



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 1029

Date Filmed 1/25/80 Camera No. --- 2

Cameraman SPC

80040173527

APR 27 1980

REPORTS ANALYSIS REFERRAL UPDATE

*ORIGIN: RAD

DATE January 21, 1980

ANALYST Alva Smith AS

TO: Office of General Counsel
ATTENTION: John Levin

TEAM CHIEF Bobby Werfel BW

THROUGH: STAFF DIRECTOR AS

COMPLIANCE REVIEW Carroll Bowen CB/PS

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS AS

MUR No. 1029

DATE OF ORIGINAL REFERRAL 11/27/79

**PURPOSE:

Two reports of receipts and expenditures (form 3) for the years 1977 and 1978 were received at the Commission 1/10/80. Each report is marked termination except for a 3a postcard which was submitted for the period 1/1-3/31. As to the year of the postcard, it appears to be for 1979.

These reports are not attached because John Levin was given a copy of each report on 1/14/80.

The reports received are adequate except for a \$300 transfer discrepancy between the National American Party and the American Party of Florida. A request for addition information was written 1/16/80.

OUTCOME: (if applicable)

80010173529

*Commission unit which initiated original Referral (e.g. AUDIT/RAD/OGC).
**INFORMATION, or RESULTS OF RAD ACTION, as appropriate.

MUR
1029

MEMORANDUM

TO: File
FROM: Suzanne Callahan
DATE: 3 December 1979

Hal Ponder has advised me that he spoke with Samuel Fields today and advised him that we would send a photocopy of the close out letter for MUR 1029 which was mailed to him on November 16, 1979, and received by his office on November 19th. (receipt card signed and returned)

Mr. Fields was sent a photocopy on this date - certified mail, return receipt requested.

80010.73529

80010173330

PS Form 3811, Aug. 1978

● SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).
 Show to whom and date delivered. _____
 Show to whom, date, and address of delivery. _____
 RESTRICTED DELIVERY
 Show to whom and date delivered. _____
 RESTRICTED DELIVERY.
 Show to whom, date, and address of delivery. \$ _____
 (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
 Samuel A. Folds
 100 Maryland Ave, N.E.

3. ARTICLE DESCRIPTION:
 REGISTERED NO. _____ CERTIFIED NO. 43431 INSURED NO. _____
 (Always obtain signature of addressee or agent)

I have received the article described above.
 SIGNATURE: [Signature] Addressee Authorized agent

4. DATE OF DELIVERY: DEC 8 1979 POSTMARK: _____

5. ADDRESS (Complete only if requested): _____

6. UNABLE TO DELIVER BECAUSE: _____ CLERK'S INITIALS: _____

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

☆ GPO: 1979-872-662

Callahan MUR 1029

80040173531

MUR 1029

PS Form 3811, Apr 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

SENDER: Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse

- 1. The following service is requested (check one).
 - Show to whom and date delivered
 - Show to whom, date, and address of delivery
 - RESTRICTED DELIVERY Show to whom and date delivered
 - RESTRICTED DELIVERY Show to whom, date, and address of delivery (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Samuel A. Fields

3. ARTICLE DESCRIPTION:

REGISTERED NO	CERTIFIED NO	INSURED NO.
	44331	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE Addressee Authorized agent

4. DATE OF DELIVERY: *4-15-77* POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

8 0 0 4 0 1 7 3 3 8 9

8 0 0 4 0 1 7 3 5 3 2 0 0

3 0 0 4 0 1 7 3 3 8 9

MUR 1029

SENDER: Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.

- 1. The following service is requested (check one).
 - Show to whom and date delivered
 - Show to whom, date, and address of delivery
 - RESTRICTED DELIVERY Show to whom and date delivered
 - RESTRICTED DELIVERY Show to whom, date, and address of delivery \$ (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO: James J. Featherstone

3. ARTICLE DESCRIPTION: REGISTERED NO. CERTIFIED NO. INSURED NO.

(Always obtain signature of addressee or agent)

I have received the article described above. SIGNATURE Addressee Authorized agent

4. DATE OF DELIVERY: 11-21-79 POSTMARK: NOV 21 1979

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: 21 NOV 1979 CLERK'S INITIALS: S C

MUR 1029

SENDER: Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.

- 1. The following service is requested (check one).
 - Show to whom and date delivered
 - Show to whom, date, and address of delivery
 - RESTRICTED DELIVERY Show to whom and date delivered
 - RESTRICTED DELIVERY Show to whom, date, and address of delivery \$ (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO: Ms. Cathy Brooks

3. ARTICLE DESCRIPTION: REGISTERED NO. CERTIFIED NO. INSURED NO. 843309

(Always obtain signature of addressee or agent)

I have received the article described above. SIGNATURE Addressee Authorized agent

4. DATE OF DELIVERY: POSTMARK: NOV 21 1979

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

PS Form 3811, Apr 1977

RETURN RECEIPT, REGISTERED, INSURED, AND CERTIFIED MAIL

PS Form 3811, Apr 1977

RETURN RECEIPT, REGISTERED, INSURED, AND CERTIFIED MAIL



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 16, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Samuel A. Fields, Field Director
National Coalition to Ban Handguns
100 Maryland Avenue, N.E.
Washington, D.C. 20002

Re: MUR 1029

Dear Mr. Fields:

This is in reference to the complaint you filed with the Commission on September 10, 1979, concerning alleged violations of: (a) 2 U.S.C. § 432 (11 C.F.R. § 102) and § 441b (11 C.F.R. 114.2) by the National Rifle Association and (b) § 441b (11 C.F.R. 114.2) and § 434 (11 C.F.R. 104.3) by Congressman Wayne Grisham.

Based on information provided to the Commission, as well as a review of relevant disclosure reports, the Commission found no reason to believe that the NRA or Congressman Grisham had violated any provision of the Act.

The Commission did, however, find reason to believe that the Grisham for Congress Committee violated 2 U.S.C. § 434(b) of the Federal Election Campaign Act of 1971, as amended, and instituted an investigation of this matter. The information uncovered during this investigation led the Commission to conclude that it should take no further action in this matter in light of the fact that the committee did not have sufficient information with which to report receipt of the \$2,000 in-kind contribution at the time it occurred, but amended its reports immediately upon notification from the Commission.

Accordingly, the file in this matter numbered 1029 has been closed.

If you have any questions, please contact Suzanne Callahan, the staff member assigned to this matter, at (202) 523-4037.

Sincerely,

Charles N. Steele
Acting General Counsel

80040173534

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Samuel A. Fields, Field Director
National Coalition to Ban Handguns
100 Maryland Avenue, N.E.
Washington, D.C. 20002

11/16/79

Re: MUR 1029

Dear Mr. Fields:

This is in reference to the complaint you filed with the Commission on September 10, 1979, concerning alleged violations of: (a) 2 U.S.C. § 432 (11 C.F.R. § 102) and § 441b (11 C.F.R. 114.2) by the National Rifle Association and (b) § 441b (11 C.F.R. 114.2) and § 434 (11 C.F.R. 104.3) by Congressman Wayne Grisham.

Based on information provided to the Commission, as well as a review of relevant disclosure reports, the Commission found no reason to believe that the NRA or Congressman Grisham had violated any provision of the Act.

The Commission did, however, find reason to believe that the Grisham for Congress Committee violated 2 U.S.C. § 434(b) of the Federal Election Campaign Act of 1971, as amended, and instituted an investigation of this matter. The information uncovered during this investigation led the Commission to conclude that it should take no further action in this matter in light of the fact that the committee did not have sufficient information with which to report receipt of the \$2,000 in-kind contribution at the time it occurred, but amended its reports immediately upon notification from the Commission.

Accordingly, the file in this matter numbered 1029 has been closed.

If you have any questions, please contact Suzanne Callahan, the staff member assigned to this matter, at (202) 523-4037.

Sincerely,

W.C. Oldaker
~~William C. Oldaker~~
General Counsel

sl
~~BY: Charles N. Steele~~
Associate General Counsel
Acting

30010173535



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 16, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. James J. Featherstone, Treasurer
NRA Political Victory Fund
Institute for Legislative Action
Post Office Box 2019
Washington, D.C. 20013

Re: MUR 1029

Dear Mr. Featherstone:

It has come to the Commission's attention, through the course of an investigation, that the NRA Political Victory Fund failed to report an in-kind contribution to the treasurer of the Grisham for Congress Committee. (See attached correspondence).

Specifically, although you reported a \$2,000 expenditure in connection with the Grisham campaign on your 1978 pre-general election report, the recipient committee's treasurer was not informed of the contribution and consequently was unable to report receipt of it as required by § 434(b) (11 C.F.R. § 104.3). As set forth in that section of the Act, in-kind contributions in excess of \$100 shall be reported "on the appropriate schedule of receipts [and expenditures] and identified as to its nature and listed as an 'in-kind contribution.'"

Inherent in this reporting requirement, is the necessity for the donor to report its in-kind contribution to the recipient for its reporting purposes.

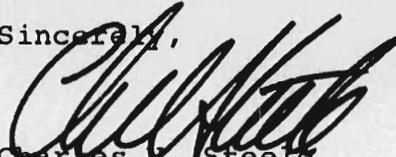
Please be advised that you are not a respondent in this matter. This notification is for informational purposes only.

80040173536

- 2 -

Should you have any questions or require further information regarding this matter, contact Suzanne Callahan at (202) 523-4037.

Sincerely,



Charles W. Steele
Acting General Counsel

Enclosure

80040173537

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. James J. Featherstone, Treasurer
NRA Political Victory Fund
Institute for Legislative Action
Post Office Box 2019
Washington, D.C. 20013

11/10/79

Re: MUR 1029

Dear Mr. Featherstone:

It has come to the Commission's attention, through the course of an investigation, that the NRA Political Victory Fund failed to report an in-kind contribution to the treasurer of the Grisham for Congress Committee. (See attached correspondence).

Specifically, although you reported a \$2,000 expenditure in connection with the Grisham campaign on your 1978 pre-general election report, the recipient committee's treasurer was not informed of the contribution and consequently was unable to report receipt of it as required by § 434(b) (11 C.F.R. § 104.3). As set forth in that section of the Act, in-kind contributions in excess of \$1,000 shall be reported "on the appropriate schedule of receipts [and expenditures] and identified as to its nature and listed as an 'in-kind contribution.'"

Inherent in this reporting requirement, is the necessity for the donor to report its in-kind contribution to the recipient for its reporting purposes.

Please be advised that you are not a respondent in this matter. This notification is for informational purposes only.

000107339

Should you have any questions or require further information regarding this matter, contact Suzanne Callahan at (202) 523-4529.

Sincerely,

~~William C. Oldaker~~
~~General Counsel~~

come
11/13

11/

~~BY~~ CHARLES N. STEELE
~~Associate~~ General Counsel

ACT:ng

Enclosure

80040173539



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 16, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Cathy Brooks
Treasurer
Grisham for Congress Committee
Post Office Box 26
La Mirado, California 90637

Re: MUR 1029

Dear Ms. Brooks:

The Commission has determined that based on the information provided in your letter of October 18, 1979, it will take no further action against the Grisham for Congress Committee's violation of 2 U.S.C. § 434(b).

Accordingly, the Commission has closed its file in this matter.

If you have any questions, please contact Suzanne Callahan at (202) 523-4037.

Sincerely,

A handwritten signature in cursive script, appearing to read "Charles N. Steele".

Charles N. Steele
Acting General Counsel

30040173540

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

11/16/79

Ms. Cathy Brooks
Treasurer
Grisham for Congress Committee
Post Office Box 26
La Mirado, California 90637

Re: MUR 1029

Dear Ms. Brooks:

The Commission has determined that based on the information provided in your letter of October 18, 1979, it will take no further action against the Grisham for Congress Committee's violation of 2 U.S.C. § 434(b).

Accordingly, the Commission has closed its file in this matter.

If you have any questions, please contact Suzanne Callahan at (202) 523-4037.

Sincerely,

~~William C. Oldaker~~
~~General Counsel~~

10/1
~~By:~~ Charles N. Steele
Associate General Counsel

ACT:ng

80040173541



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE *MWE*
FROM: MARJORIE W. EMMONS/MARGARET CHANEY *mc*
DATE: NOVEMBER 8, 1979
SUBJECT: MUR 1029 - COMMENTS REGARDING REMOVAL OF
NAME

Attached is a copy of Commissioner Reiche's
vote sheet with comments regarding the removal of the
former General Counsel's name from the proposed letters.

80040173542

ATTACHMENT:
Copy of Vote Sheet



FEDERAL ELECTION COMMISSION

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

Date and Time Transmitted: 11-6-79, 11:00

Commissioner FRIEDERSDORF, AIKENS, TIERNAN, MCGARRY, REICHE, HARRIS

RETURN TO OFFICE OF COMMISSION SECRETARY BY: THURSDAY, NOVEMBER 8, 1979

11:00

MUR No. 1029 - General Counsel's Report dated 10-26-79: Signed
11-2-79

I approve the recommendation

I object to the recommendation

COMMENTS: Again -- we must remove Oldaker's
name.

Date: 11/6/79

Signature: Frank P. Reiche

THE OFFICE OF GENERAL COUNSEL WILL TAKE NO ACTION IN THIS MATTER UNTIL THE APPROVAL OF FOUR COMMISSIONERS IS RECEIVED. PLEASE RETURN ALL PAPERS NO LATER THAN THE DATE AND TIME SHOWN ABOVE TO THE OFFICE OF COMMISSION SECRETARY. ONE OBJECTION PLACES THE ITEM ON THE EXECUTIVE SESSION AGENDA.



80040173543

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Grisham for Congress Committee) MUR 1029

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on November 8, 1979, the Commission decided by a vote of 6-0 to take the following actions in the above-captioned matter:

1. Take no further action against the Grisham for Congress Committee in connection with its violation of §434.
2. Send the notification letters to the Grisham for Congress Committee and the NRA Political Victory Fund (Attachments to the General Counsel's Report dated 10-26-79).
3. Close the file.

Voting for this determination were Commissioners Aikens, Friedersdorf, Harris, McGarry, Reiche, and Tiernan.

Attest:

11/9/79
Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

Received in Office of the Commission Secretary: 11-5-79, 1:45
Circulated on a 48 hour vote basis: 11-6-79, 11:00

30010173544

BEFORE THE FEDERAL ELECTION COMMISSION
October 26, 1979

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

79 NOV 5 P 1:45

In the Matter of)
) MUR 1029
Grisham for Congress Committee)

GENERAL COUNSEL'S REPORT

BACKGROUND

On October 9, 1979, the Commission, based upon a notarized complaint, found reason to believe that the Grisham for Congress Committee may have violated 2 U.S.C. § 434 for failure to report receipt of a \$2,000 in-kind contribution from the NRA Political Victory Fund.

