

Project On Government Oversight

Re-Establishing Institutional Integrity at the FEC:

Ten Common Sense Campaign
Finance Disclosure Reforms

March 5, 1998

1100 G Street, NW, Suite 900 • Washington, DC 20005 • (202) 347-1122
Fax: (202) 347-1116 • E-mail: pogo@pogo.org • www.pogo.org

POGO is a 501(c)3 organization

FOREWORD

The Project On Government Oversight has documented core problems with the Federal Election Commission's management of information. POGO has brought forth specific examples of the FEC's disregard for the reliability and reputation of information taken from campaign finance reports of candidates and political committees. POGO has outlined specific low-cost fixes that can be implemented immediately. It is in the best interest of campaign, political committees, the FEC, the media and the general public to take aggressive action now to correct these deficiencies.

Kent C. Cooper
Executive Director
The Center for Responsive Politics

This report was made possible in part by grants from The Joyce Foundation, Alida R. Messinger and The Florence and John Schumann Foundation. The Project On Government Oversight would also like to thank the Center for Responsive Politics, the New York City Campaign Finance Board and the Federal Election Commission for their invaluable contributions to this report.

The **Project On Government Oversight's** (POGO) mission is to investigate, expose, and remedy abuses of power, mismanagement and subservience to special interests by the federal government. POGO uses examples of systemic problems with the intent to make positive change in public policy.

TABLE OF CONTENTS

Introduction	4
Impact	5
Lumping Honest Mistakes with Willful Misconduct	6
Background	7
CHART 1. Candidates' Reported Receipts v. FEC's Total of PAC-Reported Contributions	9
CHART 2. Candidates' Reported Receipts v. POGO's Total of Unexplained PAC Contributions	10
POGO's Ten Common Sense Reforms	11
1. Utilize Existing Checks and Balances: Compare Databases	11
2. Make Compilation and Filing of Data Uniform by Campaign-Cycle	12
A: Group FEC Data by Campaign-Cycle	12
B: Candidates and PACs Should File by Campaign-Cycles	13
3. Eliminate Irregular PAC Names	13
4. Eliminate Duplicate Entries	15
5. Candidates Should Report Returned Checks	16
6. Notify Candidates of All "In-Kind" Contributions	17
7. FEC Needs Better Tools to Encourage Compliance	18
8. Mandatory Electronic Filing	19
9. Streamline Senate Filing	20
10. Streamline Joint Fund-Raisers and Multi-Candidate Committees	21

Introduction

“It [The Federal Election Commission] was set up to be a toothless tiger. You never worry about it because they’re — by the time they catch up to anything, any mistake, legitimate mistake or deliberate circumvention, the election’s over with. Who cares? So they fine you.” Former Representative Tony Coelho (D-CA)¹

The Project On Government Oversight (POGO) has undertaken a major investigation into the Federal Election Commission’s (FEC) Political Action Committee (PAC) contribution disclosure system. POGO found that the current status of the FEC’s data creates opportunities for unfair allegations of misconduct against candidates. We discovered that **hundreds of thousands of dollars in contributions are unaccounted for, improperly listed, or otherwise missing from FEC data**. Practical, common sense reforms, however, would identify and remedy the existing inaccuracies that currently plague the campaign finance disclosure system.

POGO’s investigation took months of original research and consultations with numerous campaign finance experts, including senior FEC staff and officials and the independent Center for Responsive Politics. POGO discovered that surprisingly, although both candidates and PACs each must submit financial contribution data, **these numbers are never compared**. Current FEC data inaccuracies are often very misleading.

At the beginning of this investigation, POGO believed that the large number of discrepancies and the sizable differentials associated with congressional candidates might be the result of hidden PAC contributions or some other nefarious activity on the part of candidates. It was not long into our investigation, however, that we found that it was the FEC’s current disclosure system itself that was causing the misleading differentials.

Review of these differentials led POGO to discover several systemic flaws and their realistic reforms, many of which have been suggested in bills before Congress and in the FEC’s annual reports to Congress. POGO’s investigation and report provides the tangible evidence needed to achieve the implementation of these campaign finance reforms.

The current system, including its flaws, is the creation of both political parties as well as the FEC. No single entity should be blamed for its mistakes, but lessons can be learned from more successful efforts, such as the New York City Campaign Finance Board (CFB).²

¹ *The News with Brian Williams*, MSNBC, February 27, 1997.

² See Appendix A, Lessons Learned From The New York City Campaign Finance Board.

However, it does not appear that change is likely to emanate from within the FEC without direction and funding from Congress. The FEC is resigned to reacting to outside complaints of illegal activity, rather than using the resources at its disposal — the information it collects from contributors and candidates. As a result the FEC accepts the inaccuracies in their data and regards them as tolerable. In fact, it was expressed by FEC officials that even with the proper resources, it was not clear that the FEC would spend them on fixing the systemic problems POGO discovered. This acquiescence is not only harmful to the public and the media, who rely on accurate disclosure, but also to the candidates who are portrayed by the FEC data as intentionally concealing contributions. In addition, contrary to the FEC's assessment, POGO believes that these reforms would, in the long-run, save the FEC both time and money. In the end, the FEC's very mission is compromised by its bunker mentality.³

On April 7, 1997, President Clinton sent a letter to the Speaker of the House of Representatives pleading for additional FEC appropriations and a strengthening of the FEC. President Clinton stated, "... the agency [FEC] plainly lacks the resources it needs to keep pace with the rapidly rising volume of campaign spending and electoral activities." He added that steps must be taken to strengthen the FEC's ability to stop improper practices. One step that should assist the FEC in improving its performance is the financial boost it recently received in the FY99 Budget proposal, which estimates that the FEC budget would increase from \$28 million to an estimated \$31 million in FY98 and \$37 million in FY99.

Impact

"The FEC collects and distributes information that directly affects the public's perception of both campaigns and candidates. That they knowingly distribute information that is false without any warning to the public is totally unacceptable. Under our system of justice, you should not be declared guilty and be forced to prove your own innocence." Representative Bill Archer (D-TX)⁴

The most immediate impact of the reforms listed below would be to allow the FEC to better discern genuine campaign finance infractions from data errors and therefore more effectively use their resources to enforce campaign finance laws. Even high-level FEC officials have admitted that they have had to assume a level of "chaos" in their numbers, making enforcement of the law sporadic at best. FEC sources stated that due to limited resources, some violations will have to slip through the system.

³ See Appendix B, FEC Background.

⁴ Response to POGO, March 3, 1998.

The longer-range intention of our work is to rebuild the integrity of the FEC and the campaign finance disclosure process. POGO is recommending tangible reforms of FEC guidelines as well as of candidate and PAC reporting requirements that will provide significant improvements to disclosure of campaign contributions. If the more comprehensive campaign finance reforms currently being debated are ever to pass, the FEC will ultimately be responsible for overseeing and regulating the \$100,000 contributions that are fueling this debate. If the FEC is not equipped to handle the current oversight of \$1,000 and \$5,000 PAC contributions, how can it be expected to tackle the big dollars? We believe our suggested reforms can lead to the institution-building necessary for positive systemic change.

These reforms would also assist the FEC in distinguishing between honest mistakes and willful misconduct, so as not to waste enforcement resources.

Furthermore, every Congressional candidate would benefit from the FEC's improved ability to more accurately and more swiftly disclose accurate campaign finance information. The reforms would preempt false accusations made by opponents relying on inaccurate FEC data.

The general public would stand to gain the most from POGO's reforms, as campaign contributions would be more accurately reported in FEC databases. All disclosure of information is not always good disclosure — the public must have access to campaign finance information that is both accurate and timely. If it is not, the information is of little use and can even at times be harmful. The public has the right to obtain accurate campaign finance information from the federal government.

Lumping Honest Mistakes with Willful Misconduct

Most of the errors POGO found in its investigation could be categorized as honest mistakes on part of the committees, although many violate current campaign finance law.

The individuals used as examples throughout this report are just that — examples to prove the systemic flaws in the system. The discrepancies found in their reports were overwhelmingly caused by the flaws in the FEC's system and could have been avoided if our recommended reforms were implemented. To indicate that the candidates in no way intended to provide inaccurate or incomplete information, a number of the candidates told POGO they were going to amend their FEC filings as a result of our inquiries.

Even before our inquiry, for example, Senator Ron Wyden (D-OR) amended 57 items, including “inadvertent accounting errors,” an \$87,012 typographical error and contributions that exceeded contribution limits.⁵ Why do we point out this correction? These amendments were submitted to

⁵ Sonner, Scott. *The Associated Press*, “Wyden says campaign apparently violated FEC rules,” January 31, 1997.

the FEC only after his campaign conducted its own investigation responding to a potential dispute with tax collectors. At no point during or after the election did the FEC pinpoint problems with Sen. Wyden's campaign disclosures. To illustrate the prevalence of bad information in the FEC data, Sen. Wyden's amendment preceded POGO's inquiry which identified additional discrepancies.

Because the FEC disclosure system is flawed, honest mistakes slip through as easily as egregious misconduct. For example, in 1994, the Associated Press (AP) reported that Representative Mel Reynolds (D-IL) failed to report to the FEC thousands of dollars in contributions over a three-year period. The AP found \$76,000 in unreported contributions, involving 72 different PACs.⁶ The investigation proved that many of these checks were deposited by Reynolds or his campaign. Reynolds contended that the money was spent for legitimate campaign purposes. However, the contributions were not reported to the FEC by his campaign. Due to the FEC's failure to compare PAC reports to candidate reports, this impropriety went undetected for many years -- discovered only later by the media.

The amount of money involved in Mel Reynolds' case, however, would not have stood out in the current state of the FEC databases. As you can see from Appendix C, a \$76,000 differential between a candidate's receipts and PAC disclosures would not raise eyebrows at the FEC.

Mel Reynolds' \$76,000 unreported PAC contributions would not have put him in the top ten candidate differentials in 1995-1996. Until we resolve the issues that POGO has detailed in this report, other violations like Mel Reynolds' are likely to remain unnoticed, while innocent mistakes can be cast as crimes.

Looking at the candidate differentials (Chart 1), Senator Wyden (D-OR) and Representative Gephardt (D-OR) both would appear to have committed various campaign finance disclosure violations, when in fact, a large portion of their differential was due to transfers of money from their other campaigns.⁷

Background

POGO began this project by examining FEC data compiled by the Center for Responsive Politics into one user-friendly document. This document detailed the discrepancies between the contribution receipts reported by each candidate and the disbursements reported by PACs. In August 1997, nine months after the 1996 election, using the FEC's own data we found **only four candidates out of**

⁶ Strong, Tom, *The Associated Press*, "Indicted Congressman's FEC Reports Fail to Disclose Donations," August 26, 1994.

⁷ Senator Wyden transferred \$497,440 into his Senate campaign from his "Wyden for Congress" House campaign and Representative Gephardt transferred \$50,000 into his House campaign from his "Gephardt for President Committee Inc."

nearly 500, had reported receiving the same amount of PAC money that the PACs reported contributing.⁸ In other words, every other candidate that ran for election in 1996 had either over-reported, or in the majority of cases, under-reported, PAC contributions.

Utilizing this data, POGO selected ten candidates to investigate in detail. The candidates were chosen according to their reporting discrepancies.⁹ (See Chart 1) After manually attempting to match each of the ten candidates' receipts to disbursements in FEC records, there remained a number of discrepancies which could not be resolved, requiring POGO to contact the candidates and the PACs for explanations. (See Chart 2) Many of the candidates and the PACs confirmed the discrepancies as errors.

