



FEDERAL ELECTION COMMISSION

1125 K STREET NW  
WASHINGTON, D.C. 20461

THIS IS THE END OF MUR # 820

Date Filmed 8/30/79 Camera No. --- 2

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FEDERAL ELECTION COMMISSION

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

June 25, 1979

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

James F. Schoener  
Jenkins, Nystrom & Sterlacci, P.C.  
2033 M Street, N. W.  
Washington, D. C. 20036

Re: MUR 820

Dear Mr. Schoener:

On June 15, 1979, the Commission voted to terminate its investigation in MUR 820. A copy of the Commission's determination is enclosed for your information. Accordingly, the Commission intends to close its files in this matter.

Thank you for your cooperation.

Sincerely,

A handwritten signature in black ink, appearing to read "William C. Oldaker", is written over a faint, larger signature.

William C. Oldaker  
General Counsel

Enclosure:

Commission certification  
General Counsel's Report

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PS Form 3811, Apr 1977

● SENDER Complete items 1, 2, and 3  
Add your address in the "RETURN TO" space on reverse

1 The following service is requested (check one):  
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 (CONSULT POSTMASTER FOR FEES)

2 ARTICLE ADDRESSED TO  
*James F Schoener*

3 ARTICLE DESCRIPTION  
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 (Always obtain signature of addressee or agent)

I have received the article described above.  
 SIGNATURE  Addressee  Authorized agent

4 *Susan Steinhilber*  
 DATE OF DELIVERY

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6 UNABLE TO DELIVER BECAUSE: \_\_\_\_\_ CLERK'S INITIALS \_\_\_\_\_

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FEDERAL ELECTION COMMISSION

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

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6/22/79

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

James F. Schoener  
Jenkins, Nystrom & Sterlacci, P.C.  
2033 M Street, N. W.  
Washington, D. C. 20036

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Sincerely,

William C. Oldaker  
General Counsel

Enclosure:

Commission certification



FEDERAL ELECTION COMMISSION

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

June 25, 1979

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

James Howard Stewart, Jr.  
Friends of Donald Stewart Committee  
3701 Knollwood Drive  
Anniston, Alabama 36201

Re: MUR 820

Dear Mr. Stewart:

On June 15, 1979, the Commission voted to terminate its investigation in MUR 820. A copy of the Commission's determination is enclosed for your information. Accordingly, the Commission intends to close its files in this matter.

If further information comes to your attention which you believe establishes a violation of the Federal Election Campaign Act of 1971, as amended, please contact me.

Sincerely,

William C. Oldaker  
General Counsel

Enclosure:

Commission certification  
General Counsel's Report

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PS Form 3811, Apr 1977

RETURN RECEIPT REGISTERED, INSURED AND CERTIFIED MAIL

SENDER: Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.

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2. ARTICLE ADDRESSED TO:  
*James H. Stewart*

3. ARTICLE DESCRIPTION:  
REGISTERED NO. | CERTIFIED NO. | INSURED NO.

(Always obtain signature of addressee or agent)

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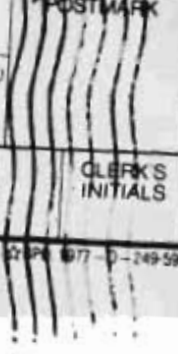
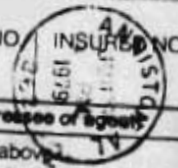
SIGNATURE  Addressee  Authorized agent

4. *James H. Stewart*  
DATE OF DELIVERY *6-29-79* POSTMARK

5. ADDRESS (Complete only if requested)

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249-596





FEDERAL ELECTION COMMISSION

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

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6/22/79

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

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Friends of Donald Stewart Committee  
3701 Knollwood Drive  
Anniston, Alabama 36201

Re: MUR 820

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If further information comes to your attention which you believe establishes a violation of the Federal Election Campaign Act of 1971, as amended, please contact me.

Sincerely,

William C. Oldaker  
General Counsel

Enclosure:

Commission certification



FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO CHARLES STEELE *mwe*  
FROM: MARJORIE W. EMMONS  
DATE: JUNE 22, 1979  
SUBJECT: MUR 820 - Letters to Respondent and  
Complainant - Memorandum  
from OGC dated 6-20-79:  
Received in OCS 6-20-79, 2:37

The above-named document was circulated on a 24  
hour no-objection basis at 11:00, June 21, 1979.

The Commission Secretary's Office has received  
no objections to the draft letters in relation to MUR 820  
as of 12:30 this date.

79040152352

June 20, 1979

MEMORANDUM TO: Marge Emmons  
FROM: Elissa T. Garr  
SUBJECT: MUR 820

Please have the attached Memo and letters distributed  
to the Commission on a 24 hour no-objection basis.

Thank you.

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FEDERAL ELECTION COMMISSION

1125 K STREET N.W.  
WASHINGTON, D.C. 20461

RECEIVED  
C. M. ...

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June 20, 1979

MEMORANDUM TO: THE COMMISSION  
FROM: WILLIAM C. OLDAKER *W. C. Oldaker*  
SUBJECT: LETTERS TO RESPONDENT AND COMPLAINANT  
MUR 820

Attached are draft letters to Respondent's attorney, James F. Schoener, and Complainant, James Howard Stewart, Jr., notifying them of the Commission's decision to close the file in this matter.

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FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

James Howard Stewart, Jr.  
Friends of Donald Stewart Committee  
3701 Knollwood Drive  
Anniston, Alabama 36201

Re: MUR 820

Dear Mr. Stewart:

On June 15, 1979, the Commission voted to terminate its investigation in MUR 820. A copy of the Commission's determination is enclosed for your information. Accordingly, the Commission intends to close its files in this matter.

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Sincerely,

William C. Oldaker  
General Counsel

Enclosure:

Commission certification

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FEDERAL ELECTION COMMISSION

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

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James F. Schoener  
Jenkins, Nystrom & Sterlacci, P.C.  
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Thank you for your cooperation.

Sincerely,

William C. Oldaker  
General Counsel

Enclosure:

Commission certification

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
National Republican Senatorial )  
Committee )

MUR 820 (78)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, certify that on June 14, 1979, the Commission, meeting in an executive session at which a quorum was present, took the following actions in the above-captioned matter:

1. Failed by a vote of 2-3 to pass a motion to amend Recommendation #3 of the General Counsel's June 6, 1979 report in MUR 820 (78) to read as follows:

"3. Find reason to believe that the Republican National Committee and the National Republican Senatorial Committee may have violated 2 U.S.C. §441a(h) by making contributions to James Martin of Alabama during the calendar year 1978 in excess of the limitations of that provision of the ACT."

Commissioners Harris and McGarry voted affirmatively for the motion. Commissioners Aikens, Friedersdorf, and Thomson dissented. Commissioner Tiernan abstained.

2. Determined by a vote of 6-0 to approve the General Counsel's recommendation to take no further action in connection with the National Republican Senatorial Committee (NRSC)'s possible violation of 2 U.S.C. §441a(d) in connection with the Senatorial campaign of James Martin of Alabama.
3. Failed by a vote of 2-3 to pass a motion to adopt the General Counsel's recommendation to find reason to believe that the National Republican Senatorial Committee may have violated 2 U.S.C. §434 by reporting expenditures made in connection with the Alabama Senatorial primary, and made prior to the time NRSC was the designated agent of RNC, as coordinated expenditures under 2 U.S.C. §441a(d), 11 C.F.R. §110.7(a)(4).

Commissioners Harris and McGarry voted affirmatively for the motion. Commissioners Aikens, Friedersdorf, and Thomson dissented. Commissioner Tiernan abstained.

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4. Failed by a vote of 2-3 to adopt the recommendation of the General Counsel to find reason to believe that the National Republican Senatorial Committee may have violated 2 U.S.C. §441a(h) by making contributions to James Martin of Alabama during calendar year 1978 in excess of the limitations of that provision of the Act.

Commissioners Harris and McGarry voted affirmatively for the motion. Commissioners Aikens, Friedersdorf, and Thomson dissented. Commissioner Tiernan abstained.

5. Passed by a vote of 4-2 a motion to close the file in MUR 820 (78).

Commissioners Aikens, Friedersdorf, Thomson, and Tiernan voted affirmatively for the motion. Commissioners Harris and McGarry abstained.

Accordingly, the file has been closed on MUR 820 (78).

Attest:

6/15/79

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary to the Commission

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FEDERAL ELECTION COMMISSION

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

June 13, 1979

MEMORANDUM TO: THE COMMISSION

FROM: WILLIAM C. OLDAKER *W. C. Oldaker*  
GENERAL COUNSEL

SUBJECT: REVISED PAGE 7 FOR GENERAL COUNSEL'S REPORT  
ON MUR 820

As per a discussion in the Commission meeting on Tuesday, attached is a revised page 7 of the General Counsel's Report on MUR 820. Please substitute this revised page for the page 7 presently in your copy of this report. As you know, this matter has been held over for discussion in the Commission meeting tomorrow.

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
National Republican ) MUR 820 (78)  
 )  
Senatorial Committee )

GENERAL COUNSEL'S REPORT

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On December 13, 1978, the Commission found reason to believe that the National Republican Senatorial Committee (NRSC) may have violated 2 U.S.C. § 441a(d) by making expenditures in connection with the Senatorial Campaign of James Martin of Alabama in excess of the § 441a(d) limitations published by the Commission. The Commission's published calculations for party spending limits for Senatorial contests limit the national and state committees of the Republican Party to spending no more than \$62,506.94 each on behalf of a Republican candidate for Senate in the state of Alabama. If the National Republican Senatorial Committee acted as the authorized agent of both the National Republican Committee and the Alabama Republican Party, its total spending limit on behalf of Candidate Martin's Senatorial campaign was \$125,013.88. NRSC reported a total of \$196,355.85 in § 441a(d) expenditures on behalf of the Martin campaign.

In response to questions submitted by the Office of General Counsel, NRSC furnished:



1. Letters from the Republican National Committee authorizing NRSC to make § 441a(d) expenditures in connection with the Martin campaign -
  - (A) Letter dated 09/05/78 - \$10,000.
  - (B) Letter undated - \$52,000.
  - (C) Letter undated - \$60,000.
  - (D) Letter undated - \$ 1,000.
  
2. Agreements with the Alabama Republican Executive Committee authorizing NRSC to make § 441a(d) expenditures in connection with the Martin campaign -
  - (A) Agreement dated 08/22/78 - \$60,000.
  - (B) Agreement undated - \$62,000.
  
3. Affidavit of Rodney A. Smith, Treasurer, NRSC, in which Mr. Smith states that he supervised and directed the expenditure of § 441a(d) funds in connection with the Martin campaign as authorized by the Republican National Committee and by the Alabama Republican Executive Committee. Mr. Smith further stated that such expenditures were made "properly and in accordance with Commission Advisory Opinion 1978-19."

As stated, NRSC reports disclose a total of \$196,355.85 in § 441a(d) expenditures in connection with the Martin campaign. The affidavit of Rodney A. Smith and additional enclosed materials allocate \$73,370.55 to the Martin Campaign for the Sparkman Senate Seat (S<sub>1</sub>) and \$122,985.30 to the Martin Campaign for the Allen Senate Seat (S<sub>2</sub>). Mr. Martin was a candidate for the Sparkman Seat until October 2, 1978, when he announced his candidacy for the Allen seat. NRSC purports to apply AO 78-19, the "Fraser AO", in its application of separate § 441a(d) expenditure limits to the two Martin races.

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Thus, NRSC contends that it could spend a maximum of \$122,000 in connection with S<sub>1</sub>, as authorized by the Republican National Committee and the Alabama Republican Executive Committee, and \$123,000 in connection with S<sub>2</sub>, as authorized.

#### LEGAL ANALYSIS

The Commission's Advisory Opinion 78-19 was in response to a request made by the Fraser Senate Committee concerning the application of FECA to transfers between principal campaign committees for Candidate Fraser in his campaign for two separate Senate races. The Commission noted that

[t]he Act specifically permits, and exempts from contribution limits, the transfer of funds from the principal campaign committee of a candidate seeking one Federal office to the principal campaign committee of the same candidate who seeks another Federal office. 2 U.S.C. § 441a(a)(5)(C).

The Advisory Opinion then concluded that FECA's disclosure threshold and contribution limitations would apply to any contributions transferred by one such principal campaign committee to the other.

Advisory Opinions rendered by the Commission apply a general rule of law to a specific factual situation. 2 U.S.C. § 437f(a). And any advisory opinion rendered by the Commission may be relied upon by

(a) any person involved in the specific transaction or activity with respect to which such advisory opinion is rendered; and (b) any person involved in any specific transaction or activity...

2 U.S.C. § 437f(b)(2). See also 11 C.F.R. § 112.5.

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Thus, it would appear that the Martin principal campaign committee for S<sub>1</sub> could properly rely on AO 78-19 in its transfer of funds to the Martin principal campaign committee for S<sub>2</sub>, that being "indistinguishable in all its material aspects" from the activity in AO 78-19. However, NRSC's expenditure of § 441a(d) funds in connection with Martin's S<sub>1</sub> and S<sub>2</sub> campaigns would seem to be materially different from transfers between two principal campaign committees.

The question then becomes whether, absent AO 78-19, as precedent, NRSC could successfully interpret the language of the statute, 2 U.S.C. § 441a(d), to impose limitations on party coordinated expenditures in connection with general election campaigns for specific Senate seats rather than in connection with general election campaigns of specific candidates. In other words, could NRSC, consistent with § 441a(d) spend up to \$122,000, as authorized by RNC and AREC, in connection with the Sparkman Senate seat and \$123,000, as authorized, in connection with the Allen Senate seat even though James Martin was the Republican candidate supported by NRSC in both races. Or was NRSC limited by § 441a(d) to spending no more than \$122,000, as authorized, in connection with James Martin's Senatorial campaign whether that be for the Sparkman seat or the Allen seat.

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The language of the statute is less than clear in this regard. Section 441a(d) imposes limitations on expenditures "in connection with the general election campaign of a candidate for Federal office." 2 U.S.C. § 441a(d). This language is susceptible of interpretation as placing a limit on party coordinated expenditures in connection with Federal races or in connection with Federal candidates. The Commission's regulations do not assist in this matter. 11 C.F.R. § 110.7.

Therefore, the Office of General Counsel recommends that the Commission take no further action in connection with the National Republican Senatorial Committee's possible violation of 2 U.S.C. § 441a(d) since the statute is not explicit on whether the expenditure limitations apply to Federal candidates or to Federal Senate seats. The Commission will want to consider this matter fully in drafting a new Regulation prior to the 1980 elections. However, the Commission's decision to take no further action in this matter should not be read as an adoption of NRSC's interpretation of the statute.

However, it is clear that coordinated party expenditures under § 441a(d) are limited to expenditures "in connection with the general election." The primary election in Alabama was held on September 5, 1978, with a Runoff on September 26, 1978. The Commission's (E) Index shows NRSC expending \$3,000

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in coordinated expenditures on July 19, 1978 and \$25,000 in coordinated expenditures on September 1, 1978. NRSC's own journal entries show the July 19, 1978 amount of \$3,000 charged to the National Party limit and the September 1, 1978 amount of \$25,000 charged to the State Party limit. If these expenditures were in connection with the Alabama primary or runoff election rather than in connection with the general election, they would not be allowable under 2 U.S.C. §441a(d). In addition, since the only dated letters of authorization to NRSC were a letter from the Republican National Committee dated September 5, 1978 and one from the Alabama Republican Executive Committee dated August 22, 1978, the July 19, 1978 expenditure would seem outside the scope of § 441a(d) as NRSC was not the "designated agent" of the RNC at the time of the expenditure.

Therefore, the Office of the General Counsel recommends that the Commission find reason to believe that NRSC may have violated 2 U.S.C. § 434 by reporting expenditures made in connection with the Alabama Senatorial primary, and made prior to the time NRSC was the designated agent of RNC, as coordinated expenditures under 2 U.S.C. § 441a(d), 11 C.F.R. § 110.7(a)(4).

NRSC also reports one coordinated expenditure of \$50,000 made on October 2, 1978, the day that James Martin switched his candidacy from the Sparkman seat to the Allen seat. NRSC's

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journal entries allocate \$28,458.63 of this amount to the Allen Senate seat campaign and the balance to the Sparkman Senate seat campaign. The Office of General Counsel recommends that the Commission seek further details from NRSC concerning this expenditure, e.g., the purpose of the expenditure, the method of determining the allocation of the expenditure to S<sub>1</sub> and S<sub>2</sub>. Therefore, the Office of General Counsel recommends that the Commission approve and send the attached letter and interrogatories.

Finally, NRSC reports contributions pursuant to 2 U.S.C. § 441a(h) to both the S<sub>1</sub> and S<sub>2</sub> Martin campaigns. The Commission's (G) Index shows a transfer of \$600,000 from the Republican National Committee to the NRSC on August 3, 1977. NRSC ledger sheets allocate § 441a(h) contributions in the amount of \$16,493.27 to candidate Martin in his race for the Sparkman Senate seat (S<sub>1</sub>) and \$17,300.00 as § 441a(h) contributions to candidate Martin in his race for the Allen Senate seat (S<sub>2</sub>). A question has been raised as to the accuracy of interpreting 2 U.S.C. § 441a(h) to limiting Senatorial Campaign Committee contributions to candidates for specific Senate seats. Does § 441a(h) permit a \$17,500 contribution by NRSC to candidate Martin in his S<sub>1</sub> campaign and another \$17,500 contribution by NRSC to candidate Martin in his S<sub>2</sub> campaign?

The provision reads:

(h) Notwithstanding any other provision of this Act, amounts totaling not more than \$17,500 may be contributed to a candidate for nomination for election, or for election, to the United States Senate during the year in which an election is held in which he is such a candidate, by the

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Republican or Democratic Senatorial Campaign Committee, or the national committee of a political party, or any combination of such committees.

2 U.S.C. § 441a(h). The important limiting phrase here is "to a candidate for ... election, to the United States Senate during the year in which an election is held in which he is such a candidate." The limiting phrase in § 441a(d)(3) reads "in connection with the general election campaign of a candidate." Thus, the question becomes whether the language of § 441a(h) or its legislative history can be construed more clearly than that of § 441a(d)(3) to apply either to contributions to individual candidates for the Senate or to contributions to specific senate races. The legislative history is helpful in this regard.

Section 441a(h) began as an amendment offered by Senator Johnston during the senate floor debate of FECA's 1976 amendments. 122 Cong. Rec. S 3,805 (daily ed. March 18, 1976) (Remarks of Senator Johnston). The provision as originally introduced amended what became the \$5,000 contribution limitation of § 441a(2)(A) to add the following:

After "exceed \$5,000." add "except that the Republican or Democratic Senatorial Campaign Committee, the Democratic National Congressional Committee, the National Republican Congressional Committee, or the national committee of a political party may contribute at any time amounts not exceeding \$20,000 to candidates for Congress with respect to any or all of the elections in which such candidates seek office during an election year."

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Id. (Emphasis added). Senator Johnston explained his amendment:

What it does is simply this: it increases to \$20,000 per year for elections that the committee may give to any candidate. Under the present law the committee, the Senatorial, Democratic or Republican, Committee may give \$5,000 per election, election including the primary, runoff, and general election, or \$15,000 for candidates who have all three elections.

What this amendment does is simply say that that amount is increased to \$20,000 is not made dependent upon whether they are primaries, runoffs, or general elections.

Id. (Emphasis added). After some discussion, Senator Johnston amended his amendment to read:

At the appropriate place in the bill insert the following: "Notwithstanding any other provision of this Act the Republican or Democratic Senatorial Campaign Committee, the Democratic National Congressional Committee, the National Republican Congressional Committee, or the national committee of a political party may contribute at any time amounts not exceeding \$20,000 to candidates for Congress with respect to any or all of the elections in which such candidates seek office during an election year."

Id. at S 3,806 (Emphasis added). The Senate voted 64-20 to accept Senator Johnston's amendment as set out above. Id. at S 3,808.

The Senate next discussed the Johnston amendment on March 24, 1976 in the context of an amendment in the nature of a substitute to S.3065 introduced by Senator Cannon. Senator Cannon made the following statement in connection with the substitute's effect on the Johnston amendment:

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Second, the amendment to S.3065 proposed by Senator Johnston and previously adopted by the Senate is modified to clarify that contributions by the specified party committees do not aggregate more than \$20,000 in an election year.

122 Cong. Rec. S 4,150 (daily ed. March 24, 1976) (Remarks of Senator Cannon) (Emphasis added). Final action on the amendment in the Senate limited its effect to the Senate, Id. at S 4,158 (Remarks of Mr. Johnston) and decreased the limitation from \$20,000 to \$17,500, Id. at S 6,365. The only discussion by the House is contained at H 3,783 (Remarks of Rep. Peyser). Finally, discussion in the House-Senate Conference on S.3065 also indicates that this provision was intended to limit contributions by Senatorial campaign committees to candidates "per calendar year". House-Senate Conferees, Conference Report to accompany S.3065, Federal Election Campaign Act Amendments of 1976 at 375-77 (April 7, 1976). Complete copies of the above-referenced legislative history are attached.

Thus, it appears that there is sufficient legislative history to support an interpretation of 2 U.S.C. § 441a(h) which would limit NRSC in its contributions to a candidate to \$17,500 per calendar year regardless of the number of elections in which the candidate ran and regardless of the number of Senate seats for which the individual was a candidate.

Although Congressional debate did not specifically anticipate that one individual would be a candidate in more than one Senate race in one year, it is clear that the limitation was

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meant to apply per year not per election. Thus, the rationale of the Fraser AO which required that contributions transferred from S<sub>1</sub> to S<sub>2</sub> be allocated to the original contributors for contribution limitation purposes would be inapposite here where the limitation applies per year and not per election. AO 1978-19. This analysis is consistent with AO 1978-64 which advised NRSC that the \$17,500 limitation of 2 U.S.C. § 441a(h) "relate to a particular candidate for the Senate rather than a particular Senate seat."

Therefore, the Office of General Counsel recommends that the Commission find reason to believe that the National Republican Senatorial Committee may have violated 2 U.S.C. § 441a(a)(h) by making contributions to James Martin during calendar year 1978 in excess of the limitations of that provision of the Act.

RECOMMENDATIONS

1. Take no further action in connection with the National Republican Senatorial Committee (NRSC)'s possible violation of 2 U.S.C. § 441a(d) in connection with the Senatorial campaign of James Martin of Alabama.

2. Find reason to believe that the National Republican Senatorial Committee may have violated 2 U.S.C. § 434 by reporting expenditures made in connection with the Alabama Senatorial primary, and made prior to the time NRSC was the designated agent of RNC, as coordinated expenditures under 2 U.S.C. § 441a(d), 11 C.F.R. § 110.7(a)(4).

79040152370



3. Find reason to believe that the National Republican Senatorial Committee may have violated 2 U.S.C. § 441a(h) by making contributions to James Martin of Alabama during calendar year 1978 in excess of the limitations of that provision of the Act.

4. Approve and send the attached letter and interrogatories.

DATE

6/13/79

WILLIAM C. OLDAKER  
GENERAL COUNSEL



Attachments

1. NRSC Response
2. Letter to Respondent and Interrogatories
3. Legislative History

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LAW OFFICES

JENKINS, NYSTROM & STERLACCI, P.C.

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WASHINGTON, D C 20036

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OF COUNSEL  
JOHN B CONLAN  
EDWARD A. RYDEN

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15999 WEST TWELVE MILE ROAD  
SOUTHFIELD, MICHIGAN 48076  
(313) 559-2828

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DENNIS H. NYSTROM  
MICHAEL A. STERLACCI  
CARL F. SCHIER  
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JAMES F. SCHOENER  
STEPHEN J. HITCHCOCK  
CHRIS M. PARFITT  
GARY J. NYSTROM  
RONALD A. DENEWETH  
TIMOTHY J. MULLINS

January 10, 1979

Kathleen Imig Perkins, Esq.  
Office of General Counsel  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

800287

Re: M U R 820

Dear Ms. Perkins:

Enclosed you will find the affidavit of Mr. Rodney A. Smith, treasurer of the National Republican Senatorial Committee concerning expenditures and contributions to the two Martin for Senate Committees. As is apparent from the last part of the affidavit, Mr. Martin resigned from his candidacy for the Senate seat of retiring Senator John Sparkman (Class 2, United States Senate) in October 1978, and was thereafter nominated to run for the seat left vacant by the untimely death of Senator James Allen of Alabama (Class 3, United States Senate). A similar situation had previously occurred in Minnesota and Advisory Opinion 1978-17 to Congressman Fraser was studiously followed to give direction for such a change in candidacy.

The affidavit should show our compliance with the requirements of that Advisory Opinion and I attach hereto copies of assignment and allocation agreements of the National and State Party committees authorizing our acting as their agent in each of these campaign committees.

I will be glad to furnish any further information or documentation needed to indicate our compliance in this matter, and ask that before any further action is taken that we be given an opportunity for a conference or answer further questions in writing.

Respectfully,

*James F. Schoener*  
James F. Schoener

JFS:cal

Enclosures

P.S. I also enclose a copy of the review by Stan Huckaby, the C.P.A. who checked the items mentioned in the Rodney Smith affidavit.

79040152372

Republican  
National  
Committee

September 5, 1978

The Honorable Bob Packwood, Chairman  
National Republican Senatorial Committee  
227 Massachusetts Avenue, NE  
Washington, D. C. 20002


Dear Bob:

By this letter the Republican National Committee authorizes the National Republican Senatorial Committee to serve as the agent of the Republican National Committee, for the purpose of making expenditures pursuant to 2 USC S441a (d) (3). Your Committee is authorized to make these expenditures, on behalf of the Republican National Committee, in connection with the general election campaign of James Martin of Alabama.

Under S441a (d) (3) you may spend, on the Republican National Committee's behalf, up to \$10,000 for Mr. Martin.

Best personal regards.

Very truly yours,

  
BILL BROCK

BB/bnp

cc: Bob Moore  
Ben Cotten  
Charlie Black  
Jacquie Nystrom  
Matt Kirgau  
Jay Banning

79040152373

Republican  
National  
Committee

Bill Brock  
Chairman

The Honorable Bob Packwood, Chairman  
National Republican Senatorial Committee  
227 Massachusetts Avenue, NE  
Washington, D. C. 20002

Dear Bob:

By this letter the Republican National Committee authorizes the National Republican Senatorial Committee to serve as the agent of the Republican National Committee, for the purpose of making expenditures pursuant to 2 USC S441a(d)(3). Your Committee is authorized to make these expenditures, on behalf of the Republican National Committee, in connection with the general election campaign of Senate Seat 1, Alabama and is in addition to our letter of Sept. 5, 1978, in the amount of \$10,000.

Under S441a(d)(3) you may spend, on the Republican National Committee's behalf, an additional \$52,000 for Mr. Martin, bringing the cumulative total to \$62,000.

Best personal regards.

Very truly yours,

*Bill*  
BILL BROCK

BB/bnp

cc: Bob Moore  
Ben Cotton  
Charlie Black  
Jacquie Nystrom  
Jay Banning

7 2 0 4 0 1 5 2 3 7 4

Republican  
National  
Committee

Bill Brock  
Chairman

The Honorable Bob Packwood, Chairman  
National Republican Senatorial Committee  
227 Massachusetts Avenue, NE  
Washington, D. C. 20002

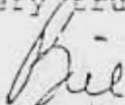
Dear Bob:

By this letter the Republican National Committee authorizes the National Republican Senatorial Committee to serve as the agent of the Republican National Committee, for the purpose of making expenditures pursuant to 2 USC S441a(d)(3). Your Committee is authorized to make these expenditures, on behalf of general election campaign of Senate Seat #2.

Under S441a(d)(3) you may spend, on the Republican National Committee's behalf, up to \$60,000 for Mr. James Martin, of Alabama .

Best personal regards.

Very truly yours,

  
BILL BROCK

BB/bnp

cc: Bob Moore  
Ben Cotten  
Charlie Black  
Jacquie Nystrom  
Jay Banning  
Kenny Klinge

79040152375

Republican  
National  
Committee

Bill Brock  
Chairman

The Honorable Bob Packwood, Chairman  
National Republican Senatorial Committee  
227 Massachusetts Avenue, NE  
Washington, D. C. 20002

Dear Bob:

By this letter the Republican National Committee authorizes the National Republican Senatorial Committee to serve as the agent of the Republican National Committee, for the purpose of making expenditures pursuant to 2 USC S441a(d)(3). Your Committee is authorized to make these expenditures, on behalf of the Republican National Committee, in connection with the general election campaign of Senate Seat #2. and is in addition to our letter in the amount of \$60,000.

Under S441a(d)(3) you may spend, on the Republican National Committee's behalf, an additional \$1,000 for Mr. Allen, bringing the cumulative total to \$61,000.

Best personal regards.

Very truly yours,

*Bill*  
BILL BROCK

BB/bnp

cc: Bob Moore  
Ben Cotten  
Charlie Black  
Jacquie Nystrom  
Jay Banning  
Kenny Klinge

79040152376



Republican  
National  
Committee

William D. Harris, State Chairman  
Member for Alabama  
P. O. Box 3315  
Birmingham, Alabama 35205  
(205) 322-5733

AGREEMENT BETWEEN  
THE NATIONAL REPUBLICAN SENATORIAL COMMITTEE  
AND THE ALABAMA REPUBLICAN EXECUTIVE COMMITTEE

The National Republican Senatorial Committee, hereinafter known as "Senatorial", agrees with the Alabama Republican Executive Committee, hereinafter known as "State"; as follows:

1. Under the provision of 441 a(d) (3) of Title 2 of the United States Code, State (and its subordinate committees) may make certain expenditures in connection with the general election campaign of the candidate for the office United States Senator for the State of Alabama.
2. Such amount of allowed expenditures under said provision has been computed tentatively by the Federal Election Commission as the amount of \$62,507.00.
3. That State wishes to designate Senatorial its agent for the purpose of making such expenditures up to the amount of \$60,000.00.
4. State agrees to file an allocation statement concerning the amount not assigned to Senatorial as required by the Federal Election Commission Regulation 110.7(c).
5. State agrees to carry out the provisions of such allocation statement and will promptly advise Senatorial at any time that State and its subordinate committees reach 90% of the amount retained by State and a review of this agreement will occur at such time.
6. Senatorial agrees to make such expenditures in behalf of candidate, or if it is in any manner unable to make such expenditures, to promptly release and cancel said agency and reassign such allocated amount to State.

This agreement signed the date opposite the respective parties' name to be effective when signed by both parties.

Dated Nov 22, 1978 1978 at  
Washington, D. C.

National Republican Senatorial Committee

By Rob H. Smith  
Title Treasurer

Alabama Republican Executive Committee

By William D. Harris  
Title Chairman

Title Chairman

79040152377

Dated 10/22/1978 1978 at  
Birmingham, Alabama.

Republican  
National  
Committee

William D. Harris, State Chairman  
Member for Alabama  
P.O. Box 3315  
Birmingham, Alabama 35205  
(205) 322-9733

*Original*

AGREEMENT BETWEEN  
THE NATIONAL REPUBLICAN SENATORIAL COMMITTEE  
AND THE ALABAMA REPUBLICAN EXECUTIVE COMMITTEE

The National Republican Senatorial Committee, hereinafter known as "Senatorial", agrees with the Alabama Republican Executive Committee, hereinafter known as "State"; as follows:

1. Under the provision of 441 a(d) (3) of Title 2 of the United States Code, State (and its subordinate committees) may make certain expenditures in connection with the special general election campaign of the candidate for the office United States Senator for the State of Alabama unexpired term Place #2.
2. Such amount of allowed expenditures under said provision has been computed tentatively by the Federal Election Commission as the amount of \$62,507.00.
3. That State wishes to designate Senatorial its agent for the purpose of making such expenditures up to the amount of \$62,000.00
4. State agrees to file an allocation statement concerning the amount not assigned to Senatorial as required by the Federal Election Commission Regulation 110.7(c).
5. State agrees to carry out the provisions of such allocation statement and will promptly advise Senatorial at any time that State and its subordinate committees reach 80% of the amount retained by State and a review of this agreement will occur at such time.
6. Senatorial agrees to make such expenditures in behalf of candidate, or if therein any manner unable to make such expenditures, to promptly release and cancel said agency and reassign such allocated amount to State.

This agreement signed the date opposite the respective parties' name to be effective when signed by both parties.

Dated \_\_\_\_\_ 1978 at  
Washington, D. C.

National Republican Senatorial Committee

By *R. P. [Signature]*  
Title *Treasurer*

Alabama Republican Executive/Committee

Dated \_\_\_\_\_ 1978 at  
Birmingham, Alabama

By *William D. Harris*  
Title Chairman

79040152378



*Political Financial Services*

901 L'Enfant Plaza Center, S.W.

Washington, D.C. 20024

(202) 554-2206

Stan Huckaby

Re: (202) 554-4579

Federal Campaign  
Financial Consulting Services

October 17, 1978

Rod Smith  
National Republican Senatorial Committee  
227 Massachusetts Avenue, NE  
Washington, DC 20002

Dear Rod,

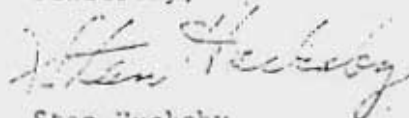
Pursuant to our conversation of last week, I am submitting the following figures to the National Republican Senatorial Committee concerning your limitations on the Jim Martin For Senate Committee.

As you know, Mr. Martin has changed candidacy for election to the United States Senate, and, therefore, under the law, is entering a new election. In accordance with Advisory Opinion 1978-19, we have made an allocation of the "coordinated expenditures" made by the National Republican Senatorial Committee between the first senate race and the second senate race. Of the \$100,000.00 in coordinated expenditures that you have made, \$70,170.55 has been allocated to the first senate campaign, and \$28,458.63 has been allocated to the second campaign. The remaining balance of \$1,370.82 is presently being refunded to you by the vendor. Using A.C. 1978-19, all of your contributions (\$17,500.00 maximum) made to the first senate campaign are non-allocable to the second campaign. Therefore, that limit will begin again. I understand that you have made subsequent contributions to the second senate campaign, and those amounts should be added to the \$28,458.63 in determining the total amount remaining for coordinated expenditures in the second senate campaign. A detailed explanation for this allocation has been telecopied to you by the Jim Martin for Senate Campaign Committee.

All allocations have been made based on the exact amounts of invoices given to us by vendors. Should any of these amounts have a slight variation, we will immediately notify you as to the effects they have on your limitation.

Please feel free to contact me if you have any further questions concerning this matter.

Sincerely,



Stan Huckaby

SH:tub

7 9 0 4 0 1 5 2 3 7 9

UNITED STATES OF AMERICA  
Before the FEDERAL ELECTION COMMISSION

In the matter of  
NATIONAL REPUBLICAN SENATORIAL COMMITTEE

M.U.R. 820

AFFIDAVIT

City of Washington  
District of Columbia

Rodney A. Smith, being duly sworn deposes and says:

I

That he is the duly appointed treasurer of the National Republican Senatorial Committee of 227 Massachusetts Avenue, N.E., Washington, D.C.

II

That as such treasurer he supervised and directed the making of contributions as allowed by law to Republican candidates for the office of United States Senate in the year 1978.

III

That in such capacity donations of cash (or in-kind) were made to James Martin for Senate (Sparkman seat) from July 11 through August 17th, 1978 in the amount of \$16,493.27 as is shown in our internal records, a copy of which is attached as Exhibit A.

79040152380

IV

That in such capacity donations of cash in the amount of \$17,000 were made to James Martin for Senate (Allen seat) on October 6th and an in-kind contribution of use of video equipment of \$300.00 made on/about October 26th as is shown by our internal records, a copy of which is attached as Exhibit B.

V

That he is informed and believes that such cash expenditures are allowed under the provisions of 2 U.S.C. Section 441a(h).

VI

That in such capacity he supervised and directed the expenditure of funds in behalf of James Martin for Senate (Sparkman seat), as authorized by 2 U.S.C. 441a(d) and as assigned to the National Republican Senatorial Committee by Republican National Committee. Said expenditures in behalf of James Martin for Senate (Sparkman seat) are shown in the attached Exhibit C.

VII

That in such capacity he supervised and directed the expenditure of funds in behalf of James Martin for Senate (Allen seat) as authorized by 2 U.S.C. 441a(d) and as assigned to the National Republican Senatorial Committee by the Republican National Committee. Said expenditures in behalf of James Martin for Senate (Allen seat) are shown in the attached Exhibit D. As shown in said Exhibits C and D, a credit for funds or materials transferred from James Martin for Senate (Sparkman seat) to James Martin for Senate (Allen seat) in the amount of \$28,458.63 was made on October 2, 1978.

79040152381

VIII

That he is informed and believes that such agency agreements are proper and correct and that the same were in accordance with Commission Regulations # 110.7 and Advisory Opinion 1976-108.

IX

That he supervised and directed the expenditures for James Martin for Senate (Sparkman seat) and James Martin for Senate (Allen seat) as were assigned by allocation agreements from the Alabama (State) Republican Executive Committee, such expenditures being shown on the aforesaid Exhibits C and D.

X

That he is informed and believes that all such transactions were made properly and in accordance with Commission Advisory Opinion 1978-19 "Contributions to Two Campaigns by One Candidate" made in connection with the Fraser for Senate Campaigns, and that the Martin Campaigns are indistinguishable in all material aspects from said Fraser situation.

XI


That in order to make sure that all proper credits were made for cash or credits transferred from the Martin Committee (Sparkman seat) to the Martin Committee (Allen seat), the National Republican Senatorial Committee required a certified public accountant to make

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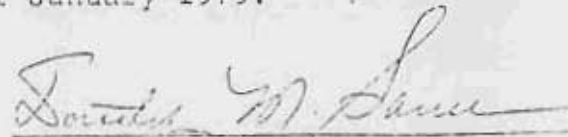
an on-site review of credits of cash and in-kind contributions transferred from the first committee to the second.

XII

Further deponent saith not.

  
Rodney A. Smith  
Treasurer, National Republican  
Senatorial Committee

Sworn to and subscribed before me a notary public in and for the District of Columbia this 11 day of January 1979.

  
Notary Public  
My commission expires 5-31-83

79040152383



Candidate: Tim Martin

DATE	DESCRIPTION	R.S.C. CK No	RNC-ESC. Sect. 401 EXPENDED	CONTRIBUTION BALANCE
	LEGAL LIMIT			17,500.
7 11		TRUST ACCOUNT	x 5,000.- ✓	12,500.
7 25	Harris Family Co A.C.	TRUST ACCOUNT	x 2,500.- ✓	10,000.
7 19	Travel from Dallas		x 137.- x	9,863.
8 4	Contributions	TRUST ACCOUNT	x 9,000.- ✓	1,703.
8 27	Contribution	TRUST	x 5,796.27 ✓	1,006.73

EXHIBIT A

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RSC PNC-RSC SECT. 441 CONTRIBUTION  
 CK. Expended Balance  
 No.

DATE

DESCRIPTION

Local Unit

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10 6 Local Unit Town 17 500

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10 26 W. of Vidler Exp. 17 500

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EXHIBIT B

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Candidate: Jim MARTIN

DATE	DESCRIPTION	RSC	SECTION	EXPENDITURES		BALANCE
		CK	NATIONAL	STATE	BALANCE	
		No.	Extended	Balance	Extended	Balance
1	LEAVE LIMIT	11-11-80	62500	62500	62500	62500
2	9 1 Merrill Lynch				25000	
3	9 14 Merrill Lynch				25000	
4	9 29 Plain Road					10000
5	10 10 1111 1111 1111 1111 1111			25457.63		
6	7 19 John H. Fogarty			20000		
7	10 6 1111 1111 1111			(13705.2)		38129.15

EXHIBIT C

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DATE	DESCRIPTION	RSC	SECTION 441 EXPENDITURES	
		CK No.	NATIONAL	STATE
			Extended Balance	Extended Balance
	Level Limit Purchase Price		625.00	625.00
10 2	Transfer of fund		20450.30	
10 1	11 1/2 ...			6800.00
	65,000 ...		2641.37	2000
10 10	10 10 ...		41.37	5200.00
10 10	10 10 ...		226.67	

7930152337

Notes: ...

EXHIBIT D





FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. James F. Schoener  
Jenkins, Nystrom & Sterlacci, P.C.  
2033 M Street, N. W.  
Washington, D. C. 20036

Re: MUR 820

Dear Mr. Schoener:

The Commission is continuing its investigation in the above-referenced matter. In this regard, the Commission, on June , 1979, found reason to believe that the National Republican Senatorial Committee

1: may have violated 2 U.S.C. § 434 by reporting expenditures made in connection with the Alabama Senatorial primary, and one said expenditure made prior to the time NRSC was the designated agent of RNC, as coordinated expenditures under 2 U.S.C. § 441a(d), 11 C.F.R. § 110.7(a)(4);

2: may have violated 2 U.S.C. § 441a(h) by making contributions to James Martin of Alabama during calendar year 1978 in excess of the limitations of that provision of the Act.

Attached is a set of interrogatories, answers to which will assist the Commission in resolving this matter. The interrogatories relate to the fact that NRSC has reported two expenditures, one of \$3,000 on July 19, 1978, and one of \$25,000 on September 1, 1978, as § 441a(d) coordinated expenditures. The Alabama primary was held on September 5, 1978 and the date of the first letter of authorization from the RNC was

Mr. James F. Schoener  
Page Two

September 5, 1978. In addition, the Commission is seeking further facts relating to the \$50,000 expenditure made on October 2, 1978, part of which was allocated to the Sparkman Senate seat campaign and part to the Allen Senate seat campaign.

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 feel are relevant to the Commission's analysis of these matters. Additionally, please answer the attached Interrogatories and return them to the Commission within ten (10) days of your receipt of this letter. The attorney assigned to this matter is Kathleen Imig Perkins, (202)523-4175. Please contact Ms. Perkins if you have any questions concerning MUR 820.

Sincerely,

William C. Oldaker  
General Counsel

Enclosures

INTERROGATORIES - SCHOENER - MUR 820

1. State the purpose of NRSC's expenditure of \$3,000 on July 19, 1978, reported as a §441a(d) coordinated expenditure in connection with the Alabama general election campaign of James Martin for U.S. Senate.
2. How was this expenditure related to the general election when the Alabama primary was not held until September 5, 1978 and the runoff was not held until September 26, 1978? Was NRSC the designated agent of RNC (for the purpose of §441a(d) expenditures) as of July 19, 1978?
3. State the purpose of NRSC's expenditure of \$25,000 on September 1, 1978, reported as a §441a(d) coordinated expenditure in connection with the Alabama general election campaign of James Martin for U.S. Senate.
4. Relate this expenditure to the general election.
5. State the purpose of the expenditure made by NRSC on October 2, 1978 in the amount of \$50,000.
6. What method was utilized to allocate part of this expenditure to the Martin S<sub>1</sub> campaign and part to the S<sub>2</sub> campaign.
7. Were any media materials, developed using S<sub>1</sub> NRSC coordinated expenditures, utilized in the S<sub>2</sub> campaign? If so, was an amount allocated to S<sub>2</sub> for purchase of said materials?
8. Please submit any materials or documentation in support of your answers to the above questions.

790152390



Several Senators addressed the Chair. Mr. GRIFFIN. Mr. President, I send an amendment to the desk.

The VICE PRESIDENT. The clerk will report.

The assistant legislative clerk proceeded to read the amendment.

Mr. GRIFFIN. Mr. President, I ask unanimous consent that further reading of the amendment be dispensed with.

The VICE PRESIDENT. Without objection, it is so ordered.

(Pursuant to an order entered later in today's proceedings, Mr. GRIFFIN's second amendment in the nature of a substitute is not printed in the Record.)

Mr. GRIFFIN. I would like to explain this amendment.

Mr. CANNON. Does the Senator have a copy, Mr. President?

Mr. GRIFFIN. We will get some Xeroxed copies made for the chairman and others.

I will tell the Senate this is another substitute, and in this case the Packwood amendment, which is a very meritorious amendment, one of the most important amendments that we have ever adopted around here, but realizing that it is controversial and we lose votes because it is in the substitute, has been eliminated. But the Chiles amendment has been included.

This substitute includes the Chiles amendment, and it also carries the amendment of the Senator from Arizona with regard to honoraria, and we would just like to call the roll again.

Mr. TAFT. Mr. President, will the Senator yield?

Mr. GRIFFIN. I yield.

Mr. TAFT. I wonder if it also contains the amendment of the Senator from Ohio?

Mr. GRIFFIN. I will have to admit it does not at this point. Of course, it is amendable.

Mr. President, I suggest the absence of a quorum.

Mr. CANNON. Mr. President, I would like to see a copy of the amendment.

Mr. GRIFFIN. I suggest the absence of a quorum.

The VICE PRESIDENT. The clerk will call the roll.

The assistant legislative clerk proceeded to call the roll.

Mr. JOHNSTON. Mr. President, I ask unanimous consent that the order for the quorum call be rescinded.

The VICE PRESIDENT. Without objection, it is so ordered.

Mr. JOHNSTON. Mr. President, I have an amendment which I send to the desk.

The VICE PRESIDENT. The clerk will state the amendment.

The assistant legislative clerk proceeded to read the amendment.

Mr. JOHNSTON. Mr. President, I ask unanimous consent that further reading of the amendment be dispensed with.

Mr. CLARK. I object.

The VICE PRESIDENT. Objection is heard. The clerk will read the amendment.

The assistant legislative clerk read as follows:

Amendment to Line 23 of Page 27 of S3065, amending Section 320(a)(2) of the bill, as follows:

After "exceed \$5,000," add "except that the Republican or Democratic Senatorial Campaign Committee, the Democratic National Congressional Committee, the National Republican Congressional Committee, or the national committee of a political party may contribute at any time amounts not exceeding \$20,000 to candidates for Congress with respect to any or all of the elections in which such candidates seek office during an election year."

Mr. JOHNSTON. Mr. President, this amendment is submitted on behalf of myself, Senator BENSSEN, who is a former chairman of our Democratic Senatorial Campaign Committee, as well as Senator STEVENS, the chairman of the Republican Senatorial Campaign Committee.

What it does is simply this: It increases to \$20,000 per year for elections that the committee may give to any candidate. Under the present law the committee, the Senatorial, Democratic or Republican, Committee may give \$5,000 per election, election including the primary, runoff, and general election, or \$15,000 for candidates who have all three elections.

What this amendment does is simply say that that amount is increased to \$20,000 is not made dependent upon whether they are primaries, runoffs, or general elections.

Mr. President, the whole thrust, the whole reason, for this campaign law is to do away, insofar as we can, with what you might call committed money—some call it dirty money, money with strings, money where there is some quid pro quo, express or implied, for the contribution.

So, Mr. President, this amendment increases the amount which you can get from the one source, that is, your Senatorial Campaign Committees or your national committees, for which there is no quid pro quo.

As a matter of fact, I daresay the average Senator in this body does not even know where the contributions come to for the Senatorial Campaign Committees. In the case of the Democratic Committee we do not pass around the list. Some Senators do not even secure contributions, but they all get contributions on a parity basis.

It seems to me, Mr. President, we ought to make it as easy as possible within reason to allow these contributions to be made in reasonable amounts when we know they are not going to be based on any semblance of any promise, expressed or implied.

I hope the manager can go along with this. It has bipartisan support. Frankly, Mr. President, I see no conceivable objection.

I ask for the adoption of this amendment.

Mr. CLARK. Mr. President, when this bill was originally drawn 2 years ago we, of course, had a very extensive debate here about whether or not all committees ought to be limited to \$5,000 or whether we were going to create a special loophole a special situation, a special condition, for our own.

That is really what the issue here is. Are we going to say that labor committees and business committees and so-called good government committees, and all other committees, are limited to \$5,

000, but when it comes to us that does not apply to the committees that contributes to us and to us only?

In those cases, if we are to adopt this amendment, we would find ourselves giving ourselves \$20,000.

The absolute contribution limitation on the Democratic National Committee, the State committees, county committees, every other committee, is \$5,000. If we adopt this amendment, we are saying that that would apply to all but our own in-house committees.

The great problem with this amendment is that because we wanted to keep the party strong, we have said that an individual may contribute to a party committee, the national committee, or the Democratic or Republican senatorial committees and congressional committees, not just \$5,000, but \$25,000.

I think that is perhaps overly generous, but it is in the bill and in the law. Any individual may contribute to the congressional campaign committees and senatorial campaign committees up to \$25,000. If we are going to allow \$20,000 to go to a candidate, that means we really open up and invite the possibility of earmarking. At least, we make it extremely difficult to enforce the law against earmarking because then we have a way to pass at least \$20,000 out of an individual and into the hands of a House or Senate Member.

Mr. JOHNSTON. Will the Senator yield at that point?

Mr. CLARK. I do yield.

Mr. JOHNSTON. The Senator is aware that there is a specific law which prohibits the earmarking?

Mr. CLARK. Yes.

Mr. JOHNSTON. If someone, expressly or by implication, earmarks, then it is the duty of the committee to so note that earmarking and it is the duty of the candidate to report that as if it were a direct contribution from the original donor and the final donee, the Senator is aware of that?

Mr. CLARK. Yes, that is why I was very careful in saying that it obviously makes it hard to enforce the earmarking law. The earmarking law is the law the Senator just described. Of course, if one can identify someone who said, "We want this \$20,000 to go to that candidate," it is against the law.

But we have to be very concerned in the process of passing this legislation that we do not invite difficulties in the enforcement of this law. I think this would do so.

Mr. JOHNSTON. The Senator is not suggesting that the chairman or the committees of this Congress would be party to circumventing that law, either expressly or impliedly?

Mr. CLARK. No.

Mr. JOHNSTON. The Senator surely is not doing that.

Mr. CLARK. No. But obviously, not every dollar that comes in to the campaign committee goes through the chairman, is seen by him and passed on by him.

Mr. JOHNSTON. Oh, yes, it is. I beg to disagree.

The PRESIDING OFFICER (Mr. GARN). If the Senator will yield, I ad-

vide the Senator from Louisiana that his amendment is not in order. Line 23 has already been deleted from the bill.

Mr. JOHNSTON. Mr. President, I would, therefore, move to amend my amendment by striking the words "after exceed \$5,000 add" and in lieu thereof insert the following "notwithstanding any other provision of this act".

I also want to strike "except that" and put the quotes in front of "the." So, therefore, it would read as follows:

Notwithstanding any other provision of this Act "the Republican or Democratic Senatorial Campaign Committee"

Et cetera.

The PRESIDING OFFICER. The question remains, where does the Senator wish the amendment to come in the bill?

Mr. JOHNSTON. At the appropriate place.

The PRESIDING OFFICER. The amendment is so modified.

The amendment, as modified, is as follows:

At the appropriate place in the bill insert the following: "Notwithstanding any other provision of this Act the Republican or Democratic Senatorial Campaign Committee, the Democratic National Congressional Committee, the National Republican Congressional Committee, or the national committee of a political party may contribute at any time amounts not exceeding \$20,000 to candidates for Congress with respect to any or all of the elections in which such candidates seek office during an election year."

Mr. JOHNSTON. As I was saying to the Senator, if I recall the question, earmarking is totally impossible, and I am sure this applies with equal force to the Republican committee as it does with the Democratic committee.

Not one cent goes out to a political candidate. I know this is true. It was true when Senator BENTSEN was chairman of the committee. It is true when I am chairman of the committee.

Not one cent goes out that is not signed by the chairman, cosigned by the executive council and distributed under a plan generally perfected by the committee.

Mr. CLARK. If I understand the Senator's statement, every cent of money that is taken into the committee is personally received by him, and if there were any conditions assigned to that, he would be aware of it?

Mr. JOHNSTON. No. Every cent that goes out.

Mr. CLARK. That goes out?

Mr. JOHNSTON. That is right.

Mr. CLARK. But not that comes in?

Mr. JOHNSTON. It is illegal to accept under conditions—unless they are earmarked, and that is so stated.

Mr. CLARK. Right.

Mr. JOHNSTON. It does not go out without the chairman actually signing the check.

Mr. CLARK. I understand.

Mr. JOHNSTON. So that it is impossible for a staffer, for example, to receive some money and understand the conditions and send it out of the committee. It comes through as it should, as it must, through the chairman.

Mr. CLARK. Let me try to explain more specifically with regard to this point that I do not think we ought to set up a different standard for the senatorial and congressional campaign committees than we set up for any other committee.

Particularly, I do not think we ought to set up a different level of contribution. There was a good deal of debate here a little while ago on the Chiles amendment about how much faith people have lost in the system, how people believe big money corrupts and that special interests money corrupts.

Now the senatorial and congressional campaign committees can receive money exactly the same way, and from the same kind of sources as any other committee may.

There is no restriction where they can take money.

I would argue that for us then to create a special category—every committee in America can spend so much except one committee, our committee—it is only going to cause greater cynicism, and justifiably so, from the American electorate.

Mr. JOHNSTON. I say to my distinguished friend that precisely the opposite results come from this committee.

Surely the Senator cannot compare a Democratic committee or a Republican committee to a labor committee or a business committee or any special interest.

Mr. CLARK. Why not?

Mr. JOHNSTON. Because we have no public interest, other than the party interest.

Mr. CLARK. The Senator is going to take contributions from labor for the committee, is he not? It is exactly the same dollar—from business as well—whether for Republican or Democrat.

The Senator makes no restriction on where that money comes from.

Mr. JOHNSTON. But it is comingled in a common pot and given out without strings.

That is the key, and that is the reason for this amendment.

If we assume a certain amount of money is essential in a campaign, and I think that is a safe assumption, then if we cannot get it from the committee, we get it directly from the special interest group, and is this not much better than getting it from the special interest?

Mr. CLARK. Is the Senator saying the campaign committees handle money that is somehow purified as compared to the Democratic National Committee or the Republican National Committee or the State committees?

Mr. JOHNSTON. This amendment is applicable to the Republican National Committee and the Democratic National Committee and, yes, that is precisely what I am saying. It is purified because to the extent that there is any express or implied strings on the money, or the appearance of strings on the money, then those strings are cut by going through this committee.

Mr. CLARK. Maybe I misunderstood the Senator's amendment.

Mr. JOHNSTON. Apparently, what?

Mr. CLARK. There are no copies of the amendment available.

Mr. JOHNSTON. I gave the Senator a copy earlier, as a matter of fact.

Mr. CLARK. It says:

Except that the Republican or Democratic Senatorial Campaign Committee, the Democratic National Congressional Committee, the National Republican Congressional Committee, or the national committee of a political party may contribute at any time amounts not exceeding \$20,000 to candidates for Congress with respect to any or all of the elections in which such candidates seek office during an election year.

What is being said is that every committee in America is limited to \$5,000, except the senatorial and congressional campaign committees and the national committees.

Mr. JOHNSTON. That is precisely correct.

Mr. CLARK. Mr. President, I would like to say that what we are doing now is saying to the Democratic National Committee, "You cannot only give \$5,000 under the present law, you can spend 2 cents a voter for every voter in a State, with a minimum of \$20,000, on behalf of a candidate. So you can spend \$5,000 now plus \$20,000 or 2 cents a voter, whichever is more. Now we are going to lift that limit of \$5,000 all the way to \$20,000."

That means the Democratic National Committee and the Republican National Committee can now contribute a minimum of \$40,000 to any candidate in Congress. Apparently, according to the amendment, it could not do that for the President. He would be restricted to \$5,000. But Senators and Congressmen would be allowed \$20,000 in direct cash and a minimum of \$20,000 in expenditures on their behalf. That is now a \$40,000 minimum limitation that can be either given directly or spent on their behalf.

Am I interpreting the amendment correctly?

Mr. JOHNSTON. This amendment simply changes from an aggregate of \$15,000 to an aggregate of \$20,000 that a candidate may get directly from these committees. It does not change in any way what he may get otherwise. Right now, as I understand the law, a candidate may have expenditures made on his behalf by the national committee to the extent of \$20,000 and he may have spent on his behalf by the Congressional Committee \$15,000, assuming he has a primary, a runoff and a general election. All this changes is that \$15,000 provision to a \$20,000 provision, and it takes over the requirement that there are three elections. In other words, they may get \$20,000 even if they only have a general election.

I would suggest to the Senator we are not changing it to allow the \$40,000 but simply changing it from the \$15,000 to the \$20,000. If a candidate were so lucky to get the full \$40,000, and I submit that is going to be very rare indeed, what is wrong with that? Is it not better for him to get that money, which I submit is purified, rather than get it directly from the special interest group, directly from the labor group or directly from the business group?

Mr. CLARK. I must say that I do not



share the Senator's view that somehow the money that goes through the Senatorial Campaign Committee or the Congressional Campaign Committee is as pure as the driven snow, and the money that comes from individuals who participate in labor is tainted or business money is tainted.

Mr. JOHNSTON. It is not that it is tainted. It is that they have a special point of view and they give their money to promote candidates who share that point of view.

Mr. CLARK. I assume if that were the only criterion, the Democratic Committee gives it to candidates that share their view and the Republicans give it to candidates that share their view.

Mr. JOHNSTON. No, that is not so, because any member of the Democratic Caucus, regardless of his view, even if at times it strays from the majority, is entitled to his share of the money.

Mr. CLARK. But it is a Democratic view. They are not giving money to anybody but Democrats or they are not giving money to anybody but Republicans.

Mr. JOHNSTON. That may be so, but that, I submit, is under our system of government which, in effect, has enshrined the two-party system. That is permissible and that is the kind of taint, if the party puts a taint on money, that our system of government envisions and endorses and has run on traditionally. No one out there in America can say because a party gives someone money that there is anything wrong with that. That is traditional American politics.

Mr. CLARK. I think what the amendment does and what it says is quite clear. I would like the Senator from Louisiana to correct me if I am wrong. Every single committee in the United States that falls under this law would have a \$5,000 limitation on the amount that they can contribute, with two exceptions carved out by this amendment: The national committees of the two major parties and the congressional and senatorial committees of the two major parties. In those cases they would be allowed to give \$20,000 in direct cash plus, in accordance with the present law, the national party committees would be allowed to spend a minimum of \$20,000 on their behalf.

That means that we are going to arrive at a conclusion where the two national committees can now spend an aggregate of \$40,000, \$20,000 indirect and \$20,000 direct, \$40,000 minimum. In those States where two cents a voter amounts to more than \$20,000, they would be able to spend in excess of that.

Mr. JOHNSTON. Will the Senator yield for a question?

Mr. CLARK. Yes.

Mr. JOHNSTON. How much can those sources now spend, assuming there is a primary, a runoff, and a general election?

Mr. CLARK. First of all, let us assume that the primary, runoff, and general election do not occur in at least half of the races in America. We have never had a runoff, to my knowledge, in any place in my part of the country. I do not think one can assume that one automatically gets \$5,000 in three elections. I think on the average there will be two elections, and on some occasions three elections.

That is direct money. What the Senator is suggesting is that in those cases where there is a primary and a general election we would be able to double that to \$20,000. I think it only means the introduction of bigger money into politics and greater cynicism about it, particularly when we are doing it for ourselves, particularly when we are doing it to our own committees.

As I say, we debated this at length 2 years ago. Maybe the Senate feels differently about it now, but I feel very strongly that if we were to say that our committees ought to be different, that we ought to be able to give \$20,000 instead of \$5,000, we would come in for a great deal of justifiable criticism.

Mr. JOHNSTON. Mr. President, just one final word. I believe the amendment is well understood. I would like to simply point out that the \$20,000 the National Committee may now spend on behalf of a candidate is not inserted by this amendment. That is not changed by this amendment. All this amendment does is increase basically for the senatorial campaign committees from an aggregate of \$15,000 in case there are the three elections to a total of \$20,000 for however many elections there are.

I submit that when we say we are doing it for ourselves, what we mean is that we are doing it for any candidate for national office, whether he be a congressional candidate or a senatorial candidate. In that sense, this is not a club amendment, if one wants to call it that. It is not for incumbents; it is for any candidate that the committee may give money to.

Mr. ALLEN. Will the Senator yield?

Mr. JOHNSTON. Yes, I will yield.

Mr. ALLEN. This would cover primaries and run-off primaries as well, would it not?

Mr. JOHNSTON. That is correct. Under the present law, the campaign committee can give \$5,000 for the primary, \$5,000 in a run-off, and then another \$5,000 in the general election, which is a total of \$15,000. What this would allow is to give the committee some flexibility. If the Senator's tough race is the general, he could withhold the whole \$20,000 until that time.

Mr. ALLEN. How often do either of the committees contribute to a challenger of an incumbent?

Mr. JOHNSTON. In the case of the Democratic Committee that is not done.

Mr. ALLEN. In other words, this, then, is just for the benefit of incumbents; is that not right?

Mr. JOHNSTON. It would also apply to the challengers. I mean in those cases where an incumbent is beaten and a new incumbent is elected.

Mr. ALLEN. That is right; in other words, in general elections. But through the primaries, first and second, it would be the incumbent who was taken care of. I have no objection to taking care of incumbents, but—

Mr. JOHNSTON. Except in cases where you have no incumbents, as in the case of retirees.

Mr. ALLEN. But where there is an incumbent, there would be no impediment

to any incumbent receiving funds, in the general election or primary, either one.

Mr. JOHNSTON. The Senator is correct in the point he makes, in the sense that that is the standard operating procedure under which we have operated, and I see no movement to change it. But the Senator is correct in the point he makes.

Mr. ALLEN. I just want us to understand what we are voting on. As long as the incumbent is in the picture, he is the one who gets the benefit of the increased amount.

Mr. JOHNSTON. Not just the incumbent.

Mr. ALLEN. I say, as long as the incumbent is in the picture, though, he would be the one to really benefit.

Mr. TAFT. Mr. President, will the Senator yield?

Mr. JOHNSTON. I yield to the Senator from Ohio.

Mr. ALLEN. But is that not true?

Mr. JOHNSTON. Yes; the Senator is correct.

Mr. TAFT. Is it not true that that depends upon what the committee involved desired to do? If the committee involved desired to make other rules, it could make other rules as to the distribution of those donations.

Mr. JOHNSTON. That is correct. There is no rule that specifies how a national committee or a senatorial committee is going to spend its money.

Mr. TAFT. Well, the Senator is not entirely correct. The Republican senatorial committee does have certain rules.

Mr. JOHNSTON. Well, yes.

Mr. CLARK. Mr. President, will the Senator yield?

Mr. JOHNSTON. I yield.

Mr. CLARK. I would like to ask the Senator if his amendment would allow the national committee to give more money to a Presidential campaign. Does it increase the limit that may be given to a Presidential candidate?

Mr. JOHNSTON. I do not believe so. It is not intended to, and I do not believe that the phraseology is subject to that interpretation.

Mr. CLARK. That is the way I would interpret it. Therefore, I wonder if this would not be interpreted, and quite accurately, as an amendment aimed only at helping Senators and Members of Congress. The Senator seeks to permit those national committees to give us more, but not the President more. We are not raising the amount the national committee can give to a President; that remains the same.

Mr. JOHNSTON. That is correct.

Mr. CLARK. So it seems to me all we are doing is saying we want to funnel a lot more money into Senate and congressional campaigns through giving the national committee a separate contribution limitation, and the same with the campaign committees. I do not see how it could be interpreted except that way, as a means of getting more money into our own congressional campaigns.

I think, as the Senator from Alabama has emphasized, it is merely a means of

elling more money into an incumbent's campaign, because this amendment does favor incumbents. For all those reasons, Mr. President, I hope the Senate will not adopt this amendment, because I think if we open up the flood gates and say this committee ought to go from \$5,000 to \$20,000, we will have a very difficult time in saying that State committees, county committees, and other committees ought not to be able to do that. Then we will not have a \$5,000 limitation on committees, but a \$20,000 limitation. After all, how does one justify increasing from \$5,000 to \$20,000 for national committees and not State committees?

Mr. JOHNSTON. Mr. President, will the Senator yield at that point so that I may ask for the yeas and nays?

Mr. CLARK. Yes.

Mr. JOHNSTON. Mr. President, I ask for the yeas and nays.

The ACTING PRESIDENT pro tempore (Mr. HANSEN). Is there a sufficient second? There is a sufficient second.

The yeas and nays were ordered.

Mr. JOHNSTON. I thank the Senator.

Mr. CLARK. Mr. President, I am prepared to yield back the remainder of my time.

Mr. JOHNSTON. I yield back the remainder of my time.

The ACTING PRESIDENT pro tempore. All remaining time having been yielded back, the question is on agreeing to the amendment of the Senator from Louisiana (Mr. JOHNSTON). On this question, the yeas and nays have been ordered, and the clerk will call the roll.

The legislative clerk called the roll.

Mr. ROBERT C. BYRD. I announce that the Senator from Idaho (Mr. CHURCH), the Senator from Indiana (Mr. HANSEN), and the Senator from Washington (Mr. JACKSON) are necessarily absent.

I further announce that, if present and voting, the Senator from Washington (Mr. JACKSON) would vote "yea."

Mr. GRIFFIN. I announce that the Senator from North Carolina (Mr. HELMS) and the Senator from North Dakota (Mr. YOUNG) are necessarily absent.

I further announce that the Senator from Vermont (Mr. STAFFORD) is absent due to illness.

I further announce that, if present and voting, the Senator from North Carolina (Mr. HELMS) would vote "yea."

The result was announced—yeas 64, nays 30, as follows:

[Rollcall Vote No. 85 Leg.]

YEAS—64

Baker	Griffin	Pastore
Bartlett	Hansen	Pell
Bach	Haskell	Perry
Beilmon	Hathfield	Proxmire
Bentzen	Hathaway	Randolph
Buckley	Hruska	Ribicoff
Byrd, Robert C.	Huddleston	Schweiker
Cannon	Humphrey	Scott, Hugh
Case	Inouye	Scott
Cranston	Johnston	William L.
Curtis	Laxalt	Sparkman
Dole	Leahy	Stennis
Donohoe	Long	Stevens
Easton	Magnuson	Symington
Eastland	Mansfield	Taft
Fannin	McClellan	Talmadge
Ford	McClure	Thurmond
Gale	McGee	Tower
Gandy	Montoya	Tunney
Glenn	Muskie	Weicker
Goldwater	Nelson	Williams
Gravel	Parkwood	

NAYS—30

Abourezk	Clark	Metzler
Allen	Culver	Montale
Beall	Durkin	Morgan
Biden	Hart, Gary	Moss
Brock	Hart, Philip A.	Nease
Brooke	Hollings	Pearson
Bumpers	Javits	Roth
Burdick	Kennedy	Stevenson
Byrd	Mathias	Strom
Chiles	McGovern	
	McIntyre	

NOT VOTING—0

Church	Helms	Stafford
Harkin	Jackson	Young

So Mr. JOHNSTON's amendment was agreed to.

Mr. CANNON. The President, I move to reconsider the vote by which the amendment was agreed to.

Mr. TAFT. I move to lay that on the table.

The motion to lay on the table was agreed to.

Mr. TAFT. Mr. President, I send to the desk an amendment to the pending substitute by Mr. GRIFFIN.

The PRESIDING OFFICER. The amendment will be stated.

