



FEDERAL ELECTION COMMISSION  
WASHINGTON DC 20463

April 30, 1991

MEMORANDUM

TO: FRED S. EILAND  
PRESS OFFICER

FROM: *[Signature]* ROBERT J. COSTA  
ASSISTANT STAFF DIRECTOR  
AUDIT DIVISION

SUBJECT: PUBLIC ISSUANCE OF THE FINAL AUDIT REPORT ON THE DOLE  
FOR PRESIDENT COMMITTEE

Attached please find a copy of the Final Audit Report on the Dole for President Committee which was approved by the Commission on April 25, 1991.

Informational copies of the report have been received by all parties involved and the report may be released to the public.

Attachment as stated

cc: Office of General Counsel  
Office of Public Disclosure  
Reports Analysis Division  
FEC Library

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FEDERAL ELECTION COMMISSION

WASHINGTON, DC 20463

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REPORT OF THE AUDIT DIVISION  
ON THE  
DOLE FOR PRESIDENT COMMITTEE

I. Background

A. Overview

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This report is based on an audit of the Dole for President Committee ("the Committee") to determine whether there has been compliance with the provisions of the Federal Election Campaign Act of 1971, as amended ("the Act") and the Presidential Primary Matching Payment Account Act. The audit was conducted pursuant to 26 U.S.C. §9038(a) which states that "After each matching payment period, the Commission shall conduct a thorough examination and audit of the qualified campaign expenses of every candidate and his authorized committees who received payments under Section 9037."

In addition, 26 U.S.C. §9039(b) and 11 C.F.R. §9038.1(a)(2) state, in relevant part, that the Commission may conduct other examinations and audits from time to time as it deems necessary.

The Committee registered with the Federal Election Commission on March 13, 1987. The Committee's current mailing address is in McLean, Virginia.

The audit covered the period from the Committee's inception, February 1987, through April 30, 1988. In addition, certain other financial activity relating to the Committee's Statement of Net Outstanding Campaign Obligations was reviewed through September 12, 1988. Records relating to the Committee's state allocations were reviewed through March 1989.

The Committee reported an opening cash balance of \$-0- total receipts of \$26,856,123.99, total disbursements of \$26,336,211.41, and a closing cash balance of \$519,912.58 on April 30, 1988. Under 11 C.F.R. §9038.1(e)(4), additional audit work may be conducted and addenda to this report issued as necessary.

This report is based upon documents and workpapers 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.

B. Key Personnel

The treasurers of the Committee from its inception to the present are as follows:

Marynell D. Reece	Inception - 5/18/88
James L. Hagen	5/19/88 - 2/1/89
Scott E. Morgan	2/2/89 - 7/14/90
James L. Hagen	7/15/90 - Present

C. Scope

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

II. Audit Findings and Recommendations Related to Title 2 of the United States Code

A. Apparent In-Kind Corporate Contributions

Under Section 441b of Title 2 of the United States Code, it is unlawful for any corporation to make a contribution or expenditure in connection with any election at which presidential and vice presidential electors or a Senator or Representative in, or a Delegate or Resident Commissioner to, Congress are to be voted for, or in connection with any primary election or political convention or caucus held to select candidates for any of the forgoing offices, or for any candidate, political committee or other person knowingly to accept or receive any contribution prohibited by this section.

Section 100.7(A)(1)(iii) of Title 11 of the Code of Federal Regulations states that the term "contribution" includes a gift, subscription, loan, advance, or deposit of money or anything of value. The term "anything of value" includes all in-kind contributions. Unless specifically exempted under 11 C.F.R. §100.7(b), the provision of goods or services without charge or at a charge which is less than the usual and normal charge for such goods or services is a contribution.

1. Media Commissions

The Committee contracted with Multi Media Services Corporation (MMSC) to provide media placement services and they contracted with Ringe Media, Inc. (RMI) to provide media planning and production.

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In return for the performance of these services, the committee paid MMSC a commission equal to 4% of total gross billings for commercials placed. In addition, the Committee paid RMI a commission equal to 1.5% of gross billings for air time for commercials produced by RMI. Therefore, the Committee paid an overall commission of 5.5%.

In the Interim Audit Report, the Audit staff recommended that the Committee provide evidence which demonstrates that the 4% commission paid MMSC for media placement and the 1.5% commission paid to RMI for apparent production costs do not constitute the provision of services at less than the usual and normal charge and thus are in-kind contributions from MMSC and RMI. It was further noted that the Audit staff would review any information provided and make additional recommendations with regard to this matter.

In the Committee's response to the Interim Audit Report, the Committee Treasurer stated that they "...entered into arms-length negotiation with Multi Media and reached an agreement of four percent based on the expected amount of media purchases to be made by DFP\*/ during the campaign." The following statement was provided by the president of MMSC:

I hereby swear that to the best of my knowledge the fee charged the Dole for President Committee Inc., by my firm was competitively priced for the presumed magnitude of the expenditures. The fee was well within "market levels" based on the contractual arrangements my firm had at that time.

The Audit staff acknowledges that the trend in the advertising industry is toward a fee arrangement and accepts the representations made by the president of MMSC.

The Audit staff notes that for this analysis, the 1.5% paid to RMI for production costs was combined with the 4% commission paid to MMSC for placement fees in order to compare the overall commission to the more common situation where these services were provided by a single firm. It is our opinion that based on the industry trends and the statement made by the president of MMSC, the two firms involved were reasonably compensated.

Recommendation #1

The Audit staff recommends no further action with regard to this matter.

\* / DFP refers to the Dole for President Committee.

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## 2. Non-Salaried Staff Members Employed by Others

During the review of disbursements, the Audit staff noted six Committee staff persons who received no salary from the Committee\*/. However, materials contained in Committee files (business cards, letterhead, stationery, correspondence, etc.) indicates that these persons were employed by other organizations. No information was available to determine if these employees were receiving regular salary payments from their other employers while volunteering for the Committee, or if they were using vacation time.

If four non-Senate staff persons were receiving salaries from incorporated entities while in a non-vacation status, possible corporate contributions from their employers to the Committee may have occurred. If their regular employers were not incorporated, it appeared likely that excessive contributions had been received.

At the exit conference, the Committee was provided with a list of the six staff persons involved along with their employers, and were requested to provide information to the Audit staff regarding any outside salary received by these persons.

In the Interim Audit Report, the Audit staff recommended that the Committee take the following action:

- ° Provide evidence that the two staff persons apparently employed by Senator Dole's office were on the U.S. Senate payroll.
- ° Provide information regarding salaries received by the other four staff persons from other employers while performing volunteer services for the Committee. If one or more of these persons were being paid by their regular employers, evidence indicating whether regular vacation time was being charged. Otherwise, value determinations would be necessary as well as refunds to their regular employers.

In the Committee's response to the Interim Audit Report, the Committee Treasurer stated that a number of volunteers were employed while working for the Committee and that he suspects this is a common situation. He notes that they "...made it very clear that work done in behalf of DFP was to be done on an individual's own time, whether after normal hours or on vacation or other leave time."

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\*/ Two of these six staff persons were apparently employed by Senator Dole's U.S. Senate office.

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Included with the Committee's response are statements from four of the six Committee staff persons who received no salary from the Committee. One of these four was apparently employed by Senator Dole's U.S. Senate office. He adds that they were unable to locate the other two individuals listed.

Based on the documentation provided by the Committee, the Audit staff accepts the Committee's explanation.

Recommendation #2

The Audit staff recommends no further action with regard to this matter.

B. Disclosure of Contribution Reattributions

Sections 434(b)(3)(A) and (B) of Title 2 of the United States Code state that each report under this section shall disclose the identification of each person who makes a contribution to the reporting committee during the reporting period, whose contributions have an aggregate amount or value in excess of \$200 within the calendar year, together with the date and amount of any such contribution and each political committee which makes a contribution to the reporting committee during the reporting period, together with the date and amount of any such contribution.

Under 11 C.F.R. §104.8(d)(3), if an itemized contribution is reattributed by the contributor(s) in accordance with 11 C.F.R. §110.1(k), the treasurer shall report the reattribution in a memo entry on Schedule A of the report covering the reporting period in which the reattribution is received. The memo entry for each reattributed contribution shall be reported in the following manner:

(i) The first part of the memo entry shall disclose all of the information for the contribution as it was originally reported on Schedule A;

(ii) The second part of the memo entry shall disclose all of the information for the contribution as it was reattributed by the contributors, including the date on which the reattribution was received.

During the review of contributions, the Audit staff identified an apparent problem with the Committee's FEC disclosure reports. Contributions received by the Committee which were less than or equal to \$1,000 and for which a reattribution letter had been submitted to the Committee were not amended on the FEC reports, unless the letter was received in the same reporting period as the contribution.

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This situation was brought to the Committee's attention during the audit fieldwork and a comprehensive amendment was filed on November 18, 1988 which materially corrected this disclosure problem.

Recommendation #3

As in the Interim Audit Report, the Audit staff recommends no further action regarding the contribution reattribution disclosure problem discussed above.

C. Possible "Testing the Waters" Expenditures Made by the Dole for Senate Committee

Section 9034.4(a)(2) of Title 11 of the Code of Federal Regulations states that even though incurred prior to the date an individual becomes a candidate, payments made for the purpose of determining whether an individual should become a candidate, such as those incurred in conducting a poll, shall be considered qualified campaign expenses if the individual subsequently becomes a candidate and shall count against the candidate's limits under 2 U.S.C. 441a(b).

Section 100.8(b)(1) of Title 11 of the Code of Federal Regulations states, in part, that the term "expenditure" does not include payments made solely for the purpose of determining whether an individual should become a candidate. If the individual subsequently becomes a candidate, the payments made are subject to the reporting requirements of the Act. Such expenditures must be reported with the first report filed by the principal campaign committee of the candidate, regardless of the date the payments were made.

Section 100.7(a) of Title 11 of the Code of Federal Regulations states that a contribution includes a gift, subscription, loan, advance or deposit of money or anything of value by any person for the purpose of influencing any election for Federal office. The term "anything of value" includes in-kind contributions.

The Audit staff reviewed the disclosure reports filed with the Federal Election Commission by the 1986 Dole for Senate Committee (DFS) to determine if any of the disclosed activity appeared to relate to the Presidential campaign. A group of transactions were identified as possible testing-the-water expenses. A request for the records relating to these transactions was made by the Audit staff and again by the Commission. After both were refused, the requested records were subpoenaed by the Commission.

The Audit staff reviewed documentation related to 21 DFS disbursements paid between April 24, 1986 and December 18, 1986. Eighteen of these payments were to payees located in Michigan which were possibly related to the Michigan Caucus held

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in August 1986. The other three items were for newspaper subscriptions in Iowa and New Hampshire.

Based on our review of the documentation, the Audit staff noted that the 18 disbursements to Michigan payees appeared to be related to a Detroit fundraiser held on July 1, 1986. However, the documentation does not provide any information as to whether this event was for the candidate's Senate campaign or if it was possible "testing the waters" activity for his Presidential campaign. No solicitation materials related to this event were made available for our review. However, none of the contributions raised at the event appear to have been received by the Committee.

At the exit conference the Committee Treasurer stated that he had obtained affidavits from a 1986 DFS consultant attesting to the fact that this event was related to the candidate's Senate campaign. This consultant was later a Dole for President employee. No affidavits were provided to the Audit staff.

In the Interim Audit Report, it was recommended that the Committee provide the affidavits attesting to the fact that this event was related to the candidate's Senate campaign, and all relevant documents including copies of any solicitation materials associated with the event.

The Committee's response to this recommendation included a copy of an affidavit from Kirk Clinkenbeard which states that in 1986, Senator Dole was seeking reelection to the United States Senate from Kansas; that a fundraiser was held in Michigan on July 1, 1986; that the fundraiser was for the exclusive benefit of Dole for Senate Committee; and that no other committee received any of the funds from the fundraiser. The Committee also states that none of the requested solicitations were found.

The Audit staff notes that the fundraiser was held in Michigan rather than Kansas; that the event was held in the month preceding the Michigan election of precinct delegates, the first step in the selection of Republican National Convention delegates; that the Dole for Senate Committee had sufficient excess campaign funds to transfer \$1,150,000 to the Committee; and that Senator Dole received 71% of the vote in the 1986 general election.

The Commission determined that this activity was not related to testing the waters and therefore no further action is warranted.

Recommendation #4

Based on the Commission's determination, no further action is necessary with regard to this matter.

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D. Itemization of Contributions from Political Committees and Unregistered Organizations

Section 434(b)(3)(B) of Title 2 of the United States Code states that each report shall disclose the identification of each political committee which makes a contribution to the reporting committee during the reporting period, together with the date and amount of any such contribution.

The Committee's receipt records were reviewed to determine whether all contributions from political committees were itemized. The Audit staff determined that 35 contributions from 30 committees, totaling \$14,030.00, were not itemized as required. Twelve of these contributions, from 11 unregistered organizations, total \$2,235.00.

The Committee was provided a schedule of these items at the exit conference.

At the exit conference, the former Committee Treasurer stated that they had employed strict controls for the recording of contributions in excess of \$200 and that it was possible that some of the ones under \$200.01 could have been recorded under an individual's name (such as the treasurer of the PAC) and that these items may have been reported in the unitemized contributions total. He added that some of the contributions in excess of \$200 could have been itemized on the FEC reports under an individual's name.

The Audit staff notes that the explanations provided by these Committee officials are reasonable since our reconciliation of the Committee's bank accounts to their disclosure reports resulted in immaterial differences.

In the Interim Audit Report, the Audit staff recommended that the Committee file amended Schedules A-P to correct the itemization of contributions from political committees and unregistered organizations.

The Committee Treasurer states in his response to the Interim Audit Report that they agree that the Committee received 15 of the 35 contributions noted in the report, but that 8 of these items are "not political committees as defined in the Regulations and are below the \$200.01 itemization threshold." He further states that "if the Commission believes it appropriate, DFP will amend its reports to reflect these contributions." He adds that the remaining 7 contributions "should be reported and DFP will so amend its reports."

The Audit staff notes that 11 C.F.R. §104.3(a)(4)(ii) requires all committees to itemize the identification of each contributor and the aggregate year-to-date total for such contributor for all committees (including political committees and committees which do not qualify as political committees under the

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Act) which make contributions to the reporting committee during the reporting period, together with the date of receipt and amount of any such contribution.

The Committee's response further states that the Committee has no record of the other 20 of the 35 contributions noted in the report. The Treasurer again points out that one of these contributions "...falls under itemization threshold as it is not a 'political committee'." The Committee adds that for the 6 contributions (out of these 20) for which the auditors have check copies, they believe that "they may have been earmarked contributions itemized under the name of the actual contributor" and that "[f]or those which the auditors got their information from the E Index, DFP believes it either did not receive the contributions or that they were treated as earmarked." He concludes that "DFP is ready to amend its reports at the direction of the Commission."

The Committee's suggestion that some contributions may have been reported in the name of an individual reiterates comments made at the exit conference. Though the Committee has provided no additional information in the response to the Interim Audit Report, the following is noted.

Of 35 contributions noted in the Interim Audit Report, 6 totaling \$680.00 appear to have been earmarked and are deleted from the finding. Six contributions totaling \$700.00 are recorded in the Committee's contribution data base in the name of an individual but are not itemized on Committee disclosure reports. All but one of these is \$200 or less. Seven contributions are both recorded in the name of an individual and itemized on the Committee's reports under the recorded name. These seven contributions total \$3,350.00.

An additional seven items are found recorded in the Committee's contribution data base under the contributing committee's name but are not found itemized on Committee disclosure reports. Only two of these contributions are in excess of \$200.00. These total \$1,785.00. The remaining 9 contributions totaling \$7,515.00 were taken from the contributing Committees' reports and no further information is available concerning these contributions. The Audit staff has not deleted these items given the apparent problems that the Committee had with the recording of contributions from political and other committees in the name of individuals.

In summary, the Committee has apparently received 29 contributions totaling \$13,350.00 from political and other committees which are not itemized or are incorrectly itemized. The Audit staff acknowledges that some portion of these may have been earmarked contributions for which no evidence of the earmarking is available.

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The Committee's response to the Interim Audit Report did not include amended Schedules A-P to correct the itemization problem noted above. Due to the immaterial total of these omissions, the Commission determined that no further action is warranted.

Recommendation #5

Based on the Commission's determination, no further action is necessary with regard to this matter.

E. Dole for President Delegate Committees

The Audit staff identified eighteen delegate committees apparently formed to support Senator Dole's campaign. Fifteen of these committees were located in Illinois and three in Maryland. Senator Dole authorized thirteen of these delegate committees on amendments to his Statement of Candidacy. Four of the five non-authorized delegate committees filed Statements of Organization with the Federal Election Commission and listed the Committee as an affiliate.

1. Prohibited Contributions (Delegate Committees)

Under Section 441b of Title 2 of the United States Code, it is unlawful for any corporation to make a contribution or expenditure in connection with any election at which presidential and vice presidential electors or a Senator or Representative in, or Delegate or Resident Commissioner to, Congress are to be voted for, or in connection with any primary election or political convention or caucus held to select candidates for any of the forgoing offices, or for any candidate, political committee or other person knowingly to accept or receive any contribution prohibited by this section.

Section 103.3(b)(1) of Title 11 of the Code of Federal Regulations states that, contributions that present genuine questions as to whether they were made by corporations may be, within ten days of the Treasurer's receipt, either deposited into a campaign depository or returned to the contributor. If any such contribution is deposited, the Treasurer shall make his or her best efforts to determine the legality of the contribution. If the contribution cannot be determined to be legal, the Treasurer shall, within thirty days of the Treasurer's receipt of the contribution, refund the contribution to the contributor.

Section 103.3(b)(4) states that any contribution which appears to be illegal and which is deposited into a campaign depository shall not be used for any disbursements by the political committee until the contribution has been determined to be legal. The political committee must either establish a separate account in a campaign depository for such contributions or maintain sufficient funds to make all such refunds.

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Based on our review of the available delegate committee records, the Audit staff identified 14 contributions from corporations, totaling \$1,350, which were not refunded or not refunded in a timely manner.\*/ These contributions were made to the Sixth Congressional District Delegate Dole Committee (Illinois), Dole for President 17th District Committee (Illinois), and the 20th Congressional District Dole Delegates Committee (Illinois).

This matter was not noted in the Interim Audit Report because the records used to make this determination had not yet been obtained for our review. Due to the immaterial total of these items, the Commission determined that no further action is warranted.

Recommendation #6

Based on the Commission's determination, no further action is necessary with regard to this matter.

2. Apparent Excessive Contributions (Delegate Committees)

Section 441a(a)(1)(A) of Title 2 of the United States Code states that no person shall make contributions to any candidate with respect to any election for Federal office which, in the aggregate, exceed \$1,000.00.

Section 110.1(k) of Title 11 of the Code of Federal Regulations states, in part, that any contribution made by more than one person, except for a contribution made by a partnership, shall include the signature of each contributor on the check, money order, or other negotiable instrument or in a separate writing. A contribution made by more than one person that does not indicate the amount to be attributed to each contributor shall be attributed equally to each contributor. If a contribution to a candidate on its face or when aggregated with other contributions from the same contributor exceeds the limitations on contributions, the Treasurer may ask the contributor whether the contribution was intended to be a joint contribution by more than one person. A contribution shall be considered to be reattributed to another contributor if the treasurer of the recipient political committee asks the contributor whether the contribution is intended to be a joint contribution by more than one person, and informs the contributor that he or she may request the return of the excessive portion of the contribution if it is not intended to be a joint contribution; and within sixty days from the date of

\*/ Section 103.3(b) of the Code of Federal Regulations was amended effective April 8, 1987. However, it is the opinion of the Audit staff that the contribution refunds were not made within a reasonable time as required by the previous regulation.

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the treasurer's receipt of the contribution, the contributors provide the treasurer with a written reattribution of the contribution, which is signed by each contributor, and which indicates the amount to be attributed to each contributor if equal attribution is not intended.

Section 103.3(b)(3) of Title 11 of the Code of Federal Regulations states, in part, that contributions which exceed the contribution limitation may be deposited into a campaign depository. If any such contributions are deposited, the treasurer may request redesignation or reattribution of the contribution by the contributor in accordance with 11 C.F.R. § 110.1(b), 110.1(k) or 110.2(b), as appropriate. If a redesignation or reattribution is not obtained, the treasurer shall, within 60 days of the treasurer's receipt of the contribution, refund the contribution to the contributor.

Section 103.3(b)(4) of Title 11 of the Code of Federal Regulations states, in part, that any contribution which appears to be illegal and which is deposited into a campaign depository shall not be used for any disbursements by the political committee until the contribution has been determined to be legal. The political committee must either establish a separate account in a campaign depository for such contributions or maintain sufficient funds to make such refunds.

Section 441a(f) of Title 2 of the United States Code states that no candidate or political committee shall knowingly accept any contribution in violation of any limitation on contributions.

Section 110.3(a) states that for the purposes of the contribution limitations, all contributions made or received by more than one affiliated committee, regardless of whether they are political committees, shall be considered to be made or received by a single political committee.

As noted above, the Interim Audit Report recommended that the Committee provide the records for the delegate committees which are affiliated with the Dole for President Committee. At the same time, requests were sent by the Commission directly to the delegate committees and subpoenas for records were sent to the delegate committees' banks. The records obtained from these requests and subpoenas were reviewed to determine if any contributions in excess of the limitations had been received.

It was determined that one individual had made an excessive contribution to the Delegates for Dole - 8th Congressional District-Illinois in the amount of \$150.00 and that two individuals had made excessive contributions to the Sixth Congressional District Delegate Dole Committee (Illinois) when

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their contributions to the Delegate Committee were aggregated with their contributions to the Dole for President Committee. The excessive portion of these two contributions totals \$1,040.00.

Since the delegate committee records were not obtained or reviewed prior to the completion of the Interim Audit Report, this matter was not addressed in the Interim Audit Report. Due to the immaterial total of these items, the Commission determined that no further action is warranted.

Recommendation #7

Based on the Commission's determination, no further action is necessary with regard to this matter.

F. Matters Referred to the Office of General Counsel

Other matters noted during the audit have been referred to the Commission's Office of General Counsel.

III. Findings and Recommendations Related to Title 26 of the United States Code

A. Calculation of Repayment Ratio

Section 9038(b)(2)(A) of Title 26 of the United States Code states that if the Commission determines that any amount of any payment made to a candidate from the matching payment account was used for any purpose other than to defray the qualified campaign expenses with respect to which such payment was made, it shall notify such candidate of the amount so used, and the candidate shall pay to the Secretary an amount equal to such amount.

Section 9038.2(b)(2)(iii) of Title 11 of the Code of Federal Regulations states, in part, that the amount of any repayment sought under this section shall bear the same ratio to the total amount determined to have been used for non-qualified campaign expenses as the amount of matching funds certified to the candidate bears to the total amount of deposits of contributions and matching funds, as of the candidate's date of ineligibility.

The formula and appropriate calculation with respect to the committee's receipt activity is as follows:

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Total Matching Funds Certified through the  
Date of Ineligibility - 3/29/88

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Numerator plus Private Contributions Received  
through 3/29/88

\$6,604,354.65

= .278907

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\$6,604,354.65 + \$17,075,095.59

Thus, the repayment ratio for non-qualified campaign expenses is 27.8907 percent.

B. Determination of Net Outstanding Campaign Obligations

Section 9034.5(a) of Title 11 of the Code of Federal Regulations requires that within 15 calendar days of the candidate's date of ineligibility, the candidate shall submit a statement of net outstanding campaign obligations which contains, among other items, the total of all outstanding obligations for qualified campaign expenses and an estimate of necessary winding down costs.

In addition, 11 C.F.R. §9034.1(b) states, in part, that if on the date of ineligibility a candidate has net outstanding obligations as defined under 11 C.F.R. §9034.5, that candidate may continue to receive matching payments provided that on the date of payment there are remaining net outstanding campaign obligations.

The Statement of Net Outstanding Campaign Obligations (NOCO) is the basis for determining further matching fund entitlement. Senator Dole's date of ineligibility was March 29, 1988. Consequently, he may only receive matching fund payments to the extent that he has net outstanding campaign obligations as defined in 11 C.F.R. §9034.5.

The Committee filed a NOCO statement which reflected the Committee's financial activity at March 29, 1988 and filed revised NOCO statements with each subsequent matching funds request. The Audit staff analyzed the Committee's September 12, 1988 NOCO, which accompanied their final matching funds request, and made adjustments to the NOCO by reviewing the Committee's financial activity as of that date. A review of the Committee's financial records through February 28, 1989 and the Committee's disclosure reports through December 31, 1990 was performed to adjust the NOCO figures. The Committee's NOCO as adjusted by the Audit staff appears below:

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Dole for President  
Statement of Net Outstanding Campaign Obligations  
as of September 12, 1988 a/

ASSETS

Cash in Banks	\$115,972.78
Accounts Receivable	178,868.43 <u>b/</u>
Capital Assets	<u>4,500.00</u>

TOTAL ASSETS

\$299,341.21

LIABILITIES

Accounts Payable for Qualified Campaign Expenses as of 9/12/88	155,262.17 <u>c/</u>
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Contribution Refunds:	
Paid between 9/13/88- 12/31/90	\$ 5,900.00 <u>d/</u>
Due for Excessive Contributions:	
Inds/Pol. Comtes	13,975.00
Campaign America	42,247.24 <u>e/</u>
Due for Prohibited Contributions	<u>60,842.38</u>

Total Contribution Refunds	122,964.62
Payments for Non-Qualified Campaign Expenses 3/30/88- 9/12/88	(33,582.65) <u>f/</u>

Winding Down Costs	
Salaries/Consulting	40,222.44 <u>c/</u>
Admin and Finance	51,466.22 <u>c/g/</u>

Additional Winding Down Costs Noted Subsequent to Interim Audit Report	63,308.27 <u>h/</u>
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Estimated Winding Down Costs (as of 12/31/90)	<u>11,305.75</u> <u>h/</u>
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Total Winding Down Costs	166,302.68
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Checks Voided Subsequent to Interim Audit Report	(42,854.20) <u>h/</u>
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TOTAL LIABILITIES

368,092.62

Net Outstanding Campaign Obligations

\$ (68,751.42)

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Notes to September 12, 1988  
Statement of Net Outstanding Campaign Obligations

- 23 / 11 / 64 / 20
- a/ All figures shown were determined as of 9/12/88 unless otherwise noted.
  - b/ Accounts Receivable includes refunds, rebates and reimbursements received between 9/13/88 and 12/31/90. Amounts received between 9/13/88 and 11/30/88 were verified via the Committee's Accounts Receivable records. Figures between 12/1/88 and 12/31/90 are per reports filed and are subject to audit verification.
  - c/ These amounts include actual payments and estimated amounts based in part on Committee disclosure reports and are thus subject to change.
  - d/ Contribution Refunds paid between 9/13/88 and 12/31/90 include refunds of prohibited contributions, contributions with incorrect payees and other refunds. Figures included are per reports filed and are subject to audit verification.
  - e/ Excessive in-kind contribution related to testing the waters expenditures made by Campaign America (See Finding III.C.12.).
  - f/ Under 11 C.F.R. §9034.4(b)(2), an expenditure which is in excess of any of the limitations under 11 C.F.R. Part 9035 shall not be considered a qualified campaign expense, which precludes such expenditures from inclusion in the NOCO presentation as set forth at 11 C.F.R. §9034.5. These expenditures were determined by the Audit staff to be allocable to Iowa or New Hampshire and are included in Finding C.9. and 10.
  - g/ Admin and Finance includes travel costs, rent, office space, other overhead costs and fundraising.
  - h/ These figures are subject to audit verification.

Therefore, as of September 12, 1988, the candidate's maximum remaining entitlement was \$68,751.41. Using the Commission's matching fund records and the Committee's disclosure reports as verified by the Audit staff, it was determined that the Committee received \$19,962.83 in private and public funds between September 13, 1988 and September 30, 1988, the date of receipt for the Committee's final matching funds payment.

### Conclusion

As of September 30, 1988, the date of receipt for the Committee's final matching funds payment, the candidate had not received matching funds in excess of entitlement. This analysis is subject to change based on future adjustments to the NOCO statement.

#### C. Use of Funds for Non-Qualified Campaign Expenses - Allocation of Expenditures to States

Section 9035(a) of Title 26 of the United States Code states, in part, that no candidate shall knowingly incur qualified campaign expenses in excess of the expenditure limitations applicable under section 441a(b)(1)(A) of Title 2.

Section 9038.2(b)(1)(A) of Title 11 of the Code of Federal Regulations provides, in part, that the Commission may determine that amount(s) of any payments made to a candidate from the matching payment account were used for purposes other than to defray qualified campaign expenses. Section 9038.2(b)(2)(ii)(A) states that an example of a Commission repayment determination under paragraph (b)(2) of this section includes determinations that a candidate, a candidate's authorized committee(s) or agents have made expenditures in excess of the limitations set forth in 11 C.F.R. §9035.

Sections 441a(b)(1)(A) and 441a(c) of Title 2 of the United States Code and Section 9035(a) of Title 26 of the United States Code provide, in part, that no candidate for the office of President of the United States who is eligible under Section 9033 of Title 26 to receive payments from the Secretary of the Treasury may make expenditures in any one State aggregating in excess of the greater of 16 cents multiplied by the voting age population of the State, or \$200,000, as adjusted by the change in the Consumer Price Index.

Section 106.2(a)(1) of Title 11 of the Code of Federal Regulations states, in part, that expenditures incurred by a candidate's authorized committee(s) for the purpose of influencing the nomination of that candidate for the office of President with respect to a particular State shall be allocated to that State. An expenditure shall not necessarily be allocated to the State in which the expenditure is incurred or paid. In the event that the Commission disputes the candidate's allocation or claim of exemption for a particular expense, the candidate shall

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demonstrate, with supporting documentation, that his or her proposed method of allocation or claim of exemption was reasonable. Further, 11 C.F.R. §106.2(c) describes the various types of activities that are exempted from State allocation.

Section 106.2(c)(5) of Title 11 of the Code of Federal Regulations states, in part, that an amount equal to 10% of campaign workers salaries and overhead expenditures in a particular State may be excluded from allocation to that State as an exempt compliance cost. An additional amount equal to 10% of such salaries and overhead expenditures in a particular State may be excluded from allocation to that State as exempt fundraising expenditures, but this exemption shall not apply within 28 calendar days of the primary election.

Section 106.2(b)(2)(iv) of Title 11 of the Code of Federal Regulations states, in part, that overhead expenditures include, but are not limited to, rent, utilities, office equipment, furniture, supplies, and telephone service base charges.

For the 1988 election, the expenditure limitation for the State of Iowa was \$775,217.60 and for the State of New Hampshire was \$461,000.00. The Committee provided computerized worksheets to the Audit staff that indicated allocable costs to Iowa and New Hampshire of \$793,230.82 and \$462,462.20 respectively, as of October 31, 1988. These totals agreed with the totals disclosed by the Committee on its FEC Form 3P, Page 3 as of March 31, 1989.

The Audit staff reviewed the Committee's allocation worksheets and analyzed the Committee's allocation methods. Based on this review the following additions to the Committee's allocation totals are required.

1. Twenty-Five Percent Fundraising Exemption -  
Travel, Events - Senator Dole and Events -  
Elizabeth Dole

The Committee applied a 25 percent fundraising exemption to the following expense code categories: Travel (Intra-state), Events - Senator Dole, and Events - Elizabeth Dole. The Committee did not apply the exemption to expenses within 28 days of either primary election.

