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# FEDERAL ELECTION COMMISSION

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# FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 26, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. J. Curtis Herge, Esquire Sedam and Herge 7600 Old Springhouse Road McLean, VA 22102

RE: MUR 1294

Dear Mr. Herge:

On June 26 , 1981, the Commission accepted the conciliation agreement signed by Ms. Lisa Stolenberg and a civil penalty in settlement of violations of 2 U.S.C. §§ 434(b)(1), 434(b)(3)(A) and 434(b)(8), provisions of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter and will become part of the public record within thirty days.

We remind you that 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should your client wish any such information to become part of the public record, please advise us in writing.

Enclosed you will find a fully executed copy of the final conciliation agreement for your files.

Sincerely

Charles N. Steel

General Counsel

Enclosure Conciliation Agreement CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. J. Curtis Herge, Esquire
Sedam and Herge
7600 Old Springhouse Road
McLean, VA 22102

Dear Mr. Herge:

On , 1981, the

days.

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Enclosed you will find a fully executed copy of the final conciliation agreement for your files.

Sincerely,

RE:

MUR 1294

Charles M. Steele General Counsel

Enclosume Conciliation Agreement

- DAK 6/30/81

In the Matter of	)		
	)		
National Conservative	)	MUR 1294 (80	))
Political Action	)		
Committee	)		

### CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission (hereinafter "the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities, and after having found probable cause to believe the National Conservative Political Action Committee ("Respondent" or "the Committee") violated:

- 2 U.S.C. § 434(b)(3)(A) by failing to disclose the identification of persons whose contributions to the Committee exceeded an aggregate of \$200 within the calendar year;
- 2. 2 U.S.C. § 434(b)(8) by failing to disclose the circumstances and conditions under which debts were extinguished for less than their reported amounts; and
- 3. 2 U.S.C. § 434(b)(1) by failing to properly disclose the amount of cash on hand for calendar years 1979 and 1980.

O

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

- I. The Commission has jurisdiction over the Respondent and the subject matter of this proceeding.
- II. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

- III. Respondent enters voluntarily into this Agreement with the Commission.
  - IV. The pertinent facts in this matter are as follows:
    - 1. Respondent, National Conservative Political Action Committee, is a political committee within the meaning of 2 U.S.C. § 431(4)(1).
    - 2. For the reporting periods covering August 1, 1979 through June 30, 1980, Respondent failed to timely disclose the identification of individuals whose contributions to the Committee aggregated in excess of \$200 within the calendar year. In August and September of 1980, Respondent filed amended reports to disclose all previously unitemized or unreported contributions.
    - 3. For the reporting periods covering March 1, 1980 through June 30, 1980, Respondent failed to provide a statement as to the circumstances and conditions under which debts were extinguished at \$31,760 less than their reported amount. Respondent subsequently filed amendments to its reports covering March 1 through June 30, 1980 and clarified the reporting discrepancies noted with respect to outstanding debts.
    - 4. For the reporting periods covering July 1979 through January 1981, Respondent failed to

to properly report cash on hand. Respondent subsequently filed amendments to its reports and reconciled its cash on hand discrepancies.

## WHEREFORE, Respondent agrees:

- A. That the Committee violated 2 U.S.C. § 434(b)(3)(A) by failing to timely disclose the identification of individuals whose contributions to the Committee aggregated in excess of \$200 within the calendar year.
- B. That the Committee violated 2 U.S.C. § 434(b)(8) by failing to disclose the circumstances and conditions under which debts were extinguished for less than their reported amounts.
- C. That the Committee violated 2 U.S.C. § 434(b)(1) by failing to properly disclose cash on hand.
- D. That Respondent will pay a civil penalty in the amount of Three Thousand Dollars (\$3,000) pursuant to 2 U.S.C. § 437g(a)(5)(A).
- E. That Respondent shall not undertake any activity which is in violation of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431, et seq.

#### GENERAL CONDITIONS

V. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning

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

- This agreement shall become effective as of the date VI. that all parties hereto have executed same and the Commission has approved the entire agreement.
- VII. Respondent shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

Charles 1 / Steele General Counsel

June 16, 1981

Date

Political Action Committee

LISA STOLTENBERG BY: Treasurer ITS:

June 23, 1981

MEMORANDUM TO: Marjorie W. Emmons

FROM: Phyllis A. Kayson

SUBJECT: MUR 1294

Please have the ataached Memo to the Commission distributed to the Commission on a 48 hour tally basis. Thank you.

Attachment

cc: Kramer

### BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of ) ) MUR 1294
National Conservative Political )
Action Committee )

### CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on June 26, 1981, the Commission decided by a vote of 6-0 to take the following actions regarding MUR 1294:

- Accept the conciliation agreement in MUR 1294 as submitted with the General Counsel's June 23, 1981 memorandum.
- 2. Close the file in this matter.

Commissioners Aikens, Harris, McGarry, Reiche, Thomson and Tiernan voted affirmatively in this matter.

Attest:

Date

1 :0

Marjorie W. Emmons
Secretary for the Commission

Received in Office of the Commission Secretary: 6-23-81, 2:30 Circulated on 48 hour vote basis: 6-24-81, 11:00

# SENSITIVE





# FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

81 JUN 23 P 2: 30

June 23, 1981

### MEMORANDUM

TO:

The Commission

FROM:

Charles N. Steele

SUBJECT:

MUR 1294 (80)

Conciliation Agreement

Attached is a conciliation agreement which has been signed by Lisa Stolenberg, treasurer of respondent National Conservative Political Action Committee.

The attached agreement includes all of the provisions which were previously approved by the Commission. In addition, a check for the civil penalty imposed by the Commission has been received.

The Office of General Counsel recommends that the Commission accept this agreement and close the file in this matter.

### Recommendation

- 1. Accept the attached conciliation agreement in MUR 1294.
- 2. Close the file in this matter.
- 3. Approve the attached letter to Mr. J. Curtis Herge, attorney for respondent National Conservative Political Action Committee.

#### Attachments

Conciliation Agreement (1)
Photocopy of civil penalty check
Letter to Mr. J. Curtis Herge

SEDAM & HERGE A PROFESSIONAL CORPORATION ATTORNEYS AT LAW 7600 OLD SPRINGHOUSE ROAD McLEAN, VIRGINIA 22102 GLENN J. SEDAM, JR. (703) 821-1000 1700 PENNSYLVANIA AVENUE, N.W. J. CURTIS HERGE WASHINGTON, D.C. 20006 (202) 393-7124 ROBERT R. SPARKS, JR. June 17, 1981 TWX/TELEX: 710-831-0896 MICHAEL D. HUGHES A. MARK CHRISTOPHER CABLE: SEDAMHERGE KAREN LUSSEN BLAIR JOHN ROBERT CLARK III Kenneth A. Gross, Esq. Associate General Counsel Federal Election Commission 1325 K Street, N.W. Washington, D.C. 20463 Attention: Beverly Kramer, Esq. Office of General Counsel Re: MUR 1294 Dear Mr. Gross: With reference to your letter, dated June 12, 1981, regarding the disposition of the above-captioned matter, there is enclosed herewith one copy of the Conciliation Agreement, which has been executed on behalf of National Conservative Political Action Committee; and, a check drawn to the order of U.S. Treasurer in the amount of \$3,000.00, in payment of the assessed civil penalty. Sincerel Curtis Herge enclosures  $\mathcal{S}$ တ CONTRACTOR STORY

#### CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission (hereinafter "the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities, and after having found probable cause to believe the National Conservative Political Action Committee ("Respondent" or "the Committee") violated:

- 2 U.S.C. § 434(b)(3)(A) by failing to disclose the identification of persons whose contributions to the Committee exceeded an aggregate of \$200 within the calendar year;
- 2. 2 U.S.C. § 434(b)(8) by failing to disclose the circumstances and conditions under which debts were extinguished for less than their reported amounts; and
- 3. 2 U.S.C. § 434(b)(1) by failing to properly disclose the amount of cash on hand for calendar years 1979 and 1980.

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

- I. The Commission has jurisdiction over the Respondent and the subject matter of this proceeding.
- II. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

- III. Respondent enters voluntarily into this Agreement with the Commission.
- IV. The pertinent facts in this matter are as follows:
  - 1. Respondent, National Conservative Political Action Committee, is a political committee
  - .. within the meaning of 2 U.S.C. § 431(4)(1).
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C

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- 3 -

to properly report cash on hand. Respondent subsequently filed amendments to its reports and reconciled its cash on hand discrepancies.

### WHEREFORE, Respondent agrees:

- A. That the Committee violated 2 U.S.C. § 434(b)(3)(A) by failing to timely disclose the identification of individuals whose contributions to the Committee aggregated in excess of \$200 within the calendar year.
- B. That the Committee violated 2 U.S.C. § 434(b)(8) by failing to disclose the circumstances and conditions under which debts were extinguished for less than their reported amounts.
- C. That the Committee violated 2 U.S.C. § 434(b)(1) by failing to properly disclose cash on hand.
- D. That Respondent will pay a civil penalty in the amount of Three Thousand Pollars (\$3,000) pursuant to 2 U.S.C. § 437g(a)(5)(A).
- E. That Respondent shall not undertake any activity which is in violation of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431, et seq.

### GENERAL CONDITIONS

V. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning

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

- VI. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.
- VII. Respondent shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

Date

Charles N. Steele General Counsel

June 16, 1981

C

National Conservative

Pălitical Action Committee

BY:

LISA STOLTENBERG

ITS:

Treasurer

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# CERTIFIED MAIL RETURN RECEIPT REQUESTED

Mr. J. Curtis Herge, Esquire Sedam and Herge 7600 Old Springhouse Road McLean, VA 22102

RE: MUR 1294

Dear Mr. Herge:

On , 1981, the Commission accepted the conciliation agreement signed by Ms. Lisa Stolenberg and a civil penalty in settlement of violations of 2 U.S.C. §§ 434(b)(1), 434(b)(3)(A) and 434(b)(8), provisions of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter and will become part of the public record within thirty days.

We remind you that 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should your client wish any such information to become part of the public record, please advise us in writing.

Enclosed you will find a fully executed copy of the final conciliation agreement for your files.

Sincerely,

Charles N. Steele General Counsel

Enclosure
Conciliation Agreement

GCC 4908 10086 -ATTORNEYS AT LAW McLEAN, VIRGINIA 22102 1700 PENNSYLVANIA AVENUE, N.W. WASHINGTON, D.C. 20006 (202) 393-7124 TWX/TELEX: 710-831-0896 CABLE: SEDAMHERGE

SEDAM & HERGE

A PROFESSIONAL CORPORATION

7600 OLD SPRINGHOUSE ROAD

(703) 821-1000

June 17, 1981

Kenneth A. Gross, Esq. Associate General Counsel Federal Election Commission 1325 K Street, N.W. Washington, D.C. 20463

Attention:

GLENN J. SEDAM, JR.

MICHAEL D. HUGHES A. MARK CHRISTOPHER

KAREN LUSSEN BLAIR JOHN ROBERT CLARK III

ROBERT R. SPARKS, JR.

J. CURTIS HERGE

Beverly Kramer, Esq.

Office of General Counsel

Re: MUR 1294

Dear Mr. Gross:

With reference to your letter, dated June 12, 1981, regarding the disposition of the above-captioned matter, there is enclosed herewith one copy of the Conciliation Agreement, which has been executed on behalf of National Conservative Political Action Committee; and, a check drawn to the order of U.S. Treasurer in the amount of \$3,000.00, in payment of the assessed civil penalty.

Sincerely.

enclosures

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### SEDAM & HERGE

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

7600 OLD SPRINGHOUSE ROAD

McLEAN, VIRGINIA 22102

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Kenneth A. Gross, Esq. Associate General Counsel Federal Election Commission 1325 K Street, N.W. Washington, D.C. 20463

NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE OPERATING ACCOUNT

1500 WILSON BLVD., NO. 513 ARLINGTON, VIRGINIA 22200

June 16, 19, 81

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U.S. Treasurer

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### FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 24, 1981

# CERTIFIED MAIL RETURN RECEIPT REQUESTED

J. Curtis Herge, Esquire Sedam and Herge 7600 Old Springhouse Road McLean, VA 22102

RE: MUR 1294 (80)

Dear Mr. Herge:

On April 21, 1981, the Commission determined there is probable cause to believe that your client, the National Conservative Political Action Committee, violated sections 434(b)(3)(A), 434(b)(8) and 434(b)(1) of the Federal Election Campaign Act of 1971, as amended ("the Act").

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

Enclosed is 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 the enclosed agreement, please sign and return it along with the civil penalty to the Commission within ten days. We will then recommend that the Commission approve this agreement. Please make your check for the civil penalty payable to the U.S. Treasurer.

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

Sincere

Charles N. Steele General Counsel

Enclosure Conciliation Agreement

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MUR 1294 OGC B. Kramer



### FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

# CERTIFIED MAIL RETURN RECEIPT REQUESTED

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

Sincerely,

Charles N. Steele General Counsel

Enclosure Conciliation Agreement

Typed and prepared by Beverly Kramer

BBK 4/23/81

### BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)			
National Conservative	)	MUR 12	94	(80)
Political Action Committee	)			
(NCPAC)	)			

### CERTIFICATION

- I, Lena L. Stafford, Recording Secretary for the Federal Election Commission's Executive Session on April 21, 1981, do hereby certify that the Commission decided by votes of 5-0 to take the following actions in MUR 1294:
  - 1. Find probable cause to believe that the National Conservative Political Action Committee violated 2 U.S.C. § 434(b)(3)(A) by failing to disclose the identification of persons whose contributions to the Committee aggregated in excess of \$200 within the calendar year.
  - 2. Find probable cause to believe that the National Conservative Political Action Committee violated 2 U.S.C. § 434(b)(8) by failing to disclose the circumstances and conditions under which debts were extinguished for less than their reported amounts.
  - 3. Find probable cause to believe that the National Conservative Political Action Committee violated 2 U.S.C. § 434(b)(1) by failing to properly disclose the amount of cash on hand for calendar years 1979 and 1980.
  - Approve and send the letter and conciliation agreement attached to the General Counsel's Report dated April 9, 1981,

to Mr. J. Curtis Herge, counsel for the National Conservative Political Action Committee.

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

Attest:

4-23-81 Date Level L. Staffel
Recording Secretary

#### BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)		
	)		
National Conservative	)	MUR 1294	(80)
Political Action Committee	)		
(NCPAC)	)		

#### GENERAL COUNSEL'S REPORT

# I. Background

Based on information ascertained during the review of reports and statements filed by the National Conservative Politial Action Committee ("the Committee"), the Commission, on October 15, 1980, found reason to believe the Committee violated certain provisions of the Federal Election Campaign Act of 1971, as amended (the "Act"). Specifically, the Commission found reason to believe that the Committee violated:

- (1) 2 U.S.C. § 434(b)(3)(A) by failing to disclose the identification of persons whose contributions to the Committee exceeded an aggregate of \$200 within the calendar year;
- (2) 2 U.S.C. § 434(b)(8) by failing to disclose the circumstances and conditions under which debts were extinguished for less than their reported amounts; and
- (3) 2 U.S.C. § 434(b)(1) by failing to properly disclose the amount of cash on hand for the calendar years 1979 and 1980.

- 2 -On November 3, 1980, Mr. J. Curtis Herge, counsel for the National Conservative Political Action Committee, responded to the Commission's notification of findings in this matter. The response from Mr. Herge admitted to the findings of fact but called to the Commission's attention various mitigating factors surrounding the violations. On February 18, 1981, the Office of General Counsel notified the Committee that it was prepared to recommend that the Commission proceed to a finding of probable cause to believe violations of the Act had occurred. Attached to this notification was the General Counsel's Brief stating the position of the General Counsel on the legal and factual issues of the case. See Brief of OGC. On March 5, 1981, Mr. J. Curtis Herge submitted a reply to the brief of the General Counsel. See Attachment #1. -Legal Analysis II. 0 Legal analysis is included in the First General Counsel Report of October 2, 1980 and the General Counsel's Brief of February 18, 1981. In response to the General Counsel's brief, Mr. Herge has indicated that with respect to alleged violations of 2 U.S.C. §§ 434(b)(3)(A) and 434(b)(8) "the Office of General Counsel has placed before the Commission a fair and accurate statement of the facts." However, with respect to all matters at issue in this case, Mr. Herge calls the attention of the Commission to various mitigating factors which surround

the violations. The factors have been presented in the General Counsel's brief of February 18, 1981. With regard to the alleged violation of 2 U.S.C. § 434(b)(1) for failure to properly disclose cash on hand, Mr. Herge again admits the findings of fact. However, he calls to the Commission's attention the fact that the Committee has placed upon the record amended reports which reconcile cash discrepancies noted on the original reports filed for calendar years 1979 and 1980. In order to accomplish the reconciliation of cash balances, Mr. Herge notes that the Committee engaged additional staff in 1980 to perform a detailed analysis of the Committee's financial records which include \$5,338,962 in contributions and \$5,240,925 in disbursements. Upon the request of this office, the Reports Analysis Division has conducted a review of the referenced amendments to ensure compliance with 2 U.S.C. § 434(b)(1). Based on their review, the Reports Analysis Division concludes that the Committee has substantially complied with 2 U.S.C. § 434(b)(1) with only a small discrepancy of \$81 appearing upon the record. Based upon the foregoing, the Office of General Counsel recommends that the Commission find probable cause to believe the National Conservative Political Committee violated 2 U.S.C. §§ 434(b)(3)(A), 434(b)(8), 434(b)(1) and consider the mitigating factors set forth in the record in attempting to reach a resolution of this matter.

# III. Discussion of Conciliation and Civil Penalty

Attached for the Commission's approval is a conciliation agreement to be offered to the Committee in settlement of this matter.

### IV. Recommendations

- 1. Find probable cause to believe that the National Conservative Political Action Committee violated 2 U.S.C. § 434(b)(3)(A) by failing to disclose the identification of persons whose contributions to the Committee aggregated in excess of \$200 within the calendar year.
- 2. Find probable cause to believe that the National Conservative Political Action Committee violated 2 U.S.C. § 434(b)(8) by failing to disclose the circumstances and conditions under which debts were extinguished for less than their reported amounts.
- 3. Find probable cause to believe that the National Conservative Political Action Committee violated 2 U.S.C. § 434(b)(1) by failing to properly disclose the amount of cash on hand for calendar years 1979 and 1980.

4. Approve and send the attached letter and conciliation agreement to Mr. J. Curtis Herge, counsel for the National Conservative Political Action Committee.

april 9,1981

Charles N. Steele

Attachments

Reply to OGC Brief Letter/Conciliation Agreement

(Note: Incorporated by reference to this report is the

(First General Counsel's Report of October 2, 1980)

(and the General Counsel's Brief of February 18,

(1981; copies of which have previously been

(circulated to the Commission. Due to their

(volume, these documents have not been attached

to this report.

210 1 SEDAM & HERGE A PROFESSIONAL CORPORATION ATTORNEYS AT LAW 7600 OLD SPRINGHOUSE ROAD McLEAN, VIRGINIA 22102 GLENN J. SEDAM, JR. (703) 821-1000 1700 PENNSYLVANIA AVENUE, N.W. J. CURTIS HERGE WASHINGTON, D.C. 20006 (202) 393-7124 ROBERT R. SPARKS, JR. March 5, 1981 TWX/TELEX: 710-831-0896 MICHAEL D. HUGHES A. MARK CHRISTOPHER CABLE: SEDAMHERGE KAREN LUSSEN BLAIR JOHN ROBERT CLARK III J STANLEY PAYNE, JR. Federal Election Commission 1325 K Street, N.W. Washington, D.C. 20463 Attention: Secretary of the Commission Re: MUR 1294 Dear Members of the Commission: This letter is submitted to you on behalf of our client, National Conservative Political Action Committee (NCPAC), in connection with the finding by the Federal Election Commission, on October 15, 1980, of reason to believe that NCPAC violated sections 434(b)(3)(A), 434(b)(1) and 434(b)(8) of the Federal Election Campaign Act of 1971, as amended. We have been advised that the Office of General Counsel is prepared to recommend that the Commission find probable cause to believe that a violation has occurred. Before proceeding to a vote on this matter, we request that the Commission consider the following: Alleged Violation of 2 U.S.C. 434(b)(3)(A) The Office of General Counsel has placed before the Commission, in its brief, a fair and accurate summary of the facts on this matter, including the fact that the requisite delinquent contributor data was promptly filed by NCPAC to the satisfaction of the Reports Analysis Division. In addition, the Office of General Counsel has recommended to the Commission that it consider the mitigating factors set forth in the record in attempting to reach a resolution of this matter. (B) Alleged Violation of 2 U.S.C. 434(b)(8) Again, with respect to this allegation, the Office of General Counsel has placed before the Commission a fair and accurate statement of the facts. We also call

Federal Election Commission Page Two March 5, 1981

C

the attention of the Commission to the finding by the Office of General Counsel that NCPAC promptly filed requisite amendments, revealing to the apparent satisfaction of the Reports Analysis Division that all debts were extinguished for the same dollar amounts as originally reported. The Office of General Counsel has also recommended that the Commission consider the mitigating factors set forth in the record.

# (C) Alleged Violation of 2 U.S.C. 434(b)(1)

With respect to this matter, we wish to call the attention of the Commission to the fact that the reconciliation of cash balances necessitated a detailed analysis of the financial records of NCPAC for the entire year and the preparation of amended monthly reports for the entire year. In order to accomplish that goal as promptly as possible, NCPAC engaged additional staff in November, 1980 to analyze its receipt and disbursement journals, conduct bank reconciliations and match the results against the respective monthly reports. Amended reports, reconciling the cash balances, were then prepared and filed, as follows:

Monthly Report	Amendment Filed On or About
	November 20, 1980 December 16, 1980 December 18, 1980 January 2, 1981 January 9, 1981 January 16, 1981 February 4, 1981 February 17, 1981 February 12, 1981 February 13, 1981 March 2, 1981
Year-End	March 2, 1981

In light of the financial activity of NCPAC during 1980, \$5,338,962 in contributions and \$5,240,925 in disbursements, we request that the Commission consider the magnitude of the task which was accomplished in a relatively brief period of time.

Federal Election Commission Page Three March 5, 1981

### (D) Conclusion

In conclusion, it is respectfully requested that the Commission give due consideration to the mitigating factors involved in this matter. During the course of 1980, NCPAC was faced with an unanticipated increase in activity which overburdened its compliance personnel and support systems. Immediate steps were taken to correct the deficiencies and file amended reports. Furthermore, NCPAC has now engaged an experienced accountant, in the capacity of Assistant Office Manager, who will work closely with its bookkeeping department on a full-time basis to prevent a recurrence of the type of problems originally called to the attention of the Commission.

Sincerely yours,

J. Curtis Herge

Counsel to National Conservative Political Action Committee

cc: Office of General Counsel



### FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

# CERTIFIED MAIL RETURN RECEIPT REQUESTED

J. Curtis Herge, Esquire Sedam and Herge 7600 Old Springhouse Road McLean, VA 22102

RE: MUR 1294 (80)

Dear Mr. Herge:

On , 1981, the Commission determined there is probable cause to believe that your client, the National Conservative Political Action Committee, violated sections 434(b)(3)(A), 434(b)(8) and 434(b)(1) of the Federal Election Campaign Act of 1971, as amended ("the Act").

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

Enclosed is 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 the enclosed agreement, please sign and return it along with the civil penalty to the Commission within ten days. We will then recommend that the Commission approve this agreement. Please make your check for the civil penalty payable to the U.S. Treasury.

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

Sincerely,

Charles N. Steele General Counsel

Enclosure Conciliation Agreement



### FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE

FROM:

MARJORIE W. EMMONS/MARGARET CHANEY

OFFICE OF THE SECRETARY TO THE COMMISSION

DATE:

£ ...

MARCH 13, 1981

SUBJECT:

MUR 1294 - Interim Investigative Report #2, dated 3-10-81; Signed 3-11-81; Received

in OCS 3-11-81, 4:59

The above-named document was circulated to the

Commission on a no-objection basis at 11:00, March 12, 1981.

There were no objections to the Interim Investigative Report at the time of the deadline.

March 11, 1981

MEMORANDUM TO: Marjorie W. Emmons

FROM:

Elissa T. Garr

SUBJECT:

MUR 1294

Please have the attached Interim Invest Report distributed to the Commission. Thank you.

# BEFORE THE FEDERAL ELECTION COMMISSION March 10, 1981

#### INTERIM INVESTIGATIVE REPORT #2

On October 15, 1980, the Commission found reason to believe that the National Conservative Political Action Committee ("NCPAC") violated sections 434(b)(3)(A), 434(b)(1) and 434(b)(8) of the Federal Election Campaign Act of 1971, as amended ("the Act").

On February 18, 1981, the Office of General Counsel notified NCPAC that this office was prepared to recommend that the Commission find probable cause to believe that a violation of the Act had occurred. By letter dated March 5, 1981, Mr. J. Curtis Herge, counsel representing the respondent in this matter, replied to the brief of the General Counsel. With respect to an alleged violation of 2 U.S.C. § 434(b)(1) for failure to properly disclose cash on hand, Mr. Herge calls to the Commission's attention various measures taken by NCPAC to reconcile its cash balances, including the filing of amended reports.

We have requested members of the Reports Analysis Division to review all amended reports filed by NCPAC in order to determine whether the requisite amendments satisfy the requirements of 2 U.S.C. § 434(b)(1).

Upon receipt of the analysts' determination in this matter, the Office of General Counsel will prepare its final report to the Commission.

11 Mind (4K)

Charles N. Steele General Counsel

GONH 4/10 7 SEDAM & HERGE A PROFESSIONAL CORPORATION ATTORNEYS AT LAW 7600 OLD SPRINGHOUSE ROAD McLEAN, VIRGINIA 22102 (703) B21-1000 1700 PENNSYLVANIA AVENUE, N.W. GLENN J. SEDAM. JR. WASHINGTON, D.C. 20006 J. CURTIS HERGE (202) 393-7124 March 5, 1981 ROBERT R. SPARKS, JR. TWX/TELEX: 710-831-0896 MICHAEL D. HUGHES A. MARK CHRISTOPHER CABLE SEDAMHERGE KAREN LUSSEN BLAIR JOHN ROBERT CLARK III J STANLEY PAYNE, JR. Federal Election Commission 1325 K Street, N.W. Washington, D.C. 20463 Attention: Secretary of the Commission MUR 1294 Re: Dear Members of the Commission: This letter is submitted to you on behalf of our client, National Conservative Political Action Committee (NCPAC), in connection with the finding by the Federal Election Commission, on October 15, 1980, of reason to believe that NCPAC violated sections 434(b)(3)(A), 434(b)(1) and 434(b)(8) of the Federal Election Campaign Act of 1971, as amended. We have been advised that the Office of General Counsel is prepared to recommend that the Commission find probable cause to believe that a violation has occurred. Before proceeding to a vote on this matter, we request that the Commission consider the following: (A) Alleged Violation of 2 U.S.C. 434(b)(3)(A) The Office of General Counsel has placed before the Commission, in its brief, a fair and accurate summary of the facts on this matter, including the fact that the requisite delinquent contributor data was promptly filed by NCPAC to the satisfaction of the Reports Analysis Division. In addition, the Office of General Counsel has recommended to the Commission that it consider the mitigating factors set forth in the record in attempting to reach a resolution of this matter. Alleged Violation of 2 U.S.C. 434(b)(8) (B) Again, with respect to this allegation, the Office of General Counsel has placed before the Commission a fair and accurate statement of the facts. We also call

Federal Election Commission Page Two March 5, 1981

the attention of the Commission to the finding by the Office of General Counsel that NCPAC promptly filed requisite amendments, revealing to the apparent satisfaction of the Reports Analysis Division that all debts were extinguished for the same dollar amounts as originally reported. The Office of General Counsel has also recommended that the Commission consider the mitigating factors set forth in the record.

## (C) Alleged Violation of 2 U.S.C. 434(b)(1)

With respect to this matter, we wish to call the attention of the Commission to the fact that the reconciliation of cash balances necessitated a detailed analysis of the financial records of NCPAC for the entire year and the preparation of amended monthly reports for the entire year. In order to accomplish that goal as promptly as possible, NCPAC engaged additional staff in November, 1980 to analyze its receipt and disbursement journals, conduct bank reconciliations and match the results against the respective monthly reports. Amended reports, reconciling the cash balances, were then prepared and filed, as follows:

Monthly Report	Amendment Filed On or About
September, 1980 October, 1980	November 20, 1980 December 16, 1980 December 18, 1980 January 2, 1981 January 9, 1981 January 16, 1981 February 4, 1981 February 17, 1981 February 12, 1981 February 13, 1981 March 2, 1981 March 2, 1981
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In light of the financial activity of NCPAC during 1980, \$5,338,962 in contributions and \$5,240,925 in disbursements, we request that the Commission consider the magnitude of the task which was accomplished in a relatively brief period of time.

Federal Election Commission Page Three March 5, 1981

#### (D) Conclusion

In conclusion, it is respectfully requested that the Commission give due consideration to the mitigating factors involved in this matter. During the course of 1980, NCPAC was faced with an unanticipated increase in activity which overburdened its compliance personnel and support systems. Immediate steps were taken to correct the deficiencies and file amended reports. Furthermore, NCPAC has now engaged an experienced accountant, in the capacity of Assistant Office Manager, who will work closely with its bookkeeping department on a full-time basis to prevent a recurrence of the type of problems originally called to the attention of the Commission.

Sincerely yours,

J. Curtis Herge

Counsel to National Conservative

Political Action Committee

cc: Office of General Counsel

Sedam & Herge A PROFESSIONAL CORPORATION ATTORNEYS AT LAW 7600 OLD SPRINGHOUSE ROAD Mc LEAN, VIRGINIA 22102 (703) 821-1000 1700 PENNSYLVANIA AVENUE, N.W. GLENN J. SEDAM, JR. J. CURTIS HERGE WASHINGTON, D.C. 20006 (202) 393-7124 March 5, 1981 ROBERT R. SPARKS, JR. TWX/TELEX: 710-831-0896 MICHAEL D. HUGHES A. MARK CHRISTOPHER CABLE. SEDAMHERGE KAREN LUSSEN BLAIR JOHN ROBERT CLARK III J STANLEY PAYNE, JR. Federal Election Commission 1325 K Street, N.W. Washington, D.C. 20463 Attention: Secretary of the Commission MUR 1294 Re: Dear Members of the Commission: This letter is submitted to you on behalf of our client, National Conservative Political Action Committee (NCPAC), in connection with the finding by the Federal Election Commission, on October 15, 1980, of reason to believe that NCPAC violated sections 434(b)(3)(A), 434(b)(1) and 434(b)(8) of the Federal Election Campaign Act of 1971, as amended. We have been advised that the Office of General Counsel is prepared to recommend that the Commission find probable cause to believe that a violation has occurred. Before proceeding to a vote on this matter, we request that the Commission consider the following: ~ (A) Alleged Violation of 2 U.S.C. 434(b)(3)(A) The Office of General Counsel has placed before the Commission, in its brief, a fair and accurate summary of the facts on this matter, including the fact that the requisite delinquent contributor data was promptly filed by NCPAC to the satisfaction of the Reports Analysis Division. In addition, the Office of General Counsel has recommended to the Commission that it consider the mitigating factors set forth in the record in attempting to reach a resolution of this matter. Alleged Violation of 2 U.S.C. 434(b)(8) (B) Again, with respect to this allegation, the Office of General Counsel has placed before the Commission a fair and accurate statement of the facts. We also call

Federal Election Commission Page Two March 5, 1981

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# (C) Alleged Violation of 2 U.S.C. 434(b)(1)

With respect to this matter, we wish to call the attention of the Commission to the fact that the reconciliation of cash balances necessitated a detailed analysis of the financial records of NCPAC for the entire year and the preparation of amended monthly reports for the entire year. In order to accomplish that goal as promptly as possible, NCPAC engaged additional staff in November, 1980 to analyze its receipt and disbursement journals, conduct bank reconciliations and match the results against the respective monthly reports. Amended reports, reconciling the cash balances, were then prepared and filed, as follows:

Monthly Report	Amendment Filed On or About
February, 1980 March, 1980 April, 1980 May, 1980 June, 1980 July, 1980 August, 1980 September, 1980 October, 1980 Pre-Election Post-Election Year-End	November 20, 1980 December 16, 1980 December 18, 1980 January 2, 1981 January 9, 1981 January 16, 1981 February 4, 1981 February 17, 1981 February 12, 1981 February 13, 1981 March 2, 1981 March 2, 1981

In light of the financial activity of NCPAC during 1980, \$5,338,962 in contributions and \$5,240,925 in disbursements, we request that the Commission consider the magnitude of the task which was accomplished in a relatively brief period of time.

Federal Election Commission Page Three March 5, 1981

### (D) Conclusion

In conclusion, it is respectfully requested that the Commission give due consideration to the mitigating factors involved in this matter. During the course of 1980, NCPAC was faced with an unanticipated increase in activity which overburdened its compliance personnel and support systems. Immediate steps were taken to correct the deficiencies and file amended reports. Furthermore, NCPAC has now engaged an experienced accountant, in the capacity of Assistant Office Manager, who will work closely with its bookkeeping department on a full-time basis to prevent a recurrence of the type of problems originally called to the attention of the Commission.

Sincerely yours,

Counsel to National Conservative

Political Action Committee

cc: Office of General Counsel





ATTORNEYS AT LAW
7600 OLD SPRINGHOUSE ROAD
MCLEAN, VIRGINIA 22102

# To:

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

FIRST CLASS MAIL





#### FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

February 18, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

J. Curtis Herge, Esquire 7600 Old Springhouse Road McLean, Virginia 22102

RE: MUR 1294

National Conservative Political Action Committee

Dear Mr. Herge:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on October 15, 1980, found reason to believe that your client had violated 2 U.S.C. § 434(b)(3)(A), § 434(b)(8) and § 434(b)(1), and instituted an investigation in this matter.

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

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

Letter to J. Curtis Herge
Page Two
MUR 1294 - National Conservative Political Action Committee

A finding of probable cause to believe requires that the Office of General Counsel attempt for a period of not less than thirty, but not more than ninety days to settle this matter through a conciliation agreement. This does not preclude settlement of this matter through conciliation prior to a finding of probable cause to believe, if you so desire.

Should you have any questions, please contact Beverly Brown at (202) 523-4529.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

Brief

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CERTIFIEL BAIL LLTUER RECEIPT REQUESTED o. curtis ferge, Esquire 7000 Old Springhouse Road ..chean, Virtinia 22102 PI: MUR 1294 Mational Conservative Political Action Committee CO cear Hr. Lerce: rased on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Liection Courission, on October 15, 1980, found reason to Lelieve that your client mac violated 2 U.S.C. 5 434(b)(3)(A), 2 404(L)(E) and 5 404(b)(1), and instituted an investigation i: this catter. after considering all the evidence available to the consisten, the office of General Counsel is prepared to recemend that the Commission find probable cause to believe that a viciation has occurred. 0,0 condition for your review is a brief stating the accition of the Cameral Councel on the legal and factual resuct of the cute. Within rifteen days of jour receipt or this notice, you may file with the Decretary of the commission a major (le copies if possible) stating your position on the issues and roplying to the brief of the control Counsel. (Three copies of such brick should also is conversed to the Office of (eneral Counsel If possible.) The Central caused's arief and any brief which you may worder to be considered by the Combission before procountry to a vote of probable cause to believe a violation tal tectilities.

Letter to J. Curtis herge Page Two MUR 1294 - National Conservative Political Action Committee A finding of probable cause to believe requires that the Office of General Counsel attempt for a period of not less than thirty, but not more than ninety days to settle this matter through a conciliation agreement. This does not preclude settlement of this matter through conciliation prior to a finding of probable cause to believe, if you so desire. should you have any questions, please contact beverly brown at (202) 523-4529. Sincerely, Charles N. Steele General Counsel 1 -Enclosure Brief Prepared by Beverly Brown: ano 2/6/81 POB 2/9/81 9

February 18, 1981

MEMORANDUMTO: Marjorie W. Emmons

FROM: Elissa T. Garr

SUBJECT: MUR 1294

Please have the attached Memo and Brief distributed to the Commission on an informational basis. Thank you.



### FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

8! FEB18 P2: 38

February 18, 1981

#### MEHORANDUM

TO:

The Commission

FROM:

Charles N. Steele

Ceneral Counsel

SUBJECT:

MUR # 1294

Attached for the Commission's review is a brief stating the position of the General Counsel on the legal and factual issues of the above-captioned matter. A copy of this brief and a letter notifying the respondent of the General Counsel's intent to recommend to the Commission a finding of probable cause to believe was mailed on February 18, 1981. Following receipt of the Respondent's reply to this notice, this office will make a further report to the Commission.

#### Attachments

- 1. Erief
- 2. Letter to Respondent's counsel, Mr. J. Curtis Herge

BEFORE THE FEDERAL ELECTION COMMISSION February 6, 1981 In the Matter of MUR 1294 (80) National Conservative Political ) Action Committee GENERAL COUNSEL'S BRIEF I. Statement of the Case Eased on information ascertained during the review of reports and statements filed by the National Conservative Political Action Committee (the "Committee"), the Commission, on October 15, 1980, found reason to believe the Committee violated certain provisions of the Federal Election Campaign Act, as amended (the "Act"). Specifically, the Commission found reason to believe that the Committee violated: 2 U.S.C. § 434(b)(3)(A) by failing to disclose the identification of persons whose contributions to the Committee exceeded an aggregate of \$200 within the calendar year; (2) 2 U.S.C. § 434(b)(8) by failing to disclose the circumstances and conditions under which debts were extinguished for less than their reported amounts; and (3) 2 U.S.C. § 434(b)(1) by failing to properly disclose the amount of cash on hand for calendar years 1979 and 1980. Legal Analysis II. On November 3, 1980, Mr. J. Curtis Herge, counsel for the National Conservative Political Action Committee, responded to a written notice from the Commission which indicated the provisions

- 2 of the Act that may have been violated and the legal basis upon which the Commission was proceeding. (See Attachment #1) The response from Mr. Herge admits the findings of fact but calls the attention of the Commission to various mitigating factors of the case. (See Attachment #2) Based on this response, the Office of General Counsel is prepared to recommend that the Commission find probable cause to believe that the National Conservative Political Action Committee violated provisions of the Act, and consider the mitigating factors in our attempts to come to a resolution of this matter. A. Violation of 2 U.S.C. § 434(b)(3)(A). Regarding the Committee's failure to disclose in a timely manner the identification of persons whose contributions to the Committee exceeded an aggregate of \$200 within a calendar year pursuant to 2 U.S.C. § 434(b)(3)(A), Mr. Herge avers the problems were due to the following circumstances. (1) In anticipation of the 1980 election, the Committee established field operations in the summer of 1979. Contrary to the directions of the Committee, some of the field operatives were dilatory in submitting the contributor data to the Committee. Upon discovery, the Committee took immediate steps to correct the practice by having all contributions remitted immediately and directly to the Committee in Virginia. The collection of previous contributor data took time, however, so the Committee's former treasurer determined not to file supporting schedules for itemized contributions until all contributor data was available.

- 3 -At approximately the same time, the Committee increased its volume of direct mail solicitations, resulting in the accumulation of a significant volume of contributor data for processing. In April, 1980, the current treasurer, Ms. Hannegan, was employed and the former treasurer resigned her employment with the Committee. Ms. Hannengan had no prior experience in preparing reports and she was not immediately informed of the pending problems. The computer firm of Wiland & Associates, Inc., which (4)had been engaged by the Committee to process contributor data and produce computerized schedules of contributions for the Committee's reports, moved its facilities in July, 1980. The move caused a backlog in data entry of contributor information. printout for June was delivered to the Committee approximately six weeks later and the printout for July was delivered approximately eight week later. In August, 1980, Wiland and Associates delivered to the Committee computerized printouts for earlier periods. Subsequent to filing these printouts with the Commission, the Committee discovered that some of the printouts inadvertently included contributions to other clients of Wiland & Associates. Upon discovery, the Committee filed additional amendments to correct these errors. (e.g., On October 27, 1980, Ms. Hannegan filed an additional amendment to the Committee's August Monthly Report). (6) On August 8, 1980, the Committee dismissed Wiland and Associates, Inc. and engaged a new firm, Directech. Directech

required time to program its computers, resulting in the delayed submission of the Committee's September Monthly Report. In addition to calling the attention of the Commission to the circumstances under which the Committee failed to disclose contributor information in a timely fashion, Mr. Herge incorporates by reference to his response, evidence that the Committee has filed requisite delinquent contributor data. The Reports Analysis Division has reviewed the referenced reports and has informed this Office that the amendments satisfy the requirement of 2 U.S.C. § 434(b)(3)(A). Eased on the foregoing facts of this case, the Office of General Counsel recommends that the Commission find probable cause to believe that the National Conservative Political Action Committee violated 2 U.S.C. § 434(b)(3)(A) and to consider the mitigating factors in attempting to reach a resolution of this matter. Violation of 2 U.S.C. § 434(b)(8) With respect to the Committee's failure to report the circumstances and conditions under which debts were extinguished for less than their reported amounts, pursuant to 2 U.S.C. § 434(b)(8), Mr. Herge explains that the reporting problems in question were due to the fact that, while the Commission was revising its reporting forms (i.e., the new Form 3X), the Committee was undergoing a transition in the treasurers who are responsible for the preparation of reports to the Commission.

# C. Violation of 2 U.S.C. § 434(b)(1)

Regarding the Committee's failure to properly disclose cash on hand, pursuant to 2 U.S.C. § 434(b)(1), Mr. Herge admits the finding of fact and reveals the situation which gave rise to the reporting discrepancies. According to information obtained from the Committee, the cash on hand discrepancies resulted from poor communication and cooperation with field operators who were responsible for reporting relative expenditures made in the field. While those difficulties were corrected, the Committee determined to postpone the reconciliation of cash balances until all reporting discrepancies were accounted for.

At this time, cash on hand discrepancies still exist in the Committee's reports on file at the Commission. However, Mr. Herge reports that the Committee is now in a position to begin the reconciliation of cash balances. The Committee in this regard is willing to work with the Commission staff within a time frame established by the Commission.

In view of the above, the Office of General Counsel recommends that the Commission find probable cause to believe that the National Conservative Political Action Committee violated 2 U.S.C. § 434(b)(1).

#### Recommendations

- 1. Find probable cause to believe that the National Conservative Political Action Committee violated 2 U.S.C. \$434(b)(3)(A).
- 2. Find probable cause to believe that the National Conservative Political Action Committee violated 2 U.S.C. § 434(b)(8).
- 3. Find probable cause to believe that the National Conservative Political Action Committee violated 2 U.S.C. § 434(b)(1).

13 February 1981

Charles N. Steele General Counsel

#### Attachments

C

- 2. Attachment #2 Reply to the Commission's Notification of Findings in MUR 1294

#### GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE October 16, 1980

MUR NO. 1294 STAFF MEMBERS & TEL. NO.

RESPONDENT National Conservative

Beverly Brown (202) 523-4529

Political Action Committee (NCPAC)

Hal Ponder (202) 523-4166

SOURCE OF MUR: INTERNALLY GENERATED

#### SUMMARY OF ALLEGATIONS

During review of reports and statements filed by the National Conservative Political Action Committee (the "Committee"), analysts noted violations of certain provisions of the Federal Election Campaign Act of 1971, as amended (the "Act"). Specifically, analysts determined that the Committee may have violated:

- 2 U.S.C. § 434(b)(3)(A) by failing to timely disclose the identification of individuals whose contributions to the Committee aggregated in excess of \$200 within the calendar year, together with the date and amount of such contributions;
- 2 U.S.C. § 434(b)(8) by failing to disclose the circumstances and conditions under which debts were reduced for less than their reported amounts; and
- 2 U.S.C. § 434(b)(l) by failing to properly disclose cash on hand.

On September 16, 1980, the Reports Analysis Division referred this matter to the Office of General Counsel noting that the alleged violations are of an ongoing nature.

#### FACTUAL AND LEGAL ANALYSIS

Disclosure of Individual Contributions 1.

2 U.S.C. § 434(b)(3)(A) requires a political committee to disclose the identification of each person who makes a contribution to the reporting committee during the reporting period, whose contribution or contributions have an aggregate amount

or value in excess of \$200 within the calendar year, or in any lesser amount if the reporting committee should so elect, together with the date and amount of any such contribution.  $\underline{1}$ /

Reports filed by the Committee for the period covering August 1, 1979 through June 30, 1980, disclosed itemized receipts of \$58,122 from approximately 475 persons whose contributions for the calendar years exceeded an aggregate of \$100 or \$200. Amendments to reports for the above-referenced period, filed in August of 1980, subsequently revealed that the Committee was required to itemize approximately 2047 of previously unitemized contributions totalling \$523,965. In a cover letter to those amendments, the treasurer, Susan S. Hannegan, reported that the failure to itemize on original reports an estimated 81% of contributions required to be itemized resulted from the fact that the Committee's computer service mixed their contributor information with one of its other clients. The treasurer further stated that the error had been corrected. (See Exhibit "B").

Subsequent to the filing of amendments for the September 1979 through the July 1980 Monthly Report (covering August 1, 1979 through June 30, 1980), the Committee filed its August 1980 Monthly Report of receipts and expenditures (covering 7/1/80 through 7/31/80). Therein, analysts noted that the Committee disclosed unitemized receipts from individuals of an amount totalling \$472,977. No amount was listed nor were schedules attached for itemization of contributions aggregating in excess of \$200 within the calendar year. Therefore, on September 12, 1980, the Reports Analysis Division sent an informational notice to advise the Committee of disclosure requirements pursuant to 2 U.S.C. § 434(b)(3)(A). In addition, analysts referred this matter to our office for legal consideraton.

The Office of General Counsel reviewed information made available through the Data and Reports Analysis Divisions to determine whether the Committee had subsequently filed an amendment to its August 1980 Monthly Report. Our review revealed that on September 19, 1980, the Committee filed an amendment to this report and, in addition, a September Monthly 1980 Report (covering 8/1/80 through 8/31/80). The amendment revealed contributions totalling \$50,530 which were required to be itemized. The September Monthly disclosed the receipt of contributions totalling \$542,259, none of which were itemized. However, in a footnote to this figure, the Committee indicated that an amendment to the

Prior to the 1979 amendment to the Federal Election Campaign Act, 2 U.S.C. § 434(b)(2) required political committees to disclose the full name and mailing address (occupation, principal place of business, if any) of each person who made one or more contributions to or for such committee or candidate in an aggregate amount or value in excess of \$100, together with the amount and date of such contributions.

September Monthly Report disclosing itemized contributions would be forthcoming. Furthermore, in a cover letter to these reports, the treasurer of the Committee offered this additional comment:

"Due to the volume of our contributions our computer service has difficulty in preparing these reports at the time our monthly FEC reports are due. For this reason we have recently changed computer outfits and hopefully this problem will improve in the future."

Failure to disclose the identification of persons whose contributions to the Committee exceed an aggregate of \$200 within the calendar year violates 2 U.S.C. § 434(b)(3)(A). In view of the magnitude of the violation noted with respect to this provision; the fact that the Committee was two to eight months delinquent in amending its reports and revealing the circumstances under which timely disclosure could not be accomplished; and, the fact that reporting problems with respect to disclosure of itemizable contributions appear to be of an ongoing nature, the Office of General Counsel recommends that the Commission find reason to believe the Committee violated 2 U.S.C. § 434(b)(3)(A).

#### 2. Disclosure of Outstanding Debts and Obligations

2 U.S.C. § 434(b)(8) requires continuous disclosure of the amount and nature of outstanding debts owed by or to such political committee; and where such debts and obligations are settled for less than their reported amount or value, a statement as to the circumstances and conditions under which such debts or obligations were extinguished and the consideration therefor.

During review of the Committee's debt and obligation schedules for its April Monthly Report of receipts and expenditures, analysts determined that the balance of debts owed to Richard A. Viguerie Co. decreased by \$68,670. However, related expenditures for a portion or \$10,272, of this debt reduction were not itemized as required, nor did the Committee provide a statement as to the circumstances and conditions under which this portion of the debt was extinguished. In addition, analysts noted that the Committee failed to disclose the conditions under which a portion, or \$2,337, of the balance of debts owed to American Mailing Lists were extinguished.

On June 3, 1980, the Reports Analysis Division sent a letter to notify the Committee of the above findings made during the review of its April Monthly 1980 Report. Therein, analysts recommended that the Committee amend its report within fifteen days to correct the reporting problems noted in the course of review. After a period of twenty-nine days had expired, the Reports Analysis Division issued a second notice to inform the Committee that if no response was received within fifteen days, the Commission might choose to initiate audit or legal enforcement action.

On September 16, 1980, the Reports Analysis Division referred this matter to our office, noting as reason for referral the Committee's failure to respond to requests for additional information and the presence of ongoing problems in this area of disclosure.

Specifically, review of reports filed subsequent to the April Monthly Report revealed that for the months of May and June related expenditures or circumstances under which the following debts were extinguished had not been disclosed:

Vendor	Portion of debt extinguished for which there is no explanation on file
Prep Inc. Metro Printing Diversified Direct Inc. Berlin & Jones Inc. Response Graphics	\$13,481 2,055 1,051 1,563 1,001 Total \$19,151

In view of the Committee's failure to provide the circumstances and conditions under which debts were extinguished at \$31,760 less than their reported amount during the periods covered by its April, June and July monthly reports, the Office of General Counsel recommends that the Commission find reason to believe that the National Conservative Political Action Committee violated 2 U.S.C. § 434(b)(8).

#### 3. Disclosure of Cash On Hand

2 U.S.C. § 434(b)(1) requires a political committee to disclose the amount of cash on hand at the beginning of the reporting period including: currency; balance on deposit in banks, savings and loan institutions, and other depository institutions; travelers checks owned by the committee; certificates of deposit, treasury bills and any other committee investments valued at cost.

During review of reports filed by the Committee, analysts noted a discrepancy of \$16,543 between the ending cash balance for the August Monthly 1979 Report (\$57,255) and the beginning cash balance reported for the September Monthly 1979 Report (\$40,712).

On June 3, 1980, analysts notified the Committee of the \$16,543 cash on hand discrepancy and recommended that the Committee amend its original reports to clarify this matter for the public record. On June 25, 1980, the Committee requested an extension of time in which to review its records and reply to the Commission's notification. When no response was received within a seven day period of extension, the Reports Analysis Division sent a second notice to the Committee.

On August 6, 1980, the Committee filed an amendment to its August Monthly 1979 Report. In a cover letter to this report, the Committee revealed that the discrepancy was due to mathematical errors, voided checks, bank charges and changes in the original amount of receipts disclosed. In addition to the August Monthly 1979 Report, the Committee submitted amended summary pages for all reports filed through the December Monthly 1979 Report. For these pages, cash on hand totals were adjusted due to the corrections made to the original August Monthly 1979 Report.

Based on information provided in the referral of this matter to the Office of General Counsel, it appears that the Committee has failed to reconcile cash on hand discrepancies. The amendments filed with respect to 1979 election activity disclose an ending cash balance of \$47,919 for the period ending November 30, 1979. The beginning cash balance for the period commencing December 1, 1979 is disclosed as \$37,544. Thus, a new cash on hand discrepancy of \$10,375 exists.

Although the Reports Analysis Division has not given prior notice of the new cash on hand discrepancy noted during review of the Committee's December Monthly 1979 Report and the Year End 1979 Report, for purposes of consistency in handling, the Office of General Counsel recommends the Commission find reason to believe the Committee violated 2 U.S.C. § 434(b)(1).

#### RECOMMENDATIONS

- 1. Find reason to believe that the National Conservative Political Action Committee violated 2 U.S.C. § 434(b)(3)(A).
- 2. Find reason to believe that the National Conservative Political Action Committee violated 2 U.S.C. § 434(b)(8).
- 3. Find reason to believe the National Conservative Political Action Committee violated 2 U.S.C. § 434(b)(1).

# SEDAM & HERGE

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

MCLEAN, VIRGINIA 22102 A | 1 45

(703) 821-1000

1700 PENNSYLVANIA AVENUE, N.W. WASHINGTON, D.C. 20006 (202) 393-7124

November 3, 1980

TWX/TELEX: 710-831-0896

The Honorable John Warren McGarry Vice Chairman Federal Election Commission 1325 K Street, N.W. Washington, D.C. 20463

Attention: Beverly Brown

Re: MUR 1294

Dear Mr. McGarry:

GLENN J. SEDAM, JR.

MICHAEL D. HUGHES

ROBERT R. SPARKS, JR.

A, MARK CHRISTOPHER KARIN LUSSEN BLAIR JOHN ROBERT CLARK III J. STANLEY PAYNE, JR.

J. CURTIS HERGE

This letter is written on behalf of our client, National Conservative Political Action Committee, 1500 Wilson Boulevard, Arlington, Virginia 22209 (hereinafter referred to as NCPAC), in response to your letter to NCPAC, dated October 16, 1980, in which you reported that the Federal Election Commission determined that there is reason to believe that NCPAC violated sections 434(b)(3)(A), 434(b)(1) and 434(b)(8) of the Federal Election Campaign Act of 1971, as amended. The Commission has numbered this matter MUR 1294.

In paragraph 1 of the General Counsel's Factual and Legal Analysis, which was prepared in connection with this matter and dated October 16, 1980 (hereinafter the Analysis), the Office of General Counsel noted that several of the periodic reports filed with the Commission by NCPAC failed to disclose the identification of persons whose contributions to NCPAC exceeded an aggregate of \$200 within the calendar year. NCPAC admits the findings of fact set forth in paragraph 1 of the Analysis, but calls the attention of the Commission to the fact that the requisite reports have now been amended. In addition, NCPAC has corrected the problem which resulted in its inability to disclose the contributor data. The problem was due to the following chain of events:

The Honorable John Warren McGarry Page Two November 3, 1980

- (1) In the summer of 1979, NCPAC commenced the establishment of some field operations in anticipation of the 1980 election campaigns. It was soon discovered that, contrary to the directions of NCPAC, some of the field operatives had received contributions to NCPAC and were dilatory in submitting the contributor data to NCPAC. Immediate steps were taken by NCPAC to correct that practice, by having all contributions remitted immediately and directly to NCPAC in Virginia. The collection of the previous data took some time, however, and the former treasurer of NCPAC decided not to file the contributor data until all the data was available.
- (2) At approximately the same time, NCPAC increased its volume of direct-mail solicitations, resulting in the accumulation for processing of a significant volume of contributor data.
- (3) In April, 1980, the present treasurer of NCPAC, Mrs. Hannegan, was employed and the former treasurer resigned her employment with NCPAC. Mrs. Hannegan had no prior experience in preparing reports and she was not instructed initially about the pending problem.
- (4) The computer firm of Wiland & Associates, Inc., which had been engaged by NCPAC to process contributions and to produce computerized printouts of contributor data for NCPAC's reports, moved its facilities in July, 1980, causing a backlog in keypunching the contributor data. (The printout for June was delivered to NCPAC approximately six weeks late and the printout for July was delivered approximately eight weeks late.)
- (5) In August, 1980, the computerized printouts for earlier periods were delivered to NCPAC by Wiland & Associates, Inc. (and were filed by NCPAC with the Commission), but it was discovered that some of the printouts inadvertantly included contributions to other clients of Wiland & Associates, Inc. (Those errors have been corrected by filing additional amendments. For example, on October 27, 1980, Mrs. Hannegan filed an additional amendment to NCPAC's August Monthly Report.)

The Honorable John Warren McGarry Page Three November 3, 1980

(6) On August 8, 1980, NCPAC dismissed Wiland & Associates, Inc. and engaged a new firm, Directech, but Directech required time to program its computers, resulting in a delay in submitting the contributor data for its September Monthly Report.

We are now assured that the requisite delinquent contributor data has been filed with the Commission; that the contributor data for the October Monthly Report was complete and filed timely; and, that the contributor data for the Pre-Election Report was complete, but filed three days late because of the volume of the data and the extraordinary filing deadline. It thus appears that the problem has been corrected and the new supplier, Directech, is capable of producing the requisite computer printouts in a timely fashion.

The Office of General Counsel also reported to the Commission, in paragraph 2 of its Analysis, that NCPAC failed to report the circumstances and conditions under which certain of its debts were extinguished. NCPAC admits the findings of fact as set forth in paragraph 2 of the Analysis, although it should be noted that, by letter dated June 25, 1980, Mrs. Hannegan advised the Reports Analysis Division that substantial additional time would be needed to correct the reporting problem. A copy of that letter is enclosed.

The reporting problem here in question was due to the fact that, while the Federal Election Commission was revising its report forms, i.e. the new Form 3X, NCPAC was undergoing a transition in treasurers. (Both the former and current treasurer of NCPAC were, and are, responsible for the preparation and submission of NCPAC's reports.) Upon information and belief, the April report was prepared by the former treasurer on the new Form 3X and errors were made in adapting to the new format. The new treasurer, being unfamiliar with and inexperienced in some of the technical aspects of the reports, subsequently received seven letters from the Reports Analysis Division, each dated June 3, 1980,

The Honorable John Warren McGarry Page Four November 3, 1980

requiring the preparation of numerous amended reports. These corrections required, among other things, the amendment of NCPAC's monthly reports, commencing with the September 1979 Monthly Report, each amendment affecting the subsequent month's report. These tasks, combined with the problems outlined above in obtaining the contributor data, required Mrs. Hannegan to establish priorities in fulfilling the requests of the Reports Analysis Division. While the submission of the amendment to the April 1980 Monthly Report was delayed, we have been advised by Mrs. Hannegan that the amendments to the April, June, and July 1980 Monthly Reports have now been filed and that the issues addressed in paragraph 2 of the Analysis have been corrected.