The second assistant legislative clerk proceeded to read the amendment.

Mr. TAFT. I ask unanimous consent that further reading of the amendment be dispensed with.

The PRESIDING OFFICER. Without objection, it is so ordered.

The amendment is as follows:

On page 1, in subsection (c)(1) after the word "ballot", add the following: "or certifies to the Commission that he will not be an active candidate in the primary".

At the end of subsection (c)(1) add the following new sentence: "The provisions of this section shall apply as of the date of enactment."

Mr. TAFT. This is an amendment that had already passed on the first Griffin substitute and on the bill itself. I am attempting now to put it into the second Griffin substitute. As the Members of the Senate who were here will recall, the amendment relates to a limitation on the payout share to the Presidential candidates. It eliminates candidates who, for two consecutive primaries, have under 10 percent of the vote in those primaries, with the provision that Senator BAYH asked to be included, to the effect that if a candidate wishes to certify that he is not an active candidate, this will not count against him in that primary so far as elimination is concerned. I know of no objection to it. It went through by a voice vote originally.

Mr. CANNON. Mr. President, do I understand correctly that this is the same amendment to decertify Presidential candidates provided that they do not get a certain percent of the votes in the primary, and this is the amendment that was offered before to S. 3065 and also to the previous Griffin substitute?

Mr. TAFT. The Senator is entirely correct.

Mr. CANNON. Mr. President, I am willing to accept the amendment. I think it is a good amendment.

The PRESIDING OFFICER. The question is on agreeing to the amendment.

The amendment was agreed to.

Mr. CRANSTON. Mr. President, I send an amendment to the desk and ask for its immediate consideration.

Mr. MANSFIELD. Mr. President, will the Senator yield?  
Mr. CRANSTON. Certainly.

MODIFICATION OF ORDER TO REPORT SENATE RESOLUTION 400

Mr. MANSFIELD. If I may have the attention of the Senate, I ask unanimous consent that the order of the Senate mandating the Senate Rules Committee to report Senate Resolution 400 establishing a Standing Committee on Intelligence Activities on March 20, 1976, be modified as follows:

Senate Resolution 400 be reported forthwith from the Committee on Rules and immediately be referred simultaneously to the Committee on the Judiciary and to the Committee on Rules;

That the Committee on the Judiciary make its recommendations on Senate Resolution 400 not later than the close of business on March 29, 1976 and that the recommendations of the Committee on the Judiciary be referred without further action by the Senate to the Committee on Rules; and

That the Rules Committee report its final recommendations not later than April 5, 1976.

Mr. JAVITS. Mr. President, may I inquire—

Mr. MANSFIELD. This has been cleared.

Mr. JAVITS. Mr. President, I just wanted to know that, because I happen to be the only ranking member of the Committee on Government Operations here.

Mr. MANSFIELD. I looked for the Senator, but he was not available. He was in a hearing.

Mr. JAVITS. I understand.  
Mr. MANSFIELD. I cleared it with Senators CANNON, HATFIELD, EASTLAND, TUNNEY, HART, BYRD, HRUSKA, RIBICOFF, and SCOTT.

Mr. JAVITS. Has it been cleared with Mr. PERCY, the ranking member?

Mr. MANSFIELD. I shall trust the Senator from New York to get him.

Mr. JAVITS. I shall not object. I just wanted to know that.

Mr. MANSFIELD. I thank the Senator.

FEDERAL ELECTION CAMPAIGN ACT AMENDMENTS OF 1976

The Senate continued with the consideration of the bill (S. 3065) to amend the Federal Election Campaign Act of 1971 to provide for its administration by a Federal Election Commission appointed in accordance with the requirements of the Constitution, and for other purposes.

Mr. CRANSTON. I yield to the Senator from Oklahoma for a unanimous-consent request.

Mr. BARTLETT. I ask unanimous consent that Don Cogman of my staff be accorded privileges of the floor during consideration of this measure.

The PRESIDING OFFICER. Without objection, it is so ordered.

Mr. CRANSTON. I send an amendment to the desk and ask for its consideration.

The PRESIDING OFFICER. The amendment will be stated.

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societies devoted to fostering the exploration of space through space science and the development of space technology and space law; and

Whereas the International Astronautical Federation and its affiliated organizations, the International Academy of Astronautics and the International Institute of Space Law, represent the world's leading authorities in astronautics, the space sciences and space law; and

Whereas the International Astronautical Federation will hold its 27th Congress in Anaheim, California, during 1976, the Bicentennial Year of our Nation, in recognition of the vital contributions made by the United States to the scientific, technical and legal wealth of our civilization; and

Whereas the host organizations for this 27th Congress, to be called the "IAP '76" Congress, are the American Institute of Aeronautics and Astronautics, the American Astronautical Society, the Aerospace Medical Association, the New York Cardiological Society and the Rocket Research Institute, Inc.; and

Whereas the "IAP '76" Congress will be attended by hundreds of people who belong to the International Astronautical Federation's affiliated organizations and member societies from many nations; and

Whereas the "IAP '76" Congress will conduct sessions and present papers in all areas of astronautics, and the space sciences, and space law thereby advancing and strengthening international cooperation and understanding in these critical areas of science, technology, and law; and

Whereas the American Revolution Bicentennial Administration recognizes the "IAP '76" Congress as a significant contribution to the Horizon '76 theme of the national Bicentennial commemoration; and

Whereas the International Astronautical Federation, its affiliated organizations, and its member societies represent considerable hope and promise to the world for the continued advancement of man's accomplishments in the fields of astronautics, the space sciences, and space law, such accomplishments having brought a better life to all humanity; and

Whereas the International Astronautical Federation strongly supports man's exploration of space and the proper use of the environment of space in order to help fulfill man's greatest aspirations and meet his vital needs on earth; Now, therefore, be it

Resolved, That the Senate of the United States recognizes the importance of the 27th Congress of the International Astronautical Federation to be held in Anaheim, California, from October 10 through October 16, 1976; commends the International Astronautical Federation and its affiliated organizations for selecting the United States as the location for its 27th Congress in recognition of the Bicentennial of the United States; and commends the host organizations of the United States for sponsoring the Congress.

SEC. 2. The Secretary of the Senate shall transmit a suitably enshrined copy of this resolution to the International Astronautical Federation.

Mr. MOSS. I thank the Senator from Nevada for his kindness.

#### FEDERAL ELECTION CAMPAIGN ACT AMENDMENTS OF 1976

The Senate continued with the consideration of the bill (S. 3065) to amend the Federal Election Campaign Act of 1971 to provide for its administration by a Federal Election Commission appointed in accordance with the requirements of the Constitution, and for other purposes.

Mr. CANNON. Mr. President, what is the pending business?

The ACTING PRESIDENT pro tempore. The pending business is S. 3065.

AMENDMENT NO. 1518

Mr. CANNON. Mr. President, I call up my amendment in the form of a substitute to S. 3065.

The ACTING PRESIDENT pro tempore. The clerk will state the amendment.

The legislative clerk read as follows:

The Senator from Nevada (Mr. CANNON) for himself, Mr. HATFIELD, Mr. MANSFIELD, Mr. HUGH SCOTT, Mr. ROBERT C. BYRD and Mr. GRIFFIN proposes an amendment in the nature of a substitute numbered 1518.

Mr. CANNON. Mr. President, I ask unanimous consent that the reading of the substitute be dispensed with.

The ACTING PRESIDENT pro tempore. Without objection, it is so ordered. (The amendment is printed in the Record of March 23, 1976, pages S4066 through S4074.)

Mr. CANNON. Mr. President, yesterday afternoon an amendment in the form of a substitute to S. 3065 was introduced by myself, Senator HATFIELD, Senator MANSFIELD, Senator HUGH SCOTT, Senator ROBERT C. BYRD, and Senator GRIFFIN. This substitute represents an attempt by both sides of the aisles to set forth a reasonable compromise proposal which we can discuss and hopefully reach agreement on in the near future.

It is understood that there are a number of amendments to this substitute which will be proposed and considered by the Senate. At this time, however, I would like to set forth the changes and modifications which this substitute amendment would make to S. 3065 as it had been amended on the floor prior to yesterday.

The essential structure, and in many important respects, the substance of S. 3065 remains intact with the following modifications:

First of all, section 102 of S. 3065, creating an eight-member commission—the number of commissioners was expanded from six to eight by Senator MATTHIAS's amendment which was approved by the Senate—remains the same, with the deletion of the provision prohibiting outside business activities of commissioners and the deletion of the provision requiring in a majority vote of the commission that no less than two of the five-member majority be affiliated with the same political party.

In the definitional section 102 a provision was added excluding from the definition of expenditure for limitation purposes partisan activity designed to encourage individuals to register to vote, or to vote, conducted by the national committee of a political party, or a subordinate committee thereof, or the State committee of a national party. Such partisan activity would, however, be required to be reported. This addition had been approved by the Senate as an amendment to an earlier substitute but had not been proposed as an amendment to S. 3065. In addition, the substitute would delete a surplus definition of independent expenditure which is not used in the bill or the substitute as a defined term.

Section 104 of S. 3065 contained some

provisions related to reports by political committees and candidates, in particular the reporting requirement for independent expenditures. Here the substitute has included the reporting requirement proposed by Senator PACKWOOD for expenditures made by corporations' and labor organizations' communications to their stockholders or members expressly advocating the election or defeat of a clearly identified candidate. This reporting requirement has been expanded to equitably apply to all membership organizations requiring them to report expenditures directly attributable to such communications and for that reason has been transferred to the reporting sections of the act from the section which dealt only with corporations and labor organizations.

I might add here that I understand that there will be an amendment proposed to set forth a reasonable floor on such reports to the Commission to relieve the burden of such reporting on small businesses and membership organizations, as well as to clarify the nature of the expenditures which must be reported. I personally feel such an amendment would be an equitable and clarifying addition to this disclosure provision and intend to give it my strong support.

The portions of S. 3065 which relate to the general enforcement powers of the Commission which have been previously discussed on the floor remain intact. These are sections 106 and 108 of S. 3065 and the only change is a minor one to clarify that where a conciliation agreement, unless violated, constitutes an absolute bar to any further action by the Commission, it is a bar to further action with respect to the violation which is the subject of the agreement.

The substitute amendment deletes all the advisory opinion provisions of S. 3065. The effect of this is to retain existing law in section 437f of title 2, United States Code, exactly as it now is.

The substitute also would delete those provisions in S. 3065 relating to the House of Representatives procedure for considering the Commission's proposed rules and regulations, leaving this as a matter for the House to act upon at a later time.

The substitute does not make any changes in the section of S. 3065 relating to limitations on contributions and expenditures, as amended to date by the Senate, except in the following specific respects. First, a provision is added to provide for an unlimited transfer of funds between and among political committees of the same political party together with a provision to assure that the antiproliferation rule of S. 3065 would not apply to contributions by a political party through a national committee and to contributions by that party through a single State committee in each State. Second, the amendment to S. 3065 proposed by Senator JOHNSTON and previously adopted by the Senate is modified to clarify that contributions by the specified party committees do not aggregate more than \$20,000 in an election year.

This substitute also modifies the section of S. 3065 related to the solicitation

quest is to allow Senators who oppose this amendment to be notified so they can be present; is that correct?

Mr. PACKWOOD. That is correct.

Mr. ALLEN. I have no objection.

The PRESIDING OFFICER. Without objection, it is so ordered.

The Chair in his capacity as the Senator from Wisconsin suggests the absence of a quorum, and the clerk will call the roll.

The second assistant legislative clerk proceeded to call the roll.

Mr. JOHNSTON. Mr. President, I ask unanimous consent that the order for the quorum call be rescinded.

The PRESIDING OFFICER (Mr. NIXON). Without objection, it is so ordered.

Mr. JOHNSTON. Mr. President, I have an amendment which I send to the desk and ask for its immediate consideration.

The PRESIDING OFFICER. The amendment will be stated.

The legislative clerk read as follows:

On page 35, line 18, strike the words "or House of Representatives."

On page 35, beginning with line 21, strike the words "the Democratic National Congressional Committee, the National Republican Congressional Committee,".

Mr. JOHNSTON. Mr. President, a few days ago, I offered an amendment on behalf of myself, Senator STEVENS, and Senator BARTSEN, the effect of which would be to increase the amount which senatorial campaign committees and the House campaign committees could give to a candidate from \$5,000 per election to \$20,000 per year. After that amendment had passed—of course, we have intervened with this substitute bill, but, in the meantime, we have heard from our colleagues in the House, who tell us that making this applicable to the House committees would have the untoward and unwanted effect of raising expectations of House Members way beyond reality. They tell us that, whereas they may be able to give \$1,000 or \$2,000 per Member of Congress, with this kind of language, Members of Congress would come in expecting their \$20,000.

I do not know whether we are going to be able to approach anything close to those kinds of numbers on the Senate campaign committees. We shall have to wait to see how our respective fund-raising events come out to determine how successful we are in that respect. But the House people assure us that it is way beyond reality and it would have the very mischievous effect of disappointing many Members of the House. Accordingly, they asked to be deleted from the special treatment which our amendment of last week gave. All this amendment, therefore, does is excise the words "Congress" or "Democratic Congressional Committee" or "Republican Congressional Committee" from the amendment, which, in turn, makes the amendment, the \$20,000 limit, applicable only to the Senate committees and not to the House committees.

Mr. CANNON. Mr. President, that amendment is acceptable to me as the manager of the bill, on the basis that the Senator has stated it. I am willing to accept the amendment.

Mr. JOHNSTON. I thank my colleague. I ask for its consideration, Mr. President.

Mr. PACKWOOD. Mr. President, I have no objection to the amendment.

The PRESIDING OFFICER. The question is on agreeing to the amendment.

The amendment was agreed to.

Mr. CANNON. Mr. President, I suggest the absence of a quorum.

The PRESIDING OFFICER. The clerk will call the roll.

The second assistant legislative clerk proceeded to call the roll.

Mr. CANNON. Mr. President, I ask unanimous consent that the order for the quorum call be rescinded.

The PRESIDING OFFICER. Without objection, it is so ordered.

Mr. CLARK. Mr. President, I send to the desk an unprinted amendment and ask that it be read.

The PRESIDING OFFICER. The clerk will state the amendment.

The legislative clerk read as follows:

On page 25, between lines 4 and 5, insert the following:

PROHIBITION ON CONVERSION OF CONTRIBUTIONS TO PERSONAL USE

Sec. 107A. Section 317 of the Act (2 U.S.C. 439a), as redesignated by section 105, is amended by striking out "or may be used for any other lawful purpose," and inserting in lieu thereof the following: "may be contributed to him to the National committee or State committee of a political party, or returned by him to his contributors on a pro rata basis (as determined by the Commission), or contributed by him to another candidate."

Mr. CLARK. Mr. President, the purpose of this amendment clearly is simply to correct a flaw in the present law, which could, under certain circumstances, result in the conversion of excess campaign funds to personal use. This amendment would simply add a section whereby we would correct that.

I might say this amendment was suggested by Congressman BRAXLEY BROWN. I think it is a good one. We have talked to the manager of the bill and to other parties interested in this bill. What it would do, frankly, is to say that, in addition, if one has campaign contribution money left over, in addition to the two present ways in which that money can be disposed of—namely, to defray office expenses or to contribute to a charity—we are now providing three additional ways that the money can be disposed of without converting to personal use. Those are to contribute it to a State or National party committee, to contribute it to another candidate's committee, or to return it on a pro rata basis to the contributors.

We think this is important because we know historically that money has been converted from political committees to personal use if income tax is paid on it, and we would like to prevent that, and that is the purpose of the amendment, and I urge its adoption.

Mr. PACKWOOD. Mr. President, will the Senator from Iowa yield?

Mr. CLARK. I yield.

Mr. PACKWOOD. Do I understand from the Senator's amendment that at the moment a candidate would be pro-

hibited from giving this surplus to the National committee or a State committee?

Mr. CLARK. It is not clear whether they would be prevented under present law, but we would like to make it very clear, at any rate, that that would be permissible under the law.

Mr. PACKWOOD. Well, in that case, why strike out "for any other lawful purpose"? Why not add the Senator's amendment indicating this is a lawful purpose?

Mr. CLARK. Well, the reason we are striking "for any other lawful purpose" even though that phrase seems to us rather clearly to allow State and National committees to take funds is that we would like to make it possible in addition for them to return the money to their contributors as an alternative way of disposing of the money and to allow them to contribute to another candidate.

In other words, it is not at all clear that those other two methods we are now adding are permissible under the law presently.

Mr. PACKWOOD. I have no objection to the Senator's amendment, but I come back again why not simply leave in "for any other lawful purpose" and put in the Senator's definitions of lawful purpose, what that would include. What are we striking out when we strike out "or for any other lawful purpose"? What can a candidate now do with money that a candidate could not do with that stricken out?

Mr. CLARK. The point is under the present law it seems quite clear that a person can convert campaign funds to personal use if he pays income tax on it lawfully, and that is why we are striking that section and specifying the exact ways in which the money can be converted. In other words, it would leave the bill as it is under present law if we leave this phrase in, that candidates can indeed convert campaign funds for personal use.

Mr. PACKWOOD. What bothers me—and I agree with the Senator that they should not be converted to personal use—is what might be any other lawful purpose we are thinking of that is not conversion to personal use that we are striking out by striking out that phrase?

Mr. CLARK. Well, we are not aware of any other purpose for which campaign funds, in our judgment, ought to be used.

Mr. PACKWOOD. Mr. President, will the Senator withhold his amendment then and let me try to draft an amendment because I agree with the Senator about conversion, but I would like to make sure that we limit it to that purpose.

When we legislate on the floor, things come up that we do not think about, and I would not want us to trap a member, unconsciously trap a member, of the House or of the Senate who is now spending it for a lawful conversion and which that amendment might strike out.

Mr. CLARK. I would be happy to consult with the Senator.

Mr. President, I request that my amendment be withdrawn.



It is therefore grossly misleading to suggest that the inclusion in this bill of provisions clarifying the political activities permitted to corporations and labor unions is an attempt to "change the rules" in midstream.

On the contrary, what the conference committee has done is to restore the rules which governed Federal elections from 1971 until the Commission's Sun Oil decision last December.

We have, moreover, done so in a manner that is fair and evenhanded.

A labor union, like a corporation, may establish only one political committee, so that the limitations the act imposes on contributions may not be avoided.

Similarly, a labor union, like a corporation, must report voter registration and get-out-the-vote expenditures made on behalf of a specific candidate in excess of \$2,000 per election.

And a labor union, like a corporation, may solicit contributions from the non-organized employees of a company only twice a year, and then only by mail.

Mr. Speaker, if the word "fairness" implies a balancing of rights, this bill represents an equitable balance between the rights of corporations and labor unions. It is the product of deliberation, negotiation and compromise.

It is a good bill supported by members of the conference committee of both parties.

It is strongly supported by Common Cause, which has been a vigorous champion of campaign reform.

It will bring to an end the hiatus in Federal matching funds which during the last month has hampered candidates for President in both parties.

I urge all Members to cast their vote in favor of the reasonable provisions embodied in this bill in order that we might send it to the President without further delay.

And I would then urge the President to sign the measure into law. A veto would be most irresponsible on his part. We must have clean elections in this country.

Mr. THOMPSON. Mr. Speaker, will the gentleman yield?

Mr. BRADEMAS. I yield to the gentleman from New Jersey.

(Mr. THOMPSON asked and was given permission to revise and extend his remarks.)

Mr. THOMPSON. Mr. Speaker, I thank the gentleman and I would like to associate myself with the gentleman's remarks. Having been one of those who engaged in a colloquy to establish the rules in 1971, I felt very strongly about the misinterpretations of the Commission in handing down SUNPAC. I must say that the final solution arrived at by the conference, thanks to the chairman, the gentleman from Ohio (Mr. HAYS), the gentleman from California (Mr. WIGGINS), the gentleman in the well and others, it seems to me an eminently fair solution to this difficult problem.

Mr. BRADEMAS. Mr. Speaker, I thank the gentleman from New Jersey.

Mr. WIGGINS. Mr. Speaker, I yield such time as he may consume to the gentleman from South Dakota (Mr. PRESSLER).

(Mr. PRESSLER asked and was given

permission to revise and extend his remarks.)

Mr. PRESSLER. Mr. Speaker, the Federal Election Commission Act amendments conference report has today been voted on by this body. The first time we in the House voted on these amendments, I cast a "no" vote because I was opposed to certain aspects of the bill which I felt harmed our Federal election process rather than made it more accountable. However, I today cast an "aye" vote, because certain changes in the conference committee were made in the bill which made it more acceptable and I feel strongly that we must act on this legislation to insure the orderly continuation of the electoral system presently in force.

These changes included deleting a House provision, which had required the FEC to submit all future advisory opinions to the Congress as regulations for congressional approval as well as any advisory opinions issued after October 15, 1974. In addition, the conference report does provide for more equal solicitation by corporate and union political action committees. Both groups—corporate and labor—must report carefully all expenditures in communicating to their members in regard to helping or defeating candidates.

I am not fully satisfied with this legislation; but it has been changed sufficiently in the House-Senate conference to cause me to vote "aye."

Mr. WIGGINS. Mr. Speaker, I yield 2 minutes to the distinguished minority leader, the gentleman from Arizona (Mr. RHODES).

(Mr. RHODES asked and was given permission to revise and extend his remarks.)

Mr. RHODES. Mr. Speaker, I recently received a statement from the President, as follows: "The President as previously stated favors a simple reconstitution of the Federal Election Commission consistent with the Supreme Court decision. However, the President will carefully review the congressional approach and make a decision consistent with the orderly and responsible conduct of the election process."

I think any fair interpretation of this statement is that the President has not made up his mind whether he would sign this bill or whether he would not.

I would like to state, however, that the reason we are here is that the Supreme Court found that parts of the act of 1974 were unconstitutional; mainly, the part dealing with the way the Federal Election Commission was put together. It seems to me, and I expressed myself in this manner at that time, that it would have been much wiser on the part of the House and of the Senate to reconstitute the Commission as the Supreme Court required and not to go into the nuts and bolts of the election law during an election year. It seems to me there is much to be gained by having some idea just what sort of law we operate under in this election. It seems to me we should not change the rules as we cross the stream. It does not serve any good purpose.

I recognize that this bill has as one of its main thrusts the idea of trying to do away with the SUNPAC decision of the FEC.

I can understand why some of the gentlemen on my right would want to do that, because it does guarantee the right of free speech for a corporation and allows the corporation actually to ask its own employees to contribute funds for political purposes. Personally, I do not see anything bad about free speech. When the first amendment is brought up in other contexts, I think most people, both on my right and on my left, support the application of it liberally so that all people can let other people know how they feel on matters like this.

The SPEAKER pro tempore (Mr. McFALL). The time of the gentleman from Arizona has expired.

Mr. WIGGINS. Mr. Speaker, I yield 1 additional minute to the distinguished minority leader.

Mr. RHODES. I ask the question, why would not the board of directors and management of a corporation be under the same types of rules and have the same privilege of communication as other people?

I congratulate the committee on this—the committee has tried to take away some of the unfair tilt of the 1974 law toward organized labor. Nevertheless the tilt, if this bill becomes law, would still be very strongly pro-union and anti-business, and it will be very strongly pro-Democratic and very strongly pro-incumbent. Therefore, I find myself unable to support this bill.

Again, I congratulate the Members who worked on this. They worked hard, they worked long, and I think they came up with a bill which is much better than the one we started out with, but even so the tilt is still there, the bias is still there, and I cannot support it.

Mr. WIGGINS. Mr. Speaker, I yield 2 minutes to the gentleman from New York (Mr. PEYSER).

(Mr. PEYSER asked and was given permission to revise and extend his remarks.)

Mr. PEYSER. Mr. Speaker, while I support and now will vote for this bill, I must say that I take very strong exception to one section of the bill, and I do not quite understand how it even worked its way into the program at all. This deals with the section on page 18 which says that the Senate committee, the Senate campaign committees will be authorized to give \$17,500 to senatorial candidates in their primary and general elections.

My own experience in this area in dealing with my own party, the Republican National Senate Committee, clearly shows that these committees operate arbitrarily, discriminatorily and, in cases, deceptively. These funds are used strictly to protect incumbents. In reality, they are the antithesis of campaign reform, and I am very surprised the conferees allowed this to become part of the bill. It seems to me that we should be protecting the public against what we know to be the misuse of funds.

Mr. HAYS of Ohio. Mr. Speaker, will the gentleman yield?

Mr. PEYSER. I yield to the gentleman from Ohio.

Mr. HAYS of Ohio. I assume the gentleman is saying all these things, these bad things, about the Republican Senatorial Campaign Committee, and not

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about the Democratic committee. I do not know what they do or how they do it, but the Democratic committee does not operate that way.

Mr. PEYSER. I say to the chairman, I have stated it very plainly about who I am speaking right now. I cannot say what the Democratic committee does, but I was going to ask the chairman a question as to the reason why this section (h) on page 18 ever became part of this act, because I do not think it refers to anything we have discussed in the House.

Mr. HAYS of Ohio. Well, it refers to the fact that we have placed a prohibition of \$5,000 on these committees, and the Senate simply would not buy it. Under the rules of county, in order to get a bill, I had to let them more or less set the limits on their campaign committee, but on the House committees we retained the original \$5,000. I would have been a lot happier if we retained it all up and down the line.

Mr. PEYSER. I thank the gentleman. Mr. WIGGINS. Mr. Speaker, I yield 1 minute to the gentleman from New Jersey (Mrs. FENWICK).

(Mrs. FENWICK asked and was given permission to revise and extend her remarks.)

Mrs. FENWICK. Mr. Speaker, I thank my colleague for yielding to me. I think all of us who care very much about election reform were bitterly disappointed with the House bill when it left the House, particularly as it limited disclosure. I voted against it, but I am now persuaded that this bill, although still imperfect, deserves support.

The gentleman from Indiana, who was in the well earlier, said very clearly that we must have clean elections; and, indeed, we must. We are not going to get them if we continue to clip the wings of the Federal Election Commission, if we continue to restrict its powers. But neither will we help reform without a Commission.

Mr. Speaker, there are several clauses in this bill which has come from the conference with which I do not agree. But I do not think we can stand here, crying for election reform, urging election reform, and voting against every bill that comes down the pike with at least some election reform in it.

This bill at least re-establishes the Commission; it contains some election reform, and I, therefore, intend to reverse my previous vote and support it.

Mr. WIGGINS. Mr. Speaker, I yield 5 minutes to the gentleman from Michigan (Mr. VANDER JAGT).

(Mr. VANDER JAGT asked and was given permission to revise and extend his remarks.)

Mr. VANDER JAGT. Mr. Speaker, if I could have the attention of the distinguished chairman, the gentleman from Ohio (Mr. HAYS), I take this time in order to clarify some of the language in this bill as it relates to contribution limitations.

I believe the language is clear, but because it is a long and complex bill I just want the legislative intent to be crystal clear for any future interpreters.

The present law allows an individual to give all or any part of his annual \$25,-

000 limit to a multicandidate committee. This bill changes this in the following way:

If an individual wishes to contribute to a multicandidate committee, such as a corporate or union political action committee, he may give up to \$5,000 to each such committee. However, his aggregate contribution still may not exceed his \$25,000 annual limit. An individual may use his entire annual limit by contributing to the committees established or maintained by a national political party, but no more than \$20,000 may be given to any one such committee.

Mr. HAYS of Ohio. Mr. Speaker, if the gentleman will yield, that is correct. No more than \$20,000 to any one.

Mr. VANDER JAGT. An individual under both present law and this bill may not contribute more than \$1,000 per candidate per election.

Unlike individuals, qualified multicandidate committees under present law do not have an annual \$25,000 limit. This remains the case in S. 3065. Likewise, such a committee may not contribute more than \$5,000 per election to any one candidate or to committees which operate exclusively on behalf of that candidate.

So there is no change there. S. 3065 does make a substantial change in the amounts which multicandidate committees may transfer to other multicandidate committees. As I read the bill the restrictions would be as follows:

A multicandidate committee may transfer to any other multicandidate committee \$5,000 per year. However, if the recipient of this transfer is a committee established and maintained by a national political party, then the limit would be \$15,000 per year. Any number of these transfers to various party committees may be made by the same multicandidate committee.

Is that correct? Mr. HAYS of Ohio. That is correct. Mr. VANDER JAGT. I thank the gentleman.

Finally, on this section, if all committees which are involved in the transfer are national, State, district, or local committees—including any subordinate committee thereof—of the same political party, then none of the limitations apply.

Mr. HAYS of Ohio. That is correct. Mr. VANDER JAGT. I note with great interest that the conference report states that the term "political committee established and maintained by a national political party" includes the Senate and House campaign committees. Since I am the chairman of the National Republican Congressional Committee, and since the gentleman from Ohio is the chairman of the Democratic National Congressional Committee, I wish the RECORD to clearly indicate that, although our respective committees are categorized as "established and maintained by a national political party" for purposes of sections 320(a)(1)(B) and 320(a)(2)(B), that is not necessarily the fact of the matter, except for the purposes of those two sections and those two sections alone. For all other purposes, our committees are creations of the representatives of the two political parties which have been elected to the House. Speaking for my

committee, I can state unequivocally that the Republican Congressional Committee is not maintained by, nor is it in any way subordinate to the Republican National Committee.

However, it is clearly the conferees' intent that the House and Senate Campaign Committees are each entitled to receive up to \$20,000 from an individual and up to \$15,000 from any multicandidate committees.

Mr. HAYS of Ohio. Mr. Speaker, I will say to the gentleman that I agree with him. No matter how these committees are created, for the purposes of the law they are considered to be created that way and, therefore, they come under broader restrictions than any restrictions they might otherwise come under.

Mr. VANDER JAGT. Mr. Speaker, I thank the gentleman.

For the purposes of section 320(a)(1)(B) and section 320(a)(2)(B) that I cited, our committees are considered to be created in that way but they are not considered to be created in that way under any other sections?

Mr. HAYS of Ohio. The gentleman is correct.

Mr. VANDER JAGT. Mr. Speaker, I thank the gentleman very much.

Mr. HAYS of Ohio. Mr. Speaker, I yield 1 minute to the gentleman from Iowa (Mr. BEDELL).

Mr. BEDELL. Mr. Speaker, as the chairman of the committee knows, I have been working to try to get legislation which would prohibit political candidates from converting political contributions to personal use. Such a provision was contained in the Senate bill, but it was deleted in conference because of objections by the House committee.

I would like to know whether the gentleman generally supports the concept that we should not let political candidates convert political contributions to personal use.

Mr. HAYS of Ohio. Mr. Speaker, if the gentleman will yield, I think that general concept would be supported by the House. There were real problems in working out the details in conference, especially in cases where a Member was retiring and had a fund which he accumulated. The fund may have been accumulated about 2 years ago, and the question was: What do you do with it? It might be thought almost impossible to prorate it back to the individual contributors, especially since some of them have no records as to whether they contributed, for instance, another \$10, and pending further study, we just could not come up with an acceptable provision.

I do not fault the general idea, and I think that some day we will be able to work something out in this area.

Mr. BEDELL. The gentleman believes the idea has merit if we could get a proper provision drafted?

Mr. HAYS of Ohio. That is right.

Mr. BEDELL. Mr. Speaker, I thank the gentleman.

Mr. HAYS of Ohio. Mr. Speaker, I yield 1 minute to the gentleman from Wisconsin (Mr. OBEY).

Mr. OBEY. Mr. Speaker, as some Members know, I have not been especially happy with the section of this bill



provides that records need only be kept as to the identity of contributors in excess of \$50.

The conference substitute combines many of the enforcement provisions contained in both the Senate bill and the House amendment, giving the Federal Election Commission expanded and more varied civil enforcement powers. As these are described in detail in the conference report I will not discuss them at this time. However, I would welcome any questions my colleagues might have with respect to these enforcement provisions.

The conferees agreed to a modification of the advisory opinion procedures of the Commission. An advisory opinion may be requested by any Federal officeholder, any candidate for Federal office, any political committee, or the national committee of any political party, concerning the application of a general rule of law stated in the act, or the application of a general rule of law prescribed by the Commission as a rule or regulation, to a specific factual situation. Section 108(a) of the conference bill prohibits the Commission from proposing general rule of law in any form other than as a rule or regulation pursuant to the congressional review procedures of the act. General rulemaking was never intended to be the function of the advisory opinion process. This section clarifies the intent of the Congress in this respect, and requires the Commission to conform their prior advisory opinions to these provisions within 90 days of enactment.

The conference bill prohibits opinions of an advisory nature other than pursuant to the advisory opinion procedure. The bill also expands those who would be able to rely upon an advisory opinion to include any person involved in any specific transaction or activity which is indistinguishable in all its material aspects from the transaction or activity with respect to which the advisory opinion is issued.

The conference substitute amends the procedure for congressional review of Commission rules and regulations by clarifying that Congress may disapprove any provision or series of interrelated provisions which state a single separable rule of law. The proposal in the Senate bill shortening the review time was deleted by the conferees, thus retaining the 30-legislative-day period of existing law.

With respect to limitations on contributions, the conference substitute is a fair compromise between the Senate bill and the House amendment. A person, as defined in the act, will be subject to the existing limitation of \$1,000 per election per Federal candidate. As under present law, earmarked contributions and contributions made to a candidate's authorized political committees are considered to be contributions to that candidate. A person may also not make contributions to any political committee established and maintained by a national political party which in the aggregate exceed \$20,000 in a calendar year. A person is further prohibited from making contributions to any other political committee which in the aggregate exceed \$5,000 in a calendar year. Indi-

viduals would still be subject to the \$25,000 aggregate limitation on all contributions in a calendar year in existing law.

A multicandidate political committee, as defined in the act, may contribute a total of \$3,000 to a Federal candidate and his authorized political committee in any election campaign. A multicandidate political committee would be limited to an aggregate of \$15,000 in a calendar year which it could give to any political committee of a national political party and to an aggregate of \$5,000 in a calendar year it could give to any other political committee. These latter limitations, however, would not apply to transfers between political committees of the same political party.

~~The provisions permitting the Republican or Democratic Senatorial Campaign Committees and the national committee of a political party to make a contribution of \$20,000 to a candidate of the Senate in a calendar year was amended to reduce this amount to \$17,000.~~

The other provisions of the Senate bill and the House amendment relating to limitations on contributions and certain expenditures were similar and are reflected in the conference substitute.

The conference substitute also contains a fair compromise between the Senate bill and the House amendment pertaining to the solicitation by corporations and labor organizations of voluntary contributions to separate segregated funds. It follows the structure of the Senate bill, permitting corporations to solicit voluntary contributions from stockholders and executive or administrative personnel, and labor organizations to solicit their members. The conference bill would clarify the definition of executive or administrative personnel to include individuals employed by a corporation who are paid on a salary, rather than hourly, basis and who have policymaking, managerial, professional, or supervisory responsibilities. In addition to the above, corporations and labor organizations would be able to solicit all employees and stockholders twice a year in writing by mail to their residences with the proviso that the solicitation be designed so that the party making the solicitation cannot determine who makes a contribution of \$50 or less as a result of such solicitation and who does not make such a contribution.

The conference bill adopted the House provisions giving trade associations rights to solicit stockholders and executive or administrative personnel of member corporations.

The conference report, at page 63, states as follows:

The conference substitute follows the House amendment with regard to the solicitation by a trade association of stockholders and executive or administrative personnel (and their families) of a member corporation of such trade association. The conference substitute contains the provision of the Senate bill permitting a membership organization, cooperative, or corporation without capital stock, or a separate segregated fund established by such organizations, to solicit contributions to such a fund from members of such organization, cooperative, or corporation without capital stock. In light of the fact subsection (b)(4)(D) governs solicitations

by a trade association of the stockholders and executive or administrative personnel of a member organization, then the term "membership organization" in subsection (b)(4)(C) is not intended to include a trade association which is made up of corporations.

A question has come up as to the purpose of the phrase "the term 'membership organization' in subsection (b)(4)(C) is not intended to include a trade association which is made up of corporations."

First of all, this language was included to preclude a trade association, which is also a membership organization, and which desires to solicit the stockholders and employees of a member corporation, from avoiding the limitations of 321(b)(4)(D), which limit such solicitation to stockholders and executive or administrative personnel of the member corporation, and further provides that the member corporation must consent to such solicitation and only give its consent to one trade association in a calendar year.

Second, it applies only to trade associations with corporate members and is intended to regulate the solicitation of the stockholders and executive or administrative personnel of such corporate members. A trade association which is a membership organization may, of course, solicit its other members, such as individuals, partnerships, et cetera under 321(b)(4)(C).

In most other respects the provisions of the Senate bill related to corporate and labor union political action committees were retained, except the definition of stockholder, which was omitted, leaving the interpretation of this term to general corporate law.

The conference bill contains limitations on honorariums, increasing the existing limit per speech from \$1,000 to \$2,000 and the yearly aggregate from \$15,000 to \$25,000. In addition, actual travel and subsistence expenses for the recipient of the honorariums and spouse or aide as well as amounts paid or incurred for any agent's fees or commissions are explicitly excluded from the honorarium limitations.

Finally, the conference bill includes the provisions of both the Senate bill and the House amendment pertaining to the termination of matching funds for inactive Presidential primary campaigns and the return of excess public funds not used to defray qualified campaign expenses.

In conclusion, this legislation corrects many of the defects, inequities, and inconsistencies in the campaign finance laws which the Congress and others have observed since passage of the 1974 amendments. It clearly reflects the original intent of the Congress in 1971 and 1974, and at the same time, restructures the campaign finance laws, both to give the Federal Election Commission more extensive and flexible civil enforcement and regulatory powers, as well as to provide for a more balanced and equitable operation of these laws.

Mr. President, as this legislation has been extensively debated in both Houses of the Congress, it is now of critical importance that the Senate act expedi-

1 Mr. Brademas. Again, I am seeing this for the first time,  
2 but isn't that redundant? But for these subsections these  
3 expenditures would be covered by --

4 Chairman Cannon. We can strike the word "otherwise."

5 Mr. Brademas. That is what I am saying, otherwise it's  
6 redundant.

7 Chairman Cannon. The second paragraph beyond that is new  
8 starting with: "It is the conferees' intent." That was just  
9 to define the intent of the calendar year, this being a short  
10 year.

11 Is there objection to those three explanations? Without  
12 objection on the part of the Senate, they are agreed.

13 Page 49 there has been a substitute proposed.

14 Mr. Wiggins. Is it your understanding that the \$17,500  
15 which can be contributed to Senatorial candidates is that on  
16 a per election basis or per candidate basis in a calendar year?

17 Chairman Cannon. Per calendar year.

18 Mr. Wiggins. All right.

19 Chairman Cannon. Because we arrived at that by taking  
20 the \$5,000 per election to start with.

21 Mr. Wiggins. Howard, Mr. Chairman, those are probably  
22 questions more germane to the Senate, but they ought to be  
23 cleared up. But the right to give \$17,500 is per calendar  
24 year by the Senatorial campaign committee. Does that in any way  
25 limit the right of other national committees to give \$5,000?

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1 Is that a total per year or is it still \$5,000 per  
2 election for the other committee?

3 Chairman Cannon. It does not affect the right of other  
4 committees to be able to give whatever we have provided under  
5 the law.

6 Mr. Wiggins. Per election.

7 Chairman Cannon. Per election. Only applies to the  
8 specified committees under the statute.

9 Mr. Wiggins. If the Senators are clear that there is no  
10 ambiguity then I don't have any problems.

11 Chairman Cannon. We are satisfied.

12 Mr. Wiggins. All right.

13 Senator Scott. You said the \$17,500 is per election  
14 too?

15 Chairman Cannon. No. Per calendar year.

16 Senator Pell. Mr. Chairman, does this mean per election,  
17 or I mean per candidate per year? What if there is a caucus  
18 or primary election?

19 Chairman Cannon. Which one are you talking about?

20 Senator Pell. Expenditure, the \$17,500?

21 Chairman Cannon. No, it says per year, per calendar  
22 year in which the election is held is what it says in the  
23 statute.

24 Senator Pell. If there are two elections it would still  
25 be limited?

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1 Chairman Cannon. Still limited to that figure.

2 Somebody had a proposal here for this rewrite of the  
3 conference report on page 49 and 50 starting at the bottom.  
4 Does everybody have a copy of that looking at it?

5 Mr. Shoener. There are several different ones.

6 Chairman Hays. Will you distribute the documents?

7 Chairman Cannon. The conference substitute that I had  
8 here was one that I understand was worked out by the staff  
9 of the House and the Senate, is that correct? On the  
10 Majority side. The other substitute was worked out by staffs  
11 on the Minority side. Suppose we go through the Majority  
12 staff substitute and take a look at it and then we will proceed  
13 to discuss the Minority.

14 Does everybody have the copy now so they can read it?

15 Mr. Dent. Look at the top of page 3, membership  
16 organizations, it does not include or was intended to include  
17 a trade association. Most trade associations are made up of  
18 corporations. That is what they are doing, is representing  
19 corporations within that particular trade's activities.

20 Chairman Hays. Where is that?

21 Mr. Mathis. I don't think so.

22 Mr. Dent. It's your amendment. If you think it's all  
23 right, it's okay with me.

24 Chairman Hays. It says it isn't intended to include,  
25 which is what he wanted to do, exclude it.

7904052402



BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
National Republican Senatorial )  
Committee )

MJR 820 (78)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, certify that on June 12, 1979, the Commission, meeting in an executive session at which a quorum was present, failed by a vote of 3-2 to pass a motion to amend Recommendation 3 of the General Counsel's June 6, 1979, report in MJR 820 (78) to read as follows:

3. Find reason to believe that the National Republican Senatorial Committee and the Republican National Committee may have violated 2 U.S.C. §441a(h) by making contributions to James Martin of Alabama during calendar year 1978 in excess of the limitations of that provision of the Act.

Commissioners Harris, McGarry, and Tiernan voted affirmatively for the motion. Commissioners Aikens and Friedersdorf dissented. Commissioner Thomson was not present at the time of the vote.

Attest:

6/13/79

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary to the Commission

77710152403



FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO: CHARLES STEELE  
FROM: MARJORIE W. EMMONS *MWE*  
DATE: JUNE 11, 1979  
SUBJECT: AMENDED AGENDA FOR THE EXECUTIVE SESSION  
OF TUESDAY, JUNE 12, 1979.

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After consultation with Chairman Tiernan and Staff Director Potter, it was agreed to add two "objected to" MURS to the agenda for TUESDAY, JUNE 12 in the hope that it might not be necessary to hold an executive session on Wednesday, June 13, 1979. (Of course, that would depend on how many additional items now in circulation were "objected to" by noon on Tuesday. If there were only a few, possibly they could be considered on Thursday.)

The two MURS objected to were:

- 1) MUR 820
- 2) MURS 398-218, 328, 368.

*x 975 by phone*  
We hope you find this agreeable.

CC: Chairman Tiernan  
Staff Director Potter

June 8, 1979

MEMORANDUM TO: Marge Emmons  
FROM: Elissa T. Garr  
SUBJECT: MUR 820

Please have the attached General Counsel's Report on MUR 820 distributed to the Commission on a 48 hour tally basis.

Thank you.

79010152405

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED  
OFFICE OF THE  
SECRETARY

79 JUN 8 11:28

In the Matter of )  
 )  
National Republican )  
Senatorial Committee )

MUR 820 (78)

GENERAL COUNSEL'S REPORT

On December 13, 1978, the Commission found reason to believe that the National Republican Senatorial Committee (NRSC) may have violated 2 U.S.C. § 441a(d) by making expenditures in connection with the Senatorial Campaign of James Martin of Alabama in excess of the § 441a(d) limitations published by the Commission. The Commission's published calculations for party spending limits for Senatorial contests limit the national and state committees of the Republican Party to spending no more than \$62,506.94 each on behalf of a Republican candidate for Senate in the state of Alabama. If the National Republican Senatorial Committee acted as the authorized agent of both the National Republican Committee and the Alabama Republican Party, its total spending limit on behalf of Candidate Martin's Senatorial campaign was \$125,013.88. NRSC reported a total of \$196,355.85 in § 441a(d) expenditures on behalf of the Martin campaign.

In response to questions submitted by the Office of General Counsel, NRSC furnished:

79040152406

1. Letters from the Republican National Committee authorizing NRSC to make § 441a(d) expenditures in connection with the Martin campaign -
  - (A) Letter dated 09/05/78 - \$10,000.
  - (B) Letter undated - \$52,000.
  - (C) Letter undated - \$60,000.
  - (D) Letter undated - \$ 1,000.
  
2. Agreements with the Alabama Republican Executive Committee authorizing NRSC to make § 441a(d) expenditures in connection with the Martin campaign -
  - (A) Agreement dated 08/22/78 - \$60,000.
  - (B) Agreement undated - \$62,000.
  
3. Affidavit of Rodney A. Smith, Treasurer, NRSC, in which Mr. Smith states that he supervised and directed the expenditure of § 441a(d) funds in connection with the Martin campaign as authorized by the Republican National Committee and by the Alabama Republican Executive Committee. Mr. Smith further stated that such expenditures were made "properly and in accordance with Commission Advisory Opinion 1978-19."

As stated, NRSC reports disclose a total of \$196,355.85 in § 441a(d) expenditures in connection with the Martin campaign. The affidavit of Rodney A. Smith and additional enclosed materials allocate \$73,370.55 to the Martin Campaign for the Sparkman Senate Seat (S<sub>1</sub>) and \$122,985.30 to the Martin Campaign for the Allen Senate Seat (S<sub>2</sub>). Mr. Martin was a candidate for the Sparkman Seat until October 2, 1978, when he announced his candidacy for the Allen seat. NRSC purports to apply AO 78-19, the "Fraser AO", in its application of separate § 441a(d) expenditure limits to the two Martin races.

79040152407

Thus, NRSC contends that it could spend a maximum of \$122,000 in connection with S<sub>1</sub>, as authorized by the Republican National Committee and the Alabama Republican Executive Committee, and \$123,000 in connection with S<sub>2</sub>, as authorized.

#### LEGAL ANALYSIS

The Commission's Advisory Opinion 78-19 was in response to a request made by the Fraser Senate Committee concerning the application of FECA to transfers between principal campaign committees for Candidate Fraser in his campaign for two separate Senate races. The Commission noted that

[t]he Act specifically permits, and exempts from contribution limits, the transfer of funds from the principal campaign committee of a candidate seeking one Federal office to the principal campaign committee of the same candidate who seeks another Federal office. 2 U.S.C. § 441a(a)(5)(C).

The Advisory Opinion then concluded that FECA's disclosure threshold and contribution limitations would apply to any contributions transferred by one such principal campaign committee to the other.

Advisory Opinions rendered by the Commission apply a general rule of law to a specific factual situation. 2 U.S.C. § 437f(a). And any advisory opinion rendered by the Commission may be relied upon by

(a) any person involved in the specific transaction or activity with respect to which such advisory opinion is rendered; and (b) any person involved in any specific transaction or activity...

2 U.S.C. § 437f(b)(2). See also 11 C.F.R. § 112.5.

79040152408



Thus, it would appear that the Martin principal campaign committee for S<sub>1</sub> could properly rely on AO 78-19 in its transfer of funds to the Martin principal campaign committee for S<sub>2</sub>, that being "indistinguishable in all its material aspects" from the activity in AO 78-19. However, NRSC's expenditure of § 441a(d) funds in connection with Martin's S<sub>1</sub> and S<sub>2</sub> campaigns would seem to be materially different from transfers between two principal campaign committees.

The question then becomes whether, absent AO 78-19, as precedent, NRSC could successfully interpret the language of the statute, 2 U.S.C. § 441a(d), to impose limitations on party coordinated expenditures in connection with general election campaigns for specific Senate seats rather than in connection with general election campaigns of specific candidates. In other words, could NRSC, consistent with § 441a(d) spend up to \$122,000, as authorized by RNC and AREC, in connection with the Sparkman Senate seat and \$123,000, as authorized, in connection with the Allen Senate seat even though James Martin was the Republican candidate supported by NRSC in both races. Or was NRSC limited by § 441a(d) to spending no more than \$122,000, as authorized, in connection with James Martin's Senatorial campaign whether that be for the Sparkman seat or the Allen seat.

79040152409

The language of the statute is less than clear in this regard. Section 441a(d) imposes limitations on expenditures "in connection with the general election campaign of a candidate for Federal office." 2 U.S.C. § 441a(d). This language is susceptible of interpretation as placing a limit on party coordinated expenditures in connection with Federal races or in connection with Federal candidates. The Commission's regulations do not assist in this matter. 11 C.F.R. § 110.8.

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Therefore, the Office of General Counsel recommends that the Commission take no further action in connection with the National Republican Senatorial Committee's possible violation of 2 U.S.C. § 441a(d) since the statute is not explicit on whether the expenditure limitations apply to Federal candidates or to Federal Senate seats. The Commission will want to consider this matter fully in drafting a new Regulation prior to the 1980 elections. However, the Commission's decision to take no further action in this matter should not be read as an adoption of NRSC's interpretation of the statute.

However, it is clear that coordinated party expenditures under § 441a(d) are limited to expenditures "in connection with the general election." The primary election in Alabama was held on September 5, 1978, with a Runoff on September 26, 1978. The Commission's (E) Index shows NRSC expending \$3,000

in coordinated expenditures on July 19, 1978 and \$25,000 in coordinated expenditures on September 1, 1978. NRSC's own journal entries show the July 19, 1978 amount of \$3,000 charged to the National Party limit and the September 1, 1978 amount of \$25,000 charged to the State Party limit. If these expenditures were in connection with the Alabama primary or runoff election rather than in connection with the general election, they would not be allowable under 2 U.S.C. §441a(d). In addition, since the only dated letters of authorization to NRSC were a letter from the Republican National Committee dated September 5, 1978 and one from the Alabama Republican Executive Committee dated August 22, 1978, the July 19, 1978 expenditure would seem outside the scope of § 441a(d) as NRSC was not the "designated agent" of the RNC at the time of the expenditure.

Therefore, the Office of the General Counsel recommends that the Commission find reason to believe that NRSC may have violated 2 U.S.C. § 434 by reporting expenditures made in connection with the Alabama Senatorial primary, and made prior to the time NRSC was the designated agent of RNC, as coordinated expenditures under 2 U.S.C. § 441a(d), 11 C.F.R. § 110.7(a)(4).

NRSC also reports one coordinated expenditure of \$50,000 made on October 2, 1978, the day that James Martin switched his candidacy from the Sparkman seat to the Allen seat. NRSC's

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journal entries allocate \$28,458.63 of this amount to the Allen Senate seat campaign and the balance to the Sparkman Senate seat campaign. The Office of General Counsel recommends that the Commission seek further details from NRSC concerning this expenditure, e.g., the purpose of the expenditure, the method of determining the allocation of the expenditure to S<sub>1</sub> and S<sub>2</sub>. Therefore, the Office of General Counsel recommends that the Commission approve and send the attached letter and interrogatories.

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Finally, NRSC reports contributions pursuant to 2 U.S.C. § 441a(h) to both the S<sub>1</sub> and S<sub>2</sub> Martin campaigns. NRSC ledger sheets allocate § 441a(h) contributions in the amount of \$16,493.27 to candidate Martin in his race for the Sparkman Senate seat (S<sub>1</sub>) and \$17,300.00 as § 441a(h) contribution to candidate Martin in his race for the Allen Senate seat (S<sub>2</sub>). A question has been raised as to the accuracy of interpreting 2 U.S.C. § 441a(h) to limiting Senatorial Campaign Committee contributions to candidates for specific Senate seats. Does § 441a(h) permit a \$17,500 contribution by NRSC to candidate Martin in his S<sub>1</sub> campaign and another \$17,500 contribution by NRSC to candidate Martin in his S<sub>2</sub> campaign?

The provision reads:

(h) Notwithstanding any other provision of this Act, amounts totaling not more than \$17,500 may be contributed to a candidate for nomination for election, or for election, to the United States Senate during the year in which an election is held in which he is such a candidate, by the

Republican or Democratic Senatorial Campaign Committee, or the national committee of a political party, or any combination of such committees.

2 U.S.C. § 441a(h). The important limiting phrase here is "to a candidate for ... election, to the United States Senate during the year in which an election is held in which he is such a candidate." The limiting phrase in § 441a(d)(3) reads "in connection with the general election campaign of a candidate." Thus, the question becomes whether the language of § 441a(h) or its legislative history can be construed more clearly than that of § 441a(d)(3) to apply either to contributions to individual candidates for the Senate or to contributions to specific senate races. The legislative history is helpful in this regard.

Section 441a(h) began as an amendment offered by Senator Johnston during the senate floor debate of FECA's 1976 amendments. 122 Cong. Rec. S 3,805 (daily ed. March 18, 1976) (Remarks of Senator Johnston). The provision as originally introduced amended what became the \$5,000 contribution limitation of § 441a(2)(A) to add the following:

After "exceed \$5,000." add "except that the Republican or Democratic Senatorial Campaign Committee, the Democratic National Congressional Committee, the National Republican Congressional Committee, or the national committee of a political party may contribute at any time amounts not exceeding \$20,000 to candidates for Congress with respect to any or all of the elections in which such candidates seek office during an election year."

79010152413



Id. (Emphasis added). Senator Johnston explained his amendment:

What it does is simply this: it increases to \$20,000 per year for elections that the committee may give to any candidate. Under the present law the committee, the Senatorial, Democratic or Republican, Committee may give \$5,000 per election, election including the primary, runoff, and general election, or \$15,000 for candidates who have all three elections.

What this amendment does is simply say that that amount is increased to \$20,000 is not made dependent upon whether they are primaries, runoffs, or general elections.

Id. (Emphasis added). After some discussion, Senator Johnston amended his amendment to read:

At the appropriate place in the bill insert the following: "Notwithstanding any other provision of this Act the Republican or Democratic Senatorial Campaign Committee, the Democratic National Congressional Committee, the National Republican Congressional Committee, or the national committee of a political party may contribute at any time amounts not exceeding \$20,000 to candidates for Congress with respect to any or all of the elections in which such candidates seek office during an election year."

Id. at S 3,806 (Emphasis added). The Senate voted 64-20 to accept Senator Johnston's amendment as set out above. Id. at S 3,808.

The Senate next discussed the Johnston amendment on March 24, 1976 in the context of an amendment in the nature of a substitute to S.3065 introduced by Senator Cannon. Senator Cannon made the following statement in connection with the substitute's effect on the Johnston amendment:

79040152414

Second, the amendment to S.3065 proposed by Senator Johnston and previously adopted by the Senate is modified to clarify that contributions by the specified party committees do not aggregate more than \$20,000 in an election year.

122 Cong. Rec. S 4,150 (daily ed. March 24, 1976) (Remarks of Senator Cannon) (Emphasis added). Final action on the amendment in the Senate limited its effect to the Senate, Id. at S 4,158 (Remarks of Mr. Johnston) and decreased the limitation from \$20,000 to \$17,500, Id. at S 6,365. The only discussion by the House is contained at H 3,783 (Remarks of Rep. Peyser). Finally, discussion in the House-Senate Conference on S.3065 also indicates that this provision was intended to limit contributions by Senatorial campaign committees to candidates "per calendar year". House-Senate Conference Report to accompany S.3065, Federal Election Campaign Act Amendments of 1976 at 375-77 (April 7, 1976). Complete copies of the above-referenced legislative history are attached.

Thus, it appears that there is sufficient legislative history to support an interpretation of 2 U.S.C. § 441a(h) which would limit NRSC in its contributions to a candidate to \$17,500 per calendar year regardless of the number of elections in which the candidate ran and regardless of the number of Senate seats for which the individual was a candidate.

Although Congressional debate did not specifically anticipate that one individual would be a candidate in more than one Senate race in one year, it is clear that the limitation was

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meant to apply per year not per election. Thus, the rationale of the Fraser AO which required that contributions transferred from S<sub>1</sub> to S<sub>2</sub> be allocated to the original contributors for contribution limitation purposes would be in opposite here where the limitation applies per year and not per election. AO 1978-19. This analysis is consistent with AO 1978-64 which advised NRSC that the \$17,500 limitation of 2 U.S.C. § 441a(h) "relate to a particular candidate for the Senate rather than a particular Senate seat."

Therefore, the Office of General Counsel recommends that the Commission find reason to believe that the National Republican Senatorial Committee may have violated 2 U.S.C. § 441a(a)(h) by making contributions to James Martin during calendar year 1978 in excess of the limitations of that provision of the Act.

RECOMMENDATIONS

1. Take no further action in connection with the National Republican Senatorial Committee (NRSC)'s possible violation of 2 U.S.C. § 441a(d) in connection with the Senatorial campaign of James Martin of Alabama.

2. Find reason to believe that the National Republican Senatorial Committee may have violated 2 U.S.C. § 434 by reporting expenditures made in connection with the Alabama Senatorial primary, and made prior to the time NRSC was the designated agent of RNC, as coordinated expenditures under 2 U.S.C. § 441a(d), 11 C.F.R. § 110.7(a)(4).


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3. Find reason to believe that the National Republican Senatorial Committee may have violated 2 U.S.C. § 441a(h) by making contributions to James Martin of Alabama during calendar year 1978 in excess of the limitations of that provision of the Act.

4. Approve and send the attached letter and interrogatories.

DATE

6/6/79

  
WILLIAM C. OLDAKER  
GENERAL COUNSEL

Attachments

1. NRSC Response
2. Letter to Respondent and Interrogatories
3. Legislative History

79040152417

100-9  
9061

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JAMES F. SCHOENER  
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OF COUNSEL  
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EDWARD A. RYDER

MICHIGAN OFFICES  
15999 WEST TWELVE MILE ROAD  
SOUTHFIELD, MICHIGAN 48076  
(313) 559-2828

January 10, 1979

Kathleen Imig Perkins, Esq.  
Office of General Counsel  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

800227

Re: M U R 820

Dear Ms. Perkins:

Enclosed you will find the affidavit of Mr. Rodney A. Smith, treasurer of the National Republican Senatorial Committee concerning expenditures and contributions to the two Martin for Senate Committees. As is apparent from the last part of the affidavit, Mr. Martin resigned from his candidacy for the Senate seat of retiring Senator John Sparkman (Class 2, United States Senate) in October 1978, and was thereafter nominated to run for the seat left vacant by the untimely death of Senator James Allen of Alabama (Class 3, United States Senate). A similar situation had previously occurred in Minnesota and Advisory Opinion 1978-19 to Congressman Fraser was studiously followed to give direction for such a change in candidacy.

The affidavit should show our compliance with the requirements of that Advisory Opinion and I attach hereto copies of assignment and allocation agreements of the National and State Party committees authorizing our acting as their agent in each of these campaign committees.

I will be glad to furnish any further information or documentation needed to indicate our compliance in this matter, and ask that before any further action is taken that we be given an opportunity for a conference or answer further questions in writing.

Respectfully,

*James F. Schoener*  
James F. Schoener

JFS:cel

Enclosures

P.S. I also enclose a copy of the review by Stan Huckaby, the C.P.A. who checked the items mentioned in the Rodney Smith affidavit.

79040152418



Republican  
National  
Committee

September 5, 1978

The Honorable Bob Packwood, Chairman  
National Republican Senatorial Committee  
227 Massachusetts Avenue, NE  
Washington, D. C. 20002


Dear Bob:

By this letter the Republican National Committee authorizes the National Republican Senatorial Committee to serve as the agent of the Republican National Committee, for the purpose of making expenditures pursuant to 2 USC S441a (d) (3). Your Committee is authorized to make these expenditures, on behalf of the Republican National Committee, in connection with the general election campaign of James Martin of Alabama.

Under S441a (d) (3) you may spend, on the Republican National Committee's behalf, up to \$10,000 for Mr. Martin.

Best personal regards.

Very truly yours,

  
BILL BROCK

BB/bnp

cc: Bob Moore  
Ben Cotten  
Charlie Black  
Jacquie Nystrom  
Matt Wirgau  
Jay Banning

7904015(2)419

Republican  
National  
Committee

Bill Brock  
Chairman

The Honorable Bob Packwood, Chairman  
National Republican Senatorial Committee  
227 Massachusetts Avenue, NE  
Washington, D. C. 20002

Dear Bob:

By this letter the Republican National Committee authorizes the National Republican Senatorial Committee to serve as the agent of the Republican National Committee, for the purpose of making expenditures pursuant to 2 USC S441a(d)(3). Your Committee is authorized to make these expenditures, on behalf of the Republican National Committee, in connection with the general election campaign of Senate Seat 1, Alabama and is in addition to our letter of Sept. 5, 1978, in the amount of \$10,000.

Under S441a(d)(3) you may spend, on the Republican National Committee's behalf, an additional \$52,000 for Mr. Martin, bringing the cumulative total to \$62,000.

Best personal regards.

Very truly yours,



BILL BROCK

BB/bnp

cc: Bob Moore  
Ben Cotten  
Charlie Black  
Jacquie Nystrom  
Jay Banning

79010152420



Republican  
National  
Committee

Bill Brock  
Chairman

The Honorable Bob Packwood, Chairman  
National Republican Senatorial Committee  
227 Massachusetts Avenue, NE  
Washington, D. C. 20002

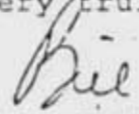
Dear Bob:

By this letter the Republican National Committee authorizes the National Republican Senatorial Committee to serve as the agent of the Republican National Committee, for the purpose of making expenditures pursuant to 2 USC S441a(d)(3). Your Committee is authorized to make these expenditures, on behalf of general election campaign of Senate Seat #2.

Under S441a(d)(3) you may spend, on the Republican National Committee's behalf, up to \$60,000 for Mr. James Martin, of Alabama .

Best personal regards.

Very truly yours,



BILL BROCK

BB/bnp

cc: Bob Moore  
Ben Cotten  
Charlie Black  
Jacquie Nystrom  
Jay Banning  
Kenny Klinge

Republican  
National  
Committee

Bill Brock  
Chairman

The Honorable Bob Packwood, Chairman  
National Republican Senatorial Committee  
227 Massachusetts Avenue, NE  
Washington, D. C. 20002

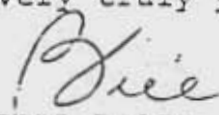
Dear Bob:

By this letter the Republican National Committee authorizes the National Republican Senatorial Committee to serve as the agent of the Republican National Committee, for the purpose of making expenditures pursuant to 2 USC S441a(d)(3). Your Committee is authorized to make these expenditures, on behalf of the Republican National Committee, in connection with the general election campaign of Senate Seat #2. and is in addition to our letter in the amount of \$60,000.

Under S441a(d)(3) you may spend, on the Republican National Committee's behalf, an additional \$1,000 for Mr. Allen, bringing the cumulative total to \$61,000.

Best personal regards.

Very truly yours,

  
BILL BROCK

BB/bnp

cc: Bob Moore  
Ben Cotten  
Charlie Black  
Jacquie Nystrom  
Jay Banning  
Kenny Klinge

79010152422

Republican  
National  
Committee

William D. Harris, State Chairman  
Member for Alabama  
P.O. Box 3315  
Birmingham, Alabama 35205  
(205) 322-5733

AGREEMENT BETWEEN  
THE NATIONAL REPUBLICAN SENATORIAL COMMITTEE  
AND THE ALABAMA REPUBLICAN EXECUTIVE COMMITTEE

The National Republican Senatorial Committee, hereinafter known as "Senatorial", agrees with the Alabama Republican Executive Committee, hereinafter known as "State"; as follows:

1. Under the provision of 441 a(d) (3) of Title 2 of the United States Code, State (and its subordinate committees) may make certain expenditures in connection with the general election campaign of the candidate for the office United States Senator for the State of Alabama.
2. Such amount of allowed expenditures under said provision has been computed tentatively by the Federal Election Commission as the amount of \$62,507.00.
3. That State wishes to designate Senatorial its agent for the purpose of making such expenditures up to the amount of \$60,000.00.
4. State agrees to file an allocation statement concerning the amount not assigned to Senatorial as required by the Federal Election Commission Regulation 110.7(-).
5. State agrees to carry out the provisions of such allocation statement and will promptly advise Senatorial at any time that State and its subordinate committees reach 90% of the amount retained by State and a review of this agreement will occur at such time.
6. Senatorial agrees to make such expenditures in behalf of candidate, or if it is in any manner unable to make such expenditures, to promptly release and cancel said agency and reassign such allocated amount to State.

This agreement signed the date opposite the respective parties' name to be effective when signed by both parties.

Dated May 22, 1978 1978 at  
Washington, D. C.

National Republican Senatorial Committee

By Paul M. Smith

Title Treasurer

Dated 12 August 1978 1978 at  
Birmingham, Alabama.

Alabama Republican Executive Committee

By William D. Harris

Title Chairman

77010132423



  
Republican  
National  
Committee

William D. Harris, State Chairman  
Member for Alabama  
P.O. Box 3315  
Birmingham, Alabama 35205  
(205) 322-5733

AGREEMENT BETWEEN  
THE NATIONAL REPUBLICAN SENATORIAL COMMITTEE  
AND THE ALABAMA REPUBLICAN EXECUTIVE COMMITTEE

The National Republican Senatorial Committee, hereinafter known as "Senatorial", agrees with the Alabama Republican Executive Committee, hereinafter known as "State"; as follows:

1. Under the provision of 441 a(d) (3) of Title 2 of the United States Code, State (and its subordinate committees) may make certain expenditures in connection with the special general election campaign of the candidate for the office United States Senator for the State of Alabama unexpired term Place #2.
2. Such amount of allowed expenditures under said provision has been computed tentatively by the Federal Election Commission as the amount of \$62,507.00.
3. That State wishes to designate Senatorial its agent for the purpose of making such expenditures up to the amount of \$62,000.00
4. State agrees to file an allocation statement concerning the amount not assigned to Senatorial as required by the Federal Election Commission Regulation 110.7(c).
5. State agrees to carry out the provisions of such allocation statement and will promptly advise Senatorial at any time that State and its subordinate committees reach 80% of the amount retained by State and a review of this agreement will occur at such time.
6. Senatorial agrees to make such expenditures in behalf of candidate, or if in any manner unable to make such expenditures, to promptly release and cancel said agency and reassign such allocated amount to State.

This agreement signed the date opposite the respective parties' name to be effective when signed by both parties.

Dated \_\_\_\_\_ 1978 at  
Washington, D. C.

National Republican Senatorial Committee

By *[Signature]*

Title *Treasurer*

Alabama Republican Executive Committee

By *[Signature]*

Title Chairman

Dated \_\_\_\_\_ 1978 at  
Birmingham, Alabama

Political Financial Services

901 L'Enfant Plaza Center, S.W.

Washington, D.C. 20024

(202) 554-2206

Stan Huckaby

Re: (202) 554-4679

Federal Campaign  
Financial Consulting Services

October 17, 1978

Rod Smith  
National Republican Senatorial Committee  
227 Massachusetts Avenue, NE  
Washington, DC 20002

Dear Rod,

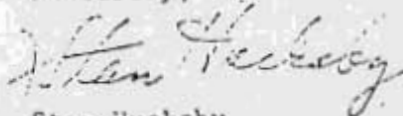
Pursuant to our conversation of last week, I am submitting the following figures to the National Republican Senatorial Committee concerning your limitations on the Jim Martin For Senate Committee.

