

1125 K STREET NAV WASHINGTON, D.C. 20463

THIS IS THE END OF MUR #\_ 820 Date Filmed 8/30/79 Camera No. --- 2 Spc Cameraman



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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.

Sinceraly, 1.60

William C. Oldaker General Counsel

Enclosure:

Commission certification General Counsel's Report

3 SENDER Complete items 1, 2, and 3 Add your address in the RETURN TO ap reverse 1001 100 1 The following service is requested (check one). è Show to whom and date delivered. Show to whom, date, and address of delivery. 1977 RESTRICTED DELIVERY Show to whom and date delivered ... RESTRICTED DELIVERY RETURN RECEIPT Show to whom, date, and address of delivery \$. (CONSULT POSTMASTER FOR FEES) 2 ARTICLE ADDRESSED TO a mes 7 Schoener M 3. ARTICLE DESCRIPTION REGISTERED. REGISTERED NO | CERTIFIED NO. | INSURED NO. 2 S (Always obtain signature of addressee or agent) I have received the article described above SIGNATURE INSURED AND Addressee 0 Authorized agent STA. 4 Such Steet 4 H. DATE OF DELIVERY POSTAN C 5 ADDRESS/Complete only it requested/ CERTIFIED MAIL 0 6 UNABLE TO DELIVER BECAUSE CLERK'S #GPO 1977-0-249-595



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

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

ICIP

6/22/79

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,

William C. Oldaker General Counsel

Enclosure:

Commission certification



1325 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 Anneston, 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,

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William C. Oldaker General Counsel

Enclosure:

Commission certification General Counsel's Report



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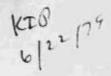
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PS Form x . SENDER Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse 1180 1. The following service is requested (check one). Show to whom and date delivered. A. Show to whom, date, and address of delivery 1977 RESTRICTED DELIVERY . Show to whom and date delivered. RESTRICTED DELIVERY RETURN RECEIPT Show to whom, date, and address of delivery \$ 0 (CONSULT POSTMASTER FOR FEES) In 2 ARTICLE ADDRESSED TO: mes H. Stewart m m N 3. ARTICLE DESCRIPTION REGISTERED REGISTERED NO. | CERTIFIED NO In INSURE NO. 19 ų (Always obtain signature of addre 0 0 I have received the article described above 0 SIGNATURE INSURED AND CERTIFIED MAIL Addressee Authorized agent -4 ena C DAT OF C 5 ADDRESS/Complete only if requested, ~ 6 UNABLE TO DELIVER BECAUSE QLE INI FKS 249-595





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

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Sincerely,

William C. Oldaker General Counsel

Enclosure:

Commission certification



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

		A
	MEMORANDUM TO	CHARLES STEELE
	FROM:	MARJORIE W. EMMONS T
C1	DATE:	JUNE 22, 1979
10	SUBJECT:	MUR 820 - Letters to Respondent and
m	00000011	Complainant - Memorandum
2		from OGC dated 6-20-79: Received in OCS 6-20-79, 2:37
10	The above-na	med document was circulated on a 24
-	hour no objection	basis at 11:00, June 21, 1979.
С	nour no-objection	basis at 11:09, June 21, 1974.
	The Commissi	on Secretary's Office has received
C	no objections to	the draft letters in relation to MUR 820
6	as of 12:30 this	date.
7		

## June 20, 1979

	FROM:	Elissa T.	Garr			
	SUBJECT:	MUR 820				
01					-	
10	Please h	ave the atta	ched Memo and	d letters dist	ibuted	
m	to the Commis	sion on a 24	hour no-obje	ection basis.		
2	Thank yo	u.				
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MEMORANDUM TO: Marge Emmons



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

'9 JUN 20 P 2: 37

June 20, 1979

MEMORANDUM TO:	THE COMMISSION
FROM:	WILLIAM C. OLDAKER
SUBJECT:	LETTERS TO RESPONDENT AND COMPLAINANT

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 STREELN W. WASHINGTON D.C. 20463

CERTIFIED MAIL RETURN RECEIPT REQUESTED

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

Re: MUR 820

Dear Mr. Stewart:

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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



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

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

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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 )

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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:

- 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.

- 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. Federal Election Commission Certification for MUR 820 (78) June 14, 1979

> 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

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Marjorie W. Emmons Secretary to the Commission

EXECUTIVE SESSION June 14, 1979



#### FEDERAL ELECTION COMMISSION

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

June 13, 1979

MEMORANDUM TO:

THE COMMISSION WILLIAM C. OLDAKE GENERAL COUNSEL

SUBJECT:

FROM:

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

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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.

#### BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of National Republican Senatorial Committee

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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:  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.

- 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 ( $S_1$ ) and \$122,985.30 to the Martin Campaign for the Allen Senate Seat ( $S_2$ ). 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  $S_1$ , as authorized by the Republican National Committee and the Alabama Republican Executive Committee, and \$123,000 in connection with  $S_2$ , as authorized.

-3-

#### 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.

Thus, it would appear that the Martin principal campaign committee for  $S_1$  could properly rely on AO 78-19 in its transfer of funds to the Martin principal campaign committee for  $S_2$ , 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  $S_1$  and  $S_2$  campaigns would seem to be materially different from transfers between two principal campaign committees.

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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. 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.

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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 <u>dated</u> 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.

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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

-6-

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,  $\underline{e.g.}$ , the purpose of the expenditure, the method of determining the allocation of the expenditure to  $S_1$  and  $S_2$ . Therefore, the Office of General Counsel recommends that the Commission approve and send the attached letter and interrogatories.

- 7 -

Finally, NRSC reports contributions pursuant to 2 U.S.C. § 441a(h) to both the  $S_1$  and  $S_2$  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 ( $S_1$ ) and \$17,300.00 as § 441a(h) contributions to candidate Martin in his race for the Allen Senate seat ( $S_2$ ). 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  $S_1$  campaign and another \$17,500 contribution by NRSC to candidate Martin in his  $S_2$  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:

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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:

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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: 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, <u>Id</u>. at S 4,158 (Remarks of Mr. Johnston) and decreased the limitation from \$20,000 to \$17,500, <u>Id</u>. 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, 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.

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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

-10-

meant to apply <u>per year</u> not per election. Thus, the rationale of the Fraser AO which required that contributions transferred from  $S_1$  to  $S_2$  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

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 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). 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.

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WILLIAM C. OLDAKE GENERAL COUNSEL

Attachments

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

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LAW OFFICES

JENKINS, NYSTROM & STERLACCI, P.C.

MERLE R JENKINS DENNIS H NYSTROM MICHAEL A STERLACCI CARL F. SCHIER JOSEPH E JANNETTA JAMES F. SCHOCHER STEPNEN J HITCHCOCX CHRIS M. PARFITT GARY J. NYSTROM RONALD A. DENEWETH TIMOTHY J MULLINS 2023 M STREET N.W. WASHINGTON D C 20038

SOHN B CONLAN

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January 10, 1979

INICHIGAN OFFICES

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

## Re: MUR 820

Dear Ms. Parkins:

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Enclosed you will find the affidavit of Mr. Rodney A. Smith, treasurer of the National Republican Senatorial Committee concerning expanditures 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 1978-13 to Congressman Fraser was studiourly 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 herato copies of assignment and allocation agreements of the National and State Party committees authorizing our acting as their agent in <u>each</u> 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

JTS: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.

September 5, 1978

To locit

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

Dear Bob:

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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

B3/bnp

cc:	Bob Moore .
	Ben Cotten
	Charlie Black
200	Jacquie Nystrom
	Matt Wirgau
*#:	Jay Banning

Bill Brock Chairman

N

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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 agant 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 \$52,000.

Eest personal regards.

Very truly yours,

BILL BROCK

BB/bnp

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

Dwicht D. Eisenhower Republican Cauter: 310 First Street Southaast. Wasz losten D.C. scoop (rep. to start



BIII Breck Chairman

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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 EROCK

BB/bnp

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

Dwight D. Eisenhower Ropublican Center: 310 First Street Southeast, Washington, D.C. 20003. (200) 414-5500.

Bill Breek Chairman

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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,

BROCK

EB/bnp

c:	Bob. Moora
	Ben Cotten
Q	Charlie Black
- 5	Jacquie Nystrom
	Jay Banning
	Kanny Klinge

Owight D. Disenhower Pepublican Contert 316 First Street Sportsport, West-ports D. C. Martin, mart 1992 11

William D. Harris, State Chairman Member for Alabama P.O. Bax 3315 Birminenam, Alabama 35035 (205) 332-5733

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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: '

- 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.
- Such amount of allowed expenditures under said provision has been computed tantatively by the Federal Election Commission as the amount of \$62,507.00.
- That State wishes to designate Senatorial its agent for the purpose of making such expanditures up to the amount of \$60,000.00.
- State agrees to file an allocation statement concerning the amount not assigned to Senatorial as required by the Federal Election Commission Regulation 110.7(2).
- 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 SON of the amount retained by State and a review of this agreement will occur at such time.
  - Senatorial agrees to make such expenditures in behalf of candidate, or if it is hny 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.

National Republican Senatorial Conmittee

Title

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Alabama Republican Executive Committee lliam D. Harris

Title Chairman

Dated Nus 22/ 1578 1978 at Washington D. C.

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

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

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

- 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.
- Such amount of allowed expenditures under said provision has been computed tentatively by the Federal Election Commission as the amount of \$62,507.00.
- That State wishes to designate Senatorial its acent for the purpose of making such expenditures up to the amount of \$62,000.00
- 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.
- Senatorial agrees to make such expenditures in behalf of candidate, or if itsis, any manner unable to make such expenditures, to promptly release and cancel said agoncy 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.

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National Republican Senatorial Committee

Alabama Republican Executive/Committee

Title Chairtan

Dated\_\_\_\_\_1978 at Pieringnam, Slapara

Polit I Financial Services of 901 L'Enfant Plazo Center, S. W. Washington, D.C. 20024

(202) 554-2205

Stan Hushaby eRa: [202] 554-4579

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Dederal Campulyn Dinancial 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 Coumittee.

As you know, Mr. Martin has changed candidacy for election to the United States Sentate, 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 \$28,453.63 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, When Hecker

Stan Huckaby

SH: trb

#### 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

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

Ι

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, 1973 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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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. Caid 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 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 miterials 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. 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.

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That he is informed and believes that all such transactions ware made property 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 (Sparhman seat) to the Martin Committee (Allen seat), the National Republican Senatorial Committee required a certified public accountant to make

VIII

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

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Further deponent saith not.

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Rodney A Smith Treasurse, National Republican Senatorial Committee

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

and Dorutes Notary, Public

My commission expires 5-3/ 23

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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 & 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 maters. 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

- 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.
- 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  $S_1$  campaign and part to the  $S_2$  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?
- Please submit any materials or documentation in support of your answers to the above questions.



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## March 18, 1976

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?

GRIFFIN. We will get some Mr. 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 nmendments 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 umendment 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.

Pro-Santa-Carta

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

Mr. GRIFFIN, I will have to admit it Lors 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 \$3065, sineuding Section 320(a)(2) of the bill, as follows:

## CONGRESSIONAL RECORD - SENATE

After "exceed \$5,000." add "except that the Republican or Democratic Sensiorial Cam paign 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 candidaten 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 com-mittee, 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 socalled 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 commit-tees, 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 hand: 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 carmarking 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 campalgn 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 CMr. GARNI, If the Senator will yield, I adCONGRESSIONAL RECORD - SENATE

vise 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 heu 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 Senstorial Campaign Committee"

Et cetera.

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The PRESIDING OFFICER. The question remains, where does the Senator with 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 Sematorial 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 ejections in which with candidates seek office during an ejection 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 eatmarked, and that is so stated.

Mr. CLARK Right.

Mr. JOHNSTON. It does not so 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 moncy 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 wellwhether 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. JOENSTON. 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 misunderatood 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 carlier, as a matter of fact. Mr. CLARK. It says:

Except that the Republican or Democratic Senatorial Campaign Committee, the Democratic National 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 schatorial and congressional campaign committees and the national committees.

Mr. JOHNSTON. That is precisely cor-

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 baby group or directly from the business group?

Mr. CLARK, I must say that I do not

## March 18, 1976

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, be-

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 enahrined 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 polities.

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 aggrerate 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.

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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 sets \$5,000 in three elections. I think on the average there will be two elections, and on some occasions three elections.

#### CONGRESSIONAL RECORD - SENATE

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 agprenate 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 impedi-

ment 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 Congrees. 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 furnel 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

estling more money into an incumbent's campaign, because this amendment does lover incumbents. For all those reasons, Mr. President, I hope the Senate will not adopt this amendment, because I think it 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 Mr. JOHNSTON, Mr. President, will

the Senator yield at that point so that I may ask for the yeas and nays?

MP. 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. Chuscit), the Senator from Indiana (Mr. HARTKE), and the Senator from Washington (Mr. JACKSON) are necessarily absent.

I further announce that, if present and voting, the Senator from Washing-

ton (Mr. JACKSON) would vote "yea." Mr. GRIFFIN. I announce that the Senator from North Carolina (Mr. HELMS) and the Senator from North Dakota (Mr. Yound) 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.

mays 30, as follows:

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	YEAS-64	
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Buckley	Hruska	Rebiend
Bird, Robbit C.	Hundleston	Schweiker
Conston	Humphrey	Scott, Hugh
Case	Inouse	Scott.
Cranston	Johuston	William L.
Curtus	Laxalt	Sparkinga
Dole	Leahy	Stennis
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Estaton	MACHINAGO	Symington
Silesthand.	Mansheld.	Tisft
Faithman	McCleilan	Talinadge
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So Mr. Joursion's amendment was 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. TAPT. 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", and the following: "or certi-fies to the Commission that he will not be an active candidate in the primary

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

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 hun 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. TAPT. 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 amondment was agreed to.

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

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

Mr. CRANSTON, Certainly,

MODIFICATION OF ORDER TO RE. PORT SENATE RESOLUTION 400

Mr. MANSFIELD. If I may have the attention of the Senate, I ask unaumous consent that the order of the Senate mandating the Senate Rules Committee to report Senate Resolution 400 estab-lishing 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 simultane-ously 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 fur-ther 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, BYRE, 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 DUPDOSES

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

Mr. EARTLETT I ask unanimous consent that Don Comman 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 fustering the exploration of space through space science and the de-velopment of space technology and space inw; and

Whereas the International Astronautical Federation and its amiliated organizations, the International Academy of Astronautica and the International matitute of Space Law, represent the world's leading authorities in astronautica, the space sciences and space law; and

Whereas the International Astronautical Whereas the International Astronautical Federation will hold its 27th Congress in Anaheim, California, during 1978, the Bieen-tennial Year of our Nation, in recognition of the vital contribution made by the United States to the scientifi, technical and legal wealth of our civilization; and Whereas the host creanizations for this 27th Congress, to be called the "IAF "76" Congress, are the American Institute of Astronautical and Astronautics, the American Astronautical Society, the Acrospace Medical

Astronautical Society, the Aerospace Medical Association, the New York Cardiological So-ciety and the Rocker Research Institute, Inc.; and

Whereas the "IAF '70' Congress will be attended by hundreds of people who belong to the International Astropautical Federation's aminated organizations and member societies

from many nations; and Whereas the "IAP "7" Congress will con-duct 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 Bicen-

tennial Administration recognizes the "IAP 76" Congress as a significant contribution to the Herson 76 theme of the national Bicen-

"76" Congress as a significant contribution to the Horron "76 theme of the national Bicen-ternial commemoration and Whereas the International Astronautical Federation. Its affiliated organizations, and its member societies represent considerable hope and promise to the world for the con-tinued advancement of man's accomplish-ments in the fields of a romautics, the space lange and score has much accomplishmenters, and space law, such accomplish-ments having brought a better life to all humanity; and

Whereas the International Astronautical Pederation strongly supjorts man's explora-tion of space and the pioper use of the en-vironment of space in order to help fulfill man's greatest apprations and meet his vital needs on earth: Now, threfore, 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 Pederation and its affiliated organizations for relecting the United States as the location for its 27th Congress in recognition of the Ricentennial of the United States: and comments the host organizations of the United States for sponsoring the Congress. Size. 2. The Secretary of the Senate shall transmit a suitably ensembed copy of this

resolution to the International Astronautical Federation.

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

#### FEDERAL ELECTION CAMPAIGN ACT AMENDMENT'S OF 1976

The Senate continued with the conideration 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 substi-Lute 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. HATTHELD, Mr. MANSFIELD, Mr. HUGH SCOTT, Mr. ROBERT C. BYRD and Mr. GAITFIN 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 Scort, Senator ROLERT 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 vesterday.

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 commissionthe 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 include 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 organizatious 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 oll 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 it.

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 aggre-nate more than \$20,000 in an election year\_

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

### S 4158

CONGRESSIONAL RECORD - SENATE

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 quarum, 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 guorum call be rescinded.

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

Mr. JOHNSTON, Mr. President, I have an amendment which I send to the desk and sak 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 ano, 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 compaign committees could give to a candidate from \$5,000 per election to \$20,000 per year. After that amendment had paysed-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 mailing this applicable to the House committees would have the untoward and unwanted effect of raising expectations of House Members way beyond reslity. 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 walt 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 inischievous 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" "Democratic Congressional Commitor tee" or "Republic Congressional Cominitice" 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 number 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 surgest 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 samended 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 rate 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 BERKLEY BEDELL. 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 be 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 prohibited 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. PACRWOOD. 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. CLARE. Well, the reacon 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 striken out?

Mr. CLARE. 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 meand 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 physics.

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. PACEWOOD. 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.

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### May 3, 1976

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 decirion last December.

We have, moreover, dour 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, ike a corporation, may solicit contributions from the nonorganized 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.

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

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 enraged 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

## CONGRESSIONAL RECORD - HOUSE

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. WIOGINS. 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 thisthe 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 antibusiness, and it will be very strongly pro-Democratic and very strongly proincumbent. 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 till 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 Ľ

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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 leas 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 gentlewoman 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 Iadiana, 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. Havs), 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 aggreatte 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 committee 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 Campaisn 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, 1 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 committe 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 centleman 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. Ontry).

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

# May 3, 1976

# CONGRESSIONAL RECORD - SENATE

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 Flection Commission expanded and more varied civil enforcement powers. As these are described in detail in the conference report 1 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. candidate for Federal office, any BDY 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 aw in any form other than as a rule or regulation pursuant to the congressional Orview procedures of the act. General rulemaking was never intended to be the function of the advisory opinion process. Congress in this respect, and requires the "Commission to conform their prior ad-

visory opinions to these provisions within 90 days of enactment. The conference bill prohibits opinions

The conference but promises optimizes 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

fon 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 conferent, 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 mercente limitation on all contributions in a calendar year in existing law. A multicandidate political committee.

A minimum 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 Camparatic Committees and the inflored committee of a political party to make a contribution of \$20,000 to a candidate for the Sonate in a calendar year was amended to reduce this amount to \$17,002...

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 re-sponsibilities. 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 periniting 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 associstion 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 ratained, 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, inequitics, 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 expediä

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

Chairman Chnnon. We can strike the word "otherwise." Mr. Brademas. That is what I am saying, otherwise it's redundant.

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

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

Page 49 there has been a substitute proposed.

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

Mr. Wiggins. All right.

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

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

Is that a total per year or is it still \$5,000 per 1 election for the other committee? 2 Chairman Cannon. It does not affect the right of other 3 committees to be able to give whatever we have provided under 4 thelaw. 5 Mr. Wiggins. Per election. 6 Chairman Cannon. Per election. Only applies to the 7 specified committees under the statute. 8 Mr. Wiggins. If the Senators are clear that there is no 9 ambiguity then I don't have any problems. 10 Chairman Cannon. We are satisfied. 11 Mr. Wiggins. All right. 12 Senator Scott. You said the \$17,500 is per election 13 200? 14 Chairman Cannon. No. Per calendar year. 15 Senator Pell. Mr. Chairman, does this mean per election, 16 or I mean per candidate per year? What if there is a caucus 17 or primary election? 18 Chairman Cannon. Which one are you talking about? 19 Senator Pell. Expenditure, the \$17,500: 20 Chairman Cannon. No, it says per year, per calendar 21 year in which the election is held is what it says in the 22 statute. 23 Senator Pell. If there are two elections it would still 24 be limited? 25

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Chairman Cannon. Still limited to that figure. Somebody had a proposal here for this rewrite of the conference report on page 49 and 50 starting at the bottom. Doos everybody have a copy of that looking at it?

Mr. Shoener. There are several different ones." Chairman Hays. Will you distribute the documents?

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

Does everybody have the copy now so they can read it? Mr. Dent. Look at the top of page 3, membership organizations, it does not include or was intended to include a trade association. Most trade associations are made up of corporations. That is what they are doing, is representing corporations within that particular trade's activities.

Chairman Hays. Where is that?

Mr. Mathis. I don't think so.

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

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

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### BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

MUR 820 (78)

National Republican Senatorial) Committee )

## 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 MUR 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. §44la(h) by making contributions to James Martin of Alabama during calendar year 1978 in exess 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

maryone W. Emmons

Marjorie W. Emmons Secretary to the Commission



# FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO: FROM: DATE: SUBJECT: CHARLES STEELE MARJOPIE W. EMMONS MUSIC JUNE 11, 1979

AMENDED AGENDA FOR THE EXECUTIVE SESSION OF TUESDAY, JUNE 12, 1979.

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.

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 \$20

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

79 JUN 8 All: 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:  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.

 Agreements with the Alabama Republican Executive Committee authorizing NRSC to make § 441a(d) expenditures in connection with the Martin campaign -

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- (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 ( $S_1$ ) and \$122,985.30 to the Martin Campaign for the Allen Senate Seat ( $S_2$ ). 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  $S_1$ , as authorized by the Republican National Committee and the Alabama Republican Executive Committee, and \$123,000 in connection with  $S_2$ , 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

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[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. § 44la(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  $S_1$  could properly rely on AO 78-19 in its transfer of funds to the Martin principal campaign committee for  $S_2$ , 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  $S_1$  and  $S_2$  campaigns would seem to be materially different from transfers between two principal campaign committees.

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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.

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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 <u>dated</u> 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, <u>e.g.</u>, the purpose of the expenditure, the method of determining the allocation of the expenditure to  $S_1$ and  $S_2$ . Therefore, the Office of General Counsel recommends that the Commission approve and send the attached letter and interrogatories.

-7-

Finally, NRSC reports contributions pursuant to 2 U.S.C. § 441a(h) to both the  $S_1$  and  $S_2$  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 ( $S_1$ ) and \$17,300.00 as § 441a(h) contribution to candidate Martin in his race for the Allen Senate seat ( $S_2$ ). 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  $S_1$  campaign and another \$17,500 contribution by NRSC to candidate Martin in his  $S_2$  campaign?

The provision reads:

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(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:

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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.

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

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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: Second, the amendment to S.3065 proposed by Senator Johnston and previously adopted by the Senate is modified to <u>clarify that contributions</u> 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, <u>Id</u>. at S 4,158 (Remarks of Mr. Johnston) and decreased the limitation from \$20,000 to \$17,500, <u>Id</u>. 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, 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.

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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 meant to apply <u>per year</u> 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 inopposite 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

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 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).

-11-

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

1. Le WILL

GENERAL COUNSEL

Attachments

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



901:1

LAW OFFICES

JENKINS, NYSTROM & STERLACCI, P.C.

WASHINGTON D C. 20036

(202) 293.2505

January 10, 1979

MERLE R JENKINS DENNIS H. NYSTROM MICHAEL A STERLAGGI GARL F. SCHIER JOSEPH E JANNETTA JAMES F. SCHORNER STEPHEN J. HITCHCOCK CHRIS M. PARFITT GARY J. NYSTROM RONALD A. DENEWETH TIMOTHY J. MULLINS

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

JOHN & CONLAN

10 15999 WEST TWELVE MILE ROAD SOUTHFIELD, MICHIGAN 48070 (313) 559-2828

Re: M U R 820

#### Dear Ms. Perkins:

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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 1978-13 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. Schooner

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Enclosures

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

Padjock

September 5, 1978

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

Dear Bob:

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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
1.0	Jacquie Nystrom
	Matt Wirgau
11	Jay Banning

Republican National

Committee

Bill Brock Chairman

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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 umount 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

B3/bnp

cc:	Bob Moore	,
	Ben Cotten	
2	Charlie Black	
+ 1-	Jacquie Nystrom	
	Jay Banning	



BIII Breck 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

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C

cc:	Bob Moore
	Ben Cotten
	Charlie Black
	Jacquie Nystrom
1.000	Jay Banning
	Kenny Klinge
. *	-

Dwight D. Eisenhower Ropublican Center: 310 First Street Southeast, Washington, D.C. 2003. (202) 484-0510.



# Republican National Committee

Bill Breck Chairman

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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

BE/bnp

c:	Bob. Moora
	Ben Cotten
243	Charlie Black
(B)	Jacquie Nystrom
	Jay Banning
	Konny Klinge

Dwight D. Disenhower Republican Center: 310 First Study Southeast, Washington, D.G. Study, (non-sector, 11





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

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Committee

#### 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:

- 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.
- 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 expanditures 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 Cormission Regulation 110.7(c).
- 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 50% of the amount retained by State and a review of this agreement will
  occur at such time.
  - Senatorial agrees to make such expenditures in behalf of candidate, or if it is kny 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 offective when signed by both parties.

Mu 22 Dated 1978 at Washington 20.

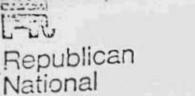
National Republican Senatorial Committee

1975 at E ..... Birmingaum,

Alabama Republican Executive Committee By Harris 11:an D.

Title Chairman

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

Committee

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

The National Republican Senatorial Committee, hereinafter known as "Senatorial", acress 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.
- Such arount of allowed expenditures under said provision has been computed 2. 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 Semamorial 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 BC% 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 itsis. any manner unable to make such expenditures, to promptly release and cancel said aconcy and reassign such allocated amount to State.

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

Datud 1978 at Washington, D. C.

National Republican Senatorial Committee

Alabama Republican Executive/Committee

Title Chairman

Dated 1973 at Birmingnam, Alabara

Poling I Financial Services 901 L'Enfant Plaza Center, S. W. Washington, D.C. 20024

(202) 554-2205

Stan Huckaby eRes: 1202/ 554-4679

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Dederal Campaign Dinancial 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.

Is you know, Mr. Martin has changed candidacy for election to the United States Sentate, 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 Heckeby





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

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

Ι

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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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 recorls, 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.

### VIT

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.



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.

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#### 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.

х

That he is informed and believes that all such transactions were made properly and in accordance with Commission Advisory Opinion 1973-19 "Contributions to Two Campaigns by One Candidate" made in connection with the Praser 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



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.

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1.13 1.

Rodney A Smith Treasurer, National Republican Senatorial Committee

syorn to and subscribed before me a notary public in and for the District of Columbia this <u>II</u> day of January 1979.

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Notary , Public My commission expires 5.3/. 23

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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 & 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 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 oppotunity 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

- 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.

Relate this expenditure to the general election.

- 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  $S_1$  campaign and part to the  $S_2$  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?
- Please submit any materials or documentation in support of your answers to the above questions.

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# March 18, 1976

Several Senators addressed the Chair Mr. ORIFFIN. 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 unantinous consent that further reading of the sinendment be dispensed with.

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

(Pursuant to an order entered later today's proceedings, Mr. GRIFFIN'S in 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?

GRIFFIN. We will get some Mr. 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 proceed-

ed 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 53065, amending Section 320(a)(2) of the bill, as follows:

#### CONGRESSIONAL RECORD - SENATE

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\_ipcreases 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 speclal 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 socalled 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 OML. GARN). If the Senator will yield, I ad-

#### CONGRESSIONAL RECORD - SENATE

vise 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 contribule at any time amounts not exceeding \$20,000 to candidates for Congress with respect to any or all of the elections in which and candidates seek office, during an election prest.

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 conditious 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 moncy 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.

Surcely 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 wellwhether for Republican or Democrat.

The Senator makes no restriction on where that moncy 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. JOENSTON. 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 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 scantorial 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 lo 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 pri-inary, 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

### March 18, 1976

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.

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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 wets \$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

CONGRESSIONAL RECORD - SENATE

\$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.

T 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 conressional 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 impedi-

ment 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 slandard 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 Congrees. 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

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So Mr. JOHNSTON'S amendment was nureed to

Mr. CANNON. The President, I move reconsider the vote by which the to 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 "ballot", add the following: word 'or certities 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 Grittin 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 aprecing 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.

March 18, 1976

Mr MANSFIELD Mr. President, will the Senator yield?

Mr. CRANSTON, Certainly,

MODIFICATION OF ORDER TO RE-PORT SENATE RESOLUTION 400

Mr. MANSFIELD. If I may have the attention of the Sepate, I ask unanimous consent that the order of the Senate mandating the Senate Rules Committee to report Senate Resolution 400 estab-lishing 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 simultane-ously to the Committee on the Judiciary and to the Committee on Rules: That the Committee on the Judiciary make its recommendations on Senate

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 fur-ther 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. MI 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, BYRL 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 Senstor.

#### 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 DUTDOSC

Mr. CRANSTON. I yield to the Senator from Oklahoma for a unanimous-cousent 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 con-Scherntion.

The PRESIDING OFFICER The an.endment will be stated.

time in saying that State committees, county committees, and other committera 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?

setting more money into an incumbent's

compaign, because this amendment does

lavor incumbents. For all those reasons,

Mr. President, I hope the Senate will not

adopt this amendment, because I think

it 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

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 undered, 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. ('nuscu), the Senator from Indiana (Mr. HARTKE), and the Senator from Washington (Mr. Jackson) are necessarily abernt.

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. Yound) 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. tury 30, as follows:

[Rollcall Vote No. 85 Leg ]

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March 24, 1976

societies devoted to fostering the exploration of space through space science and the de-velopment of space schoology and space Inw; and

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

Whereas the International Astronautical Whereas the International Astronautical Federation will hold its 27th Congress in Anaheim, California, diring 1978, the Bicen-tennial Year of our Nation, in recognition of the vital contribution made by the United States to the scientifi, 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 Aeronautical Society, the American Statutical Society, the Aerona Micro

Astronautical Society, he Aerospace Medical Association, the New York Cardiological So-ciety and the Rocket Research Institute, Inc.; and

Whereas the "IAF '70" Congress will be attended by hundreds of people who belong to the International Astronautical Pederation's aminated organizations and member societies

from many nations; and Whereas the "IAP "7" Congress will con-duct sessions and present papers in all areas duct sessions and present papers in all areas of astronautics, and the space sciences, and space law thereby advalcing and strengthen-ing international cooperation and under-standing in these critical areas of science, technology, and law; an

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

Whereas the International Astronautical Federation, its adiliated organizations, and its member societies represent considerable hope and promise to the world for the con-tinued advancement of man's accomplish-ments in the fields of accomputies, the space sciences, and space law a better life to all ments having brought humanity; and

Whereas the International Astronautical Whereas the International Astronatical Federation strongly supports man's explora-tion of space and the proper use of the en-vironment of space in order to help fulfill man's greatest apprations 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 Octuber 10 through October 16, 1976;

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 com-mends the host organizations of the United States for sponsoring the Congress. Stc. 2. The Secretary of the Senate shall transmit a suitably ensembed copy of this resolution to the International Astronautical

resolution to the International Astronautical Federation.

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

#### FEDERAL ELECTION CAMPAIGN ACT AMENDMENTS OF 1975

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?

492

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 8, 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. GAIFFIN 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 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 vesterday.

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 commissionthe number of commissioners was erpanded 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 include the reporting requirement proposed by Senator Packwoop 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 equitubly 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 8. 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 it.

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 aggrestate more than \$20,000 in an election year ....

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

### S 4150

#### CONGRESSIONAL RECORD - SENATE

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

Mr. PACEWOOD. 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 itouse of Representatives," On page 35, beginning with line 21, strike

On page 35, beginning with line 21, strike the words "the Democratic National Congressional Committee, the National Republican Caugressional 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 senatoris! 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 colleacues 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 Commit-" or "Republic Congressional Com-Lee mittee" 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:

PROMIBITION 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 rate 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 BERKLEY BEDELL. 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 be 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 prohibited 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. PACEWOOD. 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 hawful 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 meand 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 abread

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, dour 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 nonorganized 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.

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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

# CONGRESSIONAL RECORD - HOUSE

permission to revise and extend his re-

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. WIOGINS. 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 antibusiness, and it will be very strongly pro-Democratic and very strongly proincumbent. 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 campat support it.

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 skrictly 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 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 gentlewoman from New Jersey (Mrs. FERWICK).

(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 Iadiana, 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 Michi-

gan (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. Havs), 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 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. 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 committee 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, 1 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 committe 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 Wiscottsin (Mr. OBEY).

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

#### May 3, 1976

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 parced 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 haw prescribed by the Commission as a rule or regulation, to a specific factual situation. Section 108(a) of the conference bill prohibits the Com-

mission from proposing general rule of hw in any form other than as a rule or regulation pursuant to the congressional eview 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 ad-

visory 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 opin-

on is issued.

The conference substitute amends the **Cprocedure 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 candldate. 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 Repubhean or Democratic Senatorial Campater Committees and the national committee of a political party to make a contribution of \$20,000 to a candidate to the Senate m a calendar year was amended to reduce this amount to \$17,002...

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 pertaming 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 periniting 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 misociation 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 commuttees were ratained, 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 Flection 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 expediMr. Brademas. Again, I am seeing this for the first time, but isn't that redundant? But for these subsections these expenditures would be covered by --

Chairman Chnnon. We can strike the word "otherwise." Mr. Brademas. That is what I am saying, otherwise it's redundant.

Chairman Cannon. The second paragraph beyond that is not starting with: "It is the conferees' intent." That was just to define the intent of the calendar year, this being a short year.

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

Page 49 there has been a substitute proposed.

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

Chairman Cannon. For calendar year.

Mr. Wiggins. All right.

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

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

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, doos 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 Poll. 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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Chairman Cannon. Still limited to that figure. Somebody had a proposal here for this rewrite of the conference report on page 49 and 50 starting at the bottom. Does everybody have a copy of that looking at it? Mr. Shoener. There are several different ones. Chairman Nays. Will you distribute the documents? Chairman Cannon. The conference substitute that I had here was one that I understand was worked out by the staff of the House and the Senate, is that correct? On the Majority side. The other substitute was worked out by staffs on the Minority side. Suppose we go through the Majority staff substitute and take a look at it and then we will procoved to discuss the Minority.

Does everybody have the copy now so they can read it? Mr. Dont. Look at the top of page 3, membership organizations, it does not include or was intended to include a trade association. Most trade associations are made up of corporations. That is what they are doing, is representing corporations within that particular trade's activities.

Chairman Hays. Where is that?

Mr. Mathis. I don't think so.

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

Chairman Hays. It says it isn't intended to include, 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
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.

# 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.

### BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

National Republican Senatorial Committee MUR 820 (78)

#### 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:  Letters from the Republican National Committee authorizing NRSC to make \$441a(d) expenditures in connection with the Martin campaign -

- 2 -

(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.

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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 \$44la(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  $(S_1)$  and \$122,985.30 to the Martin Campaign for the Allen Senate Seat  $(S_2)$ . 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 \$44la(d) expenditure limits to the two Martin races. Thus, NRSC contends that it could spend a maximum of \$122,000in connection with \$1, as authorized by the Republican National Committee and the Alabama Republican Executive Committee, and \$123,000 in connection with S2, 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).

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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.

