHER DISBURSEMENTS</b>		
<b>28. TOTAL DISBURSEMENTS (Add Lines 19, 20, 21, 22, 23, 24, 25, 26d and 27)</b>	585.90	14,621.65

**III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES**

<b>29. TOTAL CONTRIBUTIONS (other than loans) from Line 11d</b>	300.00	15,080.00
<b>30. TOTAL CONTRIBUTION REFUNDS from Line 26d</b>	0	0
<b>31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from Line 29)</b>	300.00	15,080.00
<b>32. TOTAL OPERATING EXPENDITURES from Line 19</b>	585.90	14,621.65
<b>33. OFFSETS TO OPERATING EXPENDITURES from Line 15</b>	0	0
<b>34. NET OPERATING EXPENDITURES (subtract Line 33 from Line 32)</b>	585.90	14,621.65

Attachment 1, 19-5

81031991957



SCHEDULE A

INSTRUCTIONS FOR FILING SCHEDULE A  
ITEMIZED RECEIPTS

Part 1 of 1  
LINE NUMBER 12  
Use separate schedules for each  
activity of the District  
and Suburban Board

Any information copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in full)  
**THE SIMON COMMITTEE**

A. Full Name, Mailing Address and ZIP Code  
**GABRIELE P. PENNILETTA  
62 FLORE JENKINTOWN BLVD  
JENKINTOWN, PA, 19046**

Name of Employer  
**NONE**

Date (month, day, year)  
**10-6-80**

Amount of Each Receipt This Period  
**300.00**

Receipt For:  Primary  General  
 Other (specify): **MY BILLS**

Occupation  
**HOUSEWIFE**

Aggregate Year-to-Date-\$ **10,987.00**

B. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month, day, year)

Amount of Each Receipt This Period

Receipt For:  Primary  General  
 Other (specify):

Occupation

Aggregate Year-to-Date-\$

C. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month, day, year)

Amount of Each Receipt This Period

Receipt For:  Primary  General  
 Other (specify):

Occupation

Aggregate Year-to-Date-\$

D. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month, day, year)

Amount of Each Receipt This Period

Receipt For:  Primary  General  
 Other (specify):

Occupation

Aggregate Year-to-Date-\$

E. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month, day, year)

Amount of Each Receipt This Period

Receipt For:  Primary  General  
 Other (specify):

Occupation

Aggregate Year-to-Date-\$

F. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month, day, year)

Amount of Each Receipt This Period

Receipt For:  Primary  General  
 Other (specify):

Occupation

Aggregate Year-to-Date-\$

G. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month, day, year)

Amount of Each Receipt This Period

Receipt For:  Primary  General  
 Other (specify):

Occupation

Aggregate Year-to-Date-\$

SUBTOTAL of Receipts This Page (optional) .....

TOTAL This Period (last page this line number only) ..... **300.00**

Attachment 1, Pg. 6

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9  
5  
9  
3  
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1  
0  
1

SCHEDULE B

ITEMIZED DISBURSEMENTS

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)  
**THE SIMON COMMITTEE**

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
G. MORGAN JONES III HUNTINGDON VALLEY, PA, 19006	EXPENSE REIMBURSE- MENT Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): PAY BILLS	10.3.80	200.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
AMTRAK WASHINGTON DC 20024	RAIL FARE Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): RAIL TICKETS	10.8.80	40.50
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
AMTRAK WASHINGTON DC 20024	RAIL FARE Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): OTHER INFO.	10.23.80	40.50
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
BELL TELEPHONE / PA CONSHOHOCKEN PA, 19429	Telephone Exp. Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): PAY BILLS	11.15.80	148.90
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
G. MORGAN JONES III HUNTINGDON VALLEY PA 19006	EXP. REIMBURSEMENT Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): PAY BILLS	11.24.80	150.00
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
CONCORD NATIONAL BANK CONCORD, N.H. 03301	BANK CHARGES EXP. Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): BNL. ACCTS.	12.11.80	6.00
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
SUBTOTAL of Disbursements This Page (optional) .....			
TOTAL This Period (last page this line number only) .....			585.90

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Attachment, pp. 7

8

FOURTH QUARTER 1980 FEC REPT.

RECEIVED

A. Full Name, Mailing Address and ZIP Code of Loan Source		Original Amount of Loan	Completions Payments To Date	Balance Outstanding at Close of This Period
THE SIMON COMMITTEE MC3 GORRIE R. ATERNA BOX 508 CARLETON (FARGO) RD BRW ATHA, PA, 19009 Election: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): AMENARST		3500.00	0	3500.00
Terms: Date Inured <u>4-15-81</u> Date Due _____ Interest Rate _____ % (apr) <input type="checkbox"/> Secured				
List All Endorsers or Guarantors (if any) to Item A				
1. Full Name, Mailing Address and ZIP Code		Name of Employer		
		Occupation		
		Amount Guaranteed Outstanding: \$		
2. Full Name, Mailing Address and ZIP Code		Name of Employer		
		Occupation		
		Amount Guaranteed Outstanding: \$		
3. Full Name, Mailing Address and ZIP Code		Name of Employer		
		Occupation		
		Amount Guaranteed Outstanding: \$		
B. Full Name, Mailing Address and ZIP Code of Loan Source		Original Amount of Loan	Completions Payments To Date	Balance Outstanding at Close of This Period
Election: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):				
Terms: Date Inured _____ Date Due _____ Interest Rate _____ % (apr) <input type="checkbox"/> Secured				
List All Endorsers or Guarantors (if any) to Item B				
1. Full Name, Mailing Address and ZIP Code		Name of Employer		
		Occupation		
		Amount Guaranteed Outstanding: \$		
2. Full Name, Mailing Address and ZIP Code		Name of Employer		
		Occupation		
		Amount Guaranteed Outstanding: \$		
3. Full Name, Mailing Address and ZIP Code		Name of Employer		
		Occupation		
		Amount Guaranteed Outstanding: \$		
EUSTOTALS This Period This Page (optional) .....				
TOTALS This Period (last page in this line only) .....				3500.00

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Carry outstanding balances only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.

Attachment, P. 8



**REPORT OF RECEIPTS AND DISBURSEMENTS**  
For a Political Committee Other Than an Authorized Committee

1981 *Five*

01 OCT 19 11:00

(Summary Page)

<p><b>1. Name of Committee (in Full)</b> <b>THE SIMON COMMITTEE</b></p> <hr/> <p><b>Address (Number and Street)</b> <b>P.O. BOX "S"</b></p> <hr/> <p><b>City, State and ZIP Code</b> <b>BRYN ATHYN, PA, 19009</b></p> <hr/> <p><input type="checkbox"/> Check if address is different than previously reported.</p> <p><b>2. FEC Identification Number</b> <b>C 99001174</b></p> <p><b>3. <input type="checkbox"/> This committee qualified as a multi-candidate committee during this Reporting Period on _____ (date)</b></p>	<p><b>4. TYPE OF REPORT (check appropriate boxes)</b></p> <p>(a) <input type="checkbox"/> April 15 Quarterly Report  <input type="checkbox"/> July 15 Quarterly Report  <input type="checkbox"/> October 15 Quarterly Report  <input type="checkbox"/> January 31 Year End Report  <input type="checkbox"/> July 31 Mid Year Report (Non-election Year Only)  <input type="checkbox"/> Monthly Report for _____  <input type="checkbox"/> Twelfth day report preceding _____ (Type of election) election on _____ in the State of _____  <input type="checkbox"/> Thirtieth day report following the General Election on _____ in the State of _____</p> <p><input checked="" type="checkbox"/> Termination Report  <b>SPECIAL REPORT FOR F.E.C.</b></p> <p>(b) <input type="checkbox"/> Is this Report an Amendment?  <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</p>
---	--

SUMMARY		Column A This Period	Column B Calendar Year-to-Date
<b>5. Covering Period</b> <u>JAN 1, 1981</u> Through <u>OCT 12, 1981</u>			
<b>6. (a)</b> Cash on Hand January 1, 1981 .....		\$ 58.45	
<b>(b)</b> Cash on Hand at Beginning of Reporting Period .....		\$ 58.45	
<b>(c)</b> Total Receipts (from Line 18) .....		\$ 0	\$ 0
<b>(d)</b> Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B) .....		\$ 58.45	\$ 58.45
<b>7. Total Disbursements (from Line 28) .....</b>		\$ 67.00	\$ 67.00
<b>8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d)) .....</b>		\$ 0 (2.55)	\$ 0 (2.55)
<b>9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D) .....</b>		\$ 0	
<b>10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D) .....</b>		\$ 3502.55	

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

For further information, contact:

Federal Election Commission  
Toll Free 800-424-9630  
Local 202-623-4068

**G. MORGAN JONES, III**  
Type or Print Name of Treasurer

*G. Morgan Jones, III*      10.12.81  
SIGNATURE OF TREASURER      Date

**NOTE:** Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §427b.

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

	FEC FORM 3X (8/80)
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*Attachment, Pg. 9*

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9

DETAILED SUMMARY PAGE  
of Receipts and Disbursements  
Page 2, FEC FORM 204

Name of Committee on This Page: **THE SIMON COMMITTEE**  
Report Covering the Period: **Jan 1 to Oct 12, 1961**

**I. RECEIPTS**

**11. CONTRIBUTIONS (other than loans) FROM:**

- (a) Individuals/Persons Other Than Political Committees
- (b) Political Party Committees
- (c) Other Political Committees
- (d) TOTAL CONTRIBUTIONS (other than loans) (Add 11a, 11b and 11c)

**12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES**

**13. ALL LOANS RECEIVED**

**14. LOAN REPAYMENTS RECEIVED**

**15. OFFSETS TO OPERATING EXPENDITURES (Wages, Rent, etc.)**

**16. REFUNDS (a) CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES**

**17. OTHER RECEIPTS (Dividends, Interest, etc.)**

**18. TOTAL RECEIPTS (Add 11d, 12, 13, 14, 15, 16 and 17)**

**II. DISBURSEMENTS**

**19. OPERATING EXPENDITURES**

**20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES**

**21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES**

**22. INDEPENDENT EXPENDITURES (Use Schedule E)**

**23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. §441e(d)) (Use Schedule F)**

**24. LOAN REPAYMENTS MADE**

**25. LOANS MADE**

**26. REFUNDS OF CONTRIBUTIONS TO:**

- (a) Individuals/Persons Other Than Political Committees
- (b) Political Party Committees
- (c) Other Political Committees
- (d) TOTAL CONTRIBUTION REFUNDS (Add 26a, 26b and 26c)

**27. OTHER DISBURSEMENTS**

**28. TOTAL DISBURSEMENTS (Add Lines 19, 20, 21, 22, 23, 24, 25, 26d and 27)**

**III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES**

**29. TOTAL CONTRIBUTIONS (other than loans) from Line 11d**

**30. TOTAL CONTRIBUTION REFUNDS from Line 26d**

**31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)**

**32. TOTAL OPERATING EXPENDITURES from Line 19**

**33. OFFSETS TO OPERATING EXPENDITURES from Line 15**

**34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)**

	Column A Total This Period	Column B Calendar Year-to-Date
11d	0	0
12		
13		
14		
15		
16		
17		
18	0	0
19	67.00	67.00
20		
21		
22		
23		
24		
25		
26d		
27		
28	67.00	67.00
29		
30		
31		
32		
33		
34		

82040344563

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Attachment 1, 11/10

11

SCHEDULE A

A SCHEDULE A RETURN TO BE FILED WITH FORM 1040  
ITEMIZED RECEIPTS

Page 1 of 1  
LINE NUMBER 22-2  
Use separate schedules for each category of the Deductible Category Total

Any information omitted from such Returns or Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)  
**THE SIMON COMMITTEE**

A. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
<b>NONE</b>		Occupation		
		Aggregate Year-to-Date-\$		
		Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
B. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
		Occupation		
		Aggregate Year-to-Date-\$		
		Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
C. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
		Occupation		
		Aggregate Year-to-Date-\$		
		Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
D. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
		Occupation		
		Aggregate Year-to-Date-\$		
		Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
E. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
		Occupation		
		Aggregate Year-to-Date-\$		
		Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
F. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
		Occupation		
		Aggregate Year-to-Date-\$		
		Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
G. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
		Occupation		
		Aggregate Year-to-Date-\$		
		Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
SUBTOTAL of Receipts This Page (optional) .....				
TOTAL This Period (last page (this line number only) .....				0.

81031962

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Attachment 1, pg 11



SCHEDULE B

ITEMIZED DISBURSEMENTS

Page 1 of 1  
LINE NUMBER 29-28  
Use separate columns for each  
category of the Detailed  
Summary Page

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)  
**THE SIMON COMMITTEE**

A. Full Name, Mailing Address and ZIP Code <b>G. MORGAN JONES, III HAUTINGDON VALLEY PA 19006</b>	Purpose of Disbursement <b>EXPENSE REIMB.</b> Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify):	Date (month, day, year) <b>1-15-81</b>	Amount of Each Disbursement This Period <b>49.00</b>
--	---	---	---

B. Full Name, Mailing Address and ZIP Code <b>CONCORD NATIONAL BANK CONCORD NH 03301</b>	Purpose of Disbursement <b>BANK CHARGES</b> Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify):	Date (month, day, year) <b>10-12-87</b>	Amount of Each Disbursement This Period <b>17.00</b>
---	---	--	---

<del>C. Full Name, Mailing Address and ZIP Code</del>	<del>Purpose of Disbursement</del>	<del>Date (month, day, year)</del>	<del>Amount of Each Disbursement This Period</del>
---	------------------------------------	------------------------------------	--

<del>D. Full Name, Mailing Address and ZIP Code</del>	<del>Purpose of Disbursement</del>	<del>Date (month, day, year)</del>	<del>Amount of Each Disbursement This Period</del>
---	------------------------------------	------------------------------------	--

<del>E. Full Name, Mailing Address and ZIP Code</del>	<del>Purpose of Disbursement</del>	<del>Date (month, day, year)</del>	<del>Amount of Each Disbursement This Period</del>
---	------------------------------------	------------------------------------	--

<del>F. Full Name, Mailing Address and ZIP Code</del>	<del>Purpose of Disbursement</del>	<del>Date (month, day, year)</del>	<del>Amount of Each Disbursement This Period</del>
---	------------------------------------	------------------------------------	--

<del>G. Full Name, Mailing Address and ZIP Code</del>	<del>Purpose of Disbursement</del>	<del>Date (month, day, year)</del>	<del>Amount of Each Disbursement This Period</del>
---	------------------------------------	------------------------------------	--

<del>H. Full Name, Mailing Address and ZIP Code</del>	<del>Purpose of Disbursement</del>	<del>Date (month, day, year)</del>	<del>Amount of Each Disbursement This Period</del>
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<del>I. Full Name, Mailing Address and ZIP Code</del>	<del>Purpose of Disbursement</del>	<del>Date (month, day, year)</del>	<del>Amount of Each Disbursement This Period</del>
---	------------------------------------	------------------------------------	--

SUBTOTAL of Disbursements This Page (optional) .....

TOTAL This Period (last page this line number only) ..... **67.00**

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810:1994963

Attachment pg. 12

SCHEDULE C  
(Revised 3/80)

LOANS

Supp. 1 of 1 to  
Line 10000  
See instructions  
for filing requirements

Name of Committee, etc. Full			
<b>THE SIMON COMMITTEE</b>			
A. Full Name, Mailing Address and ZIP Code of Loan Source <b>MRS GABRIELE T. FANALETON 608 305 COHAN WOOD BRYN ATHYN, PA, 19009</b>		Original Amount of Loan <b>3500.00</b>	Balance Outstanding at Close of This Period <b>3500.00</b>
Election: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify): <b>1981 PEC</b>		Cumulative Payments To Date <b>0</b>	
Terms	Date Incurred <b>2-28-79</b>	Date Due	Interest Rate <b>14.5%</b> <input type="checkbox"/> Secured
List All Endorsers or Guarantors (if any) to Item A			
1. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding <b>0</b>	
2. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding <b>0</b>	
3. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding <b>0</b>	
B. Full Name, Mailing Address and ZIP Code of Loan Source		Original Amount of Loan	Balance Outstanding at Close of This Period
Election: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Cumulative Payments To Date	
Terms	Date Incurred	Date Due	Interest Rate <b>14.5%</b> <input type="checkbox"/> Secured
List All Endorsers or Guarantors (if any) to Item B			
1. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding <b>0</b>	
2. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding <b>0</b>	
3. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding <b>0</b>	
SUBTOTALS This Period This Page (optional) .....			
TOTALS This Period (last page in this line only) .....			<b>3500.00</b>
Carry outstanding balance only to LINE 2, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.			

7 82040344566

81031994954

Attachment 1, 1983



FEDERAL ELECTION COMMISSION

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

October 5, 1979

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

ADVISORY OPINION 1979-49

C. C. Clinkscales, III  
Treasurer  
Independent Campaign to Elect  
William E. Simon President  
777 14th Street, N.W. Suite 1300  
Washington, D.C. 20005

Dear Mr. Clinkscales:

This refers to your letter of August 22, 1979, in which you request an advisory opinion as treasurer of the Independent Campaign to Elect William E. Simon President ("the Committee") regarding the application of limits contained in the Federal Election Campaign Act of 1971, as amended ("the Act") and Commission regulations to contributions received and expenditures made by your committee.

In your request you state that the Committee is an unauthorized political committee supporting only William E. Simon and seeking to cause Mr. Simon to become an active candidate in the 1980 presidential election. If he does so, the Committee expects to terminate.

You state further that the Committee's efforts are now directed toward raising and expending funds to influence persons to "choose William E. Simon for President" in primaries in which the Committee enters his name as a ballot candidate or a write-in candidate.

Specifically, you ask for guidance on the following questions.

- (1) May the Independent Campaign to Elect William E. Simon President accept contributions in excess of \$1,000 but not more than \$5,000 per calendar year, from individual contributions or other political committees to be expended to publicize issues relating to the 1980 Presidential election and to cause William E. Simon to become a candidate for the Office of President?

Attachment 2, pg. 1



made by a person or political committee for a communication expressly advocating the election or defeat of a clearly identified candidate which is not made with the cooperation, or with the prior consent of, or in consultation with, or at the request or suggestion of, a candidate or any agent or authorized committees of a candidate; Expenditures made by the Committee may not be properly characterized as "independent expenditures" since Mr. Simon is not a candidate for nomination to the office of President. Nevertheless, as explained above, the expenditures are not subject to limitation. Neither are they subject to the reporting requirements of 2 U.S.C. §434(b)(13) which relate to independent expenditures of political committees. The other §434(b) reporting requirements for receipts and expenditures do apply to the Committee. See also 11 CFR 104.2(b).

The issues which you raise in your advisory opinion request have been addressed by the Commission in Advisory Opinion 1979-40, a copy of which is enclosed.

This response constitutes an advisory opinion concerning the application of a general rule of law stated in the Act, or prescribed as a Commission regulation to the specific factual situation set forth in your request. See 2 U.S.C. §437f.

Sincerely yours,

*Robert O. Tiernan*

Robert O. Tiernan  
Chairman for the  
Federal Election Commission

Enclosure (AO 1979-40)

*Attachment 2, 19.2*



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Joseph F. Shanahan  
Alexauken Creek Road  
RD 2  
Lambertville, New Jersey 08530

RE: MUR 1378  
The Simon Committee  
Gabriele Pitcairn Pendleton

Dear Mr. Shanahan:

On , 1982, the Commission determined there is probable cause to believe that your clients violated certain sections of the Federal Election Campaign Act of 1971, as amended, specifically 2 U.S.C. §§ 434(a)(4)(A)(i) and 441a and sections 104.11 and 104.12 of the Commission's Regulations.

The Commission has a duty to attempt to correct such violations for a period of thirty to ninety days by informal methods of conference, conciliation and persuasion, and by entering into a conciliation agreement. If we are unable to reach an agreement during that period, the Commission may institute civil suit in United States District Court and seek payment of a civil penalty.

We enclose conciliation agreements that this office is prepared to recommend to the Commission in settlement of this matter. If you agree with the provisions of the enclosed agreements, please sign and return them to the Commission within ten days. I will then recommend that the Commission approve the agreements.

If you have any questions or suggestions for changes in the enclosed conciliation agreements, please contact Marybeth Tarrant, the staff member assigned to this matter, at (202) 523-4529.

Sincerely,

Charles N. Steele  
General Counsel

Enclosure  
Conciliation Agreements

*Attachment 4, pg. 1*

02040344569

FEDERAL ELECTION COMMISSION  
WASHINGTON, DC 20463

DATE 12/15/81

Docket

FROM: Pat Bartanen

REMARKS:

Please file the attached in the  
proper MUR file.

MUR 1378

6204034570





FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

TO: Memorandum To The File  
FROM: Commissioner Frank P. Reiche  
DATE: December 10, 1981

On Thursday, December 10, 1981 at approximately 3:00 P.M., Morgan Jones, whom I had met at the Republican National Convention in 1980, arrived for an appointment. In making the appointment he had not mentioned any specific subject matter, but soon after his arrival he indicated an interest in discussing a pending MUR involving William E. Simon, whom he had supported for the Republican Presidential Nomination in 1980. I immediately informed him that we were prohibited by confidentiality provisions from discussing any current MURs. As a consequence, there was no further discussion of Mr. Simon's MUR, the balance of the appointment (approximately 15 minutes) being spent discussing the possible formation by Mr. Jones of a political study group in the Princeton, New Jersey area.

*Frank P. Reiche*  
\_\_\_\_\_  
Frank P. Reiche, Commissioner

62040344571

JOSEPH F. SHANAHAN  
ATTORNEY-AT-LAW

RECEIVED  
10/19/81  
81 OCT 15 12:00  
ALEXANDER GREEK ROAD  
RD 2, LAMBERTVILLE, N. J. 08850  
909-397-3100

13 October 1981

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

Dear Sir:

Re: MUR 1378

Relative to the above herewith is enclosed:

1. Original and nine copies of Brief of Simon Committee including Attachments A to K.
2. Original and nine copies of affidavit of G. Morgan Jones III.
- ~~3. Simon Committee Report for period Oct. 1, 1980 to Dec. 31, 1980. (Receipts and Disbursements)~~
- ~~4. Simon Committee Report (Receipts and Disbursements) for period Jan. 1, 1981 through October 12, 1981. (including Schedule C)~~
- ~~5. Schedule C Reports for four quarters of 1980.~~
6. Original and nine copies of errata sheet. (page 1 of Brief of Gabriele Pitcairn Pendleton) Would you kindly substitute same for page 1 of her Brief previously forwarded on September 1, 1981.

I regret that some unexpected business commitments of Mr. Jones delayed our consultations and resulted in this being forwarded a few days late.

Thank you for the past courtesies by the staff.

Very truly yours,

Joseph F. Shanahan

cc: Office of General Counsel  
with encl. (3)

Would you kindly acknowledge receipt for this on copy and return in stamped self addressed envelope enclosed for that purpose.

82040344572

16:00 9/3/81  
GENERAL COUNSEL  
RECEIVED

81 OCT 15 12:00

## BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of                    )  
 The Simon Committee                )            MUR 1378

## BRIEF OF SIMON COMMITTEE

I Statement of Facts

A. The present treasurer of the committee, G. Morgan Jones, III, having been unable to obtain any of the 1979 committee records from the then treasurer, C.C. Clinkscales, III, has no documentary information concerning that period, other than copies of the Reports of Receipts and Expenditures as furnished by the Federal Election Commission. (see accompanying affidavit)

B. Relevant information for the year 1980 and 1981 from Mr. Jones personal knowledge is included with that affidavit.

C. William E. Simon was never a candidate for the office of President of the United States having made a properly formal disavowal of such candidacy with the Federal Election Commission by letter dated 30 July 1979. (Att B) It was common knowledge through the news media that, not only was he not a candidate but was on the staff of another candidate. (Att C)

D. All expenditures made by the committee and contributions accepted by it were accomplished with the knowledge that Mr. Simon was not a candidate and with the sole objective of trying to convince him that he was a viable candidate. (Att D)

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SINCE THE SIMON COMMITTEE ACCEPTED DONATIONS AND MADE PURCHASES WHICH WERE EXCEPTED FROM THE DEFINITIONS OF "CONTRIBUTION" AND "EXPENDITURE" AS SET FORTH IN THE FEDERAL ELECTION COMMISSION'S BROCHURE ENTITLED "CAMPAIGN GUIDE FOR PRESIDENTIAL CANDIDATES AND THEIR COMMITTEES" IT IS NOT KNOWINGLY IN VIOLATION OF 2 U.S.C. § 441a(f)

Section 441 a (f) states as follows:

" No candidate or political committee shall knowingly accept any contribution or make any expenditure in violation of the provisions of this section. No officer or employee of a political committee shall knowingly accept a contribution made for the benefit or use of a candidate, or knowingly make any expenditure on behalf of a candidate, in violation of any limitation imposed on contributions and expenditures under this section."

(underline added)

\* On page 2 of the General Counsel's brief under Paragraph II he states:

" Section 441a(f) prohibits the acceptance of such excessive contributions."

which omits the element of "knowingly" as listed in the Code above.

On page 2 of the Campaign Guide brochure (AttE) it states in pertinent part:

" All information presented in this Guide is based on the Act and the FEC Regulations. Citations refer to sections of the FEC Regulations . ( See 11CFR Parts 100 through 115, and 9032 through 9038.)"

And it states in the Introduction of Appendix A on Definitions, on page 31 of the same brochure: (Att J)

" The following terms, as used in this Guide and defined under the Federal Election Campaign Act, have specific meanings.

(underline added)

On page 4 of the brochure, (Att G) under paragraph B (What is NOT a Campaign Contribution to the Campaign), it states under sub paragraph 4 in pertinent part:

4. Testing-the-Waters

Payments made to help an individual decide whether to become a candidate (such as payments for polling) are not contributions if the individual does not subsequently become a Presidential candidate. .... "

(underline added)

It also states at CFR 11 (Revised as of January 1, 1979) S. 100.4 under sub paragraph (b)(1) in pertinent part:

" (b) The term "contribution" does not include-  
(1) Payments made for the purpose of determining whether an individual should become a candidate, such as those incurred in conducting a poll, if the individual does not otherwise subsequently become a candidate." .....

On page 6 of the brochure, (Att H) under paragraph B (WHAT IS NOT A CAMPAIGN EXPENDITURE BY THE CAMPAIGN), it states under sub paragraph 3 in pertinent part:

3. Testing-the-Waters

Payments made to help an individual decide whether to become a candidate (such as payments for polling) are not expenditures if the individual does not subsequently become a candidate. .... "

(underlines added)

And it also states at CFR 11 (Revised as of January 1, 1979) S. 100.7 under sub paragraph (b)(2) in pertinent part:

(b) The term "expenditure" does not include-

(1) .....

(2) Payments made for the purpose of determining whether an individual should become a candidate, such as those incurred in conducting a poll, if the individual does not otherwise subsequently become a candidate. .... "

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According to the above stated exceptions to the "specific meaning" definition of "contribution" and "expenditure" as laid down in the Commission's Campaign Guide brochure and the C.F.R. it is clear that the committee did not "accept any contribution or make any expenditure" in violation of the Code because William E. Simon never became a candidate for President and the payments made were for the purpose of helping him to decide whether or not to become a candidate. He never did become a candidate under any of the four criteria listed on page 6. paragraph III, 1: (Att H)

1. He never qualified as a candidate on any State ballot. (see attached affidavit, par. 12)

2. The contributions or expenditures made came under the exception listed.

3. William E. Simon never authorized the committee to accept contributions or make expenditures on his behalf. (See affidavit, par. 12)

4. William E. Simon made proper disavowal to the Commission. (Att B)

When it is considered that, for the committee to be in violation of Section 441a(f) of the Code, ( as distinguished from the incomplete paraphrasing of it in both the General Counsel's Factual Basis and Legal Analysis dated May 8, 1981 and his Brief dated August 4, 1981 and concluding with his Recommendation #1 in both documents) it is necessary that it "... knowingly accept any contribution or make any expenditure in violation of the provisions of the section...", it is even clearer that no violation occurred, if indeed, any complete allegation to that effect has even been made by the General Counsel. His concluding Recommendation #1 of a finding of probable



cause that the committee violated 2 U.S.C. S. 441a(f) is without foundation since it lacks the essential element of "knowingly".

"Knowingly" means with knowledge of the essential facts. People v. McCalla, 63 Cal. App. 783, 220 P 436,439. In U.S. v. Evans 539 F 2d 244 (1977), under headnote 2, Fraud, at 245 it states:

" For purpose of proving that a defendant "knowingly" made a false, fictitious or fraudulent statement or representation in a matter within the jurisdiction of any department or agency of the United States , a person who makes a statement with reckless disregard of the truthfulness of the statement and with the conscious purpose to avoid learning the truthfulness of the statement may be deemed to have made the statement "knowingly". 18 U.S.C.A. S. 1001"

It is clear from the above that something more than just a mere recitation that reports showed that contributions were accepted and expenditures made is required to constitute a violation of the Code. The facts and the law, as stated by Mr. Jones in this Brief show that the committee, far from knowingly accepting and making forbidden payments believed that it was acting fully in compliance with the law as laid down in the Commission's own Guidelines.

#### CONCLUSION

As to Recommendation #1: ( 2 U.S.C. S. 441a(f) )

For the above reasons respondent committee contends that its actions relative to accepting contributions or making expenditures were in compliance with the Commission's own Guidelines and that there is no probable cause to believe that it violated the above section.

As to Recommendation #2 (U.S.C. S 434(a)94)(A)(1) )

For the reason stated in the affidavit of G. Morgan

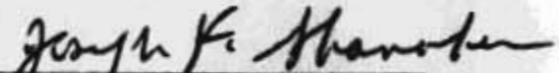
Jones and the action taken to comply with the above section, as stated in paragraph 9 of the affidavit, . . . respondent committee contends that there is no probable cause to believe that it violated the above section.

As to Recommendation #3: (11 C.F.R. S 104.11 )

For the reason stated in paragraph 10 of the affidavit and the action taken . . . to comply with the above section, respondent committee contends that there is no probable cause to believe that it violated the section.

As to Recommendation #4: ( 11 C.F.R. S. 104.12 )

For the reason stated and the stipulation made in paragraph 11 of the affidavit, respondent committee contends that there is no probable cause to believe that it violated the above section.



Joseph F. Shanahan  
RD 2 Lambertville, New Jersey 0853  
609-397-3158  
Attorney for respondent

Dated /3 October 1981

82040344578

ATTACHMENTS TO BRIEF

- Att A ..... Cover Sheet of Campaign Guide, October 1979
- Att B ..... Letter of disavowal dated 30 July 1979
- Att C ..... News Item, N.Y. Times Nov. 13, 1979
- Att D ..... News Item Manchester Union Leader, Aug. 23, 1979
- Att E ..... page 2 of Campaign Guide
- Att F ..... Letter of G.M. Jones, May 20, 1981
- Att G ..... Page 4 of Campaign Guide
- Att H ..... page 6 of Campaign Guide
- Att J ..... page 31 of Campaign Guide
- Att K ..... Letter of G.M. Jones, dated Aug. 21, 1981

02040344579





# CAMPAIGN GUIDE

## FOR PRESIDENTIAL CANDIDATES AND THEIR COMMITTEES

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

October, 1979

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WILLIAM E. SIMON  
100-1000  
1220 Avenue of the Americas  
New York, New York 10020

11:10  
LUCIEN  
C. WISSEN

ATT-B

79 JUL 10 PM 12:18

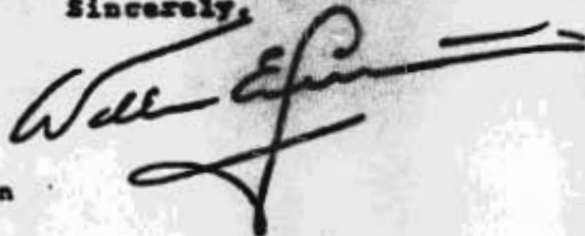
July 30, 1979

Gentlemen:

On July 20, 1979 I received a letter dated July 16 from your Staff Director, Mr. Orlando B. Potter, notifying me that a Statement of Organization was filed with the Federal Election Commission on July 6, 1979, by the "Independent Campaign to Elect William E. Simon President".

Pursuant to Section 100.2(c) of the Commission's regulations, 11 C.F.R. paragraph 100.2(c), I hereby disavow any activity on my behalf by the "Independent Campaign to Elect William E. Simon President".

Sincerely,



Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463  
att: Reports Analysis Division

IND. EYP

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ATT

# Confident Reagan to Announce Candidacy in New York Tonight

Continued From Page A1

primaries on the same day, March 28, the Reagan organizers plan to pour substantial sums into television advertising.

The other Republican candidates who are organizing in the area, Senator Howard H. Baker Jr., George Bush and John B. Connally, have shown no signs yet of breaking New York's uncommitted posture, although politicians suggested that Mr. Reagan's stance would force them to run pledged states, too.

In New Jersey, Mr. Bush and Mr. Baker have signed up some name politicians. Mr. Connally has done well with fund-raisers but not much with organization.

Connecticut politicians say that Mr. Bush, a native of the state, has strong local political ties.

## Announcement Is Tonight

Dramatizing his strength in this once-hostile area, which was closed to him when it was dominated by the late Gov. Nelson A. Rockefeller, Mr. Reagan will make his formal announcement of national candidacy at a dinner in the New York Hilton tonight.

He will come back on Thursday to display at a news conference in the Waldorf-Astoria some formidable support in the three-state area, which Mr. Stone indicated would include:

At least 20 of New York's 62 county chairmen, including those from Brooklyn, the Bronx and Erie.

A New York campaign structure headed by the former Westchester County chairman, James O'Rourke, and the former assistant minority leader of the State Assembly, Dominick L. DiCarlo of Brooklyn.

New Jersey's William E. Simon, former Secretary of the Treasury, and New York's Representative Jack F. Kemp as heads of national committees.



Associated Press  
Representative Jack Kemp

The voting rules differ in the three states, with New York voters picking named delegates directly, and Connecticut and New Jersey apportioning delegates — by means still to be determined — to match the percentage votes of the Presidential candidates.

## 'Party States' Sought

The New York party chairman, Dr. Bernard Kilbourn, has been trying to fashion "party states" that could go to the national convention and bargain as an uncommitted bloc.

Unless the party slate is for Mr. Reagan — as is likely to be the case in Brooklyn and the Bronx, for instance — the Reagan people expect to run their own.

"We've wooed Dr. Kilbourn and others for months," Mr. Stone said. "Now it's time for us to move."

George L. Clark Jr., the Brooklyn county leader, fought a lonely rear guard action for Mr. Reagan four years ago in a delegation that was almost totally in thrall to Mr. Rockefeller.

"This time, there's no question about it," he said. "He'll roll over New York."

The Bronx leader, John D. Calandra, had Mr. Reagan to his party dinner the other night. The Erie leader, Victor Farley, is expected to bring a dozen or so upstate leaders with him. In Connecticut, with 35 delegates, Mr. Stone said, "We've got the organizational strength."

Mr. Reagan's honorary state chairman is former Gov. John Davis Lodge, and his paid director is a political itinerant named Anthony J. Nania. Mr. Nania started out working for Allard K. Lowenstein, the maverick Democrat from New York, then was an advance man for Senator Eugene J. McCarthy in 1968 and Senator George McGovern in 1972.

## Odd Twist in Connecticut

The eight-region Connecticut organization, in an unusual twist, will have a structure based not on political boundary lines but on telephone exchanges.

New Jersey will not vote until June for its 66 or 67 Republican delegates. But observers say the state chairman, David Norcross, will have to move swiftly if he hopes to fashion the same sort of uncommitted slate run by party leaders that, in 1976, saw only three New Jerseyans stray to Mr. Reagan.

If the situation works out as Mr. Stone believes it will, the Reagan bandwagon will be in high gear by the time New Jersey votes. State leaders, he said, are "kidding themselves" if they think they can maintain an uncommitted posture into June.

Mr. Reagan has been seeking a New Jersey leader with roots in the party's moderate wing. His targets are, first, former Assembly Speaker Thomas H. Kean or, second, Mayor Lawrence F. Kramer of Paterson.

Although no members of the New Jersey state committee are expected to be



Associated Press  
William E. Simon

there when Mr. Reagan announces his metropolitan area support, he will have Mr. Simon who, along with Mr. Kemp, has hopes of being the nominee Mr. Reagan on a Reagan ticket.



ATT D

## Simon's Not a Candidate, Unless . . .

By CHRIS HERBERT  
Union Leader Staff

NEW YORK CITY — The nation's first "energy czar", William Simon, said yesterday that he doesn't want to be president but if a write-in campaign in the N.H. presidential primary is successful he would reconsider.

A write-in campaign for Simon as President in the primary was officially announced yesterday at a press conference in Concord.

If that campaign places him within the top three Republican candidates, Simon said "obviously, at that point, I would have to reconsider."

A former Secretary of the Treasury under Presidents Ford and Nixon, Simon is also the

author of the best-selling book "A Time for Truth," which outlines his free-market economic philosophy.

At this point, however, Simon said he is reluctant to enter the political arena because "I do not have the ability to dissemble."

Simon, who gained his understanding of economics as an investment banker in New York City, said "it's kind of sad" that more non-politicians do not run for office.

As for the issues in the campaign, however Simon agreed with his supporters in Concord that economics should have primary importance. "Every society that's allowed inflation to dominate them has been destroyed . . . It's the only issue."

Manchester Union Leader  
Manchester, N.H.  
Aug. 23, 1979

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ATTE

## INTRODUCTION

The Federal Election Campaign Act (the Act) requires Presidential candidates and political committees which support them to register and disclose their campaign receipts and expenditures and to abide by certain contribution limits and prohibitions. Moreover, if Presidential candidates except public funding for their primary and/or general election campaigns, they must abide by certain additional prohibitions and limitations on campaign receipts and expenditures.<sup>1</sup>

This Guide covers the basic requirements of the Act and Regulations, as they apply to all Presidential candidates (and their committees). Candidates who qualify, or think they might qualify, for public funding for the primary elections should give special attention to Chapter VIII.<sup>2</sup> NOTE: This Guide does not cover the special rules governing public funding for the general election and the national nominating conventions.

All information presented in this Guide is based on the Act and the FEC Regulations. Citations refer to sections of the FEC Regulations. (See 11 CFR Parts 100 through 115, and 9032 through 9038.) In the event of future changes in the Regulations, revised pages to this Guide will be available upon request and automatically distributed to all currently registered Presidential candidates and their committees. NOTE: Presidential candidates and their authorized committees should also consult the Federal Election Campaign Act, as amended, and the FEC Regulations and not rely solely on this Guide for guidance.

Before reading this Guide, candidates and committee staff should note the following suggestions:

- Review this Guide carefully. Note the definitions in Appendix A, which give special meanings to key words. Terms included in this Appendix are italicized and marked with an asterisk the first time they appear in the text.
- Keep good records of receipts and expenditures.
- If a mistake is discovered, correct it promptly and straightforwardly.

<sup>1</sup> See Appendix C, Chart on Public Funding Expenditure Limits.

<sup>2</sup> The matching payment program for Presidential primary elections is one of three accounts in the Presidential Election Campaign Fund, a program of public financing administered by the FEC. In addition to matching payments, the fund provides public grants to nominees in the general election and public grants to national party committees for their nominating conventions. See Presidential Election Campaign Fund in Appendix A definitions.

- If in doubt as to what the law means or how it applies to a specific situation, seek help from the FEC. Call toll free 800-424-9630 (or in Washington 202-693-9630) for routine assistance. For more complicated questions relating to a specific, factual situation, candidates, Federal officeholders and political committees may request an advisory opinion in writing. (See Appendix K for details on these and other FEC information programs.)

- When seeking more information, consult the Federal Election Campaign Act and the FEC Regulations. Note in particular the definitions (and their exceptions) given at the beginning of most sections of the Regulations. A detailed index accompanying the Regulations helps a reader quickly locate those provisions pertinent to a particular concern.

## BACKGROUND: UNDERSTANDING CONTRIBUTIONS AND EXPENDITURES

Under the Federal Election Campaign Act, the terms "contributions" and "expenditures" are essential to understanding the basic requirements of the Act:

- The receipt of "contributions" and the making of "expenditures" may, for example, determine whether an individual is a Presidential candidate<sup>3</sup> and thus is subject to the requirements of the Act.\*
- The receipt of "contributions" and the making of "expenditures" similarly determines whether a group is a political committee<sup>3</sup> and thus is subject to the Act's requirements.
- Moreover, "contributions" received and "expenditures" made must be reported by the Presidential candidate or his/her authorized committees.
- In addition, "contributions" may not exceed the prescribed dollar limits nor violate the prohibitions of the Act.
- Finally, if a Presidential candidate accepts public funds, the Act imposes limits on expenditures.<sup>3</sup>

To comply with the Act, therefore, one needs to know just exactly what is a "contribution" and what is an "expenditure." This section explains these terms, providing specific examples where helpful.

<sup>3</sup> See Appendix C, Chart on Public Funding Expenditure Limits.

\* See Definitions in Appendix A.

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~~Independent Committee to Elect~~

~~WILLIAM E. SIMON~~

~~President~~

THE SIMON COMMITTEE

Mrs. Gabrielle Pitcairn Pendleton, Chairman

Post Office Box "5"  
Bryn Athyn, Pennsylvania 19009  
(215) 947-2234

May 20, 1981

Federal Election Commission  
Attn: John Warren, Mc Garry Chairman  
Washington, D.C. 20463

Dear Mr. Mc Garry,

Thank you for yours of May 8, 1981.  
We have been in touch with your staff  
member Marybeth Turritt and are now  
preparing our response.

We would certainly hope that the  
Commission would not decide to take action  
against The Simon Committee and that we can  
adhere to your regulations to your satisfaction  
and consequently arrive at a satisfactory  
informal conciliation.

Sincerely,

G. Morgan Jones, III  
Treasurer.



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**II. Goods and Property**  
Office space and equipment, paper, membership lists offered or used commercially, airplane tickets.

**III. Payment of Campaign Bill**  
Payment of a campaign bill by an individual or organization other than the Presidential candidate or his/her authorized committees for personal campaign services of another. 100.4(a)(5).

**IV. Payment Made in Cooperation With Candidate**  
Any other expenditure a person makes which fails to qualify as an *independent expenditure*<sup>8</sup> because it is made in cooperation with or at the request or suggestion of a Presidential candidate or his/her authorized committees or agents. 100.1(a) and (c). For example, an expenditure for a billboard advertisement supporting a Presidential primary candidate counts as a contribution in-kind to the candidate if the individual paying for the ad asks the candidate where he wants the billboard placed. (See also "Special Party Expenditures," p. 10.)

**b. Value of Contributions In-Kind**

- i. Goods are valued at the ordinary market price.
- ii. Services are valued at the hourly or piecework rate when the individual performing the service is compensated by a person other than the Presidential candidate or his/her authorized committee(s).<sup>9</sup>

**NOTE:** When not compensated, such services are considered "voluntary activity" and do not count as contributions. See p. 13. 100.4(a)(1)(iii) and 100.4(b)(2).

**6. Sales and Mass Collections**  
Proceeds from mass collections (e.g., "pass-the-hat" activities at a large rally) or from the sale of tickets or items are contributions. The full purchase price of a ticket to a fundraising event or an item counts as a contribution. 100.4(a)(2).

**7. Written Contracts and Promises**  
A written contract, pledge or promise to make a contribution is considered a reportable contribution. 100.4(a)(3). If the promise is not fulfilled, the Presidential candidate or authorized committee must disclose its cancellation on the relevant report. 100.8(a).

**8. Transfer In**  
The receipt of funds transferred from another political committee counts as a contribution. 100.4(a)(4).

**B. WHAT IS NOT A CAMPAIGN CONTRIBUTION TO THE CAMPAIGN?**

Certain types of receipts do not count against contribution limits. In some instances, however, they must be reported by the Presidential candidate or the authorized committee(s). 100.4(b).

**1. Volunteer Activity**  
Certain types of volunteer activity do not count as contributions and need not be reported by the Presidential candidate or his/her authorized committee(s). (See pp. 8-9.)

**2. Legal and Accounting Services**  
Certain legal and accounting services rendered to a Presidential candidate or his/her authorized committee(s) solely to ensure compliance with the Act do not count as contributions but must be reported by the candidate or committee. (See also p. 10.)

**3. Bank Loan**  
A bank loan made directly to the candidate or authorized committee in accordance with applicable banking laws and in the ordinary course of business does not count as a contribution by the bank. It must, however, be reported by the Presidential candidate or his/her authorized committee(s). 100.4(b)(13).

**4. Testing-the-Waters**  
Payments made to help an individual decide whether to become a candidate (such as payments for polling) are not contributions if the individual does not subsequently become a Presidential candidate. If he or she does become a candidate, however, these payments count as contributions. In that case they become subject to the contribution limits and prohibitions and must be reported retroactively by the candidate. 100.4(b)(1). (See "Individual Becomes a Candidate," p. 8.)

**5. Honoraria**  
An honorarium paid to a Presidential candidate, who is also a Federal officeholder, for a speech, appearance or article, as well as reimbursed travel and subsistence costs and

<sup>8</sup> However, under certain circumstances, legal and accounting services can be rendered to a candidate or committee without counting as a contribution. See p. 10.

<sup>9</sup> See Definitions in Appendix A.

<sup>9</sup> Incumbent Senators or Representatives should also consult House and Senate rules.

ATT H



# STARTING THE CAMPAIGN

## B. WHAT IS NOT A CAMPAIGN EXPENDITURE BY THE CAMPAIGN?

Certain types of disbursements are not considered expenditures by the Presidential candidate (or his/her authorized committee(s)) and need not be reported by the candidate (or committee(s)), unless otherwise noted below:

1. **Volunteer Activity**  
Volunteer activities conducted in accordance with the rules described on pp. 8-9 are not expenditures.
2. **Candidate's Routine Expenses**  
Routine living expenses of the candidate paid by the candidate from personal funds are not expenditures. 100.7(b)(10).
3. **Testing-the-Waters**  
Payments made to help an individual decide whether to become a candidate (such as payments for polling) are not expenditures if the individual does not subsequently become a candidate. If he/she becomes a candidate, however, the payments count as expenditures and must be reported retroactively. 100.7(b)(2). (See "Individual Becomes a Candidate," p. 8, below.)
4. **Legal and Accounting Services**  
Certain legal and accounting services rendered to a candidate or his/her authorized committee(s) solely to ensure compliance with the Act are not considered campaign expenditures (but must be reported by the candidate or committee). 100.7(b)(15). (See p. 10.)
5. **Party Spending**  
Certain party expenditures made on behalf of a Presidential candidate in the general election by a national party committee (or its authorized agent) do not count as expenditures by the candidate, regardless of whether the candidate accepts public funding. These expenditures are reportable by the party committee - not the candidate. 110.7(a). (See "Special Party Expenditures," p. 10.)
6. **Independent Expenditures**  
"Independent expenditures" made by an individual or group on behalf of a Federal candidate do not count as expenditures by the candidate - as long as they are not made with the candidate's cooperation. 109.1(a) and 109.2. (See "Independent Expenditures," p. 9.)

## I. INDIVIDUAL BECOMES A CANDIDATE

An individual becomes a Presidential candidate (and thus triggers his/her registration and reporting obligations under the Act) when any one of the following circumstances occurs:

### A. QUALIFIES FOR STATE BALLOT

The individual takes action under State law to qualify for the ballot for nomination for election or election to the United States Presidency.

### B. RECEIVES CONTRIBUTIONS OR MAKES EXPENDITURES

The individual receives contributions or makes expenditures for the purpose of seeking nomination or election to the Presidency even if the intention to seek Federal office has not been publicly announced.

#### Exception: Testing-the-Waters

Note, however, that payments made to determine whether an individual should become a candidate, such as expenses for polling, do not alone trigger candidate status. Financial records of such activities should nevertheless be maintained because, if the beneficiary of such precandidacy activity later becomes a candidate, the payments are considered contributions (subject to the Act's limits and prohibitions) and/or expenditures and must be reported.<sup>10</sup> 100.4(b)(1) and 100.7(b)(2).

### C. AUTHORIZES CAMPAIGN ACTIVITY

The individual authorizes someone else to accept contributions or make expenditures on his/her behalf (except for "testing-the-waters" expenses).

### D. FAILS TO DISAVOW CAMPAIGN ACTIVITY

The individual fails to disavow unauthorized efforts to solicit contributions or make expenditures on his/her behalf within 30 days after being notified by the FEC of such activity. 100.2.

## II. CANDIDATES AND COMMITTEES MUST REGISTER

All forms for registration are available free from the Office of Public Communications, Federal Election Commission, 1325 K Street, N.W., Washington, D.C. 20463 or by calling toll free 800/424-9630.

<sup>10</sup> Testing-the-water expenditures must also be reported as qualified campaign expenses by primary candidates receiving matching payments. See p. 27.

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# A. APPENDIX ON DEFINITIONS

The following terms, as used in this Guide and defined under the Federal Election Campaign Act, have specific meanings.

**Act** - The Federal Election Campaign Act of 1971, as amended in 1974 and 1978. 100.20.

**Active Candidacy** - Status of a Presidential candidate who is actively seeking nomination to election in a Presidential election year. Principal factors by which the Commission may determine whether a Presidential candidate is actively seeking nomination include: 1) frequency and type of public appearances, speeches and advertisements made by the candidate; 2) the amount of campaign activity with respect to soliciting contributions or making campaign expenditures; 3) whether or not the candidate continues to employ campaign personnel or uses volunteers; and 4) whether or not the candidate releases committed delegates to his/her party's national nominating convention. 9033.5(e).

**Authorized Agent** - Any person who has been authorized to raise contributions or make expenditures on the candidate's behalf. (This term must be distinguished from the term "agent," as used in "Independent Expenditures." See Appendix D.)

**Authorized Committee** - Any political committee (including the principal campaign committee) which the candidate authorizes in writing to raise contributions or make expenditures on his/her behalf, or a political committee which, after actively supporting a candidate by raising or spending funds, is not disavowed by the candidate. 100.2(c) and 100.14(b)(1).

**Candidates** - A candidate for Federal office including the U.S. Senate, the U.S. House of Representatives, the Presidency and Vice-Presidency. 100.2. See also "Individual Becomes a Candidate," p. 6.

**Candidate Agreements** - The conditions which a Presidential candidate agrees to (in order to qualify for matching payments) and which he/she submits in written form to the FEC. 9033.1. (See pp. 24-25.)

**Certification** - 1) The process by which the FEC reviews and approves matchable contributions and directs the Treasury Department to disburse matching payments to eligible candidates. 26 U.S.C. §§ 9036 and 9037. (See p. 26.)

2) A written, signed statement to the FEC in which a Presidential candidate and his/her authorized committee(s) agree to comply with certain provisions of the Act and Regulations in order to establish eligibility for matching payments. 9033.2. (See p. 24.)

**Clearly Identified Candidate** - A candidate whose name, photograph or drawing appears (in communication) or whose identity is apparent from unambiguous reference. 100.1(b)(3).

**Contribution** - See p. 3.

**Election** - Any one of several elections held for Federal office, including a primary election, a run-off election, a party caucus or convention which has authority to select the nominee, a general election and a special election held to fill a vacant seat. 100.8.

**Expenditure** - See p. 5.

**Expenditure Limitations** - See p. 24 and chart on p. 35.

**General Party Expenditures** - Expenditures by a party committee which indirectly benefit Federal candidates, such as salary paid to the party committee's staff. As long as such expenditures do not provide direct support to a clearly identified candidate, they do not count against contribution or expenditure limits applicable to any specific candidate. (See "General Party Expenditures," p. 10.)

**Inactive Candidacy** - Status of a Presidential candidate who is not actively conducting a Presidential primary campaign in more than one State between March 1 and July 1 of a Presidential election year (9033.5); or who receives less than 10 percent of the popular vote for all Presidential candidates of the same party in two consecutive primaries (9033.4(b)). See definition of "Active Candidacy" above.

**Ineligibility Date** - The date on which a candidate's eligibility for matching payments is terminated by the Commission. See p. 28 and 9033.4 of the Regulations.

**Matching Payment Period** - The period beginning on January 1 of the Presidential election year and ending on either the date the candidate's party makes its nomination or, in the case of a political party that does not nominate by national convention, the last day of the last major party's nominating convention, whichever date comes first. 9032.6.

**Matching Payment Submissions** - Private contributions submitted by Presidential primary candidates or their authorized committee(s) to be matched with funds from the Presidential Primary Matching Account. The FEC will certify the first \$250 of proper contributions qualifying for matching payments. 9033.2(c).

**Matching Payments** - Public funds given to eligible Presidential primary candidates to match small contributions of money from private contributors. Matching payments are certified by the FEC and disbursed by the U.S. Treasury Department. 9032.5.

**Memo Entry** - Supplemental data on a reporting schedule for which the dollar amount is not incorporated in the total figures for the cash balance, receipts or expenditures.

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Morgan

ATT K.

August 21, 1981

Charles N. Stebbins Esq.  
General Counsel  
Federal Election Commission  
Washington D.C. 20463

Dear Mr Stebbins,

RE. MOR 1378

Thank you for your letter of August 7, 1981 which was received by Mrs Keckleton as signed for August 18, 1981.

The Simon Committee has engaged counsel, Joseph F. Shanahan, Esq.  
RO # 2  
Lambertville, New Jersey and please be assured that within 15 days a brief putting forth our position will be filed. We thank you for all assistance in putting this matter to rest pleasantly.

Sincerely,  
S. Morgan Jones III  
Treasurer  
The Simon Committee  
P.O. Box 5 Bryn Athyn, Pa. 19001

cc. Mrs Gabrielle P. Pendleton  
Joseph F. Shanahan, Esq.

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
The Simon Committee ) MUR 1378

AFFIDAVIT  
New Jersey  
STATE OF PENNSYLVANIA  
COUNTY OF HUNTERDON

ss:

G. Morgan Jones, III of full age being duly sworn according to law, upon his oath deposes and says:

1. I reside at P.O. Box 5 Bryn Athyn, Pennsylvania 19009 and am the treasurer of the above committee.

2. In such office and in the making of necessary reports to the Federal Election Commission I have been guided by a brochure secured from the Commission entitled "Campaign Guide for Presidential Candidates and Their Committees" dated October 1979 and communications with the Commission.

3. On December 11, 1979, at the direction of the National Chairman of the above committee, Gabriele Pitcairn Pendleton, I assumed the office of National Campaign Director and relieved the then director and treasurer, C.C. Clinkscales III and transferred the address of the committee headquarters from Washington, D.C. to Bryn Athyn, Pennsylvania.

4. At that time, Mr. Clinkscales did not turn over the records of the committee, including any reports he may have made to the Commission but promised to forward same to me. After several requests he made it clear that he was not going to forward them and I was forced to seek copies of them (reports) from the Commission which did send me copies of the committee reports of receipts and expenditures for the year 1979.

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5. The 1980 Reports of the committee were filed by me ( first three quarters) based on the information available to me at the times.

6. Your letter dated May 8,1981 relative to MUR 1378 and enclosing General Counsel's Factual and Legal Analysis Procedures was received by me on May 14,1981 and answered by my letter of May 20,1981. (Att F )

7. Your letter (the Commission's) dated August 7,1981 relative to MUR 1378 and enclosing General Counsel's brief was received by me and answered by my letter of August 21,1981.(Att K)

8. As to Point One of MUR 1378 list of alleged violations by the committee, its legal argument is set forth in an accompanying brief.

9. As to Point Two ( U.S.C. S 434(a)(4)(A)(1) reports for the first three quarters of 1980 have been submitted to the Commission and a year end report for 1980 is hereby enclosed, together with such other reports as should bring them up to the present date.

10. As to Point Three (C.F.R. S. 104.11) it is to be noted that the \$3500.00 loan is carried as outstanding on the additional reports of the committee hereby enclosed. Supplementary Schedule C's to include the said loan and to be attached to the 1980 reports already made. Information concerning the loan was not known to the undersigned as stated in 3.-4. above.

11. As to Point Four (C.F.R. S. 104.12), similarly to Point Three, the undersigned was without knowledge as to the source of the \$300.00 as listed in the first report in 1979 (dated June 29) and assumed that it must have been a clerical error on the part of the reporter. Subsequently, the General Counsel's analysis dated May 8, 1981 states as follows at page 2, note 1/:

" It thus appears that the \$600.00 in contributions



reported by Mrs Fendleton on her filing in April were contributions to the committee and therefore, she is the source of the \$300 cash on hand. Apparently, \$300 was spent out of the \$600 originally contributed."

The undersigned agrees with such conclusion of the General Counsel and hereby stipulates that such must have been the source of the \$300 in question and makes such disclosure as required by 11 C.F.R. S. 104.12.