As you know, Mr. Martin has changed candidacy for election to the United States Senate, and, therefore, under the law, is entering a new election. In accordance with Advisory Opinion 1978-19, we have made an allocation of the "coordinated expenditures" made by the National Republican Senatorial Committee between the first senate race and the second senate race. Of the \$100,000.00 in coordinated expenditures that you have made, \$70,170.55 has been allocated to the first senate campaign, and \$28,458.63 has been allocated to the second campaign. The remaining balance of \$1,370.82 is presently being refunded to you by the vendor. Using A.O. 1978-19, all of your contributions (\$17,500.00 maximum) made to the first senate campaign are non-allocable to the second campaign. Therefore, that limit will begin again. I understand that you have made subsequent contributions to the second senate campaign, and those amounts should be added to the \$28,458.63 in determining the total amount remaining for coordinated expenditures in the second senate campaign. A detailed explanation for this allocation has been telecopied to you by the Jim Martin for Senate Campaign Committee.

All allocations have been made based on the exact amounts of invoices given to us by vendors. Should any of these amounts have a slight variation, we will immediately notify you as to the effects they have on your limitation.

Please feel free to contact me if you have any further questions concerning this matter.

Sincerely,



Stan Huckaby

SH:tmb

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UNITED STATES OF AMERICA  
Before the FEDERAL ELECTION COMMISSION

In the matter of  
NATIONAL REPUBLICAN SENATORIAL COMMITTEE

M.U.R. 820

AFFIDAVIT

City of Washington  
District of Columbia

Rodney A. Smith, being duly sworn deposes and says:

I

That he is the duly appointed treasurer of the National Republican Senatorial Committee of 227 Massachusetts Avenue, N.E., Washington, D.C.

II

That as such treasurer he supervised and directed the making of contributions as allowed by law to Republican candidates for the office of United States Senate in the year 1978.

III

That in such capacity donations of cash (or in-kind) were made to James Martin for Senate (Sparkman seat) from July 11 through August 17th, 1978 in the amount of \$16,493.27 as is shown in our internal records, a copy of which is attached as Exhibit A.

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IV

That in such capacity donations of cash in the amount of \$17,000 were made to James Martin for Senate (Allen seat) on October 6th and an in-kind contribution of use of video equipment of \$300.00 made on/about October 26th as is shown by our internal records, a copy of which is attached as Exhibit B.

V

That he is informed and believes that such cash expenditures are allowed under the provisions of 2 U.S.C. Section 441a(h).

VI

That in such capacity he supervised and directed the expenditure of funds in behalf of James Martin for Senate (Sparkman seat), as authorized by 2 U.S.C. 441a(d) and as assigned to the National Republican Senatorial Committee by Republican National Committee. Said expenditures in behalf of James Martin for Senate (Sparkman seat) are shown in the attached Exhibit C.

VII

That in such capacity he supervised and directed the expenditure of funds in behalf of James Martin for Senate (Allen seat) as authorized by 2 U.S.C. 441a(d) and as assigned to the National Republican Senatorial Committee by the Republican National Committee. Said expenditures in behalf of James Martin for Senate (Allen seat) are shown in the attached Exhibit D. As shown in said Exhibits C and D, a credit for funds or materials transferred from James Martin for Senate (Sparkman seat) to James Martin for Senate (Allen seat) in the amount of \$28,458.63 was made on October 2, 1978.

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VIII

That he is informed and believes that such agency agreements are proper and correct and that the same were in accordance with Commission Regulations # 110.7 and Advisory Opinion 1976-108.

IX

That he supervised and directed the expenditures for James Martin for Senate (Sparkman seat) and James Martin for Senate (Allen seat) as were assigned by allocation agreements from the Alabama (State) Republican Executive Committee, such expenditures being shown on the aforesaid Exhibits C and D.

X

That he is informed and believes that all such transactions were made properly and in accordance with Commission Advisory Opinion 1978-19 "Contributions to Two Campaigns by One Candidate" made in connection with the Fraser for Senate Campaigns, and that the Martin Campaigns are indistinguishable in all material aspects from said Fraser situation.

XI

That in order to make sure that all proper credits were made for cash or credits transferred from the Martin Committee (Sparkman seat) to the Martin Committee (Allen seat), the National Republican Senatorial Committee required a certified public accountant to make

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an on-site review of credits of cash and in-kind contributions transferred from the first committee to the second.

XII

Further deponent saith not.

*Rodney A. Smith*

Rodney A. Smith  
Treasurer, National Republican  
Senatorial Committee

Sworn to and subscribed before me a notary public in and for the District of Columbia this 11 day of January 1979.

*Donald M. Lane*

Notary Public  
My commission expires 3-31-83

79040152429

Candidate: TIM MARTIN

DATE	DESCRIPTION	R.S.C. CK No	RNC-RSC Sect. 401 Expanded	Contribution BALANCE
	LEGAL LIMIT			17,500.
7	11	TRUST ACCOUNT	x \$ 5,000.50 ✓	12,500.
7	25 Holder Kennedy Co * Bell	TRUST ACCOUNT	x \$ 2,500.- ✓	10,000.
6	19 Thomas Tom Sullivan		x \$ 197.- x	9,803.
8	4 Contribution	TRUST ACCOUNT	x \$ 8,000.- ✓	1,803.
8	17 Contribution	TRUST	x \$ 796.27 ✓	1,006.73

EXHIBIT A

79040152430

DATE	DESCRIPTION	RSC CK. No.	PNC-RSC SEC. 441 CONTRIBUTION EXPENDED	BALANCE
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Local Limit 17,500

10 6 Cash Contribution - Trund \$1,700

\$ 500

10 26 Use of Video Eq. used by firm \$ 300

\$ 200

EXHIBIT B

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Candidate: JIM MARTIN

DATE	DESCRIPTION	RSC CK No.	SECTION 441 EXPENDITURES		BALANCE
			NATIONAL Extended	STATE Extended	
1	LEAD LIMIT		62506		62506
2	9 1 Maricopa Assoc Trust Fund			25500	
3	9 14 Daniel & Buros Trust Fund			10000	
4	9 29 Chris Ford Trust				10000
5	10 7 Helene Kanan Trust Bill Smith Trust		25457.63		
6	7 19 John H. Friendly		30000		
7	15 5 Credits for Daniel & Buros		13705.2		38629.45
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EXHIBIT C

DATE	DESCRIPTION	RSC	SECTION 441 EXPENDITURES	
		CK. No.	NATIONAL Expended	STATE Expended
			Balance	Balance
	Least Limit Municipal PNC		62506	62506
10 2	Transfer from Rev. #1		2845863x	
10 6	Holder, Kansas, Transit/line		65000x	
	65,000 Bonded		5000x	2000
10 19	Holder, Kansas, Transit/line		29500	
	Total Bond 29500		27500x	4137
10 26	Eastern Airlines 3871		2667x	
			1470	
				27.00
<p>NOTE: There is an 1/2 cent diff. in C.T.R. on                  Kansas for in quarter bond - 1000 bonds                  (see memo) 3/11 - 1/11/11</p>				

EXHIBIT D

79919132433





FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. James F. Schoener  
Jenkins, Nystrom & Sterlacci, P.C.  
2033 M Street, N.W.  
Washington, D.C. 20036

Re: MUR 820

Dear Mr. Schoener:

The Commission is continuing its investigation in the above-referenced matter. In this regard, the Commission, on \_\_\_\_\_, 1979, found reason to believe that the National Republican Senatorial Committee

1: may violated 2 U.S.C. § 434 by reporting expenditures made in connection with the Alabama Senatorial primary, and one said expenditure made prior to the time NRSC was the designated agent of RNC, as coordinated expenditures under 2 U.S.C. § 441a(d), 11 C.F.R. § 110.7(a)(4);

2: may have violated 2 U.S.C. § 441a(h) by making contributions to James Martin of Alabama during calendar year 1978 in excess of the limitations of that provision of the Act.

Attached is a set of interrogatories, answers to which will assist the Commission in resolving this matter. The interrogatories relate to the fact that NRSC has reported two expenditures, one of \$3,000 on July 19, 1978, and one of \$25,000 on September 1, 1978, as § 441a(d) coordinated expenditures. The Alabama primary was held on September 5, 1978 and the date of the first letter of authorization from the RNC was

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Mr. James F. Schoener  
Page Two

September 5, 1978. In addition, the Commission is seeking further facts relating to the \$50,000 expenditure made on October 2, 1978, part of which was allocated to the Sparkman Senate seat campaign and part to the Allen Senate seat campaign.

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 feel are relevant to the Commission's analysis of these matters. Additionally, please answer the attached Interrogatories and return them to the Commission within ten (10) days of your receipt of this letter. The attorney assigned to this matter is Kathleen Imig Perkins, (202)523-4175. Please contact Ms. Perkins if you have any questions concerning MUR 820.

Sincerely,

William C. Oldaker  
General Counsel

Enclosures

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INTERROGATORIES - SCHOENER - MUR 820

1. State the purpose of NRSC's expenditure of \$3,000 on July 19, 1978, reported as a §441a(d) coordinated expenditure in connection with the Alabama general election campaign of James Martin for U.S. Senate.
2. How was this expenditure related to the general election when the Alabama primary was not held until September 5, 1978 and the runoff was not held until September 26, 1978? Was NRSC the designated agent of RNC (for the purpose of §441a(d) expenditures) as of July 19, 1978?
3. State the purpose of NRSC's expenditure of \$25,000 on September 1, 1978, reported as a §441a(d) coordinated expenditure in connection with the Alabama general election campaign of James Martin for U.S. Senate.
4. Relate this expenditure to the general election.
5. State the purpose of the expenditure made by NRSC on October 2, 1978 in the amount of \$50,000.
6. What method was utilized to allocate part of this expenditure to the Martin S<sub>1</sub> campaign and part to the S<sub>2</sub> campaign.
7. Were any media materials, developed using S<sub>1</sub> NRSC coordinated expenditures, utilized in the S<sub>2</sub> campaign? If so, was an amount allocated to S<sub>2</sub> for purchase of said materials?
8. Please submit any materials or documentation in support of your answers to the above questions.

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Several Senators addressed the Chair. Mr. GRIFFIN. Mr. President, I send an amendment to the desk.

The VICE PRESIDENT. The clerk will report.

The assistant legislative clerk proceeded to read the amendment.

Mr. GRIFFIN. Mr. President, I ask unanimous consent that further reading of the amendment be dispensed with.

The VICE PRESIDENT. Without objection, it is so ordered.

(Pursuant to an order entered later in today's proceedings, Mr. GRIFFIN's second amendment in the nature of a substitute is not printed in the Record.)

Mr. GRIFFIN. I would like to explain this amendment.

Mr. CANNON. Does the Senator have a copy, Mr. President?

Mr. GRIFFIN. We will get some Xeroxed copies made for the chairman and others.

I will tell the Senate this is another substitute, and in this case the Packwood amendment, which is a very meritorious amendment, one of the most important amendments that we have ever adopted around here, but realizing that it is controversial and we lose votes because it is in the substitute, has been eliminated. But the Chiles amendment has been included.

This substitute includes the Chiles amendment, and it also carries the amendment of the Senator from Arizona with regard to honoraria, and we would just like to call the roll again.

Mr. TAFT. Mr. President, will the Senator yield?

Mr. GRIFFIN. I yield.

Mr. TAFT. I wonder if it also contains the amendment of the Senator from Ohio?

Mr. GRIFFIN. I will have to admit it does not at this point. Of course, it is amenable.

Mr. President, I suggest the absence of a quorum.

Mr. CANNON. Mr. President, I would like to see a copy of the amendment.

Mr. GRIFFIN. I suggest the absence of a quorum.

The VICE PRESIDENT. The clerk will call the roll.

The assistant legislative clerk proceeded to call the roll.

Mr. JOHNSTON. Mr. President, I ask unanimous consent that the order for the quorum call be rescinded.

The VICE PRESIDENT. Without objection, it is so ordered.

Mr. JOHNSTON. Mr. President, I have an amendment which I send to the desk.

The VICE PRESIDENT. The clerk will state the amendment.

The assistant legislative clerk proceeded to read the amendment.

Mr. JOHNSTON. Mr. President, I ask unanimous consent that further reading of the amendment be dispensed with.

Mr. CLARK. I object.

The VICE PRESIDENT. Objection is heard. The clerk will read the amendment.

The assistant legislative clerk read as follows:

Amendment to Line 23 of Page 27 of S3065, amending Section 320(a)(2) of the bill, as follows:

After "exceed \$5,000," add "except that the Republican or Democratic Senatorial Campaign Committee, the Democratic National Congressional Committee, the National Republican Congressional Committee, or the national committee of a political party may contribute at any time amounts not exceeding \$20,000 to candidates for Congress with respect to any or all of the elections in which such candidates seek office during an election year."

Mr. JOHNSTON. Mr. President, this amendment is submitted on behalf of myself, Senator BENTSEN, who is a former chairman of our Democratic Senatorial Campaign Committee, as well as Senator STEVENS, the chairman of the Republican Senatorial Campaign Committee.

What it does is simply this: It increases to \$20,000 per year for elections that the committee may give to any candidate. Under the present law the committee, the Senatorial, Democratic or Republican, Committee may give \$5,000 per election, election including the primary, runoff, and general election, or \$15,000 for candidates who have all three elections.

What this amendment does is simply say that that amount is increased to \$20,000 is not made dependent upon whether they are primaries, runoffs, or general elections.

Mr. President, the whole thrust, the whole reason, for this campaign law is to do away, insofar as we can, with what you might call committed money—some call it dirty money, money with strings, money where there is some quid pro quo, express or implied, for the contribution.

So, Mr. President, this amendment increases the amount which you can get from the one source, that is, your Senatorial Campaign Committees or your national committees, for which there is no quid pro quo.

As a matter of fact, I daresay the average Senator in this body does not even know where the contributions come to for the Senatorial Campaign Committees. In the case of the Democratic Committee we do not pass around the list. Some Senators do not even secure contributions, but they all get contributions on a parity basis.

It seems to me, Mr. President, we ought to make it as easy as possible within reason to allow these contributions to be made in reasonable amounts when we know they are not going to be based on any semblance of any promise, expressed or implied.

I hope the manager can go along with this. It has bipartisan support. Frankly, Mr. President, I see no conceivable objection.

I ask for the adoption of this amendment.

Mr. CLARK. Mr. President, when this bill was originally drawn 2 years ago we, of course, had a very extensive debate here about whether or not all committees ought to be limited to \$5,000 or whether we were going to create a special loophole a special situation, a special condition, for our own.

That is really what the issue here is. Are we going to say that labor committees and business committees and so-called good government committees, and all other committees, are limited to \$5,-

000, but when it comes to us that does not apply to the committees that contribute to us and to us only?

In those cases, if we are to adopt this amendment, we would find ourselves giving ourselves \$20,000.

The absolute contribution limitation on the Democratic National Committee, the State committees, county committees, every other committee, is \$5,000. If we adopt this amendment, we are saying that that would apply to all but our own in-house committees.

The great problem with this amendment is that because we wanted to keep the party strong, we have said that an individual may contribute to a party committee, the national committee, or the Democratic or Republican senatorial committees and congressional committees, not just \$5,000, but \$25,000.

I think that is perhaps overly generous, but it is in the bill and in the law. Any individual may contribute to the congressional campaign committees and senatorial campaign committees up to \$25,000. If we are going to allow \$20,000 to go to a candidate, that means we really open up and invite the possibility of earmarking. At least, we make it extremely difficult to enforce the law against earmarking because then we have a way to pass at least \$20,000 out of an individual and into the hands of a House or Senate Member.

Mr. JOHNSTON. Will the Senator yield at that point?

Mr. CLARK. I do yield.

Mr. JOHNSTON. The Senator is aware that there is a specific law which prohibits the earmarking?

Mr. CLARK. Yes.

Mr. JOHNSTON. If someone, expressly or by implication, earmarks, then it is the duty of the committee to so note that earmarking and it is the duty of the candidate to report that as if it were a direct contribution from the original donor and the final donee, the Senator is aware of that?

Mr. CLARK. Yes, that is why I was very careful in saying that it obviously makes it hard to enforce the earmarking law. The earmarking law is the law the Senator just described. Of course, if one can identify someone who said, "We want this \$20,000 to go to that candidate," it is against the law.

But we have to be very concerned in the process of passing this legislation that we do not invite difficulties in the enforcement of this law. I think this would do so.

Mr. JOHNSTON. The Senator is not suggesting that the chairman or the committees of this Congress would be party to circumventing that law, either expressly or impliedly?

Mr. CLARK. No.

Mr. JOHNSTON. The Senator surely is not doing that.

Mr. CLARK. No. But obviously, not every dollar that comes in to the campaign committee goes through the chairman, is seen by him and passed on by him.

Mr. JOHNSTON. Oh, yes, it is. I beg to disagree.

The PRESIDING OFFICER (Mr. GARN). If the Senator will yield, I ad-



wise the Senator from Louisiana that his amendment is not in order. Line 23 has already been deleted from the bill.

Mr. JOHNSTON. Mr. President, I would, therefore, move to amend my amendment by striking the words "after exceed \$5,000 add" and in lieu thereof insert the following "notwithstanding any other provision of this act".

I also want to strike "except that" and put the quotes in front of "the." So, therefore, it would read as follows:

Notwithstanding any other provision of this Act "the Republican or Democratic Senatorial Campaign Committee"

Et cetera.

The PRESIDING OFFICER. The question remains, where does the Senator wish the amendment to come in the bill?

Mr. JOHNSTON. At the appropriate place.

The PRESIDING OFFICER. The amendment is so modified.

The amendment, as modified, is as follows:

At the appropriate place in the bill insert the following: "Notwithstanding any other provision of this Act the Republican or Democratic Senatorial Campaign Committee, the Democratic National Congressional Committee, the National Republican Congressional Committee, or the national committee of a political party may contribute at any time amounts not exceeding \$20,000 to candidates for Congress with respect to any or all of the elections in which such candidates seek office during an election year."

Mr. JOHNSTON. As I was saying to the Senator, if I recall the question, earmarking is totally impossible, and I am sure this applies with equal force to the Republican committee as it does with the Democratic committee.

Not one cent goes out to a political candidate. I know this is true. It was true when Senator BENTSEN was chairman of the committee. It is true when I am chairman of the committee.

Not one cent goes out that is not signed by the chairman, cosigned by the executive council and distributed under a plan generally perfected by the committee.

Mr. CLARK. If I understand the Senator's statement, every cent of money that is taken into the committee is personally received by him, and if there were any conditions assigned to that, he would be aware of it?

Mr. JOHNSTON. No. Every cent that goes out.

Mr. CLARK. That goes out?

Mr. JOHNSTON. That is right.

Mr. CLARK. But not that comes in?

Mr. JOHNSTON. It is illegal to accept under conditions—unless they are earmarked, and that is so stated.

Mr. CLARK. Right.

Mr. JOHNSTON. It does not go out without the chairman actually signing the check.

Mr. CLARK. I understand.

Mr. JOHNSTON. So that it is impossible for a staffer, for example, to receive some money and understand the conditions and send it out of the committee. It comes through as it should, as it must, through the chairman.

Mr. CLARK. Let me try to explain more specifically with regard to this point that I do not think we ought to set up a different standard for the senatorial and congressional campaign committees than we set up for any other committee.

Particularly, I do not think we ought to set up a different level of contribution. There was a good deal of debate here a little while ago on the Chiles amendment about how much faith people have lost in the system, how people believe big money corrupts and that special interests money corrupts.

Now the senatorial and congressional campaign committees can receive money exactly the same way, and from the same kind of sources as any other committee may.

There is no restriction where they can take money.

I would argue that for us then to create a special category—every committee in America can spend so much except one committee, our committee—it is only going to cause greater cynicism, and justifiably so, from the American electorate.

Mr. JOHNSTON. I say to my distinguished friend that precisely the opposite results come from this committee.

Surely the Senator cannot compare a Democratic committee or a Republican committee to a labor committee or a business committee or any special interest.

Mr. CLARK. Why not?

Mr. JOHNSTON. Because we have no public interest, other than the party interest.

Mr. CLARK. The Senator is going to take contributions from labor for the committee, is he not? It is exactly the same dollar—from business as well—whether for Republican or Democrat.

The Senator makes no restriction on where that money comes from.

Mr. JOHNSTON. But it is comingled in a common pot and given out without strings.

That is the key, and that is the reason for this amendment.

If we assume a certain amount of money is essential in a campaign, and I think that is a safe assumption, then if we cannot get it from the committee, we get it directly from the special interest group, and is this not much better than getting it from the special interest?

Mr. CLARK. Is the Senator saying the campaign committees handle money that is somehow purified as compared to the Democratic National Committee or the Republican National Committee or the State committees?

Mr. JOHNSTON. This amendment is applicable to the Republican National Committee and the Democratic National Committee and, yes, that is precisely what I am saying. It is purified because to the extent that there is any express or implied strings on the money, or the appearance of strings on the money, then those strings are cut by going through this committee.

Mr. CLARK. Maybe I misunderstood the Senator's amendment.

Mr. JOHNSTON. Apparently, what?

Mr. CLARK. There are no copies of the amendment available.

Mr. JOHNSTON. I gave the Senator a copy earlier, as a matter of fact.

Mr. CLARK. It says:

Except that the Republican or Democratic Senatorial Campaign Committee, the Democratic National Congressional Committee, the National Republican Congressional Committee, or the national committee of a political party may contribute at any time amounts not exceeding \$20,000 to candidates for Congress with respect to any or all of the elections in which such candidates seek office during an election year."

What is being said is that every committee in America is limited to \$5,000, except the senatorial and congressional campaign committees and the national committees.

Mr. JOHNSTON. That is precisely correct.

Mr. CLARK. Mr. President, I would like to say that what we are doing now is saying to the Democratic National Committee, "You cannot only give \$5,000 under the present law, you can spend 2 cents a voter for every voter in a State, with a minimum of \$20,000, on behalf of a candidate. So you can spend \$5,000 now plus \$20,000 or 2 cents a voter, whichever is more. Now we are going to lift that limit of \$5,000 all the way to \$20,000."

That means the Democratic National Committee and the Republican National Committee can now contribute a minimum of \$40,000 to any candidate in Congress. Apparently, according to the amendment, it could not do that for the President. He would be restricted to \$5,000. But Senators and Congressmen would be allowed \$20,000 in direct cash and a minimum of \$20,000 in expenditures on their behalf. That is now a \$40,000 minimum limitation that can be either given directly or spent on their behalf.

Am I interpreting the amendment correctly?

Mr. JOHNSTON. This amendment simply changes from an aggregate of \$15,000 to an aggregate of \$20,000 that a candidate may get directly from these committees. It does not change in any way what he may get otherwise. Right now, as I understand the law, a candidate may have expenditures made on his behalf by the national committee to the extent of \$20,000 and he may have spent on his behalf by the Congressional Committee \$15,000, assuming he has a primary, a runoff and a general election. All this changes is that \$15,000 provision to a \$20,000 provision, and it takes over the requirement that there are three elections. In other words, they may get \$20,000 even if they only have a general election.

I would suggest to the Senator we are not changing it to allow the \$40,000 but simply changing it from the \$15,000 to the \$20,000. If a candidate were so lucky to get the full \$40,000, and I submit that is going to be very rare indeed, what is wrong with that? Is it not better for him to get that money, which I submit is purified, rather than get it directly from the special interest group, directly from the labor group or directly from the business group?

Mr. CLARK. I must say that I do not



share the Senator's view that somehow the money that goes through the Senatorial Campaign Committee or the Congressional Campaign Committee is as pure as the driven snow, and the money that comes from individuals who participate in labor is tainted or business money is tainted.

Mr. JOHNSTON. It is not that it is tainted. It is that they have a special point of view and they give their money to promote candidates who share that point of view.

Mr. CLARK. I assume if that were the only criterion, the Democratic Committee gives it to candidates that share their view and the Republicans give it to candidates that share their view.

Mr. JOHNSTON. No, that is not so, because any member of the Democratic Caucus, regardless of his view, even if at times it strays from the majority, is entitled to his share of the money.

Mr. CLARK. But it is a Democratic view. They are not giving money to anybody but Democrats or they are not giving money to anybody but Republicans.

Mr. JOHNSTON. That may be so, but that, I submit, is under our system of government which, in effect, has enshrined the two-party system. That is permissible and that is the kind of taint, if the party puts a taint on money, that our system of government envisions and endorses and has run on traditionally. No one out there in America can say because a party gives someone money that there is anything wrong with that. That is traditional American politics.

Mr. CLARK. I think what the amendment does and what it says is quite clear. I would like the Senator from Louisiana to correct me if I am wrong. Every single committee in the United States that falls under this law would have a \$5,000 limitation on the amount that they can contribute, with two exceptions carved out by this amendment: The national committees of the two major parties and the congressional and senatorial committees of the two major parties. In those cases they would be allowed to give \$20,000 in direct cash plus, in accordance with the present law, the national party committees would be allowed to spend a minimum of \$20,000 on their behalf.

That means that we are going to arrive at a conclusion where the two national committees can now spend an aggregate of \$40,000, \$20,000 indirect and \$20,000 direct, \$40,000 minimum. In those States where two cents a voter amounts to more than \$20,000, they would be able to spend in excess of that.

Mr. JOHNSTON. Will the Senator yield for a question?

Mr. CLARK. Yes.

Mr. JOHNSTON. How much can those sources now spend, assuming there is a primary, a runoff, and a general election?

Mr. CLARK. First of all, let us assume that the primary, runoff, and general election do not occur in at least half of the races in America. We have never had a runoff, to my knowledge, in any place in my part of the country. I do not think one can assume that one automatically gets \$5,000 in three elections. I think on the average there will be two elections, and on some occasions three elections.

That is direct money. What the Senator is suggesting is that in those cases where there is a primary and a general election we would be able to double that to \$20,000. I think it only means the introduction of bigger money into politics and greater cynicism about it, particularly when we are doing it for ourselves, particularly when we are doing it to our own committees.

As I say, we debated this at length 2 years ago. Maybe the Senate feels differently about it now, but I feel very strongly that if we were to say that our committees ought to be different, that we ought to be able to give \$20,000 instead of \$5,000, we would come in for a great deal of justifiable criticism.

Mr. JOHNSTON. Mr. President, just one final word. I believe the amendment is well understood. I would like to simply point out that the \$20,000 the National Committee may now spend on behalf of a candidate is not inserted by this amendment. That is not changed by this amendment. All this amendment does is increase basically for the senatorial campaign committees from an aggregate of \$15,000 in case there are the three elections to a total of \$20,000 for however many elections there are.

I submit that when we say we are doing it for ourselves, what we mean is that we are doing it for any candidate for national office, whether he be a congressional candidate or a senatorial candidate. In that sense, this is not a club amendment, if one wants to call it that. It is not for incumbents; it is for any candidate that the committee may give money to.

Mr. ALLEN. Will the Senator yield?

Mr. JOHNSTON. Yes, I will yield.

Mr. ALLEN. This would cover primaries and run-off primaries as well, would it not?

Mr. JOHNSTON. That is correct. Under the present law, the campaign committee can give \$5,000 for the primary, \$5,000 in a run-off, and then another \$5,000 in the general election, which is a total of \$15,000. What this would allow is to give the committee some flexibility. If the Senator's tough race is the general, he could withhold the whole \$20,000 until that time.

Mr. ALLEN. How often do either of the committees contribute to a challenger of an incumbent?

Mr. JOHNSTON. In the case of the Democratic Committee that is not done.

Mr. ALLEN. In other words, this, then, is just for the benefit of incumbents; is that not right?

Mr. JOHNSTON. It would also apply to the challengers, I mean in those cases where an incumbent is beaten and a new incumbent is elected.

Mr. ALLEN. That is right; in other words, in general elections. But through the primaries, first and second, it would be the incumbent who was taken care of. I have no objection to taking care of incumbents, but —

Mr. JOHNSTON. Except in cases where you have no incumbents, as in the case of retirees.

Mr. ALLEN. But where there is an incumbent, there would be no impediment

to any incumbent receiving funds, in the general election or primary, either one.

Mr. JOHNSTON. The Senator is correct in the point he makes, in the sense that that is the standard operating procedure under which we have operated, and I see no movement to change it. But the Senator is correct in the point he makes.

Mr. ALLEN. I just want us to understand what we are voting on. As long as the incumbent is in the picture, he is the one who gets the benefit of the increased amount.

Mr. JOHNSTON. Not just the incumbent.

Mr. ALLEN. I say, as long as the incumbent is in the picture, though, he would be the one to really benefit.

Mr. TAFT. Mr. President, will the Senator yield?

Mr. JOHNSTON. I yield to the Senator from Ohio.

Mr. ALLEN. But is that not true?

Mr. JOHNSTON. Yes; the Senator is correct.

Mr. TAFT. Is it not true that that depends upon what the committee involved desired to do? If the committee involved desired to make other rules, it could make other rules as to the distribution of those donations.

Mr. JOHNSTON. That is correct. There is no rule that specifies how a national committee or a senatorial committee is going to spend its money.

Mr. TAFT. Well, the Senator is not entirely correct. The Republican senatorial committee does have certain rules.

Mr. JOHNSTON. Well, yes.

Mr. CLARK. Mr. President, will the Senator yield?

Mr. JOHNSTON. I yield.

Mr. CLARK. I would like to ask the Senator if his amendment would allow the national committee to give more money to a Presidential campaign. Does it increase the limit that may be given to a Presidential candidate?

Mr. JOHNSTON. I do not believe so. It is not intended to, and I do not believe that the phraseology is subject to that interpretation.

Mr. CLARK. That is the way I would interpret it. Therefore, I wonder if this would not be interpreted, and quite accurately, as an amendment aimed only at helping Senators and Members of Congress. The Senator seeks to permit those national committees to give us more, but not the President more. We are not raising the amount the national committee can give to a President; that remains the same.

Mr. JOHNSTON. That is correct.

Mr. CLARK. So it seems to me all we are doing is saying we want to funnel a lot more money into Senate and congressional campaigns through giving the national committee a separate contribution limitation, and the same with the campaign committees. I do not see how it could be interpreted except that way, as a means of getting more money into our own congressional campaigns.

I think, as the Senator from Alabama has emphasized, it is merely a means of

getting more money into an incumbent's campaign, because this amendment does favor incumbents. For all those reasons, Mr. President, I hope the Senate will not adopt this amendment, because I think if we open up the flood gates and say this committee ought to go from \$5,000 to \$20,000, we will have a very difficult time in saying that State committees, county committees, and other committees ought not to be able to do that. Then we will not have a \$5,000 limitation on committees, but a \$20,000 limitation. After all, how does one justify increasing from \$5,000 to \$20,000 for national committees and not State committees?

Mr. JOHNSTON, Mr. President, will the Senator yield at that point so that I may ask for the yeas and nays?

Mr. CLARK, Yes.

Mr. JOHNSTON, Mr. President, I ask for the yeas and nays.

The ACTING PRESIDENT pro tempore (Mr. HANSEN). Is there a sufficient second? There is a sufficient second.

The yeas and nays were ordered.

Mr. JOHNSTON, I thank the Senator.

Mr. CLARK, Mr. President, I am prepared to yield back the remainder of my time.

Mr. JOHNSTON, I yield back the remainder of my time.

The ACTING PRESIDENT pro tempore. All remaining time having been yielded back, the question is on agreeing to the amendment of the Senator from Louisiana (Mr. JOHNSTON). On this question, the yeas and nays have been ordered, and the clerk will call the roll.

The legislative clerk called the roll.

Mr. ROBERT C. BYRD, I announce that the Senator from Idaho (Mr. CHURCH), the Senator from Indiana (Mr. HARKER), and the Senator from Washington (Mr. JACKSON) are necessarily absent.

I further announce that, if present and voting, the Senator from Washington (Mr. JACKSON) would vote "yea."

Mr. GRIFFIN, I announce that the Senator from North Carolina (Mr. HELMS) and the Senator from North Dakota (Mr. YOUNG) are necessarily absent.

I further announce that the Senator from Vermont (Mr. STAFFORD) is absent due to illness.

I further announce that, if present and voting, the Senator from North Carolina (Mr. HELMS) would vote "yea."

The result was announced—yeas 64, nays 30, as follows:

[Rollcall Vote No. 85 Leg.]

YEAS—64

BAIRD	Griffin	Pastore
BARTLETT	Hansen	Pell
BATH	Haskell	Percy
BELLMON	Hatfield	Proxmire
BENTON	Hawaway	Randolph
BURKLEY	Hruska	Ribicoff
BYRD, Robert C.	Huddleston	Schweiker
CHAMBERLAIN	Humphrey	Scott, Hugh
CHAMBERS	Inoué	Scott
CHRISTENSEN	Johnston	William L.
CLARK	Lasker	Sparkman
COLE	Leahy	Stennis
CONRAD	Long	Stevens
DAWSON	Magnuson	Symington
DELOACH	Mohr	Taft
FRANK	M. Cleland	Tamm
FURBER	McCure	Thomson
GARDNER	McGuire	Tower
GIBBS	Montoya	Tunney
GOLDWATER	Muskie	Wicker
GRASSLEY	Nelson	Williams
GRASSLEY	Parkwood	

NAYS—30

ABRAHAM	Clark	Metcalf
ALLEN	Culver	Mondale
BEALL	Durkin	Morgan
BIDEN	Hart, Gary	Moss
BROOK	Hart, Philip A.	Nunn
BROOKE	Hollings	Pearson
BUMPERS	Javits	Roth
BURDICK	Kennedy	Stevenson
BYRD	Mathias	Stone
CHILES	McGovern	
CHILES, Harry F., Jr.	McIntyre	

NOT VOTING—0

Church	Helms	Stafford
Harker	Jackson	Young

So Mr. JOHNSTON's amendment was agreed to.

Mr. CANNON, The President, I move to reconsider the vote by which the amendment was agreed to.

Mr. TAFT, I move to lay that on the table.

The motion to lay on the table was agreed to.

Mr. TAFT, Mr. President, I send to the desk an amendment to the pending substitute by Mr. GRIFFIN.

The PRESIDING OFFICER. The amendment will be stated.

The second assistant legislative clerk proceeded to read the amendment.

Mr. TAFT, I ask unanimous consent that further reading of the amendment be dispensed with.

The PRESIDING OFFICER. Without objection, it is so ordered.

The amendment is as follows:

On page 1, in subsection (c)(1) after the word "ballot", add the following: "or certifies to the Commission that he will not be an active candidate in the primary".

At the end of subsection (c)(1) add the following new sentence: "The provisions of this section shall apply as of the date of enactment."

Mr. TAFT, This is an amendment that had already passed on the first Griffin substitute and on the bill itself. I am attempting now to put it into the second Griffin substitute. As the Members of the Senate who were here will recall, the amendment relates to a limitation on the payout share to the Presidential candidates. It eliminates candidates who, for two consecutive primaries, have under 10 percent of the vote in those primaries, with the provision that Senator BAYH asked to be included, to the effect that if a candidate wishes to certify that he is not an active candidate, this will not count against him in that primary so far as elimination is concerned. I know of no objection to it. It went through by a voice vote originally.

Mr. CANNON, Mr. President, do I understand correctly that this is the same amendment to decertify Presidential candidates provided that they do not get a certain percent of the votes in the primary, and this is the amendment that was offered before to S. 3065 and also to the previous Griffin substitute?

Mr. TAFT, The Senator is entirely correct.

Mr. CANNON, Mr. President, I am willing to accept the amendment. I think it is a good amendment.

The PRESIDING OFFICER. The question is on agreeing to the amendment.

The amendment was agreed to.

Mr. CRANSTON, Mr. President, I send an amendment to the desk and ask for its immediate consideration.

Mr. MANSFIELD, Mr. President, will the Senator yield?

Mr. CRANSTON, Certainly.

MODIFICATION OF ORDER TO REPORT SENATE RESOLUTION 400

Mr. MANSFIELD, If I may have the attention of the Senate, I ask unanimous consent that the order of the Senate mandating the Senate Rules Committee to report Senate Resolution 400 establishing a Standing Committee on Intelligence Activities on March 20, 1976, be modified as follows:

Senate Resolution 400 be reported forthwith from the Committee on Rules and immediately be referred simultaneously to the Committee on the Judiciary and to the Committee on Rules;

That the Committee on the Judiciary make its recommendations on Senate Resolution 400 not later than the close of business on March 29, 1976 and that the recommendations of the Committee on the Judiciary be referred without further action by the Senate to the Committee on Rules; and

That the Rules Committee report its final recommendations not later than April 5, 1976.

Mr. JAVITS, Mr. President, may I inquire—

Mr. MANSFIELD, This has been cleared.

Mr. JAVITS, Mr. President, I just wanted to know that, because I happen to be the only ranking member of the Committee on Government Operations here.

Mr. MANSFIELD, I looked for the Senator, but he was not available. He was in a hearing.

Mr. JAVITS, I understand.

Mr. MANSFIELD, I cleared it with Senators CANNON, HATFIELD, EASTLAND, TUNNEY, HART, BYRD, HRUSKA, RIBICOFF, and SCOTT.

Mr. JAVITS, Has it been cleared with Mr. Percy, the ranking member?

Mr. MANSFIELD, I shall trust the Senator from New York to get him.

Mr. JAVITS, I shall not object. I just wanted to know that.

Mr. MANSFIELD, I thank the Senator.

FEDERAL ELECTION CAMPAIGN ACT AMENDMENTS OF 1976

The Senate continued with the consideration of the bill (S. 3065) to amend the Federal Election Campaign Act of 1971 to provide for its administration by a Federal Election Commission appointed in accordance with the requirements of the Constitution, and for other purposes.

Mr. CRANSTON, I yield to the Senator from Oklahoma for a unanimous-consent request.

Mr. BARTLETT, I ask unanimous consent that Don Cogman of my staff be accorded privileges of the floor during consideration of this measure.

The PRESIDING OFFICER. Without objection, it is so ordered.

Mr. CRANSTON, I send an amendment to the desk and ask for its consideration.

The PRESIDING OFFICER. The amendment will be stated.



societies devoted to fostering the exploration of space through space science and the development of space technology and space law; and

Whereas the International Astronautical Federation and its affiliated organizations, the International Academy of Astronautics and the International Institute of Space Law, represent the world's leading authorities in astronautics, the space sciences and space law; and

Whereas the International Astronautical Federation will hold its 27th Congress in Anaheim, California, during 1976, the Bicentennial Year of our Nation, in recognition of the vital contributions made by the United States to the scientific, technical and legal wealth of our civilization; and

Whereas the host organizations for this 27th Congress, to be called the "IAF '76" Congress, are the American Institute of Aeronautics and Astronautics, the American Astronautical Society, the Aerospace Medical Association, the New York Cardiological Society and the Rocket Research Institute, Inc.; and

Whereas the "IAF '76" Congress will be attended by hundreds of people who belong to the International Astronautical Federation's affiliated organizations and member societies from many nations; and

Whereas the "IAF '76" Congress will conduct sessions and present papers in all areas of astronautics, and the space sciences, and space law thereby advancing and strengthening international cooperation and understanding in these critical areas of science, technology, and law; and

Whereas the American Revolution Bicentennial Administration recognizes the "IAF '76" Congress as a significant contribution to the Horizon '76 theme of the national Bicentennial commemoration; and

Whereas the International Astronautical Federation, its affiliated organizations, and its member societies represent considerable hope and promise to the world for the continued advancement of man's accomplishments in the fields of astronautics, the space sciences, and space law, such accomplishments having brought a better life to all humanity; and

Whereas the International Astronautical Federation strongly supports man's exploration of space and the proper use of the environment of space in order to help fulfill man's greatest aspirations and meet his vital needs on earth; Now, therefore, be it

Resolved, That the Senate of the United States recognizes the importance of the 27th Congress of the International Astronautical Federation to be held in Anaheim, California, from October 10 through October 16, 1976; commends the International Astronautical Federation and its affiliated organizations for selecting the United States as the location for its 27th Congress in recognition of the Bicentennial of the United States; and commends the host organizations of the United States for sponsoring the Congress.

Sec. 2. The Secretary of the Senate shall transmit a suitably inscribed copy of this resolution to the International Astronautical Federation.

Mr. MOSS. I thank the Senator from Nevada for his kindness.

#### FEDERAL ELECTION CAMPAIGN ACT AMENDMENTS OF 1976

The Senate continued with the consideration of the bill (S. 3065) to amend the Federal Election Campaign Act of 1971 to provide for its administration by a Federal Election Commission appointed in accordance with the requirements of the Constitution, and for other purposes.

Mr. CANNON. Mr. President, what is the pending business?

The ACTING PRESIDENT pro tempore. The pending business is S. 3065.

AMENDMENT NO. 1516

Mr. CANNON. Mr. President, I call up my amendment in the form of a substitute to S. 3065.

The ACTING PRESIDENT pro tempore. The clerk will state the amendment.

The legislative clerk read as follows:

The Senator from Nevada (Mr. CANNON) for himself, Mr. HATFIELD, Mr. MANSFIELD, Mr. HUGH SCOTT, Mr. ROBERT C. BYRD and Mr. GRIFFIN proposes an amendment in the nature of a substitute numbered 1516.

Mr. CANNON. Mr. President, I ask unanimous consent that the reading of the substitute be dispensed with.

The ACTING PRESIDENT pro tempore. Without objection, it is so ordered.

(The amendment is printed in the Record of March 23, 1976, pages S4066 through S4074.)

Mr. CANNON. Mr. President, yesterday afternoon an amendment in the form of a substitute to S. 3065 was introduced by myself, Senator HATFIELD, Senator MANSFIELD, Senator HUGH SCOTT, Senator ROBERT C. BYRD, and Senator GRIFFIN. This substitute represents an attempt by both sides of the aisle to set forth a reasonable compromise proposal which we can discuss and hopefully reach agreement on in the near future.

It is understood that there are a number of amendments to this substitute which will be proposed and considered by the Senate. At this time, however, I would like to set forth the changes and modifications which this substitute amendment would make to S. 3065 as it had been amended on the floor prior to yesterday.

The essential structure, and in many important respects, the substance of S. 3065 remains intact with the following modifications:

First of all, section 102 of S. 3065, creating an eight-member commission—the number of commissioners was expanded from six to eight by Senator MATHIAS's amendment which was approved by the Senate—remains the same, with the deletion of the provision prohibiting outside business activities of commissioners and the deletion of the provision requiring in a majority vote of the commission that no less than two of the five-member majority be affiliated with the same political party.

In the definitional section 102 a provision was added excluding from the definition of expenditure for limitation purposes partisan activity designed to encourage individuals to register to vote, or to vote, conducted by the national committee of a political party, or a subordinate committee thereof, or the State committee of a national party. Such partisan activity would, however, be required to be reported. This addition had been approved by the Senate as an amendment to an earlier substitute but had not been proposed as an amendment to S. 3065. In addition, the substitute would delete a surplus definition of independent expenditure which is not used in the bill or the substitute as a defined term.

Section 104 of S. 3065 contained some

provisions related to reports by political committees and candidates, in particular the reporting requirement for independent expenditures. Here the substitute has included the reporting requirement proposed by Senator PACKWOOD for expenditures made by corporations and labor organizations' communications to their stockholders or members expressly advocating the election or defeat of a clearly identified candidate. This reporting requirement has been expanded to equitably apply to all membership organizations requiring them to report expenditures directly attributable to such communications and for that reason has been transferred to the reporting sections of the act from the section which dealt only with corporations and labor organizations.

I might add here that I understand that there will be an amendment proposed to set forth a reasonable floor on such reports to the Commission to relieve the burden of such reporting on small businesses and membership organizations, as well as to clarify the nature of the expenditures which must be reported. I personally feel such an amendment would be an equitable and clarifying addition to this disclosure provision and intend to give it my strong support.

The portions of S. 3065 which relate to the general enforcement powers of the Commission which have been previously discussed on the floor remain intact. These are sections 106 and 108 of S. 3065 and the only change is a minor one to clarify that where a conciliation agreement, unless violated, constitutes an absolute bar to any further action by the Commission, it is a bar to further action with respect to the violation which is the subject of the agreement.

The substitute amendment deletes all the advisory opinion provisions of S. 3065. The effect of this is to retain existing law in section 437f of title 2, United States Code, exactly as it now is.

The substitute also would delete those provisions in S. 3065 relating to the House of Representatives procedure for considering the Commission's proposed rules and regulations, leaving this as a matter for the House to act upon at a later time.

The substitute does not make any changes in the section of S. 3065 relating to limitations on contributions and expenditures, as amended to date by the Senate, except in the following specific respects. First, a provision is added to provide for an unlimited transfer of funds between and among political committees of the same political party together with a provision to assure that the antiproliferation rule of S. 3065 would not apply to contributions by a political party through a national committee and to contributions by that party through a single State committee in each State. Second, the amendment to S. 3065 proposed by Senator JOHNSON and previously adopted by the Senate is modified to clarify that contributions by the specified party committees do not aggregate more than \$20,000 in an election year.

This substitute also modifies the section of S. 3065 related to the solicitation

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quest is to allow Senators who oppose this amendment to be notified so they can be present: is that correct?

Mr. PACKWOOD. That is correct.

Mr. ALLEN. I have no objection.

The PRESIDING OFFICER. Without objection, it is so ordered.

The Chair in his capacity as the Senator from Wisconsin suggests the absence of a quorum, and the clerk will call the roll.

The second assistant legislative clerk proceeded to call the roll.

Mr. JOHNSTON. Mr. President, I ask unanimous consent that the order for the quorum call be rescinded.

The PRESIDING OFFICER (Mr. NELSON). Without objection, it is so ordered.

Mr. JOHNSTON. Mr. President, I have an amendment which I send to the desk and ask for its immediate consideration.

The PRESIDING OFFICER. The amendment will be stated.

The legislative clerk read as follows:

On page 35, line 18, strike the words "or House of Representatives."

On page 35, beginning with line 21, strike the words "the Democratic National Congressional Committee, the National Republican Congressional Committee."

Mr. JOHNSTON. Mr. President, a few days ago, I offered an amendment on behalf of myself, Senator STEVENS, and Senator BENTSEN, the effect of which would be to increase the amount which senatorial campaign committees and the House campaign committees could give to a candidate from \$5,000 per election to \$20,000 per year. After that amendment had passed—of course, we have intervened with this substitute bill, but, in the meantime, we have heard from our colleagues in the House, who tell us that making this applicable to the House committees would have the untoward and unwanted effect of raising expectations of House Members way beyond reality. They tell us that, whereas they may be able to give \$1,000 or \$2,000 per Member of Congress, with this kind of language, Members of Congress would come in expecting their \$20,000.

I do not know whether we are going to be able to approach anything close to those kinds of numbers on the Senate campaign committees. We shall have to wait to see how our respective fund-raising events come out to determine how successful we are in that respect. But the House people assure us that it is way beyond reality and it would have the very mischievous effect of disappointing many Members of the House. Accordingly, they asked to be deleted from the special treatment which our amendment of last week gave. All this amendment, therefore, does is excise the words "Congress" or "Democratic Congressional Committee" or "Republican Congressional Committee" from the amendment, which, in turn, makes the amendment, the \$20,000 limit, applicable only to the Senate committees and not to the House committees.

Mr. CANNON. Mr. President, that amendment is acceptable to me as the manager of the bill, on the basis that the Senator has stated it. I am willing to accept the amendment.

Mr. JOHNSTON. I thank my colleague. I ask for its consideration, Mr. President.

Mr. PACKWOOD. Mr. President, I have no objection to the amendment.

The PRESIDING OFFICER. The question is on agreeing to the amendment.

The amendment was agreed to.

Mr. CANNON. Mr. President, I suggest the absence of a quorum.

The PRESIDING OFFICER. The clerk will call the roll.

The second assistant legislative clerk proceeded to call the roll.

Mr. CANNON. Mr. President, I ask unanimous consent that the order for the quorum call be rescinded.

The PRESIDING OFFICER. Without objection, it is so ordered.

Mr. CLARK. Mr. President, I send to the desk an unprinted amendment and ask that it be read.

The PRESIDING OFFICER. The clerk will state the amendment.

The legislative clerk read as follows:

On page 25, between lines 4 and 5, insert the following:

PROHIBITION ON CONVERSION OF CONTRIBUTIONS TO PERSONAL USE

SEC. 107A. Section 317 of the Act (2 U.S.C. 432a), as redesignated by section 105, is amended by striking out "or may be used for any other lawful purpose," and inserting in lieu thereof the following: "may be contributed to him to the National committee or State committee of a political party, or returned by him to his contributors on a pro rata basis (as determined by the Commission), or contributed by him to another candidate."

Mr. CLARK. Mr. President, the purpose of this amendment clearly is simply to correct a flaw in the present law, which could, under certain circumstances, result in the conversion of excess campaign funds to personal use. This amendment would simply add a section whereby we would correct that.

I might say this amendment was suggested by Congressman BECKLEY BEBELL. I think it is a good one. We have talked to the manager of the bill and to other parties interested in this bill. What it would do, frankly, is to say that, in addition, if one has campaign contribution money left over, in addition to the two present ways in which that money can be disposed of—namely, to defray office expenses or to contribute to a charity—we are now providing three additional ways that the money can be disposed of without converting to personal use. Those are to contribute it to a State or National party committee, to contribute it to another candidate's committee, or to return it on a pro rata basis to the contributors.

We think this is important because we know historically that money has been converted from political committees to personal use if income tax is paid on it, and we would like to prevent that, and that is the purpose of the amendment, and I urge its adoption.

Mr. PACKWOOD. Mr. President, will the Senator from Iowa yield?

Mr. CLARK. I yield.

Mr. PACKWOOD. Do I understand from the Senator's amendment that at the moment a candidate would be pro-

hibited from giving this surplus to the National committee or a State committee?

Mr. CLARK. It is not clear whether they would be prevented under present law, but we would like to make it very clear, at any rate, that that would be permissible under the law.

Mr. PACKWOOD. Well, in that case, why strike out "for any other lawful purpose"? Why not add the Senator's amendment indicating this is a lawful purpose?

Mr. CLARK. Well, the reason we are striking "for any other lawful purpose" even though that phrase seems to us rather clearly to allow State and National committees to take funds is that we would like to make it possible in addition for them to return the money to their contributors as an alternative way of disposing of the money and to allow them to contribute to another candidate.

In other words, it is not at all clear that those other two methods we are now adding are permissible under the law presently.

Mr. PACKWOOD. I have no objection to the Senator's amendment, but I come back again why not simply leave in "for any other lawful purpose" and put in the Senator's definitions of lawful purpose, what that would include. What are we striking out when we strike out "or for any other lawful purpose"? What can a candidate now do with money that a candidate could not do with that stricken out?

Mr. CLARK. The point is under the present law it seems quite clear that a person can convert campaign funds to personal use if he pays income tax on it lawfully, and that is why we are striking that section and specifying the exact ways in which the money can be converted. In other words, it would leave the bill as it is under present law if we leave this phrase in, that candidates can indeed convert campaign funds for personal use.

Mr. PACKWOOD. What bothers me—and I agree with the Senator that they should not be converted to personal use—is what might be any other lawful purpose we are thinking of that is not conversion to personal use that we are striking out by striking out that phrase?

Mr. CLARK. Well, we are not aware of any other purpose for which campaign funds, in our judgment, ought to be used.

Mr. PACKWOOD. Mr. President, will the Senator withhold his amendment then and let me try to draft an amendment because I agree with the Senator about conversion, but I would like to make sure that we limit it to that purpose.

When we legislate on the floor, things come up that we do not think about, and I would not want us to trap a member, unconsciously trap a member, of the House or of the Senate who is now spending it for a lawful conversion and which that amendment might strike out.

Mr. CLARK. I would be happy to consult with the Senator.

Mr. President, I request that my amendment be withdrawn.



It is therefore grossly misleading to suggest that the inclusion in this bill of provisions clarifying the political activities permitted to corporations and labor unions is an attempt to "change the rules" in midstream.

On the contrary, what the conference committee has done is to restore the rules which governed Federal elections from 1971 until the Commission's Sun Oil decision last December.

We have, moreover, done so in a manner that is fair and evenhanded.

A labor union, like a corporation, may establish only one political committee, so that the limitations the act imposes on contributions may not be avoided.

Similarly, a labor union, like a corporation, must report voter registration and get-out-the-vote expenditures made on behalf of a specific candidate in excess of \$2,000 per election.

And a labor union, like a corporation, may solicit contributions from the non-organized employees of a company only twice a year, and then only by mail.

Mr. Speaker, if the word "fairness" implies a balancing of rights, this bill represents an equitable balance between the rights of corporations and labor unions. It is the product of deliberation, negotiation and compromise.

It is a good bill supported by members of the conference committee of both parties.

It is strongly supported by Common Cause, which has been a vigorous champion of campaign reform.

It will bring to an end the hiatus in Federal matching funds which during the last month has hampered candidates for President in both parties.

I urge all Members to cast their vote in favor of the reasonable provisions embodied in this bill in order that we might send it to the President without further delay.

And I would then urge the President to sign the measure into law. A veto would be most irresponsible on his part. We must have clean elections in this country.

Mr. THOMPSON. Mr. Speaker, will the gentleman yield?

Mr. BRADEMAS. I yield to the gentleman from New Jersey.

(Mr. THOMPSON asked and was given permission to revise and extend his remarks.)

Mr. THOMPSON. Mr. Speaker, I thank the gentleman and I would like to associate myself with the gentleman's remarks. Having been one of those who engaged in a colloquy to establish the rules in 1971, I felt very strongly about the misinterpretations of the Commission in handing down SUNPAC. I must say that the final solution arrived at by the conference, thanks to the chairman, the gentleman from Ohio (Mr. HAYS), the gentleman from California (Mr. WIGGINS), the gentleman in the well and others, it seems to me an eminently fair solution to this difficult problem.

Mr. BRADEMAS. Mr. Speaker, I thank the gentleman from New Jersey.

Mr. WIGGINS. Mr. Speaker, I yield such time as he may consume to the gentleman from South Dakota (Mr. PRESSLER).

(Mr. PRESSLER asked and was given

permission to revise and extend his remarks.)

Mr. PRESSLER. Mr. Speaker, the Federal Election Commission Act amendments conference report has today been voted on by this body. The first time we in the House voted on these amendments, I cast a "no" vote because I was opposed to certain aspects of the bill which I felt harmed our Federal election process rather than made it more accountable. However, I today cast an "aye" vote, because certain changes in the conference committee were made in the bill which made it more acceptable and I feel strongly that we must act on this legislation to insure the orderly continuation of the electoral system presently in force.

These changes included deleting a House provision, which had required the FEC to submit all future advisory opinions to the Congress as regulations for congressional approval as well as any advisory opinions issued after October 15, 1974. In addition, the conference report does provide for more equal solicitation by corporate and union political action committees. Both groups—corporate and labor—must report carefully all expenditures in communicating to their members in regard to helping or defeating candidates.

I am not fully satisfied with this legislation; but it has been changed sufficiently in the House-Senate conference to cause me to vote "aye."

Mr. WIGGINS. Mr. Speaker, I yield 2 minutes to the distinguished minority leader, the gentleman from Arizona (Mr. RHODES).

(Mr. RHODES asked and was given permission to revise and extend his remarks.)

Mr. RHODES. Mr. Speaker, I recently received a statement from the President, as follows: "The President as previously stated favors a simple reconstitution of the Federal Election Commission consistent with the Supreme Court decision. However, the President will carefully review the congressional approach and make a decision consistent with the orderly and responsible conduct of the election process."

I think any fair interpretation of this statement is that the President has not made up his mind whether he would sign this bill or whether he would not.

I would like to state, however, that the reason we are here is that the Supreme Court found that parts of the act of 1974 were unconstitutional; mainly, the part dealing with the way the Federal Election Commission was put together. It seems to me, and I expressed myself in this manner at that time, that it would have been much wiser on the part of the House and of the Senate to reconstitute the Commission as the Supreme Court required and not to go into the nuts and bolts of the election law during an election year. It seems to me there is much to be gained by having some idea just what sort of law we operate under in this election. It seems to me we should not change the rules as we cross the stream. It does not serve any good purpose.

I recognize that this bill has as one of its main thrusts the idea of trying to do away with the SUNPAC decision of the FEC.

I can understand why some of the gentlemen on my right would want to do that, because it does guarantee the right of free speech for a corporation and allows the corporation actually to ask its own employees to contribute funds for political purposes. Personally, I do not see anything bad about free speech. When the first amendment is brought up in other contexts, I think most people, both on my right and on my left, support the application of it liberally so that all people can let other people know how they feel on matters like this.

The SPEAKER pro tempore (Mr. McFALL). The time of the gentleman from Arizona has expired.

Mr. WIGGINS. Mr. Speaker, I yield 1 additional minute to the distinguished minority leader.

Mr. RHODES. I ask the question, why would not the board of directors and management of a corporation be under the same types of rules and have the same privilege of communication as other people?

I congratulate the committee on this—the committee has tried to take away some of the unfair tilt of the 1974 law toward organized labor. Nevertheless the tilt, if this bill becomes law, would still be very strongly pro-union and anti-business, and it will be very strongly pro-Democratic and very strongly pro-incumbent. Therefore, I find myself unable to support this bill.

Again, I congratulate the Members who worked on this. They worked hard, they worked long, and I think they came up with a bill which is much better than the one we started out with, but even so the tilt is still there, the bias is still there, and I cannot support it.

Mr. WIGGINS. Mr. Speaker, I yield 2 minutes to the gentleman from New York (Mr. PEYSER).

(Mr. PEYSER asked and was given permission to revise and extend his remarks.)

Mr. PEYSER. Mr. Speaker, while I support and now will vote for this bill, I must say that I take very strong exception to one section of the bill, and I do not quite understand how it even worked its way into the program at all. This deals with the section on page 18 which says that the Senate committee, the Senate campaign committees will be authorized to give \$17,500 to senatorial candidates in their primary and general elections.

My own experience in this area in dealing with my own party, the Republican National Senate Committee, clearly shows that these committees operate arbitrarily, discriminatorily and, in cases, deceptively. These funds are used strictly to protect incumbents. In reality, they are the antithesis of campaign reform, and I am very surprised the conferees allowed this to become part of the bill. It seems to me that we should be protecting the public against what we know to be the misuse of funds.

Mr. HAYS of Ohio. Mr. Speaker, will the gentleman yield?

Mr. PEYSER. I yield to the gentleman from Ohio.

Mr. HAYS of Ohio. I assume the gentleman is saying all these things, these bad things, about the Republican Senatorial Campaign Committee, and not

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about the Democratic committee. I do not know what they do or how they do it, but the Democratic committee does not operate that way.

Mr. PEYSER. I say to the chairman, I have stated it very plainly about who I am speaking right now. I cannot say what the Democratic committee does, but I was going to ask the chairman a question as to the reason why this section (h) on page 18 ever became part of this act, because I do not think it refers to anything we have discussed in the House.

Mr. HAYS of Ohio. Well, it refers to the fact that we have placed a prohibition of \$5,000 on these committees, and the Senate simply would not buy it. Under the rules of comity, in order to get a bill, I had to let them more or less set the limits on their campaign committee, but on the House committees we retained the original \$5,000. I would have been a lot happier if we retained it all up and down the line.

Mr. PEYSER. I thank the gentleman. Mr. WIGGINS. Mr. Speaker, I yield 1 minute to the gentleman from New Jersey (Mrs. FENWICK).

(Mrs. FENWICK asked and was given permission to revise and extend her remarks.)

Mrs. FENWICK. Mr. Speaker, I thank my colleague for yielding to me. I think all of us who care very much about election reform were bitterly disappointed with the House bill when it left the House, particularly as it limited disclosure. I voted against it, but I am now persuaded that this bill, although still imperfect, deserves support.

The gentleman from Indiana, who was in the well earlier, said very clearly that we must have clean elections; and, indeed, we must. We are not going to get them if we continue to clip the wings of the Federal Election Commission, if we continue to restrict its powers. But neither will we help reform without a Commission.

Mr. Speaker, there are several clauses in this bill which has come from the conference with which I do not agree. But I do not think we can stand here, crying for election reform, urging election reform, and voting against every bill that comes down the pike with at least some election reform in it.

This bill at least re-establishes the Commission; it contains some election reform, and I, therefore, intend to reverse my previous vote and support it.

Mr. WIGGINS. Mr. Speaker, I yield 5 minutes to the gentleman from Michigan (Mr. VANDER JAGT).

(Mr. VANDER JAGT asked and was given permission to revise and extend his remarks.)

Mr. VANDER JAGT. Mr. Speaker, if I could have the attention of the distinguished chairman, the gentleman from Ohio (Mr. HAYS), I take this time in order to clarify some of the language in this bill as it relates to contribution limitations.

I believe the language is clear, but because it is a long and complex bill I just want the legislative intent to be crystal clear for any future interpreters.

The present law allows an individual to give all or any part of his annual \$25,-

000 limit to a multicandidate committee. This bill changes this in the following way:

If an individual wishes to contribute to a multicandidate committee, such as a corporate or union political action committee, he may give up to \$5,000 to each such committee. However, his aggregate contribution still may not exceed his \$25,000 annual limit. An individual may use his entire annual limit by contributing to the committees established or maintained by a national political party, but no more than \$20,000 may be given to any one such committee.

Mr. HAYS of Ohio. Mr. Speaker, if the gentleman will yield, that is correct. No more than \$20,000 to any one.

Mr. VANDER JAGT. An individual under both present law and this bill may not contribute more than \$1,000 per candidate per election.

Unlike individuals, qualified multicandidate committees under present law do not have an annual \$25,000 limit. This remains the case in S. 3065. Likewise, such a committee may not contribute more than \$5,000 per election to any one candidate or to committees which operate exclusively on behalf of that candidate.

So there is no change there.

S. 3065 does make a substantial change in the amounts which multicandidate committees may transfer to other multicandidate committees. As I read the bill the restrictions would be as follows:

A multicandidate committee may transfer to any other multicandidate committee \$5,000 per year. However, if the recipient of this transfer is a committee established and maintained by a national political party, then the limit would be \$15,000 per year. Any number of these transfers to various party committees may be made by the same multicandidate committee.

Is that correct?

Mr. HAYS of Ohio. That is correct.

Mr. VANDER JAGT. I thank the gentleman.

Finally, on this section, if all committees which are involved in the transfer are national, State, district, or local committees—including any subordinate committee thereof—of the same political party, then none of the limitations apply.

Mr. HAYS of Ohio. That is correct.

Mr. VANDER JAGT. I note with great interest that the conference report states that the term "political committee established and maintained by a national political party" includes the Senate and House campaign committees. Since I am the chairman of the National Republican Congressional Committee, and since the gentleman from Ohio is the chairman of the Democratic National Congressional Committee, I wish the Record to clearly indicate that, although our respective committees are categorized as "established and maintained by a national political party" for purposes of sections 320(a)(1)(B) and 320(a)(2)(B), that is not necessarily the fact of the matter, except for the purposes of those two sections and those two sections alone. For all other purposes, our committees are creations of the representatives of the two political parties which have been elected to the House. Speaking for my

committee, I can state unequivocally that the Republican Congressional Committee is not maintained by, nor is it in any way subordinate to the Republican National Committee.

However, it is clearly the conferees' intent that the House and Senate Campaign Committees are each entitled to receive up to \$20,000 from an individual and up to \$15,000 from any multicandidate committees.

Mr. HAYS of Ohio. Mr. Speaker, I will say to the gentleman that I agree with him. No matter how these committees are created, for the purposes of the law they are considered to be created that way and, therefore, they come under broader restrictions than any restrictions they might otherwise come under.

Mr. VANDER JAGT. Mr. Speaker, I thank the gentleman.

For the purposes of section 320(a)(1)(B) and section 320(a)(2)(B) that I cited, our committees are considered to be created in that way but they are not considered to be created in that way under any other sections?

Mr. HAYS of Ohio. The gentleman is correct.

Mr. VANDER JAGT. Mr. Speaker, I thank the gentleman very much.

Mr. HAYS of Ohio. Mr. Speaker, I yield 1 minute to the gentleman from Iowa (Mr. BEDELL).

Mr. BEDELL. Mr. Speaker, as the chairman of the committee knows, I have been working to try to get legislation which would prohibit political candidates from converting political contributions to personal use. Such a provision was contained in the Senate bill, but it was deleted in conference because of objections by the House committee.

I would like to know whether the gentleman generally supports the concept that we should not let political candidates convert political contributions to personal use.

Mr. HAYS of Ohio. Mr. Speaker, if the gentleman will yield, I think that general concept would be supported by the House. There were real problems in working out the details in conference, especially in cases where a Member was retiring and had a fund which he accumulated. The fund may have been accumulated about 2 years ago, and the question was: What do you do with it? It might be thought almost impossible to prorate it back to the individual contributors, especially since some of them have no records as to whether they contributed, for instance, another \$10, and pending further study, we just could not come up with an acceptable provision.

I do not fault the general idea, and I think that some day we will be able to work something out in this area.

Mr. BEDELL. The gentleman believes the idea has merit if we could get a proper provision drafted?

Mr. HAYS of Ohio. That is right.

Mr. BEDELL. Mr. Speaker, I thank the gentleman.

Mr. HAYS of Ohio. Mr. Speaker, I yield 1 minute to the gentleman from Wisconsin (Mr. OBEY).

Mr. OBEY. Mr. Speaker, as some Members know, I have not been especially happy with the section of this bill

provides that records need only be kept as to the identity of contributors in excess of \$50.

The conference substitute combines many of the enforcement provisions contained in both the Senate bill and the House amendment, giving the Federal Election Commission expanded and more varied civil enforcement powers. As these are described in detail in the conference report I will not discuss them at this time. However, I would welcome any questions my colleagues might have with respect to these enforcement provisions.

The conferees agreed to a modification of the advisory opinion procedures of the Commission. An advisory opinion may be requested by any Federal officeholder, any candidate for Federal office, any political committee, or the national committee of any political party, concerning the application of a general rule of law stated in the act, or the application of a general rule of law prescribed by the Commission as a rule or regulation, to a specific factual situation. Section 108(a) of the conference bill prohibits the Commission from proposing general rule of law in any form other than as a rule or regulation pursuant to the congressional review procedures of the act. General rulemaking was never intended to be the function of the advisory opinion process. This section clarifies the intent of the Congress in this respect, and requires the Commission to conform their prior advisory opinions to these provisions within 90 days of enactment.

The conference bill prohibits opinions of an advisory nature other than pursuant to the advisory opinion procedure. The bill also expands those who would be able to rely upon an advisory opinion to include any person involved in any specific transaction or activity which is indistinguishable in all its material aspects from the transaction or activity with respect to which the advisory opinion is issued.

The conference substitute amends the procedure for congressional review of Commission rules and regulations by clarifying that Congress may disapprove any provision or series of interrelated provisions which state a single separable rule of law. The proposal in the Senate bill shortening the review time was deleted by the conferees, thus retaining the 30-legislative-day period of existing law.