- 3 -

Thus, it would appear that the Martin principal campaign committee for  $S_1$  could properly rely on AO 78-19 in its transfer of funds to the Martin principal campaign committee for  $S_2$ , 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  $S_1$  and  $S_2$  campaigns would seem to be materially different from transfers between two principal campaign committees.

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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.

- 4 -

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.

- 5 -

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).

- 6 -

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, <u>e.g.</u>, the purpose of the expenditure, the method of determining the allocation of the expenditure to  $S_1$  and  $S_2$ . Therefore, the Office of General Counsel recommends that the Commission approve and send the attached letter and interrogatories.

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#### RECOMMENDATIONS

 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). 3. Approve and send the attached letter and interrogatories.

16 Date

140 William C. Oldaker

General Counsel

Attachments 1. NRSC Response

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2. Letter to Respondent and Interrogatories



LAW OFFICES

#### JENKINS, NYSTROM & STERLACCI, P.C.

MERLE R. JENKINS DENHIS H NYSTROM MICHAEL A. STERLACCI CARL F. SCHIER JOSEPH E JANNETTA JAMES F. SCHOZNER STEPHEN J. HITCHCOCK CHRIS M. PARFITT GARY J. NYSTROM RONALD A. DENEWETH TIMOTHY J. MULLINS

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

2033 M STREET. N.W. WASHINGTON D C. 20036

12021 293.2505

January 10, 1979

EDWAND & RYDER MICHIGAN OFFICES

... OF COUNSEL

JOHN B CONLAN

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13 15999 WEST TWELVE MILE ROAD SOUTHFIELD, MICHIGAN 46076 (313) 559-2828

Re: M U R 820

#### Dear Ms. Perkins:

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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

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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.

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September 5, 1978

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

Dear Bob:

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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
1.1	Jacquie Nystrom
	Matt Wirgau
1.1	Jay Banning

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BIII Brock Chairman

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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
100	Charlie Black
4.	Jacquie Nystrom
	Jay Banning



Bill Brock Chairman

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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 .

Rest personal regards.

Very/truly yours,

BILL BROCK

BE/bao

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

Dwight D. Eisenhower Ropublican Center: 310 First Street Southeast, Washington, D.C. 20003. (202) 484-0520.



Bill Breck Chairman

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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

Jacquis Nystrom Jay Banning Kanny Klinge





William D. Harris, State Chairman Member for Alabama P.O. Box 3315 Birmingham, Alabama 05205 (205) 322-5733

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#### 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:

- 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.
- Such amount of allowed expenditures under said provision has been computed tentatively by the Federal Election Commission as the amount of \$62,507.00.
- That State wishes to designate Senatorial its agent for the purpose of making such expanditures 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(2).
- 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 50% of the amount retained by State and a review of this agreement will occur at such time.
  - 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.

1578 Dated Jul 221 1978 at Washington 9 D.

National Republican Senatorial Consittee

Title

1975 at Birmingana, Alubama.

Alabama Fepublican Executive Committee By William D. sarris

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Title Chairman



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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:

- 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.
- Such amount of allowed expenditures under said provision has been computed tentatively by the Federal Election Commission as the amount of \$62,507.00.
- That State wishes to designate Senatorial its agent for the purpose of making such expenditures up to the amount of \$62,000.00
- 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 60% of the amount retained by State and a review of this agreement will occur at such time.
- Senatorial agrees to make such expenditures in behalf of candidate, or if itsis 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.

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Alabama Republican Executive/Committee

Title Chairman

Dated\_\_\_\_\_1978 at Birmingnam, Alabama Polital Financial Services

Washington, D.C. 20024

(202) 554-2206

Stan Huckaby Ru: [202] 554-4619

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Pederal Campulyn Dinancial 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.

Is you know, Mr. Martin has changed candidacy for election to the United States Sentate, 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 \$25,458.63 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, Johan Heckery

Stan Huckaby

SH: tab

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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

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In

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

Ι

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, 1973 in the amount of \$16,493.27 as is shown in our internal records, a copy of which is attached as Exhibit A.



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.

IV

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.

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#### VII

That in such capacity he supervised and directed the expenditure 'v, 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. 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.

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11.

Rodney A Smith Treasurer, National Republican Senatorial Committee

CONTRACTOR OF CONTRACTOR

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

ance ortela

Notary Public My commission expires 3-3/- 23

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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.

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#### 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.

х

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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#### 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 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

#### INTERROGATORIES - SCHOENER - MUR 820

- 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.

Relate this expenditure to the general election.

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- 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  $S_1$  campaign and part to the  $S_2$  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?
- Please submit any materials or documentation in support of your answers to the above questions.

	*ORIGIN	SIS REFERRAL UPDATE
DATE	Office of General Counsel	ANALYST <u>Dug Greevy</u> TEAM CHIEF <u>Peggy Sims</u> <u>Peggy Sim</u>
THROUGH:	ATTENTION: Kathy Perkins STAFF DIRECTOR	COMPLIANCE REVIEW

••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)

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- 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.
- 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.



### Chairman, Oregon

#### MEMBERS

Hovered H. Baher, Jr. ; ten. vm. John H. Chaler, B. L. vm. Barry Goldwater, Aria. vm. Derin G. Hatch, Utah vm. B. J. Horpshawe, Calif. Van. H. John Heims III, Press. Nes. Gautes McC. Mathias, Jr., Md. vm. Hartens Schmitt, N. M. vm. Richard S. Echweiter, Press. Vm. Richard S. Bafford, Vermont Vm. Mahert T. Bafford, Vermont Ven. Mitting, R. Young, N. Dah.

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## National Republican Senatorial Committee

### '79 MAR 15 PM 12:16

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,

A Saute

Rodney A. Smith Treasurer

RAS:lec Enclosures

#### DETAILED MMARY OF RECEIPTS AND EXPENDITURES (Page 2, FEC FORM 3)

			T COVERING THE P	
Rep	oublican Senatorial Committee-Expenditures	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):			ALCO RECTOR MAN
	(a) Itemized (use Schedule A)	5	*************	
	(b) Unitemized	5	************	And a laster and a second and
	(c) Sales and collections included above:			and the second
	List by event on memo Schedule D (S )	1.		1 5
	(d) Subtotal of contributions from individuals			
15.	(a) Funds from affiliated/authorized committee (Itemize on Schedule A	1		A CARLES AND A CARLES AND A CARLES
	regardless of amount).	s	·····	
	(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)	5		They are the second as the second second
	(d) Subtotal of transfers in and contributions in-kind from political committees			s
16.	Other Income		CONTRACTOR OF THE OWNER	The second se
	(a) Itemized (use Schedule A)			
	(b) Unitemized	(1) (27.5)		
-	(c) Subtotal of other income	\$	and the second	S
17.	Loans and Loan Repayments Received:			
	(a) Itemized (use Schedule A)			
-	(b) Unitemized			S
18.	(c) Subtotal of loans and loan repayments received			3
20.	Refunds, Rebates, Returns of Deposits: (a) Itemized (use Schedule A)	s		
	(b) Unitemized			
-	(c) Subtotal of refunds, rebates, returns of deposits			s
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-20.	Operating Expenditures:	SSERIET:	NUMER OF A	
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C	(b) Unitemized	S		
	(c) Subtotal of operating expenditures	5		S
21.	Loans, Loan Repayments, and Contribution Refunds Made:			The second states 142 and the
	(a) Itemized (use Schedule B)			
T	(b) Unitemized			
	(c) Subtotal of loans and loan repayments made and contribution refunds Transfers Out to Political Committees:	5		S
22.	(a) To affiliated/authorized committee (Itemize on Schedule B regardless			
	of amount).			The second second second
	(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	s	1,988.69	
	(d) Subtotal of transfers out	s		S BANK
23.	Independent Expenditures (use Schedule E)	5		\$
24.	Coordinated Expenditures Made by Political Committees (2 U.S.C. 441a(d))		1.000	
	(Itemize on Schedule F)	0 s	and a second second	5
25.	Total Expenditures	5		s ·
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	NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES	1.2	48	
26.	Total Receipts (from line 19)			
27.	Transfers In (from line 15(a))	S		
28.	Net Receipts (Subtract line 27 from line 26)	s		
29.				
	Transfers Out (from line 22(a))			•
31.	Net Expenditures (Subtract line 30 from line 29).	S		1

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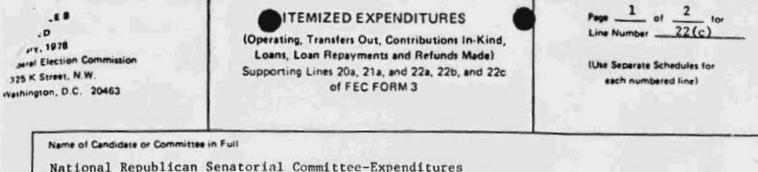
#### ITEMIZED EXPENDITURES

(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

Page 2 of 2 for Line Number \_22(c)

(Use Separate Schedules for each numbered line)

Full Name, Mailing Address and ZIP Code Steven Saunders Nat'l.Republican Senatorial Comm. 227 Massachusetts Ave., N.E. Washington, D. C. 20002	Media Consulting Expenditure for: Primary XGeneral Other	June '78	Amount of each expend ture this period \$ 15.00
Washington, D. C. 20002	Typist.Clerical assistance Expenditure for: Primary XXGeneral Dother	Date (month, day, year) June 178	Amount of each expend ture this period 58,50
	Particulars of Expenditure In-Kind Contribution-Reynolds for U.S. Senate-Rhode Island Fee - Campaign School Expenditure for: Primary & General Other	Date (month, day, year) 7-28-78	Amount of each expend ture this period 20.00
	Particulars of Expenditure In-Kind Contribution-Reynolds for U.S. Senate-Rhode Island Fee - Campaign School Expenditure for: Primary XMGeneral Other	Date Imonth, day, year) 7-28-78	Amount of each expering ture this period 20,00
Washington, D. C. 20002	Particulars of Expenditure In-Kind Contribution-Re-elect Thurmond Committee-So. Carolina Typing/Clerical assistance Expenditure for: Primary XXGeneral Other	Date (month, day, year) a June '78	Amount of each expend ture this period 30,00
Full Name, Mailing Address and ZIP Code Tony Payton 1127 Independence Ave., S. E. Washington, D. C. 20003	Particulars of Expenditure In-Kind Contribution-Shasteen for Senate - Nebraska Political Consulting Expenditure for: Primary XMGeneral DOther	Date (month, day, year) July '78	Amount of each expend ture this period 75.00
1127 Independence Ave., S. E. Washington, D. C. 20003	Particulars of Expenditure In-Kind Contribution-Simpson for Senate - Wyoming Political Consulting Expenditure for Primary & General Other	Date (month, day, year) July '78	Amount of each expend ture this period
	Particulars of Expenditure In-Kind Contribution - Helms for Senate - North Carolina <u>Air Travel</u> Expenditure for Primary D General Other	Date (month, day, year) July '78	Amount of each extend ture this period 181.00



Full Name, Mailing Address and ZIP Code Christopher D. Lord 5401 Westbard Avenue Apt. #1507 Bethesda, Maryland 20016	Particulars of Expenditure In-Kind Contribution-Baxter for Senate - Delaware Research Services Expenditure for:	Date (month, day, year) June '78	Amount of each expend ture this period \$ 250.00
Full Name, Mailing Address and ZIP Code Christopher D. Lord	Particulars of Expenditure In-Kind Contribution-Venema	Date (month, day, year)	Amount of each expend ture this period
5401 Westbard Avenue Apt. #1507 Bethesda, Maryland 20016	for Senate - Delaware Research Services Expenditure for: DPrimary XIGeneral Other	June '78	250.00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date imonth,	Amount of each expend
Christopher D. Lord 5401 Westbard Avenue	In-Kind Contribution-Friends of Roger Jepsen - Iowa	day, year)	ture this period
Apt. #1507 Bethesda, Maryland 20016	Research Services	June '78	280.00
Full Name, Mailing Address and ZIP Code	Primary XGeneral Other Particulars of Expenditure	Date (month	Amount of each expend
Christopher D. Lord 5401 Westbard Avenue	In-Kind Contribution-Jacobsen for Senate-New Hampshire	day, yearl	Amount of each external ture this period
Apt. #1507 Bethesda, Maryland 20016	Research Services	June '78	46.67
	Primary XXGeneral Other		
Full Name, Mailing Address and ZIP Code Christopher D. Lord	Particulars of Expenditure In-Kind Contribution-Masiello	Date (month, day, year)	Amount of each expend ture this period
5401 Westbard Avenue Apt. #1507 Bethesda, Maryland 20016	for Senate - New Hampshire Research Services Expenditure for	June '78	46.66
Full Name, Mailing Address and ZIP Code	Primary MGeneral Other Particulars of Expenditure	Date (month,	Amount of each expend
Christopher D. Lord 5401 Westbard Avenue	In-Kind Contribution-Humphrey for Senate - New Hampshire	day, year)	ture this period
Apt. #1507 Bethesda, Maryland 20016	Research Services Expenditure for	June '78	46.67
	Primary XXGeneral Other	Daved	Am
Full Name, Mailing Address and 21P Code James Schoener Jenkins, Nystrom & Sterlacci, P.	Particulars of Expenditure In-Kind Contribution-Committee	Date (month, day, year)	Amount of each expend ture this period
2033 M Street, N. W. Washington, D. C. 20036	Logal Services Expenditure for:	June '78	400.00
Full Name, Mailing Address and ZIP Code	Primary XXGeneral Other -	Date (month,	Amount of each excend
Communications Corporation of America	In-Kind contribution-People for Boschwitz - Minnesota	day, year)	ture this period
#1 Direct Marketing Plaza Boston, Virginia 22713	Printing services Expenditure for Primary Di General Other	June '78	219.19
SUBTOTAL of expenditures this page (optional).	Primary Di General Other	OTAL	\$ 1,539.19
	1110 3011		
TOTAL this period (last page this line number only).			s

LE F 1978 Election Commission Street, N.W. on, D.C. 20463	shown ITEMIZ POLITICAL ON BEH	are memo items only and a on Line 20(a) as expendit COORDINATED EXPENDE PARTY COMMITTEES OR DE HALF OF CANDIDATES FOR F (2 U.S.C. 441a(d)) (Supporting Line 24, FEC F	TURES DE BY SIGNATED AGENT(S) FEDERAL OFFICE	Page <u>1</u> For Line 24,	of 2 FEC Form 3
Name of Political Commit				-	
		rial Committee-Expenditure ke coordinated expenditures by a political p			
If YES, name the designat	ting committee Re	epublican National and/or	Respective State Com	mittees	D NO
Full Name, Mailing Addre of Each Pay	rss and ZIP Code	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date imonth, day, year)	Amount
All-In-One Trave 600 Pennsylvania Washington, D. (	a Ave., S.E	Roger Jepsen United States Senate Towa	AIT Travel	July '78	\$ 157.0
		Aggregate General Election Expenditure for this Candidate - S			
Full Name, Mailing Addre of Each Pay	and the second	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
All-In-One Trave 600 Pennsylvania	el a Ave.,S.E.	Thad Cochran United States Senate	2423		
Washington, D.C.	. 20003	Mississippi	Air Travel	July '78	157.
1		Aggregate General Election Expenditure for this Candidate - S	C 75 9 21-712		
Full Name, Mailing Addres of Each Pay	이번 경험에 비행하는 방법에서 가지 않는다.	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date imonth, day, year)	Amount
All-In-One Trave 600 Pennsylvania Washington, D.C.	a Ave., S.E.	Rudy Boschwitz United States Senate Minnesota	Air Travel	July '78	157.
		Aggregate General Election Expenditure for this Candidate S	· · · · · · · · · · · · · · · · · · ·		
Full Name, Mailing Addre of Each Pay		Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
James Schoener Jenkins,Nystrom 2033 M Street, N Washington, D. C	N. W.	United States Senate South Dakota Aggregate General Election Expenditure	ユリン ニノー・ Legal Services	July '78	200.
Full Name, Mailing Addre	as and ZIP Code	for this Candidate S Name of Federal Candidate Supported,	Particulars of Expenditure	Date (month,	Amount
of Each Pay		State, District & Office Sought		day, year)	
James Schoener Jenkins, Nystrom Sterlacci, P. C 2033 M Street, N Washington, D. C	C. N. W.	Bob Griffin United States Senate Michigan Aggregate General Election Expenditure	Legal Services	June '78	. 600.
		for this Candidate - S		L	
SUBTOTAL of exceeding	and the same include	onal)	MENO.	CULUTOTAL	\$ 1,271.

ITEMI POLITICAL ON BE	ZECOORDINATED EXPENDI L PARTY COMMITTEES OR DE HALF OF CANDIDATES FOR F (2 U.S.C. 441a(d)) (Supporting Line 24, FEC F	MITTEES OR DESIGNATED AGENT(S) DIDATES FOR FEDERAL OFFICE U.S.C. 441a(d)) Ing Line 24, FEC Form 3)		Page _2_ of _2_ For Line 24, FEC Form 3	
ttee in Full	and the second se				
				ONO	
ting committee:	Republican National and/or	r Respective State Co		JNU	
ess and ZIP Code	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Denditure	Date (month, day, year)	Amount	
m & C. N. W. C. 20036	Bob Griffin United States Senate Michigan Aggregate General Election Expenditure for this Candidate - S	Legal Services	June '78	\$ 1,600.0	
ess and ZIP Code yee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount	
m & C. N. W. C. 20036	John Tower United States Senate Texas Aggregate General Election Expenditure for this Candidate - S	Legal Services	June '78	1,200.0	
ess and ZIP Code	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount	
m & C. N. W. C. 20036	Larry Pressler United States Senate South Dakota Aggregate General Election Expenditure	42G Legal Services	June '78	400.0	
ns and ZIP Code	Name of Federal Candidate Supported,	Particulars of Expenditure	Date (month,	Amount	
	State, District & Office Sought Aggregate General Election Expenditure		day, years		
ess and ZIP Code	for this Candidate - \$ Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount	
	Aggregate General Election Expenditure		Sec.		
Contract of the second			4		
	for this Candidate - \$	MEMO SIL	DIFOTAL	\$3,200.0	
	ITEMIZ POLITICAL ON BEI (To Itel in Full Itel in Full Itel in Full Itel in Full Itel in Senat in designated to ma tring committee ess and ZIP Code yee m & C. N. W. C. 20036 ess and ZIP Code yee m & C. N. W. C. 20036 ess and ZIP Code yee	ITEMIZE COORDINATED EXPENDI POLITICAL PARTY COMMITTEES OR DE ON BEHALF OF CANDIDATES FOR F (2 U.S.C. 441a(d)) (Supporting Line 24, FEC F Ito be used only by Political Committees in the ittee in Full Dilcan Senatorial Committee-Expenditure in designated to make coordinated expenditures by a political pring committee Republican National and/or state, District & Office Sought m & Bob Griffin C. 20036 Aggregate General Election Expenditure for this Candidate - S ms and ZIP Code Name of Federal Candidate Supported, yee State, District & Office Sought m & John Tower C. United States Senate Texas C. 20036 Aggregate General Election Expenditure for this Candidate - S ms and ZIP Code Name of Federal Candidate Supported, yee State, District & Office Sought m & John Tower C. United States Senate Texas C. 20036 Aggregate General Election Expenditure for this Candidate - S ms and ZIP Code Name of Federal Candidate Supported, yee State, District & Office Sought M & Larry Pressler United States Senate State, District & Office Sought M & Larry Pressler C. United States Senate State, District & Office Sought M & Larry Pressler C. 20036 Aggregate General Election Expenditure for this Candidate - S ms and ZIP Code Name of Federal Candidate Supported, State, District & Office Sought Aggregate General Election Expenditure for this Candidate - S ms and ZIP Code Name of Federal Candidate Supported, State, District & Office Sought Aggregate General Election Expenditure for this Candidate - S ms and ZIP Code Name of Federal Candidate Supported, State, District & Office Sought	ITEMIZE COORDINATED EXPENDITURES 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) Itee in Full Contrast Coordinated expenditures by a political periv committee? In designated to max coordinated expenditures by a political periv committee? In designated to max coordinated expenditures by a political periv committee? In designated to max coordinated expenditures by a political periv committee? In designated to max coordinated expenditures by a political periv committee? In designated to max coordinated expenditures by a political periv committee? In designated to max coordinated expenditures by a political periv committee? In designated to max coordinated expenditure by a political periv committee? In designation of Pederal Candidate Supported, Periculars of Expenditure for this Candidate - S and ZIP Code Name of Federal Candidate Supported, Periculars of Expenditure for this Candidate - S and ZIP Code Name of Federal Candidate Supported, Periculars of Expenditure for this Candidate - S and ZIP Code Name of Federal Candidate Supported, Periculars of Expenditure for this Candidate - S and ZIP Code Name of Federal Candidate Supported, Periculars of Expenditure for this Candidate - S and ZIP Code Name of Federal Candidate Supported, Periculars of Expenditure for this Candidate - S and ZIP Code Name of Federal Candidate Supported, Periculars of Expenditure for this Candidate - S and ZIP Code Name of Federal Candidate Supported, Periculars of Expenditure for this Candidate - S and ZIP Code Name of Federal Candidate Supported, Periculars of Expenditure for this Candidate - S and ZIP Code Name of Federal Candidate Supported, Periculars of Expenditure for this Candidate - S and ZIP Code Name of Federal Candidate Supported, Periculars of Expenditure for this Candidate - S	ITEMIZE COORDINATED EXPENDITURES MEE 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)         To be used only by Political Committees in the General Election         Item 24, FEC Form 3)         (2 U.S.C. 441a(d)) (Supporting Line 24, FEC Form 3)         Item 24, FEC Form 3)         Item 24, FEC Form 3)         (2 be used only by Political Committees in the General Election)         Item 50         Item 50         Optimized Committees and colspan="2">Optimized Committee         Name of Federal Candidate Supported.         Particular of committees and colspan="2">Optimized Committees and colspan="2">Optimized Committee         Name of Federal Candidate Supported.         Particular of Expenditure for this Candidate - 5         Optimized General Election Expenditure for this Candidate - 5         Name of Federal Candidate Supported.         Particular of Expenditure for this Candidate - 5         Optimized General Election Expenditure for this Candidate - 5         Approprie General Election Expenditure for this Candidate - 5         Approprie General Election Expenditure for this Candidate - 5         Approprie General Election	



#### Senator Bob Packwood Chairman, Oregon

#### EMBERS

ten, Howard H. Baker, Jr., Tenn. ten, John H. Chaler, R. L. ten, Burry Gobbwster, Arin. ten, Orrin G. Hatch, Utah ten, B. L. Hayakawa, Cailf. ten, S. L. Hayakawa, Cailf. ten, Charles Her, Mathian, Jr., Md. ten, William V. Rech., Jr., Del. ten, Marrison Schmitt, N. M. ten, Richard S. Schweiker, Pron. ten, Robert T. Stafford, Vermont ten, Milon R. Young, N. Dak.

Treasury A. Smith

# National Republican Senatorial Committee

'79 MAR 15 PM 12: 16

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 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, Smith

Rodney Å. Smith Treasurer

RAS:lec Enclosures

A CANDIDATE OR COMMIT SUPPORTING CANDIDATE(S) F NOMINATION OR ELECTION TO FEDER	OR NAL OFFICE	
	t in connection with more the	n one election must maintain
lican Senatorial Committee-	C00027466	
committee (in full) Expenditures	Philippine and a second s	didate/Committee
rest) 3	Office Sought, State/District	if applicable)
e Check if address is different than p	reviously reported.	Year of Election
teport [primary, general or eport on in the State of y Report Thirtieth day report following Report [primary, general August on in the State of (month) (date)	r convention)	Termination Report Amendment for: (which report) Other (special, runoff, etc.)
ust 1 Through _August 31, 1978	Column A This Period	Column B Calendar Year-To-Date
ng of reporting period	s	S           Rearge Total and
	S	
ved by the Committee/Candidate (itemize all on Schedule C).	s 45,000.00	
nined this Report and to the best of my knowledge and be Rodney A. Smith, Treasurer (Typed Name of Treasurer or Candidate) erroneous, or incomplete information may subject the person signi-	Lodner Bignature	Treasurer or Candidate
	REPORT OF RECEIPTS AND EXPENSION A CANDIDATE OR COMMIT SUPPORTING CANDIDATE(S) F NOMINATION OR ELECTION TO FEDER 'IExcept for Candidates or Committees Receiving Feder the by a candidate to receive contributions and make expenditures in respect to each election. Lican Senatorial Committee- 2 committee (in full) Expenditures tts Ave., N. E. 2 C. 20002 (c) Check if address is different than p export for the commerce of the property of the property general of (orimary, general of (orimary, general of propert on in the State of (fate) Thirtieth day report following (month) on in the State of (figures may be rounded to nearer (figures may be rounded to nearer) (figures may be rounded to nearer)	REPORT OF RECEIPTS AND EXPENDITURES         SUPPORTING CANDIDATE (S) FOR         NOMINATION OR ELECTION TO FEDERAL OFFICE         Itexept for Candidates or Committees Receiving Federal Matching Funds)         Report of candidates or Committees Receiving Federal Matching Funds)         Itexept for Candidates or Committees Receiving Federal Matching Funds)         Itex of a candidates or Committee Receiving Federal Matching Funds)         Itex of a candidates or Committee Receiving Federal Matching Funds)         Item of a candidates or Committee Receiving Federal Matching Funds)         Committee In connection with more that the presend futures in connection with more that the present of a candidate segenditures in connection with more that the present of the sought, State/District (Candidate for receive convention)         Item of the sy report preceding in the State of interviously reported.         Item of dev report preceding in the State of interviously reported.         Item of inthe State of interviously reported.         Item of inthe State of interviously report or convention)         Item of inthe State of interviously report or convention)         Item of inthe State of interviously report or convention)         Item of inthe State of interviously report or convention)         Item of inthe State of interviously report or convention)

ANE OF CANDIDATE OR COMMITTEE National		T COVE MIG THE P	
wpublican Senatorial Committee-Expenditures	FROM:	August 1	TO: August 31, 197
RECEIPTS		Column A This Period	Column B Calendar Year-To-Date
6. Contributions from Individuals (including contributions in-kind):			
(a) Itemized (use Schedule A).		* * * * * * * * * * * * * * * *	- Million and a second
(c) Sales and collections included above:			18. 28. 19. 19. 18 miles
List by event on memo Schedule D (\$ )			
(d) Subtotal of contributions from individuals	5		5
5. Transfers from Political Committees: (a) Funds from affiliated/authorized committee (Itemize on Schedule A			Marker and the state
regardless of amount).			
(b) Funds from other committees (Itemize on Schedule A regardless of amount)			A STATE OF A
(c) Contributions in-kind from political committees			A State of State of State of State
(Itemize on Schedule A regardless of amount)		***********	
<ul> <li>(d) Subtotal of transfers in and contributions in-kind from political committees, .</li> <li>Other Income:</li> </ul>			5
(a) Itemized luse Schedule A)	5		A STATE OF A
(b) Unitemized			All and a start of the
(c) Subtotal of other income	5		5
Loans and Loan Repayments Received:     (a) Itemized (use Schedule A).			A David States
(b) Unitemized			The second se
(c) Subtotal of loans and loan repayments received.			5
B. Refunds, Rebates, Returns of Deposits:			
(a) Itemized (use Schedule A)			
(b) Unitemized (c) Subtotal of refunds, rebates, returns of deposits	. S		5
	- 15 TO 10	Contraction of the second	the second second second
Total Receipts	S	Character as the	\$
EXPENDITURES			and and a second second
0			
Operating Expenditures:     (a) Itemized (use Schedule B)			
(b) Unitemized			
C (c) Subtotal of operating expenditures			\$
Loans, Loan Repayments, and Contribution Refunds Made			1
(a) Itemized (use Schedule B)	\$		Anna Antheradaria
(b) Unitemized			s
Transfers Out to Political Committees:		Dallo Hand South and	
(a) To affiliated/authorized committee (Itemize on Schedule B regardless	10.000		
of amount).			a start -
N(b) To other committees (Itemize on Schedule B regardless of amount)	S	* * * * * * * * * * * * * *	A CONTRACTOR OF A CONTRACT
(c) Contributions in-kind to other committees (Itemize on Schedule B regardless of amount)	5	4,263.22	A CARLON AND A CARLO
(d) Subtotal of transfers out			5
I. Independent Expenditures luse Schedule El.	5		5
. Coordinated Expenditures Made by Political Committees (2 U.S.C. 441a(d))			
(Itemize on Schedule F) Memo Tatal - \$ 1,673.82			S
i. Total Expenditures			s 100
	5.50	1	
RECEIPTS AND EXPENDITURES, NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES			
NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES	1.00		
NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES			
NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES			
NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES Total Receipts (from line 19) Transfers in (from line 15(a))	5		
NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES	s		
NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES Total Receipts (from line 19) Transfers In (from line 15(a)) Net Receipts (Subtract line 27 from line 26)			

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DETAILED SUMMANT OF RECEIPTS AND EXPENDITURES

7

0 Lery. 1978 -deral Election Commission 125 K Street, N.W. vehington, D.C. 20463

#### TEMIZED EXPENDITURES

AUgust

Operating, Transfers Out, Contributions In-Kind, Loans, Loan Repay...ents 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) for

IUse Separate Schedules for each numbered line)

Name of Candidate or Committee in Full

National Republican Senatorial Committee-Expenditures

			and the second se	
Commo Ame #1 D: Bosto	Name, Mailing Address and ZIP Code nunications Corporation of erica Direct Marketing Plaza ton, Virginia 22713	Perticulars of Expenditure In-Kind Contribution-Griffin for Senate - Michigan Computer work Expenditure for: Primary Ø General O Other	Date (month, day, year) 8/21/78	Amount of each expenditure this period
Unit Dept P. O	Name, Mailing Address and ZIP Code ed Airlines . 745711 D. Box 36022M .sburgh, Pennsylvania 15250	Particulars of Expenditure In-Kind Contribution-Helms for Senate - North Carolina <u>Air Fare</u> Expenditure for: DPrimary @General DOther	Bate (month, day, year) 8/7/78	Amount of each expenditure this period
Unito Dept P. O 'Pitts	Name, Mailing Address and ZIP Code ced Airlines . 745711 D. Box 36022M sburgh, Pennsylvania 15250	Particulars of Expenditure In-Kind Contribution - Boschwitz for Senate - <u>Minnesota - Air Fare</u> Expenditure for D Primary D General DOther	Date Imonth, day, year) 8/7/78	Amount of each expendi- ture this period
Jenk: 2033 Wash:	Name Mailing Address and ZIP Code tins, Nystrom & Sterlacci, P.C. 3 M Street, N. W. hington, D. C. 20036	Particulars of Expenditure	Date (month, day, year) 8/21/78	Amount of each expenditure this period
Feder 2900	arme, Mailing Address and ZIP Code eral Express Corporation ) South Eads Ington, Virginia	Particulars of Expenditure In-Kind Contribution-Pressler for Senate - South Dakota <u>Express delivery service</u> Expenditure for D Primary D(General D Other	Date (month, day, year) 8/4/78	Amount of each expend ture this period 26.31
Roger 230 (	arme, Mailing Address and ZIP Code er Ailes & Associates Central Park South York, New York 10019	Particulars of Expenditure In-Kind Contribution-Reynolds for Senate - Rhode Island Media Critique Expenditure for Primary @General DOther	Date (month, day, year) 7/12/78	Amount of each expend ture this period 1,187.50
Full Na	lame, Mailing Address and ZIP Code	Particulars of Expenditure  Expenditure for.  Primary General Other	Date (month) day, year)	Amount of each expend ture this period
Full Na	ame, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for:	Date (month, day, year)	Amount of each expend ture this period
SUBT	OTAL of expenditures this page (optional).	Primary General Other		s

1978 Liection Commission Inret, N.W. on, D.C. 20463		PARTY COMMITTEES OR DE IALF OF CANDIDATES FOR F (2 U.S.C. 441a(d)) (Supporting Line 24, FEC F be used only by Political Committees in th	Page <u>1</u> of <u>1</u> For Line 24, FEC Form 3		
Name of Political Committee in		undal Committee-Expanditur			17.5
	and the second se	e coordinated expenditures by a political p			ONO
		epublican National and/or			
Full Name, Mailing Address and of Each Payee	ZIP Code	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Communications Corp of America #1 Direct Marketing Boston, Virginia 2	Plaza	Howard Baker United States Senate Tennessee Aggregate General Election Expenditure for this Candidate - \$	2/12 () Computer Work	8/7/78	\$ 185.0
Full Name, Mailing Address and of Each Payee	ZIP Code	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
Jenkins, Nystrom & Sterlacci, P. C. 2033 M Street, N. W Washington, D. C.		John Tower United States Senate Texas	2AC G Legal Services	8/21/78	1,308.8
and a second second second second		for this Candidate \$	Alexandra States		C
Full Name, Mailing Address and of Each Payee	ZIP Code	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expanditure	Date limonth, day, year)	Amount
Jenkins, Nystrom & Sterlacci, P. C. 2033 M Street, N. W Washington, D. C.		Larry Pressler United States Senate South Dakota Aggregate General Election Expenditure	Legal Services	8/28/78	60.0
Full Name, Mailing Address and	ZIP Code	for this Candidate \$ Name of Federal Candidate Supported,	Particulars of Expenditure	Date (month,	Amount
of Each Payee	LIT CODE	State, District & Office Sought	raincolars of Capendidie	day, year)	
Jenkins, Nystrom & Sterlacci, P. C. 2033 M Street, N. W Washington, D. C.		Ed Brooke United States Senate Massachusetts Aggregate General Election Expenditure for this Candidate - S	Legal Services	8/30/78	120.0
Full Name, Mailing Address and	ZIP Code	Name of Federal Condictate Supported,	Particulars of Expenditure	Date (month,	Amount
of Each Payee		State, District & Office Sought Aggregate General Electron Expenditure		day, year)	
		for this Candidate \$			
CHINTOTAL AL	name toptio	and a second state of the			\$
SUBTOTAL of expenditures this					

	0	
-	1978 Committion	
_		
	Election Commission	
	[MCDON COMMINS	
	Street, N.W. ton, D.C. 20463	

### **DEBTS AND OBLIGATIONS**

Supporting Line Numbers 12 and 13 of FEC FORM 3

(Indicate Primary or General Election for each Entry)

Pope \_1 of \_1 for

Line Number \_13

(Use Separate Schedules for each numbered line)

Full Name, Mailing Address and ZIP Code of Debtor or Creditor National Republican Congressional Committee 512 House Office Building Annex	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
Washington, D. C. 20515	1977	- 75 000 00	- 20,000,00	. / 5 000
Primary      General      Other     NATURE OF OBLIGATION (Details of Debt):	1	\$ 75,000.00	\$ 30,000.00	\$ 45,000.0
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
Primary     General     Other	127	s	5	
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
Full Name, Mailing Address and ZIP Code of Debtor or Creditor		Debt, Contract, Agreement or	Payment	Balance at Close of
		Debt, Contract, Agreement or Promise	Payment To Date	Balance at Close of This Period

Carry outstanding balance only to appropriate line of summary

## Chairman, Oregon

MEMBERS Inc. Howard H. Baher, Jr., Tennren, John H. Chalere, R. L. Sarry Goldwater, Aris. Sarry Goldwater, Aris. San Grin G. Match, Usah San, B. I. Noyahawa, Calif. San, B. John Heins III, Pran. Santon McC. Machin, Jr., Md Santon McC. Machin, Jr., Md Santon B. Bahmitt, N. M. Sathard S. Schweiker, Pran. Sathart S. Stafford, Vermons ven. Risbert T. Stafford, Vermons ven. Milons R. Young, N. Dub.

