

Richard Nixon Presidential Library
White House Special Files Collection
Folder List

<u>Box Number</u>	<u>Folder Number</u>	<u>Document Date</u>	<u>Document Type</u>	<u>Document Description</u>
25	15	4/26/1972	Memo	Alabama. Notation of conversation with Mrs. Amos Re: file disclosure reports. 1 page.
25	15	5/19/1972	Memo	Arizona. Notation of Conversation with Mrs. Rose Mofford. Re: Committee Reports. 1 page.
25	15	5/16/1972	Memo	Arkansas. Re: Disclosure Requirements. 1 Page
25	15	4/26/1972	Memo	Arkansas. Notation of conversation with gentleman in the Secretary of State's office. Re: Disclosure requirement. 1 page.
25	15	5/02/1972	Memo	California. Notation of conversation between Tom Lumbard and Mr. Lowenstein. Re: Report Requirements. 1 page.
25	15	5/19/1972	Memo	Connecticut. Notation of conversation with Miss Kerr. Re: General election reports. 1 page.

<u>Box Number</u>	<u>Folder Number</u>	<u>Document Date</u>	<u>Document Type</u>	<u>Document Description</u>
25	15	4/26/1972	Memo	District of Columbia. Notation of Conversation with Martin Schaller Re. Reporting Requirements. 1 page.
25	15	4/27/1972	Memo	Florida. Notation of conversation between Tom Lumbard and Mrs. Glisson. Re: Reporting Requirements. 1 page.
25	15	4/27/1972	Memo	Illinois. Notation of Conversation between Tom Lumbard and Mr. Hollenkamp. Re: reporting Requirements. 1 page.
25	15	5/03/1972	Memo	Indiana. Notation of conversation with Mr.Davis. Re: Reporting requirements. 1 page.
25	15	4/28/1972	Memo	Maryland. Notation of conversation between Tom Lumbard and Willard Morris. Re: Reporting requirements. 2 pages.
25	15	4/27/1972	Memo	Massachusetts. Notation of conversation with Miss Keneen. Re: Reporting requirements. 1 page.
25	15	5/02/1972	Memo	Michigan. Notation of conversation with Howard McCowan. Re: Disclosure report requirements. 1 page.

<u>Box Number</u>	<u>Folder Number</u>	<u>Document Date</u>	<u>Document Type</u>	<u>Document Description</u>
25	15	4/26/1972	Memo	Nebreska. Notation of conversation with Ralph Englert. Re: Disclosure report requirements. 1 page.
25	15	4/24/1972	Memo	New Hampshire. Notation of conversation between Tom Lombard and Donna Bissonnette. Re: Reports for primary receipts and expenditures. 1 page.
25	15	4/26/1972	Memo	New Jersey. Notation of conversation with Mrs. Bonorino. Re: Disclosure reports. 1 page.
25	15	4/26/1972	Memo	New Mexico. Notation of Conversation with Mrs. Lucille Cederbocker. Re: Disclosure reports. 1 page.
25	15	4/26/1972	Memo	New York. Notation of conversation with Mrs. Reiner. Re: Disclosure reports. 1 page.
25	15	4/26/1972	Memo	Ohio. Notation of conversation with Mr. Ferris. Re: Disclosure reports. 1 page.
25	15	5/03/1972	Memo	Oregon. Notation of conversation with Mrs. Kitsmiller. Re: Reporting requirements. 1 page.

<u>Box Number</u>	<u>Folder Number</u>	<u>Document Date</u>	<u>Document Type</u>	<u>Document Description</u>
25	15	4/26/1972	Memo	Pennsylvania. Notation of conversation with Mrs. Jack. Re: Disclosure reports. 1 page.
25	15	4/27/1972	Memo	Rhode Island. Notation of conversation between Tom Lumbard and Miss Isabelle R. Viault. Re: Disclosure requirements. 1 page.
25	15	4/26/1972	Memo	South Dakota. Notation of conversation with Mrs. Alma Larson. Re: Report requirements. 1 page.
25	15	4/26/1972	Memo	Tennessee. Notation of conversation with Mr. S. Hessler. Re: Report requirements. 1 page.
25	15	4/28/1972	Memo	West Virginia. Notation of conversation between Tom Lumbard and Ralph Bean. Re: Reporting requirements. 1 page.
25	15	4/26/1972	Memo	West Virginia. Notation of Conversation with Ralph Bean. Re: Disclosure question. 1 page.
25	15	4/27/1972	Memo	Wisconsin. Notation of conversation between Tom Lumbard and Mr. Fahey. Re: Report requirements. 1 page.