With respect to limitations on contributions, the conference substitute is a fair compromise between the Senate bill and the House amendment. A person, as defined in the act, will be subject to the existing limitation of \$1,000 per election per Federal candidate. As under present law, earmarked contributions and contributions made to a candidate's authorized political committees are considered to be contributions to that candidate. A person may also not make contributions to any political committee established and maintained by a national political party which in the aggregate exceed \$20,000 in a calendar year. A person is further prohibited from making contributions to any other political committee which in the aggregate exceed \$5,000 in a calendar year. Indi-

viduals would still be subject to the \$25,000 aggregate limitation on all contributions in a calendar year in existing law.

A multicandidate political committee, as defined in the act, may contribute a total of \$5,000 to a Federal candidate and his authorized political committee in any election campaign. A multicandidate political committee would be limited to an aggregate of \$15,000 in a calendar year which it could give to any political committee of a national political party and to an aggregate of \$5,000 in a calendar year it could give to any other political committee. These latter limitations, however, would not apply to transfers between political committees of the same political party.

The provisions permitting the Republican or Democratic Senatorial Campaign Committees and the national committee of a political party to make a contribution of \$20,000 to a candidate to the Senate in a calendar year was amended to reduce this amount to \$17,000.

The other provisions of the Senate bill and the House amendment relating to limitations on contributions and certain expenditures were similar and are reflected in the conference substitute.

The conference substitute also contains a fair compromise between the Senate bill and the House amendment pertaining to the solicitation by corporations and labor organizations of voluntary contributions to separate segregated funds. It follows the structure of the Senate bill, permitting corporations to solicit voluntary contributions from stockholders and executive or administrative personnel, and labor organizations to solicit their members. The conference bill would clarify the definition of executive or administrative personnel to include individuals employed by a corporation who are paid on a salary, rather than hourly, basis and who have policymaking, managerial, professional, or supervisory responsibilities. In addition to the above, corporations and labor organizations would be able to solicit all employees and stockholders twice a year in writing by mail to their residences with the proviso that the solicitation be designed so that the party making the solicitation cannot determine who makes a contribution of \$50 or less as a result of such solicitation and who does not make such a contribution.

The conference bill adopted the House provisions giving trade associations rights to solicit stockholders and executive or administrative personnel of member corporations.

The conference report, at page 63, states as follows:

The conference substitute follows the House amendment with regard to the solicitation by a trade association of stockholders and executive or administrative personnel (and their families) of a member corporation of such trade association. The conference substitute contains the provision of the Senate bill permitting a membership organization, cooperative, or corporation without capital stock, or a separate segregated fund established by such organizations, to solicit contributions to such a fund from members of such organization, cooperative, or corporation without capital stock. In light of the fact subsection (b)(4)(D) governs solicitations

by a trade association of the stockholders and executive or administrative personnel of a member organization, then the term "membership organization" in subsection (b)(4)(C) is not intended to include a trade association which is made up of corporations.

A question has come up as to the purpose of the phrase "the term 'membership organization' in subsection (b)(4)(C) is not intended to include a trade association which is made up of corporations."

First of all, this language was included to preclude a trade association, which is also a membership organization, and which desires to solicit the stockholders and employees of a member corporation, from avoiding the limitations of 321(b)(4)(D), which limit such solicitation to stockholders and executive or administrative personnel of the member corporation, and further provides that the member corporation must consent to such solicitation and only give its consent to one trade association in a calendar year.

Second, it applies only to trade associations with corporate members and is intended to regulate the solicitation of the stockholders and executive or administrative personnel of such corporate members. A trade association which is a membership organization may, of course, solicit its other members, such as individuals, partnerships, et cetera under 321(b)(4)(C).

In most other respects the provisions of the Senate bill related to corporate and labor union political action committees were retained, except the definition of stockholder, which was omitted, leaving the interpretation of this term to general corporate law.

The conference bill contains limitations on honorariums, increasing the existing limit per speech from \$1,000 to \$2,000 and the yearly aggregate from \$15,000 to \$25,000. In addition, actual travel and subsistence expenses for the recipient of the honorariums and spouse or aide as well as amounts paid or incurred for any agent's fees or commissions are explicitly excluded from the honorarium limitations.

Finally, the conference bill includes the provisions of both the Senate bill and the House amendment pertaining to the termination of matching funds for inactive Presidential primary campaigns and the return of excess public funds not used to defray qualified campaign expenses.

In conclusion, this legislation corrects many of the defects, inequities, and inconsistencies in the campaign finance laws which the Congress and others have observed since passage of the 1974 amendments. It clearly reflects the original intent of the Congress in 1971 and 1974, and at the same time, restructures the campaign finance laws, both to give the Federal Election Commission more extensive and flexible civil enforcement and regulatory powers, as well as to provide for a more balanced and equitable operation of these laws.

Mr. President, as this legislation has been extensively debated in both Houses of the Congress, it is now of critical importance that the Senate act expedi-



1 Mr. Brademas. Again, I am seeing this for the first time,  
2 but isn't that redundant? But for these subsections these  
3 expenditures would be covered by --

4 Chairman Cannon. We can strike the word "otherwise."

5 Mr. Brademas. That is what I am saying, otherwise it's  
6 redundant.

7 Chairman Cannon. The second paragraph beyond that is now  
8 starting with: "It is the conferees' intent." That was just  
9 to define the intent of the calendar year, this being a short  
10 year.

11 Is there objection to those three explanations? Without  
12 objection on the part of the Senate, they are agreed.

13 Page 49 there has been a substitute proposed.

14 Mr. Wiggins. Is it your understanding that the \$17,500  
15 which can be contributed to Senatorial candidates is that on  
16 a per election basis or per candidate basis in a calendar year?

17 Chairman Cannon. Per calendar year.

18 Mr. Wiggins. All right.

19 Chairman Cannon. Because we arrived at that by taking  
20 the \$5,000 per election to start with.

21 Mr. Wiggins. Howard, Mr. Chairman, those are probably  
22 questions more germane to the Senate, but they ought to be  
23 cleared up. But the right to give \$17,500 is per calendar  
24 year by the Senatorial campaign committee. Does that in any way  
25 limit the right of other national committees to give \$5,000?

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1 Is that a total per year or is it still \$5,000 per  
2 election for the other committee?

3 Chairman Cannon. It does not affect the right of other  
4 committees to be able to give whatever we have provided under  
5 the law.

6 Mr. Wiggins. Per election.

7 Chairman Cannon. Per election. Only applies to the  
8 specified committees under the statute.

9 Mr. Wiggins. If the Senators are clear that there is no  
10 ambiguity then I don't have any problems.

11 Chairman Cannon. We are satisfied.

12 Mr. Wiggins. All right.

13 Senator Scott. You said the \$17,500 is per election  
14 too?

15 Chairman Cannon. No. Per calendar year.

16 Senator Pell. Mr. Chairman, does this mean per election,  
17 or I mean per candidate per year? What if there is a caucus  
18 or primary election?

19 Chairman Cannon. Which one are you talking about?

20 Senator Pell. Expenditure, the \$17,500?

21 Chairman Cannon. No, it says per year, per calendar  
22 year in which the election is held is what it says in the  
23 statute.

24 Senator Pell. If there are two elections it would still  
25 be limited?

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1 Chairman Cannon. Still limited to that figure.

2 Somebody had a proposal here for this rewrite of the  
3 conference report on page 49 and 50 starting at the bottom.  
4 Does everybody have a copy of that looking at it?

5 Mr. Shoener. There are several different ones.

6 Chairman Hays. Will you distribute the documents?

7 Chairman Cannon. The conference substitute that I had  
8 here was one that I understand was worked out by the staff  
9 of the House and the Senate, is that correct? On the  
10 Majority side. The other substitute was worked out by staffs  
11 on the Minority side. Suppose we go through the Majority  
12 staff substitute and take a look at it and then we will proceed  
13 to discuss the Minority.

14 Does everybody have the copy now so they can read it?

15 Mr. Dent. Look at the top of page 3, membership  
16 organizations, it does not include or was intended to include  
17 a trade association. Most trade associations are made up of  
18 corporations. That is what they are doing, is representing  
19 corporations within that particular trade's activities.

20 Chairman Hays. Where is that?

21 Mr. Mathis. I don't think so.

22 Mr. Dent. It's your amendment. If you think it's all  
23 right, it's okay with me.

24 Chairman Hays. It says it isn't intended to include,  
25 which is what he wanted to do, exclude it.

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FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO: CHARLES STEELE  
FROM: MARJORIE W. EMMONS *MWE*  
DATE: APRIL 19, 1979  
SUBJECT: OBJECTION - MUR 820 - General Counsel'  
Report dated 4-16-79; Received in  
OCS 4-17-79, 2:42

The above-named document was circulated on a  
48 hour vote basis at 4:30, April 17, 1979.

Commissioner Friedersdorf submitted an objection  
at 9:23, April 19, 1979, thereby placing MUR 820 on  
the Executive Session Agenda for Wednesday, April 25,  
1979.

*W/Friedersdorf*

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April 17, 1979

MEMORANDUM TO: Marge Emmons  
FROM: Elissa T. Garr  
SUBJECT: MUR 820

Please have the attached General Counsel's Report on MUR 820 distributed to the Commission on a 48 hour tally basis.

Thank you.

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
National Republican ) MUR 820 (78)  
 )  
Senatorial Committee )

GENERAL COUNSEL'S REPORT

In the Commission's first consideration of this matter, it found reason to believe that the National Republican Senatorial Committee (NRSC) may have violated 2 U.S.C. §441a(d) by making expenditures in connection with the Senatorial Campaign of James Martin of Alabama in excess of the §441a(d) limitations published by the Commission. The Commission's published calculations for party spending limits for Senatorial contests limit the national and state committees of the Republican Party to spending no more than \$62,506.94 each on behalf of a Republican candidate for Senate in the state of Alabama. If the National Republican Senatorial Committee acted as the authorized agent of both the National Republican Committee and the Alabama Republican Party, its total spending limit on behalf of Candidate Martin's Senatorial campaign was \$125,013.88. NRSC reported a total of \$196,355.85 in §441a(d) expenditures on behalf of the Martin campaign.

In response to questions submitted by the Office of General Counsel, NRSC furnished:

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- 1) Letters from the Republican National Committee authorizing NRSC to make §441a(d) expenditures in connection with the Martin campaign -
    - (A) Letter dated 9/5/78 - \$10,000.
    - (B) Letter undated - \$52,000.
    - (C) Letter undated - \$60,000.
    - (D) Letter undated - \$ 1,000.
  
  - 2) Agreements with the Alabama Republican Executive Committee authorizing NRSC to make §441a(d) expenditures in connection with the Martin campaign -
    - (A) Agreement dated 8/22/78 - \$60,000.
    - (B) Agreement undated - \$62,000.
  
  - 3) Affidavit of Rodney A. Smith, Treasurer, NRSC, in which Mr. Smith states that he supervised and directed the expenditure of §441a(d) funds in connection with the Martin campaign as authorized by the Republican National Committee and by the Alabama Republican Executive Committee. Mr. Smith further stated that such expenditures were made "properly and in accordance with Commission Advisory Opinion 1978-19."

As stated, NRSC reports disclose a total of \$196,355.85 in §441a(d) expenditures in connection with the Martin campaign. The affidavit of Rodney A. Smith and additional enclosed materials allocate \$73,370.55 to the Martin Campaign for the Sparkman Senate Seat (S<sub>1</sub>) and \$122,985.30 to the Martin Campaign for the Allen Senate Seat (S<sub>2</sub>). Mr. Martin was a candidate for the Sparkman Seat until October 2, 1978, when he announced his candidacy for the Allen seat. NRSC purports to apply AO 78-19, the "Fraser AO", in its application of separate §441a(d) expenditure limits to the two Martin races. Thus, NRSC contends that it could spend a maximum of \$122,000 in connection with S<sub>1</sub>, as authorized by the Republican National

Committee and the Alabama Republican Executive Committee, and \$123,000 in connection with S<sub>2</sub>, as authorized.

LEGAL ANALYSIS

The Commission's Advisory Opinion 78-19 was in response to a request made by the Fraser Senate Committee concerning the application of FECA to transfers between principal campaign committees for Candidate Fraser in his campaign for two separate Senate races. The Commission noted that

[t]he Act specifically permits, and exempts from contribution limits, the transfer of funds from the principal campaign committee of a candidate seeking one Federal office to the principal campaign committee of the same candidate who seeks another Federal office. 2 U.S.C. §441a(a)(5)(C).

The Advisory Opinion then concluded that FECA's disclosure threshold and contribution limitations would apply to any contributions transferred by one such principal campaign committee to the other.

Advisory Opinions rendered by the Commission apply a general rule of law to a specific factual situation. 2 U.S.C. §437f(a). And any advisory opinion rendered by the Commission may be relied upon by

(a) any person involved in the specific transaction or activity with respect to which such advisory opinion is rendered; and (b) any person involved in any specific transaction or activity which is indistinguishable in all its material aspects from the transaction or activity...

2 U.S.C. §437f(b)(2). See also 11 C.F.R. §112.5.

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Thus, it would appear that the Martin principal campaign committee for S<sub>1</sub> could properly rely on AO 78-19 in its transfer of funds to the Martin principal campaign committee for S<sub>2</sub>, that being "indistinguishable in all its material aspects" from the activity in AO 78-19. However, NRSC's expenditure of § 441a(d) funds in connection with Martin's S<sub>1</sub> and S<sub>2</sub> campaigns would seem to be materially different from transfers between two principal campaign committees.

The question then becomes whether, absent AO 78-19, as precedent, NRSC could successfully interpret the language of the statute, 2 U.S.C. § 441a(d), to impose limitations on party coordinated expenditures in connection with general election campaigns for specific Senate seats rather than in connection with general election campaigns of specific candidates. In other words, could NRSC, consistent with § 441a(d) spend up to \$122,000, as authorized by RNC and AREC, in connection with the Sparkman Senate seat and \$123,000, as authorized, in connection with the Allen Senate seat even though James Martin was the Republican candidate supported by NRSC in both races. Or was NRSC limited by § 441a(d) to spending no more than \$122,000, as authorized, in connection with James Martin's Senatorial campaign whether that be for the Sparkman seat or the Allen seat.

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The language of the statute is less than clear in this regard. Section 441a(d) imposes limitations on expenditures "in connection with the general election campaign of a candidate for Federal office." 2 U.S.C. §441a(d). This language is susceptible of interpretation as placing a limit on party coordinated expenditures in connection with Federal races or in connection with Federal candidates. The Commission's regulations do not assist in this matter. 11 C.F.R §110.8.

Therefore, the Office of General Counsel recommends that the Commission take no further action in connection with the National Republican Senatorial Committee's possible violation of 2 U.S.C. §441a(d) since the statute is not explicit on whether the expenditure limitations apply to Federal candidates or to Federal Senate seats. The Commission will want to consider this matter fully in drafting a new Regulation prior to the 1980 elections. However, the Commission's decision to take no further action in this matter should not be read as an adoption of NRSC's interpretation of the statute.

However, it is clear that coordinated party expenditures under §441a(d) are limited to expenditures "in connection with the general election." The primary election in Alabama was held on September 5, 1978, with a Runoff on September 26, 1978.

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The Commission's (E) Index shows NRSC expending \$3,000 in coordinated expenditures on July 19, 1978 and \$25,000 in coordinated expenditures on September 1, 1978. NRSC's own journal entries show the 7/19/78 amount of \$3,000 charged to the National Party limit and the 9/1/78 amount of \$25,000 charged to the State Party limit. If these expenditures were in connection with the Alabama primary or runoff election rather than in connection with the general election, they would not be allowable under 2 U.S.C. § 441a(d). In addition, since the only dated letters of authorization to NRSC were a letter from the Republican National Committee dated September 5, 1978 and one from the Alabama Republican Executive Committee dated August 22, 1978, the 7/19/78 expenditure would seem outside the scope of § 441a(d) as NRSC was not the "designated agent" of the RNC at the time of the expenditure.

Therefore, the Office of General Counsel recommends that the Commission find reason to believe that NRSC may have violated 2 U.S.C. § 434 by reporting expenditures made in connection with the Alabama Senatorial primary, and made prior to the time NRSC was the designated agent of RNC, as coordinated expenditures under 2 U.S.C. § 441a(d), 11 C.F.R. § 110.7(a)(4).

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Finally, NRSC reports one coordinated expenditure of \$50,000 made on October 2, 1978, the day that James Martin switched his candidacy from the Sparkman seat to the Allen seat. NRSC's journal entries allocate \$28,458.63 of this amount to the Allen Senate seat campaign and the balance to the Sparkman Senate seat campaign. The Office of General Counsel recommends that the Commission seek further details from NRSC concerning this expenditure, e.g., the purpose of the expenditure, the method of determining the allocation of the expenditure to S<sub>1</sub> and S<sub>2</sub>. Therefore, the Office of General Counsel recommends that the Commission approve and send the attached letter and interrogatories.

RECOMMENDATIONS

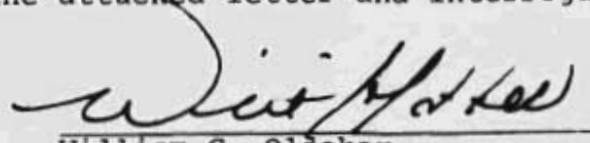
1. Take no further action in connection with the National Republican Senatorial Committee (NRSC)'s possible violation of 2 U.S.C. § 441a(d) in connection with the Senatorial campaign of James Martin of Alabama.

2. Find reason to believe that the National Republican Senatorial Committee may have violated 2 U.S.C. § 434 by reporting expenditures made in connection with the Alabama Senatorial primary, and made prior to the time NRSC was the designated agent of RNC, as coordinated expenditures under 2 U.S.C. § 441a(d), 11 C.F.R. § 110.7(a)(4).

79040152457

3. Approve and send the attached letter and interrogatories.

4/16/79  
Date

  
William C. Oldaker  
General Counsel

Attachments

1. NRSC Response
2. Letter to Respondent and Interrogatories

79040152458

901

LAW OFFICES

JENKINS, NYSTROM & STERLACCI, P.C.

MERLE R. JENKINS  
DENNIS H. NYSTROM  
MICHAEL A. STERLACCI  
CARL F. SCHIER  
JOSEPH E. JANNETTA  
JAMES F. SCHOENER  
STEPHEN J. HITCHCOCK  
CHRIS M. PARFITT  
GARY J. NYSTROM  
RONALD A. DENEWETH  
TIMOTHY J. MULLINS

2033 M STREET, N.W.  
WASHINGTON, D. C. 20036

(202) 293-2505

OF COUNSEL  
JOHN B. CONLAN  
EDWARD A. RYDER

MICHIGAN OFFICE  
15999 WEST TWELVE MILE ROAD  
SOUTHFIELD, MICHIGAN 48076  
(313) 559-2028

January 10, 1979

Kathleen Imig Perkins, Esq.  
Office of General Counsel  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

300307

Re: M U R 820

Dear Ms. Perkins:

Enclosed you will find the affidavit of Mr. Rodney A. Smith, treasurer of the National Republican Senatorial Committee concerning expenditures and contributions to the two Martin for Senate Committees. As is apparent from the last part of the affidavit, Mr. Martin resigned from his candidacy for the Senate seat of retiring Senator John Sparkman (Class 2, United States Senate) in October 1978, and was thereafter nominated to run for the seat left vacant by the untimely death of Senator James Allen of Alabama (Class 3, United States Senate). A similar situation had previously occurred in Minnesota and Advisory Opinion 1978-19 to Congressman Fraser was studiously followed to give direction for such a change in candidacy.

The affidavit should show our compliance with the requirements of that Advisory Opinion and I attach hereto copies of assignment and allocation agreements of the National and State Party committees authorizing our acting as their agent in each of these campaign committees.

I will be glad to furnish any further information or documentation needed to indicate our compliance in this matter, and ask that before any further action is taken that we be given an opportunity for a conference or answer further questions in writing.

Respectfully,

*James F. Schoener*  
James F. Schoener

JFS:cel

Enclosures

P.S. I also enclose a copy of the review by Stan Huckaby, the C.P.A. who checked the items mentioned in the Rodney Smith affidavit.

79040152459





Republican  
National  
Committee

*Good/Perkins*

September 5, 1978

The Honorable Bob Packwood, Chairman  
National Republican Senatorial Committee  
227 Massachusetts Avenue, NE  
Washington, D. C. 20002

Dear Bob:

By this letter the Republican National Committee authorizes the National Republican Senatorial Committee to serve as the agent of the Republican National Committee, for the purpose of making expenditures pursuant to 2 USC S441a (d) (3). Your Committee is authorized to make these expenditures, on behalf of the Republican National Committee, in connection with the general election campaign of James Martin of Alabama.

Under S441a (d) (3) you may spend, on the Republican National Committee's behalf, up to \$10,000 for Mr. Martin.

Best personal regards.

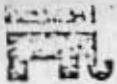
Very truly yours,

*Bill Brock*  
BILL BROCK

BB/bnp

- cc: Bob Moore
- Ben Cotten
- Charlie Black
- Jacque Nystrom
- Matt Wirgau
- Jay Banning

7904015(2)460



Republican  
National  
Committee

Bill Brock  
Chairman

The Honorable Bob Packwood, Chairman  
National Republican Senatorial Committee  
227 Massachusetts Avenue, NE  
Washington, D. C. 20002

Dear Bob:

By this letter the Republican National Committee authorizes the National Republican Senatorial Committee to serve as the agent of the Republican National Committee, for the purpose of making expenditures pursuant to 2 USC S441a(d)(3). Your Committee is authorized to make these expenditures, on behalf of the Republican National Committee, in connection with the general election campaign of Senate Seat 1, Alabama and is in addition to our letter of Sept. 5, 1978, in the amount of \$10,000.

Under S441a(d)(3) you may spend, on the Republican National Committee's behalf, an additional \$52,000 for Mr. Martin, bringing the cumulative total to \$62,000.

Best personal regards.

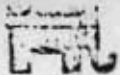
Very truly yours,

*Bill*  
BILL BROCK

BB/bnp

- cc: Bob Moore
- Ben Cotten
- Charlie Black
- Jacque Nystrom
- Jay Banning

79010152461



Republican  
National  
Committee

Bill Brock  
Chairman

The Honorable Bob Packwood, Chairman  
National Republican Senatorial Committee  
227 Massachusetts Avenue, NE  
Washington, D. C. 20002

Dear Bob:

By this letter the Republican National Committee authorizes the National Republican Senatorial Committee to serve as the agent of the Republican National Committee, for the purpose of making expenditures pursuant to 2 USC S441a(d)(3). Your Committee is authorized to make these expenditures, on behalf of general election campaign of Senate Seat #2.

Under S441a(d)(3) you may spend, on the Republican National Committee's behalf, up to \$60,000 for Mr. James Martin, of Alabama.

Best personal regards.

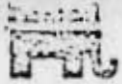
Very truly yours,

BILL BROCK

BB/bnp

cc: Bob Moore  
Ben Cotten  
Charlie Black  
Jacquie Nystrom  
Jay Banning  
Kenny Klinge

79010152462



Republican  
National  
Committee

Bill Brock  
Chairman

The Honorable Bob Packwood, Chairman  
National Republican Senatorial Committee  
227 Massachusetts Avenue, NE  
Washington, D. C. 20002

Dear Bob:

By this letter the Republican National Committee authorizes the National Republican Senatorial Committee to serve as the agent of the Republican National Committee, for the purpose of making expenditures pursuant to 2 USC S441a(d) (3). Your Committee is authorized to make these expenditures, on behalf of the Republican National Committee, in connection with the general election campaign of Senate Seat #2. and is in addition to our letter in the amount of \$60,000.

Under S441a(d) (3) you may spend, on the Republican National Committee's behalf, an additional \$1,000 for Mr. Allen, bringing the cumulative total to \$61,000.

Best personal regards.

Very truly yours,

*Bill Brock*  
BILL BROCK

BB/bnp

- cc: Bob Moore
- Ben Cotten
- Charlie Black
- Jacques Nystrom
- Jay Banning
- Kenny Klinge

7 9 0 1 0 1 5 2 4 6 3



Republican  
National  
Committee

William D. Harris, State Chairman  
Member for Alabama  
P.O. Box 3315  
Birmingham, Alabama 35205  
(205) 322-5733

AGREEMENT BETWEEN  
THE NATIONAL REPUBLICAN SENATORIAL COMMITTEE  
AND THE ALABAMA REPUBLICAN EXECUTIVE COMMITTEE

The National Republican Senatorial Committee, hereinafter known as "Senatorial", agrees with the Alabama Republican Executive Committee, hereinafter known as "State"; as follows:

1. Under the provision of 441 a(d) (3) of Title 2 of the United States Code, State (and its subordinate committees) may make certain expenditures in connection with the general election campaign of the candidate for the office United States Senator for the State of Alabama.
2. Such amount of allowed expenditures under said provision has been computed tentatively by the Federal Election Commission as the amount of \$62,507.00.
3. That State wishes to designate Senatorial its agent for the purpose of making such expenditures up to the amount of \$60,000.00.
4. State agrees to file an allocation statement concerning the amount not assigned to Senatorial as required by the Federal Election Commission Regulation 110.7(c).
5. State agrees to carry out the provisions of such allocation statement and will promptly advise Senatorial at any time that State and its subordinate committees reach 80% of the amount retained by State and a review of this agreement will occur at such time.
6. Senatorial agrees to make such expenditures in behalf of candidate, or if it is in any manner unable to make such expenditures, to promptly release and cancel said agency and reassign such allocated amount to State.

This agreement signed the date opposite the respective parties' name to be effective when signed by both parties.

Dated Aug 22, 1978 1978 at  
Washington, D. C.

National Republican Senatorial Committee

By Robert M. Smith  
Title Treasurer

Dated 11 August 1978 1978 at  
Birmingham, Alabama.

Alabama Republican Executive Committee

By William D. Harris  
Title Chairman

Title Chairman

7 9 0 1 0 1 5 2 4 6 4



Republican  
National  
Committee

William D. Harris, State Chairman  
Member for Alabama  
P.O. Box 3315  
Birmingham, Alabama 35205  
(205) 322-5733

*Agreed*

AGREEMENT BETWEEN  
THE NATIONAL REPUBLICAN SENATORIAL COMMITTEE  
AND THE ALABAMA REPUBLICAN EXECUTIVE COMMITTEE

The National Republican Senatorial Committee, hereinafter known as "Senatorial", agrees with the Alabama Republican Executive Committee, hereinafter known as "State"; as follows:

1. Under the provision of 441 a(d) (3) of Title 2 of the United States Code, State (and its subordinate committees) may make certain expenditures in connection with the special general election campaign of the candidate for the office United States Senator for the State of Alabama unexpired term Place #2.
2. Such amount of allowed expenditures under said provision has been computed tentatively by the Federal Election Commission as the amount of \$62,507.00.
3. That State wishes to designate Senatorial its agent for the purpose of making such expenditures up to the amount of \$62,000.00
4. State agrees to file an allocation statement concerning the amount not assigned to Senatorial as required by the Federal Election Commission Regulation 110.7(c).
5. State agrees to carry out the provisions of such allocation statement and will promptly advise Senatorial at any time that State and its subordinate committees reach 80% of the amount retained by State and a review of this agreement will occur at such time.
6. Senatorial agrees to make such expenditures in behalf of candidate, or if its in any manner unable to make such expenditures, to promptly release and cancel said agency and reassign such allocated amount to State.

This agreement signed the date opposite the respective parties' name to be effective when signed by both parties.

Dated \_\_\_\_\_ 1978 at  
Washington, D. C.

National Republican Senatorial Committee

By *R. L. ASH*

Title *Treasurer*

Dated \_\_\_\_\_ 1978 at  
Birmingham, Alabama

Alabama Republican Executive Committee

By *William D. Harris*

Title *Chairman*

79040152465

Political Financial Services

901 L'Enfant Plaza Center, S.W.  
Washington, D.C. 20024

(202) 554-2206

Stan Huckaby

Re: (202) 554-4670

Federal Campaign  
Financial Consulting Services

October 17, 1978

Rod Smith  
National Republican Senatorial Committee  
227 Massachusetts Avenue, NE  
Washington, DC 20002

Dear Rod,

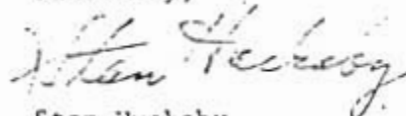
Pursuant to our conversation of last week, I am submitting the following figures to the National Republican Senatorial Committee concerning your limitations on the Jim Martin For Senate Committee.

As you know, Mr. Martin has changed candidacy for election to the United States Senate, and, therefore, under the law, is entering a new election. In accordance with Advisory Opinion 1978-19, we have made an allocation of the "coordinated expenditures" made by the National Republican Senatorial Committee between the first senate race and the second senate race. Of the \$100,000.00 in coordinated expenditures that you have made, \$70,170.55 has been allocated to the first senate campaign, and \$28,458.63 has been allocated to the second campaign. The remaining balance of \$1,370.82 is presently being refunded to you by the vendor. Using A.O. 1978-19, all of your contributions (\$17,500.00 maximum) made to the first senate campaign are non-allocable to the second campaign. Therefore, that limit will begin again. I understand that you have made subsequent contributions to the second senate campaign, and those amounts should be added to the \$28,458.63 in determining the total amount remaining for coordinated expenditures in the second senate campaign. A detailed explanation for this allocation has been telecopied to you by the Jim Martin for Senate Campaign Committee.

All allocations have been made based on the exact amounts of invoices given to us by vendors. Should any of these amounts have a slight variation, we will immediately notify you as to the effects they have on your limitation.

Please feel free to contact me if you have any further questions concerning this matter.

Sincerely,



Stan Huckaby

SH:tmb

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UNITED STATES OF AMERICA  
Before the FEDERAL ELECTION COMMISSION

In the matter of  
NATIONAL REPUBLICAN SENATORIAL COMMITTEE

M.U.R. 820

AFFIDAVIT

City of Washington  
District of Columbia

Rodney A. Smith, being duly sworn deposes and says:

I

That he is the duly appointed treasurer of the National Republican Senatorial Committee of 227 Massachusetts Avenue, N.E., Washington, D.C.

II

That as such treasurer he supervised and directed the making of contributions as allowed by law to Republican candidates for the office of United States Senate in the year 1978.

III

That in such capacity donations of cash (or in-kind) were made to James Martin for Senate (Sparkman seat) from July 11 through August 17th, 1978 in the amount of \$16,493.27 as is shown in our internal records, a copy of which is attached as Exhibit A.

77040152467

IV

That in such capacity donations of cash in the amount of \$17,000 were made to James Martin for Senate (Allen seat) on October 6th and an in-kind contribution of use of video equipment of \$300.00 made on/about October 26th as is shown by our internal records, a copy of which is attached as Exhibit B.

V

That he is informed and believes that such cash expenditures are allowed under the provisions of 2 U.S.C. Section 441a(h).

VI

That in such capacity he supervised and directed the expenditure of funds in behalf of James Martin for Senate (Sparkman seat), as authorized by 2 U.S.C. 441a(d) and as assigned to the National Republican Senatorial Committee by Republican National Committee. Said expenditures in behalf of James Martin for Senate (Sparkman seat) are shown in the attached Exhibit C.

VII

That in such capacity he supervised and directed the expenditure of funds in behalf of James Martin for Senate (Allen seat) as authorized by 2 U.S.C. 441a(d) and as assigned to the National Republican Senatorial Committee by the Republican National Committee. Said expenditures in behalf of James Martin for Senate (Allen seat) are shown in the attached Exhibit D. As shown in said Exhibits C and D, a credit for funds or materials transferred from James Martin for Senate (Sparkman seat) to James Martin for Senate (Allen seat) in the amount of \$28,458.63 was made on October 2, 1978.

79040152468



an on-site review of credits of cash and in-kind contributions transferred from the first committee to the second.

XII

Further deponent saith not.

*Rodney A. Smith*

Rodney A. Smith  
Treasurer, National Republican  
Senatorial Committee

Sworn to and subscribed before me a notary public in and for the District of Columbia this 11 day of January 1979.

*Donald M. Lane*

Notary Public  
My commission expires 3-31-83

79040152469

VIII

That he is informed and believes that such agency agreements are proper and correct and that the same were in accordance with Commission Regulations # 110.7 and Advisory Opinion 1976-108.

IX

That he supervised and directed the expenditures for James Martin for Senate (Sparkman seat) and James Martin for Senate (Allen seat) as were assigned by allocation agreements from the Alabama (State) Republican Executive Committee, such expenditures being shown on the aforesaid Exhibits C and D.

X

That he is informed and believes that all such transactions were made properly and in accordance with Commission Advisory Opinion 1978-19 "Contributions to Two Campaigns by One Candidate" made in connection with the Fraser for Senate Campaigns, and that the Martin Campaigns are indistinguishable in all material aspects from said Fraser situation.

XI

That in order to make sure that all proper credits were made for cash or credits transferred from the Martin Committee (Sparkman seat) to the Martin Committee (Allen seat), the National Republican Senatorial Committee required a certified public accountant to make

79040152470

CANDIDATE: TIM MARTIN

DATE	DESCRIPTION	R.S.C. CK NO	RNC-RSC SECT. 401 EXPENDED	CONTRIBUTION BALANCE
	LEGAL LIMIT			17,500.
7 11		TRUST ACCOUNT	x \$ 5,000.- ✓	12,500.
7 25	Holmes Kennedy, Oye + Bell	TRUST ACCOUNT	x \$ 2,500.- ✓	10,000.
6 19	Morris Tom Bell		x \$ 137.- x	9,803.
8 4	Contributions	TRUST ACCOUNT	x \$ 8,000.- ✓	1,803.
8 27	Contributions	TRUST	x \$ 796.27 ✓	1,006.73

# EXHIBIT A

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DATE	DESCRIPTION	RSC CK. No.	RNC-RSC SECT. 441 CONTRIBUTION Expended	BALANCE	
	Legal Limit			17,500	1
10 6	Carla's Contribution	Toward	\$1,700	500	4
10 26	Use of Video Eq. used by com		\$350	200	6
EXHIBIT B					12
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CANDIDATE: JIM MARTIN

DATE	DESCRIPTION	RSC		SECTION 441 EXPENDITURES	
		CK	NATIONAL	STATE	BALANCE
		No.	Extended	Extended	BALANCE
1	LEGAL LIMIT		62500		62500
2	9 1 Daniels Assoc Trust			25000	
3	9 14 Daniel & Assoc Trust			25000	
4	9 29 Chris Ford Trust				10000
5	10 20 Helms-Kennedy Trust		25458.55		
6	7 19 John H. Friendly		30000		
7	10 5 Credit for Daniels & Assoc		13705.27		39629.45
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EXHIBIT C



CANDY DE: ~~...~~ Martin

DATE	DESCRIPTION	RSC CK. No.	SECTION 441 EXPENDITURES	
			NATIONAL EXPENDED	STATE EXPENDED
	Level Limit Authority PNC		62500	62500
10 2	Transferred from Ruse #1	2045063x		
10 6	Holder-Kennedy Trust/ins			66000x
	65,000 Bond		65000x	2000
10 19	Holder-Kennedy Trust/ins			
	Total WML 29500		627500x	4137
10 26	Eastern Airlines	3871	2667x	
			1470	
<p>NOTE: There is an 1/2 bill for CTR for services for in Martin County - (2005) amount is 29500.00 - 1/2 amount is 14750.00</p>				

EXHIBIT D

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FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. James F. Schoener  
Jenkins, Nystrom & Sterlacchi, P.C.  
2033 M Street, N. W.  
Washington, D. C. 20036

Re: MUR 820

Dear Mr. Schoener:

The Commission is continuing its investigation in the above-referenced matter. In this regard, the Commission, on April , 1979, found reason to believe that the National Republican Senatorial Committee may have violated 2 U.S.C. § 434 by reporting expenditures made in connection with the Alabama Senatorial primary, and one said expenditure made prior to the time NRSC was the designated agent of RNC, as coordinated expenditures under 2 U.S.C. § 441a(d), 11 C.F.R. § 110.7(a)(4).

Attached is a set of interrogatories, answers to which will assist the Commission in resolving this matter. The interrogatories relate to the fact that NRSC has reported two expenditures, one of \$3,000 on July 19, 1978, and one of \$25,000 on September 1, 1978, as § 441a(d) coordinated expenditures. The Alabama primary was held on September 5, 1978 and the date of the first letter of authorization from the RNC was September 5, 1978. In addition, the Commission is seeking further facts relating to the \$50,000 expenditure made on October 2, 1978, part of which was allocated to the Sparkman Senate seat campaign and part to the Allen Senate seat campaign.

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Mr. James F. Schoener  
Page Two

Please answer the attached Interrogatories and return them to the Commission within ten (10) days of your receipt of this letter. The attorney assigned to this matter is Kathleen Imig Perkins, (202)523-4175. Please contact Ms. Perkins if you have questions concerning MUR 820.

Sincerely,

William C. Oldaker  
General Counsel

Enclosures

79040152476

INTERROGATORIES - SCHOENER - MUR 820

1. State the purpose of NRSC's expenditure of \$3,000 on July 19, 1978, reported as a §441a(d) coordinated expenditure in connection with the Alabama general election campaign of James Martin for U.S. Senate.
2. How was this expenditure related to the general election when the Alabama primary was not held until September 5, 1978 and the runoff was not held until September 26, 1978? Was NRSC the designated agent of RNC (for the purpose of §441a(d) expenditures) as of July 19, 1978?
3. State the purpose of NRSC's expenditure of \$25,000 on September 1, 1978, reported as a §441a(d) coordinated expenditure in connection with the Alabama general election campaign of James Martin for U.S. Senate.
4. Relate this expenditure to the general election.
5. State the purpose of the expenditure made by NRSC on October 2, 1978 in the amount of \$50,000.
6. What method was utilized to allocate part of this expenditure to the Martin S<sub>1</sub> campaign and part to the S<sub>2</sub> campaign.
7. Were any media materials, developed using S<sub>1</sub> NRSC coordinated expenditures, utilized in the S<sub>2</sub> campaign? If so, was an amount allocated to S<sub>2</sub> for purchase of said materials?
8. Please submit any materials or documentation in support of your answers to the above questions.

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REPORTS ANALYSIS REFERRAL UPDATE

\*ORIGIN: OGC

DATE April 2, 1979 ANALYST Dug Greevy  
 TO: Office of General Counsel TEAM CHIEF Peggy Sims *Peggy Sims*  
 ATTENTION: Kathy Perkins  
 THROUGH: STAFF DIRECTOR *JP* COMPLIANCE REVIEW CBorn  
 FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS *JH*

MUR No. 820 DATE OF ORIGINAL REFERRAL 12-13-78

**\*\*PURPOSE:** At the direction of the Commission, the Reports Analysis Division sent the National Republican Senatorial Committee-Expenditures several Requests for Additional Information asking for clarifications regarding the committee's reporting of in-kind contributions on Schedule B, Line 22(c). The committee responded and a telephonic conversation was initiated by this Division regarding that response. Please see previous Update.

In response to the conversation of 2/28/79, the committee submitted on 3/13/79 amendments to the August Monthly through 30 Day Post-General Election Reports. These amendments are here attached.

**OUTCOME:** (if applicable)

1. Committee reported as in-kind contributions several coordinated expenditures.
2. Committee reported as operating expenditures several in-kind contributions. Entries were made under both Line 20 and Line 22(c). The notations therefore of in-kind contributions made to non-incumbent senatorial candidates, as reported on Line 20, were reported as well on Line 22(c). However, several of these in-kind contributions should have been reported as coordinated expenditures, and these have been corrected within the amendments.
3. An expenditure, reported on Line 20 with the notation of support for Durenberger, which did not appear on either Line 22(c) or Line 24, has been allocated as a coordinated expenditure made on behalf of Durenberger in the amount of \$128.25.
4. An expenditure, reported on Line 20 with the notation of support for Durenberger has been corrected to show support for Cochran. This entry previously supported an entry on Line 22(c) indicating an in-kind contribution made to Cochran, but this has been corrected to indicate that a coordinated expenditure was made on behalf of Cochran in the amount of \$8,929.80.

Note: The Data Base presently includes these corrections.  
 \*Commission unit which initiated original Referral (e.g. AUDIT/RAD/OGC).

**\*\*INFORMATION, or RESULTS OF RAD ACTION, as appropriate.**

79040152478





# National Republican Senatorial Commission

FILED  
COMMISSION

'79 MAR 15 PM 12:16

Senator Bob Packwood  
Chairman, Oregon

**MEMBERS**

- Sen. Howard H. Baker, Jr., Tenn.
- Sen. John H. Chafee, R. I.
- Sen. Barry Goldwater, Ariz.
- Sen. Orin G. Hatch, Utah
- Sen. S. I. Hayakawa, Calif.
- Sen. H. John Heinz III, Penn.
- Sen. Charles McC. Mathias, Jr., Md.
- Sen. William V. Roth, Jr., Del.
- Sen. Harrison Schmidt, N. M.
- Sen. Richard S. Schweiker, Penn.
- Sen. Robert T. Stafford, Vermont
- Sen. Milton R. Young, N. Dak.

March 13, 1979

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

Dear Mr. Greevy:

In response to your letter dated January 29, 1979, concerning the October 20 Monthly Report, and the 10 Day Pre General Report, we are enclosing revised schedules of In-Kind Contributions and Allocated Expenditures shown as memo items on Lines 22(c) and 24 respectively of Page 2, FEC Form 3 for the August 20 Monthly Report.

If you have any questions regarding this matter, feel free to contact me.

Sincerely,

Rodney A. Smith  
Treasurer

RAS:lec  
Enclosures

7 7 9 9 3 1 3 2 4 7 6

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

**NAME OF CANDIDATE OR COMMITTEE** National  
Republican Senatorial Committee-Expenditures

**REPORT COVERING THE PERIOD** 1a  
**FROM:** July 1 **TO:** July 31, 1978

RECEIPTS		Column A This Period	Column B Calendar Year-To-Date
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 (\$ _____ )			
(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 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 . . . . .	\$ . . . . .		\$ . . . . .
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 . . . . .	\$ . . . . .		\$ . . . . .
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 committees (Itemize on Schedule B regardless of amount) . . . . .	\$ . . . . .		
(c) Contributions in-kind to other committees (Itemize on Schedule B regardless of amount). . . . .	\$ . . . . .	MEMO 1,988.69	
(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) . . . . .	\$ . . . . .		\$ . . . . .
		MEMO TOTAL - \$ 4,471.00	
25. Total Expenditures . . . . .	\$ . . . . .		\$ . . . . .
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) . . . . .	\$ . . . . .		

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 Washington, D.C. 20463

**ITEMIZED EXPENDITURES**

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

Page 2 of 2 for  
 Line Number 22(c)

(Use Separate Schedules for  
 each numbered line)

Name of Candidate or Committee in Full			
National Republican Senatorial Committee-Expenditures			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Steven Saunders Nat'l. Republican Senatorial Comm 227 Massachusetts Ave., N.E. Washington, D. C. 20002	In-Kind Contribution-Re-elect Thurmond Committee-So. Carolina <u>Media Consulting</u> Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	June '78	\$ 15.00
Mary Mower Nat'l. Republican Senatorial Comm 227 Massachusetts Ave., N. E. Washington, D. C. 20002	In-Kind Contribution-Re-elect Thurmond Committee-So. Carolina <u>Typist, Clerical assistance</u> Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	June '78	58.50
Bob Gabordi 212 Union Street Providence, Rhode Island 02903	In-Kind Contribution-Reynolds for U.S. Senate-Rhode Island <u>Fee - Campaign School</u> Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	7-28-78	20.00
Sandra Carlson 212 Union Street Providence, Rhode Island 02903	In-Kind Contribution-Reynolds for U.S. Senate-Rhode Island <u>Fee - Campaign School</u> Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	7-28-78	20.00
Eleanor Danforth Nat'l. Republican Senatorial Comm 227 Massachusetts Ave., N. E. Washington, D. C. 20002	In-Kind Contribution-Re-elect Thurmond Committee-So. Carolina <u>Typing/Clerical assistance</u> Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	June '78	30.00
Tony Payton 1127 Independence Ave., S. E. Washington, D. C. 20003	In-Kind Contribution-Shasteen for Senate - Nebraska <u>Political Consulting</u> Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	July '78	75.00
Tony Payton 1127 Independence Ave., S. E. Washington, D. C. 20003	In-Kind Contribution-Simpson for Senate - Wyoming <u>Political Consulting</u> Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	July '78	50.00
United Airlines Dept. 745711 P. O. Box 36022M Pittsburgh, Pennsylvania 15250	In-Kind Contribution - Helms for Senate - North Carolina <u>Air Travel</u> Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	July '78	181.00
SUBTOTAL of expenditures this page (optional)		MEMO SUBTOTAL	\$ 449.50
TOTAL this period (last page this line number only)		MEMO TOTAL	\$ 1,988.69

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 Washington, D.C. 20463

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

Page 1 of 2 for  
 Line Number 22(c)  
 (Use Separate Schedules for  
 each numbered line)

7 379923 1-25 1-53 619

Name of Candidate or Committee in Full			
National Republican Senatorial Committee-Expenditures			
Full Name, Mailing Address and ZIP Code Christopher D. Lord 5401 Westbard Avenue Apt. #1507 Bethesda, Maryland 20016	Particulars of Expenditure In-Kind Contribution-Baxter for Senate - Delaware Research Services Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year) June '78	Amount of each expendi- ture this period \$ 250.00
Full Name, Mailing Address and ZIP Code Christopher D. Lord 5401 Westbard Avenue Apt. #1507 Bethesda, Maryland 20016	Particulars of Expenditure In-Kind Contribution-Venema for Senate - Delaware Research Services Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year) June '78	Amount of each expendi- ture this period 250.00
Full Name, Mailing Address and ZIP Code Christopher D. Lord 5401 Westbard Avenue Apt. #1507 Bethesda, Maryland 20016	Particulars of Expenditure In-Kind Contribution-Friends of Roger Jepsen - Iowa Research Services Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year) June '78	Amount of each expendi- ture this period 280.00
Full Name, Mailing Address and ZIP Code Christopher D. Lord 5401 Westbard Avenue Apt. #1507 Bethesda, Maryland 20016	Particulars of Expenditure In-Kind Contribution-Jacobsen for Senate-New Hampshire Research Services Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year) June '78	Amount of each expendi- ture this period 46.67
Full Name, Mailing Address and ZIP Code Christopher D. Lord 5401 Westbard Avenue Apt. #1507 Bethesda, Maryland 20016	Particulars of Expenditure In-Kind Contribution-Masiello for Senate - New Hampshire Research Services Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year) June '78	Amount of each expendi- ture this period 46.66
Full Name, Mailing Address and ZIP Code Christopher D. Lord 5401 Westbard Avenue Apt. #1507 Bethesda, Maryland 20016	Particulars of Expenditure In-Kind Contribution-Humphrey for Senate - New Hampshire Research Services Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year) June '78	Amount of each expendi- ture this period 46.67
Full Name, Mailing Address and ZIP Code James Schoener Jenkins, Nystrom & Sterlacci, P.C. 2033 M Street, N. W. Washington, D. C. 20036	Particulars of Expenditure In-Kind Contribution-Committee for Sen. Griffin - Michigan Legal Services Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year) June '78	Amount of each expendi- ture this period 400.00
Full Name, Mailing Address and ZIP Code Communications Corporation of America #1 Direct Marketing Plaza Boston, Virginia 22713	Particulars of Expenditure In-Kind contribution-People for Boschwitz - Minnesota Printing services Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year) June '78	Amount of each expendi- ture this period 219.19
SUBTOTAL of expenditures this page (optional)		MEMO-SUBTOTAL	\$ 1,539.19
TOTAL this period (last page this line number only)			\$



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Washington, D.C. 20463

These are memo items only and are also shown on Line 20(a) as expenditures  
**ITEMIZED COORDINATED EXPENDITURES MADE BY POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S) ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE (2 U.S.C. 441a(d))**  
 (Supporting Line 24, FEC Form 3)

Page 1 of 2  
 For Line 24, FEC Form 3

(To be used only by Political Committees in the General Election)

7 279 100 1522 1458 320

Name of Political Committee in Full				
National Republican Senatorial Committee-Expenditures				
Has your Committee been designated to make coordinated expenditures by a political party committee? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO				
If YES, name the designating committee: Republican National and/or Respective State Committees				
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
All-In-One Travel 600 Pennsylvania Ave., S.E. Washington, D. C. 20003	Roger Jepsen United States Senate Iowa	7AC 6 Air Travel	July '78	\$ 157.00
	Aggregate General Election Expenditure for this Candidate - \$			
All-In-One Travel 600 Pennsylvania Ave., S.E. Washington, D.C. 20003	Thad Cochran United States Senate Mississippi	24 C 3 Air Travel	July '78	157.00
	Aggregate General Election Expenditure for this Candidate - \$			
All-In-One Travel 600 Pennsylvania Ave., S.E. Washington, D.C. 20003	Rudy Boschwitz United States Senate Minnesota	7AC 7 Air Travel	July '78	157.00
	Aggregate General Election Expenditure for this Candidate - \$			
James Schoener Jenkins, Nystrom & Sterlacci 2033 M Street, N. W. Washington, D. C. 20036	Larry Pressler United States Senate South Dakota	27 C 6 Legal Services	July '78	200.00
	Aggregate General Election Expenditure for this Candidate - \$			
James Schoener Jenkins, Nystrom & Sterlacci, P. C. 2033 M Street, N. W. Washington, D. C. 20036	Bob Griffin United States Senate Michigan	24 C 6 Legal Services	June '78	600.00
	Aggregate General Election Expenditure for this Candidate - \$			
SUBTOTAL of expenditures this case (optional) MEMO SUBTOTAL				\$ 1,271.00
TOTAL this period (last page number only)				\$



1978  
Election Commission  
1400 A Street, N.W.  
Washington, D.C. 20463

shown on Line 20(a) as expenditures

**ITEMIZE COORDINATED EXPENDITURES MADE BY  
POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S)  
ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE  
(2 U.S.C. 441a(d))  
(Supporting Line 24, FEC Form 3)**

Page 2 of 2

For Line 24, FEC Form 3

(To be used only by Political Committees in the General Election)

Name of Political Committee in Full

National Republican Senatorial Committee-Expenditures

Has your Committee been designated to make coordinated expenditures by a political party committee?  YES  NO  
If YES, name the designating committee: Republican National and/or Respective State Committees

Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
James Schoener Jenkins, Nystrom & Sterlacci, P. C. 2033 M Street, N. W. Washington, D. C. 20036	Bob Griffin United States Senate Michigan	Legal Services	June '78	\$ 1,600.00
	Aggregate General Election Expenditure for this Candidate - \$			

Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
James Schoener Jenkins, Nystrom & Sterlacci, P. C. 2033 M Street, N. W. Washington, D. C. 20036	John Tower United States Senate Texas	Legal Services	June '78	1,200.00
	Aggregate General Election Expenditure for this Candidate - \$			

Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
James Schoener Jenkins, Nystrom & Sterlacci, P. C. 2033 M Street, N. W. Washington, D. C. 20036	Larry Pressler United States Senate South Dakota	Legal Services	June '78	400.00
	Aggregate General Election Expenditure for this Candidate - \$			

Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Aggregate General Election Expenditure for this Candidate - \$				

Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Aggregate General Election Expenditure for this Candidate - \$				

SUBTOTAL of expenditures this page (optional) ..... MEMO SUBTOTAL ..... \$ 3,200.00  
TOTAL this period (last page this line number only) ..... MEMO TOTAL ..... \$ 4,471.00

7 2709 19001 15221458342 1



# National Republican Senatorial Commission

RECEIVED  
COMMISSION

'79 MAR 15 PM 12:16

Senator Bob Packwood  
Chairman, Oregon

**MEMBERS**

- Sen. Howard H. Baker, Jr., Tenn.
- Sen. John H. Chafee, R. I.
- Sen. Barry Goldwater, Ariz.
- Sen. Orrin G. Hatch, Utah
- Sen. S. I. Hayakawa, Calif.
- Sen. H. John Heinz III, Penn.
- Sen. Charles McC. Mathias, Jr., Md.
- Sen. William V. Roth, Jr., Del.
- Sen. Harrison Schmitt, N. M.
- Sen. Richard S. Schweiker, Penn.
- Sen. Robert T. Stafford, Vermont
- Sen. Milton R. Young, N. Dak.

March 13, 1979

Rodney A. Smith  
Treasurer

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

Dear Mr. Greevy:

In response to your letter dated December 22, 1978, concerning the September 20 Monthly Report for the period covering August 1 through August 31, 1978, we have enclosed the following:

- a. Revised schedules of In-Kind Contributions and Allocated Expenditures shown as memo items on Lines 22(c), and 24 respectively, of Page 2, FEC Form 3.
- b. Schedule C, showing the debt owed to the National Republican Congressional Committee as of August 31, 1978.

If you have any further questions concerning this matter, please feel free to contact me.

Sincerely,  
*Rodney A. Smith*  
Rodney A. Smith  
Treasurer

RAS:lec  
Enclosures

7 97 09 0 93 11 32 21 48 39 5

**AMENDED**  
**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)

AM 3  
 480  
 1978  
 Federal Election Commission  
 1125 K Street, N.W.  
 Washington, D.C. 20463

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 National Republican Senatorial Committee-  
 Name of Candidate or Committee (in full) Expenditures  
227 Massachusetts Ave., N. E.  
 Address (number and street)  
Washington, D. C. 20002  
 City, State and ZIP Code

2 I.D. No. C00027466  
 Candidate/Committee

3 \_\_\_\_\_  
 Office Sought, State/District (if applicable)

Check if address is different than previously reported. Year of Election \_\_\_\_\_

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 August (month) on \_\_\_\_\_ (date) in the State of \_\_\_\_\_

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

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

Termination Report  
 Amendment for: \_\_\_\_\_ (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 <u>August 1</u> Through <u>August 31, 1978</u>	Column A This Period	Column B Calendar Year-To-Date
6 Cash on hand January 1, 19 .....		\$
7 Cash on hand at beginning of reporting period .....	\$	
8 Total receipts (from line 19) .....	\$	\$
(a) Subtotal (Add lines 7 and 8 for Column A and lines 6 and 8 for Column B) .....	\$	\$
9 Total expenditures (from line 25) .....	\$	\$
10 Cash on hand at close of reporting period (Subtract line 9 from line 8a) .....	\$	\$
11 Value of contributed items on hand to be liquidated (Attach itemized list) .....	\$	
12 Debts and obligations owed to the Committee/Candidate (itemize all on Schedule C) .....	\$	
13 Debts and obligations owed by the Committee/Candidate (itemize all on Schedule C) .....	\$ 45,000.00	

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

9-20-78 (Date) Rodney A. Smith, Treasurer (Typed Name of Treasurer or Candidate) Rodney A. Smith (Signature of Treasurer or Candidate)

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

For further information, Contact:



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

or call 800/424-9530

Approved by GAO  
 B-187620 (R0506)  
 Expires 3-31-81

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

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

7 2 9 to D-1, 5, 2, 4, 8, 6, 9

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

NAME OF CANDIDATE OR COMMITTEE: **National Republican Senatorial Committee-Expenditures**

REPORT COVERING THE PERIOD FROM: **August 1** TO: **August 31, 1978** 1b

**RECEIPTS**

	Column A This Period	Column B Calendar Year-To-Date
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 (\$ _____ )		
(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 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 . . . . .	\$ . . . . .	\$ . . . . .
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 . . . . .	\$ . . . . .	\$ . . . . .

**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 committees (itemize on Schedule B regardless of amount) . . . . .	\$ . . . . .	
(c) Contributions in-kind to other committees (itemize on Schedule B regardless of amount) . . . . . <b>Memo Item</b>	\$ . . . . . <b>4,263.22</b>	
(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) . . . . . <b>Memo Total - \$ 1,673.82</b>	\$ . . . . .	\$ . . . . .
25. Total Expenditures . . . . .	\$ . . . . .	\$ . . . . .

**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) . . . . .	\$ . . . . .	



FILED  
 FEB. 1978  
 Federal Election Commission  
 125 K Street, N.W.  
 Washington, D.C. 20463

August

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

Page 1 of 1 for  
 Line Number 22(c)

(Use Separate Schedules for  
 each numbered line)

79701071521138397

Name of Candidate or Committee in Full			
National Republican Senatorial Committee-Expenditures			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Communications Corporation of America #1 Direct Marketing Plaza Boston, Virginia 22713	In-Kind Contribution-Griffin for Senate - Michigan <u>Computer work</u> Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	8/21/78	\$ 729.63
United Airlines Dept. 745711 P. O. Box 36022M Pittsburgh, Pennsylvania 15250	In-Kind Contribution-Helms for Senate - North Carolina <u>Air Fare</u> Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	8/7/78	265.00
United Airlines Dept. 745711 P. O. Box 36022M Pittsburgh, Pennsylvania 15250	In-Kind Contribution - Boschwitz for Senate - Minnesota - <u>Air Fare</u> Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	8/7/78	206.00
Jenkins, Nystrom & Sterlacci, P.C. 2033 M Street, N. W. Washington, D. C. 20036	In-Kind Contribution-Griffin for Senate - Michigan <u>Legal services</u> Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	8/21/78	1,848.78
Federal Express Corporation 2900 South Eads Arlington, Virginia	In-Kind Contribution-Pressler for Senate - South Dakota <u>Express delivery service</u> Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	8/4/78	26.31
Roger Ailes & Associates 230 Central Park South New York, New York 10019	In-Kind Contribution-Reynolds for Senate - Rhode Island <u>Media Critique</u> Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	7/12/78	1,187.50
SUBTOTAL of expenditures this page (optional)			\$
TOTAL this period (last page this line number only)			MEMO TOTAL \$ 4,263.22

These are Memo Items only.

ITEMIZE COORDINATED EXPENDITURES MADE BY  
POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S)  
ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE  
(2 U.S.C. 441a(d))  
(Supporting Line 24, FEC Form 3)

Page 1 of 1

For Line 24, FEC Form 3

(To be used only by Political Committees in the General Election)

JLE P  
MAY 1978  
FEDERAL Election Commission  
15 K Street, N.W.  
Washington, D.C. 20463

Name of Political Committee in Full

National Republican Senatorial Committee-Expenditures

Has your Committee been designated to make coordinated expenditures by a political party committee?  YES  NO

If YES, name the designating committee: Republican National and/or Respective State Committees

Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Communications Corporation of America #1 Direct Marketing Plaza Boston, Virginia 22713	Howard Baker United States Senate Tennessee	2/12 G Computer Work 23-7-77	8/7/78	\$ 185.00
Aggregate General Election Expenditure for this Candidate -- \$				
Jenkins, Nystrom & Sterlacci, P. C. 2033 M Street, N. W. Washington, D. C. 20036	John Tower United States Senate Texas	2/12 G Legal Services 23-7-77	8/21/78	1,308.82
Aggregate General Election Expenditure for this Candidate -- \$				
Jenkins, Nystrom & Sterlacci, P. C. 2033 M Street, N. W. Washington, D. C. 20036	Larry Pressler United States Senate South Dakota	2/12 G Legal Services 23-7-77	8/28/78	60.00
Aggregate General Election Expenditure for this Candidate -- \$				
Jenkins, Nystrom & Sterlacci, P. C. 2033 M Street, N. W. Washington, D. C. 20036	Ed Brooke United States Senate Massachusetts	2/12 G Legal Services 23-7-77	8/30/78	120.00
Aggregate General Election Expenditure for this Candidate -- \$				
Aggregate General Election Expenditure for this Candidate -- \$				
SUBTOTAL of expenditures this page (optional)				\$
TOTAL this period (last page this line number only)				MEMO TOTAL \$ 1,673.82

7 9709 400711 522148099 B

FEC  
 AED  
 NOV. 1978  
 Federal Election Commission  
 125 K Street, N.W.  
 Washington, D.C. 20463

**DEBTS AND OBLIGATIONS**  
 Supporting Line Numbers 12 and 13  
 of FEC FORM 3

Page 1 of 1 for  
 Line Number 13

(Use Separate Schedules for  
 each numbered line)

(Indicate Primary or General Election for each Entry)

Name of Candidate and Committee in Full

National Republican Senatorial Committee-Expenditures

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
National Republican Congressional Committee 512 House Office Building Annex Washington, D. C. 20515	1977	\$ 75,000.00	\$ 30,000.00	\$ 45,000.00
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other				

NATURE OF OBLIGATION (Details of Debt):

Loan Repayment

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) . . . . .	\$ 75,000.00	\$ 30,000.00	\$ 45,000.00

Carry outstanding balance only to appropriate line of summary.

7 9709400 1 5249000



# National Republican Senatorial Commission

RECEIVED  
FEDERAL ELECTION  
COMMISSION

'79 MAR 15 PM 12:17

Senator Bob Packwood  
Chairman, Oregon

MEMBERS

- Mr. Howard H. Baker, Jr., Tenn.
- Mr. John H. Chafee, R. I.
- Mr. Barry Goldwater, Ariz.
- Mr. Orrin G. Hatch, Utah
- Mr. S. I. Hayakawa, Calif.
- Mr. H. John Heinz III, Penn.
- Mr. Charles McC. Mathias, Jr., Md.
- Mr. William V. Roth, Jr., Del.
- Mr. Harrison Schmitt, N. M.
- Mr. Richard S. Schweiker, Penn.
- Mr. Robert T. Stafford, Vermont
- Mr. Milton E. Young, N. Dak.

March 12, 1979

Mr. David Greevy  
Federal Election Commission  
1325 K Street, Northwest  
Washington, D. C. 20463

301521

Dear Mr. Greevy:

In response to your letters dated December 22, 1978 concerning the September 20 Monthly Report, and January 29, 1979 concerning the October 20 Monthly Report, and the 10 Day Pre General Report, we have enclosed the following:

- (a) Schedule "C", showing the debt owed to the National Republican Congressional Committee as of September 30, 1978.
- (b) A revised copy of Page 16 of 23 of Line 20(a).
- (c) Revised schedules of In-kind contributions and allocated expenditures shown as memo items on Lines 22(c), and 24 respectively for Page 2, FEC Form 3.

All items relate to the September 20 Monthly Report.

If you have any further questions concerning this matter, please do not hesitate to call.

Sincerely,

Rodney A. Smith  
Treasurer

RAS:lec  
Enclosures

77 99 5 9 12 5 2 4 9 1



Form 3  
 FEB 1978  
 Federal Election Commission  
 1325 K Street, N.W.  
 Washington, D.C. 20463

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

RECEIVED  
 FEDERAL ELECTION  
 COMMISSION

(Except for Candidates or Committees Receiving Federal Matching Funds)

1978 OCT 15 PM 12:17

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 National Republican Senatorial Committee-  
 Name of Candidate or Committee (in full) Expenditures  
227 Massachusetts Ave., N. E.  
 Address (number and street)  
Washington, D. C. 20002  
 City, State and ZIP Code

2 I.D. No. C00027466  
 Candidate/Committee  
 3 \_\_\_\_\_  
 Office Sought, State/District (if applicable)  
 Year of Election \_\_\_\_\_

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 September on \_\_\_\_\_ in the State of \_\_\_\_\_  
 (month) (date)  
 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>Sept. 1</u> Through <u>Sept. 30, 1978</u>		
6 Cash on hand January 1, 19 .....		\$
7 Cash on hand at beginning of reporting period .....	\$	
8 Total receipts (from line 19) .....	\$	\$
(a) Subtotal (Add lines 7 and 8 for Column A and lines 6 and 8 for Column B) .....	\$	\$
9 Total expenditures (from line 25) .....	\$	\$
10 Cash on hand at close of reporting period (Subtract line 9 from line 8a) .....	\$	\$
11 Value of contributed items on hand to be liquidated (Attach itemized list) .....	\$	
12 Debts and obligations owed to the Committee/Candidate (itemize all on Schedule C) .....	\$	
13 Debts and obligations owed by the Committee/Candidate (itemize all on Schedule C) .....	\$ 25,000.00	

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

Oct. 20, 1978  
 (Date)

Rodney A. Smith, Treasurer  
 (Typed Name of Treasurer or Candidate)

Rodney A. Smith  
 (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 9530

Approved by GAO  
 B-187620 (R0506)  
 Expires 3-31-81

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

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

7 779 104 1522 14-9 303

**DETAILED SUMMARY OF RECEIPTS AND EXPENDITURES**

(Page 2, FEC FORM 3)

NAME OF CANDIDATE OR COMMITTEE **National Republican Senatorial Committee-Expenditures**

REPORT COVERING THE PERIOD 1.c  
 FROM: **Sept. 1** TO **Sept. 30, 1978**

RECEIPTS	Column A This Period	Column B Calendar Year-To-Date
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 (\$ _____ )		
(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 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 .....	\$ .....	\$ .....
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 .....	\$ .....	\$ .....
<b>EXPENDITURES</b>		
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 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 .....	\$ .....	\$ .....
23. Independent Expenditures (use Schedule E) .....	\$ .....	\$ .....
24. Coordinated Expenditures Made by Political Committees (2 U.S.C. 441a(d)) (Itemize on Schedule F) .....	\$ .....	\$ .....
MEMO TOTAL .....	\$ .....	\$ .....
25. Total Expenditures .....	\$ .....	\$ .....
<b>RECEIPTS AND EXPENDITURES, NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES</b>		
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) .....	\$ .....	

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5

7

MEMO

660.67

MEMO TOTAL \$25,586.05

Electoral Commission  
 Street, N.W.  
 Washington, D.C. 20463

**DEBTS AND OBLIGATIONS**  
**Supporting Line Numbers 12 and 13**  
**of FEC FORM 3**

(Use Separate Schedules for  
 each numbered line)

(Indicate Primary or General Election for each Entry)

Name of Candidate and Committee in Full

National Republican Senatorial Committee-Expenditures

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
National Republican Congressional Committee 512 House Office Building Annex Washington, D. C. 20515	1977			
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		\$ 75,000.00	\$ 50,000.00	\$ 25,000.00

NATURE OF OBLIGATION (Details of Debt):

Loan repayment

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) . . . . .	\$ 75,000.00	\$ 50,000.00	\$ 25,000.00

Carry outstanding balance only to appropriate line of summary.