ANALYSIS

According to reports filed with the Commission, the NRA Political Victory Fund expended \$2,000 in connection with the Grisham campaign by paying for the travel and living expenses of a Grisham volunteer campaign worker. The NRA Political Victory Fund correctly reported its \$2,000 expenditure as an in-kind contribution to the Grisham campaign in its 1978 pre general election report; the Grisham campaign failed to report receipt of the contribution.

On October 11, 1979, the Grisham campaign was notified of the Commission's reason to believe finding. Cathy Brooks, treasurer of the committee, responded to the Commission's notification by stating that she first became aware of the in-kind contribution upon receipt of the complaint which gave rise to this matter. Subsequent to receipt of the complaint, Ms. Brooks immediately filed amended reports which listed receipt of the in-kind contribution at issue.

80710173346

As set forth in 2 U.S.C. § 434 (11 C.F.R. § 104.3), in-kind contributions in excess of \$100 shall be reported "on the appropriate schedule of receipts [and expenditures] and identified as to its nature and listed as an 'in-kind contribution'". Inherent in this reporting requirement is the necessity for the contributor to report its in-kind contribution to the recipient committee in order that it have sufficient information with which to fulfill its reporting obligations. Although such responsibility is apparent, it is not specified in the Act or Regulations as being incumbent upon the donor.

Therefore, even though the NRA Political Victory Fund failed to advise the recipient committee of its in-kind contribution, it did report its expenditure to the Commission and has therefore not violated any provision of the Act.

Since the Grisham committee did not have sufficient information with which to report the in-kind contribution in a timely manner but reported it immediately upon being advised of the contribution, the Office of General Counsel recommends that the Commission take no further action with regard to the reporting violation. It is recommended that the Commission send the attached informational letter to the NRA Political Victory Fund advising the fund to report its in-kind contributions to the recipients in the future. 1/

1/ A memorandum setting forth the facts of this matter has been prepared for Pat Fiori, Assistant General Counsel for Regulations and Legislation, to advise her of this potential reporting problem in connection with in-kind contributions.

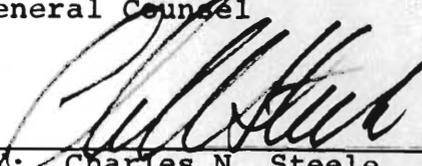
80040173547

RECOMMENDATIONS

This office recommends that the Commission:

1. take no further action against the Grisham for Congress Committee in connection with its violation of § 434;
2. send attached notification letters to the Grisham for Congress Committee and the NRA Political Victory Fund; and
3. close the file.

William C. Oldaker
General Counsel



BY: Charles N. Steele
Associate General Counsel

2 November 1979
Date

Attachments:

- Notifications letters to:
Grisham for Congress Committee
National Coalition to Bar Handguns
NRA Political Victory Fund

80040173549



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Cathy Brooks
Treasurer
Grisham for Congress Committee
Post Office Box 26
La Mirado, California 90637

Re: MUR 1029

Dear Ms. Brooks:

The Commission has determined that based on the information provided in your letter of October 18, 1979, it will take no further action against the Grisham for Congress Committee's violation of 2 U.S.C. § 434(b).

Accordingly, the Commission has closed its file in this matter.

If you have any questions, please contact Suzanne Callahan at (202) 523-4037.

Sincerely,

William C. Oldaker
General Counsel

BY: Charles N. Steele
Associate General Counsel

80040173549



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Samuel A. Fields, Field Director
National Coalition to Ban Handguns
100 Maryland Avenue, N.E.
Washington, D.C. 20002

Re: MUR 1029

Dear Mr. Fields:

This is in reference to the complaint you filed with the Commission on September 10, 1979, concerning alleged violations of: (a) 2 U.S.C. § 432 (11 C.F.R. § 102) and § 441b (11 C.F.R. 114.2) by the National Rifle Association and (b) § 441b (11 C.F.R. 114.2) and § 434 (11 C.F.R. 104.3) by Congressman Wayne Grisham.

Based on information provided to the Commission, as well as a review of relevant disclosure reports, the Commission found no reason to believe that the NRA or Congressman Grisham had violated any provision of the Act

The Commission did, however, find reason to believe that the Grisham for Congress Committee violated 2 U.S.C. § 434(b) of the Federal Election Campaign Act of 1971, as amended, and instituted an investigation of this matter. The information uncovered during this investigation led the Commission to conclude that it should take no further action in this matter in light of the fact that the committee did not have sufficient information with which to report receipt of the \$2,000 in-kind contribution at the time it occurred, but amended its reports immediately upon notification from the Commission.

Accordingly, the file in this matter numbered 1029 has been closed.

If you have any questions, please contact Suzanne Callahan, the staff member assigned to this matter, at (202) 523-4037.

Sincerely,

William C. Oldaker
General Counsel

BY: Charles N. Steele
Associate General Counsel

80040173550



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. James J. Featherstone, Treasurer
NRA Political Victory Fund
Institute for Legislative Action
Post Office Box 2019
Washington, D.C. 20013

Re: MUR 1029

Dear Mr. Featherstone:

It has come to the Commission's attention, through the course of an investigation, that the NRA Political Victory Fund failed to report an in-kind contribution to the treasurer of the Grisham for Congress Committee. (See attached correspondence).

Specifically, although you reported a \$2,000 expenditure in connection with the Grisham campaign on your 1978 pre-general election report, the recipient committee's treasurer was not informed of the contribution and consequently was unable to report receipt of it as required by § 434(b) (11 C.F.R. § 104.3). As set forth in that section of the Act, in-kind contributions in excess of \$100 shall be reported "on the appropriate schedule of receipts [and expenditures] and identified as to its nature and listed as an 'in-kind contribution.'"

Inherent in this reporting requirement, is the necessity for the donor to report its in-kind contribution to the recipient for its reporting purposes.

Please be advised that you are not a respondent in this matter. This notification is for informational purposes only.

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- 2 -

Should you have any questions or require further information regarding this matter, contact Suzanne Callahan at (202) 523-4529.

Sincerely,

William C. Oldaker
General Counsel

BY: CHARLES N. STEELE
Associate General Counsel

Enclosure

80040173552

COCH
11435

RECEIVED
FEDERAL ELECTION
COMMISSION

79 OCT 22 PM 12:59

October 18, 1979

William C. Oldaker
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

904659

Dear Mr. Oldaker,

In response to your letter regarding alleged violations of 2 U.S. C. 434 specifically that the Grisham for Congress Committee failed to report receipt of a \$2,000 in-kind contribution from the National Rifle Association Political Victory Fund, I have set forth below the facts which demonstrate the reasons why this matter should be dismissed:

- (1) The Grisham for Congress Committee became aware of the NRA in-kind contribution of \$2,000 upon receiving a copy of a complaint filed by the National Coalition to Ban Handguns against the NRA; this complaint did not involve the Grisham campaign but put the campaign on notice that an in-kind contribution was made.
- (2) Upon discovering that there had been an in-kind contribution, the Grisham for Congress Committee immediately amended its reports to reflect the contribution. (Please see the attached amendments and letter sent to both the Clerk of the House of Representatives and the Political Reform Division of the Secretary of State of California).

As I am sure the Commission is aware in-kind contributions are always potential reporting problems for any principal campaign committee unless the campaign is informed in a timely fashion as to the nature and value of the contribution.

The Grisham campaign has always and will continue to comply with not only the letter, but the spirit of the Federal Election Law.

Since the Committee properly reported the \$2,000 upon being informed of the contribution, it is my hope the Commission will close the matter.

Sincerely,
Cathy E. Brooks
Cathy Brooks,
Treasurer
Grishamfor Congress Committee
P.O. Box 26
La Mirada, CA 90637
ID #077216

12:32 PM 19 OCT 22

RECEIVED
GENERAL COUNSEL

80010173553

October 1, 1979

Clerk of the House of Representatives
Office of Records and Registration
Rm. 1036 - Longworth House Office Building
Washington, D.C. 20515

Gentlemen,

It has just come to my attention that the Grisham for Congress Committee received an in-kind contribution from the N.R.A. Political Victory Fund during the 1978 General election.

Enclosed please find an amendment for our 10th day report preceding the General election reporting this in-kind contribution and also amendments for the 30th day report following the general election and our year end report, making all the records correct.

I am sorry for the delay in reporting this, but as I said, I did not know that the in-kind contribution existed until just recently.

Sincerely,

Cathy Brooks,
Treasurer
Grisham for Congress Committee
P.O. Box 26
La Mirada, CA 90637
ID #077216

90010173554

October 1, 1979

Political Reform Division
Office of the Secretary of State
P.O. Box 1467
925 L Street
Sacramento, CA 95807

Gentlemen,

It has just come to my attention that the Grisham for Congress Committee received an in-kind contribution from the N.R.A. Political Victory Fund during the 1978 General election.

Enclosed please find an amendment for our 10th day report preceding the General election reporting this in-kind contribution and also amendments for the 30th day report following the general election and our yearend report, making all the records correct.

I am sorry for the delay in reporting this, but as I said, I didnot know that the in-kind contribution existed until just recently.

Sincerely,

Cathy Brooks,
Treasurer
Grisham for Congress Committee
P.O. Box 26
La Mirada, CA 90637
ID #077216

80010173555

REPORT OF RECEIPTS AND EXPENDITURES
 FOR A CANDIDATE OR COMMITTEE
 SUPPORTING CANDIDATE(S) FOR
 NOMINATION OR ELECTION TO FEDERAL OFFICE
 (Except for Candidates or Committees Receiving Federal Matching Funds)

Note: Committees authorized by a candidate to receive contributions and make expenditures in connection with more than one election must maintain separate records with respect to each election.

1 Crishan for Congress 2 I.D. No. 077216
 Name of Candidate or Committee (in full) Candidate/Committee
P.O. Box 26 3 Congress - 33rd District - California
 Address (number and street) Office Sought, State/District (if applicable)
La Mirada, CA 90637
 City, State and ZIP Code Check if address is different than previously reported. Year of Election 1978

4 Type of Report (check appropriate boxes)

April 10 Quarterly Report Tenth day report preceding _____ election (primary, general or convention) Termination Report

July 10 Quarterly Report on _____ in the State of _____ Amendment for 10th day report preceding General Election.

October 10 Quarterly Report Thirtieth day report following _____ election (primary, general or convention)

January 31 Annual Report

Monthly Report _____ on _____ in the State of _____ (month) (date)

This is a report for Primary Election General Election Primary and General Other (special, runoff, etc.)

SUMMARY OF RECEIPTS AND EXPENDITURES
 (Figures may be rounded to nearest dollar.)

5 Covering Period	Column A This Period	Column B Calendar Year To-Date
<u>10/1/78</u> Through <u>10/23/78</u>		
6 Cash on hand January 1, 19		\$ 0
7 Cash on hand at beginning of reporting period	\$ 15,315.11	
8 Total receipts (from line 19)	\$ 33,652.79	\$ 124,604.78
(a) Subtotal (Add lines 7 and 8 for Column A and lines 6 and 8 for Column B)	\$ 48,967.90	\$ 124,604.78
9 Total expenditures (from line 25)	\$ 42,987.94	\$ 118,624.81
10 Cash on hand at close of reporting period (Subtract line 9 from line 8a)	\$ 5,979.96	\$ 5,979.96
11 Value of contributed items on hand to be liquidated (Attach itemized list)	\$	
12 Debts and obligations owed to the Committee/Candidate (itemize all on Schedule C)	\$	
13 Debts and obligations owed by the Committee/Candidate (itemize all on Schedule C)	\$ 4,327.92	

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

10/23/78 Cathy Brooks, Treasurer Cathy E. Brooks
 (Date) (Typed Name of Treasurer or Candidate) (Signature of Treasurer or Candidate)

Note: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. Section 437, or Section 441, (see reverse side of form).

For further information, contact:  Federal Election Commission
 1325 K Street, N.W. or call 800/424-9530
 Washington, D.C. 20463 Approved by GAO
 B-187620 (R0566)
 Expires 3-31-81

All previous versions of FEC FORM 3 are obsolete and should no longer be used.

Any information reported herein may not be copied for sale or use by any person for purposes of soliciting contributions or for any commercial purpose.

DETAILED SUMMARY OF RECEIPTS AND EXPENDITURES
(Page 2, FEC FORM 3)

NAME OF CANDIDATE OR COMMITTEE

Grisham for Congress

REPORT COVERING THE PERIOD

FROM: 10/1/78 TO: 10/23/78

RECEIPTS

**Column A
This Period**

**Column B
Calendar Year-To-Date**

14. Contributions from Individuals (including contributions in-kind):

(a) Itemized (use Schedule A) \$ 4,869.78

(b) Unitemized \$ 2,341.00

(c) Sales and collections included above:

Less: by event on memo Schedule D (\$ _____)

(d) Subtotal of contributions from individuals \$ 7,210.78 \$ 40,194.48

15. Transfers from Political Committees:

(a) Funds from affiliated/authorized committee (Itemize on Schedule A regardless of amount) \$ 0

(b) Funds from other committees (Itemize on Schedule A regardless of amount) \$ 23,265.00

(c) Contributions in-kind from political committees (Itemize on Schedule A regardless of amount) \$ 3,177.01

(d) Subtotal of transfers in and contributions in-kind from political committees \$ 26,442.01 \$ 71,173.33

16. Other Income:

(a) Itemized (use Schedule A) \$ 0

(b) Unitemized \$ 0

(c) Subtotal of other income \$ 0 \$ 0

17. Loan and Loan Repayments Received:

(a) Itemized (use Schedule A) \$ 0

(b) Unitemized \$ 0

(c) Subtotal of loans and loan repayments received \$ 0 \$ 11,827.92

18. Refunds, Rebates, Returns of Deposits:

(a) Itemized (use Schedule A) \$ 0

(b) Unitemized \$ 0

(c) Subtotal of refunds, rebates, returns of deposits \$ 0 \$ 1,409.03

19. Total Receipts \$ 33,652.79 \$ 124,604.73

EXPENDITURES

20. Operating Expenditures:

(a) Itemized (use Schedule B) \$ 42,732.35

(b) Unitemized \$ 255.59

(c) Subtotal of operating expenditures \$ 42,987.94 \$ 110,624.82

21. Loans, Loan Repayments, and Contribution Refunds Made:

(a) Itemized (use Schedule B) \$ 0

(b) Unitemized \$ 0

(c) Subtotal of loans and loan repayments made and contribution refunds \$ 0 \$ 8,000.00

22. Transfers Out to Political Committees:

(a) To affiliated/authorized committee (Itemize on Schedule B regardless of amount) \$ 0

(b) To other committees (Itemize on Schedule B regardless of amount) \$ 0

(c) Contributions in-kind to other committees (Itemize on Schedule B regardless of amount) \$ 0