12. As National Director of the Committee, the undersigned has personal knowledge that William E. Simon never qualified as a candidate on any State ballot. He further states that he was never authorized to accept contributions or make expenditures on behalf of William E. Simon (except in the testing-the-waters sense) and knows of no other person so authorized.

13. In conclusion, The undersigned states that he has answered all communications from the Commission, has tried to comply with the spirit and letter of the Federal Election Law in executing the committee's reports and has not knowingly violated any of the specific sections of the law as listed in the General Counsel's brief. It was his belief that his duty to report had been concluded with the nomination of a Presidential candidate in July 1980.

*G. Morgan Jones III*  
G. Morgan Jones III

Sworn and subscribed to

before me this 12 day of October 1981

*Joseph F. Alvarado*  
Attorney at Law, State of New Jersey

81 OCT 15 PM 12:00

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
Gabriele Pitcairn Pendleton ) MUR 1378

BRIEF OF RESPONDENT

I Statement of Facts

A. In respect to her association with the "Independent Campaign to Elect William E. Simon President, Gabriele Pitcairn Pendleton (respondent) was guided in the matter of donations to it by a brochure secured from the Federal Election Commission entitled "Campaign Guide for Presidential Candidates and Their Committees" dated October 1979. (Att A)

B. William E. Simon was never a candidate for the office of President of the United States having made a properly formal disavowal of such candidacy with the Commission by letter dated 30 July 1979. Att B) It was common knowledge through the news media that, not only was he not a candidate, but was on the staff of another candidate. (Att C)

C. The donations made by respondent to the Independent Campaign to Elect William E. Simon were made with the knowledge that Mr. Simon was not a candidate and with the sole objective of trying to convince him that he was a viable candidate. They were also made with the knowledge that such was the objective of the committee.

\* These and other facts stated in the brief can be corroborated with affidavit of G. Morgan Jones attached to brief of Simon Committee, also listed under MUR1378

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J. F. SHANAHAN  
ALEXAUKEN CREEK ROAD  
LAMBERTVILLE, N. J. 08530

2:15-12:00



TRENTON, NJ  
OCT 13  
PM  
1981

TRENTON, NJ  
OCT 13  
PM  
1981

TRENTON, NJ  
OCT 13  
PM  
1981

SCOTT E. THOMAS - ESQ

ASSISTANT GENERAL COUNSEL

FEDERAL ELECTION COMMISSION  
1325 K ST. N.W.  
WASHINGTON, D.C.

20463





FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

September 23, 1981

Joseph F. Shanahan  
Alexauken Creek Road  
RD 2  
Lambertville, New Jersey 08530

Re: MUR 1378

Dear Mr. Shanahan:

Pursuant to your telephone conversation of this date with Marybeth Tarrant of this office, enclosed is a copy of the General Counsel's Brief regarding The Simon Committee.

Should you wish to respond to this brief, please do so in writing within 5 days of receipt of this letter. If you have any questions, please contact Ms. Tarrant at (202)523-4529.

Sincerely,

Scott E. Thomas  
Assistant General Counsel

Enclosure

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JOSEPH F. SHANAHAN  
ATTORNEY-AT-LAW

1079  
RECEIVED  
666-5408  
81 SEP 8 10:28  
ALEXANDER BREEK ROAD  
RD 2, LAMBERTVILLE, N. J. 08850  
609-397-0100

1 September 1981

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

Dear Sir:

Re: MUR 1378  
Gabriele Fitzcarrin Pendleton

Herewith is enclosed the following documents  
with respect to the above matter:

Original and nine copies of respondent's brief  
including Attachments A to J.

Very truly yours,  
*Joseph F. Shanahan*  
Joseph F. Shanahan

cc: Office of General Counsel (3)  
Mrs. Pendleton

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RECEIVED  
OFFICE OF THE  
GENERAL COUNSEL

BEFORE THE FEDERAL ELECTION COMMISSION  
31 AUGUST 1981

In the Matter of )  
Gabriele Pitcairn Pendleton ) MUR 1378

BRIEF OF RESPONDENT

I Statement of Facts

A. In respect to her association with the "Independent Campaign to Elect William E. Simon President, Gabriele Pitcairn Pendleton (respondent) was guided in the matter of donations to it by a brochure secured from the Federal Election Commission entitled "Campaign Guide for Presidential Candidates and Their Committees" dated October 1979. (Att A)

B. William E. Simon was never a candidate for the office of President of the United States having made a properly formal disavowal of such candidacy with the Commission by letter dated 30 July 1979. (Att B) It was common knowledge through the news media that, not only was he not a candidate, but was on the staff of another candidate. (Att C)

C. The total expenditures made by the Independent Campaign to Elect William E. Simon were made with the knowledge that Mr. Simon was not a candidate and with the sole objective of trying to convince him that he was a viable candidate, and apparently without success. (Att D)

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Argument

SINCE RESPONDENT WAS MAKING HER DONATIONS IN ACCORDANCE WITH THE RULES AND DEFINITIONS AS LAID DOWN IN THE COMMISSION'S "CAMPAIGN GUIDE FOR PRESIDENTIAL CANDIDATES AND THEIR COMMITTEES", SHE IS NOT IN VIOLATION OF 2U.S.C. § 441a(a)(1)(C)

Section 441a states in pertinent part:

" (a)(1) No person shall make contributions

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(C) to any other political committee in any calendar year which, in the aggregate, exceed \$5,000."

(underline added)

On page 2 of the Campaign Guide brochure (Att E) it states in pertinent part:

" All information presented in this Guide is based on the Act and the FEC Regulations. Citations refer to sections of the FEC Regulations. (See 11CFR Parts 100 through 115, and 9032 through 9038.)"

On page 3 of the brochure (Att F) under paragraph II Contributions it states as follows:

"A. WHAT IS A CAMPAIGN CONTRIBUTION TO THE CAMPAIGN?

A campaign contribution is anything of value given to (or provided on behalf of) a Presidential candidate, or one of his / her authorized committees or an authorized agent to influence the candidate's nomination or election to Federal office. 100.4 "

On page 4 of the brochure (Att G) under paragraph B. What is Not a Campaign Contribution to the Campaign?, it states as follows:

1. ---
2. ---
3. --
4. Testing-the Waters  
Payments made to help an individual decide whether to become a candidate (such as payments for polling) are not contributions if

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the individual does not subsequently become a Presidential candidate. If he or she does become a candidate, however, these payments count as contributions. ...."

It states in the introduction of Appendix A on Definitions on page 31: (Att J)

" The following terms, as used in this Guide and defined under the Federal Election Campaign Act, have specific meanings.

(underline added)

Therefore, according to the definition of what a "contribution" is, as laid down in paragraph II A. of the Guide, (Att F) it is clear that the donations made by respondent were not "contributions" in the technical sense of the Act because Mr. Simon was not a Presidential candidate nor was the group an authorized committee or agent. And Mr. Simon never became a candidate under the criteria listed on page 6 of the brochure under paragraph I of Part III (Individual Becomes a Candidate), (Att H) because A) he never qualified for a state ballot, B) Contributions made on his behalf came under the testing-the-waters exception, C) he never authorized any campaign activity and D) he made proper disavowal of campaign activity.

This is further verified by the definition of "What is Not a Campaign Contribution" as laid down in paragraph II B 4. (Att G) ie. "Testing the Waters, Payments made to help an individual decide whether to become a candidate (such as payments for polling) are not contributions if the individual does not subsequently become a Presidential candidate." The total of all payments in behalf of Mr. Simon, which never culminated in his becoming a candidate, were well known to the respondent as group chairman to have been made in trying to convince him to become a candidate (AttD) and therefore came within

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the "acting attorney" exception.

**CONCLUSION**

For the above reasons respondent contends that her actions relative to her donations to the Simon Committee were in conformity with the Commission's own guidelines as established in their Campaign Guide and that there is no probable cause to believe that she violated 2 U.S.C. § 441a (a)(1)(C).

*Joseph F. Shanahan*

Joseph F. Shanahan  
RD 2 Lambertville, New Jersey 08530  
609-397-3158  
Attorney for respondent

Date / September 1981

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ATTACHMENTS TO BRIEF

- Att A ..... Cover Sheet of Campaign Guide, October 1979
- Att B ..... Letter of disavowal dated 30 July 1979
- Att C ..... News item, N.Y. Times November 13, 1979
- Att D ..... News item, Manchester Union Leader August 23, 1979
- Att E ..... page 2 of Campaign Guide
- Att F ..... page 3 of Campaign Guide
- Att G ..... Page 4 of Campaign Guide
- Att H ..... page 6 of Campaign Guide
- Att J ..... page 31 of Campaign Guide

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ATT A



# CAMPAIGN GUIDE

## FOR PRESIDENTIAL CANDIDATES AND THEIR COMMITTEES

Federal Election Commission, 1100 L Street, N.W., Washington, D.C. 20543

October, 1979

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William E. Simon  
20th Floor  
1201 Avenue of the Americas  
New York, New York 10020

ATT-B

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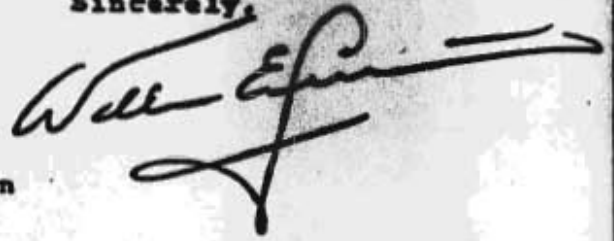
July 30, 1979

Gentlemen:

On July 20, 1979 I received a letter dated July 16 from your Staff Director, Mr. Orlando B. Petter, notifying me that a Statement of Organization was filed with the Federal Election Commission on July 6, 1979, by the "Independent Campaign to Elect William E. Simon President".

Pursuant to Section 100.2(c) of the Commission's regulations, 11 C.F.R. paragraph 100.2(c), I hereby disavow any activity on my behalf by the "Independent Campaign to Elect William E. Simon President".

Sincerely,



Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463  
att: Reports Analysis Division

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BTTC

# Confident Reagan to Announce Candidacy in New York Tonight

Continued From Page A1

primaries on the same day, March 23, the Reagan organizers plan to pour substantial sums into television advertising.

The other Republican candidates who are organizing in the area, Senator Howard H. Baker Jr., George Bush and John B. Connally, have shown no signs yet of breaking New York's uncommitted posture, although politicians suggested that Mr. Reagan's stance would force them to run pledged states, too.

In New Jersey, Mr. Bush and Mr. Baker have signed up some name politicians. Mr. Connally has done well with fund-raisers but not much with organization.

Connecticut politicians say that Mr. Bush, a native of the state, has strong local political ties.

### Announcement Is Tonight

Dramatizing his strength in this once-hostile area, which was closed to him when it was dominated by the late Gov. Nelson A. Rockefeller, Mr. Reagan will make his formal announcement of national candidacy at a dinner in the New York Hilton tonight.

He will come back on Thursday to display at a news conference in the Waldorf-Astoria some formidable support in the three-state area, which Mr. Stone indicated would include:

At least 20 of New York's 62 county chairmen, including those from Brooklyn, the Bronx and Erie.

A New York campaign structure headed by the former Westchester County chairman, James O'Rourke, and the former assistant minority leader of the State Assembly, Dominick L. DiCarlo of Brooklyn.

New Jersey's William E. Simon, former Secretary of the Treasury, and New York's Representative Jack F. Kemp as heads of national committees.



Representative Jack Kemp

The voting rules differ in the three states, with New York voters picking named delegates directly, and Connecticut and New Jersey appointing delegates — by means still to be determined — to match the percentage votes of the Presidential candidates.

### 'Party States' Sought

The New York party chairman, Dr. Bernard Kilbourn, has been trying to fashion "party states" that could go to the national convention and bargain as an uncommitted bloc.

Unless the party state is for Mr. Reagan — as is likely to be the case in Brooklyn and the Bronx, for instance — the Reagan people expect to run their own.

"We've wooed Dr. Kilbourn and others for months," Mr. Stone said. "Now it's time for us to move."

George L. Clark Jr., the Brooklyn county leader, fought a lonely rear guard action for Mr. Reagan four years ago in a delegation that was almost totally in thrall to Mr. Rockefeller.

"This time, there's no question about it," he said. "He'll roll over New York."

The Bronx leader, John D. Calandra, had Mr. Reagan to his party dinner the other night. The Erie leader, Victor Farley, is expected to bring a dozen or so upstate leaders with him. In Connecticut, with 25 delegates, Mr. Stone said, "We've got the organizational strength."

Mr. Reagan's honorary state chairman is former Gov. John Davis Lodge, and his paid director is a political itinerant named Anthony J. Nania. Mr. Nania started out working for Allard K. Lowenstein, the maverick Democrat from New York, then was an advance man for Senator Eugene J. McCarthy in 1968 and Senator George McGovern in 1972.

### Odd Twist in Connecticut

The eight-region Connecticut organization, in an unusual twist, will have a structure based not on political boundary lines but on telephone exchanges.

New Jersey will not vote until June for its 66 or 67 Republican delegates. But observers say the state chairman, David Norcross, will have to move swiftly if he hopes to fashion the same sort of uncommitted slate run by party leaders that, in 1976, saw only three New Jerseyans stray to Mr. Reagan.

If the situation works out as Mr. Stone believes it will, the Reagan bandwagon will be in high gear by the time New Jersey votes. State leaders, he said, are "kidding themselves" if they think they can maintain an uncommitted posture into June.

Mr. Reagan has been seeking a New Jersey leader with roots in the party's moderate wing. His targets are, first, former Assembly Speaker Thomas H. Kenn or, second, Mayor Lawrence F. Kramer of Paterson.

Although no members of the New Jersey state committee are expected to be



William E. Simon

there when Mr. Reagan announces his metropolitan area support, he will have Mr. Simon who, along with Mr. Kemp, has hopes of being the national Mr. Reagan President on a Reagan ticket.

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Att D

# Simon's Not a Candidate, Unless . . .

By CHRIS HERBERT  
Union Leader Staff

NEW YORK CITY — The nation's first "energy czar", William Simon, said yesterday that he doesn't want to be president but if a write-in campaign in the N.H. presidential primary is successful he would reconsider.

A write-in campaign for Simon as President in the primary was officially announced yesterday at a press conference in Concord.

If that campaign places him within the top three Republican candidates, Simon said "obviously, at that point, I would have to reconsider."

A former Secretary of the Treasury under Presidents Ford and Nixon, Simon is also the

author of the best-selling book "A Time for Truth," which outlines his free-market economic philosophy.

At this point, however, Simon said he is reluctant to enter the political arena because "I do not have the ability to dissuade."

Simon, who gained his understanding of economics as an investment banker in New York City, said "it's kind of sad" that more non-politicians do not run for office.

As for the issues in the campaign, however Simon agreed with his supporters in Concord that economics should have primary importance. "Every society that's allowed inflation to dominate them has been destroyed . . . It's the only issue."

Manchester Union Leader  
Manchester, N.H.  
Aug. 23, 1979

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# INTRODUCTION

The Federal Election Campaign Act (the Act) requires Presidential candidates and political committees which support them to register and disclose their campaign receipts and expenditures and to abide by certain contribution limits and prohibitions. Moreover, if Presidential candidates accept public funding for their primary and/or general election campaigns, they must abide by certain additional prohibitions and limitations on campaign receipts and expenditures.<sup>1</sup>

This Guide covers the basic requirements of the Act and Regulations, as they apply to all Presidential candidates (and their committees). Candidates who qualify, or think they might qualify, for public funding for the primary elections should give special attention to Chapter VIII.<sup>2</sup> NOTE: This Guide does not cover the special rules governing public funding for the general election and the national nominating conventions.

All information presented in this Guide is based on the Act and the FEC Regulations. Citations refer to sections of the FEC Regulations. (See 11 CFR Parts 100 through 115, and 9032 through 9038.) In the event of future changes in the Regulations, revised pages to this Guide will be available upon request and automatically distributed to all currently registered Presidential candidates and their committees. NOTE: Presidential candidates and their authorized committees should also consult the Federal Election Campaign Act, as amended, and the FEC Regulations and not rely solely on this Guide for guidance.

Before reading this Guide, candidates and committee staff should note the following suggestions:

- Review this Guide carefully. Note the definitions in Appendix A, which give special meanings to key words. Terms included in this Appendix are italicized and marked with an asterisk the first time they appear in the text.
- Keep good records of receipts and expenditures.
- If a mistake is discovered, correct it promptly and straightforwardly.

<sup>1</sup> See Appendix C, Chart on Public Funding Expenditure Limits.

<sup>2</sup> The matching payment program for Presidential primary elections is one of three accounts in the Presidential Election Campaign Fund, a program of public financing administered by the FEC. In addition to matching payments, the fund provides public grants to nominees in the general election and public grants to national party committees for their nominating conventions. See *Presidential Election Campaign Fund* in Appendix A definitions.

- If in doubt as to what the law means or how it applies to a specific situation, seek help from the FEC. Call toll free 800-424-9630 (or in Washington 202-4088) for routine assistance. For more complicated questions relating to a specific, factual situation, candidates, Federal officeholders and political committees may request an advisory opinion in writing. (See Appendix K for details on these and other FEC information programs.)

- When seeking more information, consult the Federal Election Campaign Act and the FEC Regulations. Note in particular the definitions (and their exceptions) given at the beginning of most sections of the Regulations. A detailed index accompanying the Regulations helps a reader quickly locate those provisions pertinent to a particular concern.

# BACKGROUND: UNDERSTANDING CONTRIBUTIONS AND EXPENDITURES

Under the Federal Election Campaign Act, the terms "contributions" and "expenditures" are essential to understanding the basic requirements of the Act:

- The receipt of "contributions" and the making of "expenditures" may, for example, determine whether an individual is a Presidential candidate<sup>4</sup> and thus is subject to the requirements of the Act.<sup>5</sup>
- The receipt of "contributions" and the making of "expenditures" similarly determines whether a group is a political committee<sup>6</sup> and thus is subject to the Act's requirements.
- Moreover, "contributions" received and "expenditures" made must be reported by the Presidential candidate or his/her authorized committees.
- In addition, "contributions" may not exceed the prescribed dollar limits nor violate the prohibitions of the Act.
- Finally, if a Presidential candidate accepts public funds, the Act imposes limits on expenditures.<sup>3</sup>

To comply with the Act, therefore, one needs to know just exactly what is a "contribution" and what is an "expenditure." This section explains these terms, providing specific examples where helpful.

<sup>3</sup> See Appendix C, Chart on Public Funding Expenditure Limits.

<sup>4</sup> See Definitions in Appendix A.

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## I. BASIC DISTINCTION BETWEEN CONTRIBUTIONS AND EXPENDITURES

The Act makes a basic distinction between contributions and expenditures. A contribution is one way individuals and groups may provide support to a Presidential candidate. A contribution usually involves the giving of money, goods or services to a campaign or the giving of money to political committees which, in turn, make contributions to the Presidential candidates of their choice.

An expenditure is not the same as a contribution. It usually represents the utilization of contributions received by a Presidential candidate or a political committee. Thus, candidates and their authorized committees conduct campaigns by expending the resources which have been contributed to them.

Contributions to Presidential candidates and their committees are subject to certain limits and prohibitions under the Act. By contrast, Presidential candidates and their committees may make unlimited expenditures.<sup>4</sup>

All Presidential candidates and their principal campaign committees are required to file reports of campaign contributions and expenditures.<sup>5</sup>

## II. CONTRIBUTIONS

### A. WHAT IS A CAMPAIGN CONTRIBUTION TO THE CAMPAIGN?

A campaign contribution is anything of value given to (or provided on behalf of) a Presidential candidate, or one of his/her authorized committees<sup>6</sup> or an authorized agent<sup>7</sup> to influence the candidate's nomination or election to Federal office. 100.4.

Campaign contributions<sup>8</sup> are reportable by the Presidential candidate (or his/her committee(s)) and are subject to the Act's dollar limits.<sup>9</sup> Separate dollar limits apply to contributions received in primary elections and in a general election. (For purposes of determining contribution limits, all primary elections held during an election year count as a single election.)

<sup>4</sup> Expenditures by Presidential candidates who accept public funding for their primary campaigns are, however, subject to dollar limits. Moreover, Presidential candidates who accept public funding for their general election campaigns may accept no private contributions.

<sup>5</sup> Candidates who accept public funding must also file reports on the receipt and expenditure of public funds.

<sup>6</sup> Contributions submitted by Presidential primary candidates for matching payments are subject to certain additional requirements spelled out in Section 9034.2 of the Regulations. See p. 25.

<sup>7</sup> See pp. 14-21 for reporting requirements, and pp. 8, 34 for limits and prohibitions on contributions.

<sup>8</sup> See Definitions in Appendix A.

### 1. A Gift of Money

A gift of money can be made by check or cash (i.e., currency). Cash contributions, however, are limited to \$100 per person per election. (See p. 8.)

### 2. A Loan

A loan is considered a contribution to the extent of the outstanding balance. Thus, an individual's loan, when added to other contributions from the same lender, may not exceed \$1,000 per election. Once repaid in full, a loan no longer counts against a contributor's limit.

If, for example, a Presidential candidate repays \$500 of a \$1,000 loan, he/she could borrow up to \$500 from the same person again. The creditor could contribute an additional \$500.

Bank loans, however, made according to applicable banking laws and in the ordinary course of business are not considered contributions by the bank (but still must be reported as a receipt by the Presidential candidate or his/her committee(s)). 100.4(a)(1) and 100.4(b)(13).

### 3. Endorsements and Guarantees of Loans

An endorsement or guarantee of a bank loan counts as a contribution to the extent of the outstanding balance of the bank loan. Once a loan is repaid, that portion of the loan endorsed or guaranteed by each endorser or guarantor no longer counts against his/her contribution limit. 100.4(b)(13).

### 4. Extension of Credit

The extension of credit beyond normal business practice counts as a contribution. To avoid making such a contribution, a creditor must make a commercially reasonable attempt to collect the campaign debt. 100.4(a)(6). (See "Cautionary Note: Unpaid Debts May Become Contributions," p. 22.)

### 5. In-Kind Contributions

Services, goods and property offered to or provided on behalf of a Presidential candidate (or his/her authorized committee(s)) are considered in-kind contributions. They are subject to the same limits and reporting requirements as any other type of contribution. 100.4(a)(1)(iii).

#### a. Examples

##### I. Services

Consultant services, such as preparation of advertising media, analysis of past election behavior, polling or get-out-the-vote organization; printing services; certain travel expenses.

ATT 6.

**II. Goods and Property**  
Office space and equipment, travel, membership lists offered or used commercially, airplane tickets.

**III. Payment of Campaign Bill**  
Payment of a campaign bill by an individual or organization other than the Presidential candidate or his/her authorized committee for personal campaign services of another. 100.4(a)(5).

**iv. Payment Made in Cooperation With Candidate**

Any other expenditure a person makes which fails to qualify as an *independent expenditure*<sup>8</sup> because it is made in cooperation with or at the request or suggestion of a Presidential candidate or his/her authorized committee or agents. 100.1(a) and (c). For example, an expenditure for a billboard advertisement supporting a Presidential primary candidate counts as a contribution in-kind to the candidate if the individual paying for the ad asks the candidate where he wants the billboard placed. (See also "Special Party Expenditures," p. 10.)

**b. Value of Contributions In-Kind**

- i. Goods are valued at the ordinary market price.
- ii. Services are valued at the hourly or piecework rate when the individual performing the service is compensated by a person other than the Presidential candidate or his/her authorized committee(s).<sup>9</sup>

**NOTE:** When not compensated, such services are considered "voluntary activity" and do not count as contributions. See p. 13. 100.4(a)(1)(iii) and 100.4(b)(2).

**6. Sales and Mass Collections**

Proceeds from mass collections (e.g., "pass-the-hat" activities at a large rally) or from the sale of tickets or items are contributions. The full purchase price of a ticket to a fundraising event or an item counts as a contribution. 100.4(a)(2).

**7. Written Contracts and Promises**

A written contract, pledge or promise to make a contribution is considered a reportable contribution. 100.4(a)(3). If the promise is not fulfilled, the Presidential candidate or authorized committee must disclose its cancellation on the relevant report. 104.8(a).

**8. Transfer In**

The receipt of funds transferred from another political committee counts as a contribution. 100.4(a)(4).

**B. WHAT IS NOT A CAMPAIGN CONTRIBUTION TO THE CAMPAIGN?**

Certain types of receipts do not count against contribution limits. In some instances, however, they must be reported by the Presidential candidate or the authorized committee(s). 100.4(b).

**1. Volunteer Activity**

Certain types of volunteer activity do not count as contributions and need not be reported by the Presidential candidate or his/her authorized committee(s). (See pp. 8-9.)

**2. Legal and Accounting Services**

Certain legal and accounting services rendered to a Presidential candidate or his/her authorized committee(s) solely to ensure compliance with the Act do not count as contributions but must be reported by the candidate or committee. (See also p. 10.)

**3. Bank Loan**

A bank loan made directly to the candidate or authorized committee in accordance with applicable banking laws and in the ordinary course of business does not count as a contribution by the bank. It must, however, be reported by the Presidential candidate or his/her authorized committee(s). 100.4(b)(13).

**4. Testing-the-Waters**

Payments made to help an individual decide whether to become a candidate (such as payments for polling) are not contributions if the individual does not subsequently become a Presidential candidate. If he or she does become a candidate, however, these payments count as contributions. In that case they become subject to the contribution limits and prohibitions and must be reported retroactively by the candidate. 100.4(b)(1). (See "Individual Becomes a Candidate," p. 8.)

**5. Honoraria<sup>9</sup>**

An honorarium paid to a Presidential candidate, who is also a Federal officeholder, for a speech, appearance or article, as well as reimbursed travel and subsistence costs and

<sup>8</sup>However, under certain circumstances, legal and accounting services can be rendered to a candidate or committee without counting as a contribution. See p. 10.

<sup>9</sup>See Definitions in Appendix A.

<sup>9</sup>Incumbent Senators or Representatives should also consult House and Senate rules.

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**E. WHAT IS NOT A CAMPAIGN EXPENDITURE BY THE CAMPAIGN?**

Certain types of disbursements are not considered expenditures by the Presidential candidate (or his/her authorized committee(s)) and need not be reported by the candidate (or committee(s)), unless otherwise noted below:

1. **Volunteer Activity**  
Volunteer activities conducted in accordance with the rules described on pp. 5-9 are not expenditures.
2. **Candidate's Routine Expenses**  
Routine living expenses of the candidate paid by the candidate from personal funds are not expenditures. 100.7(b)(10).
3. **Testing-the-Waters**  
Payments made to help an individual decide whether to become a candidate (such as payments for polling) are not expenditures if the individual does not subsequently become a candidate. If he/she becomes a candidate, however, the payments count as expenditures and must be reported retroactively. 100.7(b)(2). (See "Individual Becomes a Candidate," p. 6, below.)
4. **Legal and Accounting Services**  
Certain legal and accounting services rendered to a candidate or his/her authorized committee(s) solely to ensure compliance with the Act are not considered campaign expenditures (but must be reported by the candidate or committee). 100.7(b)(15). (See p. 10.)
5. **Party Spending**  
Certain party expenditures made on behalf of a Presidential candidate in the general election by a national party committee (or its authorized agent) do not count as expenditures by the candidate, regardless of whether the candidate accepts public funding. These expenditures are reportable by the party committee - not the candidate. 110.7(a). (See "Special Party Expenditures," p. 10.)
6. **Independent Expenditures**  
"Independent expenditures" made by an individual or group on behalf of a Federal candidate do not count as expenditures by the candidate - as long as they are not made with the candidate's cooperation. 109.1(a) and 109.2. (See "Independent Expenditures," p. 9.)



**STARTING THE CAMPAIGN**

**I. INDIVIDUAL BECOMES A CANDIDATE**

An individual becomes a Presidential candidate (and thus triggers his/her registration and reporting obligations under the Act) when any one of the following circumstances occurs:

**A. QUALIFIES FOR STATE BALLOT**

The individual takes action under State law to qualify for the ballot for nomination for election or election to the United States Presidency.

**B. RECEIVES CONTRIBUTIONS OR MAKES EXPENDITURES**

The individual receives contributions or makes expenditures for the purpose of seeking nomination or election to the Presidency even if the intention to seek Federal office has not been publicly announced.

**Exception: Testing-the-Waters**

Note, however, that payments made to determine whether an individual should become a candidate, such as expenses for polling, do not alone trigger candidate status. Financial records of such activities should nevertheless be maintained because, if the beneficiary of such precandidacy activity later becomes a candidate, the payments are considered contributions (subject to the Act's limits and prohibitions) and/or expenditures and must be reported.<sup>10</sup> 100.4(b)(1) and 100.7(b)(2).

**C. AUTHORIZES CAMPAIGN ACTIVITY**

The individual authorizes someone else to accept contributions or make expenditures on his/her behalf (except for "testing-the-waters" expenses).

**D. FAILS TO DISAVOW CAMPAIGN ACTIVITY**

The individual fails to disavow unauthorized efforts to solicit contributions or make expenditures on his/her behalf within 30 days after being notified by the FEC of such activity. 100.2.

**II. CANDIDATES AND COMMITTEES MUST REGISTER**

All forms for registration are available free from the Office of Public Communications, Federal Election Commission, 1325 K Street, N.W., Washington, D.C. 20463 or by calling toll free 800/424-9630.

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<sup>10</sup>Testing-the-water expenditures must also be reported as qualified campaign expenses by primary candidates receiving matching payments. See p. 27.



# A APPENDIX ON DEFINITIONS

The following terms, as used in this Guide and defined under the Federal Election Campaign Act, have specific meanings.

**Act** - The Federal Election Campaign Act of 1971, as amended in 1974 and 1976. 100.20.

**Active Candidacy** - Status of a Presidential candidate who is actively seeking nomination to election in a Presidential election year. Principal factors by which the Commission may determine whether a Presidential candidate is actively seeking nomination include: 1) frequency and type of public appearances, speeches and advertisements made by the candidate; 2) the amount of campaign activity with respect to soliciting contributions or making campaign expenditures; 3) whether or not the candidate continues to employ campaign personnel or uses volunteers; and 4) whether or not the candidate releases committed delegates to his/her party's national nominating convention. 9033.5(e).

**Authorized Agent** - Any person who has been authorized to raise contributions or make expenditures on the candidate's behalf. (This term must be distinguished from the term "agent," as used in "Independent Expenditures." See Appendix D.)

**Authorized Committee** - Any political committee (including the principal campaign committee) which the candidate authorizes in writing to raise contributions or make expenditures on his/her behalf, or a political committee which, after actively supporting a candidate by raising or spending funds, is not disavowed by the candidate. 100.2(c) and 100.14(b)(1).

**Candidate** - A candidate for Federal office including the U.S. Senate, the U.S. House of Representatives, the Presidency and Vice-Presidency. 100.2. See also "Individual Becomes a Candidate," p. 6.

**Candidate Agreements** - The conditions which a Presidential candidate agrees to (in order to qualify for matching payments) and which he/she submits in written form to the FEC. 9033.1. (See pp. 24-25.)

**Certification** - 1) The process by which the FEC reviews and approves matchable contributions and directs the Treasury Department to disburse matching payments to eligible candidates. 26 U.S.C. §§ 9036 and 9037. (See p. 26.)

2) A written, signed statement to the FEC in which a Presidential candidate and his/her authorized committee(s) agree to comply with certain provisions of the Act and Regulations in order to establish eligibility for matching payments. 9033.2. (See p. 24.)

**Clearly Identified Candidate** - A candidate whose name, photograph or drawing appears (in communications) or whose identity is apparent from unambiguous reference. 100.1(b)(3).

**Contribution** - See p. 3.

**Election** - Any one of several elections held for Federal office, including a primary election, a run-off election, a party caucus or convention which has authority to select the nominee, a general election and a special election held to fill a vacant seat. 100.6.

**Expenditure** - See p. 5.

**Expenditure Limitations** - See p. 24 and chart on p. 36.

**General Party Expenditures** - Expenditures by a party committee which indirectly benefit Federal candidates, such as salary paid to the party committee's staff. As long as such expenditures do not provide direct support to a clearly identified candidate, they do not count against contribution or expenditure limits applicable to any specific candidate. (See "General Party Expenditures," p. 10.)

**Inactive Candidacy** - Status of a Presidential candidate who is not actively conducting a Presidential primary campaign in more than one State between March 1 and July 1 of a Presidential election year (9033.5); or who receives less than 10 percent of the popular vote for all Presidential candidates of the same party in two consecutive primaries (9033.4(b)). See definition of "Active Candidacy" above.

**Ineligibility Date** - The date on which a candidate's eligibility for matching payments is terminated by the Commission. See p. 28 and 9033.4 of the Regulations.

**Matching Payment Period** - The period beginning on January 1 of the Presidential election year and ending on either the date the candidate's party makes its nomination or, in the case of a political party that does not nominate by national convention, the last day of the last major party's nominating convention, whichever date comes first. 9032.6.

**Matching Payment Submissions** - Private contributions submitted by Presidential primary candidates or their authorized committee(s) to be matched with funds from the Presidential Primary Matching Account. The FEC will certify the first \$250 of proper contributions qualifying for matching payments. 9033.2(c).

**Matching Payments** - Public funds given to eligible Presidential primary candidates to match small contributions of money from private contributors. Matching payments are certified by the FEC and disbursed by the U.S. Treasury Department. 9032.5.

**Memo Entry** - Supplemental data on a reporting schedule for which the dollar amount is not incorporated in the total figures for the cash balance, receipts or expenditures.

0204034610

U. F. SHANAHAN  
ALEXAUKEN CREEK ROAD  
LAMBERTVILLE, N. J. 08530

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POSTAGE

~~CHARLES Steele, Esq., General Counsel~~  
Federal Election Commission  
1325 K Street N.W.  
Washington, D.C.

20463



FIRST CLASS

RECEIVED  
GENERAL COUNSEL

August 21, 1981

Charles N. Steele Esq.  
General Counsel  
Federal Election Commission  
Washington DC 20463

Tarrant

Dear Mr Steele,

RE: MOR 1378

Thank you for your letter of August 7, 1981 which was received by Mrs Keelton as signed for August 18, 1981.

The Simon Committee has engaged counsel, Joseph F. Shanahan, Esq.

RD # 2

Lambertville, New Jersey and

please be assured that within 15 days a brief putting forth our position will be filed. We thank you for all assistance in putting this matter to rest pleasantly.

Sincerely,

S. Wayne Jones, III  
Treasurer  
The Simon Committee  
P.O. Box 5 Bryn Athyn Pa. 19009

cc. Mrs Gabrielle P. Pandita  
Joseph F. Shanahan, Esq.

204044



Morgan Jones  
The Simon Committee  
P.O. Box 5.  
Bryn Athyn, Pa, 19009

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FIRST CLASS

Charles N. Steele, Esq.  
General Counsel  
Federal Election Commission  
Washington D.C. 20463.

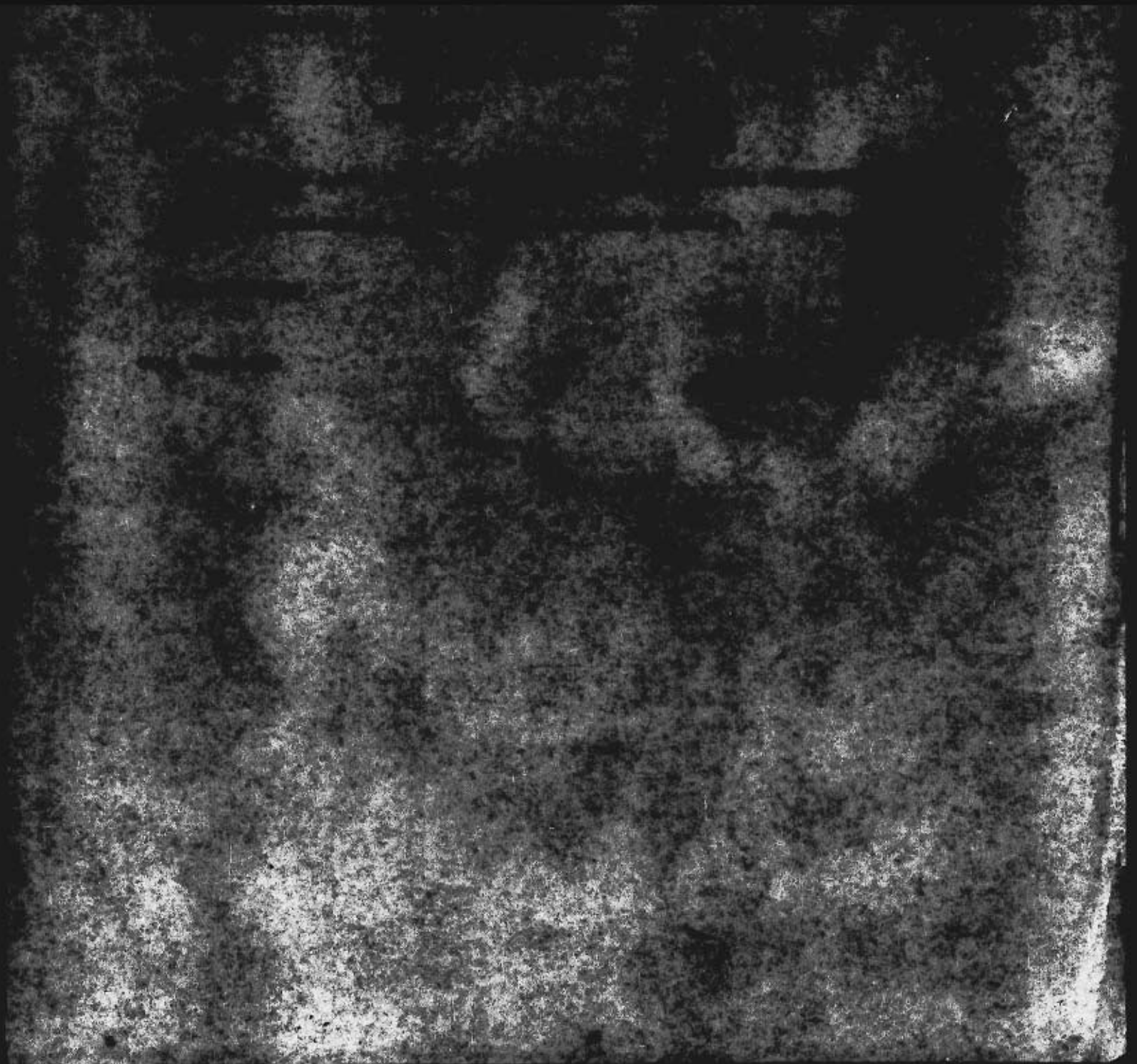
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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RECEIVED  
OFFICE OF THE  
COMMISSION SECRETARY

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August 7, 1981

MEMORANDUM TO: The Commission

FROM: Charles N. Steele  
General Counsel *CS*

SUBJECT: MUR 1378

Attached for the Commission's review are briefs stating the position of the General Counsel on the legal and factual issues of the above-captioned matter. Copies of the briefs and letters notifying the respondents of the General Counsel's intent to recommend to the Commission a finding of probable cause to believe were mailed on August 7, 1981. Following receipt of the Respondents' replies to this notice, this Office will make a further report to the Commission.

Attachments

1. Briefs
2. Letters to Respondents

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BEFORE THE FEDERAL ELECTION COMMISSION  
July 16, 1981

In the Matter of )  
The Simon Committee ) MUR 1378

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

The Simon Committee (the Committee) was referred to the Office of General Counsel by the Reports Analysis Division for receipt of excessive contributions from Mrs. Gabriele Pitcairn Pendleton in violation of 2 U.S.C. § 441a(f). On May 6, 1981, the Commission found reason to believe that the Committee had violated 2 U.S.C. §§ 434(a)(4)(A)(i) and 441a(f) and 11 C.F.R. §§ 104.11 and 104.12. Letters, enclosing the General Counsel's Factual and Legal Anaylsis, were sent to the respondents on May 8, 1981. On May 15, 1981, G. Morgan Jones, III, treasurer of the Committee, called and stated that he assumed Mrs. Pendleton did make all the contributions in question (Mr. Jones became treasurer in March, 1980) but that the Committee had no money to refund the excessive amounts. He further stated that he would file a written response shortly. On May 21, 1981, this office received a letter from Mr. Jones which explained the Committee was in the process of preparing a response. As yet, no response has been received and several phone calls to Mr. Jones have been unsuccessful in reaching him. Therefore, absent a response from the Committee, the facts in this matter remain unchanged.

According to the Committee's reports, Mrs. Pendleton exceeded her contribution limit in 1979 by \$4,951.50 and in 1980

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by \$4,887. In addition, the Committee failed to 1) file a 1980 Year End Report, 2) continuously report an outstanding loan of \$3,500 owed to Mrs. Pendleton and 3) disclose the source of its beginning cash on hand at the time of registration.

## II. Legal Analysis

2 U.S.C. § 441a(a)(1)(C) prohibits any person from making contributions to any other political committee (i.e. not an authorized candidate committee or a committee maintained and established by a national political party) in any calendar year which, in the aggregate, exceed \$5,000. Section 441a(f) prohibits the acceptance of such excessive contributions. Pursuant to section 431(8)(A)(1) (formerly section 431(a)(1)), the term "contribution" includes a loan. Pursuant to 11 C.F.R. § 100.7(a)(1)(i)(B):

A loan is a contribution at the time it is made and is a contribution to the extent that it remains unpaid. The aggregate amount loaned to a ... committee by a contributor when added to other contributions from that individual to that ... committee, shall not exceed the contribution limitations set forth at 11 C.F.R. Part 110.

From the reports filed by the Committee, it appears Mrs. Pendleton exceeded her limit in 1979 by \$4,951.50 and in 1980 by \$4,887. Thus, the General Counsel recommends that the Commission find probable cause to believe that the Committee violated 2 U.S.C. § 441a(f).

2 U.S.C. § 434(a)(4)(A)(i) requires all political committees other than authorized committees of a candidate to file quarterly reports in an election year. As the Committee has not filed a

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Year End Report for 1980 and has not terminated its reporting obligations, the General Counsel recommends that the Commission find probable cause to believe the Committee violated 2 U.S.C. § 434(a)(4)(A)(i).

11 C.F.R. § 104.11 requires all outstanding debts and obligations owed by a political committee to be continuously reported until extinguished. As there is no evidence that the \$3,500 loan to Mrs. Pendleton has been repaid, the General Counsel recommends that the Commission find probable cause to believe the Committee violated 11 C.F.R. § 104.11 for failing to continuously report this debt.

11 C.F.R. § 104.12 (formerly section 104.10) requires all political committees which have cash on hand at the time of registration to disclose the source of such funds. As the Committee never reported the source of its beginning balance of \$300, it has not complied with this requirement. Accordingly, the General Counsel recommends that the Commission find probable cause to believe the Committee violated 11 C.F.R. § 104.12.

General Counsel's Recommendations

1. Find probable cause to believe that The Simon Committee violated 2 U.S.C. § 441a(f).
2. Find probable cause to believe that The Simon Committee violated 2 U.S.C. § 434(a)(4)(A)(i).
3. Find probable cause to believe that The Simon Committee


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violated 11 C.F.R. § 104.11.

4. Find probable cause to believe that The Simon Committee  
violated 11 C.F.R. § 104.12.

17 August 1954  
Date

  
\_\_\_\_\_  
Charles N. Steele  
General Counsel

62040344619

BEFORE THE FEDERAL ELECTION COMMISSION  
July 16, 1981

In the Matter of )  
Gabriele Pitcairn Pendleton ) MUR 1378

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

The Simon Committee (the Committee) was referred to the Office of General Counsel by the Reports Analysis Division for receipt of excessive contributions from Gabriele Pitcairn Pendleton. According to the Committee's reports, Mrs. Pendleton contributed \$9,951 to the Committee in 1979 and \$9,887 in 1980. On May 6, 1981, the Commission found reason to believe that Mrs. Pendleton had violated 2 U.S.C. § 441a(a)(1)(C). On May 8, 1981, a letter, enclosing the General Counsel's Factual and Legal Analysis, was sent to the respondent. As yet, no response has been received. Absent a response from Mrs. Pendleton, the facts in this matter remain unchanged.

II. Legal Analysis

2 U.S.C. § 441a(a)(1)(C) prohibits any person from making contributions to any other political committee (i.e. not an authorized candidate committee or a committee maintained and established by a national political party) in any calendar year which, in the aggregate, exceed \$5,000. From the reports filed by the Committee, it appears Mrs. Pendleton exceeded her limit in 1979 by \$4,951.50 and in 1980 by \$4,887.

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Therefore, the General Counsel recommends that the Commission find probable cause to believe that Mrs. Pendleton violated 2 U.S.C. § 441a(a)(1)(C).

General Counsel's Recommendation

Find probable cause to believe that Gabriele Pitcairn Pendleton violated 2 U.S.C. § 441a(a)(1)(C).

\_\_\_\_\_  
Date

\_\_\_\_\_  
Charles N. Steele  
General Counsel

02040344621





FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Attachment 2

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

G. Morgan Jones, III, Treasurer  
The Simon Committee  
P.O. Box 5  
Bryn Athyn, Pennsylvania 19009

Re: MUR 1378

Dear Mr. Jones:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, and information supplied by your committee, the Federal Election Commission, on May 6, 1981, found reason to believe that your committee had violated sections 434(a)(4)(A)(i) and 441a(f) of the Federal Election Campaign Act of 1971, as amended, and sections 104.11 and 104.12 of the Commission's regulations and instituted an investigation of this matter.

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

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

If you are unable to file a responsive brief within 15 days, you may submit a written request to the Commission for an extension of time in which to file a brief. The Commission will not grant any extensions beyond 20 days.

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Letter to: G. Morgan Jones, III,  
Page 2

A finding of probable cause to believe requires that the Office of General Counsel attempt for a period of not less than thirty, but not more than ninety days to settle this matter through a conciliation agreement.

Should you have any questions, please contact Marybeth Tarrant at 202-523-4175.

Sincerely,

Charles N. Steele  
General Counsel

Enclosure  
Brief

82040344623

8-17-81

<input type="checkbox"/>	1. The following information is requested:
<input type="checkbox"/>	How to obtain and date delivered
<input type="checkbox"/>	Date received, date and address of delivery
<input type="checkbox"/>	RECEIVED DELIVERY
<input type="checkbox"/>	Date received and date delivered
<input type="checkbox"/>	RECEIVED DELIVERY
<input type="checkbox"/>	Date received, date, and address of delivery

2. To: G. Morgan Jones, III  
P.O. Box 51  
Bryan, Texas, 77801

3. (Always check division or office)

I have checked the serial description.

4. 8-22-81

5. ADDRESS CHANGE ONLY IF APPLICABLE

6. UNABLE TO DELIVER REASON:

8-7-81

BRYAN TEXAS  
1981



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Gabriele Pitcairn Pendleton  
Jenkintown Plaza  
6th Floor  
Jenkintown, Pennsylvania 19046

Re: MUR 1378

Dear Mrs. Pendleton:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, and information supplied by The Simon Committee, the Federal Election Commission, on May 6, 1981, found reason to believe that you had violated section 441a(a)(1)(C) of the Federal Election Campaign Act of 1971, as amended, and instituted an investigation of this matter.

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

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

If you are unable to file a responsive brief within 15 days, you may submit a written request to the Commission for an extension of time in which to file a brief. The Commission will not grant any extensions beyond 20 days.

A finding of probable cause to believe requires that the Office of General Counsel attempt for a period of not less than thirty, but not more than ninety days to settle this matter through a conciliation agreement.

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Letter to: Gabriele Pitcairn Pendleton  
Page 2

Should you have any questions, please contact Marybeth  
Tarrant at 202-523-4175.

Sincerely,

Charles N. Steele  
General Counsel

Enclosure  
Brief

82040344625

*MR*

1. The following information is required for delivery: <input type="checkbox"/> Name of addressee <input type="checkbox"/> Street address <input type="checkbox"/> City <input type="checkbox"/> State <input type="checkbox"/> ZIP code <input type="checkbox"/> Daytime telephone number <input type="checkbox"/> Recipient's signature	
2. ADDRESS ONLY <i>Gabriele Pitcairn Pendleton Pendleton 6th Floor</i>	
3. ARTICLES CONTAINED NUMBER OF ARTICLES <i>1</i>	
4. I have notified the addressee of this delivery. Signature: <i>C. N. Steele</i>	
5. ADDRESS CHANGE ONLY <i>FC</i>	
6. UNABLE TO DELIVER REASON <i>8-17-51</i>	

8-17-51



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE  
FROM: MARJORIE W. EMMONS/JODY CUSTER *jc*  
DATE: MAY 21, 1981  
SUBJECT: REFERRAL OF LETTER REGARDING THE SIMON COMMITTEE

The attached letter regarding the Simon Committee was received in Chairman McGarry's office and then forwarded to the Secretary of the Commission. It is provided for your action.

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Attachment:

Letter from G. Morgan Jones, III  
Dated May 20, 1981

82-1740

~~Independent Committee to Elect~~  
~~WILLIAM E. SIMON~~  
~~President~~

THE SIMON COMMITTEE 9:48

Mrs. Gabriele Pitcairn Pendleton, Chairman

Post Office Box "S"  
Bryn Athyn, Pennsylvania 19009  
(215) 947-2234

May 20, 1981

RECEIVED  
GENERAL COUNSEL  
MAY 21 11:37

Federal Election Commission  
Mr John Warren, Mc Garry, Chairman  
Washington, D.C. 20463

62040314627

Dear Mr Mc Garry,

Thank you for yours of May 8, 1981.  
We have been in touch with your staff  
member Marybeth Tarrant and are now  
preparing our response.

We would certainly hope that the  
Commission would not decide to take action  
against The Simon Committee and that we can  
adhere to your regulations to your satisfaction  
and consequently arrive at a satisfactory  
informal conciliation.

Sincerely,  
G. Morgan Jones, III  
Treasurer.



28 The Simon Committee  
2 P.O. Box 5.  
- Bryn Athyn, Pa, 19009

TO: MR John Warren McGarry Chairman  
Federal Election Commission  
Washington DC 20463

81 MAY 20 P 3: 48

RECEIVED

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

May 8, 1981

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Gabriele Pitcairn Pendleton  
Jenkintown Plaza  
6th Floor  
Jenkintown, Pennsylvania 19046

Re: MUR 1378

Dear Mrs. Pendleton:

On May 6, 1981, the Federal Election Commission determined that there is reason to believe that you violated 2 U.S.C. § 441a(a)(1)(C), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") by contributing in excess of \$5,000 to The Simon Committee in both 1979 and 1980. The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Where appropriate, statements should be submitted under oath.

In the absence of any additional information which demonstrates that no further action should be taken against you, the Commission may find probable cause to believe that a violation has occurred and proceed with formal conciliation. Of course, this does not preclude the settlement of this matter through informal conciliation prior to a finding of probable cause to believe if you so desire.

The investigation now being conducted will be confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

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Letter to Gabrielle Pitcairn Pendleton  
Page 2

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Marybeth Tarrant, the staff member assigned to this matter, at 202/523-4175.

Sincerely,



JOHN WARREN MCGARRY  
Chairman

Enclosures

General Counsel's Factual and Legal Analysis  
Procedures

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4112 1399 Tarrant

1. The following conditions are required: <input type="checkbox"/> There is a clear violation of the Act. <input type="checkbox"/> There is a clear violation of the Act. <input type="checkbox"/> There is a clear violation of the Act. <input type="checkbox"/> There is a clear violation of the Act.	2. COMPLETE FORMASTER FOR PENDING Gabrielle Pitcairn Pendleton Secretary 6th St., Jacksonville, Fla.	3. ATTACHED TO THIS LETTER IS A COPY OF THE FOLLOWING: [Stamp]
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FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE May 8, 1981

MUR NO. 1378  
STAFF MEMBER(S) & TEL. NO.  
Marybeth Tarrant

RESPONDENT Gabriele Pitcairn Pendleton

(202) 523-4175

SOURCE OF MUR: **INTERNALLY GENERATED**

SUMMARY OF ALLEGATIONS

This matter was referred to the Office of General Counsel by the Reports Analysis Division and involves a possible violation of 2 U.S.C. § 441a(a)(1)(C) by Mrs. Pendleton.

FACTUAL BASIS AND LEGAL ANALYSIS

On April 8, 1979, Gabriele Pitcairn Pendleton filed an Independent Expenditure Report (Form 5) reporting \$600 in contributions and \$300 in expenditures on behalf of William E. Simon. On July 6, 1979, Mrs. Pendleton filed another Form 5, this time reporting \$1,200 in contributions to the Independent Campaign to Elect William E. Simon President (the Committee). On that same day, the Committee registered and filed a July 10 Quarterly Report with the Commission. The Committee's chairman was Mrs. Pendleton and the treasurer was C.C. Clinkscales, III. In reply to a letter from the Commission regarding the Committee, RAD received a disavowal letter from Mr. Simon on August 10, 1979.

The Committee's first report disclosed a beginning cash on hand of \$300 and contributions totalling \$1,200 from

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Mrs. Pendleton although her aggregate total read \$1,800. <sup>1/</sup> The next report filed, the October 10, 1979 Quarterly Report, disclosed another \$1,607.50 in contributions from Mrs. Pendleton in addition to a \$3,500 loan from her to the Committee. This loan was not reflected in Mrs. Pendleton's aggregate contribution total as reported by the Committee. The Year End Report revealed another \$2,044 in contributions from Mrs. Pendleton and the \$3,500 loan as still outstanding. Thus, it appeared Mrs. Pendleton's contribution total to the Committee for 1979 was \$8,951.50.

Prior to the Commission's receipt of the Year End Report, Mr. G. Morgan Jones, III, the National Campaign Director, filed a Statement of Organization amendment which changed the name of the Committee slightly and also changed the mailing address from Washington, D.C. to Bryn Athyn, Pa.

On February 15, 1980, a Request for Additional Information (RFAI) was sent to Mr. Clinkscales advising him of a possible violation of 2 U.S.C. § 441a by Mrs. Pendleton. RAD also requested clarification of certain discrepancies in the reports and asked the Committee to disclose the source of its cash on hand.

On March 6, 1980, Mr. Jones called RAD to say that Mr. Clinkscales, who was no longer treasurer, would not release the records of the Committee and, therefore, it was impossible to answer the RFAI. It was suggested to Mr. Jones that he write a letter to the Commission explaining the circumstances and that he should obtain copies of the back reports in order to comply with the RFAI.

On March 10, 1980, a second letter went out to the Committee, this time addressed to Mr. Jones, regarding the Committee's lack of response and informing Mr. Jones of possible legal action. While Mr. Jones did subsequently file a Statement of Organization amendment naming him the treasurer, no response was made to the RFAI.

On April 12, 1980, an April 15, 1980 Quarterly Report was filed by Mr. Jones. This report covered the period from 12/11/79 to 3/31/80 and disclosed more contributions from Mrs. Pendleton, including one for \$1,000 which was made on 12/13/79, thus bringing her total for 1979 to \$9,951.50.

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<sup>1/</sup> It thus appears that the \$600 in contributions reported by Mrs. Pendleton on her filing in April were contributions to the Committee and, therefore, she is the source of the \$300 cash on hand. Apparently, \$300 was spent out of the \$600 originally contributed.

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The report made no mention of the \$3,500 loan from Mrs. Pendleton but rather reported outstanding debts of \$824.34 in addition to \$388.81 as cash on hand at the end of the reporting period.

Shortly after this filing, Mr. Clinkscales filed an April 15, 1980 Quarterly Termination Report which reported a \$1.00 cash on hand and an outstanding debt of \$3,500 owed to Mrs. Pendleton. This was the last report filed by Mr. Clinkscales.

On April 23, 1980, a RAD analyst called Mr. Jones who stated that Mr. Clinkscales would still not hand over the records. Mr. Jones was told that an attempt should be made to refund the excessive amount to Mrs. Pendleton. It was further suggested that an explanatory letter be sent to the Commission. As yet, no response has been received.

Mr. Jones has since filed a Statement of Organization amendment, changing the name of the Committee to "The Simon Committee." He also filed the July 15 and the October 15, 1980 Quarterly Reports. These reports, along with the April 15, 1980 Quarterly Report filed by Mr. Jones, disclose a total of \$9,887.00 in contributions from Mrs. Pendleton for 1980. There is no mention of the \$3,500 loan.

2 U.S.C. § 441a(a)(1)(C) prohibits any person from making contributions to any other political committee (i.e. not an authorized candidate committee or a committee maintained and established by a national political party) in any calendar year which, in the aggregate, exceed \$5,000. Pursuant to section 431(8)(A)(i) (formerly section 431(e)(1)), the term "contribution" includes a loan. Pursuant to 11 C.F.R. § 100.7(a)(1)(i)(B):

A loan is a contribution at the time it is made and is a contribution to the extent that it remains unpaid. The aggregate amount loaned to a ... committee by a contributor when added to other contributions from that individual to that ... committee, shall not exceed the contribution limitations set forth at 11 C.F.R. Part 110.