The Committee Treasurer stated that the 25 percent exemption was taken to reflect the fundraising efforts associated with these three categories. He explained that whenever Senator Dole and Elizabeth Dole were traveling, they would make a request for contributions. Twenty-five percent was selected by the Committee as a "reasonable" judgment of what these requests were

worth to the Committee's fundraising efforts. No explanation for the inclusion of the Travel category in this calculation was offered by the Committee. No other evidence to support this exemption was provided.

Neither the Act nor the Commission's Regulations provide for a fundraising exemption for these expense categories. In the Interim Audit Report, the Audit staff noted that in the staff's opinion the Committee had not demonstrated that 25 percent fundraising exemption is reasonable. It was also noted that, absent the submission of documentary evidence to demonstrate that these exemptions are reasonable, the amounts excluded by the Committee from the Iowa and New Hampshire expenditure limitations (\$28,450.36 and \$13,997.06, respectively) had been included in the Audit staff's calculation. Finally, the Committee was requested to submit evidence which revealed the nature of the fundraising appeal for each event, how the appeal was delivered and the amount of resulting contributions.

In response to the Interim Audit Report, the Committee Treasurer cites 11 C.F.R. §100.8(b)(21)(i) which he quotes as follows:

"Any costs incurred by a candidate...in connection with the solicitation of contributions are not expenditures if incurred by a candidate who has been certified to receive Presidential Primary Matching Fund Payments..." He continues that "[i]n connection with the solicitation of contributions' is defined at 11 C.F.R. §100.8(b)(21)(ii) as meaning '...any cost reasonably related to fundraising activity..." The Treasurer states that "without the transportation of Senator and Secretary Dole through Iowa and New Hampshire, its fundraising appeal would have been zilch."

In response to the Audit staff's Interim Audit Report request for evidence which reveals the nature of the fundraising appeal for each event, how the appeal was delivered and the amount of resulting contributions, the Committee states that "[t]he nature of the fundraising appeal was 'Please give money,' the appeal was delivered by voice and the amount received is irrelevant." The Treasurer further argues that the direct costs listed in 11 C.F.R. §100.8(b)(21)(ii) are not exclusive and that they must only be reasonably related to fundraising. He adds that "[t]he fact that the Audit staff does not believe the transportation and event costs associated with the Senator and Secretary represent 'reasonable' fundraising costs does not preclude them from being such costs" and adds that the Committee took only 25% of these costs as exempt.

The Treasurer concludes that without these costs, the Committee would not have raised much money and that "a reasonable person might believe that 25% of such costs were reasonably associated with fundraising."

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The Audit staff reiterates that in order to exempt from allocation the expenditures included in the three categories discussed above, documentation supporting a fundraising appeal which can be associated with the expenditures is necessary. Since no such documentation was provided in the Committee's response to the Interim Audit Report, no adjustment to the allocations has been made.

2. Fundraising Exemptions - Direct Mail Costs

The Committee separated their direct mail costs into two categories: Postage/Printing and Newsletter/Postcards. For allocation purposes, the Committee excluded a percentage of these direct mail costs as fundraising. This percentage varied from item to item.

The Audit staff reviewed the documentation related to the Iowa and New Hampshire direct mail costs which had been given fundraising exclusions by the Committee to determine if these exclusions were supported. These mailings were targeted for these two states. The auditors did not accept the fundraising exclusions for the costs which had no solicitation samples available to review or for costs which had solicitation samples without a request for funds.

The Committee excluded the following amounts as the fundraising share of the direct mail costs:

Iowa	\$217,643.73
New Hampshire	\$ 43,877.56

Based on the Audit staff's review of supporting documentation regarding these direct mail costs, we were able to verify \$23,369.76 of the \$217,643.73 excluded by the Committee for Iowa, leaving the solicitation of funds unverified for direct mail costs of \$194,273.97 (\$217,643.73 - \$23,369.76). The Audit staff applied a 100% fundraising allocation to the \$23,369.76 of direct mail costs which contained a fundraising appeal resulting in a credit of \$20,370.42 for items not allocated 100% by the Committee. The adjusted unverified Iowa total is \$173,903.55 (\$194,273.97 - \$20,370.42).

The Audit staff reviewed the Committee's allocation worksheets regarding Iowa direct mail costs and noted purposes such as postcards announcing town meetings, Iowa newsletters, announcement letters, etc.

For New Hampshire, the Audit staff was able to verify \$129.50 of the \$43,877.56 excluded by the Committee. In addition, the Committee includes an adjusting journal entry in the amount of \$(6,418.91) for which no support has been provided. Therefore, the Audit staff was unable to verify \$43,748.06 of the \$43,877.56 excluded by the Committee for New Hampshire (\$43,877.56 - \$129.50). The Audit staff applied a 100% fundraising allocation

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to the \$129.50 of direct mail costs which contained a fundraising appeal resulting in a credit of \$129.50 for items not allocated 100% by the Committee. The adjusted unverified New Hampshire total is \$43,618.56 (\$43,748.06 - \$129.50).

The Committee was provided copies of workpapers in support of the auditors' figures.

The Committee's response to the Interim Audit Report includes explanations and documentation related to Iowa direct mail costs which the Committee believes documents a 50% fundraising exemption for several items noted as unverified by the auditors.

Based on our review of this information, the Audit staff has determined that of the \$173,903.55 noted as unverified Iowa direct mail costs, \$121,967.77 of these costs contained a direct fundraising appeal. Included in this amount is postage which as a result of material submitted can be associated with a particular solicitation. Included in this amount is postage which as a result of documents submitted can be associated with a particular solicitation. The remaining \$51,935.78 (\$173,903.55 - \$121,967.77) is still unverified and is allocable to the Iowa state limit.

The Committee's response did not address the \$43,618.56 of unverified New Hampshire direct mail costs and therefore \$43,618.56 is allocable to the New Hampshire state limit.

It should be noted that the Audit staff applied 100% of the direct mail costs which contained a fundraising appeal to exempt fundraising, as opposed to the 50% requested by the Committee.

3. Allocation of Intra-State Phone Calls Paid for With Telephone Credit Cards

Section 106.2(a)(1) of Title 11 of the Code of Federal Regulations states, in part, that expenditures incurred by a candidate's authorized committee(s) for the purpose of influencing the nomination of that candidate for the office of President with respect to a particular State shall be allocated to that State.

The Audit staff reviewed Committee headquarters telephone bills from April 1987 through March 1988 to determine the total amounts of intra-state phone calls made in Iowa and New Hampshire which were charged on Committee telephone credit cards. The Committee did not allocate these intra-state calls to the appropriate states. No explanation for this omission was provided by the Committee.

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The total of intra-state calls, adjusted for the 10% compliance and 10% fundraising exemptions, are as follows:

Iowa	\$23,280.46
New Hampshire	\$ 1,696.44

In the Committee's response to the Interim Audit Report, the Committee states that they agree with these allocations.

4. Phone Bank Operations

Section 106.2(a)(1) of Title 11 of the Code of Federal Regulations states, in part, that expenditures incurred by a candidate's authorized committee(s) for the purpose of influencing the nomination of the candidate for the office of the President with respect to a particular State shall be allocated to that State. An expenditure shall not necessarily be allocated to the State in which the expenditure is incurred or paid.

Section 110.8(c)(2) of Title 11 of the Code of Federal Regulations states that for State limitations, expenditures for fundraising activities targeted at a particular State and occurring within 28 days before that state's primary election, convention or caucus shall be presumed to be attributable to the expenditure limitation for that State.

The Committee had a phone bank operation located in Kansas City, Kansas from July 1987 through February 1988 and another in Wisner, Nebraska from October 1987 through February 1988. The auditors requested copies of the phone bank scripts but the Committee never provided them.

Kansas City Phone Bank

The Audit staff reviewed U.S. Sprint telephone invoices which contained 42,544 phone calls from the Kansas City phone bank, of which 5,587 (13%) were calls made to Iowa telephone numbers. The total cost of the Iowa calls was \$1,054.80. Calls made to New Hampshire were determined to be immaterial.

To derive the Iowa share of the other related phone bank costs, the Audit staff applied the 13% (Iowa percentage) to the other cost categories on the phone bills: Federal Excise Tax, Features Federal Taxes, Wats Equipment Charge and Volume Discount. The total Iowa share of these costs is \$73.01. The 13% was then applied to Rent, Salaries, and Reimbursements related to the phone bank. These costs were also adjusted for the 10% compliance and 10% fundraising exemptions. The total Iowa share of these costs is \$2,328.30. The total Iowa portion of the Kansas City phone bank is therefore \$3,456.11 (\$1,054.80 + \$73.01 + \$2,328.30).

The Committee did not allocate any of the costs associated with the Kansas City phone bank to Iowa. At the exit

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conference, the Treasurer stated that the Kansas City phone bank was set up to influence the entire country and therefore, the costs are not allocable to Iowa. He cited 11 C.F.R. §106.2(b)(2)(v) which states that expenditures for telephone calls between two States need not be allocated to any State.

The Committee was provided with copies of workpapers in support of the auditors' figures at the exit conference.

In the response to the Interim Audit Report, the Committee stated that they agreed with the Audit staff's allocation of \$73.01 to Iowa as the Iowa share of the other related Kansas City phone bank costs. They also agreed with the allocation of \$2,328.30 to Iowa as the Iowa share of Rent, Salaries and Reimbursements related to the Kansas City phone bank.

However, the Committee did not agree with the allocation to Iowa of \$1,054.80 of Iowa telephone call charges made from the Kansas City phone bank. The Committee cited 11 C.F.R. §106.2(b)(2)(v) which states that expenditures for telephone calls between two states need not be allocated to any state. The Committee asserted that "DFP fails to see how such plain language can be interpreted in any way except to exempt toll charges from state allocation."

The Committee added that they did not find any language in the Regulations or appropriate Explanations and Justifications, as cited by the auditors in the Interim Audit Report, that refuted the "plain meaning" of 11 C.F.R. §106.2(b)(2)(v).

The Committee also cited 11 C.F.R. §106.2(b)(1) which states that unless otherwise specified under 11 C.F.R. §106.2(b)(2), an expenditure incurred by a candidate's authorized committee(s) for the purpose of influencing the nomination of that candidate in more than one state shall be allocated to each state on a reasonable and uniformly applied basis. The Committee then noted that "[i]n case anyone wonders if the toll charges involved here qualify as an 'expenditure' for interstate calls, it should be noted that DFP paid the cost of these calls directly and that no third party was involved.

The Committee Treasurer additionally quoted the Explanation and Justification from the February 4, 1983 Federal Register which states that "Subsection (b)(2)(v) sets forth a new method for allocating telephone charges other than base service charges. All calls made within a particular State must be allocated to that State. Calls made between two States, whether or not using toll free service, are exempted from allocation." He added that the phrase "are exempted from allocation" was simple to understand. The Committee Treasurer continued that "[i]n the 1987 rewrite of many of the state allocation regulations the Commission again states that '[i]nter-state calls remain exempt from

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allocation under paragraph (b)(2)(v).'" He added that "I again do not see any meaning beyond what that simple statement states" and that "[t]he Commission specifically considered the exemption and chose not to change the language."

A similar issue arose in the audit of the 1984 presidential campaign of Senator John Glenn. In that case, the Final Audit Report stated that the interstate telephone call exemption was designed to eliminate the problems of trying to allocate telephone calls between offices of a campaign committee. Eventually, the dispute over these costs went to litigation. John Glenn Presidential Committee v. FEC, 822 F.2d 1097 (D.C. Cir. 1987). The Commission maintained that the regulation only applies when an expenditure is directed at attracting voters in more than one state. The court accepted this as a "rational explanation of the Commission's regulations." 822 F.2d at 1102. Since Iowa voters alone were the objectives of the telephone expenses, the court held that the "Commission reasonably concluded that the governing prescription was contained in 11 C.F.R. §106.2(a)(1)." 822 F.2d at 1102.

Since the telephone calls from the Kansas City phone bank were not exclusively targeted to Iowa, the Commission has determined that the \$1,054.80 of telephone charges for calls made to Iowa are not allocable to the Iowa spending limitation. However, the \$2,401.31 (\$73.01 + \$2,328.30) of other costs associated with the Kansas City phone bank are allocable to Iowa. In their response to the Interim Audit Report, the Committee agreed with this allocation.

#### Nebraska Phone Bank

The Committee had a phone bank operation in Wisner, Nebraska.\*/ The Audit staff reviewed the Great Plains Communication telephone invoices which contained 445,914 toll calls. Of these calls 338,675 (75.95%) were calls made to Iowa phone numbers. The cost of these Iowa calls was \$106,612.38.

To derive the Iowa share of the other related phone bank costs, the Audit staff applied the 75.95% (Iowa percentage) to the other cost categories on the phone bills: Equipment Charges, Federal Tax, Volume Discount and Telephone Facility Fee. The total Iowa share of these costs is a credit of \$(2,452.73). The 75.95% was then applied to Salaries and Overhead Costs related to the phone bank. These costs were adjusted for the 10% compliance and 10% fundraising exemptions. The total Iowa share of these costs is \$64,634.96. The total Iowa portion of the Nebraska phone bank is therefore \$168,794.61 (\$106,612.38 + \$(2,452.73) + \$64,634.96).

\*/ Wisner, Nebraska is located in northeast Nebraska about 40 miles from the Iowa border.

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During the fieldwork the Committee Treasurer stated that they allocated phone bank salaries and overhead costs to Iowa but that the telephone calls made from the phone bank to Iowa were not allocated to Iowa because they were considered interstate calls and therefore not allocable pursuant to 11 C.F.R. §106.2(b)(2)(v).

At the exit conference the Treasurer reiterated that in his opinion, calls from Nebraska to Iowa were not allocable to Iowa and the Committee had complied with the regulations. The Audit staff explained that in our opinion, the phone bank was set up primarily to target Iowa and therefore all calls to Iowa are allocable to Iowa.

Based on the rationale as set forth above, the Commission has determined that since telephone calls from the Nebraska phone bank were not exclusively targeted to Iowa, the \$106,612.38 of telephone charges for calls made to Iowa are not allocable to the Iowa spending limitation. Since the Committee allocated \$64,136.94 in non-telephone costs to Iowa from the Nebraska phone bank, the Audit staff concludes that a credit in the amount of \$(1,954.71) ( $\$64,634.96 + (\$2,452.73) - \$64,136.94$ ) should be applied to the Committee's Iowa allocations.

### Conclusion

The Committee agrees with the Audit staff's additional allocation related to the Kansas City phone bank for costs associated with the phone calls made to Iowa. After the deletion of the Iowa phone calls, the allocation to the Iowa spending limitation for the Nebraska phone bank is overstated by a similar amount. The resulting change to the existing allocations is immaterial.

### 5. New England (NE) Regional Office

Section 106.2(b)(2)(iv)(B) of Title 11 of the Code of Federal Regulations states, in part, that except for expenditures exempted under paragraph (c) of this section, overhead expenditures of a committee regional office or any committee office with responsibilities in two or more States shall be allocated to each State on a reasonable and uniformly applied basis. For purposes of this section, overhead expenditures include but are not limited to, rent, utilities, office equipment, furniture, supplies and telephone service base charges.

Section 106.2(a)(1) of Title 11 of the Code of Federal Regulations states, in part, that in the event that the Commission disputes the candidate's allocation or claim of exemption for a particular expense, the candidate shall demonstrate, with supporting documentation, that his or her proposed method of allocation or claim of exemption was reasonable.

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The Committee maintained an office in Manchester, New Hampshire which they treated as a regional office for six states in New England. The six states, along with the Committee's allocation percentages, and their respective primary/caucus dates are as follows:

New Hampshire (60%)	2/16/88
Massachusetts (20%)	3/08/88
Maine (5%)	2/26/88
Vermont (5%)	3/01/88*/
Rhode Island (5%)	3/08/88
Connecticut (5%)	3/29/88

The Committee Treasurer stated that the allocation percentages were developed in the Fall of 1987 and were based on a weighted average of anticipated hours to be worked by "regional" staff persons on each of the six states. The Audit staff asked if any adjustments to these percentages were made by the Committee during the operation of the regional office or after it ceased to exist to reflect actual experience. The Treasurer responded that no adjustments were made.

A request was made by the auditors that the Committee provide any planning documents used for the set-up and operation of the Manchester office as the NE Regional Office. The Committee Treasurer stated he would attempt to locate any documentation related to the planning of the regional office.

In an attempt to evaluate the reasonableness of the Committee's allocation of the Manchester office as the NE Regional Office, the auditors performed a number of analyses to identify the activities which related to the states involved.

a. Review of Payroll and Overhead Costs

A review was performed to identify payroll and overhead costs which the Committee allocated directly to the six states. With this information, a determination was to be made as to the extent the Committee offices located in the NE Region functioned autonomously.

The Committee allocated \$123,550.54 of payroll costs (Salaries\*\*/ - \$43,937.39, Consultants - \$79,613.15) directly to the six states whereas \$86,348.36 of payroll was allocated to the NE Region. In addition, the Committee allocated \$110,810.51 of overhead costs directly to the six states whereas \$86,668.67 of overhead was allocated to the NE Region. Categories of overhead costs include Telephone (Intra-state), Rent/Utilities, Supplies and Equipment (see Attachment 1).

\*/ Non-binding Primary. Republican Caucus - 4/26/88.

\*\*/ Includes FICA calculations as determined by auditors.

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The Audit staff noted that of the \$43,937.39 in salaries allocated directly to the six states by the Committee, \$-0- was allocated directly to New Hampshire. Massachusetts received the largest portion - \$37,085.69. Of the \$79,613.15 in consultant fees allocated to the six states, only \$15,313.55 was allocated directly to New Hampshire by the Committee. Therefore, direct charges to New Hampshire represent only 12% of salaries and consulting fees direct charged to the States within the region.

The Audit staff further noted that of the \$110,810.50 allocated to the six states for the overhead categories, only \$15,241.11 (or 14%) was allocated directly to New Hampshire by the Committee. Massachusetts again received the largest portion - \$56,052.93 (or 51%).

It is the opinion of the Audit staff that based on the Committee's direct allocations of payroll/overhead to the NE Region states, the Committee had independent offices in all these states but did not acknowledge an office for New Hampshire. For example, the Committee made direct allocations to New Hampshire of payroll and overhead in the amount of \$30,554.66, compared to Massachusetts - \$107,383.62, Maine - \$28,574.47 and Vermont - \$35,838.79. The primary dates for Massachusetts, Maine and Vermont were 3/8/88, 2/26/88 and 3/1/88 respectively, whereas the New Hampshire primary was held on 2/16/88 and is traditionally the most significant primary in the region.

b. Review of Staff Vendor Files

The Audit staff reviewed all available vendor files and travel reimbursement documentation for Committee staff whose salaries or consulting fees were included in the payroll costs allocated to the NE Region by the Committee. A determination was attempted as to whether these employees appeared to be performing "regional" activities or activities associated with just one of the states.

Of the five staff persons whose salaries were allocated to NE Region, four of them traveled extensively for the Committee. However, these four persons only left New Hampshire occasionally and no trips to the other states were documented after October 24, 1987. The Audit staff noted that many of these trips were to Boston, Massachusetts for staff training and staff meetings. The available documentation did not indicate any training or meetings occurring in New Hampshire. The fifth person apparently did not travel. Because of the nature of the available documentation, the Audit staff was unable to determine the assignments or projects these persons were involved in during their employment with the Committee.

The Regional Director for the New England Region worked out of the Committee's headquarters in Washington, D.C. after 6/1/87. His consulting fees were allocated 100% to Fieldstaff - Consultants (i.e., National Operations). A review of

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his vendor files revealed that he traveled from D.C. to New Hampshire frequently for short visits and occasionally visited the other NE states. Again, no documentation was available to determine the projects he worked on.

Of the three staff persons whose consulting fees were allocated to the NE Region, one was the Executive Director for the Massachusetts state office. A review of his vendor files did not show him leaving Massachusetts while employed by the Committee. The Committee originally allocated his \$18,500 in consulting fees to NE Region but later adjusted it by reclassifying \$15,500 of these fees to Massachusetts.

The second consultant, who was a resident of Vermont, was the Executive Director for the Vermont office and the only staff person for the Maine office. He primarily traveled in Vermont and Maine with a few trips to New Hampshire. The Committee originally allocated his \$15,500 of consulting fees to NE Region but later reclassified \$14,000 of these fees to Vermont.

The third consultant performed computer services from 8/9/87 through 2/27/88. Because she was a Manchester, New Hampshire resident and had no travel reimbursements, the auditors concluded that she worked at the Manchester office. This person received eight checks from the Committee for her services - five were allocated to NE Region - Equipment (\$1,522.50, 8/9/87-11/14/87), one was allocated to New Hampshire - Consultants (\$457.50, 11/15/87-12/19/87), one was allocated to NE Region - Consultants (\$365.00, 12/20/87-1/31/88) and the final one was allocated to New Hampshire - Consultants (\$142.50, 2/1/88-2/27/88). The auditors were unable to identify the projects she worked on from the available documentation.

c. Review of Committee's NE Region Allocations

The auditors performed a review of the available supporting documentation for all the Committee's allocations to the NE Region account codes to evaluate the allocations. Direct allocations by the Audit staff to the six states was undertaken based on our review of the vendor files (see Attachment 2).

Based on our review of the information made available, it is the opinion of the Audit staff that the Committee has not demonstrated that the office in Manchester, New Hampshire functioned as a regional office. Therefore, the Audit staff has determined that the \$150,506.55 of costs allocated to the NE Region by the Committee are allocable to New Hampshire. Since the Committee has allocated 60% of this total to New Hampshire through its regional allocations, the additional allocation to New Hampshire is \$54,341.62, determined as follows:

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Audit Allocations to New Hampshire	\$150,506.55	
Additional Portion to New Hampshire	<u>          x .40</u>	60,202.62
LESS: Audit Allocations of New England Regional Expenses to Other 5 NE Region States	9,768.33	
Overallocated % to New Hampshire	<u>          x .60</u>	<u>(5,861.00)</u>
Additional New Hampshire Allocation		<u>\$54,341.62</u>

d. Committee Comments

At the exit conference the Committee Treasurer stated that control of the offices in the other NE states was from the office in Manchester, New Hampshire and that expenses allocated directly to these states does not preclude the use of percentage allocations in a regional office concept. The former Treasurer stated that the "regional" office in Manchester remained open after the New Hampshire primary (2/16/88) which he believes supports their regional allocations. It appears from the auditors review of the vendor files that the NE Region's salaried employees were paid for the last time on 3/2/88 for the period 2/16/88-2/29/88, or one pay period after the New Hampshire primary. No records were available to show the duties of the NE Region office or employees.

At the exit conference, the Committee was provided with copies of work papers in support of the auditors' figures.

In the Committee's response to the Interim Audit Report, the Committee Treasurer explains that "[a]t the beginning of the campaign, DFP knew that a number of New England states would have early electoral tests of one sort or another" and that "[b]ecause of this, it was important that we utilize our resources in the months leading up to the various tests so as to maximize our success."

The Committee Treasurer states that in June of 1987, the Committee reviewed its staffing needs for the six New England states and they determined to set up a regional office in New Hampshire. He further states that "...the decision was, in some part, made with the beneficial affects it would have on the spending limit problem" but that "the decision was primarily made

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because of the understanding that the region's top people would necessarily spend most of their time in New Hampshire and therefore that state made the most sense to host a regional office."

He continues by stating that "[o]nce a decision was reached to place a regional office in New Hampshire, staff was asked to review the duties of the five New England staff people and make a determination of how much time each was expected to spend on New Hampshire versus the other New England states over the next several months as a whole. For any given week the time actually spent on one state or another might be different but I thought it appropriate to have an allocation formula based on the entire campaign rather than adjust it from one week to the next."

The Committee provided a copy of a memo dated June 23, 1987 in which the Treasurer points out that with the exception of the 70% estimated for the New Hampshire Executive Director, all employees were estimated to spend 40% of their time on New Hampshire (see Attachment 3). The Committee Treasurer states that "[g]iven the extreme doubt with which I knew the auditors would view a regional office, I set the regional allocation to 60% for New Hampshire, 20% for Massachusetts and 5% for the other four states." The Committee also provided a New England Regional Committee newsletter from November 1987 which contains articles regarding the Committee's regional approach to the New England states (see Attachment 4).

The Committee takes exception to the Audit staff's analysis of the direct costs to the other NE Region states. They state that "[t]he fact that DFP chose to have a regional office does not preclude it from having offices in the states covered by that regional office. That would be like saying that because we had a national office, we shouldn't have offices in the field. Of course we had significant direct costs in the states outside of New Hampshire, we were trying to win everywhere."

The Audit staff contends that based on our analysis of direct costs allocated to the NE Region states that it appeared that the Committee had independent offices in the five states other than New Hampshire. Since the direct costs allocated to New Hampshire were minimal, the "Regional Office" more closely resembled a New Hampshire state office than a regional office.

The Committee points out that the Audit staff notes that \$173,017 of payroll/overhead was allocated to the NE Region but that the Audit staff does not acknowledge that 60% of that figure was allocated to New Hampshire via the NE Region allocations. This 60% allocation is acknowledged in several places in the interim audit report. They add that they believe that a state with a regional office would have little in direct costs but would have the lion share of regional costs, which they point out is supported by the auditors' figures.

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The Committee also contends that the Audit staff does not mention that the Committee paid \$700 in January for another office in Manchester, New Hampshire and over \$3,000 for space it took over from the Haig Committee, which was all allocated directly to New Hampshire. They add that as in the other states, the Committee had space dedicated directly to New Hampshire. The Audit staff points out that the Committee paid \$1,400 on November 30, 1987 to the same vendor that the \$700 was paid to in January 1988. This \$1,400, for one month's rent plus a \$700 security deposit, was allocated to the NE Region. Also, of the \$3,013.66 paid to the Haig Committee in February 1988; \$66.66 was for rent, \$47 was for utilities and \$2,900 was for the purchase of yard signs.

Therefore, office rent allocated by the Committee directly to New Hampshire totalled only \$766.66. Contrary to the Committee's assertion, these expenses, which they direct charged to New Hampshire, were taken into account by the Audit staff as illustrated by Attachment 1, which was also attached to the interim audit report. Available documentation does not allow a determination to be made regarding that portion of NE Region rent expense which relates solely to New Hampshire.

In the Committee's response, the Treasurer states that he was confused by the \$150,506.55 figure on page 21 of the Interim Audit Report. This figure was the portion of costs allocated to the NE Region by the Committee which the auditors determined, from a review of the available supporting documentation, was allocable to New Hampshire.

The Committee also takes exception with the Audit staff's statement that the New Hampshire primary is traditionally the most significant primary in the region. The Committee states that they are not claiming that New Hampshire was unimportant and that the 60% allocation reflects this belief.

The Committee further states that if the Audit staff does not believe the allocation formula was reasonable then the Audit staff should provide the Committee with the allocation formula it deems as reasonable. Without documentation in support of the programs, activities and staff assignments involving the six states deemed NE Region states by the Committee, the Audit staff is unable to determine an allocation formula. If these materials had been provided by the Committee to the Audit staff when requested during the fieldwork and again in the Interim Audit Report, the Committee's allocation formula could have been reviewed for reasonableness or an alternative could have been proposed once it had been demonstrated that the Manchester office was actually a regional office.

The Audit staff concludes that, based on available information, the Committee's Manchester, New Hampshire office functioned primarily as the New Hampshire office. As noted above, the New Hampshire primary is traditionally the most significant

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primary in the region. The Committee acknowledges this in their response to the interim audit report and notes that their 60% allocation of the NE Region to New Hampshire reflects the State's importance. The Audit staff also believes that 60% is conceivably a reasonable allocation of any regional expenses incurred by the Committee. As noted in the Interim Audit Report and discussed above (Page 20), the Committee allocated no salary and relatively small amounts of consulting and overhead directly to New Hampshire (see Attachment 1). For the majority of expenses related to the New Hampshire office, the Committee does not distinguish between expenses which were incurred for their New Hampshire campaign and those which may have been "regional". Rather, the regional expense allocation was applied to the total of these two types of expenses. This point is demonstrated by Attachment 3. In this memorandum, the Committee makes estimates of the portion of certain individuals' time that would be dedicated to New Hampshire versus regional work.\*/ However, when the allocations were done, rather than applying the regional allocation formula to the regional portion of these salaries, it was applied to the sum of the New Hampshire and regional portions. No documentation is available to allow the Audit staff to determine the regional versus New Hampshire portions of the expenses associated with the NE Region. Finally, it is noted that when all salaries, overhead and other expenses for the states in the NE Region are taken together, the Audit staff's New Hampshire allocation represents only 46% of the total.

No changes have been made to the Interim Audit Report allocations.

6. Compliance Exemptions - Media Costs

Section 106.2(B)(2)(i)(B) states that expenditures for radio, television and similar types of advertising, including any commission, purchased in a particular media market that covers more than one State shall be allocated to each State in proportion to the estimated audience. It further states that the allocation shall be done using industry market data.

Section 106.2(c)(5)(i) of Title 11 of the Code of Federal Regulations states, in part, that exempt compliance costs are those legal and accounting costs incurred solely to ensure compliance with 26 U.S.C. 9031, 2 U.S.C. 431 AND 11 C.F.R. Chapter I, including the costs of preparing matching fund submissions. The costs of preparing matching fund submissions shall be limited to those functions not required for general contribution processing.

Section 441d(a)(1) of Title 2 of the United States Code states that whenever any person makes an expenditure for the

\*/ No information is available to determine if these estimates proved to be accurate.

purpose of financing communications expressly advocating the election or defeat of a clearly identified candidate, or solicits any contribution through any broadcasting station, newspaper, magazine, outdoor advertising facility, direct mailing, or any other type of general public political advertising, such communication, if paid for and authorized by a candidate, an authorized political committee of a candidate, or its agents, shall clearly state that the communication has been paid for by such authorized political committee.

The Committee applied a 10% compliance exemption to their media costs which according to the Committee treasurer represents the costs incurred for including the disclaimer notice required by 2 U.S.C. §441d(a) on broadcast media. The amounts exempted by the Committee were as follows:

Iowa	\$16,061.46
New Hampshire	\$13,961.15

The Audit staff disagrees with the Committee's application of compliance exemptions to their media costs.

The cited regulations on media allocation make no provision for a compliance allocation. Further, the definition of a compliance cost speaks in terms of cost solely to ensure compliance. The section goes on to explain one category of expense where an incremental cost analysis is used to determine which costs will be considered solely to ensure compliance. Though not contemplated by the regulation, if a similar analysis was attempted on media, the incremental cost would appear to be at the production stage rather than for air time. Production costs need not be allocated to any state.

Some exceptions to the "solely to ensure compliance" test have been provided by Commission regulations. These relate to salary and overhead costs for both state and national headquarters operations. Percentages are given for compliance deductions for these categories of expenses. These exceptions are, however, very specific and narrowly drawn and do not cover broadcast media.

At the exit conference, the committee treasurer referred to advisory opinion 1988-6 which allowed the allocation of 50% of media air time costs to fundraising if a request for funds as short as 3 seconds occurred. The Audit staff does not believe that a deduction for compliance is analogous. First, the advisory opinion notes that ads have two purposes, the raising of funds and influencing of voters. The required notice does not add a third reason for running the broadcast, but is required as a condition of accomplishing one or both of the two campaign purposes. Second, to qualify for a fundraising exemption, 11 C.F.R. §100.8(b)(21) requires that expenditures need only be "in connection with the solicitation of contributions" while to qualify as a compliance expense, 11 C.F.R. §100.8(b)(15) requires

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that expenditures be "solely to ensure compliance."

At the exit conference, the Committee was informed of the Audit staff's position. No documentation supporting the Committee's application of a 10% compliance exemption to broadcast media costs has been provided.