(d) Subtotal of transfers out \$ 0 \$ 0

23. Independent Expenditures (use Schedule E)

\$ 0 \$ 0

24. Coordinated Expenditures Made by Political Committees (2 U.S.C. 441a(d))

(Itemize on Schedule F) \$ 0 \$ 0

25. Total Expenditures \$ 42,987.94 \$ 118,624.82

**RECEIPTS AND EXPENDITURES,
NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES**

26. Total Receipts (from line 19) \$ 33,652.79

27. Transfers In (from line 15(a)) \$ 0

28. Net Receipts (Subtract line 27 from line 26) \$ 33,652.79

29. Total Expenditures (from line 25) \$ 42,987.94

30. Transfers Out (from line 22(a)) \$ 0

31. Net Expenditures (Subtract line 30 from line 29) \$ 42,987.94

(Contributions, Transfers, Contribution In-Kind
Other Income, Loans, Refunds)

Line Number 15c

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a
of FEC FORM 3

(Use Separate Schedules for
each numbered line)

Name of Candidate or Committee in Full			
Grisham for Congress			
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Committee for the Survival of a Free Congress 6 Library Court, S.E. Washington, D.C. 20003	Bob McAdam - Consulting Occupation	10/21/78	\$125.00 (IN KIND CONTRI- BUTION)
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed		
	Aggregate Year-To-Date ... \$ 125.00		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Congressional Leadership Committee 1900 M Street, N.W., Suite 500 Washington, D.C. 20036	Television & radio endorsements Occupation	9/26/79	\$192.00 (IN KIND CONTRI- BUTION)
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed		
	Aggregate Year-To-Date ... \$ 192.00		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Lincoln Club 819 So. New Hampshire Los Angeles, CA 90005	Salary - Doug Boyd \$500.00 Rototype Letter - IPS \$359.52 Occupation	10/15/78 10/23/78	\$500.00 \$359.52 (IN KIND CONTRI- BUTION)
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed		
	Aggregate Year-To-Date ... \$ 3,559.52		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
N.R.A. Political Victory Fund 1600 Rhode Island Ave., N.W. Washington, D.C. 20036	Kathy Royce - travel & living expenses to help on campaign Occupation	10/18/78	\$2,000.00 (IN KIND CONTRI- BUTION)
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed		
	Aggregate Year-To-Date ... \$ 4,000.00		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
	Occupation		
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed		
	Aggregate Year-To-Date ... \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
	Occupation		
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed		
	Aggregate Year-To-Date ... \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
	Occupation		
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed		
	Aggregate Year-To-Date ... \$		
SUBTOTAL of receipts on this page (optional)			\$
TOTAL this period (last page this line number only)			\$ 3,177.01

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SCHEDULE B

REVISED

January, 1978

Federal Election Commission

1325 K Street, N.W.

Washington, D.C. 20463

ITEMIZED EXPENDITURES

(Operating, Transfers Out, Contributions In-Kind, Loans, Loan Repayments and Refunds Made)

Supporting Lines 20a, 21a, and 22a, 22b, and 22c of FEC FORM 3

Page 5 of 5 for

Line Number 20a

(Use separate Schedules for each numbered line)

10173559

Name of Candidate or Committee in Full			
Grisham for Congress			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Committee for the Survival of a Free Congress 6 Library Court, S.E. Washington, D.C. 20003	Bob McAdam - Consulting	10/21/78	\$125.00 (IN KIND CONTRIB)
	Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		
Lincoln Club 819 So. New Hampshire Los Angeles, CA 90005	Salary - Doug Boyd \$500.00	10/15/78	\$500.00
	Rototype letter - IPS \$359.52	10/23/78	\$359.52
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		IN KIND CONTRIB
	Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)
Congressional Leadership Committee 1800 M Street, N.W., Suite 500 Washington, D.C. 20036	Television & radio endorsements	9/26/78	\$192.49 (IN KIND CONTRIB)
	Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		
N.E.A. Political Victory Fund 1809 Rhode Island Ave., N.W. Washington, D.C. 20036	Kathy Royce - travel & living expenses to help on campaign	10/12/78	\$2,500.00 IN KIND CONTRIB
	Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
	Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
SUSTOTAL of expenditures this page (optional)			\$ 3,177.01
TOTAL this period (last page this line number only)			\$42,732.35

Grisham for Congress Committee
P.O. Box 26
La Mirada, CA 90637



**RETURN RECEIPT
REQUESTED**

CERTIFIED

P00 8898561

MAIL

William C. Oldaker
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

OCT 22 PM 1 00
RECEIVED
FEDERAL ELECTION
COMMISSION

300107356



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 11, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. James J. Featherstone, Treasurer
National Rifle Association
1600 Rhode Island Avenue, N.W.
Washington, D.C. 20036

Re: MUR 1029

Dear Mr. Featherstone:

I am forwarding for your information the enclosed complaint which was received by the Commission.

The Commission has determined that on the basis of the information in the complaint there is no reason to believe that a violation of any statute within its jurisdiction has been committed by the National Rifle Association of America, Inc. Accordingly, the Commission intends to close its file on this matter as it pertains to NRA.

Sincerely,

William C. Oldaker
General Counsel

040173561

15 Form 3811, Apr 1977

MUR 1029 Complaint

SEND: Complete Form 1, 2, and 3 RETURN/DELIVER on the day you mail it to the FEDERAL ELECTION COMMISSION

1. The following service is requested (check one):
 Show to whom sent, date delivered, and address of delivery.
 RESTRICTED DELIVERY (Show to whom and date delivered) **OCT 19 AM 11:55**
 RESTRICTED DELIVERY (Show to whom, date, and address of delivery. \$ (CONSULT POSTMASTER FOR FEES))

2. ARTICLE ADDRESSED TO:
James J. Featherstone

3. ARTICLE DESCRIPTION:
REGISTERED NO. **94302** INSURED NO.

(Always obtain signature of addressee or agent)

I have received the article described above:
 SIGNATURE Addressee Authorized agent
James J. Featherstone

DATE OF DELIVERY _____ POSTMARK _____

5. ADDRESS (Complete only if requested) _____

6. UNABLE TO DELIVER BECAUSE: _____ CLERK'S INITIALS _____

★GPO 1977-0-249-595

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. James J. Featherstone, Treasurer
National Rifle Association
1600 Rhode Island Avenue, N.W.
Washington, D.C. 20036

Re: MUR 1029

Dear Mr. Featherstone:

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The Commission has determined that on the basis of the information in the complaint there is no reason to believe that a violation of any statute within its jurisdiction has been committed by the National Rifle Association of America, Inc. Accordingly, the Commission intends to close its file on this matter as it pertains to NRA.

Sincerely,

William C. Oldaker
General Counsel

Enclosure
Complaint

cah 9/25/79

80040173562

W.C.O.
10/11



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 11, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

The Honorable Wayne Grisham
House of Representatives
511 Cannon Building
Washington, D.C. 20515

Re: MUR 1029

Dear Mr. Grisham:

I am forwarding for your information the enclosed complaint which was received by the Commission.

The Commission has determined that on the basis of the information in the complaint there is no reason to believe that you, as a candidate, have committed a violation of any statute within its jurisdiction. Accordingly, the Commission intends to close its file on this matter as it pertains to you.

However, the Commission has found reason to believe that your principal campaign committee may have violated 2 U.S.C. § 434 for failure to report the receipt of an in-kind contribution. The notification letter which the Commission has sent to your committee is enclosed for your reference.

Should you have any questions, please direct them to Suzanne Callahan, the staff member assigned to this matter, at (202) 523-4529.

Sincerely,

A handwritten signature in cursive script, appearing to read "William C. Oldaker".

William C. Oldaker
General Counsel

Enclosures
Complaint
Notification Letter to Committee

80040173563

30040173564

MUR 1029

California

PS Form 3811, Apr. 1977

RETURN RECEIPT REGISTERED INSURED AND CERTIFIED MAIL

● SENDER Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).
- Show to whom and date delivered
 - Show to whom, date, and address of delivery
 - RESTRICTED DELIVERY
Show to whom and date delivered
 - RESTRICTED DELIVERY
Show to whom, date, and address of delivery \$
- (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO

The Honorable *Ed* Wayne Grisham

3. ARTICLE DESCRIPTION

REGISTERED NO.	CERTIFIED NO. <i>273055</i>	INSURED NO.
----------------	--------------------------------	-------------

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE Addressee Authorized agent

4. *B. May*

DATE OF DELIVERY *D*

POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

The Honorable Wayne Grisham
House of Representatives
511 Cannon Building
Washington, D.C. 20515

Re: MUR 1029

Dear Mr. Grisham:

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Should you have any questions, please direct them to Suzanne Callahan, the staff member assigned to this matter, at (202) 523-4529.

Sincerely,

W.C. Oldaker
10/11
William C. Oldaker
General Counsel

Enclosures
Complaint
Notification Letter to Committee

9/25/79 cah

80010173565



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 11, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Cathy Brooks, Treasurer
Grisham for Congress
6707 Bright Avenue
Whittier, California 90601

Re: MUR 1029

Dear Ms. Brooks:

The Federal Election Commission has received a complaint which alleges that the Grisham for Congress Committee has committed certain violations of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed.

We have numbered this matter MUR 1029. Please refer to this number in all future correspondence.

The Commission has reason to believe that the matters alleged in the complaint may state a violation of 2 U.S.C. § 434 (11 C.F.R. 104.3). Specifically, it appears that the committee has failed to report receipt of a \$2,000 in-kind contribution from the NRA Political Victory Fund. A copy of that portion of NRA's report which pertains to this matter is enclosed for your reference.

Under the Act, you have an opportunity to demonstrate that no action should be taken against your committee. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification. If no response is received, the Commission may take further action based on the information at hand.

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If you have any questions, please contact Suzanne Callahan, the staff member assigned to this matter, at (202) 523-4529.

This matter will remain confidential in accordance with 2 U.S.C. Section 437g(a) (3) (B) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,

William C. Oldaker
General Counsel

Enclosures
Complaint
Excerpt from NRA Report

3 7 1 0 1 7 3 5 6 7

1029 Personal

SENDER: Complete items 1, 2, and 3. RETURN TO: *SEE REVERSE*

1. The following service is requested (check or initial):

- Show to whom and date delivered.
- Show to whom, date, and address of delivery.
- RESTRICTED DELIVERY
- Show to whom and date delivered.
- RESTRICTED DELIVERY
- Show to whom, date, and address of delivery.

(CONSULT POSTMASTER FOR DETAILS)

2. ARTICLE ADDRESSED TO:
Ms. Cathy Brooks, Treasurer

3. ARTICLE DESCRIPTION: REGISTERED NO. 943054 INSURED NO. _____

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE Addressee Authorized agent

4. DATE OF DELIVERY 10-19-79

5. ADDRESS (Complete only if request for return to sender)

6. UNABLE TO DELIVER BECAUSE:

PS Form 3811, Apr. 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

6751 6751 6751

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Cathy Brooks, Treasurer
Grisham for Congress
6707 Bright Avenue
Whittier, California 90601

Re: MUR 1029

Dear Ms. Brooks:

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We have numbered this matter MUR 1029. Please refer to this number in all future correspondence.

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Under the Act, you have an opportunity to demonstrate that no action should be taken against your committee. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification. If no response is received, the Commission may take further action based on the information at hand.

8001017359

If you have any questions, please contact Suzanne Callahan, the staff member assigned to this matter, at (202) 523-4529.

This matter will remain confidential in accordance with 2 U.S.C. Section 437g(a)(3)(B) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,

William C. Oldaker
General Counsel

Enclosure
Complaint

9/25/79 cah

80040173569

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 1029
National Rifle Association of)
America, Inc.)
Grisham for Congress Committee)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on October 9, 1979, the Commission decided by a vote of 5-0 to take the following actions in the above-captioned matter:

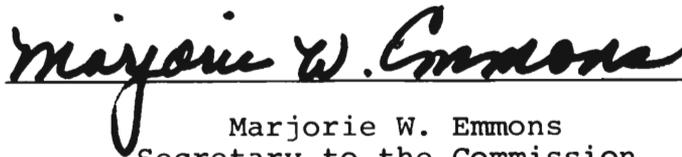
1. Find NO REASON TO BELIEVE that the National Rifle Association of America, Inc., has violated § 432 or § 441b.
2. Find NO REASON TO BELIEVE that Congressman Wayne Grisham has violated § 434 or § 441b.
3. Find REASON TO BELIEVE that the Grisham for Congress Committee may have violated § 434.
4. Send the notification letters attached to the First General Counsel's Report dated October 4, 1979.

Voting for this determination were Commissioners Aikens, Harris, McGarry, Reiche, and Tiernan.

Attest:

10/9/79

Date



Marjorie W. Emmons
Secretary to the Commission

Received in Office of the Commission Secretary: 10-4-79, 11:40
Circulated on 48 hour vote basis: 10-4-79, 4:00

80040173570

October 4, 1979

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 1029

Please have the attached First GC Report on MUR 1029 distributed to the Commission on a 48 hour tally basis.

Thank you.

80040173571

FEDERAL ELECTION COMMISSION

RECEIVED
OFFICE OF THE
GENERAL SECRETARY

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL
BY OGC TO COMMISSION 10-4-79

MUR NO 1029
DATE COMPLAINT RECEIVED
BY OGC 9/14/79

STAFF MEMBER(S) Callahan

COMPLAINANT'S NAME: Samuel S. Fields, Field Director
National Coalition to Ban Handguns

RESPONDENT'S NAME: National Rifle Association of America, Inc.
Grisham for Congress Committee

RELEVANT STATUTE: 2 U.S.C. § 432 (11 C.F.R. 102)
2 U.S.C. § 434 (11 C.F.R. 104.3)
2 U.S.C. § 441b (11 C.F.R. 114.2)

INTERNAL REPORTS CHECKED: NRA Political Victory Fund
Grisham for Congress Committee

FEDERAL AGENCIES CHECKED: None

SUMMARY OF ALLEGATIONS

On September 10, 1979, Samuel S. Fields, Field Director of the National Coalition to Ban Handguns, filed a complaint with the Commission alleging violations of the Act by the National Rifle Association of America, Inc., (NRA) 1/ and Congressman Wayne Grisham (CA/33). (Attachment I). Specifically, Fields alleges that: (a) the NRA has violated 2 U.S.C. § 432 (11 C.F.R. 102) and § 441b (11 C.F.R. 114.2) and (b) Congressman Grisham has violated § 441b (11 C.F.R. 114.2) and § 434 (11 C.F.R. 104.3).

EVIDENCE/ANALYSIS

According to the complainant, Kathryn Coe Royce, an employee of the NRA, worked from October 18 to November 2, 1978, for the campaign of Wayne Grisham. Mr. Fields contends that while Ms. Royce performed services for the campaign, she was on salary of the NRA. Although the NRA Political Victory Fund reports a \$2,000 expenditure for Ms. Royce's travel and lodging in connection with Grisham's campaign, there is no indication that the NRA Political Victory Fund reimbursed the NRA for Royce's salary during the time period in question.