Inducy A. Smith

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# National Republican Senatorial Committee

'79 MAR 15 PH 12:17

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

Note: Committees authorized by a candidate to receive contributions and make expenditures	al Matching Funds)	LIGAT FLECTION COMMISSION
separate records with respect to each election.	in connection with more	than one election must maintain
Name of Candidate or Committee (in full) Expenditures 227 Massachusetts Ave., N. E. 3	Dillo. NoCO002746	Candidate/Committee
Washington, D. C. 20002		
City, State and ZIP Code Check if address is different than pr	reviously reported	Year of Election
Type of Report Icheck appropriate boxes)     Tenth day report preceding     April 10 Quarterly Report	convention)	<ul> <li>Termination Report</li> <li>Amendment for</li> </ul>
October 10 Guarterly Report     Thirtieth day report following	election	(which report)
January 31 Annual Report (primary, general	or convention)	
January 31 Annual Report     Iprimary, general     KMonthly Report September on in the State of (month) (date)	mary and General (PENDITURES	Other (special, runoff, etc.)
January 31 Annual Report     (primary, general     (primary, general     (date)     (date)     This is a report for     Primary Election     SUMMARY OF RECEIPTS AND EXI	mary and General (PENDITURES	Column B Calendar Year-To-Da
January 31 Annual Report     (primary, general     (primary, general     (date)     (date)     This is a report for     Primary Election     General Election     SUMMARY OF RECEIPTS AND EXI     (Figures may be rounded to nearest	mary and General ( PENDITURES in dollar.) Column A	Column B
January 31 Annual Report     (primary, general     (primary, general     (date)     (date)     This is a report for     Primary Election     General Election     SUMMARY OF RECEIPTS AND EXI     (Figures may be rounded to nearest     5 Covering Period Sept. 1     Through Sept. 30, 1978	PENDITURES In dollar.) Column A This Period	Column B Calendar Year-To-Da
January 31 Annual Report     (primary, general     (primary, general     (date)     (date)     (date)     This is a report for     Primary Election     General Election     SUMMARY OF RECEIPTS AND EXI     (Figures may be rounded to nearest     5 Covering Period Sept. 1     Through Sept. 30, 1978     6 Cesh on hand January 1, 19	mary and General ( PENDITURES in dollar.) Column A This Period S	Column B Calendar Year-To-Di S
January 31 Annual Report     Iprimary, general     XXMonthly Report September     Imonth)     on	mary and General ( PENDITURES in dollar.) Column A This Period S	Column B Calendar Year-To-Da S S
January 31 Annual Report     (primary, general     (month)	mary and General ( PENDITURES in dollar.) Column A This Period S	Column B Calendar Year-To-Da S S
January 31 Annual Report     (primary, general     (month) on	mary and General ( PENDITURES in dollar.) Column A This Period S	Column B Calendar Year-To-Da S S S
January 31 Annual Report     Iprimary, general     XXMonthly Report September on in the State of      This is a report for Primary Election General Election     SUMMARY OF RECEIPTS AND EXIL     (Figures may be rounded to nearest     S Covering Period Sept. 1	mary and General ( PENDITURES in dollar.) Column A This Period S	Column B Calendar Year-To-Da S S S
January 31 Annual Report     (primary, general     (date)     (date)     (date)     (date)     This is a report for     Primary Election     General Election     SUMMARY OF RECEIPTS AND EXI     (Figures may be rounded to nearest     S Covering Period Sept. 1     Through Sept. 30, 1978     Gesh on hand January 1, 19     Cesh on hand at beginning of reporting period     B Total receipts (from line 19)     la) Subtotal IAdd lines 7 and 8 for Column A and lines 6 and 8 for Column B)     Total expenditures (from line 25).     Total expenditures (from line 25).     Yalve of contributed items on hand to be liquidated	mary and General ( PENDITURES in dollar.) Column A This Period S	Column B Calendar Year-To-Da S S S

Note: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. Section 4379, 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 8-187620 (R0506) Expires 3-31-81

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

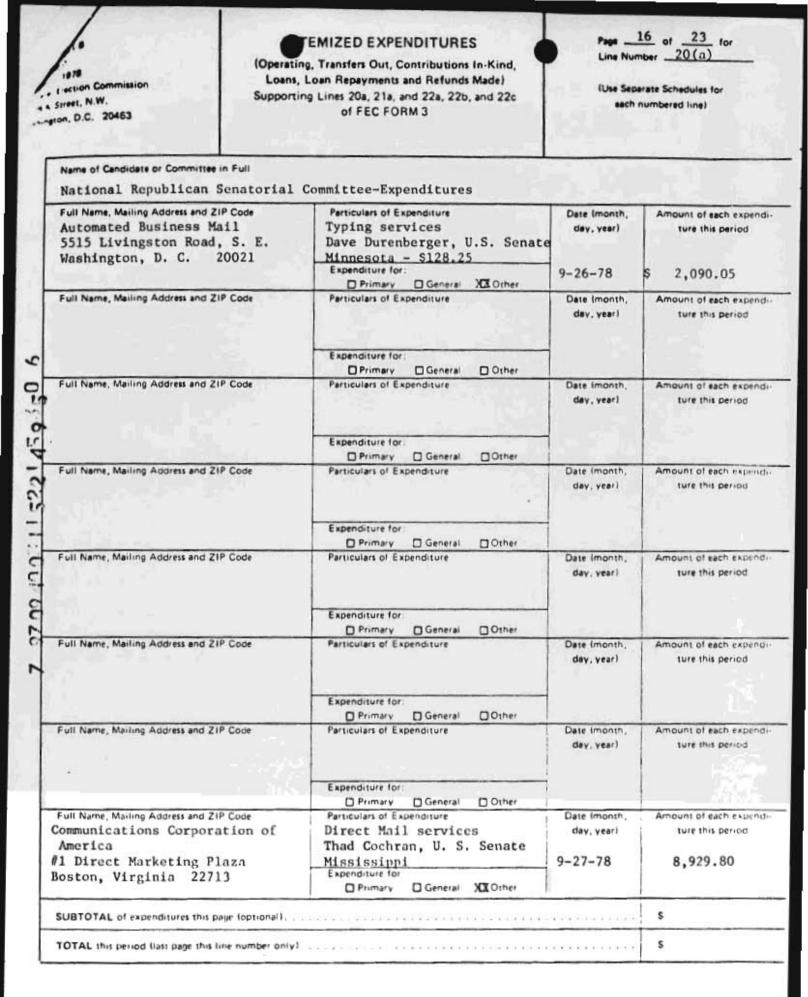
Any information reported herein may not be copied for sale or use by any person for purposes of soliciting contributions or for any commercial purpose.

DETAILED SUMMARY OF RECEIPTS (Page 2, FEC FORM		Second State
ANI OF CANDIDATE OR COMMITTEE National	REPORT COVERING THE PE FROM: Sept. 1	RIOD 1.c TOSept. 30, 1978
RECEIPTS	Column A This Period	Column 8 Calendar Year-To-Date
14 Contributions from Individuals (including contributions in-kind):		A LANDARY
(a) tremized (use Schedule A)		
(b) Unitemized		and the second
(c) Sales and collections included above:		and the second of the second
List by event on memo Schedule D (S )		
(d) Subtotal of contributions from individuals		5
(a) Funds from affiliated/authorized committee (Itemize on Schedule A		the second states and
regardless of amount).		
(b) Funds from other committees (Itemize on Schedule A regardless of amount)		
(c) Contributions in-kind from political committees		a de la companya de l
(Itemize on Schedule A regardless of amount)		A CONTRACTOR OF A CONTRACTOR
(d) Subtotal of transfers in and contributions in-kind from political committees	. 5	s
16. Other Income		
(a) Itemized (use Schedule A)	the second s	
(b) Unitemized		
(c) Subtotal of other income		S
<ol> <li>Loans and Loan Repayments Received:</li> <li>(a) Itemized (use Schedule A).</li> </ol>	5	
<ul> <li>(b) Uniternized</li> <li>(c) Subtotal of loans and loan repayments received.</li> </ul>		s
18. Refunds, Rebates, Returns of Deposits:		
(a) Itemized (use Schedule A)		
r [b] Unitemized	and the second se	
Tr ici Subtotal of refunds, rebates, returns of deposits		s
M. Total Receipts	5	s
EXPENDITURES		•
20. Operating Expenditures		
(a) Itemized luse Schedule B)		
Ó (b) Unitemized		
<ul> <li>(c) Subtotal of operating expenditures.</li> <li>21 Loans, Loan Repayments, and Contribution Refunds Made:</li> </ul>		S
(a) Itemized (use Schedule B)	s	all a state of the state of the
(c) Subtotal of loans and loan repayments made and contribution refunds		s
22: Transfers Out to Political Committees:		
(a) To affiliated/authorized committee (Itemize on Schedule B regardless	1	and the second
of amount)	. \$	
(b) To other committees (Itemize on Schedule B regardless of amount)	. \$	
(c) Contributions in-kind to other committees	100.07	h mana na sa
(Itemize on Schedule B regardless of amount)		The second second second second
(d) Subtotal of transfers out		S
23. Independent Expenditures (use Schedule E). 24. Coordinated Expenditures Made by Political Committees (2 U.S.C. 441a(d))	5	5
(Itemize on Schedule F) MEMO TOTAL \$25,586.05	. 5	s state
25. Total Expenditures	5	s
RECEIPTS AND EXPENDITURES. NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES		
26. Total Receipts (from line 19)	. \$	
27. Transfers in (from line 15(a))	. s	
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)	.   \$	

ertion Commission crition br>crition criti	Supporting Line N of FEC	lumbers 12 an FORM 3	nd 13	Page <u>1</u> of Line Number (Use Separate each numb	Schedules for
Name of Candidate and Commit National Republica	n Senatorial Committee-	-Expenditur	es		
Full Name, Mailing Address and National Republican Committee 512 House Office Bu Washington, D. C.	ZIP Code of Debtor or Creditor Congressional	Date (month, day, year) 1977	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
D Primary 1	General Other		s 75,000.00	s 50,000.00	s 25,000.0
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
		1000	s	s	s
Primary Primar	(J General L3 Other letails of Debt):	1	-		
NATURE OF OBLIGATION ID	ietails of Debt):	Date (month,	Amount of Original	Cumulative	Outstanding
NATURE OF OBLIGATION ID	ietails of Debt):	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
NATURE OF OBLIGATION (D	ZIP Code of Debtor or Creditor	COLUMN 101 (101) (101) (101)	Amount of Original Debt, Contract, Agreement or	Cumulative Payment	Outstanding Balance at Close of
NATURE OF OBLIGATION (D Full Name, Mailing Address and Primary 1 NATURE OF OBLIGATION (D	ZIP Code of Debtor or Creditor	day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period

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1978 Loans,		SEPTEMBER MIZED EXPENDITURES ng, Transfers Out, Contributions In-Kind, Loan Repayents and Refunds Made) ng Lines 20a, 21a, and 22a, 22b, and 22c of FEC FORM 3	Page <u>1</u> of <u>1</u> for Line Number <u>22(c)</u> (Use Separate Schedules for sach numbered line)	
Name of Candidate or Committee		Reference and the second se		
Full Name, Mailing Address and Zt	and the second se	Committee-Expenditures Particulars of Expenditure	Duritoria	1
Rodney A. Smith 4836 South 28th Stree Arlington, Virginia		In-kind contribution-Durenberg for Senate - Minnesota Consulting expenses Expenditure for:	Date (month, CT day, year)	Amount of each expende ture this period
and the second		Primary DXGeneral DOther	Aug. '78	\$ 576.67
Full Name, Mailing Address and ZI United Airlines Dept. 745711 P. O. Box 36022M Pittsburgh, Pennsylvan		Particulars of Expenditure In-kind contribution - Helms for Senate-North Carolina Air Fare Expenditure for:	Date (month, day, year)	Amount of each expendit ture this period
OFull Name, Mailing Address and Zli		Primary General Other Particulars of Expenditure	Aug. '78 Date (month.	84.00
7		Expenditure for:	day, year)	Amount of each expend- ture this period
Full Name, Mailing Address and ZII	P Code	Particulars of Expenditure	Date (month, day, year)	Amount of each extended ture this period
		Expenditure for:		
Full Name, Mailing Address and ZI	P Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expende- ture this period
		Expenditure for		
		Primary General Other		
Full Name, Mailing Address and ZIF	Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expendi- ture this period
		Expenditure for		
Full Name, Mailing Address and ZIF	Code	Primary General Other Particulars of Expenditure	Date imonth, day, year)	Amount of each expendi- ture this period
		Expenditure for		
Full Name, Mailing Address and ZIF	2 Code	Particulars of Expenditure	Date Imonth, day, yearl	Amount of each expendi- ture this period
		Expenditure for Primary General Other		
SUBTOTAL of expenditures this pe	ge (optional).			s

Commission Commission D.C. 20463 POLITICAL ON BEI		ZECOORDINATED EXPENDI PARTY COMMITTEES OR DE HALF OF CANDIDATES FOR F (2 U.S.C. 441a(d)) (Supporting Line 24, FEC F be used only by Political Committees in the	Page <u>1</u> of <u>3</u> For Line 24, FEC Form 3		
Name of Political Committee					
	A CONTRACT OF A	orial Committee-Expenditure	the second second descent second descent second		
		ike coordinated expenditures by a political p		res	O NO
Full Name, Mailing Address a of Each Payee	and ZIP Code	Republican National and/or 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	sylvania 15250	Nancy Kassebaum United States Senate Kansas	Air Travel	Aug. '78	\$ 305.00
		Aggregate General Election Expenditure for this Candidate - S	2011.110		
Full Name, Mailing Address a of Each Payee		Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
The Postmaster U. S. Postal Syste		Don Shasteen United States Senate Nebraska	Postage	Sept.'78	3,000.00
		Aggregate General Election Expenditure for this Candidate - S			
Full Name, Mailing Address a of Each Payee		Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
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 S			
Full Name, Mailing Address a		Name of Federal Candidate Supported,	Particulars of Expenditure	Date (month,	Amount
of Each Payee National Direct Ma Services, Inc. 2233 Wisconsin Ave Suite #400	Mail Ve., N. W.	State, District & Office Sought David Durenberger United States Senate Minnesota	Postage	dav.year) Sept.'78	7,140.00
Washington, D. C.	20007	Aggregate General Election Expenditure	50-11-7		
Full Name, Mailing Address a of Each Payee		for this Candidate \$ Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
The Postmaster United States Sena Washington, D. C.	1017072000000	Thad Cochran United States Senate Mississippi	212 G Postage	Sept.'78	127.50
		Aggregate General Election Expenditure for this Candidate - S			
		onal}		SUBTOTAL	\$10,647.

ITEMIZED COORDINATED EXPENDITURES MADE BY POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S) ON BEHEEF OF CANDIDATES FOR FEDERAL FFICE (2 U.S.C. 441a(d)) (Supporting Line 24, FEC Form 3)

Page \_\_\_\_\_ of \_\_\_\_\_

For Line 24, FEC Form 3

(To be used only by Political Committees in the General Election)

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- ... - OC. 20463

If YES, name the designating committee: R		Respective State Con		ONG
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	Sept.'78	\$ 128.
	Aggregate General Election Expenditure for this Candidate - S			
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 United States Senate Maine	Housing	9-1-78	1,500.
	Aggregate General Election Expenditure for this Candidate - S			
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
Ronald Roberts 3205 Blome Road Cincinnati, Ohio 45243	Bob Griffin United Statcs Senate Michigan	Political consult- ing & expenses	Sept.'78	798.
	Aggregate General Election Expenditure for this Candidate - S	1.10		
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
Ronald Roberts 3205 Blome Road Cincinnati, Ohio 45243	Charles Percy United States Senate Illinois	Political consult- ing & expenses	Sept.'78	519.5
	Aggregate General Election Expenditure for this Candidate - S	-224 196		
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
Ronald Roberts 8205 Blome Road Cincinnati, Ohio 45243	John Tower United States Senate Texas	Political Consult- ing & expenses 7 1/2 5	Sept.'78	1,363.5
	Aggregate General Election Expenditure for this Candidate - S	2011 25157		

#### ITEMIZED COORDINATED EXPENDITURES MADE BY POLITICAL PARTY COMMITTEES OR DESIGNATE AGENT(S) ON BEALF 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

. c 20463

Has your Committee been designated to mak If YES, name the designating committee: Re			YES O	100
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	Sept.'78 \$	\$ 8,929.80
	Aggregate General Election Expenditure for this Candidate S	11 - 7 L		
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	Nancy Kassebaum United States Senate Kansas	Finance Consulting and expenses	Aug.'78	562.12
	Aggregate General Election Expenditure for this Candidate - S	26-2244		
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	John Warner United States Senate Virginia	Finance Consult- ing & expenses	Sept.'78	568.00
	Aggregate General Election Expenditure for this Candidate - S	1. 19 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1.		
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	Rudy Boschwitz United States Senate Minnesota	Finance Consult- ing & expenses 2/4 < -3	Aug.'78	568.67
	Aggregate General Election Expenditure for this Candidate S	S. 197 77313		2015
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 - S			
BURNATAL ALCONTRACTOR ON AND AND A	nal)	MEMO, SUW	TOTAL	\$ 10,628.5

C



nator Bob Packwood Chairman, Oregon

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National Republican Senatorial Con RECEIVED ITTEE

'79 MAR 15 PM 12: 16

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 10 Day Pre General Report.

If you have any further questions regarding this matter, please feel free to contact me.

Sincerely, odnig Semith

Rodney A. Smith Treasurer

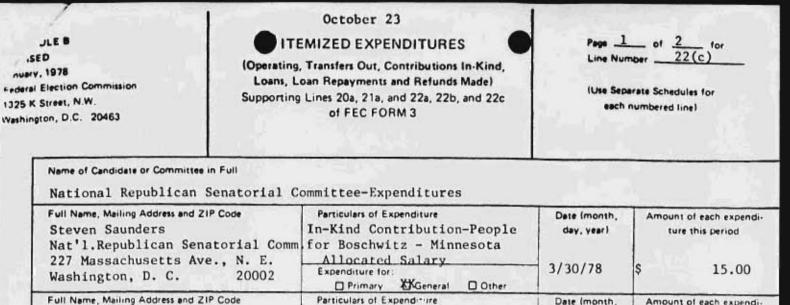
RAS:lec Enclosures

227 Massachusetts Avenue, N.F. • Washington, D.C. 20002 • (202) 224-2351

"A copy of our report is block with the Endered Electron Commission and is available for particular from the Endered Electron Commission, Washington, D.C."

### DETAILED SUMMARY OF RECEIPTS AND EXPENDITURES (Page 2, FEC FORM 3)

		REPORT COVERING THE PE	RIOD TO:
Reput	RECEIPTS	Column A	Column B
		This Period	Calendar Year-To-Date
	ntributions from Individuals (including contributions in-kind):		Services - Party and
	Itemized (use Schedule A)		ALTER AUTO ALTER THE
	Unitemized		
(c)	Sales and collections included above:	a sector a	and the second second
1.000	List by event on memo Schedule D (\$ )		
A 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	Subtotal of contributions from individuals		5
	Funds from affiliated/authorized committee (Itemize on Schedule A		
107	regardless of amount).	\$	
(6)	Funds from other committees (itemize on Schedule A regardless of amount).	5	
(c)	Contributions in-kind from political committees		
100	(Itemize on Schedule A regardless of amount)		
	Subtotal of transfers in and contributions in-kind from political committees her Income:	S	5
	Itemized (use Schedule A)	\$	and the second se
	Unitemized		State of the state
V (c)	Subtotal of other income	S	S
	ans and Loan Repayments Received:		
	Itemized (use Schedule A)		
	Unitemized		
	Subtotal of loans and loan repayments received.	5	S
	Itemized (use Schedule A)	\$	COLUMN TO STREET
The second second	Unitemized		
	Subtotal of refunds, rebates, returns of deposits		S
~			
NO. To	tal Receipts	5	S
-	EXPENDITURES	The last	
20. 00	erating Expenditures:		Last a state of the REP
~ (a)	Itemized (use Schedule B)	\$	etter and the second second
- (b)	Unitemized	S	
	Subtotal of operating expenditures	S	S
21. Lo	ans, Loan Repayments, and Contribution Refunds Made: Itemized (use Schedule B)		Sector and the sector of the
Cibi	Unitemized	<b>S A A A A A A A A A A</b>	
	Subtotal of loans and loan repayments made and contribution refunds	s	s
	insfers Out to Political Committees:		and the second se
- (0)	To affiliated/authorized committee (Itemize on Schedule B regardless		
-	of amount)	\$	All the second second second second
0.750	To other committees (Itemize on Schedule B regardless of amount)	\$	
(c)	Contributions in-kind to other committees (Itemize on Schedule 8 regardless of amount)	s 2,797.99	
(4)	Subtotal of transfers out		s
	lependent Expenditures (use Schedule E).		s
	ordinated Expenditures Made by Political Committees (2 U.S.C. 441a(d))		
(ite	mize on Schedule F) Memo. Total. \$282.00	S	s
25 To	tal Expenditures	5 0.254	1
	RECEIPTS AND EXPENDITURES. NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES	1. S	
26. To	al Receipts (from line 19)	s	
	nsfers in (from line 15(a))		
27. Tra			
	Receipts (Subtract line 27 from line 26)		the second
28. Ne	Receipts (Subtract line 27 from line 26)		
28. Ne 29. To	al Expenditures (from line 25)	5	
28. Ne 29. To		5	



Particulars of Expenditure

Date (month,

Amount of each expendi-

14

Rodney A. Smith 4836 South 28th Street Arlington, Virginia 22206	In-Kind Contribution- Victory '78 - Maine Finance consulting & expenses Expenditure for: Primary XXGeneral Other	day, year) 8/3/78	ture this period
Full Name, Mailing Address and ZIP Code Rodney A. Smith 4836 South 28th Street	Particulars of Expenditure In-Kind Contribution-Friends of Roger Jepsen - Iowa	Date (month, day, year)	Amount of each expendi- ture this period
Arlington, Virginia 22206	Expenditure for:	8/3/78	531.47
Full Name, Mailing Address and ZIP Code Rodney A. Smith 4836 South 28th Street	Particulars of Expenditure In-Kind Contribution-People for Boschwitz - Minnesota	Date (month, day, year)	Amount of each expendi- ture this period
Arlington, Virginia 22206	Finance consulting & expenses Expenditure for: Primary & General Other	8/3/78	539.92
Full Name, Mailing Address and ZIP Code Rodney A. Smith 4836 South 28th Street	Particulars of Expenditure In-Kind Contribution-Cochran for Senate - Mississippi	Date Imonth, day, year)	Amount of each expendi- ture this period
Arlington, Virginia 22206	Finance consulting & expenses Expenditure for: Primary XXGeneral Other	8/3/78	286.05
Full Name, Mailing Address and ZIP Code Rodney A. Smith 4836 South 28th Street	Particulars of Expenditure In-Kind Contribution-Cochran for Senate - Mississippi	Date (month, day, year)	Amount of each expendi- ture this period
Arlington, Virginia 22206	Finance Consulting & expenses Expenditure for: Primary XKGeneral Other	9/13/78	872.80
Full Name, Mailing Address and ZIP Code Mary Hasenfus Nat'1.Republican Senatorial Comm.	Particulars of Expenditure In-Kind Contribution-Brooke Committee-Massachusetts - Re-	Date (month, day, year)	Amount of each expendi- ture this period
227 Massachusetts Ave., N. E. Washington, D. C. 20002	Imbursed Travel&lodging expense Expenditure for Primary &General DOther	es 9/28/78	212.50
Full Name, Mailing Address and ZIP Code John Mooring Nat'1.Republican Senatorial Comm.	Particulars of Expenditure In-Kind Contribution to Richardson for Congress-Utah	Date (month, day, year)	Amount of each expendi- ture this period
227 Massachusetts Ave., N. E. Washington, D. C. 20002	Videotaping Expenditure for Primary XKGeneral DOther	Sept.'78	25.00
SUBTOTAL of expenditures this page (optional).	MEMO	SUBTOTAL	\$ 2,749.99
TOTAL this period flast page this line number only).			s

.SED (Operating, wary, 1978 Loans, Li weat Election Commission Loans, Li		October 23 MIZED EXPENDITURES Transfers Out, Contributions In-Kind, oan Repayents and Refunds Made) Lines 20a, 21a, and 22a, 22b, and 22c of FEC FORM 3		Line Nun	Page 2 of 2 for Line Number 22(c) (Use Separate Schedules for each numbered line)	
	of Candidate or Committee in I Lonal Republican Ser		mmittee-Expendit	ures		
John Nat' 227	Name, Mailing Address and ZIP ( n Mooring '1.Republican Senato Massachusetts Ave., nington, D. C. 200	orial Comm.	Videotaping Expenditure for	ution-Simps oming	son Date (month, day, year) Sept. '78	Amount of each expend ture this period \$ 25.00
Full Name, Mailing Address and ZIP Code Communications Televideo Ltd. 918 Sligo Avenue Silver Spring, Maryland 20910		Primary CGe Particulars of Expenditu In-Kind Contribu for Senate - Wy Videotape Case	re ution-Simps oming	Date (month, son day, year)	Amount of each expend ture this period	
		_	Expenditure for: Primary XXGer		Sept. '78	23.00
Full Name, Mailing Address and ZIP Code		Particulars of Expenditu Expenditure for:	•	Date (month, day, year)	Amount of each expend ture this period	
·			Primary Ger			
Full N	vame, Mailing Address and ZIP C	;ode	Particulars of Expenditu Expenditure for:		Date (month, day, year)	Amount of each expend ture this period
Full Name, Mailing Address and ZIP Code		Primary Ger Particulars of Expenditu		Date (month, day, year)	Amount of each expend ture this period	
			Expenditure for	neral Other		
Full Name, Mailing Address and ZIP Code		Particulars of Expenditu	• •	Date (month, day, year)	Amount of each expend ture this period	
		F	Expenditure for:	neral Other		
Full Name, Mailing Address and ZIP Code		loge	Particulars of Expenditur	and the second se	Date (month, day, year)	Amount of each expend ture this period
		F	Expenditure for.	neral Other		
Full Name, Mailing Address and ZIP Code		Particulars of Expenditui	e	Date (month, day, year)	Amount of each expend ture this period	
		Expenditure for Primary Gen	neral DOther		-33	
SUBT	OTAL of expenditures this page	(optional)		ME	MO SUBTOTAL	\$ 48.00
-	L this period flast page this line	number only)			MO TOTAL	\$ 2,797.99

HITS Clean Commission K Street, N.W. Hington, D.C. 20463

#### shown on Line 20(a) as expenditures ITEMIZED COORDINATED EXPENDITURES MODE BY POLITICAL RTY 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 \_\_\_\_\_ of \_\_\_\_

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

Full Name, Mailing Address and ZIP Code	Name of Federal Candidate Supported,	Particulars of Expenditure	Date (month, )	Amount
of Each Payee	State, District & Office Sought	a contract 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 \$	282.0
	Aggregate General Election Expenditure for this Candidate S	1		
Full Name, Mailing Address and ZIP Code of Each Pavee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
See Section 1	Aggregate General Election Expenditure for this Candidate S			
uli Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date imonth, day, year)	Amount
	Aggregate General Election Expenditure			
ull Name, Mailing Address and ZIP Code of Each Payee	for this Candidate S Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
	Aggregate General Election Expenditure			
uli Name, Mailing Address and ZIP Code of Each Payee	for this Candidate S Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amount
	Aggregate General Election Expenditure			
JBTOTAL of expenditures this page loptio	the second se			s
OTAL this period flast page this line number				

TETTETTE

National Republican Senatorial Committee

### '79 MAR 15 PM 12:16

March 12, 1979

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,

y A. Amil

Rodney A. Smith Treasurer

RAS:lec

Enclosures

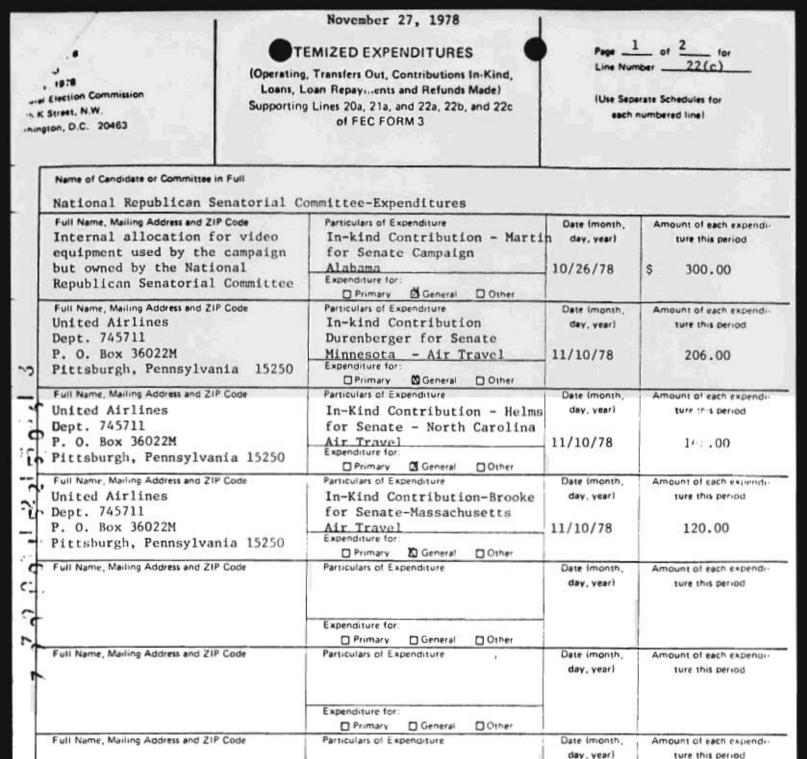
2

Chairman, Oregon

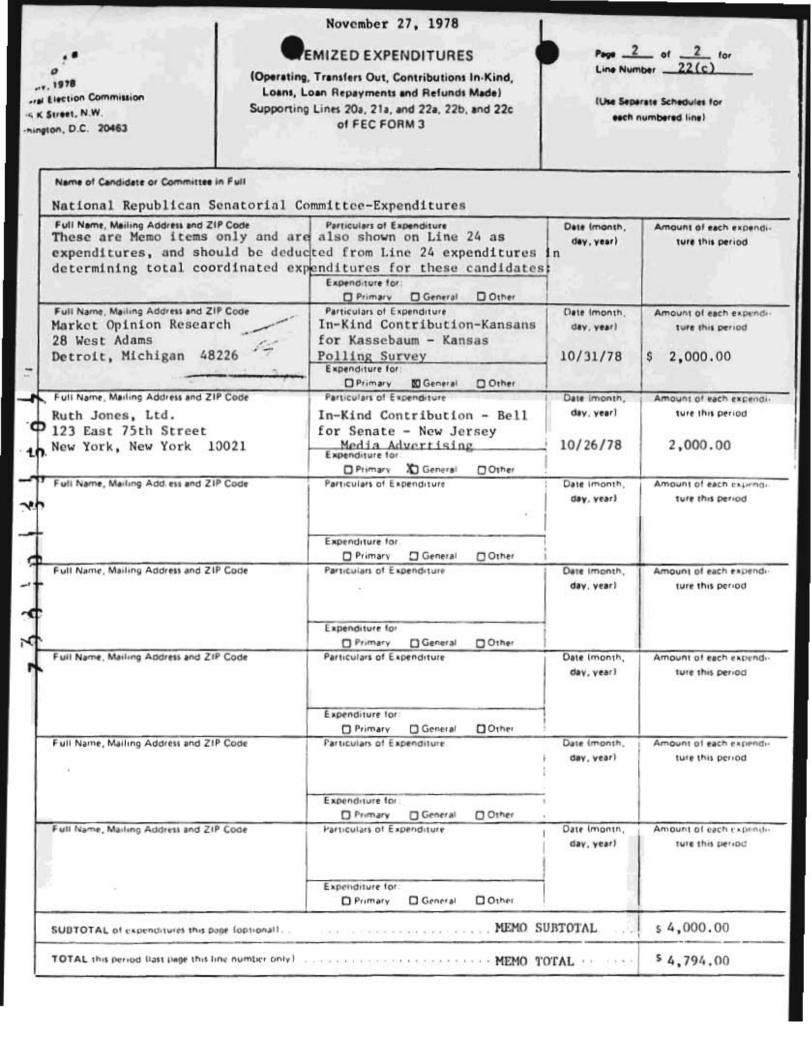
t H. Baker, Jr., 1 L. Chaler, R. L.

227 Massachusetts Avenue, N.F. • Washington, D.C. 20002 • (202) 224-2351

"A copy of our report is falsel with the Explorat Election Commission and is available for porchase from the Explorat Election Commission, Weshington, D.C."



Expenditure for: Primary General Other Full Name, Mailing Address and ZIP Code Particulars of Expenditure Date imonth. Amount of each expende day, year) ture this period Expenditure for: D Primary General Other SUBTOTAL of expenditures this page (optional) MEMO SUBTOTAL 794.00 s TOTAL this period flast page this line number only) s



of the second of the 「日日の日日日日」 INDINATES ----SHIL WA MAR P.M. 1979 Federal Election Commission 14 20463 1325 K Street, Northwest 50% Washington, D. C. Mr. David Greevy 500 7.2.2. On web did game CLUB THE DESCRIPTION NOTION Call of the state WITH DESCRIPTION OF The City and the second 1000 anal - Kepublican -Benatorial Committee Sin vivit ce 227 MASSACHUSETTS AVENUE N.E. W WASHINGTON, DC 2002C W 9 15 Nd SI JVH 6L. State of the state LENT RAL LIECTION きろうたね 4



### FEDERAL ELECTION COMMISSION

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

2	74
MEMORANDUM TO:	CHARLES STEELE
FROM:	MARJORIE W. EMMONS
DATE :	MARCH 22, 1979
SUBJECT:	OBJECTION - MUR 820 - General Counsel's Report dated 3-16-79; Received in OCS 3-19-79, 11:33

0	The above-named document was circulated on a 48
10	hour vote basis at 12:00, March 20, 1979.
~	Commissioner Friedersdorf submitted an objection
<u>'</u> ^	at 4:15, March 21, 1979, thereby placing MUR 820 on the
	Execuitve Session Agenda for March 29, 1979.
C	
	Commissioner Thomson has submitted an objection
C	at 8:50, this date, requesting discussion of the matter.
5	
2	

March 19, 1979

MEMORANDUM TO:	Marge Emmons
FROM:	Elissa T. Garı
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.

# BEFORE THE FEDERAL ELECTION COMMISSION MAR 19 All: 33

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

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#### 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:

 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.

- 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 ( $S_1$ ) and \$122,985.30 to the Martin Campaign for the Allen Senate Seat ( $S_2$ ). 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  $S_1$ , as authorized by the Republican National

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Committee and the Alabama Republican Executive Committee, and \$123,000 in connection with S2, 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

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[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. § 44la(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.

Thus, it would appear that the Martin principal campaign committee for  $S_1$  could properly rely on AO 78-19 in its transfer of funds to the Martin principal campaign committee for  $S_2$ , 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  $S_1$  and  $S_2$  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 <u>candidate</u> 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.

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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. § 44la(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.

#### 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.

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2. Approve and send the attached conciliation agreement and letter.

William C. Oleake General Counsel

#### Attachments

- 1. NRSC Response
- 2. Conciliation Agreement
- 3. Letter to Respondent



LAW OFFICES

JENKINS, NYSTROM & STERLACCI, P.C.

