

RECORD

December 1987

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REGULATIONS

REVISED DELEGATE REGULATIONS PRESCRIBED

On November 20, 1987, the Commission prescribed revised regulations, at 11 CFR 110.14, setting forth the Act's prohibitions, limitations and reporting requirements as they apply to the process of selecting delegates to the Presidential nominating conventions. (For a summary of the revised rules, see pages 1-4 of the November 1987 Record.)

These regulations, along with an explanation and justification, were published in the September 22, 1987, issue of the Federal Register. 52 Fed. Reg. 35530. Copies of the new regulations and the explanation and justification may be obtained by calling 376-3120 or toll-free 800/424-9530.

FREEDOM OF INFORMATION ACT AND ACCESS TO PUBLIC RECORDS: EFFECTIVE DATE FOR RULES

The FEC's new rules governing the Freedom of Information Act (FOIA) and access to Public Disclosure Division documents became effective on November 20, 1987, thirty days after their publication in the Federal Register on October 21. (See 52 Fed. Reg. 39210.) These final rules contain revised language concerning the billing of special mail services. Otherwise, they are identical to interim rules which became effective on June 24, 1987. (See 52 Fed. Reg. 23636)

For more detailed summaries of these rules, see page 4 of the November 1987 Record (final rules) and page 5 of the August 1987 Record (interim rules).

REPORTS

JANUARY REPORTING SCHEDULE

All registered political committees must file a year-end report, due January 31, 1988. The chart below indicates the coverage and filing dates for the different types of committees. See page 2 for information on where to file reports.

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JANUARY REPORTING SCHEDULE

Type of Filer	Coverage Period	Filing Date
Newly Registered Committees*	Beginning of Federal Election Activity through December 31	January 31
Authorized Congressional Committees	July 1** through December 31	January 31
Authorized Presidential Committees/Quarterly	October 1 through December 31	January 31
Authorized Presidential Committees/Monthly***	December 1 through December 31	January 31
Unauthorized Committees	July 1** through December 31	January 31
Unauthorized Committees/Monthly***	December 1 through December 31	January 31

*This category applies to any committee which is filing its first report.

**Or from the closing date of the last report filed.

***The year-end report is filed in lieu of a monthly report, otherwise due on January 20, 1988.

CHANGE IN FILING FREQUENCY

PACs and party committees which plan to change their reporting schedule in 1988 (e.g., from semiannually to monthly) must notify the Commission by submitting a letter with the January report. A committee may not change its filing frequency more than once a year. 11 CFR 104.5(c). The FEC requests that Presidential committees also inform the Commission in writing if they decide to change their reporting schedules.

WHERE REPORTS ARE FILED

Committees must file all reports and statements simultaneously with the appropriate federal and state officials. 11 CFR 108.5.

Filing with the Federal Government

- o The principal campaign committees of House candidates and committees supporting or opposing only House candidates file with the Clerk of the House, Office of Records and Registration, 1036 Longworth House Office Building, Washington, D.C. 20515. 11 CFR 104.4(c)(3) and 105.1.
- o The principal campaign committees of Senate candidates and committees supporting or opposing only Senate candidates file with the Secretary of the Senate, Senate Public Records, Hart Senate Office Building, Room 232, Washington, D.C. 20510. 11 CFR 104.4(c)(2) and 105.2.
- o All other committees, including the principal campaign committees of Presidential candidates, file with the Federal Election Commission, 999 E Street, N.W., Washington, D.C. 20463. 11 CFR 105.3 and 105.4

Filing with State Governments

- o The principal campaign committees of Congressional candidates seeking nomination must file a copy of every report and statement with the Secretary of State or the appropriate elections official of the state in which the candidate seeks federal office. 11 CFR 108.3
- o The principal campaign committees of Presidential candidates must file copies of reports and statements with the Secretary of State or the appropriate elections official of the state in which the committee makes campaign expenditures. These reports must contain all financial transactions which apply to that state during the reporting period covered. 11 CFR 108.2.

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- o PACs and party committees making contributions or expenditures in connection with House and Senate races file reports and statements in the state in which the candidate seeks election. The law requires a copy of only that portion of the report applicable to the candidate(s) campaigning in that state. Committees supporting Presidential candidates must file in the state(s) in which the Presidential committee and donor committee have their respective headquarters.

U.S.C. §431(a)(B)(iii); 11 CFR 100.8(b)(4) and 104.6(a).

The \$2,000 threshold for reporting applies **separately** to each election process within a calendar year (i.e., all primary elections, the general election and any special or runoff elections). 11 CFR 100.8(b)(4)(v) and 104.6(a)(1) and (2). Each corporation, each incorporated subsidiary and each state and local chapter of a labor organization has a separate \$2,000 threshold. Therefore, each entity need not report until the threshold is reached. 11 CFR 100.8(b)(4)(i) and (vi).

Note that this reporting requirement is not applicable to "political committees" as defined by 2 U.S.C. §431(4).