<u>Box Number</u>	<u>Folder Number</u>	<u>Document Date</u>	<u>Document Type</u>	<u>Document Description</u>
25	15	6/08/1972	Memo	Virgin Islands. Notation of conversation between Tom Lombard and Attorney General Ronald Tonkin. Re: Federal reports for the V.I. 1 page.
25	15	1972	Brochure	Duplicate copy of Fund-Reporting Facts, 1972 Presidential Primaries. Not scanned. 1 page.
25	15	n.d.	Form	State Reporting Requirements form partially filled out. 2 pages.
25	15	n.d.	Memo	Notes/ List Re: States requiring Pre-Election reports. 1 page.
25	15	05/11/1972	Letter	E. M. Madden to Candidate, re: Pre-election contribution and expenditure reports. 16 pages with attachments and duplicates.

ALABAMA
(205) 269-6011

Spoke with Mrs. Amos, Secretary of State. She said the President is not required to file a disclosure report. Each delegate pledged to him in the May 2 delegate selection primary must file an individual report which she provides directly to the delegate.

April 26, 1972

ARIZONA
(602) 271-4286

Contact: Mrs. Rose Mofford, Assistant Secretary of State.

Pre-Convention

No reports.

General Election

Committee report due December 7. No candidate requirement.

T. L.
5/19/72

ARKANSAS
(501)374-1628

Primary

Arkansas has disclosure requirements but they do not apply either to the President or to the Committee to Re-Elect the President, since there is no Republican presidential primary there. The preference primary law was repealed in March. Delegates are selected entirely by committees. See Ark. Election Law, Sec. 3-202, 3-204.

General Election

The statute is so broadly written that it presumably applies to presidential candidates: "Any candidate that shall seek public office in any election" must file a report of all expenditures over \$25 within 60 days after the election. Section 3-1102. But Arkansas' statutes generally treat the presidential election as the election of the state's individual electors. Sec. 3-206. We should inquire as to the established practice - sometime before January 1973.

T. L.
May 16, 1972

ARKANSAS
(501) 374-1628

Spoke with a gentleman in the Secretary of State's office who was uncooperative. The gist of what he told me is that Arkansas does have a disclosure requirement, the report being due within 30 days after the May 30 primary. He said we should consult the Arkansas code. His secretary promised to send a copy of the pertinent code sections to Dave Wilson.

April 26, 1972

CALIFORNIA
(916) 445-6371

On May 2 Tom Lombard spoke to Mr. Lowenstein in the office of the Secretary of State. He is sending to all candidates a letter outlining California's report requirements and enclosing the relevant forms. They are, in brief:

By July 11, each presidential primary candidate must submit a list of all contributions and expenditures received or made with respect to the primary. Copies of Federal reports are accepted for what Federal law covers, but California also requires (1) pre-April 7 contributions/expenditures and (2) contributions of \$100 or less.

But, it is sufficient if the President states that he has authorized no one but X [e. g., California Committee for the Re-Election of the President] to act for him and that no expenditures or contributions other than those by or to X were made with his knowledge and consent.

The above was oral from Mr. Lowenstein and we should see whether the letter ~~a~~ amends it. He will send a copy of the letter to Dave Wilson.


5/2/72

CONNECTICUT
(203) 566-2723; 5827

Contact: Miss Kerr, Administrative Division, Secretary of
State.

Pre-Convention

No reports.

General Election

Registration of treasurer and bank depository must be filed.

Reports due December 7. No individual candidate report. Forms
being sent.

T. L.
5/19/72

DISTRICT OF COLUMBIA
629-4401

Mr. Martin Schaller, Assistant to Mayor Washington. Spoke with Mr. Schaller who told me D. C. has no specific disclosure and reporting requirements. He is accepting in his office the same reports filed with the clerk of the House of Representatives. He feels that so long as the same reports are filed with him, the District's legal requirements are met.

April 26, 1972

FLORIDA
(904) 224-2171

Tom Lombard spoke to Mrs. Glisson in the Elections Division of the office of Richard B. Stone, Secretary of State on 4/27. A report from each group or committee that collected or expended funds on behalf of a candidate is due 45 days after the primary (i. e. April 28). The information required is similar to that required by the post-election report form; she will send copies to Dave Wilson.