The responses we received, along with our continued analysis of the primary data, made it clear that there were several systemic flaws in the FEC's system. After our initial meetings with FEC officials, it was apparent that although several of our proposed solutions could be enacted unilaterally by the FEC, some of our recommendations would require Congressional sponsorship.¹⁰

POGO does not argue that these reforms will prevent all mistakes. There will always be some errors that will still slip through the FEC's system. Our intention is not to point out anomalies -- such as the \$1,500 contribution that was entered by the FEC as \$500, errors caused by mis-attributing contributions that were issued to Bob Smith (R-NH) and Chris Smith (R-NJ) but instead attributed to Gordon Smith (R-OR) or contributions that were missed by the candidates. Although these problems did occur, POGO moved to distinguish more substantial and systemic FEC malfunctions and has recommended ten reforms that will serve to help the FEC be more efficient and effective, and protect candidates from unfair accusations of campaign finance deception or illegality.

⁸ See Appendix C, Comparison of Candidate Receipts with PAC Disbursements, p. C-5.

⁹ See Appendix D, Methodology.

¹⁰ See Appendix E, FEC Action vs. Legislative Action Required.

PROJECT ON GOVERNMENT OVERSIGHT

Chart 1

Candidates' Reported Receipts v. FEC's Total of PAC-Reported Contributions

Candidate	Candidates' Reported Receipts From PACs and Other Committees	FEC's Total of PAC-Reported Contributions (1)	Differential
Archer, William (R-TX)	\$965	\$25,125	\$24,160
Biden, Joseph (D-DE)	\$0	\$24,102	\$24,102
Gephardt, Richard (D-MO)	\$1,104,532	\$1,382,475	\$277,943
Gonzalez, Henry (D-TX)	\$42,400	\$93,125	\$50,725
Kind, Ronald (D-WI)	\$99,822	\$216,897	\$117,075
Leach, James (R-IA)	\$0	\$7,000	\$7,000
Shays, Christopher (R-CT)	\$7,550	\$15,200	\$7,650
Smith, Gordon (R-OR)	\$1,429,387	\$1,603,142	\$173,755
Warner, John (R-VA)	\$1,482,176	\$1,692,228	\$210,052
Wyden, Ron (D-OR)	\$911,826	\$1,470,315	\$558,489
TOTAL	\$5,078,658	\$6,529,609	\$1,450,951

(1) This column was calculated by the Center For Responsive Politics on 8/7/97 using FEC data. See Appendix C for a comparison of all candidates' receipts with PAC disbursements. This data was used by POGO, resulting in the above ten candidates being selected for review.

PROJECT ON GOVERNMENT OVERSIGHT

Chart 2

Candidates' Reported Receipts v. POGO's Total of Unexplained PAC Contributions

Candidate	Candidates' Reported Receipts From PACs and Other Committees	Unexplained Differentials After Manual Inspection of FEC Records (1)
Archer, William (R-TX)	\$965	\$22,191
Biden, Joseph (D-DE)	\$0	\$5,168
Gephardt, Richard (D-MO)	\$1,104,532	\$63,650
Gonzalez, Henry (D-TX)	\$42,400	\$11,500
Kind, Ronald (D-WI)	\$99,822	\$90,921
Leach, James (R-IA)	\$0	\$16
Shays, Christopher (R-CT)	\$7,550	\$9,070
Smith, Gordon (R-OR)	\$1,429,387	\$30,356
Warner, John (R-VA)	\$1,482,176	\$42,329
Wyden, Ron (D-OR)	\$911,826	\$52,071
TOTAL	\$5,078,658	\$327,272

(1) After manually attempting to match each of the ten candidates' receipts to disbursements in FEC records, there remained a number of discrepancies which could not be resolved, requiring POGO to contact the candidates and the PACs for explanations.

POGO's Ten Common Sense Reforms

“You should know that we have for some time been aware of discrepancies in the information available on the public record from the Federal Election Commission. Unfortunately, we have no control over the information entered by the FEC and are not aware of any method by which this information could be corrected.” John Tumbarello, Treasurer for Representative Richard Gephardt (D-MO)¹¹

POGO's investigation was limited to analyzing data involving PAC contributions, but many of our reforms could be applied to contributions from individuals as well. POGO proposes that the FEC and Congress fully consider and enact the following reforms.

1. Utilize Existing Checks and Balances: Compare Databases

The FEC does not compare PAC receipts reported by candidates with contributions reported by the PACs. The current system allows inaccuracies in FEC data to go unchecked and uncorrected. (See Charts 1 and 2 for examples of differentials between PAC reporting and candidate reporting, and Appendix C for a list of the differentials for all candidates in the 1996 election.)

Problem:

Total contributions reported by the PACs do not correspond with the receipts reported by each candidate. Discrepancies that occurred between candidate and PAC reports -- in some cases by as much as hundreds of thousands of dollars -- remain undetected and uncorrected. In fact, these discrepancies are so common that a zero balance is rare. This misinformation makes a candidate vulnerable to unfair accusations of improprieties.¹²

Solution:

The FEC should require its staff to compare the totals reported by the PACs (the FEC's "Long E-Index") with the totals calculated on the FEC's Campaign Summary Reports (the FEC's "L-Index") which document the amounts reported by the candidates.

¹¹ Response to the Project On Government Oversight, October 30, 1997, attachment.

¹² See Appendix C, Comparison of Candidate Receipts with PAC Disbursements.

Cost:

This reform would initially require a moderate amount of FEC staff time. However if other POGO reforms are implemented, many errors would be prevented, allowing the FEC to correct flawed data before requests for additional information are sent. In the long run, the FEC would save financial resources and staff time which currently is spent sorting through inaccurate information.

2. Make Compilation and Filing of Data Uniform by Campaign-Cycle

A: Group FEC Data by Campaign-Cycle

Currently the FEC assembles contribution data by two calendar year cycles rather than by two- and six-year campaign-cycles.

To perform this investigation, POGO was required to look at data from at least three different two-year cycles to identify contributions that were given to House candidates for their 1996 elections. For example, many of the candidates we investigated filed contributions they received in late 1996 in their 1997 midyear reports. Thus, in a House election, the 1995-1996 election-cycle data was just as important as the 1997-1998 cycle data in finding contributions designated for the 1996 elections. To compound matters, if a contribution were donated late in the 1994 calendar year, after the 1994 general election, 1993-1994 data could also include contributions for a candidate's 1996 elections.

A single incumbent Senatorial candidate, whose term of office is six years, might record contributions for their campaign under four or more two-year cycles, yet no consolidation of this data is ever made by the FEC.

Problem:

This system is extremely "user unfriendly." Information on contributions made either before or after the duration of the two-year cycle is scattered throughout other FEC's indices, creating an inefficient, if not useless, system of records. This scattering of information allows for unnecessary misrepresentations of a candidate's disclosure forms. It also makes identifying violations of contribution limits unnecessarily difficult. All of these problems contribute to an inaccessible campaign disclosure system.

Solution:

The FEC needs to group data by two- and six-year campaign-cycles. This change would prevent the mixing of campaign contributions from one campaign with another and would reduce unfounded accusations of hidden PAC contributions.

Cost:

This reform would require minimal initial costs to the FEC to reorganize its data.

B: Candidates and PACs Should File by Campaign-Cycles

Candidates and PACs file primary and general campaign data in monthly, quarterly and semiannual reports by calendar year. The FEC, on the other hand, must sort through this information and organize it in two-year databases. Campaign finance laws, however, do not correspond with calendar years, but with primary and general campaign-cycles. This process is time consuming and handicaps FEC's resources.

Problem:

PACs and candidates combine contributions for primaries and general campaigns with prior debt designations, contributions for previous or future elections and "in-kind" contributions by calendar year. Although these various designations are required, they often are not marked in FEC filings. The FEC and the public must sort through all of this information to discover and enforce campaign contribution violations.

Solution:

New legislation should simplify the process by requiring candidates and PACs to file by two- and six-year campaign-cycles. This reform may also require extending contribution limits from the current per-election basis to campaign cycles.

Cost:

A legislative change would be necessary to require filing by campaign-cycles, rather than by calendar year. The cost of notifying PACs and candidates of this change would be minimal.

3. Eliminate Irregular PAC Names

One of the most time-consuming aspects of this project was identifying and cross-referencing the irregular use of PAC names used by the candidates, the PACs and the FEC. Often during our investigation we were frustrated by the arbitrary use of shorthand for various PAC names. The following are some PACs whose names were recorded differently on various candidate's receipts, PAC disbursements and the FEC's index:

Name Used by the FEC	Name Used by the Candidate	Name Used by the PACs
Pacific Enterprises Companies Political Action Team	So. California Gas Co. PAT	Southern California Gas Company Political Action Team
VIAD Corp. Good Government Project	Dial Good Government Project	Dial Good Government
District No. 1 - PCD MEBA Political Action Fund - MEBA PAF and District No. 4 - NMU/MEBA AFL-CIO Political and Legislative Organization on Watch	Marine Engineers Beneficial PAC ¹³	District No. 1 - PCD, MEBA Political Action Fund and District No. 4 NMU/MEBA - Political and Legislative Organization on Watch
USA Waste Services Inc Employees for Good Government	Chambers Employees PAC	Chambers Employees' Good Government Committee

It is unreasonable to assume that outside parties, including constituents or the press, not to mention the FEC itself, would be capable of making a connection between the three sets of names without great difficulty.

Problem:

Different names for the same PACs appear in candidate, PAC and FEC records, so that it often appears that a candidate has not reported receiving a PAC contribution. This also impairs effective enforcement by the FEC, as the unmatched PAC names must be compared to ascertain if contribution limits have been observed.

Solution:

The FEC should enforce its current requirement that candidates and PACs use similar PAC names (i.e., the name printed on the check) and require already-established FEC I.D. numbers on all receipts and disbursements. This improvement would standardize and clarify the process, while increasing the likelihood of obtaining the correct information when performing computer or manual searches, especially as the FEC moves toward a searchable internet site.

¹³ Senator Wyden reported these PAC contributions as one, although the FEC listed them as two separate PACs with their own I.D. numbers, C00279380 and C00286401, respectively.

The FEC should include, with its existing list of PAC names, the corresponding I.D. numbers so that the PACs, the candidates, and the FEC are using identical information. Electronic filing would increase the use of uniform names because the FEC includes the list of names and I.D. numbers in the software as a condition for completing the entry.

Cost:

This reform would simply require the FEC to inform PACs and candidates that I.D. numbers must be included on all correspondence and that the candidates should use the PAC name printed on the check.

4. Eliminate Duplicate Entries

The FEC does not correct many duplicate entries in filings submitted by candidates. POGO's investigation also revealed that the FEC often unwittingly creates duplicate entries by assigning two different transaction numbers to the same contribution. These duplicate entries often are left uncorrected.

Of the ten candidates POGO investigated, four of them (Gephardt, Wyden, Warner and Smith) had a total of seven separate instances of duplicate entries. In each case, POGO examined the PAC disbursements to verify if one contribution had been issued or if two contributions had been given for the same amount on the same day. Every instance proved to be a duplication that the FEC should have corrected.¹⁴

Problem:

The FEC's inability to correct erroneous reporting of this kind creates phantom contributions in the candidate's receipt index. This problem again makes a candidate vulnerable to accusations of hiding PAC contributions or of violating contribution thresholds.

Solution:

Because the FEC already has a computer program that tags duplicate entries, once they are discovered, the FEC should send an inquiry to the PAC asking for confirmation of the two contributions.

Cost:

Only minimal resources would be required for the FEC to send out inquiries to the PACs for confirmation of the duplicate entry.

¹⁴ See Appendix F.

5. Candidates Should Report Returned Checks

Many times PAC contributions are returned by candidates, yet the PACs often do not report the unaccepted contribution to the FEC, although it is currently required. This notification should occur either through an amended filing or a negative entry on a subsequent filing that notifies the FEC that the contribution was not accepted.¹⁵

According to FEC data, POGO found that some candidates who vow not to accept any PAC contributions, in particular Senator Joe Biden (D-DE), Representative Bill Archer (R-TX) and Representative Christopher Shays (R-CT), show receipts of thousands of dollars from PACs.