738981324945

1978  
 Election Commission  
 444 Street, N.W.  
 Washington, D.C. 20463

**ITEMIZED EXPENDITURES**

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

Page 16 of 23 for  
 Line Number 20(a)

(Use Separate Schedules for  
 each numbered line)

7 0700 400 11 522 459 350 6

Name of Candidate or Committee in Full			
National Republican Senatorial Committee-Expenditures			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Automated Business Mail 5515 Livingston Road, S. E. Washington, D. C. 20021	Typing services Dave Durenberger, U.S. Senate Minnesota - \$128.25	9-26-78	\$ 2,090.05
Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Communications Corporation of America #1 Direct Marketing Plaza Boston, Virginia 22713	Direct Mail services Thad Cochran, U. S. Senate Mississippi	9-27-78	8,929.80
Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other			
SUBTOTAL of expenditures this page (optional)			\$
TOTAL this period (last page this line number only)			\$



SEPTEMBER

**EXPENSES**

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

Page 1 of 1 for  
Line Number 22(c)

(Use Separate Schedules for each numbered line)

1978  
Election Commission  
Street, N.W.  
Washington, D.C. 20463

Name of Candidate or Committee in Full

National Republican Senatorial Committee-Expenditures

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Rodney A. Smith 4836 South 28th Street Arlington, Virginia 22206	In-kind contribution-Durenberger for Senate - Minnesota Consulting expenses Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	Aug. '78	\$ 576.67
United Airlines Dept. 745711 P. O. Box 36022M Pittsburgh, Pennsylvania 15250	In-kind contribution - Helms for Senate-North Carolina Air Fare Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	Aug. '78	84.00

SUBTOTAL of expenditures this page (optional) \$  
TOTAL this period (last page this line number only) MEMO TOTAL \$ 660.67

shown on Line 20(a) as expenditures.

**ITEMIZED COORDINATED EXPENDITURES MADE BY  
POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S)  
ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE  
(2 U.S.C. 441a(d))  
(Supporting Line 24, FEC Form 3)**

Page 1 of 3

For Line 24, FEC Form 3

(To be used only by Political Committees in the General Election)

Commission  
Street, N.W.  
Washington, D.C. 20463

Name of Political Committee in Full

National Republican Senatorial Committee-Expenditures

Has your Committee been designated to make coordinated expenditures by a political party committee?  YES  NO

If YES, name the designating committee: Republican National and/or Respective State Committees

Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
United Airlines Dept. 745711 P. O. Box 36022M Pittsburgh, Pennsylvania 15250	Nancy Kassebaum United States Senate Kansas	Air Travel	Aug. '78	\$ 305.00
	Aggregate General Election Expenditure for this Candidate - \$			
The Postmaster U. S. Postal System	Don Shastoen United States Senate Nebraska	Postage	Sept. '78	3,000.00
	Aggregate General Election Expenditure for this Candidate - \$			
The Postmaster U. S. Senate Washington, D. C. 20510	Bill Armstrong United States Senate Colorado	Postage	Sept. '78	75.00
	Aggregate General Election Expenditure for this Candidate - \$			
National Direct Mail Services, Inc. 2233 Wisconsin Ave., N. W. Suite #400 Washington, D. C. 20007	David Durenberger United States Senate Minnesota	Postage	Sept. '78	7,140.00
	Aggregate General Election Expenditure for this Candidate - \$			
The Postmaster United States Senate Washington, D. C. 20510	Thad Cochran United States Senate Mississippi	Postage	Sept. '78	127.50
	Aggregate General Election Expenditure for this Candidate - \$			

SUBTOTAL of expenditures this page (optional) MEMO SUBTOTAL \$10,647.50

TOTAL this period (last page this number only) \$

7 2 9 3 1 5 2 4 9 7

Commission  
N.W.  
D.C. 20463

ITEMIZED COORDINATED EXPENDITURES MADE BY  
POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S)  
ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE

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

(Supporting Line 24, FEC Form 3)

Page 2 of 3

For Line 24, FEC Form 3

(To be used only by Political Committees in the General Election)

Name of Political Committee in Full

National Republican Senatorial Committee-Expenditures

Has your Committee been designated to make coordinated expenditures by a political party committee?  YES  NO

If YES, name the designating committee: Republican National and/or Respective State Committees

Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Automated Business Mail 5515 Livingston Road, S. E. Washington, D. C. 20021	David Durenberger United States Senate Minnesota	Typing services <i>2/1-6</i>	Sept. '78	\$ 128.25
	Aggregate General Election Expenditure for this Candidate - \$			
Dorothy Jordan Associates Route 114 East Sebago, Maine	Bill Cohen United States Senate Maine	Housing <i>CONFIDENTIAL</i>	9-1-78	1,500.00
	Aggregate General Election Expenditure for this Candidate - \$			
Ronald Roberts 8205 Blome Road Cincinnati, Ohio 45243	Bob Griffin United States Senate Michigan	Political consulting & expenses <i>2/1-6</i>	Sept. '78	798.55
	Aggregate General Election Expenditure for this Candidate - \$			
Ronald Roberts 8205 Blome Road Cincinnati, Ohio 45243	Charles Percy United States Senate Illinois	Political consulting & expenses <i>2/1-6</i>	Sept. '78	519.58
	Aggregate General Election Expenditure for this Candidate - \$			
Ronald Roberts 8205 Blome Road Cincinnati, Ohio 45243	John Tower United States Senate Texas	Political Consulting & expenses <i>2/1-6</i> <i>CONFIDENTIAL</i>	Sept. '78	1,363.58
	Aggregate General Election Expenditure for this Candidate - \$			
SUBTOTAL of expenditures (this page optional) . . . . .			MEMO SUBTOTAL . . .	\$4,309.96
TOTAL this period (last page this line number only) . . . . .				\$

7 2 7 9 1 1 5 2 1 9 3 0 9

shown on Line 20(a) as expenditures  
**ITEMIZED COORDINATED EXPENDITURES MADE BY  
 POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S)  
 ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE**  
 (2 U.S.C. 441a(d))  
 (Supporting Line 24, FEC Form 3)

Page 3 of 3

For Line 24, FEC Form 3

(To be used only by Political Committees in the General Election)

Name of Political Committee in Full

**National Republican Senatorial Committee-Expenditures**

Has your Committee been designated to make coordinated expenditures by a political party committee?  YES  NO

If YES, name the designating committee: **Republican National and/or Respective State Committees**

Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Communications Corporation of America #1 Direct Marketing Plaza Boston, Virginia 22713	Thad Cochran United States Senate Mississippi	Postage <i>2/25</i>	Sept. '78	\$ 8,929.80
	Aggregate General Election Expenditure for this Candidate -- \$			
Rodney A. Smith 4836 South 28th Street Arlington, Virginia 22206	Nancy Kassebaum United States Senate Kansas	Finance Consulting and expenses <i>2/25</i>	Aug. '78	562.12
	Aggregate General Election Expenditure for this Candidate -- \$			
Rodney A. Smith 4836 South 28th Street Arlington, Virginia 22206	John Warner United States Senate Virginia	Finance Consulting & expenses <i>2/25</i>	Sept. '78	568.00
	Aggregate General Election Expenditure for this Candidate -- \$			
Rodney A. Smith 4836 South 28th Street Arlington, Virginia 22206	Rudy Boschwitz United States Senate Minnesota	Finance Consulting & expenses <i>2/25</i>	Aug. '78	568.67
	Aggregate General Election Expenditure for this Candidate -- \$			
	Aggregate General Election Expenditure for this Candidate -- \$			
<b>SUBTOTAL</b> of expenditures this page (optional) . . . . .			<b>MEMO. SUBTOTAL</b> . . . . .	<b>\$ 10,628.59</b>
<b>TOTAL</b> this period (last page this line number only) . . . . .			<b>MEMO. TOTAL</b> . . . . .	<b>\$ 25,586.05</b>

7 2709 100-1 1522 1489 791 0





# National Republican Senatorial Committee

RECEIVED  
FEDERAL ELECTION  
COMMISSION

'79 MAR 15 PM 12:16

Senator Bob Packwood  
Chairman, Oregon

**MEMBERS**

- Sen. Howard H. Baker, Jr., Tenn.
- Sen. John H. Chafee, R. I.
- Sen. Barry Goldwater, Ariz.
- Sen. Orrin G. Hatch, Utah
- Sen. S. I. Hayakawa, Calif.
- Sen. H. John Heinz III, Penn.
- Sen. Charles McC. Mathias, Jr., Md.
- Sen. William V. Roth, Jr., Del.
- Sen. Harrison Schmidt, N. M.
- Sen. Richard S. Schweiker, Penn.
- Sen. Robert T. Stafford, Vermont
- Sen. Milton R. Young, N. Dak.

March 13, 1979

Rodney A. Smith  
Treasurer

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

Dear Mr. Greevy:

In response to your letter dated January 29, 1979, concerning the October 20 Monthly Report, and the 10 Day Pre General Report, we are enclosing revised schedules of In-Kind Contributions and Allocated Expenditures shown as memo items on Lines 22(c), and 24 respectively, of Page 2, FEC Form 3 for the 10 Day Pre General Report.

If you have any further questions regarding this matter, please feel free to contact me.

Sincerely,

Rodney A. Smith  
Treasurer

RAS:lec  
Enclosures

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JLE B  
 SED  
 January, 1978  
 Federal Election Commission  
 1325 K Street, N.W.  
 Washington, D.C. 20463

October 23

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

Page 1 of 2 for  
 Line Number 22(c)

(Use Separate Schedules for  
 each numbered line)

7 7 0 0 2 1 1 5 0 3 2 2 5

Name of Candidate or Committee in Full			
National Republican Senatorial Committee-Expenditures			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Steven Saunders Nat'l. Republican Senatorial Comm. 227 Massachusetts Ave., N. E. Washington, D. C. 20002	In-Kind Contribution-People for Boschwitz - Minnesota <u>Allocated Salary</u> Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	3/30/78	\$ 15.00
Rodney A. Smith 4836 South 28th Street Arlington, Virginia 22206	In-Kind Contribution- Victory '78 - Maine <u>Finance consulting &amp; expenses</u> Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	8/3/78	267.25
Rodney A. Smith 4836 South 28th Street Arlington, Virginia 22206	In-Kind Contribution-Friends of Roger Jepsen - Iowa <u>Finance consulting &amp; expenses</u> Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	8/3/78	531.47
Rodney A. Smith 4836 South 28th Street Arlington, Virginia 22206	In-Kind Contribution-People for Boschwitz - Minnesota <u>Finance consulting &amp; expenses</u> Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	8/3/78	539.92
Rodney A. Smith 4836 South 28th Street Arlington, Virginia 22206	In-Kind Contribution-Cochran for Senate - Mississippi <u>Finance consulting &amp; expenses</u> Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	8/3/78	286.05
Rodney A. Smith 4836 South 28th Street Arlington, Virginia 22206	In-Kind Contribution-Cochran for Senate - Mississippi <u>Finance Consulting &amp; expenses</u> Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	9/13/78	872.80
Mary Hasenfus Nat'l. Republican Senatorial Comm. 227 Massachusetts Ave., N. E. Washington, D. C. 20002	In-Kind Contribution-Brooke Committee-Massachusetts - Re- <u>imbursed Travel &amp; lodging expenses</u> Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	9/28/78	212.50
John Mooring Nat'l. Republican Senatorial Comm. 227 Massachusetts Ave., N. E. Washington, D. C. 20002	In-Kind Contribution to Richardson for Congress-Utah <u>Videotaping</u> Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	Sept. '78	25.00
SUBTOTAL of expenditures this page (optional) . . . . .		MEMO SUBTOTAL . . . . .	\$ 2,749.99
TOTAL this period (last page this line number only) . . . . .			\$

JLE B  
 SED  
 January, 1978  
 Federal Election Commission  
 325 K Street, N.W.  
 Washington, D.C. 20463

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

Page 2 of 2 for  
 Line Number 22(c)  
 (Use Separate Schedules for  
 each numbered line)

7 2700 0001 5221 550 332 6

Name of Candidate or Committee in Full			
National Republican Senatorial Committee-Expenditures			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
John Mooring Nat'l. Republican Senatorial Comm. 227 Massachusetts Ave., N. E. Washington, D. C. 20002	In-Kind Contribution-Simpson for Senate - Wyoming Videotaping Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	Sept. '78	\$ 25.00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Communications Televideo Ltd. 918 Sligo Avenue Silver Spring, Maryland 20910	In-Kind Contribution-Simpson for Senate - Wyoming Videotape Cassette Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	Sept. '78	23.00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
SUBTOTAL of expenditures this page (optional)		MEMO SUBTOTAL	\$ 48.00
TOTAL this period (last page this line number only)		MEMO TOTAL	\$ 2,797.99



1978  
 Election Commission  
 5 K Street, N.W.  
 Washington, D.C. 20463

shown on Line 20(a) as expenditures  
**ITEMIZED COORDINATED EXPENDITURES MADE BY  
 POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S)  
 ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE**  
 (2 U.S.C. 441a(d))  
 (Supporting Line 24, FEC Form 3)

Page 1 of 1  
 For Line 24, FEC Form 3

(To be used only by Political Committees in the General Election)

Name of Political Committee in Full

National Republican Senatorial Committee-Expenditures

Has your Committee been designated to make coordinated expenditures by a political party committee?  YES  NO  
 If YES, name the designating committee: Republican National and/or Respective State Committees

Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Rodney A. Smith 4836 South 28th Street Arlington, Virginia 22206	Dick Obenshain United States Senate Virginia	Financial consulting and expenses	8/3/78	\$ 282.00
Aggregate General Election Expenditure for this Candidate -- \$				
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Aggregate General Election Expenditure for this Candidate -- \$				
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Aggregate General Election Expenditure for this Candidate -- \$				
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Aggregate General Election Expenditure for this Candidate -- \$				
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Aggregate General Election Expenditure for this Candidate -- \$				

SUBTOTAL of expenditures this page (optional) \$  
 TOTAL this period (last page this line number only) MEMO TOTAL \$ 282.00

7 7 7 9 9 3 1 1 5 2 2 1 5 3 0 1 4 2 7



# National Republican Senatorial Commission

RECEIVED  
FEDERAL ELECTION  
COMMISSION

'79 MAR 15 PM 12:16

Senator Bob Packwood  
Chairman, Oregon

MEMBERS

- Sen. Howard H. Baker, Jr., Tenn.
- Sen. John H. Chafee, R. I.
- Sen. Barry Goldwater, Ariz.
- Sen. Orrin G. Hatch, Utah
- Sen. S. I. Hayakawa, Calif.
- Sen. H. John Heinz III, Penn.
- Sen. Charles McC. Mathias, Jr., Md.
- Sen. William V. Roth, Jr., Del.
- Sen. Harrison Schmitt, N. M.
- Sen. Richard S. Schweiker, Penn.
- Sen. Robert T. Stafford, Vermont
- Sen. Milton R. Young, N. Dak.

March 12, 1979

Rodney A. Smith  
Treasurer

Mr. David Greevy  
Federal Election Commission  
1325 K Street, Northwest  
Washington, D. C. 20463

Dear Mr. Greevy:

In response to your letter dated January 29, 1979, concerning the October 20 Monthly Report, and the 10 Day Pre General Report, we are enclosing a revised schedule of In-kind Contributions shown as a Memo item on Line 22(c), Page 2 FEC Form 3, for the 30 Day Post General Report.

If you have any further questions concerning this matter feel free to contact me.

Sincerely,

Rodney A. Smith  
Treasurer

RAS:lec

Enclosures

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**ITEMIZED EXPENDITURES**

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

(Use Separate Schedules for each numbered line)

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

Name of Candidate or Committee in Full

National Republican Senatorial Committee-Expenditures

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Internal allocation for video equipment used by the campaign but owned by the National Republican Senatorial Committee	In-kind Contribution - Martin for Senate Campaign <u>Alabama</u> Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	10/26/78	\$ 300.00
United Airlines Dept. 745711 P. O. Box 36022M Pittsburgh, Pennsylvania 15250	In-kind Contribution Durenberger for Senate <u>Minnesota - Air Travel</u> Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	11/10/78	206.00
United Airlines Dept. 745711 P. O. Box 36022M Pittsburgh, Pennsylvania 15250	In-Kind Contribution - Helms for Senate - North Carolina <u>Air Travel</u> Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	11/10/78	140.00
United Airlines Dept. 745711 P. O. Box 36022M Pittsburgh, Pennsylvania 15250	In-Kind Contribution-Brooke for Senate-Massachusetts <u>Air Travel</u> Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	11/10/78	120.00
SUBTOTAL of expenditures this page (optional)		MEMO SUBTOTAL	\$ 794.00
TOTAL this period (last page this line number only)			\$

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November 27, 1978

**MEMORIZED EXPENDITURES**

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

Page 2 of 2 for  
Line Number 22(c)

(Use Separate Schedules for  
each numbered line)

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

Name of Candidate or Committee in Full

National Republican Senatorial Committee-Expenditures

Full Name, Mailing Address and ZIP Code  
These are Memo items only and are also shown on Line 24 as expenditures, and should be deducted from Line 24 expenditures in determining total coordinated expenditures for these candidates:

Particulars of Expenditure  
Expenditure for:  
 Primary  General  Other

Date (month, day, year) Amount of each expenditure this period

Full Name, Mailing Address and ZIP Code  
Market Opinion Research  
28 West Adams  
Detroit, Michigan 48226

Particulars of Expenditure  
In-Kind Contribution-Kansans  
for Kassebaum - Kansas  
Polling Survey  
Expenditure for:  
 Primary  General  Other

Date (month, day, year) Amount of each expenditure this period  
10/31/78 \$ 2,000.00

Full Name, Mailing Address and ZIP Code  
Ruth Jones, Ltd.  
123 East 75th Street  
New York, New York 10021

Particulars of Expenditure  
In-Kind Contribution - Bell  
for Senate - New Jersey  
Media Advertising  
Expenditure for:  
 Primary  General  Other

Date (month, day, year) Amount of each expenditure this period  
10/26/78 2,000.00

Full Name, Mailing Address and ZIP Code

Particulars of Expenditure  
Expenditure for:  
 Primary  General  Other

Date (month, day, year) Amount of each expenditure this period

Full Name, Mailing Address and ZIP Code

Particulars of Expenditure  
Expenditure for:  
 Primary  General  Other

Date (month, day, year) Amount of each expenditure this period

Full Name, Mailing Address and ZIP Code

Particulars of Expenditure  
Expenditure for:  
 Primary  General  Other

Date (month, day, year) Amount of each expenditure this period

Full Name, Mailing Address and ZIP Code

Particulars of Expenditure  
Expenditure for:  
 Primary  General  Other

Date (month, day, year) Amount of each expenditure this period

Full Name, Mailing Address and ZIP Code

Particulars of Expenditure  
Expenditure for:  
 Primary  General  Other

Date (month, day, year) Amount of each expenditure this period

SUBTOTAL of expenditures this page (optional) . . . . . MEMO SUBTOTAL . . . . . \$ 4,000.00

TOTAL this period (last page this line number only) . . . . . MEMO TOTAL . . . . . \$ 4,794.00

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WASH DC 200  
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WASHINGTON, DC 20002  
MAR 15  
PM  
1979

227 MASSACHUSETTS AVENUE, N.E.  
Republican-Senatorial Committee

Mr. David Greevy  
Federal Election Commission  
1325 K Street, Northwest  
Washington, D. C. 20463

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
MAR 15 PM 12:16 '79



FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO: CHARLES STEELE  
FROM: MARJORIE W. EMMONS *MWE*  
DATE: MARCH 22, 1979  
SUBJECT: OBJECTION - MUR 820 - General Counsel's  
Report dated 3-16-79; Received  
in OCS 3-19-79, 11:33

The above-named document was circulated on a 48  
hour vote basis at 12:00, March 20, 1979.

Commissioner Friedersdorf submitted an objection  
at 4:15, March 21, 1979, thereby placing MUR 820 on the  
Executive Session Agenda for March 29, 1979.

Commissioner Thomson has submitted an objection  
at 8:50, this date, requesting discussion of the matter.

79010152509

March 19, 1979

MEMORANDUM TO: Marge Emmons  
FROM: Elissa T. Garr  
SUBJECT: MUR 820

Please have the attached General Counsel's Report  
on MUR 820 distributed to the Commission on a 48 hour  
tally basis.

Thank you.

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RECEIVED  
OFFICE OF THE  
SECRETARY

BEFORE THE FEDERAL ELECTION COMMISSION

MAR 19 11:33

In the Matter of )  
 ) MUR 820 (78)  
National Republican )  
Senatorial Committee )

GENERAL COUNSEL'S REPORT

In the Commission's first consideration of this matter, it found reason to believe that the National Republican Senatorial Committee (NRSC) may have violated 2 U.S.C. § 441a(d) by making expenditures in connection with the Senatorial Campaign of James Martin of Alabama in excess of the § 441a(d) limitations published by the Commission. The Commission's published calculations for party spending limits for Senatorial contests limit the national and state committees of the Republican Party to spending no more than \$62,506.94 each on behalf of a Republican candidate for Senate in the state of Alabama. If the National Republican Senatorial Committee acted as the authorized agent of both the National Republican Committee and the Alabama Republican Party, its total spending limit on behalf of Candidate Martin's Senatorial campaign was \$125,013.88. NRSC reported a total of \$196,355.85 in § 441a(d) expenditures on behalf of the Martin campaign.

In response to questions submitted by the Office of General Counsel, NRSC furnished:

79040152511



- 1) Letters from the Republican National Committee authorizing NRSC to make § 441a(d) expenditures in connection with the Martin campaign -
  - (A) Letter dated 9/5/78 - \$10,000.
  - (B) Letter undated - \$52,000.
  - (C) Letter undated - \$60,000.
  - (D) Letter undated - \$ 1,000.
  
- 2) Agreements with the Alabama Republican Executive Committee authorizing NRSC to make § 441a (d) expenditures in connection with the Martin campaign -
  - (A) Agreement dated 8/22/78 - \$60,000.
  - (B) Agreement undated - \$62,000.
  
- 3) Affidavit of Rodney A. Smith, Treasurer, NRSC, in which Mr. Smith states that he supervised and directed the expenditure of § 441a(d) funds in connection with the Martin campaign as authorized by the Republican National Committee and by the Alabama Republican Executive Committee. Mr. Smith further stated that such expenditures were made "properly and in accordance with Commission Advisory Opinion 1978-19."

As stated, NRSC reports disclose a total of \$196,355.85 in § 441a(d) expenditures in connection with the Martin campaign. The affidavit of Rodney A. Smith and additional enclosed materials allocate \$73,370.55 to the Martin Campaign for the Sparkman Senate Seat (S<sub>1</sub>) and \$122,985.30 to the Martin Campaign for the Allen Senate Seat (S<sub>2</sub>). Mr. Martin was a candidate for the Sparkman Seat until October 2, 1978, when he announced his candidacy for the Allen Seat. NRSC purports to apply AO 78-19, the "Fraser AO," in its application of separate § 441a(d) expenditure limits to the two Martin races. Thus, NRSC contends that it could spend a maximum of \$122,000 in connection with S<sub>1</sub>, as authorized by the Republican National

79040152512

Committee and the Alabama Republican Executive Committee, and \$123,000 in connection with S<sub>2</sub>, as authorized.

#### LEGAL ANALYSIS

The Commission's Advisory Opinion 78-19 was in response to a request made by the Fraser Senate Committee concerning the application of FECA to transfers between principal campaign committees for Candidate Fraser in his campaign for two separate Senate races. The Commission noted that

[t]he Act specifically permits, and exempts from contribution limits, the transfer of funds from the principal campaign committee of a candidate seeking one Federal office to the principal campaign committee of the same candidate who seeks another Federal office. 2 U.S.C. § 441a(a)(5)(C).

The Advisory Opinion then concluded that FECA's disclosure threshold and contribution limitations would apply to any contributions transferred by one such principal campaign committee to the other.

Advisory Opinions rendered by the Commission apply a general rule of law to a specific factual situation. 2 U.S.C. § 437f(a). And any advisory opinion rendered by the Commission may be relied upon by

(a) any person involved in the specific transaction or activity with respect to which such advisory opinion is rendered; and (b) any person involved in any specific transaction or activity which is indistinguishable in all its material aspects from the transaction or activity...

2 U.S.C. § 437f(b)(2). See also 11 C.F.R. § 112.5.

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Thus, it would appear that the Martin principal campaign committee for S<sub>1</sub> could properly rely on AO 78-19 in its transfer of funds to the Martin principal campaign committee for S<sub>2</sub>, that being "indistinguishable in all its material aspects" from the activity in AO 78-19. However, NRSC's expenditure of § 441a(d) funds in connection with Martin's S<sub>1</sub> and S<sub>2</sub> campaigns would seem to be materially different from transfers between two principal campaign committees.

NRSC made expenditures in connection with the Martin Senate campaigns pursuant to 2 U.S.C. § 441a(d) which imposes limitations on expenditures "in connection with the general election campaign of a candidate for Federal office." (Emphasis added). Therefore, the § 441a(d) limitations apply to the "general election campaign of a candidate" and § 441a(d) contains no exception, similar to that contained in § 441(a)(5)(C) set out above, for expenditures in connection with one candidate's campaign for more than one Federal office.

Therefore, the Office of General Counsel recommends that the Commission find reasonable cause to believe that the National Republican Senatorial Committee (NRSC) may have violated 2 U.S.C. § 441a(d) by making expenditures in connection with the Senatorial campaign of James Martin of Alabama in excess of the limitations of that provision of the Act, and proceed to conciliation on this matter.

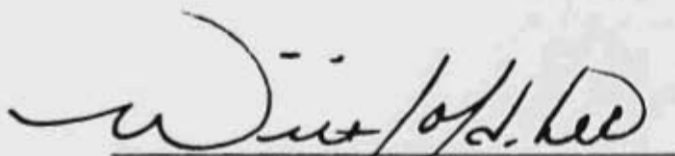
7 9 0 1 0 1 5 2 5 1 4

RECOMMENDATIONS

1. Find reasonable cause to believe that the National Republican Senatorial Committee (NRSC) may have violated 2 U.S.C. § 441a(d) by making expenditures in the amount of \$196,355.85 in connection with the Senatorial campaign of James Martin of Alabama when § 441a(d) limited such expenditures to \$125,013.88.

2. Approve and send the attached conciliation agreement and letter.

3/16/79  
Date

  
William C. Oldaker  
General Counsel

Attachments

1. NRSC Response
2. Conciliation Agreement
3. Letter to Respondent

79040152515



6007  
9061

LAW OFFICES

JENKINS, NYSTROM & STERLACCI, P.C.

MERLE R. JENKINS  
DENNIS H. NYSTROM  
MICHAEL A. STERLACCI  
CARL F. SCHIER  
JOSEPH E. JANNETTA  
JAMES F. SCHOENER  
STEPHEN J. HITCHCOCK  
CHRIS M. PARFITT  
GARY J. NYSTROM  
RONALD A. DENEWETH  
TIMOTHY J. MULLINS

2033 M STREET, N.W.  
WASHINGTON, D. C. 20036

(202) 293-2505

OF COUNSEL  
JOHN B. CONLAN  
EDWARD A. RYDER

MICHIGAN OFFICE  
15999 WEST TWELVE MILE ROAD  
SOUTHFIELD, MICHIGAN 48076  
(313) 559-2828

January 10, 1979

Kathleen Imig Perkins, Esq.  
Office of General Counsel  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

500287

Re: M U R 820

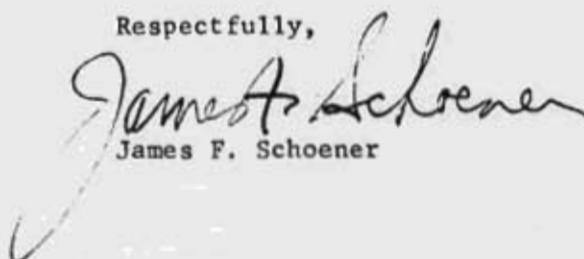
Dear Ms. Perkins:

Enclosed you will find the affidavit of Mr. Rodney A. Smith, treasurer of the National Republican Senatorial Committee concerning expenditures and contributions to the two Martin for Senate Committees. As is apparent from the last part of the affidavit, Mr. Martin resigned from his candidacy for the Senate seat of retiring Senator John Sparkman (Class 2, United States Senate) in October 1978, and was thereafter nominated to run for the seat left vacant by the untimely death of Senator James Allen of Alabama (Class 3, United States Senate). A similar situation had previously occurred in Minnesota and Advisory Opinion 1978-19 to Congressman Fraser was studiously followed to give direction for such a change in candidacy.

The affidavit should show our compliance with the requirements of that Advisory Opinion and I attach hereto copies of assignment and allocation agreements of the National and State Party committees authorizing our acting as their agent in each of these campaign committees.

I will be glad to furnish any further information or documentation needed to indicate our compliance in this matter, and ask that before any further action is taken that we be given an opportunity for a conference or answer further questions in writing.

Respectfully,

  
James F. Schoener

JFS:cel

Enclosures

P.S. I also enclose a copy of the review by Stan Huckaby, the C.P.A. who checked the items mentioned in the Rodney Smith affidavit.

79040152516



Republican  
National  
Committee

*Revised/Perkins*

September 5, 1978

The Honorable Bob Packwood, Chairman  
National Republican Senatorial Committee  
227 Massachusetts Avenue, NE  
Washington, D. C. 20002

Dear Bob:

By this letter the Republican National Committee authorizes the National Republican Senatorial Committee to serve as the agent of the Republican National Committee, for the purpose of making expenditures pursuant to 2 USC S441a (d) (3). Your Committee is authorized to make these expenditures, on behalf of the Republican National Committee, in connection with the general election campaign of James Martin of Alabama.

Under S441a (d) (3) you may spend, on the Republican National Committee's behalf, up to \$10,000 for Mr. Martin.

Best personal regards.

Very truly yours,

*Bill Brock*  
BILL BROCK

BB/bnp

- cc: Bob Moore
- Ben Cotten
- Charlie Black
- Jacque Nystrom
- Matt Wirgau
- Jay Banning

790401517



Republican  
National  
Committee

Bill Brock  
Chairman

The Honorable Bob Packwood, Chairman  
National Republican Senatorial Committee  
227 Massachusetts Avenue, NE  
Washington, D. C. 20002

Dear Bob:

By this letter the Republican National Committee authorizes the National Republican Senatorial Committee to serve as the agent of the Republican National Committee, for the purpose of making expenditures pursuant to 2 USC S441a(d)(3). Your Committee is authorized to make these expenditures, on behalf of the Republican National Committee, in connection with the general election campaign of Senate Seat 1, Alabama and is in addition to our letter of Sept. 5, 1978, in the amount of \$10,000.

Under S441a(d)(3) you may spend, on the Republican National Committee's behalf, an additional \$52,000 for Mr. Martin, bringing the cumulative total to \$62,000.

Best personal regards.

Very truly yours,

*Bill Brock*  
BILL BROCK

BB/bnp

cc: Bob Moore  
Ben Cotten  
Charlie Black  
Jacquie Nystrom  
Jay Banning

77010152518



Republican  
National  
Committee

Bill Brock  
Chairman

The Honorable Bob Packwood, Chairman  
National Republican Senatorial Committee  
227 Massachusetts Avenue, NE  
Washington, D. C. 20002

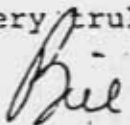
Dear Bob:

By this letter the Republican National Committee authorizes the National Republican Senatorial Committee to serve as the agent of the Republican National Committee, for the purpose of making expenditures pursuant to 2 USC S441a(d)(3). Your Committee is authorized to make these expenditures, on behalf of general election campaign of Senate Seat #2.

Under S441a(d)(3) you may spend, on the Republican National Committee's behalf, up to \$60,000 for Mr. James Martin, of Alabama .

Best personal regards.

Very truly yours,

  
BILL BROCK

BB/bnp

cc: Bob Moore  
Ben Cotten  
Charlie Black  
Jacquie Nystrom  
Jay Banning  
Kenny Klinge





Republican  
National  
Committee

Bill Brock  
Chairman

The Honorable Bob Packwood, Chairman  
National Republican Senatorial Committee  
227 Massachusetts Avenue, NE  
Washington, D. C. 20002

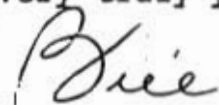
Dear Bob:

By this letter the Republican National Committee authorizes the National Republican Senatorial Committee to serve as the agent of the Republican National Committee, for the purpose of making expenditures pursuant to 2 USC S441a(d)(3). Your Committee is authorized to make these expenditures, on behalf of the Republican National Committee, in connection with the general election campaign of Senate Seat #2. and is in addition to our letter in the amount of \$60,000.

Under S441a(d)(3) you may spend, on the Republican National Committee's behalf, an additional \$1,000 for Mr. Allen, bringing the cumulative total to \$61,000.

Best personal regards.

Very truly yours,

  
BILL BROCK

BB/bnp

cc: Bob Moore  
Ben Cotten  
Charlie Black  
Jacquie Nystrom  
Jay Banning  
Kenny Klinge

# Republican National Committee

William D. Harris, State Chairman  
Member for Alabama  
P.O. Box 3315  
Birmingham, Alabama 35205  
(205) 322-5733

## AGREEMENT BETWEEN THE NATIONAL REPUBLICAN SENATORIAL COMMITTEE AND THE ALABAMA REPUBLICAN EXECUTIVE COMMITTEE

The National Republican Senatorial Committee, hereinafter known as "Senatorial", agrees with the Alabama Republican Executive Committee, hereinafter known as "State"; as follows:

1. Under the provision of 441 a(d) (3) of Title 2 of the United States Code, State (and its subordinate committees) may make certain expenditures in connection with the general election campaign of the candidate for the office United States Senator for the State of Alabama.
2. Such amount of allowed expenditures under said provision has been computed tentatively by the Federal Election Commission as the amount of \$62,507.00.
3. That State wishes to designate Senatorial its agent for the purpose of making such expenditures up to the amount of \$60,000.00.
4. State agrees to file an allocation statement concerning the amount not assigned to Senatorial as required by the Federal Election Commission Regulation 110.7(c).
5. State agrees to carry out the provisions of such allocation statement and will promptly advise Senatorial at any time that State and its subordinate committees reach 80% of the amount retained by State and a review of this agreement will occur at such time.
6. Senatorial agrees to make such expenditures in behalf of candidate, or if it is any manner unable to make such expenditures, to promptly release and cancel said agency and reassign such allocated amount to State.

This agreement signed the date opposite the respective parties' name to be effective when signed by both parties.

Dated Aug 22, 1978 1978 at  
Washington, D. C.

National Republican Senatorial Committee

By Rodney A. Smith

Title Treasurer

Alabama Republican Executive Committee

By William D. Harris

William D. Harris

Title Chairman

Dated 10 August 1978 1978 at  
Birmingham, Alabama.



# Republican National Committee

William D. Harris, State Chairman  
Member for Alabama  
P.O. Box 3315  
Birmingham, Alabama 35205  
(205) 322-5733

*Original*

## AGREEMENT BETWEEN THE NATIONAL REPUBLICAN SENATORIAL COMMITTEE AND THE ALABAMA REPUBLICAN EXECUTIVE COMMITTEE

The National Republican Senatorial Committee, hereinafter known as "Senatorial", agrees with the Alabama Republican Executive Committee, hereinafter known as "State"; as follows:

1. Under the provision of 441 a(d) (3) of Title 2 of the United States Code, State (and its subordinate committees) may make certain expenditures in connection with the special general election campaign of the candidate for the office United States Senator for the State of Alabama unexpired term Place #2.
2. Such amount of allowed expenditures under said provision has been computed tentatively by the Federal Election Commission as the amount of \$62,507.00.
3. That State wishes to designate Senatorial its agent for the purpose of making such expenditures up to the amount of \$62,000.00
4. State agrees to file an allocation statement concerning the amount not assigned to Senatorial as required by the Federal Election Commission Regulation 110.7(c).
5. State agrees to carry out the provisions of such allocation statement and will promptly advise Senatorial at any time that State and its subordinate committees reach 80% of the amount retained by State and a review of this agreement will occur at such time.
6. Senatorial agrees to make such expenditures in behalf of candidate, or if its in any manner unable to make such expenditures, to promptly release and cancel said agency and reassign such allocated amount to State.

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This agreement signed the date opposite the respective parties' name to be effective when signed by both parties.

Dated \_\_\_\_\_ 1978 at  
Washington, D. C.

National Republican Senatorial Committee  
By *R. L. Smith*  
Title *Treasurer*

Dated \_\_\_\_\_ 1978 at  
Birmingham, Alabama

Alabama Republican Executive Committee  
By *William D. Harris*  
Title *Chairman*

Political Financial Services

901 L'Enfant Plaza Center, S.W.

Washington, D.C. 20024

(202) 554-2206

Stan Huckaby

Res: (202) 554-4679

Federal Campaign  
Financial Consulting Services

October 17, 1978

Rod Smith  
National Republican Senatorial Committee  
227 Massachusetts Avenue, NE  
Washington, DC 20002

Dear Rod,

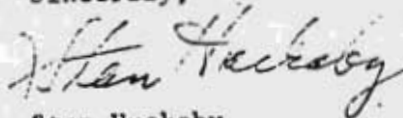
Pursuant to our conversation of last week, I am submitting the following figures to the National Republican Senatorial Committee concerning your limitations on the Jim Martin For Senate Committee.

As you know, Mr. Martin has changed candidacy for election to the United States Senate, and, therefore, under the law, is entering a new election. In accordance with Advisory Opinion 1978-19, we have made an allocation of the "coordinated expenditures" made by the National Republican Senatorial Committee between the first senate race and the second senate race. Of the \$100,000.00 in coordinated expenditures that you have made, \$70,170.55 has been allocated to the first senate campaign, and \$28,458.63 has been allocated to the second campaign. The remaining balance of \$1,370.82 is presently being refunded to you by the vendor. Using A.O. 1978-19, all of your contributions (\$17,500.00 maximum) made to the first senate campaign are non-allocable to the second campaign. Therefore, that limit will begin again. I understand that you have made subsequent contributions to the second senate campaign, and those amounts should be added to the \$28,458.63 in determining the total amount remaining for coordinated expenditures in the second senate campaign. A detailed explanation for this allocation has been telecopied to you by the Jim Martin for Senate Campaign Committee.

All allocations have been made based on the exact amounts of invoices given to us by vendors. Should any of these amounts have a slight variation, we will immediately notify you as to the effects they have on your limitation.

Please feel free to contact me if you have any further questions concerning this matter.

Sincerely,



Stan Huckaby

SH:tmb

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UNITED STATES OF AMERICA  
Before the FEDERAL ELECTION COMMISSION

In the matter of  
NATIONAL REPUBLICAN SENATORIAL COMMITTEE

M.U.R. 820

AFFIDAVIT

City of Washington  
District of Columbia

Rodney A. Smith, being duly sworn deposes and says:

I

That he is the duly appointed treasurer of the National  
Republican Senatorial Committee of 227 Massachusetts Avenue, N.E.,  
Washington, D.C.

II

That as such treasurer he supervised and directed the making of  
contributions as allowed by law to Republican candidates for the office  
of United States Senate in the year 1978.

III

That in such capacity donations of cash (or in-kind) were made to  
James Martin for Senate (Sparkman seat) from July 11 through August 17th,  
1978 in the amount of \$16,493.27 as is shown in our internal records,  
a copy of which is attached as Exhibit A.

79040152524



IV

That in such capacity donations of cash in the amount of \$17,000 were made to James Martin for Senate (Allen seat) on October 6th and an in-kind contribution of use of video equipment of \$300.00 made on/about October 26th as is shown by our internal records, a copy of which is attached as Exhibit B.

V

That he is informed and believes that such cash expenditures are allowed under the provisions of 2 U.S.C. Section 441a(h).

VI

That in such capacity he supervised and directed the expenditure of funds in behalf of James Martin for Senate (Sparkman seat), as authorized by 2 U.S.C. 441a(d) and as assigned to the National Republican Senatorial Committee by Republican National Committee. Said expenditures in behalf of James Martin for Senate (Sparkman seat) are shown in the attached Exhibit C.

VII

That in such capacity he supervised and directed the expenditure of funds in behalf of James Martin for Senate (Allen seat) as authorized by 2 U.S.C. 441a(d) and as assigned to the National Republican Senatorial Committee by the Republican National Committee. Said expenditures in behalf of James Martin for Senate (Allen seat) are shown in the attached Exhibit D. As shown in said Exhibits C and D, a credit for funds or materials transferred from James Martin for Senate (Sparkman seat) to James Martin for Senate (Allen seat) in the amount of \$28,458.63 was made on October 2, 1978.

79010152525

VIII

That he is informed and believes that such agency agreements are proper and correct and that the same were in accordance with Commission Regulations # 110.7 and Advisory Opinion 1976-108.

IX

That he supervised and directed the expenditures for James Martin for Senate (Sparkman seat) and James Martin for Senate (Allen seat) as were assigned by allocation agreements from the Alabama (State) Republican Executive Committee, such expenditures being shown on the aforesaid Exhibits C and D.

X

That he is informed and believes that all such transactions were made properly and in accordance with Commission Advisory Opinion 1978-19 "Contributions to Two Campaigns by One Candidate" made in connection with the Fraser for Senate Campaigns, and that the Martin Campaigns are indistinguishable in all material aspects from said Fraser situation.

XI

That in order to make sure that all proper credits were made for cash or credits transferred from the Martin Committee (Sparkman seat) to the Martin Committee (Allen seat), the National Republican Senatorial Committee required a certified public accountant to make

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an on-site review of credits of cash and in-kind contributions transferred from the first committee to the second.

XII

Further deponent saith not.

*Rodney A. Smith*

Rodney A. Smith  
Treasurer, National Republican  
Senatorial Committee

Sworn to and subscribed before me a notary public in and for the District of Columbia this 11 day of January 1979.

*Lois M. Lane*

Notary Public  
My commission expires 3-31-83

79040152527

CANDIDATE: TIM MARTIN

DATE		DESCRIPTION	R.S.C CK NO	RNC-RSC, Sect. 441 Expanded	CONTRIBUTION BALANCE
1		LEGAL LIMIT			17,500.
2	7 11		TRUST ACCOUNT	x 5,000.- ✓	12,500.
4	7 25	Holder, Kennedy, Dye + Bell	TRUST ACCOUNT	x 2,500.- ✓	10,000.
7	6 19	Memo / Tom Bell		x 5,197.- x	9,803.
9	8 4	Contributions	TRUST ACCT	x 8,000.- ✓	1,803.
11	8 17	Contributions	TRUST	x 5,796.27 ✓	1,006.73

EXHIBIT A

Spent by  
Bell  
Dye



DATE	DESCRIPTION	RSC CK. No.	RNC-RSC SECT. 441 CONTRIBUTION Expended	BALANCE	
	Legal Limit			17,500	1
					2
				\$	3
10 6	Cash Contribution	Trans	\$17000	500	4
					5
10 26	Use of Video Eq. used by Com		350	200	6
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EXHIBIT B

770151529

Miss Star



CANDIDATE: JIM MARTIN

DATE	DESCRIPTION	RSC	SECTION 441 EXPENDITURES		
		CK No.	NATIONAL Expended	STATE Expended	BALANCE
	LEGAL LIMIT		62504	62504	62504
9 1	Daniel & Assoc Trust Fee			*\$5000	
9 14	Daniel & Assoc Trust Fee			*\$5000	
9 29	Chris Ford Trust		\$ 200		16000
10 2	Held for Kinney Trust		\$5000		
7 19	John H. Friendly		\$30000		
10 5	Credited fr. Daniel & Assoc		(13705.2)		38629.45

EXHIBIT C

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A. The National Republican Senatorial Committee was authorized to make coordinated expenditures in connection with the general election campaign of James Martin for Senate in the state of Alabama by both the Republican National Committee and the Alabama Republican Executive Committee.

B. Said expenditures were limited by calculations published by the Commission pursuant to 2 U.S.C. § 441a(d) to an amount not exceeding \$125,013.88, \$62,506.94 for each of the national and state Republican Party committees.

C. The National Republican Senatorial Committee spent a total of \$196,355.85 in connection with James Martin's Senatorial campaign, and reported said expenditures to the Commission as coordinated § 441a(d) expenditures.

D. NRSC exceeded the published limits for coordinated party expenditures in connection with James Martin's Senatorial campaign in Alabama by \$71,341.97, a violation of FECA's 2 U.S.C. § 441a(d).

E. NRSC erroneously relied upon AO 1978-19 in making said expenditures since the factual situation of coordinated party expenditures is materially different from transfers between principal campaign committees of the same candidate for two Federal offices.

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Wherefore, respondent National Republican Senatorial Committee agrees:

- I. That Commission Advisory Opinions may not be relied upon in factual situations materially different from that present in the Advisory Opinion Request;
- II. That Respondent NRSC will pay a civil penalty in the amount of \$35,000 pursuant to 2 U.S.C. § 437g(a)(6)(B).
- III. That Respondent will not undertake any activity which is in violation of the Federal Election Campaign Act, 2 U.S.C. § 431 et seq.

GENERAL CONDITIONS

- I. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matter 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.
- 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.

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III. It is agreed that respondent, National Republican Senatorial Committee, shall have 30 days from the date of this agreement to implement and comply with the requirements contained herein, or to so notify the Commission.

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\_\_\_\_\_  
Date

\_\_\_\_\_  
William C. Oldaker  
General Counsel  
Federal Election Commission

\_\_\_\_\_  
Date

\_\_\_\_\_  
Rodney A. Smith  
Treasurer



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

James F. Schoener, Attorney  
Jenkins, Nystrom & Sterlacchi, P.C.  
2033 M Street, N.W.  
Washington, D.C. 20036

Re: MUR 820

Dear Mr. Schoener:

On March , 1979, the Commission determined that there was reasonable cause to believe that the National Republican Senatorial Committee committed a violation of 2 U.S.C. § 441a(d) of the Federal Election Campaign Act of 1971, as amended. Specifically, the Commission found reasonable cause to believe that the NRSC exceeded the Commission's published coordinated party expenditure limitations (§ 441a(d) limitations) in James Martin's Senatorial campaign in Alabama.

The Commission has a duty to attempt to correct such violations for a period of 30 days by informal methods of conference, conciliation and persuasion, and by entering into a conciliation agreement. 2 U.S.C. § 437g(a)(5)(A). If we are unable to reach an agreement during that period, the Commission may, upon a finding of probable cause to believe a violation has occurred, institute civil suit in United States District Court and seek payment of a civil penalty not in excess of \$5,000 or an amount equal to the amount of the alleged violation.

We enclose a conciliation agreement that this office is prepared to recommend to the Commission in settlement of this matter. If you agree with the provisions of

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the enclosed conciliation agreement, please sign and return it [along with the civil penalty] to the Commission within ten days. I will then recommend that the Commission approve the agreement.

If you have any questions or suggestions for changes in the enclosed conciliation agreement, please contact Kathleen Imig Perkins, the attorney assigned to this matter, at (202) 523-4175.

Sincerely,

William C. Oldaker  
General Counsel

Enclosure

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FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO CHARLES STEELE  
FROM: MARJORIE W. EMMONS *by DC*  
DATE: MARCH 1, 1979  
SUBJECT: MUR 820 - Interim Investigative Report  
dated 2-27-79: Received in OCS  
2-27-79, 4:34

The above-named document was circulated on a 24 hour no-objection basis at 3:15, February 28, 1979.

The Commission Secretary's Office has received no objections to the Interim Investigative Report as of 4:15 this date.

79040154538

February 27, 1979

MEMORANDUM TO: Marge Emmons  
FROM: Elissa T. Garr  
SUBJECT: MUR 820

Please have the attached Interim Invest Report  
on MUR 820 distributed to the Commission.

Thank you.

79040152539



RECEIVED  
OFFICE OF THE  
COMMISSION SECRETARY

BEFORE THE FEDERAL ELECTION COMMISSION

79 FEB 27 P 4: 34

In the Matter of )  
 )  
National Republican Senatorial )  
Committee )

MUR 820

INTERIM INVESTIGATIVE REPORT

The review of the National Republican Senatorial Committee ("NRSC") response has been completed and the facts in this matter analyzed. We are currently drafting a General Counsel's Report to be presented to the Commission shortly.

Date: 2/27/79

William C. Oldaker  
William C. Oldaker  
General Counsel

by Garth Johnson

79040152540

REPORTS ANALYSIS REFERRAL UPDATE

\*ORIGIN: OGC

DATE March 1, 1979

ANALYST David Greevy

TO: Office of General Counsel  
ATTENTION: Kathy Perkins

TEAM CHIEF Peggy Sims *Peggy Sims*

THROUGH: STAFF DIRECTOR *OH*

COMPLIANCE REVIEW C. Brown

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS *DAV*

MUR No. 820

DATE OF ORIGINAL REFERRAL 12-13-78

National Republican Senatorial Committee-Expenditures

Attachments

\*\*PURPOSE: INFORMATION

- RFAI, dated 1/29/79 to October 20 Monthly & 10 Day Pre-General Election Reports 1
- Response, dated 2/13/79, to above RFAI 2
- Telecon of 2/28/79 regarding response of 2/13/79 3

Note: Because of the complexity of the information requested and provided, each appropriate paragraph in the RFAI has been lettered. Attachments, corresponding to these letters, have been provided for the several portions of the response, and corresponding letters have been placed appropriately within the body of the telecon.

OUTCOME: (if applicable)

Committee will reanalyze all entries reported on Line 22(c), and will provide amendments as necessary.

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\*Commission unit which initiated original Referral (e.g. AUDIT/RAD/OGC).

\*\*INFORMATION, or RESULTS OF RAD ACTION, as appropriate.



FEDERAL ELECTION COMMISSION

1125 K STREET, N.W.  
WASHINGTON, D.C. 20543

January 29, 1979

Rodney A. Smith, Treasurer  
National Republican Senatorial Committee-Expenditures  
227 Massachusetts Avenue N.E.  
Washington, D.C. 20002

Dear Mr. Smith:

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

October 20 Monthly & 10 Day Pre-General

During review of the Election Reports of Receipts and Expenditures, we noted that you omitted certain information or made apparent mathematical errors in certain entries. Attached is an itemization of the information requested.

While we recognize the difficulties you may have experienced in filling out the reporting forms, we must ask that you supply the Commission with the missing information within fifteen (15) days from the date of this letter. If you have any questions, please do not hesitate to contact David Croovy in our Reports Analysis Division on the toll free number (800)424-9530. Our local number is (202)523-1474.

Sincerely,

*Orlando B. Potter*

Orlando B. Potter  
Staff Director

Attachment  
FEC Form 12

739940153430



REQUEST FOR ADDITIONAL INFORMATION FOR THE October 20 Monthly REPORT OF RECEIPTS AND EXPENDITURES COVERING THE PERIOD 9/1/78 THROUGH 9/30/78 PURSUANT TO THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED.

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

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

- Coverage Dates  omitted or  incorrect
- Signature  omitted or  incorrect
- Summary Page Line(s)  Column(s)  Totals  omitted or  incorrect
- Detailed Summary (Page 2) Line(s)  Column(s)  Totals  omitted or  incorrect
- Schedule Totals  disagree with Detailed Summary (Page 2) or  omitted
- Date(s)  omitted or  inadequate for Schedule(s)  Line(s)
- Full Name(s) Omitted for Schedule(s)  Line(s)
- Mailing Address(es)  omitted or  inadequate for Schedule(s)  Line(s)
- Occupational Descriptions  omitted or  inadequate for Schedule(s)  Line(s)
- Principal Place(s) of Business  omitted or  inadequate for Schedule(s)  Line(s)
- Aggregate Year-to-date Totals  omitted or  inadequate for Schedule(s)  Line(s)
- Nature or Purpose of Expenditure  omitted or  inadequate for Schedule(s)  Line(s)
- Nature or Purpose of Receipt  omitted or  inadequate for Schedule(s)  Line(s)
- Inadequate Description of  proceeds  dates  events  location of Schedule
- Other: Please See Page Two

Your initial submission(s), together with this request for additional information, has been made available for public inspection. The Commission urges you to file the additional submission(s) promptly to the above address. If you have any questions regarding this request, please call the Reports Analysis Division toll free at (800) 424-9520. The local Washington, D.C. telephone numbers are (202) 523-4048 (Senate, Non-Party), 523-4172 (House) or 523-1474 (Party).

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

National Republican Senatorial Committee-Expenditures  
October 20 Monthly-1978

A

Please provide aggregate general election coordinated expenditures for those candidates on whose behalf the committee made coordinated expenditures, as reported within this report, on Schedule F.

B

The committee has reported on Schedule F several contributions made to candidates for federal office. Please be advised that these transfers should be reported on Schedule B, Line 22(b).

C

The committee has reported, on Schedule B, Line 20(a), several operating expenditures the purposes of which mention the names of non-incumbent candidates for Federal office. A summary of these entries is presented below.

Candidate	Page	Amount
Cohen	1 of 23	\$1,500
Cochran	9 of 23	\$127.50
Armstrong	9 of 23	\$75
Shasteen	9 of 23	\$3,000
Durenberger	16 of 23	\$2,090.05
Kassebaum	16 of 23	\$305
Durenberger	16 of 23	\$3,929.80
Durenberger	17 of 23	\$7,140

Please state whether these expenditures constitute in-kind contributions made to the candidates listed or expenditures, made in accordance with 2 U.S.C. 441a(d), made on behalf of the candidates listed. Please amend your report as necessary. If these expenditures do not constitute in-kind contributions made to or expenditures made on behalf of the candidates listed, please further clarify the nature of the expenditures and their relationship to the candidates listed.

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TO: National Republican Senatorial Committee Expenditures

DATE: January 29, 1979

CD0027466

10 Twy Pre-General

REQUEST FOR ADDITIONAL INFORMATION FOR THE Election AND EXPENDITURES COVERING THE PERIOD 10/1/73 THROUGH 10/23/73 PURSUANT TO THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED. REPORT OF RECEIPTS

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

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

- Coverage Dates omitted or incorrect
Signature omitted or incorrect
Summary Page Line(s) Column(s) Totals omitted or incorrect
Detailed Summary (Page 2) Line(s) Column(s) Totals omitted or incorrect
Schedule Totals disagree with Detailed Summary (Page 2) or omitted
Date(s) omitted or inadequate for Schedule(s) Line(s)
Full Name(s) Omitted for Schedule(s) Line(s)
Mailing Address(es) omitted or inadequate for Schedule(s) Line(s)
Occupational Descriptions omitted or inadequate for Schedule(s) Line(s)
Principal Place(s) of Business omitted or inadequate for Schedule(s) Line(s)
Aggregate Year-to-date Totals omitted or inadequate for Schedule(s) Line(s)
Nature or Purpose of Expenditure omitted or inadequate for Schedule(s) Line(s)
Nature or Purpose of Receipt omitted or inadequate for Schedule(s) Line(s)
Inadequate Description of proceeds dates events location of Schedule
Other: Please See Page Two

Your initial submission(s), together with this request for additional information, has been made available for public inspection. The Commission urges you to file the additional submission(s) promptly to the above address. If you have any questions regarding this request, please call the Reports Analysis Division toll free at (800) 424-0530. The local Washington, D.C. telephone numbers are (202) 523-4048 (Senate, Non-Party), 523-4172 (House) or 523-1474 (Party).

Senate filers should file their submission(s) with the Secretary of the Senate, Office of Public Records, 1 - D St. N.E., Washington, D.C. 20510. House filers should file their submission(s) with the Clerk of the House, Office of Records and Registration, 1036 Longworth House Office Building, Washington, D.C. 20515.

National Republican Senatorial Committee-Expenditures  
10 Day Pre-General Election Report-1978

D The committee has reported making in-kind contributions to and expenditures on behalf of the Victory '78 Committee. Please be advised that this committee is the principal campaign committee for William Cohen's campaign for the United States House of Representatives. Please clarify whether these contributions and expenditures were made in connection with William Cohen's campaign for the United States Senate or United States House of Representatives.

E The committee has reported making an in-kind contribution to Richardson for Congress. Please provide the circumstances for the committee's supporting a candidate for the United States House of Representatives.

F The committee has reported on Schedule F a contribution made to a candidate for federal office. Please be advised that this transfer should be reported on Schedule B, Line 22(b).

G The committee has reported, on Schedule B, Line 22(c), several in-kind contributions made to candidates for federal office. In several of these entries, the committee lists the particulars of the expenditures as, "In-kind Contributions." In several other entries, the committee lists the particulars of the expenditures as, "Allocated expenditures." Please state whether all of these entries constitute in-kind contributions to the candidates listed. If any of these expenditures constitute expenditures made in accordance with 2 U.S.C. 441a(d), the report, as well as any other reports in which this discrepancy exists, should be amended to disclose these expenditures on Schedule F, Line 24.

H Please provide aggregate general election coordinated expenditures for those candidates on whose behalf the committee made coordinated expenditures, as reported within this report, on Schedule F.

I The committee has disclosed in this report several debts or obligations owed by the committee which were incurred prior to this reporting period, but were not included in the previous report filed. Please provide the circumstances for this discrepancy.

7 2 0 1 0 1 5 2 5 4 6 4

# National Republican Senatorial Committee

1979 FEB 22 11 45 AM  
HARRIS

Senator Bob Packwood  
Chairman, Oregon

February 13, 1979

### MEMBERS

- Sen. Howard H. Baker, Jr., Tenn.
- Sen. John H. Chafee, R. I.
- Sen. Barry Goldwater, Ariz.
- Sen. Orrin G. Hatch, Utah
- Sen. S. I. Hayakawa, Calif.
- Sen. H. John Heinz III, Penn.
- Sen. Charles McC. Mathias, Jr., Md.
- Sen. William V. Roth, Jr., Del.
- Sen. Harrison Schmitt, N. H.
- Sen. Richard S. Schweiker, Penn.
- Sen. Robert T. Stafford, Vermont
- Sen. Milton R. Young, N. Dak.

Honorable J. Stanley Kimmitt  
Office of Public Records  
119 D St., N.E.  
Washington, D.C. 20510

Dear Mr. Kimmitt:

In compliance with correspondence received from the Federal Election Commission, dated January 29, 1979, I am enclosing information requested.

### October 20, Monthly:

- A Paragraph 1 - See attached Schedule F.
- B Paragraph 2 - See attached Schedule B.
- C Paragraph 3 - See attached Schedule F.

### 10 Day Pre-General:

- D Paragraph 1 - Contributions to the Victory '78 Committee were for William Cohen's campaign for the U.S. Senate (Maine).
- E Paragraph 2 - U.S. Senators Orrin Hatch (R-UT) and Jake Garn (R-UT) used video equipment from the National Republican Senatorial Committee to make a taped endorsement for a congressional candidate. This expense is the fair market value of the service provided from our equipment.
- F Paragraph 3 - See attached Schedule B.
- G Paragraph 4 - Amended Schedule F attached.
- H Paragraph 5 - See attached Schedule F.

7/4/79 10:52:15'47"

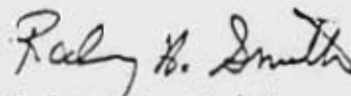
K 323

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Paragraph 6 - Schedule C report of Debts and Obligations. With respect to items questioned under this section, please be advised that the dates listed herein by Avignone Freres (p.3), Automated Correspondence Systems (p.4) Baker's Photo Supply (p.4), Treck Photographic (p.6) and Tri-State Envelope Corporation (p.7) are invoice dates. Each of these invoices came through agents dealt with by the Senatorial Committee, and not directly to the Committee. The Senatorial Committee received these invoices at a later time after they had been verified by our agents.

The statement from the Flower Designer, Inc. (p.6) was erroneously charged to another customer by that company. Only after the problem was corrected did the Senatorial Committee receive this bill.

Sincerely,

  
Rodney A. Smith  
Treasurer

RAS:mkh  
Enclosures  
I.D. #CO02746 .

7/9 7/4 4 4 5 2 5 4 8 3

(To be used only by Political Committees in the General Election)

Name of Political Committee in Full

National Republican Senatorial Committee - Expenditures

Has your Committee been designated to make coordinated expenditures by a political party committee?  YES  NO  
 If YES, name the designating committee: Republican National and/or Respective State Committees

Full Name, Mailing Address and ZIP Code of Each Payer	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Automated Business Mail 5515 Livingston Road, S.E. Washington, D. C. 20021	Citizens for Cochran Mississippi	Typing Services	10/2/78	\$ 1,069 ✓
Aggregate General Election Expenditure for this Candidate - \$				
National Direct Mail Services 733 Bethesda Ave. Suite #530 Bethesda, Maryland 20014	Durenberger for Senate Minnesota	Postage for direct mail services	10/2/78	5,610 ✓
Aggregate General Election Expenditure for this Candidate - \$ 776,789				
holder, Kennedy, Dye & Bell 2020 21st Ave., South Nashville, Tenn. 37212	Martin for U. S. Senate Alabama	Media Advertising	10/2/78	50,000 ✓
Aggregate General Election Expenditure for this Candidate - \$ 50,000				
Automated Business Mail 5515 Livingston Road, S.E. Washington, D. C. 20021	Re-elect Baker Committee Tennessee	Postage	10/2/78	250 ✓
Aggregate General Election Expenditure for this Candidate - \$ 250				
Ruth Jones, Ltd. 113 E. 75th Street New York, New York 10021	Bell for Senate Committee New Jersey	Media Advertising	10/2/78	15,000 ✓
Aggregate General Election Expenditure for this Candidate - \$ 15,000				

SUBTOTAL of expenditures this Dept (optional)

TOTAL this period (list Dept this line number only)



POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S)  
 ON BEHALF OF CANDIDATE FOR FEDERAL OFFICE  
 (P.U.S.C. 441a(d))  
 (Supporting Line 24, FEC Form 3)  
 (To be used only by Political Committees in the General Election)

Name of Political Committee in Full

National Republican Senatorial Committee - Expenditures

Has your Committee been designated to make coordinated expenditures by a political party committee?  YES  NO

If YES, name the designating committee: Republican National and/or Respective State Committees

5  
3  
2  
5  
3  
0  
2  
0  
2  
7

Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Carol Burns c/o Citizens for Percy Suite #2216 8 South Michigan Avenue Chicago, Illinois 60603	Citizens for Percy Illinois	Special Consultant	10/3/78	\$ 500. ✓
Aggregate General Election Expenditure for this Candidate - \$ 35,100.00				
Mr. Ed Pinto 6715 New Hope Drive Springfield, Virginia 22151	Brooke Committee Massachusetts	Reimbursement of Expenses	10/3/78	148. ✓
Aggregate General Election Expenditure for this Candidate - \$ 142,330.00				
Congressman Paul McCloskey 208 Cannon Building Washington, D. C. 20515	Williams for Senate Montana	Reimbursement of Expenses	10/3/78	110. ✓
Aggregate General Election Expenditure for this Candidate - \$				
Arthur J. Finkelstein & Associates 13 Third Street Rye, New York 10580	Re-Elect Thurmond Committee South Carolina	Media Advertising	10/3/78	4,703. ✓
Aggregate General Election Expenditure for this Candidate - \$ 1,272,611				
Murphy/Powers Media, Inc. 117 Smith Avenue Mount Kisco, N. Y. 10549	Re-Elect Thurmond Committee South Carolina	Media Advertising	10/3/78	9,050. ✓
Aggregate General Election Expenditure for this Candidate - \$ 1,272,611				

11-15-78  
 Election Commission  
 Street, N.W.  
 Washington, D.C. 20463

POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S)  
 ON BEHALF OF CANDIDATE FOR FEDERAL OFFICE

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

(Supporting Line 24, FEC Form 3)

Page 3 of 20

For Line 24, FEC Form 3

(To be used only by Political Committees in the General Election.)