Finally, the Office of General Counsel reported in paragraph 3 of its Analysis that there exists a cash-on-hand discrepancy in NCPAC's December 1979 Monthly Report and its Year End 1979 Report. NCPAC admits the findings of fact as set forth in paragraph 3 of the Analysis, although at this time it can neither confirm nor deny the reported amount of the discrepancy. The situation that gave rise to the discrepancy is that, as reported earlier, NCPAC began to establish some field operations in anticipation of the 1980 election campaigns. At the commencement of those operations some initial communication difficulties were encountered between NCPAC and its field personnel relative to expenditures made in the field. While those difficulties were subsequently corrected, the reconciliation of the cash balances was postponed until after the other reporting errors were corrected. All the data is presently available and NCPAC is in a position to commence the reconciliation/amendment process.

In conclusion, NCPAC admits the findings of fact in paragraphs 1, 2 and 3 of the Analysis, but avers that the problems were due to (1) poor communication and coordination with field personnel; (2) the volume of contributions increased significantly and beyond the processing ability of NCPAC's former computer firm, which firm, in addition, moved its facilities and then produced erroneous printouts; (3) a transition in NCPAC's compliance personnel at a time when the Commission was introducing a new format for its reports; and, (4) the resultant need to file voluminous amendments by

The Honorable John Warren McGarry Page Five November 3, 1980

an undermanned and inexperienced staff. This all transpired at a time when NCPAC was becoming one of the largest political committees in the Nation, meaning the need to coordinate an extraordinary number and amount of contributions and expenditures. Nevertheless, the circumstances which gave rise to these problems have been corrected and the requisite amendments, other than the reconciliation of the cash balances, have been submitted.

NCPAC is now prepared to commence the reconciliation/ amendment process and is prepared to work with the staff of the Commission in this regard and, if the Commission is so disposed, within a time frame established by the Commission.

Sincerely,

J. Curtis Herge

Counsel for National Conservative Political Action Committee

enclosure

# National Conservative Political Action Committee

GCC#2310

1500 wilson blvd. suite 513 arlington, va. 22209 (703) 522-2800

June 25, 1980

: 45

Mark Kleinman
Federal Election Commission
Washington, D.C. 20463

Dear Mr. Kleinman,

As I explained in our conversation in reference to your letters dated June 3, 1980 concerning our monthly reports for August/ September 1979, November 1979, December 1979, Year End 1979, February 1980, and April 1980, it will be necessary for me to have an extention of time to look into each report. I have only been with NCPAC a short time and due to the fact that the reports in question date back as far as they do, I'm sure you understand the reasons for my request. I will be filing ammendments to these reports one at a time over the next few months.

I appreciate your co-operation and understanding in this matter. If you should have any questions, please feel free to contact me the number is (703) 522-2800.

Susan S. Hurregen

Susan S. Hannegan

Treasurer

SSH:ech



## FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 3, 1930

Susan S. Hannegan, Treasurer National Conservative Political Action Committee 1500 Wilson Blvd. Suite 513 Arlington, VA 22209

Identification No: C00024687

Reference: September Monthly Report (8-1-79 to 8-31-79)

Dear Ms. Hannegan:

This letter is prompted by the Commission's preliminary review of your September Monthly Report. The review raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act. An itemization of these areas follows:

- The ending cash balance of one report should be exactly the same as the beginning cash balance of the next. The August Monthly Amendment shows an ending balance of \$57,255 (Line 10) Column B, while the September Monthly report shows a beginning balance of \$40,712 (Line 7) Column A.

An amendment to your original report correcting the above problems should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,

Mark Kleinman Reports Analyst

Reports Analysis Division



# FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 3, 1980

Susan S. Hannegan, Treasurer National Conservative Political Action Committee 1500 Wilson Blvd. Suite 513 Arlington, VA 22209

Identification No: C00024687

Reference: November Monthly Report (10-1-79 to 10-31-79)

Dear Ms. Hannegan:

This letter is prompted by the Commission's preliminary review of your November Monthly Report. The review raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act. An itemization of these areas follows:

- Your committee has made loans to <u>Jed Richardson For Congress</u> and <u>Friends of Denny Smith</u> on the expenditure schedule (Schedule B). When there are loans made by a committee, they should also be reflected on the debt schedule (Schedule C).

An amendment to your original report correcting the above problems should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,

Mark Kleinman Reports Analyst

Reports Analysis Division



WASHINGTON, D.C. 20463

June 3, 1980

Susan S. Hannegan, Treasurer National Conservative Political Action Committee 1500 Wilson Blvd. Suite 513 Arlington, VA 22209

Identification No: C00024687

Reference: December Monthly Report (11-1-79 to 11-30-79)

Dear Ms. Hannegan:

This letter is prompted by the Commission's preliminary review of your December Monthly Report. The review raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act. An itemization of these areas follows:

- Please clarify the entry on Schedule E, Line 23 to <u>Target '80</u> 11-21-79 \$2,200 for "Postage Expense". If this was a transfer to another political committee, then please so state and indicate whether this should be shown on Schedule B, Line 22.

In addition, please provide your relationship with Target '80, if any.

An amendment to your original report correcting the above problems should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,

Mark Kleinman Reports Analyst

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Hational Conservative Political Action Committee

Full Name, Name, Address and EP Code

Wational Conservative Political Action Committee

1500 Wilson Boulevard
Arlington, VA 22209

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My Commence & speed



WASHINGTON, D.C. 20463

June 3, 1980

Susan S. Hannegan, Treasurer National Conservative Political Action Committee 1500 Wilson Blvd. Suite 513 Arlington, VA 22209

Identification No: C00024687

Reference: Year End Report (12-1-79 to 12-31-79)

Dear Ms. Hannegan:

This letter is prompted by the Commission's preliminary review of your Year End Report. The review raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act. An itemization of these areas follows:

- Please clarify the entry on Schedule E, Line 23 to <u>Donna Le Porte</u>, Anyone But Culver 12-27-79 \$1,773 for "Postage and Freight Charges". If this was a transfer to another political committee, then please so state and indicate whether this entry should be shown on Schedule B, Line 22.

In addition, please state your relationship with Anyone But Culver, if any.

- Your committee has made loans to <u>Don Lyon For Congress</u> and <u>Citizen's Advocate PAC</u>. When there are loans made by a committee, they should also be reflected on the debt schedule (Schedule C).

An amendment to your original report correcting the above problems should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,

Mark Kleinman Reports Analyst

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Page 35 of 47 Pages

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WASHINGTON, D.C. 20463

June 3, 1980

Susan S. Hannegan, Treasurer National Conservative Political Action Committee 1500 Wilson Blvd. Suite 513 Arlington, VA 22209

Identification No: C00024687

Reference: February Monthly Report (1-1-80 to 1-31-80)

Dear Ms. Hannegan:

This letter is prompted by the Commission's preliminary review of your February Monthly Report. The review raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act. An itemization of these areas follows:

- Please clarify the entry on Schedule B, Line 20a to Robert
Dornan for "Reimbursed expenses and speaking Honorariums"
1-24-80 \$874, by providing the amount which was the honorarium as defined 11 CFR 110.12.

An amendment to your original report correcting the above problems should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,

Mark Kleinman

Reports Analyst



WASHINGTON, D.C. 20463

June 3, 1980

Susan S. Hannegan, Treasurer National Conservative Political Action Committee 1500 Wilson Blvd. Suite 513 Arlington, VA 22209

Identification No: C00024687

Reference: April Monthly Report (3-1-80 to 3-31-80)

Dear Ms. Hannegan:

This letter is prompted by the Commission's preliminary review of your April Monthly Report. The review raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act. An itemization of these areas follows:

- Your debt schedule (Schedule D) discloses payments this period to: Richard A. Viguerie Co., American Mailing Lists and Medi-America of \$68,670; \$5,376; and \$30,486 respectively. However, a review of your expenditure schedules (Schedule B and Schedule E) discloses total payments, to the above-mentioned entities respectively, of only \$58,402; \$3,039; and \$23,703.

An amendment to your original report correcting the above problems should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,

Mark Kleinman Reports Analyst



WASHINGTON, D.C. 20463

June 3, 1980

Susan S. Hannegan, Treasurer National Conservative Political Action Committee 1500 Wilson Blvd. Suite 513 Arlington, VA 22209

Identification No: C00024687

Reference: Statement of Organization

Dear Ms. Hannegan:

This letter is prompted by the Commission's preliminary review of your Statement of Organization. The review raised questions as to the reporting of certain information required by the Federal Election Campaign Act. An itemization of these areas follows:

- Your committee's March Monthly and April Monthly Reports were not signed by the proper committee official, as listed on your Statement of Organization. The treasurer (or designee) must sign all committee filings. It is suggested that your committee consider the designation of an assistant treasurer who can sign in the absence of the treasurer. This will help eliminate any delay in filing your reports. If you chose to designate an assistant treasurer, this information should be included on an amended Statement of Organization (FEC Form 1).

An amendment to your original report correcting the above problems should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,

Mark Kleinman

Reports Analyst



WASHINGTON, D.C. 20463

February 18, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

J. Curtis Herge, Esquire 7600 Old Springhouse Road McLean, Virginia 22102

RE: MUR 1294

National Conservative Political Action Committee

Dear Mr. Herge:

based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on October 15, 1980, found reason to believe that your client had violated 2 U.S.C. § 434(b)(3)(A), § 434(b)(8) and § 434(b)(1), and instituted an investigation in this matter.

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

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

Letter to J. Curtis Herge Page Two MUR 1294 - National Conservative Political Action Committee A finding of probable cause to believe requires that the Office of General Counsel attempt for a period of not less than thirty, but not more than ninety days to settle this matter through a conciliation agreement. This does not preclude settlement of this matter through conciliation prior to a finding of probable cause to believe, if you so desire. Should you have any questions, please contact Beverly Brown at (202) 523-4529. Sincerely General Counsel Enclosure Brief



WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE

FROM:

MARJORIE W. EMMONS/MARGARET CHANEY

DATE:

47.7

NOVEMBER 13, 1980

SUBJECT:

MUR 1294 - Interim Investigative Report #1,

dated 11-6-80; Signed 11-10-80; Received

in OCS 11-10-80, 5:03

The above-named document was circulated to the Commission on a 24 hour no-objection basis at 11:00. November 12, 1980.

There were no objections to the Interim Investigative Report at the time of the deadline.

November 10, 1980

MEMORANDUM TO: Marjorie W. Emmons

FROM: Elissa T. Garr

SUBJECT: MUR 1294

Please have the attached Interim Invest Report distributed to the Commission. Thank you.

### BEFORE THE FEDERAL ELECTION COMMISSION November 6, 1980

In the Matter of (80 NOV 10 P 5: 03)

National Conservative Political (80)

Action Committee

### INTERIM INVESTIGATIVE REPORT #1

On October 15, 1980, the Commission determined to find reason to believe that the National Conservative Political Action Committee (the "Committee") violated sections 434(b)(1), 434(b)(3)(A) and 434(b)(8) of the Federal Election Campaign Act of 1971, as amended (the "Act"). On November 3, 1980, Mr. J. Curtis Herge, counsel for the National Conservative Action Committee, responded to a notice supplied by the Commission which indicated the provisions of the Act that may have been violated and a general description of the legal basis on which the Commission was proceeding.

The response from Mr. Herge admits the findings of fact set forth in the Commission's notice to the Committee, but calls the attention of the Commission to various mitigating factors of the case. The Office of General Counsel is currently reviewing this response and has called upon the Reports Analysis Division to assist in the review of amended reports incorporated by reference to the response from Mr. Herge. Upon completion of our review, we will forward a General Counsel's report to the Commission.

Date 1910

Charles N. Steele General Counsel

Gec # 3316 SEDAM & HERGE A PROFESSIONAL CORPORATION ATTORNEYS AT LAW 7600 OLD SPRINGHOUSE ROTOV 3 All: 45 McLEAN, VIRGINIA 22102 (703) 821-1000 GLENN J. SEDAM, JR. 1700 PENNSYLVANIA AVENUE, N W J. CURTIS HERGE WASHINGTON, D.C. 20006 (202) 393-7124 ROBERT R. SPARKS, JR. November 3, 1980 TWX/TELEX: 710-831-0896 MICHAEL D. HUGHES A. MARK CHRISTOPHER CABLE: SEDAMHERGE KAREN LUSSEN BLAIR JOHN ROBERT CLARK III J STANLEY PAYNE, JR. The Honorable John Warren McGarry Vice Chairman Federal Election Commission 1325 K Street, N.W. Washington, D.C. 20463 Attention: Beverly Brown Re: MUR 1294 Dear Mr. McGarry: This letter is written on behalf of our client, National Conservative Political Action Committee, 1500 Wilson Boulevard, Arlington, Virginia 22209 (hereinafter referred to as NCPAC), in response to your letter to NCPAC, dated October 16, 1980, in which you reported that the Federal Election Commission determined that there is reason to believe that NCPAC violated sections 434(b)(3)(A), 434(b)(1) and 434(b)(8) of the Federal Election Campaign Act of 1971, as amended. The Commission has numbered this matter MUR 1294. In paragraph 1 of the General Counsel's Factual and Legal Analysis, which was prepared in connection with this matter and dated October 16, 1980 (hereinafter the Analysis), the Office of General Counsel noted that several of the periodic reports filed with the Commission by NCPAC failed to disclose the identification of persons whose contributions to NCPAC exceeded an aggregate of \$200 within the calendar year. NCPAC admits the findings of fact set forth in paragraph 1 of the Analysis, but calls the attention of the Commission to the fact that the requisite reports have now been amended. In addition, NCPAC has corrected the problem which resulted in its inability to disclose the contributor data. The problem was due to the following chain of events:

The Honorable John Warren McGarry November 3, 1980 In the summer of 1979, NCPAC commenced the establishment of some field operations in anticipation of the 1980 election campaigns. It was soon discovered that, contrary to the directions of NCPAC, some of the field operatives had received contributions to NCPAC and were dilatory in submitting the contributor data to NCPAC. Immediate steps were taken by NCPAC to correct that practice, by having all contributions remitted immediately and directly to NCPAC in Virginia. The collection of the previous data took some time, however, and the former treasurer of NCPAC decided not to file the contributor data until all the data was available. (2) At approximately the same time, NCPAC increased its volume of direct-mail solicitations. resulting in the accumulation for processing of a significant volume of contributor data. (3) In April, 1980, the present treasurer of NCPAC, Mrs. Hannegan, was employed and the former treasurer resigned her employment with NCPAC. Mrs. Hannegan had no prior experience in preparing reports and she was not instructed initially about the pending problem. (4) The computer firm of Wiland & Associates, Inc., which had been engaged by NCPAC to process contributions and to produce computerized printouts of contributor data for NCPAC's reports, moved its facilities in July, 1980, causing a backlog in keypunching the contributor data. (The printout for June was delivered to NCPAC approximately six weeks late and the printout for July was delivered approximately eight weeks late.) (5) In August, 1980, the computerized printouts for earlier periods were delivered to NCPAC by Wiland & Associates, Inc. (and were filed by NCPAC with the Commission), but it was discovered that some of the printouts inadvertantly included contributions to other clients of Wiland & Associates, Inc. (Those errors have been corrected by filing additional amendments. For example, on October 27, 1980, Mrs. Hannegan filed an additional amendment to NCPAC's August Monthly Report.)

The Honorable John Warren McGarry Page Three November 3, 1980

(6) On August 8, 1980, NCPAC dismissed Wiland & Associates, Inc. and engaged a new firm, Directech, but Directech required time to program its computers, resulting in a delay in submitting the contributor data for its September Monthly Report.

We are now assured that the requisite delinquent contributor data has been filed with the Commission; that the contributor data for the October Monthly Report was complete and filed timely; and, that the contributor data for the Pre-Election Report was complete, but filed three days late because of the volume of the data and the extraordinary filing deadline. It thus appears that the problem has been corrected and the new supplier, Directech, is capable of producing the requisite computer printouts in a timely fashion.

The Office of General Counsel also reported to the Commission, in paragraph 2 of its Analysis, that NCPAC failed to report the circumstances and conditions under which certain of its debts were extinguished. NCPAC admits the findings of fact as set forth in paragraph 2 of the Analysis, although it should be noted that, by letter dated June 25, 1980, Mrs. Hannegan advised the Reports Analysis Division that substantial additional time would be needed to correct the reporting problem. A copy of that letter is enclosed.

The reporting problem here in question was due to the fact that, while the Federal Election Commission was revising its report forms, i.e. the new Form 3X, NCPAC was undergoing a transition in treasurers. (Both the former and current treasurer of NCPAC were, and are, responsible for the preparation and submission of NCPAC's reports.) Upon information and belief, the April report was prepared by the former treasurer on the new Form 3X and errors were made in adapting to the new format. The new treasurer, being unfamiliar with and inexperienced in some of the technical aspects of the reports, subsequently received seven letters from the Reports Analysis Division, each dated June 3, 1980,

The Honorable John Warren McGarry Page Four November 3, 1980

requiring the preparation of numerous amended reports. These corrections required, among other things, the amendment of NCPAC's monthly reports, commencing with the September 1979 Monthly Report, each amendment affecting the subsequent month's report. These tasks, combined with the problems outlined above in obtaining the contributor data, required Mrs. Hannegan to establish priorities in fulfilling the requests of the Reports Analysis Division. While the submission of the amendment to the April 1980 Monthly Report was delayed, we have been advised by Mrs. Hannegan that the amendments to the April, June, and July 1980 Monthly Reports have now been filed and that the issues addressed in paragraph 2 of the Analysis have been corrected.

Finally, the Office of General Counsel reported in paragraph 3 of its Analysis that there exists a cash-on-hand discrepancy in NCPAC's December 1979 Monthly Report and its Year End 1979 Report. NCPAC admits the findings of fact as set forth in paragraph 3 of the Analysis, although at this time it can neither confirm nor deny the reported amount of the discrepancy. The situation that gave rise to the discrepancy is that, as reported earlier, NCPAC began to establish some field operations in anticipation of the 1980 election campaigns. At the commencement of those operations some initial communication difficulties were encountered between NCPAC and its field personnel relative to expenditures made in the field. While those difficulties were subsequently corrected, the reconciliation of the cash balances was postponed until after the other reporting errors were corrected. All the data is presently available and NCPAC is in a position to commence the reconciliation/amendment process.

In conclusion, NCPAC admits the findings of fact in paragraphs 1, 2 and 3 of the Analysis, but avers that the problems were due to (1) poor communication and coordination with field personnel; (2) the volume of contributions increased significantly and beyond the processing ability of NCPAC's former computer firm, which firm, in addition, moved its facilities and then produced erroneous printouts; (3) a transition in NCPAC's compliance personnel at a time when the Commission was introducing a new format for its reports; and, (4) the resultant need to file voluminous amendments by

The Honorable John Warren McGarry Page Five November 3, 1980 an undermanned and inexperienced staff. This all transpired at a time when NCPAC was becoming one of the largest political committees in the Nation, meaning the need to coordinate an extraordinary number and amount of contributions and expenditures. Nevertheless, the circumstances which gave rise to these problems have been corrected and the requisite amendments, other than the reconciliation of the cash balances, have been submitted. NCPAC is now prepared to commence the reconciliation/ amendment process and is prepared to work with the staff of the Commission in this regard and, if the Commission is so disposed, within a time frame established by the Commission. Counsel for National Conservative Political Action Committee enclosure

## National Conservative Political Action Committee

GCC#2310

1500 wilson blvd. suite 513 arlington, va. 22209 (703) 522-2800

June 25, 1980

Mark Kleinman Federal Election Commission Washington, D.C. 20463

Dear Mr. Kleinman,

As I explained in our conversation in reference to your letters dated June 3, 1980 concerning our monthly reports for August/ September 1979, November 1979, December 1979, Year End 1979, February 1980, and April 1980, it will be necessary for me to have an extention of time to look into each report. I have only been with NCPAC a short time and due to the fact that the reports in question date back as far as they do, I'm sure you understand the reasons for my request. will be filing ammendments to these reports one at a time over the rext few months.

I appreciate your co-operation and understanding in this matter. If you should have any questions, please feel free to contact me the number is (703) 522-2800.

Sincerely,

Susan S. Hannegan

Susan S. Hannegan

Treasurer

SSH:ech



WASHINGTON, D.C. 20463

June 3, 1980

Susan S. Hannegan, Treasurer National Conservative Political Action Committee 1500 Wilson Blvd. Suite 513 Arlington, VA 22209

Identification No: C00024687

Reference: September Monthly Report (8-1-79 to 8-31-79)

Dear Ms. Hannegan:

This letter is prompted by the Commission's preliminary review of your September Monthly Report. The review raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act. An itemization of these areas follows:

- The ending cash balance of one report should be exactly the same as the beginning cash balance of the next. The August Monthly Amendment shows an ending balance of \$57,255 (Line 10) Column B, while the September Monthly report shows a beginning balance of \$40,712 (Line 7) Column A.

An amendment to your original report correcting the above problems should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,

Mark Kleinman Reports Analyst

Mark Di



WASHINGTON, D.C. 20463

June 3, 1980

Susan S. Hannegan, Treasurer National Conservative Political Action Committee 1500 Wilson Blvd. Suite 513 Arlington, VA 22209

Identification No: C00024687

Reference: November Monthly Report (10-1-79 to 10-31-79)

Dear Ms. Hannegan:

This letter is prompted by the Commission's preliminary review of your November Monthly Report. The review raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act. An itemization of these areas follows:

- Your committee has made loans to <u>Jed Richardson For Congress</u> and <u>Friends of Denny Smith</u> on the expenditure schedule (Schedule B). When there are loans made by a committee, they should also be reflected on the debt schedule (Schedule C).

An amendment to your original report correcting the above problems should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,

Mark Kleinman Reports Analyst



WASHINGTON, D.C. 20463

June 3, 1980

Susan S. Hannegan, Treasurer National Conservative Political Action Committee 1500 Wilson Blvd. Suite 513 Arlington, VA 22209

Identification No: C00024687

Reference: December Monthly Report (11-1-79 to 11-30-79)

Dear Ms. Hannegan:

C:

This letter is prompted by the Commission's preliminary review of your December Monthly Report. The review raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act. An itemization of these areas follows:

- Please clarify the entry on Schedule E, Line 23 to <u>Target '80</u> 11-21-79 \$2,200 for "Postage Expense". If this was a transfer to another political committee, then please so state and indicate whether this should be shown on Schedule B, Line 22.

In addition, please provide your relationship with Target '80, if any.

An amendment to your original report correcting the above problems should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,

Mark Kleinman

Reports Analyst

Mark Di

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Control States Commission 125 K Burres, M.W. Cabbagen, D.C. 8840

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Hational Conservative Political Action Committee

1500 Wilson Boulevard

Arlington, VA 22209

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Subscribed and sworn to before me this a ...... day of

My Communica ( speed



WASHINGTON, D.C. 20463

June 3, 1980

Susan S. Hannegan, Treasurer National Conservative Political Action Committee 1500 Wilson Blvd. Suite 513 Arlington, VA 22209

Identification No: C00024687

Reference: Year End Report (12-1-79 to 12-31-79)

Dear Ms. Hannegan:

This letter is prompted by the Commission's preliminary review of your Year End Report. The review raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act. An itemization of these areas follows:

- Please clarify the entry on Schedule E, Line 23 to <u>Donna Le</u>
<u>Porte, Anyone But Culver</u> 12-27-79 \$1,773 for "Postage and
Freight Charges". If this was a transfer to another political
committee, then please so state and indicate whether this
entry should be shown on Schedule B, Line 22.

- Your committee has made loans to <u>Don Lyon For Congress</u> and <u>Citizen's Advocate PAC</u>. When there are loans made by a committee, they should also be reflected on the debt schedule (Schedule C).

An amendment to your original report correcting the above problems should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,

Mark Kleinman Reports Analyst

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Signature

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WASHINGTON, D.C. 20463

June 3, 1980

Susan S. Hannegan, Treasurer National Conservative Political Action Committee 1500 Wilson Blvd. Suite 513 Arlington, VA 22209

Identification No: C00024687

Reference: February Monthly Report (1-1-80 to 1-31-80)

Dear Ms. Hannegan:

This letter is prompted by the Commission's preliminary review of your February Monthly Report. The review raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act. An itemization of these areas follows:

- Please clarify the entry on Schedule B, Line 20a to Robert Dornan for "Reimbursed expenses and speaking Honorariums" 1-24-80 \$874, by providing the amount which was the honorarium as defined 11 CFR 110.12.

An amendment to your original report correcting the above problems should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,

Mark Kleinman

Reports Analyst



WASHINGTON, D.C. 20463

June 3, 1980

Susan S. Hannegan, Treasurer National Conservative Political Action Committee 1500 Wilson Blvd. Suite 513 Arlington, VA 22209

Identification No: C00024687

Reference: April Monthly Report (3-1-80 to 3-31-80)

Dear Ms. Hannegan:

This letter is prompted by the Commission's preliminary review of your April Monthly Report. The review raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act. An itemization of these areas follows:

- Your debt schedule (Schedule D) discloses payments this period to: Richard A. Viguerie Co., American Mailing Lists and Medi-America of \$68,670; \$5,376; and \$30,486 respectively. However, a review of your expenditure schedules (Schedule B and Schedule E) discloses total payments, to the above-mentioned entities respectively, of only \$58,402; \$3,039; and \$23,703.

An amendment to your original report correcting the above problems should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,

Mark Kleinman Reports Analyst

Wal Q



WASHINGTON, D.C. 20463

June 3, 1980

Susan S. Hannegan, Treasurer National Conservative Political Action Committee 1500 Wilson Blvd. Suite 513 Arlington, VA 22209

Identification No: C00024687

Reference: Statement of Organization

Dear Ms. Hannegan:

This letter is prompted by the Commission's preliminary review of your Statement of Organization. The review raised questions as to the reporting of certain information required by the Federal Election Campaign Act. An itemization of these areas follows:

- Your committee's March Monthly and April Monthly Reports were not signed by the proper committee official, as listed on your Statement of Organization. The treasurer (or designee) must sign all committee filings. It is suggested that your committee consider the designation of an assistant treasurer who can sign in the absence of the treasurer. This will help eliminate any delay in filing your reports. If you chose to designate an assistant treasurer, this information should be included on an amended Statement of Organization (FEC Form 1).

An amendment to your original report correcting the above problems should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,

Mark Kleinman Reports Analyst

#### **SEDAM & HERGE**

ATTORNEYS AT LAW
7600 OLD SPRINGHOUSE ROAD
MCLEAN, VIRGINIA 22012

### To:

Office of General Counsel Federal Election Commission 1325 K Street, N.W. Washington, D.C. 20463 Attention: Beverly Brown

The live

FIRST CLASS MAIL

## National Conservative 31 12:21 GOC# 3191 Political Action Committee

1500 wilson blvd. suite 513 arlington, va. 22209 (703) 522-2800

October 30, 1980

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Mr. Charles N. Steel General Counsel Federal Election Commission 1325 "K" Street Washington, D.C. 20463

Re: MUR 1294

Dear Mr. Steel:

This letter is to inform you Mr. J. Curtis Herge is authorized to represent the National Conservative Political Action Committee in the above referenced case. All correspondence should be directed to him at the address listed below:

> Sedam & Herge 7600 Old Springhouse Road McLean, VA 22102 (793) 821-1090

> > Sincerely,

Candace M. Taw Office '!anager

CMT:nkm

cc: J. Curtis Herge

# National Conservative Political Action Committee

1500 wilson blvd. suite 513 arlington, va. 22209 (703) 522-2800

Mr. Charles N. Steel General Counsel Federal Election Commission 1325 "K" Street Washington, D.C. 20463



WASHINGTON D.C. 20463

October 16, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Susan S. Hannegan, Tresurer National Conservative Political Action Committee 1500 Wilson Boulevard, Suite 513 Arlington, VA 22209

RE: MUR 1294

Dear Ms. Hannegan:

On October 15 1980, the Federal Election Commission determined that there is reason to believe that your committee violated sections 434(b)(3)(A), 434(b)(1) and 434(b)(8) of the Federal Election Campaign Act of 1971, as amended (the "Act"). The General Counsel's factual and legal analysis, which formed the basis for the Commission's finding, is attached for your information.

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

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

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

Letter to Susan S. Hannegan Page 2

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Beverly Brown, the staff member assigned to this matter, at 202/523-4529.

JOHN WARREN MCGARRY Vice-Chairman

#### Enclosures

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General Counsel's Factual and Legal Analysis Procedures

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WASHINGTON DIC 20463

### CERTIFIED MAIL RETURN RECEIPT REQUESTED

Susan S. Hannegan, Tresurer National Conservative Political Action Committee 1500 Wilson Boulevard, Suite 513 Arlington, VA 22209

RE: MUR 1294

Dear Ms. Hannegan:

On , 1980, the Federal Election Commission determined that there is reason to believe that your committee violated sections 434(b)(3)(A), 434(b)(1) and 434(b)(8) of the Federal Election Campaign Act of 1971, as amended (the "Act"). The General Counsel's factual and legal analysis, which formed the basis for the Commission's finding, is attached for your information.

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

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

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

Letter to Susan S. Hannegan Page 2 For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Beverly Brown, the staff member assigned to this matter, at 202/523-4529. Sincerely, Enclosures General Counsel's Factual and Legal Analysis Procedures es. 1 -

FEDERAL ELECTION COMMISSION GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS DATE October 16, 1980 MUR NO. 1294 STAFF MEMBERS & TEL. NO. Beverly Brown (202) 523-4529 RESPONDENT National Conservative Political Action Committee (NCPAC) Hal Ponder (202) 523-4166 SOURCE OF MUR: INTERNALLY GENERATED SUMMARY OF ALLEGATIONS During review of reports and statements filed by the National Conservative Political Action Committee (the "Committee"), analysts noted violations of certain provisions of the Federal Election Campaign Act of 1971, as amended (the "Act"). Specifically, analysts determined that the Committee may have violated: 2 U.S.C. § 434(b)(3)(A) by failing to timely disclose the identification of individuals whose contributions to the Committee aggregated in excess of \$200 within the calendar year, together with the date and amount of such contributions: 2 U.S.C. § 434(b)(8) by failing to disclose the circumstances and conditions under which debts were reduced for less than their reported amounts; 3) 2 U.S.C. § 434(b)(1) by failing to properly disclose cash on hand. On September 16, 1980, the Reports Analysis Division referred this matter to the Office of General Counsel noting that the alleged violations are of an ongoing nature. FACTUAL AND LEGAL ANALYSIS Disclosure of Individual Contributions 1. 2 U.S.C. § 434(b)(3)(A) requires a political committee to disclose the identification of each person who makes a contribution to the reporting committee during the reporting period, whose contribution or contributions have an aggregate amount

- 2 -

or value in excess of \$200 within the calendar year, or in any lesser amount if the reporting committee should so elect, together with the date and amount of any such contribution. 1/2

Reports filed by the Committee for the period covering August 1, 1979 through June 30, 1980, disclosed itemized receipts of \$58,122 from approximately 475 persons whose contributions for the calendar years exceeded an aggregate of \$100 or \$200. Amendments to reports for the above-referenced period, filed in August of 1980, subsequently revealed that the Committee was required to itemize approximately 2047 of previously unitemized contributions totalling \$523,965. In a cover letter to these amendments, the treasurer, Susan S. Hannegan, reported that the failure to itemize on original reports an estimated 81% of contributions required to be itemized resulted from the fact that the Committee's computer service mixed their contributor information with one of its other clients. The treasurer further stated that the error had been corrected. (See Exhibit "B").

Subsequent to the filing of amendments for the September 1979 through the July 1980 Monthly Report (covering August 1, 1979 through June 30, 1980), the Committee filed its August 1980 Monthly Report of receipts and expenditures (covering 7/1/80 through 7/31/80). Therein, analysts noted that the Committee disclosed unitemized receipts from individuals of an amount totalling \$472,977. No amount was listed nor were schedules attached for itemization of contributions aggregating in excess of \$200 within the calendar year. Therefore, on September 12, 1980, the Reports Analysis Division sent an informational notice to advise the Committee of disclosure requirements pursuant to 2 U.S.C. § 434(b)(3)(A). In addition, analysts referred this matter to our office for legal consideraton.

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The Office of General Counsel reviewed information made available through the Data and Reports Analysis Divisions to determine whether the Committee had subsequently filed an amendment to its August 1980 Monthly Report. Our review revealed that on September 19, 1980, the Committee filed an amendment to this report and, in addition, a September Monthly 1980 Report (covering 8/1/80 through 8/31/80). The amendment revealed contributions totalling \$50,530 which were required to be itemized. The September Monthly disclosed the receipt of contributions totalling \$542,259, none of which were itemized. However, in a footnote to this figure, the Committee indicated that an amendment to the

Prior to the 1979 amendment to the Federal Election Campaign Act, 2 C.S.C. § 434(b)(2) required political committees to disclose the full name and mailing address (occupation, principal place of business, if any) of each person who made one or more contributions to or for such committee or candidate in an aggregate amount or value in excess of \$100, together with the amount and date of such contributions.

September Monthly Report disclosing itemized contributions would be forthcoming. Furthermore, in a cover letter to these reports, the treasurer of the Committee offered this additional comment: "Due to the volume of our contributions our computer service has difficulty in preparing these reports at the time our monthly FEC reports are due. For this reason we have recently changed computer outfits and hopefully this problem will improve in the future." Failure to disclose the identification of persons whose contributions to the Committee exceed an aggregate of \$200 within the calendar year violates 2 U.S.C. § 434(b)(3)(A). In view of the magnitude of the violation noted with respect to this provision: the fact that the Committee was two to eight months delinquent in amending its reports and revealing the circumstances under which timely disclosure could not be accomplished; and, the fact that reporting problems with respect to disclosure of itemizable contributions appear to be of an ongoing nature, the Office of General Counsel recommends that the Commission find reason to believe the Committee violated 2 U.S.C. § 434(b)(3)(A). 2. Disclosure of Outstanding Debts and Obligations 2 U.S.C. § 434(b)(8) requires continuous disclosure of the amount and nature of outstanding debts owed by or to such political committee; and where such debts and obligations are settled for less than their reported amount or value, a statement as to the circumstances and conditions under which such debts or obligations were extinguished and the consideration therefor. During review of the Committee's debt and obligation schedules for its April Monthly Report of receipts and expenditures, analysts determined that the balance of debts owed to Richard A. Viguerie Co. decreased by \$68,670. However, related expenditures for a portion or \$10,272, of this debt reduction were not itemized as required, nor did the Committee provide a statement as to the circumstances and conditions under which this portion of the debt was extinguished. In addition, analysts noted that the Committee failed to disclose the conditions under which a portion, or \$2,337, of the balance of debts owed to American Mailing Lists were extinguished. On June 3, 1980, the Reports Analysis Division sent a letter to notify the Committee of the above findings made during the review of its April Monthly 1980 Report. Therein, analysts recommended that the Committee amend its report within fifteen days to correct the reporting problems noted in the course of review. After a period of twenty-nine days had expired, the Reports Analysis Division issued a second notice to inform the Committee that if no response was received within fifteen days, the Commission might choose to initiate audit or legal enforcement action.

On September 16, 1980, the Reports Analysis Division referred this matter to our office, noting as reason for referral the Committee's failure to respond to requests for additional information and the presence of ongoing problems in this area of disclosure.

Specifically, review of reports filed subsequent to the April Monthly Report revealed that for the months of May and June related expenditures or circumstances under which the following debts were extinguished had not been disclosed:

Vendor	Portion of debt extinguished for which there is no explanation on file
Prep Inc. Metro Printing Diversified Direct Inc. Berlin & Jones Inc. Response Graphics	\$13,481 2,055 1,051 1,563 1,001 Total \$19,151

In view of the Committee's failure to provide the circumstances and conditions under which debts were extinguished at \$31,760 less than their reported amount during the periods covered by its April, June and July monthly reports, the Office of General Counsel recommends that the Commission find reason to believe that the National Conservative Political Action Commttee violated 2 U.S.C. § 434(b)(8).

#### 3. Disclosure of Cash On Hand

2 U.S.C. § 434(b)(1) requires a political committee to disclose the amount of cash on hand at the beginning of the reporting period including: currency; balance on deposit in banks, savings and loan institutions, and other depository institutions; travelers checks owned by the committee; certificates of deposit, treasury bills and any other committee investments valued at cost.

During review of reports filed by the Committee, analysts noted a discrepancy of \$16,543 between the ending cash balance for the August Monthly 1979 Report (\$57,255) and the beginning cash balance reported for the September Monthly 1979 Report (\$40,712).

On June 3, 1980, analysts notified the Committee of the \$16,543 cash on hand discrepancy and recommended that the Committee amend its original reports to clarify this matter for the public record. On June 25, 1980, the Committee requested an extension of time in which to review its records and reply to the Commission's notification. When no response was received within a seven day period of extension, the Reports Analysis Division sent a second notice to the Committee.

On August 6, 1980, the Committee filed an amendment to its August Monthly 1979 Report. In a cover letter to this report, the Committee revealed that the discrepancy was due to mathematical errors, voided checks, bank charges and changes in the original amount of receipts disclosed. In addition to the August Monthly 1979 Report, the Committee submitted amended summary pages for all reports filed through the December Monthly 1979 Report. For these pages, cash on hand totals were adjusted due to the corrections made to the original August Monthly 1979 Report.

Based on information provided in the referral of this matter to the Office of General Counsel, it appears that the Committee has failed to reconcile cash on hand discrepancies. The amendments filed with respect to 1979 election activity disclose an ending cash balance of \$47,919 for the period ending November 30, 1979. The beginning cash balance for the period commencing December 1, 1979 is disclosed as \$37,544. Thus, a new cash on hand discrepancy of \$10,375 exists.

Although the Reports Analysis Division has not given prior notice of the new cash on hand discrepancy noted during review of the Committee's December Monthly 1979 Report and the Year End 1979 Report, for purposes of consistency in handling, the Office of General Counsel recommends the Commission find reason to believe the Committee violated 2 U.S.C. § 434(b)(1).

#### RECOMMENDATIONS

- 1. Find reason to believe that the National Conservative Political Action Committee violated 2 U.S.C. § 434(b)(3)(A).
- 2. Find reason to believe that the National Conservative Political Action Committee violated 2 U.S.C. § 434(b)(8).
- 3. Find reason to believe the National Conservative Political Action Committee violated 2 U.S.C. § 434(b)(1).

#### BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
National Conservative Political	)	MUR 1294
Action Committee (NCPAC)	)	

#### CERTIFICATION

- I, Marjorie W. Emmons, Recording Secretary for the Federal Election Commission's Executive Session on October 15, 1980, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 1294:
  - 1. Find reason to believe that the National Conservative Political Action Committee violated 2 U.S.C. §434(b)(3)(A).
  - 2. Find reason to believe that the National Conservative Political Action Committee violated 2 U.S.C. §434(b)(8).
  - 3. Find reason to believe the National Conservative Political Action Committee violated 2 U.S.C. §434(b)(1).
  - 4. Take no action in the matter regarding alleged violation of 2 U.S.C. §434(b)(4)(H)(iii).
  - 5. Approve and send the letter with the General Counsel's Factual and Legal Analysis attached to the General Counsel's October 2, 1980 report.

Attest:

Date

Marjorie W. Emmons Secretary to the Commission



#### FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO: CHARLES STEELE

FROM:

MARJORIE W. EMMONS/MARGARET CHANEY

DATE:

OCTOBER 7, 1980

SUBJECT:

OBJECTION - MUR 1294 - First General Counsel's

Report dated 10-2-80; Received in OCS

10-2-80, 4:58

The above-named document was circulated on a 48

hour vote basis at 2:00, October 3, 1980.

Commissioner Aikens submitted an objection at 2:21, this date.

This matter will be placed on the Executive Session Agenda for Wednesday, October 15, 1980.

October 2, 1980 MEMORANDUM TO: Marjorie W. Emmons Elissa T. Garr FROM: SUBJECT: MUR 1294 Please have the attached First GC Report distributed to the Commission on a 48 hour tally basis. Thank you.

FEDERAL ELECTION COMMISSION
1325 K Street, N.W.
Washington, D.C. 20463

#### FIRST GENERAL COUNSEL'S REPORT

 MUR # 1294
STAFF MEMBER(S)
Beverly Brown

SOURCE OF MUR: INTERNALLY GENERATED

RESPONDENT'S NAME:

National Conservative Political Action

Committee (NCPAC)

RELEVANT STATUTE:

2 U.S.C. § 434(b)(3)(A)

2 U.S.C. § 434(b)(8)

2 U.S.C. § 434(b)(1)

2 U.S.C. § 434(b)(4)(H)(iii)

INTERNAL REPORTS CHECKD:

1979-80 Reports of Receipts and

Expenditures

C-Index

FEDERAL AGENCIES CHECKED: None

P 4:

5

80

#### SUMMARY OF ALLEGATIONS

During review of reports and statements filed by the National Conservative Political Action Committee (the "Committee"), analysts noted violations of certain provisions of the Federal Election Campaign Act of 1971, as amended (the "Act"). Specifically, analysts determined that the Committee may have violated:

- 2 U.S.C. § 434(b)(3)(A) by failing to timely disclose the identification of individuals whose contributions to the Committee aggregated in excess of \$200 within the calendar year, together with the date and amount of such contributions;
- 2) 2 U.S.C. § 434(b)(8) by failing to disclose the circumstances and conditions under which debts were reduced for less than their reported amounts;
- 3) 2 U.S.C. § 434(b)(l) by failing to properly disclose cash on hand; and

- 2 -4) 2 U.S.C. § 434(b)(4)(H)(iii) by failing to disclose independent expenditures during the reporting period in which written contracts for such expenditures were made. On September 16, 1980, the Reports Analysis Division referred this matter to the Office of General Counsel noting that the alleged violations are of an ongoing nature. (See Exhibit "A"). FACTUAL AND LEGAL ANALYSIS Disclosure of Individual Contributions ]. 2 U.S.C. § 434(b)(3)(A) requires a political committee to disclose the identification of each person who makes a contribution to the reporting committee during the reporting period, whose contribution or contributions have an aggregate amount or value in excess of \$200 within the calendar year, or in any lesser amount if the reporting committee should so elect, together with the date and amount of any such contribution. 1/ Reports filed by the Committee for the period covering August 1, 1979 through June 30, 1980, disclosed itemized receipts of \$58,122 from approximately 475 persons whose contributions for the calendar years exceeded an aggregate of \$100 or \$200. Amendments to reports for the above-referenced period, filed in August of 1980, subsequently revealed that the Committee was required to itemize approximately 2047 of previously unitemized contributions totalling \$523,965. In a cover letter to these amendments, the treasurer, Susan S. Hannegan, reported that the failure to itemize on original reports an estimated 81% of contributions required to be itemized resulted from the fact that the Committee's computer service mixed their contributor information with one of its other clients. The treasurer further stated that the error had been corrected. (See Exhibit "B"). Subsequent to the filing of amendments for the September 1979 through the July 1980 Monthly Report (covering August 1, 1979 through June 30, 1980), the Committee filed its August 1980 Monthly Report of receipts and expenditures (covering 7/1/80 through 7/31/80). Therein, analysts noted that the Committee Prior to the 1979 amendment to the Federal Election Campaign Act, 2 U.S.C. § 434(b)(2) required political committees to disclose the full name and mailing address (occupation, principal place of business, if any) of each person who made one or more contributions to or for such committee or candidate in an aggregate amount or value in excess of \$100, together with the amount and date of such contributions.

- 3 disclosed unitemized receipts from individuals of an amount totalling \$472,977. No amount was listed nor were schedules attached for itemization of contributions aggregating in excess of \$200 within the calendar year. Therefore, on September 12, 1980, the Reports Analysis Division sent an informational notice to advise the Committee of disclosure requirements pursuant to 2 U.S.C. § 434(b)(3)(A). In addition, analysts referred this matter to our office for legal considerator. The Office of General Counsel reviewed information made available through the Data and Reports Analysis Divisions to determine whether the Committee had subsequently filed an amendment to its August 1980 Monthly Report. Our review revealed that on September 19, 1980, the Committee filed an amendment to this report and, in addition, a September Monthly 1980 Report (covering 8/1/80 through 8/31/80). The amendment revealed contributions totalling \$50,530 which were required to be itemized. The September Monthly disclosed the receipt of contributions totalling \$542,259, none of which were itemized. However, in a footnote to this figure, the Committee indicated that an amendment to the September Monthly Report disclosing itemized contributions would be forthcoming. Furthermore, in a cover letter to these reports, the treasurer of the Committee offered this additional comment: "Due to the volume of our contributions our computer service has difficulty in preparing these reports at the time our monthly FEC reports are due. For this reason we have recently changed computer outfits and hopefully this problem will improve in the future." (See Exhibit "C"). Failure to disclose the identification of persons whose contributions to the Committee exceed an aggregate of \$200 within the calendar year violates 2 U.S.C. § 434(b)(3)(A). In view of the magnitude of the violation noted with respect to this provision; the fact that the Committee was two to eight months delinquent in amending its reports and revealing the circumstances under which timely disclosure could not be accomplished; and, the fact that reporting problems with respect to disclosure of itemizable contributions appear to be of an ongoing nature, the Office of General Counsel recommends that the Commission find reason to believe the Committee violated 2 U.S.C. § 434(b)(3)(A). Disclosure of Outstanding Debts and Obligations 2 U.S.C. § 434(b)(8) requires continuous disclosure of the amount and nature of outstanding debts owed by or

to such political committee; and where such debts and obligations are settled for less than their reported amount or value, a statement as to the circumstances and conditions under which such debts or obligations were extinguished and the consideration therefor. During review of the Committee's debt and obligation schedules for its April Monthly Report of receipts and expenditures, analysts determined that the balance of debts owed to Richard A. Viguerie Co. decreased by \$68,670. However, related expenditures for a portion or \$10,272, of this debt reduction were not itemized as required, nor did the Committee provide a statement as to the circumstances and conditions under which this portion of the debt was extinguished. In addition, analysts noted that the Committee failed to disclose the conditions under which a portion, or \$2,337, of the balance of debts owed to American Mailing Lists were extinguished. On June 3, 1980, the Reports Analysis Division sent a letter to notify the Committee of the above findings made during the review of its April Monthly 1980 Report. Therein, analysts recommended that the Committee amend its report within fifteen days to correct the reporting problems noted in the course of review. After a period of twenty-nine days had expired, the Reports Analysis Division issued a second notice to inform the Committee that if no response was received within fifteen days, the Commission might choose to initiate audit or legal enforcement action. On September 16, 1980, the Reports Analysis Division referred this matter to our office, noting as reason for referral the Committee's failure to respond to requests for additional information and the presence of ongoing problems in this area of disclosure. Specifically, review of reports filed subsequent to the April Monthly Report revealed that for the months of May and June related expenditures or circumstances under which the following debts were extinguished had not been disclosed: Portion of debt extinguished for which there is no explanation on file Vendor \$13,481 Prep Inc. 2,055 Metro Printing 1,051 Diversified Direct Inc. Berlin & Jones Inc. 1,563 1,001 Response Graphics \$19,151 Total In view of the Committee's failure to provide the circumstances and conditions under which debts were extinguished at \$31,760 less than their reported amount during the periods covered by its April, June and July monthly reports, the Office of General Counsel recommends

- 5 that the Commission find reason to believe that the National Conservative Political Action Commttee violated 2 U.S.C. \$434(b)(8).Disclosure of Cash On Hand 2 U.S.C. § 434(b)(1) requires a political committee to disclose the amount of cash on hand at the beginning of the reporting period including: currency; balance on deposit in banks, savings and loan institutions, and other depository institutions; travelers checks owned by the committee; certificates of deposit, treasury bills and any other committee investments valued at cost. During review of reports filed by the Committee, analysts noted a discrepancy of \$16,543 between the ending cash balance for the August Monthly 1979 Report (\$57,255) and the beginning cash balance reported for the September Monthly 1979 Report (\$40,712). On June 3, 1980, analysts notified the Committee of the \$16,543 cash on hand discrepancy and recommended that the Committee amend its original reports to clarify this matter for the public record. On June 25, 1980, the Committee requested an extension of time in which to review its records and reply to the Commission's notification. When no response was received within a seven day period of extension, the Reports Analysis Division sent a second notice to the Committee. On August 6, 1980, the Committee filed an amendment to its August Monthly 1979 Report. In a cover letter to this report, the Committee revealed that the discrepancy was due to mathematical errors, voided checks, bank charges and changes in the original amount of receipts disclosed. In addition to the August Monthly 1979 Report, the Committee submitted amended summary pages for all reports filed through the December Monthly 1979 Report. For these pages, cash on hand totals were adjusted due to the corrections made to the original August Monthly 1979 Report. Based on information provided in the referral of this matter to the Office of General Counsel, it appears that the Committee has failed to reconcile cash on hand discrepancies. The amendments filed with respect to 1979 election activity disclose an ending cash balance of \$47,919 for the period ending November 30, 1979. The beginning cash balance for the period commencing December 1, 1979 is disclosed as \$37,544. Thus, a new cash on hand discrepancy of \$10,375 exists. Although the Reports Analysis Division has not given prior notice of the new cash on hand discrepancy noted during review of the Committee's December Monthly 1979 Report and the Year End 1979 Report, for purposes of consistency in handling, the Office of General Counsel recommends the Commission find reason to believe the Committee violated 2 U.S.C. § 434(b)(1).

- 6 -4. Disclosure of Independent Expenditures The term "independent expenditure" means an expenditure by a person expressly advocating the election or defeat or a clearly identified candidate which is made without cooperaton or consultation with any candidate, or any authorized committee or agent of such candidate, and which is not made in concert with or at the request or suggestion of any candidate or any authorized committee or agent of such candidate. 2 U.S.C. § 431(17). 2 U.S.C. § 434(b)(4)(H)(iii) and ll C.F.R. § 104.4(a) require a political committee which makes independent expenditures to report all such expenditures on Schedule E for the reporting period and the calendar year. Pursuant to 2 U.S.C. § 431(9)(A)(ii), the term "expenditure" includes "a written contract, promise or agreement to make an expenditure. During the review of reports filed by the Committee for calendar years 1979 and 1980 analysts noted that debts and obligations owed by the Committee were reported on Schedule C (Debt Schedule) at the time contractual agreements with vendors were made; however, during the reporting period in which debts were disclosed, the reports did not reflect those portions of the debts incurred for purposes of making independent expenditures. The only time in which it was revealed that expenditures were made for purposes of advocating the election or defeat of a candidate was, on the average, three months after communications were made. At that time the Committee would report on Schedule E (Independent Expenditure Schedule) cash disbursements made to vendors to extinguish or reduce the amount of debt allocated for purposes of making such expenditures and the details therefor (i.e., whether such expenditures were made in support of or opposition to a candiate for federal office; whether communications 00 were made by radio, televison, direct mail, etc.). Upon noting that the Committee had failed to disclose independent expenditures during the reporting period in which written contracts for such expenditures were made, the Reports Analysis Division, on July 16, 1979, notified the Committee of the manner in which anticipated expenditures (accounts payable) were to be disclosed. Specifically, analysts advised the Committee to report that portion of the debt incurred for purposes of making independent expenditures as a memo entry on line 23 (for independent expenditures) of the Detailed Summary Page in addition to being disclosed on Schedule C (Debt Schedule prior to 1980 revisions).

- 7 -On December 27, 1979, the Committee responded to the notification of July 16, 1979. With respect to the above recommendation, the Committee treasurer made the following reply: "On these reports, all expenditures which were allocated to candidates either as in-kind or independent expenditures were reported to the Commission as soon as the actual check to cover the expenditure was written. If the expenditure qualified to be listed on the debt schedule it was listed there in previous reports, and removed as specified when paid. I have never been instructed otherwise until now, and have continually tried to the best of my ability to comply with all provisions of the Federal Election Campaign Act. I will, however, keep your recommendations in mind to avoid future occurrences of this type." (See Exhibit "A" at attachment #4). In view of the Committee's failure to comply with the recommendation contained in the analyst's notification of July 16, 1979, with respect to the disclosure of independent expenditures on subsequent reports, this matter was referred to the Office of General Counsel. While the Act clearly defines "expenditure" as a written contract, promise or agreement to make an expenditure, reporting forms do not facilitate the disclosure of anticipated expenditures. In accordance with disclosure requirements pursuant to 2 U.S.C. § 434, reporting forms currently reflect a cash-based system as opposed to an accrual system for reporting financial activity in connection with federal elections. In this manner all forms are designed to assist committees in deriving a cash balance figure after combined totals for beginning cash on hand and cash receipts for the period are offset by cash disbursements made during such period. In essence, the forms are likened to a personal checking account through which the flow of cash may be traced. Unlike the accrual system, the cash-based system does not take into consideration accounts receivable and accounts payable. This type of accounting system is highly sophisticated, and difficult for the more inexperienced bookkeeper to track. Since campaigns vary in their sophistication, forms based upon an accrual system were not adopted by the Commission. However, for purposes of facilitating disclosure with respect to debts and obligations required to be reported pursuant to 2 U.S.C. § 434(b), the Commission did adopt Schedules C and D, which

- 8 represent a hybrid of the cash-based system and the accrual system. Debts and obligations are itemized on these schedules, however, they are not figured into the totals for receipts and expenditures. Since reporting forms do not facilitate the disclosure of anticipated expenditures, the question becomes one of determining whether, through use of "memo entries" the Commission can require disclosure of anticipated expenditures or whether no such disclosure can be required since the reporting forms, as recently revised, do not instruct the committees as to how such expenditures may be disclosed and the Act as amended in 1979, no longer provides that reporting committees are required to disclose "such other informaton as shall be required by the Commission" pursuant to former 2 U.S.C. § 434(b)(14). In view of the fact that the Act is not clear on the question of whether political committees are required to disclose the details of anticipated expenditures at the time written contracts for such expenditures are made; and, in view of the fact that reporting forms fail to facilitate the disclosure of such expenditures, the Office of General Counsel recommends that the Commission take no action in the matter regarding an alleged violation of 2 U.S.C. § 434(b)(4)(H)(iii). RECOMMENDATIONS Find reason to believe that the National Conservative Political Action Committee violated 2 U.S.C. § 434(b)(3)(A). Find reason to believe that the National Conservative Political Action Committee violated 2 U.S.C. § 434(b)(8). Find reason to believe the National Conservative Political Action Committee violated 2 U.S.C. § 434(b)(1). Take no action in the matter regarding an alleged violation of 2 U.S.C. § 434(b)(4)(H)(iii). Approve and send the attached letter with the General Counsel's Factual and Legal Analysis. Attachments Exhibit "A" Exhibit "B" Exhibit "C" Letter to Susan S. Hannegan with the General Counsel's Factual and Legal Analysis enclosed.

#### RAD STRUCTIONS ON REVERSE SIDE BEFORE COMPLETING

	PORTS ANAL	YSIS REFERRAL SH	آب	KAG	
DATE	9/15/30	ANALYST	Mark Kleinman	14K	
TO: Office of Gen	eral Counsel	TEAM CHIEF	Bobby Werfel	16 Y	
THROUGH: STAFF	DIRECTOR (SX)	COMPLIANCE RE	EVIEW A		
FROM: ASSIST	ANT STAFF DIRECTO	R FOR REPORTS AN	ALYSIS THE	•	
CANDIDATE/COMMITTI TREASURER: ADDRESS:	Susan S. Hamneg 1500 Milson Bou Arlington, VA	an Nevard, Suite 513	Action Committe	-	
AFFILIATE(S):	None				
ALLEGATION(S): Failu independent expenditu fashion. CONTINUED PAGE TO DATE INITIATED: 7-1	res in a timely	'E: 2 ሆ.S.C. 434(ር	o)(4)(H)(iii)AT	TACHMENT(S) #5	
MANNER IN WHICH REVIEW  Special Project	v DOTher:	): 		TACHMENT	
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cash-on-hand. Failure to report in		2 U.S.C. 434(b)(4)(H)(iii)	<b>#</b> 6
Failure to accurate outstanding debts a mounts paid to ex	rly. ly disclose and obligations, tinguish debts, ions under which duced for less than	2 U.S.C. 434(b)(8)	<b>₹6,</b> #12
RESULTS OF REVIEW:	RFAIs sent 6-3-80 Letter to Commission	ATTACHME on indicating ore time to respond 6-25-80	⊇T: - <b>f</b> 6 - <del>f</del> 8
•	RFAIs Second letter Response: 7-30-80		79 710 711
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	Audit Peport of the	Cormission 3-3-80	<i>;</i> "15

MEMORANDUM TO THE REFERRAL: NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE FROM: MARK KLEINIAN .

Under "Other Relevant Information" (Attachment #13), we have listed the problem relating to itemized contributions. It is placed there because it is not referrable under the Review and Audit Policy. We recommend, given the magnitude of the problem, over \$500,000 in previously unitemized contributions, that the Office of General Counsel, make it an allegation.