1/ It should be noted that the NRA does have a political action committee, the National Rifle Association Political Victory Fund ("NRA Political Victory Fund") which is not a respondent in this MUR but is referred to in the text of this report.

80010173

Therefore, Fields alleges that the NRA's payment of Royce's salary was a contribution to a federal campaign requiring the NRA to register as a political committee pursuant to § 432 and further alleges that the NRA has made a corporate contribution in violation of § 441b by contributing Royce's salary to the Grisham campaign.

The NRA Political Victory Fund submitted information relevant to this inquiry by letter dated September 18, 1979. (Attachment II). James J. Featherstone, treasurer of the NRA Political Victory Fund, submitted copies of Royce's personnel records and time cards which indicate that Royce was not on salary of the NRA during the time she worked on Grisham's campaign but rather, she was on personal leave time. The NRA Political Victory Fund did pay Royce's expenses while she worked for Grisham and properly reported that amount as an in-kind contribution to the campaign.

There is no evidence to indicate that the NRA has violated § 432 or 441b; conversely, there is no evidence to indicate that Grisham accepted a contribution in violation of 441b requiring reporting under § 434.

As set forth in § 434 (11 C.F.R. 104.3), in-kind contributions in excess of \$100 shall be reported "on the appropriate schedule of receipts [and expenditures] and identified as to its nature and listed as an "in-kind contribution."

A review of the Grisham for Congress Committee reports indicate that although the NRA Political Victory Fund reported a \$2,000 in-kind contribution to the Grisham committee for Royce's travel and lodging on its pre-election report, the Grisham committee has not reported receipt of the contribution, a violation of § 434. It is recommended that the Commission find reason to believe that the Grisham for Congress Committee may have violated § 434.

RECOMMENDATIONS

1. Find no reason to believe that the National Rifle Association of America, Inc., has violated § 432 or § 441b.
2. Find no reason to believe that Congressman Wayne Grisham has violated § 434 or § 441b.
3. Find reason to believe that the Grisham for Congress Committee may have violated § 434.
4. Send attached notification letters.

Attachments

- I Complaint
- II September 18, 1979, letter from NRA Political Victory Fund
Notification letters to:
- III James J. Featherstone
- IV Cathy Brooks
- V The Honorable Wayne Grisham

GCC # 11092

MUR 1009

FEC ATTACHMENT I
5 pages

RECEIVED
SEP 12 1979
FEDERAL ELECTION COMMISSION

100 Maryland Avenue, N.E.
Washington, D.C. 20002
Phone: 544-7190 or 7191

FEDERAL ELECTION COMMISSION



national coalition to ban handguns

PT 12:37

MUR1029

Callahan

participating organizations

- American Civil Liberties Union
 - American Ethical Union
 - Americans for Democratic Action
 - American Jewish Congress
 - American Psychiatric Association
 - American Public Health Association
 - Black Women's Community Development Foundation
 - B'nai B'rith Women
 - Board of Church & Society, United Methodist Church
 - Center for Social Action, United Church of Christ
 - Church of the Brethren, Washington Office
 - Disarm Educational Fund
 - Friends Committee on National Legislation
 - International Ladies' Garment Workers Union
 - Jesuit Conference—Office of Social Ministries
 - National Alliance for Safer Cities
 - National Association of Social Workers
 - National Council of Jewish Women, Inc.
 - National Council of Negro Women
 - National Jewish Welfare Board
 - Political Action Committee, Woman's National Democratic Club
 - The Program Agency, United Presbyterian Church in the U.S.A.
 - Union of American Hebrew Congregations
 - Unitarian Universalist Association
 - United States Conference of Mayors
 - United States National Student Association
 - United Synagogue of America
 - Women's Division, Board of Global Ministries, United Methodist Church
 - Women's League for Conservative Judaism
 - Young Women's Christian Association of the U.S.A., National Board
- (partial listing)

September 10, 1979

Ms. Linda Newcomer
The Federal Elections Commission
1325 K Street, N.W.
Washington, D.C. 20463

Dear Ms. Newcomer:

As per our conversation, enclosed you will find the complaint and copies of material I didn't include.

Thank you very much.

Sincerely,


Sam Fields
Field Director

SF/jrj
/enclosures

30010173574





100 Maryland Avenue, N.E.
Washington, D.C. 20002
Phone: 544-7190 or 7191

national coalition to ban handguns

September 10, 1979

William C. Oldaker, Esquire
General Counsel
The Federal Elections Commission
1325 K Street, N.W.
Washington, D.C. 20463

Dear Sir:

Pursuant to 11 C.F.R. §111.2 (1978), I hereby file a complaint concerning an apparent indirect contribution by the National Rifle Association of America, Inc. ("NRA") to the campaign of Congressman Wayne Grisham of the 33rd District of California.

To the best of my knowledge, the facts are as follows:

From October 18, 1978 to November 2, 1978, Kathryn Coe Royce, an employee of National Rifle Association of America, Inc. performed services in aid of Mr. Grisham's campaign. These services were performed during the normal working hours of NRA, and she received a salary from NRA for this work. Apparently, the National Rifle Association Political Victory Fund (NRA Political Victory Fund) did not reimburse NRA for the salary paid to Ms. Royce. I attach hereto as Exhibit A a memorandum of a conversation between myself and Susan Reece, a lobbyist for NRA who works with Kathryn Royce, in which Ms. Reece stated that Ms. Royce was not on vacation during this period.

It further appears that Congressman Grisham did not report Ms. Royce's salary as a contribution. In addition, as set out in Exhibit B, the NRA Political Victory Fund expended two thousand dollars (\$2,000.00) for the travel and living expenses of Ms. Royce in aiding Mr. Grisham's campaign. Apparently, Mr. Grisham did not report this amount as a contribution.

Specifically, it appears that the National Rifle Association of American, Inc. violated the federal election laws as follows.

1. Within the definition set forth in 11 C.F.R. §100.14 (1978), NRA became a "political committee" when it contributed Ms. Royce's salary to Congressman Grisham's campaign. However, NRA did not comply with the provisions of 2 U.S.C.A. §432

participating organizations

- American Civil Liberties Union
- American Ethical Union
- Americans for Democratic Action
- American Jewish Congress
- American Psychiatric Association
- American Public Health Association
- Black Women's Community Development Foundation
- B'nai B'rith Women
- Board of Church & Society, United Methodist Church
- Center for Social Action, United Church of Christ
- Church of the Brethren, Washington Office
- Disarm Educational Fund
- Friends Committee on National Legislation
- International Ladies' Garment Workers Union
- Jesuit Conference—Office of Social Ministries
- National Alliance for Safer Cities
- National Association of Social Workers
- National Council of Jewish Women, Inc.
- National Council of Negro Women
- National Jewish Welfare Board
- Political Action Committee, Woman's National Democratic Club
- The Program Agency, United Presbyterian Church in the U.S.A.
- Union of American Hebrew Congregations
- Unitarian Universalist Association
- United States Conference of Mayors
- United States National Student Association
- United Synagogue of America
- Women's Division, Board of Global Ministries, United Methodist Church
- Women's League for Conservative Judaism
- Young Women's Christian Association of the U.S.A., National Board

(partial listing)

(1977) and 11 C.F.R. Part 102 (1978) concerning the registration and organization of a political committee.

- 2. The payment of Ms. Royce's salary by NRA constituted a "contribution" to the campaign of Congressman Grisham, as that phrase is defined in 11 C.F.R. §100.4 (1978). This contribution was in violation of 2 U.S.C.A. §441b (1977) and 11 C.F.R. §114.2 (1978).

It further appears that Congressman Grisham violated the federal election laws as follows:

- 1. The acceptance by Congressman Grisham of the services of Ms. Royce constituted the acceptance of a contribution in violation of 2 U.S.C.A. §441b (1977) and 11 C.F.R. §114.2(c) (1978).
- 2. Congressman Grisham failed to report the "in-kind" contribution of Ms. Royce's services as required by 2 U.S.C.A. §434 (1977) and 11 C.F.R. §104.3 (1978).
- 3. Congressman Grisham failed to report the "in-kind" contribution of \$2,000 for the travel and living expenses of Ms. Royce paid by the NRA Political Victory Fund as required by 2 U.S.C.A. §434 (1977) and 11 C.F.R. §104.3 (1978).

This complaint is not filed on behalf of or at the request or suggestion of a candidate.

I hereby swear and affirm that to the best of my knowledge, information and belief all of the foregoing facts and representations are true.

3004073576

9/16/79
(DATE)

Samuel S. Fields
Field Director

Appeared before me this 16th day of September, 1979, Mr. Samuel S. Fields who subscribed to the foregoing in my presence.

Arnold C. McCormick
Notary Public for the District of Columbia

My Commission Expires: January 1, 1981

cc: Mr. Thomas E. Harris, Chairman
Mr. John D. Aikens, Vice Chairman
Mr. Orlando B. Potter, Staff Dir.
The Federal Elections Commission
1325 K Street, N.W.
Washington, D.C. 20463

- Henry R. Lord, Esquire
Piper and Morbury
1100 Charles Center South
36 South Charles Street
Baltimore, Maryland 21201

REVISED

January, 1978
Federal Election Commission
1375 K Street, N.W.
Washington, D.C. 20463

ITEMIZED EXPENDITURES

(Operating, Transfers Out, Contributions In-Kind,
Loans, Loan Repayments and Refunds Made)
Supporting Lines 20a, 21a, and 22a, 22b, and 22c
of FEC FORM 3

Page 1 of 1 for
Line Number 22c

(Use Separate Schedules for
each numbered line)

Name of Candidate or Committee in Full

NRA POLITICAL VICTORY FUND

Full Name, Mailing Address and ZIP Code
Kathryn Coe Royce

Particulars of Expenditure
Travel to Los Angeles and
Living Exp. to aid campaign
of Wayne Grisham CA - 33

Date (month,
day, year)
10/18/78

Amount of each expendi-
ture this period
\$ 2,000.00

Expenditure for
 Primary General Other

Full Name, Mailing Address and ZIP Code
National Creative Printing,
Inc.

Particulars of Expenditure
Printing Postcards for mailing
of Charles Dougherty PA - 4

Date (month,
day, year)
10/19/78

Amount of each expendi-
ture this period
60.18

Expenditure for
 Primary General Other

Full Name, Mailing Address and ZIP Code

Particulars of Expenditure

Date (month,
day, year)

Amount of each expendi-
ture this period

Expenditure for
 Primary General Other

Full Name, Mailing Address and ZIP Code

Particulars of Expenditure

Date (month,
day, year)

Amount of each expendi-
ture this period

Expenditure for
 Primary General Other

Full Name, Mailing Address and ZIP Code

Particulars of Expenditure

Date (month,
day, year)

Amount of each expendi-
ture this period

Expenditure for
 Primary General Other

Full Name, Mailing Address and ZIP Code

Particulars of Expenditure

Date (month,
day, year)

Amount of each expendi-
ture this period

Expenditure for
 Primary General Other

Full Name, Mailing Address and ZIP Code

Particulars of Expenditure

Date (month,
day, year)

Amount of each expendi-
ture this period

Expenditure for
 Primary General Other

Full Name, Mailing Address and ZIP Code

Particulars of Expenditure

Date (month,
day, year)

Amount of each expendi-
ture this period

Expenditure for
 Primary General Other

SUBTOTAL of expenditures this page (optional)

\$ 2,060.18

30040171577
7805015451



100 Maryland Avenue, N.E.
Washington, D.C. 20002
Phone: 544-7190 or 7191

national coalition to ban handguns

M E M O R A N D U M

DATE: November 2, 1978

RE: Phone conversation between Sam Fields and Susan Reece.

Susan Reece stated that Kathryn Coe Royce was in California working on a campaign and not on vacation. She indicated that she would return to the office on Wednesday, November 8th.

80040173573

participating organizations

- American Civil Liberties Union
 - American Ethical Union
 - Americans for Democratic Action
 - American Jewish Congress
 - American Psychiatric Association
 - American Public Health Association
 - Black Women's Community Development Foundation
 - B'nai B'rith Women
 - Board of Church & Society, United Methodist Church
 - Center for Social Action, United Church of Christ
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 - National Alliance for Safer Cities
 - National Association of Social Workers
 - National Council of Jewish Women, Inc.
 - National Council of Negro Women
 - National Jewish Welfare Board
 - Political Action Committee, Woman's National Democratic Club
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 - Union of American Hebrew Congregations
 - Unitarian Universalist Association
 - United States Conference of Mayors
 - United States National Student Association
 - United Synagogue of America
 - Women's Division, Board of Global Ministries, United Methodist Church
 - Women's League for Conservative Judaism
 - Young Women's Christian Association of the U.S.A., National Board
- (partial listing)



NRA Political Victory Fund

Institute for Legislative Action
P.O. Box 2019, Washington, D.C. 20013

RECEIVED
OFFICE OF THE
GENERAL COUNSEL

1024 Callahan
GCC # 11139

Callahan

FEC ATTACHMENT II
4 pages

19 SEP 19 9 51

September 18, 1979

Mr. William C. Oldaker
General Counsel
Federal Election Commission
1325 K Street, NW
Washington, DC 20463

Dear Mr. Oldaker:

Thank you for releasing a copy of the complaint filed against the National Rifle Association of America by the National Coalition to Ban Handguns. One Samuel S. Fields has accused the NRA of making illegal corporate contributions to the campaign of Congressman Wayne Grisham of California. The accusation is false.

An employee of the NRA, Ms. Kathryn Coe Royce, worked in the Grisham campaign office from October 18 to November 2, 1978. She was a volunteer serving on personal leave time as verified by our computer personnel records and time cards, copies of which are enclosed. Her travel and living expenses were properly paid by the NRA Political Victory Fund and reported in our 10 Day Pre-General 1978 election report as an in-kind contribution to the Grisham campaign.

The statement attributed to Susan Recce of this office was in error. Ms. Royce was on personal leave not only for the campaign period noted above but also for a period of time thereafter. Please advise if further information is desired.

