



FEDERAL ELECTION COMMISSION
WASHINGTON DC 20463

April 22, 1992

MEMORANDUM

TO: FRED EILAND
CHIEF, PRESS OFFICE

FROM: ROBERT J. COSTA *RJC*
ASSISTANT STAFF DIRECTOR
AUDIT DIVISION

SUBJECT: PUBLIC ISSUANCE OF THE FINAL AUDIT REPORT ON
JESSE JACKSON FOR PRESIDENT '88 COMMITTEE,
JESSE JACKSON FOR PRESIDENT '88 COMMITTEE-CALIFORNIA
AND NEW YORKERS FOR JESSE JACKSON

Attached please find a copy of the Final Audit Report on
Jesse Jackson for President '88 Committee, Jesse Jackson for
President '88 Committee-California and New Yorkers for Jesse
Jackson, which was approved by the Commission on April 9, 1992.

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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MH002811



FEDERAL ELECTION COMMISSION 5 PII 2:35
WASHINGTON DC 20463

April 15, 1992

MEMORANDUM

TO: THE COMMISSIONERS

THROUGH: JOHN C. SURINA
STAFF DIRECTOR

FROM: ROBERT J. COSTA *ph fr RJC 4-15-92*
ASSISTANT STAFF DIRECTOR
AUDIT DIVISION

SUBJECT: FINAL AUDIT REPORT -
JESSE JACKSON FOR PRESIDENT '88 COMMITTEE
JESSE JACKSON FOR PRESIDENT '88 COMMITTEE-CALIFORNIA
AND NEW YORKERS FOR JESSE JACKSON

Attached for your information are the four revised pages of the subject Final Audit Report that was approved by the Commission on April 9, 1992 (Agenda Document #92-51). Please replace the pages included in Agenda Document #92-51.

The revisions contained within Finding VII.A.2. are corrections to the number and amount of undocumented non-qualified campaign expenses disbursed from Chase Lincoln First Bank, which increased from 18 disbursements totaling \$12,132.76 to 24 disbursements totaling \$25,701.76.

Recommendation #17 (b.p. 35) has been adjusted to reflect this increase in non-qualified campaign expenses (from \$60,746.95 to \$74,315.95) and the consequent pro rata repayment (from \$18,834.96 to \$23,042.11).

In addition, the following sections have also been adjusted for this correction: Finding VIII. Amounts Payable to the United States Treasury (b.p. 37, the Finding VII.A. repayment increases from 18,834.96 to 23,042.11 and the TOTAL increases from \$306,698.47 to \$310,905.62); Attachment 9 (b.p. 54); and b.p. 19 second paragraph, "18 disbursements totaling \$12,132.76" changes to "24 disbursements totaling \$25,701.76."

Memorandum to Commissioners
Page 2

If you have any questions, please contact Cornelia Riley or
Alex Boniewicz at 219-3720.

Attachments:

Revised pages 19, 35, 37, and 54 (bottom pagination) for the Final
Audit Report on Jesse Jackson for President '88 Committee, Jesse
Jackson for President '88 Committee-California and New Yorkers for
Jesse Jackson

13-7-1977-3

account's character as one exclusively associated with the campaign and used for campaign purposes."

The Audit staff reviewed the bank activity and cancelled checks and identified 24 disbursements totaling \$25,701.76 from this account that lack adequate documentation (see Finding VII.A.2.).

Recommendation #10

The Audit staff recommends no further action with regard to Title 2 Recordkeeping. Please see Finding VII.A.2. relative to Title 26 Repayments.

D. Matters Referred to the Office of General Counsel

Certain matters noted during the audit have been referred to the Office of General Counsel.

V. Jesse Jackson for President '88 Committee - 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.

The Regulations at 11 C.F.R. §9038.2(b)(2)(iii) state 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.

Pursuant to 11 C.F.R. §9033.5(c), the Commission determined Reverend Jackson's date of ineligibility to be July 20, 1988.

Based on additional documentation submitted by the Committee as part of its response to the interim audit report, the Audit staff revised the calculation of the repayment ratio as presented in that report.

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

The Audit staff now identifies 28 disbursements to individuals totaling \$48,614.19 which remain insufficiently documented. See Attachment 8.

2. Chase Lincoln First Bank

Disbursement records relative to this account were not provided to the Audit staff for review during fieldwork. In the interim audit report the Audit staff recommended that the NYJJ provide all records relative to the activity from this account. In response to the interim report the Committee submitted bank statements, cancelled checks, debit memoranda, and a handwritten list of disbursements including some purposes. Based on a review of the disbursements the Audit staff was able to determine that 16 disbursements totaling \$10,330.74 were campaign related expenses. The Audit staff determined that 24 disbursements totaling \$25,701.76 were insufficiently documented. See Attachment 9. No contemporaneous memoranda, receipted bills, vendor invoices, or signed statements from payees were submitted in support of the campaign qualified nature of these disbursements.

Recommendation #17

On _____, the Commission made an initial determination that the \$74,315.95 (\$48,614.19 + \$25,701.76) payments noted are non-qualified campaign expenses; and that the Committee make a pro rata repayment of \$23,042.11 (\$74,315.95 x .310056) to the U.S. Treasury pursuant to 26 U.S.C. §9038(b)(2)(A).

B. 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 its efforts to encourage the payees 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 NYJJ reported activity to its bank activity through September 30, 1988 and identified 8 stale dated checks totaling \$5,114.48.

At the exit conference on September 11, 1990, the Audit staff supplied NYJJ representatives with a schedule of the stale dated checks. See Attachment 10.

In the interim audit report the Audit staff recommended that NYJJ within 30 calendar days of service of that report (1) provide copies of any of the checks which have now cleared the bank; (2) inform the Commission of its efforts to encourage the

CORRECTED 4/9/92

VIII. Amounts Repayable to the United States Treasury

Presented below is a recap of the amounts subject to the repayment provisions of 26 U.S.C. §9038(b) or 11 C.F.R. §9038.6.

Finding V.B.	Apparent Non-Qualified Campaign Expenses - Penalties and Apparent Non-Campaign Related Travel	\$ 18,952.73
Finding V.C.	Apparent Non-Qualified Campaign Expenses - Undocumented Expenditures	159,160.64
Finding V.D.	Apparent Non-Qualified Campaign Expenses - Unreconciled Payments to Media Vendor	57,508.98
Finding V.E.	Excessive Portions of Contributions and Refunded Contributions Submitted for Matching	9,524.08
Finding VI.A.	Apparent Non-Qualified Campaign Expenses - Undocumented Disbursements (JJFP-CA)	36,930.19
Finding VI.B.	Matching Funds Received in Excess of Entitlement - Refunded Contributions Submitted for Matching (JJFP-CA)	672.41
Finding VII.A.	Apparent Non-Qualified Campaign Expenses (NYJJ)	23,042.11
Finding VII.B.	Stale Dated Committee Checks (NYJJ)	<u>5,114.48</u>
	TOTAL	<u>\$310,905.62</u>

It should be noted that these amounts are based on information made available as of November 7, 1991 and may be subject to change.

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Attachment 9 to
JJFF - FAR
Page 1 of 1

New Yorkers for Jesse Jackson '88
Non-qualified Campaign Expenditures - Un-documented
Chase Lincoln First Bank of New York

54

Payee per check	Audit Notes	Check Number	Check Date	Check Amount	Purpose per Committee List
1 Rochester Conv. Center		9250	4/08/88	2,500.00	Site rental
2 Rochester Conv. Center		9252	4/12/88	1,000.00	Site rental
3 Trailways		9253	4/15/88	506.00	Bus rental for Press
4 Dave Christopher Marton		1001	4/18/88	150.00	Casual labor
5 B B E	1	1003	4/19/88	370.00	
6 Lloyd Anderson		1004	4/20/88	76.85	Megaphones
7 Video Awareness Rentals		1006	4/21/88	1,384.00	Equipment rental
8 Ogden Allied Services	1	1007	4/21/88	149.61	
9 Jim Landers	1	1008	4/21/88	314.00	
10 Minister Florence	1,2	1009	4/21/88	71.46	
11 Clarence Majors		1011	4/21/88	64.40	Car rental
12 James Lloyd	1,2	1016	4/21/88	250.00	
13 Robert Smith		1017	4/22/88	525.00	Canvassing
14 Monroe County Dem. Committee		1028	4/29/88	62.88	Canvassing
15 Minister Franklin Florence	2	1029	4/29/88	3,996.06	\$1885.00 catering
16 Richard Williams	1	1030	5/05/88	110.00	
17 Afro-American Club		1031	5/20/88	100.00	Catering deposit
18 Afro-American Club		1034	6/14/88	702.50	Catering
19 Viele & McCooley, CPA		1035	8/25/88	750.00	Accounting Services
20 Midcity Signs		1036	8/25/88	144.00	Signs
21 Leons		1037	8/25/88	275.00	Office Equipment
22 no check provided		1038	unknown	1,200.00	Office Rental
23 Rainbow Coalition		1039	8/25/88	1,200.00	Office Rental
24 Jesse Jackson	3	1040	9/09/88	10,000.00	Transfer of Proceeds
Total:				\$25,701.76	

CORRECTED 4/9/92

Explanation of Notes:

- 1: No purpose indicated on Committee list
- 2: Payee is signatory on account
- 3: Not traced to a Committee depositor



FEDERAL ELECTION COMMISSION

WASHINGTON DC 20463

April 22, 1992

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SUBJECT: PUBLIC ISSUANCE OF THE FINAL AUDIT REPORT ON
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FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

MH002742

REPORT OF THE AUDIT DIVISION
ON
JESSE JACKSON FOR PRESIDENT '88 COMMITTEE,
JESSE JACKSON FOR PRESIDENT '88 COMMITTEE-CALIFORNIA
AND
NEW YORKERS FOR JESSE JACKSON '88

I. Background

A. Overview

This report is based on audits of the Jesse Jackson for President '88 Committee, the Jesse Jackson for President '88 Committee-California, and New Yorkers for Jesse Jackson '88 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 Section 9038(a) of Title 26 of the United States Code 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, Section 9039(b) of Title 26 of the United States Code and Section 9038.1(a)(2) of Title 11 of the Code of Federal Regulations state, in relevant part, that the Commission may conduct other examinations and audits from time to time as it deems necessary to carry out the provisions of this subchapter.

1. Jesse Jackson for President '88 Committee

The Jesse Jackson for President '88 Committee ("the Committee") registered with the Federal Election Commission on October 1, 1987 and served as the principal campaign committee of Jesse L. Jackson, Sr., Democratic Candidate for President of the United States. The Committee maintains its headquarters in Chicago, Illinois. The Candidate designated the Jesse Jackson for President '88 Committee-California on August 31, 1987, and the New Yorkers for Jesse Jackson '88 on January 27, 1988, as authorized committees.

The audit covered the period from the Committee's inception, January 28, 1987, through September 30, 1988, the final coverage date of the last report filed at the time of the audit. In addition, certain financial activity was reviewed through April 11, 1989 for purposes of determining the Committee's remaining matching fund entitlement based on its net outstanding campaign obligations. The Committee initially reported a beginning cash balance of \$-0-; total receipts for the period of \$22,152,283.09; total disbursements for the period of \$21,631,080.39; and a closing cash balance on September 30, 1988 of \$560,872.66.1/ The Committee filed amendments on January 30, 1990 and reported a beginning cash balance of \$-0-; total receipts for the period of \$24,041,798.64; total disbursements for the period of \$23,749,217.01; and a closing balance on September 30, 1988 of \$292,581.63.

2. Jesse Jackson for President '88 Committee-California

The Jesse Jackson for President '88 Committee-California ("JJFP-CA") registered with the Federal Election Commission on August 31, 1987, as an authorized committee for Jesse (L.) Jackson (Sr.). The JJFP-CA maintained its headquarters in Los Angeles, California.

The audit covered the period from the JJFP-CA's inception, August 31, 1987, through September 30, 1988, the final coverage date of the last report filed at the time of the audit. In addition, certain reported activity was reviewed through October 19, 1988 for purposes of determining the Committee's remaining matching fund entitlement based on net outstanding campaign obligations. The JJFP-CA reported a beginning cash balance of \$-0-; total receipts for the period of \$1,950,618; total disbursements for the period of \$1,934,217; and a closing cash balance on September 30, 1988 of \$16,402.00.2/

3. New Yorkers for Jesse Jackson '88

New Yorkers for Jesse Jackson '88 ("NYJJ") registered with the Federal Election Commission as an authorized committee for Jesse L. Jackson (Sr.) on January 27, 1988. NYJJ maintains its headquarters in New York, New York.

The audit covered the period from the NYJJ's inception on January 29, 1988, through September 30, 1988, the final coverage date of the last report filed at the time of the audit. In addition, certain financial activity was reviewed through December 14, 1988 for purposes of determining the Committee's remaining matching fund entitlement based on net

1/ Totals do not foot due to Committee math errors

2/ Does not foot due to rounding.

outstanding campaign obligations. NYJJ reported a beginning cash on hand balance of \$-0-; total receipts for the period of \$1,519,772.92; total disbursements for the period of \$1,497,909.90; and a closing cash balance on September 30, 1988 of \$21,863.02.3/

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 its 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 Treasurer of the Committee during the period reviewed was Mr. Howard R. Renzi.

The Treasurer of the JJFP-CA during the period reviewed was Mr. Julius Glazer.

The Treasurer of the NYJJ during the period reviewed was Mr. J. Wesley Parker.

C. Scope

The audit included such tests as verification of total reported receipts, disbursements, and individual transactions; review of supporting documentation; review of contribution and expenditure limitations; and such other audit procedures as deemed necessary under the circumstances; except that due to the lack of sufficient documentation, testing relative to certain Committee disbursements (see Findings V.C., V.D., VI.A. and VII.A.) and Committee debts and obligations was limited. In addition, testing with respect to Offsets to Expenditures, state expenditure limitations and qualified campaign expenses along with the resultant impact on the Statement of Net Campaign Obligations (see V.F.) was limited.

D. Introduction to Findings

Matters pertaining to Title 2 of the United States Code, which resulted from our review of the records made available relative to Jesse Jackson for President '88 Committee, are presented in Section II. of this report. Sections III. and IV. of this report present Title 2 matters which resulted from our review of the records made available relative to the two authorized

3/ These figures do not include activity relative to an apparent undisclosed bank account (see Findings IV.C. and VII.A.).

committees, Jesse Jackson for President '88 Committee-California and New Yorkers for Jesse Jackson '88, respectively. Sections V., VI. and VII. present matters pertaining to Title 26 arising from the Audit staff's review of the records made available with respect to the Committee, Jesse Jackson for President '88 Committee-California, and New Yorkers for Jesse Jackson '88. Section V.F. contains the presentation prepared by the Audit staff of the Statement of Net Outstanding Campaign Obligations based upon the records made available relative to all three committees.

II. Jesse Jackson for President '88 Committee ("the Committee") - Findings and Recommendations Related to Title 2 of the United States Code

A. Misstatement of Financial Activity

Sections 434(b)(1), (2) and (4) of Title 2 of the United States Code state, in relevant part, that each report shall disclose the amount of cash on hand at the beginning of the reporting period and the total amount of all receipts and disbursements received or made during the reporting period and the calendar year.

The Audit staff's reconciliation of the Committee's bank accounts available for review to the activity on its disclosure reports filed during the period covered by the audit, indicated the following differences:

1. For 1988 Disclosure Reports as Initially Filed

- Beginning Cash on Hand understated by \$18,588.92
- Reported receipts were understated by \$1,889,245.48
- Reported disbursements were understated by \$2,096,112.70
- Ending cash on hand was overstated by \$227,948.364/

The Audit staff did not perform an in-depth analysis relative to the above differences.

2. For 1988 Disclosure Reports as Amended

On January 30, 1990, the Committee filed amended reports for 1988. The Audit staff's reconciliation of bank activity to reported activity indicates that the Committee materially corrected the financial misstatement for 1988.

4/ The differences do not foot due to unexplained Committee adjustments of cash on hand between reporting periods.

Recommendation #1

The Audit staff recommends no further action on this matter.

B. Omission of Disclosure Information for Contributions from Individuals

Section 434(b)(3)(A) of Title 2 of the United States Code requires a political committee to report the identification of each person who makes a contribution to the committee in an aggregate amount or value in excess of \$200 per calendar year together with the date and amount of such contribution.

Section 431(13) of Title 2 of the United States Code defines the term "identification" to be in the case of any individual, the name, mailing address, and the occupation of such individual, as well as the name of his or her employer.

The Audit staff's review of contributions from individuals indicated that a material number of such contributions itemized on the reports as initially filed for 1987 and 1988 were missing the contributor's address and the correct aggregate year-to-date total.

The Committee filed amended reports on October 19, 1989 which materially corrected these irregularities.

Recommendation #2

The Audit staff recommends no further action on this matter.

C. Reporting of Federal Matching Funds Received

Section 434(b)(2)(K) of Title 2 of the United States Code provides that, for an authorized committee of a candidate for the office of President, each report under this section shall disclose for the reporting period and the calendar year Federal Funds received under Chapter 96 of Title 26.

Section 104.2(e) of Title 11 of the Code of Federal Regulations specifies that the authorized committees of a candidate for President shall file reports on FEC FORM 3-P. Additionally, the instructions for Schedule A-P of this form package require the committee to enter the total amount of federal funds received by the committee during the reporting period on this schedule.

The Audit staff's review of federal funds received by the Committee indicated that, for disclosure reports as initially filed, the Committee failed to file the requisite Schedules A-P for the period February, 1988 through June, 1988. However, the Committee reported \$4,151,442.57 of matching fund receipts on Line

16 for this period. Amended reports filed by the Committee on October 19, 1989 included the Schedules A-P.

The Audit staff's review also noted that the amount received (\$23,807.56) relative to Matching Fund Request S-03, certified on February 10, 1988, was not reported by the Committee on its reports as initially filed. Further, the amount received (\$625,114.63) relative to Letter Request L-03, certified on June 15, 1988, was reported incorrectly; the Committee reported the amount requested (\$555,775.03) rather than the amount actually received.

On October 19, 1989, the Committee filed amended reports materially correcting these items.

In the interim audit report ("IAR"), the Audit staff recommended no further action on this matter and noted that further recommendations may be forthcoming. In its response to the IAR, the Committee advanced no further detail relative to this finding.

Based on the above, the Commission determined to take no further action.

Recommendation #3

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

D. Request for Additional Documentation - Receipts and Bank Documentation

Section 432(c) of Title 2 of the United States Code states, in part, that the treasurer of a political committee shall keep an account of all contributions received by or on behalf of such political committee, the name and address of any person who makes any contribution in excess of \$50, and the identification of any person who makes a contribution or contributions aggregating more than \$200 during a calendar year, together with the date and amount of any such contribution. The treasurer of a political committee shall also keep an account of the name and address of every person to whom any disbursement is made, the date, amount, and purpose of the disbursement, and the name of the candidate and the office sought by the candidate, if any, for whom the disbursement was made, including a receipt, invoice, or cancelled check for each disbursement in excess of \$200.

Section 431(13)(A) of Title 2 of the United States Code defines the term "identification" to be, in the case of any individual, the name, mailing address, and the occupation of such individual, as well as the name of his or her employer.

Section 104.14(b)(1) of Title 11 of the Code of Federal Regulations states, in part, that each political committee

required to file any report under this subchapter shall maintain all records relevant to such reports, including bank records with respect to the matters required to be reported which shall provide, in sufficient detail, the necessary information from which the filed reports may be verified, explained, clarified, and checked for accuracy and completeness.

Section 102.9(c) of Title 11 of the Code of Federal Regulations states, in part, that the treasurer shall preserve all records and accounts required to be kept for three years after the report to which such records relate is filed.

Section 9033.1(b)(5) of Title 11 of the Code of Federal Regulations states, in part, that the candidate and the candidate's authorized committee(s) will keep and furnish to the Commission all the documentation relating to disbursements and receipts, including any books, records (including bank records for all accounts), and all documentation required by this section including those required to be maintained under 11 C.F.R. §9033.11 and other information that the Commission may request.

1. Receipts Documentation for Independence Bank

The Audit staff was unable to review receipts documentation for 26 deposits/credits, totaling \$99,430.15, to a Committee account at Independence Bank. The receipts documentation (deposit tickets and deposit batches) for this account was requested from the Committee on December 7, 1988, and again on January 23, 1989. The specific deposits for which batch deposit documentation was requested were identified to the Committee within a letter dated August 1, 1990.

2. Bank Documentation

Bank documentation relative to the following accounts for the periods indicated was not provided to the Audit staff:

- a. Liberty Bank and Trust account #218-548-2, April 30, 1988 to closure.
- b. Tri State Bank account #181358, June 30, 1988 to closure.
- c. Texas Bank of Denton account #210-156-4, inception to closure. A Committee check payable to Denton County Jackson for President Committee was negotiated to this account. This bank was not included on the Statement of Organization filed by the Committee.
- d. First National Bank of Madison County, Anderson, Indiana, from inception to closure.

During review of disbursements, the Audit staff noted two payments totaling \$15,000 payable to "Jesse Jackson '88 Indiana". These disbursements were endorsed either "for deposit only" or "JJ '88 Indiana". This bank was not included on the Statement of Organization filed by the Committee.

- e. Midwest National Bank account #107426-1, inception to closure. This bank was included on the Statement of Organization but no bank documentation was provided the Audit staff for this account.
- f. The First National Bank of Lawrence, Lawrence, Kansas, account #0860836, inception to closure. This bank was included on the Statement of Organization but no bank documentation was provided the Audit staff.

Documentation for the banks named above, except Midwest National and The First National Bank of Lawrence, was requested from the Committee within a letter dated August 1, 1990.^{5/}

In the interim audit report the Audit staff recommended that the Committee within 30 calendar days of service of that report provide to the Audit staff deposit batches and validated deposit tickets to support fully the 26 deposits noted. The Audit staff further recommended that the Committee provide all bank statements, debit/credit memoranda, cancelled checks, deposit tickets and copies of contributor checks to support fully the activity during the periods indicated for each bank account noted above. The Audit staff noted that further recommendations may be forthcoming.

The documentation as requested above was materially supplied by records provided by the Committee in response to the interim audit report and by records provided through subpoenas issued by the Commission.

Recommendation #4

The Audit staff recommends no further action on this matter.

E. Matters Referred to the Office of General Counsel

Certain matters noted during the audit were referred to the Office of General Counsel.

^{5/} On April 19, 1991 the Commission issued subpoenas for documentation from the banks discussed at 2.d. and 2.e. above.

III. Jesse Jackson for President '88 Committee-California
("JJFP-CA") - Findings and Recommendations Related to
Title 2 of the United States Code

A. Itemization of Contributions from Individuals

Section 434(b)(3)(A) of Title 2 of the United States Code requires a political committee to report the identification of each person whose contribution or contributions have an aggregate amount or value in excess of \$200 per calendar year, together with the date and amount of such contribution.

Section 431(13)(A) of Title 2 of the United States Code defines the term "identification" to be, in the case of any individual, the name, mailing address and occupation of such individual, as well as the name of his or her employer.

The Audit staff reviewed JJFP-CA contribution records to determine whether contributions received from individuals aggregating in excess of \$200 per calendar year were itemized as required on the disclosure reports. The results of testing these contributions on a sample basis indicated that 38% of contributions from individuals were not itemized as required. An analysis of the errors indicated that the high error rate occurred because it appeared that JJFP-CA did not itemize contributions of \$200 or less which when added to previous contributions from the same contributor aggregated in excess of \$200. However, JJFP-CA itemized contributions having a face value in excess of \$200.

The JJFP-CA representatives were advised of the itemization problem at the exit conference.

In the interim audit report the Audit staff recommended that within 30 days of service of that report, JJFP-CA file amended Schedules A-P to correct the itemization problem.

Subsequent to the IAR, the Audit staff estimated the amount of contributions from individuals which were not itemized as required. We quantified the facially itemizable contributions on the magnetic media, netted out duplicates and probable political committee contributions, and added itemizable contributions not included on the magnetic media. We then compared this total to the facially itemizable contributions on the disclosure reports. The difference, \$38,844.36, represents a low estimate of the itemizable activity that was not itemized.

The Committee did not dispute this finding in its response to the IAR and stated that it will file amendments. The Committee did not file amendments with the response nor as of April 1, 1992.

Based on the above, the Commission determined to take no further action.

Recommendation #5

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

B. Itemization of Contribution Refunds

Section 434(b)(5)(E) of Title 2 of the United States Code requires a political committee to report the name and address of each person who receives a contribution refund or other offset to contributions from the reporting committee where such contribution was reported under paragraph (3)(A) of this subsection, together with the date and amount of such disbursement.

Section 104.8(d)(4) of Title 11 of the Code of Federal Regulations states that if a contribution is refunded to the contributor, the treasurer of the political committee making the refund shall report the refund on Schedule B of the report covering the reporting period in which the refund is made.

The Audit staff reviewed JJFP-CA disbursements and identified 28 refunds of contributions to individuals, totaling \$2,725.50, which were not itemized as required. Eleven of these refunds related to contributions which were submitted for matching funds (see Finding VI.B.).

In the interim audit report the Audit staff recommended that within 30 days of service of that report, JJFP-CA file amended Schedules B-P to itemize the refunds noted above.

In its response to the IAR, the Committee stated that it would file amendments to correct the reporting of the contribution refunds. Neither the Committee nor JJFP-CA filed amendments with the response or as of April 1, 1992.

Based on the above, the Commission determined to take no further action.

Recommendation #6

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

C. Request for Additional Information - Union Bank and Bank of Los Angeles

Section 432(c) of Title 2 of the United States Code states, in part, that the treasurer of a political committee shall keep an account of all contributions received by or on behalf of such political committee, the name and address of any person who makes any contribution in excess of \$50, and the identification of any person who makes a contribution or contributions aggregating

more than \$200 during a calendar year, together with the date and amount of any such contribution. In addition, the treasurer shall keep an account of the name and address of every person to whom any disbursement is made, the date, amount, and purpose of the disbursement, including a receipt, invoice, or cancelled check for each disbursement in excess of \$200.

Section 9033.1(b)(5) of Title 11 of the Code of Federal Regulations states, in part, that the candidate and the candidate's authorized committee(s) will keep and furnish to the Commission all documentation in relation to disbursements and receipts, including any books, records (including bank records for all accounts), all documentation required by this section including those required to be maintained under 11 C.F.R. §9033.11, and other information that the Commission may request.

The JJFP-CA maintained two bank accounts during the audit period: Bank of Los Angeles from December 23, 1987, until termination and Union Bank from inception through April 6, 1988. JJFP-CA did not provide Union Bank documentation for the period from inception through October 5, 1987. Therefore, the Audit staff was unable to include bank activity prior to October 6, 1987 in the reconciliation of JJFP-CA bank accounts to reported receipts and disbursements. Further, no bank documentation was provided for Bank of Los Angeles from September 30, 1988, until closure.