In the Committee's response to the Interim Audit Report, the committee reiterates that they incurred costs to air the required disclaimer. They further state that "[w]hether or not DFP would have incurred such costs in any event is, at best, difficult to determine. DFP believes 10% was reasonable, the auditors did not."

Since the Committee did not provide any documentation in support of their application of a 10% compliance exemption to broadcast media costs, no adjustment will be made to the auditors' allocations for the compliance exemptions related to media costs.

7. Broadcast Media

Section 106.2(b)(2)(i)(B) of Title 11 of the Code of Federal Regulations requires that expenditures for radio, television and similar types of advertisements purchased in a particular media market that cover more than one State shall be allocated to each State in proportion to the estimated audience. This allocation of expenditures, including any commission charged for the purchase of broadcast media, shall be made using industry market data.

The Committee contracted with Multi Media Services Corporation (MMSC) to provide media placement services and they contracted with Ringe Media, Inc. (RMI) to provide media planning and production.

The Audit staff reviewed all available radio and television station invoices to determine if Committee allocations to Iowa and New Hampshire were reasonable. The reasonableness of the allocations was tested by referring to the Arbitron television market share percentages and the Arbitron Ratings Radio Station Reference Report (1987 edition).

The major difference between the Committee's media allocations and the allocations determined by the Audit staff was due to the auditors' use of the Arbitron Radio book for New Hampshire. At the exit conference, the Treasurer stated that he was unaware of the existence of this book. The Committee had used the television percentages for their radio allocation which for New Hampshire resulted in a much lower allocation figure.

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The allocation figures for broadcast media are as follows:

	<u>Audited</u>	<u>Committee</u>	<u>Difference</u>
Iowa	\$163,210.60	\$160,614.62	\$ 2,595.98
New Hampshire	176,907.39	139,611.50	37,295.89

Therefore, the additional allocations are \$2,595.98 and \$37,295.89 to Iowa and New Hampshire respectively.

The Committee was provided with copies of work papers in support of the auditors' figures.

The Committee agrees with the Audit staff's additional allocations regarding broadcast media.

8. Media Commissions (Production)

The Committee paid RMI a commission equal to 1.5% of gross air time costs for all placements of commercials produced by RMI. This was in addition to the 4% commission paid to MMSC for commercials placed and a \$40,000 monthly fee paid to RMI. No allocations were made by the Committee to Iowa and New Hampshire for the 1.5% commission paid to RMI. At the exit conference the Treasurer stated that the RMI commissions were considered production costs and therefore not allocable to the state limits pursuant to 11 C.F.R. §106.2(c)(2). However, the auditors contend that the amount of these fees was dependent on the usage of the commercials and was therefore directly related to air time.

The following amounts were allocable:

Iowa	\$177,642.75 x 1.5% = \$2,664.64
New Hampshire	\$199,205.42 x 1.5% = \$2,988.08

In the Committee's response to the Interim Audit Report, the Committee takes exception to these allocations. They state that "...its contract with its media producer (Ringe Media) called for a flat monthly fee plus an additional payment based on the extent we used the commercials he produced." The Committee adds that they do not understand the relevance of the auditors' contention that the amount of these fees was dependent on the usage of the commercials and was therefore directly related to air time. They continue that a producer would receive more funds as the frequency of airing the commercials increased and that they do not know what "directly related to air time" has to do with the fee being considered a production cost.

Although the Committee feels that the 1.5% commissions paid to Ringe Media, Inc. were media production costs and therefore not allocable pursuant to 11 C.F.R. §106.2(c)(2),

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the Audit staff contends that the 1.5% of gross billings for air time paid to RMI is a cost of media placement and like other such costs is allocable to Iowa and New Hampshire.

9. Individuals' Travel and Salary

Section 106.2(b)(2)(ii) of Title 11 of the Code of Federal Regulations states that salaries paid to persons working in a particular state for five consecutive days or more, including advance staff, shall be allocated to each State in proportion to the amount of time spent in that State during a payroll period.

Section 106.2(b)(2)(iii) of Title 11 of the Code of Federal Regulations states that travel and subsistence expenditures for persons working in a State for five consecutive days or more shall be allocated to that State in proportion to the amount of time spent in each State during a payroll period. For purposes of this section "subsistence" includes only expenditures for personal living expenses related to a particular individual traveling on committee business, such as food or lodging.

Section 106.2(c)(5) of Title 11 of the Code of Federal Regulations states that an amount equal to 10% of campaign workers' salaries and overhead expenditures in a particular State may be excluded from allocation to that State as an exempt compliance cost. An additional amount equal to 10% of such salaries and overhead expenditures in a particular State may be excluded from allocation to that State as exempt fundraising expenditures, but this exemption shall not apply within 28 days of the primary election.

The Audit staff reviewed the vendor files related to Committee staff travel in Iowa and New Hampshire to identify travel and salary costs which although allocable were not allocated to these states by the Committee.

This review revealed that expenditures for intra-state travel and subsistence had been incurred by staff persons in Iowa and New Hampshire who were in these states on five or more consecutive days but were not allocated to the states by the Committee. The related payroll costs for these persons was also calculated and included as expenses allocable to these states. The payroll was calculated for the period of time in which these persons were documented as being in these states and was adjusted for the compliance and fundraising exemptions as appropriate.

Based on this review, the Audit staff determined that the following travel and salary cost totals be allocated to Iowa and New Hampshire:

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	<u>Iowa</u>	<u>New Hampshire</u>
Travel	\$46,584.43	\$51,309.52
Salary	<u>60,793.78</u>	<u>15,039.73</u>
TOTAL	<u>\$107,378.21</u>	<u>\$66,349.25</u>

The Committee was provided schedules of these travel and salary costs at the exit conference.

In the Committee's response to the Interim Audit Report, they provide arguments on a few of the travel and salary costs allocated to Iowa and New Hampshire by the auditors.

The Audit staff allocated to Iowa the salary of Tom Synhorst (co-Regional Director for Iowa) for paydays from March 13, 1987 through March 1, 1988 (also see Exhibit H). The Committee agrees with the Iowa allocations for the salary payments for paydays January 1, 1988 through February 15, 1988 (\$7,059.78). They disagree with the allocation of his 1987 salary payments (\$42,867.20) and one salary payment covering the period February 15, 1988 through March 1, 1988 which the Committee notes was after the Iowa caucus (\$2,418.98). Salary payments allocated to Iowa by the Audit staff totaled \$52,345.96.

The Committee states that for the 1987 salary payments, the auditors need more than a person's position to allocate the costs to Iowa. They add that they do not believe that the auditors have any record of Mr. Synhorst being in Iowa more than four consecutive days and that "[t]his is not because we were being cute and hiding his expenses somehow." The Committee further states that "...in the beginning, Mr. Synhorst was responsible for Kansas, a state DFP placed a great deal of importance in" and that "Mr. Synhorst returned to Washington on a regular and frequent basis." The Committee then states that "Mr. Synhorst may have violated the four day rule at some point of which I am unaware, but I believe the burden is still on the Audit staff to make such a showing."

The Audit staff notes that it included Tom Synhorst's 1987 salary payments as allocable to Iowa because of his position as co-Regional Director for Iowa, because the Committee provided him with an apartment in Des Moines, Iowa from March 1987 through February 1988 and because we were unable to determine from the documentation provided by the Committee the exact dates Mr. Synhorst was in Iowa or when he had returned to his permanent residence in Washington D.C., which he apparently did quite frequently. The auditors did note, from airline

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reservation\*/ and expense reimbursement documentation, at least sixteen occasions where Mr. Synhorst appeared to be in Iowa for five consecutive days or more.

As far as the inclusion of the paycheck covering the period February 15 through March 1, 1988, which the Committee disagrees with, the Audit staff notes that we included his salary through the end of February because the Committee paid for the rental of his Des Moines apartment for the month of February. The available documentation for Mr. Synhorst's expenses indicates that he was in Iowa through the date of the Iowa caucus (2/8/88), but that the auditors were unable to determine if he remained in Iowa through the end of February. Based on the Committee's argument, the Audit staff has deleted the \$2,418.98 of salary to Tom Synhorst for the February 15 through March 1, 1988 pay period.

The Committee objects to the auditors' allocation of one-fifth of a payment (\$597) to Long Lines Limited for airfare which represents Tom Synhorst's share of the payment. He was one of the five Committee officials on the flight. They state that the trip was in April of 1987 and that "[u]nless the auditors have evidence that he had broken the four day rule this charge should be removed." The Audit staff notes that the date of travel was April 14, 1987, that the trip was within Iowa only, and that according to airline reservation documentation for Tom Synhorst, he was in Iowa from April 8 through April 15, 1987. Based on this information, the \$597 allocation to Iowa will remain unchanged.

Given that Committee records do not establish Mr. Synhorst's whereabouts, his position with the campaign, and his association with a Committee-provided apartment in Des Moines, the Audit staff made no further adjustments to Mr. Synhorst's salary. When the Commission considered this matter, it was determined that \$17,858.87 of his 1987 salary was allocable. This amount is based on the number of days during 1987 that available documentation indicated he was in Iowa for periods of five consecutive days or more. This documentation generally established an Iowa arrival date and an Iowa departure date but did not always account for his whereabouts for each of the days in between.

Next, the Committee disagrees with \$15,377.20 in air charter service charges which the auditors have allocated to Iowa. This figure is comprised of amounts from three payments.

The first amount allocated by the auditors to Iowa was \$3,448.00 for two flights on February 7, 1988. the first flight was from Omaha, Nebraska to Ft. Dodge, Iowa and included Senator and Mrs. Dole and six other Committee officials and staff. It should be noted that the Audit staff considered this Iowa

\*/ This information shows only reservations not actual flights and does not include travel not arranged by the Committee's travel agency.

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intra-state travel because the entourage attended an event in Glenwood, Iowa prior to flying to Ft. Dodge, Iowa via an Omaha, Nebraska airport. The second flight was from Ft. Dodge, Iowa to Des Moines, Iowa with the same eight persons aboard.

In the Committee's response, they point out that Mrs. Dole was in Iowa from February 7 through 9 (less than five days) and therefore her costs were not allocable. The Audit staff concurs with this statement and therefore backs out her share of these two flights, as well as an additional share for the Committee staff person who accompanied her on these trips. The adjusted total for the first amount is therefore \$2,586.00 (\$3,448.00 - \$862.00).

The second amount allocated by the auditors to Iowa was \$6,091.20 for two Iowa intra-state flights for Senator Dole and five other staff members who were in Iowa for at least five days. No change to this amount has been made.

The third amount allocated by the auditors to Iowa was \$5,838.00 which, according to the check tissue, was for "air travel E. Dole and staff." The auditors were unable to determine from the Committee's records where this travel occurred, when this travel occurred, and except for Mrs. Dole, who the travelers were.

The Committee provided documentation which demonstrated that this payment was for inter-state travel and therefore not allocable to Iowa. The Audit staff has adjusted the allocable amount to Iowa by \$5,838.00.

The Committee further objects to the \$5,212.18 in Visa card charges which the auditors have allocated to Iowa. This total is for six charges (\$5,128.42) by Senator Dole, for which the transaction dates were 12/29/87 for one item and early February 1988 for the other five items, and one charge by Mrs. Dole (\$83.76) with a transaction date of 2/7/88. The 12/29/87 charge by Senator Dole (\$72.02) was for a purchase at Radio Shack in Keokuk, Iowa and the other five charges by Senator Dole in early February 1988 were travel-related and were around the February 3 through February 9, 1988 time period he was documented to be in Iowa.

Since Mrs. Dole was documented to be in Iowa from February 6 through February 9, 1988, the Audit staff concurs with the Committee for this item and has deleted the \$83.76 from Iowa allocation.

The Committee states that it is confused over the auditors' allocation of charges to New Hampshire related to costs incurred at the Merrimack Hilton.

The Committee made 2 payments to the Merrimack Hilton totaling \$9,184.88. The first on August 24, 1987, was a

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deposit for "election night/week." This \$4,000 was allocated to New Hampshire by the Committee. The second payment was \$5,184.88 made on January 28, 1988 and represents the balance due on the charges. Of this amount, \$802.50 was allocated to New Hampshire by the Committee. The amount billed by the Merrimack Hilton includes charges for Senator Dole and Committee staff between February 9 and February 16, 1988. Among these charges are a suite for one week for the Doles (\$1,917.44), one staff room (\$1,917.44), two rooms for seven nights (\$1,168.44), ten rooms for three nights (\$2,503.80), use of the grand ballroom (\$802.50), and an unspecified charge of \$714.76. The Audit staff allocation of \$4,221.88 was determined as follows:

Total Payments	\$ 9,184.88
Less: Press Filing Room	( 160.50)
Committee Allocations	<u>(4,802.50)</u>
Additional Allocation	<u>\$ 4,221.88</u>

The charge for the ten rooms for 3 nights is included though the documentation does not indicate who, if anyone, occupied the rooms. This charge is therefore allocable under the general allocation provisions of 11 C.F.R. § 106.2(a)(1). Since no documentation was provided by the Committee to refute the auditors' allocation, the \$4,221.88 amount remains unchanged.

10. Non-Travel and Salary

During the review of vendor files the Audit staff noted non-travel and salary costs which were allocable to Iowa and New Hampshire but were not allocated to these states by the Committee. Examples of costs in these categories include meeting expenses, car rentals, telephone, event expenses, and newspaper subscriptions. The Audit staff determined that non-travel and salary costs, which were allocable to Iowa and New Hampshire, totaled \$64,008.61 and \$34,170.96 respectively.\*

The Audit staff provided schedules of these non-travel and salary costs to the Committee at the exit conference.

Iowa

The Committee objects to the following charges allocated to Iowa by the Audit staff:

\*/ These allocable amounts have been reduced due to Polling Expenses having been moved to section 11 below (\$16,200.00 in Iowa and \$14,697.52 in New Hampshire).

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(a) Southwestern Bell, \$379.95

The Committee states that the equipment was sent to Iowa for the announcement tour but did not remain there since it was used by the advance staff after Iowa. The Audit staff notes that since no information was provided regarding how long the equipment was used in Iowa, the \$379.95 allocated to Iowa remains unchanged. The invoice date for this equipment was November 24, 1987 so it is possible the equipment was in Iowa for at least two months through the date of the Iowa caucus (2/8/88).

(b) R.G. Dickinson & Co., \$72.00

The Committee states that this item was charged to an account which was subsequently allocated to Iowa. The Audit staff concurs and has deleted this item.

(c) RST Marketing, \$32,189.33

The Committee provided a sample of the fundraising letter from Senator Chuck Grassley (Iowa) which the auditors agree demonstrates that the cost associated with this mailing are exempt fundraising. Of the \$32,189.33 allocated by the auditors, \$25,880.86 was related to the Grassley mailing and has been deleted. In addition, since the Committee allocated 10% of the cost of this mailing to the Iowa state limitation (\$2,875.65), the auditors have allowed a credit in this amount to Iowa.

The Committee did not provide any information regarding the remaining \$6,308.47 paid to RST Marketing, so that amount will remain allocated to Iowa.

(d) Postmaster, \$7,076.41

This item was included in the documentation provided to the Committee at the exit conference but was not included in the Interim Audit Report figures. The Committee was provided with the revised documentation shortly after the exit conference.

New Hampshire

The Committee also objects to the following charges allocated to New Hampshire by the Audit staff:

(a) Southwestern Bell, \$379.95

For the reasons provided earlier under Iowa for this vendor, the \$379.95 allocated to New Hampshire has not been adjusted.

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(b) Manchester Union Leader, \$85.80

The Committee states that this charge was for a subscription for the national office. The Audit staff concurs and has deleted this item.

(c) State of New Hampshire, \$1,000

The Committee states that they thought filing fees were exempt. The Audit staff contends that the \$1,000 filing fee is allocable to New Hampshire.

(d) Thomas Rath, \$10,855.25

The Committee states that Mr. Rath was a national consultant who lived in New Hampshire but worked for the national committee. They add that his travel expenses will reflect this and that "[j]ust because someone has his checks mailed to his home in New Hampshire does not mean that New Hampshire is all they knew about."

The Audit staff notes that they reviewed invoices related to Mr. Rath's consulting firm, Rath & Young, and allocated costs, such as telephone conferences, which involved Committee staff known to be New Hampshire campaign personnel. Also included are costs related to any intrastate New Hampshire travel. Overall expenses and adjustment credits noted on each invoice were prorated by the auditors based on the percentage of time determined to be New Hampshire related.

The auditors note that costs not related to New Hampshire were not allocated to New Hampshire, as suggested by the Committee. The total costs allocated to New Hampshire was 41% of the total amount billed.

(e) William Landau, \$3,000

The Committee states that this charge was for a van wreck in Massachusetts and that even though New Hampshire was written on the supporting documentation, it occurred in Massachusetts. Since the documentation supports this explanation, this charge has been deleted from New Hampshire allocation.

11. Polling Expenses

Section 106.2(b)(2)(vi) of Title 11 of the Code of Federal Regulations states that expenditures incurred for the taking of a public opinion poll covering only one state shall be allocated to that state.

The Interim Audit Report explained that the Committee made payments totaling \$621,435.28 to the Wirthlin Group for polling services. It was further explained that the Audit

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staff reviewed the available documentation related to these payments, but that it was not possible to determine if the Committee's allocation of the expenses to spending limitations was correct because the documentation did not detail the coverage of the polls. The only exceptions were three payments related to Iowa and New Hampshire Focus Groups. These payments total \$16,200.00 for Iowa and \$14,697.52 for New Hampshire, and were included in Finding II.E.10., Non-Travel and Salary Costs, of the Interim Audit Report.

In the Interim Audit Report it was recommended that the Committee provide documentation related to polls conducted by the Wirthlin Group that would establish in which state the polls were conducted. It was also noted that after the documentation was reviewed additional recommendations may be forthcoming.

In response to the Interim Audit Report recommendations the Committee states that "Iowa was the obvious place to assess national media. The voters were more aware than any other state other than New Hampshire. Calling something an Iowa Focus Group does not mean that the expenditure was intended to influence Iowa voters." The Committee's response also states that one payment of \$479.52 was for interstate travel and therefore not allocable. No documentation related to any of the polling expenses was included with the Committee's response.

Subsequent to the receipt of the Committee's response to the Interim Audit Report, the Commission issued subpoenas to both the Committee and the Wirthlin Group requiring the production of the necessary records. The records provided indicate that the Committee conducted two public opinion polls in the State of Iowa and three in New Hampshire. The cost of these polls requires allocation to the state spending limitations.

The records produced also showed that the Committee commissioned one Focus Group in Iowa and two Focus Groups in New Hampshire. The pollster's reports were provided for the Iowa Focus Group and one of the two conducted in New Hampshire. These reports make it clear that the commercials being evaluated were produced specifically for use in Iowa or New Hampshire. They also indicate that the participants in the Focus Groups were all residents of the state involved. Finally, it is noted that both Focus Group reports indicate that the participants were also asked to view commercials being aired by one or more of Senator Dole's opponents. At the time of the Interim Audit Report only one of the two New Hampshire Focus Groups had been identified. The cost of both were included in the allocable amount by the Audit staff. It was also learned that the \$479.52 payment, which the Committee states is interstate travel, was travel related to one of the New Hampshire Focus Groups, and as such is allocable.

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A final item identified from the review of the polling records is a \$4,000.00 per month retainer paid for the months of January through March of 1988. A prorata portion of this retainer has been allocated to Iowa and New Hampshire by the Audit staff.

The Commission has determined that the Focus Groups and the pro rata share of the monthly retainer are not allocable. The remaining allocable polling expenses are as follows:

	<u>Iowa</u>	<u>New Hampshire</u>
Allocable Polling Expenses	\$ 57,486.25	\$ 57,578.50
Less:		
Committee Allocations	<u>(35,989.00)</u>	<u>(25,942.00)</u>
Additional Allocations	<u>\$ 21,497.25</u>	<u>\$ 31,636.50</u>

12. "Testing the Waters" Expenditures Made by Campaign America

Section 9034.4(a)(2) of Title 11 of the Code of Federal Regulations states that even though incurred prior to the date an individual becomes a candidate, payments made for the purpose of determining whether an individual should become a candidate, such as those incurred in conducting a poll, shall be considered qualified campaign expenses if the individual subsequently becomes a candidate and shall count against the candidate's limits under 2 U.S.C. 441a(b).

Section 100.8(b)(1) of Title 11 of the Code of Federal Regulations states, in part, that the term "expenditure" does not include payments made solely for the purpose of determining whether an individual should become a candidate. If the individual subsequently becomes a candidate, the payments made are subject to the reporting requirements of the Act. Such expenditures must be reported with the first report filed by the principal campaign committee of the candidate, regardless of the date the payments were made.

Section 100.7(a) of Title 11 of the Code of Federal Regulations states that a contribution includes a gift, subscription, loan, advance or deposit of money or anything of value by any person for the purpose of influencing any election for Federal office. The term "anything of value" includes in-kind contributions.

The Audit staff reviewed the disclosure reports filed with the Federal Election Commission by Campaign America (CA), a registered multicandidate committee associated with the candidate. The review was intended to determine if any of the activity disclosed by CA appeared to relate to the Presidential

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campaign. A group of transactions were identified from the CA reports which were questioned as possible testing-the-water expenses. A request for the records relating to these transactions was made by the Audit staff and again by the Commission. After both were refused, the requested records were subpoenaed by the Commission.

Campaign America registered with the Commission in March 1978. As background, Attachment 5 shows Receipts, Disbursements and year end Cash On Hand for each year from 1978 through 1988. A significant increase in activity is noted in 1986 and the first quarter of 1987. According to a copy of a newsletter provided by CA Senator Dole is the "Honorary Chairman" of CA.

As noted above, certain records were obtained from CA via subpoena. The records obtained were for the period August, 1986 through April 1987 and included cancelled checks and related invoices for disbursements to vendors and persons shown on CA reports as having an Iowa or New Hampshire address. The Interim Audit Report presented an analysis of the documents obtained along with related activity noted in CA reports. Based on that analysis, the Interim Audit Report concluded that the records indicate the possibility of a "testing-the-waters" campaign by CA on behalf of the Committee. It was also noted that the information obtained was limited to payees with an Iowa or New Hampshire address and therefore omitted many possible "testing-the-waters" disbursements made to payees with addresses outside of those States.

The Interim Audit Report also stated that the disbursements which were considered potential "testing-the-waters" in Iowa total \$210,049.41. Of that amount, \$173,826.46 was believed attributable to the Iowa spending limitation. In New Hampshire the total was \$24,775.11 with \$23,329.73 attributed to the spending limitation. It was also noted that for purposes of the review the "5-day rule" as set forth in 11 C.F.R. § 106.2(b)(2)(iii) was not applied because the persons involved were CA personnel not Presidential Committee workers. Though the allocable amounts were stated in the report, they were not included in the preliminary calculation of amounts in excess of the Iowa and New Hampshire spending limitations pending the Committee's response to the Interim Audit Report and the review of additional records.

In the Interim Audit Report it was recommended that the Committee provide all documents associated with disbursements made by Campaign America and/or any state level account, division or committee which relate in any way to Iowa or New Hampshire for the period January 1, 1986 through March 31, 1987.

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In addition, the Committee was requested to provide the following:

1. The script(s) used for the telemarketing program that was conducted in Iowa in October and November, 1986;
2. The follow-up letter(s) used for the telemarketing program that was conducted in Iowa in October and November, 1986; and
3. All documents including, but not limited to invitations, hand-outs, press releases, flyers, transcripts, and speeches which relate to appearances made by Senator Dole in Iowa and New Hampshire.

In a separate letter to CA's Treasurer, the Commission requested that CA provide documents relating to disbursements made by Campaign America in Iowa and New Hampshire in connection with the presidential campaign of Senator Robert Dole that were not previously provided and specifically:

"1. All documents relating to all disbursements made by Campaign America Iowa Division and Campaign America New Hampshire from January 1, 1986, to March 31, 1987. This request includes, but is not limited to invoices, canceled checks, debit memoranda, bank statements, signature cards, and accounting records.

"2. The following documents:

a. the script(s) used for the telemarketing program that was conducted in Iowa in October and November, 1986;

b. the follow-up letter(s) used for the telemarketing program that was conducted in Iowa in October and November, 1986; and

c. All documents including, but not limited to invitations, hand-outs, press releases, flyers, transcripts, and speeches which relate to appearances made by Senator Dole in Iowa and New Hampshire."

In its response to the Interim Audit Report the Committee treasurer states that "DFP strongly, but respectfully, objects to this recommendation. The two are separate committees. DFP is not required to maintain CA's records nor has it maintained such records. As such, DFP is unable to provide any requested records." The Committee provided no further information.

However, Counsel for CA responded to the request for records made of that committee. Though denying any CA disbursements were in connection Senator Dole's presidential campaign, copies of documents, including bank statements invoices and cancelled checks for expenditures relating to Iowa or New Hampshire were provided. In addition, CA provided the script and

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related documents used for the telemarketing program in Iowa; a follow up letter associated with the telemarketing effort, and several documents relating to CA speeches made by Senator Dole in Iowa and New Hampshire.

The conclusions presented below are based on an analysis of the documents provided by CA in response to the request for records, material obtained via subpoena and discussed in the interim audit report, CA and other committee disclosure reports, and Committee records.

a. Iowa

The Audit staff concludes that CA engaged in Presidential testing-the-water activity in 1986 and 1987 and that portions of that activity are allocable to the Iowa spending limitation. Specific programs and types of expenses are discussed below:

i. Telemarketing

The largest single program that CA conducted in Iowa appears to be a telemarketing program which took place in October and November of 1986. According to the telemarketing contract, the phone calls were to begin on October 16, 1986 and be completed by October 30, 1986. The election date was November 4, 1986. The contract stated that people who responded favorably to the survey would be sent a follow-up letter. An additional series of phone calls was added later and were to be completed by November 2, 1986.

The Reports Analysis Division questioned CA about the telemarketing program. In a letter from Judith Taggart, CA Treasurer, dated June 24, 1987 it was explained that this program was "to determine the best means for supporting 1986 state and federal candidates" and "no Iowa candidates were named in this effort, thus the expenditure was general party building." In correspondence, this telemarketing effort is referred to as either Iowa Phone Program, Get Out the Vote Program, or survey.

In a letter from the telemarketing firm to the treasurer of CA, the telemarketing firm noted that "Floyd Brown, your field representative for this region has been extremely helpful in making this survey most successful for Senator Dole." (emphasis added)

The Audit staff reviewed the CA disclosure reports to identify candidates and committees supported by CA between October 16, and November 4, 1986. Only \$7,750 was spent by CA in direct support; \$3,000 for Federal candidates, \$2,500 for State candidates and \$2,250 for local party committees. In addition, in-kind disbursements totaling \$9,791.98 for the follow-up mailing mentioned in the telemarketing contract were reported to seven state candidates.

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In response to the Commission's request for records associated with the interim audit report, CA submitted additional documentation for the telemarketing program.

An early August 1986 CA internal memorandum states that the purpose of the program would be "To assist Governor Branstad and other state and local candidates in Iowa by conducting a GOTV program featuring the Majority Leader" (emphasis added). Under "outline" the memo states that Republican voters would be called and asked their position on state and local elections, whose endorsement would make them more likely to support the GOP candidates, queried about their attitude on farm policy, and finally, tested on their level of participation. Certain respondents then were to receive a follow-up letter. (See Memorandum at Attachment 6)

Campaign America also submitted what appears to be a proposal from the telemarketing firm. The proposal is addressed to Mr. Tom Synhorst (see discussion of Mr. Synhorst's activity below). Though the proposed program is more ambitious than that carried out, the proposal lists three major objectives:

1. To contact 228,000 Iowans and determine whether the endorsement of each of seven prominent individuals is more or less likely to influence their supporting the Governor in the November election.
2. To record each person's attitude to the above mentioned questions and store this information for future telemarketing based on their response. Those showing a favorable response to a particular individual's endorsement were to be re-contacted within the final weeks before election.
3. To cost effectively provide high quality and accurate survey data that can be utilized throughout the project at the client's discretion. (See Attachment 7).

Included with the telemarketing documents is a copy of the script apparently used in the program. It contains six questions. The first two ask if the respondent supports Governor Branstad and his statewide ticket, and a named Republican candidate for the legislature. The third and fourth questions are the same, but request a first and second choice. The question is which of the listed leaders' endorsement would most likely cause the respondent to vote for a candidate in the 1986 general elections. The list of leaders contains the names of eight Republicans, including Senator Dole, who were, at that time, considered presidential hopefuls. Question five asks for approval or disapproval of the Reagan administration farm policy and question six seeks to determine respondent participation in the election process. Six participation choices are given; General Elections, Republican Primaries, Presidential Caucuses, County Republican Convention, Contributions to Republican Candidates, Volunteer for Candidates. By late October 1986, few of these

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choices would seem to be relevant to the 1986 election cycle. (See Attachment 8).

Two documents showing survey results were provided. The first is on the telemarketing firm's letterhead, dated October 31, 1986, and addresses only questions 3 and 4. The analysis provides "B.D. responders" for each question. (See Attachment 9)

The second document is a computer printout and appears to be a more thorough analysis of the results. The results for questions 3 and 4 are entitled President, 1st and President, 2nd.\*/ (See Attachment 10)

It is the opinion of the Audit staff that given the questions asked during this survey and that Governor Branstad appears to be a supporter of Senator Dole (see discussion below of "Agricultural Summit" held in late November 1986 and co-hosted by Senator Dole and Governor Branstad), the primary purpose of this telemarketing effort was testing-the-waters and the costs are allocable to Iowa. Campaign America paid the telemarketing firm \$70,859.65 for their services.

In addition to the expenses discussed above, CA paid a Washington area firm \$8,010.67 to purchase and edit the Iowa Republican voter tape, print survey cards, print labels, keypunch telephone canvass card data, update the master file with survey data, and print selected "Dole favorable" labels. These costs are also allocable to Iowa. Campaign America also made three payments in early 1987 to this vendor for services described as selecting and printing of Dole favorables; computer tapes of Dole favorable (first choice), Dole favorable (second choice); and selecting and printing labels for persons in selected Iowa counties. These invoices suggest use of the survey data with respect to CA events in Iowa during January and February 1987. The three payments total \$979.60 and are allocable to Iowa.

The Committee used the services of this same vendor and made payments to the vendor in excess of \$400,000.

Campaign America provided documentation for the telemarketing follow-up letters. The cost of printing and mailing 58,000 letters was \$11,091.98. An apparent draft of the letter was submitted. The letter encourages the addressees to vote for Governor Branstad and points out Senator Dole's leadership on agricultural issues. (See Attachment 11)

\*/ On the copy of the telemarketing script provided by CA, Senator Jesse Helms is listed among the leaders for questions 3 and 4. On the summary of survey results, Senator Helms has been replaced by Alexander Haig.

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Campaign America reported these expenses as in-kind contributions to seven Iowa candidates. The cost of this letter is allocable to Iowa.

The Commission determined that only the tele-marketing expenses CA paid to a Washington area firm in the amounts of \$8,010.67 and \$979.60 are allocable. Attachment 12 is a summary of the telemarketing expenses.

ii. Events

The CA records made available indicate that at least 19 events, speeches, or meetings were held in Iowa between March 31, 1986 and February 23, 1987. These records also indicate that Senator Dole was present for 17 of the events. Though the available records do not establish the nature of all of the events the following items are noted:

- ° In mid April 1986, CA paid expenses for receptions in Wapello, Iowa. Available records do not establish the attendees or the purpose of the event.
- ° In early May 1986, Senator Dole and 8 other persons were in Iowa for the Iowa Republican Congressional District Conventions.
- ° In June 1986, Senator Dole and three others were in Iowa for the Iowa Republican Convention.
- ° In late July 1986 Senator Dole is shown as the "Special Guest" at a picnic in Atlantic, Iowa sponsored by the Fifth District Republican Party.
- ° In late August, 1986 Senator Dole and 6 others were in Iowa for the Iowa State Fair. CA paid for a backdrop and flags which were delivered to the fairgrounds.
- ° In mid September 1986, Senator Dole and three others were in Iowa for "Senator Grassley Birthday Events".
- ° In mid October 1986, a "Steering Committee Meeting" was held in Des Moines. At least four CA personnel attended.
- ° In late October 1986 Senator Dole visited at least three cities in Iowa along with six other persons whose expenses were paid by CA.