Rep. Archer responded to POGO's inquiry by stating, **"Despite repeated requests, many PACs do not bother to amend their filings to reflect checks that were returned to them without being cashed. This has resulted in the past that my campaign is shown as receiving PAC checks when, in fact, none were accepted."**¹⁶ (Emphasis added)

Also in response to our inquiry, Peter Baryhydt, Campaign Manager for Rep. Shays, stated that Rep. Shays does not accept PAC contributions and simply mails any contribution back to the PACs. He added, **"It has been my experience that the FEC files for PAC contributions do not indicate when a contribution was returned undeposited."**¹⁷

Problem:

This failure to report returned contributions leaves the false impression that candidates have accepted money although it was returned to the PAC. In particular, this problem causes a dilemma for candidates who pledge not to accept any PAC money, because FEC records show them receiving PAC contributions, although the checks were returned. Candidates who do not accept PAC money can reconcile their reports, but other candidates who claim not to accept money from a specific PAC or PACs representing certain industries or having particular political agendas are more at risk. These candidates may not be able to prove the error until after an election.

Solution:

The FEC should recommend to candidates who return PAC contributions, that they provide the FEC with a list of the PACs and the returned contributions. Because some PACs do not

¹⁵ 11 CFR 104.8(d)(4).

¹⁶ Response to the Project On Government Oversight, October 20, 1997.

¹⁷ Response to the Project On Government Oversight, October 27, 1997.

report returned contributions, the candidates would be able, with minimal effort, to protect themselves against unfounded accusations.

Cost:

This reform would only require minimal additional FEC resources to notify the candidates of this policy change.

6. Notify Candidates of All “In-Kind” Contributions

PACs do not always inform campaign committees of their “in-kind” contributions, which are gifts of goods or services rather than money. Candidates often claim they were not aware of these contributions, although they were reported by the PAC to the FEC.

For example, John Ryan, Compliance Director for The Gephardt-in-Congress Committee (GIC), responded to POGO’s investigation by stating the following concerning “in-kind” contributions:

“In-kind contributions for which GIC did not receive any notice from the contributor. GIC is in the process of preparing amendments to the Federal Election Commission for its reports to reflect these in-kind contributions.”¹⁸

Senator Wyden’s campaign staff reported to POGO that they too were not notified by the PAC of certain “in-kind” contributions. In an effort to correct the record, Sen. Wyden also amended his filings by reporting these previously unknown contributions.¹⁹

Problem:

Campaign committees are unintentionally under-reporting contributions. PACs report “in-kind” contributions to the FEC, but do not always report them to the campaign. This lack of reporting may cause embarrassment for the candidate who does not report an “in-kind” contribution that had been donated to their campaign.

Solution:

The FEC should require PACs to notify campaign committees of all “in-kind” contributions. Until this reform is required, candidates will continue to under-report contributions given to their campaign.

¹⁸ Response to the Project On Government Oversight, October 30, 1997, Enclosure.

¹⁹ Phone conversation with Carol Butler, “Wyden for Senate Campaign,” October 30, 1997.

Cost:

This reform would simply require a minor internal policy change, and notification being sent to PACs regarding this change.

7. FEC Needs Better Tools to Encourage Compliance

The FEC does not have adequate tools to enforce compliance and deter noncompliance of regulations.

Problem:

A significant limitation was created in 1979 when Congress removed the FEC's ability to conduct random audits of committees. Since that time, the FEC can only act "for cause" when a committee's reports indicate violations of the campaign finance laws.²⁰ The 1979 legislation actually prevents the FEC from performing a truly necessary function. Random audits are already performed by the Internal Revenue Service on taxpayers and provide a successful deterrent to tax dodgers. The New York City Campaign Finance Board has found their audits to be a vital tool in its success.

The FEC also lacks the authority to enforce adequately campaign finance laws. As a result, some PACs and candidates are unconcerned about noncompliance and thus often do not meet existing requirements.

Solution:

The authority to conduct random audits is essential in order to provide the FEC with the necessary tools to perform its mission. The strict rules limiting FEC audits as well as the limited time frame in which the FEC may take action must be expanded to allow the FEC the ability to discover errors as well as to enforce existing law.

The FEC should also consider publishing a report, press release and web page detailing PACs and candidate campaigns which have not filed reports or whose reports are missing information. A published list of PACs and campaigns in violation of certain laws (i.e., not reporting "in-kind" contributions to campaign committees and not filing amendments for returned or voided checks) would be a convincing step toward aggressively promoting accurate disclosure. In the past, the FEC has been successful in publishing a list of campaigns which failed to file complete pre-general reports.

²⁰ The Federal Election Commission, Twenty Year Report, April, 1995, p. 10.

The FEC should also create a fee schedule to fine PACs and candidate committees for noncompliance with FEC requirements.

Cost:

While audit power would require significant resources, this would be a prudent investment of taxpayer money. The public list of incomplete filers and fee schedule would require minimal FEC resources.

8. Mandatory Electronic Filing

As of March 2, 1998, approximately 50 candidates and PACs, out of thousands, have utilized the FEC's electronic filing system, whereby committee reports are sent to the FEC by computer.²¹ Not only does the FEC already offer this time and error saving service, but it does so with its own free software program allowing campaign committees to maintain electronic records and generate their reports. If this reform were mandated by Congress, many, if not all, of POGO's reforms could be incorporated into the FEC's electronic filing system.

Problem:

Congress has only agreed to voluntary electronic filing. Thousands of PACs and campaign committees still file paper reports, often handwritten, that make it almost impossible for the FEC to fulfill its mission. This volume of work, compounded by the FEC's financial limitations, causes significant tradeoffs in accuracy. The FEC is not equipped with either the staff or the budget to handle accurately the nearly two million detailed entries made into the FEC's disclosure database. Currently FEC data processing takes nearly 30 days to complete once reports are received from the committees.

Solution:

Congress should require electronic filing for candidates and PACs reporting over a certain level of financial activity. Having a threshold would protect small PACs and candidates with limited resources from undue hardship. The FEC recently found that nearly 50 percent of respondents to its survey stated that they believe electronic filing would give the public easier and increased access to campaign finance information, and 70 percent indicated that it should save them time, after the initial setup. Moreover, nearly 50 percent of all committees already have computers, modems and internet access necessary to file campaign finance information electronically.

²¹ FEC's web site -- <http://election.sdr.com/cgi-bin/dcdev/forms/>

Electronic filing would dramatically increase the accuracy and thoroughness of FEC data. It would also greatly reduce the time it takes committees to file reports and for the FEC to disclose campaign finance information.

Cost:

The FEC already has created software enabling those candidates and PACs reporting over a certain level of financial activity to file their reports electronically. Additional resources may be required to train committees how to use the software and to offer them technical support. However, the decrease in missing and inaccurate data and math errors would result in a reduction of resources being spent on writing candidates and PACs requesting additional information as well as having to check reports manually. This reform would also save the FEC time currently spent on data entry.

9. Streamline Senate Filing

Currently Senate candidates are only required to file their reports with the Senate's Office of Public Records. This process hinders electronic filing because the FEC then only receives Senate candidate filings on microfilm. Unlike House candidates, who file campaign reports directly with the FEC, Senate candidates can only file with the Office of Public Records, which films all reports and sends the film out for processing onto microfilm.

Problem:

Because Senate candidates file with the Senate's Office of Public Records, the FEC cannot include them in its computerized databases in the FEC's public records room. While it is possible to run computer searches for House candidates and PACs, Senate candidates have to be searched the old-fashioned way — on microfilm and various other paper indices that have yet to be assembled into one searchable computerized system.

Solution:

Senate candidates should be required to send all filings directly to the FEC, as is currently required of the House.

Cost:

This reform would streamline the system and reduce costs to both the Senate and the FEC.

10. Streamline Joint Fund-Raisers and Multi-Candidate Committees

Throughout POGO's investigation, problems were created by multi-candidate entities that are set up to accept PAC contributions on behalf of several candidates.

Joint fund-raising events allow candidates to pool money into one account. This money is later used to cover the cost of the fund-raiser, with the balance being split between participating candidates.

For example, in our review of Senator John Warner's (R-VA) contribution receipts, POGO found that Sen. Warner reported the total money raised at joint fund-raisers in his receipts, rather than only his individual share. This practice created large discrepancies between the amount of money Sen. Warner reported and the amount actually received during the 1995-96 election-cycle. Moreover, Sen. Warner's receipts remain uncorrected in the FEC files.

In addition, POGO found that several PACs as well as the FEC attributed nine contributions to Representative Richard Gephardt's (D-MO) 1996 campaign. These contributions were actually issued to the multi-candidate committee which he chairs, the Effective Government Committee, which distributed them to other candidates.²²

Problem:

In the examples of Sen. Warner and Rep. Gephardt, their reported receipts totaled significantly above each of their actual PAC contributions. This dilemma confuses the issue of campaign finance disclosure and falsely portrays Sen. Warner and Rep. Gephardt as accepting more money than they actually received.

Solution:

PACs need to issue separate checks to each candidate involved in joint fund-raisers and multi-candidate committees. This method would also expedite the process in which candidates report these contributions.

Cost:

No additional FEC resources would be required.

²² Ryan, John D., Compliance Director, The Gephardt-in-Congress Committee, Response to the Project On Government Oversight, October 30, 1997, Enclosure.

APPENDIX A:

Lessons Learned from the New York City Campaign Finance Board

The New York City Campaign Finance Board (CFB) was created in 1988 to retrieve lost public confidence in the integrity of New York City elections. The CFB has won national acclaim for reviving what was thought to be a city with “dirty” elections. The cleansing of New York City’s campaign finance process has occurred through various techniques: first, the CFB has worked hard to increase the education of the voting public through the development of disclosure requirements; and second, holding those who run for public office accountable for their elections through a high level of compliance and enforcement.

The CFB collects very detailed data from New York City candidates and provides this information to the public. However, providing this information to the public is only half of the CFB’s job. The information the candidates disclose is checked against all contribution and spending limits and is examined for accuracy. This process is performed by the CFB by auditing all committees to verify total compliance with campaign laws.

Realizing that disclosure, compliance and enforcement would take large amounts of time and financial resources if it weren’t automated, the CFB created computer software to assist both the New York City candidates and the CFB itself. This software maintains campaign data (candidate information, committee information, and bank information), contributor data (names, addresses and employer information) as well as transaction data (receipts, disbursements, and transfers).

This software makes it easier for candidates to comply with CFB requirements. The software created by the CFB actually warns candidates about over-the-limit contributions, missing data and invalid matching claims. Candidates are rewarded with the ability to preempt and correct many problems before their filings are even sent to the CFB. In addition, the software uses standardized names and addresses, performs searches for previously entered data and calculates contribution amounts, which eliminates many math errors.

Not only has the CFB created the software, but it also offers training classes and technical support for those using it. One reason for the CFB’s diligence is the noticeably lower error rate for those using the CFB’s software versus those who are still filing campaign reports by hand. Candidates can avoid unfounded, but potentially embarrassing, questions because the CFB is given accurate and timely campaign information.

Due to the speed and accuracy of CFB software, the agency itself is freed up to pursue genuine enforcement issues. For example, letters requiring additional information from candidates are minimized and the time required to check addresses, employment information and math errors are diminished.

There are many lessons learned from the CFB. **The CFB’s systems of operation save all who participate time, money and the potential for embarrassment because campaign finance information is timely, accurate and accessible.**

APPENDIX B:

FEC Background

In 1975, Congress created the Federal Election Commission (FEC) to administer and enforce the Federal Election Campaign Act (FECA) - the statute that governs the financing of federal elections. The regulation of federal campaigns emanated from a congressional judgment that our representative form of government needed protection from the corrosive influence of unlimited and undisclosed political contributions. The laws were designed to ensure that candidates in federal elections were not - or did not appear to be - beholden to a narrow group of people. Taken together, it was hoped, the laws would sustain and promote citizen confidence and participation in the democratic process.