In the interim audit report the Audit staff recommended that within 30 days of service of that report, JJFP-CA provide to the Audit staff all bank records, including statements, cancelled checks, debit and credit memoranda, and deposit batches pertinent to making a complete review of bank activity, receipts, and disbursements prior to October 6, 1987 for Union Bank and subsequent to September 30, 1988 for Bank of Los Angeles. The Audit staff stated that the Commission had issued a subpoena to the Bank of Los Angeles relative to the documentation requested. The Audit staff noted that further recommendations may be forthcoming based on review of the documentation received.

The requested documentation was materially supplied by records provided by the Committee in response to the interim audit report and by the subpoena issued by the Commission.

Recommendation #7

The Audit staff recommends no further action on this matter.

IV. New Yorkers for Jesse Jackson '88 ("NYJJ") - Findings and Recommendations Related to Title 2 of the United States Code

A. Itemization of Refunds and Rebates

Section 434(b)(3)(F) of Title 2 of the United States Code states that each report shall disclose the identification of

each person who provides a rebate, refund or other offset to operating expenditures to the reporting committee in an aggregate amount or value in excess of \$200, together with date and amount of such receipt.

Section 431(13) of Title 2 of the United States Code defines the term "identification" to mean, the case of any other person, the full name and address of such person. In addition, 2 U.S.C. §431(11) defines "Person" to include an individual, partnership, corporation, association, labor organization or committee.

NYJJ's receipt records were reviewed by the Audit staff to determine whether all offsets to expenses in the form of returns of deposits, rebates, etc. requiring itemization were itemized on its disclosure reports. The Audit staff noted that five offsets, totaling \$16,711.60, were not itemized as required; although an offset amount of \$16,710.96 was included in total reported receipts.

At the exit conference, NYJJ representatives were provided with a schedule of the above noted refunds and rebates.

In the interim audit report the Audit staff recommended that within 30 days of service of that report, NYJJ file amended Schedules A-P to itemize the refunds and rebates noted above.

Although the Committee stated in its response to the IAR that it will file amended schedules, it failed to file these amendments as of April 1, 1992.

Based on the above, the Commission determined to take no further action.

Recommendation #8

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

B. Itemization of Contribution Refunds

Section 434(b)(5)(E) of Title 2 of the United States Code requires a political committee to disclose the name and address of each person who receives a contribution refund or other offset to contributions from the reporting committee, together with the date and amount of such disbursement.

Section 104.8(d)(4) of Title 11 of the Code of Federal Regulations states that if a contribution is refunded to the contributor, the treasurer of the political committee making the refund shall report the refund on Schedule B of the report covering the reporting period in which the refund is made.

The Audit staff reviewed NYJJ disbursements and noted that on its 1988 October Quarterly report, NYJJ reported refunds to individuals totaling \$17,304.77 on Line 28(a) of the Detailed Summary of Receipts and Disbursements. These disbursements were not itemized as required on Schedules B-P. The Audit staff was unable to verify that these refunds had been made or identify the payee based upon the documentation available.

In the interim audit report the Audit staff recommended that within 30 calendar days of service of that report, NYJJ file amended Schedules B-P to itemize the refunds noted and provide documentation to support the refunds. As an alternative, the Audit staff recommended that NYJJ provide documentation demonstrating why these reported refunds should not be itemized.

In its response to the IAR, the Committee stated that it would file amendments disclosing these reported refunds. The Committee did not address the possibility that these disbursements were reported in error. Neither the Committee nor NYJJ filed amendments as of April 1, 1992.

Based on the above, the Commission determined to take no further action.

Recommendation #9

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

C. Request for Documentation

Section 432(b)(1) of Title 2 of the United States Code states that every person who receives a contribution for an authorized political committee shall, no later than 10 days after receiving such contribution, forward to the treasurer such contribution, and if the amount of the contribution is in excess of \$50 the name and address of the person making the contribution and the date of receipt. Section 432(h)(1) of this Title states, in relevant part, that each political committee shall designate one or more depository institutions as its campaign depository or depositories and that all receipts received by such committee shall be deposited in such accounts.

Section 432(c)(5) of Title 2 of the United States Code states that the treasurer of a political committee shall keep an account of the name and address of every person to whom any disbursement was made, including a receipt, invoice, or cancelled check, for each disbursement in excess of \$200.

Section 9033.1(b)(5) of Title 11 Code of Federal Regulations states, in part, that the candidate and the candidate's authorized committee(s) will keep and furnish to the Commission all documentation in relation to disbursements and receipts including any books, records (including bank records for

all accounts), all documentation required by this section including those required to be maintained under 11 CFR 9033.11, and other information that the Commission may request.

Bank Account - Chase Lincoln First Bank

During the review of contributions from individuals, the Audit staff noted 33 deposit batches, totaling \$22,777.81, which were credited to an account at Chase Lincoln First Bank. It should be noted that neither NYJJ nor the Committee disclosed this institution as a campaign depository, in apparent violation of 2 U.S.C. Section 432(h)(1); nor did NYJJ or the Committee make available to the Audit staff any additional records relating to the account. With respect to the batches noted above, it does not appear that NYJJ reported this activity in its disclosure reports.

At the exit conference on September 11, 1990, the Audit staff requested that NYJJ provide all records relative to this account to include but not limited to bank statements, cancelled checks, deposit slips, contribution batches, debit and credit memoranda, and any ledgers relating to this activity.

On September 21, 1990, NYJJ provided deposit batches identical to those reviewed by the Audit staff during fieldwork, but did not provide any additional records relative to this account.

In the interim audit report the Audit staff recommended that within 30 calendar days of service of that report NYJJ provide the following:

- All records relative to the account at Chase Lincoln First Bank, including bank statements, cancelled checks, deposit slips, contribution batches, debit and credit memoranda, and any ledgers relating to this activity; and
- an explanation as to why the Chase Lincoln First Bank activity was apparently not reported, nor included on the Statement of Organization.

The Audit staff also noted that further recommendations may be forthcoming based on review of the records.

In response to the interim audit report the Committee provided receipts documentation, bank statements, cancelled checks, debit memoranda and a handwritten list of disbursements including some purposes for this account. No additional documentation relative to disbursements was submitted. The Committee did not address the issue concerning failure to report the activity from this account. With regard to the failure to include this account on the Statement of Organization, the Committee simply stated that this failure did not "...alter the

account's character as one exclusively associated with the campaign and used for campaign purposes."

The Audit staff reviewed the bank activity and cancelled checks and identified 24 disbursements totaling \$25,701.76 from this account that lack adequate documentation (see Finding VII.A.2.).

Recommendation #10

The Audit staff recommends no further action with regard to Title 2 Recordkeeping. Please see Finding VII.A.2. relative to Title 26 Repayments.

D. Matters Referred to the Office of General Counsel

Certain matters noted during the audit have been referred to the Office of General Counsel.

V. Jesse Jackson for President '88 Committee - 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.

The Regulations at 11 C.F.R. §9038.2(b)(2)(iii) state 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.

Pursuant to 11 C.F.R. §9033.5(c), the Commission determined Reverend Jackson's date of ineligibility to be July 20, 1988.

Based on additional documentation submitted by the Committee as part of its response to the interim audit report, the Audit staff revised the calculation of the repayment ratio as presented in that report.

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

Total Matching Funds Certified through the Date
of Ineligibility - July 20, 1988

Numerator plus Private Contributions Received through
Date of Ineligibility

\$5,851,681.76

= .310056

\$5,851,681.76 + \$13,021,285.95

Thus, the repayment ratio for non-qualified campaign expenses is 31.0056%.

B. Apparent Non-Qualified Campaign Expenses - Penalties
and Apparent Non-Campaign Related Travel

Section 9032(9)(A) and (B) of Title 26 of the United States Code defines, in part, the term "qualified campaign expense" as a purchase or payment incurred by or on behalf of a candidate or his authorized committee made in connection with his campaign for nomination which neither the incurring of nor payment of constitutes a violation of any law of the United States or of the state in which the expense is incurred or paid.

Section 9038.2(b)(2)(i) and (ii) of Title 11 of the Code of Federal Regulations states, in relevant part, that the Commission may determine that amounts of any payments made to a candidate from the matching payment account were used for purposes other than to defray qualified campaign expenses. Further, examples of Commission repayment determinations include, but are not limited to, determinations that funds were expended for expenses resulting from a violation of state or federal law, such as the payment of fines or penalties.

From a review of selected disbursements, the Audit staff identified one payment to Jesse Jackson, Jr. (apparently the candidate's son), totaling \$10,659.45, which, based upon documentation provided by the Committee in support of this disbursement, was reimbursement for hotel and banquet charges with respect to a trip to Puerto Rico from June 23, 1988 to June 26, 1988. The apparent dates of this trip were well after that primary (as well as after all primaries) and the trip does not, in the Audit staff's opinion, appear to be campaign related. In addition, the Audit staff identified 11 payments, totaling \$61,126.79, which were made to satisfy tax penalties assessed by taxing authorities for late filings.

At the exit conference, Committee representatives were provided with a schedule detailing these items.

In the interim audit report, the Audit staff recommended that within 30 calendar days of service of this report, the Committee submit documentation which demonstrates that the expenses noted above are qualified campaign expenses. Absent such a demonstration, the Audit staff will recommend that the Commission make an initial determination that the Committee make a pro rata repayment of \$22,304.77 to the U.S. Treasury pursuant to 26 U.S.C. §9038(b)(2).

The Committee responded to the interim audit report by providing documentation demonstrating the qualified nature of the payment to Jesse Jackson, Jr. (\$10,659.45). The Committee's response did not address the payments (\$61,126.79) made to satisfy tax penalties. See Attachment 1.

Recommendation #11

On April 9, 1992, the Commission made an initial determination that the \$61,126.79 in tax penalties are non-qualified campaign expenses; and that the Committee make a pro rata repayment of \$18,952.73 ($\$61,126.79 \times .310056$) to the United States Treasury pursuant to 26 U.S.C. §9038(b)(2).

C. Apparent Non-Qualified Campaign Expenses - Undocumented Expenditures

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 CFR 9033.11. The amount of any repayment sought under this section shall be determined by using the formula set forth in 11 CFR 9038.2(b)(2)(iii).

Section 9033.11(a) 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.

The Audit staff reviewed Committee disbursements made from National and State accounts and noted in the interim audit report that disbursements totaling \$926,885.17 were not documented in accordance with 11 C.F.R. §9033.11(b). The undocumented disbursements were detailed in the interim report as follows:

1. National Accounts

During the review of disbursements made from National accounts, the Audit staff noted 141 disbursements, totaling \$808,084.99, for which documentation was insufficient to allow for a determination as to whether or not the disbursements were qualified campaign expenses. The problem areas identified were as follows:

a. Payments to Individuals

The Audit staff tested disbursements from the National accounts on a sample basis and identified non-payroll payments to individuals as a problem area with respect to maintaining adequate documentation. Further review by the Audit staff resulted in the identification of 40 disbursements, totaling \$41,205.19, which lacked sufficient documentation in accordance with 11 C.F.R. §9033.11. At the exit conference, the Committee was provided a schedule detailing these disbursements.

b. Cash

The Audit staff reviewed checks made payable to cash and identified 70 disbursements, totaling \$48,507.97, for which adequate documentation was not available to determine if the disbursements were for qualified campaign expenses. At the exit conference, the Committee was provided with schedules detailing these disbursements.

c. Selected Disbursements

The Audit staff reviewed other selected disbursements and identified 29 disbursements, totaling \$673,278.23, for which documentation was insufficient to determine if they were qualified campaign expenses in accordance with 11 C.F.R. §9033.11. At the exit conference, the Committee was provided a schedule detailing these disbursements.

d. Bank Debit Memos

The Audit staff's review of debits on bank statements identified two disbursements, totaling \$45,093.60, for which no documentation was available.

2. State Accounts

All disbursements from State accounts were reviewed by the Audit staff for 1987 and reviewed on a sample basis for 1988. The 1987 review identified 59 disbursements, totaling \$21,861.19, which lacked sufficient documentation. At the exit conference, the Committee was given schedules detailing these disbursements.

From the sample review for 1988, the Audit staff identified 11 State accounts as problem areas with respect to maintaining adequate documentation. The Audit staff reviewed these 11 accounts and noted disbursements, totaling \$96,938.99, which lacked adequate documentation. These 11 state accounts were as follows: (1) Lansing, Michigan (\$5,047.25); (2) Mississippi (\$5,051.00); (3) New Hampshire (\$9,108.00); (4) New Mexico (\$27,830.53); (5) Cleveland, Ohio #2 (\$8,415.50); (6) Oklahoma (\$1,719.23); (7) Portland, Oregon (\$4,920.45); (8) Rogue County,

Oregon (\$625.70); (9) Philadelphia, Pennsylvania (\$10,188.14); (10) Austin, Texas (\$15,829.13); and (11) Virginia (\$8,204.06). At the exit conference, the Committee was provided with schedules detailing these disbursements.

In the interim audit report the Audit staff recommended that within 30 calendar days of service of that report, the Committee submit documentation to demonstrate that the expenses noted above are qualified campaign expenses. 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 \$287,993.42 to the United States Treasury pursuant to 26 U.S.C. §9038(b)(2).

Response by Committee

The Committee responded to the interim report by submitting affidavits from payees, receipted bills, invoices, contracts, cancelled checks, and other documentation. The Audit staff reviewed the documentation provided and determined that the disbursements detailed below totaling \$513,328.69 were not documented in accordance with 11 C.F.R. §9033.11(b). The adjustments to the interim report are detailed as follows:

1. National Accounts

The Committee submitted documentation to support the qualified nature of disbursements totaling \$376,969.11. The Committee did not provide documentation to support adequately the qualified nature of the remaining 76 disbursements totaling \$431,115.88 identified in the interim report. The Committee addressed the following areas:

a. Payments to Individuals

The Committee provided documentation adequate to support the qualified nature of 30 disbursements totaling \$22,860.45. For the remaining 10 disbursements totaling \$18,344.74 the Committee failed to provide documentation to support the qualified campaign nature of these expenses. See Attachment 2. For these disbursements the Committee either did not respond or submitted only explanations expanded with regard to the purposes of the disbursements. No information was provided by the payees.

b. Cash (National and State accounts)

The Committee provided documentation and identified duplicated items to support adequately 13 payments to cash or apparent exchange for cash totaling \$10,687.70. Fifty-two disbursements (consolidated from 57 line items in the interim report) totaling \$37,820.27 payable to cash or an apparent exchange for cash remain undocumented. For five disbursements the Committee provided explanations which were determined by the Audit

staff to be inadequate. For the remaining 47 items no adequate documentation was submitted. See Attachment 3.

c. Selected Disbursements

The Committee provided invoices or vendor statements to support fully the qualified nature of 15 disbursements (and partial support for another disbursement) totaling \$298,327.36 identified in the interim audit report. Fourteen disbursements totaling \$374,950.87 lack adequate support. See Attachment 4. One undocumented amount (\$16,646.54) represents refunded balances or credits by a vendor which the Audit staff was unable to trace to Committee deposit records. Ten disbursements totaling \$322,626.88 were unsupported by cancelled checks, debit memoranda, or vendor statements. Three disbursements totaling \$35,677.45 to individuals lack documentation (invoices or receipted bills) to demonstrate campaign relatedness.

d. Bank Debit Memos

The Committee submitted documentation to support fully two debits on bank statements totaling \$45,093.60 for which no documentation was available prior to the interim audit report.

2. State Accounts

For 1987 the Committee responded to the interim report by providing documentation to support 5 disbursements totaling \$1,063.34 out of 59 disbursements totaling \$21,861.19 identified by the Audit staff. The Committee did not address the remaining 54 disbursements totaling \$20,797.85. See Attachment 5.

For 1988 the Committee responded to the interim report by providing documentation to support the qualified nature of disbursements totaling \$35,524.03 identified from 11 state accounts in the interim report. For the remaining disbursements totaling \$61,414.96 from 10 state accounts, the Committee either did not respond or provided documentation which did not support adequately the expense. See Attachment 6.

Therefore, based upon our review of the Committee's response to the interim audit report as detailed above, the Audit staff has included in the repayment calculation for undocumented non-qualified campaign expenses, payments totaling \$513,328.69 (\$18,344.74 + \$37,820.27 + \$374,950.87 + \$20,797.85 + \$61,414.96).

Recommendation #12

On April 9, 1992, the Commission made an initial determination that the above noted disbursements totaling \$513,328.69 are non-qualified campaign expenses and that the

Committee make a pro rata repayment of \$159,160.64 ($\$513,328.69 \times .310056$) to the U.S. Treasury pursuant to 26 U.S.C. §9038(b)(2).

D. Apparent Non-Qualified Campaign Expenses - Unreconciled Payments to Media Vendor

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(a) 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.

The Audit staff reviewed records of payments made to the media vendor for the Committee and attempted to reconcile these payments with the amounts invoiced from the vendor. The invoices provided by the Committee covered media expenses paid and commissions charged by the media firm between February 12, 1988 and June 20, 1988.

In the interim audit report the Audit staff identified a \$60,000 payment from the media firm to the Committee's New Jersey state account which, based upon our analysis at that time, appeared to be a prohibited contribution. The Audit staff recommended that the Committee demonstrate that the payment was not a prohibited transaction. In response to the interim report the Committee identified an additional \$75,000 payment made to the media firm, and thus established that the \$60,000 payment was a refund of excess monies paid to the media firm. In addition, the Audit staff identified another \$150,000 payment made to the media firm, for a total of \$225,000 not discussed in the interim report.

The Audit staff incorporated the additional payments into the reconciliation of payments and invoiced amounts. The Audit staff identified payments to the media vendor totaling \$3,029,502.48. In addition we traced payments for media by the media firm to invoices issued the Committee. The total amount invoiced the Committee relative to these media buys was \$2,784,023.14, including commissions. Thus, the media firm received and deposited \$245,479.34 in excess of the total amount invoiced to the Committee, based on our review of records made available. Therefore, even after considering the \$60,000 refund payment to the New Jersey state account, it appears that the Committee overpaid the media vendor by \$185,479.34.

In response to the interim audit report finding relative to the \$60,000 transfer, the Committee adequately responded, and acknowledged that a discrepancy still remains with regard to the

amount held by the media vendor for the campaign. The Committee indicated in its response that it will seek a conclusive clarification of the financial history of the vendor's account.

It is the opinion of the Audit staff, pending further documentation and reconciliation of the media account activity with Committee payments, that the apparent overpayment should be considered a non-qualified campaign expense.

Recommendation #13

On April 9, 1992, the Commission made an initial determination that the \$185,479.34 in apparent overpayments to the media vendor are non-qualified campaign expenses, and that the Committee make a pro rata repayment of \$57,508.98 (\$185,479.34 x .310056) to the U.S. Treasury pursuant to 26 U.S.C. §9038(b)(2).

E. Matching Funds Received in Excess of Entitlement

Section 9038(b)(1) of Title 26 of the United States Code states, in part, that if the Commission determines that any portion of the payments made to a candidate from the matching payment account was in excess of the aggregate payments to which such candidate was entitled, it shall notify the candidate, and the candidate shall pay to the Secretary an amount equal to the amount of excess payments.

Section 9038.2(a)(1) of Title 11 of the Code of Federal Regulations states, in part, that a candidate who has received payments from the matching payment account shall pay the United States Treasury any amounts which the Commission determines to be repayable under this section.

Section 9038.2(b)(1)(i) and (iii) of Title 11 of the Code of Federal Regulations states, in part, that the Commission may determine that certain portions of the payments made to a candidate from the matching payment account were in excess of the aggregate amount of payments to which such candidate was entitled. Examples of such payments include payments made to the candidate after the candidate's date of ineligibility where it is later determined that the candidate had no net outstanding campaign obligations as defined in 11 C.F.R. §9034.5; and payments or portions of payments made on the basis of matched contributions later determined to have been non-matchable.

Excessive Portions of Contributions and Refunded Contributions Submitted for Matching

The Audit staff reviewed excessive contributions to determine if any of the excessive portions of these contributions were submitted for matching. This review indicated that the Committee submitted for matching portions of 79 contributions that, when aggregated with other contributions from the same contributor, exceed the \$1,000 limitation. For example,

Contributor A made a \$1,000 contribution to the Committee in January 1987 and a \$250 contribution in June 1987. The Committee submitted for matching the \$250 contribution and received matching funds totaling \$250.00.

It is the opinion of the Audit staff that the \$250 contribution made in June 1987 from Contributor A is not matchable pursuant to 11 C.F.R. §9034.3(e), which states that contributions which are made or accepted in violation of 2 U.S.C. §441a are not matchable. In 17 of the 79 instances, the excessive contributions submitted for matching were also refunded to the contributors.

Matching funds, totaling \$10,750.50, were requested relative to 79 contributions (or portions thereof) mentioned above. After review, the Commission certified as matchable \$9,524.08 of the \$10,750.50 requested.

In the interim audit report, the Audit staff stated that unless evidence to the contrary was provided within 30 calendar days of service of that report, the Audit staff would recommend that the Commission make an initial determination that the Committee make a repayment of \$9,524.08 to the United States Treasury.

In its response to the interim audit report, the Committee stated that it does not contest the Audit staff recommendation.

Recommendation #14

On April 9, 1992, the Commission made an initial determination that the Committee make a repayment of \$9,524.08 to the United States Treasury pursuant to 26 U.S.C. §9038(b)(1).

F. Determination of Net Outstanding Campaign Obligations

Section 9034.5(a) of Title 11 of the Code of Federal Regulations requires that within 15 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. Subsection (b) of this section states that the total of outstanding campaign obligations shall not include any accounts payable for nonqualified campaign expenses.

In addition, 11 C.F.R. §9034.1(b) states, in part, that if on the date of ineligibility a candidate has net outstanding campaign 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.

Reverend Jesse Jackson's date of ineligibility was July 20, 1988. The Audit staff reviewed the Committee's financial activity through September 30, 1991, as well as activity relative to the two authorized committees, analyzed winding down costs, and prepared the Statement of Net Outstanding Campaign Obligations ("NOCO") as of March 31, 1989, which appears below:

137019922

JESSE JACKSON FOR PRESIDENT '88 COMMITTEE
Audit Determined NOCO Statement as of March 31, 1989

Assets

Cash	\$ 51,234.26
Accounts Receivable	13,431.95
Capital Assets	123,100.00
Non-Qualified Campaign Expenses (7/21/88 - 3/31/89)	<u>145,153.24</u> 6/
TOTAL ASSETS	\$332,919.45

Obligations

Accounts Payable Qualified Campaign Expenses	(\$92,332.76)
Refunds Payable	(150,865.59)
Winding Down Costs (4/1/89 - 9/30/91)	(212,169.03) 7/
TOTAL OBLIGATIONS	<u>(455,367.38)</u>
NOCO (DEFICIT)/SURPLUS	<u>(\$122,447.38)</u>

6/ The Audit staff has adjusted the assets on this post date of ineligibility NOCO statement for non-qualified campaign expenses paid between 7/21/88 and 3/31/89 which require exclusion under 11 C.F.R. §9034.5(b).

7/ Reported activity was used to compute this amount. The Audit staff may review and adjust this figure.

The Audit staff analyzed Committee receipts subsequent to March 31, 1989 and determined that the Committee had not received matching fund payments in excess of its entitlement.

VI. JJFP-CA - Findings and Recommendations Related to Title 26 of the United States Code

A. Apparent Non-Qualified Campaign Expenses- Undocumented Disbursements

Section 9032(9) of Title 26 of the United States Code defines, in part, the term "qualified campaign expense" as a purchase or payment incurred by a candidate or his authorized committee made in connection with his campaign for nomination which neither the incurring of nor payment of constitutes a violation of any law of any state in which the expense is paid.

Section 9038.2(b)(3) of Title 11 of the Code of Federal Regulations states 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.

Section 9033.11(a) 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.

The Audit staff reviewed JJFP-CA's disbursements and identified 225 disbursements, totaling \$335,674.03, which were not documented in accordance with 11 C.F.R. §9033.11(b). The undocumented disbursements, categorized by JJFP-CA notations, are as follows:

1. Advances - Five payments, totaling \$7,840, payable for "advances".
2. Expense Reimbursement - One hundred sixty-seven disbursements, totaling \$99,497.53, to individuals for "expense reimbursement" unsupported by receipts or invoices, or travel vouchers.
3. Per Diem - Seven payments totaling \$2,495.18 to individuals for "per diem". The Audit staff was not aware of any pre-established written campaign policy regarding per diem at the close of fieldwork.
4. No Purpose - Seven payments to individuals totaling \$7,703.05 for which no purpose was noted.
5. Fee - Twenty-three payments to individuals totaling \$6,023.40 for "fee." The Audit staff was unable to determine the nature of the services provided by these individuals.

6. Payments to Various JJFP-CA Vendors - The Audit staff noted thirteen payments totaling \$209,729.87 to various vendors for services reported as phone banks, fundraising, printing, and travel for which there was no supporting documentation.
7. Reported Disbursements not Documented - The Audit staff identified three reported disbursements, totaling \$2,385, for which no bank or other documentation is available.

As part of the interim audit report the Audit staff provided attachments specifically identifying the disbursements noted above.

In the interim audit report, the Audit staff recommended that within 30 calendar days of service of that report, JJFP-CA submit documentation which demonstrates that the expenses noted above are qualified campaign expenses. 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 \$104,297.61 to the United States Treasury pursuant to 26 U.S.C. §9038(b)(2).

Response by Committee

The Committee responded to the interim audit report by submitting documentation which included copies of invoices, receipted bills, cancelled checks and check requisition forms. Based on a review of the documentation submitted, the Audit staff determined the following:

1. Advances - no documentation was submitted by the Committee in support of these five payments which totaled \$7,840. (see Attachment 7, Part A.)
2. Expense Reimbursement - The Committee submitted documentation to support the qualified nature of 116 payments totaling \$47,673.07. For the remaining 51 payments, which totaled \$51,824.46, no documentation was submitted for 49 of these payments; and, for two payments the documentation submitted was determined by the Audit staff not to be adequate. (see Attachment 7, Part B.)
3. Per Diem - Documentation to support the qualified nature of five payments (\$1,175) was provided by the Committee. For the remaining two payments, which totaled \$1,320.18, no documentation was submitted. (see Attachment 7, Part C.)
4. No Purpose - Documentation to support the qualified nature of one payment (\$509) was submitted by the

Committee. For the remaining six payments, which totaled \$7,194.05, no documentation was submitted. (see Attachment 7, Part D.)

5. Fee - Documentation to support the qualified nature of twenty payments (\$5,187.90) was submitted by the Committee. For the remaining three payments, which totaled \$835.50, no documentation was submitted. (see Attachment 7, Part E.)
6. Payments to Various JJFP-CA Vendors - Documentation to support the qualified nature of nine payments, as well as to partially support one payment, was submitted by the Committee for payments totaling \$159,635.93. No documentation was submitted for four payments (to include the unsupported portion of one item), totaling \$50,093.94. (see Attachment 7, Part F.)
7. Reported Disbursements not Documented - Documentation to support the qualified nature of all three payments (\$2,385) was submitted by the Committee.

Therefore, based upon the Committee's response to the interim audit report as detailed above, the Audit staff has included in the repayment calculation for undocumented non-qualified campaign expenses 71 payments, totaling \$119,108.13 (\$7,840 + \$51,824.46 + \$1,320.18 + \$7,194.05 + \$835.50 + \$50,093.94). See Attachment 7.

