



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 1328

Date Filmed 6/2/82 Camera No. --- 2

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FEDERAL ELECTION COMMISSION

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The above-described material was removed from this file pursuant to the following exemption provided in the Freedom of Information Act, 5 U.S.C. Section 552(b):

- (1) Classified Information
- (2) Internal rules and practices
- (3) Exempted by other statute
- (4) Trade secrets and commercial or financial information
- (5) Internal Documents
- (6) Personal privacy
- (7) Investigatory files
- (8) Banking Information
- (9) Well Information (geographic or geophysical)

Signed Thomas J. White  
Date May 13, 1982

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

May 10, 1982

Mr. Paul Harris, Chairman  
The Democratic County Committee  
of Lee County, Virginia  
P.O. Sob 404  
Jonesville, Virginia 24263

RE: MUR 1358

Dear Mr. Harris:

On January 5, 1981, the Commission notified you of a complaint, designated MUR 1358, alleging that your committee had violated certain sections of the Federal Election Campaign Act of 1971, as amended, or Chapters 95 and 96 of Title 26, U.S. Code. The Commission merged MUR 1358 with MUR 1328.

On May 4, 1982, the Commission found: 1) no reason to believe that your Committee had violated 2 U.S.C. § 441d; and, 2) reason to believe that it had violated 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) in connection with the above referenced MUR.. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. The file will be made part of the public record within thirty days. Should you wish to submit any materials to appear on the public record, please do so within ten days.

The Commission reminds you that making expenditures (not authorized by the National Committee of a political party pursuant to 2 U.S.C. § 441a(d)) by a local party committee in connection with the general election campaign for any candidate for President of the United States nevertheless appears to be a violation of 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) and you should take immediate steps to insure that this activity does not occur in the future.

Sincerely,

Danny L. McDonald  
Vice Chairman for the  
Federal Election Commission

8204033004



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

May 10, 1982

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

J. Curtis Herge, Esquire  
Sedam and Herge  
7600 Old Springhouse Road  
McLean, Virginia 22102

RE: MURs 1328 and 1358

Dear Mr. Herge:

The Federal Election Commission has reviewed the allegations of your complaints and determined that on the basis of the information provided in your complaints and information provided by the respondents, there is: 1) no reason to believe that a violation of 2 U.S.C. § 441d has been committed; and, 2) reason to believe that a violation of 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) has been committed. However, after considering the circumstances of this matter, the Commission has determined to take no further action with regard to the violation and close the file as it pertains to the respondent.

The Federal Election Campaign Act allows a complainant to seek judicial review of the Commission's action in this matter. See 2 U.S.C. § 437g(a)(8).

Should additional information come to your attention which you believe establishes a violation of the Act, you may file a complaint pursuant to the requirements set forth in 2 U.S.C. § 437g(a)(1) and 11 C.F.R. § 111.4.

Sincerely,

Danny L. McDonald  
Vice Chairman for the  
Federal Election Commission

82040330005



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 10, 1982

Lawrence H. Framme, III, Esquire  
1400 Ross Building  
Richmond, Virginia 23219

RE: MUR 1328 and 1358

Dear Mr. Framme:

This letter is in regard to two complaints, designated MUR 1328 and MUR 1358, filed by the Republican Party of Virginia against your clients, the Democratic County Committee of Roanoke County, the Democratic County Committee of Orange County, the Democratic County Committee of Rappahannock County, the Democratic County Committee of Amelia County, the Democratic County Committee of Clarke County, the Democratic County Committee of Greene County, the Democratic County Committee of Gloucester County, the Democratic County Committee of Mathews County, the Democratic County Committee of Goochland County, the Democratic County Committee of Lunenburg County, the Democratic City Committee of Hopewell, the Democratic County Committee of Botetourt County, the Democratic County Committee of Henry County, the Democratic City Committee of Martinsville, the Democratic County Committee of Warren County, the Democratic City Committee of Galax, the Democratic County Committee of Grayson County, and the Democratic County Committee of Lee County. The complaints alleged that the committees had violated certain sections of the Federal Election Campaign Act of 1971, as amended. The Commission merged MUR 1358 with MUR 1328.

On May 4, 1982, the Commission found: 1) no reason to believe that these respondents had violated 2 U.S.C. § 441d; and, 2) reason to believe that they had violated 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. The file will be made part of the public record within thirty days. Should you wish to submit any materials to appear on the public record, please do so within ten days.

The Commission reminds you that making expenditures (not authorized by the National Committee of a political party pursuant to 2 U.S.C. § 441a(d)) by a local party committee in connection with the general election campaign for any candidate for President of the United States nevertheless appears to be a

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Letter to Lawrence H. Franke, III  
Page 2

violation of 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) and you should take immediate steps to insure that this activity does not occur in the future.

The respective committees have also been notified of the Commission's finding. If you have any questions, please contact Thomas J. Whitehead at (202) 523-4000.

Sincerely,  
*Danny McDonald*

Danny L. McDonald  
Vice Chairman for the  
Federal Election Commission

82040330007



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

May 10, 1982

Mr. Watkins Elleson, III, Chairman  
The Democratic County Committee  
of Orange County, Virginia  
P.O. Box 1080  
Orange, Virginia 22960

RE: MUR 1328

Dear Mr. Elleson:

On December 31, 1980, the Commission notified you of a complaint, designated MUR 1328, alleging that your committee had violated certain sections of the Federal Election Campaign Act of 1971, as amended, or Chapters 95 and 96 of Title 26, U.S. Code.

On May 4, 1982, the Commission found: 1) no reason to believe that your Committee had violated 2 U.S.C. § 441d; and, 2) reason to believe that it had violated 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. The file will be made part of the public record within thirty days. Should you wish to submit any materials to appear on the public record, please do so within ten days.

The Commission reminds you that making expenditures (not authorized by the National Committee of a political party pursuant to 2 U.S.C. § 441a(d)) by a local party committee in connection with the general election campaign for any candidate for President of the United States nevertheless appears to be a violation of 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) and you should take immediate steps to insure that this activity does not occur in the future.

Sincerely,

A handwritten signature in cursive script that reads "Danny L. McDonald".

Danny L. McDonald  
Vice Chairman for the  
Federal Election Commission

82040330008



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 10, 1982

Mr. Claude D. Carter, Chairman  
The Democratic County Committee  
of Botetourt County, Virginia  
P.O. Box 368  
Daleville, Virginia 24083

RE: MUR 1328

Dear Mr. Carter:

On December 31, 1980, the Commission notified you of a complaint, designated MUR 1328, alleging that your committee had violated certain sections of the Federal Election Campaign Act of 1971, as amended, or Chapters 95 and 96 of Title 26, U.S. Code.

On May 4, 1982, the Commission found: 1) no reason to believe that your Committee had violated 2 U.S.C. § 441d; and, 2) reason to believe that it had violated 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. The file will be made part of the public record within thirty days. Should you wish to submit any materials to appear on the public record, please do so within ten days.

The Commission reminds you that making expenditures (not authorized by the National Committee of a political party pursuant to 2 U.S.C. § 441a(d)) by a local party committee in connection with the general election campaign for any candidate for President of the United States nevertheless appears to be a violation of 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) and you should take immediate steps to insure that this activity does not occur in the future.

Sincerely,

Danny L. McDonald  
Vice Chairman for the  
Federal Election Commission

8204033009



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

May 10, 1982

Mr. James Edmunds, Chairman  
The Democratic County Committee  
of Lunenburg County, Virginia  
Lunenburg County, Virginia

RE: MUR 1328

Dear Mr. Edmunds:

On December 31, 1980, the Commission notified you of a complaint, designated MUR 1328, alleging that your committee had violated certain sections of the Federal Election Campaign Act of 1971, as amended, or Chapters 95 and 96 of Title 26, U.S. Code.

On May 4, 1982, the Commission found: 1) no reason to believe that your Committee had violated 2 U.S.C. § 441d; and, 2) reason to believe that it had violated 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. The file will be made part of the public record within thirty days. Should you wish to submit any materials to appear on the public record, please do so within ten days.

The Commission reminds you that making expenditures (not authorized by the National Committee of a political party pursuant to 2 U.S.C. § 441a(d)) by a local party committee in connection with the general election campaign for any candidate for President of the United States nevertheless appears to be a violation of 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) and you should take immediate steps to insure that this activity does not occur in the future.

Sincerely,

A handwritten signature in cursive script that reads "Danny L. McDonald".

Danny L. McDonald  
Vice Chairman for the  
Federal Election Commission

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 10, 1982

Ms. Betty Ann Saunders, Chairman  
The Democratic County Committee  
of Roanoke County, Virginia  
5134 Remington Road, S.W.  
Roanoke, Virginia 24014

RE: MUR 1328

Dear Ms. Saunders:

On December 31, 1980, the Commission notified you of a complaint, designated MUR 1328, alleging that your committee had violated certain sections of the Federal Election Campaign Act of 1971, as amended, or Chapters 95 and 96 of Title 26, U.S. Code.

On May 4, 1982, the Commission found: 1) no reason to believe that your Committee had violated 2 U.S.C. § 441d; and, 2) reason to believe that it had violated 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. The file will be made part of the public record within thirty days. Should you wish to submit any materials to appear on the public record, please do so within ten days.

The Commission reminds you that making expenditures (not authorized by the National Committee of a political party pursuant to 2 U.S.C. § 441a(d)) by a local party committee in connection with the general election campaign for any candidate for President of the United States nevertheless appears to be a violation of 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) and you should take immediate steps to insure that this activity does not occur in the future.

Sincerely,

Danny L. McDonald  
Vice Chairman for the  
Federal Election Commission

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

May 10, 1982

Ms. Heda Trana, Chairman  
The Democratic County Committee  
of Hopewell County, Virginia  
Hopewell, Virginia 23860

RE: MUR 1328

Dear Ms. Trana:

On December 31, 1980, the Commission notified you of a complaint, designated MUR 1328, alleging that your committee had violated certain sections of the Federal Election Campaign Act of 1971, as amended, or Chapters 95 and 96 of Title 26, U.S. Code.

On May 4, 1982, the Commission found: 1) no reason to believe that your Committee had violated 2 U.S.C. § 441d; and, 2) reason to believe that it had violated 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. The file will be made part of the public record within thirty days. Should you wish to submit any materials to appear on the public record, please do so within ten days.

The Commission reminds you that making expenditures (not authorized by the National Committee of a political party pursuant to 2 U.S.C. § 441a(d)) by a local party committee in connection with the general election campaign for any candidate for President of the United States nevertheless appears to be a violation of 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) and you should take immediate steps to insure that this activity does not occur in the future.

Sincerely,

Danny L. McDonald  
Vice Chairman for the  
Federal Election Commission

32040330012



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

May 10, 1982

Mrs. Dorothy Bowles; Chairman  
The Democratic County Committee  
of Goochland County, Virginia  
Kents Store, Virginia 23084

RE: MUR 1328

Dear Mrs. Bowles:

On December 31, 1980, the Commission notified you of a complaint, designated MUR 1328, alleging that your committee had violated certain sections of the Federal Election Campaign Act of 1971, as amended, or Chapters 95 and 96 of Title 26, U.S. Code.

On May 4, 1982, the Commission found: 1) no reason to believe that your Committee had violated 2 U.S.C. § 441d; and, 2) reason to believe that it had violated 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. The file will be made part of the public record within thirty days. Should you wish to submit any materials to appear on the public record, please do so within ten days.

The Commission reminds you that making expenditures (not authorized by the National Committee of a political party pursuant to 2 U.S.C. § 441a(d)) by a local party committee in connection with the general election campaign for any candidate for President of the United States nevertheless appears to be a violation of 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) and you should take immediate steps to insure that this activity does not occur in the future.

Sincerely,

Danny L. McDonald  
Vice Chairman for the  
Federal Election Commission

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

May 10, 1982

Lawrence White, Chairman  
The Democratic County Committee  
of Clarke County, Virginia  
Battleton Drive  
Berryville, Virginia 22611

RE: MUR 1328

Dear Mr. White:

On November 3, 1980, the Commission notified you of a complaint, designated MUR 1328, alleging that your committee had violated certain sections of the Federal Election Campaign Act of 1971, as amended, or Chapters 95 and 96 of Title 26, U.S. Code.

On May 4, 1982, the Commission found: 1) no reason to believe that your Committee had violated 2 U.S.C. § 441d; and, 2) reason to believe that it had violated 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. The file will be made part of the public record within thirty days. Should you wish to submit any materials to appear on the public record, please do so within ten days.

The Commission reminds you that making expenditures (not authorized by the National Committee of a political party pursuant to 2 U.S.C. § 441a(d)) by a local party committee in connection with the general election campaign for any candidate for President of the United States nevertheless appears to be a violation of 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) and you should take immediate steps to insure that this activity does not occur in the future.

Sincerely,

Danny L. McDonald  
Vice Chairman for the  
Federal Election Commission

32040330014



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

May 10, 1982

A. H. Keyesen, Chairman  
The Democratic County Committee  
of Rappahannock County, Virginia  
Washington, Virginia 22747

RE: MUR 1328

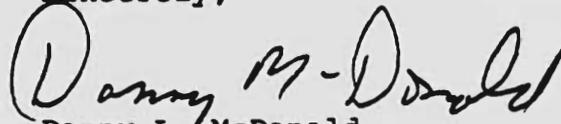
Dear Mr. Keyesen:

On November 3, 1980, the Commission notified you of a complaint, designated MUR 1328, alleging that your committee had violated certain sections of the Federal Election Campaign Act of 1971, as amended, or Chapters 95 and 96 of Title 26, U.S. Code.

On May 4, 1982, the Commission found: 1) no reason to believe that your Committee had violated 2 U.S.C. § 441d; and, 2) reason to believe that it had violated 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. The file will be made part of the public record within thirty days. Should you wish to submit any materials to appear on the public record, please do so within ten days.

The Commission reminds you that making expenditures (not authorized by the National Committee of a political party pursuant to 2 U.S.C. § 441a(d)) by a local party committee in connection with the general election campaign for any candidate for President of the United States nevertheless appears to be a violation of 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) and you should take immediate steps to insure that this activity does not occur in the future.

Sincerely,

  
Danny L. McDonald  
Vice Chairman for the  
Federal Election Commission

32040330015



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

May 10, 1982

Juan Whittington, Chairman  
The Democratic County Committee  
of Amelia County, Virginia  
Route 4, Box 136  
Amelia, Virginia 23002

RE: MUR 1328

Dear Mr. Whittington:

On November 3, 1980, the Commission notified you of a complaint, designated MUR 1328, alleging that your committee had violated certain sections of the Federal Election Campaign Act of 1971, as amended, or Chapters 95 and 96 of Title 26, U.S. Code.

On May 4, 1982, the Commission found: 1) no reason to believe that your Committee had violated 2 U.S.C. § 441d; and, 2) reason to believe that it had violated 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. The file will be made part of the public record within thirty days. Should you wish to submit any materials to appear on the public record, please do so within ten days.

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Sincerely,

A handwritten signature in cursive script that reads "Danny L. McDonald".

Danny L. McDonald  
Vice Chairman for the  
Federal Election Commission

32040330016



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

May 10, 1982

Dr. Van B. McCarter; Chairman  
The Democratic City Committee  
of Galax, Virginia  
212 West Center Street  
Galax, Virginia 24333

RE: MUR 1328

Dear Dr. McCarter:

On December 31, 1980, the Commission notified you of a complaint, designated MUR 1328, alleging that your committee had violated certain sections of the Federal Election Campaign Act of 1971, as amended, or Chapters 95 and 96 of Title 26, U.S. Code.

On May 4, 1982, the Commission found: 1) no reason to believe that your Committee had violated 2 U.S.C. § 441d; and, 2) reason to believe that it had violated 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. The file will be made part of the public record within thirty days. Should you wish to submit any materials to appear on the public record, please do so within ten days.

The Commission reminds you that making expenditures (not authorized by the National Committee of a political party pursuant to 2 U.S.C. § 441a(d)) by a local party committee in connection with the general election campaign for any candidate for President of the United States nevertheless appears to be a violation of 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) and you should take immediate steps to insure that this activity does not occur in the future.

Sincerely,

Danny L. McDonald  
Vice Chairman for the  
Federal Election Commission

32040330017



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

May 10, 1982

Mr. Kenneth Broon, Chairman  
The Democratic County Committee  
of Grayson County, Virginia  
Route 1, Box 45  
Fnes, Virginia 24330

RE: MUR 1328

Dear Mr. Broon:

On December 31, 1980, the Commission notified you of a complaint, designated MUR 1328, alleging that your committee had violated certain sections of the Federal Election Campaign Act of 1971, as amended, or Chapters 95 and 96 of Title 26, U.S. Code.

On May 4, 1982, the Commission found: 1) no reason to believe that your Committee had violated 2 U.S.C. § 441d; and, 2) reason to believe that it had violated 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. The file will be made part of the public record within thirty days. Should you wish to submit any materials to appear on the public record, please do so within ten days.

The Commission reminds you that making expenditures (not authorized by the National Committee of a political party pursuant to 2 U.S.C. § 441a(d)) by a local party committee in connection with the general election campaign for any candidate for President of the United States nevertheless appears to be a violation of 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) and you should take immediate steps to insure that this activity does not occur in the future.

Sincerely,

A handwritten signature in cursive script that reads "Danny L. McDonald".

Danny L. McDonald  
Vice Chairman for the  
Federal Election Commission

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

May 10, 1982

Mr. Claude A. Stokes, Jr., Chairman  
The Democratic County Committee  
of Warren County, Virginia  
1016 Virginia Avenue  
Front Royal, Virginia 22630

RE: MUR 1328

Dear Mr. Stokes:

On December 31, 1980, the Commission notified you of a complaint, designated MUR 1328, alleging that your committee had violated certain sections of the Federal Election Campaign Act of 1971, as amended, or Chapters 95 and 96 of Title 26, U.S. Code.

On May 4, 1982, the Commission found: 1) no reason to believe that your Committee had violated 2 U.S.C. § 441d; and, 2) reason to believe that it had violated 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. The file will be made part of the public record within thirty days. Should you wish to submit any materials to appear on the public record, please do so within ten days.

The Commission reminds you that making expenditures (not authorized by the National Committee of a political party pursuant to 2 U.S.C. § 441a(d)) by a local party committee in connection with the general election campaign for any candidate for President of the United States nevertheless appears to be a violation of 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) and you should take immediate steps to insure that this activity does not occur in the future.

Sincerely,

Danny L. McDonald  
Vice Chairman for the  
Federal Election Commission

32040330019



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

May 10, 1982

Ms. Virginia Hall, Chairman  
The Democratic City Committee  
of Martinsville, Virginia  
1605 Mulberry Road  
Martinsville, Virginia 24112

RE: MUR 1328

Dear Ms. Hall:

On December 31, 1,1980, the Commission notified you of a complaint, designated MUR 1328, alleging that your committee had violated certain sections of the Federal Election Campaign Act of 1971, as amended, or Chapters 95 and 96 of Title 26, U.S. Code.

On May 4, 1982, the Commission found: 1) no reason to believe that your Committee had violated 2 U.S.C. § 441d; and, 2) reason to believe that it had violated 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. The file will be made part of the public record within thirty days. Should you wish to submit any materials to appear on the public record, please do so within ten days.

The Commission reminds you that making expenditures (not authorized by the National Committee of a political party pursuant to 2 U.S.C. § 441a(d)) by a local party committee in connection with the general election campaign for any candidate for President of the United States nevertheless appears to be a violation of 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) and you should take immediate steps to insure that this activity does not occur in the future.

Sincerely,

Danny L. McDonald  
Vice Chairman for the  
Federal Election Commission

32040330020



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

May 10, 1982

Mr. F. E. Marsh, Chairman  
The Democratic County Committee  
of Henry County, Virginia  
Main Street  
Basset, Virginia 24055

RE: MUR 1328

Dear Mr. Marsh:

On December 31, 1980, the Commission notified you of a complaint, designated MUR 1328, alleging that your committee had violated certain sections of the Federal Election Campaign Act of 1971, as amended, or Chapters 95 and 96 of Title 26, U.S. Code.

On May 4, 1982, the Commission found: 1) no reason to believe that your Committee had violated 2 U.S.C. § 441d; and, 2) reason to believe that it had violated 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. The file will be made part of the public record within thirty days. Should you wish to submit any materials to appear on the public record, please do so within ten days.

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Sincerely,

Danny L. McDonald  
Vice Chairman for the  
Federal Election Commission

82040330021



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

May 10, 1982

Ms. Constance Dudley, Chairman  
The Democratic County Committee  
of Greene County, Virginia  
Route 1, Box 221K  
Standardsville, Virginia 22973

RE: MUR 1328

Dear Ms. Dudley:

On December 31, 1980, the Commission notified you of a complaint, designated MUR 1328, alleging that your committee had violated certain sections of the Federal Election Campaign Act of 1971, as amended, or Chapters 95 and 96 of Title 26, U.S. Code.

On May 4, 1982, the Commission found: 1) no reason to believe that your Committee had violated 2 U.S.C. § 441d; and, 2) reason to believe that it had violated 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. The file will be made part of the public record within thirty days. Should you wish to submit any materials to appear on the public record, please do so within ten days.

The Commission reminds you that making expenditures (not authorized by the National Committee of a political party pursuant to 2 U.S.C. § 441a(d)) by a local party committee in connection with the general election campaign for any candidate for President of the United States nevertheless appears to be a violation of 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) and you should take immediate steps to insure that this activity does not occur in the future.

Sincerely,

Danny L. McDonald  
Vice Chairman for the  
Federal Election Commission

32040330022



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 10, 1982

F. Paul Blanock, Chairman  
The Democratic County Committee  
of Mathews County, Virginia  
Mathews, Virginia 23109

RE: MUR 1328

Dear Mr. Blanock:

On December 31, 1980, the Commission notified you of a complaint, designated MUR 1328, alleging that your committee had violated certain sections of the Federal Election Campaign Act of 1971, as amended, or Chapters 95 and 96 of Title 26, U.S. Code.

On May 4, 1982, the Commission found: 1) no reason to believe that your Committee had violated 2 U.S.C. § 441d; and, 2) reason to believe that it had violated 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. The file will be made part of the public record within thirty days. Should you wish to submit any materials to appear on the public record, please do so within ten days.

The Commission reminds you that making expenditures (not authorized by the National Committee of a political party pursuant to 2 U.S.C. § 441a(d)) by a local party committee in connection with the general election campaign for any candidate for President of the United States nevertheless appears to be a violation of 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) and you should take immediate steps to insure that this activity does not occur in the future.

Sincerely,

Danny L. McDonald  
Vice Chairman for the  
Federal Election Commission

32040330023



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

May 10, 1982

Mr. C. F. Hicks, Chairman  
The Democratic County Committee  
of Gloucester County, Virginia  
Gloucester, Virginia 23061

RE: MUR 1328

Dear Mr. Hicks:

On December 31, 1980, the Commission notified you of a complaint, designated MUR 1328, alleging that your committee had violated certain sections of the Federal Election Campaign Act of 1971, as amended, or Chapters 95 and 96 of Title 26, U.S. Code.

On May 4, 1982, the Commission found: 1) no reason to believe that your Committee had violated 2 U.S.C. § 441d; and, 2) reason to believe that it had violated 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. The file will be made part of the public record within thirty days. Should you wish to submit any materials to appear on the public record, please do so within ten days.

The Commission reminds you that making expenditures (not authorized by the National Committee of a political party pursuant to 2 U.S.C. § 441a(d)) by a local party committee in connection with the general election campaign for any candidate for President of the United States nevertheless appears to be a violation of 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) and you should take immediate steps to insure that this activity does not occur in the future.

Sincerely,

A handwritten signature in cursive script that reads "Danny McDonald".

Danny L. McDonald  
Vice Chairman for the  
Federal Election Commission

82040330024



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

May 10, 1982

David A. Bowers, Esquire  
404 Shenandoah Building  
Roanoke, Virginia 24002

RE: MUR 1328

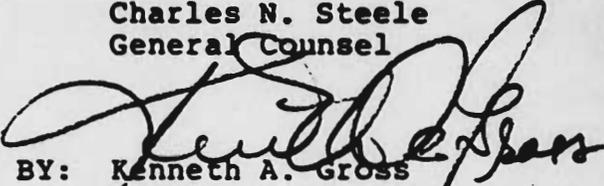
Dear Mr. Bowers:

On April 9, 1981, the Commission notified your client, the Roanoke City Democratic Committee, of a complaint alleging that your committee had violated certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission, on May 4, 1982, determined that on the basis of the information in the complaint and information provided by you, there is no reason to believe that a violation of any statute within its jurisdiction has been committed. Accordingly, the Commission closed its file in this matter. This matter will become a part of the public record within thirty days. The Roanoke City Democratic Committee has also been notified of the Commission's finding.

Sincerely,

Charles N. Steele  
General Counsel

  
BY: Kenneth A. Gross  
Associate General Counsel

82040330025



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

May 10, 1982

Prentiss Webb, Treasurer  
Roanoke City Democratic Committee  
P.O. Box 20  
Roanoke, Virginia 24002

RE: MUR 1328

Dear Mr. Webb:

On April 9, 1981, the Commission notified you of a complaint alleging that your committee had violated certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission, on May 4, 1982, determined that on the basis of the information in the complaint and information provided by your committee, there is no reason to believe that a violation of any statute within its jurisdiction has been committed. Accordingly, the Commission closed its file in this matter. This matter will become a part of the public record within thirty days.

Sincerely,

Charles N. Steele  
General Counsel

A handwritten signature in cursive script, appearing to read "Kenneth A. Gross", written over the typed name.

BY: Kenneth A. Gross  
Associate General Counsel

82040330026



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Mr. Paul Harris, Chairman  
The Democratic County Committee  
of Lee County, Virginia  
P.O. Sob 404  
Jonesville, Virginia 24263

RE: MUR 1358

Dear Mr. Harris:

On January 5, 1981, the Commission notified you of a complaint, designated MUR 1358, alleging that your committee had violated certain sections of the Federal Election Campaign Act of 1971, as amended, or Chapters 95 and 96 of Title 26, U.S. Code. The Commission merged MUR 1358 with MUR 1328.

On May 4, 1982, the Commission found: 1) no reason to believe that your Committee had violated 2 U.S.C. § 441d; and, 2) reason to believe that it had violated 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. The file will be made part of the public record within thirty days. Should you wish to submit any materials to appear on the public record, please do so within ten days.

The Commission reminds you that making expenditures (not authorized by the National Committee of a political party pursuant to 2 U.S.C. § 441a(d)) by a local party committee in connection with the general election campaign for any candidate for President of the United States nevertheless appears to be a violation of 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) and you should take immediate steps to insure that this activity does not occur in the future.

Sincerely,

82040330027

*[Handwritten signature]*



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

J. Curtis Herge, Esquire  
Sedam and Herge  
7600 Old Springhouse Road  
McLean, Virginia 22102

RE: MURs 1328 and 1358

Dear Mr. Herge:

The Federal Election Commission has reviewed the allegations of your complaints and determined that on the basis of the information provided in your complaints and information provided by the respondents, there is: 1) no reason to believe that a violation of 2 U.S.C. § 441d has been committed; and, 2) reason to believe that a violation of 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) has been committed. However, after considering the circumstances of this matter, the Commission has determined to take no further action with regard to the violation and close the file as it pertains to the respondent.

The Federal Election Campaign Act allows a complainant to seek judicial review of the Commission's action in this matter. See 2 U.S.C. § 437g(a)(8).

Should additional information come to your attention which you believe establishes a violation of the Act, you may file a complaint pursuant to the requirements set forth in 2 U.S.C. § 437g(a)(1) and 11 C.F.R. § 111.4.

Sincerely,

*JCH*

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Lawrence H. Framme, III, Esquire  
1400 Ross Building  
Richmond, Virginia 23219

RE: MUR 1328 and 1358

Dear Mr. Framme:

This letter is in regard to two complaints, designated MUR 1328 and MUR 1358, filed by the Republican Party of Virginia against your clients, the Democratic County Committee of Roanoke County, the Democratic County Committee of Orange County, the Democratic County Committee of Rappahannock County, the Democratic County Committee of Amelia County, the Democratic County Committee of Clarke County, the Democratic County Committee of Greene County, the Democratic County Committee of Gloucester County, the Democratic County Committee of Mathews County, the Democratic County Committee of Goochland County, the Democratic County Committee of Lunenburg County, the Democratic City Committee of Hopewell, the Democratic County Committee of Botetourt County, the Democratic County Committee of Henry County, the Democratic City Committee of Martinsville, the Democratic County Committee of Warren County, the Democratic City Committee of Galax, the Democratic County Committee of Grayson County, and the Democratic County Committee of Lee County. The complaints alleged that the committees had violated certain sections of the Federal Election Campaign Act of 1971, as amended. The Commission merged MUR 1358 with MUR 1328.

On May 4, 1982, the Commission found: 1) no reason to believe that these respondents had violated 2 U.S.C. § 441d; and, 2) reason to believe that they had violated 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. The file will be made part of the public record within thirty days. Should you wish to submit any materials to appear on the public record, please do so within ten days.

The Commission reminds you that making expenditures (not authorized by the National Committee of a political party pursuant to 2 U.S.C. § 441a(d)) by a local party committee in connection with the general election campaign for any candidate for President of the United States nevertheless appears to be a

32040330029

Letter to Lawrence H. Franna, III  
Page 2

violation of 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) and you should take immediate steps to insure that this activity does not occur in the future.

The respective committees have also been notified of the Commission's finding. If you have any questions, please contact Thomas J. Whitehead at (202) 523-4000.

Sincerely,

82040330030

*JG*



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Mr. Watkins Elleson, III, Chairman  
The Democratic County Committee  
of Orange County, Virginia  
P.O. Box 1080  
Orange, Virginia 22960

RE: MUR 1328

Dear Mr. Elleson:

On December 31, 1980, the Commission notified you of a complaint, designated MUR 1328, alleging that your committee had violated certain sections of the Federal Election Campaign Act of 1971, as amended, or Chapters 95 and 96 of Title 26, U.S. Code.

On May 4, 1982, the Commission found: 1) no reason to believe that your Committee had violated 2 U.S.C. § 441d; and, 2) reason to believe that it had violated 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. The file will be made part of the public record within thirty days. Should you wish to submit any materials to appear on the public record, please do so within ten days.

The Commission reminds you that making expenditures (not authorized by the National Committee of a political party pursuant to 2 U.S.C. § 441a(d)) by a local party committee in connection with the general election campaign for any candidate for President of the United States nevertheless appears to be a violation of 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) and you should take immediate steps to insure that this activity does not occur in the future.

Sincerely,

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*J*



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Mr. Claude D. Carter, Chairman  
The Democratic County Committee  
of Botetourt County, Virginia  
P.O. Box 368  
Daleville, Virginia 24083

RE: MUR 1328

Dear Mr. Carter:

On December 31, 1980, the Commission notified you of a complaint, designated MUR 1328, alleging that your committee had violated certain sections of the Federal Election Campaign Act of 1971, as amended, or Chapters 95 and 96 of Title 26, U.S. Code.

On May 4, 1982, the Commission found: 1) no reason to believe that your Committee had violated 2 U.S.C. § 441d; and, 2) reason to believe that it had violated 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. The file will be made part of the public record within thirty days. Should you wish to submit any materials to appear on the public record, please do so within ten days.

The Commission reminds you that making expenditures (not authorized by the National Committee of a political party pursuant to 2 U.S.C. § 441a(d)) by a local party committee in connection with the general election campaign for any candidate for President of the United States nevertheless appears to be a violation of 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) and you should take immediate steps to insure that this activity does not occur in the future.

Sincerely,

*JPC*

92040330032



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Mr. James Edmunds, Chairman  
The Democratic County Committee  
of Lunenburg County, Virginia  
Lunenburg County, Virginia

RE: MUR 1328

Dear Mr. Edmunds:

On December 31, 1980, the Commission notified you of a complaint, designated MUR 1328, alleging that your committee had violated certain sections of the Federal Election Campaign Act of 1971, as amended, or Chapters 95 and 96 of Title 26, U.S. Code.

On May 4, 1982, the Commission found: 1) no reason to believe that your Committee had violated 2 U.S.C. § 441d; and, 2) reason to believe that it had violated 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. The file will be made part of the public record within thirty days. Should you wish to submit any materials to appear on the public record, please do so within ten days.

The Commission reminds you that making expenditures (not authorized by the National Committee of a political party pursuant to 2 U.S.C. § 441a(d)) by a local party committee in connection with the general election campaign for any candidate for President of the United States nevertheless appears to be a violation of 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) and you should take immediate steps to insure that this activity does not occur in the future.

Sincerely,

*gpc*

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Ms. Betty Ann Saunders, Chairman  
The Democratic County Committee  
of Roanoke County, Virginia  
5134 Remington Road, S.W.  
Roanoke, Virginia 24014

RE: MUR 1328

Dear Ms. Saunders:

On December 31, 1980, the Commission notified you of a complaint, designated MUR 1328, alleging that your committee had violated certain sections of the Federal Election Campaign Act of 1971, as amended, or Chapters 95 and 96 of Title 26, U.S. Code.

On May 4, 1982, the Commission found: 1) no reason to believe that your Committee had violated 2 U.S.C. § 441d; and, 2) reason to believe that it had violated 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. The file will be made part of the public record within thirty days. Should you wish to submit any materials to appear on the public record, please do so within ten days.

The Commission reminds you that making expenditures (not authorized by the National Committee of a political party pursuant to 2 U.S.C. § 441a(d)) by a local party committee in connection with the general election campaign for any candidate for President of the United States nevertheless appears to be a violation of 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) and you should take immediate steps to insure that this activity does not occur in the future.

Sincerely,

*[Handwritten signature]*

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Ms. Heda Trana, Chairman  
The Democratic County Committee  
of Hopewell County, Virginia  
Hopewell, Virginia 23860

RE: MUR 1328

Dear Ms. Trana:

On December 31, 1980, the Commission notified you of a complaint, designated MUR 1328, alleging that your committee had violated certain sections of the Federal Election Campaign Act of 1971, as amended, or Chapters 95 and 96 of Title 26, U.S. Code.

On May 4, 1982, the Commission found: 1) no reason to believe that your Committee had violated 2 U.S.C. § 441d; and, 2) reason to believe that it had violated 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. The file will be made part of the public record within thirty days. Should you wish to submit any materials to appear on the public record, please do so within ten days.

The Commission reminds you that making expenditures (not authorized by the National Committee of a political party pursuant to 2 U.S.C. § 441a(d)) by a local party committee in connection with the general election campaign for any candidate for President of the United States nevertheless appears to be a violation of 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) and you should take immediate steps to insure that this activity does not occur in the future.

Sincerely,

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Mrs. Dorothy Bowles, Chairman  
The Democratic County Committee  
of Goochland County, Virginia  
Kents Store, Virginia 23084

RE: MUR 1328

Dear Mrs. Bowles:

On December 31, 1980, the Commission notified you of a complaint, designated MUR 1328, alleging that your committee had violated certain sections of the Federal Election Campaign Act of 1971, as amended, or Chapters 95 and 96 of Title 26, U.S. Code.

On May 4, 1982, the Commission found: 1) no reason to believe that your Committee had violated 2 U.S.C. § 441d; and, 2) reason to believe that it had violated 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. The file will be made part of the public record within thirty days. Should you wish to submit any materials to appear on the public record, please do so within ten days.

The Commission reminds you that making expenditures (not authorized by the National Committee of a political party pursuant to 2 U.S.C. § 441a(d)) by a local party committee in connection with the general election campaign for any candidate for President of the United States nevertheless appears to be a violation of 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) and you should take immediate steps to insure that this activity does not occur in the future.

Sincerely,

32040330036

*2/20*



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Lawrence White, Chairman  
The Democratic County Committee  
of Clarke County, Virginia  
Battleton Drive  
Berryville, Virginia 22611

RE: MUR 1328

Dear Mr. White:

On November 3, 1980, the Commission notified you of a complaint, designated MUR 1328, alleging that your committee had violated certain sections of the Federal Election Campaign Act of 1971, as amended, or Chapters 95 and 96 of Title 26, U.S. Code.

On May 4, 1982, the Commission found: 1) no reason to believe that your Committee had violated 2 U.S.C. § 441d; and, 2) reason to believe that it had violated 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. The file will be made part of the public record within thirty days. Should you wish to submit any materials to appear on the public record, please do so within ten days.

The Commission reminds you that making expenditures (not authorized by the National Committee of a political party pursuant to 2 U.S.C. § 441a(d)) by a local party committee in connection with the general election campaign for any candidate for President of the United States nevertheless appears to be a violation of 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) and you should take immediate steps to insure that this activity does not occur in the future.

Sincerely,

82040330037

*J. J. [unclear]*



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

A. H. Keyesen, Chairman  
The Democratic County Committee  
of Rappahannock County, Virginia  
Washington, Virginia 22747

RE: MUR 1328

Dear Mr. Keyesen:

On November 3, 1980, the Commission notified you of a complaint, designated MUR 1328, alleging that your committee had violated certain sections of the Federal Election Campaign Act of 1971, as amended, or Chapters 95 and 96 of Title 26, U.S. Code.

On May 4, 1982, the Commission found: 1) no reason to believe that your Committee had violated 2 U.S.C. § 441d; and, 2) reason to believe that it had violated 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. The file will be made part of the public record within thirty days. Should you wish to submit any materials to appear on the public record, please do so within ten days.

The Commission reminds you that making expenditures (not authorized by the National Committee of a political party pursuant to 2 U.S.C. § 441a(d)) by a local party committee in connection with the general election campaign for any candidate for President of the United States nevertheless appears to be a violation of 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) and you should take immediate steps to insure that this activity does not occur in the future.

Sincerely,

*JFW*

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Juan Whittington, Chairman  
The Democratic County Committee  
of Amelia County, Virginia  
Route 4, Box 136  
Amelia, Virginia 23002

RE: MUR 1328

Dear Mr. Whittington:

On November 3, 1980, the Commission notified you of a complaint, designated MUR 1328, alleging that your committee had violated certain sections of the Federal Election Campaign Act of 1971, as amended, or Chapters 95 and 96 of Title 26, U.S. Code.

On May 4, 1982, the Commission found: 1) no reason to believe that your Committee had violated 2 U.S.C. § 441d; and, 2) reason to believe that it had violated 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. The file will be made part of the public record within thirty days. Should you wish to submit any materials to appear on the public record, please do so within ten days.

The Commission reminds you that making expenditures (not authorized by the National Committee of a political party pursuant to 2 U.S.C. § 441a(d)) by a local party committee in connection with the general election campaign for any candidate for President of the United States nevertheless appears to be a violation of 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) and you should take immediate steps to insure that this activity does not occur in the future.

Sincerely,

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*JFW*



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Dr. Van B. McCarter; Chairman  
The Democratic City Committee  
of Galax, Virginia  
212 West Center Street  
Galax, Virginia 24333

RE: MUR 1328

Dear Dr. McCarter:

On December 31, 1980, the Commission notified you of a complaint, designated MUR 1328, alleging that your committee had violated certain sections of the Federal Election Campaign Act of 1971, as amended, or Chapters 95 and 96 of Title 26, U.S. Code.

On May 4, 1982, the Commission found: 1) no reason to believe that your Committee had violated 2 U.S.C. § 441d; and, 2) reason to believe that it had violated 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. The file will be made part of the public record within thirty days. Should you wish to submit any materials to appear on the public record, please do so within ten days.

The Commission reminds you that making expenditures (not authorized by the National Committee of a political party pursuant to 2 U.S.C. § 441a(d)) by a local party committee in connection with the general election campaign for any candidate for President of the United States nevertheless appears to be a violation of 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) and you should take immediate steps to insure that this activity does not occur in the future.

Sincerely,

*J. J. [unclear]*

32040330040



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Mr. Kenneth Broon, Chairman  
The Democratic County Committee  
of Grayson County, Virginia  
Route 1, Box 45  
Fnes, Virginia 24330

RE: MUR 1328

Dear Mr. Broon:

On December 31, 1980, the Commission notified you of a complaint, designated MUR 1328, alleging that your committee had violated certain sections of the Federal Election Campaign Act of 1971, as amended, or Chapters 95 and 96 of Title 26, U.S. Code.

On May 4, 1982, the Commission found: 1) no reason to believe that your Committee had violated 2 U.S.C. § 441d; and, 2) reason to believe that it had violated 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. The file will be made part of the public record within thirty days. Should you wish to submit any materials to appear on the public record, please do so within ten days.

The Commission reminds you that making expenditures (not authorized by the National Committee of a political party pursuant to 2 U.S.C. § 441a(d)) by a local party committee in connection with the general election campaign for any candidate for President of the United States nevertheless appears to be a violation of 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) and you should take immediate steps to insure that this activity does not occur in the future.

Sincerely,

*Handwritten initials*

32040330041



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Mr. Claude A. Stokes, Jr., Chairman  
The Democratic County Committee  
of Warren County, Virginia  
1016 Virginia Avenue  
Front Royal, Virginia 22630

RE: MUR 1328

Dear Mr. Stokes:

On December 31, 1980, the Commission notified you of a complaint, designated MUR 1328, alleging that your committee had violated certain sections of the Federal Election Campaign Act of 1971, as amended, or Chapters 95 and 96 of Title 26, U.S. Code.

On May 4, 1982, the Commission found: 1) no reason to believe that your Committee had violated 2 U.S.C. § 441d; and, 2) reason to believe that it had violated 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. The file will be made part of the public record within thirty days. Should you wish to submit any materials to appear on the public record, please do so within ten days.

The Commission reminds you that making expenditures (not authorized by the National Committee of a political party pursuant to 2 U.S.C. § 441a(d)) by a local party committee in connection with the general election campaign for any candidate for President of the United States nevertheless appears to be a violation of 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) and you should take immediate steps to insure that this activity does not occur in the future.

Sincerely,

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*2/21*



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Ms. Virginia Hall, Chairman  
The Democratic City Committee  
of Martinsville, Virginia  
1605 Mulberry Road  
Martinsville, Virginia 24112

RE: MUR 1328

Dear Ms. Hall:

On December 31, 1,1980, the Commission notified you of a complaint, designated MUR 1328, alleging that your committee had violated certain sections of the Federal Election Campaign Act of 1971, as amended, or Chapters 95 and 96 of Title 26, U.S. Code.

On May 4, 1982, the Commission found: 1) no reason to believe that your Committee had violated 2 U.S.C. § 441d; and, 2) reason to believe that it had violated 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. The file will be made part of the public record within thirty days. Should you wish to submit any materials to appear on the public record, please do so within ten days.

The Commission reminds you that making expenditures (not authorized by the National Committee of a political party pursuant to 2 U.S.C. § 441a(d)) by a local party committee in connection with the general election campaign for any candidate for President of the United States nevertheless appears to be a violation of 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) and you should take immediate steps to insure that this activity does not occur in the future.

Sincerely,

*[Handwritten signature]*

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Mr. F. E. Marsh, Chairman  
The Democratic County Committee  
of Henry County, Virginia  
Main Street  
Basset, Virginia 24055

RE: MUR 1328

Dear Mr. Marsh:

On December 31, 1980, the Commission notified you of a complaint, designated MUR 1328, alleging that your committee had violated certain sections of the Federal Election Campaign Act of 1971, as amended, or Chapters 95 and 96 of Title 26, U.S. Code.

On May 4, 1982, the Commission found: 1) no reason to believe that your Committee had violated 2 U.S.C. § 441d; and, 2) reason to believe that it had violated 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. The file will be made part of the public record within thirty days. Should you wish to submit any materials to appear on the public record, please do so within ten days.

The Commission reminds you that making expenditures (not authorized by the National Committee of a political party pursuant to 2 U.S.C. § 441a(d)) by a local party committee in connection with the general election campaign for any candidate for President of the United States nevertheless appears to be a violation of 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) and you should take immediate steps to insure that this activity does not occur in the future.

Sincerely,

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Ms. Constance Dudley, Chairman  
The Democratic County Committee  
of Greene County, Virginia  
Route 1, Box 221K  
Standardsville, Virginia 22973

RE: MUR 1328

Dear Ms. Dudley:

On December 31, 1980, the Commission notified you of a complaint, designated MUR 1328, alleging that your committee had violated certain sections of the Federal Election Campaign Act of 1971, as amended, or Chapters 95 and 96 of Title 26, U.S. Code.

On May 4, 1982, the Commission found: 1) no reason to believe that your Committee had violated 2 U.S.C. § 441d; and, 2) reason to believe that it had violated 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. The file will be made part of the public record within thirty days. Should you wish to submit any materials to appear on the public record, please do so within ten days.

The Commission reminds you that making expenditures (not authorized by the National Committee of a political party pursuant to 2 U.S.C. § 441a(d)) by a local party committee in connection with the general election campaign for any candidate for President of the United States nevertheless appears to be a violation of 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) and you should take immediate steps to insure that this activity does not occur in the future.

Sincerely,

*JFW*

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

F. Paul Blanock, Chairman  
The Democratic County Committee  
of Mathews County, Virginia  
Mathews, Virginia 23109

RE: MUR 1328

Dear Mr. Blanock:

On December 31, 1980, the Commission notified you of a complaint, designated MUR 1328, alleging that your committee had violated certain sections of the Federal Election Campaign Act of 1971, as amended, or Chapters 95 and 96 of Title 26, U.S. Code.

On May 4, 1982, the Commission found: 1) no reason to believe that your Committee had violated 2 U.S.C. § 441d; and, 2) reason to believe that it had violated 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. The file will be made part of the public record within thirty days. Should you wish to submit any materials to appear on the public record, please do so within ten days.

The Commission reminds you that making expenditures (not authorized by the National Committee of a political party pursuant to 2 U.S.C. § 441a(d)) by a local party committee in connection with the general election campaign for any candidate for President of the United States nevertheless appears to be a violation of 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) and you should take immediate steps to insure that this activity does not occur in the future.

Sincerely,

*Jgw*

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Mr. C. F. Hicks, Chairman  
The Democratic County Committee  
of Gloucester County, Virginia  
Gloucester, Virginia 23061

RE: MUR 1328

Dear Mr. Hicks:

On December 31, 1980, the Commission notified you of a complaint, designated MUR 1328, alleging that your committee had violated certain sections of the Federal Election Campaign Act of 1971, as amended, or Chapters 95 and 96 of Title 26, U.S. Code.

On May 4, 1982, the Commission found: 1) no reason to believe that your Committee had violated 2 U.S.C. § 441d; and, 2) reason to believe that it had violated 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. The file will be made part of the public record within thirty days. Should you wish to submit any materials to appear on the public record, please do so within ten days.

The Commission reminds you that making expenditures (not authorized by the National Committee of a political party pursuant to 2 U.S.C. § 441a(d)) by a local party committee in connection with the general election campaign for any candidate for President of the United States nevertheless appears to be a violation of 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) and you should take immediate steps to insure that this activity does not occur in the future.

Sincerely,

*JFW*

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

David A. Bowers, Esquire  
404 Shenandoah Building  
Roanoke, Virginia 24002

RE: MUR 1328

Dear Mr. Bowers:

On April 9, 1981, the Commission notified your client, the Roanoke City Democratic Committee, of a complaint alleging that your committee had violated certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission, on May 4, 1982, determined that on the basis of the information in the complaint and information provided by you, there is no reason to believe that a violation of any statute within its jurisdiction has been committed. Accordingly, the Commission closed its file in this matter. This matter will become a part of the public record within thirty days. The Roanoke City Democratic Committee has also been notified of the Commission's finding.

Sincerely,

Charles N. Steele  
General Counsel

BY: Kenneth A. Gross  
Associate General Counsel

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*JAW*



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Prentiss Webb, Treasurer  
Roanoke City Democratic Committee  
P.O. Box 20  
Roanoke, Virginia 24002

RE: MUR 1328

Dear Mr. Webb:

On April 9, 1981, the Commission notified you of a complaint alleging that your committee had violated certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission, on May 4, 1982, determined that on the basis of the information in the complaint and information provided by your committee, there is no reason to believe that a violation of any statute within its jurisdiction has been committed. Accordingly, the Commission closed its file in this matter. This matter will become a part of the public record within thirty days.

Sincerely,

Charles N. Steele  
General Counsel

BY: Kenneth A. Gross  
Associate General Counsel

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*Handwritten signature or initials*

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of ) MUR 1328  
)  
The Democratic County )  
Committee of Rappahannock ) and  
County, Virginia, et al. ) MUR 1358

CERTIFICATION

I, Marjorie W. Emmons, Recording Secretary for the Federal Election Commission Executive Session on May 4, 1982, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in the above-captioned matter:

1. merge MUR 1358 with MUR 1328;
2. find no reason to believe that the Roanoke County Democratic Committee or the Orange County Democratic Committee violated the Federal Election Campaign Act of 1971, as amended, because there is no evidence that they made an expenditure in the general election advocating the election of Jimmy Carter and Walter Mondale.
3. find that with regard to the Democratic County Committee of Rappahannock County, the Democratic County Committee of Amelia County, The Democratic County Committee of Clarke County, the Democratic County Committee of Greene County, the Democratic County Committee of Gloucester County, the Democratic County Committee of Mathews County, the Democratic County Committee of Goochland County, the Democratic County Committee of Lunenburg County, the Democratic City Committee of Hopewell, the Democratic County Committee of Henry County, the Democratic City Committee of Martinsville, the Democratic County Committee of Warren County, the Democratic City Committee of Galax, the Democratic County Committee of Grayson County, the Democratic County Committee of Lee County, and the Roanoke City Democratic Committee,
  - a) reason to believe that each violated 2 U.S.C. §441a and 11 C.F.R. §110.7(a) and (b) by making an expenditure in the general election advocating the election of Jimmy Carter and Walter Mondale;

(Continued)

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- b) no reason to believe that each violated  
2 U.S.C. §441d and 11 C.F.R. §110.11 for  
failure to affix an adequate notice on their  
respective advertisements.
- 4. Take no further action and close the file.
- 5. Send the letters attached to the General Counsel's  
April 21, 1982 report in this matter.

Commissioners Aikens, Elliott, Harris, McDonald, McGarry, and Reiche  
voted affirmatively for the decision.

Attest:

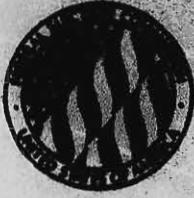
5-5-82

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary of the Commission

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES N. STEELE, GENERAL COUNSEL  
FROM: MARJORIE W. ~~ELKINS~~ / JODY CUSTER  
DATE: April 23, 1982  
SUBJECT: OBJECTION - MOR 1328 & 1358 - GENERAL  
COUNSEL'S REPORT signed 4-21-82;  
Received in OCS, 4-22-82, 9:54

The above-named document was circulated to the Commission on a 48 hour basis on April 22, 1982 at 4:00.

Commissioner Aikens submitted an objection on April 23, 1982 at 3:45.

This matter will be placed on the agenda for the Executive Session of May 4, 1982.

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April 22, 1982

**MEMORANDUM TO:** Marjorie Emmons  
**FROM:** Steven Barndollar  
**SUBJECT:** MUR 2328 & 1358

Please have the attached General Counsel's Report distributed to the Commission on a 48 hour tally basis.  
Thank you.

Attachment

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**SENSITIVE**

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED  
OFFICE OF THE  
COMMISSION SECRETARY

In the Matter of	)	
	)	MUR 1328
	)	
The Democratic County	)	and
Committee of Rappahannock	)	
County, Virginia <u>et al.</u>	)	MUR 1358

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GENERAL COUNSEL'S REPORT

I. Statement of Facts

By letters dated October 30, 1980, and December 10, 1980, the Republican Party of Virginia (Complainant) filed a complaint (see Attachments I and II), against the following Virginia Democratic committees:

- a) the Democratic County Committee of Rappahannock County;
- b) the Democratic County Committee of Amelia County;
- c) the Democratic County Committee of Clarke County;
- d) the Democratic County Committee of Roanoke County;
- e) the Democratic County Committee of Greene County;
- f) the Democratic County Committee of Orange County;
- g) the Democratic County Committee of Gloucester County;
- h) the Democratic County Committee of Mathews County;
- i) the Democratic County Committee of Goochland County;
- j) the Democratic County Committee of Lunenburg County;
- k) the Democratic City Committee of Hopewell;
- l) the Democratic County Committee of Botetourt County;
- m) the Democratic County Committee of Henry County;
- n) the Democratic City Committee of Martinsville;
- o) the Democratic County Committee of Warren County;

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- p) the Democratic City Committee of Galax; and,
- q) the Democratic County Committee of Grayson County; Virginia.

In addition to the complaint and addendum mentioned above, the complainant filed an additional complaint by letter of December 27, 1980, against the Democratic County Committee of Lee County, Virginia (see Attachment III). The facts and issues presented in the later complaint are similar to the facts and issues presented by the earlier complaint, except that the advertisements in question were radio advertisements rather than newspaper advertisements; the later complaint became MUR 1358. The Office of General Counsel is recommending that MUR 1358 be merged with MUR 1328. Both matters will be considered in this report.

The complaints allege that the respondents placed advertisements in their respective county newspapers or on the radio that expressly advocated the election to federal office of clearly identifiable candidates -- President Carter and Walter Mondale. Attached to the complaints are copies of many of the advertisements in question (see Attachments I, II and II); it is the complainant's contention that the notices printed on or broadcast with these advertisements are in violation of 2 U.S.C. § 441d, because they fail to state who paid for the advertisements. Furthermore, this notice implies that the expenditures in question were neither authorized by nor reported by the Democratic National Committee (DNC) and thus not valid party expenditures made pursuant to 2 U.S.C. § 441a(d).

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The respondents replied, through counsel, to the allegations made by the complainant by letters of December 8, 1980 and January 20, 1981. (See Attachment IV). It is the respondents' contention that the advertisements in question were placed in newspapers of limited circulation, and that the respondents had no intent to violate the Act. In addition to the general defense, the response sets forth facts that are pertinent to the various individual respondents. Of those individual responses, only those facts set forth by the Roanoke County Democratic Committee and the Orange County Democratic Committee are significant.

The Roanoke County Democratic Committee contends that it did not place the advertisement attached to the complaint. Rather, it states that the Roanoke City Democratic Committee placed the advertisement and that the Roanoke City Democratic Committee and the Roanoke County Democratic Committee are two separate and distinct organizations. Exhibit "A" of the complainants December 10, 1980 letter (See Attachment II), is a copy of the newspaper advertisement in question. The § 441d notice that appears on this advertisement states "by authority of Prentis Webb, Treasurer, Roanoke City Democratic Committee (emphasis added). Thus, the evidence indicates that the wrong committee was named as a respondent by the complainant. On April 9, 1981, the Office of General Counsel served the Roanoke City Democratic Committee with a copy of the complaint making it a respondent in this matter.

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The Orange County Democratic Committee (Orange County) contends that it neither placed an advertisement nor authorized the placement of any advertisement advocating the election of a presidential candidate in the 1980 election and points to the fact that the complainant has not brought forth any supporting documentary evidence. However, Orange County states that two individual members of the committee placed and paid for, as individuals, and without consulting with Orange County, an advertisement advocating the re-election of Jimmy Carter and Walter Mondale; such advertisement was not forwarded by the Committee.

Orange County is correct in stating that the complainant was unable to document its allegations that Orange County authorized, sponsored, or paid for an advertisement advocating the re-election of Jimmy Carter and Walter Mondale. The complainant's allegation is unsubstantiated by any supporting evidence and is specifically denied by Orange County, which in addition to denying the allegation, gives a credible explanation of who did sponsor an advertisement in Orange County advocating Jimmy Carter's re-election.

II. Factual and Legal Analysis

Since the evidence indicates that the Roanoke County Democratic Committee and the Orange County Democratic Committee did not place any advertisements, the Office of General Counsel

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recommends that the Commission find no reason to believe that they violated the Federal Election Campaign Act of 1971, as amended. The following analysis pertains to the remainder of the respondents who did place advertisements.

Party Expenditure

Under 2 U.S.C. § 441a(d)(1), "...the national committee of a political party and a State committee of a political party, including any subordinate committee of a State committee, may make expenditures in connection with the general election campaign of candidates for Federal office...". If the expenditures are made, however, by a state committee or a subordinate committee of a state committee, the state committee or subordinate committee must be designated by the national committee as its agent (emphasis added). See 11 C.F.R. § 110.7(a)(4) and AO 1980-87.

In the matter at hand, the respondents are all subordinate committees of the Democratic Party of Virginia, and most of them made expenditures in connection with the general election campaign of Jimmy Carter and Walter Mondale -- candidates for federal office. According to the respondents and according to the DNC (see Attachment IV and V), the respondent made these expenditures as the designated agents of the DNC, pursuant to a ratification agreement entered into by the parties. The letters of March 10, 1981 and March 26, 1981 (Attachment V) taken together are meant to constitute a ratification of the prior acts of the respondent

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committees. The Commission, however, has previously concluded these ratification agreements are not sufficient to satisfy the agency requirements of 11 C.F.R. § 110.7(a)(4).

Party committees, including subordinate committees, are not permitted to make independent expenditures because of the close relationship between a party and its candidates. To do so would violate 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b).

All the expenditures in question are below \$1,000. On the basis of 26 U.S.C. § 9012(f), these committees may have believed that they could have made expenditures up to \$1,000. 26 U.S.C. § 9012(f) prohibits expenditures in excess of \$1,000 by "any political committee which is not an authorized committee with respect to the eligible candidates of a political party for President and Vice President in a Presidential election" which would constitute qualified campaign expenses if incurred by the candidate's authorized committee. Under the Presidential Election Campaign Fund Act, the term

"political committee" means any committee, association, or organization (whether or not incorporated) which accepts contributions or makes expenditures for the purpose of influencing, or attempting to influence, the nomination or election of one or more individuals to Federal, State, or local

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elective public office. 26 U.S.C.  
§ 9002(9). 1/

Party committees, such as these respondents, could have relied upon § 9012(f)'s prohibition on expenditures exceeding \$1,000, as a grant of permission to all political committees, including party committees, to spend up to \$1,000 in support of a Presidential candidate in a general election. The

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1/ We are aware that 11 C.F.R. § 9002.9 contains an exception, for the purposes of § 9012(f), to the definition of political committee found at 26 U.S.C. § 9002(9); the regulation states that for the purpose of § 9012(f) the term "political committee" shall be defined in accordance with 11 C.F.R. § 100.5, a more narrow definition of political committee. The Commission's purpose in including this exception was to make clear that it was not asserting jurisdiction over entities not involved in Federal elections. It is arguable that some of the local party entities in question are not political committees under the narrower definitions found at § 100.5(c), since they may not have made "expenditures aggregating in excess of \$1,000 during the calendar year." 11 C.F.R. § 100.5(c). It is our view that the result reached with regard to these Committees would be the same regardless of which definition is used. Under the narrower definition found at § 100.5(c), a local party entity making expenditures of up to \$1,000 would not be a political committee and therefore 26 U.S.C. § 9012(f) would not apply. Under the broader definition of political committee found at 26 U.S.C. § 9002(9), a local party committee may have relied on § 9012(f) as authority to spend up to \$1,000 on behalf of a publicly funded presidential candidate. Thus, if § 9012(f) applies to party committees, under either definition of political committee, no local party committee would be permitted to spend more than \$1,000 on behalf of a presidential candidate who accepted public funding. The Commission need not decide whether party committees are covered by § 9012(f). Rather, as set forth, infra, the confusion over definitions and the regulations supports the conclusion that the Commission should take no action against a party committee making expenditures of up to \$1,000.

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Commission explicitly adopted this view with respect to party committees in its 1977 regulations. 11 C.F.R. § 110.7(b)(5) stated:

Any expenditures by a State, county, city or congressional district committee of a political party, the primary purpose of which is to further the general election campaign of that party's nominee or nominees, that also furthers the general election campaign of that party's candidates for President and Vice President shall not constitute the making of a contribution or expenditure to a Federal candidate as long as the expenditure does not exceed \$1,000 per such committee. Such expenditures shall not count toward the limits of § 110.7(a), (b)(1) and (b)(2).

The explanation and justification for this regulation cast additional light on this provision:

[S]ubordinate state party committees may make coordinated or uncoordinated expenditures of up to \$1,000 on behalf of the party's Presidential ticket. These expenditures are reported to the Presidential candidate's principal campaign committee but do not count against any spending limitations. This provision is derived from 26 U.S.C. § 9012(f).

While it is true that the Commission in its 1980 regulations deleted § 110.7(b)(5), it did so without any explanation.

This argument is not affected by the Supreme Court's equally divided affirmance in Federal Election Commission v. Americans for Change, 512 F.Supp. 489 (D.D.C. 1980), aff'd, 50 U.S.L.W. 4168 (January 19, 1982). That case dealt with independent expenditures, which party committees may not make. Moreover, regardless of the effect of the court's decision, it remains that party committees, such as the Committees in

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question, may have interpreted § 9012(f), particularly because of the Commission's 1977 regulation, as permitting expenditures whether coordinated or not of up to \$1,000 on behalf of Presidential candidates.

While it is conceivable that this provision is no longer necessary for party committees because of the numerous exemptions for local party activity contained in the 1979 amendments, it would seem inadvisable to pursue local party committees for violations if their expenditures amounted to less than \$1,000. The ambiguity of the statutory language and the fact that local party committees may have interpreted § 9012(f) to permit expenditures of up to \$1,000 to further the election of their Presidential candidate militate against further Commission action against these respondents except for a finding of reason to believe that they have violated 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b).

Notice Provision

2 U.S.C. § 441d(a) (3) states that:

Whenever any person makes an expenditure for the purpose of financing communications expressly advocating the election or defeat of a clearly identified candidate or solicits any contribution through any broadcasting station, newspaper, magazine, outdoor advertising facility, direct mailing or any other type of general public political advertising such communication - if not authorized by a candidate, an authorized political committee of a candidate, or its agents, shall clearly state the name of the person who paid for the communication and state that the communication is not authorized by any candidate or candidate's committee. (emphasis added)

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The advertisements used by the respondents expressly advocate the re-election of Jimmy Carter and Walter Mondale by using such words as "re-elect", "vote for", "elect", or "vote". The advertisements contain a statement that clearly says the advertisement was either paid for or authorized by the local committee. None of the advertisements contain, however, a statement that the advertisement was authorized by the Carter/Mondale Committee as required by 2 U.S.C. § 441d(a)(3). However, there is a discrepancy between the requirements of 2 U.S.C. § 441d(a)(3) and 11 C.F.R. § 110.11(a)(1)(iv) concerning the notification requirements of unauthorized expenditures. The statute requires both a statement of non-authorization and listing of the person paying for the communication. The regulation requires only a statement listing the committee that paid for the communication. The regulation states, "Such communication, if paid for and authorized by a political committee, other than an authorized committee of a candidate(s), shall clearly state that the communication has been paid for by such political committee."

It should be added that all the advertisements in question clearly and conspicuously state that they were paid for or authorized by the local committee in question. It is apparent that there was no attempt to deceive the public, for the reader would certainly understand that the various Committees paid for each advertisement. Furthermore, the amount of the expenditure involved is small, with none exceeding \$200. Therefore, it is the Office of General Counsel's recommendation that the

Commission find no reason to believe that the respondents violated 2 U.S.C. § 441d and 11 C.F.R. § 110.11.

**IV. Recommendations**

The Office of General Counsel recommends that the Commission:

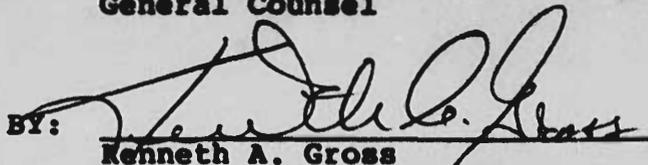
1. the Commission merge MUR 1358 with MUR 1328;
2. the Commission find no reason to believe that the Roanoke County Democratic Committee or the Orange County Democratic Committee violated the Federal Election Campaign Act of 1971, as amended, because there is no evidence that they made an expenditure in the general election advocating the election of Jimmy Carter and Walter Mondale.
3. the Commission, with regard to the Democratic County Committee of Rappahannock County, the Democratic County Committee of Amelia County, the Democratic County Committee of Clarke County, the Democratic County Committee of Greene County, the Democratic County Committee of Gloucester County, the Democratic County Committee of Mathews County, the Democratic County Committee of Goochland County, the Democratic County Committee of Lunenburg County, the Democratic City Committee of Hopewell, the Democratic County Committee of Botetourt County, the Democratic County Committee of Henry County, the Democratic City Committee of Martinsville, the Democratic County Committee of Warren County, the Democratic City Committee of Galax, the Democratic County Committee of Grayson County, the Democratic County Committee of Lee County, and the Roanoke City Democratic Committee,
  - a) find reason to believe that each violated 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) by making an expenditure in the general election advocating the election of Jimmy Carter and Walter Mondale;
  - b) find no reason to believe that each violated 2 U.S.C. § 441d and 11 C.F.R. § 110.11 for failure to affix an adequate notice on their respective advertisements.

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4. Take no further action and close the file.
5. Send attached letters.

Charles N. Steele  
General Counsel

April 21, 1982  
Date

BY:   
Kenneth A. Gross  
Associate General Counsel

Attachments

- I. Complaint
- II. Addendum to complaint
- III. Complaint against Lee County
- IV. Respondent's response to complaints
- V. Letter of DNC
- VI. Letter to respondents
- VII. Letter to complainant

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CCC-3190

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**SEDAM & HERGE**  
A PROFESSIONAL CORPORATION  
ATTORNEYS AT LAW  
7600 OLD SPRINGHOUSE ROAD  
MCLEAN, VIRGINIA 22108

GLENN J. SEDAM, JR.  
J. CURTIS HERGE

(703) 821-1000

1700 PENNSYLVANIA AVENUE, N.W.  
WASHINGTON, D.C. 20006  
(202) 393-7124

ROBERT R. SPARKS, JR.  
MICHAEL D. HUGHES  
A. MARK CHRISTOPHER  
KAREN LUSSEN BLAIR  
JOHN ROBERT CLARK III  
J. STANLEY PAYNE, JR.

October 30, 1980

TWX/TELEX: 710-831-0896  
CABLE: SEDAMHERGE

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

0 OCT 31 P 2:05

GENERAL

Dear Member of the Commission:

This letter constitutes a complaint filed on behalf of our client, the Republican Party of Virginia, 119 East Grace Street, Richmond, Virginia 23219, a political committee as defined under 2 U.S.C. §431(c), against the Democratic County Committee of Rappahannock County, Virginia, Mr. A. H. Keyser, Chairman, Washington, Virginia 22747; Democratic County Committee of Amelia County, Virginia, Mr. Juan Whittington, Chairman, Route 4, Box 136, Amelia, Virginia 23002; and, the Democratic County Committee of Clarke County, Virginia, Mr. Lawrence White, Chairman, Battleton Drive, Berryville, Virginia 22611.

Attached hereto as Exhibit A is a copy of The Rappahannock News of Thursday, October 16, 1980. You will note that, on page 3, there is a two column advertisement advocating the election of Jimmy Carter as President. Please note that the advertisement bears a disclaimer, pursuant to 2 U.S.C. §441(d), which states that the advertisement was placed by authority of Edward Baily, Treasurer of the Rappahannock Democratic Party.