Sincerely,

James J. Featherstone
James J. Featherstone
Treasurer

JJF:jmb

30010173577

NATIONAL RIFLE ASSOCIATION

/21/78

VACATION AND SICK LEAVE REPORT - DEPT EA0700

PAGE 8

EMPLOYEE HISTORY				TOTAL				VACATION AND SICK HOURS						
ID NUMBER	NAME SOC SEC #	T C	HIRE DATE	LOS YY MM	REGULAR CUR	HOURS YTD	WEEK ENDING	PRIOR BAL	CUR USED	YTD USED	CUR ERND	YTD ERND	NEW BAL	FLAGS
A07000006	AQUILINO 579-62-1041	P	10/26/76	02-00	75.00	225.00 225.00	VAC. 09/23/78 SICK	140.00		52.50	6.50	19.50	146.50	
A07000008	BACCHI 200-42-6255	P	01/31/77	01-09	80.00	319.50 319.50	VAC. 10/21/78 SICK	56.00	1.00	2.00	6.50	26.00	61.50	
A07000021	DOWLUT 314-46-8382	X	06/20/77	01-04	37.50	162.75 162.75	VAC. SICK							
A07000080	BOYCE 577-74-5978	P	10/11/73	05-00	75.00	375.00 375.00	VAC. 10/21/78 SICK	121.00	97.50	117.00	8.50	26.00	30.00	
A07000103	GORZKOWSKI 201-26-8153	P	02/07/77	01-08	75.00	300.00 300.00	VAC. 10/21/78 SICK	99.00	7.50	7.50	6.50	26.00	98.00	
A07000105	GRAY 289-18-2126	P	06/01/76	02-04	45.00	240.00 240.00	VAC. 10/21/78 SICK	587.25	30.00	52.50	6.50	26.00	623.75	
A07000115	HINDLEY 218-56-5349	P	04/29/77	01-06	75.00	300.00 300.00	VAC. 09/09/78 SICK 10/21/78	63.00	7.50	15.00	6.50	26.00	62.00	
A07000128	JENNISON 579-62-9833	P	09/16/75	03-01	75.00	75.00 300.00	VAC. 10/21/78 SICK	47.75	2.00	9.50	6.50	26.00	52.25	
A07000130	JOHNSON 108-16-8890	P	12/19/77	00-10	79.00	312.50 312.50	VAC. 10/21/78 SICK 10/21/78	52.50	3.50 1.00	23.00 1.00	6.50	26.00	54.50	
A07000149	LASHBROOK 107-44-4626	P	01/05/76	02-09	75.00	247.50 247.50	VAC. 10/21/78 SICK 09/09/78	403.50	3.50	49.00 15.50	6.50	26.00	406.50	
A07000150	LATTANZIO 186-38-2471	P	01/12/76	02-09	68.00	278.00 278.00	VAC. 10/21/78 SICK	543.25	11.50	75.00	6.50	26.00	538.25	
A07000162	MCGAFFIN 118-07-3939	P	05/27/75	03-05	75.00	300.00 300.00	VAC. 10/07/78 SICK	388.50		7.50	6.50	26.00	395.00	
A07000165	METAKSA 040-30-1735	P	03/21/77	01-07	75.00	272.50	VAC. 10/07/78	613.75		7.00	6.50	26.00	620.25	

No. 30010

Name Kathryn Coe Royce

75 Hours Leave

SIMPLEX 8-200711

DATE	IN	OUT	IN	OUT	IN	OUT
16						
17						
18						
19						
20						
21						
22						
23						
24						
25						
26						
27						
28						
29						
30						
31						

Approved by: H. R. McCallie
Fiscal Officer

Check No. 03996
d.H. 10/10/78

OVERTIME		HOURS	
R. T.		WORKED	75
O. T.		ABSENT	
TOTAL		TOTAL	75

5 NO. ?

Name Kathryn Coe Royce

22 1/2 Hours Leave

SIMPLEX 8-200711

DATE	IN	OUT	IN	OUT	IN	OUT
16						
17						
18						
19						
20						
21						
22						
23						
24						
25						
26						
27						
28						
29						
30						
31						

Approved by: H. R. McCallie
Fiscal Officer

Check No. 03995
d.H. 10/10/78

OVERTIME		HOURS	
R. T.		WORKED	5 1/2
O. T.		ABSENT	22 1/2
TOTAL		TOTAL	27 1/2



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. James J. Featherstone, Treasurer
National Rifle Association
1600 Rhode Island Avenue, N.W.
Washington, D.C. 20036

Re: MUR 1029

Dear Mr. Featherstone:

I am forwarding for your information the enclosed complaint which was received by the Commission.

The Commission has determined that on the basis of the information in the complaint there is no reason to believe that a violation of any statute within its jurisdiction has been committed by the National Rifle Association of America, Inc. Accordingly, the Commission intends to close its file on this matter as it pertains to NRA.

Sincerely,

William C. Oldaker
General Counsel

Enclosure
Complaint

80010173583



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Cathy Brooks, Treasurer
Grisham for Congress
6707 Bright Avenue
Whittier, California 90601

Re: MUR 1029

Dear Ms. Brooks:

The Federal Election Commission has received a complaint which alleges that the Grisham for Congress Committee has committed certain violations of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed.

We have numbered this matter MUR 1029. Please refer to this number in all future correspondence.

The Commission has reason to believe that the matters alleged in the complaint may state a violation of 2 U.S.C. § 434 (11 C.F.R. 104.3). Specifically, it appears that the committee has failed to report receipt of a \$2,000 in-kind contribution from the NRA Political Victory Fund. A copy of that portion of NRA's report which pertains to this matter is enclosed for your reference.

Under the Act, you have an opportunity to demonstrate that no action should be taken against your committee. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification. If no response is received, the Commission may take further action based on the information at hand.

80040173584

If you have any questions, please contact Suzanne Callahan, the staff member assigned to this matter, at (202) 523-4529.

This matter will remain confidential in accordance with 2 U.S.C. Section 437g(a)(3)(B) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,

William C. Oldaker
General Counsel

Enclosures
Complaint
Excerpt from NRA Report

80040173585



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

The Honorable Wayne Grisham
House of Representatives
511 Cannon Building
Washington, D.C. 20515

Re: MUR 1029

Dear Mr. Grisham:

I am forwarding for your information the enclosed complaint which was received by the Commission.

The Commission has determined that on the basis of the information in the complaint there is no reason to believe that you, as a candidate, have committed a violation of any statute within its jurisdiction. Accordingly, the Commission intends to close its file on this matter as it pertains to you.

However, the Commission has found reason to believe that your principal campaign committee may have violated 2 U.S.C. § 434 for failure to report the receipt of an in-kind contribution. The notification letter which the Commission has sent to your committee is enclosed for your reference.

Should you have any questions, please direct them to Suzanne Callahan, the staff member assigned to this matter, at (202) 523-4529.

Sincerely,

William C. Oldaker
General Counsel

Enclosures
Complaint
Notification Letter to Committee

80040173595

September 27, 1979

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 1029

Please withdrawn from 48 hour circulation the First General Counsel's Report on MUR 1029. A revised report will be circulated as soon as possible.

Thankyou.

80010173587

September 26, 1979

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 1029

Please have the attached First GC Report on MUR 1029 distributed to the Commission on a 48 hour tally basis.

Thankyou.

87049173383

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL
BY OGC TO COMMISSION 9-26-79

MUR NO. 1029
DATE COMPLAINT RECIEVED
BY OGC 9/14/79

STAFF MEMBER(S) Callahan

COMPLAINANT'S NAME: Samuel S. Fields, Field Director
National Coalition to Ban Handguns

RESPONDENT'S NAME: National Rifle Association of America, Inc.
Grisham for Congress Committee

RELEVANT STATUTE: 2 U.S.C. § 432 (11 C.F.R. 102)
2 U.S.C. § 434 (11 C.F.R. 104.3)
2 U.S.C. § 441b (11 C.F.R. 114.2)

INTERNAL REPORTS CHECKED: NRA Political Victory Fund
Grisham for Congress Committee

FEDERAL AGENCIES CHECKED: None

79 SEP 27 A 7: 37
COMMISSION SECRETARY

SUMMARY OF ALLEGATIONS

On September 10, 1979, Samuel S. Fields, Field Director of the National Coalition to Ban Handguns, filed a complaint with the Commission alleging violations of the Act by the National Rifle Association of America, Inc., (NRA) 1/ and Congressman Wayne Grisham (CA/33). Specifically, Fields alleges that: (a) the NRA has violated 2 U.S.C. § 432 (11 C.F.R. 102) and § 441b (11 C.F.R. 114.2) and (b) Congressman Grisham has violated § 441b (11 C.F.R. 114.2) and § 434 (11 C.F.R. 104.3). (Attachment I)

EVIDENCE/ANALYSIS

According to the complainant, Kathryn Coe Royce, an employee of the NRA, worked from October 18 to November 2, 1978, for the campaign of Wayne Grisham. Mr. Fields contends that while Ms. Royce performed services for the campaign, she was on salary of the NRA. Although the NRA Political Victory Fund reports a \$2,000 expenditure for Ms. Royce's travel and lodging in connection with Grisham's campaign, there is no indication that the NRA Political Victory Fund reimbursed the NRA for Royce's salary during the time period in question.

1/ It should be noted that the NRA does have a political action committee, the National Rifle Association Political Victory Fund ("NRA Political Victory Fund") which is not a respondent in this MUR but is referred to in the text of this report.

Therefore, Fields alleges that the NRA's payment of Royce's salary was a contribution to a federal campaign requiring the NRA to register as a political committee pursuant to § 432 and further alleges that the NRA has made a corporate contribution in violation of § 441b by contributing Royce's salary to the Grisham campaign.

The NRA Political Victory Fund submitted information relevant to this inquiry by letter dated September 18, 1979. (Attachment II). James J. Featherstone, treasurer of the NRA Political Victory Fund, submitted copies of Royce's personnel records and time cards which indicate that Royce was not on salary of the NRA during the time she worked on Grisham's campaign but rather, she was on personal leave time. The NRA Political Victory Fund did pay Royce's expenses while she worked for Grisham and properly reported that amount as an in-kind contribution to the campaign.

There is no evidence to indicate that the NRA has violated § 432 or 441b; conversely, there is no evidence to indicate that Grisham accepted a contribution in violation of 441b requiring reporting under § 434.

As set forth in § 434 (11 C.F.R. 104.3), in-kind contributions in excess of \$100 shall be reported "on the appropriate schedule of receipts [and expenditures] and identified as to its nature and listed as an "in-kind contribution."

A review of the Grisham for Congress Committee reports indicate that although the NRA Political Victory Fund reported a \$2,000 in-kind contribution to the Grisham committee for Royce's travel and lodging on its pre-election report, the Grisham Committee has not reported receipt of the contribution, a violation of § 434. It is recommended that the Commission find reason to believe that the Grisham for Congress Committee may have violated § 434.

RECOMMENDATIONS

1. Find no reasonable cause to believe that the National Rifle Association of America, Inc., has violated § 432 or § 441b.
2. Find no reasonable cause to believe that Congressman Wayne Grisham has violated § 434 or § 441b.
3. Find reason to believe that the Grisham for Congress Committee may have violated § 434.
4. Send attached notification letters.

ATTACHMENTS

Complaint

September 18, 1979, letter from NRA Political Victory Fund

Notification letters to:

James J. Featherstone

Cathy Brooks

The Honorable Wayne Grisham



100 Maryland Avenue, N.E.
Washington, D.C. 20002
Phone: 544-7190 or 7191

ATTACHMENT I
5 pages

MUR 1029
FED ELECTION
MURKIN

RECEIVED
SEP 12 1975
FEDERAL COURTS

national coalition to ban handguns : 12:37

MUR 1029
Callahan

September 10, 1979

Ms. Linda Newcomer
The Federal Elections Commission
1325 K Street, N.W.
Washington, D.C. 20463

Dear Ms. Newcomer:

As per our conversation, enclosed you will find the complaint and copies of material I didn't include.

Thank you very much.

Sincerely,

Sam Fields
Field Director

SF/jrj
/enclosures

3004073591

participating organizations

- American Civil Liberties Union
 - American Ethical Union
 - Americans for Democratic Action
 - American Jewish Congress
 - American Psychiatric Association
 - American Public Health Association
 - Black Women's Community Development Foundation
 - B'nai B'rith Women
 - Board of Church & Society
 - United Methodist Church
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 - Young Women's Christian Association of the U.S.A., National Board
- (partial listing)





100 Maryland Avenue, N.E.
Washington, D.C. 20002
Phone 544-7190 or 7191

national coalition to ban handguns

September 10, 1979

William C. Oldaker, Esquire
General Counsel
The Federal Elections Commission
1325 K Street, N.W.
Washington, D.C. 20463

Dear Sir:

Pursuant to 11 C.F.R. §111.2 (1978), I hereby file a complaint concerning an apparent indirect contribution by the National Rifle Association of America, Inc. ("NRA") to the campaign of Congressman Wayne Grisham of the 33rd District of California.

To the best of my knowledge, the facts are as follows:

From October 18, 1978 to November 2, 1978, Kathryn Coe Royce, an employee of National Rifle Association of America, Inc. performed services in aid of Mr. Grisham's campaign. These services were performed during the normal working hours of NRA, and she received a salary from NRA for this work. Apparently, the National Rifle Association Political Victory Fund (NRA Political Victory Fund) did not reimburse NRA for the salary paid to Ms. Royce. I attach hereto as Exhibit A a memorandum of a conversation between myself and Susan Reece, a lobbyist for NRA who works with Kathryn Royce, in which Ms. Reece stated that Ms. Royce was not on vacation during this period.

It further appears that Congressman Grisham did not report Ms. Royce's salary as a contribution. In addition, as set out in Exhibit B, the NRA Political Victory Fund expended two thousand dollars (\$2,000.00) for the travel and living expenses of Ms. Royce in aiding Mr. Grisham's campaign. Apparently, Mr. Grisham did not report this amount as a contribution.

Specifically, it appears that the National Rifle Association of American, Inc. violated the federal election laws as follows.

1. Within the definition set forth in 11 C.F.R. §100.14 (1978), NRA became a "political committee" when it contributed Ms. Royce's salary to Congressman Grisham's campaign. However, NRA did not comply with the provisions of 2 U.S.C.A. §432

participating organizations

- American Civil Liberties Union
- American Ethical Union
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- American Jewish Congress
- American Psychiatric Association
- American Public Health Association
- Black Women's Community Development Foundation
- B'nai B'rith Women
- Board of Church & Society, United Methodist Church
- Center for Social Action, United Church of Christ
- Church of the Brethren, Washington Office
- Disarm Educational Fund
- Friends Committee on National Legislation
- International Ladies' Garment Workers Union
- Jesuit Conference—Office of Social Ministries
- National Alliance for Safer Cities
- National Association of Social Workers
- National Council of Jewish Women, Inc.
- National Council of Negro Women
- National Jewish Welfare Board
- Political Action Committee, Woman's National Democratic Club
- The Program Agency, United Presbyterian Church in the U.S.A.
- Union of American Hebrew Congregations
- Unitarian Universalist Association
- United States Conference of Mayors
- United States National Student Association
- United Synagogue of America
- Women's Division, Board of Global Ministries, United Methodist Church
- Women's League for Conservative Judaism
- Young Women's Christian Association of the U.S.A., National Board

(partial listing)



REVISED

January, 1978

Federal Election Commission

1325 K Street, N.W.

Washington, D.C. 20463

ITEMIZED EXPENDITURES

(Operating, Transfers Out, Contributions In-Kind, Loans, Loan Repayments and Refunds Made) Supporting Lines 20a, 21a, and 22a, 22b, and 22c of FEC FORM 3

Page 1 of 1 for Line Number 22c

(Use Separate Schedules for each numbered line)

Name of Candidate or Committee in Full

NRA POLITICAL VICTORY FUND

Full Name, Mailing Address and ZIP Code
Kathryn Coe Royce

Particulars of Expenditure
Travel to Los Angeles and Living Exp. to aid campaign of Wayne Grisham CA - 33

Date (month, day, year)
10/18/78

Amount of each expenditure this period
\$ 2,000.00

Expenditure for
 Primary General Other

Full Name, Mailing Address and ZIP Code
National Creative Printing, Inc.