Recommendation #15

On April 9, 1992, the Commission made an initial determination that the \$119,108.13 in undocumented expenditures are non-qualified campaign expenses; and that the Committee make a pro rata repayment of \$36,930.19 ($\$119,108.13 \times .310056$) to the United States Treasury pursuant to 26 U.S.C. §9038(b)(2).

B. Matching Funds Received in Excess of Entitlement - Refunded Contributions Submitted for Matching

Section 9038(b)(1) of Title 26 of the United States Code states, in part, that if the Commission determines that any portion of the payments made to the candidate from the matching payment account was in excess of the aggregate amount of payments to which such candidate was entitled, it shall notify the candidate, and the candidate shall pay to the Secretary an amount equal to the amount of excess payments.

Section 9038.2(a)(1) of Title 11 of the Code of Federal Regulations states, in part, that a candidate who has received payments from the matching payment account shall pay the United

States Treasury any amounts which the Commission determines to be repayable under this section.

Section 9038.2(b)(1)(iii) of Title 11 of the Code of Federal Regulations states, in part, that the Commission may determine that certain portions of the payments made to a candidate from the matching payment account were in excess of the aggregate amount of payments to which such candidate was entitled. An example of such excessive payments include payments or portions of payments made on behalf of matched contributions later determined to have been non-matchable.

The Audit staff reviewed the refunds of contributions to determine if those contributions had been submitted for matching funds. In 11 instances, these refunds represented an amount which, either in part or in full, had been submitted for matching funds.

For example, contributor A made a \$250 contribution to JJFP-CA in April which was then submitted for matching funds. In June, JJFP-CA then refunded \$250 to the contributor. This would result in a percentage of the refunded \$250 matched and thus represents funds received in excess of entitlement and repayable to the United States Treasury pursuant to 11 C.F.R. §9038.2(b).

The refunded contributions mentioned above were submitted for \$928 and were matched for \$672.41.

In the interim audit report the Audit staff recommended that JJFP-CA demonstrate within 30 calendar days of service of that report that it has not received matching funds in excess of its entitlement. Absent such a demonstration the Audit staff stated that it would recommend that the Commission make an initial determination that the Committee make a repayment of \$672.41 to the United States Treasury.

The Committee stated in its response to the interim report that it "...does not contest the facts or conclusions of law reflected in this recommendation."

Recommendation #16

On April 9, 1992, the Commission made an initial determination that the Committee make a repayment of \$672.41 to the United States Treasury pursuant to 26 U.S.C. §9038(b)(1).

VII. NYJJ - Findings and Recommendations Related to Title 26 of the United States Code

A. Apparent Non-Qualified Campaign Expenses

Section 9032(9) of Title 26 of the United States Code defines, in part, the term "qualified campaign expense" as a purchase or payment incurred by a candidate or his authorized

committee made in connection with his campaign for nomination which neither the incurring of nor payment of constitutes a violation of any law of any state in which the expense is paid.

Section 9038.2(b)(3) of Title 11 of the Code of Federal Regulations states 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.

Section 9033.11(a) 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.

1. The Amalgamated Bank of New York

During the review of disbursements from this account the Audit staff noted, in the interim audit report, that 30 disbursements to individuals totaling \$50,614.19 were insufficiently documented. NYJJ officials had described these expenditures as GOTV (Get Out the Vote) budget and GOTV operations for various localities.

At the exit conference on September 11, 1990, the Audit staff supplied NYJJ representatives with a copy of the August 1, 1990 letter which included a schedule of these apparent non-qualified campaign expenses.

In the interim audit report the Audit staff recommended that within 30 calendar days of service of that report that NYJJ submit documentation which demonstrates that the expenses noted above are qualified campaign expenses. Absent such a demonstration, the Audit staff stated that it would recommend that the Committee make a pro rata repayment of \$15,726.39 to the United States Treasury pursuant to 26 U.S.C. §9038(b)(2).

In response to the interim report the Committee provided documentation to support the qualified nature of two disbursements totaling \$2,000 identified as "24th CD GOTV Budget" and "Albany GOTV Budget". The payments were apparent advances and were supported by receipted bills for food for volunteers, supplies, mobile sound systems, political decorations, and shipping charges. The Committee did not specifically address the other disbursements in its narrative response but stated that efforts to obtain documentation were complicated by the incapacitating illness of a key employee knowledgeable of the GOTV operation and that "the nature of the operation and the number of personnel involved created impediments to complete recordkeeping." The Committee concluded its response by stating that it "...will endeavor to obtain additional documentation and forward it to the Commission".

The Audit staff now identifies 28 disbursements to individuals totaling \$48,614.19 which remain insufficiently documented. See Attachment 8.

2. Chase Lincoln First Bank

Disbursement records relative to this account were not provided to the Audit staff for review during fieldwork. In the interim audit report the Audit staff recommended that the NYJJ provide all records relative to the activity from this account. In response to the interim report the Committee submitted bank statements, cancelled checks, debit memoranda, and a handwritten list of disbursements including some purposes. Based on a review of the disbursements the Audit staff was able to determine that 16 disbursements totaling \$10,330.74 were campaign related expenses. The Audit staff determined that 24 disbursements totaling \$25,701.76 were insufficiently documented. See Attachment 9. No contemporaneous memoranda, receipted bills, vendor invoices, or signed statements from payees were submitted in support of the campaign qualified nature of these disbursements.

Recommendation #17

On April 9, 1992, the Commission made an initial determination that the \$74,315.95 (\$48,614.19 + \$25,701.76) payments noted are non-qualified campaign expenses; and that the Committee make a pro rata repayment of \$23,042.11 (\$74,315.95 x .310056) to the U.S. Treasury pursuant to 26 U.S.C. §9038(b)(2)(A).

B. 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 its efforts to encourage the payees 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 NYJJ reported activity to its bank activity through September 30, 1988 and identified 8 stale dated checks totaling \$5,114.48.

At the exit conference on September 11, 1990, the Audit staff supplied NYJJ representatives with a schedule of the stale dated checks. See Attachment 10.

In the interim audit report the Audit staff recommended that NYJJ within 30 calendar days of service of that report (1) provide copies of any of the checks which have now cleared the bank; (2) inform the Commission of its efforts to encourage the

payees to cash the outstanding checks or provide evidence documenting efforts to resolve these items; and (3) the Committee submit a check payable to the United States Treasury for the total amount of such checks which are still outstanding.

In the response to the interim report the Committee stated that it

"...does not contest the Commission's account of facts relating to stale-dated Committee checks, but it does note that any repayment should be proportionate to federal matching funds actually received. Therefore, the Committee does not believe that the 'total amount' of all the outstanding checks is payable to the United States Treasury."

The Committee offered no further comments relative to the recommendation presented in the interim report.

In the opinion of the Audit staff the Committee's position regarding a pro rata repayment has no merit. The regulation is clear with regard to payment of the total amount of stale dated checks. Further, the rationale in support of the regulation is, by making a payment to the United States Treasury, such payment would preclude acceptance of prohibited or excessive contributions from vendors.

The Committee did not submit a check payable to the United States Treasury for any amount relative to this finding.

Recommendation #18

On April 9, 1992, the Commission made an initial determination that the Committee make a payment of \$5,114.48 to the United States Treasury pursuant to 11 C.F.R. §9038.6.

VIII. Amounts Repayable to the United States Treasury

Presented below is a recap of the amounts subject to the repayment provisions of 26 U.S.C. §9038(b) or 11 C.F.R. §9038.6.

Finding V.B.	Apparent Non-Qualified Campaign Expenses - Penalties and Apparent Non-Campaign Related Travel	\$ 18,952.73
Finding V.C.	Apparent Non-Qualified Campaign Expenses - Undocumented Expenditures	159,160.64
Finding V.D.	Apparent Non-Qualified Campaign Expenses - Unreconciled Payments to Media Vendor	57,508.98
Finding V.E.	Excessive Portions of Contributions and Refunded Contributions Submitted for Matching	9,524.08
Finding VI.A.	Apparent Non-Qualified Campaign Expenses - Undocumented Disbursements (JJFP-CA)	36,930.19
Finding VI.B.	Matching Funds Received in Excess of Entitlement - Refunded Contributions Submitted for Matching (JJFP-CA)	672.41
Finding VII.A.	Apparent Non-Qualified Campaign Expenses (NYJJ)	23,042.11
Finding VII.B.	Stale Dated Committee Checks (NYJJ)	<u>5,114.48</u>
	TOTAL	<u>\$310,905.62</u>

It should be noted that these amounts are based on information made available as of November 7, 1991 and may be subject to change.

JESSE JACKSON FOR PRESIDENT '88 COMMITTEE
Non-Qualified Campaign Expenditures - State - 1988

Payee	Check Date	Check Number	Check Amount	Purpose Code
Loretta Brewer	2/19/88	10	70.54	8021
Annette Rainwater	3/04/88	1014	350.00	8012
William Jackson	3/15/88	1027	320.00	8005
Rev Nathaniel Whitt	3/15/88	1029	200.00	8005
Christian Montique	3/15/88	1030	350.00	8005
Gary Shrevebury	3/23/88	1066	159.12	8005
Michael McEdden	3/23/88	1067	150.00	8006
Stephanie Bass	3/23/88	1070	250.80	8017
Eddie McDonald Jr.	3/25/88	1077	740.00	8006
Eddie McDonald Jr.	3/25/88	1078	125.00	8016
Claudia Saot	3/28/88	1093	200.00	8005
Rev Nathaniel Whitt	3/28/88	1099	300.00	8005
James Franklin	4/15/88	1125	135.00	8008
Brian Martin	4/18/88	1128	612.50	8005
Mary Holmes	6/24/88	1156	64.29	8008
Subtotal - Michigan - 1988			\$4,227.25	
Dennis Williams	2/25/88	134	175.00	8018
Molly Foxx	2/27/88	138	100.00	8008
Shirley Smith	2/28/88	140	200.00	8008
Lord Hester	2/29/88	144	100.00	8008
Hollis Watkins	3/18/88	143	100.00	8017
Dennis Williams	3/02/88	147	100.00	8021
Brenda Mathis	3/02/88	151	200.00	8005
Steve Mahara	3/05/88	158	100.00	8006
Crandall Smith	3/06/88	167	100.00	8005
Firr Smith	3/08/88	178	100.00	8021
Water Gardner	3/07/88	181	100.00	8008
Janett Self	3/08/88	182	300.00	8008
Nettie Moore	3/07/88	183	150.00	8008
Floretta Johnson	3/08/88	185	100.00	8008
C J Jones	3/07/88	187	100.00	8008
Doris Upkins	3/08/88	188	150.00	8008
Sidney Jaes	3/07/88	190	100.00	8008
Velveline Johnson	3/07/88	192	200.00	8008
Barney Schoby	3/07/88	195	200.00	8008
Greg Flypms	3/07/88	200	150.00	8008
Marzell Clayton	3/08/88	204	100.00	8008
Clint Wilson Jr.	3/10/88	212	155.00	8017
Leslie Barkerville	3/10/88	213	310.00	8012
Tommie Bass	3/10/88	215	100.00	8005
Louis Armstrong	3/26/88	224	86.00	8021
Mary Foster	7/15/88	234	250.00	8008
Velveline Johnson	7/19/88	237	100.00	8008
Louis Armstrong	7/15/88	238	200.00	8021
Reginald Danzel	7/19/88	240	400.00	8013
Atty Johnny Walls	7/19/88	2411	121.11	8004
Atty Johnny Walls	7/19/88	2412	78.89	8004
Eugene Fouche	7/19/88	242	100.00	8008
Mildred Webster	6/23/88	232	200.00	8005
Subtotal - Mississippi - 1988			\$5,026.00	

Clyde Williamson	1/01/88	128	790.00	8017
John Shayeb	1/07/88	137	200.00	8004
Linda Long	1/07/88	139	100.00	8004
Mike Weddle	1/07/88	140	100.00	8004
Scott Nova	1/15/88	156	100.00	8001
Andy Grossman	1/19/88	169	70.00	8008
Andy Grossman	1/25/88	181	60.00	8021
Andy Grossman	1/28/88	198	675.00	8017,8021
Deanne Grimaldi	1/30/88	203	84.00	8008
Carol Jestin Smith	1/30/88	206	541.00	8008
Ian Hobbs	1/30/88	207	308.00	8008
Sahidi Nguvu	2/20/88	231	850.00	8008
Chuck Weed	2/12/88	284	125.00	8008
Andy Grossman	2/09/88	285	100.00	8021
Shakoor Aljuwani	2/15/88	294	1,500.00	8008
Al Baxter	2/18/88	300	750.00	8008
Carol Jestin	2/20/88	230	455.00	8008
Paul Meyer	2/19/88	241	225.00	8001
Andy Grossman	1/28/88	199	375.00	8017

Subtotal - New Hampshire - 1988 \$7,408.00

Cash/Jerome Al Davis	5/03/88	214	90.00	8005
Cash/Jon Ferrell	5/03/88	225	150.00	8008
Cash/Sabra Scott	5/03/88	226	120.00	8018
Cash/Erika McQuire	5/03/88	227	100.00	8021
Cash/Paul M Wells/Jon Fe	5/03/88	237	4,000.00	8005
Johnny Hutton	5/23/88	11	240.00	8005
Ruby Moss-Smith	7/14/88	17	1,000.00	8008

Subtotal - Ohio - Cleveland#2 - 1988 \$5,690.00

Friedland Cudjoe	3/07/88	1034	60.00	8017
Wayne Thompson	2/23/88	1009	659.71	8018
Anita Arnold	2/25/88	1010	99.08	8017
Gladys Hill	3/08/88	1048	60.00	8005
Leonard Mikado	3/09/88	1053	125.00	8008
Wayne Thompson	3/27/88	1062	335.00	8018
Leonard Mikado	5/06/88	1079	282.74	8018
George Hamilton	5/13/88	1080	107.70	8017

Subtotal - Oklahoma - 1988 \$1,719.23

Tree Mullen	5/12/88	1191	250.00	8008
Larry Dunham	5/16/88	1215	150.00	8006
Sivedious Simington	5/17/88	1219	60.00	8005
Laura Wolford	5/18/88	1225	600.00	8005
Bob Williams	5/18/88	1228	332.45	8018
Robert Grass	2/01/88	1012	250.00	8005
Bob Boyer	4/11/88	1085	60.00	8017
Jane Voquet	6/14/88	1249	100.00	8005
James Stewart	6/14/88	1250	80.00	8008
Howard Parnell	4/25/88	1127	500.00	8009
Vicky Valdez	7/14/88	1269	500.00	8008
Glacier Tsjwall	7/14/88	1279	500.00	8008
Ramona Rank/Antone Minth	7/15/88	1282	438.00	8008
Marina Antilla	7/16/88	1286	200.00	8008

Patricia Nelson	8/14/88	1275	500.00	8008
Bob Williams	9/02/88	1272	100.00	8008
Kristen Farr	9/02/88	1276	200.00	8008
William Draft	9/02/88	1277	200.00	8008

Subtotal - Oregon - Portland - 1988 \$4,920.45

Merton Saling	1/25/88	2	98.00	8008
William T Holsen	1/31/88	102	54.00	8011
Merton Saling	2/29/88	107	54.50	8012
Merton Saling	3/08/88	111	100.00	8013
Mary Ellen Daley	4/22/88	150	99.00	8009
R L Cooper	5/10/88	160	62.00	8021
Patricia Ann Melon	6/21/88	175	80.72	8010
Mary Ann Holsen	6/15/88	247	77.48	8009

Subtotal - Oregon - Rogue County - 1988 \$625.70

Elizabeth Kinnett	4/08/88	106	275.00	8013
Randy Shannon	4/08/88	107	200.00	8013
Dan Kinney	4/08/88	108	600.00	8013
Thelma Grady	4/08/88	109	200.00	8013
Roger Johnson	4/08/88	112	300.00	8013
Randy Shannon	4/12/88	121	600.00	8008
Doris Moorehead	5/09/88	182	400.00	9005
Helene Cunningham	5/09/88	183	400.00	8004
Barbara Keith	4/18/88	136	250.00	8008
Dan Kinney	4/18/88	137	275.00	8008
Marilyn Jewett	4/18/88	138	200.00	8008
Mavis Raynor	4/18/88	139	150.00	8008
Ann Garland	4/20/88	141	800.00	8013
Nathaniel Holdker	4/25/88	152	200.00	8005
Curt Richardson	4/25/88	154	148.00	8009
Rev Mattie Pinckney	4/25/88	155	400.00	8005
Winnie Scherrer	4/25/88	156	770.00	8009
Deborah Mapper	4/25/88	157	1,500.00	8013
Rev James S Allen	4/28/88	165	205.00	8005
Florence Booker	6/02/88	203	90.14	8021
Jameson Christian Banque	4/29/88	168	80.00	8021
Al Spivey	7/15/88	222	1,045.00	8008
Rick Adams	4/08/88	113	600.00	

Subtotal - Pennsylvania - 1988 \$10,188.14

Armanda Gutierrez	1/27/88	19	300.00	8005
Grace Veillette	2/29/88	148	125.00	8008
Hobie Hukill	4/12/88	258	120.00	8011
Margo Morones	3/04/88	175	425.00	8008
Doris Hubbard	3/05/88	179	500.00	8017
Armando Gutierrez	3/05/88	180	1,460.00	8005
James Grant	3/05/88	182	125.00	8009
Armando Gutierrez	3/06/88	186	625.00	8008
Linda Velasquez	3/08/88	191	80.00	8006
Jack Slater	3/08/88	192	77.00	8006
James Grant	3/08/88	195	125.00	8017
Armando Gutierrez	3/10/88	200	3,854.12	8008
Rev M E Francis	3/10/88	207	367.66	8008

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Delia Gomez	3/10/88	208	250.00	8005
Eva Lindsey	3/10/88	209	500.00	8005
Maydee Lindsey	3/11/88	215	123.07	8010
Marla Edison	3/16/88	224	400.00	8008
Stan Scheider	3/16/88	227	1,500.00	8005
Hobie Hukill	3/18/88	237	180.00	8011,8014
Carol C Rodriguez	3/18/88	238	350.00	8008
Bill Harris	5/12/88	296	1,000.00	8013
Eva Lindsey	4/28/88	277	122.28	8005
Gladys Clark	6/19/88	335	120.00	8008
Julie White	6/22/88	345	450.00	8003
Shirley Peoples	6/22/88	346	350.00	8003
Armando Gutierrez	7/22/88	355	1,200.00	8005
Armando Gutierrez	7/22/88	356	1,200.00	8005

Subtotal - Texas - 1988

\$15,829.13

Neil Rutley	3/02/88	1023	250.00	8005
Richard Lynch	3/03/88	1028	70.00	8018
Robert Hines	3/05/88	1039	59.50	8018
Juanita Owens-Penn	3/07/88	1045	250.00	8008
Jake Holmes	3/08/88	1048	200.00	8017
Gloria Burnett	3/12/88	1051	296.56	8001
Mary E Cox	3/11/88	1057	435.00	8012
Mary E Cox	3/22/88	1066	450.00	8017
Mary E Cox	3/16/88	1067	150.00	8008
Mary E Cox	3/18/88	1073	200.00	8012
Mary E Cox	2/14/88	12	150.00	8021
Cash/Richmond Marriott	3/07/88	1046	400.00	8008
Mary E Cox	2/24/88	1001	200.00	8010
Mary E Cox	2/25/88	1004	570.00	8013
Pam Morris	2/25/88	1005	500.00	8010,8001
William G Kimbrough	1/22/88	9	70.00	8005
Bennie Pittman/P & K Cle	4/15/88	1088	50.00	8005
Gerald Thompson	4/16/88	1089	100.00	8008
Mary E Cox	4/15/88	1090	100.00	8008
Mary E Cox	4/29/88	1096	175.00	8008
Mary E Cox	5/02/88	1102	250.00	8010
Jesse Faison	5/05/88	1109	60.00	8005
Ya Sin El Aail	5/06/88	1110	250.00	8005
Mary E Cox	5/13/88	1116	150.00	8012
Mary E Cox	5/13/88	1124	100.00	8008
Mary E Cox	6/02/88	1133	85.00	8012
Mary E Cox/Yolanda Brown	7/25/88	1160	125.00	8005
Bennie Pittman	3/10/88	1056	75.00	8005

Subtotal - Virginia - 1988

\$5,781.06

Grand Total - States - 1988

\$61,414.96

Jesse Jackson for President '88 Committee - California
Non-Qualified Campaign Expenses: Undocumented^{1/}

A. Payments for Advances

<u>Name</u>	<u>Check Number</u>	<u>Check Date</u>	<u>Check Amount</u>	<u>Purpose Per Committee</u>
Chris Hammond	558	4/26/88	\$ 800.00	Exchange for Cash
Willis Edwards	656	5/02/88	2,500.00	Advance on Expenses
Ron Weathersby	1112	5/18/88	1,040.00	Exchange for Cash
Willis Edwards	1159	5/19/88	2,000.00	Advance
Willis Edwards	1556	6/03/88	1,500.00	Advance-No. Calif. GOT ^{2/}
Total			<u>\$7,840.00</u>	

B. Payments for Reimbursement of Expenses

<u>Name</u>	<u>Check Number</u>	<u>Check Date</u>	<u>Check Amount</u>	<u>Purpose Per Committee</u>
Carrie Irving	159	2/12/88	\$ 92.39	Reimbursement of Expense
Susan Cole	160	2/12/88	129.00	Reimbursement of Expense
Paul Cloutier	232	3/11/88	203.00	Reimbursement of Expense
Gene Royale	234	3/11/88	708.00	Reimbursement of Expense
Ayofemi Stowe	250	3/16/88	375.00	Reimbursement of Expense
Ella Lane	263	3/17/88	726.11	Reimbursement of Expense
Sabina Virgo	265	3/17/88	65.00	Reimbursement of Expense
Tom Bates	311	3/25/88	400.00	Reimbursement of Expense
Mario Toreo	415	4/12/88	177.50	Reimbursement of Expense
Larkin Arnold	583	4/27/88	2,200.00	Reimbursement of Expense
Chris Hammond	655	5/02/88	1,300.00	Payment of Credit Card
Gary Boze	806	5/06/88	600.00	Reimbursement of Expense
Lynn Dillard	817	5/09/88	6,000.00 ^{2/}	Reimbursement of Expense

^{1/} Except as specifically noted, no additional documentation was submitted to the Committee as part of its response to the interim audit report to demonstrate the qualified nature of these payments.

^{2/} The Audit staff determined the documentation submitted to be inadequate. The Committee provided a photocopy (front and back) of the cancelled check as well as a copy of the tissue portion of the multi-part check.

Jesse Jackson for President '88 Committee - California
Non-Qualified Campaign Expenses: Undocumented

B. Payments for Reimbursement of Expenses (continued)

<u>Name</u>	<u>Check Number</u>	<u>Check Date</u>	<u>Check Amount</u>	<u>Purpose Per Committee</u>
Gilbert Anson	856	5/13/88	600.00	Reimbursement of Expense
Stephanie Owens	914	5/13/88	151.39	Reimbursement of Expense
Larkin Arnold	929	5/13/88	1,350.00	Reimbursement of Expense
Larkin Arnold	1167	5/20/88	3,500.00	Reimbursement of Expense
Phil Wilson	1171	5/20/88	250.00	Reimbursement of Expense
Paulette Cabey	1186	5/23/88	130.00	Reimbursement of Expense
Bob Barber	1191	5/23/88	375.00	Reimbursement of Expense
Cynthia Arnold	1198	5/23/88	1,155.89	Reimbursement of Expense
Ralph White	1199	5/23/88	2,300.00	Reimbursement of Expense
Beth Brickell	1263	5/24/88	200.00	Expenses
Leo Wright	1265	5/24/88	434.09	Expenses
Rod Wright	1266	5/24/88	1,650.66	Expenses
Lynn Dillard	1347	5/27/88	3,050.77	Expenses
Chris Hammond	1406	5/31/88	2,500.00	Expenses
Charles Grindell	1415	5/31/88	322.97	Expenses
Tony Kraft	1536	6/01/88	700.00	Kay Hixson Expenses
Lyle Wing	1561	6/03/88	750.00	Expenses
Tony Wafford	1569	6/03/88	267.00	Expenses
Doris Thomas	1585	6/06/88	2,500.00	Expenses
Paul Chavez	1587	6/06/88	100.00	Expenses
Marla Edison	1593	6/06/88	2,300.00	Reimbursed Expenses
Randall Comish	1602	6/06/88	230.00	Expenses
Thelma Battieste	1624	6/06/88	253.47	Expenses
Jesse Jackson, Jr.	1652	6/06/88	1,603.45	Expenses
Minnie Talton	1963	6/21/88	1,000.00 ^{3/}	Expenses
Rod Wright	1985	6/28/88	914.57	Expenses
Chris Hammond	2068	7/11/88	700.00	Reimbursed Expenses
Evelyn Gratts	2073	7/12/88	356.00	Expenses
Lillian Mobley	2074	7/12/88	106.20	Expenses
Minnie Talton	2075	7/12/88	2,000.00	Expenses
Margaree Finklea	2092	7/13/88	274.00	Reimbursement
Mary Grafflin	2095	7/14/88	153.00	Expenses
Chris Hammond	2101	7/14/88	4,000.00	Expenses
Chris Hammond	2132	8/01/88	650.00	Expenses
Chris Hammond	2133	8/01/88	1,000.00	Expenses
Mary Henry	2148	8/30/88	200.00	Reimbursed Expenses
Chris Hammond	2149	8/30/88	750.00	Reimbursed Expenses
Mary Henry	2150	8/31/88	70.00	Expenses
Total			<u>\$51,824.46</u>	

^{3/} The Audit staff determined the documentation submitted to be inadequate. The Committee submitted photocopies of the tissue portion of multi-part checks, a check requisition form and a brief explanation.

Jesse Jackson for President '88 Committee - California
Non-Qualified Campaign Expenses: Undocumented

C. Payments for Per Diem

<u>Name</u>	<u>Check Number</u>	<u>Check Date</u>	<u>Check Amount</u>	<u>Purpose Per Committee</u>
Mike Murase	2084	7/13/88	\$ 916.18	Per Diem
Gemma Greene	2121	7/26/88	404.00	Per Diem
Total			<u>\$1,320.18</u>	

D. Payments with No Purpose Given

<u>Name</u>	<u>Check Number</u>	<u>Check Date</u>	<u>Check Amount</u>	<u>Purpose Per Committee</u>
Calvin Dupree	2102	7/18/88	\$ 200.00	None Given
Ralph White	2104	7/20/88	1,000.00	None Given
Irma Carson	2105	7/21/88	500.00	None Given
Warren Mar	2108	7/21/88	2,358.05	None Given
Larry Hendel	2109	7/21/88	2,620.00	None Given
Mabel Teng	2116	-----	516.00	None Given
Total			<u>\$7,194.05</u>	

E. Payments for Fees

<u>Name</u>	<u>Check Number</u>	<u>Check Date</u>	<u>Check Amount</u>	<u>Purpose Per Committee</u>
Norma Durkee	2036	7/01/88	465.50	Fee
Florence Schroeder	2037	7/01/88	70.00	Fee
Nate Woodward	2069	7/11/88	300.00	Fee
Total			<u>\$835.50</u>	

Jesse Jackson for President '88 Committee - California
Non-Qualified Campaign Expenses: Undocumented

F. Payments to Various Committee Vendors

<u>Name</u>	<u>Check Number</u>	<u>Check Date</u>	<u>Check Amount</u>	<u>Purpose Per Committee</u>
Ambrosia	810	5/06/88	14,000.00	Jim Butler 5/7 Event
Prince Travel	2097	7/14/88	2,357.144/	Travel
Atlanta Hilton	2099	7/14/88	20,003.00	Staff & Delegate Rooms
Prince Travel	2156	9/19/88	<u>13,733.80</u>	Travel
Total			<u>\$50,093.94</u>	
GRAND TOTAL A - F			<u>\$119,108.13</u>	

4/ The check amount was for \$10,000. In its response to the interim audit report, the Committee submitted invoices to support \$7,642.86 of this payment.