12021 293-2505

January 10, 1979

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

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

2033 M STREET. N.W. WASHINGTON, D. C. 20036 OF COUNSEL

LU1: 11

90111

MICHIGAN OFFICES

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.



National

Committee

Certocd)

September 5, 1978

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

Dear Bob:

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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,

BROCK

BB/bnp

cc:	Bob Moore
	Ben Cotten
	Charlie Black
001409	Jacquie Nystrom
	Matt Wirgau
42	T

Jay Banning

# Republican National Committee

BIII Brock Chairman

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

Sec. 1

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
· 4.	Jacquie Nystrom
	Jay Banning



## Republican National Committee

Bill Brock Chairman

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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 Jational Committee

Bill Brock Chairman

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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
87	Ben Cotten
	Charlie Black
* 2	Jacquie Nystrom
	Jay Banning
1	Kenny Klinge

Dwight D. Eisenhower Republican Center: 310 First Street Southeast. Washington, D.C. 20003. (202) 484-6500.

# ational Committee

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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:

- 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.
- Such amount of allowed expenditures under said provision has been computed tentatively by the Federal Election Commission as the amount of \$62,507.00.
- 10 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).
- 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 Jul 22, 1578 1978 at Washington D. C.

1978

National Republican Senatorial Committee

Bv Title

Alabama Republican Executive Committee By William D. Harris

Chairman Title

Birmingham, Alabama.



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

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

1.

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

- 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.
- Such amount of allowed expenditures under said provision has been computed tentatively by the Federal Election Commission as the amount of \$62,507.00.
  - That State wishes to designate Senatorial its agent for the purpose of making such expenditures up to the amount of \$62,000.00
  - 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.
    - Senatorial agrees to make such expenditures in behalf of candidate, or if itsisany 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

Title

Alabama Republican Executive/Committee

Title Chairman

Dated\_\_\_\_\_1978 at Birmingham, Alabama Politel Financial Service

901 L'Enfant Plaza Center, S.W. Washington, D.C. 20024

(202) 554-2206

Stan Huckaby Res: (202) 554-4679

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Pederal Campaign Dinancial 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 Sentate, 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 Techosy

Stan Huckaby

SH: tmb

#### 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

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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.



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. 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.

### х

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

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Further deponent saith not.

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· · 1.11.

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 <u>II</u> day of January 1979.

ance Dorretes

Notary Public My commission expires 3-3/- &3

	(	a dat	TE: Tim MARTIN
			2 3 4 5 6
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## BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of National Republican Senatorial Committee

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MUR 820 (78)

### CONCILIATION AGREEMENT

This matter was initiated on the basis of a written complaint filed with the Federal Election Commission (FEC or Commission). An investigation was conducted and the Commission has found reasonable cause to believe that the respondent, the National Republican Senatorial Committee (NRSC), violated 2 U.S.C. § 441a(d).

Now, therefore, the respective parties herein, the Federal Election Commission and respondent National Republican Senatorial Committee, having duly entered into conciliation pursuant to 2 U.S.C. § 437g(a)(5), do hereby agree as follows:

- I. That the Federal Election Commission has jurisdiction over respondents National Republican Senatorial Committee and the subject matter of this proceeding;
- II. That respondent National Republican Senatorial Committee has had a reasonable opportunity to demonstrate that no action should be taken in this matter;
- III. That the pertinent facts in this matter are as follows:

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

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- 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.

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.

> William C. Oldaker General Counsel Federal Election Commission

Date

Date

Rodney A. Smith Treasurer





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# FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL RETURN RECEIPT REQUESTED

James F. Schoener, Attorney Jenkins, Nystrom & Sterlacci, 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	то
FROM:	
DATE:	
SUBJECT :	

MARJORIE W. EMMONS M

MARCH 1, 1979

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.

# 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.

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# BEFORE THE FEDERAL ELECTION COMMISSION

# 79 FEB 27 P4: 34

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National Republican Senatorial Committee

In the Matter of

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

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	REPORTS ANALYSIS REFERRAL UPDATE	
	DATE <u>March 1,1979</u> TO: Office of General Counsel ATTENTION: Kathy Perkins THROUGH: STAFF DIRECTOR A. FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS A. ANALYST <u>David Greevy</u> TEAM CHIEF <u>Peggy Sims</u> <u>Propy fewer</u> COMPLIANCE REVIEW <u>Brown</u> ANALYST <u>David Greevy</u> TEAM CHIEF <u>Peggy Sims</u> <u>Propy fewer</u> COMPLIANCE REVIEW <u>Brown</u>	
	MUR No. <u>820</u> DATE OF ORIGINAL REFERRAL <u>12-13-78</u> National Republican Senatorial Committee-Expenditures <u>Attachme</u> **PURPOSE: INFORMATION	nts
-	RFAI, dated 1/29/79 to October 20 Monthly & 10 Day Pre-General Election Reports	1
ষ	Response, dated 2/13/79, to above RFAI	2
25	Telecon of 2/28/79 regarding response of 2/13/79	3
5 - 0	Note: Because of the complexity of the information requested and <b>provide</b> d, each appropriate paragraph in the RFAI has been lettered. Attachments, correspond to these letters, have been provided for the several portions of the respon- and corresponding letters have been placed appropriately within the body of the telecon.	

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OUTCOME: (if applicable)

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Committee will reanalyze all entries reported on Line 22(c), and will provide amendments as necessary.

\*Commission unit which initiated original Referral (e.g. AUDIT/RAD/OGC). \*\*INFORMATION. or RESULTS OF RAD ACTION. as appropriate.



# FEDERAL EFECTION COMMISSION

H25 K STREET NW WASHINGTON DT 20363

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 Nonthly & 10 Day Pre-General During review of the <u>Election</u> Reports of Receipts and Expenditures, we noted that you omitted certain information or rade apparent mathematical errors in certain antries. 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 latter. If you have any questions, please do not hesitate to contact <u>David Creevy</u> in our Reports Analysis Division on the coll free number (c00)424-9530. Our local number is (202)523-1474.

Sinceraly, Stores, B. Pour

Orlando B. Potter Staff Director

Attachment FEC Form 12



C

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/		LD. NO.: C000	
REQUEST FOR ADDITIONAL INF AND EXPENDITURES COVERING PURSUANT TO THE FEDERAL EL	ORMATION FOR THE Cotober THE PERIOD 9/1/78 LECTION CAMPAIGN ACT OF 1	20 Nonthly TIJROUGH 971, AS AMENDED.	REPORT OF RECEIPTS
A review of the report indicates th return a copy of this form with your	at additional information is nee amended submission(s).	ded in order to be co	onsidered complete. Please
Please provide the required data, as in	ndicated (x):		
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\_\_\_\_ 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) \_\_\_

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\_\_\_\_ 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 iddress. If you have any questions regarding this request, please call the Reports Analysis Division toll free at (800) 424-9530. 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.

FEC FORM 12 (Revised April 1977) Page Tho

National Republican Senatorial Committee-Expenditures October 20 Monthly-1978

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.

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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).

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 Cohen Cochran Amstrong Shasteen Durenberger Kassebaum Durenberger Durenberger	Pace 1 of 23 9 of 23 9 of 23 9 of 23 16 of 23 16 of 23 16 of 23 16 of 23 17 of 23	Amount \$1,500 \$127.50 \$75 \$3,000 \$2,090.05 \$305 \$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.

	Washington, D.C. 2046.3
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AN	D EXPENDITURES COVERING THE PERIOD 10/1778 TUROUGH 10/23/73 TUROUGH 10/23/73
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-	Other: Please See Page Two

Your initial submission(s), together with this request for additional information, has been made available (i), 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 (300) 424-0530. The local Wishington, D.C. telephone numbers are (202) 523-4048 (Senate, Non-Party), 523-4172 (Hense) or 523-1474 (Party).

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National Republican Senatorial Constituee-Expenditures 10 Day Pre-General Election Report 1978

The condittee has reported making in-kind contributions to and expenditures on behalf of the Victory '78 Conmittee. Please be advised that this committee is the principal campaign conmittee 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.

The committee has reported making on 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.

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).

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 archded to disclose these expenditures on Schedule F, Line 24.

Please provide appregate general election coordinated expenditures for those candidates on whose behalf the committee made coordinated expenditures, as reported within this report, on Schedule F.

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.

# national Republican Senatorial Committee

UNED 22 11 0 30 UNED 121-1-0 2

Nonorable J. Stanley Kimmitt Office of Public Records 119 D St., N.E. Washington, D.C. 20510

Dear Mr. Kimmitt:

In compliance with correspondence recieved from the Federal Election Commission, dated January 29, 1979, I am enclosing information requested.

October 20, Monthly:

A				See attached Schedule F.
B				See attached Schedule B.
ABC	Paragraph	3	-	See attached Schedule F.
10 1	Day Pre-Gen	2ri	11	
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.
5	Paragraph	4	-	Amended Schedule F attached.
H	Paragraph	5	-	See attached Schedule F.

### Senator Bob Fackwood Chairman, Oregon

MEMBERS Sen, Howard H. Baker, Jr., Tenn, Sen, John R. Oudre, R. L. Sen, Barry Goldwater, Ana. Sen, Ornn G. Haro, Huab Sen, S. I. Harokawa, Calif. Sen, H. John Houa III, Penn, Sen, Ourier McC. Mathuw, Jr., Md. Sen, Miann V., Knib, Jr., Del Sen, Harraum Schnutt, N. M. Sen, Richard S. Schwenker, Penn-Sen, Robert T. Statford, Versmont Sen, Miben R. Youag, N. Dak

Rodney A. Smith

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Honorable J. Stanley dimmitt February 13, 1979 Page 2

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,

Ral H. Smith

Rodney A. Smith Treasurer

RAS:mkh Enclosures I.D. #C002746 .

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# UNDERALI OF CANDID - EL FORFEDERAL OFFICE UNDECATA(d)) (Supporting Line 24, FEC Form 3)

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ITo be used only by Political Committees in the General Electronia

Icame of Political Committee in Full

	Senatorial Committee - Exp			Bally calls
Has your Committee been besignated to ma				INU
If YES, name the designating committee 3 Full Name, Mailing Address and ZIP Code of Each Favee	Name of Federal Candidate Supported, State, District & Office Sought	Pageculars of Expenditure	Date imports, 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
	Apprepare General Election Expenditure for this Candidate - 5		3.0	
Full Name, Mailing Address and ZIP Code of Each Favee	Name of Federal Campidate Supported. State, District & Office Sought	Particulars of Experiorities	Dase imphility GRY, year)	Artiount
National Direct Mail Services 4733 Bethesda Ave. Suite #530	Durenberger for Senate Minnesota	Postage for direct mail services	10/2/78	5,610
Bethesda, Maryland 20014	Apprepate General Election Expenditure			-
Vull Name, Mailing Address and ZIP Code	Name of Federal Condidute Supported. State, District & Office Support	Farticulars of Excenditure	Date Importo, Cay, year)	Amount
holder, Kennedy, Dye & Bell 2020 21st Ave., South Nashville, Tenn. 37212	Martin for U. S. Senate Alabama	Nedia Advertising	10/2/78	50,000
	Aggregate General Election Expenditure for this Candidate - 5 50 010		1	
Full Name, Mailing Address and ZIP Code of Each Favee	Name of Federal Canolcate Supported. State, District & Othice Sought	Particulars of Expenditure	Date Imonth, day, yearl	Amoun
Automated Business Mail 5515 Livingston Road, S.E. Washington, D. C. 20021	Re-elect baker Committee Tennessee -	Postaje	10/2/78*	25
	Apprepare General Election Extenditure for this Cancidate - 5 / 1000 / 2			
Full Name, Mailing Address and 21F Code of Each Paver	Name of Proeral Candidate Subported. State, District & Othice South	Farticulars of Excenditions 1	Den import	Amp.*
Ruth Jones, Ltd. 113 E. 75th Street New York, New York 10021	Bell for Senate Committee New Jersey	Media Advertising	11/1/78	: :5,5; ,
	Appreciate Denergy Electron Easteric runs Ten mills Constant 107		1	1
DUSTOTAL OF excensioners this says less	orial <sup>1</sup>	1.77		1
TOTAL this period light beet this line num				5

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# POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S)

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(2 U.S.C. 441a(d))

(Supporting Line 24, FEC Form 3)

For Line 24, FEC From 3

(To be used only by Folicia: Committees in the General Election)

Name of Folitical Committee in Full

Full Name, Mailing Address and ZIP Code of Each Pavee	Republican National and/or Name of Federal Candidate Supported, State, District & Office Sought	Farticulars of Expenditure	Date imonth, 	Amo
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	\$ 50
	Apprecate General Election Expenditure for this Candidate - \$ / 3 5 / 17			
Full Name, Mailing Address and 21P Code of Each Payee	Name of Federal Candidate Supported. State, District & Office Sought	Particulars of Expenditure	Date imonth, Gry, year)	Amo
Mr. Ed Pinto 6715 New Hope Drive Springfield, Virginia 22151	Brooke Committee Massachusetts	Reimbursement of Expenses	10/3/78	14
	Apprepate General Election Expenditure for this Candidate - \$ 142 330.20			-
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Canoidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	Amo
Congressman Paul McCloskey 208 Cannon Building Washington, D. C. 20515	Williams for Senate Montana	Reimbursement of Expenses	10/3/78	1
	Aggregate General Election Expenditure			
Full Name, Mailing Address and ZIP Code	Aggregate General Election Expenditure for this Candidate - S Name of Federal Candidate Supported, State, District & Office Soucht	Particulars of Expenditure	Date (month, day, year)	
	for this Candidate - 5 Name of Federal Candidate Supported.	Particulars of Expenditure Media Advertising		4,70
of Each Payer Arthur J. Finkelstein & Associates 13 Third Street	tor this Candidate - 5 Name of Federal Candidate Supported. State, District & Office Sought Re-Elect Thurmond Committee		Gay, year)	
of Each Payer Arthur J. Finkelstein & Associates 13 Third Street	tor this Candidate - 5 Name of Federal Candidate Supported. State, District & Office Sought Re-Elect, Thurmond Committee South Carolina Appresate General Electron Expenditure		Gay, year)	4,7
of Each Payer Arthur J. Finkelstein & Associates 13 Third Street Rye, New York 10580	tor this Candidate - 5 Name of Federal Candidate Supported. State, District & Office Sought Re-Elect, Thurmond Committee South Carolina Appresate General Election Expenditure tor this Candidate - 5 / 3 (2.7.2.1.1) Name of Federal Candidate Supported.	Media Advertising	Late Imports.	
of Each Payer Arthur J. Finkelstein & Associates 13 Third Street Rye, New York 10580 Full Name, Mailing Address and ZIP Coor of Each Payer Murphy/Powers Media, Inc. 117 Smith Avenue	tor this Candidate - 5 Name of Federal Candidate Supported. State, District & Office Sought Re-Elect Thurmond Committee South Carolina Appresate General Election Expenditure tor the Candidate - 5 / 3 (2.7.2.1.1.1) Name of Program Candidate Supported. State, District & Other States Re-Elect Thurmond Committee	Media Advertising	Care Importo	4,7

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# POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S) UN EALF OF CANDIDATIC FOR FED. L OFFICE (2 U.S.C. 441a(d)) (Supporting Line 24, FEC Form 3)

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For Long 24, FLC Lam.

(To be used only by Political Committees in the General Election)

Name of Political Committee in Full

If YES, name the designating committee 1 Full Name, Mailing Address and 21P Code of Each Fayee	Name of Federal Candidate Supported, State, District & Office Sought	Farticulars of Expenditure	Date Imposts.	Amour
D. M. S. Postal Escrow Account 7777 Leesburg Pike Falls Church, Va.	Shasteen for Senate Nebraska	Postage	10/4/78	\$ 1,94
	Apprepare General Election Expenditure for this Candidate - 5 21942 05			
Full Name, Mailing Adoress and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date imports, Gey, yearl	Art.out
Rodney A. Smith 4836 South 28th Street Arlington, Virginia 22206	Kansans for Kassebaum Kansas	Reimbursement of Expenses .	10/5/78	25 7
	Aggregate General Election Expenditure for this Candidate - \$ 16549.29	1.2		-
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Feberal Candicale Supported. State, District & Office Soupht	Parsiculars of Expenditure	Date imonth, Gay, yearl	Amou
Rodney A. Smith 4836 South 28th Street Arlington, Virginia 22206	Bell for Senate Committee New Jersey	Reimbursement of Expenses	10/5/78	25
	Aggregate General Election Expenditure for this Candidate - \$ /71,295,96			
Full Name, Mailing Address and 21P Coor of Each Payee	Name of Federal Candidaté Supported, State, District & Office Soupht	Particulars of Expenditure	Date Imonth, day, yearl	Amou
Rodney A. Smith 4836 South 28th Street Arlington, Virginia 22206	Durenberger for Senate Minnesota	Reimbursement of Expenses	10/5/78	1,15
	Appresate General Election Expenditure for this Candidate - \$ 7767.84		ţ	城。
Full Name, Mailing Address and 215 Code of Each Paves	Name of Federal Candidate Supported, State, Cristics & Office Soupht	Particulars of Excenditure	Date imphility care, vearb	400
Rodney A. Smith 4836 South 28th Street Arlington, Virginia 22206	Citizens for Cochran Mississippi	Reimbursezent of Expenses	10/5/78	2:
	Appressie General Election Exophoniule		Pure a	
SUBTOTAL of expenditures this page loans	and the second	Station and some	E 10	1

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### FUELTICAL PARTY COMMITTEES OR DESIGNATED AGENTIST 1 WALF OF CANDIDY IT! FOR LEDERS' OFFICE 1.1.1 1.1

(2 U.S.C 411a(d))

(Supporting Line 24, FEC Form 3)

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(To be used only by Political committees in the General Election)

Name	of	FOILTRAL	Committee in		a selle
	**		Committee in	1.5	<b>U</b> 11

If YES, name the designating committee: 1 Full Name, Mailing Address and 21P Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, Gay, year)	Amoun
Rodney A. Smith 4836 South 28th Street Arlington, Virginia 22206	Re-Elect Baker Committee Tennessee	Reimbursement of Expenses	10/5/78	\$ 848
and the second sec	Appresate General Election Expenditure for this Candidate = \$ 15774 12			
Full Name, Mailing Address and 21P Code of Each Paver	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, Gay, year)	4mour
Rodney A. Smith 4836 South 28th Street Arlington, Virginia 22206	People for Boschwitz Minnesota	Reimbursement of Expenses	10/5/78	707
1	Apprepate General Election Expenditure for this Candidate - \$ 707 62			-
Full Name, Mailing Adoress and ZIF Code of Each Pavee	Name of Federal Candidate Supported, State, District & Office Soupht	Farticulars of Expenditure	Date imonth, day, year)	Amou
American Mailing List 7777 Leesburg Pike Falls Church, Va. 22043	Al Simpson for Senate Wyoming	Direct Mail Services	10/5/78	99 5
	Aggregate General Election Expenditure for this Candidate - 5 3464. 21			
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Souphs	Farticulars of Expenditure	Date Imonth, day, yearl	600
Barre/Lawrence Associates P. O. Box 485 Alexandria, Va. 22313	Warner for Senate Committee Virginia	Consultant Services	10/5/78	1,00
	Appreciate General Election Expenditure			
Full Name, Mailing Appress and 21F Coor of Each Paver	Name of Federal Candicale Suzdorlec. Size, Dirt. 1: & Office Sought	sauce an childrendologi	Date impost. Date impost.	1
Automated Business Mail 5515 Livingston Road.S.E. Washington, D.C. 20021	Re-Elect Baker Committee Tennessee	Typing Services	10/5/78	34
	Appressive General Election Excenditure i appressi General Election Excenditure i			1
SUBTOTAL C! expenditures this sage income				. 5

OUTERAL FARTY COMMITTEES OR DESIGNATED AGENT(S)

Electron Commune 1 1999, N.W. Merch, D.C. 20463

## (2 U.I.C. 441a(d)) (Supporting Line 24, FEC Form 3)

Page 5 of 20-

Fuel ton 24, FLC Form

(To be used only by Political Committees in the General Election)

Name of Folinical Committee in Full

If YES, name the designating committee: ] Full Name, Mailing Address and ZIP Code	Nepublican National and/or Name of Federal Candidate Supported.	Respective State Co	mmittees	DNO
of Each Paver	State, District & Office Soupht	Particulars of Expenditure	Date Umonth. . day, year)	Am
H. A. Post Associates 1028 Connecticut Ave.,N.W Washington, D. C. 20036	Re-Elect Baker Committee Tennessee	Printing Services	10/5/78	\$ 10
Sector Sector	Aggregate General Election Expenditure for this Candicate - \$ 75, 101 1/2			
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Subborted, State, District & Office Souphs	Particulars of Expenditure	Date imports, cay, year)	Arr.
Robert Goodman Agency 12 West Read Street Baltimore, Md.	Committee for Senator Griffin Michigan	Media Advertising	10/5/78	20,0
	Aggregate General Election Expenditure for this Candidate - \$ 142/116 . 74		1.	-
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Farticulars of Expenditure	Date (month, day, year)	Ame
Mr. Ed Pinto 6715 New Hope Drive Springfield, Va. 22151	Brooke Committee Massachusetts	Reimbursement of Expenses	10/5/78	1
	Aggregate General Election Expenditure	*	1.1	-
Full Name, Mailing Address and ZIP Code of Each Payee	for this Candidate - \$ 142.320 20 Name of Federal Candidate Supported. State, District & Office Soupht	Particulars of Expenditure	Date importh, day, year)	Am
Ringe/Russo Associates 120 Boylston Street Suite 408 Boston, Mass. 02116	Brooke Committee Massachusetts	Media Advertising	10/5/78	38,0 5
	Apprepare General Election Expenditure for thir Candidate - \$ 141 2 320 27			6
Full Name, Mailing Address and ZIF Code   of Each Paver	Name of Federal Candidate Supported, State, District & Office Soupht	Persiaulars of Extenditure	Date imposts,	1 600
Betsy Warren 365 Russett Road Chestnut Hill, Mass. 02167	Erooke Cormittee Massachusetts	Reinbursement of Expenses	10/6/78	
	Appreciate General Electricit Excenditions territrix Canologie - 5			1
server that the project state is AT DTEC				. 1

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\* Street, N.W. Street, D.C. 20463

# POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S)

(2 U.S.C. 441; (d))

(Supporting Line 24, FEC Form 3)

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To be used only by Political Committees in the General Election)

fanie of Folitical Committee in Full

ull Name, Mailing Address and ZIP Code	Republican National and/or	Farticulars of Expenditure	Date imposit.	1
of Each Payer	State, District & Office Sought	Particulars of experior of	day, year)	Amo
Market Opinion Research 28 West Adams Detroit, Michigan 48226	Cohen for Senator Victory '78 Maine	Telephone Poll	10/5/78	\$.3
	Aggregate General Election Expenditure for this Candidate - \$ 17325.			
ull Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Soupht	Particulars of Expenditure	Cate imonth, day, year)	Am
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	
	Aggregate General Election Expenditure for this Candidate - 5 78-15.			-
ull Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Soupht	Particulars of Expenditure	Date (month, day, year)	Am
Thomas A. Deffron t/o Cohen for Senator 2. O. Box 1938 Portland, Maine 04104	Cohen for Senator Victory '78 Maine	Consulting Services	10/6/78	
	Aggregate General Election Expenditure for this Candidate - \$ 78,25.			
uli Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Farticulars of Expenditure	Date (month, day, year)	ATT
David R. Ault /o Cohen for Senator 0. 0. Box 1938 Portland, Maine 04104	Cohen for Senator Victory '78 Maine	Consulting Services	10/6/78	
	Apprepare General Election Expenditure for this Candidate - \$ 7525.			Kin-
ull Name, Mailing Appress and ZIP Code of Each Paver	Name of Federal Candidate Supported. State, District & Office Sovent	Farsiculant of Excentionure	Date imphir. Cav, vear)	:
obert S. Tryer /o Cohen for Senator . O. Box 1938 ortland, Maine 04104	Cohen for Senator Victory '78 Maine	Consulting Services	10/6/78	
	Apprepare General Election Experienture for this Candidate - \$ 72.2.2.			ŝ.

# ON THOSE PARTY COMMITTEES OR DESIGNATED AGENT(S)

(2 U L.C. 441a(d))

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# (Supporting Line 24, FEC Form 3)

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(To be used only by Policical Committees in the General Election)

Name of Folitical Committee in Full

Full Name, Mailing Address and ZIP Code of Each Paver	Republican National and/o Name of Feotral Canologie Supported. State, District & Office Soupht	Farriculars of Expenditure	Date imports. Cay, year)	Am
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	\$ 2
	Apprepare General Election Extenditure for this Candidate - 5 7 2 2 2			
Full Name, Mailing Address and 21P Code of Each Payee	Name of Federal Candidate Supported. State, District & Office Soupht	Farticulars of Expenditure	Date Imonth, Gay, year)	A.
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	1,5
	Aggrepate General Election Expenditure for this Candidate - 5 78.25.			-
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Canoidate Supported, State, District & Office Sought .	Particulars of Expenditure	Date (month, Cay, year)	An
Market Opinion Research 28 West Adams Detroit, Michigan 48226	Kansans for Kassebaum Kansas	Telephone Poll	10/5/78	5,0
	Apprepate General Election Expenditure for this Candidate - 5 /6-529 29			
Full Name, Mailing Address and ZIP Cooe of Each Payee	Name of Federal Candidate Subboried, State, District & Office Soupht	Particulars of Expenditure	Date Imphish, cav, year)	An
Elliott Curson Advertising, Ltd. Western Savings Bank Bldg. Philadelphia, Pa. 19107	Bell for Senate Committe New Jersey	e Media Advertising	10/5/78	3,
	Appreciate General Election Expenditure			
Full Name, Mailing Adoress and ZIP Code of Each Paves	Name of Federal Candidate Supported. State, District & Office Soucht	Farsiques: 21 Extenditure	Date Imprish, Gen, veart	4.
didwest Advertising 1024 West Third Street Davenport, Iowa 52802	Friends of Roger Jepsen	Media Advertising	10/f.'î£	20.0
-	Apprearte General Diezhon Extenditure Territet Candidate - 1			
	and the second se	and the second se		

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#### ........... POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S) 1 ... b or 20 UI! I TALF OF CANDIDATES FOR FEDERAL OFFICE

(2 U.S.C. 441a(d)) (Supporting Line 24, FEC Form 3)

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(To be used only by Political Committees in the General Election)

Name of Folisica: Committee in Full

Full Name, Mailing Address and ZIP Code of Each Paver	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, . day, year)	Amo
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,
	Apprepare General Election Expenditure for this Candidate - 5 Tri Fort	فريسيا وتلزيل حقين ومرجع والمكار أتبته		
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Farticulars of Expenditure	Date (month, day, year)	Am
Holder, Kennedy, Dye & Bell 2020 21st Ave., South Nashville, Tenn. 37212	Martin for U.S. Senate Alabama	Media Advertising	10/6/78 	65,
	Aggregate General Election Expenditure for this Candidate - \$250, C.C.C.			-
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Soupht	Particulars of Expenditure	Date imonth, day, year)	4m
Woodward-McDowell & Associates 22 Battery Street Suite 404 San Francisco, Ca. 94111	Humphrey for Senate New Hampshire	Media Advertising	10/10/78	40,
San Francisco, oa. Fair	Appresate General Election Expenditure for this Candidate - 544 563.50			
Full Name, Mailing Address and ZIP Code of Each Paver	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date imonth, day, year)	A7
Eddie Mahe, Jr. 1212 16th Street, N. W. Washington, D. C. 20036	Humphrey for Senate New Hampshire	Reimbursement of Expenses	10/10/78	1,
5	Appresaile General Election Expenditure for this Genologie - 5-41568.550			
Full Name, Mailing Address and 21F Code of Each Payer	Name of Federal Candidate Supported. State, District & Office Sought	Particulars of Expenditure	Date imports, Dat, vear?	
Midwest Advertising 1024 West Third Street Davenport, Iowa 52802	Friends of Roger Jespen Iowa	Media Advertising	10/10/78	25
	Apprepare General Election Expenditure tor this Ginologite - 5 -2011 Mg. 200			

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- Fort an Commission 5 Street, N.W. 19505, D.C. 20463

# ON DEAL PARTY COMMITTEES OR DESIGNATED ALL ON DEATH OF CANDIDATES FOR LEDIELL OFFICE

(2 U.S.C. 441a(d)) (Supporting Line 24, FEC Form 3) Fage 4 of 20

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Inclusive 24, 110 Lorman

(To be used only by Political Committees in the General Election)

Name of Political Committee in Full

Full Name, Mailing Address and ZIP Code of Each Payee	Republican National and/or Nome of Feorral Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date imonin, , day, year)	Amour
Ringe/Russo Associates 120 Boylston Street Suite 408 Boston, Mass. 02116	Brooke Committee Massachusetts	Media Advertising	10/10/78	\$ 43,0 \$
and the second second	Aggregate General Election Expenditure for this Candidate - \$ 14 3 3 70 .20			
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Soupht	Particulars of Expenditure	Date imonth, Dev, yearl	4000
Elliott Curson Advertising, Ltd. Western Savings Bank Bldg. Philadelphia, Pa. 19107	Bell for Senate Committee New Jersey	Media Advertising	10/11/78	3.7
	Aggregate General Election Expenditure for this Candicate - \$ /71.275.96			-
Full Name, Mailing Address and ZIP Code of Each Pavee	Name of Federal Candidate Supported, State, District & Office Souph1.	Particulars of Expenditure	Date (month, day, year)	Amou
Sisk Mailing Services, Inc 9800 George Palmer Highway Lanham, Maryland 20801	Al Simpson for Senate Wyoming	Mailing Services	10/11/78	2,3
	Aggregate General Election Expenditure for this Candidate - 5 3464 21			
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Soupht	Particulars of Expenditure	Date (month, cav, vear)	Amou
Robert Goodman Agency 12 West Read Street Baltimore, Maryland	Committee for Senator Griffiñ Michigan	Media Advertising	10/11/78 - درتدس	29,0
	Appresate General Election Expenditure for this Candidate - \$ 1-1.2.116. 71			
	Name of Federal Candidate Subborred, - State, District & Office Soucht	<ul> <li>Parsiculars of Exclenditure</li> </ul>	Dete imionit. Gen veerl	Amor
ull Name, Mailing Adoress and ZIP Code of Each Pavee				
		Consulting Services	10/11/75	10.0
of Each Pavee McMaster Associates Public Relations 410 Top of Troy Building Troy, Michigan 48084	Committee for Senator Griffin	Consulting Services	10/11/75	10,

# POLITICAL PARTY COMMITTEES OF DESIGNATED AGENT(S)

(2 U.S.C. 441a(d))

(Supporting Line 24, FEC Form 3)

(To be used only by Folicical Committees in the General Election)

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For Line 24, FLC Lonn :

Name of Folitical Committee in Full

The second second and 71P Code	epublican National and/or Name of Federal Candidate Supported.	Farticulars of Expenditure	A second s	
of Each Payee	State, District & Office Sought	Particulars of Expenditure	Date imonth, , day, year)	Amo
Macauley's 15188 West Eight Mile Road Detroit, Michigan 48237	Committee for Senator Griffin Michigan	Office Supplies .	10/11/78	\$ < 88
	Apprepare General Election Expenditure for this Candidate - 5 /			
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported. State, District & Office Sought	Particulars of Expenditure	Care imonit. Car, year)	Amo
Hotel Pontchartrain 2 Washington Boulevard Detroit, Michigan 48226	Committee for Senator Griffin Michigan	Room Accommodations	10/11/78	5,9
	Apprepate General Election Expenditure for this Candidate - \$ 141,2116 79			
Full Name, Mailing Address and ZIP Code of Eech Payee	Name of Federal Candidate - S / 2/ 2/10 //1 Name of Federal Candidate Supported. State, District & Office Soupht	Farticulars of Expenditure	Date (month, day, year)	Amo
Likity-Split Copy Printing 20441 James Couzens Highway Detroit, Michigan 48235	Committee for Senator Griffin Michigan	Printing Services	10/11/78	2,2
, .	t de mitrice de la c	-		2.4
	- Apprepate General Election Expenditure for this Candidate - \$ 142116 79	444.) 		
		Particulars of Expenditure	Daie (monith, Gay, year)	.   Am
Full Name, Mailing Address and ZIP Code of Each Payee Winchester Aviation Cherry Capital Airport	Aggregate General Election Expenditure for this Candidate - \$ 142116-79 Name of Federal Candidate Supported.	Particulars of Expenditure Charter Services	• T 1 C 1 C 1 C 1 R 2 C 1 C 1 C 1 C 1 C 1 C 1 C 1 C 1 C 1 C	1
Full Name, Mailing Adoress and ZIP Code of Each Payee Winchester Aviation Cherry Capital Airport Traverse City, Mich. 49684	Aggregate General Election Expenditure for this Candidate - \$ 192116-79 Name of Federal Candidate Supported. State, District & Office Souphi Committee for Senator Griffin		cay, veer)	Am 2,7
Full Name, Mailing Adoress and ZIP Coor of Each Payee Winchester Aviation Cherry Capital Airport Traverse City, Mich. 49684	Apprepare General Election Expenditure for this Candidate - \$ 192116 79 Name of Federal Candidate Supported, State District & Office Soupht Committee for Senator Griffin Michigan		cay, veer)	2,7
Full Name, Mailing Address and ZIP Code of Each Payee Winchester Aviation Cherry Capital Airport Traverse City, Mich. 49684	Apprepare General Election Expenditure for this Candidate - 5/42/16/79 Name of Federal Candidate Subported, State, District & Office Soupht Committee for Senator Griffin Michigan Apprepare General Election Expenditure for this Candidate - 5/14/11/71 Name of Federal Candidate Supported,	Charter Services	Gay, veer) 10/11/78 Date Imphin,	2,7
Full Name, Mailing Address and ZIP Code of Each Payer Winchester Aviation Cherry Capital Airport Traverse City, Mich. 49684 Full Name, Mailing Address and ZIF Code of Each Payer General Aviation Capital City Airport Lansing, Michigan 48906	Apprepare General Election Expenditure for this Candidate - \$ 192116 79 Name of Federal Candidate Supported. State, District & Office Souphi Committee for Senator Griffin Michigan Apprepare General Election Expenditure for this Candidate - \$ 701 - 116 79 Name of Federal Candidate Supported. State, Datrict & Office Souphi Committee for Senator Griffin	Charter Services	Date imports, can, vearl	2,5

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OLITICAL PARTY COMMITTEES OR DESIGNATE DAGENT(S) ON BOALF OF CANDIDATES FOR FEDERAL OFFICE	1 11
(2 U.S.C. 441a(d)) (Supporting Line 24, FEC Form 3)	In Line 24, FEC Form

(To be used only by Political Committees in the General Election)

Line 24. I EC Form 3

Name of Political Committee in Full

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Full Name, Mailing Address and ZIP Code	Republican National and/or Name of Federal Candidate Supported.	Particulars of Expenditure	Date (month, )	1000
of Each Payer	State, District & Office Soupht	Particulars of Expenditure	. day, year)	Amou
Goettler Associates, Inc. Fifty West Broad Street Columbus, Ohio 43215	Committee for Senator Griffin Michigan	Professional Services	10/11/78 \$	5,00
	Apprepate General Election Expenditure for this Candidate - 5/1/2/11/0 79			
Full Name, Mailing Adoresi and ZIP Code of Each Payee	Name of Federal Candidate Subborsed, State, District & Office Souphs	Farticulars of Expenditure	Date imonin, day, year)	Amo
Executive World Travel 1700 K Street, N. W. Suite 1004 Washington, D. C. 20006	Committee for Senator Griffin Michigan	Travel Expenses	10/11/78	3,02
and all here is	Apprepate General Election Expenditure for this Candidate - 5/42116,79			-
Full Name, Mailing Address and ZIP Code of Each Pavee	Name of Federal Candidate Supported, State, District & Office Sought .	Particulars of Expenditure	Date (month, day, year)	Amo
Printers II 5141 Frolich Lane Tuxedo, Maryland 20781	Committee for Senator Griffin Michigan	Printing Services	10/11/78	5,6
	Aggregate General Election Expenditure for this Cendidate - \$1/42116.79	· · · · · · · · · · · · · · · · · · ·		
Full Name, Mailing Address and ZIP Code of Each Payer	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, cay, year)	Amo
Tri-State Envelope of Maryland, Inc. 6900 Faigle Road Beltsville, Md. 20705	Committée for Senator Griffin Michigan	Envelopes	10/11/78	8
	Aggregate General Election Expenditure for this Candidate - 5 1/1 2111, 79			
ull Name, Mailing Address and 21P Code of Each Paver	Name of Federal Candidate Subborsec, State, District & Office Sought	Particulari di Expenditure	Date imoniti, dax, vear)	Am
Diversified Printing Co. 809 Cameron Street Alexandria, Va. 22314	Committee for Senator Griffin Michigan	Printing Services	10/11/78	3,
1. 18 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	Appresate General Election Expenditure for this Condicate - \$ 14 (111 . 7)	the State Shills		

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# TTEM ID COORDINATED EXPENDITURE .ADL BY POLITICA CARTY COMMITTEES OR DESIGN ED AGENT(S) ON DEMALF OF CANDIDATES FOR FLDENKL OFFICE (2 U.S.C. 441a(d)) (Supporting Line 24, FEC Form 3)

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For Line 24 FLC Form 3

ITo be used only by Folicial Committees in the General Election.