800 LINE

REPORTING INTERNAL COMMUNICATIONS BY CORPORATE, LABOR AND MEMBERSHIP ORGANIZATIONS

Under the Federal Election Campaign Act (the Act) and Commission Regulations, corporations* and labor organizations are permitted to communicate with their respective "restricted classes" on any subject. 2 U.S.C. §441b(b)(2)(A); 11 CFR 114.3(a). However, the Act requires that costs incurred for communications which expressly advocate the election or defeat of one or more clearly identified candidates be reported by the corporation or labor organization if the costs exceed \$2,000 for any election. Communications primarily devoted to subjects other than **express advocacy** of the election or defeat of a clearly identified candidate are not reportable. 2

**The rules governing corporate activity apply to a broad range of incorporated organizations: national banks, corporations with capital stock and incorporated membership organizations (including corporations without capital stock, incorporated trade associations and incorporated cooperatives).*

***For purposes of these partisan communications, the restricted class of a corporation includes its stockholders, executive and administrative personnel and their families. A labor organization's restricted class includes its members, executive and administrative personnel and their families. In the case of incorporated membership organizations, trade associations, cooperatives, and corporations without capital stock, the restricted class includes their noncorporate members, executive and administrative personnel and their families. (A trade association may also direct partisan communications to individual representatives of member corporations with whom the association normally conducts its activities.)*

What Form to Use

Corporations and labor organizations required to file a report under these provisions should use either FEC Form 7 or a letter containing the same information. 11 CFR 104.6(a).

What Must be Reported

Each report filed under these provisions must include the following for each communication:

1. The type of communication (e.g., direct mail, telephone or telegram).
2. The class or category communicated with (e.g., members, stockholders or executive/administrative personnel).
3. The date(s) of the communication.
4. Whether the communication is in support of, or in opposition to, the candidate.
5. The name of the candidate, the office sought, the district and state of the office and whether the communication was for the primary or the general election.
6. The cost of the communication. 11 CFR 104.6(c).

NOTE: In the case of a communication which advocates the election or defeat of more than one candidate, the cost should be allocated among the candidates according to the benefit they are expected to derive and should be reported accordingly.

When to Report

Organizations required to report under these provisions must file **quarterly reports** during a calendar year in which a regularly scheduled general election is held. In addition, a **12-day pre-general election report** must be filed for activity in connection with any general election held during an election year. Reports are required beginning with the first reporting period during which the aggregate cost for communications exceeds \$2,000 per election and for each period thereafter in which the organization makes any additional disbursements for advocacy communications in connection with the same election. 2 U.S.C. §431(9)(B)(iii); 11 CFR 100.8(b)(4), 104.6 and 114.3.

ADVISORY OPINIONS

ALTERNATE DISPOSITION OF ADVISORY OPINION REQUESTS

AOR 1987-10: Contributions to Presidential Primary Candidate's 1988 Campaign Used to Retire 1984 Presidential Campaign Debts

The requester withdrew the advisory opinion request in a letter of October 14, 1987.

AOR 1987-28: Party Expenditures as Contributions to Candidates or Operating Expenditures

The requester withdrew the advisory opinion request in a letter of November 5, 1987.

ADVISORY OPINIONS: SUMMARIES

An Advisory Opinion (AO) issued by the Commission provides guidance with regard to the specific situation described in the AOR. Any qualified person who has requested an AO and acts in accordance with the opinion will not be subject to any sanctions under the Act. Other persons may rely on the opinion if they are involved in a specific activity which is indistinguishable in all material aspects from the activity discussed in the AO. Those seeking guidance for their own activity, however, should consult the full text of an AO and not rely only on the summary given here.

AO 1987-26: Sponsoring Corporation's Use of Abbreviated Name for PAC

The Principal Mutual Life Insurance Company (the Company) may not change the official name of its separate segregated fund (the PAC) from the "Principal Mutual Life Insurance Company Federal Political Action Committee" to the "Principal Financial Group Federal Political Action Committee," a name which incorporates the Company's new service mark. The name change is not acceptable because the new name would not include the full name of the PAC's sponsoring organization (i.e., the Company). 2 U.S.C. §432(e)(5). Nor may the Company use the abbreviated name, "Principal FEDPAC," for the PAC's letterhead and checks. The word "Principal" in "Principal FEDPAC" is not a clearly recognized abbreviation by which the Company is commonly known and thus does not adequately inform the public that the Company sponsors the PAC.