Presidential primary candidates are not personally required to file, as they are not candidates for an office in the state, according to a recent ruling of the state attorney general. The only applicable provision, Section 99.161(15), Florida Statutes, requires a report to the Secretary of State by a "person, group, or committee... receiving or spending any moneys or things of value in behalf of any candidate for...federal office...", with a copy to the candidate and to the chairman of the state committee of his party. (N.B.: Florida requires presidential candidates to file affidavits of non-candidacy to get off the ballot, and this can hardly require them to file.)

RL

ILLINOIS
(217) 525-7017

Tom Lombard spoke to Mr. Hollenkamp, Division of Index,
Office of the Secretary of State on 4/27. No reports are presently
required respecting primary or election receipts or expenditures
except the election reports filed with the Federal Comptroller General,
but several bills are pending.

TL

INDIANA
(317) 633-4000, x6859

Spoke with Mr. Davis, an attorney in the State Board of Elections, who told me to check Burns Indiana Statutes, Vol. 7, pt. 1. There are expenditure reports which must be filed by the treasurer of the Committee to Re-Elect the President within 45 days after the May 2 primary. There is no specific form or document which must be used. Mr. Davis is sending Dave Wilson a copy of the election laws on the subject.

April 26, 1972

Primary Election Laws of Indiana, issued by the State Election Board, indicates (pp. 27-30) that a candidate's "political agent" or, if he appoints no such agent, the candidate himself, must keep detailed records and file a financial report within 45 days after the primary (i. e. by June 16). Since the law calls for filing in the candidate's or agent's county of residence, its applicability to the presidential primary is vague.

Mr. Wayne Davis in the office of the Board advised me today, that, if the President appointed no political agent and made no expenditures for the Indiana primary (in which he was unopposed), he is not required to file a report. I suggest that a letter be sent to the Board to obtain written verification of this.

T.L.
T. L.
May 3, 1972

MARYLAND
(301) 267-5861

On 4/28 Tom Lumbard spoke to Willard Morris, State Administrator of Election Laws. He advised:

1. As a presidential candidate placed on the ballot by the Secretary of State (see letter of Secretary of State to President, 2/28/72), the President is not required to file reports of receipts and disbursements as an individual. Similar advice has been given to Democratic candidates.

2. But, since the Republican State Committee has filed with the State Board of Election Laws appropriate notification of the creation of a Maryland Committee for the Re-Election of the President, that Committee must file the reports required by Section 26 of the Election Laws before noon on May 9. This is a joint requirement of the committee's designated chairman (Edward P. Thomas) and treasurer (Leonard C. Krewe, Jr., Western Run Road, Cockeysville).

A post primary report must also be filed by them by noon on June 15.

While the statutory report form calls for each candidate to *attest* to the report of his committee, Section 26-12, that presumably does not apply to a candidate for presidential nomination, placed on the ballot by the Secretary of State, if he has not personally designated the committee's treasurer. See Section 26-11(a), (b). [Note: the

Humphrey people have tried to disestablish their state committee treasurer, without success.]

Morris' secretary will send Dave Wilson a copy of the summary of Maryland's laws relating to contributions.

General election Financial Reports are due on October 31 and December 7 at noon.



MASSACHUSETTS
(617) 727-2832

Miss Keneen, Public Records Division, office of the Secretary of State, informed us on 4/27 that the President himself need not file a disclosure report, although committees working on his behalf must file. Some have already done so. (Deadline is May 9, two weeks after the primary.)

Mass. General Laws. Chapter 55, Section 17 requires the treasurer of a committee "organized on behalf of a candidate for president" to take certain actions respecting campaign receipts and expenditures; the office itself is omitted with respect to candidates. So the above information is correct.

MICHIGAN
(517) 373-1837

Spoke with Mr. Howard McCowan in the Election Board section of Secretary of State's office. He told me that a written opinion of the Michigan Attorney General dated 4/7/72 states that the Committee to Re-Elect the President is not required to file a disclosure report. He is sending Dave Wilson a copy of this written opinion.

April 26, 1972

The above mentioned Attorney General's letter states that presidential primary candidates are not covered by Michigan's disclosure laws, and that therefore committees supporting such candidates are similarly exempt from its filing requirements.


T. L.
May 2, 1972

NEBRASKA
(402) 471-2311

Spoke with Ralph Englert in the Secretary of State's office who told me Nebraska has no state law requiring the Committee to Re-Elect the President to file any type of disclosure report.

April 26, 1972

Tom Lombard checked the statutes on 5/16/72. Applicable provisions (Sections 32-1102, 1103) explicitly cover only candidates for Congress and for state offices, and the general definition of "candidate" (Sec. 32-111) specifically excludes candidates for president and vice-president.