Name O	Po	Hitical	Committee	-	Full
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National	Republican	Senatorial	Committee	-	Expenditures
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Full Name, Mailing Address and ZIP Code	epublican National and/or   Name of Federal Candidate Supported.			
of Each Paver	State, District & Office Sought	Particulars of Expenditure	- day, year)	Amou
Berlin & Jones Co., Inc. P. O. Box 4294 New York, New York 10049	Committee for Senator Griffin Michigan	Envelopes	10/11/78	\$ 3,00
	Apprepate General Election Expenditure for this Candidate - S /			
Full Name, Mailing Address and ZIP Code of Each Payer	Name of Federal Candidate Supported, State, District & Office Sought	Farticulars of Expenditure	Date Imonth, Cay, year)	6000
Stephen Winchell & Associates, Inc. 1990 M Street, N. W. Suite 310	Committee for Senator Griffin Michigan	Direct Mail Consulting	10/11/78	5,0
Washington, D. C. 20036	Apprepate General Election Expenditure for this Candidate - \$ 142116. 74			
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date imonth, day, year)	Amou
Envelopes Unlimited 649 N. Horners Lane Rockville, Maryland 20850	Committee for Senator Griffin Michigan	Envelopes	10/11/78	9
	Apprepare General Election Expenditure for this Candidate - \$ 14,2116.74			
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date imonth, Gay, year)	Amo
General Typographers, Inc. 927 H Street, N. W. Nashington, D. C. 20001	Committee for Senator Griffin Michigan	Printing Services	10/11/78	
	Appresate General Election Excenditure for this Candidate - \$ 142112.71		-	1.31.
ull Name, Mailing Address and 21P Code 1 of Each Paver	Name of Federal Candicate Supported, State, District & Office Soupht	Farsiquiars of superiorisure	Ges veer	400
Hendricks-Miller Typographic Company 2363 Champlain St., N. W. Nashington, D. C. 20009	Committee for Senator Griffin Michigan	Printing Services	10/11/75	
	Appreciate General Election Expenditure		1.100	

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Frequence Communities Street, NW. non, D.C. 21463

### POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S) ON DEALF OF CANDIDATES FOR FEDERAL OFFICE (2 U.S.C. 441a(d))

(Supporting Line 24, FEC Form 3)

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For Line 24, FIC Form .

(To be used only by Political Committees in the General Election)

Isame of Folitical Committee in Full

of Each Payer         Sitt, Durier & Office Souphi         ory.ves/           Mattera Litho., Inc.         Committee for Senator         Printing Services         10/11/78         1,10           Sitz Prolin Lane         Original         Printing Services         10/11/78         1,10           Sitz Payer         Mathematical         Approxit Control Expenditure         Printing Services         10/11/78         1,20           Full Name, Mailing Address and 20P Cost of Each Payer         Name of Footal Candost - 5 // 1/16, 7/         Patterian of Expenditure or Expenditure - 5 // 1/16, 7/         Patterian of Expenditure or expenditure - 5 // 1/16, 7/         Autopen Matrix         10/11/78         11           Autopen International         Committee for Senator Griffin         Autopen Matrix         10/11/78         11           Approxit General Exection Expenditure or uni Conduct - 5 // 1/2/16, 7/1         Autopen Matrix         10/11/78         11           Communications Corp. of America         Name of Footal Expenditure for this Conduct - 5 // 1/2/16, 7/1         Direct Mail         10/11/78         16           I Direct Marketing Plaza Boston, Virginia 22713         Committee for Senator Griffin         Direct Mail         10/11/78         16           Metro Printing 8446 Lee Highway Fairfax, Virginia 22030         Committee for Senator Griffin         Printure Services         10/11/78         2,03<				
5124 Frolich Lane	Griffin	Printing Services	10/11/78 \$	1,10
	for this Candidate - 5 11 111. 7.1			
	determining committee:       Republican National and/or Respective State Committees         start, Durnet & Concent Support       Name of Ferral Enclose Support       Particular of Expenditure       Committee for Senator         Each Paver       Committee for Senator       Printing Services       10/11/78       1,100         Apprent General Enclion Expenditure       Particular of Expenditure       Committee for Senator       Farticular of Expenditure       Committee for Senator         Start During & Officer Support       Start During & Officer Support       Farticular of Expenditure       Committee for Senator       Farticular of Expenditure       Committee for Senator         Start During & Expenditure       Committee for Senator       Farticular of Expenditure       Committee for Senator       Farticular of Expenditure       Committee for Senator         Start During & Expenditure       Start During & Expenditure       Date Imonth, Expenditure       Committee for Senator         Start During & Committee for Senator       Direct Mail       10/11/78       163         Start During & Expendurine			
3121 Washington Blvd.	Griffin	Autopen Matrix	10/11/78	1
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America 1 Direct Marketing Plaza	Griffin		10/11/78	, 1 ,
	Name of Federal Candicate Supported,	Particulars of Expenditure		Amo
8446 Lee Highway	Griffin	Printing Services	10/11/78	2,0
	Name of Feotral Canolicale Supported,	Famiculan d'Expenditure	17772 (1777) (1777) (1777) (1777)	4m(
	State, District & Differ Southt	the second se		
of Each Pever Automated Correspondence Systems 2120 L Street, N. W.	Committee for Senator Griffin	Typing Services	10/11/78	5,1

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### ON BELLALF OF CANDIDAVIS FOR FEDERAL OFFICE

(2 U.L.C. 243a(d))

(Supporting Line 24, FEC Form 3)

Do be used only by Political Commitmees in the General Electured

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Tiame of Political Committee in Full

Has your Committee been designated to max If YES name the designating committee: R	e coordinated expenditures by a political	Darty committee?		ONC
Full Name, Mailing Address and ZIP Code	Name of Federal Candidate Supported,	Farticulari of Expenditure	Date imports	Amou
of Each Paver	State, District & Office Soupht		Day, year)	
Sisk Mailing Services, Inc 9800 George Palmer Highway Lanham, Marylano 20801		Mailing Services	10/11/78	\$ 7,
States and states and	Appreprie General Election Extenditure for this Candidate - 5 / 111 - 74			
Full Name, Mailing Address and ZIP Code of Each Paves	Name of Federal Candidate Supported, State, District & Office Soupht	Particulars of Expenditure	Date imonin, Day, vear)	Amo
Wiland & Associates 219 East Davis Street Culpeper, Virginia 22701	Committee for Senator Griffin Michigan	Computer Services	10/11/78	10,
	Apprepate General Election Expenditure for this Candidate - \$ 142116. 74			
Full Name, Mailing Acoress and 21P Code of Each Pavee	Name of Federal Candidate Supported, State, District & Office Bought	Particulars of Expenditure	Date (month, day, year)	Amo
Eastern Airlines National Airport Washington, D. C. 20001	Kansans for Kassebaum Kansas	wir Freight Service	10/11/78	
- <sup>*</sup> 4	Apprepare General Election Expenditure for this Cendicate - 5 16549 29			1
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Subborted, State, District & Office Soupht	Farticulars of Expenditure	Date Imonth, day, year)	Am
Romanek Gclub & Co. 8 S. Michigan Ave. 625 N. Michigan Ave. Chicago, Illinois 60611	Citizens for Percy Illinois	Rent & Utilities	10/11/78	1,
	Apprepare General Election Expenditure			
Full Name Mailing Appress and 21P Cope   of Each Paves	Name of Federal Condicate Subbories. Sizie, District & Office Soucht	Lander of the state of the	Law smonth, Day years	**
Holiday Inn 1-37 at Illinois 13 Marion, Illinois 62959	Citizens for Percy Illincis	Botel Accompdations	10/11/78	
	Appreciate General Election Expenditure for the Canolicate - 5 / 1/2/2			1.1
SUSTETAL el expensiones this says lestier	141		Sala	1

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### FOLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S) ON BLACK OF CANDIDATES FOR FEDERAL OFFICE (2 U.S.C. 441a(6)) (Supporting Line 24, FEC Form 3)

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For Line 24, FEC Form 3

ITe be used only by Political Committees in the General Election!

Name of Folitical Committee in Full

			Date imonth,	Amo	
National Direct Mail Services Suite 530 4733 Bethesda Avenue	Citizens for Percy Illinois	Direct Mail Services		\$ 2,52 J	
20014	Appreciate General Stection Expenditure for this Candidate - \$7.5.1.1.5	1			
of Each Payee     State, District & Office Soupht     dev. vearl       National Direct Mail     Citizens for Percy     Direct Mail Services     10/11/78     \$ 2,52       Services     Illinois     J       Suite 530     4733 Bethesda Avenue     J     J       Bethesda, Maryland     20014     Apprepair General Election Expenditure     Citizen Services	Particulars of Expenditure	and the second se	Amo		
	Amo				
	123 E. 75th Street	Committee	Media Advertising	10/12/78	40,0
	Name of Federal Candidate Subported.	Particulars c: Expenditure		Am	
Committee for Senator Griffin 333 West Fort Street	Griffin	& Reinbursed	10/13/78	4,2	
	for this Canpidate - 5 / 1 11/ 11		Date (month, - dry, year)         Am           Caste (month, - dry, year)         Am           Caste (month, - dry, year)         Am           Caste (month, - dry, year)         Am           Date (month, - dry, year)         Am           IO/12/78         40,0           Date (month, - dry, year)         Am           IO/13/78         4,2           IO/13/78         4,2           IO/12/76         Am           IO/12/78         4,2		
Instruct Commute been ourganed to mark concents sturenoute to bound a park commute?         Exists         Divertige           Hy Eds. meet the existence committee Bound is commute?         Exists         Divertige         Fail Name, Maine Address and 200 Coar         Fail Name, State Committee State Committee State Committee         Fail Name, Maine Address and 200 Coar         Fail Name, State Committee State Committee State Committee         Fail Name, Name of Expension         Cat immoni, And Car, State Committee           National Direct Mail         Citizens for Percy         Direct Mail Services         10/11/78         5.2,           Surit, Diriving Office         Direct Mail Services         10/11/78         5.2,           Surit, Diriving Office         Fail Name, State Committee         Princular of Expension         Car, serving           Full Name, Maine Address and 200 Coar         Appressis General Expension         Princular of Expension         Car, serving           Full Name, Maine Address and 200 Coar         Citizens for Percy         Notel Accommodation         10/11/78         1,           Sour East Ohio Street         Citizens for Percy         Illinois         Princular of Expension         Car, serving         -           Grig Name, Maine Address and 200 Coar         East Perce         Citizens for Percy         Princular of Expension         Car, serving           Sour East Ohio Street         Cole	1 47				
3831 38th Street		••	10/13/78		
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# UN FEHALF OF CANDIDATES FOR FEHAL OFFICE

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### (Supporting Line 24, 1 LC Form 3)

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IT o be used only by Political Committees in the General Election)

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If YES, name the designating committee [ Full Name, Mailing Appressions 21F Cope of Each Payee	Name of Federal Candidate Supported, Stete, District & Office Souphi	Particulars of Expenditure	Dere imposin. day, yearl
Woltz & Associates 520 West Franklin Street Richmond, Virginia 23220	Warner for Senate Committee Virginia	Media Advertising	10/16/78
	Apprepare General Election Expenditure		
Full Name, Mailing Appress and 21P Code of Each Pavee	Name of Federal Candida is Supported. State: District & Office Soupht	Particulars of Expenditure	Date Imonin, Ges. yearl
Mary Mower National Republican Senatorial Committee 227 Massachusetts Ave.,N.E.	Brooke Committee Massachusetts	Expense Advance	10/16/78
Washington, D. C. 20002	Apprepare General Election Expenditure for this Candidate - \$ 14,2330,20		1
Full Name, Mailing Address and ZIP Code of Each Pavee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Dese Imonsh, day, yearl
Pine In			
Ringe/Russo Associates 120 Boylston Street Suite 408 Boston, Mass. 02116	Brooke Committee Massachusetts	Media Advertising	10/16/78
120 Boylston Street Suite 408	Massachusetts	Media Advertising	10/16/78
120 Boylston Street Suite 408	Massachusetts	Media Advertising Particulars of Expenditure	Date (monin, Grv. vear)
120 Boylston Street Suite 408 Boston, Mass. 02116 Full Name, Mailing Adoress and ZIP Code	Massachusetts Apprepare General Election Expenditure for this Candidate - 5 142320.20 Name of Februal Candidate Supported.		Gale (monsh)
120 Boylston Street Suite 408 Boston, Mass. 02116 Full Name, Mailing Address and ZIP Code of Each Pavee Swanson, Sinkey & Ellis 1222 P Street	Massachusetts Appreprie General Election Expenditure for this Candidate - 5 142320.20 Name of Feorral Candidate Supporter. State District & Office Sought Shasteen for Senate	Parsiculars of Expenditure	Gate (monsh, Gav, vear)
120 Boylston Street Suite 408 Boston, Mass. 02116 Full Name, Mailing Address and ZIP Code of Each Pavee Swanson, Sinkey & Ellis 1222 P Street	Massachusetts Apprepaie General Election Expenditure for this Candidate - 5 /4/23/20.20 Name of Feorial Candidate Subborsec. State, District & Office Sought Shasteen for Senate Nebraska Appresate General Election Expenditure	Parsiculars of Expenditure	Gate (monsh, Gav, vear)
120 Boylston Street Suite 408 Boston, Mass. 02116 Full Name, Mailing Adoress and ZIP Coor of Eath Payee Swanson, Sinkey & Ellis 1222 P Street Lincoln, Nebraska 68508	Massachusetts Apprepaie General Election Expenditure for this Candidate - 5 14,23,20.20 Name of Feorral Candidate Supported. State, District & Office Sought Shasteen for Senate Nebraska Appresete General Election Expenditure for this Candidate - 5741741,005 hame of Feoeral Candidate Supported.	Particulars of Expenditure Nedia Advertising	Date (month, Crv. vear) 10/16/78

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Cliers, PCW	(2 U.S.C. 4414(d))
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(Supporting Line 24, FEC Form 3)

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10/17/78

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Date imonth.

Cay year)

10/19/78

To be used only by Policical Commintees in the General Liection,

Isome of Political Committee in Full National Republican Senatorial Committee - Expenditures Has your Committee been designated to make copro-nated expenditures by a political party committee? If YES name the designating committee Republican National and/or Respective State Committees Full Name, Mailing Address and ZIP Coor Name of Feneral Candidate Supported, Farticulars of Expenditure of Each Paver State, District & Office Sought Atkinson Advertising Oklahomans for Bob Kamm | Media Advertising Associates Oklahoma 5500 N. Western, Suite 101A Oklahoma City, Oklahoma 73118 Apprepare General Election Expenditure tor this Candidate - 5 - 5 5170 Full Name, Mailing Acoress and ZIP Code Ivame of Federal Candidate Subborted, Particulars of Expenditure of Each Payee State, District & Office South: Communication Specialists Texans for Tower Direct Mail P. O. Box 1529 Services Austin, Texas 78767 Apprepate General Election Expenditure for this Candicate - 5 175000. Name of Federal Candidate Supported. Farticulars of Expenditure Full Name, Mailing Address and ZIP Code State, District & Office Souths of Each Fayee Ruth . ones, Ltd. Bell for Senate Media Advertising 123 E. 75th Street Committee

New York, New York 10021 New Jersey Apprecase General Election Expenditure 101 this Candidate - 5 171298.96 Full Name, Mailing Address and ZIP Code Name of Federal Candicate Supported. Perticulars of Expenditure Date Imonth, Amoun State, District & Office Soupht Cav. vearl of Each Paver Holder, Kennedy, Dye 6 Martin for U. S. Senate Alabama. Media Advertising |10/19/78 Bell 29,500 2020 21st Ave., South Nashville, Tenn. 37212 Apprecase General Eletsion Expenditure tor this Cano orte - 5 TACICITY. Namis of Federal Candidate Supported Partie, att o Expenditure Life imparts. Full Name, Maring Accress and ZIF Cook E-DOW State, District & Office Soupht \$11. 117 c' Eath Faver Xerox Corporation P. O. Box 96300 Citizens for Fercy Office Eculopent 10/10/78 35 Chicago, Illinois 60693 lilinois

Aspressie General Exection Expensione . tor it a Cansidate - \$ / A-Th t SUBTOTAL C' expenditures this dept includes ŝ

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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 Ceneral Direction)

Name of Fornical Committee in Full

If YES, name the designation committee Full Name, Mailing Appress and 21P Code	Name of Federal Candidate Supported.	Fathering of a penditure		-
of Each Favre	Siere, District & Office Souphi		CIV. YEAR)	Amoun
Capitol Hill Club 300 First Street, S. E. Washington, D. C. 20003	Citizens for Percy Illinois	Reception	10/19/78	\$ 9
	Appreçate General Election Expenditure for this Cendicate - 5 /	Reception     10/19/78     \$ 97       Reception     10/19/78     \$ 97       Pathtulars of Expenditure     Date impoint, Amount cay, yearl       Insurance (Workmen's Compensation)     10/19/78     91       Pathtulars of Expenditure     Date impoint, Amount cay, yearl       Pathtulars of Expenditure     Date impoint, Amount cay, yearl       Compensation)     0/19/78     \$ 07       Computer Services     10/19/78     \$ 07       Pathtulars of Expenditure     Date impoint, Cay, yearl     Amount cay, yearl       Computer Services     10/19/78     \$ 190       Pathtulars of Expenditure     Date impoint, Cay, yearl     Amount cay, yearl       Office Supplies     10/19/78     \$ 190       Pathture Extenditure     Car, yearl     Amount cay, yearl       Consulting and Expenses     \$ 10/19/78     \$ 2,820		
Full Name, Mailing Address and 21F Code of Each Payre	Name of Feotral Canoloate Supported. State, District & Office Soupht	Farticulais di Expenditure	State Committees         xDenditure       Date (month, Gry, year)       Amnount Gry, year)         +Denditure       Date (month, Gry, year)       Amnount Gry, year)         +Denditure       Date (month, Gry, year)       Amnount Gry, year)         ion)       10/19/78       91         ion)       10/19/78       91         xDenditure       Date (month, Gry, year)       Amnount         xDenditure       Date (month, Gry, year)       Amount         xDenditure       Date (month, Gry, year)       <	
George Herrman & Company 125 South Wacker Drive Chicago, Illinois 60606	Citizens for Percy Illinois	(Workmen's	10/19/78	9
	Apprepare General Election Expenditure for this Cendicere - \$ 1.3525.85	1		
Full Name, Mailing Address and ZIP Code of Each Pavee	Name of Federal Candidate Supported, State, District & Office Soupht			Amoun
Carpenter Computer Service, Inc. 2775 Algonquin Road Rolling Meadows, Illinois 60008	Citizens for Percy Illinois	Computer Services	10/1.9/78	80
	Aggregate General Election Expenditure for this Candidate - \$ 135.05 75			1.4
- Full Name, Nailing Address and ZIP Code of Each Payee	Name of Federal Candidate Subborted, State, District & Office Sought	Farticulars of Expenditure		Amour
Crown Office Products Co. P. O. Box 95252 Chicago, Illinois 60690	Citizens for Percy Illinois	Office Supplies	10/19/78	19
	Apprepara General Election Expenditure		1	
Full Name, Mailing Address and 21F Code of Each Faver	Name of Federal Candidate Subboried State District & Office Soupht	Particulary a Disbendition		AT10.
Mr. Ed Pinto 6715 New Hope Drive Springfield, Virginia 22151	Brooke Committee Massachusetts	Reizbursement of	10/19/78	2,82(
	Appreciate General Election Excenditure tor this Canolicate - 5 -		Laboration	
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### ON PENALE OF CANDIDATES FOR FEDERAL OFFICE

(2 U.S.C. 4412(d))

(Supporting Line 24, FEC Form 3)

(To be used only by Political Committees in the General Liertein)

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Iserie of Folisical Committee in Full

Elliott Curson Advertising, Ltd. 1001 Western Savings Bank Building Philadelphia, Pa. 19107       Bell for Senate Committee New Jersey       Media Advertising       10/19/78       \$         Appresare General Election Expenditure of Each Paver       Appresare General Election Expenditure State. Duniet & Office Souper       Ferticular of Expenditure Curver       During Advertising       10/19/78       \$         Aloysius, Butler & Clark 1211 French Street Wilmington, Delaware 19801       Baxter for Senate Delaware 19801       Media Advertising       10/19/78         Foul Name, Maling Address and 21P Coor of Each Paver       Name of Foural Candidate Support. State. During & Souper       Fericulars of Expenditure Curver       Curver         Rick Elliott, Inc. 1306 N. Clayton Wilmington, Delaware 19806       Baxter' for Senate Delaware       Media Advertising 10/19/78       10/19/78         Full Name, Maling Address and 21P Coer of Each Paver       Name of Foural Candidate Support. State. During & Souper       Fericulars of Expenditure Curver       Curver         Rick Elliott, Inc. 1306 N. Clayton Wilmington, Delaware 19806       Baxter' for Senate Delaware       Media Advertising 10/19/78       10/19/78         Full Name, Maling Address and 21P Coer of Each Paver       Name of Foural Candidate Supporter. State. During & Souper Supporter       Fericulars of Expenditure Curvers       During Travel Supporter         Full Name, Maling Address and 21P Coer of Each Paver       Name of Foural Candular Supporter       Fericulars of E	Full Name, Mailing Address and ZIP Code	Name of Federal Candidate Supported.	Farticulars of Expenditure	Cris imonin.	-
Advertising, Ltd.       New Jersey       Media Advertising       10/19/78         Sank Building       Philadelphia, Pa. 19107       Apprear Green Encontenenting       Media Advertising       10/19/78         Full Name, Maling Apprear Green Election Expenditure of Each Faver       Iname of Formal Canders - 5 /71/2/16 /1/2       Media Advertising       10/19/78         Aloysius, Butler & Clark 1211 French Street       Baxter for Senate Delaware       Media Advertising       10/19/78         Full Name, Maling Apprear Green Election Expenditure to the Canders - 5 36 Md0 30       Perturne of Expenditure for the Canders - 5 36 Md0 30       Perturne of Expenditure for the Canders - 5 36 Md0 30       Dutter Expenditure for the Canders - 5 36 Md0 30         Full Name, Maling Apprear of Formal Canders & 5 36 Md0 30       Fautoware of Expenditure for the Canders - 5 36 Md0 30       Dutter Expenditure for the Canders - 5 36 Md0 30         Full Name, Maling Apprear of Formal Canders & 5 36 Md0 30       Fautoware of Expenditure for the Canders - 5 36 Md0 30       Dutter Expenditure for the Canders - 5 36 Md0 30         Rick Elliott, Inc. 1306 N. Clayton Wilmington, Delaware 19806       Baxter' for Senate Delaware       Media Advertising 10/19/78       Dutter Media Advertising       Dutter Moning for Neme Malore Canders & S 200 Media for Neme M	of Each Paver	State, District & Office Soupht		Cav. vearl	
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1211 French Street       Baxter for Senate       Media Advertising       10/19/78         Wilmington, Delaware       19801       Appresate General Election Expenditure       Media Advertising       10/19/78         Full Name, Mailing Address and ZIP Coor       Name of Federal Candidate - 5, 37,840,57       Famiculars of Expenditure       Date Imonth, day, veril         Rick Elliott, Inc.       1306 N. Clayton       Baxter for Senate       Media Advertising       10/19/78         Wilmington, Delaware       19806       Baxter for Senate       Media Advertising       10/19/78         Full Name, Mailing Address and ZIP Coor       Baxter for Senate       Media Advertising       10/19/78         Full Name, Mailing Address and ZIP Coor       Baxter for Senate       Media Advertising       10/19/78         Full Name, Mailing Address and ZIP Coor       Name of Federal Candidate Supported, State Delaware       Famiculars of Expenditure       Date Imonth, day, veril         King Travel Service       Name of Federal Candidate Supported, State Dusing & Office Sodyn:       Famiculars of Expenditure       Date Imonth, cav, veril         King Travel Service       Kansans for Kassebaum       Airling Tickets       10/19/78       10/19/78         Four Name, Maine, Address and ZIP Coar       Name of Federal Election Expenditure       Famiculars of Expenditure       Date Imonth, cav, veril			Particulais of Expenditure	10 100 000 000 000 000 000 000 000 000	-
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1306 N. Clayton       Baxter for Senate       Media Advertising       10/19/78         Wilmington, Delaware       19806       Aggregate General Election Espenditure       Media Advertising       10/19/78         Full Name, Mailing Address and ZIP Code of Each Payee       Name of Federal Candidate Supported. State, District & Office Solght       Farticulars of Expenditure       Diste Imonth. cay, year)         King Travel Service The King Building P. O. Box 1494 Topeka, Kansas 66601       Kansans for Kassebaum Kansas -       Airling Tickets       10/19/78         Full Name, Maing Address and ZIP Code the init Candidate Supported.       Kansans for Kassebaum Kansas -       Airling Tickets       10/19/78         Full Name, Maing Address and ZIP Code the init Candidate - S 1/(-5-47), 2/1       Airling Tickets       10/19/78         Full Name, Maing Address and ZIP Code C' Each Payee       Kans of Federal Election Espenditure ter init Candidate - S 1/(-5-47), 2/1       Full control Expenditure ter init Candidate - S 1/(-5-47), 2/1         Full Name, Maing Address and ZIP Code C' Each Payee       Name of Federal Endicite Supported. State District & Office Scientific       Funde price Expenditure Control & State District & Office Scientific         Robert Goodman Agency 12 West Read Street       Moore for U. S. Senate West Virginia       Media Advertising       10/20/78	OI EACH PAYER	State, District & Office Sought		Cay, years	
Iter this Candidate - S. 38 [240.57]         Full Name, Mailing Address and ZIP Code of Each Payee       Name of Federal Candidate Supported. State, District & Office Sodght       Farticulars of Expenditure       Date tmonth, cay, year)         King Travel Service The King Building P. O. Box 1494 Topeka, Kansas 66601       Kansans for Kassebaum Kansas -       Airling Tickets       10/19/78         Appresate General Election Expenditure tor this Candidate Supported. C Each Payee       Kansans for Kassebaum Kansas -       Airling Tickets       10/19/78         Full Name, Maring Address and ZIP Code of Each Payee       Kanses of General Election Expenditure tor this Candidate - S 16.5247.27       Farticularis Electioned Expenditure tor this Candidate Supported.         Full Name, Maring Address and ZIP Code of Each Payee       Name of Federal Candidate Supported.       Farticularis Electioned Expenditure tor this Candidate Supported.       Farticularis Electioned Expenditure tor this Candidate Supported.         Robert Goodman Agency 12 West Read Etreet       Moore for U. S. Senate West Virginia       Media Advertising       10/20/78	1306 N. Clayton Wilmington, Delaware		Media Advertising	10/19/78	
Full Name, Mailing Address and ZIP Code of Each Pavee       Name of Federal Candidate Supported. State, District & Office Sought       Particulars of Expenditure (avy, vear)       Date Imonth, cav, vear)         King Travel Service The King Building P. O. Box 1494 Topeka, Kansas 66601       Kansans for Kassebaum Kansas -       Airling Tickets       10/19/78         Appresent General Election Expenditure tor this Candidate - S //		Apprepare General Election Expenditure for this Candicate - 5.38 240.57			
The King Building       Kansas         P. O. Box 1494       For the second		Name of Federal Candidate Supported,	Farticulars of Expenditure		-
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ct Each Paver         State Dataset & Office Scopht         Ges. verti-           Robert Goodman Agency         Moore for U. S. Senate         Media Advertising         10/20/76           10 West Read Street         West Virginia         Media Advertising         10/20/76		101 this Candicase - \$ 16-549.21		1 . 18	
12 West Read Street West Virginia			Parsica an or Experionare	and the second se	-
	12 West Read Street		Medfa Advertising	10/20/76	-
Apprepate General Election Expenditure : toristin Candidate - 5 - 4.7 (14/1)	3			1	

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Coupportine Line 24, FEC Feet

(To be used only by Political Committees in the General Liegson)

frame of Fornical Committee in Full

National Republican Senatorial Committee - Expenditures has your Committee been designated to make coordinated expenditures by a political party committee? E YES DNU If YES, name the designations committee Republican National and/or Respective State Committees Name of Federal Candidate Supported, | Full Name, Mailing Address and ZIP Code Particulars of Expenditure Date imposin. Ame of Each Paver State, District & Office Sought Cer. year) Robert Goodman Agency 12 West Read Street Kansans for Kassebaum Media Advertising 10/20/78 \$ 10.0 Baltimore, Maryland Kansas Appreciate General Election Expenditure for this Candidate - 5 /1 5 11 5 Full Name, Mailing Address and ZIP Code Name of Federal Candidate Supported. Particulars of Expenditure Late importe Artic of Each Paver State, District & Office Sought Cir. vearl Betsy R. Warren Brooke Committee -Fundraising 2804 Dumbarton St., N. W. Massachusetts Consultant fee 10/5/78 2,50 Washington, D. C. 20007 Apprecate General Election Expenditure in for this Candidate - \$ 142 3.20 .20 10 10 02 10 50 20 PC Full Name, Mailing Accress and 21P Code Name of Federal Candidate Supported. Farsiculars of Expenditure Dair imposts. Amo of Each Paver State, District & Office South1 Day, year) Apprepare General Election Expenditure for this Candidate - S Full Name, Mailing Address and ZIP Code Name of Federal Candidate Supported. ! Particulars of Expenditure Date Imonth. Amo of Each Pavet State, District & Office Soupht cas, vearl Accrecate General Election Expenditure 10" This Cano-call - 5 Full Name, Mailing Acoress and 21P Coor Name of Feberal Candidate Supported. Particiant & Experionale Dare imightente 4 min et East Pavet State, District & Critice Sought Sec. 1921 Astressie General Election Expenditure ; ter this Canoidate - 5 e SUETOTAL CLEASERS fores this paper locational 1 1275.5 TOTAL " I DIVES WHIT DEDE THIS HAS AN TOP OF ....