The Company may, however, identify the PAC by using the abbreviated name, "Principal

Financial Group FEDPAC," on the PAC's checks and letterhead. Since the Company has used its service mark, "Principal Financial Group," to promote its new corporate identity in both its annual report and in the Standard and Poors Register, this abbreviated name assures identification of the Company as the PAC's sponsoring organization. The Company must, however, include the PAC's official name, along with its abbreviated name, on all statements and reports filed with the Commission and on all required disclosure notices. 2 U.S.C. §432(e); 11 CFR 102.14(e); 109.3 and 110.11. (Date issued: October 23, 1987; Length: 3 pages)

AO 1987-27: Services Provided to Presidential Campaigns by Telephone Companies

The Bell Atlantic Company (the Company) may provide 1988 Presidential campaigns with Company services to coordinate their needs for certain local and long distance telephone services in any area of the United States. The Company's services will not constitute prohibited in-kind contributions to the campaigns because the campaigns will adequately compensate the Company for the services. In the course of its regular business, the Company provides its large customers with account executives without imposing additional charges. Under a plan proposed by the Company, it will not provide any other types of services to the campaign as, for example, campaign consulting services. The proposed services will be offered to all Presidential campaigns on a nonpartisan basis.

Services Provided; Terms

The Company, and its six regional companies, may enter into agreements with the Presidential campaigns. The agreements will significantly reduce the financial risks of providing services to these special customers (e.g., inadequate account security and the lack of a meaningful deterrent to nonpayment).

Under a Reciprocal Agreement, a telephone company chosen by the campaign will provide a coordinator to centralize and service all the campaign's local and long distance telephone needs. For example, the coordinator will handle all the campaign's requests for local services provided by the other participating telephone companies and consolidate all the campaign's telephone bills.

In return for the services of a coordinator, the campaign must agree to the terms of a National Payment Agreement. Under the agreement, the campaign must:

1. Place all requests for services through specified agents of the campaign;
2. Provide the amount of financial security requested by the coordinator and;

3. Pay consolidated bills submitted at least three times a month, within 10 days of their submission.

The Act prohibits a corporation from making contributions, including in-kind contributions of services, in connection with federal elections. 2 U.S.C. §441b(b)(2); 11 CFR 100.7(a)(1)(iii) and 114.1(a)(1). Goods and services provided by corporate vendors to a candidate may result in prohibited contributions to the candidate's campaign if they are provided at less than the usual and normal charge. Under the stringent terms of the agreements made with the candidates, however, the Company will be assured of adequate compensation for providing the coordinating services and thus avoid making prohibited in-kind contributions to the campaigns.

The Commission expressed no opinion concerning the possible ramifications of the Company's proposed plan on the Modification of Final Judgment in a court action involving the Company. Such issues are beyond the agency's jurisdiction. (Dated issued: October 30, 1987; Length: 5 pages)

PUBLICATIONS

NEW EDITIONS OF FEC BROCHURES AVAILABLE

The Commission recently issued updated editions of three FEC brochures.

- o Public Funding of Presidential Elections gives a brief history of Presidential public funding and describes, in layman's terms, how the process works. It explains the ways individuals may support publicly funded candidates and the various materials on Presidential campaign finance available from the Commission.
- o State Computer Access to FEC Data, revised to reflect programmatic changes, describes an FEC project that provides state election offices with direct computer access to FEC campaign finance information. (Eleven state offices are currently participating in the project. In 1988, fourteen additional state election offices will begin to participate in the project.)
- o Free Publications, recently updated, describes informational materials available from the FEC and provides a convenient order form.

Copies of these brochures are available free of charge. Contact the Information Services Division, FEC, 999 E Street, N.W., Washington, D.C. 20463; or call 202/376-3120 or, toll free, 800/424-9530.

COURT CASES

DCCC v. FEC

On October 23, 1987, the U.S. Court of Appeals for the District of Columbia Circuit issued an opinion in Democratic Congressional Campaign Committee (DCCC) v. FEC (No. 86-5661), which partially affirmed an earlier decision by the U.S. District Court for the District of Columbia* in the suit. The appeals court affirmed the district court's ruling that the FEC's dismissal of an administrative complaint resulting from a deadlock vote on the merits of the complaint was subject to judicial review. However, since the appeals court lacked a Commission explanation for the dismissal, it rejected the district court's finding that the dismissal was contrary to law. Instead, the court remanded the suit to the district court with instructions that the district court, in turn, remand the suit to the Commissioners for an explanation of why they voted to dismiss the complaint.

Background

This case arose when the DCCC, a national committee of the Democratic Party, filed suit with the district court in July 1986. The suit challenged the FEC's dismissal of an administrative complaint which DCCC had filed against the National Republican Congressional Committee (NRCC) in December 1985. In the administrative complaint, DCCC stated that newspapers had reported that NRCC had spent \$10,000 for mailings to the Congressional district of Rep. St Germain (D., R.I). DCCC stated that the mailings had encouraged recipients to petition the House Ethics Committee to investigate newspaper charges that "Cong. St Germain has amassed a multimillion dollar personal fortune by using his public position to help wealthy investors." DCCC alleged that NRCC had failed to allocate the \$10,000 to NRCC's coordinated party spending limits on behalf of its eventual candidate who would challenge Congressman St Germain. DCCC based its allegation on an FEC advisory opinion it had received concerning the issue of coordinated party expenditure limits.**

The General Counsel recommended the Commission find "reason to believe" that the NRCC had failed to allocate the mailing expenses as coordinated party expenditures. However, on

continued

*The district court's decision in the suit was summarized in the November 1986 Record, p. 4.