Particulars of Expenditure
Printing Postcards for mailing of Charles Dougherty PA - 4

Date (month, day, year)
10/19/78

Amount of each expenditure this period
60.18

Expenditure for
 Primary General Other

Full Name, Mailing Address and ZIP Code

Particulars of Expenditure

Date (month, day, year)

Amount of each expenditure this period

Expenditure for
 Primary General Other

Full Name, Mailing Address and ZIP Code

Particulars of Expenditure

Date (month, day, year)

Amount of each expenditure this period

Expenditure for
 Primary General Other

Full Name, Mailing Address and ZIP Code

Particulars of Expenditure

Date (month, day, year)

Amount of each expenditure this period

Expenditure for
 Primary General Other

Full Name, Mailing Address and ZIP Code

Particulars of Expenditure

Date (month, day, year)

Amount of each expenditure this period

Expenditure for
 Primary General Other

Full Name, Mailing Address and ZIP Code

Particulars of Expenditure

Date (month, day, year)

Amount of each expenditure this period

Expenditure for
 Primary General Other

Full Name, Mailing Address and ZIP Code

Particulars of Expenditure

Date (month, day, year)

Amount of each expenditure this period

Expenditure for
 Primary General Other

SUBTOTAL of expenditures this page (optional)

\$ 2,060.18

7805017350



100 Maryland Avenue, N.E.
Washington, D.C. 20002
Phone: 544-7190 or 7191

national coalition to ban handguns

M E M O R A N D U M

DATE: November 2, 1978

RE: Phone conversation between Sam Fields and Susan Reece.

Susan Reece stated that Kathryn Coe Royce was in California working on a campaign and not on vacation. She indicated that she would return to the office on Wednesday, November 8th.

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participating organizations

- American Civil Liberties Union
- American Ethical Union
- Americans for Democratic Action
- American Jewish Congress
- American Psychiatric Association
- American Public Health Association
- Black Women's Community Development Foundation
- B'nai Brith Women
- Board of Church & Society, United Methodist Church
- Center for Social Action, United Church of Christ
- Church of the Brethren, Washington Office
- Disarm Educational Fund
- Friends Committee on National Legislation
- International Ladies' Garment Workers Union
- Jesuit Conference—Office of Social Ministries
- National Alliance for Safer Cities
- National Association of Social Workers
- National Council of Jewish Women, Inc.
- National Council of Negro Women
- National Jewish Welfare Board
- Political Action Committee, Woman's National Democratic Club
- The Program Agency, United Presbyterian Church in the U.S.A.
- Union of American Hebrew Congregations
- Unitarian Universalist Association
- United States Conference of Mayors
- United States National Student Association
- United Synagogue of America
- Women's Division, Board of Global Ministries, United Methodist Church
- Women's League for Conservative Judaism
- Young Women's Christian Association of the U.S.A., National Board

(partial listing)



NRA
Political Victory Fund

Institute for Legislative Action
P.O. Box 2019, Washington, D.C. 20013

ROUTED
OFFICE OF THE
GENERAL COUNSEL

GCC # 11139

Callahan

19 SEP 19 A 9: 51

September 18, 1979

Mr. William C. Oldaker
General Counsel
Federal Election Commission
1325 K Street, NW
Washington, DC 20463

Dear Mr. Oldaker:

Thank you for releasing a copy of the complaint filed against the National Rifle Association of America by the National Coalition to Ban Handguns. One Samuel S. Fields has accused the NRA of making illegal corporate contributions to the campaign of Congressman Wayne Grisham of California. The accusation is false.

An employee of the NRA, Ms. Kathryn Coe Royce, worked in the Grisham campaign office from October 18 to November 2, 1978. She was a volunteer serving on personal leave time as verified by our computer personnel records and time cards, copies of which are enclosed. Her travel and living expenses were properly paid by the NRA Political Victory Fund and reported in our 10 Day Pre-General 1978 election report as an in-kind contribution to the Grisham campaign.

The statement attributed to Susan Recce of this office was in error. Ms. Royce was on personal leave not only for the campaign period noted above but also for a period of time thereafter. Please advise if further information is desired.

Sincerely,

James J. Featherstone
James J. Featherstone
Treasurer

JJF:jmb

30040173596

3 0 0 4 0 1 7 3 5 9 7

NATIONAL RIFLE ASSOCIATION

21/78

VACATION AND SICK LEAVE REPORT - DEPT EA0700

PAGE 8

EMPLOYEE HISTORY				TOTAL		VACATION AND SICK HOURS								
IP NUMBER	NAME SOC SEC #	T C	HIRE DATE	LOS YY MM	REGULAR CUR	HOURS YTD	WEEK ENDING	PRIOR BAL	CUR USED	YTD USED	CUR ERND	YTD ERND	NEW BAL	FLAGS
07000006	AQUILINO 579-62-1041	P	10/26/76	02-00	75.00	225.00 225.00	VAC. 09/23/78 SICK	140.00		52.50	6.50	19.50	146.50	
07000008	BACCHI 200-42-6255	P	01/31/77	01-09	80.00	319.50 319.50	VAC. 10/21/78 SICK	56.00	1.00	2.00	6.50	26.00	61.50	
07000021	DOWLUT 314-46-8382	X	06/20/77	01-04	37.50	162.75 162.75	VAC. SICK							
07000080	ROYCE 577-74-5978	P	10/11/73	05-00	150.00	375.00 375.00	VAC. 10/21/78 SICK	121.00	97.50	117.50	8.50	26.00	300.00	
07000103	GORZKOWSKI 201-26-8153	P	02/07/77	01-08	75.00	300.00 300.00	VAC. 10/21/78 SICK	99.00	7.50	7.50	6.50	26.00	98.00	
07000105	GRAY 289-18-2126	P	06/01/76	02-04	45.00	240.00 240.00	VAC. 10/21/78 SICK	587.25	30.00	52.50	6.50	26.00	623.75	
07000115	HINDLEY 218-56-5349	P	04/29/77	01-06	75.00	300.00 300.00	VAC. 09/09/78 SICK 10/21/78	63.00	7.50	7.50 15.00	6.50	26.00	62.00	
07000128	JENNISON 579-62-9833	P	09/16/75	03-01	75.00	75.00 300.00	VAC. 10/21/78 SICK	47.75	2.00	9.50	6.50	26.00	52.25	
07000130	JOHNSON 108-16-8890	P	12/19/77	00-10	79.00	312.50 312.50	VAC. 10/21/78 SICK 10/21/78	52.50	3.50	23.00 1.00	6.50	26.00	54.50	
07000149	LASHBROOK 107-44-4626	P	01/05/76	02-09	75.00	247.50 247.50	VAC. 10/21/78 SICK 09/09/78	403.50	3.50	49.00 15.50	6.50	26.00	406.50	
07000150	LATTANZIO 186-38-2471	P	01/12/76	02-09	68.00	278.00 278.00	VAC. 10/21/78 SICK	543.25	11.50	75.00	6.50	26.00	538.25	
07000162	MCGAFFIN 118-07-3939	P	05/27/75	03-05	75.00	300.00 300.00	VAC. 10/07/78 SICK	388.50		7.50	6.50	26.00	395.00	
07000165	METAKSA 060-20-1725	P	03/21/77	01-07	75.00	272.50	VAC. 10/07/78	613.75		7.00	6.50	26.00	620.25	

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11/04/78

VACATION AND SICK LEAVE REPORT - DEPT EA0700

PAGE 8

-----EMPLOYEE HISTORY-----				*-----TOTAL-----*		*-----VACATION AND SICK HOURS-----*								
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EA07000006	AQUILINO 579-62-1041	P	10/26/76	02-01	75.00	75.00 300.00	VAC. 09/23/78 SICK	146.50		52.50	6.50	26.00	153.00	
EA07000008	BACCHI 200-42-6255	P	01/31/77	01-10	81.00	400.50 400.50	VAC. 11/04/78 SICK	61.50	2.00	4.00	6.50	32.50	66.00	
EA07000021	DOWLUT 314-46-8382	X	06/20/77	01-05	43.50	206.25 206.25	VAC. SICK							
EA07000080	PROYCE 577-74-5978	P	10/11/73	05-01		375.00	VAC. 10/21/78 SICK	302.00		117.00	8.00	34.00	381.00	
EA07000103	GURZKOWSKI 201-26-8153	P	02/07/77	01-09	75.00	375.00 375.00	VAC. 11/04/78 SICK	98.00	18.50	26.00	6.50	32.50	86.00	
EA07000105	GRAY 289-18-2126	P	06/01/76	02-05	75.00	315.00 315.00	VAC. 10/21/78 SICK	623.75		52.50	6.50	32.50	630.25	
EA07000115	HINDLEY 218-56-5349	P	04/29/77	01-07	75.00	375.00 375.00	VAC. 09/09/78 SICK 10/21/78	62.00		7.50 15.00	6.50	32.50	68.50	
EA07000128	JENNISON 579-62-9833	P	09/16/75	03-02	75.00	150.00 375.00	VAC. 11/04/78 SICK	52.25	30.00	39.50	6.50	32.50	28.75	
EA07000130	JOHNSON 108-16-8890	P	12/19/77	00-11	78.50	391.00 391.00	VAC. 11/04/78 SICK 10/21/78	54.50	17.50	40.50 1.00	6.50	32.50	43.50	
EA07000149	LASHBROUK 107-44-4626	P	01/05/76	02-10	75.00	322.50 322.50	VAC. 11/04/78 SICK 09/09/78	406.50	10.50	38.50 15.50	6.50	32.50	402.50	
EA07000150	LATTANZIO 186-38-2471	P	01/12/76	02-10	75.00	353.00 353.00	VAC. 11/04/78 SICK	538.25	45.00	120.00	6.50	32.50	499.75	
EA07000162	MCGAFFIN 118-07-3939	P	05/27/75	03-06	75.00	375.00 375.00	VAC. 11/04/78 SICK	395.00	22.50	30.00	6.50	32.50	379.00	

NATIONAL RIFLE ASSOCIATION

21/78

VACATION AND SICK LEAVE REPORT - DEPT EA0700

PAGE 8

EMPLOYEE HISTORY					* *---TOTAL---*		*---VACATION AND SICK HOURS---*							
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07000008	BACCHI 200-42-6255	P	01/31/77	01-09	80.00	319.50 319.50	VAC. 10/21/78 SICK	56.00	1.00	2.00	6.50	26.00	61.50	
07000021	DOWLUT 314-46-8382	X	06/20/77	01-04	37.50	162.75 162.75	VAC. SICK							
07000080	ROYCE 577-74-5978	P	10/11/73	05-00	150.00	375.00 375.00	VAC. 10/21/78 SICK	121.00	97.50	117.00	6.50	26.00	30.00	
07000103	GORZKOWSKI 201-26-8153	P	02/07/77	01-08	75.00	300.00 300.00	VAC. 10/21/78 SICK	99.00	7.50	7.50	6.50	26.00	98.00	
07000105	GRAY 289-18-2126	P	06/01/76	02-04	45.00	240.00 240.00	VAC. 10/21/78 SICK	587.25	30.00-	52.50-	6.50	26.00	623.75	
07000115	HINDLEY 218-56-5349	P	04/29/77	01-06	75.00	300.00 300.00	VAC. 09/09/78 SICK 10/21/78	63.00		7.50 15.00	6.50	26.00	62.00	
07000128	JENNISON 579-62-9833	P	09/16/75	03-01	75.00	75.00 300.00	VAC. 10/21/78 SICK	47.75	2.00	9.50	6.50	26.00	52.25	
07000130	JOHNSON 108-16-8890	P	12/19/77	00-10	79.00	312.50 312.50	VAC. 10/21/78 SICK 10/21/78	52.50	3.50 1.00	23.00 1.00	6.50	26.00	54.50	
07000149	LASHBROOK 107-44-4626	P	01/05/76	02-09	75.00	247.50 247.50	VAC. 10/21/78 SICK 09/09/78	403.50	3.50	49.00- 15.50	6.50	26.00	406.50	
07000150	LATTANZIO 186-38-2471	P	01/12/76	02-09	68.00	278.00 278.00	VAC. 10/21/78 SICK	543.25	11.50	75.00	6.50	26.00	538.25	
07000162	MCGAFFIN 118-07-3939	P	05/27/75	03-05	75.00	300.00 300.00	VAC. 10/07/78 SICK	388.50		7.50	6.50	26.00	395.00	
07000165	METAKSA 040-30-1725	P	03/21/77	01-07	75.00	272.50	VAC. 10/07/78	613.75		7.00	6.50	26.00	620.25	

11/04/78

VACATION AND SICK LEAVE REPORT - DEPT EA0700

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EA07000008	BACCHI 200-42-6255	P	01/31/77	01-10	81.00	400.50 400.50	11/04/78	61.50	2.00	4.00	6.50	32.50	66.00						
EA07000021	DOWLUT 314-46-8382	X	06/20/77	01-05	43.50	206.25 206.25													
EA07000080	ROYCE 577-74-5978	P	10/11/73	05-01		375.00	10/21/78	30.00		117.00	8.00	34.00	38.00						
EA07000103	GORZKOWSKI 201-26-8153	P	02/07/77	01-09	75.00	375.00 375.00	11/04/78	98.00	18.50	26.00	6.50	32.50	86.00						
EA07000105	GRAY 289-18-2126	P	06/01/76	02-05	75.00	315.00 315.00	10/21/78	623.75		52.50	6.50	32.50	630.25						
EA07000115	HINDLEY 218-56-5349	P	04/29/77	01-07	75.00	375.00 375.00	09/09/78 10/21/78	62.00		7.50 15.00	6.50	32.50	68.50						
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EA07000130	JOHNSON 108-16-8890	P	12/19/77	00-11	78.50	391.00 391.00	11/04/78 10/21/78	54.50	17.50	40.50 1.00	6.50	32.50	43.50						
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EA07000150	LATTANZIO 186-38-2471	P	01/12/76	02-10	75.00	353.00 353.00	11/04/78	538.25	45.00	120.00	6.50	32.50	499.75						
EA07000162	MCGAFFIN 118-07-3939	P	05/27/75	03-06	75.00	375.00 375.00	11/04/78	395.00	22.50	30.00	6.50	32.50	379.00						

No. 30040

Name Kathryn Coe Royce

75 Hours Leave

FORM 5-208711

DATE	IN	OUT	IN	OUT	IN	OUT
16						
17						
18						
19						
20						
21						
22						
23						
24						
25						
26						
27						
28						
29						
30						
31						

Approved by:

H. R. McSpaffin
Fiscal Officer

check no. 03996
d.H. 14/98

OVERTIME		HOURS	
R. T.	O. T.	WORKED	ABSENT
			75
			TOTAL
			75

No. 6 NO. 1

Name Kathryn Coe Royce

22 1/2 Hours Leave

FORM 5-208711

DATE	IN	OUT	IN	OUT	IN	OUT
16						
17						
18						
19						
20						
21						
22						
23						
24						
25						
26						
27						
28						
29						
30						
31						

Approved by:

H. R. McSpaffin
Fiscal Officer

check no. 03995
d.H. 14/98

OVERTIME		HOURS	
R. T.	O. T.	WORKED	ABSENT
		5 1/2	22 1/2
			TOTAL
			75



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

The Honorable Wayne Grisham
House of Representatives
511 Cannon Building
Washington, D.C. 20515

Re: MUR 1029

Dear Mr. Grisham:

I am forwarding for your information the enclosed complaint which was received by the Commission.