Upon information and belief, similar newspaper advertisements were published in local newspapers in Amelia and Clarke Counties, Virginia, by the respective Democratic County Committees in those localities.

(I/O)

8 2 0 4 0 3 3 0 0 6 6

2 U.S.C. §441(a)(d)(1) states in applicable part,  
that:

"a national committee of a political party and a state committee of a political party, including any subordinate committee of a state committee may make expenditures in connection with the general election campaign of candidates for federal office..."

National party committees are limited by 2 U.S.C. §441(a)(d)(2), 11 CFR 110.7(a)(1) and (2), to "expenditures which do not exceed an amount equal to 2 cents multiplied by the voting age population of the United States..."

11 CFR 110.7(a)(4) states that:

"The National Committee of a political party may make expenditures authorized by this section through any agent, including state and subordinate party committees."

In AO 1980-87, the Federal Election Commission determined that the provisions of the Federal Election Campaign Act, and the Regulations promulgated by the Commission, which are cited above, restrict the activities of local party committees, so that expenditures for newspaper advertisements in support of presidential and vice presidential candidates can only be made if authorized and reported by the national committee.

The advertisement disclaimer implies that the advertisement was not paid for by the Democratic County Committees of Amelia, Clarke, and Rappahannock Counties as agents of the Democratic National Committee. If the Democratic National Committee neither authorized nor reported the expenditures for the newspaper advertisement, the expenditures were made in violation of the Federal Election Campaign Laws.

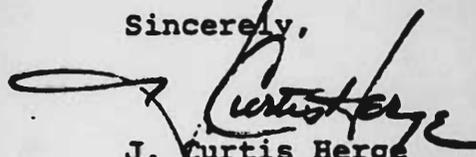
(I) 2

82040330067

General Counsel  
Page Two  
October 30, 1980

Your prompt attention to this complaint would be appreciated.

Sincerely,



J. Curtis Herge  
Counsel for the Republican  
Party of Virginia

Subscribed and sworn to  
before me this 30<sup>th</sup> day  
of October, 1980.

Winifred Rolly  
Notary Public

My commission expires: 2/6/84

Attachment

(1) 3

32040330068

**In en**  
**Spark Theatre**

The cast and other persons involved in the production of Gilbert and Sullivan's *His Majesty* have recently discussed the possibility of forming a local theatre group with special emphasis on an annual benefit performance for the Rappahannock County Library.

According to library board chairman Mary Jamison, the three night run of *His Majesty* on October 2, 3, and 4 shared between \$1,200 and \$1,400 for the library.

A meeting has been set for Thursday, November 6, at 7:30 p.m. in the library. Anyone interested in joining the group or planning to make a contribution to the goals of local theatrical productions is invited to participate in this first organizational session.

**ANS**

we have parryville's on raise too when needed

number 1. Express to Essex sponsor as in the first

on from 11. on the ends will create the is provided The Youth do across Warrenton.

at. scheduled p.m. the string for able time. members for Athlete to Estbank. Ten from at Baldwin 4 Case at Johnson at to 10th at Look at 197-lylar at 197- of donations

**NAACP Meeting**

The Rappahannock NAACP Branch will meet Monday, October 20, at 7:30 p.m. at the First Baptist Church dining hall in Washington. Important business will be discussed and all members are urged to attend.

**Christmas Mart**

The annual Christmas Mart sponsored by the Manassas Art Guild is scheduled for November 15 and 16 at Levi Anderson and Aqueduct on Route 26 at Manassas. Hours are from 10 a.m. to 5 p.m. A spiritual gathering of artists and craftsmen will display their unique talents for the viewing and shopping pleasure of all.

**Revue Tickets Available**

Due to limited seating at the Mountain Magic Theatre, those wishing to attend the 1980 Rappahannock All-Star Revue on Saturday, November 1, should purchase their tickets this week at Nature's Foods or Surman Cards School in Washington, or at the Fire House Market in Warrenton. Tickets can also be reserved by calling the school at 675-3257, days.



**CUB OLYMPIANS** received a standing ovation at Friday's awards ceremony for their performance in recent regional games. Marc Wiley (left) won a first place ribbon in the 50 yard dash for ten-year-olds and Jerry Eldred (center) won another first place ribbon for all-ups in the nine year old group. Eric Robinson (right) brought home a facial of ribbons and the prestigious gold medal for overall achievement among eight-year-olds. The Rappahannock youngsters competed against teams from nine counties at the games.

**CHRISTMAS PORTRAITS**



Come in now... Before the holiday rush for your Gift Portraits. Nothing is a more treasured gift than a picture.

For An Appointment Call 825-1880

ALAN'S

**S U P P O R T**  
**HE WORKS FOR YOU**  
**T H E**  
**High and Low**

3 2 0 4 0 3 3 0 0 6 9

(3)

82040330070

### Spark Theatre

The men and other women...  
The men and other women...  
The men and other women...

### NAACP Meeting

The Appalachian NAACP...  
The Appalachian NAACP...  
The Appalachian NAACP...

### Christmas Mart

The annual Christmas Mart...  
The annual Christmas Mart...  
The annual Christmas Mart...

### Reveries Taken Available

Due to limited supply of...  
Due to limited supply of...  
Due to limited supply of...



CLUB OLYMPIAN'S received a standing ovation at Friday's...  
CLUB OLYMPIAN'S received a standing ovation at Friday's...  
CLUB OLYMPIAN'S received a standing ovation at Friday's...

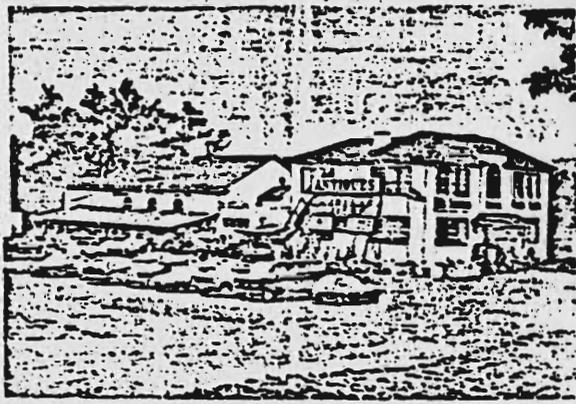
### CHRISTMAS PORTRAITS



Come in now...  
Before the holiday rush...  
Before the holiday rush...

ALAN'S PHOTOGRAPHY STUDIO  
107 E. Davis St. Canton

### Applebutter Boiling Saturday At That SPERRYVILLE EMPORIUM



An old-fashioned applebutter boiling will be held Saturday, October 18

### A QUART OF HOMEMADE APPLEBUTTER

will be given FREE to anyone holding a ticket for the Annual House Tour and Dried Flower Sale. Just show your ticket to a cashier at the Emporium and collect your free apple butter either day of the tour, Saturday or Sunday.

SUPPORT THE PRESIDENT  
HE WORKS FOR YOU  
High and Low  
Black and White  
Old and Young  
VOTE CARTER NOV. 4th  
By authority of Edward Bayliss, Treasurer, Rep'n Democratic Party



For the...  
For the...  
For the...

te

...  
...  
...

(LTC)

(Z)

*Taylor*

**SEDAM & HERGE**

A PROFESSIONAL CORPORATION  
ATTORNEYS AT LAW  
7800 OLD SPRINGHOUSE ROAD  
MCLEAN, VIRGINIA 22108

(703) 831-1000

*See*  
30 DEC 15 AID: 02

8574

1700 PENNSYLVANIA AVENUE, N.W.  
WASHINGTON, D.C. 20006  
(202) 383-7124

TWX/TELEX 710-831-0886

CABLE: SEDAMERGE

December 10, 1980

GLENN J. SEDAM, JR.  
J. CURTIS HERGE

ROBERT R. SPARKS, JR.  
MICHAEL D. HUGHES  
A. MARK CHRISTOPHER  
KAREN LUSSEN BLAIR  
JOHN ROBERT CLARK III  
J. STANLEY PAYNE, JR.

DEC 15 P12:28

GENERAL COUNSEL

RECEIVED

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

Dear Members of the Commission:

This letter constitutes an addendum to a complaint filed with the Commission on October 30, 1980, on behalf of our client, The Republican Party of Virginia, 115 East Grace Street, Richmond, Virginia 23219 against the Democratic County Committee of Rappahannock County, Virginia, the Democratic County Committee of Amelia County Virginia, and the Democratic County Committee of Clarke County Virginia.

The complaint of October 31, 1980 is hereby amended to include the following Committees:

1. The Democratic County Committee of Roanoke County, Virginia, Ms. Betty Ann Saunders, Chairman, 5134 Remington Road, S.W., Roanoke, Virginia 24014.
2. The Democratic County Committee of Greene County, Virginia, Ms. Constance Dudley, Chairman, Route 1, Box 221K, Stanardsville, Virginia 22973.
3. The Democratic County Committee of Orange County, Virginia, Mr. Watkins Ellerson, III, Chairman, Post Office Box 1080, Orange, Virginia 22960.
4. The Democratic County Committee of Gloucester County, Virginia, Mr. C. F. Hicks, Chairman, Gloucester, Virginia 23061.

8 2 0 4 0 3 3 0 0 7 1

*(Handwritten initials)*

5. The Democratic County Committee of Mathews County, Virginia, F. Paul Blanock, Chairman, Mathews, Virginia 23109.
6. The Democratic County Committee of Goochland County, Virginia, Mrs. Nancy Bowles, Chairman, Kents Store, Virginia 23084.
7. The Democratic County Committee of Lunenburg County, Virginia, Mr. James Edmunds, Chairman, Kenbridge, Virginia 23944.
8. The Democratic City Committee of Hopewell, Virginia, Ms. Hilda Traina, Chairman, 3408 Vinton Street, Hopewell, Virginia 23860.
9. The Democratic County Committee of Botetourt County, Virginia, Mr. Claude D. Carter, Chairman, Post Office Box 368, Daleville, Virginia 24083.
10. The Democratic County Committee of Henry County, Virginia, F. E. Marsh, Chairman, Main Street, Basset, Virginia 24055.
11. The Democratic City Committee of Martinsville, Virginia, Ms. Virginia Hall, Chairman, 1605 Mulberry Road, Martinsville, Virginia 24112.
12. The Democratic County Committee of Warren County, Virginia, Mr. Claude A. Stokes, Jr., Chairman, 1016 Virginia Avenue, Front Royal, Virginia 22630.
13. The Democratic City Committee of Galax, Virginia, Dr. Van B. McCarter, 212 West Center Street, Galax, Virginia 24333.
14. The Democratic County Committee of Grayson County, Virginia, Mr. Kenneth Broom, Route 1, Box 45, Fries, Virginia 24330.

82040330072

(H) P<sup>2</sup>

General Counsel  
Federal Election Commission  
Page Three  
December 10, 1980

Attached hereto as Exhibits A through N are copies of advertisements, advocating the election of Jimmy Carter, which appeared in the following newspapers. Each advertisement contains a disclaimer which states that one of the committees listed above paid for the advertisement:

- A. The Roanoke Times and World News of November 1, 1980;
- B. The Amelia Bulletin Monitor of October 30, 1980;
- C. The Green County Record of October 30, 1980;
- D. The Clarke County Courier of October 23, 1980;
- E. The Clarke County Courier of October 30, 1980;
- F. The Gloucester - Mathews Gazette Journal of October 30, 1980;
- G. The Goochland Gazette of October 30, 1980;
- H. The Kenbridge - Victoria Dispatch of October 30, 1980;
- I. The Fincastle Herald of October 30, 1980;
- J. The Progress Index of October 30, 1980;
- K. The Martinsville Bulletin of November 2, 1980;
- L. The Martinsville Bulletin of November 3, 1980;
- M. The Front Royal-Warren Sentinel of October 30, 1980;
- N. The Galax Gazette of October 31, 1980.

that:

2 U.S.C. §441(a)(d)(1) states in applicable part,

82040330073

(H) 3

"a national committee of a political party and a state committee of a political party, including any subordinate committee of a state committee may make expenditures in connection with the general election campaign of candidates for federal office..."

National party committees are limited by 2 U.S.C. §441 (a)(d)(2), 11 CFR 110.7(a)(1) and (2), to "expenditures which do not exceed an amount equal to 2 cents multiplied by the voting age population of the United States..."

11 CFR 110.7(a)(4) states that:

"The National Committee of a political party may make expenditures authorized by this section through any agent, including state and subordinate party committees."

In AO 1980-87, the Federal Election Commission determined that the provisions of the Federal Election Campaign Act, and the Regulations promulgated by the Commission which are cited above, restrict the activities of local party committees, so that expenditures for newspaper advertisements in support of presidential and vice presidential candidates can only be made if authorized and reported by the national committee.

The disclaimers which appear on the advertisements imply that the advertisements were not paid for by the various Democratic City and County Committees as agents of the Democratic National Committees. If the Democratic National Committee neither authorized nor reported the expenditures for the newspaper advertisements, the expenditures were made in violation of the Federal Election Campaign Laws.

11 CFR §110.11(a)(1) states that any disclaimer:

"...shall be presented in a clear and conspicuous manner to give the reader, observer or listener

(II) (4)

32040330074

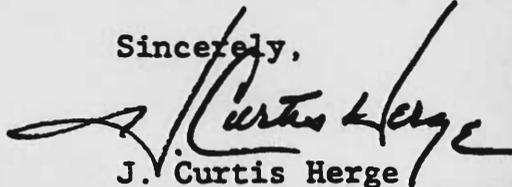
General Counsel  
Federal Election Commission  
Page Five  
December 10, 1980

adequate notice of the identity of persons who paid for or who authorized the communication..."

If the Democratic National Committee did authorize and report the expenditures for the attached advertisements, then the disclaimers which appeared on the advertisements did not comply with 11 CFR 110.11(a)(1) as said disclaimers do not give the reader adequate notice that the Democratic National Committee paid for and authorize the attached advertisements.

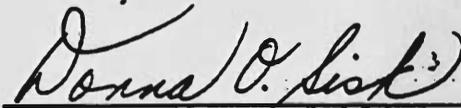
Your prompt attention to this addendum would be appreciated.

Sincerely,



J. Curtis Herge  
Counsel for the Republican  
Party of Virginia

Subscribed and sworn to me this 10<sup>th</sup> day of  
December, 1980.

  
Notary Public

My Commission Expires:

May 15, 1984

Attachments

(II) (5)

82040330075

8 2 0 4 0 3 3 0 0 7 6

### Before May Spark Theatre

The men and other groups involved in the production of "The Spark Theatre" are planning to start the production of "The Spark Theatre" in the near future. The group is currently in the process of raising funds and securing a location for the production. The production is expected to start in the month of May.

### NAACP Meeting

The NAACP is holding a meeting on Monday, October 26, at 7:30 p.m. at the First Baptist Church. The meeting is open to all members and is expected to be a very successful one.

### Christmas Mass

The annual Christmas Mass sponsored by the NAACP will be held on Monday, December 18, at 8:00 p.m. at the First Baptist Church. The Mass is open to all members and is expected to be a very beautiful one.

### Reverend Tickets Available

Reverend tickets are available for the production of "The Spark Theatre". The tickets are priced at \$2.00 and are available at the NAACP office. The production is expected to start in the month of May.



Three young girls in costumes, likely from a theatrical production. They are standing in a row, looking towards the camera. The girl in the center is wearing a dark dress with a white collar, while the girls on either side are wearing lighter-colored dresses. They appear to be in a stage setting with a dark background.

**CHRISTMAS PORTRAITS**

Come in now... Before the holiday rush for your Christmas portraits. Nothing is a more treasured gift than a picture.

For An Appointment Call 628-1822

**ALAN'S PHOTOGRAPHY STUDIO**  
107 E. State St. Cooper

*Applebutter Boiling Saturday At The*  
**SPERRYVILLE EMPORIUM**  
*Intersection Routes 211 and 322 in Sperryville*

An old-fashioned applebutter boiling will be held Saturday, October 18

**A QUART OF HOMEMADE APPLEBUTTER**

will be given FREE to anyone holding a ticket for the Annual House Tour and Dried Flower Sale.

Just show your ticket to a cashier at the Emporium and collect your free apple butter either day of the tour Saturday or Sunday.

**SUPPORT THE PRESIDENT**

**HE WORKS FOR YOU**

**High and Low**

**Black and White**

**Old and Young**

**VOTE CARTER NOV. 4th**

By authority of Edward Ruffey, Trustee, Republican Party

(11) (6)

03

82040330077

(Paid Political Adv.)

# VOTE FOR A SECURE FUTURE!

## ELECT

### DEMOCRATIC CANDIDATES:

- ★ Jimmy Carter for President
- ★ Walter Mondale for Vice-President
- ★ Donald S. Caldwell, for Commonwealth Atty.
- ★ Gary Minter, Hollins District Supervisor

**For Rides To The Polls**

# PHONE: 981-0273

in Salem 389-3787

by authority of Prentis Webb, Treasurer  
Roanoke City Democratic Committee

②

GAZ BY  
MAIL RATE  
NO POSTAGE  
PAID  
PERMIT NO. 6  
AMELIA, VA. 23002

# THE AMELIA BULLETIN MONITOR

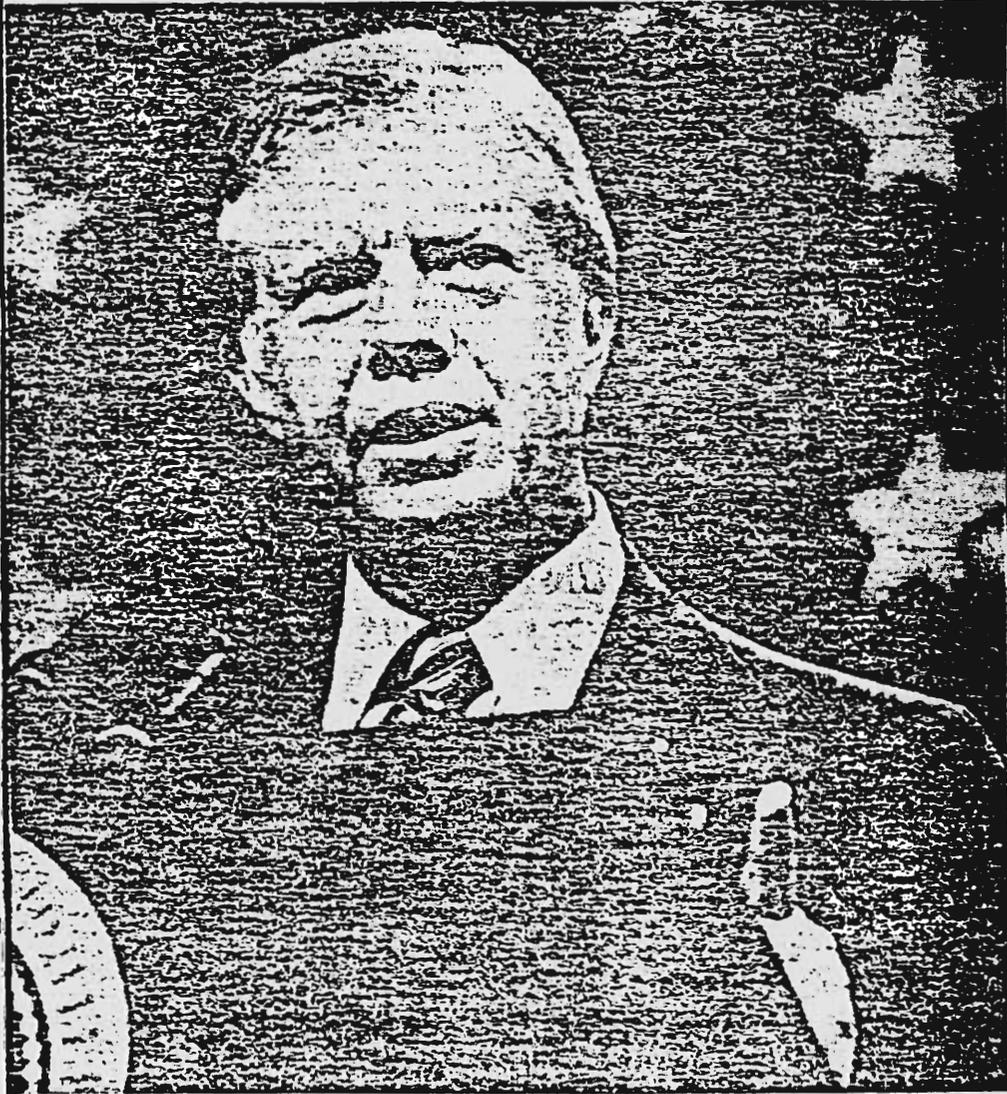
"Serving Every Household In Amelia County"

VOL. VIII, NO. 33

THURSDAY, OCTOBER 30, 1980

AMELIA COURT HOUSE, VIRGINIA 23002

## President Carter



**Election Day is  
Tuesday, November 4th**

Paid for by Amelia County Democratic Party  
Ruby F. Arrington, Treasurer

82040330078

(II) 8

# GREENE COUNTY *The* Record



and every Thursday morning

STANARDSVILLE, VIRGINIA 22973 THURSDAY, OCTOBER 30, 1980

15 cents a copy

VOLUME LXX NUMBER 44

## Carter / Mondale



# VOTE

Democratic on Tuesday

9 2 0 4 0 3 8 0 0 7 9

9  
(11)

# CLARKE <sup>THE</sup> COURIER



VOL. CXI. NO. 36

AWARDS WINNING NEWSPAPER BERRYVILLE, VA. OCTOBER 23, 1980

ONE SECTION 30 CENTS PER COPY

## VOTE DEMOCRATIC

### Jimmy Carter

### Nov. 4th

By authority of Lawrence W. White, Jr., Chairman, Clarke Co. Demo. Comm.

EXHIBIT D

(11) 10



CXII. NO. 37 AWARDS WINNING NEWSPAPER BERRYVILLE, VA. OCTOBER 30, 1980 ONE SECTION 30 CENTS PER COPY

# VOTE

# Jimmy Carter Walter Mondale DEMOCRATS

By authority of Lawrence W. White, Jr., Chairman, Clarke County Democratic Committee

82040330081

EXHIBIT E

(II) 11

(PAID ADVERTISEMENT)

**What is the unknown record of the Carter Administration?**

It can be summed up in one word: progress. The kind of progress that comes from hard, steady work. The kind of progress that doesn't always make headlines. The kind of progress that honors the Carter commitment to America and points us in the direction of the best future.

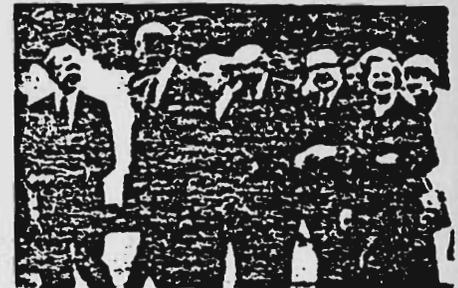
You may be surprised when you discover how much President Carter has accomplished—and in only 3-1/2 years! Take a look at just a few of his achievements:

- Created 8-1/2 million new jobs in the economy—a greater increase than in any comparable period in our history.
  - Had four of every five bills sent to Congress passed—a record every bit as impressive as Lyndon Johnson's and John Kennedy's.
  - Won enactment of America's first comprehensive energy plan—a plan that will make America less dependent on foreign oil and more secure in the future.
  - Passed the Windfall Profits Tax—a tax which takes unearned profits from the big oil companies and gives the money to those who cannot afford to heat their homes.
  - Hammered out the Middle East Peace Treaty between Israel and Egypt—a framework for peace in the future.
  - Appointed more women to his Cabinet than any other President in history.
  - Appointed more Blacks, Hispanics, and other minorities to judicial positions than all other presidents combined.
  - Saved the Social Security system from certain bankruptcy.
  - Reduced the Federal work force by over 20,000 employees—the first reduction in its size since the 1920s.
  - Deregulated the airline and trucking industries, saving consumers millions of dollars.
  - Increased federal support for education by 70%.
- With a record like this, President Carter and Vice President Mondale have earned their second term. Re-elect President Carter on November 4th. Keep him working for your future.

**Re-Elect  
President Carter  
and  
Vice President Mondale**



**A Tested and  
Trustworthy Team.  
Vote Democratic Nov. 4**



President Carter's strong leadership at the European Summit led to the establishment of a worldwide energy conservation policy and to the enactment of strong measures to counter the Soviet invasion of Afghanistan.



Each year in office, President Carter has increased expenditures for national defense.



President Carter speaks honestly and openly to the people of the United States at frequent town meetings.



Authorized by the Carter/Mondale Re-Election Committee, Inc.  
Robert S. Strauss, Chairman

**Gloucester County Democratic Committee**  
C.F. Hicks, Chairman  
**Mathews County Democratic Committee**  
F. Paul Blanock, Chairman

(This advertisement paid for by the Gloucester County Democratic Committee, the Mathews County Democratic Committee and the Democratic National Committee)

(II) 12

# A TESTED AND TRUSTWORTHY TEAM

**PRESIDENT**  
**Jimmy**  
**Carter**



**VICE**  
**PRESIDENT**  
**Walter**  
**Mondale**

*Take a minute to read the Real Carter record!*

- Created 8-1/2 million new jobs in the economy—a greater increase than in any comparable period in our history.
  - Had four of every five bills sent to Congress passed—a record every bit as impressive as Lyndon Johnson's and John Kennedy's.
  - Won enactment of America's first comprehensive energy plan—a plan that will make America less dependent on foreign oil and more secure in the future.
  - Passed the Windfall Profits Tax—a tax which takes unearned profits from the big oil companies and gives the money to those who cannot afford to heat their homes.
  - Hammered out the Middle East Peace Treaty between Israel and Egypt—a framework for peace in the future.
  - Appointed more women to his Cabinet than any other President in history.
  - Appointed more Blacks, Hispanics, and other minorities to judicial positions than all other presidents combined.
  - Saved the Social Security system from certain bankruptcy.
  - Reduced the Federal work force by over 20,000 employees—the first reduction in its size since the 1920's.
  - Deregulated the airline and trucking industries, saving consumers millions of dollars.
  - Increased federal support for education by 70%.
- With a record like this, President Carter and Vice President Mondale have earned their second term. Re-elect President Carter on November 4th. Keep him working for your future.

**On Tuesday, Nov. 4th, Vote Carter-Mondale**  
**For Goochland-For Virginia**  
**FOR AMERICA!**

Paid for by the Democratic Committee of Goochland County  
Nancy T. Bowles, Chairman

8 2 0 4 0 3 3 0 0 8 3

(14) (13)

(Paid Political Advertisement)

# Small Town America Can Depend On Jimmy Carter

# Jimmy Carter Is A Democrat Who Understands Farm Families And Rural Problems



### HE ADVOCATES:

1. Price support and acreage allotment for tobacco;
2. High base price supports for dairy farms;
3. Protection of beef cattle farmers from imports;
4. Development of export markets to maintain reasonable grain prices.

In Virginia, NET farm income increased 71% from \$220 million in 1976 to \$375 million in 1979.

Virginia's share of total US exports has increased dramatically from 1976 to 1979. Farmers Home Administration loans for business and industry in rural areas have increased 235% since 1977 and farm operating and ownership loans have increased 102%.

**A President  
From Rural America  
And  
For Rural America**

# VOTE CARTER NOVEMBER 4

THE BOTETOURT COUNTY NEWS  
and  
THE FINCASTLE HERALD

Botetourt's ALL COUNTY Newspaper--Established 1866--Our 114th Year Of Service

VOLUME 114 NUMBER 44 HOME NEWS EVERY WEEK FINCASTLE, VIRGINIA 24000 TWENTY CENTS PER COPY THURSDAY, OCTOBER 20, 1980

82040330085

The Democratic Committee  
Urges All Voters In Botetourt County



To  
Vote On Tuesday  
November 4th  
For  
Experience And  
Intelligence  
Re-Elect  
President Carter  
And  
V-Pres. Mondale

Paid for by the authority of Shirley Suckey, treasurer of the Botetourt County Democratic Committee.

EXHIBIT I

15

3 2 0 4 0 3 3 0 0 8 6



**The Weather**

Mostly clear and a little warmer tonight. With the warming trend, there is a chance of showers tomorrow. See details on page 2.

Classified Ads 732-3486

# The Progress-Index

Serving Petersburg, Colonial Heights, Hopewell, Va., And Surrounding Counties



**Day 366**

Free Our Hostages

Home Delivery 732-1153

Vol. 116—No. 122

Monday, November 3, 1980

(USPS 447-090)

One Section—14 Pages

Price 25 Cents

(Paid Political Advertisement)

## VOTE and RE-ELECT

### President Carter and Vice President Mondale.

A tested and trustworthy team.



#### A RECORD OF ACHIEVEMENT.

- Concern for senior citizens, health and quality of life
- More than 8 1/2 million new jobs
- Increased the nation's commitment to strong national defense
- Defender of human rights and a leader as a peacemaker
- Reorganization and better management of federal government
- Appointed more Blacks, Hispanics and other minorities to government positions, boards and commissions
- Reduced gasoline consumption by 12%, achieved passage of the Windfall Profits Tax

PHONE 458-6994 FOR TRANSPORTATION TO THE POLLS

Paid for and authorized by the Hopewell Democratic Committee, John Nozette, Treasurer.

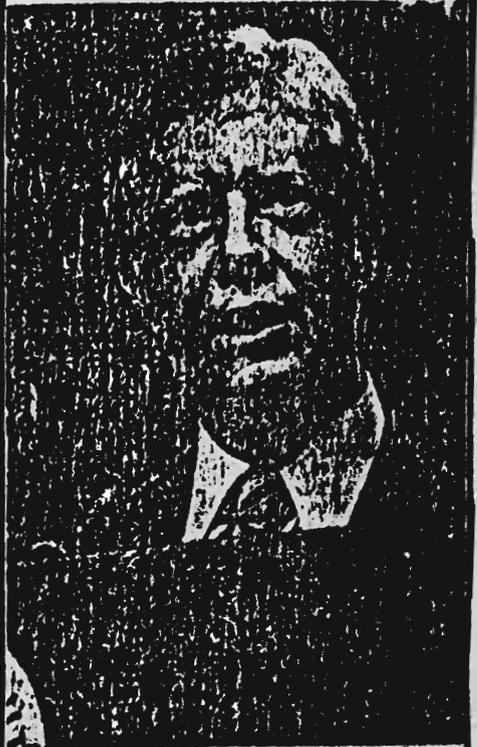
PT 5

3 2 0 4 0 3 3 0 0 8 7

# MARTINSVILLE BULLETIN

MARTINSVILLE, VIRGINIA  
SUNDAY, NOVEMBER 2, 1980  
VOLUME 91, NO. 263  
PRICE THIRTY-FIVE CENTS

**CARTER**  
★ for President ★



... In 1976 Jimmy Carter  
Carried Martinsville & Henry County  
.. do Your Part Toward A  
Better Tomorrow ...  
**Continue To Vote  
Democratic!!**  
Vote Carter, Mondale

DM

EXHIBIT K

3 2 0 4 0 3 3 0 0 3 3

# MARTINSVILLE BULLETIN

MARTINSVILLE, VIRGINIA  
FRIDAY, NOVEMBER 3, 1960  
VOLUME 91, NO. 264  
PRICE TWENTY CENTS

**X CARTER X**  
**★ for President ★**



... In 1976 Jimmy Carter  
Carried Martinsville & Henry County  
... do Your Part Toward A  
Better Tomorrow ...

**Continue To Vote  
Democratic!!**

EXHIBIT L

*(Handwritten mark)*

Since 1869

# Sentinel

..... 11  
 Apple Butter ..... 12  
 "Wild" Recipes ..... 13

111th YEAR NO. 39 • THURSDAY, OCTOBER 26, 1980 • 15 CENTS

FAD 20-200  
 VOTE

TUESDAY NOVEMBER 4, 1980

**DEMOCRATIC PARTY**  
**JIMMY CARTER, PRESIDENT**  
**WALTER F. MONDALE, VICE PRES.**

APPLICANTS FOR ABSENTEE BALLOTS MUST BE FILED  
 NO LATER THAN 5 P.M. SATURDAY, NOVEMBER 1 .

IF YOU NEED TRANSPORTATION TO THE POLLS ON  
 ELECTION DAY CALL CARTER-MONDALE HEADQUARTERS  
**636-1638**

BY AUTHORITY OF: FRANCES GONZALEZ, TREAS.  
 BARRETT COUNTY DEMOCRATIC COMMITTEE

Re-Elect  
**President Carter**  
 and  
**Vice President Mondale**



**A Tested and  
 Trustworthy Team.**  
**Vote Democratic Nov. 4**

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EXHIBIT M

119

Handwritten mark: a circle containing the number 5.

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**Blue Devils remain  
in championship chase**

Sports--Page 2A

**INSIDE TODAY**

Sports .....	2A, 3A	School News .....	1AA
Classified .....	4A, 5A	About People .....	2AA
Obituaries .....	7A	Ann Landers .....	2AA
What's Happening .....	8A	Horoscope .....	3AA
Movie Guide .....	8A	School menus .....	4AA

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WALTER, DOUGLAS S.  
P.O. Box 227  
Galax, VA. 24333

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FRIDAY

# The Gazette

"To Give the News Impartially Without Fear or Favor"

October 31, 1980

Serving the City of Galax, Carroll and Grayson Counties.

103rd Year - No. 130

12-30-80

**For Continued  
Peace and Progress**

**VOTE**

**CARTER/MONDALE**

**Tuesday, Nov. 4th.**



**Re-Elect President Carter  
and Vice President Mondale.  
The Democrats.  
For a better tomorrow.**

Paid For By Authority of Rullo Abdermon Treasurer  
Belen Democratic Committee & Ron Farmer, Treasurer  
Grayson Democratic Committee

**SEDAM & HERGE**

A PROFESSIONAL CORPORATION  
ATTORNEYS AT LAW  
7000 OLD SPRINGHOUSE ROAD  
MCLEAN, VIRGINIA 22102

(703) 821-1000

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GLENN J. SEDAM, JR.  
J. CURTIS HERGE

ROBERT R. SPARKS, JR.  
MICHAEL D. HUGHES  
A. MARK CHRISTOPHER  
KAREN LUSSEN BLAIR  
JOHN ROBERT CLARK III  
J. STANLEY PAYNE, JR.

1700 PENNSYLVANIA AVENUE, N.W.  
WASHINGTON, D.C. 20006  
(202) 393-7124  
TWX/TELEX 710-831-0890  
CABLE: SEDAMHERGE

December 22, 1980

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

Dear Members of the Commission:

This letter constitutes a complaint filed on behalf of our client, Republican Party of Virginia, 115 East Grace Street, Richmond, Virginia 23219, a political committee as defined under 2 U.S.C. §431(c), against the Democratic County Committee of Lee County, Virginia, Mr. Paul D. Harris, Chairman, Post Office Box 404, Jonesville, Virginia 24263.

Attached hereto as Exhibit A is a certified true transcription of a tape recording of a commercial advocating the election of Jimmy Carter which, upon information and belief, was aired by WSWV AM/FM Radio Station, 311 Woodway Road, Pennington Gap, Virginia 24277. Attached also as Exhibit B is, upon information and belief, a copy of the contract between WSWV Radio Station and the Democratic Committee of Lee County, Virginia, for the broadcasting of the commercial nine times between November 1, 1980 and November 4, 1980.

2 U.S.C. §441(a)(d)(1) states in applicable part, that:

"a national committee of a political party and a state committee of a political party, including any subordinate committee of a state committee may make expenditures in connection with the general election campaign of candidates for federal office..."

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General Counsel  
Federal Election Commission  
Page Two  
December 22, 1980

National party committees are limited by 2 U.S.C. §441(a)(d)(2), 11 CFR 110.7(a)(1) and (2), to "expenditures which do not exceed an amount equal to 2 cents multiplied by the voting age population of the United States..."

11 CFR 110.7(a)(4) states that:

"The National Committee of a political party may make expenditures authorized by this section through any agent, including state and subordinate party committees."

In AO 1980-87, the Federal Election Commission determined that the provisions of the Federal Election Campaign Act, and the Regulations promulgated by the Commission which are cited above, restrict the activities of local party committees, so that expenditures for radio advertisements in support of presidential and vice presidential candidates can only be made if authorized and reported by the national committee.

The advertisement disclaimer implies that the advertisement was not paid for by the Democratic County Committee of Lee County, Virginia, as an agent of the Democratic National Committee. If the Democratic National Committee neither authorized nor reported the expenditure for the radio advertisement, the expenditures were made in violation of the Federal Election Campaign Laws.

11 CFR §110.11 (a)(1) states that all disclaimers:

[S]hall appear or be presented in a clear and conspicuous manner to give the reader, observer or listener adequate notice of the identity of persons who paid for or who authorized the communication...

Even if the Democratic County Committee of Lee County, Virginia, acted as an agent for the Democratic National Committee when it contracted with WSWV Radio Station

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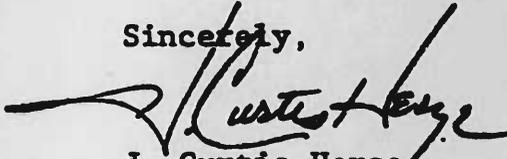
General Counsel  
Federal Election Commission  
Page Three  
December 22, 1980

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for the broadcasting of the advertisement, the disclaimer  
broadcasted with the advertisement violated 11 CFR §110.11(a)(1).

Your prompt attention to this complaint would be  
appreciated.

Sincerely,



J. Curtis Herge  
Counsel for the Republican  
Party of Virginia

Enclosures

Subscribed and sworn to before me this 22<sup>nd</sup> day of  
December, 1980.

Cynthia D. McLarty  
Notary Public

My commission expires: December 5, 1982



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The following, a paid political program.

Voters of Lee County, we appealed to you earlier this year in an effort to get you to vote to defeat the bond referendum proposed by the Republican Party. We stated the facts concerning what would happen if the referendum passed. The voters ignored our pleas, and passed the referendum. Now you, your children, and the County are the losers. The County is further in debt, the services have been cut, all of you have had an enormous tax increase. This has imposed a terrible burden on you, the taxpayers; and, has served one purpose, and one purpose only: to employ and raise the salaries of incompetent Republican employees. In last year's County election, the voters were so impressed by Republican false propaganda that they refused to listen to the truth from any Democrat concerning the affairs of Lee County. Now that the smoke has cleared, and you have been shocked into reality, we would like to relate to you the actual facts of what has happened in Lee County in recent years.

In the County election of 1971, the Republican party gained control of the County Board of Supervisors. During their 4-year term, they had their plans drawn for the construction of a new courthouse and appropriated the first money toward that project. Plans were continuing when they

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were defeated for reelection in 1975. After their defeat, they held numerous meetings to spend all the County money, so the Democrats would go into office with no money to operate on. As if that wasn't enough, they were successful in getting the \$1,000,000.00 in Federal funds, which Lee County was supposed to get for the courthouse, diverted to another county. After they had succeeded in bankrupting the County, they started an intense propaganda campaign, blaming the Democrats for building the courthouse, and putting the County into bankruptcy. They spread these falsehoods County-wide, every day for 4 years. Unfortunately, the people believed their falsehoods and swept them into office last year. They then led the voters into passing the bond referendum, by telling them if they didn't pass it, their taxes would be raised, schools would be closed, and numerous other falsehoods. This is only the first year of their term. Wait until you have endured 3 more years of it.

We now have another election at hand, Tuesday, November 4th. Jimmy Carter is a capable, honest, hardworking Christian man. He has worked hard to restore the respect and integrity of this nation after it was destroyed during the Nixon-Agnew Administration. He admits his mistakes, which are far outweighed by his accomplishments. He is not responsible for inflation, which is a world-wide problem. He will keep this country at peace.

Your other choice for President, Ronald Reagan, has the same qualifications for that position as your Lee County Board of Supervisors has for governing the County.

EE

Don't vote to put the Federal Government in the hands of an incompetent person, who might plunge us into war at any time. Don't make another mistake! Be sure to vote November 4th. Vote for yourself, your children, your County, and your nation. Vote to reelect Jimmy Carter, President.

The preceding paid for and authorized by the Lee County Democratic Committee, Brenda Brooks, Treasurer.

82040330096

*I certify that this is a true transcription:*

*December 22, 1980*

*Cynthia D. McPartly,  
Notary Public*

*My Commission Expires: December 5, 1982*



(711) 6

# AGREEMENT FORM FOR POLITICAL BROADCASTS

STATION and LOCATION WJLA-TV Washington, D.C. No. 10/31 1980

I, Jack Smith (being) Bobby Bare (on behalf of) Jimmy Carter  
The Lee County Democratic Party

a legally qualified candidate of the Democrat political party for the office of President  
of the U.S.

in the Presidential General election to be held on 11/4/80, do hereby request station time as follows:

LENGTH OF BROADCAST	HOUR	DAYS	TIMES PER WEEK	TOTAL NO. WEEKS	RATE
5-min.		3	9	1	\$6.50
30 Min (Bobby Bare)		1	1	1	\$20.00

DATE OF FIRST BROADCAST <u>11/1/80</u>	DATE OF LAST BROADCAST <u>11/4/80</u>	Total Charges: <u>\$20.00</u> <u>\$58.50</u> <u>\$78.50</u>
---	--	---

The broadcast time will be used by The Lee Co. Democratic Party  
I represent that the advance payment for the above-described broadcast time has been furnished by  
Lee County Democratic Party, Brenda Bracker,  
Treasurer.

and you are authorized to so describe that sponsor in your log and to announce the program as paid for by such person or entity. The entity furnishing the payment, if other than an individual person, is: ( ) a corporation; (X) a committee; ( ) an association; or ( ) other unincorporated group. The names and offices of the chief executive officers of the entity are: \_\_\_\_\_

It is my understanding that: If the time is to be used by the candidate himself within 45 days of a primary or primary runoff election, or within 60 days of a general or special election, the above charges represent the lowest unit charge of the station for the same class and amount of time for the same period; where the use is by a person or entity other than the candidate or is by the candidate but outside the aforementioned 45 or 60 day periods, the above charges do not exceed the charges made for comparable use of such station by other users.

It is agreed that use of the station for the above-stated purposes will be governed by the Communications Act of 1934, as amended, and the FCC's rules and regulations, particularly those provisions reprinted on the back hereof, which I have read and understand. I further agree to indemnify and hold harmless the station for any damages or liability that may ensue from the performance of the above-stated broadcasts. For the above-stated broadcasts I also agree to prepare a script or transcription, which will be delivered to the station at least \_\_\_\_\_ before the time of the scheduled broadcasts; (note: the two preceding sentences are not applicable if the candidate is personally using the time).

Date: 10/30/80 Jack Smith  
(Candidate, Supporter or Agent)

Accepted }  
Rejected } by Barbara Ashburn Title Office Mgr.  
Wayne Simpson (SA)

This application, whether accepted or rejected, will be available for public inspection for a period of two years in accordance with FCC regulations (AM, Section 73.120; FM, Section 73.290; TV, Section 73.657).

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# LAWS AND REGULATIONS GOVERNING POLITICAL BROADCASTS

From the Communications Act of 1934, as amended:

Section 312. (a) The Commission may revoke any station license or construction permit—

(7) for willful or repeated failure to allow reasonable access to or to permit purchase of reasonable amounts of time for the use of a broadcasting station by a legally qualified candidate for Federal elective office on behalf of his candidacy.

Section 315. (a) If any licensee shall permit any person who is a legally qualified candidate for any public office to use a broadcasting station, he shall afford equal opportunities to all other such candidates for that office in the use of such broadcasting station: *Provided*, That such licensee shall have no power of censorship over the material broadcast under the provisions of this section. No obligation is imposed under this subsection upon any licensee to allow the use of its station by any such candidate. Appearance by a legally qualified candidate on any—

- (1) bona fide newscast,
- (2) bona fide news interview,
- (3) bona fide news documentary (if the appearance of the candidate is incidental to the presentation of the subject or subjects covered by the news documentary), or
- (4) on-the-spot coverage of bona fide news events (including but not limited to political conventions and activities incidental thereto),

shall not be deemed to be use of a broadcasting station within the meaning of this subsection. Nothing in the foregoing sentence shall be construed as relieving broadcasters, in connection with the presentation of newscasts, news interviews, news documentaries, and on-the-spot coverage of news events, from the obligation imposed upon them under this Act to operate in the public interest and to afford reasonable opportunity for the discussion of conflicting views on issues of public importance.

(b) The charges made for the use of any broadcasting station by any person who is a legally qualified candidate for any public office in connection with his campaign for nomination for election, or election, in such office shall not exceed—

- (1) during the forty-five days preceding the date of a primary or primary runoff election and during the sixty days preceding the date of a general or special election in which such person is a candidate, the lowest unit charge of the station for the same class and amount of time for the same period; and
- (2) at any other time, the charges made for comparable use of such station by other users thereof.

(c) For the purposes of this section:

- (1) The term "broadcasting station" includes a community antenna television system.
- (2) The terms "licensee" and "station licensee" when used with respect to a community antenna television system, mean the operator of such system.

(d) The Commission shall prescribe appropriate rules and regulations to carry out the provisions of this section.

From the Rules of the Commission Governing Radio Broadcast Services. (The foregoing Sections of the Communications Act govern any inconsistencies between the following rules and those Sections):

Section 73.120. Broadcasts by candidates for public office

(a) Definitions. A "legally qualified candidate" means any person who has publicly announced that he is a candidate for nomination by a convention of a political party or for nomination or election in a primary, special, or general election, municipal, county, state or national, and who meets the qualifications prescribed by the applicable laws to hold the office for which he is a candidate, so that he may be

voted for by the electorate directly or by means of delegates or electors, and who:

- (1) has qualified for a place on the ballot or
- (2) is eligible under the applicable law to be voted for by sticker, by writing in his name on the ballot, or by other method, and
  - (i) has been duly nominated by a political party which is commonly known and regarded as such, or
  - (ii) makes a substantial showing that he is a bona fide candidate for nomination or office, as the case may be.

(b) General requirements. No station licensee is required to permit the use of its facilities by any legally qualified candidate for public office, but if any licensee shall permit any such candidate to use its facilities, it shall afford equal opportunities to all other such candidates for that office to use such facilities: *Provided*, That such licensee shall have no power of censorship over the material broadcast by any such candidate.

(c) Rates and practices. (1) The rates, if any, charged all such candidates for the same office shall be uniform and shall not be rebated by any means direct or indirect. A candidate shall, in each case, be charged no more than the rate the station would charge if the candidate were a commercial advertiser whose advertising was directed to promoting its business within the same area as that encompassed by the particular office for which such person is a candidate. All discount privileges otherwise offered by a station to commercial advertisers shall be available upon equal terms to all candidates for public office. (2) In making time available to candidates for public office no licensee shall make any discrimination between candidates in charges, practices, regulations, facilities, or services for or in connection with the service rendered pursuant to this part, or make or give any preference to any candidate for public office or subject any such candidate to any prejudice or disadvantage; nor shall any licensee make any contract or other agreement which shall have the effect of permitting any legally qualified candidate for any public office to broadcast to the exclusion of other legally qualified candidates for the same public office.

(d) Records; inspection. Every licensee shall keep and permit public inspection of a complete record of all requests for broadcast time made by or on behalf of candidates for public office, together with an appropriate notation showing the disposition made by the licensee of such requests, and the charges made, if any, if request is granted. Such records shall be retained for a period of two years.

(e) Time of request. A request for equal opportunities must be submitted to the licensee within 1 week of the day on which the first prior use, giving rise to the right to equal opportunities, occurred: *Provided, however*, That where a person was not a candidate at the time of such first prior use, he shall submit his request within 1 week of the first subsequent use after he has become a legally qualified candidate for the office in question.

(f) Burden of proof. A candidate requesting such equal opportunities of the licensee, or complaining of non-compliance to the Commission shall have the burden of proving that he and his opponent are legally qualified candidates for the same public office. (Corresponding rules—FM, 73.290; TV, 73.657)

Section 73.112 Program Log:

- (a) the following entries shall be made in the program log: • • •
  - (1) (v) An entry for each program presenting a political candidate, showing the name and political affiliation of such candidate • • •
  - (2) (iii) An entry showing that the appropriate announcement(s) (sponsorship, furnishing material or services, etc.) have been made as required by Section 317 of the Communications Act and § 73.119. A check mark will suffice but shall be made in such a way as to indicate the matter to which it relates. • • •
  - (4) (ii) An entry for each announcement presenting a political candidate, showing the name and political affiliation of such candidate.

(Corresponding Rules—FM, 73.252; TV, 73.670)

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1400 ROSS BUILDING  
RICHMOND, VIRGINIA 23219

December 8, 1980

Federal Election Commission  
Washington, D. C. 20463

Attention: William Taylor, Esquire

Re: MUR 1328 (80)

Dear Mr. Taylor:

This letter is written as a response to the Federal Election Commission's notification of November 3, 1980 to the Amelia County Democratic Committee, Clarke County Democratic Committee and Rappahannock County Democratic Committee. Based on the information set forth below, each of these Committees believe that no further action should be taken against them in connection with this matter.

During the month of October each of these three Committees placed newspaper advertising in newspapers in their localities urging support of the Carter/Mondale ticket. At the time that the advertisements were placed each of these Committees were authorized by the Democratic National Committee to expend for these advertisements on behalf of the Democratic National Committee. The Democratic National Committee has agreed that the amounts spent on these advertisements by the three local Committees are authorized and ratified by them and will be reported by the Democratic National Committee as expenditures permitted the DNC under 2 USC 441a (d). The Democratic National Committee is forwarding directly to the Federal Election Commission a statement confirming this authorization.

For your information the expenditures made were as follows: the Amelia County Democratic Committee, for advertising in the Amelia Bulletin Monitor the amount of \$229.86; the Clarke County Democratic Committee, for advertising in The Clarke Courier, the amount of \$180.00; the Rappahannock County Democratic Committee, for advertising in The Rappahannock News, the amount of \$94.60.

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GENERAL COUNSEL

Since the advertisements were placed by the local Committees, the Committees placed on the disclaimer that the ads were by the authority of the local party chairman or treasurer, rather than the Democratic National Committee. However, under the circumstances, we do not believe that the Commission should take further action in the matter. For this reason we request the Commission to take no further action in this matter.

Because of the present time I am sending this letter directly to you although it is not yet subscribed and sworn to by the individual county chairmen. However, copies have been sent to the individual chairmen and the copies executed by them will be forwarded directly to you shortly.

Respectfully submitted,

Lawrence H. Framme, III  
Counsel for the Amelia  
County Democratic Committee,  
the Clarke County Democratic  
Committee, the Rappahannock  
Democratic Committee

We, the undersigned, believe that the foregoing is true to the best of our knowledge and belief.

Juan Whittington, Chairman  
Amelia Democratic Committee

Given under my hand this \_\_\_\_\_ day of \_\_\_\_\_,

198\_\_.

My commission expires: \_\_\_\_\_

\_\_\_\_\_  
Notary Public

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*Lawrence White*

Lawrence White, Chairman  
Clarke County Democratic Committee

Given under my hand this 15<sup>th</sup> day of December,  
1980.

My commission expires: Nov 4, 1984

*James A. Warden*  
Notary Public

David Moore, Chairman  
Rappahannock Democratic Committee

Given under my hand this \_\_\_\_\_ day of \_\_\_\_\_,  
198\_\_.

My commission expires: \_\_\_\_\_

\_\_\_\_\_  
Notary Public

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1400 ROSS BUILDING  
RICHMOND, VIRGINIA 23219

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January 20, 1981

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

MUR 1328

Gentlemen:

This response to the above-named Complaint is filed on behalf of all local Democratic Committees named in the Addendum to Complaint filed by the Virginia Republican Party with the Commission on December 15, 1980. Documents authorizing me to represent the Green, Goochland, Lunenburg, Botetourt, Henry, Warren and Galax committees are enclosed. Similar documents from the Orange and Gloucester committees have already been sent directly to you. Documents from the Roanoke, Mathews, Hopewell, Martinsville and Grayson committees are being sent directly to you. All of these committees deny they have violated the Federal Election Campaign Act of 1971, but state that if a technical violation did occur, such was inadvertent and unintentional and in no way prejudiced any candidate.

Following a response containing points common to all committees complained of, individual committee responses will be set forth in the same order that they appear in the Complaint.

Matters Common To All Of The Committees Complained Of

Several points are common to all of the committees complained of by the Republican Party. With the exception of the advertisement placed by the Hopewell City Democratic Committee in the Petersburg Progress Index, all advertisements were placed in local, rural newspapers of very limited circulation. None of these newspapers were of daily circulation. While the Petersburg Progress Index has a daily circulation, its circulation is limited to the area of Petersburg, Virginia and the immediately surrounding counties. There was no

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GENERAL COUNSEL

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Federal Election Commission  
January 20, 1981  
Page Two

intent on the part of any committee to violate the Act. In those instances set forth below where committees made inquiries about their ability to advertise, they were unfortunately given incorrect information by persons in the Virginia Carter/Mondale Campaign.

Those committees who placed ads are seeking to cure any possible technical violation of the Act by requesting the Democratic Carter/Mondale Committee to authorize their expenditures under Section 441a (d) of the Federal Election Campaign Act. Certainly, the limited nature of the ads, their limited circulation and the outcome of the election in Virginia (Mr. Reagan carried Virginia by 237,435 votes), demonstrates that there was no prejudice to any candidate by the placement of the ads.

Individual Responses

1. Roanoke County Democratic Committee, Betty Ann Saunders, Chairman. The Roanoke County Democratic Committee did not place any newspaper advertisements in connection with the 1980 presidential election. The advertisement listed as Exhibit A in the Complaint bears a disclaimer stating that it was placed on the authority of the Roanoke City Democratic Committee. The Roanoke City Democratic Committee is a different entity than the Roanoke County Democratic Committee. The City of Roanoke is an independent city having its own Democratic committee. The Roanoke County Democratic Committee, therefore, denies that it violated the Federal Election Campaign Act of 1971.
2. Greene County Democratic Committee, Constance Dudley, Chairman. The newspaper advertisement attached to the Complaint as Exhibit C was placed by the Greene County Democratic Committee. Its cost of \$86.24 was paid by the Greene County Democratic Committee. The Greene County Committee, like many Virginia local committees, routinely place advertising advocating the election of Democratic candidates in a local newspaper shortly before elections.

The officers of the Greene County Democratic Committee who placed the advertisement were unaware of that portion of the Federal Election Campaign Act prohibiting local party committees from placing advertisements at their own expense which unambiguously refer to a presidential candidate. The Committee has requested

IV 5

Democratic National Committee under authority of Section 441a (d). The Democratic National Committee has not yet responded to this request, but the Committee expects it to act favorably on its request and to report this expenditure in its next report to the Commission. The Greene County Democratic Committee contends that with the reporting by the Democratic National Committee there will be no violation of the Federal Election Campaign Act and, therefore, asks the Commission to dismiss the Complaint against it.

- 3. Orange County Democratic Committee, H. Watkins Ellerson, III, Chairman. The Addendum to the Complaint filed by the Virginia Republican Party did not contain a copy of any advertisement placed by the Orange County Democratic Committee. The Orange County Democratic Committee did not authorize the placement of any newspaper advertising advocating the election of a presidential candidate in the 1980 election. The Orange County Democratic Committee is aware that an advertisement advocating the re-election of President Carter and Walter Mondale was placed by two individual members of the Committee and paid for with their own funds. To the best of the knowledge of the Orange County Democratic Committee that advertisement was placed by the Committee members as individuals and was not placed in consultation with, at the expense of or with the authorization of the Orange County Democratic Committee. Also, to the best of the Committee's knowledge, the advertisement was not placed at the direction of or in consultation with the Carter/Mondale Presidential Campaign.

Based on the facts set forth above, the Orange County Democratic Committee does not believe that it violated the Federal Election Campaign Act of 1971 and, therefore, asks the Commission to dismiss the Complaint against it.

- 4. Gloucester County Democratic Committee, C. F. Hicks, Chairman, and Mathews County Democratic Committee, F. Paul Blanock, Chairman. The advertisement attached as Exhibit F to the Addendum to the Complaint of the Virginia Republican Party was placed and paid for by the Gloucester County Democratic Committee and the

IV 6

Mathews County Democratic Committee. The cost of the advertisement was \$195.00. At the time the advertisement was placed and at this time the Gloucester and Mathews County Democratic Committees believe that they were authorized to place the advertisement as agents of the Democratic National Committee pursuant to the Democratic National Committee's authority to place such advertisements under Section 441a (d) of the Federal Election Campaign Act. Immediately before placing the advertisement, the Chairman of the Gloucester County Democratic Committee was advised that the Democratic National Committee had authorized the placement of the advertisement. At this time a request has been made to the Democratic National Committee to report the expenditure in its next report to the Federal Election Commission. While a formal response to this request has not yet been received from the Democratic National Committee, the Gloucester and Mathews Democratic Committees believe that a favorable response will be received. For this reason, the Gloucester and Mathews County Democratic Committees believe that they did not violate the Federal Election Campaign Act of 1971 and, therefore, ask the Commission to dismiss the complaint against them. It should be noted that the disclaimer on the advertisement does state that it was paid for by the Democratic National Committee in addition to other sources.

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5. Goochland County Democratic Committee, Nancy Bowles, Chairman. The advertisement attached as Exhibit G to the Addendum to the Complaint of the Virginia Republican Party was placed by the Goochland County Democratic Committee and paid for by that Committee. The cost of the advertisement was \$123.48. The circumstances surrounding the placement of the advertisement are similar to those of the advertisement placed by the Greene County Democratic Committee. The Goochland County Democratic Committee has customarily and routinely placed advertisements advocating the election of Democratic candidates in its local newspaper shortly before each election. At the time that the advertisement was placed, the officers of the Goochland County Democratic Committee were unaware of those portions of the Federal Election Campaign Act prohibiting local committees from placing advertisements

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unambiguously referring to presidential candidates at their own expense.

The Goochland County Democratic Committee has requested the Democratic National Committee to ratify its expenditure as an agent of the Democratic National Committee and to report the expenditure on the next report to the Federal Election Commission. The Goochland County Democratic Committee expects a favorable response to this request. Based on this, the Goochland County Democratic Committee believes that it did not violate the Federal Election Campaign Act of 1971 and, therefore, asks the Commission to dismiss the complaint against it.

- 40330106
6. Lunenburg County Democratic Committee, James Edmunds, Chairman. The Lunenburg County Democratic Committee did place the advertisement attached as Exhibit H to the Addendum to Complaint filed by the Republican Party of Virginia. Like the Greene and Goochland County Committees, the Lunenburg County Democratic Committee customarily places advertising advocating the election of Democratic candidates shortly before each election. At the time of placing the advertisement attached as Exhibit H, the Lunenburg County Democratic Committee was unaware of those portions of the Federal Election Campaign Act prohibiting local committees from placing such advertisements on their own account in presidential elections. The Lunenburg County Democratic Committee has requested the Democratic National Committee to ratify its expenditure for the advertisement in the amount of \$126.00 as an agency expenditure of the Democratic National Committee and that it be reported accordingly. On the basis of the above, the Lunenburg County Democratic Committee does not believe that it violated the Federal Election Campaign Act of 1971 and, therefore, requests the Commission to dismiss the Complaint against it.
7. City Democratic Committee of Hopewell, Virginia, Hilda Traina, Chairman. The City Democratic Committee of Hopewell did place the advertisement attached as Exhibit J to the Addendum to Complaint of the Virginia Republican Party. The circumstances surrounding its placement are similar to those of Greene, Goochland and Lunenburg County. The City Democratic Committee of Hopewell customarily and
- 148

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routinely places advertisements in its local newspaper advocating election of Democratic candidates before each election. The City Democratic Committee of Hopewell was unaware of the prohibitions of the Federal Election Campaign Act concerning payment for advertising unambiguously referring to presidential candidates on its own account. The City Democratic Committee of Hopewell has requested the Democratic National Committee to ratify its expenditure for the advertisement as an agency expenditure of the Democratic National Committee and that it report it accordingly. The City Democratic Committee of Hopewell anticipates a favorable response by the Democratic National Committee. Based on the above, the City Democratic Committee of Hopewell believes that it did not violate the Federal Election Campaign Act and, therefore, asks the Commission to dismiss the complaint against it.

8. Botetourt County Democratic Committee, Claude D. Carter, Chairman. The Botetourt County Democratic Committee did place the advertisement attached as Exhibit I to the Addendum to Complaint of the Republican Party of Virginia. The advertisement was paid for by that Committee at a cost of \$98.00.

Before running the advertisement, the Chairman of the Botetourt County Democratic Committee inquired of the Virginia State Carter/Mondale Headquarters whether such advertisement by local committees was permissible. The Chairman was advised by someone in the Virginia State Carter/Mondale Headquarters that such advertising was permissible as long as the total cost did not exceed \$1,000.00. At the time the Botetourt County Democratic Committee was unaware of the prohibitions of the Federal Election Campaign Act regarding placement of advertising unambiguously referring to presidential candidates on the account of the local committee. The Botetourt County Democratic Committee has requested the Democratic National Committee to ratify its expenditure as an agency expenditure of the Democratic National Committee and to report it to the Federal Election Commission accordingly. The Botetourt County Democratic Committee believes that the Democratic National Committee will act favorably on its request and for this reason does not believe that it violated the Federal Election Campaign Act. Accordingly, it requests the Commission to dismiss the Complaint against it.

14-12

82040330109

9. The City Democratic Committee of Martinsville, Virginia Hall, Chairman, and Henry County Democratic Committee, F. E. Marsh, Chairman. The Martinsville City Democratic Committee and Henry County Democratic Committee jointly placed the advertisements attached as Exhibits K and L to the Addendum to Complaint of the Republican Party of Virginia. Before placing the advertisements the Chairman of the Martinsville City Democratic Committee inquired of the Virginia State Carter/Mondale Headquarters as to whether such advertisement was permissible. The Chairman was advised by someone at the Headquarters that such advertising was permissible as long as the total cost of the advertising did not exceed \$1,000.00. Based on this advice, the Chairman placed the advertising. At that time neither the Martinsville City Democratic Committee or the Henry County Democratic Committee were aware of the provisions of the Federal Election Campaign Act relating to advertising by a local party committee. The Martinsville City Democratic Committee and the Henry County Democratic Committee have requested the Democratic National Committee to ratify its expenditure of \$100.00 as an agency expenditure of the Democratic National Committee. It expects a favorable response from the Democratic National Committee and that the Democratic National Committee will report the expenditure accordingly. For these reasons the Martinsville City Democratic Committee and the Henry County Democratic Committee believe that they did not violate the Federal Election Campaign Act and, therefore, ask the Commission to dismiss the complaint against them.

10. Warren County Democratic Committee, Claude A. Stokes, Chairman. The Warren County Democratic Committee did place the advertisement attached as Exhibit M to the Addendum to Complaint of the Republican Party of Virginia. Circumstances surrounding the placement of that advertisement are similar to those of Greene, Goochland, Lunenburg and others. The Warren County Democratic Committee routinely and customarily places advertisements advocating the election of Democratic candidates immediately before each election. At the time of the placing of this advertisement, at a cost of \$86.00, the Warren County Democratic Committee was unaware of the provisions of the Federal Election

IV (9)

Campaign Act of 1971 regarding the placement of such advertising by local committees. The Warren County Democratic Committee has now requested the Democratic National Committee to ratify its expenditure as an agency expenditure of the Democratic National Committee and to report it accordingly. It expects a favorable response by the Democratic National Committee. Therefore, the Warren County Democratic National Committee believes that it did not violate the Federal Election Campaign Act and, therefore, asks the Commission to dismiss the Complaint against it.

11. Galax City Democratic Committee, Dr. Van B. McCarter, Chairman, and Grayson County Democratic Committee, Kenneth Broom, Chairman. The Galax City and Grayson County Democratic Committees jointly placed the advertisement attached as Exhibit N to the Addendum to Complaint of the Republican Party of Virginia. The cost of the advertisement, \$125.00, was jointly paid by the two Committees. Before placing the advertisement, the Chairman of the Grayson County Democratic Committee inquired of the Ninth District coordinator for the Carter/Mondale Presidential Campaign as to whether or not a local committee was permitted to place such advertising. He was advised by the coordinator that such advertising was permissible provided the total amount of the advertising did not exceed \$1,000.00. At the time of placing the advertisement neither the Grayson County nor Galax City Democratic Committee were aware of the provisions of the Federal Election Campaign Act governing the placement of advertising by local committees on their own account. The Grayson County and Galax City Democratic Committees have requested the Democratic National Committee to ratify their expenditures as agency expenditures and to report them in its next report to the Federal Election Commission. The Committees expect a favorable response from the Democratic National Committee. For these reasons the Grayson County and Galax City Committees believe that they did not violate the Federal Election Campaign Act and, therefore, ask the Commission to dismiss the Complaint against them.

82040330109

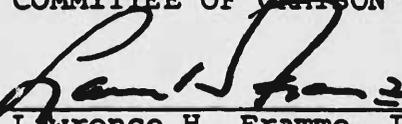
10

For the foregoing reasons, the Committees respectfully request the Commission to dismiss the complaints against them.

Because of the number of the Complaints included in the Addendum of the Republican Party and the fact that the committees involved are scattered throughout the state of Virginia, it is not possible to include a sworn statement of each of the committees involved in this response. However, this response does embody the facts recited to counsel by each of the committee chairmen. A copy of this response sworn to by each of the committee chairmen will be forwarded to the Commission directly from each chairman as soon as possible.

- THE DEMOCRATIC COUNTY COMMITTEE OF ROANOKE COUNTY
- THE DEMOCRATIC COUNTY COMMITTEE OF GREENE COUNTY
- THE DEMOCRATIC COUNTY COMMITTEE OF ORANGE COUNTY
- THE DEMOCRATIC COUNTY COMMITTEE OF GLOUCESTER COUNTY
- THE DEMOCRATIC COUNTY COMMITTEE OF MATHEWS COUNTY
- THE DEMOCRATIC COUNTY COMMITTEE OF GOOCHLAND COUNTY
- THE DEMOCRATIC COUNTY COMMITTEE OF LUNENBURG COUNTY
- THE DEMOCRATIC CITY COMMITTEE OF HOPEWELL, VIRGINIA
- THE DEMOCRATIC COUNTY COMMITTEE OF BOTETOURT COUNTY
- THE DEMOCRATIC COUNTY COMMITTEE OF HENRY COUNTY
- THE DEMOCRATIC CITY COMMITTEE OF MARTINSVILLE, VIRGINIA
- THE DEMOCRATIC COUNTY COMMITTEE OF WARREN COUNTY
- THE DEMOCRATIC CITY COMMITTEE OF GALAX, VIRGINIA
- THE DEMOCRATIC COUNTY COMMITTEE OF GRAYSON COUNTY

By:



Lawrence H. Framme, III  
Counsel

40330110



Taylor

31 FEB 5 49: 49

(2)

To: Federal Election Commission  
Washington, D. C.  
Attn: William Taylor, Esquire

Re: MUR-1328

Dear Mr. Taylor,

I have read the response filed in behalf of the Gloucester Democratic Committee and the facts stated therein are true to the best of my knowledge.

A. H. [Signature]  
Chairman

Gloucester Democratic  
Committee

State of Virginia

County of Gloucester, to-wit:

The foregoing instrument was acknowledged before me this 2nd day of February, 1981.