From the reports filed by the Committee, it appears Mrs. Pendleton exceeded her limit in 1979 by \$4,951.50 and in 1980 by \$4,887.00. Therefore, the General Counsel recommends that the Commission find reason to believe that Mrs. Pendleton violated 2 U.S.C. § 441a.

Recommendation

Find reason to believe that Gabriele Pitcairn Pendleton violated 2 U.S.C. § 441a(a)(1)(C).

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

May 8, 1981

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

G. Morgan Jones, III, Treasurer  
The Simon Committee  
P.O. Box 5  
Bryn Athyn, Pennsylvania 19009

Re: MUR 1378

Dear Mr. Jones:

On May 6, 1981, the Federal Election Commission determined that there is reason to believe that your committee violated 2 U.S.C. §§ 434(a)(4)(A)(i) and 441a(f), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act") and sections 104.11 and 104.12 of the Commission's regulations. The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Where appropriate, statements should be submitted under oath.

In the absence of any additional information which demonstrates that no further action should be taken against your committee, the Commission may find probable cause to believe that a violation has occurred and proceed with formal conciliation. Of course, this does not preclude the settlement of this matter through informal conciliation prior to a finding of probable cause to believe if you so desire.

The investigation now being conducted will be confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

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G. Morgan Jones, III, Treasurer  
Page 2

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Marybeth Tarrant, the staff member assigned to this matter, at 202/523-4175.

Sincerely,

JOHN WARREN MCGARRY  
Chairman

**Enclosures**

General Counsel's Factual and Legal Analysis  
Procedures

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7580

<p>1. The following number is required (check one):  <input type="checkbox"/> 000  <input type="checkbox"/> 001  <input type="checkbox"/> 002  <input type="checkbox"/> 003  <input type="checkbox"/> 004  <input type="checkbox"/> 005  <input type="checkbox"/> 006  <input type="checkbox"/> 007  <input type="checkbox"/> 008  <input type="checkbox"/> 009  <input type="checkbox"/> 010  <input type="checkbox"/> 011  <input type="checkbox"/> 012  <input type="checkbox"/> 013  <input type="checkbox"/> 014  <input type="checkbox"/> 015  <input type="checkbox"/> 016  <input type="checkbox"/> 017  <input type="checkbox"/> 018  <input type="checkbox"/> 019  <input type="checkbox"/> 020  <input type="checkbox"/> 021  <input type="checkbox"/> 022  <input type="checkbox"/> 023  <input type="checkbox"/> 024  <input type="checkbox"/> 025  <input type="checkbox"/> 026  <input type="checkbox"/> 027  <input type="checkbox"/> 028  <input type="checkbox"/> 029  <input type="checkbox"/> 030  <input type="checkbox"/> 031  <input type="checkbox"/> 032  <input type="checkbox"/> 033  <input type="checkbox"/> 034  <input type="checkbox"/> 035  <input type="checkbox"/> 036  <input type="checkbox"/> 037  <input type="checkbox"/> 038  <input type="checkbox"/> 039  <input type="checkbox"/> 040  <input type="checkbox"/> 041  <input type="checkbox"/> 042  <input type="checkbox"/> 043  <input type="checkbox"/> 044  <input type="checkbox"/> 045  <input type="checkbox"/> 046  <input type="checkbox"/> 047  <input type="checkbox"/> 048  <input type="checkbox"/> 049  <input type="checkbox"/> 050  <input type="checkbox"/> 051  <input type="checkbox"/> 052  <input type="checkbox"/> 053  <input type="checkbox"/> 054  <input type="checkbox"/> 055  <input type="checkbox"/> 056  <input type="checkbox"/> 057  <input type="checkbox"/> 058  <input type="checkbox"/> 059  <input type="checkbox"/> 060  <input type="checkbox"/> 061  <input type="checkbox"/> 062  <input type="checkbox"/> 063  <input type="checkbox"/> 064  <input type="checkbox"/> 065  <input type="checkbox"/> 066  <input type="checkbox"/> 067  <input type="checkbox"/> 068  <input type="checkbox"/> 069  <input type="checkbox"/> 070  <input type="checkbox"/> 071  <input type="checkbox"/> 072  <input type="checkbox"/> 073  <input type="checkbox"/> 074  <input type="checkbox"/> 075  <input type="checkbox"/> 076  <input type="checkbox"/> 077  <input type="checkbox"/> 078  <input type="checkbox"/> 079  <input type="checkbox"/> 080  <input type="checkbox"/> 081  <input type="checkbox"/> 082  <input type="checkbox"/> 083  <input type="checkbox"/> 084  <input type="checkbox"/> 085  <input type="checkbox"/> 086  <input type="checkbox"/> 087  <input type="checkbox"/> 088  <input type="checkbox"/> 089  <input type="checkbox"/> 090  <input type="checkbox"/> 091  <input type="checkbox"/> 092  <input type="checkbox"/> 093  <input type="checkbox"/> 094  <input type="checkbox"/> 095  <input type="checkbox"/> 096  <input type="checkbox"/> 097  <input type="checkbox"/> 098  <input type="checkbox"/> 099  <input type="checkbox"/> 100</p>	<p>2. PERSONAL INFORMATION FOR FIES          G. Morgan Jones, III          Treasurer</p>	<p>3. CONTACT INFORMATION          WORKING TEL: 505-555-1234          HOME TEL: 505-555-1234          FAX: 505-555-1234          E-MAIL: gmjones@fies.gov</p>	<p>4. SIGNATURE          G. Morgan Jones, III          DATE: 5-14-81</p>	<p>5. RECEIVED DATE          MAY 14 1981</p>
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MAR 1377

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE May 8, 1981

MUR NO. 1378  
STAFF MEMBER(S) & TEL. NO.

RESPONDENT The Simon Committee

Marybeth Tarrant  
(202) 523-4175

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

This matter was referred to the Office of General Counsel by the Reports Analysis Division and involves possible violations of 2 U.S.C. §§ 434(a)(4)(A)(i), 441(a)2 and 11 C.F.R. §§ 104.11, 104.12 by The Simon Committee.

FACTUAL BASIS AND LEGAL ANALYSIS

On April 8, 1979, Gabriele Pitcairn Pendleton filed an Independent Expenditure Report (Form 5) reporting \$600 in contributions and \$300 in expenditures on behalf of William E. Simon. On July 6, 1979, Mrs. Pendleton filed another Form 5, this time reporting \$1,200 in contributions to the Independent Campaign to Elect William E. Simon President (the Committee). On that same day, the Committee registered and filed a July 10 Quarterly Report with the Commission. The Committee's chairman was Mrs. Pendleton and the treasurer was C.C. Clinkscales, III. In reply to a letter from the Commission regarding the Committee, RAD received a disavowal letter from Mr. Simon on August 10, 1979.

The Committee's first report disclosed a beginning cash on hand of \$300 and contributions totalling \$1,200 from

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Mrs. Pendleton although her aggregate total read \$1,800. <sup>1/</sup> The next report filed, the October 10, 1979 Quarterly Report, disclosed another \$1,607.50 in contributions from Mrs. Pendleton in addition to a \$3,500 loan from her to the Committee. This loan was not reflected in Mrs. Pendleton's aggregate contribution total as reported by the Committee. The Year End Report revealed another \$2,044 in contributions from Mrs. Pendleton and the \$3,500 loan as still outstanding. Thus, it appeared Mrs. Pendleton's contribution total to the Committee for 1979 was \$8,951.50.

Prior to the Commission's receipt of the Year End Report, Mr. G. Morgan Jones, III, the National Campaign Director, filed a Statement of Organization amendment which changed the name of the Committee slightly and also changed the mailing address from Washington, D.C. to Bryn Athyn, Pa.

On February 15, 1980, a Request for Additional Information (RFAI) was sent to Mr. Clinkscales advising him of a possible violation of 2 U.S.C. § 441a by Mrs. Pendleton. RAD also requested clarification of certain discrepancies in the reports and asked the Committee to disclose the source of its cash on hand.

On March 6, 1980, Mr. Jones called RAD to say that Mr. Clinkscales, who was no longer treasurer, would not release the records of the Committee and, therefore, it was impossible to answer the RFAI. It was suggested to Mr. Jones that he write a letter to the Commission explaining the circumstances and that he should obtain copies of the back reports in order to comply with the RFAI.

On March 10, 1980, a second letter went out to the Committee, this time addressed to Mr. Jones, regarding the Committee's lack of response and informing Mr. Jones of possible legal action. While Mr. Jones did subsequently file a Statement of Organization amendment naming him the treasurer, no response was made to the RFAI.

On April 12, 1980, an April 15, 1980 Quarterly Report was filed by Mr. Jones. This report covered the period from 12/11/79 to 3/31/80 and disclosed more contributions from Mrs. Pendleton, including one for \$1,000 which was made on 12/13/79, thus bringing her total for 1979 to \$9,951.50.

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<sup>1/</sup> It thus appears that the \$600 in contributions reported by Mrs. Pendleton on her filing in April were contributions to the Committee and, therefore, she is the source of the \$300 cash on hand. Apparently, \$300 was spent out of the \$600 originally contributed.

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The report made no mention of the \$3,500 loan from Mrs. Pendleton but rather reported outstanding debts of \$824.34 in addition to \$388.81 as cash on hand at the end of the reporting period.

Shortly after this filing, Mr. Clinkscales filed an April 15, 1980 Quarterly Termination Report which reported a \$1.00 cash on hand and an outstanding debt of \$3,500 owed to Mrs. Pendleton. This was the last report filed by Mr. Clinkscales.

On April 23, 1980, a RAD analyst called Mr. Jones who stated that Mr. Clinkscales would still not hand over the records. Mr. Jones was told that an attempt should be made to refund the excessive amount to Mrs. Pendleton. It was further suggested that an explanatory letter be sent to the Commission. As yet, no response has been received.

Mr. Jones has since filed a Statement of Organization amendment, changing the name of the Committee to "The Simon Committee." He also filed the July 15 and the October 15, 1980 Quarterly Reports. These reports, along with the April 15, 1980 Quarterly Report filed by Mr. Jones, disclose a total of \$9,887.00 in contributions from Mrs. Pendleton for 1980. There is no mention of the \$3,500 loan.

2 U.S.C. § 441a(a)(1)(C) prohibits any person from making contributions to any other political committee (i.e. not an authorized candidate committee or a committee maintained and established by a national political party) in any calendar year which, in the aggregate, exceed \$5,000. Section 441a(f) prohibits the acceptance of such excessive contributions. Pursuant to section 431(8)(A)(i) (formerly section 431(e)(1)), the term "contribution" includes a loan. Pursuant to 11 C.F.R. § 100.7(a)(1)(i)(B):

A loan is a contribution at the time it is made and is a contribution to the extent that it remains unpaid. The aggregate amount loaned to a ... committee by a contributor when added to other contributions from that individual to that ... committee, shall not exceed the contribution limitations set forth at 11 C.F.R. Part 110.

From the reports filed by the Committee, it appears Mrs. Pendleton exceeded her limit in 1979 by \$4,951.50 and in 1980 by \$4,887.00. Thus, the General Counsel recommends that the Commission find reason to believe the Committee violated 2 U.S.C. § 441a(f) by accepting excessive contributions.

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2 U.S.C. § 434(a)(4)(A)(i) requires all political committees other than authorized committees of a candidate to file quarterly reports in an election year. As the Committee has not filed a Year End Report for 1980 and has not terminated its reporting obligations, the General Counsel recommends that the Commission find reason to believe the Committee violated 2 U.S.C. § 434(a)(4)(A)(i).

11 C.F.R. § 104.11 requires all outstanding debts and obligations owed by a political committee to be continuously reported until extinguished. As there is no evidence that the \$3,500 loan to Mrs. Pendleton has been repaid, the General Counsel recommends that the Commission find reason to believe the Committee violated 11 C.F.R. § 104.11 for failing to continuously report this debt.

11 C.F.R. § 104.12 (formerly section 104.10) requires all political committees which have cash on hand at the time of registration to disclose the source of such funds. As the Committee never reported the source of its beginning balance of \$300, it has not complied with this requirement. Accordingly, the General Counsel recommends that the Commission find reason to believe the Committee violated 11 C.F.R. § 104.12.

#### Recommendations

1. Find reason to believe that The Simon Committee violated 2 U.S.C. § 441a(f).
2. Find reason to believe that The Simon Committee violated 2 U.S.C. § 434(a)(4)(A).
3. Find reason to believe that The Simon Committee violated 11 C.F.R. § 104.11.
4. Find reason to believe that The Simon Committee violated 11 C.F.R. § 104.12.

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REPORT OF THE FEDERAL ELECTION COMMISSION

In the Matter of )  
The Simon Committee )  
Gabriele Pitcairn Pendleton )

MUR 1378

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on May 6, 1981, the Commission decided by a vote of 4-0 to take the following actions regarding MUR 1378:

1. Find REASON TO BELIEVE that Gabriele Pitcairn Pendleton violated 2 U.S.C. § 441a(a)(1)(C).
2. Find REASON TO BELIEVE that The Simon Committee violated 2 U.S.C. § 441a(f).
3. Find REASON TO BELIEVE that The Simon Committee violated 2 U.S.C. § 434(a)(4)(A)(i).
4. Find REASON TO BELIEVE that The Simon Committee violated 11 C.F.R. § 104.11.
5. Find REASON TO BELIEVE that The Simon Committee violated 11 C.F.R. § 104.12.

(Continued)

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First General Council's Report  
Dated May 4, 1981  
MUR 1878

5. Approve the letters as attached to the  
First General Council's Report dated  
May 4, 1981.

Commissioners Harris, Reiche, Thomson and Tiersman voted  
affirmatively in this matter; Commissioners Albana and McGarry  
did not cast a vote in this matter.

Attest:



*Marjorie W. Emmons*  
Marjorie W. Emmons  
Secretary of the Commission

62040344641

Received in Office of the Commission Secretary: 5-4-81, 12:39  
Circulated on 48 hour vote basis: 5-4-81, 4:00

1000

THE UNIVERSITY OF CHICAGO  
PRESS



RECEIVED  
OFFICE OF THE  
COMMISSION SECRETARY

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL  
BY GGC TO THE COMMISSION 5-4-81

MUR # 1234  
STAFF Marybeth Tarrant

SOURCE OF MUR: INTERNALLY GENERATED

RESPONDENT'S NAME: The Simon Committee  
Gabriele Pitcairn Pendleton

RELEVANT STATUTE: 2 U.S.C. §§ 431(8)(A)(i), 434(a)(4)(A)(i),  
441a(a)(1)(C), 441a(f)  
11 C.F.R. §§ 104.11, 104.12

INTERNAL REPORTS CHECKED: The Simon Committee

FEDERAL AGENCIES CHECKED: None

GENERATION OF MATTER

This matter was referred to the Office of General Counsel by the Reports Analysis Division (RAD) for possible violations of 2 U.S.C. § 441a. See Attachment 1.

FACTUAL BASIS AND LEGAL ANALYSIS

On April 8, 1979, Gabriele Pitcairn Pendleton filed an Independent Expenditure Report (Form 5) reporting \$600 in contributions and \$300 in expenditures on behalf of William E. Simon. On July 6, 1979, Mrs. Pendleton filed another Form 5, this time reporting \$1,200 in contributions to the Independent Campaign to Elect William E. Simon President (the Committee). On that same day, the Committee registered and filed a July 10 Quarterly Report with the Commission. The Committee's chairman was Mrs. Pendleton and the treasurer was C.C. Clinkscales, III. In reply to a letter from the Commission regarding the Committee, RAD received a disavowal letter from Mr. Simon on August 10, 1979.

The Committee's first report disclosed a beginning cash on hand of \$300 and contributions totalling \$1,200 from

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Mrs. Pendleton although her aggregate total read \$1,800. 1/ The next report filed, the October 10, 1979 Quarterly Report, disclosed another \$1,607.50 in contributions from Mrs. Pendleton in addition to a \$3,500 loan from her to the Committee. This loan was not reflected in Mrs. Pendleton's aggregate contribution total as reported by the Committee. The Year End Report revealed another \$2,044 in contributions from Mrs. Pendleton and the \$3,500 loan as still outstanding. Thus, it appeared Mrs. Pendleton's contribution total to the Committee for 1979 was \$8,951.50.

Prior to the Commission's receipt of the Year End Report, Mr. G. Mergan Jones, III, the National Campaign Director, filed a Statement of Organization amendment which changed the name of the Committee slightly and also changed the mailing address from Washington, D.C. to Bryn Athyn, Pa.

On February 15, 1980, a Request for Additional Information (RFAI) was sent to Mr. Clinkscales advising him of a possible violation of 2 U.S.C. § 441a by Mrs. Pendleton. RAD also requested clarification of certain discrepancies in the reports and asked the Committee to disclose the source of its cash on hand.

On March 6, 1980, Mr. Jones called RAD to say that Mr. Clinkscales, who was no longer treasurer, would not release the records of the Committee and, therefore, it was impossible to answer the RFAI. It was suggested to Mr. Jones that he write a letter to the Commission explaining the circumstances and that he should obtain copies of the back reports in order to comply with the RFAI.

On March 10, 1980, a second letter went out to the Committee, this time addressed to Mr. Jones, regarding the Committee's lack of response and informing Mr. Jones of possible legal action. While Mr. Jones did subsequently file a Statement of Organization amendment naming him the treasurer, no response was made to the RFAI.

On April 12, 1980, an April 15, 1980 Quarterly Report was filed by Mr. Jones. This report covered the period from 12/11/79 to 3/31/80 and disclosed more contributions from Mrs. Pendleton, including one for \$1,000 which was made on 12/13/79, thus bringing her total for 1979 to \$9,951.50.

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1/ It thus appears that the \$600 in contributions reported by Mrs. Pendleton on her filing in April were contributions to the Committee and, therefore, she is the source of the \$300 cash on hand. Apparently, \$300 was spent out of the \$600 originally contributed.

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The report made no mention of the \$3,500 loan from Mrs. Pendleton but rather reported outstanding debts of \$824.34 in addition to \$388.81 as cash on hand at the end of the reporting period.

Shortly after this filing, Mr. Clinkscales filed an April 15, 1980 Quarterly Termination Report which reported a \$1.00 cash on hand and an outstanding debt of \$3,500 owed to Mrs. Pendleton. This was the last report filed by Mr. Clinkscales.

On April 23, 1980, a RAD analyst called Mr. Jones who stated that Mr. Clinkscales would still not hand over the records. Mr. Jones was told that an attempt should be made to refund the excessive amount to Mrs. Pendleton. It was further suggested that an explanatory letter be sent to the Commission. As yet, no response has been received.

Mr. Jones has since filed a Statement of Organization amendment, changing the name of the Committee to "The Simon Committee." He also filed the July 15 and the October 15, 1980 Quarterly Reports. These reports, along with the April 15, 1980 Quarterly Report filed by Mr. Jones, disclose a total of \$9,887.00 in contributions from Mrs. Pendleton for 1980. There is no mention of the \$3,500 loan.

2 U.S.C. § 441a(a)(1)(C) prohibits any person from making contributions to any other political committee (i.e. not an authorized candidate committee or a committee maintained and established by a national political party) in any calendar year which, in the aggregate, exceed \$5,000. Section 441a(f) prohibits the acceptance of such excessive contributions. Pursuant to section 431(8)(A)(i) (formerly section 431(e)(1)), the term "contribution" includes a loan. Pursuant to 11 C.F.R. § 100.7(a)(1)(i)(B):

A loan is a contribution at the time it is made and is a contribution to the extent that it remains unpaid. The aggregate amount loaned to a ... committee by a contributor when added to other contributions from that individual to that ... committee, shall not exceed the contribution limitations set forth at 11 C.F.R. Part 110.

From the reports filed by the Committee, it appears Mrs. Pendleton exceeded her limit in 1979 by \$4,951.50 and in 1980 by \$4,887.00. Thus, the General Counsel recommends that the Commission find reason to believe both respondents violated 2 U.S.C. § 441a.

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2 U.S.C. § 434(a)(4)(A)(i) requires all political committees other than authorized committees of a candidate to file quarterly reports in an election year. As the Committee has not filed a Year End Report for 1980 and has not terminated its reporting obligations, the General Counsel recommends that the Commission find reason to believe the Committee violated 2 U.S.C. § 434(a)(4)(A)(i).

11 C.F.R. § 104.11 requires all outstanding debts and obligations owed by a political committee to be continuously reported until extinguished. As there is no evidence that the \$3,500 loan to Mrs. Pendleton has been repaid, the General Counsel recommends that the Commission find reason to believe the Committee violated 11 C.F.R. § 104.11 for failing to continuously report this debt.

11 C.F.R. § 104.12 (formerly section 104.10) requires all political committees which have cash on hand at the time of registration to disclose the source of such funds. As the Committee never reported the source of its beginning balance of \$300, it has not complied with this requirement. Accordingly, the General Counsel recommends that the Commission find reason to believe the Committee violated 11 C.F.R. § 104.12.

Recommendations

1. Find reason to believe that Gabriele Pitcairn Pendleton violated 2 U.S.C. § 441a(a)(1)(C).
2. Find reason to believe that The Simon Committee violated 2 U.S.C. § 441a(f).
3. Find reason to believe that The Simon Committee violated 2 U.S.C. § 434(a)(4)(A)(i).
4. Find reason to believe that The Simon Committee violated 11 C.F.R. § 104.11.
5. Find reason to believe that The Simon Committee violated 11 C.F.R. § 104.12.
6. Approve the attached letters.

Attachments

1. Referral from Rad
2. Proposed letters

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ATTACHMENT #1

REFER TO INSTRUCTIONS ON REVERSE SIDE BEFORE COMPLETING  
RAD 741-104

REPORTS ANALYSIS REFERRAL SHEET - UPDATE

DATE NOVEMBER 29, 1980 ANALYST Mike Thompson  
TO: Office of General Counsel TEAM CHIEF Irene Allen  
THROUGH: STAFF DIRECTOR PA COMPLIANCE REVIEW 66/B  
FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS AL.

Attachment 1

CANDIDATE/COMMITTEE: The Simon Committee (Independent Oate to Elect William Simon Pres.)  
TREASURER: Mr. G. Morgan Jones, III, (Current); C.C. Clinkscales, III, (Former)  
ADDRESS: P.O. Box "S"  
Bryn Athyn, PA 19009

AFFILIATE(S):

ALLEGATION(S): ACCEPTANCE OF EXCESSIVE CONTRIBUTIONS CITE: 2 U.S.C. 441a(a)(1) ATTACHMENT(S)

DATE INITIATED:

MANNER IN WHICH REVIEW WAS INITIATED:

- Normal Review       Other:  
 Special Project:

ATTACHMENT



REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment 1.

PERIOD COVERED FROM 3/23/80 TO 9/30/80

TOTAL RECEIPTS \$ 36,379\* TOTAL EXPENDITURES \$ 36,722\*

CASH ON HAND \$ 344\* DEBTS \$ 0 1/2

**HISTORY:**

**RESULTS OF REVIEW:**

**ATTACHMENT**

Request for Additional Information (& SV) dated 2/15/80 sent to former treas. 2

Second Notice dated 3/10/80 sent to current treasurer 4

**COMMUNICATIONS WITH CANDIDATE/COMMITTEE:**

**ATTACHMENT**

Telecon with Mr. Jones, (current treasurer) on 3/06/80 3

Telecon with Mr. Jones 4/23/80 5

**REASON(S) FOR REFERRAL:**

**ATTACHMENT**

Failure to respond to RFAI(SV); failure to refund excessive contributions.

Ms. Gabriele Pitcairn Pendleton has contributed, to date, in excess of \$19,000 to the committee (\$19,838.50).

**OTHER PENDING ACTIONS INITIATED BY RAD:**

**ATTACHMENT**

NONE

**OTHER RELEVANT INFORMATION:**

**ATTACHMENT**

\*Please see Attachment 6: Various discrepancies in reports 6

Please see Attachment 7: Copies of all reports and statements filed 7

PREVIOUS OGC/AUDIT REFERRALS FROM RAD: NONE

1/ Please see Attachment 6 for explanation of Discrepancies, Page 2 6

INDEPENDENT EXPENDITORS

COMMITTEE	DOCUMENT	RECEIPTS		EXPENDITURES		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
		PRIMARY	GENERAL	PRIMARY	GENERAL			
<b>SINON COMMITTEE</b>								
1979	STATEMENT OF ORGANIZATION					6 JUL 79		
	MISCELLANEOUS REPORT					16 JUL 79 FROM FEC		
	MISCELLANEOUS REPORT					10 AUG 79 TO FEC		
	JULY QUARTERLY	4,191		3,474		1 APR 79 - 30 JUN 79		
	REQUEST FOR ADDITIONAL INFORMATION					1 APR 79 - 30 JUN 79		
	REQUEST FOR ADDITIONAL INFORMATION 2ND					1 APR 79 - 30 JUN 79		
	OCTOBER QUARTERLY	13,704		13,138		1 JUL 79 - 30 SEP 79		
	OCTOBER QUARTERLY - AMENDMENT	13,701		13,221		1 JUL 79 - 30 SEP 79		
	REQUEST FOR ADDITIONAL INFORMATION					1 JUL 79 - 30 SEP 79		
	REQUEST FOR ADDITIONAL INFORMATION 2ND					1 JUL 79 - 30 SEP 79		
	YEAR-END	9,047		10,415		1 OCT 79 - 31 DEC 79		
	REQUEST FOR ADDITIONAL INFORMATION					1 OCT 79 - 31 DEC 79		
	REQUEST FOR ADDITIONAL INFORMATION 2ND					1 OCT 79 - 31 DEC 79		
1980	STATEMENT OF ORGANIZATION - AMENDMENT					21 JAN 80		
	STATEMENT OF ORGANIZATION - AMENDMENT					30 APR 80		
	STATEMENT OF ORGANIZATION - AMENDMENT					11 JUL 80		
	APRIL QUARTERLY		5,143		4,754	1 DEC 79 - 31 MAR 80		
	APRIL QUARTERLY - TERMINATED		123		132	1 JAN 80 - 31 MAR 80		
	JULY QUARTERLY		2,100		2,447	1 APR 80 - 30 JUN 80		
	OCTOBER QUARTERLY		7,137		6,811	1 JUL 80 - 30 SEP 80		
	<b>TOTAL</b>	<b>27,019</b>	<b>9,340</b>	<b>27,310</b>	<b>9,412</b>			<b>TOTAL PAGES</b>

30,379

36,722

MICROFILM



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

ATTACHMENT 2

15 February 1980

Mr. C. C. Clinksdales, III, Treasurer  
Independent Committee to Elect William E. Simon President (C99001174)  
P.O. Box "5"  
Bryn Athyn, Pennsylvania 19009

Dear Mr. Clinksdales:

This letter is prompted by the Commission's preliminary review of your July 10, October 10, October 10 Amendment and Year-End, 1979 Reports of Receipts and Expenditures. The review raised questions as to specific contributions and/or expenditures and to the reporting of certain information required by the Federal Election Campaign Act, (the Act). An itemization of these areas follows:

On Schedule A for Lines 14a and 17a, your reports disclose contributions which appear to exceed the limits of 2 U.S.C. 441a. Pertinent portions of your reports are attached so that a review of your records may be made. (Please note also that under 11 C.F.R. 100.4(a)(1)(1), a loan is a contribution to the extent that the obligation remains outstanding). The Act precludes an individual from making contributions to an "other political committee" which, in the aggregate, exceed \$5,000. If you have received contributions which exceed the limits, the Commission recommends that you refund to the donor the amount which is in excess of \$5,000. Refunds should be reported to the Commission immediately by letter and on Schedule B for Line 21a on your next report.

If you find that the contributions in question have been disclosed incompletely or incorrectly, you should amend your original reports with information which would clarify the public record.

Although the Commission may take further legal steps regarding the acceptance of excessive contributions, your prompt refund of the excessive amount to the donor will be taken into consideration by the Commission.

11 C.F.R. 104.10 requires committees that have cash on hand at the time of registration to disclose the source(s) of those funds. Please amend your July 10 Report to provide the source(s) of the \$300 reported on this initial report as beginning cash on hand.

On Schedule C for Line 13 for the October 10 Report, the committee disclosed a loan for \$3,500 from Mrs. Gabriele Pitcairne Pendleton; however, this loan has not been itemized on Schedule A for Line 17a. Please amend your October 10 Report to provide a Schedule A for this loan received.

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314651



Page Two.

Request for Additional Information.

July 10, October 10, October 10 Amendment and Year-End, 1979 Reports.  
Independent Committee to Elect William E. Simon President (C99001174)

On Schedule A for Line 14a for the July 10 Report, (initial report), the committee itemized contributions from Mrs. Gabriele Pitcairne Pendleton totalling \$1,200; however, the aggregate disclosed for this contributor is \$1,800. Please provide the circumstances for this discrepancy and amend your July 10 Report accordingly.

11 C.F.R. 100.4(a)(1)(1) states that a loan is a contribution to the extent that the obligation remains outstanding. Please amend your October 10 and Year-End Reports to include the loan of \$3,500 from Mrs. Gabriele Pitcairne Pendleton in the totals for Aggregate Year-to-Date contributed.

On Schedule E for Line 23 for the July 10 Report, the committee itemized \$1,895.58 as "Independent Expenditures"; however, the total disclosed is \$1,886.58. Please amend your report accordingly.

The committee's October 10 Amendment contained adjustments to itemized expenditures in the amount of \$30 increase and unitemized expenditures in the amount of \$113 increase. Please amend your October 10 Report to provide the circumstances for these adjustments and provide amended Schedule(s) B as appropriate.

On Schedule A for Line 14a for the Year-End Report, the committee itemized \$5,224 in contributions. However, the total disclosed by the committee is \$5,214. On Schedule B for Line 20a for the Year-End Report, the committee itemized \$9,703.18 in expenditures. However, the total disclosed by the committee is \$9,803.18. Please provide the circumstances for these discrepancies and amend your Year-End Report accordingly.

2 U.S.C. 434(b)(9) requires disclosure of the identification of each person to whom an expenditure has been made by or on behalf of the committee which is in excess of \$100, or in an amount less than \$100 if the total exceeds \$100 for the calendar year, together with the amount, date and particulars of each such expenditure. Please provide the person to whom expenditures have been made along with the amount, date and purpose(s) of each such expenditure, if itemizable, for the following reimbursements, (if expenditures made by such persons were not itemizable, please so state):

Richard M. McNeil	\$147.64	"Itemized Expenses"	October 10 Report
W. McMichael Jones	\$176.02	"Itemized Expenses"	Year-End Report

In addition, advances paid to persons are not considered to be expenditures, but rather a part of the committee's cash on hand, until an expenditure "on behalf of the committee" is made. Such expenditures, when made from the advances funds, should be reported on Schedule B in accordance with 2 U.S.C. 434(b)(9). (Please be advised that under 2 U.S.C. 437b(a)(2), no expenditure may be made except by check drawn on one or more of the committee's designated campaign depositories. Further, 2 U.S.C. 432(b) requires that all funds of a political committee shall be segregated from, and not comingled with, any personal funds). Please amend your October 10 and Year-End Reports to provide the proper information for the following advances:

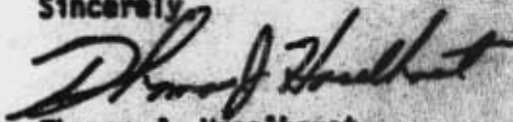
0 2004031060010  
44652

Send To:  
Request for Additional Information.  
July 10, October 10, October 10 Amendment and Year-End, 1979 Reports.  
Independent Committee to Elect William E. Simon President (290001174)

C.C. Clinksdales, III	\$200	"Advance"	October 10 Report
M. McMichael Jones	\$500	"Advance"	Year-End Report

Amendments to your original reports correcting the above matters should be filed at the Commission within fifteen (15) days of the date of this notice. If you need assistance, contact Mike Thompson on the toll-free number, (800) 424-9530. The local number is (202) 523-4048.

Sincerely,



Thomas J. Haselhorst  
Assistant Staff Director  
Reports Analysis Division

8204031050041  
820403446531

Name of Candidate or Committee in Full  
**Independent Campaign To Elect William E. Simon President**

Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Gabrielle Patricia Pendleton Box 228, Cairnwood Bryn Athyn, PA 19004	Housewife	10/9/79 10/10/79 10/20/79 11/10/79 11/20/79	\$125.00 (Party In-Kind) 19.00 (Party In-Kind) 200.00 100.00 100.00 200.00
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed	Aggregate Year-To-Date ... \$5,441.50	11/29/79
Full Name, Mailing Address and ZIP Code Walter R O'Connell 460 Park Avenue New York City, NY 10022	Olin Corp. 460 Park Ave, NYC, NY 10022	12/22/79	\$1,000.00
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed	Aggregate Year-To-Date ... \$1,000.00	
Full Name, Mailing Address and ZIP Code Dr. William Seidman 810 Park Avenue New York City, NY 10022	Phelps Dodge Corp.	11/19/79	\$1,000.00
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed	Aggregate Year-To-Date ... \$1,100.00	
Full Name, Mailing Address and ZIP Code E. S. Williams 68 Hawthorne Rd. Pittsburgh, PA 15238	PPG Industries	11/14/79	\$300.00
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed	Aggregate Year-To-Date ... \$300.00	
Full Name, Mailing Address and ZIP Code Ed Tecker Barks, NE 69041	Same	4/2/79	\$25.00
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed	Aggregate Year-To-Date ... \$125.00	
Full Name, Mailing Address and ZIP Code Samuel Tamposi 2 Amburn St. Nashua, NH 03060	Self employed	10/13/79	\$150.00
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed	Aggregate Year-To-Date ... \$150.00	
Full Name, Mailing Address and ZIP Code Lawrence W. Rothman 274 1/2 N. Main St. Concord, NH 03301	Retired	10/15/79 11/8/79	\$200.00 \$100.00
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed	Aggregate Year-To-Date ... \$300.00	
SUBTOTAL of receipts this page (optional) .....			\$4,809.00
TOTAL this period (last page this line number only) .....			\$



Name of Candidate or Committee in Full

Independent Campaign to Elect William E. Simon President

Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Gabriele Pitcairn Fendleton Cairnwood, Box 338 Bryn Athyn, PA 19009	home	7/30/79	\$300.00 ✓
	Occupation housewife	8/30/79	300.00 ✓
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		9/27/79	707.50 ✓ kind
Aggregate Year-To-Date ... \$ 3407.50		9/29/79	300.00 ✓
Mrs. Habel K. Johnson 3400 Morgan Road Ann Arbor, MI 48104	same	8/14/79	\$500.00 ✓
	Occupation housewife		
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Aggregate Year-To-Date ... \$ 500.00			
Mr. James A. Morrison 3920 B 70th Avenue Crt. West Tacoma, WA 98466	United Airlines SEA-TAC Airport, Seattle	8/6/79	\$100.00
	Occupation Airline pilot	8/24/79	50.00
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Aggregate Year-To-Date ... \$ 150.00			
Garth Pitcairn 600 Woodward Drive Huntingdon Valley, PA 19006	Pitcairn Volkswagen, Inc. Route 1 Morrisville, Pa 19067	8/13/79	\$1,000.00 ✓
	Occupation Automobile Dealer		
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Aggregate Year-To-Date ... \$1,000.00			
Joseph A. Gallagher 1700 Market Street Philadelphia, PA 19103	Industrial Valley Bank Philadelphia, PA	8/27/79	\$200.00 ✓
	Occupation President		
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Aggregate Year-To-Date ... \$200.00			
Mrs. Hebe Dick Baldwin 225 South 8th Street Philadelphia, PA 19106	home	8/27/79	\$25.00
	Occupation housewife	9/7/79	975.00 ✓
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Aggregate Year-To-Date ... \$1,000			
Mr. Dan Pitner P. O. Box 113 Tupelo, MS 38801	home	8/30/79	\$250.00 ✓
	Occupation		
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Aggregate Year-To-Date ... \$ 250.00			
SUBTOTAL of receipts this page (optional) .....			\$ 4,707.50
TOTAL this period (last page this line number only) .....			\$

Name of Candidate and Committee in Full

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payments To Date	Outstanding Balance at Close of This Period
Mrs. Gabrielle Pittsirn Pendleton Box 388, Cairnwood H.C. Bays, Allga, PA 17009	8/28/79	\$3,500.00	\$ .00	\$3,500.00
<input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other				

NATURE OF OBLIGATION (Details of Debt):  
financial transfer to pay for magazine ads. To be re-paid by campaign

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payments To Date	Outstanding Balance at Close of This Period
		\$	\$	\$
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other				

NATURE OF OBLIGATION (Details of Debt):

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payments To Date	Outstanding Balance at Close of This Period
		\$	\$	\$
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other				

NATURE OF OBLIGATION (Details of Debt):

SUBTOTALS this period this page (optional) . . . . .	\$	\$	\$
TOTAL this period (last page this line number only) . . . . .	\$	\$	\$3,500.00
Carry outstanding balance only to appropriate line of summary.			

620031060044  
62040344656

(Contributions, Transfers, Contributions to-Child,  
 for Income, Loans, Refunds)

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

Use Business Schedules for  
 each numbered total

Name of Candidate or Committee in Full

**Independent Campaign to Elect William E. Simon President**

Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Gabriele Pittsaira Pendleton Cairwood, Box 338 Bryn Athyn, PA 19009	home	4/16/79	\$300.00 <i>7.5</i>
	Occupation housewife	4/28/79	\$300.00 <i>0.5</i>
	<input type="checkbox"/> Check if Contributor is self-employed	5/29/79	\$300.00 <i>1.5</i>
	Aggregate Year-To-Date ... \$ 1,800.00	6/28/79	\$300.00 <i>1.5</i>
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Willard D. Pendleton 3032 Huntingdon Pike Bryn Athyn, PA 19009	home	6/14/79	\$1,000.00
	Occupation retired bishop		
	<input type="checkbox"/> Check if Contributor is self-employed		
	Aggregate Year-To-Date ... \$ 1,000.00		
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Lloyd Johnson 3400 Morgan Road Ann Arbor, MI 48104	Whitehall Convalescent Homes	4/28/79	\$1,000.00
	3400 Morgan Road Ann Arbor, MI 48104		
	President of corporation		
	Aggregate Year-To-Date ... \$ 1,000.00		
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Michael & Joan Votto 664 Second Street Pike Southampton, PA 18996	Self-employed	5/25/79	\$400.00 <i>1.5</i>
	Occupation Self-employed		
	<input checked="" type="checkbox"/> Check if Contributor is self-employed		
	Aggregate Year-To-Date ... \$ 400.00		
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
(Faint name and address)	(Faint business name)	(Faint date)	(Faint amount)
	(Faint occupation)		
	<input type="checkbox"/> Check if Contributor is self-employed		
	Aggregate Year-To-Date ... \$ (Faint amount)		
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
(Faint name and address)	(Faint business name)	(Faint date)	(Faint amount)
	(Faint occupation)		
	<input type="checkbox"/> Check if Contributor is self-employed		
	Aggregate Year-To-Date ... \$ (Faint amount)		
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			

SUBTOTAL of receipts this page (optional) ..... \$ 3,600.00  
 TOTAL this period (last page this line number only) ..... \$ 4,181.00



TELECON

ANALYST Mike Thompson  
initiated call?                     

TELECON WITH: Mr. Morgan Jones, National Campaign Director  
initiated call? yes

Candidate/Committee: Independent Committee to elect William Simon President

DATE: March 6, 1980

SUBJECT(s): SV for excessive contributions and RFAI for disclosure provisions

Mr. Jones called to say that Mr. Clinksdales, the former treasurer, has refused to release the records of the committee for the period during which he was the treasurer. Mr. Jones came to the committee around December, 1979 or January 1980 and was not familiar with the operation of the committee but agreed to take over. The committee has since appointed a new treasurer, (for which I requested an amendment to the committee's Statement of Organization).

I told him that a response was due on the RFAI and SV and that the only thing that I could do was make note of the problems in the committee's file. I suggested that he research what was available and make any necessary refunds as soon as possible.

I suggested that Mr. Jones send a letter to the Commission explaining the circumstances and detailing his efforts in the matter. This would serve to indicate, publicly, that he was not ignoring the issues. He said that he would send a letter today.

He asked for a copy of the Year-End Report. I gave him the phone number for Public Disclosure Division and explained how to get copies of documents.

62040314658

(215) NO LISTING IN  
BRYAN RAY  
for G. Morgan Jones.  
(215) 947-2234



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

ATTACHMENT 4

10 March 1980

Mr. G. Morgan Jones, III, National Campaign Director  
Independent Committee to Elect William E. Simon President (C99001174)  
P.O. Box "5"  
Bryn Athyn, Pennsylvania 19009

Reference: July 10 Report, 1979 (4/1/79 - 6/30/79)  
October 10 Report, 1979 (7/1/79 - 9/30/79)  
October 10 Amended Report, 1979 (7/1/79 - 9/30/79)  
Year-End Report, 1979 (10/1/79 - 12/31/79)

Dear Mr. Jones:

This letter is to inform you that as of this date, the Commission has not received your response to our request for additional information, dated 15 February 1980. That notice requested information essential to full public disclosure of your Federal election financial activity and to assure compliance with the provisions of the Federal Election Campaign Act, (the Act).

If no response is received within fifteen (15) days of the date of this notice, the Commission may choose to take legal action to insure compliance with the Act.

If you have any questions, contact Mike Thompson on the toll-free number, (800) 424-9530. The local number is (202) 523-4048.

Sincerely,

*Thomas J. Haselhorst*  
for Thomas J. Haselhorst  
Assistant Staff Director  
Reports Analysis Division

Attachment: Request for Additional Information  
dated 15 February 1980

6204031060018  
344659





OTHER RELEVANT INFORMATION:

1. The RFAI and circumstances after the 1979 Year-End Report:

The RFAI, covering through the committee's 1979 Year-End Report, addressed contributions totalling \$8,351.50 from Mrs. Gabrielle Pitcairn Pendleton, the committee's Chairman. It was mailed to Mr. C.C. Clinkscales, III, the treasurer of the committee for that period. However, Mr. G. Morgan Jones, III was by that time the treasurer of the committee having assumed the duties in late December or early January. The problems were explained to Mr. Jones and he agreed to make an attempt to correct those problems.

Since the 1979 Year-End Report, Mrs. Pendleton has contributed an additional \$10,887.00 to the committee. The total disclosed, (itemized), by the committee is now at \$19,238.50\* or \$14,238.50 in excess of the limits of 2 U.S.C. 441a(a)(1).

The current treasurer, Mr. Jones, has attempted to obtain the committee's records from the former treasurer, Mr. Clinkscales, who has apparently refused to release them.

Copies of reports were sent to Mr. Jones upon his request and it was suggested to Mr. Jones that he notify the Commission in writing of his problems and his efforts to resolve the matter. Mr. Jones was informed of the limitations on contributions and was informed of the serious nature of such possible violations. (See telecons, Attachments 3 & 5.) No such document has been received from Mr. Jones. In fact, no response to this RFAI or the telecons has been received.

Please see Attachment 7 for copies of all reports and statements filed by the committee and by Mrs. Pendleton.

\*These amounts are as itemized by the committee. Mrs. Pendleton filed two reports of Independent Expenditures, however, which seem to be actually activity of the "committee." (See Attachments 7(G) & 7(H).) The first report from Mrs. Pendleton is noted as an April 10 Quarterly Report and covers the period from "inception" through March 31, 1979. She "contributed" a total of \$600 and expended \$300 leaving a "balance" of \$300.

The first report filed by the committee, the July 10 Quarterly Report, discloses \$300 initial cash on hand and an aggregate of \$600 greater than itemized for Mrs. Pendleton, (\$1,200 itemized contributions and \$1,800 aggregate year-to-date). These circumstances suggest that the \$600 Mrs. Pendleton "contributed" to herself was actually contributed to the committee during the April 10 reporting period. Mrs. Pendleton's July 10 Report of Independent Expenditures and Contributions simply discloses a total of \$1,200 in "Independent Contributions" which matches that itemized by the committee from her for this period.

Her total contributions then, including the \$600 during the April 10 reporting period, is \$19,838.50 or \$14,838.50 excessive.

02040344661

ATTACHMENT 6, (Continued):

2. Discrepancies in Reports:

Although many minor discrepancies were noted through 1979 Year-End Report, the most obvious problem occurred when two distinct April 15, 1980 Reports were filed by the committee.

The former treasurer, Mr. Clinkscales, filed an April 15 Termination Report which disclosed \$1.00 as closing cash on hand but \$3,500 debts owed by the committee. (The debt was a loan outstanding from Mrs. Pendleton.) The current treasurer, Mr. Jones, also filed an April 15 Report but this report overlapped coverage dates back into 1979 and disclosed \$824 in debts owed by the committee - this report excluded the \$3,500 owed to Mrs. Pendleton. In addition, this report disclosed an additional contribution from Mrs. Pendleton which had not been previously reported on the committee's, (Mr. Clinkscale's), 1979 Year-End Report.

The discrepancy in receipts, expenditures and cash on hand appears to be caused by these two widely differing reports.

NOTE:

The committee registered as a Single Candidate Unauthorized Committee supporting the candidacy of William Simon for President. Mr. Simon promptly disavowed the committee and never became a candidate. Therefore, RAD has proceeded on the premise that the contribution limitation from an individual is \$5,000. 2 U.S.C. 441a(a)(1)(C).

62040344662

OTHER RELEVANT INFORMATION

INDEX TO REPORTS AND STATEMENTS FILED:

STATEMENTS:

Statement of Organization (7/06/79) . . . . .	A
Disavowal Letter from Commission to Mr. Simon (7/16/79) . . . . .	B
Letter from Mr. Simon Disavowing Committee (8/10/79) . . . . .	C <i>Attached</i>
Statement of Organization Amendment (1/21/80) . . . . .	D
Statement of Organization Amendment (4/10/80) . . . . .	E
Statement of Organization Amendment (7/16/80) . . . . .	F

REPORTS:

Report of Independent Expenditures filed by Mrs. Pendleton (4/09/79)	G <i>Attached</i>
Report of Independent Expenditures filed by Mrs. Pendleton (7/06/79)	H <i>Attached</i>
July 10 Report from Committee - Initial Report (7/06/79) . . . . .	I
October 10 Report from Committee (10/11/79) . . . . .	J
October 10 Amendment from Committee (2/04/80) . . . . .	K
Year-End Report from Committee (2/04/80) . . . . .	L
April 15 Termination Report from former treasurer (4/18/80) . . . . .	M <i>Attached</i>
April 15 Report from new treasurer (4/12/80) . . . . .	N <i>Attached</i>
July 15 Report from committee (7/16/80) . . . . .	O <i>Attached</i>
October 15 Report from committee (10/14/80) . . . . .	P <i>Attached</i>

6 2 0 4 0 3 4 4 6 6 3



WILLIAM E. SIMON  
33<sup>rd</sup> Floor  
1821 AVENUE OF THE AMERICAS  
New York, New York 10020

FEDERAL ELECTION COMMISSION

79 JUL 10 PM 12:18

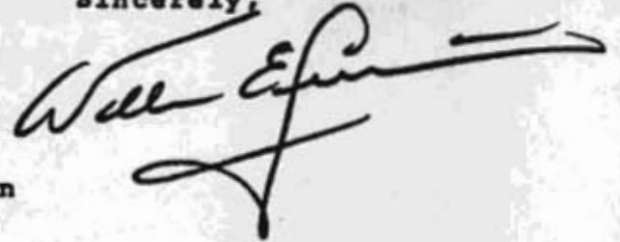
July 30, 1979

Gentlemen:

On July 20, 1979 I received a letter dated July 16 from your Staff Director, Mr. Orlando B. Potter, notifying me that a Statement of Organization was filed with the Federal Election Commission on July 6, 1979, by the "Independent Campaign to Elect William E. Simon President".

Pursuant to Section 100.2(c) of the Commission's regulations, 11 C.F.R. paragraph 100.2(c), I hereby disavow any activity on my behalf by the "Independent Campaign to Elect William E. Simon President".

Sincerely,



Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463  
att: Reports Analysis Division

62040344664

79031020955

FEDERAL ELECTION COMMISSION

APR 9 9:59 AM '79

1. (a) Name (as full) <b>Gabriel Pitcairn Pendleton</b>	2. Identification Number <b>2028</b>
(b) Address (number and street) <b>Cairnwood</b>	3. This is an Independent Expenditure: <input checked="" type="checkbox"/> In support of Federal candidates. <input type="checkbox"/> In opposition to Federal candidates.
(c) City, State and ZIP Code <b>Bryn Athyn, PA 19009</b>	
(d) Principal Place of Business <b>home</b>	(e) Occupation <b>housewife</b>

4. Type of Report (check appropriate box and complete)

(a)  Amendment for \_\_\_\_\_ (which report)  
 (b)  April 10 Quarterly Report  
 (c)  July 10 Quarterly Report  
 (d)  October 10 Quarterly Report  
 (e)  January 31 Year End Report

(f)  Tenth day report preceding \_\_\_\_\_ election on \_\_\_\_\_ in the State of \_\_\_\_\_  
 (primary, general or convention) (date)

(g)  Thirtieth day report following \_\_\_\_\_ election on \_\_\_\_\_ in the State of \_\_\_\_\_  
 (primary, general or convention) (date)

5. This report covers the period inception through March 31, 1979

Complete either Line 6 or Line 7 whichever is appropriate. **CONTRIBUTIONS**

Full Name, Mailing Address and ZIP Code of Payee	Particular of Expenditure	Date (month, day, year)	Amount	Name and Office Sought of Federal Candidate
<b>Gabriela Pitcairn Pendleton</b>	<b>personal accounts</b>	<b>3/23/79</b>	<b>\$300.00</b>	<b>William E. Simon President of the US</b>
		<b>3/26/79</b>	<b>\$300.00</b>	

Complete either Line 6 or Line 7 whichever is appropriate. **EXPENDITURES**

Full Name, Mailing Address and ZIP Code of Payee	Particular of Expenditure	Date (month, day, year)	Amount	Name and Office Sought of Federal Candidate
<b>CLCo, Inc. 1941 North Woodley Arlington, VA 22207</b>	<b>advertisement</b>	<b>3/26/79</b>	<b>\$300.00</b>	<b>William E. Simon President of the US</b>

8. TOTAL CONTRIBUTIONS ..... \$ 600.00

9. TOTAL EXPENDITURES ..... \$ 300.00

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, concert with, or at the request or suggestions of any candidate or any authorized committee or agent of such candidate or authorized committee. Furthermore, these expenditures did not involve the financing of dissemination, distribution, or republication in whole or in part of any campaign materials prepared by the candidate, his campaign committee, or their agent.

*C. C. Clinkscales, III*      April 6, 1979  
 Signature      Date

Subscribed and sworn to before me this 6<sup>TH</sup> day of APRIL, 1979

My Commission expires: \_\_\_\_\_  
*March J. Mahoney*  
 My Commission Expires March 31, 1982  
 NOTARY PUBLIC

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. Section 437g or Section 441j (See reverse side of form).

For further information Contact: Federal Election Commission  
 1325 K Street, N.W.  
 Washington, D.C. 20463  
 800-424-9530

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

209033465

REPORT OF INDEPENDENT EXPENDITURES  
 OR CONTRIBUTIONS BY PERSONS

RECEIVED 7(H)  
 FEDERAL ELECTION COMMISSION

(To be used by an individual or a person other than political committee)

79 JUL 6 P2:03

1. (a) Name (in full) <b>Gabriele Pitcairn Pendleton</b>	2. Identification Number <b>None</b>
(b) Address (number and street) <b>Cairnwood, Box 338</b>	3. This is an Independent Expenditure: <input type="checkbox"/> In support of Federal candidate. <input type="checkbox"/> In opposition to Federal candidate.
(c) City, State and ZIP Code <b>Bryn Athyn, PA 19009</b>	
(d) Principal Place of Business <b>home</b>	(e) Occupation <b>Housewife</b>

4. Type of Report (check appropriate box and complete)

(a)  Amendment for \_\_\_\_\_ (which reports) (d)  October 10 Quarterly Report  
 (b)  April 10 Quarterly Report (e)  January 31 Year End Report  
 (c)  July 10 Quarterly Report  
 (f)  Tenth day report preceding \_\_\_\_\_ election on \_\_\_\_\_ in the State of \_\_\_\_\_  
 (primary, general or convention) (date)  
 (g)  Thirtieth day report following \_\_\_\_\_ election on \_\_\_\_\_ in the State of \_\_\_\_\_  
 (primary, general or convention) (date)

5. This report covers the period 4/1/79 through 6/30/79

Complete either Line 6 or Line 7 whichever is appropriate. **CONTRIBUTIONS**

Full Name, Mailing Address and ZIP Code of Payor	Particular of Expenditure	Date (month, day, year)	Amount	Name and Office Sought of Federal Candidate
<b>Independent Campaign to Elect William E. Simon President P. O. Box 28260 Washington, D.C. 20005</b>	<b>Contribution</b>	<b>quarter</b>	<b>\$1,200.00</b>	<b>William E. Simon President</b>

Complete either Line 6 or Line 7 whichever is appropriate. **EXPENDITURES**

Full Name, Mailing Address and ZIP Code of Payor	Particular of Expenditure	Date (month, day, year)	Amount	Name and Office Sought of Federal Candidate

8. TOTAL CONTRIBUTIONS ..... \$ 1,200.00

9. TOTAL EXPENDITURES ..... \$ \_\_\_\_\_

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, concert with, or at the request or suggestions of any candidate or any authorized committee or agent of such candidate or authorized committee. Furthermore, these expenditures did not involve the financing of dissemination, distribution, or republication in whole or in part of any campaign materials prepared by the candidate, his campaign committee, or their agent.

Subscribed and sworn to before me this 29<sup>th</sup> day of June, 1979

My Commission expires: Philip A. Gusters  
 NOTARY PUBLIC

L.P. Whinnery, Jr. June 29, 1979  
 Signature Date

MY COMMISSION EXPIRES: JUNE 15, 1981

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. Section 437g or Section 441j (See reverse side of form).

For further information Contact: Federal Election Commission  
 1325 K Street, N.W.  
 Washington, D.C. 20463  
 800-424-9530

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

6204031013579



REPORT OF RECEIPTS AND DISBURSEMENTS  
For a Political Committee Other Than an Authorized Committee

RECEIVED  
7(N)  
'80 APR 18 4 12:46

(Summary Page)

1. Name of Committee (in Full)  
**Independent Campaign to Elect William E. Simon President**

Address (Number and Street)

P. O. Box 28290

City, State and ZIP Code

Washington, D.C. 20005

Check if address is different than previously reported.

2. FEC Identification Number

099001174 *099001174*

3.  This committee qualified as a multicandidate committee during this Reporting Period on \_\_\_\_\_ (date)

4. TYPE OF REPORT (check appropriate boxes)

- April 15 Quarterly Report
- July 15 Quarterly Report
- October 15 Quarterly Report
- January 31 Year End Report
- July 31 Mid Year Report (Non-election Year Only)
- Monthly Report for \_\_\_\_\_
- Twelfth day report preceding \_\_\_\_\_ (Type of Election) election on \_\_\_\_\_ in the State of \_\_\_\_\_
- Thirtieth day report following the General Election on \_\_\_\_\_ in the State of \_\_\_\_\_

Termination Report

(b) Is this Report an Amendment?  
 YES  NO

*3-T-01*  
*FFC = Q*

SUMMARY

5. Covering Period 1 January 80 Through 31 March 80

6. (a) Cash on Hand January 1, 1980 .....

(b) Cash on Hand at Beginning of Reporting Period .....

(c) Total Receipts (from Line 18) .....

(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B) .....

7. Total Disbursements (from Line 28) .....

8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d)) .....

9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D) .....

10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D) .....

	Column A This Period	Column B Calendar Year-to-Date
6(a)		\$ 9.53
6(b)	\$ 9.53	
6(c)	\$ 123.63	\$ 123.63
6(d)	\$ 133.16	\$ 133.16
7	\$ 132.16	\$ 132.16
8	\$ 1.00	\$ 1.00
9	\$ .00	
10	\$ 3,500.00	

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

For further information, contact

Federal Election Commission  
Toll Free 800-424-9530  
Local 202-523-4068

**C. C. Clinkscales, III**

Type or Print Name of Treasurer

*C. C. Clinkscales, III*  
SIGNATURE OF TREASURER

April 15, 1980

Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

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

--	--	--	--	--	--	--	--

FEC FORM 3X (3-30)

8 0 0 4 3 0 0 7 4 5 6 7 3

00 APR 18 PM 12:46

Name of Committee (in Full)  
*Independent Campaign to Elect William E. Simon President*

Report Covering the Period  
From: *1 January 68* To: *31 March 68*

**I. RECEIPTS**

**11. CONTRIBUTIONS (other than loans) FROM:**

- (a) Individuals/Persons Other Than Political Committees .....  
*(Name Every Unitemized \$\_\_\_\_\_)*
- (b) Political Party Committees .....
- (c) Other Political Committees .....
- (d) The Candidate .....
- (e) TOTAL CONTRIBUTIONS (other than loans) (add 11a, 11b, 11c and 11d) .....