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- In late November, 1986 Senator Dole and Iowa Governor Terry Branstad hosted a "farm summit" in Des Moines. CA paid travel expenses for Senator Dole and 4 other persons.
- In early December 1986, Senator Dole and three others traveled to Iowa for an address by Senator Dole before the Iowa Sheriff's and Deputies Association.
- In mid January 1987. Senator Dole traveled to Iowa for an address before the Iowa Lumbermens Association. Other documentation submitted suggests that other groups may have been addressed during this time.
- In late January 1987, Senator Dole traveled to Iowa to address the "AGC". The documentation indicates the topics related to the construction industry.
- Campaign America sponsored at least three "Town Meetings" in Iowa. Documentation provided indicates that the events occurred on 2/7/87 in Orange City, Iowa; 2/12/87 in Dubuque, Iowa and 2/22/87 in Des Moines. These events appear to be similar to the events of the same name sponsored by the Presidential Committee. The 2/22/87 Town Meeting occurred after the beginning of the Presidential Committee activity. (The Committee's earliest reported expenditure is 2/10/87 and the Committee's first bank account opened on 2/18/87).

The invitation postcards were printed by the same Iowa firm who printed the later cards for the Committee. The postcard for the February 22, 1987 town meeting appears to be the same size and format as those used by the Committee, and uses the same photograph of Senator Dole. No samples for the others are available. The postcard for the February 22, 1987 event begins with the message "With the 1986 campaign behind us, Republican voters and candidates clearly have major challenges ahead in 1988. During this meeting I would like to hear your views and concerns while sharing some of my own with you regarding our shared Republican future." A flyer associated with the same printing bill is entitled "Bob Dole on the Issues" and includes a quote from the Washington Times of January 15, 1987 which begins "If Sen. Robert Dole is running for the White House, he's off on the right foot."

In addition on February 7, 1987 Senator Dole addressed the Iowa Bankers Association in Sioux

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City. In the text of that speech Senator Dole comments "Sioux City is one of my favorite places. In fact, lately, any place in or near Iowa is one of my favorite places." (See Attachment 13, p. 1) In a memorandum dated February 18, 1987 titled "Iowa talking points" under the sub heading "General Objectives of Iowa Talking Points" the following appears:

"Offer Iowans a Friend in the White House. If candidates are confronted with questions: How should your PAST commitments assure Iowans that if you are elected Iowa will have a friend in the White House..." (emphasis in original). (See Attachment 14, p. 4)

- o Finally, on February 23, 1987 CA paid for a breakfast for 53 people in Davenport, Iowa. The talking points memorandum noted above begins with a section titled Quad Cities Issues.\*/

During the period covered by these meetings and events Senator Dole appears to have made 17 trips to Iowa and visited 18 different cities some repeatedly. The costs associated with these events which are not included elsewhere total \$76,403.80 of which \$30,268.81 is allocable to Iowa.

The Commission determined that of the events discussed above, only the expenses associated with the three Iowa Town Meetings (2/7/87, 2/12/87, 2/22/87) and the 2/23/87 Breakfast Meeting in Davenport, Iowa are allocable. These expenses total \$14,684.35. Attachment 15 includes a listing of events and associated expenses.

### iii. Campaign America Iowa Staff

In addition to the Iowa activity discussed above, CA records show a significant staff effort in Iowa during 1986 and early 1987.

- Floyd Brown: Mr. Brown's mailing address is in the Washington D.C. area. Available records indicate that he was on the CA payroll effective mid March 1986 through late February 1987. He was on the Committee payroll effective March 16, 1987 with the title of Regional Director for IL, IN, IA, ND, SD, WI, MN, NE, and MO.

During his employment at CA, records reviewed indicate that Mr. Brown made 29 trips to Iowa of 1 to 6 days in duration. He was in Iowa before and/or during nearly all CA Iowa

\*/ Quad Cities are comprised of the following: Davenport, IA; Bettendorf, IA; Moline, IL; and Rock Island, IL.

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Also the postage for the follow up letters associated with the telemarketing program (\$5,950.00) was apparently paid by Mr. Synhorst in Des Moines during the later part of October and reimbursed by CA. A memo from Mr. Synhorst apparently faxed from Senator Grassley's office requests checks for postage, printing and mailing. The postage check was made payable to Mr. Synhorst. According to the documentation submitted, the printing and mailing checks were dated October 27, 1986 and were "Federal Expressed" to Mr. Synhorst at Senator Grassley's Des Moines campaign office.

Mr. Synhorst is shown in Committee files as the addressee for telephone and electric bills for the Committee's Des Moines apartment beginning on February 17, 1987 for the electric service and February 13, 1987 for telephone service. Both of these dates are during his employment with CA and before the final CA Town Meeting. Two of his expense vouchers paid by CA in February contain charges for the security deposit and the first rent payment for the apartment. Mr. Synhorst notes that this is where he and the "National Staff" will stay when in Iowa. Mr. Synhorst also submitted an expense reimbursement request to the Presidential Committee dated February 4, 1987 to cover a clipping service. This request was made while he was employed by CA.

Mr. Synhorst is shown on the Committee's staff list as a regional director for Iowa and Kansas.

Mr. Synhorst' salary and expenses total \$20,955.78. The amount allocable to the Iowa spending limitation is \$17,688.78. As with Floyd Brown, the 5-day rule is not considered to be applicable. A schedule of Mr. Synhorst's activity is at Attachment 17.

In addition to Messrs. Brown and Synhorst, CA retained the services of seven individuals with Iowa addresses during parts of 1986 and early 1987. Each is briefly discussed below.

- Jane Voights: Ms. Voights was employed between mid June and the end of August 1986. She had a telephone in her name which CA paid for and which was referred to as CA's Iowa telephone. Her expenses were for car rentals, meals, mileage, supplies, lodging, stamps, etc. There was one shipping bill which described the contents as "Campaign Literature." The date and location to which the material was shipped corresponds to a late July event in Atlantic, Iowa.

Available records indicate that Ms. Voights was associated with at least four meetings or events in Iowa. One in late June at the time of the Iowa Republican Party convention, a late July event where Senator Dole was to appear, an early August meeting in Des Moines, and an October event in Council

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events, trips by Senator Dole and for various meetings with CA Iowa based staff. (See above.) During a number of these trips Mr. Brown paid for his expenses as well as those of other staff persons.

As noted in the discussion of the telemarketing program, a letter from the telemarketing firm in Des Moines refers to Floyd Brown as CA's field representative for that region. In late October he attended a "Steering Committee Meeting" in Des Moines. A note on records relating to a late November, 1986 trip states that he will meet with one of the Iowa CA staff concerning the "90 day plan." It is noted that this trip occurred after the 1986 election and that 90 days from the date of the trip would correspond to the beginning of Committee activity. Mr. Brown's expenses for this trip were paid by CA.

Though Mr. Brown travelled to other states on occasion, it is the opinion of the Audit staff that the records reviewed to date indicate that Mr. Brown's primary focus was on the state of Iowa and that when viewed in light of the other CA activities discussed below, his salary and expenses should be considered testing-the-waters expenditures. Attachment 16 shows Mr. Brown's travel and salary. Payments to Mr. Brown totaled \$47,823.40, of which \$38,052.40 is allocable to the Iowa spending limitation. (See also Attachment 15 - Events)

As noted above, given that during this time Mr. Brown was not a Committee staff person, no attempt has been made to apply the 5-day rule at 11 C.F.R. § 106.2(b)(2)(iii).

- Tom Synhorst: Mr. Synhorst appears to be the second CA staff person who has a Washington D.C. area address and whose primary focus was in Iowa. Mr. Synhorst received consulting payments of \$1,000 per month which appear to cover the period April through December of 1986 and salary for January/February 1987. The earliest expense request noted from Mr. Synhorst is for a trip in January 1987. However, other documents reviewed indicate that he was in Iowa earlier on several occasions beginning in March of 1986. It was also noted that Mr. Synhorst received consulting payments through November of 1986, as well as expense reimbursements, from the 1986 re-election campaign of Iowa Senator Grassley. Given his involvement in that campaign, it seems likely that he visited Iowa earlier in the year 1986 while receiving consulting payments from CA.

It was also noted that Mr. Synhorst held meetings or job interviews with several persons in Iowa. With the exception of one expense reimbursement these persons were not paid by CA, but in at least two cases, worked for the Committee.

The proposal from the telemarketing firm which handled the telemarketing program discussed above was addressed to Mr. Synhorst and dated August 1986.

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Bluffs. Consulting fees and expenses for Ms. Voights total \$5,049.89. The entire amount is allocable to the Iowa spending limitation. Ms. Voights received no payments from the Committee.

- John Rehmann: Mr. Rehmann was a paid consultant from July 1986 to January 1987. His expense reports indicate meals, telephone, and supplies. Like Ms. Voights he is associated with the late July event where Senator Dole was to appear.

He notes having attended a "strategy committee meeting" on October 22, 1986. He also notes expenses involved with the leasing of office space and gives an approximate location in Des Moines. CA shows no payments for Iowa office space but the Committee's Iowa office was located in the vicinity mentioned by Mr. Rehmann. Mr. Rehmann's consulting and expenses total \$3,734.13, of which \$3,729.43 is allocable to Iowa.

The Committee paid Mr. Rehmann consulting fees and expenses from mid-December, 1987 to mid-March, 1988.

- Cal Hultman: Mr. Hultman was paid a consulting fee from September 1986 until March 1987 and travel expenses. He notes having attended the October 22, 1986 "steering committee meeting" in Des Moines.

He also is associated with the late October, 1986 event noted above under Jane Voights. Mr. Hultman's fees and expenses total \$12,022.61, of which \$12,016.00 is allocable to Iowa. The Committee made no disbursements to Mr. Hultman.

- Penny Brown: Ms. Brown was paid a consulting fee for December 1986, and January 1987. She also received expense reimbursements. Available documentation indicates that Ms. Brown was associated with a December 7, 1986 visit by Senator Dole. (See Event listing at Attachment 15) Total payments to Ms. Brown are \$5,947.02, of which \$4,892.42 is allocable to Iowa. The Committee made no payments to Ms. Brown. Like Mr. Synhorst, Ms. Brown was an employee of the Grassley Committee in 1986.

- Jeff Nelson: Mr. Nelson was paid two consulting payments, one in November, 1986, and one in January, 1987. These payments total \$3,500.00 and are considered allocable to Iowa. Mr. Nelson received no payments from the Committee.

- Carol Lehmkuhl: Ms. Lehmkuhl was paid one consulting payment of \$1,200 on March 4, 1987. She received her first Committee salary check on April 1, 1987 and was shown by the Committee as the Des Moines Office Manager. Like Mr. Synhorst and Ms. Brown, Ms. Lehmkuhl was an employee of the Grassley Committee in 1986. The \$1,200 payment is allocable to Iowa.

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- Wythe Willey: Mr. Willey received one \$4,000 consulting fee to cover January and February 1987. He received no payments from the Committee. This payment is considered to be allocable to Iowa.

The Commission determined that only the CA Iowa Staff expenses associated with the three Iowa Town Meetings (2/7/87, 2/12/87, 2/22/87) and the 2/23/87 Breakfast Meeting in Davenport, Iowa are allocable. These expenses total \$5,155.31 for F. Brown and T. Synhorst and \$5,059.39 for other Iowa based staff. Attachment 18 is a listing of the Iowa staff expenses.

iv. Miscellaneous Iowa Expenses

Finally, there are a number of other Iowa expenses not included in the above categories. These include miscellaneous travel to Iowa, postage for Iowa mailings, charter costs for a trip to Cedar Rapids, and expenses for a December 1986 Washington, D.C. breakfast meeting concerning Iowa telecommunications. These expenses total \$3,746.93 of which \$3,097.93 is allocable to the Iowa spending limitation. Since none of these expenses are associated with the three Town Meetings or the Davenport Breakfast Meeting, the Commission determined that they are not allocable. (See Attachment 19)

The expenses discussed above indicate that CA engaged in activities in Iowa during 1986 and early 1987 which appear to be for the purpose of advancing Senator Dole's candidacy for nomination for the Office of President. The expenses show a significant staff presence in the State, a series of events and meetings many of which were attended by Senator Dole as well as addresses to various Iowa groups by the Senator. A substantial telemarketing program was undertaken to determine Senator Dole's strength compared to likely Presidential opponents and to identify potential supporters. In 1987, the CA Iowa staff also appear to have been making preparations for the Committee's Iowa effort. It is also noted that Senator Dole was seeking re-election to the Senate from Kansas in 1986.

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A summary of CA's Iowa expenses is shown below:

<u>Category</u>	<u>Iowa Allocable Amount</u>	<u>Iowa Non-Allocable Amount</u>
Telemarketing Program	\$ 8,990.27	\$ -0-
Events	14,684.35	6,522.50
IA Staff Expenses:		
F. Brown and T. Synhorst	5,155.31	1,476.00
Iowa Based Staff	5,059.39	-0-
Miscellaneous	<u>-0-</u>	<u>-0-</u>
<b>TOTAL</b>	<b><u>\$33,889.32</u></b>	<b><u>\$7,998.50</u></b>

b. New Hampshire

Similar to Iowa, CA was active in New Hampshire in the later part of 1986 and early 1987. Though the program appears to be smaller, the types of activity are similar and the conclusion concerning testing-the-waters is the same.

i. Events

Like Iowa, CA held a number of New Hampshire meetings, events or groups of events between March 1986 and February 1987. Available records indicate nine such events and it appears that Senator Dole was in attendance at seven of the nine. Listed below is specific information about these events.

- A meeting and luncheon for 18 people, including Senator Dole, was held in New Hampshire in early March 1986.
- In mid June 1986, Senator Dole and at least 2 other CA staff attended a "Rudman Event" in Manchester, New Hampshire.
- Donald Devine\*/ and Paul Russo were in New Hampshire between June 18 and 20, 1986.
- A series of events were held in New Hampshire between August 24 and 29, 1986. Senator Dole was in New Hampshire for the majority of this time. Available records make note of a photo opportunity, a Dole banquet and a luncheon. One expense

\*/ According to documents provided by CA, Donald J. Devine was the "Consulting Director" for CA.

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voucher refers to the "Liberty Weekend." In addition to some New Hampshire residents who were reimbursed for expenses, at least 5 others were in attendance including Secretary Dole. A bill from a photographer includes a charge for making a video tape of the Liberty Weekend. A memorandum from Suzanne Niemela notes that money was collected at the door of one event and paid directly to the restaurant. This memorandum also notes that seven checks made payable to the "Dole Committee" were collected and that Ms. Niemela needed assistance in cashing them. She states that "[t]hey should be deposited in the Campaign America PAC or 'Dole Committee' and a new check should be cut for the Greenhouse Restaurant."

° Campaign America paid for a hospitality suite on October 5, 1986 for the "Republican Convention."

° On October 24, 1986, Suzanne Niemela rented a backdrop, podium and public address system for a news conference.

° Between December 11 and 13, 1986, Senator Dole made two trips to New Hampshire. On December 12, food was purchased for a meeting. Also, a meeting room was rented and refreshments for 40 guests were ordered. Records further indicate that Senator Dole addressed the Portsmouth Rotary Club on December 11, 1986 and the University of New Hampshire commencement on December 13, 1986.

° Senator Dole visited two locations in New Hampshire between January 24 and 26, 1987. On January 25, CA paid for brunch for 67 people.

° Senator Dole was in New Hampshire on February 16, 1987 to address the Keene Rotary Club. Campaign America paid for a hospitality suite and refreshments for 90 people and a breakfast for 60 people.

Expenses for these events not considered elsewhere total \$25,148.10, of which \$16,025.71 is allocable to the New Hampshire spending limitation.

The Commission determined that none of the expenses associated with the events discussed above are allocable. Attachment 20 is a listing of these events.

#### ii. Voter Lists

The auditors reviewed documentation related to 117 payments, totaling \$3,136.26, to various New Hampshire towns for the purchase of Voter Lists. The dates of payments for these lists were between October 16, 1986 and January 29, 1987, although it appears that the initial request was made by letter, signed by Ms. Niemela, on October 3, 1986.

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iii. Telephone Expenses

Campaign America paid for a business telephone in New Hampshire. No record of payments for any office facility is noted in the available records and the documentation provided does not show an address. The telephone bills indicate that the service was maintained by CA between October 1, 1986 and February 24, 1987 at a cost of \$2,223.16. Of this amount, \$1,381.03 is allocable to the New Hampshire spending limitation. It was also learned that the Committee paid the telephone bill for the same telephone number covering the period February 25 to March 24, 1987.

iv. New Hampshire Staff

Campaign America employed three persons who appear to have worked on the New Hampshire programs.

Paul Russo: Mr. Russo was a Washington area consultant. Campaign America's reports indicate that Mr. Russo received his first consulting payment on April 1, 1986. This payment was likely to cover the month of March, 1986. His first expense reimbursement is reported as a March 12, 1986 transaction. No documentation was submitted by CA for payments made to Mr. Russo before June 1, 1986. In addition, no documentation was submitted for a June 30, 1986 expense reimbursement. Available documentation indicates that between the beginning of June 1986 and the end of August, 1986, all of Mr. Russo's travel was to New Hampshire. No travel reimbursements are reported after the August, 1986 trip. Mr. Russo received his last consulting payment on October 3, 1986.

A copy of a memorandum from Mr. Russo indicates that he had hired Suzanne Niemela (see below) "to work the New England Region for Campaign America, establishing a 'desk' in Concord, New Hampshire." As noted below, Ms. Niemela worked only in New Hampshire. It is also noted that Mr. Russo made a trip to Iowa during the first week of May, 1986.

Mr. Russo's consulting payments for June through August, 1986 are considered to be New Hampshire expenses. These payments total \$13,461.12 of which \$12,341.63 is allocable to the New Hampshire spending limitation.

The Committee made no payments to Mr. Russo. Attachment 21 is a schedule of the CA payments to Mr. Russo considered to be allocable to New Hampshire.

Suzanne Niemela: Ms. Niemela was hired effective July 1, 1986. On or about August 1, 1986, Ms. Niemela moved from Massachusetts to Concord, New Hampshire. Her moving expenses were paid by CA. Available documentation indicates that with the exception of one trip to the Washington D.C. area, Ms. Niemela worked exclusively in New Hampshire. She received

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consulting fees during the period July 1986 to February 1987 and expense reimbursements covering activity from September 1986 to February 1987. Expenses include phone, travel, supplies, copiers, typewriter rental, etc. Beginning in March 1987, Ms. Niemela received a salary from the Committee and is shown by the Committee under New Hampshire staff - Regional Advance and Scheduling.

Attachment 22 shows CA payments to Ms. Niemela. Payments related to New Hampshire total \$17,959.91 with \$17,818.26 being allocable to the New Hampshire spending limitation.

Finally, documentation was submitted for a New Hampshire trip made by a Mr. Jim Murphy on February 26 and 27, 1987. The only other payment to Mr. Murphy by CA was a \$1,250 consulting payment reported on March 12, 1987. Committee records indicate that Mr. Murphy was to be the Northeast Regional Director. A March 11, 1987 Letter of Agreement between the Committee and Mr. Murphy also notes that he was to be paid \$1,250 as a consulting fee for the period March 1, to March 15, 1987. The amount was paid on March 13, 1987. Committee documentation also indicates that Mr. Murphy was expected to live in the Boston area for the duration of the Campaign. On March 11, 1987, Mr. Murphy drove his car to Boston to "Begin Job." Mr. Murphy was later named the head of the Political Field Division and moved to the Washington area. He was on the Committee's payroll effective March 16, 1987. Total payments for Mr. Murphy by CA are \$1,590.60 of which \$1,417.50 are allocable to New Hampshire.

The Commission determined that none of the expenses associated with the New Hampshire Staff expenses discussed above are allocable. A summary of CA's New Hampshire expenses is shown below:

<u>Category</u>	<u>New Hampshire Allocable Amount</u>	<u>New Hampshire Non-Allocable Amount</u>
Events	\$ -0-	\$ -0-
Voter Lists	3,136.26	-0-
Telephone	1,381.03	842.13
NH Staff Expenses:		
Niemela/Russo	-0-	-0-
Jim Murphy	-0-	-0-
<b>TOTAL</b>	<u>\$4,517.29</u>	<u>\$ 842.13</u>

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The expenses discussed above indicate that CA engaged in activities in New Hampshire during 1986 and early 1987 which appear to be for the purpose of advancing Senator Dole's candidacy for nomination for the Office of President. The expenses show a staff presence, a series of political events and an effort to accumulate voter lists.

The Audit staff also learned that Campaign America had committees registered at the state level in both Iowa and New Hampshire. Though both the Interim Audit Report and the request made to CA asked for information on these committees, no information has been provided.

Presented below is an overall summary of the CA activity which is considered testing the waters.

	<u>State Allocable</u>	<u>Non State Allocable</u>
Iowa	\$33,889.32	\$ 7,998.50
New Hampshire	<u>4,517.29</u>	<u>842.13</u>
Total	<u>\$38,406.61</u>	<u>\$ 8,840.63</u>
Grand Total		<u>\$ 47,247.24</u>

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13. Recap of Iowa and New Hampshire Allocations

Presented below is a recap of allocable costs to Iowa and New Hampshire.

	<u>Iowa</u>	<u>New Hampshire</u>
Amount Allocated by the Committee	\$ 793,230.82	\$ 462,462.20
<hr/>		
Audit Additions:		
1. Twenty-Five Percent Fundraising Exemption (Travel, Events)	28,450.36	13,997.06
2. Fundraising Exemptions-Direct Mail Costs	51,935.78	43,618.56
3. Credit Card Phone Calls (Intra-state)	23,280.46	1,696.44
4. Phone Banks	-0-	-0-
5. NE Regional Office	-0-	54,341.62
6. Compliance Exemptions-Media Costs	16,061.46	13,961.15
7. Broadcast Media	2,595.98	37,295.89
8. Media Commissions (Production)	2,664.64	2,988.08
9. Travel and Salary Costs	73,161.62	66,349.25
10. Non-Travel and Salary Costs	35,179.99	31,085.16
11. Polling Expenses	21,497.25	31,636.50
12. "Testing-the-Waters" Expenditures Made by Campaign America	<u>33,889.32</u>	<u>4,517.29</u>
Total Allocable Amount	\$1,081,947.68	\$ 763,949.20
Less: Expenditure Limitation	<u>(775,217.60)</u>	<u>(461,000.00)</u>
Amount in Excess of of the Limitation	\$ <u>306,730.08</u>	\$ <u>302,949.20</u>

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As explained above, the Audit staff has determined that the Committee has exceeded the expenditure limitation in Iowa by \$306,730.08 and in New Hampshire by \$302,949.20 for a total of \$609,679.28. Shown below is the calculation of the amount repayable to the U.S. Treasury as a result of these expenditures in excess of the state limitations:

Amount in Excess of the State Expenditure Limitations	\$609,679.28
Times the Repayment Ratio from Finding III.A.	<u>.278907</u>
Repayment Amount	<u>\$170,043.82</u>

Recommendation #8

The Audit staff recommends that the Commission make an initial determination that \$170,043.82 is repayable to the United States Treasury pursuant to 26 U.S.C. 9038(b)(2).

Repayment Amount: \$170,043.82

D. Apparent Non-Qualified Campaign Expenses - Delegate Committees

Section 9038.2(b)(3) of Title 11 of the Code of Federal Regulations states that the Commission may determine that amount(s) spent by the candidate, the candidate's authorized committee(s), or agents were not documented in accordance with 11 C.F.R. §9033.11. The amount of any repayment sought under this section shall be determined by using the formula set forth in 11 C.F.R. §9038.2(b)(2)(iii).

Section 9033.11 of Title 11 of the Code of Federal Regulations states, in part, that each candidate shall have the burden of proving that disbursements made by the candidate or his authorized committee(s) are qualified campaign expenses. For disbursements in excess of \$200 to a payee the candidate shall present one of the following:

A receipted bill from the payee that states the purpose of the disbursement; a cancelled check negotiated by the payee and a bill, voucher or invoice generated by the payee stating the purpose of the disbursement, or a voucher or contemporaneous memorandum from the candidate or committee that states the purpose of the disbursement. Where neither a receipted bill nor supporting documentation as described previously is available, a cancelled check negotiated by the payee that states the purpose of the disbursement is required. Where a cancelled check stating purpose is not available the committee may present a check and collateral evidence to document the qualified campaign expense.

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Such collateral evidence may include, but is not limited to, evidence demonstrating that the expenditure is part of an identifiable program or project which is otherwise sufficiently documented or evidence that the disbursement is covered by a pre-established written campaign committee policy.

For all other disbursements the candidate shall present a cancelled check negotiated by the payee that states the identification of the payee, and the amount, date and purpose of the disbursement.

The Audit staff reviewed all available records and delegate committee disclosure reports pertaining to eighteen delegate committees apparently formed to support Senator Dole's campaign. Fifteen of these committees were located in Illinois and the remaining three were located in Maryland. Senator Dole authorized thirteen of these delegate committees on amendments to his Statement of Candidacy. Four of the five non-authorized delegate committees filed statements of organization with the FEC and listed the Committee as an affiliate.

During the review of disbursements made by the delegate committees, the Audit staff noted that \$46,821.90 in disbursements were not documented in accordance with 11 C.F.R. §9033.11.

At the exit conference the Committee Treasurer stated that he was still attempting to obtain the missing documentation from the delegate committees. A listing of the missing documentation was provided to the Committee during the fieldwork and again at the exit conference.

In the Interim Audit Report, the Audit staff recommended that the Committee submit documentation which demonstrated that the above expenditures are qualified campaign expenditures and absent such a demonstration, the Audit staff would recommend that the Commission make an initial determination that the Committee make a pro rata repayment of \$13,103.95 ( $\$46,821.90 \times .279868^{*/}$ ) to the United States Treasury pursuant to 26 U.S.C. §9038(b)(2).

In the Committee's response to the Interim Audit Report, the Treasurer states the following:

The problem is that the Illinois committees came at the end of our candidacy. The individuals "running" the committees went their various ways and with them went their records. I realize that this is not an excuse but I want to make it clear to the Commission that these committees were not used in anyway to skirt the limits but rather were used for their stated purpose of attempting to win delegates from

\*/ It should be noted that the repayment ratio was revised to .278907 subsequent to the Interim Audit Report.

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various congressional districts. The expenditures made by these committees were legitimate campaign expenditures. However, I realize that they do not become "qualified" campaign expenditures until there is some record. I ask the Commission to show leniency with regard to these committees and accept as much as possible of the expenses for which any kind of record exists.

The Committee's response includes the same incomplete delegate committee records provided to the Audit staff during the fieldwork. However, the auditors obtained most of the necessary records as a result of requests sent to the delegate committees or subpoenas sent to the banks where the delegate committees had maintained their accounts.

These requests were sent to the thirteen delegate committees authorized by the committee and one delegate committee not authorized but which noted on a bank confirmation statement that the Committee Treasurer was an authorized signatory on the bank account. Subpoenas were sent to the banks where these fourteen delegate committees had maintained their accounts.\*/

Based on the Audit staff's review of the subpoenaed records, we determined that \$13,470.04 in disbursements made by the fourteen delegate committees were still not documented in accordance with 11 C.F.R. §9033.11.

Recommendation #9

The Audit staff recommends that the Commission make an initial determination that \$3,756.89 (\$13,470.04 x .278907) is repayable to the United States Treasury pursuant to 26 U.S.C. 9038(b)(2).

Repayment Amount: \$3,756.89

E. Stale-Dated Committee Checks

Section 9038.6 of Title 11 of the Code of Federal Regulations states that if the Committee has checks outstanding to creditors or contributors that have not been cashed, the Committee shall notify the Commission of its efforts to locate the payees, if such efforts are necessary, and to encourage them to cash the outstanding checks. The Committee shall also submit a check for the total amount of such outstanding checks, payable to the United States Treasury.

The Audit staff reconciled the Committee's reported activity to its bank activity through September 30, 1988 and

\*/ Requests for records were not sent to the four non-authorized delegate committees.

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determined that the total amount of outstanding checks was \$201,142.82. A review of the Committee's bank statements and cancelled checks for the period 10/1/88-2/28/89 indicated that \$90,917.21 had been paid and \$460.82 had been rejected for stale dates by the bank leaving \$109,764.79 in outstanding checks. This outstanding check balance consisted of 214 checks.

Of these, 141 are contribution refund checks. The remaining are to individuals and vendors in payment for various obligations. It is recognized that some number of the non contribution refund checks may represent checks that were voided but for which no record of the voided checks was found.

In the Interim Audit Report, the Audit staff recommended that the Committee present evidence that:

- a) the checks were not outstanding (i.e., copies of the front and back of the negotiated checks); or
- b) the outstanding checks were voided (copies of the voided checks with evidence that no committee obligation exists, or copies of negotiated replacement checks); and
- c) the Committee attempted to locate the payees to encourage them to cash the outstanding checks.

The Audit staff added that they would review any information provided and would recommend that the Commission make an initial determination that any amounts which remain outstanding are payable to the United States Treasury.

In the Committee's response to the Interim Audit Report, they stated that they have voided a number of the outstanding checks and would like to review these with the Audit staff. The Audit staff met with the Committee to review the actions taken by the Committee regarding the stale-dated checks.

Based on this review, the Audit staff determined that the Committee has 178 checks, totaling \$71,733.23, which remain as outstanding. Included in this total are 142 contribution refunds\*/ and 36 payments to individuals and vendors for various obligations.

In summary, the Audit staff determined that as of September 30, 1988, the revised total amount of stale dated outstanding checks is \$71,733.23.

\*/ According to a Committee official, four of these contribution refunds, totaling \$2,446, were voided by the Committee because they were returned as undeliverable. These four items were reported as negatives on the Committee's disclosure reports.

730 / 1164 / 70

**Recommendation #10**

The Audit staff recommends that the Commission make an initial determination that \$71,733.23 be paid to the United States Treasury pursuant to 11 C.F.R. §9038.6.

Payment Amount: \$71,733.23

**F. Recap - Amounts Repayable to the United States Treasury**

Presented below is a recap of the amounts recommended by the Audit staff as subject to the repayment provisions of 26 U.S.C. §9038(b)(2) and 11 C.F.R. §9038.6.