Guided by this desire to protect the fundamental tenets of democracy, Congress created an independent regulatory agency - the FEC - to disclose campaign finance information; to enforce the limits, prohibitions and other provisions of the election law; and to administer the public funding of Presidential elections. The Commission is made up of six members, appointed by the President and confirmed by the Senate. Each member serves a six-year term; and two seats are subject to appointment every two years. By law, no more than three Commissioners can be members of the same political party, and at least four votes are required for any official Commission action. This structure was created to encourage nonpartisan decisions. The Chairmanship of the Commission rotates among the members each year, with no member serving as Chairman more than once during his or her term.²³

²³ This section was transcribed from the FEC's web site -- <http://www.fec.gov/1996/about.htm>

APPENDIX C:

Candidate	Candidate Receipts	PAC Disbursements	Differential
Wyden, Ron	\$911,826.00	\$1,470,315.00	(\$558,489.00)
Gephardt, Richard A	\$1,104,532.00	\$1,382,475.00	(\$277,943.00)
Warner, John W	\$1,482,176.00	\$1,692,228.00	(\$210,052.00)
Smith, Gordon	\$1,429,387.00	\$1,603,142.00	(\$173,755.00)
Cochran, Thad	\$390,700.00	\$560,775.00	(\$170,075.00)
Brownback, Sam	\$660,279.00	\$824,945.00	(\$164,666.00)
Hutchinson, Tim	\$498,833.00	\$645,282.00	(\$146,449.00)
Domenici, Pete V	\$1,027,910.00	\$1,162,687.00	(\$134,777.00)
McConnell, Mitch	\$1,188,606.00	\$1,306,033.00	(\$117,427.00)
Kind, Ron	\$99,822.00	\$216,897.00	(\$117,075.00)
Inhofe, James M	\$1,021,777.00	\$1,130,737.00	(\$108,960.00)
Smith, Robert C	\$786,105.00	\$892,380.00	(\$106,275.00)
Craig, Larry E	\$934,899.00	\$1,028,977.00	(\$94,078.00)
Helms, Jesse	\$980,127.00	\$1,070,168.00	(\$90,041.00)
Barr, Bob	\$312,399.00	\$390,801.00	(\$78,402.00)
Rangel, Charles B	\$668,670.00	\$745,662.00	(\$76,992.00)
Solomon, Gerald B H	\$427,267.00	\$503,113.00	(\$75,846.00)
Thompson, Fred	\$1,014,294.00	\$1,086,611.00	(\$72,317.00)
Harkin, Tom	\$1,066,804.00	\$1,135,238.00	(\$68,434.00)
Roberts, Pat	\$1,178,113.00	\$1,245,390.00	(\$67,277.00)
Landrieu, Mary L	\$508,576.00	\$571,617.00	(\$63,041.00)
McNulty, Michael R	\$185,393.00	\$246,639.00	(\$61,246.00)
Chabot, Steve	\$362,798.00	\$420,913.00	(\$58,115.00)
Campbell, Tom	\$533,436.00	\$584,896.00	(\$51,460.00)
Cleland, Max	\$683,145.00	\$734,521.00	(\$51,376.00)
Gonzalez, Henry B	\$42,400.00	\$93,125.00	(\$50,725.00)
Hagel, Chuck	\$460,213.00	\$508,276.00	(\$48,063.00)
Wellstone, Paul	\$569,883.00	\$617,590.00	(\$47,707.00)
Durbin, Richard J	\$1,162,096.00	\$1,207,506.00	(\$45,410.00)
Weller, Jerry	\$385,301.00	\$429,150.00	(\$43,849.00)
Shimkus, John M	\$205,139.00	\$247,522.00	(\$42,383.00)
Gramm, Phil	\$1,086,923.00	\$1,127,459.00	(\$40,536.00)
Evans, Lane	\$312,819.00	\$352,428.00	(\$39,609.00)
Hinojosa, Ruben	\$109,450.00	\$148,500.00	(\$39,050.00)
Bass, Charles	\$252,149.00	\$291,081.00	(\$38,932.00)
Bilbray, Brian P	\$485,747.00	\$503,667.00	(\$37,920.00)
Thurmond, Strom	\$761,060.00	\$798,849.00	(\$37,789.00)
Clay, William L	\$178,825.00	\$216,590.00	(\$37,765.00)
Riggs, Frank	\$502,310.00	\$538,535.00	(\$36,225.00)
Aderholt, Robert	\$176,566.00	\$211,041.00	(\$34,475.00)
Tierney, John F	\$257,235.00	\$291,050.00	(\$33,815.00)
DeFazio, Peter A	\$143,462.00	\$175,750.00	(\$32,288.00)
Moran, James P Jr	\$249,792.00	\$281,420.00	(\$31,628.00)
McKinney, Cynthia A	\$354,061.00	\$384,648.00	(\$30,587.00)
Hulshof, Kenny	\$106,697.00	\$136,500.00	(\$29,803.00)
Strickland, Ted	\$292,811.00	\$322,030.00	(\$29,219.00)
LaTourette, Steven C	\$339,712.00	\$368,526.00	(\$28,814.00)

Candidate	Candidate Receipts	PAC Disbursements	Differential
Emerson, Jo Ann	\$437,592.00	\$465,995.00	(\$28,403.00)
Capps, Walter H	\$232,237.00	\$258,925.00	(\$26,688.00)
Lampson, Nick	\$669,786.00	\$695,025.00	(\$25,239.00)
Towns, Edolphus	\$239,395.00	\$264,260.00	(\$24,865.00)
Snowbarger, Vince	\$184,434.00	\$209,000.00	(\$24,566.00)
Metcalf, Jack	\$342,659.00	\$366,961.00	(\$24,302.00)
Archer, Bill	\$965.00	\$25,125.00	(\$24,160.00)
Biden, Joseph R Jr	\$0.00	\$24,102.00	(\$24,102.00)
Davis, Danny K	\$143,100.00	\$166,800.00	(\$23,700.00)
Mollohan, Alan B	\$140,650.00	\$163,850.00	(\$23,200.00)
Toricelli, Robert G	\$993,690.00	\$1,016,608.00	(\$22,918.00)
Cramer, Robert E "Bu	\$420,570.00	\$442,870.00	(\$22,300.00)
English, Phil	\$655,667.00	\$677,965.00	(\$22,298.00)
Delahunt, William D	\$223,706.00	\$245,150.00	(\$21,444.00)
Walsh, James T	\$267,125.00	\$288,136.00	(\$21,011.00)
Rush, Bobby L	\$145,562.00	\$166,400.00	(\$20,838.00)
Brown, George E Jr	\$325,375.00	\$346,025.00	(\$20,650.00)
Nethercutt, George	\$359,643.00	\$379,458.00	(\$19,815.00)
Kerry, John	\$27,628.00	\$47,059.00	(\$19,431.00)
Stevens, Ted	\$1,203,128.00	\$1,222,305.69	(\$19,177.00)
King, Peter T	\$339,560.00	\$358,730.00	(\$19,170.00)
Pease, Ed	\$186,050.00	\$204,475.00	(\$18,425.00)
Johnson, Jay	\$151,448.00	\$169,550.00	(\$18,102.00)
Reed, Jack	\$1,028,699.00	\$1,046,571.00	(\$17,872.00)
Chambliss, Saxby	\$390,496.00	\$408,024.00	(\$17,528.00)
McDade, Joseph M	\$271,225.00	\$288,749.00	(\$17,524.00)
Smith, Linda	\$20,398.00	\$37,375.00	(\$16,977.00)
Cook, Merrill	\$109,694.00	\$126,500.00	(\$16,806.00)
Moakley, Joe	\$338,548.00	\$355,072.00	(\$16,524.00)
Gejdenson, Sam	\$402,200.00	\$417,017.00	(\$14,817.00)
Dunn, Jennifer	\$465,582.00	\$479,518.00	(\$13,936.00)
Allen, Tom	\$215,283.00	\$229,100.00	(\$13,817.00)
Ney, Bob	\$523,699.00	\$537,483.00	(\$13,784.00)
Fattah, Chaka	\$135,215.00	\$148,700.00	(\$13,485.00)
Rothman, Steven R	\$254,600.00	\$267,600.00	(\$13,000.00)
Levin, Sander M	\$566,482.00	\$579,390.00	(\$12,908.00)
Owens, Major R	\$119,550.00	\$132,100.00	(\$12,550.00)
Allard, Wayne	\$1,051,036.00	\$1,063,336.00	(\$12,300.00)
Lewis, John	\$202,556.00	\$214,325.00	(\$11,769.00)
Furse, Elizabeth	\$435,357.00	\$447,124.00	(\$11,767.00)
Cannon, Chris	\$89,979.00	\$101,658.00	(\$11,679.00)
Callahan, Sonny	\$173,455.00	\$185,124.00	(\$11,669.00)
Slaughter, Louise M	\$392,220.00	\$403,600.00	(\$11,380.00)
Riley, Bob	\$271,862.00	\$283,127.00	(\$11,265.00)
Quinn, Jack	\$288,271.00	\$298,745.00	(\$10,474.00)
Armey, Dick	\$586,850.00	\$597,245.00	(\$10,395.00)
Neumann, Mark W	\$311,371.00	\$321,464.00	(\$10,093.00)

Candidate	Candidate Receipts	PAC Disbursements	Differential
Brown, Corrine	\$238,100.00	\$248,100.00	(\$10,000.00)
Sawyer, Tom	\$308,075.00	\$317,725.00	(\$9,650.00)
Boehner, John A	\$548,212.00	\$557,547.00	(\$9,335.00)
Schaefer, Dan	\$542,825.00	\$552,137.00	(\$9,312.00)
Everett, Terry	\$176,006.00	\$185,220.00	(\$9,214.00)
Northup, Anne	\$287,618.00	\$296,802.00	(\$9,184.00)
Kilpatrick, Carolyn Ch	\$69,300.00	\$78,400.00	(\$9,100.00)
Payne, Donald M	\$220,129.00	\$228,617.00	(\$8,488.00)
Mascara, Frank R	\$340,803.00	\$349,075.00	(\$8,272.00)
Tauzin, W J "Billy"	\$544,150.00	\$552,371.00	(\$8,221.00)
Thune, John	\$188,637.00	\$196,737.00	(\$8,100.00)
Nadler, Jerrold	\$240,735.00	\$248,810.00	(\$8,075.00)
Johnson, Tim	\$861,990.00	\$869,797.00	(\$7,807.00)
Hilleary, Van	\$14,571.00	\$22,371.00	(\$7,800.00)
Shays, Christopher	\$7,550.00	\$15,200.00	(\$7,650.00)
DeGette, Diana	\$210,963.00	\$218,613.00	(\$7,650.00)
Franks, Bob	\$284,359.00	\$292,004.00	(\$7,645.00)
Kennedy, Joseph P II	\$292,325.00	\$299,800.00	(\$7,475.00)
Baker, Richard H	\$276,934.00	\$284,343.00	(\$7,409.00)
Johnson, Nancy	\$424,431.00	\$431,810.00	(\$7,379.00)
Latham, Tom	\$295,037.00	\$302,259.00	(\$7,222.00)
Turner, Jim	\$357,512.00	\$364,647.00	(\$7,135.00)
Wicker, Roger	\$267,997.00	\$274,999.00	(\$7,002.00)
Leach, Jim	\$0.00	\$7,000.00	(\$7,000.00)
Pickering, Charles "C"	\$438,450.00	\$445,281.00	(\$6,831.00)
Lewis, Ron	\$212,964.00	\$219,763.00	(\$6,799.00)
Klug, Scott L	\$420,577.00	\$427,134.00	(\$6,557.00)
Enzi, Michael B	\$479,594.00	\$486,053.00	(\$6,459.00)
Gingrich, Newt	\$1,081,214.00	\$1,087,631.00	(\$6,417.00)
Rockefeller, John D I	\$993,954.00	\$1,000,319.00	(\$6,365.00)
Matsui, Robert T	\$405,373.00	\$411,696.00	(\$6,323.00)
Sununu, John E	\$152,552.00	\$158,850.00	(\$6,298.00)
Dreier, David	\$301,900.00	\$308,124.00	(\$6,224.00)
Collins, Susan M	\$613,924.00	\$620,127.00	(\$6,203.00)
Dooley, Cal	\$319,600.00	\$325,679.00	(\$6,079.00)
Snyder, Victor F	\$221,755.00	\$227,750.00	(\$5,995.00)
Miller, George	\$148,800.00	\$154,750.00	(\$5,950.00)
Hastings, Alcee L	\$116,350.00	\$122,300.00	(\$5,950.00)
Petri, Tom	\$284,426.00	\$290,046.00	(\$5,620.00)
Sensenbrenner, F Ja	\$139,252.00	\$144,780.00	(\$5,528.00)
Rahall, Nick J II	\$241,556.00	\$247,050.00	(\$5,494.00)
Levin, Carl	\$910,262.00	\$915,421.00	(\$5,159.00)
Clement, Bob	\$260,957.00	\$265,977.00	(\$5,020.00)
Hastert, Dennis	\$550,187.00	\$555,201.00	(\$5,014.00)
Portman, Rob	\$0.00	\$4,985.00	(\$4,985.00)
Blumenauer, Earl	\$154,401.00	\$159,382.00	(\$4,981.00)
Ryun, Jim	\$125,682.00	\$130,475.00	(\$4,793.00)