ATTACHMENT #1

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## TEDERAL ELECTION COMMISSION COMMITTEE INDEX OF DISCLOSURE BOCUMENTS - (C) (79-80)

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#### MÜN-FARTY RELATER

COMMITTEE	TORREST	KECEIFTS	EXFENDITURES			ŭF	HICROFILM
				COVERAGE	DATES PA	523	LOCATION
	LEQUEST FOR ADDITIONAL INFORMATION			1 40579	-31AU579	1	80FEC/157/2443
	REQUEST FOR ADDITIONAL INFORMATION 2ND				-31AUS79		30FEC/159/1020
	OCTOBER MONTHLY	201.624	228,775	1SEF.79	-305EF19		79FEC/140/2803
	OCTOBER MONTHLY - AMENDMENT	263,864	238,005	138777	30SEF79	23	80FEC/163/4574
	NOVEMBER MONTHLY	260,910	312+781	100779	-310LT79		79FEC/141/4216
	NOVEMBER MONTHLY - AMENDMENT	254,543	328,556	100179	-310CT79	150	80FEC/163/4623
	REQUEST FOR ADDITIONAL INFORMATION			100179	-3100179	1	SOFEE/157/2445
	DECEMBER MONTHLY	289.463	304,173	1 NO V 7 9	-36NDV79	68	79FEC/143/1812
	DECEMBER MONTHLY - AMENDMENT	237,483	304.173	140779	-3080279	67	30FEC/163/4774
	DECEMBER MONTHLY - AMENDMENT	299,323	367,137	1 NO 17 7	-30NÜV79 .	136	80FEC/164/2444
	REQUEST FOR ALBITIONAL INFORMATION			1 0 0 7 7	-3000779	2	80FEC/157/24
	REQUEST FOR ADDITIONAL INFORMATION 2MD				- <b>3</b> 0%0 <b>V</b> 79		80FEC/159/10.
	YEAR-END	277 • 138	269,423		-31DEC79		SGFEC/148/065
	TEAR-END - AMENDMENT	277+136	289,423		-31DEC79		BOFED/163/4451
	REQUEST FOR ADDITIONAL INFORMATION		•		-311:5079		30FEE/157/2450
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1DEC79	-31DEC79		80FEC/159/1024
1480	REQUEST FOR AUDITIONAL INFORMATION						80FEC/157/2457
	STATEMENT OF GREANIZATION - AMENDMENT			1484780			80FEC/156/1051
	STATEMENT OF GAGANIZATION - AMENDMENT			91/1/190			30FEC/157/3107
	STATEMENT OF ORGANIZATION - AMENDMENT			25.มนหลัง			BOFEC/158/3272
	MISCELLANEOUS REPORT			297NM20	TO FEC		80FEC/158/3479
	24 HOUR CONTRIBUTION NOTICE			1030130			80FEC/159/3310
	24 HOUR CONTRIBUTION NOTICE			1170530			80FEC/159/4404
	24 HOUR CONTRIBUTION NOTICE			1970780			BOFEC/150/5052
	STATEMENT OF GREANIZATION - AMENDMENT			26AUG60			80FEC/164/2447
	FERRUARY MONTHLY	2/2/523	244,076		-31 JAN80		80FEC/149/3633
	LEBRUARY MUSTHLY - AMENDMENT	272,5/3	244,076		-31JAN90		BOFEC/163/4513
	REQUEST FOR ADDITIONAL INFORMATION				-31 JANSO	_	80FEC/157/2453
	PEQUEST FOR ADDITIONAL INFORMATION 2ND				CBNAL 1E-		BOFEC/159/1026
	MARCH MONTHLY	375.689	353,432		-29FEB80		80FEC/150/4813
	HARCH MONTHLY - AMENDMENT	375,337	353,432		29FEB80		30FEC/163/4439
	AFRIL MONTHLY	309 <b>,4</b> 88 -	328,810		-31MAR80		80FEC/155/00 80FEC/155/10
	AFRIL MONTHLY - AMENDMENT		#55 A+6		-31MAR80		80FEC/164/21.
	APRIL MONTHLY - AMENDMENT - REQUEST FOR ADDITIONAL INFORMATION	309,488	328.810		-31MAR80 -31mar80		80FEC/157/2455
	FEGUEST FOR ALLITIONAL INFORMATION 2ND				-31MAR80		80FEC/159/1028
	MAY MUNTHER	272,415	258,650		-304FR80		80FEC/156/4498
	nar monther - amenument	2/2/413	2381039		30AFR30		30FEC/157/3535
	MAY MONTHLY - AMENDMENT	272+415	258,050		-30AFR80		80FEC/164/2253
	JUNE MONTHLY	377.635	379.677		-31MAYEO		BOFEC/150/3274
	JUNE MONTHLY - AMENDMENT	377, 255	379,677		-31MAY80		80FEC/164/2205
	JULY MONTHLY	407,952	385,156		20 JUNEO		BOFEC/161/5505
	JULY MONTHLY - AMENDMENT	407+952	385,156		- 30JUNSO		SGFEC/164/2223
	AUGUST HERTHLY	475,447	355,427		-31JUL80		80FEC/154/1050
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	TOTAL	4,753,153	0 4,530,302	Ů	:	2199	TOTAL PAGES

ATTACHMENT #2

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16 JL 1879



#### FEDERAL ELECTION COMMESSION MANAGEM DE BIM

Becti A. Cocil, Treasurer Betienal Conservative Political Action Committee \$500 Milson Boulevard, Suite \$13 Arlington, WA 82209

Page No. Cocil:

This letter is prompted by our interest in assisting committees what wish to comply with the Federal Election Compaign Act.
February Monthly, March Monthly &

During review of the <u>April Monthly</u> Report of Receipts and Expenditures, we noted that you omitted certain information or made apparent mathematical errors in certain entries. Attached is an itemization of the information requested.

Sincerely,

Orendo B. Porto

Orlando B. Potter Staff Director

Attachment FEC Form 12

#### PEDERAL ELL THIS I CE TELLEDA 1213 K Brown N W. Washington D.C. 2043

• 4

10: _	MATIONAL CONSERVATIVE POLITICAL	BATE: 36 JUL 879
_	ACTION CONTITO	- E.B. 100.; C00024687
ANDE	est for additional information for the xpenditures covering the period	February Monthly  THROUGH  THROUGH  THROUGH
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Please ;	provide the required data, as indicated (x):	•
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, <u> </u>		ng the responsibility to file a report to sign the original
	report. Please resubmit a signed copy of your nother: SEE PAGE FIVE	· po·

Your Initial submission(s), together with this request for additional information, has been made available for public inspection. The Commission urges you to file the additional submission(s) promptly to the above address. If you have any questions regarding this request, please call the Reports Analysis Division toll free at (800) 424-9530. The local Washington, D.C. telephone numbers are (202) 523-4048 (Senate, Non-Party), 523-4172 (House) or 523-1474 (Party).

Senzte filers should file their submission(s) with the Secretary of the Senzte, 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.

#### PLOCEAL IL FOTENS CONNICEDA BILL & Birnel, D. W. . . . Wellstree, D.C. 20463

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	grature:omittedinadequate  II CFR 104.12(a) requires each person haring report. Places remibints a signed copy of your repo SEE PAGE FIVE  Char:		ry to file a report	to sign the original

Your initial submission(s), together with this request for additional information, has been made available for public inspection. The Commission urges you to file the additional submission(s) promptly to the above address. If you have any questions regarding this request, please call the Reports Analysis Division toll free at (800) 424-9530. The local Washington, D.C. telephone numbers are (202) 523-4048 (Senate, Non-Party), 523-4172 (House) or \$23-1474 (Party).

Senste filers should file their submission(s) with the Secretary of the Senate, Office of Public Records, 119 D St., W.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.

#### FIDERAL ELECTION CONTINUES NO. 1025 K Super, N.M.

<b>TO</b> :	MATIONAL CONSERVATIVE	POLITICAL **	DATE:	JUL 1973	
•	ACTION COPHITTEE			0024687	
ANI	UEST FOR ADDITIONAL DI EXPENDITURES COVERING SUANT TO THE FEDERAL E	THE PERIOD	pril Monthly THR	OUCH	OF RECEIPTS
A PE	view of the report indicates the rate copy of this form with you	at additional information is r amended submission(s).	needed in order t	o be considered o	complete. Please
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` _ _*		inadequate ires each person having the signed copy of your report.		file a report to	sten the original

Your initial submission(s), together with this request for additional information, has been made available for public inspection. The Commission urges you to file the additional submission(s) promptly to the above address. If you have any questions regarding this request, please call the Reports Analysis Division toll free at (800) 424-9530. The local Washington, D.C. telephone numbers are (202) 523-4048 (Senate, Non-Party), 523-4172 (House) or 523-1474 (Party).

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- Bog: 5 of

MATHORAL CONCERNATIVE POLITICAL ACTION CONSISTEE RESILECT FOR ACCUTIONAL ENFORMATION Made First

#### All Records

Please clarify the circumstances of the in-kind contributions reported on Schedule B. Line 22c and the independent expenditures reported on Schedule E. Line 23. disclosed after the 1978 General Election.

Please be advised that in-kind contributions and independent expenditures should be reported on Schedule B, Line 22c, and Schedule E, Line 23, respectively, at the time that these expenditures were made on behalf of or against condidate(s). If these expenditures were also debts exact by your constitue, then these should be reported as a memo entry only on Line 22c and Line 23 respectively, of the Detailed Summary Page, in addition to being disclosed on Schedule C, Line 13.

Please be advised that the subsequent payments to extinguish these debts should be reported on Line 20a of the Detailed Summary Page and Schedule 8 and C accordingly.

Please amend your reports accordingly.

#### March Monthly

Please clarify the entry on Schedule A. Line 18a from MediAmerica for "Ment, meroxing and telephone cost" on 2-1-79 for \$1621.

#### March and April Monthly Reports

Your reports disclose Toan repayments to First American Bank of Yirginia on Schedule B. Line 21a. The Year End and February Monthly Reports, filed by your committee, which reported the receipts of the Toans, disclosed endorsers or guarantors of the Toans along with the amount of the Toans each guarantor was guaranteeing. As the principals are reduced by repayments to First American Bank of Virginia, so must the amounts guaranteed by each guarantor. Please amend your reports to supply this information.

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#### STEMIZED EXPENDITURES

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## FOR LINE 23, PEC FORM 8

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Mational Conservative Pol	itical Action Com	ittee	C0002468	7
Fell Name, Making Address and 219 Code	•	. 1	this a Separate Repo	
Mational Conservative Pol 1500 Wilson Blvd., Suite Arlington, VA 22209	<b>513</b>	ittee	nag on FEC Form 30	
Earlie Indipendent expenditures which properly in a	he appropries \$100 without a calendar	, Table 1		
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200				(1) Property (1) Coppers
Namerican Mailing Lists 7777 Leesburg Pike Palls Church, VA 22043	List Mental Expense	3-29-79	\$ 742.68	Williams - Senate MT
Corp.	List Rental Expense	3-29-79	\$ 511.43	Sonny Kane PA" 7
Mediamerica, Inc.	Production Services	3-29-79	\$2,190.82	Sonny Rane PA-7  (Kinnert   Doores
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ATTACHMENT #3

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TELECON TO THE FILE: NATIONAL CONSERVATIVE POLITICAL ACTION CONTITUE

FROM: MARK KLEIN AN

DATE: 8-7-79

RE: RFAIs M2,1B and 14.

I spoke with Becki Cecil, 522-2800, Treasurer. She stated that she was trying to file Audit amendments too. She will respond as soon as possible.

Becki Cecil, Treasurer 522-2500

ATTACHMENT #4

-

### National Conservative

1500 wilson blvd. suite 513 arlington, va. 22209 (703) 522-2000

'79 DEC 28 AN 11: \$8

December 27, 1979

Yederal Election Commission 1325 K St. WW Washington, DC 20463

Dear Sire:

I am writing in response to your letter of July 16 which contained several inquiries concerning items on the Mational Conservative Political Action Committee's (MCTAC's) February Monthly, March Monthly, and April Monthly Reports. I have done by best to answer these questions below:

#### All Reports -

On these reports, all expenditures which were allocated to candidates either as in kind or independent expenditures were reported to the commission as soon as the actual check to cover the expenditure was written. If the expenditure qualified to be listed on the debt schedule it was listed there in previous reports, and removed as specified when paid. I have never been instructed otherwise until now, and have continually tried to the best of my ability to comply with all provisions of the Federal Election Campaign Act. I will, however, keep your recommendations in mind to avoid future occurrences of this type.

#### March Monthly 1979 -

The losm repayment made on Schedule B line 21s was a payment on the losm which was endorsed by John T. Dolan on 12/14/78 and was reduced correctly on Schedule C line 13 page 10 of 15 (pages attached). I understand how it could have been misunderstood and will try to be more specific in the future concerning such things.

The entry on Schedule A line 18s dated 2/1/79 from Mediamerica was for a repayment to MCPAC for rent, meroxing, and telephone costs which were incurred on behalf of Mediamerica when they were in the position of sub-tenants to MCPAC.

#### April Monthly 1979 -

The two loan repayments made on Schedule B line 21s were for two different loans, though not clearly marked as such. The first was the final balance due on the \$5,000.00 loan endorsed by John T. Dolan on 12/14/78, and was shown as such on Schedule C, Line 13 page 9 of 15. (pages attached) The second payment was the first installment on the large loan taken

ATTACHMENT #5

The reporting problem is continuing, despite the Treasurer's assurance, that it would not occur again. It should be noted, that for purpose of analysis, the reports after the response of 12-27-79 were examined. The problem continues, primarily with the independent expenditures and not the in-kind contributions, as the committee does not incur debts for the in-kind contributions that have been reported.

The attached chart illustrates the committee's debt reporting problem, on their most recent reports.

For any given report, for example the Year End, the amount of outstanding debt that has been reduced, to a creditor/vendor during that reporting period, as shown on a debt schedule (Schedule C), should be less than or equal to the payments made to that creditor/vendor under operating expenditures (Schedule B). However, the chart indicates that the amount of debt that is being reduced, per report, is greater than the payments shown as operating expenditures on Schedule B. This would seem to indicate that the committee is dropping the difference because no comparable payments are being disclosed.

However, if the payments being made to a respective creditor/vendor, during a reporting period, allocated as both operating expenditures (Schedule B) and independent expenditures (Schedule E) are added together, then the amount of debt that has been reduced is generally less than or equal to the total payments (the last column of the chart), to a respective creditor/vendor.

This would seem to indicate that the payments on Schedule E, as reported by the cormittee, were for previous debts, and thus should have been disclosed at the time contracts were written, rather than when payments were made to extinguish debts.

Thus, the reporting problem from before, as described in the committee's response of 12-27-79 (Attachment #4) is probably continuing. Or else, the committee is reporting correctly and dropping a lot of debt (over \$30,000 as shown by the chart).

Vendor Report Debt Reduction to Payments made to Payments made to Total on Schedule C on Schedule B on Schedule E Payment Diversified Mailing Year- $\Gamma$ nd(12-1 to 12-31-79) 16097 (9947)5390) 14437\* Services February(1-1 to 1-31-80) 4450 (1351 3055) + 4436 March(2-1 to 2-29-80) 22454 (11459 + 3540) 19999\* Diversified Printing Year-End(12-1 to 12-31-79) 9762 (6494 4345) + 11339 February(1-1 to 1-31-80) Services 1153 (1) + 1155) 1155 March(2-1 to 2-29-39) 4304 . (2372 4225) 7097 Year-End(12-1 to 12-31-79) 30690 Richard A. Viguerie (25916 + 12766) February(1-1 to 1-31-00) 13066 + (14157 3715) 17. March(2-1 to 2-29-30) 63790 (52470 11315) 63785 Year-End(12-1 to 12-31-79) Prep, Inc. 22639 (9233)13450) 22633 February (1-1 to 1-31-80)5444 (492 + 4952) 5444 March(2-1 to 2-29-89) 18334 (11505 11999) 23494

7 7

(1/4996

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84907)

2299032

1Note: The Difference Between Debt Reduction to and Payments made to on Schedule B or 80722 is equal to the amount of debt which the committee has dropped, if they are currently reporting correctly.

2256831

2Note: The Difference Between Debt Reduction to and Total Payments which include the Payments made to on Schedule E is +4215.

Totals

\*Denotes Total Payments less than Debt Reduction including Payments made to on Schedule E, or apparent amount of debt dropped.

ATTACHMENT 45

4.



#### FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

JUN 3 1980

Susan S. Hannegan, Treasurer National Conservative Political Action Committee 1500 Wilson Blvd. Suite 513 Arlington, VA 22209

Identification No: C00024687

Reference: September Monthly Report (8-1-79 to 8-31-79)

Dear Ms. Hannegan:

This letter is prompted by the Commission's preliminary review of your September Monthly Report. The review raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act. An itemization of these areas follows:

- The ending cash balance of one report should be exactly the same as the beginning cash balance of the next. The August Monthly Amendment shows an ending balance of \$57,255 (Line 10) Column B, while the September Monthly report shows a beginning balance of \$40,712 (Line 7) Column A.

An amendment to your original report correcting the above problems should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,

Mark Kleinman

Reports Analyst

Reports Analysis Division

Comment of the second second

FEC FORM 3
REVISED
Junuary, 1978
Federal Election 2 minission
1325 K Street, P.W.
Washington, D.C. 20163

# REPORT OF RECEIPTS AND EXPENDITURES FOR A CANDIDATE OR COMMITTEE SUPPORTING CANDIDATE (S) FOR NOMINATION OR ELECTION TO FEDERAL OFFICE

(Except for Candidates or Committees Receiving Lederal Matching Lunds)

National Conservati		on Commit		4687
Address (number and street) Arlington, VA 2220		3 (0)	N/A tree Should, State/District	(1 apple 1924)
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ELECTION TO FEDERAL OFFICE New Impton, D.C. 23-11 Tie or Committees Receiving Federal Matching Funds) Name: Committees existing an extraordists to recurse contributions and make expanditures in son superate records with renorming to each effections. Mational Conservative Political Action Compande C00024687 Name of Caridians or Committee in hill 1500 Wilson BlvJ. **#513** Andrew (number and street)
Arlington, VA 22209 Office Sought, State/District (if applicable) City, State and ZIP Code Check if address is different then previously reported Year of Election 4 Type of Report Icheck appropriate boxes April 10 Quarterly Report (primary, general or convention) D July 10 Coursely Report October 10 Quarterly Report Thirtieth day report fol faction report! C Jamery 31 Annual Report (primary, general or convention) Monthly Report September in the Store of D Primary Election Coneral Election Primary and General Other lapsoid, runoff, sec.) SUMMARY OF RECEIPTS AND EXPENDITURES (Figures may be rounded to nearest dollar.) Column A m Period 8/1/79 This Period Calendar Year To-Date 10,490.01 40,712.10 7 Cash on hand at beginning of reporting period 216,692,27 1,153,471.88 257,404.37 1,163,961.89 1,092,685.71 186,128.19 71,276,18 71,276.18 10 Cash on hand at close of reporting period (Subtract line 9 from line 8a) Value of contributed items on hand to be liquidated (Attach itemized list)..........

Note: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. Section 437s or Section 441; (see reverse side of form).

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

(Typed Name of Treasurer or Candidate)

12 Debts and obligations owed to the Committee/Candidate (itemize all on Schedule C).

13 Debts and obligations owed by the Committee/Candidate (Itemize all on Schedule C) .

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(Signature of Treasurer or Candidate)

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#### FEDERAL ELECTION COMMISSION

WASHINGTON, DC 20463

JUN 3 1980

Susan S. Hannegan, Treasurer National Conservative Political Action Committee 1500 Wilson Blvd. Suite 513 Arlington, VA 22209

Identification No: C00024687

Reference: November Monthly Report (10-1-79 to 10-31-79)

Dear Ms. Hannegan:

This letter is prompted by the Commission's preliminary review of your November Monthly Report. The review raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act. An itemization of these areas follows:

- Your committee has made loans to <u>Jed Richardson For Congress</u> and <u>Friends of Denny Smith</u> on the expenditure schedule (Schedule B). When there are loans made by a committee, they should also be reflected on the debt schedule (Schedule C).

An amendment to your original report correcting the above problems should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,

Mark Kleinman

Reports Analyst

Reports Analysis Division

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

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Loan



#### FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

3 1980

Susan S. Hannegan, Treasurer National Conservative Political Action Committee 1500 Wilson Blvd. Suite 513 Arlington, VA 22209

Identification No: C00024687

Reference: December Monthly Report (11-1-79 to 11-30-79)

Dear Ms. Hannegan:

This letter is prompted by the Commission's preliminary review of your December Monthly Report. The review raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act. An itemization of these areas follows:

- Please clarify the entry on Schedule E, Line 23 to <u>Target '80</u> 11-21-79 \$2,200 for "Postage Expense". If this was a transfer to another political committee, then please so state and indicate whether this should be shown on Schedule B, Line 22.

In addition, please provide your relationship with Target '80, if any.

An amendment to your original report correcting the above problems should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,

Mark Kleinman Reports Analyst

Reports Analysis Division

# STEMIZED INDEPENDENT EXPENDITURES POR LINE 23, PEC FORM 3

Mational Conservative Political Action Counittee	C00024687
	is this a Separate Report by a Committee
Hational Conservative Political Action Committee 1500 Wilson Boulevard Arlington, VA 22209	Many on FEC Form Sat

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#### FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

#UN 3 1980

Susan S. Hannegan, Treasurer National Conservative Political Action Committee 1500 Wilson Blvd. Suite 513 Arlington, VA 22209

Identification No: C00024687

Reference: Year End Report (12-1-79 to 12-31-79)

Dear Ms. Hannegan:

This letter is prompted by the Commission's preliminary review of your Year End Report. The review raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act. An itemization of these areas follows:

- Please clarify the entry on Schedule E, Line 23 to Donna Le Porte, Anyone But Culver 12-27-79 \$1,773 for "Postage and Freight Charges". If this was a transfer to another political committee, then please so state and indicate whether this entry should be shown on Schedule B, Line 22.

In addition, please state your relationship with Anyone But Culver, if any.

- Your committee has made loans to <u>Don Lyon For Congress</u> and <u>Citizen's Advocate PAC</u>. When there are loans made by a committee, they should also be reflected on the debt schedule (Schedule C).

An amendment to your original report correcting the above problems should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,

Mark Kleinman

Reports Analyst

Reports Analysis Division

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SCHEDULS S way, 1978 Federal Election Commission 1325 K Sirset, N.W. Washington, D.C. 20463

ITEMIZED EXPENDITURES

Constinu Transfers Out, Contributions In-Kind, Loans, Lean Repayments and Returns Made) Supporting Lines 204, 21s, and 22s, 22b, and 22c of FEC FORM 3

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Name of Candidate or Committee in Full		
National Conservative	Political Action Commit	tee
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Vienna, VA 22180	Expenditure for:	12/18/19 4,000.00
, 55500	☐ Primary ☐ General ☐ Other	Ag. yr to date-(
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Citizen's Advocate PAC	1	day, year) ture the seried
Box 11628, Pioneer Station	Lom	12/27/79 4.000.00
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SCHEDULE C NEVISED January, 1978 Federal Election Commission 1325 K Street, NW. Washington, D.C. 20463



#### DESTS AND OBLIGATIONS



Supporting Line Numbers 12 and 13 of FEC FORM 3

(Indicate Primary or General Election for each Entry)

National Conservative Political Act	Tou want			
Full Name, Mailing Address and ZIP Code of Debtor at Creditor		Amount of Dripnel	Cumulative	Orners
National Defense Council	day, year)	Debt, Contract,	Payment	Between at
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Washington, DC 20037	1/10/78	l		
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D Primary 13 General D Other	<b>1</b> .	<b>s</b>	•	1.

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Skilled & Professional Political Action Committee 532 E. Shiawassee	day, year)	Debt, Contract, Agreement or Promise	Payment To Date	Outstanding Belance at Close of This Period
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NATURE OF OBLIGATION (Details of Debt)

#### Loan Outstanding

Ohio Conserva 16 East Broad	tive Politi		day, year?	Amount of Original Drbt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Door of This Period
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O Primary	1) General	5 Other		\$	\$	•

NATURE OF CALIGATION (Details of Dibit

Loan Outstanding

BCHEDULE C REVISED January, 1978 Federal Election Cort. Nation 1325 K Street, N.W. Washington, D.C. 20463

NATURE OF OBLIGATION (Details of Dobit).



#### DEBTS AND OBLIGATIONS



Supporting Line Numbers 12 and 13 of FEC FORM 3

Page 2 or 2 to

Line Hunter 12

Une Separate Schapeles for

Washington, D.C. 20463	(Indicate Primary or Gene	ral Election for ea	ich Entry)	each many	and book
Name of Candidate and Commi	tion in full tive Political Acti	on Consitt	40		
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Full Name, Mailing Address and ZIP Code of Debtor or Creditor  Priends of Denny Smith 3285 Balsam Dr. So. Salem. OR 97302		Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Complaine Payment To Date	Ovnunding Belance at Close of This Period
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Jed Richardson for Congress Principal Place of Business Amount of each Receipt Date (month) the Period dey . year ! P.O. Box 1059 Same Provo. UT 84602 Same 12/12/79 4,000.00 (loan repayment Check if Contributor is self-employed Place of for: ☐ Primary Apprepate Year-To Date . . . \$ General Other Futi Name, Mailing Address and ZIP Code Principal Place of Business Dete (month, Amount of each Receipt the Period day, year) Occupation Check if Contributor is self-employed Receipt for: ☐ General Other Aggregate Year-To Date . . . \$ Primary Amount of each Receipt Full Name, Mailing Address and ZIP Code Principal Place of Business Date (month day, year! this Period Œ Occupation Check if Contributor is self-employed Receipt for Other Aggregate Year To Date \$ D Primary ☐ General Amwint of tan Rect 5" Full Name, Mailing Address and ZIP Code Principal Place o' Date (month day, year! the Price Occupation Check if Contributor is self empoved

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#### FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463



Susan S. Hannegan, Treasurer National Conservative Political Action Committee 1500 Wilson Blvd. Suite 513 Arlington, VA 22209

Identification No: C00024687

Reference: April Monthly Report (3-1-80 to 3-31-80)

Dear Ms. Hannegan:

This letter is prompted by the Commission's preliminary review of your April Monthly Report. The review raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act. An itemization of these areas follows:

- Your debt schedule (Schedule D) discloses payments this period to: Richard A. Viguerie Co., American Mailing Lists and Medi-America of \$68,670; \$5,376; and \$30,486 respectively. However, a review of your expenditure schedules (Schedule B and Schedule E) discloses total payments, to the above-mentioned entities respectively, of only \$58,402; ... \$3,039; and \$23,703.

An amendment to your original report correcting the above problems should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,

Mark Kleinman Reports Analyst

Wal Di

Reports Analysis Division

SCHEDULE D (Revised 3/80)

21 TOTAL The Period Period

## DEBTS AND OBLIGATIONS Excluding Loans

Page 2 01
LINE NUMBER 10
(Use separate Schedules
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Full Name, Mailing Address and Zip Code of Debtor or Creditor	<u> </u>			
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Arlington, VA 22206	48965.34	10066.75	23166.60	35865.49
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C. Full Name, Mailing Address and Zip Code of Debtor or Creditor				·
Pesponse Graphics				
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Milling Services - Accts. Payable		30000		
D. Full Name, Mailing Address and Zip Code of Deptor or Creditor				
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Falls Church, VA 22043	147046.98	75513.13	68670.60	153889.
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F. Full flame, Mailing Address and Z.o. Sode of Debtor or Creditor	<u>'</u>			
Nature of Debt (Purposs):	1.*			
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SCHEDULE E

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# ITEMIZED INDEPENDENT EXPENDITURES

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Name of Committee (in Full)		
National Conservative Political	Action Committee	

A. Full Name, Melling Address and ZIP Code	Purpose of Dispursament	Dete Imonth,	Amount of Eath
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Arlington, VA 22206	Disbursement for: © Premary © General © Other (specify):	3/14/80	4528.00
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2936 Prosperity Ave. Pairfax, VA 22031	Disbursement for: © Primary © General © Other (specify):	3/14/80	800.00
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List Rental & Mailing Date Imports. Amount of Each day, year! Disbursament The Park Services Richard A. Viguerie, Co. Inc. Disburgament for: Cifrymany CiGene 3/21/80 1918.67 D Other (specify): B. Full Name, Mailing Address and ZIP Code Purpose of Disbursement Dese Limonth, Amount of Each day, year! **Districtment The Period** Porbes Temporaries Temporary Help 6569 Edsall Rd. Disbursement for: @Primary @General 3/24/80 1181.60 Springfield, VA 22151 C Other (specify): C. Fell Nome, Mailing Address and ZIP Code Purpose of Disbursement Dets Imports. Amount of Each day, year) Disbursement This Period C & P Telephone Co. Telephone Service 3/24/80 Disbursement for: @Primary @General 557.52 Other (specify): D. Full Name, Mailing Address and ZIP Code Purpose of Dispursement Dete (month, Amount of Each day, year) Disbursement This Pariod Capitol Hill Club Dues 300 First St. SE Disbursement for: @Primery @General 3/24/80 25.00 Washington, DC 20003 Other (specify): E. Foll Name, Making Address and ZIP Code Purpose of Disburgement Date (month, Amount of Each Acro Van Lines, Inc. day, year) Disbursement This Per storage expense 3/24/80 30.00 Disbursement for: Offremany General D Other (specify): F. Full Name, Mailing Address and ZIP Code Purpose of Disburgament Deta (month, Amount of Each International Fulfillment Corp. Storage expense day, year) Disbursement This Period 5010 46th Ave. 3/24/80 Disbursement for: OPrimary C General Hyattsville, MD 20781 24.00 Other (specify): G. Full Name, Mailing Address and ZIP Code Purpose of Disbursement Date Imonth, Amount of Each day, year) Disbursement This Per Telephone expense C & P Telephone Co. 3/24/80 Disbursement for: Dirimeny - General D Other (specify): 624.67 H. Full Name, Mailing Add ress and ZIP Code Purpose of Disbursement Date (month, Amount of Each Chambers Flower Center day, year) Disbursement This Period Contributor services 1600 Bladensburg Rd. NE 3/24/80 Disbursement for: OPrimary GGeneral Washington, DC 26.00 D Other (specify): I. Full Name, Making Address and ZIP Code Purpose of Dispursement Date Imonth, Amount of Exe Computer Comunications Industry day, year) Disbursement This Paned Office supplies Assoc. 3/24/80 Disbursement for: SPrimary SGeneral 1500 Wilson Blvd. **#512** 44.80 2 Other (medity) Arlington, VA 22209 SUSTOTAL of Discriments This Page (optional)

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National Conservative Political Action Committee	Balance Deplacing	Amount Industrial This Period	Payment This Pared	Ostorpacing Balance of Cross of This Foriod
A. Pull Nor a Mailing Address and Zo Code of Doctor or Ordner American Mailing Lists Comp., 7 7777 Leesburg Pike Palls Church, VA 22043	6653.07	(372.97)	5376.12	903.99
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8. Full Name, Mailing Assers and Zie Code of Discor or Cricher Berlin & Jones Co. Inc. P.O. Box 4294 New York, NY 10049	6249.11	3449.04	5439.11	4259.04
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#### National Conservative Political Action Committee

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Allington, va seeve	Disbursement for: O Pristery O General  O Other (specify):		4528.00
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Internal Revenue Service	Tax expense	3/14/80	Disbursement This Period
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G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursament	Date Imonth,	Amount of Each
	Storage expense	day, year)	Disbursement This Period
Acro Van Lines 7913 Yarnwood Ct.	Dispursement for: © Primary © General © Other (specify):	3/15/80	30.00
Springfield, VA 22153 H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month,	Amount of Each
Richard A. Viguerie Co	Direct Mail fees	day, year)	Disbursement This Period
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U. S. Postmaster	Postage on account	day, year)	Dispursement This Period
	Disbursement for: © Primery © General © Other (specify):	3/21/80	2,500.00
F. Full Name, Moiling Address and ZIP Code	Purpose of Disbursement	Date (month,	Amount of Each
American Mailing Lists Corp.	List Rental expense	day, year)	Dusursement This Period
and the second of the second second of the second s	Disbursement for: ©Primary ©General © Other (specify):	3/21/80	610.45
G. Full Name, Mailing Address and ZIP Code	Purpose of Dispursement -	Date (month,	Amount of Each
Computer Business Supplies	Printing Services	3/21/80	Disconsement This Paned
	Disburgement for: ©Primary ©General © Other (specify):		600.00
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month,	Amount of Each
Diversified Direct Inc.	Printing Services	3/21/80	Dishursement This Period
•	Disbursement for: © Primary © General D Other (specify):		611,30
1. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month,	Amount of Each
Diversified Mailing Services	Mailing Services	3/21/80	Disbursement This Period
	Disbursement for: © Primary © General © Other (specify):		2318.14
SUBTOTAL of Cisoursements This Page Contional 1			
TOTAL This Period flast page this line number only?			

Page 25 of 25 for (Use experses schedule(s) for each Estagory of the Detailed Summary Page)

Any information codied from such Reports and Statements may rea be sold air used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Commune (in Full)
National Conservative Political Action Committee

Printing Services   3/28/80   600.00	Each
R. Full Name, Mailing Address and ZIP Code  Red Rems, Mailing Address and ZIP Code  Red Rems, Mailing Address and ZIP Code  R. Full Name, Mailing Address	nis Period
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C. Pull Name, Mailing Address and ZIP Code Mt. Vernon Publishing Co. BLO North Fairfax St. Alexandria, VA 22314  D. Publishment for: Divinity Denormant of Determining Met., view Discursionant for: Divinity Denormant for: D	his Period
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Decument for: Driving Services    Description   Descriptio	Each
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D Other (specify):  G. Full Name, Mailing Address and ZIP Code  Purpose of Disbursement  Salaxy  Disbursement for: □ Primary □ General □ Other (specify):  H. Full Name, Mailing Address and ZIP Code  Returned checks & Bank charges  Disbursement for: □ Primary □ General □ Other (specify):  Disbursement for: □ Primary □ General □ Other (specify):  Disbursement for: □ Primary □ General □ Other (specify):  Disbursement for: □ Primary □ General □ Other (specify):  Date (month, Amount of the Code)  Disbursement for: □ Primary □ General □ Other (specify):  Date (month, Amount of the Code)	
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D Other (specify):  6. Full Name, Mailing Address and ZIP Code Purpose of Dispursement Date (month, Amount of	
day, year) Disbursement	
	This Pari
Dissumement for: © Primary © General   © Other (specify):	
SUBTOTAL of Dispursements This Page (optional)	

Note: In reviewing the April Monthly RFAI, for this referral,

I discovered an error with regards to Medi-America, and
thus, it should be ignored.

Mark Kleinman

ATTACHMENT #7

TELECON TO THE FILE: NATIONAL CONSERVATIVE POLITICAL ACTION CONSISTEE

FROM: MARK KLEINMAN

DATE: 6-24-80

RE: More time needed to respond

I spoke with Susan Harmegan 522-2800, Treasurer. She explained, to me, that she still needed more time to respond to PFAIs. She mentioned, that most of the PFAIs dealt with matters, before she had become Treasurer (the old Treasurer was Becki Burlingame).

I stated that we could not give an extension of time, but that she might want to send something to the Commission stating that they were in the process of responding.

Susan Hannegan, Treasurer 522-2800

ATTACHMENT #8

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National Consertive Political Action Committee 1500 wilson blvd. suite 513 arlington, va. 22209 (703) 522-2800 11 -1 June 25, 1980 Mark Kleinman Federal Election Commission Washington, D.C. Dear Mr. Kleinman, As I explained in our conversation in reference to your letters 9,0,0,5,1,5,8-5,7,7, dated June 3, 1980 concerning our monthly reports for August/ September 1979, November 1979, December 1979, Year End 1979, February 1980, and April 1980, it will be necessary for me to have an extention of time to look into each report. I have only been with NCPAC a short time and due to the fact that the reports in question date back as far as they do, I'm sure you understand the reasons for my request. will be filing ammendments to these reports one at a time over the next few months. I appreciate your co-operation and understanding in this matter. If you should have any questions, please feel free to contact me the number is (703) 522-2800. Sincerely, Susan S. Hannegen Susan S. Hannegan Treasurer SSH:ech

ATTACHMENT #9



#### FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

July 2, 1980

Susan S. Hannegan, Treasurer National Conservative Political Action Committee 1500 Wilson Blvd. Suite 513 Arlington, VA 22209

Identification No: C00024687

Reference: 1979 September, November, December Monthly Reports and Year

End Report: 1980 February, April Monthly Reports

Dear Ms. Hannegan:

This letter is to inform you that as of this date, the Commission has not received your response to our request for additional information, dated June 3, 1980. That notice requested information essential to full public disclosure of your Federal election financial activity and to ensure compliance with provisions of the Federal Election Campaign Act (the Act). A copy of our original request is enclosed.

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Mark Kleinman on our toll-free number (800)424-9530 or our local number (202)357-0026.

Sincerely

7 Thomas J. Haselhorst Assistant Staff Director

Reports Analysis Division

Enclosure

ATTACHNENT #10

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~

The committee has only responded to the September Monthly request regarding cash-on-hand. All other RFAIs have not been responded to, at all.

It should be noted, with regards to the two entries on Schedule E, "Target '80" and "Anyone But Culver", that if the transfers were to other committees, which the activity, in question, might trigger registration requirements for both "Target '80" and "Anyone But Culver".

# National Conservative RECEIVED Political Action Committee on action

1500 wilson blvd. suite 513 arlington, va. 22209 (703) 522-2800

July 30, 1980

RAND DELIVE.

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

Dear Sirs:

Upon reviewing the National Conservative Political Action Committee's (NCPAC's) FEC report for August 1979 wich covers the period from Aug. 1 through Aug 31, I have come accross several corrections which you should be made aware of.

There was an error in addition on the contributions for Schedule A, Line 11. The new total is \$217,823.27. I have also enclosed a new itemized contributor listing which replaces any listing you may have on file for this reporting period.

On Schedule B, Line 19 the total was in error and should be changed to \$137,492.78, this was due to a number of corrections which are as follows: Page 3 of 17 Prep, Inc. changed to \$9,459.73 and the Lewis Co. expenditure should not have been listed on this schedule, Page 6 of 17, Check to Olivetti Corn. was voided, Page 7 of 17 Daniel C. Beck changed to \$225.04, Page 11 of 17, Quality Inn Capitol Hill changed to \$586.40, page 16 of 17, MediAmerica, Inc. changed to \$6,516.80 and line 4 MediAmerica, Inc. (dated 8/29) changed to \$115.50 and on page 17 of 17 the returned checks and bank charges changed to \$400.84.

Schedule B Line 21 was also in error, an excenditure to MediAmerica, Inc. was previously listed on the wrong schedule, it was an In Kind Contibution to Mr. Ed King in the amount of \$4,165.80, this changes the schedule total to \$5,165.80.

Schedule E (Independent Expenditures) total should be changed to \$35,623.42. This is mainly due to the fact that most of these expenditures were listed on other schedules by mistake, the corrections are as follow: page 12 of 25, MediAmerica, Inc. line 3 \$623.22 for F. Church, Line 4 \$3,591.74 for A. Cranston and line 5 \$3,591.73 for J. Culver, Page 13 of 25, MediAmerica, Inc. Line 1 \$3,591.73 for B. Bayh and Line 2 for G. McGovern. Page 14 of 25, KBCI Television \$0.75 for F. Church and A.C. Printing changed to \$166.00, page 15 of 25 line 1, AFS Leasing changed to \$138.40, page 16 of 25 line 1, Idaho Statesman changed to \$452.25, page 17 of 25 Kalbus Office Equipment, line 3 changed to \$109.15, page 21 Of 25, Radio Shack changed to \$32.86. Also pages 23 of 25, 24 of 25 and 25 of 25 were completely added.

RECEIVED

'50 AUG 6 ... 3:3/

FEC Letter July 30, 1980 Page 2

The figures on the original summary page have all been changed due to the corrections listed above and a correction in the opening cash-on-hand figure on the January Report. I have enclosed a copy of the correct and complete report for your convience.

The second of th

Please accept this as an amendment to the August Monthly (8/1/79 - 8/31/79) Report. If there are any questions about these corrections, please feel free to call me.

Sincerely,

Susan S. Hannegan

Treasurer

RECEIVED

## REPORT OF RECEIPTS AND DISBURSEMENTS For a Political Committee Other Than an Authorized Committee 3 AUG 0 FF 3:31

(Summary Page)

1. Name of Committee (in Full)	4. TYPE OF REP	ORT (check appropri	ate boxes;
National Conservative Political Action Committee	(a) April	15 Quarterly Report	
	July 1	5 Quarterly Report	
Address (Number and Street)	Octob	er 15 Quarterly Repo	ort
1500 Wilson Blvd., Suite #513	Janua	ry 31 Year End Repo	n
	ي دامد 🗀	It Mid Year Report (	Non-election Year Only)
City, State and ZIP Code	Mont	hty Report for Aug	ust 1979
Arlington, Virginia 22209		th day report preced	(Type of Election)
Check if address is different than previously reported.		on on is	
2. FEC Identification Number C00024687	_		ring the General Election  State of
3. 9 This committee qualified as a multicandidate com-	☐ Term	ination Report	
mittee during this Reporting Period on (date)		eport an Amendment YES ====================================	NO
SUMMARY  5. Covering Period 8/01/79 Through 8/31/	79	Column A This Period	Column B Calendar Year-to-Date
6. (a) Cash on Hand January 1, 19.79			s 13,122.99
(b) Cash on Hand at Beginning of Reporting Period		57,255.39	A State of the second
(c) Total Receipts (from Line 18)		217,823.27	s 1,160,019.17
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)	ss	275,078.66	s 1,173,142.16
7. Total Disbursements (from Line 28)		183,282.00	s 1,081,345.50
8. Cash on Hand at Clore of Reporting Period (subtract line	7 from 5(d)) S	91,776.66	s 91,796.66
9. Depts and Obligations Oixed TO the Committee (Itemize all on Smedule Clor Schedule D)	s	15,252.60	
Debts and Obligations Owed BY the Committee     (Itemize all on Stinedule C or Schedule D)		330,815.02	
Bizertify that I have exemined this Report and to the best of my kno- et us true, correct and complete.	viedge and be inf		information, contact:
Susan S. Hannegan	•	Toli Free	Efection Commission ± 800-404-9530  2-503-4068

July 30, 1980

Type or Print Name of Treasurer

SIDNATURE OF TREASURER

# REPORT OF RECEIPTS AND DISBURSEMENTS. For a Political Committee Other Than an Authorized Committee 11: 52

(Summary Page) HAND DELIVERED

Leta: 202 123-4068

National Conservative		HEPORT (Inner) Jupio.	idte boxes:
Political Action Committee	1 _	April 15 Quarterly Report	
		uly 15 Quarterly Report	
Address (Number and Screet)		October 15 Quarterly Rep	ort
1500 Wilson Blvd. #513		lanuary 31 Year End Repo	
	_	July 31 Mid Year Report (	
City, State and ZIP Coile	<u> </u>	Manthly Report for Set	cember 1980
Arlington, Va. 22209		Twelfth day report preced	(Type of Election)
Check if address is different than previously reported.	_	election on ı	
2. FEC Identification Number C00024687	i	Chirtieth day report follow	•
3 D. This committive qualified as a multicandidate committee during this Reporting Period on Idate)		Termination Report his Report an Amendmen DXYES	
SUMMARY 9/1/79 Through	30/79	Column A This Period	Culumn B Calendar Year-to-Date
6. (a) Cash on Hand January 1, 1979			s <sup>13,122.99</sup>
(b): Cash on Hand at Deplaning of Reporting Pariod	· · · · · · · · · · · · · · · · · · ·	s 91,796.66 -	
(c: Total Receipts (from Line 18)	• • • • • • • • • • • • • • • • • • • •	\$ 263,864.74	·\$1,423,883.91
(d. Subtotil) (add lines 6(b) and 6(c) for Column A and lines 5(a) and 6(c) for Column 3)		s 355,661.40	s1,437,006.90
7. Total Dispursements (from Line 2B)	··········	s 236,005.32	\$1,317,350.82
B. Cash on Hand at Close of Reporting Period (subtract lin	e 7 from 5(a)1	s 119,656.08	15119,656.08
9. Debts and Obligations Divide TO the Committee (Itemia - all on Schedule C or Schedule D)		s 15,525.60	
10. Depts and Obligations Owed BY the Committee (Itemize all on Schedule Clor Schedule Dx		s 357,483.84	
		The same of the same of	

Susan S. Hannegan

# REPORT OF RECEIPTS AND DISBURSEMENTS For a Political Committee Other Than an Authorized Committee 0 15 15 P 4: 53

REQUEST O

(Su	mmary Page)	1	AND DELUMEN
1. Name of Committee (in Full)	. 4. TYPE OF REPO	PRT laneck approx	HIND DELIVE
National Conservative Political Action Committee	_	5 Quarterly Repor	-
		5 Quarterly Report	
Address (Number and Street) 1500 Wilson Blvd.	☐ Octob	er 15 Quarterly Rep	port
Suite #513	Januar 🔲 Januar	v 31 Year End Res	oon
<u> </u>			(Non-election Year Only)
City, State and ZIP Code	Month	ly Report for _O	ctoher 31,1979
Arlington, VA 22209	•	h day report prece	(Type of Election)
= Check if address is different than previously reported.	electio	r or	in the State of
2. FEC Identification Number	Tours	ith day report follo	wing the General Election
C00024687	on	in t	he State of
3. = This committee qualified as a multicandidate com-	☐ Term	nation Report	
mittee ouring this Reporting Period on (date)		port an Amendme YES :	nt? : NO
SUMMARY  5. Covering Period 10/1/79 Through 10/1	31/79	Column A This Period	Column 5 Calendar Year-to-Date
6. (a) Cash on Hand January 1, 19			s <sup>13,122.99</sup>
(b) Cash on Hand at Beginning of Reporting Period		19,656.08	
(c: Total Receipts (from Line 18)	s <sub>20</sub>	54.643.64	·\$1,688,527.55
(c) Subtotal (add lines 6(a)) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)	· ·		\$1,701,650.54
7. Total Dispursements (from Line 28)	s <sub>3</sub>	28,566.59	\$1,645,917.41
8. Cash on Hand at Close of Reporting Period (submatt lin		55,733.13	s 55,733.13
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D1	, <u>s</u>	15,252.60	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	s 2	95,009.71	
Ecertify that I have examined this Report and to the best of my ker it is true, correct and complete.	owerseanabelet		r information, contact:
Susan S. Hannegan			* Electron Commission

ATTACHTENT #11

The committee filed amendments changing the cash-on-hand, for the Report which was RFAIed. However, this resulted in throwing off the cash-on-hand totals of the subsequent reports. The committee did file amendments changing the appropriate cash figures through the December Monthly 1979, but the Year End Monthly has not been amended to account for the changes made on the December Monthly Amendment. Thus, the cash discrepancy is:

Pecember Monthly Amendment - ending cash-on-hand \$47,919
Year End Report - beginning cash-on-hand 37,544

Discrepancy 10,375

# T OF BECEIPTS AND DISSUIDS



Federal Elaction Commission Toll Free 800-424-9530

Local 202-523-4068

# REPORT OF RECEIPTS AND DISBURSEMENTS. For a Political Committee Other Than an Authorized Laby ED

1 4. TYPE OF REPORT LETECH Sporopriate Bornes

(Summary Page)

1. Name of Committee (in Full)

it is true, correct and complete.

Type or Print Name of Tressurer

SIGNATION OF TOP .....

Susan S. Hannegan

	National Conservative Political Action Committee	_	April 15 Quarterly Report July 15 Quarterly Report	
	Address (Number and Street) 1500 Wilson Boulevard Suite 513		October 15 Quarterly Repo January 31 Year End Repo July 31 Mid Year Report (I	n
-	City, State and ZIP Code Arlington, VA 22209		Monthly Report for NO	(Type of Election)
	Check if address is different than previously reported.		election on in Thirtieth day report follow	
2	FEC Identification Number C00024687	_	on in the	
3.	This committee qualified as a multicandidate com-		Termination Report	
	mittee during this Reporting Period on(date)	(b) Ist	his Report an Amendment X YES	? NO
_	SUMMARY	779	Column A This Period	Column B Calendar Year-to-Date
	SUMMARY  Covering Period 11/1/79 Through 11/3( (a) Cash on Hand January 1, 19 79			1
	Covering Period 11/1/79 Through 11/30		This Period	Calendar Year-to-Date
	Covering Period 11/1/79 Through 11/30  (a) Cash on Hand January 1, 19 79		This Period	Calendar Year-to-Date S 13,122,99
	Covering Period 11/1/79 Through 11/30  (a) Cash on Hand January 1, 19 79  (b) Cash on Hand at Beginning of Reporting Period		This Period  S 55,733.13	Calendar Year-to-Date S 13,122.99
6.	Covering Period 11/1/79 Through 11/30  (a) Cash on Hand January 1, 19/79  (b) Cash on Hand at Beginning of Reporting Period  (c) *Total Receipts (from Line 18)  (d) Subtotal (add lines 6(b)) and 6(c) for Column A and		This Period  S 55,733.13  S 299,323.75  S 355,056.88	S 13,122.99
7.	Covering Period 11/1/79 Through 11/30  (a) Cash on Hand January 1, 19/79  (b) Cash on Hand at Beginning of Reporting Period  (c) *Total Receipts (from Line 18)  (d) Subtotal (add lines 6(b)) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)		This Period  \$ 55,733.13 \$299,323.75 \$355,056.88 \$307,137.47	S 13,122.99    S 1,987,851.30   S 2,000,974.29
7. 8.	Covering Period 11/1/79 Through 11/30  (a) Cash on Hand January 1, 19/79  (b) Cash on Hand at Beginning of Reporting Period  (c) *Total Receipts (from Line 18)  (d) Subtotal (add lines 6(b)) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)  Total Disbursements (from Line 28)	7 from 6(d))	This Period  \$ 55,733.13 \$ 299,323.75 \$ 355,056.88  \$ 307,137.47 \$ 47,919.41	S 13,122.99   S 1,987,851.30   S 2,000,974.29   S 1,953,054.88
7. 8. 9	Covering Period 11/1/79 Through 11/30  (a) Cash on Hand January 1, 19/79  (b) Cash on Hand at Beginning of Reporting Period  (c) Total Receipts (from Line 18)  (d) Subtotal (add lines 6 b) and 6 (c) for Column A and lines 6 (a) and 6 (c) for Column B)  Total Disbursements (from Line 28)  Cash on Hand at Close of Reporting Period (subtract line Debts and Oblications Owed TO the Committee	7 from 6(d))	This Period  \$ 55,733.13 \$ 299,323.75 \$ 355,056.88 \$ 307,137.47 \$ 47,919.41 \$	S 13,122.99   S 1,987,851.30   S 2,000,974.29   S 1,953,054.88

FEC FORM 3 REVISED Federal Election & monissie 1325 K Street, N.W. Washington, D.C. 20463

TOR A CANDIDATE OR COMMITTEE SUPPORTING CANDIDATE(S) FOR NOMINATION OR ELECTION TO FEDERAL OFFICE

CC 15 P4: 50

(Except for Candidates or Committees Receiving Federal Matching

National Conservative Poli	tical Action Comm	1. <sub>1.D.</sub>	No. C0000246	87	
Name of Candidate or Committee (in full) 1500 Wilson Blvd. \$513	•				te/Committee
Address (number and street) Arlington, VA 22209		Otto	ce Sought, State/Orstri	ct Gf ap	plicable)
City, State and ZIP Code	Di Check if address is different than	n pr <b>evi</b>	ously reported.	•	Year of Election
4 Type of Report (check appropriate boxes)					
☐ April 10 Quarterly Report	ay report preceding		efection	י פ	• Fermination Report
July 10 Quarterly Report on	fidate) in the State of _			0 /	Amendment for:
October 10 Quarterly Report				_	
☐ Thirtiet	h day report following		election convention)		(which report)
Monthly Report on	in the State of				***
This is a report for Primary Election	☐ General Election ☐	Prima	iry and General	D Othe	r (special, runoff, etc.)
SUŅ	MMARY OF RECEIPTS AND				
5 Covering Period 12/1/79 Through 1:	2/31/79		Column A This Period		Column B Calendar Yew-To D
6 Cash on hand January 1, 19				31.5	\$ 10,490.
7 Cash on hand at beginning of reporting period		[	s 37,544.35		
8 Total receipts (from line 19)		1	s277,138.46		s 2,242,608.
(a) Subtotal (Add tines 7 and 6 for Column A and I	ines 6 and 8 for Column 81	- [	s314,682.81	• • • • •	<b>s 2,253,</b> 099.

1 certify that I have examined this Report and to the best of my knowledge and belief it is tope, correct and complete 1/31/80

Becki C. Burlingage

(Date)

9 Total expenditures (from line 25). . . . . . . . . . . . .

11 Value of contributed items on hand to be liquidated (Attach itemized list)...........

10 Cash on hand at close of reporting period (Subtract line 9 from line Ba)

13 Debts and obligations owed by the Committee/Candidate fiternize all on Schedule C1. . .

(Typed Name of Ticasurer or Co. Caucal

\$ 2,207,629.83 45,259.17

\$269,423.64

s 45,259.17

s 12,952.60 \$345,780.44 ATTACHMENT #12

Attached are subsequent reports to the April Monthly 1980 report, which have the same problem, as the previous reports. Listed are the vendors for which the payment this period on Schedule D is less than the total payments on the expenditure schedules of the respective reports (Schedule B and Schedule E). The payments should at least be greater than the amounts reported as being paid on Schedule D. Any discrepancies could suggest possible 2 U.S.C. 441b violations---- corporate contributions--- if the amounts were either dropped or the terms of a debt settlement not sufficient to the test of 11 CFR 114.10.

#### JUNE MONTHLY

Vendor	Payments This Period (Schedule D)	Payments Reported Expenditure Schedules (Schedule B and E)
Prep, Inc.	15,962	12,706
Metro Printing	6.365	4.310

SCHEDULE D (Revised 3/80)

## DEBTS AND OBLIGATIONS Excluding Loans

Page 2 2 50 Life Rouges 10 No seems bearing

National Conservative Political Action Committee	Overlanding Balance Bajinning This Paried	Amount Incurred This Paried	Payment This Paried	Outstanding Balance at Clear of The Period
Metro Printing & Mailing Account and Zip Code of Debtor or Coditor Metro Printing & Mailing 1200 Sterling Boulevard Sterling, VA 22170	11,157.84	1,472.33	6,365.84	6,265.33
Nature of Debt (Purpose): Printing Service: Accts Payable				
Mt. Vernon Publishing Co., Inc. 810 N. Fairfax Street Alexandria, VA 22314	2,696.51	2,407.10	1,508.83	3,594.78
Namer of Debt (Purpose): Printing Service: Accts Payable				
C. Full Name, Mailing Address and Zip Code of Debtor or Graditor Prep, Inc. 2611 Shirlington Road Arlington, VA 22206	27,692.31	19,389.77	15,962.23	31,119.85
Neture of Debt (Purpose): Printing/Typesetting: Accts Paya	ble 250			
D. Full Name, Meiling Address and Zip Code of Debtor or Creditor Response Graphics P. O. Box 92608-T Cleveland, OH 44190	5,484.13	-0-	2,000.00	3,484.13
Neture of Debt (Purpose): Supplies/Printing-Accts Payable		S. C.		
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor Richard A. Viguerie Co. 7777 Leesburg Pike Falls Church, VA 22043	127,596.5	32,631.0	7 46,640.	3 113,586.
Nature of Dubt (Purpose): Computer-list rental & mailing fees-Accts Payable				3 4 4
F. Full Name, Mailing Address and Zin Code of Debtor or Creditor Wiland & Associates 219 East Davis Culpeper, VA 22701		18,707.32	-0-	18,903.75
Natura of Debt (Purpose): Computer & Mail Handling Service-Accts Payable				
1) SUBTOTALS This Period This Page (optional)				176,953.6
21 TOTAL This Period (last page this line only)				262,216.20
3) TOTAL OUTSTANDING LOAKS from Schedule C liest page or	Nv)			•

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SCHEDULE O

### ITEMIZED INDEPENDENT EXPENDITURES

· 24 a 40 ...