Expenditures in Excess of the State Limitations (See Finding III.C.)	\$170,043.82
Non-Qualified Campaign Expenses - Delegate Committees (See Finding III.D.)	3,756.89
Outstanding Checks (See Finding III.E.)	71,733.23
<b>Total Recommended Repayment</b>	<b><u>\$245,533.94</u></b>

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Dole for President  
Schedule of Direct Costs (NE Region - States)  
SA-2/1  
3/11/82, MFG

	NH	MA	CT	ME	RI	VT	Total
Payroll:							
Salaries	176	315570	4373	0	5000	10	70110
FICA ('87-7.15%)	176	13391	0	0	10	0	13573
FICA ('88-7.51%)	0	1188	382	0	1500	0	16673
Total Salaries	0	370850	4701	0	2150	0	43332
Consultants	16313	74245	858	20236	9200	15249	99613
Total Payroll	16313	51330	13270	20236	8150	15249	123550
Payroll (Excluding NH)							
Overhead:	6251	2071	1572	4162	2478	12650	47890
Telephone (Intra-stats)							
Rent	766	1950	500	500	3250	3000	23665
Utilities	990	3724	0	207	1816	0	4491
Supplies	615	66121	776	1031	130	26813	16227
Equipment	1885	9864	7582	3302	392	25792	17933
Total O/H (Excluding NH)	15411	54052	3402	8370	7118	20592	110810
Total Payroll/Overhead	30854	107382	16672	28570	7868	35841	234360
Determined by Auditors							
\$2,900 for York Sugar							

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Dole for President Committee  
Audited New England Region Allocations

Account Code Name	Allocations as Determined by the Audit Staff					
	NH	MA	VT	ME	CT	RI
1. Political Events (w/o Sen.)		\$ 34.00				
2. Tour Events-NE	\$ (176.96)					
3. Inter-State Travel	9.85					
4. Salaries (Including FICA)	68,737.44					
5. Consultants	579.40	2,400.00	\$1,200.00			
6. Telephone (Non-Inter)	4,791.96					
7. Rent/Utilities	8,635.64					
8. Supplies	11,948.57	928.03	87.20	\$81.60	\$42.12	\$66.56
9. Equipment	45,994.29	3,283.84				
10. Postage/Printing	8,884.56	1,644.98				
11. Newsletter Expense	1,101.80					
<b>TOTAL</b>	<b>\$150,506.55</b>	<b>\$8,290.85</b>	<b>\$1,287.20</b>	<b>\$81.60</b>	<b>\$42.12</b>	<b>\$66.56</b>

\$9,768.33

MEMO

6/22/89

To: T. J. Lacy cc J.M.

From: A Walker

RE: Budget/Salaries - N.H.

Jim C - N.H. Exec Dir and Reg. Office Mgr

Salary 35,000 annual - 70% N.H. = 24,500 annual

30% Reg = 2,100 annual

charged to each Reg. state

X 10 months = \$2,042 per month N.H. = 20,420

X 11 months = 175 per month ea Reg. state

Suzanne N. - Reg. scheduler and Advance Coord.

Salary 22,000 annual - 40% N.H. = 8,800 annual

60% Reg. = 13,200 annual

charged to each Reg. state

X 10 months = \$734 per month N.H. = 7,333

X 11 months = 220 per month ea Reg. state

Ken Fredette - Reg Youth Goods

Salary 15,000 annual - 40% N.H. = 6,000 annual

60% Reg. = 9,000 annual

charged to each Reg. state

X 9 months = \$500 per month N.H. = 4,500

X 10 months = 150 per month ea Reg. state

137/016474

Paul Jacobson - Req. Press Sec. & Communications Dir.  
 Salary 35,000 annual - 40% NH = 14,000 annual  
 60% Reg = 21,000 annual  
 charged to each Reg. State (5)  
 X 7 months = 1,167 per month NH = 8,169  
 X 8 months = 250 per month ea Reg. State

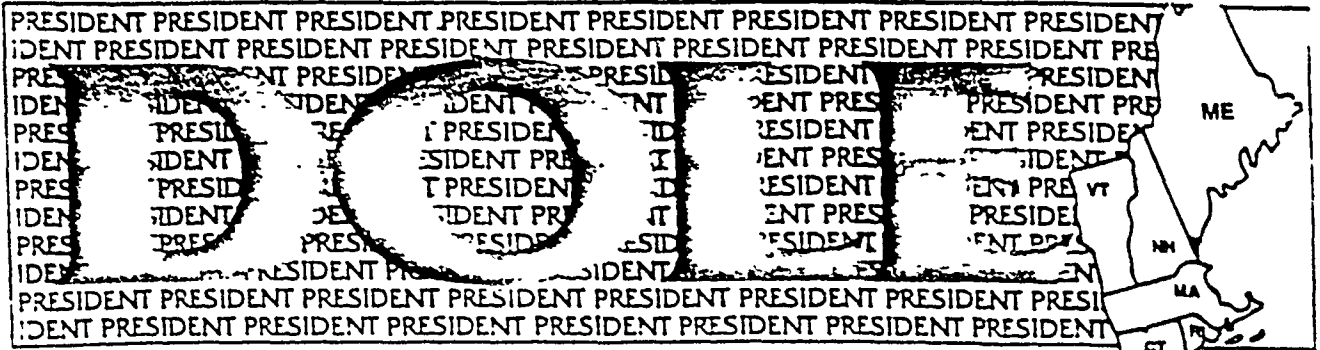
Req. Mgr. - Computer Ops. (To be hired)  
 Salary 20,000 annual - 40% NH = 8,000 annual  
 60% Reg = 12,000 annual  
 charged to each Reg. State (6)  
 X 8 months = 667 per month NH = 5,336 Tot  
 X 9 months = 200 per month ea Reg. State

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DOLE FOR PRESIDENT New England Region Newsletter

November, 1987

## 2,500 Cheer Dole Wildly at Manchester Announcement

More than 2,500 screaming supporters greeted Senator Bob Dole along with Mrs. Dole and Robin Dole, during a rousing announcement rally held November 9th in Manchester, N.H. The rally, dubbed an "almost flawless political event" by the state's largest newspaper surpassed the expectations of many political observers in New Hampshire.

"I feel it in the air. I feel victory in the air in the state of New Hampshire," Dole told the crowd.

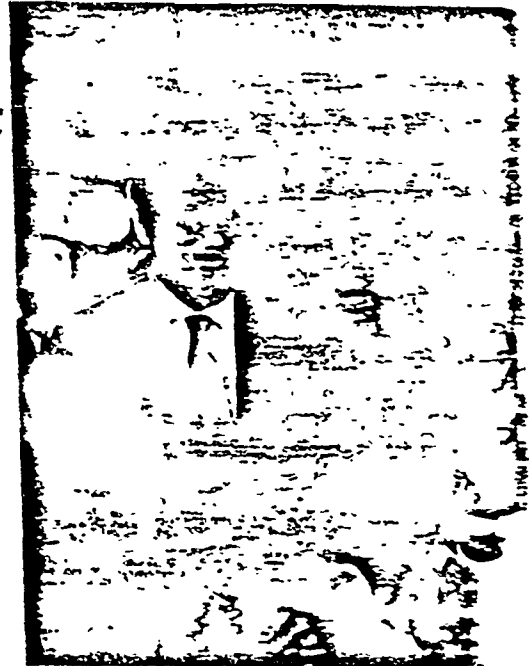
Dole was flanked on one side by hundreds of young people — members of the Youth for Dole organization in New England. On the other side of the

stage a bleacher section held 75 members of the 10th Mountain Division and their wives. Some of the former soldiers were attired in blue blazers and Alpine hats. Others wore white snow uniforms and carried skis and white rifles. Dole was seriously wounded in World War II while serving as a Second Lieutenant with the division in Italy.

During a 20-minute speech, marked several times by applause, Dole:

- Promised he would go after the federal budget deficit without raising income taxes.
- Pledged to continue his concern for the poor, handicapped and disabled.
- Called for merit pay for teachers.
- Vowed to defend the rights of the unborn.
- Promised to fight for a line item veto for the President.

Sen. Warren B. Rudman, R-N.H., received a loud round of applause when he said, "I don't think there's anyone in America for whom there's better odds that he'll be the 41st President of the United States."



Sen. Dole greeted by thousands as he enters Manchester, N.H. Rally, November 9th.

## New Campaign Video Ready for Home Viewing

The technology of the 1980's is being applied to the Dole for President campaign in the form of home video parties that will be held across the country in the coming weeks.

The national campaign has produced an affecting 20 minute film describing Senator Dole's life and

career. It shows why he can provide the common sense leadership this country will need in the 1990's.

We need you to hold a home video party during the month of November. To get involved, all you need is your TV/VCR, refreshments and some friends who are

interested in finding out about Bob Dole. The campaign will provide a complete support package, including the video.

If you are interested in hosting a Bob Dole video party, contact your Dole State Coordinator or the New England Regional Headquarters in Manchester, N.H.

## A Regional Approach to New England

"I felt the ground shake under my feet at my first contact with a New England Town Meeting." — Thomas Jefferson

Here in New England, we like to think of ourselves as a distinct region of the

country, symbolizing the spirit of the nation more absolutely than any other region. After all, at the beginning, New England was America.

Bob Dole knows

*continued, inside...*

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## A Regional Approach to New England, cont. . . .

about New Englanders. We share many values with Midwesterners — upright, fiercely independent, hard-working. That's why the Bob Dole campaign has taken a regional approach to New England.

Our regional headquarters is located at 852 Elm Street in Manchester, N.H. Allan Walker, former Chief of Staff to Sen. Warren B. Rudman, R-N.H., is regional field coordinator for New England. Allan is a native New Englander and has a great deal of political experience in this part of the country.

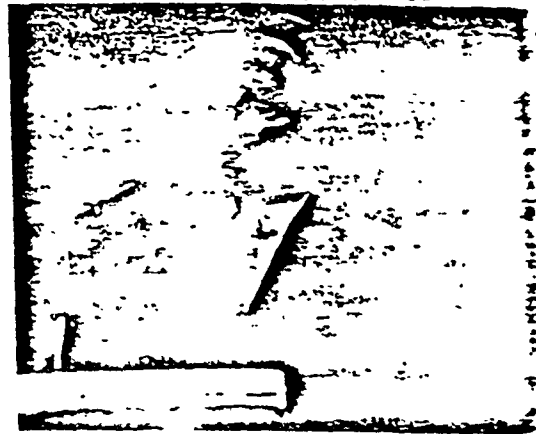
Each of the six states has an Executive Director. Backing

up these Executive Directors is a regional support staff based in Manchester that includes a Press Secretary, Youth Coordinator, and Scheduler/Advance Operations Coordinator.

The Senator and Mrs. Dole have not been left out of this regional approach. For obvious reasons they are spending a lot of time in New Hampshire. But they've also made recent stops in Burlington and Cabot, VT; Portland, Ogunquit, and Cape Elizabeth, ME; Windsor Locks, Stamford, and New Haven, CT; Warwick, R.I.; Boston, Peabody, Worcester, and Springfield, MA.

Mrs. Dole did her graduate work in Boston and skied New Hampshire's White Mountains during her graduate years. Sen. Dole has many New England supporters who are veterans of his Army unit, the 10th Mountain Division.

Aside from the obvious importance of New Hampshire on February 16, New England contains two "Super Tuesday" states — Massachusetts and Rhode Island. When Vermont holds its primary on March 1, it will stand alone as the only primary election that week — attracting significant national attention.



Sen. Dole addresses 2,500 enthusiastic supporters in Manchester.

## Talking About Bob Dole

Senator Bob Dole has been a strong and effective legislator for 27 years. He has led the fight and cast the tough votes in support of the Reagan economic reforms, the Gramm-Rudman deficit reduction legislation, aid to the Nicaraguan Freedom Fighters, and the President's Strategic Defense Initiative.

The Senator's background, his ability to overcome personal adversity, and his experience makes him

uniquely qualified to deal with the challenges facing Americans today.

Senator Dole has a strong record of conservatism in fiscal matters and foreign affairs, coupled with a record of compassion for the disabled and those less fortunate.

The Dole for President campaign is organized both in the key early states as well as nationally. Polls are showing support for the campaign's growth everywhere.

New Hampshire	February 16	Primary	23 delegates
Maine	February 28	Caucus	22 delegates
Vermont	March 1	Primary	17 delegates*
Massachusetts	March 8	Primary	52 delegates
Rhode Island	March 8	Primary	21 delegates
Connecticut	March 29	Primary	35 delegates

\* beauty contest

## A Triple Play . . . Dole . . . Brock . . . Wirthlin

Three big names have recently signed on with the Dole campaign at the national level.

### Elizabeth Dole

Elizabeth Dole gave up her position as Secretary of Transportation on September 30th so she could devote herself, full-time to Senator Dole's campaign.

Mrs. Dole kicked off her campaign for her husband with a swing through her native south that began on October 5th.

Speaking to a crowd in Knoxville, Tenn., Dole spoke of her husband's leadership positions in the Senate and his battle to overcome wounds he received in WW II.

"As you can see, I believe in him strongly, and that's why I gave up my full-time position," she told the crowd.

### William Brock

The Dole campaign grabbed another one of President Reagan's cabinet members with the enlistment of

Labor Secretary William Brock to be National Chairman of the Dole campaign. Brock is a former Senator from Tennessee and Chairman of the Republican National Committee.

Brock is a highly-respected manager. His departure from the Department of Labor promoted *The Washington Post* to dub the move a great gain for the Dole campaign and added, "Mr. Brock has served, not just the administration, but the country well."

Senator Dole, at a news conference announcing the Brock move, said, "Adding Bill Brock to our team is a major political coup. Besides being a close personal friend for many years, he is a political veteran in the south, one of the stars of the Reagan cabinet."

### Richard Wirthlin

President Reagan's long-time pollster, Richard Wirthlin, announced in late October that he was

joining the Dole team as its pollster.

"Bob Dole is the right man for our times. Americans in 1988 want a take-charge leader who gets results . . . He is the most electable Republican in the strong field of candidates," Wirthlin said.

Wirthlin and his associates have conducted more than 2,000 political studies. He has served as Chief Pollster for Republican presidential candidates in five previous contests.

# Leadership Announced in N.H. and Other States

## Rudman Endorses Dole

Saying "he has the strength and experience needed to lead this nation into the next decade," Senator Warren B. Rudman, R-N.H., recently endorsed Bob Dole for President.

At news conferences in Manchester, Portsmouth, Lebanon and Keene, N.H., Rudman indicated he believed Dole would be the "thoughtful, thorough and straight-talking leader this country needs as its next president."

"I'm thrilled to have the active support of someone as well-known and respected as Senator Rudman in New Hampshire," Dole said. "His visible assistance in New Hampshire and across the country will be a tremendous asset to our campaign," Dole added.

Rudman said he expected to spend most of his free time *10th Mt. Div. Alumni cheer Dole's official announcement.*

## Youth on the Move

Whether a football game or a political campaign, nothing matches the enthusiasm of college & HS students. Our NE Youth Coordinator, Ken Fredette, (Manchester, N.H.), has been organizing campuses, large & small, across New England.

Projects have included a blitzing of the Dartmouth/Univ. of NH football game, receiving the attention

in the coming months campaigning for Dole.

Several former Rudman staff members have been working for months on the Dole campaign in New England.

More than 250 Republican activists are part of the Bob Dole Advisory, Executive Finance and Steering Committees in New Hampshire. In addition to Sen. Warren B. Rudman (R-N.H.) as Honorary Chairman, the Dole effort in the Granite State is topped off by N.H. House Speaker, W. Douglas Scamman; former Governor Walter Peterson; Executive Councilor Peter Spaulding; State Treasurer Georgie Thomas, and former Congressman Perkins Bass.

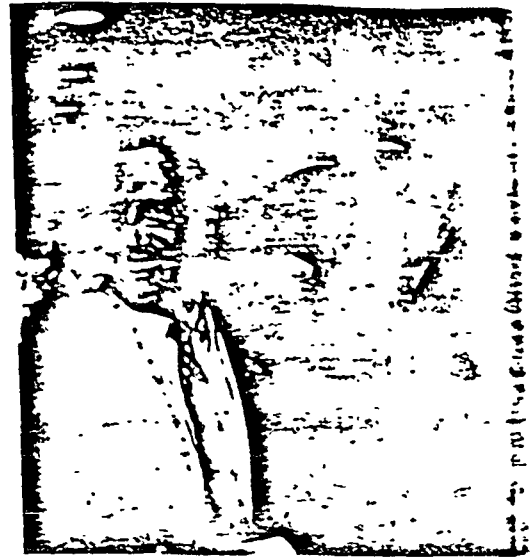
In Connecticut, the Dole campaign is co-

chaired by three long-time activists in Connecticut Republican politics. Former State Senate Minority Leader Richard C. Bozzuto, former Vice-Chairman of the State Republican Party, Betsee Osborne, and John Becker, former Republican Town Chairman of Greenwich are leading the Dole effort.

Ten state legislators are on the Dole team in Connecticut, as well as former Congressman Abner W. Sibal.

In Vermont, Senator Robert Stafford and former Governor Richard Snelling are honorary co-chairmen. House Minority Leader Michael Bernhardt, and State Representative Sarah Geer are working on the Dole team.

In Massachusetts, eleven state represen-



Senators Rudman and Dole greet Dole supporters at Manchester rally.

tatives a state senator and two members of the Republican State Committee are key players in a core advisory group. State Senator Peter Weber, Assistant House Minority Leader Kevin Polier, Rep. Peter Torkildsen, Rep. Ins Holland and State Committeeman Gil

Holland, among others, have been working hard for Senator Dole.

In Rhode Island, a 30 member Steering Committee that includes House Minority Whip Arthur M. Read II and former GOP Chairwoman Leila Mahoney is working with victory in mind on March 8th.

## Polls—Dole Closes on Bush...

Between Apr. '86 and Sept. '87, the Gallup Poll showed the margin narrowing from 32 to 21 points. TIME Magazine's poll showed the gap closing from 49 points in May '86 to 24 points in Aug. '87.

The Wall Street Journal/NBC News poll of Republican primary voters showed a gap of 33 points in Aug. '86. The same poll, a year later, showed a gap of only 1%.

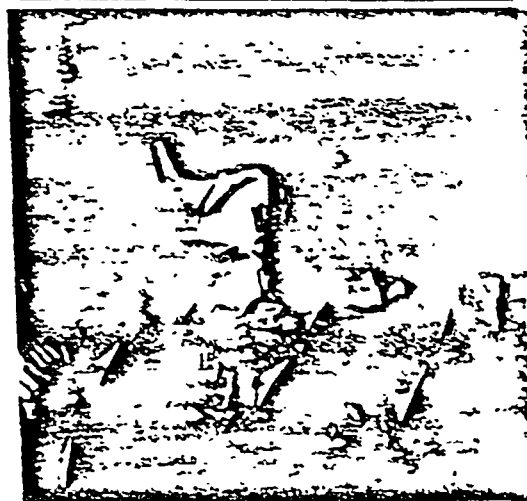
National polls consistently show a 2-way race. A June Harris Poll showed Dole with 27% and Bush with 31%. A recent CBS/New York Times poll shows Bush at 27% and Dole at 23%.

with other candidates at 10% or less.

### In Key Early States...

In the most recent Des Moines Register poll, Dole beats Bush 31% to 29% among likely caucus attendees.

In New Hampshire, a poll done for Sen. Rudman among Republicans who have voted in recent primaries, puts Bush at 37% and Dole at 22% — with no one else in double digits. When those polled were informed of Sen. Rudman's support for Senator Dole, the gap between Bush and Dole in New Hampshire closed to less than 10%.



of The NY Times.

Many students supplied their energy & support at Senator Dole's Leadership announcement in Aug.

If you know young people who would enjoy working on the campaign, they can write or call Ken Fredette.

### Finances — Look Good

The Dole campaign is making great progress in the area of fundraising. Dole raised money at a faster rate than any other candidate. Democrat or Republican during the normally-slow summer quarter Dole raised almost \$4 million from Jul. to Sept. That brings the total amount raised to approximately \$8 million. Funds are flowing in at a rate of

\$1.3 million a month and Senator Dole expects to raise the full \$14 million allowed by law.

Beyond this encouraging news are indications that the Bush campaign is spending money faster than Dole. As of early Oct., Bush had spent \$2 million more than Dole. Remember that all campaigns taking matching funds are subject to a national spending cap of \$27 million. Spending rates are important.

### Your Action Agenda

1. Set a goal of enlisting 5 - 10 Dole supporters each week.
  2. Give names & addresses to the local HQ or the NE Regional HQ in Manchester (603) 623-6680.
  3. Hold a home video party for Dole.
  4. Write a check to Dole for President Committee, 1828 L St., NW, Wash., DC 20036.
- Bob and Elizabeth Dole are counting on your active support.



89  
2  
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5



DOLE FOR PRESIDENT  
NEW ENGLAND HEADQUARTERS

852 ELM STREET  
MANCHESTER, NH 03101

Paid for by the DOLE FOR PRESIDENT Committee

### Where to Find Us ...

**New Hampshire — N.E. Regional Headquarters**  
852 Elm Street  
Manchester, N.H. 03102  
(603) 623-6680  
Jim Carroll,  
Executive Director

**Massachusetts**  
John St.  
Boston, MA 02116  
(617) 482-3822  
Bob Dawson,  
Executive Director

**Vermont**  
P.O. Box 687  
White River Junction, VT 05001  
(802) 457-1551  
Norman (Skip) Warts,  
Executive Director

**Connecticut**  
O.O. Box 3224  
Danvers, CT 06820  
(203) 232-5144  
Peter A. Michel,  
Executive Director

**Rhode Island**  
5600 Post Road  
East Greenwich, RI 02818  
(401) 558-4725  
Phil Rivers,  
Executive Director

**Maine**  
P.O. Box 189  
Augusta, ME 04330  
(207) 622-3899  
Norman (Skip) Warts,  
Executive Director

### From the Clipping File . . .

**Across the World-**  
"He fits the profile of the president whom many Americans, disillusioned after 11 years of two successive Washington outsiders, now say they want a competent wide-awake Washingtonian who knows his way about and will get things done." *The Economist, London England*

**Across the Country-**  
"In the 11 critical tests of strengths

before the onslaught of primaries on "Super Tuesday," next March 8, Dole is widely viewed as a competitor with the potential to win in six or more of the states holding primaries or caucuses from January 27 through March 5." *The Washington Post*

**Across New England-**  
"Dole would be the Republican Party's strongest candidate. He is a good public speaker, an expert-

enced debater and a master of one-liners." *Wm. V. Shannon, The Boston Globe*

"It looks as if the race for the Republican presidential nomination has already narrowed to two candidates — at least among Carroll County (N.H.) Republicans . . . Dole drew a large crowd of party activists during a Fourth of July visit to Wolfeboro." *Carroll County Independent (N.H.)*



CAMPAIGN AMERICA - REPORTED  
RECEIPTS AND DISBURSEMENTS BY YEAR

<u>YEAR</u>	<u>REPORTED RECEIPTS</u>	<u>REPORTED DISBURSEMENTS</u>	<u>CASH AS CALCULATED FROM COLUMNS 1 AND 2</u>
1978	\$ 205,096.00	\$ 197,395.00	\$ 7,701.00
1979	33,905.00	41,522.00	84.00
1980	13,500.00	13,188.00	396.00
1981	-0-	173.00	223.00
1982	285,356.00	251,934.00	33,645.00
1983	846,698.00	269,371.00	610,972.00
1984	426,219.00	585,767.00	451,424.00
1985	417,971.00	390,423.00	478,972.00
1986	2,929,341.00	2,859,148.00	549,165.00
1987	2,417,616.00	2,916,978.00*/	49,803.00
1988	<u>1,363,777.00</u>	<u>1,108,898.00</u>	304,682.00
<b>TOTAL</b>	<u><u>\$8,939,479.00</u></u>	<u><u>\$8,634,797.00</u></u>	

\*/ Of this amount, \$2,088,536.00 was expended between January 1, 1987 and April 30, 1987.

37 / 0164280

## MEMORANDUM FOR DON DEVINE

FROM: BILL LACY

DATE: AUGUST 8, 1986

SUBJ: IOWA '86 PROJECT

As you know, Iowa is a crucial state for the GOP.

1. Senator Grassley looks o.k., but Governor Branstad is in a fight for his life.
2. Because of the agricultural situation, Iowa has national significance-- heavy GOP losses there would code ill for realignment and would be a decisive setback for the President's farm policy.
3. Once a solid GOP state, Iowa is turning Democratic. Stopping the slide there in '86 could give us some ideas to apply to slipping GOP midwestern fortunes. To address these concerns, I would like to propose this concept for an Iowa '86 campaign assistance program:

Purpose: To assist Governor Branstad and other state and local candidates in Iowa by conducting a GO TV program featuring the Majority Leader.

Background: Midterm turnout is traditionally lower especially when the party in power faces serious economic problems. In 1982, economic circumstances led to large numbers of Republicans voicing their protest by not voting. Similar circumstances exist in Iowa in 1986 because of the farm economy; so it is critical to reach out to low-intensity voters.

Outline: Republican voters will be called, asked their position on state and local elections, whose endorsement would make them more likely to support the GOP candidates, queried about their attitude on farm policy, and finally, tested on their level of participation.

3070164/80

MEMORANDUM FOR DON DEVINE  
PAGE TWO

Low participation Republicans dissatisfied with farm policies who support the state and local GOP ticket will then be called. A message from Senator Dole urging them to turn out will be delivered. The target group will also receive a letter of endorsement.

In short, we'll use our resources in a carefully targeted way to elect more Republicans in Iowa.

Let me know what you think.

3770164982

PROPOSAL FOR  
MR. TOM SYNHORST

August 19, 1986

Objectives

1. To contact approximately 228,000 Iowans and determine whether the endorsement of each of seven prominent individuals is more or less likely to influence their supporting the Governor in the November election.

2. To record each person's attitude to the above mentioned questions and store this information for future telemarketing based on their response. Those showing a favorable response to a particular individual's endorsement will be recontacted within the final few weeks before the election.

3. To cost effectively provide high quality and accurate survey data that can be utilized throughout the project at the client's discretion.

4. A manual system of filing will be used as a back-up to the client's automated system.

5. The project will require a total of nine weeks to complete. the final two weeks before the election will be utilized to contact the people who responded favorably to a particular endorsement.

6. Lewis & Associates will have input and control over <sup>the</sup> design and layout of the telemarketing cards, as well as other variables affecting efficiency and performance.

Assumptions

The following assumptions are based on several years of experience in similar types of projects. Each figure is conservative and realistic: Lewis & Associates expects to exceed these figures through improvement of performance variables we can control. These assumptions will provide an excellent measure of the maximum time and cost involved to complete this project.

1. Approximately 15 contacts will be completed per telemarketing hour.

2. Approximately 17.5% of the people surveyed will need to be called back shortly before the election, cause they responded favorably to a particular endorsement.

3. The survey data will be entered into the master file by the client to enable those people who responded a particular way to be sorted, counted and later re-printed on cards for follow-up calls.

3370164283



Estimated Costs

The following estimates of the project's cost are based on the assumptions mentioned before. This estimate reflects the maximum cost per contact the client can incur on this project. If Lewis & Associates completes the project in less than the estimated hours, the client will only be charged for actual telemarketing hours rather than the estimated.

228,000	Original contacts
x 17.5%	Favorable response rate
39,900	Estimated follow-up contact required
228,000	Original contacts
+ 39,900	Follow-up contacts
267,900	Total estimated contacts required
+ 15	Contacts per hour
17,860	Telemarketing hours
x 27.50	Cost per telemarketing hour
\$491,150	Total estimated cost
\$ 27.50	Cost per telemarketing hour
+ 15	Contacts per telemarketing hour
\$ 1.83	Cost per contact

Schedule

August 25-29	Make final preparations for project
September 1	(Week #1) Begin project
September 8	(Week #2)
September 15	(Week #3)
September 22	(Week #4)
September 29	(Week #5)
October 6	(Week #6)
October 13	(Week #7)
October 20	(Week #8) Begin calling favorable responses
October 27	(Week #9) Complete calling favorable responses
November 3	(Week #10) Project completed
November 4	Election Day

The calling hours of the project will be 9:00 a.m. to 9:00 p.m. Monday through Sunday.

4 0 1 6 4 7 0 4

IOWA '86 PROGRAM ID SCRIPT

HELLO. MY NAME IS \_\_\_\_\_ AND I AM CALLING FROM CAMPAIGN  
AMERICA, A POLITICAL ACTION COMMITTEE. CAN YOU HEAR ME ALRIGHT?

1. WILL YOU BE SUPPORTING THE REPUBLICAN CANDIDATE FOR GOVERNOR,  
TERRY BRANSTAD, AND HIS STATE-WIDE TICKET?

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_ YES  
NO  
UNDECIDED

2. WILL YOU BE SUPPORTING \_\_\_\_\_, YOUR LOCAL REPUBLICAN  
CANDIDATE FOR THE LEGISLATURE?

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_ YES  
NO  
UNDECIDED

3. OF THE FOLLOWING LIST OF LEADERS, WHO'S ENDORSEMENT WOULD  
MAKE YOU MORE LIKELY TO VOTE FOR A CANDIDATE ON NOVEMBER 4TH?

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_ HOWARD BAKER  
GEORGE BUSH  
BOB DOLE  
JESSE HELMS  
JACK KEMP  
PAUL LAXALT  
BOB PACKWOOD  
PAT ROBERTSON

37 / 0164285

IOWA '86 PROGRAM ID SCRIPT  
PAGE TWO

4. WHICH OF THESE LEADER'S ENDORSEMENT WOULD HAVE THE NEXT MOST  
IMPACT ON YOUR DECISION TO VOTE NOVEMBER 4TH?

- \_\_\_\_\_ HOWARD BAKER
- \_\_\_\_\_ GEORGE BUSH
- \_\_\_\_\_ BOB DOLE
- \_\_\_\_\_ JESSE HELMS
- \_\_\_\_\_ JACK KEMP
- \_\_\_\_\_ PAUL LAXALT
- \_\_\_\_\_ BOB PACKWOOD
- \_\_\_\_\_ PAT ROBERTSON

5. ON AN IMPORTANT MATTER AFFECTING IOWA, DO YOU APPROVE OR  
DISAPPROVE OF THE JOB THE REAGAN ADMINISTRATION IS DOING ON  
FARM POLICY?

- \_\_\_\_\_ APPROVE
- \_\_\_\_\_ DISAPPROVE
- \_\_\_\_\_ NO OPINION

IS THAT STRONGLY OR SOMEWHAT (APPROVE) (DISAPPROVE)?

6. FINALLY, I WOULD LIKE TO ASK YOU WHICH OF THESE ACTIVITIES  
YOU PARTICIPATE IN:

- \_\_\_\_\_ GENERAL ELECTIONS
- \_\_\_\_\_ REPUBLICAN PRIMARIES
- \_\_\_\_\_ PRESIDENTIAL CAUCUSES
- \_\_\_\_\_ YOUR COUNTY'S REPUBLICAN CONVENTION
- \_\_\_\_\_ CONTRIBUTIONS TO REPUBLICAN CANDIDATES
- \_\_\_\_\_ VOLUNTEER FOR CANDIDATES

THANK YOU FOR YOUR TIME.

030 / 0164986

*Handwritten signature*

October 22, 1986

Dear Fellow Republican:

I am writing you today on a matter of urgent importance to Iowa.

Governor Terry Branstad needs your vote on Tuesday, November 4.

It is especially important that you and your family vote this election day. Many choose not to vote in midterm elections. This must not happen this critical year.

This makes your vote--and the vote of every member of your family--very critical.

Let me explain why. Governor Terry Branstad has been a tremendous ally of mine in the battle to make America's farmers competitive again. He's providing leadership to solve the problems of rural and small town America.

As the Senator of a midwestern agricultural state, I know firsthand of the struggles family farmers have faced in the last few years. Not all politicians have understood.

But Terry Branstad has. He's led the charge to improve your agricultural situation in Iowa and in the nation as well. As Senate Majority Leader, I have consulted with him on farm matters on more than one occasion.

The Governor is an effective voice for Iowa here in Washington, on agriculture and other issues. And that's important.

But I've also watched his efficient management of your state government--saving you, the taxpayer, millions of dollars. And he's worked to bring more jobs to Iowa.

Under the Governor's leadership, I see a bright future ahead for Iowa. Please make sure we don't lose that opportunity. Be sure to vote.