But, for general election purposes, it may be necessary for a report to be filed on behalf of the candidates for elector, or by a state committee. (The definition of "political committee," Sec. 32-119, is broad and would include presidential campaign committees.) Nebraska requires reports before the election, according to Common Cause.

NEW HAMPSHIRE
(603) 271-1110

Tom Lumbard spoke to Donna Bissonnette in the office of Robert Stark, Secretary of State, 4/27. She confirmed that no reports need be filed for primary receipts and expenditures.

Election statements of receipts and expenditures must be filed on September 6 and November 1, by the state committees and major candidates. Forms not yet available.



NEW JERSEY
(609) 292-2121

Spoke with Mrs. Bonorino in George Bloom's office in the Election Division of the Secretary of State. She told me N. J. state law does not require the presidential candidate to file a disclosure report. However, each primary delegate pledged to the candidate must file an individual report.

April 26, 1972

Pres. not on ballot but delegates will be selected.

NEW MEXICO
(505) 827-4011

Spoke with Mrs. Lucille Cederbocker in the Secretary of State's office. She told me that the state's law on the subject is not clear but a recent state bill passed by the legislature would seem to require the Committee to Re-Elect the President to file a disclosure report, the same as candidates for lesser offices do. She is sending Dave Wilson this new state law and also the necessary disclosure forms. Filing deadline is June 16th.

April 26, 1972

N.M. Primary calendar says President must file on 6/16 a list of expenditures; committees must file on 7/6 both receipts and expenditures. But will check statute, forms when received.

TL 5/2

NEW YORK
(518) 474-6220

Spoke with Mrs. Reintera in the Election Bureau of the Secretary of State's office. She told me that N.Y. state law has no requirement that the President must file a disclosure report in connection with the June 20 delegate selection primary.

April 26, 1972

OHIO
(614) 469-2000, x 3084

Spoke with Mr. Ferris in Elections Section of Secretary of State's office. He told me the Committee to Re-Elect the President is not required under state law to file any disclosure reports. Each primary delegate pledged to the President must file his own disclosure report on a form sent to him directly.

April 26, 1972

OREGON
(503) 378-4144

Spoke with Mrs. Kitsmiller in the Elections Division of the Secretary of State's office. She told me Oregon law requires specific forms (# 131 for receipts and # 131A for expenditures) to be filed by the Committee for the Re-Election of the President. She is sending Dave Wilson these forms and also the state's election manual.

April 26, 1972

Oregon Revised Statutes Section 260.005(1) defines "candidate" so broadly as to include presidential preference primary candidates. Sections 260.072 states the responsibility of a candidate's "political treasurer" to file reports: (1) 10 to 7 days before an election (May 13-16) and (2) 30 days after the election. Section 260.035 (3) forbids contributions or expenditures "by or on behalf of a candidate" until he appoints a political treasurer (certifying his name to the Secretary of State), and otherwise than through such treasurer.

While this might allow a candidate to avoid filing by appointing no treasurer, (since a candidate may appoint himself but does not necessarily do so by not appointing someone else), it would be advisable for the President either (a) to appoint a treasurer or (b) to file a treasurer's statement reciting the lack of a treasurer and the concomitant lack of anything to report. I recommend the latter, which was orally suggested by Mrs. Kitsmiller to me today.

T. L. 
May 3, 1972

PENNSYLVANIA
(717) 787-5280

Spoke with Mrs. Jack in the Election's Bureau of the Secretary of State's office. She told me each presidential candidate entered in the 4/25 primary must file a disclosure report within 30 days following the primary. So must a Committee working in his behalf. She is sending the necessary forms to Dave Wilson.

April 26, 1972

RHODE ISLAND
(401) 277-2358

Tom Lombard spoke to Miss Isabelle R. Viault, Deputy Secretary of State on 4/27. She confirms that Rhode Island has no law requiring disclosure of candidates' receipts or disbursements, for either primary or general elections.

A handwritten signature or set of initials, possibly 'TL', written in black ink.

SOUTH DAKOTA
(605) 224-3537

Spoke with Mrs. Alma Larson, Secretary of State. (She is a Republican) She told me that Title B, Section 1225 of the South Dakota Code requires a report to be filed by the Committee to Re-Elect the President within 30 days after the June 6 primary. Thus, the report should be filed by July 6. She is sending Dave Wilson several copies of the document which must be filed.

April 26, 1972

*At least as a representative
in behalf of candidate*

TENNESSEE
(615) 741-2650

Spoke with Mr. S. Hessler, Election Co-ordinator in the Secretary of State's office. He told me Tennessee has no filing requirements for candidates for Federal office -- from President to U. S. Congressman.