Betty Ann Burgess, Notary Public  
My comm. expired: March 27, 1982.

82040330111

31 FEB 9 12: 06

RECEIVED  
OFFICE OF THE  
GENERAL COUNSEL

(13)

31 JAN 23 4 9: 03

To: Federal Election Commission  
Washington, D. C.  
Attn: William Taylor, Esquire

Re: MUR-1328

Dear Mr. Taylor,

I have read the response filed in behalf of  
the WARREN COUNTY Democratic Committee and  
the facts stated therein are true to the best of  
my knowledge.

Claude A. Stokes, Jr.  
Chairman

WARREN COUNTY Democratic  
Committee

STATE OF VIRGINIA  
COUNTY OF WARREN, TO-WIT

I, Vernon T. MacTuck, A Notary Public in and  
for the State and County aforesaid, do hereby certify that  
Claude A. Stokes, Jr. whose name is signed above have this  
day personally appeared and acknowledged same before me in  
State and County aforesaid.

Given under my hand this 24th day of January, 1981  
My commission expires the 3rd day of February, 1981

Vernon T. MacTuck  
NOTARY PUBLIC

82040330112

IV (14)

31 JAN 23 10:03

*Taylor*

To: Federal Election Commission  
Washington, D. C.  
Attn: William Taylor, Esquire

Re: MUR-1328

Dear Mr. Taylor,

I have read the response filed in behalf of the GRAYSON/GALAX Democratic Committee and the facts stated therein are true to the best of my knowledge.

*Van B. McCarter*  
Chairman

Galax City Democratic  
Committee

82040330113

STATE OF VIRGINIA

To-wit:

COUNTY OF GRAYSON

I, Anna H. Hodges, A Notary Public in the State and County Aforesaid do hereby certify that Van B. McCarter personally appeared before me this 26th day of January, 1981 and acknowledged the foregoing.

My Commission expires 2/11/81.

*Anna H. Hodges*  
Anna H. Hodges  
Notary Public

31 JAN 28 10:26

IV (15)

RECEIVED  
FEB 11 1981

To: Federal Election Commission  
Washington, D. C.  
Attn: William Taylor, Esquire

Re: MUR-1328

Dear Mr. Taylor,

I have read the response filed in behalf of the Grayson County Democratic Committee and the facts stated therein are true to the best of my knowledge.

  
Chairman

Grayson County Democratic  
Committee

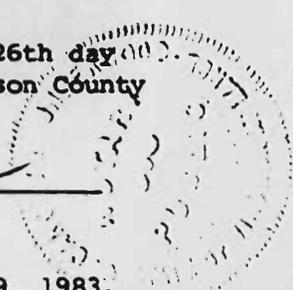
State of Virginia

County of Grayson, to wit:

The foregoing instrument was acknowledged before me this 26th day of January, 1981, by Kenneth R. Brooms, Chairman of Grayson County Democratic Committee.

  
Notary Public

My Commission expires January 9, 1983.



92040330114

IV (10)

01 JAN 26 4:48

To: Federal Election Commission  
Washington, D. C.  
Attn: William Taylor, Esquire

Re: MUR-1328

Dear Mr. Taylor,

I have read the response filed in behalf of  
the Mathews Democratic Committee and  
the facts stated therein are true to the best of  
my knowledge.

F. Paul Blanock  
Chairman

Mathews Democratic  
Committee

Subscribed and sworn to before me this 22nd  
day of January, 1981, by F. Paul Blanock.

Robert M. Hendrix  
Notary Public

My Commission expires: August 10, 1981

32040330115

IV 17

3805

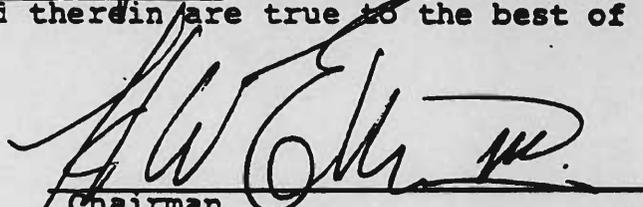
SI JAN 26 48:48

To: Federal Election Commission  
Washington, D. C.  
Attn: William Taylor, Esquire

Re: MUR-1328

Dear Mr. Taylor,

I have read the response filed in behalf of the Orange County Democratic Committee and the facts stated therein are true to the best of my knowledge.

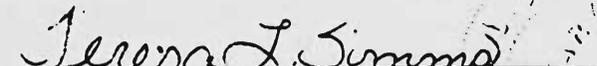
  
Chairman

Orange County Democratic  
Committee

STATE OF VIRGINIA  
County of Orange, to-wit:

Subscribed and sworn to before me, a Notary Public for the aforesaid jurisdiction, this 22nd day of January, 1981, by H. Watkins Ellerson, III, Chairman, Orange County Democratic Committee.

My Commission expires: March 30, 1983

  
Notary Public



82040330116

IV (18)

31 JAN 28 11:27

RECEIVED  
FEB 1 1981

GEC # 3831

31 JAN 28 P 1: 18

*(Handwritten mark)*

To: Federal Election Commission  
Washington, D. C.  
Attn: William Taylor, Esquire

Re: MUR-1328

Dear Mr. Taylor,

I have read the response filed in behalf of  
the Henry County Democratic Committee and  
the facts stated therein are true to the best of  
my knowledge.

F. E. March, Jr.  
Chairman

Henry County Democratic  
Committee

8 2 0 4 0 3 3 0 1 1 7

*(Handwritten mark: JV and 19 in a circle)*

39 : 2 P 21 JAN 28

TECH. DIVISION  
FEB 1 1958

01 JAN 26 21:16

To: Federal Election Commission  
Washington, D. C.  
Attn: William Taylor, Esquire  
Re: MUR-1328

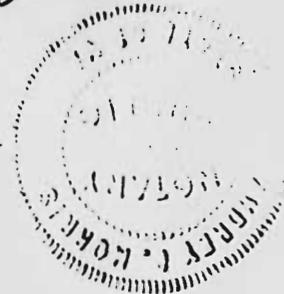
Dear Mr. Taylor,

I have read the response filed in behalf of  
the Greene County Democratic Committee and  
the facts stated therein are true to the best of  
my knowledge.

Constance J. Dudley  
Chairman

Greene County Democratic  
Committee

Audrey P. Morris  
1-22-81 Notary Public



68:22 02 11 15

77 77 77 77

82040330118

14 (20)

0067 3919

31 JAN 26 P 1: 18

To: Federal Election Commission  
Washington, D. C.  
Attn: William Taylor, Esquire

Re: MUR-1328

Dear Mr. Taylor,

I have read the response filed in behalf of the Moochland Democratic Committee and the facts stated therein are true to the best of my knowledge.

Nancy T. Bowles  
Chairman

Moochland Democratic Committee

STATE OF VIRGINIA,  
COUNTY OF FLUVANNA,

I hereby certify that the foregoing instrument was acknowledged before me this 23rd day of January, 1981, by Nancy T. Bowles.

Patricia M. Payne  
Notary Public

My Commission Expires: October 24, 1981.

82040330119

IV (2)

31 JAN 26 P 2: 39

7534 00 11/15/80  
05

3916  
21 FEB 83 11:44

40

To: Federal Election Commission  
Washington, D. C.  
Attn: William Taylor, Esquire

Re: MUR-1328

Dear Mr. Taylor,

I have read the response filed in behalf of the Martinville Democratic Committee and the facts stated therein are true to the best of my knowledge.

Virginia Hall  
Chairman

Martinville Democratic Exec  
Committee

2-3-83

Sworn to and subscribed before me this 3rd day of February, 1981

*Ann B. Winn*

Ann B. Winn, Notary Public  
My commission expires 9/26/83

11 (22)

21 FEB 83 11:56

RECEIVED  
GENERAL INVESTIGATIVE  
DIVISION

32040330120

To: Federal Election Commission  
Washington, D. C.  
Attn: William Taylor, Esquire

Re: MUR-1328

Dear Mr. Taylor,

I have read the response filed in behalf of  
the Polunke County Democratic Committee and  
the facts stated therein are true to the best of  
my knowledge.

Wm. C. Jones  
Chairman

Polunke County Democratic  
Committee

82040330121

14 (23)

2

To: Federal Election Commission  
Washington, D. C.  
Attn: William Taylor, Esquire

Re: MUR-1328

Dear Mr. Taylor,

I have read the response filed in behalf of  
the Hapewell Democratic Committee and  
the facts stated therein are true to the best of  
my knowledge.

Hilda Manieri Trama  
Chairman

Hapewell Democratic  
Committee

3408 Vinton Street  
Hapewell, Virginia 23860

82040330122

IV (24)

(20)

Lawrence White, Chairman  
Clarke County Democratic Committee

Given under my hand this \_\_\_\_\_ day of \_\_\_\_\_,  
198\_\_.

My commission expires: \_\_\_\_\_

Notary Public

*David M Moore*

David Moore, Chairman  
Rappahannock Democratic Committee

Given under my hand this 10 day of December,  
1980.

My commission expires: December 26, 1981

*Sheila J. Eatis*  
Notary Public



8 2 0 4 0 3 3 0 1 2 3

*IV* (25)

81 JAN 28 6 51 49

To: Federal Election Commission  
Washington, D. C.  
Attn: William Taylor, Esquire

Re: MUR-1328

Dear Mr. Taylor,

I have read the response filed in behalf of the Lunenburg County Democratic Committee and the facts stated therein are true to the best of my knowledge.

  
Chairman

Lunenburg County Democratic  
Committee

State of Virginia,

County of Lunenburg, to-wit:

The foregoing instrument was acknowledged before me this 22nd day of January, 1981, by James T. Edmunds.

My commission expires: Sept. 13, 1983.

  
Notary Public

82040330124



91 JAN 20 8 9: 48

To: Federal Election Commission  
Washington, D. C.  
Attn: William Taylor, Esquire

Re: MUR-1328

Dear Mr. Taylor,

Lawrence H. Framme, III is authorized to represent the Mathews Democratic Committee in connection with the above-named complaint.

F. P. [Signature]  
Chairman

Mathews Democratic  
Committee

8 2 0 4 0 3 3 0 1 2 5

IV (27)

cc 3920

01 JAN 26 P 1: 17

20

To: Federal Election Commission  
Washington, D. C.  
Attn: William Taylor, Esquire

Re: MUR-1328

Dear Mr. Taylor,

I have read the response filed in behalf of the Botetourt County Democratic Committee and the facts stated therein are true to the best of my knowledge. AS SHOWN ON AMENDED PAGE SIX Attached hereto.

Blenda D. Carter  
Chairman R+1 Box 407, Daleville, Va 24083

Botetourt County Democratic  
Committee

32040330126

IV (28)

1400 ROSS BUILDING  
RICHMOND, VIRGINIA 23219

March 10, 1981

912490

BCC = 450

MAR 12 AIO: 36

GENERAL COUNCIL

Federal Election Commission  
1325 K Strett, N.W.  
Washington, D.C. 20463

Attn: William Taylor, Esquire

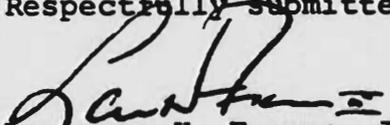
Re: MUR 1358 (80)

Dear Mr. Taylor:

This response is filed on behalf of the Lee County Democratic Committee in connection with the above-numbered complaint. Please reference our earlier response dated January 20, 1981 filed on behalf of several other Virginia Democratic committees.

The Lee County Democratic Committee authorized non-advertisements advocating the election of Jimmy Carter as President to be aired on WSWV Radio, Pennington Gap, Virginia. At the time the Lee County Democratic Committee believed they were authorized to do so on behalf of the Democratic National Committee. A agency agreement is being executed by the Democratic National Committee acknowledging the actions of the Lee County Committee and agreeing to report its expenditure in the amount of \$78.50 to the Federal Election Commission in its next report. Because of this, the Lee County Democratic Committee does not believe that it violated the Federal Election Campaign Act and, therefore, respectfully requests the Commission to dismiss the complaint against it.

Respectfully submitted,

  
Lawrence H. Framme, III

LHF, III/cfr



P. S. An acknowledgment and a representation authorization will be forwarded directly to you from the Lee County Democratic Committee Chairman.

82040330127

4571  
DEMOCRATIC  
NATIONAL COMMITTEE

1625 Massachusetts Ave., N.W. Washington, D.C. 20036

81 MAR 30 P 1: 46

March 26, 1981

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

We are submitting a clarification of an agreement dated March 10, 1981 between the Democratic National Committee and Mr. Larry Framme, the attorney for the respondents (sixteen local Virginia Democratic Committees).

The agreement was meant to be a ratification of the actions of the sixteen local Democratic Committees and the committees were acting as designated agents of the Democratic National Committee for purposes of making expenditures pursuant to 2 U.S.C. § 441a(d)(2) as specified in the agreement.

Sincerely,

*Pat Whiteaker*

Patricia Whiteaker  
Controller

8 2 0 4 0 3 3 0 1 2 8

(VI) ①

60 : 3 P 3 : 09

GENERAL INVESTIGATIVE

SECTION

4209  
**DEMOCRATIC  
NATIONAL COMMITTEE**

1625 Massachusetts Ave., N.W. Washington, D.C. 20036 (202) 797-5000

March 10, 1981

Mr. Lawrence H. Framme, III  
1400 Ross Building  
Richmond, VA 23219

Dear Mr. Framme:

This letter authorizes the Committees set forth as attached to make expenditures in the State of Virginia as duly authorized agents of the Democratic National Committee (DNC), for the purpose and subject to the conditions specified herein.

The Committees are authorized to make expenditures, limited and outlined as attached, for the purpose of influencing the election of Jimmy Carter and Walter Mondale on November 4, 1980, subject to the following terms and conditions:

1. The Committees agree to comply fully with the applicable provisions of the Federal Election Campaign Act of 1971, as amended (2 U.S.C. § et seq.) the "Act", and with any other applicable provision of State and Federal law.

2. The Committees shall supply the DNC with an itemized account of all expenditures made by the Committees pursuant to this agreement, as required under section 302(c) of the Act (2 U.S.C. § 432(c)). Each account shall provide the name and address of every person to whom any such expenditure was made, the date and amount thereof, and the purpose for which such expenditure was made, including a receipt, invoice, or cancelled check.

Any amount expended by the Committees pursuant to this agreement shall be deemed to have been expended by the DNC, shall be applied against the expenditure limit for the national committee of a political party specified in section 315(d)(2) of the Act (2 U.S.C. § 441a(d)(2)).

This agency agreement shall automatically and immediately terminate if the Committees fail to comply with any term or condition in this agreement, and shall otherwise be terminable by the DNC at will upon written notification thereof to the Treasurer or Chairperson of the Committee.

Attachment *D*

31 MAR 19 11:47

RECEIVED  
GENERAL COUNSEL

92040330129

As attorney for the Committees, please date and sign both copies of this letter; retain one copy; and return the other copy to the Democratic National Committee, 1625 Massachusetts Avenue, N.W., Washington, D.C. 20036, Attention: Patricia Whiteaker..

Sincerely,

*Charles E. Curry*  
Charles E. Curry  
Treasurer

I have read this agency agreement, and by my signature below, the Committees fully accept and agree to abide by the terms and conditions of this agreement.

Date: 3/16/81

Names of Committees:

- Democratic County of Grayson County
- Democratic City Committee of Galax
- Democratic County Committee of Lunenburg Couty
- Democratic County Committee of Goochland County
- Democratic City of Martinsville
- Democratic County Committee of Henry County
- Democratic County Committee of Greene County
- Democratic County Committee of Warren County
- Democratic County Committee of Botetpurt County
- Democratic County Committee of Mathews County
- Democratic County Committee of Gloucester County
- Democratic Committee of Clarke County
- Democratic Committee of Amelia County
- Democratic City Committee of Hopewille
- Democratic Committee of Rappahannock County
- Democratic County Committee of Lee County

82040330130

BY *L. D. ...*  
Name

*Attorney for the above*  
Title  
*named committees*

*attached (3)*

ATTACHMENT

<u>Name of Committee</u>	<u>Payee</u>	<u>Agreed Amount</u>
1) Democratic County Committee of Grayson County Route 1, Box 45 Fries, VA 24330 - and - Democratic City Committee of Galax 212 West Center Street Galax, VA 24333	The Gazette Galax, VA	\$125.00
2) Democratic County Committee of Lunenburg County Kenbridge, VA 23860	Kenbridge-Victoria Dispatch Kenbridge, VA	\$126.00
3) Democratic County Committee of Goochland County Kents Store, VA 23084	Goochland Gazette Goochland, VA	\$123.48
4) Democratic City Committee of Martinsville 1605 Mulberry Road Martinsville, VA 24112 -and -		
5) Democratic County Committee of Henry County Basset, VA 24055	Martinsville Bulletin Martinsville, VA	\$100.00
6) Democratic County Committee of Greene County Route 1, Box 221K Standardsville, VA 22973	Greene County Record Standardsville, VA 22973	\$ 86.24
7) Democratic County Committee of Warren County 1016 Virginia Avenue Front Royal, VA 22630	Warren Sentinel Front Royal, VA 22630	\$ 86.00
8) Democratic County Committee of Botetourt County P.O. Box 368 Daleville, VA 24083	Fincastle Herald Fincastle, VA	\$ 98.00
9) Democratic County Committee of Mathews County Mathews, VA 23109 - and - Democratic County Committee of Gloucester County Gloucester, VA 23-61	Gloucester Mathews Gazette Journal Gloucester, VA	\$195.00

Name of Committee

Payee

Agreed Amount

- |  |   |          |
|--|---|----------|
| 9) Democratic Committee of<br>Clarke County<br>Battleton Drive<br>Berryville, VA 22611   | Clark County Courier<br>Berryville, VA 22611                          | \$180.00 |
| 10) Democratic Committee of<br>Amelia County<br>Route 4, Box 136<br>Amelia, VA 23002     | Amelia Bulletin Monitor<br>Amelia Courthouse, VA 22302                | \$229.85 |
| 11) Democratic City Committee of<br>Hopewell<br>3408 Vinton Street<br>Hopewell, VA 23860 | Progress-Index<br>15 Franklin<br>Petersburg, VA                       | \$ 83.16 |
| 12) Democratic Committee of<br>Rappahannock County<br>Washington, VA 22747               | Fauquier Times<br>Democrat Co.<br>P.O. Box 631<br>Arlington, VA 22186 | \$ 94.60 |
| 13) Democratic County Committee of<br>Lee County<br>P.O. Box 404<br>Jonesville, VA 24263 | WSWO Radio<br>Pennington Gap, VA                                      | \$ 78.50 |

22

8204033013

V 5

Name of Committee

Payee

Accounted Amount

- 9) Democratic Committee of  
Clarke County  
Battleton Drive  
Berryville, VA 22611
- 10) Democratic Committee of  
Amelia County  
Route 4, Box 136  
Amelia, VA 23002
- 11) Democratic City Committee of  
Hopewell  
3408 Vinton Street  
Hopewell, VA 23860
- 12) Democratic Committee of  
Rappahannock County  
Washington, VA 22747
- 13) Democratic County Committee of  
Lee County  
P.O. Box 404  
Jonesville, VA 24263
- Clark County Courier  
Berryville, VA 22611
- Amelia Bulletin Monitor  
Amelia Courthouse, VA 22302
- Progress-Index  
15 Franklin  
Petersburg, VA
- Fauquier Times  
Democrat Co.  
P.O. Box 631  
Arlington, VA 22186
- WSWO Radio  
Pennington Gap, VA
- \$180.00
- \$229.85
- \$ 83.16
- \$ 94.60
- \$ 78.50

10

82040330133

16



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Mr. Watkins Elleson, III, Chairman  
The Democratic County Committee  
of Orange County, Virginia  
P.O. Box 1080  
Orange, Virginia 22960

RE: MUR 1328

Dear Mr. Elleson:

On January 5, 1981, the Commission notified you of a complaint, designated MUR 1358, alleging that your committee had violated certain sections of the Federal Election Campaign Act of 1971, as amended, or Chapters 95 and 96 of Title 26, U.S. Code. The Commission merged MUR 1358 with MUR 1328.

On April , 1982, the Commission found: 1) no reason to believe that your Committee had violated 2 U.S.C. § 441d; and, 2) reason to believe that it had violated 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. The file will be made part of the public record within thirty days. Should you wish to submit any materials to appear on the public record, please do so within ten days.

The Commission reminds you that making expenditures (not authorized by the National Committee of a political party pursuant to 2 U.S.C. § 441a(d)) by a local party committee in connection with the general election campaign for any candidate for President of the United States nevertheless appears to be a violation of 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) and you should take immediate steps to insure that this activity does not occur in the future.

Sincerely,

Charles N. Steele  
General Counsel

BY: Kenneth A. Gross  
Associate General Counsel

82040330134

TH



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Ms. Betty Ann Saunders, Chairman  
The Democratic County Committee  
of Roanoke County, Virginia  
5134 Remington Road, S.W.  
Roanoke, Virginia 24014

RE: MUR 1328

Dear Ms. Saunders:

On January 5, 1981, the Commission notified you of a complaint, designated MUR 1358, alleging that your committee had violated certain sections of the Federal Election Campaign Act of 1971, as amended, or Chapters 95 and 96 of Title 26, U.S. Code. The Commission merged MUR 1358 with MUR 1328.

On April , 1982, the Commission found: 1) no reason to believe that your Committee had violated 2 U.S.C. § 441d; and, 2) reason to believe that it had violated 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. The file will be made part of the public record within thirty days. Should you wish to submit any materials to appear on the public record, please do so within ten days.

The Commission reminds you that making expenditures (not authorized by the National Committee of a political party pursuant to 2 U.S.C. § 441a(d)) by a local party committee in connection with the general election campaign for any candidate for President of the United States nevertheless appears to be a violation of 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) and you should take immediate steps to insure that this activity does not occur in the future.

Sincerely,

Charles N. Steele  
General Counsel

BY: Kenneth A. Gross  
Associate General Counsel

82040330135

11-2



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Mr. Claude D. Carter, Chairman  
The Democratic County Committee  
of Botetourt County, Virginia  
P.O. Box 368  
Daleville, Virginia 24083

RE: MUR 1328

Dear Mr. Carter:

On January 5, 1981, the Commission notified you of a complaint, designated MUR 1358, alleging that your committee had violated certain sections of the Federal Election Campaign Act of 1971, as amended, or Chapters 95 and 96 of Title 26, U.S. Code. The Commission merged MUR 1358 with MUR 1328.

On April , 1982, the Commission found: 1) no reason to believe that your Committee had violated 2 U.S.C. § 441d; and, 2) reason to believe that it had violated 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. The file will be made part of the public record within thirty days. Should you wish to submit any materials to appear on the public record, please do so within ten days.

The Commission reminds you that making expenditures (not authorized by the National Committee of a political party pursuant to 2 U.S.C. § 441a(d)) by a local party committee in connection with the general election campaign for any candidate for President of the United States nevertheless appears to be a violation of 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) and you should take immediate steps to insure that this activity does not occur in the future.

Sincerely,

Charles N. Steele  
General Counsel

BY: Kenneth A. Gross  
Associate General Counsel

82040330136



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Ms. Heda Trana, Chairman  
The Democratic County Committee  
of Hopewell County, Virginia  
Hopewell, Virginia 23860

RE: MUR 1328

Dear Ms. Trana:

On January 5, 1981, the Commission notified you of a complaint, designated MUR 1358, alleging that your committee had violated certain sections of the Federal Election Campaign Act of 1971, as amended, or Chapters 95 and 96 of Title 26, U.S. Code. The Commission merged MUR 1358 with MUR 1328.

On April , 1982, the Commission found: 1) no reason to believe that your Committee had violated 2 U.S.C. § 441d; and, 2) reason to believe that it had violated 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. The file will be made part of the public record within thirty days. Should you wish to submit any materials to appear on the public record, please do so within ten days.

The Commission reminds you that making expenditures (not authorized by the National Committee of a political party pursuant to 2 U.S.C. § 441a(d)) by a local party committee in connection with the general election campaign for any candidate for President of the United States nevertheless appears to be a violation of 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) and you should take immediate steps to insure that this activity does not occur in the future.

Sincerely,

Charles N. Steele  
General Counsel

BY: Kenneth A. Gross  
Associate General Counsel

82040330137

W/1-4



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Mr. James Edmunds, Chairman  
The Democratic County Committee  
of Lunenburg County, Virginia  
Lunenburg County, Virginia

RE: MUR 1328

Dear Mr. Edmunds:

On January 5, 1981, the Commission notified you of a complaint, designated MUR 1358, alleging that your committee had violated certain sections of the Federal Election Campaign Act of 1971, as amended, or Chapters 95 and 96 of Title 26, U.S. Code. The Commission merged MUR 1358 with MUR 1328.

On April , 1982, the Commission found: 1) no reason to believe that your Committee had violated 2 U.S.C. § 441d; and, 2) reason to believe that it had violated 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. The file will be made part of the public record within thirty days. Should you wish to submit any materials to appear on the public record, please do so within ten days.

The Commission reminds you that making expenditures (not authorized by the National Committee of a political party pursuant to 2 U.S.C. § 441a(d)) by a local party committee in connection with the general election campaign for any candidate for President of the United States nevertheless appears to be a violation of 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) and you should take immediate steps to insure that this activity does not occur in the future.

Sincerely,

Charles N. Steele  
General Counsel

BY: Kenneth A. Gross  
Associate General Counsel

82040330138

VI-3



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Mrs. Dorothy Bowles, Chairman  
The Democratic County Committee  
of Goochland County, Virginia  
Kents Store, Virginia 23084

RE: MUR 1328

Dear Mrs. Bowles:

On January 5, 1981, the Commission notified you of a complaint, designated MUR 1358, alleging that your committee had violated certain sections of the Federal Election Campaign Act of 1971, as amended, or Chapters 95 and 96 of Title 26, U.S. Code. The Commission merged MUR 1358 with MUR 1328.

On April , 1982, the Commission found: 1) no reason to believe that your Committee had violated 2 U.S.C. § 441d; and, 2) reason to believe that it had violated 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. The file will be made part of the public record within thirty days. Should you wish to submit any materials to appear on the public record, please do so within ten days.

The Commission reminds you that making expenditures (not authorized by the National Committee of a political party pursuant to 2 U.S.C. § 441a(d)) by a local party committee in connection with the general election campaign for any candidate for President of the United States nevertheless appears to be a violation of 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) and you should take immediate steps to insure that this activity does not occur in the future.

Sincerely,

Charles N. Steele  
General Counsel

BY: Kenneth A. Gross  
Associate General Counsel

82040330139



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

F. Paul Blanock, Chairman  
The Democratic County Committee  
of Mathews County, Virginia  
Mathews, Virginia 23109

RE: MUR 1328

Dear Mr. Blanock:

On January 5, 1981, the Commission notified you of a complaint, designated MUR 1358, alleging that your committee had violated certain sections of the Federal Election Campaign Act of 1971, as amended, or Chapters 95 and 96 of Title 26, U.S. Code. The Commission merged MUR 1358 with MUR 1328.

On April , 1982, the Commission found: 1) no reason to believe that your Committee had violated 2 U.S.C. § 441d; and, 2) reason to believe that it had violated 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. The file will be made part of the public record within thirty days. Should you wish to submit any materials to appear on the public record, please do so within ten days.

The Commission reminds you that making expenditures (not authorized by the National Committee of a political party pursuant to 2 U.S.C. § 441a(d)) by a local party committee in connection with the general election campaign for any candidate for President of the United States nevertheless appears to be a violation of 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) and you should take immediate steps to insure that this activity does not occur in the future.

Sincerely,

Charles N. Steele  
General Counsel

BY: Kenneth A. Gross  
Associate General Counsel

82040330140

21



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Mr. C. F. Hicks, Chairman  
The Democratic County Committee  
of Gloucester County, Virginia  
Gloucester, Virginia 23061

RE: MUR 1328

Dear Mr. Hicks:

On January 5, 1981, the Commission notified you of a complaint, designated MUR 1358, alleging that your committee had violated certain sections of the Federal Election Campaign Act of 1971, as amended, or Chapters 95 and 96 of Title 26, U.S. Code. The Commission merged MUR 1358 with MUR 1328.

On April , 1982, the Commission found: 1) no reason to believe that your Committee had violated 2 U.S.C. § 441d; and, 2) reason to believe that it had violated 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. The file will be made part of the public record within thirty days. Should you wish to submit any materials to appear on the public record, please do so within ten days.

The Commission reminds you that making expenditures (not authorized by the National Committee of a political party pursuant to 2 U.S.C. § 441a(d)) by a local party committee in connection with the general election campaign for any candidate for President of the United States nevertheless appears to be a violation of 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) and you should take immediate steps to insure that this activity does not occur in the future.

Sincerely,

Charles N. Steele  
General Counsel

BY: Kenneth A. Gross  
Associate General Counsel

82040330141

1/8



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Ms. Constance Dudley, Chairman  
The Democratic County Committee  
of Greene County, Virginia  
Route 1, Box 221K  
Standardsville, Virginia 22973

RE: MUR 1328

Dear Ms. Dudley:

On January 5, 1981, the Commission notified you of a complaint, designated MUR 1358, alleging that your committee had violated certain sections of the Federal Election Campaign Act of 1971, as amended, or Chapters 95 and 96 of Title 26, U.S. Code. The Commission merged MUR 1358 with MUR 1328.

On April , 1982, the Commission found: 1) no reason to believe that your Committee had violated 2 U.S.C. § 441d; and, 2) reason to believe that it had violated 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. The file will be made part of the public record within thirty days. Should you wish to submit any materials to appear on the public record, please do so within ten days.

The Commission reminds you that making expenditures (not authorized by the National Committee of a political party pursuant to 2 U.S.C. § 441a(d)) by a local party committee in connection with the general election campaign for any candidate for President of the United States nevertheless appears to be a violation of 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) and you should take immediate steps to insure that this activity does not occur in the future.

Sincerely,

Charles N. Steele  
General Counsel

BY: Kenneth A. Gross  
Associate General Counsel

32040330142

11-9



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Mr. F. E. Marsh, Chairman  
The Democratic County Committee  
of Henry County, Virginia  
Main Street  
Basset, Virginia 24055

RE: MUR 1328

Dear Mr. Marsh:

On January 5, 1981, the Commission notified you of a complaint, designated MUR 1358, alleging that your committee had violated certain sections of the Federal Election Campaign Act of 1971, as amended, or Chapters 95 and 96 of Title 26, U.S. Code. The Commission merged MUR 1358 with MUR 1328.

On April , 1982, the Commission found: 1) no reason to believe that your Committee had violated 2 U.S.C. § 441d; and, 2) reason to believe that it had violated 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. The file will be made part of the public record within thirty days. Should you wish to submit any materials to appear on the public record, please do so within ten days.

The Commission reminds you that making expenditures (not authorized by the National Committee of a political party pursuant to 2 U.S.C. § 441a(d)) by a local party committee in connection with the general election campaign for any candidate for President of the United States nevertheless appears to be a violation of 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) and you should take immediate steps to insure that this activity does not occur in the future.

Sincerely,

Charles N. Steele  
General Counsel

BY: Kenneth A. Gross  
Associate General Counsel

32040330143



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Ms. Virginia Hall, Chairman  
The Democratic City Committee  
of Martinsville, Virginia  
1605 Mulberry Road  
Martinsville, Virginia 24112

RE: MUR 1328

Dear Ms. Hall:

On January 5, 1981, the Commission notified you of a complaint, designated MUR 1358, alleging that your committee had violated certain sections of the Federal Election Campaign Act of 1971, as amended, or Chapters 95 and 96 of Title 26, U.S. Code. The Commission merged MUR 1358 with MUR 1328.

On April , 1982, the Commission found: 1) no reason to believe that your Committee had violated 2 U.S.C. § 441d; and, 2) reason to believe that it had violated 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. The file will be made part of the public record within thirty days. Should you wish to submit any materials to appear on the public record, please do so within ten days.

The Commission reminds you that making expenditures (not authorized by the National Committee of a political party pursuant to 2 U.S.C. § 441a(d)) by a local party committee in connection with the general election campaign for any candidate for President of the United States nevertheless appears to be a violation of 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) and you should take immediate steps to insure that this activity does not occur in the future.

Sincerely,

Charles N. Steele  
General Counsel

BY: Kenneth A. Gross  
Associate General Counsel

82040330144

V. 11



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Mr. Claude A. Stokes, Jr., Chairman  
The Democratic County Committee  
of Warren County, Virginia  
1016 Virginia Avenue  
Front Royal, Virginia 22630

RE: MUR 1328

Dear Mr. Stokes:

On January 5, 1981, the Commission notified you of a complaint, designated MUR 1358, alleging that your committee had violated certain sections of the Federal Election Campaign Act of 1971, as amended, or Chapters 95 and 96 of Title 26, U.S. Code. The Commission merged MUR 1358 with MUR 1328.

On April , 1982, the Commission found: 1) no reason to believe that your Committee had violated 2 U.S.C. § 441d; and, 2) reason to believe that it had violated 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. The file will be made part of the public record within thirty days. Should you wish to submit any materials to appear on the public record, please do so within ten days.

The Commission reminds you that making expenditures (not authorized by the National Committee of a political party pursuant to 2 U.S.C. § 441a(d)) by a local party committee in connection with the general election campaign for any candidate for President of the United States nevertheless appears to be a violation of 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) and you should take immediate steps to insure that this activity does not occur in the future.

Sincerely,

Charles N. Steele  
General Counsel

BY: Kenneth A. Gross  
Associate General Counsel

82040330145

11-17



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Mr. Kenneth Broon, Chairman  
The Democratic County Committee  
of Grayson County, Virginia  
Route 1, Box 45  
Fnes, Virginia 24330

RE: MUR 1328

Dear Mr. Broon:

On January 5, 1981, the Commission notified you of a complaint, designated MUR 1358, alleging that your committee had violated certain sections of the Federal Election Campaign Act of 1971, as amended, or Chapters 95 and 96 of Title 26, U.S. Code. The Commission merged MUR 1358 with MUR 1328.

On April , 1982, the Commission found: 1) no reason to believe that your Committee had violated 2 U.S.C. § 441d; and, 2) reason to believe that it had violated 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. The file will be made part of the public record within thirty days. Should you wish to submit any materials to appear on the public record, please do so within ten days.

The Commission reminds you that making expenditures (not authorized by the National Committee of a political party pursuant to 2 U.S.C. § 441a(d)) by a local party committee in connection with the general election campaign for any candidate for President of the United States nevertheless appears to be a violation of 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) and you should take immediate steps to insure that this activity does not occur in the future.

Sincerely,

Charles N. Steele  
General Counsel

BY: Kenneth A. Gross  
Associate General Counsel

32040330146

J  
B



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Dr. Van B. McCarter, Chairman  
The Democratic City Committee  
of Galax, Virginia  
212 West Center Street  
Galax, Virginia 24333

RE: MUR 1328

Dear Dr. McCarter:

On January 5, 1981, the Commission notified you of a complaint, designated MUR 1358, alleging that your committee had violated certain sections of the Federal Election Campaign Act of 1971, as amended, or Chapters 95 and 96 of Title 26, U.S. Code. The Commission merged MUR 1358 with MUR 1328.

On April , 1982, the Commission found: 1) no reason to believe that your Committee had violated 2 U.S.C. § 441d; and, 2) reason to believe that it had violated 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. The file will be made part of the public record within thirty days. Should you wish to submit any materials to appear on the public record, please do so within ten days.

The Commission reminds you that making expenditures (not authorized by the National Committee of a political party pursuant to 2 U.S.C. § 441a(d)) by a local party committee in connection with the general election campaign for any candidate for President of the United States nevertheless appears to be a violation of 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) and you should take immediate steps to insure that this activity does not occur in the future.

Sincerely,

Charles N. Steele  
General Counsel

BY: Kenneth A. Gross  
Associate General Counsel

82040330147

V114



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

A. H. Keysen, Chairman  
The Democratic County Committee  
of Rappahannock County, Virginia  
Washington, Virginia 22747

RE: MUR 1328

Dear Mr. Keysen:

On January 5, 1981, the Commission notified you of a complaint, designated MUR 1358, alleging that your committee had violated certain sections of the Federal Election Campaign Act of 1971, as amended, or Chapters 95 and 96 of Title 26, U.S. Code. The Commission merged MUR 1358 with MUR 1328.

On April , 1982, the Commission found: 1) no reason to believe that your Committee had violated 2 U.S.C. § 441d; and, 2) reason to believe that it had violated 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. The file will be made part of the public record within thirty days. Should you wish to submit any materials to appear on the public record, please do so within ten days.

The Commission reminds you that making expenditures (not authorized by the National Committee of a political party pursuant to 2 U.S.C. § 441a(d)) by a local party committee in connection with the general election campaign for any candidate for President of the United States nevertheless appears to be a violation of 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) and you should take immediate steps to insure that this activity does not occur in the future.

Sincerely,

Charles N. Steele  
General Counsel

BY: Kenneth A. Gross  
Associate General Counsel

82040330148

VI-15



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Juan Whittington, Chairman  
The Democratic County Committee  
of Amelia County, Virginia  
Route 4, Box 136  
Amelia, Virginia 23002

RE: MUR 1328

Dear Mr. Whittington:

On January 5, 1981, the Commission notified you of a complaint, designated MUR 1358, alleging that your committee had violated certain sections of the Federal Election Campaign Act of 1971, as amended, or Chapters 95 and 96 of Title 26, U.S. Code. The Commission merged MUR 1358 with MUR 1328.

On April , 1982, the Commission found: 1) no reason to believe that your Committee had violated 2 U.S.C. § 441d; and, 2) reason to believe that it had violated 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. The file will be made part of the public record within thirty days. Should you wish to submit any materials to appear on the public record, please do so within ten days.

The Commission reminds you that making expenditures (not authorized by the National Committee of a political party pursuant to 2 U.S.C. § 441a(d)) by a local party committee in connection with the general election campaign for any candidate for President of the United States nevertheless appears to be a violation of 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) and you should take immediate steps to insure that this activity does not occur in the future.

Sincerely,

Charles N. Steele  
General Counsel

BY: Kenneth A. Gross  
Associate General Counsel

82040330149

✓ 16



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Lawrence White, Chairman  
The Democratic County Committee  
of Clarke County, Virginia  
Battleton Drive  
Berryville, Virginia 22611

RE: MUR 1328

Dear Mr. White:

On January 5, 1981, the Commission notified you of a complaint, designated MUR 1358, alleging that your committee had violated certain sections of the Federal Election Campaign Act of 1971, as amended, or Chapters 95 and 96 of Title 26, U.S. Code. The Commission merged MUR 1358 with MUR 1328.

On April , 1982, the Commission found: 1) no reason to believe that your Committee had violated 2 U.S.C. § 441d; and, 2) reason to believe that it had violated 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. The file will be made part of the public record within thirty days. Should you wish to submit any materials to appear on the public record, please do so within ten days.

The Commission reminds you that making expenditures (not authorized by the National Committee of a political party pursuant to 2 U.S.C. § 441a(d)) by a local party committee in connection with the general election campaign for any candidate for President of the United States nevertheless appears to be a violation of 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) and you should take immediate steps to insure that this activity does not occur in the future.

Sincerely,

Charles N. Steele  
General Counsel

BY: Kenneth A. Gross  
Associate General Counsel

82040330150

V-17



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Mr. Paul Harris, Chairman  
The Democratic County Committee  
of Lee County, Virginia  
P.O. Sob 404  
Jonesville, Virginia 24263

RE: MUR 1358

Dear Mr. Harris:

On January 5, 1981, the Commission notified you of a complaint, designated MUR 1358, alleging that your committee had violated certain sections of the Federal Election Campaign Act of 1971, as amended, or Chapters 95 and 96 of Title 26, U.S. Code. The Commission merged MUR 1358 with MUR 1328.

On April , 1982, the Commission found: 1) no reason to believe that your Committee had violated 2 U.S.C. § 441d; and, 2) reason to believe that it had violated 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. The file will be made part of the public record within thirty days. Should you wish to submit any materials to appear on the public record, please do so within ten days.

The Commission reminds you that making expenditures (not authorized by the National Committee of a political party pursuant to 2 U.S.C. § 441a(d)) by a local party committee in connection with the general election campaign for any candidate for President of the United States nevertheless appears to be a violation of 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) and you should take immediate steps to insure that this activity does not occur in the future.

Sincerely,

Charles N. Steele  
General Counsel

BY: Kenneth A. Gross  
Associate General Counsel

82040330151

VI 15



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Prentiss Webb, Treasurer  
Roanoke City Democratic Committee  
P.O. Box 20  
Roanoke, Virginia 24002

RE: MUR 1328

Dear Mr. Webb:

On April 9, 1981, the Commission notified you of a complaint alleging that your committee had violated certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission, on \_\_\_\_\_, 1982, determined that on the basis of the information in the complaint and information provided by your committee, there is no reason to believe that a violation of any statute within its jurisdiction has been committed. Accordingly, the Commission closed its file in this matter. This matter will become a part of the public record within thirty days.

Sincerely,

Charles N. Steele  
General Counsel

BY: Kenneth A. Gross  
Associate General Counsel

82040330152

*VI-19*



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

David A. Bowers, Esquire  
404 Shenandoah Building  
Roanoke, Virginia 24002

RE: MUR 1328

Dear Mr. Bowers:

On April 9, 1981, the Commission notified your client, the Roanoke City Democratic Committee, of a complaint alleging that your committee had violated certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission, on \_\_\_\_\_, 1982, determined that on the basis of the information in the complaint and information provided by you, there is no reason to believe that a violation of any statute within its jurisdiction has been committed. Accordingly, the Commission closed its file in this matter. This matter will become a part of the public record within thirty days. The Roanoke City Democratic Committee has also been notified of the Commission's finding.

Sincerely,

Charles N. Steele  
General Counsel

BY: Kenneth A. Gross  
Associate General Counsel

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*VI-20*



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Lawrence H. Framme, III, Esquire  
1400 Ross Building  
Richmond, Virginia 23219

RE: MUR 1328 and 1358

Dear Mr. Framme:

8 2 0 4 0 3 3 0 1 5 4

This letter is in regard to two complaints, designated MUR 1328 and MUR 1358, filed by the Republican Party of Virginia against your clients, the Democratic County Committee of Roanoke County, the Democratic County Committee of Orange County, the Democratic County Committee of Rappahannock County, the Democratic County Committee of Amelia County, the Democratic County Committee of Clarke County, the Democratic County Committee of Greene County, the Democratic County Committee of Gloucester County, the Democratic County Committee of Mathews County, the Democratic County Committee of Goochland County, the Democratic County Committee of Lunenburg County, the Democratic City Committee of Hopewell, the Democratic County Committee of Botetourt County, the Democratic County Committee of Henry County, the Democratic City Committee of Martinsville, the Democratic County Committee of Warren County, the Democratic City Committee of Galax, the Democratic County Committee of Grayson County, and the Democratic County Committee of Lee County. The complaints alleged that the committees had violated certain sections of the Federal Election Campaign Act of 1971, as amended. The Commission merged MUR 1358 with MUR 1328.

On April , 1982, the Commission found: 1) no reason to believe that these respondents had violated 2 U.S.C. § 441d; and, 2) reason to believe that they had violated 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. The file will be made part of the public record within thirty days. Should you wish to submit any materials to appear on the public record, please do so within ten days.

The Commission reminds you that making expenditures (not authorized by the National Committee of a political party pursuant to 2 U.S.C. § 441a(d)) by a local party committee in connection with the general election campaign for any candidate for President of the United States nevertheless appears to be a

*V. 21*

Letter to Lawrence H. Franke, III  
Page 2

violation of 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) and you should take immediate steps to insure that this activity does not occur in the future.

The respective committees have also been notified of the Commission's finding. If you have any questions, please contact Thomas J. Whiteheat at (202) 523-4000.

Sincerely,

Charles N. Steele  
General Counsel

BY: Kenneth A. Gross  
Associate General Counsel

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*W-20*



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

J. Curtis Herge, Esquire  
Sedam and Herge  
7600 Old Springhouse Road  
McLean, Virginia 22102

RE: MURs 1328 and 1358

Dear Mr. Herge:

The Federal Election Commission has reviewed the allegations of your complaints and determined that on the basis of the information provided in your complaints and information provided by the respondents, there is: 1) no reason to believe that a violation of 2 U.S.C. § 441d has been committed; and, 2) reason to believe that a violation of 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) has been committed. However, after considering the circumstances of this matter, the Commission has determined to take no further action with regard to the violation and close the file as it pertains to the respondent.

The Federal Election Campaign Act allows a complainant to seek judicial review of the Commission's action in this matter. See 2 U.S.C. § 437g(a)(8).

Should additional information come to your attention which you believe establishes a violation of the Act, you may file a complaint pursuant to the requirements set forth in 2 U.S.C. § 437g(a)(1) and 11 C.F.R. § 111.4.

Sincerely,

Charles N. Steele  
General Counsel

BY: Kenneth A. Gross  
Associate General Counsel

82040330156

*Handwritten initials*

REPORTS ANALYSIS REFERRAL UPDATE

\*ORIGIN: ~~OGC~~ COMPLAINT

DATE JUNE 30, 1981

ANALYST Alva Smith \*

TO: Office of General Counsel  
ATTENTION: Bill Taylor

TEAM CHIEF Bobby Warfel *BJ*

THROUGH: STAFF DIRECTOR *DL*

COMPLIANCE REVIEW Peggy Sims *PS*

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS *gp*

MUR No. 1328

DATE OF ORIGINAL REFERRAL ~~1980~~

\*\*PURPOSE: INFORMATION

The attached addendum was filed on May 7, 1981 with the DNC Services Corp's 12 Day Pre-Special Election Report for Maryland.

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OUTCOME: (if applicable)

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

DNC SERVICES CORPORATION/ DEMOCRATIC NATIONAL COMMITTEE

ADDENDUM TO THE REPORT

MAY 7, 1981

The DNC Services Corporation entered into certain agreements with various local Democratic Committees designating those committee's as its agent for the purpose of making expenditures pursuant to 2USA 441a(d) influencing the election of Jimmy Carter in the November 4, 1980 presidential campaign.

Attached is a listing of those designated committees and the expenditures made.

88 21 07 43 01 33 35 02 17 51 87

ATTACHMENT

<u>Name of Committee</u>	<u>Payee</u>	<u>Amount</u>
1) Democratic County Committee of Grayson County Route 1, Box 45 Fries, VA 24330 - and - Democratic City Committee of Galax 212 West Center Street Galax, VA 24333	The Gazette Galax, VA	\$125.00
2) Democratic County Committee of Lunenburg County Kenbridge, VA 23860	Kenbridge-Victoria Dispatch Kenbridge, VA	\$126.00
3) Democratic County Committee of Goochland County Kents Store, VA 23084	Goochland Gazette Goochland, VA	\$123.48
4) Democratic City Committee of Martinsville 1605 Mulberry Road Martinsville, VA 24112 -and - Democratic County Committee of Henry County Basset, VA 24055	Martinsville Bulletin Martinsville, VA	\$100.00
5) Democratic County Committee of Greene County Route 1, Box 221K Standardsville, VA 22973	Greene County Record Standardsville, VA 22973	\$ 86.24
6) Democratic County Committee of Warren County 1016 Virginia Avenue Front Royal, VA 22630	Warren Sentinel Front Royal, VA 22630	\$ 86.00
7) Democratic County Committee of Botetourt County P.O. Box 368 Daleville, VA 24083	Fincastle Herald Fincastle, VA	\$ 98.00
8) Democratic County Committee of Mathews County Mathews, VA 23109 - and - Democratic County Committee of Gloucester County Gloucester, VA 23-61	Gloucester Mathews Gazette Journal Gloucester, VA	\$195.00

Name of Committee

Payee

Amount

9)	Democratic Committee of Clarke County Battleton Drive Berryville, VA 22611	Clark County Courier Berryville, VA 22611	\$100.00
10)	Democratic Committee of Amelia County Route 4, Box 136 Amelia, VA 23002	Amelia Bulletin Monitor Amelia Courthouse, VA 22302	\$229.85
11)	Democratic City Committee of Hopewell 3408 Vinton Street Hopewell, VA 23860	Progress-Index 15 Franklin Petersburg, VA	\$ 83.16
12)	Democratic Committee of Rappahannock County Washington, VA 22747	Fauquier Times Democrat Co. P.O. Box 631 Arlington, VA 22186	\$ 94.60
13)	Democratic County Committee of Lee County P.O. Box 404 Jonesville, VA 24263	WSWO Radio Parrington Gap, VA	\$ 78.50

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BEFORE THE FEDERAL ELECTION COMMISSION

In the matter of	)	MUR 1328
	)	
In the Democratic County	)	and
Committee of Rappahannock	)	
County, Virginia et al.	)	MUR 1358

CERTIFICATION

I, Lena L. Stafford, Recording Secretary for the Federal Election Commission's Executive Session on April 30, 1981, do hereby certify that the Commission decided in a vote of 6-0 to return the above titled matter with regard to MURs 1328 and 1358 to the General Counsel for further consideration in conformance with Commission discussion.

Commissioners Aikens, Harris, McGarry, Reiche, Thomson, and Tiernan voted for this action.

Attest:

5-4-81

Date

Lena L. Stafford

Recording Secretary

82040330161



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE *MWE*  
FROM: MARJORIE W. EMMONS/JODY CUSTER *jc*  
OFFICE OF THE SECRETARY TO THE COMMISSION  
DATE: APRIL 23, 1981  
SUBJECT: ADDITIONAL OBJECTION - MURs 1328-1358  
General Counsel's Report, dated 2-25-81;  
Received in OCS, 4-21-81, 10:03

You were notified previously of an objection by  
Commissioners Reiche and Harris.

Commissioner Aikens submitted an additional objection  
at 3:40, April 23, 1981.

This matter will be discussed in executive session  
on Thursday, April 30, 1981.

32040330162



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE *MWE*  
FROM: MARJORIE W. EMMONS/JODY CUSTER *JC*  
OFFICE OF THE SECRETARY TO THE COMMISSION  
DATE: APRIL 22, 1981  
SUBJECT: ADDITIONAL OBJECTION - MURs 1328-1358  
General Counsel's Report, dated 2-25-81,  
signed 4-20-81; Received in OCS, 4-21-81,  
10:03

You were notified previously of an objection by  
Commissioner Reiche.

Commissioner Harris submitted an additional objection  
at 3:38, April 22, 1981.

This matter will be discussed in executive session  
on Tuesday, April 28, 1981.

82040330163



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS/JODY CUSTER *jc*

DATE: APRIL 22, 1981

SUBJECT: OBJECTION - MUR 1328 and 1358, General Counsel's  
Report, dated 2-25-81, signed 4-20-81; Received  
in OCS, 4-21-81, 10:03

The above-named document was circulated on a 48  
hour vote basis at 4:00, April 21, 1981.

Commissioner Reiche submitted an objection at 11:01,  
April 22, 1981.

This matter will be placed on the Executive Session  
Agenda for Tuesday, April 28, 1981.

32040330164

April 21, 1981

MEMORANDUM TO: Marjorie W. Emmons  
FROM: Elissa T. Garr  
SUBJECT: MURs 1328 and 1358

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

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In the Matter of )  
 )  
In the Democratic County )  
Committee of Rappahannock )  
County, Virginia et al. )

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MUR 1328  
and  
MUR 1358

**SENSITIVE**

GENERAL COUNSEL'S REPORT

I. Statement of Facts

By letters dated October 30, 1980 and December 10, 1980,  
The Republican Party of Virginia (complainant) filed a complaint  
(see attachments I, II), against the following Virginia Democratic  
committees:

- a) the Democratic County Committee of Rappahannock County;
- b) the Democratic County Committee of Amelia County;
- c) the Democratic County Committee of Clarke County;
- d) the Democratic County Committee of Roanoke County;
- e) the Democratic County Committee of Greene County;
- f) the Democratic County Committee of Orange County;
- g) the Democratic County Committee of Gloucester County;
- h) the Democratic County Committee of Mathews County;
- i) the Democratic County Committee of Goochland County;
- j) the Democratic County Committee of Lunenburg County;
- k) the Democratic City Committee of Hopewell;
- l) the Democratic County Committee of Botetourt County;
- m) the Democratic County Committee of Henry County;
- n) the Democratic City Committee of Martinsville;
- o) the Democratic County Committee of Warren County;

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- p) the Democratic City Committee of Galax,;
- q) the Democratic County Committee of Grayson County; Virginia, (collectively the respondents).

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In addition to the complaint and addendum mentioned above, the complainant filed an additional complaint by letter of December 27, 1980, against the Democratic County Committee of Lee County, Virginia (see attachment III). The facts and issues presented in this later complaint are similar to the facts and issues presented by the earlier complaint, except that the advertisements in question were radio advertisements rather than newspaper advertisements; the later complaint became MUR 1358. The complaint alleges that the respondents placed advertisements in their respective county newspapers or on the radio that expressly advocated the election to federal office of clearly identifiable candidates -- President Carter and Walter Mondale. Attached to the complaint are copies of many of the advertisements in question (see attachments I and II); it is the complainant's contention that the notices printed on or broadcast with these advertisements are in violation of 2 U.S.C. § 441d, because they fail to state who paid for the advertisements. Furthermore, this notice implies that the expenditures in question were neither authorized by nor reported by the Democratic National Committee (D.N.C.) and thus not valid party expenditures made pursuant to 2 U.S.C. § 441a(d).

The respondents replied, through counsel, to the allegations made by the complainant by letters of December 8, 1980 and January 20, 1981. (See attachment IV.) It is the respondent's contention that the advertisements in question were placed in news-

papers of limited circulation, and that the respondent had no intent to violate the Act. In addition to the general defense, the response sets forth facts that are pertinent to the various individual respondents.

## II. Factual and Legal Analysis

### Party Expenditure

Under 2 U.S.C. § 441a(d)(1), "...the national committee of a political party and a state committee of a political party, including any subordinate committee of a state committee, may make expenditures in connection with the general election campaign of a candidate for federal office...". If the expenditures are made, however, by a state committee or a subordinate committee of a state committee, the state committee or subordinate committee must be designated by the national committee as its agent (emphasis added). See 11 C.F.R. 110.7(a)(4) and AO 1980-87.

In the matter at hand, the respondents are all subordinate committees of the Democratic Party of Virginia, and most of them made expenditures in connection with the general election campaign of Jimmy Carter and Walter Mondale -- candidates for federal office. According to the respondents and according to the DNC (see attachment IV and V), the respondent made these expenditures as the designated agents of the DNC, pursuant to a ratification agreement entered into by the parties. While inartfully drafted, the letters of March 10, 1981 and March 26, 1981 (attachment V) taken together are meant to constitute a ratification of the prior acts of the respondent committees. It is the opinion of the Office of General Counsel that this

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ratification agreement is sufficient to satisfy the agency requirements of 11 C.F.R. 110.7(a)(4). Thus, the expenditures made by the respondent committees were made in accordance with the provisions of 2 U.S.C. § 441a(d)(1).

III. Notice Provision

2 U.S.C. § 441d(a)(3) states that:

Whenever any person makes an expenditure for the purpose of financing communications expressly advocating the election or defeat of a clearly identified candidate or solicits any contribution through any broadcasting station, newspaper, magazine, outdoor advertising facility, direct mailing or any other type of general public political advertising such communication - if not authorized by a candidate, an authorized political committee of a candidate, or its agents, shall clearly state the name of the person who paid for the communication and state that the communication is not authorized by any candidate or candidate's committee.

The advertisements used by the respondents expressly advocate the re-election of Jimmy Carter and Walter Mondale by using such words as "re-elect", "vote for", "elect", or "vote". All the advertisements contain a statement that clearly says that the advertisement was either paid for or authorized by the local committee; none of these advertisements contain, however, a statement that the advertisement was not authorized by the Carter/Mondale Committee as required by 2 U.S.C. § 441d(a)(3). Thus, the respondents are in violation of 2 U.S.C. § 441d(a)(3) for failing to state that these advertisements were authorized by the Carter/Mondale Committee. Nonetheless, it should be added that all of the advertisements in question clearly and conspicuously

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state that they were paid for or authorized by the local committee in question. It is apparent that there was no attempt to deceive the public for the reader or listener would certainly understand that these advertisements were sponsored by a Democratic committee that advocated the election of Jimmy Carter for President and Walter Mondale for Vice President. Furthermore, the amount of the individual expenditures involved is small, with none exceeding \$200. Therefore, it is the Office of General Counsel's recommendation that the Commission find reason to believe, the following respondents:

- a) the Democratic County Committee of Rappahannock County;
- b) the Democratic County Committee of Amelia County;
- c) the Democratic County Committee of Clarke County;
- d) the Democratic County Committee of Greene County;
- e) the Democratic County Committee of Gloucester County;
- f) the Democratic County Committee of Mathews County;
- g) the Democratic County Committee of Goochland County;
- h) the Democratic County Committee of Lunenburg County;
- i) the Democratic City Committee of Hopewell;
- j) the Democratic County Committee of Botetourt County;
- k) the Democratic County Committee of Henry County;
- l) the Democratic City Committee of Martinsville;

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- m) the Democratic County Committee of Warren County;
- n) the Democratic City Committee of Galax;
- o) the Democratic County Committee of Grayson County; and
- p) the Democratic County Committee of Lee County

violated 2 U.S.C. § 441d(a)(2), but take no further action.

In addition to setting forth facts that are common to all the respondents in their joint response (attachment IV), the individual respondents have also set forth facts that are pertinent to their particular situations. Of those individual responses, only those facts set forth by the Roanoke County Democratic Committee and the Orange County Democratic Committee are significant.

The respondent, the Roanoke County Democratic Committee, contends that it is a different organization from the Roanoke City Democratic Committee and points to exhibit "A" of the complaint. Exhibit "A" is a newspaper advertisement that the complainant alleges was sponsored by the Democratic County Committee of Roanoke; however, the notice that appears on this advertisement, which was arrowed by the complainant, states, "by authority of Prentis Webb, treasurer, Roanoke City Democratic Committee (emphasis added). Thus, the evidence upon which the complainant bases its allegation is without substance for the evidence the complainant points to, if anything, exonerates the respondent. Therefore, for this reason, the Office of General Counsel recommends that the Commission find no reason to believe that the Roanoke County Democratic Committee violated 2 U.S.C. § 441d(a)(2). 1/

1/ The Office of General Counsel has sent Roanoke City Democratic Committee notice that a complaint has been filed against it. Currently we are awaiting its response.

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The Orange County Democratic Committee (Orange County) contends that it neither placed an advertisement nor authorized the placement of any advertisement advocating the election of a presidential candidate in the 1980 election and points to the fact that the complainant has not brought forth any supporting documentary evidence. However, Orange County states that two individual members of the committee placed and paid for, as individuals, and without consulting with Orange County, an advertisement advocating the re-election of Jimmy Carter and Walter Mondale; such advertisement was not forwarded by the Committee.

Orange County is correct in stating that the complainant was unable to document its allegations that Orange County authorized, sponsored, or paid for an advertisement advocating the re-election of Jimmy Carter and Walter Mondale. The complainant's allegation is unsubstantiated by any supporting evidence and is specifically denied by Orange County, which in addition to denying the allegation, gives a credible explanation of who did sponsor an advertisement in Orange County advocating Jimmy Carter's re-election. Therefore, the Office of General Counsel recommends that the Commission find no reason to believe that the Orange County Democratic Committee violated 2 U.S.C. § 441d(a)(2).

RECOMMENDATIONS

1. Merge MUR 1358 with MUR 1328.
2. The Commission find reason to believe that the Democratic County Committee of Rappahannock County, the Democratic County Committee of Amelia County, the Democratic County Committee of Greene County, the Democratic County Committee

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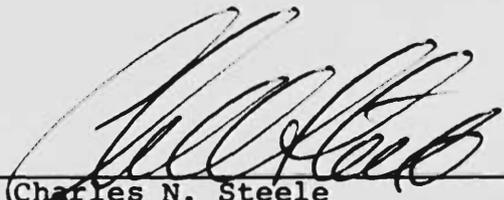
of Gloucester County, the Democratic County Committee of Mathews County, the Democratic County Committee of Goochland County, the Democratic County Committee of Lunenburg County, the Democratic City Committee of Hopewell, the Democratic County Committee of Botetourt County, the Democratic County Committee of Henry County, the Democratic City Committee of Martinsville, the Democratic County Committee of Warren County, the Democratic City Committee of Galax, the Democratic County Committee of Grayson County, the Democratic County Committee of Clarke County and the Democratic County Committee of Lee County violated 2 U.S.C. § 441d(a) (2), but take no further action.

3. Find no reason to believe that the Roanoke County Democratic Committee violated 2 U.S.C. § 441d(a) (2).
4. Find no reason to believe that the Orange County Democratic Committee violated 2 U.S.C. § 441d(a) (2).
5. Send attached letters.

Attachments

- I. Complaint
- II. Addendum to complaint
- III. Complaint against Lee County
- IV. Respondent's response to complaints
- V. Letter of DNC
- VI. Letter to respondents
- VII. Letter to complainant

20 April 1981  
Date

  
\_\_\_\_\_  
Charles N. Steele  
General Counsel

82040330173

GCC# 3190

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**SEDAM & HERGE**  
A PROFESSIONAL CORPORATION  
ATTORNEYS AT LAW  
7800 OLD SPRINGHOUSE ROAD  
MCLEAN, VIRGINIA 22101

GLENN J. SEDAM, JR.  
J. CURTIS HERGE

(703) 821-1000

1700 PENNSYLVANIA AVENUE, N.W.  
WASHINGTON, D.C. 20006  
(202) 393-7524

ROBERT R. SPARKS, JR.  
MICHAEL D. HUGHES  
A. MARK CHRISTOPHER  
KAREN LUSSEN BLAIR  
JOHN ROBERT CLARK III  
J. STANLEY PAYNE, JR.

October 30, 1980

TWX/TELEX 710-631-0896  
CABLE SEDAMHERGE

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

00C131 P2:05

GL...

Dear Member of the Commission:

This letter constitutes a complaint filed on behalf of our client, the Republican Party of Virginia, 110 East Grace Street, Richmond, Virginia 23219, a political committee as defined under 2 U.S.C. §431(c), against the Democratic County Committee of Rappahannock County, Virginia, Mr. A. H. Keyser, Chairman, Washington, Virginia 22747; Democratic County Committee of Amelia County, Virginia, Mr. Juan Whittington, Chairman, Route 4, Box 136, Amelia, Virginia 23002; and, the Democratic County Committee of Clarke County, Virginia, Mr. Lawrence White, Chairman, Battleton Drive, Berryville, Virginia 22611.

Attached hereto as Exhibit A is a copy of The Rappahannock News of Thursday, October 16, 1980. You will note that, on page 3, there is a two column advertisement advocating the election of Jimmy Carter as President. Please note that the advertisement bears a disclaimer, pursuant to 2 U.S.C. §441(d), which states that the advertisement was placed by authority of Edward Baily, Treasurer of the Rappahannock Democratic Party.

Upon information and belief, similar newspaper advertisements were published in local newspapers in Amelia and Clarke Counties, Virginia, by the respective Democratic County Committees in those localities.

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General Counsel  
Page Two  
October 30, 1980

2 U.S.C. §441(a)(d)(1) states in applicable part,  
that:

"a national committee of a political party and a state committee of a political party, including any subordinate committee of a state committee may make expenditures in connection with the general election campaign of candidates for federal office..."

National party committees are limited by 2 U.S.C. §441(a)(d)(2), 11 CFR 110.7(a)(1) and (2), to "expenditures which do not exceed an amount equal to 2 cents multiplied by the voting age population of the United States..."

11 CFR 110.7(a)(4) states that:

"The National Committee of a political party may make expenditures authorized by this section through any agent, including state and subordinate party committees."

In AO 1980-87, the Federal Election Commission determined that the provisions of the Federal Election Campaign Act, and the Regulations promulgated by the Commission, which are cited above, restrict the activities of local party committees, so that expenditures for newspaper advertisements in support of presidential and vice presidential candidates can only be made if authorized and reported by the national committee.

The advertisement disclaimer implies that the advertisement was not paid for by the Democratic County Committees of Amelia, Clarke, and Rappahannock Counties as agents of the Democratic National Committee. If the Democratic National Committee neither authorized nor reported the expenditures for the newspaper advertisement, the expenditures were made in violation of the Federal Election Campaign Laws.

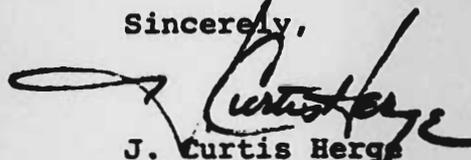
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(I)

General Counsel  
Page Two  
October 30, 1980

Your prompt attention to this complaint would be appreciated.

Sincerely,



J. Curtis Herges  
Counsel for the Republican  
Party of Virginia

Subscribed and sworn to  
before me this 30<sup>th</sup> day  
of October, 1980.

Wm. H. Rully  
Notary Public

My commission expires: 2/6/84

Attachment

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### Spark Theatre

The cast and other persons involved in the production of Gilbert and Sullivan's HMS Pinafore met recently to discuss the possibility of forming a local theatre group with special emphasis on an annual benefit performance for the Rappahannock County Library.

According to library board chairman Mary Jamison, the three night run of Pinafore on October 2, 3, and 4 cleared between \$1,200 and \$1,400 for the library.

A meeting has been set for Thursday, November 6, at 7:30 p.m. in the library. Anyone interested in joining the group or planning to make a contribution to the goals of local theatrical productions is invited to participate in this first organizational meeting.

NAACP

The Rappahannock NAACP Branch will meet Monday, October 20, at 7:30 p.m. at the First Baptist Church dining hall in Washington. Important business will be discussed and all members are urged to attend.

The annual Christmas Mart sponsored by the Manassas Art Guild is scheduled for November 16 and 17 at Lewi Auction and Antiques on Route 26 at Manassas. Hours are from 10 a.m. to 5 p.m. A splendid gathering of artists and craftsmen will display their unique talents for the viewing and shopping pleasure of all.

Christmas Mart

The annual Christmas Mart sponsored by the Manassas Art Guild is scheduled for November 16 and 17 at Lewi Auction and Antiques on Route 26 at Manassas. Hours are from 10 a.m. to 5 p.m. A splendid gathering of artists and craftsmen will display their unique talents for the viewing and shopping pleasure of all.

Revue Tickets Available

Due to limited seating at the Mountain Magic Theater, those wishing to attend the 1980 Rappahannock All-Star Revue on Saturday, November 1, should purchase their tickets this week at Nature's Foods or Serum Cards School in Washington, or at the Fire House Market in Warrenton. Tickets can also be reserved by calling the school at 675-3237, days.

For a full and successful evening of talent, tickets may not be available at the door.

The talent show is an annual event. Friends will benefit the Building Fund or Serum Cards School and Day Care Center, a non-profit corporation.

Appreciation Service

An appreciation service for Mr. Jackson who has served in the choir of Salem Baptist Church at Woodville for fifty years will be held Sunday, October 13, following the regular morning worship. The church expresses appreciation for his devoted service.