(See Reverse Side for Instructions)

National Conservative Po Committee				024688
National Republican	Purpose of Expensiture	Cay, year)	Amount	Nume of Federal Canadata Supported or separate by stag
Congressional Committee	Travel Expense	5/2/80	3.46	Bayh U.S. Senate
Diversified Direct, Inc.	Printing	5/2/00	10 100	Support G Conne
c/o U.V.B. Box 179 Alexandria, VA 22209		3/2/80	3,411.07	Kennedy U.S. President
Reponse Graphics	Printing			Support & Oppose
P. O. Box 92608-T Cleveland, OH 44190	rrincing	5/2/80	1,000.00	Kennedy U.S. President
Prep., Inc.				☐ Succeers ② Occord
2611 Shirlington Road Arlington, VA 22206	Printing	5/2/80	1,000.00	Kennedy U.S. President
Prep., Inc.	Deimain			☐ Support (1) Coppose
	Printing	5/2/80	43.18	Churc
		entra de Para de la	**	U.S. Senate
rep., Inc.	Printing	5/2/80	43.18	Cranston U.S. Senate
			·	
SUBTOTAL of Itemized Independent Expenditure SUBTOTAL of Unitemized Independent Expenditu	•		5.500.89	Success Occord
removed a service of the service of	<b>⊌ree</b>			
or Denaity of Derjury I certify mat malindecencent in ware not made in cooperation, consultation, concepts or suggest on of any candidate or any authorized of and cardidate or authorized committee. Furthermore the funding of the notice the triancing of distinction, distributions the funding the suggest of distributions.	excend tures reported err with Cristing Committee or agent I Chese excenditures	Subscribed and is	morn to before me e	5 Cp. 3*
note a lin part of any campaign materials prepared being committee or their agent.	on, or recubilization In the candidate, his	Mr Commission	17-	

SCHEDULE 1

#### ITEMIZED INDEPENDENT EXPENDITURES

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(See Reverse Side for Instructions)

Full Name, Maung Address & ZIP Code		Dese importo.		24687
of Each Paves	Purpose et Expenditure	day, year)	Amount	Name of Federal Cardicals Subported or especial by an expenditure & effice sough
Prep., Inc.	Printing	5/2/80	\$ 43.18	Culver U.S. Senate
Prep., Inc.	Printing	5/2/80	43.18	McGovern U.S. Senate
			·	C Support & Octoon
Prep., Inc.	Printing	5/2/80	43.19	Bayh U.S. Senate
				☐ \$4000r1 💆 Copper
Mount Vernon Publishing Co., Inc. 810 N. Fairfax Street Alexandria, VA 22314	Printing	5/2/80	249.60	Bayh U.S. Senate
Mount Vernon Publishing Co., Inc.	Printing	5/2/80	249.60	Chruch U.S. Senate
•				05.000- 6 2000
Mount Vernon Publishing Co., Inc.	Printing	5/2/80	249.60	McGovern U.S. Senate
				Support E Ouge
	n		\$ 875.35	

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Date

NET-41 P. 8. E

SCHEDULS S

#### ITEMIZED INDEPENDENT EXPENDITURES

--- 34 a 40 ---

(See Reverse Side for Instructions)

Committee Full hama, Maring Accress & ZIP Code	Purpose of	Date impage.	Amount	THE TOTAL PROPERTY AND ADDRESS OF THE PARTY
of Each Payes	Extenditors	day, year)		home of Federal Canadasi succerted or opposed by p expenditure & office sough
Diversified Mailing Svc.	Computer Service &	5/23/80	\$ 122.37	Cranston U.S. Senate
	Mailing Service			☐ Support XI Occupa
Diversified Mailing Svc.	Computer Service	5/23/80	\$ 122.37	Culver U.S. Senate
	Mailing Service			[] Support ( ) Cooper
Diversified Mailing Svc.	Computer Service	5/23/80	\$ 122.36	Church U.S. Senate
·	Mailing Service			☐ Support
Diversified Mailing Svc.	Computer Service	5/23/80	\$ 122.36	McGovern U.S. Senate
	Mailing Service			[] Success   1 0000
Diversified Mailing Svc.	Computer Service	5/23/80	\$ 122.37	Bayh U.S. Senate
	Mailing Service			☐ Support <b>页</b> 0000
Prep., Inc.	Printing	5/23/80	\$ 253.70	Culver U.S. Senate
				[] Success 70 Ocea
al SUBTOTAL of Itemized independent Expenditures bi SUBTOTAL of Unitemized Independent Expenditure			\$ 865.53 \$	
E) TOTAL Independent Expenditures				1 8
nder behalte of berjuny it certify that the indecendent exp rent were not made in cooperation, consultation, concert quatt or suppestion of any candidate or any authorized co	mith, or at the	Subscribed an	d sworn to before me	1 mi cn st
such candicate or authorized committee. Furthermore, t dinot in-dire the financing of dissemination, distribution				•

SBULE 8

### ITEMIZED INDEPENDENT EXPENDITURES

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Page 35 a 40 pm

Boo Reverse Side for Instructions

National Conservative Po	litical Action		C00024	687
Futi hame, Maring Address & 21F Code of Each Payee	Parpure of Exponditure	Cets (month, day, year)	Amount	hame of Federal Candidate subcorrad or especially the expenditure & effice sought
Prep., Inc.	Printing	5/23/80	\$ 253.70	
Prep., Inc.	2-1			Support Di Oppose
	Printing .	5/23/80	\$ 253.71	Cranston U.S. Senate
Prop. Inc.				□ Support 10 Occord
Prep., Inc.	Printing	5/23/80	\$ 253.71	McGovern U.S. Senate
				☐ Success ☐ Occoss
Prep., Inc.	Printing	5/23/80	\$ 253.70	Bayh U.S. Senate
		ļ		Support Occopie
The Richard A. Viguerie Co.	Mail List Rental & Mail Fees	5/23/80	\$6,864.08	Kennedy U.S. Senate
EVA-Tone Soundsheets				□ Support X Opport
2051 Waukegan Road Deerfield, IL 60015	Production Cost	5/29/80	\$ 272.00	McGovern U.S. Senate
The second secon	the sales are a second contract of			□ Support D Oubone
SUBTOTAL of lismited independent Expenditue SUBTOTAL of Unitermited Independent Expenditues TOTAL Independent Expenditures	m.i		8120.90	
for penalty of perjuny I certify that the indecencent fin were not made in cooperation, consultation, co- sest or suggestion of any candidate or any authorities with cancidate or authorized committee. Furthermones involve the function	Cert with, or at the of committee or agent if the expenditures	Subscribed and	sworn to before me	\$
where or in part of any campa-gn materials precaved hoseign committee, or prest agent	Dy the candidate, his	Wy Commune		

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Page 12 of 19 to LINE NUMBER 19 to COMPANY Page 10 the Detailed Summary Page 1

Any information copied from such Reports and Scattements commercial purposes, other than using the name and address Name of Committee (in Full)	of any political committee to solicit contribu	utions from such e	ommittee.
National Conservative Politic	al Action Committee		
A. Full Name, Mailing Address and ZIP Code Diversified Mailing Services	Purpose of Disbursament Postage	Dets (month, day, year)	Amount of Each Disbursament This Re
·	Disbursement for: © Primary © General D Other (specify):	5/9/80	\$19000.00
American Mailing List Corp 7777 Leesburg Pike	Purpose of Disbursement Mail List Rental	Date (month, day, year)	Amount of Each Disbursament This Par
Falls Church, VA 22043	Disbursament for: © Primary © General © Other (specify):	5/9/80	600.00
C. Full Name, MaJung Address and ZIP Code VA Unemployment Commission Box 1358 Richmond, VA 23211	Purpose of Disbursement Unemployment Tax	Dete (month, day, year)	Amount of Each Disbursement This Per
D. Full Name, Mailing Address and ZIP Code	Disbursement for: DiPremary DiGeneral Di Other (specify):	5/9/80	199.65
VA Unemployment Commission	Purpose of Disbursement Penalty	Date (month, day, year)	Amount of Each Disbursement This Pe
	Disbursement for: © Primary © General © Other (specify):	5/9/80	30.00
Prep, Inc. 2611 Shirlington Road	Purpose of Dispursement Printing	Date (month, day, year)	Amount of Each Disbursement This Per
Arlington, VA 22206	Disbursement for: Different Different Control (Specify):	5/9/80	4595.56
Full Name, Mailing Address and ZP Code Netro Printing & Mailing Box 262 Sterling, VA 22170	Purpose of Disbursement Printing	Date (month, day, year)	Amount of Each Disbursament This Per
	Disbursement for: © Primary © General © Other (specify):	5/9/80	1687.00
Berlin & Jones Co., Inc. P. O. Box 4294 New York, NY 10049	Printing	Date (month, day, year)	Amount of Each Disbursement This Per
	Disbursement for: □Primary □ General □ Other (specify):	5/9/80	2784.36
H. Full Name, Mailing Address and ZIP Code Diversified Direct, Inc. c/o U.V.B. Box 179 Alexandria, VA 22314	Printing	Date (month, day, year)	Amount of Each Disbursement This Per 2539.95
Full Name Mailing Addison and 719 Code	Disbursement for: = Primary = General = Dither (specify):	-, -, 00	2339.93
Medi America, Inc. 1900 N. Beaugegard Street #12 Alexandria, VA 22311	Purpose of Dispursement Temporary Help	Date (month, day, year)	Amount of Eath Disbursement This Pc
	Disbursement for: EPrimary EGeneral  E Other (specify)	5/14/80	4565.00

#### ITEMIZED DISBURSEMENTS

Page 14 of 19 for LINE NUMBER 119 (Use separate schedulets) for each category of the Detailed Page 14 of \_ Summary Page)

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

Name of Committee (in Full)
National Conservative Political Action Committee

Fee Name Mading Address and ZP Code Diversified Mailing Service	Purpose of Dispursement	Dest Imports,	Amount of Each
Diversified Marring Service	Postage	day, year)	Disbursement This Perio
•	Disbursement for: Giftenery General Disbursement for: Giftenery General	5/16/80	\$17162.00
Full Nume, Mailing Address and ZF Code Diversified Mailing Service	Purpose of Disbursement Mailing Services	Date (month, day, year)	Amount of Each Disbursement This Perio
	Disbursement for: © Primary © General © Other (specify):	5/16/80	7219.29
Full Name, Mailing Address and ZP Code The Richard A. Viguerie Co. 7777 Leesburg Pike Falls Church, VA 22043	Purpose of Disburgement Mail List Rental- Computer Svc, Mail Fee Disburgement for: OPrimary OGeneral O Other (specify):	Date (month, day, year) 5/16/80	Amount of Each Disbursement This Perio 7823.03
Full Name, Mailing Address and ZP Code The Richard A. Viguerie Co.	Purpose of Disbursement Computer Service	Date (month, day, year)	Amount of Each Disbursement This Perio
	Disbursement for: © Primary © General © Other (specify):	5/16/80	18081.60
. Full Name, Mailing Address and ZIP Code American Mailing List Corp. 7777 Leesburg Pike	Purpose of Disbursement Mail List Rental	Date (month, day, year)	Amount of Each Disbursement This Perio
Falls Church, VA 22043	Disbursement for: @Primary @General @ Other (specify):	5/16/80	<b>379</b> .79
Full Name, Mailing Address and ZIP Code Prep. Inc.,	Purpose of Disbursement Printing	Dete (month, day, year)	Amount of Each Disbursement This Peri
Control of the second s	Disbursement for: © Primary © General © Other (specify):	5/16/80	5631.68
Berlin & Jones Co., Inc.	Purpose of Disbursement Printing	Date (month, day, year)	Amount of Each Disbursement This Peri
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	5/16/80	2391.72
f. Full Name Mailing Address and ZIP Code Diversified Direct, Inc.	Purpose of Disbursement Printing	Date (month, day, year)	Amount of Each Disbursement This Per
	Disbursement for: © Primary © General © Other (specify)	5/16/80	2652.91
. Full Name, Mailing Address and ZIP Code Mount Vernon Publishing 810 N. Fairfax Street	Purpose of Dispursement Printing	Date (month, day, year)	Amount of Eath Disbursement This Per
Alexandria, VA 22314	Disbursement for: EPrimary EGeneral	5/16/80	760.03

SCHEDULE D (Revised 3/80)

### DEBTS AND OBLIGATIONS Excluding Loans

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National Conservative Political Action Committee	Outstanding Belance Beginning This Period	Amount Insured The Period	Payment This Paried	Outstanding Belance at Close of This Period
Metro Printing & Mailing 1200 Sterling Boulevard Sterling, VA 22170	11,157.84	1,472.33	6,365.84	6,265.33
Printing Service: Accts Payable				
Mt. Vernon Publishing Co., Inc. 810 N. Fairfax Street Alexandria, VA 22314	2,696.51	2,407.10	1,508.83	3,394.78
Printing Service: Accts Payable				
Full Name, Mailing Address and Zip Code of Debtor or Creditor Prep, Inc. 2611 Shirlington Road Arlington, VA 22206	27,692.31			31,119.85
Printing/Typesetting: Accts Paya	ble 🚉			
P. O. Box 92608-T Cleveland, OH 44190	5,484.13	-0-	2,000.00	3,484.13
Supplies/Printing-Accts Payable				
E. Full Name, Mailing Address and Zio Code of Debtor or Creditor Richard A. Viguerie Co. 7777 Leesburg Pike Falls Church, VA 22043	i	32,631.0	7 46,640.	73 113,586
Nation of Debt (Purpose): Computer-list rental mailing fees-Accts Payable				·李·金德。
F. Full Name, Mailing Address and Zin Code of Debtor or Creditor Wiland & Associates 219 East Davis Culpeper, VA 22701	`	18,707.3	-0-	18,903.7
Nations of Debt (Purpose): Computer & Mail Handling Service-Accts Payable		in the		1000
1) SUBTOTALS This Period This Page (optional)		-,		176,953.6
2) TOTAL This Period (last page this line only)				
2) TO TAIL THIS PERIOD TUST PAGE THIS TIME ONLY!				

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

Name of Committee (in Full)

National Conservative Political Action Committee

in which is the state of the

tion the farminary and a

A. Full Name, Mailing Address and ZP Code Diversified Mailing Services	Purpose of Disbursament Postage	Dets (month, day, year)	Amount of Each Disbursement This Perior
	Disbursement for: © Primery @ General D Other (specify):	5/9/80	\$19000.00
B. Full Name, Mailing Address and ZP Code American Mailing List Corp 7777 Leesburg Pike	Purpose of Disbursement Mail List Rental	Date (month, day, year)	Amount of Each Disbursament This Perio
Falls Church, VA 22043	Disbursement for: © Primary © General © Other (specify):	5/9/80	600.00
C. Full Name, Mailing Address and ZIP Codes VA Unemployment Commission Box 1358	Unemployment Tax	Date (month, day, year)	Amount of Each Disbursement This Pend
Richmond, VA 23211	Disbursement for: © Primary © General © Other (specify):	5/9/80	199.65
D. Full Name, Making Address and ZP Code VA Unemployment Commission	Purpose of Disbursement Penalty	Date (month, day, year)	Amount of Each Disbursement This Perio
	Disbursement for: © Primary © General © Other (specify):	5/9/80	30.00
E. Full Name, Mailing Address and ZIP Code Prep, Inc. 2611 Shirlington Road	Purpose of Disbursement Printing	Date (month, day, year)	Amount of Each Dispursement This Peni
Arlington, VA 22206	Disbursement for: © Primary © General © Other (specify):	5/9/80	4595.56
F. Full Name, Mailing Address and ZP Code Metro Printing & Mailing Box 262	Purpose of Disbursement Printing	Date (month, day, year)	Amount of Each Disbursement This Peni
Sterling, VA 22170	Disbursement for: © Primary © General © Other (specify):	5/9/80	1687.00
G. Full Name, Mailing Address and ZIP Code Berlin & Jones Co., Inc. P. O. Box 4294	Purpose of Disbursement Printing	Date (month, day, year)	Amount of Each Disbursement This Person
New York, NY 10049	Disbursement for: "Primary "General" Dother (specify):	5/9/80	2784.36
H. Full Name, Mailing Address and ZIP Code Diversified Direct, Inc. c/o U.V.B. Box 179 Alexandria, VA 22314	Purpose of Disbursement Printing Disbursement for: SPrimary Sceneral	Date (month, day, year) 5/9/80	Amount of Each Disbursement This Pend 2539, 95
1. Full Name, Mailing Address and ZIP Code	D Other (specify): Purpose of Dispursement	Date (month,	Amount of Eath
Medi America, Inc. 1900 N. Beaugegard Street #12 Alexandria, VA 22311	Temporary Help  Disbursament for: EPrimary EGeneral  Doner (specify)	5/14/80	Disbursement This Person

#### SCHEDULE B

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### ITEMIZED DISBURSEMENTS

Page 11 of 19 tor
LINE NUMBER 19
(Use supersta schedulets) for each
Estapory of the Detailed
Summary Page)

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

National Conservative Political Action Committee

A. Full Name, Meiling Address and ZIP Code Metro Printing & Mailing 120 S. Sterling Boulevard	Printing	Date (month, day, year)	Amount of Each Disbursement This Paris
Sperling, VA 22170  B. Full Name, Mailing Address and ESP Code	Disturpment for: © Primary © General O Other (specify):	5/2/80	\$2134.92
Diversified Mailing Service 7777 Leesburg Pike Falls Church, VA 22043	Purpose of Disbursement Mailing Services  Disbursement for: O Primary O General O Other (specify):	Date (month, day, year) 5/2/80	Amount of Each Disbursement This Perio 6500.00
Color Graphics Inc. 1801 Underwood Boulevard Delran, NJ 08075	Printing	Dete (month, day, year)	Amount or Each Disbursement This Period
D. Full Name Mailing Address and 710 Co.	Discurrement for: © Primary © General © Other (specify):	5/2/80	715.00
East Union Avenue	Purpose of Disbursement Printing	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZSR Code	Disbursement for: © Primary © General © Other (specify):	5/2/80	2005.58
H. G. Smithy Property Co 811 15th Street NW Washington, DC 20005	Purpose of Disbursement Rent	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Disbursement for: © Primary © General © Other (specify):	5/2/80	2810.25
H. G. Smithy Property Co.	Purpose of Disbursement Rent	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Disbursement for: © Primary © General © Other (specify):	5/2/80	300.00
U. S. Postmaster Ben Franklin Station Washington, DC 20044	Purpose of Dispursement Postage	Date (month, day, year)	Amount of Each Disbursement This Perior
	Disbursement for: DPrimary DGeneral   D Other (specify):	5/6/80	2500.00
First American Bank of VA 1501 Wilson Boulevard ARlington, VA 22209	Payroll Deposit	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: © Primary © General © Other (specify):	5/7/80	1942.98
Diversified Mailing Service 7777 Leesburg Pike Falls Church, VA 22043	Computer Services & Mailing Services	Date (month, day, year)	Amount of Earn Disbursement This Perica
	Dimusement for: EPriman EGeneral	5/9/80	6653.85
SUBTOTAL of Dispursements This Page (pational) TOTAL This Period list days this line number only)			25.562.58

SCHEDULE B

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#### ITEMIZED DISBURSEMENTS

Page 15 of 19 for LINE NUMBER 19 (Use separate schedule(s) for a category of the Detailed Summary Page)

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

Name of Committee (in Full)

National Conservative Political Action Committee

Composition Systems, Inc. 1011 Arlington Boulevard	Purpose of Disbursment Type Setting	Dets (month, day, year)	Amount of Each Disbursament This Ps
A 1	Disbursement for: © Primery © General © Other (specify):	5/16/80	\$ 273.52
American Mailing List Corp	Purpose of Disbursament Mail List Rental	Date (month, day, year)	Amount of Each Disbursament This Pe
	Disbursament for: © Primary © General © Other (specify):	5/21/80	33.41
Hedi America, Inc.	Purpose of Disburgament Printing, Mail Serv.	Date (month, day, year)	Amount of Each Disbursement This Pa
,	Disburgement for: Diffriency DiGeneral Di Other (specify):	5/23/80	1810.71
D. Full Name, Mailing Address and ZIP Code Bryan Wirwicz	Purpose of Disbursement Payroll	Date (month, day, year)	Amount of Each Disbursement This Pe
	Disbursement for: ©Primary ©General © Other (specify):	5/23/80	64.99
E. Full Name, Mailing Address and ZIP Code Bryan Wirwicz	Purpose of Disbursement Postage & Travel Reimbursement Disbursement for: Drivnery DGeneral	Date (month, day, year) 5/23/80	Amount of Each Disbursement This Pi 7.96
F. Full Name, Mailing Address and ZP Code Diversified Mailing Sevice	Purpose of Disbursement Mailing Service & Computer Expense Disbursement for: ©Primary □ General © Other (specify):	Date (month, day, year) 5/23/80	Amount of Eac Disbursament This F 1437, 04
G. Full Name, Mailing Address and ZIP Code Metro Printing & Mailing Ser. Box 262	Printing	Date (month, day, year)	Amount of Eac Disbursement This I
Sterling, VA 22170	Disbursement for: DPrimary DGeneral D Other (specify).	5/23/80	489.50
H. Full Name, Mailing Address and ZIP Code The C&P Telephone Co. P. O. Box 27272	Purpose of Disburstment Telephone Expenses	Date (month, day, year)	Amount of Eac Disbursement This
Richmond, VA 23272	Disbursement for: ©Primary © General © Other (specify)	5/23/80	1307.62
The Richard A. Viguerie Co.	Purpose of Dispursement Mail Fee	Date (month, day, year)	Amount of Ea. Disbursement This
	Disbursement for: "Primary "General Diner (specific)"	5/23/80	1435.92

#### JULY MONTHLY

Vendor	Payments This Period (Schedule D)	Payments Reported Expenditure Schedules (Schedule B and E)
Prep, Inc.	21,028	11,803
Diversified Direct, Inc	17,704	16,653
Berlin & Jones, Inc.	6,563	5,000
Response Graphics	3,484	2,483

SCHEDULE D (Revised 3/80)

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### DEBTS AND OBLIGATIONS Excluding Loans

Page 2 of 2 for LINE NUMBER 9 (Use seconds Scheduler for each numbered line

Action Committee	Outstanding Balance Beginning This Period	Amount Insured This Pariod	Payment This Period	Outstanding Belance at Closs of This Fored
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Mt. Vermon Publishing Co. 810 N. Fairfax Street Alexandria, VA 22314	3,594.78	1,300.00	2,341.58	2,553.20
Printing Services: Accts. Payable		A Company	4	4 11 11
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Prep, Inc. 2611 Shirlington Road Arlington, VA 22206	31,119.85	10,602.39	21,028.94	20,693.30
Nature of Dec: (Purpose):				
Typing Typesetting: Accts. Payable			1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	
C. Full Name Mailing Address and Zio Code of Debtor or Creditor Resmonse Gramhics P.O. Box 92608-T Cleveland, Ohio 44190	3,484.13	-0-	3,484.13	-0-
Nature of Dect (Purpose): Printing: Accounts Payable				
D. Full Name, Mailing Address and Zip Code of Deptor or Creditor				
Richard A. Viguerie Co., Inc. 7777 Leesburg Pike Falls Church, VA 22043	113,586.84		85,313.17	60,236.58
Neturn of Dub: (Purpose): Mail Fees and Mail List Rental : Accounts Payable				
E. Full Name, Mailing Address and Zio Code of Dector or Creditor		1		1
Wiland & Associates 219 East Davis Street Culpeoer, VA 22701	18,903.74	-0-	8,851.09	10,052.65
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SCHEDULE B

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#### ITEMIZED DISBURSEMENTS

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Mational Conservative Politic	al Action Committee		
. Full Harrs, Malling Address and ESP Code	Purpose of Disburgament	Dow teams.	Amount of Each
First American Bank 1501 Wilson Blvd.	Payroll Tax Deposit	day, yearl	Oldunament This Park
Arlington, Va. 22209	Disburyament for: © Primary © General © Other (seecify):	6/4/80	1,978.62
, Full Harms, Mailing Address and ZP Code	Purpose of Disbursament	Des teoriti,	Amount of Esch
Candice Taw 7401 Grace	Reimbursment Office Supplies Debursment by: Officery Officery	day, year)	Debursoment This Pari
Springfield, Va. 22158	© Other (specify):	6/6/80	10.40
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The Richard A. Viguerie 7777 Leesburg Pike	CO. Mail List Rental	day, year)	Disbursement This Per
Falls Church, Va. 22043	Disbursement for: ©Primary ©General © Other Isoscifyt:	6/6/80	7,000.00
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Arlington, Va. 22206	Disbursement for: DPrimary 2 General D Other (specify):		2,123.04
. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Data Imonth,	Amount of Each
Tri-State Envelope Corp. 6900 Faigle Road	Printing & Supplies	GSV. YOU'	Disbursement This Pa
Beltsville, Nd. 20705	Disbursement for: 3 Primary 3 General 3 Other (specify):	6/6/80	324.62
C. Full Name, Mailing Address and ZIP Code	Purpose of Dispursement	Date (month,	Amount of Exch
IBM Corporation	Deposit for Purchase of Typewritter	day, year)	Disbursement This Pe
	Disbursament for: © Primery © General © Other (specify):	6/11/8	164.25
Full Name, Mailing Address and ZIP Code	Purpose of Dispursement	Date Imonth,	Amount of Each
Susan S. Hannegan 8506 Inyo Court	Reimbursment-Office Supplies	day, veer)	Disbursement This Pr
Alexandria, Va. 22309	Disbursement for: Efficiency Eigeneral	6/11/8	0 7.93

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National Conservative Pol	itical Action Co-	mirea		
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of East Payor	Esperant	day, years	Amquat	Name of Feotral Candicate subparted or apposed by she expendent & office lought
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SCHEDULE D (Revised 3/80)

#### DEBTS AND OBLIGATIONS Excluding Loans

Page 1 of 2 10 LINE NUMBER 10 (Use separate Schedules for each numbered line)

National Conservative Political Action Committee Action Action Action Committee Action	Name of Committee (in Full)				
Full Name, Naming Andreas and Zio Code of Debiase or Creditor   American Mailing List   T777 Leesburg Pike   929.96   -0-   705.13   224.83     Pagents of Diets (Purpose):   Mail List Rental : Accounts Payable     Fall Hame, Mailing Addreas and Zio Code of Debiase or Creditor     Berlin & Jones Co., Inc.   P.O. Box 4294   10,949.38   10,856.95   6,563.00   15,243.33     New York, N.Y.   10049   10,949.38   10,856.95   6,563.00   15,243.33     New York, N.Y.   10049   10,949.38   10,856.95   6,563.00   15,243.33     Nerver of Diets (Purpose):   Printing Services : Accounts Payable     Finiting Services : Accounts Payable     Pill Name, Nating Asserss and Zio Code of Debiase or Creditor     Diversified Mailing Services : Accounts Payable     D. Full Name, Nating Asserss and Zio Code of Debiase or Creditor     Diversified Mailing Services : Accounts Payable     D. Full Name, Nating Asserss and Zio Code of Debiase or Creditor     Diversified Mailing Services : Accounts Payable     E. Full Name, Nating Asserss and Zio Code of Debiase or Creditor     MediAmerica, Inc.     1900 N. Beauregard Street #12   3,081.06   -0-   3,081.06   -0-     Alexandria, VA 22311     Nature of Debt (Purpose):     Production Services : Accets. Payable     F. Full Name, Nating Addres and Zio Code of Debtase or Creditor     Neture of Debt (Purpose):     Production Services : Accets. Payable     F. Full Name, Nating Addres and Zio Code of Debtase or Creditor     Nature of Debt (Purpose):     Production Services : Accets. Payable     F. Full Name, Nating Addres and Zio Code of Debtase or Creditor     Nature of Debt (Purpose):     Production Services : Accets. Payable     F. Full Name, Nating Addres and Zio Code of Debtase or Creditor     Nature of Debt (Purpose):     Production Services : Accets. Payable     F. Full Name, Nating Address and Zio Code of Debtase or Creditor     Nature of Debt (Purpose):     Production Services : Accets. Payable     F. Full Name, Nating Address and Zio Code of Debtase or Creditor     Production Services : Acce	National Conservative Political	Balance Beginning	Incurred	This	Belance at Close
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Any information counsel from such Placers and Statements may not be sald or used by any parson for the purpose of selecting contributions or far cial purposes, other them using the name and address of any political ears e of Committee (in Full) Maticanl Conservative Political Action Committee Person of Distancement A. Full Harm, Mailing Address and ZIP Code Character Institute of day, year's Sedan & Herge Legal Services 7600 Old Springhouse Road PRINCE OF THE PRINCE OF GROOM McLean, Virginia 22102 6/19/80 1,824.82 O Other Issuedly): B. Fell Russe, Making Address and ZIP Cods Purpose of Distruction Com Lennate Amount of Each was The Park Mail List Rental 40. American Mailing List Corp. Disbursement for: @Printery @Gone 6/20/80 90.78 Other (specify): C. Full Home, Mailing Address and ZIP Code Purpose of Disbursament Date (mural) Amount of Each Composition Systems, Inc. Typesetting dry, year) 1011 Arlington Blvd . Disbursement for: Officery OGeneral Arlington, VA 22209 6/20/80 380.22 Other (specify): O. Full Home, Mailing Address and ZIP Code Purpose of Disbursement Date (month, Amount of Each day, year) Disbursement This Period Diversified Mail Marketing Computer & Mail Services 6/20/80 2,143.21 Disbursement for: OPrimary OGeneral O Other fapecity): E. Full Name, Mailing Address and ZIP Code Purpose of Disbursament Date (month. Amount of Each day, year) arranteer This Pa Diversified Mail Marketing Postage 6/20/80 20,468.00 Disbursement for: Pfrimary DiGeneral Other (specify): F. Full Hams, Mailing Address and ZIP Code Purpose of Disburser Case (month. Amount of Each Computer Serv., Mail Fees day, year) Disbursament This Period Richard A. Viguerie Co., Inc. and Mail List Rental Disbursement for: © Primary © General 6/20/80 8,478.19 Other (specify): G. Full Name, Mailing Address and ZIP Code Purpose of Disbursement Date Imonth, Amount of Each day, year) Disburgament This Park Diversified Direct, Inc. Printing Disbursement for: Offrimary CiGeneral 6/20/80 1,610.10 ☐ Other (specify): H. Full Name, Mailing Address and ZIP Code Purpose of Disbursement Date (month, Amount of Each day, year) Deburgement This Period Mt. Vernon Publishing Printing 810 North Fairfax Street Disbursement for: 3 Primary 3 General 6/20/80 454.74 Alexandria, VA 22314 S Other (specify): 1. Full Name, Marling Address and ZIP Code Purpose of Disbursement Date Month. Amount of Each Batching & Caging and dev. year) Wiland & Associates, Inc. Computer Service 219 East Davis Street Dipursement for: Emmany EGeneral 6/20/80 5,449,54 Culpener, VA 22701 = Other (specify) 40 899

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SCHEDULE D (Revised 3/80)

# DEBTS AND OBLIGATIONS Excluding Loans

Page 1 of 2 100 LINE NUMBER 100 (Use separate Schedules for each numbered line)

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## ITEMIZED INDEPENDENT EXPENDITURES

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## ITEMIZED INDEPENDENT EXFENDITURES

Page 28 or 43 Page

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National Conservative Poli	tical Action Co	mmittee	C00024687			
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## ITEMIZED INDEPENDENT EXPENDITURES

Page -20 or 43 page

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Page 36 01 43 Page

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Diversified Direct, Inc.	Printing	6/27/80	3,200.00	Reagan President	
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MediAmerica, Inc.	Mailing Services and Production Cost	6/27/80	211.40	Church U.S. Senate	
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SCHEDULE D (Revised 3/80)

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# DEBTS AND OBLIGATIONS Excluding Loans

Page 2 of 2 for LINE NUMBER 9 (Use separate Echequies for each numbered line)

National Conservative Political Action Committee	Outstanding Balance Beginning This Period	Amount Insurred This Parced	Payment Thu	Outstanding Belongs at Close
A. Fut: Name, Marting Address and Zio Code of Deptor or Creditor	This review	This Pariod	Pariod	of This Period
Mt. Vernon Publishing Co. 810 N. Fairfax Street Alexandria, VA 22314	3,594.78	1,300.00	2,341.58	<b>2,553.2</b> 0
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8. Full Name, Mailing Address and Zio Code of Debtor or Oraditor	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1			1 2
Prep, Inc. 2611 Shirlington Road Arlington, VA 22206	31,119.85	10,602.39	21,028.94	20,693.30
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Resmonse Granhics P.O. Box 92608-T Cleveland, Ohio 44190	3,484.13	-0-	3,484.13	-0-
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D. Full Name, Mailing Address and Zio Code of Deptor or Creditor	i			
Richard A. Viguerie Co., Inc. 7777 Leesburg Pike Falls Church, VA 22043	113,586.84	31,962.91	85,313.17	60,236.58
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E. Full Name, Mailing Address and Zo Code of Dector or Creditor Wiland & Associates 219 East Davis Street Culpeper, VA 22701	18,903.74	-0-	8,851.09	10,052.65
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F. Full Name, Mailing Address and Zip.Code of Debtor or Creditor				
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2) TOTAL This Period (last page this line only)				140,973.05
3) TOTAL OUTSTIDING LOANS from Schedule C (lest page of	n(y)			
4) ADD 2) and 3) and carry forward to appropriate line of Summa	y Page lisst page on	ly)		1

HEDULE E

# ITEMIZED INDEPENDENT EXPENDITURES

Page 19 of 43 page

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National Conservative Pol	itical Action (	Committe	C0002468	27
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SCHEDULE E

#### ITEMIZED INDEPENDENT EXPENDITURES

--- 24 or 43 ---

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National Conservative Pol:	itical Action Com	ittee	C0002468	<i>7</i>			
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Medi America, Inc.	Printing	6/13/80	. 94	Church U.S. Senate			
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desponse Graphics	Printing	6/13/8	1,155.19	Kennedy President			
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The Richard A. Viquerie Co.	Computer Serv- ices & Direct Mail	6/13/8	0 2,617.95	Kennedy President			
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or such cand day or acting read of dissemination distri- dishing involve the name ng of dissemination distri- in whole or in bart of any campaign materials prepar campaign committee, or their agent.		My Commission expires					

Date

ATTACHMENT #13

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## NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE --- "ITEMIZED COMPRIBUTIONS REPORTING PROBLEM"

Report	Total Contributions	Itemized Contributions
September Monthly 1979(8-1-79 to 8-31-79)	216,692	900
September Monthly Amendment - Filed 8-27-80	216,919	68,504
October Monthly 1979(9-1-79 to 9-30-79)	260,195	850
October Nonthly Amendment - Filed 8-15-80	262,435	36,859
November Monthly 1979(10-1-79 to 10-31-79)	259,440	56,372
November Monthly Amendment - Filed 8-15-80	263,698	52,942
December Monthly 1979(11-1-79 to 11-30-79)	288,093	0
December Nonthly Amendment - Filed 8-26-80	297,954	43,449
Year Fnd Report 1979(12-1-79 to 12-31-79)	270,050	0
Year End Amendment - Filed 8-15-80	270,050	74,511
February Monthly 1980(1-1-80 to 1-31-80)	263,568	0
February Monthly Amendment - Filed 8-15-80	263,568	49,192
March Fonthly 1980(2-1-80 to 2-29-89)	375,689	0
March Monthly Amendment - Filed 8-15-30	<b>375,</b> 639	45,157
April Monthly 1980(3-1-80 to 3-31-80)	309,488	0
April Monthly Amendment - Filed 8-25-80	309,488	41,415
May Monthly 1980(4-1-80 to 4-30-80)	271,399	0
May Monthly Amendment - Filed 8-25-80	271,399	64,305
June Monthly 1980(5-1-80 to 5-31-80)	375,907	0
June Monthly Amendment - Filed 8-25-80	375,907	51,525
July Nonthly 1980(6-1-80 to 6-30-80)	. 407,062	0
July Monthly Amendment - Filed 8-25-80	407,062	54,178
August Monthly 1980(7-1-80 to 7-31-80)	472,977	0
NO AMENDMENT FILED YET REAL PREPARED	•	

Totals:

3,297,589

523,965 (not previously itemized)

ATTACHMENT #14



#### FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Susan S. Hannegan, Treasurer National Conservative Political Action Committee 1500 Wilson Blvd. Suite 513 Arlington, VA 22209

Identification No: C00024687

Reference: August Monthly Report (7-1-80 to 7-31-80)

Dear Ms. Hannegan:

This letter is prompted by the Commission's preliminary review of your August Monthly Report. The review raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act. An itemization of these areas follows:

-The amount on the Detailed Summary Page, Line 11(a), Column A, contributions from individuals/persons other than political committees, is \$472,977. If this figure includes any contributions from individuals which exceed \$200 or \$200 in the aggregate for the calendar year, you are advised that a Schedule A should be provided including the proper identification of each person pursuant to 11 CFR 100.12.

An amendment, if necessary, to your original report correcting the above problems should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely.

Mark Kleinman Reports Analyst Reports Analysis Division ATTACHMENT #15



### FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 3, 1980

Ms. Becki C. Burlingame, Treasurer National Conservative Political Action Committee 1500 Wilson Boulevard, Suite #513 Arlington, Virginia 22209

Dear Ms. Burlingame:

Enclosed for your information is a copy of the final audit report of the National Conservative Political Action Committee which was approved by the Commission on March 3, 1980.

In accordance with Commission policy, a copy of the report will be released to the public five days after your receipt of this letter. Should you have any questions regarding the public release of your audit report, please contact Mr. Fred Eiland of the Commission's Press Office at (202) 523-4065. Any questions you may yet have related to matters covered during the audit or in the audit report should be directed to Mr. Rick Halter of the Audit Division at (202) 523-4155.

Sincerely,

Robert &. Costa

Assistant Staff Director for the Audit Division

Enclosure as stated

CERTIFIED MAIL:
RETURN RECEIPT REQUESTED



## FEDERAL ELECTION COMMISSION

WASHINGTON DC 20463

REPORT OF THE AUDIT DIVISION
ON THE
NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE

#### Background

#### A. Overview

This report is based on an audit of the National Conservative Political Action Committee ("the Committee"), undertaken by the Audit Division of the Federal Election Commission in accordance with the Commission's audit policy to determine whether there has been compliance with the provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). The audit was conducted pursuant to Section 438(a)(8) of Title 2 of the United States Code which directs the Commission to make from time to time audits and field investigations with respect to reports and statements filed under the provisions of the Act.

The Committee registered with the Office of the Secretary of the Senate and the Office of the Clerk, U.S. House of Representatives on March 27, 1975. The Committee maintains its headquarters in Arlington, Virginia.

The audit covered the period from March 27, 1975 through August 31, 1977, the final coverage date of the most recent report filed by the Committee at the time of the audit. The Committee reported a beginning cash balance of \$-0-, total receipts for the period of \$4,021,112.34, total expenditures for the period of \$4,010,618.27 and a closing cash balance on August 31, 1977 of \$10,638.74. 1/

This audit report is based on documents and working papers which support each of the factual statements. They form part of the record upon which the Commission based its decisions on the matters in the report and were available to Commissioners and appropriate staff for review.

Ending cash-on-hand is misstated by \$144.67 due to an arithmetical error.

#### B. Key Personnel

The principal officers of the Committee during the period audited were Mr. Charles R. Black, Jr., Chairman and Mr. Roger J. Stone, Jr., Treasurer.

#### C. Scope

The audit included such tests as verification of total reported receipts and expenditures and individual transactions; review of required supporting documentation and analysis of Committee debts and obligations; and such other audit procedures as deemed necessary under the circumstances.

#### II. Findings and Recommendations

#### A. Reporting Individual Contributor Information

Section 434(b)(2) of Title 2, United States Code requires that the occupation and principal place of business, if any, of each person who has made one or more contributions within the calendar year in an aggregate amount or value in excess of \$100 be disclosed on reports filed with the Commission.

Section 102.9(e) of the Commission's Regularians states, in relevant part, that when Committee treasurers and candidates show that best efforts have been used to obtain and submit the information required, they shall be deemed to be in compliance.

Our review of contributor records and FEC disclosure reports revealed that the occupation and/exprincipal place of business was not reported as follows:

<b>Perio</b> d	Number of Itemized Contributions	Number of Itemized Contributions Without Required Information	% of Itemized Contributions Without Required Information
Period	Concilibations	Required Information	Intormacton
1/1/76-12/	- , - <u>-</u> .	134 809 415	79.3% 46.3% 57.6%
1/1/77-8/3	1/77 720	415	37.05
Total for Audited: 3 8/31/77		1358	51.52%

NCPAC made an attempt to obtain the required contributor information for the period 3/27/75-8/31/77. These efforts culminated with the filing of amendments. The first amendment, filed in July, 1977, contained the occupation and principal place of business for 72 contributions received from 1/1/77 thru 6/30/77. The second amendment, filed in May, 1978, contained the occupation and principal place of business of 731 contributions received from July 1, 1977 thru January 31, 1978.

#### Recommendation

In our opinion, NCPAC has made best efforts to obtain and submit the information required, and therefore, the Audit staff recommends no further action.

#### B. Reporting of Loans and Guarantors

Section 434(b)(5) of Title 2, United States Code requires the disclosure of each loan to or from any person within the calendar year in an aggregate amount or value in excess of \$100.00, together with the full names and addresses (occupations and the principal places of business, if any) of the lender, endorser, and guarantors, if any, and the date and amount of such loans.

Our review of NCPAC records revealed two (2) loans which were reported inaccurately with respect to guarantors. In the first case, five (5) guarantors of \$2,000.00 each (\$10,000) were identified by NCPAC. Our examination disclosed that eleven guarantors for \$910.00 each (\$10,010.00) should have been reported. It was noted that the principal amount of the loan was \$10,000, and the date of the loan was August 6, 1975. The second loan, reported as being received on June 9, 1977 the amount of \$20,000.00 was guaranteed by four (4) individuals. These four (4) individuals were not disclosed on reports filed by NCPAC.

These matters were brought to the attention of Committee personnel at the conclusion of the audit fieldwork. They agreed to file the necessary amendments to correct these irregularities.

On November 5, 1979, an amendment substantially correcting the public record was filed by the Committee.

#### Recommendation

The Audit staff recommends that no further action be taken since the appropriate amendments were filed with the Commission.

#### C. Reporting of Debts and Obligations

Section 104.8(a) and (b) of Title 11, Code of Federal Regulations states, in part, that debts and obligations which remain outstanding after the election shall be continuously reported until extinguished. A debt, obligation, or other promise to make an expenditure of \$500.00 or less, shall be reported as of the time payment is made, or no later than 60 days after occurrence, whichever comes first. A loan of money in the ordinary course of business and any debt or obligation over \$500.00 shall be reported as of the time of the transaction.

Our examination of NCPAC documents and disclosure reports, and a comparison thereof revealed that NCPAC had been improperly reporting debts and obligations during the period April 1, 1975 through March 31, 1977.

Our tests indicated that the liquidation of debts and obligations was not properly disclosed on Schedule C. However, it was noted that the reported debts and obligations were reported as having been paid as evidenced by entries in expenditure schedules on subsequent reports.

Since testing has given assurance that all reported debts and obligations were liquidated, no amending action is believed to be necessary on an item by item basis. However, we recommended that NCPAC submit a statement for the public record, signed by the Treasurer, indicating that all reported debts and obligations have been liquidated as of a given reporting date and that commencing with the May 10, 1977 report, debts and obligations will be reported as required by the Act. This statement was received on November 5, 1979.

#### Recommendation

The Audit staff recommends no further action on this matter.

# National Con-Political And

1500 wilson blvd. suite 5 12 f

August 22, 1980

. V. . .

Mr. Mark Kleinman Federal Election Commission 1325 K. Street, N.E. Washington, D.C. 20463

Dear Mr. Kleinman:

Attached you will find the National Conservative Political Action Committee's (NCPAC's) high dollar contributor listing for the months of March, 1980; April 1980, May 1980 and June 1980. Copies of the corresponding summary sheets are also enclosed for your convenience.

I apologize for the tardiness in filing these reports, but I had run into a number of complications that were beyond my control. For some reason that I cannot understand our computer service somehow had mixed our contributor information with one of their other clients. This has now been corrected and the attached reports are complete and correct to the best of my knowledge.

Please accept these printouts as amendments to our previously submitted reports, if you should have any questions, please don't hesitate to contact me.

Sincerely,

Susan S. Hannegan

SSH/nkm

# Natic Control

. P4: 21

Political Action Committee

1500 wilson blvd. suite 513 arlington, va. 2220. (700, 522-2000

September 19, 1980

Mark Kleinamn Pederal Election Commission 1325 K Street, M.W. Arlington, VA 22209

Dear Mr. Klienman:

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1 ) Attached you will find our computerized printout of our "highdollar" contributors for the period of July 1, 1980 through July 31, 1980. I have also enclosed a copy of our summary sheet for the corresponding monthly report.

Due to the volume of our contributions our computer service has difficulty in producing Abese reports at the time our monthly FEC reports are due. For this reason we have recently changed computer outfits and hopefully this problem will improve in the future.

Please accept this as an amendment to our July Monthly Report (7/1/80 - 7/31/80).

Treasurer

SSH:ech Enclosed



#### FEDERAL ELECTION COMMISSION

WASHINGTON TO 2046 -

# CERTIFIED MAIL RETURN RECEIPT REQUESTED

Susan S. Hannegan, Tresurer National Conservative Political Action Committee 1500 Wilson Boulevard, Suite 513 Arlington, VA 22209

RE: MUR 1294

Dear Ms. Hannegan:

On , 1980, the Federal Election Commission determined that there is reason to believe that your committee violated sections 434(b)(3)(A), 434(b)(1) and 434(b)(8) of the Federal Election Campaign Act of 1971, as amended (the "Act"). The General Counsel's factual and legal analysis, which formed the basis for the Commission's finding, is attached for your information.

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

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

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

Letter to Susan S. Hannegan Page 2 For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Beverly Brown, the staff member assigned to this matter, at 202/523-4529. Sincerely, Enclosures General Counsel's Factual and Legal Analysis Procedures

FEDERAL ELECTION COMMISSION GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS MUR NO. 1294 DATE STAFF MEMBERS & TEL. NO. RESPONDENT National Conservative Beverly Brown (202) 523-4529 Political Action Committee (NCPAC) Hal Ponder (202) 523-4166 SOURCE OF MUR: INTERNALLY GENERATED SUMMARY OF ALLEGATIONS During review of reports and statements filed by the National Conservative Political Action Committee (the "Committee"), analysts noted violations of certain provisions of the Federal Election Campaign Act of 1971, as amended (the "Act"). Specifically, analysts determined that the Committee may have violated: 2 U.S.C. § 434(b)(3)(A) by failing to timely disclose the identification of individuals . . whose contributions to the Committee aggregated in excess of \$200 within the calendar year, together with the date and amount of such contributions; 2 U.S.C. § 434(b)(8) by failing to disclose the 2) circumstances and conditions under which debts were reduced for less than their reported amounts; and 2 U.S.C. § 434(b)(1) by failing to properly disclose 3) cash on hand. On September 16, 1980, the Reports Analysis Division referred this matter to the Office of General Counsel noting that the alleged violations are of an ongoing nature. FACTUAL AND LEGAL ANALYSIS Disclosure of Individual Contributions ]. . 2 U.S.C. § 434(b)(3)(A) requires a political committee to disclose the identification of each person who makes a contribution to the reporting committee during the reporting period, whose contribution or contributions have an aggregate amount

or value in excess of \$200 within the calendar year, or in any lesser amount if the reporting committee should so elect, together with the date and amount of any such contribution. 1/

Reports filed by the Committee for the period covering August 1, 1979 through June 30, 1980, disclosed itemized receipts of \$58,122 from approximately 475 persons whose contributions for the calendar years exceeded an aggregate of \$100 or \$200. Amendments to reports for the above-referenced period, filed in August of 1980, subsequently revealed that the Committee was required to itemize approximately 2047 of previously unitemized contributions totalling \$523,965. In a cover letter to these amendments, the treasurer, Susan S. Hannegan, reported that the failure to itemize on original reports an estimated 81% of contributions required to be itemized resulted from the fact that the Committee's computer service mixed their contributor information with one of its other clients. The treasurer further stated that the error had been corrected. (See Exhibit "B").

Subsequent to the filing of amendments for the September 1979 through the July 1980 Monthly Report (covering August 1, 1979 through June 30, 1980), the Committee filed its August 1980 Monthly Report of receipts and expenditures (covering 7/1/80 through 7/31/80). Therein, analysts noted that the Committee disclosed unitemized receipts from individuals of an amount totalling \$472,977. No amount was listed nor were schedules attached for itemization of contributions aggregating in excess of \$200 within the calendar year. Therefore, on September 12, 1980, the Reports Analysis Division sent an informational notice to advise the Committee of disclosure requirements pursuant to 2 U.S.C. § 434(b)(3)(A). In addition, analysts referred this matter to our office for legal consideration.

The Office of General Counsel reviewed information made available through the Data and Reports Analysis Divisions to determine whether the Committee had subsequently filed an amendment to its August 1980 Monthly Report. Our review revealed that on September 19, 1980, the Committee filed an amendment to this report and, in addition, a September Monthly 1980 Report (covering 8/1/80 through 8/31/80). The amendment revealed contributions totalling \$50,530 which were required to be itemized. The September Monthly disclosed the receipt of contributions totalling \$542,259, none of which were itemized. However, in a footnote to this figure, the Committee indicated that an amendment to the

Prior to the 1979 amendment to the Federal Election Campaign Act, 2 U.S.C. § 434(b)(2) required political committees to disclose the full name and mailing address (occupation, principal place of business, if any) of each person who made one or more contributions to or for such committee or candidate in an aggregate amount or value in excess of \$100, together with the amount and date of such contributions.

3 -September Monthly Report disclosing itemized contributions would be forthcoming. Furthermore, in a cover letter to these reports, the treasurer of the Committee offered this additional comment: "Due to the volume of our contributions our computer service has difficulty in preparing these reports at the time our monthly FEC reports are due. For this reason we have recently changed computer outfits and hopefully this problem will improve in the future." Failure to disclose the identification of persons whose contributions to the Committee exceed an aggregate of \$200 within the calendar year violates 2 U.S.C. § 434(b)(3)(A). In view of the magnitude of the violation noted with respect to this provision; the fact that the Committee was two to eight months delinquent in amending its reports and revealing the circumstances under which timely disclosure could not be accomplished; and, the fact that reporting problems with respect to disclosure of itemizable contributions appear to be of an ongoing nature, the Office of General Counsel recommends that the Commission find reason to believe the Committee violated 2 U.S.C. § 434(b)(3)(A). 2. Disclosure of Outstanding Debts and Obligations 2 U.S.C. § 434(b)(8) requires continuous disclosure of the amount and nature of outstanding debts owed by or to such political committee; and where such debts and obligations are settled for less than their reported amount or value, a statement as to the circumstances and conditions under which such debts or obligations were extinguished and the consideration therefor. During review of the Committee's debt and obligation schedules for its April Monthly Report of receipts and expenditures, analysts determined that the balance of debts owed to Richard A. Viquerie Co. decreased by \$68,670. However, related expenditures for a portion or \$10,272, of this debt reduction were not itemized as required, nor did the Committee provide a statement as to the circumstances and conditions under which this portion of the debt was extinguished. In addition, analysts noted that the Committee failed to disclose the conditions under which a portion, or \$2,337, of the balance of debts owed to American Mailing Lists were extinguished. On June 3, 1980, the Reports Analysis Division sent a letter to notify the Committee of the above findings made during the review of its April Monthly 1980 Report. Therein, analysts recommended that the Committee amend its report within fifteen days to correct the reporting problems noted in the course of review. After a period of twenty-nine days had expired, the Reports Analysis Division issued a second notice to inform the Committee that if no response was received within fifteen days, the Commission might choose to initiate audit or legal enforcement action.

On September 16, 1980, the Reports Analysis Division referred this matter to our office, noting as reason for referral the Committee's failure to respond to requests for additional information and the presence of ongoing problems in this area of disclosure. Specifically, review of reports filed subsequent to the April Monthly Report revealed that for the months of May and June related expenditures or circumstances under which the following debts were extinguished had not been disclosed: Portion of debt extinguished for which there is no explanation on file Vendor Prep Inc. \$13,481 Metro Printing 2,055 Diversified Direct Inc. 1,051 Berlin & Jones Inc. 1,563 Response Graphics 1,001 Total \$19,151 In view of the Committee's failure to provide the circumstances and conditions under which debts were extinguished at \$31,760 less than their reported amount during the periods covered by its April, June and July monthly reports, the Office of General Counsel recommends that the Commission find reason to believe that the National Conservative Political Action Commttee violated 2 U.S.C. § 434(b)(8). Disclosure of Cash On Hand 2 U.S.C. § 434(b)(1) requires a political committee to disclose the amount of cash on hand at the beginning of the reporting period including: currency; balance on deposit in banks, savings and loan institutions, and other depository institutions; travelers checks owned by the committee; certificates of deposit, treasury bills and any other committee investments valued at cost. During review of reports filed by the Committee, analysts noted a discrepancy of \$16,543 between the ending cash balance for the August Monthly 1979 Report (\$57,255) and the beginning cash balance reported for the September Monthly 1979 Report (\$40,712). On June 3, 1980, analysts notified the Committee of the \$16,543 cash on hand discrepancy and recommended that the Committee amend its original reports to clarify this matter for the public record. On June 25, 1980, the Committee requested an extension of time in which to review its records and reply to the Commission's notification. When no response was received within a seven day period of extension, the Reports Analysis Division sent a second notice to the Committee.

**-** 5 -On August 6, 1980, the Committee filed an amendment to its August Monthly 1979 Report. In a cover letter to this report, the Committee revealed that the discrepancy was due to mathematical errors, voided checks, bank charges and changes in the original amount of receipts disclosed. In addition to the August Monthly 1979 Report, the Committee submitted amended summary pages for all reports filed through the December Monthly 1979 Report. For these pages, cash on hand totals were adjusted due to the corrections made to the original August Monthly 1979 Report. Based on information provided in the referral of this matter to the Office of General Counsel, it appears that the Committee has failed to reconcile cash on hand discrepancies. The amendments filed with respect to 1979 election activity disclose an ending cash balance of \$47,919 for the period ending November 30, 1979. The beginning cash balance for the period commencing December 1, 1979 is disclosed as \$37,544. Thus, a new cash on hand discrepancy of \$10,375 exists. Although the Reports Analysis Division has not given prior notice of the new cash on hand discrepancy noted during review of the Committee's December Monthly 1979 Report and the Year End 1979 Report, for purposes of consistency in handling, the Office of General Counsel recommends the Commission find reason to believe the Committee violated 2 U.S.C. § 434(b)(1). RECOMMENDATIONS Find reason to believe that the National Conservative Political Action Committee violated 2 U.S.C. § 434(b)(3)(A). Find reason to believe that the National Conservative Political Action Committee violated 2 U.S.C. § 434(b)(8). Find reason to believe the National Conservative Political Action Committee violated 2 U.S.C. § 434(b)(1).

#### **REPORTS ANALYSIS REFERRAL UPDATE**

\*ORIGIN: RAD

THROUGH:	of General Counsel  ATTENTION: Beverly Brown  STAFF DIRECTOR  ASSISTANT STAFF DIRECTOR	ANALYST  TEAM CHIEF Bobby Werfel  COMPLIANCE REVIEW  FOR REPORTS ANALYSIS  Mark Kleinman Michael Micha				
MUR No.	1294	DATE OF ORIGINAL REFERRAL .	9-15-80			
••PURPOSE:	INFORMATION:					
		CASH PROBLEMS, SINCE FILING PERIOD 1-1-79 THROUGH 1-31-81.	ATTACHMENT #1			

OUTCOME: (if applicable)

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

#### ANALYSIS OF NCPAC'S CASH REPORTING PROBLEMS:

- Relying solely upon the most recent amendments filed for the reporting period 1-1-79 through 1-31-81, there is a cash-on-hand discrepancy of \$81 or less than \$4 per report (25 reports). (Note: See Chart)
- Comparing the changes between the original reports and the amendments filed for the reporting period 1-1-79 through 1-31-81, there is a discrepancy of \$199 or less than \$8 per report.
- 3. Total activity for the committee for the period 1-1-79 through 1-31-81 is \$15,778,007.
- 4. Reported changes include; +\$2,632 beginning cash-on-hand; +\$47,407 in receipts; and +\$122,430 in disbursements.
- 5. Of the \$122,430 in additional disbursements, \$75,001 or 61% was for independent expenditures not previously disclosed, coming from the regional offices established by NCPAC in: California, Idaho, Indiana, Iowa, Missouri, and South Dakota.
- 6. The remainder of the changes comes largely from clerical or mathematical errors i.e., reporting a \$200 check as \$2,000, etc.

3 1 3 1 3 3 3 3 3 3 3 3

# NCPAC SUMMARY OF RECEIPT AND DISBURSEMENT ACTIVITY 1-1-79 TO 1-31-81

	BEGINNING CASH-ON-HA 1-1-79	AND	RECEIPTS		DISBURSEMENTS	ACTUAL <sup>1</sup> TOTAL		REPORTED CASH-ON-HAND 1-31-81		DIFFERENCE	
OLD <sup>2</sup>	10,490	+	7,949,499	-	7,658,671	= 301,318	-	301,038	=	280	
NEW <sup>3</sup>	13,122	+	7,996,906	-	7,781,101	= 228,927	-	228,846	=	81	
CHANGES <sup>4</sup>	2,632	+	47,407	-	122,430	= 72,391	_	72,192	=	199	

- 1- MATHEMATICAL TOTAL.
- 2- ALL ORIGINAL REPORTS FILED 1-1-79 THROUGH 1-31-81.
- 3- MOST RECENT AMENDMENTS TO ORIGINAL REPORTS FILED 1-1-79 THROUGH 1-31-81.
- 4- REPRESENTS DIFFERENCES BETWEEN ORIGINAL REPORTS AND AMENDMENTS FILED FOR THE PERIOD 1-1-79 THROUGH 1-31-81.

#### REPORTS ANALYSIS REFERRAL UPDATE

\*ORIGIN: RAD

DATE	IEMBER 3,1980	ANALYST	rk Kleinman MK
TO: Office THROUGH: FROM:	ce of General Counsel  ATTENTION: Beverly Brown  STAFF DIRECTOR  ASSISTANT STAFF DIRECTOR  PER OGC REQUEST	COMPLIANCE REVI	EW Peggy Sims Live
MUR No.	1294	DATE OF ORIGINAL REFERE	9-15-80
••PURPOSE:	October Monthly Report (9 Pre-General Election Repo showing approximately \$1,	ITICAL ACTION COMMITTEE (NCPA -1-80 to 9-30-80) and 12 Day rt (10-1-80 to 10-15-30) 000,000 in Memo Entries on Expenditures which are also	AC) ATTACHMENT #1
	7-31-80) RFAI regarding p	t Monthly Amendment (7-1-80 tossible corporate contribution the report upon which the RFA self)	ons.