But don't stop there. Be sure to vote for the GOP ticket: [list statewide candidates]. And don't forget the Republican candidates for the State Senate and House. They'll be a crucial part of the Governor's efforts to get Iowa back on the right track.

2871616

Believe me, as Majority Leader of the United States Senate, I recognize the need for a team. Make sure the Governor can continue his efforts with a strong team backing him up.

Please vote for Terry Branstad on November 4, and for his team. It's so very important for Iowa.

Sincerely,

BOB DOLE

P.S. Your vote can make the difference. Be sure to get out and vote for Governor Branstad and his ticket on election day.

3070164788

DOLE FOR PRESIDENT  
Review of Campaign America Records -  
Telemarketing

Payee	Check #	Check Date	Iowa Allocable Amount	Commission Det'd Iowa Allocable Amount
<b>Levis &amp; Associates Telemarketing Inc.</b>				
	2945	10/14/86	\$ 19,305.00	-0-
	3265	11/03/86	42,120.00	-0-
	3476	12/02/86	9,195.90	-0-
	3310	11/06/86	238.75	-0-
<b>Total</b>			<u>\$ 70,859.65</u>	<u>-0-</u>
<b>Ed Nichols Associates</b>				
	3534	12/09/86	2,635.73	2,635.73
	3533	12/09/86	2,656.14	2,656.14
	3797	01/21/87	2,718.80	2,718.80
	3949	02/13/87	238.75	238.75
	4069	02/26/87	147.00	147.00
	4099	03/02/87	593.85	593.85
<b>Total</b>			<u>\$8,990.27</u>	<u>\$8,990.27</u>
<b>Follow-Up Letter</b>				
Tom Synhorst (Postage)	3132	10/28/86	5,950.00	-0-
U.S. Postmaster Des Moines	3086	10/23/86	1,300.00	-0-
MacDonald Letter Service	3123	10/27/86	2,683.52	-0-
ABC Mail Service	3122	10/27/86	1,015.00	-0-
ABC Mail Service	4146	03/11/86	143.46	-0-
<b>Follow-Up Letter Total</b>			<u>\$11,091.98</u>	<u>-0-</u>
<b>Telemarketing Program Total</b>			<u>\$90,941.90</u>	<u>\$8,990.27</u>

SENATOR BOB DOLE

ADDRESS TO THE IOWA BANKERS ASSOCIATION

FEBRUARY 7, 1987

I APPRECIATE THE OPPORTUNITY TO ADDRESS THE ANNUAL LUNCHEON OF THE IOWA BANKERS ASSOCIATION. [ SIOUX CITY IS ONE OF MY FAVORITE PLACES. IN FACT, LATELY, ANY PLACE IN OR NEAR IOWA IS ONE OF MY FAVORITE PLACES. ]

(BRACKETS ADDED)

AS MANY OF YOU KNOW, I HAVE SPOKEN TO MANY IOWANS DURING THE PAST FEW MONTHS. IT'S VERY EVIDENT THAT IOWANS HAVE THE SAME INTERESTS AND CONCERNS AS PEOPLE IN MY HOME STATE OF KANSAS -- THEY WANT TO KNOW HOW TO SURVIVE IN SOME TOUGH ECONOMIC TIMES. THEY WANT A PROSPEROUS NATIONAL ECONOMY, BUT THEY'RE ALSO CONCERNED ABOUT THE ECONOMIC WELL-BEING OF RURAL AMERICA.

SO I WILL BEGIN BY CONGRATULATING EACH OF YOU, BECAUSE AS THE COMMERCIAL LENDERS TO THE FARMERS AND SMALL-TOWN BUSINESSMEN AND WOMEN OF IOWA, YOU PLAY A CENTRAL ROLE IN KEEPING THE WHEELS OF IOWA'S ECONOMY TURNING. IT'S NOT AN EASY JOB, BUT IT IS A PARTNERSHIP THAT HAS ENDURED FOR MANY, MANY YEARS THROUGH THE BAD TIMES AS WELL AS THE GOOD.

1316490

A GRASS ROOTS APPROACH

I AM FIRMLY CONVINCED THAT IF WE ARE GOING TO SOLVE THE PROBLEMS FACING RURAL IOWA, RURAL NEBRASKA, RURAL KANSAS OR ANYWHERE ELSE IN RURAL AMERICA, THE ANSWERS ARE GOING TO HAVE TO COME FROM THE GRASS ROOTS AND NOT FROM POLITICIANS IN WASHINGTON D.C.

IN NOVEMBER, GOVERNOR BRANSTAD AND I ORGANIZED THE "REPUBLICAN TASK FORCE ON FARM AND RURAL AMERICA" WITH THE FIRST MEETING IN DES MOINES, IOWA, COMPOSED OF MIDWEST GOVERNORS, SENATORS AND CONGRESSMEN. WITH SEVERAL NEWLY-ELECTED MIDWESTERN GOVERNORS, WE FELT THAT REPUBLICANS HAD AN OPPORTUNITY AND A RESPONSIBILITY TO DEVELOP A CLOSER STATE AND NATIONAL RELATIONSHIP ON FOUR ISSUES IMPORTANT TO RURAL CITIZENS, ESPECIALLY IN THE MIDWEST: FARM POLICY, RURAL DEVELOPMENT, FARM CREDIT AND AGRICULTURAL TRADE AND EXPORTS.

IN ADDITION TO GOVERNOR BRANSTAD, SEVERAL MEMBERS OF THE IOWA DELEGATION WERE PRESENT: REPRESENTATIVES JAMES LEACH, JIM LIGHTFOOT, TOM TAUKE AND FRED GRANDY.

RURAL DEVELOPMENT

AFTER HOLDING MEETINGS IN DES MOINES AND CHICAGO, IT WAS THE TASK FORCE'S CONSENSUS THAT, WHILE THE FARM PROGRAM IS UNDOUBTEDLY A KEY FACTOR IN THE OVERALL RURAL ECONOMY, IT WILL



TAKE MORE THAN CHANGES IN BASIC FARM LEGISLATION TO TURN THINGS AROUND. WE HAVE EXPERIENCED THE EMOTIONAL ROLLER-COASTER OF HOPES AND DISAPPOINTMENTS WHEN WASHINGTON CONSIDERS NEW FARM BILLS. WHILE SOME IMPROVEMENTS ARE MADE, THEY ARE OFTEN TOO BROAD-BASED TO ADDRESS AND RESOLVE LOCAL PROBLEMS. MANY RURAL COMMUNITIES AND BUSINESSES ARE IN CRITICAL DANGER OF COLLAPSE NOW, AND WE NEED TO FOCUS ON WHAT CAN BE DONE THROUGH RURAL DEVELOPMENT PROGRAMS TO SUPPLEMENT WHAT WE DO WITH FARM PROGRAMS.

IN PARTICULAR, WE NEED TO FIND WAYS TO DIVERSIFY THE ECONOMIES OF FARM COMMUNITIES AND PROVIDE EDUCATION AND VOCATIONAL TRAINING OPPORTUNITIES FOR FARMERS AND OTHER RURAL CITIZENS. A NUMBER OF FARM STATES HAVE ALREADY DONE IMPORTANT WORK IN THESE AREAS. WE NEED TO BEGIN TO COORDINATE EFFORTS AT THE FEDERAL LEVEL WITH THE STATES AND PRIVATE ENTERPRISE AND MAKE SURE OUR BASIC COMMODITY PROGRAMS DOVETAIL WITH THESE BROADER INITIATIVES.

WE HAVE ALREADY STARTED IN THE SENATE ON SOME OF THESE ISSUES. DURING CONSIDERATION OF THE FEDERAL HIGHWAY BILL ON FEBRUARY 4, WE ADOPTED AN AMENDMENT BY SENATOR PRESSLER STATING THE FEDERAL GOVERNMENT MUST DO MORE TO ADDRESS THE SERIOUS PROBLEM OF DETERIORATING BUS SERVICE FOR RURAL AMERICA. WE MUST KEEP BASIC SERVICES IN RURAL AMERICA TO ATTRACT NEW BUSINESSES AND PROVIDE NEW JOBS AND GREATER ECONOMIC ACTIVITY.

RE-TRAINING FOR DISPLACED RURAL AMERICANS

I AM GOING TO MAKE A RECOMMENDATION REGARDING JOB RETRAINING PROVISIONS IN ANY NEW TRADE LEGISLATION CONSIDERED BY THE 100TH CONGRESS. THE ADMINISTRATION'S TRADE BILL CONTAINS NEARLY \$1 BILLION IN RE-TRAINING ASSISTANCE FOR WORKERS WHO HAVE LOST THEIR JOBS DUE TO INCREASED IMPORTS. CURRENTLY, 25 PERCENT OF ALL AMERICANS LIVE IN RURAL COMMUNITIES -- COMMUNITIES THAT FACE DIFFICULT ECONOMIC TIMES DUE TO A NUMBER OF FACTORS, INCLUDING A SIGNIFICANT DECLINE IN AGRICULTURAL EXPORTS AND A RISE IN AGRICULTURAL IMPORTS.

I MAY OFFER AN AMENDMENT DURING THIS YEAR'S TRADE DEBATE EARMARKING NOT LESS THAN 25 PERCENT OF ANY JOB RETRAINING FUNDS FOR WORKERS IN RURAL COMMUNITIES -- ALL THE WAY FROM FARMERS TO HARDWARE STORE WORKERS THAT HAVE BEEN AFFECTED BY THE AGRICULTURAL ECONOMY. ITS MY VIEW THAT IF 25 PERCENT OF ALL AMERICANS LIVE IN RURAL AREAS THEY OUGHT TO GET AT LEAST 25 PERCENT OF THE JOB RETRAINING ASSISTANCE.

FARM PROGRAMS

ANOTHER CONCERN OUR REPUBLICAN TASK FORCE ADDRESSED IS FARM CREDIT. PERSONALLY, I THINK MOST BANKERS WOULD SAY THEIR TWO GREATEST FEARS WOULD BE (1) A SHARP REDUCTION IN COMMODITY PROGRAM BENEFITS AND (2) THE COLLAPSE OF THE FARM CREDIT SYSTEM. THESE EVENTS COULD RESULT IN LOWER FARMLAND VALUES AND EXACERBATE THE FARM DEBT PROBLEM.

030/0164293

THE ADMINISTRATION HAS NOTIFIED CONGRESS THAT IT WANTS TO CHANGE THE 1985 FARM BILL. ONE PART OF THEIR LEGISLATIVE PACKAGE WOULD CUT TARGET PRICES BY TEN PERCENT PER YEAR FOR THREE YEARS. THIS WOULD REDUCE SPENDING ON FARM PROGRAMS BY ABOUT \$20 BILLION DURING FISCAL YEARS 1988-1992.

MY VIEW IS THAT OUR EFFORTS TO ADDRESS THE FEDERAL BUDGET DEFICITS MAY WELL REQUIRE SOME REDUCTIONS IN SPENDING FOR AGRICULTURAL PROGRAMS. WE ARE ALL FAMILIAR WITH THE FACT THAT FARM PROGRAM COSTS HAVE RISEN FROM AN ANNUAL AVERAGE OF \$3-\$4 BILLION IN THE LATE 1970'S TO \$25.8 BILLION LAST YEAR AND AN ESTIMATED \$25.2 BILLION IN FY-1987.

CONGRESS AND THE ADMINISTRATION SHOULD KEEP IN MIND, HOWEVER, THAT, TAKING INFLATION INTO ACCOUNT, THE FARM VALUE OF FOOD ACTUALLY FELL DURING THE PAST DECADE, AND THAT AMERICANS NOW USE ABOUT ONE-THIRD LESS OF THEIR DISPOSABLE INCOME FOR FOOD PURCHASES - SO FARMERS MAY BE RECEIVING MORE OF THEIR INCOME FROM THE GOVERNMENT, BUT THE REAL BENEFICIARIES ARE PEOPLE WHO EAT.

SO, I DON'T BELIEVE CONGRESS WILL APPROVE THE ADMINISTRATION'S TARGET PRICE CUTS -- OR ANY MAJOR FARM PROGRAM CHANGES UNLESS AND UNTIL WE SEE MEANINGFUL AND EQUITABLE ACTION ON BUDGET DEFICITS.

13 JUL 16 1984

FARM CREDIT

WE ALSO WANT TO ENSURE THAT AN ADEQUATE SUPPLY OF CREDIT AT REASONABLE RATES IS AVAILABLE TO FARMERS AND RURAL ENTERPRISES. THIS MEANS MAINTAINING THE VIABILITY OF THE COOPERATIVE FARM CREDIT SYSTEM. BUT IT ALSO MEANS THAT OUR EFFORTS TO ASSIST STRUGGLING FARMERS AND THE FARM CREDIT SYSTEM MUST NOT DRIVE COMMERCIAL LENDERS OUT OF THE FARM LOAN BUSINESS.

CHAPTER 12

I HAVE HEARD FROM A NUMBER OF FARM BANKERS IN MY STATE WHO HAVE CONCERNS ABOUT THE NEW CHAPTER 12 LEGISLATION, SPONSORED BY IOWA'S SENIOR SENATOR, CHUCK GRASSLEY. THEY PARTICULARLY QUESTION THE "ADEQUATE PROTECTION" PROVISIONS, WHICH ALLOW A DEBTOR TO STAY IN BUSINESS BY WRITING DOWN FARMLAND DEBT TO ITS CURRENT VALUE.

TO DATE THERE HAS BEEN NO RUSH TO THE BANKRUPTCY COURTS SINCE ENACTMENT OF CHAPTER 12. AS OF JANUARY 22, THERE WERE ONLY 357 FILINGS IN THE 8TH CIRCUIT, WHICH INCLUDES IOWA AND SIX OTHER KEY FARM STATES. THE LIMITED USE OF THE NEW CHAPTER 12 APPEARS TO BE THE NEW TAX REFORM BILL, WHICH ENCOURAGES FARMERS WITH SERIOUS FINANCIAL PROBLEMS TO WRITE DOWN LOSSES INSTEAD OF FILING FOR BANKRUPTCY.

130 / 0164296

I SUGGEST WE SHOULD GIVE SENATOR GRASSLEY'S LEGISLATION A FAIR CHANCE TO WORK. CONGRESS WILL BE WATCHING CLOSELY TO SEE WHAT THE REPERCUSSIONS ON FARM LENDING WILL BE. IF SIGNIFICANT PROBLEMS ARISE AND CREDIT THREATENS TO DRY UP, WE ARE PREPARED TO MAKE THE NECESSARY CORRECTIONS.

SECONDARY MARKET

I UNDERSTAND A TASK FORCE HAS BEEN MEETING ON THE SO-CALLED "SECONDARY MARKET" CONCEPT COMPOSED OF THE FARM CREDIT SYSTEM, THE INDEPENDENT BANKERS, THE AMERICAN BANKERS AND INSURANCE COMPANY REPRESENTATIVES. SENATOR GRASSLEY HAS INTRODUCED LEGISLATION TO CREATE A SECONDARY MARKET AS A MEANS OF INCREASING THE AVAILABILITY OF FUNDS FOR FARM LENDING.

THE IDEA OF PACKAGING LONG-TERM FARM LOANS AND MARKETING THEM THROUGH AN ENTITY THAT HAS AGENCY STATUS AND ACCESS TO THE BOND MARKETS -- EITHER THROUGH THE FARM CREDIT SYSTEM OR THROUGH A "FARMER MAC" OR AN "AGGIE MAE" -- IS AN INTRIGUING IDEA THAT DESERVES CLOSE EXAMINATION, ESPECIALLY IF IT COULD BRING MORE CAPITAL TO RURAL COMMUNITIES AND COULD OFFER FARMERS LOWER INTEREST RATES ON REAL ESTATE LOANS.

I THINK THERE SHOULD BE A FULL DISCUSSION OF THIS CONCEPT AND HOW IT MAY BE PART OF OUR OVERALL APPROACH TO THE FARM CREDIT SITUATION THIS YEAR. I ENCOURAGE COMMERCIAL LENDERS TO WORK WITH THE FARM CREDIT SYSTEM AND OTHERS AND CONTINUE TO EXPLORE WHAT MAY PROVE TO BE A VERY USEFUL LENDING TOOL.

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PROPOSED COMMITTEE HEARINGS

RECENTLY THERE HAVE BEEN QUITE A FEW PRESS REPORTS CONCERNING THE FINANCIAL CONDITION OF THE FARM CREDIT SYSTEM. CONGRESS HAS COME TO THE AID OF THE SYSTEM TWICE WITHIN THE LAST 18 MONTHS, PASSING LEGISLATION TO PROVIDE BASIC GUIDELINES FOR REFORMS AND GIVING THE SYSTEM AND ITS BORROWERS MORE FLEXIBILITY IN DEALING WITH THEIR PROBLEMS. THERE ARE MANY WHO SAY THE SYSTEM WILL NEED SOME FEDERAL FINANCIAL ASSISTANCE SOMETIME THIS YEAR UNDER THE 1985 CREDIT ACT. THERE ARE MANY WHO FEEL THE SYSTEM COULD BE MORE CANDID ABOUT THE EXTENT OF ITS DIFFICULTIES AND THE TIMELINESS OF INITIATING A NEW DEBATE ON FURTHER REFORMS AND RESTRUCTURING.

I HAVE WRITTEN SENATOR LEAHY AND SENATOR LUGAR ASKING THE SENATE AGRICULTURE COMMITTEE TO CONDUCT A FULL DAY OF HEARINGS TO INVESTIGATE THE FINANCIAL STATUS OF THE FARM CREDIT SYSTEM AS WELL AS OTHER AGRICULTURAL LENDERS. SUCH A HEARING WOULD PROVIDE AN OPPORTUNITY TO RECEIVE RECOMMENDATIONS FROM THE FARM CREDIT ADMINISTRATION, THE FARM CREDIT SYSTEM AND FROM COMMERCIAL AGRICULTURAL LENDERS REGARDING MEASURES THAT MAY BE NECESSARY TO ENSURE OUR FARMERS HAVE ACCESS TO AN ADEQUATE SUPPLY OF CREDIT AT REASONABLE RATES.

I DON'T WANT TO BE CAUGHT WITH EVERYONE COMING TO CONGRESS AND SAYING THAT THE SYSTEM NEEDS ASSISTANCE WITHIN A WEEK. THIS IS AN ISSUE THAT DOES NOT NEED TO SURPRISE ANY OF US, SO WHY NOT START NOW TO THINK ABOUT THE VIRTUES AND DRAWBACKS OF ANY ALTERNATIVES TO HELP THE SYSTEM THROUGH TOUGH TIMES. CONGRESS IS

GETTING TIRED OF PASSING LEGISLATION THAT EVERYONE SAYS WILL  
"SAVE THE FARM CREDIT SYSTEM" -- ONLY TO FIND OUT THREE MONTHS  
LATER THAT THE PROBLEM STILL EXISTS.

CONCLUSION

NOT LONG AGO, I SPOKE TO YOUR STATE SHERIFFS' ASSOCIATION  
ABOUT SOME OF THE ISSUES IMPORTANT TO THEIR MEMBERS AND TO IOWA.  
AGRICULTURE WAS AT THE TOP OF THE LIST.

THERE PROBABLY WASN'T A SHERIFF IN THE ROOM WHO HAD NOT FELT  
THE EFFECTS OF THE DEPRESSED FARM ECONOMY. AND THE EFFECTS ARE  
VERY REAL, FOR IT IS THE SHERIFF OR A DEPUTY SHERIFF WHO TAKES  
THAT LONG DRIVE UP A FARMER'S LANE TO DELIVER A FORECLOSURE OR  
EVICTION NOTICE.

LIKE THOSE SHERIFFS, YOU ALSO KNOW THE PROBLEMS OUR RURAL  
ECONOMY FACES. AND I DOUBT THERE IS A PERSON IN THIS ROOM WHO  
HASN'T FELT THE PAIN OF TURNING DOWN A FARMER - PERHAPS A  
NEIGHBOR OR A FRIEND YOU'VE KNOWN FOR YEARS - WHO WAS LOOKING FOR  
A LITTLE BREATHING ROOM, A SECOND CHANCE, A NEW HOPE FOR THE  
FUTURE.

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BUT WHEN FARMERS ARE IN TROUBLE, YOUR BUSINESS - THE BUSINESS OF BANKING - IS ALSO IN TROUBLE. 1986 SAW RECORD LOSSES FOR IOWA BANKS, ATTRIBUTABLE IN LARGE PART TO THE STATE'S DEPENDENCY ON AN AGRICULTURE-BASED ECONOMY. BUT THERE MAY BE SOME GOOD NEWS AROUND THE CORNER.

I KNOW THAT YOUR STATE BANKING COMMISSIONER IS PREDICTING FEWER BANK CLOSURES IN IOWA THIS YEAR. AND IN WASHINGTON, WE'RE LOOKING FOR BETTER WAYS TO HELP BOTH THE FARMER AND THE BANKER.

NOW SOME WOULD SAY THAT WE IN WASHINGTON MUST PROVIDE ALL THE SOLUTIONS. AND WE OFTEN TRY. BUT, AS I'VE SAID MANY TIMES BEFORE, WE IN CONGRESS CANNOT GUARANTEE THAT EVERYONE IN OUR SOCIETY SUCCEEDS. ALL WE CAN DO IS STRIVE TO PROVIDE THE RIGHT KIND OF ENVIRONMENT WHERE PEOPLE HAVE THE OPPORTUNITY TO SUCCEED - BUT WE CANNOT GUARANTEE SUCCESS.

BUT IF WE WORK TOGETHER, PERHAPS WE CAN MAKE 1987 A BEGINNING FOR MORE SUCCESSFUL TIMES IN AGRICULTURE. I LOOK FORWARD TO WORKING WITH YOU.

13170164299



## BEVERLY HUBBLE TAUKE

400 "O" Street S.W. #203  
Washington D.C. 20024  
(202) 484-7134

TO: SENATOR DOLE

FEBRUARY 13, 1987

FROM: BHT

RE: IOWA TALKING POINTS

### QUAD CITIES ISSUES

\* CATERPILLAR PLANT CLOSING: As confirmed in February 17 announcement, wipes out 1,300 jobs despite plant's track record as most productive CAT plant in USA; its demise due to LOSS OF FOREIGN MARKETS. Plant will phase out during late 1987, 1988.

(TIE TO DOLE TRADE AGENDA TO PROTECT IOWA AND U.S. JOBS... As proven by Dole battles against unfair Canadian pork imports and unfair ethanol imports (mostly Brazil), Bob Dole is committed to enforce U.S. trade laws, and demand free but FAIR TRADE.

ALSO USEFUL HERE: Other Dole initiatives re: strong dollar, aggressive pursuit of international markets, erosion of federal red tape/barriers to strong trade.)

\* MISSISSIPPI RIVER PROJECT: Officials in area are pushing number of proposed projects (but not in total agreement) including:

- \* Possible use of old Case building outside Davenport as a museum or tourist center, enhancing river area appeal to tourists.
- \* Bi-State commission urging construction of new bridge--old one viewed as severely inadequate link between Iowa-Illinois.
- \* Riverboat gambling to attract more business.
- \* New levies - could include federal funds if cities match funding.
- \* River seen as centerpiece of long-range (20-year) development plan promoted by local media to unite Quad Cities more as single community; would include removal of commercial properties along river.
- \* These proposals have not really moved past promotion stage.

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IOWA TALKING POINTS

SUPPORT FOR IOWA FARMERS

- UNFAIR CANADIAN PORK IMPORTS: Dole/Grassley initiative led to PUNITIVE DUTIES for Canadians dumping pork unfairly on U.S., with enormous stakes for Iowa.
- UNFAIR ETHANOL IMPORTS: Dole battles vs. unfair ethanol imports, severely jeopardizing cornrowers & corn-based ethanol industry, at great risk to Iowa. Such battles have stymied ethanol imports, saving U.S. ag economy about \$900 million in late '85 - early '86 alone, according to ethanol industry.
- BILL TO ADVANCE SPRING PAYMENTS, Dole-backed, would mean 725m - 750 million early dollars to Iowa farmers.
- SOIL TILTH CENTER, IOWA STATE UNIVERSITY - Dole, supporting C.Grassley, engineered restoration of \$11.1 MILLION to ISU for research crucial in battle for U.S. agriculture to compete effectively in global markets. Study of new growth options, new uses of U.S. food and fiber....to sustain the 7 out of 10 Iowa jobs now dependent on agriculture.
- 1985 FARM BILL: Suggest keeping this tight with few key points:
  - (1) No bill would please all farmers.
  - (2) Under REPUBLICAN-SHAPED programs of past FIVE YEARS (1982-1986), MORE WAS SPENT ON AGRICULTURE (\$104 BILLION estimate as of last Spring) than was spent on agriculture during prior 18 YEARS! If commitment to American farmers is measured by dollars, the fact is that the REPUBLICAN SENATE delivered far greater support to agriculture than previously offered under Democratic control.
  - (3) Suggest emphasis on achievements of farm program, light acknowledgment of inevitable inadequacies, but no need to use extensive remarks to defend Farm Bill. Sounds too defensive.

TAX REFORM

- WINNING OVERWHELMING BIPARTISAN SUPPORT FROM 97 SENATORS, Republican-controlled Senate last year led way to most sweeping tax reform in 40 years.
  - "I'm sorry our party didn't put it in our 1984 platform," groused Democratic presidential hopeful Gary Hart, "but it got away from us and it's theirs now." (Washington Post).
  - No wonder Democrats cringed at Republican-led reforms. Through that historic overhaul, Republicans:
    - o Assured LOWER RATES for about 80% of all U.S. taxpayers.
    - o Eliminated about 6 MILLION POOR from the tax rolls.

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o Reduced the top rate of 27% lower than at any time since 1931.

• INCOME TAX INDEXING, engineered by Republicans, assured PRIMARY RELIEF TO WOMEN AND MINORITIES. (Concentrated relief for low-income taxpayers who move up narrow tax brackets faster.)

TAX REFORM, Cont'd

• DEMOCRATS MAY WIN THE RHETORIC BATTLE - but it's REPUBLICANS WHO HAVE DELIVERED TAX RELIEF to the very "workers, women, minorities and poor" for whom Democrats too often claim exclusive concern.

• NEW CHALLENGE: TO BEAT BACK INEVITABLE DEMOCRATIC ATTEMPTS TO STRIP AWAY THOSE HARD-WON TAX BREAKS! Democrat-controlled House has already rejected efforts to protect tax relief from early erosion. DOLE RESOLUTION seeks to put Senators on record AGAINST ANY INCOME TAX INCREASE THIS YEAR. American workers won substantial tax relief under the DOLE WATCH, and I'm now making TAX RELIEF PRESERVATION a top priority on the Republican agenda.

BALANCED BUDGET

• IN MY (DOLE) CRUSADE FOR BALANCED BUDGET AMENDMENT, I've traveled to Michigan & elsewhere to lobby legislators.... 32 states have adopted resolutions urging constitutional amendment limiting taxes and requiring a balanced federal budget. I'M COMMITTED TO A BALANCED BUDGET AMENDMENT.

• SENATE BUDGET VOTE IN 1985 TO ELIMINATE 13 FEDERAL PROGRAMS, & restrict spending in hundreds of other programs was a major victory towards budget restraint....FOILED ONLY WHEN THE HOUSE BALKED!

• GRAM-RUDOMAN has been useful in moving U.S. towards budget control. But a statute can be modified, postponed, or amended by a simple majority...which is why we need the Constitutional amendment to force Congress to fiscal responsibility.

WOMEN'S ISSUES

• PENSION REFORM: Dole-backed legislation gave YOUNG WOMEN the right to qualify earlier for pension programs, and guaranteed OLDER WOMEN a share of their spouse's retirement income. (Because highest percentage of women work during early twenties, exclusion of those workers from pension accrual proved a greater liability to female than male workers).

• CHILD SUPPORT ENFORCEMENT: Dole-backed legislation now allows state and federal governments to WITHHOLD TAX REFUNDS from parents (most often fathers) delinquent on child support payments. Such child-support enforcement crucial to relieve enormous economic pressure often confronting women who head households.

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- \* DISCRIMINATORY LAWS: A Dole proposal would not allow federal funds for enforcement of laws with gender-based distinctions.

MINORITY RIGHTS

- \* VOTING RIGHTS ACT: (Briefly explain stakes for black voters in some U.S. communities)... Dole led Republican support WITHOUT WHICH minority voters in some U.S. communities would have LOST legal protection essential to guarantee their basic Constitutional rights.

MINORITY RIGHTS, Cont'd

- \* MARTIN LUTHER KING HOLIDAY: Floor leader to navigate legislation through Senate. Message to black Americans: The Party of Abraham Lincoln REMAINS home of MANY OF US deeply committed to full freedom, rights, of all Americans. (Note: Despite Iowa's minuscule minority population, Iowans of all stripes are generally supportive or at least not antagonistic to this type social issue.)

NOTE: GENERAL OBJECTIVES OF IOWA TALKING POINTS

- \* ADDRESS VALUES IMPORTANT TO IOWANS: Initiatives on agricultural generally, pork/corn specifically, tie RJD to Iowa's best interests far more tightly than possible with any other Republican hopeful, possibly than any Democrat.

- \* OFFER IOWANS A FRIEND IN THE WHITE HOUSE: If candidates are confronted with question: How should your PAST commitments assure Iowans that if you are elected Iowa will have a friend in the White House.... It's likely NO ONE could answer that challenge as effectively as RFD. So we should make sure the question is asked...and asked...and asked. (Using past as barometer of future) <Useful in other farm states as well, for that matter....>

(BRACKETS ADDED)

- \* DEFINE BOB DOLE WITH ECONOMICALLY CONSERVATIVE AND COMPASSIONATE SUBSTANCE: A too-rare combination, but VERY APPEALING to Iowans. Stress the balanced-budget, tax control substance without wearing out the "conservative" term; But also stress important Dole battles for women, poor, minorities, handicapped for the conservative-with-a-heart package reflecting Iowa values.