Candidate	Candidate Receipts	PAC Disbursements	Differential
Ramstad, Jim	\$280,027.00	\$284,681.00	(\$4,654.00)
McDermott, Jim	\$120,331.00	\$124,981.00	(\$4,650.00)
McHale, Paul	\$218,675.00	\$223,225.00	(\$4,550.00)
Barrett, Bill	\$143,504.00	\$148,026.00	(\$4,522.00)
Skeen, Joe	\$251,350.00	\$255,752.00	(\$4,402.00)
Dickey, Jay	\$0.00	\$4,360.00	(\$4,360.00)
Hastings, Richard "Do	\$304,880.00	\$309,240.00	(\$4,360.00)
Kelly, Sue W	\$417,755.00	\$422,086.00	(\$4,331.00)
Tiaht, Todd	\$313,255.00	\$317,525.00	(\$4,270.00)
Becerra, Xavier	\$143,700.00	\$147,950.00	(\$4,250.00)
Cunningham, Randy "	\$314,705.00	\$318,857.00	(\$4,152.00)
Reyes, Silvestre	\$212,715.00	\$216,850.00	(\$4,135.00)
Brown, Sherrod	\$504,840.00	\$508,849.00	(\$4,009.00)
Traficant, James A Jr	\$113,395.00	\$117,385.00	(\$3,990.00)
DeLay, Tom	\$1,059,024.00	\$1,062,978.00	(\$3,954.00)
Rogers, Harold	\$195,978.00	\$199,903.00	(\$3,925.00)
Cardin, Benjamin L	\$302,907.00	\$306,822.00	(\$3,915.00)
Harman, Jane	\$508,184.00	\$511,912.00	(\$3,748.00)
Goode, Virgil H Jr	\$227,276.00	\$230,810.00	(\$3,534.00)
Kucinich, Dennis	\$301,693.00	\$305,137.00	(\$3,444.00)
Weldon, Curt	\$232,850.00	\$236,250.00	(\$3,400.00)
Neal, Richard E	\$254,975.00	\$258,250.00	(\$3,275.00)
Camp, Dave	\$297,808.00	\$301,023.00	(\$3,215.00)
Foglietta, Thomas M	\$224,224.00	\$227,424.00	(\$3,200.00)
Jenkins, Bill	\$104,273.00	\$107,446.00	(\$3,173.00)
Goodling, Bill	\$0.00	\$3,000.00	(\$3,000.00)
Frelinghuysen, Rodne	\$190,991.00	\$193,923.00	(\$2,932.00)
Hutchinson, Asa	\$109,973.00	\$112,777.00	(\$2,804.00)
Oberstar, James L	\$366,296.00	\$369,100.00	(\$2,804.00)
Jones, Walter B Jr	\$252,547.00	\$255,268.00	(\$2,721.00)
Oxley, Michael G	\$428,885.00	\$431,535.00	(\$2,650.00)
Miller, Dan	\$74,980.00	\$77,627.00	(\$2,647.00)
Hill, Rick	\$247,336.00	\$249,800.00	(\$2,464.00)
McIntyre, Mike	\$132,760.00	\$135,119.00	(\$2,359.00)
Richardson, Bill	\$222,971.00	\$225,327.00	(\$2,356.00)
Pombo, Richard W	\$212,575.00	\$214,925.00	(\$2,350.00)
Fox, Jon D	\$517,087.00	\$519,296.00	(\$2,209.00)
Hostettler, John	\$33,795.00	\$35,984.00	(\$2,189.00)
Flake, Floyd H	\$106,450.00	\$108,540.00	(\$2,090.00)
Horn, Steve	\$0.00	\$2,050.00	(\$2,050.00)
Pascrell, William J Jr	\$232,350.00	\$234,300.00	(\$1,950.00)
Weldon, Dave	\$322,260.00	\$324,186.00	(\$1,926.00)
Torres, Esteban E	\$74,625.00	\$76,500.00	(\$1,875.00)
Ros-Lehtinen, Ileana	\$134,251.00	\$136,032.00	(\$1,781.00)
Jackson, Jesse Jr	\$233,175.00	\$234,855.00	(\$1,680.00)
Hoekstra, Peter	\$0.00	\$1,642.00	(\$1,642.00)
Kaptur, Marcy	\$218,860.00	\$220,454.00	(\$1,594.00)

Candidate	Candidate Receipts	PAC Disbursements	Differential
Lucas, Frank D	\$212,205.00	\$213,784.00	(\$1,579.00)
Meehan, Martin T	\$0.00	\$1,550.00	(\$1,550.00)
Gordon, Bart	\$767,370.00	\$768,900.00	(\$1,530.00)
Woolsey, Lynn	\$267,975.00	\$269,475.00	(\$1,500.00)
Doolittle, John T	\$221,400.00	\$222,650.00	(\$1,250.00)
Engel, Eliot L	\$206,516.00	\$207,725.00	(\$1,209.00)
Herger, Wally	\$341,801.00	\$342,945.00	(\$1,144.00)
Berman, Howard L	\$161,890.00	\$163,000.00	(\$1,110.00)
Markey, Edward J	\$500.00	\$1,550.00	(\$1,050.00)
DeLauro, Rosa	\$243,055.00	\$244,100.00	(\$1,045.00)
Fowler, Tillie	\$133,546.00	\$134,546.00	(\$1,000.00)
Hobson, David L	\$306,848.00	\$307,661.00	(\$813.00)
Tanner, John	\$253,683.00	\$254,427.00	(\$744.00)
Conyers, John Jr	\$162,615.00	\$163,350.00	(\$735.00)
Goss, Porter J	\$27,750.00	\$28,418.00	(\$668.00)
Goodlatte, Robert W	\$217,305.00	\$217,950.00	(\$645.00)
Frank, Barney	\$138,128.00	\$138,765.00	(\$637.00)
Gilchrest, Wayne T	\$2,438.00	\$3,053.00	(\$615.00)
Greenwood, James C	\$1,467.00	\$2,037.00	(\$570.00)
Smith, Nick	\$0.00	\$480.00	(\$480.00)
Roybal-Allard, Lucille	\$81,550.00	\$81,950.00	(\$400.00)
Saxton, H James	\$297,291.00	\$297,640.00	(\$349.00)
McCrery, Jim	\$445,522.00	\$445,863.00	(\$341.00)
Clyburn, James E	\$175,850.00	\$176,104.00	(\$254.00)
Wolf, Frank R	\$197,205.00	\$197,265.00	(\$60.00)
Gekas, George W	\$78,200.00	\$78,250.00	(\$50.00)
Martinez, Matthew G	\$67,200.00	\$67,250.00	(\$50.00)
Poshard, Glenn	\$0.00	\$0.00	\$0.00
Pelosi, Nancy	\$152,700.00	\$152,700.00	\$0.00
McCarthy, Karen	\$277,050.00	\$277,050.00	\$0.00
Ackerman, Gary L	\$359,500.00	\$359,500.00	\$0.00
Davis, Thomas M III	\$454,782.00	\$454,723.00	\$59.00
Norwood, Charlie	\$668,088.00	\$667,957.00	\$131.00
Forbes, Michael P	\$324,946.00	\$324,775.00	\$171.00
Parker, Mike	\$183,850.00	\$183,566.00	\$284.00
Kennedy, Patrick J	\$326,285.00	\$325,972.00	\$313.00
Lipinski, William O	\$259,228.00	\$258,875.00	\$353.00
Dixon, Julian C	\$65,250.00	\$64,850.00	\$400.00
Stokes, Louis	\$123,000.00	\$122,600.00	\$400.00
Inglis, Bob	\$1,500.00	\$1,080.00	\$420.00
Kolbe, Jim	\$165,775.00	\$165,345.00	\$430.00
Thompson, Bennie	\$221,325.00	\$220,850.00	\$475.00
Millender-McDonald,	\$94,500.00	\$94,000.00	\$500.00
Bryant, Ed	\$300,525.00	\$300,017.00	\$508.00
Buyer, Steve	\$158,801.00	\$158,210.00	\$591.00
Graham, Lindsey	\$225,343.00	\$224,599.00	\$744.00
Wynn, Albert R	\$191,040.00	\$190,285.00	\$755.00