The Commission has determined that on the basis of the information in the complaint there is no reason to believe that you, as a candidate, have committed a violation of any statute within its jurisdiction. Accordingly, the Commission intends to close its file on this matter as it pertains to you.

However, the Commission has found reason to believe that your principal campaign committee may have violated 2 U.S.C. § 434 for failure to report the receipt of an in-kind contribution. The notification letter which the Commission has sent to your committee is enclosed for your reference.

Should you have any questions, please direct them to Suzanne Callahan, the staff member assigned to this matter, at (202) 523-4529.

Sincerely,

William C. Oldaker
General Counsel

Enclosures
Complaint
Notification Letter to Committee

30040173602

If you have any questions, please contact Suzanne Callahan, the staff member assigned to this matter, at (202) 523-4529.

This matter will remain confidential in accordance with 2 U.S.C. Section 437g(a)(3)(B) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,

William C. Oldaker
General Counsel

Enclosures
Complaint
Excerpt from NRA Report

30040173603



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Cathy Brooks, Treasurer
Grisham for Congress
6707 Bright Avenue
Whittier, California 90601

Re: MUR 1029

Dear Ms. Brooks:

The Federal Election Commission has received a complaint which alleges that the Grisham for Congress Committee has committed certain violations of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed.

We have numbered this matter MUR 1029. Please refer to this number in all future correspondence.

The Commission has reason to believe that the matters alleged in the complaint may state a violation of 2 U.S.C. § 434 (11 C.F.R. 104.3). Specifically, it appears that the committee has failed to report receipt of a \$2,000 in-kind contribution from the NRA Political Victory Fund. A copy of that portion of NRA's report which pertains to this matter is enclosed for your reference.

Under the Act, you have an opportunity to demonstrate that no action should be taken against your committee. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification. If no response is received, the Commission may take further action based on the information at hand.

30040173604



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. James J. Featherstone, Treasurer
National Rifle Association
1600 Rhode Island Avenue, N.W.
Washington, D.C. 20036

Re: MUR 1029

Dear Mr. Featherstone:

I am forwarding for your information the enclosed complaint which was received by the Commission.

The Commission has determined that on the basis of the information in the complaint there is no reason to believe that a violation of any statute within its jurisdiction has been committed by the National Rifle Association of America, Inc. Accordingly, the Commission intends to close its file on this matter as it pertains to NRA.

Sincerely,

William C. Oldaker
General Counsel

Enclosure
Complaint

80040173605

1029 Collection
GCC # 11139

RECEIVED
OFFICE OF THE
GENERAL COUNSEL

19 SEP 19 A 9: 51



NRA *Political Victory Fund*

Institute for Legislative Action
P.O. Box 2019, Washington, D.C. 20013

September 18, 1979

Mr. William C. Oldaker
General Counsel
Federal Election Commission
1325 K Street, NW
Washington, DC 20463

Dear Mr. Oldaker:

Thank you for releasing a copy of the complaint filed against the National Rifle Association of America by the National Coalition to Ban Handguns. One Samuel S. Fields has accused the NRA of making illegal corporate contributions to the campaign of Congressman Wayne Grisham of California. The accusation is false.

An employee of the NRA, Ms. Kathryn Coe Royce, worked in the Grisham campaign office from October 18 to November 2, 1978. She was a volunteer serving on personal leave time as verified by our computer personnel records and time cards, copies of which are enclosed. Her travel and living expenses were properly paid by the NRA Political Victory Fund and reported in our 10 Day Pre-General 1978 election report as an in-kind contribution to the Grisham campaign.

The statement attributed to Susan Recce of this office was in error. Ms. Royce was on personal leave not only for the campaign period noted above but also for a period of time thereafter. Please advise if further information is desired.

Sincerely,

James J. Featherstone
James J. Featherstone
Treasurer

JJF:jmb

30040173603

NATIONAL RIFLE ASSOCIATION

VACATION AND SICK LEAVE REPORT - DEPT EA0700

10/21/78

EMPLOYEE HISTORY										*-----TOTAL-----*		*-----VACATION AND SICK HOURS-----*				
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EA07000080	[REDACTED] 577-74-5978	P	10/11/73	05-00	[REDACTED]	375.00 375.00	VAC. 10/21/78 SICK	121.00	97.50	117.00	[REDACTED]	[REDACTED]	[REDACTED]			
EA07000103	GORZKOWSKI 201-26-8153	P	02/07/77	01-08	75.00	300.00 300.00	VAC. 10/21/78 SICK	99.00	7.50	7.50	6.50	26.00	98.00			
EA07000105	GRAY 289-18-2126	P	06/01/76	02-04	45.00	240.00 240.00	VAC. 10/21/78 SICK	587.25	30.00-	52.50-	6.50	26.00	623.75			
EA07000115	HINDLEY 218-56-5349	P	04/29/77	01-06	75.00	300.00 300.00	VAC. 09/09/78 SICK 10/21/78	63.00		7.50 15.00	6.50	26.00	62.00			
EA07000128	JENNISON 579-62-9833	P	09/16/75	03-01	75.00	75.00 300.00	VAC. 10/21/78 SICK	47.75	2.00	9.50	6.50	26.00	52.25			
EA07000130	JOHNSON 108-16-8890	P	12/19/77	00-10	79.00	312.50 312.50	VAC. 10/21/78 SICK 10/21/78	52.50	3.50 1.00	23.00 1.00	6.50	26.00	54.50			
EA07000149	LASHBROOK 107-44-4626	P	01/05/76	02-09	75.00	247.50 247.50	VAC. 10/21/78 SICK 09/09/78	403.50	3.50	49.00- 15.50	6.50	26.00	406.50			
EA07000150	LATTANZIO 186-38-2471	P	01/12/76	02-09	68.00	278.00 278.00	VAC. 10/21/78 SICK	543.25	11.50	75.00	6.50	26.00	538.25			
EA07000162	MCGAFFIN 118-07-3939	P	05/27/75	03-05	75.00	300.00 300.00	VAC. 10/07/78 SICK	388.50		7.50	6.50	26.00	395.00			
EA07000165	METAKSA 040-30-1735	P	03/21/77	01-07	75.00	272.50 272.50	VAC. 10/07/78 SICK	613.75		7.00	6.50	26.00	620.25			

11/04/78

VACATION AND SICK LEAVE REPORT - DEPT EA0700

PAGE 8

-----EMPLOYEE HISTORY-----						*-----TOTAL-----*		*-----VACATION AND SICK HOURS-----*						
ID NUMBER	NAME SOC SEC #	T C	HIRE DATE	LOS YY MM	REGULAR CUR	HOURS YTD	WEEK ENDING	PRIOR BAL	CUR USED	YTD USED	CUR ERND	YTD ERND	NEW BAL	FLAGS
EA07000006	AQUILINO 579-62-1041	P	10/26/76	02-01	75.00	75.00 300.00	VAC. 09/23/78 SICK	146.50		52.50	6.50	26.00	153.00	
EA07000008	BACCHI 200-42-6255	P	01/31/77	01-10	81.00	400.50 400.50	VAC. 11/04/78 SICK	61.50	2.00	4.00	6.50	32.50	66.00	
EA07000021	DOWLUT 314-46-8382	X	06/20/77	01-05	43.50	206.25 206.25	VAC. SICK							
EA07000080	[REDACTED] 577-74-5978	P	10/11/73	05-01	[REDACTED]	375.00	VAC. 10/21/78 SICK	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
EA07000103	GORZKOWSKI 201-26-8153	P	02/07/77	01-09	75.00	375.00 375.00	VAC. 11/04/78 SICK	98.00	18.50	26.00	6.50	32.50	86.00	
EA07000105	GRAY 289-18-2126	P	06/01/76	02-05	75.00	315.00 315.00	VAC. 10/21/78 SICK	623.75		52.50	6.50	32.50	630.25	
EA07000115	HINDLEY 218-56-5349	P	04/29/77	01-07	75.00	375.00 375.00	VAC. 09/09/78 SICK 10/21/78	62.00		7.50 15.00	6.50	32.50	68.50	
EA07000128	JENNISON 579-62-9833	P	09/16/75	03-02	75.00	150.00 375.00	VAC. 11/04/78 SICK	52.25	30.00	39.50	6.50	32.50	28.75	
EA07000130	JOHNSON 108-16-8890	P	12/19/77	00-11	78.50	391.00 391.00	VAC. 11/04/78 SICK 10/21/78	54.50	17.50	40.50 1.00	6.50	32.50	43.50	
EA07000149	LASHBROOK 107-44-4626	P	01/05/76	02-10	75.00	322.50 322.50	VAC. 11/04/78 SICK 09/09/78	406.50	10.50	38.50 15.50	6.50	32.50	402.50	
EA07000150	LATTANZIO 186-38-2471	P	01/12/76	02-10	75.00	353.00 353.00	VAC. 11/04/78 SICK	538.25	45.00	120.00	6.50	32.50	499.75	
EA07000162	MCGAFFIN 118-07-3939	P	05/27/75	03-06	75.00	375.00 375.00	VAC. 11/04/78 SICK	395.00	22.50	30.00	6.50	32.50	379.00	
EA07000165	METAKSA	P	03/21/77	01-08	52.50	375.00	VAC. 11/04/78 SICK							

DATE PAY ENDING Nov. 4

No. _____

3 0 0 1 0 7 3 5

Name KATHRYN COE ROYCE

75 Hours Leave

SIMPLEX 9-200711

DATE	IN	OUT	IN	OUT	IN	OUT
16						
17						
18						
19						
20						
21						
22						
23						
24						
25						
26						
27						
28						
29						
30						
31						

Approved by:

H. R. McJuffie
Fiscal Officer

Check No. 03996
d.H. 10/18/78

OVERTIME		HOURS		
R. T.	O. T.	WORKED	ABSENT	TOTAL
_____	_____	_____	75	75
TOTAL	_____	_____	_____	_____

DATE PAY ENDING OCT 27

No. 9

Name KATHRYN COE ROYCE

22 1/2 Hours Leave

SIMPLEX 9-200711

DATE	IN	OUT	IN	OUT	IN	OUT
16						
17						
18						
19						
20						
21						
22						
23						
24						
25						
26						
27						
28						
29						
30						
31						

Approved by:

H. R. McJuffie
Fiscal Officer

holiday

check No. 03995
d.H. 10/18/78

OVERTIME		HOURS		
R. T.	O. T.	WORKED	ABSENT	TOTAL
_____	_____	5 1/2	22 1/2	75
TOTAL	_____	_____	_____	_____



NRA
Political Victory Fund

Institute for Legislative Action
P.O. Box 2019, Washington, D.C. 20013

300401736

Mr. William C. Oldaker
General Counsel
Federal Election Commission
1325 K Street, NW
Washington, DC 20463

1ST CLASS
U S POSTAGE
PAID
Permit No 47118
Washington DC



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 14, 1979

Mr. Dan Miller
National Rifle Association
1600 Rhode Island Avenue, N.W.
Washington, D.C. 20036

Dear Mr. Miller:

In accordance with your request, enclosed is a
copy of the complaint filed against your organization,
the National Rifle Association.

Sincerely,

A handwritten signature in cursive script, appearing to read "William C. Oldaker".

William C. Oldaker
General Counsel

Enclosure

80040173511

September 12, 1979

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 1029

Please have the attached additional information distributed to the Commission on an informational basis.

Thank you.

80010173612

GCC # 11092



100 Maryland Avenue, N.E.
Washington, D.C. 20002
Phone: 544-7190 or 7191

FEDERAL ELECTIONS COMMISSION

national coalition to ban handguns
1979
PM 12:37

RECEIVED
SEP 12 1979
GENERAL COUNSEL

September 10, 1979

Ms. Linda Newcomer
The Federal Elections Commission
1325 K Street, N.W.
Washington, D.C. 20463

Dear Ms. Newcomer:

As per our conversation, enclosed you will find the complaint and copies of material I didn't include.

Thank you very much.

Sincerely,

Sam Fields
Field Director

SF/jrj
/enclosures

30049173613

participating organizations

- American Civil Liberties Union
 - American Ethical Union
 - Americans for Democratic Action
 - American Jewish Congress
 - American Psychiatric Association
 - American Public Health Association
 - Black Women's Community Development Foundation
 - B'nai B'rith Women
 - Board of Church & Society, United Methodist Church
 - Center for Social Action, United Church of Christ
 - Church of the Brethren, Washington Office
 - Disarm Educational Fund
 - Friends Committee on National Legislation
 - International Ladies' Garment Workers Union
 - Jesuit Conference—Office of Social Ministries
 - National Alliance for Safer Cities
 - National Association of Social Workers
 - National Council of Jewish Women, Inc.
 - National Council of Negro Women
 - National Jewish Welfare Board
 - Political Action Committee, Woman's National Democratic Club
 - The Program Agency, United Presbyterian Church in the U.S.A.
 - Union of American Hebrew Congregations
 - Unitarian Universalist Association
 - United States Conference of Mayors
 - United States National Student Association
 - United Synagogue of America
 - Women's Division, Board of Global Ministries, United Methodist Church
 - Women's League for Conservative Judaism
 - Young Women's Christian Association of the U.S.A., National Board
- (partial listing)





100 Maryland Avenue, N.E.
Washington, D.C. 20002
Phone 544-7190 or 7191

national coalition to ban handguns

September 10, 1979

William C. Oldaker, Esquire
General Counsel
The Federal Elections Commission
1325 K Street, N.W.
Washington, D.C. 20463

Dear Sir:

4 Pursuant to 11 C.F.R. §111.2 (1978), I hereby file a com-
1 plaint concerning an apparent indirect contribution by the
6 National Rifle Association of America, Inc. ("NRA") to the
3 campaign of Congressman Wayne Grisham of the 33rd District
of California.