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Frank, 1978 Frank Electron Commission

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### THEN DECOMMENDED ENDED THE ADE BY FOLLITICAL PARTY COMMENTERS OR DESIGNATED AGENT(S) ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE (2 U.S.C. 441a(d))

(Supporting Line 24, FEC Form 3)

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(To be used only by Political Committees in the General Lifetium)

Name of Political Committee in Full

If YES, name the designating committee: Full Name, Mailing Address and ZIP Code	Name of Federal Candidate Supported.	Particulars of Expenditure	Date (month, )	Amount
OI Each Payee	State, District & Office Sought	Particulars of Experior of	day, year)	Amban
Steven Saunders Natl. Republican Sent. Comm. 227 Massachusetts Ave., N.E. Washington, D.C. 20002		Salary	3-30-78	15.
and the second	Aggregate General Election Expenditure for this Candidate - S		14-22	
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)	Arhoun
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
	for this Candidate - S			
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)	Amou
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
	Aggregate General Election Expenditure for this Candidate - S			
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)	Amou
Rodney A. Smith 4836 South 28th Street Arlington, VA 22206	Allocated expnditure to Friends of Roger Jepsen (IA, Senate) (consulting and expenses)	& g Expenses	8-3-78	531
	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 Imprith, day, year)	4ma
4836 South 28th Street Arlington, VA 22206	Allocated expenditure to People for Boschwitz (MN, Senate)(Consulting and expenses)	Consulting & Expenses	8-3-78	531
	Appreciate General Election Expenditure			

Clubble F ary, 1928 Stat Election Commission 1935, Street, N.W. Hungton, D.C. 20463

### POLITICAL COORDINATED EXPENDITURE CADE BY POLITICAL CARTY COMMITTEES OR DESIGNATED AGENT(S) ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE (2 U.S.C. 441a(d)) (Supporting Line 24, FEC Form 3)

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For Line 24, FTC Linn 3

(To be used only by Polnical Committees in the General Lincound

the second se		_	_		
Name of	Political	Commi	ttee in	Full	

Full Name, Mailing Address and 21P Code of Each Payce	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Experiorure	Date (month, day, year)	An
Rodney A. Smith 4836 South 28th Street Arlington, VA 22206	Allocated expenditure to Cochran for Senate, MS (Consulting & expenses)	Consulting & Expenses	8-3-78	28
	Apprepare General Election Expenditure for this Candidate - S			
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)	40
Rodney A. Smith 4836 South 28th Street Arlington, VA 22206	Allocated expenditure to Obenshain for Senate, VA (Consulting & Expenses)	Consulting & Expenses	8-3-78	2
	Aggregate General Election Expenditure for this Candidate - \$			
Full Name, Mailing Address and ZIP Code	Name of Federal Candidate Supported,	Particulars of Expenditure	Date (month,	An
of Each Payee	State, District & Office Sought	//	day, year)	
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	8
	Aggregate General Election Expenditure for this Candidate - S			
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sodght	Particulars of Expenditure	Date (month, day, year)	A
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 9-28-78	21
1 <sup>20</sup>	Austrante General Liction Expenditure	1	1	
Full Name, Mailing Address and ZIP Coste of Each Pavee	Tor this Candidate S Name of Federal Candidate Supported, State, District & Office Sought	Particular of Expenditure	Date Importh, day, year)	Δ.
John Mooring Natl. Republican Sent. Comm 227 Massachusetts Ave., N.E Washington, D.C. 20002		Videotaping	Sept. '78	2
-	Administe General Eliction Expenditure for this Candidate - \$			
SUBTOTAL of extend tures this page (out a			×	s

at Linction Commission

-1 K Street, NW. Hungton, D.C. 20463

### POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S) ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE (2 U.S.C. 441a(d))

For Line 24 FEC Form 3

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(Supporting Line 24, FEC Form 3)

(To be used only by Political Committees in the General Election)

Has your Committee been designated to mak	e coordinated expenditures by a political pa		YES D	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)	Amoun
John Mooring Natl. Republican Sen. Comm. 227 Massachusetts Ave., N.E Washington, D.C. 20002	. Wyoming (videotaping)	Videotaping	Sept. '78	25.0
	Aggregate General Election Expenditure for this Candidate - S		1.1	
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)	Amoun
Communications Televideo Lt 918 Sligo Ave. Silver Spring, MD 20910 ·	d. In-kind contribution to Simpson for Senate WY (videotape cassetts)	Videotape Cassette	Sept. '78	23.00
	Aggregate General Election Expenditure for this Candidate - S	and the second second		
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)	Amoun
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	Aggregate General Election Expenditure for this Candidate - S		5 × 1	
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date imonth, day, yearl	Amour
	Aggregate General Election Expenditure for this Candidate - \$			
Full Name, Mailing Address and ZIP Code of Each Pavee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date tmonth. day, yearl	Amour
	Apprepate General Election Expenditure			
And a second sec	tor this Candidate - \$			

HETERET P VISED Vary, 1978 Hat Election Commission 25 K Street, N.W. Vilington, D.C. 20463

### ITEMIZED EXPENDITURES

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Operating, Transfers Out, Contributions In-Kind, Loans, Loan Repayments and Refunds Madel Supporting Lines 20a, 2 ra. and 22a, 22b, and 22c of FEC FORM 3  $\frac{1}{1} = \frac{1}{1 + 1} = \frac{1}$ 

(Live Separate Schedules for each numbered line)

Full Name, Mailing Address and 2IP Code     Particulars of Expenditure for: Primary □General □Other     Date Imoniti, day, year)     Amount of each expenditure for: Primary □General □Other       Full Name, Mailing Address and 2IP Code     Particulars of Expenditure Primary □General □Other     Date Imoniti, day, year)     Amount of each expenditure ture this period       Full Name, Mailing Address and 2IP Code     Particulars of Expenditure Primary □General □Other     Date Imoniti, day, year)     Amount of each expenditure ture this period       Full Name, Mailing Address and 2IP Code     Particulars of Expenditure Primary □General □Other     Date Imoniti, day, year)     Amount of each expenditure ture this period       Full Name, Mailing Address and 2IP Code     Particulars of Expenditure Primary □General □Other     Date Imoniti, day, year)     Amount of each expenditure ture this period       Full Name, Mailing Address and 2IP Code     Particulars of Expenditure Primary □General □Other     Date Imoniti, day, year)     Amount of each expenditure ture this period       Full Name, Mailing Address and 2IP Code     Particulars of Expenditure Primary □General □Other     Date Imoniti, day, year)     Amount of each expenditure ture this period       Full Name, Mailing Address and 2IP Code     Particulars of Expenditure Primary □General □Other     Date Imoniti, day, year)     Amount of each expenditure ture this period       Full Name, Mailing Address and 2IP Code     Particulars of Expenditure Primary □General □Other     Date Imoniti, day, year)     Amount of each	Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month,	Amount of each expen
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11. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1.	POLITICAL PARTY COMMITTELS OR DESIGNATED AGENT(S)
POPTAL LIPETION COMMISSION	ON BLHALF OF CANDIDATES FUR FEDERAL OFFICE
325 K Street, NW	(2 U.S.C. 4 .1a(d))

(2 U.S.C. 4 . Ja(d))

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(Supporting Line 24, FEC Form 3)

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Line 24. FEC Ferr

and at and

(To be used only by Political Committees in the General Election)

Name of Political Committee in Full National Republican Senatorial Committee

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If YES, name the designating committee			and the second second	
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date imonth, day, year)	Amo
Dorothy Jordan Associates, Route 114 East Sebago, Maine	Bill Cohen U.S. Senate Maine	Housing	9-1-78	\$1,5
	Appregate 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 Imprish, Gay, year)	Amou
The Postmaster United States Senate Washington, D. C. 20510	Thad Cochran U.S. Senate Mississippi	Postage	9-20-78	127.
	Aggregate Central Election Expenditure for this Candidate - \$	STRATE HE AND		
Full Name, Mailing Address and ZIP Code of Each Pavee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Dase imonth, day, yearl	Ar
The Postmaster United States Senate Washington, D. C. 20510	Bill Armstrong U.S. Senate Colorado	Postage	9-21-78	1
a second and a second	Aggregate General Election Expenditure for this Candidate - \$	AP		
Full Name, Mailing Address and 2IP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date imonth, day, yearl	Amou
The Postmaster J.S. Postal System	Don Shasteen U.S. Senate Nebraska	Postage	9-21-78	3,00
	Agreenate General Lieutons Lapenditure for this Condidate - 5			
Full Name, Mailine Address and 21P Code of Each Pavee	Name of Federal Candidate Subported, State, District & Office Sought	Particulars of Expenditure	Date Imonth, day, yearl	Amou
Automated Business Mail 1515 Livingston Road Washington, D. C. 20021	David Durenberger U.S. Senate Minnesota	Typing Services	9-26-78	2,09
1. ALX 1 YO K.	Appreciate General Election Expenditure T for this Candidate - 5	and the second second	1.1.1	
SUBTOTAL of expenditures this page (option				\$ 6.79

HEDULET

1.0.1. 1978 mai Election Commission

. 5 K Street, NW. moton, D.C. 20463

#### ITEM ED COORDINATED EXPENDITURE MADE BY POLITICAL PARTY COMMITTELS OR DESIGNATED AGENT(S) ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE (2 U.S.C. 441a(d)) (Supporting Line 24, FEC Form 3)

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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

Has your Committee been designated to mak If YES, name the designating committee	te coordinated expenditures by a political pa		YES	D NO
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)	Am
United Airlines Dept. 745711 P. O. Box 36022M Pittsburgh, Penns. 15250	Nancy Kassebaum U.S. Senate Kansas	Air Travel	9-26-78	30
	Aggregate General Election Expenditure for this Candidate S			-
Full Name, Mailing Address and ZIP Code of Each Pavee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date (month, day, year)	An
Communications corp. of America #1 Direct Marketing Plaza Boston, VA 22713	David Durenberger U.S. Senate Minnesota	Direct Mail Services	9-27-78	8,9
	Aggregate General Election Expenditure for this Candidate – S			
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)	An
National Direct Mail Service Inc. 2233 Wisc. Ave., N.W. #800	David Durenberger U.S. Senate Minnesota	Direct Mail Services	9-27-78	7,1
Wash, D.C. 20007	Aggregate General Election Expenditure for this Candidate S		The second	
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)	A
	Aggregate General Election Extenditure			
	for this Candidate - S			1
Full Name, Mailing Address and ZIP Code of Each Pavee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date tmonth, day, year)	
¥.	Aggregate General Election Expenditure			

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### POLITICAL PARTY COMMITTLES OR DESIGNATED AGENT(S) ON PART OF CANDIDATES FOR FEDERAL OFFICE

(2 U.C.C. 441a(d))

(Supporting Line 24, FEC Form 3)

Page 1 of S.C.

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IT b tie used only by Political Committees in the General Election!

National Ke	publican Senatorial Commit	ttee-Expenditures	
If YES, name the designating committee:	Republican National an		e Comittee
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of Each Favee	State, District & Office Sought		Car, Year)
Daniels & Associates, Inc. 400 Office Park Drive Birmingham, Alabama 35223	Martin for U.S. Senate Alabama	Media Advertising & Programming	9-1-78
and the second	Appreciate General Election Expenditure for this Candicate - 5 52 2000		
Full Name, Mailing Address and 21P Code of Each Payee	Name of Federal Candidate Supported. State, District & Office Sought	Farticulars of Expenditure	Date Imonth, ( Gay, year)
R. J. Sann & Associates 630 - 9th Avenue New York, New York 10030	Kansans for Kassebaum Kansas	Media Advertising	9-1-78
	Apprepate General Election Expenditure for this Candidate - 5/8 296, 18		
ull Name, Mailing Address and ZIP Code of Each Pavee	Name of Federal Candidate Supported, State, District & Office Souphi	Farticulars of Expenditure	Date Imonth. dev. year1
Monarch Printing Corp. 1130 West Adams Street Chicago, Illinois 60607	Citizens for Percy Illinois	Printing services	9-5-78
	Appreciate General Election Expenditure for this Candidate - 5 416 2.41		
Full Name, Mailing Address and ZIP Code	Name of Feberal Candidate Supported. 1	Particulars of Expenditure	Date Imonth,
of Each Paves	State, District & Office Soupht		GPV . VEBT
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
	Appressie General Executor Expenditure   to: this Candidate - 5 4+ 6.21		
ull Name, Maring Address and 21P Code : of Each Paves	Name of Federal Candidate Subdorsed, State, District & Onlice Sought	Farticulan of Expenditure	Date Imonth, col, vear
Bailey, Deardourff & Associates	Citizens for Percy	Nedia Advertising	5-5-78
Suite #1120 733 - 15th St., N. W. Washington, D. C. 2000	Illincis .		

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POLITICAL FARTY COMMITTEES OR DESIGNATED AGENTIS) ON B MALF OF CANDIDATES FOR FED TAL OFFICE

(2 U.S.C. 441a(d)) (Supporting Line 24, FEC Form 3) 1.m \_ 01 17\_

In Line 24, 155 For 3

ITo be used only by Politica ommonees in the General Election!

Isame of Folicical Committee in Full

Has your Committee been designated to ma				DNO
If YES, name the designating committee:	Republican Nationaland/		Comittees	
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Wendt Advertising P. O. Box 2128 Great Falls, Montana 59403	Williams for Senate . Montana	Media Advertising	9-6-78	\$ 10,0
a harris	Appresate General Election Expenditure for this Candidate - 5 / 5 4 -2			
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Soupht	Particulars of Expenditure	Date (month, Gay, year)	Amoun
Ruth Jones, Ltd. 123 East 75th Street New York, New York 10021	Bell for Senate Comm. New Jersey	Media_Advertising	9-6-78	25,0
N	Apprepare General Election Expenditure for this Candidate - 5 24.750			-
Dull Name, Mailing Address and 21P Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Parsiculars of Expenditure	Date Imonth, Gay, year!	Aniour
Envelopes Unlimited, Inc. 849 N. Horners Lane Rockville, Maryland 20850	Durenberger for Senate Minnesota	Envelopes	9-7-78	. 1
	Apprepate General Election Expenditure for this Candidate - \$68.057.30			
Full Name, Mailing Address and ZIP Code of Each Pavee	Name of Federal Candicate Supported,   State, District & Office Sought	Particulars of Expenditure	Date imonth, cay, yearl	Ameu
Communication Specialists, Inc. P. O. Box 1529 Austin, Texas 78767	Texans for Tower Texas	Printing services	9-11-78	52,1
5 t (S	Apprepase General Election Expenditure			39. S.S.
Full Name, Mailing Address and ZIF Code of Each Pavee	Name of Federal Candidate Subborsed, - State, District & Office Sought	Particulan c'Éxpenditure	Chie imionit.	Ames
J. Bruce Hildebrand 192 Twiggs Corner Peachtree City, Georgia 30269	Bell for Senate Com. New Jersey	Political Consulting	5-8-78	2,
70.5500.008411	Appreciate General Electrich Excendentiele Include Candidate - 5 1011 7521			
UETOTAL of excenditures this sade lobbio				5

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### ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE

(L.U.D.C. 441a(d)) (Europorting Line 24, FEC Form 31

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ITo be used only by Political Committees in the General Election)

Name of Folisical Committee in Full

P. O. Box 1938       Maine       Maine       Consultant       9-12-7         Portland, Maine 04104       Apprepate General Election Expenditure for this Candidate - 5 25 (47, 15)       Consultant       9-12-7         Null Name, Mailing Address and ZIP Code of Each Pavee       Name of Pederal Election Expenditure State, District & Office Soupht       Particulari of Expenditure Cohen for Senator       Particulari of Expenditure Consultant       Date Import         Jane Johnson P. O. Box 1938       Cohen for Senator       Political Consultant       9-12-7         Maine       Cohen for Senator       Political Consultant       9-12-7         Maine       Apprepate General Election Expenditure for this Candidate - 5 25(-47, 15)       Political Consultant       9-12-7         Mull Name, Mailing Address and ZIP Code of Each Pavee       Name of Pederal Election Expenditure for this Candidate - 5 25(-47, 15)       Particularis of Expenditure tor this Candidate - 5 25(-47, 15)	\$ 25,0 . Amour 2 . Amour
7801 Metro Parkway Minneapolis, Minnesota 55420       Minnesota         Aggregate General Election Extenditure for this Candicate - 5 4/0 7-2/0       Particulari of Extenditure for this Candicate - 5 4/0 7-2/0         Full hame, Mailing Address and 21P Code of Exch Paves       Name of Fooral Candicate Supported. State, Diffici & Office Souphi       Particulari of Extenditure for this Candicate - 5 25/04/0.15         David R. Ault       Cohen for Senator Maine       Political       Difficial         P. O. Box 1938       Maine       Consultant       9-12-7         Null Name, Mailing Address and 21P Code of Exch Paves       Name of Fooral Candicate - 5 25/04/0.15       Particulari of Extenditure for this Candicate - 5 25/04/0.15       Difficial         Jane Johnson P. O. Box 1938       Cohen for Senator Maine       Political Consultant       Consultant       5-12-7         Apprepare General Election Extenditure for this Candicate - 5 25/04/0.15       Particulari of Extenditure Consultant       Canter Supported Consultant       Diff fooral Consultant       Diff fooral Consultant         Mult Name, Maine Address and 21P Code of Each Paves       Cohen for Senator Name of Fooral Condicate Supported. State, Difficial Consultant       Particulari of Extenditure Consultant       S-12-7         Mult Name, Maine Address and 21P Code of Each Paves       Name of Fooral Condicate Supported. State, Difficial Consultant       Particulari of Extenditure Consultant       Date Imon Car. year         Thomas	2 . Amour 2 . Amour
Full Name, Mailing Adoress and 21P Coor of Each Faver       Name of Froeral Candicate Supported. State, District & Office Soupht       Particulars of Expenditure over, ver       Cate Imon over, ver         David R. Ault       Cohen for Senator       Political       9-12-7         Portland, Maine 04104       Maine       Consultant       9-12-7         Null Name, Mailing Adoress and 21P Coor of Each Paver       Name of Froeral Candicate Supported. State, District & Office Soupht       Particulars of Expenditure for this Candicate - 5.25 (47.15")       Particulars of Expenditure for this Candicate Supported.       Particulars of Expenditure for this Candicate - 5.25 (-47.15")         Date Johnson P. O. Box 1938       Cohen for Senator Maine       Folitical Consultant       S-12-7         Apprepare General Election Expenditure for this Candicate - 5.25 (-47.15")       Particulars of Expenditure corv. vear       Date Import carv. vear         Maine Date Pavee       Name of Froeral Candicate Supported.       Particulars of Expenditure for this Candicate - 5.25 (-47.15")       Particulars of Expenditure carv. vear         Thomas A. Daffron P. O. Box 1938       Name of Froeral Candicator Name	2 
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### ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE

(2 U.S.C. 441a(d))

(Supporting Line 24, FEC i orm 3)

(To be used only by Poincel Committees in the General Liemion)

Name of Folicical Committee in Full

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has your Committee been designated to man	Republican National and/	Carty committee'	1:	ONC
If YES, name the designating committee . Full Name, Mailing Address and ZIP Coot of Each Payee	Republican National and/ Name of Program Canoidate Supported, State, District & Office Sought	Farticulars of Expenditure	Date imports.	Amount
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Portland, Maine C4104	Maine	Consultant	9-12-76	1,30
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Washington, D. C. 20007	Aggrepate General Election Excenditure to: this Candidate - 5 41621.41	(		
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## ON REPAILS OF CANDIDATES FOR FEDERAL OFFICE

(EUL.C. 441a(d))

(Supporting L 10 24, FEC Form 3)

(To be used only by Political - mmmers in the General Disction)

For Line 24, FIC Form 3

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Name of Folitical Committee in Full

et Lach Forer         Sum, Daniel & Other Sourch         Minder Of Legislation         One of Legislation         O	If YES, name the designatine committee: Full Name, Mailing Appress and ZIP Cope	Republican National and/o	Faniculars of Expenditure		
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	Plaza Associates Account Suite #110 5660 S. Syracuse Circle	Committee		9-13-78	3,
50110 tering Candidate - 5 34.001			Star And		19

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### ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE

(CU.S.C 411+(4))

(Su: parting Line 24, FEC Forn, 3)

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(To be used only by Folicies' Committees in the General Election)

Name of Folinical Committee in Full

National Republican Senatorial Committee-Expenditures has your Committee been designated to make coordinated expenditures by a political party committee? EYES DND If YES, name the perionatine committee: Republican National and/or Respective State Committees Full Name, Mailing Address and ZIP Code Name of Federal Candidate Supported, Farticulars of Expenditure Gate imonth. Amount of Each Paver State, District & Office South CAY, YEAR) Production service Taurus Productions Armstrong Campaign 2502 E. Pikes Peak Ave. Committee for television 9-13-78 2,86 Colorado Springs, Colo. Colorado 80909 Appregate General Election Extenditure for this Candicate - 5 5460 ... Name of Federal Candidate Supported, Full Name, Mailing Address and ZIP Coor Usir imposto. Particulars of Expenditure Amount of Each Fayer State, District & Office South Cay, year) 1 Decision Making Armstrong Campaign Polling 9-13-78 18,00 Information Committee Suite #800 Colorado 2700 N. Main Street L'Banta Ana, California 9270 Appresate General Election Expenditure tor this Candicate - 5 3400 Date imonth, Name of Federal Candidate Supported. Full Name, Mailing Address and ZIP Code Particulars of Escenditure Amount State, District & Office Southt Cay, yearl of Each Faver 10 16.94 Advertising 9-13-78 "Ideas for Advertising, Inc. Armstrong Campaign Suite #290 Committee Production Colorado 1715 Monterey Road "Colorado Springs, Colo. 80910 C Apprepate General Election Expenditure for this Candicate - 5 54000 Name of Federal Candidate Supported. Farticulars c' Expenditure Date Imonth. Amour Full Name, Mailing Address and ZIP Code State, District & Office Southt of Each Paver CAN. VEAT ] 9-13-78 90 Printing services Armstrong Campaign Cottrell Printing 6701 South Emporia Committee Colorado Englewood, Colo. 80112 Apprecase General Election Expenditure ter this Candidate - 1 3400 Name of Febria Gandidate Supportes Farticulars of Excenditure Sale Import Full Name, Mailing Appress and Zif Cope Amour State, District & Office South: con veri of Each Paver Madia Consultant 9-13-78 3.00 Armstrong Campaign Roger Ailes & Associates 230 Central Park South Committee Colorado New York, New York 10019 Appreparte General Electrich Extenditure tor this Cana parts - 5 54 C.P.P. 1 SUSTOTAL OF EXCENSIONER IT IS SACE IDDITIONAL ٤ TOTAL this Levics Hast Sam this une number only

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## ON BELIALT OF CANDIDATES FOR FEDERAL OFFICE

(2 U.S.C. 441a(d))

(Supporting Line 24, FEC Form 3)

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For Line 24, FEC Form 3

(To be used only by Folince) .mmmmes in the General Election!

Name of Folitical Committee in Full

If YES, name the designation committee: Full Name, Mailing Address and ZIP Code	Republican National and/or Name of Feberal Candidate Supported.	Farticulars of Excenditure	Date Importo,	Amoun
of Each Payee	State, District & Office Soupht		der, vear)	1
Dialcom, Inc. 1104 Spring Street Silver Spring, Maryland 20910	Armstrong Campaign Committee Colorado	Computer services	9-13-78	\$ 1,3
	Apprepare General Election Expenditure for this Candidate - \$ 5.4000			
ull Name, Mailing Adoress and ZIP Code of Each Payee	Name of Federal Candicate Supported, State, District & Office Soupht	Farticulars of Expenditure	Date Imonth, Gay, year)	Amou
Binns & Associates c/o Byron Nelson 2013 Cedar Springs Road Dallas, Texas 75201	Armstrong Campaign Committee Colorado	Printing services	9-13-78	6,0
	Apprepate General Election Expenditure for this Candicate - 5 SHC 21.	•		-
ull Name, Mailing Address and 21P Code of Each Pavee	Name of Process Candidate Supported, State, District & Office Soupht	Particulari of Expenditure	Date Imonth, cay, yearl	400
National Direct Mail Services, Inc. Suite #400 2233 Wisconsin Ave.,N.W. Machington D. C. 20007	Armstrong Campaign Committee • Colorado	Direct Mail service	9-13-78	7,
Washington, D.C. 20007	Aggregate General Election Expenditure tor this Candidate - 5 5400000	· · · ·		145
ull Name, Mailing Adoress and ZIP Code of Each Paver	Name of Pederal Candidate Subborted, State, District & Office South:	Particulars of Expenditure	Date Imonth, dev, year!	Amo
Armstrong Campaign Committee 5680 S. Syracuse Circle Plaza South Building Englewood, Colo. 80264	Bill Armstrong U. S. Sènate Colorado	Sec. 441 Contribution	9-13-78	15
SUETEROOD, COTO, COTO,	Appresese General Election Expenditure	1.8 20 28-0	ers 5.0	111-3
di Name, Mailing Address and ZIF Coor of Each Faver	Name of Federal Candidate Suddoned,   State District & Driver South:	Particulari of Excenditure	Date imposite. Gas vear!	Amo
Humphrey for Senate F. C. Box 28 Concord, New Hampshire 03301	Gordon Humphrey U. S. Senate New Hampshire	Sec. 411 Contribution	9-13-78	10
1	Represent General Execution Excenditioners represent Conception - 5 (15) (10)			
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### ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE

(2 U.S.C 441a(d))

(Supporting Line 24, FEC Form 3)

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Isame of Folitical Committee in Full

Full Name, Mailing Adoress and ZIP Code of Each Paree       Name of Federal Candidate Succ State, District & Office Soup         Saxter for Senate Suite #62       Jim Baxter U. S. Senate Delaware         Juin Baxter 19803       Jim Baxter U. S. Senate         Wilmington, Delaware 19803       Jim Baxter U. S. Senate         Full Name, Mailing Adoress and ZIP Code of Each Pavet       Name of Federal Candidate - S // 5 // 5 Name of Federal Candidate Support for this Candidate - S // 5 // 5 State District & Office Soup         R. J. Sann & Associates 630 9th Avenue New York, New York 10036       Kansans for Kasseb Kansas         Full Name, Mailing Adoress and ZIP Code of Each Favet       Name of Federal Candidate Support State, District & Office Soup         Wendt Advertising P. O. Box 2128 Great Falls, Montana 59403       Williams for Senate Name of Federal Election Exper tor this Candidate - S / C. 45         Full Name, Mailing Address and ZIP Code of Each Faver       Name of Federal Election Exper tor this Candidate - S / C. 45         Wendt Advertising P. O. Box 2128 Great Falls, Montana 59403       Williams for Senate Name of Federal Election Exper tor this Candidate - S / C. 45         Full Name, Mailing Address and ZIP Code of Each Faver       Name of Federal Election Exper tor this Candidate - S / C. 45         Shith and Harroff, Inc. 922 Pennsylvania Ave., SE Washington, D. C. 20003       Cohen for Senator Maine	Sec. 441 Contribution 9-13-78 Ture Particulari of Expenditure Car, vearl m Media Advertising 9-18-78	\$ 5
Suite #62 Independence Mall Wilmington, Delsware 19803 Full Name, Mailing Acoress and 2IP Coor of Each Pavee R, J. Senn & Associates 630 9th Avenue New York, New York 10036 Full Name, Mailing Acoress and 2IP Coor of Each Pavee Wendt Advertising P. O. Box 2128 Great Falls, Montana 59403 Smith and Harroff, Inc. 922 Pennsylvania Ave., SE Washington, D. C. 20003 V. S. Senate Delaware U. S. Senate Delaware V. S. Senate Delaware New are Apprepate General Election Exper- tor this Canoicate - 5 / S 2-46 Name of Federal Candidate Support State, District & Office Soup State, District & Office Soup State State, District & Office Soup State State, District & Office Soup State State, District & Office Soup State State District & Office Soup State State District & Office Soup State St	Contribution 9-13-78	.   Am
Aggregate General Election Expert for this Candidate - S     U T ()       Full Name, Mailing Address and ZIP Code of Each Pavee     Name of Federal Candidate Support State, District & Office Soup       R. J. Senn & Associates     Name of Federal Candidate Support       630     9th Avenue     Name of Federal Election Expert       New York, New York     10036     Name of Federal Election Expert       Full Name, Mailing Address and ZIP Code of Each Faver     Name of Federal Election Expert       Wendt Advertising P. O. Box 2128     Name of Federal Candidate Support       Great Falls, Montana 59403     Williams for Senation Aggregate General Election Expert       Will Name, Mailing Address and ZIP Code of Each Faver     Name of Federal Election Expert       State, District & Office Soup     Name of Federal Election Expert       State, District & Office Soup     Name of Federal Candidate - S       Wendt Advertising P. O. Box 2128     Williams for Senation South and Earroff, Inc.       Spith and Earroff, Inc.     Cohen for Senator       S22 Pennsylvania Ave., SE Washington, D. C. 20003     Cohen for Senator	INC. Particulari of Expenditure Date Impostr. dev. vearl Im Media Advertising 9-18-78	1
of Each Pavee     State. District & Office Soup       R. J. Sann & Associates     Kansans for Kasseb.       630 9th Avenue     Kansas       New York, New York 10036     Apprepate General Election Experitor this Candidate - 5 / S 246.       uil Name, Mailing Acoress and 21P Coor     Name of Federal Candidate Support       uil Name, Mailing Acoress and 21P Coor     Name of Federal Candidate Support       Wendt Advertising     Williams for Senation       P. O. Box 2128     Williams for Senation       Great Falls, Montana     59403       Apprepate General Election Experitor this Candidate - 5 / L. 45       Uil Name, Mailing Acoress and 21P Coor     Name of Federal Candidate Support       State, District & Office Souph       Wendt Advertising     Williams for Senation       F. O. Box 2128     Nontana       Great Falls, Montana     59403       Apprepate General Election Experitor Inits Candidate - 5 / L. 45       Nume of Federal Candidate - 5 / L. 45       Vill Name, Mailing Acoress and ZIP Coor       of Each Faver       Smith and Harroff, Inc.       922 Pennsylvania Ave., SE       Washington, D. C. 20003	m Media Advertising 9-18-78	1
630       9th Avenue       Kansas         New York, New York       10036       Apprepate General Election Experitor Init Candicate - 5 /8 2-96         uil Name, Mailing Accress and 2IP Coor of Each Faver       Name of Federal Candicate Support State, District & Office Source         Wendt Advertising       Williams for Senation         P. O. Box 2128       Williams for Senation         Great Falls, Montana       59403         Apprepate General Election Experitor Init Candidate - 5 / 6 .4 %         uil Name, Mailing Accress and ZIP Coor of Each Faver         Spith and Harroff, Inc.         922 Pennsylvania Ave., SE         Washington, D. C. 20003	9-18-78	1
Itor this Candicate - 5 /8 246         UIT Name, Mailing Accoress and 21P Coor of Each Faver         Wendt Advertising P. O. Box 2128 Great Falls, Montana 59403       Williams for Senate Montana 59403         Aggregate General Election Expen- tor this Candidate - 5 /6.45         Wit Name, Mailing Accoress and ZIP Coor of Each Faver       Name of Federal Election Expen- tor this Candidate - 5 /6.45         Wit Name, Mailing Accoress and ZIP Coor of Each Faver       Name of Federal Candidate - 5 /6.45         Smith and Harroff, Inc. 922 Pennsylvania Ave., SE Washington, D.C. 20003       Cohen for Senator Maine		
Williams, Maxing Acoress and ZIP Coor       Name of Federal Candidate Supply         Wendt Advertising       Williams for Senate         P. 0. Box 2128       Williams for Senate         Great Falls, Montana       59403         Aggregate General Election Expense       Aggregate General Election Expense         Will Name, Mailing Acoress and ZIP Coor       Name of Federal Candidate - 5 / C, 4 %         Will Name, Mailing Acoress and ZIP Coor       Name of Federal Candidate - 5 / C, 4 %         Snith and Harroff, Inc.       State, District & Office South         S22 Pennsylvania Ave., SE       Cohen for Senato:         Washington, D.C. 20003       Maine		-
P. O. Box 2128 Great Falls, Montana 59403 Aggregate General Election Expen- tor this Candidate - 5 / C. 4 % Name of Federal Condicate Supp- of Each Faver Smith and Harroff, Inc. 922 Pennsylvania Ave., SE Washington, D.C. 20003 Montana Aggregate General Election Expen- tor this Candidate - 5 / C. 4 % Name of Federal Condicate Supp- State, District & Office South Cohen for Senator Maine		. Am
Aggregate General Election Expen- tor this Candidate - 5 / 6.45 of Each Paver Smith and Harroff, Inc. 922 Pennsylvania Ave., SE Washington, D.C. 20003	Media Advertising 9-18-78	
Smith and Harroff, Inc. 922 Pennsylvania Ave., SE Washington, D.C. 20003		1
922 Pennsylvania Ave.,SE Maine Washington, D.C. 20003	Ted. Particulari of Expenditure Date (month, Date (month) Date (month)	A
	Film Production 9-19-78	
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uli Name, Mailing Appress and 21F Coper   Name of Feberal Canpiders 5-20 of Each Faver	nez, Parsiculari z' Excenditure Disterministi Casi veet.	! ~
Northwest Teleproductions Inc. 4435 West 77th St. Minneapolis, Minnesota	te Nečis Advertising 5-19-71	
55435 - Appresate General Electricit (1994) Trontine Canologie - 5 (1994)	3.	
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### ON BEHALT OF CANDIDATES FOR FEDERAL OFFICE

(: U.S.C. 441a(d))

(Lupporting Line 24, FEC Form 3)

(To be used only by Folicital fimmittees in the Ganaral Liecture)

Name of Political Committee in Full

Full Name, Mailing Adoress and ZIP Coor	Republican National and/o	Farriculars of Expenditure	Dist imposts	Amou
of Each Payer	State, District & Office Soupht		Cay, year)	
Daniels & Associates 402 Office Park Drive Suite #110 Birmingham, Alabama	Martin for U.S.Senate Alabama	Media Advertising	9-19-78	\$ 25,
35223	Apprepare General Election Expenditure for this Candidate - 5 '5 C' 2011			
Full Name, Mailing Address and ZIF Code of Each Payee	Name of Federal Candidate Supported,   State, District & Office Soupht	Particulars of Expenditure	Date imonsh, cev, year)	-
Northwest Bell Telephone				
Company 1432 Soo line Building Minneapolis, Minnesota 55402	Durenberger for Senate Minnesota	Telephone service	9-19-78	3,
	Apprepare General Election Expenditure for this Candicate - 5 (5,027, 30			-
ull Name, Mailing Addiess and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Soupht	Particulars of Expenditure	Date (month, Gay, year)	-
Shasteen for Senate 820 South 13th Street Lincoln, Nebraska 68508	Don Shasteen U.S. Senate Nebraska	Sec. 441 Contribution	9-20-78	6
	Apprepare General Election Expenditure to: this Candidate - 5 55 40.13			
ull Name, Mailing Address and ZIF Coor of Each Pavee	Name of Feberal Candidate Supported. State, District & Office Soupht	Farticulars of Expenditure	Date Imonst. car, vearl	Amo
Paul F. Overgaard Greenbriar Apartments 10401 S. Cedar Lake Rd. Minnetonka, Minnesota 55343	Durenberger for Senate Minnesota	Folitical Consulting	9-20-78	1
2-13-10-13-13-13-13-13-13-13-13-13-13-13-13-13-	Apprepare General Election Expenditure "			
ull Iverne, Maning Appress and 21F Coor	Stete District & Orlice Supprises	Parsiculars of Excernoliture	Low month, Car, vert	
Themas F. Horner Apt. #307 6300 York Ave., South Edina, Minnesota 55435	Durenberger for Senate Minnesota	Felicies! Consulting	9-20-78	
	He man General Electrics Electronic former une			-
USTOTAL C' EXDENDITURE INI SECTIONI				1

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### ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE

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Full Name, Mailing Address and ZIP Coor	Republican National and	for Respective State	E Committees	S Amou
of Each Payee	State, District & Office Soupht		Cur, year)	
Southtown Office Park 8120 Penn Avenue, South Bloomington, Minnesota 55431	Durenberger for Senate Minnesota	Rental - office Space	9-20-78	\$ 1,
	Apprepare General Election Expenditure to: this Candidate - 5 69 657, 30	1997 (A. 1997)		
Full Name, Mailing Address and ZIF Code of Each Paver	Name of Federal Canoidate Subported. State, District & Office Sought	Parsiculars of Expenditure	Date (month, Gay, year)	400
DRoger Ailes & Associates, Inc. 230 Central Park South New York, New York 10019	Durenberger for Senate Minnesota	Media Consulting	9-20-78	9,
	Apprepate General Election, Expenditure for this Candidate - S C 5, 057, 30			-
Full Neme, Mailing Address and ZIF Code of Each Pavee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date imonth, Gry, year!	Amo
Charles R. Geer, Jr. 6004 N. 19th Street Arlington, Virginia 2220	Durenberger for Senate Minnesota	Fnotographic Services	9-20-78	
*	Apprepare General Election Expenditure for this Candidate - 5 65,057. 30			
Euli Name, Mailing Address and 21P Coor of Each Paver	Name of Federal Candidate Supported, State, District & Office Sought	Farticulars of Expenditure	Date imonth, day, year)	Amo
Lee Califf 1802 Eackamore Lane Alexandria, Virginia 22305	Warner for U.S. Senate Virginia	Political Consultant	9-20-78	
	Appresate General Election Expenditure : tor this Generate - 5 - 7 7 55 5	main and		
	Name d' Feberal Candidate Supported,	Familian of Expenditure	Crit Imposit.	Am
Williem Holt Kling 1013 26 Street, South Arlington, Virginia 22202	Warner for U.S. Senate Virginia	Folitical Consultati	5-20-78	:
	Appreprie General Election Expensioner			
	ter thill we bibette - 2 1 020			

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## POLITICAL CARTY COMMITTEES OR DESIGNATED AGENTIS

(2 U.S.C. 441a(d))

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For Line Se, FEC Form 2

(Supporting Line 24, FEC Form 3)