**Coordinated party expenditures are limited expenditures which may be made by party committees on behalf of federal candidates in general election campaigns.

June 5, 1986, the Commission deadlocked in its vote on whether there was "reason to believe" NRCC had violated the election law. Subsequently, by a unanimous vote, the Commission closed the file on the complaint.

District Court Ruling

Initially, the court noted that, even though the Commission's dismissal of the complaint had resulted from its deadlock on the merits of the complaint, the DCCC still had "the right [under 2 U.S.C. §437g(a)(8)] to seek review of an adverse outcome."

The court went on to consider the merits of DCCC's complaint. The court concluded that the "NRCC mailer conveys an 'electioneering message' as defined by the FEC's own advisory opinions and as interpreted by its General Counsel. Thus the FEC's dismissal of the plaintiff's complaint was 'contrary to law.'"

FEC Appeal

On July 16, 1987, the FEC filed an appeal of the district court's decision with the U.S. Court of Appeals for the District of Columbia Circuit (No. 86-5661). The FEC argued that "authoritative legislative history...demonstrate[d] that section 437g(a)(8) [of the election law] was not intended to authorize judicial review" of the agency's dismissal of an administrative complaint which results from a deadlock vote on the merits of the complaint.* Moreover, the FEC contended that "...even apart from the controlling legislative history of section 437g(a)(8), the courts have traditionally found agency deadlocks that do not resolve substantive issues to be inappropriate for judicial review." The FEC further argued that the district court should not have ruled on the merits of DCCC's administrative complaint but should have limited its role to determining whether the FEC's dismissal of the complaint "could be rationally justified." The FEC claimed that "the district court's failure to limit its review to this narrow question [ran] afoul of Congress's expressed intent not to 'work a transfer of prosecutorial discretion from the Commission to the courts... and was therefore erroneous."

Appeals Court Ruling

The appeals court concurred with the district court's finding that the FEC's dismissal of the complaint in this case was subject to judicial

review, but it rejected the lower court's ruling that the FEC's dismissal of the complaint was contrary to law.

To the contrary, the court found that "because §437g(a)(8)(A) provides broadly for court review of an FEC order dismissing a complaint...we resist confining the judicial check to cases in which...the Commission 'act[s] on the merits.'" The court further noted that the explanation of the provision in the legislative history occurred three years after Congress originally enacted the provision. However, the court limited its decision to the narrow circumstances presented in the case, "specifically a general counsel recommendation to pursue the complaint in fidelity to FEC precedent in point."

Furthermore, the appeals court did not agree with the district court's resolution of the merits of DCCC's administrative complaint. "Because we have no explanation why three Commissioners rejected or failed to follow the General Counsel's recommendation, we are unable to say whether reason or caprice determined the dismissal of DCCC's complaint," the court said. The court therefore held that "the Commission or the individual Commissioners should first be afforded an opportunity to say why DCCC's complaint was dismissed in spite of the FEC's General Counsel's recommendation."

NRA v. FEC

On October 19, 1987, the U.S. District Court for the District of Columbia dismissed a suit in which the National Rifle Association of America (NRA) challenged the FEC's dismissal of an administrative complaint, which NRA had filed against Handgun Control Inc. (HCI). (NRA v. FEC; Civil Action No. 86-2285) The court found that NRA's administrative complaint constituted an untimely appeal of an earlier FEC decision. See 2 U.S.C. §437g(a)(8)(B).

Background

NRA's suit challenged the FEC's dismissal of NRA's third administrative complaint alleging violations of the election law by Handgun Control Inc. (HCI), an incorporated membership organization that supports restrictions on gun ownership. All three of NRA's administrative complaints challenged HCI's status as a membership organization under the election law.

The first administrative complaint resulted in a conciliation agreement with the FEC in which HCI was required to: 1) reconstitute itself as a membership organization and 2) pay a \$15,000 civil penalty. In its second and third administrative complaints, NRA alleged that HCI: 1) had not complied with the conciliation agreement and 2) had violated section 441b(b)(4)(A)(i) of the election law by soliciting contributions to its separate

**If the Commission considers a case and is evenly divided as to whether to proceed, that division... is not subject to review anymore than a similar prosecutorial decision by a U.S. attorney.* See legislative history of 2 U.S.C. Section 437g(a)(8)(A) at 125 CONG. REC. 36,754 (1979) (emphasis added), reprinted in FEC, Legislative History of the FECA Amendments of 1979, at 549.

segregated fund from individuals who were not HCI members.

In dismissing NRA's second administrative complaint, the FEC found that HCI qualified as a membership organization, even though it had improperly applied the membership requirements retroactively to past contributors. With respect to NRA's third administrative complaint, the FEC found that the allegations were virtually identical to those raised in NRA's second complaint. Consequently, the agency dismissed the third complaint.