**12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES .....**

**13. LOANS:**

- (a) Made or Guaranteed by the Candidate .....
- (b) All Other Loans .....
- (c) TOTAL LOANS (add 13a and 13b) .....

**14. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.) .....**

**15. OTHER RECEIPTS (Dividends, Interest, etc.) .....**

**16. TOTAL RECEIPTS (Add 11a, 12, 13c, 14 and 15) .....**

**II. DISBURSEMENTS**

**17. OPERATING EXPENDITURES .....**

**18. TRANSFERS TO OTHER AUTHORIZED COMMITTEES .....**

**19. LOAN REPAYMENTS:**

- (a) Of Loans Made or Guaranteed by the Candidate .....
- (b) Of All Other Loans .....
- (c) TOTAL LOAN REPAYMENTS (add 19a and 19b) .....

**20. REFUNDS OF CONTRIBUTIONS TO:**

- (a) Individuals/Persons Other Than Political Committees .....
- (b) Political Party Committees .....
- (c) Other Political Committees .....
- (d) TOTAL CONTRIBUTION REFUNDS (add 20a, 20b and 20c) .....

**21. OTHER DISBURSEMENTS .....**

**22. TOTAL DISBURSEMENTS (Add 17, 18, 19c, 20d and 21) .....**

**III. CASH SUMMARY**

- 23. CASH ON HAND AT BEGINNING OF THE REPORTING PERIOD ..... S
- 24. TOTAL RECEIPTS THIS PERIOD (From Line 16) ..... S
- 25. SUBTOTAL (Add Line 23 and Line 24) ..... S
- 26. TOTAL DISBURSEMENTS THIS PERIOD (From Line 22) ..... S
- 27. CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (Subtract Line 26 from 25) ..... S

	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
11. CONTRIBUTIONS (other than loans) FROM:		
(a) Individuals/Persons Other Than Political Committees	\$25.00	\$25.00
(b) Political Party Committees	.00	.00
(c) Other Political Committees	.00	.00
(d) The Candidate	.00	.00
(e) TOTAL CONTRIBUTIONS (other than loans)	25.00	25.00
12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES	.00	.00
13. LOANS:		
(a) Made or Guaranteed by the Candidate	.00	.00
(b) All Other Loans	.00	.00
(c) TOTAL LOANS	.00	.00
14. OFFSETS TO OPERATING EXPENDITURES	98.63	98.63
15. OTHER RECEIPTS	.00	.00
16. TOTAL RECEIPTS	123.63	123.63
II. DISBURSEMENTS		
17. OPERATING EXPENDITURES	132.16	132.16
18. TRANSFERS TO OTHER AUTHORIZED COMMITTEES	.00	.00
19. LOAN REPAYMENTS:		
(a) Of Loans Made or Guaranteed by the Candidate	.00	.00
(b) Of All Other Loans	.00	.00
(c) TOTAL LOAN REPAYMENTS	.00	.00
20. REFUNDS OF CONTRIBUTIONS TO:		
(a) Individuals/Persons Other Than Political Committees	.00	.00
(b) Political Party Committees	.00	.00
(c) Other Political Committees	.00	.00
(d) TOTAL CONTRIBUTION REFUNDS	.00	.00
21. OTHER DISBURSEMENTS	.00	.00
22. TOTAL DISBURSEMENTS	132.16	132.16

082 00 04 30 13 01 74 36 56 98 4

9.53
123.63
133.16
132.16
1.00

SCHEDULE A

ITEMIZED RECEIPTS

With column additions for each category of the General Summary Page

Any information copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (Do Not) *Independent Campaign to Elect William E. Simon President*

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
<i>None</i>	Occupation		,00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Aggregate Year-to-Date—\$			
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Aggregate Year-to-Date—\$			
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Aggregate Year-to-Date—\$			
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Aggregate Year-to-Date—\$			
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Aggregate Year-to-Date—\$			
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Aggregate Year-to-Date—\$			
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Aggregate Year-to-Date—\$			
SUBTOTAL of Receipts This Page (optional) .....			,00
TOTAL This Period (last page this line number only) .....			,00

6920004301304743656995



SCHEDULE B

ITEMIZED DISBURSEMENTS

Page 1 of 1 for  
 Line 13  
 (Use separate schedules for each category of the Detailed Summary Page)

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)  
**Independent Campaign to Elect William E. Simon President**

0 02 00 04 30 13 01 74 36 57 90 6

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
MCS Corp 1150 17th Street, NW Washington, DC 20036	Phone Charges Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	1-14-80	9.02
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
CLCo, Inc. 1941 N. Woodbury St Arlington, VA 22207	Prepare FEC Report Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	3-14-80	\$122.63
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
National Savings & Trust Company 155 E New York Avenue, NW Washington, D.C. 20005	Bank Charge Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	2-6-80	\$.51 (approx.)
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		

SUBTOTAL of Disbursements This Page (optional) ..... \$132.16  
 TOTAL This Period (last page this line number only) ..... \$132.16

Name of Commission (or Full)					
A. Full Name, Mailing Address and ZIP Code of Loan Source <i>Mrs. Gabriella Pitarino Poulletto</i> <i>Box 288</i> <i>Brigle Athyn, PA 19003</i> Election: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Original Amount of Loan <i>\$3,500.00</i>	Cumulative Payments To Date <i>.00</i>	Balance Outstanding at Close of This Period <i>\$3,500.00</i>		
Terms: Date Incurred _____ Date Due _____ Interest Rate _____ % (apr) <input type="checkbox"/> Secured					
List All Endorsers or Guarantors (if any) to Item A					
1. Full Name, Mailing Address and ZIP Code  <i>None</i>	Name of Employer  Occupation  Amount Guaranteed Outstanding: \$				
2. Full Name, Mailing Address and ZIP Code	Name of Employer  Occupation  Amount Guaranteed Outstanding: \$				
3. Full Name, Mailing Address and ZIP Code	Name of Employer  Occupation  Amount Guaranteed Outstanding: \$				
B. Full Name, Mailing Address and ZIP Code of Loan Source   Election: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):					
Terms: Date Incurred _____ Date Due _____ Interest Rate _____ % (apr) <input type="checkbox"/> Secured					
List All Endorsers or Guarantors (if any) to Item B					
1. Full Name, Mailing Address and ZIP Code	Name of Employer  Occupation  Amount Guaranteed Outstanding: \$				
2. Full Name, Mailing Address and ZIP Code	Name of Employer  Occupation  Amount Guaranteed Outstanding: \$				
3. Full Name, Mailing Address and ZIP Code	Name of Employer  Occupation  Amount Guaranteed Outstanding: \$				
SUBTOTALS This Period This Page (optional) .....					
TOTALS This Period (last page in this line only) .....					
Carry outstanding balance only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.					

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Name of Debtor (in Full) Independent Company to Elect William E. Simon President	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor  <div style="text-align: center; font-size: 2em; font-weight: bold;">None</div>				
Nature of Debt (Purpose):				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
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) .....				
2) TOTAL This Period (last page this line only) .....				
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only) .....				
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only) .....				

08 20 00 43 01 30 47 43 65 79 28



ITEMIZED INDEPENDENT EXPENDITURES

Page 1 of 1 Pages

Use Reverse Side for Instructions

Name of Committee (in Full)				I.D. No.
Independent Campaign to Elect William E. Simon <i>President</i>				099000174
Full Name, Mailing Address & ZIP Code of Each Payee	Purpose of Expenditure	Date (month, day, year)	Amount	Name of Federal Candidate Sustained or Opposed by the expenditure & office sought
None			1.00	<input type="checkbox"/> Support <input type="checkbox"/> Oppose
				<input type="checkbox"/> Support <input type="checkbox"/> Oppose
				<input type="checkbox"/> Support <input type="checkbox"/> Oppose
				<input type="checkbox"/> Support <input type="checkbox"/> Oppose
				<input type="checkbox"/> Support <input type="checkbox"/> Oppose
				<input type="checkbox"/> Support <input type="checkbox"/> Oppose
				<input type="checkbox"/> Support <input type="checkbox"/> Oppose
(a) SUBTOTAL of Itemized Independent Expenditures			\$ .00	
(b) SUBTOTAL of Unitemized Independent Expenditures			\$ 1.00	
(c) TOTAL Independent Expenditures			\$ 1.00	

6920004301304743657939

Under penalty of perjury, I certify that the independent expenditures reported herein were not made in cooperation, consultation, concert, with, or at the request or suggestion of any candidate or any authorized committee or agent of such candidate or authorized committee. Furthermore, these expenditures did not involve the financing of dissemination, distribution, or reproduction in whole or in part of any campaign materials prepared by the candidate, his campaign committee, or their agent.

Subscribed and sworn to before me this \_\_\_\_\_ day of \_\_\_\_\_, 19\_\_\_\_

My Commission expires \_\_\_\_\_

NOTARY PUBLIC

Signature \_\_\_\_\_

Date \_\_\_\_\_

**REPORT OF RECEIPTS AND DISBURSEMENTS**  
For a Political Committee Other Than an Authorized Committee

(Summary Page)

RECEIVED  
7(N)

80 APR 12 P12: 57

1. Name of Committee (in Full)  
**INDEPENDENT COMMITTEE TO ELECT WILLIAM E. SIMLIN PRESIDENT**

Address (Number and Street)  
**POST-OFFICE BOX "3"**

City, State and ZIP Code  
**BRYN ATHYN, PENNSYLVANIA, 19009**

Check if address is different than previously reported.

2. FEC Identification Number  
**C99001174**

3.  This committee qualified as a multicandidate committee during this Reporting Period on \_\_\_\_\_ (date)

4. TYPE OF REPORT (check appropriate boxes)

(a)  April 15 Quarterly Report Q1 '80  
 July 15 Quarterly Report  
 October 15 Quarterly Report  
 January 31 Year End Report  
 July 31 Mid Year Report (Non-election Year Only)  
 Monthly Report for \_\_\_\_\_  
 Twelfth day report preceding \_\_\_\_\_ (Type of Election) election on \_\_\_\_\_ in the State of \_\_\_\_\_  
 Thirtieth day report following the General Election on \_\_\_\_\_ in the State of \_\_\_\_\_  
 Termination Report

(b) Is this Report an Amendment?  
 YES  NO

62004301301742627144

SUMMARY		Column A	Column B
		This Period	Calendar Year-to-Date
5. Covering Period	<b>DEC 11, 1979 Through MAR 31, 1980</b>		
6. (a) Cash on Hand January 1, 19 <b>80</b>	.....	\$ 0	\$ 0
(b) Cash on Hand at Beginning of Reporting Period	.....	\$ 0	
(c) Total Receipts (from Line 18)	.....	\$ 5143.00	\$ 5143.00
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)	.....	\$ 5143.00	\$ 5143.00
7. Total Disbursements (from Line 28)	.....	\$ 4754.19	\$ 4754.19
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))	.....	\$ 388.81	\$ 388.81
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)	.....	\$ 0	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	.....	\$ 824.34	

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

For further information, contact:

**G. MORGAN JONES III**  
Type or Print Name of Treasurer

**G. Morgan Jones, III**  
SIGNATURE OF TREASURER

**4.8.80**  
Date

Federal Election Commission  
Toll Free 800-424-9530  
Local 202-623-4068

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

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

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FEC FORM 3X (3/80)

DETAILED SUMMARY PAGE  
of Receipts and Disbursements  
(Page 2, FEC FORM 3X)

Name of Committee (in Full)  
**INDEPENDENT COMMITTEE TO ELECT  
WILLIAM E. SIMON, PRESIDENT**

Report Covering the Period:

From: To:

**I. RECEIPTS**

**11. CONTRIBUTIONS (other than loans) FROM:**

(a) Individuals/Persons Other Than Political Committees

(Name Entry Unitized \$ \_\_\_\_\_)

(b) Political Party Committees

(c) Other Political Committees

(d) TOTAL CONTRIBUTIONS (other than loans) (add 11a, 11b and 11c)

**12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES**

**13. ALL LOANS RECEIVED**

**14. LOAN REPAYMENTS RECEIVED**

**15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Receipts, etc.)**

**16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES**

**17. OTHER RECEIPTS (Dividends, Interest, etc.)**

**18. TOTAL RECEIPTS (Add 11d, 12, 13, 14, 15, 16 and 17)**

**II. DISBURSEMENTS**

**19. OPERATING EXPENDITURES**

**20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES**

**21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES**

**22. INDEPENDENT EXPENDITURES (Use Schedule E)**

**23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. §441e(d)) (Use Schedule F)**

**24. LOAN REPAYMENTS MADE**

**25. LOANS MADE**

**26. REFUNDS OF CONTRIBUTIONS TO:**

(a) Individuals/Persons Other Than Political Committees

(b) Political Party Committees

(c) Other Political Committees

(d) TOTAL CONTRIBUTION REFUNDS (add 26a, 26b and 26c)

**27. OTHER DISBURSEMENTS**

**28. TOTAL DISBURSEMENTS (Add Lines 19, 20, 21, 22, 23, 24, 25, 26d and 27)**

**III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES**

**29. TOTAL CONTRIBUTIONS (other than loans) from Line 11d**

**30. TOTAL CONTRIBUTION REFUNDS from Line 26d**

**31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from Line 29)**

**32. TOTAL OPERATING EXPENDITURES from Line 19**

**33. OFFSETS TO OPERATING EXPENDITURES from Line 15**

**34. NET OPERATING EXPENDITURES (subtract Line 33 from Line 32)**

	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
11. CONTRIBUTIONS (other than loans) FROM:		
(a) Individuals/Persons Other Than Political Committees	5143.00	5143.00
(b) Political Party Committees	0	0
(c) Other Political Committees	0	0
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11a, 11b and 11c)	5143.00	5143.00
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES	0	0
13. ALL LOANS RECEIVED	0	0
14. LOAN REPAYMENTS RECEIVED	0	0
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Receipts, etc.)	0	0
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	0	0
17. OTHER RECEIPTS (Dividends, Interest, etc.)	0	0
18. TOTAL RECEIPTS (Add 11d, 12, 13, 14, 15, 16 and 17)	5143.00	5143.00
<b>II. DISBURSEMENTS</b>		
19. OPERATING EXPENDITURES	4754.19	4754.19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES	0	0
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	0	0
22. INDEPENDENT EXPENDITURES (Use Schedule E)	0	0
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. §441e(d)) (Use Schedule F)	0	0
24. LOAN REPAYMENTS MADE	0	0
25. LOANS MADE	0	0
26. REFUNDS OF CONTRIBUTIONS TO:		
(a) Individuals/Persons Other Than Political Committees	0	0
(b) Political Party Committees	0	0
(c) Other Political Committees	0	0
(d) TOTAL CONTRIBUTION REFUNDS (add 26a, 26b and 26c)	0	0
27. OTHER DISBURSEMENTS	0	0
28. TOTAL DISBURSEMENTS (Add Lines 19, 20, 21, 22, 23, 24, 25, 26d and 27)	4754.19	4754.19
<b>III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES</b>		
29. TOTAL CONTRIBUTIONS (other than loans) from Line 11d	5143.00	5143.00
30. TOTAL CONTRIBUTION REFUNDS from Line 26d	0	0
31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from Line 29)	5143.00	5143.00
32. TOTAL OPERATING EXPENDITURES from Line 19	4754.19	4754.19
33. OFFSETS TO OPERATING EXPENDITURES from Line 15	0	0
34. NET OPERATING EXPENDITURES (subtract Line 33 from Line 32)	4754.19	4754.19

080438255



SCHEDULE A

ITEMIZED RECEIPTS

2-CC  
 This receipt is required for each entry on the Candidate's Statement Page

Any information received from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full) **INDEPENDENT COMMITTEE TO ELECT WILLIAM E. SIMON (RESIDENT)**

A. Full Name, Mailing Address and ZIP Code <b>GABRIELE P. FENDLETON</b> 6TH FLOOR JENKINTOWN PLAZA JENKINTOWN, PENNSYLVANIA, 19046	Name of Employer NONE	Date (month, day, year) 12.13.79	Amount of Each Receipt This Period <del>1000.00</del>
	Occupation HOUSEWIFE	Aggregate Year-to-Date-\$ 1000.00	
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			

B. Full Name, Mailing Address and ZIP Code <b>JERRY D. EASTMAN</b> BOX 533 HAMPSTEAD N-H 03841	Name of Employer EASTMAN AIRLINES	Date (month, day, year) 12/13/79	Amount of Each Receipt This Period 25.00
	Occupation PILOT	Aggregate Year-to-Date-\$ 25.00	
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			

C. Full Name, Mailing Address and ZIP Code <b>RICHARD G. GIBELL</b> RFD #1 BOX 136 CENTER HARBOR N.H. 03226	Name of Employer RETIRED.	Date (month, day, year) 12/13/79	Amount of Each Receipt This Period 25.00
	Occupation UNKNOWN	Aggregate Year-to-Date-\$ 25.00	
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			

D. Full Name, Mailing Address and ZIP Code <b>JOHN K. SKELTON</b> P.O. BOX 934 WOLFEBORO N.H. 03894	Name of Employer N/A	Date (month, day, year) 12/13/79	Amount of Each Receipt This Period 25.00
	Occupation UNKNOWN	Aggregate Year-to-Date-\$ 25.00	
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			

E. Full Name, Mailing Address and ZIP Code <b>GABRIELE P. FENDLETON</b> 6TH FLOOR JENKINTOWN PLAZA JENKINTOWN, PENNSYLVANIA, 19046	Name of Employer NONE	Date (month, day, year) 1.23.80	Amount of Each Receipt This Period <del>300.00</del>
	Occupation HOUSEWIFE	Aggregate Year-to-Date-\$ 1300.00	
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			

F. Full Name, Mailing Address and ZIP Code <b>CATHLEEN BURNS ELMER</b> RFD CAMPTON THORNTON N.H. 03223	Name of Employer UNKNOWN	Date (month, day, year) 1.23.80	Amount of Each Receipt This Period 25.00
	Occupation UNKNOWN	Aggregate Year-to-Date-\$ 25.00	
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			

G. Full Name, Mailing Address and ZIP Code <b>ROBERT W. THURSTON</b> NEW LONDON N.H. 03257	Name of Employer UNKNOWN	Date (month, day, year) 1.23.80	Amount of Each Receipt This Period 3.00
	Occupation UNKNOWN	Aggregate Year-to-Date-\$ 3.00	
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			

SUBTOTAL of Receipts This Page (optional) ..... **1403.00**

TOTAL This Period (last page this line number only) .....

040931978266

SCHEDULE A

ITEMIZED RECEIPTS

Use separate statements for each category of the Donor's Summary Page

Any information coming from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full): **INDEPENDENT COMMITTEE TO ELECT WILLIAM E SIMEN, PRESIDENT**

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
MRS. THA F. KENNEDY 1105 SPRUCE STREET PHILADELPHIA, PA. 19103	TEMPLE UNIVERSITY SECRETARY	1-23-80	25.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Aggregate Year-to-Date-\$			
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
FRANK A. MORRISON RD. 1 NEW MARKET NH 03857	UNKNOWN	1-23-80	10.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Aggregate Year-to-Date-\$ 10.00			
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
JOSEPH A. G. ALLAGHER VALLEY ASSOCIATES PUBLIC AFFAIRS COMMITTEE JENKINTOWN PA 19046	I.V. BANK	1-23-80	<del>250.00</del>
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Aggregate Year-to-Date-\$ 250.00			
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
GABRIELE P. VENOULETON 6th FLOOR JENKINTOWN PLAZA JENKINTOWN, PA. 19046	NONE	2-12-80	<del>300.00</del>
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Aggregate Year-to-Date-\$ 1600.00			
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
GERALD A. D'AMALLO 160 OVERLOOK AVENUE HACKENSACK, N.J. 07601	UNKNOWN	2-25-80	5.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Aggregate Year-to-Date-\$ 5.00			
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
CHARLES J. ANDERSON 50 DELAWARE MANAGEMENT CO. NO. 7. PENN CENTER PLAZA PHILADELPHIA, PA. 19103	DELAWARE MANAGEMENT CO.	2-25-80	50.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Aggregate Year-to-Date-\$ 50.00			
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
GABRIELE P. VENOULETON 6th FLOOR JENKINTOWN PLAZA JENKINTOWN PA 19046	NONE	2-25-80	<del>2000.00</del>
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Aggregate Year-to-Date-\$ 3600.00			
SUBTOTAL of Receipts This Page (optional)			2640.00
TOTAL This Period (last page this line number only)			

08093607277







C99001174  
**INDEPENDENT COMMITTEE TO ELECT WILLIAM  
 E SIMON PRESIDENT**  
 PO BOX 5  
 BRYN ATHYN PA 19009

City, State and ZIP Code

Check if address is different than previously reported.

2. FEC Identification Number  
 C 99001174

3.  This committee-qualified as a multicandidate committee during this Reporting Period on \_\_\_\_\_ (date)

4. TYPE OF REPORT (check appropriate boxes)
- (a)  April 15 Quarterly Report  
 July 15 Quarterly Report  
 October 15 Quarterly Report  
 January 31 Year End Report  
 July 31 Mid Year Report (Non-election Year Only)  
 Monthly Report for \_\_\_\_\_  
 Twelfth day report preceding \_\_\_\_\_ (Type of Election) election on \_\_\_\_\_ in the State of \_\_\_\_\_  
 Thirtieth day report following the General Election on \_\_\_\_\_ in the State of \_\_\_\_\_  
 Termination Report
- (b) Is this Report an Amendment?  
 YES  NO

8204314A0787

5. Covering Period	SUMMARY	
	Column A This Period	Column B Calendar Year-to-Date
APRIL 1, 1980 Through JUNE 30, 1980		NEW COMMITTEE
6. (a) Cash on Hand January 1, 1980		\$ 0
(b) Cash on Hand at Beginning of Reporting Period	\$ 388.81	
(c) Total Receipts (from Line 1B)	\$ 2100.00	\$ 7643.00
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)	\$ 2488.81	\$ 7643.00
7. Total Disbursements (from Line 2B)	\$ 2469.73	\$ 7223.92
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))	\$ 19.08	\$ 19.08
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)	\$ 0	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	\$ 0	

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

For further information, contact:

**G. MORGAN JONES, III**  
 Type or Print Name of Treasurer

Federal Election Commission  
 Toll Free 800-424-6630  
 Local 202-623-4088

*G. Morgan Jones, III*  
 SIGNATURE OF TREASURER

7.10.80  
 Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

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

MT 7-11	MT 7-17	DS 7-17	MT 7-17	MT 7-17			
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Name of Committee or Fund  
**THE SIMON COMMITTEE**

Report Covering the Period  
From **7-1-80** To **6-30-80**

	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
<b>I. RECEIPTS</b>		
<b>11. CONTRIBUTIONS (other than loans) FROM:</b>		
(a) Individuals/Persons Other Than Political Committee	2100.00	7643.00
(Many Entry Unsubmitted)		
(b) Political Party Committees		
(c) Other Political Committees		
(d) <b>TOTAL CONTRIBUTIONS</b> (other than loans) (add 11a, 11b and 11c)	2100.00	7643.00
<b>12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES</b>	0	0
<b>13. ALL LOANS RECEIVED</b>	0	0
<b>14. LOAN REPAYMENTS RECEIVED</b>	0	0
<b>15. OFFSETS TO OPERATING EXPENDITURES</b> (Refunds, Rebates, etc.)	0	0
<b>16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES</b>	0	0
<b>17. OTHER RECEIPTS</b> (Dividends, Interest, etc.)	0	0
<b>18. TOTAL RECEIPTS</b> (Add 11d, 12, 13, 14, 15, 16 and 17)	2100.00	7643.00
<b>II. DISBURSEMENTS</b>		
<b>19. OPERATING EXPENDITURES</b>	2469.73	7223.92
<b>20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES</b>	0	0
<b>21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES</b>	0	0
<b>22. INDEPENDENT EXPENDITURES</b> (Use Schedule E)	0	0
<b>23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES</b> (2 U.S.C. §441e(d)) (Use Schedule F)	0	0
<b>24. LOAN REPAYMENTS MADE</b>	0	0
<b>25. LOANS MADE</b>	0	0
<b>26. REFUNDS OF CONTRIBUTIONS TO:</b>		
(a) Individuals/Persons Other Than Political Committee	0	0
(b) Political Party Committees	0	0
(c) Other Political Committees	0	0
(d) <b>TOTAL CONTRIBUTION REFUNDS</b> (add 26a, 26b and 26c)	0	0
<b>27. OTHER DISBURSEMENTS</b>	0	0
<b>28. TOTAL DISBURSEMENTS</b> (Add Lines 19, 20, 21, 22, 23, 24, 25, 26d and 27)	2469.73	7223.92
<b>III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES</b>		
<b>29. TOTAL CONTRIBUTIONS</b> (other than loans) from Line 11d	2100.00	7643.00
<b>30. TOTAL CONTRIBUTION REFUNDS</b> from Line 26d	0	0
<b>31. NET CONTRIBUTIONS</b> (other than loans) (subtract Line 30 from Line 29)	2100.00	7643.00
<b>32. TOTAL OPERATING EXPENDITURES</b> from Line 19	2469.73	7223.92
<b>33. OFFSETS TO OPERATING EXPENDITURES</b> from Line 15	0	0
<b>34. NET OPERATING EXPENDITURES</b> (subtract Line 33 from Line 32)	2469.73	7223.92

6 28 00 41 03 31 41 41 60 88 05 9

Any information copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full) **THE SIMON COMMITTEE**

0 48 00 4 03 4 1 4 67 88 15 0

A. Full Name, Mailing Address and ZIP Code <b>GABRIELE P. PENDLETON</b> <b>6th FLOOR JENKINTOWN PLAZA</b> <b>JENKINTOWN, PA, 19046</b>	Name of Employer <b>NONE</b>	Date (month, day, year) <b>5.3.80</b>	Amount of Each Receipt This Period <b>300.00</b>
	Occupation <b>HOUSEWIFE</b>	Aggregate Year-to-Date-\$ <b>4500.00</b>	
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):			

B. Full Name, Mailing Address and ZIP Code <b>GABRIELE P. PENDLETON</b> <b>6th FLOOR JENKINTOWN PLAZA</b> <b>JENKINTOWN, PA, 19046</b>	Name of Employer <b>NONE</b>	Date (month, day, year) <b>6.2.80</b>	Amount of Each Receipt This Period <b>300.00</b>
	Occupation <b>HOUSEWIFE</b>	Aggregate Year-to-Date-\$ <b>4800.00</b>	
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):			

C. Full Name, Mailing Address and ZIP Code <b>G. MORGAN JONES, III</b> <b>761 FETTERS MILL ROAD</b> <b>HUNTINGDON VALLEY, PA, 19006</b>	Name of Employer <b>G. B. M. + B.</b>	Date (month, day, year) <b>6.3.80</b>	Amount of Each Receipt This Period <b>500.00</b>
	Occupation <b>EXECUTIVE</b>	Aggregate Year-to-Date-\$ <b>500.00</b>	
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):			

D. Full Name, Mailing Address and ZIP Code <b>GABRIELE P. PENDLETON</b> <b>6th FLOOR JENKINTOWN PLAZA</b> <b>JENKINTOWN PA, 19046</b>	Name of Employer <b>NONE</b>	Date (month, day, year) <b>6.19.80</b>	Amount of Each Receipt This Period <b>1000.00</b>
	Occupation <b>HOUSEWIFE</b>	Aggregate Year-to-Date-\$ <b>5800.00</b>	
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):			

E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation	Aggregate Year-to-Date-\$	
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			

F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation	Aggregate Year-to-Date-\$	
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			

G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation	Aggregate Year-to-Date-\$	
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			

SUBTOTAL of Receipts This Page (optional) .....

TOTAL This Period (last page this line number only) ..... **2100.00**



Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)  
**THE SIMON COMMITTEE**

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A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
BELL TELEPHONE CO Box 280 CONSHOHOCKEN, PA, 19429	TELEPHONE EXP. Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	4.10.80	75.12
B. Full Name, Mailing Address and ZIP Code CONCORD MONITOR CONCORD NH 03301	NEWSPAPER EXP. Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	4.10.80	22.16
C. Full Name, Mailing Address and ZIP Code BERKELEY PUBLISHING CO LYNDHURST N. J. 07071	BOOKS EXP. Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	4.10.80	128.40
D. Full Name, Mailing Address and ZIP Code G. MORGAN JONES 761 FETTERS MILL RD. HUNTINGDON VALLEY, PA, PA	TRAVEL EXPENSE REIMBURSEMENT Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	4.18.80	100.00
E. Full Name, Mailing Address and ZIP Code AMTRAK WASHINGTON DC, 20013	RAIL TICKET EXP. Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	4.21.80	38.50
F. Full Name, Mailing Address and ZIP Code AT YOUR SERVICE INC 608 H ST. S.W. WASHINGTON D.C. 20024	MAIL & PHONE ANSWERING EXP. Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	5.1.80	160.00
G. Full Name, Mailing Address and ZIP Code AMERICAN LEAGUE OF LOBBYISTS WASHINGTON DC 20024	BKFAST MEETING EXPENSES Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	5.9.80	61.00
H. Full Name, Mailing Address and ZIP Code G. MORGAN JONES 761 F.M. RD. H.V. PA. 19006	TRAVEL EXPENSE REIMBURSEMENT Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	5.9.80	100.00
I. Full Name, Mailing Address and ZIP Code BELL TELEPHONE CO Box 280 CONSHOHOCKEN, PA, 19429	TELEPHONE EXPENSE Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	5.15.80	71.06
SUBTOTAL of Disbursements This Page (optional) .....			756.24
TOTAL This Period (last page this line number only) .....			

SCHEDULE B

ITEMIZED DISBURSEMENTS

Page 2 of 2  
 LINE NUMBER  
 Also amounts scheduled for each category of the Detailed Summary Page)

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)			
<b>THE SIMON COMMITTEE</b>			
A. Full Name, Mailing Address and ZIP Code D.C. TREASURER WASHINGTON D.C.	Purpose of Disbursement <b>LICENSE FEE EXPENSE</b> Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) <b>5.15.80</b>	Amount of Each Disbursement This Period <b>10.00</b>
B. Full Name, Mailing Address and ZIP Code G. MORGAN JONES 761 F.M. RD. H.V. PA. 19006	Purpose of Disbursement <b>TRAVEL EXPENSE REIMBURSEMENT</b> Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) <b>5.28.80</b>	Amount of Each Disbursement This Period <b>200.00</b>
C. Full Name, Mailing Address and ZIP Code NORTHWEST ORIENT AIRLINES PHILADELPHIA, PA.	Purpose of Disbursement <b>AIRLINE TICKET EXPENSE</b> Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) <b>5.29.80</b>	Amount of Each Disbursement This Period <b>208.00</b>
D. Full Name, Mailing Address and ZIP Code AMTRAK WASHINGTON DC 20013	Purpose of Disbursement <b>RAIL TICKET EXP.</b> Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) <b>6.3.80</b>	Amount of Each Disbursement This Period <b>40.50</b>
E. Full Name, Mailing Address and ZIP Code AT YOUR SERVICE INC 608 H ST S.W. WASHINGTON DC 20024	Purpose of Disbursement <b>MAIL TELEPHONE ANSWERING EXP.</b> Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) <b>6.3.80</b>	Amount of Each Disbursement This Period <b>50.00</b>
F. Full Name, Mailing Address and ZIP Code BELL TELEPHONE CO BOX 280 CONSHOHOCKEN, PA. 19429	Purpose of Disbursement <b>TELEPHONE EXP.</b> Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) <b>6.10.80</b>	Amount of Each Disbursement This Period <b>94.50</b>
G. Full Name, Mailing Address and ZIP Code REPUBLICAN STATE COMM. OF PENNSYLVANIA HARRISBURG PA. 17120	Purpose of Disbursement <b>HOTEL ROOM EXPENSE</b> Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) <b>6.11.80</b>	Amount of Each Disbursement This Period <b>150.00</b>
H. Full Name, Mailing Address and ZIP Code G. MORGAN JONES 761 F.M. RD. H.V. PA. 19006	Purpose of Disbursement <b>TRAVEL EXPENSE REIMBURSEMENT</b> Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) <b>6.18.00</b>	Amount of Each Disbursement This Period <b>500.00</b>
I. Full Name, Mailing Address and ZIP Code AMTRAK WASHINGTON DC 20013	Purpose of Disbursement <b>RAIL TICKET EXP.</b> Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) <b>6.24.80</b>	Amount of Each Disbursement This Period <b>40.50</b>
SUBTOTAL of Disbursements This Page (optional) .....			<b>1293.50</b>
TOTAL This Period (last page this line number only) .....			

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Name of Committee (in Full)			
THE SIMON COMMITTEE			
A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
POSTMASTER - BRYN ATHYN BRYN ATHYN, PA. 19009	POSTAGE EXPENSE Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	6-27-80	30.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
MORGAN STATIONERY CO 35 S. YORK ROAD. HATBORO PA, 19040	STAT. SUPPLY EXP. Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	6-27-80	9.94
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
CRAFT TRAVEL CO OBINGTON PA 19001	AIRLINE TICKET EXP. Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	6-30-80	220.00
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
MORGAN PRINTING CO. 40 S. YORK RD. HATBORO PA, 19040	PRINTING EXPENSE Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	6-30-80	151.05
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
CONCORD NATIONAL BANK MAIN STREET CONCORD, N.H. 03301	BANKING CHARGES SERVICE EXPENSE Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	6-30-80	9.00
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
SUBTOTAL of Disbursements This Page (optional) .....			419.99
TOTAL This Period (last page this line number only) .....			2469.73

0 28 09 40 03 31 11 41 60 88 46 2



**FORM OF RECEIPTS AND DISBURSEMENTS**  
For a Political Committee Other Than an Authorized Committee

7(P)

OCT 14 P 2:11

(Sum) (gs)

**1. Name of Committee (in Full)**

C99001174  
**THE SIMON COMMITTEE**

PO BOX 5  
BRYN ATHYN PA 19009

City, State and ZIP Code

Check if address is different than previously reported.

**2. FEC Identification Number**

C99001174

This committee qualified as a multicandidate committee during this Reporting Period on \_\_\_\_\_ (Date)

**TYPE OF REPORT (check appropriate boxes)**

- (a)  April 15 Quarterly Report
- July 15 Quarterly Report
- October 15 Quarterly Report**
- January 31 Year-End Report
- July 31 Mid Year Report (Non-election Year Only)
- Monthly Report for \_\_\_\_\_
- Twelfth day report preceding \_\_\_\_\_ (Type of Election) election on \_\_\_\_\_ in the State of \_\_\_\_\_
- Thirtieth day report following the General Election on \_\_\_\_\_ in the State of \_\_\_\_\_
- Termination Report

03 '80

(b) Is this Report an Amendment?  
 YES  NO

8 204031468540

**SUMMARY**

5. Covering Period JULY 1, 1980 Through SEPT 30, 1980

6. (a) Cash on Hand January 1, 1980

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 18)

(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)

7. Total Disbursements (from Line 28)

8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))

9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)

10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)

	Column A This Period	Column B Calendar Year-to-Date NEW COMMITTEE
6(a)		\$ 0
6(b)	\$ 19.08	
6(c)	\$ 7137.00	\$ 14780.00
6(d)	\$ 7156.08	\$ 14780.00
7	\$ 6811.83	\$ 14035.75
8	\$ 344.35	\$ 344.35
9	\$ 0	
10	\$ 0	

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

G. MORGAN JONES, III

Type or Print Name of Treasurer

G. Morgan Jones, III

SIGNATURE OF TREASURER

10-10-80  
Date

For further information, contact:

Federal Election Commission  
Toll Free 800-424-9530  
Local 202-623-4068

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

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

MT									
10-11									

FEC FORM 3X (3/80)

80 OCT 14 P 2 11

Name of Committee (in Full) **THE SIMON COMMITTEE**

Report Covering the Period: From **JUL 1** To **SEP 30 1980**

6 2 0 4 8 3 1 4 6 8 6 4 1

**I. RECEIPTS**

11. CONTRIBUTIONS (other than loans) FROM:
- (a) Individuals/Persons Other Than Political Committees
  - (b) Political Party Committees
  - (c) Other Political Committees
  - (d) TOTAL CONTRIBUTIONS (other than loans) (add 11a, 11b and 11c)
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES
13. ALL LOANS RECEIVED
14. LOAN REPAYMENTS RECEIVED
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES
17. OTHER RECEIPTS (Dividends, Interest, etc.)
18. TOTAL RECEIPTS (Add 11d, 12, 13, 14, 15, 16 and 17)

COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
7137.00	14,780.00
0	0
0	0
0	0
0	0
0	0
0	0
7137.00	14,780.00

**II. DISBURSEMENTS**

19. OPERATING EXPENDITURES
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES
22. INDEPENDENT EXPENDITURES (Use Schedule E)
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. §441a(d)) (Use Schedule F)
24. LOAN REPAYMENTS MADE
25. LOANS MADE
26. REFUNDS OF CONTRIBUTIONS TO:
- (a) Individuals/Persons Other Than Political Committees
  - (b) Political Party Committees
  - (c) Other Political Committees
  - (d) TOTAL CONTRIBUTION REFUNDS (add 26a, 26b and 26c)
27. OTHER DISBURSEMENTS
28. TOTAL DISBURSEMENTS (Add Lines 19, 20, 21, 22, 23, 24, 25, 26d and 27)

6811.83	14,035.75
0	0
0	0
0	0
0	0
0	0
0	0
0	0
0	0
0	0
0	0
0	0
6811.83	14,035.75

**III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES**

29. TOTAL CONTRIBUTIONS (other than loans) from Line 11d
30. TOTAL CONTRIBUTION REFUNDS from Line 26d
31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from Line 29)
32. TOTAL OPERATING EXPENDITURES from Line 19
33. OFFSETS TO OPERATING EXPENDITURES from Line 15
34. NET OPERATING EXPENDITURES (subtract Line 33 from Line 32)

7137.00	14,780.00
0	0
7137.00	14,780.00
6811.83	14,035.75
0	0
6811.83	14,035.75

Any information copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such contributors.

Name of Committee (in Full) **THE SIMON COMMITTEE**

0204031146864?

A. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
GABRIELE P. PENOLETON 6th FLOOR JENKINTOWN PLAZA JENKINTOWN, PA, 19046		NONE	7.7-80	300.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation HOUSEWIFE	Aggregate Year-to-Date-\$ 5800.00	
B. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
G. MORGAN JONES III 761 FATTERS MILL ROAD MONTICELLO VALLEY, PA, 19006		G. B. M. + B. WASHINGTON, D.C.	7.7-80	1500.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation EXECUTIVE.	Aggregate Year-to-Date-\$ 500.00	
C. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
REPUBLICAN STATE COMMITTEE LOUISE H. RUSSELL. HARRISBURG PA, 17120		REFUND.	7.11-80	.50.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation HOUSEWIFE	Aggregate Year-to-Date-\$	
D. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
GABRIELE P. PENOLETON 6th FLOOR JENKINTOWN PLAZA JENKINTOWN PA, 19046		NONE	7.22-80	3000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation HOUSEWIFE	Aggregate Year-to-Date-\$ 6200.00	
E. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
GABRIELE P. PENOLETON 6th FLOOR JENKINTOWN PLAZA JENKINTOWN, PA, 19046		NONE	9.3-80	1487.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation HOUSEWIFE	Aggregate Year-to-Date-\$ 9200.00	
F. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
JOE BAKER ASSOC OF WALL + CEILING INDUSTRIES INTERNATIONAL WASHINGTON, D.C. 20024		AICW.	9.3-80	500.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation EXECUTIVE	Aggregate Year-to-Date-\$ 500.00	
G. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
GABRIELE P. PENOLETON 6th FLOOR JENKINTOWN PLAZA JENKINTOWN PA, 19046		NONE	9.8-80	300.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation HOUSEWIFE	Aggregate Year-to-Date-\$ 10,687.00	
SUBTOTAL of Receipts This Page (optional) .....				7137.00
TOTAL This Period (last page this line number only) .....				7137.00



SCHEDULE B

ITEMIZED DISBURSEMENTS

LINE NUMBER 1  
 (Use separate schedule for each category of the Classified Summary Page)

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)

THE SIMON COMMITTEE

6 250 4033 414608684 3

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
POSTMASTER BRYN ATHYN, PA, 19009	POSTAGE Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	7.1.80	30.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A+ YOUR SERVICE INC WASHINGTON, DC 20024	MAIL ANS EXP. Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	7.2.80	50.00
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
LOUISE H. RUSSELL HARRISBURG, PA, 17120	TRANSPORTATION Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	7.2.8	171.60
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
LOUISE H. RUSSELL HARRISBURG PA, 17120	AIR FARE Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	7.2.80	682.00
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
AL RICE PRODUCTIONS LIVONIA, MICH, 48918	MUSIC EXP. Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	7.7.80	70.00
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
BRYN ATHYN POSTMASTER BRYN ATHYN PA, 19009	POSTAGE Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	7.8.80	56.00
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
CRAFT TRAVEL ABINGTON, PA, 19001	AIR FARE Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	7.9.80	968.00
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Bell Telephone Pa. CONSHOHOCKEN, PA, 19429	Telephone Exp. Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	7.9.80	45.19
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
GAIL + RICE PRODUCTIONS LIVONIA, MICH, 48918	MUSIC EXP. Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	7.9.80	65.00
SUBTOTAL of Disbursements This Page (optional) .....			2,137.79
TOTAL This Period (last page this line number only) .....			

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Name of Committee (In Full)			
<b>THE SIMON COMMITTEE</b>			
A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
HYATT REGENCY HOTEL DEARBORN, MICH. 48918	Hotel Room Exp. Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	7.12.80	752.80
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
G. MORGAN JONES III HUNTINGDON VALLEY, PA, 19006	EXPENSE REIMB. Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	7.12.80	300.00
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
BELL TELEPHONE/PA. CONSHOHOCKEN, PA, 19429	TELEPHONE EXP Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	8.15.80	161.30
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
DETROIT PLAZA HOTEL DETROIT, MICH, 48203	RECEPTION EXP. Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	8.15.80	544.20
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
AT YOUR SERVICE INC WASHINGTON DC 20024	MAIL + PHONE EXP. Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	8.15.80	90.00
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
DETROIT PLAZA HOTEL DETROIT, MICH. 48203	RECEPTION EXP. Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	8.28.80	2000.00
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
AM ASSOC EXECS. SOCIETY WASHINGTON, D.C. 20024	BOOKS EXP. Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	8.28.80	25.00
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
G. MORGAN JONES II HUNTINGDON VALLEY, PA, 19006	TRAVEL EXP. Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	8.28.80	50.00
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
G. MORGAN JONES III HUNTINGDON VALLEY PA, 19006	EXP. REIMB. Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	8.28.80	500.00
SUBTOTAL of Disbursements This Page (optional) .....			4,423.30
TOTAL This Period (last page this line number only) .....			

0 2 0 0 4 0 3 3 1 4 6 8 6 9 4 1



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Name of Committee (in Full)  
**THE SIMON COMMITTEE**

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
TREASURER CITY OF HARRISBURG HARRISBURG, PA, 17120	LIC Fee Exp. Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	9.28.80	6.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
BELL TELEPHONE /PA CONSHOHOCKEN, PA, 19429	Telephone Exp. Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	9.28.80	56.54
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
BELL TELEPHONE, /PA. CONSHOHOCKEN, PA, 19429	Telephone Exp. Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	9.28.80	149.20
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
POSTMASTER, BRYN ATHYN, PA, 19009	POSTAGE. EXP. Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	9.28.80	20.00
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
CONCORD NATIONAL BANK CONCORD N.H. 03301	BANK CHARGE EXP. Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	9.28.80	19.00
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
SUBTOTAL of Disbursements This Page (optional) .....			250.74
TOTAL This Period (last page this line number only) .....			6811.83

0289348645



**ATTACHMENT #2: PROPOSED LETTERS AND NOTIFICATIONS**

62040344691



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

G. Morgan Jones, III, Treasurer  
The Simon Committee  
P.O. Box 5  
Bryn Athyn, Pennsylvania 19009

Re: MUR 1378

Dear Mr. Jones:

On , 1981, the Federal Election Commission determined that there is reason to believe that your committee violated 2 U.S.C. §§ 434(a)(4)(A)(i) and 441a(f), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act") and sections 110.11 and 110.12 of the Commission's regulations. The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Where appropriate, statements should be submitted under oath.

In the absence of any additional information which demonstrates that no further action should be taken against your committee, the Commission may find probable cause to believe that a violation has occurred and proceed with formal conciliation. Of course, this does not preclude the settlement of this matter through informal conciliation prior to a finding of probable cause to believe if you so desire.

The investigation now being conducted will be confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

02040344692

G. Morgan Jones, III, Treasurer  
Page 2

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Marybeth Tarrant, the staff member assigned to this matter, at 202/523-4175.

Sincerely,

Enclosures

General Counsel's Factual and Legal Analysis  
Procedures

82040344693



FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE \_\_\_\_\_

MUR NO. 1378  
STAFF MEMBER(S) & TEL. NO.  
Marybeth Tarrant

RESPONDENT The Simon Committee

(202) 523-4175

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

This matter was referred to the Office of General Counsel by the Reports Analysis Division and involves possible violations of 2 U.S.C. §§ 434(a)(4)(A)(i), 441a(f) and 11 C.F.R. §§ 104.11, 104.12 by The Simon Committee.

FACTUAL BASIS AND LEGAL ANALYSIS

On April 8, 1979, Gabriele Pitcairn Pendleton filed an Independent Expenditure Report (Form 5) reporting \$600 in contributions and \$300 in expenditures on behalf of William E. Simon. On July 6, 1979, Mrs. Pendleton filed another Form 5, this time reporting \$1,200 in contributions to the Independent Campaign to Elect William E. Simon President (the Committee). On that same day, the Committee registered and filed a July 10 Quarterly Report with the Commission. The Committee's chairman was Mrs. Pendleton and the treasurer was C.C. Clinkscales, III. In reply to a letter from the Commission regarding the Committee, RAD received a disavowal letter from Mr. Simon on August 10, 1979.

The Committee's first report disclosed a beginning cash on hand of \$300 and contributions totalling \$1,200 from

62040344694

Mrs. Pendleton although her aggregate total read \$1,800. <sup>1/</sup> The next report filed, the October 10, 1979 Quarterly Report, disclosed another \$1,607.50 in contributions from Mrs. Pendleton in addition to a \$3,500 loan from her to the Committee. This loan was not reflected in Mrs. Pendleton's aggregate contribution total as reported by the Committee. The Year End Report revealed another \$2,044 in contributions from Mrs. Pendleton and the \$3,500 loan as still outstanding. Thus, it appeared Mrs. Pendleton's contribution total to the Committee for 1979 was \$8,951.50.

Prior to the Commission's receipt of the Year End Report, Mr. G. Morgan Jones, III, the National Campaign Director, filed a Statement of Organization amendment which changed the name of the Committee slightly and also changed the mailing address from Washington, D.C. to Bryn Athyn, Pa.

On February 15, 1980, a Request for Additional Information (RFAI) was sent to Mr. Clinkscales advising him of a possible violation of 2 U.S.C. § 441a by Mrs. Pendleton. RAD also requested clarification of certain discrepancies in the reports and asked the Committee to disclose the source of its cash on hand.

On March 6, 1980, Mr. Jones called RAD to say that Mr. Clinkscales, who was no longer treasurer, would not release the records of the Committee and, therefore, it was impossible to answer the RFAI. It was suggested to Mr. Jones that he write a letter to the Commission explaining the circumstances and that he should obtain copies of the back reports in order to comply with the RFAI.

On March 10, 1980, a second letter went out to the Committee, this time addressed to Mr. Jones, regarding the Committee's lack of response and informing Mr. Jones of possible legal action. While Mr. Jones did subsequently file a Statement of Organization amendment naming him the treasurer, no response was made to the RFAI.

On April 12, 1980, an April 15, 1980 Quarterly Report was filed by Mr. Jones. This report covered the period from 12/11/79 to 3/31/80 and disclosed more contributions from Mrs. Pendleton, including one for \$1,000 which was made on 12/13/79, thus bringing her total for 1979 to \$9,951.50.

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<sup>1/</sup> It thus appears that the \$600 in contributions reported by Mrs. Pendleton on her filing in April were contributions to the Committee and, therefore, she is the source of the \$300 cash on hand. Apparently, \$300 was spent out of the \$600 originally contributed.

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The report made no mention of the \$3,500 loan from Mrs. Pendleton but rather reported outstanding debts of \$824.34 in addition to \$388.81 as cash on hand at the end of the reporting period.

Shortly after this filing, Mr. Clinkscales filed an April 15, 1980 Quarterly Termination Report which reported a \$1.00 cash on hand and an outstanding debt of \$3,500 owed to Mrs. Pendleton. This was the last report filed by Mr. Clinkscales.

On April 23, 1980, a RAD analyst called Mr. Jones who stated that Mr. Clinkscales would still not hand over the records. Mr. Jones was told that an attempt should be made to refund the excessive amount to Mrs. Pendleton. It was further suggested that an explanatory letter be sent to the Commission. As yet, no response has been received.

Mr. Jones has since filed a Statement of Organization amendment, changing the name of the Committee to "The Simon Committee." He also filed the July 15 and the October 15, 1980 Quarterly Reports. These reports, along with the April 15, 1980 Quarterly Report filed by Mr. Jones, disclose a total of \$9,887.00 in contributions from Mrs. Pendleton for 1980. There is no mention of the \$3,500 loan.

2 U.S.C. § 441a(a)(1)(C) prohibits any person from making contributions to any other political committee (i.e. not an authorized candidate committee or a committee maintained and established by a national political party) in any calendar year which, in the aggregate, exceed \$5,000. Section 441a(f) prohibits the acceptance of such excessive contributions. Pursuant to section 431(8)(A)(i) (formerly section 431(e)(1)), the term "contribution" includes a loan. Pursuant to 11 C.F.R. § 100.7(a)(1)(i)(B):

A loan is a contribution at the time it is made and is a contribution to the extent that it remains unpaid. The aggregate amount loaned to a ... committee by a contributor when added to other contributions from that individual to that ... committee, shall not exceed the contribution limitations set forth at 11 C.F.R. Part 110.

From the reports filed by the Committee, it appears Mrs. Pendleton exceeded her limit in 1979 by \$4,951.50 and in 1980 by \$4,887.00. Thus, the General Counsel recommends that the Commission find reason to believe the Committee violated 2 U.S.C. § 441a(f) by accepting excessive contributions.

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- 4 -

2 U.S.C. § 434(a)(4)(A)(i) requires all political committees other than authorized committees of a candidate to file quarterly reports in an election year. As the Committee has not filed a Year End Report for 1980 and has not terminated its reporting obligations, the General Counsel recommends that the Commission find reason to believe the Committee violated 2 U.S.C. § 434(a)(4)(A)(i).

11 C.F.R. § 104.11 requires all outstanding debts and obligations owed by a political committee to be continuously reported until extinguished. As there is no evidence that the \$3,500 loan to Mrs. Pendleton has been repaid, the General Counsel recommends that the Commission find reason to believe the Committee violated 11 C.F.R. § 104.11 for failing to continuously report this debt.

11 C.F.R. § 104.12 (formerly section 104.10) requires all political committees which have cash on hand at the time of registration to disclose the source of such funds. As the Committee never reported the source of its beginning balance of \$300, it has not complied with this requirement. Accordingly, the General Counsel recommends that the Commission find reason to believe the Committee violated 11 C.F.R. § 104.12.

Recommendations

1. Find reason to believe that The Simon Committee violated 2 U.S.C. § 441a(f).
2. Find reason to believe that The Simon Committee violated 2 U.S.C. § 434(a)(4)(A).
3. Find reason to believe that The Simon Committee violated 11 C.F.R. § 104.11.
4. Find reason to believe that The Simon Committee violated 11 C.F.R. § 104.12.

82040344697



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Gabriele Pitcairn Pendleton  
Jenkintown Plaza  
6th Floor  
Jenkintown, Pennsylvania 19046

Re: MUR 1378

Dear Mrs. Pendleton:

On , 1981, the Federal Election Commission determined that there is reason to believe that you violated 2 U.S.C. § 441a(a)(1)(C), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") by contributing in excess of \$5,000 to The Simon Committee in both 1979 and 1980. The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Where appropriate, statements should be submitted under oath.

In the absence of any additional information which demonstrates that no further action should be taken against you, the Commission may find probable cause to believe that a violation has occurred and proceed with formal conciliation. Of course, this does not preclude the settlement of this matter through informal conciliation prior to a finding of probable cause to believe if you so desire.

The investigation now being conducted will be confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

62040344698

Letter to Gabriele Pitcairn Pendleton  
Page 2

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Marybeth Tarrant, the staff member assigned to this matter, at 202/523-4175.

Sincerely,

Enclosures

General Counsel's Factual and Legal Analysis  
Procedures

62040314699



FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE \_\_\_\_\_

MUR NO. 1378  
STAFF MEMBER(S) & TEL. NO.  
Marybeth Tarrant

RESPONDENT Gabriele Pitcairn Pendleton

(202) 523-4175

SOURCE OF MUR: INTERNALLY GENERATED

SUMMARY OF ALLEGATIONS

This matter was referred to the Office of General Counsel by the Reports Analysis Division and involves a possible violation of 2 U.S.C. § 441a(a)(1)(C) by Mrs. Pendleton.

FACTUAL BASIS AND LEGAL ANALYSIS

On April 8, 1979, Gabriele Pitcairn Pendleton filed an Independent Expenditure Report (Form 5) reporting \$600 in contributions and \$300 in expenditures on behalf of William E. Simon. On July 6, 1979, Mrs. Pendleton filed another Form 5, this time reporting \$1,200 in contributions to the Independent Campaign to Elect William E. Simon President (the Committee). On that same day, the Committee registered and filed a July 10 Quarterly Report with the Commission. The Committee's chairman was Mrs. Pendleton and the treasurer was C.C. Clinkscales, III. In reply to a letter from the Commission regarding the Committee, RAD received a disavowal letter from Mr. Simon on August 10, 1979.

The Committee's first report disclosed a beginning cash on hand of \$300 and contributions totalling \$1,200 from

02040344700

Mrs. Pendleton although her aggregate total read \$1,800. <sup>1/</sup> The next report filed, the October 10, 1979 Quarterly Report, disclosed another \$1,607.50 in contributions from Mrs. Pendleton in addition to a \$3,500 loan from her to the Committee. This loan was not reflected in Mrs. Pendleton's aggregate contribution total as reported by the Committee. The Year End Report revealed another \$2,044 in contributions from Mrs. Pendleton and the \$3,500 loan as still outstanding. Thus, it appeared Mrs. Pendleton's contribution total to the Committee for 1979 was \$8,951.50.

Prior to the Commission's receipt of the Year End Report, Mr. G. Morgan Jones, III, the National Campaign Director, filed a Statement of Organization amendment which changed the name of the Committee slightly and also changed the mailing address from Washington, D.C. to Bryn Athyn, Pa.

On February 15, 1980, a Request for Additional Information (RFAI) was sent to Mr. Clinkscales advising him of a possible violation of 2 U.S.C. § 441a by Mrs. Pendleton. RAD also requested clarification of certain discrepancies in the reports and asked the Committee to disclose the source of its cash on hand.

On March 6, 1980, Mr. Jones called RAD to say that Mr. Clinkscales, who was no longer treasurer, would not release the records of the Committee and, therefore, it was impossible to answer the RFAI. It was suggested to Mr. Jones that he write a letter to the Commission explaining the circumstances and that he should obtain copies of the back reports in order to comply with the RFAI.

On March 10, 1980, a second letter went out to the Committee, this time addressed to Mr. Jones, regarding the Committee's lack of response and informing Mr. Jones of possible legal action. While Mr. Jones did subsequently file a Statement of Organization amendment naming him the treasurer, no response was made to the RFAI.

On April 12, 1980, an April 15, 1980 Quarterly Report was filed by Mr. Jones. This report covered the period from 12/11/79 to 3/31/80 and disclosed more contributions from Mrs. Pendleton, including one for \$1,000 which was made on 12/13/79, thus bringing her total for 1979 to \$9,951.50.