OUTCOME: (if applicable)

<sup>\*</sup>Commission unit which initiated original Referral (e.g. AUDIT/RAD/OGC).

<sup>\*\*</sup>INFORMATION, or RESULTS OF RAD ACTION, as appropriate.

ATTACHMENT #1

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OCTOBER MONTHLY REPORT (9-1-80 to 9-30-80)

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#### ITEMIZED INDEPENDENT EXPENDITURES

Page 42 at 50 Page

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Name of Commisses (in Full)	· · · · · · · · · · · · · · · · · · ·	Diff. Id.	D. No.	
National Conservative Politic			C000246	•
Full hame, Making Address & ZIF Code of Each Payor	Purpose of Expensions	Does imanth, day, year)	Amount	Name of Fodoral Condidutal supported or appeared by the expanditure & office saught
American Mail List Co. (MEMO ITEM from Schedule D)	Mail List rental	Accounts Payable	16,777.04	Reagan President
Berlin & Jones Co, Inc.  (MEMO Item from Schedule_D)	Printing .	A/P	21,774.99	Reagan President
Berlin & Jones Co., Inc. (Memo Item from Schedule D)	Printing	A/P	3,395.33	Carter President
Berlin & Jones Co., Inc. (MEMO Item from Schedule D)	Printing	A/P	429.56	Church U.S: Senate Idaho
Berlin & Jones Co., Inc. (MEMO Item from Schedule D)	Printing	A/P	429.56	Culver U.S. Senate Iowa
Berlin & Jones Co., Inc. (MENO Item from Schedule D)	Printing	A/P	429.56	Cranston U.S. Senate California
(a) SUBTOTAL of Itemized Independent Expendition (b) SUBTOTAL of Unitemized Independent Expenditures (c) TOTAL Independent Expenditures	d-twee		INCLUDED	5

Under penalty of perjury 8 certify that the independent expenditures reported hearin were not made in cooperation, consultation, concert with, or at the sequent or suggestion of any candidate or any particular's committee or agent ell such candidate or authorized committee. Furthermore, these expenditures ell under shorted that expenditures ell under shorted the humaning of dissemination, distribution, or republication is whole or in part of any campaign materials precured by the candidate, his campaign committee, or their agent.

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## ITEMIZED INDEPENDENT EXPENDITURES

the Revers Side for Instrument

otional Companyation Deliated	Andre Comisses	ł	C00034687	
Ational Conservative Political Full Name, Mailing Adorsis & ZIF Code of Each Payer	Action Committee  Aurous of Expenditure	Dese smonth, day, year)	C00024687	Name of Foor a Conscale supported or appoint by the expenditure & effice sought
Berlin & Jones Co., Inc. (MEMO Item from Schedule D)	Printing	Accounts Payable (A/P)	429.55	Bayh U.S. Senate Indiana
Berlin & Jones Co., Inc. (MEMO Item from Schedule D)	Printing .	(A/P)	429.55	McGovern U.S. Senate South Dakota
D.C. Lithographers (MEMO Item from Schedule D)	Printing	(A/P)	2,561.70	Carter President
D.C. Lithographers (MEMO Item from Schedule D)	Printing	(A/P)	6,948.50	Reagan President
Diversified Direct (MEMO Item from Schedule D)	Printing	(A/P)	9,606.29	Reagan President
Diversified Direct (MEND Item from Schedule D)	Printing	(A/P)	2,663.15	Carter President
al SUBTOTAL of Itemized Independent Expenditu bi SUBTOTAL of Unitemized Independent Expend of TOTAL Independent Expenditures.		ed ites -	TCTALS NOT	

Under penalty of perjury is certify that the independent expenditures reported herein were not made in cooperation, consultation, concert with, or at the request or supjection of any candidate or any authorized committee or agent of such candidate or authorized committee. Further more these expenditures did not involve the financing of dissemination, distribution, or republication in whose or in port of any campaign materials prepared by the candidate, his campaign committee, or their agent.

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#### ITEMIZED INDEPENDENT EXPENDITURES

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	Full home, Maring Address & ZIF Code of Each Payde	Person of Expensions	Cay, year)	Amqunt	Name of Federal Candidate supported or opposed by the expenditure & office sough
	Diversified Direct (MEMO Item from Schedule D)	Printing	A/P	262.91	McGovern U.S. Senate South Dakota
	Diversified Direct (MEMO Item from Schedule D)	Printing	A/P	262.91	Bayh U.S. Senate Indiana
_		•			□ Support XI Oppos
	Diversified Direct (MEMO Item from Schedule D)	Printing	A/P	262.91	Church U.S. Senate
	Diversified Direct (MENO Item from Schedule D)	Printing	A/P	262.91	Cranston U.S. Senate California
	Tyersified Direct (rept) 11	Printing	A/P	262.92	Culver U.S. Senate Iowa
	Diversified Mail Services (MEMO Item from Schedule D	Mailing & Compute Services	A/P	15,072.25	Carter President

Under penalty of perjury is certify that the independent expenditures reported nerein were not made in cooperation, continuation, concert with, or at the request or suggestion of any candidate or any authorized committee or agent of such candidate or authorized committee. Furthermore, these expenditures and not involve the financing of distamination, distribution, or republication in whore or in partic? any campaign materials prepared by the candidate, his campaign committee, or their agent.

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#### ITEMIZED INDEPENDENT EXPENDITURES

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Name of Committee On Full)		1	D. No	
National Conservative Politi	cal Action Committee		C00024687	
Fust having, Maining Approva. & ZIF Code of Each Poyce	Arson of Exponditure	Dese imonin, day, year)	Amoun:	Name of Foderal Conditions suggested or apposed by the expenditure & office sought
Diversified Mailing Services (MEMO Item from Schedule D)	Mailing & Computer Services	A/P	54,847.59	Reagan President
Diversified Mailing Services (MEMO Item from Schedule D)	Mailing & Computer Service	A/P	752.19	Church . U.S. Senate Idaho
Diversified Mailing Services (MEMO Item from Schedule D)	Mailing & Computer Services	A/P	752.19	Cranston U.S. Senate California
Diversified Mailing Services (MEMO Item from Schedule D)	Mailing & Computer Services	A/P	752.19	Culver U.S. Senate
Diversified Mailing Services (MEMO Item from Schedule D)	Mailing & Computer Services	A/P	752.20	McGovern U.S. Senate South Dakota
Diversified Mailing Services (MEMO Item from Schedule D)	Mailing & Computer Services	A/P	752.20	Bayh U.S. Senate Indiana
(a) SUBTOTAL of Item-zed independent Expendity (b) SUBTOTAL of Unitem-zed Independent Expend (c) TOTAL Independent Expenditures		NOT TRUE	DEL IN TOTAL	s

Under penalty of perjuny 8 certify that the independent expendituret reported herein were not made in cooperation, consultation, concert with, or at the request or suggestion of any candidate or any authorized committee or agent of such conducte or authorized committee. Furthermore, these expenditures did not involve the fingening of dissemination, distribution, or republication in whole or in part of any cambeign materials prepared by the candidate, his cambeign committee, or their agent.

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## ITEMIZED INDEPENDENT EXPENDITURES

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Nume of Commisses &n Pull)			1.0 No.	
National Conservative Political	l Action Committee	}	C000246	87
Full hame, Mailing Address & ZIF Code of Each Povee	Arress of Experience	Class imports day, year)	Amount	Name of Federal Canadate suggested or opposed by the exponditure & effice sought
Metro Printing & MAiling Serv. (MEMO Item from Schedule D)	Printing	A/P	9,896.	Reagan President  XX Support     0000000
Mount Vernon Publishing Co. (MEMO Item from Schedule D)	Printing	A/P	2,459.	Reagan . President
Mount Vernon Publishing Co. (MENO Item from Schedule D)	Printing	A/P	282.	McGovern U.S. Senate South Dakota
Prep, Inc. (MEMO Item from Schedule D)	Printing	A/P	261	Eagleton
Prep, Inc. (MEMO Item from Schedule D)	Printing	A/P	286	McGovern .91 U.S. Senate South Dakota
Prep, Inc. (MEMO Item from Schedule D)	Printing	A/P	548	Bayh U.S. Senate Indiana
(a) SUBTOTAL of Itemized Independent Expendit (b) SUBTOTAL of Unitemized Independent Expendent Expendent Expendent Expenditures		OT INCLUD	ED IN TOTA	
Under penalty of perjuny 1 certify that the indecende herein were not made in dopperation, consultation or request or suggestion of any candidate or any author of such candidate or authorized committee. Further did not involve that financing of dissemination, distribly whose or in part of any campaign materials preparationally in more or in part of any campaign materials preparationally in the properties of their agent.	Ore me this can all			

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## ITEMIZED INDEPENDENT EXPENDITURES

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Full Name, Making Accress & ZIF Coos of Each Payon	Purpose of Expensions	Dest impain, day, year)	Amount	Name of Foot's Cardida supported or operated by a expenditure & office soug
Prep, Inc. (MEMO Items from Schedule D)	Printing	A/P	548.60	Church U.S. Senate Idaho
Prep, Inc. (MENO Item from Schedule D)	Printing	A/P	548.60	Culver U.S. Seante Iowa
Prep, Inc. (MENO Item from Schedule D)	Printing	A/P	548.60	Cranston U.S. Senate California
Prep, Inc. (MEMO Item from Schedule D)	Printing	A/P	7,528.84	Reagan President
The Viguerie Co. (MEMO Item from Schedule D)	Mail list rental, Mail fees and Computer Services	A/P	94,123.96	Reagan President
The Viguerie Company (MEMO Item from Schedule D)	Mail list rental, Mail fees and Computer Services	A/P	31,863.46	Carter President
(a) SUBTOTAL of Itemized independent Expendi (b) SUBTOTAL of Unitemized Independent Expe (c) TOTAL Independent Expenditures	•	T INCLUDED	IN TOTALS	

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Fui: hame, Mailing Approx & ZIP Code of Each Payer	Purpose of Expensiture	Dase uniquien, day, year)	Amount	Name of Februar Canonial supported or appeared by the expenditure & office lough
The Viguerie Company (MEMO Items from Schedule D)	Mail list Rental Mail Fee and Computer Services	A/P	1,096.04	Eagleton U.S. Seante Missouri DODOO
The Viguerie Company (MEMO Item from Schedule D)	Mail list Rental, Mail Fees and Computer Services	A/P	1,925.52	McGovern U.S. Senate South Dakota
The Viguerie Company (MEMO Item from Schedule D)	Mail list Rental, Mail fees and Computer Services	A/P	3,021.55	Church U.S. Seante Idaho
The Viguerie Company (MENO Item from Schedule D)	Mail list rental Mail fees and Computer Service	A/P	3,021.55	Culver U.S. Senate Iowa
The Viguerie Company (MEMO Item from Schedule D)	Mail list Rental Mail fees and computer Services	A/P	3,021.55	Cranston U.S. Seante California
The Viguerie Company  (MEMO Item from Schedule D)	Mail list Rental Mail fees and Computer Services	A/P	3,021.55	Bayh U.S.Senate Indiana

Under cenaity of perjuny I certify that the independent expenditures reported herein were not made in cooperation, consultation, concert with lor at the request or suggestion of any candidate or any authorized committee or agent of such candidate or authorized committee. Furthermore, these expenditures and not involve the finneding or dissemination id stribution or republication in whore or in portiof any campaign materials prepared by the candidate, his campaign committee or their agent.

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## ITEMIZED - DEPENDENT EXPENDITURES

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Name of Committee to Sunt				
Nome of Commisses (in Pull)		1	I D. No.	
National Conservative Politica	Action Committee		C00024687	
Full harris, Maring Ascress & ZIF Code of Each Payee	Purpose of Expand turn	dey, year)	Amount	Name of Face of Candidata supported or appointed by the expenditure & office saught
Tri-State Envelope Co. (MEMO Item from Schedule D)	Supply and/or printing envelopes	A/P	1,174.72	Reagan President
				XC Support C Cooper
Tri-State Envelope Co. (MEMO Item from Schedule D)	Supply and / or printing envelopes	A/P	282.55	McGovern U.S. Senate South Dakota
Tri-State Envelope Co. (MEMO Item from Schedule D.)	Supply and / or Printing Envelopes	A/P	282.55	Bayh U.S. Senate- IN
Tri-State Envelope Co. (MEMO Item from Schedule D)	Supply and/or Printing Envelopes	A/P	282.55	Church U.S. Senate Idaho
Tri-State Envelope Co. (MEMO Item from Schedule D)	Supply and/or Printing Envelopes	A/P	282.55	Culver U.S. Senate Iowa
Tri-State Envelope Co. (MEMO Item from Schedule D)	Supply and / or Printing Envelopes		282.55	Cranston U.S. Senate California
tel SUSTOTAL of Itemized Independent Expenditu (b) SUSTOTAL of Unitemized Independent Expend (c) TOTAL Independent Expenditures		INCLUDE	D IN TOTAL	s

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INDEPENDENT EXPENDITURES

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of Each Poyce	Expenditure	<del>dpy</del> , <del>year</del> )		supported or associately the expenditure & office sought
MediAmerica, Inc. (MEMO Item from Schedule D)	Media Buys, Production, Typing Printing & Mailing Services	A/P	149,395.50	Reagan President
MediAmerica, Inc, (MEMO Item from Schedule D)	Media Buys, Production, Typing, Printing & Mailing Services	A/P	1,357.92	Eagleton . U.S. Senate Missouri
MediAmerica, Inc. (Item from Schedule D)	Media Buys, Production, Typing, Printing & Mailing Services	A/P	1,293.15	Culver U.S. Senate Iowa D \$4000000 XX Occoses
MediAmerica, Inc. (MEMO Item from Schedule D)	Typing, Printing and Mailing Service	A/P	1,054.28	Indiana
				Support Dogge
MediAmerica, Inc. (MEMO Item from Schedule D)	Typing, Printing and mailing Service	A/P	1,054.28	Cranston U.S.Senate California
MediAmerica, Inc. (MEMO Item from Schedule D)	Typing, Printing and mailing services	A/P	1,054.20	Church U.S. Senate Idaho

Under density of deriuny is certify that the independent expenditures reported herein were not made in cooperation consultation conject with, or at the reducts or suggest on of any candidate or any authorized committee or agent of such candidate or unique the remove these expenditures for any authorized committee or agent of old not incopies the financing of distemination of stribution or reduction in whose or in part of any cambalgo materials prepared by the candidate, his cambalan committee of their agent.

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12 DAY PRE-GENERAL ELECTION REPORT (10-1-80 to 10-15-80)

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1.0 54. Norma of Committee (in Full) National Conservative F. . . . . . . . . . . . Committee C00024637 For Kenne, Marine & Associate & Elle Const Die wo No 14 0 Put 1 Conson of Ends Payer der, year! --seconditure & ethics sought Accounts Reagan American Mailing List Mail list Renta 15,610.87 President Payable XX Support C Cocces Berlin & Jones Co., Itc. . Reagan Printing A/P 20,262.39 President XX Support C Opens Berlin & Jones Co., Ien. Carter Printing A/P 3,395.33 President Support X Decome Church Berlin & Jones Co., Inc. Printing A/P 287.28 U.S. Senate Idaho □ Success VQ Copess Berlin & Jones Co., Inc. Printing A/P 287.28 Culver U.S. Senate Iowa O0000 □ Succept Berlin & Jones Co., Inc. Printing A/P 287.28 Cranston U.S. Senate CA D Support XX Ouppose MEMO ITEMS to SUSTOTAL of Uniterrized Independent Expenditures . . . TOTALS NOT INCLUDED ON (c) TOTAL Inorpendent Expenditures. SUMMANY-

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Under sensing of perjuny if certify that the independent expenditures reported figrein were not made in cocorration, consultation, concert with, or at the request or supplied on a savi candidate or any authorized committee or agent all sum candidate or authorized committee. Furthermore, these expenditures and not involve the financing of distinction distribution, or republication whose or in part of any cambalgh materials prepared by the candidate, his cambalgh committee or their agent.

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National Conservative Pol	itics 'tion Com		C0002468	7
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Berlin & Jones Co., Inc.	Printing	A/P	287.29	Bayh U.S. Senate IN
Berlin & Jones Co., Inc.	Printing .	A/P	287.29	McGovern. U.S. Seante S.D.
D.C. Lithographers	Printing	A/P	1,561.70	Carter President
D.C. Lithographers	Printing	A/P	6,948.50	
Diversified Mail Marketin	ng Mailing & Compu Services	rter A/P	14,172.29	Carter President
Diversified Mail Marketi	ng Mail & Compute Services	A/P	49,725.7	Reagan President
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Diversified mail Marketin	g Mail & Computer Services	A/P	752.20	Bayh U.S. Senate IN
Diversified Mail Marketin	g Mail & Computer Services	A/P	752.20	McGovern U.S. Senate S.D.
Diversified Direct, Inc.	Printing	A/P	11,284.77	Reagan President
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1.6.6. Nome of Committee Lin Full) National Conservative Fa 1 Action Com C00024687 No house, being how mad 20 to a Mari 1000 W 1800 11 Co 18000 Lunano of Each Peyes (D) , YEST) buttoerrad or appropriat by the expensions & other sought Diversified Direct, Inc. Printing A/P 2,663.15 Carter Presidient Chart Xg Ores Eagleton Diversified Direct, Inc. Printing A/P 262.92 U.S. Senate MO C Support X & Opense Diversified Direct, Inc. Printing A/P 262.91 Church U.S. Senate Idaho X & Ossess Diversified Direct, Inc. Printing A/P 262.91 Culver U.S. Senate I owa D'ossess Cranston C Diversified Direct, Inc. Printing A/P 262.91 U.S. Senate CA Support XX Oppose Bayh Diversified Direct, Inc. Printing A/P 262.91 U.S. Senate IN Svocort Down (a) SUBTOTAL of Itemized Independent Expenditures . . . . . MEMO ITEMS NOT REFLECTED ON SUDCIARY IC! TOTAL Independent Expenditures. Under penalty of perjury I certify that the independent expenditures reported Subscribed and sworn to before me this .....

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Prep, Inc.	Printing	A/P	7,141.2	Reagan President	
Prep, Inc.	Printing	A/P	261.7	Eagleton U.S. Senate MO	
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Tri-state Envelope Corp.	Supply and/or Printing Envelo	A/P Pes	282.55	Bayh U.S. Senate Indiana Charrer Xi
Tri-state Envelope, Corp.	Supply and/or Printing Envelope	A/P	282.55	McGovern U.S. Senate S.D.
Tri-state Envelope, Corp.	Supply and/or Printing Envelope	A/P	456.02	Reagan President
The Viguerie Co., Inc.	Mail fee, Mail List Rental & Computer Service	A/P	123,192.1	Reagan President
The Viguerie Co., Inc.	Mail fee, mail list Rental & Computer Service	A/P	31,863.4	Carter President
The Viguerie Co., Inc.	Mail fee, Mail list rental & Computer Service	A/P	3,023.55	Church U.S. Senate Idaho Dhome Bhom

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The Viguerie Co., Inc.	Mail fees, Mail List Rental and Computer Service	A/P	1,925.52	McGovern U.S. Senate South Dakota
The Viguerie Co., Inc.	Mail Fees, Mail List Rental and Computer Service	A/P	1,088.04	Eagleton U.S. Senate MO
MediAmerica, Inc	Mialing Services Printing, Media Buys & Production	A/P	167,638.	Reagan 3 President X⊠‱ □ ○
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lediAmerica, Inc.	Modia Boys, Advertising	A/P	1,357.65	Eagleton U.S. Senate MO Change Economic
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ATTACHMENT #2

AUGUST MONTHLY AMENDMENT (7-1-80 to 7-31-80)
SHOWING ITEMIZED CONTRIBUTORS (\$50,530)
INCLUDING \$3,100 IN CORPORATE CONTRIBUTIONS.

Notice Later

15 P4: 21

# Political Action Committee

1500 wilson blvd. Bulke End Entity ich, Ver Lee

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September 19, 1980

Mark Kleinamn Federal Election Commission 1325 K Street, N.W. Arlington, VA 22209

Dear Mr. Klienman:

Attached you will find our computerized printout of our "highdollar" contributors for the period of July 1, 1980 through July 31, 1980. I have also enclosed a copy of our summary sheet for the corresponding monthly report.

Due to the volume of our contributions our computer service has difficulty in producing %bese reports at the time our monthly FEC reports are due. For this reason we have recently changed computer outfits and hopefully this problem will improve in the future.

Please accept this as an amendment to our July Monthly Report (7/1/80 - 7/31/80).

Sincerely

Susan S. Hannegan

Treasurer

SSH:ech Enclosed REPORT OF RECEIPTS AND DISBURSEMENTS
For a Political Committee Other Than an Authorized Committee

80 SEP 18 P4: 21

## (Summary Page)

Name of Committee (in Full)	4. TYPE OF	REPORT (check as	POPIALE	boxes!		
National Conservative Political Action Committee	ω 🗖	April 15 Quarterly R	leport			
701101011		July 15 Quarterly Re	port	-		
Address (Number and Street)	i o	October 15 Quarteri	y Report			
1500 Wilson Blvd.		January 31 Year End Report				
Suite #513				· -election Year Only)		
City Crass and 71B Code	1 -		-	•		
City, State and ZIP Code Arlington, VA 22209		Monthly Report for				
Allington, the later		Twelfth day report pelection on		(Type of Election)		
= Check if address is different than previously reported.	i			the General Election		
2. FEC Identification Number C00024687	,			te of		
3. D. This committee qualified as a multicandidate com-		Termination Report				
mitter during this Reporting Period on	(b) is 1	this Beport on Amen	dment?			
(date)		XYES	X NO			
SUMMARY	00	Column A This Period	i	Column B Calendar Year-to-Date		
6. Covering Period 7-1-80 Through 7-31-	-80	40 P. A. N. S. C.	, ,	TESTO-USI		
6. (a) Cash on Hand January 1, 19.80.	• • • • • • • • • • • • • • • • • • • •		s	45,259.17		
(b) Cash on Hand at Beginning of Reporting Period	• • • • • • • • • •	s <sub>111.780.2</sub>	,	* * * * * * * * * * * * * * * * * * *		
(c) Total Receipts (from Line 18)	• • • • • • • • • • •	\$475,447.5	1  8	2,491,171.78		
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)	• • • • • • • • • • • • • • • • • • • •	s587,227.8	s	2,536,430.95		
7. Total Disbursements (from Line 28)	• • • • • • • • • • •	\$358,627.4°	7   8	2,307,830.61		
8. Cash on Hand at Close of Reporting Period (subtract line				228,600.34		
9. Dabts and Obligations Owed TO the Committee		1	103			
(Izemize all on Schedule C or Schedule D)	• • • • • • • • • • • • • • • • • • • •	s 9556.2	20			
IO. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)		s 456,059.				
Ferrity that I have examined this Report and to the best of my know	aladas asol bakat					
It is true, correct and complete.				mation, contact:		
Susan S. Hannegan		To	oli Free BOJ	c firministon 424 9530		
Type or Print Rame of Tressurer		/	203-63 203-63	J-905		
Susan & Hanneder	Elezi	80		•		
SIGNATURE OF THEASURER	Dolo					
	6 Min L. C. W. 134	person signing this Rep	ort to the p	emailties of 2 U.S. \$43		
SIOTE: Submission of false, erroneous, or Incomplete Information						
BIOTE: Submission of false, erroneous, or Incomplete Information  AM previous versions of PEC PORAL 3 and P			org // }~ us			

## DETAILED SUMMARY PAGE of Receipts and Disbursements (Page 2, FEC FORM 3X)

National Conservative Political Action Committee	Report Covering the Penad From: 7/1/80	7/31/80
•	COLUMN A Total This Period	COLUMN B
L RECEIPTS	MARKE NAMED IN	
11.CONTRIBUTIONS (other than loans) FROM.	472,977.93	2,476,094.79
(a) Individuals/Persons Other Than Political Committees	4/2,9//.93	2,470,034.73
Memo Entry Uniternized 8 422.447.93		•
b) Political Party Committees	••••	• • • • • • • • • • • • • • • • • • • •
(c) Other Political Committees		
MITOTAL CONTRIBUTIONS (other than losses) ledd 11a, 11a and 11c)	472,977.93	2,476,094.79
12 TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES		
13.ALL LOANS RECEIVED		
M.LOAN REPAYMENTS RECEIVED		3,400.00
15.0 FFSETS TO OPERATING EXPENDITURES (Refunds, Rebetes, etc.)	2,469.61.	11,676.99
16 REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES		
17.OTHER RECEIPTS (Dividends, Inserest, etc.)		
18. TOTAL RECEIPTS (Add 11d, 12, 13, 14, 15, 16 and 17)	475,447.54	2,491,171.78
II. DISBURSEMENTS		Act and the second
19.0PERATING EXPENDITURES	212,673.36	1,397,303.41
20.TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES		
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	5,976.77	91,696.71
22. IN DEPENDENT EXPENDITURES (Use Schedule E)	139,977.34	817,159.49
22.COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. §441a(d)) (Use Schedule F)		
M.LGAN REPAYMENTS MADE		!
75 LOANS MADE		<u> </u>
25 REFUNDS OF CONTRIBUTIONS TO:	Last to Child and said Comments and	260000000000000000000000000000000000000
(a) Individuals/Persons Other Than Political Committees		1,671.00
(b) Political Party Committees.		1
(c) Other Political Committees		
(a) TOTAL CONTRIBUTION REFUNDS (add 28a, 26a and 28c)		1,671.00
27. OTHER DISBURSEMENTS.		
28. TOTAL DISSUASEMENTS (Add Llors 19, 20, 21, 22, 23, 24, 25, 26d and 27)	358,627.47	2,307,830.61
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES	Mintelling Street	
29. TOTAL CONTRIBUTIONS (other than loans) from Line 116	472,977.93	2,476,094.79
30.TCTAL CONTRIBUTION REFUNDS from Line 28d.	-0-	1,671.00
31.F:27 CONTRIBUTIONS fother than loans! (subtract Line 30 from Line 29)	472 077 02	2,477,765.79
	212.673 36	1,397,303.41
32.TOTAL OPIRATING EXPENDITURES from Line 19	2,469.61	11,676.99
23 OFFS. TS TO OPERATING EXPENDITURES from Line 15	A14 444 ==	

MAET OPERATING EXPENDITIONS

#### PERIOD 07/01/80 - 07/31/80

ITEMIZED RECEIPTS-CONTRIBUTIONS, SALES AND COLLECTIONS, LOANS, AND TRANSFERS

NCPAC	· ME	PART NO.	1. LINE NO.	144.
DATE		OCCUPATION AND BUSINESS ADDRESS	AGGR. RECE VTO. THIS	
7/21/80	42 GRANITE STREET	TREASURER CLIFFEX BELLOWS CORP. 45 WEST 3RD STREET BOSTON. MA 02127	250.00	250.0
	SHARDN, MA 02067	INFORMATION REQUESTED. BUT NOT RECEIVED FROM CONTRIBUTOR	1000.00	1000.0
7/28/80 ©		SALESMAN ELMCREST GROWERS MARBLE DALE: CT 06068	250.00	250.0
K14/80	ADMIRAL RUSSEL S. BERKEY 9 LYME STREET BOX WOOD, APT. #2 OLD LYME, CT 06371	RETIRED NONE	350.00	350.0
	MPS. J. LAURER LEGNARDI 80 CARTRIGHT STREET BRIDGEPORT. CT 06604	HOUSEWIFE SAME BRIDGEPORT. CT	250.00	250.0
7/28/80	MRS. KENNETH POE BALDWIN FARMS. NORTH	HOMEMAKER SAME GREENWICH. CT	250.00	250.0
7/03/80	DP. KARL HEYMAN MONA INDUSTRIES INC. PATERSON. NJ 07524	CHEMIST INFORMATION REQUESTED. BUT NOT RECEIVED FROM CONTRIBUTOR	400.00	200.0
1/24/80	MR. & MRS. THOMAS M. PETERS P.O. BOX 420 BERNAPDSVILLE: NJ 07924	RETIRED NONE	250.00	250.0
7/09/80	HIGH B. MERRILL BOX 30 R.D. 1 LARGER CROSS RD. GLADSTONE, NJ 07934	INFORMATION REQUESTED. BUT NOT RECEIVED FROM CONTRIBUTOR	1000.00	1000.

(LAST PAGE OF THIS PART ONLY)

#### PERIOD 07/01/80 - 07/31/80

## ITEMIZED RECEIPTS-CONTRIBUTIONS, SALES AND COLLECTIONS, LOANS, AND TRANSFERS

NCPAC	ME	PART NO	. 1. LINE NO	. 14A.
DATE	NAME, MAILING ADDRESS, AND ZIP CODE	OCCUPATION AND BUSINISS ADDRESS	46GR. REC	
37/10/80	MRS. ROBERT T. WEATHERILL	MOUSEWIFE SAME WOOOBURY, NJ	400.00	200.00 100.00 100.00
17/11/80	MR. E MRS. H. L. PITTENGER 616 RIVERWOOD AVENUE POINT PLEASANT BEACH, NJ 08742	NONE		25.00 50.00 50.00 100.00
	336 EAST 19TH STREET	BROKER INFORMATION REQUESTED, BUT NOT RECEIVED FROM CONTRIBUTOR	1000.00	1000.00
1K30/80	NEW YORK. NY 10004	INFORMATION REQUESTED, BUT NOT RECEIVED FROM CONTRIBUTOR	1000.00	1000.00
7/21/80	MPS. ROBERT LEE KOHNS 165 EAST 66TH STREET NEW YORK, NY 10021	PETIRED	500.00	500.00
	STANLEY V. CHESLOCK, JR. SISCOWIT ROAD POUND RIDGE, NY 10576	BANKER INFORMATION REQUESTED. BUT NOT RECEIVED FROM CONTRIBUTOR	500.00	500.00
	MAND CELLA 182-36 BOTH DRIVE JAMAICA ESTATES, NY 11432		500.00	500.00
1/07/80	MR. & MRS. HENRY U. HARRIS 55 BROOKVILLE ROAD GLEN HEAD. NY 11545	HOUSEWIFE SAME GLEN HEAD, NY	500.00	500.00
	DAVID W. MANDELKOW THE TIDES MOTOR INN BAYVILLE ROAD LOCUST VALLEY. NY 11560	RETIRED NONE	265.00	15.00 250.00

(LAST PAGE OF THIS PART ONLY)

#### BOMEDULE A

#### PERIOD 07/01/80 - 07/31/80

## TTEMIZED RECEIPTS-CONTRIBUTIONS. SALES AND COLLECTIONS. LOANS. AND TRANSFERS

HCPA	C MF	PART	NO. 1. LINE NO	. 144.
ATE	NAME, MAILING ADDRESS, AND ZIP CODE	OCCUPATION AND BUSINESS ADDRESS	AGGR. REC YTO. THI	
/31/80	MR. RAY S. WALKER BIGLER, PA 16825	INFORMATION REQUESTED. BUT NOT RECEIVED FROM CONTRIBUTOR	1000.00	1000.00
/22/80	MISS MARIE E. KENNEDY Bryn Mawr Teprace Bryn Mawr. Pa 19010	BACK BACK	250.00	250.00
(16/80	MRS. ROBERT G. ROWE 219 CURWEN ROAD ROSEMONT. PA 19010	HOUSEWIFE SAME ROSEMONT, PA	250.00	100.00
717/80 417/80	MR. JOHN M. TEMPLETON 601 PEMBROKE ROAD BRYN MAWR, PA 19010	SURGEON CHILDRENS HOSPITAL OF		
-/25/80	MPS. JOHN BRADLEY 2000 FAIRFIELD DRIVE WILMINGTON, DE 19810	RETIPED NONE	300.00	300.00
	P.D. BOX 989 GRUNDY, VA 24614	INFORMATION REQUESTED. BUT NOT RECEIVED FROM CONTRIBUTOR	4000.00	4000.00
(03/80	FLMER FIKE BOX 546 NITRO, WV 25143	FIKE CHEMICALS NITRO, WV	595.00	295.00 300.00
18/80	L. N. THOMAS 910 NEWTON POAD CHARLESTON, WV 25314	RETIRED NONE	300.00	200.00
	MP. W. E. JIM MARTIN PD BOX 3268 MARATHON. FL 33052	RETIRED NONE	300.00	100.00

TOTAL THIS PERIOD (LAST PAGE OF THIS PART ONLY)

## PERIOD 07/01/80 - 07/31/80

TYPHIZED RECEIPTS-CONTRIBUTIONS, SALES AND COLLECTIONS, LOAMS, AND TRANSFERS

NCPAC	C MF		PART NO. 1. LIN	CM 3	144.
16	NAME	MAILING ADDRESS. OCCUPATION AND AND ZIP CODE BUSINISS ADDRE		THIS	PERIOD
	P. 7.	SUZANNE BACHELLER ATTORNEY BOX 998 DELRAY BEACH, AY BEACH, FL 33444	FL	.00	15.00
15/80	920	FRANK BUTTERWORTH, JR. RETIRED SOUTH DCEAN BOULEVARD NONE ANA. FL 33460	1000	.00	250.00 500.00 250.00
18/80	800	SLYVIA TUREAUD HOUSEWIFE SOUTH COUNTY ROAD SAME BEACH, FL 33480 PALM BEACH, FL	250		250.00
!3/80	L185	POLITICAL ACTION COMM. RTY NAT'L LIFE INS. CO. INFORMATION RE BOX 2612 BUT NOT RECEIV INGHAM. AL 35202 FROM CONTRIBUT	<b>E</b> D	•00	500.00
	P.7.	GEORGE P. COCHRAN BOX 7447A INFORMATION RE INGHAM. AL 35223 BUT NOT RECEIV FROM CONTRIBUT	ED		100.00
!2/80	3713	EDWARD CAFFREY RETIRED WEST END AVENUE NONE VILLE, TN 37205	300	.00	300.00
9/80	LAKE	ERRILL HAPRIS GEOLOGIST LAND TOWERS, P.O. BOX 4545 SELF-EMPLOYED SON, MS 39216 1755 LEILA DRI JACKSON, MS 3		.00	1000.00
	700	F JOFL H. SHARP RETIRED HIGHLAND AVENUE NONE M. DH 44460	22!	.00	25.00 200.00
7/30	1565	CHARLES R. HOLTON, JR. BANKEP PORTAL DRIVE, N.E. UNION SAVINGS EN. OH 44484	& TRUST COMPANY	.00	250.00

(LAST PAGE OF THIS PART ONLY)

## PERIOD 07/01/80 - 07/31/80

ITEMIZED RECEIPTS--CONTRIBUTIONS, SALES AND COLLECTIONS, LOANS, AND TRANSFERS

NCPA	MF	PART NO.	1. LINE NO	144.
ATE	NAME, MAILING ADDRESS, AND ZIP CODE	OCCUPATION AND BUSINESS ADDRESS	AGGR. REC	S PERIO
7/03/80	LOUIS A. WEIL. JR. 21 ASH COURT LAFAYETTE, IN 47905	RETIRED NONE	1000.00	1000.0
/09/80	ALAN LODFBOUPROW 183 EAST LONG LAKE ROAD BLODMFIELD HILLS, MI 48013	CONSULTANT INFORMATION REQUESTED, BUT NOT RECEIVED FROM CONTRIBUTOR	250.00	250.0
<b>→</b> ,	MRS. DAN GERBER, SR. BOX 31 FREMONT, MI 49412		250.00	250.0
1710/80 N	CLINTON M. WELCH P.O. BOX 739 SAULT SAINTE MAR, MI 49783	PETIRED BACK	300.00	300.0
7/08/80 ਪੌਰ	A. D. HULINGS AND MARY HULINGS POINT ROAD BAYPORT, MN 55003	EXECUTIVE ANDERSEN CORPORATION BAYPORT, MN 55003	500.00	500.0
7/09/80	RUTH JOHNSON 3076 SHOR EWOOD LANE SAINT PAUL, MN 55113	PRESIDENT J C SYSTEM. INCORPORATED	1000.00	1000.0
7 <u>6</u> 14/80	MR. EUGENE D. BUCHANAN C/D GORDON BUCHANAN JR. 1630 SHERIDAN ROAD WILMETTE: IL 60091	PETIRED NONE	350.00	350.(
	HAZEL RUTHERFORD 5823 FOREST PARK DRIVE PEORIA, IL 61614	INFORMATION REQUESTED. BUT NOT RECEIVED FROM CONTRIBUTOR	500.00	500.
1/02/80	MP. G. A. BUDER, JR. BUDER BLDG. 7 N. 7TH ST. SAINT LOUIS. MD 63101	ATTOPNEY SAME SAINT LOUIS, MO	1000.00	1000.

(LAST PAGE OF THIS PART ONLY)

#### PERIOD 07/01/60 - 07/31/60

TTENIZED RECEIPTS-CONTRIBUTIONS. SALES AND COLLECTIONS, LOANS, AND TRANSFERS

NCPAC	ME	PART NO.	1. LINE NO	. 144.
_		DCCUPATION AND Business Address	AGGR. REC YTD. THI	EIPT AKT
102/00	LABCONCO CORPORATION 8811 PROSPECT AVENUE KANSAS CITY, MO 64132	INFORMATION REQUESTED, BUT NOT RECEIVED FROM CONTRIBUTOR	600.00	600.0
/18/80	ART KAAZ 1100 SOUTH BROADWAY LEAVENWORTH, KS 66048	BOX 207	250.00	250.0
	J. WESLEY ST. CLAIR SOUTHGATE BANK & TRUST CO. 7600 STATE LINE PRAIRIE VILLAGE, KS 66208	PRESIDENT STATELINE BANK & TRUST CO.		1000.0
(15/80 :		BUT NOT RECEIVED FROM CONTRIBUTOR	1000.00	1000.0
	CLINTON ST. CLAIR	INFORMATION REQUESTED.	300.00	300.0
03/80	7412 LAKESHORE DRIVE	OWNER INFORMATION REQUESTED. BUT NOT RECEIVED FROM CONTRIBUTOR	2003.00	2000.0
.'18/80	MO. WILLIAM ROBERTS 1240 SOUTH HAMPTON DRIVE ALEXANDRIA, LA 71301	PHYSICIAN 3330 MASONIC DRIVE	500.00	500.0
23/80	ARTHUR L. SMITH AGENCY P.O. BOX 8365 DALLAS. TX 75205	INFORMATION REQUESTED. BUT NOT RECEIVED FROM CONTRIBUTOR	250.00	250.0
21/80	TOMLIN PROPERTIES C/O D. O. TOMLIN. JR. 4009 WINDSOR DALLAS. TX 75205	PEALTOR TOHLIN PROPERTIES	500.00	500.0
****		TOTAL THIS PE		

#### PERIOD 07/01/80 - 07/31/80

ITEMIZED RECEIPTS--CONTRIBUTIONS. SALES AND COLLECTIONS. LOAMS. AND TRANSFERS

NCPAC		PART NO.	1. LINE NO.	144.
DATE	NAME. MATLING ADDRESS. AND ZIP CODE	OCCUPATION AND BUSINESS ADDRESS	AGGR. RECE YTD. THIS	
07/25/80		OIL PRODUCER ROY GUFFEY OIL COMPANY	250.00	250.0
07/03/80	ROBERTA H. PEW 3525 TURTLE CREEK BLVD #16BC DALLAS. TX 75219	BUT NOT RECEIVED	275.00	275.0
•		REALTOR TOMLIN PROPERTIES SAME	500.00	500.0
7 <b>U</b> ∴		INFORMATION REQUESTED. BUT NOT RECEIVED FROM CONTRIBUTOR	275.00	275.0
07410/80	MRS. PAGE NELSON 3318 SOUTHWESTERN BOULEVARD DALLAS, TX 75225	RETIRED NONE	525.00	500.0 25.0
07/18/89 07/21/80 07/21/80	MP. 6 MRS. HARRY LEWIS 1104 AZALEA DRIVE LONGVIEW: TX 75601	LONGVIEW, TX 75601	240.00	80.0 80.0
07/01/80	BOUTE 1 BOY 116	HOUSEWIFE Same Colmesneil. Tx	540.00	25.0 15.0
07/28/80		PETROLEUM CONSULTANT PETROLEUM CORP. OF TEXAS BRECKENRIDGE. TX		500.0
07/29/80	CYRUS K. RICKEL 2831 F.W.N. BANK BUILDING FORT WORTH, TX 76102	PANCHER SELF-EMPLOYED	1000.00	1000.0

TOTAL THIS PERIOD -

#### PERIOD 07/01/80 - 07/31/80

TTEMIZED RECFIPTS-CONTRIBUTIONS, SALES AND COLLECTIONS, LOANS, AND TRANSFERS

NCPA	C MR	PART NO.	1. LINE NO.	144.
DATE	NAME, MAILING ADDRESS, AND ZIP CODE	OCCUPATION AND BUSINESS ADDRESS	AGGR. RECE VTD. THIS	IPT AK
07/31/80	DR. W. S. LORIMER, JR. 1937 KENSINGTON DRIVE FORT WORTH, TX 76110			250.0
07/11/80	HOWARD L. TERRY 600 JEFFERSON, SUITE 1600 HOUSTON, TX 77002	INFORMATION REQUESTED. BUT NOT RECEIVED FROM CONTRIBUTOR	500.00	500.0
07/22/80 O			250.00	250.0
07/22/80 Sn	APTHUR E. W. BARRETT. JR. 1602 TRANSCO TOWER HOUSTON, TX 77056	OIL PRODUCER		500.0
07/15/80	C. L. BENGE P.O. BOX 38038 HOUSTON, TX 77088	ACCOUNTANT TREES, INCORPORATED	400.00	400.0
07/14/80	MPS. JACK FROST 1802 NATL. BANG OF COMM. BLDG. SAN ANTONIO. TX 78205	BUT NOT RECEIVED	250.00	250.0
07/23/80	MRS. GEORGE B. MUEERER	HOUSEWIFE Same		800.0
7/14/80	JOHN B. ARMSTRONG P.O. BOX 193 KINGSVILLE: TX 78363	RANCHER INFORMATION REQUESTED. BUT NOT RECEIVED FROM CONTRIBUTOR	2000.00	2000.0
37/01/80	MR. DOUGLAS L. CONE PD BDX 6217 LUBBDCK. TX 79413	PHYSICIAN SELF-EMPLOYED	500.00	500.0

TOTAL THIS PERIOD (LAST PAGE OF THIS PART ONLY)

#### PERIOD 07/01/80 - 07/31/80

## ITEMIZED RECEIPTS-CONTRIBUTIONS. SALES AND COLLECTIONS. LOAMS. AND TRANSFER:

NCPAC MF		PART NO. 1. LINE NO.		144
DATE	NAME, MAILING ADDRESS. AND ZIP CODE	OCCUPATION AND BUSINESS ADDRESS	AGGR. RECE VTD. THIS	
07/29/80	NP. J. A. STEWART ROUTE 3 NAMPA, ID 83651	INFORMATION REQUESTED. BUT NOT PECEIVED ROTHORIBUTOR	250.00	250
07/07/80	ROBERT S. BOHRER 2801 STARLINGTON 8015E. 10 83706	BUSINESS EXECUTIVE INFORMATION REQUESTED. BUT NOT RECEIVED FROM CONTRIBUTOR	500.00	500
07/,07/80	MR. J. K. WHEELER 330 WEST 21ST STREET SALT LAKE CITY. UT 84115	RANCHER 330 WEST 21ST SOUTH STREET SALT LAKE CITY. UT 84115	500.00	500
•	MP. DOUGLAS SIMONSON 8711 EAST PINNACLE PARK ROAD SCOTTSDALE, AZ 85255	SALESMAN SCOTTSDALE, AZ	250.00	250
	ELSA W. MARK 4935 EAST JULIA STREET TUCSON: AZ 85716	INFOPMATION REQUESTED. BUT NOT RECEIVED FROM CONTRIBUTOR	350.00	250 100
	LFONARD W. HARDY 3809 EAST, HIGHWAY 66 KINGMAN, AZ 86401	SELF EMPLOYED 3809 EAST, HIGHWAY 66 KINGMAN, AZ	550.00	200 350
07/21/80	ROY B. THOMPSON PO DRAWER, SOUTH SANTA FE, NM 87501	RANCHER PO DRAWER, SOUTH SANTA FE, NM 87501	500.00	500
07/31/80	E. R. LAPERRUQUE, SR. 818 SOUTH RIMPAU BOULEVARD LOS ANGELES, CA 90005	SWAMFOCK SERVICES INCOPORA LOS ANGELES. CA	TION 500.00	500
07/01/80	ROBERT JAMES LIKES SUITE 202 15130 VENTURA BOULEVARD SHERMAN DAKS. CA 91403	INFORMATION REQUESTED. BUT NOT RECEIVED FROM CONTRIBUTOR	250.00	250

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TOTAL THIS PERIOD (LAST PAGE OF THIS PART ONLY) -----

## SCHEDULE A - 1 -

#### PERIOD 07/01/80 - 07/31/80

ITEMIZED RECEIPTS--CONTRIBUTIONS, SALES AND COLLECTIONS, LOANS, AND TRANSFERS

NCPAC	MF	PART NO.	1. LINE NO.	144.
ATE	MAME, MAILING ADDRESS, AND ZIP CODE	OCCUPATION AND BUSINESS ADDRESS	AGGR. RECE	
/31/80	MR. R. A. AXLINE BOX 1874 RANCHO SANTA FE, CA 92067	RETIRED NONE	250.00	250.00
/15/80	REX SCRIPPS CLARK 7460 HERSCHEL AVENUE SAN YSIDRO. CA 92073	RETIRED NONE	300.00	300.00
	H. JAMES HOPKINS 14265 TYLER ROAD VALLEY CENTER, CA 92082	FARMER NONE	350.00	350.00
£28/80	ANNA CAMPBELL P.O. BOX 70 WARNER SPRINGS. CA 92086	RETIRED NONE	500.00	500.00
/16/80	GRACE V. NAYLOR 896-8 RONDA SEVILLA LAGUNA HILLS. CA 92653	RETIRED	250.00	100.00 100.00 50.00
-	MR. & MRS. FRANK KELLER 433 CALIFORNIA STREET SAN FRANCISCO. CA 94104	RETIRED NONE	300.00	300.00
	MR. DAVID D. BOHANNON	BUSINESS EXECUTIVE INFORMATION REQUESTED, BUT NOT RECEIVED FROM CONTRIBUTOR	500.00	500.00
./17/80	BAY AREA CONCRETES. INC. C/O JAMES C. SYNDER PO BOX 1728 FREMONT. CA 94538	PRESIDENT FREMONT, CA	250.00	250.0
/15/80	MR. 6 MRS. HERMAN TIJSSELING 665 LANCASTER ROAD WALNUT CREEK. CA 94595	CONTRACTOR 665 LANCASTER ROAD WALNUT CREEK, CA 94595	250.00	250.0
/15/80	DON R. SCHLEICHER 10 TOWER POINT LANE TIBURDN. CA 94920	INFORMATION REQUESTED. BUT NOT RECEIVED FROM CONTRIBUTOR	500.00	500.0

TOTAL THIS PERIOD
(LAST PAGE OF THIS PART ONLY)

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## PERIOD 07/01/80 - 07/31/80

ITEMIZED RECEIPTS-CONTRIBUTIONS, SALES AND COLLECTIONS, LOAMS, AND TRANSFERS

17 61	MIZED RECEIPTSCONTRIBUTIONS.	SALES AND COLLECTION	45, LOAMS, AMO 1	RANSFERS
NCPA	C MF	PI	SMIL .L .CH TAL	NO. 144.
DATE		DCCUPATION AND Business Address		ECEIPT AF
07/24/80	165 BLOSSOM HILL ROAD SP24 SAN JOSE, CA 95123		300.0	300.
07/01/80	MR. & MRS. EDWARD A. O'NEILL	HOUSEWIFE SAME HONDLULU, HI	250.0	250.( ) <b>0</b>
07/15/80	MP. JOHN A. WINTERS 7623 SE SALMONT STREET PORTLAND, OR 97214	RETIRED NONE	250.0	250.(
6		TOTAL TOTAL TOTAL TOTAL T	THIS PERIOD PART ONLY)	50,530.(
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POSSIBLE CORPORATE CONTRIBUTIONS (6 for \$3,100)



# FEDERAL ELECTION COMMISSION WASHINGTON BC 27th

October 20, 1980

Susan S. Hannegan, Treasurer Mational Conservative Political Action Committee 1500 Wilson Blwd. Suite 513 Arlimaton, VA 22209

Identification No: C00024687

Reference: August Monthly Amendment (7-1-80 to 7-31-80)

Dear Rs. Mannegan:

This letter is prompted by the Commission's preliminary review of your August Monthly Amendment. The review raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act. Amitemization of these areas follows:

-Schedule A of your report (pertinent portion attached) discloses apparent contributions from corporations. You are advised that contributions from corporations are prohibited by 2 U.S.C. 441b, unless made from separate segregated funds established by the corporations. If you have received corporate contributions, the Commission recommends that you refund the full amounts to the donors. (Any refunds should appear on Line 26 of Schedule B on your next report.)

If you find that sources of the contributions are permissible and were disclosed incorrectly or incompletely on your report, please amend your original report with the clarifying information.

Although the Commission may take further legal steps concerning the acceptance of a prohibited contribution, your prompt refund of the contribution to the donor will be taken into consideration by the Commission.

An amendment to your original report correcting the above problems should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel

Sesan S. Hannegen Mational Conservative Political Action Committee 2

free to contact me on our toll free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,

Marci

Mark Kleinman Reports Analyst Reports Analysis Division

]	PAC ME			
1	MANE, MATLING ADDRESS, AND ZIP CODE	OCCUPATION AND BUSINESS ADDRESS	MO. 1. LINE M	CEIPT AN
	80 MR. GEORGE C. WALSH 42 GRAWITE STREET FOXBORO, MA 02035	TREASURER CLIFFEX BELLOWS CORP. 45 WEST 3RD STREET BOSTON, MA 02127	250.00	250.00
	1075 PROVIDENCE HIGHWAY SHARON, NA 02067	IMPORMATION REQUESTED. BUT NOT RECEIVED FROM CONTRIBUTOR		1000.00
8	O TATE BROWN UNDERMOUNTAIN ROAD SALISBURY, CT COCKE	SALESMAN ELMCREST GROWERS		250.00
	O ADMIRAL RUSSEL S. DERKEY 9 LYME STREET BOX HOOD. APT. 6 OLD LYME. CY 06371	RETIRED 2 NONE		350.00
<b>~~</b>	D MRS. J. LAURER LECYARDI 60 CARTRIGHT STREET BRIDGEPORT, CT 06604	HOUSEWIFE SAME BRIDGEPORT. CT	350.00	250.00
·	MAS. KENMETH ROS BALDWIN FARMS. HORTM GREENWICH. CT 06020	HOMEMAKER SAME GREENWICH. CT		250.00
3	PATERSON, NJ 07524	CHEMIST INFORMATION REQUESTED. BUT NOT RECEIVED	250.00	200.00
7/24/80	MW. & MRS. THOMAS W. PETERS P.D. BOX 420 RERNARDSVILLE, NJ 07924	FROM CONTRIBUTOR RETIRED NONE	400.00	250.00
7/09/80	HIGH B. MERRILL BCX 30 R.D. 1 LARGER CROSS RD. GLADSTONE, NJ 07934	The same of the sa	250.00	
	OLADSTONE, NJ 07934	INFORMATION REQUESTED. BUT NOT RECEIVED FROM CONTRIBUTOR	1000.00	1000.00
		CLAST DAGE TOTAL THIS PL	FR 100	

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#### FERIOD 07/01/00 - 07/31/00

THEN IZED RECEIPTS-CONTRIBUTIONS. SALES AND COLLECTIONS. LOAMS. AND TRANSPERS

HCPA	106	PART NO.	1. LINE NO	. 144.
DATE	MAME, MAILING ACCRESS, AND ZIP CODE.	CCCUPATION AND BUSINESS ADDRESS	AGGR. REC	
7/03/80	LABCONCO CORPORATION BELL PROSPECT AVERUE HANSAS CITY, NO 64132	INFCRNATION REQUESTED, BUT NOT RECEIVED FROM CONTRIBUTOR	400.00	600.00
7/18/80	YANGADER HTURE COLL BAGGE ZH WITSCHMEVAEL	80X 207	250.00	250.00
7/03/80	J. WESLEY ST. CLAIR SOUTHGATE BANK & TRUST CO. 7600 STATE LINE PRAIRIE VILLAGE. RS 66208	PRESIDENT STATELINE DANK & TRUST CO.	1000.00	1000.00
10	ALTON OCHSNER 3525 NORTH CAUSEVAY BLVD6601 METAIRIE, LA 7002	INFCRMATION REQUESTED, BUT NOT RECSIVED FROM CONTRIBUTOR	1000.00	1000.00
	CLINTON ST. CLAIR BOX 8753 METAIRIE, LA 70011	INFORMATION REQUESTED. BUT NOT RECEIVED FROM CONTRIBUTOR	300.00	300.00
	HAL HALTER 7412 LAKESHORE DRIVE NEW ORLEANS. LA 70124	OWNER INFCRMATION REQUESTED. BUT NOT RECEIVED FROM CONTRIBUTOR	2003.00	2000.00
./18/80	MR. WILLIAM ROBERTS 1240 SOUTH HAMPTON DRIVE ALEXANDRIA, LA 71201	PHYSICIAN 3330 MASONIC DRIVE	500.00	500.00
23/80	P.O. BOX 8365 OALLAS. TX 75205	INFCRMATION REQUESTED. BUT NOT RECEIVED FROM CONTRIBUTOR	250.00	250.00
•-	TOMLIN PROPERTIES C/O D. 7. TOMLIN. JR. 4009 MINOSON DALLAS. TX 75205	PEALTOR TOMLIN PROPERTIES	500.00	500.00

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#### PTRICO 07/01/80 - 07/31/80

ITENTIZED RECEIPTS-CONTRIBUTIONS. SALES AND COLLECTIONS. LOAMS. AND TRANSPERS

HCPAC	, MP	PART NO.	1. LIME NO.	144.
DATE	MAME, MATELING ADDRESS. AND ZIP CODE	OCCUPATION AND BUSINESS ADDRESS	AGGR. RECEIVED. THIS	
7/25/80	P. ROY GUFFEY 1116 CHE EYERGY SCUAPE 4925 GREENVILLE AVEXUE DALLAS, TX 75206	OTL PRODUCER ROY GUFFEY OIL COMPANY	250.00	250.00
7/03/40	ROBERTA H. PEW 3525 TURTLE CREEK BLVD #1686 DALLAS. TX 75219	INFORMATION REQUESTED. BUT NOT RECZIVED FROM CONTRIBUTOR	275.00	275.00
7/21/00	TOULIN PROPERTIES C/O O. O. TOWLIN TWO TURTLE CREEK VILLAGE DALLAS, TX 75219	REALTOR TOMLIN PROPERTIES SAME	500.00	500.00
17/23/80	JOHN G. PEW P.O. 80% 2380 DALLAS. TX 75221	INFORMATION REQUESTED. BUT NOT RECEIVED FROM CONTRIBUTOR	275.00	275.00
17/09/80	MRS. PAGE NELSON 3318 SOUTHWESTERN BOULEVARD DALLAS. TX 75225	RETIRED NONE	525.00	500.0
17721/80	MP. E MRS. MARRY LEWIS 1104 AZALEA DRIVE 1 CONGVIEW. TX 75601	PRESIDENT L. & G. OIL COMPANY LONGVIEW. TX 75601	240.00	80.0 80.0
7/09/80	MRS. L. J. WHITMEYER, JR. PRUTE 1. BOX 110 COLMESNEIL, TX 75938	HOUSEWIFE Same Colmesneil. Tx	540.00	25.0 15.0 500.0
1/28/80	DO. M. REAUGH 304 NORTH HARDING BRECKENRICGE, TX 76024	PETROLEUM CONSULTANT PETROLEUM CORP. OF TEXAS BRECKEMRIDGE, TX	500.00	500.0
7/29/80	O CYRUS K. PICKEL 2001 F.W.N. BANK BUILDING FORT WORTH, TX 76102	PANCHER SELF-EMPLOYED	1000.00	1000.0
		TOTAL THIS P	ERIOD CRLY)	

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## PERIOD 07/01/30 - 07/21/00

STEMIZED RECEIPTS-CONTRIDUTIONS. SALES AND COLLECTIONS. LOAMS. AND TRANSPERS

NCPA	C NP	PART NO.	1. LINE NO.	144.
DATE	MAME, MAILING ACCRESS, BCCD 413 CMA	CCCUPATION AND BUSINESS ADDRESS	Acck. Rece TVO. THIS	
07/31/00	MR. R. A. BYLINE BOX 1874 RANCHO SANYA PE, CA 92067	RETIRED NOME	250.00	250.6
07/15/80	REX SCRIPPS CLARK 7460 MERSCHEL AVENUE SAN YSIDRO: CA 92078	RETIRED HOME	300.00	303.6
07/28/80	M. JAMES HOPKIMS 14265 TYLER BOAD VALLEY CENTER. CA 92088	PARMEA NOXE	350.00	350.0
07628/80	AMMA CAMORELL P.O. BOX 70 WARNER SPRINGS. CA 92086	RETIRED NONE	500.00	500.0
57/16/80 57/17/60	GRACE V. HAYLER 891-8 RONCA SEVILLA LAGURA HILLS. CA 92653	RETIRED MONE	250.00	100.0 102.0
07/29/80	MR. & MRS. FRANK XELLER 433 CALIFORNIA STRUET SAM FRANCISCO. CA 94104	RETIRED MONE	300.00	300.6
07/14/80	MR. DAVID D. BOMMANDE 60 HILLSDALE MALL SAN MATED. CA 94403	BUSINESS EXECUTIVE INFORMATION REQUESTED. BUT NOT RECEIVED FROM CONTRIBUTOR	500.00	500.6
07/17/80	BAY AREA CONCRETES, INC. C/O JAMES C. SYNORR PO BOX 1728 FREXONT. CA 94538	PRESIDENT FRENDAT. CA		250.6
07/15/80	MP. E MRS. MERMAN TIJSSELING 665 LANGASTER ROAD HALNUT CREEK. CA 94595	CONTRACTOR 665 LANCASTER ROAD WALHUT CREEK, CA 94595	250.00	250.0
07/15/80	DON R. SCHLETCHER 10 TOKER POINT LAND TIBURDN. CA 94920	IMPORMATION REQUESTED. BUT NOT RECEIVED FROM CONTRIBUTOR	503.00	500.0

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AUGUST MONTHLY AMENDMENT (7-1-80 to 7-31-80)
RESPONSE TO RFAI

SHOWING ITEMIZED CONTRIBUTORS (\$40,530)

NOTE: THIS AMENDMENT CHANGES THE TOTAL OF ITEMIZED CONTRIBUTORS BY \$10,000. ORIGINALLY THE FIGURE WAS \$50,530, NOW IT IS \$40,530. NOT INCLUDED IN THIS AMENDMENT ARE \$2,850 IN CORPORATE CONTRIBUTIONS AND \$7,150 IN CONTRIBUTIONS FROM INDIVIDUALS. THERE IS STILL A CORPORATE CONTRIBUTION LISTED FOR \$250.