To be used only by folisical Lommittees in the General Election

Name of Political Committee in Full

Has your Committee been besignated to ma If YES, name the designating committee:	Republican National and/o			0.00
Full Name, Mailing Address and ZIP Cooe	Name of Federal Candidate Supported,	Farticulars of Expenditure	Date imports	I Amou
of Each Payer	State, District & Office Soupht		Car. year)	
John F. Buckley 2662 Glengyle Drive Vienna, Virginia 22180	Warner for U.S. Senate Virginia	Political	9-20-78	\$ 9
SA Stranger	Apprepare General Election Expenditure for this Candidate - \$ 31.355			
full Name, Mailing Address and 21P Code of Each Payee	Name of Federal Candidate Subported, State, District & Office Soupht	Parsizulars of Expenditure	Date Imonth, Gay, year)	- Amo
UPI, Inc. Attn: Richard Ross 20 Ashburton Place Boston, Massachusetts 02108	Cohen for Senator Maine	Wire Se <del>r</del> vice	5-20-78	7
ull Name, Mailing Address and ZIP Code	Apprepate General Election Expenditure tor this Candidate - 5 25, 647, 15 Name of Federal Candidate Supported.	Farticulars of Expenditure	Date smonth,	- Amo
of Each Pavee	State, District & Office Sought		Cav. year)	
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,
1	Apprepate General Election Expenditure for this Candidate - \$ 37, 555			
ull Name, Mailing Address and 21P Coor of Each Payee	Name of Federal Canoicate Supported, 1 State, District & Office Soupht	Farticulars of Expenditure	Cate importh, Cav, vear1	400
Decision Making Information Suite#800 2700 N. Main Street Santa Ana, CA 92701	Pressler for Senate South Dakota	Folling	9-21-78	4
Seller Aller on Seller	Appreciate General Election Extenditure		i	
ull Name, Mailing Aboress and 21F Code of Each Faver	Name of Federal Canologie Subborses	Farsourt of Exitnetion	Lan. veril	1
Illincis Bell Telephone Attn. Mr. Deitch 225 West Randolph St. HQ-193	Citizens for Ferry Illinois	Telephone Service	5-22-78	:
Chicago, Illinois 60606	Hereichte General Electron Expensioner Inner Canologie - 5 91 C. F. M.			×

### UN ELMALT OF CARDIDATES FOR FLDERAL OFFICE

(: U:: ... 4# 1a(d)) (Supporting Line 24, FEC Form 3

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Isame of Fouriest Commuter in Full

National Republican Senatorial Conmittee-Expenditures Has your Committee been designated to make coordinated expenditures by a political party committee? D YES DND If YES, name the designation committee: Republican National and/or Respective State Committees Full Name, Mailing Address and ZIP Cooe Name of Federal Candicate Supported. Farticular of Expenditure Dair Importo. Amoun State, District & Office Sought of Each Paver Car, year) Midwest Film Company 804 S. Phillips Ave. Pressler for Senate Film Production 9-22-78 S 50 Sioux Falls, South Dakota South Dakota 57104 Aggregate General Election Expenditure tor this Candidate - 5 75 CT. Name of Februal Candidate Supported. Full Name, Mailing Address and ZIP Cope Farticulars of Expenditure Date imphit. Amour of Each Paver State District & Office South: Cay, vear) Communications Corporation of America People for Boschwitz Direct Mail 9-22-78 16 #1 Direct Marketing Plaza Minnesota Services Boston, VA 22713 Agoregate General Election Expenditure for this Candidate - 5 40 720 Null Name, Mailing Adoress and ZIP Cope Name of Federal Candicate Supported. Farticulan of Expenditure Date importa. Amoun of Each Faver State, District & Otlice Sought Cay, year) 5 Wiland & Associates Committee for Direct Mail 9-27-78 10.0 219 East Davis St. Senator Griffin Services Culpeper, VA 22701 Michigan Apprepare General Election Expenditure for this Candidate - 5 / 52.050,93 Æ Cull Name, Mailing Address and ZIP Coor Neme of Peperal Canoicate Supported Farticulars of Expenditure Dale importo Amour State, District & Office Southt of Each Paver Cay, year) Diversified Mail Committee for 11 9-27-78 Senator Griffin Direct Mail Marketing 5,0 Services Michigan 809 Cameron Street Alexandria, VA 22314 Appresate General Election Expenditure ter that Candidate - 5/5 2 6/12. 9 Particulars of Extenditure Litte Imposto Full Name Marine Appress and 21F Cope Amour State District & Other South: Ces veri e' East Fever Minnesota Datasystems, Inc. Durenberger for Senate ! 750 North Arm Srive Computer services 5-27-78 60 Mount, Minnescie 55364 Minnescia Apprepara General Electrich, Expenditure ter the Canadant - 5 a 5 DUISTOTAL of external tures this paper (cotional . 5

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## Hermon Commission

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POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S)

(2 U.S.C. 441a(d))

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(Supporting Li + 14, FEC Form 3)

for Line 24, Fiction 3

(To be used only by Political Commons in the General Election)

frame of Folisical Committee in Full

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has your Committee been designated to mak If YES, name the periodating committee	Republican National and/	or Respective State	Comittees	ONC
Full Name, Mailing Address and ZIP Code of Each Payer	Name of Federal Candidate Supported, State, District & Office Sought	Farticular of Excenditure	Cate Imonth, day, year)	Amount
Barre/Lawrence Associates Inc. P. O. Box 485 Alexandria, VA 22313	Warner for U.S. Senate Virginia	Political Consult- ing & Management Services	9-22-78	\$ 50
	Appressie General Election Excenditure tor this Candidate - 5 37 8 38	Construction of the second	Section	
Full Name, Mailing Address and ZIP Code of Each Paver	Name of Feorial Canoidate Supported, State, District & Office Soupht	Particulari of Expenditure	Date Imposts, Gay, year)	Amoun
Automated Business Mail 5515 Livingston Rd., S.E. Rashington, D.C. 20021	Kansans for Kassebaum Kansas	Typing services	9-25-78	. 55
יי יי	Appresate General Election Expenditure for this Candidate - S 15.242.18			-
All Name, Mailing Adoress and ZIP Code of Each Pavee	Name of Federal Candidate Supported,   State, District & Office Sought	Particulari of Expenditure	Date imonin, cer, vearl	Amoun
American Mailing List 7777 Leesburg Pike Falls Church, Virginia 22043	Citizens for Cochran Mississippi	Direct Mail Services	9-25-78	1,8
с с	Apprepate General Election Expenditure for this Candidate - S /1 477,	ii.		
Full Name, Mailing Address and 21P Code	Name of Federal Candidate Supported, State, District & Office Souph:	Particulars of Expenditure	Date imposts.	Amour
Smith and Harroff, Inc. 922 Pennsylvania Ave., SE Washington, D.C. 20003	Cohen for Senator Maine	Film production	9-25-78	7,5
	Appreciate General Election Extenditure -		1	1
UII Name, Mailing Address and ZIF Code    of Each Paver	Neme of Febria: Cano-Gate Supprise, State, District & Office Southt	Farmenian er Excenditure	Dare imphiri Carl Veari	Amsur
Staley & Fox, Inc. 550 Third Avenue New York, New York 10022	Committee for Senator Griffin Michigan	Nadia Advertising	9-17-78	42.0
	Appreciate General Liebber Extended un ten min Generales - 5 757 1070 10			3
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### ON FEILALF OF CANDIDATES FOR FEDERAL OFFICE.

C. U.L.C. 441a(d)) (Supportion: Line 24, FEC Form 2)

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I.ami	101	FOILLERI	Committee	-	Full	

has your Committee been designated to ma				OND
If YES, name the pesionatine committee:	Faruhlinar National and			
Full Name, Mailing Adoress and ZIP Code of Each Payee	Name of Federal Candidate Supported, Stete, District & Office Sought	Particulars of Expenditure	Dair imonih, Gay, year)	Amouns
Institutional Sales, Inc. 2295 University Ave. St. Paul, Minnesota 55114	Durenberger for Senate Minnesota	Office furnishings	9-27-78	\$ 336
	Appreciate General Election Expenditure for this Candidate - 5 ( 5 3 )			
Full Name, Mailins Address and 21P Code of Each Payee	Name of Federal Canoidate Supported, State, District & Office Sought	Farticulars of Expenditure	Care Imports, Care year)	Ampunt
Meyers & Associates, Inc. 12101 - 12th Ave., South Burnsville, Minnesota 5533	Durenberger for Senate Minnesota 7	Printing services	9-27-78	1,64:
n)	Aggregate General Election Expenditure for this Candicate - 5 65057.30			-
Full Name, Mailing Adoress and ZIP Code of Each Pavee	Name of Federal Canoicate Supported, State, District & Office Sought	Particulars of Excenditure	Date Imonth, Gay, yearl	Ampunt
Roger Ailes & Associates 230 Central Park South New York, New York 10019	Durenberger for Senate Minnesota	Media Consulting	9-27-78	11,000
<b>۲</b>	Appresate General Election Expenditure for this Candidate - 5 45057.30			
of Each Paver	Name of Federal Candidate Supported, State, District & Office Sought	Farticulars of Expenditure	Date Imonth, Gas, year)	Amouni
Wendt Advertising P. O. Box 2128 Great Falls, Montana 59403	Williams.for Senate Montana	Media Advertising	9-27-78	25,000
	Appreciate General Exection Expenditure			± 5 9 9
Foli Name, Mailing modress and 21F Cook of East Faves	Name of Appera Cand Cale Scoopries, State District & Office Scoopri	Particulan of Excenditure	Date smonth, Sati vearth	Amoun;
Envelopes Unlimited, Inc. 549 N. Horners Lane Rochville, MD 20850	Citizens for Cochran Mississippi	Envelope Stock	9-17-78	549
	Appreciate General Executor Excenditure	n e		
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### OLIVICALIANTI COMMITTELO UN DESIGNATEDAGENINI 1. - ---- el al-ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE

(2 U.S.C. 441a(d))

(Supporting Line 24, FEC Form 5)

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1. Love 24, 112 Form 3

Name of Folisical Committee in Full

Has your Committee been periphated to ma	al Republican Senatorial Con ake oporoinated expenditures by a political p	Darty committee?	TES	DNO
If YES, name the designating committee:	Republican National and	d/or respective S	tate Con	Eittee
Full Name, Mailing Address and ZIP Coor of Each Payre	Name of Federal Candidate Supported, State, District & Office Soupht	Particulars of Expenditure	Date imports, day, year)	Amou
Envelopes Unlimited, Inc. 649 N. Horners Lane Rockville, MD 20850	Kansans for Kassebaum Kansas	Envelope Stock	9-27-78	\$ 4
Service and the service of the servi	Appresate General Election Expenditure for this Condicate - 5 5 296 18			
Full Name, Mailing Address and ZIF Code of Each Pavee	Ivame of Federal Candidete Supported,   State, District & Office Souph:	Farticulars of Expenditure	Deir Imonsh, dev. year)	- Amou
	1			1
DL Printing, Inc. P.O. Box 8090 Southwest Station Washington, D.C. 20024	Armstrong Campaign Committee Colorado	Printing services	9-27-78	5
4	Apprepare General Election Expenditure for this Condicate - 5 5400		1	-
ull Name, Mailing Address and ZIP Code of Each Pevee	Name of Federal Candidate Supported,   State, District & Office Sought	Parsiculars of Excenditure	Date (month, day, year)	Amou
RMH Research, Inc. 589 Franklin Turnpike Ridgewood, New Jersey 07450	Bell for Senate Committee • New Jersey	Voter Study	9-27-78	1,
	Apprepare General Election Expenditure for this Candicate - 5 29750			
uli Name, Mailing Address and 21P Coor of Each Paver	Name of Federal Candicate Supported. State, District & Office Sought	Particulars of Expenditure	Date (month, Gav, year)	Amo
The Robert Goodman Agency 12 West Read Street Baltimore, MD 21201	Committée for Senator Griffin Michigan	Media Contultant	9-27-78	18,
	Appreciate General Exection Expenditure			!
ult Name, Mailing Address and 21f Code of East Faver	Name of Febria Canologie Scobories, State, District & Office Sovens	Paraiouran of Excenditure	Dirit imphil. Cent Verti	: 400
Roger Ailes & Associates 230 Central Park South New York, N.Y. 10019	Durenberger for Senate Minnesota	Media Consultant	÷-27-75	ć
	Appreciate Demonal Electrics Experipensite recent - Carlo prior - 5 (-5, C.T 3, S.C.			
UETOTAL C' Extenditurer this Secri (Conor				5
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### IULITICAL FRATT CUMMITTEES UN DESIGNATED AGENTICS | 10 -1 -1 ON BEIM F OF CANDIDATES FOR FEDERAL OFFICE (2 U.S.C. 441a(d))

(Supporting Line 24, FEC Form 3)

(To be used only by Folitical \_ ommittees in the General Election)

for Line 14, FLC Form 3

Name of Folisical Committee in Full

Has your Committee been designated to ma If YES, name the designating committee:	Republican National an	d/or respective S	State Con	Eittee
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candicate Supported, State, District & Office Sought	Particulars of Expenditure	Cate imports, Gay, year)	-
Robert R. Dahlgren 3312 N Street, N. W. Washington, D.C. 20007	Brooke Committee Massachusetts	Political Consultant	9-28-78	\$ 1,45
	Appresate General Election Expenditure for this Candidate - 5 2.1 6 5.2 12		1	
Full Name, Mailing Address and ZIP Gode of Each Payee	Name of Federal Candicate Supported, State, District & Office Soupht	Particulars of Expenditure	Care Imonth, Car, vear)	Amoun
Weadon Printing Services 723 N. St. Asaph St. Alexandria, Virginia	Warner for Senate Committee Virginia	Printing Services	9-28-78	2,99
22314	Aggregate General Election Expenditure for this Candidate - 5, 37, 55			-
Full Name, Mailing Appress and ZIP Cope of Each Pavee	Name of Federal Candicate Supported. State, District & Office Soupht	Farticulars of Expenditure	Dete imoniti, Gay, vear?	Amour
Southern Bell Telephone P. O. Box 686 Columbia, S. C.	Re-Elect Thurmond Committee South Carolina	Telephone Services	9-28-78	5,43
P 29215	Aggregate General Election Expenditure for this Candicate - 5 21,246, 34			
Full Name, Mailing Address and ZIP Code of Each Pavee	Name of Federal Candicate Subborsec. State, District & Office Soupht	Farticulars of Expenditure	Date Importh, Gev. year)	Amou
The Keenan Company Keenan Building 1310 Lady Street Columbia, S. C. 29211	Re-Elect Thurmond Committee South Carolina	Rental - Office Space	9-28-78	4
	Appressie General Election Expenditure to: this Cancidate - 5 2 1 244	5 x 3		
Full Name, Mailing Aboress and 21F Code of Each Paver	Name of Federal Candidate Subbories, State, District & Office Souths	Fartiquian of Excenditure	Date smionth, car, wears	Amp
Vailmax Suite 122, Interstate Center Office Bldg. 16 Berry Hill Road Columbia, S. C.	Re-Elect Thurmond Committee South Carolina	Mailing Service	9-28-78	5 / fiez 
29210	Appressie General Entrien Expensioner torinne Generales 5 1246. 20	C. C. Land	1 2 AUX 1	
UETOTAL of expensioner this paper lobito		5-/000Last		5

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### Ph. D.C. 20403

ON EF ULT OF CANDIDATES FOR FEDERAL OFFICE

(Supporting Line 24, FEC Form 3)

ITo be used only by Political unimittees in the General Election

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ter Line 22, Ficture 3

Name of Folicical Committee in Full

Has your Committee been designated to ma If YES, name the designating committee:	Republican National a	nc/or respective	State Cot	Dittee
Full Name, Mailing Appress and ZIF Cone of Each Payree	Name of Federal Candidate Supported, State, District & Office Soupht	Particulari of Expenditure	Date imonth, Gay, year)	Amoun
Arthur J. Finkelstein & Associates 13 Third Street Rye, New York 10580	Re-Elect Thurmond Committee South Carolina	Media Advertising	9-28-78	\$ 2,18
	Aggrepate General Election Expenditure for this Candidate - 5 21 244 . 34			
Full Name, Mailing Address and ZIF Code of Each Pavee	Name of Feorral Canoidate Supported, State, District & Office Soupht	Farticulars of Expenditure	Date Imphan, Gey, year)	Amour
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
N	Apprepate General Election Expenditure for this Candidate - 5 (2) (246.3)			-
Full Name, Mailing Address and ZIP Coor of Each Payer	Name of Federal Candicate Supported, State, District & Office Sought	Particulari of Expenditure	Date imports, day, year)	Amour
Theron H. Peace 2508 Sunset Blvd. West Columbia, S. C. 29169	Re-Elect Thurmond Committee South Carolina	Accounting Services	9-28-78	1,47
	Apprepate General Election Expenditure for this Candicate - 5 21246, 31			ide al An
Full Name, Mailing Adoress and 21P Code of Each Payee	Name of Federal Candidate Subported. State, District & Office Soupht	Particulars di Expenditure	Date imonth. Cav, vearl	Amou
South Carclina Legionaire P. O. Box 1451 Columbia, S. C.	Re-Elect Thurmond Committee South Carolina	Newspaper Advertising	9-28-78	42
57 - 240	Appresant General Election Excenditure Tor this General - 5 (2) 1 244(- 1267		1	
Full Name, Navins Address and 21F Coor of Each Faver	Name of Pederal Candidate Subborses State: District & Office South	Particulari d'Experionale L	Lass montr. Des vert	Amou
South Carolina State Fair P. O. Box 393 Columbia, S. C. 29202	Re-Elect Thurmond Committee South Carolina	Exhibit Space	5-28-78 	2
	Appressio General Electricit Extendination and tenter a			ż.
SUETOTAL CONCEPTION DURING THE SUCH ICON		a de la companya de la		1

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## ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE

(Supporting Line 24, FEC Form 3)

(To be used only by Political " timmines in the General Liettical

frame of Europical Commissee in Full

If YES, name the orsignating committee: Full Name, Mailing Appress and ZIP Code	I Name of Federal Candicate Supported.	Particular of Expenditure		
of Each Paver	Suit, District & Office Soupht	Particulari di Expenditure	Care imonin,   Gay, year)	Amoun
Gramling Specialty Advertising Co. 130 Centre Street P. O. Box 461 Orangeburg, S. C.	Re-Elect Thurmond Committee South Carolina	Advertising Services	9-28-78 5	1,2
29115	Appresate General Election Expenditure to this Candicate - 5 2.1 244. 31			
Full Name, Mailing Address and ZIP Code of Each Favee	Name of Federal Candidate Supported, State, District & Office Soupht	Farticulars of Expenditure	Car, year)	Amoun
Photo Vision 1117 Gladden Street	Re-Elect Thurmond Committee	Film Production	9-28-78	1
Columbia, S. C. 29205	South Carolina			
A 	Apprepair General Election Expenditure for this Candicute - 5,21246,39			-
Full Name, Maning Address and ZIP Code of Each Pavee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date importh, day, year)	Amoun
Cromers P-Nuts P. O. Box 163 Columbia, S. C. 29202	Re-Elect Thurmond Committee South Carolina	Novelties	9-28-78	1:
F	Apprepare General Election Expenditure for this Candidate - 5 21246 34			
Dill Name, Mailing Address and ZIP Coot of Each Faver	Name of Federal Candicate Subborred, State, District & Office Sought	Particulars of Expenditure	Date Imonth,	Amoun
Souvenir Program Committee S. C. State College P. O. Box 1705 Orangeburg, S. C.	Re-Elect Thurmond Committee South Carolina	Advertising Services	9-28-78	15
29117	Appresate General Election Expenditure to: Itin Candicate - 5 (21)46.361		1	
of Late Faver	Nemie of Februar Cendicalis Subbolies State: District & Office Soupht	Persieuran d'i discene cure	Can wear.	Ampu"
IBM Corporation F. C. Box 1981 Atlanta, Georgia 30301	Re-Elect Thurmond Committee South Carolina	Typewriter	9-28-78	5
	Apprepara General Election Extenditory			
LETCTAL STRACKING SURES IN S EXCE ICONO				5

### ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE

(2 U.S.C. 4:1a(d))

(Supporting Line 24, FEC Form 3)

To be used only by Political "mmmmmers in the General Electrical

Ter Line 24, FEC Form 3

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frame of	Folitical Committee in Full	

has your Committee been designated to mar If YES, name the designation committee	Republican National a	nd/or respective	State Col	LEittee
Full Name, Mailing Address and ZIF Code of Each Paver	Name of Federal Candidate Supported, State, District & Office Soupht	Farticulan of Expenditure	Dair impnin, Cay, vear)	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
	Apprepare General Election Excenditure for this Candicate - 5 (2) (-) (1) - 5 -1			
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Soupht	Farticulars of Expenditure	Date Importo, Cas, year)	Amount
Columbia Office Supply Company 1112 Lady Street P. O. Box 327	Re-Elect Thurmond Committee South Carolina	Envelope Stock	9-28-78	33:
Columbia, S. C. 29202	Appreprie General Election Expenditure for this Canoidate - 5:21246.39			-
Full Name, Mailing Address and 21P Code of Each Pavee	Name of Federal Candidate Subbortes, State, District & Office Sought	Farticulars of Expenditure	Date imonth, Gay, yearl	Arabuni
Professional Computer Service, Inc. 2650 E. Main Street Spartanburg, S. C. 29303	Re-Elect Thurmond Committee •South Carolina	Computer Services	9-28-78	3,33
	Apprepare General Election Expenditure for this Candidate - 521-246 39			
Full Name, Mailing Address and ZIP Code of Each Pavee	Name of Federal Candidate Subborled, State, District & Office Soupht	Particulars of Expenditure	Date (month, cav, year)	Amoun
Covington-Quinn- Dicely 1703 Gervais Street Columbia, S. C.	Re-Elect Thurmond Committee South Carolina	Printing Services	9-28-78	2,631
	Apprepris General Election Expensioner tor the Canadare - 5 2 1911, 37		-	1
uil Name, Maning Accress and 21P Cook of Each Paver	Name of Federal Candidate Subdities, State District & Diffice Souch-	Particulari di Sebenditure	Date imposity Date veath	
Gregory Electric Co. F. O. Drawer 1419 2124 College St. Columbia, S. C.	Re-Elect Thurmond Committee South Caroline	Repairing	9-28-78	3
	Apprecias General Decoret Expendition territis Generation of CONTEND 201			1
JETOTAL C' CADING LETE ING SAP IETIC	sec.2			5

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### The second second states and the second seco POLITICAL BERTY COMMITTEES OR DESIGNATED AGENTIS) ON BEINE FOR CANDIDATES FOR FEDER OFFICE (2 U.S.C. 441a(d)) (Supporting L 4: 24, FEC Form 3)

I or Line 24, FIC Form 3

ITo be used only by Political Committees in the General Election)

Isame	of Folinical	Committee in	Full

### National Republican Senatorial Committee - Expenditures

Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Soupht	Famiculan of Expenditure	Date imonsh, Gay, year)	
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
	Apprepare General Election Expenditure for this Candidate - 5 21044 - 34	and the second second		
Full Name, Maining Adoress and ZIP Code of Each Favee	Name of Feberal Canbidate Subported, Stete, District & Office Sought	Particulars of Expenditure	Date tmonth, Cay, year)	
Action Graphics 532 Knox Abbott Drive Scayce, S. C. 29033	Re-Elect Thurmond Committee South Carolina	Printing Services	9-28-78	43.
?	Apprepate General Election Expenditure for this Candicate - 5 21246.39	Maria and Anna and A		-
Pull Name, Mailing Address and ZIP Code of Each Favee	Name of Federal Candidate Supported, State, District & Office Souphi	Farsiculars of Excenditure	Dett imonth, dev, yearl	Amount
Cierox Corporation O. Box 36084 M Sittsburgh, Pa. 15250	Re-Elect Thurmond Committee South Carolina	Equipment (Copy Machine)	9-28-78	33
- 121	Appreciate General Election Expenditure for this Candidate - 5 21 14 ( . 34	la construction de la construcción de la construcci		L
Auli Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candicate Supported, State, District & Office Souphi	Particulars of Expenditure	Date Imonit, Gev. vearl	Amoun
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
	Apprestit General Biestion Expenditure 1 for this Canadate - 5 1 1911 - 267			n - 677
Fuil Name, Mailing Address and ZIF Code of Each Faver	Name of Federal Canolicate Supported State District & Office Souph	Farticulari d'Excenditure I	Carl import.	A7.027
R. L. Eryan Company P. O. Box 368 Columbia, S. C. 29202	Re-Elect Thurmand Committee South Carolina	Printinç Services	9-28-78	11
	L Cappeone General Electrics in Generation Lectrics Constants - S. J. [1944] - 35 [	8		

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. D.C. 20463

(2 U.S.C. 11a(d)) (Supporting L is 14, FEC Form 3)

For Line 24, FLC Form 3

(To be used only by Political Committees in the General Electron)

Name of Political Committee in Full

UN ULIMET

If YES, name the designatine committee:	Republican National at		State Con:	NO zittee
Full Name, Mailing Adoress and ZIP Coor of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Partipulars of Expenditure	Date imoniti, Gay, 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
	Agprepare General Election Expenditure for this Candidate - 5 /566.55	1		
-ull Name, Mailing Address and 21P Code of Each Payee	Name of Federal Candidate Supported. State, District & Office Sought	Partituian of Expenditure	Date Imprim, Gay, yearl	Amount
Market Opinion Research 29 West Adams Detroit, Michigan 48226	Brooke Committee Massachusetts	Telephone polling	9-27-78	ح 20,200
ίΩ.	Apprepare General Election Expenditure for this Candidate - \$ 21632.45			-
DI Name, Mailing Address and 2IP Code of Each Paver	Nome of Peperal Canoicate Supported. State, District & Office Soupht	Fartiquian of Expenditure	Date importh, day, year)	Amount
Mike Kelly 5680 S. Syracuse Circle Shite #118 Englewood, Colorado 80111	Armstrong Campaign Committee Colorado	Folitical Consulting	9-29-78	3,00
c	Aggregate General Election Expenditure for this Canologia - 5 \$40.00			
Sull Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, Strite, District & Office Sought	Particulars d'Experioriture	Date smonth, Car, year)	Amoun
National Direct Mail . Services, Inc. Suite #400 2233 Wisconsin Ave.,N.W Washington, D.C. 20007	Armstrong Campaign Committee Colorado	Direct Mail Services	5-29-78	18,3
	Apprepara General Executor Expenditure tor this Candidate - 5 0.4 0.570	Particulari di Sacendi uni	1 Jan mentri	ATTOT
uli Name, Mailing Address and 21F Code of Each Faver	State, District & Drivet Soucht 1	randon o como o com	2211 (TOPIC) 221, 1221 (	
Mountain Bell Telephone F: C. Drawer 17-J Denver, Colcrado 80117	Armstrong Campaign Committee Celerade	Telephone service	9-19-78	3,6
	Apprepare General Excelor Extend fore ter mit Candidate - 5 547000			
		24.4		1

-11, N.W.

. D.C. 20463

For Line 24, FED Form 2

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(To be used only by Political mimmens in the General Election)

(2 U.S.C. (41a(d)) Supporting Line (A, FEC Form 3)

Isome of Folisical Committee in Full

If YES, name the orsionating committee: R. Full Name, Mailing Address and ZIF Code	Name of Federal Candicate Supported,	Farticulars of Expenditure	Date importe, 1	Amount
of Each Payer	State, District & Office Sought		day, year)	
Tom Horner Suite #164 8120 Penn Ave.,South Minneapolis, Mn. 55431		Consulting Services	9-29-78	\$ 3,000
	Appreçate General Election Extenditure for this Candidate - \$ 65:037 39	- interaction		
Auli Name, Mailing Adoress and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Soupht	Particulars of Expenditure	Date imonth, Gay, year)	Amount
Northwestern Bell Telephone Co. 1432 Soo Line Blåg. Minneapolis, Mn.	Durenberger for Senate Minnesota	Telephone Services	9-29-78	2,371
55402				
10	Apprepare General Election Expenditure for this Candidate - \$ 6.8037, 39			-
of Each Paver	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Car, vearl	Amount
Paul Overgaard Suite #164 6120 Penn Ave.,South Minneapolis, Mn. 55431	Durenberger for Senate Minnesota	Consulting Services	9-29-78	4,500
C	Aggregate General Election Expenditure for this Condicate - \$ (5057.39			
ull Name, Mailing Aboress and 21P Code of Each Payee	Name of Federal Canoicate Supported. State, District & Office Sought	Fartiliait of Expenditure	Ditir imonth.	Amount
Market Opinion Research 28 West Adams Detroit, Michigan 48226	Durenberger for Senate Minnesote	Telephoning Poll	9-29-72	8,850
1	Appresant General Extendet Extendeture for the Centerion - 1 65057. 37	1		
ul. Name, Making Adoress and 21F Code of Each Pavee	Name of Prosisi Canologin Subbried, State District & Office Source	Particulan of Experior une	Date imports and, years	Ampun
Christopher D. Lord 5401 Westbard Ave. Apt. #1507 Bethesda, Md.	Martin for U.S. Senate Alabama	Consulting Services	9-29-78 .	• 20
20016		J	lit.	
1.4	Apprentie General Brezhon, Eksendinture Rohmin Dinosozie - S. 2010 - 1910 - 19			
SETCIAL C' experientures this page leption	nati.			5

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1. D.C. 20463

For Line 24, FEE Form 2

(To be used only by Political any motives in the General Election)

(2 U.S.C. (41a(d)) Supporting Line (4, FEC Form 3)

Name of Foirtical Committee in Full

National Republican Senatorial Committee - Expenditures has your Committee been pesignated to make coordinated expenditures by a political party committee If YES, name the orsionation committee: Republican National and/or respective State Committee Full Name, Mailing Address and ZIP Coor Name of Federal Candicate Supported, Farticulars of Expenditure Date smonth, Amount State, District & Office Soupht of Each Pavet Cey, vear) Monarch Printing Citizens for Percy 9-29-78 \$ 4,170. Printing Corporation Illinois Services 1130 West Adams St. Chicago, Illinois 60607 Appregate General Election Expenditure for this Candicate - 5 716.4.41 Full Name, Mailint Address and 21P Code Name of Federal Candidate Supported, Farticulars of Expenditure Date imonth, Amount State, District & Office Southt Cay, year! of Each Payee Olga V. Simpson Citizens for Percy Consulting 9-29-78 1,000. Suite #308-A Illinois Services 901 6th St., S. W. Washington, D. C. 20024 Appresate General Election Expenditure 10 for this Candidate - 541621.41 Will Nume, Maning Address and ZIP Coor Name of Federal Candidate Supported, Farticulars of Expenditure Date importh, Amount of Each Faver State, District & Office Soupht Cay, year! 10 National Direct Mail Citizens for Percy Direct Mail 9-29-78 200. Illinois Services Services, Inc. Suite #400 2233 Wisconsin Ave. Washington, D. C. Agoresate General Election Expenditure 20007 for this Candicate - 5 41626.41 ull Name, Manne Appress and ZIP Coor Name of Federal Canoicate Supported. Particulars c: Expenditure Delt imonth, Ampunt State, District & Office Sought Cav. vear) of Erch Pryet Staley & Fox, Inc. Committee for Mecia 9-25-78 21,968. 850 Third Avenue Senator Griffin Advertising New York, New York Michigan. 10022 Appressite General Election Expenditure tor this Canadate - 5 /500 - 10. 413 Name of Feberal Canpibilie Supportes Particulars of Experior unit DAN IMPOST. A \*12 J \*! un learne, Maning Appress and ZIP Cope State, District & Office Scuott GAL VEP! of Bach Paves Committee for 5-29-75 .11. Staley & Fox, Inc. Media 850 Third Avenue Senator Griffin Advertising New York, New York Michican 10022 Apprepase Genera Erettion Extenditure 10 104 Consider - 5 1 5 26400.12 TETETAL of excenditures and page sections : . 1 TAL this period light days this line number privi-

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### (2 U.S.C. (stald)) Supporting Line 14, 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

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Full Name, Mailing Address and 21P Code	Republican Nationaland	and the second se		
of Each Payer	Name of Peoeral Candidate Supported, State, District & Office Soupht	Particulari of Excenditure	Date importh, Cay, year)	. Amoun:
Bruce Hildebrand 192 Twiggs Corner Peachtree City, Ga. 30269	Bell for Senate Committee New Jersey	Consulting Services	9-29-78	\$ 1,000
	Apprepate General Election Expenditure for this Candidate - \$) 1/ 750			
Full Name, Mailing Address and ZIF Coor of Each Payer	Name of Federal Candidate Supported, State, District & Office Soupht	Particulars of Extenditure	Date Imposti, Gay, year)	Amount
Market Opinion Research	Humphrey for Senate New Hampshire	Poll Services	9-29-78	200
West Adams Atroit, Michigan 48226				5 a
io	Apprepare General Election Expenditure for this Candidate - \$ 15,200			
et Each Pavee	Name of Federal Candidate Supported, State, District & Office Soupht	Particulars of Expenditure	Date imonth, Gay, yearl	Ampun;
Bbot Walton & Associates Txecutive Building 6324 Douglas Street Imaha, Nebraska	Shasteen for Senate Nebraska	Advertising Services	9-29-78	2,840
68102	Aggregate General Election Expenditure for this Candidate - 5 5 9 40 .73			
Full Name, Mailing Adoress and 21P Cooe of Each Pavee	Name of Federal Candidate Supported, State, District & Office Soupht	Particulars of Extenditure	Date imonth, Day, year)	1 400001
			•	
<u>(</u> )	Apprepase General Election Expenditure : for this Zano-dati - S			
Gui Name, Maring Address and ZIP Coor of Each Paver	Name of Pedera Canciloziti Supported, State, District & Otflice Souchs	Ferniculari or Excerto run	Deit imposin. Sev. yteri	-7.5
	Apprepase General Election Expenditure for the Candidate - S		Service 2	1
JETOTAL of expenditures this sept loging	Manager and a survey of the second The Cold	AND IN ORIGIN STRATTON	- No alla selet	5
OTAL this bened light page this une number	er entul			5

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For Line 24, FEC Form 2

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(To be used only by Political committees in the General Election)

Name of Political Committee in Full

National Republican Senatorial Committee-Expenditures Hes your Committee been designated to make coordinated expenditures by a political party committee? and/or respective State Condittee If YES, name the designating committee: Republican National Full Name, Mailing Appress and 21P Code Name of Federal Candicate Supported, Fasticulars of Expenditure Date imports. Amount State, District & Office Sought of Each Payer Cer. year! American Express Company Miscellaneous Citizens for Percy 5 111 N. State St. Illinois Charges 9-22-78 Ŝ 724. Chicago, Illinois 60606 Appregate General Election Extenditure 10" this Candidate - 5 4-1676.141 Full Name, Mailing Address and 21P Code Name of Federal Candidate Supported, Particulars of Expenditure Date Imonth. ATTIOUNI of Each Faver State, District & Office Sought Cay, wear) 5 Avis Rent A Car Car Rental 9-22-78 Citizens for Percy 763. 201 N. Dearborn St. Illinois hicago, Illinois 60601 8 To Apprepate General Election Expenditure for this Candicate - 5 4/ 6.26.41 Name of Federal Cancicate Supported, Date importh, "All wame, Making Address and ZIP Code Particulars of Expenditure Amount State, District & Office Suupht of Each Faver Can, year) Sailey, Deardourif & Assocs. Suite #1120 Citizens for Percy Madia Advertising 9-22-78 .7,500.0 733 - 15th St., N. W. . Illinois Washington, D.C. 20005 Apprepate General Election Expenditure for this Candidate - 5 41176.41 C Bull Name, Mailing Appress and 21P Coot Name of Feberal Candidate Supported. Farticulars d' Sabensiture Case Imphth, Amount State, District & Office Soupht cay, yearl of Each Feyer Citizens for Percy Printing services 9-22-78 55C. Budget Quick Print 507 W. Jackson Blvd. Illinois Chicago, Illincis 60506 Appreciate General Election Expenditure tor this Consident - 541/2 41 Name of Papera Candidate Succorrec. Farticulars of Experio cure alt IT ptit. Full Name, Marine Address and ZIP Code Amour State , Dattid: & Office South: Chine weath of Each Favet 9-22-78 Clark Aviation, Inc. Citizens for Ferry Charter service 616.0 Illincis Eloomington-Normal Airport Aleanington, Illincis 61701 Appressie General Dietigen Erterge gen ter this Gane date a to day a 2

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-1, N.W. . D.C. 20463

### (2 U.S.C. (-11a(d)) upporting Line 20, FEC Form 3)

(To be used only by Political committeer in the General Election)

Name of Political Committee in Full

has your Committee been designated to ma			ES [	ONC
If YES, name the designating committee: Full Name, Mailing Address and 21P Cooe	Pontiblican National Name of Federal Candidate Supported,	Britalian of Expenditure		
of Each Pavee	State, District & Office Sought	Faritzoian of Expenditure	Date imports, Cay, year)	. Amount
			Car, vesti	
Lambert Field Airport 7.0. Box 10014 St. Louis, Missouri 63145	Citizens for Percy Illinois	Charter service	9-22-78	\$ 452.3
	Appresate General Election Expenditure for this Candinate - 5 4 / (			
Pull Name, Mailing Address and ZIP Code of Each Payre	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Experiorities	Date (month, cer, year)	. Amount
The Racquet Club of Shicago 1965 N. Dearborn Pkwy. Dicago, Illinois 60610	Citizens for Percy Illinois	Reception	9-22-78	5 776.2
0	Apprepate General Election Expenditure for this Candidate - 5 4626,4/	and a second second		
Name, Mailing Address and 21P Code of Each Pavee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Carr, vear)	Ampunt
tility Stationery Foom 704 6 S. Wabash Dicago, Illinois 60603	Citizens for Percy Illinois	Office supplies	9-22-78	۲ 416.42
	Aggregate General Election Expenditure			
C	tor this Candidate - 5 4/6.26 .4/1		1	
ull Name, Mailing Address and 21P Code of Each Payee	Name of Federal Candicate Supported, State, District & Office Soupht	Particulars of Expenditure	Date imonth, day, year)	Amount
Conarch Printing Corp. 	Citizens for Percy Illinois	Frinting services	9-22-78	۳ 1,885.00
Thicago, Illínois 60607 .	Apprepate General Liestign Expenditure for this Considere - 5 41624, 41			40.
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## (2 U.S.C. 141a(d)) Supporting Line 4, FEC Form 3)

ITo be used only by Political Comments in the General Section)

#### Name of Folitical Committee in Full

. .