New Yorkers for Jesse Jackson '88
 Non-qualified Campaign Expenditures - Undocumented
 Amalgamated Bank of New York

Payee	Check Number	Check Date	Check Amount	Purpose per Check Voucher
Jacqueline Ward	475	4-15-88	\$8,000.00	Election Day/GOTV Operations for Brooklyn
Wendell Foster	477	4-15-88	\$4,000.00	Bronx Election Day/GOTV Operation
Charles McKinney	485	4-15-88	\$1,500.00	Manhattan GOTV
Charles McKinney	486	4-15-88	\$1,500.00	Manhattan GOTV
Das Velez	487	4-15-88	\$1,500.00	Bronx Latino GOTV Day Operation
Wilma Goodman	500	4-15-88	\$500.00	Rose GOTV Budget
Herman Keith	503	4-15-88	\$2,000.00	Westchester/Rockland Election Day/GOTV Operation
Leo Ferguson	505	4-15-88	\$500.00	Binghamton GOTV Budget
William Easton	507	4-15-88	\$500.00	Kingston GOTV Budget
Sarah Cobb	510	4-15-88	\$500.00	Cortland GOTV Budget
Sarah Cobb	511	4-15-88	\$500.00	Plattsburg GOTV Budget
Mary Bradbery	512	4-15-88	\$500.00	Niagra Falls GOTV Budget
Sarah Cobb	514	4-15-88	\$500.00	Watertown GOTV Budget
Madge Kaplan	516	4-15-88	\$1,000.00	Election Day Operators GOTV for Long Island
Madge Kaplan	517	4-15-88	\$1,000.00	Remainder mailing cost Long Island Office
Luis Pascual	524	4-16-88	\$3,000.00	GOTV Operations in Brooklyn Latino Community
Frankye Graves	693	5-02-88	\$5,000.00	Services Rendered - 4 months fundraising
Das Velez	616	4-21-88	\$200.00	4 Exit Pollsters Hourly Public
Das Velez	691	5-02-88	\$100.00	4 Pollsters
Wendell Foster	613	4-21-88	\$484.00	Petty cash - Bronx
Charles McKinney	483	4-15-88	\$1,500.00	Mar. GOTV Election Day Operations
Charles McKinney	484	4-15-88	\$1,500.00	Mar. GOTV Election Day Operations
Charles McKinney	552	4-18-88	\$2,234.00	Bronx Latino GOTV
Charles McKinney	553	4-18-88	\$2,906.00	(no purpose given)
Charles McKinney	554	4-18-88	\$1,500.00	(no purpose given)
Herman Keith	572	4-21-88	\$665.19	Reimbursement PTG Westchester Ofc
Herman Keith	636	4-25-88	\$5,000.00	Mailings - Westchester Office
Herman Keith	640	4-25-88	\$525.00	Rallies Expense Reimbursement
TOTAL NON-QUAL. CAMPAIGN EXP (28)			\$48,614.19	

New Yorkers for Jesse Jackson '88
Non-qualified Campaign Expenditures - Undocumented
Chase Lincoln First Bank of New York

Payee per check	Audit Notes	Check Number	Check Date	Check Amount	Purpose per Committee List
1 Rochester Conv. Center		9250	4/08/88	2,500.00	Site rental
2 Rochester Conv. Center		9252	4/12/88	1,000.00	Site rental
3 Trailways		9253	4/15/88	506.00	Bus rental for Press
4 Dave Christopher Harton		1001	4/18/88	150.00	Casual labor
5 B B E	1	1003	4/19/88	370.00	
6 Lloyd Anderson		1004	4/20/88	76.85	Megaphones
7 Video Awareness Rentals		1006	4/21/88	1,284.00	Equipment rental
8 Ogden Allied Services	1	1007	4/21/88	149.61	
9 Jim Landers	1	1008	4/21/88	214.00	
10 Minister Florence	1,2	1009	4/21/88	71.46	
11 Clarence Majors		1011	4/21/88	64.40	Car rental
12 James Lloyd	1,2	1016	4/21/88	250.00	
13 Robert Smith		1017	4/22/88	525.00	Canvassing
14 Monroe County Dem. Committee		1028	4/29/88	62.88	Canvassing
15 Minister Franklin Florence	2	1029	4/29/88	3,996.06	\$1885.00 catering
16 Richard Williams	1	1030	5/05/88	110.00	
17 Afro-American Club		1031	5/20/88	100.00	Catering deposit
18 Afro-American Club		1034	6/14/88	702.50	Catering
19 Viele & McCooey, CPA		1035	8/25/88	750.00	Accounting Services
20 Midcity Signs		1036	8/25/88	144.00	Signs
21 Leons		1037	8/25/88	275.00	Office Equipment
22 no check provided		1038	unknown	1,200.00	Office Rental
23 Rainbow Coalition		1039	8/25/88	1,200.00	Office Rental
24 Jesse Jackson	3	1040	9/09/88	10,000.00	Transfer of Proceeds
Total:				\$25,701.76	

Explanation of Notes:

- 1: No purpose indicated on Committee list
- 2: Payee is signatory on account
- 3: Not traced to a Committee depository

New Yorkers for Jesse Jackson '88

State Dated Checks

Reported Payee	Check Number	Check Amount	Check Date
Allen Waymore	245	\$40.00	03 23 88
Gotham Brokerage	286	\$1,925.00	03 31 88
R & L Florist	355	\$126.00	04 07 88
Broadway Famous Party	467	\$263.48	04 14 88
Timothy Careatners	490	\$375.00	04 15 88
New Yorkers for Jackson	498	\$1,500.00	04 15 88
Budget Rent-A-Car	557	\$400.00	04 19 88
Radison Hotel	883	\$485.00	07 07 88
TOTAL		\$5,114.48	

JESSE JACKSON FOR PRESIDENT '88 COMMITTEE
 Non Qualified Campaign Expenditures - States - 1987

Payee	Check Date	Check Number	Check Amount	Notes	Purpose
Betty Magness	4/28/87	not listed	100.00	1	None given
Midwest Bus. Equip.	4/28/87	925677923	635.00	1	Furniture
ABM Office Supplies	4/28/87	925677924	413.40	1	Typewriters
Display Assoc.	4/28/87	925677925	110.00	1	Office Sign
Denise Hodges	4/28/87	925677926	551.00	1	Catering
Quick Cross	4/28/87	925677928	700.00	1	Stationary
Lewis Catering	5/14/87		255.00	1	JLJ Meeting
Betty Magness	5/14/87		82.12	1	Petty Cash
Betty Magness	5/14/87		150.00	1	Petty Cash
Gloria Watkins	7/13/87	133	107.99	2	Television
Corrine Magness	8/20/87	162	100.00	2	Petty Cash
Corrine Magness	12/18/87	214	400.00	2	Travel Related
Subtotal Illinois			\$3,604.51		
Diane Welland	3/17/87	2	140.37	2	Reimburse for 2 office phones
Cash	6/06/87	79	200.00	2	Gas for mobile home-JJ visit
Anita Howe	6/25/87	94	57.00	2	Child care reimbursement
Jerome Rowan	9/10/87	224	466.00	2	BB expenses
John Else	9/21/87	249	3,000.00	2	BB promotion
Lee Mullen	9/21/87	250	250.00	2	Contracted wages
Lee Mullen	10/02/87	261	100.00	2	Contract wages
Lee Mullen	10/09/87	279	200.00	2	Contract wages
Judy Bierkamp	12/01/87	235	265.64	2	expenses
Craig Perrin	12/01/87	236	606.67	2	expenses
Loyd Ogle	12/01/87	237	291.23	2	expenses
Susan or Willard Olesen	12/01/87	238	73.20	2	Reimburse expenses
John Norris	12/01/87	239	399.58	2	Reimburse expenses
Geesman Specialty	12/02/87	245	232.35	2	none given
Adair Co. Free Press	12/02/87	246	541.60	2	none given
Carlson's Super Value	12/02/87	250	152.50	2	none given
Adair Co. Sheriff's Reserves	12/02/87	252	100.00	2	none given
Adair Co. Cattleman's Assoc.	12/02/87	253	162.00	2	none given
Greenfield Lumber Co.	12/02/87	255	233.81	2	Lumber
Howe & Olesen	12/02/87	262	52.66	2	unreimbursed expenses
Iowa Democratic Party	12/02/87	267	200.00	2	none given
Jerome Rowan	12/04/87	273	201.80	2	expenses
First Interstate Bank	12/07/87	278	150.00	2	money order
Loyd Ogle	12/07/87	282	118.30	2	heater reimbursement
Cash	12/18/87	290	2,953.45	2	payroll
Mark Winchell	12/21/87	296	250.00	2	wages
Craig Perrin	12/23/87	302	87.71	2	Expense reimbursement
Loyd Ogle	12/23/87	303	201.37	2	Expense reimbursement
Judy Bierkamp	12/23/87	304	66.13	2	Expense reimbursement
Cynthia Rowan	12/23/87	305	80.18	2	Expense reimbursement
Jeff Kusnak	12/23/87	307	55.38	2	Expense reimbursement
Jerome Rowan	12/28/87	311	170.48	2	Expense reimbursement
John Norris	12/31/87	324	300.00	2	none given
Subtotal Iowa			\$12,359.49		

1 2 3 4

Attachment 5 to
JJEP - FAK
Page 2 of 2

Gloria Channon	12/07/87	101	1,000.00	2
Gloria Channon	12/08/87	102	250.00	2
Cash(Gloria Channon)	12/23/87	109	250.00	2
Cash(Gloria Channon)	12/23/87	111	62.70	2
Paul Channon	12/24/87	115	400.00	2
Eagle Photo Supply	12/26/87	118	150.00	2
Bennet Block	12/29/87	122	300.00	2
Cash(Linda Glover)	9/18/87	7	125.00	2
Merchants Nat'l Bank	10/01/87	8	2,296.15	2
Subtotal - New Hampshire			\$4,833.85	
TOTAL - all states - 1987			\$20,797.85	

Loan reimbursement
Telephone deposit
Repay loan
Office Supplies
Kent - Office
Kent-Portsmouth
Rent-Keene HQ
Expense reimbursement
to close account

Notes: A 2:Payment request voucher
1:Paid by cashier's check, but no copies provided

Jesse Jackson for President '88 Committee
 Non-qualified (undocumented) Campaign Expenditures

Payee	Check Number	Check Date	Check Amount	Notes	Amount Undocumented
Harris Bank	4167	7/19/88	40,000.00	1	16,646.54
Marriott Marquis Hotel	DM	7/01/88	60,000.00	2	60,000.00
Progressive Direct Mail	4156	8/17/88	33,525.96	2	33,525.96
Rowe, Inc.	111	7/07/87	10,000.00	2	10,000.00
Rowe, Inc.	DM	3/25/88	33,000.00	2	33,000.00
Rowe, Inc.	DM	5/05/88	40,000.00	2	40,000.00
Rowe, Inc.	DM	6/21/88	50,000.00	2	50,000.00
Rowe, Inc.	DM	5/20/88	40,000.00	2	40,000.00
VIP Travel	DM	12/15/87	20,925.00	2	20,925.00
Chicago Hilton and Towers	3264	5/04/88	10,175.92	2	10,175.92
Hollywood Roosevelt Hotel	DM	6/03/88	25,000.00	2	25,000.00
Annette Rainwater	wire	3/24/88	10,000.00	3	10,000.00
Cash(endrsd/Wm. Anthony)	196	4/28/88	13,217.55	3	13,217.55
Cash(endrsd/Curt Richardson)	159	4/26/88	15,000.00	3	12,459.90

Total non-qualified (undocumented) campaign expenditures

\$374,950.87

Notes:

- 1: Credits and refunded balances could not be traced to Committee receipts.
- 2: No debit memo, cancelled check or vendor credit to verify receipt by vendor.
- 3: No receipts, invoices or vendor statements to support non qualified amount.

Jesse Jackson for President '88 Committee
 Non-qualified Campaign Expenses - Cash

Attachment 3 to
 JJEP - EAR
 Page 1 of 3

Payee	Check Number	Date	Amount NOCE	Notes	Account Location
Cash	1030	4/18/88	162.50		Colorado
First Commercial Bank	27	3/07/88	950.00		Arkansas
Cash	53	2/04/88	500.00		Iowa
Cash	15	1/30/88	500.00		Iowa
Cash	7	4/29/88	700.00		Illinois
Cash	J	3/13/88	800.00		Illinois
Cash	ND	2/24/88	400.00		Louisiana
Cash	CW	6/20/88	302.73		Missouri
Cash	CW	6/20/88	200.00		Missouri
Heritage NIS	2	10/01/88	200.00		Massachusetts
Cash	1	6/23/88	396.75		Nebraska
Cash	121	6/22/88	450.00		New Jersey
Cash	126	10/03/88	804.02		New Jersey
Cash	102	6/04/88	200.00		New Jersey
Cash	110	6/29/88	385.84	1	New Jersey
Cash	111	7/16/88	443.00		New Jersey
Cash	134	1/07/88	175.00		New Hampshire
JJEP	DM	9/16/88	77.14		Ohio
Cash	474	6/28/88	376.93		Ohio
Cash	483	9/14/88	313.26		Ohio
Cash	482	9/14/88	783.00	2	Ohio
Cash	485	9/23/88	1,927.00		Ohio
Cash	487	10/24/88	580.00	3	Ohio
Cash	488	10/28/88	270.00	4	Ohio
Nat'l City Bank	1	5/02/88	1,000.00		Ohio
Nat'l City Bank	2	5/03/88	4,520.00	5	Ohio
Nat'l City Bank	7	5/12/88	121.00		Ohio
Nat'l City Bank	24	8/04/88	2,000.00		Ohio
JJEP '88	102	4/28/88	1,865.81		Ohio
Cash	1005	5/17/88	796.57		Ohio
Cash	605	5/27/88	800.00		Ohio
Cash	607	6/21/88	200.00		Ohio
Cash	6	1/07/88	225.00		Virginia
Cash	1130	4/04/88	1,250.00		Washington
Cash	1165	4/12/88	1,250.00		Washington
Cash	1260	5/13/88	275.00		Washington
JJEP	159	3/01/88	250.00		Texas
Cash	19	1/27/88	300.00		Texas
Cash	120	3/08/88	800.00		Texas
Cash	3	2/19/88	300.00		Texas
Cash	DM	8/18/88	505.11		Texas
Cash	15	7/06/88	250.79		Utah
Cash	1025	3/07/88	700.00		Oklahoma
Cash	1027	3/07/88	450.00		Oklahoma
Cash	ND	7/15/88	187.17		Rhode Island
Cash	114	4/18/88	788.20		West Virginia
Cash	39	4/04/88	1,030.00		Wisconsin
Cash	1	4/23/88	281.00		Wisconsin
Cash	15	5/13/88	150.00		Wisconsin
Cash	DM	6/24/88	1,154.45		Wisconsin
JJEP		4/28/88	1,473.00		National
Harriet Obeiy Ke-el Gate		6/13/88	3,000.00	6	National

 \$37,820.27

Total undocumentated cash:

Legend: CW = Cash Withdrawal
ND = Unable to Determine
DM = Debit Memo

Notes:
1 - Check Amount = \$790.48
2 - Check Amount = \$785.00
3 - Check Amount = \$586.00
4 - Check Amount = \$544.00
5 - Check Amount = \$6,000.00
6 - State Funds per Committee notation

Jesse Jackson for President '88 Committee
Non-Qualified Campaign Expenditures - Individuals

Payee	Check Number	Date	NQCL Amount	Purpose
Frank Clover	1121	1/07/88	415.05	Reimb for computer parts
Armando Gutierrez	1129	1/08/88	2,451.98	Travel Reimbursement
Jesus Garcia	1581	1/29/88	306.00	Reimb for airfare
Marla Edison	1743	2/11/88	300.00	Travel Advance
Jerry Dixon	2130	3/01/88	750.00	Driving Bus
W. Walker	2210	3/14/88	7,250.00	Sweatshirts
Chris Hammond	3677	5/28/88	4,381.00	'for Salina Vergo'
Sheri Gault	3751	6/06/88	253.00	Reimb Travel
Roy Lewis	4168	7/19/88	781.00	Printing
May Louie	4204	7/28/88	1,456.71	Reimbursement
Total undocumented - individuals:			\$18,344.74	

Jesse Jackson for President '88 Committee
 Schedule of Non-qualified Campaign Expenses - Penalties

Description - Payee	Check number Check date	Amount
Internal Revenue Service Kansas City, MO 64999	3967 6/22/88	\$20,438.36
Internal Revenue Service Kansas City MO	004123 7/11/88	\$7,841.00
Job Service of IA	004062 7/08/88	\$3.12
Job Service of IA	004063 7/08/88	\$29.12
Internal Revenue Service	4908 11/22/88	\$2,501.66
Internal Revenue Service	4910 11/22/88	\$3,234.36
Internal Revenue Service	4913 11/22/88	\$11,753.00
Internal Revenue Service	4915 11/22/88	\$3,728.00
Illinois Department of Revenue	4917 11/22/88	\$3,336.31
Illinois Department of Revenue	4919 11/22/88	\$3,527.00
Illinois Department of Revenue	4921 11/22/88	\$4,734.86
TOTAL		----- \$61,126.79 =====

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FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

RECEIVED
F.E.C.
SECRET

MAY 23 PM 4:42

May 28, 1992

MEMORANDUM

TO: The Commission

THROUGH: John C. Surina
Staff Director

FROM: Lawrence M. Noble
General Counsel

Kim L. Bright-Coleman
Associate General Counsel

Carmen R. Johnson
Assistant General Counsel

SUBJECT: Jesse Jackson for President '88 Committee, Jackson
for President '88 Committee--California and
New Yorkers for Jesse Jackson '88 - Extension of Time
to Respond to the Final Audit Report
(LRA #365/AR-91-2)

The Commission approved the Final Audit Report on the Jesse Jackson for President '88 Committee, Jackson for President '88 Committee--California and New Yorkers for Jesse Jackson '88 (the "Committees") on April 9, 1992. The Committees' response to the Commission's initial repayment determination and Final Audit Report was due May 18, 1992.

In a letter dated May 15, 1992, the Committees request an opportunity to address the Commission in open session regarding the Final Audit Report and initial repayment determination. Attachment 2.1/ In a subsequent letter of May 22, 1992, the Committees request an extension of 43 days, until June 30, 1992, to respond to the Final Audit Report. Attachment 1. Committees' counsel Katharine R. Boyce explains that the extension is necessary for the Committees to obtain bank documentation and correspondence from former campaign personnel regarding qualified campaign expenses.

1/ The Committees' request for an oral presentation will be presented following receipt of their written response to the Final Audit Report. See 11 C.F.R. § 9038.2(c)(3).

**Memorandum to the Commission
Jesse Jackson for President '88 Committee -
Extension of Time to Respond
to the Final Audit Report (LRA #365/AR-91-2)
Page 2**

The Office of General Counsel recommends that the Commission grant an extension until June 30, 1992, to respond, so that the Committees can complete their collection of supporting documents.

RECOMMENDATIONS

The Office of General Counsel recommends that the Commission:

1. Approve a 43-day extension to allow the Jesse Jackson for President '88 Committee, Jackson for President '88 Committee--California and New Yorkers for Jesse Jackson '88 to respond to the initial repayment determination and Final Audit Report; and
2. Approve the appropriate letter notifying the Committees of the Commission's decision.

Staff assigned: Mary Tabor

Attachments

1. Committees' Request for Extension of Time to Respond to the Final Audit Report, dated May 22, 1992.
2. Committees' Request for an Oral Presentation, dated May 15, 1992.

PATTON, BOGGS & BLOW
2550 M STREET, N.W.
WASHINGTON, D.C. 20037
(202) 457-6000

TWT Telen 15780
Tel. Number 487-6348

WRITER'S DIRECT DIAL

(202) 457-6094

May 22, 1992

BY TELEFAX - (202) 219-3923

Carmen Johnson, Esq.
Office of General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: Jesse Jackson for President '88 Committee

Dear Ms. Johnson:

This letter follows up our recent conversation regarding my letter of May 15, 1992 to the Federal Election Commission requesting a hearing on the initial repayment determination made in the course of the recently completed audit of the Jesse Jackson for President '88 Committee (the "Committee") Presidential Campaign.

As we discussed, the Committee would like to continue to submit additional documentation on certain items identified by the auditors on which the Committee, believing that such documentation will be decisive, has not and may not in the future request a hearing on those particular repayment issues. So that the Committee may, in fact, submit such additional documentation, we hereby formally request an extension of time to provide such documentation. The extension is necessary to obtain, for example, bank documentation to supplement information on certain transactions for which auditors are now requesting additional backup information. Furthermore, we are in the process of corresponding with numerous former Committee personnel to request their submission of documentation regarding payments by the Committee for qualified campaign expenditures. We anticipate such additional document collection could require at least one month to complete. Therefore, we request an extension until June 30, 1992 to submit this additional documentation.

If there are any questions or additional information is needed regarding this request, please contact me at the above number.

Respectfully submitted,



Katharine R. Boyce
Counsel to Jesse Jackson for
President '88 Committee

KRB/vsa
cc: Susanne Haessler

RECEIVED
FEDERAL ELECTION
COMMISSION
ADMINISTRATIVE DIVISION
PATTON, BOGGS & BLOW
2550 M STREET, N.W.
WASHINGTON, D.C. 20037
(202) 457-6000

MAY 15 5 57 PM '92

FRT TELE 197780
TELECOPIER 457-6315

WRITER'S DIRECT DIAL

(202) 457-6094

May 15, 1992

Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: Jesse Jackson for President Committee -
Final Audit Report

5211713 PM 3:51

Dear Commissioners:

Pursuant to 11 C.F.R. § 9038.2(c) of the Commission regulations, Jesse Jackson for President Committee ("the Committee") herewith requests a hearing before the Commission on the initial repayment determination made in the course of the recently completed audit of its 1988 presidential campaign.

Scope of Issues Contested

The report of the Audit Division sets out the issues in contention. The Committee will specifically address the Commission on the following matters:

- (1) Payments to its Media Vendor, resulting in a Commission determination of an overpayment.
- (2) Adequacy of documentation provided by Committee to demonstrate "qualified" nature of certain disbursements in support of get-out-the-vote, and other operations of the Committees.
- (3) Matching of excessive contributions, with specific reference to the legal theory set out at pp. 22-23.

The Committee reserves the right to rely upon transcripts of the open Commission meeting when the report of the Audit Division was considered, for additional information about the auditors' positions on these issues. References to that transcript will be made as appropriate in the course of the hearing.

In addition, the Committee will continue to submit additional documentation on certain items identified by the

PATTON, BOGGS & BLOW

Federal Election Commission

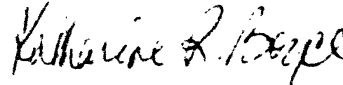
Page 2

May 15, 1992

auditors on which the Committee, believing that the forthcoming documentation will be decisive, does not request a hearing.

Should you have any questions or need additional information, please contact the undersigned.

Respectfully submitted,



Katharine R. Boyce
Counsel to Jesse Jackson for
President '88 Committee

KRB:vsa



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

2001-7-11 0:11

October 7, 1992

MEMORANDUM

TO: The Commission

THROUGH: John C. Surina
Staff Director

FROM: Lawrence M. Noble
General Counsel

Kim L. Bright-Coleman
Associate General Counsel

Carmen R. Johnson
Assistant General Counsel

Mary Tabor
Attorney

SUBJECT: Jesse Jackson for President '88 Committee, Jackson
for President '88 Committee--California and
New Yorkers for Jesse Jackson '88 --
Rescheduling of Oral Presentation (LRA 365/AR-91-2)

On September 29, 1992, the Commission approved a request by the Jesse Jackson for President '88 Committee, Jackson for President '88 Committee--California and New Yorkers for Jesse Jackson '88 ("the Committees") to postpone their oral presentation originally set for September 30, 1992. We now recommend the Commission reschedule the oral presentation for 10 a.m. on October 28, 1992.

The Commission approved the Final Audit Report on April 9, 1992. The Committees responded to the report on June 30, 1992. In the response, Katharine Boyce, counsel for the Committees, requested the opportunity to address the Commission in open session regarding the audit report and initial repayment determination. 11 C.F.R. § 9038.2(c)(3). The Commission granted that request on July 24, 1992, and set September 30, 1992, as the date for the oral presentation. The Committees requested a postponement in a letter dated September 23, 1992, and indicated they would appear before the Commission "any date from now to the end of

Memorandum to the Commission
Rescheduling of Oral Presentation
Jesse Jackson for President '88
(LRA 365/AR-91-2)
Page 2

the year, only October 21 and November 18 excepted."
Attachment. Accordingly, we recommend the Commission inform
the Committees of the new date and time set for the oral
presentation, pursuant to section 9038.2(c)(3).

RECOMMENDATIONS

The Office of General Counsel recommends that the
Commission:

1. Reschedule the oral presentation by Jesse Jackson
for President '88 Committee, Jackson for President '88
Committee--California and New Yorkers for Jesse Jackson
'88 for 10 a.m. on October 28, 1992; and
2. Approve the appropriate letter notifying the
Committee's counsel of the Commission's decision.

Attachment

Committee's Request to Reschedule Oral Presentation,
dated September 23, 1992.

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PATTON, BOGGS & BLOW
2550 M STREET, N.W.
WASHINGTON, D.C. 20037
(202) 457-6000

TELETYPE 97780
TELEPHONE 457-6315

WRITER'S DIRECT DIAL

(202) 457-6094

92 SEP 26 AM 11:15

September 23, 1992

BY HAND

Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: Repayment Hearing

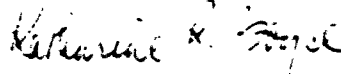
Dear Commissioners:

This is a request of the Jesse Jackson '88 Committee for rescheduling of the repayment hearing which the Commission has set for September 30, 1992.

Committee counsel could not have known that another proceeding out of town would be called for the same date. Moreover, owing to its subject matter and unique requirements, counsel is unable to obtain any consideration for an extension. The Committee, for its part, believes that it would be significantly prejudiced in the presentation of its case by any substitution of counsel, particularly with only two weeks remaining.

The Committee and its counsel recognize that this request is extraordinary and would appreciate the Commission's consideration in the matter. It is prepared to accept any date from now to the end of the year, only October 21 and November 18 excepted, which the Commission concludes is convenient for the holding of the rescheduled hearing.