# National Conservative DELIVERED Political Action Committee

1500 wilson blvd. suite 513 arlington, va. 22209 (703) 522-200

October 27, 1980

Mr. Mark Kleinman Reports Analyst Report Analysis Division Federal Election Commission 1325 K Street, JW Washington, D.C. 20463

Dear Mr. Kleinman:

had a constitution and the series

This letter is in response to your letter dated October 20, 1980 which questioned certain information filed in our August Monthly Amendment (7-1-80 to 7-31-80). Earlier this year our computer service was, for some unexplained reason, combining our contributor information with that of some of their other clients. This is obviously what happened, because upon my investigation of the contributions you had questioned. I have found that not only those but several other contributions listed on that report was not received or deposited by this committee. We have changed computer services since that time and hopefully we will not be experiencing these problems in the future.

Attached you will find an amendment to our August Monthly Report (7-1-80 to 7-31-80). If you should have any further questions, please don't hesitate to contact me.

Sincerely,

Susan S. Hannegan Treasurer

SSil: nkm

REPORT OF RECEIPTS AND DISBURSEMENTS HAND DELL'ERED.
For a Political Committee Other Than an Authorized Committee

	(Summary Page)	. ~ 00	5.32
Name of Committee (in Full)	1 4. TYPE OF	REPORT tcheck appropri	
National Conservative Political Action Committee	1	pril 15 Quarterly Report	
Politica instant commerce	1 6	uly 15 Cuarterly Report	. •
Address (Number and Street)		October 15 Quarterly Repo	Pri
1500 Wilson Blvd. Suite #513		anuary 31 Year End Repo	wt .
Suite #313		luly 31 Mid Year Report (	Non-election Year Only)
City, State and ZIP Code	- ES	Monthly Report for	ly 1980
Arlington, VA 22209		Twelfth day report preced	
Check if address is different than previously report		election on i	Type of Election) In the State of
2. FEC Identification Number		Thirtieth day report follow	ving the General Election
C00024687		on in the	e State of
3. P. This committee qualified as a multicandidate com-		Termination Report	
mittee during this Reporting Pariod on (date)	(b) is t	his Report an Amendmen YES XI	17 NO
SUMMARY	21 00	Column A This Period	Column B Calendar Year-to-Date
5. Covering Period 7-1-80 Through 7-	-31-80		
6. (a) Cash on Hand January 1, 19.80.	•••••••••••••••••••••••••••••••••••••••		\$ 45,259.17
(b) Cash on Hand at Beginning of Reporting Period	• • • • • • • • • • • • • • • • • • • •	\$111.780.27	
(c) Total Receipts (from Line 18)	• • • • • • • • • • • • • • • • • • • •	\$475,447.54	s 2,491,171.78
(d) Subtotal (add lines 6(b) and 6(c) for Column A lines 6(a) and 6(c) for Column B)	• • • • • • • • • • • • • • • • • • • •		s 2,536,430.95
7. Total Disbursements (from Line 28)	• • • • • • • • • • • • • • • • • • • •	\$358,627.47	s 2,307,830.61
8. Cish on Hand at Close of Reporting Period (subtreat	t line 7 from G(d))	\$228,600.34	\$ 228,600.34
Dehts and Coligations Owed TO the Committee     (Itemize all on Schedule C or Schedule D)		s 9556.20	
10. Dobts and Obligations Owed BY the Committee (Iteraize all on Schedule Clar Schedule D)			1 1 1 3 3 3 1 1 1 1 1 1 3
Ecercity that E have examined this flepare and to the base of militis true, correct and complete.	ny Finandadae and <del>bol</del> let		information, contact:
Susan S. Hannegan		Toll Fee	Election Commission re 800-474-9530 02-523-4058
Type or Print Harris of Treasurer	/	/	•
Susan & Hurringer	E/22/	180	•
NOTE: Submission of false, error-bus, or incomptise info	orination they subject the	ntrion Coing this Report t	o the penalties of 2 U.S.* \$43
All previous explored that	3 a of the FORM Cook	renet on bluefathous status in	r he used,
	1		FICE DIVISION DE

#### DETAILED SUMMARY PAGE of Receipts and Disburnments (Page 2, FEC FORM 3X)

National Conservative Political Action Committee	Report Covering the Period From: 7/1/80	7/31/80
	COLUMN A Tetal This Period	COLUMN B Calmda Yearto-Date
I. RECEIPTS	Visit Single Con	SCHOOL STATE
11.CONTRIBUTIONS (either than loans) FROM:	472,977.93	2,476,094.79
(a) Individuals/Persons Other Than Political Committees		
Brema Entry Uniternited S. 482.447 , 93		•
(b) Political Party Committees.	••••	
fc) Other Political Committees	472 077 02	2 476 004 70
BITOTAL CONTRIBUTIONS (other than tomat (sed 11s, 11b and 11c)	472,977.93	2,476,094.79
12.TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES	· · · · · · · · · · · · · · · · · · ·	1
1).ALL LOANS PECEIVED	l	1
14, LOAN REPAYMENTS RECEIVED	2,469.61	3,400.00
15.0FFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	2,469.61	11,676.99
16, REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES		
17.0THER RECEIPTS (Dividends, Interest, etc.)		!
18.TOTAL RECEIPTS (Add 11d, 12, 13, 14, 15, 16 and 17)	475,447.54	2,491,171.78
II. DISBURSEMENTS	212,673.36	1,397,303.41
19.0PERATING EXPENDITURES		1
20, TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES		<del> </del>
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES.	5,976.77	91,696.71
72.INDEPENDENT EXPENDITURES (Use Schedule E)	139,977.34	817,159.49
23.COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. \$419(d)) (UM Schedulf F)		
24.LCAN REPAYMENTS MADE	.	
75.LOANS MADE		1
20.HEFUNDS OF CONTRIBUTIONS TO:		
(a) Individuals/Persons Other Than Political Committees		1,671,00
fol Political Party Committees	. <b>.</b>	
fc) Other Political Committees		
(a) TOTAL CONTRIBUTION REPUNDS (add 20), 205 and 26c)		1,671.00
27.OTHER DISCURSEMENTS		
23.TOTAL DISBURSEMENTS (Add Lines 10, 20, 21, 22, 23, 24, 25, 26d and 27)	358,627.47	2,307,830.6
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES		
20.TOTAL CONTRIBUTIONS to ther than to arist from Line 11d	472,977.93	2,476,094.79
20.TOTAL CONTRIBUTION HERUNDS from Line 264	-0-	1,671.00
31. NET CONTRIBUTIONS (other than town) (setting the 30 from Line 20)	472,977.93	2,477,765.79
32.TOTAL OPERATING EXPENDITURES from time 19	212,673.36	1,397,303.4
	2,469.61	11,676.9

#### PERIOD 07/01/80 - 07/31/80

ITEMIZED RECEIPTS--CONTRIBUTIONS. SALES AND COLLECTIONS. LOAMS. AND TRANSFERS

MIPAC	4=	PART NO.	1. LINE NO.	144.
ŅΑΤĘ	NEME: MAILING ADDRESS: AND ZIP CODE	OCCUPATION AND BUSINESS ADDRESS	AGGR. RECE YTD. THIS	
	42 GRANITE STREET	TREASURER CLIFFEX BELLOWS CORP. 45 WEST 3RD STREET BOSTON. MA 02127	250.00	250.0
	CAOR MIATMUCHRECHU	SALESMAN ELMCREST GROWERS MARBLE DALE, CT 06068	250.00	250.0
c	ADMIPAL RUSSEL S. BERKEY 9 LYME STREET BOX HODD. APT.#2 OLD LYME. CT 06371	RETIRED NONE	350.00	350.0
57/21/80 =-	MPS. J. LAURER LECNARDI 80 CAPTRIGHT STREET BRIDGEPORT, CT 06604	HOUSEWIFE SAME BRIDGEPORT, CT	250.00	250.0
	MRS. KENNETH POE BALDWIN FARMS. NORTH GREENWICH. CT 06830	HOMEMAKER SAME GREENWICH. CT	250.00	250.0
		CHEMIST INFORMATION REQUESTED. BUT NOT RECEIVED FROM CONTRIBUTOR	400.00	200.
07/24/80	MR. & MRS. THOMAS M. PETERS P.O. BOX 420 RERNAPOSVILLE. NJ 07924	RETIPED NONE	250.00	250.
07/09/80	FUSH B. MERPILL BOX 30 R.D. 1 LARGER CROSS PD. GLADSTONE, NJ 07934		1000.00	1000.
14				

TOTAL THIS PERIOD (LAST PAGE OF THIS PART ONLY)

#### PEP100 07/01/80 - 07/31/80

ITEMIZED RECEIPTS--CONTRIBUTIONS. SALES AND COLLECTIONS. LOANS. AND TRANSFERS

	NCPA	, MF	PART NO.	1. LINE NO	144.
Di	\~E	NAME. MAILING ADDRESS. AND ZIP CODE	DCCUPATION AND BUSINESS ADDRESS	AGGR. RECE	
77	/10/80	HRS. ROBERT T. WEATHERILL 442 MYRTLE AVENUE HOODBURY, NJ 08096	HOUSEWIFE SAME WOODBURY, NJ	400.00	200.0 100.0 100.0
707	/11/80	MR. & MPS. H. L. PITTENGER 616 RIVEPWOOD AVENUE POINT PLEASANT BEACH, NJ 08742	RETIPED NONE	225.00	25.0 50.0 50.0 100.0
8	^	VINCENT TESE 336 EAST 19TH STREET NEW YORK, NY 10003	BROKER INFORMATION REQUESTED. BUT NOT RECEIVED FROM CONTRIBUTOR	1000.00	1000.0
οZ		MP. & MPS. JOHN C. WHITEHEAD 55 BROAD STPEFT NEW YORK. NY 10004	BANKER INFORMATION REQUESTED. BUT NOT RECEIVED FROM CONTRIBUTOR	1000.00	1000.0
07	(/21/80	MRS. ROBERT LEE KOHNS 165 SAST 66TH STREET NEW YORK, NY 10021	PETIRED NONE	500.00	500.0
₹.	709/80	STANLEY V. CHESLOCK. JR. SISCOWIT ROAD POUND RIDGE. NY 10576	BANKER INFORMATION REQUESTED. BUT NOT RECEIVED FROM CONTRIBUTOR	500.00	<b>500.</b> 0
27	7/15/8	D MAND CELLA 182-36 BOTH DRIVE JAMAICA ESTATES. NY 11432	INFORMATION REQUESTED. BUT NOT RECEIVED FROM CONTRIBUTOR	500.00	500.0
0	7/07/8	O MP. & MRS. HENRY U. HARRIS 55 BPOOKVILLE ROAD GLEN-HEAD. NY 11545	HOUSEWIFE Same Glen Head. Ny	500.00	<b>500.</b> 0
		O DAVID W. MANDELKOW O THE TIDES MOTOR INN BAYVILLE ROAD LOCUST VALLEY, NY 11560	RETIRED NONE	265.00	15.0 250.6
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#### PERIOD 07/01/80 - 07/31/80

TTEMIZED RECEIPTS--CONTRIBUTIONS. SALES AND COLLECTIONS, LOANS, AND TRANSFERS

NCPAC	: MF	PART NO. 1.	LINE NO.	. 144.
DATE	NAME. MAILING ADDRESS. AND ZIP CODE	OCCUPATION AND AG BUSINESS ADDRESS YT	GR. RECE	EIPT AT
07/31/80	MR. RAY S. WALKER BIGLER. PA 16925	INFORMATION REQUESTED. BUT NOT RECEIVED FROM CONTRIBUTOR 1	1002.00	1000.
07/22/80	MISS MARIE F. KENNEDY Boyn Mawr Teprace Boyn Mawr. Pa 19010	NONE NONE	250.00	<b>2</b> 50•¢
07/16/80	MRS. ROBERT G. ROWE 219 CURHEN ROAD ROSEMONT. PA 19010	SAME	250.00	100. 150.6
	) MR. JOHN M. TEMPLETON ) 601 PEMBROKE ROAD BRYN MAMP. PA 19010	SUPGEON CHILDRENS HOSPITAL OF PHILA.	700.00	200.0
07/25/80	D MRS. JOHN BRADLEY 2000 FAIRFIELD DRIVE WILMINGTON. DE 19810		300.00	300.0
	D FLMER FIKE BOX 546 NITRO, WV 25143	FIKE CHEMICALS ' NITRO, WV	295.00	<b>295.</b> 0
	D L. N. TYDMAS D 910 NEWTON POAT CHARLESTON: WV 25314	RETIPED MONE	300.00	
	O MP. W. E. JIM MARTIN O PO BOX 3268 MARATHON. FL 33052	PETIPED NONE	300.00	100.C 200.C

TOTAL THIS PERIOD (LAST PAGE OF THIS PART ONLY)

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#### PEP100 07/01/80 - 07/31/80

ITEMIZED RECEIPTS--CONTRIBUTIONS. SALES AND COLLECTIONS. LOANS, AND TRANSFERS

NCPAC	ЧЕ	PART N	10. 1. LINE NO.	144.
DATE		DCCUPATION AND BUSINESS ADDRESS	AGGR. RECE YTD. THIS	
		ATTORNEY DELRAY BEACH, FL	315.00	15.0 300.0
7/15/80	MO. FRANK BUTTERWORTH, JP. 920 SOUTH DCEAN BOULEVARD LANTAMA, FL 33460	RETIRED NONE	1000.00	250.0 500.0 250.0
7/28/90		HOUSEWIFE SAME PALM BEACH. FL	250.00	250.0
	FED. POLITICAL ACTION COMM. LIBERTY NAT'L LIFE INS. CO. P.D. BOX 2612 BIRMINGHAM. AL 35202	INFORMATION PEQUESTED. BUT NOT RECEIVED FROM CONTPIBUTOR	500.00	500.0
	MR. GEDPSE P. COCHRAN P.O. BOX 7447A BIRMINGHAM, AL 35223	INFORMATION REQUESTED. BUT NOT RECEIVED FROM CONTRIBUTOR	1100.00	100.0 1000.0
	MR. EDWARD CAFFREY 3713 WEST END AVENUE NASHVILLE, TN 37205	RETIPED NONE	300.00	300.0
7,409/80	P. MERRILL HAPRIS LAKELAND TOWERS, P.O. BOX 4545 JACKSON, MS 39216	1755 LEILA DRIVE	1000.00	1000.0
	JUDGE JOEL H. SHARP 700 HIGHLAND AVENUE SALEM. DH 44460	RETIRED NONE	225.00	25.0 200.0
7/17/99	D MR. CHARLES R. HOLTON, JR. 1565 PORTAL DRIVE, N.E. KARREN, OH 44484		COMPANY 250.00	<b>250.</b> 0
4				

TOTAL THIS PERIOD (LAST PAGE OF THIS PART ONLY)

#### PERIOD 07/01/80 - 07/31/80

ITEMIZED RECEIPTS--CONTRIBUTIONS, SALES AND COLLECTIONS, LOANS, AND TRANSFERS

NCPA	C MF	OCH TRAG	1. LINE NO.	144.
DATE	NAME, MAILING ADDRESS. AND ZIP CODE	OCCUPATION AND BUSINESS ADDRESS	AGGR. RECE YTD. THIS	IPT A'
7/03/80	LDUIS A. WEIL. JR. 21 ASH COURT LAFAYETTE. IN 47905	RETIRED NONE	1000.00	1000.
7/09/80	ALAY LODEROUPPOW 183 FAST LONG LAKE ROAD BLOOMFIELD HILLS: MI 48013	CONSULTANT INFORMATION PEQUESTED.	250.00	250.
	MES. DAN GERBER, SR. BOX 31 FPEMONT, MI 49412		250.00	250.
4 6	CLINTON M. WELCH P.D. BDX 739 SAULT SAINTE MAR. MI 49783	RETIRED None	300.00	300.0
7/08/80	DA. D. HULINGS AND MARY HULINGS POINT ROAD BARPORT, NN 55003	EXECUTIVE ANDERSEN CORPORATION BAYPORT, MN 55003	500.00	500.€
7/09/80	NCZNHOL HTUS O SUR SCORE SCHOL BANE SIIS NM , JUAY TNIAZ	PRESIDENT J C SYSTEM. INCORPORATED	1000.00	1000.
7/14/8	D MR. EUGENE D. BUCHANAN C/O GORDON BUCHANAN JR. 1630 SHERIDAN ROAD WILMETTE, IL 60091		350.00	350.(
7/09/8	O HAZEL RUTHERECRD 5823 FOREST PARK DRIVE PRORIA, IL 61614	BUT NOT RECEIVED	507.00	500.0
27/02/8	O MP. G. A. BUDER, JR. BUDER BLOG. 7 N. 7TH ST. SAINT LOUIS, MO 63101	ATTOPNEY SAME SAINT LOUIS. MO	1000.00	1003.0

TOTAL THIS PERIOD (LAST PAGE OF THIS PART ONLY)

#### PFP100 07/01/80 - 07/31/80

ITEMIZED RECEIPTS--CONTRIBUTIONS. SALES AN COLLECTIONS, LOANS, AND TRANSFERS

NCPAC	ME	PART NO	1. LINE NO.	144.
DATE	NAME. MAILING ADDRESS. AND ZIP CODE	DCCUPATION AND BUSINESS ADDRESS	AGGR. RECE	
C7/18/80	APT KAAZ 1100 SOUTH BROADWAY LEAVENWORTH, KS 66048	BOX 207	250.00	<b>250.</b> (.)
⊃7/03/8C	J. WESLEY ST. CLAIR SOUTHGATE BANK & TRUST CO. 7600 STATE LINE PRAIRIE VILLAGE. KS 66208		1000.00	10002
7/15/80 e	ALTON OCHSNER 3525 NORTH CAUSEWAY BLVD.,#601 METAIRIE, LA 70002	INFORMATION PRQUESTED. BUT NOT PECLIVED EROM CONTRIBUTOR	1000.00	1000.
7718/80 F	D MP. WILLIAM ROBERTS 1240 SOUTH HAMPTON DRIVE ALEXANDRIA. LA 71301		500.00	500.0

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#### PFRIOD 07/01/80 - 07/31/80

ITEMIZED RECEIPTS--CONTRIBUTIONS, SALES AND COLLECTIONS, LOANS, AND TRANSFERS

MF	PART NO.	1. LINE NO.	144.
NAME. MATLING ADDRESS. AND ZIP CODE	OCCUPATION AND BUSINESS ADDRESS		
MP. ROY GUFFEY 1116 DNE ENERGY SQUAPE 4925 GREENVILLE AVENUE DALLAS. TX 75206	DIL PRODUCER POY GUFFEY DIL COMPANY	250.00	250.
MRS. PAGE NELSON 3318 SOUTHWESTERN BOULEVARD DALLAS. TX 75225	RETIRED NONE	525.00	500.7 25.0
MP. & MRS. HAPRY LEWIS 1104 AZALEA DRIVE LONGVIEW. TX 75601	PRESIDENT L. C G. DIL COMPANY LONGVIEW, TX 7,5601	240.00	0.08 0.08 0.08
MRS. L. J. WHITMEYER, JR. POUTE 1> BOX 110 COLMESNEIL, TX 75938	HOUSEWIFE SAME COLMESNEIL. TX	540.00	25.0 15.( 500.(
D. H. REAUGH 304 NORTH HARDING BRECKENRIDGE. TX 76024	PETROLEUM CONSULTANT PETROLEUM CORP. OF TEXAS BRECKENRIDGE. TX	500.00	500.(
CYRUS K. PICKEL 2801 F.W.N. BANK BUILDING FORT WORTH, TX 76102	PANCHER SELF-EMPLOYED	1000.00	1000.0
	NAME. MAILING ADDRESS.  AND ZIP CODE  MP. ROY GUFFEY  116 ONE ENERGY SOUARE 4925 GREENVILLE AVENUE DALLAS. TX 75206  MRS. PAGE NELSON 3318 SOUTHWESTERN BOULEVARD DALLAS. TX 75225  MP. & MRS. HAPRY LEWIS 1104 AZALEA OPIVE LONGVIEW. TX 75601  MRS. L. J. WHITMEYER, JR. POUTE 1. BOX 110 COLMESNEIL, TX 75938  O. H. REAUGH 304 NORTH HARDING BRECKENRIDGE, TX 76024  CYRUS K. PICKEL 2801 F.W.N. BANK BUILDING	NAME, MATLING ADDRESS, AND ZIP CODE BUSINESS ADDRESS  MP. ROY GUFFFY 1116 DNE THERGY SOUAPE 4925 GREENVILLE AVENUE DALLAS, TX 75206  MRS. PAGE NELSON 3318 SOUTHWESTERN BOULEVARD DOLLAS, TX 75225  MP. & MRS. HAPRY LEWIS 1104 AZALEA DRIVE LONGVIEW, TX 75601  MRS. L. J. WHITMEYER, JR. POUTE 1, BOX 110 COLMESNEIL, TX 75938  D. H. REAUGH 304 NORTH HARDING BRECKENRIDGE, TX 76024  CYRUS K. PICKEL 2801 F.W.N. BANK BUILDING  DIL PRODUCER POY GUFFEY DIL COMPANY POY GUFFEY DIL COMPANY LONGVIEW, TX 75206  DIL PRODUCER POY GUFFEY DIL COMPANY POY GUFFEY DIL COMPANY LONGVIEW, TX 75206  DIL PRODUCER POY GUFFEY DIL COMPANY PRESIDENT L. C G. OIL COMPANY LONGVIEW, TX 75601  HOUSEWIFE SAME COLMESNEIL, TX PANCHER SELF-EMPLOYED	NAME, MATLING ADDRESS, OCCUPATION AND AGGR. RECE AND ZIP CODE BUSINESS ADDRESS YTD. THIS  MP. ROY GUEFFY OIL PRODUCER POY GUFFEY OIL COMPANY  4925 GREENVILLE AVENUE DALLAS, TX 75206 Z50.00  MRS. PAGE NELSON RETIRED NONE  3318 SOUTHWESTERN BOULEVARD NONE  DALLAS, TX 75225 S25.00  MP. & MRS. HAPRY LEWIS PRESIDENT L. & G. OIL COMPANY LONGVIEW, TX 75601  MRS. L. J. WHITMEYER, JR. HOUSEWIFE SAME COLMESNEIL, TX 75938 COLMESNEIL, TX 540.00  MRS. L. J. WHITMEYER, JR. PETROLEUM CONSULTANT PETROLEUM CORP. OF TEXAS BRECKENRIDGE, TX 76024  CYRUS K. PICKEL PANCHER  2801 F.H.N. BANK BUILDING SELF-EMPLOYED

TOTAL THIS PERIOD (LAST PAGE OF THIS PART ONLY)

#### PERIOD 07/01/80 - 07/31/80

ITEMIZED RECEIPTS--CONTRIBUTIONS, SALES AND COLLECTIONS, LOANS, AND TRANSFERS

1000	NCPAC	wF	PART NO.	1. LINE NO.	144.
SCHOOL SECTION	DATE	NAME, MAILING ADDRESS, AND ZIP CODE	OCCUPATION AND BUSINESS ADDRESS	AGGR. RECE	
" "	7/31/80	CP. W. S. LORIMER, JR. 1937 KENSINGTON DRIVE FORT WORTH, TX 76110	PHYSICIAN INFORMATION REQUESTED, BUT NOT RECEIVED FROM CONTRIBUTOR	250.00	250.0
	37/11/89	HOWARD L. TERRY 600 JEFFERSON, SUITE 1600 HOUSTON, TX 77002	INFORMATION REQUESTED. BUT NOT PECEIVED FROM CONTRIBUTOR	500.00	500.C
100	2	M. T. JUND 4550 POST DAK PL. DR., STE.350 HOUSTON, TX 77027	INFORMATION REQUESTED. BUT NOT RECEIVED FROM CONTRIBUTOR	250.00	250.0
and the same of th		APTHUR E. W. BARRETT, JR. 1602 TRANSCO TOWER HOUSTON, TX 77056	OIL PRODUCEP. INFORMATION REQUESTED. BUT NOT RECEIVED FROM CONTRIBUTOR	500.00	<b>500.</b> 0
SCHOOL HOUSE	17/15/80	C. L. BENGE P.O. BOX 39038 HOUSTON, TX 77088	ACCOUNTANT TREES. INCORPORATED	400.00	400.0
	7714/80	MPS. JACK FROST 1802 NATL. BANK OF COMM. BLDG. SAN ANTONIO. TX 78205	INFOPMATION REQUESTED. BUT NOT RECEIVED FROM CONTRIBUTOR	250.00	250.0
	7/23/80	MRS. GEORGE B. MUEEPER 430 EAST POSEWOOD TX 78212	HOUSEWIFE SAME SAN ANTONIO. TX	800.00	800.0°
	07/14/80	O JOHN B. ARMSTRONG P.O. BOX 193 KINGSVILLE, TX 78363	RANCHER INFORMATION REQUESTED. BUT NOT RECEIVED FROM CONTRIBUTOR	2000.00	2000.0
the state of the state of	37/01/8	0 MR. DOUGLAS L. CONE PO BOX 6217 LUBBOCK, TX 79413	PHYSICIAN SELF-EMPLOYED	500.00	500.0
	1				

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#### PER100 07/01/80 - 07/31/80

TTENTITED RECEIPTS--CONTRIBUTIONS, SALES AND COLLECTIONS, LOANS, AND TRANSFERS

NCPAC	Ac.	PART NO. 1	. LINE NO.	144.
DATE	NAME. MAILING ADDRESS.  SOO SID CODE	OCCUPATION AND BUSINESS ADDRESS	AGGR. RECEI	PFRI
	No. J. A. STEWART FOUTE 3 NAMPA, TO 83651	INFORMATION REQUESTED. BUT NOT PECEIVED FROM CONTRIBUTOR	250.00	250.
07/07/90	ROBERT S. BOHRER 2801 STADLINGTON BOISE. TO 83706	BUSINESS EXECUTIVE INFORMATION REQUESTED. BUT NOT RECEIVED FROM CONTRIBUTOR	500.00	500.
07/07/80 <b>6</b>	MR. J. K. WHEELER 330 WEST 21ST STREET SALT LAKE CITY. UT 84115	RANCHER 330 WEST 21ST SOUTH STREET SALT LAKE CITY. UT 84115	500.00	500.1
) <b>15</b> 22/80	MP. DOUGLAS SIMONSON  8711 EAST - INNACLE PARK ROAD SCOTTSDALE: AZ 85255	SALESMAN SCOTTSDALE. AZ	250.00	250.
07711/80 01/14/80 -	ELSA W. MAPK 4935 FAST JULIA STREFT TUCSON, 42 85716	INFOPMATION PEQUESTED. BUT NOT RECEIVED FROM CONTRIBUTOR	350.00	250.( 100.0
27/07/80 27/21/80 €	LEDNAPD W. HARDY 3309 EAST. HIGHWAY 66 KINGMAN. AZ 86401	SELF EMPLOYED 3809 EAST, HIGHWAY 66 KINGMAN, AZ	550.00	200.0 350.0
07/21/80	ROY B. THOMPSON PO DRAWER, SOUTH SLNTA FE, NY 87501	RANCHER PO DRAWER, SOUTH SANTA FE, NM 87501	500.00	500.0
07/31/80	S. R. LAPERRUQUE, SR.  818 SOUTH RIMPAU BOULEVARD LOS ANGELES, CA 90005	SWAMPOCK SERVICES INCOPOR LOS ANGELES. CA	NOITA	500.0
07/01/8	N ROBERT JAMES LIKES SUITE 202 15130 VENTURA BOULEVARD SHERMAN DAKS. CA 91403	INFORMATION REQUESTED. BUT NOT RECEIVED FROM CONTRIBUTOR	250.00	<b>2</b> 50.0
		TOTAL THIS PE		

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#### PERIOD 07/01/80 - 07/31/80

ITEMIZED RECEIPTS--CONTRIBUTIONS, SALES AND COLLECTIONS, LOANS, AND TRANSFERS

NCPAC	, ME	PART NO.	1. LINE NO.	144.
DATE	NAME, MAILING ADDRESS, AND ZIP CODE	OCCUPATION AND BUSINESS ADDRESS	AGGR. RECE	
07/31/80	MP. P. A. AXLINE POX 1874 RANCHO SANTA FS. CA 92067	RETIRED BACA	250.00	250.0
07/15/80	PEX SCRIPPS CLARK 7460 HERSCHEL AVENUE SAN YSIDRO, CA 92073	RETIPED NONE	300.00	300.0
	H. JAMES HOPKINS 14265 TYLER POAD VALLEY CENTER, CA 92082	FARMER NONE	350.00	350.(
•	ANMA CAMPSELL P.D. BOX 70 WARNER SPRINGS. CA 92086	RETIRED NONE	500.00	500.0
07/17/80	GRACE V. NAYERR B96-B RANDA SEVILLA LAGUNA HILLS. CA 92653	RETIRED NONS	250.00	100.0 100.0 50.€
07/29/80	) MR. & MRS. FRANK KELLER 433 CALIFOPHIA STREET SAN FRANCISCO, CA 94104	RETIRED NONE	300.00	300.0
_	D MR. DAVID D. BOHANNON 60 HILLSDALF MALL SAN MATED. CA 94403	BUSINESS EXECUTIVE INFORMATION REQUESTED. BUT NOT RECEIVED FROM CONTRIBUTOR	500.00	500.0
07/17/80	D BAY AREA CONCRETES, INC. C/O JAMES C. SYNDER PO BOX 1728 FREMONT, CA 94538	PRESIDENT FREMONT, CA	250.00	250.0
07/15/8	O MP. & MRS. HERMAN TIJSSELING 665-LANCASTER ROAD HALNUT CREEK, CA 94595	665 LANCASTER ROAD	250.00	250.0
07/15/8	O DON R. SCHLETCHEP 10 TOWER POINT LANE TIBURDN. CA 94920	INFORMATION REQUESTED. BUT NOT RECEIVED FROM CONTRIBUTOR	. 500.00	500.0
		TOTAL THIS PAGE		

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#### PERIOD 07/01/80 - 07/31/80

TYPHIZED RECEIPTS--CONTRIBUTIONS. SALES AND COLLECTIONS, LOANS, AND TRANSFERS

W( 1.0(	, <del></del>		PART NO. 1. LINE NO. 144.
DATE	MAME. MAILING ADDRESS. AND ZIP CODE	DCTUPATION AND Business address	AGGR. RECEIPT AT. VTD. THIS PERICE
07/24/80	MRS. C. F. DETRACEY 165 BLOSSON HILL ROAD SP24 SAM JOSE. CA 95123	NONE NONE	300.00
07/01/80	PR. 6 MRS. EDWARD A. O'NEILL 3965 NOELA PLACE HONOLULU, HI 96815	HOUSEWIFE SAME HONOLULU. HI	250.00
37/15/80 —	MP. JOHN A. WINTERS 7623 SE SALMONT STREET PORTLAND, DR 97214	RETIRED NONE	250.00

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Last this bear

DATE	1/15/80	ANALYSTMark	Cleinman MK		
TO: Office of Ger	neral Counsel	TEAM CHIEFBobby	Werfel S		
THROUGH: STAFF	DIRECTOR V	COMPLIANCE REVIEW	N PS		
FROM: ASSIST	ANT STAFF DIRECTOR	FOR REPORTS ANALYSIS	TAH .		
			U.	•	
CANDIDATE/COMMITT TREASURER: ADDRESS:		vard, Suite 513	omittee	-	
AFFILIATE(S):	None				
ALLEGATION(S): Failure to report CITE: 2 U.S.C. 434(b)(4)(H)(iii)ATTACHMENT(S) #5 independent expenditures in a timely fashion.  ONTINUED PAGE TO DATE INITIATED: 7-16-79					
MANNER IN WHICH RE  Normal Review  Special Project	w Other:		ATTACHMENT		
REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment 1.					
	Attachment 1.	low have received initial basi	ic review. For all reports	<b>;</b>	
	Attachment 1.	low have received initial basi	7-31-80		
reviewed, see	Attachment 1.		7-31-80		
reviewed, see PERIOD COVERED FRO	Attachment 1.  S-1-79	то	7-31-80 \$3,609,102		
PERIOD COVERED FRO TOTAL RECEIPTS \$	Attachment 1.  S-1-79  3,797,000	TOTAL EXPENDITURES	7-31-80 \$3,609,102		
reviewed, see PERIOD COVERED FRO TOTAL RECEIPTS \$ CASH ON HAND \$	Attachment 1.  S-1-79  3,797,000  228,600  PFAI sent 7-16-79 Response 12-27-79.	TOTAL EXPENDITURES  DEBTS \$ owed to 9  indicates continuance	7-31-80 \$3,609,102		
reviewed, see  PERIOD COVERED FRO  TOTAL RECEIPTS \$  CASH ON HAND \$  HISTORY:  RESULTS OF REVIEW:	Attachment 1.  S-1-79  3,797,000  228,600  RFAI sent 7-16-79 Response 12-27-79. Basic Review 5-27-80	TO TO  TOTAL EXPENDITURES  DEBTS \$ owed to 9  indicates continuance em.	7-31-80  \$ 3,609,102  9556 / owed by 456,059	#2	

OTHER PENDING ACTIONS INITIATED BY RAD:

**ATTACHMENT** 

Failure to accurately unschool	<b>#6</b> ,#11
cash-on-hand. Failure to report independent 2 U.S.C. 434(b)(4)(H)(iii)	<b>#</b> 6
	<b>#6,</b> #12
RESULTS OF REVIEW:  REALS sent 6-3-80  Letter to Commission indicating  committee needs more time to respond 6-25-80	<b>4</b> 6 <b>≠</b> 8
RFALs Second letter sent 7-2-80	#9 #10
Response: 7-30-80  Basic Review shows cash discrepancy has not been resolved.	/10 /11
COTTUNICATIONS WITH CANDIDATE/COTTUTEE:	
Telecon: 6-24-83	<i>.</i> ‡7
OTHER RELEVANT INFORMATION:	
Additional discrepancies, subsequent to April Nonthly 1980, between amount reported paid to reduce debts (on Schedule D) and amounts disclosed	<u>112</u>
on expenditure schedules (Schedule B and Schedule E)	

ATTACHMENT:

MEMORANDUM! TO THE REFERRAL: NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE FROM: MARK KLEINMAN

Under "Other Relevant Information" (Attachment #13), we have listed the problem relating to itemized contributions. It is placed there because it is not referrable under the Review and Audit Policy. We recommend, given the magnitude of the problem, over \$500,000 in previously unitemized contributions, that the Office of General Counsel, make it an allegation.

ATTACHTENT #1

#### NOISETRACO NOITOSOS HANGGET CO-PV) (0) - ETMENDOCO ENDEDDEID PO XEDNI EDITINADO

DATE 103EF80 FAGE 1

#### DON-EARTI BELATER

COMPRESS   LOCATION			HOW-FARTI RELAT			
Internation   American   Internation   American   Internation   American   Internation   American   Internation   American   Internation   American   Internation   American   Internation   American   Internation   American   Internation   American   Internation   Internation   American   Internation   Inter	COMMITTEE			EXPENDITURES	COVERAGE DATES PA	OF MICROFILM
1379   Inferent					1	
AlSERLAMBOUS REFORM   Talement of posadication - Ameriment   11FEP7   TO FEC   2 797EC/120/4738     Talement of posadication - Ameriment   200177   200177   2 797EC/140/314     Talement of posadication - Ameriment   75,229   76,429   11RA79 - 31JAR79   3 797EC/140/314     Talement of the posadication - Ameriment   75,229   76,429   11RA79 - 31JAR79   4 797EC/125/4854     Talement of the posadication - Ameriment   75,227   76,429   11RA79 - 31JAR79   4 797EC/125/4854     Talement of the posadication - Ameriment   75,227   76,429   11RA79 - 31JAR79   2 797EC/143/3036     Talement of the posadication - Ameriment   75,227   76,429   11RA79 - 31JAR79   2 797EC/143/3036     Talement of the posadication - Ameriment   75,227   76,429   11RA79 - 31JAR79   2 797EC/143/3036     Talement of the posadication - Ameriment   7						ID #C0002468/
AlSERLAMBOUS REFORM   Talement of posadication - Ameriment   11FEP7   TO FEC   2 797EC/120/4738     Talement of posadication - Ameriment   200177   200177   2 797EC/140/314     Talement of posadication - Ameriment   75,229   76,429   11RA79 - 31JAR79   3 797EC/140/314     Talement of the posadication - Ameriment   75,229   76,429   11RA79 - 31JAR79   4 797EC/125/4854     Talement of the posadication - Ameriment   75,227   76,429   11RA79 - 31JAR79   4 797EC/125/4854     Talement of the posadication - Ameriment   75,227   76,429   11RA79 - 31JAR79   2 797EC/143/3036     Talement of the posadication - Ameriment   75,227   76,429   11RA79 - 31JAR79   2 797EC/143/3036     Talement of the posadication - Ameriment   75,227   76,429   11RA79 - 31JAR79   2 797EC/143/3036     Talement of the posadication - Ameriment   7	1576	TINTEMERT OF CONTRACTORS - AMENDMEN	. T		555570	3 79FEC/190/1903
TATEMENT OF GO-ANTISATION - AMERIBARIT   1200277   200277   279FEC/140/318   1200277	L 7 , 7		* I		_ · _ <del>_</del> · · ·	
TATEREST OF SANITATION - AREIDHERT   75,229   76,429   11M79 - 311M79   38 79FEC/12/7081			d T			
FEFFORKER MORTHER						
TEREMAN   MORTHER   - AMENDMENT   - AMENDMENT     1JAN79   - 31JAN79   4 797EC/125/4856   12876481   MORTHER   -     -     -				76.479		
FEBSUARY   modifier				737127		
FEBJARN   MODIFILE   - AMERIDARENT   75,029   13AR79 - 31JAR79   7 79FEC/142/0737   FEBJARN   11AR79 - 31JAR79   7 79FEC/142/0737   FEBJARN   11AR79 - 31JAR79   3 79FEC/143/3063   FEDGEST FOG ACCENTRAL INFORMATION   12AR79 - 31JAR79   3 79FEC/12/33363   FEDGEST FOG ACCENTRAL INFORMATION   12AR79 - 31JAR79   3 79FEC/12/33363   FEDGEST FOG ACCENTRAL INFORMATION   12AR79 - 31JAR79   3 79FEC/12/33063   FEDGEST FOG ACCENTRAL INFORMATION   150,391   75,143   FEB79 - 38FEB79   4 79FEC/12/43/0756   FEB79 - 38FEB79   3 79FEC/12/43/0756   FEB79 - 38FEB79   3 79FEC/12/43/0505   FEB79 - 38FEB79   3 79FEC/12/43/0505   FEB79 - 38FEB79   3 79FEC/14/3/0505   FEB79 - 38FEB79   2 79FEC/14/3/0506   FEB79 -38FEB79   2 79FEC/14/3/0506   FEB79				-		
FERBURAN   FOR ALLITIONAL INFORMATION   124779 - 31148779   3 79FEC/143/30635   12600257 FOG ALLITIONAL INFORMATION   124779 - 31148779   3 79FEC/12/3336   12600257 FOG ALLITIONAL INFORMATION 2019   124779 - 3114879   3 79FEC/12/30/336   124779 - 32FEB79   4 79FEC/14/30/336   124779 - 32FEB79   4 79FEC/14/30/336   124779 - 32FEB79   4 79FEC/14/30/336   124779 - 32FEB79   3 79FEC/14/30/336   124779 - 32FEB79   3 79FEC/14/30/336   124779 - 32FEB79   3 79FEC/14/30/336   124779 - 32FEB79   2 79FEC/14/30/336   124779 - 32F				76.429		
REQUEST FOR ALLITIONAL INFORMATION   1JAM79 - 31JAM79   3 79FEC/12//3336   1JAM79 - 31JAM79   3 79FEC/12//3336   1JAM79 - 31JAM79   3 79FEC/13//3306   1JAM79 - 31JAM79   2 79FEC/13//3306   1JAM79 - 31JAM79   2 79FEC/13//330736   1JAM79 - 1JAM79 - 1JAM79 - 1JAM79   2 79FEC/13//330736   1JAM79 - 1JAM79 - 1JAM79 - 1JAM79   2 79FEC/13//330736   1JAM79 - 1JAM79 - 1JAM79 - 1JAM79 - 1JAM79 - 1JAM79 - 1JAM79   1 75,143				-		
			• • •			
### BEDGGST FOR ALLITIONAL IMPORNATION 288						
### ### ##############################			2 H Iv			
MARCH MUNITELL				75,143		
### ARCH MURTHET - AREMOMENT -		HARCH MUNIHL! - AMERDMEN		-		
RACH MONTHLY						
REDUEST FOR ALLITIONAL INFORMATION 2ND   15679   2356ER79   2 79FEC/133/0662   1600EST FOR ALLITIONAL INFORMATION 2ND   71.537   73.007   1MR79   -316R879   2 79FEC/133/0548   1MFEL NOWTHL   1 AMENDMENT				75,143		
1						
### AFFIL mowTher			I N D			
AFRIL MONTHER - AMERIMENT 72,590 73,012 1HAR79 -31HAR79 9 80FEC/147/044 PEODEST FOR ALLITIONAL INFORMATION 1HAR79 -31HAR79 2 79FEC/133/0664 PEODEST FOR ALLITIONAL INFORMATION 2ND 1HAR79 -31HAR79 2 79FEC/143/0732 PART MONTHER 1 123,609 115,691 1AFR79 -31HAR79 2 79FEC/143/0732 PART MONTHER 1 123,609 115,691 1AFR79 -30APR79 2 79FEC/143/0732 PART MONTHER 1 123,678 115,700 1AFR79 -30APR79 2 79FEC/143/0732 PART MONTHER 1 123,678 115,700 1AFR79 -30APR79 2 79FEC/143/0732 PART MONTHER 1 123,678 115,700 1AFR79 -30APR79 1 79FEC/143/1044 PEODEST FOR ADDITIONAL INFORMATION 162,111 15,410 1HA779 -31HA779 1 79FEC/143/1044 PEODEST FOR ADDITIONAL INFORMATION 162,111 145,445 1HA779 -31HA779 3 79FEC/140/4201 PART MONTHER 1 1,79,610 15,482 1JUL79 -31HA779 1 80FEC/149/1047 PEODEST MONTHER 1 1,79,610 15,482 1JUL79 -30JUN79 58 79FEC/140/1047 PEODEST MONTHER 1 1,79,610 174,125 1JUL79 -30JUN79 58 79FEC/140/1047 PEODEST MONTHER 1 1,79,610 174,125 1JUL79 -31JUL79 47 99FEC/135/1408 PEODEST MONTHER 1 1,79,610 174,125 1JUL79 -31JUL79 48 OPEC/149/135/1408 PEODEST MONTHER 1 1,79,610 174,125 1JUL79 -31JUL79 47 99FEC/135/1408 PEODEST MONTHER 1 1,79,610 174,125 1JUL79 -31JUL79 47 99FEC/135/1408 PEODEST MONTHER 1 1,79,610 174,125 1JUL79 -31JUL79 48 OPEC/145/1408 PEODEST MONTHER 1 1,79,610 174,125 1JUL79 -31JUL79 49 99FEC/135/1408 PEODEST MONTHER 1 1,79,610 174,125 1JUL79 -31JUL79 49 99FEC/135/1408 PEODEST MONTHER 1 1,79,610 174,125 1JUL79 -31JUL79 49 99FEC/135/1408 PEODEST MONTHER 1 1,79,610 174,125 1JUL79 -31JUL79 49 99FEC/135/1408 PEODEST MONTHER 1 1,79,610 174,125 1JUL79 -31JUL79 49 99FEC/135/1408 PEODEST MONTHER 1 1,79,610 174,125 1JUL79 -31JUL79 49 99FEC/135/1408 PEODEST MONTHER 1 1,79,610 174,125 1JUL79 -31JUL79 49 99FEC/135/1408 PEODEST MONTHER 1 1,79,610 174,125 1JUL79 -31JUL79 49 99FEC/135/1408 PEODEST MONTHER 1 1,79,610 174,125 1JUL79 -31JUL79 49 99FEC/135/1408 PEODEST MONTHER 1 1,79,610 174,125 1JUL79 -31JUL79 49 99FEC/135/1408 PEODEST MONTHER 1 1,79,610 174,125 1JUL79 -31JUL79 49 99FEC/135/1408 PEODEST MONTHER 1 1,79,610 174,125 1JUL7		AFRIL MONTHLY	71,537	73,607		40 79FEC/125/4810
PEGUSST FOR ABLITIONAL INFORMATION		HEFTL MONTHLY - AMENDMEN	41 -	-	1MAR79 -31MAR79	4 79FEC/143/3048
REGUSST FOR ABBITIONAL INFORMATION		AFRIL MONTHLY - AMENDME	NT 72+590	73,012	1MAR79 -31MAR79	9 80FEC/149/0444
1820EST FOR ABBITIONAL INFORMATION 2ND   132,809   115,691   14779 -306FR79   49 79FEC/143/0732   49 79FEC/127/487   177   187   1		REQUEST FOR ALLETIONAL INFORMATION			18A879 -318A879	2 79FEC/133/0664
### ### #### #### ####################		PEGUEST FOR ALBITIONAL INFORMATION			18AR79 -31HAR79	2 79FEC/140/1044
### ##################################		LEQUEST FOR ADDITIONAL INFORMATION 3	2MD		18AR79 -31HAR79	2 79FEC/143/0732
### ##################################		mai monthli	122,509	115,691	1AFR79 -30AFR79	49 79FEC/127/4672
MAY MONTHLIT		HAY MORTHLY - AMENDMEN	vī -	-		
REQUEST FOR ADDITIONAL INFORMATION   182,111   195,410   114779 -3146779   1 79FEC/140/1046				115,700		
182,111						
1000 modified		JUNE MONTHLY	182,111	1:5.410		1 79FEC/129/1634
JUNE HONTHULL				_		
184779 -31MAY79   3 79FEC/140/1047   3 79FEC/140/1047   3 79FEC/140/1047   3 79FEC/140/1047   3 79FEC/140/1047   3 79FEC/133/3803   3 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0				145.448		18 80FEC/149/1809
3001 mowth:   1/9,810   105,482   1JUN79 -30JUN79   58 79FEC/133/3803   1JUN79 -30JUN79   25 80FEC/149/4347   120005 mowth:   - Amendment   179,810   174,274   1JUN79 -30JUN79   25 80FEC/149/4347   120005 mowth:   - Amendment   - 1JUN79 -31JUN79 -31JUN79 -31JUN79 -31JUN79 -31JUN79 -31JUN79 -31JUN79   49 79FEC/135/1498   1JUN79 -31JUN79   49 79				1.37.11		
DOLY RONTHL!			1/9.510	105.482		
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#### HUN-FARTY RELATED

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	OCTOBER MONTHLE	- AMENDMENT	253,854	238,005		303EF77		80FEC/163/4524
	WEMBER MONTHLE		200,910	312,781		-310LT79		79FEC/141/4216
	HOTEMBER MONTHER	- AMERIAMERT	254,543	308,588		-310CT79		30FEC/163/4623
	REQUEST FOR ADDITIONAL :	INFORMATION				-310CT79		80FEC/157/2445
	DECEMBER MUNIFICA		209,403	304,173		-3640479		79FEC/143/1812
	DECEMBER MUTTHET	- AMENIMENT	139,483	304,123		-3085979		30FEC/163/4774
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	ALGORAL TOWARD TERMENT					-3070779		80FEE/157/2447
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	JUNE MONTHLY	- AMENDMENT	377,655	379,677	1 MAY 80	-31MAY80	18	80FEC/164/2205
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ATTACHMENT #2

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# FEDERAL ELECTION COMMESSION IMMINISTRA DE BIM

Becti A. Cocil, Treasurer Betiens: Conservative Political Action Committee 1803 Milson Boulevard, Suite 813 Arlington, VA 82209

Page No. Cocil:

This letter is prompted by our interest in assisting committees who wish to comply with the Federal Election Commaign Act.
February Monthly, March Monthly &

During review of the <u>April Monthly</u> Report of Receipts and Expenditures, we noted that you omitted certain information or made apparent mathematical errors in certain entries. Actached is an itemization of the information requested.

While we recognize the difficulties you may have experienced in filling out the reporting forms, we must ask that you supply the Commission with the missing information within fifteen (15) days from the date of this letter. If you have any questions, please do not hesitate to contact <a href="Hark Kleinman">Hark Kleinman</a> in our Reports Analysis Division on the toll free number (200)424-9530. Our local number is (202)357-0026.

Sincerely, B. Porter

Orlando B. Potter Staff Director

Attachment FEC Form 12

#### PEDERAL ELI TITATA (C. 1990): 1215 K. Street, N. W. Wathington, D.C. 2043

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Your initial submission(s), together with this request for additional information, has been made available for public inspection. The Commission urges you to file the additional submission(s) promptly to the above address. If you have any questions regarding this request, please call the Reports Analysis Division toll free at (800) 424-9530. The local Washington, D.C. telephone numbers are (202) 523-4048 (Senate, Non-Party), 523-4172 (House) or 523-1474 (Party).

Senzte 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.

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BATHOMAL CONCERNATIVE POLITICAL ACTION CONSITTEE BETWEET FEB ACOUTIONAL ENFORMATION PAGE FINE

#### All Brooms

Please clarify the circumstances of the in-kind contributions reported on Schodule B. Line 22c and the independent expenditures reported on Schodule E. Line 23. disclosed after the 1978 General Election.

Please be advised that in-kind contributions and independent expanditures should be reported on Schedule B. Line 22c, and Schedule E. Line 23, respectively, at the time that these expanditures were made on behalf of or against candidate(s). If these expanditures were also debts could be reported as a memo entry only on Line 22c and Line 23 respectively, of the Detailed Summary Page, in addition to being disclosed on Schedule C. Line 13.

Please be advised that the subsequent payments to extinguish these debts should be reported on Line 20a of the Detailed Summary Page and Schedule B and C accordingly.

Please amend your reports accordingly.

#### March Monthly

Please clarify the entry on Schedule A, Line 18a from MediAmerica for "Ment, peroxing and telephone cost" on 2-1-79 for \$1621.

#### Murch and April Monthly Reports

Your reports disclose loan repayments to <u>First American Bank of Yirginia</u> on Schedule B, Line 21a. The <u>Year End and February Monthly Reports</u>, filed by your committee, which reported the receipts of the loans, disclosed endorsers or guarantors of the loans along with the amount of the loans each guarantor was guaranteeing. As the principals are reduced by repayments to <u>First American Bank of Virginia</u>, so must the amounts guaranteed by each guarantor. Please amend your reports to supply this information.

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STEMIZED EXPENDITURES

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### STEMIZED INDUFERDENT EXPENDITURES FOR LINE 23, FEC FORM 3

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Wational Conservative Political Action Committee C00024687								
Tell Reprise Address and 21P Code It this a Separate Report by a Commission								
Mational Conservative Pol 1500 Wilson Blvd., Suite Arlington, VA 22209	· <del>=====</del>							
Execute independent expanditures which present in a Figh Teams, Marrier Address & 25° Code	No appropria. \$100 without a calend	Dan trand.						
of last Payer	Esperature	day, year)	Amount	Name of Federal Cardidate temperated or appoint by the expendence & office couples				
MediAmerica, Inc. 5306 Risenhover Ave. Alexandria, VA 22304	Ad Production Expense			Senator McGovern South Dakota				
	:	3-6-79	\$1,190.28	E Sesson - B Crosso				
Sadiamerica, Inc.	Ad Production Expense	3-7-79	·	Senator McGovern South Dakota				
Namerican Mailing Lists 7777 Leesburg Pike Falls Church, VA 22043	List Mental Expense	3-29-79	\$ 742.68	Williams - Senate MT				
Corp.	List Mental Expense	3-29-79	<b>\$</b> 511.43	Sonny Kane PA-7				
Mediamerica, Inc.	Production Services	3-29-79	\$2,190.82	Sonny Kane PA-7				
fal BURTOTAL of Itemized Independent Expendent Biguret Burgondent Expendent Expendent Expendent Expendentes	Souris	••••••	•	s_4,705.21				

Under panelty of perjury I cortify that the independ Bersin were not made in cooperation, consultation, concert with, or at the PROCESSE OF SUPPLISSION OF SMY CONSIDERS OF SMY SUCTIONIZED COMMISSION OF SE of such candidate or authorized committee. Furthermore, # did not involve the financine of dissemiration, distribution, or me do whole or in part of any compaign superish proposed by the space on committee, or glair agent.

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ATTACHMENT #3

TELECON TO THE FILE: NATIONAL CONSERVATIVE POLITICAL ACTION CONTITTEE

FROM: MARK KLEIN ALL

DATE: 8-7-79

RE: RFAIs M2,1B and 14.

I spoke with Becki Cecil, 522-2800, Treasurer. She stated that she was trying to file Audit amendments too. She will respond as soon as possible.

Becki Cecil, Treasurer 522-2800

ATTACHMENT #4

## National Conservative Political Action Committee

1600 wilson blvd. suite 513 arlington, va. 22209 (703) 522-2200

'79 DEC 28 AN 11: 88

December 27, 1979

Pederal Election Commission 1325 E St. W/ Washington, DC 20463

Dear Sire:

I am writing in response to your letter of July 16 which contained several inquiries concerning items on the Mational Conservative Political Action Counittee's (MCPAC's) February Monthly, March Monthly, and April Monthly Reports. I have done by best to answer these questions below:

#### All Reports -

On these reports, all expenditures which were allocated to candidates either as in kind or independent expenditures were reported to the commission as soon as the actual check to cover the expenditure was written. If the expenditure qualified to be listed on the debt schedule it was listed there in previous reports, and removed as specified when paid. I have never been instructed otherwise until now, and have continually tried to the best of my ability to comply with all provisions of the Federal Election Campaign Act. I will, however, keep your recommendations in mind to avoid future occurrences of this type.

#### March Monthly 1979 -

The losm repayment made on Schedule B line 21s was a payment on the losm which was endorsed by John T. Dolan on 12/14/78 and was reduced correctly on Schedule C line 13 page 10 of 15 (pages attached). I understand how it could have been misunderstood and will try to be more specific in the future concerning such things.

The entry on Schedule A line 18s dated 2/1/79 from Mediamerica was for a repayment to MCPAC for rent, xeroxing, and telephone costs which were incurred on behalf of Mediamerica when they were in the position of sub-tenants to MCPAC.

#### April Monthly 1979 -

The two loan repayments made on Schedule B line 21s were for two different loans, though not clearly marked as such. The first was the final balance due on the \$5,000.00 loan endorsed by John T. Dolan on 12/14/78, and was shown as such on Schedule C, Line 13 page 9 of 15. (pages attached) The second payment was the first installment on the large loan taken

ATTACHMENT #5

The reporting problem is continuing, despite the Treasurer's assurance, that it would not occur again. It should be noted, that for purpose of analysis, the reports after the response of 12-27-79 were examined. The problem continues, primarily with the independent expenditures and not the in-kind contributions, as the committee does not incur debts for the in-kind contributions that have been reported.

The attached chart illustrates the committee's debt reporting problem, on their most recent reports.

For any given report, for example the Year End, the amount of outstanding debt that has been reduced, to a creditor/vendor during that reporting period, as shown on a debt schedule (Schedule C), should be less than or equal to the payments made to that creditor/vendor under operating expenditures (Schedule B). However, the chart indicates that the amount of debt that is being reduced, per report, is greater than the payments shown as operating expenditures on Schedule B. This would seem to indicate that the committee is dropping the difference because no comparable payments are being disclosed.

However, if the payments being made to a respective creditor/vendor, during a reporting period, allocated as both operating expenditures (Schedule B) and independent expenditures (Schedule E) are added together, then the amount of debt that has been reduced is generally less than or equal to the total payments (the last column of the chart), to a respective creditor/vendor.

This would seem to indicate that the payments on Schedule E, as reported by the committee, were for previous debts, and thus should have been disclosed at the time contracts were written, rather than when payments were made to extinguish debts.