In its suit, NRA asked the court to: 1) declare that the FEC's dismissal of its third administrative complaint was contrary to law and 2) issue an order directing the FEC to initiate enforcement proceedings against HCI within 30 days of the court's order.

The FEC argued that, under section 437g(a)(8)(B) of the election law, a party challenging the agency's dismissal of an administrative complaint must file suit within 60 days after the date of dismissal. NRA did not petition for review of the FEC's dismissal of its second administrative complaint within the statutory time period. Instead, NRA reasserted its previously dismissed claim in a third administrative complaint which, the FEC contended, amounted to nothing more than an attempt to obtain review beyond the 60-day period.

In dismissing NRA's suit, the court concurred with the FEC: "Regardless of how one would characterize the record herein, it is apparent that the issues and facts in all three complaints are substantially similar. More importantly, however, it is clear that plaintiff failed to appeal the defendant's decision in the second complaint within the time-period allowed by law."

On October 26, 1987, NRA filed an appeal of the district court's decision with the U.S. Court of Appeals for the D.C. Circuit.

FEC v. HARVEY FURGATCH

On October 5, 1987, the U.S. Supreme Court denied Mr. Harvey Furgatch's petition for a Writ of Certiorari in a suit brought against Mr. Furgatch by the FEC. (*FEC v. Furgatch*; Civil Action No. 87-108) In April 1987, the U.S. Court of Appeals for the Ninth Circuit had denied Mr. Furgatch's petition for a rehearing of the court's decision in the suit. The appeals court had also rejected Mr. Furgatch's suggestion for a rehearing of the suit by a full panel of its judges.

In its January 1987 decision, the appeals court confirmed the FEC's claim that Mr. Furgatch should be held liable for violations of the election law resulting from: 1) Mr. Furgatch's failure to report as independent expenditures his payments for newspaper ads expressly advocating President Jimmy Carter's defeat in the 1980 gen-

eral election and 2) his failure to state in one of the ads that the communication was not authorized by a candidate or a candidate's committee. For a summary of the appeals court's decision, see page 5 of the March 1987 Record.

NEW LITIGATION

DCCC v. FEC (Suit Two)

The Democratic Congressional Campaign Committee (DCCC), a national committee of the Democratic Party, asks the district court to:

- o Declare that the FEC acted contrary to law in failing to act on an administrative complaint within 120 days after DCCC had filed the complaint on April 28, 1987; and
- o Issue an order directing the FEC to act on issues raised in the administrative complaint within 30 days of the court's decision. (See 2 U.S.C. §437g(a)(8)(A).)

In papers filed with the court, DCCC states that its administrative complaint alleged violations of the election law by a political committee and various individuals who had established two "purportedly nonpartisan tax-exempt corporations" to serve their "broad political purposes." (DCCC states that the respondents were the president and board members of the Sentinel, the National Endowment for the Preservation of Liberty (NEPL) and the American Conservative Trust, a political committee registered with the FEC.)

Specifically, DCCC claims in this suit that its administrative complaint presented evidence that respondents had sponsored media ads which: 1) were designed to solicit voter opposition to Democratic House candidates in the 1986 general elections and 2) were targeted to certain Congressional districts. DCCC complained that, in their efforts to defeat Democratic candidates, respondents had violated the election law by failing to comply with:

- o The prohibition on the use of general corporate funds to influence the outcome of federal elections;
- o The reporting requirements for contributions and expenditures; and
- o The applicable contribution limits.

DCCC further said that the respondents had also failed to register NEPL and Sentinel as political committees or, alternatively, to establish a separate segregated fund for each organization.

U.S. District Court for the District of Columbia, Civil Action No. 87-2793, October 15, 1987.

INDEX

This cumulative index lists advisory opinions, court cases and 800 Line articles published in the Record during 1987. The first number in the citation refers to the "number" (month) of the Record issue; the second number, following the colon, indicates the page number in that issue.

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STATISTICS

FEC RELEASES 1988 PRESIDENTIAL REPORT

Democratic and Republican Presidential primary candidates active in the 1987-88 Presidential election cycle raised over \$70 million for their campaigns through September 30, 1987. These candidates spent a total of \$55 million during the same period.

These figures, which are derived from an FEC computer-generated summary of Presidential activity, appeared in a report released on October

23, 1987. In addition to graphically depicting the campaign activity of the major party candidates, the report provides comparative figures for 1980 and 1984 Presidential campaign activity. Figures in the report have been adjusted for contribution refunds, loan repayments and any refunds or rebates received by the campaigns.