Very truly yours,



Katharine R. Boyce
Counsel to Jesse Jackson '88
Committee

KRB/vsa



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

SECRET

January 26, 1993

MEMORANDUM

TO: The Commission

THROUGH: John C. Surina
Staff Director

FROM: Lawrence M. Noble
General Counsel

Kim L. Bright-Coleman *KBC*
Associate General Counsel

Carmen R. Johnson *CRJ*
Assistant General Counsel

Mary Tabor *MT*
Attorney

SUBJECT: Jesse Jackson for President '88 Committee, Jackson
for President '88 Committee--California and
New Yorkers for Jesse Jackson '88 --
Repayment Proposal (LRA 365/AR-91-2)

On January 11, 1993, the Jesse Jackson for President '88 Committee, Jackson for President '88 Committee--California and New Yorkers for Jesse Jackson '88 ("the Committees") submitted a letter requesting that the Commission accept its payment of \$75,000 prior to issuance of a final repayment determination subject to certain conditions. See Attachment 1.

Specifically, the Committees would impose the following conditions upon Commission acceptance of the check: (1) the check will be applied toward any repayment liability resulting from non-qualified campaign expenditures;1/ (2) if

1/ While the Committee's letter refers only to repayment resulting from non-qualified campaign expenditures, we pointed out and campaign personnel understand that the Commission's final repayment determination may include other bases for repayment, including matching payments received in excess of entitlement and stale-dated checks.

Memorandum to the Commission
Repayment Proposal
Jesse Jackson for President '88
(LRA 365/AR-91-2)
Page 2

the Commission determines that the Committees owe the United States Treasury less than the amount of this prepayment (plus any additional prepayments), the excessive amount will be refunded to the Committees; and (3) the Committees do not waive any rights to contest the amount of their liability by tendering the check in advance of a final repayment determination.

The Committees also acknowledge that the Commission may determine that they owe more than is being paid at this time. Finally, the Committees seek assurance that any additional payments tendered before the Commission makes a final repayment determination will be subject to the same conditions.

The Office of General Counsel recommends that the Commission accept the Committee's payment with the proposed conditions. The Commission has made similar accommodations for other publicly funded committees seeking to meet their obligations before the Commission issues a final repayment determination. See, e.g., Dukakis for President Committee (payment proposal accepted April 11, 1991); Reagan for President Committee (payment accepted January 26, 1984); and Carter/Mondale Presidential Committee, Inc. (payment accepted February 2, 1982).

We note that the \$75,000 submitted by the Committees represents only about half of the \$150,694.29 repayment amount recommended by the Audit Division and the Office of General Counsel before the Committees' oral presentation.^{2/} However, should the Commission reduce the repayment amount to less than \$75,000 based on the Committees' post-oral presentation submission, the Commission would arrange for the Treasury Department to refund the excess to the Committees. Until such time, the Committees' check has been deposited with the United States Treasury.

^{2/} On April 9, 1992, the Commission approved the Final Audit Report containing an initial repayment determination of \$310,905.62. The Committees' response to the Final Audit Report, submitted on June 30, 1992, provided documentation of qualified campaign expenses to substantially reduce the repayment amount.

Memorandum to the Commission
Repayment Proposal
Jesse Jackson for President '88
(LRA 365/AR-91-2)
Page 3

RECOMMENDATIONS

The Office of General Counsel recommends that the Commission:

1. Accept the repayment and conditions from the Jesse Jackson for President '88 Committee, Jackson for President '88 Committee--California and New Yorkers for Jesse Jackson '88 in advance of a final repayment determination; and
2. Approve the appropriate letter notifying the Committees of the Commission's decision.

Attachment

Committees' Request to Make \$75,000 Payment Prior to Final Repayment Determination, dated January 7, 1993.

PATTON, BOGGS & BLOW
2550 M STREET, N.W.
WASHINGTON, D.C. 20037
(202) 457-6000

TWT TELEX: 197780
TELECOPIER: 457-6315

WRITER'S DIRECT DIAL

(202) 457-6094

January 7, 1993

Lawrence R. Noble, Esq.
General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Dear Mr. Noble:

Enclosed please find a check in the amount of Seventy-Five Thousand Dollars (\$75,000.00) from the Jesse Jackson for President '88 Committee (the "Committee") made payable to the order of the United States Treasury (the "Treasury").

As of the date of this letter, the Federal Election Commission (the "Commission") has not made a final determination of the amount, if any, which the Committee is required to repay the Treasury as a result of non-qualified campaign expenditures and therefore the Committee is under no legal obligation to make a payment to the Treasury at this time. Pursuant to previous discussions between the Committee's accountant and the Commission's Office of the General Counsel, the Committee is willing to make a prepayment of amounts which it may owe the Treasury, subject to the express conditions set forth below. In accordance with those discussions, it is agreed and understood that if the Commission cashes the enclosed check, the Commission will be deemed to have agreed to the conditions set forth below.

The conditions are:

1. The funds represented by the check will be applied as a prepayment towards any liability which the Committee is obligated to repay the Treasury as a result of non-qualified campaign expenditures.

2. In the event that it is ultimately determined that the amount which the Committee owes the Treasury is less than the amount of this prepayment (plus any additional prepayments which the Committee may hereafter tender to the Commission), the Commission will cause the Treasury to return promptly to the

PATTON, BOGGS & BLOW

Lawrence R. Noble, Esq.
January 7, 1993
Page 2

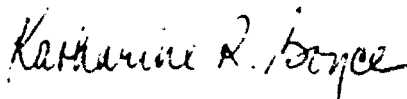
Committee the amount by which the sum of the prepayment checks exceeds the Committee's liability.

3. By tendering the enclosed check (and any subsequent prepayments), the Committee does not waive any rights it may have to contest the amount of its liability, and the fact that the Committee has tendered the enclosed check (and any subsequent prepayment checks) shall not be construed to constitute any admission against the interests of the Committee.

The Committee recognizes that the liability which it owes the Treasury as a result of non-qualified campaign expenditures may exceed the amount of its prepayment checks. Any additional checks which the Committee tenders to the Commission and expressly designates as prepayment checks shall be governed by the terms of this letter.

Please feel free to call me if you have any questions regarding these matters.

Sincerely,



Katharine R. Boyce

KRB:vsa

cc: Reverend Jesse L. Jackson
Robert F. Bauer

JESSE JACKSON FOR PRESIDENT
'88 COMMITTEE

1072

December 31 19 92

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34828

PAY
TO THE
ORDER OF

United States Treasury

\$ 75,000.00

Seventy five thousand and 00/100

DOLLARS



Suzanne Jackson
Katherine R. Boyce

FOR

⑈001072⑈ ⑆054000030⑆

⑆7098331⑈

ATTACHMENT

Page 3 of 3



FEDERAL ELECTION COMMISSION 62 100 10 PM 4:06

WASHINGTON, D.C.

April 19, 1993

MEMORANDUM

TO: The Commission

THROUGH: John C. Surina
Staff Director *JS*

FROM: Lawrence M. Noble
General Counsel *L.M.N.*

Kim L. Bright-Coleman *KBC*
Associate General Counsel

Carmen R. Johnson *CRJ*
Assistant General Counsel

Mary Tabor *MT*
Attorney

SUBJECT: Revised Final Repayment Determination and Revised Statement of Reasons for the Reverend Jesse L. Jackson, Jesse Jackson for President '88 Committee, Jackson for President '88--California, and New Yorkers for Jesse Jackson (LRA #365)

Attached for the Commission's information is the revised Statement of Reasons supporting the final repayment determination for the Reverend Jesse L. Jackson, the Jesse Jackson for President '88 Committee, Jackson for President '88--California, and New Yorkers for Jesse Jackson ("the Committees"). On April 15, 1993, the Commission approved the Statement of Reasons and ordered the Committees to repay \$47,030.91 to the United States Treasury, representing the total repayment amount of \$122,030.91 minus an earlier repayment of \$75,000.

The Office of General Counsel had proposed a repayment in the amount of \$125,441.53, based on (1) \$113,555.56 as the pro rata portion of nonqualified campaign expenses; (2) \$10,196.49 in matching funds received in excess of entitlement; and (3) \$1,689.48 in stale-dated checks. However, the Commission directed the Office of General Counsel to consider the submission of documentation by the Committees to support an \$11,000 disbursement to the Chicago Hilton and Towers, and to reduce the pro rata amount of nonqualified campaign expenses

Memorandum to the Commission
Revised Final Repayment Determination
Jesse Jackson for President '88 Committee (LRA #365)
Page 2

accordingly. In addition, at the meeting, this Office made two amendments to page 28 of the draft. The Office of General Counsel has made the revisions to comport with the Commission's determinations and has included the adjusted repayment amount in the proposed Statement of Reasons. Revisions, which are noted in the margins, occur on pages 1, 2, 13, 16, 18, 28, and 29. It should be noted that, due to the length of the document when all of the attachments are included, we are only circulating the revised Statement of Reasons and Attachment 10 (the Audit Division's memorandum, dated April 15, 1993, on the revised repayment amount). If you have any questions, please contact Mary Tabor, the attorney assigned to this audit.

Attachments

Proposed Statement of Reasons
Audit Division Comments on Revised Repayment Determination

In the Matter of)
)
 Reverend Jesse L. Jackson, Jesse)
 Jackson for President '88 Committee,)
 Jackson for President '88--California,)
 and New Yorkers for Jesse Jackson)
 Final Repayment Determination)

STATEMENT OF REASONS

On April 15, 1993, the Commission made a final determination that the Reverend Jesse L. Jackson, the Jesse Jackson for President '88 Committee, Jackson for President '88--California, and New Yorkers for Jesse Jackson ("the Committees") are ordered to repay $\langle \$122,030.91 \rangle$ to the United States Treasury, pursuant to 26 U.S.C. § 9038(b)(2). The repayment amount represents: (1) $\langle \$110,144.94 \rangle$ as the pro rata portion of nonqualified campaign expenses; (2) \$10,196.49 in matching funds received in excess of entitlement; and (3) \$1,689.48 in stale-dated checks. The pro rata portions of the nonqualified campaign expenses include: (1) \$18,952.73 in tax penalties; (2) $\langle \$46,646.13 \rangle$ in undocumented expenditures by the Jesse Jackson for President '88 Committee ("the Presidential Committee"); (3) \$26,387.36 in undocumented disbursements by Jackson for President '88-California ("the California Committee"); and (4) \$18,158.72 in undocumented

revised

revised

revised

disbursements by New Yorkers for Jesse Jackson ("the New York Committee").

On January 11, 1993, the Committees submitted a repayment check in the amount of \$75,000 to the Commission. Thus, the Committees are ordered to repay the remaining ~~(\$47,030.91)~~ to the United States Treasury. This Statement sets forth the legal and factual bases for the Commission's determination in accordance with 11 C.F.R. § 9038.2(c)(4).

revised

I. PROCEDURAL HISTORY

The Committees are the authorized committees of the Reverend Jesse L. Jackson, a candidate for the 1988 Democratic presidential nomination. The Commission approved the Interim Audit Report on May 14, 1991. Attachment 1. The Committees responded to the Interim Audit Report on September 17, 1991. Attachment 2. On April 9, 1992, the Commission approved the Final Audit Report containing an initial determination that the Committees repay \$310,905.62 to the United States Treasury. Attachment 3. The majority of the initial repayment amount, \$295,594.65, represented the pro rata portions of nonqualified campaign expenses. This amount included: (1) \$18,952.73 in tax penalties; (2) \$57,508.98 in unreconciled payments to a media firm; (3) \$159,160.64 in undocumented expenditures by the Presidential Committee; (4) \$36,930.19 in undocumented disbursements by the California Committee; and (5) \$23,042.11 in undocumented disbursements by the New York Committee. Matching funds received in excess of entitlement accounted for an additional

repayment amount of \$10,196.49. Finally, the Commission made an initial determination that the Committees must repay \$5,114.48 in stale-dated checks issued by the New York Committee.

The Committees responded to the Final Audit Report on June 30, 1992. Attachment 4. The Audit Division prepared an analysis of that response and submitted it to this Office on August 4, 1992. Attachment 5. On October 28, 1992, counsel for the Committees addressed the Commission in open session regarding the audit report and repayment determination pursuant to 11 C.F.R. § 9038.2(c)(3). See Attachment 6. On November 12, 1992, the Committees supplemented their oral presentation with a written response and additional documentation. Attachment 7. The Audit staff provided this Office with an analysis of this final submission on January 26, 1993. Attachment 8. On January 11, 1993, the Committees submitted, with certain conditions, a repayment check in the amount of \$75,000. Attachment 9. The Commission approved acceptance of the repayment check and conditions on February 1, 1993.

II. NONQUALIFIED CAMPAIGN EXPENSES

A. Tax Penalties

In the Final Audit Report, the Commission made an initial determination that the Committees must repay \$18,952.73, representing the pro rata portion of \$61,126.79 in nonqualified campaign expenses in the form of penalties assessed for late tax filings. 11 C.F.R.

§ 9038.2(b)(2)(ii)(C). The Committees did not dispute this finding. Therefore, the Commission has made a final determination that the Committees must repay this amount.

B. Adequacy of Disbursement Documentation

1. Applicable Law

The majority of the initial repayment amount for nonqualified campaign expenses resulted from the Committees' failure to provide adequate documentation to support its disbursements. Commission regulations place the burden of proving that disbursements were made for qualified campaign expenses upon the committee. 11 C.F.R. § 9033.11(a). Section 9033.11(b) of the regulations specifies the type of documentation a committee is required to present. For disbursements in excess of \$200, a committee is required to present a receipted bill from the payee that states the purpose of the disbursement or a canceled check negotiated by the payee and another specified combination of documents stating the purpose of the disbursements. 11 C.F.R. § 9033.11(b)(1). Section 9033.11(b)(1)(iv) allows a campaign to provide collateral evidence to document a qualified campaign expense when other supporting documentation is not available. This 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 such as a disbursement which is one of a number of documented disbursements relating to a campaign mailing or to the operation of a campaign office."

11 C.F.R. § 9033.11(b)(1)(iv)(A). Disbursements of \$200 or less require a canceled check negotiated by the payee, and the amount, date and purpose, if not made from a petty cash fund. 11 C.F.R. § 9033.11(b)(2)(ii). The Commission's regulations define "purpose" as "identification of the payee, the date and amount of the disbursement, and a description of the goods or services purchased." 11 C.F.R. § 9033.11(b)(3)(ii).

2. Committees' Arguments

In response to the Final Audit Report and again following the oral presentation, the Committees produced various records pertaining to previously undocumented disbursements. The Committees also make a policy argument advocating broad interpretation of the Commission regulations. In the oral presentation and subsequent written response, the Committees' counsel asks the Commission to use a different "interpretive approach" when evaluating the sufficiency of documentation provided by the Jackson Committees to demonstrate that certain disbursements were qualified campaign expenses. Attachment 6 at 64.

Counsel asserts that the Jackson campaign was unusual because it relied more heavily on individual organizers than paid political consultants to conduct activities, such as get-out-the-vote ("GOTV") drives, and those individuals were less likely than commercial vendors to provide the Committees with receipted bills, invoices or other documents generated by the payee as required by 11 C.F.R. § 9033.11(b)(1)(i-iii).

Attachment 7 at 3. In the oral presentation, the Committees' counsel referred to a Commission opinion which advised the 1984 Mondale for President primary committee that it did not need to separately report payments by the committee's consultant to entities which subcontracted services or products. Advisory Opinion 1983-25; Attachment 6 at 12. The Committees' counsel asserted that the Commission is more familiar with that type of vendor-oriented campaign and, as a result, more willing to accept receipts or other documents generated by a corporation as evidence of a qualified campaign expense. The Commission's deference to that kind of documentation prejudices the Jackson campaign, according to counsel's argument. See Attachment 6 at 65.

Thus, the Committees urge the Commission to use its discretion under 11 C.F.R. § 9033.11(b)(1)(iv) to accept as sufficient the Jackson Committees' submission of a canceled check and collateral evidence to show that expenses were related to the presidential primary campaign. The Committees aver that the term "collateral evidence" as used in 11 C.F.R. § 9033.11(b)(1)(iv)(A) is an "open-ended phrase," allowing committees to offer evidence not specifically delineated in the regulations. Attachment 6 at 11. Further, the Committees argue that they have satisfied the collateral evidence requirement by asserting that payments to individuals were part of the campaign's GOTV effort in various states. In the oral presentation, counsel questioned the need to specifically document expenditures related to a

GOTV program which is so elemental to any campaign.

Attachment 6 at 31. Moreover, counsel warns that the Commission's rejection of such collateral evidence would show a bias against "people-intensive" campaigns such as this one. Attachment 6 at 18.

The Committees offer the example of documentation related to their Ohio GOTV program, which includes check notations for purposes such as "canvass buses, food, and gas for transporting voters to the polls." The Committees assert that canceled checks to individuals involved with their GOTV program, sometimes accompanied by check-request vouchers, issued at the time of various state primaries in which Reverend Jackson was an active candidate, provide "ample evidence of 'an identified program or project . . . otherwise sufficiently documented.'" Attachment 7 at 3; Attachment 6 at 20-21.

The Committees argue that in other instances whether a disbursement constituted a qualified campaign expense is self-evident from the purpose contemporaneously noted on the face of the canceled check or from the payee's business. Attachment 7 at 3-4. For example, the Committees provide canceled checks made out to the Rochester Convention Center. The Committees state in their response following the oral presentation that "there is no reason to suppose that a campaign rents a convention site for any reason other than campaign related activity." Attachment 7 at 4. Counsel states that for checks issued to traditional political

vendors such as convention centers, direct mail houses, or sign companies, "it seems to me that it requires some countervailing evidence in the Commission's possession to raise a suspicion about it." Attachment 6 at 28.

In sum, the Committees make two basic assertions regarding documentation to establish disbursements as qualified campaign expenses. First, they argue that the Commission should broaden its acceptance of collateral evidence pursuant to 11 C.F.R. § 9033.11(b)(1)(iv)(A) in light of the Jackson campaign's heavy reliance on individual organizers rather than corporate vendors. Second, they argue that the Commission should not question disbursements documented only by canceled checks to certain vendors which on their face appear to provide goods and services logically associated with a campaign. Based upon these contentions, the Committees assert that the Commission should reduce the repayment amount to reflect the documentation which they have submitted.

3. Legal Analysis

Commission regulations governing the documentation of disbursements are designed so that presidential candidates who accept public funds also accept the burden of showing that their expenditures were made to defray qualified campaign expenses. See Explanation and Justification for 11 C.F.R. § 9033.1 (subsequently cited as 11 C.F.R. § 9033.11) 44 Fed. Reg. 20337 (April 4, 1979). The candidate must prove two elements: that the expenditure was made and that the

goods or services were purchased in connection with the campaign. See 26 U.S.C. § 9032(9)(A). The regulations provide committees with several options to demonstrate that a particular expense was campaign related. Where the supporting documentation required by 11 C.F.R. § 9033.11(b)(1)(i), (ii) or (iii) is not available, a committee has the option of presenting a canceled check and collateral evidence that the expenditure is part of an identifiable program or project otherwise sufficiently documented or evidence that the disbursement is covered by a preestablished written campaign policy. 11 C.F.R. § 9033.11(b)(1)(iv).

The Commission's allowance for certain collateral evidence to show that a disbursement is a qualified campaign expense is not an exemption for committees that do not implement an effective recordkeeping system during the primary season. Rather, collateral evidence is intended to supplement rather than substitute for documentation of qualified campaign expenses. When seeking to become eligible for matching funds, the Committees agreed to comply with the documentation requirements set forth in 11 C.F.R. § 9033.11. See Letter from Jesse Jackson, dated December 4, 1987. The Commission did not require any more elaborate documentation from the Committees than from any other publicly financed presidential committees. See, e.g., Simon for President Statement of Reasons, approved March 4, 1993 (finding that the Committee failed to document \$99,533.86 in

disbursements); Dole for President Committee, Inc., Statement of Reasons, approved February 6, 1992 (finding that the Committee failed to document \$13,470 in disbursements by delegate committees in accordance with 11 C.F.R. § 9033.11).

The audit of Friends of Gary Hart-1988, Inc. provides an apt comparison. In that case, the Commission found that the Hart Committee had materially complied with the documentation requirements by submitting evidence of a broad written per diem policy coupled with affidavits from campaign staff regarding per diem payments.^{1/} See Final Audit Report on Friends of Gary Hart-1988, Inc., approved January 25, 1990. The Committees provided no evidence of a comparable policy nor did they, in all cases, provide affidavits from the payees to support disbursements to individuals. Rather, the Committees contend that the Commission should consider expenditures to individuals as qualified campaign expenses even in the absence of affidavits from the payees. The Committees' counsel argues that documentation generated by the payee is not the only standard in the regulations. Attachment 6 at 11.

^{1/} A canceled check in combination with a broad per diem policy does not always provide adequate evidence that the expenses claimed are qualified campaign expenses. Explanation and Justification for 11 C.F.R. § 9033.11(b)(1)(iv), 56 Fed. Reg. 35904 (July 29, 1991). Therefore, the Commission has adopted new, more specific wording regarding collateral evidence for the 1992 election cycle. Id. The revisions provide that qualified campaign expenses may be documented by a preestablished written campaign policy, such as a daily travel expense policy. Id.

However, the exception for collateral evidence is much narrower than suggested by the Committees. If a committee does not have any documentation from the payee, the Commission will only consider an expenditure to be a qualified campaign expense if a number of similar expenditures have been properly documented by the payees and all relate to an identifiable campaign project. 11 C.F.R. § 9033.11(b)(1)(iv)(A). In the case of the Jackson campaign's GOTV expenditures, for example, it is not the occasional canceled check that lacks payee-generated documentation; nearly all the disbursements to individuals are supported solely by campaign-generated paperwork.

The Committees' contention that the Commission is showing bias against "people-intensive" campaigns by not accepting collateral evidence of payments to individuals simply diverts attention from the fact that the Committees did not keep proper records. The premise of the Committees' argument is that "the Jackson campaign could not afford and did not, in fact, retain large companies" to persuade voters. Attachment 6 at 12. Nevertheless, it is undisputed that the Committees hired large vendors for some activities and had a difficult time retaining records even for those vendors. For example, the Committees paid their media firm a total of \$3,029,502.48--\$185,479.34 of which was not documented by vendor invoices until after the Commission issued its Final Audit Report.

Moreover, it is inconsistent for the Committees to argue, on the one hand, that the Commission shows too much deference to vendor-generated documentation and, on the other hand, that the Commission should not question disbursements to a certain class of vendors offering commodities used in political campaigns. The Commission does not agree that in all cases in which a committee makes a disbursement to a vendor of goods or services traditionally used in a campaign that it should automatically be considered a qualified campaign expense. More than a canceled check is required under 11 C.F.R. § 9033.11(b)(1)(iv) to show a disbursement is a qualified campaign expense, even in the case of disbursements to vendors traditionally utilized during campaigns. Decisions as to whether disbursements were for qualified campaign expenses should not depend on whether the Commission recognizes the identity of the payee as a traditional campaign vendor. On the contrary, the statute and the Commission's regulations require that all disbursements be documented so that subjective conclusions based on the identity of the payee will not rule. The Committees are held to the same standards as the other 1988 presidential committees.

Nevertheless, the Commission has determined that the Committees adequately documented some expenses. Based on the Committees' response to the Final Audit Report and post-oral presentation submission, the Commission has reduced the amount of inadequately documented disbursements to a total of

$\langle \$294,115.29 \rangle$ including $\langle \$150,444.21 \rangle$ for the Presidential *revised* Committee; \$85,105.13 for the California Committee; and \$58,565.95 for the New York Committee. Based upon these adjustments, the Commission has made a final determination that the Committees must make a repayment of $\langle \$91,192.21 \rangle$ *revised* $\langle \$46,646.13 \rangle + \$26,387.36 + \$18,158.72$ to the United States *revised* Treasury, representing the pro rata portions of these inadequately documented disbursements. The following is a discussion of specific documentation submitted to the Commission to support the Committees' payments to a media vendor and disbursements made by each Jackson committee.

a. Overpayment to Media Vendor

The Commission made an initial determination that the Committees should make a pro rata repayment of \$57,508.98 to the United States Treasury representing apparent nonqualified campaign expenses in the form of \$185,479.34 in unreconciled payments to their media vendor, Gerald J. Austin & Assocs., Inc. ("Austin"). Attachment 3 at 22-23. The Commission found the Committees made payments to Austin totaling \$3,029,502.48, but only received invoices for \$2,784,023.14, leaving a difference of \$245,479.34 in unreconciled payments. A \$60,000 refund that the vendor had paid the Committees' New

Jersey state account was then deducted, leaving \$185,479.34 in apparent overpayments.^{2/}

In response to the Final Audit Report, the Committees provided additional documentation regarding the media vendor payments. Specifically, the Committees provided a copy of a refund check in the amount of \$65,000 to the California Committee, and records of expense reimbursements to Austin listed as media payments totaling \$47,703.22. The Committees subtracted those two amounts and the \$60,000 New Jersey state account overpayment from the Commission's \$3,029,502.48 total to arrive at \$2,856,799.26 in total payments to Austin. The Committees' response also listed additional invoices totaling \$46,766.46 and another media bill in the amount of \$22,000, reaching an invoiced total of \$2,852,789.60. Thus, the Committees calculated an apparent overpayment of only \$4,009.66 (\$2,856,799.26 minus \$2,852,789.60), less \$753.50 in media expenses paid by Austin, but never billed to the campaign, for a total unreconciled amount of \$3,256.16. See Attachment 5 at 3.

The Commission agrees that the Committees were not overbilled by the media vendor. The Committees have satisfied 11 C.F.R. § 9033.11(b)(1)(iv)(A) by providing evidence that the remaining amount, which constitutes about

^{2/} The Interim Audit Report questioned whether the \$60,000 refund constituted a prohibited contribution from the vendor. Attachment 1 at 6. The Committees' response to the Interim Audit Report demonstrated that the vendor was merely refunding excess money paid by the Committees. Attachment 2 at 4-5.

.1% of their total media payments, is part of an identifiable program otherwise sufficiently documented. Id. Therefore, the Commission has determined that no repayment is required relative to the media disbursements at issue.

b. Presidential Committee

The Commission made an initial determination that the Presidential Committee failed to adequately document \$513,328.69 in disbursements, including payments to individuals, vendors, and checks made payable to "Cash."

In response to the Final Audit Report, the Presidential Committee provided explanatory purposes, Internal Revenue Service 1099 Forms,^{3/} signed statements and receipts from cash recipients and copies of money orders which support cash disbursements totaling \$3,490. In addition, the Presidential Committee provided copies of debit memos and wire transfers to support seven other disbursements totaling \$268,925. The Presidential Committee showed that another \$10,000 disbursement had been erroneously disclosed. See Attachment 5 at 2.