- \* WOMEN/MINORITY RIGHTS included here primarily because those issues were raised in prior Iowa town meetings. Some settings may not warrant such emphases, but the solid DORE RECORD should be cited when issues raised:

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DOLE FOR JENT  
REVIEW OF CAMPAIGN AMERICA PAC RECORDS  
SCHEDULE OF EVENTS AND MEETINGS HELD IN IOWA BETWEEN 3/31/86-2/23/87

(SEE EXPLANATION OF COLUMN HEADINGS ON PAGE 10 OF 10)

## EVENTS:

DESCRIPTION OF EVENT/ DATE OF EVENT/ PAYEE	CHECK # & CHECK DATE	IOWA ALLOCABLE AMT	IOWA TRVL-NON ALLOCABLE	OTHER EXPENSES	MEMO ENTRY EXPS	ATTENDEES & EVENT
<b>3/31/86-4/01/86</b>						<b>ATTENDEES:</b>
<b>MEETING HELD AT HOTEL DSM</b>						<b>SENATOR DOLE</b>
HOTEL FORT DSM	1898/4-24	140.19				<b>TOM SYNHORST</b>
EXECUTIVE AIR TRAVEL	1892/4-24	1,294.50	5,959.15			<b>H GLASSNER</b>
FLOYD BROWN	1805/4-07				254.40	<b>D DEVINE</b>
INTERNATIONAL TOURS ALEXANDRIA	1775/4-01					<b>F BROWN</b>
FLOYD BROWN	"				290.00	<b>T SOUCY-ROCK ISLAND, NEAR DAVENPORT</b>
ROBERT WALLACE	1929/3-31	36.00				
ROBERT WALLACE	1951/3-31	6.00				
TOM SOUCY	1811/4-00	345.64				
<b>SUBTOTALS:</b>		<b>1,822.41</b>	<b>5,959.15</b>		<b>544.40</b>	
<b>4/04/86-4/05/86</b>						<b>ATTENDEES:</b>
<b>EVENTS &amp; MEETINGS THROUGHOUT IOWA</b>						<b>SENATOR DOLE</b>
EXECUTIVE JET AVIATION	1892/4-24	513.72	4726.23			<b>FLOYD BROWN</b>
INTERNATIONAL TOURS ALEXANDRIA	1804/4-21					<b>JOE BARRETT</b>
FLOYD BROWN	"				285.00	<b>DONALD DEVINE</b>
JOE BARRETT	1814/4-0	193.38		226.68	160.57	
JOE BARRETT	1703					
INTERNATIONAL TOURS ALEXANDRIA	1775/4-01					
DONALD DEVINE	"		224.00			
<b>SUBTOTALS:</b>		<b>707.10</b>	<b>4,950.23</b>	<b>226.68</b>	<b>453.57</b>	
<b>4/18/86</b>						<b>ATTENDEES:</b>
<b>AN EVENT AT WAPALLO IOWA &amp; A REPUBLICAN DINNER @ DSM 4-24-86</b>						<b>F BROWN</b>
IOWA DINING	1856/4-10	1,396.82				<b>J REHMAN</b>
VFW POST 5166	1857/4-10	275.00				
PAT PARSONS	1858/4-10	286.01				
C NICKLIN	1859/4-10	18.59				
R GERST	1860/4-10	284.00				
FLOYD BROWN	1905/4-29				989.37	
JOHN REHMAN	2152/6-16				334.22	
<b>SUBTOTALS:</b>		<b>2,181.22</b>			<b>1,323.59</b>	

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DESCRIPTION OF EVENT/ DATE OF EVENT/ PAYEE	CHECK # & CHECK DATE	IOWA ALLOCABLE AMT	IOWA TRVL-NON ALLOCABLE	OTHER EXPENSES	MEMO ENTRY EXPS	ATTENDEES & EVENT
<b>4-30-86/5-03-86</b>						
<b>IOWA CONGRESSIONAL DISTRICT CONVENTIONS</b>						<b>ATTENDEES:</b>
ROBERT VANESSE	1962/5-06	329.78				SENATOR DOLE
ROBERT VANESSE	1972/5-09	274.04	200.93			PAUL RUSSO
WARREN SWEENEY	2373/7-25	254.47	4.00	50.67		M GLASSNER
HOTEL FORT DSM FOR:	2042/5-27					W SWEENEY
ROBERT VANESSE	"	726.03				R VANASSE
SENATOR DOLE	"	141.65				S SEGO
PAUL RUSSO	"	116.95				F BROWN
MIKE GLASSNER	"	49.53				J BARRETT
WARREN SWEENEY	"	30.05				B BERRY
JOE BARRETT	"	70.20				
STEVE SEGO	"	205.49				
FLOYD BROWN	"				445.90	
JOE BARRETT	1009/4-22	197.36		206.29		
JOE BARRETT	1976/5-09					
BRIAN BERRY	1945/5-05	332.00				
FLOYD BROWN	1984/5-14				675.90	
STEVE SEGO	1930/5-05	61.79				
FLOYD BROWN	2425/8-05				250.94	
TIBBEN FLIGHTS	1970/5-14	1,451.52				
<b>SUBTOTALS:</b>		<b>4,330.54</b>	<b>204.93</b>	<b>256.96</b>	<b>1,380.74</b>	
<b>6/20/86-6/21/86</b>						
<b>IOWA GOP CONVENTION</b>						<b>ATTENDEES:</b>
FLOYD BROWN	2203/6-25				339.14	SENATOR DOLE
BRENT BANLER	2221/6-27	3.20	297.50			J VOIGHTS
HOTEL FORT DSM FOR:	2277/7-03					F BROWN
JANE VOIGHTS	"				176.06	D DEVINE
HARRIOT HOTEL	2276/7-03	156.00				
FRED DOWIE	2275/7-03	63.34				
CITY OF DES MOINES	2270/7-03	50.00				
ALEXANDERS PHOTO SERVICE	2291/7-07	340.74				
"	2323/7-17	34.32				
CONAGRE, INC	2733/9-10		933.00			
ALEXANDRIA TRAVEL SERVICE FOR:	2191/6-23					
DONALD DEVINE	"		232.00			
INTERNATIONAL TOURS ALEXANDRIA	2261/7-02					
FLOYD BROWN	"				464.00	
<b>SUBTOTALS:</b>		<b>647.60</b>	<b>1,462.50</b>		<b>979.20</b>	

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DESCRIPTION OF EVENT/ DATE OF EVENT/ PAGE	CHECK # & CHECK DATE	IOWA ALLOCABLE AMT	IOWA TRVL-NON ALLOCABLE	OTHER EXPENSES	MEMO ENTRY EXPS	ATTENDEES & EVENT
-----						
7/25/86-7/26/86 5TH DISTRICT REPUBLICAN EVENT -- ATLANTIC IOWA						ATTENDEES: JOHN RENNHAN SENATOR DOLE
-----						
J RENNHAN	3335/11-11				475.18	
SUBTOTALS:			0	0	475.18	
-----						
8/03/86-8/04/86 MEETING @ HOTEL DSM						ATTENDEES: SEN DOLE F BROWN B LACY D DEVINE M GLASSNER JANE VOIGHTS
-----						
FLOYD BROWN	2506/8-19				65.56	
HOTEL FORT DSM	2607/8-14				105.14	
HOTEL FORT DSM	2407/8-14					
HOTEL FORT DSM FOR: JANE VOIGHTS	2405/8-14 "				93.06	
PRATT AUDIO VISUAL	2404/8-14	29.83				
BURLINGTON INDUSTRIES FOR: "	2426/8-05 "		2,315.00 453.00			
FLOYD BROWN	2377/7-25				903.00	
SENATOR DOLE	"					
MIKE GLASSNER	"					
ARMOR	"					
PLESSEN	"					
NICKELS	"					
MELISIS	"					
INTERNATIONAL TOURS ALEXANDRIA	2468/8-12					
DONALD DEVINE	"		480.00			
FLOYD BROWN	"				480.00	
BILL LACY	"		480.00			
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SUBTOTALS:		29.83	3,728.00		1,646.76	
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DESCRIPTION OF EVENT/ DATE OF EVENT/ PAYEE	CHECK # & CHECK DATE	IOWA ALLOCABLE AMT	IOWA TRVL-NON ALLOCABLE	OTHER EXPENSES	MEMO ENTRY EXPS	ATTENDEES @ EVENT
-----						
<b>8/22/86-8/23/86</b>						
<b>IOWA STATE FAIR</b>						
-----						
FLOYD BROWN	2584/9-02				354.05	<b>ATTENDEES:</b> SENATOR DOLE F BROWN JOE KELLEY TOM SOUCY M GLASSNER BILL LACY BEN SCHWARM
JOE KELLY	2908/10-10	12.28				
JOE KELLY	2603/9-03	91.92	461.00			
JOE KELLY	2634/9-05	137.48				
TOM SOUCY	2776/9-23	94.77	250.00			
TOM SOUCY	2871/10-06	119.53	275.00			
RUAN INC	2732/9-18		2,177.00			
DSM FLYING SERVICE	2541/8-22	791.00				
TIBBEN FLIGHTS	3299/11-05	198.72				
HOTEL DSM FOR:	2814/9-30					
FLOYD BROWN	"				284.99	
JANE VOIGHTS	"				72.29	
TOM SAUCY	"	239.59				
SENATOR DOLE	"	138.75				
BILL LACY	"	58.29				
MIKE GLASSNER	"	50.71				
BILL LACY	2576/8-28		15.00	418.78		
BEN SCHWARM	2635/9-05	236.99	350.00	288.00		
FREEMAN COMPANY	2661/9-10	68.12				
-----						
<b>SUBTOTALS:</b>		<b>2,238.15</b>	<b>3,528.00</b>	<b>706.78</b>	<b>712.13</b>	
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<b>9/19/86-9/21/86</b>						
<b>SENATOR GRASSLEY BIRTHDAY EVENTS</b>						
-----						
JEFF DAVIS	2842/10-01	291.57	373.00			<b>ATTENDEES:</b> SENATOR DOLE J DAVIS J RAUBER F BROWN
J RAUBER, JR	2839/10-01	85.49	489.00			
FLOYD BROWN	2769/9-23				266.94	
MISSISSIPPI CHEMICAL COMPANY	2738/9-18		2,602.84	5,205.66		
INTERNATIONAL TRS ALEXANDRIA	2833/10-01					
FLOYD BROWN	"				440.00	
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<b>SUBTOTALS:</b>		<b>377.06</b>	<b>3,464.84</b>	<b>5,205.66</b>	<b>706.94</b>	
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DESCRIPTION OF EVENT/ DATE OF EVENT/ PAGE	CHECK # & CHECK DATE	IOWA ALLOCABLE AMT	IOWA TRVL-NON ALLOCABLE	OTHER EXPENSES	MEMO ENTRY EXPS	ATTENDEES & EVENT
-----						
10/21/86-10/22/86						
STEERING COMMITTEE MEETING						
-----						
HOTEL FORT DSM FOR:						
FLOYD BROWN	3370/11-10				136.84	ATTENDEES: FLOYD BROWN
BILL LACY	"	38.85				BILL LACY
DONALD DEVINE	"	69.74				DON DEVINE
INTERNATIONAL TOURS ALEXANDRIA	3212/10-29		530.00			CAL MULTMAN
BILL LACY	"					JOHN REHMAN
CAL MULTMAN	3330/10-20				88.99	
JOHN REHMAN	3440/10-20				456.25	
SUBTOTALS:		108.59	530.00		687.08	
-----						
10/27/86-10/28/86						
DAVENPORT, COUNCIL BLUFF, CEDAR RAPIDS						
-----						
BLACEMORE HOTEL FOR:						
SENATOR DOLE	3272/11-04	33.00				ATTENDEES: SENATOR DOLE
MIKE GLASSNER	"	36.90				M GLASSNER
FLOYD BROWN	"				47.64	F BROWN
DONALD DEVINE	"	59.91				D DEVINE
SARA CEDARHOLM	3352/11-13	173.98				S CEDARHOLM
INTERNATIONAL TOURS ALEXANDRIA	3372/11-18		145.00			C MULTMAN
SARA CEDARHOLM	"					J VOIGHTS
AMERICAN FINANCIAL GROUP	3330/11-11		3,784.67	7,569.33		
INTERNATIONAL TOURS ALEXANDRIA	3312/10-29				525.00	
JANE VOIGHTS	"					
SUBTOTALS:		303.79	3,929.67	7,569.33	572.64	
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DESCRIPTION OF EVENT/ DATE OF EVENT/ PAYEE	CHECK # & CHECK DATE	IOWA ALLOCABLE AMT	IOWA TRVL-HOM ALLOCABLE	OTHER EXPENSES	MEMO ENTRY EXPS	ATTENDEES & EVENT
<b>11/24/86-11/26/86</b>						
<b>MEETING @ DSM/AGRICULTURE SUMMIT CONFERENCE</b>						
FLOYD BROWN	3487/12-05				188.67	ATTENDEES: SENATOR DOLE FLOYD BROWN SANDRA CHURCH SARA CEDARNOLM GOVERNOR BRANSTAD CONGRESSMAN LEACH CONGRESSMAN TAUBE T GRANDY M SCARLOW
SARA CEDARNOLM	3628/12-24	236.50				
LESHER & ASSOCIATES	3479/12-02	52.50	222.50			
AIRPORT HILTON	3395/11-20	288.00				
AIRPORT HILTON	3791/1-21	379.28				
INTERNATIONAL TOURS ALEXANDRIA	3585/12-05					
FLOYD BROWN	..		234.00		480.00	
SARA CEDARNOLM	..		4,785.00			
AMERICAN FINANCIAL CORPORATION	3687/12-23		264.00			
BETTI'S WORLD OF TRAVEL	3793/1-21					
<b>SUBTOTALS:</b>		<b>876.28</b>	<b>5,505.50</b>		<b>668.67</b>	

DESCRIPTION OF EVENT/ DATE OF EVENT/ PAYEE	CHECK # & CHECK DATE	IOWA ALLOCABLE AMT	IOWA TRVL-HOM ALLOCABLE	OTHER EXPENSES	MEMO ENTRY EXPS	ATTENDEES & EVENT
<b>12/02/86-12/07/86</b>						
<b>DOLE'S ADDRESS TO IOWA SHERIFFS &amp; DEPUTIES ASSOCIATION</b>						
FLOYD BROWN	3867/2-02				61.09	ATTENDEES: SENATOR DOLE FLOYD BROWN PERRY BROWN SARA CEDARNOLM
PERRY BROWN	3645/1-07				92.42	
BUAN INCORPORATED	3528/12-09		2,175.00			
INTERNATIONAL TOURS ALEXANDRIA	3595/12-23					
SARA CEDARNOLM	..		228.00			
FLOYD BROWN	..				250.00	
SARA CEDARNOLM	..	269.04	10.00		5.00	
<b>SUBTOTALS:</b>		<b>269.04</b>	<b>2,413.00</b>	<b>0</b>	<b>408.51</b>	

7307016500

1987	DESCRIPTION / DATE OF PAYE	EVENT / ANT	CHECK #	CHECK DATE	IOWA ALLOCABLE AMT	IOWA TRVL-MON ALLOCABLE	OTHER EXPENSES	MEMO ENTRY EXPS	ATTENDEES @ EVENT
1/12/87	DOLE'S ADDRESS TO LUMBERMAN'S ASSOCIATION								
	FLOYD BROWN		3867/2-02		640.47			57.98	SEN DOLE T SYMORST F BROWN
	HOTEL FORT DSM		4235/1-23						
	AVIS RENT-A-CAR FOR:		3926/2-10						
	TOM SYMORST							87.97	
	TOM SYMORST		3792/1-21					156.11	
	COMAGRE . INC		3699/1-09			845.00	1,699.00		
	BUSINESSMAN'S ASSURANCE CO		3766/1-16			481.67	2,408.33		
	INTERNATIONAL TOURS ALEXANDRIA		3883/1-22					278.00	
	TOM SYMORST								
	SUBTOTALS:								
					640.47	1,326.67	4,098.33	580.06	

1987	DESCRIPTION / DATE OF PAYE	EVENT / ANT	CHECK #	CHECK DATE	IOWA ALLOCABLE AMT	IOWA TRVL-MON ALLOCABLE	OTHER EXPENSES	MEMO ENTRY EXPS	ATTENDEES @ EVENT
1/21/87-1/23/87	DOLE'S ADDRESS TO AGC								
	HOTEL FORT DSM		4235/1-23		871.94				SEN DOLE T SYMORST F BROWN
	INTERNATIONAL TOURS ALEXANDRIA		3883/1-22						
	TOM SYMORST								
	FLOYD BROWN		3871/1-22			2,610.00		390.00	
	RVI AVIATION		3773/1-20					328.00	
	SUBTOTALS:								
					871.94	2,610.00		718.00	

230 / 0165010

DESCRIPTION OF EVENT/ DATE OF EVENT/ PAYEE	CHECK # & CHECK DATE	IOWA ALLOCABLE AMT	IOWA 15% NON ALLOCABLE	OTHER EXPENSES	MEMO ENTRY EXPS	ATTENDEES & EVENT	Commission Determined IA Allocable
<b>1987</b>							
<b>TOWN MEETING:</b>							
TOWN MEETING v ORANG, ITY & IOWA BANKERS ASSOCIATION ADDRESS							
LONG LINE COMMUNICATIONS	3899/2-06		1,938.00				
THE COMPANIES OF CLAW	4345/4-09	344.80					172.44
UB POSTMASTER	3823/1-27	2,349.48					2,349.48
MACDONALD LETTER SERVICE	4350/4-10	470.65					470.65
TOM SYNHORST	40/3/2-26				341.69		
<b>SUBTOTALS:</b>		3,165.01	1,938.00		341.69		2,992.57
<b>2/12/1987</b>							
<b>TOWN MEETING:</b>							
MACDONALD LETTER SERVICE							
UB POSTMASTER	4350/4-10	199.00					199.00
GRUITH INDUSTRIES	3850/1-7	1,785.14					1,785.14
INTERNATIONAL TOURS ALEXANDRIA	3902/2-06	983.50	2,950.50				
SEVERLY TAUNE	4018/2-20	598.00					
TOM SYNHORST					696.00		
TOM SYNHORST	4044/2-25				372.37		
<b>SUBTOTALS:</b>		1,984.14	1,581.50	2,950.50	1,068.37		1,984.14
<b>2/22/87</b>							
<b>TOWN MEETING, DBM</b>							
MACDONALD LETTER SERVICE							
UB POSTMASTER	4262/3-31	1,762.00					1,762.00
DES MOINES AIRPORT HILTON	3952/2-16	7,215.60					7,215.60
DES MOINES AIRPORT HILTON	4246/3-24	36.10					36.10
BEPCO INCORPORATED	4024/2-23	338.00					338.00
INTERNATIONAL TOURS ALEXANDRIA	3989/2-19		1,383.00	1,383.00			
INTERNATIONAL TOURS ALEXANDRIA	4109/3-04				390.00		
TOM SYNHORST					167.08		
<b>SUBTOTALS:</b>		9,351.70	1,383.00	1,383.00	557.08		9,351.70

230/0165082

DESCRIPTION OF EVENT/ DATE OF EVENT/ PAYEE	CHECK # CHECK DATE	IOWA ALLOCABLE AMT	IOWA PRVL-NON ALLOCABLE	OTHER EXPENSES	MEMO ENTRY EXPS	ATTENDEES @ EVENT	Commission Determined IA Allocable
-----							
2/23/87 BREAKFAST MEETING, DAVENPORT						ATTENDEES: SENATOR DOLE M GLASSNER S MATTER T SYNHORST F BROWN	
KVI AVIATION	3990/2-19		1,620.00				
BLACKHAWK HOTEL FOR:	4236/3-23						
FLOYD BROWN	..				41.42		
TOM SYNHORST	..				41.42		
S MATTER	..	41.42					41.42
M GLASSNER	..	60.35					60.35
SENATOR DOLE	..	354.17					354.17
TOM SYNHORST					97.02		
-----							
SUBTOTALS:		355.94	1,620.00	0	179.86		355.94
-----							
SUBTOTALS:							
	3/31/86	1,822.41	6,183.15	0	544.48		
	4/04/86	707.10	4,726.23	226.68	453.57		
	4/18/86	2,181.22	0	0	1,323.59		
	4/30/86	4,338.54	204.93	256.96	1,380.74		
	6/20/86	647.00	1,462.50	0	979.20		
	7/25/86	0	0	0	475.18		
	8/03/86	29.83	3,728.00	0	1,646.76		
	8/22/86	2,238.15	3,528.00	706.78	1,173.13		
	9/19/86	377.06	3,464.84	5,205.66	706.94		
	10/11/86	108.59	530.00	0	225.07		
	10/27/86	303.79	3,929.67	7,569.33	572.64		
	11/24/86	876.28	5,505.50	0	688.67		
	12/02/86	269.04	2,413.00	0	408.51		
	1/12/87	640.47	1,326.67	4,098.33	580.06		
	1/21/87	871.94	2,610.00	0	710.00		
	2/07/87	3,165.01	1,938.00	0	341.69		
	2/12/87	1,984.14	1,581.50	2,950.50	1,068.37		2,992.57
	2/22/87	9,351.70	1,383.00	1,383.00	557.08		1,984.14
	2/23/87	355.94	1,620.00	0	179.86		9,351.70
-----							
GRAND TOTALS:		30,268.81	46,134.99	23,397.24	14,024.30	6,112,825.34	14,684.35
-----							

MJ001122

DOLE FOR PRESIDENT

Definition of Columns:

- Iowa Allocable Amount - These CA expenses are allocable to the Iowa spending limitation. Since CA personnel are not Committee employees, the "5 day rule" is not applied.
- Iowa Travel Non-Allocable - These expenses relate to CA Iowa activity but are for interstate travel, interstate telephone expenses, etc., and as such are not allocable to the Iowa spending limitation.
- Other Expenses - These expenses do not relate to Iowa but were paid with a CA check which also paid expenses related to Iowa.
- Memo Entry Expenses - These expenses are included in amounts discussed with respect to the payee. They are shown here only to provide a more complete picture of the event and attendees.

23070165013

230 / 0165014

ATTACHMENT 16  
Page 1 of 5DOLE FOR PRESIDENT  
Campaign America Expenses -  
Floyd Brown

Payee	Dates	Check #	Check Date	Iowa Allocable Amount	Non-Allocable Iowa Amount	Other Amount	Salary
Floyd Brown	03/18/86-03/22/86	1804	04/07/86	\$ 545.26	\$ -0-	\$ -0-	
Inter. Nat. Tours	03/18/86	1775	04/01/86	-0-	434.00	-0-	
Floyd Brown	03/23/86-3/26/86	1803	04/07/86	680.11	469.00	-0-	
Federal Express	03/25/86	2091	06/04/86	23.00	-0-	-0-	
Floyd Brown	03/16/86-3/31/86	Report	04/01/86				\$1,185.92
Floyd Brown	03/30/86-04/01/86	1805	04/07/86	254.58	-0-	-0-	
Inter. Nat. Tours	03/30/86	1775	04/01/86	-0-	290.00	-0-	
Floyd Brown	04/02/86-04/05/86	1805	04/07/86	370.56	468.00	33.02	
Inter. Nat. Tours	04/02/86	1884	04/21/86	-0-	285.00	-0-	
Floyd Brown	04/01/86-04/15/86	Report	04/15/86				1,185.92
Inter. Nat. Tours	04/16/86	1884	04/21/86	-0-	730.00	-0-	
Floyd Brown	04/16/86-04/18/86	1905	04/29/86	216.98	-0-	299.02	
Floyd Brown	04/19/86-04/25/86	1905	04/29/86	425.82	-0-	47.50	
	04/22/86-04/25/86	2425	08/05/86	129.30	-0-	-0-	
Floyd Brown	04/15/86-04/30/86	Report	04/29/86				1,185.92
Floyd Brown	04/29/86-05/04/86	1984	05/14/86	675.90	-0-	510.39	
HT. FT. DSM	04/29/86-05/04/86	2042	05/27/86	445.90	-0-	-0-	
Floyd Brown	05/01/86-05/04/86	2425	08/05/86	258.94	-0-	-0-	
Floyd Brown	05/01/86-05/15/86	Report	05/14/86				1,185.92
HT. FT. DSM	05/15/86-05/17/86	2078	06/02/86	153.52	-0-	-0-	
Floyd Brown	05/15/86-05/17/86	2149	06/16/86	244.37	-0-	646.15	
Floyd Brown	05/16/86-05/31/86	Report	06/01/86				1,185.92

Payee	Dates	Check #	Check Date	Iowa Allocable Amount	Non-Allocable Iowa Amount	Other Amount	Salary
Floyd Brown	06/09/86-06/11/86	2149	06/16/86	171.90	-0-	-0-	
	06/09/86-06/11/86	2425	08/05/86	142.40	-0-	-0-	
Inter. Nat. Tours	06/09/86	2144	06/16/86	-0-	444.00	-0-	
HT. FT. DSM	06/09/86-06/11/86	2151	06/16/86	129.94	-0-	-0-	
Floyd Brown	06/01/86-06/15/86	Report	06/15/86				1,185.92
Floyd Brown	06/18/86-06/20/86	2203	06/25/86	339.14	-0-	79.30	
Inter. Nat. Tours	06/18/86	2261	07/02/86	-0-	464.00	-0-	
Floyd Brown	06/26/86-06/29/86	2297	07/08/86	201.43	-0-	350.47	
	06/26/86	2425	08/05/86	8.50	-0-	-0-	
Floyd Brown	06/16/86-06/30/86	Report	06/25/86				1,185.92
Floyd Brown	07/01/86-07/15/86	Report	07/15/86				1,185.92
Inter. Nat. Tours	07/16/86-07/17/86	2370	07/24/86	-0-	290.00	-0-	
HT. FT. DSM	07/16/86-07/17/86	2392	07/28/86	138.07	-0-	49.90	
Floyd Brown	07/16/86-07/17/86	2425	08/05/86	134.81	-0-	-0-	
HT. FT. DSM	07/22/86-07/24/86	2397	07/28/86	120.05	-0-	-0-	
Floyd Brown	07/22/86-07/23/86	2425	08/05/86	138.04	-0-	-0-	
Fed - Exp	07/23/86	2450	08/08/86	23.00	-0-	-0-	
Inter. Nat. Tours	07/22/86	2430	08/05/86	-0-	247.00	-0-	
Burlington Ind.	07/26/86	2377	07/25/86	-0-	903.00	-0-	
Floyd Brown	07/15/86-07/31/86	Report	08/01/86				1,185.92
Floyd Brown	08/03/86-08/04/86	2506	07/03/86	51.56	-0-	14.00	
Inter. Nat. Tours	08/03/86	2468	08/12/86	-0-	480.00	-0-	
HT. FT. DSM	08/04/86	2487	08/14/86	105.14	-0-	-0-	
Floyd Brown	08/01/86-08/15/86	Report	08/15/86				1,185.92
Inter. Nat. Tours	08/18/86	2430	08/05/86	-0-	370.00	-0-	
Floyd Brown	08/19/86-08/23/86	2514	09/07/86	354.85	-0-	-0-	
HT. FT. DSM	08/19/86-08/23/86	2814	09/30/86	214.99	0	0	



Payee	Dates	Check #	Check Date	Iowa Allocable Amount	Non-Allocable Iowa Amount	Other Amount	Salary
Inter. Nat. Tours	08/27/86-08/30/86	2586	09/02/86	-0-	819.00	-0-	
Floyd Brown	08/27/86-08/30/86	2587	09/02/86	217.81	-0-	48.00	
Floyd Brown	08/29/86	2766	09/24/86	118.56	-0-	787.77	
HT. FT. DSM	08/27/86-08/30/86	2653	09/08/86	183.27	-0-	-0-	
Floyd Brown	08/15/86-08/31/86	Report	08/29/86				1,185.92
Floyd Brown	09/01/86-09/15/86	Report	09/15/86				1,185.92
Floyd Brown	09/17/86-09/20/86	2769	09/23/86	266.22	-0-	-0-	
Inter. Nat. Tours	09/17/86	2833	10/01/86	-0-	440.00	-0-	
HT. FT. DSM	09/17/86-09/19/86	3370	11/18/86	103.86	-0-	-0-	
Floyd Brown	09/16/86-10/01/86	Report	10/01/86				1,185.92
HT. FT. DSM	10/08/86-10/10/86	3370	11/18/86	91.18	-0-	-0-	
Floyd Brown	10/08/86-10/10/86	2959	10/15/86	167.21	-0-	-0-	
Inter. Nat. Tours	10/08/86	3071	10/22/86	-0-	480.00	-0-	
Floyd Brown	10/01/86-10/15/86	Report	10/15/86				1,185.92
HT. FT. DSM	10/15/86-10/17/86	3370	11/18/86	133.65	-0-	-0-	
Inter. Nat. Tours	10/15/86	3071	10/22/86	-0-	620.00	-0-	
HT. FT. DSM	10/20/86-10/22/86	3370	11/18/86	136.84	-0-	-0-	
Floyd Brown	10/19/86-10/20/86	3867	02/02/87	6.00	-0-	-0-	
Black Hawk Hotel	10/27/86-10/28/86	3272	11/04/86	47.64	-0-	-0-	
Floyd Brown	10/16/86-10/31/86	Report	11/01/86				1,185.92
Floyd Brown	11/01/86-11/15/86	Report	11/15/86				1,185.92
Floyd Brown	11/24/86-11/26/86	3487	12/05/86	170.67	-0-	-0-	
Inter. Nat. Tours	11/24/86	3515	12/26/86	-0-	480.00	-0-	
Floyd Brown	11/16/86-11/30/86	Report	11/26/86				1,185.92

Payee	Dates	Check #	Check Date	Town Allocable Amount	Non-Allocable Iowa Amount	Other Amount	Salary	Commission Det'd IA Allocable
Inter. Nat. Tours	12/04/86-12/07/86	3595	12/22/86	-0-	250.00	-0-		
Floyd Brown	12/06/86	3867	02/02/87	61.09	-0-	-0-		
Inter. Nat. Tours	12/11/86-12/12/86	3595	12/22/86	-0-	480.00	-0-		
Floyd Brown	12/11/86-12/12/86	3867	02/02/87	8.00	-0-	-0-		
Floyd Brown	12/01/86-12/15/86	Report	12/15/86				1,185.92	
Floyd Brown	12/15/86-12/31/86	Report	01/01/87				1,288.92	
Floyd Brown	01/12/87-01/13/87	3867	02/02/87	57.98	-0-	-0-		
Floyd Brown	01/01/887-01/15/87	Report	01/15/87				1,288.92	
Floyd Brown	01/17/87	3867	02/02/87	5.25	-0-	-0-		
Inter. Nat. Tours	01/21/87	3871	02/03/87	-0-	328.00	-0-		
Floyd Brown	01/23/87	3867	02/02/87	7.00	-0-	-0-		
Floyd Brown	01/16/87-01/31/87	Report	02/01/87				1,288.92	
Floyd Brown	02/01/87-02/15/87	Report	02/13/87				1,288.00	644.00
Black Hawk Hote.	02/22/87-02/23/87	4236	03/23/87	41.42	-0-	-0-		41.42
Floyd Brown	02/16/87-02/28/87	Report	02/27/87				<u>1,288.92</u>	<u>1,288.92</u>
<b>Total Salary and Documented Expenses</b>				<b>8,591.71</b>	<b>9,771.00</b>	<b>2,865.52</b>	<b>27,790.24</b>	<b>1,974.34</b>
<b>From Reports Only</b>								
			10/01/86	125.94				
			10/10/86	451.15				
			11/06/86	107.95				
			01/19/87	119.42				
			02/10/87	527.30				
			03/18/87	<u>338.69</u>				
<b>TOTAL.</b>				<b>\$10,262.16</b>	<b>\$9,771.00</b>	<b>\$2,865.52</b>	<b>\$27,790.24</b>	<b>1,974.34</b>

23070165088

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**Fixed Assets**

<u>Companion Determined Item Allowable</u>	<u>Less Non-Allowable</u>	<u>Total Activity</u>
\$1,974.34	0-0	\$1,974.34

237 / 0165019

DOLE FOR PRESIDENT  
Campaign America Expenses -  
Tom Synhorst

Payee	Dates	Check #	Check Date	Iowa Allocable Amount	Non-Allocable Iowa Amount	Other Expenses	Salary
Tom Synhorst	04/01/86-05/31/86	Report	06/23/86				\$ 2,000.00
Tom Synhorst	06/01/86-06/30/86	Report	07/01/86				1,000.00
Tom Synhorst	07/01/86-07/31/86	Report	07/31/86				1,000.00
Tom Synhorst	08/01/86-08/31/86	Report	08/29/86				1,000.00
Tom Synhorst	09/01/86-09/31/86	Report	10/06/86				1,000.00
Federal Express	10/23/86	3293	11/05/86	14.00	-0-	-0-	
Tom Synhorst	10/01/86-10/31/86	Report	11/01/86				1,000.00
Tom Synhorst	11/01/86-11/30/86	Report	12/02/86				1,000.00
Tom Synhorst	12/01/86-12/31/86	Report	01/07/87				1,000.00
Int. Nat. Tours	12/11/86	3595	12/22/86	-0-	390.00	-0-	
Tom Synhorst	01/01/87-01/15/87	Report	01/15/87				1,507.52
Tom Synhorst	01/08/87-01/13/87	3792	01/21/87	86.21	-0-	69.90	
Avis Rent-a-Car	01/08/87-01/13/87	3924	02/10/87	87.97	-0-	-0-	
Int. Nat. Tours	01/08/87	3803	01/22/87	-0-	278.00	-0-	
Tom Synhorst	01/16/87-01/31/87	Report	02/01/87				1,507.52
Int. Nat. Tours	01/19/87*	3803	01/22/87	-0-	390.00	-0-	

\*/ See Federal Express delivery to Hotel FT DSH 1/22/87.