National Republican Senatorial Committee - Expenditures

If YES, name the designating committee: R	epublican National and		State Com	ittee
Full Name, Mailing Adores and 21P Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Farticulars of Expenditure	Gey, year)	. Amount
Ronald Roberts 3205 Blome Road Cincinnati, Ohio 45243	Sen. Griffin, Michigan, U.S. Senate	Consulting Expenses	Sept. '78	\$798.
	Appresate General Election Expenditure for this Candidate - 5 150 050-03			
Pull Name, Mailing Address and 21P Cods of Each Payee	Name of Pederal Canoidate Supported, State, District & Office Sought	Particulars of Expenditure	Date impositi, Gev, veerl	- Amoun
Ronald Roberts 5205 Blome Road Fincinnati, Ohio 45243	Sen. Percy, ILL, U.S. Senate	Consulting Expenses	Sept. '78	\$519.5
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of Each Payes	Name of Federal Candidate Supported,   State, District & Office Soupht	Particulars of Expenditure	Date Imonth, day, year)	Amoun
Conald Roberts 205 Blome Road. Cincinnati, Ohio 45243	Sen. Tower, Texas U.S. Senate	Consulting Expenses	Sept. '78	\$1,36
C	Apprepate General Election Expenditure ] tor this Candidate - \$ 52,543. US			
Full Name, Mailing Address and 21P Code C <sup>ab</sup> of Each Pavee	Name of Federal Candidate Supported, State, District & Office Sought	Particulars of Expenditure	Date Imonth, cay, yearl	Amour
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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

Paragraph 1 -- No problems

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.

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.

> > 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

FHI Tonly problem was with Paragraph 4

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.". 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. 1528
 Election Commission
 Street, N.W.
 short, D.C. 20403

Comparent Transfers Out, Contributions In-Kind, Luans, Luan Repayments mid Retunds Mane) Supporting Lines 20a, 2 and 22a, 22b, and 22c of FEC FORM 3

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Name of Candidate or Committee in Full

National Republican Senatorial Committee

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Martin For U. S. Senate P. O. Box 3406	Sec. 441 Contribution	10-6-78	\$17,000.00
Birmingham, Alabama 35205	Expenditure for: D Primers D General D Othe		
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r.	Expenditule for:		06
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	Expenditure fot: D Primery D General D Othe	, <u> </u>	3400
Full Name, Mailing Address and 21P Code	Particulars of Experioriture	Date (month, Day, year)	Amount of each expend ture tail period
A STATE AND A STATE OF A	Expenditure for: D Primars D General D Othe		
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TOTAL this period lisst page this line humber only)		March Market 1806	\$17,000.00



## FEDERAL ELECTION COMMISSION

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

		6
	MEMORANDUM TO:	CHARLES STEELE
	FROM:	MARJORIE W. EMMONS M
1.7	DATE:	FEBRUARY 6, 1979
0		
\$	SUBJECT:	MUR 820 - Interim Investigative Report dated 1-31-79: Signed by GC 2-2-79;
2		Received in OCS Friday, 2-2-79, 5:06
10	The above-na	amed document was circulated to
-		
C	the Commission of	n a 24-hour no-objection basis
	at 12:00, Monday	, February 5, 1979.
C:	There were	no objections to the Interim Investigative
c	Report.	
~		

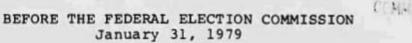
February 2, 1979

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.





79 FEB 2 P5: 06

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COTTRY

In the Matter of

National Republican Senatorial Committee MUR 820

#### 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.

William C. Oldaker General Counsel

January 31, 1979

file 82

MEMORANDUM

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TO: Tom Haselhorst

Orlando B. Potter William C. Oldake THROUGH: FROM: Kathy Petkins

SUBJECT: Reports Analysis Review of the Jim Martin for Senate Committee S1 and S2

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.

Br # 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

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

1033 M STREET. N.W. WASHINGTON, D. C. 20036

(202) 293-2505

January 10, 1979

OF COUNSEL

MICHIGAN OFFICES 15090 WEST TWELVE MILE ROAD SOUTHFIELD, MICHIGAN 48076 (313) 559-2828

Re: M U R 820

1.5

#### 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.

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Bill Brock Chairman

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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 ruly yours,

BILL BROCK

BB/bnp

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



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



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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.
- 0 1 0 1 (5) 2 6 1 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.

1578 Dated Au 221 1978 at Washington D. C

National Republican Senatorial Committee

Ala	bama	Republ	ican	Executi	ve Comm	ittee
By	lu.V.	Ľ.	$\mathbb{D}$	Lai	~	
	Will	liam D.	Harr	is		

Chairman Title

1978 at ted

Birmingham, Alabama



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

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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:

- 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.
- Such amount of allowed expenditures under said provision has been computed tentatively by the Federal Election Commission as the amount of \$62,507.00.
- That State wishes to designate Senatorial its agent for the purpose of making such expenditures up to the amount of \$62,000.00
- 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.
- Senatorial agrees to make such expenditures in behalf of candidate, or if itsisany 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.

National Republican Senatorial Committee

Title

Alabama Republican Executive/Committee

By

Title Chairman

Dated 1978 at Washington, D. C.

Dated\_\_\_\_\_1978 at Birmingham, Alabama



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

Ln

Dwight D. Eisenhower Republican Center: 310 First Street Southeast, Washington, D.C. 20003. (202) 484-6500.

Political Financial Services

901 L'Enfant Plaza Center, S.W. Washington, D.C. 20024

(202) 554-2206

Stan Huchaby Res: (202) 554-4679

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Pederal Campaign Dinancial 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 Sentate, 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, Han Heckelog

Stan Huckaby

#### 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. 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.

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.

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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 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.

H. Smith Smith

Rodney A Smith Treasure, National Republican Senatorial Committee

Sworn to and subscribed before me a notary public in and for the District of Columbia this <u>II</u> day of January 1979.

Taures

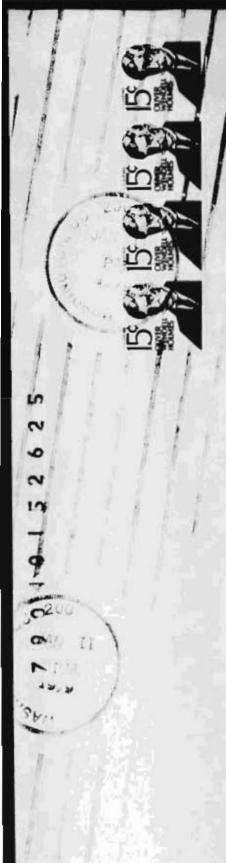
Notary Public My commission expires 5 31. 83

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JENKINS, NYSTROM & STERLACCI, P.C. 2033 M STREET, N.W., SUITE 504 WASHINGTON, D.C. 20036

WASHINGTON, D.C. 20036

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

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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

January 9, 1979

OF COUNSEL

179 JAN ALCHINAN OFFICED

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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 LAW OFFICES

## JENRINS, NYSTROM & STERLACCI. P.C.

2033 M STREET, N.W. WASHINGTON, D. C. 20036

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Charles N. Steele, Esq. M. 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 lype
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.

### January 5, 1979

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

Please have the attached Interim Investigation Reppet on MUR 820 distributed to the Commission on a 24 hour no-objection basis.

Thank you.

## BEFORE THE FEDERAL ELECTION COMMISSION 5 P 1: 25 January 3, 1979

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.

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- THE

CTARY

General Counsel



#### 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:

- 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 ("§44la(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.

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:

- 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 "§44la(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 gomsel

Associate General Counsel

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#### 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 320. The Commission has reason to believe that the matters allged in the complaint state a violation of 2 U.S.C. 5441a(d). Specifically, it appears that:

- NRSC reports filed with the Commission on October 10, 1973 (October Monthly Report) and on October 28, 1978 (10-Day Pre-Electdon 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 cumpaign was \$125,013.38 -- approximately \$86,687. less than already reported by the NRSC.

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The above facts support the Commission's finding of remain 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 apportunity 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:

- 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) bxpenditures" made by the NRSC in connection with James Martin's Senatorial cappaign in Alabama made by the NRSC.

Where approppiate, 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 **g**ou 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 ws in writing.

Sincerely,

William C. Oldherr Congral Counsel

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### BEFORE THE FEDERAL ELECTION COMMISSION

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

### 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. Chanen

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



## FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO:	CHARLES STEELE
FROM:	MARJORIE W. EMMONS MORE lype
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

43 HOUR TALLY SHEET



FEDERAL ELECTION COMMISSION 78 DEC 20 P4: 39

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

Date and Time Transmitted: Dec. 20, 1978 - 3:3

JF THE

C.MMI ....... SECKETARY

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

(X) I approve the recommendation

( ) I object to the recommendation

COMMENTS: Wishful thereing that Martin was the candedate of the Republic in numbered paragraph # 200 page 1, so presume it should be Republican ( theuse he would have won

Date: 120/78 Signature: Nelliam L. Springle

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.

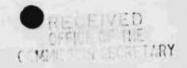


### DEcember 20, 1978

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.





FROM:

### FEDERAL ELECTION COMMISSION

# 78 DEC 20 All: 42

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

December 19, 1978

TO: THE COMMISSION

WILLIAM 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.



### 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:

- 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.
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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-

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:

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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

### BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of National Republican Senatorial Committee

MUR 820 (78)

### 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:

- 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.
- 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)

Page 2

MUR 820 (78) General Counsel's Report Dated: December 6, 1978 CERTIFICATION

> 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

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

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### FEDERAL ELECTION COMMISSION

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

MEMORANDUM T	O: CHARLES STEELE	
FROM:	MARJORIE W. EMMONS MISHE by pe	
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 abo	ve-named document was circulated on a	
	basis at 9:00, December 7, 1978. fice was notified via a certification at	
11:30, Decem	ber 11, 1978, that the recommendations were	
approved by	a vote of 4-0.	
Commiss	ioner Aikens submitted an objection at 11:50,	
	1070 IL 1010 1000 1000 IL 1010	

December 11, 1978 thereby placing MUR 820 on the Executive Session Agenda for December 13, 1978.

Please destroy the above-mentioned certification.

December 6, 1978

MEMORANDUM TO:	Marge Emmons
PROM:	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.

EDERAL ELECTION COMMISSI EDEIVED 1325 K Street, N.W. OFFICE OF THE Washington, D.C. 20463

FIRST GENERAL COUNSEL'S REPORT 5 P3: 18

DATE AND TIME OF TRANSMITTAL 6 1978 BY OGC TO THE COMMISSION DEC

MUR NO. 820 DATE COMPLAINT RECEIVED BY OGC STAFF MEMBER Perkins/Thedford

SOURCE: Donald Stewart U.S. Senate Committee (The Friends of Donald Stewart Committee)

RESPONDENT'S NAME: National Republican Sentorial 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, 2 Alabama Republican Party - Federal Account, Republican National Committee, 10 Democratic National Committee, Democratic Senatorial Campaign Committee, DNC Services Corporation; AO 1976-108. FEDERAL AGENCIES CHECKED:

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#### BACKGROUND

C 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.

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:

4	(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
3	any expenditure in connection with the general election campaign of a candidate for Federal office in a State who
10	is affiliated with such party which exceeds (A) in the case of a candidate for election to the
-	office of Senatorthe greater of
0	<ul><li>(i) two cents mutiplied by the voting age population of the State; or</li></ul>
3	(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 T 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 in 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. C

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 guestion of payment of official expenses of senators by the NRSC. 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. 1	Weicker	:) 9/	13/78	\$70.00
Subscription	(Sen. 1	Weicker	:) 9/	13/78	19.50
Subscription	(Sen. 1	Weicker	:) 9/	13/78	30.60
Film Processi	ng (Sei	n. Weid	cker)	9/13/78	101.59
One Photo (Sen	n. Jav	its)	9/	13/78	15.75
Public Affairs	s Coun	sel (Se	en Dol	e) 9/13	3/78-1,000.00

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":

C .	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
C	Typing Services (Dave Durenberger, U.S. Se	nate) 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

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1. Letter to Respondent.

2. Copy of complaint.



### 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:

- 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 ("§44la(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.

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 Ŝ 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-\$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:

- 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 "§44la(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.
- 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.

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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





Office of the General Counsel Federal Election Commission 1325 K Street, N.W. Washington, D. C. 20463

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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', 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

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,

anis Howard Stewart

AMES HOWARD STEWART, JR. 3701 Knollwood Drive Anniston, Alabama 36201 Telephone Number (205) 236-5367

Campaign Chairman

Office of the General Counsel Federal Election Commission Page 3

### 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 Rday of November,

1978.

Notary Publi

### APPENDIX A

### PARTY SPENDING LIMITS FOR CONGRESSIONAL CONTESTS

			and the second se
PARTY COORDINATED		VAP	1978 Party
EXPENDITURE LIMITS - 1978	State	(in thousands)	Spending Limitations
Under the Federal Election Campaign Act, as amended,			Among and a state of the state o
and the FEC regulations, there are special limits on expen-	Alabama	2.543	\$62,506.94
	Alaska*	258	24,580,00
ditures made by political parties on behalf of candidates in	Arizona	1,562	38,393,96
the general election (2 U.S.C. §441a(d), 11 CFR 110.7).	Arkansas	1,494	1/2812.578.87
These special party expenditures count neither as contribu-	California	15,627	36,722.52
tions to the candidate not as expenditures by the candidate	Colorado		384,111.66
or the candidate's authorized committees. The expenditures	Connecticut	1,828	44,932.24
must, however, be reported by the party committee on		2,238	55,010.04
Schedule F, FEC Form 3, revised January 1978.	Delaware*	407	24,580.00
Construction of the second second second	Florida	6,219	152,863.02
	Georgia	3,450	84,801.00
Salat to the second second second second	Hawaii	615	24,580.00
National political party committees have separate expendi-	Idaho	574	24,580.00
ure limits for Senate and House candidates in the general	Illinois	7,873	193 518 34
lection.	Indiana	3,690	90,700 20
**	lowa	2,075	49,774.50
itate political party committees are entitled to separate	Kansas	1,664	40,901.12
spenditure limits for Senate and House general election	Kentucky	2.402	59.041.16
andidates in their State, Within a State, all expenditures	Louisiana	2,609	
nade on behalf of one candidate by the State party com-	Maine	755	64,129.22
nittee or any subordinate party committee [e.g., county,	Maryland	2 921	24,580.00
listrict, local) are subject to one expenditure limit.	Massachusetts		71,799.18
intrict, rocarl are subject to one expenditure limit.		4,166	102,406.28
	Michigan	6,284	154,460.72
the formulas for the party spending limits in 1978 are	Minnesota	2,765	67,963.70
based on State voting age population estimates (as of July	Mississippi	1,575	38,713.50
, 1977) from the Department of Commerce, and the Con-	Missouri	3,417	83,989.86
umer Price Index increase certified by the Secretary of	Montana	523	24,580.00
abor. They are calculated as follows:	Nebraska	1,095	26,915.10
	Nevada	439	24,580.00
enatorial	New Hampshire	594	24,580.00
State Voting Age Population (VAP) x 50.02, plus the	New Jersey	5.224	128,405 92
1978 increase in the Consumer Price Index (CPI) of	New Mexico	783	24,580.00
22.9 percent; or \$24,580.00, whichever is greater,	New York	12,879	316,565.82
(See chart below.)	North Carolina	3,864	94,977,12
	North Dakota"	450	24,580.00
ongressional :	Ohio	7,484	
1) \$12,290.00, for House candidates in States with more	Oklahoma	1,994	183,956.72
	Oregon		49,012.52
than one district (and candidates for Delegate from		1,695	41,663.10
the District of Columbia, Guam and the Virgin	Pennsylvania	8,508	209,126.64
Islands; or for Resident Commissioner from Puerto	Rhode Island	673	24,580.00
Rico); or	South Carolina	1,953	48,004,74
2) The Senate limit for the State, for House candidates	South Dakota	475	24,580.00
in States with only one district. (See chart below.)	Tennessee	3,028	74,423.24
	Texas	8,773	215,640.34
	Utah	797	24,580.00
10 M 10 M 10 M 10 M 10 M 10 M 10 M 10 M	Vermont*	336	24,580.00
the second second second second second second second second second second second second second second second s	Virginia	3,631	89,249.98
PARTY SPENDING LIMITS	Washington	2,589	63,637.62
FOR SENATE CANDIDATES	West Virginia	1,313	32,273.54
The Commission has compiled the following chart for	Wisconsin	3,244	79,737.52
1978 limits on party spending for Senate candidates in the	Wyoming	278	24,580.00
eneral election. In the chart, an asterisk (*) indicates those			
States having only one Representative. In these instances,	O'min of		
the Senate limit applies for these candidates instead of the	District of	505	10 000 00
House lumitation. This for these candidates instead of the	Columbia		12,290.00
House limitation. This exception does not apply to candi-	Guam	49	12,290.00
dates for Delegate (District of Columbia, Guam, Virgin	Puerto Rico -	2,010	12,290.00
Islands) or Resident Commissioner (Puerto Rico).	Virgin Islands	59	12,290.00

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## APPENDIX B

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	0 0 2040	REPORT OF RECEIPTS AND EDDE FOR A CANCIDATE OR COMM SUPPORTING CANDIDATES NOMINATION OR ELECTION TO FED IExcept for Candidate or Committee Resolving For	BAL OFFICE	11 55 ×
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T	hand of the second second second second second second second second second second second second second second s	blican Senatorial 5323	2 10 No .CO0091009	Commission and
	states have a dealer with the second	setts Ave., N. E.		
	Washington, I Cit, Sine and 21º Coo	D. C. 20002	Office Sought, State District Lit	Test of Election
1	A Type of Report Icheck	ADD-DD- ate DO-MI		
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	April 10 Guisterty P		self-service service and service s	Termination Report
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	B October 10 duarteri	D TRATATE day report foroming		Inh-ch mparti
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F		SUMMARY OF RECEIPTS AND	EXPENDITURES	
-		IFigures may be rounded to ne		
	S Commenterios July	1 Thomas September 30, 1978	Column A	Column B
	6 Can or hand smaars 1	Concession and the low of the low		15 -0-
	1 Car or tars a beam		\$ 970,588.96	1.
			\$ 1,641,974.14	\$ 3,412,563.10
		Tand & for Column & arctime & and & for Column E-	\$ 2,612,563.10	\$ 3,412,563.10
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	2	tend to the Committee Genardate I tem rear on Schoole C	\$ 147,150.00	- Oktoons
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35		mined this Report and to the pest of my knowledge an	d owned of a true is partect and	complete
	Oct. 10, 1978	Rodney A. Smith, Ireasurer ITsord Name of Treasurer or Canadated	Kounty	I Smith
		erronedus or incomplete information may subject the person reverse side of formi	Long the Report to the periods	erzusc Serrar 437;
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	Contact D	1325 K Street, N Vi Washington, D.C. 20463	er cel. 800-424 9533	B T# 1670 (HOSON) Expense 3 31 85
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		Senatorial Committae-Contributions	FROM	July 1	To September 30, 197
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1		Las Substates of contributions from individuals		1,548,265.14	\$ 3,211,812.32
ļ	13.	Transfers from Port cal Committees (a) Funds from attributed outhorized committee from te on Schedule A repardens of amount!	: .		
		Ibi Funcs from other committees literate on Schedule A regardless of amount). Ici Contributions in fund from political committees		47,263.57	1
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1		Lat tramited face Schedule Al		46,300.91	
1		101 Unitemized	. :	46,300.91	\$ 46,300.91
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		It Subtotal of refur 2 repairs returns of property		144.52	1.282.05
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		et amount' Ib) To other committees (Item ite on Schedule B regerdiess of amount)	;	1,200,000.00	. C.
ł		It Contributions in a nd to other committees Itemize on Schedule Birgerdicts of amount!		1993 F. F.	22 E
I		Id! Subtour of transfers out	5	1,200,000.00	\$ 2,000,000.00
1		Indecendent Expenditures vale Schedule Et	3		1
1	24.	Coordinated Expenditures Made by Political Committees 12 U.S.C. 441a/d/l Ilternate on Scheoure F1			
	25.	Total Expenditures		1,200,000,00	\$ 2,000,000.00
I		RECEIPTS AND EXPENDITURES, NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES			
ł	28.	Toul Recept from line 191			
	27.	Transfers In ifrom time 15tell			
ł	23.	her Receipt ISubtract line 27 from line 261	\$		
	29.	Total Expenditures than two 251	1		
	30.	Transfers Out (from line 22/all			
- 1	-	Hers Excendences (Subtract line 30 from line 20)			Sector Sect

R	POLITICAL ON BE	TID COORDONATED EDUSING PARTY COLMATTEES CA DS HALF OF CANDIDATES FOR I (2 U.S.C. 441a(d)) (Supporting Line 24, FEC F	EDERAL OFFICE orm 3)	Page 1	
Name of Painson Commit	me in Full				
		publican Senatorial Count			140
IT YES, name the designer Full hume, Making Adore al Each Per	ing committee :	Remiblican Kational en Norme of Federal Candora Supported, Sura, District & Office Seaphs	d/or Respective Stat		
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el Excherer Bailey, Deardourff & Associates Suite Ø1120 733 - 15th St., N. W.		Citizens for Percy Illinois	Media Advertising	9-5-78	10,000.00
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Full Name, Manu		publican Senatorial Committ		<b>IS D</b>	
	designating committee :	Republican National and/o	r. Respective State	Comittees	
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Christopher		Martin for U.S.	Computed	9-29-78		
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the dead provent,		And the state of the second	1.4.1		
Col Funds from other committees (Itemize on Schedule & repardens of amount)	1	Link Bar Strattan	1. 11 A		
(a) Contributions in-kind from political committees		A State of the second second	17-5		
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fati Subsected of transfers out.	5 800,000.00	3,507.657.54			
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National Direct Hail Services 4733 Bethesda Ave. Suite #530 Bethesda, Maryland 20014	Durenberger for Senate Minnesota	Postage for direct mail services	10/2/78	5,610.00/
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Martin for U. S. Senate P. O. Box 3405 Birminghas, Alabama 35205	Martin for V. S. Senate Alabama	Section 441 ? Contribution	30/6/75 (	\$ 17,000.
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IT YES, name the designating committee:	Republican National and/or	Respective State Co	Due month, 1	Amoun
et Each Payse	Sure, Disuice & Office Sought		Car, 19.4)	
 Atkinson Advertising Associates 5500 N. Western, Suite 101A Oklahoma City, Oklahoma 73118	Oklahomans for Bob Kauss Oklahoma	Hedia Advertising	10/17/79	\$ 25,000.0
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	and the second se			11



## FEDERAL FEECTION COMMISSION

1335 F.S.(K1) U.S. AV WASHED, 102, 110, 20163

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.

Si prolv Assistant General Counsel

- Starter Briter and Anthenie

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Enclosure



November 3, 1978

Office of the General Counsel Federal Election Commission 1325 K Street, N.W. Washington, D. C. 20463

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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.

> P.O. Box 2274 Anniston, Alabama 36201 (205) 237-9311

27271/3 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

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,

anis Howard Steerant,

AMES HOWARD STEWART, JR. 3701 Knollwood Drive Anniston, Alabama 36201 Telephone Number (205) 236-5367

Campaign Chairman

Office of the General Counsel Federal Election Commission Page 3

## 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 Raday of November,

1978.

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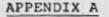
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Notary Public



## PARTY SPENDING LIMITS FOR CONGRESSIONAL CONTESTS

			And and an other statements of the statement of the state
A DE COORDINATED		VAP	1978 Party
PARTY COORDINATED	State	(in thousands)	Spending Limitations
EXPENDITURE LIMITS - 1978			
Under the Federal Election Campaign Act, as amended,	Alabama	2,543	\$62,506.94
nd the FEC regulations, there are special limits on expen-	Alaska	258	24,580.00
itures made by political parties on behalf of candidates in	Arizona	1,562	38,393.96
he general election (2 U.S.C. §441a(d), 11 CFR 110.7).	Arkansas	1,494	36,722.52
hese special perty expenditures count neither as contribu-	California	15.627	384,111,66
ions to the candidate not as expenditures by the candidate	Colorado	1,828	44,932.24
or the candidate's authorized committees. The expenditures	Connecticut	2,238	55,010.04
nust, however, be reported by the party committee on	Delaware"	407	24,580.00
chedule F, FEC Form 3, revised January 1978.	Florida	6,219	152,863.02
	Georgia	3,450	84,801.00
	Hawaii	615	24,580.00
And a second second second second second second second second second second second second second second second	Idaho	574	24,580.00
ational political party committees have separate expendi-	Illinois	7,873	193 518 34
are limits for Senate and House candidates in the general			
ection.	Indiana	3,690	90,700.20
**	lowa	2,025	49,774.50
tate political party committees are entitled to separate	Kansas	1,664	40,901.12
apenditure limits for Senate and House general election	Kentucky	2,402	59,041.16
andidates in their State. Within a State, all expenditures	Louisiana	2,609	64,129.22
hade on behalf of one candidate by the State party com-	Maine	756	24,580.00
nittee or any subordinate party committee (e.g., county,	Maryland	2,921	71,798.18
listrict, local) are subject to one expenditure limit.	Massachusetts	4,166	102,400,28
and the second and the second s	Michigan	6,284	154,460.72
The formulas for the party spending limits in 1978 are	Minnesota	2,765	67,963.70
used on State voting age population estimates (as of July	Mississippi	1,575	38,713.50
1977) from the Department of Commerce, and the Con-	Missouri	3,417	83,989.86
umer Price Index increase certified by the Secretary of	Montana	523	24,580.00
abor. They are calculated as follows:	Nebraska	1,095	26,915.10
abor, they are calculated as forlows.	Nevada"	439	24,580.00
<ul> <li>A second sec second second sec</li></ul>	New Hampshire		24,580.00
ienatorial:	New Jersey	5,224	128,405.92
State Voting Age Population (VAP) x 50.02, plus the	New Mexico	783	24,580.00
1978 increase in the Consumer Price Index (CPI) of	New York	12,879	316,565.82
22.9 percent; or \$24,580.00, whichever is greater.	North Carolina	3,864	94,977.12
(See chart below.)	North Dakota"	450	24,580.00
	Ohio	7,484	183,956.72
Congressional :	Charles and the second second	1,994	49.012.52
1) \$12,290.00, for House candidates in States with more	Oklahoma	1.695	41,663.10
than one district (and candidates for Delegate from	Oregon	8,508	209,126.64
the District of Columbia, Guam and the Virgin	Pennsylvania		24,580.00
Islands; or for Resident Commissioner from Puerto	Rhode Island	673	
Rico); or	South Carolina	1,953	48.004.74
2) The Senate limit for the State, for House candidates	South Dakota	475	24,580.00
in States with only one district. (See chart below.)	Tennessee	3,028	74,428.24
	Texas	8,773	215,640.34
	Utah	797	24,580.00
	Vermont*	336	24,580.00
24-2 A 101 A 101 A 101 A 101 A 101 A 101 A 101 A 101 A 101 A 101 A 101 A 101 A 101 A 101 A 101 A 101 A 101 A 1	Virginia	3,631	89,249.98
PARTY SPENDING LIMITS	Washington	2,589	63,637.62
FOR SENATE CANDIDATES	West Virginia	1,313	32,273.54
The Commission has compiled the following chart for	Wisconsin	3,244	79,737.52
1978 limits on party spending for Senate candidates in the	Wyoming	278	24,580.00
general election. In the chart, an asterisk (*) indicates those	area and	· · · · · · · · · · · · · · · · · · ·	
States having only one Representative. In these instances,	District of	1. S. C. C.	
atates naving only one neurosentative. In unse instances,	Columbia	505	12,290.00
the Senate limit applies for these candidates instead of the	Guam	49	12,290.00
House limitation. This exception does not apply to candi-	Puerto Rico	2.010	12,290.00
dates for Delegate (District of Columbia, Guam, Virgin Islands) or Resident Commissioner (Puerto Rico).	Virgin Islands	59	12,290.00

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## APPENDIX B

REPORT OF RECEIPTS AND EXPERIDITURES ----FOR A CANCIDATE OR COMMITTEE ----SUPPORTING CANDIDATES) FOR 11 31 ----21 NOMINATION OR ELECTION TO FEDERAL OFFICE ----------13 2 59 Stand Bushing France Martin 1975 (Excess for Candidates or Com Comments and their used by a cardidate be needed and an extension of cards an in respect to each electron a sead of National Republican Senatorial 5 323 . Committee-Contributions 2 10 No 000091009 Name at Candidate or Committee I.n full 227 Massachusetts Ave., N. E. Address inumber and street) Offer Sought, State Dures I.I applicates Washington, D. C. 20002 Dorech if address is different than previously reported City, State and ZiP Coor Ver of Elector . 4 Type of Report Icheck appropriate bones? Tanth day report pres Auro 10 Gasterty Report -----Termination Report Ju's 10 Casterts Report D Amendmant tor en the State of ... B October 10 Cuarteria Report Thursday day report for Innet report D #\*\*\*\* 31 4\*\*\*\*\* Report Brithary annarat or conventions t O Monthing Report ... m me State of image and (date) D M. .... Ext.or Games Line or D Primary and General O Gree toor a tata". ett : 3 That a report fo SUMMARY OF RECEIPTS AND EXPENDITURES (Figures may be rounded to nearost deliar.) -Column A Column B 5 Corning Pariod July 1 \_ Through September 30, 1978 C ... ~ Can or hand among 1 19 -0-1 5 7 Can ar \*\*\*\* at bea \*\*\*\*\* at \* \$ 970,588.96 8 Tuta ret + uts \*\*\*\* \*\*\* 19 \$ 1,641,974.14 \$ 3,412,563.10 Las Suprate Aas and I and B tor Corumn & and make and B tor Corum B. \$ 2,612,563.10 . \$ 3,412,563.10 9 Tuta expetition from the 25 \$ 1,200,000.00 \$ 2,000,000,00 \$ 1,412,563.10 \$ 1,412,563.10 IT sear of contributed terms on tand to be audited 12 Crists and oblight one owed to the Committee Candidate I fam ite all on Schedule C \$ 147,150.00. 13 John er J. to set ons swed to the Committee Card date I tem re al or Setenute Ci I certify that I have examined this Report and to the pest of my knowledge and perief it is true, correct and complete Koundy I Small Oct. 10, 1978 Rodney A. Smith, Treasurer (Date' IT-ded have of Treasurer or Candidatel Submission of faire erromeous, or incomplete information may subject the person signing this Report to the person set 20 SC Section 4372. o' Sect on 431, see reverse side of form! Federal Lection Communes Acurcus S. CAD 8 187620 - ROSOLI 8 187620 - ROSOLI 8 187620 - ROSOLI er car. 800-424 9510 1325 K Street, N W Walk-rates, D C 20463 3 All previous versions of FEC FORM 3 are obsolete and should no tonger be used. formation reported herein may not be copied for sale or use by any person for purposes of policiting controls

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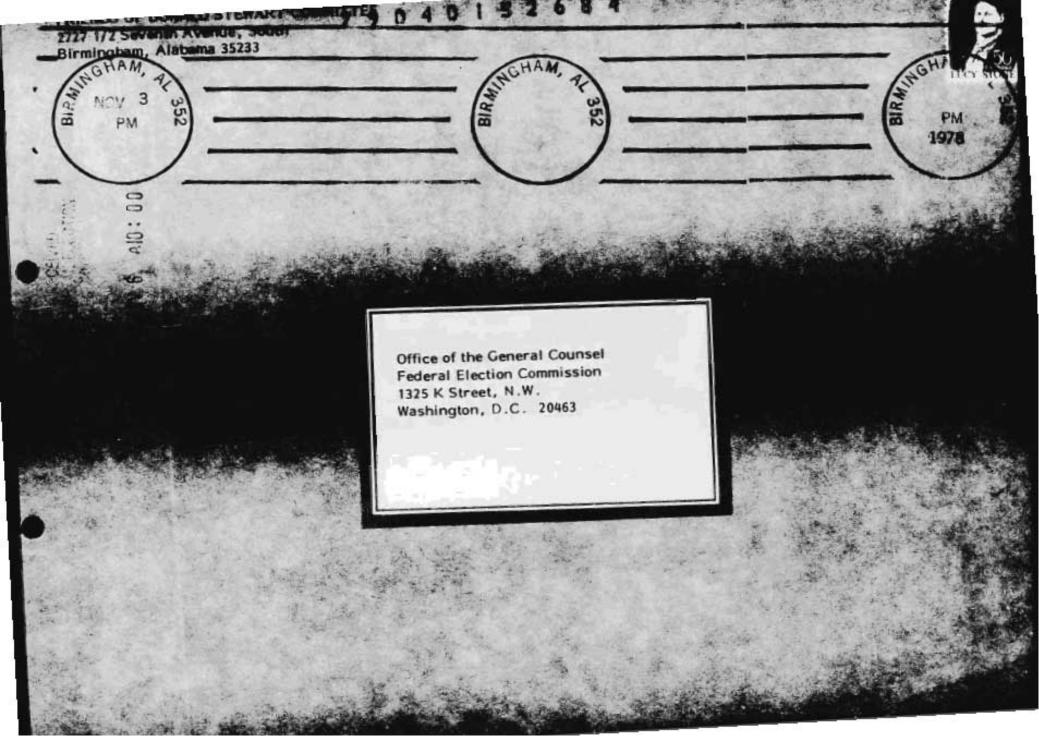
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## FLDERAL ELECTION COMMISSION

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

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