---

<sup>1/</sup> It thus appears that the \$600 in contributions reported by Mrs. Pendleton on her filing in April were contributions to the Committee and, therefore, she is the source of the \$300 cash on hand. Apparently, \$300 was spent out of the \$600 originally contributed.

02040344701

The report made no mention of the \$3,500 loan from Mrs. Pendleton but rather reported outstanding debts of \$824.34 in addition to \$388.81 as cash on hand at the end of the reporting period.

Shortly after this filing, Mr. Clinkscales filed an April 15, 1980 Quarterly Termination Report which reported a \$1.00 cash on hand and an outstanding debt of \$3,500 owed to Mrs. Pendleton. This was the last report filed by Mr. Clinkscales.

On April 23, 1980, a RAD analyst called Mr. Jones who stated that Mr. Clinkscales would still not hand over the records. Mr. Jones was told that an attempt should be made to refund the excessive amount to Mrs. Pendleton. It was further suggested that an explanatory letter be sent to the Commission. As yet, no response has been received.

Mr. Jones has since filed a Statement of Organization amendment, changing the name of the Committee to "The Simon Committee." He also filed the July 15 and the October 15, 1980 Quarterly Reports. These reports, along with the April 15, 1980 Quarterly Report filed by Mr. Jones, disclose a total of \$9,887.00 in contributions from Mrs. Pendleton for 1980. There is no mention of the \$3,500 loan.

2 U.S.C. § 441a(a) (1) (C) prohibits any person from making contributions to any other political committee (i.e. not an authorized candidate committee or a committee maintained and established by a national political party) in any calendar year which, in the aggregate, exceed \$5,000. Pursuant to section 431(8) (A) (i) (formerly section 431(e) (1)), the term "contribution" includes a loan. Pursuant to 11 C.F.R. § 100.7(a) (1) (i) (B):

A loan is a contribution at the time it is made and is a contribution to the extent that it remains unpaid. The aggregate amount loaned to a ... committee by a contributor when added to other contributions from that individual to that ... committee, shall not exceed the contribution limitations set forth at 11 C.F.R. Part 110.

From the reports filed by the Committee, it appears Mrs. Pendleton exceeded her limit in 1979 by \$4,951.50 and in 1980 by \$4,887.00. Therefore, the General Counsel recommends that the Commission find reason to believe that Mrs. Pendleton violated 2 U.S.C. § 441a.

Recommendation

Find reason to believe that Gabriele Pitcairn Pendleton violated 2 U.S.C. § 441a(a) (1) (C).

0204031402





**REPORT OF RECEIPTS AND DISBURSEMENTS**  
For a Political Committee Other Than an Authorized Committee

(Summary Page)

RECEIVED

80 APR 12 P12: 57

1. Name of Committee (in Full)  
**INDEPENDENT COMMITTEE TO ELECT WILLIAM E. SIMON PRESIDENT**

Address (Number and Street)  
**POST OFFICE BOX "S"**

City, State and ZIP Code  
**GRYNNATHYN PENNSYLVANIA, 19009**

Check if address is different than previously reported.

2. FEC Identification Number  
**C99001174**

3.  This committee qualified as a multicandidate committee during this Reporting Period on \_\_\_\_\_ (date)

4. TYPE OF REPORT (check appropriate boxes)

(a)  April 15 Quarterly Report  
 July 15 Quarterly Report  
 October 15 Quarterly Report  
 January 31 Year End Report  
 July 31 Mid Year Report (Non-election Year Only)  
 Monthly Report for \_\_\_\_\_  
 Twelfth day report preceding \_\_\_\_\_ (Type of Election) election on \_\_\_\_\_ in the State of \_\_\_\_\_  
 Thirtieth day report following the General Election on \_\_\_\_\_ in the State of \_\_\_\_\_  
 Termination Report

(b) Is this Report an Amendment?  
 YES  NO

**SUMMARY**

	Column A This Period	Column B Calendar Year-to-Date
5. Covering Period <b>DEC 11, 1979</b> Through <b>MAR 31, 1980</b>		
6. (a) Cash on Hand January 1, 19 <b>80</b>		\$ 0
(b) Cash on Hand at Beginning of Reporting Period	\$ 0	
(c) Total Receipts (from Line 18)	\$ 5143.00	\$ 5143.00
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)	\$ 5143.00	\$ 5143.00
7. Total Disbursements (from Line 28)	\$ 4754.19	\$ 4754.19
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))	\$ 388.81	\$ 388.81
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)	\$ 0	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	\$ 824.34	

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

For further information, contact:

**G. MORGAN JONES III**  
Type or Print Name of Treasurer

**G. Morgan Jones, III**  
SIGNATURE OF TREASURER

Federal Election Commission  
Toll Free 800-424-9530  
Local 202-523-4068

**4.8.80**  
Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

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

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FEC FORM 3X '80

6493074204

**DETAILED SUMMARY PAGE  
of Receipts and Disbursements  
(Page 2, FEC FORM 3X)**

Name of Committee (in Full)  
**INDEPENDENT COMMITTEE TO ELECT  
WILLIAM E. SIMON, PRESIDENT**

Report Covering the Period:

From: To:

**I. RECEIPTS**

**11. CONTRIBUTIONS (other than loans) FROM:**

(a) Individuals/Persons Other Than Political Committees

(Memo Entry Unrestricted \$ \_\_\_\_\_)

(b) Political Party Committees

(c) Other Political Committees

(d) TOTAL CONTRIBUTIONS (other than loans) (add 11a, 11b and 11c)

**12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES**

**13. ALL LOANS RECEIVED**

**14. LOAN REPAYMENTS RECEIVED**

**15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Returns, etc.)**

**16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES  
AND OTHER POLITICAL COMMITTEES**

**17. OTHER RECEIPTS (Dividends, Interest, etc.)**

**18. TOTAL RECEIPTS (Add 11d, 12, 13, 14, 15, 16 and 17)**

**II. DISBURSEMENTS**

**19. OPERATING EXPENDITURES**

**20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES**

**21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND  
OTHER POLITICAL COMMITTEES**

**22. INDEPENDENT EXPENDITURES (Use Schedule E)**

**23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES  
(2 U.S.C. §441e(d)) (Use Schedule F)**

**24. LOAN REPAYMENTS MADE**

**25. LOANS MADE**

**26. REFUNDS OF CONTRIBUTIONS TO:**

(a) Individuals/Persons Other Than Political Committees

(b) Political Party Committees

(c) Other Political Committees

(d) TOTAL CONTRIBUTION REFUNDS (add 26a, 26b and 26c)

**27. OTHER DISBURSEMENTS**

**28. TOTAL DISBURSEMENTS (Add Lines 19, 20, 21, 22, 23, 24, 25, 26d and 27)**

**III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES**

**29. TOTAL CONTRIBUTIONS (other than loans) from Line 11d**

**30. TOTAL CONTRIBUTION REFUNDS from Line 26d**

**31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from Line 29)**

**32. TOTAL OPERATING EXPENDITURES from Line 19**

**33. OFFSETS TO OPERATING EXPENDITURES from Line 15**

**34. NET OPERATING EXPENDITURES (subtract Line 33 from Line 32)**

	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
11. CONTRIBUTIONS (other than loans) FROM:		
(a) Individuals/Persons Other Than Political Committees	5143.00	5143.00
(Memo Entry Unrestricted \$ _____)		
(b) Political Party Committees	0	0
(c) Other Political Committees	0	0
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11a, 11b and 11c)	5143.00	5143.00
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES	0	0
13. ALL LOANS RECEIVED	0	0
14. LOAN REPAYMENTS RECEIVED	0	0
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Returns, etc.)	0	0
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	0	0
17. OTHER RECEIPTS (Dividends, Interest, etc.)	0	0
18. TOTAL RECEIPTS (Add 11d, 12, 13, 14, 15, 16 and 17)	5143.00	5143.00
<b>II. DISBURSEMENTS</b>		
19. OPERATING EXPENDITURES	4754.19	4754.19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES	0	0
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	0	0
22. INDEPENDENT EXPENDITURES (Use Schedule E)	0	0
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. §441e(d)) (Use Schedule F)	0	0
24. LOAN REPAYMENTS MADE	0	0
25. LOANS MADE	0	0
26. REFUNDS OF CONTRIBUTIONS TO:		
(a) Individuals/Persons Other Than Political Committees	0	0
(b) Political Party Committees	0	0
(c) Other Political Committees	0	0
(d) TOTAL CONTRIBUTION REFUNDS (add 26a, 26b and 26c)	0	0
27. OTHER DISBURSEMENTS	0	0
28. TOTAL DISBURSEMENTS (Add Lines 19, 20, 21, 22, 23, 24, 25, 26d and 27)	4754.19	4754.19
<b>III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES</b>		
29. TOTAL CONTRIBUTIONS (other than loans) from Line 11d	5143.00	5143.00
30. TOTAL CONTRIBUTION REFUNDS from Line 26d	0	0
31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from Line 29)	5143.00	5143.00
32. TOTAL OPERATING EXPENDITURES from Line 19	4754.19	4754.19
33. OFFSETS TO OPERATING EXPENDITURES from Line 15	0	0
34. NET OPERATING EXPENDITURES (subtract Line 33 from Line 32)	4754.19	4754.19

03 20 00 43 01 30 47 42 72 01 35



SCHEDULE A

ITEMIZED RECEIPTS

Page 1 of 3 cc  
 Line Number  
 (Use separate schedules for each category of the Detailed Summary Page)

Any information copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)  
**INDEPENDENT COMMITTEE TO ELECT WILLIAM E. SIMON (RESIDENT)**

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
<b>GABRIELE P. TENDLETON</b> 6th FLOOR JENKINTOWN PLAZA JENKINTOWN, PENNSYLVANIA, 19046	<b>NONE</b>	<b>12-13-79</b>	<b>1000.00</b>
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation <b>HOUSEWIFE</b>	Aggregate Year-to-Date-\$ <b>1000.00</b>	
<b>JERRY D. EASTMAN</b> Box 533 HAMFSTEAD N.H. 03841	<b>EASTMAN AIRLINES</b>	<b>12/13/79</b>	<b>25.00</b>
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation <b>PILOT</b>	Aggregate Year-to-Date-\$ <b>25.00</b>	
<b>RICHARD CHBELL</b> RFD #1 BOX 136 CENTER HARBOR N.H. 03226	<b>RETIRED.</b>	<b>12/13/79</b>	<b>25.00</b>
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation <b>RETIRED</b>	Aggregate Year-to-Date-\$ <b>25.00</b>	
<b>JOHN K. SKELTON</b> P.O. BOX 934 WOLFE BORO N.H. 03894	<b>N/A</b>	<b>12/13/79</b>	<b>25.00</b>
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation <b>N/A</b>	Aggregate Year-to-Date-\$ <b>25.00</b>	
<b>GABRIELE P. TENDLETON</b> 6th FLOOR JENKINTOWN PLAZA JENKINTOWN, PENNSYLVANIA, 19046	<b>NONE</b>	<b>1-23-80</b>	<b>300.00</b>
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation <b>HOUSEWIFE</b>	Aggregate Year-to-Date-\$ <b>1300.00</b>	
<b>CATHLEEN BURNS ELMER</b> RFD CAMPTON THORNTON N.H. 03223	<b>UNKNOWN</b>	<b>1-23-80</b>	<b>25.00</b>
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation <b>UNKNOWN</b>	Aggregate Year-to-Date-\$ <b>25.00</b>	
<b>ROBERT W. THURSTON</b> NEW LONDON N.H. 03257	<b>UNKNOWN</b>	<b>1-23-80</b>	<b>3.00</b>
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation <b>UNKNOWN</b>	Aggregate Year-to-Date-\$ <b>3.00</b>	
SUBTOTAL of Receipts This Page (optional) .....			<b>1403.00</b>
TOTAL This Period (last page this line number only) .....			

0620004301304742720166

SCHEDULE A

ITEMIZED RECEIPTS

Page 2 of 3  
 LONG NUMBER  
 (Use additional sheets for each category of the Detailed Summary Page)

Any information copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full): **INDEPENDENT COMMITTEE TO ELECT WILLIAM E SIMEN, PRESIDENT**

A. Full Name, Mailing Address and ZIP Code <b>MICHAEL F. KENNEDY</b> <b>1105 S PAUL STREET</b> <b>MILWAUKEE, WI, 53203</b>	Name of Employer <b>TEMPLE UNIVERSITY</b>	Date (month, day, year) <b>1-23-50</b>	Amount of Each Receipt This Period <b>25.00</b>
	Occupation <b>SECRETARY</b>	Aggregate Year-to-Date-\$	
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			

B. Full Name, Mailing Address and ZIP Code <b>FRANK A. MCMISON</b> <b>RD. 1</b> <b>NEW MARKET NH 03857</b>	Name of Employer <b>UNKNOWN</b>	Date (month, day, year) <b>1-23-50</b>	Amount of Each Receipt This Period <b>10.00</b>
	Occupation <b>UNKNOWN</b>	Aggregate Year-to-Date-\$ <b>10.00</b>	
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			

C. Full Name, Mailing Address and ZIP Code <b>JOSEPH A. GALLAGHER</b> <b>VALLEY ASSOCIATES PUBLIC AFFAIRS COMMITTEE</b> <b>JENKINTOWN PA 19046</b>	Name of Employer <b>I.T. BANK</b>	Date (month, day, year) <b>1-23-50</b>	Amount of Each Receipt This Period <b>250.00</b>
	Occupation <b>BANKER</b>	Aggregate Year-to-Date-\$ <b>250.00</b>	
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			

D. Full Name, Mailing Address and ZIP Code <b>GABRIELE P. VENOLETON</b> <b>314 FLOOR JENKINTOWN PLAZA</b> <b>JENKINTOWN, PA. 19046</b>	Name of Employer <b>NONE</b>	Date (month, day, year) <b>2-12-50</b>	Amount of Each Receipt This Period <b>300.00</b>
	Occupation <b>HOUSEWIFE</b>	Aggregate Year-to-Date-\$ <b>1600.00</b>	
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			

E. Full Name, Mailing Address and ZIP Code <b>GERALD A. DINALLI</b> <b>160 OVERLOOK AVENUE</b> <b>HACKENSACK, N.J. 07601</b>	Name of Employer <b>UNKNOWN</b>	Date (month, day, year) <b>2-25-50</b>	Amount of Each Receipt This Period <b>5.00</b>
	Occupation <b>UNKNOWN</b>	Aggregate Year-to-Date-\$ <b>5.00</b>	
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			

F. Full Name, Mailing Address and ZIP Code <b>CHARLES J. HENDERSON</b> <b>50 DELAWARE MANAGEMENT CO.</b> <b>NO. 7. IENN CENTER PLAZA</b> <b>PHILADELPHIA, PA, 19103</b>	Name of Employer <b>DELAWARE MANAGEMENT CO.</b>	Date (month, day, year) <b>2-25-50</b>	Amount of Each Receipt This Period <b>50.00</b>
	Occupation <b>INV. MGMT.</b>	Aggregate Year-to-Date-\$ <b>50.00</b>	
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			

G. Full Name, Mailing Address and ZIP Code <b>GABRIELE P. VENOLETON</b> <b>414 FLOOR JENKINTOWN PLAZA</b> <b>JENKINTOWN PA 19046</b>	Name of Employer <b>NONE</b>	Date (month, day, year) <b>2-25-50</b>	Amount of Each Receipt This Period <b>2000.00</b>
	Occupation <b>HOUSEWIFE</b>	Aggregate Year-to-Date-\$ <b>3600.00</b>	
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			

SUBTOTAL of Receipts This Page (optional) ..... **2540.00**

TOTAL This Period (last page this line number only) .....

030333077



SCHEDULE A

ITEMIZED RECEIPTS

Use this page to report for each category of the Detailed Summary Page

Any information copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full) *COMMITTEE TO ELECT ...*

A. Full Name, Mailing Address and ZIP Code <i>...</i>	Name of Employer <i>...</i>	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation		
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$		

B. Full Name, Mailing Address and ZIP Code <i>...</i>	Name of Employer <i>...</i>	Date (month, day, year) <i>3.6...</i>	Amount of Each Receipt This Period
	Occupation		
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$		

C. Full Name, Mailing Address and ZIP Code <i>GABRIELE P. ...</i>	Name of Employer <i>...</i>	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation		
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$		

D. Full Name, Mailing Address and ZIP Code <i>...</i>	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$		

E. Full Name, Mailing Address and ZIP Code <i>...</i>	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$		

F. Full Name, Mailing Address and ZIP Code <i>...</i>	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$		

G. Full Name, Mailing Address and ZIP Code <i>...</i>	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$		

SUBTOTAL of Receipts This Page (optional) ..... *1100.00*

TOTAL This Period (last page this line number only) .....

02093B47208



SCHEDULE B

ITEMIZED DISBURSEMENTS

Any information copied from such returns and statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)  
 INDEPENDENT COMMITTEE FOR THE CONSTITUTION

0 12 00 04 30 13 01 74 27 20 19 9

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
CAR STEEL 15 BROADWAY ST NEW YORK 14 3000	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	12-11-77	11.25
RICHARD T. MAN 1000 12th St WASHINGTON DC 20001	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	12-12-77	15.00
JOHN ENGLAND TELETYPE 1000 12th St WASHINGTON DC 20001	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	12-12-77	225.00
FRANK C. HIGGINS 1000 12th St WASHINGTON DC 20001	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	12-12-77	22.00
G. MORGAN JOHNS 1000 12th St WASHINGTON DC 20001	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		50.00
JOHN ENGLAND TELETYPE 1000 12th St WASHINGTON DC 20001	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	1-15-78	11.75
JOHN ENGLAND TELETYPE 1000 12th St WASHINGTON DC 20001	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	1-22-78	12.45
JOHN ENGLAND TELETYPE 1000 12th St WASHINGTON DC 20001	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	1-23-78	22.00
G. MORGAN JOHNS 1000 12th St WASHINGTON DC 20001	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	1-25-78	11.00

SUBTOTAL of Disbursements This Page (optional) ..... 111

TOTAL This Period (last page this line number only) .....

SCHEDULE B

ITEMIZED DISBURSEMENTS

Page 2 of 4 pages  
 LINE NUMBER  
 (Use column schedules for each category of the Detailed Summary Page)

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)  
 INDEPENDENT ...

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
215 ...	FRAN...		
Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
B. Full Name, Mailing Address and ZIP Code BOX 250 PENNSIC HOLEN, H. 19129	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		1-21-80	72.71
C. Full Name, Mailing Address and ZIP Code BOX 280 ... PA 19021	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		1-15-80	341.73
D. Full Name, Mailing Address and ZIP Code ... ST...	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		2-...	
E. Full Name, Mailing Address and ZIP Code GETTY DIRECT MAIL 2544 HUNTINGDON PIKE HUNTINGDON VALLEY PA, 17136	Purpose of Disbursement TYPING SERVICE	Date (month, day, year)	Amount of Each Disbursement This Period
Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		2-15-80	15.50
F. Full Name, Mailing Address and ZIP Code DIARRD PRINTING BOX 173 SOUTHAMPTON PA, 17966	Purpose of Disbursement PRINTING SERVICE	Date (month, day, year)	Amount of Each Disbursement This Period
Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		2-14-80	40.81
G. Full Name, Mailing Address and ZIP Code MORGAN PRINTING CO 10 E YORK ST LITZBORO PA 19040	Purpose of Disbursement PRINTING SERVICE	Date (month, day, year)	Amount of Each Disbursement This Period
Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		2-17-80	135.68
H. Full Name, Mailing Address and ZIP Code POSTMASTER ... ATHYN PA, 19001	Purpose of Disbursement POSTAGE	Date (month, day, year)	Amount of Each Disbursement This Period
Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		2-20-80	300.00
I. Full Name, Mailing Address and ZIP Code POSTMASTER ... ATHYN PA, 19001	Purpose of Disbursement POSTAGE	Date (month, day, year)	Amount of Each Disbursement This Period
Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		2-21-80	152.27
SUBTOTAL of Disbursements This Page (optional) .....			777.53
TOTAL This Period (last page this line number only) .....			

8620004301 304742721200



SCHEDULE B

ITEMIZED DISBURSEMENTS

Page 3 of 4  
 LINE NUMBER 7  
 (Use separate schedule for each category of the Disbursed Summary Page)

Any information copied from such returns and statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.			
Name of Committee (in Full)			
INDEPENDENT COMMUNITY TO SERVE THE PEOPLE			
A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
OILARD PRINTING CO BOX 180 COUTHAMPTON PA 17024	PRINTING EXP	2-21-73	127.00
Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
S. MORGAN JONES 761 PETERS HILL RD MUNTINGTON VALLEY PA 17053	TRAVEL EXPENSE	2-22-73	200.00
Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
MRS F.A. RICHARDSON 22 WARREN STREET CONCORD N.H. 03301	ROOM RENTAL	2-25-73	25.00
Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
S. MORGAN JONES 761 PETERS HILL RD MUNTINGTON VALLEY PA 17053	TRAVEL EXPENSE	2-26-73	100.00
Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
RADIO SHACK N. MAIN STREET CONCORD N.H. 03301	RECORDING TAPES	2-27-73	122.13
Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
KNOLL CREST GARAGE CONCORD N.H. 03301	FLOWER	2-28-73	175.00
Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
POSTMASTER BRYN ATHYN, PA 19001	POSTAGE	2-29-73	24.03
Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
OILARD PRINTING CO BOX 180 COUTHAMPTON PA 17024	SUPPLIES EXPENSE	2-29-73	53.35
Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
S. MORGAN JONES 761 PETERS HILL RD MUNTINGTON VALLEY PA 17053	TRAVEL EXPENSE	2-29-73	100.00
Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
SUBTOTAL of Disbursements This Page (optional)			114.71
TOTAL This Period (last page this line number only)			

0320094301304742721211



SCHEDULE B

ITEMIZED DISBURSEMENTS

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)  
**INDEPENDENT COMMITTEE FOR THE STATE OF TEXAS**

0809347222

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
S. MORGAN 10115 E. ROSS RD 1761 LETTERS DRIVE RD HOUSTON TEXAS 77058	TRAVEL EXPENSE	2-7-73	500.00
M. G. SMITH JR 115 S. WALKER ST HOUSTON TEXAS 77002	TRAVEL		
J. M. SMITH 5111 W. HIGHTWAY 35 S. WALKER ST HOUSTON TEXAS 77002	TRAVEL	3-25-73	15.51
J. M. SMITH JR 618 280 HOUSTON TEXAS 77002	TRAVEL		117.51
M. G. SMITH JR 115 S. WALKER ST HOUSTON TEXAS 77002	TRAVEL		
<del>Full Name, Mailing Address and ZIP Code</del>	<del>Purpose of Disbursement</del>	<del>Date (month, day, year)</del>	<del>Amount of Each Disbursement This Period</del>
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			1175.21
TOTAL This Period (last page this line number only)			11754.19

SECURED  
(Form 200)

DEBTS AND OBLIGATIONS  
Including Loans

Use of this form is optional  
for each reporting period

6620004301 304742721233

Name of Creditor (or Full Name, Mailing Address and Zip Code of Debtor or Creditor)	Outstanding Balance Beginning This Period	Amount Received This Period	Payments This Period	Outstanding Balance at Close of This Period
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor NEW ENGLAND MANCHESTER NH		45.54		45.54
Nature of Debt (Purpose):				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor MANCHESTER NH		112.71		
Nature of Debt (Purpose):				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor RECORD MONITOR R.N. STATE STREET MANCHESTER NH	6.16			6.16
Nature of Debt (Purpose):				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor MONITOR PUBLISHING CO 10 STATE STREET MANCHESTER NH	1.00			1.00
Nature of Debt (Purpose):				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor BEAUFORT PUBLISHING CO 1750 WALL STREET WEST LYNDHURST N.J.	19.78			19.78
Nature of Debt (Purpose):				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor MANCHESTER NH	528.40			528.40
Nature of Debt (Purpose):				
1) SUBTOTALS This Period This Page (optional)				
2) TOTAL This Period (last page this line only)				
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only)				
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)				





REPORT OF RECEIPTS AND DISBURSEMENTS  
For a Political Committee Other Than an Authorized Committee

APR 18 12 46

(Summary Page)

1. Name of Committee (in Full)

Independent Campaign to Elect William E. Simon President

Address (Number and Street)

P. O. Box 28290

City, State and ZIP Code

Washington, D.C. 20005

Check if address is different than previously reported.

2. FEC Identification Number

099001174

3.  This committee qualified as a multicandidate committee during this Reporting Period on \_\_\_\_\_ (date)

4. TYPE OF REPORT (check appropriate boxes)

April 15 Quarterly Report

July 15 Quarterly Report

October 15 Quarterly Report

January 31 Year End Report

July 31 Mid Year Report (Non-election Year Only)

Monthly Report for \_\_\_\_\_

Twelfth day report preceding \_\_\_\_\_ (Type of Election)

election on \_\_\_\_\_ in the State of \_\_\_\_\_

Thirtieth day report following the General Election

on \_\_\_\_\_ in the State of \_\_\_\_\_

Termination Report

(b) Is this Report an Amendment?  
 YES  NO

3-T-61  
FEC = Q

SUMMARY

5. Covering Period 1 January 80 Through 31 March 80

6. (a) Cash on Hand January 1, 1980 .....

(b) Cash on Hand at Beginning of Reporting Period .....

(c) Total Receipts (from Line 18) .....

(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B) .....

7. Total Disbursements (from Line 28) .....

8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d)) .....

9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D) .....

10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D) .....

	Column A This Period	Column B Calendar Year-to-Date
6. (a) Cash on Hand January 1, 19 <u>80</u> .....		\$ 9.53
(b) Cash on Hand at Beginning of Reporting Period .....	\$ 9.53	
(c) Total Receipts (from Line 18) .....	\$ 123.63	\$ 123.63
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B) .....	\$ 133.16	\$ 133.16
7. Total Disbursements (from Line 28) .....	\$ 132.16	\$ 132.16
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d)) .....	\$ 1.00	\$ 1.00
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D) .....	\$ .00	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D) .....	\$ 3,500.00	

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

For further information, contact:

Federal Election Commission  
Toll Free 800-424-9530  
Local 202-623-4068

C. C. Clinkscales, III

Type or Print Name of Treasurer

*C. C. Clinkscales, III*  
SIGNATURE OF TREASURER

April 15, 1980

Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. § 437g.

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

FEC FORM 3X-3 301

9 0 0 3 0 0 7 4 5 9 3



SCHEDULE A

ITEMIZED RECEIPTS

Form 1040-SS  
 Use separate statement for each category of the Detailed Summary Page

Any information stated from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committees.

Name of Committee (in Full)  
 Independent Campaign to Elect William E. Simon President

302036874579

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
None	Occupation		.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$		
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		
Aggregate Year-to-Date-\$			
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		
Aggregate Year-to-Date-\$			
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		
Aggregate Year-to-Date-\$			
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		
Aggregate Year-to-Date-\$			
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		
Aggregate Year-to-Date-\$			
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		
Aggregate Year-to-Date-\$			

SUBTOTAL of Receipts This Page (optional) ..... 1.00

TOTAL This Period (last page this line number only) ..... .00



SCHEDULE B

ITEMIZED DISBURSEMENTS

Any information shown from such returns and statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)

Independent Campaign to Elect William E. Simon President

8 2 0 0 3 0 7 5 1 9 8

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
M.C.B. Corp. 1150 17th Street, NW Washington, DC 20036	Phone Charges Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	1-14-80	9.02
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
CLCo, Inc. 1941 N. Woodley St. Arlington, VA 22207	Prepare FEC Report Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	3-14-80	\$122.63
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
National Savings & Trust Company 155 F New York Avenue, NW Washington, D.C. 20005	Bank Charge Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	2-6-80	\$.51 (approx.)
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
SUBTOTAL of Disbursements This Page (optional)			\$ 132.16
TOTAL This Period (last page this line number only)			\$ 132.16

LOANS

Name of Company (if Full)			
A. Full Name, Mailing Address and ZIP Code of Loan Source Mrs. Gabriela Pitarino Pontelton Box 285 Bryn Athyn, PA 19005 Election: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Original Amount of Loan \$3,500.00	Cumulative Payment To Date .00	Balance Outstanding at Close of This Period \$3,500.00
Terms: Date Incurred _____ Date Due _____ Interest Rate _____ % (apr) <input type="checkbox"/> Secured			
List All Endorsers or Guarantors (if any) to Item A			
1. Full Name, Mailing Address and ZIP Code  <i>None</i>	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding: \$		
2. Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding: \$		
3. Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding: \$		
B. Full Name, Mailing Address and ZIP Code of Loan Source			
Election: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Terms: Date Incurred _____ Date Due _____ Interest Rate _____ % (apr) <input type="checkbox"/> Secured			
List All Endorsers or Guarantors (if any) to Item B			
1. Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding: \$		
2. Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding: \$		
3. Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding: \$		
SUBTOTALS This Period This Page (optional) .....			
TOTALS This Period (last page in this line only) .....			
Carry outstanding balance only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.			

96 Q2 00 34 '0 03 74 34 57 91 79

**DEBTS AND OBLIGATIONS**  
 Including Leases



Name of Committee or Full Independent Campaign to Elect William E. Simon, President	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payments This Period	Outstanding Balance as Close of This Period
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor  <u>None</u>				
Nature of Debt (Purpose):				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
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) . . . . .				
2) TOTAL This Period (last page this line only) . . . . .				
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only) . . . . .				
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only) . . . . .				

92034b37434528



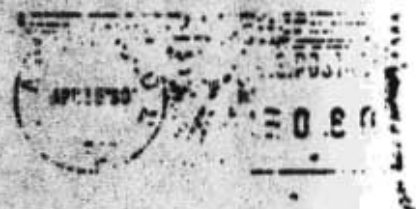


endent Campaign To Elect  
an E. Simon President  
Box 28290  
ngton, D.C. 20005

0 3 4 4 7 2 2  
0 2 0

**CERTIFIED**  
P14 7912473  
**MAIL**

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



APR 18 PM 12:46

TELECON

ANALYST Mike Thompson  
initiated call? yes

TELECON WITH: Mr. G. Morgan Jones, Treasurer  
initiated call?                     

(215) 947-2234

Candidate/Committee: Independent Committee to Elect William E. Simon President  
(C99001174)

DATE: 4/23/80

SUBJECT(s): Possible excessive contributions; filing of TWO April 15 reports;  
one by old treasurer and one by current treasurer

I called Mr. Jones to see if he had requested copies of all previous reports filed by the committee from the Commission. He said no, that he had decided to try to obtain them and the records of the committee from Mr. Clinkscales, the former treasurer, (who had refused to release them).

Mr. Jones was in Washington last week and visited the offices of Mr. Clinkscales but he was not in.

I told Mr. Jones that the matter of possible excessive contributions was a rather serious matter and that it would be best to make an attempt to correct the situation, (although I agreed that without the records this may be difficult). I agreed to send Mr. Jones copies of the reports previously submitted by the committee including the most recent report.

Mr. Clinkscales has filed an April 15 Termination Report with the Commission covering the period from 1/1/80 through 3/31/80. Mr. Jones has filed an April 15 Report covering the period from 12/11/79 through 3/31/80. The reports are widely different as would be expected. However, there are contributions from Ms. Gabrielle Pitcairne which are further in excess of the limits during 1979 on Mr. Jones' report which were not reported on the original Year-End Report filed by Mr. Clinkscales.

I explained that the more important problem at this point is the excessive contributions. I suggested that the loan repayment plus any amount of contribution refund which would reduce the amount of the contribution to \$5,000 would be the best way to handle the situation. He will try to do what he can considering the circumstances.

I also requested that he send a letter to the Commission explaining that he is working on the problem and that a response will be submitted as soon as he can determine what the proper course of action would be.

02040344723



REPORTS ANALYSIS REFERRAL SHEET

DATE April 24, 1980 ANALYST Mike Thompson
TO: TEAM CHIEF Irene Allen
THROUGH: STAFF DIRECTOR COMPLIANCE REVIEW CB
FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS

CANDIDATE/COMMITTEE: Independent Committee to Elect William E. Simon President
TREASURER: Mr. G. Morgan Jones, National Campaign Director
ADDRESS: P.O. Box "S" Bryn Athyn, Pennsylvania 19009

AFFILIATE(S):

ALLEGATION(S): CITE: ATTACHMENT(S)
Acceptance of excessive Contributions 2 U.S.C. 441a 2
Failure to disclose source of Cash on Hand 11 C.F.R. 104.10

DATE INITIATED: 4-15-80

MANNER IN WHICH REVIEW WAS INITIATED: ATTACHMENT
Normal Review Other:
Special Project:

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment 1.

PERIOD COVERED FROM April 1, 1979 TO December 31, 1979

TOTAL RECEIPTS \$ 27,620 TOTAL EXPENDITURES \$ 27,610

CASH ON HAND \$ 9 DEBTS \$ 3,500

HISTORY:

RESULTS OF REVIEW: ATTACHMENT
RFAI/SV for July 10, October 10 and Year-End Reports, 1979 2
Second Notice RFAI/SV for the above reports 4

COMMUNICATIONS WITH CANDIDATE/COMMITTEE: ATTACHMENT
Telecon with Mr. G. Morgan Jones regarding RFAI/SV 3

REASON(S) FOR REFERRAL: ATTACHMENT
Excessive Contributions not returned; failure to disclose source of COH
(No response to RFAI/SV)

OTHER PENDING ACTIONS INITIATED BY RAD: ATTACHMENT

OTHER RELEVANT INFORMATION: ATTACHMENT
See Reports of Independent Expenditures submitted by Mrs. Gabrielle Pendleton,
(Former?) Campaign Chairman 5 & 6
This is an unauthorized DRAFT committee. See Statement of Organization for
the committee and Disavowal Notice submitted by Mr. Simon 7 & 8

PREVIOUS OGC/AUDIT REFERRALS FROM RAD:

INDEPENDENT EXPENDITORS

COMMITTEE	DOCUMENT	RECEIPTS		EXPENDITURES		COVERAGE DATES	# OF PAGES	ID NUMBER
		PRIMARY	GENERAL	PRIMARY	GENERAL			
INDEPENDENT COMMITTEE TO ELECT WILLIAM E SINON PRESIDENT								
1979	STATEMENT OF ORGANIZATION					4JUL79	4	79FEC/100/...
	MISCELLANEOUS REPORT					14JUL79 FROM FEC	3	79FEC/100/...
	MISCELLANEOUS REPORT					10AUG79 TO FEC	2	79FEC/100/...
	JULY QUARTERLY	4,191		3,474		1APR79 -30JUN79	4	79FEC/100/...
	REQUEST FOR ADDITIONAL INFORMATION					1APR79 -30JUN79	3	80FEC/100/...
	REQUEST FOR ADDITIONAL INFORMATION 2ND					1APR79 -30JUN79	8	80FEC/100/...
	OCTOBER QUARTERLY	13,706		13,138		1JUL79 -30SEP79	9	79FEC/100/...
	OCTOBER QUARTERLY - AMENDMENT	13,781		13,221		1JUL79 -30SEP79	3	80FEC/100/...
	REQUEST FOR ADDITIONAL INFORMATION					1JUL79 -30SEP79	1	80FEC/100/...
	REQUEST FOR ADDITIONAL INFORMATION 2ND					1JUL79 -30SEP79	1	80FEC/100/...
	YEAR-END	9,047		10,615		1OCT79 -31DEC79	9	80FEC/100/...
	REQUEST FOR ADDITIONAL INFORMATION					1OCT79 -31DEC79	1	80FEC/100/...
	REQUEST FOR ADDITIONAL INFORMATION 2ND					1OCT79 -31DEC79	1	80FEC/100/...
1980	STATEMENT OF ORGANIZATION - AMENDMENT					21JAN80	3	80FEC/100/...
	TOTAL	27,019	0	27,310	0		53	TOTAL PAGES

INDEPENDENT EXPENDITORS

COMMITTEE	DOCUMENT	RECEIPTS		EXPENDITURES		COVERAGE DATES	# OF PAGES	RECORDS LOCATION
		PRIMARY	GENERAL	PRIMARY	GENERAL			
GABRIELE, PITCAIRN PENDLETON								ID 6C90002668
	1979 APRIL QUARTERLY		600			300 1JAN79 -31MAR79	2	79FEC/103/127
	JULY QUARTERLY		1,200			0 1APR79 -30JUN79	3	79FEC/103/127
	TOTAL	0	1,800	0		300	4	TOTAL PAGES





FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

15 February 1980

Mr. C. C. Clinksdales, III, Treasurer  
Independent Committee to Elect William E. Simon President (C99001174)  
P.O. Box "S"  
Bryn Athyn, Pennsylvania 19009

Dear Mr. Clinksdales:

This letter is prompted by the Commission's preliminary review of your July 10, October 10, October 10 Amendment and Year-End, 1979 Reports of Receipts and Expenditures. The review raised questions as to specific contributions and/or expenditures and to the reporting of certain information required by the Federal Election Campaign Act, (the Act). An itemization of these areas follows:

On Schedule A for Lines 14a and 17a, your reports disclose contributions which appear to exceed the limits of 2 U.S.C. 441a. Pertinent portions of your reports are attached so that a review of your records may be made. (Please note also that under 11 C.F.R. 100.4(a)(1)(i), a loan is a contribution to the extent that the obligation remains outstanding). The Act precludes an individual from making contributions to an "other political committee" which, in the aggregate, exceed \$5,000. If you have received contributions which exceed the limits, the Commission recommends that you refund to the donor the amount which is in excess of \$5,000. Refunds should be reported to the Commission immediately by letter and on Schedule B for Line 21a on your next report.

If you find that the contributions in question have been disclosed incompletely or incorrectly, you should amend your original reports with information which would clarify the public record.

Although the Commission may take further legal steps regarding the acceptance of excessive contributions, your prompt refund of the excessive amount to the donor will be taken into consideration by the Commission.

11 C.F.R. 104.10 requires committees that have cash on hand at the time of registration to disclose the source(s) of those funds. Please amend your July 10 Report to provide the source(s) of the \$300 reported on this initial report as beginning cash on hand.

On Schedule C for Line 13 for the October 10 Report, the committee disclosed a loan for \$3,500 from Mrs. Gabriele Pitcairne Pendleton; however, this loan has not been itemized on Schedule A for Line 17a. Please amend your October 10 Report to provide a Schedule A for this loan received.

88 2000 4301 30 45 40 70 2379

Page Two.

Request for Additional Information.

July 10, October 10, October 10 Amendment and Year-End, 1979 Reports.  
Independent Committee to Elect William E. Simon President (C99001174)

On Schedule A for Line 14a for the July 10 Report, (initial report), the committee itemized contributions from Mrs. Gabriele Pitcairne Pendleton totalling \$1,200; however, the aggregate disclosed for this contributor is \$1,800. Please provide the circumstances for this discrepancy and amend your July 10 Report accordingly.

11 C.F.R. 100.4(a)(1)(i) states that a loan is a contribution to the extent that the obligation remains outstanding. Please amend your October 10 and Year-End Reports to include the loan of \$3,500 from Mrs. Gabriele Pitcairne Pendleton in the totals for Aggregate Year-to-Date contributed.

On Schedule E for Line 23 for the July 10 Report, the committee itemized \$1,895.58 as "Independent Expenditures"; however, the total disclosed is \$1,886.58. Please amend your report accordingly.

The committee's October 10 Amendment contained adjustments to itemized expenditures in the amount of \$30 increase and unitemized expenditures in the amount of \$113 increase. Please amend your October 10 Report to provide the circumstances for these adjustments and provide amended Schedule(s) B as appropriate.

On Schedule A for Line 14a for the Year-End Report, the committee itemized \$5,224 in contributions. However, the total disclosed by the committee is \$5,214. On Schedule B for Line 20a for the Year-End Report, the committee itemized \$9,703.18 in expenditures. However, the total disclosed by the committee is \$9,803.18. Please provide the circumstances for these discrepancies and amend your Year-End Report accordingly.

2 U.S.C. 434(b)(9) requires disclosure of the identification of each person to whom an expenditure has been made by or on behalf of the committee which is in excess of \$100, or in an amount less than \$100 if the total exceeds \$100 for the calendar year, together with the amount, date and particulars of each such expenditure. Please provide the person to whom expenditures have been made along with the amount, date and purpose(s) of each such expenditure, if itemizable, for the following reimbursements, (if expenditures made by such persons were not itemizable, please so state):

Richard M. McNeil	\$147.64	"Itemized Expenses"	October 10 Report
W. McMichael Jones	\$176.02	"Itemized Expenses"	Year-End Report

In addition, advances paid to persons are not considered to be expenditures, but rather a part of the committee's cash on hand, until an expenditure "on behalf of the committee" is made. Such expenditures, when made from the advances funds, should be reported on Schedule B in accordance with 2 U.S.C. 434(b)(9). (Please be advised that under 2 U.S.C. 437b(a)(2), no expenditure may be made except by check drawn on one or more of the committee's designated campaign depositories. Further, 2 U.S.C. 432(b) requires that all funds of a political committee shall be segregated from, and not commingled with, any personal funds). Please amend your October 10 and Year-End Reports to provide the proper information for the following advances:

0 8 2 6 4 7 6 3 0 4 0 2 8 9





YEAR-END REPORT

Name of Candidate or Committee in Full  
**Independent Campaign To Elect William E. Simon President**

Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
<b>Gabriela Pizarra Pondleton</b> Box 228, Cairnwood Bryn Mawr, PA 19009	<b>Housewife</b> Occupation <b>Housewife</b>	12/15/79 12/16/79 12/17/79 12/18/79 12/19/79 12/20/79 12/21/79 12/22/79 12/23/79 12/24/79 12/25/79 12/26/79 12/27/79 12/28/79 12/29/79 12/30/79 12/31/79	\$125.00 (Party In-Kind) \$125.00 (Party In-Kind) \$25.00 \$25.00 \$25.00 \$25.00 \$25.00 \$25.00 \$25.00 \$25.00 \$25.00 \$25.00 \$25.00 \$25.00 \$25.00 \$25.00 \$25.00 \$25.00
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$5,441.50		
<b>Walter R O'Connell</b> 460 Park Avenue New York City, NY 10022	<b>Olin Corp. 460 Park Ave, NYC NY 10022</b> Occupation <b>Chairman, Finance Committee</b>	12/22/79	\$1,000.00
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$1,000.00		
<b>Dr. William Seldman</b> 600 Park Avenue New York City, NY 10022	<b>Phelps Dodge Corp.</b> Occupation <b>Consultant</b>	11/19/79	\$1,000.00
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$1,100.00		
<b>Dr. S. Williams</b> 608 Hawthorne Rd. Pittsburgh, PA 15238	<b>PPG Industries</b> Occupation <b>Executive</b>	11/14/79	\$300.00
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$300.00		
<b>Ed Tecker</b> Sparks, NE 69041	<b>Same</b> Occupation <b>FARMERS</b>	4/2/79	\$25.00
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$125.00		
<b>Samuel Tamponi</b> 2 Amburn St. Nashua, NH 02860	<b>Self employed</b> Occupation <b>Industrial Developer</b>	10/13/79	\$150.00
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$150.00		
<b>Lawrence W. Rothman</b> 274 1/2 N. Main St. Concord, NH 03301	<b>Retired</b>	10/15/79 11/8/79	\$200.00 \$100.00
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$300.00		

SUBTOTAL of receipts this page (optional) ..... \$4,809.00  
 TOTAL this period (last page this line number only) ..... \$

OCTOBER 10 REPORT

Name of Candidate or Committee in Full			
Independent Campaign To Elect William E. Simon President			
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Gabriela Pitcairn Pendleton Cairwood, Box 338 Bryn Athyn, PA 19009	home	7/30/79	\$300.00 ✓
	Occupation housewife	8/30/79	300.00 ✓
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed	9/27/79
		Aggregate Year-To-Date ... \$3407.50	9/29/79
Mrs. Habel K. Johnson 3400 Morgan Road Ann Arbor, MI 48104	same	8/14/79	\$500.00 ✓
	Occupation housewife		
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed	
		Aggregate Year-To-Date ... \$ 500.00	
Mr. James A. Morrison 3920 B 70th Avenue Crt. West Tacoma, WA 98466	United Airlines SEA-TAC Airport, Seattle	8/6/79	\$100.00
	Occupation Airline pilot	8/24/79	50.00
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed	
		Aggregate Year-To-Date ... \$ 150.00	
Garth Pitcairn 600 Woodward Drive Huntingdon Valley, PA 19006	Pitcairn Volkswagen, Inc. Route 1 Morrisville, Pa 19067	8/13/79	\$1,000.00 ✓
	Occupation Automobile Dealer		
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed	
		Aggregate Year-To-Date ... \$1,000.00	
Joseph A. Gallagher 1700 Market Street Philadelphia, PA 19103	Industrial Valley Bank Philadelphia, PA	8/27/79	\$200.00 ✓
	Occupation President		
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed	
		Aggregate Year-To-Date ... \$200.00	
Mrs. Hebe Dick Baldwin 225 South 8th Street Philadelphia, PA 19106	home	8/27/79	\$25.00
	Occupation housewife	9/7/79	975.00 ✓
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed	
		Aggregate Year-To-Date ... \$1,000	
Mr. Dan Pitner P. O. Box 113 Tupelo, MS 38801	home	8/30/79	\$250.00 ✓
	Occupation		
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed	
		Aggregate Year-To-Date ... \$ 250.00	
SUBTOTAL of receipts this page (optional) .....			\$ 4,707.50
TOTAL this period (last page this line number only) .....			\$

(c)

OCTOBER 10 1979

620243130449324

National Committee and Campaign in Full				
Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payments To Date	Outstanding Balance at Close of This Period
H. Mrs. Gabrielle Pittsirn Pendleton Box 388, Cairnwood Bryn Mawr, PA 19009 <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	8/28/79	\$3,500.00	\$ .00	\$3,500.00
NATURE OF OBLIGATION (Details of Debt): financial transfer to pay for magazine ads. To be re-paid by campaign				
Full Name, Mailing Address and ZIP Code of Debtor or Creditor <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payments To Date	Outstanding Balance at Close of This Period
NATURE OF OBLIGATION (Details of Debt):				
Full Name, Mailing Address and ZIP Code of Debtor or Creditor <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payments To Date	Outstanding Balance at Close of This Period
NATURE OF OBLIGATION (Details of Debt):				
Full Name, Mailing Address and ZIP Code of Debtor or Creditor <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payments To Date	Outstanding Balance at Close of This Period
NATURE OF OBLIGATION (Details of Debt):				
SUBTOTALS this period this page (optional) .....		\$	\$	\$
TOTAL this period (last page this line number only) .....		\$	\$	\$3,500.00
Carry outstanding balance only to appropriate line of summary.				





TELECON

ANALYST Mike Thompson  
initiated call?                     

TELECON WITH: Mr. Morgan Jones, National Campaign Director  
initiated call? yes

Candidate/Committee: Independent Committee to elect William Simon President

DATE: March 6, 1980

SUBJECT(s): SV for excessive contributions and RFAI for disclosure provisions

---

Mr. Jones called to say that Mr. Clinksdales, the former treasurer, has refused to release the records of the committee for the period during which he was the treasurer. Mr. Jones came to the committee around December, 1979 or January 1980 and was not familiar with the operation of the committee but agreed to take over. The committee has since appointed a new treasurer, (for which I requested an amendment to the committee's Statement of Organization).

I told him that a response was due on the RFAI and SV and that the only thing that I could do was make note of the problems in the committee's file. I suggested that he research what was available and make any necessary refunds as soon as possible.

I suggested that Mr. Jones send a letter to the Commission explaining the circumstances and detailing his efforts in the matter. This would serve to indicate, publicly, that he was not ignoring the issues. He said that he would send a letter today.

He asked for a copy of the Year-End Report. I gave him the phone number for Public Disclosure Division and explained how to get copies of documents.

62040344734

(215) NO LISTING IN  
3RAYO PNYW  
for G. William Jones.



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

10 March 1980

Mr. G. Morgan Jones, III, National Campaign Director  
Independent Committee to Elect William E. Simon President (C99001174)  
P.O. Box "S"  
Bryn Athyn, Pennsylvania 19009

Reference: July 10 Report, 1979 (4/1/79 - 6/30/79)  
October 10 Report, 1979 (7/1/79 - 9/30/79)  
October 10 Amended Report, 1979 (7/1/79 - 9/30/79)  
Year-End Report, 1979 (10/1/79 - 12/31/79)

Dear Mr. Jones:

This letter is to inform you that as of this date, the Commission has not received your response to our request for additional information, dated 15 February 1980. That notice requested information essential to full public disclosure of your Federal election financial activity and to assure compliance with the provisions of the Federal Election Campaign Act, (the Act).

If no response is received within fifteen (15) days of the date of this notice, the Commission may choose to take legal action to insure compliance with the Act.

If you have any questions, contact Mike Thompson on the toll-free number, (800) 424-9530. The local number is (202) 523-4048.

Sincerely,

*Thomas J. Haselhorst*  
Thomas J. Haselhorst  
Assistant Staff Director  
Reports Analysis Division

Attachment: Request for Additional Information  
dated 15 February 1980

8207310600338  
82040344735



OR CONTRIBUTIONS BY PERSONS

9000-668  
APRIL 10 REPORT  
FEDERAL ELECTION COMMISSION

1. (a) Name (in full)  
**Gabriel Pitcairn Pendleton**

2. Identification Number  
NONE

(b) Address (number and street)  
**Cairwood**

3. This is an Independent Expenditure:  
 In support of **William E. Simon**  
 In opposition to Federal candidate.

(c) City, State and ZIP Code  
**Bryn Athyn, PA 19009**

(d) Principal Place of Business  
**home**

(e) Occupation  
**housewife**

4. Type of Report (check appropriate box and complete)

(a)  Amendment for \_\_\_\_\_ (which report) \_\_\_\_\_

(b)  April 10 Quarterly Report

(c)  July 10 Quarterly Report

(d)  October 10 Quarterly Report

(e)  January 31 Year End Report

(f)  Tenth day report preceding \_\_\_\_\_ election on \_\_\_\_\_ in the State of \_\_\_\_\_  
(primary, general or convention) (date)

(g)  Thirtieth day report following \_\_\_\_\_ election on \_\_\_\_\_ in the State of \_\_\_\_\_  
(primary, general or convention) (date)

5. This report covers the period inception through March 31, 1979

Complete either Line 6 or Line 7 whichever is appropriate. **CONTRIBUTIONS**

Full Name, Mailing Address and ZIP Code of Payee	Particular of Expenditure	Date (month, day, year)	Amount	Name and Office Sought of Federal Candidate
Gabriele Pitcairn Pendleton	personal accounts	3/23/79	\$300.00	William E. Simon President of the US
		3/26/79	\$300.00	

Complete either Line 6 or Line 7 whichever is appropriate. **EXPENDITURES**

Full Name, Mailing Address and ZIP Code of Payee	Particular of Expenditure	Date (month, day, year)	Amount	Name and Office Sought of Federal Candidate
CLCo, Inc. 1941 North Woodley Arlington, VA 22207	advertisement	3/26/79	\$300.00	William E. Simon President of the US

8. TOTAL CONTRIBUTIONS ..... \$ 600.00

9. TOTAL EXPENDITURES ..... \$ 300.00

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, concert with, or at the request or suggestions of any candidate or any authorized committee or agent of such candidate or authorized committee. Furthermore, these expenditures did not involve the financing of dissemination, distribution, or republication in whole or in part of any campaign materials prepared by the candidate, his campaign committee, or their agent.

Subscribed and sworn to before me this 6<sup>th</sup> day of APRIL, 1979

My Commission expires: \_\_\_\_\_

*C. C. Clinkscates, III*  
Signature Date April 6, 1979

*Theresa J. Murray*  
My Commission Expires March 31, 1982  
NOTARY PUBLIC

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. Section 437g or Section 441j (See reverse side of form).

For further information Contact: Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463  
800-424-9530

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

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REPORT OF INDEPENDENT EXPENDITURES  
OR CONTRIBUTIONS BY PAYEE

(To be used by an individual or a person other than political committee)

FEDERAL ELECTION COMMISSION  
JUL 6 1979  
P2:03

14051013579  
82040344737

1. (a) Name (in full) <b>Gabriela Pitcairn Pendleton</b>	2. Identification Number <b>None</b>
(b) Address (number and street) <b>Gairwood, Box 338</b>	3. This is an Independent Expenditure: <input checked="" type="checkbox"/> In support of Federal candidate. <input type="checkbox"/> In opposition to Federal candidate.
(c) City, State and ZIP Code <b>Bryn Athyn, PA 19009</b>	
(d) Principal Place of Business <b>home</b>	(e) Occupation <b>Housewife</b>

4. Type of Report (check appropriate box and complete)

(a)  Amendment for \_\_\_\_\_ (which report) (d)  October 10 Quarterly Report  
 (b)  April 10 Quarterly Report (e)  January 31 Year End Report  
 (c)  July 10 Quarterly Report  
 (f)  Tenth day report preceding \_\_\_\_\_ election on \_\_\_\_\_ in the State of \_\_\_\_\_  
 (primary, general or convention) (date)  
 (g)  Thirtieth day report following \_\_\_\_\_ election on \_\_\_\_\_ in the State of \_\_\_\_\_  
 (primary, general or convention) (date)

5. This report covers the period 4/1/79 through 6/30/79

Complete either Line 6 or Line 7 whichever is appropriate. **CONTRIBUTIONS**

Full Name, Mailing Address and ZIP Code of Payee	Particular of Expenditure	Date (month, day, year)	Amount	Name and Office Sought of Federal Candidate
Independent Campaign to Elect William E. Simon President P. O. Box 28260 Washington, D.C. 20005	Contribution	quarter	\$1,200.00	William E. Simon President

Complete either Line 6 or Line 7 whichever is appropriate. **EXPENDITURES**

Full Name, Mailing Address and ZIP Code of Payee	Particular of Expenditure	Date (month, day, year)	Amount	Name and Office Sought of Federal Candidate

8. TOTAL CONTRIBUTIONS ..... \$ 1,200.00

9. TOTAL EXPENDITURES ..... \$ \_\_\_\_\_

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, concert with, or at the request or suggestions of any candidate or any authorized committee or agent of such candidate or authorized committee. Furthermore, these expenditures did not involve the financing of dissemination, distribution, or republication in whole or in part of any campaign materials prepared by the candidate, his campaign committee, or their agent.

*L.P. Pendleton, Jr.* June 29, 1979  
Signature Date

Subscribed and sworn to before me this 24<sup>th</sup> day of June, 1979  
 My Commission expires: Philip A. Guerrero  
 MY COMMISSION EXPIRES: JUNE 15, 1981 NOTARY PUBLIC

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. Section 437g or Section 441j (See reverse side of form).

For further information Contact: Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463  
800-424-9630

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

For a Political Committee

Supporting organizations for federal office and campaigning committees must file this statement in calendar year in support of each candidate.

(See Revised 1976 Form Instructions.)

RECEIVED  
FEDERAL ELECTION  
COMMISSION

Notes: Committees authorized by a candidate to receive contributions and make expenditures in connection with such candidate's campaign must maintain separate records with respect to each election.

1(a) Name of Committee (in full) <input type="checkbox"/> Check if name or address is changed Independent Campaign to Elect William E. Simon President	2 Identification Number None
1(b) Address (number and street) P.O. Box 28290	3 Date June 29, 1979
1(c) City, State and ZIP code Washington, D.C. 20005	4 Is this an amended statement <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "YES" FILL IN ONLY THOSE LINES ON WHICH THERE HAS BEEN A CHANGE

5 Check one:

(a) This committee has been designated as the principal campaign committee for \_\_\_\_\_ (Name of Candidate) a candidate for \_\_\_\_\_ (Federal office sought) in the \_\_\_\_\_ (Year of election) Election to be held in the State of \_\_\_\_\_ (State in which election is held)

(THE PRINCIPAL CAMPAIGN COMMITTEE WILL FORWARD TO THE COMMISSION A COPY OF THE STATEMENT OF ORGANIZATION EACH AFFILIATED COMMITTEE REQUIRED TO FILE WITH IT.)

(b) This committee is supporting only one candidate, and is authorized by \_\_\_\_\_ (Name of Candidate) to receive contributions and make expenditures with respect to the \_\_\_\_\_ (General, Primary, Runoff, etc) Election(s) held in \_\_\_\_\_ (Year of election in State), and will file all reports and statements with the candidate's principal campaign committee, \_\_\_\_\_ (Full name of principal campaign committee)

(ATTACH A COPY OF CANDIDATE'S WRITTEN AUTHORIZATION.) (FEC FORM 2a)

(c) This committee supports only one candidate William E. Simon (Name of Candidate) but is not an authorized committee.

(d) This committee supports more than one Federal candidate and is not a party committee.