23070165020

ATTACHMENT 17

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DOLE FOR PRESIDENT  
Campaign America Expenses -  
Tom Synhorst

Payee	Dates	Check #	Check Date	Iowa Allocable Amount	Non-Allocable Iowa Amount	Other Amount	Salary	Commission Det'd IA Allocable
Hotel Ft. DSN	01/27/87-01/30/87	4235	03/23/87	706.77	-0-	-0-		
Federal Express	01/28/87	3973	02/18/87	11.00	-0-	-0-		
Tom Synhorst	01/27/87-01/29/87	4057	02/26/87	229.08	-0-	-0-		
Int. Nat. Tours	01/30/87	3871	02/03/87	-0-	215.00	-0-		
Tom Synhorst	02/01/87-02/15/87	Report	02/13/87				1,507.52	753.76
Tom Synhorst	02/02/87-02/07/87	4073	02/26/87	341.69	-0-	-0-		
Int. Nat. Tours (Flight to Cedar Rapids)	02/03/87	3891	02/03/87	-0-	518.00	-0-		
Tom Synhorst	02/16/87-02/17/87	Report	02/22/87				1,455.52	1,455.52
Tom Synhorst	02/10/87-02/13/87	4044	02/25/87	372.37	-0-	-0-		372.37
Int. Nat. Tours	02/10/87	4018	02/20/87	-0-	696.00	-0-		
Tom Synhorst	02/18/87-02/24/87	4164	03/12/87	557.90	-0-	-0-		557.90
Int. Nat. Tours	02/18/87	4109	03/04/87	-0-	390.00	-0-		
Blackhawk Hotel	02/22/87-02/23/87			41.42	-0-	-0-		41.42
Int. Nat. Tours	03/03/87	4109	03/04/87	-0-	390.00	-0-		
Tom Synhorst		Report	04/16/87	262.29				
Grand Total				<u>\$2,710.70</u>	<u>\$3,267.00</u>	<u>\$ 69.90</u>	<u>\$14,978.08</u>	<u>3,180.97</u>

Tom Spelman

23070165020

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<u>Companion Document</u>	<u>Total Activity</u>
<u>Item Allotments</u>	
\$3,250.97	\$1,656.97
	\$1,478.00

DOLE FOR PRESIDENT  
Campaign America Expenses -  
Iowa Staff

Payee	Dates	Check #	Check Date	Iowa Allocable Amount	Non-Allocable Iowa Amount	Other Expenses	Salary
<b>JANE VOIGHTS</b>							
Jane Voights	06/15/86-06/30/86	2290	07/07/86				\$ 400.00
Jane Voights	06/10/86-06/18/86	2343	07/11/86	\$288.54			
HT FT DSM	06/20/86-06/21/86	2277	07/03/86	176.06			
Jane Voights	06/26/86-06/29/86	2905	10/09/86	103.36			
Jane Voights	06/15/86-07/15/86	2905	10/09/86	339.26			
Jane Voights	07/01/86-07/31/86	2454	08/11/86				800.00
Jane Voights	07/10/86-07/19/86	2455	08/11/86	118.57			
HT FT DSM	07/16/86-07/17/86	2392	07/28/86	49.90			
Jane Voights	07/13/86-07/28/86	2456	08/11/86	641.45			
HT FT DSM	07/24/86	2792	09/25/86	72.29			
HT FT DSM	07/26/86-07/27/86	2429	08/07/86	55.14			
Jane Voights	August - September	3165	10/28/86	60.08			
Jane Voights	08/01/86-08/31/86	Report	08/29/86				800.00
HT FT DSM	08/04/86-08/05/86	2485	08/14/86	93.06			
Jane Voights	08/03/86-08/05/86	2905	10/09/86	207.68			
Jane Voights	10/25/86-10/28/86	3378	11/18/86	319.20			
Int. Nat. Tours	10/25/86	3212	10/29/86	<u>525.00</u>			
<b>TOTAL Jane Voights</b>				<u>\$3,049.89</u>	<u>-0-</u>	<u>-0-</u>	<u>\$2,000.00</u>

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ATTACHMENT 1B

Page 2 of 5

DOLE FOR PRESIDENT  
Campaign America Expenses -  
Iowa Staff

Payee	Dates	Check #	Check Date	Iowa Allocable Amount	Non-Allocable Iowa Amount	Other Expenses	Salary
<b>JOHN REHMANN</b>							
John Rehmann	Unknown	1917	04/30/86				\$ 500.00
John Rehmann	04/04/86-05/26/86	2152	06/16/86	\$ 109.22			225.00
John Rehmann	07/25/86-09/01/86	3335	11/11/86				250.00
John Rehmann	Lease Negot.	3335	11/11/86				100.00
John Rehmann	07/25/86-09/01/86	3335	11/11/86	125.18			
John Rehmann	09/01/86-10/01/86	3336	11/11/86	338.00		4.70	
John Rehmann	10/01/86-10/31/86	3440	11/25/86	118.75			337.50
John Rehmann	11/01/86-01/19/87	3844 and 4059	01/29/87 and 02/26/87	275.78			1,350.00
<b>TOTAL</b>	<b>John Rehmann</b>			<u>\$966.93</u>	<u>-0-</u>	<u>\$ 4.70</u>	<u>\$2,762.50</u>



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DOLE FOR 'NT  
Campaign America Expenses - Iowa Staff

Payee	Dates	Check #	Check Date	Iowa Allocable Amount	Non-Allocable Iowa Amount	Other Expenses	Salary	Commission Det'd IA Allocable
<b>CAL HULTMAN</b>								
Cal Hultman	09/01/86-09/15/86	2804	09/26/86				\$ 750.00	
Cal Hultman	09/02/86-09/05/86	2782	09/24/86	\$ 259.76				
Cal Hultman	09/07/86-09/12/87	2781	09/24/86	280.84				
Cal Hultman	09/16/86-10/31/86	3032	10/17/86				2,250.00	
Cal Hultman	09/16/86-09/19/86	2818	09/30/86	188.70				
Cal Hultman	09/22/86-09/26/86	2950	10/15/86	433.36				
Cal Hultman	09/30/86	2951	10/15/86	114.63				
Cal Hultman	10/05/86-10/15/86	3379	11/18/86		6.61			
Cal Hultman	10/11/86	3139	10/28/86	85.22				
Cal Hultman	10/22/86	3138	10/28/86	88.99				
Cal Hultman	10/28/86	3304	11/06/86	48.20				
Cal Hultman	11/01/86-11/15/86	Report	11/01/86				750.00	
Cal Hultman	11/16/86-11/30/86	3374	11/01/86				750.00	
Cal Hultman	11/18/86	3581	12/18/86	16.30				
Cal Hultman	12/01/86-12/15/86	Report	12/02/86				750.00	
Cal Hultman	12/16/86-12/31/86	3554	12/15/86				750.00	
Cal Hultman	01/01/87-01/15/87	Report	01/07/87				750.00	
Cal Hultman	01/16/87-01/31/87	3747	01/15/87				750.00	
Cal Hultman	02/01/87-02/15/87	Report	02/02/87				750.00	375.00
Cal Hultman	02/16/87-02/28/87	Report	03/02/87				750.00	750.00
Cal Hultman	03/01/87-03/31/87	4413	04/28/87				1,500.00	1,500.00
<b>TOTAL</b>	Cal Hultman			<u>\$1,516.00</u>	<u>\$6.61</u>	<u>-0-</u>	<u>\$10,500.00</u>	<u>2,625.00</u>

DOLE FOR PRESIDENT  
Campaign America Expenses -  
Iowa Staff

Payee	Date	Check #	Check Date	Iowa Allocable Amount	Non-Allocable Iowa Amount	Other Expenses	Salary
<b>PENNY BROWN</b>							
Int. Nat. Tours	10/06/86	3071	10/22/86		\$ 491.00		
Penny Brown	10/07/86	2947	10/15/86		83.13		
Int. Nat. Tours	11/20/86	3871	12/26/86		360.00		
Penny Brown	11/20/86-11/21/86	3564	12/17/86		120.47		
Penny Brown	12/01/86-12/31/86	3540	12/09/86				\$ 2,400.00
Penny Brown	12/03/86-12/09/86	3645	01/07/87	92.42			
Penny Brown	01/01/87-01/31/87	3789	01/21/87				2,400.00
<b>TOTAL</b>	<b>Penny Brown</b>			<u>\$ 92.42</u>	<u>\$1,054.60</u>	<u>-0-</u>	<u>\$ 4,800.00</u>

DOLE FOR PRESIDENT  
Campaign America Expenses -  
Iowa Staff

Payee	Dates	Check #	Check Date	Iowa Allocable Amount	Non-Allocable Iowa Amount	Other Expenses	Salary	Commission Det'd IA Allocable
<b>JEFF NELSON</b>								
Jeff Nelson		3334	11/11/86				\$1,750.00	
Jeff Nelson		3811	01/23/87				<u>1,750.00</u>	
<b>TOTAL Jeff Nelson</b>				<u>-0-</u>	<u>-0-</u>	<u>-0-</u>	<u>\$3,500.00</u>	
<b>CAROL LEHMOHL</b>								
Carol Lehmohl	February 1987	4103	03/04/87	<u>-0-</u>	<u>-0-</u>	<u>-0-</u>	<u>1,200.00</u>	942.86
<b>WYTHE WILLEY</b>								
Wythe Willey	01/01/87-02/28/87	4263	03/31/87	<u>-0-</u>	<u>-0-</u>	<u>-0-</u>	<u>4,000.00</u>	<u>1,491.53</u>
<b>Iowa Staff Totals</b>				<u>\$5,625.24</u>	<u>\$1,061.21</u>	<u>\$ 4.70</u>	<u>\$28,762.50</u>	<u>5,059.39</u>
Total Iowa Amount								5,059.39
Less: Iowa Non-Allocable								<u>-0-</u>
<b>Iowa Allocable Amount</b>								<u>5,059.39</u>
								<u>\$ 34,387.74</u>

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ATTACHMENT 19  
Page 1 of 1DOLE FOR PRESIDENT  
Campaign America Records -  
Iowa Miscellaneous Expenses

Payee	Dates	Check #	Check Date	Iowa Allocable Amount	Non-Allocable Iowa Amount	Other Expenses
Joseph Barret	03/23/86-03/26/86	1703 1814	04/08/86	\$ 168.57		
Grassley '86 Committee	N/A	3794	01/21/87	1,100.00		
Postmaster	N/A	2153	06/17/86	1,170.00		
	N/A	2359	07/23/86	132.00		
	N/A	2361	07/23/86	102.00		
HT. FT. DSM for S. Sego	05/14/86-05/16/86	2095	06/04/86	91.15		
Elaine Smith	02/23/87	4261	03/31/87	188.56		
Torchmark Corp.	12/23/86	3594	12/22/86		649.00	649.00
Watergate Terrace	12/16/86	3711	01/13/86	72.83		
	12/16/86	4162	03/12/86	72.82		
<b>TOTALS</b>				<u>\$3,097.93</u>	<u>649.00</u>	<u>649.00</u>
Total Iowa Amount	\$3,746.93					
Less Non-Allocable Amount	<u>649.00</u>					
Iowa Allocable Amount	<u>\$3,097.93</u>					

DOLE FOR PRESIDENT  
REVIEW OF CAMPAIGN AMERICA PAC RECORDS  
SCHEDULE OF EVENTS AND MEETINGS HELD IN NEW HAMPSHIRE BETWEEN:  
3/02/86-2/16/87

(SEE EXPLANATION OF COLUMN HEADINGS ON PAGE 5 OF 5 )

EVENTS:

DESCRIPTION OF EVENT/ DATE OF EVENT/ PAYEE	CHECK # & CHECK DATE	NH ALLOCABLE AMOUNT	TRVL-NON NH ALLOCABLE	OTHER EXPENSES	MEMO ENTRY EXPENSES	ATTENDEES & EVENT
1986						
3/02/86						
MEETING @ HOLIDAY INN MANCHESTER, NH						
PAUL RUSSO	1638/3-12	14.50		362.66		ATTENDEES: PAUL RUSSO KIRK CLIMBERBEARD
KIRK CLIMBERBEARD	1639/3-12	656.70				SENATOR DOLE
US JET AVIATION	1696/3-19		1,567.79	3,135.58		
SUBTOTALS:		671.20	1,567.79	3,498.24		

6/13/86-6/14/86						
SENATOR RUDMAN EVENT-NH						
ATTENDEES: BRIAN BERRY SENATOR DOLE & STAFF PAUL RUSSO						
BRIAN BERRY	2223/6-27	70.49		70.49		
BRIAN BERRY	2174/6-23	93.45		112.00		
PAUL RUSSO	2248/6-20		750.00	1,800.00	495.06	
AMERICAN FINANCIAL CORPORATION 2178/6-23						
INTERNATIONAL TOURS ALEXANDRIA 2144/6-16						
BRIAN BERRY	"		115.00			
US TOBACCO	2180/6-23		2,351.00	2,711.00		
SUBTOTALS:		163.94	3,216.00	4,693.49	495.06	

6/18/86-6/20/86						
MEETING/EVENT UNKNOWN @ MANCHESTER						
ATTENDEES: DONALD DEVINE PAUL RUSSO						
AMERICAN EXPRESS FOR:						
DONALD DEVINE	2294/7-08	189.85		201.36	96.57	
DONALD DEVINE	"					
PAUL RUSSO	2249/6-30					
CABET OF BOSTON FOR:	2289/7-07					
DONALD DEVINE	"					
SUBTOTALS:		202.72		201.36	96.57	

ATTENDEES: DONALD DEVINE PAUL RUSSO						
SUBTOTALS:		392.57		201.36	96.57	

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DESCRIPTION OF EVENT/ DATE OF EVENT/ PAYEE	CHECK # & CHECK DATE	NH ALLOCABLE AMOUNT	NH TRVL-NON ALLOCABLE	OTHER EXPENSES	MEMO ENTRY EXPENSES	ATTENDEES & EVENT
8/24/86-8/29/86 PHOTO OPPORTUNITY DALE BANQUET (8/26/86)						
SEABOOK LUNCHEON-(8/27/86)						
INTERNATIONAL TOURS ALEXANDRIA 2586/9-02			231.00			ATTENDEES: CHRIS CUSHING BRIAN BERRY ELIZABETH DOLE SENATOR DOLE SUZANNE NIEMELA PAUL RUSSO MIKE GLASSNER JOHN CUBBAGE PETER STAHL
CHRIS CUSHING			149.00			
BRIAN BERRY			81.00			
BRIAN BERRY			279.00			
US TOBACCO			877.00			
SKYMASTER AIR TAXI FOR: ' ELIZABETH DOLE PLUS OMC'	2537/8-72 2710/9-7	614.60				
NEW HAMPSHIRE HELICOPTERS, INC	2657/9-10	1,636.50				
AMERICAN EXPRESS FOR: DONALD DEVINE	2878/10-07	340.11		111.40		
AMERICAN EXPRESS FOR: DONALD DEVINE	2623/9-05	151.27		410.12		
ALEXANDRIA POSTMASTER	2544/8-26	10.75				
CAREY OF BOSTON FOR: DONALD DEVINE	2649/9-08	171.08				
BALD PEAK COLONY CLUB FOR: SENATOR DOLE	2667/9-10	1,873.60				
ELIZABETH DOLE						
MIKE GLASSNER						
JOHN CUBBAGE	3235/10-30	715.30	24.60			
BALD PEAK COLONY CLUB	2788/8-25	266.00				
BANADA INN	2604/9-03	419.12				
PETER STAHL	3028/10-17	34.96				
GREENHOUSE RESTAURANT	3342/11-12	900.00				
TOMI PAPPAS & ASSOCIATES	2819/9-30	601.00				
PAUL RUSSO	2704/9-17				1,469.71	
PAUL RUSSO	2845/10-07				1,289.37	
SUZANNE NIEMELA	2849/10-03				818.20	
SUBTOTALS:		7,734.29	1,641.60	521.52	3,573.28	
-----						
10/05/86						
NEW HAMPSHIRE REPUBLICAN CONVENTION						
WILLIAM B LACY	3340/11-11	198.23		77.78		ATTENDEES: BILL LACY SUZANNE NIEMELA
NEW HAMPSHIRE HIGHWAY HOTEL	3207/10-29	149.62				
INTERNATIONAL TOURS ALEXANDRIA	3071/10-22		188.00			
B LACY						
SUBTOTALS:		347.85	188.00	77.78		

B 2 0 5 9 1 1 1 3 1

DESCRIPTION OF EVENT/ DATE OF EVENT/ PAYER	CHECK # & CHECK DATE	NH ALLOCABLE AMOUNT	MH TRVL-NON ALLOCABLE	OTHER EXPENSES	MEMO ENTRY EXPENSES	ATTENDEES & EVENT
<hr/>						
10/24/86 PRESS CONFERENCE @ CONCORD NH						ATTENDEES: SUZANNE NEIMELA SENATOR DOLE
SUZANNE NEIMELA	3500/12-05				140.70	
SUBTOTALS:					140.70	
<hr/>						
12/12/86-12/13/86						ATTENDEES: SENATOR DOLE SUZANNE NEIMELA
SENATOR DOLE ADDRESSES THE PORTSMOUTH ROTARY CLUB 12/12						
SENATOR DOLE ADDRESSES THE UNIVERSITY OF NH AT COMMENCEMENT DURHAM, NH 12/13						
HOLIDAY INN MANCHESTER	3664/1-07	202.75				
HOLIDAY INN MANCHESTER	3571/12-18	108.85				
AMERICAN FINANCIAL GROUP	3606/12-23		902.00	902.00		
NEW HAMPSHIRE HELICOPTER, INC	3684/1-07	795.00				
NEW HAMPSHIRE HELICOPTER, INC	3685/1-07	932.86				
SUZANNE NEIMELA	3651/1-07				500.69	
NEW ENGLAND CENTER FOR CONTINUING EDUCATION FOR: SUZANNE NEIMELA	3650/1-07				121.70	
SUBTOTALS:		2,039.46	902.00	902.00	622.39	
<hr/>						
1987						ATTENDEES: JEFF MANSFIELD SUZANNE NEIMELA SENATOR DOLE BRIAN BERRY
1/24/87-1/26/87 BRUNCH FOR 67 (1/25/87)						
JEFF MANSFIELD	4001/2-20	123.32				
HOLIDAY INN	3786/1-20	100.00				
SHERATON TARA	3772/1-19	195.00				
RED JACKET MOUNTAIN VIEW	3976/2-18	572.18				
NEW HAMPSHIRE HELICOPTERS, INC	3884/2-03	2,012.50				
US TOBACCO	3808/1-23		1,150.00			
INTERNATIONAL TOURS ALEXANDRIA	3871/2-03					
BRIAN BERRY	"		318.00			
SUZANNE NEIMELA	3914/2-10				828.48	
SUBTOTALS:		3,003.00	1,468.00		828.48	
<hr/>						

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DESCRIPTION OF EVENT/ CHECK # DATE OF EVENT/ CHECK DATE MM ALLOCABLE TRVL-NON MM OTHER MEMO ATTENDEES  
 AMOUNT ALLOCABLE EXPENSES ENTRY EXPENSES EVENT

2/16/87

SENATOR DOLE ADDRESSES THE KEEFE, NEW HAMPSHIRE ROTARY CLUB  
 BREAKFAST FOR 60 PEOPLE

ATTENDEES:  
 SUSANNE WEIMELA  
 BRIAN BERRY  
 SENATOR DOLE

THE BOILERHOUSE 4150/3-11 1,185.10  
 RAMADA INN 3905/2-10 250.00  
 ROCKINGHAM COUNTY REPUBLICAN COMMITTEE 4048/2-25 150.00  
 JOHN MULAZZI 4166/3-12 88.30  
 INTERNATIONAL TOURS ALEXANDRIA 4018/2-20  
 BRIAN BERRY  
 SUSANNE WEIMELA 4163/3-12

SUBTOTALS:

1,673.40 139.00 396.99

SUBTOTALS:

3/02/86	671.20	1,567.79	3,498.24	495.06
6/13/86	163.94	3,216.00	4,693.49	96.57
6/18/86	392.57		701.16	
8/24/86	7,734.29	1,641.60	521.52	3,573.28
10/05/86	347.85	188.00	77.78	
10/24/86				140.70
12/12/86	2,039.46	902.00	902.00	622.39
1/24/86	3,003.00	1,468.00		828.48
2/16/86	1,673.40	139.00		396.99
	16,025.71	9,122.39	9,894.39	6,153.47

GRAND TOTALS:

925,148.10 541,195.96

0805910/036



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DOLE FOR PRESIDENT

Definition of Columns:

- New Hampshire Allocable Amount - These CA expenses are allocable to the New Hampshire spending limitation. Since CA personnel are not Committee employees, the "5 day rule" is not applied.
- New Hampshire Travel Non-Allocable - These expenses relate to CA New Hampshire activity but are for interstate travel, interstate telephone expenses, etc., and as such are not allocable to the New Hampshire spending limitation.
- Other Expenses - These expenses do not relate to New Hampshire but were paid with a CA check which also paid expenses related to New Hampshire.
- Memo Entry Expenses - These expenses are included in amounts discussed with respect to the payee. They are shown here only to provide a more complete picture of the event and attendees.

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DOLE FOR PRESIDENT  
Campaign America Expenses -  
Paul Russo

Payee	Dates	Check #	Check Date	NI Allocable Amount	Non-Allocable NI Amount	Other Expenses	Salary
Paul Russo	06/03/86	2247	06/30/86	\$ 55.59	\$ 11.00	-0-	
Paul Russo	06/13/86-06/15/86	2248	06/30/86	477.56	17.50	-0-	
Inter. Nat. Tours	06/13/86	2144	06/16/86	-0-	115.00	-0-	
Paul Russo	06/19/86-06/20/86	2249	06/30/86	87.57	9.00	-0-	
Paul Russo	06/01/86-06/30/86	Report	07/01/86				\$ 2,500.00
Paul Russo	07/01/86-07/03/86	2355	07/21/86	401.51	17.50	-0-	
Inter. Nat. Tours	06/30/86	2261	07/02/86	-0-	149.00	-0-	
Paul Russo	07/01/86-07/31/86	Report	07/30/86				2,500.00
Paul Russo	07/16/86-07/17/86	2570	08/28/86	278.97	16.00	-0-	
Inter. Nat. Tours	07/16/86	2370	07/24/86	-0-	196.00	-0-	
Paul Russo	07/23/86-07/24/86	2438	08/07/86	282.69	8.00	-0-	
Inter. Nat. Tours	07/23/86	2468	08/12/86	-0-	161.00	-0-	
Paul Russo	08/11/86-08/13/86	2521	08/22/86	508.16	16.50	-0-	
Inter. Nat. Tours	08/11/86	2547	08/26/86	-0-	197.49	-0-	
Paul Russo	08/18/86-08/24/86	2845	10/07/86	1,279.87	9.50	-0-	
Paul Russo	08/24/86-08/29/86	2704	09/17/86	1,469.71	-0-	-0-	
Inter. Nat. Tours	08/18/86	2547	08/26/86	-0-	196.00	-0-	
Paul Russo	08/01/86-08/31/86	Report	09/05/86				<u>2,500.00</u>
TOTAL				<u>\$4,841.63</u>	<u>\$1,119.49</u>	<u>\$ -0-</u>	<u>\$7,500.00</u>
New Hampshire Allocable				\$12,341.63			
New Hampshire Non-Allocable				<u>1,119.49</u>			
Total				<u>\$13,461.12</u>			

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ATTACHMENT 22

Page 1 of 3

DOLE FOR PRESIDENT  
Campaign America Expenses -  
Suzanne Niemela

Payee	Dates	Check #	Check Date	NI Allocable Amount	Non-Allocable NI Amount	Other Expenses	Salary
Suzanne Niemela	07/01/86-07/31/86	2481	08/14/86				\$ 1,500.00
Abt Associates	7/86-8/86	3208	10/29/86	-0-	141.65	-0-	
Suzanne Niemela	08/24/86-08/29/86	2849	10/03/86	767.70	-0-	46.50	
Suzanne Niemela	08/01/86-08/31/86	2643	09/08/86				1,500.00
Suzanne Niemela	09/01/86-09/30/86	2870	10/06/86				1,500.00
Suzanne Niemela	09/17/86-09/27/86	2946	10/15/86	217.41	-0-	173.25	
Suzanne Niemela	09/28/86-10/04/86	3115	10/27/86	87.10	-0-	-0-	
Suzanne Niemela	10/05/86-10/10/86	3167	10/28/86	137.93	-0-	-0-	
Suzanne Niemela	10/14/86-10/17/86	3166	10/28/86	106.57	-0-	-0-	
Suzanne Niemela	10/20/86-10/25/86	3500	12/05/86	255.77	-0-	-0-	
Concord Answering Service	10/01/86-10/31/86	3294	11/05/86	50.00	-0-	-0-	
Suzanne Niemela	11/01/86-11/30/86	Report	12/02/86				1,500.00
Copy Craft	10/30/86	3295	11/05/86	39.00	-0-	-0-	
Suzanne Niemela	11/02/86-11/08/86	?	?	60.23	-0-	-0-	
Suzanne Niemela	11/09/86-11/15/86	?	?	42.71	-0-	-0-	
Suzanne Niemela	11/23/86-11/29/86	3653	01/07/87	58.68	-0-	-0-	

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ATTACHMENT 22

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DOLE FOR PRESIDENT  
Campaign America Expenses -  
Suzanne Niemela

Payee	Dates	Check #	Check Date	NI Allocable Amount	Non-Allocable NI Amount	Other Expenses	Salary
Concord Answering Service	12/01/86-12/31/86	3663	01/07/87	50.00	-0-	-0-	
N.E. Center for Continuing Educ.	12/13/86	3650	01/07/87	121.70	-0-	-0-	
Suzanne Niemela	12/07/86-12/13/86	3651	01/07/87	622.32	-0-	-0-	
Suzanne Niemela	12/01/86-12/31/86	3531	12/09/86				1,500.00
Concord Answering Service	01/01/87-01/31/87	3754	01/15/87	104.00	-0-	-0-	
Suzanne Niemela	8/86	3570	12/18/86	460.00	-0-	-0-	
Suzanne Niemela	01/11/87-01/25/87	3914	02/10/87	1,205.94	-0-	-0-	
Suzanne Niemela	01/01/87-01/31/87	Report	01/07/87				1,500.00
Suzanne Niemela	02/01/87-02/28/87	Report	01/30/87				1,500.00
Suzanne Niemela	02/13/87	3951	02/13/87	500.00	-0-	-0-	
Suzanne Niemela	02/09/87-02/14/87	4167	03/12/87	139.88	-0-	-0-	
Suzanne Niemela	02/15/87-02/21/87	4163	03/12/87	432.61	-0-	-0-	
Suzanne Niemela	03/01/87-03/31/87	Report	03/02/87				1,500.00
<u>Expenses from CA Reports</u>							
Suzanne Niemela		Report 3500	12/05/86	358.71	-0-	-0-	

# Telemarketing

Telemarketing & Associates Telemarketing, Inc.  
2811 INDEPENDENT AVENUE Des Moines Iowa 50312 (515) 244 4700

*Handwritten initials/signature*

## MARKETING RESEARCH PROJECT

DATE: 10/31/86

<u>CODE</u>	<u>CATEGORY</u>	<u>TOTAL</u>	<u>% OF COMPLETED CONTACTS</u>	<u>% OF COMPLETED SURVEYS</u>
100	COMPLETED SURVEYS	_____	_____	_____
110	R.D. RESPONDERS (Question #3)	_____	_____	_____
120	R.D. RESPONDERS (Question #4)	_____	_____	_____
	Total Complete Surveys	_____	_____	_____
200	NOT INTERESTED	_____	_____	_____
300	DISC // WRONG #	_____	_____	_____
	Total Completed Contacts	_____	_____	_____

ACCUMULATED TOTAL AS OF: 10/31/86

<u>CODE</u>	<u>CATEGORY</u>	<u>TOTAL</u>	<u>% OF COMPLETED CONTACTS</u>	<u>% OF COMPLETED SURVEYS</u>
100	COMPLETED SURVEYS	33,914	50.4	64
110	R.D. RESPONDERS (Question #3)	8,509	12.7	16.1
120	R.D. RESPONDERS (Question #4)	10,589	15.7	20
	Total Completed Surveys	53,012	78.8	
200	NOT INTERESTED	10,449	15.5	
300	DISC // WRONG #	3,997	5.6	
	Total Completed Contacts	67,258		

*household  
'86 primary voters  
86.2%*

1310165733

LOWA SURVEY TOTALS:

3070165037

Attachment 10  
Page 1 of 1

SURVEY CARDS: 29,021  
GOVERNOR:  
REPUBLICAN: 19,537 68.1%  
DEMOCRAT: 2,135 7.4%  
UNDECIDED: 6,398 24.4%  
TOTAL RESPONSES: 28,570

LEGISLATURE:  
REPUBLICAN: 19,735 84.3%  
DEMOCRAT: 1,835 7.9%  
UNDECIDED: 1,935 7.8%  
TOTAL RESPONSES: 23,405

PRESIDENT, 1ST:  
BAKER: 1,544 10.6%  
BUSH: 6,279 42.9%  
DOLE: 5,036 34.4%  
HAIG: 169 1.1%  
KEMP: 560 4.5%  
LAXALT: 100 0.7%  
PACKWOOD: 95 0.6%  
ROBERTSON: 742 5.1%  
TOTAL RESPONSES: 14,524

PRESIDENT, 2ND:  
BUSH: 5,622 39.8%  
DOLE: 5,844 41.4%  
KEMP: 1,739 12.3%  
ROBERTSON: 905 6.4%  
TOTAL RESPONSES: 14,110

FARM:  
APPROVE: 7,755 28.7%  
DISAPPROVE: 0,569 30.9%  
UNDECIDED: 11,224 40.5%  
TOTAL RESPONSES: 27,750

POLITICAL:  
PC: 6,149 17.9%  
CC: 14,569 42.5%  
OC: 6,591 19.5%  
WC: 6,951 20.0%  
TOTAL RESPONSES: 34,259

	2ND CHOICE			
	BUSH	DOLE	KEMP	ROBERTSON
	42.3%	44.1%	10.4%	3.2%
	1.9%	79.0%	11.2%	7.9%
	76.3%	1.0%	17.4%	5.3%
	23.9%	33.8%	22.5%	19.7%
	40.4%	45.5%	1.3%	12.8%
	28.6%	32.1%	35.7%	3.6%
	16.5%	57.0%	16.5%	10.1%
	44.0%	30.7%	23.5%	1.8%

03 / 11 6 0 9 3 8

**DUE FOR PAYMENT**  
Campaign America Expenses -  
Suzanne Mammala

Payee	Date	Check #	Check Date	MI Allocable Amount	Non-Allocable MI Amount	Other Expenses	Salary
Suzanne Mammala		Report 2564	08/29/06				1,500.00
				\$5,018.26	\$141.65	\$219.75	<u>(1,500.00)</u>
							\$12,000.00

Less: Check 3531 from Page 1, Line 39  
Which Does Not Appear to Have  
Cleared

Total New Hampshire Allocable \$17,818.26  
New Hampshire Non-Allocable 141.65  
Other 219.75  
**TOTAL** \$18,179.66

930/0165039