Name of Political Committee in Full

National Republican Senatorial Committee - Expenditures

Has your Committee been designated to make coordinated expenditures by a political party committee?  YES  NO

If YES, name the designating committee: Republican National and/or Respective State Committees

Full Name, Mailing Address and ZIP Code of Each Payer	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
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D. M. S. Postal Escrow Account 7777 Leesburg Pike Falls Church, Va.	Shasteen for Senate Nebraska	Postage	10/4/78	\$ 1,944 ✓
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Aggregate General Election Expenditure for this Candidate - \$ 219,410.57

Full Name, Mailing Address and ZIP Code of Each Payer	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
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Rodney A. Smith 4836 South 28th Street Arlington, Virginia 22206	Kansans for Kassebaum Kansas	Reimbursement of Expenses	10/5/78	250 ✓
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Aggregate General Election Expenditure for this Candidate - \$ 16,549.29

Full Name, Mailing Address and ZIP Code of Each Payer	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
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Rodney A. Smith 4836 South 28th Street Arlington, Virginia 22206	Bell for Senate Committee New Jersey	Reimbursement of Expenses	10/5/78	250 ✓
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Aggregate General Election Expenditure for this Candidate - \$ 171,298.96

Full Name, Mailing Address and ZIP Code of Each Payer	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
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Rodney A. Smith 4836 South 28th Street Arlington, Virginia 22206	Durenberger for Senate Minnesota	Reimbursement of Expenses	10/5/78	1,157 ✓
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Aggregate General Election Expenditure for this Candidate - \$ 726,789

Full Name, Mailing Address and ZIP Code of Each Payer	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
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Rodney A. Smith 4836 South 28th Street Arlington, Virginia 22206	Citizens for Cochran Mississippi	Reimbursement of Expenses	10/5/78	250 ✓
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Aggregate General Election Expenditure for this Candidate - \$ 13,438

SUBTOTAL of expenditures this page (optional) \$

TOTAL this device (last page this line number only) \$

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POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S)  
 FOR STATE OF CANDIDATES FOR FEDERAL OFFICE  
 (2 U.S.C. 431a(d))  
 (Supporting Line 24, FEC Form 3)

(To be used only by Political Committees in the General Election)

Name of Political Committee in Full  
**National Republican Senatorial Committee - Expenditures**

Has your Committee been designated to make coordinated expenditures by a political party committee?  YES  NO  
 If YES, name the designating committee: **Republican National and/or Respective State Committees**

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Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Rodney A. Smith 4836 South 28th Street Arlington, Virginia 22206	Re-Elect Baker Committee Tennessee	Reimbursement of Expenses	10/5/78	\$ 848. ✓
Aggregate General Election Expenditure for this Candidate - \$ 1574.92				
Rodney A. Smith 4836 South 28th Street Arlington, Virginia 22206	People for Boschwitz Minnesota	Reimbursement of Expenses	10/5/78	707. ✓
Aggregate General Election Expenditure for this Candidate - \$ 707.62				
American Mailing List 7777 Leesburg Pike Falls Church, Va. 22043	Al Simpson for Senate Wyoming	Direct Mail Services	10/5/78	996. ✓
Aggregate General Election Expenditure for this Candidate - \$ 3464.21				
Barre/Lawrence Associates P. O. Box 485 Alexandria, Va. 22313	Warner for Senate Committee Virginia	Consultant Services	10/5/78	1,000. ✓
Aggregate General Election Expenditure for this Candidate - \$ 5702.14				
Automated Business Mail 5515 Livingston Road, S.E. Washington, D.C. 20021	Re-Elect Baker Committee Tennessee	Typing Services	10/5/78	343. ✓
Aggregate General Election Expenditure for this Candidate - \$ 1771.12				

SUBTOTAL of expenditures this page (include): \$  
 TOTAL this period (last page this line number first): \$

POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S)  
 OF EACH OF CANDIDATES FOR FEDERAL OFFICE  
 (2 U.S.C. 441a(d))  
 (Supporting Line 24, FEC Form 3)

(To be used only by Political Committees in the General Election)

Name of Political Committee in Full  
**National Republican Senatorial Committee - Expenditures**

Has your Committee been designated to make coordinated expenditures by a political party committee?  YES  NO  
 If YES, name the designating committee: **Republican National and/or Respective State Committees**

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Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
H. A. Post Associates 1028 Connecticut Ave., N.W. Washington, D. C. 20036	Re-Elect Baker Committee Tennessee	Printing Services	10/5/78	\$ 10
Aggregate General Election Expenditure for this Candidate - \$ 10				

Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Robert Goodman Agency 12 West Read Street Baltimore, Md.	Committee for Senator Griffin Michigan	Media Advertising	10/5/78	20,00 ✓
Aggregate General Election Expenditure for this Candidate - \$ 142,116.79				

Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Mr. Ed Pinto 6715 New Hope Drive Springfield, Va. 22151	Brooke Committee Massachusetts	Reimbursement of Expenses	10/5/78	120 ✓
Aggregate General Election Expenditure for this Candidate - \$ 142,320.20				

Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Ringe/Russo Associates 120 Boylston Street Suite 408 Boston, Mass. 02116	Brooke Committee Massachusetts	Media Advertising	10/5/78	38,000 ✓
Aggregate General Election Expenditure for this Candidate - \$ 142,320.20				

Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Betsy Warren 365 Russett Road Chestnut Hill, Mass. 02167	Brooke Committee Massachusetts	Reimbursement of Expenses	10/6/78	60 ✓
Aggregate General Election Expenditure for this Candidate - \$				

SUBTOTAL of expenditures this page (do not include) \$  
 TOTAL (this page plus all other pages this line number only) \$



POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S)  
 ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE  
 (2 U.S.C. 441 (b))  
 (Supporting Line 24, FEC Form 3)

(To be used only by Political Committees in the General Election)

Name of Political Committee in Full

National Republican Senatorial Committee - Expenditures

Has your Committee been designated to make coordinated expenditures by a political party committee?  YES  NO  
 If YES, name the designating committee: Republican National and/or Respective State Committees

Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Market Opinion Research 28 West Adams Detroit, Michigan 48226	Cohen for Senator Victory '78 Maine	Telephone Poll	10/5/78	\$ 3.5 ✓
Aggregate General Election Expenditure for this Candidate - \$ <u>7825.</u>				
Susan M. Collins c/o Cohen for Senator P. O. Box 1938 Portland, Maine 04104	Cohen for Senator Victory '78 Maine	Consulting Services	10/6/78	5
Aggregate General Election Expenditure for this Candidate - \$ <u>7825.</u>				
Thomas A. Daffron c/o Cohen for Senator P. O. Box 1938 Portland, Maine 04104	Cohen for Senator Victory '78 Maine	Consulting Services	10/6/78	2.5
Aggregate General Election Expenditure for this Candidate - \$ <u>7825.</u>				
David R. Ault c/o Cohen for Senator P. O. Box 1938 Portland, Maine 04104	Cohen for Senator Victory '78 Maine	Consulting Services	10/6/78	25
Aggregate General Election Expenditure for this Candidate - \$ <u>7825.</u>				
Robert S. Tryer c/o Cohen for Senator P. O. Box 1938 Portland, Maine 04104	Cohen for Senator Victory '78 Maine	Consulting Services	10/6/78	80
Aggregate General Election Expenditure for this Candidate - \$ <u>7825.</u>				

SUBTOTAL of expenditures this page (optional) \$

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

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**POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S)  
 OFFICE OF CAMPAIGNS FOR FEDERAL OFFICE  
 (2 U.S.C. 441a(d))  
 (Supporting Line 24, FEC Form 3)**

(To be used only by Political Committees in the General Election)

Name of Political Committee in Full				
National Republican Senatorial Committee - Expenditures				
Has your Committee been designated to make coordinated expenditures by a political party committee? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO				
If YES, name the designating committee: Republican National and/or Respective State Committees				
Full Name, Mailing Address and ZIP Code of Each Payer	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Jane Johnson c/o Cohen for Senator P. O. Box 1938 Portland, Maine 04104	Cohen for Senator Victory '78 Maine	Consulting Services	10/6/78	\$ 27
Aggregate General Election Expenditure for this Candidate - \$ 7,225				
Thomas R. Bright c/o Cohen for Senator P. O. Box 1938 Portland, Maine 04104	Cohen for Senator Victory '78 Maine	Consulting Services	10/6/78	1,30 ✓
Aggregate General Election Expenditure for this Candidate - \$ 78,25				
Market Opinion Research 28 West Adams Detroit, Michigan 48226	Kansans for Kassebaum Kansas	Telephone Poll	10/5/78	5,000 ✓
Aggregate General Election Expenditure for this Candidate - \$ 16,549.24				
Elliott Curson Advertising, Ltd. Western Savings Bank Bldg. Philadelphia, Pa. 19107	Bell for Senate Committee New Jersey	Media Advertising	10/5/78	3,750 ✓
Aggregate General Election Expenditure for this Candidate - \$ 77,214.96				
Midwest Advertising 1024 West Third Street Davenport, Iowa 52802	Friends of Roger Jepsen	Media Advertising	10/6/78	20,000 ✓
Aggregate General Election Expenditure for this Candidate - \$				

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SUBTOTAL of expenditures this page (Section 5) \$  
 TOTAL this period (last page this line number only) \$

NY 1578  
 1100 Connecticut Avenue, N.W.  
 Washington, D.C. 20043

POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S)  
 ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE  
 (2 U.S.C. 441a(d))  
 (Supporting Line 24, FEC Form 3)

Page 6 of 20  
 File Line 24, FEC Form 3

(To be used only by Political Committees in the General Election)

Name of Political Committee in Full  
**National Republican Senatorial Committee - Expenditures**

Has your Committee been designated to make coordinated expenditures by a political party committee?  YES  NO  
 If YES, name the designating committee: **Republican National and/or Respective State Committees**

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Full Name, Mailing Address and ZIP Code of Each Payer	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Martin for U. S. Senate P. O. Box 3406 Birmingham, Alabama 35205	Martin for U. S. Senate Alabama	Section 441 Contribution	10/6/78	\$ 17,00 ✓
Aggregate General Election Expenditure for this Candidate - \$ 17,000				

Full Name, Mailing Address and ZIP Code of Each Payer	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Holder, Kennedy, Dye & Bell 2020 21st Ave., South Nashville, Tenn. 37212	Martin for U. S. Senate Alabama	Media Advertising	10/6/78 week	65,00 ✓
Aggregate General Election Expenditure for this Candidate - \$ 270,000				

Full Name, Mailing Address and ZIP Code of Each Payer	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Woodward-McDowell & Associates 22 Battery Street Suite 404 San Francisco, Ca. 94111	Humphrey for Senate New Hampshire	Media Advertising	10/10/78	40,000 ✓
Aggregate General Election Expenditure for this Candidate - \$ 415,683.50				

Full Name, Mailing Address and ZIP Code of Each Payer	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Eddie Mahe, Jr. 1212 16th Street, N. W. Washington, D. C. 20036	Humphrey for Senate New Hampshire	Reimbursement of Expenses	10/10/78	1,568 ✓
Aggregate General Election Expenditure for this Candidate - \$ 415,683.50				

Full Name, Mailing Address and ZIP Code of Each Payer	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Midwest Advertising 1024 West Third Street Davenport, Iowa 52802	Friends of Roger Jespen Iowa	Media Advertising	10/10/78	25,00 ✓
Aggregate General Election Expenditure for this Candidate - \$ 41,143.50				

SUBTOTAL of expenditures this page (optional) \$ \_\_\_\_\_  
 TOTAL this period (last page this line number only) \$ \_\_\_\_\_

POLITICAL PARTY COMMITTEES OR DESIGNATED AGENTS  
 ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE  
 (2 U.S.C. 441a(d))  
 (Supporting Line 24, FEC Form 3)

(To be used only by Political Committees in the General Election)

Name of Political Committee in Full  
**National Republican Senatorial Committee - Expenditures**

Has your Committee been designated to make coordinated expenditures by a political party committee?  YES  NO  
 If YES, name the designating committee: **Republican National and/or Respective State Committees**

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Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Ringe/Russo Associates 120 Boylston Street Suite 408 Boston, Mass. 02116	Brooke Committee Massachusetts	Media Advertising	10/10/78	\$ 43,00 ✓
Aggregate General Election Expenditure for this Candidate - \$ 143,370.36				

Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Elliott Curson Advertising, Ltd. Western Savings Bank Bldg. Philadelphia, Pa. 19107	Bell for Senate Committee New Jersey	Media Advertising	10/11/78	3,75 ✓
Aggregate General Election Expenditure for this Candidate - \$ 171,295.96				

Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Sisk Mailing Services, Inc. 9800 George Palmer Highway Lanham, Maryland 20801	Al Simpson for Senate Wyoming	Mailing Services	10/11/78	2,35 ✓
Aggregate General Election Expenditure for this Candidate - \$ 346,421				

Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Robert Goodman Agency 12 West Read Street Baltimore, Maryland	Committee for Senator Griffin Michigan	Media Advertising	10/11/78 رسد -	29,00 ✓
Aggregate General Election Expenditure for this Candidate - \$ 17,316.70				

Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
McMaster Associates Public Relations 410 Top of Troy Building Troy, Michigan 48084	Committee for Senator Griffin Michigan	Consulting Services	10/11/78	10,00 ✓
Aggregate General Election Expenditure for this Candidate - \$ 17,316.70				

POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S)  
 ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE  
 (2 U.S.C. 441a(d))  
 (Supporting Line 24, FEC Form 3)

(To be used only by Political Committees in the General Election)

Name of Political Committee in Full

National Republican Senatorial Committee - Expenditures

Has your Committee been designated to make coordinated expenditures by a political party committee?  YES  NO  
 If YES, name the designating committee: Republican National and/or Respective State Committees

77990423015255883

Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Macauley's 15188 West Eight Mile Road Detroit, Michigan 48237	Committee for Senator Griffin Michigan	Office Supplies	10/11/78	\$ 884 ✓
Aggregate General Election Expenditure for this Candidate - \$ 14,2116.79				
Hotel Pontchartrain 2 Washington Boulevard Detroit, Michigan 48226	Committee for Senator Griffin Michigan	Room Accommodations	10/11/78	5,920 ✓
Aggregate General Election Expenditure for this Candidate - \$ 14,2116.79				
Likity-Split Copy Printing 20441 James Couzens Highway Detroit, Michigan 48235	Committee for Senator Griffin Michigan	Printing Services	10/11/78	2,257 ✓
Aggregate General Election Expenditure for this Candidate - \$ 14,2116.79				
Winchester Aviation Cherry Capital Airport Traverse City, Mich. 49684	Committee for Senator Griffin Michigan	Charter Services	10/11/78	2,728 ✓
Aggregate General Election Expenditure for this Candidate - \$ 14,2116.79				
General Aviation Capital City Airport Lansing, Michigan 48906	Committee for Senator Griffin Michigan	Charter Services	10/11/78	7,490 ✓
Aggregate General Election Expenditure for this Candidate - \$ 14,2116.79				

SUBTOTAL of expenditures this page (add all) \$  
 TOTAL this office (last page this line number only) \$



ITEM 2 COORDINATED EXPENDITURES MADE BY  
 POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S)  
 ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE

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

(Supporting Line 24, FEC Form 3)

Page 11 of 20

For Line 24, FEC Form 3

(To be used only by Political Committees in the General Election)

Name of Political Committee in Full

National Republican Senatorial Committee - Expenditures

Has your Committee been designated to make coordinated expenditures by a political party committee?  YES  NO

If YES, name the designating committee: Republican National and/or Respective State Committees

Full Name, Mailing Address and ZIP Code of Each Payer	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Goettler Associates, Inc. Fifty West Broad Street Columbus, Ohio 43215	Committee for Senator Griffin Michigan	Professional Services	10/11/78	\$ 5,000
Aggregate General Election Expenditure for this Candidate - \$142,116.79				
Executive World Travel 1700 K Street, N. W. Suite 1004 Washington, D. C. 20006	Committee for Senator Griffin Michigan	Travel Expenses	10/11/78	3,025
Aggregate General Election Expenditure for this Candidate - \$142,116.79				
Printers II 5141 Frolich Lane Tuxedo, Maryland 20781	Committee for Senator Griffin Michigan	Printing Services	10/11/78	5,634
Aggregate General Election Expenditure for this Candidate - \$142,116.79				
Tri-State Envelope of Maryland, Inc. 6900 Faigle Road Beltsville, Md. 20705	Committee for Senator Griffin Michigan	Envelopes	10/11/78	805
Aggregate General Election Expenditure for this Candidate - \$142,116.79				
Diversified Printing Co. 809 Cameron Street Alexandria, Va. 22314	Committee for Senator Griffin Michigan	Printing Services	10/11/78	3,000
Aggregate General Election Expenditure for this Candidate - \$142,116.79				

SUBTOTAL of expenditures this page (optional) \$

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

77 99 90 42 90 10 5 22 15 15 89 4



ITEM: COORDINATED EXPENDITURE MADE BY  
POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S)  
ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE

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

(Supporting Line 24, FEC Form 3)

Page 20 of 20

For Line 24, FEC Form 3

(To be used only by Political Committees in the General Election)

Name of Political Committee in Full

National Republican Senatorial Committee - Expenditures

Has your Committee been designated to make coordinated expenditures by a political party committee?  YES  NO

If YES, name the designating committee: Republican National and/or Respective State Committees

Full Name, Mailing Address and ZIP Code of Each Payer	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Berlin & Jones Co., Inc. P. O. Box 4294 New York, New York 10049	Committee for Senator Griffin Michigan	Envelopes	10/11/78	\$ 3,000 ✓
Aggregate General Election Expenditure for this Candidate - \$ 142,116.79				
Stephen Winchell & Associates, Inc. 1990 M Street, N. W. Suite 310 Washington, D. C. 20036	Committee for Senator Griffin Michigan	Direct Mail Consulting	10/11/78	5,000 ✓
Aggregate General Election Expenditure for this Candidate - \$ 142,116.79				
Envelopes Unlimited 649 N. Horners Lane Rockville, Maryland 20850	Committee for Senator Griffin Michigan	Envelopes	10/11/78	950 ✓
Aggregate General Election Expenditure for this Candidate - \$ 142,116.79				
General Typographers, Inc. 927 H Street, N. W. Washington, D. C. 20001	Committee for Senator Griffin Michigan	Printing Services	10/11/78	500 ✓
Aggregate General Election Expenditure for this Candidate - \$ 142,116.79				
Hendricks-Miller Typographic Company 2363 Champlain St., N. W. Washington, D. C. 20009	Committee for Senator Griffin Michigan	Printing Services	10/11/78	300 ✓
Aggregate General Election Expenditure for this Candidate - \$ 142,116.79				

SUBTOTAL of expenditures this page (optional) \$

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

799029010521516805

POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S)  
 ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE

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

(Supporting Line 24, FEC Form 3)

(To be used only by Political Committees in the General Election)

Name of Political Committee in Full

National Republican Senatorial Committee - Expenditures

Has your Committee been designated to make coordinated expenditures by a political party committee?  YES  NO

If YES, name the designating committee: Republican National and/or Respective State Committees

Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
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Mattera Litho., Inc. 5124 Frolich Lane Cheverly, Maryland 20781	Committee for Senator Griffin Michigan	Printing Services	10/11/78	\$ 1,100 ✓
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Aggregate General Election Expenditure for this Candidate - \$ 1,100.79

Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
---	--	----------------------------	-------------------------	--------

Autopen International 3121 Washington Blvd. Arlington, Va. 22201	Committee for Senator Griffin Michigan	Autopen Matrix	10/11/78	115 ✓
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Aggregate General Election Expenditure for this Candidate - \$ 14,216.79

Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
---	--	----------------------------	-------------------------	--------

Communications Corp. of America 1 Direct Marketing Plaza Boston, Virginia 22713	Committee for Senator Griffin Michigan	Direct Mail Services	10/11/78	163 ✓
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Aggregate General Election Expenditure for this Candidate - \$ 14,216.79

Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
---	--	----------------------------	-------------------------	--------

Metro Printing 8446 Lee Highway Fairfax, Virginia 22030	Committee for Senator Griffin Michigan	Printing Services	10/11/78	2,036 ✓
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Aggregate General Election Expenditure for this Candidate - \$ 14,216.79

Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
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Automated Correspondence Systems 2120 L Street, N. W. Washington, D. C. 20037	Committee for Senator Griffin Michigan	Typing Services	10/11/78	5,164 ✓
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Aggregate General Election Expenditure for this Candidate - \$ 14,216.79

SUBTOTAL of expenditures this page (optional)

TOTAL this period (last page this line number only)

77-9900-29010522-15-15-81-6

ON BEHALF OF CANDIDATE FOR FEDERAL OFFICE  
 (2 U.S.C. 441a(d))  
 (Supporting Line 24, FEC Form 3)

(To be used only by Political Committees in the General Election)

Name of Political Committee in Full

National Republican Senatorial Committee - Expenditures

Has your Committee been designated to make coordinated expenditures by a political party committee?  YES  NO  
 If YES, name the designating committee: Republican National and/or Respective State Committees

Full Name, Mailing Address and ZIP Code of Each Payer	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Sisk Mailing Services, Inc. 9800 George Palmer Highway Lanham, Maryland 20801	Committee for Senator Griffin Michigan	Mailing Services	10/11/78	\$ 7,000 ✓
Aggregate General Election Expenditure for this Candidate - \$ 142,116.79				
Wiland & Associates 219 East Davis Street Culpeper, Virginia 22701	Committee for Senator Griffin Michigan	Computer Services	10/11/78	10,00 ✓
Aggregate General Election Expenditure for this Candidate - \$ 142,116.79				
Eastern Airlines National Airport Washington, D. C. 20001	Kansans for Kassebaum Kansas	Air Freight Service	10/11/78	3
Aggregate General Election Expenditure for this Candidate - \$ 16,549.29				
Romanek Golub & Co. 8 S. Michigan Ave. 625 N. Michigan Ave. Chicago, Illinois 60611	Citizens for Percy Illinois	Rent & Utilities	10/11/78	1,26 ✓
Aggregate General Election Expenditure for this Candidate - \$ 13,574.11				
Holiday Inn I-57 at Illinois 13 Morton, Illinois 62959	Citizens for Percy Illinois	Hotel Accommodations	10/11/78	6 ✓
Aggregate General Election Expenditure for this Candidate - \$ 7,500.00				

71990129010521516827

SUBTOTAL of expenditures this page (optional)

TOTAL this period (last page this line number only)

\$  
\$

COORDINATED EXPENDITURES MADE BY  
POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S)  
ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE

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

(Supporting Line 24, FEC Form 3)

Page 15 of 20

For Line 24, FEC Form 3

(To be used only by Political Committees in the General Election)

Name of Political Committee in Full

National Republican Senatorial Committee - Expenditures

Has your Committee been designated to make coordinated expenditures by a political party committee?  YES  NO

If YES, name the designating committee: Republican National and/or Respective State Committees

Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
National Direct Mail Services Suite 530 4733 Bethesda Avenue Bethesda, Maryland 20014	Citizens for Percy Illinois	Direct Mail Services	10/11/78	\$ 2,520. ✓
Aggregate General Election Expenditure for this Candidate - \$1,352,585				
Holiday Inn - Chicago City Centre 300 East Ohio Street Chicago, Illinois 60611	Citizens for Percy Illinois	Hotel Accommodations	10/11/78	1,828. ✓
Aggregate General Election Expenditure for this Candidate - \$1,352,585				
Ruth Jones, Ltd. 123 E. 75th Street New York, New York 10021	Bell for Senate Committee New Jersey	Media Advertising	10/12/78	40,000. ✓
Aggregate General Election Expenditure for this Candidate - \$1,712,989.11				
Robert M. Smalley Committee for Senator Griffin 333 West Fort Street Detroit, Michigan 48226	Committee for Senator Griffin Michigan	Consulting Services & Reimbursed Expenses	10/13/78	4,281. ✓
Aggregate General Election Expenditure for this Candidate - \$1,712,989.11				
Suburban Keypunch Service 3831 38th Street Brentwood, Md. 20722	Press for Senate South Dakota	Keypunch Services	10/13/78	900. ✓
Aggregate General Election Expenditure for this Candidate - \$1,712,989.11				

SUBTOTAL of expenditures this page (optional):

TOTAL this period (last page this line number only)

77-990-29010-221515-838



ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE  
 (Supporting Line 24, FEC Form 3)

(To be used only by Political Committees in the General Election)

Page 30, 31, 32

Name of Political Committee in Full:

National Republican Senatorial Committee - Expenditures

Has your Committee been designated to make coordinated expenditures by a political party committee?  YES  NO

If YES, name the designating committee: Republican National and/or Respective State Committees

Full Name, Mailing Address and ZIP Code of Each Payer	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Woltz & Associates 520 West Franklin Street Richmond, Virginia 23220	Warner for Senate Committee Virginia	Media Advertising	10/16/78	\$200
Aggregate General Election Expenditure for this Candidate - \$ 3,632.30				
Mary Mower National Republican Senatorial Committee 227 Massachusetts Ave., N.E. Washington, D. C. 20002	Brooke Committee Massachusetts	Expense Advance	10/16/78	
Aggregate General Election Expenditure for this Candidate - \$ 14,230.20				
Ringe/Russo Associates 120 Boylston Street Suite 408 Boston, Mass. 02116	Brooke Committee Massachusetts	Media Advertising	10/16/78	43,000
Aggregate General Election Expenditure for this Candidate - \$ 14,230.20				
Swanson, Sinkey & Ellis 1222 P Street Lincoln, Nebraska 68508	Shasteen for Senate Nebraska	Media Advertising	10/16/78	3,000
Aggregate General Election Expenditure for this Candidate - \$ 4,111.05				
Elliott Curson Advertising, Ltd. 1001 Western Savings Bank Building Philadelphia, Pa. 19107	Bell for Senate Committee New Jersey	Media Advertising	10/17/78	6,000
Aggregate General Election Expenditure for this Candidate - \$ 17,213.46				

SUBTOTAL of expenditures this page (include)

TOTAL this period (last page (first line number only))

79790200056489



Election Committee  
 Street, R.M.  
 Street, D.C. 20460

ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE  
 (2 U.S.C. 441a(d))  
 (Supporting Line 24, FEC Form 3)

The Line 24, FEC Form 3

(To be used only by Political Committees in the General Election)

Name of Political Committee in Full

National Republican Senatorial Committee - Expenditures

Has your Committee been designated to make coordinated expenditures by a political party committee?  YES  NO  
 If YES, name the designating committee: Republican National and/or Respective State Committees

Full Name, Mailing Address and ZIP Code of Each Payer	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Atkinson Advertising Associates 5500 N. Western, Suite 101A Oklahoma City, Oklahoma 73118	Oklahomans for Bob Kamm Oklahoma	Media Advertising	10/17/78	\$ 25,000 ✓
Aggregate General Election Expenditure for this Candidate - \$ 25,000.				
Communication Specialists P. O. Box 1529 Austin, Texas 78767	Texans for Tower	Direct Mail Services	10/17/78	90,000 ✓
Aggregate General Election Expenditure for this Candidate - \$ 175,000.				
Ruth Jones, Ltd. 123 E. 75th Street New York, New York 10021	Bell for Senate Committee New Jersey	Media Advertising	10/19/78	40,000 ✓
Aggregate General Election Expenditure for this Candidate - \$ 171,298.96				
Holder, Kennedy, Dye & Bell 2020 21st Ave., South Nashville, Tenn. 37212	Martin for U. S. Senate Alabama	Media Advertising	10/19/78	29,500 ✓
Aggregate General Election Expenditure for this Candidate - \$ 57,000.				
Xerox Corporation P. O. Box 96300 Chicago, Illinois 60693	Citizens for Percy Illinois	Office Equipment	10/19/78	30,000 ✓
Aggregate General Election Expenditure for this Candidate - \$ 1,200.00				

77,990,290.053156950

SUBTOTAL of expenditures this page (include) \$  
 TOTAL this period (last page this line number only) \$

File in Commission  
 Street, N.Y.  
 Box L.C. 20403

ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE  
 (2 U.S.C. 441a(d))  
 (Supporting Line 26, FEC Form 3)

For Line 26, FEC Form 3

(To be used only by Political Committees in the General Election)

Name of Political Committee in Full  
 National Republican Senatorial Committee - Expenditures

Has your Committee been designated to make coordinated expenditures by a political party committee?  YES  NO  
 If YES, name the designating committee: Republican National and/or Respective State Committees

779901290521568

Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
---	--	----------------------------	-------------------------	--------

Capitol Hill Club 300 First Street, S. E. Washington, D. C. 20003	Citizens for Percy Illinois	Reception	10/19/78	\$ 97
Aggregate General Election Expenditure for this Candidate - \$ 1,352,850				

Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
---	--	----------------------------	-------------------------	--------

George Herrman & Company 125 South Wacker Drive Chicago, Illinois 60606	Citizens for Percy Illinois	Insurance (Workmen's Compensation)	10/19/78	91
Aggregate General Election Expenditure for this Candidate - \$ 1,352,850				

Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
---	--	----------------------------	-------------------------	--------

Carpenter Computer Service, Inc. 2775 Algonquin Road Rolling Meadows, Illinois 60008	Citizens for Percy Illinois	Computer Services	10/19/78	807
Aggregate General Election Expenditure for this Candidate - \$ 1,352,850				

Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
---	--	----------------------------	-------------------------	--------

Crown Office Products Co. P. O. Box 95252 Chicago, Illinois 60690	Citizens for Percy Illinois	Office Supplies	10/19/78	190
Aggregate General Election Expenditure for this Candidate - \$ 1,352,850				

Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
---	--	----------------------------	-------------------------	--------

Mr. Ed Pinto 6715 New Hope Drive Springfield, Virginia 22151	Brooke Committee Massachusetts	Consulting and Reimbursement of Expenses	10/19/78	2,826
Aggregate General Election Expenditure for this Candidate - \$ 1,352,850				

SUBTOTAL of expenditures (this page only) \$

TOTAL (to be printed next page this line number only) \$

POLITICAL PARTY COMMITTEES ON DESIGNATED  
 ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE  
 (2 U.S.C. 441(a))  
 (Supporting Line 24, FEC Form 3)

(To be used only by Political Committees in the General Election)

Name of Political Committee in Full

National Republican Senatorial Committee - Expenditures

Has your Committee been designated to make coordinated expenditures by a political party committee?  YES  NO  
 If YES, name the designating committee: Republican National and/or Respective State Committees

Full Name, Mailing Address and ZIP Code of Each Payer	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Elliott Curson Advertising, Ltd. 1001 Western Savings Bank Building Philadelphia, Pa. 19107	Bell for Senate Committee New Jersey	Media Advertising	10/19/78	\$ 3,710
Aggregate General Election Expenditure for this Candidate - \$ 171,213.96				
Aloysius, Butler & Clark 1211 French Street Wilmington, Delaware 19801	Baxter for Senate Delaware	Media Advertising	10/19/78	7,640
Aggregate General Election Expenditure for this Candidate - \$ 38,640.57				
Rick Elliott, Inc. 1306 N. Clayton Wilmington, Delaware 19806	Baxter for Senate Delaware	Media Advertising	10/19/78	7,600
Aggregate General Election Expenditure for this Candidate - \$ 38,640.57				
King Travel Service The King Building P. O. Box 1494 Topeka, Kansas 66601	Kansans for Kassebaum Kansas -	Airline Tickets	10/19/78	100
Aggregate General Election Expenditure for this Candidate - \$ 16,549.27				
Robert Goodman Agency 12 West Read Street Baltimore, Maryland	Moore for U. S. Senate West Virginia	Media Advertising	10/20/78	27,000
Aggregate General Election Expenditure for this Candidate - \$ 2,100.00				

SUBTOTAL of Expenditures (Use this line only if applicable)

TOTAL of Expenditures (Use this line number only)

77 99 00 42 00 10 52 15 16 972

ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE

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

(Supporting Form 24, FEC Form 3)

(To be used only by Political Committees in the General Election)

Form 24, 11-78  
 Revised: D.C. 10/83

Print Name of Candidate

Name of Political Committee in Full

National Republican Senatorial Committee - Expenditures

Has your Committee been designated to make coordinated expenditures by a political party committee?  YES  NO  
 If YES, name the designating committee: Republican National and/or Respective State Committees

Full Name, Mailing Address and ZIP Code of Each Payer	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Robert Goodman Agency 12 West Read Street Baltimore, Maryland	Kansans for Kassebaum Kansas	Media Advertising	10/20/78	\$ 10,000
Aggregate General Election Expenditure for this Candidate - \$ 10,000				
Betsy R. Warren 2804 Dumbarton St., N. W. Washington, D. C. 20007	Brooke Committee - Massachusetts	Fundraising Consultant fee	10/5/78	2,500
Aggregate General Election Expenditure for this Candidate - \$ 142,320.20				
Aggregate General Election Expenditure for this Candidate - \$				
Aggregate General Election Expenditure for this Candidate - \$				
Aggregate General Election Expenditure for this Candidate - \$				
SUBTOTAL of expenditures this page (Section 4)				\$
TOTAL for all pages (last page this line number only)				\$ 1875.00

7 7779 1002 05025 6189 3



FORM 1  
 July, 1978  
 Federal Election Commission  
 1100 L Street, N.W.  
 Washington, D.C. 20543

ITEMS OF COORDINATED EXPENDITURES MADE BY  
 POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S)  
 ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE  
 (2 U.S.C. 441a(d))  
 (Supporting Line 24, FEC Form 3)

Form 24, FEC Form 3

(To be used only by Political Committees in the General Election)

7790420010521516995

Name of Political Committee in Full					
National Republican Senatorial Committee - Expenditures					
Has your Committee been designated to make coordinated expenditures by a political party committee?				<input type="checkbox"/> YES	<input type="checkbox"/> NO
If YES, name the designating committee:					
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount	
Steven Saunders Natl. Republican Sent. Comm. 227 Massachusetts Ave., N.E. Washington, D.C. 20002	Salary \$908.31 In-kind contribution- People for Boschwitz, Minnesota Senate	Salary	3-30-78	15.00	
	Aggregate General Election Expenditure for this Candidate - \$				
Communications Corp. of America 1 Direct Marketing Plaza Boston, VA 22713	In-kind contribution People for Boschwitz Comm. (MN Senate) (printing services)	Printing Services	June '78	219.1	
	Aggregate General Election Expenditure for this Candidate - \$				
Rodney A. Smith 4836 South 28th Street Arlington, VA 22206	In-kind expenditure to the Victory '78 Comm. (ME Senate) (consulting and expenses)	Consulting & Expenses	8-3-78	267.2	
	Aggregate General Election Expenditure for this Candidate - \$				
Rodney A. Smith 4836 South 28th Street Arlington, VA 22206	Allocated expenditure to Friends of Roger Jepsen (IA, Senate) (consulting and expenses)	Consulting & Expenses	8-3-78	531.4	
	Aggregate General Election Expenditure for this Candidate - \$				
Rodney A. Smith 4836 South 28th Street Arlington, VA 22206	Allocated expenditure to People for Boschwitz (MN, Senate) (Consulting and expenses)	Consulting & Expenses	8-3-78	531	
	Aggregate General Election Expenditure for this Candidate - \$				
SUBTOTAL of expenditures this page (optional)				\$	
TOTAL this period (last page this line number only)				\$	



FORM 1  
July, 1978  
Federal Election Commission  
1215 G Street, N.W.  
Washington, D.C. 20463

ITEM D COORDINATED EXPENDITURE MADE BY  
POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S)  
ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE  
(2 U.S.C. 441a(d))  
(Supporting Line 24, FEC Form 3)

Page 1 of 2  
For Line 24, FEC Form 3

(To be used only by Political Committees in the General Election)

Name of Political Committee in Full National Republican Senatorial Committee - Expenditures				
Has your Committee been designated to make coordinated expenditures by a political party committee? <input type="checkbox"/> YES <input type="checkbox"/> NO				
If YES, name the designating committee				
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Rodney A. Smith 4836 South 28th Street Arlington, VA 22206	Allocated expenditure to Cochran for Senate, MS (Consulting & expenses)	Consulting & Expenses	8-3-78	286.05
Aggregate General Election Expenditure for this Candidate - \$				
Rodney A. Smith 4836 South 28th Street Arlington, VA 22206	Allocated expenditure to Obenshain for Senate, VA (Consulting & Expenses)	Consulting & Expenses	8-3-78	282.00
Aggregate General Election Expenditure for this Candidate - \$				
Rodney A. Smith 4836 South 28th Street Arlington, VA 22206	In-kind expenditure to Cochran for Senate, MS (Consulting & Expenses)	Consulting & Expenses	9-13-78	872.80
Aggregate General Election Expenditure for this Candidate - \$				
Mary Hasenfus Natl. Republican Sent. Comm. 227 Massachusetts Ave., N.E. Washington, D.C. 20002	In-kind contribution Brooke Committee, MASS (reimbursed travel & lodging)	Travel & Lodging Expenses	9-28-78	212.50
Aggregate General Election Expenditure for this Candidate - \$				
John Mooring Natl. Republican Sent. Comm. 227 Massachusetts Ave., N.E. Washington, D.C. 20002	In-kind contribution to Richardson for Congress, Utah (videotaping)	Videotaping	Sept. '78	25.00
Aggregate General Election Expenditure for this Candidate - \$				
SUBTOTAL of expenditures this page (omit "paid")				\$
TOTAL this period (last page this line number only)				\$

7 2 9 0 2 3 0 1 4 5 2 5 7 2 0

FORM 7  
 1978  
 Federal Election Commission  
 1100 K Street, N.W.  
 Washington, D.C. 20043

ITEMIZED COORDINATED EXPENDITURES MADE BY  
 POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S)  
 ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE  
 (2 U.S.C. 441a(d))  
 (Supporting Line 24, FEC Form 3)

Page 3 of 3  
 For Line 24, FEC Form 3

(To be used only by Political Committees in the General Election)

Name of Political Committee in Full				
National Republican Senatorial Committee - Expenditures				
Has your Committee been designated to make coordinated expenditures by a political party committee? <input type="checkbox"/> YES <input type="checkbox"/> NO				
If YES, name the designating committee				
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
John Mooring Nat'l. Republican Sen. Comm. 227 Massachusetts Ave., N.E. Washington, D.C. 20002	In-kind contribution to Simpson for Senate Comm Wyoming (videotaping)	Videotaping	Sept. '78	25.00
Aggregate General Election Expenditure for this Candidate -- \$				
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Communications Televideo Ltd. 918 Sligo Ave. Silver Spring, MD 20910	In-kind contribution to Simpson for Senate WY (videotape cassetts)	Videotape Cassette	Sept. '78	23.00
Aggregate General Election Expenditure for this Candidate -- \$				
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Aggregate General Election Expenditure for this Candidate -- \$				
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Aggregate General Election Expenditure for this Candidate -- \$				
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Aggregate General Election Expenditure for this Candidate -- \$				
SUBTOTAL of expenditures this page (optional)				\$
TOTAL this period (last page this line number only)				\$ 3,299

777970420010522157917

REPORT OF  
 NAME  
 DATE, 1978  
 Filing Election Commission  
 25 K Street, N.W.  
 Washington, D.C. 20463

**ITEMIZED EXPENDITURES**

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

Line Number \_\_\_\_\_  
 (Use Separate Schedules for  
 each numbered line)

Name of Candidate or Committee in Full

National Republican Senatorial Committee

8645151792  
 7732020452

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Martin For U. S. Senate P. O. Box 3406 Birmingham, Alabama 35205	Sec. 441 Contribution  Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	10-6-78	\$17,000.00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure  Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure  Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure  Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure  Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure  Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure  Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure  Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period

SUBTOTAL of expenditures this page (optional) \$17,000.00

TOTAL this period (last page this line number only) \$17,000.00

ANNEXMENT

ANNEXMENT  
 COORDINATED EXPENDITURES MADE BY  
 POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S)  
 ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE  
 (2 U.S.C. 4311(d))  
 (Supporting Line 24, FEC Form 3)

Page 1 of 2  
 For Line 24, FEC Form

(To be used only by Political Committees in the General Election)

FORM 1  
 January 1978  
 Federal Election Commission  
 325 K Street, N.W.  
 Washington, D.C. 20463

Name of Political Committee in Full  
**National Republican Senatorial Committee**

Has your Committee been designated to make coordinated expenditures by a political party committee?  YES  NO  
 If YES, name the designating committee

Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Dorothy Jordan Associates, Route 114 East Sebago, Maine	Bill Cohen U.S. Senate Maine	Housing	9-1-78	\$1,500
Aggregate General Election Expenditure for this Candidate - \$				
The Postmaster United States Senate Washington, D. C. 20510	Thad Cochran U.S. Senate Mississippi	Postage	9-20-78	127.
Aggregate General Election Expenditure for this Candidate - \$				
The Postmaster United States Senate Washington, D. C. 20510	Bill Armstrong U.S. Senate Colorado	Postage	9-21-78	7
Aggregate General Election Expenditure for this Candidate - \$				
The Postmaster U.S. Postal System	Don Shasteen U.S. Senate Nebraska	Postage	9-21-78	3,000
Aggregate General Election Expenditure for this Candidate - \$				
Automated Business Mail 5515 Livingston Road Washington, D. C. 20021	David Durenberger U.S. Senate Minnesota	Typing Services	9-26-78	2,090
Aggregate General Election Expenditure for this Candidate - \$				

SUBTOTAL of expenditures this page (optional) \$ 6,792.  
 TOTAL this period (last page this line number only) \$

7 7709 102 0502 1399



SCHEDULE F  
 May, 1978  
 Federal Election Commission  
 25 K Street, N.W.  
 Washington, D.C. 20463

ITEMIZED COORDINATED EXPENDITURE MADE BY  
 POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S)  
 ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE  
 (2 U.S.C. 441a(d))  
 (Supporting Line 24, FEC Form 3)

Page 2 of 2  
 For Line 24, FEC Form 3

(To be used only by Political Committees in the General Election)

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Name of Political Committee in Full				
National Republican Senatorial Committee				
Has your Committee been designated to make coordinated expenditures by a political party committee? <input type="checkbox"/> YES <input type="checkbox"/> NO				
If YES, name the designating committee:				
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
United Airlines Dept. 745711 P. O. Box 36022M Pittsburgh, Penns. 15250	Nancy Kassebaum U.S. Senate Kansas	Air Travel	9-26-78	305.00
	Aggregate General Election Expenditure for this Candidate -- \$			
Communications corp. of America #1 Direct Marketing Plaza Boston, VA 22713	David Durenberger U.S. Senate Minnesota	Direct Mail Services	9-27-78	8,929.8
	Aggregate General Election Expenditure for this Candidate -- \$			
National Direct Mail Service Inc. 2233 Wisc. Ave., N.W. #800 Wash, D.C. 20007	David Durenberger U.S. Senate Minnesota	Direct Mail Services	9-27-78	7,140.0
	Aggregate General Election Expenditure for this Candidate -- \$			
	Aggregate General Election Expenditure for this Candidate -- \$			
	Aggregate General Election Expenditure for this Candidate -- \$			
SUBTOTAL of expenditures this page (optional)				\$23,167
TOTAL this period (last page this line number only)				\$23,167



POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S)  
 OFFICIAL OF CANDIDATES FOR FEDERAL OFFICE  
 (2 U.S.C. 441a(d))  
 (Supporting Line 24, FEC Form 3)

Page 4 of 58

FEC Form 24, 11C Form 3

(To be used only by Political Committees in the General Election)

Name of Political Committee in Full

National Republican Senatorial Committee-Expenditures

Has your Committee been designated to make coordinated expenditures by a political party committee?  YES  NO  
 If YES, name the designating committee: Republican National and/or Respective State Committees

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Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Daniels & Associates, Inc. 400 Office Park Drive Birmingham, Alabama 35223	Martin for U.S. Senate Alabama	Media Advertising & Programming	9-1-78	\$ 25,00
Aggregate General Election Expenditure for this Candidate - \$ 20,000				
R. J. Sann & Associates 630 - 9th Avenue New York, New York 10030	Kansans for Kassebaum Kansas	Media Advertising	9-1-78	20
Aggregate General Election Expenditure for this Candidate - \$ 296,18				
Monarch Printing Corp. 1130 West Adams Street Chicago, Illinois 60607	Citizens for Percy Illinois	Printing services	9-5-78	1,6
Aggregate General Election Expenditure for this Candidate - \$ 41,000,41				
Romanek Golub & Company 8 South Michigan Ave. 625 N. Michigan Ave. Chicago, Illinois 60611	Citizens for Percy Illinois	Monthly rent for office space	9-5-78	1,4
Aggregate General Election Expenditure for this Candidate - \$ 4,600,41				
Bailey, Deardourff & Associates Suite #1120 733 - 15th St., N. W. Washington, D. C. 20005	Citizens for Percy Illinois	Media Advertising	9-5-78	10,0
Aggregate General Election Expenditure for this Candidate - \$ 10,000,41				

SUBTOTAL of expenditures this page (addition) \$

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

POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S)  
ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE  
(2 U.S.C. 441a(d))  
(Supporting Line 24, FEC Form 3)

Page 2 of 27  
For Line 24, FEC Form 3

(To be used only by Political Committees in the General Election)

Name of Political Committee in Full

National Republican Senatorial Committee

Has your Committee been designated to make coordinated expenditures by a political party committee?  YES  NO

If YES, name the designating committee: Republican National and/or Respective State Committees

Full Name, Mailing Address and ZIP Code of Each Payer	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Wendt Advertising P. O. Box 2128 Great Falls, Montana 59403	Williams for Senate Montana	Media Advertising	9-6-78	\$ 10,00 ✓
Aggregate General Election Expenditure for this Candidate - <u>5164.00</u>				

Full Name, Mailing Address and ZIP Code of Each Payer	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Ruth Jones, Ltd. 123 East 75th Street New York, New York 10021	Bell for Senate Comm. New Jersey	Media Advertising	9-6-78	25,00 ✓
Aggregate General Election Expenditure for this Candidate - <u>5297.50</u>				

Full Name, Mailing Address and ZIP Code of Each Payer	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Envelopes Unlimited, Inc. 649 N. Horners Lane Rockville, Maryland 20850	Durenberger for Senate Minnesota	Envelopes	9-7-78	19 ✓
Aggregate General Election Expenditure for this Candidate - <u>568,057.30</u>				

Full Name, Mailing Address and ZIP Code of Each Payer	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Communication Specialists, Inc. P. O. Box 1529 Austin, Texas 78767	Texans for Tower Texas	Printing services	9-11-78	52,18 ✓
Aggregate General Election Expenditure for this Candidate - <u>50,754.65</u>				

Full Name, Mailing Address and ZIP Code of Each Payer	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
J. Bruce Hildebrand 192 Twiggs Corner Peachtree City, Georgia 30269	Bell for Senate Comm. New Jersey	Political Consulting	9-8-78	2,5 ✓
Aggregate General Election Expenditure for this Candidate - <u>50,750</u>				

SUBTOTAL of expenditures this page (optional)

TOTAL this period (list page this line number only)

\$  
\$

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ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE  
 (2 U.S.C. 441a(d))  
 (Supporting Line 24, FEC Form 3)

(To be used only by Political Committees in the General Election)

Name of Political Committee in Full

National Republican Senatorial Committee-Expenditures

Has your Committee been designated to make coordinated expenditures by a political party committee?  YES  NO  
 If YES, name the designating committee: Republican National and/or Respective State Committees

Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
The Marti Company 7801 Metro Parkway Minneapolis, Minnesota 55420	People for Boschwitz Minnesota	Media Advertising	9-12-78	\$ 25,000 ✓
Aggregate General Election Expenditure for this Candidate - \$ 40,750				
David R. Ault P. O. Box 1938 Portland, Maine 04104	Cohen for Senator Maine	Political Consultant	9-12-78	2 ✓
Aggregate General Election Expenditure for this Candidate - \$ 25,647.15				
Jane Johnson P. O. Box 1938 Portland, Maine 04104	Cohen for Senator Maine	Political Consultant	9-12-78	2 ✓
Aggregate General Election Expenditure for this Candidate - \$ 25,647.15				
Thomas A. Daffron P. O. Box 1938 Portland, Maine 04104	Cohen for Senator Maine	Political Consultant	9-12-78	2,5 ✓
Aggregate General Election Expenditure for this Candidate - \$ 25,647.15				
Robert S. Tyrer P. O. Box 1938 Portland, Maine 04104	Cohen for Senator Maine	Political Consultant	9-12-78	2 ✓
Aggregate General Election Expenditure for this Candidate - \$ 25,647.15				

SUBTOTAL of expenditures this page (optional)

\$

TOTAL this period (last page this line number only)

\$

ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE  
 (2 U.S.C. 441a(d))  
 (Supporting Line 24, FEC Form 3)

(To be used only by Political Committees in the General Election)

Name of Political Committee in Full

National Republican Senatorial Committee-Expenditures

Has your Committee been designated to make coordinated expenditures by a political party committee?  YES  NO  
 If YES, name the designating committee: Republican National and/or Respective State Committees

Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Susan M. Collins P. O. Box 1938 Portland, Maine 04104	Cohen for Senator Maine	Political Consultant	9-12-78	\$ 90
Aggregate General Election Expenditure for this Candidate - \$ 25,647.15				
Thomas R. Bright P. O. Box 1938 Portland, Maine 04104	Cohen for Senator Maine	Political Consultant	9-12-78	1,30
Aggregate General Election Expenditure for this Candidate - \$ 25,647.15				
National Direct Mail Services, Inc. 2233 Wisconsin Ave., N.W. Suite #400 Washington, D. C. 20007	Citizens for Percy Illinois	Direct Mail service	9-12-78	3,88
Aggregate General Election Expenditure for this Candidate - \$ 4,626.41				
Baxter for Senate Suite #62 Independence Mall Wilmington, Delaware 19801	Jim Baxter U. S. Senate Delaware	Sec. 441 Contribution	9-12-78	5,00
Aggregate General Election Expenditure for this Candidate - \$ 4,571.11				
The Robert Goodman Agency 12 West Road Street Baltimore, Maryland 21201	Moore for U.S. Senate West Virginia	Advertising Displays	9-13-78	35,0
Aggregate General Election Expenditure for this Candidate - \$ 35,000.00				

SUBTOTAL of expenditures this page (add only) \$

TOTAL this period (add page this line number only) \$

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POLITICAL PARTY COMMITTEE OR DESIGNATED COMMITTEE  
 ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE  
 (2 U.S.C. 441a(d))  
 (Supporting Line 24, FEC Form 3)

(To be used only by Political Committees in the General Election)

Name of Political Committee in Full  
**National Republican Senatorial Committee-Expenditures**

Has your Committee been designated to make coordinated expenditures by a political party committee?  YES  NO  
 If YES, name the designating committee: **Republican National and/or Respective State Committees**

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Full Name, Mailing Address and ZIP Code of Each Payer	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Al Simpson for Senate P. O. Box 1978 Cody, Wyoming 82414	Al Simpson U. S. Senate Wyoming	Sec. 441 Contribution	9-13-78	\$ 15,00
Aggregate General Election Expenditure for this Candidate - \$ 150,650.25				

Full Name, Mailing Address and ZIP Code of Each Payer	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
The Marti Company 7801 Metro Parkway Minneapolis, Minnesota 55420	People for Boschwitz Minnesota	Media Advertising	9-13-78	15,00
Aggregate General Election Expenditure for this Candidate - \$ 40,730				

Full Name, Mailing Address and ZIP Code of Each Payer	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Baxter for Senate Suite #62 Independence Mall Wilmington, Dela. 19803	Jim Baxter U. S. Senate Delaware	Sec. 441 Contribution	9-13-78	5,00
Aggregate General Election Expenditure for this Candidate - \$ 45,600				

Full Name, Mailing Address and ZIP Code of Each Payer	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Humphrey for Senate P. O. Box 28 Concord, New Hampshire 03301	Gordon Humphrey U. S. Senate New Hampshire	Sec. 441 Contribution	9-13-78	5,00
Aggregate General Election Expenditure for this Candidate - \$ 15,260				

Full Name, Mailing Address and ZIP Code of Each Payer	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
NewHait Management Co. Plaza Associates Account Suite #110 5660 S. Syracuse Circle Englewood, Colorado 80110	Armstrong Campaign Committee Colorado	Monthly Rent for office space	9-13-78	3,00
Aggregate General Election Expenditure for this Candidate - \$ 34,030				

SUBTOTAL of expenditures (this page optional) \$  
 TOTAL (this period; last page; this line number only) \$



ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE  
 (U.S.C. 411-414)  
 (Supporting Line 24, F.E.C. Form 3)

(To be used only by Political Committees in the General Election)

Name of Political Committee in Full

National Republican Senatorial Committee-Expenditures

Has your Committee been designated to make coordinated expenditures by a political party committee?  YES  NO  
 If YES, name the designating committee: Republican National and/or Respective State Committees

Full Name, Mailing Address and ZIP Code of Each Payer	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Taurus Productions 2502 E. Pikes Peak Ave. Colorado Springs, Colo. 80909	Armstrong Campaign Committee Colorado	Production service for television	9-13-78	\$ 2,86
Aggregate General Election Expenditure for this Candidate - \$ 54000				
Decision Making Information Suite #800 2700 N. Main Street Santa Ana, California 92701	Armstrong Campaign Committee Colorado	Polling	9-13-78	18,00
Aggregate General Election Expenditure for this Candidate - \$ 84000				
Ideas for Advertising, Inc. Suite #290 1715 Monterey Road Colorado Springs, Colo. 80910	Armstrong Campaign Committee Colorado	Advertising Production	9-13-78	16,94
Aggregate General Election Expenditure for this Candidate - \$ 54000				
Cottrell Printing 6701 South Emporis Englewood, Colo. 80112	Armstrong Campaign Committee Colorado	Printing services	9-13-78	90
Aggregate General Election Expenditure for this Candidate - \$ 54000				
Roger Ailes & Associates 230 Central Park South New York, New York 10019	Armstrong Campaign Committee Colorado	Media Consultant	9-13-78	3.00
Aggregate General Election Expenditure for this Candidate - \$ 54000				

SUBTOTAL of expenditures this page (optional)

TOTAL this device (last page this line number only)

POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S)  
ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE  
(2 U.S.C. 441a(d))  
(Supporting Line 24, FEC Form 3)

Page 1 of 12  
For Line 24, FEC Form 3

(To be used only by Political Committees in the General Election)

Name of Political Committee in Full

National Republican Senatorial Committee-Expenditures

Has your Committee been designated to make coordinated expenditures by a political party committee?  YES  NO  
If YES, name the designating committee: Republican National and/or Respective State Committees

Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Dialcom, Inc. 1104 Spring Street Silver Spring, Maryland 20910	Armstrong Campaign Committee Colorado	Computer services	9-13-78	\$ 1,31 <sup>✓</sup>
Aggregate General Election Expenditure for this Candidate - \$ 84000				
Binns & Associates c/o Byron Nelson 2013 Cedar Springs Road Dallas, Texas 75201	Armstrong Campaign Committee Colorado	Printing services	9-13-78	6,00 <sup>✓</sup>
Aggregate General Election Expenditure for this Candidate - \$ 84000				
National Direct Mail Services, Inc. Suite #400 2233 Wisconsin Ave., N.W. Washington, D.C. 20007	Armstrong Campaign Committee Colorado	Direct Mail service	9-13-78	7,60 <sup>✓</sup>
Aggregate General Election Expenditure for this Candidate - \$ 84000				
Armstrong Campaign Committee 5680 S. Syracuse Circle Place South Building Englewood, Colo. 80264	Bill Armstrong U. S. Senate Colorado	Sec. 441 Contribution	9-13-78	15,00 <sup>✓</sup>
Aggregate General Election Expenditure for this Candidate - \$ 84000				
Humphrey for Senate P. O. Box 28 Concord, New Hampshire 03301	Gordon Humphrey U. S. Senate New Hampshire	Sec. 441 Contribution	9-13-78	10,0 <sup>✓</sup>
Aggregate General Election Expenditure for this Candidate - \$ 15700				

SUBTOTAL of expenditures this page (addition) \$  
TOTAL for period (last page this line number only) \$

Election Commission  
 Street, N.W.  
 Wash, D.C. 20463

ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE  
 (2 U.S.C. 441a(d))  
 (Supporting Line 24, FEC Form 3)

File Line 24, FEC Form 3

(To be used only by Political Committees in the General Election)

Name of Political Committee in Full

National Republican Senatorial Committee-Expenditures

Has your Committee been designated to make coordinated expenditures by a political party committee?  YES  NO  
 If YES, name the designating committee: Republican National and/or Respective State Committees

Full Name, Mailing Address and ZIP Code of Each Payer	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Baxter for Senate Suite #62 Independence Mall Wilmington, Delaware 19803	Jim Baxter U. S. Senate Delaware	Sec. 441 Contribution	9-13-78	\$ 5,000 ✓
Aggregate General Election Expenditure for this Candidate - \$ <u>45,600</u>				
R. J. Sann & Associates 630 9th Avenue New York, New York 10036	Kansans for Kassebaum Kansas	Media Advertising	9-16-78	15,0 ✓
Aggregate General Election Expenditure for this Candidate - \$ <u>182,461.8</u>				
Wendt Advertising P. O. Box 2128 Great Falls, Montana 59403	Williams for Senate Montana	Media Advertising	9-16-78	6,4 ✓
Aggregate General Election Expenditure for this Candidate - \$ <u>16,450</u>				
Smith and Harroff, Inc. 922 Pennsylvania Ave., SE Washington, D.C. 20003	Cohen for Senator Maine	Film Production	9-19-78	9,4 ✓
Aggregate General Election Expenditure for this Candidate - \$ <u>25,617.15</u>				
Northwest Teleproductions Inc. 4435 West 77th St. Minneapolis, Minnesota 55435	Durenberger for Senate Minnesota	Media Advertising	9-19-78	3, ✓
Aggregate General Election Expenditure for this Candidate - \$ <u>6,917.30</u>				

SUBTOTAL of expenditures this page (addition) \$

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

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ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE  
 (U.S.C. 2041a(d))  
 (Supporting Line 14, F.E.C. Form 3)

(To be used only by Political Committees in the General Election)

Name of Political Committee in Full				
National Republican Senatorial Committee-Expenditures				
Has your Committee been designated to make coordinated expenditures by a political party committee? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO				
If YES, name the designating committee: Republican National and/or Respective State Committees				
Full Name, Mailing Address and ZIP Code of Each Payer	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Daniels & Associates 402 Office Park Drive Suite #110 Birmingham, Alabama 35223	Martin for U.S. Senate Alabama	Media Advertising	9-19-78	\$ 25,00 <sup>✓</sup>
Aggregate General Election Expenditure for this Candidate - \$ 56,200				
Northwest Bell Telephone Company 1432 Soo line Building Minneapolis, Minnesota 55402	Durenberger for Senate Minnesota	Telephone service	9-19-78	3,50 <sup>✓</sup>
Aggregate General Election Expenditure for this Candidate - \$ 68,057.30				
Shasteen for Senate 820 South 13th Street Lincoln, Nebraska 68508	Don Shasteen U.S. Senate Nebraska	Sec. 441 Contribution	9-20-78	6,0 <sup>✓</sup>
Aggregate General Election Expenditure for this Candidate - \$ 58,401.30				
Paul F. Overgaard Greenbriar Apartments 10401 S. Cedar Lake Rd. Minnetonka, Minnesota 55343	Durenberger for Senate Minnesota	Political Consulting	9-20-78	1,5 <sup>✓</sup>
Aggregate General Election Expenditure for this Candidate - \$ 63,957.80				
Thomas F. Horner Apt. #307 6300 York Ave., South Edina, Minnesota 55435	Durenberger for Senate Minnesota	Political Consulting	9-20-78	1, <sup>✓</sup>
Aggregate General Election Expenditure for this Candidate - \$ 64,957.80				

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ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE  
 (2 U.S.C. 451a(d))  
 (Supporting Line 24, FEC Form 37)

(To be used only by Political Committees in the General Election)

Name of Political Committee in Full

National Republican Senatorial Committee-Expenditures

Has your Committee been designated to make coordinated expenditures by a political party committee?  YES  NO  
 If YES, name the designating committee: Republican National and/or Respective State Committees

Full Name, Mailing Address and ZIP Code of Each Payer	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Southtown Office Park 8120 Penn Avenue, South Bloomington, Minnesota 55431	Durenberger for Senate Minnesota	Rental - office Space	9-20-78	\$ 1,600
Aggregate General Election Expenditure for this Candidate - \$ 68,057.30				
RO Roger Ailes & Associates, Inc. 230 Central Park South New York, New York 10019	Durenberger for Senate Minnesota	Media Consulting	9-20-78	9,500
Aggregate General Election Expenditure for this Candidate - \$ 68,057.30				
Charles R. Geer, Jr. 6004 N. 19th Street Arlington, Virginia 22205	Durenberger for Senate Minnesota	Photographic Services	9-20-78	2,000
Aggregate General Election Expenditure for this Candidate - \$ 68,057.30				
Lee Califf 1802 Hackamore Lane Alexandria, Virginia 22308	Warner for U.S. Senate Virginia	Political Consultant	9-20-78	900
Aggregate General Election Expenditure for this Candidate - \$ 37,855				
William Holt Kling 1013 26 Street, South Arlington, Virginia 22202	Warner for U.S. Senate Virginia	Political Consultant	9-20-78	2,000
Aggregate General Election Expenditure for this Candidate - \$ 37,855				

SUBTOTAL of expenditures this page (add lines 7-11) \$

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



POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S)  
 ON BEHALF OF CANDIDATE FOR FEDERAL OFFICE  
 (2 U.S.C. 441a(d))  
 (Supporting Line 24, FEC Form 3)

(To be used only by Political Committees in the General Election)

Name of Political Committee in Full

National Republican Senatorial Committee-Expenditures

Has your Committee been designated to make coordinated expenditures by a political party committee?  YES  NO  
 If YES, name the designating committee: Republican National and/or Respective State Committees

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Full Name, Mailing Address and ZIP Code of Each Payer	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
John F. Buckley 2662 Glengyle Drive Vienna, Virginia 22180	Warner for U.S. Senate Virginia	Political	9-20-78	\$ 900
Aggregate General Election Expenditure for this Candidate - \$ 37,858				
UPI, Inc. Attn: Richard Ross 20 Ashburton Place Boston, Massachusetts 02108	Cohen for Senator Maine	Wire Service	9-20-78	72
Aggregate General Election Expenditure for this Candidate - \$ 25,647.15				
ESD & Company, Inc. 4050 - 41st St., North Arlington, VA 22207	Warner for U.S. Senate - Virginia	Design and preparation of Flyers	9-21-78	30,0
Aggregate General Election Expenditure for this Candidate - \$ 37,858				
Decision Making Information Suite#800 2700 N. Main Street Santa Ana, CA 92701	Pressler for Senate South Dakota	Folling	9-21-78	4,
Aggregate General Election Expenditure for this Candidate - \$ 7,260				
Illinois Bell Telephone Attn. Mr. Deitch 225 West Randolph St. HQ-193 Chicago, Illinois 60606	Citizens for Percy Illinois	Telephone Service	9-22-78	1,
Aggregate General Election Expenditure for this Candidate - \$ 41,673.41				

ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE  
(P.U.S. 441a(d))  
(Supporting Line 24, FEC Form 3)

Form 24, FEC Form 3

(To be used only by Political Committees in the General Election)

Name of Political Committee in Full

National Republican Senatorial Committee-Expenditures

Has your Committee been designated to make coordinated expenditures by a political party committee?  YES  NO  
If YES, name the designating committee: Republican National and/or Respective State Committees

Full Name, Mailing Address and ZIP Code of Each Payer	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
---	--	----------------------------	-------------------------	--------

Midwest Film Company  
804 S. Phillips Ave.  
Sioux Falls, South Dakota  
57104

Pressler for Senate  
South Dakota

Film Production

9-22-78

\$ 50

Aggregate General Election Expenditure for this Candidate - \$ 7500

Full Name, Mailing Address and ZIP Code of Each Payer	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
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Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
--	----------------------------	-------------------------	--------

2  
1  
3  
2  
9  
0  
0  
9  
0  
0  
3  
7  
Communications Corporation  
of America  
#1 Direct Marketing Plaza  
Boston, VA 22713

People for Boschwitz  
Minnesota

Direct Mail  
Services

9-22-78

16

Aggregate General Election Expenditure for this Candidate - \$ 40,730

Full Name, Mailing Address and ZIP Code of Each Payer	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
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Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
--	----------------------------	-------------------------	--------

Wiland & Associates  
219 East Davis St.  
Culpeper, VA 22701

Committee for  
Senator Griffin  
Michigan

Direct Mail  
Services

9-27-78

10,0

Aggregate General Election Expenditure for this Candidate - \$ 152,050.93

Full Name, Mailing Address and ZIP Code of Each Payer	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
---	--	----------------------------	-------------------------	--------

Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
--	----------------------------	-------------------------	--------

Diversified Mail  
Marketing  
809 Cameron Street  
Alexandria, VA 22314

Committee for  
Senator Griffin  
Michigan

Direct Mail  
Services

9-27-78

5,0

Aggregate General Election Expenditure for this Candidate - \$ 152,050.93

Full Name, Mailing Address and ZIP Code of Each Payer	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
---	--	----------------------------	-------------------------	--------

Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
--	----------------------------	-------------------------	--------

Minnesota Datasystems, Inc.  
750 North Arn Drive  
Mount, Minnesota 55364

Durenberger for Senate  
Minnesota

Computer services

9-27-78

60

Aggregate General Election Expenditure for this Candidate - \$ 152,050.93

SUBTOTAL of expenditures (this page, including)

TOTAL (this series lists page this line number only)

\$  
\$

POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S)  
 ON BEHALF OF CANDIDATE FOR FEDERAL OFFICE  
 (2 U.S.C. 441a(d))  
 (Supporting Line 24, FEC Form 3)

(To be used only by Political Committees in the General Election)

Name of Political Committee in Full				
National Republican Senatorial Committee-Expenditures				
Has your Committee been designated to make coordinated expenditures by a political party committee? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO				
If YES, name the designating committee: Republican National and/or Respective State Committees				
Full Name, Mailing Address and ZIP Code of Each Payer	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Barre/Lawrence Associates Inc. P. O. Box 485 Alexandria, VA 22313	Warner for U.S. Senate Virginia	Political Consulting & Management Services	9-22-78	\$ 500 ✓
Aggregate General Election Expenditure for this Candidate - \$ 37,838				
Full Name, Mailing Address and ZIP Code of Each Payer	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Automated Business Mail 5515 Livingston Rd., S.E. Washington, D.C. 20021	Kansans for Kassebaum Kansas	Typing services	9-25-78	552 ✓
Aggregate General Election Expenditure for this Candidate - \$ 18,296.18				
Full Name, Mailing Address and ZIP Code of Each Payer	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
American Mailing List 7777 Leesburg Pike Falls Church, Virginia 22043	Citizens for Cochran Mississippi	Direct Mail Services	9-25-78	1,875 ✓
Aggregate General Election Expenditure for this Candidate - \$ 11,477				
Full Name, Mailing Address and ZIP Code of Each Payer	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Smith and Harroff, Inc. 922 Pennsylvania Ave., SE Washington, D.C. 20003	Cohen for Senator Maine	Film production	9-25-78	7,500 ✓
Aggregate General Election Expenditure for this Candidate - \$ 256,474.15				
Full Name, Mailing Address and ZIP Code of Each Payer	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Staley & Fox, Inc. 550 Third Avenue New York, New York 10022	Committee for Senator Griffin Michigan	Media Advertising	9-27-78	40,000 ✓
Aggregate General Election Expenditure for this Candidate - \$ 159,600.43				

ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE

(5 U.S.C. 441a(d))

(Supporting Line 24, FEC Form 3)

For Line 24, FEC Form 3

(To be used only by Political Committees in the General Election)

Name of Political Committee in Full

National Republican Senatorial Committee-Expenditures

Has your Committee been designated to make coordinated expenditures by a political party committee?  YES  NO

If YES, name the designating committee: Republican National and/or respective State Committee

Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Institutional Sales, Inc. 2295 University Ave. St. Paul, Minnesota 55114	Durenberger for Senate Minnesota	Office furnishings	9-27-78	\$ 338
Aggregate General Election Expenditure for this Candidate - \$ 6887.30				
4 Meyers & Associates, Inc. 12101 - 12th Ave., South Burnsville, Minnesota 55337	Durenberger for Senate Minnesota	Printing services	9-27-78	1,640
Aggregate General Election Expenditure for this Candidate - \$ 6887.30				
5 Roger Ailes & Associates 230 Central Park South New York, New York 10019	Durenberger for Senate Minnesota	Media Consulting	9-27-78	11,000
Aggregate General Election Expenditure for this Candidate - \$ 6887.30				
7 Wendt Advertising P. O. Box 2128 Great Falls, Montana 59403	Williams for Senate Montana	Media Advertising	9-27-78	25,000
Aggregate General Election Expenditure for this Candidate - \$ 16,450				
Envelopes Unlimited, Inc. 549 N. Horners Lane Rockville, MD 20850	Citizens for Cochran Mississippi	Envelope Stock	9-27-78	549
Aggregate General Election Expenditure for this Candidate - \$ 16,450				

TOTAL of expenditures this page (addition)

\$

TOTAL this period (last page this line number only)

\$



OPTIONAL FORM FOR COMMITTEES ON DESIGNATED AGENT(S)  
ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE  
(2 U.S.C. 441a(d))  
(Supporting Line 24, FEC Form 3)

(To be used only by Political Committees in the General Election)

Name of Political Committee in Full

National Republican Senatorial Committee-Expenditures

Has your Committee been designated to make coordinated expenditures by a political party committee?  YES  NO  
If YES, name the designating committee: Republican National and/or respective State Committee

Full Name, Mailing Address and ZIP Code of Each Payer	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Envelopes Unlimited, Inc. 649 N. Horners Lane Rockville, MD 20850	Kansans for Kassebaum Kansas	Envelope Stock	9-27-78	\$ 438 ✓
Aggregate General Election Expenditure for this Candidate - \$ <u>5296.18</u>				
DL Printing, Inc. P.O. Box 8090 Southwest Station Washington, D.C. 20024	Armstrong Campaign Committee Colorado	Printing services	9-27-78	507 ✓
Aggregate General Election Expenditure for this Candidate - \$ <u>5400.1</u>				
RMH Research, Inc. 889 Franklin Turnpike Ridgewood, New Jersey 07450	Bell for Senate Committee - New Jersey	Voter Study	9-27-78	1,25 ✓
Aggregate General Election Expenditure for this Candidate - \$ <u>29750</u>				
The Robert Goodman Agency 12 West Read Street Baltimore, MD 21201	Committee for Senator Griffin Michigan	Media Consultant	9-27-78	18,00 ✓
Aggregate General Election Expenditure for this Candidate - \$ <u>152000.00</u>				
Roger Ailes & Associates 230 Central Park South New York, N.Y. 10019	Durenberger for Senate Minnesota	Media Consultant	9-27-78	6,00 ✓
Aggregate General Election Expenditure for this Candidate - \$ <u>68000.30</u>				