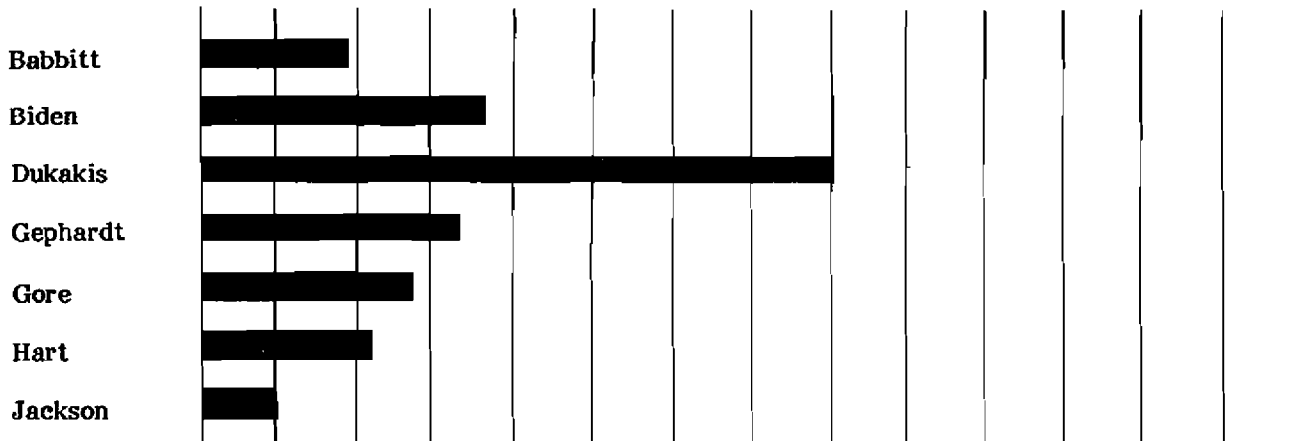
Chart I below depicts the receipts of major party candidates. Chart II on pages 10 and 11 shows the spending by each candidate's campaign on a state-by-state basis. The maps allow readers to identify those states in which candidates have concentrated early campaign spending.

To obtain a copy of the report, call the Public Records Office: 202/376-3140 or, toll free, 800/424-9530.