April 26, 1972

WEST VIRGINIA
(304) 348-3456

Tom Lumbard spoke on 4/28 with Ralph Bean in the office of Secretary of State. He confirms that the President has not filed for the primary there, is not a candidate in the primary, and therefore is not obligated to file a financial statement with respect thereto.

General election: "candidates" and political committees must file statements by October 31 and December 7. It is not clear whether, in presidential elections, this covers the candidates for president or for the electoral college. Mr. Bean is apparently seeking an opinion of the state A.G. on this question.

10/24 Bean informed Joe Adams that A.G. refused to rule on this question, so he is not certain whether or not a report is required

WEST VIRGINIA
(304) 348-3456

Spoke with office of Ralph Bean in the Secretary of State's office. He was not there but his secretary told me that a young lady from the Committee to Re-Elect the President had talked over the telephone with Mr. Bean a few days ago. Bean is still awaiting a written opinion from the State Attorney General on the disclosure question and will call our young lady back today or within the next few days to indicate what should be done, if anything.

April 26, 1972

pc done 4/26

WISCONSIN
(608) 266-3330

Tom Lombard spoke to Mr. Fahey in the Office of the Secretary of State on 4/27. He confirms that no reports must be filed in Wisconsin by candidates for president or vice-president, as they are statutorily excluded from the "candidates" who must file reports. Election Law Section 12.01(2); see also 12.20 (office not listed). CQ for 4/1/72 is in error.

VIRGIN ISLANDS
(809) 774-1163 or 5624

On June 8, Tom Lombard spoke to Attorney General Ronald Tonkin, who advised that the V.I. delegates would be selected at local caucuses. It thus appears that no federal reports need be filed for the V.I.

T. L.
6/8/72

State Reporting Requirements

<u>State</u>	<u>Reports Required</u>				<u>Comments</u>
	<u>Primary</u>	<u>Dates Due</u>	<u>General</u>	<u>Dates Due</u>	
Alabama	May 2	May 17			Delegate selection
Alaska					
Arizona	✓				
Arkansas	May 30				Primary law repealed.
California	June 6	July 11			Not required
Colorado					
Connecticut	✓				
Delaware					
Florida	* Mar. 14	April 28			Committees only
Georgia					
Hawaii					
Idaho					
Illinois	Mar. 21	N/A			No statute
Indiana	May 2	6/16 ^{OK} _{not required}			Not covered by statute
Iowa					
Kansas					
Kentucky					New law may conform to
Louisiana					
Maine					
Maryland	* May 16	5/9, 6/15			Committees only
Massachusetts	* Apr. 25				
Michigan	May 16	N/A			
Minnesota					
Mississippi					
Missouri					
Montana					
Nebraska	* May 9	N/A			Not covered by statute
Nevada					
New Hampshire	Mar. 7	N/A			

State Reporting Requirements

<u>State</u>	<u>Reports Required</u>		<u>Comments</u>	
	<u>Primary</u>	<u>Dates Due</u>		<u>General</u>
New Jersey	June 6	N/A		Delegate selection
New Mexico	June 6	6/10 11/2		
New York	June 20			Delegate selection
North Carolina	May 6	4/6, 5/26		
North Dakota				
Ohio	May 2	June 16		Delegates only
Oklahoma				
Oregon **	May 23	5/16, 6/22		Gray will file by 6/22
Pennsylvania	Apr 25	N/A		RN not on ballot - del. select
Rhode Island *	Apr 11	N/A		No reporting law
South Carolina				
South Dakota	June 6	July 6		Filed
Tennessee *	May 4	N/A		Not covered by statute.
Texas				
Utah				
Vermont				
Virginia				
Washington				
West Virginia	May 9	N/A		RN not on ballot
Wisconsin *	Apr. 4	N/A		Not covered by statute
Wyoming				
American Samoa				
Guam				
Puerto Rico				
Virgin Islands	July 4			Delegate selection
Trust Territory of the Pacific Is:				

2 of 10
 ** Can't get off ballot, once designated a "candidate"
 * Affirmative action required to remove name from ballot.

No requirement. Will accept Federal forms

States Requiring Pre-Election Reports (per common
cause)

Florida
Kentucky
Maryland
Minnesota
Mississippi
Nebraska *
New Hampshire
New Jersey
New York
North Carolina
South Carolina
Texas
Utah
Virginia
West Virginia *
Wisconsin

* A

(omits Oregon)