The Presidential Committee also provided a voided check to support an undocumented disbursement of \$10,175.92 to the Chicago Hilton and Towers in response to the Final Audit Report. However, the invoice from the Chicago Hilton showed the following annotation: "\$11,000 deposit." Attachment 5

^{3/} These forms disclose miscellaneous income and show the Jesse Jackson for President '88 Committee as the payer and the individual as the payee who received the undocumented disbursement as nonemployee compensation.

at 2. The invoice also showed \$9,820.80 in charges. Neither the deposit nor the amount of the invoice could be reconciled with Committee records. < On April 14, 1993, the Committees submitted documentation to the Commission showing that the Committees issued an \$11,000 cashier's check to the Chicago Hilton & Towers on March 10, 1988.^{4/} Therefore, the Commission considers this \$11,000 disbursement to be a qualified campaign expense. >

Revised

In relation to its state accounts, the Presidential Committee responded to the Final Audit Report by providing schedules of payments to personnel, Internal Revenue Service 1099 Forms, signed affidavits from payees, established per diem policies or fully descriptive purposes to support \$3,466 in 1987 disbursements and \$14,472.56 in 1988 disbursements. For two disbursements totaling \$1,750, the Committees submitted unlabeled schedules of payments to payees that did not include purposes or were incomplete as to payee information; since this documentation was inadequate, no adjustments have been made.

In addition, the Presidential Committee attempted to document seven disbursements totaling \$1,895 made in proximity to the Democratic National Convention by providing canceled checks and a list of Jackson delegates which included the names of the payees. The Presidential Committee also submitted a statement that it was unable to locate other receipts. Finding

^{4/} In a letter accompanying the documentation, the Committees' counsel stated that the Committees believed that this evidence had been forwarded to the Commission shortly after November 14, 1992.

revi !

this documentation inadequate because the delegate list does not directly substantiate qualified expenditures, the Commission has made no revisions to the initial repayment determination based on such delegate information. See Attachment 5 at 3. However, in the case of disbursements to delegates from Oregon, the Presidential Committee submitted copies of travel vouchers detailing the campaign's per diem and advance policy, most of which were signed by the payees, for \$2,638 in disbursements. See 11 C.F.R. § 9033.11(b)(1)(iv)(B). Such additional support for convention expenditures is sufficient to show the payments were for qualified campaign expenses.

Based upon the Committees' post-oral presentation submission, the Commission has accepted as adequate documentation from the Presidential Committee a copy of a canceled check in the amount of \$162.50, showing the back of the check endorsed by a newspaper, though the check was made out to "Cash." The Commission also has reduced the amount of nonqualified expenses by \$300 for a disbursement listed on two different schedules. Moreover, the Commission has reduced the initial repayment determination to account for the redeposit of \$16,646.54 to a Committee account and a canceled check in the amount of \$33,525.96 to Progressive Direct Mail; both amounts were documented by the Committees following the oral presentation.

The Commission also has accepted collateral evidence of another rent check to the same landlord as sufficient to document a \$300 check to Bennet Block. Other adjustments

reflect two signed statements from payees for disbursements totaling \$720 and evidence of an airplane ticket and payment to an answering service for another \$700 in disbursements to individuals. However, no adjustments have been made for 11 disbursements related to 1987 activity and 106 disbursements related to 1988 activity addressed by the Committees, some of which were part of their GOTV program. For these 106 items, the Committees submitted duplicates of the Committee-generated documents originally submitted in response to the Final Audit Report.

In sum, the Presidential Committee has reduced the amount of nonqualified campaign expenses by $\langle \$362,884.48 \rangle$ by submitting *revised* various payee-generated and other documentation following the Final Audit Report and oral presentation. Therefore, the Commission has made a final determination that the Presidential Committee must repay $\langle \$46,646.13 \rangle \langle \$150,444.21 \rangle \times .310056$, *revised* representing the pro rata portion of $\langle \$150,444.21 \rangle$ in inadequately *revised* documented disbursements.

c. California Committee

The Commission made an initial determination that the California Committee failed to adequately document \$119,108.13 in disbursements, including payments to individuals for advances and payments to a catering firm, a travel agency and a hotel.

For a \$14,000 disbursement to the Ambrosia Catering Company, the California Committee submitted a canceled check and a note that the vendor is no longer in business. The Committee also submitted an internally generated, contemporaneous

memorandum referring to the date of an event which corresponded to the date of the canceled check to caterers. The Commission finds this to be adequate documentation.

However, no adjustments have been made based on the California Committee's post-oral presentation submission regarding two disbursements to Prince Travel totaling \$16,090.94. Attachment 8 at 18. The Committees assert that the missing invoices were unobtainable because the travel agency had gone out of business. The Committees note that the auditors had accepted canceled checks and a Committee assertion that a catering firm had gone out of business as adequate documentation of a \$14,000 disbursement to Ambrosia Catering. The fact that a company is no longer in business does not excuse a committee from meeting its burden under 11 C.F.R. § 9033.11(a). The Commission does not consider the California Committee's assertion that the company was out of business as sufficient reason to avoid the requirement to document qualified campaign expenses. For the catering fee, the California Committee submitted an internally generated, contemporaneous memorandum referring to the date of an event which corresponded to the date of the canceled check to the caterers. This documentation gives some assurance that the \$14,000 disbursement was campaign-related. However, no such corroborating evidence is available for the travel agency payments. For example, the Committee did not submit any evidence of campaign-related activities corresponding to the travel payments or any other evidence to demonstrate that the payments to Prince Travel were

for specific campaign-related trips. Therefore, the Commission considers the disbursements to Prince Travel to be nonqualified campaign expenses.

For a \$20,003 disbursement to the Atlanta Hilton Hotel and Tower, the California Committee, in response to the Final Audit Report, submitted a check made out to the Bank of Los Angeles for a cashier's check annotated: "(Staff and Delegate Rooms) Atlanta Hilton Hotel and Towers." Such documentation did not comply with the requirements of 11 C.F.R. § 9033.11(b)(1) since there was no vendor statement, copy of the cashier's check, nor other evidence to show the payment was made and received for qualified campaign expenses. In its post-oral presentation response, however, the California Committee submitted a copy of a cashier's check to support the \$20,003 disbursement to the Atlanta Hilton. Attachment 8 at 3. The Commission has reduced the final repayment amount accordingly.

The Commission, however, did not make adjustments to the initial repayment determination based on the California Committee's submission of canceled checks and pages from a list of Jackson delegates, including the names, addresses and phone numbers of certain payees. The California Committee noted that the checks to delegates, totaling \$4,262, in almost all cases were dated just before or after the Democratic National

Convention.^{5/} The Commission did not consider this documentation, submitted in response to the Final Audit Report, as adequate to document the disbursements to individuals.

In sum, following the Final Audit Report and oral presentation, the California Committee provided adequate support for two vendor payments totaling \$34,003. Therefore, the Commission has made a final determination that the California Committee must repay \$26,387.36 ($\$85,105.13 \times .310056$), representing the pro rata portion of \$85,105.13 in inadequately documented disbursements.

d. New York Committee

The Commission made an initial determination that the New York Committee failed to adequately document \$74,315.95 in disbursements, including payments to individuals, many with GOTV purposes noted on the check vouchers; various vendor payments; and a \$10,000 payment to the candidate.

In response to the Final Audit Report, the New York Committee showed that a \$1,500 disbursement had been voided. In its post-oral presentation response, the New York Committee submitted a report from a certified public accounting firm showing the categorization of Committee expenditures by purpose. The Commission accepts this report as adequate documentation for the \$750 disbursement to that firm for accounting services, but not for the Committee expenditures referenced therein. The

^{5/} The dates of the checks ranged from July 12, 1988 to August 31, 1988.

Commission also finds \$3,500 in disbursements to the Rochester Convention Center to be qualified campaign expenses.

In addition to documentation the New York Committee submitted to show that certain disbursements were for qualified campaign expenses, it also submitted evidence that a nonqualified campaign expense in the amount of \$10,000 had been reimbursed. The Committee paid \$10,000 to the candidate on September 9, 1988, from an account at the Chase Lincoln First Bank of New York. The Final Audit Report explained that disbursement records for the Chase Lincoln account had not been available for the Audit staff during fieldwork, but that in response to the Interim Audit Report the Committee had provided a handwritten list of disbursements, including some purposes. Attachment 3 at 32. For the disbursement to the Reverend Jackson, the Committee had listed the purpose as a "transfer of proceeds," but the Commission could not trace the transfer to another Committee account. Id. at 51. The check was endorsed by "Jesse L. Jackson" and deposited at the Drexel National Bank in Chicago. For lack of adequate documentation, the Commission made an initial determination that this disbursement was a nonqualified campaign expense. In response to the Final Audit Report, the Committees provided a copy of a reimbursement check dated February 24, 1989, in the amount of \$10,000, drawn at the Drexel National Bank in Chicago, and remitted on March 21, 1989, by Jacqueline Jackson, the candidate's wife. However, the Committees did not explain the purpose of the original disbursement. Attachment 5 at 4.

Generally, payments to a presidential candidate by his or her authorized committee are not qualified campaign expenses, unless the payments are to reimburse funds advanced by the candidate for qualified campaign expenses. 11 C.F.R. § 9034.4(b)(5). Moreover, the \$10,000 payment to the Reverend Jackson was made after his July 20, 1988, date of ineligibility. Therefore, the expenditure would have had to constitute a winding down cost to have been considered a qualified campaign expense. 11 C.F.R. § 9034.4(a)(3). It appears that the Committees realized the disbursement to the candidate was a nonqualified campaign expense and received a reimbursement of the funds prior to Commission consideration of the Interim Audit Report. The Commission finds that the \$10,000 is no longer a nonqualified campaign expense because the relatively timely reimbursement restored the funds to the Committees' account.

In sum, following the Final Audit Report and oral presentation, the New York Committee reduced the amount of inadequately documented disbursements by \$15,750, including \$1,500 for a voided check, \$750 for campaign-related accounting services, \$3,500 in payments to a convention center, and a \$10,000 reimbursement. Therefore, the Commission has made a final determination that the New York Committee must repay \$18,158.72 ($\$58,565.95 \times .310056$), representing the pro rata portion of \$58,565.95 in inadequately documented expenses.

III. STALE-DATED COMMITTEE CHECKS

The Commission's regulations specify that a committee shall submit a check to the United States Treasury for the total

amount of outstanding checks that have not been cashed. 11 C.F.R. § 9038.6. The Explanation and Justification for this provision states that for a committee to use these funds to pay other obligations would result in prohibited or excessive contributions from the original payee. 52 Fed. Reg. 20874 (June 3, 1987).

In the Final Audit Report, the Commission made an initial determination that \$5,114.48, representing the amount of eight stale-dated checks, should be repaid to the Treasury. Attachment 3 at 32-33. In their response to the Final Audit Report, the Committees submitted evidence to show that a disbursement check in the amount of \$1,925 to the Gotham Brokerage Co. was cashed by the payee.

In the Committees' oral presentation and subsequent submission, counsel argues in general that 11 C.F.R. § 9038.6 is overly broad because the payees on the Committees' stale-dated checks did not intend to make excessive or prohibited contributions by failing to cash the checks. More specifically, counsel asserts that a \$1,500 check issued to the New York Committee should be excluded from the amount subject to repayment. Counsel reasons that the Commission's justification for the stale-dated check rule, namely that vendors' failure to redeem committees' payments could result in illegal contributions, does not apply to checks issued to affiliated political committees. See Attachment 6 at 22; Attachment 7 at 4.

Section 9038.6 reflects the Commission's concern about the disposition of checks written to creditors or contributors, potentially resulting in a prohibited or excessive contribution. However, the Committees are correct in pointing out that such concern is not valid in the case of a check issued to an affiliated committee, which is neither a creditor nor a contributor. Consequently, the repayment amount is reduced by the amount of the stale-dated check issued to the affiliated committee. Therefore, the Commission has made a final determination that the Committees must repay \$1,689.48 to the United States Treasury, representing the sum of six checks issued by the Jackson campaign, but never cashed by the payees.

IV. MATCHABILITY OF EXCESSIVE CONTRIBUTIONS

Under 26 U.S.C. § 9038(b)(1), a candidate shall repay to the United States Treasury an amount equal to the payments received from the matching payment account in excess of the aggregate amount to which the candidate was entitled under 26 U.S.C. § 9034. Examples of such excess payments include payments made on the basis of matched contributions later determined to have been non-matchable. 11 C.F.R.

§ 9038.2(b)(1)(iii). Contributions are non-matchable if made or accepted in violation of 2 U.S.C. § 441a. 11 C.F.R.

§ 9034.3(e); see Simon for President Statement of Reasons, approved March 4, 1993 (Committee must repay \$1,673 representing excessive portion of contributions submitted for matching).

The Presidential Committee received \$9,524.08 in matching funds for portions of 79 contributions, which proved to be

excessive when aggregated with other contributions from the same donors. The Presidential Committee refunded 17 of the 79 excessive contributions which were submitted for matching. The California Committee received \$672.41 in matching payments for excessive contributions which were later refunded. Therefore, the Commission made an initial determination that the Committees must repay \$10,196.49 in matching funds received in excess of their entitlement.

The Committees assert that the Commission's approach is "overly rigid" and inconsistent with its more flexible reattribution and redesignation procedures at 11 C.F.R. §§ 110.1(b), (k). Attachment 7 at 5. The Committees note: "Where the problem presented is one of paperwork, the Commission permits timely amendments to that paperwork to cure the problem." Id. Further, the Committees reject the counter-argument that a more stringent standard should be applied to the matching of public funds than the receipt of excessive contributions. Id. The Committees contend that "nothing in the Commission regulations prohibit reattribution . . . of an apparently but 'technically' excessive contribution so that matchability may be restored." Id. Notably, during the oral presentation, counsel advanced the concept of fungible monies, stating: "[W]e'd like to suggest there ought to be a way to rescue these matchable contributions because there are lawful matchable funds from the same contributors within the pool of money that we received." Attachment 6 at 24. Thus, while the check submitted for matching represented the excessive portion

of the contribution, the Committees argue that the federal funds should be considered as matching a portion of the earlier contribution that was within the limits. The Committees take the position that the Commission would deny matchability of the \$250 excess contribution, as well as "any portion of the earlier contribution which was well within the lawful limits."

Attachment 7 at 4.

The Committees' counsel overstates the case. The Committees did not submit any portion of the earlier contribution to be matched, and there is no guarantee that the earlier portion was matchable pursuant to 11 C.F.R. § 9034.2. Their argument that contributions should be considered fungible overlooks the fact that under existing regulations, the Commission can only match specific written instruments submitted by eligible committees. See 11 C.F.R. § 9034.2. For example, section 9034.2(c) requires that the written instrument contain the amount and date of the contribution. Therefore, the Commission will not sua sponte match a contribution by the same individual made on a different date in a different amount. Indeed, Committees' counsel concedes that the Commission may not be able to adopt the Committees' position on the matchability issue without engaging in a separate rulemaking procedure.

Attachment 7 at 5.

Moreover, the Committees' analogy to the regulations on redesignation and reattribution is inapposite. As the Committees' response acknowledges, those regulations deal with private contributions accepted in excess of the limitations,

rather than public matching funds. If a committee has received contributions which exceed the limitations of 2 U.S.C. § 441a, either on their face or in the aggregate, those contributions are non-matchable under 11 C.F.R. § 9034.3(e). If a contribution in the form of a single written instrument exceeds \$1,000, ~~the excessive portion~~ can be matched only if the ~~committee~~ *revised* receives a reattribution of the excessive portion within 60 days. See Guideline for Presentation in Good Order (December 1986), at VI-6. Thus, the Commission allows presidential committees to use what the Committees' counsel terms the "flexible mechanism" of 11 C.F.R. § 110.1(k) within the context of the matching fund program. ~~Finally, this~~ *deleted* "flexible mechanism" still requires that the specific instrument be matched.

Therefore, the Commission has made a final determination that the Committees must repay to the United States Treasury \$10,196.49 in matching funds received in excess of entitlement.

V. FINAL REPAYMENT DETERMINATION

For the foregoing reasons, the Commission has made a final determination that pursuant to 26 U.S.C. § 9038(b)(2) and 11 C.F.R. § 9038.2(c)(4), the Reverend Jesse L. Jackson, the Jesse Jackson for President '88 Committee, Jackson for President '88 -- California, and New Yorkers for Jesse Jackson are ordered to repay to the United States Treasury ~~(\$122,030.91.)~~ *revised* As previously noted, the Committees have tendered a repayment to the United

States Treasury for \$75,000. Thus, the Committees are ordered to repay an additional ~~(\$47,030.91)~~ ~~(\$122,030.91)~~ \$75,000) to the revised United States Treasury representing the net repayment amount.

Attachments

1. Interim Audit Report and letter dated May 17, 1991 (portions expunged).
2. Committees' Response to Interim Audit Report dated September 17, 1991 (portions expunged, attachments omitted).
3. Final Audit Report and letter dated April 22, 1992.
4. Committees' Response to Final Audit Report dated June 30, 1992 (attachments omitted).
5. Audit Division Comments on Committees' Response to Final Audit Report, dated August 4, 1992.
6. Transcript of Oral Presentation on October 28, 1992.
7. Committees' Response following their Oral Presentation, dated November 12, 1992.
8. Audit Division Comments on Committees' Response following their Oral Presentation, dated January 26, 1993.
9. Memorandum to the Commission recommending acceptance of Committees' check in advance of final repayment determination, dated January 26, 1993.
10. Audit Division Comments on Revised Repayment Determination, dated April 15, 1993.

Added

03 1 1993

RECEIVED HR-73-20

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 15, 1993

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

THROUGH: JOHN C. SURINA
STAFF DIRECTOR

FROM: ROBERT J. COSTA
ASSISTANT STAFF DIRECTOR
AUDIT DIVISION

SUBJECT: REVISION TO FINAL REPAYMENT AMOUNT -
JESSE JACKSON FOR PRESIDENT '88 COMMITTEE
JESSE JACKSON FOR PRESIDENT '88 COMMITTEE-CALIFORNIA
AND NEW YORKERS FOR JESSE JACKSON

Based upon the Commission's decision with respect to the Chicago Hilton and Towers during the April 15, 1993 Open Session, the revision to the amount repayable with respect to Apparent Non-Qualified Campaign Expenses - Undocumented Expenditures for the Jesse Jackson for President '88 Committee is as follows:

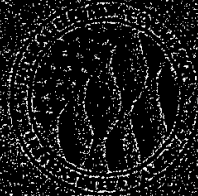
Amount inadequately documented disbursements per 4/06/93 Memo and Draft Statement of Reasons	\$161,444.21
Less: Chicago Hilton and Towers	<u>(11,000.00)</u>
Amount inadequately documented Final Statement of Reasons April 15, 1993	\$150,444.21
Multiplied by Repayment Ratio	<u>.310056</u>
Repayment Amount	\$ 46,646.13

Memorandum to Lawrence M. Noble
Page 2

For your convenience, presented below is a recap of the amounts subject to the repayment provision of 26 U.S.C. §9038(b) or 11 C.F.R. §9038.6.

FAR Finding V.B.	Apparent Non-Qualified Campaign Expenses - Penalties and Apparent Non-Campaign Related Travel	\$ 18,952.73
FAR Finding V.C.	Apparent Non-Qualified Campaign Expenses - Undocumented Expenditures (JJFP '88)	46,646.13
FAR Finding V.D.	Apparent Non-Qualified Campaign Expenses - Unreconciled Payments to Media Vendor	-0-
FAR Finding V.E.	Excessive Portions of Contributions and Refunded Contributions Submitted for Matching	9,524.08
FAR Finding VI.A.	Apparent Non-Qualified Campaign Expenses - Undocumented Disbursements (JJFP-CA)	26,387.36
FAR Finding VI.B.	Matching Funds Received in Excess of Entitlement - Refunded Contributions Submitted for Matching (JJFP-CA)	672.41
FAR Finding VII.A.	Apparent Non-Qualified Campaign Expenses (NYJJ)	18,158.72
FAR Finding VII.B.	Stale Dated Committee Checks (NYJJ)	<u>1,689.48</u>
	TOTAL	<u>\$122,030.91</u>

Should you have any questions, please contact Cornelia Riley or Rick Halter at 219-3720.



FEDERAL ELECTION COMMISSION

333 B STREET, N.W.

WASHINGTON, D.C. 20543

Public Disclosure
(Cooper)



FEDERAL ELECTION COMMISSION

DATE & TIME TRANSMITTED: WEDNESDAY, SEPTEMBER 01, 1993 4:00

BALLOT DEADLINE: TUESDAY SEPTEMBER 07, 1993 4:00

COMMISSIONER: AIKENS, ELLIOTT, McDONALD, McGARRY, POTTEP, THOMAS

SUBJECT: JESSE JACKSON FOR PRESIDENT '88 COMMITTEE,
JACKSON FOR PRESIDENT '88--CALIFORNIA. AND
NEW YORKERS FOR JESSE JACKSON -- REQUEST
FOR EXTENSION TO MAKE REPAYMENT (LRA #365).
MEMORANDUM TO THE COMMISSION FROM THE
OFFICE OF THE GENERAL COUNSEL DATED
SEPTEMBER 1, 1993.

050012017

I approve the recommendation(s)

I object to the recommendation(s)

COMMENTS: _____

DATE: _____ SIGNATURE: _____

A definite vote is required. All ballots must be signed and dated.
Please return ONLY THE BALLOT to the Commission Secretary.
Please return ballot no later than date and time shown above.

FROM THE OFFICE OF THE SECRETARY OF THE COMMISSION



September 1, 1993

MEMORANDUM

TO: The Commission *S*

THROUGH: John C. Suriba
Staff Director

FROM: Lawrence M. Noble
General Counsel *L.M.N.*

Kim Bright-Coleman *KBC*
Associate General Counsel

Lorenzo Holloway
Acting Assistant General Counsel *L.H.*

Gregory R. Baker *GRB*
Attorney

SUBJECT: Jesse Jackson for President '88 Committee, Jackson for President '88--California, and New Yorkers for Jesse Jackson -- Request for Extension to Make Repayment (LRA #365)

Attached for your review is a request by the Reverend Jesse L. Jackson, the Jesse Jackson for President '88 Committee, Jackson for President '88 -- California, and New Yorkers for Jesse Jackson ("the Committees") for a second extension of time to make a repayment. On April 15, 1993, the Commission made a final determination that the Committees must repay \$47,030.91 to the United States Treasury, representing the difference between the total repayment of \$122,030.91 and an earlier repayment of \$75,000, made on January 11, 1993. On April 23, 1993, the Commission notified the Committees of the final repayment determination, pursuant to 26 U.S.C. § 9038(b). The Committees were required to make a repayment to the United States Treasury on May 27, 1993. 11 C.F.R. § 9038.2(d)(2).

On May 27, 1993, the Committees submitted a repayment check in the amount of \$17,030.91 and requested an extension of 90 days to raise the additional \$30,000 owed to the United States Treasury or to "raise whatever funds are available for repayment and identify to the Commission a payment schedule during which repayment of the balance will be possible." Attachment 1. The Committees also asserted that they have been actively engaged in fundraising, but that their efforts "have not been easy or

entirely successful." Id. Further, the Committees stated that they expect to raise the full amount, but are not certain of how long it will take. Id. On June 17, 1993, the Commission approved the Committees' request for a 90 day extension. Thus, the full amount of the repayment was due on August 25, 1993. However, the Commission directed the Committees to establish a repayment schedule prior to August 25, 1993 if it appeared that sufficient funds could not be raised.

On August 25, 1993, the Committees submitted a repayment check in the amount of \$15,000 and requested an additional 90 days to raise the remaining \$15,000. The Committees state that it has been "using best efforts to raise sufficient monies to fulfill its remaining repayment obligation." Attachment 2. In addition, the Committees maintain that "with additional fundraising plans in effect, [it] expects to be able to raise the remaining obligation . . . by November 24, 1993." Id.

The Office of General Counsel recommends that the Commission grant the Committees' request for a 90 day extension to pay the remaining amounts due. We recognize that the Commission does not routinely grant extensions of time.^{1/} 11 C.F.R. § 9038.4(a). However, given the Committees' limited financial resources, the fact that they made a substantial payment in advance of the Commission's final determination, and their continuing good faith effort to raise the additional funds, this Office believes that good cause exists to approve the Committees' request in this instance.^{2/} 11 C.F.R. § 9038.4(b). We note that the Committees have already paid \$107,030.91 of the \$122,030.91 repayment amount.

It was anticipated that the Committees might not raise sufficient funds to pay the entire amount due on August 25, 1993. As a result, the Commission directed the Committees to establish a repayment schedule in the event that such scenario arose. Under the circumstances, it does not appear necessary to establish a further repayment schedule at this time. We believe that the Committees' August 25, 1993 letter provides sufficient assurances that the remaining \$15,000 will

^{1/} If a presidential committee fails to make its repayment, the Commission may institute judicial action to seek recovery of the amount owed to the United States Treasury. 26 U.S.C. § 9040 b. However, upon application by the candidate, the Commission may grant an extension of up to 90 days in which to make repayment. 11 C.F.R. § 9038.2(d)(2).

^{2/} The Committees' 1993 July Quarterly Report shows \$24,137.22 cash-on-hand as of June 30, 1993. Attachment 3. The report also discloses outstanding debts owed by the Committees totaling \$121,802.97.

Memorandum to the Commission
Request for Extension to Make Repayment
Jesse Jackson for President '88 Committee
Page 3

be repaid by November 24, 1993. The notification letter, however, will inform the Committees that no further extensions will be granted.

Therefore, this Office recommends that the Commission grant the Committees an extension of 90 days to make their remaining repayment. Accordingly, the Committees would be required to repay \$15,000 by November 24, 1993.

RECOMMENDATIONS

The Office of General Counsel recommends that the Commission:

1. Grant Reverend Jesse L. Jackson, Jesse Jackson for President '88 Committee, Jackson for President '88 -- California, and New Yorkers for Jesse Jackson an extension of 90 days, until November 24, 1993, to make their remaining repayment of \$15,000 to the United States Treasury; and
2. Approve the appropriate letter notifying the Committee of the Commission's decision.

Attachments

1. Letter from Committees' counsel, Re: Jesse Jackson for President '88 Committee Repayment, dated May 27, 1993.
2. Letter from Committees' counsel, Re: Jesse Jackson for President '88 Committee Repayment, dated August 25, 1993.
3. Committee's 1993 July Quarterly Report.

PATTON, BOGGS & BLOW

2550 M STREET, N W

WASHINGTON, D.C. 20037

(202) 457-6000

TELETYPE 97761
TELESCOPE 457 635

WRITER'S DIRECTORIAL

(202) 457-6094

May 27, 1993

Federal Election Commission
999 E Street, N.W.
Washington, DC 20463

Re: Jesse Jackson For President '88 Committee
Repayment

Dear Commissioners:

The Jesse Jackson For President '88 Committee (the "Committee") does not dispute the Commission's determination that the total amount the Committee is required to repay the Treasury is one hundred twenty-two thousand thirty dollars and ninety-one cents (\$122,030.91). As acknowledged in the Commission's final repayment determination, the Committee has prepaid to the Treasury seventy-five thousand dollars (\$75,000) and herewith encloses an additional payment in the amount of seventeen thousand thirty dollars and ninety-one cents (\$17,030.91). With the enclosed payment, the Committee's outstanding repayment obligation stands at thirty thousand dollars (\$30,000).