CUB OLYMPIANS received a standing ovation at Friday's awards ceremony for their performance in recent regional games. Marc Why (left) won a first place ribbon in the 50 yard dash for ten-year-olds and Jerry Elford (center) won another first place ribbon for six-year-olds in the nine year old group. Eric Robinson (right) brought home a first of ribbons and the prestigious gold medal for overall achievement among eight-year-olds. The Rappahannock youngsters competed against teams from nine counties at the games.

**CHRISTMAS PORTRAITS**

Come in now...  
Before the holiday rush  
for your GHI Portraits  
Nothing is a more treasured  
gift than a picture.

For An Appointment Call  
625-1880

**ALAN'S PHOTOGRAPHY STUDIO**  
167 E. Davis St.  
Culpeper



Frye Hill of

sources the her daughter to Kenneth on of Mr. and N. Smith of

is a 1980 Rappahannock School and is Dominion in Culpeper. 1978 graduate County High employed at City Highway is planned for

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**Applebutter Boiling Saturday At That SPERRYVILLE EMPORIUM**  
*Intersection Routes 211 and 522 in Sperryville*

An old-fashioned applebutter boiling will be held Saturday, October 18

**A QUART OF HOMEMADE APPLEBUTTER**  
will be given FREE to anyone holding a ticket for the Annual House Tour and Dried Flower Sale.

Just show your ticket to a cashier at the Emporium and collect your free apple butter either day of the tour, Saturday or Sunday.

**SUPPORT THE PRESIDENT**

**HE WORKS FOR YOU**

**High and Low**

**Black and White**

**Old and Young**

**VOTE CARTER NOV. 4th**

*By authority of Edward Batty Treas., Rapp'n Democratic Party*



Taylor

91150

cc

80 DEC 15 AID: 02  
\$ 574

**SEDAM & HERGE**  
A PROFESSIONAL CORPORATION  
ATTORNEYS AT LAW  
7800 OLD SPRINGHOUSE ROAD  
MCLEAN, VIRGINIA 22108

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1700 PENNSYLVANIA AVENUE, N.W.  
WASHINGTON, D.C. 20006  
(202) 388-7124

TWX/TELEX 710-831-0886  
CABLE: SEDHERGE

GLENN J. SEDAM, JR.  
J. CURTIS HERGE

ROBERT R. SPARKS, JR.  
MICHAEL D. HUGHES  
A. MARK CHRISTOPHER  
KAREN LUSSEN BLAIR  
JOHN ROBERT CLARK III  
J. STANLEY PAYNE, JR.

December 10, 1980

DEC 15 P12: 28

GENERAL COUNSEL

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

Dear Members of the Commission:

This letter constitutes an addendum to a complaint filed with the Commission on October 30, 1980, on behalf of our client, The Republican Party of Virginia, 115 East Grace Street, Richmond, Virginia 23219 against the Democratic County Committee of Rappahannock County, Virginia, the Democratic County Committee of Amelia County Virginia, and the Democratic County Committee of Clarke County Virginia.

The complaint of October 31, 1980 is hereby amended to include the following Committees:

1. The Democratic County Committee of Roanoke County, Virginia, Ms. Betty Ann Saunders, Chairman, 5134 Remington Road, S.W., Roanoke, Virginia 24014.
2. The Democratic County Committee of Greene County, Virginia, Ms. Constance Dudley, Chairman, Route 1, Box 221K, Stanardsville, Virginia 22973.
3. The Democratic County Committee of Orange County, Virginia, Mr. Watkins Ellerson, III, Chairman, Post Office Box 1080, Orange, Virginia 22960.
4. The Democratic County Committee of Gloucester County, Virginia, Mr. C. F. Hicks, Chairman, Gloucester, Virginia 23061.

82040330179

(11)

General Counsel  
Federal Election Commission  
Page Two  
December 10, 1980

5. The Democratic County Committee of Mathews County, Virginia, F. Paul Blanock, Chairman, Mathews, Virginia 23109.
6. The Democratic County Committee of Goochland County, Virginia, Mrs. Nancy Bowles, Chairman, Kents Store, Virginia 23084.
7. The Democratic County Committee of Lunenburg County, Virginia, Mr. James Edmunds, Chairman, Kenbridge, Virginia 23944.
8. The Democratic City Committee of Hopewell, Virginia, Ms. Hilda Traina, Chairman, 3408 Vinton Street, Hopewell, Virginia 23860.
9. The Democratic County Committee of Botetourt County, Virginia, Mr. Claude D. Carter, Chairman, Post Office Box 368, Daleville, Virginia 24083.
10. The Democratic County Committee of Henry County, Virginia, F. E. Marsh, Chairman, Main Street, Basset, Virginia 24055.
11. The Democratic City Committee of Martinsville, Virginia, Ms. Virginia Hall, Chairman, 1605 Mulberry Road, Martinsville, Virginia 24112.
12. The Democratic County Committee of Warren County, Virginia, Mr. Claude A. Stokes, Jr., Chairman, 1016 Virginia Avenue, Front Royal, Virginia 22630.
13. The Democratic City Committee of Galax, Virginia, Dr. Van B. McCarter, 212 West Center Street, Galax, Virginia 24333.
14. The Democratic County Committee of Grayson County, Virginia, Mr. Kenneth Broom, Route 1, Box 45, Fries, Virginia 24330.

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(H)

General Counsel  
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Page Three  
December 10, 1980

Attached hereto as Exhibits A through N are copies of advertisements, advocating the election of Jimmy Carter, which appeared in the following newspapers. Each advertisement contains a disclaimer which states that one of the committees listed above paid for the advertisement:

- A. The Roanoke Times and World News of November 1, 1980;
- B. The Amelia Bulletin Monitor of October 30, 1980;
- C. The Green County Record of October 30, 1980;
- D. The Clarke County Courier of October 23, 1980;
- E. The Clarke County Courier of October 30, 1980;
- F. The Gloucester - Mathews Gazette Journal of October 30, 1980;
- G. The Goochland Gazette of October 30, 1980;
- H. The Kenbridge - Victoria Dispatch of October 30, 1980;
- I. The Fincastle Herald of October 30, 1980;
- J. The Progress Index of October 30, 1980;
- K. The Martinsville Bulletin of November 2, 1980;
- L. The Martinsville Bulletin of November 3, 1980;
- M. The Front Royal-Warren Sentinel of October 30, 1980;
- N. The Galax Gazette of October 31, 1980.

that: 2 U.S.C. §441(a)(d)(1) states in applicable part,

82040330181

(H)

General Counsel  
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Page Four  
December 10, 1980

"a national committee of a political party and a state committee of a political party, including any subordinate committee of a state committee may make expenditures in connection with the general election campaign of candidates for federal office..."

National party committees are limited by 2 U.S.C. §441 (a)(d)(2), 11 CFR 110.7(a)(1) and (2), to "expenditures which do not exceed an amount equal to 2 cents multiplied by the voting age population of the United States..."

11 CFR 110.7(a)(4) states that:

"The National Committee of a political party may make expenditures authorized by this section through any agent, including state and subordinate party committees."

In AO 1980-87, the Federal Election Commission determined that the provisions of the Federal Election Campaign Act, and the Regulations promulgated by the Commission which are cited above, restrict the activities of local party committees, so that expenditures for newspaper advertisements in support of presidential and vice presidential candidates can only be made if authorized and reported by the national committee.

The disclaimers which appear on the advertisements imply that the advertisements were not paid for by the various Democratic City and County Committees as agents of the Democratic National Committees. If the Democratic National Committee neither authorized nor reported the expenditures for the newspaper advertisements, the expenditures were made in violation of the Federal Election Campaign Laws.

11 CFR §110.11(a)(1) states that any disclaimer:

"...shall be presented in a clear and conspicuous manner to give the reader, observer or listener

82040330182

(II)

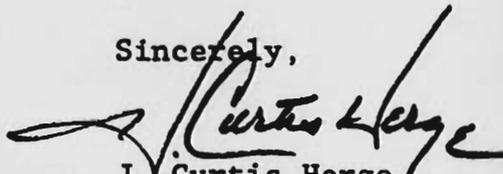
General Counsel  
Federal Election Commission  
Page Five  
December 10, 1980

adequate notice of the identity of persons who  
paid for or who authorized the communication..."

If the Democratic National Committee did authorize  
and report the expenditures for the attached advertisements,  
then the disclaimers which appeared on the advertisements  
did not comply with 11 CFR 110.11(a)(1) as said disclaimers  
do not give the reader adequate notice that the Democratic  
National Committee paid for and authorize the attached  
advertisements.

Your prompt attention to this addendum would be  
appreciated.

Sincerely,



J. Curtis Herge  
Counsel for the Republican  
Party of Virginia

Subscribed and sworn to me this 10<sup>th</sup> day of  
December, 1980.

  
Notary Public

My Commission Expires:

May 15, 1984

Attachments

(11)

82040330183



82040330185

(Paid Political Adv.)

**VOTE FOR A SECURE FUTURE!  
ELECT**

**DEMOCRATIC CANDIDATES:**

- ★ Jimmy Carter for President
- ★ Walter Mondale for Vice-President
- ★ Donald S. Caldwell, for Commonwealth Atty.
- ★ Gary Minter, Hollis District Supervisor

**For Rides To The Polls**

**PHONE: 981-0273**

**in Salem 389-3787**

by authority of Prentis Webb, Treasurer  
Renoir City Democratic Committee

(11)

NO POSTAGE  
NECESSARY  
IF MAILED  
IN THE  
UNITED STATES  
AMELIA, VA. 23002

# THE AMELIA BULLETIN MONITOR

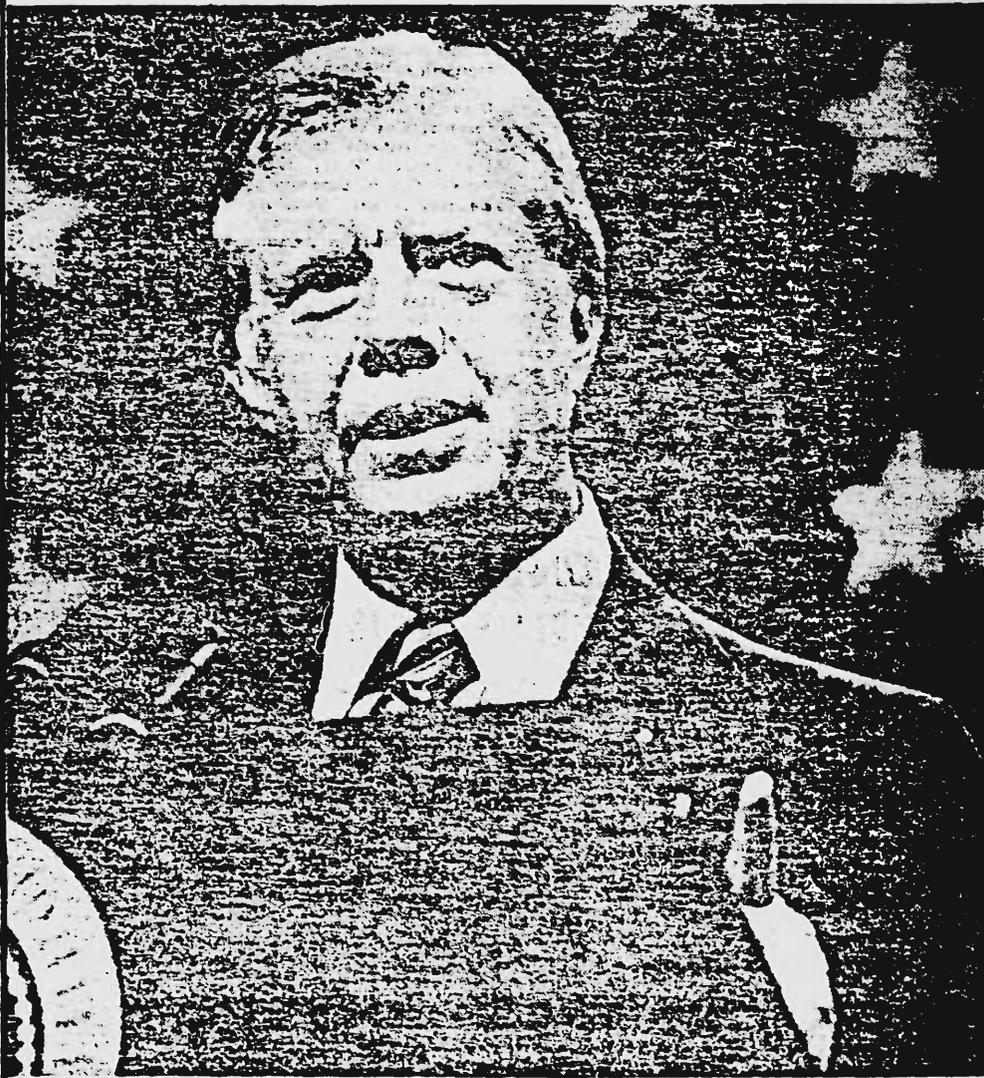
"Serving Every Household In Amelia County"

VOL. VIII, NO. 33

THURSDAY, OCTOBER 30, 1980

AMELIA COURT HOUSE, VIRGINIA 23002

## President Carter



**Election Day is  
Tuesday, November 4th**

Paid for by Amelia County Democratic Party  
Ruby F. Arrington, Treasurer

82040330186

II



# GREENE COUNTY *The* Record



Published every Thursday morning

STANARDSVILLE, VIRGINIA 22973 THURSDAY, OCTOBER 20, 1988

15 cents a copy

VOLUME LXX NUMBER 44

## Carter / Mondale



# VOTE

Democratic on Tuesday

8 2 0 4 0 3 3 0

(H)



VOL. CXI. NO. 36 AWARDS WINNING NEWSPAPER BERRYVILLE, VA. OCTOBER 23, 1980 ONE SECTION 30 CENTS PER COPY

# VOTE DEMOCRATIC

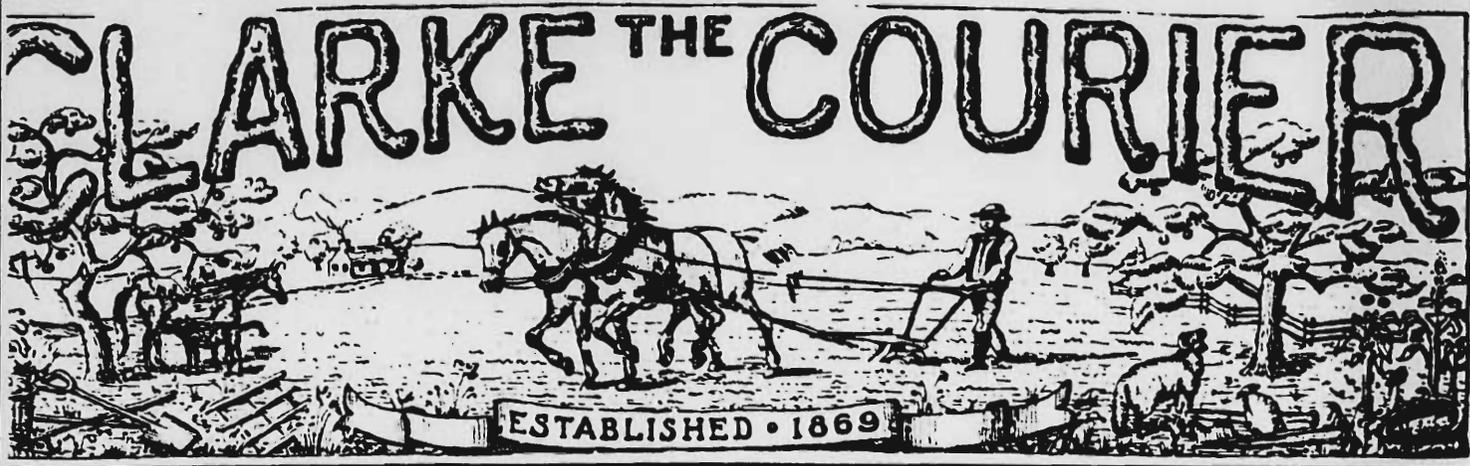
## Jimmy Carter

### Nov. 4th

By authority of Lawrence W. White, Jr., Chairman, Clarke Co. Demo. Comm.

EXHIBIT D

(72)



CXI. NO. 37 AWARDS WINNING NEWSPAPER BERRYVILLE, VA. OCTOBER 30, 1980 ONE SECTION 30 CENTS PER COPY

**VOTE**

**Jimmy Carter**  
**Walter Mondale**  
**DEMOCRATS**

By authority of Lawrence W. White, Jr., Chairman, Clarke County Democratic Committee

3 2 0 4 0 3 3 0 1 8 9

EXHIBIT E

(H)

(PAID ADVERTISEMENT)

**What is the unknown record of the Carter Administration?**

It can be summed up in one word: progress. The kind of progress that comes from hard, steady work. The kind of progress that doesn't always make headlines. The kind of progress that honors the Carter commitment to America and points us in the direction of the best future.

You may be surprised when you discover how much President Carter has accomplished—and in only 3-1/2 years! Take a look at just a few of his achievements:

- Created 8-1/2 million new jobs in the economy—a greater increase than in any comparable period in our history.
- Had four of every five bills sent to Congress passed—a record every bit as impressive as Lyndon Johnson's and John Kennedy's.
- Won enactment of America's first comprehensive energy plan—a plan that will make America less dependent on foreign oil and more secure in the future.
- Passed the Windfall Profits Tax—a tax which takes unearned profits from the big oil companies and gives the money to those who cannot afford to heat their homes.
- Hammered out the Middle East Peace Treaty between Israel and Egypt—a framework for peace in the future.
- Appointed more women to his Cabinet than any other President in history.
- Appointed more Blacks, Hispanics, and other minorities to judicial positions than all other presidents combined.
- Saved the Social Security system from certain bankruptcy.
- Reduced the Federal work force by over 20,000 employees—the first reduction in its size since the 1920s.
- Deregulated the airline and trucking industries, saving consumers millions of dollars.
- Increased federal support for education by 70%.

With a record like this, President Carter and Vice President Mondale have earned their second term. Re-elect President Carter on November 4th. Keep him working for your future.

**Re-Elect  
President Carter  
and  
Vice President Mondale**



**A Tested and  
Trustworthy Team.  
Vote Democratic Nov. 4**



President Carter's strong leadership at the European Summit led to the establishment of a worldwide energy conservation policy and to the enactment of strong measures to counter the Soviet invasion of Afghanistan.



Each year in office, President Carter has increased expenditures for national defense.



President Carter speaks honestly and openly to the people of the United States at frequent town meetings.



Authorized by the Carter/Mondale Re-Election Committee, Inc.  
Robert S. Strauss, Chairman

**Gloucester County Democratic Committee**

C.F. Hicks, Chairman

**Mathews County Democratic Committee**

F. Paul Blanock, Chairman

(This advertisement paid for by the Gloucester County Democratic Committee, the Mathews County Democratic Committee and the Democratic National Committee)

(11)

# "A TESTED AND TRUSTWORTHY TEAM"

**PRESIDENT**  
**Jimmy**  
**Carter**



**VICE**  
**PRESIDENT**  
**Walter**  
**Mondale**

*Take a minute to read the Real Carter record!*

- Created 8-1/2 million new jobs in the economy—a greater increase than in any comparable period in our history.
- Had four of every five bills sent to Congress passed—a record every bit as impressive as Lyndon Johnson's and John Kennedy's.
- Won enactment of America's first comprehensive energy plan—a plan that will make America less dependent on foreign oil and more secure in the future.
- Passed the Windfall Profits Tax—a tax which takes unearned profits from the big oil companies and gives the money to those who cannot afford to heat their homes.
- Hammered out the Middle East Peace Treaty between Israel and Egypt—a framework for peace in the future.

- Appointed more women to his Cabinet than any other President in history.
  - Appointed more Blacks, Hispanics, and other minorities to judicial positions than all other presidents combined.
  - Saved the Social Security system from certain bankruptcy.
  - Reduced the Federal work force by over 20,000 employees—the first reduction in its size since the 1920's.
  - Deregulated the airline and trucking industries, saving consumers millions of dollars.
  - Increased federal support for education by 70%.
- With a record like this, President Carter and Vice President Mondale have earned their second term. Re-elect President Carter on November 4th. Keep him working for your future.

**On Tuesday, Nov. 4th, Vote Carter-Mondale  
For Goochland-For Virginia  
FOR AMERICA!**

Paid for by the Democratic Committee of Goochland County  
Nancy T. Bowles, Chairman

8 2 0 4 0 3 3 0 1 9 1

(II)



(Paid Political Advertisement)

(Paid Political Advertisement)

## Small Town America Can Depend On Jimmy Carter

# Jimmy Carter Is A Democrat Who Understands Farm Families And Rural Problems



### HE ADVOCATES:

1. Price support and acreage allotment for tobacco;
2. High base price supports for dairy farms;
3. Protection of beef cattle farmers from imports;
4. Development of export markets to maintain reasonable grain prices.

In Virginia, NET farm income increased 71% from \$220 million in 1976 to \$375 million in 1979.

Virginia's share of total US exports has increased dramatically from 1976 to 1979. Farmers Home Administration loans for business and industry in rural areas have increased 235% since 1977 and farm operating and ownership loans have increased 102%.

**A President  
From Rural America  
And  
For Rural America**

# VOTE CARTER NOVEMBER 4

THE BOTETOURT COUNTY NEWS  
and  
THE FINCASTLE HERALD

Botetourt's ALL COUNTY Newspaper--Established 1866--Our 114th Year Of Service

VOLUME 144 NUMBER 64 HOME NEWS EVERY WEEK FINCASTLE, VIRGINIA 24600 TWENTY CENTS PER COPY THURSDAY, OCTOBER 28, 1980

82040330193

The Democratic Committee  
Urges All Voters In Botetourt County



To  
Vote On Tuesday  
November 4th  
For  
Experience And  
Intelligence  
Re-Elect  
President Carter  
And  
V-Pres. Mondale

Paid for by the authority of Shirley Stuckey, treasurer of the Botetourt County Democratic Committee.

EXHIBIT I

(2)

3 2 0 4 0 3 3 0 1 9 4



**The Weather**

Misty clear and a little warmer tonight. With the warming trend, there is a chance of showers tomorrow. See details on page 2.

Classified Ads 733-3486

# The Progress-Index

Serving Petersburg, Colonial Heights, Hopewell, Va., And Surrounding Counties

**Day 366**  
Free Our Hostages

Home Delivery 785-1133

Vol. 116—No. 122

Monday, November 3, 1980

(USPS 447-090)

One Section—14 Pages

Price 25 Cents

(Paid Political Advertisement)

## VOTE and RE-ELECT

### President Carter and Vice President Mondale.

A tested and trustworthy team.



#### A RECORD OF ACHIEVEMENT.

- Concern for senior citizens, health and quality of life
- More than 8 1/2 million new jobs
- Increased the nation's commitment to strong national defense
- Defender of human rights and a leader as a peacemaker
- Reorganization and better management of federal government
- Appointed more Blacks, Hispanics and other minorities to government positions, boards and commissions
- Reduced gasoline consumption by 12%, achieved passage of the Windfall Profits Tax

PHONE 486-6394 FOR TRANSPORTATION TO THE POLLS

Paid for and authorized by the Hopewell Democratic Committee, John Parolich, Treasurer.

8 2 0 4 0 3 3 0 1 9 5

# MARTINSVILLE BULLETIN

MARTINSVILLE, VIRGINIA  
SUNDAY, NOVEMBER 2, 1980  
VOLUME 81, NO. 283  
PRICE THIRTY-FIVE CENTS

**CARTER**

★ for President ★



... In 1976 Jimmy Carter  
Carried Martinsville & Henry County  
.. do Your Part Toward A  
Better Tomorrow ...

**Continue To Vote  
Democratic!!**

Vote Carter Mondale

EXHIBIT K

8 2 0 4 0 3 3 0 1 9 6

MARTINSVILLE, VIRGINIA  
FRIDAY, NOVEMBER 3, 1980  
VOLUME 51, NO. 264  
PRICE TWENTY CENTS

# MARTINSVILLE BULLETIN

**CARTER**  
★ for President ★



... In 1976 Jimmy Carter  
Carried Martinsville & Henry County  
... do Your Part Toward A  
Better Tomorrow ...  
**Continue To Vote  
Democratic!!**

EXHIBIT L

Since 1869

# Sentinel

11th YEAR NO. 30 • THURSDAY, OCTOBER 24, 1980 • 15 CENTS

.....	10
.....	11
.....	12
.....	13

FOR POL. ACT.

VOTE

TUESDAY NOVEMBER 4, 1980

**DEMOCRATIC PARTY**  
**JIMMY CARTER, PRESIDENT**  
**WALTER F. MONDALE, VICE PRES.**

APPLICANTS FOR ABSENTEE BALLOTS MUST BE FILED  
 NO LATER THAN 5 PM SATURDAY, NOVEMBER 1 .

IF YOU NEED TRANSPORTATION TO THE POLLS ON  
 ELECTION DAY CALL CARTER-MONDALE NEIGHBORHOODS  
**636-1638**

BY AUTHORITY OF: FRANCES EVERSOLE, PRES.  
 WARREN COUNTY DEMOCRATIC COMMITTEE

Re-Elect  
**President Carter**  
 and  
**Vice President Mondale**



A Tested and  
 Trustworthy Team.  
 Vote Democratic Nov. 4

82040330197

EXHIBIT M

II

8 2 0 4 0 3 3 0 1 9 8

*Blue Devils remain  
in championship chase*

Sports--Page 2A

INSIDE TODAY

Sports .....	2A, 3A	School News .....	1AA
Classified .....	4A, 5A	About People .....	2AA
Obituaries .....	7A	Ann Landers .....	2AA
What's Happening .....	8A	Horoscope .....	3AA
Movie Guide .....	8A	School menus .....	4AA

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WARRANT, DOUGLAS S.  
P.O. BOX 227  
GALAX, VA. 24333

olved  
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FRIDAY

# The Gazette

"To Give the News Impartially Without Fear or Favor"

October 31, 1980

Serving the City of Galax, Carroll and Grayson Counties.

103rd Year - No. 130

12-30-80

**For Continued  
Peace and Progress**

**VOTE  
CARTER/MONDALE**

**Tuesday, Nov. 4th.**



Re-Elect President Carter  
and Vice President Mondale.  
The Democrats.  
For a better tomorrow.

Paid For By Authority of Ronnie Abnerman, Treasurer  
Galax Democratic Committee & Ron Farnell, Treasurer  
Grayson Democratic Committee

**SEDAM & HERGE**

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

7600 OLD SPRINGHOUSE ROAD

MCLEAN, VIRGINIA 22102

(703) 821-1000

DEC 22 1980  
911075

GLENN J. SEDAM, JR.  
J. CURTIS HERGE

ROBERT R. SPARKS, JR.  
MICHAEL D. HUGHES  
A. MARK CHRISTOPHER  
KAREN LUSSEN BLAIR  
JOHN ROBERT CLARK III  
J. STANLEY PAYNE, JR.

1700 PENNSYLVANIA AVENUE, N.W.  
WASHINGTON, D.C. 20006  
(202) 363-7124  
TWA/TELEX 710-631-0896  
CABLE: SEDAMHERGE

December 22, 1980

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

Dear Members of the Commission:

This letter constitutes a complaint filed on behalf of our client, Republican Party of Virginia, 115 East Grace Street, Richmond, Virginia 23219, a political committee as defined under 2 U.S.C. §431(c), against the Democratic County Committee of Lee County, Virginia, Mr. Paul D. Harris, Chairman, Post Office Box 404, Jonesville, Virginia 24263.

Attached hereto as Exhibit A is a certified true transcription of a tape recording of a commercial advocating the election of Jimmy Carter which, upon information and belief, was aired by WSWV AM/FM Radio Station, 311 Woodway Road, Pennington Gap, Virginia 24277. Attached also as Exhibit B is, upon information and belief, a copy of the contract between WSWV Radio Station and the Democratic Committee of Lee County, Virginia, for the broadcasting of the commercial nine times between November 1, 1980 and November 4, 1980.

that: 2 U.S.C. §441(a)(d)(1) states in applicable part,

"a national committee of a political party and a state committee of a political party, including any subordinate committee of a state committee may make expenditures in connection with the general election campaign of candidates for federal office..."

00 DEC 29 11:04

RECEIVED  
FEB 11 1981

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(11)

General Counsel  
Federal Election Commission  
Page Two  
December 22, 1980

National party committees are limited by 2 U.S.C. §441(a)(d)(2), 11 CFR 110.7(a)(1) and (2), to "expenditures which do not exceed an amount equal to 2 cents multiplied by the voting age population of the United States..."

11 CFR 110.7(a)(4) states that:

"The National Committee of a political party may make expenditures authorized by this section through any agent, including state and subordinate party committees."

In AO 1980-87, the Federal Election Commission determined that the provisions of the Federal Election Campaign Act, and the Regulations promulgated by the Commission which are cited above, restrict the activities of local party committees, so that expenditures for radio advertisements in support of presidential and vice presidential candidates can only be made if authorized and reported by the national committee.

The advertisement disclaimer implies that the advertisement was not paid for by the Democratic County Committee of Lee County, Virginia, as an agent of the Democratic National Committee. If the Democratic National Committee neither authorized nor reported the expenditure for the radio advertisement, the expenditures were made in violation of the Federal Election Campaign Laws.

11 CFR §110.11 (a)(1) states that all disclaimers:

[S]hall appear or be presented in a clear and conspicuous manner to give the reader, observer or listener adequate notice of the identity of persons who paid for or who authorized the communication...

Even if the Democratic County Committee of Lee County, Virginia, acted as an agent for the Democratic National Committee when it contracted with WSWV Radio Station

82040330200

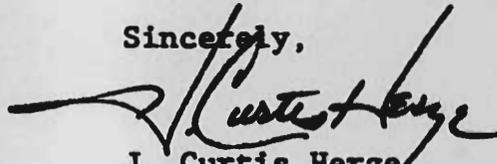
(11)

General Counsel  
Federal Election Commission  
Page Three  
December 22, 1980

for the broadcasting of the advertisement, the disclaimer  
broadcasted with the advertisement violated 11 CFR §110.11(a)(1).

Your prompt attention to this complaint would be  
appreciated.

Sincerely,



J. Curtis Herge  
Counsel for the Republican  
Party of Virginia

Enclosures

Subscribed and sworn to before me this 22<sup>nd</sup> day of  
December, 1980.

Cynthia D. McLarty  
Notary Public

My commission expires: December 5, 1982



82040330201

(104)

The following, a paid political program.

Voters of Lee County, we appealed to you earlier this year in an effort to get you to vote to defeat the bond referendum proposed by the Republican Party. We stated the facts concerning what would happen if the referendum passed. The voters ignored our pleas, and passed the referendum. Now you, your children, and the County are the losers. The County is further in debt, the services have been cut, all of you have had an enormous tax increase. This has imposed a terrible burden on you, the taxpayers; and, has served one purpose, and one purpose only: to employ and raise the salaries of incompetent Republican employees. In last year's County election, the voters were so impressed by Republican false propaganda that they refused to listen to the truth from any Democrat concerning the affairs of Lee County. Now that the smoke has cleared, and you have been shocked into reality, we would like to relate to you the actual facts of what has happened in Lee County in recent years.

In the County election of 1971, the Republican party gained control of the County Board of Supervisors. During their 4-year term, they had their plans drawn for the construction of a new courthouse and appropriated the first money toward that project. Plans were continuing when they

82040330202



82040330203

were defeated for reelection in 1975. After their defeat, they held numerous meetings to spend all the County money, so the Democrats would go into office with no money to operate on. As if that wasn't enough, they were successful in getting the \$1,000,000.00 in Federal funds, which Lee County was supposed to get for the courthouse, diverted to another county. After they had succeeded in bankrupting the County, they started an intense propaganda campaign, blaming the Democrats for building the courthouse, and putting the County into bankruptcy. They spread these falsehoods County-wide, every day for 4 years. Unfortunately, the people believed their falsehoods and swept them into office last year. They then led the voters into passing the bond referendum, by telling them if they didn't pass it, their taxes would be raised, schools would be closed, and numerous other falsehoods. This is only the first year of their term. Wait until you have endured 3 more years of it.

We now have another election at hand, Tuesday, November 4th. Jimmy Carter is a capable, honest, hardworking Christian man. He has worked hard to restore the respect and integrity of this nation after it was destroyed during the Nixon-Agnew Administration. He admits his mistakes, which are far outweighed by his accomplishments. He is not responsible for inflation, which is a world-wide problem. He will keep this country at peace.

Your other choice for President, Ronald Reagan, has the same qualifications for that position as your Lee County Board of Supervisors has for governing the County.

(III)

Don't vote to put the Federal Government in the hands of an incompetent person, who might plunge us into war at any time. Don't make another mistake! Be sure to vote November 4th. Vote for yourself, your children, your County, and your nation. Vote to reelect Jimmy Carter, President.

The preceding paid for and authorized by the Lee County Democratic Committee, Brenda Brooks, Treasurer.

*I certify that this is a true transcription:*

*December 22, 1980  
Cynthia D. McFarty,  
Notary Public*

*My Commission Expires: December 5, 1982*



82040330204

*(W)*

# AGREEMENT FORM FOR POLITICAL BROADCASTS

STATION and LOCATION WLSR-TV, Danville, Va. 10/31 1980

I, Jack Smith & Bobby Bare (being) Jimmy Carter  
(on behalf of) The Lee County Democratic Party

a legally qualified candidate of the Democrat political party for the office of President  
of the U. S.

in the (Presidential) General election to be held on 11/4/80, do hereby request station time as follows:

LENGTH OF BROADCAST	HOUR	DAYS	TIMES PER WEEK	TOTAL NO. WEEKS	RATE
5 min.		3	9	1	\$6.50
30 Min (Bobby Bare)		1	1	1	\$20.00

DATE OF FIRST BROADCAST <u>11/1/80</u>	DATE OF LAST BROADCAST <u>11/4/80</u>	Total Charges: <u>\$20.00</u> <u>\$58.50</u> <u>\$78.50</u>
---	--	---

The broadcast time will be used by The Lee Co. Democratic Party  
I represent that the advance payment for the above-described broadcast time has been furnished by

Lee County Democratic Party, Barbara Brink,  
Treasurer.

and you are authorized to so describe that sponsor in your log and to announce the program as paid for by such person or entity. The entity furnishing the payment, if other than an individual person, is: ( ) a corporation; (X) a committee; ( ) an association; or ( ) other unincorporated group. The names and offices of the chief executive officers of the entity are: \_\_\_\_\_

It is my understanding that: If the time is to be used by the candidate himself within 45 days of a primary or primary runoff election, or within 60 days of a general or special election, the above charges represent the lowest unit charge of the station for the same class and amount of time for the same period; where the use is by a person or entity other than the candidate or is by the candidate but outside the aforementioned 45 or 60 day periods, the above charges do not exceed the charges made for comparable use of such station by other users.

It is agreed that use of the station for the above-stated purposes will be governed by the Communications Act of 1934, as amended, and the FCC's rules and regulations, particularly those provisions reprinted on the back hereof, which I have read and understand. I further agree to indemnify and hold harmless the station for any damages or liability that may ensue from the performance of the above-stated broadcasts. For the above-stated broadcasts I also agree to prepare a script or transcription, which will be delivered to the station at least \_\_\_\_\_ before the time of the scheduled broadcasts; (note: the two preceding sentences are not applicable if the candidate is personally using the time).

Date: 10/30/80 ✓ Jack Smith  
(Candidate, Supporter or Agent)

(III)  
Accepted }  
Rejected } by Barbara Brink Title Officer Mgr.  
Wayne Simpson (on)

This application, whether accepted or rejected, will be available for public inspection for a period of two years in accordance with FCC regulations (AM, Section 73.120; FM, Section 73.290; TV, Section 73.657).

82040330205

## LAWS AND REGULATIONS GOVERNING POLITICAL BROADCASTS

*From the Communications Act of 1934, as amended:*

Section 312. (a) The Commission may revoke any station license or construction permit—

(7) for willful or repeated failure to allow reasonable access to or to permit purchase of reasonable amounts of time for the use of a broadcasting station by a legally qualified candidate for Federal elective office on behalf of his candidacy.

Section 315. (a) If any licensee shall permit any person who is a legally qualified candidate for any public office to use a broadcasting station, he shall afford equal opportunities to all other such candidates for that office in the use of such broadcasting station: *Provided*, That such licensee shall have no power of censorship over the material broadcast under the provisions of this section. No obligation is imposed under this subsection upon any licensee to allow the use of its station by any such candidate. Appearance by a legally qualified candidate on any--

- (1) bona fide newscast,
- (2) bona fide news interview,
- (3) bona fide news documentary (if the appearance of the candidate is incidental to the presentation of the subject or subjects covered by the news documentary), or
- (4) on-the-spot coverage of bona fide news events (including but not limited to political conventions and activities incidental thereto), shall not be deemed to be use of a broadcasting station within the meaning of this subsection. Nothing in the foregoing sentence shall be construed as relieving broadcasters, in connection with the presentation of newscasts, news interviews, news documentaries, and on-the-spot coverage of news events, from the obligation imposed upon them under this Act to operate in the public interest and to afford reasonable opportunity for the discussion of conflicting views on issues of public importance.

(b) The charges made for the use of any broadcasting station by any person who is a legally qualified candidate for any public office in connection with his campaign for nomination for election, or election, to such office shall not exceed—

(1) during the forty-five days preceding the date of a primary or primary runoff election and during the sixty days preceding the date of a general or special election in which such person is a candidate, the lowest unit charge of the station for the same class and amount of time for the same period; and

(2) at any other time, the charges made for comparable use of such station by other users thereof.

(c) For the purposes of this section:

(1) The term "broadcasting station" includes a community antenna television system.

(2) The terms "licensee" and "station licensee" when used with respect to a community antenna television system, mean the operator of such system.

(d) The Commission shall prescribe appropriate rules and regulations to carry out the provisions of this section.

*From the Rules of the Commission Governing Radio Broadcast Services. (The foregoing Sections of the Communications Act govern any inconsistencies between the following rules and those Sections):*

Section 73.120. Broadcasts by candidates for public office

(a) Definitions. A "legally qualified candidate" means any person who has publicly announced that he is a candidate for nomination by a convention of a political party or for nomination or election in a primary, special, or general election, municipal, county, state or national, and who meets the qualifications prescribed by the applicable laws to hold the office for which he is a candidate, so that he may be

voted for by the electorate directly or by means of delegates or electors, and who:

- (1) has qualified for a place on the ballot or
- (2) is eligible under the applicable law to be voted for by sticker, by writing in his name on the ballot, or by other method, and
  - (i) has been duly nominated by a political party which is commonly known and regarded as such, or
  - (ii) makes a substantial showing that he is a bona fide candidate for nomination or office, as the case may be.

(b) General requirements. No station licensee is required to permit the use of its facilities by any legally qualified candidate for public office, but if any licensee shall permit any such candidate to use its facilities, it shall afford equal opportunities to all other such candidates for that office to use such facilities: *Provided*, That such licensee shall have no power of censorship over the material broadcast by any such candidate.

(c) Rates and practices. (1) The rates, if any, charged all such candidates for the same office shall be uniform and shall not be rebated by any means direct or indirect. A candidate shall, in each case, be charged no more than the rate the station would charge if the candidate were a commercial advertiser whose advertising was directed to promoting its business within the same area as that encompassed by the particular office for which such person is a candidate. All discount privileges otherwise offered by a station to commercial advertisers shall be available upon equal terms to all candidates for public office. (2) In making time available to candidates for public office no licensee shall make any discrimination between candidates in charges, practices, regulations, facilities, or services for or in connection with the service rendered pursuant to this part, or make or give any preference to any candidate for public office or subject any such candidate to any prejudice or disadvantage; nor shall any licensee make any contract or other agreement which shall have the effect of permitting any legally qualified candidate for any public office to broadcast to the exclusion of other legally qualified candidates for the same public office.

(d) Records; inspection. Every licensee shall keep and permit public inspection of a complete record of all requests for broadcast time made by or on behalf of candidates for public office, together with an appropriate notation showing the disposition made by the licensee of such requests, and the charges made, if any, if request is granted. Such records shall be retained for a period of two years.

(e) Time of request. A request for equal opportunities must be submitted to the licensee within 1 week of the day on which the first prior use, giving rise to the right to equal opportunities, occurred: *Provided, however*, That where a person was not a candidate at the time of such first prior use, he shall submit his request within 1 week of the first subsequent use after he has become a legally qualified candidate for the office in question.

(f) Burden of proof. A candidate requesting such equal opportunities of the licensee, or complaining of non-compliance to the Commission shall have the burden of proving that he and his opponent are legally qualified candidates for the same public office. (Corresponding rules—FM, 73.290; TV, 73.657)

Section 73.112 Program Log:

(a) the following entries shall be made in the program log: • • •  
(1)(v) An entry for each program presenting a political candidate, showing the name and political affiliation of such candidate. • • •

(2)(iii) An entry showing that the appropriate announcement(s) (sponsorship, furnishing material or services, etc.) have been made as required by Section 317 of the Communications Act and § 73.119. A check mark will suffice but shall be made in such a way as to indicate the matter to which it relates. • • •

(4)(ii) An entry for each announcement presenting a political candidate, showing the name and political affiliation of such candidate.

(Corresponding Rules—FM, 73.282; TV, 73.670)

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Taylor

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600-3598

1400 ROSS BUILDING  
RICHMOND, VIRGINIA 23219

80 DEC 18 P12:31

December 8, 1980

80 DEC 18 P3:23

GENERAL COUNSEL

Federal Election Commission  
Washington, D. C. 20463

Attention: William Taylor, Esquire

Re: MUR 1328 (80)

Dear Mr. Taylor:

This letter is written as a response to the Federal Election Commission's notification of November 3, 1980 to the Amelia County Democratic Committee, Clarke County Democratic Committee and Rappahannock County Democratic Committee. Based on the information set forth below, each of these Committees believe that no further action should be taken against them in connection with this matter.

During the month of October each of these three Committees placed newspaper advertising in newspapers in their localities urging support of the Carter/Mondale ticket. At the time that the advertisements were placed each of these Committees were authorized by the Democratic National Committee to expend for these advertisements on behalf of the Democratic National Committee. The Democratic National Committee has agreed that the amounts spent on these advertisements by the three local Committees are authorized and ratified by them and will be reported by the Democratic National Committee as expenditures permitted the DNC under 2 USC 441a (d). The Democratic National Committee is forwarding directly to the Federal Election Commission a statement confirming this authorization.

For your information the expenditures made were as follows: the Amelia County Democratic Committee, for advertising in the Amelia Bulletin Monitor the amount of \$229.86; the Clarke County Democratic Committee, for advertising in The Clarke Courier, the amount of \$180.00; the Rappahannock County Democratic Committee, for advertising in The Rappahannock News, the amount of \$94.60.

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Since the advertisements were placed by the local Committees, the Committees placed on the disclaimer that the ads were by the authority of the local party chairman or treasurer, rather than the Democratic National Committee. However, under the circumstances, we do not believe that the Commission should take further action in the matter. For this reason we request the Commission to take no further action in this matter.

Because of the present time I am sending this letter directly to you although it is not yet subscribed and sworn to by the individual county chairmen. However, copies have been sent to the individual chairmen and the copies executed by them will be forwarded directly to you shortly.

Respectfully submitted,

Lawrence H. Framme, III  
Counsel for the Amelia  
County Democratic Committee,  
the Clarke County Democratic  
Committee, the Rappahannock  
Democratic Committee

We, the undersigned, believe that the foregoing is true to the best of our knowledge and belief.

Juan Whittington, Chairman  
Amelia Democratic Committee

Given under my hand this \_\_\_\_\_ day of \_\_\_\_\_,

198\_\_.

My commission expires: \_\_\_\_\_.

\_\_\_\_\_  
Notary Public

IV

82040330208

*Lawrence White*

Lawrence White, Chairman  
Clarke County Democratic Committee

Given under my hand this 15th day of December,

1980.

My commission expires:

Nov 4, 1984

*James O. Hudson*  
Notary Public

David Moore, Chairman  
Rappahannock Democratic Committee

Given under my hand this \_\_\_\_\_ day of \_\_\_\_\_,

198\_\_.

My commission expires:

\_\_\_\_\_

Notary Public

82040330209

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1400 ROSS BUILDING  
RICHMOND, VIRGINIA 23219

81 JAN 26 A 9: 54

January 20, 1981

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

MUR 1328

Gentlemen:

This response to the above-named Complaint is filed on behalf of all local Democratic Committees named in the Addendum to Complaint filed by the Virginia Republican Party with the Commission on December 15, 1980. Documents authorizing me to represent the Green, Goochland, Lunenburg, Botetourt, Henry, Warren and Galax committees are enclosed. Similar documents from the Orange and Gloucester committees have already been sent directly to you. Documents from the Roanoke, Mathews, Hopewell, Martinsville and Grayson committees are being sent directly to you. All of these committees deny they have violated the Federal Election Campaign Act of 1971, but state that if a technical violation did occur, such was inadvertent and unintentional and in no way prejudiced any candidate.

Following a response containing points common to all committees complained of, individual committee responses will be set forth in the same order that they appear in the Complaint.

Matters Common To All Of The Committees Complained Of

Several points are common to all of the committees complained of by the Republican Party. With the exception of the advertisement placed by the Hopewell City Democratic Committee in the Petersburg Progress Index, all advertisements were placed in local, rural newspapers of very limited circulation. None of these newspapers were of daily circulation. While the Petersburg Progress Index has a daily circulation, its circulation is limited to the area of Petersburg, Virginia and the immediately surrounding counties. There was no

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intent on the part of any committee to violate the Act. In those instances set forth below where committees made inquiries about their ability to advertise, they were unfortunately given incorrect information by persons in the Virginia Carter/Mondale Campaign.

Those committees who placed ads are seeking to cure any possible technical violation of the Act by requesting the Democratic Carter/Mondale Committee to authorize their expenditures under Section 441a (d) of the Federal Election Campaign Act. Certainly, the limited nature of the ads, their limited circulation and the outcome of the election in Virginia (Mr. Reagan carried Virginia by 237,435 votes), demonstrates that there was no prejudice to any candidate by the placement of the ads.

Individual Responses

1. Roanoke County Democratic Committee, Betty Ann Saunders, Chairman. The Roanoke County Democratic Committee did not place any newspaper advertisements in connection with the 1980 presidential election. The advertisement listed as Exhibit A in the Complaint bears a disclaimer stating that it was placed on the authority of the Roanoke City Democratic Committee. The Roanoke City Democratic Committee is a different entity than the Roanoke County Democratic Committee. The City of Roanoke is an independent city having its own Democratic committee. The Roanoke County Democratic Committee, therefore, denies that it violated the Federal Election Campaign Act of 1971.
2. Greene County Democratic Committee, Constance Dudley, Chairman. The newspaper advertisement attached to the Complaint as Exhibit C was placed by the Greene County Democratic Committee. Its cost of \$86.24 was paid by the Greene County Democratic Committee. The Greene County Committee, like many Virginia local committees, routinely place advertising advocating the election of Democratic candidates in a local newspaper shortly before elections.

The officers of the Greene County Democratic Committee who placed the advertisement were unaware of that portion of the Federal Election Campaign Act prohibiting local party committees from placing advertisements at their own expense which unambiguously refer to a presidential candidate. The Committee has requested

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ary 20, 1981  
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Democratic National Committee under authority of Section 441a (d). The Democratic National Committee has not yet responded to this request, but the Committee expects it to act favorably on its request and to report this expenditure in its next report to the Commission. The Greene County Democratic Committee contends that with the reporting by the Democratic National Committee there will be no violation of the Federal Election Campaign Act and, therefore, asks the Commission to dismiss the Complaint against it.

3. Orange County Democratic Committee, H. Watkins Ellerson, III, Chairman. The Addendum to the Complaint filed by the Virginia Republican Party did not contain a copy of any advertisement placed by the Orange County Democratic Committee. The Orange County Democratic Committee did not authorize the placement of any newspaper advertising advocating the election of a presidential candidate in the 1980 election. The Orange County Democratic Committee is aware that an advertisement advocating the re-election of President Carter and Walter Mondale was placed by two individual members of the Committee and paid for with their own funds. To the best of the knowledge of the Orange County Democratic Committee that advertisement was placed by the Committee members as individuals and was not placed in consultation with, at the expense of or with the authorization of the Orange County Democratic Committee. Also, to the best of the Committee's knowledge, the advertisement was not placed at the direction of or in consultation with the Carter/Mondale Presidential Campaign.

Based on the facts set forth above, the Orange County Democratic Committee does not believe that it violated the Federal Election Campaign Act of 1971 and, therefore, asks the Commission to dismiss the Complaint against it.

4. Gloucester County Democratic Committee, C. F. Hicks, Chairman, and Mathews County Democratic Committee, F. Paul Blanock, Chairman. The advertisement attached as Exhibit F to the Addendum to the Complaint of the Virginia Republican Party was placed and paid for by the Gloucester County Democratic Committee and the

IV

Mathews County Democratic Committee. The cost of the advertisement was \$195.00. At the time the advertisement was placed and at this time the Gloucester and Mathews County Democratic Committees believe that they were authorized to place the advertisement as agents of the Democratic National Committee pursuant to the Democratic National Committee's authority to place such advertisements under Section 441a (d) of the Federal Election Campaign Act. Immediately before placing the advertisement, the Chairman of the Gloucester County Democratic Committee was advised that the Democratic National Committee had authorized the placement of the advertisement. At this time a request has been made to the Democratic National Committee to report the expenditure in its next report to the Federal Election Commission. While a formal response to this request has not yet been received from the Democratic National Committee, the Gloucester and Mathews Democratic Committees believe that a favorable response will be received. For this reason, the Gloucester and Mathews County Democratic Committees believe that they did not violate the Federal Election Campaign Act of 1971 and, therefore, ask the Commission to dismiss the complaint against them. It should be noted that the disclaimer on the advertisement does state that it was paid for by the Democratic National Committee in addition to other sources.

5. Goochland County Democratic Committee, Nancy Bowles, Chairman. The advertisement attached as Exhibit G to the Addendum to the Complaint of the Virginia Republican Party was placed by the Goochland County Democratic Committee and paid for by that Committee. The cost of the advertisement was \$123.48. The circumstances surrounding the placement of the advertisement are similar to those of the advertisement placed by the Greene County Democratic Committee. The Goochland County Democratic Committee has customarily and routinely placed advertisements advocating the election of Democratic candidates in its local newspaper shortly before each election. At the time that the advertisement was placed, the officers of the Goochland County Democratic Committee were unaware of those portions of the Federal Election Campaign Act prohibiting local committees from placing advertisements

unambiguously referring to presidential candidates at their own expense.

The Goochland County Democratic Committee has requested the Democratic National Committee to ratify its expenditure as an agent of the Democratic National Committee and to report the expenditure on the next report to the Federal Election Commission. The Goochland County Democratic Committee expects a favorable response to this request. Based on this, the Goochland County Democratic Committee believes that it did not violate the Federal Election Campaign Act of 1971 and, therefore, asks the Commission to dismiss the complaint against it.

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6. Lunenburg County Democratic Committee, James Edmunds, Chairman. The Lunenburg County Democratic Committee did place the advertisement attached as Exhibit H to the Addendum to Complaint filed by the Republican Party of Virginia. Like the Greene and Goochland County Committees, the Lunenburg County Democratic Committee customarily places advertising advocating the election of Democratic candidates shortly before each election. At the time of placing the advertisement attached as Exhibit H, the Lunenburg County Democratic Committee was unaware of those portions of the Federal Election Campaign Act prohibiting local committees from placing such advertisements on their own account in presidential elections. The Lunenburg County Democratic Committee has requested the Democratic National Committee to ratify its expenditure for the advertisement in the amount of \$126.00 as an agency expenditure of the Democratic National Committee and that it be reported accordingly. On the basis of the above, the Lunenburg County Democratic Committee does not believe that it violated the Federal Election Campaign Act of 1971 and, therefore, requests the Commission to dismiss the Complaint against it.
  7. City Democratic Committee of Hopewell, Virginia, Hilda Traina, Chairman. The City Democratic Committee of Hopewell did place the advertisement attached as Exhibit J to the Addendum to Complaint of the Virginia Republican Party. The circumstances surrounding its placement are similar to those of Greene, Goochland and Lunenburg County. The City Democratic Committee of Hopewell customarily and
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9. The City Democratic Committee of Martinsville, Virginia Hall, Chairman, and Henry County Democratic Committee, F. E. Marsh, Chairman. The Martinsville City Democratic Committee and Henry County Democratic Committee jointly placed the advertisements attached as Exhibits K and L to the Addendum to Complaint of the Republican Party of Virginia. Before placing the advertisements the Chairman of the Martinsville City Democratic Committee inquired of the Virginia State Carter/Mondale Headquarters as to whether such advertisement was permissible. The Chairman was advised by someone at the Headquarters that such advertising was permissible as long as the total cost of the advertising did not exceed \$1,000.00. Based on this advice, the Chairman placed the advertising. At that time neither the Martinsville City Democratic Committee or the Henry County Democratic Committee were aware of the provisions of the Federal Election Campaign Act relating to advertising by a local party committee. The Martinsville City Democratic Committee and the Henry County Democratic Committee have requested the Democratic National Committee to ratify its expenditure of \$100.00 as an agency expenditure of the Democratic National Committee. It expects a favorable response from the Democratic National Committee and that the Democratic National Committee will report the expenditure accordingly. For these reasons the Martinsville City Democratic Committee and the Henry County Democratic Committee believe that they did not violate the Federal Election Campaign Act and, therefore, ask the Commission to dismiss the complaint against them.
10. Warren County Democratic Committee, Claude A. Stokes, Chairman. The Warren County Democratic Committee did place the advertisement attached as Exhibit M to the Addendum to Complaint of the Republican Party of Virginia. Circumstances surrounding the placement of that advertisement are similar to those of Greene, Goochland, Lunenburg and others. The Warren County Democratic Committee routinely and customarily places advertisements advocating the election of Democratic candidates immediately before each election. At the time of the placing of this advertisement, at a cost of \$86.00, the Warren County Democratic Committee was unaware of the provisions of the Federal Election

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Campaign Act of 1971 regarding the placement of such advertising by local committees. The Warren County Democratic Committee has now requested the Democratic National Committee to ratify its expenditure as an agency expenditure of the Democratic National Committee and to report it accordingly. It expects a favorable response by the Democratic National Committee. Therefore, the Warren County Democratic National Committee believes that it did not violate the Federal Election Campaign Act and, therefore, asks the Commission to dismiss the Complaint against it.

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11. Galax City Democratic Committee, Dr. Van B. McCarter, Chairman, and Grayson County Democratic Committee, Kenneth Broom, Chairman. The Galax City and Grayson County Democratic Committees jointly placed the advertisement attached as Exhibit N to the Addendum to Complaint of the Republican Party of Virginia. The cost of the advertisement, \$125.00, was jointly paid by the two Committees. Before placing the advertisement, the Chairman of the Grayson County Democratic Committee inquired of the Ninth District coordinator for the Carter/Mondale Presidential Campaign as to whether or not a local committee was permitted to place such advertising. He was advised by the coordinator that such advertising was permissible provided the total amount of the advertising did not exceed \$1,000.00. At the time of placing the advertisement neither the Grayson County nor Galax City Democratic Committee were aware of the provisions of the Federal Election Campaign Act governing the placement of advertising by local committees on their own account. The Grayson County and Galax City Democratic Committees have requested the Democratic National Committee to ratify their expenditures as agency expenditures and to report them in its next report to the Federal Election Commission. The Committees expect a favorable response from the Democratic National Committee. For these reasons the Grayson County and Galax City Committees believe that they did not violate the Federal Election Campaign Act and, therefore, ask the Commission to dismiss the Complaint against them.

Federal Election Commission  
January 20, 1981  
Page Nine

For the foregoing reasons, the Committees respectfully request the Commission to dismiss the complaints against them.

Because of the number of the Complaints included in the Addendum of the Republican Party and the fact that the committees involved are scattered throughout the state of Virginia, it is not possible to include a sworn statement of each of the committees involved in this response. However, this response does embody the facts recited to counsel by each of the committee chairmen. A copy of this response sworn to by each of the committee chairmen will be forwarded to the Commission directly from each chairman as soon as possible.

THE DEMOCRATIC COUNTY COMMITTEE OF ROANOKE COUNTY  
THE DEMOCRATIC COUNTY COMMITTEE OF GREENE COUNTY  
THE DEMOCRATIC COUNTY COMMITTEE OF ORANGE COUNTY  
THE DEMOCRATIC COUNTY COMMITTEE OF GLOUCESTER COUNTY  
THE DEMOCRATIC COUNTY COMMITTEE OF MATHEWS COUNTY  
THE DEMOCRATIC COUNTY COMMITTEE OF GOOCHLAND COUNTY  
THE DEMOCRATIC COUNTY COMMITTEE OF LUNENBURG COUNTY  
THE DEMOCRATIC CITY COMMITTEE OF HOPEWELL, VIRGINIA  
THE DEMOCRATIC COUNTY COMMITTEE OF BOTETOURT COUNTY  
THE DEMOCRATIC COUNTY COMMITTEE OF HENRY COUNTY  
THE DEMOCRATIC CITY COMMITTEE OF MARTINSVILLE, VIRGINIA  
THE DEMOCRATIC COUNTY COMMITTEE OF WARREN COUNTY  
THE DEMOCRATIC CITY COMMITTEE OF GALAX, VIRGINIA  
THE DEMOCRATIC COUNTY COMMITTEE OF GRAYSON COUNTY

By:

  
Lawrence H. Framme, III  
Counsel

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routinely places advertisements in its local newspaper advocating election of Democratic candidates before each election. The City Democratic Committee of Hopewell was unaware of the prohibitions of the Federal Election Campaign Act concerning payment for advertising unambiguously referring to presidential candidates on its own account. The City Democratic Committee of Hopewell has requested the Democratic National Committee to ratify its expenditure for the advertisement as an agency expenditure of the Democratic National Committee and that it report it accordingly. The City Democratic Committee of Hopewell anticipates a favorable response by the Democratic National Committee. Based on the above, the City Democratic Committee of Hopewell believes that it did not violate the Federal Election Campaign Act and, therefore, asks the Commission to dismiss the complaint against it.

8. Botetourt County Democratic Committee, Claude D. Carter, Chairman. The Botetourt County Democratic Committee did place the advertisement attached as Exhibit I to the Addendum to Complaint of the Republican Party of Virginia. The advertisement was paid for by that Committee at a cost of \$98.00.

Before running the advertisement, the Chairman of the Botetourt County Democratic Committee inquired of the Virginia State Carter/Mondale Headquarters whether such advertisement by local committees was permissible. The Chairman was advised by someone in the Virginia State Carter/Mondale Headquarters that such advertising was permissible as long as the total cost did not exceed \$1,000.00. At the time the Botetourt County Democratic Committee was unaware of the prohibitions of the Federal Election Campaign Act regarding placement of advertising unambiguously referring to presidential candidates on the account of the local committee. The Botetourt County Democratic Committee has requested the Democratic National Committee to ratify its expenditure as an agency expenditure of the Democratic National Committee and to report it to the Federal Election Commission accordingly. The Botetourt County Democratic Committee believes that the Democratic National Committee will act favorably on its request and for this reason does not believe that it violated the Federal Election Campaign Act. Accordingly, it requests the Commission to dismiss the Complaint against it.

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Taylor

31 FEB 9 49:49

To: Federal Election Commission  
Washington, D. C.  
Attn: William Taylor, Esquire  
Re: MUR-1328

Dear Mr. Taylor,

I have read the response filed in behalf of  
the Gloucester Democratic Committee and  
the facts stated therein are true to the best of  
my knowledge.

A. H. J.  
Chairman

Gloucester Democratic  
Committee

82040330219

State of Virginia

County of Gloucester, to-wit:

The foregoing instrument was acknowledged  
before me this 2nd day of February, 1981.

Betty Ann Burgess, Notary Public  
My comm. expires: March 27, 1982.

90:21d 6 83 18 31 FEB 9 P12:06

RECEIVED  
OFFICE OF THE  
GENERAL COUNSEL

V

Taylor

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81 JAN 28 9:03

To: Federal Election Commission  
Washington, D. C.  
Attn: William Taylor, Esquire  
  
Re: MUR-1328

Dear Mr. Taylor,

I have read the response filed in behalf of  
the WARREN COUNTY Democratic Committee and  
the facts stated therein are true to the best of  
my knowledge.

Claude A. Stokes, Jr.  
Chairman

WARREN COUNTY Democratic  
Committee

STATE OF VIRGINIA  
COUNTY OF WARREN, TO-WIT

I, Vernon T. MacTuck, A Notary Public in and  
for the State and County aforesaid, do hereby certify that  
Claude A. Stokes, Jr. whose name is signed above have this  
day personally appeared and acknowledged same before me in  
State and County aforesaid.

Given under my hand this 24th day of January, 1981  
My commission expires the 3rd day of February, 1981

Vernon T. MacTuck  
NOTARY PUBLIC

82040330220

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Taylor

9117D

81 JAN 28 9:03

To: Federal Election Commission  
Washington, D. C.  
Attn: William Taylor, Esquire  
  
Re: MUR-1328

Dear Mr. Taylor,

I have read the response filed in behalf of  
the GRAYSON/GALAX Democratic Committee and  
the facts stated therein are true to the best of  
my knowledge.

Van B. McCarter  
Chairman

GRAYSON CITY Democratic  
Committee

82040330221

STATE OF VIRGINIA

To-wit:

COUNTY OF GRAYSON

I, Anna H. Hodges, A Notary Public in the State and County Aforesaid do hereby  
certify that Van B. McCarter personally appeared before me this 26th day of  
January, 1981 and acknowledged the foregoing.



My Commission expires 2/11/81.

Anna H. Hodges  
Anna H. Hodges  
Notary Public

92:018 82 JAN 28 1981

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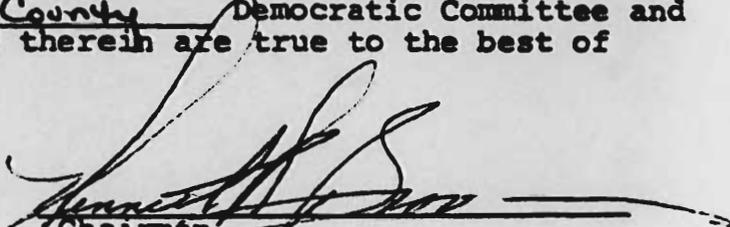
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FEB 11 1981

To: Federal Election Commission  
Washington, D. C.  
Attn: William Taylor, Esquire

Re: MUR-1328

Dear Mr. Taylor,

I have read the response filed in behalf of  
the Grayson County Democratic Committee and  
the facts stated therein are true to the best of  
my knowledge.

  
Chairman

Grayson County Democratic  
Committee

State of Virginia

County of Grayson, to wit:

The foregoing instrument was acknowledged before me this 26th day  
of January, 1981, by Kenneth R. Broome, Chairman of Grayson County  
Democratic Committee.

  
Notary Public

My Commission expires January 9, 1983.

82040330222

IV

81 JAN 26 AS: 48

To: Federal Election Commission  
Washington, D. C.  
Attn: William Taylor, Esquire  
Re: MUR-1328

Dear Mr. Taylor,

I have read the response filed in behalf of  
the Mathews Democratic Committee and  
the facts stated therein are true to the best of  
my knowledge.

F. Paul Blanock  
Chairman

Mathews Democratic  
Committee

Subscribed and sworn to before me this 22nd  
day of January, 1981, by F. Paul Blanock.

Roberta M. Hendrix  
Notary Public

My Commission expires: August 10, 1981

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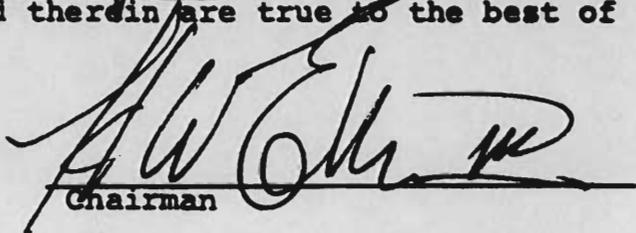
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81 JAN 26 09:48

To: Federal Election Commission  
Washington, D. C.  
Attn: William Taylor, Esquire  
  
Re: MUR-1328

Dear Mr. Taylor,

I have read the response filed in behalf of the Orange County Democratic Committee and the facts stated therein are true to the best of my knowledge.

  
Chairman

Orange County Democratic  
Committee

STATE OF VIRGINIA  
County of Orange, to-wit:

Subscribed and sworn to before me, a Notary Public for the aforesaid jurisdiction, this 22nd day of January, 1981, by H. Watkins Ellerson, III, Chairman, Orange County Democratic Committee.

My Commission expires: March 30, 1983

  
Notary Public

82040330224

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27 JAN 28 11:27

GENERAL INVESTIGATIVE  
DIVISION

GAC 3834

81 JAN 26 21:18

To: Federal Election Commission  
Washington, D. C.  
Attn: William Taylor, Esquire

Re: MUR-1328

Dear Mr. Taylor,

I have read the response filed in behalf of the Henry County Democratic Committee and the facts stated therein are true to the best of my knowledge.

F. E. March, Jr.  
Chairman

Henry County Democratic  
Committee

32040330225

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81 JAN 26 P 1: 16

To: Federal Election Commission  
 Washington, D. C.  
 Attn: William Taylor, Esquire

Re: MUR-1328

Dear Mr. Taylor,

I have read the response filed in behalf of  
 the Greene County Democratic Committee and  
 the facts stated therein are true to the best of  
 my knowledge.

*Constance J. Dudley*  
 Chairman

*Greene County* Democratic  
 Committee

*Audrey P. Morris*  
 1-22-81 Notary Public



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82040330226

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cc 3919

81 JAN 26 P 1: 18

To: Federal Election Commission  
Washington, D. C.  
Attn: William Taylor, Esquire

Re: MUR-1328

Dear Mr. Taylor,

I have read the response filed in behalf of the Moochland Democratic Committee and the facts stated therein are true to the best of my knowledge.

15

Nancy T. Bowles  
Chairman

Moochland Democratic  
Committee

STATE OF VIRGINIA,  
COUNTY OF FLUVANNA,

I hereby certify that the foregoing instrument was acknowledged before me this 23rd day of January, 1981, by Nancy T. Bowles.

Patricia M. Payne  
Notary Public

My Commission Expires: October 24, 1981.

92040330227

14

81 JAN 26 P 2: 39

GENERAL INVESTIGATIVE  
DIVISION  
FEDERAL BUREAU OF INVESTIGATION  
U.S. DEPARTMENT OF JUSTICE

Taylor

912077

Good 3916

21 FEB 5 All: 44

To: Federal Election Commission  
Washington, D. C.  
Attn: William Taylor, Esquire

Re: MUR-1328

Dear Mr. Taylor,

I have read the response filed in behalf of the Martinsville Democratic Committee and the facts stated therein are true to the best of my knowledge.