**Candidates with
a Zero Balance**

Candidate	Candidate Receipts	PAC Disbursements	Differential
Kildee, Dale E	\$448,561.00	\$447,781.00	\$780.00
Bonior, David E	\$879,546.00	\$878,673.00	\$873.00
McCollum, Bill	\$426,412.00	\$425,510.00	\$902.00
Radanovich, George	\$243,150.00	\$242,203.00	\$947.00
Frost, Martin	\$1,126,845.00	\$1,125,875.00	\$970.00
Gallegly, Elton	\$121,889.00	\$120,918.00	\$971.00
Hefley, Joel	\$143,055.00	\$142,000.00	\$1,055.00
Ehlers, Vernon J	\$105,915.00	\$104,850.00	\$1,065.00
Hilliard, Earl F	\$175,100.00	\$174,000.00	\$1,100.00
Lazio, Rick A	\$472,628.00	\$471,495.00	\$1,133.00
Yates, Sidney R	\$19,200.00	\$18,000.00	\$1,200.00
Serrano, Jose E	\$59,575.00	\$58,325.00	\$1,250.00
Vento, Bruce F	\$365,168.00	\$363,904.00	\$1,264.00
Kennelly, Barbara B	\$343,600.00	\$342,335.00	\$1,265.00
McKeon, Howard P "	\$169,450.00	\$168,050.00	\$1,400.00
Stump, Bob	\$124,016.00	\$122,600.00	\$1,416.00
Hansen, James V	\$155,250.00	\$153,825.00	\$1,425.00
Christensen, Jon	\$634,452.00	\$633,005.00	\$1,447.00
Lowey, Nita M	\$227,967.00	\$226,520.00	\$1,447.00
Pastor, Ed	\$242,425.00	\$240,975.00	\$1,450.00
Berry, Marion	\$266,235.00	\$264,772.00	\$1,463.00
Abercrombie, Neil	\$437,034.00	\$435,550.00	\$1,484.00
Shadegg, John	\$185,302.00	\$183,815.00	\$1,487.00
Pickett, Owen B	\$141,250.00	\$139,750.00	\$1,500.00
Houghton, Amo	\$323,878.00	\$322,369.00	\$1,509.00
Roemer, Tim	\$300,669.00	\$299,148.00	\$1,521.00
Smith, Lamar	\$120,475.00	\$118,944.00	\$1,531.00
McGovern, Jim	\$282,292.00	\$280,704.00	\$1,588.00
Bilirakis, Michael	\$375,419.00	\$373,778.00	\$1,641.00
Royce, Ed	\$247,840.00	\$246,000.00	\$1,840.00
Castle, Michael N	\$199,880.00	\$198,025.00	\$1,855.00
Green, Gene	\$395,233.00	\$393,375.00	\$1,858.00
Sanford, Mark	\$8,000.00	\$6,115.00	\$1,885.00
Regula, Ralph	\$0.00	(\$2,000.00)	\$2,000.00
Watt, Melvin	\$102,653.00	\$100,650.00	\$2,003.00
Wamp, Zach	\$12,663.00	\$10,634.00	\$2,029.00
Farr, Sam	\$297,022.00	\$294,901.00	\$2,121.00
Waters, Maxine	\$60,900.00	\$58,695.00	\$2,205.00
Lantos, Tom	\$37,590.00	\$35,350.00	\$2,240.00
Hyde, Henry J	\$321,666.00	\$319,376.00	\$2,290.00
Manton, Thomas J	\$291,472.00	\$289,100.00	\$2,372.00
Scott, Robert C	\$140,200.00	\$137,700.00	\$2,500.00
Obey, David R	\$439,848.00	\$437,258.00	\$2,590.00
Smith, Christopher H	\$106,687.00	\$104,090.00	\$2,597.00
Gutierrez, Luis V	\$163,925.00	\$161,325.00	\$2,600.00
Gibbons, Jim	\$206,626.00	\$203,900.00	\$2,726.00
Klink, Ron	\$319,575.00	\$316,825.00	\$2,750.00

Candidate	Candidate Receipts	PAC Disbursements	Differential
Bartlett, Roscoe G	\$126,791.00	\$124,022.00	\$2,769.00
Bunning, Jim	\$398,157.00	\$395,376.00	\$2,781.00
Cox, Christopher	\$399,665.00	\$396,879.00	\$2,786.00
White, Rick	\$743,976.00	\$741,157.00	\$2,819.00
Fawell, Harris W	\$192,107.00	\$189,278.00	\$2,829.00
Molinari, Susan	\$497,122.00	\$494,203.00	\$2,919.00
Mink, Patsy T	\$132,150.00	\$129,194.00	\$2,956.00
Schiff, Steven H	\$152,235.00	\$149,250.00	\$2,985.00
Ballenger, Cass	\$159,248.00	\$156,200.00	\$3,048.00
Meek, Carrie P	\$143,400.00	\$140,250.00	\$3,150.00
Sherman, Brad	\$228,458.00	\$225,275.00	\$3,181.00
Roukema, Marge	\$304,076.00	\$300,876.00	\$3,200.00
Pappas, Mike	\$189,932.00	\$186,655.00	\$3,277.00
LaHood, Ray	\$299,436.00	\$296,150.00	\$3,286.00
Schumer, Charles E	\$308,278.00	\$304,975.00	\$3,303.00
Combest, Larry	\$229,630.00	\$226,247.00	\$3,383.00
Packard, Ron	\$235,350.00	\$231,850.00	\$3,500.00
Stearns, Cliff	\$328,176.00	\$324,650.00	\$3,526.00
Canady, Charles T	\$120,465.00	\$116,850.00	\$3,615.00
Wise, Bob	\$240,750.00	\$237,000.00	\$3,750.00
Hefner, W G "Bill"	\$401,901.00	\$398,101.00	\$3,800.00
Cubin, Barbara	\$317,254.00	\$313,433.00	\$3,821.00
Rohrabacher, Dana	\$88,443.00	\$84,600.00	\$3,843.00
Davis, Jim	\$260,625.00	\$256,747.00	\$3,878.00
Skaggs, David E	\$310,788.00	\$306,881.00	\$3,907.00
Bateman, Herbert H	\$223,733.00	\$219,775.00	\$3,958.00
Etheridge, Bobby R	\$242,459.00	\$238,469.00	\$3,990.00
Gilman, Benjamin A	\$234,655.00	\$230,620.00	\$4,035.00
Lofgren, Zoe	\$110,953.00	\$106,853.00	\$4,100.00
Baucus, Max	\$1,357,393.00	\$1,353,284.00	\$4,109.00
Kasich, John R	\$489,200.00	\$485,061.00	\$4,139.00
Johnson, Eddie Berni	\$233,042.00	\$228,825.00	\$4,217.00
Holden, Tim	\$372,668.00	\$368,279.00	\$4,389.00
McHugh, John M	\$187,316.00	\$182,875.00	\$4,441.00
Whitfield, Edward	\$543,502.00	\$539,059.00	\$4,443.00
Spence, Floyd D	\$264,150.00	\$259,650.00	\$4,500.00
Dellums, Ronald V	\$122,865.00	\$118,325.00	\$4,540.00
Shuster, Bud	\$544,431.00	\$539,882.00	\$4,549.00
Danner, Pat	\$327,228.00	\$322,650.00	\$4,578.00
Edwards, Chet	\$415,979.00	\$411,362.00	\$4,617.00
Pallone, Frank Jr	\$481,981.00	\$477,296.00	\$4,685.00
Ewing, Thomas W	\$344,471.00	\$339,779.00	\$4,692.00
Young, C W Bill	\$181,225.00	\$176,525.00	\$4,700.00
Visclosky, Peter J	\$214,100.00	\$209,365.00	\$4,735.00
Baldacci, John	\$325,316.00	\$320,577.00	\$4,739.00
Costello, Jerry F	\$162,640.00	\$157,900.00	\$4,740.00
Sessions, Jeff	\$965,275.00	\$960,525.00	\$4,750.00

Candidate	Candidate Receipts	PAC Disbursements	Differential
Knollenberg, Joe	\$172,820.00	\$168,025.00	\$4,795.00
Wexler, Robert	\$307,100.00	\$302,300.00	\$4,800.00
McInnis, Scott	\$226,670.00	\$221,842.00	\$4,828.00
Barcia, James A	\$136,389.00	\$131,470.00	\$4,919.00
Foley, Mark	\$249,016.00	\$244,076.00	\$4,940.00
Ortiz, Solomon P	\$147,850.00	\$142,900.00	\$4,950.00
LaFalce, John J	\$287,702.00	\$282,750.00	\$4,952.00
Istook, Ernest Jim Jr	\$132,670.00	\$127,650.00	\$5,020.00
Diaz-Balart, Lincoln	\$179,250.00	\$174,186.00	\$5,064.00
Gillmor, Paul E	\$262,083.00	\$257,014.00	\$5,069.00
Boehlert, Sherwood	\$318,395.00	\$313,312.00	\$5,083.00
Smith, Adam	\$357,345.00	\$352,251.00	\$5,094.00
Hall, Tony P	\$229,060.00	\$223,900.00	\$5,160.00
Collins, Mac	\$290,049.00	\$284,846.00	\$5,203.00
Porter, John Edward	\$258,751.00	\$253,513.00	\$5,238.00
Jackson-Lee, Sheila	\$287,510.00	\$282,235.00	\$5,275.00
Hooley, Darlene	\$279,336.00	\$274,016.00	\$5,320.00
Luther, William P "Bill"	\$439,402.00	\$434,047.00	\$5,355.00
Taylor, Charles H	\$169,390.00	\$163,964.00	\$5,426.00
Livingston, Robert L	\$637,651.00	\$632,198.00	\$5,453.00
Bereuter, Doug	\$272,591.00	\$267,118.00	\$5,473.00
Thomas, Bill	\$645,655.00	\$640,180.00	\$5,475.00
Burton, Dan	\$252,602.00	\$247,004.00	\$5,598.00
Condit, Gary A	\$334,271.00	\$328,590.00	\$5,681.00
Johnson, Sam	\$317,001.00	\$311,310.00	\$5,691.00
Nussle, Jim	\$373,183.00	\$367,490.00	\$5,693.00
Velazquez, Nydia M	\$108,239.00	\$102,475.00	\$5,764.00
Manzullo, Donald	\$178,166.00	\$172,308.00	\$5,858.00
Chenoweth, Helen	\$376,471.00	\$370,422.00	\$6,049.00
Boswell, Leonard L	\$293,364.00	\$287,283.00	\$6,081.00
Boucher, Rick	\$412,008.00	\$405,890.00	\$6,118.00
Scarborough, Joe	\$180,768.00	\$174,650.00	\$6,118.00
Andrews, Robert E	\$304,371.00	\$298,244.00	\$6,127.00
Salmon, Matt	\$223,137.00	\$216,885.00	\$6,252.00
Sisisky, Norman	\$156,478.00	\$150,028.00	\$6,450.00
Sanchez, Loretta	\$253,939.00	\$247,349.00	\$6,590.00
Rogan, James E	\$311,280.00	\$304,674.00	\$6,606.00
Mica, John L	\$233,112.00	\$226,430.00	\$6,682.00
Thornberry, William M	\$168,273.00	\$161,464.00	\$6,809.00
Stark, Pete	\$160,508.00	\$153,625.00	\$6,883.00
Smith, Bob	\$280,814.00	\$273,752.00	\$7,062.00
Dicks, Norm	\$288,600.00	\$281,450.00	\$7,150.00
Bonilla, Henry	\$341,576.00	\$334,250.00	\$7,326.00
Hall, Ralph M	\$386,326.00	\$378,832.00	\$7,494.00
Carson, Julia	\$202,265.00	\$194,740.00	\$7,525.00
Crapo, Michael D	\$415,525.00	\$407,965.00	\$7,560.00
Spratt, John M Jr	\$433,990.00	\$426,370.00	\$7,620.00