At the present time, the Committee does not have sufficient cash-on-hand to make the final repayment within the 30 days initially allotted for such repayment. While the Committee has been actively engaged in fundraising to repay the Treasury, these fundraising efforts have not been easy or entirely successful.

Accordingly, the Committee hereby requests an extension of time of ninety (90) days under the provisions of 11 C.F.R. § 9038.2(d)(2) during which it will attempt to accomplish one of the following:

1. raise the funds necessary to make repayment; or
2. raise whatever funds are available for repayment and identify to the Commission a payment schedule during which repayment of the balance will be possible.

The Committee anticipates that it will be in the position at some point to raise all the monies necessary to fulfill its repayment obligation to the Treasury. The date by which this will be possible is still unknown.

ATTACHMENT 1

Page 1 of 2

PATTON, BOGGS & BLOW

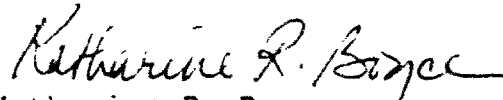
FEC

May 27, 1993

Page 2

The Committee would appreciate approval of its request for an extension of ninety (90) days within which to raise the additional monies for repayment and also, if necessary, to establish a plan for raising whatever additional amounts will be needed.

Sincerely,



Katharine R. Boyce
Counsel to the Jesse Jackson For
President '88 Committee

KRB:jac
Enclosure

cc: Reverend Jesse Jackson

ATTACHMENT 1

Page 2 of 5

PATTON, BOGGS & BLOW

2550 M STREET, N.W.
WASHINGTON, D.C. 20037
202 457 6000

TELETYPE UNIT
202 457 6000

WRITERS DIRECTOR

(202) 457-6094

August 25, 1993

Federal Election Commission
999 E Street, N.W.
Washington, DC 20463

Re: Jesse Jackson for President '88 Committee
Repayment

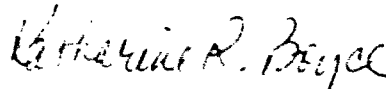
Dear Commissioners:

Enclosed please find a payment in the amount of fifteen thousand dollars (\$15,000.00) towards the Jesse Jackson for President '88 Committee's outstanding repayment obligation of thirty thousand dollars (\$30,000.00).

The Committee has been using best efforts to raise sufficient monies to fulfill its remaining repayment obligation. With additional fundraising plans in effect, the Committee expects to be able to raise the remaining obligation of fifteen thousand dollars (\$15,000.00) by November 24, 1993.

If you or your staff have any questions, please feel free to contact me at the above number.

Sincerely,



Katharine R. Boyce
Counsel to the Jesse Jackson
for President '88 Committee

KRB/jac
Enclosure

U.S. GOVERNMENT PRINTING OFFICE: 1975
WASHINGTON, D.C. 20460

**BY AN INDIVIDUAL REGISTERED AS A
CANDIDATE FOR THE OFFICE OF PRESIDENT**

SECRET
FMS
11-50-75

4510117

NOTE: This report is to be used by an authorized committee of a candidate seeking nomination or election to the Office of President or Vice President of the United States whether or not public funds are used.

USE THE FOLLOWING LINES TYPE OF REPORT	1. NAME OF COMMITTEE OR CLUB JESSE JACKSON FOR PRESIDENT '68 COMMITTEE		2. IDENTIFICATION NUMBER P4001018
	ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported 2550 M STREET, NW 7TH FLOOR		3. IS THIS REPORT OF RECEIPTS AND DISBURSEMENTS FOR: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General
	CITY STATE and ZIP CODE WASHINGTON, DC 20037		
4. TYPE OF REPORT (If appropriate, list and number if applicable)	<input type="checkbox"/> Amendment for Report	<input type="checkbox"/> Quarterly Report (annual)	5. FUNDING SOURCE (Type of funding source) <input type="checkbox"/> Through the Federal Government <input type="checkbox"/> Through the State Government <input type="checkbox"/> Through the Local Government <input type="checkbox"/> Through the Candidate's Personal Funds <input type="checkbox"/> Through the Candidate's Employer <input type="checkbox"/> Through the Candidate's Family <input type="checkbox"/> Through the Candidate's Friends <input type="checkbox"/> Through the Candidate's Organization <input type="checkbox"/> Through the Candidate's Business <input type="checkbox"/> Through the Candidate's Other Activities
	<input type="checkbox"/> April 15 Quarterly Report	<input type="checkbox"/> January 31 Year-End Report	
	<input checked="" type="checkbox"/> July 15 Quarterly Report	<input type="checkbox"/> Transmittal Report	
	<input type="checkbox"/> October 15 Quarterly Report		

7. TOTAL RECEIPTS THIS PERIOD (From Line 29 Credit A)	
8. CASH TOTAL (Add Line 6 and 7)	
9. TOTAL DISBURSEMENTS THIS PERIOD (From Line 29 Credit A)	
10. CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (From Line 8 and 9)	
11. DEBTS AND OBLIGATIONS PAID TO THE COMMITTEE (From Line 29 Credit A)	
12. DEBTS AND OBLIGATIONS PAID BY THE COMMITTEE (From Line 29 Credit A)	
13. NET ASSETS AT CLOSE OF PERIOD (From Line 10, 11, and 12)	
14. NET ASSETS AT BEGINNING OF PERIOD (From Line 13 of previous report)	
15. NET ASSETS AT END OF PERIOD (From Line 13 and 14)	

16. SIGNATURE OF CANDIDATE

17. SIGNATURE OF REPORTER

18. SIGNATURE OF ASSISTANT TREASURER

19. DATE

Maxwell Young *9/20/75*

NOTE: Schedule of total receipts or disbursement information only subject to review during the lifetime of the candidate of U.S.A. Party.
All printed matter of PSC Form 28 are optional and should be filled in when used.

**ALLOCATION OF PRIMARY EXPENDITURES BY STATE
 FOR A PRESIDENTIAL CANDIDATE**

(To Be Used Only in Primary Campaigns Receiving Federal Funds)

1 NAME OF COMMITTEE IN FULL JESSE JACKSON FOR PRESIDENT '88 COMMITTEE		2 IDENTIFICATION NUMBER P4001018	
COMMITTEE ADDRESS 2550 M STREET, NW 7TH FLOOR		3 NAME OF CANDIDATE JESSE L. JACKSON	
CITY, STATE AND ZIP CODE WASHINGTON, DC 20037			

ALLOCATION BY STATE

STATE	ALLOCATION THIS PERIOD	TOTAL ALLOCATION TO DATE	STATE	ALLOCATION THIS PERIOD	TOTAL ALLOCATION TO DATE
Alabama	0	2022.84	Nebraska	0	3092.32
Alaska	0	2522.00	Nevada	0	1723.86
Arizona	0	19215.00	New Hampshire	0	5221.85
Arkansas	0	10275.74	New Jersey	0	2022.84
California	0	142221.00	New Mexico	0	6027.00
Colorado	0	4222.13	New York	0	11222.34
Connecticut	0	2222.99	North Carolina	0	9222.84
Delaware	0	2222.00	North Dakota	0	0
District of Columbia	0	6222.47	Ohio	0	2222.84
Florida	0	12222.99	Oklahoma	0	2222.84
Georgia	0	9222.44	Oregon	0	12222.84
Hawaii	0	12222.12	Pennsylvania	0	11222.84
Idaho	0	1222.52	Rhode Island	0	2222.84
Illinois	0	32222.99	South Carolina	0	2222.84
Indiana	0	4222.48	South Dakota	0	2222.84
Iowa	0	157214.60	Tennessee	0	7222.47
Kansas	0	4222.33	Texas	0	20222.84
Kentucky	0	22222.99	Utah	0	7222.00
Louisiana	0	12222.00	Vermont	0	12222.84
Maine	0	12222.00	Virginia	0	12222.84
Maryland	0	6222.99	Washington	0	12222.84
Massachusetts	0	5222.99	West Virginia	0	22222.84
Michigan	0	142222.00	Wisconsin	0	9222.34
Minnesota	0	112222.30	Wyoming	0	6222.80
Mississippi	0	22222.30	Puerto Rico	0	0
Missouri	0	12222.12	Guam	0	0
Montana	0	21225.10	Virgin Islands	0	0
COLUMN TOTALS	0	2844925.39	COLUMN TOTALS	0	2672212.95

4. TOTAL ALLOCATED EXPENDITURES	0	5917138.34
5. TOTAL NON-ALLOCATED EXPENDITURES		12911709.55
6. TOTAL EXPENDITURES SUBJECT TO LIMITATION (Lines 4 & 5)		18428847.90

NAME OF COMMITTEE IN FULL
JESSE JACKSON FOR
PRESIDENT '88 COMMITTEE

REPORT PERIOD TO WHICH THIS REPORT RELATES
 From 01/01/88 to 12/31/88

	COLUMN A Total For Period	COLUMN B Change Year-to-Date
I. RECEIPTS		
16. FEDERAL FUNDS (Report on Schedule A-2)	0	0
17. CONTRIBUTIONS (other than loans) FROM:		
(a) Individuals/Persons Other Than Political Committees	25,125.00	25,125.00
(b) Political Party Committees	5,000.00	5,000.00
(c) Other Political Committees	200.00	200.00
(d) The Candidate	0	0
(e) TOTAL CONTRIBUTIONS (other than loans) (Add 17(a), 17(b), 17(c) and 17(d))	30,325.00	30,325.00
18. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES	0	0
19. LOANS RECEIVED:		
(a) Loans Received From or Guaranteed by Candidate	0	0
(b) Other Loans	0	0
(c) TOTAL LOANS RECEIVED (Add 19(a) and 19(b))	0	0
20. OTHER RECEIPTS (including interest, etc.):		
(a) TOTAL OTHER RECEIPTS TO EXPENDITURES (Add 20(a), 20(b) and 20(c))	0	0
21. TOTAL RECEIPTS (Add 16, 17(e), 18, 19(c), 20(a) and 21)	30,325.00	30,325.00
II. EXPENDITURES		
22. OPERATING EXPENDITURES		
23. TRANSFERS TO OTHER AUTHORIZED COMMITTEES		
24. PURCHASING EXPENDITURES		
25. EXPERT LEGAL AND ACCOUNTING EXPENDITURES		
26. LOAN REPAYMENTS MADE:		
(a) Repayment of Loans Made or Guaranteed by Candidate	0	0
(b) Other Repayments	0	0
(c) TOTAL LOAN REPAYMENTS MADE (Add 26(a) and 26(b))	0	0
27. REPURSE OF CONTRIBUTIONS TO:		
(a) Individuals/Persons Other Than Political Committees	0	0
(b) Political Party Committees	0	0
(c) Other Political Committees	0	0
(d) TOTAL CONTRIBUTION REPURSES (Add 27(a), 27(b) and 27(c))	0	0
28. OTHER EXPENDITURES		
29. TOTAL EXPENDITURES (Add 22, 23, 24, 25, 26, 27(d), 28(a) and 28)	0	0

16
17(a)
17(b)
17(c)
17(d)
17(e)

30
31

26
27

28
29

OPERATING EXPENDITURES SUBJECT TO LIMIT
 (To Be Used Only in Primary Campaign Funding Polling Period)

NAME OF CANDIDATE OR COMMITTEE (in Full)
JESSE JACKSON FOR PRESIDENT '88 COMMITTEE

A. Operating Expenditures (Line 23 Column B)	28624.41	
B. Operating Offsets (Line 23a Column B)	0	
C. Current Year Net Operating Expenditures (Subtract Line B from A)	28624.41	28624.41
D. Prior Year(s) Operating Expenditures		
E. Prior Year(s) Operating Offsets		
F. Prior Year(s) Net Operating Expenditures (Subtract Line E from D)	1462615.71	1462615.71
G. Fundraising Disbursements (Line 25 Column B)		
H. Offsets to Fundraising Disbursements (Line 25a Column B)		
I. Current Year Net Fundraising Disbursements (Subtract Line H from G)		
J. Prior Year(s) Fundraising Disbursements		
K. Prior Year(s) Fundraising Disbursements Offsets		
L. Prior Year(s) Net Fundraising Disbursements (Subtract Line K from J)		
M. Total Net Fundraising Disbursements (Add Line I and L)		
N. 50% Exemption (50% of Operating Expenditures Limit)		
O. Total Fundraising Disbursements Subject to Limit (Subtract Line M from N)		
P. Total Expenditures Subject to Limitation (Add Lines C, F and O)		19478847.90

INSTRUCTIONS

Obtain from PGC Form 29, page 29

2

3

PGC Form 29, page 4, is for use by a candidate or the principal authorized contributor of a candidate, in each operating expenditure report subject to limitation during the primary campaign (U.S.C. 4110b(b)(1)(A)). As soon as possible after the beginning of the calendar year, the Commission will publish the advertising limits to be used during the election year. The 50% fundraising exemption will be based on the published operating expenditure limitations.

4

Line A - From PGC Form 29, page 2, enter the calendar year to which you are reporting operating expenditures.
 Line B - Enter the calendar year-to-date total of offsets to operating expenditures.
 Line C - Subtract Line B from Line A.
 Line D - If reports were filed in a prior year(s), from the year-end report(s), enter the calendar year-to-date total for operating expenditures.

Line E - From the year-end report(s) for the prior year(s), enter the calendar year-to-date total for offsets to operating expenditures.
 Line F - Subtract Line E from Line D.
 Line G - From PGC Form 29, page 2, enter the calendar year-to-date total for fundraising disbursements.
 Line H - Enter the offset year-to-date total for offsets to fundraising disbursements.

Line I - From PGC Form 29, page 2, enter the calendar year-to-date total for fundraising disbursements.
 Line J - If reports were filed in a prior year(s), from the year-end report(s), enter the calendar year-to-date total for fundraising disbursements.
 Line K - If offsets to fundraising disbursements were reported in a prior year(s), from the year-end report(s), enter the calendar year-to-date total for offsets to fundraising disbursements.
 Line L - Subtract Line K from Line J.
 Line M - Add Line I and Line L.
 Line N - Enter 50% of the operating expenditures limit as published by the PGC.
 Line O - Subtract Line M from Line N. If the result is less than zero, enter -0-. If greater than zero, enter the amount.
 Line P - Add Line G, Line F, and Line O to obtain the total of operating expenditures subject to the Commission's offset to 5 U.S.C. 4110b(b)(1)(A) limitation.

Line Q - From PGC Form 29, page 2, enter the calendar year-to-date total for fundraising disbursements.
 Line R - Subtract Line M from Line Q.
 Line S - Add Line R, Line P, and Line O to obtain the total of operating expenditures subject to the Commission's offset to 5 U.S.C. 4110b(b)(1)(A) limitation.

Line T - From PGC Form 29, page 2, enter the calendar year-to-date total for fundraising disbursements.
 Line U - Subtract Line M from Line T.
 Line V - Add Line U, Line P, and Line O to obtain the total of operating expenditures subject to the Commission's offset to 5 U.S.C. 4110b(b)(1)(A) limitation.

Line W - From PGC Form 29, page 2, enter the calendar year-to-date total for fundraising disbursements.
 Line X - Subtract Line M from Line W.
 Line Y - Add Line X, Line P, and Line O to obtain the total of operating expenditures subject to the Commission's offset to 5 U.S.C. 4110b(b)(1)(A) limitation.

Line Z - From PGC Form 29, page 2, enter the calendar year-to-date total for fundraising disbursements.
 Line AA - Subtract Line M from Line Z.
 Line AB - Add Line AA, Line P, and Line O to obtain the total of operating expenditures subject to the Commission's offset to 5 U.S.C. 4110b(b)(1)(A) limitation.

Line AC - From PGC Form 29, page 2, enter the calendar year-to-date total for fundraising disbursements.
 Line AD - Subtract Line M from Line AC.
 Line AE - Add Line AD, Line P, and Line O to obtain the total of operating expenditures subject to the Commission's offset to 5 U.S.C. 4110b(b)(1)(A) limitation.

Line AF - From PGC Form 29, page 2, enter the calendar year-to-date total for fundraising disbursements.
 Line AG - Subtract Line M from Line AF.
 Line AH - Add Line AG, Line P, and Line O to obtain the total of operating expenditures subject to the Commission's offset to 5 U.S.C. 4110b(b)(1)(A) limitation.

SCHEDULE D-P

Federal Election Commission
 900 E Street, N.W.
 Washington, D.C. 20543

**DEBITS AND CREDITATIONS
 EXCLUDING LOANS**

Page **1** of **12**
 CONTINUED

NAME OF COMMITTEE In Full	DEBITED BALANCE	DATE AND AMOUNT	PAID BY	CREDITED BALANCE
JESSE JACKSON FOR PRESIDENT '88 COMMITTEE	THIS PERIOD	THIS PERIOD	THIS PERIOD	THIS PERIOD
A. Full Name, Mailing Address and Zip Code of Donor or Creditor Hatcher, Coaxum, Hewitt, Grimes, Manning 820 West Superior Avenue, #300 Cleveland, OH 44113	39992.28	0	0	39992.28 DISPUTED
Name of Debt Purpose: Legal fees				
B. Full Name, Mailing Address and Zip Code of Donor or Creditor Charrie Hervey 1169 Hovey Street Gary, IN 46406	2950.00	0	0	2950.00
Name of Debt Purpose: None				
C. Full Name, Mailing Address and Zip Code of Donor or Creditor Pico Books and Sells 6035 West Pico Boulevard Los Angeles, CA 90035	220.29	0	0	220.29
Name of Debt Purpose: Furniture and equipment rental				
D. Full Name, Mailing Address and Zip Code of Donor or Creditor Rensi, Pinti & Company 987 Haddon Avenue Collingswood, NJ 08108	69732.40	0	0	69732.40 DISPUTED
Name of Debt Purpose: Accounting				
E. Full Name, Mailing Address and Zip Code of Donor or Creditor Trains, Boats & Planes 155 North Harbor Drive Chicago, IL 60601	2068.00	0	0	2068.00
Name of Debt Purpose: TRANSPORTATION				
F. Full Name, Mailing Address and Zip Code of Donor or Creditor Washington, Pittman & McKeever 819 South Wabash, #600 Chicago, IL 60605	6840.00	0	0	6840.00
Name of Debt Purpose: ACCOUNTING				
1) SUBTOTAL This Period This Page (Include)				121002.97
2) TOTAL This Period (See page 001 and 002)				121002.97

046
 8
 4
 3
 3
 2

JESSE JACKSON FOR PRESIDENT '88 COMMITTEE

SUMMARY PAGE FOR LINE 17a

ITEMIZED RECEIPTS	\$25,000.00
UNITEMIZED RECEIPTS	\$ 125.00

TOTAL LINE 17a	\$25,125.00

15050/0190009
381347

()

SCHEDULE A-P

Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

ITEMIZED RECEIPTS

Use separate statements for each category of the General Summary and	Page 1	of Statements 4
	LINE NUMBER 17a	

NAME OF COMMITTEE (in Full)
JESSE JACKSON FOR PRESIDENT '88 COMMITTEE

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

NAME, ADDRESS, CITY, STATE, ZIP CODE	NAME OF EMPLOYER	OCCUPATION	RECEIPT FOR (check one)	DATE (MONTH, DAY, YEAR)	AMOUNT OF EACH RECEIPT THIS PERIOD
THOMAS J. ADAMS, III 2009 OLIVER STREET HYATTSVILLE, MD 20782	THOMPSON, CURTIS	ACCOUNTANT	<input checked="" type="checkbox"/> Primary <input type="checkbox"/> General	05/10	500.00
KENNETH S. BIANCHI 14 DAWN VIEW COURT SILVER SPRING, MD 20904	THOMPSON, CURTIS	ACCOUNTANT	<input type="checkbox"/> Primary <input type="checkbox"/> General	05/10	1,000.00
ROSCOE C. BROWN, JR. 4555 HENRY HUDSON PARKWAY RIVERDALE, NY 10471	BROOK COLLEGE	PROFESSOR	<input type="checkbox"/> Primary <input type="checkbox"/> General	05/10	300.00
RAOUL L. CARROLL 7821 MORNINGSIDE DRIVE, NW WASHINGTON, DC 20012	M.R. BEAL	INVESTMENT BANKER	<input checked="" type="checkbox"/> Primary <input type="checkbox"/> General	05/10	1,000.00
NICHAKL J. COBB 1500 CRITTENDEN STREET, NW WASHINGTON, DC 20011	THOMPSON, CURTIS	ACCOUNTANT	<input checked="" type="checkbox"/> Primary <input type="checkbox"/> General	05/10	1,000.00
MARY COLLIER 469 FERN STREET WEST HARTFORD, CT 06107			<input type="checkbox"/> Primary <input type="checkbox"/> General	05/10 05/10	500.00 500.00
RODNEY L. DORAN 20 WALTS HILL ROAD BLOOMFIELD, CT 06002			<input type="checkbox"/> Primary <input type="checkbox"/> General	05/10	1,000.00
KENNETH DREW 102-30 66TH ROAD FOREST HILLS, NY 11375			<input checked="" type="checkbox"/> Primary <input type="checkbox"/> General	05/10 05/10	450.00 450.00

SUBTOTAL OF RECEIPTS THIS PAGE (optional)

TOTAL THIS PERIOD (SEE END OF THIS NUMBER ONLY)

ATTACHMENT Page **7** of

SCHEDULE A-P

Federal Election Commission
 600 E Street, N.W.
 Washington, D.C. 20463

ITEMIZED RECEIPTS

Use separate schedules for each category of the General Summary page

PAGE **2**
 OF THIS PAGE **4**
 LINE NUMBER

17a

NAME OF COMMITTEE In Full
JESSE JACKSON FOR PRESIDENT '88 COMMITTEE

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

DATE
 MONTH,
 DAY,
 YEAR)

AMOUNT OF
 EACH RECEIPT
 THIS PERIOD

NAME, ADDRESS, CITY, STATE, ZIP CODE	NAME OF EMPLOYER	OCCUPATION	RECEIPT FOR	DATE	AMOUNT
SANDRA B. DURANT 1560 BROADWAY NEW YORK, NY 10036	DURANT & ISAACS	ATTORNEY	<input checked="" type="checkbox"/> Primary <input type="checkbox"/> General	05/10	500.00
DARRELL S. GAY 111 BROADWAY NEW YORK, NY 10006	SELF-EMPLOYED	ATTORNEY	<input type="checkbox"/> Primary <input type="checkbox"/> General	05/10	1,000.00
MARCIA A. GILLESPIE 15 WEST 72ND STREET NEW YORK, NY 10023	MS. MAGAZINE	EDITOR IN CHIEF	<input checked="" type="checkbox"/> Primary <input type="checkbox"/> General	05/10	700.00
TANYA CURTIS HALEY 14032 GULLIVERS TRAIL BOWIE, MD 20720	THOMPSON, CURTIS	ACCOUNTANT	<input checked="" type="checkbox"/> Primary <input type="checkbox"/> General	05/10	1,000.00
REGINALD HENRY 1010 VERMONT AVENUE, NW WASHINGTON, DC 20005	THOMPSON, CURTIS	ACCOUNTANT	<input checked="" type="checkbox"/> Primary <input type="checkbox"/> General	05/10	500.00
WALTER JEFFERSON 1000 6TH STREET, SW WASHINGTON, DC 20024	THOMPSON, CURTIS	ACCOUNTANT	<input checked="" type="checkbox"/> Primary <input type="checkbox"/> General	05/10	500.00
AURELIUS H. PIPER, JR.				05/10	1,000.00

23038481049

SUBTOTAL OF RECEIPTS THIS PAGE (optional)

Page 3 of

SCHEDULE A-P

Federal Election Commission
900 E Street, N.W.
Washington, D.C. 20463

ITEMIZED RECEIPTS

LINE NUMBER	3	PAGE	4
LINE NUMBER	17a		

NAME OF COMMITTEE (in Full)
JESSE JACKSON FOR PRESIDENT '88 COMMITTEE

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

NAME, ADDRESS, CITY, STATE, ZIP CODE	NAME OF EMPLOYER	OCCUPATION	RECEIPT FOR	DATE (MONTH, DAY, YEAR)	AMOUNT OF EACH RECEIPT THIS PERIOD
BEATRICE P. SULLIVAN 5 GORHAM AVENUE BLOOMFIELD, CT 06002			<input checked="" type="checkbox"/> Primary <input type="checkbox"/> General	05/10	1,000.00
CAROLLE M. THIESFIELD 504 FIRETOWN ROAD SIMSBURY, CT 06070			<input checked="" type="checkbox"/> Primary <input type="checkbox"/> General	05/10	1,000.00
LISA THIESFIELD 504 FIRETOWN ROAD SIMSBURY, CT 06070			<input checked="" type="checkbox"/> Primary <input type="checkbox"/> General	05/10	1,000.00
JEFFREY THOMPSON 322 PEABODY STREET, NW WASHINGTON, DC 20011	THOMPSON, CURTIS	ACCOUNTANT	<input checked="" type="checkbox"/> Primary <input type="checkbox"/> General	05/10	1,000.00
MYRTLE THOMPSON 322 PEABODY STREET, NW WASHINGTON, DC 20011			<input checked="" type="checkbox"/> Primary <input type="checkbox"/> General	05/10	1,000.00
ROBERT A. WEAVER-BEY 343 GARDEN STREET HARTFORD, CT 06112	SELF-EMPLOYED	BUSINESSMAN	<input checked="" type="checkbox"/> Primary <input type="checkbox"/> General	05/10	1,000.00
MICHELLE MORRIS WESTON 145 WEST 67TH STREET NEW YORK, NY 10023	SMITH BARNEY	VICE PRESIDENT	<input checked="" type="checkbox"/> Primary <input type="checkbox"/> General	05/10	500.00
FRANCES V. WHITE 4 FOREST COURT BRIDGEPORT, CT 06604			<input checked="" type="checkbox"/> Primary <input type="checkbox"/> General	05/10	1,000.00

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38481050
3303
2303

SUBTOTAL OF RECEIPTS THIS PAGE (optional)

TOTAL THIS PERIOD (see page 4 for line number entry)

SCHEDULE A-P

Federal Election Commission
 925 E Street, N.W.
 Washington, D.C. 20003

ITEMIZED RECEIPTS

Use separate schedules for each category of the detailed summary list

PAGE 4
 LINE NUMBER

OF THIS REPORT 4
 17a

NAME OF COMMITTEE (in Full)
JESSE JACKSON FOR PRESIDENT '88 COMMITTEE

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

DATE (MONTH, DAY, YEAR)

AMOUNT OF EACH RECEIPT THIS PERIOD

NAME, ADDRESS, CITY, STATE, ZIP CODE
FRANK WILLIAMS, JR.
 300 YOAKUM PARKWAY
 ALEXANDRIA, VA 22304

NAME OF EMPLOYER
THOMPSON, CURTIS
 OCCUPATION
ACCOUNTANT
 AGGREGATE YEAR-TO-DATE
1,000.00

RECEIPT FOR (check one)
 Primary
 General

05/10

1,000.00

NAME, ADDRESS, CITY, STATE, ZIP CODE
MALLALIEU S. WOOLPOLK
 84 SCHOONMAKER ROAD
 TEANECK, NJ 07666

NAME OF EMPLOYER
 OCCUPATION
 AGGREGATE YEAR-TO-DATE
900.00

RECEIPT FOR (check one)
 Primary
 General

05/10
 05/10

450.00
 450.00

NAME, ADDRESS, CITY, STATE, ZIP CODE
LAMOND GODWIN
 355 SOUTH END AVENUE
 NEW YORK, NY 10280

NAME OF EMPLOYER
SHEARSON ASSET
 OCCUPATION
VICE-PRESIDENT
 AGGREGATE YEAR-TO-DATE
1,000.00

RECEIPT FOR (check one)
 Primary
 General
 FINE & PENALTIES

05/10

1,000.00

NAME, ADDRESS, CITY, STATE, ZIP CODE
WILLIAM HUGHES HAYDEN
 30 FIFTH AVENUE
 NEW YORK, NY 10011

NAME OF EMPLOYER
BEAR STEARNS
 OCCUPATION INVEST-
MENT BANKER
 AGGREGATE YEAR-TO-DATE
1,000.00

RECEIPT FOR (check one)
 Primary
 General
 FINE & PENALTIES

05/10

1,000.00

NAME, ADDRESS, CITY, STATE, ZIP CODE
CLIFTON SUTTON
 40 WEST 135TH STREET
 NEW YORK, NY 10037

NAME OF EMPLOYER
 OCCUPATION
 AGGREGATE YEAR-TO-DATE
350.00

RECEIPT FOR (check one)
 Primary
 General
 FINE & PENALTIES

05/10

350.00

NAME, ADDRESS, CITY, STATE, ZIP CODE
OLIVER C. SUTTON, JR.