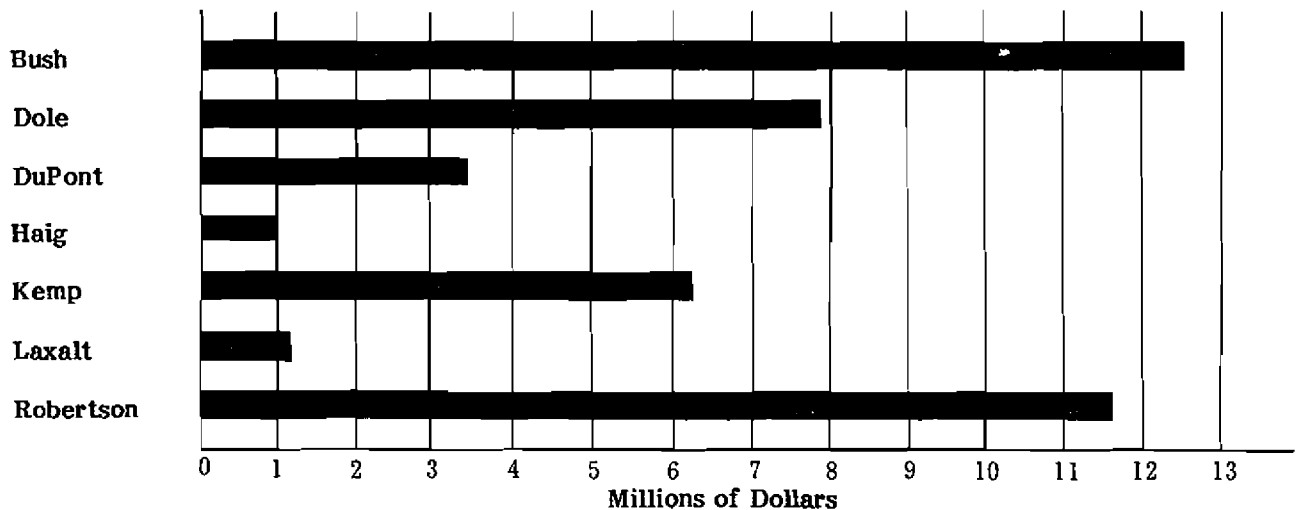
**CHART I
RECEIPTS OF
PRESIDENTIAL PRIMARY CANDIDATES
THROUGH 9/30/87**

*SIMON
OMITTED*


DEMOCRATIC CANDIDATES



REPUBLICAN CANDIDATES

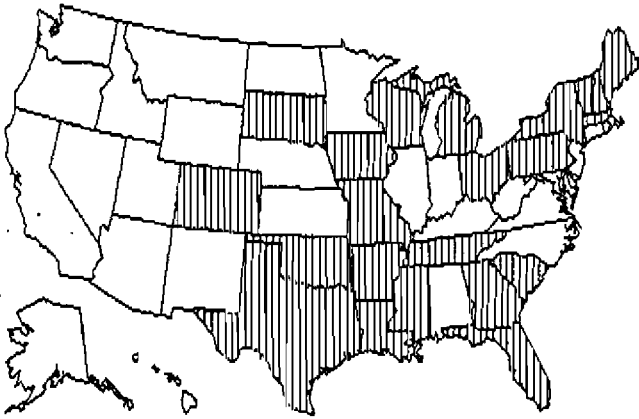


**CHART II
STATE-BY-STATE SPENDING
OF PRESIDENTIAL PRIMARY CANDIDATES
THROUGH 9/30/87***

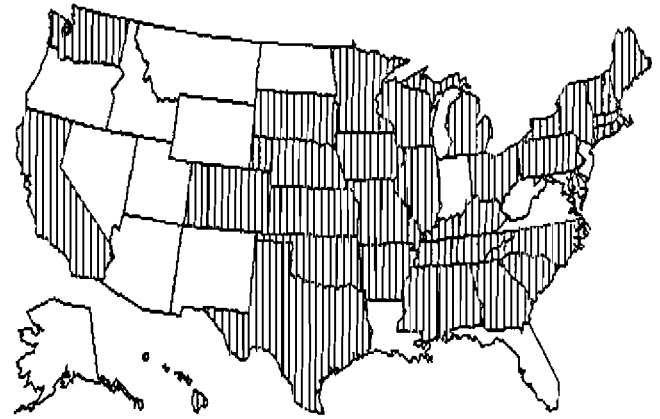
 Spending of \$5,000 or More

REPUBLICAN CANDIDATES

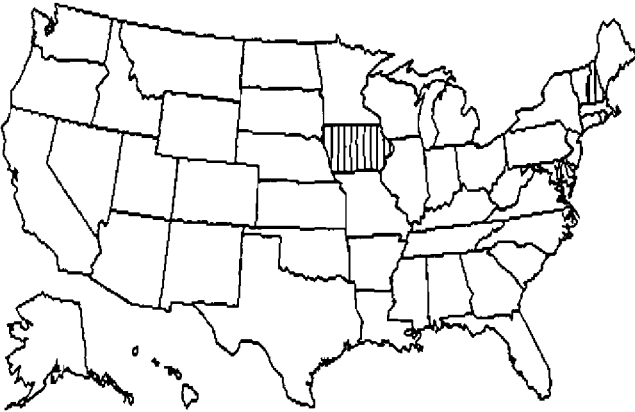
Bush



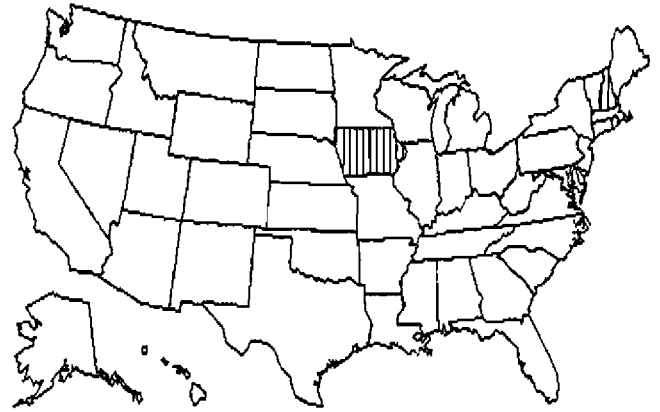
Dole



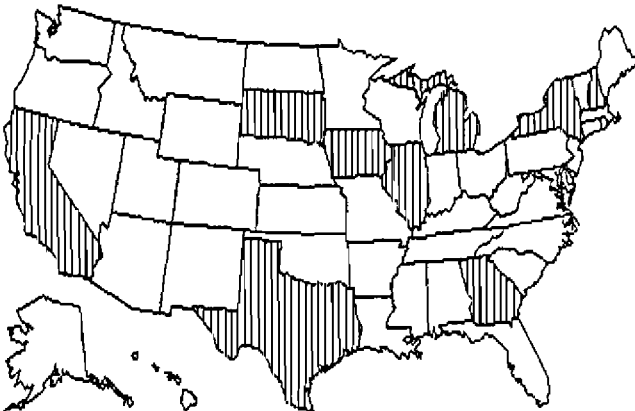
DuPont



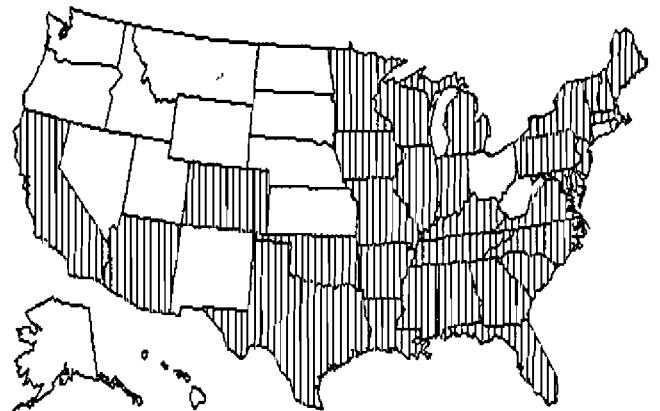
Haig



Kemp

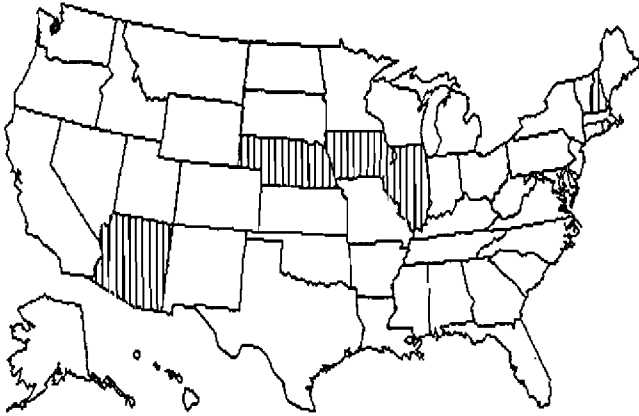


Robertson

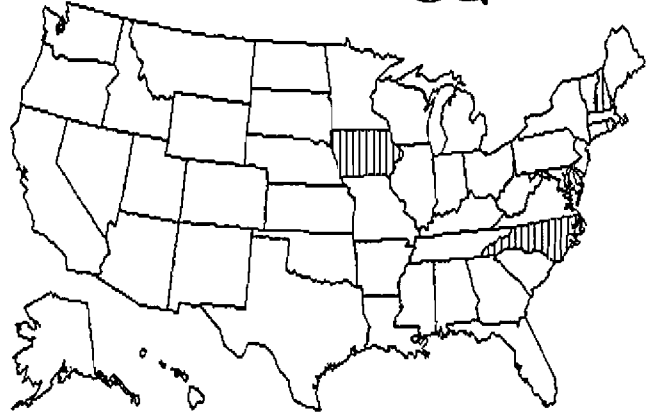


DEMOCRATIC CANDIDATES

Babbitt



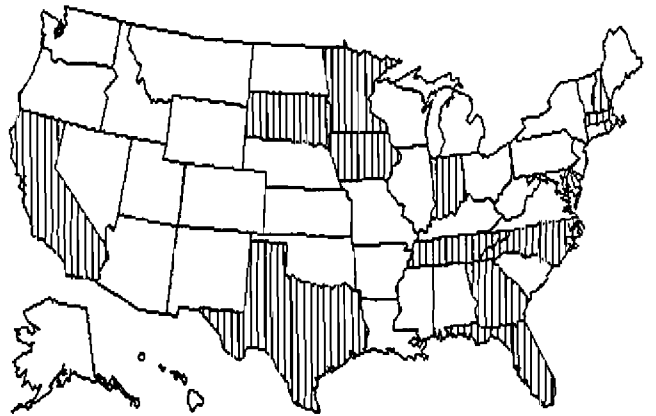