3 To the best of my knowledge, the facts are as follows:

7 From October 18, 1978 to November 2, 1978, Kathryn Coe
1 Royce, an employee of National Rifle Association of
0 America, Inc. performed services in aid of Mr. Grisham's
4 campaign. These services were performed during the normal
0 working hours of NRA, and she received a salary from NRA
0 for this work. Apparently, the National Rifle Association
0 Political Victory Fund (NRA Political Victory Fund) did
0 not reimburse NRA for the salary paid to Ms. Royce. I
0 attach hereto as Exhibit A a memorandum of a conversation
3 between myself and Susan Reece, a lobbyist for NRA who
0 works with Kathryn Royce, in which Ms. Reece stated that
0 Ms. Royce was not on vacation during this period.

It further appears that Congressman Grisham did not report Ms. Royce's salary as a contribution. In addition, as set out in Exhibit B, the NRA Political Victory Fund expended two thousand dollars (\$2,000.00) for the travel and living expenses of Ms. Royce in aiding Mr. Grisham's campaign. Apparently, Mr. Grisham did not report this amount as a contribution.

Specifically, it appears that the National Rifle Association of American, Inc. violated the federal election laws as follows.

1. Within the definition set forth in 11 C.F.R. §100.14 (1978), NRA became a "political committee" when it contributed Ms. Royce's salary to Congressman Grisham's campaign. However, NRA did not comply with the provisions of 2 U.S.C.A. §432

participating organizations

- American Civil Liberties Union
- American Ethical Union
- Americans for Democratic Action
- American Jewish Congress
- American Psychiatric Association
- American Public Health Association
- Black Women's Community Development Foundation
- B'nai B'rith Women
- Board of Church & Society, United Methodist Church
- Center for Social Action, United Church of Christ
- Church of the Brethren, Washington Office
- Disarm Educational Fund
- Friends Committee on National Legislation
- International Ladies' Garment Workers Union
- Jesuit Conference—Office of Social Ministries
- National Alliance for Safer Cities
- National Association of Social Workers
- National Council of Jewish Women, Inc.
- National Council of Negro Women
- National Jewish Welfare Board
- Political Action Committee, Woman's National Democratic Club
- The Program Agency, United Presbyterian Church in the USA
- Union of American Hebrew Congregations
- Unitarian Universalist Association
- United States Conference of Mayors
- United States National Student Association
- United Synagogue of America
- Women's Division, Board of Global Ministries, United Methodist Church
- Women's League for Conservative Judaism
- Young Women's Christian Association of the U.S.A., National Board

(partial listing)



(1977) and 11 C.F.R. Part 102 (1978) concerning the registration and organization of a political committee.

- 2. The payment of Ms. Royce's salary by NRA constituted a "contribution" to the campaign of Congressman Grisham, as that phrase is defined in 11 C.F.R. §100.4 (1978). This contribution was in violation of 2 U.S.C.A. §441b (1977) and 11 C.F.R. §114.2 (1978).

It further appears that Congressman Grisham violated the federal election laws as follows:

- 1. The acceptance by Congressman Grisham of the services of Ms. Royce constituted the acceptance of a contribution in violation of 2 U.S.C.A. §441b (1977) and 11 C.F.R. §114.2(c) (1978).
- 2. Congressman Grisham failed to report the "in-kind" contribution of Ms. Royce's services as required by 2 U.S.C.A. §434 (1977) and 11 C.F.R. §104.3 (1978).
- 3. Congressman Grisham failed to report the "in-kind" contribution of \$2,000 for the travel and living expenses of Ms. Royce paid by the NRA Political Victory Fund as required by 2 U.S.C.A. §434 (1977) and 11 C.F.R. §104.3 (1978).

This complaint is not filed on behalf of or at the request or suggestion of a candidate.

I hereby swear and affirm that to the best of my knowledge, information and belief all of the foregoing facts and representations are true.

800040173615

(DATE)

Samuel S. Fields
Field Director

Appeared before me this 6th day of September, 1979, Mr. Samuel S. Fields who subscribed to the foregoing in my presence.

Notary Public for the District
of Columbia

My Commission Expires: January 1, 1981

cc: Mr. Thomas E. Harris, Chairman
Mr. John D. Aikens, Vice Chairman
Mr. Orlando B. Potter, Staff Dir.
The Federal Elections Commission
1325 K Street, N.W.
Washington, D.C. 20463

- Henry R. Lord, Esquire
Piper and Morbury
1100 Charles Center South
36 South Charles Street
Baltimore, Maryland 21201

REVISED
January, 1978
Federal Election Commission
1375 K Street, N.W.
Washington, D.C. 20463

ITEMIZED EXPENDITURES
(Operating, Transfers Out, Contributions In-Kind,
Loans, Loan Repayments and Refunds Made)
Supporting Lines 20a, 21a, and 22a, 22b, and 22c
of FEC FORM 3

Page 1 of 1 for
Line Number 22c

(Use Separate Schedules for
each numbered line)

Name of Candidate or Committee in Full

NEW POLITICAL VICTORY FUND

Full Name, Mailing Address and ZIP Code
Kathryn Coe Royce

Particulars of Expenditure
**Travel to Los Angeles and
Living Exp. to aid campaign
of Wayne Grisham CA - 33**
Expenditure for
 Primary General Other

Date (month,
day, year)
10/18/78

Amount of each expendi-
ture this period
\$ 2,000.00

Full Name, Mailing Address and ZIP Code
**National Creative Printing,
Inc.**

Particulars of Expenditure
**Printing Postcards for mailing
of Charles Dougherty PA - 4**
Expenditure for
 Primary General Other

Date (month,
day, year)
10/19/78

Amount of each expendi-
ture this period
60.18

Full Name, Mailing Address and ZIP Code

Particulars of Expenditure

Expenditure for
 Primary General Other

Date (month,
day, year)

Amount of each expendi-
ture this period

Full Name, Mailing Address and ZIP Code

Particulars of Expenditure

Expenditure for
 Primary General Other

Date (month,
day, year)

Amount of each expendi-
ture this period

Full Name, Mailing Address and ZIP Code

Particulars of Expenditure

Expenditure for
 Primary General Other

Date (month,
day, year)

Amount of each expendi-
ture this period

Full Name, Mailing Address and ZIP Code

Particulars of Expenditure

Expenditure for
 Primary General Other

Date (month,
day, year)

Amount of each expendi-
ture this period

Full Name, Mailing Address and ZIP Code

Particulars of Expenditure

Expenditure for
 Primary General Other

Date (month,
day, year)

Amount of each expendi-
ture this period

Full Name, Mailing Address and ZIP Code

Particulars of Expenditure

Expenditure for
 Primary General Other

Date (month,
day, year)

Amount of each expendi-
ture this period

SUBTOTAL of expenditures this page (optional)

\$ 2,060.18

80010173615
7805013451



100 Maryland Avenue, N.E.
Washington, D.C. 20002
Phone: 544-7190 or 7191

national coalition to ban handguns

M E M O R A N D U M

DATE: November 2, 1978

RE: Phone conversation between Sam Fields and Susan Reece.

Susan Reece stated that Kathryn Coe Royce was in California working on a campaign and not on vacation. She indicated that she would return to the office on Wednesday, November 8th.

participating organizations

- American Civil Liberties Union
- American Ethical Union
- Americans for Democratic Action
- American Jewish Congress
- American Psychiatric Association
- American Public Health Association
- Black Women's Community Development Foundation
- B'nai B'rith Women
- Board of Church & Society, United Methodist Church
- Center for Social Action, United Church of Christ
- Church of the Brethren, Washington Office
- Disarm Educational Fund
- Friends Committee on National Legislation
- International Ladies' Garment Workers Union
- Jesuit Conference—Office of Social Ministries
- National Alliance for Safer Cities
- National Association of Social Workers
- National Council of Jewish Women, Inc.
- National Council of Negro Women
- National Jewish Welfare Board
- Political Action Committee, Woman's National Democratic Club
- The Program Agency, United Presbyterian Church in the U.S.A.
- Union of American Hebrew Congregations
- Unitarian Universalist Association
- United States Conference of Mayors
- United States National Student Association
- United Synagogue of America
- Women's Division, Board of Global Ministries, United Methodist Church
- Women's League for Conservative Judaism
- Young Women's Christian Association of the U.S.A., National Board

(partial listing)

80040173617

100 Maryland Avenue N E
Washington, DC 20002



national coalition to ban handguns

RECEIVED
FEDERAL ELECTION
COMMISSION



'79 SEP 12 PM 12:37

William C. Oldaker, Esquire
General Counsel
The Federal Elections Commission
1325 K Street, N.W.
Washington, D.C. 20463

ATTN: Ms. Linda Newcomer

80040173618



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

September 12, 1979

Mr. Samuel S. Fields
Field Director
National Coalition to Ban Handguns
100 Maryland Avenue, N.E.
Washington, D.C. 20002

Dear Mr. Fields:

This is to acknowledge receipt of your complaint of September 10, 1979, alleging violations of the Federal Election Campaign Laws. A staff member has been assigned to analyze your allegations and a recommendation to the Federal Election Commission as to how this matter should be handled will be made shortly. You will be notified as soon as the Commission determines what action should be taken. For your information, we have attached a brief description of the Commission's preliminary procedures for the handling of complaints.

Sincerely,

A handwritten signature in black ink, appearing to read "Hal Ponder".

Hal Ponder
Assistant General Counsel

Enclosure

80040173619



100 Maryland Avenue, N.E.
Washington, D.C. 20002
Phone 544-7190 or 7191

national coalition to ban handguns

mur 1029
RECEIVED
OFFICE OF THE
GENERAL COUNSEL
FEDERAL ELECTION
COMMISSION

11069

SI 4054

79 SEP 11 12:02
79 SEP 10 PM 4:22

September 10, 1979

William C. Oldaker, Esquire
General Counsel
The Federal Elections Commission
1325 K Street, N.W.
Washington, D.C. 20463

Dear Sir:

Pursuant to 11 C.F.R. §111.2 (1978), I hereby file a complaint concerning an apparent indirect contribution by the National Rifle Association of America, Inc. ("NRA") to the campaign of Congressman Wayne Grisham of the 33rd District of California.

To the best of my knowledge, the facts are as follows:

From October 18, 1978 to November 2, 1978, Kathryn Coe Royce, an employee of National Rifle Association of America, Inc. performed services in aid of Mr. Grisham's campaign. These services were performed during the normal working hours of NRA, and she received a salary from NRA for this work. Apparently, the National Rifle Association Political Victory Fund (NRA Political Victory Fund) did not reimburse NRA for the salary paid to Ms. Royce. I attach hereto as Exhibit A a memorandum of a conversation between myself and Susan Reece, a lobbyist for NRA who works with Kathryn Royce, in which Ms. Reece stated that Ms. Royce was not on vacation during this period.

It further appears that Congressman Grisham did not report Ms. Royce's salary as a contribution. In addition, as set out in Exhibit B, the NRA Political Victory Fund expended two thousand dollars (\$2,000.00) for the travel and living expenses of Ms. Royce in aiding Mr. Grisham's campaign. Apparently, Mr. Grisham did not report this amount as a contribution.

Specifically, it appears that the National Rifle Association of American, Inc. violated the federal election laws as follows.

1. Within the definition set forth in 11 C.F.R. §100.14 (1978), NRA became a "political committee" when it contributed Ms. Royce's salary to Congressman Grisham's campaign. However, NRA did not comply with the provisions of 2 U.S.C.A. §432

participating organizations

- American Civil Liberties Union
 - American Ethical Union
 - Americans for Democratic Action
 - American Jewish Congress
 - American Psychiatric Association
 - American Public Health Association
 - Black Women's Community Development Foundation
 - B'nai B'rith Women
 - Board of Church & Society, United Methodist Church
 - Center for Social Action, United Church of Christ
 - Church of the Brethren, Washington Office
 - Disarm Educational Fund
 - Friends Committee on National Legislation
 - International Ladies' Garment Workers Union
 - Jesuit Conference—Office of Social Ministries
 - National Alliance for Safer Cities
 - National Association of Social Workers
 - National Council of Jewish Women, Inc
 - National Council of Negro Women
 - National Jewish Welfare Board
 - Political Action Committee Woman's National Democratic Club
 - The Program Agency, United Presbyterian Church in the U.S.A
 - Union of American Hebrew Congregations
 - Unitarian Universalist Association
 - United States Conference of Mayors
 - United States National Student Association
 - United Synagogue of America
 - Women's Division, Board of Global Ministries, United Methodist Church
 - Women's League for Conservative Judaism
 - Young Women's Christian Association of the U.S.A National Board
- (partial listing)



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- 1. The acceptance by Congressman Grisham of the services of Ms. Royce constituted the acceptance of a contribution in violation of 2 U.S.C.A. §441b (1977) and 11 C.F.R. §114.2(c) (1978).
- 2. Congressman Grisham failed to report the "in-kind" contribution of Ms. Royce's services as required by 2 U.S.C.A. §434 (1977) and 11 C.F.R. §104.3 (1978).
- 3. Congressman Grisham failed to report the "in-kind" contribution of \$2,000 for the travel and living expenses of Ms. Royce paid by the NRA Political Victory Fund as required by 2 U.S.C.A. §434 (1977) and 11 C.F.R. §104.3 (1978).

This complaint is not filed on behalf of or at the request or suggestion of a candidate.

I hereby swear and affirm that to the best of my knowledge, information and belief all of the foregoing facts and representations are true.

9/16/79

(DATE)

Samuel S. Fields

Samuel S. Fields
Field Director

Appeared before me this 6th day of September, 1979, Mr. Samuel S. Fields who subscribed to the foregoing in my presence.

Charles W. McCormick

Notary Public for the District
of Columbia

My Commission Expires: January 1, 1981

cc: Mr. Thomas E. Harris, Chairman - Henry R. Lord, Esquire
 Mr. John D. Aikens, Vice Chairman Piper and Morbury
 Mr. Orlando B. Potter, Staff Dir. 1100 Charles Center South
 The Federal Elections Commission 36 South Charles Street
 1325 K Street, N.W. Baltimore, Maryland 21201
 Washington, D.C. 20463

173621

80010173622



100 Maryland Avenue N E
Washington, D C 20002

national coalition to ban handguns



79 SEP 10 PM 4:22

William C. Oldaker, Esquire
General Counsel
The Federal Elections Commission
1325 K Street, N.W.
Washington, D.C. 20463

FEDERAL ELECTIONS COMMISSION



FEDERAL ELECTION COMMISSION

1325 K STREET NW
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 1029

Date Filmed 1/25/80 Camera No. --- 2

Cameraman SPC

8001073623