NAME OF EMPLOYER
 OCCUPATION
 AGGREGATE YEAR-TO-DATE
350.00

RECEIPT FOR (check one)
 Primary
 General
 FINE & PENALTIES

05/10

350.00

NAME, ADDRESS, CITY, STATE, ZIP CODE
PIERRE M. SUTTON
 125 BURDT MEADOW ROAD
 RINGWOOD, NJ 07456

NAME OF EMPLOYER
H.A.B.O.B.
 OCCUPATION
EXEC. DIRECTOR
 AGGREGATE YEAR-TO-DATE

RECEIPT FOR (check one)
 Primary
 General
 FINE & PENALTIES

05/10

1,000.00

NAME, ADDRESS, CITY, STATE, ZIP CODE
 NAME OF EMPLOYER
 OCCUPATION
 AGGREGATE YEAR-TO-DATE

RECEIPT FOR (check one)
 Primary
 General

SUBTOTAL OF RECEIPTS THIS PAGE (optional).....

TOTAL THIS PERIOD (SEE PAGE 516 LINE NUMBER ONLY).....

Page 4 of 12
85,000.00

51
 48
 43
 38
 33
 28
 23
 18
 13
 8
 3

SCHEDULE A-P

Federal Election Commission
399 E Street, N.W.
Washington, D.C. 20463

ITEMIZED RECEIPTS

USE spaces indicated for each category of the General Summary Sheet	PAGE 1	OF THIS FORM 1
	LINE NUMBER	17b

NAME OF COMMITTEE (in Full)
JESSE JACKSON FOR PRESIDENT '88 COMMITTEE

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

NAME, ADDRESS, CITY, STATE, ZIP CODE	NAME OF EMPLOYER	OCCUPATION	RECEIPT FOR (Primary/General)	DATE (MONTH, DAY, YEAR)	AMOUNT OF EACH RECEIPT THIS PERIOD
DNC Services Corporation 430 South Capitol Street Washington, DC 20003			<input checked="" type="checkbox"/> Primary <input type="checkbox"/> General	06/16/93	5,000.00
			<input type="checkbox"/> Primary <input type="checkbox"/> General		
			<input type="checkbox"/> Primary <input type="checkbox"/> General		
			<input type="checkbox"/> Primary <input type="checkbox"/> General		
			<input type="checkbox"/> Primary <input type="checkbox"/> General		
			<input type="checkbox"/> Primary <input type="checkbox"/> General		
			<input type="checkbox"/> Primary <input type="checkbox"/> General		
			<input type="checkbox"/> Primary <input type="checkbox"/> General		
			<input type="checkbox"/> Primary <input type="checkbox"/> General		
			<input type="checkbox"/> Primary <input type="checkbox"/> General		

25038481052

SUBTOTAL OF RECEIPTS THIS PAGE (optional)

TOTAL THIS PERIOD (see page 1 for line number entry)

SCHEDULE A-P

Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

ITEMIZED RECEIPTS

Use spaces provided for each category of the attached summary page	PAGE 1	OF THIS FORM 1
LINE NUMBER 17c		

NAME OF COMMITTEE (in Full)
JESSE JACKSON FOR PRESIDENT '88 COMMITTEE

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

DATE
(MONTH,
DAY,
YEAR)

AMOUNT OF
EACH RECEIPT
THIS PERIOD

NAME, ADDRESS, CITY, STATE, ZIP CODE

Committee to Elect Salima
S. Marriott
P.O. Box 67398
Baltimore, MD 21215

NAME OF EMPLOYER

OCCUPATION

AGGREGATE YEAR-TO-DATE

200.00

RECEIPT FOR

(specify other)

Primary

General

05/10/93

200.00

NAME, ADDRESS, CITY, STATE, ZIP CODE

NAME OF EMPLOYER

OCCUPATION

AGGREGATE YEAR-TO-DATE

RECEIPT FOR

(specify other)

Primary

General

NAME, ADDRESS, CITY, STATE, ZIP CODE

NAME OF EMPLOYER

OCCUPATION

AGGREGATE YEAR-TO-DATE

RECEIPT FOR

(specify other)

Primary

General

NAME, ADDRESS, CITY, STATE, ZIP CODE

NAME OF EMPLOYER

OCCUPATION

AGGREGATE YEAR-TO-DATE

RECEIPT FOR

(specify other)

Primary

General

NAME, ADDRESS, CITY, STATE, ZIP CODE

NAME OF EMPLOYER

OCCUPATION

AGGREGATE YEAR-TO-DATE

RECEIPT FOR

(specify other)

Primary

General

NAME, ADDRESS, CITY, STATE, ZIP CODE

NAME OF EMPLOYER

OCCUPATION

AGGREGATE YEAR-TO-DATE

RECEIPT FOR

(specify other)

Primary

General

NAME, ADDRESS, CITY, STATE, ZIP CODE

NAME OF EMPLOYER

OCCUPATION

AGGREGATE YEAR-TO-DATE

RECEIPT FOR

(specify other)

Primary

General

NAME, ADDRESS, CITY, STATE, ZIP CODE

NAME OF EMPLOYER

OCCUPATION

AGGREGATE YEAR-TO-DATE

RECEIPT FOR

(specify other)

Primary

General

ATTACHMENT

3

SUBTOTAL OF RECEIPTS THIS PAGE (optional)

TOTAL THIS PERIOD (for use on the number only)

250384810513

SCHEDULE A-P

Federal Election Commission
700 E Street, N.W.
Washington, D.C. 20463

ITEMIZED RECEIPTS

Use spaces available for each category of the grouped summary page	PAGE 1	OF THIS PAGE 1
LINE NUMBER		21

NAME OF COMMITTEE (in Full) **JESSE JACKSON FOR PRESIDENT '88 COMMITTEE**

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

NAME, ADDRESS, CITY, STATE, ZIP CODE RIGGS NATIONAL BANK 2550 M STREET, NW WASHINGTON, DC 20037	NAME OF EMPLOYER INTEREST INCOME	DATE (MONTH, DAY, YEAR)	AMOUNT OF EACH RECEIPT THIS PERIOD
	OCCUPATION	04/30	18.18
	AGGREGATE YEAR-TO-DATE	05/31	23.16
	RECEIPT FOR (check one) <input type="checkbox"/> Primary <input type="checkbox"/> General	06/30	24.53

NAME, ADDRESS, CITY, STATE, ZIP CODE	NAME OF EMPLOYER	DATE (MONTH, DAY, YEAR)	AMOUNT OF EACH RECEIPT THIS PERIOD
	OCCUPATION		
	AGGREGATE YEAR-TO-DATE		
	RECEIPT FOR (check one) <input type="checkbox"/> Primary <input type="checkbox"/> General		

NAME, ADDRESS, CITY, STATE, ZIP CODE	NAME OF EMPLOYER	DATE (MONTH, DAY, YEAR)	AMOUNT OF EACH RECEIPT THIS PERIOD
	OCCUPATION		
	AGGREGATE YEAR-TO-DATE		
	RECEIPT FOR (check one) <input type="checkbox"/> Primary <input type="checkbox"/> General		

NAME, ADDRESS, CITY, STATE, ZIP CODE	NAME OF EMPLOYER	DATE (MONTH, DAY, YEAR)	AMOUNT OF EACH RECEIPT THIS PERIOD
	OCCUPATION		
	AGGREGATE YEAR-TO-DATE		
	RECEIPT FOR (check one) <input type="checkbox"/> Primary <input type="checkbox"/> General		

NAME, ADDRESS, CITY, STATE, ZIP CODE	NAME OF EMPLOYER	DATE (MONTH, DAY, YEAR)	AMOUNT OF EACH RECEIPT THIS PERIOD
	OCCUPATION		
	AGGREGATE YEAR-TO-DATE		
	RECEIPT FOR (check one) <input type="checkbox"/> Primary <input type="checkbox"/> General		

NAME, ADDRESS, CITY, STATE, ZIP CODE	NAME OF EMPLOYER	DATE (MONTH, DAY, YEAR)	AMOUNT OF EACH RECEIPT THIS PERIOD
	OCCUPATION		
	AGGREGATE YEAR-TO-DATE		
	RECEIPT FOR (check one) <input type="checkbox"/> Primary <input type="checkbox"/> General		

NAME, ADDRESS, CITY, STATE, ZIP CODE	NAME OF EMPLOYER	DATE (MONTH, DAY, YEAR)	AMOUNT OF EACH RECEIPT THIS PERIOD
	OCCUPATION		
	AGGREGATE YEAR-TO-DATE		
	RECEIPT FOR (check one) <input type="checkbox"/> Primary <input type="checkbox"/> General		

NAME, ADDRESS, CITY, STATE, ZIP CODE	NAME OF EMPLOYER	DATE (MONTH, DAY, YEAR)	AMOUNT OF EACH RECEIPT THIS PERIOD
	OCCUPATION		
	AGGREGATE YEAR-TO-DATE		
	RECEIPT FOR (check one) <input type="checkbox"/> Primary <input type="checkbox"/> General		

SUBTOTAL OF RECEIPTS THIS PAGE (optional)

TOTAL THIS PERIOD (last page this line number only)

23030481454

SCHEDULE B-P

Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

ITEMIZED DISBURSEMENTS

Use spaces provided for each category of the checked summary page	LINE NUMBER	23
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NAME OF COMMITTEE IN FULL: **JESSE JACKSON FOR PRESIDENT '88 COMMITTEE**

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DATE
MONTH,
DAY,
YEAR

AMOUNT
OF EACH
DISBURSEMENT
THIS PERIOD

NAME, ADDRESS, CITY, STATE, ZIP CODE CT CORPORATION SYSTEM P.O. BOX 1421 NEW YORK, NY 10116	PURPOSE OF DISBURSEMENT CORPORATE AGENCY FEE	06/16	215.00
DISBURSEMENT FOR: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)			

NAME, ADDRESS, CITY, STATE, ZIP CODE DELAWARE SECRETARY OF STATE P.O. BOX 7247-0113 PHILADELPHIA, PA 19170	PURPOSE OF DISBURSEMENT CORPORATE TAXES	06/16	71.50
DISBURSEMENT FOR: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)			

NAME, ADDRESS, CITY, STATE, ZIP CODE SUSANNE HAESSLER 4101 CATHEDRAL AVENUE, NW WASHINGTON, DC 20016	PURPOSE OF DISBURSEMENT ACCOUNTING	04/27 05/10 06/08	1,533.00 1,102.50 787.50
DISBURSEMENT FOR: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)			

NAME, ADDRESS, CITY, STATE, ZIP CODE MAILBOX 1377 K STREET, NW WASHINGTON, DC 20005	PURPOSE OF DISBURSEMENT P.O. BOX RENTAL	05/10	60.00
DISBURSEMENT FOR: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)			

NAME, ADDRESS, CITY, STATE, ZIP CODE MANSIONS CATERING 45 DOWNING STREET NEW YORK, NY 10014	PURPOSE OF DISBURSEMENT CATERING	05/10	2,500.00
DISBURSEMENT FOR: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)			

NAME, ADDRESS, CITY, STATE, ZIP CODE PATTON, BOGGS & BLOW 2550 M STREET, NW WASHINGTON, DC 20037	PURPOSE OF DISBURSEMENT TELEPHONE, XEROXING	05/10	1,500.00
DISBURSEMENT FOR: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)			

NAME, ADDRESS, CITY, STATE, ZIP CODE PERKINS, COLE 607 14TH STREET, NW WASHINGTON, DC 20005	PURPOSE OF DISBURSEMENT LEGAL FEES	05/17	424.50
DISBURSEMENT FOR: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)			

NAME, ADDRESS, CITY, STATE, ZIP CODE RIGGS NATIONAL BANK 2550 M STREET, NW WASHINGTON, DC 20037	PURPOSE OF DISBURSEMENT BANK CHARGES	06/08	13.00
DISBURSEMENT FOR: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)			

SUBTOTAL OF DISBURSEMENTS THIS PAGE (optional) 19

TOTAL THIS PERIOD (last page this line number only)

ITEMIZED DISBURSEMENTS

Use column
 indicated to
 each category
 of the attached
 summary page

Page	2	of 2 pages	3
Line Number	23		

NAME OF COMMITTEE OR FUND: **JESSE JACKSON FOR PRESIDENT '88 COMMITTEE**

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DATE
 MONTH,
 DAY,
 YEAR)

AMOUNT
 OF EACH
 DISBURSEMENT
 THIS PERIOD

NAME, ADDRESS, CITY, STATE, ZIP CODE	PURPOSE OF DISBURSEMENT	DATE MONTH, DAY, YEAR)	AMOUNT OF EACH DISBURSEMENT THIS PERIOD
U.S. TREASURY	REPAYMENT OBLIGATION	05/24	17,030.91
	DISBURSEMENT FOR: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		

SUBTOTAL OF DISBURSEMENTS THIS PAGE (optional).....

TOTAL THIS PERIOD (last page this line number only).....

15
23,030.91

10-10-81
 481038

**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.

Hand Delivered

DATE OF RECEIPT

7/15/93

First Class Mail

POSTMARKED

Registered/Certified Mail

POSTMARKED

No Postmark

Postmark Illegible

Received from the House Office of Records and Registration

DATE OF RECEIPT

Received from the Senate Office of Public Records

DATE OF RECEIPT

Other (Specify):

POSTMARKED

DATE OF RECEIPT

J.A.D.
PREPARED

7/15/93
DATE RECEIVED

93038481057

3
46

Public Records
(Cooper)



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

SEP 10 1993 2:25

September 10, 1993

MEMORANDUM

TO: THE COMMISSIONERS

THROUGH: JOHN C. SURINA
STAFF DIRECTOR

FROM: ROBERT J. COSTA
ASSISTANT STAFF DIRECTOR
AUDIT DIVISION

SUBJECT: REPAYMENT OF \$15,000 RECEIVED FROM JESSE JACKSON FOR
PRESIDENT '88 COMMITTEE

This informational memorandum is to advise you of a \$15,000 repayment check received from Jesse Jackson for President '88 Committee (the Committee). The check represents one half of the Committee's final repayment amount of \$30,000 which was due on August 25, 1993. The Committee's request for an extension of time to make the remaining repayment has been addressed in a separate memorandum from the Office of General Counsel.

Attached is a copy of the check and the receipt showing delivery to the Department of the Treasury.

If you have any questions concerning this matter, please contact Ray Lisi at 219-3720.

PATTON, BOGGS & BLOW

2550 M STREET, N.W.
WASHINGTON, D.C. 20037
(202) 457-6000

FAX TELE. 97780
TELECOPIER 457-615

WRITER'S DIRECT DIAL

(202) 457-6094

August 25, 1993

Federal Election Commission
999 E Street, N.W.
Washington, DC 20463

Re: Jesse Jackson for President '88 Committee
Repayment

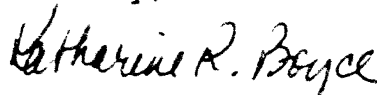
Dear Commissioners:

Enclosed please find a payment in the amount of fifteen thousand dollars (\$15,000.00) towards the Jesse Jackson for President '88 Committee's outstanding repayment obligation of thirty thousand dollars (\$30,000.00).

The Committee has been using best efforts to raise sufficient monies to fulfill its remaining repayment obligation. With additional fundraising plans in effect, the Committee expects to be able to raise the remaining obligation of fifteen thousand dollars (\$15,000.00) by November 24, 1993.

If you or your staff have any questions, please feel free to contact me at the above number.

Sincerely,



Katharine R. Boyce
Counsel to the Jesse Jackson
for President '88 Committee

KRB/jac
Enclosure

JESSE JACKSON FOR PRESIDENT
'88 COMMITTEE

1094

August 25 19 93 ¹⁵⁻¹/₃₄₀28

PAY
TO THE
ORDER OF

U.S. Treasury

\$ 15,000.00

Fifteen thousand and 00/100

DOLLARS

 **RIGGS**
The First National Bank of Washington, D.C.
Member FDIC
Washington, D.C. 20001

[Signature]
Katharine R. Riggs

FOR

⑈001094⑈ ⑆054000030⑆ 17098331⑈



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

RECEIPT FROM THE
UNITED STATES DEPARTMENT OF TREASURY
FOR A REPAYMENT OF
1988 PRESIDENTIAL PRIMARY MATCHING FUNDS

September 3, 1993

Received on September 3, 1993, from the Federal Election Commission (by hand delivery), a check (#1094) drawn on the Riggs National Bank of Washington, D. C., in the amount of \$15,000. The check represents a partial repayment from the Jesse Jackson for President '88 Committee as requested in the final repayment determination in the revised statement of reasons.

Pursuant to 26 U. S. C. §9038(d), this check should be deposited into the Matching Payment Account.

Jesse Jackson for President '88 Committee
Amount of Repayment: \$15,000

Presented by:

Arthur S. Stagg
for the
Federal Election Commission

Received by:

Raymond B. Quinn
For the
United States Treasury

0570121013



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

Public Records
RECEIVED
FEC.
AKOD 7/52
SECRETARIAT
93 DEC -6 PM 3:27

December 6, 1993

MEMORANDUM

TO: THE COMMISSIONERS

THROUGH: JOHN C. SUBINA
STAFF DIRECTOR

FROM: ROBERT J. COSTA
ASSISTANT STAFF DIRECTOR
AUDIT DIVISION

SUBJECT: REPAYMENT OF \$10,000 RECEIVED FROM THE JESSE
JACKSON FOR PRESIDENT '88 COMMITTEE

This informational memorandum is to advise you of two repayment checks totalling \$10,000 received from the Jesse Jackson for President '88 Committee (the Committee). These checks represent the balance of the Committee's repayment obligation as requested in the final repayment determination in the revised statement of reasons.

Copies of the checks, the Committee's letters which accompanied the checks, and the receipt showing delivery to the Department of the Treasury are attached.

If you have any questions regarding this matter, please contact Ray Lisi at 219-3720.

93 12 01 9 10 14

JESSE JACKSON FOR PRESIDENT
'88 COMMITTEE

1099

November 29 19 93 ¹⁵⁻³/₅₄₀₂₈

PAY TO THE ORDER OF U.S. Treasury

Five thousand and 00/100

\$ 5,000.00

DOLLARS



Suzanne Haastler
Katharine R. Boyce

FOR
⑈001099⑈ - ⑈054000030⑈

⑈709833⑈

JESSE JACKSON FOR PRESIDENT
'88 COMMITTEE

1100

December 2 19 93 ¹⁵⁻³/₅₄₀₂₈

PAY TO THE ORDER OF U.S. Treasury

Five thousand and 00/100

\$ 5,000.00

DOLLARS



Suzanne Haastler
Katharine R. Boyce

FOR
⑈001100⑈ - ⑈054000030⑈

⑈709833⑈

PATTON, BOGGS & BLOW

2550 M STREET, N.W.
WASHINGTON, D.C. 20037
(202) 457-6000

TELETYPE 97780
TELESCOPE 457 635

WRITER'S DIRECT DIAL
(202) 457-6084

December 2, 1993

Mr. Greg Baker, Esq.
Office of General Counsel
Federal Election Commission
999 E Street, N.W., 4th Floor
Washington, D.C. 20463

Re: Repayment by Jesse Jackson for President '88
Committee

Dear Mr. Baker:

As promised, I am enclosing a check in the amount of five-thousand dollars (\$5,000.00) as a final installment towards the above referenced Presidential Committee's repayment obligation to the U.S. Treasury.

If you have any questions, please do not hesitate to give me a call at the above number. Thank you for your kind attention to this matter.

Sincerely,



Katharine R. Boyce
Counsel to Jesse Jackson for
President '88 Committee

KRB ald

Enclosure

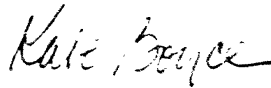
Mr. Greg Baker, Esq.

Page 2

November 29, 1993

If you have any questions, please do not hesitate to give me a call at the above number. Thank you for your kind attention to this matter.

Sincerely,



Katharine R. Boyce
Counsel to Jesse Jackson for
President '88 Committee

KRB/ald

Enclosure

105-10121-1017

PATTON, BOGGS & BLOW

2550 M STREET, N W
WASHINGTON, D C 20037
(202) 457 6000

FAX TELE 97780
TELECOPIER 457635

WRITER'S DIRECT DIAL
(202) 457-6094

November 29, 1988

Mr. Greg Baker, Esq.
Office of General Counsel
Federal Election Commission
999 E Street, N.W., 4th Floor
Washington, D.C. 20463

93 NOV 30 PM 2:01

RECEIVED
FEDERAL ELECTION COMMISSION

Re: Repayment by Jesse Jackson for President '88
Committee

Dear Mr. Baker:

As promised, I am enclosing a check in the amount of five-thousand dollars (\$5,000.00) as a further installment towards the above referenced Presidential Committee's repayment obligation to the U.S. Treasury. We had expected to be able to transmit this additional five-thousand dollars (\$5,000.00) on the due date of November 24, but we had to return the initial underlying check written on a state account. This morning we received a five-thousand dollar (\$5,000.00) check written on the correct federal account and therefore are remitting the enclosed payment.

As to the outstanding balance due of five thousand dollars (\$5,000.00), the Committee expected to receive a check by express mail today that would have enabled the Committee to fulfill its entire remaining repayment obligation. The Committee is trying to trace the express delivery of said check, but could not trace its whereabouts by the time I needed to transmit this letter to you by messenger. As soon as I have more specific information as to a date certain when the Committee can make its final payment, I will call you. I expect to receive such details within the next day or two.



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RECEIPT FROM THE
UNITED STATES DEPARTMENT OF TREASURY
FOR A REPAYMENT OF
1988 PRESIDENTIAL PRIMARY MATCHING FUNDS

December 6, 1993

Received on December 6, 1993, from the Federal Election Commission (by hand delivery), two checks (#1099 & #1100) drawn on the Riggs National Bank of Washington, D. C., totalling \$10,000. The checks represent the final repayment from the Jesse Jackson for President '88 Committee as requested in the final repayment determination in the revised statement of reasons.

Pursuant to 26 U. S. C. §9038(d), these checks should be deposited into the Matching Payment Account.

Jesse Jackson for President '88 Committee
Amount of Repayment: \$10,000

Presented by:

Received by:

Garry J. Nyquist
for the
Federal Election Commission

Robert C. Messner
for the
United States Treasury

Public Receipts

RECEIVED
F.E.C.
SECRETARIAT
4410



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

93 NOV 30 PM 2:31

November 30, 1993

MEMORANDUM

TO: THE COMMISSIONERS

THROUGH: JOHN C. SURINA
STAFF DIRECTOR

FROM: ROBERT J. COSTA *RJC by RJZ*
ASSISTANT STAFF DIRECTOR
AUDIT DIVISION

SUBJECT: REPAYMENT OF \$5,000 RECEIVED FROM THE JESSE JACKSON FOR PRESIDENT '88 COMMITTEE

This informational memorandum is to advise you of a repayment check in the amount of \$5,000 received from the Jesse Jackson for President '88 Committee (the Committee). With this payment the Committee has repaid \$112,030.91 of the \$122,030.91 final repayment determination leaving a balance of \$10,000 outstanding.

Copies of the check, the Committee's letter which accompanied the check, and the receipt showing delivery to the Department of the Treasury are attached.

If you have any questions regarding this matter, please contact Ray Lisi at 219-3720.

Attachments as stated

100-101000-1000

JESSE JACKSON FOR PRESIDENT
'88 COMMITTEE

1098

November 24 19 93

15-1
546 28

PAY
TO THE
ORDER OF

U.S. Treasury

\$ 5,000.00

Five thousand and 00/100

DOLLARS



Suzanne Vaasler
Katharine R. Boyce

FOR

⑈001098⑈ ⑆054000030⑆

⑆709833⑆⑈

Kee d'Arden
11-24-93 Ph

PATTON, BOGGS & BLOW
2550 M STREET, N.W.
WASHINGTON, D C 20037
(202) 457 6000

FAX TELE 97780
TELEPHONE 457 635

WRITER'S DIRECT DIAL
(202) 457-6094

November 24, 1993

Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20436

Re: Jesse Jackson for President '88 Committee
Repayment

Dear Commissioners:

Enclosed please find a payment in the amount of five thousand dollars (\$5,000.00) towards the Jesse Jackson for President '88 Committee's outstanding repayment obligation of fifteen thousand dollars (\$15,000.00).

The Committee has been using its best efforts to raise sufficient monies to fulfill its remaining repayment obligation. With additional fundraising plans in effect, the Committee has been able to raise the enclosed sum and expects to be able to forward the balance due shortly.

If you or your staff have any questions, please feel free to contact me at the above number.

Sincerely,
Katharine R. Boyce
Katharine R. Boyce

KRB/ald
Enclosure



FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

RECEIPT FROM THE
UNITED STATES DEPARTMENT OF TREASURY
FOR A REPAYMENT OF
1988 PRESIDENTIAL PRIMARY MATCHING FUNDS

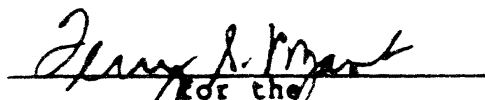
November 29, 1993

Received on November 29, 1993, from the Federal Election Commission (by hand delivery), a check (#1098) drawn on the Riggs National Bank of Washington, D. C., in the amount of \$5,000. The check represents a partial repayment from the Jesse Jackson for President '88 Committee as requested in the final repayment determination in the revised statement of reasons.


Pursuant to 26 U. S. C. §9038(d), this check should be deposited into the Matching Payment Account.

Jesse Jackson for President '88 Committee
Amount of Repayment: \$5,000

Presented by:


for the
Federal Election Commission

Received by:


for the
United States Treasury