

### FEDERAL ELECTION COMMISSION

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

# REPORT OF THE AUDIT DIVISION ON THE

D.C. REPUBLICAN COMMITTEE

1976 D.C. REPUBLICAN DINNER COMMITTEE 1978 D.C. REPUBLICAN DINNER COMMITTEE

# I. Background

#### A. Overview

This report is based on an audit of the D.C. Republican Committee, the 1976 D.C. Republican Dinner Committee, and the 1978 D.C. Republican Dinner Committee ("the Committees") undertaken by the Audit Division of the Federal Election Commission in accordance with the Commission's audit policy, to determine whether there has been compliance with the provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). The audit was conducted pursuant to Section 438(a)(8) of Title 2, United States Code, which directs the Commission to make from time to time audits and field investigations with respect to reports and statements filed under the provisions of the Act.

The D.C. Republican Committee registered with the Clerk of the United States House of Representatives on April 17, 1972 as the Republican party committee of the District of Columbia. It maintains its headquarters in Washington, D.C. The 1976 D.C. Republican Dinner Committee, an affiliated-subordinate committee, registered with the Federal Election Commission on April 13, 1976. Also an affiliated committee, the 1978 D.C. Republican Dinner Committee, registered with the Commission on February 22, 1978. Both dinner committees maintained their headquarters in Washington, D.C. The audit covered the period January 1, 1976 through March 31, 1978, the date of the latest report filed by two (2) of the three (3) Committees.

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



# B. Key Personnel

The principal officers of the D.C. Republican Committee during the period covered by the audit were Mr. Edmund Pendleton, Jr., Chairman, January 1 through June 14, 1976, Mr. Paul Hays, Chairman, June 15, 1976 through March 31, 1978, Mr. Joseph C. McLaughlin, Treasurer during the period January 1, 1976 through June 30, 1976, Mr. Rockwood H. Foster, Treasurer, during the period June 30, 1976 through June 29, 1977 and Mr. Otis R. McCollum, Treasurer during the period June 30, 1977 through March 31, 1978.

The principal officers of the 1976 D.C. Republican Dinner Committee during the period covered by the audit were Mr. William D. Ruckelshaus, Chairman, and Mr. Otis R. McCollum, Treasurer.

The principal officers of the 1978 D.C. Republican Dinner Committee during the period covered by the audit were Mr. Raymond P. Shafer, Chairman, and Mr. J. Robert Ritenour, Treasurer.

#### C. Scope

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

# II. Auditor's Statement and Description of Findings

It is the opinion of the Audit staff based upon examination of the reports and statements filed and the records presented, that, the D.C. Republican Committee, the 1976 D.C. Republican Dinner Committee, and the 1978 D.C. Republican Dinner Committee are not political committees as defined by the Act and are not subject to the jurisdiction of the Commission.

This opinion is based on the fact that these Committees do not support candidates in connection with Federal elections in excess of \$1,000 in a calendar year. The D.C. Republican Committee exists to support local party activity and local elections. The dinner committees organize to hold an annual fundraiser to fund the D.C. Republican Party. Although support of candidates for Federal election may be made in the future, the Committees will then make a determination of whether they are required to register and file reports. These Committees registered and filed reports pursuant to the Act believing that each was required to do so.