Virginia Hall  
Chairman

Martinsville Democratic Exec.  
Committee

2-3-81

Sworn to and subscribed before me this 3rd day of February, 1981

Ann B. Winn

Ann B. Winn, Notary Public  
My commission expires 9/26/83

82040330228

14

11 FEB 5 P 1: 56

RECEIVED  
GENERAL INVESTIGATIVE  
DIVISION

91 FEB 9 49: 32

To: Federal Election Commission  
Washington, D. C.  
Attn: William Taylor, Esquire

Re: MUR-1328

Dear Mr. Taylor,

I have read the response filed in behalf of  
the Polk County Democratic Committee and  
the facts stated therein are true to the best of  
my knowledge.

Walter A. Jones  
Chairman

Polk County Democratic  
Committee

82040330229

IV

To: Federal Election Commission  
Washington, D. C.  
Attn: William Taylor, Esquire

Re: MUR-1328

Dear Mr. Taylor,

I have read the response filed in behalf of  
the Hapewell Democratic Committee and  
the facts stated therein are true to the best of  
my knowledge.

Hilda Manieri Trama  
Chairman

Hapewell Democratic  
Committee

3408 Vinton Street

Hapewell, Virginia 23060

82040330230

IV

Lawrence White, Chairman  
Clarke County Democratic Committee

Given under my hand this \_\_\_\_\_ day of \_\_\_\_\_,  
198\_\_.

My commission expires: \_\_\_\_\_

Notary Public

David M Moore

David Moore, Chairman  
Rappahannock Democratic Committee

Given under my hand this 10 day of December,  
1980.

My commission expires: December 26, 1981

Sheila J. Estes  
Notary Public

82040330231

IV

61 JAN 26 49:49

To: Federal Election Commission  
Washington, D. C.  
Attn: William Taylor, Esquire

Re: MUR-1328

Dear Mr. Taylor,

I have read the response filed in behalf of the Lunenburg County Democratic Committee and the facts stated therein are true to the best of my knowledge.

  
Chairman

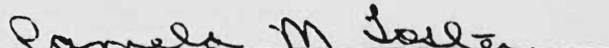
Lunenburg County Democratic  
Committee

State of Virginia,

County of Lunenburg, to-wit:

The foregoing instrument was acknowledged before me this 22nd day of January, 1981, by James T. Edmunds.

My commission expires: Sept. 13, 1983.

  
Notary Public

82040330232



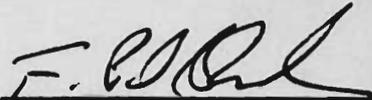
81 JAN 26 49:48

To: Federal Election Commission  
Washington, D. C.  
Attn: William Taylor, Esquire

Re: MUR-1328

Dear Mr. Taylor,

Lawrence H. Framme, III is authorized to represent the Mathews Democratic Committee in connection with the above-named complaint.

  
Chairman

Mathews Democratic  
Committee

82040330233

IV

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BI JAN 26 P 1: 17

To: Federal Election Commission  
 Washington, D. C.  
 Attn: William Taylor, Esquire

Re: MUR-1328

Dear Mr. Taylor,

I have read the response filed in behalf of the Botetount County Democratic Committee and the facts stated therein are true to the best of my knowledge. AS SHOWN ON Amended page six Attached hereto.

Robert D. Carter  
 Chairman R+1 Box 407, Dalawillo, Va 24083

Botetount County Democratic  
 Committee

82040330234

IV

1400 ROSS BUILDING  
RICHMOND, VIRGINIA 23210

March 10, 1981

Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

Attn: William Taylor, Esquire

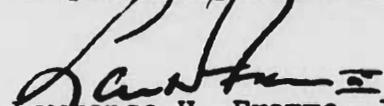
Re: MUR 1358 (80)

Dear Mr. Taylor:

This response is filed on behalf of the Lee County Democratic Committee in connection with the above-numbered complaint. Please reference our earlier response dated January 20, 1981 filed on behalf of several other Virginia Democratic committees.

The Lee County Democratic Committee authorized non-advertisements advocating the election of Jimmy Carter as President to be aired on WSWV Radio, Pennington Gap, Virginia. At the time the Lee County Democratic Committee believed they were authorized to do so on behalf of the Democratic National Committee. A agency agreement is being executed by the Democratic National Committee acknowledging the actions of the Lee County Committee and agreeing to report its expenditure in the amount of \$78.50 to the Federal Election Commission in its next report. Because of this, the Lee County Democratic Committee does not believe that it violated the Federal Election Campaign Act and, therefore, respectfully requests the Commission to dismiss the complaint against it.

Respectfully submitted,

  
Lawrence H. Framme, III

LHF, III/cfr

P. S. An acknowledgment and a representation authorization will be forwarded directly to you from the Lee County Democratic Committee Chairman.

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GENERAL INVESTIGATIVE  
DIVISION

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**DEMOCRATIC  
NATIONAL COMMITTEE**

1625 Massachusetts Ave., N.W. Washington, D.C. 20036 (202) 777-3300

81 MAR 30 P 1: 48

March 26, 1981

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

We are submitting a clarification of an agreement dated March 10, 1981 between the Democratic National Committee and Mr. Larry Framme, the attorney for the respondents (sixteen local Virginia Democratic Committees).

The agreement was meant to be a ratification of the actions of the sixteen local Democratic Committees and the committees were acting as designated agents of the Democratic National Committee for purposes of making expenditures pursuant to 2 U.S.C. § 441a(d)(2) as specified in the agreement.

Sincerely,

*Pat Whiteaker*

Patricia Whiteaker  
Controller

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31 MAR 30 P 3: 09

GENERAL COUNSEL



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Taylor

**DEMOCRATIC  
NATIONAL COMMITTEE**

1625 Massachusetts Ave., N.W. Washington, D.C. 20036 (202) 777-5000

March 10, 1981

Mr. Lawrence H. Framme, III  
1400 Ross Building  
Richmond, VA 23219

Dear Mr. Framme:

This letter authorizes the Committees set forth as attached to make expenditures in the State of Virginia as duly authorized agents of the Democratic National Committee (DNC), for the purpose and subject to the conditions specified herein.

The Committees are authorized to make expenditures, limited and outlined as attached, for the purpose of influencing the election of Jimmy Carter and Walter Mondale on November 4, 1980, subject to the following terms and conditions:

1. The Committees agree to comply fully with the applicable provisions of the Federal Election Campaign Act of 1971, as amended (2 U.S.C. § et seq.) the "Act"), and with any other applicable provision of State and Federal law.

2. The Committees shall supply the DNC with an itemized account of all expenditures made by the Committees pursuant to this agreement, as required under section 302(c) of the Act (2 U.S.C. § 432(c)). Each account shall provide the name and address of every person to whom any such expenditure was made, the date and amount thereof, and the purpose for which such expenditure was made, including a receipt, invoice, or cancelled check.

Any amount expended by the Committees pursuant to this agreement shall be deemed to have been expended by the DNC, shall be applied against the expenditure limit for the national committee of a political party specified in section 315(d)(2) of the Act (2 U.S.C. § 441a(d)(2)).

This agency agreement shall automatically and immediately terminate if the Committees fail to comply with any term or condition in this agreement, and shall otherwise be terminable by the DNC at will upon written notification thereof to the Treasurer or Chairperson of the Committee.

92040330237

*Attachment*

31 MAR 19 4:47 PM

RECEIVED  
GENERAL COUNSEL

As attorney for the Committees, please date and sign both copies of this letter; retain one copy; and return the other copy to the Democratic National Committee, 1625 Massachusetts Avenue, N.W., Washington, D.C. 20036, Attention: Patricia Whiteaker.

Sincerely,

*Charles E. Curry*  
Charles E. Curry  
Treasurer

I have read this agency agreement, and by my signature below, the Committees fully accept and agree to abide by the terms and conditions of this agreement.

Date: 3/16/81

Names of Committees:

- Democratic County of Grayson County
- Democratic City Committee of Galax
- Democratic County Committee of Lunenburg Couty
- Democratic County Committee of Goochland County
- Democratic City of Martinsville
- Democratic County Committee of Henry County
- Democratic County Committee of Greene County
- Democratic County Committee of Warren County
- Democratic County Committee of Botetourt County
- Democratic County Committee of Mathews County
- Democratic County Committee of Gloucester County
- Democratic Committee of Clarke County
- Democratic Committee of Amelia County
- Democratic City Committee of Hopewille
- Democratic Committee of Rappahannock County
- Democratic County Committee of Lee County

BY *P. D. [Signature]* *Attorney for the above*  
Name Title  
*named committees*

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*(attachment v)*

ATTACHMENT

<u>Name of Committee</u>	<u>Payee</u>	<u>Agreed Amount</u>
1) Democratic County Committee of Grayson County Route 1, Box 45 Fries, VA 24330 - and - Democratic City Committee of Galax 212 West Center Street Galax, VA 24333	The Gazette Galax, VA	\$125.00
2) Democratic County Committee of Lunenburg County Kenbridge, VA 23860	Kenbridge-Victoria Dispatch Kenbridge, VA	\$126.00
3) Democratic County Committee of Goochland County Kents Store, VA 23084	Goochland Gazette Goochland, VA	\$123.48
349 Democratic City Committee of Martinsville 1605 Mulberry Road Martinsville, VA 24112 -and -		
330 Democratic County Committee of Henry County Basset, VA 24055	Martinsville Bulletin Martinsville, VA	\$100.00
33 Democratic County Committee of Greene County Route 1, Box 221K Standardsville, VA 22973	Greene County Record Standardsville, VA 22973	\$ 86.24
40 Democratic County Committee of Warren County 1016 Virginia Avenue Front Royal, VA 22630	Warren Sentinel Front Royal, VA 22630	\$ 86.00
6 7) Democratic County Committee of Botetourt County P.O. Box 368 Daleville, VA 24083	Fincastle Herald Fincastle, VA	\$ 98.00
8) Democratic County Committee of Mathews County Mathews, VA 23109 - and - Democratic County Committee of Gloucester County Gloucester, VA 23-61	Gloucester Mathews Gazette Journal Gloucester, VA	\$195.00

<u>Name of Committee</u>	<u>Fee</u>	<u>Assessed Amount</u>
9) Democratic Committee of Clarke County Battleton Drive Berryville, VA 22611	Clark County Courier Berryville, VA 22611	\$180.00
10) Democratic Committee of Amelia County Route 4, Box 136 Amelia, VA 23002	Amelia Bulletin Monitor Amelia Courthouse, VA 22302	\$229.85
11) Democratic City Committee of Hopewell 3408 Vinton Street Hopewell, VA 23860	Progress-Index 15 Franklin Petersburg, VA	\$ 83.16
12) Democratic Committee of Rappahannock County Washington, VA 22747	Fauquier Times Democrat Co. P.O. Box 631 Arlington, VA 22186	\$ 94.60
13) Democratic County Committee of Lee County P.O. Box 404 Jonesville, VA 24263	NSWO Radio Pennington Gap, VA	\$ 78.50

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<u>Name of Committee</u>	<u>Payee</u>	<u>Amount</u>
9) Democratic Committee of Clarke County Battleton Drive Berryville, VA 22611	Clark County Courier Berryville, VA 22611	\$180.00
10) Democratic Committee of Amelia County Route 4, Box 136 Amelia, VA 23002	Amelia Bulletin Monitor Amelia Courthouse, VA 22302	\$229.85
11) Democratic City Committee of Hopewell 3408 Vinton Street Hopewell, VA 23860	Progress-Index 15 Franklin Petersburg, VA	\$ 83.16
12) Democratic Committee of Rappahannock County Washington, VA 22747	Fauquier Times Democrat Co. P.O. Box 631 Arlington, VA 22186	\$ 94.60
13) Democratic County Committee of Lee County P.O. Box 404 Jonesville, VA 24263	WSWO Radio Pennington Gap, VA	\$ 78.50

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Ms. Betty Ann Saunders, Chairman  
The Democratic County Committee  
of Roanoke County, Virginia  
5134 Remington Road, S.W.  
Roanoke, Virginia 24014

5

Dear Ms. Saunders:

On December 31, 1980, the Commission notified you of a complaint alleging that your committee had violated certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission, on \_\_\_\_\_, 1980, determined that on the basis of the information in the complaint and information provided by your committee, there is no reason to believe that a violation of any statute within its jurisdiction has been committed. Accordingly, the Commission closed its file in this matter. This matter will become a part of the public record within 30 days.

Sincerely,

Charles N. Steele  
General Counsel

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Watkins Elleson, III, Chairman  
The Democratic County Committee  
of Orange County, Virginia  
P.O. Box 1080  
Orange, Virginia 22960

Dear Mr. Elleson:

On December 31, 1980, the Commission notified you of a complaint alleging that your committee had violated certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission, on \_\_\_\_\_, 1980, determined that on the basis of the information in the complaint and information provided by your committee, there is no reason to believe that a violation of any statute within its jurisdiction has been committed. Accordingly, the Commission closed its file in this matter. This matter will become a part of the public record within 30 days.

Sincerely,

Charles N. Steele  
General Counsel

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

35

Lawrence White, Chairman  
The Democratic County Committee  
of Clarke County, Virginia  
Battleton Drive  
Berryville, Virginia 22611

Re: MUR 1328

Dear Mr. White:

On \_\_\_\_\_, 198\_\_\_\_, the Commission found reason to believe that your committee had violated 2 U.S.C. § 441d, a provision of the Federal Election Campaign Act of 1971, as amended (the "Act") in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The Commission reminds you that the failure to state that the advertisement in question was not authorized by the Carter/Mondale Committee nevertheless appears to be in violation of 2 U.S.C. § 441d and you should take immediate steps to insure that this activity does not occur in the future.

If you have any questions, please direct them to William Taylor, at 202-523-4529.

Sincerely,

Charles N. Steele  
General Counsel

32040330244

✓



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

A. H. Keyesen, Chairman  
The Democratic County Committee  
of Rappahannock County, Virginia  
Washington, Virginia 22747

Re: MUR 1328

Dear Mr. Keyesen:

On \_\_\_\_\_, 198\_\_\_\_, the Commission found reason to believe that your committee had violated 2 U.S.C. § 441d, a provision of the Federal Election Campaign Act of 1971, as amended (the "Act") in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The Commission reminds you that the failure to state that the advertisement in question was not authorized by the Carter/Mondale Committee nevertheless appears to be in violation of 2 U.S.C. § 441d and you should take immediate steps to insure that this activity does not occur in the future.

If you have any questions, please direct them to William Taylor, at 202-523-4529.

Sincerely,

Charles N. Steele  
General Counsel

92040330245

VI



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Juan Whittington, Chairman  
The Democratic County Committee  
of Amelia County, Virginia  
Route 4, Box 136  
Amelia, Virginia 23002

Re: MUR 1328

Dear Mr. Whittington:

On \_\_\_\_\_, 198\_\_\_\_, the Commission found reason to believe that your committee had violated 2 U.S.C. § 441d, a provision of the Federal Election Campaign Act of 1971, as amended (the "Act") in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The Commission reminds you that the failure to state that the advertisement in question was not authorized by the Carter/Mondale Committee nevertheless appears to be in violation of 2 U.S.C. § 441d and you should take immediate steps to insure that this activity does not occur in the future.

If you have any questions, please direct them to William Taylor, at 202-523-4529.

Sincerely,

Charles N. Steele  
General Counsel

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Ms. Constance Dudley, Chairman  
The Democratic County Committee  
of Greene County, Virginia  
Route 1, Box 221K  
Standardsville, Virginia 22973

Re: MUR 1328

Dear Ms. Dudley:

On \_\_\_\_\_, 198\_\_\_\_, the Commission found reason to believe that your committee had violated 2 U.S.C. § 441d, a provision of the Federal Election Campaign Act of 1971, as amended (the "Act") in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The Commission reminds you that the failure to state that the advertisement in question was not authorized by the Carter/Mondale Committee nevertheless appears to be in violation of 2 U.S.C. § 441d and you should take immediate steps to insure that this activity does not occur in the future.

If you have any questions, please direct them to William Taylor, at 202-523-4529.

Sincerely,

Charles N. Steele  
General Counsel

82040330247

TT



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. C. F. Hicks, Chairman  
The Democratic County Committee  
of Gloucester County, Virginia  
Gloucester, Virginia 23061

Re: MUR 1328

Dear Mr. Hicks:

On , 198 , the Commission found reason to believe that your committee had violated 2 U.S.C. § 441d, a provision of the Federal Election Campaign Act of 1971, as amended (the "Act") in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The Commission reminds you that the failure to state that the advertisement in question was not authorized by the Carter/Mondale Committee nevertheless appears to be in violation of 2 U.S.C. § 441d and you should take immediate steps to insure that this activity does not occur in the future.

If you have any questions, please direct them to William Taylor, at 202-523-4529.

Sincerely,

Charles N. Steele  
General Counsel

82040330248

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

F. Paul Blanock, Chairman  
The Democratic County Committee  
of Mathews County, Virginia  
Mathews, Virginia 23109

Re: MUR 1328

Dear Mr. Blanock:

On , 198 , the Commission found reason to believe that your committee had violated 2 U.S.C. § 441d, a provision of the Federal Election Campaign Act of 1971, as amended (the "Act") in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The Commission reminds you that the failure to state that the advertisement in question was not authorized by the Carter/Mondale Committee nevertheless appears to be in violation of 2 U.S.C. § 441d and you should take immediate steps to insure that this activity does not occur in the future.

If you have any questions, please direct them to William Taylor, at 202-523-4529.

Sincerely,

Charles N. Steele  
General Counsel

92040330249

VI



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mrs. Nancy Bowles, Chairman  
The Democratic County Committee  
of Goochland County, Virginia  
Kents Store, Virginia 23084

Re: MUR 1328

Dear Mrs. Bowles:

On , 198 , the Commission found reason to believe that your committee had violated 2 U.S.C. § 441d, a provision of the Federal Election Campaign Act of 1971, as amended (the "Act") in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The Commission reminds you that the failure to state that the advertisement in question was not authorized by the Carter/Mondale Committee nevertheless appears to be in violation of 2 U.S.C. § 441d and you should take immediate steps to insure that this activity does not occur in the future.

If you have any questions, please direct them to William Taylor, at 202-523-4529.

Sincerely,

Charles N. Steele  
General Counsel

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. James Edmunds, Chairman  
The Democratic County Committee  
of Lunenburg County, Virginia  
Lunenburg County, Virginia

Re: MUR 1328

Dear Mr. Edmunds:

On , 198 , the Commission found reason to believe that your committee had violated 2 U.S.C. § 44ld, a provision of the Federal Election Campaign Act of 1971, as amended (the "Act") in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The Commission reminds you that the failure to state that the advertisement in question was not authorized by the Carter/Mondale Committee nevertheless appears to be in violation of 2 U.S.C. § 44ld and you should take immediate steps to insure that this activity does not occur in the future.

If you have any questions, please direct them to William Taylor, at 202-523-4529.

Sincerely,

Charles N. Steele  
General Counsel

32040330251

VI



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Ms. Heda Trana, Chairman  
The Democratic County Committee  
of Hopewell County, Virginia  
Hopewell, Virginia 23860

Re: NUR 1328

Dear Ms. Trana:

On \_\_\_\_\_, 198\_\_\_\_, the Commission found reason to believe that your committee had violated 2 U.S.C. § 441d, a provision of the Federal Election Campaign Act of 1971, as amended (the "Act") in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The Commission reminds you that the failure to state that the advertisement in question was not authorized by the Carter/Mondale Committee nevertheless appears to be in violation of 2 U.S.C. § 441d and you should take immediate steps to insure that this activity does not occur in the future.

If you have any questions, please direct them to William Taylor, at 202-523-4529.

Sincerely,

Charles N. Steele  
General Counsel

82040330252

VI



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

10

Mr. Claude D. Carter, Chairman  
The Democratic County Committee  
of Botetourt County, Virginia  
P.O. Box 368  
Daleville, Virginia 24083

Re: MUR 1328

Dear Mr. Carter:

On , 198 , the Commission found reason to believe that your committee had violated 2 U.S.C. § 441d, a provision of the Federal Election Campaign Act of 1971, as amended (the "Act") in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The Commission reminds you that the failure to state that the advertisement in question was not authorized by the Carter/Mondale Committee nevertheless appears to be in violation of 2 U.S.C. § 441d and you should take immediate steps to insure that this activity does not occur in the future.

If you have any questions, please direct them to William Taylor, at 202-523-4529.

Sincerely,

Charles N. Steele  
General Counsel

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. F. E. Marsh, Chairman  
The Democratic County Committee  
of Henry County, Virginia  
Main Street  
Basset, Virginia 24055

Re: MUR 1328

Dear Mr. Marsh:

On , 198 , the Commission found reason to believe that your committee had violated 2 U.S.C. § 441d, a provision of the Federal Election Campaign Act of 1971, as amended (the "Act") in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The Commission reminds you that the failure to state that the advertisement in question was not authorized by the Carter/Mondale Committee nevertheless appears to be in violation of 2 U.S.C. § 441d and you should take immediate steps to insure that this activity does not occur in the future.

If you have any questions, please direct them to William Taylor, at 202-523-4529.

Sincerely,

Charles N. Steele  
General Counsel

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V



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Ms. Virginia Hall, Chairman  
The Democratic City Committee  
of Martinsville, Virginia  
1605 Mulberry Road  
Martinsville, Virginia 24112

Re: MUR 1328

Dear Ms. Hall:

On , 198 , the Commission found reason to believe that your committee had violated 2 U.S.C. § 441d, a provision of the Federal Election Campaign Act of 1971, as amended (the "Act") in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The Commission reminds you that the failure to state that the advertisement in question was not authorized by the Carter/Mondale Committee nevertheless appears to be in violation of 2 U.S.C. § 441d and you should take immediate steps to insure that this activity does not occur in the future.

If you have any questions, please direct them to William Taylor, at 202-523-4529.

Sincerely,

Charles N. Steele  
General Counsel

82040330255

VI



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Claude A. Stokes, Jr., Chairman  
The Democratic County Committee  
of Warren County, Virginia  
1016 Virginia Avenue  
Front Royal, Virginia 22630

Re: MUR 1328

Dear Mr. Stokes:

On , 198 , the Commission found reason to believe that your committee had violated 2 U.S.C. § 441d, a provision of the Federal Election Campaign Act of 1971, as amended (the "Act") in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The Commission reminds you that the failure to state that the advertisement in question was not authorized by the Carter/Mondale Committee nevertheless appears to be in violation of 2 U.S.C. § 441d and you should take immediate steps to insure that this activity does not occur in the future.

If you have any questions, please direct them to William Taylor, at 202-523-4529.

Sincerely,

Charles N. Steele  
General Counsel

32040330256

V1



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Dr. Van B. McCarter, Chairman  
The Democratic City Committee  
of Galax, Virginia  
212 West Center Street  
Galax, Virginia 24333

Re: MUR 1328

Dear Dr. McCarter:

On , 198 , the Commission found reason to believe that your committee had violated 2 U.S.C. § 441d, a provision of the Federal Election Campaign Act of 1971, as amended (the "Act") in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The Commission reminds you that the failure to state that the advertisement in question was not authorized by the Carter/Mondale Committee nevertheless appears to be in violation of 2 U.S.C. § 441d and you should take immediate steps to insure that this activity does not occur in the future.

If you have any questions, please direct them to William Taylor, at 202-523-4529.

Sincerely,

Charles N. Steele  
General Counsel

82040330257



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Kenneth Broon, Chairman  
The Democratic County Committee  
of Grayson County, Virginia  
Route 1, Box 45  
Fnes, Virginia 24330

Re: MUR 1328

Dear Mr. Broon:

On , 198 , the Commission found reason to believe that your committee had violated 2 U.S.C. § 441d, a provision of the Federal Election Campaign Act of 1971, as amended (the "Act") in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The Commission reminds you that the failure to state that the advertisement in question was not authorized by the Carter/Mondale Committee nevertheless appears to be in violation of 2 U.S.C. § 441d and you should take immediate steps to insure that this activity does not occur in the future.

If you have any questions, please direct them to William Taylor, at 202-523-4529.

Sincerely,

Charles N. Steele  
General Counsel

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Paul Harris, Chairman  
The Democratic County Committee  
of Lee County, Virginia  
P.O. Box 404  
Jonesville, Virginia 24263

Re: MUR 1358

Dear Mr. Harris:

On ~~198~~, the Commission found reason to believe that your committee had violated 2 U.S.C. § 441d, a provision of the Federal Election Campaign Act of 1971, as amended (the "Act") in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The Commission reminds you that the failure to state that the advertisement in question was not authorized by the Carter/Mondale Committee nevertheless appears to be in violation of 2 U.S.C. § 441d and you should take immediate steps to insure that this activity does not occur in the future.

If you have any questions, please direct them to William Taylor, at 202-523-4529.

Sincerely,

Charles N. Steele  
General Counsel

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

J. Curtis Herge, Esq.  
Sedan and Herge  
7600 Old Springhouse Road  
McLean, Virginia 22102

Re: MURs 1328 and 1358

Dear Mr. Herge:

On \_\_\_\_\_, 1981, the Commission found reason to believe that the following Virginia Democratic committees --

- a) the Democratic County Committee of Rappahannock County;
- b) the Democratic County Committee of Amelia County;
- c) the Democratic County Committee of Clarke County;
- d) the Democratic County Committee of Greene County;
- e) the Democratic County Committee of Gloucester County;
- f) the Democratic County Committee of Mathews County;
- g) the Democratic County Committee of Goochland County;
- h) the Democratic County Committee of Lunenburg County;
- i) the Democratic City Committee of Hopewell;
- j) the Democratic County Committee of Botetourt County;
- k) the Democratic County Committee of Henry County;
- l) the Democratic City Committee of Martinsville;
- m) the Democratic County Committee of Warren County;
- n) the Democratic City Committee of Galax;
- o) the Democratic County Committee of Grayson County; and
- p) the Democratic County Committee of Lee County, Virginia

violated 2 U.S.C. § 441d, a provision of the Federal Election Campaign Act of 1971, as amended (the Act) in connection with the above referenced MURs. Nevertheless, after considering the circumstances of this matter, the Commission has determined to take no further action. In addition, the Commission has found no reason to believe that the Democratic County Committee of Roanoke County, Virginia and the Democratic County Committee of Orange County, Virginia violated the Act. Moreover, the Commission has decided to close its file in this matter.

If you have any questions, please call William Taylor, the attorney assigned to this matter, at 202-523-4529.

Sincerely,

Charles N. Steele  
General Counsel

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**DEMOCRATIC  
NATIONAL COMMITTEE**

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1625 Massachusetts Ave., N.W. Washington, D.C. 20036

March 26, 1981

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

We are submitting a clarification of an agreement dated March 10, 1981 between the Democratic National Committee and Mr. Larry Framme, the attorney for the respondents (sixteen local Virginia Democratic Committees).

The agreement was meant to be a ratification of the actions of the sixteen local Democratic Committees and the committees were acting as designated agents of the Democratic National Committee for purposes of making expenditures pursuant to 2 U.S.C. § 441a(d)(2) as specified in the agreement.

Sincerely,

*Pat Whiteaker*

Patricia Whiteaker  
Controller

82040330261

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RECEIVED  
GENERAL COUNSEL  
FEB 27 1981

DEMOCRATIC

NATIONAL COMMITTEE

1625 Massachusetts Ave., N.W.  
Washington, D.C. 20036

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

ATTN: WILLIAM TAYLOR

100-52

RECEIVED  
GCC #4642  
8/10/81 12:04

DAVID A. BOWERS  
Attorney at Law  
404 SHENANDOAH BUILDING  
ROANOKE, VIRGINIA 24011

TELEPHONE (703)  
248-4022  
248-1420

May 6, 1981

31 MAY 8 11:07

GENERAL COUNSEL

Charles N. Steele, General Counsel  
Federal Election Commission  
Washington, D. C. 20463

RE: Prentiss Webb, Treasurer  
Roanoke City Democratic Committee  
MUR 1328

Dear Mr. Steele:

Please be advised that I am legal counsel for the Roanoke City Democratic Committee, of Roanoke, Virginia. Our Party treasurer, Mr. Prentiss Webb, was named in a complaint brought by the Republican Party of Virginia on or about December 10, 1980.

Mr. Webb received your letter of April 9, 1981, but because of some confusion we were not able to respond earlier than today. Therefore, I am not sure whether this is a timely response to your notice, but I hope that that technicality will be overlooked. At this point in time I will have Mr. Webb inform you directly, by letter, that I shall be legal counsel for him in this matter. Additionally, I would request that we have a further opportunity to investigate the complaint, and to respond more appropriately at a later time.

Sincerely,

*David A. Bowers*  
David A. Bowers

DAB/rl

cc: Prentiss Webb

82040330263

DAVID A. BOWERS  
Attorney at Law  
4 SHENANDOAH BUILDING  
ROANOKE, VIRGINIA 24011

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ZIP CODE



Charles N. Steele, General Counsel  
Federal Election Commission  
Washington, D. C. 20463

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**McGUIRE, WOODS & BATTLE**

ROSS BUILDING

**RICHMOND, VIRGINIA 23219**

TELEPHONE (804) 644-4131

CABLE MCWOBAT

TELEX 82-7414

**April 9, 1981**

COURT SQUARE BUILDING  
CHARLOTTESVILLE, VIRGINIA 22902  
TELEPHONE (804) 977-2800

137 YORK STREET  
WILLIAMSBURG, VIRGINIA 23185  
TELEPHONE (804) 224-2393

VIRGINIA NATIONAL BANK BUILDING  
NORFOLK, VIRGINIA 23510  
TELEPHONE (804) 827-7677

Federal Election Commission  
1325 K Street, N.W.  
Washington, D. C. 20463

Attn: William Taylor, Esquire

Re: MUR 1328

Dear Mr. Taylor:

Enclosed is the authorization form from Lee County and the acknowledgment.

Very truly yours,

McGUIRE, WOODS & BATTLE

  
Lawrence H. Franke, III

LHF, III/cfr

Enclosures

32040330265

APR 13 4:17

RECEIVED  
GENERAL

To: Federal Election Commission  
Washington, D. C.  
Attn: William Taylor, Esquire

Re: MUR-1328

Dear Mr. Taylor,

I have read the response filed in behalf of  
the Lee County Democratic Committee and  
the facts stated therein are true to the best of  
my knowledge.

Jack Smith  
Chairman

Lee County Democratic  
Committee

82040330266

To: Federal Election Commission  
Washington, D. C.  
Attn: William Taylor, Esquire

Re: MUR-1328

Dear Mr. Taylor,

Lawrence H. Framme, III is authorized to represent the Lee County Democratic Committee in connection with the above-named complaint.

Jack Smith  
Chairman

Lee County Democratic  
Committee

82040330267

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Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

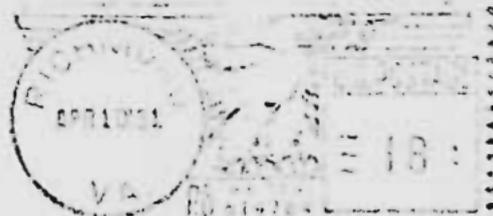
Attn: William Taylor, Esquire

L. H. Framme, III

McGUIRE, WOODS & BATTLE

ROSS BUILDING

RICHMOND, VIRGINIA 23219



Federal Election Commission  
1325 K Street, N.W.  
Washington, D. C. 20463

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**DEMOCRATIC  
NATIONAL COMMITTEE**

1625 Massachusetts Ave., N.W. Washington, D.C. 20036 (202) 297-5200

March 10, 1981

Mr. Lawrence H. Framme, III  
1400 Ross Building  
Richmond, VA 23219

Dear Mr. Framme:

This letter authorizes the Committees set forth as attached to make expenditures in the State of Virginia as duly authorized agents of the Democratic National Committee (DNC), for the purpose and subject to the conditions specified herein.

The Committees are authorized to make expenditures, limited and outlined as attached, for the purpose of influencing the election of Jimmy Carter and Walter Mondale on November 4, 1980, subject to the following terms and conditions:

1. The Committees agree to comply fully with the applicable provisions of the Federal Election Campaign Act of 1971, as amended (2 U.S.C. § et seq.) the "Act", and with any other applicable provision of State and Federal law.

2. The Committees shall supply the DNC with an itemized account of all expenditures made by the Committees pursuant to this agreement, as required under section 302(c) of the Act (2 U.S.C. § 432(c)). Each account shall provide the name and address of every person to whom any such expenditure was made, the date and amount thereof, and the purpose for which such expenditure was made, including a receipt, invoice, or cancelled check.

Any amount expended by the Committees pursuant to this agreement shall be deemed to have been expended by the DNC, shall be applied against the expenditure limit for the national committee of a political party specified in section 315(d)(2) of the Act (2 U.S.C. § 441a(d)(2)).

This agency agreement shall automatically and immediately terminate if the Committees fail to comply with any term or condition in this agreement, and shall otherwise be terminable by the DNC at will upon written notification thereof to the Treasurer or Chairperson of the Committee.

1 MAR 19 11:47

82040330270

As attorney for the Committees, please date and sign both copies of this letter; retain one copy; and return the other copy to the Democratic National Committee, 1625 Massachusetts Avenue, N.W., Washington, D.C. 20036, Attention: Patricia Whiteaker.

Sincerely,

*Charles E. Curry*  
Charles E. Curry  
Treasurer

I have read this agency agreement, and by my signature below, the Committees fully accept and agree to abide by the terms and conditions of this agreement.

Date: 3/16/81

Names of Committees:

- Democratic County of Grayson County
- Democratic City Committee of Galax
- Democratic County Committee of Lunenburg Couty
- Democratic County Committee of Goochland County
- Democratic City of Martinsville
- Democratic County Committee of Henry County
- Democratic County Committee of Greene County
- Democratic County Committee of Warren County
- Democratic County Committee of Botetourt County
- Democratic County Committee of Mathews County
- Democratic County Committee of Gloucester County
- Democratic Committee of Clarke County
- Democratic Committee of Amelia County
- Democratic City Committee of Hopewille
- Democratic Committee of Rappahannock County
- Democratic County Committee of Lee County

BY *P. D. [Signature]* *Attorney for the above*  
Name Title  
*named committees*

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ATTACHMENT

<u>Name of Committee</u>	<u>Payee</u>	<u>Agreed Amount</u>
1) Democratic County Committee of Grayson County Route 1, Box 45 Fries, VA 24330 - and - Democratic City Committee of Galax 212 West Center Street Galax, VA 24333	The Gazette Galax, VA	\$125.00
2) Democratic County Committee of Lunenburg County Kenbridge, VA 23860	Kenbridge-Victoria Dispatch Kenbridge, VA	\$126.00
3) Democratic County Committee of Goochland County Kents Store, VA 23084	Goochland Gazette Goochland, VA	\$123.48
4) Democratic City Committee of Martinsville 1605 Mulberry Road Martinsville, VA 24112 -and - Democratic County Committee of Henry County Basset, VA 24055	Martinsville Bulletin Martinsville, VA	\$100.00
5) Democratic County Committee of Greene County Route 1, Box 221K Standardsville, VA 22973	Greene County Record Standardsville, VA 22973	\$ 86.24
6) Democratic County Committee of Warren County 1016 Virginia Avenue Front Royal, VA 22630	Warren Sentinel Front Royal, VA 22630	\$ 86.00
7) Democratic County Committee of Botetourt County P.O. Box 368 Daleville, VA 24083	Fincastle Herald Fincastle, VA	\$ 98.00
8) Democratic County Committee of Mathews County Mathews, VA 23109 - and - Democratic County Committee of Gloucester County Gloucester, VA 23-61	Gloucester Mathews Gazette Journal Gloucester, VA	\$195.00

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<u>Name of Committee</u>	<u>Payee</u>	<u>Amount Paid</u>
9) Democratic Committee of Clarke County Battleton Drive Berryville, VA 22611	Clark County Courier Berryville, VA 22611	\$180.00
10) Democratic Committee of Amelia County Route 4, Box 136 Amelia, VA 23002	Amelia Bulletin Monitor Amelia Courthouse, VA 22302	\$229.85
11) Democratic City Committee of Hopewell 3408 Vinton Street Hopewell, VA 23860	Progress-Index 15 Franklin Petersburg, VA	\$ 83.16
12) Democratic Committee of Rappahannock County Washington, VA 22747	Fauquier Times Democrat Co. P.O. Box 631 Arlington, VA 22186	\$ 94.60
13) Democratic County Committee of Lee County P.O. Box 404 Jonesville, VA 24263	WSND Radio Pennington Gap, VA	\$ 78.50

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DEMOCRATIC  
NATIONAL COMMITTEE  
1625 Massachusetts Ave., N.W.  
Washington, D.C. 20036

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WILLIAM TAYLOR  
Federal Election Commission

CCC 41189

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RECEIVED MAR 14 1981

**DEMOCRATIC  
NATIONAL COMMITTEE**

1625 Massachusetts Ave., N.W. Washington, D.C. 20036 (202) 797-3000

March 10, 1981

Mr. Lawrence H. Framme, III  
1400 Ross Building  
Richmond, VA 23219

Dear Mr. Framme:

This letter authorizes the Committees set forth as attached to make expenditures in the State of Virginia as duly authorized agents of the Democratic National Committee (DNC), for the purpose and subject to the conditions specified herein.

The Committees are authorized to make expenditures, limited and outlined as attached, for the purpose of influencing the election of Jimmy Carter and Walter Mondale on November 4, 1980, subject to the following terms and conditions:

1. The Committees agree to comply fully with the applicable provisions of the Federal Election Campaign Act of 1971, as amended (2 U.S.C. § et seq.) the "Act", and with any other applicable provision of State and Federal law.

2. The Committees shall supply the DNC with an itemized account of all expenditures made by the Committees pursuant to this agreement, as required under section 302(c) of the Act (2 U.S.C. § 432(c)). Each account shall provide the name and address of every person to whom any such expenditure was made, the date and amount thereof, and the purpose for which such expenditure was made, including a receipt, invoice, or cancelled check.

Any amount expended by the Committees pursuant to this agreement shall be deemed to have been expended by the DNC, shall be applied against the expenditure limit for the national committee of a political party specified in section 315(d)(2) of the Act (2 U.S.C. § 441a(d)(2)).

This agency agreement shall automatically and immediately terminate if the Committees fail to comply with any term or condition in this agreement, and shall otherwise be terminable by the DNC at will upon written notification thereof to the Treasurer or Chairperson of the Committee.

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COM

As attorney for the Committees, please date and sign both copies of this letter; retain one copy; and return the other copy to the Democratic National Committee, 1625 Massachusetts Avenue, N.W., Washington, D.C. 20036, Attention: Patricia Whiteaker.

Sincerely,

*Charles E. Curry*  
Charles E. Curry  
Treasurer

I have read this agency agreement, and by my signature below, the Committees fully accept and agree to abide by the terms and conditions of this agreement.

Date: \_\_\_\_\_

Names of Committees:

- Democratic County of Grayson County
- Democratic City Committee of Galax
- Democratic County Committee of Lunenburg Couty
- Democratic County Committee of Goochland County
- Democratic City of Martinsville
- Democratic County Committee of Henry County
- Democratic County Committee of Greene County
- Democratic County Committee of Warren County
- Democratic County Committee of Botetourt County
- Democratic County Committee of Mathews County
- Democratic County Committee of Gloucester Countv
- Democratic Committee of Clarke County
- Democratic Committee of Amelia County
- Democratic City Committee of Hopewille
- Democratic Committee of Rappahannock County
- Democratic County Committee of Lee County

BY \_\_\_\_\_, \_\_\_\_\_  
Name Title

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ATTACHMENT

<u>Name of Committee</u>	<u>Payee</u>	<u>Agreed Amount</u>
1) Democratic County Committee of Grayson County Route 1, Box 45 Fries, VA 24330 - and - Democratic City Committee of Galax 212 West Center Street Galax, VA 24333	The Gazette Galax, VA	\$125.00
2) Democratic County Committee of Lunenburg County Kenbridge, VA 23860	Kenbridge-Victoria Dispatch Kenbridge, VA	\$126.00
3) Democratic County Committee of Goochland County Kents Store, VA 23084	Goochland Gazette Goochland, VA	\$123.48
4) Democratic City Committee of Martinsville 1605 Mulberry Road Martinsville, VA 24112 -and - Democratic County Committee of Henry County Basset, VA 24055	Martinsville Bulletin Martinsville, VA	\$100.00
5) Democratic County Committee of Greene County Route 1, Box 221K Standardsville, VA 22973	Greene County Record Standardsville, VA 22973	\$ 86.24
6) Democratic County Committee of Warren County 1016 Virginia Avenue Front Royal, VA 22630	Warren Sentinel Front Royal, VA 22630	\$ 86.00
7) Democratic County Committee of Botetourt County P.O. Box 368 Daleville, VA 24083	Fincastle Herald Fincastle, VA	\$ 98.00
8) Democratic County Committee of Mathews County Mathews, VA 23109 - and - Democratic County Committee of Gloucester County Gloucester, VA 23-61	Gloucester Mathews Gazette Journal Gloucester, VA	\$195.00

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<u>Name of Committee</u>	<u>Payee</u>	<u>Amount</u>
9) Democratic Committee of Clark County Battleton Drive Berryville, VA 22611	Clark County Courier Berryville, VA 22611	\$180.00
10) Democratic Committee of Amelia County Route 4, Box 136 Amelia, VA 23002	Amelia Bulletin Monitor Amelia Courthouse, VA 22302	\$229.85
11) Democratic City Committee of Hopewell 3408 Vinton Street Hopewell, VA 23860	Progress-Index 15 Franklin Petersburg, VA	\$ 83.16
12) Democratic Committee of Rappahannock County Washington, VA 22747	Fauquier Times Democrat Co. P.O. Box 631 Arlington, VA 22186	\$ 94.60
15) Democratic County Committee of Lee County P.O. Box 404 Jonesville, VA 24263	WSNO Radio Perrington Gap, VA	\$ 78.50

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DEMOCRATIC

NATIONAL COMMITTEE

1625 Massachusetts Ave., N.W.

Washington, D.C. 20036

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Mr. William Taylor  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20005

1400 Ross Building  
Richmond, Virginia 23219

March 10, 1981

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41 MAR 12 AIO: 36

GENERAL COUNSEL

Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

Attn: William Taylor, Esquire

Re: MUR 1358 (80)

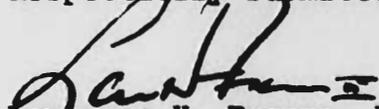
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Dear Mr. Taylor:

This response is filed on behalf of the Lee County Democratic Committee in connection with the above-numbered complaint. Please reference our earlier response dated January 20, 1981 filed on behalf of several other Virginia Democratic committees.

The Lee County Democratic Committee authorized non-advertisements advocating the election of Jimmy Carter as President to be aired on WSWV Radio, Pennington Gap, Virginia. At the time the Lee County Democratic Committee believed they were authorized to do so on behalf of the Democratic National Committee. A agency agreement is being executed by the Democratic National Committee acknowledging the actions of the Lee County Committee and agreeing to report its expenditure in the amount of \$78.50 to the Federal Election Commission in its next report. Because of this, the Lee County Democratic Committee does not believe that it violated the Federal Election Campaign Act and, therefore, respectfully requests the Commission to dismiss the complaint against it.

Respectfully submitted,

  
Lawrence H. Framme, III

LHF,III/cfr

P. S. An acknowledgment and a representation authorization will be forwarded directly to you from the Lee County Democratic Committee Chairman.

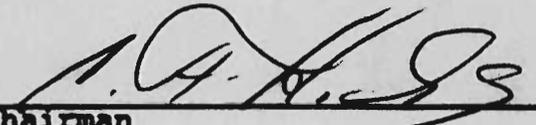
FEB 9 9:49

To: Federal Election Commission  
Washington, D. C.  
Attn: William Taylor, Esquire

Re: MUR-1328

Dear Mr. Taylor,

I have read the response filed in behalf of  
the Gloucester Democratic Committee and  
the facts stated therein are true to the best of  
my knowledge.

  
Chairman

Gloucester Democratic  
Committee

State of Virginia

County of Gloucester, to-wit:

The foregoing instrument was acknowledged  
before me this 2nd day of February, 1981.

Betty Ann Burgess, Notary Public  
My comm. expires: March 27, 1982.

82040330281

90:21d 6 1981

RECEIVED  
FEB 11 1981

Democratic National Committee under authority of Section 441a (d). The Democratic National Committee has not yet responded to this request, but the Committee expects it to act favorably on its request and to report this expenditure in its next report to the Commission. The Greene County Democratic Committee contends that with the reporting by the Democratic National Committee there will be no violation of the Federal Election Campaign Act and, therefore, asks the Commission to dismiss the Complaint against it.

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3. Orange County Democratic Committee, H. Watkins Ellerson, III, Chairman. The Addendum to the Complaint filed by the Virginia Republican Party did not contain a copy of any advertisement placed by the Orange County Democratic Committee. The Orange County Democratic Committee did not authorize the placement of any newspaper advertising advocating the election of a presidential candidate in the 1980 election. The Orange County Democratic Committee is aware that an advertisement advocating the re-election of President Carter and Walter Mondale was placed by two individual members of the Committee and paid for with their own funds. To the best of the knowledge of the Orange County Democratic Committee that advertisement was placed by the Committee members as individuals and was not placed in consultation with, at the expense of or with the authorization of the Orange County Democratic Committee. Also, to the best of the Committee's knowledge, the advertisement was not placed at the direction of or in consultation with the Carter/Mondale Presidential Campaign.

Based on the facts set forth above, the Orange County Democratic Committee does not believe that it violated the Federal Election Campaign Act of 1971 and, therefore, asks the Commission to dismiss the Complaint against it.

4. Gloucester County Democratic Committee, C. F. Hicks, Chairman, and Mathews County Democratic Committee, F. Paul Blanock, Chairman. The advertisement attached as Exhibit F to the Addendum to the Complaint of the Virginia Republican Party was placed and paid for by the Gloucester County Democratic Committee and the

Mathews County Democratic Committee. The cost of the advertisement was \$195.00. At the time the advertisement was placed and at this time the Gloucester and Mathews County Democratic Committees believe that they were authorized to place the advertisement as agents of the Democratic National Committee pursuant to the Democratic National Committee's authority to place such advertisements under Section 441a (d) of the Federal Election Campaign Act. Immediately before placing the advertisement, the Chairman of the Gloucester County Democratic Committee was advised that the Democratic National Committee had authorized the placement of the advertisement. At this time a request has been made to the Democratic National Committee to report the expenditure in its next report to the Federal Election Commission. While a formal response to this request has not yet been received from the Democratic National Committee, the Gloucester and Mathews Democratic Committees believe that a favorable response will be received. For this reason, the Gloucester and Mathews County Democratic Committees believe that they did not violate the Federal Election Campaign Act of 1971 and, therefore, ask the Commission to dismiss the complaint against them. It should be noted that the disclaimer on the advertisement does state that it was paid for by the Democratic National Committee in addition to other sources.

- 8 2 0 4 0 3 3 0 2 8 3
5. Goochland County Democratic Committee, Nancy Bowles, Chairman. The advertisement attached as Exhibit G to the Addendum to the Complaint of the Virginia Republican Party was placed by the Goochland County Democratic Committee and paid for by that Committee. The cost of the advertisement was \$123.48. The circumstances surrounding the placement of the advertisement are similar to those of the advertisement placed by the Greene County Democratic Committee. The Goochland County Democratic Committee has customarily and routinely placed advertisements advocating the election of Democratic candidates in its local newspaper shortly before each election. At the time that the advertisement was placed, the officers of the Goochland County Democratic Committee were unaware of those portions of the Federal Election Campaign Act prohibiting local committees from placing advertisements

1400 ROSS BUILDING  
RICHMOND, VIRGINIA 23219

January 20, 1981

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

MUR 1328

Gentlemen:

8 2 0 4 0 3 3 0 2 0 4

This response to the above-named Complaint is filed on behalf of all local Democratic Committees named in the Addendum to Complaint filed by the Virginia Republican Party with the Commission on December 15, 1980. Documents authorizing me to represent the Green, Goochland, Lunenburg, Botetourt, Henry, Warren and Galax committees are enclosed. Similar documents from the Orange and Gloucester committees have already been sent directly to you. Documents from the Roanoke, Mathews, Hopewell, Martinsville and Grayson committees are being sent directly to you. All of these committees deny they have violated the Federal Election Campaign Act of 1971, but state that if a technical violation did occur, such was inadvertent and unintentional and in no way prejudiced any candidate.

Following a response containing points common to all committees complained of, individual committee responses will be set forth in the same order that they appear in the Complaint.

Matters Common To All Of The Committees Complained Of

Several points are common to all of the committees complained of by the Republican Party. With the exception of the advertisement placed by the Hopewell City Democratic Committee in the Petersburg Progress Index, all advertisements were placed in local, rural newspapers of very limited circulation. None of these newspapers were of daily circulation. While the Petersburg Progress Index has a daily circulation, its circulation is limited to the area of Petersburg, Virginia and the immediately surrounding counties. There was no

intent on the part of any committee to violate the Act. In those instances set forth below where committees made inquiries about their ability to advertise, they were unfortunately given incorrect information by persons in the Virginia Carter/Mondale Campaign.

Those committees who placed ads are seeking to cure any possible technical violation of the Act by requesting the Democratic Carter/Mondale Committee to authorize their expenditures under Section 441a (d) of the Federal Election Campaign Act. Certainly, the limited nature of the ads, their limited circulation and the outcome of the election in Virginia (Mr. Reagan carried Virginia by 237,435 votes), demonstrates that there was no prejudice to any candidate by the placement of the ads.

Individual Responses

1. Roanoke County Democratic Committee, Betty Ann Saunders, Chairman. The Roanoke County Democratic Committee did not place any newspaper advertisements in connection with the 1980 presidential election. The advertisement listed as Exhibit A in the Complaint bears a disclaimer stating that it was placed on the authority of the Roanoke City Democratic Committee. The Roanoke City Democratic Committee is a different entity than the Roanoke County Democratic Committee. The City of Roanoke is an independent city having its own Democratic committee. The Roanoke County Democratic Committee, therefore, denies that it violated the Federal Election Campaign Act of 1971.
2. Greene County Democratic Committee, Constance Dudley, Chairman. The newspaper advertisement attached to the Complaint as Exhibit C was placed by the Greene County Democratic Committee. Its cost of \$86.24 was paid by the Greene County Democratic Committee. The Greene County Committee, like many Virginia local committees, routinely place advertising advocating the election of Democratic candidates in a local newspaper shortly before elections.

The officers of the Greene County Democratic Committee who placed the advertisement were unaware of that portion of the Federal Election Campaign Act prohibiting local party committees from placing advertisements at their own expense which unambiguously refer to a presidential candidate. The Committee has requested

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unambiguously referring to presidential candidates at their own expense.

The Goochland County Democratic Committee has requested the Democratic National Committee to ratify its expenditure as an agent of the Democratic National Committee and to report the expenditure on the next report to the Federal Election Commission. The Goochland County Democratic Committee expects a favorable response to this request. Based on this, the Goochland County Democratic Committee believes that it did not violate the Federal Election Campaign Act of 1971 and, therefore, asks the Commission to dismiss the complaint against it.

- 8 2 0 4 0 3 3 0 2 8 6
6. Lunenburg County Democratic Committee, James Edmunds, Chairman. The Lunenburg County Democratic Committee did place the advertisement attached as Exhibit H to the Addendum to Complaint filed by the Republican Party of Virginia. Like the Greene and Goochland County Committees, the Lunenburg County Democratic Committee customarily places advertising advocating the election of Democratic candidates shortly before each election. At the time of placing the advertisement attached as Exhibit H, the Lunenburg County Democratic Committee was unaware of those portions of the Federal Election Campaign Act prohibiting local committees from placing such advertisements on their own account in presidential elections. The Lunenburg County Democratic Committee has requested the Democratic National Committee to ratify its expenditure for the advertisement in the amount of \$126.00 as an agency expenditure of the Democratic National Committee and that it be reported accordingly. On the basis of the above, the Lunenburg County Democratic Committee does not believe that it violated the Federal Election Campaign Act of 1971 and, therefore, requests the Commission to dismiss the Complaint against it.
  7. City Democratic Committee of Hopewell, Virginia, Hilda Traina, Chairman. The City Democratic Committee of Hopewell did place the advertisement attached as Exhibit J to the Addendum to Complaint of the Virginia Republican Party. The circumstances surrounding its placement are similar to those of Greene, Goochland and Lunenburg County. The City Democratic Committee of Hopewell customarily and

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routinely places advertisements in its local newspaper advocating election of Democratic candidates before each election. The City Democratic Committee of Hopewell was unaware of the prohibitions of the Federal Election Campaign Act concerning payment for advertising unambiguously referring to presidential candidates on its own account. The City Democratic Committee of Hopewell has requested the Democratic National Committee to ratify its expenditure for the advertisement as an agency expenditure of the Democratic National Committee and that it report it accordingly. The City Democratic Committee of Hopewell anticipates a favorable response by the Democratic National Committee. Based on the above, the City Democratic Committee of Hopewell believes that it did not violate the Federal Election Campaign Act and, therefore, asks the Commission to dismiss the complaint against it.

8. Botetourt County Democratic Committee, Claude D. Carter, Chairman. The Botetourt County Democratic Committee did place the advertisement attached as Exhibit I to the Addendum to Complaint of the Republican Party of Virginia. The advertisement was paid for by that Committee at a cost of \$98.00.

Before running the advertisement, the Chairman of the Botetourt County Democratic Committee inquired of the Virginia State Carter/Mondale Headquarters whether such advertisement by local committees was permissible. The Chairman was advised by someone in the Virginia State Carter/Mondale Headquarters that such advertising was permissible as long as the total cost did not exceed \$1,000.00. At the time the Botetourt County Democratic Committee was unaware of the prohibitions of the Federal Election Campaign Act regarding placement of advertising unambiguously referring to presidential candidates on the account of the local committee. The Botetourt County Democratic Committee has requested the Democratic National Committee to ratify its expenditure as an agency expenditure of the Democratic National Committee and to report it to the Federal Election Commission accordingly. The Botetourt County Democratic Committee believes that the Democratic National Committee will act favorably on its request and for this reason does not believe that it violated the Federal Election Campaign Act. Accordingly, it requests the Commission to dismiss the Complaint against it.

- 8 2 0 4 0 3 3 0 2 0 8
9. The City Democratic Committee of Martinsville, Virginia Hall, Chairman, and Henry County Democratic Committee, F. E. Marsh, Chairman. The Martinsville City Democratic Committee and Henry County Democratic Committee jointly placed the advertisements attached as Exhibits K and L to the Addendum to Complaint of the Republican Party of Virginia. Before placing the advertisements the Chairman of the Martinsville City Democratic Committee inquired of the Virginia State Carter/Mondale Headquarters as to whether such advertisement was permissible. The Chairman was advised by someone at the Headquarters that such advertising was permissible as long as the total cost of the advertising did not exceed \$1,000.00. Based on this advice, the Chairman placed the advertising. At that time neither the Martinsville City Democratic Committee or the Henry County Democratic Committee were aware of the provisions of the Federal Election Campaign Act relating to advertising by a local party committee. The Martinsville City Democratic Committee and the Henry County Democratic Committee have requested the Democratic National Committee to ratify its expenditure of \$100.00 as an agency expenditure of the Democratic National Committee. It expects a favorable response from the Democratic National Committee and that the Democratic National Committee will report the expenditure accordingly. For these reasons the Martinsville City Democratic Committee and the Henry County Democratic Committee believe that they did not violate the Federal Election Campaign Act and, therefore, ask the Commission to dismiss the complaint against them.
10. Warren County Democratic Committee, Claude A. Stokes, Chairman. The Warren County Democratic Committee did place the advertisement attached as Exhibit M to the Addendum to Complaint of the Republican Party of Virginia. Circumstances surrounding the placement of that advertisement are similar to those of Greene, Goochland, Lunenburg and others. The Warren County Democratic Committee routinely and customarily places advertisements advocating the election of Democratic candidates immediately before each election. At the time of the placing of this advertisement, at a cost of \$86.00, the Warren County Democratic Committee was unaware of the provisions of the Federal Election

Campaign Act of 1971 regarding the placement of such advertising by local committees. The Warren County Democratic Committee has now requested the Democratic National Committee to ratify its expenditure as an agency expenditure of the Democratic National Committee and to report it accordingly. It expects a favorable response by the Democratic National Committee. Therefore, the Warren County Democratic National Committee believes that it did not violate the Federal Election Campaign Act and, therefore, asks the Commission to dismiss the Complaint against it.

11. Galax City Democratic Committee, Dr. Van B. McCarter, Chairman, and Grayson County Democratic Committee, Kenneth Broom, Chairman. The Galax City and Grayson County Democratic Committees jointly placed the advertisement attached as Exhibit N to the Addendum to Complaint of the Republican Party of Virginia. The cost of the advertisement, \$125.00, was jointly paid by the two Committees. Before placing the advertisement, the Chairman of the Grayson County Democratic Committee inquired of the Ninth District coordinator for the Carter/Mondale Presidential Campaign as to whether or not a local committee was permitted to place such advertising. He was advised by the coordinator that such advertising was permissible provided the total amount of the advertising did not exceed \$1,000.00. At the time of placing the advertisement neither the Grayson County nor Galax City Democratic Committee were aware of the provisions of the Federal Election Campaign Act governing the placement of advertising by local committees on their own account. The Grayson County and Galax City Democratic Committees have requested the Democratic National Committee to ratify their expenditures as agency expenditures and to report them in its next report to the Federal Election Commission. The Committees expect a favorable response from the Democratic National Committee. For these reasons the Grayson County and Galax City Committees believe that they did not violate the Federal Election Campaign Act and, therefore, ask the Commission to dismiss the Complaint against them.

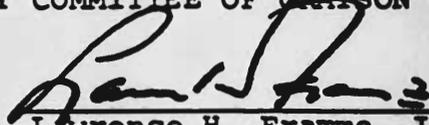
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For the foregoing reasons, the Committees respectfully request the Commission to dismiss the complaints against them.

Because of the number of the Complaints included in the Addendum of the Republican Party and the fact that the committees involved are scattered throughout the state of Virginia, it is not possible to include a sworn statement of each of the committees involved in this response. However, this response does embody the facts recited to counsel by each of the committee chairmen. A copy of this response sworn to by each of the committee chairmen will be forwarded to the Commission directly from each chairman as soon as possible.

THE DEMOCRATIC COUNTY COMMITTEE OF ROANOKE COUNTY  
THE DEMOCRATIC COUNTY COMMITTEE OF GREENE COUNTY  
THE DEMOCRATIC COUNTY COMMITTEE OF ORANGE COUNTY  
THE DEMOCRATIC COUNTY COMMITTEE OF GLOUCESTER COUNTY  
THE DEMOCRATIC COUNTY COMMITTEE OF MATHEWS COUNTY  
THE DEMOCRATIC COUNTY COMMITTEE OF GOOCHLAND COUNTY  
THE DEMOCRATIC COUNTY COMMITTEE OF LUNENBURG COUNTY  
THE DEMOCRATIC CITY COMMITTEE OF HOPEWELL, VIRGINIA  
THE DEMOCRATIC COUNTY COMMITTEE OF BOTETOURT COUNTY  
THE DEMOCRATIC COUNTY COMMITTEE OF HENRY COUNTY  
THE DEMOCRATIC CITY COMMITTEE OF MARTINSVILLE, VIRGINIA  
THE DEMOCRATIC COUNTY COMMITTEE OF WARREN COUNTY  
THE DEMOCRATIC CITY COMMITTEE OF GALAX, VIRGINIA  
THE DEMOCRATIC COUNTY COMMITTEE OF GRAYSON COUNTY

By:

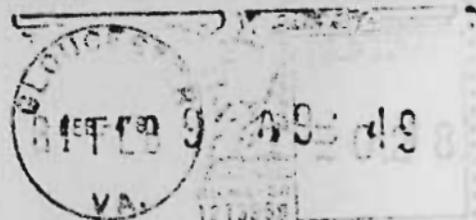
  
Lawrence H. Framme, III  
Counsel

82040330290

MARTIN, HICKS & INGLES, LTD.

ATTORNEYS AND COUNSELLORS AT LAW

GLOUCESTER, VIRGINIA 23061



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Attn: William Taylor, Esquire

Federal Election Commission

Washington

D. C.

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**McGUIRE, WOODS & BATTLE**  
ROSS BUILDING

**RICHMOND, VIRGINIA 22819**

TELEPHONE (804) 644-4131

CABLE MCWOBAT

TELEX 82-7414

COURT SQUARE BUILDING  
CHARLOTTESVILLE, VIRGINIA 22902  
TELEPHONE (804) 977-2500

137 YORK STREET  
WILLIAMSBURG, VIRGINIA 23185  
TELEPHONE (804) 229-2393

VIRGINIA NATIONAL BANK BUILDING  
NORFOLK, VIRGINIA 23510  
TELEPHONE (804) 627-7677

February 4, 1981

Federal Election Commission  
1325 K Street, N.W.  
Washington, D. C. 20463

Attn: William Taylor, Esquire

Re: MUR 1328

Dear Mr. Taylor:

Enclosed is the authorization form from Roanoke County  
and the acknowledge.

Very truly yours,

McGUIRE, WOODS & BATTLE

*Lawrence H. Framme, III*  
Lawrence H. Framme, III

LHF, III/cfr

Encl.

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To: Federal Election Commission  
Washington, D. C.  
Attn: William Taylor, Esquire

Re: MUR-1328

Dear Mr. Taylor,

I have read the response filed in behalf of  
the Polk County Democratic Committee and  
the facts stated therein are true to the best of  
my knowledge.

Doty Ann Janda  
Chairman

Polk County Democratic  
Committee

82040330293

To: Federal Election Commission  
Washington, D. C.  
Attn: William Taylor, Esquire

Re: MUR-1328

Dear Mr. Taylor,

Lawrence H. Framme, III is authorized to represent the Roanoke County Democratic Committee in connection with the above-named complaint.

Betty Ann Sanders  
Chairman

Roanoke County Democratic  
Committee Chairman

82040330294

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McGUIRE, WOODS & BATTLE

ROSS BUILDING

RICHMOND, VIRGINIA 23219



Federal Election Commission  
1325 K Street, N.W.  
Washington, D. C. 20463

Attn: William Taylor, Esquire

913077

3916

81 FEB 5 AM: 44

To: Federal Election Commission  
 Washington, D. C.  
 Attn: William Taylor, Esquire

Re: MUR-1328

Dear Mr. Taylor,

I have read the response filed in behalf of  
 the Martin S. Williams Democratic Committee and  
 the facts stated therein are true to the best of  
 my knowledge.

Virginia Hall  
 Chairman

Martin S. Williams Democratic Exec  
 Committee

2-3-81

Sworn to and subscribed before me this 3rd day of February, 1981

*Ann B. Winn*

Ann B. Winn, Notary Public  
 My commission expires 9/26/83

62040330296

51 FEB 5 PM: 56

RECEIVED  
FEB 5 1981

To: Federal Election Commission  
Washington, D. C.  
Attn: William Taylor, Esquire

Re: MUR-1328

Dear Mr. Taylor,

Lawrence H. Framme, III is authorized to represent the ~~City of Washington~~ Democratic Committee in connection with the above-named complaint.

Virginia Hall  
Chairman

Executive Committee Metinsville Democratic

2-3-81

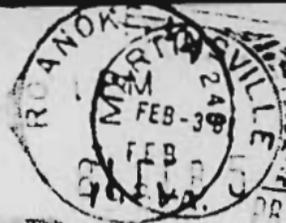
Sworn to and subscribed before me this 3rd day of February, 1981

Ann B. Winn

Ann B. Winn, Notary Public  
My commission expires 9/26/83

32040330297

**MARTINSVILLE BULLETIN**  
MARTINSVILLE, VIRGINIA  
24112



William Taylor, Esquire  
Federal Election Commission  
Washington, D. C. 20463

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911986

To: Federal Election Commission  
 Washington, D. C.  
 Attn: William Taylor, Esquire

Re: MUR-1328

Dear Mr. Taylor,

Lawrence H. Framme, III is authorized to represent the Hapewell Democratic Committee in connection with the above-named complaint.

Hilda Mamen Trauma  
 Chairman

Hapewell Democratic  
 Committee

3408 Vinton Street  
 Hapewell, Virginia  
 23860

82040330299

1 JAN 29 10:46

GENERAL INVESTIGATIVE  
 DIVISION

To: Federal Election Commission  
Washington, D. C.  
Attn: William Taylor, Esquire

Re: MUR-1328

Dear Mr. Taylor,

I have read the response filed in behalf of  
the Hapewell Democratic Committee and  
the facts stated therein are true to the best of  
my knowledge.

Hilda Manieri Trama  
Chairman

Hapewell Democratic  
Committee

3408 Vinton Street  
Hapewell, Virginia 23860

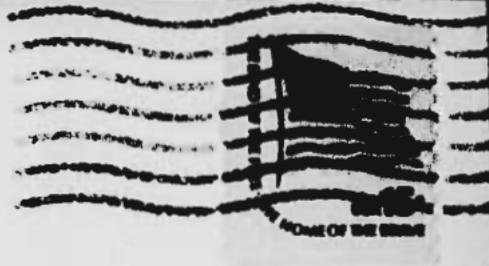
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Hilda M. Traina  
Councilwoman



Federal Election Commission  
% Mr. Taylor  
Washington, D. C. 20463

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81 JAN 28 10:03

To: Federal Election Commission  
Washington, D. C.  
Attn: William Taylor, Esquire

Re: MUR-1328

Dear Mr. Taylor,

Lawrence H. Framme, III is authorized to represent the ~~Grayson County~~ Democratic Committee in connection with the above-named complaint.

  
Chairman

~~Grayson County~~ Democratic  
Committee

82040330302

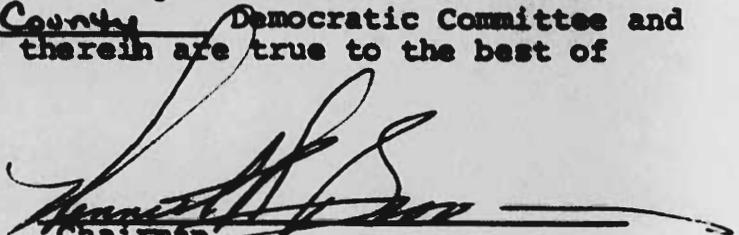
11 JAN 28 10:26

To: Federal Election Commission  
Washington, D. C.  
Attn: William Taylor, Esquire

Re: MUR-1328

Dear Mr. Taylor,

I have read the response filed in behalf of the Grayson County Democratic Committee and the facts stated therein are true to the best of my knowledge.

  
Chairman

Grayson County Democratic  
Committee

State of Virginia

County of Grayson, to wit:

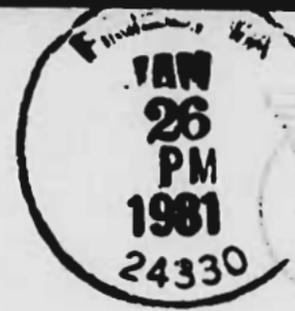
The foregoing instrument was acknowledged before me this 26th day of January, 1981, by Kenneth R. Brooms, Chairman of Grayson County Democratic Committee.

  
Notary Public

My Commission expires January 9, 1983.