~~Dukakis~~ Gore



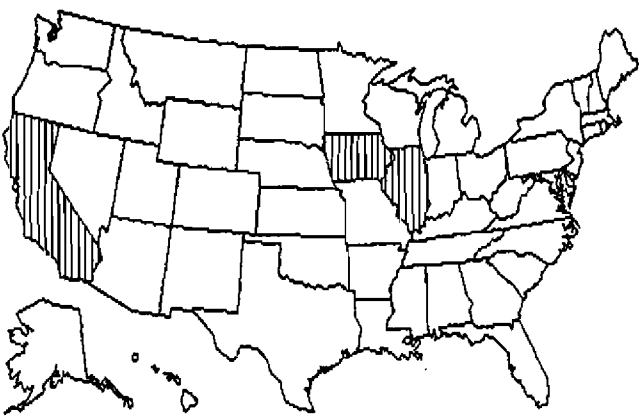
Gephardt



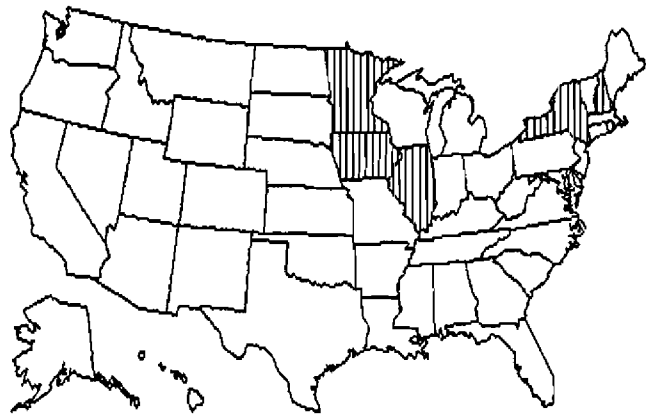
~~Gore~~ Dukakis



Jackson



Simon



*Data for different campaigns may not be comparable. Although FEC Regulations require state-by-state allocation of money spent for campaign expenses (e.g., media, staff, equipment), each campaign employs its own method for determining the distribution of those expenses. Certain expenditures may not be allocated to any state, since they are more closely related to the campaign's national effort. Thus, a highly centralized campaign, with a large national staff, might report a smaller proportion of its operating expenses as allocable to given states than a decentralized campaign.

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