TOTAL of expenditures this date (circle) \$

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

POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S)  
 ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE  
 (2 U.S.C. 441a(d))  
 (Supporting Line 24, FEC Form 3)

Page 21 of 21  
 For Line 24, FEC Form 3

(To be used only by Political Committees in the General Election)

Name of Political Committee in Full

National Republican Senatorial Committee - Expenditures

Has your Committee been designated to make coordinated expenditures by a political party committee?  YES  NO  
 If YES, name the designating committee: Republican National and/or respective State Committee

Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Robert R. Dahlgren 3312 N Street, N. W. Washington, D.C. 20007	Brooke Committee Massachusetts	Political Consultant	9-28-78	\$ 1,450
Aggregate General Election Expenditure for this Candidate - \$21,652.93				
Headon Printing Services 23 N. St. Asaph St. Alexandria, Virginia 22314	Warner for Senate Committee Virginia	Printing Services	9-28-78	2,990
Aggregate General Election Expenditure for this Candidate - \$37,355				
Southern Bell Telephone P. O. Box 686 Columbia, S. C. 29215	Re-Elect Thurmond Committee South Carolina	Telephone Services	9-28-78	5,410
Aggregate General Election Expenditure for this Candidate - \$21,246.39				
The Keenan Company Keenan Building 1310 Lady Street Columbia, S. C. 29211	Re-Elect Thurmond Committee South Carolina	Rental - Office Space	9-28-78	470
Aggregate General Election Expenditure for this Candidate - \$21,246.39				
Mailmax Suite 122, Interstate Center Office Bldg. 16 Berry Hill Road Columbia, S. C. 29210	Re-Elect Thurmond Committee South Carolina	Mailing Service	9-28-78	150
Aggregate General Election Expenditure for this Candidate - \$21,246.39				

SUBTOTAL of expenditures this page (optional):

\$

TOTAL this period (last page this line number only):

\$

Election Commission  
 Street, No. 3  
 W. D. C. 20543

POLITICAL PARTY COMMITTEES OR DESIGNATED AGENTS  
 ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE  
 (2 U.S.C. 441a(d))  
 (Supporting Line 24, FEC Form 3)

Page 1 of 1  
 For Line 24, FEC Form 3

(To be used only by Political Committees in the General Election)

Name of Political Committee in Full

National Republican Senatorial Committee - Expenditures

Has your Committee been designated to make coordinated expenditures by a political party committee?  YES  NO  
 If YES, name the designating committee: Republican National and/or respective State Committee

Full Name, Mailing Address and ZIP Code of Each Payer	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Arthur J. Finkelstein & Associates 13 Third Street Rye, New York 10580	Re-Elect Thurmond Committee South Carolina	Media Advertising	9-28-78	\$ 2,160
Aggregate General Election Expenditure for this Candidate - \$ 21,246.39				
South Carolina Electric & Gas Co. P. O. Box 764 Columbia, S. C. 29218	Re-Elect Thurmond Committee South Carolina	Utility Services	9-28-78	19
Aggregate General Election Expenditure for this Candidate - \$ 21,246.39				
Theron H. Peace 2508 Sunset Blvd. West Columbia, S. C. 29169	Re-Elect Thurmond Committee South Carolina	Accounting Services	9-28-78	1,470
Aggregate General Election Expenditure for this Candidate - \$ 21,246.39				
South Carolina Legionaire P. O. Box 1451 Columbia, S. C.	Re-Elect Thurmond Committee South Carolina	Newspaper Advertising	9-28-78	42
Aggregate General Election Expenditure for this Candidate - \$ 21,246.39				
South Carolina State Fair P. O. Box 393 Columbia, S. C. 29202	Re-Elect Thurmond Committee South Carolina	Exhibit Space	9-28-78	16
Aggregate General Election Expenditure for this Candidate - \$ 21,246.39				

SUBTOTAL OF EXPENDITURES THIS DATE (SECTION 1)

TOTAL THIS DATE (LINE 24) PER THIS LINE NUMBER ONLY

5  
5

ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE  
 (2 U.S.C. 441a(d))  
 (Supporting Line 24, FEC Form 3)

(To be used only by Political Committees in the General Election)

Name of Political Committee in Full

National Republican Senatorial Committee - Expenditures

Has your Committee been designated to make coordinated expenditures by a political party committee?  YES  NO

If YES, name the designating committee: Republican National and/or respective State Committee

Full Name, Mailing Address and ZIP Code of Each Payer	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Gramling Specialty Advertising Co. 130 Centre Street P. O. Box 461 Orangeburg, S. C. 29115	Re-Elect Thurmond Committee South Carolina	Advertising Services	9-28-78	\$ 1,23
Aggregate General Election Expenditure for this Candidate - \$ 21,246.39				
Photo Vision 1117 Gladden Street Columbia, S. C. 29205	Re-Elect Thurmond Committee South Carolina	Film Production	9-28-78	4
Aggregate General Election Expenditure for this Candidate - \$ 21,246.39				
Cromers P-Nuts P. O. Box 163 Columbia, S. C. 29202	Re-Elect Thurmond Committee South Carolina	Novelties	9-28-78	12
Aggregate General Election Expenditure for this Candidate - \$ 21,246.39				
Souvenir Program Committee S. C. State College P. O. Box 1705 Orangeburg, S. C. 29117	Re-Elect Thurmond Committee South Carolina	Advertising Services	9-28-78	15
Aggregate General Election Expenditure for this Candidate - \$ 21,246.39				
IBM Corporation P. O. Box 1981 Atlanta, Georgia 30301	Re-Elect Thurmond Committee South Carolina	Typewriter	9-28-78	50
Aggregate General Election Expenditure for this Candidate - \$ 21,246.39				

SUBTOTAL of expenditures this over section: \$

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



ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE  
 (2 U.S.C. 441a(d))  
 (Supporting Line 24, FEC Form 3)

(To be used only by Political Committees in the General Election)

Name of Political Committee in Full

National Republican Senatorial Committee - Expenditures

Has your Committee been designated to make coordinated expenditures by a political party committee?  YES  NO  
 If YES, name the designating committee: Republican National and/or respective State Committee

Full Name, Mailing Address and ZIP Code of Each Payer	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
The Star 106 E. Buena Vista Avenue N. Augusta, S. C. 29841	Re-Elect Thurmond Committee South Carolina	Printing Services	9-28-78	\$ 373
Aggregate General Election Expenditure for this Candidate - \$21,246.39				
Columbia Office Supply Company 1112 Lady Street P. O. Box 327 Columbia, S. C. 29202	Re-Elect Thurmond Committee South Carolina	Envelope Stock	9-28-78	332
Aggregate General Election Expenditure for this Candidate - \$21,246.39				
Professional Computer Service, Inc. 2650 E. Main Street Spartanburg, S. C. 29303	Re-Elect Thurmond Committee South Carolina	Computer Services	9-28-78	3,336
Aggregate General Election Expenditure for this Candidate - \$21,246.39				
Covington-Quinn-Dicely 1703 Gervais Street Columbia, S. C.	Re-Elect Thurmond Committee South Carolina	Printing Services	9-28-78	2,631
Aggregate General Election Expenditure for this Candidate - \$21,246.39				
Gregory Electric Co. P. O. Drawer 1419 2124 College St. Columbia, S. C.	Re-Elect Thurmond Committee South Carolina	Repairing lights	9-28-78	30
Aggregate General Election Expenditure for this Candidate - \$21,246.39				

TOTAL of expenditures this page (optional)

TOTAL this period last page this line number only

\$

\$

1578  
 FEDERAL COMMUNICATIONS COMMISSION  
 WASHINGTON, D. C. 20540

POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S)  
 ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE  
 (2 U.S.C. 441a(d))  
 (Supporting Line 24, FEC Form 3)

Page 20 of 23  
 For Line 24, FEC Form 3

(To be used only by Political Committees in the General Election)

Name of Political Committee in Full

National Republican Senatorial Committee - Expenditures

Has your Committee been designated to make coordinated expenditures by a political party committee?  YES  NO  
 If YES, name the designating committee: Republican National and/or respective State Committee

Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Pioneer Printing Co. P. O. Box 717 2008 State Street Cayce, S. C. 29033	Re-Elect Thurmond Committee South Carolina	Printing Services	9-28-78	\$ 85
Aggregate General Election Expenditure for this Candidate - \$ 21,246.39				
Action Graphics 532 Knox Abbott Drive Cayce, S. C. 29033	Re-Elect Thurmond Committee South Carolina	Printing Services	9-28-78	43
Aggregate General Election Expenditure for this Candidate - \$ 21,246.39				
Xerox Corporation P. O. Box 36084 M Pittsburgh, Pa. 15250	Re-Elect Thurmond Committee South Carolina	Equipment (Copy Machine)	9-28-78	33
Aggregate General Election Expenditure for this Candidate - \$ 21,246.39				
Select Business Equipment of S. C. P. O. Box 6136 Columbia, S. C. 29260	Re-Elect Thurmond Committee South Carolina	Office Equipment and Supplies	9-28-78	21
Aggregate General Election Expenditure for this Candidate - \$ 21,246.39				
R. L. Bryan Company P. O. Box 368 Columbia, S. C. 29202	Re-Elect Thurmond Committee South Carolina	Printing Services	9-28-78	10
Aggregate General Election Expenditure for this Candidate - \$ 21,246.39				

SUBTOTAL of expenditures this page (optional) \$  
 TOTAL this printed page (this line number only) \$

(To be used only by Political Committees in the General Election)

Name of Political Committee in Full

National Republican Senatorial Committee-Expenditures

Has your Committee been designated to make coordinated expenditures by a political party committee?  YES  NO  
If YES, name the designating committee: Republican National and/or respective State Committee

Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
The Robert Goodman Agency 12 West Read Street Baltimore, MD 21201	Al Simpson for Senate Wyoming	Media Consultant	9-27-78	\$ 15,668. ✓

Aggregate General Election Expenditure for this Candidate - \$ 15,668.38

Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Market Opinion Research 28 West Adams Detroit, Michigan 48226	Brooke Committee Massachusetts	Telephone polling	9-27-78	20,200 ✓

Aggregate General Election Expenditure for this Candidate - \$ 21,652.98

Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Mike Kelly 5680 S. Syracuse Circle Suite #118 Englewood, Colorado 80111	Armstrong Campaign Committee Colorado	Political Consulting	9-29-78	3,000 ✓

Aggregate General Election Expenditure for this Candidate - \$ 840.00

Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
National Direct Mail Services, Inc. Suite #400 2233 Wisconsin Ave., N.W. Washington, D.C. 20007	Armstrong Campaign Committee Colorado	Direct Mail Services	9-29-78	18,321 ✓

Aggregate General Election Expenditure for this Candidate - \$ 340.00

Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Mountain Bell Telephone P. O. Drawer 17-J Denver, Colorado 80217	Armstrong Campaign Committee Colorado	Telephone service	9-29-78	3,070 ✓

Aggregate General Election Expenditure for this Candidate - \$ 540.00

TOTAL of expenditures this page (optional) \$  
TOTAL this period (last page this line number only) \$

(To be used only by Political Committees in the General Election)

Name of Political Committee in Full

National Republican Senatorial Committee - Expenditures

Has your Committee been designated to make coordinated expenditures by a political party committee?  YES  NO  
If YES, name the originating committee: Republican National and/or respective State Committee

Full Name, Mailing Address and ZIP Code of Each Payer	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Tom Horner Suite #164 8120 Penn Ave., South Minneapolis, Mn. 55431	Durenberger for Senate Minnesota	Consulting Services	9-29-78	\$ 3,000.
Aggregate General Election Expenditure for this Candidate - \$ 68087.39				
Northwestern Bell Telephone Co. 1432 Soo Line Bldg. Minneapolis, Mn. 55402	Durenberger for Senate Minnesota	Telephone Services	9-29-78	2,371.
Aggregate General Election Expenditure for this Candidate - \$ 68087.39				
Paul Overgaard Suite #164 8120 Penn Ave., South Minneapolis, Mn. 55431	Durenberger for Senate Minnesota	Consulting Services	9-29-78	4,500.
Aggregate General Election Expenditure for this Candidate - \$ 68087.39				
Market Opinion Research 28 West Adams Detroit, Michigan 48226	Durenberger for Senate Minnesota	Telephoning Poll	9-29-78	8,850
Aggregate General Election Expenditure for this Candidate - \$ 68087.39				
Christopher D. Lord 5401 Westbard Ave. Apt. #1507 Bethesda, Md. 20816	Martin for U. S. Senate Alabama	Consulting Services	9-29-78	200
Aggregate General Election Expenditure for this Candidate - \$ 200.00				

TOTAL of expenditures this page (optional)

TOTAL this period (last page this line number only)



(To be used only by Political Committees in the General Election)

Name of Political Committee in Full

National Republican Senatorial Committee - Expenditures

Has your Committee been designated to make coordinated expenditures by a political party committee?  YES  NO  
If YES, name the designating committee: Republican National and/or respective State Committee

Full Name, Mailing Address and ZIP Code of Each Payer	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Monarch Printing Corporation 1130 West Adams St. Chicago, Illinois 60607	Citizens for Percy Illinois	Printing Services	9-29-78	\$ 4,170.
Aggregate General Election Expenditure for this Candidate - \$ 41626.41				
Olga V. Simpson Suite #308-A 901 6th St., S. W. Washington, D. C. 20024	Citizens for Percy Illinois	Consulting Services	9-29-78	1,000.
Aggregate General Election Expenditure for this Candidate - \$ 41626.41				
National Direct Mail Services, Inc. Suite #400 2233 Wisconsin Ave. Washington, D. C. 20007	Citizens for Percy Illinois	Direct Mail Services	9-29-78	800.
Aggregate General Election Expenditure for this Candidate - \$ 41626.41				
Staley & Fox, Inc. 850 Third Avenue New York, New York 10022	Committee for Senator Griffin Michigan	Media Advertising	9-29-78	21,988.
Aggregate General Election Expenditure for this Candidate - \$ 15,200.73				
Staley & Fox, Inc. 850 Third Avenue New York, New York 10022	Committee for Senator Griffin Michigan	Media Advertising	9-29-78	11,283.
Aggregate General Election Expenditure for this Candidate - \$ 15,200.73				

(To be used only by Political Committees in the General Election)

Name of Political Committee in Full

National Republican Senatorial Committee - Expenditures

Has your Committee been designated to make coordinated expenditures by a political party committee?  YES  NO  
If YES, name the designating committee: Republican National and/or respective State Committee

Full Name, Mailing Address and ZIP Code of Each Payer	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Bruce Hildebrand 192 Twiggs Corner Peachtree City, Ga. 30269	Bell for Senate Committee New Jersey	Consulting Services	9-29-78	\$ 1,000.
Aggregate General Election Expenditure for this Candidate - \$ 1,750.				
Market Opinion Research 28 West Adams Detroit, Michigan 48226	Humphrey for Senate New Hampshire	Poll Services	9-29-78	200
Aggregate General Election Expenditure for this Candidate - \$ 15,200.				
Abbot Walton & Associates Executive Building 624 Douglas Street Omaha, Nebraska 68102	Shasteen for Senate Nebraska	Advertising Services	9-29-78	2,840
Aggregate General Election Expenditure for this Candidate - \$ 5840.13				
Aggregate General Election Expenditure for this Candidate - \$				

TOTAL of expenditures this page (optional) \$

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

ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE  
 (2 U.S.C. 441a(d))  
 (Supporting Line 24, FEC Form 3)

(To be used only by Political Committees in the General Election)

Name of Political Committee in Full

National Republican Senatorial Committee-Expenditures

Has your Committee been designated to make coordinated expenditures by a political party committee?  YES  NO  
 If YES, name the designating committee: Republican National and/or respective State Committee

Full Name, Mailing Address and ZIP Code of Each Payer	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
American Express Company 111 N. State St. Chicago, Illinois 60606	Citizens for Percy Illinois	Miscellaneous Charges	9-22-78	\$ 724.
Aggregate General Election Expenditure for this Candidate - \$ 41676.41				
Avis Rent A Car 501 N. Dearborn St. Chicago, Illinois 60601	Citizens for Percy Illinois	Car Rental	9-22-78	763.
Aggregate General Election Expenditure for this Candidate - \$ 41676.41				
Wailey, Deardourff & Assocs. Suite #1120 933 - 15th St., N. W. Washington, D.C. 20005	Citizens for Percy Illinois	Media Advertising	9-22-78	7,500.00
Aggregate General Election Expenditure for this Candidate - \$ 41676.41				
Budget Quick Print 507 W. Jackson Blvd. Chicago, Illinois 60606	Citizens for Percy Illinois	Printing services	9-22-78	550.
Aggregate General Election Expenditure for this Candidate - \$ 41676.41				
Clark Aviation, Inc. Bloomington-Normal Airport Bloomington, Illinois 61701	Citizens for Percy Illinois	Charter service	9-22-78	616.00
Aggregate General Election Expenditure for this Candidate - \$ 41676.41				

SUBTOTAL of expenditures this page (optional): \$

TOTAL this period (last date this line number prints): \$

(To be used only by Political Committee in the General Election)

Name of Political Committee in Full

National Republican Senatorial Committee-Expenditures

Has your Committee been designated to make coordinated expenditures by a political party committee?  YES  NO  
 If YES, name the designating committee: Republican National and/or Respective State Committee

Full Name, Mailing Address and ZIP Code of Each Payer	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Lambert Field Airport P.O. Box 10014 St. Louis, Missouri 63145	Citizens for Percy Illinois	Charter service	9-22-78	\$ 452.38
Aggregate General Election Expenditure for this Candidate - \$ 41626.41				
Full Name, Mailing Address and ZIP Code of Each Payer	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
The Racquet Club of Chicago 365 N. Dearborn Pkwy. Chicago, Illinois 60610	Citizens for Percy Illinois	Reception	9-22-78	776.26
Aggregate General Election Expenditure for this Candidate - \$ 41626.41				
Full Name, Mailing Address and ZIP Code of Each Payer	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Utility Stationery Room 704 36 S. Wabash Chicago, Illinois 60603	Citizens for Percy Illinois	Office supplies	9-22-78	416.42
Aggregate General Election Expenditure for this Candidate - \$ 41626.41				
Full Name, Mailing Address and ZIP Code of Each Payer	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Monarch Printing Corp. Room 704 36 S. Wabash Chicago, Illinois 60607	Citizens for Percy Illinois	Printing services	9-22-78	1,885.00
Aggregate General Election Expenditure for this Candidate - \$ 41626.41				
Full Name, Mailing Address and ZIP Code of Each Payer	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Xerox Corporation P. O. Box 96300 Chicago, Illinois 60693	Citizens for Percy Illinois	Typewriter rental	9-22-78	1,078.25
Aggregate General Election Expenditure for this Candidate - \$ 41626.41				

TOTAL of expenditures this page (optional)

TOTAL this period (last page this line number only)





Telecon:

Dug Greevy with Rodney Smith  
National Republican Senatorial Committee-Expenditures  
2/28/79

RFAI's were sent to the committee for the M10 and 10G reports. Response was received 2/22/79 (By the Clerk of the Senate) to these requests. As I had some questions regarding the response, I phoned Smith for clarification.

October 20 Monthly

A Paragraph 1--No problems

B Paragraph 2--Schedule B provided was for the 10G report, not for the M10.  
Smith stated this was an oversight, and that it would be corrected.

C Paragraph 3--I informed Smith that, with two exceptions, each of the entries noted in the RFAI were reported as in-kind contributions on Line 22(c) on the original report, and that they were reported as coordinated expenditures in the response filed.

- The exceptions:
1. Durenberger support (\$2,090.05) had not appeared in the original report under either Line 22(c) or Line 24.
  2. Durenberger support (\$8,929.80) appeared in the original report as an in-kind contribution to Cochran, and not Durenberger.

Smith stated that he had been unclear where he should report 441a(d) expenditures, when the amount of support was a portion of an expenditure made and reported on Line 20. He said that the entries on Line 20, in the original report, were the same entries which were made on Line 22(c), in the original report.

He did state however, that entries were made on Line 22(c) which should have been reported on Line 24, i.e. the committee reported as in-kind contributions several expenditures which were actually coordinated. I informed him that in those instances in which the committee needed to report expenditures as 441a(d) and the expenditures were reported under Line 20, the committee should report the expenditures as memo entries on Schedule F. By so doing, the cash summary figures would not be inflated.

Regarding the exceptions, Smith stated that the \$2,090 was a 441a(d) expenditure on behalf of Durenberger, and that the \$8,929 was a 441a(d) expenditure on behalf of Cochran. Amendments would be submitted on these.

10 Day Pre-General

? E, F, H, I Only problem was with Paragraph 4

G Paragraph 4--The committee had in the original report reported these entries on 22(c), and in the response, reported them on Line 24, referring to the expenditures variously as, "In-kind contributions," "In-Kind Expenditures," and "Allocated Expenditures."

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Telecon  
Page Two

I once again informed Smith that Line 22(c) is to be used for the reporting of in-kind contributions and that Line 24 is to be used for the reporting of coordinated expenditures.

It is apparent then that the committee has reported on Line 22(c) expenditures which should have been reported on Line 24. Smith stated that he would go through each of his reports, and reanalyze all entries made on Line 22(c). He will submit amendments as necessary.

I stated that I believed the trouble began with the September 20 Monthly. There is an RFAI still outstanding on this report, and that RFAI concerns problems with Line 22(c).

Finally, Smith stated that after the election they had auditors go through the committee's records and reports to assure that there was full disclosure and that no limitations had been exceeded. He stated that the auditors' report indicated that there had been full disclosure and that no limitations had been exceeded.

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1528  
 Election Commission  
 Street, N.W.  
 Washington, D.C. 20403

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

Line Number \_\_\_\_\_  
 (Use separate Schedules for  
 each numbered line)

Name of Candidate or Committee in Full

National Republican Senatorial Committee

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Martin For U. S. Senate P. O. Box 3406 Birmingham, Alabama 35205	Sec. 441 Contribution  Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	10-6-78	\$17,000.00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure  Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure  Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure  Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure  Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure  Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure  Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure  Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period

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SUBTOTAL of expenditures this page (optional)

\$17,000.00

TOTAL this period (list page this line number only)

\$17,000.00





FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO: CHARLES STEELE  
FROM: MARJORIE W. EMMONS *MWE*  
DATE: FEBRUARY 6, 1979  
SUBJECT: MUR 820 - Interim Investigative Report  
dated 1-31-79: Signed by GC 2-2-79;  
Received in OCS Friday, 2-2-79, 5:06

The above-named document was circulated to the Commission on a 24-hour no-objection basis at 12:00, Monday, February 5, 1979.

There were no objections to the Interim Investigative Report.

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February 2, 1979

MEMORANDUM TO: Marge Emmons  
FROM: Elissa T. Garr  
SUBJECT: MUR 820

Please have the attached Interim Invest Report on  
MUR 820 distributed to the Commission.

Thank you.

70040152605

BEFORE THE FEDERAL ELECTION COMMISSION  
January 31, 1979

RECEIVED  
OFFICE OF THE  
COMMISSION SECRETARY

79 FEB 2 P 5: 06

In the Matter of )  
 )  
National Republican ) MUR 820  
Senatorial Committee )

INTERIM INVESTIGATIVE REPORT

On January 10, 1979, the National Republican Senatorial Committee submitted their reply to our reason to believe notification letter. We are currently reviewing the response and analyzing the facts in this matter. We have also requested the Reports Analysis Division to review certain reports involved in this matter to assist in our investigation. A full report will follow.

2/2/79  
Date

William C. Oldaker  
General Counsel

79040152607

file  
820

January 31, 1979

MEMORANDUM

TO: Tom Haselhorst

THROUGH: Orlando B. Potter  
William C. Oldaker

FROM: Kathy Perkins *Perkins*

SUBJECT: Reports Analysis Review of the Jim Martin for  
Senate Committee S<sub>1</sub> and S<sub>2</sub>

The Office of the General Counsel is currently conducting an investigation which involves the Jim Martin for Senate Committee S<sub>1</sub> and S<sub>2</sub>. We request the Reports Analysis Division to do an expedited analysis of their reports to assist in the Commission's handling of this matter. We are particularly concerned with the transfers of funds between the two committees which took place on or around the 2 of October, 1978.

If you have any questions, please contact Kathy Perkins at 34060 or Judy Thedford at 34057.

79040152608



QC #  
9061

LAW OFFICES

JENKINS, NYSTROM & STERLACCI, P.C.

MERLE R. JENKINS  
DENNIS H. NYSTROM  
MICHAEL A. STERLACCI  
CARL F. SCHIER  
JOSEPH E. JANNETTA  
JAMES F. SCHOENER  
STEPHEN J. HITCHCOCK  
CHRIS M. PARFITT  
GARY J. NYSTROM  
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2033 M STREET, N.W.  
WASHINGTON, D. C. 20036  
  
(202) 293-2505

OF COUNSEL  
JOHN B. CONLAN  
EDWARD A. RYDER

MICHIGAN OFFICE  
15999 WEST TWELVE MILE ROAD  
SOUTHFIELD, MICHIGAN 48076  
(313) 559-2826

January 10, 1979

Kathleen Imig Perkins, Esq.  
Office of General Counsel  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

000207

Re: M U R 820

Dear Ms. Perkins:

Enclosed you will find the affidavit of Mr. Rodney A. Smith, treasurer of the National Republican Senatorial Committee concerning expenditures and contributions to the two Martin for Senate Committees. As is apparent from the last part of the affidavit, Mr. Martin resigned from his candidacy for the Senate seat of retiring Senator John Sparkman (Class 2, United States Senate) in October 1978, and was thereafter nominated to run for the seat left vacant by the untimely death of Senator James Allen of Alabama (Class 3, United States Senate). A similar situation had previously occurred in Minnesota and Advisory Opinion 1978-19 to Congressman Fraser was studiously followed to give direction for such a change in candidacy.

The affidavit should show our compliance with the requirements of that Advisory Opinion and I attach hereto copies of assignment and allocation agreements of the National and State Party committees authorizing our acting as their agent in each of these campaign committees.

I will be glad to furnish any further information or documentation needed to indicate our compliance in this matter, and ask that before any further action is taken that we be given an opportunity for a conference or answer further questions in writing.

Respectfully,

*James F. Schoener*  
James F. Schoener

JFS:cel

Enclosures

P.S. I also enclose a copy of the review by Stan Huckaby, the C.P.A. who checked the items mentioned in the Rodney Smith affidavit.

79040152609



Republican  
National  
Committee

Bill Brock  
Chairman

The Honorable Bob Packwood, Chairman  
National Republican Senatorial Committee  
227 Massachusetts Avenue, NE  
Washington, D. C. 20002

Dear Bob:

By this letter the Republican National Committee authorizes the National Republican Senatorial Committee to serve as the agent of the Republican National Committee, for the purpose of making expenditures pursuant to 2 USC S441a(d)(3). Your Committee is authorized to make these expenditures, on behalf of general election campaign of Senate Seat #2.

Under S441a(d)(3) you may spend, on the Republican National Committee's behalf, up to \$60,000 for Mr. James Martin, of Alabama .

Best personal regards.

Very truly yours,

BILL BROCK

BB/bnp

cc: Bob Moore  
Ben Cotten  
Charlie Black  
Jacquie Nystrom  
Jay Banning  
Kenny Klinge

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Republican  
National  
Committee

September 5, 1978

The Honorable Bob Packwood, Chairman  
National Republican Senatorial Committee  
227 Massachusetts Avenue, NE  
Washington, D. C. 20002

Dear Bob:

By this letter the Republican National Committee authorizes the National Republican Senatorial Committee to serve as the agent of the Republican National Committee, for the purpose of making expenditures pursuant to 2 USC S441a (d) (3). Your Committee is authorized to make these expenditures, on behalf of the Republican National Committee, in connection with the general election campaign of James Martin of Alabama.

Under S441a (d) (3) you may spend, on the Republican National Committee's behalf, up to \$10,000 for Mr. Martin.

Best personal regards.

Very truly yours,

  
BILL BROCK

BB/bnp

cc: Bob Moore  
Ben Cotten  
Charlie Black  
Jacquie Nystrom  
Matt Wirgau  
Jay Banning



# Republican National Committee

William D. Harris, State Chairman  
Member for Alabama  
P.O. Box 3315  
Birmingham, Alabama 35205  
(205) 322-5733

## AGREEMENT BETWEEN THE NATIONAL REPUBLICAN SENATORIAL COMMITTEE AND THE ALABAMA REPUBLICAN EXECUTIVE COMMITTEE

The National Republican Senatorial Committee, hereinafter known as "Senatorial", agrees with the Alabama Republican Executive Committee, hereinafter known as "State"; as follows:

1. Under the provision of 441 a(d) (3) of Title 2 of the United States Code, State (and its subordinate committees) may make certain expenditures in connection with the general election campaign of the candidate for the office United States Senator for the State of Alabama.
2. Such amount of allowed expenditures under said provision has been computed tentatively by the Federal Election Commission as the amount of \$62,507.00.
3. That State wishes to designate Senatorial its agent for the purpose of making such expenditures up to the amount of \$60,000.00.
4. State agrees to file an allocation statement concerning the amount not assigned to Senatorial as required by the Federal Election Commission Regulation 110.7(c).
5. State agrees to carry out the provisions of such allocation statement and will promptly advise Senatorial at any time that State and its subordinate committees reach 80% of the amount retained by State and a review of this agreement will occur at such time.
6. Senatorial agrees to make such expenditures in behalf of candidate, or if it is any manner unable to make such expenditures, to promptly release and cancel said agency and reassign such allocated amount to State.

This agreement signed the date opposite the respective parties' name to be effective when signed by both parties.

Dated Aug 22, 1978 1978 at  
Washington, D. C.

National Republican Senatorial Committee

By Rodney A. Smith

Title Treasurer

Dated 10 August 1978 1978 at  
Birmingham, Alabama.

Alabama Republican Executive Committee

By William D. Harris

William D. Harris

Title Chairman

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Republican  
National  
Committee

Bill Brock  
Chairman

The Honorable Bob Packwood, Chairman  
National Republican Senatorial Committee  
227 Massachusetts Avenue, NE  
Washington, D. C. 20002

Dear Bob:

By this letter the Republican National Committee authorizes the National Republican Senatorial Committee to serve as the agent of the Republican National Committee, for the purpose of making expenditures pursuant to 2 USC S441a(d)(3). Your Committee is authorized to make these expenditures, on behalf of the Republican National Committee, in connection with the general election campaign of Senate Seat #2. and is in addition to our letter in the amount of \$60,000.

Under S441a(d)(3) you may spend, on the Republican National Committee's behalf, an additional \$1,000 for Mr. Allen, bringing the cumulative total to \$61,000.

Best personal regards.

Very truly yours,

  
BILL BROCK

BB/bnp

cc: Bob Moore  
Ben Cotten  
Charlie Black  
Jacquie Nystrom  
Jay Banning  
Kenny Klinge

79040152613





# Republican National Committee

William D. Harris, State Chairman  
Member for Alabama  
P.O. Box 3315  
Birmingham, Alabama 35205  
(205) 322-5733

*Original*

## AGREEMENT BETWEEN THE NATIONAL REPUBLICAN SENATORIAL COMMITTEE AND THE ALABAMA REPUBLICAN EXECUTIVE COMMITTEE

The National Republican Senatorial Committee, hereinafter known as "Senatorial", agrees with the Alabama Republican Executive Committee, hereinafter known as "State"; as follows:

1. Under the provision of 441 a(d) (3) of Title 2 of the United States Code, State (and its subordinate committees) may make certain expenditures in connection with the special general election campaign of the candidate for the office United States Senator for the State of Alabama unexpired term Place #2.
2. Such amount of allowed expenditures under said provision has been computed tentatively by the Federal Election Commission as the amount of \$62,507.00.
3. That State wishes to designate Senatorial its agent for the purpose of making such expenditures up to the amount of \$62,000.00
4. State agrees to file an allocation statement concerning the amount not assigned to Senatorial as required by the Federal Election Commission Regulation 110.7(c).
5. State agrees to carry out the provisions of such allocation statement and will promptly advise Senatorial at any time that State and its subordinate committees reach 80% of the amount retained by State and a review of this agreement will occur at such time.
6. Senatorial agrees to make such expenditures in behalf of candidate, or if its in any manner unable to make such expenditures, to promptly release and cancel said agency and reassign such allocated amount to State.

This agreement signed the date opposite the respective parties' name to be effective when signed by both parties.

Dated \_\_\_\_\_ 1978 at  
Washington, D. C.

National Republican Senatorial Committee  
By *[Signature]*  
Title *Treasurer*

Dated \_\_\_\_\_ 1978 at  
Birmingham, Alabama

Alabama Republican Executive Committee  
By *[Signature]*  
Title Chairman

79010152614



Republican  
National  
Committee

Bill Brock  
Chairman

The Honorable Bob Packwood, Chairman  
National Republican Senatorial Committee  
227 Massachusetts Avenue, NE  
Washington, D. C. 20002

Dear Bob:

By this letter the Republican National Committee authorizes the National Republican Senatorial Committee to serve as the agent of the Republican National Committee, for the purpose of making expenditures pursuant to 2 USC S441a(d)(3). Your Committee is authorized to make these expenditures, on behalf of the Republican National Committee, in connection with the general election campaign of Senate Seat 1, Alabama and is in addition to our letter of Sept. 5, 1978, in the amount of \$10,000.

Under S441a(d)(3) you may spend, on the Republican National Committee's behalf, an additional \$52,000 for Mr. Martin, bringing the cumulative total to \$62,000.

Best personal regards.

Very truly yours,

*Bill*  
BILL BROCK

BB/bnp

cc: Bob Moore  
Ben Cotten  
Charlie Black  
Jacquie Nystrom  
Jay Banning

79040152615

# Political Financial Services

901 L'Enfant Plaza Center, S.W.  
Washington, D.C. 20024

(202) 554-2206

Stan Huckaby  
Res: (202) 554-4679

Federal Campaign  
Financial Consulting Services

October 17, 1978

Rod Smith  
National Republican Senatorial Committee  
227 Massachusetts Avenue, NE  
Washington, DC 20002

Dear Rod,

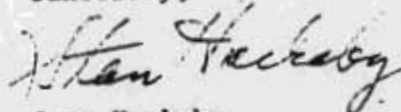
Pursuant to our conversation of last week, I am submitting the following figures to the National Republican Senatorial Committee concerning your limitations on the Jim Martin For Senate Committee.

As you know, Mr. Martin has changed candidacy for election to the United States Senate, and, therefore, under the law, is entering a new election. In accordance with Advisory Opinion 1978-19, we have made an allocation of the "coordinated expenditures" made by the National Republican Senatorial Committee between the first senate race and the second senate race. Of the \$100,000.00 in coordinated expenditures that you have made, \$70,170.55 has been allocated to the first senate campaign, and \$28,458.63 has been allocated to the second campaign. The remaining balance of \$1,370.82 is presently being refunded to you by the vendor. Using A.O. 1978-19, all of your contributions (\$17,500.00 maximum) made to the first senate campaign are non-allocable to the second campaign. Therefore, that limit will begin again. I understand that you have made subsequent contributions to the second senate campaign, and those amounts should be added to the \$28,458.63 in determining the total amount remaining for coordinated expenditures in the second senate campaign. A detailed explanation for this allocation has been telecopied to you by the Jim Martin for Senate Campaign Committee.

All allocations have been made based on the exact amounts of invoices given to us by vendors. Should any of these amounts have a slight variation, we will immediately notify you as to the effects they have on your limitation.

Please feel free to contact me if you have any further questions concerning this matter.

Sincerely,



Stan Huckaby

SH:tmb

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UNITED STATES OF AMERICA  
Before the FEDERAL ELECTION COMMISSION

In the matter of  
NATIONAL REPUBLICAN SENATORIAL COMMITTEE

M.U.R. 820

AFFIDAVIT

City of Washington  
District of Columbia

Rodney A. Smith, being duly sworn deposes and says:

I

That he is the duly appointed treasurer of the National  
Republican Senatorial Committee of 227 Massachusetts Avenue, N.E.,  
Washington, D.C.

II

That as such treasurer he supervised and directed the making of  
contributions as allowed by law to Republican candidates for the office  
of United States Senate in the year 1978.

III

That in such capacity donations of cash (or in-kind) were made to  
James Martin for Senate (Sparkman seat) from July 11 through August 17th,  
1978 in the amount of \$16,493.27 as is shown in our internal records,  
a copy of which is attached as Exhibit A.

79040152617

IV

That in such capacity donations of cash in the amount of \$17,000 were made to James Martin for Senate (Allen seat) on October 6th and an in-kind contribution of use of video equipment of \$300.00 made on/about October 26th as is shown by our internal records, a copy of which is attached as Exhibit B.

V

That he is informed and believes that such cash expenditures are allowed under the provisions of 2 U.S.C. Section 441a(h).

VI

That in such capacity he supervised and directed the expenditure of funds in behalf of James Martin for Senate (Sparkman seat), as authorized by 2 U.S.C. 441a(d) and as assigned to the National Republican Senatorial Committee by Republican National Committee. Said expenditures in behalf of James Martin for Senate (Sparkman seat) are shown in the attached Exhibit C.

VII

That in such capacity he supervised and directed the expenditure of funds in behalf of James Martin for Senate (Allen seat) as authorized by 2 U.S.C. 441a(d) and as assigned to the National Republican Senatorial Committee by the Republican National Committee. Said expenditures in behalf of James Martin for Senate (Allen seat) are shown in the attached Exhibit D. As shown in said Exhibits C and D, a credit for funds or materials transferred from James Martin for Senate (Sparkman seat) to James Martin for Senate (Allen seat) in the amount of \$28,458.63 was made on October 2, 1978.

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VIII

That he is informed and believes that such agency agreements are proper and correct and that the same were in accordance with Commission Regulations # 110.7 and Advisory Opinion 1976-108.

IX

That he supervised and directed the expenditures for James Martin for Senate (Sparkman seat) and James Martin for Senate (Allen seat) as were assigned by allocation agreements from the Alabama (State) Republican Executive Committee, such expenditures being shown on the aforesaid Exhibits C and D.

X

That he is informed and believes that all such transactions were made properly and in accordance with Commission Advisory Opinion 1978-19 "Contributions to Two Campaigns by One Candidate" made in connection with the Fraser for Senate Campaigns, and that the Martin Campaigns are indistinguishable in all material aspects from said Fraser situation.

XI

That in order to make sure that all proper credits were made for cash or credits transferred from the Martin Committee (Sparkman seat) to the Martin Committee (Allen seat), the National Republican Senatorial Committee required a certified public accountant to make

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an on-site review of credits of cash and in-kind contributions transferred from the first committee to the second.

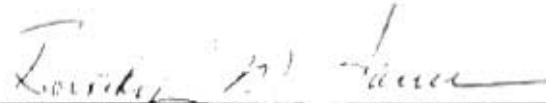
XII

Further deponent saith not.



Rodney A. Smith  
Treasurer, National Republican  
Senatorial Committee

Sworn to and subscribed before me a notary public in and for the District of Columbia this 11 day of January 1979.



Notary Public  
My commission expires 5.31.83

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STATE: ALABAMA - 9  
 CANDIDATE: TIM MARTIN

DATE	DESCRIPTION	R.S.C. CK No	R.M. R.S.C. Sect. 441 Expanded	CONTRIBUTION BALANCE
	LEGAL limit			17,500.
7 11		TRUST ACCOUNT	x 5,000.- ✓	12,500.
7 25	Holmes, Kennedy Co. Bell	TRUST ACCOUNT	x 2,500.- ✓	10,000.
6 19	Thomas / Tom Bell		x 197.- x	9,803.
8 4	Contrib. Sec 551	TRUST ACC	x 8,000.- ✓	1,803.
8 17	Contributions	TRUST	x 796.27 ✓	1,006.73

EXHIBIT A

STATE: ~~FLORIDA~~ FLORIDA  
 CANDIDATE: ~~Jim Murtin~~ Jim Murtin

DATE	DESCRIPTION	RSC CK. No.	RNC-RSC SECT. 441 EXPENDED	CONTRIBUTION Balance	
	Legal Limit			17,500	1
10 6	Carla Convent	Toward	\$1,700	\$ 500	3
10 26	Use of Video Eq used by Com		\$ 350	\$ 200	5

EXHIBIT B

790101522622

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STATE: ~~Massachusetts~~ <sup>Massachusetts</sup>  
 CANDIDATE: ~~John Martin~~ <sup>John Martin</sup>

DATE	DESCRIPTION	RSC CHK. No.	SECTION 441 NATIONAL		EXPENDITURES STATE		
			Expended	Balance	Expended	Balance	
	Level Limit Authority PNC		610000	62500		62500	1
							2
10 2	Transferred from Race #1		2845863x				3
							4
10 6	Holmes-Kennedy Transfer				66000x		5
	65,000 Bond		5000x	2654137		2000	6
10 19	Holmes-Kennedy Exp. Bond						7
	Total bond 29500		27500x	4137	5200x	-0-	8
10 26	Eastern Airlines	3871	2667x				9
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EXHIBIT D

Note: There is an o/s bill for CTR for  
 Commerce Exp in Boston Office - 10/25/71  
 We reported 3 - 10/25/71 - 10/25/71  
 amount



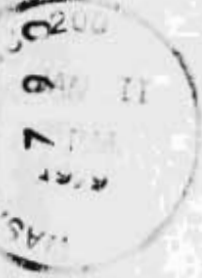
STATE: ALABAMA - Republican Rep -  
 CANDIDATE: JIM MARTIN

DATE	DESCRIPTION	RSC CK No.	SECTION		EXPENDITURES		BALANCE
			NATIONAL Expended	NATIONAL Balance	STATE Expended	STATE Balance	
1	LEGAL LIMIT		62506	62506	60000	62506	
2	9 1 Daniels & Assoc Trust Fee				* \$25000		
3	9 14 Daniel & Assoc Trust Fee				* \$25000		
4	9 29 Chris Ford Trust						10000
5	10 2 Walter Kinman Trust						
6	7 19 John H. Friendly				* \$30000		
7	10 15 Credited fr. Daniel & mo				< 137052		38629.5

EXHIBIT C

2545463 Transfer to State  
 Revt # Trust

10152625



79 JAN 19 2000

WASHINGTON

LAW OFFICES  
**JENKINS, NYSTROM & STERLACCI, P.C.**  
2033 M STREET, N.W., SUITE 504  
WASHINGTON, D.C. 20036

TO:

Kathleen Imig Perkins, Esq.  
Office of General Counsel  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

600#  
7022

LAW OFFICES

JENKINS, NYSTROM & STERLACCI, P.C.

MERLE R. JENKINS  
DENNIS H. NYSTROM  
MICHAEL A. STERLACCI  
CARL F. SCHIER  
JOSEPH E. JANNETTA  
JAMES F. SCHOENER  
STEPHEN J. HITCHCOCK  
CHRIS M. PARFITT  
GARY J. NYSTROM  
RONALD A. DENEWETH  
TIMOTHY J. MULLINS

2033 M STREET, N.W.  
WASHINGTON, D. C. 20036  
  
(202) 293-2505

79 JAN 11 11:30  
FEDERAL ELECTION COMMISSION  
OF COUNSEL  
JOHN B. CONLAN  
EDWARD A. RYDER  
MICHIGAN OFFICE  
15999 WEST TWELVE MILE ROAD  
SOUTHFIELD, MICHIGAN 48076  
(313) 589-2626

January 9, 1979

900150

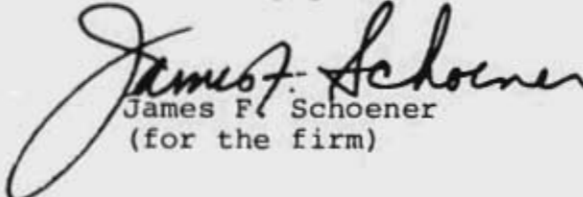
Charles N. Steele, Esq.  
Associate General Counsel  
Federal Election Commission  
1725 K Street, N.W.  
Washington, D.C. 20463

Re: M U R 820

Dear Mr. Steele:

Please enter our appearance in behalf of the National  
Republican Senatorial Committee in the above entitled  
matter.

Sincerely yours,

  
James F. Schoener  
(for the firm)

cc: James Howard Stewart, Jr.  
3701 Knollwood Drive  
Anniston, Alabama 36201

79040152626

LAW OFFICES

JENKINS, NYSTROM & STERLACCI, P.C.

2033 M STREET, N.W.

WASHINGTON, D. C. 20036



7.7040152627  
AM 9:00  
Charles N. Steele, Esq.  
Associate General Counsel  
Federal Election Commission  
1725 K Street, N.W.  
Washington, D.C. 20463



FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO CHARLES STEELE  
FROM: MARJORIE W. EMMONS *MORE*  
DATE: JANUARY 9, 1979  
SUBJECT: MUR 820 (78) - Interim Investigatory  
Report dated 1-3-79; Signed 1-4-79;  
Received in OCS 1-5-79, 1:25

The above-named document was circulated on a 24 hour no-objection basis at 12:00, January 8, 1979.

The Commission Secretary's Office has received no objections to the Interim Investigatory Report as of 1:00, this date.

79040152628



January 5, 1979

MEMORANDUM TO: Marge Emmons  
FROM: Elissa T. Garr  
SUBJECT: MUR 820

Please have the attached Interim Investigation  
Report on MUR 820 distributed to the Commission on a  
24 hour no-objection basis.

Thank you.

7 9 0 1 0 1 5 2 6 2 9

BEFORE THE FEDERAL ELECTION COMMISSION  
January 3, 1979

79 JAN 5 P 1: 25

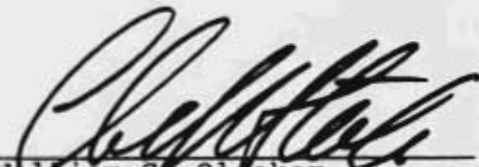
In the Matter of )  
 )  
National Republican Senatorial ) MUR 820 (78)  
Committee )

INTERIM INVESTIGATORY REPORT

On December 13, 1978, the Commission found reason to believe that the National Republican Senatorial Committee ("NRSC") may have violated 2 U.S.C. §441a(d) in connection with the Senatorial campaign of James Martin of Alabama, and voted to have the letter to the respondent revised and circulated to the Commission.

On December 22, 1978, the revised letter to NRSC was approved by the Commission. The letter was mailed to the respondent on January 3, 1979.

4 January 1979  
Date

  
\_\_\_\_\_  
William C. Oldaker  
General Counsel *4-11-79*

79040152630



FEDERAL ELECTION COMMISSION

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

January 4, 1979

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Rodney A. Smith, Treasurer  
National Republican Senatorial Committee  
227 Massachusetts Avenue, N.E.  
Washington, D.C. 20002

RE: MUR 820

Dear Mr. Smith:

The Federal Election Commission has received a complaint which alleges that the National Republican Senatorial Committee (NRSC) committed certain violations of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is attached. We have numbered this matter MUR 820. The Commission has reason to believe that the matters alleged in the complaint state a violation of 2 U.S.C. §441a(d). Specifically, it appears that:

- 1) NRSC reports filed with the Commission on October 10, 1978 (October Monthly Report) and on October 28, 1978 (10-Day Pre-Election Report) recite a total of \$211,700. in "\$441a(d) expenditures" on behalf of James Martin, Republican Candidate for Senate in the state of Alabama. This figure does not include expenditures made by the NRSC on behalf of candidate Martin after October 23, 1978.
- 2) The Commission's published calculations for party spending limits for Congressional contests ("§441a(d) limitations) limit the national and state committees of the Republican Party to spending a maximum of \$62,506.94 each on behalf of the Republic candidate for Senate in the state of Alabama.
- 3) If the National Republican Senatorial Committee acted as the authorized agent of both the National Republican Committee and the Alabama Republican Party, its total spending limit on behalf of Candidate Martin's Senatorial campaign was \$125,013.38 -- approximately \$86,687. less than already reported by the NRSC.

79040152631

The above facts support the Commission's finding of reason to believe that NRSC may have violated 2 U.S.C. §441a(d) by making expenditures in connection with the Senatorial campaign of James Martin of Alabama in excess of that provision of the Act.

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 analysis of this matter. In addition, please submit the following:

- 1) Written agreements authorizing the NRSC to act as the agent for both the Republican National Committee and the Alabama Republican Party in the expenditure "\$441a(d)" funds in Alabama.
- 2) An itemized listing of all "\$441a(d) expenditures" made by the NRSC in connection with James Martin's Senatorial campaign in Alabama made by the NRSC.

Where appropriate, statements should be submitted under oath.

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification.

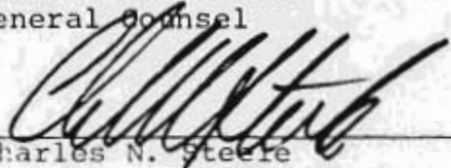
If you have any questions, please contact Kathleen Imig Perkins, the attorney assigned to this matter, at 202/523-4060.

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3)(B) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,

William C. Oldaker  
General Counsel



Charles N. Steele  
Associate General Counsel

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7 9 0 1 0 1 5 2 6 3 3

MUK P20 - ✓ Postmark

PS Form 3811, Apr 1977 RETURN RECEIPT REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER Complete items 1, 2, and 3  
Add your address in the "RETURN TO" space on reverse

1. The following service is requested (check one).  
 Show to whom and date delivered ..... \$  
 Show to whom, date, and address of delivery ..... \$  
 RESTRICTED DELIVERY  
 Show to whom and date delivered ..... \$  
 RESTRICTED DELIVERY  
 Show to whom, date, and address of delivery \$ .....  
 (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO  
 Rodney A. Smith, Treasurer  
 National Repub. Part. Comm.  
 227 Cottage Ave. N.E.

3. ARTICLE DESCRIPTION: Wash. D.C. 20002  
 REGISTERED NO. CERTIFIED NO. INSURED NO.  
 913417  
 (Always obtain signature of addressee or agent)

I have received the article described above.  
 SIGNATURE  Addressee  Authorized agent  
 M. House fus

4. DATE OF DELIVERY POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS



CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Rodney A. Smith, Treasurer  
National Republican Senatorial Committee  
227 Massachusetts Avenue, N.E.  
Washington, D.C. 20002

RE: MUR 820

Dear Mr. Smith:

The Federal Election Commission has received a complaint which alleges that the National Republican Senatorial Committee (NRSC) committed certain violations of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is attached. We have numbered this matter MUR 820. The Commission has reason to believe that the matters alleged in the complaint state a violation of 2 U.S.C. §441a(d). Specifically, it appears that:

- 1) NRSC reports filed with the Commission on October 10, 1978 (October Monthly Report) and on October 28, 1978 (10-Day Pre-Election Report) recite a total of \$211,700. in "§441a(d) expenditures" on behalf of James Martin, Republican Candidate for Senate in the state of Alabama. This figure does not include expenditures made by the NRSC on behalf of candidate Martin after October 23, 1978.
- 2) The Commission's published calculations for party spending limits for Congressional contests ("§441a(d) limitations) limit the national and state committees of the Republican Party to spending a maximum of \$62,506.94 each on behalf of the Republic candidate for Senate in the state of Alabama.
- 3) If the National Republican Senatorial Committee acted as the authorized agent of both the National Republican Committee and the Alabama Republican Party, its total spending limit on behalf of Candidate Martin's Senatorial campaign was \$125,013.38 -- approximately \$86,687. less than already reported by the NRSC.

7 9 0 4 0 1 5 2 6 3 4

The above facts support the Commission's finding of reason to believe that NRSC may have violated 2 U.S.C. §441a(d) by making expenditures in connection with the Senatorial campaign of James Martin of Alabama in excess of that provision of the Act.

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 analysis of this matter. In addition, please submit the following:

- 1) Written agreements authorizing the NRSC to act as the agent for both the Republican National Committee and the Alabama Republican Party in the expenditure "\$441a(d)" funds in Alabama.
- 2) An itemized listing of all "\$441a(d) expenditures" made by the NRSC in connection with James Martin's Senatorial campaign in Alabama made by the NRSC.

Where appropriate, statements should be submitted under oath.

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification.

If you have any questions, please contact Kathleen Imig Perkins, the attorney assigned to this matter, at 202/523-4060.

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3)(B) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,

William C. Oldham  
General Counsel

7 9 0 1 0 1 5 2 6 3 5

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 ) MUR 820  
National Republican Senatorial Committee )

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on December 22, 1978, the Commission determined by a vote of 6-0 to approve the proposed letter to the respondent which was attached to the General Counsel's memorandum dated December 19, 1978.

Attest:

12-22-78

Date

Margaret E. Chaney  
for Marjorie W. Emmons  
Secretary to the Commission

Received in Office of Commission Secretary: 12-20-78, 11:42  
Circulated on 48 hour vote basis: 12-20-78, 3:30

79040152636



FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO: CHARLES STEELE  
FROM: MARJORIE W. EMMONS *MJE lypc*  
DATE: DECEMBER 21, 1978  
SUBJECT: Comments on MUR 820 (78)

Attached is Commissioner Springer's vote sheet on  
MUR 820 with his comments.

ATTACHMENT:  
vote sheet

79040152637

43 HOUR TALLY SHEET

RECEIVED  
OFFICE OF THE  
COMMISSION SECRETARY



FEDERAL ELECTION COMMISSION

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

78 DEC 20 P 4: 39

Date and Time Transmitted: Dec. 20, 1978 - 3:30

Commissioner SPRINGER, AIKENS, TIERNAN, MCGARRY, THOMSON, HARRIS

RETURN TO OFFICE OF COMMISSION SECRETARY BY: December 22, 1978 - 3:30

MUR No. 820 Letter and Memorandum, dated 12-19-78

- I approve the recommendation
- I object to the recommendation

COMMENTS: Wishful thinking that Martin was the candidate of the "Republic" in numbered paragraph #2 on page 1, so presumed it should be Republican. (Otherwise, he would have won!)

Date: 12/20/78 Signature: William L. Springle  
*ldm*

THE OFFICE OF GENERAL COUNSEL WILL TAKE NO ACTION IN THIS MATTER UNTIL THE APPROVAL OF FOUR COMMISSIONERS IS RECEIVED. PLEASE RETURN ALL PAPERS NO LATER THAN THE DATE AND TIME SHOWN ABOVE TO THE OFFICE OF COMMISSION SECRETARY. ONE OBJECTION PLACES THE ITEM ON THE EXECUTIVE SESSION AGENDA.





December 20, 1978

MEMORANDUM TO: Marge Emmons  
FROM: Elissa T. Garr  
SUBJECT: MUR 820

Please have the attached letter and memo on  
MUR 820 distributed to the Commission on a 48  
hour tally basis.

Thank you.

7 7 0 4 0 1 5 2 6 3 9

RECEIVED  
OFFICE OF THE  
COMMISSION SECRETARY



FEDERAL ELECTION COMMISSION

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

78 DEC 20 11:42

December 19, 1978

TO: THE COMMISSION  
FROM: WILLIAM C. OLDAKER *W.C. Oldaker*  
SUBJECT: MUR 820 (Letter to Respondent)

Attached for your consideration is a proposed letter to be sent to the respondent in MUR 820.

We recommend that the Commission approve this letter for mailing.

77040152640



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Rodney A. Smith, Treasurer  
National Republican Senatorial Committee  
227 Massachusetts Avenue, N.E.  
Washington, D.C. 20002

RE: MUR 820

Dear Mr. Smith:

The Federal Election Commission has received a complaint which alleges that the National Republican Senatorial Committee (NRSC) committed certain violations of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is attached. We have numbered this matter MUR 820. The Commission has reason to believe that the matters alleged in the complaint state a violation of 2 U.S.C. §441a(d). Specifically, it appears that:

- 1) NRSC reports filed with the Commission on October 10, 1978 (October Monthly Report) and on October 28, 1978 (10-Day Pre-Election Report) recite a total of \$211,700. in "\$441a(d) expenditures" on behalf of James Martin, Republican Candidate for Senate in the state of Alabama. This figure does not include expenditures made by the NRSC on behalf of candidate Martin after October 23, 1978.
- 2) The Commission's published calculations for party spending limits for Congressional contests ("§441a(d) limitations) limit the national and state committees of the Republican Party to spending a maximum of \$62,506.94 each on behalf of the Republic candidate for Senate in the state of Alabama.
- 3) If the National Republican Senatorial Committee acted as the authorized agent of both the National Republican Committee and the Alabama Republican Party, its total spending limit on behalf of Candidate Martin's Senatorial campaign was \$125,013.38 -- approximately \$86,687. less than already reported by the NRSC.

77040152641

The above facts support the Commission's finding of reason to believe that NRSC may have violated 2 U.S.C. §441a(d) by making expenditures in connection with the Senatorial campaign of James Martin of Alabama in excess of that provision of the Act.

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 analysis of this matter. In addition, please submit the following:

- 1) Written agreements authorizing the NRSC to act as the agent for both the Republican National Committee and the Alabama Republican Party in the expenditure "\$441a(d)" funds in Alabama.
- 2) An itemized listing of all "\$441a(d) expenditures" made by the NRSC in connection with James Martin's Senatorial campaign in Alabama made by the NRSC.

Where appropriate, statements should be submitted under oath.

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification.

If you have any questions, please contact Kathleen Imig Perkins, the attorney assigned to this matter, at 202/523-4060.

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3)(B) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,

William C. Oldaker  
General Counsel

77040152642

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
National Republican ) MUR 820 (78)  
Senatorial Committee )

CERTIFICATION

I, Lena L. Stafford, Recording Secretary for the Executive Session of the Federal Election Commission held December 13, 1978, at a meeting at which a quorum was present, do hereby certify that the Commission determined by a vote of 6-0 to take the following actions in MUR 820:

1. Find reason to believe that the National Republican Senatorial Committee may have violated 2 U.S.C. §441a (d) by making expenditures in connection with the Senatorial campaign of James Martin of Alabama in excess of that provision of the Act.
2. Refer Recommendations 2 and 3 contained in the General Counsel's Report dated December 6, 1978, to the Reports Analysis Division to be handled under normal procedures for possible failure to report certain in-kind contributions or misrepresenting them as operating expenses.

(continued on page 2)

79040152643



MUR 820 (78)  
General Counsel's Report  
Dated: December 6, 1978  
CERTIFICATION

Page 2

3. Revise the letter attached to the General Counsel's report of December 6, 1978, and circulate it to the Commission on a no-objection basis.

Attest:

12/15/78

Date

Lena L. Stafford

Lena L. Stafford  
Recording Secretary

7 9 0 4 0 1 5 2 6 4 4

Received in Office of Commission Secretary: 12-6-78, 3:18  
Circulated on 48 hour vote basis: 12-7-78, 9:00  
Objection filed: 12/11/78, 11:50  
Placed on Agenda for December 13, 1978



FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO: CHARLES STEELE  
FROM: MARJORIE W. EMMONS *more by pc*  
DATE: DECEMBER 11, 1978  
SUBJECT: OBJECTION - MUR 820 - First General Counsel's  
Report dated 12-6-78  
Received in OCS:  
12-6-78, 3:18

The above-named document was circulated on a 48 hour vote basis at 9:00, December 7, 1978.

Your office was notified via a certification at 11:30, December 11, 1978, that the recommendations were approved by a vote of 4-0.

Commissioner Aikens submitted an objection at 11:50, December 11, 1978 thereby placing MUR 820 on the Executive Session Agenda for December 13, 1978.

Please destroy the above-mentioned certification.

7 9 0 4 0 1 5 2 6 4 5

December 6, 1978

MEMORANDUM TO: Marge Emmons  
FROM: Elissa T. Garr  
SUBJECT: MUR 820

Please have the attached First General Counsel's Report on MUR 820 distributed to the Commission a 48 hour tally basis.

Thank you.

7 0 0 4 0 1 5 2 6 4 6

FIRST GENERAL COUNSEL'S REPORT

78 DEC 6 P 3:18

DATE AND TIME OF TRANSMITTAL  
BY OGC TO THE COMMISSION DEC 6 1978

MUR NO. 820  
DATE COMPLAINT RECEIVED  
BY OGC  
STAFF  
MEMBER Perkins/Theford

SOURCE: Donald Stewart U.S. Senate Committee (The Friends of Donald Stewart Committee)

RESPONDENT'S NAME: National Republican Senatorial Committee

RELEVANT STATUTE: 2 U.S.C. §441a(d); 11 C.F. R. §110.7(a)(4);  
2 U.S.C. §434; 2 U.S.C. §441a.

INTERNAL REPORTS CHECKED: National Republican Senatorial Committee, Alabama Republican Party - Federal Account, Republican National Committee, Democratic National Committee, Democratic Senatorial Campaign Committee, DNC Services Corporation; AO 1976-108.  
FEDERAL AGENCIES CHECKED:

BACKGROUND

The Friends of Donald Stewart Committee filed a complaint alleging that the National Republican Senatorial Committee (NRSC) exceeded the spending limitations contained in 2 U.S.C. §441a(d) in the Senatorial Campaign of James Martin of Alabama. The complaint states that the Commission's published calculations for party spending limits for Congressional contests (§441a(d) limitations) would limit the national and state committees of the Republican Party to spending a maximum of \$62,506.94 each on behalf of the Republican candidate for Senate from the state of Alabama. See Attached Appendix A. Thus, the Republican National Committee and the Alabama Republican State Committee could spend no more than a combined total of \$125,013.88 in connection with the general election campaign of James Martin.

Reports filed by the NRSC on October 10, 1978 (October Monthly Report) and on October 28, 1978 (10-Day Pre-Election Report) recite a total of \$211,700 in §441a(d) expenditures on behalf of candidate Martin. Even if the NRSC is assuming the §441a(d) expenditure limitation of both the Republican National Committee and the Alabama Republican Party, this amount would exceed the §441a(d) limitation for candidate Martin's campaign by \$86,687. This figure does not include any §441a(d) expenditures made by the NRSC on behalf of candidate Martin after October 23, 1978. Such expenditures will presumably be reported on the committee's 30-Day Post Election Report due December 7, 1978.

79040152647

The complaint also alleges that the Federal Election Campaign Act of 1971, as amended, (FECA) does not "authorize the NRSC to act as the designated agent of the Alabama Republican State Committee for the purpose of making section 441a(d) expenditures." The complaint states that FEC regulations and Advisory Opinion 1976-108 would permit the NRSC to act as the agent of the Republican National Committee for the purpose of making §441a(d) expenditures. 11 C.F.R. §110.7(a)(4). However, complainant argues that no FECA provision or regulation would permit the NRSC to enter into a similar agency agreement with the Alabama Republican Party and thereby assume the State Party's §441a(d) limitation in addition to that of the National Party.

#### LEGAL ANALYSIS

2 U.S.C. §441a(d) provides the following exception to FECA's contribution and expenditure limitations for national and State committees:

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...(3) The national committee of a political party, or a State Committee of a political party, including any subordinate committee of a State committee, may not make any expenditure in connection with the general election campaign of a candidate for Federal office in a State who is affiliated with such party which exceeds --

(A) in the case of a candidate for election to the office of Senator...the greater of --

(i) two cents multiplied by the voting age population of the State...; or

(ii) \$20,000; ... 2 U.S.C. §441a(d)(3).

Pursuant to §441a(d), the Commission calculated the spending limitations for political parties for Senatorial candidates. The 1978 limit on party spending for Senate candidates in the state of Alabama in the general election was \$62,506.94. See Attached Appendix A. Therefore, the Republican National Committee and the Alabama Republican Committee were each limited to expenditures of \$62,506.94 in connection with the general election campaign of Jim Martin for Senate in Alabama.

FEC regulations, however, provide that the national committee of a political party may make such expenditures through a designated agent:

...(4) The national committee of a political party may make expenditures authorized by this section through any designated agent, including State and subordinate party committees. 11 C.F.R. §110.7(a)(4).

Therefore, the Republican National Committee could designate the National Republican Senatorial Committee to make expenditures on its behalf under §441a(d). See also Advisory Opinion 1976-108.



The complaint filed by the Friends of Donald Stewart Committee questions whether the Alabama Republican Party could designate the National Republican Senatorial Committee as its agent to make §441a(d) expenditures in connection with the general election campaign of Candidate Martin. Although FEC's regulations refer only to such an agency agreement between a national committee of a political party and any designated agent, the stated purpose of the regulation was to allow "the national committee and the state and subordinate State committees of a political party to make coordinated expenditures in the general election..." See Explanation and Justification of Regulations at 16 (July 1978). It would seem that the goal of coordinated party expenditures could be achieved by allowing the State Party to designate a national committee of the Party as its agent as well as by allowing the National Party to designate a State committee as its agent.

In addition, the fact that FECA permits unlimited transfers between national and State political committees would indicate that such an agency agreement would be permissible between the State committee and the National Committee. See 2 U.S.C. §441(a)(4). In other words, if 11 C.F.R. §110.7(a)(4) is read to allow such agency agreements for national committees but not for state committees, the Republican National Committee could merely transfer the maximum in allowable §441a(d) expenditures (\$62,506.94 for the Alabama Senatorial campaign) to the State Committee. Such a requirement would seem to place form over substance since the national and state party committees could be presumed to be working toward the same goal and probably even coordinating campaign strategy in connection with the Senatorial campaigns. Therefore, it is the opinion of the Office of General Counsel that the National Republican Senatorial Committee could make "§441a(d) expenditures" as agent for both the National Republican Committee and the Alabama Republican Committee in connection with the Senatorial campaign of candidate Martin in Alabama.

Thus, if the National Republican Senatorial Committee was acting as the designated agent for both the Republican National Committee and the Alabama Republican Committee, it could have spent a total of \$125,013.88 in connection with the general election campaign of James Martin for Senate in Alabama. Since the NRSC reports recite a total of \$211,700 in §441a(d) expenditures for candidate Martin, there is reason to believe that the NRSC exceeded the spending limits as defined in 2 U.S.C. §441a(d).

#### ADDITIONAL FINDINGS

Initial investigation of NRSC Reports in connection with this matter disclosed an additional apparent violation in reporting certain expenditures as operating expenditures. On December 19, 1977, the Commission advised the NRSC that its payment of official expenses of Republican senators would not be considered a contribution or expenditure "as long as the payment is not made for the purpose of influencing their nomination or election." See AO 1977-50. The Advisory Opinion is limited to the question of payment of official expenses of senators by the NRSC.

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NRSC reports indicate that NRSC has been making such expenditures and reporting them on FEC Form 3, line 20(a) as "operating expenses." Thus, NRSC's October Monthly Report includes the following expenditures as "operating expenses:

Subscription (Sen. Weicker)	9/13/78	\$70.00
Subscription (Sen. Weicker)	9/13/78	19.50
Subscription (Sen. Weicker)	9/13/78	30.60
Film Processing (Sen. Weicker)	9/13/78	101.59
One Photo (Sen. Javits)	9/13/78	15.75
Public Affairs Counsel (Sen Dole)	9/13/78	-1,000.00

Such expenditures might reasonably be concluded to fall within the permissible parameters of AO 1977-50. If such is the case, NRSC's own stated procedure would indicate that the Committee would have on file for each such expenditure a request form submitted by the Senator containing "the requested amount, the purpose of the expense, a certification that the expense was not incurred for the purpose of influencing a federal election and the signature of the requesting Senator." See AO 1977-50 at 1.