(e) This committee is a \_\_\_\_\_ (National, State, county, city) committee of the \_\_\_\_\_ (Democratic, Republican, etc.) Party.

6 Names of affiliated and/or connected organizations	Mailing address and ZIP code	Relationship
None		

If the registering political committee has identified a "connected organization" above, please indicate type of organization:

Corporation       Labor organization       Membership organization       Trade association       Cooperative

Corporation without capital stock       Other (please specify)

Submit additional information on separate continuation sheets appropriately labeled and attached to this Statement of Organization. Indicate in the appropriate section above when information is continued on separate page(s).

62040344738





Name of Committee: Independent Campaign to Elect William E. Simon President JUL 6 PM 12:30

11 List by name, address and position, other principal officers of the committee (include chairman, treasurer, secretary, assistant treasurer, assistant secretary, members of Finance Committee):

Full name	Mailing address and ZIP code	Title or position
Mrs. Gabrielle Friccion Pordlekin	Cairwood, Box 238 Bryn Athyn, PA 19007	Chairman

12 Does this committee plan to stay in existence beyond the current calendar year?  Yes  No  
If "Yes" for how long? 10 months

13 In the event of dissolution, what disposition will be made of residual funds? Returned to contributors or dispersed to another political committee for federal office.

14 List all banks or other repositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds:

Name of bank, repository, etc.	Mailing address and ZIP code
National Savings & Trust (checking account)	15th St. & New York Ave., N.W. Washington, DC 20005

15 List all election reports required to be filed by this committee with States and local jurisdictions, together with the names, addresses, and positions of the recipients of the reports (other than reports filed with Secretaries of State pursuant to USC 430(a)):

Report title	Date required	Name and position of recipient	Mailing address and ZIP code
none			

Submit additional information on separate continuation sheets appropriately labeled and attached to this Statement of Organization. Indicate in the appropriate section above when information is continued on separate page(s).

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

[Signature]  
(Signature of Treasurer)

June 29, 1979  
(Date)

Note: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. §437g or §441j (see Instructions)

For further information contact:

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

820403474013577

WILLIAM E. SIMON  
22<sup>nd</sup> Floor  
1221 AVENUE OF THE AMERICAS  
New York, New York 10020

FEDERAL ELECTION COMMISSION

79 JUL 10 PM 12:18

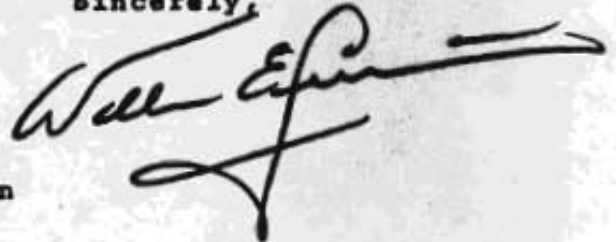
July 30, 1979

Gentlemen:

On July 20, 1979 I received a letter dated July 16 from your Staff Director, Mr. Orlando B. Potter, notifying me that a Statement of Organization was filed with the Federal Election Commission on July 6, 1979, by the "Independent Campaign to Elect William E. Simon President".

Pursuant to Section 100.2(c) of the Commission's regulations, 11 C.F.R. paragraph 100.2(c), I hereby disavow any activity on my behalf by the "Independent Campaign to Elect William E. Simon President".

Sincerely,



Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463  
att: Reports Analysis Division

62040344741

79031020955





FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MEMORANDUM

TO : CHARLES STEELE

THROUGH: B. ALLEN CLUTTER *BA*

FROM : BILL LOUGHREY

SUBJECT: REFERRAL OF THE SIMON COMMITTEE (AKA INDEPENDENT COMMITTEE TO ELECT WILLIAM SIMON PRESIDENT)

DATE : NOVEMBER 28, 1980

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Please consider the attached as an update to the referral originally sent to the Office of General Counsel on April 24, 1980. (RAD 80L-104, D-707). The attached contains an analysis of discrepancies in the reports filed in addition to the other material already referred.

62040344742

REPORTS ANALYSIS REFERRAL SHEET - UPDATE

DATE NOVEMBER 29, 1980 ANALYST Mike Thompson  
 TO: Office of General Counsel TEAM CHIEF Irene Allen  
 THROUGH: STAFF DIRECTOR PA COMPLIANCE REVIEW EG/B  
 FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS AL

CANDIDATE/COMMITTEE: The Simon Committee (Independent Oate to Elect William Simon Pres.)  
 TREASURER: Mr. G. Morgan Jones, III, (Current); C.C. Clinkscales, III, (Former)  
 ADDRESS: P.O. Box "S"  
 Bryn Athyn, PA 19009

AFFILIATE(S):

ALLEGATION(S): ACCEPTANCE OF EXCESSIVE CONTRIBUTIONS CITE: 2 U.S.C. 441a(a)(1) ATTACHMENT(S)

DATE INITIATED:

MANNER IN WHICH REVIEW WAS INITIATED:  
 Normal Review  Other: ATTACHMENT  
 Special Project:

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment 1.

PERIOD COVERED FROM 3/23/80 TO 9/30/80  
 TOTAL RECEIPTS \$ 36,379\* TOTAL EXPENDITURES \$ 36,722\*  
 CASH ON HAND \$ 344\* DEBTS \$ 0 1/2

HISTORY:

RESULTS OF REVIEW: ATTACHMENT  
 Request for Additional Information (& SV) dated 2/15/80 sent to former treas. 2  
 Second Notice dated 3/10/80 sent to current treasurer 4

COMMUNICATIONS WITH CANDIDATE/COMMITTEE: ATTACHMENT  
 Telecon with Mr. Jones, (current treasurer) on 3/06/80 3  
 Telecon with Mr. Jones 4/23/80 5

REASON(S) FOR REFERRAL: ATTACHMENT  
 Failure to respond to RFAI(SV); failure to refund excessive contributions.  
 Ms. Gabriele Pitcairn Pendleton has contributed, to date, in excess of \$19,000  
 to the committee (\$19,838.50).

OTHER PENDING ACTIONS INITIATED BY RAD: ATTACHMENT  
 NONE

OTHER RELEVANT INFORMATION: ATTACHMENT  
 \*Please see Attachment 6: Various discrepancies in reports 6  
 Please see Attachment 7: Copies of all reports and statements filed 7

PREVIOUS OGC/AUDIT REFERRALS FROM RAD: NONE

1/ Please see Attachment 6 for explanation of Discrepancies, Page 2 6

INDEPENDENT EXPENDITORS

COMMITTEE	DOCUMENT	RECEIPTS		EXPENDITURES		DATE	PAGE	RECORDING
		PRIMARY	GENERAL	PRIMARY	GENERAL			
<b>SINON COMMITTEE</b>								
1979	STATEMENT OF ORGANIZATION					4 JUL 79		
	MISCELLANEOUS REPORT					16 JUL 79 FROM FEC		
	MISCELLANEOUS REPORT					10 AUG 79 TO FEC		
	JULY QUARTERLY	4,191		3,474		1 APR 79 - 30 JUN 79		
	REQUEST FOR ADDITIONAL INFORMATION					1 APR 79 - 30 JUN 79		
	REQUEST FOR ADDITIONAL INFORMATION 2ND					1 APR 79 - 30 JUN 79		
	OCTOBER QUARTERLY	13,706		13,138		1 JUL 79 - 30 SEP 79		
	OCTOBER QUARTERLY - AMENDMENT	13,701		13,221		1 JUL 79 - 30 SEP 79		
	REQUEST FOR ADDITIONAL INFORMATION					1 JUL 79 - 30 SEP 79		
	REQUEST FOR ADDITIONAL INFORMATION 2ND					1 JUL 79 - 30 SEP 79		
	YEAR-END	9,047		10,415		1 OCT 79 - 31 DEC 79		
	REQUEST FOR ADDITIONAL INFORMATION					1 OCT 79 - 31 DEC 79		
	REQUEST FOR ADDITIONAL INFORMATION 2ND					1 OCT 79 - 31 DEC 79		
1980	STATEMENT OF ORGANIZATION - AMENDMENT					21 JAN 80		
	STATEMENT OF ORGANIZATION - AMENDMENT					10 APR 80		
	STATEMENT OF ORGANIZATION - AMENDMENT					11 JUL 80		
	APRIL QUARTERLY		5,143	4,734		1 DEC 79 - 31 MAR 80		
	APRIL QUARTERLY - TERMINATED		123	132		1 JAN 80 - 31 MAR 80		
	JULY QUARTERLY		2,100	2,467		1 APR 80 - 30 JUN 80		
	OCTOBER QUARTERLY		7,137	6,811		1 JUL 80 - 30 SEP 80		
	<b>TOTAL</b>	<b>27,019</b>	<b>9,360</b>	<b>27,310</b>	<b>9,412</b>			

30,379

36,722





FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

ATTACHMENT 2

15 February 1980

Mr. C. C. Clinksdales, III, Treasurer  
Independent Committee to Elect William E. Simon President (C99001174)  
P.O. Box "S"  
Bryn Athyn, Pennsylvania 19009

Dear Mr. Clinksdales:

This letter is prompted by the Commission's preliminary review of your July 10, October 10, October 10 Amendment and Year-End, 1979 Reports of Receipts and Expenditures. The review raised questions as to specific contributions and/or expenditures and to the reporting of certain information required by the Federal Election Campaign Act, (the Act). An itemization of these areas follows:

On Schedule A for Lines 14a and 17a, your reports disclose contributions which appear to exceed the limits of 2 U.S.C. 441a. Pertinent portions of your reports are attached so that a review of your records may be made. (Please note also that under 11 C.F.R. 100.4(a)(1)(i), a loan is a contribution to the extent that the obligation remains outstanding). The Act precludes an individual from making contributions to an "other political committee" which, in the aggregate, exceed \$5,000. If you have received contributions which exceed the limits, the Commission recommends that you refund to the donor the amount which is in excess of \$5,000. Refunds should be reported to the Commission immediately by letter and on Schedule B for Line 21a on your next report.

If you find that the contributions in question have been disclosed incompletely or incorrectly, you should amend your original reports with information which would clarify the public record.

Although the Commission may take further legal steps regarding the acceptance of excessive contributions, your prompt refund of the excessive amount to the donor will be taken into consideration by the Commission.

11 C.F.R. 104.10 requires committees that have cash on hand at the time of registration to disclose the source(s) of those funds. Please amend your July 10 Report to provide the source(s) of the \$300 reported on this initial report as beginning cash on hand.

On Schedule C for Line 13 for the October 10 Report, the committee disclosed a loan for \$3,500 from Mrs. Gabriele Pitcairne Pendleton; however, this loan has not been itemized on Schedule A for Line 17a. Please amend your October 10 Report to provide a Schedule A for this loan received.

62093399935

Page Two.

Request for Additional Information.

July 10, October 10, October 10 Amendment and Year-End, 1979 Reports.  
Independent Committee to Elect William E. Simon President (C99001174)

On Schedule A for Line 14a for the July 10 Report, (initial report), the committee itemized contributions from Mrs. Gabriele Pitcairne Pendleton totalling \$1,200; however, the aggregate disclosed for this contributor is \$1,800. Please provide the circumstances for this discrepancy and amend your July 10 Report accordingly.

11 C.F.R. 100.4(a)(1)(f) states that a loan is a contribution to the extent that the obligation remains outstanding. Please amend your October 10 and Year-End Reports to include the loan of \$3,500 from Mrs. Gabriele Pitcairne Pendleton in the totals for Aggregate Year-to-Date contributed.

On Schedule E for Line 23 for the July 10 Report, the committee itemized \$1,895.58 as "Independent Expenditures"; however, the total disclosed is \$1,886.58. Please amend your report accordingly.

The committee's October 10 Amendment contained adjustments to itemized expenditures in the amount of \$30 increase and unitemized expenditures in the amount of \$113 increase. Please amend your October 10 Report to provide the circumstances for these adjustments and provide amended Schedule(s) B as appropriate.

On Schedule A for Line 14a for the Year-End Report, the committee itemized \$5,224 in contributions. However, the total disclosed by the committee is \$5,214. On Schedule B for Line 28a for the Year-End Report, the committee itemized \$9,703.18 in expenditures. However, the total disclosed by the committee is \$9,803.18. Please provide the circumstances for these discrepancies and amend your Year-End Report accordingly.

2 U.S.C. 434(b)(9) requires disclosure of the identification of each person to whom an expenditure has been made by or on behalf of the committee which is in excess of \$100, or in an amount less than \$100 if the total exceeds \$100 for the calendar year, together with the amount, date and particulars of each such expenditure. Please provide the person to whom expenditures have been made along with the amount, date and purpose(s) of each such expenditure, if itemizable, for the following reimbursements, (if expenditures made by such persons were not itemizable, please so state):

Richard M. McNeil	\$147.64	"Itemized Expenses"	October 10 Report
W. McMichael Jones	\$176.02	"Itemized Expenses"	Year-End Report

In addition, advances paid to persons are not considered to be expenditures, but rather a part of the committee's cash on hand, until an expenditure "on behalf of the committee" is made. Such expenditures, when made from the advances funds, should be reported on Schedule B in accordance with 2 U.S.C. 434(b)(9). (Please be advised that under 2 U.S.C. 437b(a)(2), no expenditure may be made except by check drawn on one or more of the committee's designated campaign depositories. Further, 2 U.S.C. 432(b) requires that all funds of a political committee shall be segregated from, and not commingled with, any personal funds). Please amend your October 10 and Year-End Reports to provide the proper information for the following advances:

020898399920

Page Three.

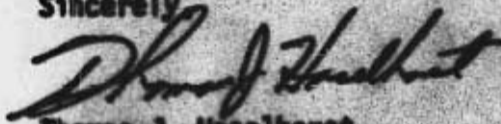
Request for Additional Information.

July 10, October 10, October 10 Amendment and Year-End, 1979 Reports,  
Independent Committee to Elect William E. Simon President (C99001174)

C.C. Clinksdales, III	\$200	"Advance"	October 10 Report
W. McMichael Jones	\$500	"Advance"	Year-End Report

Amendments to your original reports correcting the above matters should be filed at the Commission within fifteen (15) days of the date of this notice. If you need assistance, contact Mike Thompson on the toll-free number, (800) 424-9530. The local number is (202) 523-4048.

Sincerely



Thomas J. Haselhorst  
Assistant Staff Director  
Reports Analysis Division

028233949291



Name of Candidate or Committee in Full  
**Independent Company To Elect William E. Simon President**

Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Gabriela Prosser Pondlaton Box 228, Cairnwood Bryn Arthyn, PA 19009	Housewife Occupation: Housewife	10/3/79 10/10/79 10/20/79 11/6/79 11/20/79	\$125.00 (Party In-Kind) 19.00 (Party In-Kind) 200.00 100.00 200.00
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$5,441.00	11/22/79	200.00
Full Name, Mailing Address and ZIP Code Walter R O'Connell 160 Park Avenue New York City, NY 10022	Principal Place of Business Olin Corp. 460 Park Ave, NY 10022 Occupation: Chairman, Finance Committee	12/22/79	\$1,000.00
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$1,000.00		
Full Name, Mailing Address and ZIP Code William Seldman 160 Park Avenue New York City, NY 10022	Principal Place of Business Phelps Dady Corp. Occupation: Consultant	11/14/79	\$1,000.00
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$1,100.00		
Full Name, Mailing Address and ZIP Code S. Williams 618 Hawthorne Rd. Pittsburgh, PA 15238	Principal Place of Business PPG Industries Occupation: Executive	11/14/79	\$300.00
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$1,000.00		
Full Name, Mailing Address and ZIP Code Ethel Teaker Orks, NE 69041	Principal Place of Business Same Occupation: FARMERS	11/2/79	\$25.00
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$1,250.00		
Full Name, Mailing Address and ZIP Code Samuel Tamposi 2 Ambura St. Nashua, NH 02860	Principal Place of Business Self employed Occupation: Industrial Developer	10/13/79	\$150.00
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$150.00		
Full Name, Mailing Address and ZIP Code Lawrence W. Rathbun 274 1/2 N. Main St. Concord, NH 03301	Principal Place of Business Occupation: Retired	10/15/79 11/6/79	\$200.00 \$100.00
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$300.00		

SUBTOTAL of receipts this page (optional) ..... \$4,809.00  
 TOTAL this period (last page this line number only) ..... \$

4819

Name of Candidate or Committee in Full			
Independent Campaign To Elect William E. Simon President			
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Gabriele Pitcairn Pendleton Cairwood, Box 338 Bryn Athyn, PA 19009	home	7/30/79	\$300.00 ✓
	Occupation housewife	8/30/79	300.00 ✓
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		9/27/79	707.50 <del>ex-kind</del>
		9/29/79	300.00 ✓
Aggregate Year-To-Date ... \$3407.50			
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Mrs. Mabel K. Johnson 3400 Morgan Road Ann Arbor, MI 48104	same	8/14/79	\$500.00 ✓
	Occupation housewife		
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Aggregate Year-To-Date ... \$ 500.00			
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Mr. James A. Morrison 3920 B 70th Avenue Crt. West Tacoma, WA 98466	United Airlines SEA-TAC Airport, Seattle	8/6/79	\$100.00
	Occupation Airline pilot	8/24/79	50.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Aggregate Year-To-Date ... \$ 150.00			
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Garth Pitcairn 600 Woodward Drive Huntingdon Valley, PA 19006	Pitcairn Volkswagen, Inc. Route 1 Morrisville, Pa 19067	8/13/79	\$1,000.00 ✓
	Occupation Automobile Dealer		
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Aggregate Year-To-Date ... \$1,000.00			
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Joseph A. Gallagher 1700 Market Street Philadelphia, PA 19103	Industrial Valley Bank Philadelphia, PA	8/27/79	\$200.00 ✓
	Occupation President		
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Aggregate Year-To-Date ... \$200.00			
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Mrs. Hebe Dick Baldwin 225 South 8th Street Philadelphia, PA 19106	home	8/27/79	\$25.00
	Occupation housewife	9/7/79	975.00 ✓
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Aggregate Year-To-Date ... \$1,000			
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Mr. Dan Pitner P. O. Box 113 Tupelo, MS 38801	home	8/30/79	\$250.00 ✓
	Occupation		
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Aggregate Year-To-Date ... \$ 250.00			
SUBTOTAL of receipts this page (optional) .....			\$ 4,707.50
TOTAL this period (last page this line number only) .....			\$

Indicate Primary or General Election for each Entry

Name of Debtor and Creditor in Full

Full Name, Mailing Address and ZIP Code of Debtor or Creditor

Mrs. Gabrielle Pittsira Rendleton  
Box 388, "Carnessed"  
Bryn Athyn, PA 19009

Date (month, day, year)

8/28/79

Amount of Original Debt, Contract, Agreement or Promise

\$3,500.00

Cumulative Payment To Date

\$ .00

Outstanding Balance at Close of This Period

\$3,500.00

Primary  General  Other

NATURE OF OBLIGATION (Details of Debt):

financial transfer to pay for magazine ads. To be re-paid by campaign

Full Name, Mailing Address and ZIP Code of Debtor or Creditor

Date (month, day, year)

Amount of Original Debt, Contract, Agreement or Promise

Cumulative Payment To Date

Outstanding Balance at Close of This Period

Primary  General  Other

NATURE OF OBLIGATION (Details of Debt):

Full Name, Mailing Address and ZIP Code of Debtor or Creditor

Date (month, day, year)

Amount of Original Debt, Contract, Agreement or Promise

Cumulative Payment To Date

Outstanding Balance at Close of This Period

Primary  General  Other

NATURE OF OBLIGATION (Details of Debt):

SUBTOTALS this period this page (optional) . . . . .

\$

\$

\$

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

\$

\$

\$3,500.00

Carry outstanding balance only to appropriate line of summary.

H  
0202339994



July, 1979  
Federal Election Commission  
435 K Street, N.W.  
Washington, D.C. 20543

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

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

Line Number 14

Use Separate Schedules for  
each numbered line

Name of Candidate or Committee in Full  
**Independent Campaign to Elect William E. Simon President**

Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Gabriele Pitcairn Fendleton Cairwood, Box 338 Bryn Athyn, PA 19009	home	4/16/79	\$300.00 <i>75</i>
	Occupation housewife	4/28/79	\$300.00 <i>15</i>
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		5/29/79	\$300.00 <i>15</i>
<input type="checkbox"/> Check if Contributor is self-employed		6/28/79	\$300.00 <i>15</i>
Aggregate Year-To-Date ... \$ 1,800.00			
Willard D. Fendleton 3032 Huntingdon Pike Bryn Athyn, PA 19009	home	6/14/79	\$1,000.00
	Occupation retired bishop		<i>15</i>
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
<input type="checkbox"/> Check if Contributor is self-employed			
Aggregate Year-To-Date ... \$ 1,000.00			
Lloyd Johnson 3400 Morgan Road Ann Arbor, MI 48104	Whitehall Convalescent Homes 3400 Morgan Road Ann Arbor, MI 48104	4/28/79	\$1,000.00
	Occupation President of corporation		<i>15</i>
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
<input type="checkbox"/> Check if Contributor is self-employed			
Aggregate Year-To-Date ... \$ 1,000.00			
Michael & Joan Votto 664 Second Street Pike Southampton, PA 18996		5/25/79	\$400.00 <i>15</i>
	Occupation Self-employed		<i>15</i>
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
<input type="checkbox"/> Check if Contributor is self-employed			
Aggregate Year-To-Date ... \$ 400.00			
Full Name, Mailing Address and ZIP Code		Date (month, day, year)	Amount of each Receipt this Period
Principal Place of Business			
Occupation			
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
<input type="checkbox"/> Check if Contributor is self-employed			
Aggregate Year-To-Date ... \$			
Full Name, Mailing Address and ZIP Code		Date (month, day, year)	Amount of each Receipt this Period
Principal Place of Business			
Occupation			
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
<input type="checkbox"/> Check if Contributor is self-employed			
Aggregate Year-To-Date ... \$			
Full Name, Mailing Address and ZIP Code		Date (month, day, year)	Amount of each Receipt this Period
Principal Place of Business			
Occupation			
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
<input type="checkbox"/> Check if Contributor is self-employed			
Aggregate Year-To-Date ... \$			
SUBTOTAL of receipts this page (optional) .....			\$ 3,600.00
TOTAL this period (last page this line number only) .....			\$ 4,181.00

FEC  
DOCUMENT  
SEPARATOR

TELECON

ANALYST Mike Thompson  
initiated call?                     

TELECON WITH: Mr. Morgan Jones, National Campaign Director  
initiated call? yes

Candidate/Committee: Independent Committee to elect William Simon President

DATE: March 6, 1980

SUBJECT(s): SV for excessive contributions and RFAI for disclosure provisions

Mr. Jones called to say that Mr. Clinksdales, the former treasurer, has refused to release the records of the committee for the period during which he was the treasurer. Mr. Jones came to the committee around December, 1979 or January 1980 and was not familiar with the operation of the committee but agreed to take over. The committee has since appointed a new treasurer, (for which I requested an amendment to the committee's Statement of Organization).

I told him that a response was due on the RFAI and SV and that the only thing that I could do was make note of the problems in the committee's file. I suggested that he research what was available and make any necessary refunds as soon as possible.

I suggested that Mr. Jones send a letter to the Commission explaining the circumstances and detailing his efforts in the matter. This would serve to indicate, publicly, that he was not ignoring the issues. He said that he would send a letter today.

He asked for a copy of the Year-End Report. I gave him the phone number for Public Disclosure Division and explained how to get copies of documents.

02040344753

(215) NO LISTING IN  
CR-10 4/1/80  
for G. Morgan Jones.  
(215) 947-2234





FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

ATTACHMENT 4

10 March 1980

Mr. G. Morgan Jones, III, National Campaign Director  
Independent Committee to Elect William E. Simon President (C99001174)  
P.O. Box "S"  
Bryn Athyn, Pennsylvania 19009

Reference: July 10 Report, 1979 (4/1/79 - 6/30/79)  
October 10 Report, 1979 (7/1/79 - 9/30/79)  
October 10 Amended Report, 1979 (7/1/79 - 9/30/79)  
Year-End Report, 1979 (10/1/79 - 12/31/79)

Dear Mr. Jones:

This letter is to inform you that as of this date, the Commission has not received your response to our request for additional information, dated 15 February 1980. That notice requested information essential to full public disclosure of your Federal election financial activity and to assure compliance with the provisions of the Federal Election Campaign Act, (the Act).

If no response is received within fifteen (15) days of the date of this notice, the Commission may choose to take legal action to insure compliance with the Act.

If you have any questions, contact Mike Thompson on the toll-free number, (800) 424-9530. The local number is (202) 523-4048.

Sincerely,

*Thomas J. Haselhorst*  
for Thomas J. Haselhorst  
Assistant Staff Director  
Reports Analysis Division

Attachment: Request for Additional Information  
dated 15 February 1980

620231989570

TELECON

ANALYST Nike Thompson  
initiated call? yes

TELECON WITH: Mr. G. Morgan Jones, Treasurer  
initiated call? \_\_\_\_\_

(215) 947-2234

Candidate/Committee: Independent Committee to Elect William E. Simon President  
(C99001174)

DATE: 4/23/80

SUBJECT(s): Possible excessive contributions; filing of TWO April 15 reports;  
one by old treasurer and one by current treasurer

I called Mr. Jones to see if he had requested copies of all previous reports filed by the committee from the Commission. He said no, that he had decided to try to obtain them and the records of the committee from Mr. Clinkscales, the former treasurer, (who had refused to release them).

Mr. Jones was in Washington last week and visited the offices of Mr. Clinkscales but he was not in.

I told Mr. Jones that the matter of possible excessive contributions was a rather serious matter and that it would be best to make an attempt to correct the situation, (although I agreed that without the records this may be difficult). I agreed to send Mr. Jones copies of the reports previously submitted by the committee including the most recent report.

Mr. Clinkscales has filed an April 15 Termination Report with the Commission covering the period from 1/1/80 through 3/31/80. Mr. Jones has filed an April 15 Report covering the period from 12/11/79 through 3/31/80. The reports are widely different as would be expected. However, there are contributions from Ms. Gabrielle Pitcairne which are further in excess of the limits during 1979 on Mr. Jones' report which were not reported on the original Year-End Report filed by Mr. Clinkscales.

I explained that the more important problem at this point is the excessive contributions. I suggested that the loan repayment plus any amount of contribution refund which would reduce the amount of the contribution to \$5,000 would be the best way to handle the situation. He will try to do what he can considering the circumstances.

I also requested that he send a letter to the Commission explaining that he is working on the problem and that a response will be submitted as soon as he can determine what the proper course of action would be.

62040314755

OTHER RELEVANT INFORMATION:

1. The RFAI and circumstances after the 1979 Year-End Report:

The RFAI, covering through the committee's 1979 Year-End Report, addressed contributions totalling \$8,351.50 from Mrs. Gabrielle Pitcairn Pendleton, the committee's Chairman. It was mailed to Mr. C.C. Clinkscales, III, the treasurer of the committee for that period. However, Mr. G. Morgan Jones, III was by that time the treasurer of the committee having assumed the duties in late December or early January. The problems were explained to Mr. Jones and he agreed to make an attempt to correct those problems.

Since the 1979 Year-End Report, Mrs. Pendleton has contributed an additional \$10,887.00 to the committee. The total disclosed, (itemized), by the committee is now at \$19,238.50\* or \$14,238.50 in excess of the limits of 2 U.S.C. 441a(a)(1).

The current treasurer, Mr. Jones, has attempted to obtain the committee's records from the former treasurer, Mr. Clinkscales, who has apparently refused to release them.

Copies of reports were sent to Mr. Jones upon his request and it was suggested to Mr. Jones that he notify the Commission in writing of his problems and his efforts to resolve the matter. Mr. Jones was informed of the limitations on contributions and was informed of the serious nature of such possible violations. (See telecons, Attachments 3 & 5.) No such document has been received from Mr. Jones. In fact, no response to this RFAI or the telecons has been received.

Please see Attachment 7 for copies of all reports and statements filed by the committee and by Mrs. Pendleton.

\*These amounts are as itemized by the committee. Mrs. Pendleton filed two reports of Independent Expenditures, however, which seem to be actually activity of the "committee." (See Attachments 7(G) & 7(H).) The first report from Mrs. Pendleton is noted as an April 10 Quarterly Report and covers the period from "inception" through March 31, 1979. She "contributed" a total of \$600 and expended \$300 leaving a "balance" of \$300.

The first report filed by the committee, the July 10 Quarterly Report, discloses \$300 initial cash on hand and an aggregate of \$600 greater than itemized for Mrs. Pendleton, (\$1,200 itemized contributions and \$1,800 aggregate year-to-date). These circumstances suggest that the \$600 Mrs. Pendleton "contributed" to herself was actually contributed to the committee during the April 10 reporting period. Mrs. Pendleton's July 10 Report of Independent Expenditures and Contributions simply discloses a total of \$1,200 in "Independent Contributions" which matches that itemized by the committee from her for this period.

Her total contributions then, including the \$600 during the April 10 reporting period, is \$19,838.50 or \$14,838.50 excessive.

62040344756



ATTACHMENT 6, (Continued):

**2. Discrepancies in Reports:**

Although many minor discrepancies were noted through 1979 Year-End Report, the most obvious problem occurred when two distinct April 15, 1980 Reports were filed by the committee.

The former treasurer, Mr. Clinkscales, filed an April 15 Termination Report which disclosed \$1.00 as closing cash on hand but \$3,500 debts owed by the committee. (The debt was a loan outstanding from Mrs. Pendleton.) The current treasurer, Mr. Jones, also filed an April 15 Report but this report overlapped coverage dates back into 1979 and disclosed \$824 in debts owed by the committee - this report excluded the \$3,500 owed to Mrs. Pendleton. In addition, this report disclosed an additional contribution from Mrs. Pendleton which had not been previously reported on the committee's, (Mr. Clinkscale's), 1979 Year-End Report.

The discrepancy in receipts, expenditures and cash on hand appears to be caused by these two widely differing reports.

NOTE:

The committee registered as a Single Candidate Unauthorized Committee supporting the candidacy of William Simon for President. Mr. Simon promptly disavowed the committee and never became a candidate. Therefore, RAD has proceeded on the premise that the contribution limitation from an individual is \$5,000. 2 U.S.C. 441a(a)(1)(C).

62040314757

OTHER RELEVANT INFORMATION

INDEX TO REPORTS AND STATEMENTS FILED:

STATEMENTS:

Statement of Organization (7/06/79) . . . . .	A
Disavowal Letter from Commission to Mr. Simon (7/16/79) . . . . .	B
Letter from Mr. Simon Disavowing Committee (8/10/79) . . . . .	C
Statement of Organization Amendment (1/21/80) . . . . .	D
Statement of Organization Amendment (4/10/80) . . . . .	E
Statement of Organization Amendment (7/16/80) . . . . .	F

REPORTS:

Report of Independent Expenditures filed by Mrs. Pendleton (4/09/79)	G
Report of Independent Expenditures filed by Mrs. Pendleton (7/06/79)	H
July 10 Report from Committee - Initial Report (7/06/79) . . . . .	I
October 10 Report from Committee (10/11/79) . . . . .	J
October 10 Amendment from Committee (2/04/80) . . . . .	K
Year-End Report from Committee (2/04/80) . . . . .	L
April 15 Termination Report from former treasurer (4/18/80) . . . . .	M
April 15 Report from new treasurer (4/12/80) . . . . .	N
July 15 Report from committee (7/16/80) . . . . .	O
October 15 Report from committee (10/14/80) . . . . .	P

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Statement of Organization  
For a Political Committee

Supporting any candidate for federal office and contributing contributions or expenditures in excess of \$1,000 in any calendar year in support of such candidate.

(See Reverse Side For Instructions.)

RECEIVED  
FEDERAL ELECTION  
COMMISSION

7(A)

Note: Committees authorized by a candidate to receive contributions and make expenditures in connection with such campaign must maintain separate records with respect to such activities.

78 JUL 6 PM 12:34

1 (a) Name of Committee (in full)  Check if name or address is changed  
Independent Campaign to Elect William E. Simon  
President

2 Identification Number  
None

3 (a) Address (number and street)  
P.O. Box 28290

3 Date  
June 27, 1977

4 (a) City, State and ZIP code  
Washington, D.C. 20005

4 Is this an amended statement  Yes  No  
If "YES" FILL IN ONLY THOSE LINES ON WHICH THERE HAS BEEN A CHANGE

5 Check one:  
 (a) This committee has been designated as the principal campaign committee for \_\_\_\_\_ (Name of Candidate)  
a candidate for \_\_\_\_\_ (Federal office sought) in the \_\_\_\_\_ (Year of election) Election  
to be held in the State of \_\_\_\_\_ (State in which election is held)

(THE PRINCIPAL CAMPAIGN COMMITTEE WILL FORWARD TO THE COMMISSION A COPY OF THE STATEMENT OF ORGANIZATION FOR EACH AFFILIATED COMMITTEE REQUIRED TO FILE WITH IT.)

(b) This committee is supporting only one candidate, and is authorized by \_\_\_\_\_ (Name of Candidate)  
to receive contributions and make expenditures with respect to the \_\_\_\_\_ Election(s)  
held in \_\_\_\_\_ (Year of election in State), and will file all reports and statements with the candidate's principal campaign committee, \_\_\_\_\_ (Full name of principal campaign committee)

(ATTACH A COPY OF CANDIDATE'S WRITTEN AUTHORIZATION.) (FEC FORM 2a)

(c) This committee supports only one candidate William E. Simon (Name of Candidate) but is not an authorized committee.  
 (d) This committee supports more than one Federal candidate and is not a party committee.  
 (e) This committee is a \_\_\_\_\_ committee of the \_\_\_\_\_ Party.  
(National, State, county, city) (Democratic, Republican, etc.)

6 Names of affiliated and/or connected organizations	Mailing address and ZIP code	Relationship
None		

If the registering political committee has identified a "connected organization" above, please indicate type of organization:  
 Corporation  Labor organization  Membership organization  Trade association  Cooperative  
 Corporation without capital stock  Other (please specify)

Submit additional information on separate continuation sheets appropriately labeled and attached to this Statement of Organization. Indicate in the appropriate section above when information is continued on separate page(s).

79031013575  
62040344759



Name of Committee  
**Independent Campaign to Elect William E. Simon President**

- 7 Area, Scope and Jurisdiction of Committee:
- (a) Will this committee operate in more than one State?  Yes  No  
 (b) Will it operate on a statewide basis in one State?  Yes  No  
 (c) Will it primarily support candidates seeking State or local office?  Yes  No  
 (d) Will it support or does it anticipate supporting directly or indirectly, candidates for Federal office in excess of \$1,000 in a calendar year?  Yes  No

8 (a) List by name, address, office sought, and party affiliation, any candidates for Federal office that this committee is supporting:

Full name(s) of candidate(s)	Mailing address and ZIP code	Office sought	Party
William E. Simon	Unknown	President of the United States	Republican

(b) List by name, address, office sought, and party affiliation, any candidate(s) for any other public office(s) that this committee is supporting (unless the committee is supporting the entire ticket of a party as indicated in line 9)

Full name(s) of candidate(s)	Mailing address and ZIP code	Office sought	Party

9 If this committee is supporting the entire ticket of a party, give name of party **N/A**

10 Identify by name, address and position, the person in possession of committee books and records:

Full name	Mailing address and ZIP code	Title or position
C.C. Clinkscapes, III	Suite 1300, 777 Fourteenth St., NW Washington, D.C. 20005	Trustee / Treasurer

Submit additional information on separate continuation sheets appropriately labeled and attached to this Statement of Organization. Indicate in the appropriate section above when information is continued on separate page(s).

79031013576  
 82040344760

72040343577

Name of Committee: Independent Campaign to Elect William E. Simon President JUL 6 PM 12:34

11 List by name, address and position, other principal officers of the committee (include chairman, treasurer, secretary, assistant treasurer, assistant secretary, members of finance committee):

Full name	Mailing address and ZIP code	Title or position
Mrs. Gabriele Pitsen Bandker	Cairwood, Box 338 Bryn Athyn, PA 19009	Chairman

12 Does this committee plan to stay in existence beyond the current calendar year?  Yes  No  
 If "Yes" for how long? 10 months

13 In the event of dissolution, what disposition will be made of residual funds? Returned to contributors or dispersed to other political committee & federal offices.

14 List all banks or other repositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds:

Name of bank, repository, etc.	Mailing address and ZIP code
National Savings & Trust (checking account)	15th St. & New York Ave., N.W. Washington, DC 20005

15 List all election reports required to be filed by this committee with States and local jurisdictions, together with the names, addresses, and positions of the recipients of the reports (other than reports filed with Secretaries of State pursuant to USC 430(a)):


Report title	Dates required	Name and position of recipient	Mailing address and ZIP code
none			

Submit additional information on separate continuation sheets appropriately labeled and attached to this Statement of Organization, indicate in the appropriate section above when information is continued on separate page(s).

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

[Signature] (Signature of Treasurer) June 29, 1979 (Date)

Note: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. §437g or §441 (see instructions)

For further information contact:  Federal Election Commission  
 1325 K Street, N.W.  
 Washington, D.C. 20463



FEDERAL ELECTION COMMISSION

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

July 16, 1979

Honorable William E. Simon  
Office of Booze, Allen and Hamilton  
2445 Park Avenue  
New York, NY 10017

Dear Mr. Simon:

This letter is prompted by the Federal Election Commission's interest in assisting persons who wish to comply with the Federal Election Campaign Act. It has come to the attention of the Commission that certain individuals or persons are receiving contributions and/or making expenditures on your behalf. Records at the Commission show that the Independent Campaign To Elect William E. Simon President filed a Statement of Organization on July 6, 1979, which listed your name as the candidate being supported by that committee.

The Federal Election Campaign Act defines a "candidate" to be an individual who has taken the action necessary under State law to qualify himself for nomination for, or election to, Federal office or has received contributions or made expenditures or given his consent to any other person to receive contributions or make expenditures on his behalf.

Part 100.2(c) of the Commission's Regulations (11 CFR 100.2(c)) provides that an individual becomes a candidate --

If after written notification by the Commission that any other person is receiving contributions or making expenditures on the individual's behalf, the individual fails to disavow this activity by letter to the Commission within 30 days of receipt of the notification.

This letter constitutes formal written notification that certain persons are receiving contributions or making expenditures on your behalf. You have thirty days from receipt of this notification to disavow these activities. To disavow send a letter directly to the Commission at the above address, marked Attention, Reports Analysis Division.

If you do not disavow these activities, you should file within 30 days of when you became a candidate a Statement of Candidacy and any required reports of receipts and expenditures. Copies of these forms are enclosed and should be filed with the Federal Election Commission.

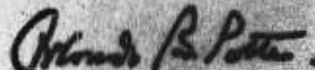
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If you are a candidate and you fail to comply with the requirements imposed on candidates for Federal office which are stipulated by the Act, the Commission may find reason to believe you are in possible violation of 2 U.S.C. Sections 432, 433 and 434 of the Act.

If you require additional information, please contact our Reports Analysis Division on the toll free number (800)424-9530. Our local number is (202)523-4048.

Sincerely,



Orlando B. Potter  
Staff Director

Certified Mail  
Return Receipt Requested

Enclosures

79031020014  
62040344763

WILLIAM E. SIMON  
28<sup>th</sup> Floor  
1221 AVENUE OF THE AMERICAS  
New York, New York 10020

FEDERAL ELECTION COMMISSION

79 JUL 10 PM 12:18

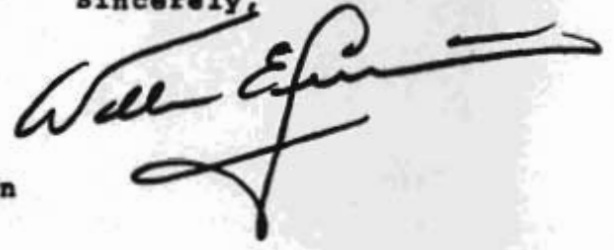
July 30, 1979

Gentlemen:

On July 20, 1979 I received a letter dated July 16 from your Staff Director, Mr. Orlando B. Potter, notifying me that a Statement of Organization was filed with the Federal Election Commission on July 6, 1979, by the "Independent Campaign to Elect William E. Simon President".

Pursuant to Section 100.2(c) of the Commission's regulations, 11 C.F.R. paragraph 100.2(c), I hereby disavow any activity on my behalf by the "Independent Campaign to Elect William E. Simon President".

Sincerely,



Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463  
att: Reports Analysis Division

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7903102070



Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463  
att: Reports Analysis Division

79 AUG 10 PM 12:18

RECEIVED  
FEDERAL ELECTION  
COMMISSION



COMMITTEE  
 Independent Campaign to Elect  
 WILLIAM E. SIMON  
 President

Mrs. Gabriele Pitcairn Pendleton, Chairman  
 Mrs. Alfred Wolf, Secretary  
 G.G. Chinkscates, III, Treasurer

Suite 1300  
 777 14th Street, N.W.  
 Washington, D.C. 20005  
 (202) 638-5886

Mr Louis L. Boyle  
 Federal Election Commission  
 1325 K Street N.W.  
 Washington D.C. 20463

January 3, 1980

Dear Mr Boyle,

Thank you for the forms which I picked up when I visited your office. Enclosed please find our FEC Form 1. We have changed the Name (from Campaign to Committee) and the address (from Washington D.C. to Bryn Athyn, Pa.) Mrs Pendleton continues to be Chairman and my function is National Campaign Director. We are awaiting a final 1979 year end report copy from Mr Chinkscates in Washington and will file the appropriate forms as required.

Sincerely,  
 G. Morgan Jones, III

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FEC Form 1  
 July 1978  
 Federal Election Commission  
 1125 H Street, N.W.  
 Washington, D.C. 20463

## Statement of Organization For a Political Committee

Supporting any candidate(s) for federal office and accepting contribu-  
 tions or expenditures in excess of \$1,000 in any calendar year in support  
 of such candidate(s).  
 (See Reverse Side For Instructions.)

RECEIVED  
 FEDERAL ELECTION  
 COMMISSION

'80 JAN 21 AM 9:12

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

1(a) Name of Committee (in full) <input type="checkbox"/> Check if name or address is changed <b>INDEPENDENT COMMITTEE TO ELECT          WILLIAM G. SIMON, PRESIDENT</b>	2 Identification Number
1(b) Address (number and street) <b>P.O. BOX "S"</b>	3 Date <b>January 3, 1980</b>
1(c) City, State and ZIP code <b>BRYN ATHYN, PA, 19009</b>	4 Is this an amended statement? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No IF "YES" FILL IN ONLY THOSE LINES ON WHICH THERE HAS BEEN A CHANGE

Check one:  
 (a) This committee has been designated as the principal campaign committee for \_\_\_\_\_  
(Name of Candidate)  
 a candidate for \_\_\_\_\_ in the \_\_\_\_\_ Election  
(Federal office sought) (Year of election)  
 to be held in the State of \_\_\_\_\_  
(State in which election is held)  
**(THE PRINCIPAL CAMPAIGN COMMITTEE WILL FORWARD TO THE COMMISSION A COPY OF THE STATEMENT OF ORGANIZATION FOR EACH AFFILIATED COMMITTEE REQUIRED TO FILE WITH IT.)**

(b) This committee is supporting only one candidate, and is authorized by \_\_\_\_\_  
(Name of Candidate)  
 to receive contributions and make expenditures with respect to the \_\_\_\_\_ Election;  
(General, Primary, Runoff, etc.)  
 held in \_\_\_\_\_, and will file all reports and statements with the candidate's principal campaign  
(Year of election in State)  
 committee, \_\_\_\_\_  
(Full name of principal campaign committee)  
**(ATTACH A COPY OF CANDIDATE'S WRITTEN AUTHORIZATION.) (FEC FORM 2a)**

(c) This committee supports only one candidate \_\_\_\_\_ but is not an authorized committee.  
(Name of Candidate)

(d) This committee supports more than one Federal candidate and is not a party committee.

(e) This committee is a \_\_\_\_\_ committee of the \_\_\_\_\_ Party.  
(National, State, county, city) (Democratic, Republican, etc.)

8 Names of affiliated and/or connected organizations	Mailing address and ZIP code	Relationship

If the registering political committee has identified a "connected organization" above, please indicate type of organization:  
 Corporation     Labor organization     Membership organization     Trade association     Cooperative  
 Corporation without capital stock     Other (please specify)

Submit additional information on separate continuation sheets appropriately labeled and attached to this Statement of Organization. Indicate in the appropriate section above when information is continued on separate page(s).

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1/5

STATEMENT OF ORGANIZATION

7(E)

(See reverse side for instructions)

1. (a) Name of Committee (in Full)  Check if name or address is changed.  
 INDEPENDENT COMMITTEE TO ELECT WILLIAM E. SIMMONS SENATOR

2. Date 4.8.80

(b) Address (Number and Street)  
 P.O. Box S

3. FEC Identification Number  
 C99001174

(c) City, State and ZIP Code  
 BRYN ATHYN, PA. 17009

4. Is this an amended Statement?  YES  NO

5. TYPE OF COMMITTEE (check one): **THIS IS A DRAFT COMMITTEE NOT AUTHORIZED BY CANDIDATE**

(a) This committee is a principal campaign committee. (Complete the candidate information below.)

(b) This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)

Name of Candidate	Candidate Party Affiliation	Office Sought	State/District
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(c) This committee supports/opposes only one candidate \_\_\_\_\_ and is NOT an authorized committee. (name of candidate)

(d) This committee is a \_\_\_\_\_ committee of the \_\_\_\_\_ Party. (National, State or subordinate) (Democratic, Republican, etc.)

(e) This committee is a separate segregated fund.

(f) This committee supports/opposes more than one Federal candidate and is NOT a separate segregated fund nor a party committee.

Name of Any Connected Organization or Affiliated Committee	Mailing Address and ZIP Code	Relationship
NONE		

If the registering political committee has identified a "connected organization" above, please indicate type of organization:

Corporation  Corporation w/o Capital Stock  Labor Organization  Membership Organization  Trade Association  Cooperative

7. Custodian of Records: Identify by name, address (phone number - optional) and position, the person in possession of committee books and records.

Full Name: G. MORGAN JONES  
 Mailing Address and ZIP Code: 761 FETTERS MILL ROAD HUNTINGDON VALLEY PA 17036  
 Title or Position: NATIONAL CAMPAIGN DIRECTOR  
 PHONE: 215-947-2234

8. Treasurer: List the name and address (phone number - optional) of the treasurer of the committee; and the name and address of any designated agent (e.g., assistant treasurer).

Full Name: G. MORGAN JONES  
 Mailing Address and ZIP Code: 761 FETTERS MILL RD. HUNTINGDON VALLEY, PA, 17036  
 Title or Position: TREASURER

9. Banks or Other Depositories: List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

Name of Bank, Depository, etc.: CONCORD NATIONAL BANK.  
 Mailing Address and ZIP Code: 43 N. MAIN ST. CONCORD N.H 03301

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

G. MORGAN JONES  
 Type or Print Name of Treasurer

*G. Morgan Jones*  
 SIGNATURE OF TREASURER

4.8.80  
 Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. §437g.

For further information contact: Federal Election Commission, Toll Free 800-424-9530. Local 202-523-4068

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Statement of Organization  
 for a Political Committee

Supporting any candidate for Federal office and accepting contributions or expenditures in excess of \$1,000 in any calendar year in support of such candidate(s).

(See Reverse Side For Instructions.)

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 7(F)  
 '80 JUL 16 11 21 AM

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

1(a) Name of Committee (in full) <input checked="" type="checkbox"/> Check if name or address is changed <b>THE SIMON COMMITTEE</b>	2 Identification Number <b>C 9900 11 74</b>
1(b) Address (number and street) <b>P.O. BOX S</b>	3 Date <b>JULY 10, 1980</b>
1(c) City, State and ZIP code <b>BRYN ATHYN, PA, 19009</b>	4 Is this an amended statement? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "YES" FILL IN ONLY THOSE LINES ON WHICH THERE HAS BEEN A CHANGE

5 Check one:

(a) This committee has been designated as the principal campaign committee for \_\_\_\_\_ (Name of Candidate) a candidate for \_\_\_\_\_ (Federal office sought) in the \_\_\_\_\_ (Year of election) Election to be held in the State of \_\_\_\_\_ (State in which election is held)

(THE PRINCIPAL CAMPAIGN COMMITTEE WILL FORWARD TO THE COMMISSION A COPY OF THE STATEMENT OF ORGANIZATION FOR EACH AFFILIATED COMMITTEE REQUIRED TO FILE WITH IT.)

(b) This committee is supporting only one candidate, and is authorized by \_\_\_\_\_ (Name of Candidate) to receive contributions and make expenditures with respect to the \_\_\_\_\_ (General, Primary, Runoff, etc.) Election(s) held in \_\_\_\_\_ (Year of election in State), and will file all reports and statements with the candidate's principal campaign committee, \_\_\_\_\_ (Full name of principal campaign committee)

(ATTACH A COPY OF CANDIDATE'S WRITTEN AUTHORIZATION.) (FEC FORM 2a)

(c) This committee supports only one candidate **WILLIAM E. SIMON** (Name of Candidate) but is not an authorized committee.

(d) This committee supports more than one Federal candidate and is not a party committee.

(e) This committee is a \_\_\_\_\_ (National, State, county, city) committee of the \_\_\_\_\_ (Democratic, Republican, etc.) Party.

0 8 8 0 3 P H A 7 6 9 3

6 Names of affiliated and/or connected organizations	Mailing address and ZIP code	Relationship
<b>NONE</b>		

If the registering political committee has identified a "connected organization" above, please indicate type of organization:

Corporation     Labor organization     Membership organization     Trade association     Cooperative  
 Corporation without capital stock     Other (please specify)

Submit additional information on separate continuation sheets appropriately labeled and attached to this Statement of Organization. Indicate in the appropriate section above when information is continued on separate page(s).

Name of Committee **THE SIMON COMMITTEE**

7 Area, Scope and Jurisdiction of Committee:

- (a) Will this committee operate in more than one State?  Yes  No  
 (b) Will it operate on a statewide basis in one State?  Yes  No  
 (c) Will it primarily support candidates seeking State or local office?  Yes  No  
 (d) Will it support or does it anticipate supporting directly or indirectly, candidates for Federal office in excess of \$1,000 in a calendar year?  Yes  No

8 (a) List by name, address, office sought, and party affiliation, any candidates for Federal office that this committee is supporting:

Full name(s) of candidate(s)	Mailing address and ZIP code	Office sought	Party
<del>None at this present date</del> WILLIAM F SIMON	P.O. Box "5" BRYN ATHYN, PA 19009	PRESIDENT	REPUBLICAN

(b) List by name, address, office sought, and party affiliation, any candidate(s) for any other public office(s) that this committee is supporting (unless the committee is supporting the entire ticket of a party as indicated in line 9)

Full name(s) of candidate(s)	Mailing address and ZIP code	Office sought	Party

9 If this committee is supporting the entire ticket of a party, give name of party ▶

10 Identify by name, address and position, the person in possession of committee books and records:

Full name	Mailing address and ZIP code	Title or position

Submit additional information on separate continuation sheets appropriately labeled and attached to this Statement of Organization. Indicate in the appropriate section above when information is continued on separate page(s).

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Name of Committee: **THE SIMON COMMITTEE**

11 List by name, address and position, other principal officers of the committee (include chairman, treasurer, secretary, assistant treasurer, assistant secretary, members of finance committee):

Full name	Mailing address and ZIP code	Title or position
<b>GABRIELE PITCAIRN FOLEYTON, CHAT</b>		<b>CHAIRMAN</b>
<b>G. MORGAN JONES, III</b>	<b>P.O. BOX 5 BRYN ATHYN, PA, 19009</b>	<b>TREASURER.</b>

12 Does this committee plan to stay in existence beyond the current calendar year?  
 If "Yes" for how long? **UNDETERMINED**  Yes  No

13 In the event of dissolution, what disposition will be made of residual funds? \_\_\_\_\_

14 List all banks or other repositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds:

Name of bank, repository, etc.	Mailing address and ZIP code
<b>CONCORD NATIONAL BANK MAIN STREET CONCORD N.H. 03301</b>	<b>MAIN STREET CONCORD N.H. 03301</b>

15 List all election reports required to be filed by this committee with State and local jurisdictions, together with the names, addresses, and positions of the recipients of the reports (other than reports filed with Secretaries of State pursuant to USC 438(a)):

Report title	Dates required	Name and position of recipient	Mailing address and ZIP code
<b>FEC FORM 3X</b>	<b>QUARTERLY</b>	<b>F. E. C.</b>	<b>1325 K ST NW. WASHINGTON D.C. 2046.</b>

Submit additional information on separate continuation sheets appropriately labeled and attached to this Statement of Organization. Indicate in the appropriate section above when information is continued on separate page(s).

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

**S. Morgan Jones, III** **7.10.80**  
 (Signature of Treasurer) (Date)

Note: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. § 437g or § 441j (see instructions)

For further information contact: Federal Election Commission  
 1325 K Street, N.W.  
 Washington, D.C. 20463

b 28083A 3A 2895



ON CONTRIBUTIONS BY PERSONS

(To be used by an individual or a person other than political committee)

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
APR 10 8 59 PM '79

1. (a) Name (in full) <b>Gabriel Pitcairn Pendleton</b>	2. Identification Number none
(b) Address (number and street) <b>Cairwood</b>	3. This is an Independent Expenditure: <input checked="" type="checkbox"/> In support of Federal candidates <input type="checkbox"/> In opposition to Federal candidates.
(c) City, State and ZIP Code <b>Bryn Athyn, PA 19009</b>	(e) Occupation <b>housewife</b>
(d) Principal Place of Business <b>home</b>	

4. Type of Report (check appropriate box and complete)

(a)  Amendment for \_\_\_\_\_ (which report) (d)  October 10 Quarterly Report  
 (b)  April 10 Quarterly Report (e)  January 31 Year End Report  
 (c)  July 10 Quarterly Report

(f)  Tenth day report preceding \_\_\_\_\_ election on \_\_\_\_\_ in the State of \_\_\_\_\_  
 (primary, general or convention) (date)

(g)  Thirtieth day report following \_\_\_\_\_ election on \_\_\_\_\_ in the State of \_\_\_\_\_  
 (primary, general or convention) (date)

5. This report covers the period inception through March 31, 1979

Complete either Line 6 or Line 7 whichever is appropriate. **CONTRIBUTIONS**

6.

Full Name, Mailing Address and ZIP Code of Payee	Particular of Expenditure	Date (month, day, year)	Amount	Name and Office Sought of Federal Candidate
<b>Gabriele Pitcairn Pendleton</b>	<b>personal accounts</b>	<b>3/23/79</b>	<b>\$300.00</b>	<b>William E. Simon President of the US</b>
		<b>3/26/79</b>	<b>\$300.00</b>	

Complete either Line 6 or Line 7 whichever is appropriate. **EXPENDITURES**

7.

Full Name, Mailing Address and ZIP Code of Payee	Particular of Expenditure	Date (month, day, year)	Amount	Name and Office Sought of Federal Candidate
<b>CLCo, Inc. 1941 North Woodley Arlington, VA 22207</b>	<b>advertisement</b>	<b>3/26/79</b>	<b>\$300.00</b>	<b>William E. Simon President of the US</b>

8. TOTAL CONTRIBUTIONS ..... \$ 600.00

9. TOTAL EXPENDITURES ..... \$ 300.00

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, concert with, or at the request or suggestions of any candidate or any authorized committee or agent of such candidate or authorized committee. Furthermore, these expenditures did not involve the financing of dissemination, distribution, or republication in whole or in part of any campaign materials prepared by the candidate, his campaign committee, or their agent.

*C. C. Clinkscale, III* April 6, 1979  
Signature Date

Subscribed and sworn to before me this 6<sup>TH</sup> day of APRIL, 1979

My Commission expires: March 31, 1982  
NOTARY PUBLIC

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. Section 437g or Section 441j (See reverse side of form).