Candidate	Candidate Receipts	PAC Disbursements	Differential
Cooksey, John	\$157,943.00	\$150,250.00	\$7,693.00
Pomeroy, Earl	\$614,531.00	\$606,764.00	\$7,767.00
Blunt, Roy	\$221,267.00	\$213,475.00	\$7,792.00
Minge, David	\$354,419.00	\$346,624.00	\$7,795.00
Clayton, Eva	\$130,292.00	\$122,220.00	\$8,072.00
Kim, Jay C	\$115,650.00	\$107,561.00	\$8,089.00
Olver, John W	\$329,863.00	\$321,600.00	\$8,263.00
Calvert, Ken	\$255,459.00	\$246,999.00	\$8,460.00
Duncan, John J "Jim"	\$230,715.00	\$222,047.00	\$8,668.00
Waxman, Henry A	\$236,750.00	\$227,900.00	\$8,850.00
Burr, Richard M	\$248,187.00	\$239,315.00	\$8,872.00
Borski, Robert A	\$231,140.00	\$222,250.00	\$8,890.00
Paxon, Bill	\$672,628.00	\$663,670.00	\$8,958.00
Eshoo, Anna G	\$246,315.00	\$237,186.00	\$9,129.00
Crane, Philip M	\$461,619.00	\$452,476.00	\$9,143.00
John, Chris	\$126,350.00	\$117,200.00	\$9,150.00
Paul, Ron	\$151,708.00	\$142,445.00	\$9,263.00
Jefferson, William J	\$181,900.00	\$172,450.00	\$9,450.00
Kleccka, Gerald D	\$526,288.00	\$516,707.00	\$9,581.00
Ehrlich, Robert Jr	\$348,590.00	\$338,947.00	\$9,643.00
Souder, Mark E	\$146,037.00	\$136,235.00	\$9,802.00
Shaw, E Clay Jr	\$437,203.00	\$427,124.00	\$10,079.00
Rivers, Lynn	\$400,729.00	\$390,440.00	\$10,289.00
Menendez, Robert	\$252,401.00	\$242,100.00	\$10,301.00
Talent, James M	\$283,828.00	\$273,400.00	\$10,428.00
McCarthy, Carolyn	\$278,078.00	\$267,550.00	\$10,528.00
Doyle, Mike	\$293,000.00	\$282,350.00	\$10,650.00
Price, David E	\$326,592.00	\$315,809.00	\$10,783.00
Bono, Sonny	\$247,361.00	\$236,450.00	\$10,911.00
Kanjorski, Paul E	\$207,836.00	\$196,900.00	\$10,936.00
Schaffer, Bob	\$170,334.00	\$159,200.00	\$11,134.00
Sessions, Pete	\$336,857.00	\$325,701.00	\$11,156.00
Maloney, Carolyn B	\$276,038.00	\$264,847.00	\$11,191.00
Barton, Joe L	\$640,380.00	\$629,084.00	\$11,296.00
Stenholm, Charles W	\$495,686.00	\$484,108.00	\$11,578.00
Hinchey, Maurice D	\$459,050.00	\$447,401.00	\$11,649.00
Bliley, Thomas J Jr	\$703,022.00	\$691,312.00	\$11,710.00
Bishop, Sanford D Jr	\$373,224.00	\$361,462.00	\$11,762.00
Lewis, Jerry	\$413,400.00	\$401,583.00	\$11,817.00
Taylor, Gene	\$208,879.00	\$196,750.00	\$12,129.00
Sabo, Martin Olav	\$251,632.00	\$239,371.00	\$12,261.00
Filner, Bob	\$512,355.00	\$500,057.00	\$12,298.00
Deutsch, Peter	\$457,739.00	\$445,301.00	\$12,438.00
Tejeda, Frank	\$170,200.00	\$157,750.00	\$12,450.00
Morella, Constance A	\$205,816.00	\$193,132.00	\$12,684.00
Upton, Fred	\$264,277.00	\$251,593.00	\$12,684.00
Maloney, James	\$281,502.00	\$268,620.00	\$12,882.00

Candidate	Candidate Receipts	PAC Disbursements	Differential
Hamilton, Lee H	\$438,153.00	\$425,225.00	\$12,928.00
Hoyer, Steny H	\$709,640.00	\$696,661.00	\$12,979.00
Sanders, Bernard	\$227,438.00	\$214,350.00	\$13,088.00
LoBiondo, Frank A	\$251,361.00	\$238,250.00	\$13,111.00
Doggett, Lloyd	\$241,925.00	\$228,625.00	\$13,300.00
Hunter, Duncan	\$276,759.00	\$263,451.00	\$13,308.00
Barrett, Thomas M	\$162,370.00	\$149,000.00	\$13,370.00
Weygand, Robert A	\$363,300.00	\$349,925.00	\$13,375.00
Young, Don	\$599,261.00	\$585,793.00	\$13,468.00
Bentsen, Ken	\$1,035,588.00	\$1,021,541.00	\$14,047.00
Gutknecht, Gil	\$334,917.00	\$320,644.00	\$14,273.00
Fazio, Vic	\$1,363,328.00	\$1,348,856.00	\$14,472.00
Watts, J C	\$454,642.00	\$440,002.00	\$14,640.00
Deal, Nathan	\$383,996.00	\$369,036.00	\$14,960.00
Moran, Jerry	\$127,428.00	\$112,450.00	\$14,978.00
Murtha, John P	\$435,250.00	\$420,063.00	\$15,187.00
Feinstein, Dianne	\$50,275.00	\$34,525.00	\$15,750.00
Bachus, Spencer	\$191,426.00	\$175,250.00	\$16,176.00
Watkins, Wes	\$349,696.00	\$332,970.00	\$16,726.00
Linder, John	\$402,527.00	\$385,356.00	\$17,171.00
Largent, Steve	\$174,431.00	\$156,896.00	\$17,535.00
Sandlin, Max	\$301,650.00	\$284,100.00	\$17,550.00
McIntosh, David M	\$490,523.00	\$472,412.00	\$18,111.00
Stabenow, Debbie	\$404,877.00	\$386,213.00	\$18,664.00
Myrick, Sue	\$252,861.00	\$234,002.00	\$18,859.00
Cummlings, Elijah E	\$313,302.00	\$293,937.00	\$19,365.00
Hayworth, J D	\$611,958.00	\$592,539.00	\$19,419.00
Tauscher, Ellen	\$206,534.00	\$186,346.00	\$20,188.00
Ford, Harold E Jr	\$176,850.00	\$156,450.00	\$20,400.00
Stupak, Bart	\$371,122.00	\$350,044.00	\$21,078.00
Skelton, Ike	\$387,170.00	\$364,972.00	\$22,198.00
Boyd, Allen Jr	\$405,201.00	\$382,700.00	\$22,501.00
Brady, Kevin	\$524,108.00	\$500,565.00	\$23,543.00
Baesler, Scotty	\$329,962.00	\$306,250.00	\$23,712.00
Dingell, John D	\$902,342.00	\$878,002.00	\$24,340.00
Peterson, John E	\$273,067.00	\$247,280.00	\$25,787.00
Thurman, Karen L	\$423,070.00	\$397,170.00	\$25,900.00
Coburn, Tom	\$653,675.00	\$627,369.00	\$26,306.00
Coyne, William J	\$397,328.00	\$370,495.00	\$26,833.00
Coble, Howard	\$258,863.00	\$231,979.00	\$26,884.00
Ganske, Greg	\$713,968.00	\$686,674.00	\$27,294.00
Pryce, Deborah	\$248,320.00	\$219,372.00	\$28,948.00
Granger, Kay	\$322,754.00	\$292,300.00	\$30,454.00
Pitts, Joseph R	\$214,773.00	\$184,125.00	\$30,648.00
Ensign, John	\$734,741.00	\$697,082.00	\$37,659.00
Blagojevich, Rod R	\$330,287.00	\$290,675.00	\$39,612.00
Kingston, Jack	\$214,668.00	\$172,300.00	\$42,368.00

APPENDIX D:

Methodology

Choosing the Candidates:

The Project On Government Oversight (POGO) obtained information from the Federal Election Commission's own internet databases, as compiled by the Center for Responsive Politics, which allowed us to compare how much candidates reported they received from PACs during the 1995-1996 election-cycle with how much the PACs recorded they had actually given for the same election period.

Careful to be nonpartisan in its approach, POGO chose candidates in two different categories. First, we analyzed the top four candidates (2 Democrats and 2 Republicans) whose differential was greatest between their reported receipts and the FEC's totals for the PAC's contributions. We then probed the records of six additional candidates, again an even split of Democrats and Republicans, whose differential alone was larger than the total receipts reported by the candidates -- including some candidates who claimed not to have accepted any PAC money at all.

Collecting the Data:

Because of the lack of a standard system, collecting data at the FEC was a very labor-intensive process. While the FEC does have an electronic filing system, it is currently used only by approximately fifty committees and its use has yet to be required.

The lack of a central system makes it very difficult to locate and cross-reference data. To perform this task POGO utilized computer databases categorized by PACs, candidates and campaign committees as well as hundreds of microfilms. In some cases, the FEC is incapable of cross-checking its own various internal filing systems to verify, with any accuracy, whether candidates have properly reported campaign contributions.

All campaign contribution information is compiled on microfilm and separate "user-unfriendly" computer databases. POGO viewed campaign receipt reports submitted by the candidates and their corresponding microfilm locations. In practice, each report is created to reveal the identity of all receipts and disbursements, the date and amount of each contribution and the contribution's intended use.

After locating, sorting through and printing each candidate's reported campaign receipts from microfilm, POGO manually cross-referenced each receipt to the FEC's "Long E-Index." The "E-Index" details the FEC's record of PAC disbursements to each candidate and served as POGO's standard record for comparison.

Synthesizing Information:

POGO created databases for each candidate outlining the hundreds of thousands of dollars in "unreported" contribution money. This money was reported by individual PACs but was absent

from the ten candidates' contribution receipts. We then looked up the itemized PAC disbursement for each unreported contribution in an effort to double-check the accuracy of the FEC filing system as well as to verify the PAC's disbursement of a check to the candidate.

Obtaining Candidates Responses:

Using this data, we sent letters to each of the candidates and their respective campaign offices explaining the nature of our project and asking them to confirm or deny reporting each unreported contribution on the enclosed copy of our database. Only nine of the original ten candidates received an inquiry letter — James Leach (R-IA) was excluded because POGO's investigation showed a difference of only \$16.00, an insignificant fraction of the total amount found in the FEC's unreliable databases.

Verifying Candidate Information:

After receiving responses to our inquiry, POGO then processed the candidates' responses and verified them using the FEC's data and PAC's disbursements. Three candidates, Joseph Biden (D-DE), Henry Gonzalez (D-TX) and Ronald Kind (D-WI), did not respond to our original inquiry sent to them via fax and mail on October 17, 1997, or POGO's follow-up letter sent on November 17, 1997.

Not only has Rep. Kind not responded to our inquiry, but he has not responded to two FEC "requests for additional information" sent to his campaign in February and March 1997.²⁴ In 1997 the FEC sent Rep. Kind two requests for information concerning contributions that were not reported on his "30 Day Post-General Report." The FEC cited a total of 29 contributions that were not reported. POGO's review confirmed that 23 of those 29 contributions were not reported and found that 62 other contributions were also believed not to have been reported. When asked to confirm or deny the reporting of these contributions, Ms. Mary Jo Murphy, Treasurer of Rep. Kind's campaign, responded that she was unable to respond to our request.²⁵

PAC Confirmation:

After double-checking the candidates' responses, POGO sent out letters to their respective PACs asking for confirmation as to the status of these unreported contributions. For example, some candidates reported that they had either returned checks or never received a contribution. POGO sent letters to the PACs requesting that they provide a copy of the canceled or voided check or an update as to the status of the check. POGO received responses from approximately 25% of the PACs that were sent inquiry letters.

²⁴ Phone conversation with David Hume, Reports Analyst, Reports Analysis Division, Federal Election Commission, February 20, 1998.

²⁵ See Appendix G, FEC Requests for Additional Information, February and March 1997, and Response to POGO, October 30, 1997.

Data Compiled into Examples:

Because of our updated campaign contribution information from some of the candidates and some of the PACs, POGO was able to draw conclusions and provide the FEC with recommended reforms. Many responses POGO received from both the candidates and the PACs confirmed that our initial research was correct by stating that they were in the process of filing amendments to correct their previous reporting errors.

APPENDIX E:

POGO's Common Sense Campaign Finance Disclosure Reforms

FEC Action Required

Problem and Reform	Long-Term Savings for the FEC	Provides More Accurate Disclosure for the Public	Protects Candidates From Unfair Allegations
--------------------	-------------------------------	--	---

Utilize Existing Checks and Balances: Compare Databases

The FEC does not compare PAC receipts reported by candidates with contributions reported by the PACs. This current system allows inaccuracies in FEC data to go undetected and uncorrected.



The FEC should compare sets of data as a basis for checking the accuracy of PAC and candidate data.

Group FEC Data by Campaign-Cycles

The FEC groups data in two calendar year periods. As a result, it is nearly impossible to determine violations of contribution limits.



The FEC should begin to group data by two- and six-year campaign-cycles.

Eliminate Irregular PAC Names

The FEC, the candidates and the PACs use neither the same name for a PAC nor their already-established identification numbers when filing receipts and disbursements, making it difficult to check contribution limits.



The FEC should enforce its current requirement to use similar PAC names (i.e., the name printed on the check) and require I.D. numbers on all receipts and disbursements.