82040330303

Grayson County Democratic Party  
Route 1, Box 45  
Fries, Virginia 24330



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William Taylor, Esquire

Federal Election Commission

Washington, D. C. 20463

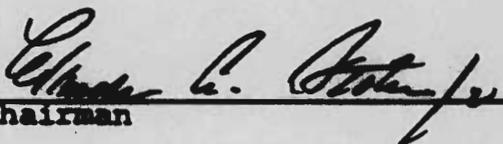
81 JAN 28 1981

To: Federal Election Commission  
Washington, D. C.  
Attn: William Taylor, Esquire

Re: MUR-1328

Dear Mr. Taylor,

I have read the response filed in behalf of the WARREN COUNTY Democratic Committee and the facts stated therein are true to the best of my knowledge.

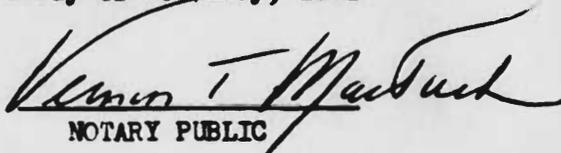
  
Chairman

WARREN COUNTY Democratic  
Committee

STATE OF VIRGINIA  
COUNTY OF WARREN, TO-WIT

I, Vernon T. MacTuck, A Notary Public in and for the State and County aforesaid, do hereby certify that Claude A. Stokes, Jr. whose name is signed above have this day personally appeared and acknowledged same before me in State and County aforesaid.

Given under my hand this 24th day of January, 1981  
My commission expires the 3rd day of February, 1981

  
NOTARY PUBLIC

82040330305

Glaude A. Stokes, Jr.  
1016 Virginia Avenue  
Front Royal, Virginia 22630

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

3 Attn: William Taylor, Esquire



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JAN 26 1981



RECEIVED  
81 JAN 28 9:03

To: Federal Election Commission  
Washington, D. C.  
Attn: William Taylor, Esquire

Re: MUR-1328

Dear Mr. Taylor,

I have read the response filed in behalf of  
the GRAYSON/GRAY Democratic Committee and  
the facts stated therein are true to the best of  
my knowledge.

Van B. McCarter  
Chairman

GRAYSON/GRAY Democratic  
Committee

STATE OF VIRGINIA

To-wit:

COUNTY OF GRAYSON

I, Anna H. Hodges, A Notary Public in the State and County Aforesaid do hereby  
certify that Van B. McCarter personally appeared before me this 26th day of  
January, 1981 and acknowledged the foregoing.

My Commission expires 2/11/81.

Anna H. Hodges  
Anna H. Hodges  
Notary Public

26 10:28 AM 81 JAN 28

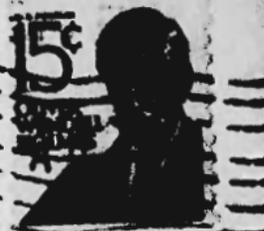
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JAN 28 1981

EXECUTIVE COMMITTEE  
GALAX CITY DEMOCRATIC PARTY

BOX 28

GALAX, VIRGINIA 24333



William Taylor, Esquire  
Federal Election Commissioner  
Washington, D.C. 20463

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REC'D 3816  
81 JAN 26 9:48  
F. PAUL BLANOCK  
ATTORNEY - AT - LAW  
MATHEWS, VIRGINIA 22109

January 22, 1981

AREA CODE 804  
728-2149

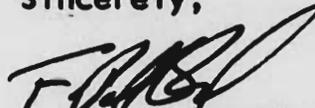
William Taylor, Esquire  
Federal Election Commission  
Washington, D. C. 20463

Dear Mr. Taylor:

32040330309  
Herewith please find my affidavit setting forth that the information contained in the letter mailed to the Commission on January 21, 1981, by Lawrence H. Frame, III, counsel for the various Democratic Committees and letter authorizing Mr. Frame to act on behalf of the Mathews County Democratic Committee.

With kind regards, I am,

Sincerely,

  
F. Paul Blanock

FPB:rh

cc: Lawrence H. Frame, III

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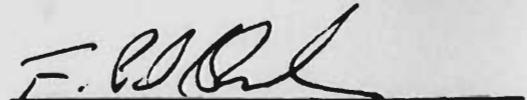
81 JAN 26 48:48

To: Federal Election Commission  
Washington, D. C.  
Attn: William Taylor, Esquire

Re: MUR-1328

Dear Mr. Taylor,

Lawrence H. Framme, III is authorized to represent the Mathews Democratic Committee in connection with the above-named complaint.

  
Chairman

Mathews Democratic  
Committee

82040330310

**F. PAUL BLANOCK**

**ATTORNEY - AT - LAW**

**MATHEWS, VIRGINIA 23109**



William Taylor, Esquire  
Federal Election Commission  
Washington, C. C. 20463

8 2 0 4 0 3 3 0 3 1

To: Federal Election Commission  
Washington, D. C.  
Attn: William Taylor, Esquire  
Re: MUR-1328

Dear Mr. Taylor,

I have read the response filed in behalf of the Mathews Democratic Committee and the facts stated therein are true to the best of my knowledge.

F. Paul Blanock  
Chairman

Mathews Democratic  
Committee

Subscribed and sworn to before me this 22nd day of January, 1981, by F. Paul Blanock.

Roberta M. Hudgins  
Notary Public

My Commission expires: August 10, 1981

82040330312

911963

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81 JAN 26 P 1: 17

**McGUIRE, WOODS & BATTLE**  
ROSS BUILDING

COURT SQUARE BUILDING  
CHARLOTTESVILLE, VIRGINIA 22902  
TELEPHONE (804) 977-2500

**RICHMOND, VIRGINIA 23219**

TELEPHONE (804) 644-4131  
CABLE MCWOBAT  
TELEX 82-7414

137 YORK STREET  
WILLIAMSBURG, VIRGINIA 23185  
TELEPHONE (804) 229-2393

VIRGINIA NATIONAL BANK BUILDING  
NORFOLK, VIRGINIA 23510  
TELEPHONE (804) 627-7677

January 21, 1981

Federal Election Commission  
1325 K Street N.W.  
Washington, D. C.

Attn: William Taylor, Esquire

Re: MUR-1328

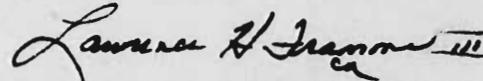
Dear Mr. Taylor:

The attached authorization from the Democratic Committee of Lunenburg County was inadvertently left out of my letter to you dated January 20, 1981. Please incorporate this authorization with the others sent to you.

Thank you.

Very truly yours,

McGUIRE, WOODS & BATTLE



Lawrence H. Framme, III

LHF, III/cfr

Enclosure

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81 JAN 26 P 2: 38

TELETYPE UNIT  
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81 JAN 14 P2: 23

**H. WATKINS ELLERSON, III**  
ATTORNEY AND COUNSELLOR AT LAW

SARAH C. HONENBERGER

P. O. BOX 1080  
110 BELLEVIEW AVE.  
ORANGE, VIRGINIA 22960  
(703) 672-1500

January 12, 1981

Charles N. Steele  
General Counsel  
Federal Election Commission  
Washington, DC 20463

Re: MUR #1328

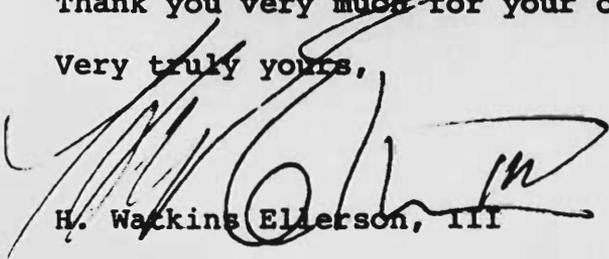
Dear Mr. Steele:

I have received your letter of December 31, 1980 and its enclosures, relating to an alleged violation of the Federal Election Campaign Act by The Orange County Democratic Committee. At this time we are not aware of any ad paid for by the local committee which would be considered in violation of the Act. The enclosures do not contain a copy of any ad that we supposedly paid for. Under the circumstances, I do not see how we can respond to an accusation that has not been narrowed down, and I trust that you will understand.

Mr. Lawrence H. Framme, III, Counsel for The Virginia Democratic Party, will be representing us in this matter. He may be written at 1400 Ross Building, Richmond, VA 23219, and his telephone number is (804)644-4131.

Thank you very much for your consideration in this matter.

Very truly yours,



H. Watkins Ellerson, III

HWE/tls

cc: Lawrence H. Framme, III, Esquire

82040330314

01:32 01 00 11

H. WATKINS ELLERSON, III

ATTORNEY AT LAW

P. O. BOX 1080

ORANGE, VIRGINIA 22960



31 JAN 1961



Charles N. Steele  
General Counsel  
Federal Election Commission  
Washington, DC 20463

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*Attn: Wm. Taylor, Esq.*

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81 JAN 14 A10: 02

S. FLIPPO HICKS  
MCGLANAHAN INGLES

**MARTIN, HICKS & INGLES, LTD.**

ATTORNEYS AND COUNSELLORS AT LAW  
COURT CIRCLE, P. O. BOX 788  
GLOUCESTER, VIRGINIA 23061

OF COUNSEL  
JAMES BLAND MARTIN

804 693-2800  
804 677-7371

January 8, 1981

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

Dear Sir:

This is in response to your letter of December 31, 1980.

We are requesting that no action be taken against the Gloucester Democratic Committee, as in our opinion we did not violate the law. We listed the ad as being sponsored by the Gloucester Democratic Committee, which paid for the ad, the Mathews Democratic Committee, and the Democratic National Committee. We further authorized Larry Framme, attorney of Richmond, to represent our committee in this matter.

Thank you.

Sincerely yours,



C. F. Hicks

CFH:p

cc: Larry Framme, Esquire  
Attorney at Law  
c/o Virginia Democratic Committee  
Suite 801, 7th and Franklin Streets  
Richmond, Virginia 23219

82040330316

COUNCIL

JAN 14 12:32

MARTIN, HICKS & INGLES, LTD.

ATTORNEYS AND COUNSELLORS AT LAW

GLOUCESTER, VIRGINIA 23061

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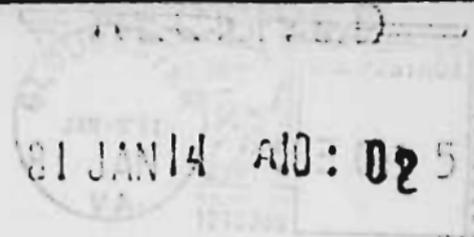
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Charles N. Steele, General Counsel  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

JIM EDMUNDS, DEMOCRAT  
P. O. Box 587  
KENBRIDGE, VIRGINIA 23944  
(804) 676-2647

January 6, 1981

Federal Election Commission  
1325 Kay Steet, N. W.  
Washington, D.C. 20463

Dear Commission Members:

This is to advise that the Lunenburg County Democratic Committee has designated Lawrence H. Framme, III, as its attorney in your pending case file, MUR No. 1328. His address is care of McGuire, Woods and Battle, 8th and Main Streets, Ross Building, Richmond, Virginia 23219.

Sincerely,

James T. Edmunds, Chairman  
Lunenburg County Democratic Committee

JTE:pmf

CC Lawrence H. Framme, III

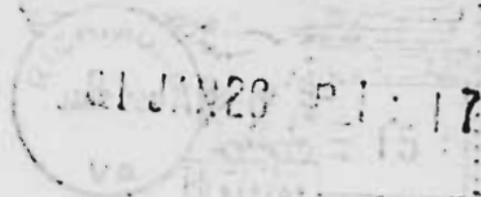
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McGUIRE, WOODS & BATTLE

ROSS BUILDING

RICHMOND, VIRGINIA 23219



Federal Election Commission  
1325 K Street, N.W.  
Washington, D. C. 20463

Attn: William Taylor, Esquire

RECEIVED  
81 JAN 28 1981

To: Federal Election Commission  
Washington, D. C.  
Attn: William Taylor, Esquire

Re: MUR-1328

Dear Mr. Taylor,

I have read the response filed in behalf of the Greene County Democratic Committee and the facts stated therein are true to the best of my knowledge.

Constance J. Dudley  
Chairman

Greene County Democratic  
Committee

Audrey P. Morris  
1-22-81 Notary Public

82040330320

68:2-81

DUDLEY  
Rt. 1, Box 215K  
Stanardsville, VA 22973

92040330321



William Taylor, Esquire  
Federal Election Commission  
Washington, D. C. 20463

RECEIVED  
602 3919  
81 JAN 26 11:18

To: Federal Election Commission  
Washington, D. C.  
Attn: William Taylor, Esquire

Re: MUR-1328

Dear Mr. Taylor,

I have read the response filed in behalf of  
the Moochland Democratic Committee and  
the facts stated therein are true to the best of  
my knowledge.

Nancy T. Bowles  
Chairman

Moochland Democratic  
Committee

STATE OF VIRGINIA,  
COUNTY OF FLUVANNA,

I hereby certify that the foregoing instrument was  
acknowledged before me this 23rd day of January, 1981,  
by Nancy T. Bowles.

Patricia M. Payne  
Notary Public

My Commission Expires: October 24, 1981.

82040330322

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N. Bowles  
Box 284  
Kents Store, Va.  
23084

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William Taylor, Esquire  
Federal Election Commission  
Wash. D.C. 20463



USA 15c  
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81 JAN 26 PM 17

To: Federal Election Commission  
Washington, D. C.  
Attn: William Taylor, Esquire

Re: MUR-1328

Dear Mr. Taylor,

I have read the response filed in behalf of  
the Botetourt County Democratic Committee and  
the facts stated therein are true to the best of  
my knowledge. AS SHOWN ON AMENDED PAGE SIX  
Attached hereto.

Charles D. Carter  
Chairman R+1 Box 407, Dalawille, Va 24083

Botetourt County Democratic  
Committee

32040330324

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routinely places advertisements in its local newspaper advocating election of Democratic candidates before each election. The City Democratic Committee of Hopewell was unaware of the prohibitions of the Federal Election Campaign Act concerning payment for advertising unambiguously referring to presidential candidates on its own account. The City Democratic Committee of Hopewell has requested the Democratic National Committee to ratify its expenditure for the advertisement as an agency expenditure of the Democratic National Committee and that it report it accordingly. The City Democratic Committee of Hopewell anticipates a favorable response by the Democratic National Committee. Based on the above, the City Democratic Committee of Hopewell believes that it did not violate the Federal Election Campaign Act and, therefore, asks the Commission to dismiss the complaint against it.

8. Botetourt County Democratic Committee, Claude D. Carter, Chairman. The Botetourt County Democratic Committee did place the advertisement attached as Exhibit I to the Addendum to Complaint of the Republican Party of Virginia. The advertisement was paid for by that Committee at a cost of ~~498.00~~ \$48<sup>00</sup>.

\* AN in Kind Contribution.

Before running the advertisement, the Chairman of the Botetourt County Democratic Committee inquired of the Virginia State Carter/Mondale Headquarters whether such advertisement by local committees was permissible. The Chairman was advised by someone in the Virginia State Carter/Mondale Headquarters that such advertising was permissible as ~~long as the total cost did not ex-~~ ~~ceed \$1,000.00.~~ At the time the Botetourt County Democratic Committee was unaware of the prohibitions of the Federal Election Campaign Act regarding placement of advertising unambiguously referring to presidential candidates on the account of the local committee. The Botetourt County Democratic Committee has requested the Democratic National Committee to ratify its expenditure as an agency expenditure of the Democratic National Committee and to report it to the Federal Election Commission accordingly. The Botetourt County Democratic Committee believes that the Democratic National Committee will act favorably on its request and for this reason does not believe that it violated the Federal Election Campaign Act. Accordingly, it requests the Commission to dismiss the Complaint against it.

C.D. Carter  
Rt 6 Box 407  
Daleville, Va 24083

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1981

ALWAYS USE

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Mr. William Taylor, Esquire  
Federal Election Commission  
Washington, D.C. 20463

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REC'D  
81 JAN 26 P 1: 18

To: Federal Election Commission  
Washington, D. C.  
Attn: William Taylor, Esquire

Re: MUR-1328

Dear Mr. Taylor,

I have read the response filed in behalf of  
the Henry County Democratic Committee and  
the facts stated therein are true to the best of  
my knowledge.

F. E. Marsh Jr  
Chairman

Henry County Democratic  
Committee

92040330327

68:28 02 JAN 1961

Box G  
Bassett, Va. 24053

8204033002



61 JAN 26



Federal Election Commission  
Washington, D.C.

Attn. William Taylor, Esquire

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81 JAN 26 09:49

**JIM EDMUNDS, DEMOCRAT**  
P. O. Box 387  
KEMBRIDGE, VIRGINIA 23044  
(804) 678-2647

January 22, 1981

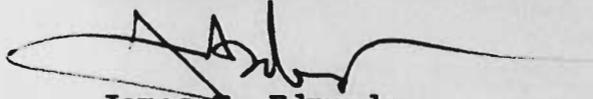
William Taylor, Esquire  
Federal Election Commission  
Washington, D. C. 20463

RE: MUR-1328

Dear Mr. Taylor:

I enclose the notarized MUR-1328 herein.

Sincerely,



James T. Edmunds

JTE:pmf

Enclosure

CC Lawrence H. Framme, III, Esquire  
1400 Ross Building  
Richmond, Virginia 23219

82040330329

81 JAN 26 11:27

RECEIVED

81 JAN 26 09:49

To: Federal Election Commission  
Washington, D. C.  
Attn: William Taylor, Esquire

Re: MUR-1328

Dear Mr. Taylor,

I have read the response filed in behalf of the Lunenburg County Democratic Committee and the facts stated therein are true to the best of my knowledge.

  
Chairman

Lunenburg County Democratic  
Committee

State of Virginia,  
County of Lunenburg, to-wit:

The foregoing instrument was acknowledged before me this 22nd day of January, 1981, by James T. Edmunds.

My commission expires: Sept. 13, 1983.

  
Notary Public

82040330330

1400 ROSS BUILDING  
RICHMOND, VIRGINIA 23218

January 20, 1981

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

MUR 1328

Gentlemen:

8 2 0 4 0 3 3 0 3 3 1

This response to the above-named Complaint is filed on behalf of all local Democratic Committees named in the Addendum to Complaint filed by the Virginia Republican Party with the Commission on December 15, 1980. Documents authorizing me to represent the Green, Goochland, Lunenburg, Botetourt, Henry, Warren and Galax committees are enclosed. Similar documents from the Orange and Gloucester committees have already been sent directly to you. Documents from the Roanoke, Mathews, Hopewell, Martinsville and Grayson committees are being sent directly to you. All of these committees deny they have violated the Federal Election Campaign Act of 1971, but state that if a technical violation did occur, such was inadvertent and unintentional and in no way prejudiced any candidate.

Following a response containing points common to all committees complained of, individual committee responses will be set forth in the same order that they appear in the Complaint.

Matters Common To All Of The Committees Complained Of

Several points are common to all of the committees complained of by the Republican Party. With the exception of the advertisement placed by the Hopewell City Democratic Committee in the Petersburg Progress Index, all advertisements were placed in local, rural newspapers of very limited circulation. None of these newspapers were of daily circulation. While the Petersburg Progress Index has a daily circulation, its circulation is limited to the area of Petersburg, Virginia and the immediately surrounding counties. There was no

intent on the part of any committee to violate the Act. In those instances set forth below where committees made inquiries about their ability to advertise, they were unfortunately given incorrect information by persons in the Virginia Carter/Mondale Campaign.

Those committees who placed ads are seeking to cure any possible technical violation of the Act by requesting the Democratic Carter/Mondale Committee to authorize their expenditures under Section 441a (d) of the Federal Election Campaign Act. Certainly, the limited nature of the ads, their limited circulation and the outcome of the election in Virginia (Mr. Reagan carried Virginia by 237,435 votes), demonstrates that there was no prejudice to any candidate by the placement of the ads.

Individual Responses

1. Roanoke County Democratic Committee, Betty Ann Saunders, Chairman. The Roanoke County Democratic Committee did not place any newspaper advertisements in connection with the 1980 presidential election. The advertisement listed as Exhibit A in the Complaint bears a disclaimer stating that it was placed on the authority of the Roanoke City Democratic Committee. The Roanoke City Democratic Committee is a different entity than the Roanoke County Democratic Committee. The City of Roanoke is an independent city having its own Democratic committee. The Roanoke County Democratic Committee, therefore, denies that it violated the Federal Election Campaign Act of 1971.
2. Greene County Democratic Committee, Constance Dudley, Chairman. The newspaper advertisement attached to the Complaint as Exhibit C was placed by the Greene County Democratic Committee. Its cost of \$86.24 was paid by the Greene County Democratic Committee. The Greene County Committee, like many Virginia local committees, routinely place advertising advocating the election of Democratic candidates in a local newspaper shortly before elections.

The officers of the Greene County Democratic Committee who placed the advertisement were unaware of that portion of the Federal Election Campaign Act prohibiting local party committees from placing advertisements at their own expense which unambiguously refer to a presidential candidate. The Committee has requested

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Democratic National Committee under authority of Section 441a (d). The Democratic National Committee has not yet responded to this request, but the Committee expects it to act favorably on its request and to report this expenditure in its next report to the Commission. The Greene County Democratic Committee contends that with the reporting by the Democratic National Committee there will be no violation of the Federal Election Campaign Act and, therefore, asks the Commission to dismiss the Complaint against it.

- 8 2 0 4 0 3 3 0 3 3 3
3. Orange County Democratic Committee, H. Watkins Ellerson, III, Chairman. The Addendum to the Complaint filed by the Virginia Republican Party did not contain a copy of any advertisement placed by the Orange County Democratic Committee. The Orange County Democratic Committee did not authorize the placement of any newspaper advertising advocating the election of a presidential candidate in the 1980 election. The Orange County Democratic Committee is aware that an advertisement advocating the re-election of President Carter and Walter Mondale was placed by two individual members of the Committee and paid for with their own funds. To the best of the knowledge of the Orange County Democratic Committee that advertisement was placed by the Committee members as individuals and was not placed in consultation with, at the expense of or with the authorization of the Orange County Democratic Committee. Also, to the best of the Committee's knowledge, the advertisement was not placed at the direction of or in consultation with the Carter/Mondale Presidential Campaign.

Based on the facts set forth above, the Orange County Democratic Committee does not believe that it violated the Federal Election Campaign Act of 1971 and, therefore, asks the Commission to dismiss the Complaint against it.

4. Gloucester County Democratic Committee, C. F. Hicks, Chairman, and Mathews County Democratic Committee, F. Paul Blanock, Chairman. The advertisement attached as Exhibit F to the Addendum to the Complaint of the Virginia Republican Party was placed and paid for by the Gloucester County Democratic Committee and the

Mathews County Democratic Committee. The cost of the advertisement was \$195.00. At the time the advertisement was placed and at this time the Gloucester and Mathews County Democratic Committees believe that they were authorized to place the advertisement as agents of the Democratic National Committee pursuant to the Democratic National Committee's authority to place such advertisements under Section 441a (d) of the Federal Election Campaign Act. Immediately before placing the advertisement, the Chairman of the Gloucester County Democratic Committee was advised that the Democratic National Committee had authorized the placement of the advertisement. At this time a request has been made to the Democratic National Committee to report the expenditure in its next report to the Federal Election Commission. While a formal response to this request has not yet been received from the Democratic National Committee, the Gloucester and Mathews Democratic Committees believe that a favorable response will be received. For this reason, the Gloucester and Mathews County Democratic Committees believe that they did not violate the Federal Election Campaign Act of 1971 and, therefore, ask the Commission to dismiss the complaint against them. It should be noted that the disclaimer on the advertisement does state that it was paid for by the Democratic National Committee in addition to other sources.

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5. Goochland County Democratic Committee, Nancy Bowles, Chairman. The advertisement attached as Exhibit G to the Addendum to the Complaint of the Virginia Republican Party was placed by the Goochland County Democratic Committee and paid for by that Committee. The cost of the advertisement was \$123.48. The circumstances surrounding the placement of the advertisement are similar to those of the advertisement placed by the Greene County Democratic Committee. The Goochland County Democratic Committee has customarily and routinely placed advertisements advocating the election of Democratic candidates in its local newspaper shortly before each election. At the time that the advertisement was placed, the officers of the Goochland County Democratic Committee were unaware of those portions of the Federal Election Campaign Act prohibiting local committees from placing advertisements

unambiguously referring to presidential candidates at their own expense.

The Goochland County Democratic Committee has requested the Democratic National Committee to ratify its expenditure as an agent of the Democratic National Committee and to report the expenditure on the next report to the Federal Election Commission. The Goochland County Democratic Committee expects a favorable response to this request. Based on this, the Goochland County Democratic Committee believes that it did not violate the Federal Election Campaign Act of 1971 and, therefore, asks the Commission to dismiss the complaint against it.

- 8 2 0 4 0 3 3 0 3 3 5
6. Lunenburg County Democratic Committee, James Edmunds, Chairman. The Lunenburg County Democratic Committee did place the advertisement attached as Exhibit H to the Addendum to Complaint filed by the Republican Party of Virginia. Like the Greene and Goochland County Committees, the Lunenburg County Democratic Committee customarily places advertising advocating the election of Democratic candidates shortly before each election. At the time of placing the advertisement attached as Exhibit H, the Lunenburg County Democratic Committee was unaware of those portions of the Federal Election Campaign Act prohibiting local committees from placing such advertisements on their own account in presidential elections. The Lunenburg County Democratic Committee has requested the Democratic National Committee to ratify its expenditure for the advertisement in the amount of \$126.00 as an agency expenditure of the Democratic National Committee and that it be reported accordingly. On the basis of the above, the Lunenburg County Democratic Committee does not believe that it violated the Federal Election Campaign Act of 1971 and, therefore, requests the Commission to dismiss the Complaint against it.
  7. City Democratic Committee of Hopewell, Virginia, Hilda Traina, Chairman. The City Democratic Committee of Hopewell did place the advertisement attached as Exhibit J to the Addendum to Complaint of the Virginia Republican Party. The circumstances surrounding its placement are similar to those of Greene, Goochland and Lunenburg County. The City Democratic Committee of Hopewell customarily and

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routinely places advertisements in its local newspaper advocating election of Democratic candidates before each election. The City Democratic Committee of Hopewell was unaware of the prohibitions of the Federal Election Campaign Act concerning payment for advertising unambiguously referring to presidential candidates on its own account. The City Democratic Committee of Hopewell has requested the Democratic National Committee to ratify its expenditure for the advertisement as an agency expenditure of the Democratic National Committee and that it report it accordingly. The City Democratic Committee of Hopewell anticipates a favorable response by the Democratic National Committee. Based on the above, the City Democratic Committee of Hopewell believes that it did not violate the Federal Election Campaign Act and, therefore, asks the Commission to dismiss the complaint against it.

8. Botetourt County Democratic Committee, Claude D. Carter, Chairman. The Botetourt County Democratic Committee did place the advertisement attached as Exhibit I to the Addendum to Complaint of the Republican Party of Virginia. The advertisement was paid for by that Committee at a cost of \$98.00.

Before running the advertisement, the Chairman of the Botetourt County Democratic Committee inquired of the Virginia State Carter/Mondale Headquarters whether such advertisement by local committees was permissible. The Chairman was advised by someone in the Virginia State Carter/Mondale Headquarters that such advertising was permissible as long as the total cost did not exceed \$1,000.00. At the time the Botetourt County Democratic Committee was unaware of the prohibitions of the Federal Election Campaign Act regarding placement of advertising unambiguously referring to presidential candidates on the account of the local committee. The Botetourt County Democratic Committee has requested the Democratic National Committee to ratify its expenditure as an agency expenditure of the Democratic National Committee and to report it to the Federal Election Commission accordingly. The Botetourt County Democratic Committee believes that the Democratic National Committee will act favorably on its request and for this reason does not believe that it violated the Federal Election Campaign Act. Accordingly, it requests the Commission to dismiss the Complaint against it.

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9. The City Democratic Committee of Martinsville, Virginia Hall, Chairman, and Henry County Democratic Committee, F. E. Marsh, Chairman. The Martinsville City Democratic Committee and Henry County Democratic Committee jointly placed the advertisements attached as Exhibits K and L to the Addendum to Complaint of the Republican Party of Virginia. Before placing the advertisements the Chairman of the Martinsville City Democratic Committee inquired of the Virginia State Carter/Mondale Headquarters as to whether such advertisement was permissible. The Chairman was advised by someone at the Headquarters that such advertising was permissible as long as the total cost of the advertising did not exceed \$1,000.00. Based on this advice, the Chairman placed the advertising. At that time neither the Martinsville City Democratic Committee or the Henry County Democratic Committee were aware of the provisions of the Federal Election Campaign Act relating to advertising by a local party committee. The Martinsville City Democratic Committee and the Henry County Democratic Committee have requested the Democratic National Committee to ratify its expenditure of \$100.00 as an agency expenditure of the Democratic National Committee. It expects a favorable response from the Democratic National Committee and that the Democratic National Committee will report the expenditure accordingly. For these reasons the Martinsville City Democratic Committee and the Henry County Democratic Committee believe that they did not violate the Federal Election Campaign Act and, therefore, ask the Commission to dismiss the complaint against them.
10. Warren County Democratic Committee, Claude A. Stokes, Chairman. The Warren County Democratic Committee did place the advertisement attached as Exhibit M to the Addendum to Complaint of the Republican Party of Virginia. Circumstances surrounding the placement of that advertisement are similar to those of Greene, Goochland, Lunenburg and others. The Warren County Democratic Committee routinely and customarily places advertisements advocating the election of Democratic candidates immediately before each election. At the time of the placing of this advertisement, at a cost of \$86.00, the Warren County Democratic Committee was unaware of the provisions of the Federal Election

Campaign Act of 1971 regarding the placement of such advertising by local committees. The Warren County Democratic Committee has now requested the Democratic National Committee to ratify its expenditure as an agency expenditure of the Democratic National Committee and to report it accordingly. It expects a favorable response by the Democratic National Committee. Therefore, the Warren County Democratic National Committee believes that it did not violate the Federal Election Campaign Act and, therefore, asks the Commission to dismiss the Complaint against it.

11. Galax City Democratic Committee, Dr. Van B. McCarter, Chairman, and Grayson County Democratic Committee, Kenneth Broom, Chairman. The Galax City and Grayson County Democratic Committees jointly placed the advertisement attached as Exhibit N to the Addendum to Complaint of the Republican Party of Virginia. The cost of the advertisement, \$125.00, was jointly paid by the two Committees. Before placing the advertisement, the Chairman of the Grayson County Democratic Committee inquired of the Ninth District coordinator for the Carter/Mondale Presidential Campaign as to whether or not a local committee was permitted to place such advertising. He was advised by the coordinator that such advertising was permissible provided the total amount of the advertising did not exceed \$1,000.00. At the time of placing the advertisement neither the Grayson County nor Galax City Democratic Committee were aware of the provisions of the Federal Election Campaign Act governing the placement of advertising by local committees on their own account. The Grayson County and Galax City Democratic Committees have requested the Democratic National Committee to ratify their expenditures as agency expenditures and to report them in its next report to the Federal Election Commission. The Committees expect a favorable response from the Democratic National Committee. For these reasons the Grayson County and Galax City Committees believe that they did not violate the Federal Election Campaign Act and, therefore, ask the Commission to dismiss the Complaint against them.

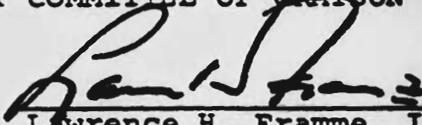
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For the foregoing reasons, the Committees respectfully request the Commission to dismiss the complaints against them.

Because of the number of the Complaints included in the Addendum of the Republican Party and the fact that the committees involved are scattered throughout the state of Virginia, it is not possible to include a sworn statement of each of the committees involved in this response. However, this response does embody the facts recited to counsel by each of the committee chairmen. A copy of this response sworn to by each of the committee chairmen will be forwarded to the Commission directly from each chairman as soon as possible.

THE DEMOCRATIC COUNTY COMMITTEE OF ROANOKE COUNTY  
THE DEMOCRATIC COUNTY COMMITTEE OF GREENE COUNTY  
THE DEMOCRATIC COUNTY COMMITTEE OF ORANGE COUNTY  
THE DEMOCRATIC COUNTY COMMITTEE OF GLOUCESTER COUNTY  
THE DEMOCRATIC COUNTY COMMITTEE OF MATHEWS COUNTY  
THE DEMOCRATIC COUNTY COMMITTEE OF GOOCHLAND COUNTY  
THE DEMOCRATIC COUNTY COMMITTEE OF LUNENBURG COUNTY  
THE DEMOCRATIC CITY COMMITTEE OF HOPEWELL, VIRGINIA  
THE DEMOCRATIC COUNTY COMMITTEE OF BOTETOURT COUNTY  
THE DEMOCRATIC COUNTY COMMITTEE OF HENRY COUNTY  
THE DEMOCRATIC CITY COMMITTEE OF MARTINSVILLE, VIRGINIA  
THE DEMOCRATIC COUNTY COMMITTEE OF WARREN COUNTY  
THE DEMOCRATIC CITY COMMITTEE OF GALAX, VIRGINIA  
THE DEMOCRATIC COUNTY COMMITTEE OF GRAYSON COUNTY

By:

  
Lawrence H. Framme, III  
Counsel

82040330339

Mr. James T. Edmunds  
Democrat  
P. O. Box 387  
Kenbridge, Va. 23944



William Taylor, Esquire  
Federal Election Committee  
Washington, D.C. 20463

REC-5805

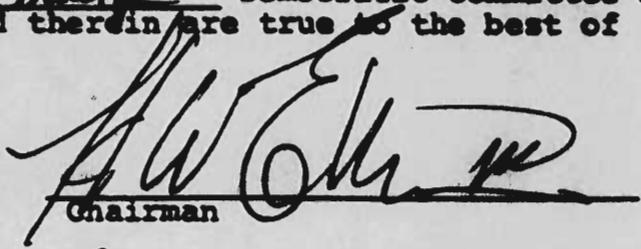
81 JAN 28 10:48

To: Federal Election Commission  
Washington, D. C.  
Attn: William Taylor, Esquire

Re: MUR-1328

Dear Mr. Taylor,

I have read the response filed in behalf of the Orange County Democratic Committee and the facts stated therein are true to the best of my knowledge.

  
Chairman

Orange County Democratic  
Committee

STATE OF VIRGINIA  
County of Orange, to-wit:

Subscribed and sworn to before me, a Notary Public for the aforesaid jurisdiction, this 22nd day of January, 1981, by H. Watkins Ellerson, III, Chairman, Orange County Democratic Committee.

My Commission expires: March 30, 1983

  
Notary Public

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FEB 11 1981

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H. WATKINS ELLERSON, III  
ATTORNEY AT LAW  
P. O. BOX 1080  
ORANGE, VIRGINIA 22960



JUN 21 1981



William Taylor, Esquire  
Federal Election Commission  
Washington, DC 20463



intent on the part of any committee to violate the Act. In those instances set forth below where committees made inquiries about their ability to advertise, they were unfortunately given incorrect information by persons in the Virginia Carter/Mondale Campaign.

Those committees who placed ads are seeking to cure any possible technical violation of the Act by requesting the Democratic Carter/Mondale Committee to authorize their expenditures under Section 441a (d) of the Federal Election Campaign Act. Certainly, the limited nature of the ads, their limited circulation and the outcome of the election in Virginia (Mr. Reagan carried Virginia by 237,435 votes), demonstrates that there was no prejudice to any candidate by the placement of the ads.

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Individual Responses

1. Roanoke County Democratic Committee, Betty Ann Saunders, Chairman. The Roanoke County Democratic Committee did not place any newspaper advertisements in connection with the 1980 presidential election. The advertisement listed as Exhibit A in the Complaint bears a disclaimer stating that it was placed on the authority of the Roanoke City Democratic Committee. The Roanoke City Democratic Committee is a different entity than the Roanoke County Democratic Committee. The City of Roanoke is an independent city having its own Democratic committee. The Roanoke County Democratic Committee, therefore, denies that it violated the Federal Election Campaign Act of 1971.
2. Greene County Democratic Committee, Constance Dudley, Chairman. The newspaper advertisement attached to the Complaint as Exhibit C was placed by the Greene County Democratic Committee. Its cost of \$86.24 was paid by the Greene County Democratic Committee. The Greene County Committee, like many Virginia local committees, routinely place advertising advocating the election of Democratic candidates in a local newspaper shortly before elections.

The officers of the Greene County Democratic Committee who placed the advertisement were unaware of that portion of the Federal Election Campaign Act prohibiting local party committees from placing advertisements at their own expense which unambiguously refer to a presidential candidate. The Committee has requested

Democratic National Committee under authority of Section 441a (d). The Democratic National Committee has not yet responded to this request, but the Committee expects it to act favorably on ~~its~~ request and to report this expenditure in its next report to the Commission. The Greene County Democratic Committee contends that with the reporting by the Democratic National Committee there will be no violation of the Federal Election Campaign Act and, therefore, asks the Commission to dismiss the Complaint against it.

- 8 2 0 4 0 3 3 0 3 4 5
3. Orange County Democratic Committee, H. Watkins Ellerson, III, Chairman. The Addendum to the Complaint filed by the Virginia Republican Party did not contain a copy of any advertisement placed by the Orange County Democratic Committee. The Orange County Democratic Committee did not authorize the placement of any newspaper advertising advocating the election of a presidential candidate in the 1980 election. The Orange County Democratic Committee is aware that an advertisement advocating the re-election of President Carter and Walter Mondale was placed by two individual members of the Committee and paid for with their own funds. To the best of the knowledge of the Orange County Democratic Committee that advertisement was placed by the Committee members as individuals and was not placed in consultation with, at the expense of or with the authorization of the Orange County Democratic Committee. Also, to the best of the Committee's knowledge, the advertisement was not placed at the direction of or in consultation with the Carter/Mondale Presidential Campaign.

Based on the facts set forth above, the Orange County Democratic Committee does not believe that it violated the Federal Election Campaign Act of 1971 and, therefore, asks the Commission to dismiss the Complaint against it.

4. Gloucester County Democratic Committee, C. F. Hicks, Chairman, and Mathews County Democratic Committee, F. Paul Blanock, Chairman. The advertisement attached as Exhibit F to the Addendum to the Complaint of the Virginia Republican Party was placed and paid for by the Gloucester County Democratic Committee and the

Mathews County Democratic Committee. The cost of the advertisement was \$195.00. At the time the advertisement was placed and at this time the Gloucester and Mathews County Democratic Committees believe that they were authorized to place the advertisement as agents of the Democratic National Committee pursuant to the Democratic National Committee's authority to place such advertisements under Section 441a (d) of the Federal Election Campaign Act. Immediately before placing the advertisement, the Chairman of the Gloucester County Democratic Committee was advised that the Democratic National Committee had authorized the placement of the advertisement. At this time a request has been made to the Democratic National Committee to report the expenditure in its next report to the Federal Election Commission. While a formal response to this request has not yet been received from the Democratic National Committee, the Gloucester and Mathews Democratic Committees believe that a favorable response will be received. For this reason, the Gloucester and Mathews County Democratic Committees believe that they did not violate the Federal Election Campaign Act of 1971 and, therefore, ask the Commission to dismiss the complaint against them. It should be noted that the disclaimer on the advertisement does state that it was paid for by the Democratic National Committee in addition to other sources.

- 8 2 0 4 0 3 3 0 3 4 6
5. Goochland County Democratic Committee, Nancy Bowles, Chairman. The advertisement attached as Exhibit G to the Addendum to the Complaint of the Virginia Republican Party was placed by the Goochland County Democratic Committee and paid for by that Committee. The cost of the advertisement was \$123.48. The circumstances surrounding the placement of the advertisement are similar to those of the advertisement placed by the Greene County Democratic Committee. The Goochland County Democratic Committee has customarily and routinely placed advertisements advocating the election of Democratic candidates in its local newspaper shortly before each election. At the time that the advertisement was placed, the officers of the Goochland County Democratic Committee were unaware of those portions of the Federal Election Campaign Act prohibiting local committees from placing advertisements

unambiguously referring to presidential candidates at their own expense.

The Goochland County Democratic Committee has requested the Democratic National Committee to ratify its expenditure as an agent of the Democratic National Committee and to report the expenditure on the next report to the Federal Election Commission. The Goochland County Democratic Committee expects a favorable response to this request. Based on this, the Goochland County Democratic Committee believes that it did not violate the Federal Election Campaign Act of 1971 and, therefore, asks the Commission to dismiss the complaint against it.

- 8 2 0 4 0 3 3 0 3 4 7
6. Lunenburg County Democratic Committee, James Edmunds, Chairman. The Lunenburg County Democratic Committee did place the advertisement attached as Exhibit H to the Addendum to Complaint filed by the Republican Party of Virginia. Like the Greene and Goochland County Committees, the Lunenburg County Democratic Committee customarily places advertising advocating the election of Democratic candidates shortly before each election. At the time of placing the advertisement attached as Exhibit H, the Lunenburg County Democratic Committee was unaware of those portions of the Federal Election Campaign Act prohibiting local committees from placing such advertisements on their own account in presidential elections. The Lunenburg County Democratic Committee has requested the Democratic National Committee to ratify its expenditure for the advertisement in the amount of \$126.00 as an agency expenditure of the Democratic National Committee and that it be reported accordingly. On the basis of the above, the Lunenburg County Democratic Committee does not believe that it violated the Federal Election Campaign Act of 1971 and, therefore, requests the Commission to dismiss the Complaint against it.
  7. City Democratic Committee of Hopewell, Virginia, Hilda Traina, Chairman. The City Democratic Committee of Hopewell did place the advertisement attached as Exhibit J to the Addendum to Complaint of the Virginia Republican Party. The circumstances surrounding its placement are similar to those of Greene, Goochland and Lunenburg County. The City Democratic Committee of Hopewell customarily and

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routinely places advertisements in its local newspaper advocating election of Democratic candidates before each election. The City Democratic Committee of Hopewell was unaware of the prohibitions of the Federal Election Campaign Act concerning payment for advertising unambiguously referring to presidential candidates on its own account. The City Democratic Committee of Hopewell has requested the Democratic National Committee to ratify its expenditure for the advertisement as an agency expenditure of the Democratic National Committee and that it report it accordingly. The City Democratic Committee of Hopewell anticipates a favorable response by the Democratic National Committee. Based on the above, the City Democratic Committee of Hopewell believes that it did not violate the Federal Election Campaign Act and, therefore, asks the Commission to dismiss the complaint against it.

8. Botetourt County Democratic Committee, Claude D. Carter, Chairman. The Botetourt County Democratic Committee did place the advertisement attached as Exhibit I to the Addendum to Complaint of the Republican Party of Virginia. The advertisement was paid for by that Committee at a cost of \$98.00.

Before running the advertisement, the Chairman of the Botetourt County Democratic Committee inquired of the Virginia State Carter/Mondale Headquarters whether such advertisement by local committees was permissible. The Chairman was advised by someone in the Virginia State Carter/Mondale Headquarters that such advertising was permissible as long as the total cost did not exceed \$1,000.00. At the time the Botetourt County Democratic Committee was unaware of the prohibitions of the Federal Election Campaign Act regarding placement of advertising unambiguously referring to presidential candidates on the account of the local committee. The Botetourt County Democratic Committee has requested the Democratic National Committee to ratify its expenditure as an agency expenditure of the Democratic National Committee and to report it to the Federal Election Commission accordingly. The Botetourt County Democratic Committee believes that the Democratic National Committee will act favorably on its request and for this reason does not believe that it violated the Federal Election Campaign Act. Accordingly, it requests the Commission to dismiss the Complaint against it.

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9. The City Democratic Committee of Martinsville, Virginia Hall, Chairman, and Henry County Democratic Committee, F. E. Marsh, Chairman. The Martinsville City Democratic Committee and Henry County Democratic Committee jointly placed the advertisements attached as Exhibits K and L to the Addendum to Complaint of the Republican Party of Virginia. Before placing the advertisements the Chairman of the Martinsville City Democratic Committee inquired of the Virginia State Carter/Mondale Headquarters as to whether such advertisement was permissible. The Chairman was advised by someone at the Headquarters that such advertising was permissible as long as the total cost of the advertising did not exceed \$1,000.00. Based on this advice, the Chairman placed the advertising. At that time neither the Martinsville City Democratic Committee or the Henry County Democratic Committee were aware of the provisions of the Federal Election Campaign Act relating to advertising by a local party committee. The Martinsville City Democratic Committee and the Henry County Democratic Committee have requested the Democratic National Committee to ratify its expenditure of \$100.00 as an agency expenditure of the Democratic National Committee. It expects a favorable response from the Democratic National Committee and that the Democratic National Committee will report the expenditure accordingly. For these reasons the Martinsville City Democratic Committee and the Henry County Democratic Committee believe that they did not violate the Federal Election Campaign Act and, therefore, ask the Commission to dismiss the complaint against them.
  
10. Warren County Democratic Committee, Claude A. Stokes, Chairman. The Warren County Democratic Committee did place the advertisement attached as Exhibit M to the Addendum to Complaint of the Republican Party of Virginia. Circumstances surrounding the placement of that advertisement are similar to those of Greene, Goochland, Lunenburg and others. The Warren County Democratic Committee routinely and customarily places advertisements advocating the election of Democratic candidates immediately before each election. At the time of the placing of this advertisement, at a cost of \$86.00, the Warren County Democratic Committee was unaware of the provisions of the Federal Election

Campaign Act of 1971 regarding the placement of such advertising by local committees. The Warren County Democratic Committee has now requested the Democratic National Committee to ratify its expenditure as an agency expenditure of the Democratic National Committee and to report it accordingly. It expects a favorable response by the Democratic National Committee. Therefore, the Warren County Democratic National Committee believes that it did not violate the Federal Election Campaign Act and, therefore, asks the Commission to dismiss the Complaint against it.

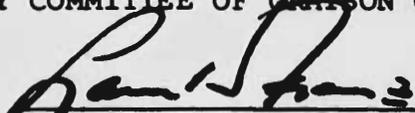
- 8 2 0 4 0 3 3 0 3 5 0
11. Galax City Democratic Committee, Dr. Van B. McCarter, Chairman, and Grayson County Democratic Committee, Kenneth Broom, Chairman. The Galax City and Grayson County Democratic Committees jointly placed the advertisement attached as Exhibit N to the Addendum to Complaint of the Republican Party of Virginia. The cost of the advertisement, \$125.00, was jointly paid by the two Committees. Before placing the advertisement, the Chairman of the Grayson County Democratic Committee inquired of the Ninth District coordinator for the Carter/Mondale Presidential Campaign as to whether or not a local committee was permitted to place such advertising. He was advised by the coordinator that such advertising was permissible provided the total amount of the advertising did not exceed \$1,000.00. At the time of placing the advertisement neither the Grayson County nor Galax City Democratic Committee were aware of the provisions of the Federal Election Campaign Act governing the placement of advertising by local committees on their own account. The Grayson County and Galax City Democratic Committees have requested the Democratic National Committee to ratify their expenditures as agency expenditures and to report them in its next report to the Federal Election Commission. The Committees expect a favorable response from the Democratic National Committee. For these reasons the Grayson County and Galax City Committees believe that they did not violate the Federal Election Campaign Act and, therefore, ask the Commission to dismiss the Complaint against them.

For the foregoing reasons, the Committees respectfully request the Commission to dismiss the complaints against them.

Because of the number of the Complaints included in the Addendum of the Republican Party and the fact that the committees involved are scattered throughout the state of Virginia, it is not possible to include a sworn statement of each of the committees involved in this response. However, this response does embody the facts recited to counsel by each of the committee chairmen. A copy of this response sworn to by each of the committee chairmen will be forwarded to the Commission directly from each chairman as soon as possible.

- THE DEMOCRATIC COUNTY COMMITTEE OF ROANOKE COUNTY
- THE DEMOCRATIC COUNTY COMMITTEE OF GREENE COUNTY
- THE DEMOCRATIC COUNTY COMMITTEE OF ORANGE COUNTY
- THE DEMOCRATIC COUNTY COMMITTEE OF GLOUCESTER COUNTY
- THE DEMOCRATIC COUNTY COMMITTEE OF MATHEWS COUNTY
- THE DEMOCRATIC COUNTY COMMITTEE OF GOOCHLAND COUNTY
- THE DEMOCRATIC COUNTY COMMITTEE OF LUNENBURG COUNTY
- THE DEMOCRATIC CITY COMMITTEE OF HOPEWELL, VIRGINIA
- THE DEMOCRATIC COUNTY COMMITTEE OF BOTETOURT COUNTY
- THE DEMOCRATIC COUNTY COMMITTEE OF HENRY COUNTY
- THE DEMOCRATIC CITY COMMITTEE OF MARTINSVILLE, VIRGINIA
- THE DEMOCRATIC COUNTY COMMITTEE OF WARREN COUNTY
- THE DEMOCRATIC CITY COMMITTEE OF GALAX, VIRGINIA
- THE DEMOCRATIC COUNTY COMMITTEE OF GRAYSON COUNTY

By:

  
Lawrence H. Framme, III  
Counsel

8 2 0 4 0 3 3 0 3 5 1

CLAUDE D. CARTER  
ROUTE 1, BOX 407  
DALEVILLE, VIRGINIA 24083  
PHONE 888-1888

81 JAN 26 9:54

December 17, 1980

The Federal Election Commission  
1325 K Street, N.W.  
Washington, DC 20463

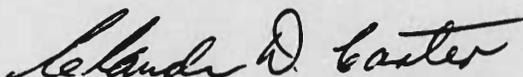
Re: Federal Election Law Complaint Against  
Botetourt County Democratic Committee  
Botetourt County, Virginia

Gentlemen:

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Earlier in the year 1980, I was elected as Chairman of the Botetourt County Democratic Committee and am still serving in that capacity. I am advised that a complaint has been filed against the Botetourt County Democratic Committee involving a federal election law violation.

It is my desire for Mr. Lawrence H. Framme, III, an attorney whose address is The Ross Building, Richmond, Virginia, to represent the Botetourt County Democratic Committee in this federal elections law complaint, and I would appreciate your considering this letter as my authorization as Chairman of the Botetourt County Democratic Committee in appointing and designating Mr. Lawrence H. Framme, III to act as the attorney.

Very truly yours,



Claude D. Carter, Chairman  
Botetourt County Democratic Committee

CDC/dl

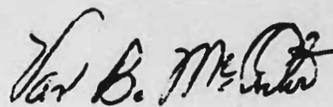
Executive Committee  
Galax City Democratic Party  
763 236-2248

December 21, 1980

Federal Election Commission  
Washington, D.C.

Dear Sir:

On behalf of the Galax Democratic Committee I hereby  
authorize Lawrence H. Framme III to represent this committee  
in connection with federal election complaints.



Van B. McCarter,  
Chairman

82040330353

Kents Store, Va.  
Dec. 23, 1980

Federal Election Commission,  
Washington, D.C.

To whom it may concern:

I, Nancy T. Bowles, Chairman of the Democratic Party of Goochland County authorize Lawrence H. Framme III to represent this committee before the Federal Election Commission.

*Nancy T. Bowles*

Nancy T. Bowles

Chairman

Democratic Committee of  
Goochland County

82040330354

HENRY COUNTY DEMOCRATIC  
EXECUTIVE COMMITTEE

January 7, 1981

Federal Election Commission  
Washington, D.C. 20463

Gentlemen:

I, F.E. Marsh, Jr., Chairman of the Henry County  
Democratic Executive Committee authorize Lawrence H.  
Framme, III to represent this committee before the  
Federal Election Commission.

Sincerely,

*F.E. Marsh, Jr.*  
F.E. Marsh, Jr.

32040330355

Route 1, Box 212 K  
Stanardsville, Va. 22973  
January 7, 1981

Mr. Charles N. Steele  
General Counsel  
Federal Election Commission  
Washington, D. C. 20463

MUR # 1328

I, Constance T. Dudley, Chairman of the Democratic Party of Greene County, Virginia authorize Lawrence H. Framme, III to represent this committee before the Federal Election Commission.

*Constance T. Dudley*  
Constance T. Dudley (Mrs.)  
Chairman, Greene County  
Democratic Committee

82040330356

# WARREN COUNTY DEMOCRATIC COMMITTEE

FRONT ROYAL, VIRGINIA 22630

1016 Virginia Avenue

January 6, 1981

Federal Election Commission

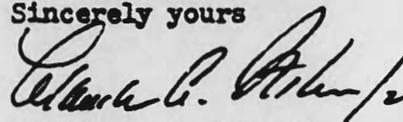
Washington, D.C.

Dear Sir:

This is to inform you that I, Claude A. Stokes, Jr., Chairman of The Warren County Democratic Committee, Front Royal, Virginia recieved the correspondence regarding advertisement during the Presidential Election and have authorized Attorney Lawrence H. Franme to represent the Warren County Committee.

With best regards, I am

Sincerely yours



Claude A. Stokes, Jr.  
Chairman

82040330357



Lawrence H. Frankel, III  
1400 Ross Building  
Richmond, Va. 23219



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

Attn: William Taylor, Esquire

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FEDERAL ELECTION COMMISSION  
1325 K Street, N.W.  
Washington, D.C. 20463

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL  
BY OGC TO THE COMMISSION 1-14-81

MUR # 1328  
DATE COMPLAINT RECEIVED  
BY OGC 10/30/80 and 12/10/80

STAFF MEMBER Taylor

COMPLAINANT'S NAME: Republican Party of Virginia  
RESPONDENT'S NAME: Amelia County Democratic Committee, et al.  
RELEVANT STATUTE: 2 U.S.C. §§ 441a(d), 441d  
INTERNAL REPORTS CHECKED: None  
FEDERAL AGENCIES CHECKED: None

SUMMARY OF ALLEGATIONS

The complainant, the Republican Party of Virginia, filed an "addendum" on December 15, 1980, to its complaint of October 30, 1980. This "addendum" recites the same facts as the original complaint, but adds fourteen (14) additional respondents. We have notified by letter the newly added respondents of the complaint filed against them, and as required, have enclosed in these letters a copy of both the complaint and the amendment to the complaint (the "addendum").

The respondents named in the original complaint of October 30, 1980, have replied, through counsel, to the allegations made against them. Because of the fact that the same allegations have been raised in the recently filed "addendum", it is the Office of General Counsel's recommendation that the "addendum" be treated as an amendment to the original complaint and the newly named respondents be given the statutory fifteen (15) days to respond; we recommend that the Commission forego any action against the original respondents until the newly named respondents have had an opportunity to respond.

Recommendation

1. The Commission forego making any finding in this matter until the newly added respondents have had the statutory 15-day opportunity to respond.

Attachments  
I. complaint  
II. amendment

81 JAN 14 P 5:13  
RECEIVED  
FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C.

02040330359

3190

000181 P1:19

**SEDAM & HERGE**

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

7800 OLD SPRINGHOUSE ROAD

MCLEAN, VIRGINIA 22102

(703) 521-1000

1700 PENNSYLVANIA AVENUE, N.W.

WASHINGTON, D.C. 20006

(202) 393-7124

TWX/TELEX 710-831-0896

CABLE: SEDAMHERGE

GLENN J. SEDAM, JR.  
J. CURTIS HERGE

ROBERT R. SPARKS, JR.  
MICHAEL D. HUGHES  
A. MARK CHRISTOPHER  
KAREN LUSSEN BLAIR  
JOHN ROBERT CLARK III  
J. STANLEY PAYNE, JR.

October 30, 1980

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

00C131 P2:05

CONFIDENTIAL

Dear Member of the Commission:

This letter constitutes a complaint filed on behalf of our client, the ~~Republican Party of Virginia~~, 110 East Grace Street, Richmond, Virginia 23219, a political committee as defined under 2 U.S.C. §431(c), against the Democratic County Committee of Rappahannock County, Virginia, Mr. A. H. Keyser, Chairman, Washington, Virginia 22747; Democratic County Committee of Amelia County, Virginia, Mr. Juan Whittington, Chairman, Route 4, Box 136, Amelia, Virginia 23002; and, the Democratic County Committee of Clarke County, Virginia, Mr. Lawrence White, Chairman, Battleton Drive, Berryville, Virginia 22611.

Attached hereto as Exhibit A is a copy of The Rappahannock News of Thursday, October 16, 1980. You will note that, on page 3, there is a two column advertisement advocating the election of Jimmy Carter as President. Please note that the advertisement bears a disclaimer, pursuant to 2 U.S.C. §441(d), which states that the advertisement was placed by authority of Edward Baily, Treasurer of the Rappahannock Democratic Party.

Upon information and belief, similar newspaper advertisements were published in local newspapers in Amelia and Clarke Counties, Virginia, by the respective Democratic County Committees in those localities.

32040330360

(H)

General Counsel  
Page Two  
October 30, 1980

that: 2 U.S.C. §441(a)(d)(1) states in applicable part,

"a national committee of a political party and a state committee of a political party, including any subordinate committee of a state committee may make expenditures in connection with the general election campaign of candidates for federal office..."

National party committees are limited by 2 U.S.C. §441(a)(d)(2), 11 CFR 110.7(a)(1) and (2), to "expenditures which do not exceed an amount equal to 2 cents multiplied by the voting age population of the United States..."

11 CFR 110.7(a)(4) states that:

"The National Committee of a political party may make expenditures authorized by this section through any agent, including state and subordinate party committees."

In AO 1980-87, the Federal Election Commission determined that the provisions of the Federal Election Campaign Act, and the Regulations promulgated by the Commission, which are cited above, restrict the activities of local party committees, so that expenditures for newspaper advertisements in support of presidential and vice presidential candidates can only be made if authorized and reported by the national committee.

The advertisement disclaimer implies that the advertisement was not paid for by the Democratic County Committees of Amelia, Clarke, and Rappahannock Counties as agents of the Democratic National Committee. If the Democratic National Committee neither authorized nor reported the expenditures for the newspaper advertisement, the expenditures were made in violation of the Federal Election Campaign Laws.

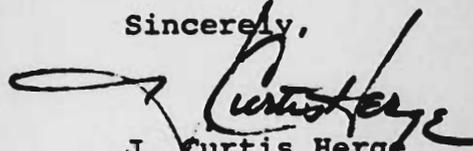
32040330361

(H)

General Counsel  
Page Two  
October 30, 1980

Your prompt attention to this complaint would be appreciated.

Sincerely,



J. Curtis Herg  
Counsel for the Republican  
Party of Virginia

Subscribed and sworn to  
before me this 30<sup>th</sup> day  
of October, 1980.

Winifred Rully  
Notary Public

My commission expires: 2/6/84

Attachment

(1)

82040330362

January 14, 1981

MEMORANDUM TO: Marjorie W. Emmons  
FROM: Elissa T. Garr  
SUBJECT: MUR 1328

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

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Amelia County Democratic ) MUR 1328  
Committee, et al. )

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on January 19, 1981, the Commission decided by a vote of 6-0 to forego making any finding in this matter until the newly added respondents have had the statutory 15 day opportunity to respond.

Commissioners Aikens, Harris, McGarry, Reiche, Thomson, and Tiernan voted affirmatively in this matter.

Attest:

1/21/81

Date

Marjorie W. Emmons  
Marjorie W. Emmons  
Secretary of the Commission

Received in Office of the Commission Secretary: 1-14-81, 4:13  
Circulated on 48 hour vote basis: 1-15-81, 4:00

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5 per cent compared with 1977-78. The group is primarily composed of young people and is open to all. Meetings are held on the first and third Thursdays of each month. For more information, contact J. Taylor at 434-4444.

ANS

we have Perryville's on raise loan taken needed

October 1. Emporium is Essex sponsor of the five

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### Spark Theatre

The next and other persons involved in the production of Gilbert and Sullivan's HMS Pinafore met recently to discuss the possibility of forming a local theatre group with special emphasis on an annual benefit performance for the Rappahannock County Library.

According to library board chairman Mary Jamison, the three night run of Pinafore on October 2, 3, and 4 cleared between \$1,300 and \$1,400 for the library.

A meeting has been set for Thursday, November 8, at 7:30 p.m. in the library. Anyone interested in joining the group or planning to make a contribution to the goals of local theatrical productions is invited to participate in this first organizational session.

### NAACP Meeting

The Rappahannock NAACP Branch will meet Monday, October 20, at 7:30 p.m. at the First Baptist Church dining hall in Washington. Important business will be discussed and all members are urged to attend.

### Christmas Mart

The annual Christmas Mart sponsored by the Manassas Art Guild is scheduled for November 15 and 16 at Lawn Acres and Antiques on Route 28 at Manassas. Hours are from 10 a.m. to 5 p.m. A splendid gathering of artists and craftsmen will display their unique talents for the viewing and shopping pleasure of all.

### Revue Tickets Available

Due to limited seating at the Mountain Magic Theater, those wishing to attend the 1980 Rappahannock All-Star Revue on Saturday, November 1, should purchase their tickets this week at Nature's Foods or Sursum Corda School in Washington, or at the Fire House Market in Warrenton. Tickets can also be reserved by calling the school at 675-3237, days.

Due to the sales and an unusually good line-up of talent, tickets may not be available at the door. The talent show is an annual event. Proceeds will



Rappahannock Youth Center/Teacher Students

CUB OLYMPIANS received a standing ovation at Friday's awards ceremony for their performance in recent regional games. Marc Wiley (left) won a first place ribbon in the 50 yard dash for ten-year-olds and Joey Eldred (center) won another first place ribbon for six-ups in the nine year old group. Eric Robinson (right) brought home a fathal of ribbons and the prestigious gold medal for overall achievement among eight-year-olds. The Rappahannock youngsters competed against teams from nine counties at the games.

**CHRISTMAS PORTRAITS**



Come in now... Before the holiday rush for your Gift Portraits. Nothing is a more treasured gift than a picture.

For An Appointment Call 825-1880

**ALAN'S PHOTOGRAPHY STUDIO**  
167 E. Davis St. Culpeper

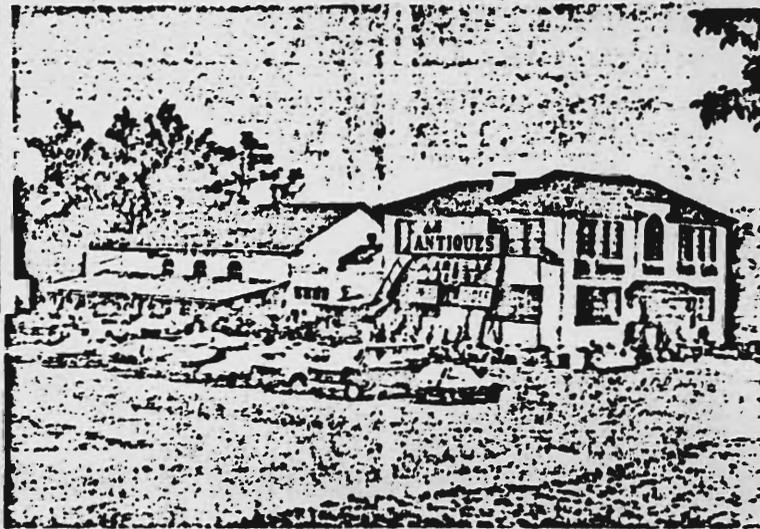
benefit the Building Fund of Sursum Corda School and Day Care Center, a non-profit corporation.

### Appreciation Service

An appreciation service for Ida Jackson who has served in the choir of Shiloh Baptist Church at Woodville for fifty years will be held Sunday, October 19, following the regular morning worship. The church expresses appreciation for her devoted service.

## Applebutter Boiling Saturday At That SPERRYVILLE EMPORIUM

Intersection Routes 311 and 523 in Sperryville



An old-fashioned applebutter boiling will be held Saturday, October 18

### A QUART OF HOMEMADE APPLEBUTTER

will be given FREE to anyone holding a ticket for the Annual House Tour and Dried Flower Sale.

Just show your ticket to a cashier at the Emporium and collect your free apple butter either day of the tour, Saturday or Sunday.

SUPPORT THE PRESIDENT

HE WORKS FOR YOU

High and Low

Black and White

Old and Young

VOTE CARTER NOV. 4th

By authority of Edward Bally Treas., Rapp'n Democratic Party

1 copy

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A PROFESSIONAL CORPORATION  
ATTORNEYS AT LAW  
7600 OLD SPRINGHOUSE ROAD  
MCLEAN, VIRGINIA 22108

(703) 821-1000

1700 PENNSYLVANIA AVENUE, N.W.  
WASHINGTON, D.C. 20006  
(202) 393-7124

TWX/TELEX: 710-631-0896

CABLE: SEDAMERGE

DEC 15 P12: 28

RECEIVED  
GENERAL COUNSEL

GLENN J. SEDAM, JR.  
J. CURTIS HERGE

ROBERT R. SPARKS, JR.  
MICHAEL D. HUGHES  
A. MARK CHRISTOPHER  
KAREN LUSSEN BLAIR  
JOHN ROBERT CLARK III  
J. STANLEY PAYNE, JR.

December 10, 1980

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

Dear Members of the Commission:

This letter constitutes an addendum to a complaint filed with the Commission on October 30, 1980, on behalf of our client, The Republican Party of Virginia, 115 East Grace Street, Richmond, Virginia 23219 against the Democratic County Committee of Rappahannock County, Virginia, the Democratic County Committee of Amelia County Virginia, and the Democratic County Committee of Clarke County Virginia.

The complaint of October 31, 1980 is hereby amended to include the following Committees:

1. The Democratic County Committee of Roanoke County, Virginia, Ms. Betty Ann Saunders, Chairman, 5134 Remington Road, S.W., Roanoke, Virginia 24014.
2. The Democratic County Committee of Greene County, Virginia, Ms. Constance Dudley, Chairman, Route 1, Box 221K, Stanardsville, Virginia 22973.
3. The Democratic County Committee of Orange County, Virginia, Mr. Watkins Ellerson, III, Chairman, Post Office Box 1080, Orange, Virginia 22960.
4. The Democratic County Committee of Gloucester County, Virginia, Mr. C. F. Hicks, Chairman, Gloucester, Virginia 23061.

3 2 0 4 0 3 3 0 3 6 6

(11)

5. The Democratic County Committee of Mathews County, Virginia, F. Paul Blanock, Chairman, Mathews, Virginia 23109.
6. The Democratic County Committee of Goochland County, Virginia, Mrs. Nancy Bowles, Chairman, Kents Store, Virginia 23084.
7. The Democratic County Committee of Lunenburg County, Virginia, Mr. James Edmunds, Chairman, Kenbridge, Virginia 23944.
8. The Democratic City Committee of Hopewell, Virginia, Ms. Hilda Traina, Chairman, 3408 Vinton Street, Hopewell, Virginia 23860.
9. The Democratic County Committee of Botetourt County, Virginia, Mr. Claude D. Carter, Chairman, Post Office Box 368, Daleville, Virginia 24083.
10. The Democratic County Committee of Henry County, Virginia, F. E. Marsh, Chairman, Main Street, Basset, Virginia 24055.
11. The Democratic City Committee of Martinsville, Virginia, Ms. Virginia Hall, Chairman, 1605 Mulberry Road, Martinsville, Virginia 24112.
12. The Democratic County Committee of Warren County, Virginia, Mr. Claude A. Stokes, Jr., Chairman, 1016 Virginia Avenue, Front Royal, Virginia 22630.
13. The Democratic City Committee of Galax, Virginia, Dr. Van B. McCarter, 212 West Center Street, Galax, Virginia 24333.
14. The Democratic County Committee of Grayson County, Virginia, Mr. Kenneth Broom, Route 1, Box 45, Fries, Virginia 24330.