For further information Contact: Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463  
800-424-9530

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

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REPORT OF INDEPENDENT EXPENDITURES  
 OR CONTRIBUTIONS BY PERSONS

(To be used by an individual or a person other than political committee)

RECEIVED 7(H)  
 FEDERAL ELECTION  
 COMMISSION

79 JUL 6 P2:03

1. (a) Name (in full) <b>Gabriela Pitcairn Pendleton</b>	2. Identification Number <b>None</b>
(b) Address (number and street) <b>Cairnwood, Box 338</b>	3. This is an Independent Expenditure:  <input type="checkbox"/> In support of Federal candidates. <input type="checkbox"/> In opposition to Federal candidates.
(c) City, State and ZIP Code <b>Bryn Athyn, PA 19009</b>	
(d) Principal Place of Business <b>home</b>	(e) Occupation <b>Housewife</b>

4. Type of Report (check appropriate box and complete)

(a)  Amendment for \_\_\_\_\_ (which report) (d)  October 10 Quarterly Report  
 (b)  April 10 Quarterly Report (e)  January 31 Year End Report  
 (c)  July 10 Quarterly Report  
 (f)  Tenth day report preceding \_\_\_\_\_ election on \_\_\_\_\_ in the State of \_\_\_\_\_  
 (primary, general or convention) (date)  
 (g)  Thirtieth day report following \_\_\_\_\_ election on \_\_\_\_\_ in the State of \_\_\_\_\_  
 (primary, general or convention) (date)

5. This report covers the period 4/1/79 through 6/30/79

Complete either Line 6 or Line 7 whichever is appropriate. **CONTRIBUTIONS**

Full Name, Mailing Address and ZIP Code of Payee	Particular of Expenditure	Date (month, day, year)	Amount	Name and Office Sought of Federal Candidate
<b>Independent Campaign to Elect William E. Simon President P. O. Box 28260 Washington, D.C. 20005</b>	<b>Contribution</b>	<b>quarter</b>	<b>\$1,200.00</b>	<b>William E. Simon President</b>

Complete either Line 6 or Line 7 whichever is appropriate. **EXPENDITURES**

Full Name, Mailing Address and ZIP Code of Payee	Particular of Expenditure	Date (month, day, year)	Amount	Name and Office Sought of Federal Candidate

8. TOTAL CONTRIBUTIONS ..... \$ 1,200.00

9. TOTAL EXPENDITURES ..... \$ \_\_\_\_\_

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, concert with, or at the request or suggestions of any candidate or any authorized committee or agent of such candidate or authorized committee. Furthermore, these expenditures did not involve the financing of dissemination, distribution, or republication in whole or in part of any campaign materials prepared by the candidate, his campaign committee, or their agent.

Subscribed and sworn to before me this 29<sup>th</sup> day of June, 1979

My Commission expires: \_\_\_\_\_  
 MY COMMISSION EXPIRES: June 15, 1981  
 NOTARY PUBLIC

G. P. ... June 29, 1979  
 Signature Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. Section 437g or Section 441j (See reverse side of form).

For further information  
 Contact: Federal Election Commission  
 1325 K Street, N.W.  
 Washington, D.C. 20463  
 800-424-9630

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

7903101344773  
 02040344773

Independent Committee to Elect  
William E. Simon President  
777 14th St. N.W. Suite 1300  
Washington, D.C. 20005



6284581479  
Federal Elections Commission  
25 K Street, NW  
Washington, D.C. 20463

RECEIVED  
FEDERAL ELECTION  
COMMISSION



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

(Except for Candidates or Committees Receiving Federal Matching Funds)

RECEIVED  
 FEDERAL ELECTION COMMISSION  
 7(1)  
 62-79

79 JUL 6 P2:03

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

1 Independent Campaign to Elect William E. Simon President I.D. No. None  
 Name of Candidate or Committee (in full) Candidate/Committee  
P.O. Box 20260 President  
 Address (number and street) Office Sought, State/District (if applicable)  
Washington, D.C. 20008  
 City, State and ZIP Code  Check if address is different than previously reported. Year of Election 1980

4 Type of Report (check appropriate boxes)

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

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

5 Covering Period _____ Through _____	Column A This Period	Column B Calendar Year-To-Date
6 Cash on hand January 1, 1979		\$ .00
7 Cash on hand at beginning of reporting period	\$ 300.00	
8 Total receipts (from line 18)	\$ 4,191.00	\$ 4,791.00
(a) Subtotal (Add lines 7 and 8 for Column A and lines 6 and 8 for Column B)	\$ 4,491.00	\$ 4,791.00
9 Total expenditures (from line 25)	\$ 3,474.38	\$ 3,774.38
10 Cash on hand at close of reporting period (Subtract line 9 from line 8a)	\$ 1,016.62	\$ 1,016.62
11 Value of contributed items on hand to be liquidated (Attach itemized list) \$ _____		
12 Debts and obligations owed to the Committee/Candidate (itemize all on Schedule C) . . .	\$ .00	
13 Debts and obligations owed by the Committee/Candidate (itemize all on Schedule C) . . .	\$ .00	

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

June 29, 1979  
 (Date)

C.C. Clinkscales, III  
 (Typed Name of Treasurer or Candidate)

[Signature]  
 (Signature of Treasurer or Candidate)

Note: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. Section 437g, or Section 441j (see reverse side of form).

For further information, Contact:

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

or call 800/424-9630

Approved by GAO  
 S-187820 (R0506)  
 Expires 3-31-81

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

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

79031013581  
 02040344775

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

**NAME OF CANDIDATE OR COMMITTEE**  
 Independent Campaign to Elect William E. Smer President

**REPORT COVERING THE PERIOD**  
 FROM: 4/1/79 TO: 6/30/79

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022040334776

RECEIPTS		Column A This Period	Column B Calendar Year-To-Date
14. Contributions from individuals (including contributions in-kind):			
(a) Itemized (use Schedule A) .....	\$ 3,600.00		
(b) Unitemized .....	\$ 591.00		
(c) Sales and collections included above: List by event on memo Schedule D (S _____ )			
(d) Subtotal of contributions from individuals .....	\$ 4,191.00	\$ 4,791.00	
15. Transfers from Political Committees:			
(a) Funds from affiliated/authorized committees (itemize on Schedule A regardless of amount) .....	\$ .....		
(b) Funds from other committees (itemize on Schedule A regardless of amount) .....	\$ .....		
(c) Contributions in-kind from political committees (itemize on Schedule A regardless of amount) .....	\$ .....		
(d) Subtotal of transfers in and contributions in-kind from political committees .....	\$ .01	\$ .00	
16. Other income:			
(a) Itemized (use Schedule A) .....	\$ .....		
(b) Unitemized .....	\$ .....		
(c) Subtotal of other income .....	\$ .00	\$ .00	
17. Loans and Loan Repayments Received:			
(a) Itemized (use Schedule A) .....	\$ .....		
(b) Unitemized .....	\$ .....		
(c) Subtotal of loans and loan repayments received .....	\$ .00	\$ .00	
18. Refunds, Rebates, Returns of Deposits:			
(a) Itemized (use Schedule A) .....	\$ .....		
(b) Unitemized .....	\$ .....		
(c) Subtotal of refunds, rebates, returns of deposits .....	\$ .00	\$ .00	
19. Total Receipts .....	\$ 4,191.00	\$ 4,791.00	
EXPENDITURES			
20. Operating Expenditures:			
(a) Itemized (use Schedule B) .....	\$ 1,567.36		
(b) Unitemized .....	\$ 20.44		
(c) Subtotal of operating expenditures .....	\$ 1,587.80	\$ 1,387.00	
21. Loans, Loan Repayments, and Contribution Refunds Made:			
(a) Itemized (use Schedule B) .....	\$ .....		
(b) Unitemized .....	\$ .....		
(c) Subtotal of loans and loan repayments made and contribution refunds .....	\$ .00	\$ .00	
22. Transfers Out to Political Committees:			
(a) To affiliated/authorized committee (itemize on Schedule B regardless of amount) .....	\$ .....		
(b) To other committees (itemize on Schedule B regardless of amount) .....	\$ .....		
(c) Contributions in-kind to other committees (itemize on Schedule B regardless of amount) .....	\$ .....		
(d) Subtotal of transfers out .....	\$ .00	\$ .00	
23. Independent Expenditures (use Schedule E) .....	\$ 1,886.58	\$ <del>2,186.58</del> 2,186.58	
24. Coordinated Expenditures Made by Political Committees (2 U.S.C. 441a(d)) (itemize on Schedule F) .....	\$ .00	\$ .00	
25. Total Expenditures .....	\$ 3,474.38	\$ <del>2,386.58</del> 3,774.38	
RECEIPTS AND EXPENDITURES, NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES			
26. Total Receipts (from line 19) .....	\$ 4,191.00		
27. Transfers In (from line 15(a)) .....	\$ .00		
28. Net Receipts (Subtract line 27 from line 26) .....	\$ 4,191.00		
29. Total Expenditures (from line 25) .....	\$ 3,474.38		
30. Transfers Out (from line 22(a)) .....	\$ .00		
31. Net Expenditures (Subtract line 30 from line 29) .....	\$ 3,474.38		



ITEMIZED RECEIPTS

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

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

(Use Separate Schedules for  
 each numbered line)

Name of Candidate or Committee in Full  
**Independent Campaign to Elect William E. Simon President**

Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Gabriele Pitcairn Pendleton Cairwood, Box 338 Bryn Athyn, PA 19009	home	4/16/79	\$300.00 <u>15</u>
	Occupation housewife	4/28/79	\$300.00 <u>15</u>
		5/29/79	\$300.00 <u>15</u>
		6/28/79	\$300.00 <u>15</u>
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed	
		Aggregate Year-To-Date ... \$ 1,800.00	
Willard D. Pendleton 3032 Huntington Pike Bryn Athyn, PA 19009	home	6/14/79	\$1,000.00 <u>15</u>
	Occupation retired bishop		
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed	
		Aggregate Year-To-Date ... \$ 1,000.00	
Lloyd Johnson 3400 Morgan Road Ann Arbor, MI 48104	Principal Place of Business Whitehall Convalescent Homes 3400 Morgan Road Ann Arbor, MI 48104	4/28/79	\$1,000.00 <u>15</u>
	Occupation President of corporation		
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed	
		Aggregate Year-To-Date ... \$ 1,000.00	
Michael & Joan Votto 664 Second Street Pike Southampton, PA 18996	Principal Place of Business	5/25/79	\$400.00 <u>15</u>
	Occupation Self-employed		
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed	
		Aggregate Year-To-Date ... \$ 400.00	
	Principal Place of Business		
	Occupation		
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed	
		Aggregate Year-To-Date ... \$	
	Principal Place of Business		
	Occupation		
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed	
		Aggregate Year-To-Date ... \$	
	Principal Place of Business		
	Occupation		
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed	
		Aggregate Year-To-Date ... \$	
SUBTOTAL of receipts this page (optional) .....			\$ 3,600.00
TOTAL this period (last page this line number only) .....			\$ 4,181.00

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

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02040478

Name of Candidate or Committee in Full <b>Independent Campaign To Elect William E. Simon President</b>			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Postmaster Washington, D.C. Main Post Office Washington, D.C. 20013	500 15c stamps	6/5/79	\$75.00
	Expenditure for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Baumgarten's 925 11th Street, NW Washington, D.C. 20005	Rubber stamp	6/18/79	\$18.38
	Expenditure for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
C. C. Clinkscales, III Suite 1300, 777 14th St., NW Washington, D.C. 20005	Travel expenses to Phil.	4/12/79	\$34.85
	Expenditure for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
C & P Telephone Company 1325 G Street, NW Washington, D.C. 20005	Telephone Billings	4/28/79	27.44
	Expenditure for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	5/23/79	18.14
The Wyatt Building Suite 1300 777 14th Street, NW Washington, D.C. 20005		Office Rent	6/5/79
	6/21/79		9.16
	6/28/79		24.00
	6/28/79		225.00
Printer's Ink 9146 Euclid Court Manassas, VA 22110	Office stationery	5/3/79	\$68.25
		Expenditure for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	
Bond Office Services 8930 Telegraph Road Lorton, VA 22079	Print response notes	6/18/79	\$42.00
Sedam & Herge 7600 Springhouse Road McLean, VA 22101	Legal fees	5/9/79	\$200.00
SUBTOTAL of expenditures this page (optional) . . . . .			\$ 1,567.36
TOTAL this period (last page this line number only) . . . . .			\$ 1,567.36

ITEMIZED INDEPENDENT EXPENDITURES  
 FOR LINE 23, FEC FORM 3

(See Reverse Side for Instructions)

Name of Candidate or Committee in Full <b>Independent Campaign to Elect William E. Simon President</b>	I.D. No. <b>None</b>
Full Name, Mailing Address and ZIP Code <b>Gabriele Fitzcarron Pendleton Box 338, Cairnwood Bryn Athyn, PA 19009</b>	Is this a Separate Report by a Committee filing on FEC Form 3a? <b>YES</b>

Itemize independent expenditures which exceed, in the aggregate, \$100 within a calendar year.

Full Name, Mailing Address & ZIP Code of Each Payer	Particulars of Expenditure	Date (month, day, year)	Amount	Name of Federal Candidate supported or opposed by the expenditure & office sought
<b>CLCo, Inc. 1941 North Woodley St. Arlington, VA 22207</b>	<b>Advertisements</b>	<b>6/2/79</b>	<b>\$832.32</b>	<b>William E. Simon Pres William E. Simon Pres William E. Simon Pres William E. Simon Pres</b>
		<b>6/15/79</b>	<b>316.00</b>	
		<b>6/27/79</b>	<b>91.00</b>	
		<b>6/28/79</b>	<b>441.00</b>	
<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose				
<b>Ellis Graphics 8603 Springvale Rd. Silver Spring, MD 20902</b>	<b>Typesetting</b>	<b>5/16/79</b>	<b>\$15.00</b>	<b>Wm. E. Simon Pres. Wm. E. Simon Pres. Wm. E. Simon Pres.</b>
		<b>6/9/79</b>	<b>\$150 &amp; 3.86</b>	
		<b>6/24/79</b>	<b>\$29.40</b>	
<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose				
<b>The Record Composition Wayne Street Silver Spring, MD 20902</b>	<b>Velox copies of ads</b>	<b>4/6/79</b>	<b>\$17.00</b>	<b>Wm. E. Simon Presiden</b>
<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose				
				<input type="checkbox"/> Support <input type="checkbox"/> Oppose
			<b>A 1895.50</b>	<input type="checkbox"/> Support <input type="checkbox"/> Oppose

(a) SUBTOTAL of Itemized Independent Expenditures . . . . . \$ 1,886.58  
 (b) SUBTOTAL of Unitemized Independent Expenditures . . . . . \$ .00  
 (c) TOTAL Independent Expenditures . . . . . \$ 1,886.58 **248**

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, concert with, or at the request or suggestion of any candidate or any authorized committee or agent of such candidate or authorized committee. Furthermore, these expenditures did not involve the financing of dissemination, distribution, or republication in whole or in part of any campaign materials prepared by the candidate, his campaign committee, or their agent.

G. P. Pendleton Signature    June 29, 1979 Date

Subscribed and sworn to before me this 29<sup>th</sup> day of

June, 1979

My Commission expires:  
 MY COMMISSION EXPIRES  
 JUNE 15, 1981

Philip A. Guarino  
 NOTARY PUBLIC

79031013585  
 02040544779

Independent Committee to Elect  
William E. Simon President  
777 14th St. N.W. Suite 1300  
Washington, D.C. 20005



Federal Elections Commission  
25 K Street, NW  
Washington, D.C. 20463

JUL 9 PM 12:39

RECEIVED  
FEDERAL ELECTION  
COMMISSION

6204034478



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

(Except for Candidates or Committees Receiving Federal Matching Funds)

FEDERAL ELECTION  
 COMMISSION

7(j)

03-77

Note: Committees authorized by a candidate to receive contributions and make expenditures in connection with the campaign must file separate reports with respect to each election.

1 Independent Campaign to Elect William E. Simon President 2 I.D. No. 099001174  
 Name of Candidate or Committee (in full) P. O. Box 28290 Candidate/Committee  
 Address (number and street) Washington, D.C. 20005 3 President  
 City, State and ZIP Code Washington, D.C. 20005 Office Sought, State/District (if applicable)  
 Check if address is different than previously reported. Year of Election 1980

4 Type of Report (check appropriate boxes)

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

July 10 Quarterly Report on \_\_\_\_\_ in the State of \_\_\_\_\_  Amendment for: \_\_\_\_\_

October 10 Quarterly Report  Thirtieth day report following \_\_\_\_\_ election (which report) \_\_\_\_\_

January 31 Annual Report  Monthly Report \_\_\_\_\_ on \_\_\_\_\_ in the State of \_\_\_\_\_ (primary, general or convention)

Monthly Report \_\_\_\_\_ (month) \_\_\_\_\_ (date)

This is a report for  Primary Election  General Election  Primary and General  Other (special, runoff, etc.)

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

5 Covering Period <u>7/1/79</u> Through <u>9/30/79</u>	Column A This Period	Column B Calendar Year-To-Date
6 Cash on hand January 1, 1979		\$ .00
7 Cash on hand at beginning of reporting period	\$ 1,016.62	
8 Total receipts (from line 19)	\$ 13,706.85	\$ 18,497.85
(a) Subtotal (Add lines 7 and 8 for Column A and lines 6 and 8 for Column B)	\$ 14,723.47	\$ 18,497.85
9 Total expenditures (from line 25)	\$ 13,138.39	\$ 16,912.77
10 Cash on hand at close of reporting period (Subtract line 9 from line 8a)	\$ 1,585.08	\$ 1,585.08
11 Value of contributed items on hand to be liquidated (Attach itemized list)	\$ .00	
12 Debts and obligations owed to the Committee/Candidate (itemize all on Schedule C)	\$ .00	
13 Debts and obligations owed by the Committee/Candidate (itemize all on Schedule C)	\$ .00	

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

10/10/79

(Date)

C. C. Clinkscales, III

(Typed Name of Treasurer or Candidate)

[Signature]  
 (Signature of Treasurer or Candidate)

Note: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. Section 437g, or Section 441 (see reverse side of form).

For further information, Contact:

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

or call 800/424-9630

Approved by GAO  
 B-187620 (R0808)  
 Expires 3-31-81

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

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79031023971

**STATEMENT OF RECEIPTS AND EXPENDITURES**  
(Page 2, FEC FORM 3)

**NAME OF CANDIDATE OR COMMITTEE**

Independent Campaign to Elect William E. Simon President

**REPORT COVERING THE PERIOD**

FROM: 7/1/79

TO: 9/30/79

**RECEIPTS**

- 14. Contributions from Individuals (including contributions in-kind):
  - (a) Itemized (use Schedule A) . . . . .
  - (b) Unitemized . . . . .
  - (c) Sales and collections included above:  
List by event on memo Schedule D IS \_\_\_\_\_ 1
  - (d) Subtotal of contributions from individuals . . . . .
- 15. Transfers from Political Committees:
  - (a) Funds from affiliated/authorized committee (itemize on Schedule A regardless of amount) . . . . .
  - (b) Funds from other committee (itemize on Schedule A regardless of amount) . . . . .
  - (c) Contributions in-kind from political committees (itemize on Schedule A regardless of amount) . . . . .
  - (d) Subtotal of transfers in and contributions in-kind from political committees . . . . .
- 16. Other Income:
  - (a) Itemized (use Schedule A) . . . . .
  - (b) Unitemized . . . . .
  - (c) Subtotal of other income . . . . .
- 17. Loans and Loan Repayments Received:
  - (a) Itemized (use Schedule A) . . . . .
  - (b) Unitemized . . . . .
  - (c) Subtotal of loans and loan repayments received . . . . .
- 18. Refunds, Rebates, Returns of Deposits:
  - (a) Itemized (use Schedule A) . . . . .
  - (b) Unitemized . . . . .
  - (c) Subtotal of refunds, rebates, returns of deposits . . . . .
- 19. Total Receipts . . . . .

	Column A This Period	Column B Calendar Year-To-Date
	\$ 7,707.50	
	\$ 2,499.35	
	10,206.85	
	\$	\$ 14,997.85
	\$ .00	
	\$ .00	
	\$ .00	
	\$ .00	\$ .00
	\$ .00	
	\$ .00	
	\$ .00	\$ .00
	\$ 3,500.00	
	\$ .00	
	\$ 3,500.00	\$ 3,500.00
	\$ .00	
	\$ .00	
	\$ .00	\$ .00
	\$ 13,706.85	\$ 18,497.85

**EXPENDITURES**

- 20. Operating Expenditures:
  - (a) Itemized (use Schedule B) . . . . .
  - (b) Unitemized . . . . .
  - (c) Subtotal of operating expenditures . . . . .
- 21. Loans, Loan Repayments, and Contribution Refunds Made:
  - (a) Itemized (use Schedule B) . . . . .
  - (b) Unitemized . . . . .
  - (c) Subtotal of loans and loan repayments made and contribution refunds . . . . .
- 22. Transfers Out to Political Committees:
  - (a) To affiliated/authorized committee (itemize on Schedule B regardless of amount) . . . . .
  - (b) To other committee (itemize on Schedule B regardless of amount) . . . . .
  - (c) Contributions in-kind to other committees (itemize on Schedule B regardless of amount) . . . . .
  - (d) Subtotal of transfers out . . . . .
- 23. Independent Expenditures (use Schedule E) . . . . .
- 24. Coordinated Expenditures Made by Political Committees (2 U.S.C. 441a(d)) (itemize on Schedule F) . . . . .
- 25. Total Expenditures . . . . .

	\$ 12,728.08	
	\$ 410.31	
	\$ 13,138.39	\$ 14,726.19
	\$ .00	
	\$ .00	
	\$ .00	\$ .00
	\$ .00	
	\$ .00	
	\$ .00	\$ 2,186.58
	\$	\$
	\$ 13,138.39	\$ 16,912.77

**RECEIPTS AND EXPENDITURES,  
NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES**

- 26. Total Receipts (from line 19) . . . . .
- 27. Transfers In (from line 15(a)) . . . . .
- 28. Net Receipts (Subtract line 27 from line 26) . . . . .
- 29. Total Expenditures (from line 25) . . . . .
- 30. Transfers Out (from line 22(a)) . . . . .
- 31. Net Expenditures (Subtract line 30 from line 29) . . . . .

	\$ 13,706.85	
	\$ .00	
	\$ 13,706.85	
	\$ 13,138.39	
	\$ .00	
	\$ 3,138.39	

79031023972



January, 1979  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

**EXPENSES**  
Operating Expenses, Transfers Out, Contributions to Fund,  
Loans, Loan Repayments and Refunds Made  
Supporting Lines 20a, 21a, and 22a, 22b, and 22c  
of FEC FORM 3

Line Number \_\_\_\_\_  
Use Separate Schedules for  
each numbered line

79031023973  
03040714783

Name of Candidate or Committee in Full			
<b>Independent Campaign To Elect William E. Simon President</b>			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
National Federation of Republican Women 310 First Street, SE Washington, D.C. 20003	convention booth	9/17/79	\$250.00
	Expenditure for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Skidmore Printing Service 9232-R Warren Street Silver Spring, MD 20910	stationery and envelopes	8/28/79	\$135.20
	Expenditure for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
McLitho Printing Company 5848 Columbia Pike Baileys Crossroads, VA 22041	reprinting of campaign material	9/25/79	\$221.10
		9/5/79	69.30
		9/7/79	145.20
Expenditure for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
C. C. Clinkscales, III Through CLCo, Inc. 1941 North Woodley St. Arlington, VA 22207	Advance Travel expenses	8/20/79	\$200.00
	Expenditure for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Diner's Club P. O. Box 17326 Denver, CO 80217	Car Rental	8/15/79	\$123.44
	Expenditure for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Richard M. McNeil 1165 West Street Road Warminster, PA 18974	Itemized expenses	8/31/79	\$147.64
	Expenditure for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
American Airlines Holiday Inn of Indianapolis Other expenses for National Federation of Rep. Women Conv.	expenses and airfare for staff at Indianapolis convention	9/27/79	\$707.50 in kind payment from Mrs. G. P. Pendleton
	Expenditure for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Bond Office Services 14498 Telegraph Road Woodbridge, VA 22192	Mailing service	8/16/79	\$210.30
	Expenditure for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	9/15/79	91.62
SUBTOTAL of expenditures this page (optional) . . . . .			\$ 2,301.30
TOTAL this period (last page this line number only) . . . . .			\$ 12,728.08



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

(Use Separate Schedule for each numbered line)

79031023974  
 02040314704

Name of Candidate or Committee in Full			
<b>Independent Campaign To Elect William E. Simon President</b>			
Full Name, Mailing Address and ZIP Code Postmaster, Washington, D.C. Mail Post Office Washington, D.C. 20013	Particulars of Expenditure stamps and post office box	Date (month, day, year) 8/8/79	Amount of each expenditure this period \$25.00
	Expenditure for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	8/14/79 8/17/79 8/21/79	56.00 30.00 41.00
Full Name, Mailing Address and ZIP Code Postmaster, Washington, D.C.	Particulars of Expenditure	Date (month, day, year) 9/5/79	Amount of each expenditure this period 10.00
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	9/5/79 9/10/79 9/11/79	69.00 30.00 30.00
Full Name, Mailing Address and ZIP Code C & P Telephone Company 1325 G Street, NW Washington, D.C. 20005	Particulars of Expenditure telephone service and calls	Date (month, day, year) 7/23/79	Amount of each expenditure this period 16.10
	Expenditure for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	8/6/79 8/26/79 9/7/79 & 9/24	12.68 18.28 30.58 & 40.94
Full Name, Mailing Address and ZIP Code The Wyatt Building Suite 1300 777 14th Street, NW Washington, D.C. 20005	Particulars of Expenditure office rent	Date (month, day, year) 7/31/79	Amount of each expenditure this period \$225.00
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	8/31/79	225.00
Full Name, Mailing Address and ZIP Code Ellis Graphics 8603 Springvale Road Silver Spring, MD 20902	Particulars of Expenditure typesetting	Date (month, day, year) 7/19/79	Amount of each expenditure this period 15.00
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	8/20/79 9/5/79	9.80 34.30
Full Name, Mailing Address and ZIP Code CLCo, Inc. 1941 North Woodley Street Arlington, VA 22207	Particulars of Expenditure Advertisements	Date (month, day, year) 8/7/79	Amount of each expenditure this period \$1,900.00
	Expenditure for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	8/13/79 8/27/79 8/31/79	195.00 2,095.00 2,095.00
Full Name, Mailing Address and ZIP Code CLCo, Inc. 1941 North Woodley St. Arlington, VA 22207	Particulars of Expenditure Advertisements	Date (month, day, year) 8/31/79	Amount of each expenditure this period 441.00
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	9/26/79	2,095.00
Full Name, Mailing Address and ZIP Code Warren & Harper Advertising Suite 500 4641 Montgomery Avenue Bethesda, MD 20014	Particulars of Expenditure Buttons and Bumper Stickers	Date (month, day, year) 8/9/79	Amount of each expenditure this period \$251.80
	Expenditure for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	8/13/79	403.30
SUBTOTAL of expenditures this page (optional) . . . . .			\$ 10,426.78
TOTAL this period (last page this line number only) . . . . .			\$

(Contributions, Transfers, Contributions in-Kind,  
Other Income, Loans, Refunds)

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

Name of Candidate or Committee in Full

Independent Campaign To Elect William E. Simon President

Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Gabriela Pitcairn Pendleton Cairnwood, Box 338 Bryn Athyn, PA 19009	home	7/30/79	\$300.00 ✓
	Occupation housewife	8/30/79	300.00 ✓
Receipt for:	<input type="checkbox"/> Check if Contributor is self-employed	9/27/79	707.50 in-kind
	Aggregate Year-To-Date ... \$ 3407.50	9/29/79	300.00 ✓
Mrs. Mabel K. Johnson 3400 Morgan Road Ann Arbor, MI 48104	same	8/14/79	\$500.00 ✓
	Occupation housewife		
Receipt for:	<input type="checkbox"/> Check if Contributor is self-employed		
	Aggregate Year-To-Date ... \$ 500.00		
Mr. James A. Morrison 3920 B 70th Avenue Crt. West Tacoma, WA 98466	United Airlines SEA-TAC Airport, Seattle	8/6/79	\$100.00
	Occupation Airline pilot	8/24/79	50.00
Receipt for:	<input type="checkbox"/> Check if Contributor is self-employed		
	Aggregate Year-To-Date ... \$ 150.00		
Garth Pitcairn 600 Woodward Drive Huntingdon Valley, PA 19006	Pitcairn Volkswagen, Inc. Route 1 Morrisville, Pa 19067	8/13/79	\$1,000.00 ✓
	Occupation Automobile Dealer		
Receipt for:	<input type="checkbox"/> Check if Contributor is self-employed		
	Aggregate Year-To-Date ... \$1,000.00		
Joseph A. Gallagher 1700 Market Street Philadelphia, PA 19103	Industrial Valley Bank Philadelphia, PA	8/27/79	\$200.00 ✓
	Occupation President		
Receipt for:	<input type="checkbox"/> Check if Contributor is self-employed		
	Aggregate Year-To-Date ... \$200.00		
Mrs. Hebe Dick Baldwin 225 South 8th Street Philadelphia, PA 19106	home	8/27/79	\$25.00
	Occupation housewife	9/7/79	975.00 ✓
Receipt for:	<input type="checkbox"/> Check if Contributor is self-employed		
	Aggregate Year-To-Date ... \$1,000		
Mr. Dan Pitner P. O. Box 113 Tupelo, MS 38801	home	8/30/79	\$250.00 ✓
	Occupation		
Receipt for:	<input type="checkbox"/> Check if Contributor is self-employed		
	Aggregate Year-To-Date ... \$ 250.00		
SUBTOTAL of receipts this page (optional) .....			\$ 4,707.50
TOTAL this period (last page this line number only) .....			\$

79031023975  
0204011478

ITEMIZED RECEIPTS

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

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

02893343786

Name of Candidate or Committee in Full			
Independent Campaign To Elect William E. Simon President			
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Mr. Joseph B. Janvrin 253 Crosslands Kennett Square, PA 19348	Retired	9/15/79	\$200.00 ✓
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Occupation		
	<input type="checkbox"/> Check if Contributor is self-employed		
	Aggregate Year-To-Date ... \$200.00		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Mr. Roy Guffey 1116 One Energy Square Dallas, Texas 75206	Roy Guffey Oil Company 1116 One Energy Square Dallas, TX 75206	9/17/79	\$250.00 ✓
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Occupation		
	<input type="checkbox"/> Check if Contributor is self-employed		
	Aggregate Year-To-Date ... \$250.00		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Mr. Jaquelin E. Taylor 213 Ross Building 8th & Main Streets Richmond, VA 23219	Meadowfarm Orange, VA 22960	9/22/79	\$500.00 ✓
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Occupation		
	<input type="checkbox"/> Check if Contributor is self-employed		
	Aggregate Year-To-Date ... \$500.00		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Mrs. St. John Garwood 1802 San Gabriel Street Austin, TX 78701	same	9/26/79	\$500.00 ✓
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Occupation		
	<input type="checkbox"/> Check if Contributor is self-employed		
	Aggregate Year-To-Date ... \$500.00		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Anthony W. Novasitis, Jr. 1004 Robinson Bldg. Philadelphia, PA 19102	1004 Robinson Bldg. Philadelphia, PA 19102	9/29/79	\$200.00 ✓
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Occupation		
	<input type="checkbox"/> Check if Contributor is self-employed		
	Aggregate Year-To-Date ... \$200.00		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Domenick Celentano 48 Windermere Road Upper Montclair, NJ 07043	Celentano 225 Bloomfield Avenue Verona, NJ 07044	6/13/79	\$50.00
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Occupation		
	<input type="checkbox"/> Check if Contributor is self-employed		
	Aggregate Year-To-Date ... \$150.00		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Mrs. Mary C. Rohe Box 305 Hunt, TX 78-24	same	5/21/79	\$100.00
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Occupation		
	<input type="checkbox"/> Check if Contributor is self-employed		
	Aggregate Year-To-Date ... \$200.00		
SUBTOTAL of receipts this page (optional) .....			\$200.00
TOTAL this period (last page this line number only) .....			



January 1980  
 Federal Election Commission  
 1200 K Street, N.W.  
 Washington, D.C. 20543

Contributions, Transfers, Contributions in-Kind,  
 Other Income, Loans, Refunds  
 Supporting Lines 14a, 15a, 15b, 16c, 18a, 17a, and/or 18a  
 of FEC FORM 3

Line Number 24(a)  
 (Use separate schedules for each numbered line)

020983243837

Name of Candidate or Committee in Full Independent Campaign To Elect William E. Simon President			
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Roger Milliken 234 South Fairview Avenue Spartanburg, SC 29304	Milliken & Company Box 3187 Spartanburg, SC 29304 Occupation President	9/24/79	\$1,000.00
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed	
Full Name, Mailing Address and ZIP Code		Aggregate Year-To-Date ... \$ 1,000	
Principal Place of Business		Date (month, day, year)	Amount of each Receipt this Period
Occupation			
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed	
Full Name, Mailing Address and ZIP Code		Aggregate Year-To-Date ... \$	
Principal Place of Business		Date (month, day, year)	Amount of each Receipt this Period
Occupation			
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed	
Full Name, Mailing Address and ZIP Code		Aggregate Year-To-Date ... \$	
Principal Place of Business		Date (month, day, year)	Amount of each Receipt this Period
Occupation			
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed	
Full Name, Mailing Address and ZIP Code		Aggregate Year-To-Date ... \$	
Principal Place of Business		Date (month, day, year)	Amount of each Receipt this Period
Occupation			
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed	
Full Name, Mailing Address and ZIP Code		Aggregate Year-To-Date ... \$	
Principal Place of Business		Date (month, day, year)	Amount of each Receipt this Period
Occupation			
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed	
Full Name, Mailing Address and ZIP Code		Aggregate Year-To-Date ... \$	
Principal Place of Business		Date (month, day, year)	Amount of each Receipt this Period
Occupation			
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed	
Full Name, Mailing Address and ZIP Code		Aggregate Year-To-Date ... \$	
Principal Place of Business		Date (month, day, year)	Amount of each Receipt this Period
Occupation			
SUBTOTAL of receipts this page (optional) .....			\$ 1,000.00
TOTAL this period (last page this line number only) .....			\$ 7,707.50

Supporting Line Numbers 12 and 13  
of FDC FORM 3

Line Number 17(a)(c)  
Also Enclose Schedules for  
each numbered line

(Indicate Primary or General Election for each Entry)

Name of Candidate and Committee in Full

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
Mrs. Gabriella Piteira Rendleton Box 388, "Cairnwood" Bryn Athyn, PA 19009	8/28/79	\$3,500.00	\$ .00	\$3,500.00
<input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other				

NATURE OF OBLIGATION (Details of Debt):  
 financial transfer to pay for magazine ads. To be re-paid by company

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
		\$	\$	\$
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other				

NATURE OF OBLIGATION (Details of Debt):

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
		\$	\$	\$
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other				

NATURE OF OBLIGATION (Details of Debt):

SUBTOTALS this period this page (optional) .....	\$	\$	\$
TOTAL this period (last page this line number only) .....	\$	\$	\$3,500.00

Carry outstanding balance only to appropriate line of summary.

620431047889

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

(Except for Candidates or Committees Receiving Federal Matching Funds)

FEC 7(K)  
Q2 Amend 79  
80 FEB 4 1980

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

1. Independent Campaign To Elect William E. Shaw President  
Name of Candidate or Committee (in full)  
P.O. Box 2829  
Address (number and street)  
Washington, D.C. 20005  
City, State and ZIP Code  
2. I.D. No. 099001174  
Candidate/Committee  
3. PRESIDENT  
Office Sought, State/District (if applicable)  
4. Check if address is different than previously reported.   
Year of Election 1980

4 Type of Report (check appropriate boxes)  
 April 10 Quarterly Report  
 July 10 Quarterly Report  
 October 10 Quarterly Report  
 January 31 Annual Report  
 Monthly Report (month) \_\_\_\_\_ on \_\_\_\_\_ (date) in the State of \_\_\_\_\_  
 Tenth day report preceding \_\_\_\_\_ election (primary, general or convention) on \_\_\_\_\_ in the State of \_\_\_\_\_ (date)  
 Thirtieth day report following \_\_\_\_\_ election (primary, general or convention) on \_\_\_\_\_ in the State of \_\_\_\_\_ (date)  
 Termination Report  
 Amendment for: 3<sup>rd</sup> QUARTER '79 (which report)  
This is a report for  Primary Election  General Election  Primary and General  Other (special, runoff, etc.)

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

5 Covering Period _____ Through _____	Column A This Period	Column B Calendar Year-To-Date
6 Cash on hand January 1, 1979		\$ .00
7 Cash on hand at beginning of reporting period	\$ 4,016.62	
8 Total receipts (from line 19)	\$ 13,781.85	\$ 18,572.85
(a) Subtotal (Add lines 7 and 8 for Column A and lines 6 and 8 for Column B)	\$ 17,798.47	\$ 18,572.85
9 Total expenditures (from line 25)	\$ 13,220.39	\$ 16,995.77
10 Cash on hand at close of reporting period (Subtract line 9 from line 8a)	\$ 4,578.08	\$ 1,577.08
11 Value of contributed items on hand to be liquidated (Attach itemized list)	\$ _____	
12 Debts and obligations owed to the Committee/Candidate (itemize all on Schedule C)	\$ .00	
13 Debts and obligations owed by the Committee/Candidate (itemize all on Schedule C)	\$ 3,500.00	

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.  
1/31/80 (Date) C. C. CLINKSALS, II (Typed Name of Treasurer or Candidate) [Signature] (Signature of Treasurer or Candidate)

Note: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. Section 437g, or Section 441 (see reverse side of form).

For further information, contact: Federal Election Commission, 1325 K Street, N.W., Washington, D.C. 20463 or call 800/424-9630. Approved by GAO 8-187620 (R0806) Expires 3-31-81

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

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

630031250141



**STATEMENT OF RECEIPTS AND EXPENDITURES**  
(Page 2, FEC FORM 3)

**NAME OF CANDIDATE OR COMMITTEE:** *INDEPENDENT CANDIDATE A. ELLIOT WILSON C. STANLEY*      **REPORT COVERING THE PERIOD FROM:** *1 July 77*      **TO:** *30 SEP 77*

**RECEIPTS**

	Column A This Period	Column B Calendar Year-To-Date
<b>14. Contributions from Individuals (including contributions in-kind):</b>		
(a) Itemized (use Schedule A) .....	\$ <i>2,707.50</i>	
(b) Unitemized .....	\$ <i>2,574.35</i>	
(c) Sales and collections included above: List by event on memo Schedule D (B _____)		
(d) Subtotal of contributions from individuals .....	\$ <i>5,281.85</i>	\$ <i>15,072.85</i>
<b>15. Transfers from Political Committees:</b>		
(a) Funds from affiliated/authorized committee (itemize on Schedule A regardless of amount) .....	\$ .....	
(b) Funds from other committees (itemize on Schedule A regardless of amount) .....	\$ .....	
(c) Contributions in-kind from political committees (itemize on Schedule A regardless of amount) .....	\$ .....	
(d) Subtotal of transfers in and contributions in-kind from political committees .....	\$ <i>.00</i>	\$ <i>.00</i>
<b>16. Other Income:</b>		
(a) Itemized (use Schedule A) .....	\$ .....	
(b) Unitemized .....	\$ .....	
(c) Subtotal of other income .....	\$ <i>.00</i>	\$ <i>.00</i>
<b>17. Loans and Loan Repayments Received:</b>		
(a) Itemized (use Schedule A) .....	\$ <i>3,500.00</i>	
(b) Unitemized .....	\$ .....	
(c) Subtotal of loans and loan repayments received .....	\$ <i>3,500.00</i>	\$ <i>3,500.00</i>
<b>18. Refunds, Rebates, Returns of Deposits:</b>		
(a) Itemized (use Schedule A) .....	\$ .....	
(b) Unitemized .....	\$ .....	
(c) Subtotal of refunds, rebates, returns of deposits .....	\$ .....	\$ .....
<b>19. Total Receipts .....</b>	\$ <i>13,781.85</i>	\$ <i>18,572.85</i>

**EXPENDITURES**

<b>20. Operating Expenditures:</b>		
(a) Itemized (use Schedule B) .....	\$ <i>12,698.08</i>	
(b) Unitemized .....	\$ <i>542.31</i>	
(c) Subtotal of operating expenditures .....	\$ <i>13,240.39</i>	\$ <i>14,809.19</i>
<b>21. Loans, Loan Repayments, and Contribution Refunds Made:</b>		
(a) Itemized (use Schedule B) .....	\$ .....	
(b) Unitemized .....	\$ .....	
(c) Subtotal of loans and loan repayments made and contribution refunds .....	\$ <i>.00</i>	\$ <i>.00</i>
<b>22. Transfers Out to Political Committees:</b>		
(a) To affiliated/authorized committee (itemize on Schedule B regardless of amount) .....	\$ .....	
(b) To other committees (itemize on Schedule B regardless of amount) .....	\$ .....	
(c) Contributions in-kind to other committees (itemize on Schedule B regardless of amount) .....	\$ .....	
(d) Subtotal of transfers out .....	\$ <i>.00</i>	\$ <i>.00</i>
<b>23. Independent Expenditures (use Schedule E) .....</b>	\$ <i>.00</i>	\$ <i>2,186.68</i>
<b>24. Coordinated Expenditures Made by Political Committees (2 U.S.C. 441a(d)) (itemize on Schedule F) .....</b>	\$ <i>.00</i>	\$ <i>.00</i>
<b>25. Total Expenditures .....</b>	\$ <i>13,240.39</i>	\$ <i>16,995.77</i>

**RECEIPTS AND EXPENDITURES,  
NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES**

<b>26. Total Receipts (from line 19) .....</b>	\$ <i>13,781.85</i>	
<b>27. Transfers In (from line 15(a)) .....</b>	\$ <i>.00</i>	
<b>28. Net Receipts (Subtract line 27 from line 26) .....</b>	\$ <i>13,781.85</i>	
<b>29. Total Expenditures (from line 25) .....</b>	\$ <i>13,240.39</i>	
<b>30. Transfers Out (from line 22(a)) .....</b>	\$ <i>.00</i>	
<b>31. Net Expenditures (Subtract line 30 from line 29) .....</b>	\$ <i>13,240.39</i>	

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

FEDERAL ELECTION COMMISSION  
 7(L)  
 YE 79

(Except for Candidates or Committees Receiving Federal Matching Funds)

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

1 Democratic Committee To Elect William F. Ryan President  
 Name of Candidate or Committee (in full)  
P.O. Box 2529  
 Address (number and street)  
Washington, D.C. 20005  
 City, State and ZIP Code

2 I.D. No. 099091194 Candidate/Committee

3 President  
 Office Sought, State/District (if applicable)

Check if address is different than previously reported. Year of Election 1980

4 Type of Report (check appropriate boxes)

April 10 Quarterly Report  
 July 10 Quarterly Report  
 October 10 Quarterly Report  
 January 31 Annual Report  
 Monthly Report (month) \_\_\_\_\_ on \_\_\_\_\_ (date) in the State of \_\_\_\_\_

Tenth day report preceding \_\_\_\_\_ election (primary, general or convention)  
 Thirtieth day report following \_\_\_\_\_ election (primary, general or convention)

Termination Report  
 Amendment for: \_\_\_\_\_ (which report)

This is a report for  Primary Election  General Election  Primary and General  Other (special, runoff, etc.)

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

5 Covering Period	Column A This Period	Column B Calendar Year-To-Date
<u>1 October 79</u> Through <u>31 December 79</u>		
6 Cash on hand January 1, 19		\$ .00
7 Cash on hand at beginning of reporting period	\$ 1,577.02	
8 Total receipts (from line 18)	\$ 9,047.47	\$ 27,620.32
(a) Subtotal (Add lines 7 and 8 for Column A and lines 6 and 8 for Column B)	\$ 10,624.55	\$ 27,620.32
9 Total expenditures (from line 25)	\$ 10,615.02	\$ 27,610.79
10 Cash on hand at close of reporting period (Subtract line 9 from line 8a)	\$ 9.53	\$ 9.53
11 Value of contributed items on hand to be liquidated (Attach itemized list)	\$ .00	
12 Debts and obligations owed to the Committee/Candidate (itemize all on Schedule C)	\$ .00	
13 Debts and obligations owed by the Committee/Candidate (itemize all on Schedule C)	\$ 3,500.00	

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

1/21/80  
 (Date)

C.C. Chinkesale, Jr.  
 (Typed Name of Treasurer or Candidate)

[Signature]  
 (Signature of Treasurer or Candidate)

Note: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. Section 437g, or Section 461 (see reverse side of form).

For further information, Contact:



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

or call 800/424-9630

Approved by GAO  
 B-187620 (R0506)  
 Expires 3-31-81

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

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

920031050132



NAME OF CANDIDATE OR COMMITTEE	REPORT COVERING THE PERIOD	
INSPECTOR General To Elnor William E. Davis President	FROM: 1 October 79	TO: 31 December 79
RECEIPTS	Column A This Period	Column B Calendar Year-To-Date
14. Contributions from individuals (including contributions in-kind):		
(a) Itemized (use Schedule A) .....	\$ 5,214.00	
(b) Unitemized .....	\$ 3,833.47	
(c) Sales and collections included above: List by event on memo Schedule D 18 _____		
(d) Subtotal of contributions from individuals .....	\$ 9,047.47	\$ 24,120.32
15. Transfers from Political Committees:		
(a) Funds from affiliated/authorized committee (itemize on Schedule A regardless of amount) .....	\$ .00	
(b) Funds from other committees (itemize on Schedule A regardless of amount) .....	\$ .00	
(c) Contributions in-kind from political committees (itemize on Schedule A regardless of amount) .....	\$ .00	
(d) Subtotal of transfers in and contributions in-kind from political committees .....	\$ .00	\$ .00
16. Other Income:		
(a) Itemized (use Schedule A) .....	\$ .00	
(b) Unitemized .....	\$ .00	
(c) Subtotal of other income .....	\$ .00	\$ .00
17. Loans and Loan Repayments Received:		
(a) Itemized (use Schedule A) .....	\$ .00	
(b) Unitemized .....	\$ .00	
(c) Subtotal of loans and loan repayments received .....	\$ .00	\$ 3,500.00
18. Refunds, Rebates, Returns of Deposits:		
(a) Itemized (use Schedule A) .....	\$ .00	
(b) Unitemized .....	\$ .00	
(c) Subtotal of refunds, rebates, returns of deposits .....	\$ .00	\$ .00
19. Total Receipts .....	\$ 9,047.47	\$ 27,620.32
EXPENDITURES		
20. Operating Expenditures:		
(a) Itemized (use Schedule B) .....	\$ 9,803.16	
(b) Unitemized .....	\$ 8,111.84	
(c) Subtotal of operating expenditures .....	\$ 10,615.02	\$ 25,424.21
Loans, Loan Repayments, and Contribution Refunds Made:		
(a) Itemized (use Schedule B) .....	\$ .00	
(b) Unitemized .....	\$ .00	
(c) Subtotal of loans and loan repayments made and contribution refunds .....	\$ .00	\$ .00
Transfers Out to Political Committees:		
(a) To affiliated/authorized committee (itemize on Schedule B regardless of amount) .....	\$ .00	
(b) To other committees (itemize on Schedule B regardless of amount) .....	\$ .00	
(c) Contributions in-kind to other committees (itemize on Schedule B regardless of amount) .....	\$ .00	
(d) Subtotal of transfers out .....	\$ .00	\$ .00
23. Independent Expenditures (use Schedule E) .....	\$ .00	\$ 2,186.56
24. Coordinated Expenditures Made by Political Committees (2 U.S.C. 441a(d)) (itemize on Schedule F) .....	\$ .00	\$ .00
25. Total Expenditures .....	\$ 10,615.02	\$ 27,610.79
RECEIPTS AND EXPENDITURES, NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES		
26. Total Receipts (from line 19) .....	\$ 9,047.47	
27. Transfers In (from line 15(a)) .....	\$ .00	
28. Net Receipts (Subtract line 27 from line 26) .....	\$ 9,047.47	
29. Total Expenditures (from line 25) .....	\$ 10,615.02	
30. Transfers Out (from line 22(a)) .....	\$ .00	
31. Net Expenditures (Subtract line 30 from line 29) .....	\$ 10,615.02	

93031250133  
 0204033  
 047023



ITEMIZED RECEIPTS

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

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

Name of Candidate or Committee in Full <b>Independent Campaign To Elect William E. Simon President</b>			
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
<b>Gabrielle Pirodin Pondleton</b> Box 220, Cairnwood Bryn Athyn, PA 19009	<b>Housewife</b> Occupation <b>Housewife</b>	10/9/79 10/10/79 10/20/79 11/6/79 11/22/79	\$125.00 (Party In-Kind) 19.00 (Party In-Kind) 200.00 1000.00 200.00 200.00
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$5,441.50		
<b>Walter F. O'Connell</b> 460 Park Avenue New York City, NY 10022	<b>Olin Corp. 460 Park Ave, NYC NY 10022</b> Occupation <b>Chairman, Finance Committee</b>	12/22/79	\$1,000.00
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$1,000.00		
<b>L. William Seldman</b> 300 Park Avenue New York City, NY 10022	<b>Phelps Dodge Corp.</b> Occupation <b>Consultant</b>	11/19/79	\$1,000.00
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$1,100.00		
<b>L. S. Williams</b> 108 Hawthorne Rd. Pittsburgh, PA 15238	<b>PPG Industries</b> Occupation <b>Executive</b>	11/14/79	\$300.00
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$300.00		
<b>Ned Tecker</b> Parks, NE 69041	<b>Same</b> Occupation <b>FARMERS</b>	11/2/79	\$25.00
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$125.00		
<b>Samuel Tamposi</b> 2 Ambuca St. Nashua, NH 03060	<b>Selfemployed</b> Occupation <b>Industrial Developer</b>	10/13/79	\$150.00
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$150.00		
<b>Lawrence W. Rathbun</b> 274 1/2 N. Main St. Concord, NH 03301	<b>Retired</b> Occupation <b>Retired</b>	10/15/79 11/8/79	\$200.00 \$100.00
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$300.00		
SUBTOTAL of receipts this page (optional) .....			\$4,809.00
TOTAL this period (last page this line number only) .....			\$

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FORM NO. 10  
 January, 1979  
 Federal Election Commission  
 1225 K Street, N.W.  
 Washington, D.C. 20543

Supporting Line Numbers 12 and 13  
 of FEC FORM 3  
 (Indicate Primary or General Election for each Entry)

Page 1 of 1 for  
 Line Number 13  
 (Use Separate Schedules for  
 each numbered line)

Name of Candidate and Committee in Full

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
Gabriela Pitarca Rodden CORAUSSE, Box 338 Bryn Athyn, PA 19009	8/28/79	\$3,500.00	\$ .00	\$3,500.00
<input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other				

NATURE OF OBLIGATION (Details of Debt):

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
		\$	\$	\$
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other				

NATURE OF OBLIGATION (Details of Debt):

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
		\$	\$	\$
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other				

NATURE OF OBLIGATION (Details of Debt):

SUBTOTALS this period this page (optional) . . . . .	\$	\$	\$
TOTAL this period (last page this line number only) . . . . .	\$	\$	\$

Carry outstanding balance only to appropriate line of summary.

6 2 0 9 3 4 7 5 6 9



P.O. Box 28290  
Washington, D.C. 20005

FEDERAL ELECTION COMMISSION  
1325 K STREET, N.W.  
WASHINGTON, D.C. 20463

20:2 PM FEB 80

RECEIVED  
FEDERAL ELECTION  
COMMISSION

CERTIFIED  
P13 9196704  
MAIL

**REPORT OF RECEIPTS AND DISBURSEMENTS**  
For a Political Committee Other Than an Authorized Committee

RECEIVED

7(N)

'80 APR 18 PM 12:46

(Summary Page)

**1. Name of Committee (In Full)**

Independent Campaign to Elect William E. Simon President

**Address (Number and Street)**

P. O. Box 28290

**City, State and ZIP Code**

Washington, D.C. 20005

Check if address is different than previously reported.

**2. FEC Identification Number**

099001174

199001174

**3.  This committee qualified as a multicandidate committee during this Reporting Period on \_\_\_\_\_ (date)**

**4. TYPE OF REPORT (check appropriate boxes)**

April 15 Quarterly Report Q1-80

July 15 Quarterly Report

October 15 Quarterly Report

January 31 Year End Report

July 31 Mid Year Report (Non-election Year Only)

Monthly Report for \_\_\_\_\_

Twelfth day report preceding \_\_\_\_\_ (Type of Election) election on \_\_\_\_\_ in the State of \_\_\_\_\_

Thirtieth day report following the General Election on \_\_\_\_\_ in the State of \_\_\_\_\_

Termination Report 3-T-Q1

**(b) Is this Report an Amendment?**  
 YES  NO FFC = Q

**SUMMARY**

**5. Covering Period** 1 January 80 Through 31 March 80

**6. (a) Cash on Hand January 1, 1980** .....

\$ 9.53

**(b) Cash on Hand at Beginning of Reporting Period** .....

\$ 9.53

**(c) Total Receipts (from Line 1B)** .....

\$ 123.63

\$ 123.63

**(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)** .....

\$ 133.16

\$ 133.16

**7. Total Disbursements (from Line 2B)** .....

\$ 132.16

\$ 132.16

**8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))** ..

\$ 1.00

\$ 1.00

**9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)** .....

\$ 1.00

**10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)** .....

\$ 3,500.00

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

For further information, contact:

**C. C. Clinkscales, III**

Type or Print Name of Treasurer

*C. C. Clinkscales, III*  
SIGNATURE OF TREASURER

April 15, 1980

Date

Federal Election Commission  
Toll Free 800-424-9630  
Local 202-623-4088

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. § 437g.