However, in addition to such expenditures possibly relating to an incumbent's official duties, the NRSC report of operating expenses also includes similar expenditures to non-incumbent candidates for Senate. Thus, NRSC's September 30th Report includes the following as "operating expenses":

Postage (Thad Cochran, U.S. Senate)	9/20/78	\$127.50
Postage (Bill Armstrong, U.S. Senate)	9/21/78	75.00
Postage (Don Shasteen, U.S. Senate)	9/31/78	3,000.00
Typing Services (Dave Durenberger, U.S. Senate)	9/26/78	-2,090.05
Air Travel (Nancy Kassebaum, U.S. Senate)	9/26/78	305.00
Direct Mail Services (Dave Durenberger, U.S. Senate)	9/27/78	-8,929.80
Direct Mail Services (Dave Durenberger, U.S. Senate)	9/27/78	-7,140.00

None of the above-named individuals was a Senator at the time of the listed expenditures. Therefore, these expenditures would not be justified as payment of official expenses of Senators pursuant to AO 1977-50. In addition, the expenditures are the type which, made approximately 6 weeks prior to the election, could be presumed to be in connection with the election and therefore in-kind contributions to the individual candidates.

Thus, there is reason to believe that the NRSC may have violated the disclosure provisions of 2 U.S.C. §434 by reporting certain in-kind contributions as operating expenses. In addition, there is reason to believe that the NRSC may have violated the contribution limitations of 2 U.S.C. §441a when those in-kind contributions, reported as operating expenses, are combined with the reported contributions to each candidate.

RECOMMENDATIONS

1. Find reason to believe that the National Republican Senatorial Committee may have violated 2 U.S.C. §441a(d) by making expenditures in connection with the Senatorial campaign of James Martin of Alabama in excess of that provision of the Act.

2. Find reason to believe that the National Republican Senatorial Committee may have violated 2 U.S. C. §434 by reporting certain in-kind contributions as party operating expenses.

3. Find reason to believe that the National Republican Senatorial Committee may have violated 2 U.S.C. §441a when certain in-kind contributions, reported as operating expenses, are combined with the reported contributions to each candidate.

4. Send the attached letter .

ATTACHMENTS

1. Letter to Respondent.
2. Copy of complaint.

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FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Rodney A. Smith, Treasurer  
National Republican Senatorial Committee  
227 Massachusetts Avenue, N.E.  
Washington, D.C. 20002

RE: MUR 820

Dear Mr. Smith:

The Federal Election Commission has received a complaint which alleges that the National Republican Senatorial Committee (NRSC) committed certain violations of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is attached. We have numbered this matter MUR 820. The Commission has reason to believe that the matters alleged in the complaint state a violation of 2 U.S.C. §441a(d). In addition, in reviewing NRSC reports in connection with this matter, the Commission noted that the reports indicate reason to believe that a violation of 2 U.S.C. §§434, 441a(a) has also occurred. Specifically, it appears that:

- 1) NRSC reports filed with the Commission on October 10, 1978 (October Monthly Report) and on October 28, 1978 (10-Day Pre-Election Report) recite a total of \$211,700. in "\$441a(d) expenditures" on behalf of James Martin, Republican Candidate for Senate in the state of Alabama. This figure does not include expenditures made by the NRSC on behalf of candidate Martin after October 23, 1978.
- 2) The Commission's published calculations for party spending limits for Congressional contests ("§441a(d) limitations) limit the national and state committees of the Republican Party to spending a maximum of \$62,506.94 each on behalf of the Republic candidate for Senate in the state of Alabama.
- 3) If the National Republican Senatorial Committee acted as the authorized agent of both the National Republican Committee and the Alabama Republican Party, its total spending limit on behalf of Candidate Martin's Senatorial campaign was \$125,013.38 -- approximately \$86,687. less than already reported by the NRSC.

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- 4) In addition, NRSC's October Monthly Report (for the period September 1-30, 1978) reports certain "operating expenses" which are allocated to individual Senators. As an example,

Subscription (Sen. Weicker)	9/13/78	\$ 70.00
Subscription (Sen. Weicker)	9/13/78	19.50
Subscription (Sen. Weicker)	9/13/78	30.60
Film Processing (Sen. Weicker)	9/13/78	101.59
One Photo (Sen Javits)	9/13/78	15.75
Public Affairs Counsel (Sen. Dole)	9/13/78	-\$1,000.00

- 5) The same report (October Monthly) also includes the following as "operating expenses":

Postage (Thad Cochran, U.S. Senate)	9/20/78	- \$127.50
Postage (Bill Armstrong, U.S. Senate)	9/21/78	-\$75.00
Postage (Don Shasteen, U.S. Senate)	9/21/78	-\$3,000.00
Typing Services (Dave Durenberger, U.S. Senate)	9/26/78	- \$2,090.05
Air Travel (Nancy Kassebaum, U.S. Senate)	9/25/78	-\$305.00
Direct Mail Services (Dave Durenberger, U.S. Senate)	9/27/78	-\$8,929.80
Direct Mail Services (Dave Durenberger, U.S. Senate)	9/27/78	-\$7,140.00

The above facts support the Commission's finding of reason to believe that NRSC may have violated 2 U.S.C. §441a(d) by making expenditures in connection with the Senatorial campaign of James Martin of Alabama in excess of that provision of the Act; 2 U.S.C. §434 by reporting certain in-kind contributions as party operating expenses; and 2 U.S.C. §441a(a) when certain in-kind contributions, reported as operating expenses are combined with the reported contributions to each candidate.

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 analysis of this matter. In addition, please submit the following:

- 1) Written agreements authorizing the NRSC to act as the agent for both the Republican National Committee and the Alabama Republican Party in the expenditure "\$441a(d)" funds in Alabama.
- 2) An itemized listing of all "\$441a(d) expenditures" made by the NRSC in connection with James Martin's Senatorial campaign in Alabama made by the NRSC.

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- 3) An itemized listing of any expenditures made by the NRSC during 1978, reported as "operating expenses", and allocated to individual Senatorial candidates or Senators.
- 4) Supporting documentation that such expenditures, reported as "operating expenses", were not in connection with a federal election.

Where appropriate, statements should be submitted under oath.

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification.

If you have any questions, please contact Kathleen Imig Perkins, the attorney assigned to this matter, at 202/523-4060.

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3)(B) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,

William C. Oldaker  
General Counsel

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MUR 820

see 5485

# Donald Stewart

## U.S. Senate

*Handwritten signature: Perkins*  
*Handwritten text: The Defeat*

November 3, 1978

Office of the General Counsel  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D. C. 20463

807653

Dear Sir:

The Friends of Donald Stewart Committee, a political committee supporting the candidacy of Donald Stewart for the United States Senate, files this complaint alleging that the National Republican Senatorial Committee (NRSC) has violated the party spending limitations contained in section 441a(d) of the Federal Election Campaign Act. In the current general election campaign for U. S. Senate in Alabama, NRSC has expended \$194,700 on behalf of the Republican candidate Jim Martin, which is \$69,686.12 in excess of the limits under section 441a(d). This gross violation of the law by NRSC, which has resulted in the expenditure of thousands of illegal dollars in the Alabama Senate election, requires the Federal Election Commission's most urgent attention.

According to published FEC calculations, the national and state committees of a political party may each spend a maximum \$62,506.94 under section 441a(d) on behalf of a candidate for the United States Senate in Alabama. See Appendix A (with relevant figures underlined) attached to this complaint. Thus the Republican National Committee and the Alabama Republican State Committee may spend no more than a combined total of \$125,013.88 on behalf of Jim Martin. Yet between September 1, 1978 and October 19, 1978 the NRSC, acting as a designated agent of the national and state Republican committees, has spent \$194,700 in expenditures on behalf of Mr. Martin -- \$69,686.12 in excess of the legal limit. This violation is documented by NRSC's own reports to the FEC, filed October 10 and October 28, where these unlawful monies are recorded on Schedule F. \*/See appendix B and Appendix C,

\*/ Schedule F also confirms that the designated NRSC is proceeding on the theory that it may act as the designated agent of both the Republican National Committee and the Alabama Republican State Committee in making those 441a(d) expenditures.

PO Box 2274  
Anniston, Alabama 36201  
(205) 237-9311

2727 1/2 Seventh Avenue South  
Birmingham, Alabama 35233  
(205) 252-5204 (205) 252-5064

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Office of the General Counsel  
Federal Election Commission  
November 3, 1978  
page two

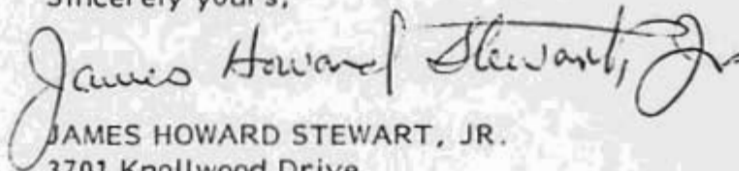
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The Friends of Donald Stewart Committee further alleges that the Act does not authorize the NRSC to act as the designated agent of the Alabama Republican State Committee for the purpose of making section 441a(d) expenditures. Section 110.7(a)(4) of the FEC's regulations, together with the FEC's own Advisory Opinion 1976-108, make allowance only for an agency agreement under section 441a(d) between NRSC and the Republican National Committee, thereby enabling NRSC, as the agent for the National Committee, to spend a maximum \$62,506.94 on behalf of Mr. Martin. No legal grounds exist for a similar agency agreement between NRSC and the Alabama State Republican Committee -- but NRSC assumes nonetheless that it may enter into such an agreement and spend an additional \$62,506.94 on behalf of Mr. Martin. If the Commission concurs with the Friends of Donald Stewart that NRSC has misconstrued its authority under section 441a(d), and cannot act as agent for the State Committee, then NRSC has exceeded the lawful limit under that section by \$132,193.06.

The party spending allowed for under section 441a(d) is substantial, and should have been sufficient to satisfy the NRSC. Instead this committee has made a mockery of the limit contained in section 441a(d); it has unleashed a flood of funds well in excess of the lawful limit, an action which expresses this committee's disregard of the law, and which undermines prospects for a fair election to the United States Senate in Alabama.

This complaint is filed by me on behalf of Donald Stewart's candidacy for the United States Senate from Alabama.

Sincerely yours,




JAMES HOWARD STEWART, JR.  
3701 Knollwood Drive  
Anniston, Alabama 36201  
Telephone Number (205) 236-5367

Campaign Chairman

STATE OF ALABAMA )  
JEFFERSON COUNTY )

Before the undersigned Notary Public, in and for the State of Alabama at large, personally appeared JAMES HOWARD STEWART, JR., who being known or made known to me and by me first duly sworn, on his oath stated that the facts stated in the above and foregoing complaint signed by him this day are true.

Given under my hand and seal this the 21 day of November, 1978.

  
\_\_\_\_\_  
Notary Public

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## APPENDIX A

### PARTY SPENDING LIMITS FOR CONGRESSIONAL CONTESTS

The Federal Election Commission has calculated the spending limitations for political parties for congressional candidates. The limits are effective for 1978. Back reference.— Law § 140.

#### PARTY COORDINATED EXPENDITURE LIMITS - 1978

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

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

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

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

#### Senatorial:

State Voting Age Population (VAP) x 50.02, plus the 1978 increase in the Consumer Price Index (CPI) of 22.9 percent; or \$24,580.00, whichever is greater. (See chart below.)

#### Congressional:

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

#### PARTY SPENDING LIMITS FOR SENATE CANDIDATES

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

State	VAP (in thousands)	1978 Party Spending Limitations
Alabama	2,543	562,506.94
Alaska*	258	24,580.00
Arizona	1,562	38,393.96
Arkansas	1,494	36,722.52
California	15,627	384,111.66
Colorado	1,828	44,932.24
Connecticut	2,238	55,010.04
Delaware*	407	24,580.00
Florida	6,219	152,863.02
Georgia	3,450	84,801.00
Hawaii	615	24,580.00
Idaho	574	24,580.00
Illinois	7,873	193,518.34
Indiana	3,690	90,700.20
Iowa	2,025	49,774.50
Kansas	1,664	40,901.12
Kentucky	2,402	59,041.16
Louisiana	2,609	64,129.22
Maine	755	24,580.00
Maryland	2,921	71,793.18
Massachusetts	4,166	102,400.28
Michigan	6,284	154,460.72
Minnesota	2,765	67,963.70
Mississippi	1,575	38,713.50
Missouri	3,417	83,989.86
Montana	523	24,580.00
Nebraska	1,095	26,915.10
Nevada*	439	24,580.00
New Hampshire	594	24,580.00
New Jersey	5,224	128,405.92
New Mexico	783	24,580.00
New York	12,879	316,565.82
North Carolina	3,654	94,977.12
North Dakota*	450	24,580.00
Ohio	7,484	183,956.72
Oklahoma	1,994	49,012.52
Oregon	1,695	41,663.10
Pennsylvania	8,508	209,126.64
Rhode Island	673	24,580.00
South Carolina	1,953	48,004.74
South Dakota	475	24,580.00
Tennessee	3,028	74,428.24
Texas	8,773	215,640.34
Utah	797	24,580.00
Vermont*	336	24,580.00
Virginia	3,631	89,249.98
Washington	2,589	63,637.62
West Virginia	1,313	32,273.54
Wisconsin	3,244	79,737.52
Wyoming	278	24,580.00
District of Columbia	505	12,290.00
Guam	49	12,290.00
Puerto Rico	2,010	12,290.00
Virgin Islands	59	12,290.00

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APPENDIX B

FEC FORM 3  
REVISED  
January 1978  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

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)

*hand  
delivered*  
7/25/78

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. National Republican Senatorial Committee - Contributions S 323 2. ID No. C00091009  
 Name of Candidate or Committee in full Candidate for Committee  
227 Massachusetts Ave., N. E. 3. \_\_\_\_\_  
 Address (number and street) Office Sought, State, District (if applicable)  
Washington, D. C. 20002  
 City, State and ZIP Code  Check if address is different than previously reported Year of Election \_\_\_\_\_

4. Type of Report (check appropriate boxes)  
 April 10 Quarterly Report  Tenth day report preceding \_\_\_\_\_ election (primary, general or convention)  Terminal Report  
 July 10 Quarterly Report or \_\_\_\_\_ in the State of \_\_\_\_\_  Amending report  
 October 10 Quarterly Report  Thirtieth day report following \_\_\_\_\_ election (which report?)  
 January 31 Annual Report (primary, general or convention)  
 Monthly Report \_\_\_\_\_ on \_\_\_\_\_ in the State of \_\_\_\_\_  
 This is a report to:  Primary Election  General Election  Primary and General  Other (state in full), 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
July 1 Through September 30, 1978		
6. Cash on hand January 1, 1978		\$ -0-
7. Cash on hand at beginning of reporting period	\$ 970,588.96	
8. Total receipts from line 10	\$ 1,641,974.14	\$ 3,412,563.10
(Add Subtotal - Add lines 7 and 8 for Column A and lines 6 and 8 for Column B)	\$ 2,612,563.10	\$ 3,412,563.10
9. Total expenditures from line 12	\$ 1,200,000.00	\$ 2,000,000.00
10. Cash on hand at close of reporting period (Subtract line 9 from line 8)	\$ 1,412,563.10	\$ 1,412,563.10
11. Cash on hand at close of reporting period (Subtract line 9 from line 8) (ATTACH SCHEDULE D)	\$ _____	
12. Direct obligations owed to the Committee/Candidate from (a) or (b) - Schedule C	\$ 147,150.00	
13. Indirect obligations owed to the Committee/Candidate from (a) or (b) - Schedule C	\$ _____	

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.  
 Oct. 10, 1978 Rodney A. Smith, Treasurer *Rodney A. Smith*  
 (Date) (Typed Name of Treasurer or Candidate) (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 437, or Section 431, see reverse side of form.

For further information, contact: Federal Election Commission, 1325 K Street, N.W., Washington, D.C. 20463 or call 800-424-9532. Accounting: GAO, B-187670-1405061, Expires 3/31/83.

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

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

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

NAME OF CANDIDATE OR COMMITTEE Senatorial Committee—Contributions	REPORT COVERING THE PERIOD	
	FROM: July 1	TO: September 30, 1978
<b>RECEIPTS</b>		
	Column A This Period	Column B Calendar Year To-Date
14. Contributions from individuals (including contributions in-kind) (a) Itemized (use Schedule A) (b) Unitemized (c) Sales and collections included above (1) by events on memo Schedule D 15 _____ 1 (d) Subtotal of contributions from individuals	\$ 738,201.50 \$ 810,063.64 \$ 1,548,265.14	\$ 3,211,812.32
15. Transfers from Political Committees (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	\$ 47,263.57 \$ --- \$ 47,263.57	\$ 153,167.81
16. Other Income (a) Itemized (use Schedule A) (b) Unitemized (c) Subtotal of other income	\$ 46,300.91 \$ --- \$ 46,300.91	\$ 46,300.91
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	\$ --- \$ 144.52 \$ 144.52	\$ 1,282.06
19. Total Receipts	\$ 1,641,974.14	\$ 3,412,563.10
<b>EXPENDITURES</b>		
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 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	\$ 1,200,000.00 \$ --- \$ 1,200,000.00	\$ 2,000,000.00
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	\$ 1,200,000.00	\$ 2,000,000.00
<b>RECEIPTS AND EXPENDITURES, NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES</b>		
26. Total Receipts (from line 19)	\$ 1,641,974.14	\$ 3,412,563.10
27. Transfers In (from line 15(d))	\$ 47,263.57	\$ 153,167.81
28. Net Receipts (Subtract line 27 from line 26)	\$ 1,594,710.57	\$ 3,259,395.29
29. Total Expenditures (from line 25)	\$ 1,200,000.00	\$ 2,000,000.00
30. Transfers Out (from line 22(d))	\$ 1,200,000.00	\$ 2,000,000.00
31. Net Expenditures (Subtract line 30 from line 29)	\$ ---	\$ ---

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Form 280, 1973  
Federal Election Commission  
1225 K Street, N.W.  
Washington, D.C. 20483

**FINANCED COORDINATED EXPENDITURES MADE BY  
POLITICAL PARTY COMMITTEES OR ASSOCIATED AGENTS  
ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE  
(2 U.S.C. 441a(d))  
(Supporting Line 24, FEC Form 3)**

Page 1 of 2  
For Line 24, FEC Form 3

(To be used only by Political Committees in the General Election)

Name of Political Committee in Full

**National Republican Senatorial Committee-Expenditures**

Has your Committee been designated to make coordinated expenditures by a political party committee?  YES  NO  
If YES, name the designating committee: **Republican National and/or Respective State Committees**

Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Daniels & Associates, Inc. 400 Office Park Drive Birmingham, Alabama 35223	Martin for U.S. Senate Alabama	Media Advertising & Programming	9-1-78	25,000.00
	Aggregate General Election Expenditure for this Candidate - \$			
R. J. Sann & Associates 630 - 9th Avenue New York, New York 10030	Kansas for Kassebaum Kansas	Media Advertising	9-1-78	20,000.00
	Aggregate General Election Expenditure for this Candidate - \$			
Monarch Printing Corp. 1130 West Adams Street Chicago, Illinois 60607	Citizens for Percy Illinois	Printing services	9-5-78	1,849.00
	Aggregate General Election Expenditure for this Candidate - \$			
Rosanek Golub & Company 8 South Michigan Ave. 625 N. Michigan Ave. Chicago, Illinois 60611	Citizens for Percy Illinois	Monthly rent for office space	9-5-78	1,487.54
	Aggregate General Election Expenditure for this Candidate - \$			
Befley, Deardourff & Associates Suite 01120 733 - 15th St., N. W. Washington, D. C. 20005	Citizens for Percy Illinois	Media Advertising	9-5-78	10,000.00
	Aggregate General Election Expenditure for this Candidate - \$			
SUBTOTAL of expenditures this page (optional).....				\$
TOTAL this period (last page this line number only).....				\$

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Form 28  
 May, 1978  
 Federal Election Commission  
 235 K Street, N.W.  
 Washington, D.C. 20463

**EXPENDITURES MADE BY  
 POLITICAL PARTY COMMITTEES OR DESIGNATED AGENTS  
 ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE  
 (2 U.S.C. 441a(d))  
 (Supporting Line 24, FEC Form 3)**

Page 9 of 12  
 For Line 24, FEC Form 3

(To be used only by Political Committees in the General Election)

Name of Political Committee in Full				
National Republican Senatorial Committee-Expenditures				
Has your Committee been designed to make coordinated expenditures by a political party committee? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO				
If YES, name the designating committee: <u>Republican National and/or Respective State Committees</u>				
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Daniels & Associates 402 Office Park Drive Suite #110 Birmingham, Alabama 35223	Martin for U.S. Senate Alabama	Media Advertising	9-19-78	\$ 25,000.00
	Aggregate General Election Expenditure for this Candidate - \$			
Northwest Bell Telephone Company 1432 Soo line Building Minneapolis, Minnesota 55402	Durenberger for Senate Minnesota	Telephone service	9-19-78	3,500.00
	Aggregate General Election Expenditure for this Candidate - \$			
Shasteen for Senate 820 South 13th Street Lincoln, Nebraska 68508	Don Shasteen U.S. Senate Nebraska	Sec. 441 Contribution	9-20-78	6,000.00 ✓
	Aggregate General Election Expenditure for this Candidate - \$			
Paul P. Orergaard Greenbriar Apartments 10401 S. Cedar Lake Rd. Minnetonka, Minnesota 55343	Durenberger for Senate Minnesota	Political Consulting	9-20-78	1,500.00 ✓
	Aggregate General Election Expenditure for this Candidate - \$			
Thomas F. Horner Apt. #307 6300 York Ave., South Edina, Minnesota 55435	Durenberger for Senate Minnesota	Political Consulting	9-20-78	1,000.00 ✓
	Aggregate General Election Expenditure for this Candidate - \$			
SUBTOTAL of expenditures this page (optional) .....				\$
TOTAL this period (last page this line number only) .....				\$

79020151325

Form 1233  
 Joint Election Commission  
 28 M Street, N.W.  
 Washington, D.C. 20003

REGULATED EXPENDITURES MADE BY  
 POLITICAL PARTY COMMITTEES OR DESIGNATED AGENTS  
 ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE  
 (2 U.S.C. 441a(d))  
 (Supporting Line 24, FEC Form 3)  
 (To be used only by Political Committees in the General Election)

Page 22 of 23  
 For Line 24, FEC Form 3

Name of Political Committee as Full  
**National Republican Senatorial Committee - Expenditures**

Has your Committee been designated to make coordinated expenditures by a political party committee?  YES  NO  
 If YES, name the designating committee: **Republican National and/or respective State Committee**

Full name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Tom Horner Suite #164 8120 Penn Ave., South Minneapolis, Mn. 55431	Durenberger for Senate Minnesota	Consulting Services	9-29-78	\$ 3,000.00
Aggregate General Election Expenditure for this Candidate - \$				
Northwestern Bell Telephone Co. 1432 Soo Line Bldg. Minneapolis, Mn. 55402	Durenberger for Senate Minnesota	Telephone Services	9-29-78	2,371.52
Aggregate General Election Expenditure for this Candidate - \$				
Paul Overgaard Suite #164 8120 Penn Ave., South Minneapolis, Mn. 55431	Durenberger for Senate Minnesota	Consulting Services	9-29-78	4,500.00
Aggregate General Election Expenditure for this Candidate - \$				
Market Opinion Research 28 West Adams Detroit, Michigan 48226	Durenberger for Senate Minnesota	Telephoning Poll	9-29-78	8,850.00
Aggregate General Election Expenditure for this Candidate - \$				
Christopher D. Lord 5401 Westbard Ave. Apt. #1507 Bethesda, Md. 20016	Martin for U. S. Senate Alabama	Consulting Services	9-29-78	200.00
Aggregate General Election Expenditure for this Candidate - \$				

SUBTOTAL of expenditures this page (optional) ..... \$  
 TOTAL this period (last page this line number only) ..... \$

79020151338



FD-204 (1-73)  
January, 1973  
Federal Election Commission  
1025 K Street, N.W.  
Washington, D.C. 20543

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

SECRET

RECEIVED  
FEB 20 1973

Except for Candidates of Committees Receiving Federal Matching Funds

Please Candidates authorized by a committee to receive contributions and make expenditures in accordance with the provisions of the Federal Election Campaign Act of 1971, as amended, and the regulations thereunder.

1. National Republican Senatorial Committee 2. I.D. No. 10001000  
Name of Candidate or Committee (or both) Contributions Candidate/Committee  
227 Massachusetts Ave., N. E.  
Address (number and street) Office (number, street, district, etc. if applicable)  
Washington, D. C. 2000 S 323  
City, State and ZIP Code  Check if address is different than previously reported. Year of Election \_\_\_\_\_  
3. Type of Report (check appropriate boxes).  
 April 10 Quarterly Report  Tenth day report preceding General election (primary, general or convention)  Verification Report  
 July 10 Quarterly Report on November 7 in the State of \_\_\_\_\_  Amendment for \_\_\_\_\_  
 October 10 Quarterly Report (date) (which report)  
 January 10 Annual Report  Thirtieth day report following \_\_\_\_\_ election (primary, general or convention)  
 Monthly Report (month) on \_\_\_\_\_ (date) in the State of \_\_\_\_\_  
This is a report for  Primary Election  General Election  Primary and General  Other Federal, state, or local

SUMMARY OF RECEIPTS AND EXPENDITURES

(Figures may be rounded to nearest dollar.)

5. Covering Period	Column 1 This Period	Column 2 End of Period
6. Cash on hand January 1, 1973		\$ -0-
7. Cash on hand at beginning of reporting period	\$ 665,700.00	
8. Total receipts (from line 10)	\$ 302,823.77	\$ 3,655,801.77
(a) Subtract (deduct) lines 1 and 2 for Column 1 and lines 6 and 8 for Column 2	\$ 959,154.75	\$ 3,655,801.77
9. Total expenditures (from line 11)	\$ 100,000.00	\$ 3,207,647.77
10. Cash on hand at close of reporting period (subtract line 9 from line 8)	\$ 159,354.75	\$ 100,156.75
11. Value of contractual items on hand to be liquidated (attach itemized list)	\$	\$
12. Debt and obligations owed to the Committee/Candidate (itemize on Schedule C)	\$ 100,410.00	
13. Debt and obligations owed by the Committee/Candidate (itemize on Schedule C)	\$	

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.  
10/27/73 Redney A. Smith Redney A. Smith  
(Date) (Typed Name of Treasurer or Candidate) (Signature of Treasurer or Candidate)

Note: Submission of false information or incomplete information on this subject is a violation of the laws governing this Report to the penalties of 2 U.S.C. Section 6225, or Section 413) (see reverse side of form).

For further information, contact:



Federal Election Commission  
1025 K Street, N.W.  
Washington, D.C. 20543

or call 202/456-9545

Approved by GPO  
1973 O-200-000-000  
Revised 10-1-73

All previous editions of FD FORM 2 are obsolete and should no longer be used.

Any information reported hereon may be used for statistical purposes for the purpose of assisting candidates for public office.

72212152661  
79020150547

**DETAILED SUMMARY OF RECEIPTS AND EXPENDITURES**  
 Page 2, SEC FORM 3

7 2 7 0 0 2 1 7 3 6 6 4 3

NAME OF CANDIDATE OR COMMITTEE National Republican Senatorial Committee - Contributions		REPORT COVERING THE PERIOD FROM: Oct. 1 TO: Oct. 23, 1970	
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)	\$ 180,989.50		
(b) Unitemized	\$ 162,263.45		
(c) Sales and collections included (Itemize by name on memo Schedule D (S _____))			
(d) Subtotal of contributions from individuals	\$ 343,252.95	\$ 3,455,400.29	
<b>15. Transfers from Political Committees:</b>			
(a) Funds from affiliated/authorized committee (Itemize on Schedule A regardless of amount)	\$ 9,200.00		
(b) Funds from other committees (Itemize on Schedule A regardless of amount)	\$ 9,200.00		
(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	\$ 9,200.00	\$ 162,367.81	
<b>16. Other Income:</b>			
(a) Itemized (Use Schedule A)	\$		
(b) Unitemized	\$		
(c) Subtotal of other income	\$	\$ 66,300.91	
<b>17. Loans and Loan Repayments Received:</b>			
(a) Itemized (Use Schedule A)	\$		
(b) Unitemized	\$		
(c) Subtotal of loans and loan repayments received	\$	\$	
<b>18. Refunds, Rebates, Returns of Deposits:</b>			
(a) Itemized (Use Schedule A)	\$ 3,370.82		
(b) Unitemized	\$		
(c) Subtotal of refunds, rebates, returns of deposits	\$ 3,370.82	\$ 2,600.00	
<b>19. Total Receipts</b>	<b>\$ 353,823.77</b>	<b>\$ 3,666,801.89</b>	
<b>EXPENDITURES</b>			
<b>20. Operating Expenditures:</b>			
(a) Itemized (Use Schedule E)	\$		
(b) Unitemized	\$		
(c) Subtotal of operating expenditures	\$	\$	
<b>21. Loans, Loan Repayments, and Contribution Refunds Made:</b>			
(a) Itemized (Use Schedule E)	\$		
(b) Unitemized	\$		
(c) Subtotal of loans and loan repayments made and contribution refunds	\$	\$	
<b>22. Transfers Out to Political Committees:</b>			
(a) To affiliated/authorized committee (Itemize on Schedule C regardless of amount)	\$ 800,000.00		
(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	\$ 800,000.00	\$ 3,507,647.56	
<b>23. Independent Expenditures (Use Schedule E)</b>	\$	\$	
<b>24. Coordinated Expenditures Made by Political Committees (2 U.S.C. 441(a)(1) (Itemize on Schedule F))</b>	\$	\$	
<b>25. Total Expenditures</b>	<b>\$ 800,000.00</b>	<b>\$ 3,507,647.56</b>	
<b>RECEIPTS AND EXPENDITURES, NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES</b>			
<b>26. Total Receipts (from line 19)</b>	\$		
<b>27. Transfers In (from line 15(d))</b>	\$		
<b>28. Net Receipts (Subtract line 27 from line 26)</b>	\$		
<b>29. Total Expenditures (from line 25)</b>	\$ 800,000.00		
<b>30. Transfers Out (from line 22(a))</b>	\$ 800,000.00		
<b>31. Net Expenditures (Subtract line 30 from line 29)</b>	\$		



Form 7021  
 23 & Cover, FISC  
 January, D.C. 20408

**POLITICAL PARTY COMMITTEE DISBURSED ASSETS  
 ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE  
 (U.S.C. 441a(d))  
 (Supporting Line 24, FEC Form 3)**

See Line 24, FEC Form 3

(To be used only by Political Committees in the General Election)

7-2010152666  
 7R020152771

Name of Political Committee in Full				
National Republican Senatorial Committee - Expenditures				
Has your Committee been organized to make coordinated expenditures by a political party committee?				
If YES, state the organization pattern: Republican National and/or Respective State Committees				
Full Name, Mailing Address and ZIP Code of Each Payer	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Automated Business Mail 5515 Livingston Road, S.E. Washington, D. C. 20021	Citizens for Cochran Mississippi	Typing Services	10/2/78	\$ 1,059.74
	Aggregate General Election Expenditures for this Candidate - \$			
Full Name, Mailing Address and ZIP Code of Each Payer	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
National Direct Mail Services 4733 Bethesda Ave. Suite 0530 Bethesda, Maryland 20014	Durenberger for Senate Minnesota	Postage for direct mail services	10/2/78	5,610.00
	Aggregate General Election Expenditures for this Candidate - \$			
Full Name, Mailing Address and ZIP Code of Each Payer	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Holder, Kennedy, Dye & Bell 2020 21st Ave., South Nashville, Tenn. 37212	Martin for U. S. Senate Alabama	Media Advertising	10/2/78	50,000.00
	Aggregate General Election Expenditures for this Candidate - \$			
Full Name, Mailing Address and ZIP Code of Each Payer	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Automated Business Mail 5515 Livingston Road, S.E. Washington, D. C. 20021	Re-elect Baker Committee Tennessee	Postage	10/2/78	200.00
	Aggregate General Election Expenditures for this Candidate - \$			
Full Name, Mailing Address and ZIP Code of Each Payer	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Ruth Jones, Ltd. 123 E. 75th Street New York, New York 10021	Bell for Senate Committee New Jersey	Media Advertising	10/3/78	18,000.00
	Aggregate General Election Expenditures for this Candidate - \$			
GRAND TOTAL of expenditures this page (optional).....				0
TOTAL this page (last page this has no other entry).....				0

Send Statement Contributions  
 to: R. Lewis, P.L.V.  
 Washington, D.C. 20483

**STANDARD COORDINATED EXPENDITURES MADE BY  
 POLITICAL PARTY COMMITTEES OR DESIGNATED AGENTS  
 ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE  
 (2 U.S.C. 547 (d))  
 (Supporting Line 24, FEC Form 3)**

Page 0  
 For Line 24, FEC Form 3

(To be used only by Political Committees in the General Election)

Name of Political Committee as Filed

**National Republican Senatorial Committee - Expenditures**

Has your Committee been designated to make expenditures authorized by a political party committee?  YES  NO

If YES, name the candidate or candidates: **Republican National and/or Respective State Committees**

Full Name, Mailing Address and ZIP Code of Each Payer	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Martin for U. S. Senate P. O. Box 3403 Birmingham, Alabama 35205	Martin for U. S. Senate Alabama	Section 461 ? Contribution	10/6/78	\$ 17,000.00
Aggregate General Election Expenditure for this Candidate - \$				
Holder, Kennedy, Dye & Bell 2020 21st Ave., South Nashville, Tenn. 37212	Martin for U. S. Senate Alabama	Media Advertising	10/6/78	65,000.00
Aggregate General Election Expenditure for this Candidate - \$				
Woodward-McDowell & Associates 22 Battery Street Suite 404 San Francisco, Ca. 94111	Humphrey for Senate New Hampshire	Media Advertising	10/10/78	40,000.00
Aggregate General Election Expenditure for this Candidate - \$				
Eddie Mahe, Jr. 1212 16th Street, N. W. Washington, D. C. 20035	Humphrey for Senate New Hampshire	Reimbursement of Expenses & Political Consulting	10/10/78	1,500.50
Aggregate General Election Expenditure for this Candidate - \$				
Midwest Advertising 1034 West Third Street Davenport, Iowa 52802	Friends of Roger Jepsen Iowa	Media Advertising	10/10/78	25,000.00
Aggregate General Election Expenditure for this Candidate - \$				

TOTAL of enclosures this page (optional) ..... 0

TOTAL this period (see page 2 for line number only) ..... 5

72010152667  
72020152778



Form 700  
 Federal Election Commission  
 11 K Street, N.W.  
 Washington, D.C. 20543

**POLITICAL PARTY COMMITTEE FOR DEMOCRATIC CANDIDATES**  
**ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE**  
 (2 U.S.C. 4413a-1)  
 (Supporting Line 24, FEC Form 3)  
 (To be used only by Political Committees in the General Election)

Page 1 of 1  
 For Line 24, FEC Form 3

Name of Political Committee or Fund				
National Republican Senatorial Committee - Expenditures				
Has your Committee been designated to make coordinated expenditures by a political party committee? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO				
If YES, name the designating committee: Republican National and/or Respective State Committees				
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Atkinson Advertising Associates 5500 N. Western, Suite 101A Oklahoma City, Oklahoma 73118	Oklahomans for Bob Kaim Oklahoma	Media Advertising	10/17/78	\$ 25,000.00
Aggregate General Election Expenditure for this Candidate - \$				
Communication Specialists P. O. Box 1529 Austin, Texas 78767	Texans for Tower	Direct Mail Services	10/17/78	90,000.00
Aggregate General Election Expenditure for this Candidate - \$				
Ruth Jones, Ltd. 123 E. 75th Street New York, New York 10021	Bell for Senate Committee New Jersey	Media Advertising	10/19/78	40,000.00
Aggregate General Election Expenditure for this Candidate - \$				
Holder, Kennedy, Dye & Bell 2020 21st Ave., South Nashville, Tenn. 37212	Martin for U. S. Senate Alabama	Media Advertising	10/19/78	29,500.00
Aggregate General Election Expenditure for this Candidate - \$				
Xerox Corporation P. O. Box 96300 Chicago, Illinois 60693	Citizens for Percy Illinois	Office Equipment	10/19/78	326.40
Aggregate General Election Expenditure for this Candidate - \$				
SUBTOTAL of expenditures this page (if any):				\$
TOTAL this period (last page this line number only):				\$

73040152668  
 YR020150707





FEDERAL ELECTION COMMISSION

1155 E. NORTON AVE.  
WASHINGTON, D.C. 20463

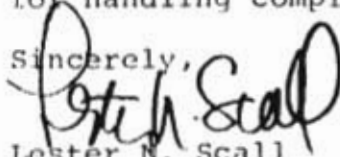
November 6, 1978

James Howard Stewart, Jr.  
3701 Knollwood Drive  
Anniston, Alabama 36201

Dear Mr. Stewart:

This is to acknowledge receipt of your complaint of November 3, 1978, alleging violations of the Federal Election Campaign laws. A staff member has been assigned to analyze your allegations. A recommendation to the Federal Election Commission as to how this matter should be handled will be made shortly. You will be notified as soon as the Commission determines what action should be taken. For your information, we have attached a brief description of the Commission's preliminary procedures for handling complaints.

Sincerely,

  
Lester N. Scall  
Assistant General Counsel

Enclosure

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Perkins  
The Deford

# Donald Stewart

## U.S. Senate

November 3, 1978

Office of the General Counsel  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D. C. 20463

807653

Dear Sir:

7 9 0 1 0 1 5 2 6 7 0

The Friends of Donald Stewart Committee, a political committee supporting the candidacy of Donald Stewart for the United States Senate, files this complaint alleging that the National Republican Senatorial Committee (NRSC) has violated the party spending limitations contained in section 441a (d) of the Federal Election Campaign Act. In the current general election campaign for U. S. Senate in Alabama, NRSC has expended \$194,700 on behalf of the Republican candidate Jim Martin, which is \$69,686.12 in excess of the limits under section 441a (d). This gross violation of the law by NRSC, which has resulted in the expenditure of thousands of illegal dollars in the Alabama Senate election, requires the Federal Election Commission's most urgent attention.

According to published FEC calculations, the national and state committees of a political party may each spend a maximum \$62,506.94 under section 441a (d) on behalf of a candidate for the United States Senate in Alabama. See Appendix A (with relevant figures underlined) attached to this complaint. Thus the Republican National Committee and the Alabama Republican State Committee may spend no more than a combined total of \$125,013.88 on behalf of Jim Martin. Yet between September 1, 1978 and October 19, 1978 the NRSC, acting as a designated agent of the national and state Republican committees, has spent \$194,700 in expenditures on behalf of Mr. Martin -- \$69,686.12 in excess of the legal limit. This violation is documented by NRSC's own reports to the FEC, filed October 10 and October 28, where these unlawful monies are recorded on Schedule F. \*/See appendix B and Appendix C,

\*/ Schedule F also confirms that the designated NRSC is proceeding on the theory that it may act as the designated agent of both the Republican National Committee and the Alabama Republican State Committee in making those 441a (d) expenditures.

P.O. Box 2274  
Anniston, Alabama 36201  
(205) 237-9311

2727 1/2 Seventh Avenue South  
Birmingham, Alabama 35233  
(205) 252-5204 (205) 252-5064

Office of the General Counsel  
Federal Election Commission  
November 3, 1978  
page two

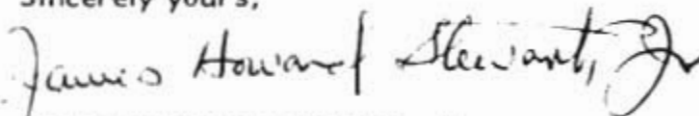
7 9 0 1 0 1 5 2 6 7 1

The Friends of Donald Stewart Committee further alleges that the Act does not authorize the NRSC to act as the designated agent of the Alabama Republican State Committee for the purpose of making section 441a(d) expenditures. Section 110.7(a)(4) of the FEC's regulations, together with the FEC's own Advisory Opinion 1976-108, make allowance only for an agency agreement under section 441a(d) between NRSC and the Republican National Committee, thereby enabling NRSC, as the agent for the National Committee, to spend a maximum \$62,506.94 on behalf of Mr. Martin. No legal grounds exist for a similar agency agreement between NRSC and the Alabama State Republican Committee -- but NRSC assumes nonetheless that it may enter into such an agreement and spend an additional \$62,506.94 on behalf of Mr. Martin. If the Commission concurs with the Friends of Donald Stewart that NRSC has misconstrued its authority under section 441a(d), and cannot act as agent for the State Committee, then NRSC has exceeded the lawful limit under that section by \$132,193.06.

The party spending allowed for under section 441a(d) is substantial, and should have been sufficient to satisfy the NRSC. Instead this committee has made a mockery of the limit contained in section 441a(d); it has unleashed a flood of funds well in excess of the lawful limit, an action which expresses this committee's disregard of the law, and which undermines prospects for a fair election to the United States Senate in Alabama.

This complaint is filed by me on behalf of Donald Stewart's candidacy for the United States Senate from Alabama.

Sincerely yours,



JAMES HOWARD STEWART, JR.  
3701 Knollwood Drive  
Anniston, Alabama 36201  
Telephone Number (205) 236-5367


Campaign Chairman

STATE OF ALABAMA )

JEFFERSON COUNTY )

Before the undersigned Notary Public, in and for the State of Alabama at large, personally appeared JAMES HOWARD STEWART, JR., who being known or made known to me and by me first duly sworn, on his oath stated that the facts stated in the above and foregoing complaint signed by him this day are true.

Given under my hand and seal this the 2<sup>nd</sup> day of November, 1978.

  
\_\_\_\_\_  
Notary Public

7 9 0 1 0 1 5 2 6 7 2

APPENDIX A

**PARTY SPENDING LIMITS FOR CONGRESSIONAL CONTESTS**

The Federal Election Commission has calculated the spending limitations for political parties for congressional candidates. The limits are effective for 1978. Back reference.— Law § 140.

**PARTY COORDINATED EXPENDITURE LIMITS — 1978**

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

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

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

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

**Senatorial:**

State Voting Age Population (VAP) x 50.02, plus the 1978 increase in the Consumer Price Index (CPI) of 22.9 percent; or \$24,580.00, whichever is greater. (See chart below.)

**Congressional:**

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

**PARTY SPENDING LIMITS FOR SENATE CANDIDATES**

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

State	VAP (in thousands)	1978 Party Spending Limitations
Alabama	2,543	562,506.94
Alaska*	258	24,580.00
Arizona	1,562	38,393.96
Arkansas	1,494	36,722.52
California	15,627	384,111.66
Colorado	1,828	44,932.24
Connecticut	2,238	55,010.04
Delaware*	407	24,580.00
Florida	6,219	152,863.02
Georgia	3,450	84,801.00
Hawaii	615	24,580.00
Idaho	574	24,580.00
Illinois	7,873	193,518.34
Indiana	3,690	90,700.20
Iowa	2,025	49,774.50
Kansas	1,664	40,901.12
Kentucky	2,402	59,041.16
Louisiana	2,609	64,129.22
Maine	756	24,580.00
Maryland	2,921	71,798.18
Massachusetts	4,166	102,400.28
Michigan	6,284	154,460.72
Minnesota	2,765	67,963.70
Mississippi	1,575	38,713.50
Missouri	3,417	83,989.86
Montana	523	24,580.00
Nebraska	1,095	26,915.10
Nevada*	439	24,580.00
New Hampshire	594	24,580.00
New Jersey	5,224	128,405.92
New Mexico	783	24,580.00
New York	12,879	316,565.82
North Carolina	3,864	94,977.12
North Dakota*	450	24,580.00
Ohio	7,484	183,956.72
Oklahoma	1,994	49,012.52
Oregon	1,695	41,663.10
Pennsylvania	8,508	209,126.64
Rhode Island	673	24,580.00
South Carolina	1,953	48,004.74
South Dakota	475	24,580.00
Tennessee	3,028	74,428.24
Texas	8,773	215,640.34
Utah	797	24,580.00
Vermont*	336	24,580.00
Virginia	3,631	89,249.98
Washington	2,589	63,637.82
West Virginia	1,313	32,273.54
Wisconsin	3,244	79,737.52
Wyoming	278	24,580.00
District of Columbia	505	12,290.00
Guam	49	12,290.00
Puerto Rico	2,010	12,290.00
Virgin Islands	59	12,290.00

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APPENDIX B

FEC FORM 3  
REVISED  
January 1978  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20543

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)

*hand delivered*  
11/25/78

*Notes: Committees authorized by a candidate to receive contributions and make expenditures in connection with a campaign must maintain separate records with respect to such election.*

1 National Republican Senatorial Committee-Contributions 5323 2 ID No. 000091009  
Name of Candidate or Committee (in full) Candidate Committee  
227 Massachusetts Ave., N. E.  
Address (number and street) 3  
Washington, D. C. 20002 Office Sought, State District (if applicable)  
City, State and ZIP Code  Check if address is different than previously reported Year of Election \_\_\_\_\_

4 Type of Report (check appropriate boxes)

April 10 Quarterly Report  Tenth day report preceding \_\_\_\_\_ election (primary, general or convention)  Termination Report  
 July 10 Quarterly Report or \_\_\_\_\_ in the State of \_\_\_\_\_  Amendment for \_\_\_\_\_  
 October 10 Quarterly Report  Thirtieth day report following \_\_\_\_\_ election (which report?)  
 January 31 Annual Report  \_\_\_\_\_ in the State of \_\_\_\_\_  
 Monthly Report \_\_\_\_\_ on \_\_\_\_\_ in the State of \_\_\_\_\_ (segment) (date)

This is a report to:  Primary Election  General Election  Primary and General  Other (specify: \_\_\_\_\_, 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>July 1</u> Through <u>September 30, 1978</u>		
6 Cash on hand January 1, 1978		\$ -0-
7 Cash on hand at beginning of reporting period	\$ 970,588.96	
8 Total receipts from line 10 (Add Subtotal Add lines 7 and 8 for Column A and lines 6 and 8 for Column B)	\$ 1,641,974.14	\$ 3,412,563.10
9 Total expenditures from line 25	\$ 1,200,000.00	\$ 2,000,000.00
10 Cash on hand at close of reporting period (Subtract line 9 from line 8)	\$ 1,412,563.10	\$ 1,412,563.10
11 Value of other items on hand to be liquidated (Attach schedule if any)	\$ _____	
12 Debts and obligations owed to the Committee/Candidate (Itemize all on Schedule C)	\$ 147,150.00	
13 Debts and obligations owed by the Committee/Candidate (Itemize all on Schedule C)	\$ _____	

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.  
Date: Oct. 10, 1978 Rodney A. Smith, Treasurer Rodney A. Smith  
(Date) (Typed Name of Treasurer or Candidate) (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 437j, see reverse side of form.

For further information, contact:  Federal Election Commission, 1325 K Street, N.W., Washington, D.C. 20543 or call 800-424-9530. Authored by GAO B-187620-1905061 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.

7902012717

3

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

NAME OF CANDIDATE OR COMMITTEE		REPORT COVERING THE PERIOD	
National Republican Senatorial Committee—Contributions		FROM: July 1	TO: September 30, 1978
RECEIPTS		Column A The Period	Column B Calendar Year-To-Date
16. Contributions from individuals including contributions in-kind			
(a) Itemized (see Schedule A)	\$	738,201.50	
(b) Unitemized	\$	810,063.64	
(c) Sales and collections included above			
Let the entry on Form Schedule D 15 _____			
(d) Subtotal of contributions from individuals	\$	1,548,265.14	\$ 3,211,812.32
19. Transfers from Political Committees			
(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)	\$	47,263.57	
(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	\$	47,263.57	\$ 153,167.81
18. Other Income			
(a) Itemized (see Schedule A)	\$	46,300.91	
(b) Unitemized	\$		
(c) Subtotal of other income	\$	46,300.91	\$ 46,300.91
17. Loans and Loan Repayments Received			
(a) Itemized (see Schedule A)	\$		
(b) Unitemized	\$		
(c) Subtotal of loans and loan repayments received	\$		\$
18. Refunds, Rebates, Returns of Deposits			
(a) Itemized (see Schedule A)	\$		
(b) Unitemized	\$	144.52	
(c) Subtotal of refunds, rebates, returns of deposits	\$	144.52	\$ 1,282.06
19. Total Receipts	\$	1,641,974.14	\$ 3,412,563.10
EXPENDITURES			
20. Operating Expenditures			
(a) Itemized (see Schedule B)	\$		
(b) Unitemized	\$		
(c) Subtotal of operating expenditures	\$		\$
21. Loans, Loan Repayments, and Contribution Refunds Made			
(a) Itemized (see 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)	\$	1,200,000.00	
(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	\$	1,200,000.00	\$ 2,000,000.00
23. Independent Expenditures (see Schedule E)	\$		\$
24. Coordinated Expenditures Made by Political Committees (2 U.S.C. 441a(d)) (itemize on Schedule F)	\$		\$
25. Total Expenditures	\$	1,200,000.00	\$ 2,000,000.00
NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES			
26. Total Receipts (from line 19)	\$		
27. Transfers In (from line 19)(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)	\$		

FORM 24  
 FEBRUARY, 1978  
 Federal Election Commission  
 235 K Street, N.W.  
 Washington, D.C. 20463

**ITEMIZED COORDINATED EXPENDITURES MADE BY  
 POLITICAL PARTY COMMITTEES OR DESIGNATED AGENTS  
 ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE  
 (2 U.S.C. 441a(d))  
 (Supporting Line 24, FEC Form 3)**

Page 1 of 2  
 For Line 24, FEC Form 3

(To be used only by Political Committees in the General Election)

Name of Political Committee in Full

**National Republican Senatorial Committee-Expenditures**

Has your Committee been designated to make coordinated expenditures by a political party committee?  YES  NO  
 If YES, name the designating committee: **Republican National and/or Respective State Committees**

Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Daniels & Associates, Inc. 400 Office Park Drive Birmingham, Alabama 35223	Martin for U.S. Senate Alabama	Media Advertising & Programming	9-1-78	25,000.00
	Aggregate General Election Expenditure for this Candidate - \$			
R. J. Sam & Associates 630 - 9th Avenue New York, New York 10030	Kansans for Kassebaum Kansas	Media Advertising	9-1-78	20,000.00
	Aggregate General Election Expenditure for this Candidate - \$			
Monarch Printing Corp. 1130 West Adams Street Chicago, Illinois 60607	Citizens for Percy Illinois	Printing services	9-5-78	1,849.00
	Aggregate General Election Expenditure for this Candidate - \$			
Romanek Golub & Company 8 South Michigan Ave. 625 N. Michigan Ave. Chicago, Illinois 60611	Citizens for Percy Illinois	Monthly rent for office space	9-5-78	1,487.56
	Aggregate General Election Expenditure for this Candidate - \$			
Bailey, Deardourff & Associates Suite #1120 733 - 15th St., N. W. Washington, D. C. 20005	Citizens for Percy Illinois	Media Advertising	9-5-78	10,000.00
	Aggregate General Election Expenditure for this Candidate - \$			

SUBTOTAL of expenditures this page (optional) ..... \$  
 TOTAL this period (last page this line number only) ..... \$

70020151317



Form 28  
 Party, 1978  
 Federal Election Commission  
 25 K Street, N.W.  
 Washington, D.C. 20543

**UNCOORDINATED EXPENDITURES MADE BY  
 POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S)  
 ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE  
 (2 U.S.C. 441a(d))  
 (Supporting Line 24, FEC Form 3)**

Page 9 of 15  
 For Line 24, FEC Form 3

(To be used only by Political Committees in the General Election)

Name of Political Committee in Full

**National Republican Senatorial Committee-Expenditures**

Has your Committee been designed to make coordinated expenditures by a political party committee?  YES  NO  
 If YES, name the designating committee: **Republican National and/or Respective State Committees**

Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Daniels & Associates 402 Office Park Drive Suite #110 Birmingham, Alabama 35223	Martin for U.S. Senate Alabama	Media Advertising	9-19-78	\$ 25,000.00
	Aggregate General Election Expenditure for this Candidate - \$			
Northwest Bell Telephone Company 1432 Soo line Building Minneapolis, Minnesota 55402	Durenberger for Senate Minnesota	Telephone service	9-19-78	3,500.00
	Aggregate General Election Expenditure for this Candidate - \$			
Shasteen for Senate 820 South 13th Street Lincoln, Nebraska 68508	Don Shasteen U.S. Senate Nebraska	Sec. 441 Contribution	9-20-78	6,000.00
	Aggregate General Election Expenditure for this Candidate - \$			
Paul F. Orgergard Greenbriar Apartments 10401 S. Cedar Lake Rd. Minnetonka, Minnesota 55343	Durenberger for Senate Minnesota	Political Consulting	9-20-78	1,500.00
	Aggregate General Election Expenditure for this Candidate - \$			
Thomas F. Horner Apt. #307 6300 York Ave., South Edina, Minnesota 55435	Durenberger for Senate Minnesota	Political Consulting	9-20-78	1,000.00
	Aggregate General Election Expenditure for this Candidate - \$			

SUBTOTAL of expenditures this page (optional) ..... \$  
 TOTAL this period (list page the line number only) ..... \$

7  
9  
0  
2  
0  
1  
5  
1  
3  
2  
5

Form 1233  
 Street Station Committee  
 28 K Street, N.W.  
 Washington, D.C. 20543

**NEEDED CANDIDATE EXPENDITURES BY  
 POLITICAL PARTY COMMITTEES OR ASSOCIATED AGENTS  
 ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE  
 (2 U.S.C. 441a(d))  
 (Supporting Line 24, FEC Form 3)**

For 22 of 23  
 For Line 24, FEC Form 3

(To be used only by Political Committees in the General Election)

Name of Political Committee in Full				
National Republican Senatorial Committee - Expenditures				
Has your Committee been designated to make coordinated expenditures by a political party committee? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO				
If YES, name the designating committee: <u>Republican National and/or respective State Committee</u>				
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Tom Horner Suite #164 8120 Penn Ave., South Minneapolis, Mn. 55431	Durenberger for Senate Minnesota	Consulting Services	9-29-78	\$ 3,000.00
Aggregate General Election Expenditure for this Candidate - \$				
Northwestern Bell Telephone Co. 1432 Soo Line Bldg. Minneapolis, Mn. 55402	Durenberger for Senate Minnesota	Telephone Services	9-29-78	2,371.52
Aggregate General Election Expenditure for this Candidate - \$				
Paul Overgaard Suite #164 8120 Penn Ave., South Minneapolis, Mn. 55431	Durenberger for Senate Minnesota	Consulting Services	9-29-78	4,500.00
Aggregate General Election Expenditure for this Candidate - \$				
Market Opinion Research 28 West Adams Detroit, Michigan 48226	Durenberger for Senate Minnesota	Telephoning Poll	9-29-78	8,850.00
Aggregate General Election Expenditure for this Candidate - \$				
Christopher D. Lord 5401 Westbard Ave. Apt. #1507 Bethesda, Md. 20016	Martin for U. S. Senate Alabama	Consulting Services	9-29-78	200.00
Aggregate General Election Expenditure for this Candidate - \$				

SUBTOTAL of expenditures this page (optional) ..... \$  
 TOTAL this period (last page this line number only) ..... \$

7902115-338



PEC FORM 3  
1-73 (Rev. 12/78)  
January, 1979  
Federal Election Commission  
1275 K Street, N.W.  
Washington, D.C. 20543

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

RECEIVED  
FEB 28 1979

(Except for Candidates or Committees Receiving Federal Matching Funds)

Please Committee authorized by a candidate to receive contributions and make expenditures in connection with more than one election to report on this separate reports with respect to each election.

1. National Republican Senatorial Committee 2. I.D. No. 00091068  
 Name of Candidate or Committee (in full) Contributions Candidate/Committee  
727 Massachusetts Ave., N.W.  
 Address (number and street) Washington, D. C. 20003 S 323  
 City, State and ZIP Code  Check if address is different than previously reported. Year of Election \_\_\_\_\_

3. Type of Report (check appropriate boxes):  
 April 10 Quarterly Report  Tenth day report preceding General election (primary, general or convention)  Termination Report  
 July 10 Quarterly Report on November 7 in the State of \_\_\_\_\_  Amendment for \_\_\_\_\_  
 October 10 Quarterly Report  Thirtieth day report following \_\_\_\_\_ election (primary, general or convention) (which report)  
 January 31 Annual Report  Monthly Report \_\_\_\_\_ on \_\_\_\_\_ in the State of \_\_\_\_\_  
 This is a report for  Primary Election  General Election  Primary and General  Other Special, (specify): \_\_\_\_\_

SUMMARY OF RECEIPTS AND EXPENDITURES  
(Figures may be rounded to nearest dollar.)

5. Covering Period	Column A This Period	Column B Calendar Year Total
<u>October 1 through October 21, 1978</u>		
6. Cash on hand January 1, 79		\$ _____
7. Cash on hand at beginning of reporting period	\$ 605,730.56	
8. Total receipts (from line 19)	\$ 353,823.77	\$ 3,455,803.02
(a) Subtotal (Add lines 7 and 8 for Column A and line 6 and 8 for Column B)	\$ 959,554.33	\$ 3,656,606.04
9. Total expenditures (from line 25)	\$ 800,000.00	\$ 3,502,647.56
10. Cash on hand at close of reporting period (Subtract line 9 from line 8a)	\$ 159,554.33	\$ 1,153,958.48
11. Value of contributed items on hand to be liquidated (Attach itemized list)	\$ _____	\$ _____
12. Debt and obligations owed to the Committee/Candidate (itemize all on Schedule C)	\$ 100,430.00	
13. Debt and obligations owed by the Committee/Candidate (itemize all on Schedule C)	\$ _____	

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.  
10/27/78 Rodney A. Smith Rodney A. Smith  
 (Date) (Typed Name of Treasurer or Candidate) (Signature of Treasurer or Candidate)

Note: Submission of false, inaccurate, or incomplete information may subject the person signing this Report to the penalties of 28 U.S.C. Section 472, or Section 485 for reverse side of form.

For further information, Contact: Federal Election Commission, 1275 K Street, N.W., Washington, D.C. 20543. Telephone: 800-424-9540. Form 3-79 (Rev. 12/78)

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

Any information reported herein may not be divulged for other use by any person for purpose of receiving contributions or for any other purpose.

73042152679  
7902015047

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

NAME OF CANDIDATE OR COMMITTEE National Republican Senatorial Committee - Contributions	REPORT COVERING THE PERIOD FROM: Oct. 1 TO: Oct. 23, 1974	
RECEIPTS	Column A This Period	Column B Calendar Year-To-Date
14. Contributions from Individuals (including contributions in-kind):		
(a) Itemized (use Schedule A) .....	\$ 180,989.50	
(b) Unitemized .....	\$ 162,263.45	
(c) Sales and collections included above: List by name on memo Schedule D (\$ _____)		
(d) Subtotal of contributions from individuals .....	\$ 343,252.95	\$ 3,455,400.00
15. Transfers from Political Committees:		
(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) .....	\$ 9,200.00	
(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 .....	\$ 9,200.00	\$ 162,367.82
16. Other Income:		
(a) Itemized (use Schedule A) .....	\$ .....	
(b) Unitemized .....	\$ .....	
(c) Subtotal of other income .....	\$ .....	\$ 46,300.91
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) .....	\$ 1,370.82	
(b) Unitemized .....	\$ .....	
(c) Subtotal of refunds, rebates, returns of deposits .....	\$ 1,370.82	\$ 2,652.00
19. Total Receipts .....	\$ 353,823.77	\$ 3,666,801.00
<b>EXPENDITURES</b>		
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) .....	\$ 800,000.00	
(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 .....	\$ 800,000.00	\$ 3,507,657.84
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 .....	\$ 800,000.00	\$ 3,507,657.84
<b>RECEIPTS AND EXPENDITURES, NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES</b>		
26. Total Receipts (from line 19) .....	\$ .....	\$ .....
27. Transfers In (from line 15(d)) .....	\$ .....	\$ .....
28. Net Receipts (Subtract line 27 from line 26) .....	\$ .....	\$ .....
29. Total Expenditures (from line 25) .....	\$ 800,000.00	\$ .....
30. Transfers Out (from line 22(a)) .....	\$ 800,000.00	\$ .....
31. Net Expenditures (Subtract line 30 from line 29) .....	\$ .....	\$ .....

72212152980



July 1978  
 Joint Election Committee  
 234 K Street, N.W.  
 Washington, D.C. 20488

**POLITICAL PARTY COMMITTEES OR DESIGNATED AGENTS  
 ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE  
 (2 U.S.C. 4614(d))  
 (Supporting Line 24, FEC Form 3)**

Page 1 of 2  
 For Line 24, FRS Form 3

(To be read only by Political Committees in the General Election)

730015268  
 7902015277

Name of Political Committee in Full				
<b>National Republican Senatorial Committee - Expenditures</b>				
For year Committee been assigned to make coordinated expenditures by a political party committee? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO				
If YES, name the designating committee: <b>Republican National and/or Respective State Committees</b>				
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Automated Business Mail 5515 Livingston Road, S.E. Washington, D. C. 20021	Citizens for Cochran Mississippi	Typing Services	10/2/78	\$ 1,069.74
	Aggregate General Election Expenditure for this Candidate - \$			
National Direct Mail Services 4733 Bethesda Ave. Suite #530 Bethesda, Maryland 20014	Durenberger for Senate Minnesota	Postage for direct mail services	10/2/78	5,610.00
	Aggregate General Election Expenditure for this Candidate - \$			
Holder, Kennedy, Dye & Bell 2020 21st Ave., South Nashville, Tenn. 37212	Martin for U. S. Senate Alabama	Media Advertising	10/2/78	50,000.00
	Aggregate General Election Expenditure for this Candidate - \$			
Automated Business Mail 5515 Livingston Road, S.E. Washington, D. C. 20021	Re-elect Baker Committee Tennessee	Postage	10/2/78	200.00
	Aggregate General Election Expenditure for this Candidate - \$			
Ruth Jones, Ltd. 123 E. 75th Street New York, New York 10021	Bell for Senate Committee New Jersey	Media Advertising	10/3/78	18,000.00
	Aggregate General Election Expenditure for this Candidate - \$			
<b>TOTAL of expenditures this page (optional):</b>				\$
<b>TOTAL this period (last page this line number only):</b>				\$

FD-302 (Rev. 5-22-73)  
 Federal Election Commission  
 200 H Street, N.W.  
 Washington, D.C. 20043

**ITEMIZED COORDINATED EXPENDITURES MADE BY  
 POLITICAL PARTY COMMITTEES OR DESIGNATED AGENTS  
 ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE  
 (2 U.S.C. 447a(d))  
 (Supporting Line 24, FEC Form 3)**

Page 0 of 23  
 For Line 24, FDC Form 3

(To be used only by Political Committees in the General Election)

Name of Political Committee in Full				
National Republican Senatorial Committee - Expenditures				
Has your Committee been designated to make coordinated expenditures by a political party committee? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO				
If YES, name the designating committee: Republican National and/or Respective State Committees				
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Martin for U. S. Senate P. O. Box 3406 Birmingham, Alabama 35205	Martin for U. S. Senate Alabama	Section 461 ? Contribution	10/6/78	\$ 17,000.00
Aggregate General Election Expenditure for this Candidate - \$				
Bolder, Kennedy, Dye & Bell 2020 21st Ave., South Nashville, Tenn. 37212	Martin for U. S. Senate Alabama	Media Advertising	10/6/78	65,000.00
Aggregate General Election Expenditure for this Candidate - \$				
Woodward-McDowell & Associates 22 Battery Street Suite 404 San Francisco, Ca. 94111	Humphrey for Senate New Hampshire	Media Advertising	10/10/78	40,000.00
Aggregate General Election Expenditure for this Candidate - \$				
Eddie Mahe, Jr. 1212 16th Street, N. W. Washington, D. C. 20036	Humphrey for Senate New Hampshire	Reimbursement of Expenses & Political Consulting	10/10/78	3,500.50
Aggregate General Election Expenditure for this Candidate - \$				
Midwest Advertising 1024 West Third Street Davenport, Iowa 52802	Friends of Roger Jepsen Iowa	Media Advertising	10/10/78	20,000.00
Aggregate General Election Expenditure for this Candidate - \$				
<b>TOTAL of expenditures this page (continued)</b>				<b>0</b>
<b>TOTAL this period (last page this line number only)</b>				<b>5</b>

7 2 0 3 1 5 2 6 8 2  
 7 2 0 2 0 1 5 2 7 7 8

Form 1028  
 Political Party Committee or Designated Agent  
 3 K Street, N.W.  
 Washington, D.C. 20043

**POLITICAL PARTY COMMITTEE OR DESIGNATED AGENT (A)  
 ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE  
 (2 U.S.C. 441a(d))  
 (Supporting Line 24, FEC Form 3)**

Page 1 of 2  
 Per Line 24, FEC Form 3

(To be used only by Political Committees in the General Election)

Name of Political Committee in Full  
**National Republican Senatorial Committee - Expenditures**

Has your Committee been designated to make coordinated expenditures by a political party committee?  YES  NO  
 If YES, name the designating committee: **Republican National and/or Respective State Committees**

Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Atkinson Advertising Associates 5500 N. Western, Suite 101A Oklahoma City, Oklahoma 73118	Oklahomans for Bob Kamm Oklahoma	Media Advertising	10/17/78	\$ 25,000.00
Aggregate General Election Expenditure for this Candidate - \$				
Communication Specialists P. O. Box 1529 Austin, Texas 78767	Texans for Tower	Direct Mail Services	10/17/78	90,000.00
Aggregate General Election Expenditure for this Candidate - \$				
Ruth Jones, Ltd. 123 E. 75th Street New York, New York 10021	Bell for Senate Committee New Jersey	Media Advertising	10/19/78	40,000.00
Aggregate General Election Expenditure for this Candidate - \$				
Holder, Kennedy, Dye & Bell 2020 21st Ave., South Nashville, Tenn. 37212	Martin for U. S. Senate Alabama	Media Advertising	10/19/78	29,500.00
Aggregate General Election Expenditure for this Candidate - \$				
Xerox Corporation P. O. Box 96300 Chicago, Illinois 60693	Citizens for Percy Illinois	Office Equipment	10/19/78	326.00
Aggregate General Election Expenditure for this Candidate - \$				
TOTAL of expenditures this page (optional)				\$
TOTAL this period (last page the line number only)				\$

7300152683  
 78020152707



2117 1/2 Seventh Avenue, South  
Birmingham, Alabama 35233



6 A10:00

Office of the General Counsel  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463



FEDERAL ELECTION COMMISSION

1125 K STREET N.W.  
WASHINGTON, D.C. 20461

THIS IS THE BEGINNING OF MUR # 820

Date Filmed 8/30/79 Camera No. --- 2

Cameraman SPC

7 9 0 4 0 1 5 2 6 8 5