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(11)

General Counsel  
Federal Election Commission  
Page Three  
December 10, 1980

Attached hereto as Exhibits A through N are copies of advertisements, advocating the election of Jimmy Carter, which appeared in the following newspapers. Each advertisement contains a disclaimer which states that one of the committees listed above paid for the advertisement:

- A. The Roanoke Times and World News of November 1, 1980;
- B. The Ameila Bulletin Monitor of October 30, 1980;
- C. The Green County Record of October 30, 1980;
- D. The Clarke County Courier of October 23, 1980;
- E. The Clarke County Courier of October 30, 1980;
- F. The Gloucester - Mathews Gazette Journal of October 30, 1980;
- G. The Goochland Gazette of October 30, 1980;
- H. The Kenbridge - Victoria Dispatch of October 30, 1980;
- I. The Fincastle Herald of October 30, 1980;
- J. The Progress Index of October 30, 1980;
- K. The Martinsville Bulletin of November 2, 1980;
- L. The Martinsville Bulletin of November 3, 1980;
- M. The Front Royal-Warren Sentinel of October 30, 1980;
- N. The Galax Gazette of October 31, 1980.

that: 2 U.S.C. §441(a)(d)(1) states in applicable part,

8 2 0 4 0 3 3 0 3 6 8



General Counsel  
Federal Election Commission  
Page Four  
December 10, 1980

"a national committee of a political party and a state committee of a political party, including any subordinate committee of a state committee may make expenditures in connection with the general election campaign of candidates for federal office..."

National party committees are limited by 2 U.S.C. §441 (a)(d)(2), 11 CFR 110.7(a)(1) and (2), to "expenditures which do not exceed an amount equal to 2 cents multiplied by the voting age population of the United States..."

11 CFR 110.7(a)(4) states that:

"The National Committee of a political party may make expenditures authorized by this section through any agent, including state and subordinate party committees."

In AO 1980-87, the Federal Election Commission determined that the provisions of the Federal Election Campaign Act, and the Regulations promulgated by the Commission which are cited above, restrict the activities of local party committees, so that expenditures for newspaper advertisements in support of presidential and vice presidential candidates can only be made if authorized and reported by the national committee.

The disclaimers which appear on the advertisements imply that the advertisements were not paid for by the various Democratic City and County Committees as agents of the Democratic National Committees. If the Democratic National Committee neither authorized nor reported the expenditures for the newspaper advertisements, the expenditures were made in violation of the Federal Election Campaign Laws.

11 CFR §110.11(a)(1) states that any disclaimer:

"...shall be presented in a clear and conspicuous manner to give the reader, observer or listner

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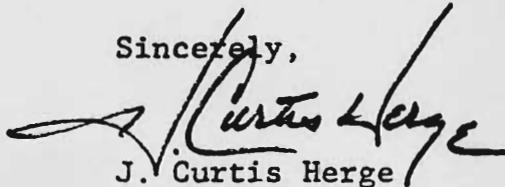
General Counsel  
Federal Election Commission  
Page Five  
December 10, 1980

adequate notice of the identity of persons who  
paid for or who authorized the communication..."

If the Democratic National Committee did authorize  
and report the expenditures for the attached advertisements,  
then the disclaimers which appeared on the advertisements  
did not comply with 11 CFR 110.11(a)(1) as said disclaimers  
do not give the reader adequate notice that the Democratic  
National Committee paid for and authorize the attached  
advertisements.

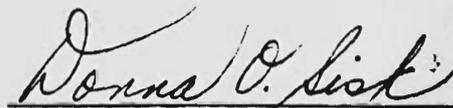
Your prompt attention to this addendum would be  
appreciated.

Sincerely,



J. Curtis Herge  
Counsel for the Republican  
Party of Virginia

Subscribed and sworn to me this 10<sup>th</sup> day of  
December, 1980.

  
\_\_\_\_\_  
Notary Public

My Commission Expires:

May 15, 1984

Attachments

(4)

82040330370

11

(Paid Political Adv.)

# VOTE FOR A SECURE FUTURE!

## ELECT

### DEMOCRATIC CANDIDATES:

- ★ Jimmy Carter for President
- ★ Walter Mondale for Vice-President
- ★ Donald S. Caldwell, for Commonwealth Atty.
- ★ Gary Minter, Hollins District Supervisor

**For Rides To The Polls**

# PHONE: 981-0273

**in Salem 389-3787**

by authority of Prentis Webb, Treasurer  
Roanoke City Democratic Committee

3 2 0 4 0 3 3 0 3 7 1

CAR-RT  
BULK RATE  
U.S. POSTAGE  
PAID  
Permit No. 8  
Amelia, C.M., Va. 23002

# THE AMELIA BULLETIN MONITOR

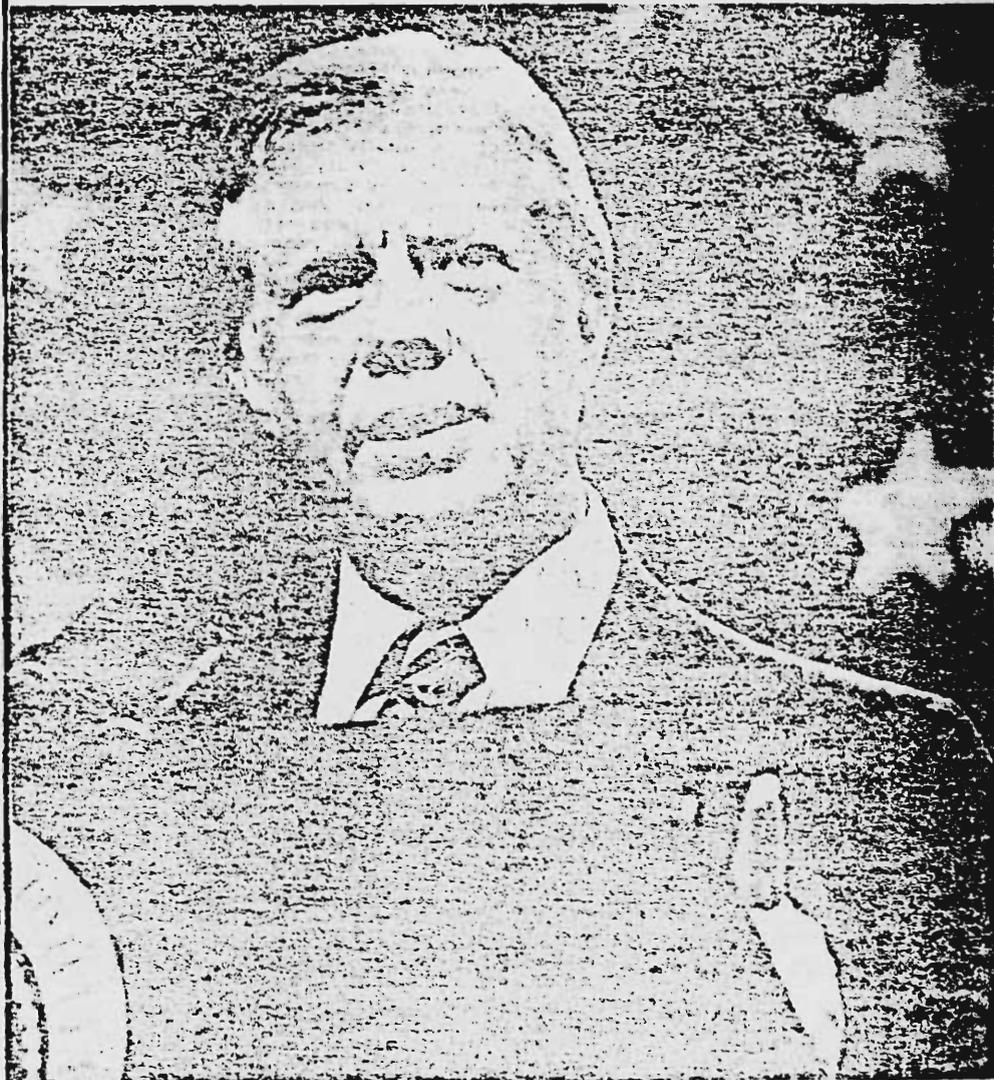
"Serving Every Household In Amelia County"

VOL VIII, NO. 33

THURSDAY, OCTOBER 30, 1980

AMELIA COURT HOUSE, VIRGINIA 23002

## President Carter



Election Day is  
Tuesday, November 4th

Paid for by Amelia County Democratic Party  
Ruby F. Arrington, Treasurer

3 2 0 4 0 3 3 0 3 7 2

(11)



# The **RECORD**

GREENE COUNTY



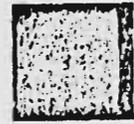
Published every Thursday morning

STANARDSVILLE, VIRGINIA 22973 THURSDAY, OCTOBER 30, 1980

15 cents a copy

VOLUME LXX NUMBER 44

## **Carter / Mondale**



# VOTE

Democratic on Tuesday

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(17)



VOL. CXI. NO. 36 AWARDS WINNING NEWSPAPER BERRYVILLE, VA. OCTOBER 23, 1980 ONE SECTION 30 CENTS PER COPY

**VOTE DEMOCRATIC**

**Jimmy Carter**

**Nov. 4th**

By authority of Lawrence W. White, Jr., Chairman, Clarke Co. Demo. Comm.

EXHIBIT D

# CLARKE THE COURIER



CXI. NO. 37 AWARDS WINNING NEWSPAPER BERRYVILLE, VA. OCTOBER 30, 1980 ONE SECTION 30 CENTS PER COPY

3 2 0 4 0 3 3 0 6 7 5

## VOTE

# Jimmy Carter Walter Mondale DEMOCRATS

By authority of Lawrence W. White, Jr., Chairman, Clarke County Democratic Committee

EXHIBIT E

(11)

(PAID ADVERTISEMENT)

### What is the unknown record of the Carter Administration?

It can be summed up in one word: progress. The kind of progress that comes from hard, steady work. The kind of progress that doesn't always make headlines. The kind of progress that honors the Carter commitment to America and points us in the direction of the best future.

You may be surprised when you discover how much President Carter has accomplished—and in only 3-1/2 years! Take a look at just a few of his achievements:

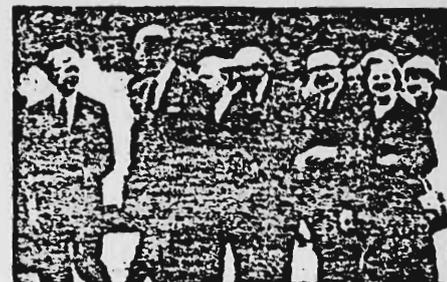
- Created 8-1/2 million new jobs in the economy—a greater increase than in any comparable period in our history.
- Had four of every five bills sent to Congress passed—a record every bit as impressive as Lyndon Johnson's and John Kennedy's.
- Won enactment of America's first comprehensive energy plan—a plan that will make America less dependent on foreign oil and more secure in the future.
- Passed the Windfall Profits Tax—a tax which takes unearned profits from the big oil companies and gives the money to those who cannot afford to heat their homes.
- Hammered out the Middle East Peace Treaty between Israel and Egypt—a framework for peace in the future.
- Appointed more women to his Cabinet than any other President in history.
- Appointed more Blacks, Hispanics, and other minorities to judicial positions than all other presidents combined.
- Saved the Social Security system from certain bankruptcy.
- Reduced the Federal work force by over 20,000 employees—the first reduction in its size since the 1920s.
- Deregulated the airline and trucking industries, saving consumers millions of dollars.
- Increased federal support for education by 70%.

With a record like this, President Carter and Vice President Mondale have earned their second term. Re-elect President Carter on November 4th. Keep him working for your future.

## Re-Elect President Carter and Vice President Mondale



### A Tested and Trustworthy Team. Vote Democratic Nov. 4



President Carter's strong leadership at the European Summit led to the establishment of a worldwide energy conservation policy, and to the enactment of strong measures to counter the Soviet invasion of Afghanistan.



Each year in office, President Carter has increased expenditures for national defense.



President Carter speaks honestly and openly to the people of the United States at frequent town meetings.



Authorized by the Carter/Mondale Re-Election Committee, Inc.  
Robert S. Strauss, Chairman

# Gloucester County Democratic Committee

C.F. Hicks, Chairman

# Mathews County Democratic Committee

F. Paul Blanock, Chairman

(This advertisement paid for by the Gloucester County Democratic Committee, the Mathews County Democratic Committee and the Democratic National Committee)

(11)

# "A TESTED AND TRUSTWORTHY TEAM"

**PRESIDENT**  
**Jimmy**  
**Carter**



**VICE**  
**PRESIDENT**  
**Walter**  
**Mondale**

*Take a minute to read the Real Carter record!*

- Created 8-1/2 million new jobs in the economy—a greater increase than in any comparable period in our history.
  - Had four of every five bills sent to Congress passed—a record every bit as impressive as Lyndon Johnson's and John Kennedy's.
  - Won enactment of America's first comprehensive energy plan—a plan that will make America less dependent on foreign oil and more secure in the future.
  - Passed the Windfall Profits Tax—a tax which takes unearned profits from the big oil companies and gives the money to those who cannot afford to heat their homes.
  - Hammered out the Middle East Peace Treaty between Israel and Egypt—a framework for peace in the future.
  - Appointed more women to his Cabinet than any other President in history.
  - Appointed more Blacks, Hispanics, and other minorities to judicial positions than all other presidents combined.
  - Saved the Social Security system from certain bankruptcy.
  - Reduced the Federal work force by over 20,000 employees—the first reduction in its size since the 1920's.
  - Deregulated the airline and trucking industries, saving consumers millions of dollars.
  - Increased federal support for education by 70%.
- With a record like this, President Carter and Vice President Mondale have earned their second term. Re-elect President Carter on November 4th. Keep him working for your future.

**On Tuesday, Nov. 4th, Vote Carter-Mondale  
For Goochland-For Virginia**

**FOR AMERICA!**

Paid for by the Democratic Committee of Goochland County  
Nancy T. Bowles, Chairman

8 2 0 4 0 3 3 0 5 7 7

(II)

(F) (Paid Political Advertisement)

## Small Town America Can Depend On Jimmy Carter



*A President  
From Rural America  
And  
For Rural America*

# Jimmy Carter Is A Democrat Who Understands Farm Families And Rural Problems

### HE ADVOCATES:

1. Price support and acreage allotment for tobacco;
2. High base price supports for dairy farms;
3. Protection of beef cattle farmers from imports;
4. Development of export markets to maintain reasonable grain prices.

In Virginia, NET farm income increased 71% from \$220 million in 1976 to \$375 million in 1979.

Virginia's share of total US exports has increased dramatically from 1976 to 1979. Farmers Home Administration loans for business and industry in rural areas have increased 235% since 1977 and farm operating and ownership loans have increased 102%.

# VOTE CARTER NOVEMBER 4

THE BOTETOURT COUNTY NEWS  
and  
THE FINCASTLE HERALD

Botetourt's ALL COUNTY Newspaper--Established 1866--Our 114th Year Of Service

VOLUME 114 NUMBER 44 HOME NEWS EVERY WEEK FINCASTLE, VIRGINIA 24000 TWENTY CENTS PER COPY THURSDAY, OCTOBER 26, 1980

82040330379

The Democratic Committee  
Urges All Voters In Botetourt County



To  
Vote On Tuesday  
November 4th  
For  
Experience And  
Intelligence  
Re-Elect  
President Carter  
And  
V-Pres. Mondale

Paid for by the authority of Shirley Stuckey, treasurer of  
the Botetourt County Democratic Committee.

EXHIBIT I

(II)

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FD

**The Weather**

Mostly clear and a little warmer tonight. With the warming trend, there is a chance of showers tomorrow. See details on page 2.

Classified Ads 732-3456

# The Progress-Index

Serving Petersburg, Colonial Heights, Hopewell, Va., And Surrounding Counties



**Day 366**

Free Our Hostages

Home Delivery 732-1123

Vol. 116—No. 122

Monday, November 3, 1980

(USPS 447-080)

One Section—14 Pages

Price 25 Cents

(Paid Political Advertisement)

## VOTE and RE-ELECT President Carter and Vice President Mondale.

A tested and trustworthy team.



### A RECORD OF ACHIEVEMENT.

- Concern for senior citizens, health and quality of life
- More than 8 1/2 million new jobs
- Increased the nation's commitment to strong national defense
- Defender of human rights and a leader as a peacemaker
- Reorganization and better management of federal government
- Appointed more Blacks, Hispanics and other minorities to government positions, boards and commissions
- Reduced gasoline consumption by 12%, achieved passage of the Windfall Profits Tax

PHONE 488-4394 FOR TRANSPORTATION TO THE POLLS

Paid for and authorized by the Hopewell Democratic Committee,  
John Horvath, Treasurer.

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(A)

MARTINSVILLE, VIRGINIA  
SUNDAY, NOVEMBER 2, 1980  
VOLUME 91, NO. 243  
PRICE THIRTY-FIVE CENTS

# MARTINSVILLE BULLETIN

**CARTER**

★ for President ★



... In 1976 Jimmy Carter  
Carried Martinsville & Henry County  
.. do Your Part Toward A  
Better Tomorrow ...  
**Continue To Vote  
Democratic!!**

EXHIBIT K

8 2 0 4 0 3 3 0 3 8 2

# MARTINSVILLE BULLETIN

MARTINSVILLE, VIRGINIA  
FRIDAY, NOVEMBER 3, 1980  
VOLUME 61, NO. 264  
PRICE TWENTY CENTS

**x CARTER x**

**★ for President ★**



**... In 1976 Jimmy Carter  
Carried Martinsville & Henry County  
.. do Your Part Toward A  
Better Tomorrow ...**

**Continue To Vote  
Democratic!!**

EXHIBIT L

Since 1869

# Sentinel

111th YEAR NO. 30 • THURSDAY, OCTOBER 30, 1980 • 15 CENTS

Folks.....	11
South Warren	
Apple Butter.....	12
'Wild' Recipes.....	13

FAB POL. ADV.

VOTE

TUESDAY NOVEMBER 4, 1980

**DEMOCRATIC PARTY**  
**JIMMY CARTER, PRESIDENT**  
**WALTER F. MONDALE, VICE PRES.**

APPLICANTS FOR ABSENTEE BALLOTS MUST BE FILED NO LATER THAN 5 PM SATURDAY, NOVEMBER 1

IF YOU NEED TRANSPORTATION TO THE POLLS ON ELECTION DAY CALL CARTER-MONDALE HEADQUARTERS

636-1638

BY AUTHORITY OF: FRANCES COVERSTONE, TREAS.  
WARREN COUNTY DEMOCRATIC COMMITTEE

Re-Elect  
**President Carter**  
 and  
**Vice President Mondale**



A tested and  
 Trustworthy Team  
 Note Democratic Nov 4

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EXHIBIT M

(H)

8 2 0 4 0 3 3 0 3 8 4

*Blue Devils remain  
in championship chase*

Sports--Page 2A

INSIDE TODAY

Sports .....	2A, 3A	School News .....	1AA
Classified .....	4A, 5A	About People .....	2AA
Obituaries .....	7A	Ann Landers .....	2AA
What's Happening .....	8A	Horoscope .....	3AA
Movie Guide .....	8A	School menus .....	4AA

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VALENT, DOUGLAS S.  
P.O. BOX 227  
GALAX, VA. 24333

12-30-80

FRIDAY

# The Gazette

"To Give the News Impartially Without Fear or Favor"

October 31, 1980

Serving the City of Galax, Carroll and Grayson Counties

103rd Year - No. 130

**For Continued  
Peace and Progress**

**VOTE**

**CARTER/MONDALE**

**Tuesday, Nov. 4th.**



**Re-Elect President Carter  
and Vice President Mondale.  
The Democrats.  
For a better tomorrow.**

Paid For By Authority of Ruthie Alderman Treasurer  
Galax Democratic Committee & Rex Farmer, Treasurer  
Grayson Democratic Committee

**Therefore May Spark Theatre**

The new and other groups formed in the production of Spark Theatre... The group is currently working on a play... The group is currently working on a play... The group is currently working on a play...

NAACP Meeting  
The Republican NAACP Branch will meet Monday, October 26, at 7:30 p.m. at the First Baptist Church...

Christmas Mass  
The annual Christmas Mass sponsored by the St. Michael's Art Guild is scheduled for November 25 and 16 at Love Annex and Shrine on Route 26...

Reverse Tickets Available  
Due to limited seating at the Mountain State Theatre... Tickets are available for the evening... Tickets are available for the evening...



CUB OLYMPIANS received a standing ovation at Friday's awards ceremony for their performance in recent regional games. Marc W. Byrd (left) won a blue glass ribbon in the 50 yard dash for ten-year-olds and Jerry Clark (center) won another blue glass ribbon for 40-49 in the nine year old group. Eric Robinson (right) brought home a basket of ribbons and the precious gold medal for overall achievement during eight events. The Republican pressmen captured photos from the ceremonies at the games.

**CHRISTMAS PORTRAITS**

Come in now... Before the holiday rush for your Christmas portraits nothing is as more treasured gift than a picture.

For An Appointment Call 625-1880

**ALAN'S PHOTOGRAPHY STUDIO**  
167 E. Davis St. Colchester

**Applebutter Boiling Saturday At That SPERRYVILLE EMPORIUM**  
Insurance Routes 211 and 522 in Sperryville

An old-fashioned applebutter boiling will be held Saturday, October 18

**A QUART OF HOMEMADE APPLEBUTTER** will be given FREE to anyone holding a ticket for the Annual House Tour and Dried Flower Sale.

Just show your ticket to a cashier at the Emporium and collect your free apple butter either day of the tour. Saturday or Sunday.

**SUPPORT THE PRESIDENT**

**HE WORKS FOR YOU**

**High and Low**

**Black and White**

**Old and Young**

**VOTE CARTER NOV. 4th**

By authority of Edward Barry, Treasurer, Rapp's Democratic Party

82040330385

Handwritten initials or signature.



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

January 5, 1981

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Paul Harris  
Chairman of the Lee County  
Democratic County Committee  
P. O. Box 404  
Jonesville, Virginia 24263

Re: MUR 1358(80)

Dear Mr. Harris:

This letter is to notify you that on December 24, 1980, the Federal Election Commission received a complaint which alleged that your committee has violated certain sections 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 1358. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate, in writing, that no action should be taken against your committee in connection with this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

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.

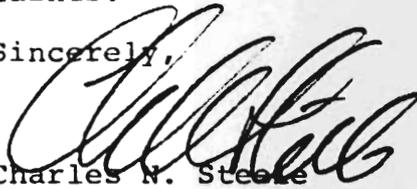
This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

82040330386

If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

If you have any questions, please contact William Taylor, the attorney assigned to this matter at 202-523-4529. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

  
Charles N. Steele  
General Counsel

Enclosures

1. Complaint
2. Procedures

82040330387

1359

CONSULE POSTALAGE	
ARTICLE ADDRESSED TO	Paul Harris
ARTICLE DESCRIPTION	
REGISTERED NO.	947675
ISSUED NO.	
Always attach duplicate of address of sender	
I have received the article described above.	
Signature	Charles N. Steele
Date	7-16-76
RECEIVED	
81 JAN 18	

RETURN RECEIPT, RETURNED.



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

January 5, 1981

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

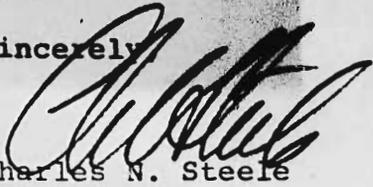
J. Curtis Herge  
Sedam & Herge  
7600 Old Springhouse Road  
McLean, Virginia 22102

Dear Mr. Herge:

This letter is to acknowledge receipt of your complaint of December 22, 1980, on behalf of Republican Party of Virginia against Democratic County Committee of Lee County, Virginia which alleges violations of the Federal Election Campaign laws. A staff member has been assigned to analyze your allegations. The respondent(s) will be notified of this complaint within 5 days and a recommendation to the Federal Election Commission as to how this matter should be initially handled will be made 15 days after the respondent's notification.

You will be notified as soon as the Commission takes final action on your complaint. Should you have or receive any additional information in this matter, please forward it to this office. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,



Charles N. Steele  
General Counsel

Enclosure

82040330389



1958 *July 10*

**REMARKS:** Complete items 1, 2, and 3. Add your address in the "RETURN TO" section.

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:  
*J. Curtis Harge*

3. ARTICLE DESCRIPTION:  
REGISTERED NO. | CERTIFIED NO. |  
| *947674* |

(Always obtain signature of addressee or agent.)

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

*H. D. Young*

4. DATE OF DELIVERY  
*7/7/58*

5. ADDRESS CORRECTED ONLY IF REQUESTED

6. UNABLE TO DELIVER BECAUSE:

★CPG: 1958-10-1

MUR # 1351

DATE 12-30-80

PLEASE PROVIDE THE NAMES AND ADDRESSES OF ALL RESPONDENTS WHICH ARE TO BE SENT A COPY OF THE COMPLAINT. IF A PRINCIPAL CAMPAIGN COMMITTEE IS A RESPONDENT, A CARBON COPY IS TO BE SENT TO THE CANDIDATE. PLEASE PROVIDE THE NAME AND ADDRESS OF THE CANDIDATE AND PUT A "CC" BESIDE THE CANDIDATE'S NAME. IF A CANDIDATE IS A RESPONDENT, A CARBON COPY IS TO BE SENT TO THE CANDIDATE'S PRINCIPAL CAMPAIGN COMMITTEE. PLEASE PROVIDE THE NAME AND ADDRESS OF THE PRINCIPAL CAMPAIGN COMMITTEE AND PUT A "CC" BESIDE THE COMMITTEE'S NAME. PLEASE PROVIDE THIS INFORMATION, ON THIS SHEET, WITHIN 24 HOURS OF RECEIPT OF THIS NOTICE. THANK YOU.

82040330390

*Mr. Paul Harris  
Chairman of the Lee County  
Democratic County  
Committee  
PO Box 404  
Jonsville VA 24263*



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

December 31, 1980

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mrs. Betty Ann Saunders, Chairman  
The Democratic County Committee  
for Mathews County, Virginia  
5134 Remington Road, S.W.  
Roanoke, Virginia 24014

MUR # 1328

Dear Mrs. Saunders:

This letter is to notify you that on December 15, 1980, the Federal Election Commission received an addendum to a complaint filed with the Commission on October 31, 1980. The complaint, with its addendum, alleges that your committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431, et seq. ("The Act"). A copy of the complaint and addendum is enclosed. We have numbered this matter MUR 1328. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate, in writing, that no action should be taken against your committee in connection with this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

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.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

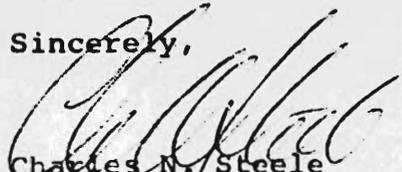
3 2 0 4 0 3 3 0 3 9 1

Letter to Mrs. Betty Ann Saunders  
Page two

If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel to receive any notifications and other communications with the Commission.

If you have any questions, please contact William Taylor, the attorney assigned to this matter, at (202) 523-4529. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

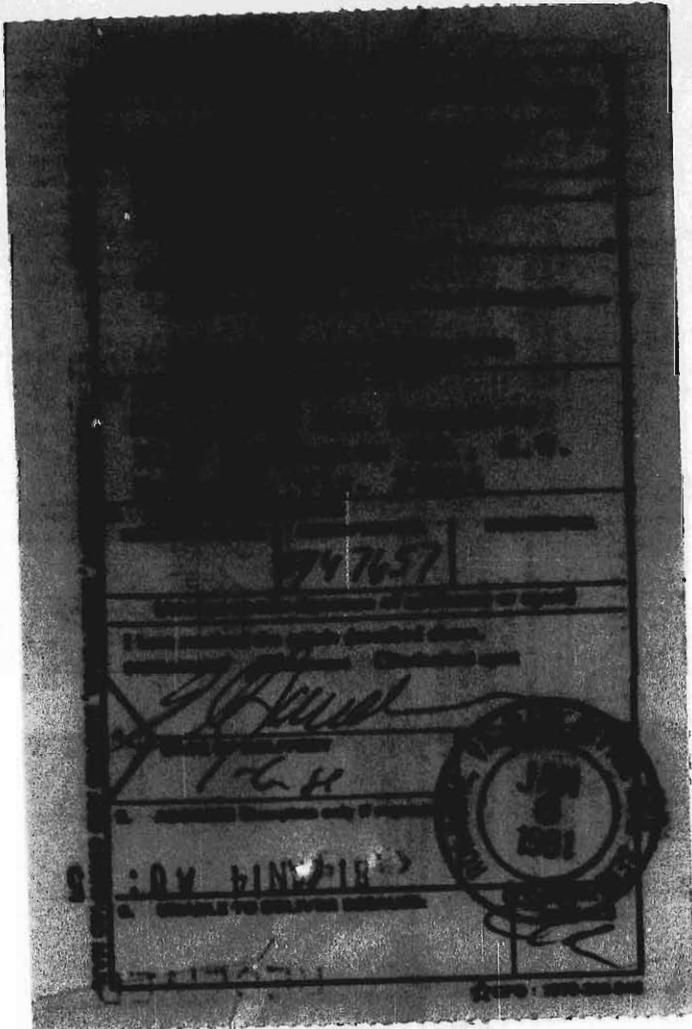
Sincerely,

  
Charles N. Steele  
General Counsel

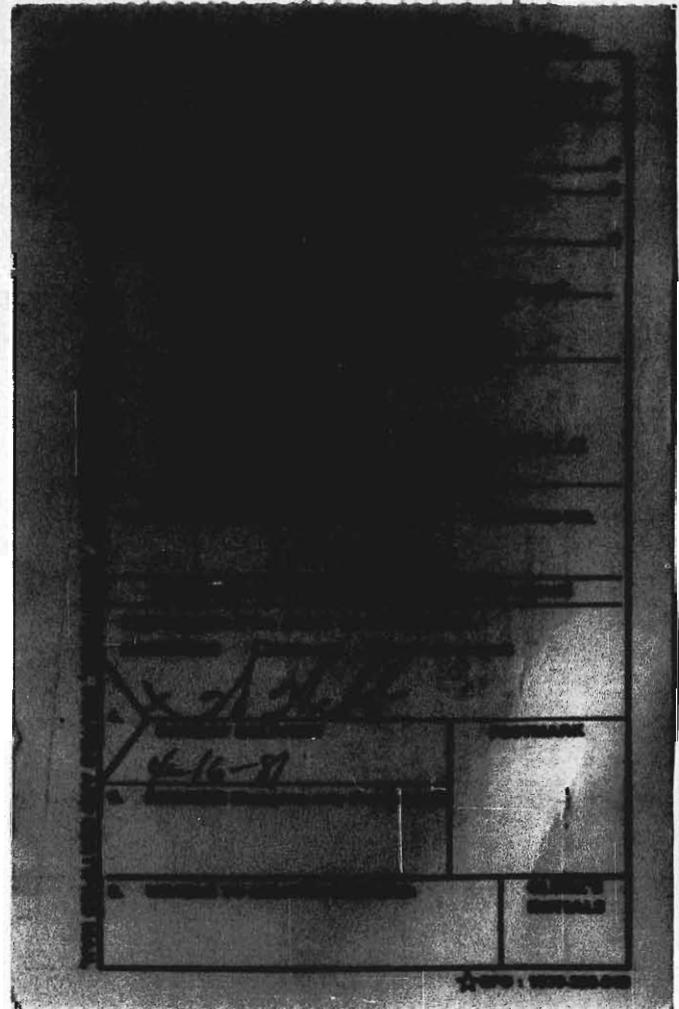
Enclosure

1. Complaint
2. Addendum
3. Procedures

2040330592



A faded document with a circular seal at the bottom right. The seal contains the text "JAN 1981". There is a handwritten number "797657" at the top. The document appears to be a form or a letter with various fields and lines.



A faded document with a grid-like structure. It contains several rows and columns, with some handwritten text and numbers. The document appears to be a form or a letter with various fields and lines.



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

December 31, 1980

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Watkins Ellerson, III, Chairman  
The Democratic County Committee of  
Orange County, Virginia  
Post Office Box 1080,  
Orange, Virginia 22960

MUR # 1328

Dear Mr. Ellerson:

This letter is to notify you that on December 15, 1980, the Federal Election Commission received an addendum to a complaint filed with the Commission on October 31, 1980. The complaint, with it addendum, alleges that your committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431, et seq. ("The Act"). A copy of the complaint and addendum is enclosed. We have numbered this matter MUR 1328. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate, in writing, that no action should be taken against your committee in connection with this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

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.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

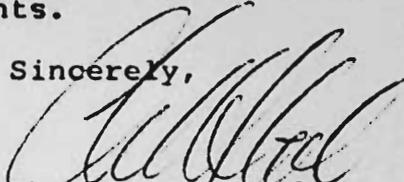
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Letter to Mr. Watkins Ellerson  
Page two

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Sincerely,



Charles N. Steele  
General Counsel

Enclosure

1. Complaint
2. Addendum
3. Procedures

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

December 31, 1980

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Virginia, F. E. Marsh, Chairman  
The Democratic County Committee of  
Henry County, Virginia  
Main Street,  
Basset, Virginia 24055

MUR # 1328

Dear Ms. Marsh:

This letter is to notify you that on December 15, 1980, the Federal Election Commission received an addendum to a complaint filed with the Commission on October 31, 1980. The complaint, with its addendum, alleges that your committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431, et seq. ("The Act"). A copy of the complaint and addendum is enclosed. We have numbered this matter MUR 1328. Please refer to this number in all future correspondence.

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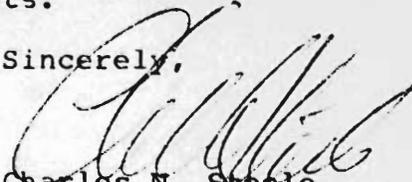
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Letter to Virginia, F. E. Marsh  
Page two

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Sincerely,



Charles N. Steele  
General Counsel

Enclosure

1. Complaint
2. Addendum
3. Procedures

8 2 0 4 0 3 3 0 3 9 6

TO: Virginia, F. E. Marsh Main Street Roanoke, Vir. 24055		
ZIP CODE	47659	
I have received the article described above. Signature: <i>F. E. Marsh, Jr.</i>		
DATE OF DELIVERY		ETC VA MAY 1981
UNABLE TO DELIVER		INITIALS <i>MK</i>



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

December 31, 1980

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

F. Paul Blanock, Chairman,  
The Democratic County Committee of  
Mathews County, Virginia  
Mathews, Virginia 23109

MUR # 1328

Dear Mr. Blanock:

This letter is to notify you that on December 15, 1980, the Federal Election Commission received an addendum to a complaint filed with the Commission on October 31, 1980. The complaint, with its addendum, alleges that your committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431, et seq. ("The Act"). A copy of the complaint and addendum is enclosed. We have numbered this matter MUR 1328. Please refer to this number in all future correspondence.

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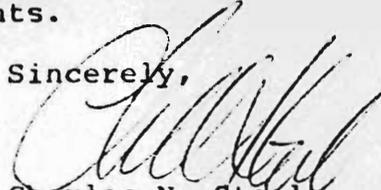
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Letter to F. Paul Blanock  
Page two

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Sincerely,

  
Charles N. Steele  
General Counsel

Enclosure

1. Complaint
2. Addendum
3. Procedures

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800 1300

TO: F. Paul Blanock  
Sen. Co. Com. of Mathews  
Mathews, Virginia 23108

ARTICLE DESCRIPTION  
QUANTITY  
797660

I have received the article described above.  
DATE OF DELIVERY  
1-5-81

UNABLE TO DELIVER BECAUSE

JAN 5 1981



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

December 31, 1980

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. C.F. Hicks, Chairman  
The Democratic County Committee of  
Glouster County, Virginia,  
Glouster, Virginia 23061

MUR # 1328

Dear Mr. Hicks:

This letter is to notify you that on December 15, 1980, the Federal Election Commission received an addendum to a complaint filed with the Commission on October 31, 1980. The complaint, with its addendum, alleges that your committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431, et seq. ("The Act"). A copy of the complaint and addendum is enclosed. We have numbered this matter MUR 1328. Please refer to this number in all future correspondence.

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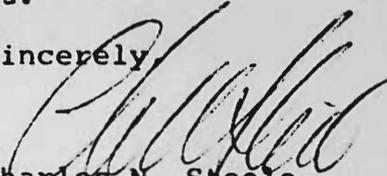
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Letter to Mr. C.F. Hicks  
Page two

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Sincerely,



Charles N. Steele  
General Counsel

Enclosure

1. Complaint
2. Addendum
3. Procedures

82040330100



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

December 31, 1980

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. James Edmunds, Chairman  
The Democratic County Committee  
of Lunenburg County, Virginia  
Kenbridge, Virginia 23944

MUR # 1328

Dear Mr. Edmunds:

This letter is to notify you that on December 15, 1980, the Federal Election Commission received an addendum to a complaint filed with the Commission on October 31, 1980. The complaint, with its addendum, alleges that your committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431, et seq. ("The Act"). A copy of the complaint and addendum is enclosed. We have numbered this matter MUR 1328. Please refer to this number in all future correspondence.

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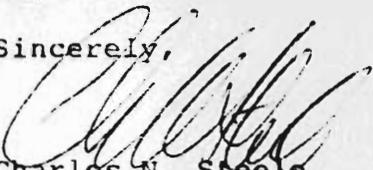
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Letter to Mr. James Edmunds  
Page two

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Sincerely,

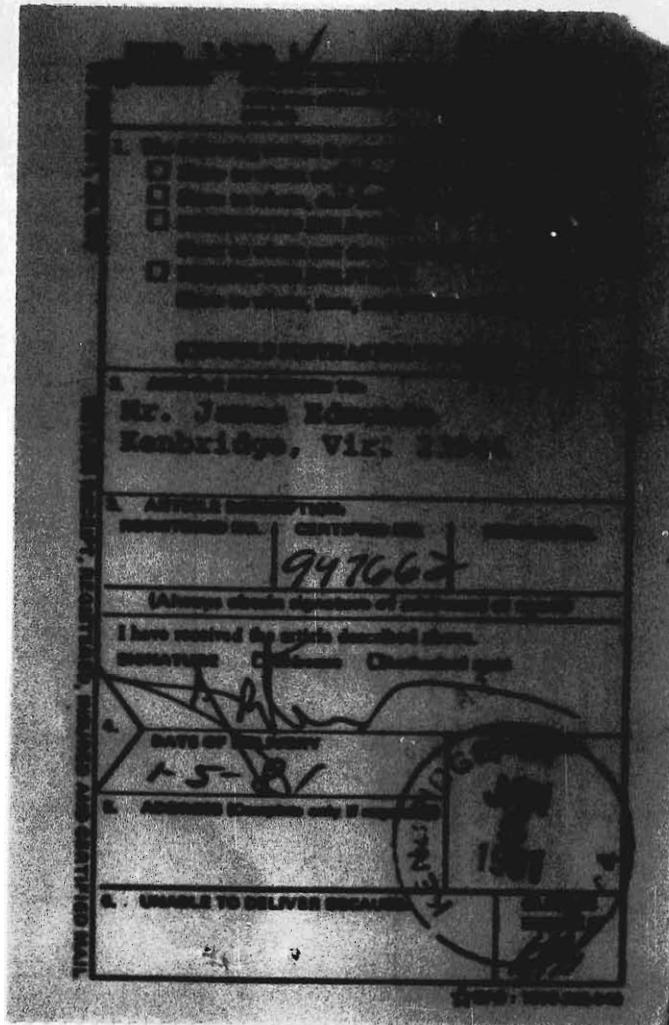


Charles N. Steele  
General Counsel

Enclosure

1. Complaint
2. Addendum
3. Procedures

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ARTICLE DESCRIPTION

RECEIVED NO. 997662

CERTIFICATE NO.

DATE OF DELIVERY 1-5-81

UNABLE TO DELIVER BECAUSE



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 31, 1980

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mrs. Nancy Bowles, Chairman  
The Democratic County Committee of  
Goochland County, Virginia  
Kents Store, Virginia 23084

MUR # 1328

Dear Mrs. Bowles:

This letter is to notify you that on December 15, 1980, the Federal Election Commission received an addendum to a complaint filed with the Commission on October 31, 1980. The complaint, with its addendum, alleges that your committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431, et seq. ("The Act"). A copy of the complaint and addendum is enclosed. We have numbered this matter MUR 1328. Please refer to this number in all future correspondence.

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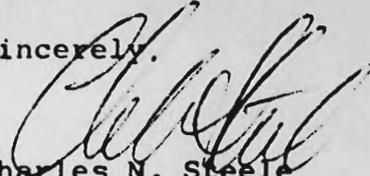
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Letter to Mrs. Nancy Bowles  
Page two

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Sincerely,



Charles N. Steele  
General Counsel

Enclosure

1. Complaint
2. Addendum
3. Procedures

82040330404



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

December 31, 1980

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Ms. Constance Dudley, Chairman,  
The Democratic County Committee  
of Greene County, Virginia  
Route 1, Box 221K,  
Stanardsville, Virginia 22973

MUR # 1328

Dear Ms. Dudley:

This letter is to notify you that on December 15, 1980, the Federal Election Commission received an addendum to a complaint filed with the Commission on October 31, 1980. The complaint, with its addendum, alleges that your committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431, *et seq.* ("The Act"). A copy of the complaint and addendum is enclosed. We have numbered this matter MUR 1328. Please refer to this number in all future correspondence.

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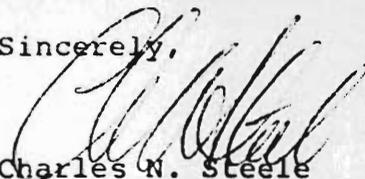
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Letter to Ms. Constance Dudley  
Page two

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Sincerely,



Charles N. Steele  
General Counsel

Enclosure

1. Complaint
2. Addendum
3. Procedures

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MR 1329

Registered Mail  
 Registered Mail - Restricted  
 Registered Mail - Return Receipt  
 Registered Mail - Return Receipt and Signature Confirmation

1. ADDRESSEE'S NAME  
Ms. Constance Dudley  
Route 1, Box 122  
Stammdenville, Pa.

2. ADDRESS  
047664

(Always attach duplicate of this form to the article)

I have received the article described above.  
Signature: Constance Dudley  
*Constance Dudley*

DATE OF DELIVERY  
1-6-80

3. ADDRESS COMPLETE ONLY IF NECESSARY

4. UNABLE TO DELIVER REASON

5. RETURN TO SENDER

6. RETURN TO ADDRESSEE

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

December 31, 1980

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Ms. Virginia Hall, Chairman,  
The Democratic County Committee of  
Martinsville, Virginia  
1604 Mulberry Road,  
Martinsburg, Virginia 24112

MUR # 1328

Dear Ms. Hall:

This letter is to notify you that on December 15, 1980, the Federal Election Commission received an addendum to a complaint filed with the Commission on October 31, 1980. The complaint, with its addendum, alleges that your committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431, et seq. ("The Act"). A copy of the complaint and addendum is enclosed. We have numbered this matter MUR 1328. Please refer to this number in all future correspondence.

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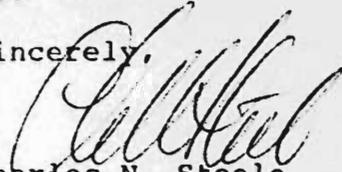
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Letter to Ms. Virginia Hall  
Page two

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Sincerely,



Charles N. Steele  
General Counsel

Enclosure

1. Complaint
2. Addendum
3. Procedures

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RECEIVED

Ms. Virginia Hall  
1604 Mulberry Rd.  
Martinsburg, Vir. 24112

947665

Virginia Hall

USPO



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

December 31, 1980

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Claude D. Carter, Chairman  
The Democratic County Committee of  
Botetourt County, Virginia  
Post Office Box 368,  
Dalesville, Virginia 24083

MUR # 1328

Dear Mr. Carter:

This letter is to notify you that on December 15, 1980, the Federal Election Commission received an addendum to a complaint filed with the Commission on October 31, 1980. The complaint, with its addendum, alleges that your committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431, et seq. ("The Act"). A copy of the complaint and addendum is enclosed. We have numbered this matter MUR 1328. Please refer to this number in all future correspondence.

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Letter to Mr. Claude D. Carter  
Page two

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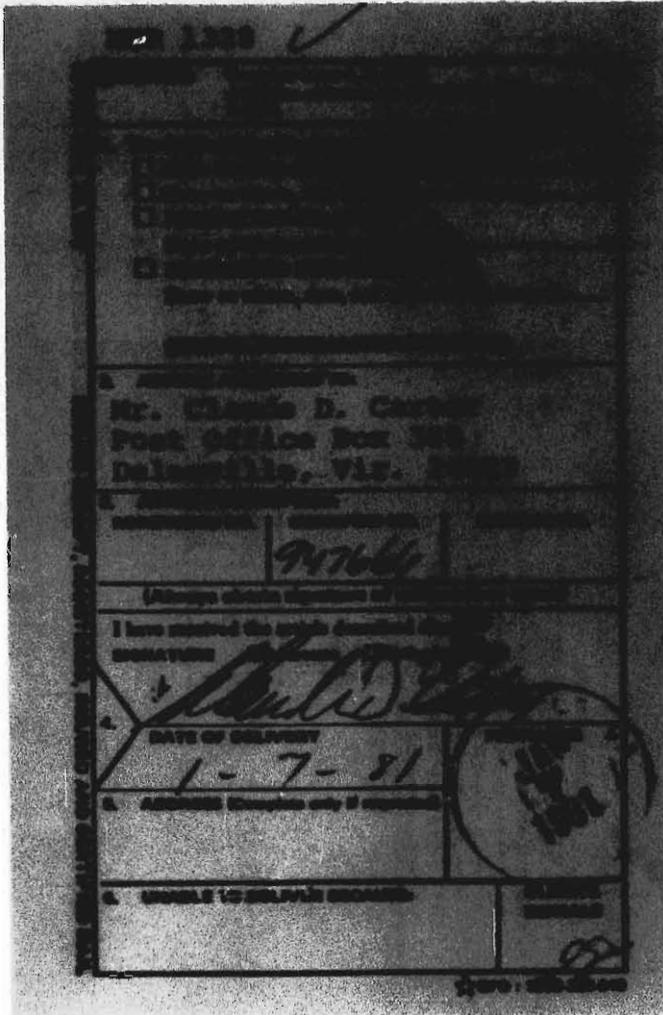
Sincerely,



Charles N. Steele  
General Counsel

Enclosure

1. Complaint
2. Addendum
3. Procedures



Mr. Claude D. Carter  
Post Office Box 300  
Delmarville, Va. 22024

DATE OF DELIVERY  
1-7-81

9766

82040330110



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

December 31, 1980

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Ms. Hilda Traina, Chairman  
The Democratic City Committee of  
Hopewell, Virginia  
3408 Vinton Street,  
Hopewell, Virginia 23860

MUR # 1328

Dear Ms. Traina:

This letter is to notify you that on December 15, 1980, the Federal Election Commission received an addendum to a complaint filed with the Commission on October 31, 1980. The complaint, with its addendum, alleges that your committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431, et seq. ("The Act"). A copy of the complaint and addendum is enclosed. We have numbered this matter MUR 1328. Please refer to this number in all future correspondence.

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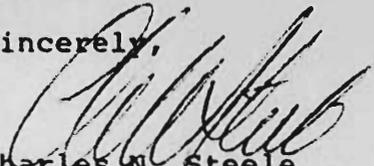
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Letter to Ms. Hilda Traina  
Page two

If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel to receive any notifications and other communications with the Commission.

If you have any questions, please contact William Taylor, the attorney assigned to this matter, at (202) 523-4529. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,



Charles N. Steele  
General Counsel

Enclosure

1. Complaint
2. Addendum
3. Procedures

82040330412



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

December 31, 1980

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Dr. Van B. McCarter  
The Democratic City Committee of  
Galax, Virginia  
212 West Center Street,  
Galax, Virginia 24333

MUR # 1328

Dear Dr. McCarter:

This letter is to notify you that on December 15, 1980, the Federal Election Commission received an addendum to a complaint filed with the Commission on October 31, 1980. The complaint, with it addendum, alleges that your committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431, et seq. ("The Act"). A copy of the complaint and addendum is enclosed. We have numbered this matter MUR 1328. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate, in writing, that no action should be taken against your committee in connection with this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

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.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

32040330413

Letter to Dr. Van B. McCarter  
Page two

If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel to receive any notifications and other communications with the Commission.

If you have any questions, please contact William Taylor, the attorney assigned to this matter, at (202) 523-4529. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,



Charles N. Steele  
General Counsel

Enclosure

1. Complaint
2. Addendum
3. Procedures

3 2 0 4 0 3 3 0 4 1 4



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

December 31, 1980

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Claude A. Stokes, Jr., Chairman  
The Democratic County Committee of  
Warren County, Virginia  
1016 Virginia Avenue,  
Front Royal, Virginia 22630

MUR # 1328

Dear Mr. Stokes:

This letter is to notify you that on December 15, 1980, the Federal Election Commission received an addendum to a complaint filed with the Commission on October 31, 1980. The complaint, with its addendum, alleges that your committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431, *et seq.* ("The Act"). A copy of the complaint and addendum is enclosed. We have numbered this matter MUR 1328. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate, in writing, that no action should be taken against your committee in connection with this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

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.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

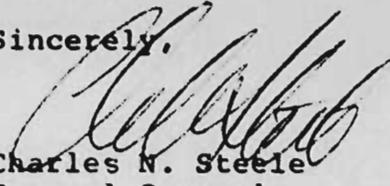
32040330415

Letter to Mr. Claude A. Stokes, Jr.  
Page two

If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel to receive any notifications and other communications with the Commission.

If you have any questions, please contact William Taylor, the attorney assigned to this matter, at (202) 523-4529. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,



Charles N. Steele  
General Counsel

Enclosure

1. Complaint
2. Addendum
3. Procedures

82040330416



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

December 31, 1980

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Kenneth Broom,  
The Democratic County Committee of  
Grayson County, Virginia  
Route 1, Box 45  
Fries, Virginia 24330

MUR # 1328

Dear Mr. Broom:

This letter is to notify you that on December 15, 1980, the Federal Election Commission received an addendum to a complaint filed with the Commission on October 31, 1980. The complaint, with its addendum, alleges that your committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431, et seq. ("The Act"). A copy of the complaint and addendum is enclosed. We have numbered this matter MUR 1328. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate, in writing, that no action should be taken against your committee in connection with this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

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.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

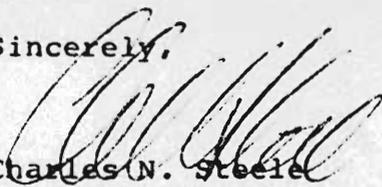
82040330417

Letter to Mr. Kenneth Broom,  
Page two

If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel to receive any notifications and other communications with the Commission.

If you have any questions, please contact William Taylor, the attorney assigned to this matter, at (202) 523-4529. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

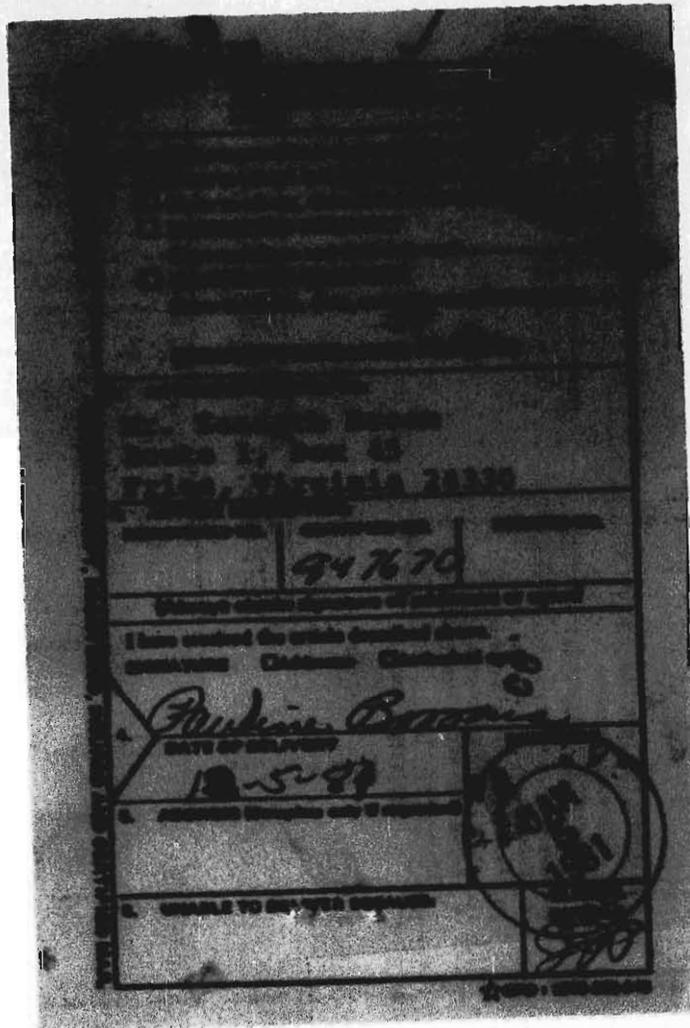
Sincerely,

  
Charles N. Steele  
General Counsel

Enclosure

1. Complaint
2. Addendum
3. Procedures

82040330419



The stamp contains the following information:

- Mr. Kenneth Broom
- 1000 17th St NW
- Washington, D.C. 20036
- 947670
- DATE OF DELIVERY: 10-5-83
- MAIL SERVICE



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

December 31, 1980

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Lawrence H. Framme, III, Esq.  
1400 Ross Building,  
Richmond, Virginia 23219

MUR # 1328

Dear Mr. Framme:

This letter is to notify you that on December 15, 1980, the Federal Election Commission received an addendum to a complaint filed with the Commission on October 31, 1980. The complaint, with its addendum, alleges that your committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431, *et seq.* ("The Act"). A copy of the complaint and addendum is enclosed. We have numbered this matter MUR 1328. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate, in writing, that no action should be taken against your committee in connection with this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

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.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

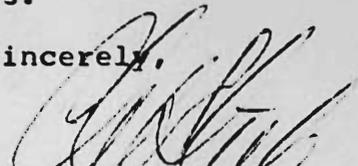
82040330120

Letter to Lawrence H. Framme, III, Esq.  
Page two

If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel to receive any notifications and other communications with the Commission.

If you have any questions, please contact William Taylor, the attorney assigned to this matter, at (202) 523-4529. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,



Charles N. Steele  
General Counsel

Enclosure

1. Complaint
2. Addendum
3. Procedures

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3633  
80 DEC 24 12:22  
911675

**SEDAM & HERGE**  
A PROFESSIONAL CORPORATION  
ATTORNEYS AT LAW  
7600 OLD SPRINGHOUSE ROAD  
MCLEAN, VIRGINIA 22108

GLENN J. SEDAM, JR.  
J. CURTIS HERGE

(703) 821-1000

1700 PENNSYLVANIA AVENUE, N.W.  
WASHINGTON, D.C. 20006  
(202) 393-7124

ROBERT R. SPARKS, JR.  
MICHAEL D. HUGHES  
A. MARK CHRISTOPHER  
KAREN LUSSEN BLAIR  
JOHN ROBERT CLARK III  
J. STANLEY PAYNE, JR.

December 22, 1980

TWX/TELEX 710-831-0888  
CABLE: SEDAMHERGE

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

Dear Members of the Commission:

This letter constitutes a complaint filed on behalf of our client, Republican Party of Virginia, 115 East Grace Street, Richmond, Virginia 23219, a political committee as defined under 2 U.S.C. §431(c), against the Democratic County Committee of Lee County, Virginia, Mr. Paul D. Harris, Chairman, Post Office Box 404, Jonesville, Virginia 24263.

Attached hereto as Exhibit A is a certified true transcription of a tape recording of a commercial advocating the election of Jimmy Carter which, upon information and belief, was aired by WSWV AM/FM Radio Station, 311 Woodway Road, Pennington Gap, Virginia 24277. Attached also as Exhibit B is, upon information and belief, a copy of the contract between WSWV Radio Station and the Democratic Committee of Lee County, Virginia, for the broadcasting of the commercial nine times between November 1, 1980 and November 4, 1980.

that: 2 U.S.C. §441(a)(d)(1) states in applicable part,

"a national committee of a political party and a state committee of a political party, including any subordinate committee of a state committee may make expenditures in connection with the general election campaign of candidates for federal office..."

80 DEC 29 11:04

82040330122

General Counsel  
Federal Election Commission  
Page Two  
December 22, 1980

National party committees are limited by 2 U.S.C. §441(a)(d)(2), 11 CFR 110.7(a)(1) and (2), to "expenditures which do not exceed an amount equal to 2 cents multiplied by the voting age population of the United States..."

11 CFR 110.7(a)(4) states that:

"The National Committee of a political party may make expenditures authorized by this section through any agent, including state and subordinate party committees."

In AO 1980-87, the Federal Election Commission determined that the provisions of the Federal Election Campaign Act, and the Regulations promulgated by the Commission which are cited above, restrict the activities of local party committees, so that expenditures for radio advertisements in support of presidential and vice presidential candidates can only be made if authorized and reported by the national committee.

The advertisement disclaimer implies that the advertisement was not paid for by the Democratic County Committee of Lee County, Virginia, as an agent of the Democratic National Committee. If the Democratic National Committee neither authorized nor reported the expenditure for the radio advertisement, the expenditures were made in violation of the Federal Election Campaign Laws.

11 CFR §110.11 (a)(1) states that all disclaimers:

[S]hall appear or be presented in a clear and conspicuous manner to give the reader, observer or listener adequate notice of the identity of persons who paid for or who authorized the communication...

Even if the Democratic County Committee of Lee County, Virginia, acted as an agent for the Democratic National Committee when it contracted with WSWV Radio Station

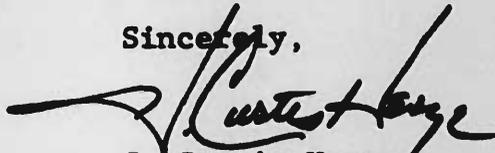
82040330423

General Counsel  
Federal Election Commission  
Page Three  
December 22, 1980

for the broadcasting of the advertisement, the disclaimer  
broadcasted with the advertisement violated 11 CFR §110.11(a)(1).

Your prompt attention to this complaint would be  
appreciated.

Sincerely,



J. Curtis Herge  
Counsel for the Republican  
Party of Virginia

Enclosures

Subscribed and sworn to before me this 22<sup>nd</sup> day of  
December, 1980.

Cynthia D. McDarty  
Notary Public

My commission expires: December 5, 1982

32040330424

The following, a paid political program.

Voters of Lee County, we appealed to you earlier this year in an effort to get you to vote to defeat the bond referendum proposed by the Republican Party. We stated the facts concerning what would happen if the referendum passed. The voters ignored our pleas, and passed the referendum. Now you, your children, and the County are the losers. The County is further in debt, the services have been cut, all of you have had an enormous tax increase. This has imposed a terrible burden on you, the taxpayers; and, has served one purpose, and one purpose only: to employ and raise the salaries of incompetent Republican employees. In last year's County election, the voters were so impressed by Republican false propaganda that they refused to listen to the truth from any Democrat concerning the affairs of Lee County. Now that the smoke has cleared, and you have been shocked into reality, we would like to relate to you the actual facts of what has happened in Lee County in recent years.

In the County election of 1971, the Republican party gained control of the County Board of Supervisors. During their 4-year term, they had their plans drawn for the construction of a new courthouse and appropriated the first money toward that project. Plans were continuing when they

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were defeated for reelection in 1975. After their defeat, they held numerous meetings to spend all the County money, so the Democrats would go into office with no money to operate on. As if that wasn't enough, they were successful in getting the \$1,000,000.00 in Federal funds, which Lee County was supposed to get for the courthouse, diverted to another county. After they had succeeded in bankrupting the County, they started an intense propaganda campaign, blaming the Democrats for building the courthouse, and putting the County into bankruptcy. They spread these falsehoods County-wide, every day for 4 years. Unfortunately, the people believed their falsehoods and swept them into office last year. They then led the voters into passing the bond referendum, by telling them if they didn't pass it, their taxes would be raised, schools would be closed, and numerous other falsehoods. This is only the first year of their term. Wait until you have endured 3 more years of it.

We now have another election at hand, Tuesday, November 4th. Jimmy Carter is a capable, honest, hardworking Christian man. He has worked hard to restore the respect and integrity of this nation after it was destroyed during the Nixon-Agnew Administration. He admits his mistakes, which are far outweighed by his accomplishments. He is not responsible for inflation, which is a world-wide problem. He will keep this country at peace.

Your other choice for President, Ronald Reagan, has the same qualifications for that position as your Lee County Board of Supervisors has for governing the County.

Don't vote to put the Federal Government in the hands of an incompetent person, who might plunge us into war at any time. Don't make another mistake! Be sure to vote November 4th. Vote for yourself, your children, your County, and your nation. Vote to reelect Jimmy Carter, President.

The preceding paid for and authorized by the Lee County Democratic Committee, Brenda Brooks, Treasurer.

*I certify that this is a true transcription:*

*December 22, 1980*

*Cynthia D. McFarty,  
Notary Public*

*My Commission Expires: December 5, 1982*

32040330127

# AGREEMENT FORM FOR POLITICAL BROADCASTS

STATION and LOCATION WLSR-TV, Lexington, Ky. Va. 11/1/80 1980

I, Jack Smith & Bobby Bare (being) James Carter (on behalf of) The Lee County Democratic Party

a legally qualified candidate of the Democrat political party for the office of President of the U.S.

in the (Presidential) General election to be held on 11/4/80, do hereby request station time as follows:

LENGTH OF BROADCAST	HOUR	DATE	TIMES PER WEEK	TOTAL NO. WEEKS	RATE
5-min.		3	9	1	\$6.50
30 Min (Bobby Bare)		1	1	1	\$20.00

DATE OF FIRST BROADCAST <u>11/1/80</u>	DATE OF LAST BROADCAST <u>11/4/80</u>
---	--

Total Charges: ~~\$18.50~~ \$20.00 \$58.50

The broadcast time will be used by The Lee Co. Democratic Party. I represent that the advance payment for the above-described broadcast time has been furnished by Lee County Democratic Party, Brenda Banks, Treasurer.

and you are authorized to so describe that sponsor in your log and to announce the program as paid for by such person or entity. The entity furnishing the payment, if other than an individual person, is: ( ) a corporation; () a committee; ( ) an association; or ( ) other unincorporated group. The names and offices of the chief executive officers of the entity are:

It is my understanding that: If the time is to be used by the candidate himself within 45 days of a primary or primary runoff election, or within 60 days of a general or special election, the above charges represent the lowest unit charge of the station for the same class and amount of time for the same period; where the use is by a person or entity other than the candidate or is by the candidate but outside the aforementioned 45 or 60 day periods, the above charges do not exceed the charges made for comparable use of such station by other users.

It is agreed that use of the station for the above-stated purposes will be governed by the Communications Act of 1934, as amended, and the FCC's rules and regulations, particularly those provisions reprinted on the back hereof, which I have read and understand. I further agree to indemnify and hold harmless the station for any damages or liability that may ensue from the performance of the above-stated broadcasts. For the above-stated broadcasts I also agree to prepare a script or transcription, which will be delivered to the station at least \_\_\_\_\_ before the time of the scheduled broadcasts; (note: the two preceding sentences are not applicable if the candidate is personally using the time).

Date: 10/30/80 Jack Smith  
(Candidate, Supporter or Agent)

Accepted } by Barbara Ashburn Title Office Mgr.  
Rejected } Wayne Symone

This application, whether accepted or rejected, will be available for public inspection for a period of two years in accordance with FCC regulations (AM, Section 73.120; FM, Section 73.290; TV, Section 73.657).

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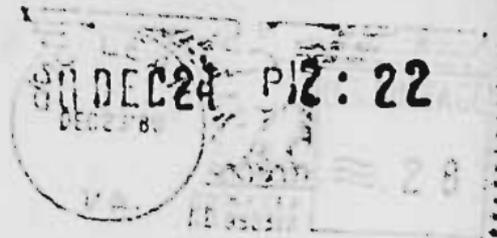
**SEDAM & HERGE**

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

7600 OLD SPRINGHOUSE ROAD

MCLEAN, VIRGINIA 22102



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

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**SEDAM & HERGE**  
A PROFESSIONAL CORPORATION  
ATTORNEYS AT LAW  
7800 OLD SPRINGHOUSE ROAD  
McLEAN, VIRGINIA 22108

(703) 821-1000

1700 PENNSYLVANIA AVENUE, N.W.  
WASHINGTON, D.C. 20006  
(202) 393-7124  
TWX/TELEX: 710-631-0886  
CABLE: SEDAMERGE

GLENN J. SEDAM, JR.  
J. CURTIS HERGE

ROBERT R. SPARKS, JR.  
MICHAEL D. HUGHES  
A. MARK CHRISTOPHER  
KAREN LUSSEN BLAIR  
JOHN ROBERT CLARK III  
J. STANLEY PAYNE, JR.

December 10, 1980

DEC 15 12:28

GENERAL COUNSEL

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

Dear Members of the Commission:

This letter constitutes an addendum to a complaint filed with the Commission on October 30, 1980, on behalf of our client, The Republican Party of Virginia, 115 East Grace Street, Richmond, Virginia 23219 against the Democratic County Committee of Rappahannock County, Virginia, the Democratic County Committee of Amelia County Virginia, and the Democratic County Committee of Clarke County Virginia.

The complaint of October 31, 1980 is hereby amended to include the following Committees:

1. The Democratic County Committee of Roanoke County, Virginia, Ms. Betty Ann Saunders, Chairman, 5134 Remington Road, S.W., Roanoke, Virginia 24014.
2. The Democratic County Committee of Greene County, Virginia, Ms. Constance Dudley, Chairman, Route 1, Box 221K, Stanardsville, Virginia 22973.
3. The Democratic County Committee of Orange County, Virginia, Mr. Watkins Ellerson, III, Chairman, Post Office Box 1080, Orange, Virginia 22960.
4. The Democratic County Committee of Gloucester County, Virginia, Mr. C. F. Hicks, Chairman, Gloucester, Virginia 23061.

82040330430

General Counsel  
Federal Election Commission  
Page Two  
December 10, 1980

5. The Democratic County Committee of Mathews County, Virginia, F. Paul Blanock, Chairman, Mathews, Virginia 23109.
6. The Democratic County Committee of Goochland County, Virginia, Mrs. Nancy Bowles, Chairman, Kents Store, Virginia 23084.
7. The Democratic County Committee of Lunenburg County, Virginia, Mr. James Edmunds, Chairman, Kenbridge, Virginia 23944.
8. The Democratic City Committee of Hopewell, Virginia, Ms. Hilda Traina, Chairman, 3408 Vinton Street, Hopewell, Virginia 23860.
9. The Democratic County Committee of Botetourt County, Virginia, Mr. Claude D. Carter, Chairman, Post Office Box 368, Daleville, Virginia 24083.
10. The Democratic County Committee of Henry County, Virginia, F. E. Marsh, Chairman, Main Street, Basset, Virginia 24055.
11. The Democratic City Committee of Martinsville, Virginia, Ms. Virginia Hall, Chairman, 1605 Mulberry Road, Martinsville, Virginia 24112.
12. The Democratic County Committee of Warren County, Virginia, Mr. Claude A. Stokes, Jr., Chairman, 1016 Virginia Avenue, Front Royal, Virginia 22630.
13. The Democratic City Committee of Galax, Virginia, Dr. Van B. McCarter, 212 West Center Street, Galax, Virginia 24333.
14. The Democratic County Committee of Grayson County, Virginia, Mr. Kenneth Broom, Route 1, Box 45, Fries, Virginia 24330.