Thus, the reporting problem from before, as described in the committee's response of 12-27-79 (Attachment 44) is probably continuing. Or else, the committee is reporting correctly and dropping a lot of debt (over \$30,000 as shown by the chart).

3 | 3 | 3 | 3 | 3 | 3 | 7 | 3

Vendor	•	Debt Reduction to on Schedule C	Payments made to on Schedule B		Payments made to on Schedule E		Total Payments	
Diversified Mailing	Year-Fnd(12-1 to 12-31-79	•	(9047	+	5390)	=	14437*	
Services	February(1-1 to 1-31-80)	4450	(1351	+	3055)	=	4436	
	March(2-1 to 2-29-80)	22454	(11459	+	3540)	=	19999*	
Diversified Printing	Year-End(12-1 to 12-31-79	9762	(6494	+	4345)	=	11339	
Services	February (1-1 to 1-31-80)	1153	(1)	+	1155)	=	1155	
	March(2-1 to 2-29-39)	4304	(2372	+	4225)	=	7097	
Richard A. Viguerie	Year-End(12-1 to 12-31-79	38690	(25916	+	12766)	=	386°?	
	February (1-1 to 1-31-00)	13066	(14157	+	3715)	=	17	
	March(2-1 to 2-29-30)	63790	(52470	+	11315)	=	63.55	
Prep, Inc.	Year-Fnd(12-1 to 12-31-79	22639	(9233	+	13450)	-	22633	
110, 110	February (1-1 to 1-31-80)	5444	(492	+	4952)	=	5/,44	
	March(2-1 to 2-29-80)	18334	(11505	+	11999)	=	23/49/4	
Totals		2256831	(1/4996	+	84907)	=	2299032	

1Note: The Difference Between Debt Reduction to and Payments made to on Schedule B or 80722 is equal to the amount of debt which the committee has dropped, if they are currently reporting correctly.

<sup>2</sup>Note: The Difference Between Debt Reduction to and Total Payments which include the Payments made to on Schedule E is +4215.

\*Denotes Total Payments less than Debt Reduction including Payments made to on Schedule E, or apparent amount of debt dropped.

ATTACHMENT 45

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#### FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

JUN 3 1980

Susan S. Hannegan, Treasurer National Conservative Political Action Committee 1500 Wilson Blvd. Suite 513 Arlington, VA 22209

Identification No: C00024687

Reference: September Monthly Report (8-1-79 to 8-31-79)

Dear Ms. Hannegan:

This letter is prompted by the Commission's preliminary review of your September Monthly Report. The review raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act. An itemization of these areas follows:

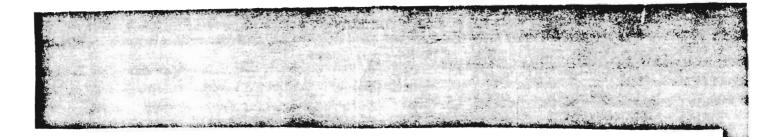
- The ending cash balance of one report should be exactly the same as the beginning cash balance of the next. The August Monthly Amendment shows an ending balance of \$57,255 (Line 10) Column B, while the September Monthly report shows a beginning balance of \$40,712 (Line 7) Column A.

An amendment to your original report correcting the above problems should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,

Mark Kleinman Reports Analyst

Reports Analysis Division



FEC FORM J REVISED January, 1978 Federal Election & monoscon 1325 K Street, IVW Washington, D.C. 204n3

## REPORT OF RECEIPTS AND EXPENDITURES FOR A CANDIDATE OR COMMETTE SUPPORTING CANDIDATE (S) FOR NOMINATION OR ELECTION TO FEDERAL OFFICE

(Lacept for Candidates or Committees Receiving Federal Matching Funds)

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Note: Committees outhorized by a confidate separate records with respect to each	te to receive Contributions and in ike ex Liection	pea-fetares n	a come chan with many	on a new alections as sail or a con-
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, National Constitute			
Name of Candidate or Committee in tuni 1500 Wilson BlvJ. #51			date/Committee
Address instruction and street: Arlington, VA 22209		Office Sought, State/District Sit	applicable)
City, State and ZIP Code	Check if address is different then	previously reported.	Year of Election
4 Type of Report Scheck appropriate bases)			
April 10 Quarterly Report	Tenth day report preceding(primary, general	or convention)	3 Termination Report
July 10 Quarterly Report	en in the State of		Amendment for:
October 10 Questorly Report	(date)  Thirtieth day report following	election	
C January 31 Annual Report September (menth)	on in the State of	rai or convention)	
This is a report for Primary Elec	SUMMARY OF RECEIPTS AND E	XPENDITURES	her lapacies, numerit, esc.)
	(Figures may be rounded to new		<u></u>
S Covering Period 8/1/79 Thro	8/31/79	Column A This Period	Caluma B Calendar Year To-Data
6 Cest (in hand January 1, 19			10,490.01
7 Cash on hand at beginning of reporting per	riod	s 40,712.10	
8 Total receipts (from line 19)	• • • • • • • • • • • • • • • • • • • •		* 1,153,471.88
(a) Subtotal (Add lines 7 and 8 for Column	n A and lines 6 and 8 for Column B)	\$ 257,404.37	1,163,961.89
9 Total expenditures (from line 25)	· · · · · · · · · · · · · · · · · · ·	186,128.19	1,092,685.71
10 Cash on hand at close of reporting period	(Subtract line 9 from line 8a)	\$ 71,276.18	\$ 71,276.18
11 Value of contributed items on hand to be (Attach itemized list)	•	_	
12 Debts and obligations owed to the Commi	ittee/Candidate (itemize all on Schedule C)		
13 Debts and obligations owed by the Comm	ittee/Candidate (itemize all on Schedule C)	330,815.02	

13 Debts and obligations owed by the Committee/Candidate (itemize all on Schedule C)

or Section 441; (see reverse side of form).

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

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

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

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

(Signature of Tressurer or Candidges)



#### FEDERAL ELECTION COMMISSION

WASHINGTON, DC 20463

JUN 3 1980

Susan S. Hannegan, Treasurer National Conservative Political Action Committee 1500 Wilson Blvd. Suite 513 Arlington, VA 22209

Identification No: C00024687

Reference: November Monthly Report (10-1-79 to 10-31-79)

Dear Ms. Hannegan:

This letter is prompted by the Commission's preliminary review of your November Monthly Report. The review raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act. An itemization of these areas follows:

- Your committee has made loans to <u>Jed Richardson For Congress</u> and <u>Friends of Denny Smith</u> on the expenditure schedule (Schedule B). When there are loans made by a committee, they should also be reflected on the debt schedule (Schedule C).

An amendment to your original report correcting the above problems should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,

Mark Kleinman

Reports Analyst

Reports Analysis Division

REVISION DE REVISION 1978

Federal Election Commission 1325 2. Street, N.W.

Washington, D.C. 20463

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Name of Candidate or Committee in Full National Conservative Political Action Committee Particulars of Expanditure Full Name, Mailing Address and ZIP Code Amount of each est Deta (month, Diversified Mail Manuting, Isc. Postage Loan the the law or day, year) Postage escrow Acct. for 10/10/79 4.000.00 Jed Richardson Vt-1 Jed Richardson for Congress Expenditure for: Debt P.O. Box 1059, Provo, VT4601 Ag. yr to date-(4,000.0 C Other Primary General Full Name, Mailing Address and ZIP Code Amount of each experie Particulars of Expenditure Dese tmonth, day, year! turn the period Friends of Denny Smith Postage Loan 3285 Balsam Dr. So. Denny Smith OR-2 10/10/79 3,400.00 Salem, OR 97302 Expenditure for: Ag. yr. to date-(3,400.0 Frimary General D Other Particulars of Expenditure Full Name, Marking Address and ZIP Code Dete (month, Amount of each expense day, year) tern the period Expenditure for: Ag. yr. to date-( ☐ Primary ☐ General Other Full Name, Mailing Address and ZIP Code Particulars of Expenditure Date (month, Amount of each expend ture that per-ed day, year) Expenditure for: Ag. yr. to date-( Primare General Other Amount of each expend-Full Name, Meiling Address and ZIP Code Particulars of Expenditure Dete (month, dey, year) ture this period Expenditure for Ag. yr. to date-( Primare General Other Full Name, Mailing Address and ZIP Code Particulars of Expenditure Date (month, Amount of each expend day, year) ture this puriod Expenditure for: Ag. yr. to date-( Primary General Other Dete Imonth. Amount of each each Full Name, Mailing Address and ZIP Code Particulars of Expenditure ture this period day, year) Expenditure for: Ag, yr, to date-( Primary General Other Dete (month, Amount of each expand Particulars of Expenditure Full Name, Mailing Address and ZIP Code dey, year! ture this period

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#### FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

3 1980

Susan S. Hannegan, Treasurer National Conservative Political Action Committee 1500 Wilson Blvd. Suite 513 Arlington, VA 22209

Identification No: C00024687

Reference: December Monthly Report (11-1-79 to 11-30-79)

Dear Ms. Hannegan:

This letter is prompted by the Commission's preliminary review of your December Monthly Report. The review raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act. An itemization of these areas follows:

- Please clarify the entry on Schedule E, Line 23 to <u>Target '80</u> 11-21-79 \$2,200 for "Postage Expense". If this was a transfer to another political committee, then please so state and indicate whether this should be shown on Schedule B, Line 22.

In addition, please provide your relationship with Target '80, if any.

An amendment to your original report correcting the above problems should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,

Mark Kleinman Reports Analyst

Reports Analysis Division

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#### FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

#UN 8 1980

Susan S. Hannegan, Treasurer National Conservative Political Action Committee 1500 Wilson Blvd. Suite 513 Arlington, VA 22209

Identification No: C00024687

Reference: Year End Report (12-1-79 to 12-31-79)

Dear Ms. Hannegan:

This letter is prompted by the Commission's preliminary review of your Year End Report. The review raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act. An itemization of these areas follows:

- Please clarify the entry on Schedule E, Line 23 to <u>Donna Le</u>
<u>Porte, Anyone But Culver</u> 12-27-79 \$1,773 for "Postage and
Freight Charges". If this was a transfer to another political
committee, then please so state and indicate whether this
entry should be shown on Schedule B, Line 22.

In addition, please state your relationship with Anyone But Culver, if any.

- Your committee has made loans to <u>Don Lyon For Congress</u> and <u>Citizen's Advocate PAC</u>. When there are loans made by a committee, they should also be reflected on the debt schedule (Schedule C).

An amendment to your original report correcting the above problems should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,

Mark Kleinman Reports Analyst

Reports Analysis Division

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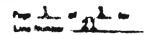
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SCHEDULE B REVISED January, 1978 Federal Election Commission 1325 K Birset, N.W. Washington, D.C. 20463 0

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#### ITEMIZED EXPENDITURES

Reporting Transfers Out, Contributions in Kind, Leans, Lean Repsyments and Returns Model Supporting Lines 20s, 21s, and 22s, 27b, and 22c of FEC FORM 3



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Name of Candidate or Committee in Full National Conservative Political Action Committee Full Name, Mailing Address and ZiF Code Particulars of Expenditure Dete Imansh. Loan for Don Lyon for day, year l turn the served Martin Advertising Congress IL-16 8320 Old Courthouse Rd. #430 12/18/19 4,000,00 Vienna, VA 22180 Expend-ture for Difference Constant Ag. yr to date-( Full Name, Mailing Address and ZIP Code Particulars of Expenditure Date (month) Amount of our P san day, year! Citizen's Advocate PAC Loan Box 11628, Pioneer Station 12/27/79 4,000.00 Salt Lake City, UT 84147 Expenditure for Ag. yr. to date-( Primary ☐ General ☐ Other Full Name, Mailing Address and ZIP Code Particulars of Expenditure Date knonth. Amount of each respond dey, year) Expenditure for Ag. yr. to date-( Primary General Other Particulars of Expenditure Date (month, Amount of our espera Full Name, Mailing Address and ZIP Code ture this car od day year) Expenditure for Ag. yr. to date-( Primary General Other Particulars of Expenditure Date Imonth, Amin's of 40.0 14. .... Full Name, Mailing Address and ZIP Code ture that can be day year? Expend ture for Ag. yr. to date-( DiPrimary General Other Particulars of Expenditure Date Imonth. Amount of each sage. Full frame, Mailing Appress and ZIP Code day, year) ture that served Expenditure for Ag. yr. th date-( Primary General Other Dare Imonth Amount of tal tree ! Particulars of Expenditure Full frame, Mailing Addiess and ZiP Code day, year! burg this period Expenditure for Ag. yr. th date-( Primary | General | Other Usto Imonth. Account of our to country Parsiculars of Expenditure Full frame, Mailing Address and 21P Code \$w0 \$64 \$m-.01 day vear)

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SCHEDULE C NE VISED January, 1978 Federal Election Commission 1325 K Street, NW. Washington, D.C. 20463



#### DESTS AND OBLIGATIONS



Supporting Line Numbers 12 and 13 of FEC FORM 3

(Indicate Primary or General Election for each Entry)

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Name of Candidate and Committee in Full

#### National Conservative Political Action Committee

Full Name, Mailing Address and ZIP Code of Debtor at Creditor Date Smonth, mount of Original Curiciation day, year) Orbit Contract, National Defense Council Pay mane Apreement or 2121 P St. #232 Washington, DC 20037 To Dete Close of Promise This forest 1/10/78 5,000.00 5,000.00 -0-D Primary 1) General D Other

NATURE OF OBLIGATION (Details of Debt)

#### Loan outstanding

Skilled & Professional Political Action Committee	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Ovistanding Batance at Close of This Period
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#### Loan Outstanding

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Ohio Conservat 16 East Broad Columbus, OH	tive Politi \$416		Mary Sant	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at One of This Period
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Loan Outstanding

SCHEDULE C REVISED January, 1978 Federal Election Corr. nie 1325 K Street, N.W. Washington, D.C. 20463

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#### DEBTS AND OBLIGATIONS



Supporting Lina Numbers 12 and 13 of FEC FORM 3

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Nume of Candidate and Committe National Conservat		cal Actio	on Committ	40			
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#### ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind, Other Income, Loans, Refunds)

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

Page 1 or 1 to

(Lite Separate Schedules for

Name of Candidate or Committee in Full			
National Conservative Politic		-	
Full Name Mailing Address and ZIP Code Jed Richardson for Congress	Principal Place of Business	Dete (month, day, year)	Amount of each Receipt this Period
P.O. Box 1059 Provo, UT 84602	Same	]	Ţ
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#### FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463



Susan S. Hannegan, Treasurer National Conservative Political Action Committee 1500 Wilson Blvd. Suite 513 Arlington, VA 22209

Identification No: C00024687

Reference: April Monthly Report (3-1-80 to 3-31-80)

Dear Ms. Hannegan:

This letter is prompted by the Commission's preliminary review of your April Monthly Report. The review raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act. An itemization of these areas follows:

- Your debt schedule (Schedule D) discloses payments this period to: Richard A. Viguerie Co., American Mailing Lists and Medi-America of \$68,670; \$5,376; and \$30,486 respectively. However, a review of your expenditure schedules (Schedule B and Schedule E) discloses total payments, to the above-mentioned entities respectively, of only \$58,402; \$3,039; and \$23,703.

An amendment to your original report correcting the above problems should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,

Mark Kleinman

Reports Analyst

Reports Analysis Division

SCHEDULE D (Revised 3/80)

#### DEBTS AND OBLIGATIONS Excluding Loans

Page 2 of 2 LINE NUMBER 10 (Use separate Schedules for each numbered light)

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Name of Committee (in Full) National Conservative Political Action Committee	Oristanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Closs of This Period	
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Cleveland, OH 44190	14574.49	2305.76	9796.12	7084.13	
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D. Full Name, Mailing Address and Zip Code of Deptor or Creditor	1				
Richard A. Viguerie Co. Inc. 7777 Leesburg Pike					
Falls Church, VA 22043	147046.98	75513.13	68670.60	153889.5	
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#### ITEMIZED DISBURSEMENTS

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

Purpose of Disbursement

Name of Committee (in Full)

A. Full Name, Making Address and ZIP Code

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

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Name of Committee (in Fuel)

National Conservative Political Action Committee

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Capitol Hill Club 300 First St. SE Washington, DC 20003	Dues Disbursement for: @Primery = General  Disbursement for: @Primery = General	3/24/80	25.00
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International Fulfillment Cor 5010 46th Ave.		3/24/80	Disbursement This Pen
Hyattsville, MD 20781	Disbursement for: © Primary © General © Other (specify):		24.00
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1500 Wilson Blvd. #512 Arlington, VA 22209	Corner (specify)	1	44.80

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10400 Connecticut Ave. \$405 Kensington, MD 20795	Disbursement for: © Primary © General C Other (specify):	3/25/80	680.00
C. Full Name, Mailing Address and ZIF Code	Purpose of Disbursement	Date Imonth,	Amount of Each
Press Intelligence, Inc.	clipping service	day, yearl	Disbursament This Period
734 - 15th St. NW Washington, DC 20005	Disbursement for: © Primary © General © Other (specify):	3/25/80	91.28
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7600 Old Springhouse Rd. McLean, VA 22102	Disbursement for: © Primary © General © Other (specify):	3/25/80	1767.45
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Pitney Bowes	eq ipment expense	day, year)	Disbursement This Period
Walter H. Wheeler, Jr. Dr. Stamford, CT 06904	Disbursement for: ©Primary ©General © Other (specify):	3/25/80	119.12
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	Disbursement for: © Primary © General © Other (specify)	3/27/80	143.98
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Richard A. Viguerie Co. Inc.	computer, delivery & reference services	day, year)	Disbursement This Period
	Disbursement for: © Primary © General © Other (specify)	3/28/80	4138.95

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# DEBTS AND OBLIGATIONS Excluding Loses

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8. Full Name, Mailing Address and Zie Code of Dabser or Cracker Berlin & Jones Co. Inc. P.O. Box 4294 New York, NY 10049	6249.11	3449.04	5439.11	4259.04
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C. Full Name, Nailing Address and Zip Code of Depart or Creditor Diversified Direct, Inc. 2936 Prosperity Ave. Pairfax, VA 22031	21519.92	1908.12	11251.22	12176.82
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D. Full Name, Mailing Address and Zip Code of Debbor or Creditor Diversified Mailing Services 7777 Leesburg Pike Falls Church, VA 22043	50697.60	9454.13	30486.18	29665.55
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E. Full Name, Making Address and Zip Code of Dibbor or Creditor MediAmerica, Inc. 1900 North Beauregard St. Alexandria, VA 22311	7493.85	-0-	4148.00	3345.85
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F. Full Name, Mailing Address and Za_Qode of Debtor or Creditor Metro Printing & Mailing 1200 Sterling Blvd. Sterling, VA 22170		6409.16	7623.90	13362.83
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Name of Committee (in Full)

National	Conservative	Political	Action	Comittee
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A. Pull Name, Mailing Address and ZIP Code	Purpose of Disbursament	Dess Imprets,	Amount of Ea
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302 Youngs Cliff Rd. Sterling, VA 22170	Disbursement for: © Primary © General © Other (specify):	3/31/80	611.51
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Patricia M. Owens	Salary	day, year)	Didbursomers This
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Bryan H. Wirwicz	Salary	day, year)	Disbursement This I
4112 S. 36ht St. Arlington, VA 22204	Disbursement for: Offrimery OGeneral O Other Ispecify):	3/14/80	204.36
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American Mailing List Corp 7777 Leesburg Pike	Mail List rental	dey. year)	Disbursement This I
Falls Church ., VA 22043	Disbursement for: ©Primary ©General © Other (specify):	3/3/80	724,91
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East Rutherford, NJ 07070	Disbursement for: © Primary © General © Other (specify):	3/3/80	1460.00
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Computer Business Supplies P.O. Box 15680	printing services	393/80	Disbursement This F
Baltimore, MD 21263	Disbursement for: © Primary © General © Other (specify):	]	730.00
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Name of Committee (in Full)

National	Conservative	Political	Action	Committee
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S. Full Name, Mailing Address and ZIP Code Prep, Inc.	Purpose of Disbursement	Date Imonsh,	Amount of Each
2611 Shirlington Rd. Shirlington, VA 22206	Printing Services	3/14/80	Disbursement This Parlet
	D Other Ispecify):		4528.00
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Fairfax, VA 22031	Disbursement for: © Primery © General © Other (specify):	3/14/80	800.00
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Internal Revenue Service 3131 Democrat Rd.	Tax expense	day. year) 3/14/80	Disbursement This Perio
Memphis, TN 37501	Disbursement for: ©Primary © General © Other (specify):	]	201.25
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Acro Van Lines	Storage expense	day, year) 3/15/80	Disbursement This Perio
7913 Yarnwood Ct. Springfield, VA 22153	Disbursement for: © Primery © General © Other (specify):	]	30.00
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date Imonth,	Amount of Each
Richard A. Viguerie Co.	Direct Mail fees	day, year)	Disbursement This Peri
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Amy information copied from such Reports and Statuments may not be sold or used by any person for the purpose of soliciting contributions or for some commercial purposes, other than using the name and address of any political committee as solicit contributions from such committee.

Name of Committee (in Full)

National Conservative Political Action Committee

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#### ITEMIZED DISBURSEMENTS

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Name of Committee (in Full)
National Conservative Political Action Committee

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SUETOTAL of Dispursements This Page (optional)			
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			188,682.88

Note: In reviewing the April Monthly RFAI, for this referral,

I discovered an error with regards to Medi-America, and
thus, it should be ignored.

Mark Kleinman

ATTACHMENT #7

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TELECON TO THE FILE: NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE

FROM: MARK KLEINMAN

DATE: 6-24-80

RE: More time needed to respond

I spoke with Susan Hamnegan 522-2800, Treasurer. She explained, to me, that she still needed more time to respond to RFAIs. She mentioned, that most of the RFAIs dealt with matters, before she had become Treasurer (the old Treasurer was Becki Burlingame).

I stated that we could not give an extension of time, but that she might want to send something to the Commission stating that they were in the process of responding.

Susan Hannegan, Treasurer 522-2800

ATTACHMENT #8

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National Conservative
Political Action Committee

1500 wilson blvd. suite 513 arlington, va. 22209 (703) 522-2800

Mark Kleinman Federal Election Commission Washington, D.C. 20463

Dear Mr. Kleinman,

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As I explained in our conversation in reference to your letters dated June 3, 1980 concerning our monthly reports for August/September 1979, November 1979, December 1979, Year End 1979, February 1980, and April 1980, it will be necessary for me to have an extention of time to look into each report. I have only been with NCPAC a short time and due to the fact that the reports in question date back as far as they do, I'm sure you understand the reasons for my request. I will be filling ammendments to these reports one at a time over the next few months.

I appreciate your co-operation and understanding in this matter. If you should have any questions, please feel free to contact me the number is (703) 522-2800.

Sincerely,

Susan S. Hannegan

Susan S. Harregan

Treasurer

SSH:ech

ATTACHMENT #9

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#### FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

July 2, 1980

Susan S. Hannegan, Treasurer National Conservative Political Action Committee 1500 Wilson Blvd. Suite 513 Arlington, VA 22209

Identification No: C00024687

Reference: 1979 September, November, December Monthly Reports and Year

End Report; 1980 February, April Monthly Reports

Dear Ms. Hannegan:

This letter is to inform you that as of this date, the Commission has not received your response to our request for additional information, dated June 3, 1980. That notice requested information essential to full public disclosure of your Federal election financial activity and to ensure compliance with provisions of the Federal Election Campaign Act (the Act). A copy of our original request is enclosed.

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Mark Kleinman on our toll-free number (800)424-9530 or our local number (202)357-0026.

Sincerely,

Thomas J. Haselhorst Assistant Staff Director

Reports Analysis Division

Enclosure

ATTACHMENT #10

The committee has only responded to the September Monthly request regarding cash-on-hand. All other RFAIs have <u>not</u> been responded to, at all.

It should be noted, with regards to the two entries on Schedule E, "Target '80" and "Anyone But Culver", that if the transfers were to other committees, with the activity, in question, might trigger registration requirements for both "Target '80" and "Anyone But Culver".

# National Conservative RECEIVED Political Action Committee on the state of the state

1500 wilson blvd. suite 513 arlington, va. 22209 (703) 522-2800

July 30, 1980

HAND DELEST.

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

Dear Sirs:

Upon reviewing the National Conservative Political Action Committee's (NCPAC's) FEC report for August 1979 wich covers the period from Aug. 1 through Aug 31, I have come accross several corrections which you should be made aware of.

There was an error in addition on the contributions for Schedule A, Line 11. The new total is \$217,823.27. I have also enclosed a new itemized contributor listing which replaces any listing you may have on file for this reporting period.

On Schedule B, Line 19 the total was in error and should be changed to \$137,492.78, this was due to a number of corrections which are as follows: Page 3 of 17 Prep, Inc. changed to \$3,459.73 and the Lewis Co. expenditure should not have been listed on this schedule, Page 6 of 17, Check to Olivetti Corp. was voided, Page 7 of 17 Daniel C. Beck changed to \$225.04, Page 11 of 17, Quality Inn Capitol Hill changed to \$586.40, page 16 of 17, MediAmerica, Inc. changed to \$6,516.80 and line 4 MediAmerica, Inc. (dated 8/29) changed to \$115.50 and on page 17 of 17 the returned checks and bank charges changed to \$400.84.

Schedule B Line 21 was also in error, an excenditure to MediAmerica, Inc. was previously listed on the wrong schedule, it was an In Kind Contibution to Mr. Ed King in the amount of \$4,165.80, this changes the schedule total to \$5,165.80.

Schedule E (Independent Expenditures) total should be changed to \$35,623.42. This is mainly due to the fact that most of these expenditures were listed on other schedules by mistake, the corrections are as follow: page 12 of 25, MediAmerica, Inc. line 3 \$623.22 for F. Church, Line 4 \$3,591.74 for A. Cranston and line 5 \$3,591.73 for J. Culver, Page 13 of 25, MediAmerica, Inc. Line 1 \$3,591.73 for B. Bayh and Line 2 for G. McGovern. Page 14 of 25, HBCI Television \$0.75 for F. Church and A.C. Printing changed to \$166.00, page 15 of 25 line 1, APS Leasing changed to \$138.40, page 16 of 25 line 1, Idaho Statesman changed to \$452.25, page 17 of 25 Kalbus Office Equipment, line 3 changed to \$109.15, page 21 of 25, Radio Shack changed to \$32.86. Also nages 23 of 25, 24 of 25 and 25 of 25 were completely added.

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'90 AUG 0 ... 3:3

FEC Letter July 30, 1980 Page 2

The figures on the original summary page have all been changed due to the corrections listed above and a correction in the opening cash—on—hand figure on the January Report. I have enclosed a copy of the correct and complete report for your convience.

Please accept this as an amendment to the August Monthly (8/1/79 - 8/31/79) Report. If there are any questions about these corrections, please feel free to call me.

Sincerely,

Susan S. Hannegan

Treasurer

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# REPORT OF RECEIPTS AND DISBURSEMENTS For a Political Committee Other Than an Authorized Committee | AUG | 0 | 15 | 3 | 3 |

(Summary Page)

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1. Name of Committee (in Full)	4. TYPE OF	REPORT (check approp	oriate boxes)
National Conservative Political Action	(a) 🔲 A	April 15 Quarterly Repor	1
·		luty 15 Quarterly Report	
Address (Number and Street)		October 15 Quarterly Re	port
1500 Wilson Blvd., Suite #513		lanuary 31 Year End Res	oort
!		luly 31 Mid Year Report	(Non-election Year Only)
City, State and ZIP Code	<b>X</b>	Monthly Report for Au	gust 1979
Arlington, Virginia 22209	_	Twelfth day report prece	(Type of Election)
= Check if address is different than previously reported.		election on	
2. FEC Identification Number C00024687			owing the General Election  he State of
3. This committee qualified as a multicandidate com-		Termination Report	
mittee during this Reporting Period on(date)	(b) 1s t	his Report an Amendme	n:? : NO
SUMMARY		Column A This Period	Column B
5. Covering Period <u>8/01/79</u> Through <u>8/31/79</u>		I nis Period	Calendar Year-to-Data
6. (a) Cash on Hand January 1, 19.79			s 13,122.99
(b) Cash on Hand at Beginning of Reporting Period		s 57,255.39	
(c) Total Receipts (from Line 18)	• • • • • • • • • • • • • • • • • • • •	s 217,823.27	s 1,160,019.17
(d) Subtotal (add lines 6(b)) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)	· · · · · · · · · · · · · · · ·	s 275,078.66	s 1,173,142.16
7. Total Disbursements (from Line 28)	· • • · · · · · · · ·	s 183,282.00	s 1,091,345.50
8. Cash on Hand at Clore of Reporting Period (subtract line 7 fo	om 5(a))	S 91,776.66	s 91,796.66
9. Debts and Obligations Oxed TO the Committee (Itemize all on Schedule Clor Schedule D)		s 15,252.60	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	· • • • • • • • • • • • • • • • • • • •	s 330,815.02	
Egertify that I have examined this Report and to the best of my knowled it is strue, correct and combiste.	ige and be of	For furthe	r information, contact:
Susan S. Hannegan		Tou Fr	l Election Commission de 800-404-953 <b>0</b> 200-523-40-88

July 30, 1980

Type or Print Name of Treasurer

SIGNATURE OF TREASURER

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

(Summary Page)

11 4:52

For turner information, contact

Federal Elestion Commission Too Free 000404 9530 Const (00 0004068

#### 4 THE OF HUMBER CONDING CONTROLLED ARE Nam- of Committee to Full National Conservative (a) April 15 Quarterly Report Political Action Committee July 15 Quarter , Report Address (Number and Street) October 15 Quarterly Report 1500 Wilson Blvd. #513 January 31 Year End Report July 31 Mid Year Report (Non-election Year Only Monthly Report for September 1980 City, State and ZIP Co ie Twelfth day report preceding (Type of Election) 22209 Arlington, Va. election on \_\_\_\_\_\_ in the State of \_ Til Check if address is different than previously reported Thirtieth day report 10/10% ng the General Election 2. FEC Identification Number C00024687 \_\_\_\_\_ in the State of \_ 3. This committee quantied as a multicandidate com Termination Report (b) Is this Report an Amenoment? DXYES DIN mittee during this Reporting Period on L SUMMARY Column : Culumn 5 9/30/79 This Period Colendor Year to Date 9/1/79 s13,122.99 6 (a) Cash on Hand Jacuary 1, 19<u>79</u> s 91,796.66 (b) Cash on Mand at Beginning of Peparting Pariod . . . (c. Total Receipts (from Line 13)..... \$ 263,864.74 ·51,423,8**8**3.91 to Subtotic ladd lines flip, and Sich for Column Aland s1,437,006.90 s 355,661.40 Times 5 (an and 6 ich for Column 3), . . . . . . . . . . . 7. Total Discursements (from Line 28) ... ·\$1,317,350.82 <sup>S</sup> 236,005.32 8. Cash on Hand at Close of Ruporting Period (subtract line 7 from 6(a)). ...\$ 119,656.08 £119,656.08 9. Depts and Opligations Owed TO the Committee Items (4.3) on Streduck Clor Scredule D1 . . 15,525.60 10. Depts and Obligations Owed BY the Committee . s **357,**483.84 Htemize all on Groenule Cor Schedule Dr. . . . . .

Biggie to grant house gearmining in a few ort unit to the test of my endiscribe in the inf

it is then correct and commete

Susan S. Hannegan

REPORT OF RECEIPTS AND DISBURSEMENTS

For a Political Committee Other Than an Authorized Committee (1) 1015 P4:5

1. Name of Committee (in Full) 4. TYPE OF MEPORT shack as pro-National Conservative Political Action (a) April 15 Quarterly Report Committee July 15 Quarterly Report Address (Number and Street) 1500 Wilson Blvd. October 15 Quarterly Report Suite #513 January 31 Year End Report July 31 M a Year Report (Non-election Year Only) Monthly Report for October 31,1979 City, State and ZIP Code Arlington, VA Twelfth day report preceding \_ \_ in the State of \_ Check if address is different than previously reported. Thursieth day report following the General Election 2. FEC Identification Number \_\_\_\_\_ in the State of \_ C00024687 3. 2. This committee qualified as a multicandidate com Term nation Report (b) Is this Report an Amendment? mittee during this Reporting Period on ... X YES (date) = NO SUMMARY Column A Column 5 This Pariod Calendar Year-to-Dave 10/31/79 10/1/79 s13,122.99 6. (a) Cash on Hand January 1, 19 79. (b) Cash on Hand at Beginning of Reporting Period . s 119,656.08 ic: Total Receipts (from Line 18)...... S 264,643.64 <sup>. S</sup>1,6<u>88,527.55</u> to. Subtotal (add lines 6 ip) and 6 ic) for Column A and

(Summary Page)

Figure, by that I have examined this Report and to the best of my knowing relation of it is thue, correct and complete.

lines 6(a) and 6(c) for Column B).....

8. Cash on Hand at Close of Reporting Period (subtract line 7 from Sids)

Susan S. Hannegan

Tipe or Print Name of Treasurer

7. Total Dispursements (from Line 28) . . . . . . . . . . .

 Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D) . .

 Debts and Obligations Owed BY the Committee (Itemize all on Schedule Clor Schedule D).

For further information, contact:

\$1,701,650.54

S1,645,917.41

55,733.13

s 384,299.72

329,566.59

55,733.13

15,252.60

s 295,009.71

Fodera: Election Commission To: Friv. 800 474-9830 Livius 200 820-4069 ATTACHTENT #11

er

The committee filed amendments changing the cash-on-hand, for the Report which was RFAIed. However, this resulted in throwing off the cash-on-hand totals of the subsequent reports. The committee did file amendments changing the appropriate cash figures through the December Monthly 1979, but the Year End Monthly has not been amended to account for the changes made on the December Monthly Amendment. Thus, the cash discrepancy is:

December Monthly Amendment - ending cash-on-hand \$47,919
Year End Report - beginning cash-on-hand 37,544

Discrepancy 10,375

HAND DILIVERED

### REPORT OF RECEIPTS AND DISBURSEMENTS. For a Political Committee Other Than an Authorized Co. E. L.V. E.D.

(Summary Page)

¥	O DOME OF	5 , 22
Name of Committee (in Full) National Conservative	4. TYPE OF REPORT ICHOCK sprop	riate 50 108)
Political Action Committee	(a) April 15 Quarterly Report	t
•	July 15 Quarterly Report	
Address (Number and Street)	October 15 Quarterly Rep	port
1500 Wilson Boulevard Suite 513	January 31 Year End Rep	oor
	July 31 Mid Year Report	(Non-election Year Only)
City, State and ZIP Code	Monthly Report for No	ovember 1979
Arlington, VA 22209	Twelfth day report prece	ding
= Check if address is different than previously reported.	election on	
	Thirtieth day report follo	wing the General Election
2. FEC Identification Number C00024687	on in the	he State of
3. = This committee qualified as a multicandidate com-	Termination Report	
mittee during this Reporting Period on (deta)	(b) Is this Report an Amendme M YES	nt? : NO
SUMMARY	Column A This Period	Column B Calendar Year-to-Date
5. Covering Period 11/1/79 Through 11/3	0/79 Ins Period	Calendar Year-to-Date
6. (a) Cash on Hand January 1, 19.79		s 13,122.99
(b) Cash on Hand at Beginning of Reporting Period	s 55,733.13	
(c) Total Receipts (from Line 18)	s <sub>299,323.75</sub>	\$ 1,987,851.30
(d) Subtotal (add lines 6(b)) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)		s 2,000,974.29
7. Total Disbursements (from Line 28)	s <sub>307,137.47</sub>	\$ 1,953,054.88
8. Cash on Hand at Close of Reporting Period (subtract line	7 from 6(d)) \$ 47,919.41	s 47,919.41
9. Debts and Obligations Owed TO the Committee {tremize all on Schedule C or Schedule D},	s	
Debts and Obligations Owed BY the Committee     (Itemize all on Schedule C or Schedule D)	s343,456.55	1877.45.20

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

Susan S. Hannegan

Type or Print Name of Treasurer

SIGNATURE OF TREASURED

0

For further information, contact:

Federal Election Commission Toll Free 800-424-9530 Local 202-523-4088 FEC FORM 3 REVISED January, 1978 Federal Election & mmission 1325 K Street, N.W. Washington, D.C. 20463

### OH A CANDIDATE OR COMMITTEE SUPPORTING CANDIDATE(S) FOR NOMINATION OR ELECTION TO FEDERAL OFFICE

10015 24

(Except for Candidates or Committees Receiving Federal Matching

National Conservative	e Political Action Comm.		
Name of Candidate or Committee (in fult) 1500 Wilson Blvd. \$5		N/A	ate/Committee
Address (number and street) Arlington, VA 22209	3 <sub>0</sub>	Office Sought, State/District Gf as	pplicable)
City, State and ZIP Code	Dicheck if address is different than pr	reviously reported.	Year of Election
4 Type of Report Scheck appropriate boxes	3		
April 10 Quarterly Report	Tenth day report preceding	election D	Termination Report
July 10 Quarterly Report	on in the State of	D	Amendment for:
October 10 Quarterly Report	Thirtieth day report following	election	(which report)
Monthly Report	on in the State of	o convention)	•
	44.44		
(month)  This is a report for Primary El	idate)  ection General Election Pri	mary and General Doth	er (special, runoff, etc.)
(month)		(PENDITURES st dollw.)	
(month)	SUMMARY OF RECEIPTS AND EX (Figures may be rounded to neares	PENDITURES	Column B Calendar Year-To D
S Covering Period 12/1/79 Th	SUMMARY OF RECEIPTS AND EX (Figures may be rounded to neares	PENDITURES st dollar,)  Column A This Period	Column B Calendar Year To D
S Cavering Period 12/1/79 The Cash on Rand January 1, 19	SUMMARY OF RECEIPTS AND EX (Figures may be rounded to neares	Column A This Period	Column B Calendar Year To D
S Covering Period 12/1/79 The Cash on hand January 1, 19	SUMMARY OF RECEIPTS AND EX (Figures may be rounded to neares	Column A This Period	Column B
fmonth)  This is a report for Primary El  5 Covering Period 12/1/79 Th  6 Cash on Rand January 1, 19  7 Cash on Rand at beginning of reporting p	SUMMARY OF RECEIPTS AND EX (Figures may be rounded to neares prough 12/31/79	Column A This Period  s 37,544.35 s277,138.46	Column B Calendar Year To D
5 Covering Period 12/1/79 The 6 Cash on Rand January 1, 19 7 Cash on Rand at beginning of reporting 5 8 Total receipts (from line 19)	SUMMARY OF RECEIPTS AND EX (Figures may be rounded to neares crough 12/31/79	Column A This Period  \$ 37,544.35 \$ 277,138.46 \$ \$314,682.81	Column B Calendar Year To D  \$ 10,490  \$ 2,242,608. \$ 2,253,099.
#month! This is a report for Primary El  5 Covering Period 12/1/79 Th  6 Cash on hand January 1, 19  7 Cash on hand at beginning of reporting p  8 Total receipts (from line 19).  (a) Subtotal (Add lines 7 and 6 for Colu	SUMMARY OF RECEIPTS AND EX (Figures may be rounded to neares arough 12/31/79.  Deriod	Column A This Period  s 37,544.35 s277,138.46 s314,682.81 s269,423.64	Column B Calendar Year To C  \$ 10,490  \$ 2,242,608. \$ 2,253,099. \$ 2,207,629.
fmonth)  This is a report for Primary El  5 Covering Period 12/1/79 Th  6 Cash on Rand January 1, 19  7 Cash on Rand at beginning of reporting p  8 Total receipts (from line 19)	SUMMARY OF RECEIPTS AND EX (Figures may be rounded to neares arough 12/31/79.  Decriod	Column A This Period  s 37,544.35 s277,138.46 s314,682.81 s269,423.64	Column B Calendar Year To D  \$ 10,490  \$ 2,242,608. \$ 2,253,099. \$ 2,207,629. \$ 45,259.
### This is a report for Primary El  5 Covering Period 12/1/79 Th  6 Cash on hand January 1, 19  7 Cash on hand at beginning of reporting p  8 Total receipts (from line 19).  (a) Subtotal (Add lines 7 and 6 for Colu  8 Total expenditures (from line 25)  10 Cash on hand at close of reporting period  11 Value of contributed items on hand to b  (Attach itemized list)	SUMMARY OF RECEIPTS AND EX (Figures may be rounded to neares arough 12/31/79.  Decriod	Column A This Period  s 37,544.35 s277,138.46 s314,682.81 s269,423.64 s 45,259.17	Column B Calendar Year To D  \$ 10,490  \$ 2,242,608. \$ 2,253,099. \$ 2,207,629. \$ 45,259.

(Date)

(Typed Name of Treasurer or Candidate)

ATTACHMENT #12

3 ( ) ( ) 5

Attached are subsequent reports to the April Monthly 1980 report, which have the same problem, as the previous reports. Listed are the vendors for which the payment this period on Schedule D is less than the total payments on the expenditure schedules of the respective reports (Schedule B and Schedule E). The payments should at least be greater than the amounts reported as being paid on Schedule D. Any discrepancies could suggest possible 2 U.S.C. 441b violations---- corporate contributions--- if the amounts were either dropped or the terms of a debt settlement not sufficient to the test of 11 CFR 114.10.

#### JUNE MONTHLY

Vendor	Payments This Period (Schedule D)	Payments Reported Expenditure Schedules (Schedule B and E)
Prep, Inc.	15,962	12,706
Metro Printing	6,365	4,310

SCHEDULE D (Revised 3/80)

# DESTS AND OBLIGATIONS Excluding Loans

Like but to far 10.

National Conservative Political Action Committee	Overboding Belance Basining This Paried	Amount Incurred This Period	Psymane This Pariod	Outstanding Bolonce at Clear of This Ported
Metro Printing & Mailing Address and Zio Code of Debtser or Creditor Metro Printing & Mailing 1200 Sterling Boulevard Sterling, VA 22170	11,157.84	1,472.33	6,365.84	
wrume of Duby (Purpose): Printing Service: Accts Payable	The Street	20423		
Mt. Vernon Publishing Co., Inc. 810 N. Fairfax Street Alexandria, VA 22314		2,407.10	1,508.83	3,594.78
Number of Debt (Purpose): Printing Service: Accts Payable		10-11-51	Page 1 to 1	\$ 3. T. 446
C. Full Name, Mailing Address and Zio Code of Dector or Creditor Prep, Inc. 2611 Shirlington Road Arlington, VA 22206	1	19,389.77	15,962.23	31,119.85
Neture of Debt (Purpose): Printing/Typesetting: Accts Pay	الله الما			end ji.
D. Full Name, Mailing Address and Zio Code of Debtor or Creditor Response Graphics P. O. Box 92608-T Cleveland, OH 44190	5,484.13	-0-	2,000.00	3,484.13
Neture of Debt (Purpose): Supplies/Printing-Accts Payable	\$ 25,000	10 Tr. 18	A POLICY	
E. Full Name, Mailing Address and Zio Code of Debtor or Creditor Richard A. Viguerie Co. 7777 Leesburg Pike Falls Church, VA 22043	1	0 32,631.0	7 46,640.7	3 113,586
Nature of Debt (Purpose): Computer-list renta & mailing fees-Accts Payable				S. Section
F. Full Name, Mailing Address and Zio.Code of Debtor or Creditor Wiland & Associates 219 East Davis Culpeper, VA 22701		18,707.32	-0-	18,903.7
Nature of District (Pursons) Computer & Mail Handling Service-Accts Payable				
1) SUBTOTALS This Period This Page (optional)				176,953.6
				262,216.2
2) TOTAL This Period (lest page this line enly)	<b>.</b>	• • • • • • • • • • • • • • • • • • •	• • • • • • • · · • • •	4202,210.2

BCHEDULE S

#### ITEMIZED INDEPENDENT EXPENDITURES

--- 24 - 40 ---

(See Reverse Side for Instructions)

Name of Committee (in Pull) National Conservative Pol Committee Full Name, Making Address & ZIF Cons			C0002	
of Each Payee	Perpose of Expone ture	Dete imprish, day, year)	Amount	have of Feeral Considers supported or expense by the expenditure & other tought
National Republican Congressional Committee	Travel Expense	5/2/80	3.46	Bayh U.S. Senate
51 - 151 1 51				( Susseri ( Consent
Diversified Direct, Inc. c/o U.V.B. Box 179 Alexandria, VA 22209	Printing	5/2/80	3,411.07	Kennedy U.S. President
				☐ \$1000×1
Reponse Graphics P. O. Box 92608-T Cleveland, OH 44190	Printing	5/2/80	1,000.00	Kennedy U.S. President
				Support Copper
Prep., Inc. 2611 Shirlington Road Arlington, VA 22206	Printing	5/2/80	1,000.00	Kennedy U.S. <b>Presid</b> ent
				☐ 5+000011 <b>Ž</b> C000000
Prep., Inc.	Printing	5/2/80	43.18	Church U.S. Senate
•				☐ \$-000rt <b>(</b> ) Dogge
Prep., Inc.	Printing	5/2/80	43.18	Cranston U.S. Senate
				□ Success P Occess
(a) SUBTOTAL of Itemized Independent Expenditu			s 5.500.89	
(b) SUBTOTAL of Unitermized Independent Expendi (c) TOTAL Independent Expenditures	TUTES		"	i s
nder penalty of perjury 8 certify mat the independenties before not made in cooperation consultation conducts or suggest on of any candidate or any authorize 8 bach candidate or enterements.	ncerrienth or at the ed committee or agent	Subscribed an	d sworn to before me	this the 2f
id not involve the financing of dissemination, distribution whole of in part of any campaign materials prepared	ition, or recublication	Wr Commission		
ambaigh committee, or their agent		-		48. F.B. C
Serature	Date		•••	

SCHEDULS S

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### ITEMIZED INDEPENDENT EXPENDITURES

--- 25 - 40 ---

(See Reverse Side for Instructions)

National Conservative Political Action Committee Full Name Making Access & 219 Cook			C00024687		
el Eash Payes	Furtion of Expenditure	Dete (manth, day, year)	Amount	Name of Four & Core recovered or common to	
Prep., Inc.	Printing	5/2/80	\$ 43.18	Culver U.S. Senate	
Prep., Inc.	Dut			□ Support \$ Com	
- rep., anc.	Printing	5/2/80	43.18	McGovern U.S. Senate	
Prep., Inc.	Detect			□ Success 1 3 Con	
•	Printing	5/2/80	43.19	Bayh U.S. Senate	
fount Vernon Publishing	Printing	5/2/80		☐ Support	
Co., Inc. 310 N. Fairfax Street Alexandria, VA 22314		3/2/80	249.60	Bayh U.S. Senate	
fount Vernon Publishing				□ Success X Dec	
Co., Inc.	Printing	5/2/80	249.60	Chruch U.S. Senate	
fount Vernon Publishing				□ S.2000 - Ø 200	
So., Inc.	Printing	5/2/80	249.60	McGovern U.S. Senate	
				□ Success ■ Our	
SUSTOTAL of Itemized Independent Expenditures SUSTOTAL of Unitemized Independent Expenditur TOTAL Independent Expenditures	** **		878.35		
er pensity of persons travels, that the			İ	5	
or density of derivity. I certify that the independent ein more not mode in cooperation consistation concepts of the care not more in cooperation consistation concepts. The care date of authorized committee flustretimore for candidate or authorized committee flustretimore for the original transition of the care of th	rriverthi or at the Committee or agent These expenditures	ו בית משפייאבעל	morn to before me		
hole or in part of any campaign materials propered by the committee or their agent	A Drifebublication : 1° e candidate inis	We Commission	19		

41, Commason #10-196

15 '44 1 7. 0. 5

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#### ITEMIZED INDEPENDENT EXPENDITURES

Page 34 at 40 Page

(See Reverse Side for Instructional

National Conservative Poli Committee			C0002	
of Eath Payor	Purpose of Expanditure	Dete umontn, day, year)	Amount	Nume of Federal Consideral supported or constant by st expenditure & office tough
Diversified Mailing Svc.	Computer Service & Mailing Service	5/23/80	\$ 122.37	Cranston U.S. Senate
Diversified Mailing Svc.	Computer Service & Mailing Service	5/23/80	\$ 122.37	Culver U.S. Senate
Diversified Mailing Svc.	Computer Service & Mailing Service	5/23/80	\$ 122.36	Church U.S. Senate
Diversified Mailing Svc.	Computer Service & Mailing Service	5/23/80	\$ 122.36	McGovern U.S. Senate
Diversified Mailing Svc.	Computer Service & Mailing Service	5/23/80	\$ 122.37	Bayh U.S. Senate
Prep., Inc.	Printing	5/23/80	\$ 253.70	Culver U.S. Senate
a) SUBTOTAL of Itemized Independent Expenditures			865.53	Success S Connect
b) SUSTOTAL of Unitermized Independent Expenditu c) TOTAL Independent Expenditures				is
nder penalty of perjury I certify that the independent e trein wire not made in cooperation, consultation, conci- quest or suggestion of any candidate or any authorized issum candidate or authorized committee. Furthermore	radenditures reported ert with, or at the committee or agent	Subscribed at		* (**)

SOULS S

### ITEMIZED INDEPENDENT EXPENDITURES

Page 35 as 40 Page

15ee Reverse Side for Instructional

Name of Committee (in Putt)		<del></del>	1	
National Conservative Po	litical Action		C00024	687
Fusi Name, Mosting Address & 217 Cade of Each Payee	Aurpois of Expansions	Date umentn, day, year)	Amount	Name of Foderal Candidate supported or opposed by the expenditure & office sought
Prep., Inc.	Printing	5/23/80	\$ 253.70	
Prep., Inc.	Printing	5/23/80	\$ 253.71	Cranston
	·			U.S. Senate
Prep., Inc.	Printing	5/23/80	\$ 253.71	McGovern
				U.S. Senate
Prep., Inc.	Printing	5/23/80	C 252 70	☐ Support ☐ Oppose
		3/23/80	\$ 253.70	Bayh U.S. Senate
The Richard A. Viguerie	Mail Ties De-	15.100.100		□ Succert 000004
Co.	Mail List Renta & Mail Fees	5/23/80	\$6,864.08	Kennedy U.S. Senate
EVA-Tone Soundsheets	Production	5/29/80	272 00	☐ \$-0001
2051 Waukegan Road Deerfield, IL 60015	Cost	3/29/80	\$ 272.00	McGovern U.S. Senate
In Suppose Annual Control of the Con				□ Support 💢 Oupone
GI SUBTOTAL of Itsmized Independent Expenditu BI SUBTOTAL of Unitemized Independent Expend GI TOTAL Independent Expenditures.	tures		8120.90	
Under penalty of perjuny I certify that the indecences herein were not made in cooperation, consultation, co equest or suppostion of any candidate or any authorizar of such cancidate or authorized committee. Furtherm And not consultant to the committee.	t expenditures reported ncert with, or at the ed committee or agent		sworn to before me	this can st
did not involve the financing of dissemination, distribi in whose or in part of any campaign materials preparet campaign committee, or their agent		My Commuser	**************************************	
Span	Core		NC**	MAY PUBLIC

C,

#### ITEMIZED DISBURSEMENTS

Page 12 of 4 to LINE NUMBER 19 to each caregory of the Detailed Surveys Page 19

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee. National Conservative Political Action Committee A. Futt Name, Mailing Address and ZIP Code Purpose of Disbursement Diversified Mailing Services Dete Imonth. Amount of Each Postage day, year) Disbursement This Period Disbursement for: © Primary © General 5/9/80 \$19000.00 O Other (specify): B. Full Name, Mailing Address and ZP Code American Mailing List Corp Purpose of Disbursement Date (month, Amount of Each Mail List Rental 7777 Leesburg Pike Falls Church, VA 22043 Disbursament This Period day, year) Disbursement for: O Primary DiGeneral 5/9/80 600.00 Other (specify): C. Full Name, Mailing Address and ZIP Code
VA Unemployment Commission Purpose of Disbursement Date Imonth, Amount of Each Unemployment Tax Box 1358 day, year) Disbursement This Period Richmond, VA 23211 Disbursement for: © Primary © General 5/9/80 199.65 C Other (specify): D. Full Name, Marking Address and ZIP Code
VA Unemployment Commission Purpose of Disbursement Date (month, Amount of Each Penalty day, year) Disbursement This Period Disbursement for: © Primary © General 5/9/80 30.00 Other (specify): E. Full Name, Mailing Address and ZIP Code Purpose of Disbursement Prep, Inc. 2611 Shirlington Road Date (month, Amount of Each Printing day, year) Disbursement This Period Arlington, VA 22206 Disbursement for: © Primary © General 5/9/80 4595.56 Other (specify): F. Full Name, Mailing Address and ZIP Code Metro Printing & Mailing Purpose of Disbursement Date Imonth. Amount of Each Printing Box 262 Disbursement This Perio day, year) Sterling, VA 22170 Disbursement for: SPrimary SGeneral 5/9/80 1687.00 D Other (specify): G. Full Name, Mailing Address and ZIP Code Berlin & Jones Co., Inc. Purpose of Disbursement Date Imonth, Amount of Each Printing P. O. Box 4294 day, year) Disbursement This Period New York, NY 10049 Disbursement for: SPrimary SGeneral 5/9/80 2784.36 □ Other (specify): H. Full Name, Mailing Address and ZIP Code Purpose of Disbursement Diversified Direct, Inc. Date (month. Amount of Each Printing c/o U.V.B. Box 179 day, year) Disbursemen; This Period Alexandria, VA 22314 5/9/80 2539.95 Disbursement for: @Primary @General C Other (specify): 1. Full Name, Mailing Address and ZIP Code Purpose of Dispursement Medi America, Inc. Date Imonin. Amount of Each 1900 N. Beaugegard Street #12 Temporary Help day, yearl Disbursement This Period Alexandria, VA 22311 Dispursement for: EPriman EGeneral 5/14/80 4565.00 = Other (specify) RUBTOTAL of Dispursements This Page (optional) 36 001.52 TCTAL This Period fight days this line number only?

o°

### ITEMIZED DISBURSEMENTS

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

Purpose of Disbursement	Dese Imonth	Amount of Each
Postage	day, year)	Disbursament This Perio
Disburgement for: G Premov C General	5/16/80	\$17162.00
1 Purpose of District		
Mailing Services	Date (month, day, year)	Amount of Each Disbursamen: This Penic
0.000		CHECK STREET, I his Peno
Other (specify):	5/16/80	7219.29
Purpose of Disbursament	Date Imonth.	Amount of Each
Computer See Main	1	Disbursament This Perio
Computer Svc, Mail Fee	5/16/80	7823.03
CONTRACTOR OF THE PARTY OF GROOM	]	1
Computer Service		Amount of Each
	day, year)	Disbursement This Period
Other (specify):	5/16/80	18081.60
Purpose of Disbursement	Date (month	1
Mail List Rental		Amount of Each
		Disbursement This Period
Other (specify)	5/16/80	<b>379</b> .79
Purpose of Disbursemen:	Date (most)	1
Printing	day, year)	Amount of Each Disbursement This Period
Disbursement for: OPrimary OGeneral  O Other (specify)	5/16/80	5631.68
Purpose of Disbursement		
		Amount of Each
	day, year)	Dispursement This Pariod
Disbursement for: 3 Primary 5 General 5 Other (specify):	5/16/80	2391.72
Purpose of Disbursement	Date (month	
Printing	,	Amount of East
	OEY, 4887)	Disbursement This Period
C Other (specify)	5/16/80	2652.91
Purpose of Dispursement	Date (mone)	
Printing		Amount of Each Disbursement This Period
Corner (specify)		760.03
		1.0
		62,102.05
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SCHEDULE D (Revised 3/80)

# DESTS AND OBLIGATIONS Excluding Loans

The factor of th

National Conservative Political Action Committee	Overlanding Belance Sepinning This Period	Amount Insurred This Period	Poyment This Poyned	Outstanding Relense at Close of This Person
Metro Printing & Mailing 1200 Sterling Boulevard Sterling, VA 22170	11,157.84	1,472.33		6,265.33
Neture of Dubt (Purpose): Printing Service: Accts Payable				19. C. S. S. S.
8. Full Name, Mailing Address and Zio Code of Debtor or Creditor Mt. Vernon Publishing Co., Inc. 810 N. Fairfax Street Alexandria, VA 22314	2,696.51	2,407.10	1,508.83	3,594.78
Nature of Debt (Purpose): Printing Service: Accts Payable				135/27
C. Full Name, Mailing Address and Zio Code of Debtor or Creditor Prep, Inc. 2611 Shirlington Road Arlington, VA 22206	27,692.31	19,389.77	15,962.23	31,119.85
Nature of Dept (Purpose): Printing/Typesetting: Accts Paya	ble -			
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor Response Graphics P. O. Box 92608-T Cleveland, OH 44190	5,484.13	-0-	2,000. <b>0</b> 0	3,484.13
Nature of Debt (Purpose): Supplies/Printing-Accts Payable		3. N. S. S.	4.1	
E. Full Name, Mailing Address and Zio Code of Dibbor or Creditor Richard A. Viguerie Co. 7777 Leesburg Pike Falls Church, VA 22043				3 113,586
Nutrum of Debt (Purbows): Computer-list renta & mailing fees-Accts Payable	2 mg 1 mg 1 mg 1 mg 1 mg 1 mg 1 mg 1 mg		· M	
F. Full Name, Mailing Address and Zin Code of Debtor or Creditor Wiland & Associates 219 East Davis Culpeper, VA 22701		18,707.32	-0-	18,903.74
Natural of Debt (Purpose). Computer & Mail Handling Service-Accts Payable				
1) \$USTOTALS This Period This Page (optional)				176,953.6
2) TOTAL This Period Elest page this line only)				•