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

FEC FORM 3X (3/80)

8003074503

DETAILED SUMMARY PAGE  
of Receipts and Disbursements  
(Page 2, FEC FORM 3)

'00 APR 18 PM 12:46

Name of Committee (in Full) <i>Independent Campaign to Elect William E. Simon President</i>	Report Covering the Period:	
	From: <i>1 January 80</i>	To: <i>31 March 80</i>
	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
<b>I. RECEIPTS</b>		
<b>11. CONTRIBUTIONS (other than loans) FROM:</b>		
(a) Individuals/Persons Other Than Political Committees (None Entry Unitemized \$ _____)	<i>\$25.00</i>	<i>\$25.00</i>
(b) Political Party Committees	<i>.00</i>	<i>.00</i>
(c) Other Political Committees	<i>.00</i>	<i>.00</i>
(d) The Candidate	<i>.00</i>	<i>.00</i>
(e) TOTAL CONTRIBUTIONS (other than loans) (add 11a, 11b, 11c and 11d)	<i>25.00</i>	<i>25.00</i>
<b>12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES</b>	<i>.00</i>	<i>.00</i>
<b>13. LOANS:</b>		
(a) Made or Guaranteed by the Candidate	<i>.00</i>	<i>.00</i>
(b) All Other Loans	<i>.00</i>	<i>.00</i>
(c) TOTAL LOANS (add 13a and 13b)	<i>.00</i>	<i>.00</i>
<b>14. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)</b>	<i>98.63</i>	<i>98.63</i>
<b>15. OTHER RECEIPTS (Dividends, Interest, etc.)</b>	<i>.00</i>	<i>.00</i>
<b>16. TOTAL RECEIPTS (Add 11a, 12, 13c, 14 and 15)</b>	<i>123.63</i>	<i>123.63</i>
<b>II. DISBURSEMENTS</b>		
<b>17. OPERATING EXPENDITURES</b>	<i>132.16</i>	<i>132.16</i>
<b>18. TRANSFERS TO OTHER AUTHORIZED COMMITTEES</b>	<i>.00</i>	<i>.00</i>
<b>19. LOAN REPAYMENTS:</b>		
(a) Of Loans Made or Guaranteed by the Candidate	<i>.00</i>	<i>.00</i>
(b) Of All Other Loans	<i>.00</i>	<i>.00</i>
(c) TOTAL LOAN REPAYMENTS (add 19a and 19b)	<i>.00</i>	<i>.00</i>
<b>20. REFUNDS OF CONTRIBUTIONS TO:</b>		
(a) Individuals/Persons Other Than Political Committees	<i>.00</i>	<i>.00</i>
(b) Political Party Committees	<i>.00</i>	<i>.00</i>
(c) Other Political Committees	<i>.00</i>	<i>.00</i>
(d) TOTAL CONTRIBUTION REFUNDS (add 20a, 20b and 20c)	<i>.00</i>	<i>.00</i>
<b>21. OTHER DISBURSEMENTS</b>	<i>.00</i>	<i>.00</i>
<b>22. TOTAL DISBURSEMENTS (Add 17, 18, 19c, 20d and 21)</b>	<i>132.16</i>	<i>132.16</i>

**III. CASH SUMMARY**

23. CASH ON HAND AT BEGINNING OF THE REPORTING PERIOD	\$	<u>9.53</u>
24. TOTAL RECEIPTS THIS PERIOD (From Line 16)	\$	<u>123.63</u>
25. SUBTOTAL (Add Line 23 and Line 24)	\$	<u>133.16</u>
26. TOTAL DISBURSEMENTS THIS PERIOD (From Line 22)	\$	<u>132.16</u>
27. CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (Subtract Line 26 from 25)	\$	<u>1.00</u>

8207097758A



SCHEDULE A

ITEMIZED RECEIPTS

Any information copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (If Full)			
Independent Campaign to Elect William E. Simon President			
A. Full Name, Mailing Address and ZIP Code  None	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period  00
	Occupation		
	Aggregate Year-to-Date-\$		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation		
	Aggregate Year-to-Date-\$		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation		
	Aggregate Year-to-Date-\$		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation		
	Aggregate Year-to-Date-\$		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation		
	Aggregate Year-to-Date-\$		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation		
	Aggregate Year-to-Date-\$		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation		
	Aggregate Year-to-Date-\$		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
SUBTOTAL of Receipts This Page (optional)			00
TOTAL This Period (last page this line number only)			00

000369745002

SCHEDULE B

ITEMIZED DISBURSEMENTS

Page 1 of 1  
 LINE NUMBER 17  
 (Use correct schedule(s) for each category of the Detailed Summary Page)

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)

Independent Campaign to Elect William E. Simon President

80031077509

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
M&J Corp 1150 17th Street, NW Washington, DC 20036	Phone Charges Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	1-14-80	9.02
CLCo, Inc. 1941 N. Woodley St Arlington, VA 22207	Prepare FEC Report Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	3-14-80	\$122.63
National Savings & Trust Company 155 E New York Avenue, NW Washington, D.C. 20005	Bank Charge Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	2-6-80	\$.51 (approx.)
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional) .....			\$ 132.16
TOTAL This Period (last page this line number only) .....			\$ 132.16

Name of Committee (if Full)

A. Full Name, Mailing Address and ZIP Code of Loan Source Mrs. Gabriella Piteasin Pendleton Box 281 Bryn Athyn, PA 19003 Election: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Original Amount of Loan \$3,500.00	Cumulative Payment To Date .00	Balance Outstanding at Close of This Period \$3,500.00
---	---------------------------------------	-----------------------------------	---

Terms: Date Incurred \_\_\_\_\_ Date Due \_\_\_\_\_ Interest Rate \_\_\_\_\_ % (apr)  Secured

List All Endorsers or Guarantors (if any) to Item A

1. Full Name, Mailing Address and ZIP Code  None	Name of Employer  Occupation  Amount Guaranteed Outstanding: \$	[Shaded Area]
2. Full Name, Mailing Address and ZIP Code	Name of Employer  Occupation  Amount Guaranteed Outstanding: \$	
3. Full Name, Mailing Address and ZIP Code	Name of Employer  Occupation  Amount Guaranteed Outstanding: \$	

B. Full Name, Mailing Address and ZIP Code of Loan Source   Election: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Original Amount of Loan	Cumulative Payment To Date	Balance Outstanding at Close of This Period
--	-------------------------	----------------------------	---

Terms: Date Incurred \_\_\_\_\_ Date Due \_\_\_\_\_ Interest Rate \_\_\_\_\_ % (apr)  Secured

List All Endorsers or Guarantors (if any) to Item B

1. Full Name, Mailing Address and ZIP Code	Name of Employer  Occupation  Amount Guaranteed Outstanding: \$	[Shaded Area]
2. Full Name, Mailing Address and ZIP Code	Name of Employer  Occupation  Amount Guaranteed Outstanding: \$	
3. Full Name, Mailing Address and ZIP Code	Name of Employer  Occupation  Amount Guaranteed Outstanding: \$	

SUBTOTALS This Period This Page (optional) .....

TOTALS This Period (last page in this line only) .....

Carry outstanding balance only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.

70872002000



**SCHEDULE D**  
 (Part of Form 1041)

**DEBTS AND OBLIGATIONS**  
 Excluding Loans

Page **1** of **1**  
 (Use separate Schedule for each separate line)

Name of Corporation (or Full Name of Debtor or Creditor)	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payments This Period	Outstanding Balance at Close of This Period
Independent Company to Elect William E. Simon President  <b>A. Full Name, Mailing Address and Zip Code of Debtor or Creditor</b>  <u>None</u>				
Nature of Debt (Purpose):				
<b>B. Full Name, Mailing Address and Zip Code of Debtor or Creditor</b>  				
Nature of Debt (Purpose):				
<b>C. Full Name, Mailing Address and Zip Code of Debtor or Creditor</b>  				
Nature of Debt (Purpose):				
<b>D. Full Name, Mailing Address and Zip Code of Debtor or Creditor</b>  				
Nature of Debt (Purpose):				
<b>E. Full Name, Mailing Address and Zip Code of Debtor or Creditor</b>  				
Nature of Debt (Purpose):				
<b>F. Full Name, Mailing Address and Zip Code of Debtor or Creditor</b>  				
Nature of Debt (Purpose):				
1) SUBTOTALS This Period This Page (optional) .....				
2) TOTAL This Period (last page this line only) .....				
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only) .....				
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only) .....				

02030974599

ITEMIZED INDEPENDENT EXPENDITURES

See Reverse Side for Instructions

Name of Committee (in Full)				I.D. No.	
Independent Campaign to Elect William E. Simon				099000174	
Full Name, Mailing Address & ZIP Code of Each Payor	Purpose of Expenditure	Date (month, day, year)	Amount	Name of Federal Candidate supported or opposed by the expenditure & office sought	
None			1.00	<input type="checkbox"/> Support	<input type="checkbox"/> Oppose
				<input type="checkbox"/> Support	<input type="checkbox"/> Oppose
				<input type="checkbox"/> Support	<input type="checkbox"/> Oppose
				<input type="checkbox"/> Support	<input type="checkbox"/> Oppose
				<input type="checkbox"/> Support	<input type="checkbox"/> Oppose
				<input type="checkbox"/> Support	<input type="checkbox"/> Oppose
				<input type="checkbox"/> Support	<input type="checkbox"/> Oppose
(a) SUBTOTAL of Itemized Independent Expenditures			\$ .00		
(b) SUBTOTAL of Unitemized Independent Expenditures			\$ .00		
(c) TOTAL Independent Expenditures			\$ .00		

48 20 07 43 01 30 7 45 85 09 69

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, concert with, or at the request or suggestion of any candidate or any authorized committee or agent of such candidate or authorized committee. Furthermore, these expenditures did not involve the financing of dissemination, distribution, or republication in whole or in part of any campaign materials prepared by the candidate, his campaign committee, or their agent.

Subscribed and sworn to before me this \_\_\_\_\_ day of \_\_\_\_\_, 19\_\_\_\_

My Commission expires \_\_\_\_\_

Signature \_\_\_\_\_ Date \_\_\_\_\_

NOTARY PUBLIC

**REPORT OF RECEIPTS AND DISBURSEMENTS**  
For a Political Committee Other Than an Authorized Committee

(Summary Page)

RECEIVED 7(N)

80 APR 12 P12: 57

1. Name of Committee (in Full)  
**INDEPENDENT COMMITTEE TO ELECT WILLIAM E. SIMON PRESIDENT**

Address (Number and Street)  
**POST OFFICE BOX "S"**

City, State and ZIP Code  
**BRYN ATHYN, PENNSYLVANIA, 19009**

Check if address is different than previously reported.

2. FEC Identification Number  
**C99001174**

3.  This committee qualified as a multicandidate committee during this Reporting Period on \_\_\_\_\_ (date)

4. TYPE OF REPORT (check appropriate boxes)

(a)  April 15 Quarterly Report Q1 '80

July 15 Quarterly Report

October 15 Quarterly Report

January 31 Year End Report

July 31 Mid Year Report (Non-election Year Only)

Monthly Report for \_\_\_\_\_

Twelfth day report preceding \_\_\_\_\_ (Type of Election) election on \_\_\_\_\_ in the State of \_\_\_\_\_

Thirtieth day report following the General Election on \_\_\_\_\_ in the State of \_\_\_\_\_

Termination Report

(b) Is this Report an Amendment?  
 YES  NO

800710728A

SUMMARY		Column A This Period	Column B Calendar Year-to-Date
5. Covering Period	<b>DEC 11, 1979 Through MAR 31, 1980</b>		
6. (a) Cash on Hand January 1, 19 <b>80</b>			\$ 0
(b) Cash on Hand at Beginning of Reporting Period		\$ 0	
(c) Total Receipts (from Line 18)		\$ 5143.00	\$ 5143.00
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)		\$ 5143.00	\$ 5143.00
7. Total Disbursements (from Line 28)		\$ 4754.19	\$ 4754.19
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))		\$ 388.81	\$ 388.81
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)		\$ 0	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)		\$ 824.34	

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

For further information, contact:

**G. MORGAN JONES III**  
Type or Print Name of Treasurer

Federal Election Commission  
Toll Free 800-424-9530  
Local 202-623-4068

**G. Morgan Jones III**  
SIGNATURE OF TREASURER

**4.8.80**  
Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

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

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**DETAILED SUMMARY PAGE  
of Receipts and Disbursements  
(Page 2, FEC FORM 3X)**

Name of Committee (in Full)  
**INDEPENDENT COMMITTEE TO ELECT  
WILLIAM E. SIMON, PRESIDENT**

Report Covering the Period:

From: To:

**I. RECEIPTS**

**11. CONTRIBUTIONS (other than loans) FROM:**

(a) Individuals/Persons Other Than Political Committees

(Name Entry Unrevised \$ \_\_\_\_\_)

(b) Political Party Committees

(c) Other Political Committees

(d) TOTAL CONTRIBUTIONS (other than loans) (add 11a, 11b and 11c)

**12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES**

**13. ALL LOANS RECEIVED**

**14. LOAN REPAYMENTS RECEIVED**

**15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Receipts, etc.)**

**16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES**

**17. OTHER RECEIPTS (Dividends, Interest, etc.)**

**18. TOTAL RECEIPTS (Add 11d, 12, 13, 14, 15, 16 and 17)**

**II. DISBURSEMENTS**

**19. OPERATING EXPENDITURES**

**20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES**

**21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES**

**22. INDEPENDENT EXPENDITURES (Use Schedule E)**

**23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. §441a(d)) (Use Schedule F)**

**24. LOAN REPAYMENTS MADE**

**25. LOANS MADE**

**26. REFUNDS OF CONTRIBUTIONS TO:**

(a) Individuals/Persons Other Than Political Committees

(b) Political Party Committees

(c) Other Political Committees

(d) TOTAL CONTRIBUTION REFUNDS (add 26a, 26b and 26c)

**27. OTHER DISBURSEMENTS**

**28. TOTAL DISBURSEMENTS (Add Lines 19, 20, 21, 22, 23, 24, 25, 26d and 27)**

**III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES**

**29. TOTAL CONTRIBUTIONS (other than loans) from Line 11d**

**30. TOTAL CONTRIBUTION REFUNDS from Line 26d**

**31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from Line 29)**

**32. TOTAL OPERATING EXPENDITURES from Line 19**

**33. OFFSETS TO OPERATING EXPENDITURES from Line 15**

**34. NET OPERATING EXPENDITURES (subtract Line 33 from Line 32)**

	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
11. CONTRIBUTIONS (other than loans) FROM:		
(a) Individuals/Persons Other Than Political Committees	5143.00	5143.00
(b) Political Party Committees	0	0
(c) Other Political Committees	0	0
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11a, 11b and 11c)	5143.00	5143.00
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES	0	0
13. ALL LOANS RECEIVED	0	0
14. LOAN REPAYMENTS RECEIVED	0	0
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Receipts, etc.)	0	0
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	0	0
17. OTHER RECEIPTS (Dividends, Interest, etc.)	0	0
18. TOTAL RECEIPTS (Add 11d, 12, 13, 14, 15, 16 and 17)	5143.00	5143.00
<b>II. DISBURSEMENTS</b>		
19. OPERATING EXPENDITURES	4754.19	4754.19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES	0	0
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	0	0
22. INDEPENDENT EXPENDITURES (Use Schedule E)	0	0
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. §441a(d)) (Use Schedule F)	0	0
24. LOAN REPAYMENTS MADE	0	0
25. LOANS MADE	0	0
26. REFUNDS OF CONTRIBUTIONS TO:		
(a) Individuals/Persons Other Than Political Committees	0	0
(b) Political Party Committees	0	0
(c) Other Political Committees	0	0
(d) TOTAL CONTRIBUTION REFUNDS (add 26a, 26b and 26c)	0	0
27. OTHER DISBURSEMENTS	0	0
28. TOTAL DISBURSEMENTS (Add Lines 19, 20, 21, 22, 23, 24, 25, 26d and 27)	4754.19	4754.19
<b>III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES</b>		
29. TOTAL CONTRIBUTIONS (other than loans) from Line 11d	5143.00	5143.00
30. TOTAL CONTRIBUTION REFUNDS from Line 26d	0	0
31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from Line 29)	5143.00	5143.00
32. TOTAL OPERATING EXPENDITURES from Line 19	4754.19	4754.19
33. OFFSETS TO OPERATING EXPENDITURES from Line 15	0	0
34. NET OPERATING EXPENDITURES (subtract Line 33 from Line 32)	4754.19	4754.19

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SCHEDULE A

ITEMIZED RECEIPTS

Page 1 of 3 cc  
 Also attach statement for each category of the Covered Summary Page

Any information copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)  
**INDEPENDENT COMMITTEE TO ELECT WILLIAM E. SIMON, PRESIDENT.**

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
<b>GABRIELE P. FENDLETON</b> 6th FLOOR JENKINTOWN PLAZA JENKINTOWN, PENNSYLVANIA, 19046	<b>NONE</b>	<b>12-13-79</b>	<b>1000.00</b>
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation: <b>HOUSEWIFE</b>	Aggregate Year-to-Date-S: <b>1000.00</b>	
<b>JERRY D. EASTMAN</b> Box 533 HAMPSTEAD N-H 03841	<b>EASTERN AIRLINES</b>	<b>12/13/79</b>	<b>25.00</b>
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation: <b>PILOT</b>	Aggregate Year-to-Date-S: <b>25.00</b>	
<b>RICHARD CABELL</b> RFD #1 BOX 136 CENTER HARBOR N.H. 03226	<b>RETIRED.</b>	<b>12/13/79</b>	<b>25.00</b>
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation: <b>UNKNOWN</b>	Aggregate Year-to-Date-S: <b>25.00</b>	
<b>JOHN K. SKELTON</b> P.O. BOX 934 WOLFEBORO N.H. 03894	<b>N/A</b>	<b>12/13/79</b>	<b>25.00</b>
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation: <b>UNKNOWN</b>	Aggregate Year-to-Date-S: <b>25.00</b>	
<b>GABRIELE P. FENDLETON</b> 5th FLOOR JENKINTOWN PLAZA JENKINTOWN, PENNSYLVANIA, 19046	<b>NONE</b>	<b>1-23-80</b>	<b>300.00</b>
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation: <b>HOUSEWIFE</b>	Aggregate Year-to-Date-S: <b>1300.00</b>	
<b>CATHLEEN BUANS ELMER</b> RFD CAMPTON THORNTON N.H. 03223	<b>UNKNOWN</b>	<b>1-23-80</b>	<b>25.00</b>
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation:	Aggregate Year-to-Date-S: <b>25.00</b>	
<b>ROBERT W. THURSTON</b> NEW LONDON N.H. 03257	<b>UNKNOWN</b>	<b>1-23-80</b>	<b>3.00</b>
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation:	Aggregate Year-to-Date-S: <b>9.00</b>	

SUBTOTAL of Receipts This Page (optional) ..... **1403.00**

TOTAL This Period (last page this line number only) .....

682004301301742820196



SCHEDULE A

ITEMIZED RECEIPTS

2032  
 Line number for each category of the Detailed Summary Page

Any information copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full): **INDEPENDENT COMMITTEE TO ELECT WILLIAM E SIMON, PRESIDENT**

A. Full Name, Mailing Address and ZIP Code <b>MARGTHA F. KENNEDY</b> <b>1105 SPAULE STREET</b> <b>PHILADELPHIA, PA. 19103</b>	Name of Employer <b>TEMPLE UNIVERSITY</b>	Date (month, day, year) <b>1-23-80</b>	Amount of Each Receipt This Period <b>25.00</b>
	Occupation <b>SECRETARY</b>	Aggregate Year-to-Date-\$	
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			

B. Full Name, Mailing Address and ZIP Code <b>FRANK A. MORRISON</b> <b>RD. 1</b> <b>NEW MARKET NH 03857</b>	Name of Employer <b>UNKNOWN</b>	Date (month, day, year) <b>1.23.80</b>	Amount of Each Receipt This Period <b>10.00</b>
	Occupation <b>UNKNOWN</b>	Aggregate Year-to-Date-\$ <b>10.00</b>	
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			

C. Full Name, Mailing Address and ZIP Code <b>JOSEPH A. GALLAGHER</b> <b>VALLEY ASSOCIATES PUBLIC AFFAIRS COMMITTEE</b> <b>JENKINTOWN PA 19046</b>	Name of Employer <b>I.V. BANK</b>	Date (month, day, year) <b>1-23-80</b>	Amount of Each Receipt This Period <del><b>250.00</b></del>
	Occupation <b>BANKER</b>	Aggregate Year-to-Date-\$ <b>250.00</b>	
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			

D. Full Name, Mailing Address and ZIP Code <del><b>GABRIELE P. PENOLETON</b></del> <del><b>6th FLOOR JENKINTOWN PLAZA</b></del> <del><b>JENKINTOWN, PA 19046</b></del>	Name of Employer <b>NONE</b>	Date (month, day, year) <b>2-12-80</b>	Amount of Each Receipt This Period <del><b>300.00</b></del>
	Occupation <b>HOUSEWIFE</b>	Aggregate Year-to-Date-\$ <b>1600.00</b>	
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			

E. Full Name, Mailing Address and ZIP Code <b>GERALD A. DYNALLO</b> <b>160 OVERLOOK AVENUE</b> <b>HACKENSACK, N.J. 07601</b>	Name of Employer <b>UNKNOWN</b>	Date (month, day, year) <b>2-25-80</b>	Amount of Each Receipt This Period <b>5.00</b>
	Occupation <b>UNKNOWN</b>	Aggregate Year-to-Date-\$ <b>5.00</b>	
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			

F. Full Name, Mailing Address and ZIP Code <b>CHARLES J. ANDERSON</b> <b>50 DELAWARE MANAGEMENT CO.</b> <b>NO 7 PENN CENTER PLAZA</b> <b>PHILADELPHIA, PA 19103</b>	Name of Employer <b>DELAWARE MANAGEMENT CO.</b>	Date (month, day, year) <b>2-25-80</b>	Amount of Each Receipt This Period <b>50.00</b>
	Occupation <b>INV. MGMT.</b>	Aggregate Year-to-Date-\$ <b>50.00</b>	
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			

G. Full Name, Mailing Address and ZIP Code <del><b>GABRIELE P. PENOLETON</b></del> <del><b>6th FLOOR JENKINTOWN PLAZA</b></del> <del><b>JENKINTOWN PA 19046</b></del>	Name of Employer <b>NONE</b>	Date (month, day, year) <b>2-25-80</b>	Amount of Each Receipt This Period <del><b>2000.00</b></del>
	Occupation <b>HOUSEWIFE</b>	Aggregate Year-to-Date-\$ <b>3600.00</b>	
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			

SUBTOTAL of Receipts This Page (optional) ..... **2640.00**

TOTAL This Period (last page this line number only) .....

08003107A22P7



SCHEDULE A

ITEMIZED RECEIPTS

Page 2 of 2  
 Also attach schedule(s) for each category of the Detailed Summary Page

Any information copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)  
 INDEPENDENT COMMITTEE TO ELECT WILLIAM E. SMITH SEN

A. Full Name, Mailing Address and ZIP Code 1001 SPAINMEYER LANE PHILADELPHIA, PA 19115	Name of Employer SPAINMEYER LANE	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation		
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$ 430.00		

B. Full Name, Mailing Address and ZIP Code 6th FLOOR JENKINTOWN PIZZA JENKINTOWN, PA 19046	Name of Employer JENKINTOWN PIZZA	Date (month, day, year) 3-6-80	Amount of Each Receipt This Period 500.00
	Occupation		
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$ 390.00		

C. Full Name, Mailing Address and ZIP Code GABRIELE P. FENDLETON 6th FLOOR JENKINTOWN PIZZA JENKINTOWN, PA 19046	Name of Employer JENKINTOWN PIZZA	Date (month, day, year) 5-29-80	Amount of Each Receipt This Period 25.00
	Occupation		
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$		

D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$		

E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$		

F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$		

G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$		

SUBTOTAL of Receipts This Page (optional) ..... 1100.00  
 TOTAL This Period (last page this line number only) ..... 5112.00

0204313072218

SCHEDULE B

ITEMIZED DISBURSEMENTS

Page 1 of 4  
 Line 1000000  
 This amount scheduled for each  
 category of the Detailed  
 Summary Page

Any information copied from such reports and disbursements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)  
 INDEPENDENT COMMITTEE TO ELECT MICHAEL D. SMITH FOR GOV

0209315072229

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
SIR SPEEDY 15 PLEASANT STREET WINDSOR NH 03301	TRAVEL EXPENSE Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	12-11-79	15.25
FURFORD TRAVEL INC 121 N. MAIN ST GREENSBORO N.H. 03301	TRAVEL EXPENSE Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	12-12-79	55.00
NEW ENGLAND TELEPHONE PO BOX 9000 FARMINGTON NH 03109	TELEPHONE EXPENSE Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	12-12-79	225.00
PAUL C. HIGGINS ROUTE 2 BOX 34 MARTIN, VA, 23958	TRAVEL EXPENSE REIMBURSEMENT Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	12-13-79	227.50
G. MORGAN JONES 761 PETERS HILL ROAD MARTIN VA 23958	TRAVEL EXPENSE REIMBURSEMENT Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	1-1-80	503.00
POSTMASTER BAYN ATHVN, NH 03001	POST EXPENSE Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	1-15-80	3.95
MICHAEL SMITH FOR GOV 100 SOUTH MAIN ST GREENSBORO NH 03301	PRINTING Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	1-22-80	13.15
WINCHESTER HILLY WINCHESTER NH WILLOW GROVE RD, 1709	TRAVEL EXPENSE Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	1-22-80	23.50
G. MORGAN JONES 761 PETERS HILL RD MARTIN VA 23958	TRAVEL EXPENSE REIMBURSEMENT Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	1-28-80	205.00
SUBTOTAL of Disbursements This Page (optional)			1177.91
TOTAL This Period (last page this line number only)			

SCHEDULE B

ITEMIZED DISBURSEMENTS

Any information copied from such Returns and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)  
INDEPENDENT COMMITTEE

08003B973220

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
MRS EVELYN LEHR 5271 HOUSE HATBORO PA	FLAGS Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	1-29-80	35.00
B. Full Name, Mailing Address and ZIP Code BELL TELEPHONE OF PA BOX 280 HATBORO HOCKEN, PA, 19429	Purpose of Disbursement TELEPHONE Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	1-31-80	93.87
C. Full Name, Mailing Address and ZIP Code BELL TELEPHONE OF PA BOX 280 HATBORO HOCKEN PA, 19429	Purpose of Disbursement TELEPHONE Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	2-6-80	34.73
D. Full Name, Mailing Address and ZIP Code MORGAN STATUERY CO. 35 S. YORK RD HATBORO PA 19040	Purpose of Disbursement STATUERY Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	2-9-80	17.17
E. Full Name, Mailing Address and ZIP Code GETTY DIRECT MAIL 2544 HUNTINGDON PIKE HUNTINGDON VALLEY PA, 17006	Purpose of Disbursement TYPING EXPENSE Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	2-15-80	72.00
F. Full Name, Mailing Address and ZIP Code OILARD PRINTING BOX 180 SOUTHAMPTON PA, 18966	Purpose of Disbursement PRINTING EXPENSE Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	2-14-80	40.81
G. Full Name, Mailing Address and ZIP Code MORGAN PRINTING CO 40 S YORK RD. HATBORO PA 19040	Purpose of Disbursement PRINTING EXPENSE Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	2-18-80	135.68
H. Full Name, Mailing Address and ZIP Code POSTMASTER EVELYN ATHYN, PA, 19007	Purpose of Disbursement POSTAGE Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	2-20-80	300.00
I. Full Name, Mailing Address and ZIP Code POSTMASTER EVELYN ATHYN, PA, 19007	Purpose of Disbursement POSTAGE Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	2-21-80	152.27
SUBTOTAL of Disbursements This Page (optional) .....			877.53
TOTAL This Period (last page this line number only) .....			



SCHEDULE B

ITEMIZED DISBURSEMENTS

Page 34 of 7  
 Line Number 7  
 (Use separate schedule for each category of the Detailed Summary Page)

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Name of Committee (in Full)  
**INDEPENDENT COMMITTEE TO ELECT MICHAEL DUKAKIS AS GOV. OF MASS.**

0 2 0 0 1 3 1 5 0 1 7 2 2 1

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
OILARD PRINTING CO BOX 186 SOUTHAMPTON PA 19386	PRINTING EXP. Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	2-21-80	127.20
G. MORGAN JONES 761 FETTERS MILL RD HUNTINGDON VALLEY PA 17032	TRAVEL EXPENSE REIMBURSEMENT Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	2-22-80	200.00
MRS F.A. RICHARDSON 27 WARREN STREET CONCORD N.H. 03301	ROOM RENTAL EXPENSE Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	2-25-80	25.00
G. MORGAN JONES 761 FETTERS MILL RD HUNTINGDON VALLEY PA 17032	TRAVEL EXPENSE REIMBURSEMENT Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	2-26-80	150.00
RADIO SHACK N. MAIN STREET CONCORD N.H. 03301	RECORDING TAPE Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	2-23-80	123.13
KNOLL CREST GARDENS CONCORD N.H. 03301	FLOWERS Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	2-23-80	72.00
POSTMASTER BRYN ATHYN, PA 19009	POSTAGE Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	2-29-80	24.03
OILARD STATIONARY CO BOX 186 SOUTHAMPTON PA 19386	STATIONARY SUPPLIES EXPENSE Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	2-29-80	33.35
G. MORGAN JONES 761 FETTERS MILL RD HUNTINGDON VALLEY PA 17032	TRAVEL EXPENSE REIMBURSEMENT Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	3-4-80	100.00
SUBTOTAL of Disbursements This Page (optional)			1704.71
TOTAL This Period (last page this line number only)			

SCHEDULE B

ITEMIZED DISBURSEMENTS

Page 4 of 4 for  
 LINE NUMBER 11  
 Also amounts scheduled for each  
 category of the Detailed  
 Summary Page

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Name of Committee (in Full)  
**INDEPENDENT COMMITTEE TO ELECT WILKINSON F. SHERMAN**

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A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
S. MORGAN JONES 761 FETTERS MILL RD HOUSTINGOOD VALLEY PA, 17036	TRAVEL EXPENSE REIMBURSEMENT	8-4-80	500.00
	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
MORGAN PRINTING CO 40 S YORK ROAD HATBORO PA 17040	PRINTING	8-11-80	57.99
	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
MORGAN STATIONERY 35 S. YORK RD HATBORO PA 17040	STATIONERY	3-26-80	6.57
	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
BELL TELEPHONE CO. BOX 280 HATBORO PA 17040	TELEPHONE EXPENSE	8-24-80	129.66
	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
ANDERSON NATIONAL BANK MAIN STREET HATBORO PA 17040	BANKING	8-27-80	7.00
	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
SUBTOTAL of Disbursements This Page (optional) .....			7103.24
TOTAL This Period (last page this line number only) .....			4754.19

SCHEDULE D  
(Revised 2/80)

DEBTS AND DELIBERATIONS  
Including Loans

Page 1 of 2 for  
Line Number 11  
This amount schedules  
for each numbered line

08063KUM223

Name of Creditor (in Full)	Outstanding Balance Beginning This Period	Amount Received This Period	Payments This Period	Outstanding Balance at Close of This Period
INDUSTRY CREDIT COMPANY 11 FLEET STREET NEW ENGLAND TELEPHONE 120. BOX 9000 MANCHESTER N.H. 03107		75.57		175.57
Nature of Debt (Purpose): TELEPHONE EXPENSE				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor NEW ENGLAND 120 BOX 5000 MANCHESTER NH 03107		103.31		113.31
Nature of Debt (Purpose): TELEPHONE EXPENSE				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor CONCORD MONITOR 3. N. STATE STREET CONCORD NH. 03301	6.16			5.16
Nature of Debt (Purpose): NEWSPAPER EXPENSE				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor MONITOR PUBLISHING CO 20 STATE STREET CONCORD N.H. 03301	15.00			15.00
Nature of Debt (Purpose): NEWSPAPER EXPENSE				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor BERKLEY PUBLISHING CO 1050 WALL STREET WEST. LYNDHURST N.J. 07071	19.78			19.78
Nature of Debt (Purpose): FREIGHT EXPENSE				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor BERKLEY PUBLISHING CO 1050 WALL STREET WEST LYNDHURST N.J. 07071	528.40			528.40
Nature of Debt (Purpose): PURCHASE OF BOOKS				
1) SUBTOTALS This Period This Page (optional) .....				112.11
2) TOTAL This Period (last page this line only) .....				
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only) .....				
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only) .....				



**SCHEDULE D**  
**(Required Form)**

**DEBTS AND DELINQUENCIES**  
**Excluding Loans**

File this schedule for each mortgage held

Name of Debtor (in Full)	Outstanding Balance Beginning This Period	Amount Received This Period	Payments This Period	Outstanding Balance at Close of This Period
INDEPENDENT COMMITTEE TO ELECT WILLIAM S. JAMES				
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
CELL TELEPHONE CO BOX 223 CONSHOHOCKEN, PA. 19029		15.12		15.12
Nature of Debt (Purpose):				
TELEPHONE EXPENSE				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
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) .....				15.12
2) TOTAL This Period (last page this line only) .....				824.34
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only) .....				0
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only) .....				824.34

6 82 00 04 30 13 01 74 28 21 27 4

REPORT OF RECEIPTS AND DISBURSEMENTS  
For a Political Committee Other Than an Authorized Committee

RECEIVED  
'80 JUL 16 PA 12 7(0)

C99001174  
INDEPENDENT COMMITTEE TO ELECT WILLIAM  
E SIMON PRESIDENT

PO BOX S  
BRYN ATHYN PA 19009

City, State and ZIP Code

Check if address is different than previously reported.

2. FEC Identification Number  
C99001174

3.  This committee qualified as a multicandidate committee during this Reporting Period on \_\_\_\_\_ (date)

4. TYPE OF REPORT (check appropriate boxes)

- (a)  April 15 Quarterly Report  
 July 15 Quarterly Report  
 October 15 Quarterly Report  
 January 31 Year End Report  
 July 31 Mid Year Report (Non-election Year Only)  
 Monthly Report for \_\_\_\_\_  
 Twelfth day report preceding \_\_\_\_\_ (Type of Election) election on \_\_\_\_\_ in the State of \_\_\_\_\_  
 Thirtieth day report following the General Election on \_\_\_\_\_ in the State of \_\_\_\_\_  
 Termination Report

(b) Is this Report an Amendment?  
 YES  NO

SUMMARY

5. Covering Period: APRIL 1 1980 Through JUNE 30 1980

	Column A This Period	Column B Calendar Year-to-Date
6. (a) Cash on Hand January 1, 1980		\$ 0
(b) Cash on Hand at Beginning of Reporting Period	\$ 388.81	
(c) Total Receipts (from Line 18)	\$ 2100.00	\$ 7643.00
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)	\$ 2488.81	\$ 7643.00
7. Total Disbursements (from Line 28)	\$ 2469.73	\$ 7223.92
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))	\$ 19.08	\$ 19.08
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)	\$ 0	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	\$ 0	

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

For further information, contact:

G. MORGAN JONES, III

Federal Election Commission  
Toll Free 800-424-6530  
Local 202-623-4088

Type or Print Name of Treasurer

G. Morgan Jones, III

7.10.80

SIGNATURE OF TREASURER

Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

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

MT 7-17	[Signature]	[Signature]	MT 7-17	[Signature]	[Signature]		
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FEC FORM 3X (3/80)

820040313140891587

1980 JUN 16 PM 12:50

Name of Committee (in Full)	Report Covering the Period:	
<b>THE SIMON COMMITTEE</b>	From: <b>7-1-80</b>	To: <b>6-30-80</b>
	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
<b>I. RECEIPTS</b>		
<b>11. CONTRIBUTIONS (other than loans) FROM:</b>		
(a) Individuals/Persons Other Than Political Committees .....	2100.00	7643.00
(b) Political Party Committees .....		
(c) Other Political Committees .....		
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11a, 11b and 11c) .....	2100.00	7643.00
<b>12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES</b> .....	0	0
<b>13. ALL LOANS RECEIVED</b> .....	0	0
<b>14. LOAN REPAYMENTS RECEIVED</b> .....	0	0
<b>15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Returns, etc.)</b> .....	0	0
<b>16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES</b> .....	0	0
<b>17. OTHER RECEIPTS (Dividends, Interest, etc.)</b> .....	0	0
<b>18. TOTAL RECEIPTS (Add 11d, 12, 13, 14, 15, 16 and 17)</b> .....	2100.00	7643.00
<b>II. DISBURSEMENTS</b>		
<b>19. OPERATING EXPENDITURES</b> .....	2469.73	7223.92
<b>20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES</b> .....	0	0
<b>21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES</b> .....	0	0
<b>22. INDEPENDENT EXPENDITURES (Use Schedule E)</b> .....	0	0
<b>23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. §441a(d)) (Use Schedule F)</b> .....	0	0
<b>24. LOAN REPAYMENTS MADE</b> .....	0	0
<b>25. LOANS MADE</b> .....	0	0
<b>26. REFUNDS OF CONTRIBUTIONS TO:</b>		
(a) Individuals/Persons Other Than Political Committees .....	0	0
(b) Political Party Committees .....	0	0
(c) Other Political Committees .....	0	0
(d) TOTAL CONTRIBUTION REFUNDS (add 26a, 26b and 26c) .....	0	0
<b>27. OTHER DISBURSEMENTS</b> .....	0	0
<b>28. TOTAL DISBURSEMENTS (Add Lines 19, 20, 21, 22, 23, 24, 25, 26d and 27)</b> .....	2469.73	7223.92
<b>III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES</b>		
<b>29. TOTAL CONTRIBUTIONS (other than loans) from Line 11d</b> .....	2100.00	7643.00
<b>30. TOTAL CONTRIBUTION REFUNDS from Line 26d</b> .....	0	0
<b>31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from Line 29)</b> .....	2100.00	7643.00
<b>32. TOTAL OPERATING EXPENDITURES from Line 19</b> .....	2469.73	7223.92
<b>33. OFFSETS TO OPERATING EXPENDITURES from Line 15</b> .....	0	0
<b>34. NET OPERATING EXPENDITURES (subtract Line 33 from Line 32)</b> .....	2469.73	7223.92

8 8 0 0 1 3 1 4 0 8 9 8





SCHEDULE B

ITEMIZED DISBURSEMENTS

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Name of Committee (In Full)			
<b>THE SIMON COMMITTEE</b>			
<b>A. Full Name, Mailing Address and ZIP Code</b> BELL TELEPHONE CO Box 280 CONSHOHOCKEN, PA, 19429	<b>Purpose of Disbursement</b> TELEPHONE EXP. Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Date (month, day, year)</b> 4.10.80	<b>Amount of Each Disbursement This Period</b> 75.12
<b>B. Full Name, Mailing Address and ZIP Code</b> CONCORD MONITOR CONCORD NH 03301	<b>Purpose of Disbursement</b> NEWSPAPER EXP. Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Date (month, day, year)</b> 4.10.80	<b>Amount of Each Disbursement This Period</b> 22.16
<b>C. Full Name, Mailing Address and ZIP Code</b> BERKELEY PUBLISHING CO LYNDHURST N. J. 07071	<b>Purpose of Disbursement</b> BOOKS EXP. Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Date (month, day, year)</b> 4.10.80	<b>Amount of Each Disbursement This Period</b> 128.40
<b>D. Full Name, Mailing Address and ZIP Code</b> G. MORGAN JONES 761 FETTERS MILL RD. MUNTINGDON VALLEY, PA, PA	<b>Purpose of Disbursement</b> TRAVEL EXPENSE REIMBURSEMENT Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Date (month, day, year)</b> 4.18.80	<b>Amount of Each Disbursement This Period</b> 100.00
<b>E. Full Name, Mailing Address and ZIP Code</b> AMTRAK WASHINGTON DC, 20013	<b>Purpose of Disbursement</b> RAIL TICKET EXP. Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Date (month, day, year)</b> 4.21.80	<b>Amount of Each Disbursement This Period</b> 38.50
<b>F. Full Name, Mailing Address and ZIP Code</b> AT YOUR SERVICE INC 608 H ST. S.W. WASHINGTON DC, 20024	<b>Purpose of Disbursement</b> MAIL & PHONE ANSWERING EXP. Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Date (month, day, year)</b> 5.1.80	<b>Amount of Each Disbursement This Period</b> 160.00
<b>G. Full Name, Mailing Address and ZIP Code</b> AMERICAN LEAGUE OF LOBBYISTS WASHINGTON DC 20024	<b>Purpose of Disbursement</b> BKFAST MEETING EXPENSES Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Date (month, day, year)</b> 5.9.80	<b>Amount of Each Disbursement This Period</b> 61.00
<b>H. Full Name, Mailing Address and ZIP Code</b> G. MORGAN JONES 761 F.M. RD. H.V. PA. 19006	<b>Purpose of Disbursement</b> TRAVEL EXPENSE REIMBURSEMENT Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Date (month, day, year)</b> 5.9.80	<b>Amount of Each Disbursement This Period</b> 100.00
<b>I. Full Name, Mailing Address and ZIP Code</b> BELL TELEPHONE CO Box 280 CONSHOHOCKEN, PA, 19429	<b>Purpose of Disbursement</b> TELEPHONE EXPENSE Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Date (month, day, year)</b> 5.15.80	<b>Amount of Each Disbursement This Period</b> 71.06
<b>SUBTOTAL of Disbursements This Page (optional)</b> .....			756.24
<b>TOTAL This Period (last page this line number only)</b> .....			

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SCHEDULE B

ITEMIZED DISBURSEMENTS

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Name of Committee (in Full)			
<b>THE SIMON COMMITTEE</b>			
A. Full Name, Mailing Address and ZIP Code D.C. TREASURER WASHINGTON D.C.	Purpose of Disbursement LICENSE FEE EXPENSE Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 5.15.80	Amount of Each Disbursement This Period 10.00
B. Full Name, Mailing Address and ZIP Code G. MORGAN JONES 761 F.M. RD. H.V. PA. 19006	Purpose of Disbursement TRAVEL EXPENSE REIMBURSEMENT Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 5.28.80	Amount of Each Disbursement This Period 200.00
C. Full Name, Mailing Address and ZIP Code NORTHWEST ORIENT AIRLINES PHILADELPHIA, PA.	Purpose of Disbursement AIRLINE TICKET EXPENSE Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 5.29.80	Amount of Each Disbursement This Period 208.00
D. Full Name, Mailing Address and ZIP Code AMTRAK WASHINGTON DC 20013	Purpose of Disbursement RAIL TICKET EXP. Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 6.3.80	Amount of Each Disbursement This Period 40.50
E. Full Name, Mailing Address and ZIP Code AT YOUR SERVICE INC 608 H ST S.W. WASHINGTON DC 20024	Purpose of Disbursement MAIL TELEPHONE ANSWERING EXP. Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 6.3.80	Amount of Each Disbursement This Period 50.00
F. Full Name, Mailing Address and ZIP Code BELL TELEPHONE CO BOX 280 CONSHOHOCKEN, PA. 19429	Purpose of Disbursement TELEPHONE EXP. Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 6.10.80	Amount of Each Disbursement This Period 94.50
G. Full Name, Mailing Address and ZIP Code REPUBLICAN STATE COMM. OF PENNSYLVANIA HARRISBURG PA. 17120	Purpose of Disbursement HOTEL ROOM EXPENSE Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 6.11.80	Amount of Each Disbursement This Period 150.00
H. Full Name, Mailing Address and ZIP Code G. MORGAN JONES 761 F.M. RD. H.V. PA. 19006	Purpose of Disbursement TRAVEL EXPENSE REIMBURSEMENT Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 6.18.00	Amount of Each Disbursement This Period 500.00
I. Full Name, Mailing Address and ZIP Code AMTRAK WASHINGTON DC 20013	Purpose of Disbursement RAIL TICKET EXP. Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 6.24.80	Amount of Each Disbursement This Period 40.50
SUBTOTAL of Disbursements This Page (optional)			1293.50
TOTAL This Period (last page this line number only)			

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SCHEDULE B

ITEMIZED DISBURSEMENTS

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)			
THE SIMON COMMITTEE			
A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
POSTMASTER: BRYN ATHYN BRYN ATHYN, PA. 19009	POSTAGE EXPENSE	6-27-80	30.00
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
MORGAN STATIONERY CO 35 S. YORK ROAD. HATBORO PA, 19040	STAT. SUPPLY EXP.	6-27-80	9.94
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
CRAFT TRAVEL CO ABINGTON PA 19001	AIRLINE TICKET EXP.	6-30-80	220.00
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
MORGAN PRINTING CO. 40 S. YORK RD. HATBORO PA, 19040	PRINTING EXPENSE	6-30-80	151.05
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
CONCORD NATIONAL BANK MAIN STREET CONCORD, N.H. 03301	BANKING CHARGES SERVICE EXPENSE	6-30-80	9.00
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
SUBTOTAL of Disbursements This Page (optional) .....			419.99
TOTAL This Period (last page this line number only) .....			2469.73

0800311A8820

Independent Committee to Elect William E. Simon President  
Post Office Box "S"  
Bryn Athyn, Pennsylvania 19009

RECEIVED  
JUL 16 1980  
PT 49

RETURN RECEIPT  
REQUESTED

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

**CERTIFIED**  
P31  
JUL 16 1980  
**MAIL**

RECEIVED

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REPORT OF RECEIPTS AND DISBURSEMENTS  
For a Political Committee Other Than an Authorized Committee

RECEIVED

7(P)

80 OCT 14 P 2: 11

(Date) (Age)

1. Name of Committee (in Full)

C99001174  
**THE SIMON COMMITTEE**

PO BOX 5  
BRYN ATHYN

PA 19009

City, State and ZIP Code

Check if address is different than previously reported.

2. FEC Identification Number

**C99001174**

3.  This committee qualified as a multi-candidate committee during this Reporting Period on \_\_\_\_\_ (date)

4. TYPE OF REPORT (check appropriate boxes)

- (a)  April 15 Quarterly Report  
 July 15 Quarterly Report  
 **October 15 Quarterly Report**  
 January 31 Year-End Report  
 July 31 Mid Year Report (Non-election Year Only)  
 Monthly Report for \_\_\_\_\_  
 Twelfth day report preceding \_\_\_\_\_ (Type of Election) election on \_\_\_\_\_ in the State of \_\_\_\_\_  
 Thirtieth day report following the General Election on \_\_\_\_\_ in the State of \_\_\_\_\_  
 Termination Report

03 '80

(b) Is this Report an Amendment?  
 YES  NO

SUMMARY

	Column A This Period	Column B Calendar Year-to-Date New Committee
5. Covering Period <u>JULY 1, 1980</u> Through <u>SEPT 30, 1980</u>		
6. (a) Cash on Hand January 1, 1980		\$ 0
(b) Cash on Hand at Beginning of Reporting Period	\$ 19.08	
(c) Total Receipts (from Line 18)	\$ 7137.00	\$ 14780.00
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)	\$ 7156.08	\$ 14780.00
7. Total Disbursements (from Line 28)	\$ 6811.83	\$ 14035.75
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))	\$ 344.35	\$ 344.35
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)	\$ 0	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	\$ 0	

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

For further information, contact:

**G. MORGAN JONES, III**

Type or Print Name of Treasurer

**G. Morgan Jones, III**

SIGNATURE OF TREASURER

10-10-80

Date

Federal Election Commission  
Toll Free 800-424-9630  
Local 202-623-4068

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

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

MT 10-14									
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FEC FORM 3X (3/80)

03893449690



RECEIVED

80 OCT 14 P 2: 11

Name of Committee (in Full)  
**THE SIMON COMMITTEE**

Report Covering the Period:  
 From: **JUL 1** To: **SEP 30 1980**

02040314802641

	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
<b>I. RECEIPTS</b>		
<b>11. CONTRIBUTIONS (other than loans) FROM:</b>		
(a) Individuals/Persons Other Than Political Committees .....	7137.00	14,780.00
(b) Political Party Committees .....		
(c) Other Political Committees .....		
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11a, 11b and 11c) .....	7137.00	14,780.00
<b>12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES</b> .....	0	0
<b>13. ALL LOANS RECEIVED</b> .....	0	0
<b>14. LOAN REPAYMENTS RECEIVED</b> .....	0	0
<b>15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)</b> .....	0	0
<b>16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES</b> .....	0	0
<b>17. OTHER RECEIPTS (Dividends, Interest, etc.)</b> .....	0	0
<b>18. TOTAL RECEIPTS (Add 11d, 12, 13, 14, 15, 16 and 17)</b> .....	7137.00	14,780.00
<b>II. DISBURSEMENTS</b>		
<b>19. OPERATING EXPENDITURES</b> .....	6811.83	14,035.75
<b>20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES</b> .....	0	0
<b>21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES</b> .....	0	0
<b>22. INDEPENDENT EXPENDITURES (Use Schedule E)</b> .....	0	0
<b>23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. §441a(d)) (Use Schedule F)</b> .....	0	0
<b>24. LOAN REPAYMENTS MADE</b> .....	0	0
<b>25. LOANS MADE</b> .....	0	0
<b>26. REFUNDS OF CONTRIBUTIONS TO:</b>		
(a) Individuals/Persons Other Than Political Committees .....	0	0
(b) Political Party Committees .....	0	0
(c) Other Political Committees .....	0	0
(d) TOTAL CONTRIBUTION REFUNDS (add 26a, 26b and 26c) .....	0	0
<b>27. OTHER DISBURSEMENTS</b> .....	0	0
<b>28. TOTAL DISBURSEMENTS (Add Lines 19, 20, 21, 22, 23, 24, 25, 26d and 27)</b> .....	6811.83	14,035.75
<b>III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES</b>		
<b>29. TOTAL CONTRIBUTIONS (other than loans) from Line 11d</b> .....	7137.00	14,780.00
<b>30. TOTAL CONTRIBUTION REFUNDS from Line 26d</b> .....	0	0
<b>31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from Line 29)</b> .....	7137.00	14,780.00
<b>32. TOTAL OPERATING EXPENDITURES from Line 19</b> .....	6811.83	14,035.75
<b>33. OFFSETS TO OPERATING EXPENDITURES from Line 15</b> .....	0	0
<b>34. NET OPERATING EXPENDITURES (subtract Line 33 from Line 32)</b> .....	6811.83	14,035.75

SCHEDULE A

ITEMIZED RECEIPTS

Line number allocated for each category of the Detailed Summary Page

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Name of Committee (in Full) **THE SIMON COMMITTEE**

0 20 P 03:11 A 80 26 A ?

A. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
GABRIELE P. PENOLETON 6th FLOOR JENKINTOWN PLAZA JENKINTOWN, PA, 19046		NONE	7.7.80	300.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation HOUSEWIFE	Aggregate Year-to-Date-\$ 5800.00	
B. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
G. MORGAN JONES III 761 FATTERS MILL ROAD MONTICELLO VALLEY, PA, 19006		G. B. M. + B. WASHINGTON, DC.	7.7.80	1500.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation EXECUTIVE.	Aggregate Year-to-Date-\$ 500.00	
C. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
REPUBLICAN STATE COMMITTEE LOUISE H. RUSSELL. HARRISBURG PA, 17120		REFUND.	7.11.80	50.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation HOUSEWIFE	Aggregate Year-to-Date-\$	
D. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
GABRIELE P. PENOLETON 6th FLOOR JENKINTOWN PLAZA JENKINTOWN PA, 19046		NONE	7.22.80	3000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation HOUSEWIFE	Aggregate Year-to-Date-\$ 6200.00	
E. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
GABRIELE P. PENOLETON 6th FLOOR JENKINTOWN PLAZA JENKINTOWN, PA, 19046		NONE	9.3.80	1487.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation HOUSEWIFE	Aggregate Year-to-Date-\$ 9200.00	
F. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
JOE BAKER ASSOC OF WALL + CEILING INDUSTRIES INTERNATIONAL WASHINGTON, D.C. 20024		AICW.	9.3.80	500.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation EXECUTIVE	Aggregate Year-to-Date-\$ 500.00	
G. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
GABRIELE P. PENOLETON 6th FLOOR JENKINTOWN PLAZA JENKINTOWN PA, 19046		NONE	9.8.80	300.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation HOUSEWIFE	Aggregate Year-to-Date-\$ 10,687.00	
SUBTOTAL of Receipts This Page (optional) .....				7137.00
TOTAL This Period (last page this line number only) .....				7137.00

SCHEDULE B

ITEMIZED DISBURSEMENTS

103  
LINE NUMBER  
(Use separate schedules for each category of the Detailed Summary Page)

Any information copied from such Reports and Disbursements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)  
**THE SIMON COMMITTEE**

02093149683

A. Full Name, Mailing Address and ZIP Code <b>POSTMASTER BRYN ATHYN, PA, 19009</b>	Purpose of Disbursement <b>POSTAGE</b>	Date (month, day, year) <b>7-1-80</b>	Amount of Each Disbursement This Period <b>30.00</b>
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		

B. Full Name, Mailing Address and ZIP Code <b>AT YOUR SERVICE INC WASHINGTON, DC 20024</b>	Purpose of Disbursement <b>MAIL ANS EXP.</b>	Date (month, day, year) <b>7-2-80</b>	Amount of Each Disbursement This Period <b>50.00</b>
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		

C. Full Name, Mailing Address and ZIP Code <b>LOUISE H. RUSSELL HARRISBURG, PA, 17120</b>	Purpose of Disbursement <b>TRANSPORTATION</b>	Date (month, day, year) <b>7-2-8</b>	Amount of Each Disbursement This Period <b>171.60</b>
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		

D. Full Name, Mailing Address and ZIP Code <b>LOUISE H. RUSSELL HARRISBURG PA, 17120</b>	Purpose of Disbursement <b>AIR FARE</b>	Date (month, day, year) <b>7-2-80</b>	Amount of Each Disbursement This Period <b>682.00</b>
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		

E. Full Name, Mailing Address and ZIP Code <b>AL RICE PRODUCTIONS LIVONIA, MICH, 48918</b>	Purpose of Disbursement <b>MUSIC EXP.</b>	Date (month, day, year) <b>7-7-80</b>	Amount of Each Disbursement This Period <b>70.00</b>
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		

F. Full Name, Mailing Address and ZIP Code <b>BRYN ATHYN POSTMASTER BRYN ATHYN PA, 19009</b>	Purpose of Disbursement <b>POSTAGE</b>	Date (month, day, year) <b>7-8-80</b>	Amount of Each Disbursement This Period <b>56.00</b>
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		

G. Full Name, Mailing Address and ZIP Code <b>CRAFT TRAVEL ABINGTON, PA, 19001</b>	Purpose of Disbursement <b>AIR FARE</b>	Date (month, day, year) <b>7-9-80</b>	Amount of Each Disbursement This Period <b>968.00</b>
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		

H. Full Name, Mailing Address and ZIP Code <b>Bell Telephone Pa. CONSHOHOCKEN, PA, 19429</b>	Purpose of Disbursement <b>Telephone Exp.</b>	Date (month, day, year) <b>7-9-80</b>	Amount of Each Disbursement This Period <b>45.19</b>
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		

I. Full Name, Mailing Address and ZIP Code <b>GAIL + RICE PRODUCTIONS LIVONIA, MICH, 48918</b>	Purpose of Disbursement <b>MUSIC EXP.</b>	Date (month, day, year) <b>7-9-80</b>	Amount of Each Disbursement This Period <b>65.00</b>
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		

SUBTOTAL of Disbursements This Page (optional) ..... **2,137.79**

TOTAL This Period (last page this line number only) .....



SCHEDULE B

ITEMIZED DISBURSEMENTS

Page 2 of 2  
 LINE NUMBER 7  
 (Use separate schedules for each category of the Detailed Summary Page)

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Name of Committee (In Full)			
<b>THE SIMON COMMITTEE</b>			
<b>A. Full Name, Mailing Address and ZIP Code</b> HYATT REGENCY HOTEL DEARBORN, MICH. 48918	<b>Purpose of Disbursement</b> Hotel Room Exp. Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Date (month, day, year)</b> 7.12.80	<b>Amount of Each Disbursement This Period</b> 752.80
<b>B. Full Name, Mailing Address and ZIP Code</b> G. MORGAN JONES III HUNTINGDON VALLEY, PA, 19006	<b>Purpose of Disbursement</b> EXPENSE REIMB. Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Date (month, day, year)</b> 7.12.80	<b>Amount of Each Disbursement This Period</b> 300.00
<b>C. Full Name, Mailing Address and ZIP Code</b> BELL TELEPHONE / PA. CONSHOHOCKEN, PA, 19429	<b>Purpose of Disbursement</b> TELEPHONE EXP Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Date (month, day, year)</b> 8.15.80	<b>Amount of Each Disbursement This Period</b> 161.30
<b>D. Full Name, Mailing Address and ZIP Code</b> DETROIT PLAZA HOTEL DETROIT, MICH, 48203	<b>Purpose of Disbursement</b> RECEPTION EXP. Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Date (month, day, year)</b> 8.15.80	<b>Amount of Each Disbursement This Period</b> 544.20
<b>E. Full Name, Mailing Address and ZIP Code</b> AT YOUR SERVICE INC WASHINGTON DC 20024	<b>Purpose of Disbursement</b> MAIL + PHONE EXP. Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Date (month, day, year)</b> 8.15.80	<b>Amount of Each Disbursement This Period</b> 90.00
<b>F. Full Name, Mailing Address and ZIP Code</b> DETROIT PLAZA HOTEL DETROIT, MICH. 48203	<b>Purpose of Disbursement</b> RECEPTION EXP. Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Date (month, day, year)</b> 8.28.80	<b>Amount of Each Disbursement This Period</b> 2000.00
<b>G. Full Name, Mailing Address and ZIP Code</b> AM ASSOC EXECS. SOCIETY WASHINGTON, D.C. 20024	<b>Purpose of Disbursement</b> BOOKS EXP. Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Date (month, day, year)</b> 8.28.80	<b>Amount of Each Disbursement This Period</b> 25.00
<b>H. Full Name, Mailing Address and ZIP Code</b> G. MORGAN JONES II HUNTINGDON VALLEY, PA, 19006	<b>Purpose of Disbursement</b> TRAVEL EXP. Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Date (month, day, year)</b> 8.28.80	<b>Amount of Each Disbursement This Period</b> 50.00
<b>I. Full Name, Mailing Address and ZIP Code</b> G. MORGAN JONES, III HUNTINGDON VALLEY PA, 19006	<b>Purpose of Disbursement</b> EXP. REIMB. Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Date (month, day, year)</b> 8.28.80	<b>Amount of Each Disbursement This Period</b> 500.00
<b>SUBTOTAL of Disbursements This Page (optional)</b> .....			4,423.30
<b>TOTAL This Period (last page this line number only)</b> .....			

0 200 4 03 31 11 49 26 24 1

SCHEDULE B

ITEMIZED DISBURSEMENTS

303  
 LINE NUMBER  
 (Use separate schedules for each category of the Detailed Summary Page)

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Name of Committee (in Full)  
**THE SIMON COMMITTEE**

025004003; 1448036045

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
TREASURER CITY OF HARRISBURG HARRISBURG, PA, 17120	LIC Fee Exp. Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	9.28.80	6.00
B. Full Name, Mailing Address and ZIP Code BELL TELEPHONE /PA CONSHOHOCKEN, PA, 19429	Purpose of Disbursement Telephone Exp. Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	9.28.80	56.54
C. Full Name, Mailing Address and ZIP Code BELL TELEPHONE, /PA. CONSHOHOCKEN, PA, 19429	Purpose of Disbursement Telephone Exp. Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	9.28.80	149.20
D. Full Name, Mailing Address and ZIP Code POSTMASTER, BRYN ATHYN, PA, 19009	Purpose of Disbursement POSTAGE. EXP. Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	9.28.80	20.00
E. Full Name, Mailing Address and ZIP Code CONCORD NATIONAL BANK CONCORD N.H. 03301	Purpose of Disbursement BANK CHARGE EXP. Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	9.28.80	19.00
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional) .....			250.74
TOTAL This Period (last page this line number only) .....			6811.83



FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR # 1378

Date Filmed 8/26/82 Camera No. --- 2

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