3 2 0 4 0 3 3 0 4 3 1

General Counsel  
Federal Election Commission  
Page Three  
December 10, 1980

Attached hereto as Exhibits A through N are copies of advertisements, advocating the election of Jimmy Carter, which appeared in the following newspapers. Each advertisement contains a disclaimer which states that one of the committees listed above paid for the advertisement:

- A. The Roanoke Times and World News of November 1, 1980;
- B. The Ameila Bulletin Monitor of October 30, 1980;
- C. The Green County Record of October 30, 1980;
- D. The Clarke County Courier of October 23, 1980;
- E. The Clarke County Courier of October 30, 1980;
- F. The Gloucester - Mathews Gazette Journal of October 30, 1980;
- G. The Goochland Gazette of October 30, 1980;
- H. The Kenbridge - Victoria Dispatch of October 30, 1980;
- I. The Fincastle Herald of October 30, 1980;
- J. The Progress Index of October 30, 1980;
- K. The Martinsville Bulletin of November 2, 1980;
- L. The Martinsville Bulletin of November 3, 1980;
- M. The Front Royal-Warren Sentinel of October 30, 1980;
- N. The Galax Gazette of October 31, 1980.

2 U.S.C. §441(a)(d)(1) states in applicable part,  
that:

82040330432

General Counsel  
Federal Election Commission  
Page Four  
December 10, 1980

"a national committee of a political party and a state committee of a political party, including any subordinate committee of a state committee may make expenditures in connection with the general election campaign of candidates for federal office..."

National party committees are limited by 2 U.S.C. §441 (a)(d)(2), 11 CFR 110.7(a)(1) and (2), to "expenditures which do not exceed an amount equal to 2 cents multiplied by the voting age population of the United States..."

11 CFR 110.7(a)(4) states that:

"The National Committee of a political party may make expenditures authorized by this section through any agent, including state and subordinate party committees."

In AO 1980-87, the Federal Election Commission determined that the provisions of the Federal Election Campaign Act, and the Regulations promulgated by the Commission which are cited above, restrict the activities of local party committees, so that expenditures for newspaper advertisements in support of presidential and vice presidential candidates can only be made if authorized and reported by the national committee.

The disclaimers which appear on the advertisements imply that the advertisements were not paid for by the various Democratic City and County Committees as agents of the Democratic National Committees. If the Democratic National Committee neither authorized nor reported the expenditures for the newspaper advertisements, the expenditures were made in violation of the Federal Election Campaign Laws.

11 CFR §110.11(a)(1) states that any disclaimer:

"...shall be presented in a clear and conspicuous manner to give the reader, observer or listner

32040330433

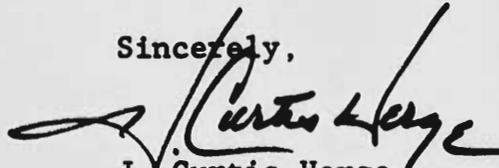
General Counsel  
Federal Election Commission  
Page Five  
December 10, 1980

adequate notice of the identity of persons who  
paid for or who authorized the communication..."

If the Democratic National Committee did authorize  
and report the expenditures for the attached advertisements,  
then the disclaimers which appeared on the advertisements  
did not comply with 11 CFR 110.11(a)(1) as said disclaimers  
do not give the reader adequate notice that the Democratic  
National Committee paid for and authorize the attached  
advertisements.

Your prompt attention to this addendum would be  
appreciated.

Sincerely,



J. Curtis Herge  
Counsel for the Republican  
Party of Virginia

Subscribed and sworn to me this 10<sup>th</sup> day of  
December, 1980.

  
\_\_\_\_\_  
Notary Public

My Commission Expires:

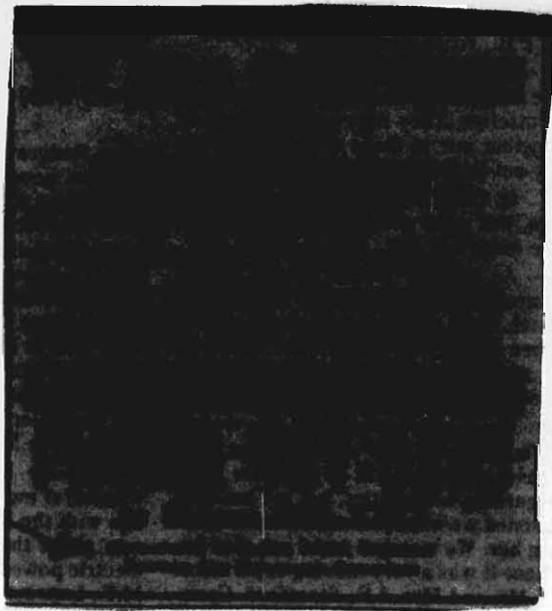
*May 15, 1984*

Attachments

32040330434



8 2 0 4 0 3 3 0 4 3 5



8 2 0 4 0 3 3 0 1 3 6

# THE AMELIA BULLETIN MONITOR

The Amelia Bulletin Monitor, Thursday, October 20, 1950

Comment:

U.S. POSTAGE  
PAID  
Post Office No. 8  
Amelia, C.H., Va. 23002

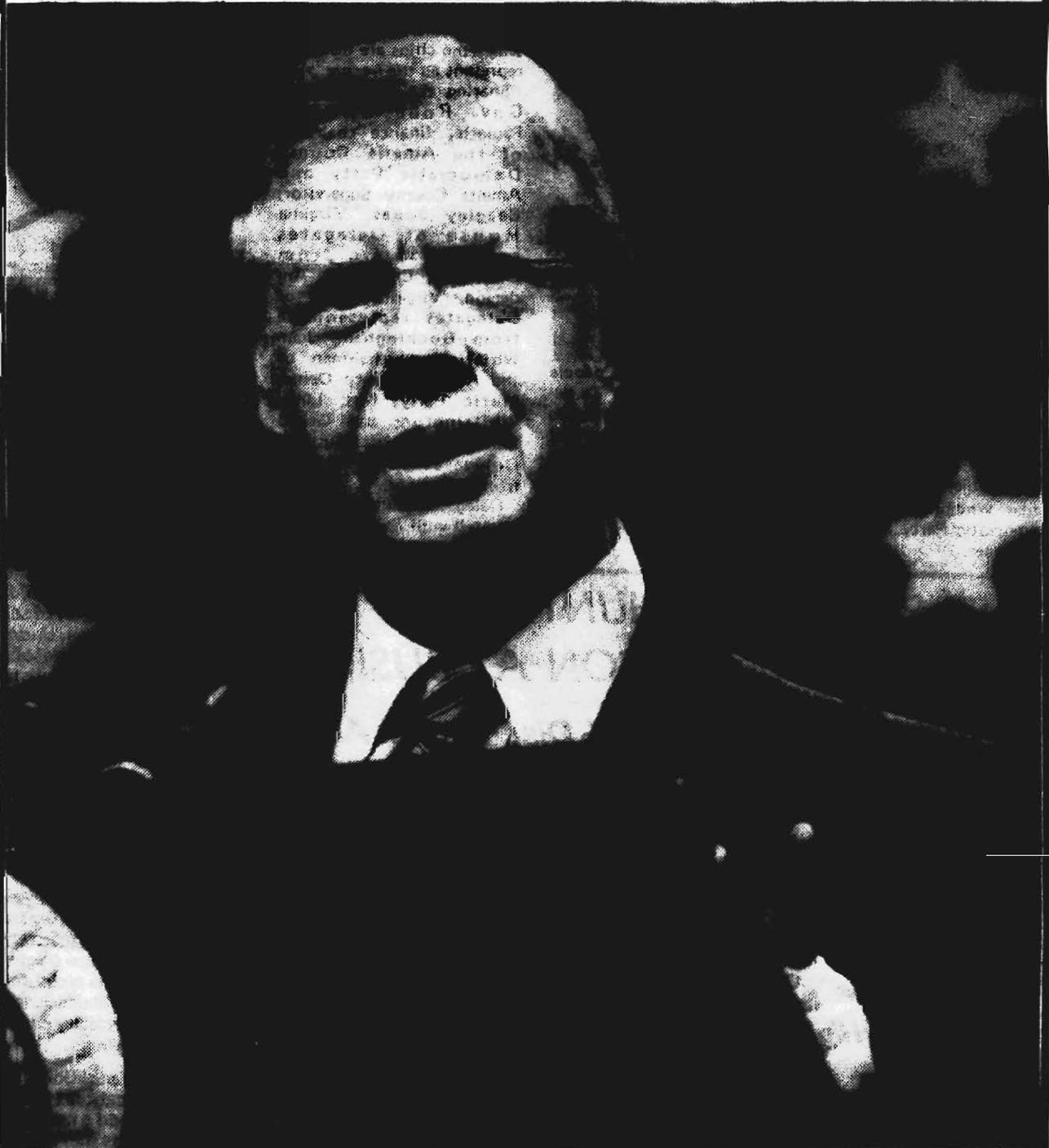
VOL. 35 NO. 1111



in a local election on Tuesday, October 17, 1950. The election was held at the Amelia High School building. The results of the election were as follows: ...

3 2 0 4 0 3 3 0 1 3 7

# For A Responsible America Tomorrow Re-Elect President Carter



**Election Day is  
Tuesday, November 4th**

Filed for by Amelia County Democratic Party  
Ricky F. Arlington, Treasurer

EXHIBIT B

204033048

# The Register

Published every Thursday morning

STANARDSVILLE, VIRGINIA 22978

## Carter / Mondale

OCT. 30, 31, & NOV. 1



# VOTE

## Democratic on Tuesday The Party of the People

Green, Carter, Democratic Committee, Scott, Treasurer

# CLARKE<sup>4TH</sup> <sup>3</sup>COURIER



VOL. CXI. NO. 36

AWARDS WINNING NEWSPAPER BERRYVILLE, VA. OCTOBER 23, 1980

ONE SECTION 30 CENTS F

## VOTE DEMOCRATIC

# Jimmy Carter

## Nov. 4th



By authority of Lawrence W. White, Jr., Chairman, Clarke Co. Campaign



7 AWARDS WINNING NEWSPAPER BERRYVILLE, VA. OCTOBER 30, 1980 ONE SECTION 30 CENTS PER COPY

# VOTE

# Jimmy Carter

# Walter Mondale

# DEMOCRATS

By authority of Lawrence W. White, Jr., Chairman, Clarke County Democratic Committee

(PAID ADVERTISEMENT)

**What is the unknown record of the Carter Administration?**

It can be summed up in one word: progress. The kind of progress that comes from hard, steady work. The kind of progress that doesn't always make headlines. The kind of progress that honors the Carter commitment to America and points us in the direction of the best future.

You may be surprised when you discover how much President Carter has accomplished—and in only 3-1/2 years! Take a look at just a few of his achievements:

- Created 8-1/2 million new jobs in the economy—a greater increase than in any comparable period in our history.
- Had four of every five bills sent to Congress passed—a record every bit as impressive as Lyndon Johnson's and John Kennedy's.
- Won enactment of America's first comprehensive energy plan—a plan that will make America less dependent on foreign oil and more secure in the future.
- Passed the Windfall Profits Tax—a tax which takes unearned profits from the big oil companies and gives the money to those who cannot afford to heat their homes.
- Hammered out the Middle East Peace Treaty between Israel and Egypt—a framework for peace in the future.
- Appointed more women to his Cabinet than any other President in history.
- Appointed more Blacks, Hispanics, and other minorities to judicial positions than all other presidents combined.
- Saved the Social Security system from certain bankruptcy.
- Reduced the Federal work force by over 20,000 employees—the first reduction in its size since the 1920s.
- Deregulated the airline and trucking industries, saving consumers millions of dollars.
- Increased federal support for education by 70%.

With a record like this, President Carter and Vice President Mondale have earned their second term. Re-elect President Carter on November 4th. Keep him working for your future.

**Re-Elect  
President Carter  
and  
Vice President Mondale**



**A Tested and  
Trustworthy Team.  
Vote Democratic Nov. 4**



President Carter's strong leadership at the European Summit led to the establishment of a worldwide energy conservation policy and to the enactment of strong measures to counter the Soviet invasion of Afghanistan.



Each year in office, President Carter has increased expenditures for national defense.



President Carter speaks honestly and openly to the people of the United States at frequent town meetings.



Authorized by the Carter-Mondale Re-Election Committee, Inc.  
Robert S. Strauss, Chairman

**Gloucester County Democratic Committee**  
C.F. Hicks, Chairman  
**Mathews County Democratic Committee**  
F. Paul Blanock, Chairman

(This advertisement paid for by the Gloucester County Democratic Committee, the Mathews County Democratic Committee and the Democratic National Committee)

# A TESTED AND TRUSTWORTHY TEAM

**PRESIDENT**  
**Jimmy**  
**Carter**



**VICE**  
**PRESIDENT**  
**Walter**  
**Mondale**

## Take a minute to read the Real Carter record!

- Created 2-1/2 million new jobs in the economy—a greater increase than in any comparable period in our history.
- Had four of every five bills sent to Congress passed—a record every bit as impressive as Lyndon Johnson's and John Kennedy's.
- Won enactment of America's first comprehensive energy plan—a plan that will make America less dependent on foreign oil and more secure in the future.
- Passed the Windfall Profits Tax—a tax which takes unearned profits from the big oil companies and gives the money to those who cannot afford to heat their homes.
- Hammered out the Middle East Peace Treaty between Israel and Egypt—a framework for peace in the future.

- Appointed more women to his Cabinet than any other President in history.
  - Appointed more Blacks, Hispanics, and other minorities to judicial positions than all other presidents combined.
  - Saved the Social Security system from certain bankruptcy.
  - Reduced the Federal work force by over 20,000 employees—the first reduction in its size since the 1920's.
  - Deregulated the airline and trucking industries, saving consumers millions of dollars.
  - Increased federal support for education by 70%.
- With a record like this, President Carter and Vice President Mondale have earned their second term. Re-elect President Carter on November 4th. Keep him working for *your* future.

**On Tuesday, Nov. 4th, Vote Carter-Mondale**  
**For Goochland-For Virginia**  
**FOR AMERICA!**

Paid for by the Democratic Committee of Goochland County  
Nancy T. Bowles, Chairman

0 2 0 4 0 3 3 0 1 4 2

8 0 4 0 3 3 0 4 4 3

The Kenbridge - Victoria Dispatch, Victoria, Va., Thursday, October 30, 1980 - 9

(Paid Political Advertisement)

# Small Town America Can Depend On Jimmy Carter



**A President  
From Rural America  
And  
For Rural America**

(Paid Political Advertisement)

# Jimmy Carter Who Understands And Represents

## HE ADVOCATES:

1. Price support and acreage reduction
2. High base price support
3. Protection of beef cattle
4. Development of export markets

In Virginia, NET farm income was \$1.2 billion in 1979.

Virginia's share of total US farm income in 1979. Farmers Home Administration loans have increased 235% since 1977. Federal farm program expenditures increased 102%.

# VOTE NOVEMBER





# Progress

Warburg, Colonial Heights, Hopewell, Va., And

November 3, 1980

(USPS 447-080)

(Paid Political Advertisement)

## **VOTE and RE-ELECT**

### **President Carter and Vice President Mondale.**

**A tested and trustworthy team.**



#### **A RECORD OF ACHIEVEMENT.**

- Concern for senior citizens, health and quality of life
- More than 8 1/2 million new jobs
- Increased the nation's commitment to strong national defense
- Defender of human rights and a leader as a peacemaker
- Reorganization and better management of federal government
- Appointed more Blacks, Hispanics and other minorities to government positions, boards and commissions
- Reduced gasoline consumption by 12%, achieved passage of the Windfall Profits Tax

**PHONE 458-6394 FOR TRANSPORTATION TO THE POLLS**

**Paid for and authorized by the Hopewell Democratic Committee,  
John Heretick, Treasurer.**

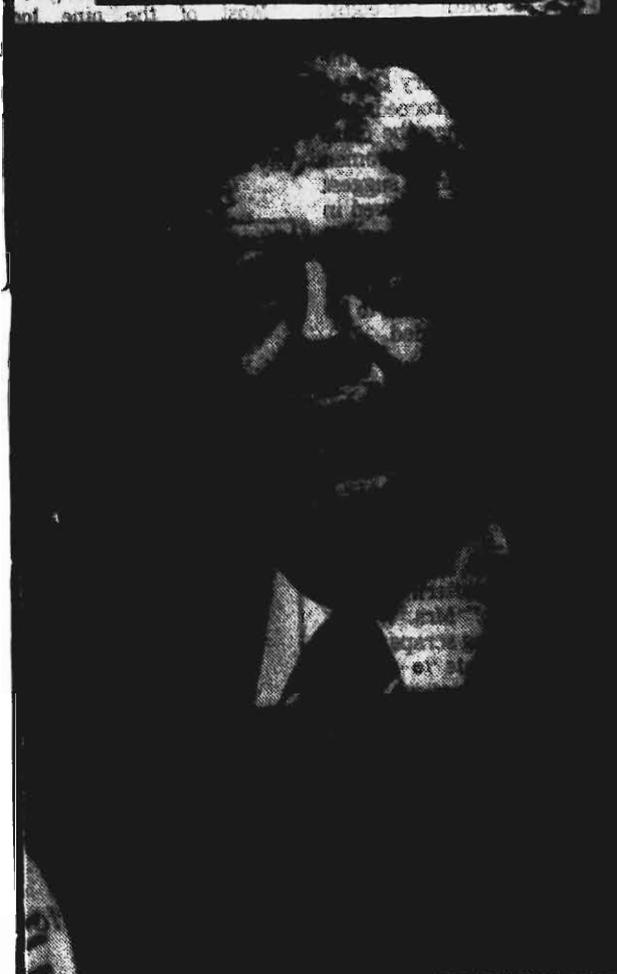
3 2 0 4 0 3 3 0 4 4 6

VIRGINIA  
MAY 2, 1988

# MART

# CARTER

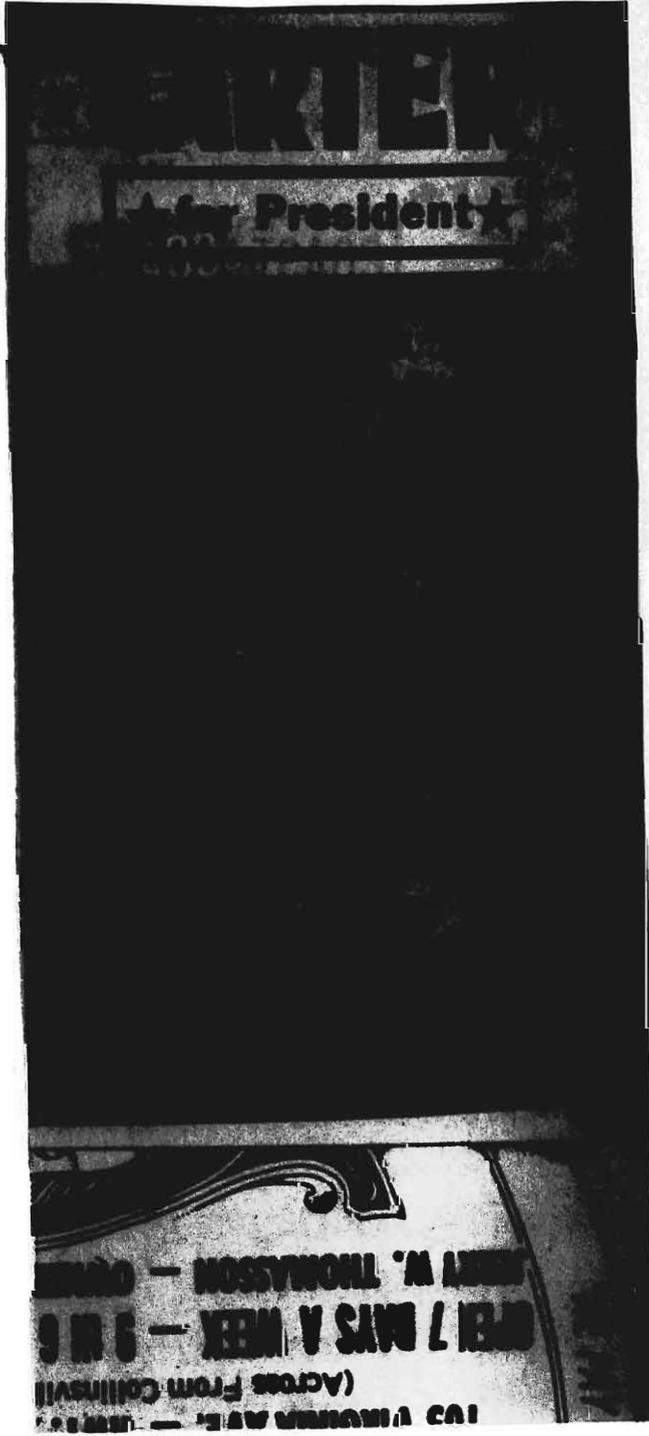
★ for President ★



... In 1976 Jimmy Carter  
Carried Martinsville & Henry County  
.. do Your Part Toward A  
Better Tomorrow ...

8 2 0 4 0 3 3 0 4 4 7

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# Sen

31th YEAR NO. 30 • THURSDAY

PAID POL. ADX

VOTE

TUESDAY NOVEMBER 4, 1980

**DEMOCRATIC PARTY**  
**JIMMY CARTER, PRESIDENT**  
**WALTER F. MONDALE, VICE PRESIDENT**

APPLICANTS FOR ABSENTEE BALLOTS MUST BE FILED  
NO LATER THAN 5 P.M. SATURDAY, NOVEMBER 1, 1980.

IF YOU NEED TRANSPORTATION TO THE POLLING PLACE ON  
ELECTION DAY CALL CARTER-MONDALE HEADQUARTERS

**636-1638**

BY AUTHORITY OF: FRANKS COVERSTONE, TREAS.  
BERNARD COUNTY DEMOCRATIC COMMITTEE



0330449

9 2 0 4 0 3 3 0 1 5 0



**For Continued  
Peace and Progress**

**VOTE**

**CARTER/MONDALE**

**Tuesday, Nov. 4th.**



**Re-Elect President Carter  
and Vice President Mondale.  
The Democrats.  
For a better tomorrow.**

Paid For By Authority of Ruthie Alderman Treasurer,  
Galax Democratic Committee & Rex Farmer Treasurer,  
Grayson Democratic Committee

8 2 0 4 0 3 3 0 4 5 1

RECEIVED

80 DEC 15 A10:02



# FIRST CLASS

**SEDAM & HERGE**  
 ATTORNEYS AT LAW  
 7600 OLD SPRINGHOUSE ROAD  
 MCLEAN, VIRGINIA 22012

**To:** General Counsel  
 Federal Election Commission  
 1325 K Street, N.W.  
 Washington, D.C. 20463

**FIRST CLASS MAIL**

3667

RECEIVED

Federal Election Commission  
December 8, 1980  
Page Two

80 DEC 2 4 08: 00

Since the advertisements were placed by the local Committees, the Committees placed on the disclaimer that the ads were by the authority of the local party chairman or treasurer, rather than the Democratic National Committee. However, under the circumstances, we do not believe that the Commission should take further action in the matter. For this reason we request the Commission to take no further action in this matter.

Because of the present time I am sending this letter directly to you although it is not yet subscribed and sworn to by the individual county chairmen. However, copies have been sent to the individual chairmen and the copies executed by them will be forwarded directly to you shortly.

Respectfully submitted,

Lawrence H. Framme, III  
Counsel for the Amelia  
County Democratic Committee,  
the Clarke County Democratic  
Committee, the Rappahannock  
Democratic Committee

We, the undersigned, believe that the foregoing is true to the best of our knowledge and belief.

*Juan A. Whittington*  
Juan Whittington, Chairman  
Amelia Democratic Committee

Given under my hand this 29 day of Dec, 1980.

198\_\_.

My commission expires:

9-10-83  
*Mavis B. Jones*  
Notary Public

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RECEIVED  
GENERAL COUNSEL

31 JAN 2 P 2: 35

80 DEC 2 4 22: 35

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Attention:  
William Taylor, Esq.

ANELIAG.H.W.  
DEC 29  
PM  
1983  
22002



FEDERAL ELECTION COMMISSION  
1325 K STREET, N.W.  
WASHINGTON, D. C. 20463

8 SPECIAL DELIVERY

80 DEC 2 A 9 :

RECEIVED

91166

RECEIVED

600-3598

80 DEC 18 P12:31

1400 ROSS BUILDING  
RICHMOND, VIRGINIA 23219

December 8, 1980

30 DEC 18 P 3: 23

GENERAL COUNSEL

Federal Election Commission  
Washington, D. C. 20463

Attention: William Taylor, Esquire

Re: MUR 1328 (80)

Dear Mr. Taylor:

This letter is written as a response to the Federal Election Commission's notification of November 3, 1980 to the Amelia County Democratic Committee, Clarke County Democratic Committee and Rappahannock County Democratic Committee. Based on the information set forth below, each of these Committees believe that no further action should be taken against them in connection with this matter.

During the month of October each of these three Committees placed newspaper advertising in newspapers in their localities urging support of the Carter/Mondale ticket. At the time that the advertisements were placed each of these Committees were authorized by the Democratic National Committee to expend for these advertisements on behalf of the Democratic National Committee. The Democratic National Committee has agreed that the amounts spent on these advertisements by the three local Committees are authorized and ratified by them and will be reported by the Democratic National Committee as expenditures permitted the DNC under 2 USC 441a (d). The Democratic National Committee is forwarding directly to the Federal Election Commission a statement confirming this authorization.

For your information the expenditures made were as follows: the Amelia County Democratic Committee, for advertising in the Amelia Bulletin Monitor the amount of \$229.86; the Clarke County Democratic Committee, for advertising in The Clarke Courier, the amount of \$180.00; the Rappahannock County Democratic Committee, for advertising in The Rappahannock News, the amount of \$94.60.

3 2 0 4 0 3 3 0 4 5 4

Federal Election Commission  
December 8, 1980  
Page Two

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Respectfully submitted,

Lawrence H. Framme, III  
Counsel for the Amelia  
County Democratic Committee,  
the Clarke County Democratic  
Committee, the Rappahannock  
Democratic Committee

We, the undersigned, believe that the foregoing is true to the best of our knowledge and belief.

Juan Whittington, Chairman  
Amelia Democratic Committee

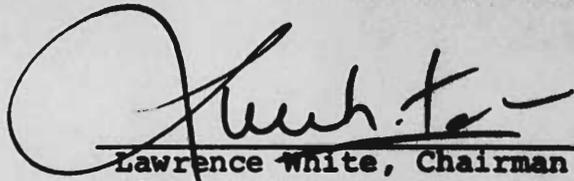
Given under my hand this \_\_\_\_\_ day of \_\_\_\_\_,

198\_\_.

My commission expires: \_\_\_\_\_.

\_\_\_\_\_  
Notary Public

3 2 0 4 0 3 3 0 1 5 5



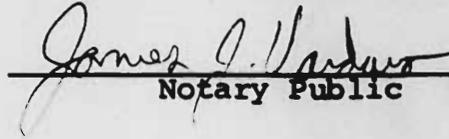
Lawrence White, Chairman  
Clarke County Democratic Committee

Given under my hand this 15<sup>th</sup> day of December,

1980.

My commission expires:

Nov 4, 1984



Notary Public

David Moore, Chairman  
Rappahannock Democratic Committee

Given under my hand this \_\_\_\_\_ day of \_\_\_\_\_,

198  .

My commission expires:

\_\_\_\_\_  
Notary Public

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82040330457



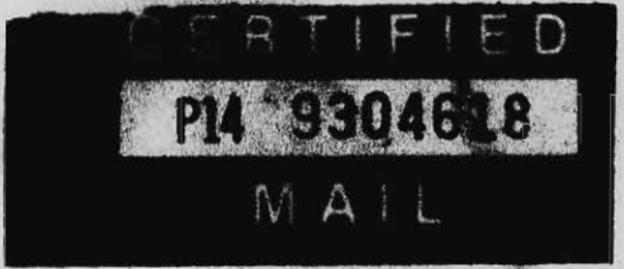
**Shenandoah Foods, Inc.**  
P.O. Box 2228  
Winchester, Virginia 22601



**Federal Election Commission**  
**Washington, D.C. 20463**

**RETURN RECEIPT  
REQUESTED**

**Attn: William Taylor Esquire**



RECEIVED GCEK

911553

353

80 DEC 12 PM 16

1400 ROSS BUILDING  
RICHMOND, VIRGINIA 23219

December 8, 1980

Federal Election Commission  
Washington, D. C. 20463

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DEC 12 1980

Federal Election Commission  
December 8, 1980  
Page Two

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Lawrence H. Framme, III  
Counsel for the Amelia  
County Democratic Committee,  
the Clarke County Democratic  
Committee, the Rappahannock  
Democratic Committee

We, the undersigned, believe that the foregoing is true to the best of our knowledge and belief.

Juan Whittington, Chairman  
Amelia Democratic Committee

Given under my hand this \_\_\_\_\_ day of \_\_\_\_\_,

198\_\_.

My commission expires: \_\_\_\_\_.

\_\_\_\_\_  
Notary Public

3 2 0 4 0 3 3 0 4 5 9

Lawrence White, Chairman  
Clarke County Democratic Committee

Given under my hand this \_\_\_\_\_ day of \_\_\_\_\_,  
198  .

My commission expires: \_\_\_\_\_

Notary Public

David M Moore  
David Moore, Chairman  
Rappahannock Democratic Committee

Given under my hand this 10 day of December,  
1980.

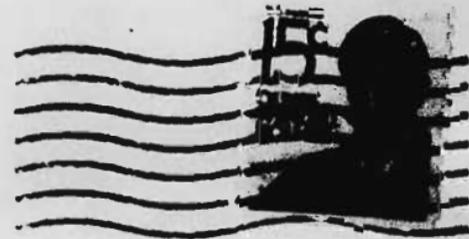
My commission expires: December 26, 1981

Sheila J. Estis  
Notary Public

32040330460

02040330461

RAFFAHANNOCK COUNTY  
DEMOCRATIC COMMITTEE  
WASHINGTON, VIRGINIA  
22747



Mr. William Taylor, Esq.

Re: MUR 1328 (80)

Federal Election Commission

Washington, Va.

20463

DC

30 DEC 12 P12:15

RECEIVED

91555 RECEIVED 301# 3543

1400 ROSS BUILDING  
RICHMOND, VIRGINIA 23219

80 DEC 11 P12:19

December 8, 1980

Federal Election Commission  
Washington, D. C. 20463

Attention: William Taylor, Esquire

Re: MUR 1328 (80)

Dear Mr. Taylor:

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80 DEC 11 P 2:33

RECEIVED  
GENERAL COUNSEL  
FEB 10 1981

20463

Federal Election Commission  
December 8, 1980  
Page Two

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Respectfully submitted,

*Lawrence H. Framme, III*

Lawrence H. Framme, III  
Counsel for the Amelia  
County Democratic Committee,  
the Clarke County Democratic  
Committee, the Rappahannock  
Democratic Committee

We, the undersigned, believe that the foregoing is true to the best of our knowledge and belief.

Juan Whittington, Chairman  
Amelia Democratic Committee

Given under my hand this \_\_\_\_\_ day of \_\_\_\_\_,

198\_\_.

My commission expires: \_\_\_\_\_.

\_\_\_\_\_  
Notary Public

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\_\_\_\_\_  
Lawrence White, Chairman  
Clarke County Democratic Committee

Given under my hand this \_\_\_\_\_ day of \_\_\_\_\_,  
198\_\_.

My commission expires: \_\_\_\_\_

\_\_\_\_\_  
Notary Public

\_\_\_\_\_  
David Moore, Chairman  
Rappahannock Democratic Committee

Given under my hand this \_\_\_\_\_ day of \_\_\_\_\_,  
198\_\_.

My commission expires: \_\_\_\_\_

\_\_\_\_\_  
Notary Public

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RECEIVED



08 DEC 19 12:19

Federal Election Commission  
1325 K Street, N.W.  
Washington, D. C. 20463

*A. H. Keyser Co Chairman*  
RAPPAHANNOCK COUNTY DEMOCRATIC COMMITTEE  
WASHINGTON, VIRGINIA 22247

RECEIVED

DEC 5 11:44

Dec 2, 1980

911460

3007  
3490

Mr. William Taylor Esq  
Federal Election Comm  
Washington D.C.

Dear Sir

Mr. Lawrence Tiram III is  
authorized to respond on behalf of the  
Rappahannock Dem Comm in the  
matter re Mur 1378 (80)

Yours Sincerely

A. H. Keyser

*cc Chairman*

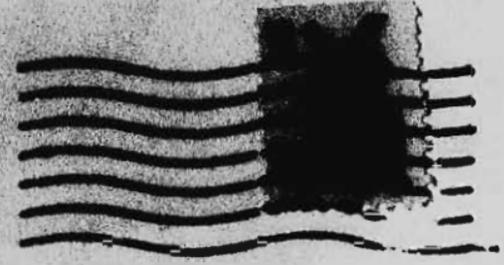
DEC 5 10:28

DEC 5 10:28

32040330466

*Dr. H. Keyser Co. Chairman*

**RAPPANNOCK COUNTY  
DEMOCRATIC COMMITTEE  
WASHINGTON, VIRGINIA  
22747**



82040330467

*Mr. William Taylor Esq  
Federal Election Commission  
Washington, D.C.  
20463*

80DEC5 P1:44

RECEIVED

CRC #  
3485

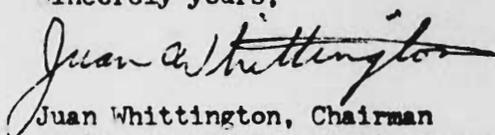
Route 4 - Box 136  
Amelia, Virginia 23002  
December 1, 1980

William Taylor, Esq.  
Federal Election Commission  
Washington, D. C. 20463

Dear Mr. Taylor:

Lawrence H. Framme, III is authorized to respond on behalf  
of the Amelia County Democratic Committee in the matter of  
MUR 1328 (80).

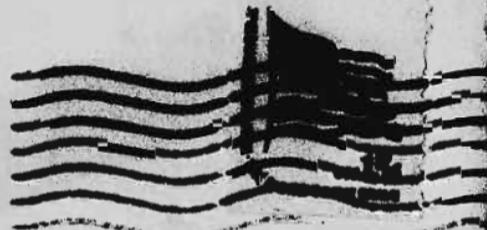
Sincerely yours,



Juan Whittington, Chairman  
Amelia County Democratic Committee

8 2 0 4 0 3 3 0 1 6 8

Juan W. Whittington  
Route 4 - Box 136  
Amelia, Virginia 23002



Mr. William Taylor, Esq.  
Federal Election Commission  
Washington, D. C. 20463

80DEC 4 411:43

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82040330469

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88888 8:1:00  
911461

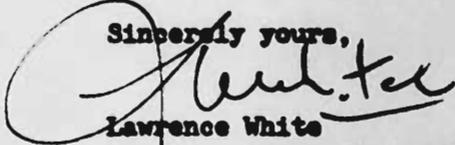
December 3, 1980

William Taylor  
Federal Election Commission,  
Washington, D. C. 20463

Dear Sir:

Lawrence H. Franke, III, is authorized to respond on behalf of the  
Clarke County Democratic Committee in the matter of MUR 1328 (80).

Thanking you, I remain,

Sincerely yours,  
  
Lawrence White  
Chairman Democratic Committee

LW/ed

02040330470

10 DEC 5 P 2: 37

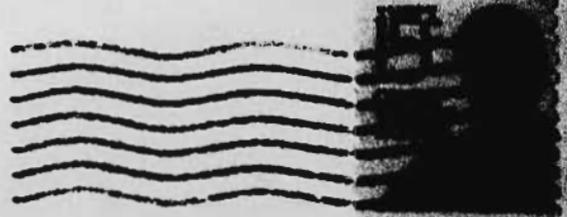
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GENERAL INVESTIGATIVE  
DIVISION

82040330171



**Shenandoah Foods, Inc.**

P.O. Box 2196  
Winchester, Virginia 22601



**Mr. William Taylor, Esq.  
Federal Election Commission  
Washington, D. C. 20463**

80DEC5 P1:43

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RAPPAHANNOCK COUNTY DEMOCRATIC COMMITTEE  
WASHINGTON, VIRGINIA 22347

911440  
GCC#  
3468

Mr. William Taylor, Reg.  
Federal Election Commission  
Washington, D.C. 20463

30 DEC 3 11:31

RECEIVED  
GENERAL COUNSEL

Dear Sir:

As Co-chairmen of the Rappahannock  
Co. Democratic Party I authorize  
Lawrence H. Franke, III to respond  
on behalf of the Rappahannock Co.  
Democratic Comm. in the matter of  
MUR 1328 (80).

Thank you.

Sincerely,  
David M. Moore  
Rappahannock Co  
Demo. Party  
Co-Chairman

32040330472

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RAPPAHANNOCK COUNTY  
DEMOCRATIC COMMITTEE  
WASHINGTON, VIRGINIA  
22747

Mr. William Taylor, Esq.  
Federal Election Commission  
Washington, D.C. 20463



RECEIVED  
CCC#  
3397

911252  
1400 ROSS BUILDING  
RICHMOND, VIRGINIA 23219

80 NOV 24 AID: 84

November 20, 1980

Charles N. Steele, Esquire  
Federal Election Commission  
Washington, D.C. 20463

MUR 1328 (80)  
Clarke County Democratic Committee  
Rappahannock County Democratic Committee  
Amelia County Democratic Committee

Dear Mr. Steele:

I have been asked to respond on behalf of the above-named Committees to the Complaint filed against them. We are investigating the matter at this time and should have sufficient information to make a fuller response within the next ten days. I would appreciate the Commission deferring any action for that period of time. If you have any questions, please give me a call at (804) 644-4131.

Very truly yours,

  
Lawrence H. Framme, III

LHF, III/cfr

cc: Lawrence White, Chairman  
Clarke County Democratic Committee

David Moore and A. H. Keyser, Co-Chairmen  
Rappahannock County Democratic Committee

Juan Whittington, Chairman  
Amelia County Democratic Committee

NOV 24 11:02 AM '80

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NOV 24 1980  
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Charles N. Steele, Esquire  
Federal Election Commission  
Washington, D. C. 20463



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

April 9, 1981

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Prentis Webb, Treasurer  
Roanoke City Democratic Committee  
P.O. Box 20  
Roanoke, Virginia 24002

Re: MUR 1328

Dear Mr. Webb:

This letter is to notify you that on December 10, 1980, the Federal Election Commission received a complaint which alleged that your committee has violated certain sections 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 1328. Please refer to this number in all future correspondence.

You were not previously notified as you were not clearly identified as a respondent in the complaint. Under the Act, you have the opportunity to demonstrate, in writing, that no action should be taken against your committee in connection with this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

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.

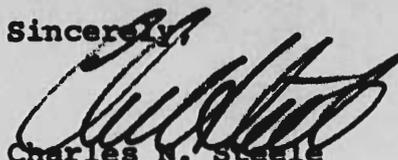
This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

8 2 0 4 0 3 3 0 4 7 6

If you have any questions, please contact William Taylor, the attorney assigned to this matter at (202) 523-4529. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,



Charles N. Steele  
General Counsel

Enclosures

1. Complaint
2. Procedures

82040330177



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Prentis Webb, Treasurer  
Roanoke City Democratic Committee  
P.O. Box 20  
Roanoke, Virginia 24002

Re: MUR 1328

Dear Mr. Webb:

This letter is to notify you that on December 10, 1980, the Federal Election Commission received a complaint which alleged that your committee has violated certain sections 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 1328. Please refer to this number in all future correspondence.

You were not previously notified as you were not clearly identified as a respondent in the complaint. Under the Act, you have the opportunity to demonstrate, in writing, that no action should be taken against your committee in connection with this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

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.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

8 2 0 4 0 3 3 0 4 7 8

If you have any questions, please contact William Taylor, the attorney assigned to this matter at (202) 523-4529. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele  
General Counsel

Enclosures

1. Complaint
2. Procedures

8 2 0 4 0 3 3 0 4 7 9



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

November 3, 1980

SPECIAL DELIVERY  
RETURN RECEIPT REQUESTED

A. H. Keyesen, Chairman  
Democratic County Committee  
of Rappahannock County  
Washington, Virginia 22747

RE: MUR 1328(80)

Dear Mr. Keyesen:

This letter is to notify you that on October 31, 1980 1980, the Federal Election Commission received a complaint which alleges that your Committee has violated certain sections 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 1328. Please refer to this number in all future correspondence.

The Commission has adopted special procedures to expedite compliance matters during the pre-General Election period. A summary of these procedures is enclosed. Where possible, within five days after receipt of a complaint, the Commission will determine whether the complaint should be dismissed prior to receipt of your response to this notice. If the Commission dismisses the complaint, you will be so notified by mailgram followed by an explanatory letter. A copy of the Commission's determination to dismiss the complaint may also be picked up in person by you, or your authorized agent, from our Associate General Counsel, Mr. Kenneth A. Gross.

Under the Act, you have the opportunity to demonstrate, in writing, that no further action should be taken against your Committee in connection with this matter. If the Commission is unable to expeditiously dismiss the complaint as outlined above, it will take no further action until we receive your response or 15 days after your receipt of this notification. If the Commission does not receive a response from you within 15 days after your receipt of this letter, it may take further action based on available information.

82040330180

Letter to Mr. A. H. Keyser  
Page Two

You are encouraged to respond to this notification promptly. In order to facilitate an expeditious response to this notification, we have enclosed a pre-addressed, postage paid, special delivery envelope.

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.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

If you have any questions, please contact William Taylor the attorney assigned to this matter at (202) 523-4529.

Sincerely,



Charles N. Steele  
General Counsel

1028 Taylor

1. The following boxes to be completed (check one): <input type="checkbox"/> Show to whom and date delivered. <input type="checkbox"/> Show to whom, date and address of delivery. <input type="checkbox"/> RESTRICTED DELIVERY Show to whom and date delivered. <input type="checkbox"/> RESTRICTED DELIVERY. Show to whom, date, and address of delivery.		CONSULT POSTMASTER FOR FEES	
2. ARTICLES ADDRESSED TO: A. H. Keyser		3. ARTICLE DESCRIPTION: REGISTERED NO. 0911nb	
4. I have received the article described above. SIGNATURE: [Signature] DATE OF DELIVERY: NOV 15 1990		5. ADDRESS FOR RETURN ONLY:	
6. UNABLE TO DELIVER REASON:			

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

November 3, 1980

SPECIAL DELIVERY  
RETURN RECEIPT REQUESTED

Juan Whittington, Chairman  
Democratic County Committee of  
Amelia County  
Route 4, Box 136  
Amelia, Virginia 23002

RE: MUR 1328(80)

Dear Mr. Whittington:

This letter is to notify you that on October 31, 1980  
1980, the Federal Election Commission received a complaint  
which alleges that your Committee has violated certain sections  
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 1328. Please refer to this number in all future  
correspondence.

The Commission has adopted special procedures to expedite  
compliance matters during the pre-General Election period. A  
summary of these procedures is enclosed. Where possible, within  
five days after receipt of a complaint, the Commission will  
determine whether the complaint should be dismissed prior to  
receipt of your response to this notice. If the Commission  
dismisses the complaint, you will be so notified by mailgram  
followed by an explanatory letter. A copy of the Commission's  
determination to dismiss the complaint may also be picked up  
in person by you, or your authorized agent, from our Associate  
General Counsel, Mr. Kenneth A. Gross.

Under the Act, you have the opportunity to demonstrate, in  
writing, that no further action should be taken against your Com-  
mittee in connection with this matter. If the Commission is unable  
to expeditiously dismiss the complaint as outlined above, it will  
take no further action until we receive your response or 15 days  
after your receipt of this notification. If the Commission does  
not receive a response from you within 15 days after your receipt  
of this letter, it may take further action based on available  
information.

32040330182

Letter to Mr. Whittington  
Page Two

You are encouraged to respond to this notification promptly. In order to facilitate an expeditious response to this notification, we have enclosed a pre-addressed, postage paid, special delivery envelope.

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.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

If you have any questions, please contact William Taylor the attorney assigned to this matter at (202) 523-4529.

Sincerely,



Charles N. Steele  
Counsel

8 2 0 4 0 3 3 0 1 8 3

1228 Taylor

1. The following circles to represent (check one): <input type="checkbox"/> Show to whom and date delivered. <input type="checkbox"/> Show to whom, date and address of delivery. <input checked="" type="checkbox"/> RESTRICTED DELIVERY Show to whom and date delivered. <input type="checkbox"/> RESTRICTED DELIVERY. Show to whom, date, and address of delivery.	2. ARTICLE ADDRESSED TO Mr. Whittington	3. ARTICLE NUMBER FROM POSTMASTER'S NO. 591266	4. Always obtain signature of addressee or agent. I have received the article described above. Name: Charles N. Steele Signature: Charles N. Steele Date: NOV 10 1982	5. ADDRESS CHANGE ONLY IF NEEDED	6. UNABLE TO DELIVER REASON:
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POSTAGE PAID PERMIT NO. 1000 WASHINGTON, DC 20001



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

November 3, 1980

SPECIAL DELIVERY  
RETURN RECEIPT REQUESTED

Lawrence White, Chairman  
The Democratic County Committee  
of Clark County  
Battleton Drive  
Berryville, Virginia 22611

RE: MUR 1328(80)

Dear Mr. White:

This letter is to notify you that on October 31, 1980  
1980, the Federal Election Commission received a complaint  
which alleges that your Committee has violated certain sections  
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 1328. Please refer to this number in all future  
correspondence.

The Commission has adopted special procedures to expedite  
compliance matters during the pre-General Election period. A  
summary of these procedures is enclosed. Where possible, within  
five days after receipt of a complaint, the Commission will  
determine whether the complaint should be dismissed prior to  
receipt of your response to this notice. If the Commission  
dismisses the complaint, you will be so notified by mailgram  
followed by an explanatory letter. A copy of the Commission's  
determination to dismiss the complaint may also be picked up  
in person by you, or your authorized agent, from our Associate  
General Counsel, Mr. Kenneth A. Gross.

Under the Act, you have the opportunity to demonstrate, in  
writing, that no further action should be taken against your Com-  
mittee in connection with this matter. If the Commission is unable  
to expeditiously dismiss the complaint as outlined above, it will  
take no further action until we receive your response or 15 days  
after your receipt of this notification. If the Commission does  
not receive a response from you within 15 days after your receipt  
of this letter, it may take further action based on available  
information.

3 2 0 4 0 3 3 0 1 8 4

Letter to Mr. White  
Page Two

You are encouraged to respond to this notification promptly. In order to facilitate an expeditious response to this notification, we have enclosed a pre-addressed, postage paid, special delivery envelope.

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.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

If you have any questions, please contact William Taylor the attorney assigned to this matter at (202) 523-4529.

Sincerely,



William Taylor  
Counsel

2040330185

1321 Taylor

1. The following services to recipient (check one):  
 Return to sender and date delivered  
 Return to return, date and address of delivery  
 RESTRICTED DELIVERY  
Show to whom and date delivered  
 RESTRICTED DELIVERY  
Show to whom, date, and address of delivery

2. CONSULT POSTMASTER FOR FIRM

3. SPECIAL ADDRESSES TO:  
Lawrence White

4. ALWAYS SIGNATURE REQUIRED  
Signature: [Signature]  
I have signed the article described above.  
Signature: William Taylor  
DATE OF SIGNATURE: [Signature]

5. REGISTERED MAIL ONLY IF REQUIRED

6. UNABLE TO DELIVER REASON:

U.S. MAIL SERVICE  
REGISTERED MAIL  
POSTAGE PAID

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 5, 1980

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

J. Curtis Herge  
Counsel for the Republican  
Party of Virginia  
Sedam & Herge  
7600 Old Springhouse Road  
McLean, Virginia 22102

Dear Mr. Herge:

This letter is to acknowledge receipt of your complaint of October 30, 1980, against the Democratic County Committee of Rappahannock County, the Democratic County Committee of Amelia County and the Democratic County Committee of Clark County, which alleges violations of the Federal Election Campaign laws. A staff member has been assigned to analyze your allegations. The respondents will be notified of this complaint within 24 hours and a recommendation to the Federal Election Commission as to how this matter should be initially handled will be made 15 days after the respondents' notification. You will be notified as soon as the Commission takes final action on your complaint. Should you have or receive any additional information in this matter, please forward it to this office. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Please be advised that this matter shall remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless the respondents notify the Commission in writing that they wish the matter to be made public.

Sincerely,

Charles N. Steele  
General Counsel

Enclosure

8 2 0 4 0 3 3 0 1 8 6

8 2 0 4 0 3 3 0 1 8 7



1324 Taylor

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

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:  
 J. Curtis Herye

3. ARTICLE DESCRIPTION  
 REGISTERED NO. CERTIFIED NO. INSURANCE NO.  
 947155  
 (Always obtain signature of addressee or agent)

I have received the article described above.  
 SIGNATURE *X.H. D. Young* CLASSIFICATION *Registered agent*

4. DATE OF RECEIPT  
 NOV 4 1980

5. ADDRESS (Complete only if required)

6. UNABLE TO DELIVER BECAUSE:

Form 3842, Rev. 10-1-79  
RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL



Please  
I in so

8 2 0 4 0 3 3 0 1 8 7

GCC#  
3190

911025

RECEIVED

90 OCT 31 P1:19

**SEDAM & HERGE**  
A PROFESSIONAL CORPORATION  
ATTORNEYS AT LAW  
7800 OLD SPRINGHOUSE ROAD  
MCLEAN, VIRGINIA 22102

GLENN J. SEDAM, JR.  
J. CURTIS HERGE

(703) 821-1000

1700 PENNSYLVANIA AVENUE, N.W.  
WASHINGTON, D.C. 20006  
(202) 393-7124

ROBERT R. SPARKS, JR.  
MICHAEL D. HUGHES  
A. MARK CHRISTOPHER  
KAREN LUSSEN BLAIR  
JOHN ROBERT CLARK III  
J. STANLEY PAYNE, JR.

October 30, 1980

TWX/TELEX: 710-831-0896  
CABLE: SEDAMHERGE

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

0 OCT 31 P 2: 05

GENERAL COUNSEL

Dear Member of the Commission:

This letter constitutes a complaint filed on behalf of our client, the Republican Party of Virginia, 110 East Grace Street, Richmond, Virginia 23219, a political committee as defined under 2 U.S.C. §431(c), against the Democratic County Committee of Rappahannock County, Virginia, Mr. A. H. Keyser, Chairman, Washington, Virginia 22747; Democratic County Committee of Amelia County, Virginia, Mr. Juan Whittington, Chairman, Route 4, Box 136, Amelia, Virginia 23002; and, the Democratic County Committee of Clarke County, Virginia, Mr. Lawrence White, Chairman, Battleton Drive, Berryville, Virginia 22611.

Attached hereto as Exhibit A is a copy of The Rappahannock News of Thursday, October 16, 1980. You will note that, on page 3, there is a two column advertisement advocating the election of Jimmy Carter as President. Please note that the advertisement bears a disclaimer, pursuant to 2 U.S.C. §441(d), which states that the advertisement was placed by authority of Edward Baily, Treasurer of the Rappahannock Democratic Party.

Upon information and belief, similar newspaper advertisements were published in local newspapers in Amelia and Clarke Counties, Virginia, by the respective Democratic County Committees in those localities.

8 2 0 4 0 3 3 0 1 8 9

General Counsel  
Page Two  
October 30, 1980

2 U.S.C. §441(a)(d)(1) states in applicable part,  
that:

"a national committee of a political party and a state committee of a political party, including any subordinate committee of a state committee may make expenditures in connection with the general election campaign of candidates for federal office..."

National party committees are limited by 2 U.S.C. §441(a)(d)(2), 11 CFR 110.7(a)(1) and (2), to "expenditures which do not exceed an amount equal to 2 cents multiplied by the voting age population of the United States..."

11 CFR 110.7(a)(4) states that:

"The National Committee of a political party may make expenditures authorized by this section through any agent, including state and subordinate party committees."

In AO 1980-87, the Federal Election Commission determined that the provisions of the Federal Election Campaign Act, and the Regulations promulgated by the Commission which are cited above, restrict the activities of local party committees, so that expenditures for newspaper advertisements in support of presidential and vice presidential candidates can only be made if authorized and reported by the national committee.

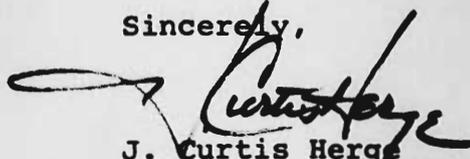
The advertisement disclaimer implies that the advertisement was not paid for by the Democratic County Committees of Amelia, Clarke, and Rappahannock Counties as agents of the Democratic National Committee. If the Democratic National Committee neither authorized nor reported the expenditures for the newspaper advertisement, the expenditures were made in violation of the Federal Election Campaign Laws.

82040330189

General Counsel  
Page Two  
October 30, 1980

Your prompt attention to this complaint would be appreciated.

Sincerely,



J. Curtis Herge  
Counsel for the Republican  
Party of Virginia

Subscribed and sworn to  
before me this 30<sup>th</sup> day  
of October, 1980.

Wm. H. Raley  
Notary Public

My commission expires: 2/6/84

Attachment

82040330190

6 2 0 4 0 3 3 0 4 9 1

RECEIVED

90 OCT 31 P 1: 19



**SEDAM & HERGE**

ATTORNEYS AT LAW  
7600 OLD SPRINGHOUSE ROAD  
MCLEAN, VIRGINIA 22012

**To:**

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

**FIRST CLASS MAIL**

**FIRST CLASS MAIL**



FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR # 1328

Date Filmed 6/2/82 Camera No. --- 2

Cameraman SPC

3 2 0 4 0 3 3 0 4 9 2



FEDERAL ELECTION COMMISSION

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

THE FOLLOWING MATERIAL IS BEING ADDED TO THE  
PUBLIC FILE OF CLOSED MUR 1328.

32040332051



FEDERAL ELECTION COMMISSION

WASHINGTON, DC 20463

TO:

*Steve P.*

DATE:

*5/18/82*

FROM:

*Tom W*

- |   |   |   |
|---|---|---|
| <input type="checkbox"/> APPROVAL                                 | <input type="checkbox"/> IMMEDIATE ACTION           | <input type="checkbox"/> RECOMMENDATION   |
| <input type="checkbox"/> AS REQUESTED                             | <input type="checkbox"/> INITIALS                   | <input type="checkbox"/> SEE ME           |
| <input type="checkbox"/> CONCURRENCE                              | <input type="checkbox"/> NECESSARY ACTION           | <input type="checkbox"/> SIGNATURE        |
| <input type="checkbox"/> CORRECTION                               | <input type="checkbox"/> NOTE AND RETURN            | <input type="checkbox"/> YOUR COMMENT     |
| <input type="checkbox"/> FILING                                   | <input type="checkbox"/> PER OUR CONVERSATION       | <input type="checkbox"/> YOUR INFORMATION |
| <input type="checkbox"/> FULL REPORT                              | <input type="checkbox"/> PER TELEPHONE CONVERSATION | <input type="checkbox"/>                  |
| <input type="checkbox"/> HANDLE DIRECT                            |   |   |
| <input type="checkbox"/> ANSWER OR ACKNOWLEDGE ON OR BEFORE _____ |   |   |
| <input type="checkbox"/> PREPARE REPLY FOR THE SIGNATURE OF _____ |   |   |

REMARKS

*13284 1358*

*Please forward the returned letters to Saunders and Webb Co.*

*Lawrence Mumme III Esq*

*SUITE 804*

*700 EAST MAIN ST.*

*Richmond, Va  
23219*

*Ask Theresa to type Envelopes. Thanks*

82040332052

8 2 0 4 0 3 3 2 0 5 3

FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Official Business  
Penalty for Private Use \$300

POSTAGE AND FEES PAID

SAU 34 2R1309N1 05/13/82



RETURN TO SENDER  
NOT DELIVERABLE AS ADDRESSED  
UNABLE TO FORWARD

Ms. Betty Ann Saunders, Chairman  
The Democratic County Committee  
of Roanoke County, Virginia  
5134 Remington Road, S.W.  
Roanoke, Virginia 24014

87

FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Official Business  
Penalty for Private Use \$300

POSTAGE AND FEES PAID



Prentiss Webb, Treasurer  
Roanoke City Democratic Committee  
P.O. Box 20  
Roanoke, Virginia 24002

ROA 20 991304N1 05/13/82

RETURN TO SENDER  
NOT DELIVERABLE AS ADDRESSED  
UNABLE TO FORWARD

87

FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

8 2 0 4 0 3 3 2 0 5 4

Official Business

Penalty for Private Use \$300

87



Undeliverable as Addressed—  
Unable to Forward—

POSTAGE AND FEES PAID



GENERAL COUNSEL

2 JUN 16 P 1: 39

Ms. Betty Ann Saunders, Chairman  
The Democratic County Committee  
of Roanoke County, Virginia  
5134 Remington Road, S.W.  
Roanoke, Virginia 24014

Forwarding Order Expired

02 JUN 16 P 12: 07

12

FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

POSTAGE AND FEES PAID



Official Business

Penalty for Private Use \$300

Prentiss Webb, Treasurer  
Roanoke City Democratic Committee  
P.O. Box 20  
Roanoke, Virginia 24002

ROA 20 991304N1 05/13/82

RETURN TO SENDER  
NOT DELIVERABLE AS ADDRESSED  
UNABLE TO FORWARD

8 2 0 4 0 3 3 2 0 5 5

87

FEDERAL ELECTION COMMISSION  
WASHINGTON, DC 20463

DATE 6/10/82

TO: Mike A.

FROM: Steve

REMARKS:

0 3 3 2  
4 0 3 3  
This is a corrected  
cert. to replace the one  
already microfilmed.

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
The Democratic County ) MUR 1328  
Committee of Rappahannock ) and  
County, Virginia, et al. ) MUR 1358

CERTIFICATION

I, Marjorie W. Emmons, Recording Secretary for the Federal Election Commission Executive Session on May 4, 1982, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in the above-captioned matter:

1. merge MUR 1358 with MUR 1328;
2. find no reason to believe that the Roanoke County Democratic Committee or the Orange County Democratic Committee violated the Federal Election Campaign Act of 1971, as amended, because there is no evidence that they made an expenditure in the general election advocating the election of Jimmy Carter and Walter Mondale.
3. find that with regard to the Democratic County Committee of Rappahannock County, the Democratic County Committee of Amelia County, The Democratic County Committee of Clarke County, the Democratic County Committee of Greene County, the Democratic County Committee of Gloucester County, the Democratic County Committee of Mathews County, the Democratic County Committee of Goochland County, the Democratic County Committee of Lunenburg County, the Democratic City Committee of Hopewell, the Democratic County Committee of Botetourt County, the Democratic County Committee of Henry County, the Democratic City Committee of Martinsville, the Democratic County Committee of Warren County, the Democratic City Committee of Galax, the Democratic County Committee of Grayson County, the Democratic County Committee of Lee County, and the Roanoke City Democratic Committee,
  - a) reason to believe that each violated 2 U.S.C. §441a and 11 C.F.R. §110.7(a) and (b) by making an expenditure in the general election advocating the election of Jimmy Carter and Walter Mondale;

(Continued)

3 2 0 4 0 3 3 2 0 5 7



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

June 9, 1982

Prentiss Webb, Treasurer  
Roanoke City Democratic Committee  
P.O. Box 20  
Roanoke, Virginia 24002

RE: MUR 1328

Dear Mr. Webb:

On April 9, 1981, the Commission notified you of a complaint alleging that your committee had violated certain sections of the Federal Election Campaign Act of 1971, as amended.

On May 4, 1982, the Commission found: 1) no reason to believe that your Committee had violated 2 U.S.C. § 441d; and, 2) reason to believe that it had violated 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. Unfortunately, by letter of May 10, 1982, you were advised that the Commission had found no reason to believe that your committee had violated the Act. This letter was in error in that it was the Roanoke County Committee which the Commission found no reason to believe had violated the Act. This file has become part of the public record, but if you should wish to submit any materials to appear on the public record, please do so within ten days.

The Commission reminds you that making expenditures (not authorized by the National Committee of a political party pursuant to 2 U.S.C. § 441a(d)) by a local party committee in connection with the general election campaign for any candidate for President of the United States nevertheless appears to be a violation of 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) and you should take immediate steps to insure that this activity does not occur in the future.

Sincerely,

*Frank P. Reiche*

Frank P. Reiche  
Chairman for the  
Federal Election Commission

3 2 0 4 0 3 3 2 0 5 8



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

June 9, 1982

David A. Bowers, Esquire  
404 Shenandoah Building  
Roanoke, Virginia 24002

RE: MUR 1328

Dear Mr. Bowers:

On April 9, 1981, the Commission notified your client, the Roanoke City Democratic Committee, of a complaint alleging that the committee had violated certain sections of the Federal Election Campaign Act of 1971, as amended.

On May 4, 1982, the Commission found: 1) no reason to believe that your client had violated 2 U.S.C. § 441d; and, 2) reason to believe that it had violated 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. Unfortunately, by letter of May 10, 1982, you were advised that the Commission had found no reason to believe that your client had violated the Act. This letter was in error in that it was the Roanoke County Committee which the Commission found no reason to believe had violated the Act. This file has become part of the public record, but if you should wish to submit any materials to appear on the public record, please do so within ten days.

The Commission reminds you that making expenditures (not authorized by the National Committee of a political party pursuant to 2 U.S.C. § 441a(d)) by a local party committee in connection with the general election campaign for any candidate for President of the United States nevertheless appears to be a violation of 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) and you should take immediate steps to insure that this activity does not occur in the future.

Sincerely,

*Frank P. Reiche*

Frank P. Reiche  
Chairman for the  
Federal Election Commission

32040332059



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

June 9, 1982

Ms. Betty Ann Saunders, Chairman  
The Democratic County Committee  
of Roanoke County, Virginia  
5134 Remington Road, S.W.  
Roanoke, Virginia 24014

RE: MUR 1328

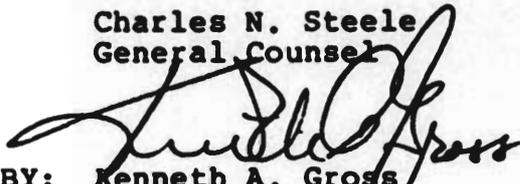
Dear Ms. Saunders:

On December 31, 1980, the Commission notified you of a complaint, designated MUR 1328, alleging that your committee had violated certain sections of the Federal Election Campaign Act of 1971, as amended, or Chapters 95 and 96 of Title 26, U.S. Code.

The Commission, on May 4, 1982, determined that on the basis of the information in the complaint and information provided by your committee, there is no reason to believe that a violation of any statute within its jurisdiction has been committed. Accordingly, the Commission closed its file in this matter. However, you were advised by letter of May 10, 1982, that the Commission had found reason to believe that your committee had violated 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b), but was taking no further action and closing the file. This letter was in error in that it was the Roanoke City Democratic Committee which the Commission had found reason to believe had violated the Act and Regulation. We regret the error.

Sincerely,

Charles N. Steele  
General Counsel

  
BY: Kenneth A. Gross  
Associate General Counsel

92040332060



**FEDERAL ELECTION COMMISSION**  
WASHINGTON, D.C. 20463

**Prentiss Webb, Treasurer**  
**Roanoke City Democratic Committee**  
**P.O. Box 20**  
**Roanoke, Virginia 24002**

**RE: MUR 1328**

**Dear Mr. Webb:**

On April 9, 1981, the Commission notified you of a complaint alleging that your committee had violated certain sections of the Federal Election Campaign Act of 1971, as amended.

On May 4, 1982, the Commission found: 1) no reason to believe that your Committee had violated 2 U.S.C. § 441d; and, 2) reason to believe that it had violated 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. Unfortunately, by letter of May 10, 1982, you were advised that the Commission had found no reason to believe that your committee had violated the Act. This letter was in error in that it was the Roanoke County Committee which the Commission found no reason to believe had violated the Act. This file has become part of the public record, but if you should wish to submit any materials to appear on the public record, please do so within ten days.

The Commission reminds you that making expenditures (not authorized by the National Committee of a political party pursuant to 2 U.S.C. § 441a(d)) by a local party committee in connection with the general election campaign for any candidate for President of the United States nevertheless appears to be a violation of 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) and you should take immediate steps to insure that this activity does not occur in the future.

Sincerely,

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

David A. Bowers, Esquire  
404 Shenandoah Building  
Roanoke, Virginia 24002

RE: MUR 1328

Dear Mr. Bowers:

On April 9, 1981, the Commission notified your client, the Roanoke City Democratic Committee, of a complaint alleging that the committee had violated certain sections of the Federal Election Campaign Act of 1971, as amended.

On May 4, 1982, the Commission found: 1) no reason to believe that your client had violated 2 U.S.C. § 441d; and, 2) reason to believe that it had violated 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. Unfortunately, by letter of May 10, 1982, you were advised that the Commission had found no reason to believe that your client had violated the Act. This letter was in error in that it was the Roanoke County Committee which the Commission found no reason to believe had violated the Act. This file has become part of the public record, but if you should wish to submit any materials to appear on the public record, please do so within ten days.

The Commission reminds you that making expenditures (not authorized by the National Committee of a political party pursuant to 2 U.S.C. § 441a(d)) by a local party committee in connection with the general election campaign for any candidate for President of the United States nevertheless appears to be a violation of 2 U.S.C. § 441a and 11 C.F.R. § 110.7(a) and (b) and you should take immediate steps to insure that this activity does not occur in the future.

Sincerely,

3 2 0 4 0 3 3 2 0 6 2



**FEDERAL ELECTION COMMISSION**

WASHINGTON, D.C. 20463

**Ms. Betty Ann Saunders, Chairman  
The Democratic County Committee  
of Roanoke County, Virginia  
5134 Remington Road, S.W.  
Roanoke, Virginia 24014**

**RE: MUR 1328**

**Dear Ms. Saunders:**

On December 31, 1980, the Commission notified you of a complaint, designated MUR 1328, alleging that your committee had violated certain sections of the Federal Election Campaign Act of 1971, as amended, or Chapters 95 and 96 of Title 26, U.S. Code.

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Sincerely,

**Charles N. Steele  
General Counsel**

**BY: Kenneth A. Gross  
Associate General Counsel**

A handwritten signature in black ink, appearing to be "KAG", written over a faint circular stamp or mark.

32040332063



FEDERAL ELECTION COMMISSION

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

END OF ADDITIONAL MATERIAL FOR CLOSED MR. 1328

82040332064