#### ITEMIZED DISBURSEMENTS

Page 12 of 14 to LINE NUMBER 10 or sech conserved the Detailed

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

Name of Committee (in Full)

National Conservative Political Action Committee

A. Full Name, Mailing Address and ZIP Code Diversified Mailing Services	Purpose of Disbursement Postage	Dese (month, day, year)	Amount of Each Disbursement This Period
S. Full Name, Mailing Address and ZIP Code	Disbursement for: © Primary © General © Other (specify):	5/9/80	\$19000.00
American Mailing List Corp 7777 Leesburg Pike Falls Church, VA 22043	Purpose of Disbursement Mail List Rental	Date (month, day, year)	Amount of Each Disbursament This Period
C. Full Name, Mailing Address and ZIP Code	Disbursement for: O Primary O General O Other (specify):	5/9/80	600.00
VA Unemployment Commission Box 1358 Richmond, VA 23211	Purpose of Disbursement Unemployment Tax	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name Mailing Address of TOO	Disbursement for: © Primary © General © Other (specify):	5/9/80	199.65
VA Unemployment Commission	Purpose of Disbursement Penalty	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Disbursement for: © Primary © General © Other (specify):	5/9/80	30.00
2611 Shirlington Road	Purpose of Disbursement Printing	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐Primary ☐General ☐ Other (specify):	5/9/80	4595.56
F. Full Name, Meiling Address and ZP Code Metro Printing & Mailing Box 262 Sterling, VA 22170	Purpose of Disbursement Printing	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: © Primary □ General □ Other (specify):	5/9/80	1687.00
G. Full Name, Mailing Address and ZIP Code Berlin & Jones Co., Inc. P. O. Box 4294 New York, NY 10049	Purpose of Dispursement Printing	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: DiPrimary DiGeneral Di Other (specify):	5/9/80	2784.36
H. Full Name, Mailing Address and ZIP Code Diversified Direct, Inc. c/o U.V.B. Box 179	Pumpse of Disbursement Printing	Date (month, day, year)	Amount of Each Disbursement This Period
Alexandria, VA 22314  Full Name, Mailing Address and ZIP Code	Disbursement for: © Primary © General Disbursement for: © Primary © General	5/9/80	2539.95
Medi America, Inc. 1900 N. Beaugegard Street #12 Alexandria, VA 22311	Purpose of Dispursement Temporary Help	Date (month, day, year)	Amount of Each Disbursement This Period
	Dispursement for: @Primary @General @ Other (specify)	5/1//00	4565.00

## ITEMIZED DISBURSEMENTS

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

National Conservative Political Action Committee

A. Full Name, Mailing Address and ZP Code Metro Printing & Mailing 120 S. Sterling Boulevard Sperling, VA 22170	Purpose of Disbursement Printing	Date (month, day, year)	Amount of Each Disbursement This Perio
B. Full Name, Mailing Address and ZIP Code	Disbursement for: © Primary © General © Other (specify):	5/2/80	\$2134.92
Diversified Mailing Service 7777 Leesburg Pike Falls Church, VA 22043	Purpose of Disbursement Mailing Services  Disbursement for: © Primary © General	Date (month, day, year) 5/2/80	Amount of Each Disbursement This Period 6500,00
C. Full Name, Mailing Address and ZIP Code	Other (specify):	<b>.</b>	
Color Graphics Inc. 1801 Underwood Boulevard Delran, NJ 08075	Purpose of Disbursment Printing	Dete (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Disbursement for: © Primary © General © Other (specify):	5/2/80	715.00
Berlin & Jones Co., Inc. 2 East Union Avenue	Purpose of Disbursement Printing	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Disbursement for: ©Primary ©General © Other (specify):	5/2/80	2005.58
H. G. Smithy Property Co 811 15th Street NW	Purpose of Disbursament Rent	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Disbursement for: □Primery □General □ Other (specify):	5/2/80	2810.25
H. G. Smithy Property Co.	Purpose of Disbursement Rent	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Dispursement for: □Primary □ General □ Other (specify):	5/2/80	300.00
U. S. Postmaster Ben Franklin Station Washington, DC 20044	Purpose of Dispursement Postage	Date (month, day, year)	Amount of Each Disbursement This Perio:
	Dispursement for: DPrimary DGeneral D Other (specify):	5/6/80	2500.00
First American Bank of VA 1501 Wilson Boulevard ARlington, VA 22209	Purpose of Disbursement Payroll Deposit	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: DiPrimary = General = 0 Other (specify):	5/7/80	1942.98
Diversified Mailing Service 7777 Leesburg Pike Falls Church, VA 22043	Computer Services & Mailing Services		Amount of Earn Disbursement This Perica
	Disbursement for: EPrimary EGeneral . E Other (specify)	5/9/80	6653.85
SUBTOTAL of Dispursements This Page (posional)			

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#### ITEMIZED DISBURSEMENTS

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

National	Conservative	Political	Action	Committee	
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A. Full Name, Mailing Address and ZP Code Composition Systems, Inc. 1011 Arlington Boulevard	Purpose of Disbursament Type Setting	Dete (month, day, year)	Amount of Each Disbursement This Pe
Arlington, VA 22209	Disbursement for: © Primary © General © Other (specify):	5/16/80	\$ 273.52
8. Full Name, Mailing Address and ZP Code American Mailing List Corp	Mail List Rental	Dete (month, day, year)	Amount of Each Disbursament This Pa
	Disbursement for: © Primary © General © Other (specify):	5/21/80	33.41
C. Full Name: Mailing Address and ZIP Code Hedi America, Inc.	Printing, Mail Serv.	Date (month, day, year)	Amount of Each Disbursement This Pa
	Disbursement for: © Primary © General © Other (specify):	5/23/80	1810.71
D. Full Name, Mailing Address and ZIP Code Bryan Wirwicz	Purpose of Disbursement Payroll	Date (month, day, year)	Amount of Each Disbursement This Pa
	Disbursement for: ©Primary ©General © Other (specify):	5/23/80	64.99
E. Full Name, Mailing Address and ZIP Code Bryan Wirwicz	Purpose of Disbursement Postage & Travel Reimbursement Disbursement for: Dirimery Dispursement of Other Isoecily)	Date (month, day, year) 5/23/80	Amount of Each Disbursement This Pe 7.96
F. Full Name, Mailing Address and ZIP Code Diversified Mailing Sevice	Purpose of Disbursament Mailing Service & Computer Expense Disbursament for: © Primary □ General □ Other (specify):	Date (month, day, year) 5/23/80	Amount of Each Disbursament This Pe 1437 . 04
G. Full Name, Mailing Address and ZP Code Metro Printing & Mailing Ser. Box 262 Sterling, VA 22170	Purpose of Dispursement Printing	Date (month, day, year)	Amount of Each Disbursement This P
	Disbursement for: DPrimary DGeneral D Other (specify):	5/23/80	489.50
H. Full Name, Mailing Address and ZIP Code The C&P Telephone Co. P. O. Box 27272 Richmand VA 22272	Purces of Disbur <del>sment</del> Telephone Expenses	Date (month, day, year)	Amount of Each Disbursement This Pe
Richmond, VA 23272	Disbursement for Sprimary Sceneral Cother (specify)	5/23/80	1307.62
The Richard A. Viguerie Co.	Purpose of Dispursement Mail Fee	Date (month, day, year)	Amount of Each Disbursement This Per
	Disbursement for: @Primary @General: @Other Ispecify):	5/23/80	1435.92
SUSTOTAL of Dispursements This Page (aptionul)			101 = 15
TOTAL This Period first dugs this line number only \$			6.000.6

#### JULY MONTHLY

Vendor	Payments This Period (Schedule D)	Payments Reported Expenditure Schedules (Schedule B and E)
Prep, Inc.	21,028	11,803
Diversified Direct, Inc	. 17,704	16,653
Berlin & Jones, Inc.	6,563	5,000
Response Graphics	3,484	2,483

SCHEDULE D (Revised 3/80)

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# DEBTS AND OBLIGATIONS Excluding Loans

Page 2 of 2 ter
LINE NUMBER 9
(Use separate Schedules
for each numbered line)

Name of Committee (in Full)  National Conservative Political  Action Committee	Outstanding Belence Seginning This Period	Amount Incurred This Period	Payment This Payled	Outstanding Balance at Close of This Period
A. Full Name, Mailing Address and Zip Code of Deptor or Creditor	1			<b>V. 11111/0122</b>
Mt. Vernon Publishing Co. 810 N. Fairfax Street Alexandria, VA 22314	3,594.78	1,300.00	2,341.58	2,553.20
Neture of Duct (Purpose): Printing Services : Accts. Payable		1 1 Carrier 1	4.040.	e
8. Full Name, Mailing Address and Zip Code of Debtor or Creditor	A SECOND CONTRACT		****	
Pren, Inc. 2611 Shirlington Road Arlington, VA 22206	31,119.85	10,602.39	21,028.94	20,693.30
Neture of Dep: (Purpose):			• 1.4.5	
-Typing/Typesetting : Accts. Payable	3.5		1, 44,34	
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor Resmonse Graphics P.O. Box 92608-T Cleveland, Ohio 44190	3,484.13	-0-	3,484.13	-0-
Nature of Dect (Purpose): Printing: Accounts Payable				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Richard A. Viguerie Co., Inc. 7777 Leesburg Pike Falls Church, VA 22043	113,586.84	31,962.91	85,313.17	60,236.58
Name of Debt (Purpose): Mail Fees and Mail List Rental : Accounts Payable				14.6%×
E. Full Name, Mailing Address and Zio Code of Debtor or Creditor Wiland & Associates 219 East Davis Street Culpeper, VA 22701	18,903.74	-0-	8,851.09	10,052.65
Nature of Dept (Purpose): Conputer Services : Accounts Payable				
F. Full Name, Mailing Address and Zip.Code of Debtor or Creditor				
Nature of Debt (Purpose):				İ
1) SUBTOTALS This Period This Page (optional)				
2) TOTAL This Period (last page this line only)				140,973.05
3) TOTAL OUTST MIDING LOANS from Schedule C flast page of				
TOTAL OUTST WIDING EDANS from Schedule C lists page of     ADD 21 and 31 and carry forward to appropriate time of Summi				<del></del>

SCHEDULE B

#### ITEMIZED DISBURSEMENTS

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Any information coined from such Resorts and Sestemans may not be said or used by any person for the purpose of soliciting constitutions or for commercial purposes, other than using the name and accross of any policical committee to spicer constitutions from such committee.

Tame of Committee in Full:

\*\*Mational Conservative Political Action Committee\*\*

A. Full Name, Malling Address and 23P Code Purpose of Debursament Door Impart, Amount of Each

V. Am county comment on the con-	THE PERSON OF CHAPTER AND ADDRESS OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF THE PERSON OF T	Deer smarrin,	Amount of tool
First American Bank 1501 Wilson Blvd.	Payroll Tax Deposit	day, year)	Dispursement This Period
Arlington, Va. 22209	Disbursament for: © Primary = General  © Other (specify):	6/4/80	1,978.62
B. Full Hame, Malling Address and ZP Code	Purpose of Disbursement	Date Imorrah,	Amount of Each
Candice Taw 7401 Grace	Reimbursment Office Supplies Disturbursk for: Officery General	day, yearl	Disbursament This Penad
Springfield, Va. 22158	© Other tapecity):	- 6/6/80	10.40
C., Full Name, Malling Address and ZIP Code	Purpose of Disbursement	Date Impacts	Amount of Each
The Richard A. Viguerie 7777 Leesburg Pike	CO. Mail List Rental	day, yearl	Disbursoment This Parised
Falls Church, Va. 22043	Disbursement for: © Primary © General © Other (specify):	6/6/80	7,000.00
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Dece tracerets,	Amount of Each
Diversified Mailing Services	Postage	day, year)	Disbursoment This Period
	Disbursament for: Sprimery Sceneral  Other (specify):	6/6/80	15,600.00
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Dow Imanel,	Amount of Each
Diversified Mailing Services	Mailing Services	<b>697, 700-1</b>	Dissursement This Pened
	Disbursement for: 3 Primary 3 General 3 Other Ispecify 1:	6/6/80	1,900.00
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date importh,	Amount of Each
Prep, Inc. 2611 Shirlington Road	Printing 7	day, year)	Dispursement This Period
Arlington, Va. 22206	Disbursement for: © Primary © General © Other (specify):	6/6/80	2,123.04
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Dets Imonth.	Amount of Each
Tri-State Envelope Corp. 6900 Faigle Road	Printing & Supplies	day, year)	Disbursement This Period
Beltsville, Nd. 20705	Disbursement for: "Different Dispursement for: "Different Dispursement for Different Dispursement for Dispur	6/6/80	
H. Full Name, Mailing Address and ZIP Code	Purpose of Dispursement	Date Imonth,	Amount of Each
IBM Corporation	Deposit for Purchase of Typewritter	dey, year)	Disbursement The Penad
	Disbursement for: © Primary © General © Other (specify):	6/11/8	0 164.25
1. Full Name, Mailing Address and ZIP Code	Purpose of Discurrement	: Dete Imonth,	Amount of Each
Susan S. Hannegan	Reimbursment-Office Supplies	day, year)	Disbursement This Period
8506 Inyo Court Alexandria, Va. 22309	Disbursement for: Differency Eldensess  2 Other (specify):	6/11/8	0 7.93

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#### ITEMIZED INDEPENDENT EXPENDITURES

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Nume of Commission for Publi		10.	D. No.	
National Conservative Poli			C0002468	7 107 10 10
Figs Taylor, Making Adaptes & ZP Code of Sont Payer 	Perpendi Experience	Care umanen. day, yeart	Amquet	Name of Federal Candidate supported or addressed by the expendence & office sought
Composition Systems, Inc.	Typesetting	6/6/80	14.53	HcGovern U.S. Senate SD
				Charact Conserv
Composition Systems, Inc.	Typesetting	6/6/80	14.53	Bayh U.S. Senate IN
			ļ	C Sessors C Coccue
Composition Systems, Inc.	Typesetting	6/6/80	14.52	Cranston U.S. Senate
·				CA Support SE Occore
Composition Systems, Inc.	Typesetting	6/6/80	14.52	Culver U.S. Senate Iowa
Composition Systems, Inc.	Typesetting	6/6/80	14.52	Church U.S. Senate Idaho
Prep Inc. 2611 Shirlington Road Arlington, Va. 22206	Printing	6/6/80	17.80	Cranston U.S. Senate CA
				Succort 20 Oucone
(a) SUBTOTAL of Itemated Independent Expendits (b) SUBTOTAL of Unitermited Independent Expend			90.42	-!
(c) TOTAL Incorreduct Extends tures				. j s
Under penalty of persury it certify that the independenter were not made in cooperation, consultation, consultation, consultation are necessary or support or of any conducted any authority such candidate as any authority such candidate as authority of such candidate as authority of such candidate.	oncert with, or at the zed committee or agent fore, these expenditures	Subscribed a	nd swarn to before r	
did not invalve the financing of dissemination, distrib in whole or in part of any campaign materials prepare campaign committee or their agent.		Wy Comma	-00 6±0-40	

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#### ITEMIZED INDEPENDENT EXPENDITURES

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Name of Commissio Bin Full)		1.0	. 100.	
National Conservative Pol		comittee	C0002468	
Fuji Rayma, Maining Appress & 27F Code of Both Poves	Perpan of Expendence	Disse Integrals, day, years	Ampunt	Nume of Fotorial Cardinate supported or exposure by the empendence & office sought
Prep, Inc.	Printing	6/6/80	17.80	Culver U.S. Senate Iowa
Prep, Inc.	Printing	6/6/80	17.80	Church U.S. Senate Idaho
Prep, Inc.	Printing	6/6/80	17.80	Bayh U.S. Senate IN
Prep, Inc.	Printing	6/6/80	17.80	McGovern U.S. Senate S.D.
Hetro Printing	Printing	6/6/80	317.05	McGovern U.S. Senate S.D.
Metro Printing	Printing	6/6/80	317.05	Bayh U.S. Senate IN
(a) SUBTOTAL of framined increament Expend (b) SUBTOTAL of Uniterrated Independent Expe			705.30	
(c) TOTAL Incorporate Expenditures				18

Under penarty of perjury 8 certify that the independent expenditures reported neren were not made in cooperation, consultation, concert with, or at the request or support on 6 any candidate or any authorized committee or agent of sum candidate or authorized committee. Furthermore, these expenditures did not incover the ringe negot committee. Furthermore, these expenditures did not incover or new ringer and of suspensiation, distribution, or republication in whice or in part of any campagn materials prepared by the candidate, his campaign atoministice or their agent.

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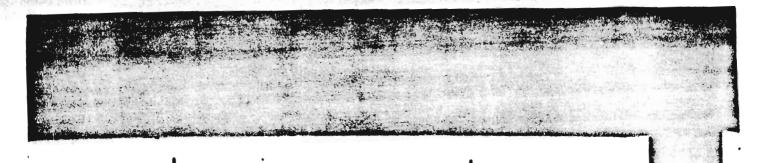
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A CONTRACTOR OF THE PARTY OF TH THE RESERVE OF THE PARTY OF THE PROPERTY OF THE PA ~<u>B</u>\_43~ al Conservative Political Action Counittee CHEROLET - -Printing 125.30 1,199.78 I.S. Senate Prop. Inc. Printing 1/29/30 1,199.77 Cra C.S. Senate Prop. lec. Printing 6/20/00 1,199.77 Charch J.S. Senate -3 Cream Branch Prop. Inc. 1,199.77 HcGovern C.S. Senate Printing 6/23/80 Orman Saula Prep. Inc. 1,199.77 Rayle U.S. Senate Printing 6/20/80 Indiana C. Tri-State Envelope Corp. Printing 6/29/80 2,800.00 Reagan President 6900 Faigle Book Seltsville, M. 20785 - Second of second contract for some \$ 778 Fb. entitle of incoming recommer Econo to MRCHI, Printersiere Schreichen A STATE OF THE ET LIGHT POPPER TO BE THE STREET OF THE STRE STATE OF THE STATE A Suppose to Suppose the suppose to Suppose the suppose to Suppose to Suppose the suppose to Suppose the suppose to Suppose to Suppose the suppose the suppose to Suppose the su K-wash.



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#### ITEMIZED INDEPENDENT EXPENDITURES

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Ryses of Commission In Pulls		1.0	100		
Mational Conservative Pol	litical Action	Committee	C00024687		
Figs Rooms, Marking Asserts & 20° Class of Book Players	Ampino al Espanyamo	Sass Interest. day, years	Amount	Rame of Fodors Canadas supported or appealed by the expendence & other sought	
Prep, Inc.	Printing	6/27/80	3,300.00	Reagan President	
				Esecon Comm	
Metro Printing & Mailing Services	Printing	6/27/80	303.00	Cranston U.S. Senate CA	
Metro Printing & Mailing Services	Printing	6/27/80	303.00	Church U.S. Senate Idaho	
Metro Printing & Mailing Services	Printing	6/27/80	303.00	Culver U.S. Senate Iowa	
Metro Printing & Mailing Services	Printing	6/27/80	303.00	McGovern U.S. Senate SD	
Metro Printing & Mailing Services	Printing	6/27/80	303.01	Bayh U.S. Senate IN	
Tel SUSTOTAL of Isomized Independent Expending			*4.812.01	C) Support OfOcoper	
(c) TOTAL Independent Expenditures		• •	•	15	
Under penalty of persons it persons that the independent expenditures reported herein were not made in cooperation consultation, concert with or at the request or suggestion of any candidate or any authorized committee or agent of such candidate or any authorized committee or agent of such candidates or any authorized committee Futnermore these expenditures and not involved the financing of distribution, or republication or republication or report of any candidate or appropriate properties prepared by the candidate.  **Moreover or part of any candidate or appropriate part of any candidate or appropriate properties prepared by the candidate.					
herein were not made in cooperation, consultation, request or suggest on of any candidate or any autro- of such conditions or autrorized committee. Further did not nevolve the timbering of 3 seemination, distribution of other timbering of 3 seemination, distribution.	concert with or at the rized committee or agent more, these expenditures (bution) or republication	Subscribed and	. 19	70 1744 CDv 38	

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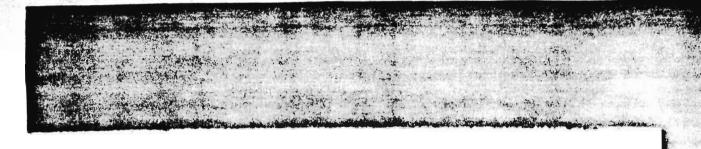
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SCHEDULE D (Revised 3/80)

# DEBTS AND OBLIGATIONS Excluding Loans

LINE NUMBER 10
(Use separate Schedules for each numbered intell

Name of Committee (in Full) National Conservative Political	Outstanding Balance Beginning	Amount Incurred	Payment This	Outstanding Belance at Class
Action Committee	This Period	This Period	Period	of This Ported
A Full Name, Meiling Address and Zip Code of Debtor or Creditor American Mailing List 7777 Leesburg Pike Falls Church, VA 22043	929.96	-0-	705.13	224.83
Nature of Debt (Purpose):  Mail List Rental : Accounts Payable		*	10 May 20 - 20	$\lambda = h$
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor Berlin & Jones Co., Inc. P.O. Box 4294 New York, N.Y. 10049	10,949.38	10,856.95	6,563.00	15,243.33
Nature of Debt (Purpose): Printing Services : Accounts Payable			•	
C. Full Name, Melling Address and Zip Code of Debtor or Creditor Diversified Direct, Inc. 2936 Prosperity Avenue Fairfax , Virginia 22031	27,935.55	-0-	17,704.16	10,231.39
Nature of Debt (Purpose): Printing Services: Accounts Payable			7 - 4	- 1
D. Full Name, Mailing Address and Zio Code of Debtor or Creditor Diversified Mailing Services 7777 Leesburg Pike Falls Church, VA 22043	42,366.58	3,094.62	25,195.76	20,265.4
Nature of Debt (Purpose): Mailing Services : Accounts Payable		4.30		
E. Full Name, Mailing Address and Zio Code of Debtor or Creditor MediAmerica, Inc. 1900 N. Beauregard Street #12 Alexandria, VA 22311	3,081.06	-0-	3,081.06	
Nature of Debt (Purpose). Production Services: Accts. Payable				
F. Full Name, Mailing Address and Zin Code of Debtor or Creditor Metro Printing & Mailing 1200 Sterling Blvd. Sterling, VA 22170	6,264.33	-0-	4,792.00	1,472.3
Nature of Debt (Purcom): Printing Services: Accts. Payable		Ì		
1) SUBTOTALS This Period This Page (optional)				
2) TOTAL This Period (last page this line only)				
3) TOTAL OUTSTANDING LOANS from Schedule C Last page of	miy)		<b>. .</b>	<del>†</del>
4) ACO 21 and 3) and carry forward to appropriate line of Summ	an Programme	11		1



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#### ITEMIZED INDEPENDENT EXPENDITURES

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Nume of Commission in Publi			). No.	
Mational Conservative Poli			C00024687	
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Mt. Vernon Publishing	Printing	6/6/80	85.96	Cranston U.S. Senate CA
				Charact Consess
Mt. Vernon Publishing	Printing	6/6/80	85.96	Culver U.S. Senate Iowa
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Mt. Vernon Publishing	Printing	6/6/80	85.96	Church U.S. Senate Idaho
				Support Oppose
Diversified Direct, Inc. U.V.B. Box #179 Alexandria, Va. 22314	Printing	6/6/80	1,600.00	Reagan President
				∑ Success ☐ Occord
Berlin & Jones C., Inc. 2 East Union Ave. East Rutherford, N. J.	Printing	6/6/80	1,000,00	Reagan President
•				\$ \$-000** C CO0004
Composition Systems 1011 Arlington Blvd Suite # W 141	Typesetting	6/6/80	52.42	Reagan President
Arlington, Va. 22209		1		M Succoort C Oucone
(a) SUBTOTAL of Immitted Independent Expendity	eres		\$ 2,910,30	
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IET TOTAL Independent Expenditures				1 5
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#### ITEMIZED INCOMPENDENT EXPENDITURES

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Name of Operations in Publish					10.		
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Hetro Printing		Printing		6/13/8	31	7.05	Cranston U.S. Senate CA
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Metro Printing		Printing		6/13/8	31	7.05	Church U.S. Senate Idaho
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Diversified Direc	t	Printing		6/13/8	7,	528.24	Reagan President
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Medi America, Inc		Temporary Printing	Help	6/13/8	80 72	25.60	McGovern U.S. Senate SD
Medi America, Inc		Temporary Printing	Help	6/13/	80 67	73.46	Bayh U.S. Senate IN
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(c) TOTAL Independent Exerne s	<b>~6</b>						is
Under penalty of payany I contriby the home ware not made in cooperation request or suggest on oil any candida of such conditions are arrived as did not invited by finding of pass.	i, consultation concert de or any authorised of imittee. Furthermore, i phination distribut on	outh, or at the production or agent rhese extenditures , or reductives on		Secreta	I and smarr	13 before m	t Prince Ch y
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recolor assess from such Reserve and Biscomors; may not be sold or used by any person for the purpose of solicising sent lid purposes, other shan using the name and address of any policisal assessions to solicit contributions from each committee me of Commisses to Full National Conservative Political Action Committee A. Full Home, Multing Address and ZIP Code Person of Distances Sedam & Herge Date (married -Legal Services 7600 Old Springhouse Road 44. Yes McLean, Virginia 22102 ent for: Officery DGen Other (specify): 6/19/80 1,824.82 B. Full Home, Making Address and ZIP Code Post of Delaware Amount of Each Mail List Rental American Mailing List Comp. day, years Disbursament for: Officery O'General D Other (specify): 6/20/80 C. Fell Home, Mailing Address and ZIP Code 90.78 Purpose of Dist Composition Systems, Inc. Date (manufi Amount of Earth Typesetting 1011 Arlington Blvd . **شع**ر, بح<del>د</del>أ Arlington, VA 22209 Distursement for: Offinery O'General C Other (specify): 6/20/80 D. Fed Home, Making Address and ZIP Code 380.22 Purpose of Disburses Diversified Mail Marketing Care (month Amount of Each Computer & Mail Services day, year) Disbursament for: Offinery OGeneral 6/20/80 2,143.21 Other (specify): E. Full Home, Mailing Address and ZIP Code Purpose of Disbu Diversified Mail Marketing Does (month Amount of Each Postage day, year) Disbursement for: Offrinary O'General 6/20/80 20,468.00 Other (specify): F. Pull Home, Mailing Address and ZIP Code **Purpose of Disburse** Date (month, Richard A. Viguerie Co., Inc. Computer Serv., Mail Fee Amount of Each COY, YOU') and Mail List Rental Disbursament This Pe Disbursement for: @Primary C General O Other (specify): 6/20/80 8,478.19 G. Full Name, Mailing Address and ZIP Code Purpose of Disbursement Date Imonth, Diversified Direct, Inc. Amount of Each day, year) Printing Disbursoment This Pe Disbursement for: GPrimary GGeneral 6/20/80 C Other (specify): 1,610.10 H. Full Name, Mailing Address and ZIP Code Purpose of Disbursement Date Imonth. Mt. Vernon Publishing Amount of Each Printing day, year) 810 North Fairfax Street Debursoment The Period Disburgement for: @Primary @General Alexandria, VA 22314 D Other (specify): 6/20/80 1. Full Name, Mailing Address and ZIP Code 454.74 Purpose of Disbursement Date Imports. Batching & Caging and Computer Service Amount of Each Wiland & Associates, Inc. dev vest 219 East Davis Street PROPERTY THE PE Disbursament for: EPismary EGeneral Culpener, VA 6/20/80 5,449.54 = Other (specify) SUSTOTAL of Dispursements This Page (sessional) TOTAL This Ported floor book thing time manager entry) 40 899 LC

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#### ITEMIZED INDEPENDENT EXPENDITURES

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lational Conservative Poli	tical Action C	ommittee	C0002468	7
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Richard A. Viguerie Co.	Computer Services	6/20/80	137.84	Culver U.S. Senate Iowa
				Character & Connect
Richard A. Viguerie Go.	Computer Services	6/20/80	137.84	Bayh U.S. Senate IN
				☐ Secon
Diversified Direct, Inc.	Printing	6/20/80	543.70	McGovern U.S. Senate SD
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Diversified Direct, Inc.	Printing	6/20/80	543.70	Bayh U.S. Senate IN
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Diversified Direct, Inc.	<b>Printing</b>	6/20/80	543.70	Church U.S. Senate ID
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Diversified Direct, Inc.	Printing	6/20/80	543.70	Culver U.S. Senate Iowa
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Under penalty of perjuly is certify that the independent expenditures repaired nerves were not made in properation consultation, concert with or at me required in supplies on a law condicate or any author led committee or agent of such candidate or any author the conditional committee. Furthermore, these expenditures did not involve their nancine of dissamination distribution, or republication in whore or in dark or any compagn materials prepared by the band open, we cambaign committee or mely agent.

Subscribed and swern to before me this \_\_\_\_\_ Chr. of

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Diversified Direct, Inc.	Printing	6/20/80	543.69	Cranston U.S. Senate CA
·				G 3-000- 2 Crosse
Diversified Direct, Inc.	Printing	6/20/80	1,125.77	Reagan President
				@ Seeson
Medi America, Inc.	Printing	6/20/80	176.30	Culver U.S. Senate Iowa
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Medi America, Inc.	Printing	6/20/80	176.30	Cranston U.S. Senate CA
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Medi America, Inc.	Printing	6/20/80	17 <b>5</b> . 36	Church U.S. Senate Idaho
				C Suppose G Troops
Medi America, Inc.	Printing	6/20/80	72.04	Bayh U.S. Senate IN
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tal SUSTOTAL of Isamized independent Expends			\$ 2269.46	el .
to SUBTOTAL of Unitemized Independent Expenses  (e) TOTAL Independent Expenditures	chrures .		•	1.

Under density of derjuny if certify that the independent expenditures reperted renew were not made in cooperation, densitiation, concert with or at the request or suggest on it and of the candidate or any author led committee or agent of such candidate or authorized committee. Furthermore, these expenditures did not involve the financing of distances on distribution, or republication will distribution or in order or any arrowing or any arrow of any partners or the financing of distribution of the candidate materials of the candidate.

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## ITEMIZED INDEPENDENT EXPENDITURES

Name of Commisses (in Publ)				
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Mt. Vernon Publishing	Printing	6/27/90	257.99	Mc Govern U.S. Senate
			1	C Second & Consess
Diversified Mailing Services	Mailing Services	6/27/80	5,354.69	Reagan . President
				1 Section 1 Concore
Diversified Direct, Inc.	Printing	6/27/80	3,200.00	Reagan President
				Success C Copose
Berlin & Jones Co., Inc.	Printing	6/27/80	1,000.00	Reagan President
				Support D Occord
MediAmerica, Inc.	Mailing Services and Production Cost	6/27/80	211.40	Church U.S. Senate
MediAmerica, Inc.	Mailing Services and Production Cost	6/27/80	211.40	Culver U.S. Senate IOWA
to account to the control of the CATOTBUE to the control of the co			\$10,235,4 \$	
Under behalty of perjuny i certify what the independent forein were not made in cooperation, consultation, con- request or suggest on of any candidate or any author at of such carbidate or authorized committee. Furthering designed involve the indepensable of statementation, distribu- ion whole or in part of any cambion material.	ncert with, or at the to committee or agent	Swoichbed an	d swarn to before n	

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# DEBTS AND OBLIGATIONS Excluding Loans

LINE NUMBER 10
(Use separate Schooling for each numbered line)

nme of Committee (in Full)  National Conservative Political	Outstanding Salance Beginning	Amount	Payment	Overtanding
Action Committee	This Period	Incurred This Period	This Paried	Balance at Class of This Paried
Full Name, Mailing Address and Zip Code of Debtor or Creditor	i			
American Mailing List				
7777 Leesburg Pike	929.96	-0-	705.13	224.83
Falls Church, VA 22043	1	1		
lature of Debt (Purposs):	N. LEWIS CA.			erio, ta 10
Mail List Rental : Accounts Payable	· * * * * * * * * * * * * * * * * * * *	7		
Full Name, Mailing Address and Zio Code of Debtor or Creditor				
Berlin & Jones Co., Inc.				
P.O. Box 4294	10,949.38	10,856.95	6,563.00	15,243.33
New York, N.Y. 10049				
Nature of Debt (Purpose):			7,3	
Printing Services : Accounts Payable			3,	· .
C. Full Name, Mailing Address and Zlp Code of Debtor or Creditor				1
Diversified Direct, Inc.				1
2936 Prosperity Avenue				
Fairfax , Virginia 22031	27,935.55	-0-	17,704.16	10,231.39
Nature of Debt (Purpose):				
Printing Services : Accounts Payable			•	15 (4)
D. Full Name, Mailing Address and Zio Code of Deptor or Creditor				
Diversified Mailing Services				1
7777 Leesburg Pike	42,366.58	3,094.62	25,195.76	20,265.44
Falls Church, VA 22043			,	
Neture of Debt (Purpose):		d to year	The Mark Control	4.0000000000000000000000000000000000000
Mailing Services : Accounts Payable		A 100 Com.	A2333	**************************************
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor				1
MediAmerica, Inc.	1			ĺ
1900 N. Beauregard Street #12	3,081.06	-0-	3,081.06	-0-
Alexandria, VA 22311				
Nature of Debt (Purpose):		2.5	!	1
Production Services : Accts. Payable				
F. Full Name, Mailing Address and Zio Code of Debtor or Creditor				
Metro Printing & Mailing				
1200 Sterling Blvd.	6,264.33	-0-	4,792.00	1,472.3
Sterling, VA 22170				
Nature of Debt (Purpose):	<del> </del>	<u> </u>	<del></del>	
Printing Services : Accts. Payable		<u> </u>		
1) SUSTOTALS This Period This Page (optional)			· · · · · · · · · · · · · · · · · · ·	
2) TOTAL This Period (last page this line only)				1
3) TOTAL OUTSTANDING LOANS from Schedule C liest page	only)			
4) ADD 21 and 31 and carry forward to appropriate line of Summ				

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#### ITEMIZED INDEPENDENT EXPENDITURES

Page 20\_ or 43 Page

National Conservative Pol:	itical Action Co	mittee	C0002468	7
Full Name, Mailing Address & ZIP Code of Each Payes	Purpose of Expensiture	Cate impeto, day, year)	Amount	Name of Federal Candidati supported or opposed by the expenditure & office sought
Mt. Vernon Publishing	Printing	6/6/80	85.96	Cranston U.S. Senate CA
				□ Success G_Coccess
Mt. Vernon Publishing	Printing	6/6/80	85.96	Culver U.S. Senate Iowa
				C Support COppose
Mt. Vernon Publishing	Printing	6/6/80	85.96	Church U.S. Senate Idaho
				□ Sucport   © Oppose
Diversified Direct, Inc. U.V.B. Box #179 Alexandria, Va. 22314	Printing	6/6/80	1,600.00	Reagan President
				Support Oppose
Berlin & Jones C., Inc. 2 East Union Ave. East Rutherford, N. J.	Printing	6/6/80	1,000,00	Reagan President
•				Support Copese
Composition Systems 1Cll Arlington Blvd Suite # W 141	Typesetting	6/6/80	52.42	Reagan Presiden
Arlington, Va. 22209	Ì			Support Dupose
er SUBTOTAL of Itemized independent Expenditu Bi SUBTOTAL of Unitemized Independent Expend			2.910.30	
ic: TOTAL Independent Expenditures				\$
inder Denainy of Derjury I certify that the independer erein were not made in cooperation (consultation, co pouest of suggest on of any candidate or any authorial I such candidate or authorized committee. Furtherm is not involve the financing of dissemination distribu-	incert with, or at the ted committee or agent lore, these expenditures		sworn to before me	t thisuas of

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Signature

#### ITEMIZED INDEPENDENT EXFENDITURES

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Name of Commisses (in Full)		1.3	No	
ational Conservative Poli	tical Action Co	ommittee	C00024687	7
Fun home, Noving Accress & ZIP Code of East Payor	Person of Expensions	Sass (month) day, year)	Amoun:	Name of Federal Car didate supported or apposed by the expenditure & office sought
Berlin & Jones Co., Inc.	Printing	6/13/80	1,000.00	Reagan President
				C Success
Metro Printing & Mailing Services, Inc.	Printing	6/20/80	240.00	McGovern U.S. Senate SD
				☐ Support ☐ Dopore
Metro Printing & Mailing Services, Inc.	Printing	6/20/80	240.00	Church U.S. Senate Idaho
Metro Printing & Mailing Services, Inc.	Printing	6/20/80	240.00	Culver U.S. Senate Iowa
				□ Succes
Metro Printing & Mailing Scrvices, Inc.	Printing	6/20/80	240.00	Cranston U.S. Senate CA
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Metro Printing & Mailing Services, Inc.	Printing	6/20/80	240.00	Bayh U.S. Senate IN
		į		Support COupose
tal SUBTOTAL of Item-red independent Expendit	ur <b>e</b> s		: 2.200.0	>:
(b) \$UBTOTAL of Unitermized Independent Expend (c) TOTAL Independent Expenditures	ditures.		\$	·
Under denains of derjuny is certify that the indecende never were not made in cooperation consultation, corquest or suggestion of any candidate or any authority suggestion of any candidate or any authority flowing candidate or authorities.	oncerr with or at the zed or ministee or agent		2 1400r n 10 before #	
did not involve the tinancing of dissemination idiatric in whole or in pair of any compagent materials dispersion of articles and an expension of a campaign materials dispersion of their agent.	bution or redubilization	We Commiss o	on exp./m	
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## ITEMIZED INDEPENDENT EXPENDITURES

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Name of Committee (in Full)			   D No	
National Conservative Poli	tical Action Com		C0002468	7!
Full Name, Making Address & ZIF Code	Purpose of	Date (month		
of Each Poyee	Expenditure	Gay, year)	Amount	nume of Federal Candidate supported or opposed by the expenditure & office sought
Berlin & Jones Co.	Printing	6/20/80	2,000.00	Reagan President
				S Support C Coppose
Diversified Mail Marketing	Mailing Servic	6/20/80	956.26	McGovern U.S. Senate SD
				C Support C Coporte
Diversified Mail Harketing	Mailing Servic	6/20/80	956.26	Church U.S. Senate Idaho
				Support C Dapose
Diversified Mail Marketin	Mailing Servic	6/20/80	956.26	Culver U.S. Senate Iowa
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Diversified Mail Marketin	Mailing Servic	6/20/8	956.26	Cranston U.S. Senate CA
				Support Copose
Diversified Mail Marketing	Mailing Servic	e 6/20/8	956.26	Bayh U.S. Senate IN
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Tel SUBTOTAL of Itemized independent Expenditure b) SUBTOTAL of University of Independent Expenditures LCT TOTAL Independent Expenditures			s 6.781.30	***************************************
				\$
Under Denaity of Derluny Eizert fy that the independent feren were not made in cooperation consultation, con fedulest or supplest on of any candidate or any authorize of such candidate or authorized committee. Furthermo aid not involve the financing of cistemination, distribut in whose or in particle any cambaign materials prepared fembalay committee, or their agent.	Cert with lor at the discommittee or agent these expend tures	Subschoed and	1 Swarn to before me	oav of
S. gnarure	Care		NC T	2-2-5-5

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#### ITEMIZED INDEPENDENT EXPENDITURES

Page 36 or 43 Page

(Sas Roverss Side for Instructions)

National Conservative Po	litical Action Commi		C0002468	ל
Fusi hame, Valuing Appress & 21F Cook of Easth Poves	Persons of Expenses	Sale imerini Gav. ytari	Arrows:	Name of Federal Gandidate supported or apposed by the expenditure & office sought
Mt. Vermon Publishing	Printing	6/27/80	257.99	Mc Covern U.S. Senate
				Support & Capone
Diversified Mailing Services	Mailing Services	6/27/80	5,354.69	Reagan . President
				<b>№ 5-000011</b> □ 000010
Diversified Direct, Inc.	Printing	6/27/80	3,200.00	Reagan President
				Succon C Capacie
Berlin & Jones Co., Inc.	Printing	6/27/80	1,000.00	Reagan President
				Š Suocerr □ Occore
MediAmerica, Inc.	Mailing Services and Production Cost	6/27/80	211.40	Church U.S. Senate
MediAmerica, Inc.	Mailing Services and Production Cost	6/27/80	211.40	Culver U.S. Senate IOWa
(a) SUBTOTAL or comized independent Expendit			s 10, 235.48	}
(b) SUBTOTAL of Unitermized Independent Expendict TOTAL Independent Expenditures	ditures		\$	\$
Under demaity of der uny licertify that the indecende heren were not made in coderation consultation corequestion suggestion or any candidate or any authorized committee. Further did not involve the financing or dissemination, districtly whose or in part or any campaign materials drepart campaign committee. Or their agent.	ondern with libr at the lized committee or eyent hore ithese expenditures button or redublication		19	£ 15:5
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## DEBTS AND OBLIGATIONS Excluding Loans

Page 2 of 2 for LINE NUMBER 9 (Use soperate Schedules for each numbered line)

Name of Committee (in Full) National Conservative Political	Outstanding	Amount	Payment	Outstanding
Action Committee	Balance Beginning This Period	Incurred This Period	This Paried	Belance at Close of This Period
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor	1	7	7 0 0 0	<b>67 17.07 67.00</b>
Mt. Vermon Publishing Co. 810 N. Fairfax Street Alexandria, VA 22314	3,594.78	1,300.00	2,341.58	2,553.20
Nature of Dect (Purpose): Printing Services: Accts. Payable			en en en indication de en antique de proces	
8. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Prep, Inc. 2611 Shirlington Road Arlington, VA 22206	31,119.85	10,602.39	21,028.94	20,693.30
Recurs of Dep: (Purpose):				
Typing/Typesetting : Accts. Payable		* , , , , , , ,	lia.	3 3 3 5 7 5
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor Response Graphics P.O. Box 92608-T Cleveland, Ohio 44190	3,484.13	-0-	3,484.13	-0-
Auturn of Door (Purpose): Printing: Accounts Payable				
D. Full Name, Mailing Address and Zip Code of Deptor or Creditor				
Richard A. Viguerie Co., Inc. 7777 Leesburg Pike Falls Church, VA 22043	113,586.84	31,962.91	85,313.17	60,236.58
Neture of Debt (Purpose): Mail Fees and		1384807		14.17 × 15.00
Mail List Rental : Accounts Payable		Story Come Story and Same	Sales Sales	Alexander at
E. Full Name. Mailing Address and Zio Code of Debtor or Creditor Wiland & Associates 219 East Davis Street Culpecer, VA 22701	18,903.74	-0-	8,851.09	10,052.65
Nature of Debt (Purpose): Conputer Services : Accounts Payable				
F. Full Name, Mailing Address and Zip.Code of Debtor or Creditor				
Nature of Debt (Purpose):				
1) SUBTOTALS This Period This Page (optional)				
2) TOTAL This Period (lest page this line only)				140,973.05
3) TOTAL OUTST MIDING LOANS from Schedule C flest page of	miy)			
4) ADD 2) and 3) and carry forward to appropriate line of Summa	ary Page liast page on	ıly)		· •

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#### ITEMIZED INDEPENDENT EXPENDITURES

Page 19 01 43 Page

Name of Committee (in Full)		'	D No	
National Conservative Poli	tical Action C	ommitte	C0002468	7
Fuii Name, Mailing Address & ZIP Code of Each Payee	Purpose of Expenditure	Date (month), day, year)	Action;	Name of Federal Card (3). Supported or obposed by the expenditure & office sought
Metro Printing & Mailing Services	Printing	6/6/80	98.35	Cranston U.S. Senate CA
				☐ Support ☐ Oppose
Metro Printing & Mailing Services	Printing	6/6/80	98.35	Culver U.S. Senate Iowa
				□ Support S Oppose
Metro Printing & Mailing Services	Printing	6/6/80	98.35	Bayh U.S. Senate IN
			<u></u>	Succore COppose
Response Graphics P.O. Box 92608 - T Cleveland, Ohio 44190	Printing	6/6/80	1,328.94	Kennedy President
,		1	1	Support CX Oppose
Mt. Vernon Publishing 310 N. Fairfax Street Alexandria, Va. 22314	Printing	6/6/80	85.95	McGovern U.S. Senate SD
				Support X Copose
Mt. Vernon Publishing	Printing	6/6/80	85.95	Bayh U.S. Senate
				Support Q-Dupose
(a) SUBTOTAL of Itemized independent Ex enditu	res		\$1.795.89	
(B) SUBTOTAL of Unitemized Independen L 2	htur <b>e</b> s .		\$	•
(c) TOTAL Independent Expenditures				\$
Under penalty of perjury I certify that the indecender neven were not made in cooperation, consultation, co request or suggestion of any candidate or any authorities such candidate or authorities furtherm	oncert with, or at the sted committee or agent		d swarn to before m	e thisday of
did not involve the financing of dissemination idistrib in whole or in part of any campaign materials prepare campaign committee or their agent.	ution, or republication	Nty Commissio		_
	2.00		VC.	ARY PUBLIC

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#### ITEMIZED INDEPENDENT EXPENDITURES

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<u> </u>			١			
Name of Commisses (in Full)			10 No			
National Conservative Poli	tical Action Com	nittee	COO	02468	7	
Fusi Name, Maiting Address & ZIP Code of Each Payon	Persons of Expensions	Date (month) day, year)	Amo	- North	Name of Foseral C supported or oppose expenditure & offi-	ed by the
Medi America, Inc.	Printing	6/13/80	0	. 94	Church U.S. Sena	te
					C Support (	Оросне
esponse Graphics	Printing	6/13/8	0 1,1	155.19	Kennedy President	
					Support (	000000
The Richard A. Viquerie Co.	Computer Services & Direct Mail	6/13/8	0 2,	617.95	Kennedy President	
	Fees				Support (	XC20016
The Richar A. Viquerie Co.	Computer Serv- ices & Direct Mail	6/13/8	37	6.02	Church U.S. Sena Idaho	te
	Fees				Support 5	<b>D000018</b>
The Richard A. Viquerie Co.	Computer Services & Direct Mail	6/13/8	30 37	6.02	Cranston U.S. Sena CA	ite
	Fees				Support 1	Copose
The Richard A. Viquerie Co.	Computer Services & Direct Mail	6/13/8	30 37	6.92	Culver U.S. Sena Iowa	ate
	Services				Support .	Cocce
fai SUBTOTAL of Itemized independent Expenditu	ires .		s 4.	102.14		
(b) SUBTOTAL of Unitermized Independent Expend (c) TOTAL Independent Expenditures	htures		s		i s	
Under penalty of persury I certify that the independent herein were not made in cooperation, consultation, co request or suggest on of any candidate or any authorize of such candidate or authorized committee. Furtherm	incerr with or at the ted committee or agent ore, these expenditures	Subscribed		ta setore m 19		:av 01
did not involve their nancing of dissemination, distribi in whole or in part of any campaign materials preparet campaign committee, or their agent.		My Comm.	15:00 ##Dir	n		
S-chature	Date			75	TARY PLBLIC	

ATTACHMENT #13

#### NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE --- "ITEMIZED COMPIBUTIONS REPORTING PROBLEM"

Report	Total Contributions	Itemized Contributions
September Monthly 1979(8-1-79 to 8-31-79)	216,692	900
September Monthly Amendment - Filed 8-27-80	216,919	68,504
October Monthly 1979(9-1-79 to 9-30-79)	260,195	850
October Monthly Amendment - Filed 8-15-80	262,435	36,859
November Monthly 1979(10-1-79 to 10-31-79)	259,440	56,372
November Monthly Amendment - Filed 8-15-80	263,698	52,942
December Monthly 1979(11-1-79 to 11-30-79)	288,093	0
December Monthly Amendment - Filed 8-26-80	297,954	43,449
Year End Report 1979(12-1-79 to 12-31-79)	270,050	0
Year End Amendment - Filed 8-15-80	270,050	74,511
February Monthly 1980(1-1-80 to 1-31-80)	263,568	0
February Monthly Amendment - Filed 8-15-80	263,568	49,192
March Monthly 1980(2-1-80 to 2-29-80)	375,689	0
March Monthly Amendment - Filed 8-15-80	<b>375</b> ,639	45,157
April Monthly 1980(3-1-80 to 3-31-80)	309,488	0
April Monthly Amendment - Filed 8-25-89	309,488	41,415
May Monthly 1980(4-1-80 to 4-30-80)	271,399	0
May Monthly Amendment - Filed 8-25-80	271,399	64,305
June Monthly 1980(5-1-80 to 5-31-80)	375,907	0
June Monthly Amendment - Filed 8-25-80	375,907	51,525
July Monthly 1980(6-1-80 to 6-30-80)	407,062	0
July Monthly Amendment - Filed 8-25-80	407,062	54,178
August Monthly 1980(7-1-80 to 7-31-80) NO AMENIMENT FILED YET RFAI PREPARED	472,977	0
Totals:	3,297,589	523,965

523,965 (not previously itemized)

ATTACHMENT #14

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#### FEDERAL ELECTION COMMISSION

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WASHINGTON, D.C. 20463

Susan S. Hannegan, Treasurer National Conservative Political Action Committee 1500 Wilson Blvd. Suite 513 Arlington, VA 22209

Identification No: C00024687

Reference: August Monthly Report (7-1-80 to 7-31-80)

Dear Ms. Hannegan:

This letter is prompted by the Commission's preliminary review of your August Monthly Report. The review raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act. An itemization of these areas follows:

-The amount on the Detailed Summary Page, Line 11(a), Column A, contributions from individuals/persons other than political committees, is \$472,977. If this figure includes any contributions from individuals which exceed \$200 or \$200 in the aggregate for the calendar year, you are advised that a Schedule A should be provided including the proper identification of each person pursuant to 11 CFR 100.12.

An amendment, if necessary, to your original report correcting the above problems should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,

Mark Kleinman Reports Analyst Reports Analysis Division ATTACHMENT #15



#### FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 3, 1980

Ms. Becki C. Burlingame, Treasurer National Conservative Political Action Committee 1500 Wilson Boulevard, Suite #513 Arlington, Virginia 22209

Dear Ms. Burlingame:

Enclosed for your information is a copy of the final audit report of the National Conservative Political Action Committee which was approved by the Commission on March 3, 1980.

In accordance with Commission policy, a copy of the report will be released to the public five days after your receipt of this letter. Should you have any questions regarding the public release of your audit report, please contact Mr. Fred Eiland of the Commission's Press Office at (202) 523-4065. Any questions you may yet have related to matters covered during the audit or in the audit report should be directed to Mr. Rick Halter of the Audit Division at (202) 523-4155.

Sincerely,

Robert &. Costa

Assistant Staff Director for the Audit Division

Enclosure as stated

CERTIFIED MAIL: RETURN RECEIPT REQUESTED



#### FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

# REPORT OF THE AUDIT DIVISION ON THE NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE

#### Background

#### A. Overview

This report is based on an audit of the National Conservative Political Action Committee ("the Committee"), undertaken by the Audit Division of the Federal Election Commission in accordance with the Commission's audit policy to determine whether there has been compliance with the provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). The audit was conducted pursuant to Section 438(a)(8) of Title 2 of the United States Code which directs the Commission to make from time to time audits and field investigations with respect to reports and statements filed under the provisions of the Act.

The Committee registered with the Office of the Secretary of the Senate and the Office of the Clerk, U.S. House of Representatives on March 27, 1975. The Committee maintains its headquarters in Arlington, Virginia.

The audit covered the period from March 27, 1975 through August 31, 1977, the final coverage date of the most recent report filed by the Committee at the time of the audit. The Committee reported a beginning cash balance of \$-0-, total receipts for the period of \$4,021,112.34, total expenditures for the period of \$4,010,618.27 and a closing cash balance on August 31, 1977 of \$10,638.74. 1/

This audit report is based on documents and working papers which support each of the factual statements. They form part of the record upon which the Commission based its decisions on the matters in the report and were available to Commissioners and appropriate staff for review.

Ending cash-on-hand is misstated by \$144.67 due to an arithmetical error.

#### B. Key Personnel

The principal officers of the Committee during the period audited were Mr. Charles R. Black, Jr., Chairman and Mr. Roger J. Stone, Jr., Treasurer.

#### C. Scope

The audit included such tests as verification of total reported receipts and expenditures and individual transactions; review of required supporting documentation and analysis of Committee debts and obligations; and such other audit procedures as deemed necessary under the circumstances.

#### II. Findings and Recommendations

#### A. Reporting Individual Contributor Information

Section 434(b)(2) of Title 2, United States Code requires that the occupation and principal place of business, if any, of each person who has made one or more contributions within the calendar year in an aggregate amount or value in excess of \$100 be disclosed on reports filed with the Commission.

Section 102.9(e) of the Commission's Regularitis states, in relevant part, that when Committee treasurers and candidates show that best efforts have been used to obtain and submit the information required, they shall be deemed to be in compliance.

Our review of contributor records and FEC disclosure reports revealed that the occupation and/exprincipal place of business was not reported as follows:

I	umber of temized ontributions	Number of Itemized Contributions Without Required Information	% of Itemized Contributions Without Required Information
3/27/75-12/31/ 1/1/76-12/31/7 1/1/77-8/31/77	6 1747	134 809 415	79.3% 46.3% 57.6%
Total for Peri Audited: 3/27/ 8/31/77		1358	51.52%

NCPAC made an attempt to obtain the required contributor information for the period 3/27/75-8/31/77. These efforts culminated with the filing of amendments. The first amendment, filed in July, 1977, contained the occupation and principal place of business for 72 contributions received from 1/1/77 thru 6/30/77. The second amendment, filed in May, 1978, contained the occupation and principal place of business of 731 contributions received from July 1, 1977 thru January 31, 1978.

#### Recommendation

In our opinion, NCPAC has made best efforts to obtain and submit the information required, and therefore, the Audit staff recommends no further action.

#### B. Reporting of Loans and Guarantors

Section 434(b)(5) of Title 2, United States Code requires the disclosure of each loan to or from any person within the calendar year in an aggregate amount or value in excess of \$100.00, together with the full names and addresses (occupations and the principal places of business, if any) of the lender, endorser, and guarantors, if any, and the date and amount of such loans.

Our review of NCPAC records revealed two (2) loans which were reported inaccurately with respect to guarantors. In the first case, five (5) guarantors of \$2,000.00 each (\$10,000) were identified by NCPAC. Our examination disclosed that eleven guarantors for \$910.00 each (\$10,010.00) should have been reported. It was noted that the principal amount of the loan was \$10,000, and the date of the loan was August 6, 1975. The second loan, reported as being received on June 9, 1977, the amount of \$20,000.00 was guaranteed by four (4) individuals. These four (4) individuals were not disclosed on reports filed by NCPAC.

These matters were brought to the attention of Committee personnel at the conclusion of the audit fieldwork. They agreed to file the necessary amendments to correct these irregularities.

On November 5, 1979, an amendment substantially correcting the public record was filed by the Committee.

#### Recommendation

The Audit staff recommends that no further action be taken since the appropriate amendments were filed with the Commission.

#### C. Reporting of Debts and Obligations

Section 104.8(a) and (b) of Title 11, Code of Federal Regulations states, in part, that debts and obligations which remain outstanding after the election shall be continuously reported until extinguished. A debt, obligation, or other promise to make an expenditure of \$500.00 or less, shall be reported as of the time payment is made, or no later than 60 days after occurrence, whichever comes first. A loan of money in the ordinary course of business and any debt or obligation over \$500.00 shall be reported as of the time of the transaction.

Our examination of NCPAC documents and disclosure reports, and a comparison thereof revealed that NCPAC had been improperly reporting debts and obligations during the period April 1, 1975 through March 31, 1977.

Our tests indicated that the liquidation of debts and obligations was not properly disclosed on Schedule C. However, it was noted that the reported debts and obligations were reported as having been paid as evidenced by entries in expenditure schedules on subsequent reports.

Since testing has given assurance that all reported debts and obligations were liquidated, no amending action is believed to be necessary on an item by item basis. However, we recommended that NCPAC submit a statement for the public record, signed by the Treasurer, indicating that all reported debts and obligations have been liquidated as of a given reporting date and that commencing with the May 10, 1977 report, debts and obligations will be reported as required by the Act. This statement was received on November 5, 1979.

#### Recommendation

The Audit staff recommends no further action on this matter.



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## FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR # 1294

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## FEDERAL ELECTION COMMISSION

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

THE FOLLOWING MATERIAL IS BEING ADDED TO THE PUBLIC FILE OF CLOSED MUR 1294.



#### FEDERAL ELECTION COMMISSION

	Documentation pertou	ning lo	meilialion
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file pur	above-described material suant to the following exe of Information Act, 5 U.S.	emption pro	ovided in the
(1	) Classified Information	(6)	Personal privacy
(2	) Internal rules and practices	(7)	Investigatory files
(3	) Exempted by other statute	(8)	Banking Information
(4	) Trade secrets and commercial or financial information	(9)	Well Information (geographic or geophysical)
(5	) Internal Documents		~
	Signed	buer	y B. Kramer
	date		29/81

FEC 9-21-77





## FEDERAL ELECTION COMMISSION

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

END OF ADDITIONAL MATERIAL FOR CLOSED MUR 1294.