POGO's Common Sense Campaign Finance Disclosure Reforms

FEC Action Required

Problem and Reform	Long-Term Savings for the FEC	Provides More Accurate Disclosure for the Public	Protects Candidates From Unfair Allegations
--------------------	-------------------------------	--	---

Eliminate Duplicate Entries

The FEC does not correct many duplicate entries in filings submitted by candidates. The FEC also often unwittingly creates duplicate entries by assigning two different transaction numbers to the same contribution.



Once duplicates are discovered, the FEC should send an inquiry to the PAC asking for confirmation of the two contributions.

Candidates Should Report Returned Checks

When PAC contributions are returned by candidates, PACs often do not report the unaccepted contribution to the FEC, although it is currently required.



The FEC should recommend to candidates who return PAC contributions, that they provide the FEC with a list of the PACs and the returned contributions.

Notify Candidates of All "In-Kind" Contributions

Campaign committees are not always aware of "in-kind" PAC even though the contributions have been reported by the PACs to the FEC.



The FEC should require PACs to notify campaign committees of all "in-kind" contributions.

POGO's Common Sense Campaign Finance Disclosure Reforms

FEC Action Required

Problem and Reform	Long-Term Savings for the FEC	Provides More Accurate Disclosure for the Public	Protects Candidates From Unfair Allegations
--------------------	-------------------------------	--	---

FEC Needs Better Tools to Encourage Compliance

The FEC does not have adequate tools to enforce compliance or deter noncompliance with regulations.

* The FEC should consider publishing a report, press release and web page that would list PACs and candidates whose reports were found by the FEC to be incomplete or inaccurate. (1)



* A fee schedule should be created and enforced for noncompliance.

(1) The FEC already publishes a list of "Campaigns Cited for Failure to File Complete Pre-General Reports."

POGO's Common Sense Campaign Finance Disclosure Reforms

Legislative Action Required

Problem and Reform	Long-Term Savings for the FEC	Provides More Accurate Disclosure for the Public	Protects Candidates From Unfair Allegations
--------------------	-------------------------------	--	---

Candidates and PACs Should Report Contributions by Campaign-Cycles

Candidates and PACs file primary and general campaign data in monthly, quarterly and semiannual reports by calendar year. Campaign finance laws, however, do not correspond with calendar years, but with primary and general campaign-cycles.



New legislation should require PACs and candidates to file by two- and six-year campaign-cycles. This reform may also require extending contribution limits from the current per-election basis to campaign cycles.

FEC Needs Better Tools to Encourage Compliance

The FEC does not have adequate tools to enforce compliance or deter noncompliance with regulations.



The FEC should be granted the authority to conduct random audits as a deterrent to noncompliance.

Mandatory Electronic Filing

Electronic filing is not required for candidate or PAC filings.



If electronic filing were mandated by Congress for candidates and PACs reporting over a certain level of financial activity, many, if not all, of these reforms could be incorporated into the electronic filing system. This system would dramatically increase the accuracy and thoroughness of FEC data.

POGO's Common Sense Campaign Finance Disclosure Reforms

Legislative Action Required

Problem and Reform	Long-Term Savings for the FEC	Provides More Accurate Disclosure for the Public	Protects Candidates From Unfair Allegations
--------------------	-------------------------------	--	---

Streamline Senate Filing

The Senate mandates that its candidates file their reports with the Secretary of the Senate (Office of Public Records) which only sends the reports to the FEC on microfilm.



Senate candidates should be required to send their filings directly to the FEC, as is already required of the House.

Streamline Joint Fund-Raisers & Multi-Candidate Committees

PACs usually issue one check that is later divided by multiple candidates involved in a multi-candidate entity. This practice muddies disclosure.



Congress should require that separate checks be issued to each participating member in the multi-candidate entity.

APPENDIX F:

Congressman
LANE EVANS

P.O. Box 5263 • Rock Island, IL 61204

Phone (309) 788-5263

FAX (309) 788-5274

February 9, 1998

Danielle Brian
POGO
1900 L Street, NW #314
Washington, D.C. 20036-5027

Dear Ms. Brian:

In response to your letter dated February 2, 1998, concerning a contribution from the Friends of Lane Evans Committee to the Wyden for Senate Committee, I am providing the following information.

The Friends of Lane Evans Committee issued check #3492 on January 30, 1996, in the amount of \$500, to the Wyden for Senate Committee. There was only one check issued from this committee. Any duplicate records reported are errors on the behalf of the Wyden for Senate Committee or the Federal Election Commission.

If you have any further questions, please feel free to contact me at 309-788-5263.

Thank you.

Respectfully,



Eric Nelson
Deputy Political Director
Friends of Lane Evans Committee

F-1

111 S.W. Fifth Avenue
Post Office Box 8837
Portland, OR 97208-8837

Project On Government Oversight
1900 L. Street, NW, Suite 314
Washington, DC 20036-5027

Mr. Scott Amey

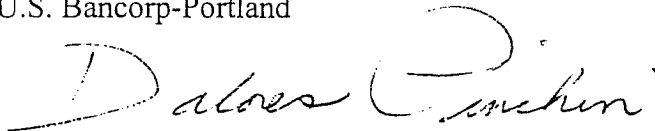
Subject: Duplicate FEC filings-Ron Wyden

As we discussed on the telephone Friday, February 13, 1998, our office in Government Relations filed in error two PAC-Oregon FEC reports with overlapping reporting periods. The reporting time periods were 1/24/1996 covering the period of 7/1/95 through 12/31/98 and on 1/29/98 for the period covering 7/1/95 through 11/15/95. Both reported \$1,000 dollars being contributed to Ron Wyden; when in fact only one contribution for \$1,000 was actually made.

So, for the year of 1995, only one contribution was made to Ron Wyden and that was for \$1,000.00 on 11/14/95.

If you have any further questions or need for copies of the actually filings, please call me at 503-275-5793.

Dolores Pinchin
Administrative Assistant
Government Relations
U.S. Bancorp-Portland

A handwritten signature in cursive script that reads "Dolores Pinchin".

APPENDIX G:



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Mary Jo Murphy, Treasurer
Kind for Congress Committee
505 King Street, Suite 010
La Crosse, WI 54601

FEB 11 1997

Identification Number: C00312017

Reference: 30 Day Post-General Report (10/17/96-11/25/96)

Dear Ms. Murphy:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Please provide Column A totals for Lines 11(a)(i), 11(a)(ii), 11(a)(iii), 11(b) and 11(c) of the Detailed Summary Page.

-On the Detailed Summary Page, Line 24 of the cash summary should equal the Column A total for Line 16. Please correct this discrepancy and file an amendment to your report.

-Your committee filed 48 hour notices reporting the following "last minute" contributions:

<u>Contributor</u>	<u>Date</u>	<u>Amount</u>
American Occupational Therapy Assoc., Inc. PAC	11/1/96	\$1,000.00
John D. Dingell for Congress Committee	11/1/96	\$1,000.00
St. Croix Tribal Council	11/1/96	\$1,000.00
Laborers' Political League	11/1/96	\$1,000.00
AT&T PAC	11/1/96	\$1,000.00
Joyce Wachsmuth	11/1/96	\$1,000.00
Darryl Hofland	11/1/96	\$1,000.00
Robert Wachsmuth	11/1/96	\$1,000.00
Jennifer Doane	11/1/96	\$1,000.00
Re-Elect Congressman Joe Moakley Committee	11/1/96	\$1,000.00

<u>Contributor</u>	<u>Date</u>	<u>Amount</u>
UPS PAC	10/30/96	\$1,000.00
Committee on Political Education AFL-CIO	10/30/96	\$5,000.00
Effective Government Committee	10/30/96	\$2,000.00
Sheet Metal Workers International Association	10/30/96	\$1,000.00
EDGE	10/28/96	\$1,000.00
Carpenters Legislative Improvement Committee	10/28/96	\$2,500.00
St. Croix Tribal Council	10/28/96	\$1,000.00
SEIU COPE Fund PCC	10/28/96	\$1,500.00
IBEW-COPE	10/28/96	\$1,000.00
Nat. Com. to Preserve Social Security & Medicare	10/28/96	\$1,000.00
Mortgage Insurance PAC	10/28/96	\$1,000.00
IBEW-COPE	10/28/96	\$2,000.00
NARAL PAC	10/28/96	\$1,500.00
Credit Union Legislative Action Council	10/28/96	\$1,000.00
American Fed. of State, County, & Municipal Emp.	10/26/96	\$5,000.00
Committee for a Progressive Congress	10/26/96	\$1,000.00
Voters for Choice	10/26/96	\$1,000.00
Barrett for Congress	10/18/96	\$1,000.00
Friends of Rosa DeLauro	10/18/96	\$1,000.00

These contributions do not appear on Schedule A of this report. Please amend your report to include these contributions or provide an explanation of these apparent discrepancies.

-Schedule A of your report indicates that your committee may have failed to file one or more of the required 48 hour notices regarding "last minute" contributions received by your committee after the close of books for the 12 Day Pre-General Report. A principal campaign committee must notify the Commission, in writing, within 48 hours of any contribution of \$1,000 or more received between two and twenty days before an election. These contributions are then reported on the next report required to be filed by the committee. To ensure that the Commission is notified of last minute contributions of \$1,000 or more to your campaign, it is recommended that you review your procedures for checking contributions received during the aforementioned time period. Although the Commission may take legal action, any response you wish to provide concerning this matter will be considered. (11 CFR §104.5(f))

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days

KIND FOR CONGRESS COMMITTEE
PAGE 3

of the date of this letter. If you need assistance, please feel free to contact me on a
toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,

David T. Hume

David T. Hume
Reports Analyst
Reports Analysis Division

462

97.03.183.1520



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-3

March 6, 1997

Mary Jo Murphy, Treasurer
Kind for Congress Committee
505 King Street, Suite 010
La Crosse, WI 54601

Identification Number: C00312017

Reference: 30 Day Post-General Report (10/17/96-11/25/96)

Dear Mr. Murphy:

This letter is to inform you that as of March 5, 1997, the Commission has not received your response to our request for additional information, dated February 11, 1997. This notice requests information essential to full public disclosure of your federal election campaign finances. To ensure compliance with the provisions of the Federal Election Campaign Act (the Act), please respond to this request (copy enclosed).

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions regarding this matter, please contact David T. Hume on our toll-free number (800) 424-9530 or our local number (202) 219-3580.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

Enclosure

October 30, 1997

Project on Government Oversight
1900 L Street NW, Suite 314
Washington, DC 20036-5027

Re: Congressman Ron Kind

I am in receipt of your letter dated October 17, 1997, stating that your database outlines a different PAC contribution total than the FEC reporting database systems have. You indicate that the PAC contribution difference between your database and the FEC database is \$90,921 for the reporting period 1995-1996. I am the treasurer of the Kind for Congress campaign and have completed and timely filed all FEC reports that were required for the 1995-1996 election cycle. All of our PAC contributions are indicated on those FEC reports, a copy of which you can retrieve from the FEC itself.

You are asking me to verify information from your database by November 3, 1997, so you may assess whether the FEC is effectual in its mission as an agency of disclosure for campaign finance. The request you have is one I do not have the ability to make under your time constraints. Our committee does not have the manpower to accommodate your request in the short time frame you indicate. I am the only individual who files the reports with the FEC; the Internal Revenue Service; the Department of Industry, Labor and Human Relations; the State of Wisconsin; the Secretary of State; the Wisconsin election commission; the U.S. House of Representatives; and many other organizations making such requests. I am a single person with a full-time job and multiple other duties. The treasurer position for Representative Ron Kind is volunteer, and I am happy to perform my duties in this position. I am unable to assume additional requests from agencies that put unreasonable time constraints in those requests.

As a result, I will not accommodate your suggestion of retrieving and searching for historical information for your project.

Sincerely,



Mary Jo Murphy, JD/CPA

MJM:mfb