

Clean Up Congress
6010 Claiborne Dr.
McLean, VA 22101
January 27, 1995

Jan McBride
Reports Analysis Division
FEC
999 E St. NW
Washington, DC 20463

ID #: c00245456

Reference: 12 Day Pre-General Report (10/1/94-10/19/94)

Dear Ms. McBride,

I am responding to your letter of January 25, 1995.

In that letter, you ask me 3 questions:

(#1) Why did CUC state on its Detailed Summary Page that its itemized contributions totalled \$11,850 whereas they actually add up to \$12,375?

(#2) Why did CUC report expenditures that occurred after the reporting period?

(#3) What is the date of the second-to-last expenditure on page 15 of Schedule E? (This is my interpretation of what you were asking; I hope I have guessed right.)

In regard to question #1, there is actually no discrepancy. On Schedule A, when I itemized CUC's large contributions, I noted that one of the large contributors, Martha Reese, was also a partner in the Wilson-Clarendon Partnership, which also made a contribution (in-kind) to CUC. Since Martha owns 70% of the Wilson-Clarendon Partnership, I took 70% of the value of the Wilson-Clarendon Partnership's contribution and reported it in parentheses as a contribution by Martha Reese. I did this in the spirit of full reporting and in order to include Martha's share of the Wilson-Clarendon Partnership's contribution when I calculated her aggregated year-to-date contribution to CUC. But because I had already reported the entire Wilson-Clarendon donation on a separate line of Schedule A, I did not include Martha's share of that donation in my calculation of the total amount of large contributions that CUC received. If I had added Martha's share into the total of CUC's large contributions, I would have exaggerated (by that amount) the volume of CUC's large contributions.

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I thought that I had prevented any confusion by putting Martha's share of the Wilson-Clarendon-Partnership donation in parentheses. Obviously the parentheses did not do the trick. So I have found a new way to deal with this situation in the current (1994 year-end) FEC report, which I hope will be acceptable to you.

In regard to question #2, please refer to my previous letters to you in response to your previous letters to me. To summarize my previous letters to you, some of our expenditures are dated after the close of the reporting period for two reasons:

(a) I am sometimes unable to write the check for expenses incurred during a reporting period until after the close of the reporting period, and

(b) Expenditures such as salaries sometimes overlap two reporting period. We at CUC judge it preferable to report an expenditure too soon rather than too late. (It would not be possible to fractionalize expenses such as salaries between the earlier and later reporting periods, since most of our staff earns a different amount every day depending on how much money they raise for the campaign on that day. Then all these daily salaries are added into two-weeks salaries by our crude computer program, so I have no way of breaking down an employee's income on a daily basis.)

As I have stated in my previous letters to you regarding the issue you raise in question #2, I am willing to solve this in a different way that you suggest. As I have done previously, I ask only that you not impose any rules on us retroactively, since trying to switch our stuff now would be virtually impossible and lead to a lot of random guessing!

In regard to question #3, I assume this question refers to page 15 of CUC's report, where the date of the check to Pat Marks is missing. This omission is my fault, and I apologize for it. The date of that check was October 31, 1994. With that check (#862) I reimbursed Pat Marks for expenses that she incurred during the reporting period; she did not get her voucher to me until after the reporting period. (See my response to question #2 above.) I have enclosed a copy of Schedule E with all of the necessary information regarding the check to Pat Marks; it is notarized.

If you have any questions, my temporary phone number for the spring semester is (804) 296-3080.

Sincerely,



Abner L. Holton
Treasurer

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Period covered
1/1/94 to 12/31/94

ITEMIZED INDEPENDENT EXPENDITURES

(See Reverse Side for Instructions)

1994 Pre-General Election (12-Day Report)

Name of Committee (In Full)				
Clean Up Congress (CD245456)				
Full Name, Mailing Address & ZIP Code of Each Payee	Purpose of Expenditure	Date (month, day, year)	Amount	Name of Federal Candidate supported or opposed by the expenditure & office sought
P. J. Marks 1574 Dentary Place McLean, VA 2210	food, mail, etc in early Oct.	check dated 10/3/94	\$ 466. ²⁴	Oliver North, Sen. Va. Virginia. <input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose
				<input type="checkbox"/> Support <input type="checkbox"/> Oppose
				<input type="checkbox"/> Support <input type="checkbox"/> Oppose
				<input type="checkbox"/> Support <input type="checkbox"/> Oppose
				<input type="checkbox"/> Support <input type="checkbox"/> Oppose
				<input type="checkbox"/> Support <input type="checkbox"/> Oppose
(a) SUBTOTAL of Itemized Independent Expenditures			\$	
(b) SUBTOTAL of Unitemized Independent Expenditures			\$	
(c) TOTAL Independent Expenditures			\$	

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

Chris J. Haller Sr
Signature

1/28/95
Date

Subscribed and sworn to before me this 28 day of Jan 1995

My Commission expires:

10-31-97

Linda J. Honey
NOTARY PUBLIC

This form page 15 is a mandant for the entry on Schedule E for the CUC's 1994 pre-general election report.

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Federal Election Commission
ENVELOPE REPLACEMENT PAGE
FOR INCOMING DOCUMENTS

The Commission has added this page to the end of this filing to indicate how it was received.

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[Signature] PREPARER DATE PREPARED
2-1-95